

VIDEOCONFERENCE MEETING  
STATE OF CALIFORNIA  
ENVIRONMENTAL PROTECTION AGENCY  
AIR RESOURCES BOARD  
SCIENTIFIC REVIEW PANEL  
ON TOXIC AIR CONTAMINANTS

ZOOM PLATFORM

FRIDAY, OCTOBER 15, 2021  
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APPEARANCES

PANEL MEMBERS:

Cort Anastasio, Ph.D., Chairperson

Ahmad Besaratinia, Ph.D.

Paul D. Blanc, M.D.

S. Katharine Hammond, Ph.D.

Michael T. Kleinman, Ph.D.

Joseph R. Landolph, Jr., Ph.D.

Karen Messer, Ph.D.

Lisa A. Miller, Ph.D.

Beate R. Ritz, M.D., Ph.D., M.P.H.

REPRESENTING THE AIR RESOURCES BOARD:

Patrick Gaffney, Staff Air Pollution Specialist, Criteria Pollutant and Air Toxics Reporting Section, Greenhouse Gas and Toxics Emission Inventory Branch, Air Quality Planning and Science Division

Anne Klein, Air Pollution Specialist, Toxics Inventory and Special Projects Section, Air Quality Planning & Science Division

Lori Miyasato, Ph.D., Panel Liaison

Gabe Ruiz, Manager, Toxics Inventory & Special Projects, Air Quality Planning & Science Division

REPRESENTING THE OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT:

John Budroe, Ph.D., Chief, Air Toxicology and Risk Assessment Section

Daryn Dodge, Ph.D., Air Toxicology and Risk Assessment Section

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1. Welcome and Introductions 1
  
2. Review of "1-Bromopropane Cancer Inhalation Unit Risk Factor" - Scientific Review Panel Draft - September 2021. 5

Office of Environmental Health Hazard Assessment (OEHHA) staff will present a draft document summarizing the carcinogenicity and derivation of a cancer inhalation unit risk factor (IUR) for 1-bromopropane (1-BP). Cancer IURs are used to estimate lifetime cancer risks associated with inhalation exposure to a carcinogen.

OEHHA is required to develop guidelines for conducting health risk assessments under the Air Toxics Hot Spots Program (Health and Safety Code Section 44360 (b)(2)). In response to this statutory requirement, OEHHA develops IURs for many air pollutants.

3. AB 2588 Air Toxics "Hot Spots" Emission Inventory Criteria and Guidelines (EICG) regulation.

Part I. Update on the Amendments to the EICG Regulation

65

The California Air Resources Board (CARB or Board) compiles air toxics emissions data for stationary sources as required by the Air Toxics "Hot Spots" Act (Health and Safety Code section 44300 et seq.; AB2588, Connelly). Under this program, stationary source facilities are required to report the types and quantities of toxic substances they routinely release into the air. The goals of this program are to compile information on toxics emissions; identify facilities having potential for localized impacts; evaluate their health risks; notify nearby residents about significant risks; and ultimately reduce the risks below a health protective threshold. As part of evaluating emissions, CARB is responsible for updating the list of chemicals that must be reported. The SRP has played an important role in reviewing,

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providing input to, and supporting the framing and scope of the proposed updates to the chemical list.

On November 19, 2020, the Board adopted amendments to the Air Toxics "Hot Spots" Emission Inventory Criteria and Guidelines (EICG) Regulation. In this meeting, CARB staff will provide a brief recap of the amendment process for the Air Toxics "Hot Spots" EICG Regulation.

Part II. Prospective Discussion of AB 2588 Program. 77

Ensuring the long-term success of the AB 2588 Air Toxics "Hot Spots" Program will require periodic updates of the pollutant list to regularly add emerging chemicals. CARB staff will provide questions to the Panel members, inviting discussion on potential pathways the program might follow with respect to future updates to its chemical list and program implementation.

Following Part II of this update, the Panel will have an opportunity to hear public comment on the item and discuss potential ways in which the Panel might support improvements in air quality and health protection at the community level.

4. Consideration of administrative matters.	
The Panel may discuss various administrative matters and scheduling of future meetings	109
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PROCEEDINGS

1  
2 CHAIRPERSON ANASTASIO: Good morning and welcome  
3 to the October 15th, 2021 meeting of the Scientific Review  
4 Panel. I'd like to welcome everybody to the webcast. I'd  
5 like to thank the Panel members for attending today. I  
6 want to remind everyone that this will be recorded and is  
7 being recorded. We're going to start with Panel  
8 introductions.

9 Before we do that, I'm happy to say that Paul  
10 Blanc has been reappointed as the Senate Rules appointee  
11 in occupational medicine and Mike Kleinman and Beate  
12 Ritz's reappointments were announced earlier this year.  
13 So thank you for joining us for another term, Paul. We  
14 appreciate it.

15 I'm just going to call out Panel members in order  
16 on my screen. Please just briefly introduce yourself.

17 Mike.

18 PANEL MEMBER KLEINMAN: Good morning. I'm Mike  
19 Kleinman. I'm a professor in the Department of  
20 Occupational and Environmental Health in UC Irvine and I'm  
21 the co-director of the Air Pollution Health Effects  
22 Laboratory.

23 CHAIRPERSON ANASTASIO: Great. Thank you, Mike.  
24 Joe.

25 PANEL MEMBER LANDOLPH: I'm Joe Landolph, Jr. I

1 have a PhD. I'm associate professor of molecular and  
2 microbiology, and pathology, and immunology, and a member  
3 of the USC Norris Comprehensive Cancer Center at the  
4 University of Southern California. And I study cell  
5 transformation and mutagenesis in mammalian cells.

6 CHAIRPERSON ANASTASIO: Okay. Thank you, Joe.  
7 Karen.

8 PANEL MEMBER MESSER: Good morning. I'm a  
9 professor in the Division of Biostatistics at the Wertheim  
10 School of Public Health at UC San Diego in their Health  
11 Sciences. I'm the Director of Biostatistics at the UCSD  
12 Moores Cancer Center.

13 CHAIRPERSON ANASTASIO: Thank you, Karen.  
14 Lisa.

15 PANEL MEMBER MILLER: Good morning. I'm Lisa  
16 Miller. I'm a professor in the School of Veterinary  
17 Medicine. And I serve as the Associate Director of  
18 Research at the California National Primate Research  
19 Center. And my expertise is in respiratory immunology,  
20 primarily in large animal models.

21 CHAIRPERSON ANASTASIO: Thank you, Lisa.  
22 Ahmad.  
23 Sorry, Ahmad?

24 PANEL MEMBER BESARATINIA: I'm sorry. Good  
25 morning. This is Ahmad. I'm a professor of preventive

1 medicine at Keck School of Medicine of USC here in Los  
2 Angeles. I'm a cancer biologist by training and my  
3 research areas are on environmental carcinogenesis.

4 CHAIRPERSON ANASTASIO: Great. Thank you, Ahmad.  
5 Beate.

6 PANEL MEMBER RITZ: I'm Beate Ritz. I'm a MD,  
7 PhD, epidemiologist. I'm also co-appointed in  
8 environmental health and in neurology at the UCLA Schools  
9 of Public Health and of Medicine. And my research focuses  
10 on environmental epidemiology, mostly pesticide and air  
11 pollution exposures in just about every outcome.

12 CHAIRPERSON ANASTASIO: Okay. Thank you, Beate.  
13 Kathy.

14 PANEL MEMBER HAMMOND: Good morning. I am a  
15 professor of environmental health sciences at the School  
16 of Public Health at Berkeley. And my research area  
17 focuses on exposure assessment for both occupational and  
18 environmental epidemiology sets.

19 PANEL MEMBER BLANC: Kathy, there's something not  
20 right with your sound. I don't know if it's the ear  
21 phones or what it is.

22 PANEL MEMBER HAMMOND: Got it. Do you want me to  
23 repeat that, Cort?

24 CHAIRPERSON ANASTASIO: No, I think we're good.  
25 We could catch it, but thank you, Paul. Yeah, you're much

1 clearer now.

2 PANEL MEMBER HAMMOND: Good.

3 CHAIRPERSON ANASTASIO: Okay. And our newest  
4 member, Paul Blanc.

5 PANEL MEMBER BLANC: Oh, yeah. This all reminds  
6 me, you know, once I was introduced to Dolly Parton. And  
7 I was introduced as an expert in environmental causes of  
8 cancer. And Dolly looked at me and she said, "Oh, my.  
9 Doesn't that sound impressive"?

10 Well, I'm very impressed by everybody's  
11 expertise. And I'm just a poor country lawyer, but I also  
12 am at the University of California, San Francisco in  
13 occupational and environmental medicine and also am  
14 trained in medical toxicology.

15 CHAIRPERSON ANASTASIO: Great. Thank you, Paul.

16 And I'm Cort Anastasio. I'm Chair of the Panel  
17 and I'm a professor in the Department of Land, Air, and  
18 Water Resources at UC Davis, and I'm an atmospheric  
19 chemist.

20 So to move on to the meeting. We have two major  
21 items today. The first will be from OEHHA. It's  
22 1-bromopropane cancer inhalation unit risk factor. And  
23 the second major item is from CARB. It's the AB 2588 air  
24 toxic hot spots emissions inventory criteria and  
25 guidelines regulation.



1           The AB 2588 presentation is going to be in two  
2 parts. The first part will be a retrospective discussing  
3 what CARB has done over the past few years related to  
4 updating Appendix A of the EICG. And then the second part  
5 will be a prospective looking forward to next rounds of  
6 additions of chemicals to Appendix A.

7           So we are going to accept verbal and written  
8 through the chat public comments only on part two, only on  
9 the prospective part. So if people want to comment on  
10 that, they can later.

11           All right. So we're going to start off with a  
12 bang, the 1-bromopropane Cancer inhalation risk -- unit  
13 risk factor document. Before we get into the details of  
14 that, I want to introduce the new Chief of the Air and  
15 Site Assessment and Climate Indicators Branch at OEHHA,  
16 Dr. Kannan Krishnan. His branch oversees the development  
17 of these health risk assessments under the air toxic hot  
18 spots program, such as the 1-bromopropane IUR we'll be  
19 discussing today.

20           So Dr. Krishnan, would you like to say a few  
21 words?

22           DR. KRISHNAN: Thank you. Good morning,  
23 everyone. Welcome to the session today. I am Kannan  
24 Krishnan, as mentioned previously, and the Chief of Air  
25 and Site Assessment and Climate Indicators Branch at OEHHA

1 since July of this year.

2 Prior to coming to OEHHA, I was a professor and  
3 Chair of the Department of Occupational and Environmental  
4 Health at the University of Montreal, Canada, where I was  
5 also Associate Dean of Research at the School of Public  
6 Health.

7 Most recently, I was the Chief Scientific Officer  
8 of the Quebec Occupational Health and Safety Research  
9 Institute. I'm a toxicologist by training and recognized  
10 for contributions in the area of physiologically based  
11 pharmacokinetic modeling - it's called PBPK modeling - and  
12 its applications in risk assessment, a variety of like  
13 high dose to low dose, route to route, interindividual, as  
14 well as population variability of a number of chemicals,  
15 as well as we work on structure property relationship  
16 modeling and mixtures toxicology.

17 Wonderful being here and I look forward to the  
18 proceedings today. Thank you.

19 CHAIRPERSON ANASTASIO: Great. Thank you, Dr.  
20 Krishnan. Welcome to California and welcome to California  
21 EPA.

22 Okay. So we're going to go start with a  
23 1-bromopropane cancer inhalation unit risk factor. This  
24 document from the Office of Environmental Health Hazard  
25 Assessment was released for public review and comment on

1 May 7th, 2021. The document was revised and the  
2 Scientific Review Panel, or SRP, draft, which is dated  
3 September 2021, was sent to the full Panel for review and  
4 was also posted on OEHHA's webpage for the public.

5 Today, we're going to start with a presentation  
6 from OEHHA staff on the proposed cancer inhalation unit  
7 risk factor for 1-bromopropane. And then we'll have a  
8 discussion of the Panel and we'll give our feedback to  
9 OEHHA staff on this IUR. So to start, I'm going to  
10 introduce Dr. Don -- John Budroe who's chief of OEHHA's  
11 Air Toxicology and Risk Assessment Section.

12 John.

13 DR. BUDROE: Good morning. And thank you, Dr.  
14 Anastasio. And in turn, I would like to introduce Dr.  
15 Daryn Dodge. He's the lead on the 1-bromopropane cancer  
16 inhalation unit risk factor document and he'll be making  
17 presentation on the document.

18 Unfortunately, his webcam is not working this  
19 morning, but his audio is. So although you won't be able  
20 to see him, you will be able to hear him and the slides  
21 will be presented.

22 Dr. Dodge.

23 DR. DODGE: Thank you, Dr. Budroe.

24 Are the slides going to be coming up here in a  
25 moment?

1 (Thereupon a slide presentation.)

2 DR. DODGE: Okay. I'll get started.

3 Okay. I'll begin by talking about -- a little  
4 bit about the chemical itself and why we chose to derive  
5 and inhalation unit risk factor for 1-bromopropane. And  
6 then we'll go -- or I'll go step by step on how we derived  
7 the cancer inhalation unit risk factor.

