

From: Lauren Heine <lauren@cleanproduction.org>
To: <fkammerer@oehha.ca.gov>
Date: 8/30/2011 10:12 PM
Subject: Comments on the Green Chemistry Hazard Traits

Dear Fran Kammerer:

Congratulations on doing a thoughtful and comprehensive job compiling a set of hazard traits for use in the TIC

Some comments that I hope will be considered as constructive:

1. Some of the individual organ/system effects are likely to have come from general repeated dose or systemic toxicity test protocols. I think it makes sense to break them out as you have done. However, do you intend to also provide a link to general systemic toxicity test results?. Do you intend to have a category for results for systemic toxicity/repeated dose/organ effects separate from the individual specific effects? I'm thinking that some people might look for results based on test protocols rather than based on specific endpoints.
2. I think it makes sense to include information relevant to nanomaterials. In the exposure category, I would recommend that you also include:
 - structure (eg amorphous or crystalline; type of crystal, length, aspect ratio)
 - surface characteristics (eg charge, coatings, encapsulation)
 - tendency to agglomerate/aggregate or not
 - skin and eye penetration
3. Include also any tendency for specific organ accumulation. You already have identified bioaccumulation but the definition does not seem to include specific organ accumulation

Best wishes for this valuable work

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