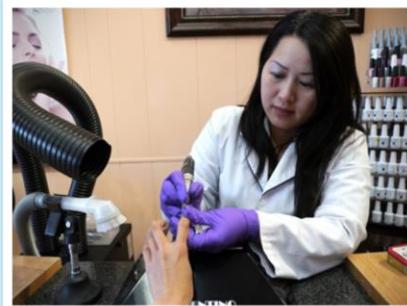




The CA Healthy Nail Salon Collaborative and the Healthy Nail Salon Campaign



Lisa Fu, MPH Program and Outreach Director
Julia Liou, MPH Collaborative Manager & Asian Health Services Planning & Development Director

Presentation Outline

- Background on the CA Healthy Nail Salon Collaborative
- How the Healthy Nail Salon Program was established
- Key Features of the Healthy Nail Salon Program





Mission: To improve the health, safety and rights of the nail and beauty care workforce to achieve a healthier, more sustainable and just industry



Include a little background on some of the policies that were being considered and what inspired the formation of the Collaborative

- Established in 2005
- Over 40 collaborative members, including public health/ environmental advocates, nail salon workers and owners, community-based groups, and allies in public agencies
- Unifying our collective voices to leverage for change
- Three arms of work: community outreach, policy advocacy, and research



Asian Health Services

- Established the Collaborative in 2005
- Noted the epidemic of health issues among Vietnamese nail salon workers
- Community Health Center whose patients are nail salon workers

Help create conditions that assist in empowering the nail salon and cosmetology worker by:

Engaging local grassroots leadership, workers, and when possible, owners in identifying key issues and developing solutions

Encouraging and supporting nail salon workers and owners to be leaders and advocates

Work collectively by:

Sharing knowledge, resources, wisdom, and best practices

Unifying our collective activities and respective strengths to leverage greater power

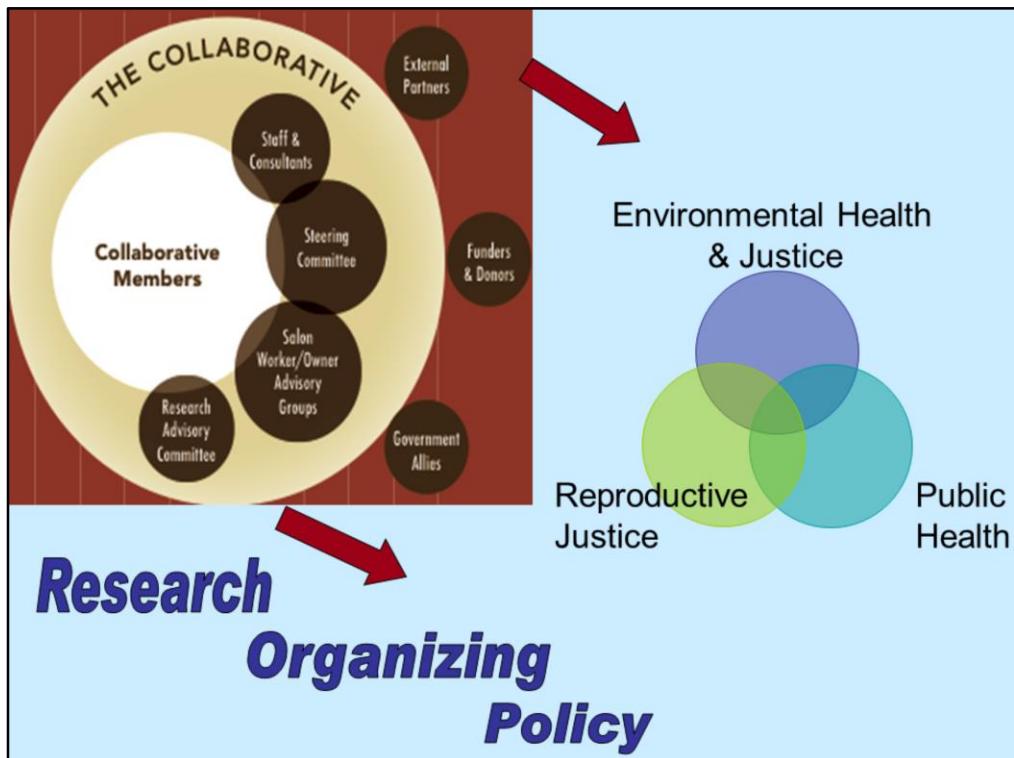
Supporting each other and not reinventing existing practices

Find constructive solutions by:

Identifying practices that benefit both workers and, when possible, small employers in order to ensure worker health and safety, continued employment and business viability

Predominantly targeting manufacturers of harmful products, rather than small businesses

Engaging in policy advocacy, outreach and education, and research



Researchers, Policy wonks, and community organizers

Leadership Development and Empowerment of Salon Workers and Owners



The Collaborative focuses on fostering the inherent strength of immigrant nail salon workers to take an active role in problem solving and advocating for positive outcomes towards safe, healthy and fair working conditions that are free from environmental and workplace hazards and toxins. The nail salon population is a tight knit, family and culture focused community, with up to 80% immigrants from Vietnam. Manicurists take pride in their craft, but most work long hours, for low wages, and in unsafe conditions. Similar to most immigrants, nail salon workers seek to improve their lives and provide for their families.

The Collaborative recognizes the power of the nail salon community to create change for themselves and thousands of others in their community. The Collaborative's leadership development approach builds upon nail salon workers' natural strengths, assets, and experiences to organize the salon community through culturally tailoring our work. Trainings are conducted in Vietnamese, the language most commonly spoken by nail salon workers, and focus on building salon workers' knowledge of ergonomics, chemical exposure, infectious disease, and workplace rights. Core Leaders participate in intensive leadership development training to become advocates, leaders and spokespeople. They also participate in skills building trainings to build their confidence to communicate concerns to decision makers, receive deeper guidance and opportunities for leadership and community building, and increase their leadership in the campaigns. This culturally and linguistically tailored leadership development training curriculum encourages and challenges nail salon workers and owner to lead and create sustainable change to improve the health and well-being of themselves, their families and communities.

Research Advisory Committee

Provide research expertise to the California Healthy Nail Salon Collaborative, including scientific credibility to the work.



- ✓ Conduct research projects that support the Collaborative's mission
- ✓ Facilitate research collaborations among members and allies
- Research Convening: Funded by CBCRP to host a convening to discuss state of the science and research gaps for cosmetics safety. Over 120 participants (researchers, advocates, nail salon workers and owners, cosmetologists, government, and industry) public health experts. Developed a set of research recommendations, with input from various stakeholders
- **Convene a Research Advisory Committee to provide technical expertise.** One of the major outcomes of the research convening was establishing a multi-disciplinary Research Advisory Committee. Meets about two times per year to provide guidance on topics, ranging from chemical hazards to emerging concerns such as gel nails.

National Nail and Beauty Salon Alliance



National arm
of the
Collaborative

National Week of
Action –
Washington, DC



Federal Safe Cosmetics Act

- Phase out toxic chemicals
- Premarket safety assessments
- Full product ingredient lists
- FDA must develop safety standards

- Phase out on the use of known carcinogens, genetic mutagens, and reproductive toxins from cosmetics
- Premarket safety assessments of all personal care product ingredients
- Full product ingredient lists on labels and websites
- FDA must incorporate assessments & develop safety standards on the risk to those highly exposed.

