



Centers for Disease Control and Prevention  
National Institute for Occupational  
Safety and Health  
Robert A. Taft Laboratories  
4676 Columbia Parkway  
Cincinnati, OH 45226-1998  
September 6, 2012

The Health Council of the Netherlands  
**Attn: Mr. G.B. van der Voet**  
PO Box 16052  
2500 BB The Hague  
The Netherlands

Dear Mr. van der Voet:

Thank you for the opportunity to review the draft report on *Trichloroacetic acid* 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](mailto:tbl7@cdc.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Tom Lentz".

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

1 Enclosure

**NIOSH Comments on Trichloroacetic acid by Linda Sargent, Health Effects Laboratory Division, NIOSH, 1095 Willowdale Rd., Morgantown, WV 26505-2888**

The document authored by the Dutch Committee on Occupational Safety did a good job in covering the important literature. Recommend the inclusion of one additional paper: Sungkyoon Kim, David Kim, Gary M. Pollack, Leonard B. Collins, Ivan Rusyn, Pharmacokinetic analysis of trichloroethylene metabolism in male B6C3F1: Formation and disposition of trichloroacetic acid, dichloroacetic acid, S-(1,2-dichlorovinyl)glutathione and S-(1,2-dichlorovinyl)-L-cysteine Toxicol Appl Pharmacol. 2010.

The authors did a good job describing the dose, the route of exposure, the length of dosing schedule as well as the length of time between exposure and analysis. The report was presented in sufficient details to evaluate the findings of the research that were discussed.

The report does not need to be condensed.

The report described the limitations of the research that was discussed.

Trichloroacetic acid (TCA) is carcinogenic in male mice but not in female mice. Rats exposed to TCA do not develop a significant tumor response. There is no published evidence of TCA-induced tumors in human. The committee presented convincing evidence that there was insufficient data to determine whether Trichloroacetic acid is a human carcinogen.