

## ITI Comments on the Notice of Intent to List: Ethylene Glycol

The Information Technology Industry Council (ITI) thanks you for the opportunity to provide comments on the Notice of Intent to List Ethylene Glycol (CAS # 107-21-1). ITI's member companies have long been leaders in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design, energy efficiency and product stewardship. Available evidence suggests that inhalation and dermal exposure to ethylene glycol (EG) is of minor concern. Ethylene glycol is poorly absorbed through the skin and, while breathing vapors of EG may cause eye and respiratory irritation in high concentration, it is unlikely to cause system toxicity, which is the concern to be addressed under Section 25306(d) of the Safe Drinking Water and Toxic Enforcement Act of 1986, as amended. Therefore, ITI recommends OEHHA adjust the scope of the Intent to List to those products in which exposure through ingestion occurs, and that OEHHA set safe harbor limit related to typical exposure.

The intent to list EG (CASRN 107-21-1) as a developmental toxicant under Prop 65 is based on the NTP monograph that detected developmental abnormalities in animal studies via the oral ingestion pathway. However, data regarding chronic adverse effects via inhalation or dermal exposure is not well-characterized. Epidemiological studies referenced in the NTP monograph show that inhalation exposure concentrations above 200 mg/m<sup>3</sup> resulted in subjects developing eye and respiratory irritation so the fact that inhalation exposure to EG is poorly tolerated provides the warning properties that would prevent sufficiently high inhalation exposures of EG. In other words, only acute adverse effects are expected via inhalation and no adverse effects are expected via dermal exposure.

Under normal use conditions, exposure via ingestion of EG is not expected from IT equipment. We recommend that OEHHA refine the listing of EG by narrowly defining the exposure pathway to oral ingestion only, as there is evidence to suggest EG would not be associated with developmental effects via inhalation or dermal exposure.

ITI and thanks OEHHA for the opportunity to provide these comments on the Notice of Intent to List Ethylene Glycol. We hope to continue working with the department to ensure the final listing has the optimum scope and that an eventual MADL is set at the optimal level to ensure maximum necessary public health protection, while maintaining critical commercial uses of Ethylene Glycol. Please do not hesitate to contact Chris Cleet at (202) 626-5759 or [ccleet@itic.org](mailto:ccleet@itic.org), if you have any questions.

Sincerely,



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## About ITI

The Information Technology Industry Council (ITI) is the premier advocacy and policy organization for the world's leading innovation companies. ITI navigates the relationships between policymakers, companies, and non-governmental organizations, providing creative solutions that advance the development and use of technology around the world. Visit [itic.org](https://itic.org) to learn more.