



September 19, 2011

To: Occupational Safety and Health Standards Board
2520 Venture Oaks Way
Suite 350
Sacramento, California 95833

From: California Pulse, Inc.
23433 Keator Road
Apple Valley, CA 92307

Re.: Petition to Update the Title 8 Standards With NFPA33 2011 Edition

To Whom It May Concern:

This is a petition to the Board to update the Title 8 standards with the current edition (2011) NFPA33 Standard for Spray Application Using Flammable or Combustible materials. The Title 8 standards seem to incorporate a 1970s version NFPA33. There are two reasons why we feel the current version of NFPA33 should be incorporated into the Title 8 standards.

1. There has been many improvements made to NFPA33 over the years and we believe that these improvements should be reflected in the Title 8 standard.
2. Companies in the finishing industry reference the current version of NFPA33 and have their products tested by Nationally Recognized Testing Laboratories to the current NFPA33 standard. It would facilitate doing business in California if the California Title 8 standards relating to spray finishing applications would be the same as the current NFPA 33 standards are.

Best Regards,

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