8 Okay. Next slide.

9 --o0o--

10 DR. DODGE: 1-bromopropane is also referred to  
11 as n-propyl bromide, although in most publications you'll  
12 see it named as 1-bromopropane. It's a colorless liquid  
13 at room temperature, but with aging it turns yellow-ish.  
14 It's soluble in organic solvents and slightly soluble in  
15 water, 2,450 milligrams per liter of water. It has a  
16 boiling point of 71 degrees Celsius. And the vapor  
17 pressure is 110.8 millimeters mercury, so it's considered  
18 a volatile organic chemical.

19 Okay. Next slide.

20 --o0o--

21 DR. DODGE: 1-bromopropane is currently listed as  
22 a carcinogen under the California Proposition 65 Program.  
23 It is also listed by the International Agency for Research  
24 on Cancer, or IARC, as a Group 2B carcinogen, or otherwise  
25 possibly carcinogenic to humans.

1           Its uses primarily is as a solvent vehicle for  
2 adhesives in laminates and foam products, and as  
3 degreasing or cleaning agent for metals, plastics, optics  
4 and electronics.

5           It is promoted as an alternative to ozone  
6 depleting chlorofluorocarbons. And that is one of the  
7 reasons we saw increased use of this occupationally as a  
8 solvent in degreasing agents starting in the mid to late  
9 1990s.

10           It is also an alternate solvent in modified  
11 perchloroethylene dry-cleaning machines in California, but  
12 currently its use in dry-cleaning facilities is quite  
13 limited. I think there might be only one or two  
14 facilities that actually use 1-bromopropane.

15           Okay. Next slide.

16                           --o0o--

17           DR. DODGE: California emissions. We have very  
18 limited data on 1-bromopropane emissions. And I'll be  
19 referring to 1-bromopropane as 1-BP occasionally. It's  
20 currently not reportable under the Hot Spots Program, but  
21 this will -- this should change next year, hopefully,  
22 under the Hot Spots Program. Facilities will need then to  
23 quantify it and quantify its emissions.

24           There was a statewide California survey conducted  
25 by the California Air Resources Board in 2011. And they

1 reported a total of 160.7 tons of 1-BP, or 1-bromopropane,  
2 due to solvent cleaning operations.

3 Next slide.

4 --o0o--

5 DR. DODGE: Metabolism of inhaled 1-bromopropane  
6 in rodents is primarily through oxidative metabolism via  
7 P450 enzymes, conjugation with glutathione, and  
8 debromination. The majority of the absorbed of 1-BP maybe  
9 excreted unchanged or as CO2 in exhaled area within four  
10 hours. This particular study was in IV, or intravenous,  
11 study in rodents. But inhalation, you see the same  
12 numbers as you do with injecting into the IV. The  
13 absorbed 1-BP in exhaled hair is 41 to 71 percent in the  
14 study. And when it's exhaled as CO2, it's about 10 to 31  
15 percent.

16 Radiolabeled 1-BP recovered in urine ranged from  
17 17 to 23 percent. The main metabolite -- urinary  
18 metabolite excreted was n-acetyl-s-propylcysteine. This  
19 consisted of 37 percent of the total urinary metabolites.  
20 This metabolite is found in the urine of 1-BP workers and  
21 it is found in biomonitoring studies of children and  
22 pregnant women. Other metabolites -- minor metabolites  
23 include 1-alpha-bromohydrin in glycidol. Both are known  
24 mutagens.

25 Next slide.

1                   --o0o--

2                   DR. DODGE: NIOSH, which stands for the National  
3 Institute of Occupational Safety and Health, observed a  
4 strong association between the time-weighted average  
5 inhalation exposure of 1-BP in workers and the urinary  
6 metabolite n-acetyl-s-propylcysteine. And one of their  
7 conclusions was that this metabolite is an effective  
8 biomarker for exposure of 1-BP workers.

9                   There were two biomonitoring studies that have  
10 come out recently. The first is the National Children's  
11 Vanguard Study conducted 2009 to 2010. And they found this  
12 metabolite, n-acetyl-s-propylcysteine in 99 percent of  
13 urine samples of third trimester pregnant women. There  
14 are nearly 500 women in this study.

15                   There was also an NHANES study conducted from  
16 2011 to 2012. NHANES stands for the National Health and  
17 Nutrition Examination Survey, which is conducted  
18 occasionally, where mean urinary levels of  
19 n-acetyl-s-propylcysteine was 2.6 and 3.3 in boys and  
20 girls respectively. These particular levels in urine is  
21 similar to what was seen in the third trimester pregnant  
22 women of the Vanguard study.

23                   So these surveys suggest widespread  
24 non-occupational exposure to 1-BP. Although, exposure to  
25 other chemicals may result in the same urinary metabolite,

1 this has not been explored in these biomonitoring studies.  
2 They just suggested that there was exposure to  
3 1-bromopropane, or 1-BP, but it's not clear at this point  
4 what other chemicals they could have been exposed to that  
5 result in the same metabolite.

6 Next slide.

7 --o0o--

8 DR. DODGE: Okay. I'll start with the NTP, or  
9 National Toxicology Program, study here, in which they  
10 performed a whole body inhalation cancer bioassay in rats  
11 and mice, which was concluded and published in 2011. This  
12 is the only long-term or lifetime rodent study available  
13 for 1-bromopropane.

14 In this study, which was two years, they used  
15 their standard species and strain of rats and mice, F344  
16 rats, and B6C3F1 mice. There were 50 animals per exposure  
17 group, per sex, per species. In rats, the exposures were  
18 0, 125, 250, and 500 parts per million for 6.2 hours a  
19 day, or six hours and 10 minutes per day. This was for  
20 five days a week for 105 weeks, or roughly two years.

21 In mice, the exposure duration was the same, six  
22 hours, 10 minutes per day, five days a week, 105 weeks.  
23 However, the high-end exposure was lower. The exposures  
24 were 0, 62.5, 125, and 250 parts per million. They did  
25 not have a 500 parts per million group for mice, because



1 this reached a threshold where you saw severe liver  
2 damage. In fact, if you exposed the mice to 500 parts per  
3 million or greater, many of them may die in the first week  
4 of exposure due to liver damage.

5 Next slide.

6 --o0o--

7 DR. DODGE: Following the two-year exposure in  
8 rats and mice, there was an increased tumor incidence in  
9 male and female rats. We'll talk about the rates here in  
10 this first slide. In male rats, you saw an increase in  
11 epithelial skin tumors or if they were of epithelial  
12 origin. This is included keratoacanthoma, basal cell  
13 adenomas, basal cell carcinoma, and squamous cell  
14 carcinoma.

15 These skin tumors combined resulted in a  
16 statistically significant increase in all exposure groups  
17 compared to the control group. In addition, there was a  
18 positive trend for this tumor type. In other words, as  
19 dose increased, you saw an increase incidence of these  
20 tumors. In female rats, there was an increase in large  
21 intestine adenoma in the high dose group, the 500 part per  
22 million group. In addition, there was a positive trend  
23 for this tumor type.

24 In male rats, the NTP also saw an increase in  
25 large intestine adenoma, but the increase where there was

1 only a few animals in the -- in the exposure groups that  
2 showed this particular tumor. This resulted in no  
3 difference from control and no positive trend for the  
4 tumor type. However, because these tumors are very rare  
5 in rats, the NTP considered it to be caused by  
6 1-bromopropane.

7 Next slide.

8 --o0o--

9 DR. DODGE: In mice, there was increased tumor  
10 incidences in the females only. These were lung tumors,  
11 alveolar/bronchiolar adenoma and carcinoma combined. The  
12 increases were statistically significant in all exposure  
13 groups compared to the control group, and there was a  
14 positive trend for this tumor type.

15 In male mice, there was no increase in tumors  
16 that were suspected to be due to 1-BP exposure.

17 Next slide.

18 --o0o--

19 DR. DODGE: Now, this is the only long-term  
20 cancer study in animals. However, there is other  
21 supporting data. Metabolism of 1-BP produces effects  
22 similar or that other carcinogens are known for, such as  
23 oxidative stress via glutathione depletion and  
24 immunomodulation.

25 There are structurally related brominated

1 hydrocarbon compounds that also cause tumors in the same  
2 organs and tissues as 1-BP. These include  
3 1,2-dibromoethane, tribromomethane,  
4 1,2-dibromo-3-chloropropane, and bromodichloromethane.

5 1-BP metabolites form by cytochrome P450  
6 mediated oxidation are also known to be direct acting  
7 mutagens. And I mentioned these earlier,  
8 alpha-bromohydrin and glycidol.

9 Next slide.

10 --o0o--

11 DR. DODGE: There have been genotoxicity studies  
12 with 1-bromopropane, although it's a relatively small  
13 genotoxicity database compared to some of the other major  
14 compounds that the NTP has examined.

15 Now, I'll go over these briefly. There were  
16 three studies that looked at DNA damage. This was with  
17 the comet assay. However, they were equivocal in their  
18 findings. In other words, it wasn't clear, there was a  
19 positive that the 1-BP was positive for DNA damage by  
20 these comet assays.

21 However, there was two DNA adduct formation  
22 studies, one in vitro and one in vivo, and these were both  
23 positive. And we're talking about N7-guanine adducts  
24 here. There was one study that looked at induction of DNA  
25 repair, and this was negative.

1           There are three good bacterial mutation assays  
2 available. Two were negative, however, one was positive.  
3 And the one that was positive did the best job in  
4 preventing evaporation of 1-BP during incubation of 1-BP  
5 with bacteria.

6           There's one study that looked at mammalian cell  
7 gene mutation. And this was with mouse lymphoma cells,  
8 and this was positive.

9           There were two studies that looked at chromosomal  
10 damage in vivo, and these were both negative, as well as  
11 the transgenic rodent mutation assay also negative.

12           Next slide.

13                           --o0o--

14           DR. DODGE: So to recap, there are no  
15 epidemiology findings for carcinogenicity, although  
16 exposure data of sufficient size and duration may not  
17 exist yet, and this is because use of 1-bromopropane  
18 didn't increase dramatically until around the mid to late  
19 1990s, at least occupational use.

20           One rodent lifetime inhalation study found that  
21 1-BP is carcinogenic in multiple species and induced  
22 tumors in one or more sites in rats. There are some  
23 positive genotoxicity studies. DN adduct formation in  
24 both in vivo and in vivo -- in vitro and in vivo.  
25 Mutagenic in a closed system bacterial Ames assay, and it

1 induced mutations in vitro in mouse lymphoma cells.

2           There are -- there are also structurally related  
3 brominated compounds that produce similar tumors in  
4 lifetime rodent studies.

5           Combined, these factors point to a potential for  
6 1-BP to induce tumors in humans.

7           Next slide.

8                               --o0o--

9           DR. DODGE: So now we'll talk about the  
10 inhalation unit risk factor derivation. The first step in  
11 IUR, or inhalation unit risk factor derivation, is  
12 converting the NTP tumor incidence into what's called an  
13 effective tumor incidence. The effective tumor incidence  
14 is the number of tumor-bearing animals over the number of  
15 animals alive at time of first occurrence of the tumor.  
16 This removes animals from the assessment that die before  
17 they were considered at risk for tumor development.

18           Next slide.

19                               --o0o--

20           DR. DODGE: In this slide, we compare the NTP  
21 tumor incidence for effective -- the NTP tumor incidence  
22 with the effective tumor incidence. The middle column  
23 labeled "NTP Incidence", you'll notice that in the  
24 denominator, there are 50 animals.

25           Now, in the column to the farthest right, the

1 "Effective Tumor Incidence", the one in bold, you'll  
2 notice that the denominator is lower, sometimes slightly  
3 lower, sometimes a little more lower. And this is because  
4 again animals were removed from the assessment that died  
5 before they were considered at risk for tumor development.

6 Next slide.

7 --o0o--

8 DR. DODGE: In male rats, survival was  
9 significantly reduced at 500 parts per million. The life  
10 table pairwise comparison P value was 0.033. There was  
11 also decreased survival greater than 15 percent compared  
12 to controls by week 85 of the study. And most of these  
13 early deaths were due to treatment-related chronic  
14 inflammation. Now, in a situation like this, we didn't  
15 use -- we couldn't use the normal modeling that we'd use,  
16 so we'll discuss this in a few slides.

17 Next slide.

18 --o0o--

19 DR. DODGE: To determine cancer potency, we also  
20 need to convert the 1-BP air concentration to an average  
21 daily dose, expressed as milligrams per kilogram body  
22 weight per day. The dose is -- the equation is shown  
23 here. The dose is equal to the inhalation rate, or IR,  
24 times C, the concentration, divided into the body weight,  
25 where C, the concentration, is time adjusted to an annual

1 average. The exposures were 6.2 hours per day, and this  
2 is divided into 24 hours, and they were five days a week,  
3 this is divided into seven days. Hence, we get an annual  
4 average.

5 Body weight is average over the two years of  
6 exposure in the NTP study. Body weights were measured  
7 once per week in the first year of the study and then for  
8 most of the second year of the exposure, they were  
9 measured every four weeks.