Select Compounds in Nail Products



Compounds	Nail care use	Potential Health Effects	Route(s) of Exposure
Acetone	Nail polish remover	Shortens menstrual cycle	Inhalation, dermal
Dibutyl Phthalate (DBP)	Nail polish	Endocrine disruption; developmental and reproductive effects	Inhalation, dermal
Formaldehyde	Nail hardener, disinfectant	Known carcinogen; respiratory effects	Inhalation, dermal
Methylene Chloride	Artificial nail solvent	Possible carcinogen	Inhalation, dermal
Methyl Ethyl Ketone (MEK)	Nail polish thinners	Damaged liver and kidney, reproductive effects	Inhalation, dermal
Methyl Methacrylate (MMA)	Artificial nails	Respiratory effects - asthma; neurological symptoms	Inhalation, ingestion
Titanium Dioxide	Acrylic nail powder, nail polish	Possible carcinogen	Inhalation
Toluene	Nail polish, nail polish thinner, nail adhesives	Suspected teratogen; endocrine disruption	Inhalation, dermal



Health Impacts

Reproductive Health

- Birth defects
- Miscarriages
- Difficulty conceiving
- Reproductive cancers

Chronic pain

- Carpal tunnel
- Back pain



Acute symptoms & illnesses

- Respiratory illness
- Rashes and skin irritation
- Nose and throat irritation



✗ Cancer

+ Regular exposure to known and suspected carcinogens

✗ Birth Defects & Other Reproductive Health Issues

+ Phthalates transferred to the placenta

+ Toxins passed to newborns when breastfeeding

+ Miscarriages

qualitative stories we've heard about miscarriages and birth defect stories not just in ca but from other grps in Oregon, washington and maybe from the so cal needs assess. Then go more into detail to just briefly mention cancer (repro related like breast cancer) and the reproductive effects are long term concerns but paucity of research them

What is the Issue?

- Cosmetic manufacturers & ingredients are not adequately regulated
- 89 percent of chemicals in personal care and nail products have not been tested independently
- Europe has banned some dangerous chemicals; the US has not



There is very limited regulation and review of the chemicals used in cosmetic and personal care products. Of the more than 10,000 chemicals used in personal care and nail products 89 percent have not been tested independently for their safety or impacts on human health before entering the marketplace.

The CA cosmetology industry is the largest professional licensee population in the nation

Nail salons have tripled in number in the last two decades

A growth sector for new immigrants and small business owners

Over 83,000 manicurists, the majority are low-income women of color

Nail Salon Worker Characteristics

- **Estimated 40% in US and 59-80% in CA are Vietnamese**
 - 95% are women of reproductive age
 - Many are recent immigrants with limited English
 - Lack access to health care and legal services
- **Long-term chronic exposures**
 - Homeland exposures to chemical warfare from the Vietnam War
- **Low socioeconomic status**
 - Most earn less than \$21,700 per year
- **Lack of job security**
 - Many workers are not employees but rent stations in shops
 - Lack of worker-based health insurance
 - Long daily hours (>8 hours per day)
 - Unstable business: high turnover of shops and ownership

\$6 Billion industry; # of salons has grown 374%

As first generation immigrants:

- 1) Lower socioeconomic status
- 2) Language barrier with respect to English

Lack of knowledge about legal and health care systems

Earn less than \$16,000 per year

Estimated 60-70% are Vietnamese

95% are women of reproductive age

Recent immigrants: low-income, limited English

Workforce Context and Complexities

- Employee vs. Independent contractor
- Workplace hazards
- Immigrant workers in Nail Salons
- Current regulation focuses on workers not manufacturers



• Employee vs. Independent contractor

- Lack employee benefits – e.g., health care, calling on OSHA
- Owners are also workers and hire family and friends

• Workplace hazards

- Exposures to multiple chemicals over long periods of time
- Small poorly ventilated salons
- Limited or lack of product (e.g., MSDS hard to understand)

Immigrant workers in Nail Salons

- Language barriers
- Current regulation focuses on workers not manufacturers

How to address the issue?

I'm concerned about the chemicals I work with...



Workers

Take a comprehensive approach and ban bad chemicals...



Community Orgs

I'm interested in addressing nail salon worker health...



Policy maker

San Francisco Campaign



San Francisco Campaign

“Toxic Trio” alternatives available...



“TOXIC TRIO”

Formaldehyde

BAN

Toluene



Dibutyl
phthalate



San Francisco Campaign

BANNING THE “TOXIC TRIO”???

We support, but we don't make the decisions
....



Workers

I'm concerned it will put me out of business ...



Owners

We are concerned about federal pre-emption



Policymaker

How to effectively enforce given City budget cuts...



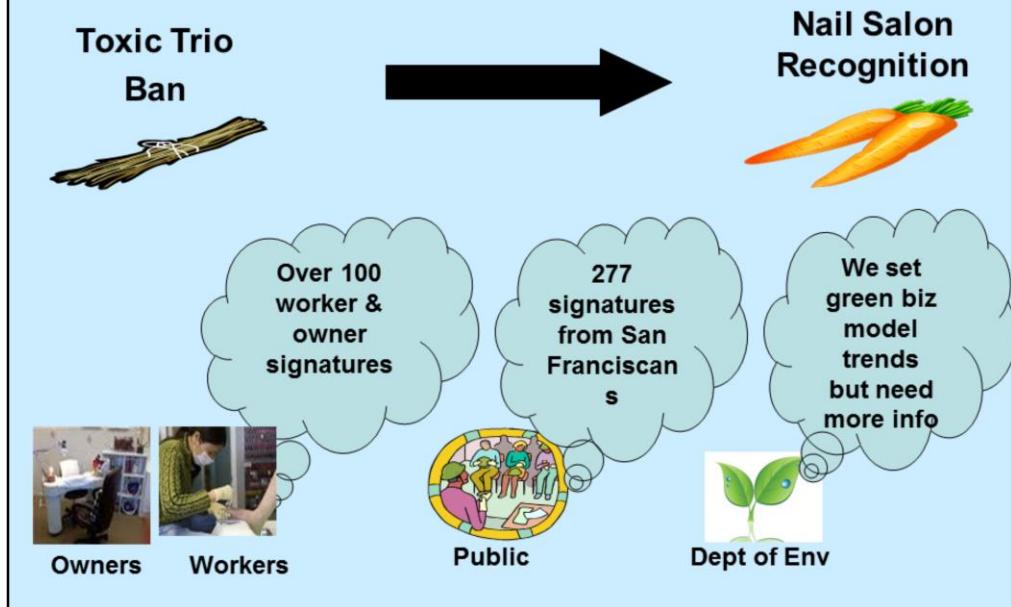
Dept of Public Health

Advisory groups-tested products

Community forums

Surveys

San Francisco Campaign



CARROT VS the STICK
ASSESSED SUPPORT....

San Francisco Campaign



- Developed educational materials
 - Consumer stand
 - List of three-free polishes, top/base coats
 - Wallet cards (Viet & Eng)
- Conducted surveys with 67 salons in 11 districts
- Assessed local beauty supply store products

200 salons in SF

1800 workers

Over 50 brands available, many at-cost

San Francisco Campaign

Survey results

Out of the 67 salons visited:

- Only two salons use no toxic trio/unknown polishes, top coats, and base coats
- 11 salons use no toxic trio/unknown polishes
- 5 salons use no toxic trio/unknown top coats
- 6 salons use no toxic trio/unknown base coats



San Francisco Nail Salon Recognition Program Ordinance

Media event

<http://www.youtube.com/watch?v=zUpz3B>



Introduced the ordinance

Over 50 organizations, SF residents, workers and students attended the event

Over 16 media hits

San Francisco Nail Salon Recognition Program Ordinance

Public Comment Hearing



Over 30 collaborative members, advocates including 15 students, owners, workers who came out to a morning hearing

Empowered workers and owners—FIRST TIME EVER TO CITY HALL, TALKING WITH LEGISLATOR, VOICING THEIR CONCERNs

San Francisco Nail Salon Recognition Program Ordinance



Community workshops & Mandatory staff trainings



Recognition of salons



Expanding the HNS Program



Salon owners go through a training program run by the city or county, and they commit to adopting the following healthy salon practices (see next slide)

Questions?

www.cahealthynailsalons.org

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**Collaborative Contacts for
Additional Information**



Pretty Shouldn't Stink: How a Healthy Nail Salon program can help.

