



March 12, 2024

Submitted via Email

Dr. Lauren Zeise, Director

Dr. David Edwards, Chief Deputy Director

Dr. Kannan Krishnan, Chief, Air and Site Assessment and Climate Indicators Branch

Office of Environmental Health Hazard Assessment

1001 I Street

Sacramento, California 95812

Re: ACC Follow-Up Comments on Scientific Review Panel Review for Ethylene Oxide IUR

Dear Drs., Zeise, Edwards, and Krishnan:

The Ethylene Oxide Panel (EO Panel) of the American Chemistry Council (ACC) appreciates the opportunity to provide additional comments to the Office of Environmental Health Assessment (OEHHA) and the Scientific Review Panel (SRP) on OEHHA's proposed Cancer Inhalation Unit Risk Factor for ethylene oxide (EtO). The EO Panel includes the major producers and users of EO in North America.

These comments supplement our previous comments on the draft IUR and address significant points and possible misstatements made during the February 2, 2024 meeting with the SRP. Please note the attached ACC comments and slide presentation.

We urge OEHHA to consider this information and conduct a major, independent technical review of the important issues involved with developing the EtO IUR. Thank you.

Sincerely,

*William Gulledge*

William Gulledge

Senior Director

Chemical Products & Technology Division

Cc: Dr. Arash Mohegh, Air Resources Board

Attachments:

1. Post-Meeting Comments To The California Air Resources Board Scientific Review Panel (SRP) On Toxic Air Contaminants On The Draft OEHHA Inhalation Unit Risk
2. Appendix A- ACC Comments on Draft Cancer Inhalation Unit Risk Factor for Ethylene Oxide, June 14, 2023
3. Appendix B- ACC Comments on Draft Cancer Inhalation Unit Risk Factor (IUR) for Ethylene Oxide Submitted to Scientific Review Panel on Toxic Air Contaminants, January 26, 2024
4. Appendix C- Oral Comments Presented to Scientific Review Panel on Toxic Air Contaminants, February 2, 2024