10 The inhalation rate is an equation based on the  
11 body weight of the animals. And this is at the bottom of  
12 the slide for rats. It is -- this regression analysis  
13 equation was developed by OEHHA in 2018 based on  
14 up-to-date data on body weight and inhalation rate in  
15 rats.

16 In mice, we used the linear regression equation  
17 by Anderson and this was published in 1983. So you just  
18 simply plug in the body weight into this equation and you  
19 get the inhalation rate.

20 Next slide.

21 --o0o--

22 DR. DODGE: So these are our doses expressed as  
23 milligrams per kilogram body weight per day in rats and  
24 mice.

25 Next slide.

1                   --o0o--

2           DR. DODGE: We now have the fraction affected,  
3 which is the effective tumor incidence and the dose,  
4 expressed in milligrams per kilogram body weight per day.  
5 We can now run a multi-stage cancer model in the Benchmark  
6 Dose Software by U.S. EPA. And this was used to determine  
7 the cancer potency for female rat and female mouse tumor  
8 data.

9           Now, as I mentioned earlier, there was a decrease  
10 survival of male rats. I'm sorry, I probably mentioned --  
11 I should say that it was female rats and female mice. I  
12 may have not said that right in the first bullet there.

13           Now, for decreased survival in male rats, we used  
14 the multi-stage Weibull model. And this is a  
15 time-to-tumor model to account for intercurrent mortality.  
16 It takes into account the day of death into the model.  
17 Potency values were derived using a benchmark dose of five  
18 percent with five percent extra risk to calculate the  
19 benchmark dose.

20           The 95 percent lower confidence bound on the  
21 effective dose producing a five percent response is called  
22 the BMDL05 and is used to calculate cancer potency. So  
23 the cancer slope factor is 0.05 divided into the BMDL05.

24           Next slide.

25                   --o0o--



1 DR. DODGE: Cancer slope factors were calculated  
2 for tumors with a statistically significant tumor  
3 incidence on pairwise comparison to controls and a  
4 positive trend for dose response.

5 These included skin tumors of epithelial origin  
6 in male rats, large intestine adenomas in female rats, and  
7 the lung tumors in female mice. Again, we did not develop  
8 a cancer slope factor in male mice, because 1-BP did not  
9 result in increased tumors in male mice.

10 Next slide.

11 --o0o--

12 DR. DODGE: So we have a cancer slope factor  
13 based on the animal or rodent we now have to extrapolate  
14 to human. And this is done with the equation in the  
15 middle of the slide and is based on body-weight scaling to  
16 the three-fourth's power.

17 So in this equation, we have the cancer slope  
18 factor for human is equal to the cancer slope factor in  
19 the animal, times the body weight of the human, divided  
20 into the body weight of the animal, to the one-fourth  
21 power. This interspecies scaling factor accounts for  
22 pharmacokinetic differences, as well as pharmacodynamic  
23 considerations.

24 Next slide.

25 --o0o--

1 DR. DODGE: So here is a table of the results  
2 from the benchmark dose analysis. The first five columns,  
3 the AIC, or Akaike information criterion, the P value, the  
4 BMD, BMDL05, and the rodent cancer slope factor, those are  
5 all generated by the U.S. EPA -- the U.S. EPA modeling --  
6 bench dose modeling.

7 The last column on the far right is the cancer  
8 slope factor for human, expressed as milligrams per  
9 kilogram per day to the minus one. This was calculated  
10 using the equation in the previous slide. Now, the  
11 numbers in this column are in bold. For male rat skin  
12 tumors combined, we've got a cancer slope factor of  
13 0.0053. In female rats for large intestine tumors, it was  
14 a smaller cancer slope factor of 0.0017.

15 However, in female mice, the lung tumors  
16 generated the highest cancer slope factor of 0.013. Lung  
17 tumors in female mice provided the highest cancer slope  
18 factor value, establishing this tumor as the most  
19 sensitive endpoint, or 1-BP-induced carcinogenicity.

20 Next slide.

21 --o0o--

22 DR. DODGE: This is the Benchmark Dose Multistage  
23 Cancer Model plot fit to the alveolar/bronchiolar lung  
24 tumors in female mice exposed to 1-BP. In this graph, the  
25 X axis on the bottom is dose. The Y axis on the left side

1 is response or the effective tumor incidence.

2 As you can see there is a positive trend for this  
3 tumor type. As you go from left to right, the dose  
4 response increases. As dose increases, the incidence of  
5 this tumor increases.

6 In the lower left, we have a orange line --  
7 vertical orange line and that points to the BMD for five  
8 percent response rate on the X axis or dose, and the blue  
9 line to the left -- the vertical blue line to the left,  
10 that is your BMDL05 for the 95 percent lower confidence  
11 bound.

12 Next slide.

13 --o0o--

14 DR. DODGE: Now, we've been talking about cancer  
15 slope factors. However, this document is called an  
16 inhalation unit risk for 1-bromopropane. So here we get  
17 to development or Calculation of the inhalation unit risk  
18 factor. The inhalation unit risk is equal to the cancer  
19 slope factor, times the breathing rate, divided into body  
20 weight, times a conversion factor. So the cancer slope  
21 factor we are using is 0.013 milligrams per kilogram body  
22 weight per day to the minus one based on the tumors found  
23 in female mice. The human breathing rate used in this  
24 equation is default of 20 cubic meters per day in humans.  
25 The average human body weight used was 70 kilograms.

1           The milligram to microgram conversion factor was  
2 1,000. This resulted in a inhalation unit risk of 3.7  
3 times ten to the minus six. And this is in units of  
4 micrograms per cubic meter to the minus one.

5           So what this number means is if there is lifetime  
6 exposure to one microgram per cubic meter of 1-BP, this  
7 will result in an extra cancer risk of 3.7 chances in a  
8 million.

9           Next slide.

10                   --o0o--

11           DR. DODGE: During the public comment period, we  
12 had no public comments submitted. However, since the  
13 public comment period, we did make a few changes to the  
14 document. U.S. EPA came out with a TSCA reference on  
15 1-bromopropane, in which they had some good comments and  
16 analysis in their report. So we included some of that in  
17 our document as well. Specifically, these are comments on  
18 n-acetyl-s-propylcysteine as a biomarker on page 15. And  
19 the -- some of the advantages and limitations of several  
20 of the 1-BP genotoxicity studies, this was on page 19.

21           In addition, added a few -- added a few sentences  
22 regarding N7-guanine adducts on page 17 of the  
23 genotoxicity section. And we added a summary of the  
24 BioReliance bacterial mutation study, or assay, on page  
25 18, and removed the Elf Atochem study, which was a

1 bacterial mutation assay. The reason we removed the Elf  
2 Atochem study is we could not obtain the full report. All  
3 we had was a brief summary of their results. So I could  
4 not describe or assess their methodology and their  
5 results.

6 Next slide.

7 --o0o--

8 DR. DODGE: Well, that concludes my presentation  
9 and we can open it up to questions now.

10 CHAIRPERSON ANASTASIO: Great. Thank you very  
11 much, Daryn. We appreciate your presentation and your  
12 work on this carcinogen. So the leads for 1-bromopropane  
13 were Ahmad and Karen. So, Ahmad, can you get us started  
14 off?

15 PANEL MEMBER BESARATINIA: Sure. Thank you,  
16 Cort. Well, this is a very well written report. It's  
17 organized nicely and it's easy to follow. Data  
18 presentation is clear and discussion of the results and  
19 conclusions are fine, except for a few instances that may  
20 require some additional information or clarification.

21 There are also a few other areas in the document  
22 that could use some revisions. I start with the more  
23 general comment. Firstly, the up-to-dateness of this  
24 report. The time frame of coverage for this report could  
25 be spelled out preferably if the pain document.

1 I notice somewhere in preface, I think it was  
2 page four, it stated that the literature summarized and  
3 referenced in this document covers the relevant published  
4 report for 1-BP through spring 2021. Well, looking at the  
5 bibliographic list, I see very few recent publication. As  
6 a matter of fact, the most recent journal articles cited  
7 in this report are only a couple of studies from 2018 and  
8 2019, nothing from 2020 or 2021.

9 I did a quick PubMed search and came across  
10 several pertinent studies published in 2020, as well as in  
11 early 2021. They cover various topics related to this  
12 report, including how 1-BP can cause oxidative stress  
13 induce apoptosis, and this regulates signaling pathways  
14 that are important in carcinogenesis.

15 Also there are newer much more comprehensive  
16 biomonitoring studies on 1-BP, both in occupationally or  
17 environmentally exposed individual, as well as in  
18 experimental mice. Inclusion of these studies would make  
19 the report more comprehensive and up to date.

20 Along these lines, what you may want to consider  
21 is to create a brief section, something like a paragraph,  
22 in the main body of document, not in the preface, to  
23 specify the search strategy used for this report. This  
24 could describe the time frame of the coverage, the search  
25 engine we use, for example, PubMed, MEDLINE, governmental

1 agency database, and so on, inclusion/exclusion criteria,  
2 search terms, and so on.

3           The other thing is that some of the -- there are  
4 some non-peer reviewed references. You mentioned one of  
5 them at the end of your slides, I guess. But there are  
6 other non-peer reviewed references that are cited and  
7 discussed in this report. I bring it up, because you  
8 state the literature summarized and referenced in this  
9 document covers the relevant published report for 1-BP.  
10 Well, technically those reports are not published, because  
11 they haven't undergone peer review. Although, there's a  
12 mention that a panel has evaluated a couple of these  
13 unpublished report. Again, inclusion of a search strategy  
14 section can be helpful, because it allows you to address  
15 issues like this and specify your inclusion and exclusion  
16 criteria.

17           PANEL MEMBER BLANC: Can I interrupt for a  
18 second. Could whoever is doing the technical, take down  
19 the slides, so that everybody sees your -- sees the  
20 speakers. We don't need to see the slide that says  
21 questions.

22           Thank you.

23           PANEL MEMBER BESARATINIA: Are we good to go?

24           Okay. Regarding the content, page two, I think  
25 it's line 93, it reads that in 1-BP treated males, the low

1 incidence of these tumors resulted in no significant  
2 difference relative to controls. And no significant  
3 positive trend was found.

4           And then two lines down -- I'm sorry, four lines  
5 down, it says the NTP concluded that the presence of these  
6 tumors in exposed females and the low historical incidence  
7 in controls indicated the tumors in males were exposure  
8 related. Well, these two sentences do not agree with one  
9 another. On the one hand, you're saying that the tumor  
10 incidence in the treated males is not different from that  
11 in control. And on the other hand, you're concluding that  
12 the tumors detected in the males are due to exposure to  
13 1-BP.

14           Well, it's unclear to me if you are rephrasing  
15 the statement by the NTP or you're coding the original  
16 statement in the NTP report. Either way, the two  
17 sentences statements are not consistent with one another.

18           Also, on the same page, it reads -- I think this  
19 is also something you mentioned in your slides, that skin  
20 tumors of epithelial origins were increased in exposed  
21 male rats, and you cite Table 1, which is on page five.

22           Next page, on page three, top paragraph reads,  
23 "When combining all neoplasms of epithelial origin, the  
24 tumor incidence of keratoacanthoma... -- I can't spell  
25 this -- "...keratoacanthoma, basal cell adenoma, basal



1 cell carcinoma, or squamous cell carcinoma in males was  
2 significantly increased in all exposed groups and a  
3 positive trend was observed (Table 1)". And then, "The  
4 incidence of all epithelial tumors combined in all exposed  
5 group exceeded the historical control range for inhalation  
6 study. The NTP concluded that the increased incidence of  
7 all tumors of epithelial origin were a result of BP  
8 exposure".

9 Well, looking at Table 5 -- Table 1 in page five,  
10 there is no increase in the incidence of three out of the  
11 four tumor types of epithelial origin in the treated  
12 animal versus control. This include no increase in the  
13 incidence of basal cell carcinoma, squamous cell  
14 carcinoma, or basal cell adenoma in males treated with  
15 1-BP versus control nor is there any trend in these  
16 animal. Just take a look at the P values there.

17 Only increases in the incidence of  
18 keratoacanthoma in two out of the three treatment groups  
19 that is 125 and 500 parts per million 1-BP are  
20 statistically significant. So the data in Table 1 do not  
21 really support the conclusion as it's phrased or written  
22 in page three.

23 What is also not clear is the rationale for  
24 pulling together the tumor incidence data for four  
25 different tumor types benign and malignant, and using the

1 combined values to reach this conclusion. This becomes  
2 more of the concern when on page 26, I think it's line  
3 758. It reads that, The tumor -- The tumors OEHHA  
4 identified as being suitable for cancer potency  
5 determinations were adenomas of the large intestine in  
6 female rats the combined skin tumors of epithelial or  
7 origin male rats, including keratoacanthoma, basal cell  
8 adenomas or carcinoma, squamous cell papilloma or  
9 carcinoma, and so on.

10 Well, first of all, keratoacanthoma is benign  
11 lesion which rarely ever progresses to a squamous cell  
12 Carcinoma. As a matter of fact, only less than six percent  
13 of keratoacanthoma become cancerous and progress to a  
14 malignant form. So I'm not sure about the justification  
15 for lumping together a benign lesion with rare potential  
16 to become cancerous with other malignant and non-malignant  
17 lesions in order to make a cancer potency determination.