Swati Sharma, Senior Commercial Toxics Reduction Coordinator

Anya Deepak, Commercial Toxics Reduction Associate



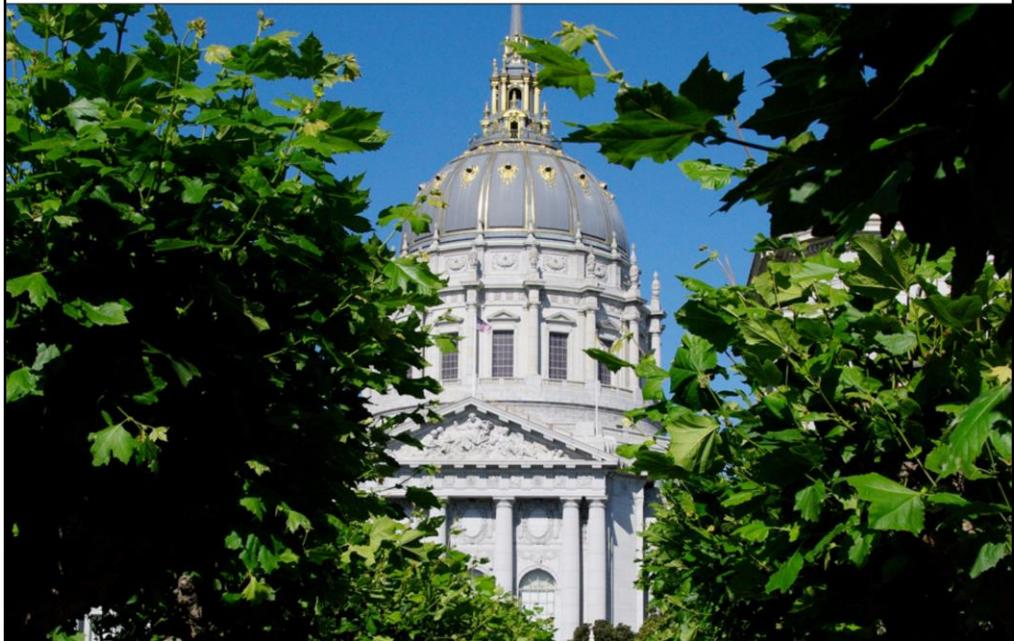
SF Environment

Our home. Our city. Our planet.

A Department of the City and County of San Francisco



The Department of the Environment



At the San Francisco Department of the Environment also known as (SF Environment) we aim to create visionary policies and innovative programs that promote social equity, protect human health, and lead the way toward a sustainable future. Within the department of environment, we have several divisions including: zero waste, energy, climate change, transportation and the team my colleague Anya and I are part of -- Toxics reduction -- where we provide environmentally friendly alternatives to toxic products. We help our residents, city staff and SF businesses with information and access to safer alternatives and disposal options.

I head the Commercial toxics section, where we work with the businesses of SF. Since exposure to chemicals at work can be a major health issue, we help businesses implement environmentally responsible practices and recognize them for their efforts.



Presentation Overview



And one of our programs is the Healthy Nail Salon Program.

Anya and I will talk about:

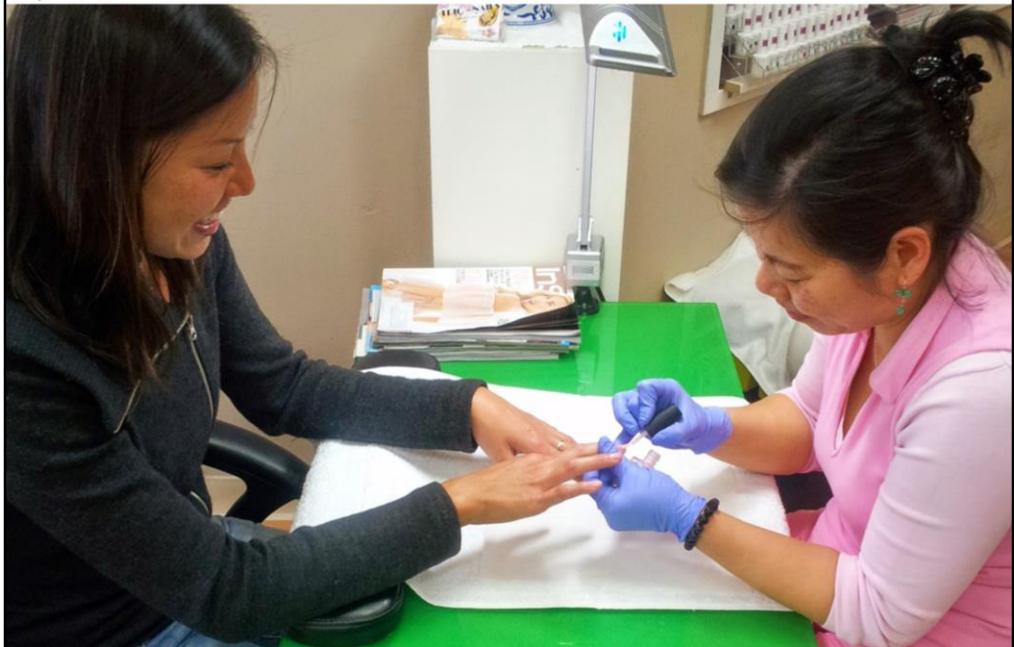
What are the issues – why we started the program

The How and What – the day to day running and obstacles we faced

And a review of the program to see if it is effective.



The Why - Demographics



Let's start with the why. In the last 20 years, the number of nail salons has tripled. In 2010, there were more than 375,000 nail technicians in the US and more than 57,000 nail salons.

The average salary of nail technicians is less than \$18,200 per year

95% of the nail salon work force are women of childbearing age, and most do not speak English

They work around 8 to 10 hours a day and 6 to 7 days a week.



The Why - Chemicals



For most people, these are what nail salon chemicals look like.

But it is actually a range of products from base coats, top coats, polish removers, thinner, gel polishes, artificial nail building chemicals, strengtheners, and disinfectants, many of which contain chemicals harmful to health and the environment.

Almost all these products contain some Phthalates, solvents, acrylates, formaldehyde and plasticizers.



The Why - Health



Many technicians do not have health insurance.

The chemicals in the salon are known to cause health problems ranging from asthma and irritation to possibly cancer.

They can damage the nervous system, cause headaches and dizziness and irritate the skin and nails.

They may also cause miscarriages in women of childbearing age.

Many doctors don't know or discuss risks that are related to working in a nail salon.

A 2012 by American Congress of OBGYNs found that majority of OBGYNs do not talk to their patients about environmental exposures

The 1968 exposure limits set by OSHA were designed for industrial settings, a healthy 180 pound man and for 8 hour work days. They also do not account for multiple exposures. Obviously, this is hardly the case in salons.

OSHA is working to change the regulations, but hoping that local regulations will happen.



Our Why



And that is where we come in. The city of San Francisco adopted the precautionary principle, which implies that there is a social responsibility to protect the public from exposure to harm, when scientific investigation has found a plausible risk. So even when we do not have hundreds of studies to back up the anecdotal evidence we see in this community, we can fall back on the precautionary principle to take anticipatory action to prevent harm to human and environmental health.



Nail Salon Community in San Francisco



In San Francisco, there are about 250 salons that employ around 2500 nail technicians. 95% of the nail technician community is Vietnamese. Being extremely entrepreneurial and enterprising, many open their own salons and work along side other employees. The community builds human capital and invests in it.



City Ordinance



In the year 2010, San Francisco passed an ordinance that helped the city invest in the community as well.

The ordinance was to provide recognition to salons that choose safer products & train their employees. The task of establishing what this would look like, the criteria, the products, the training was left to the Department of the Environment.

In San Francisco, there was no need to pass an ordinance to develop a voluntary program, but it gave us a solid foundation to work from, as well as a good boost of publicity to start the program.



Stakeholders Engagement



Until 2011, we conducted some outreach to nail technicians, but there was no recognition program and no incentives given to them to change their products and practices. Then the Department of the Environment held a broad stakeholder meeting that included nail technicians, salon owners, manufacturers and advocacy groups to solicit their input for a successful program. I realize it is not always easy to start a constructive dialogue with manufacturers, but I urge you to do so. In our case we found it very beneficial. It helped us dispel some myths and see the process and timeline for changing out chemicals in products.

