

**From:** Vela, Monet@OEHHA  
**To:** [Vela, Monet@OEHHA](mailto:Vela.Monet@OEHHA)  
**Subject:** FW: OEHHA peer review request  
**Date:** Thursday, April 16, 2015 3:53:00 PM

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**From:** Duncan Campbell Thomas [<mailto:dthomas@usc.edu>]  
**Sent:** Wednesday, February 25, 2015 6:35 PM  
**To:** Hirsch, Allan@OEHHA  
**Cc:** Vela, Monet@OEHHA  
**Subject:** Re: OEHHA peer review request

This was interesting reading! I've long felt the Prop 65 generic warnings were pretty useless and feel strongly that this is an important step in the right direction. We had a discussion about this during my last term on the Prop 65 SAC back in the late 1980s, so it's great to see OEHHA finally taking the initiative to make this change.

I confess I don't have the expertise to evaluate specific chemicals in any depth, but am happy to respond to your general queries.

1. The criteria for selecting the 12 chemicals requiring specific warnings seem highly appropriate to me. No suggestions for any changes.
2. Each of the 12 specific chemicals on the proposed list seem to be well chosen and all meet the selection criteria in my opinion. Whether there are others that should be added is a more difficult question. There are many obscure chemicals on the full list that I know little (if anything) about, and a few well-known chemicals that aren't among the 12 (e.g., asbestos, aflatoxin, BaP, nickel, tobacco smoke, to name a few), but I understand one has to stop somewhere to avoid falling back into the trap of so many warnings they again get ignored. I don't mean to suggest that I want to nominate those specific chemicals in the previous sentence as additions or substitutions for the list, but perhaps it would be helpful to have a general discussion about the process at a future CIC meeting.
3. I'm glad to see the suggested resources for the public to go to to learn more about specific warnings. The particular ones listed seem quite appropriate to me.

I really learned a lot from reading the "Initial statement of reasons" about the many sources of potential exposure that even I was unaware of. I'm sure many in the general public will be similarly enlightened!

(UNRELATED COMMENT REDACTED)



On Feb 10, 2015, at 3:55 PM, Hirsch, Allan@OEHHA <[Allan.Hirsch@oehha.ca.gov](mailto:Allan.Hirsch@oehha.ca.gov)> wrote:

Dear CIC and DARTIC members:

I am sending you the attached letter requesting your individual peer review of a portion of our proposed warning regulation, which is intended make Proposition 65 warnings more informative and meaningful to the public. We are requesting your review of one specific section of the regulation that would require a subset of listed chemicals to be specifically named in warnings that relate to exposures to those chemicals.

Hard copies of the request letter and the enclosures cited in the letter will be mailed to each of you in the next several days. We are sending this to you electronically so that you can begin your review promptly, if you wish. You do not have to provide us with peer review comments, but we ask that you send us any comments that you may have or indicate to us that you have no comments by April 8, 2015 to Monet Vela of our staff at [monet.vela@oehha.ca.gov](mailto:monet.vela@oehha.ca.gov).

The enclosures cited at the end of the letter are posted on OEHHA's web site and can be accessed by the following links:

1. Notice of Proposed Rulemaking and Announcement of Public Hearing: [www.oehha.ca.gov/prop65/CRNR\\_notices/WarningWeb/NPR\\_Article6.html](http://www.oehha.ca.gov/prop65/CRNR_notices/WarningWeb/NPR_Article6.html)
2. Proposed Regulation: [www.oehha.ca.gov/prop65/CRNR\\_notices/WarningWeb/pdf/ProposedArticle6\\_cleartext.pdf](http://www.oehha.ca.gov/prop65/CRNR_notices/WarningWeb/pdf/ProposedArticle6_cleartext.pdf)
3. Initial Statement of Reasons: [www.oehha.ca.gov/prop65/CRNR\\_notices/WarningWeb/pdf/Article6\\_ISOR.pdf](http://www.oehha.ca.gov/prop65/CRNR_notices/WarningWeb/pdf/Article6_ISOR.pdf)

In addition, here are links to two other information sources cited in the attached letter:

Current list of Proposition 65 chemicals: [www.oehha.ca.gov/prop65/prop65\\_list/Newlist.html](http://www.oehha.ca.gov/prop65/prop65_list/Newlist.html)  
References for chemicals listed in Section 25602: [www.oehha.ca.gov/prop65/warnings/warningrefs.html](http://www.oehha.ca.gov/prop65/warnings/warningrefs.html)

We very much appreciate your continued work on Proposition 65. If you have any questions, please do not hesitate to contact me at (916)322-6325 or [allan.hirsch@oehha.ca.gov](mailto:allan.hirsch@oehha.ca.gov).

Allan Hirsch  
Chief Deputy Director  
Office of Environmental Health Hazard Assessment  
California Environmental Protection Agency  
916-322-6325  
[Allan.hirsch@oehha.ca.gov](mailto:Allan.hirsch@oehha.ca.gov)

<OEHHA warning peer review request letter.pdf>

Duncan C. Thomas, Ph.D.  
Professor, Biostatistics Division  
Verna Richter Chair in Cancer Research  
Dept of Preventive Medicine  
University of Southern California  
2001 N. Soto Street, C-202F, MC 9234  
Los Angeles, CA  
Zip:  
90089-9234 (Postal)  
90033 (FedEx)  
email  
[dthomas@usc.edu](mailto:dthomas@usc.edu)  
phone  
(323) 442-1218  
fax  
(323) 442-2349  
mobile  
(818) 406-8096