18 I think I'm going to stop here. But all in all,  
19 I think most of these can be addressed by rewriting and  
20 revising the text, and rephrasing some of the statements  
21 that are made.

22 Thank you.

23 CHAIRPERSON ANASTASIO: Thank you, Ahmad.

24 Daryn, did you want to address any of Ahmad's  
25 comments now?

1 DR. DODGE: Yeah. Well, usually our  
2 derivation -- of to get to cancer slope factors, you know,  
3 tumors that are similar are combined and that's just a  
4 part of the process. And it's -- I guess, it's kind of a  
5 conservative way to look at developing a cancer risk  
6 factor or potency factor, but this is how we decided to do  
7 it in our -- in our branch here, OEHHA -- for OEHHA, our  
8 Cancer Unit Branch.

9 DR. BUDROE: I'll also note, I don't have the NTP  
10 document in front of me, but it may well have been that  
11 NTP considered all those skin tumor types to be related  
12 and to progress -- have the potential to progress through  
13 malignancy. And so they would have had essentially a  
14 bundled incidence in the NTP report. But we'll go back  
15 and check on that and see if we need to rephrase what was  
16 said about those rat skin tumors or not.

17 PANEL MEMBER BLANC: My interpretation of the  
18 comment of the lead would be that you could address this  
19 simply by a sentence that said that this kind of grouping  
20 is consistent with previous precedent and policy, just so  
21 that you acknowledge it. I don't -- I didn't hear of a  
22 critique as being that you should therefore not consider  
23 the bundled epithelial benign and malignant incidence, but  
24 simply that you need to put that statement in there just  
25 to make clear that this has been our established policy.

1 PANEL MEMBER BESARATINIA: Yeah. If this is a  
2 common practice and conventionally it's being done like  
3 this, that's fine, but probably a clarification, as Paul  
4 mentioned, statement would take care of that.

5 DR. BUDROE: Okay. We'll go ahead and do that.

6 CHAIRPERSON ANASTASIO: Great. Thank you, John.  
7 Thank you Daryn.

8 Daryn, anything else related to Ahmad's comments?

9 DR. DODGE: Yeah. If Ahmad could send us the  
10 studies he found, we could look at them and consider  
11 summarizing them in the report. You know, the more recent  
12 ones that he found from the late 2020-2021.

13 PANEL MEMBER BESARATINIA: Sure. I can do it and  
14 I think you can also follow up on it. I have a select  
15 number, probably six, seven papers, but there are more.  
16 You can simply go through PubMed. But I will send it --  
17 how do I do that, Cort? Shall I send it to you or John  
18 or --

19 CHAIRPERSON ANASTASIO: No. Go ahead and send it  
20 directly to John.

21 PANEL MEMBER BESARATINIA: Okay. I'll do so.

22 CHAIRPERSON ANASTASIO: Yeah. Thank you, Ahmad.

23 DR. BUDROE: And we'll also take a second PubMed  
24 look.

25 PANEL MEMBER BESARATINIA: Yes. Thank you.

1 CHAIRPERSON ANASTASIO: Okay. Great. Thank you  
2 very much, Ahmad, for your comments.

3 I move now to the second lead, Karen.

4 PANEL MEMBER MESSER: Okay. Well, thank you,  
5 Ahmad. And I want to follow up by congratulating Dr.  
6 Dodge on a very well written report. I also found it well  
7 laid out. The accumulation of evidence seems clear to me.  
8 It was well documented. It was easy to understand. So I  
9 thought it was a high-quality report and I appreciate how  
10 easy it was to follow.

11 My comments, I'll start with an overall comment  
12 related to Dr. Besaratinia's latest comment, which is I  
13 think it's a strength of what's done here in the two  
14 reports that I've seen, that these reports generally  
15 follow well-documented policies. And wherever you can  
16 point that out, I think it's a strength and it helps to  
17 strengthen the weight of the evidence.

18 For example, this is a great example where you're  
19 combining epithelial tumors. When I read that, I thought,  
20 oh, that does seem reasonable. You know, adenomas  
21 progress to carcinomas. I take the point that Ahmad rose  
22 of these keratoacanthomas. I Googled them, because I  
23 wasn't familiar with it and they do seem to be rare in  
24 humans. I accepted that maybe they're less rare in  
25 rodents and maybe there's some evidence linking them to

1 cancer. But I think the fact that this is a policy  
2 decision undertaken before the report is written really  
3 strengthens the evidence base, because that, of course,  
4 means that you're not changing your analysis plan as you  
5 go through the report, that you have a procedure that's  
6 documented that you're following and you're letting the  
7 chips fall where they may as your analysis follows this  
8 procedure. So that's just a general comment. Wherever  
9 you are following a procedure, it's great to call that out  
10 and document it to whatever policy documents you have.

11 My -- the things that I might contribute to this  
12 discussion are also clarifications in methodology, and  
13 they're statistical, because that's my particular  
14 expertise. Generally, I found the statistics to be  
15 appropriate and well explained, understandable. I just  
16 had two areas where there might be questions on review, if  
17 this were a paper that were being reviewed in the  
18 scientific literature.

19 I thought the use of Cochran-Armitage trends in  
20 Tables 1 and 2 was a strength. So I think that is a good  
21 addition. Evidently, the underlying publication from 2011  
22 produced these data and did these pairwise comparisons of  
23 each dose group to control, which is appropriate. But  
24 it's much more powerful to do a test for trend, a test --  
25 dose response test, which is appropriately carried out

1 using this Cochran-Armitage trend test. So I think that's  
2 a strength and an appropriate addition.

3 I just want to make one technical comment, which  
4 is the pairwise comparisons are done using a small sample  
5 approach, Fisher's exact test, which is conservative. It  
6 gives P values that are too large, but you know that the  
7 type one error is appropriate. The Cochran-Armitage trend  
8 test is a large sample test, so it relies on asymptotics  
9 for its P values. However, it's robust. So I just wanted  
10 to add that to the comments that you might make or your  
11 policy documents that you might cite that this test is  
12 known to be -- you know, sample sizes are not that small.  
13 You've got on the order of 40 or 50 animals in the  
14 denominator across three different doses, but the numbers  
15 of tumors are small, so the probabilities are small.

16 So you're near the boundary of where asymptotics  
17 are well established. However, this Cochran-Armitage test  
18 is appropriate in this case, particularly if you're using  
19 equally spaced weights in the test. So pardon me for  
20 getting rather technical here. The weights were not  
21 described. So I think it would -- it would help you to  
22 say what the weights in the test were. Are using the dose  
23 levels or are you using an ordinal weight, zero, one, two,  
24 three? If robustness is a question, then it is more  
25 robust to use ordinal weights, zero, one, two, three.

1           In any case, these P values are very small. So I  
2 don't think it's an issue in this report. I can just  
3 imagine borderline cases where it might be more of an  
4 issue. And I could give you a citation to the big text  
5 book for discrete data analysis that would support these  
6 comments. I'm happy to do that.

7           The other technical comment is again more of a  
8 policy issue. This is a little bit more general, so maybe  
9 a little bit more of interest to other reviewers. You  
10 know, when looking at these tables, many, many comparisons  
11 are being made. And so there is the issue of multiple  
12 comparisons that comes to the front. And I think -- and  
13 it would -- again, I don't think anything inappropriate  
14 has been done here. I think there's a weight of evidence  
15 that's appropriately summarized. But I think the multiple  
16 comparisons issue, it would strength these reports, if the  
17 multiple comparisons issue was acknowledged and addressed  
18 with some policies.

19           What I might recommend, for example, for Table  
20 1 -- should I share my screen to make it easier to follow?  
21 Would that be appropriate or...

22           CHAIRPERSON ANASTASIO: Sure, that's fine.

23           PANEL MEMBER MESSER: Okay. And I'll try not to  
24 go on too long here. So here's Table 1. I hope you can  
25 all see it. The issue is that we've got all these



1 comparisons within skin, right. We've got one, two,  
2 three, four, five different lines within skin. And within  
3 each line, we've got one, two, three comparisons against  
4 control, and then a trend test against control. So we've  
5 got quite a number of comparisons being made. And, of  
6 course, the family-wise type one error accumulates in this  
7 case. So that should be addressed.

8 I would suggest having some kind of multiple  
9 comparisons procedure within a group like this. I think  
10 combining them and then doing a trend test is a principled  
11 and power -- likely powerful way, an appropriate way to  
12 address the accumulated evidence.

13 So you might -- you might just think about this  
14 issue and maybe prioritize one test within a group like  
15 this as your primary standard-bearer. It seems there's an  
16 informal way of weighting the evidence to say that there  
17 was a statistically significant result across all exposure  
18 groups. I don't find that inappropriate. I just might  
19 think it through and formalize it a little bit more. So  
20 generally, what you can do is you can institute a formal  
21 multiple comparisons procedure on a hierarchy or a few  
22 tests and then have a policy for looking for a weight of  
23 evidence across uncontrolled multiple comparisons.

24 And again, the suggestion is just to acknowledge  
25 the issue and think about some appropriate policies. It's

1 not a suggestion that there's any real underlying weakness  
2 here, because I think it seems that the weight of the  
3 evidence has been what's driving these conclusions and it  
4 seems appropriate to me. So it's just a general  
5 recommendation to consider the multiple comparisons issue  
6 and write some policies down.

7 My only other comment -- I have some minor  
8 comments. Let me find my notes. This is my ignorance.  
9 Please excuse me. The computation of your constant C,  
10 capital C, and I didn't note the page, but this is where  
11 you're going from like 6.2 hours up to annual exposure. I  
12 didn't quite follow it. That's just algebra, but I didn't  
13 quite follow it. I got left at a weekly exposure not an  
14 annual exposure. So if you could just please double check  
15 what you wrote and make sure it's correct there.

16 If you could please clarify that the lower  
17 confidence limit from your EPA models -- I had to think  
18 about this. On Figure 2, thank you for that figure. It's  
19 very clear. It helped me understand what's going on. And  
20 thank you for pointing out on page 33 the sentence where  
21 you say linear extrapolation from the BMDL to the origin  
22 was used to determine the slope. That was very clear.  
23 That helped me understand how you're using the model. The  
24 only thing I would have liked was to understand that the  
25 BMDL itself came out of the software.

1           So I understood that the -- you know, the BMD  
2 came out of the software. I would have liked to have had  
3 a note that the BMDL came straight out of the software. I  
4 was trying to figure out where that came from.

5           And then let me just go back. Yeah, those were  
6 really my comments. The only other thing is -- yeah, on  
7 the Cochran-Armitage test, please indicate the software  
8 used and especially the choice of weights or scores for  
9 the categories. So I can send you these technical  
10 comments in a written form to make them easier to follow.

11           Thank you.

12           CHAIRPERSON ANASTASIO: Thank, Karen. Yeah, I  
13 think that would be very helpful to send the technical  
14 comments in a written form.

15           Also, are you available for statistical  
16 consulting --

17           PANEL MEMBER MESSER: Sure.

18           CHAIRPERSON ANASTASIO: -- for comparison issues  
19 should OEHHA have questions?

20           PANEL MEMBER MESSER: Absolutely. No problem.

21           CHAIRPERSON ANASTASIO: That would be great.

22 Okay. Thank you very much.

23           Well, great. Thank you very much, Ahmad and  
24 Karen. I'd like to now open it up to the Panel at large.

25           Yes, Paul, go ahead.

1           PANEL MEMBER BLANC: Okay. I'll try to figure  
2 out how to take my hand down too. My first question is in  
3 regard to your comment on using survival time or time till  
4 tumor incidence, which you only invoked for the study  
5 where there was high mortality at the highest dose level.  
6 But when you showed the data on the tumor incidence per  
7 surviving animal, I noted that the -- there was no loss of  
8 survival in the analysis of the lung tumor incidence in  
9 female mice, which ultimately was the endpoint you used to  
10 derive the cancer potency factor. My interpretation of  
11 that, because it was so different from the others, was  
12 that, in fact, the tumor in -- the tumors was -- were  
13 happening early enough that the mice weren't dying from  
14 another factor.

15           And if that's correct, wouldn't it make -- would  
16 it be more powerful to use time until lung tumor incidence  
17 as your endpoints, since they seem to be developing the  
18 tumors earlier relative to other things that are  
19 happening? In other words, most of these skin cancers are  
20 being detected when the animals are sacrificed, but a lot  
21 of the animals have died for other reasons, that's why the  
22 N is smaller. But maybe I'm misinterpreting the  
23 implications of those data. So I think it would -- for  
24 me, it would be better to have them answer the  
25 questions as I bring them up.

1 CHAIRPERSON ANASTASIO: Yeah. I think that's  
2 good.

3 Daryn.

4 DR. DODGE: Thank you, Dr. Blanc. Yeah. Well,  
5 we'll discuss this with our statisticians in-house here  
6 about this. Basically, it didn't quite meet the criteria  
7 to use a Weibull time-to-tumor model. So that's what I  
8 can say generally. So we just used the general  
9 multi-stage model.

10 PANEL MEMBER BLANC: I mean, I'd be curious what  
11 Karen might have to say about it, whether I'm overreaching  
12 in terms of what those data implicate.

