

**CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT
SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986
(PROPOSITION 65)**

NOTICE OF INTENT TO LIST CHEMICALS BY THE LABOR CODE MECHANISM:

**2-CHLORONITROBENZENE; 1,4-DICHLORO-2-NITROBENZENE;
2,4-DICHLORO-1-NITROBENZENE; 2-AMINO-4-CHLOROPHENOL;
para-NITROANISOLE; *N,N*-DIMETHYLACETAMIDE**

JULY 12, 2019

The California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA) intends to list the following chemicals as known to the state to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65¹). This action is being proposed pursuant to the "Labor Code" listing mechanism². OEHHA has determined that 2-Amino-4-chlorophenol (CAS No. 95-85-2), 2-Chloronitrobenzene (CAS No. 88-73-3), 1,4-Dichloro-2-nitrobenzene (CAS No. 89-61-2), 2,4-Dichloro-1-nitrobenzene (CAS No. 611-06-3), *N,N*-Dimethylacetamide (CAS No. 127-69-5), and *para*-Nitroanisole (CAS No. 100-17-4) meet the criteria for listing as known to cause cancer by this mechanism.

Background on listing by the Labor Code mechanism: Health and Safety Code section 25249.8(a) incorporates California Labor Code section 6382(b)(1) into Proposition 65. The law requires that certain substances identified by the International Agency for Research on Cancer (IARC) be listed as known to cause cancer under Proposition 65. Labor Code section 6382(b)(1) refers to substances identified as human or animal carcinogens by IARC. OEHHA has adopted regulations concerning these listings in Title 27, Cal. Code of Regs., section 25904. As the lead agency for the implementation of Proposition 65, OEHHA evaluates whether a chemical's listing is required by Proposition 65.

OEHHA's determination: 2-Amino-4-chlorophenol, 2-Chloronitrobenzene, 1,4-Dichloro-2-nitrobenzene, 2,4-Dichloro-1-nitrobenzene, *N,N*-Dimethylacetamide, and *para*-Nitroanisole meet the requirements for listing as known to the state to cause cancer for purposes of Proposition 65.

IARC published on its website a list entitled "Agents Classified by the IARC Monographs, Volumes 1 - 123" (IARC, 2018). IARC concludes that there is sufficient evidence of carcinogenicity in animals for 2-Amino-4-chlorophenol, 2-

¹ Health and Safety Code section 25249.5 *et seq.*

² Health and Safety Code section 25249.8(a) and Title 27, Cal.Code of Regs., section 25904.

Chloronitrobenzene, 1,4-Dichloro-2-nitrobenzene, 2,4-Dichloro-1-nitrobenzene, *N,N*-Dimethylacetamide, and *para*-Nitroanisole, and classified these chemicals as Group 2B (“possibly carcinogenic to humans”) ([IARC Monograph Vol 123 Group, 2018](#)).

Opportunity for comment: OEHHA is providing this opportunity to comment as to whether the chemicals identified above meet the requirements for listing as causing cancer specified in Health and Safety Code section 25249.8(a), Labor Code section 6382(b)(1) and Title 27, Cal. Code of Regs., section 25904(b). Because this is a ministerial listing, comments should be limited to whether IARC has identified the specific chemical or substance as a known or potential human or animal carcinogen. Under this listing mechanism, OEHHA cannot consider scientific arguments concerning the weight or quality of the evidence considered by IARC when it identified these chemicals and will not respond to such comments if they are submitted (Title 27, Cal. Code of Regs., section 25904(c)).

Written comments must be received by Monday, August 12, 2019 to be considered. Comments may be submitted electronically (preferred) through our website at <https://oehha.ca.gov/comments>. Comments submitted in paper form can be mailed, faxed, or delivered in person to the address below.

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Comments received during the public comment period will be posted on the OEHHA website after the close of the comment period. By sending us your comments you are waiving any right to privacy you may have in the information you provide. Individual commenters should advise OEHHA when submitting documents to request redaction of home address or personal telephone numbers. Electronic files submitted should not have any form of encryption.

If you have any questions, please contact Mr. Julian Leichthy at julian.leichthy@oehha.ca.gov or at (916) 445-6900.

References

IARC Monograph Vol 123 Group. (2018). Carcinogenicity of some nitrobenzenes and

other industrial chemicals. *The Lancet Oncology*, 19(12):e681-e682, DOI:
[https://doi.org/10.1016/S1470-2045\(18\)30823-4](https://doi.org/10.1016/S1470-2045(18)30823-4)

IARC (2018). International Agency for Research on Cancer. World Health Organization. Agents Classified by the IARC Monographs, Volumes 1–123. Most recent list available at URL: <https://monographs.iarc.fr/list-of-classifications-volumes/>