Most of these issues are still the same today.

Based on the feedback we received we embarked on a process to research products and create a program

We knew there would be more to do as the program grew. But no one could have warned us how much. Our hope is that what we learned will help remove barriers for other cities that want to implement programs.



Evaluating Products

Substance	CAS-#	Prioritization Weighted priority (0-100)		Scoring Compon
		Health (60%) + peer (20%) + availability (20%) and in > 1% of products	72	
benzophenone	CAS-119-11-9	72	72	2 3
formaldehyde	CAS-50-0-0	72	72	2 3
methyl ethyl ketone	CAS-78-93-3	72	72	2 3
dibutyl phthalate	CAS-84-74-2	70	70	2 3
silica	CAS-76-31-86-9	69	69	2 2
benzophenone-1	CAS-101-56-6	68	68	2 3
aluminum calcium sodium silicate	CAS-1344-01-0	58	58	2 0
benzene	CAS-71-43-2	58	58	1 3
n-butanol	CAS-71-36-3	58	58	1 3
propylene glycol monomethyl ether	CAS-107-98-2	58	58	2 3
toluene	CAS-108-88-3	57	57	2 1
ethylene oxide	CAS-75-21-8	56	56	1 3
toluene sulfonamide formaldehyde resin	CAS-1338-51-8/	56	56	1 3
camphor	CAS-76-22-2	54	54	2 0
acetone	CAS-67-64-1	51	51	1 2
nitrosamines	SD-226336	50	50	1 3
oxybenzone	CAS-131-57-7	50	50	2 0
triphenyl phosphate	CAS-115-86-6	47	47	1 2
n-propyl acetate	CAS-109-60-4	41	41	1 1

Carcinogen, Mutagen, Reproductive or developmental toxicant?

Short-term health impacts like skin, eye or respiratory irritation?

Regulated by EU, Canada, Japan?

So the first thing step was evaluating nail products. There were chemicals in nail product formulations that were toxicants and regulated by other countries. Our product criteria were reformed based on questions like these.



Evaluation Process

Step 1: Compiled existing nail polish formulations 1100

Step 2: Identified unique ingredients in nail polishes 450

Step 3: Assessed health impacts 88

Step 4: Conducted a scientific peer-review 23

Step 5: Checked availability of alternatives 3

We started with a list of 1100 formulations. We identified 450 unique ingredients used in nail polishes. Only 88 could be assessed for their health impacts. 23 out of those were peer reviewed and only 3 had available substitutes.



Polishes

NAIL POLISH CHEMICALS OF CONCERN								
Chemical	Type of Ingredient	VOC ¹	% of products containing chemical ²	Health Impacts		Environmental Impacts	List(s)	Regulations
				Acute	Chronic			
Dibutyl phthalate	Plasticizer	No	13.6%	-Immunotoxicant ³ -Skin or sense organ toxicant ⁴	-Developmental toxicant ⁵ -Endocrine toxicant ⁶ -Ecotoxicant ⁷ -Gastrointestinal or liver toxicant ⁸ -Reproductive toxicant ⁹ -Immunotoxicant ¹⁰ -Neurotoxicant ¹¹	-Dangerous for the Environment of Nordic Council of Ministers ¹² -Disrupts hormone pathways: ecosystem, wildlife and environmental toxicity ¹³	-Chemical of concern: EPA, IRIS ¹⁴ -Toxic Release Inventory Chemical ¹⁵	-Prohibited unsafe for use in cosmetics: 76/788/EEC European Union ¹⁶ -Hazardous Air Pollutant: Clean Air Act ¹⁷ -Priority Substances: Resource Conservation and Recovery Act ¹⁸ -Prop 65: California ¹⁹ -California Toxic Air Contaminant AB 1807 ²⁰ -Priority pollutant: Clean Water Act ²¹
Formaldehyde	Preservative	Yes	1.2%	-Skin or sense organ toxicant ¹¹ -Respiratory toxicant ¹⁹ -Asthma ²²	-Carcinogen ¹¹ -Gastrointestinal or liver toxicant ¹¹ -Neurotoxicant ¹¹ -Reproductive toxicant ⁸ -Immunotoxicant ¹¹	-Air contaminant ²³ -Hazardous air pollutant ²¹	-Californian air toxics hot spot chemical: AB 2388 ²¹ -Chemical of concern: EPA, IRIS ⁹	-Prohibited: Japan ²³ -Restricted use in cosmetics: 76/788/EEC European Union ¹⁶ -Restricted: Canada ²⁴ -Prop 65: California ¹⁹
Toluene	Solvent	Yes	6.9%	-Respiratory toxicant ¹¹ -Skin or sense organ toxicant ² -Irritation to eyes and nose, weakness, burning skin rash, dizziness	-Cardiovascular toxicant ²¹ -Gastrointestinal or liver toxicant ¹¹ -Developmental toxicant ¹¹ -Reproductive toxicant ⁸ -Immunotoxicant ¹¹	-Air contaminant ²³ -Hazardous air pollutant ¹³ -Clean Water Act ¹⁴ -Priority pollutant ¹⁵ -Groundwater contaminant ²⁵	-Chemical of Concern: EPA ¹⁴ -Reproductive Chemical of Concern: European Union ¹⁷	-Prohibited, unsafe for use in cosmetics: Interministerial France Association ²⁶ -Priority pollutant: Clean Water Act ¹⁴ -Prop 65: California ¹⁹ -Toxic Air Contaminant: California AB 1807 ²⁰
Benzophenone	UV Stabilizer	No	2.0%	-Skin or sense organ toxicant ²⁷ -Eye, nose, and throat irritation ²	-Endocrine toxicant (estrogenic and anti-androgenic) ²⁸ -Gastrointestinal or liver ¹ -Cardiovascular blood toxicant ²¹	-Readily adsorbs to soil (low-medium soil mobility) ²⁹ -Found in surface and ground water from domestic discharge ³⁰	-Substance of Very High Concern: European Union REACH ³¹	
Benzophenone-1	UV Stabilizer	No	48.7%	-Skin or sense organ toxicant ¹¹ -Phenoxethes, Shortness of breath, chest pain ³¹	-Endocrine disruption ⁴ -Estrogen ³¹ -Androgenic ³¹ -Carcinogen ¹¹	-Significant wildlife and the environment disruption ³¹	-Endocrine disruption: European Commission ³¹	
Silica	Ant-caking agent	Yes	11.2%	-Respiratory toxicant ³² -Pneumoconiosis caused by inhalation of silica dust ³³	-Carcinogen ¹¹ -Gastrointestinal or liver toxicant ¹ -Kidney toxicant ¹	-Persistent, bioaccumulative in wildlife and humans ⁴⁰		-Prop 65: California ¹⁹ -Air Contaminant: Federal OSHA ³⁰ -Air Contaminant: California OSHA ⁴
Nitrosamines	Byproduct	No	41.8%	-Skin or sense organ toxicant ¹	-Strong carcinogen ⁴¹	-Air Contaminant ³⁹ -Hazardous Air Pollutant ²⁰	-IARC Group II ³¹ -Prop 65: California ² -Toxic under the EPA's Toxics Release Inventory ⁴³ -Resource Conservation and Recovery Act: Hazardous Constituent ⁴⁴ -Hazardous Superfund Substance ⁴⁵ -Hazardous Substances	-Prohibited for use in cosmetics: Canada ²⁴ -Prohibited for use in cosmetics: European Union ¹² -Air Contaminant: Federal OSHA ³⁰ -Air Contaminant: California OSHA ⁴

We did an analysis of the three chemicals in polishes and that formed the basis of our first programmatic criteria: that the products should be free of the toxic trio.