13 PANEL MEMBER MESSER: Well, I think that's an  
14 interesting observation that didn't come to my mind, that  
15 the lung tumors must be occurring earlier. And certainly  
16 a time-to-tumor model has more power. But I -- again, I  
17 think that the general comment is that if there's an  
18 established policy to address this issues to say when you  
19 switch from one model to the other, that's a real  
20 strength, and that policy should be followed.

21 PANEL MEMBER BLANC: And sometimes we have  
22 presented the results of the alternative method just to  
23 show that it doesn't really substantively change the  
24 results and that can be very useful, too, Daryn.

25 PANEL MEMBER MESSER: As a -- as a sensitivity

1 analysis.

2 PANEL MEMBER BLANC: Yes. A kind of sensitivity  
3 analysis.

4 PANEL MEMBER MESSER: And again, I would just  
5 urge that there be a policy for when that's appropriate,  
6 with it's not, so no one can be accused of cherry picking.

7 PANEL MEMBER BLANC: And then my other comments  
8 are sort of entirely different nature. The date -- the  
9 mutagenesis data suggested that, in fact, this is a --  
10 this may very well be a chemical which acts without  
11 requiring metabolism. And for that reason, it was  
12 somewhat distracting to have so much about the metabolite  
13 that can be used as a biomarker. I guess -- and  
14 especially, if what it was meant to do was show you can  
15 widely detect this biomarker, but we actually don't know  
16 if it's a specific biomarker to this parent compound.

17 So I wouldn't change your -- it doesn't affect  
18 your cancer potency piece of the document. But I  
19 certainly would have appreciated a little bit more -- it  
20 was like an aside in that section, you know, that maybe  
21 this doesn't require metabolism at all. It's a direct  
22 acting carcinogen. And that certainly has implications.  
23 And to me, it would have some implications also for a  
24 chemical, which is largely excreted unchanged throughout  
25 exhalation, which means that the lung is being exposed

1 coming and going, which, of course, would make the choice  
2 of the lung tumors all the more rational. So there were  
3 some implications to that that weren't discussed.

4           And also, I thought what got lost was the fact  
5 that this chemical is debrominated. You kind of alluded  
6 to it in your discussion where you said that, you know,  
7 this brominated by-product is a -- is a known carcinogen.  
8 But all of that, that figure of the metabolism, you know,  
9 I looked at it and I said, well, where did the bromine go  
10 and what is the implication of having a de-brominated  
11 piece of this circulating of the body? Is it bromine  
12 itself? Has it been oxidized to something, other bromine?  
13 Is it -- you know, I just wanted to know, because  
14 bromine -- well, first of all, I was kind of surprised  
15 nobody looked at bromine as a biomarker. If it's being  
16 debrominated, you should be able to just measure bromine,  
17 which is not normally present in anything other than trace  
18 amounts in the human body.

19           So those -- this is not going to change your  
20 document in terms of your, you know, delivering the goods  
21 on a cancer potency factor. But it certainly would be  
22 clearer. I also think there was a point where you left  
23 animals and went to some human data and it was missing  
24 some kind of section marker that said human. All of a  
25 sudden, I was seeing children and adults. It was like

1 children and adult rats. What is this? So that's just  
2 put in a -- you know put in a section there.

3 Those are my comments. And of all of them, I  
4 think my question about the time until tumor is probably  
5 the most substantive, because that would affect your  
6 cancer potency calculation.

7 CHAIRPERSON ANASTASIO: Okay. So Daryn, I know  
8 you addressed the time-to-tumor approach. Anything else  
9 you want to say about that?

10 DR. DODGE: Yeah. Thank you, Cort.

11 Yeah. We will discuss our policy and why we  
12 chose one model over another regarding the female mice  
13 there. Regarding the bromine, bromine is released during  
14 metabolism. And it does circulate in the body. It did --  
15 what -- my impression from reading the metabolism studies  
16 of 1-bromopropane is that workers have to be exposed to  
17 relatively high levels of 1-bromopropane in order to  
18 measure -- to reliably measure an increase in bromine that  
19 was due to exposure to 1-bromopropane. So it wasn't as  
20 good a biomarker as the -- n-acetyl-s-propylcysteine in  
21 urine.

22 PANEL MEMBER BLANC: I think you can say that in  
23 one sentence. And you could also say in one sentence that  
24 bromine is not considered in and of itself a carcinogen,  
25 if that is truly the case, because those are questions



1 which obviously arise. And what you don't say, it just  
2 leaves the -- it just leaves it as a kind of open  
3 question.

4 DR. DODGE: Okay. Thank you, Dr. Blanc.

5 Yeah, I'll emphasize that. We did cover some of  
6 the studies that looked at bromine levels in urine in  
7 these workers, but I -- I'll emphasize that overall it was  
8 thought, at least for non-occupational exposure, it may  
9 not be a good marker, because it's hard to detect levels  
10 above what's normally in the bromine levels in urine.

11 DR. BUDROE: One thing I'd also like to note, as  
12 far as some of the discussion about policies, methodology  
13 policies, early in the document, we usually refer to the  
14 cancer potency technical support document. And that's a  
15 document that the Panel has approved and it contains  
16 essentially a description of most of the methodologies  
17 that we use in generating cancer inhalation unit risks.  
18 So, I mean, we don't go into detail quoting from the  
19 methodology document, you know, for the sake of parsimony.

20 But it's -- you know, we do have a published  
21 methodology that you can refer to.

22 PANEL MEMBER MESSER: I might suggest citing it  
23 more frequently, whenever there's one of these issues.  
24 Just feel free to cite it.

25 DR. BUDROE: Okay.

1 CHAIRPERSON ANASTASIO: All right. Thank you,  
2 John.

3 Let's move on to Joe.

4 Joe, you're muted.

5 PANEL MEMBER LANDOLPH: There. Thank you.

6 Yeah. I appreciated reading the document. I  
7 agree with Karen and Ahmad. It was written, in general,  
8 very well, very clear. And it looked like they had a  
9 literature -- good literature search on the earlier years.  
10 I agree with Ahmad's comment that it's very important to  
11 do the latest years you can get. I think the genetox  
12 database is somewhat thin for this compound. And the  
13 metabolism clearly indicates it looks like it's going  
14 partly by P450, partly by glutathione conjugation and  
15 breakdown of imines and other reactive metabolites. So  
16 clearly more work needs to be done on this compound to  
17 make it a really solid study. And that's not OEHHA's  
18 fault or SRP's fault, just we need more data on it.

19 So I would say I looked at this as a regular old  
20 review and I wrote a review. I'll send up a few  
21 comments -- small comments on the English and a few on the  
22 genetox database to help you out. And I appreciate all  
23 your efforts, and energy, and expertise that's went into  
24 this. And I'll try and help you strengthen it just a tiny  
25 bit more.

1 Thank you.

2 CHAIRPERSON ANASTASIO: Great. Thank you, Joe.  
3 Mike.

4 PANEL MEMBER KLEINMAN: I just have a few  
5 additional comments. One of them may be the way these  
6 documents are structured. But it seems to me that the  
7 preface, which is, you know, in the Roman numeral pages  
8 from the intro, is where you give a lot of introductory  
9 material about the compound, how it's used, the background  
10 for the Hot Spots Program, et cetera. And I'm wondering  
11 if that couldn't be relabeled as introduction and moved  
12 into the main body of the report, because I think people  
13 tend not to look at those preface pages as being part of  
14 the information being presented. And, you know, that's  
15 where you also talk about how this material is used and  
16 the various kinds of applications. So there are a lot of  
17 consumer product uses and things like that. So there is,  
18 you know, a potential for exposure.

19 The information in Table 1, which is, I guess,  
20 directly out of the NTP report, later you actually take  
21 these data and convert them in your Table 5 or 5A using  
22 the adjusted tumor incidences. And I'm wondering whether  
23 that should be, you know, mentioned in the discussion of  
24 Table 1 that you actually use that, because the adjusted  
25 tumor incidences actually gives you, you know, stronger

1 trends and somewhat different P values for the doses. And  
2 I think the adjusted tumor incidences are probably more  
3 relevant for -- yeah, for your analysis.

4           The other thing that I thought was -- it might be  
5 useful, at least from the toxicology standpoint is adding  
6 the bromine stripping, you know, at least in the flowchart  
7 of metabolism in Figure 1. We know that the bromine is  
8 coming out. It's probably coming out as radicals or as  
9 possibly HBR. And there is some indication in the  
10 literature that the bromopropane leads to irritation and  
11 possibly inflammatory changes in the respiratory tract,  
12 which are not germane, given the cancer potency, but might  
13 be useful for people to know that it is an irritant and  
14 probably due to the hydrobromic acid that's released in  
15 the lung or in lung tissue. So I think adding just  
16 that -- you know, showing the bromine coming off would  
17 make Figure 1 more complete.

18           Other than that, I think this has been -- this is  
19 a very well written report and make -- you know, I think  
20 it's a very good addition. The -- I did get some  
21 indication that U.S. EPA is -- either has designated it or  
22 is possibly -- is contemplating adding 1-bromopropane to  
23 the list of hazardous air pollutants. So I haven't  
24 followed up on that, but it might be worth double checking  
25 and adding that to the introduction if that is the case.

1           Other than that, I think this is a very good job.  
2 Thank you.

3           CHAIRPERSON ANASTASIO: Okay.

4           DR. BUDROE: Okay. And, Dr. Kleinman, one thing  
5 I want to note about the document structure is that the  
6 document is written so that essentially the part after the  
7 introduction can be put into Appendix B of the cancer  
8 technical support document. So that following section of  
9 the document fits that format, where most of the other  
10 they're essentially summaries. What goes into Appendix B  
11 is essentially really a summary of the whole document. So  
12 that's why the preface, the introduction that will not go  
13 into Appendix B, because it doesn't fit the format.

14           PANEL MEMBER KLEINMAN: Okay. Thank you.

15           CHAIRPERSON ANASTASIO: Thank you, John.  
16 Beate.

17           PANEL MEMBER RITZ: Yeah. So I really enjoyed  
18 reading this. Thank you for all your work on this  
19 document. I was quite surprised to see that 99 percent of  
20 the NHANES population and also that women -- pregnant  
21 women population had actually the metabolite in their  
22 urine and as measure. And then the documents says while  
23 we are not sure that the general population is actually  
24 exposed because this metabolite is not all that specific.  
25 But I couldn't really get how we could get to a 99 percent

1 detection rate, more or less, for this metabolite if it's  
2 not in the general environment. And I think that's not  
3 what the document really helps us understand currently,  
4 how the general population would be exposed.

5           So would it just be at hot spots where you're  
6 living near a facility and, you know, it's gassing off,  
7 and if you're closer to the facility maybe as a general  
8 community member you're exposed or would it be also in  
9 products that are in the home, in the laminate, or in the  
10 foam, or is that not the case? That I would -- I mean, if  
11 we're talking about population exposures, I think it would  
12 be worthwhile explaining that a little bit better.

13           DR. BUDROE: Okay. I -- Daryn, do you want to  
14 speak to that?

15           DR. DODGE: Yeah. I -- you know, I looked into  
16 this to try to figure out, well, what are these -- what  
17 are these individuals being exposed to and I couldn't come  
18 up with much. I don't have any other ideas about what  
19 could lead to this particular metabolite. And U.S. EPA in  
20 their review didn't really have anything to say about that  
21 either, except that there might be something else other  
22 than 1-BP that's resulting in this particular metabolite  
23 in urine.

24           But I can dig a little deeper and see, because  
25 I'm kind of interested in knowing as well why it seems to

1 be -- there seems to be a widespread exposure, you know,  
2 low levels, but still widespread. You know, the other  
3 thing I want to say is that, you know, in the worker  
4 studies where they're actually working with 1-BP, there is  
5 a really good association between urine levels of this  
6 metabolite and exposure. It's just it hasn't been done  
7 for the general population, the non-occupational.

8 PANEL MEMBER RITZ: Right. And, I mean, I didn't  
9 read those worker studies. Sorry. But did you see  
10 anything that also suggested that gassing off in the  
11 vicinity of the company or people who weren't directly  
12 working with the agent had the metabolites in the urine as  
13 well or only the workers who worked directly with them?

14 DR. DODGE: There -- you know, I can't -- I  
15 haven't been able to find any studies that looked at  
16 exposure to people living near facilities that are using  
17 this compound. There -- you mentioned earlier there could  
18 be consumer products that have 1-bromopropane in it and  
19 that could be a possible reason, you know, at least  
20 partially why the numbers seem to be so high for exposure  
21 in non-occupational situations.

22 CHAIRPERSON ANASTASIO: Daryn, do you think any  
23 of the halogenated propanes are going to give a similar  
24 metabolite, right, because it's just the propyl group that  
25 adds to n-acetylcysteine.

1 DR. DODGE: Yes, that could be. That -- some of  
2 these other brominated compounds that I mentioned that had  
3 been looked at in toxicology studies, they were only one  
4 or two carbon chains. There are -- you know, there's one  
5 three-carbon, but, yeah, I'm not sure what other compounds  
6 could result in this particular metabolite.

