

January 13, 2014

Ms. Cynthia Oshita
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, California 95812-4010

Re: NOIL-TCE

Dear Ms. Oshita:

We, the undersigned community representatives and environmental organizations urge you to complete the listing of trichloroethylene (TCE) as a cause of reproductive toxicity under the Safe Drinking Water and Toxic Enforcement Act of 1986.

The evaluation of TCE toxicity in U.S. EPA's 2011 IRIS Assessment is persuasive, and more recently the Agency for Toxic Substances and Disease Registry, in a study of military families at Camp Lejeune, North Carolina, found that the risk of neural tube birth defects increased with increasing levels of exposure to TCE in the first trimester of pregnancy.

While state and federal environmental regulatory agencies are already applying EPA's toxicity findings to environmental cleanups, TCE is still found in some consumer products. In addition, studies of vapor intrusion from the subsurface into buildings have found unsafe levels of TCE in indoor air from such indoor sources as well as the subsurface. Furthermore, though TCE does not occur in nature, years after most major industrial users in California stopped using this highly toxic compound, it is still found in our outdoor air.

Listing TCE under Proposition 65 would raise awareness of its risks, and it would be a major step forward in eliminating this cancer-causing, reproductive hazard from our environment.

Sincerely,

William Berry, Community Co-Chair, Moffett Field Restoration Advisory Board
Joan Davidson, Sierra Club South Bay Open Space Task Force
Robert Moss, Barron Park Association Foundation, Palo Alto
Penny Newman, Center for Community Action and Environmental Justice
Miriam Rotkin-Ellman MPH, Natural Resources Defense Council
Renee C. Sharp, Environmental Working Group
Lenny Siegel, Center for Public Environmental Oversight
Andria Ventura, Clean Water Action
Christina Walsh, cleanuprocketdyne.org