

**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 A CHEMICAL BY THE LABOR CODE MECHANISM:  
VINYLIDENE CHLORIDE**

**SEPTEMBER 22, 2017**

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<sup>1</sup>). This action is being proposed pursuant to the "Labor Code" listing mechanism<sup>2</sup>. OEHHA has determined that vinylidene chloride meets the criteria for listing by this mechanism.

<b>Chemical</b>	<b>CAS No.</b>	<b>Endpoint</b>	<b>References</b>
Vinylidene chloride (1,1-Dichloroethylene)	75-35-4	Cancer	IARC (2017); Grosse <i>et al.</i> (2017)

**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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<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 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](mailto: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 web site 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](mailto: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 (2017). Some chemicals that cause tumours of the urinary tract in rodents. The Lancet Oncology, Volume 17. Published online June 27, 2017. Available at URL: [http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045\(17\)30505-3/fulltext](http://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(17)30505-3/fulltext)

IARC (2017). International Agency for Research on Cancer. World Health Organization. Agents Classified by the IARC Monographs, Volumes 1–119. Most recent list available at URL: [http://monographs.iarc.fr/ENG/Classification/latest\\_classif.php](http://monographs.iarc.fr/ENG/Classification/latest_classif.php)