7 CHAIRPERSON ANASTASIO: Yeah. So maybe  
8 integrating across a whole family of brominated alkanes,  
9 yeah.

10 DR. DODGE: I will add that in one of the  
11 biomonitoring studies they did not find an association  
12 between cigarette -- secondhand cigarette exposure and  
13 these 1-bromopropane levels in the -- in the people. So  
14 it doesn't appear to be anything in cigarette smoke.

15 CHAIRPERSON ANASTASIO: Okay. Thank you.

16 Karen, do you have a comment? Oh, sorry. John,  
17 did you want to say something about that?

18 DR. BUDROE: Yeah, just that it's entirely  
19 possible that 1-BP was winding up in consumer products or  
20 in things like, you know, construction foam and  
21 remanufactured housing or something like that, and they're  
22 just, you know, not making an effort to inform everybody  
23 that they're actually using 1-BP in those products or  
24 applications. So that's kind of bad input data or no  
25 input data.



1 CHAIRPERSON ANASTASIO: Yeah. Karen, do you have  
2 a comment?

3 PANEL MEMBER MESSER: Yeah. I was struck by the  
4 high prevalence of this biomarker across the population.  
5 I thought -- but I couldn't find anything in the report to  
6 put into perspective the level. You know, it seemed to be  
7 about three nanograms per milliliter for these kids and  
8 pregnant women. And I didn't know whether that was really  
9 low or where it sit -- sat on the spectrum of the  
10 occupational exposure study. So if that kind of  
11 perspective is available, that would help.

12 CHAIRPERSON ANASTASIO: Yeah. Thank you, Karen.  
13 Kathy.

14 PANEL MEMBER HAMMOND: Yes. I think in general  
15 my comment relates to the exposure -- or the lack of  
16 exposure data in this. I just did a quick -- this is just  
17 Wikipedia. It says that its use has been increasing in  
18 the 21st century resulted from the need for a substitute  
19 for chlorofluorocarbons as a dry cleaning solvent.  
20 However, its use in dry cleaning has been steadily  
21 declining and it was nearly obsolete by 2020.

22 I just think that we do need to understand the  
23 exposures. I think particularly looking at what were the  
24 environmental levels compared to the occupational levels  
25 and what has been seen there. So, yeah, I wasn't sure why

1 there was not more in the occupation -- in the exposure  
2 area in the -- in the report, because that puts this into  
3 some context as to how important it is and how it is that  
4 people would be exposed.

5 CHAIRPERSON ANASTASIO: Right. Daryn, yeah, I  
6 remember there was no ambient concentration data, but I  
7 can't remember if you addressed that and there's just no  
8 data available. Could you say something about that?

9 DR. DODGE: I think I alluded to that in the  
10 report, but I can certainly emphasize that a little  
11 better.

12 CHAIRPERSON ANASTASIO: And there is no data  
13 available for ambient concentrations?

14 DR. DODGE: Not as far as I know, but we can take  
15 another look.

16 PANEL MEMBER HAMMOND: And NIOSH does have a  
17 hazard alert on this, right?

18 DR. DODGE: I'm not sure of that.

19 PANEL MEMBER HAMMOND: They do.

20 DR. DODGE: Okay.

21 PANEL MEMBER HAMMOND: I'll make that as a  
22 positive statement.

23 DR. DODGE: Okay.

24 CHAIRPERSON ANASTASIO: All right. Thank you,  
25 Kathy.

1 Any other comments?

2 PANEL MEMBER KLEINMAN: This is Mike. I just was  
3 wondering whether it would be useful to increase the list  
4 of comp -- you know, the ways in which this compound is  
5 used industrially. One of the ones that I noted was that  
6 it's used in the production of asphalt. And almost all of  
7 us have been out there on the street exposed when roads  
8 are being tarred and that sort of thing.

9 So there's a lot of opportunity if this stuff  
10 off-gases during that heated period for people to get, you  
11 know, some exposure. So it might be good to just expand  
12 the list of uses so people have a better idea of where  
13 they might be exposed.

14 CHAIRPERSON ANASTASIO: Okay. Thank you, Mike.  
15 Karen.

16 PANEL MEMBER MESSER: And I thought there was an  
17 opportunity to put the exposure levels in context against  
18 the cancer risk. I don't know. Maybe this isn't  
19 something that's usually done in these reports. But if --  
20 you know, the occupational exposure data that was there  
21 that was 460 milligrams per meter squared for sprayers,  
22 you could translate that into an increased cancer risk.  
23 And it's using the final model and it's not insignificant.  
24 So I thought that was an opportunity to say, yeah,  
25 there -- there are potential exposures that might be

1 important.

2 CHAIRPERSON ANASTASIO: Daryn, do you want to say  
3 something about occupational versus environmental  
4 exposures?

5 DR. DODGE: Yeah, I don't think we've done that  
6 in these documents before, but we might be able to add  
7 something to that effect.

8 PANEL MEMBER MSSSER: Then maybe it's not  
9 appropriate. It just did seem to me that occupational  
10 exposures are in an important range.

11 DR. BUDROE: Right. That starts to get into  
12 Cal/OSHA territory. So we -- technically, we're not  
13 involved with, you know, standards or even, you know,  
14 associating exposure and risk for workers.

15 PANEL MEMBER MESSER: Okay.

16 CHAIRPERSON ANASTASIO: Paul.

17 PANEL MEMBER BLANC: Yeah. A couple of comments.  
18 One, about this topic, I would say that the other comments  
19 that you've received about clarifying the metabolism  
20 pathway and emphasizing that this is debrominated is  
21 helpful to contextualize the metabolite, which actually  
22 isn't specific to this compound. By definition, it  
23 doesn't have bromine in it. So in terms of the  
24 theoretical possibilities of what this biomarker  
25 represents is contextualized better by emphasizing that.

1           But my main question is a completely different  
2 topic and touches more on our generic approaches to  
3 things. As you point out very clearly, you're using for  
4 the rat models a formula that was developed by OEHHA in  
5 2018, but that for mice conversion you're using a 40-year  
6 old formula.

7           And so this is a question not about this document  
8 nor anything that I'm suggesting you change. But is the  
9 reason why we never developed an OEHHA-specific formula  
10 because we more likely than not tend to use rat data and  
11 not mouse rodent data or is it because the feeling was  
12 that the formula from 1988, or '83 - maybe it was from  
13 83 - is -- still holds up and doesn't need to be  
14 revisited?

15           DR. BUDROE: Hey, Daryn, I think I can speak to  
16 this one.

17           DR. DODGE: Yeah. Thank you.

18           DR. BUDROE: Yeah. The 1983 equation was  
19 actually developed by U.S. EPA. Anderson et al. was a  
20 U.S. EPA research group. And we went back, we updated.  
21 There were sufficient new data sets in rats to be able to  
22 correlate inhalation rate with body weight that we were  
23 able to develop a different rat breathing rate equation.  
24 We looked at the mouse data and there weren't enough new  
25 good data sets to be -- to go ahead and redo, essentially

1 supplant, what Anderson already had put out there. So  
2 it's a question of, you know, what data is available to  
3 work with in the literature. And for mice, there just  
4 wasn't enough new data to work with of sufficient quality.

5           PANEL MEMBER BLANC: Okay. Well, that's helpful.  
6 And maybe this comes back to that question about what's in  
7 our policy document and what's not. And as long as you  
8 guys are on top of it, so that if such data do develop,  
9 you do do that exercise, I think I, from my part, would be  
10 supportive of that. And because it is a little bit of  
11 disequilibrium there to have one thing updated, you know,  
12 three years ago and another one that's 40 years old.

13           CHAIRPERSON ANASTASIO: All right. Thank you,  
14 Paul.

15           Kathy.

16           PANEL MEMBER HAMMOND: Yeah. First, I would say  
17 I do think it's relevant that -- I know that Cal/OSHA is  
18 in charge of regulations, but the point isn't to -- that  
19 you -- that means you can't talk about occupational  
20 exposures. I think the point is to understand what the  
21 occupational exposures are and compared with environmental  
22 exposures.

23           Also, it's -- a quick little Googling here, I see  
24 that it's used in some cleaning products in the home, so  
25 that might be one of the reasons that it's showing up in

1 the general population. And if -- you know, I -- this is  
2 a quick thing and it needs to be done more thoroughly.  
3 But if that's true, I think that's worth mentioning. I  
4 mean, I would follow that up a little closer and make sure  
5 that's still true. But, that looking -- it's used in  
6 two -- at least two consumer products, so --

7 CHAIRPERSON ANASTASIO: Thank you, Kathy.

8 PANEL MEMBER HAMMOND: Yeah.

9 DR. BUDROE: Okay.

10 CHAIRPERSON ANASTASIO: Lisa, anything to add?

11 PANEL MEMBER MILLER: I'm sitting quietly  
12 listening to all of this. The main takeaway for me, and I  
13 can't add anything technical to this, but what struck me  
14 is -- related to the comments that several of the Panel  
15 members brought up is the lack of perspective in terms  
16 particularly in exposures to the general population. And  
17 I think this is important in -- I understand the issues  
18 with the occupational exposure component. But the issue  
19 here is that at this point in time, we don't see evidence  
20 of development of cancer in the human population most  
21 likely due to the duration at which this product has  
22 actually been -- has been out there in terms of exposure.  
23 So because of that, I think having that information on  
24 what people are being exposed to, whether it's, you know,  
25 ambient or whether it's occupational.

1           One of the things that I think Mike brought up  
2 very briefly in terms of the respiratory response, the  
3 inflammatory response, when I did a quick skim of PubMed,  
4 it's -- it was clear to me. There aren't a ton, but there  
5 are some studies reporting symptoms associated with  
6 inhalation, both dermal and respiratory symptoms, and  
7 again, I think they may be, you know, due to some of  
8 the chemical actions of this -- of this compound once it  
9 is released into the air.

10           But that said, I think having the dosimetry  
11 information, in addition to what's provided, I think  
12 it's -- what I could skim from the document was that there  
13 is one study that is presented and maybe it's because it's  
14 perhaps the most high quality study that you were able to  
15 identify. But it would be helpful to gather as much  
16 relevant dosimetry data that is available and provide it,  
17 so that the reader gets some perspective on what -- you  
18 know, what individuals, whether occupational or  
19 unoccupational exposures, are going through, because  
20 again, it's sort of a wait and see at this point in time.

21           So I think it would -- it would strengthen the  
22 data that have been obtained so far from the animal  
23 studies.

24           CHAIRPERSON ANASTASIO: Okay. Thank you, Lisa.

25           I just had a few comments. One was on page one,



1 you know, so this is a very volatile chemical. And the  
2 animals are exposed to aerosols, right? But those  
3 aerosols must have evaporate pretty much immediately. So  
4 I'm wondering if they had good control on their actual  
5 exposures on the gas phase concentrations that the animals  
6 are exposed to.

7 I'm looking at you, Daryn.

8 (Laughter.)

9 DR. DODGE: Okay. I was writing down your  
10 question.

11 CHAIRPERSON ANASTASIO: Oh, sorry. Feel free to  
12 finish.

13 DR. DODGE: Yeah, well, you're talking about the  
14 NTP study, is that correct?

15 CHAIRPERSON ANASTASIO: Yeah. This is on page  
16 one -- let's see, dah, dah, dah, dah. Yeah, it's the NTP  
17 study. You know, you talk about a uniform aerosol  
18 concentration, but I feel like for a volatile -- a very  
19 volatile species, it's a little counterintuitive to talk  
20 about an aerosol concentration. I understand that's the  
21 generated aerosol, but it must immediately evaporate.

22 DR. DODGE: Yeah. You know, I -- they go into  
23 pretty -- a lot of detail on their methodology on how they  
24 generate the aerosol or gas. I can clarify that in the  
25 report what they're actually measuring.

1 CHAIRPERSON ANASTASIO: Okay. Yeah. It would be  
2 helpful maybe just to -- you know, when you -- maybe just  
3 to clarify, it's initially applied as an aerosol, but it's  
4 expected to be immediately evaporate and give the reader  
5 some confidence that they actually measure gas phase  
6 concentrations or have some understanding of what the  
7 actual gas phase concentration is.

8 DR. DODGE: Okay. Yeah, I can do that.

9 CHAIRPERSON ANASTASIO: The other comment I had  
10 was, you know, you talked about these kind of comparison  
11 structures of small bromoalkanes. I don't know if there  
12 are inhalation unit risk factor values for some of these  
13 other compounds. But at the end when you show the IUR of  
14 1-BP, it would be nice to compare that to some of these  
15 other structures. Just give us a sense, are they similar  
16 in terms of cancer potential or are they wildly different?  
17 Just for me, it would have given me a little closure on  
18 that question.

19 DR. DODGE: You know, that is a good question.  
20 Two of the compounds that I mention in there that are  
21 similar to 1-bromopropane, I believe are actually oral  
22 studies or gavage studies, two-year studies. So it's --  
23 it may be a little difficult to compare to an inhalation  
24 study.

25 CHAIRPERSON ANASTASIO: Yes. Right. Yeah, it

1 would have to be an inhalation study for the comparison to  
2 be meaningful, I think.

3 DR. DODGE: But they did result in similar types  
4 of tumors, whether it was for orally administered or  
5 inhalation.

