



## PRODUCT INFORMATION BULLETIN

Emerald Kalama Chemical, LLC

1296 Third Street NW, Kalama, WA 98625

PHONE: (360) 673-2550 FAX: (360) 673-3564

May 01, 2006

TO: SODIUM and POTASSIUM BENZOATE CUSTOMERS

RE: CALIFORNIA PROPOSITION 65

California Proposition 65 requires certain warnings for products containing any of a list of chemicals which California recognizes as carcinogens and/or reproductive toxins. As one of our customers, you may be interested in whether any of these chemicals are found in the Benzoate products we supply to you.

In order to be able to answer Proposition 65 inquiries, we have thoroughly reviewed our raw materials, our process chemistry, our manufacturing technologies and our products themselves. Given the large number of carcinogens and reproductive toxins on the California list, it would be a nearly impossible task for any laboratory to test for the presence of each and every chemical on the list. We therefore used the above mentioned reviews to indicate which chemicals on the list might *possibly* be present in our Benzoate products. We then took the list of "potentially present" chemicals and had our Benzoate products tested under both Food Chemicals Codex ("F.C.C.") methods and other analytical methods by an independent outside laboratory. We have summarized the results of this testing below:

(1) Our review of our Benzoate products indicated the *potential* presence of lead, cadmium, mercury, and arsenic. If any of these trace elements is present, we believe the source of such potential presence would be one or more of the following raw materials: caustic soda, caustic potash or soda ash.

(2) Emerald Kalama Chemical, LLC markets its Sodium and Potassium Benzoate as F.C.C. Grade. This means that all of our Benzoate products meet or exceed the specifications found in the latest edition/revision of the Food Chemicals Codex. According to the F.C.C., their specifications are designed to serve for ingredients of a quality level sufficiently high to ensure their safety under usual conditions of intentional use in foods or in food processing items. The F.C.C. monographs for Sodium and Potassium Benzoate include Limit Tests for heavy metals (lead, cadmium, and mercury will be detected in this test) and arsenic. The F.C.C. specification limit for lead is 2 ppm; their limit for arsenic is 3 ppm. Accordingly, because our Benzoate products meet F.C.C. specifications, the presence of any of these elements, if any, would be at a level below these specifications.

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## CALIFORNIA PROPOSITION 65 (cont.)

(3) In addition to testing by F.C.C. methods, we have also had representative samples of our Benzoate products analyzed for the presence of arsenic, lead, cadmium and mercury by an independent outside laboratory utilizing other analytical methods. The results from these tests indicate that arsenic, lead, cadmium and mercury are not present at levels at or above their Minimum Detectable Level (MDL).

As you may know, MDLs differ from element to element as well as from product to product. As an example, for mercury in Sodium and Potassium Benzoate, the MDL is 0.1 ppm; for arsenic, 0.2 ppm; for cadmium, 1 ppm; and for lead, 2 ppm. Thus, based on these additional tests, we can confirm that our Benzoate products comfortably meet F.C.C. specifications and in fact, do not contain analytically detectable levels of heavy metals.

The above notwithstanding, while we have no reason to believe that mercury, cadmium, lead or arsenic are indeed present in any of our Benzoate products, we are unable to categorically deny their existence for California Proposition 65 purposes because the "safe harbor" limits prescribed by California are well below MDLs.

Simply put, we cannot detect the presence of heavy metals or arsenic within our Benzoate products, but we cannot analytically disprove their presence, either. Accordingly, we feel it is necessary to warn you that our Benzoate products may contain chemicals known to the State of California to cause cancer, birth defects or reproductive harm.

More specifically, based on internal and external testing results, Emerald Kalama Chemical, LLC believes that if arsenic, lead, cadmium or mercury are present, they are present at levels less than the MDLs mentioned above.

We thank you in advance for your consideration in this matter. If you have questions or require additional information, please feel free to contact us at (800) 233-7799.