Att. Thomas J. Lentz, Crystal D. Forester, Liying Rojanasakul National Institute for Occupational Safety and Health 1090 Tusculum Avenue Cincinnati, OH 45226-1998 USA



Date:	December 11, 2018	Your ref:	Letters dated September 21 and October 2, 2018	E-mail:	draftOSH@gr.nll
Encl:	1	Our ref:	1455667/BS/pm/246-L21	Phone:	070 340 7520

Subject: Comments on public draft report 2,4-dichloro-1-nitrobenzene and 1,4-dichloro-2-nitrobenzene

Dear Mr. Lentz, Mr/Mrs. Rojanasakul and Mrs. Forester,

Thank you for accepting the invitation to comment on the draft report 2,4-dichloro-1nitrobenzene and 1,4-dichloro-2-nitrobenzene, which was published for public review in July 2018 by the Subcommittee on the classification of carcinogenic substances of the Dutch Expert Committee on Occupational Safety of the Health Council of the Netherlands. The Subcommittee highly appreciates the comments made by NIOSH, which enabled the subcommittee to modify and improve its report. On behalf of the President of the Health Council, I give you a reply.

General comment Mr/Mrs. Rojanasakul:

Most critical studies were included. Consider adding: Wilkerson MG, Connor TH, Wilkin JK [1988]. Dinitrochlorobenzene is inherently mutagenic in the presence of trace mutagenic contaminants. Arch Dermatol. 124(3):396-398.

Reply: The aim of the study of Wilkerson et al. was to characterize the effects of traces of known mutagens, e.g., 2,4-dichloronitrobenzene, on a new, commercially available grade of 2,4-dinitrochlorobenzene in the Ames assay. After careful consideration, the Subcommittee decided that this study was not relevant in view of the evaluation of the genotoxicity of the two dichloronitrobenzenes.

Specific Comments Mr/Mrs. Rojanasakul:

- Suggest mentioning that: "The present study was conducted with reference to the OECD Guideline for Testing of Chemicals 451 "Carcinogenicity Studies" (ORCD 1981) and were carried out in conformity with the OECD Principle of Good Laboratory Practice (OECD 1998) where using Ref.#16 Kano et al.."
- Reference resource may include the PubChem (https://pubchem.ncbi.nlm.nih.gov), which provides cancer-related information for "compound/2_4-dichloronitrobenzene," such as Hazards Identification, and mutation toxicity.
- Reference resource may include: https://toxnet.nlm.nih.gov/cg-ibin/sis!search/a?dbs+hsdb :@term+@DOCNO+4267.

Reply: Thank you for your suggestions. A modification has been made under "5.2.1 Non-human information."



Specific comments Mrs. C. Forester:

A mention of a report of the Advisory Group to Recommend Priorities for IARC Monographs during 2015-2019 citing these as priority chemicals is suggested. *Reply*: A modification has been made under "2.3 International classifications".

The final advisory report '2,4-dichloro-1-nitrobenzene and 1,4-dichloro-2-nitrobenzene' was published on December 11, 2018. It can be found on the website of the Health Council. Also your comments and this letter can be found on the website. The comments and replies by the Committee are available for the public.

Best regards,

Beitske E. Smink, Ph.D. Scientific secretary