

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 CHEMICAL BY THE LABOR CODE MECHANISM:
ANTIMONY (TRIVALENT COMPOUNDS)

SEPTEMBER 30, 2022

The California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA) intends to list antimony (trivalent compounds) 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 mechanism.² OEHHA has determined that this substance meets 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, 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.

OEHHA's determination: *Antimony (trivalent compounds)* meets 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 - 132" (IARC, 2022). IARC concludes that *antimony (trivalent compounds)* is "probably carcinogenic to humans" (Group 2A) based on limited evidence for cancer in humans, sufficient evidence of carcinogenicity in experimental animals, and strong mechanistic evidence in human primary cells and in experimental systems (Karagas *et al.*, 2022).

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

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.

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 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, October 31, 2022**. 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, by either 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 2.1³ and California Government Code sections 7405 and 11135, so that they can be read using screen reader technology and those with visual impairments are able to listen to them.

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

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

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 or at (916) 445-6900.

References

International Agency for Research on Cancer (IARC, 2022). Agents Classified by the *IARC Monographs*, Volumes 1-132. IARC, World Health Organization, Lyon, France. Most recent list available at URL: <https://monographs.iarc.who.int/list-of-classifications/> [Accessed July 7, 2022].

Karagas MR, Wang A, Dorman DC, Hall AL, Pi J, Sergi CM, Symanski E, Ward EM, Arrandale VH, Azuma K, Brambila E, Calaf GM, Fritz, JM, Fukushima S, Gaitens JM, Grimsrud TK, Guo L, Lynge E, Marinho-Reis AP, McDiarmid MA, Middleton DRS, Ong TP, Polya DA, Quintanilla-Vega B, Roberts GK, Santonen T, Sauni R, Silva MJ, Wild P, Zhang CW, Zhang Q, Grosse Y, Benbrahim-Tallaa L, de Conti A, DeBono NL, El Ghissassi F, Madia F, Resifeld B, Stayner LT, Suonio E, Viegas S, Wedekind R, Ahmadi S, Mattock H, Gwinn WM, Schubauer-Berigan MK. Carcinogenicity of cobalt, antimony compounds, and weapons-grade tungsten alloy. *The Lancet Oncology* 23(5), 577-578. Published online April 7, 2022, doi: 10.1016/S1470-2045(22)00219-4. Available at URL: [https://www.thelancet.com/journals/lanonc/article/PIIS1470-2045\(22\)00219-4/fulltext](https://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(22)00219-4/fulltext) [Accessed April 18, 2022]