



July 26, 2021

Mr. Tyler Saechao
California Environmental Protection Agency
Office of Environmental Health Hazard Assessment
1001 I Street
P.O. Box 4010, MS-12B
Sacramento, California 95812-4010

RE: Notice of Intent to List Chemicals by the Labor Code Mechanism: Tetrahydrofuran; 2-ethylhexyl Acrylate; Methyl Acrylate; and Trimethylolpropane Triacrylate, Technical Grade

The Adhesive and Sealant Council (ASC) is a North American trade association representing 89 manufacturers of adhesives, sealants and the suppliers of raw materials to the industry.

ASC has reviewed the Office of Environmental Health Hazard Assessment's (OEHHA) June 11th proposed rulemaking with regard to listing four new substances on Proposition 65, some of which have uses in adhesives and/or sealants.

Regarding one of the substances—2-ethylhexyl acrylate—the Council is concerned about the testing used to determine the carcinogenicity of 2-EHA. Per the IARC Monograph summary¹ for 2-EHA, the only study used to qualify 2-EHA as a carcinogen is the study utilizing C3H/HeJ mice line. As pointed out in the Elmetts and Yusuf paper², this line of mice is rather inappropriate for determining the capacity of a chemical to cause cancer in the chronic term.

Additionally, the dosages used in this study far exceed any sort of standard scenario. Therefore, the generalization of this data to confirm that 2-EHA as a carcinogen is questionable. Without any other corroborating evidence, the Council argues that this is insufficient for classification under the IARC standard, and therefore should not be considered for listing under Proposition 65.

¹ International Agency for Research on Cancer, *ISOBUTYL NITRITE, β -PICOLINE, AND SOME ACRYLATES*, Vol. 122 (World Health Organization, 2019), page 148.

² Craig Elmetts & Nabiha Yusuf, *Murine Skin Carcinogenesis and the Role of Immune System Dysregulation in the Tumorigenicity of 2-Ethylhexyl Acrylate*, (S. Karger AG, Basel, 2020).

ASC and its members would appreciate further clarification by OEHHA that makes a convincing case for listing 2-EHA under Proposition 65. In the absence of such, ASC recommends OEHHA not continue with further action.

If you have any questions, please contact me at (301) 986-9700 ext. 1111.

Best regards,

A handwritten signature in blue ink, appearing to read "W. Allmond", with a stylized flourish at the end.

William Allmond
President
The Adhesive and Sealant Council