Removers

NAIL POLISH REMOVER CHEMICALS OF CONCERN							
Chemicals of Concern	Type of Ingredient	VOC ¹	Health Impacts		Environmental Impacts	List	Regulation
			Acute	Chronic			
Acetonitrile	Solvent	Yes	-Irritant for skin eyes and lungs ² -Respiratory toxicant ³	-Developmental toxicant ⁴ -Reproductive toxicant ⁴ -Cardiovascular or blood toxicant ⁴ -Kidney toxicant ⁴ -Neurotoxicant ⁴ -Gastrointestinal or Liver Toxicant ⁴	-Hazardous air pollutant ⁵ -Air contaminant ⁴	-California air toxics hot spot chemical: AB 2588 ¹⁰	-Prohibited and Restricted Cosmetics Ingredients: Canada ¹¹ -Banned/Restricted in Cosmetics: European Union ¹² -Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴ -Hazardous Air Pollutant: Clean Air Act ¹⁵ -California Toxic Air Contaminant: AB 1807 ¹⁶
Methanol	Solvent	Yes	-Respiratory toxicant ⁵ -Skin or sense organ toxicant ¹⁷	-Developmental toxicant ⁴ -Gastrointestinal or liver toxicant ⁴ -Kidney toxicant ⁴ -Neurotoxicant ⁴	-Hazardous air pollutant ¹¹ -Air contaminant ¹⁷	-Clean Air Act: hazardous air pollutant ¹¹ -California air toxics hot spot chemical: AB 2588 ¹⁰ -Toxic Release Inventory Chemical ¹⁸	-Prohibited: Japan ¹⁹ -Prohibited/Restricted: Canada ¹¹ -Banned/Restricted in Cosmetics: European Union ¹² -Hazardous Air Pollutant: Clean Air Act ¹⁵ -Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴ -California Toxic Air Contaminant: AB 1807 ¹⁶
Methyl Ethyl Ketone (MEK)	Solvent	Yes	-Respiratory toxicant ⁵ -Nasal irritation ¹ -Skin or sense organ toxicant ¹³	-Cardiovascular or blood toxicant ⁴ -Developmental toxicant ⁴ -Gastrointestinal or liver toxicant ⁴ -Kidney toxicant ¹¹ -Neurotoxicant ⁴ -Reproductive toxicant ^{1,22}	-Hazardous air pollutant ¹¹ -Air contaminant ¹⁷	-California air toxics hot spot chemical: AB 2588 ¹⁰ -Hazardous Superfund Substance ²¹ -Toxic Release Inventory Chemical ¹⁹	-Restricted allowable workplace exposures: European Union ²⁴ -Resource Conservation and Recovery Act: Hazardous Constituent ²⁵ -Hazardous Air Pollutant: Clean Air Act ¹⁵ -Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴ -California Toxic Air Contaminant: AB 1807 ¹⁶
Methyl acetate	Solvent	VOC Exempt	-Skin, lung irritant -Eye/nerve ²⁶ -Skin or sense organ toxicant ¹³	-Respiratory toxicant ⁵ -Persistent bioaccumulation ²¹	-Persistent Bioaccumulation ²⁷		-Restricted allowable workplace exposures: European Union ²⁴ -Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴
T-Butyl acetate	Solvent	Yes	-Eye, nose, throat irritant ²⁹	-Neurotoxicant ²²	-Air contaminant ¹¹	-Hazardous Superfund Substance ²¹	-Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴
N-Butyl acetate	Solvent	Yes	-Skin or sense organ toxicant ⁵	-Gastrointestinal or liver toxicant ⁴ -Neurotoxicant ²² -Respiratory toxicant ⁵	-Air contaminant ¹¹	-Hazardous Superfund Substance ²¹	-Restricted allowable workplace exposures: European Union ²⁴ -Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴
Acetone	Solvent	VOC Exempt/ NPOC	-Respiratory toxicant ⁵ -Skin or sense organ toxicant ¹³	-Gastrointestinal or liver toxicant ⁴ -Neurotoxicant and Developmental toxicant ²²	-Air contaminant ¹¹	-California air toxics hot spot chemical: AB 2588 ¹⁰ -Hazardous Superfund Substance ²¹	-Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴
Ethyl acetate	Solvent	Yes	-Respiratory toxicant ⁵ -Skin or sense organ toxicant ¹³ -Respiratory tract irritant, eye, nose and skin irritation ⁵	-Neurotoxicant ²²	-Air contaminant ¹¹	-Hazardous Superfund Substance ²¹	-Air Contaminant: Federal OSHA ¹³ -Air Contaminant: California OSHA ¹⁴

Then we looked at removers. Traditionally, acetone was the bad actor in salons, but the substitutes that had taken its place were even worse. Ethyl and butyl acetate that would have been substitutes are not allowed in removers under California's air resources board rules.

So, we started recommending acetone or ethyl lactate, which became the second criteria for our program.



Thinner

NAIL POLISH THINNER CHEMICALS OF CONCERN							
Chemicals of Concern	Type of Ingredient	VOC ¹	Health Impacts		Environmental Impacts	Lists	Regulations
			Acute	Chronic			
Toluene	Solvent	Yes	-Respiratory toxicant ² -Skin or sense organ toxicant ³ -Irritation to eyes and nose -Weakness, burning skin rash -Dizziness ⁴	-Cardiovascular or blood toxicant ⁴ -Gastrointestinal or liver toxicant ⁵ -Neurotoxicant ⁶ -Developmental toxicant ⁷ -Reproductive toxicant ⁸ -Immunotoxicant ⁹	-Air contaminant -Hazardous Air Pollutant ¹⁰ -Priority Pollutant Clean Water Act ¹¹ -Groundwater contaminant ¹¹	-Air Toxics Hot Spot: California ¹² -Chemical of concern: EPA-IRIS ¹³	-Prohibited, unsafe for use in cosmetics: International Fragrance ¹⁴ -Clean Water Act: priority pollutant ¹¹ -Prop 65: California ¹⁵ -California Toxic Air Contaminant AB 1807 ¹⁶
Methanol	Solvent	Yes	-Respiratory toxicant ² -Skin or sense organ toxicant ³	-Developmental toxicant ¹⁷ -Gastrointestinal or liver toxicant ⁵ -Kidney toxicant ¹⁷ -Neurotoxicant ⁶	-Hazardous air pollutant ¹⁸	-Clean Air Act-hazardous air pollutant ⁹ -California air toxics hot spot chemical-AB 2588 ¹⁹ -Toxic Release Inventory Chemical ¹⁸	-Prohibited: Japan ¹⁹ -Prohibited/Restricted: Canada ²⁰ -Hazardous Air Pollutants: Clean Air Act ¹² -Air Contaminant: Federal OSHA ²⁰ -Air Contaminant: California OSHA ²¹ -California Toxic Air Contaminants AB-1807 ¹⁶
Methyl Ethyl Ketone (MEK)	Solvent	Yes	-Respiratory, nasal irritation ² -Skin or sense organ toxicant ³	-Cardiovascular or blood toxicant ⁴ -Developmental toxicant ¹⁷ -Gastrointestinal or liver toxicant ⁵ -Kidney toxicant ¹⁷ -Neurotoxicant ⁶ -Reproductive toxicant ⁷	-Hazardous air pollutant ¹⁸	-California air toxics hot spot chemical-AB 2588 ¹⁹ -Hazardous Superfund Substance ²² -Toxic Release Inventory Chemical ¹⁸	-Restricted allowable workplace exposure: European Union ²³ -Resource Conservation and Recovery Act: Hazardous Constituents ²⁴ -Hazardous Air Pollutants: Clean Air Act ¹² -Air Contaminant: Federal OSHA ²⁰ -Air Contaminant: California OSHA ²¹ -California Toxic Air Contaminants AB-1807 ¹⁶
Butyl acetate	Solvent	Yes	-Skin or sense organ toxicant ³	-Gastrointestinal or liver toxicant ⁵ -Neurotoxicant ⁶ -Respiratory toxicant ¹⁷	-Hazardous air pollutant ¹⁸	-Allowed workplace exposure restricted to moderate dose European Union: Classification & Labeling ²⁵ -Hazardous Superfund Substance ²²	-Air Contaminant: Federal OSHA ²⁰ -Air Contaminant: California OSHA ²¹
Ethyl acetate	Solvent	Yes	-Respiratory toxicant ² -Skin or sense organ toxicant ³	-Neurotoxicant ⁶	-Hazardous air pollutant ¹⁸	-California air toxics hot spot chemical: AB 2588 ¹⁹ -Hazardous Superfund Substance ²²	Air Contaminant: Federal OSHA ²⁰ Air Contaminant: California OSHA ²¹

Similarly for thinners, we saw a need to reduce the use of thinners as much as possible, and then avoid certain chemicals in the event the salon must use thinner. This formed our third criteria. All this research is available if you want a place to start a similar program in your city. [We will soon be undertaking a new review of ingredients to see if anything has changed.]



