

26 July 2017

Michelle Ramirez
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-12B
Sacramento, California 95812-4010

RE: Notice of Intent to List N,N-Dimethylformamide, 2-Mercaptobenzothiazole, and Tetrabromobisphenol A under Proposition 65.

Dear Ms. Ramirez,

We support the listing of N,N-Dimethylformamide (CASN 68-12-2), 2-Mercaptobenzothiazole (CASN 149-30-4), and Tetrabromobisphenol A (CASN 79-94-7) as known to the State of California to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65").

These chemicals meet the requirements for listing via the Labor Code mechanism:

The Statute requires the Proposition 65 list to contain, at a minimum, chemicals identified by the World Health Organization's International Agency for Research on Cancer (IARC) as causing cancer in humans or laboratory animals. Chemicals shall be listed if they have been classified by IARC as:

1. Carcinogenic to humans (Group 1), or
2. Probably carcinogenic to humans (Group 2A) with sufficient evidence of carcinogenicity in experimental animals, or
3. Possibly carcinogenic to humans (Group 2B) with sufficient evidence of carcinogenicity in experimental animals.

In 2016, the IARC classified all three of these chemicals as Group 2A (probably carcinogenic to humans) based on "sufficient evidence of carcinogenicity in experimental animals."¹ The formal IARC assessments of these chemicals are in preparation for inclusion in Volume 115 of the IARC Monographs.² As OEHHA explains, these three chemicals therefore meet the criteria for listing via the Labor Code mechanism specified in Health and Safety Code section 25249.8(a) and Labor Code section 6382(b)(1) and should be listed.

We appreciate the work of OEHHA to protect the health of Californians from hazardous chemicals and thank you for the opportunity to provide comments.

Sincerely,



Avery E. Lindeman, MSc
Deputy Director



Arlene Blum, PhD
Executive Director

¹ Grosse Y, *et al.* (2016). Carcinogenicity of Some Industrial Chemicals. *The Lancet Oncology* **17**(4):419-420. doi: [http://dx.doi.org/10.1016/S1470-2045\(16\)00137-6](http://dx.doi.org/10.1016/S1470-2045(16)00137-6)

² IARC (2016). International Agency for Research on Cancer. World Health Organization. Agents Classified by the IARC Monographs, Volumes 1–115. Available at: http://monographs.iarc.fr/ENG/Classification/latest_classif.php