

**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:**  
**1,1,1-TRICHLOROETHANE AND LEUCOMALACHITE GREEN**

**MARCH 3, 2023**

The California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA) intends to list 1,1,1-trichloroethane (CAS RN 71-55-6) and leucomalachite green (CAS RN 129-73-7), as known to the state to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65<sup>1</sup>).

This action is being proposed pursuant to the "Labor Code" listing mechanism<sup>2</sup>. OEHHA has determined that these substances meet the criteria for listing 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, California Code of Regulations, section 25904. As the lead agency for the implementation of Proposition 65, OEHHA evaluates whether a chemical's listing is required.

**OEHHA's determination:** *1,1,1-Trichloroethane* and *leucomalachite green* meet the requirements for listing as known to the state to cause cancer for purposes of Proposition 65.

IARC has published on its website "IARC Monographs on the Identification of Carcinogenic Hazards to Humans" Volume 130 "1,1,1-Trichloroethane and Four Other Industrial Chemicals" (IARC, 2022a) and Volume 129 "Gentian Violet, Leucogentian Violet, Malachite Green, Leucomalachite Green, and CI Direct Blue 218" (IARC, 2022b). IARC concluded that *1,1,1-trichloroethane* is "probably carcinogenic to humans" (Group 2A) based on sufficient evidence of carcinogenicity in animals (IARC, 2022a). IARC concluded that *leucomalachite green* is "possibly carcinogenic to humans" (Group 2B) based on sufficient evidence of carcinogenicity in animals (IARC, 2022b).

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<sup>1</sup> Health and Safety Code section 25249.5 *et seq.*

<sup>2</sup> 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 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, California Code of Regulations, 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 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).)

### **Submission of Comments**

All written comments must be submitted to OEHHA by electronic submission, mail, or hand-delivery, by **Monday, April 3, 2023**. OEHHA strongly recommends that comments be submitted electronically through our website at <https://oehha.ca.gov/comments>, rather than in paper form. Alternatively, comments can be submitted in paper form, either by mail or delivered in person.

Electronic Submission (preferred):

Through OEHHA website at: <https://oehha.ca.gov/comments>

Mailed Submission:

Attention: Esther Barajas-Ochoa  
Office of Environmental Health Hazard Assessment  
P. O. Box 4010  
Sacramento, California 95812-4010

In-person delivery submission:

Attention: Esther Barajas-Ochoa  
Office of Environmental Health Hazard Assessment  
1001 I Street, 23rd Floor  
Sacramento, California 95814

OEHHA encourages all commenters to submit their comments in a format compliant with Section 508 of the federal Rehabilitation Act, Web Content Accessibility Guidelines 2.1<sup>3</sup> and California Government Code sections 7405 and 11135, so that they can be read using screen reader technology and people with visual impairments are able to listen to them.

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<sup>3</sup> <https://www.w3.org/WAI/standards-guidelines/wcag/>

Comments received during the public comment period will be posted on the OEHHA website after the close of the comment period.

OEHHA is subject to the California Public Records Act and other laws that require the release of certain information upon request. If you provide comments, please be aware that your name, address, and e-mail may be available to third parties.

If you have any questions, please contact Esther Barajas-Ochoa at [Esther.Barajas-Ochoa@oehha.ca.gov](mailto:Esther.Barajas-Ochoa@oehha.ca.gov) or at (916) 445-6900.

## **References**

International Agency for Research on Cancer (IARC, 2022a). IARC Monographs on the Identification of Carcinogenic Hazards to Humans, Volume 130. 1,1,1-Trichloroethane and Four Other Industrial Chemicals. IARC, World Health Organization, Lyon, France. Available from <https://publications.iarc.fr/611>.

International Agency for Research on Cancer (IARC, 2022b). IARC Monographs on the Identification of Carcinogenic Hazards to Humans, Volume 129. Gentian Violet, Leucogentian Violet, Malachite Green, Leucomalachite Green, and CI Direct Blue 218. IARC, World Health Organization, Lyon, France. Available from <https://publications.iarc.fr/603>