Creating the Program



Once the research on the products had been done, the next step was to create the program. In February of 2012, we passed our regulations that created the Healthy Nail Salon program. This program is the first of its kind in the nation and SF was the first county in the nation to create an incentive-based recognition approach that encourages salons to apply source reduction strategies to reduce chemical exposures. The program consists of: 10 Criteria the salons must comply with, a training program, and Recognition. Let us first look at the criteria.



Not just safer products

- Free of:
- Formaldehyde
- Toluene
- Dibutyl Phthalate
- Methyl Ethyl Ketone

Products



- Gloves
- Masks
- Designated Area
- Training

Practices



- General Ventilation
- Localized Ventilation

Ventilation



This is an overview of the criteria to become a Healthy Nail Salon: **products, practices and ventilation**. From the stakeholder process, one lesson we learned was that it was not just about having a list of safer products.



The Criteria

1

Use Polishes free of:

- Toluene
- Dibutyl phthalate
- Formaldehyde



The first criteria is: using polishes free of the toxic trio.



Safer Products



Healthy nail salons use toxic trio free polishes, but they go way beyond that. Safer products include safer top coats, safer removers and safer thinners.



Testing the Ingredients



Around the same time when we were developing our program, we wanted to make sure that if a polish was labeled 3 free, they actually were. We reached out to the California Department of Toxic Substances Control, where they tested 25 random brands. They found that 10 of the 12 products claiming to be 3 free, actually contained toluene. Since then, many of the brands came out with new formulations that claim they are three free, but unfortunately, we nor DTSC has the funds to continue testing.



The Criteria

2

Safer Polish Remover



3

Reduce Thinner



The 2nd criteria was to Use safer removers

Removers can be acetone based

Cannot be ethyl acetate or butyl acetate based

Even though acetone is not a desirable nail salon chemical, the non acetone removers used chemicals like Methyl Ethyl Ketone which were even more harmful than acetone. Ethyl lactate based removers are also a good alternative albeit more expensive than acetone.

The 3rd criteria was to avoid using thinners unless absolutely necessary

In case they have to use it, salons have been asked to purchase thinners without toluene or methyl ethyl ketone (MEK)



The Criteria

4

Ensure that all nail salon staff wear nitrile gloves when using nail products.



Apart from the products, there are 7 other criteria. The 4th criteria is to wear gloves. Gloves must be worn whenever handling salon products. **We suggest nitrile gloves for all products, except when acetone is used for longer times. For most salon products, nitrile gloves are protective yet tactile enough for the technician to be able to do detailed work. But nitrile disintegrates when exposed to acetone for more than a few minutes. While it is required to dispose the gloves after each client, some treatments require extended exposure to acetone, in which cases nitrile would not be a good option. That is when we recommend technicians wear latex gloves.**

Other suggested personal protective equipment include:

Long Sleeves

Safety Goggles

N95 Masks



Personal Protective Equipment



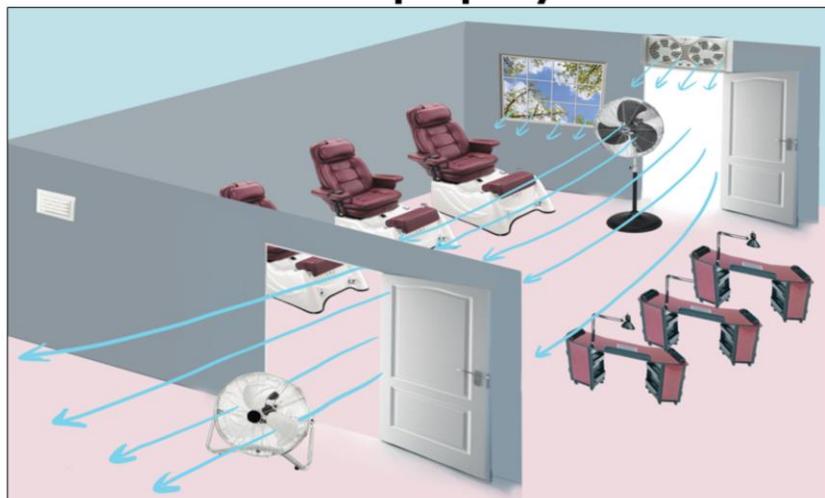
Healthy Nail Salons wear gloves while handling chemicals. Many of the salon employees would feel odd wearing gloves because the customers would ask them why they were doing it. They also felt they did not get a good grip on polishing nails with gloves on. We train them on how to educate the customers and encourage practicing working with gloves so it becomes second nature. **They are also encouraged to wear N95 masks when sanding down artificial nails.**



The Criteria

5

Designate a specific area for artificial nail services and properly ventilate the area



The 5th criteria is to have a good ventilation in the salon. General ventilation is discussed during the training to tailor it to the particular salon. Our ordinance only addresses salon ventilation where artificial nail services are provided. Now we are asking our salons to go above and beyond the ordinance requirements by ventilating all areas. A lesson learned here is that having an ordinance-based program is not as flexible as you might need it to be.



General Ventilation



In San Francisco, there are some unique challenges and advantages when it comes to ventilation. The temperate climate means there is no need for air conditioning and that salons can keep the salon doors open 6 months out of 12 to have cross ventilation. Many salons are situated in older buildings with no built in ventilation or ability to cross ventilate. Some salons have exhaust fans like these.

We look at each salon individually to determine the types of services they perform, the layout and airflow in the salon, the need for a particular type of general ventilation and suggest where they can place fans to provide some airflow.

Some states, like New York, are looking at their ventilation requirements for nail salons.



The Criteria

6

Install mechanical ventilation system



The 6th criteria is to install a mechanical ventilation system if the salon is doing artificial nail treatments. Better ventilation means having a portable ventilation unit for doing artificial nails. Working with the monomer, applying artificial nails, sanding the nails, etc exposes the technician and the customer to irritants, asthmagens and toxicants that can be reduced with a source capturing system like the one shown here.

Charcoal filtered air ventilation passes air through activated charcoal and recirculates the clean air in the salon.



Ventilation Units

Thank you for participating in San Francisco's Healthy Nail Salon Program. In order to become recognized as a healthy nail salon, your salon must comply with the 9 criteria outlined in our registration form and submit an application form. One of the 9 criteria is to install a ventilation unit. Please note:

- The ventilation units will be one of the units outlined below
- The filters will need to be replaced within 6 months to 1 year of use, depending upon total usage of the ventilation unit
- In order to remain in the Healthy Nail Salon Program, San Francisco's Department of Environment will check for proof of purchase of air filters after one year of use



What you see here is a portion of our ventilation fact sheet. We give salons a choice of four ventilation units to purchase.

We provided 100% rebates for the ventilation units to the first 15 nail salons that qualified or asked for them as a way to reward the early adopters. We plan to continue this requirement, but have no additional subsidies for salons coming into the program. We are hoping that this will not become a barrier to joining the program.

These cost anywhere from \$800 to \$1400. So it is a significant investment, that without the rebates, we're concerned they might find it prohibitive. We will see.

Unfortunately, there has not been a lot of research done on the effectiveness of the ventilation units. This would be a great funding opportunity for those of you who are looking for important projects to fund.