6 CHAIRPERSON ANASTASIO: Yeah. Okay.

7 Well, if any of them had inhalation exposures,  
8 the resulting IURs would be helpful, just for comparison.

9 DR. DODGE: Sure I'll make sure of that.

10 CHAIRPERSON ANASTASIO: Okay. That would be  
11 great.

12 Two other minor comments. One is I really  
13 appreciated the quick explanation of terms for those of us  
14 who are not toxicologists, having a one sentence  
15 description of what it is a micronuclei or whatever else.  
16 That was really helpful, so thank you for doing that. And  
17 I really hope you guys will continue that moving forward.

18 And then also this is something Beate brought up  
19 a while ago, you know, not just putting the asterisks for  
20 P less than 0.05, but it was very helpful to have the P  
21 values in the table. So thank you for doing that again.  
22 But it just helps understand how close are you to  
23 different levels of significance.

24 Okay. So any other comments on 1-bromopropane?

25 Seeing none. I'd like to thank Daryn and OEHHA

1 for the document and for bringing it to us today.  
2 Obviously, there was wide spread agreement. It was --  
3 it's a good document and it's a good IUR value. With  
4 that, we're going to move into a short break time. So I  
5 currently have 11:18. We're going to take a 10-minute  
6 break. So we will reassemble at 11:28. And I will see  
7 you then.

8 (Off record: 11:18 a.m.)

9 (Thereupon a recess was taken.)

10 (On record: 11:28 a.m.)

11 CHAIRPERSON ANASTASIO: All right. Welcome back,  
12 everyone. Panel members, if you can turn your cameras on,  
13 then I'll know you're with us.

14 DR. DODGE: Hi, Cort. This is Daryn. I'm here  
15 even though my camera is not working.

16 CHAIRPERSON ANASTASIO: Great. Thank you for  
17 letting me know Daryn.

18 DR. DODGE: Okay.

19 CHAIRPERSON ANASTASIO: All right.

20 So Joe. Mike and Ahmad, are you with us?

21 Mike, Ahmad, are you guys here?

22 PANEL MEMBER BESARATINIA: I'm back. Sorry, I'm  
23 back.

24 CHAIRPERSON ANASTASIO: Great. Thank you, Ahmad.

25 PANEL MEMBER BESARATINIA: Sorry.

1           CHAIRPERSON ANASTASIO: That's okay.

2           Mike, are you back? Well, okay, I am sure Mike  
3 will join us shortly, but I'd like to get started again.  
4 So the next, and second, and last major agenda item for us  
5 today is a discussion of AB 2588, the Hot Spots Emission  
6 Inventory Criteria and Guidelines Regulation.

7           So I just want to clarify something for the  
8 public. The Scientific Review Panel does not take public  
9 comments on health guidance values. So I couldn't address  
10 any comments that we received on the 1-bromopropane  
11 document.

12           On this upcoming 2588 topic, we will not be  
13 taking comments on the first portion, which is just a  
14 retrospective of what CARB has done related to updating  
15 Appendix A, but we will be taking comments on the second  
16 part of the 2588 discussion. And I'll talk a little more  
17 about that once we get to part two of the discussion.

18           So as a preface to part one of the discussion,  
19 the retrospective, just remind the Panel that starting in  
20 June of 2019, CARB staff updated us on AB 2588 Air Toxics  
21 Hot Spots Emissions Inventory Criteria and Guideline  
22 Regulation. And we had multiple meetings about the topic.  
23 And then, CARB worked with other stakeholders as well and  
24 then in November of 2020, CARB's Board adopted the  
25 proposed amendments to this program. So there are many

1 more substances now in Appendix A than there were before  
2 this revision.

3           In the first part of today's 2588 update, CARB  
4 staff is going to give us a summary of the amendment  
5 process, and then in part two, they'll discuss with us  
6 what to do moving forward and have several questions for  
7 the Panel to talk about how to move forward and future  
8 pathways. So again, after part two, we will open the  
9 floor to the public comment, but not for part one.

10           So Gabe Ruiz, who is the manager of CARB's Toxics  
11 Inventory and Special Projects Section in the Air Quality  
12 Planning and Science Division, is going to start us off  
13 with a presentation on part one and is going to give us a  
14 brief recap of the ICG amendment process.

15           So, Gabe, take it away.

16           (Thereupon a slide presentation.)

17           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
18 RUIZ: Thank you, Cort. Good morning, members of the  
19 Panel. Good morning, everyone else. As many of you are  
20 probably aware, we recently took to our Board a number --  
21 a number of proposed amendments to the AB 2588 Emission  
22 Inventory Criteria and Guidelines Regulation, or EICG.  
23 And in the course of developing these amendments, we had a  
24 number of consultation meetings minutes with you about our  
25 proposed revisions to the Appendix A chemical list.

1 Today, we have prepared a two-part presentation to provide  
2 you with a status update on the amendments to the chemical  
3 list and to share a prospective discussion that we hope  
4 will inform future revisions.

5 Next slide, please.

6 --o0o--

7 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

8 RUIZ: In part one of the presentation I will provide a  
9 brief recap of the AB 2588 Air Toxics Hot Spots Program, a  
10 summary of our previous discussions with the Panel and the  
11 recommendations you provided, and an update of the current  
12 status of the amendments.

13 I will then pause for, you know, some questions  
14 about the status so far. And then in part two, I will go  
15 over our proposed plan for a five-year review and update  
16 cycle, and we'll present some questions that we would like  
17 to pose to you about the process. I will then -- I will  
18 then end with a brief overview of the next steps.

19 Next slide, please.

20 --o0o--

21 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

22 RUIZ: The Air Toxics "Hot Spots" Information and  
23 Assessment Act, also referred to as AB 2588, was signed  
24 into law in 1987 to address public concerns about  
25 potentially significant exposure to air toxics emitted by





1 2020, in which we presented our proposed revisions to the  
2 chemical list and requested your input and scientific  
3 expertise in evaluating and validating our technical  
4 approach.

5 In October of 2019, after reviewing the initial  
6 list of proposed new substances, you gave us  
7 recommendations on additional chemicals that we should  
8 consider for addition to the list. In November of 2019,  
9 we provided an update on the substances we had added based  
10 on your recommendations and you provided additional  
11 guidance.

12 And then in February of 2020, you issued an  
13 interim findings letter conveying the Panel's support for  
14 the proposed revision to the chemical list.

15 Next slide, please.

16 --o0o--

17 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
18 RUIZ: Some of the recommendations made by members of the  
19 Panel during our discussions included reviewing chemical  
20 lists published by the American Conference of Governmental  
21 Industrial Hygienists, or ACGIH, the National Institute  
22 for Occupational Safety and Health, or NIOSH, and the  
23 Olson Toxicology Handbook.

24 Additionally, you recommended that we consider  
25 adding aldehydes, isocyanates, freons, and other

1 fluorocarbons, as well as methylating agents, epoxides,  
2 strobins, and rare earth metals. The Panel also expressed  
3 support for our proposal to add three broad classes of  
4 chemical bays -- of chemicals based on their functional  
5 group. Specifically, these functional groups include  
6 isocyanates, poly and perfluoroalkyl substances, or PFAS,  
7 and halogenated polycyclic aromatic compounds. The Panel  
8 concluded that these functional groups can be reasonably  
9 expected to pose a threat to public health when present in  
10 ambient air.

11 In addition to seeking your input on the  
12 revisions to the EICG chemical list, OEHHA and CARB also  
13 made presentations on the concept of developing  
14 provisional health guidance values. These presentations  
15 noted that the process for developing peer-reviewed health  
16 guidance values can be very lengthy and resource  
17 intensive.

18 Since many of the new added -- newly added  
19 chemicals do not yet have peer-reviewed OEHHA health  
20 values, we propose the development of provisional health  
21 values that could be used as a screening tool to identify  
22 chemicals of concern.

23 The Panel expressed support for this concept and  
24 encouraged our continued collaboration with OEHHA to  
25 develop similar methodologies for developing provisional

1 health values.

2 Next slide, please.

3 --o0o--

4 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

5 RUIZ: So based on your recommendations, we added more  
6 than 100 substances from the ACGIH list and 20 additional  
7 NIOSH substances. We also added several individual  
8 isocyanates and rare earth metals, as well as a few  
9 methylating agents and strobins. Additionally, we added  
10 over 200 PFAS -- individual PFAS substances, in addition  
11 to the PFAS functional group.

12 Per Dr. Kleinman's request, we also added  
13 language to the regulation text to create a mechanism for  
14 public input in the nomination of new substances proposed  
15 for addition to the list.

16 We also initiated discussions with OEHHA staff on  
17 the development of provisional health values and tried to  
18 continue further discussions as part of the next steps.

19 Next slide, please.

20 --o0o--

21 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

22 RUIZ: So as you may know, our Board adopted the updated  
23 chemical list at the November 2020 Board hearing. We  
24 would like to thank Cort for testifying in support of the  
25 amendments and for conveying the support of the entire

1 panel for the work that we did in updating this chemical  
2 list.

3           At the Board's recommendation, we continued our  
4 outreach with stakeholders, which resulted in additional  
5 modifications to the regulation through what we refer to  
6 as 15-day changes. The most significant of these changes  
7 include an adjustment to the phase-in schedules for some  
8 chemicals and the addition of several individual PFAS  
9 substances. The original proposed could have a phased-in  
10 approach for new chemicals to create a more manage --  
11 manageable workload for facilities and air districts. The  
12 phase-in schedule allowed for two phases with the first  
13 group of substances phasing in on the first year of  
14 implementation and the second group phased in four years  
15 later.

16           In response to concerns that quantification  
17 methods are not available for many substances, we moved  
18 several chemicals to a later phase. We also added several  
19 individual PFAS substances to the individual list of  
20 chemicals that must be reported if they are needed and  
21 include a PFAS target list that facilities in the  
22 wastewater treatment sector must test for as they develop  
23 their source testing programs.

24           The final regulatory package is now undergoing  
25 final review by the Office of Administrative Law. And if

1 everything goes as planned, we anticipate that the  
2 amendments will become effective by early 2022.

3 So next slide, please.

4 --o0o--

5 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

6 RUIZ: This concludes part one of my presentation. I  
7 would now like to open the floor for questions from the  
8 Panel about the process so far, before we launch into a  
9 prospective discussion in part two.

10 CHAIRPERSON ANASTASIO: Great. Thank you very  
11 much, Gabe, and also congratulations to CARB on this much  
12 needed update on the Appendix A. That's great to move  
13 that forward.

14 Panel members, comments on the retrospective  
15 portion of AB 2588.

16 Yes, Paul.

17 PANEL MEMBER BLANC: In terms of the list of 110  
18 plus substances that you referred to, based on ACGIH, and  
19 NIOSH, and others, will you be circulating list to us?

20 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

21 RUIZ: Certainly. I think we can do that. We are working  
22 on a supplemental document. So you probably are familiar  
23 with, you know, the formal regulatory Appendix A. It  
24 includes, you know, things like chemical name, ID, source  
25 list, you know, whether it's a carcinogen or not, and a

1 few other pieces of information. We are working on a  
2 supplemental appendix -- or a supplemental guidance  
3 document that actually will include more information.  
4 And, yeah, we can circulate both the full list and also an  
5 abbreviated list that specifically updates the -- or  
6 states the substances that we're --

7 PANEL MEMBER BLANC: Yeah, I think what we'd  
8 like -- what I'd like to see is not the full list, but  
9 just the new ones that you're suggesting, because it would  
10 help us close the loop. Our discussion was more than two  
11 years ago, I think. And so I'm not even going to, you  
12 know, necessarily remember the things that we highlighted,  
13 but it would be useful to me as Panel member and I think  
14 to other, to see how our suggestions translated into  
15 concrete recommendations.

16 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
17 RUIZ: Okay.

18 PANEL MEMBER BLANC: You know, for example, which  
19 rare earth substances? I think it would just help us.  
20 And if -- and if any of us saw something that was like  
21 wait, how could that be there and not the other thing, we  
22 could give you early feedback.

23 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
24 RUIZ: Certainly. Thanks. And just -- I just want to  
25 remind you that we did -- as part of our, you know, update

1 process, we did kind of check back with you -- you know,  
2 members of the Panel regularly and provided updated  
3 documents. But yeah, it would be probably way too  
4 detailed, you know, for you to be able to see specific  
5 short list of ACGIH, but we will -- we will create that  
6 and forward that to you.

7 CHAIRPERSON ANASTASIO: Yeah. Just to remind  
8 Paul, you know, we did have multiple meetings about this.  
9 And at several points, we received spreadsheets with the  
10 new substances that were proposed. I don't remember if we  
11 ever got one at the end that had everything that we had in  
12 it, so that would be great, Gabe, if you could provide  
13 that.

14 PANEL MEMBER BLANC: Yeah. That's all. That's  
15 all. I'm not impugning anything.

16 CHAIRPERSON ANASTASIO: Yeah.

17 PANEL MEMBER BLANC: It just would be helpful to  
18 have that.

19 CHAIRPERSON ANASTASIO: Yeah. Other Panel member  
20 comments?

21 All right. Seeing none, let us think about --  
22 oh, wait. Sorry. Mike Kleinman with a last minute  
23 addition. Mike, go ahead.

