



Centers for Disease Control and Prevention
National Institute for Occupational
Safety and Health
Robert A. Taft Laboratories
4676 Columbia Parkway
Cincinnati, OH 45226-1998
May 14, 2012

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DECOS subcommittee 246
The Health Council
Attn: Mr. SR Vink
PO Box 16052
2500 BB The Hague
The Netherlands

Dear Mr. Vink:

Thank you for the opportunity to review the draft report on *1,1,1-Trichloroethane* prepared by the Subcommittee on the Classification of Carcinogenic Substances of the Dutch Expert Committee on Occupational Safety (DECOS).

If you have any questions regarding the comments please contact me at 513-533-8260 (telephone) or by Email at tbl7@cdc.gov.

Sincerely yours,

Thomas J. Lentz, Ph.D., M.P.H.
Branch Chief
Document Development Branch
Education and Information Division

1 Enclosure

NIOSH Comments on 1,1,1-Trichloroethane by James O'Callaghan, Health Effects Laboratory Division, NIOSH, 1095 Willowdale Rd., Morgantown, WV 26505-2888

Executive Summary: A review of the entire document and a search of several databases by this reviewer indicate that the brief statements made in this summary are correct. Essentially, not enough data exist to evaluate the carcinogenic properties of 1,1,1-trichloroethane. Nevertheless, there isn't much of a summary to the "Executive Summary"; in essence, the statement is just re-phrasing of the EU classification corresponding to category 3, subcategory b. Perhaps a slightly expanded statement could be included to indicate the basis for concluding that n-butyl glycidyl ether has not been sufficiently investigated (e.g. lack of total number of studies, quality of existing data, types of studies conducted). This reviewer is, however, mindful of the need to state conclusions in the form of standard phrases and perhaps this requirement dictates the brevity of the Summary as written.

Scope:

1.1: Background: Adequate

1.2: Subcommittee and procedures: straightforward; Dr. Woultersen and his colleagues, notably at the Leiden University Medical Center have strong credentials in the subject area of the report and their prior recommendations should be viewed as authoritative

1.3: Data: while an IARC report is available on 1,1,1-TCE, the conclusions reached in the IARC report concur with those in the present document: insufficient animal and human data with which to reach a conclusion.

General Information:

2.1. If possible, a statement regarding whether 1,1,1-TCE usage is increasing or decreasing should be considered. If usage is stable or increasing these data might be used to support continued evaluation of the carcinogenicity and mutagenicity of the compound.

Is there environmental fate and pathway data available for this compound? Is it biodegradable?

3.0 Carcinogenicity studies

Studies and data obtained in humans and animals are inadequate to reach a conclusion; flaws in sample size, study design and methods all contribute to the problem

4.0 Genotoxicity

Equivocal or inconsistent in vitro and in vivo assay results do not allow a conclusion to be reached.

5.1. This reviewer concurs with the evaluation as stated

5.2. This reviewer concurs with the recommendation for classification as proposed

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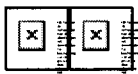
Van: Virginia Galvez Perez [vgalvezp@insht.meys.es]
Verzonden: maandag 14 mei 2012 10:37
Aan: Vink, dhr. S.R.
Onderwerp: U-7019/BV/fs/246-X15

Dear Mr. Vink,

In response to your letter of February 17, 2012 reference U-7019/BV/fs/246-X15, subject: draft documents talk and 1,1,1-trichloroethane, I would like to tell you that I have only a comment for your 1,1,1-trichloroethane draft. In pag. 8 EU classification (**Regulation on classification, labelling and packaging of substances and mixtures**(CE) No 1272/2008 of the European Union) I think you have to include **H420 (hazardous to the ozone layer)**.

Kind regards

Virginia Gálvez Pérez
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