The Criteria

7

Train all salon staff



The 7th criteria is to train all salon staff. The criteria makes sure that our hands-on training would provide the salon and the employees with:

- Multilingual training manual
- Eye goggles
- Dust masks
- Box of nitrile and latex gloves

We require every salon employee (owner, receptionist, cosmetologist) to participate in the training for a salon to be recognized.

They are also trained on:

Program Criteria

Safer Chemicals

Safety and Protecting Health

Greening their salon with Energy & water efficacy and Waste disposal



Centralized Training

Điều kiện tham gia bao gồm:

4. Complete Application Form *Đơn đăng ký tham*
5. Re-Apply for Program if when necessary
Đăng ký chương trình lần thứ 2



At first, many owners wanted to evaluate the trainings before signing on.

So we started bilingual centralized trainings that were open to all to come attend.



In-Salon Training



Once they saw we were helping their employees and their business, they signed up. We offer trainings in the language they are most comfortable in at their salons.



Technical Assistance



The salons are also given technical assistance on what to buy and what to avoid when they go to their supply stores.



The Criteria

8

Allow SF Environment staff to conduct air monitoring

9

Commit to trying safer artificial nail products



The 8th criteria, we will discuss later in the presentation when we talk about the evaluation of the program.

The 9th criteria was to encourage salons to try safer artificial nail products



Artificial Nails



Technicians should not be asked to pay the price of beauty. We educate salon technicians on artificial nail products and how currently there are no safer alternatives to them. When we created the program we thought about restricting the use of artificial nails to be part of the program, but the salons pushed back and told us artificial nails is the bread and butter of many salons, but they were open to taking precautions. The criteria is that if there are safer products, they should use them. Our research thus far shows there are none yet. Until then at least, they must take extra protections to make sure they are being safe around these harmful chemicals. Many salons have reduced the amount of artificial nail services they offer. Some times this can be attributed to the training and some times to the changing consumer demand. Yet in some business corridors, rows of salons offering these services show no signs of slowing down, perhaps due to some salons no longer offering them.



The Criteria

10

Do not use products brought in by customers unless they meet program criteria



And the last criteria is to use products that the salons have bought themselves. They are trained on answering customer questions and coaching customers to buy better products or use what the salon already has. Now I will turn it over to Anya who will talk about the recognition, evaluation and next steps for the program.



Outreach

Start by Avoiding Harmful Products:

If Environment has created easy guidelines to help you purchase safer products for your salon.

Polishes and Lacquers without:

- Toluene
- Di-n-butylphthalate
- Formaldehyde

Nail Polish Thinners without:

- Toluene
- Solvent
- Methyl ethyl ketone (MEK)

Nail Polish Removers without:

- Ethyl or butyl acetate

Artificial Nails without:

- Methyl methacrylate

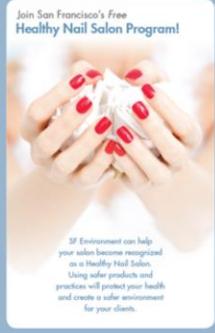
(Based on fda.gov)

For More Information Please Visit:

SFEenvironment.org/nailsalons
CAhealthymanicures.org

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Join San Francisco's Free Healthy Nail Salon Program!



SF Environment can help your salon business recognized as a Healthy Nail Salon. Using safer products and practices will protect your health and create a safer environment for your clients.

Hãy khởi đầu bằng cách tránh xa những sản phẩm độc hại:

Có quan Môi sinh SFE đã đưa ra những hướng dẫn đơn giản để giúp bạn mua những sản phẩm an toàn cho sức khỏe.

Nails và sơn móng tay không chứa:

- Toluene
- Diethyl phthalate
- Formaldehyde (formaldehyde) hoặc: chất chất thải ra formaldehyde

Thuốc tẩy móng tay không chứa:

- Ethyl acetate hoặc butyl acetate

Sản phẩm móng tay già không chứa:

- Methyl methacrylate – một hóa chất đã bị cấm bởi Cơ quan Dược phẩm và Thực phẩm Hoa Kỳ (FDA)

Để có thêm thông tin, xin hãy vào thăm trang web:

SFEenvironment.org/nailsalons
CAhealthymanicures.org

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English

Vietnamese

Thank you Swati. To recruit salons to go through the recognition program, we created multilingual brochures for culturally sensitive door-to-door outreach.



Outreach



To enroll salons, we conducted a lot of outreach. A team of staff and interns reached out to every salon in the City – all 280 of them – sometimes TWICE.



Outreach



We went door-to-door to talk to the owners, followed up with them and helped get the salon through the program.



Outreach



We contacted local community organizations, temples and churches that were already doing good work in the space of health and equity.



Outreach

Join San Francisco's Free
Healthy Nail Salon Program!

Get a free
ventilation
unit!*



Besides going door to door to nail salons, we mailed postcards and brochures about the program to all salons



Free and Open



It is important to note that this is a free program open for all.

This is a very unique environmental justice issue that spans the whole city, because there are nail salons in every neighborhood.

We overcame language barriers, we overcame social equality barriers.



Additional Resources



Recognized salons have been supplied with a starter kit of gloves, masks, protective eye goggles and resources on buying and disposing products. Even with the training, it is hard for the salon owner to remember all the chemical names while buying products. Factsheets in Vietnamese talk about which chemicals to avoid and what personal protective equipment to stock up on.



Recognition



Recognition is a key part of our program. Salons that go through our program receive plaques to recognize their efforts in being pioneers in caring for their employees and customers.



Recognition



And we give all salon employees certificates of completion of the training.



Recognition



We have held events where the City officially recognizes them.



Recognition



We recognized the nail salon community



Recognition



They have been provided window decals, posters and brochures to promote themselves.

PRETTY SHOULDN'T STINK

Next time you get your nails done, choose a Healthy Nail Salon.

They use less toxic products, safer practices and better ventilation, so you can breathe easy knowing they are healthier for you, their employees, and the planet.

Now that's beautiful.

Find a Healthy Nail Salon near you ►

LA BELLEZA NO DEBE APESTAR

La proxima vez que vayas a que te arreglen las uñas, elije un Healthy Nail Salon.

Usan productos menos tóxicos, prácticas más saludables y mejor ventilación, por lo tanto podrás respirar tranquila sabiendo que son más saludables para ti, sus empleados, y el planeta.

Eso si que es bello.

Busca un Healthy Nail Salon cerca de ti ►

Once we had a critical mass of 23 salons, we ran a consumer outreach campaign to reward them for their work. After all this effort to recognize salons, we wanted to let customers know about salons in our program.

We allocated funds for a customer outreach campaign. Our campaign, “Pretty Shouldn’t Stink” included multilingual webpages, Facebook ads and bus shelter ads. The bus shelter ads were placed near recognized salons so local customers would not have to look too far for a recognized salon.



Consumer Outreach



We have listed recognized salons on our website sfenvironment.org/healthynails. So far, we have 26 recognized nail salons in SF. By the end of the quarter, we project there will be 30.



Consumer Outreach



We also encourage customers to nudge their salons to join. Very early on, we realized customers like to stay with their salons and their technician. And we could use this to leverage our program.

Our consumer campaigns not only drive more business to recognized salons, but encourage customers to ask their salons to join. As more salons hear about the program, they call us and enroll.



Staffing and Budget



To run a program like this, we have a small budget and staffing.

The ongoing budget for running and maintaining the program are as follows:

Total Budget: \$10,000 + 0.25 FTE

A lot of the staff time goes in recruitment, auditing, training and promotion. Moreover, the recognized salons have to be maintained. Penelope on the left does a lot of the day to day maintaining, recruiting and recognizing of the salons.

Not part of this picture but an integral part of our program is our Vietnamese trainer, Minhthu. Minhthu brings three key important areas of expertise: she is Vietnamese and speaks Vietnamese fluently, is a nail salon technician with more than 10 years of experience and works at the Cancer Prevention Institute of California. She helps in all our communication to the salon employees and salon owners who are not comfortable with English.

