

**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

MARCH 4, 2011

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. The Act, commonly known as Proposition 65, is codified in Health and Safety Code section 25249.5 *et seq.* This action is being taken pursuant to the Labor Code mechanism contained in Health and Safety Code section 25249.8(a).

Chemical	CAS No.	Endpoint	Reference
Cyclopenta[<i>cd</i>]pyrene	27208-37-3	Cancer	IARC (2010a; 2010b)
Ethanol in alcoholic beverages	—	Cancer	IARC (2010a; 2010c)
Leather dust	—	Cancer	IARC (2010a)
Salted fish, Chinese-style	—	Cancer	IARC (2010a)

Background on listing by the Labor Code mechanism: Health and Safety Code section 25249.8(a) incorporates California Labor Code Sections 6382(b)(1) and 6382(d) into Proposition 65. The law requires that certain substances identified by the International Agency for Research on Cancer (IARC) or the National Toxicology Program (NTP) 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. Labor Code section 6382(d) refers to substances identified as carcinogens or potential carcinogens by IARC or NTP.

As the lead agency for the implementation of Proposition 65, OEHHA evaluates whether listing under Proposition 65 is required.

OEHHA's determination: *Cyclopenta[cd]pyrene, ethanol in alcoholic beverages, leather dust, and Chinese-style salted fish* each meet the requirements for listing as known to the state to cause cancer for purposes of Proposition 65.

Cyclopenta[cd]pyrene: In 2010, IARC published Volume 92 of its series, *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans* (IARC, 2010b). IARC concluded that (1) there is sufficient evidence in experimental animals for the carcinogenicity of cyclopenta[*cd*]pyrene and (2) cyclopenta[*cd*]pyrene is "probably

carcinogenic to humans” (Group 2A). Therefore, this substance meets the requirements of both Labor Code sections 6382(b)(1) and (d).

Ethanol in alcoholic beverages: In 2010, IARC published Volume 96 of its series, *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans* (IARC, 2010c). IARC concludes that ethanol in alcoholic beverages is classified in Group 1 (the agent is carcinogenic to humans). Therefore, this substance meets the requirements of both Labor Code sections 6382(b)(1) and (d).

Leather dust: IARC has published on its website a list entitled *Agents Classified by the IARC Monographs, Volumes 1-100* (IARC, 2010a). IARC concludes that leather dust is classified in Group 1 (the agent is carcinogenic to humans). Therefore, this substance meets the requirements of both Labor Code sections 6382(b)(1) and (d).

Salted fish, Chinese-style: IARC has published on its website a list entitled *Agents Classified by the IARC Monographs, Volumes 1-100* (IARC, 2010a). IARC concludes that Chinese-style salted fish is classified in Group 1 (the agent is carcinogenic to humans). Therefore, this substance meets the requirements of both Labor Code sections 6382(b)(1) and (d).

Opportunity for comment: OEHHA is committed to public participation in its implementation of Proposition 65. 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). Because these are ministerial listings, comments should be limited to the question 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 identifying a specific chemical or substance and will not respond to such comments if they are submitted.

OEHHA must receive comments by 5:00 p.m. on Monday, April 4, 2011. We encourage you to submit comments in electronic form, rather than in paper form. Comments transmitted by e-mail should be addressed to coshita@oehha.ca.gov. Comments submitted in paper form may be mailed, faxed, or delivered in person to the address below. A public workshop will be held only upon request. Such request must be made in writing to the address below within 10 days from the publication of this notice:

Mailing Address: Ms. Cynthia Oshita
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, California 95812-4010

Fax: (916) 323-8803

Street Address: 1001 I Street
Sacramento, California 95814

If you have any questions, please contact Ms. Oshita at (916) 445-6900.

References

International Agency for Research on Cancer (IARC, 2010a). Agents Classified by the IARC Monographs, Volumes 1–100. World Health Organization. Lyon, France. Accessed October 26, 2010 at URL: <http://monographs.iarc.fr/ENG/Classification/ClassificationsAlphaOrder.pdf>.

International Agency for Research on Cancer (IARC, 2010b). *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans*. Some Non-heterocyclic Polycyclic Aromatic Hydrocarbons and Some Related Exposures. Vol. 92. World Health Organization. Lyon, France.

International Agency for Research on Cancer (IARC, 2010c). *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans*. Alcohol Consumption and Ethyl Carbamate. Vol. 96. World Health Organization. Lyon, France.