

Stakeholder Communication

Bulk Solid Materials Rulemaking

- a) Date and time of Communication: January 15, 2014, 3:30 – 4:00
- b) Place of Communication: CDPH Offices, Telephonic Communication
- c) City officials and staff present:
 - Jennifer Hesse, Staff Attorney, CDPH
 - Dave Graham, Assistant Commissioner, CDPH
 - George Theophilos, Senior Counsel, DOL
- d) Stakeholders present: Eric Boyd, Attorney for Morton Salt
- e) Summary of Stakeholder Communications:

DOL Attorney George Theophilos notified Mr. Boyd about the Guidelines for Stakeholder Communications.

Mr. Boyd stated there have been mixed messages regarding whether or not salt is covered by the proposed regulations. Jennifer Hesse stated the intention was not to cover salt.

Mr. Boyd stated that salt would not be treated the same as other materials; for example, one wouldn't add water to salt. He further stated that Morton's salt is the same as DOT's salt, and the salt is not generally an ingredient in a manufacturing process. However, since "manufacturing process" is not defined in the regulations, there should be a specific exemption for salt.