Staff Time -

- Recruitment – 0.10 FTE
- Auditing – 0.05 FTE
- Training – 0.05 FTE
- Promotion – 0.05 FTE

Contractual -

- Multilingual trainings and coordination in Vietnamese – \$7,000/yr

Materials and Supplies-

- Printing multilingual materials (awards and training items) – \$2,000
- Personal Protective Equipment - \$500/yr
- Printing of training binders and SDS binders - \$300/yr



Program Budget

Optional Budget: \$89,000 + .5FTE



And then there are things that are good to have:

Research and Development- (one time expenses)

- Research - Contractual – \$17,000
- Development of training material – 0.20 FTE
- Staff Time for research, program design, policy – 0.30 FTE
- Air monitoring– \$7,000 (one time expense)

Consumer outreach campaign- \$38,000 (expenses incurred on a per-campaign basis)

Contractual -

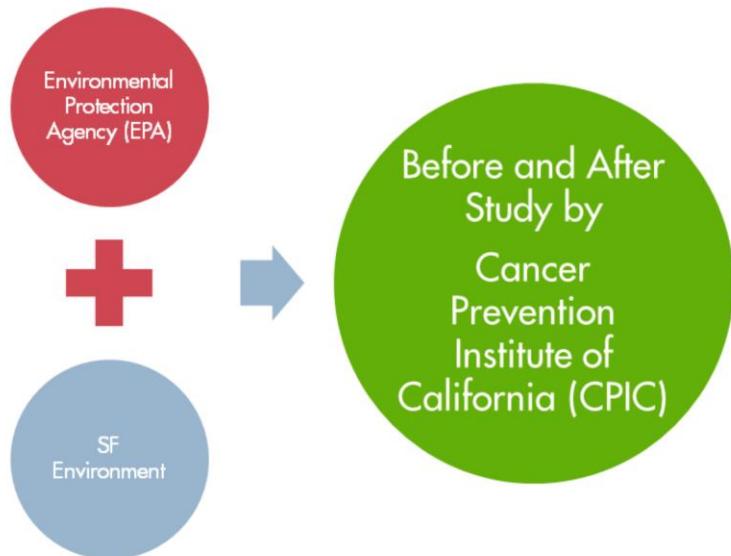
- Translation and interpretation – \$7,000 (one time expense)

Materials and Supplies-

- Ventilation units (optional) – \$15,000
- Printing multilingual materials (decals, certificates, brochures, posters)– \$5,000



Research



Simultaneously, We also wanted to see if our program is effective or not, if the implementation was effective in reducing chemicals that they were exposed to.

We thank EPA for their funding. This was a study that both EPA and SFE funded and CPIC conducted the study. That way we were blinded from it.

Through the Regional Applied Research Effort (RARE), EPA and SFE funded a study in to the air quality in the salons. We were blinded from it. CPIC conducted it. We are very thankful to EPA for funding this crucial study.



Pre-intervention Indoor Air Sampling and analysis

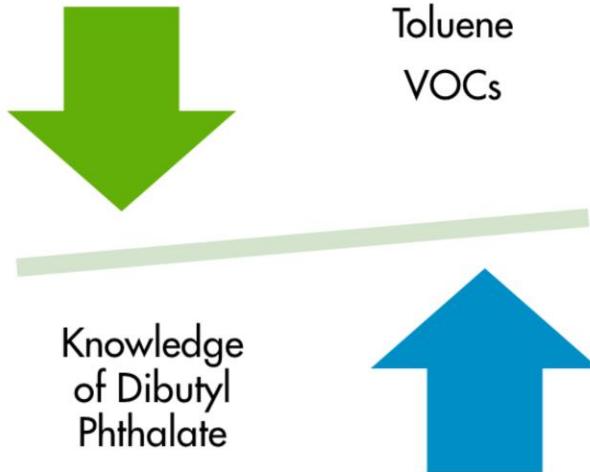
Behavior Intervention-
Program Criteria

Post-intervention Indoor Air Sampling and analysis

There were 2 different groups. We had 11 salons (6 in the intervention and 5 in the control) with 22 employees. The format of the study was to do a pre intervention sampling, then conduct the training and recognition, and conduct a post-intervention sampling and analysis. The pilot study results suggest that the Program may have helped to reduce levels of toluene and TVOCs measured in the salon and increased knowledge regarding healthy workplace practices.



Results



Reduction in:

toluene (-46% in the intervention group vs. 0% in the control group) *not stat sig

TVOC (-19% vs. +47%)

Increase in:

knowledge and awareness of dibutyl phthalates in nail products (+55%)

increased overall knowledge about chemicals in the salon

Because the number of salons and participants were very small, the numbers were not statistically significant

There was a reduction in the chemicals they were inhaling

Increase in the knowledge of safety and precaution.

As Swati mentioned earlier, there are many studies in ventilation that need to be undertaken to make sure they are effective, now that we have salons that have been in the program for 2 and a half years, this would be a good time to do the sampling studies.



Program Essentials

<http://bit.ly/prettyshouldntstink>



So all in all, here are a few elements for a successful program:

Multilingual staff

Multiple staff members

Organization

Flexible hours

Patience

And a lot of Passion

We have distilled it all in a whitepaper you can find on <http://bit.ly/prettyshouldntstink>



The Future



@Donald Durham

So what does the future hold for us? Our goal is to continue to recognize salons and affect policy changes.

When we first started, our aim was to affect changes in policy, better products, better disclosure and greener chemistry. The effort became more and more grassroots and we have created a proof of concept. This is proof enough that salons can be safer and survive and even thrive in this competitive market.

The next step is to make sure this proof of concept gets converted into policy changes. The future is greener products and practices.

www.SFEnvironment.org/NailSalon

Join Us!



Swati Sharma

Senior Commercial
Toxics Reduction Coordinator

Swati.Sharma@SFGov.org

415-355-5005



SF Environment

Our home. Our city. Our planet.
A Department of the City and County of San Francisco

Anya Deepak

Commercial Toxics
Reduction Associate

Anya.Deepak@SFGov.org

415-355-3766

This is a great program for anyone who is interested in it. The investment is moderate, but the reach and impact is very large. All our resources are available to share. So please join us.

Here are our contact details.

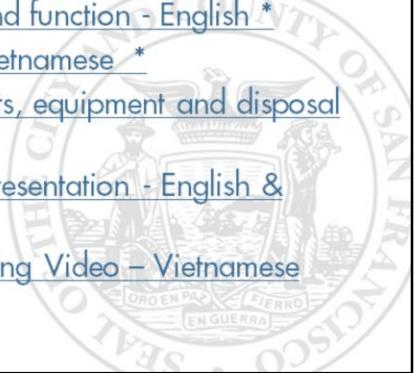
Swati who you heard from is on maternity leave till November

So if you need anything right away, contact me and I will be happy to help.



Additional Resources

- [Healthy Nail Salon White Paper – A summary of the efforts to implement the Healthy Nail Salon Program in San Francisco](#)
- [Healthy Nail Salon Kit \(includes below items with * \)](#)
- [Healthy Nail Salon Registration form - English & Vietnamese *](#)
- [Healthy Nail Salon Application form - English & Vietnamese *](#)
- [Ventilation System Options by brand and function - English *](#)
- [EPA Nail Salon Checklist - English & Vietnamese *](#)
- [Factsheets about choosing safer products, equipment and disposal - English & Vietnamese *](#)
- [Healthy Nail Salon Program Training Presentation - English & Vietnamese *](#)
- [Healthy Nail Salon Program Brief Training Video – Vietnamese with English subtitles](#)





Credits

- For the use of images:
 - Cancer Prevention Institute of California, Berkeley
 - Peter Alexander Photography
 - Salon Belle Linda Nail Salon for staff images
 - MorgueFile.com





WESTERN SUSTAINABILITY & POLLUTION PREVENTION NETWORK

Arizona * California * Hawaii * Nevada * Tribal Lands * Trust Territories

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Thank You for Your Participation!