

**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:

**N,N-DIMETHYLFORMAMIDE
2-MERCAPTOBENZOTHIAZOLE
TETRABROMOBISPHENOL A**

JUNE 30, 2017

The California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA) intends to list the chemicals 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 65¹). This action is being proposed pursuant to the "Labor Code" listing mechanism². OEHHA has determined that N,N-dimethylformamide, 2-mercaptobenzothiazole, and tetrabromobisphenol A meet the criteria for listing by this mechanism.

Chemical	CAS No.	Endpoint	References
N,N-Dimethylformamide	68-12-2	Cancer	IARC (2016); Grosse <i>et al.</i> (2016)
2-Mercaptobenzothiazole	149-30-4	Cancer	IARC (2016); Grosse <i>et al.</i> (2016)
Tetrabromobisphenol A	79-94-7	Cancer	IARC (2016); Grosse <i>et al.</i> (2016)

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. As the lead agency for the implementation of Proposition 65, OEHHA evaluates whether a chemical's listing is required by Proposition 65.

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.

OEHHA's determination: *N,N-Dimethylformamide*, *2-mercaptobenzothiazole*, and *tetrabromobisphenol A* meet the requirements for listing as known to the state to cause cancer for purposes of Proposition 65.

IARC has published on its website a list entitled "[Agents Classified by the IARC Monographs, Volumes 1 - 115](#)" (IARC, 2016). IARC concludes that *N,N-dimethylformamide*, *2 mercaptobenzothiazole*, and *tetrabromobisphenol A* are classified in Group 2A ("probably carcinogenic to humans"), and that there is sufficient evidence of carcinogenicity in animals for *N,N-dimethylformamide*, *2 mercaptobenzothiazole*, and *tetrabromobisphenol A* ([Grosse et al., 2016](#)).

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) and Labor Code section 6382(b)(1). Because these are ministerial listings, 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.

Written comments must be received by 5:00 p.m. on Monday, July 31, 2017 to be considered. Comments may be submitted electronically 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 web site after the close of the comment period.

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, Mattock H, and Straif K on behalf of the International Agency for Research on Cancer Monograph Working Group (2016). Carcinogenicity of Some Industrial Chemicals. The Lancet Oncology, Volume 17. Published online February 23, 2016. Available at URL: <http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045%2816%2900137-6/fulltext>

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