



Biology and Biotechnology Research Program

Lawrence Livermore National Laboratory

July 22, 1999

Dr. Val F. Siebal
Chief Deputy Director
Office of Environmental Health Hazard Assessment
301 Capitol Mall, Rm 205
Sacramento, California 95814-4327

Dear Dr. Siebal

I think we have come along way thanks to Dr. Mack and OEHHA staff developing criteria for identifying chemicals for listing by the Slate. What I would like to see addressed is priority for what chemicals get put on the consideration list. We do consider chemicals based on assessment of current exposure and potency criteria. In particular, the question comes up what priority should prescription drugs have compared to environmental chemicals. We clearly faced this dilemma with Tamoxifen. Our committee spent a lot of energy and time evaluating this drug which is prescribed by physicians, which by definition makes access to the chemical by the California Population under a qualified experts control. This seems overkill and against the spirit of Prop. 65.

I would like to propose that we give chemicals for consideration a lower priority for evaluation if they are prescription drugs. With the large number of environmental chemicals still to be evaluated, I think we could do more public health good to concentrate our efforts on chemicals for which the public needs to be warned of their potential carcinogenicity.

Sincerely,

A handwritten signature in black ink that reads "James S. Felton". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

James S. Felton, Ph.D.
Member of Prop. 65 CIC

Cc Dr. George Alexeeff
Dr. Tom Mack