The California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment (OEHHA) intends to list the chemical identified in the table below as known to the state to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65\(^1\)). This action is being proposed pursuant to the “Labor Code” listing mechanism\(^2\). OEHHA has determined that vinylidene chloride meets the criteria for listing by this mechanism.

<table>
<thead>
<tr>
<th>Chemical</th>
<th>CAS No.</th>
<th>Endpoint</th>
<th>References</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vinylidene chloride</td>
<td>75-35-4</td>
<td>Cancer</td>
<td>IARC (2017); Grosse et al. (2017)</td>
</tr>
</tbody>
</table>

**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 listing 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:** *Vinylidene chloride* meets 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 - 119” (IARC, 2017). IARC concludes that *vinylidene chloride* is classified in Group 2B (“possibly carcinogenic to humans”), and that there is sufficient evidence of carcinogenicity in animals for *vinylidene chloride* (Grosse et al., 2017).

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\(^1\) 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.
Opportunity for comment: OEHHA is providing this opportunity to comment as to whether the chemical identified above meets 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 this chemical 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 5:00 p.m. on Monday, November 6, 2017 to be considered. We encourage you to submit comments in electronic form, rather than in paper form. Comments may be submitted electronically to P65Public.Comments@oehha.ca.gov. Please include “Vinylidene Chloride NOIL” in the subject line. Comments submitted in paper form can be mailed, faxed, or delivered in person to the address below. Hard-copy comments may be mailed, faxed, or delivered in person to the address below.

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

Fax: (916) 323-2265

Street Address: 1001 I Street
Sacramento, California 95814

Comments received during the public comment period will be posted on the OEHHA website after the close of the comment period. Please do not include your address or phone number in your comments if you do not wish for that information to become publically available.

If you have any questions, please contact Ms. Michelle Ramirez at Michelle.Ramirez@oehha.ca.gov or at (916) 445-6900.

References
Grosse Y, Loomis D, Guyton KZ, El Ghissassi F, Bouvard V, Benbrahim-Tallaa, L,