24 PANEL MEMBER KLEINMAN: Last minute. I just  
25 wanted to raise the issue, PFAS was mentioned. And we

1 should remember that there are something like 9,000  
2 different PFAS- and PFOA-type compounds that are  
3 continuously being added to the list of chemicals that are  
4 being used industrially and in other applications. So as  
5 we start thinking about that as a group in some way trying  
6 to understand how to characterize those or categorize them  
7 may be very important going forward.

8 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

9 RUIZ: Yes. So one of the things that we did was, you  
10 know, as I mentioned the entire chemical group, so any  
11 substance that has a PFAS chemical group or that it can be  
12 classified as a PFAS, if it's emitted by any facilities in  
13 the State, then they have to report it.

14 We also understand, you know, there's a lot of  
15 times not a -- there's no methods to quantify those  
16 emissions yet or even to detect in the air. So we did  
17 allow for, you know, some provisions that facilities that  
18 use or produce these chemicals, we're going to have to --  
19 please let us know how much they're using, how much  
20 they're producing.

21 But we also developed a couple of very targeted  
22 lists of chemicals. And we -- for that, we used EPA  
23 proposed test methods under development, you know, to  
24 identify the specific substances that they will be asking  
25 wastewater managers to report. And so there's a list of



1 roughly, I want to say, about 170 chemicals that could  
2 potentially -- I mean, that are identified individually in  
3 our list and that could potentially be having a detection  
4 method developed in the near future.

5 PANEL MEMBER KLEINMAN: Thank you.

6 CHAIRPERSON ANASTASIO: Okay. Great. Thank you,  
7 Mike.

8 Any other comments?

9 Okay. So then let's think about moving into part  
10 two. So part two, as I mentioned, is going to be the  
11 prospective discussion on future updates to Appendix A of  
12 the EICG. And they're going to invite discussion of  
13 potential future pathways for the Hot Spots Program. And  
14 so we'll be talking about, you know, how do we -- how does  
15 CARB update the appendix in the future?

16 So Gabe is going to give his presentation, then  
17 the Panel will have a discussion, and then we will open it  
18 up to members of the public. So any member of the public  
19 who would like to comment, I encourage you to either raise  
20 your hand, and then I will call on you or you can submit  
21 your written comment in the chat. Please don't do both,  
22 because then it gets just more confusing to keep track of  
23 all the comments and which ones we've already addressed.

24 We, as a Panel, and certainly CARB, as an agency,  
25 are particularly interested in hearing about potential

1 ways we might support air quality improvements and health  
2 protection at the community level. Okay. So I bring it  
3 back to Gabe, who will give us the part two presentation.

4 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

5 RUIZ: Thanks again, Cort. So yeah, in part two of this  
6 presentation, we're going to be asking for your  
7 recommendations and feedback on the ways that we, you  
8 know, could improve the process for updating the chemical  
9 list, in particular, when it comes to the engagement of  
10 the Scientific Review Panel.

11 So next slide, please.

12 --o0o--

13 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

14 RUIZ: In order to obtain the program's goal of protecting  
15 public health, it is critical to update the chemical list  
16 on a regular basis. So to that end, we have developed a  
17 plan to update the list on a recurring five-year cycle.  
18 And with this plan, we would implement an iterative  
19 process in years one to three to identify and evaluate  
20 candidate substances in consultation with OEHHA and DPR  
21 staff. That's the Department of Pesticide Regulation.

22 In years three and four, we would engage the  
23 Panel to provide state-of-the-science input and  
24 recommendations on the proposed list, and we would also  
25 begin the public rulemaking process. We have workshops or

1 other opportunities for public engagements.

2           On year five, after modifications to the list  
3 based on recommendations by the Panel and public input, we  
4 would present the final chemical list to our Board for  
5 consideration as part of a formal amendment to the EICG  
6 regulation.

7           So with the above five-year plan in mind, we  
8 would like to ask the Panel the following questions.

9           Next slide, please.

10                               --o0o--

11           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

12 RUIZ: So the first questions pertain to the timing and  
13 the process itself. First question is, does the time  
14 frame for engaging the Panel in years three and four of  
15 the review cycle seem reasonable?

16           And the second question is, based on your  
17 experience in the last round of updates, should we  
18 consider making any modifications to the Panel engagement  
19 process?

20           And, Cort, I don't know if you would like us to  
21 initiate the discussion now or would you refer that I go  
22 through all the questions and then --

23           CHAIRPERSON ANASTASIO: I can keep very few  
24 things in my mind at once, Gabe, so let's go slide by  
25 slide.

1 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

2 RUIZ: Okay.

3 CHAIRPERSON ANASTASIO: So, Panel members, any  
4 input on these questions?

5 Well, I'll start the discussion. To me, it seems  
6 like the time frame for engaging us is good. You know,  
7 this essentially means, you know, every four years, we'll  
8 see you talking about updates. And I know that it had  
9 been quite some time between the previous update and this  
10 current update. So I suspect that the next round will be  
11 much smaller than what we've seen in this current round.  
12 So this kind of time frame seems reasonable to me.

13 Kathy, your thoughts?

14 PANEL MEMBER HAMMOND: Yeah. I'm wondering is  
15 this an ongoing plan? Is the proposal that it would be --  
16 this would be a five-year cycle that would continue  
17 ongoing, so the --

18 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

19 RUIZ: Yes.

20 PANEL MEMBER HAMMOND: Okay. Great.

21 And other than that, yeah, I guess -- I guess  
22 this does make sense, yeah. I was trying to think whether  
23 you should inform us during that first couple of years,  
24 but yeah, I think waiting for the third year would be  
25 fine.

1           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

2   RUIZ:  Yes.  And also, you know, five year is kind of a,  
3   you know, goal, I mean, give or take a year -- give or  
4   take a year.  So, you know, it could be six years, but we  
5   plan to keep this on a pretty tight schedule, if we can.  
6   Yeah, what we are trying to avoid is having 800 chemicals  
7   to review, you know, the next time around.  So hopefully,  
8   as Cort said, it will be a much smaller number.

9           CHAIRPERSON ANASTASIO:  Thank you, Gabe.

10          Panel members, any comments on the second  
11   question in terms of should CARB modify how they're  
12   engaging with the Panel, getting our input about this  
13   process?

14          AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

15   RUIZ:  And if I can offer some, you know, I guess,  
16   information to jog your memory.  When we first presented  
17   the list of chemicals to you, you know, we were asked to  
18   do it in PDF documents, also to present the full proposed  
19   list.  You know, so after we got some feedback from, you  
20   know, individual members, some people preferred actually  
21   to see an Excel version of the -- of the document.  And  
22   other members asked for a clean copy of the existing  
23   version and then modified copy, you know, with the  
24   chemical.

25          So we definitely are able to, and willing to,

1 provide anything that would make your review easier, you  
2 know. So if -- before we even get started on the next  
3 round if you let us know whether you have any specific  
4 preferences, then we would take that into consideration as  
5 we plan our return, you know, to update you on the next  
6 proposal.

7 CHAIRPERSON ANASTASIO: Yeah. Okay. Thanks,  
8 Gabe. Yeah. I thought the Excel and the PDF was very  
9 helpful. Of course, if moving forward we decided  
10 something else might be helpful, we'll let you know.

11 Mike, you have a comment.

12 PANEL MEMBER KLEINMAN: Yes. To me, the Excel  
13 spreadsheet was the most useful. And highlighting within  
14 the Excel spreadsheet, the new additions and maybe a color  
15 code for what stage of consideration they're at could be  
16 helpful to focus our attention.

17 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
18 RUIZ: Okay.

19 CHAIRPERSON ANASTASIO: Thank you, Mike.  
20 Kathy.

21 PANEL MEMBER HAMMOND: I agree with what Mike  
22 just said. And in turns out, I agree with someone on the  
23 chat, but I had raised my hand ahead of time on this. I  
24 think it might be important also to list some sort of  
25 prioritization on these lists, so that, you know, whether

1 it's one, two, three -- you know, categories one, two, and  
2 three, or something, because -- and if there are a lot of  
3 chemicals, you're not going to be able to do them all  
4 simultaneously and make apparent what is the way in which  
5 you prioritize, both by degree of exposures, you know, the  
6 number of people, the extent of the exposures, and  
7 whatever is already known by the toxicity. But, you know,  
8 it's not an easy thing to do, but I think it should be  
9 transparent how you're prioritizing.

10 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

11 RUIZ: Thank you.

12 CHAIRPERSON ANASTASIO: So just from my

13 clarification and maybe the rest of the Panel's, so Gabe,  
14 you know, CARB makes a list of Appendix A chemicals, but  
15 OEHHA decides on the prioritization for health guidance  
16 values, is that correct?

17 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

18 RUIZ: Yes, that's correct.

19 CHAIRPERSON ANASTASIO: Okay. Yeah.

20 Other comments about these two questions?

21 Yes, go ahead, Paul.

22 PANEL MEMBER BLANC: So just a follow-up to that

23 last question, you submitted a list of new things to add  
24 and you're waiting for CARB to approve that list, do I  
25 understand that process part correctly?

## AQPSD TOXICS INVENTORY &amp; SPECIAL PROJECTS MANAGER

1  
2 RUIZ: So we updated the list of chemicals that must be  
3 reported to CARB. And so we went from roughly 450 that  
4 had existed on the list for the last, you know, many -- 15  
5 years maybe. We added over 900 new chemicals, many of  
6 them came from lists that we are required to review and  
7 then -- you know, there's six lists in statute that we are  
8 required to check and those substances that can become  
9 airborne to our list of reportable substances.

10 And then there were maybe another three to four  
11 hundred chemicals that we reviewed in consultation with  
12 OEHHA and DPR to determine whether -- you know, first of  
13 all, can they become airborne, and second do they present  
14 some short potential health risk to public health.

15 So we have this list. It was approved -- the  
16 list -- or the updated list was approved by our Board  
17 about almost a year ago now. So we have been working on,  
18 you know, finishing up the regulatory process. And it's  
19 still -- the whole package is now under review by the  
20 Office of Administrative Law, which is almost the last  
21 step before the regulation amendments become official.

22 So barring any, you know, last minute issues,  
23 which we don't anticipate, the OAL, you know, will  
24 approve -- we're hoping they will approve our package.  
25 And then it goes to Secretary of State, and then, at that



1 point, the regulation becomes -- or the amendments become  
2 effective.

3           The second part is OEHHA's role in this. I mean,  
4 they played a very, you know, strong support role in  
5 helping us identify and -- identify the chemicals that  
6 should be added. But for further down the road, they will  
7 be developing peer-reviewed health values for some of  
8 these chemicals. And this list helps in their  
9 prioritization, but it's not a requirement that they take  
10 all the chemicals from our list.

11           PANEL MEMBER BLANC: Right. And that's certainly  
12 back to this question of prioritization, because I think  
13 from our point of view, perhaps more important than what's  
14 on this master list is what is -- what are the priorities  
15 for them developing a closer look? And I think it was  
16 stated that that's going to be the Air Resources Board  
17 that makes -- that drives that prioritization, or will it  
18 be OEHHA itself, or -- I'm still not clear on that part.  
19 Because to us, that was always -- historically has been  
20 the issue, as much as adding new chemicals to the  
21 possibility of being prioritized.

22           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
23 RUIZ: Yeah, I would say the -- at least, you know, when  
24 it comes to the emission inventory that we create, it's --  
25 that is part of the kind of feedback loop. I mean, so it

1 does inform, to some extent, OEHHA's decision to  
2 prioritize certain chemicals, you know. And, I mean, we  
3 do have regular conversations with John Budroe about, you  
4 know, do we have this chemical in the inventory, what are  
5 the emissions that are being reported to us?

6 But they also look at other data bases, you know,  
7 where facilities are required to report to EPA, for  
8 instance, PRIs and other source. And I'm sure John can,  
9 you know, provide more information on that.

10 But, yeah, so what we see this as is we create a  
11 list of chemicals that we think should be reported, but  
12 are not being reported, then we get a sense of, well, how  
13 much of it is being used. And then maybe looking at, you  
14 know, some of these provisional health values determine  
15 how -- what is the potential for some of these chemicals  
16 to become a localized health issue. And, you know,  
17 something what would inform OEHHA's decision to, okay, we  
18 need to develop health values for these particular  
19 chemical. So it's all part of a feedback loop, like I  
20 said.

21 DR. BUDROE: Right. And that includes the air  
22 districts also, because they have an idea of what their  
23 facilities are emitting and they -- and come up with  
24 concerns. They get input from their communities and --  
25 you know, that's one of the -- one of the input sources

1 that we have also.

2 CHAIRPERSON ANASTASIO: Yeah. Thank you, John.  
3 Thank you, Gabe.

4 Joe, comment?

5 PANEL MEMBER LANDOLPH: Yeah. I was thinking  
6 about this last meeting too and it carried over to this  
7 one. It seems to me you almost need some risk assessment  
8 calculations, like which chemicals - and I'll focus on  
9 carcinogenicity first - have the highest cancer slope  
10 factors, and multiply that by the concentration, and see  
11 which stick up like the weeds above a lawn, and go after  
12 those.

13 And the same thing with toxicity, use the  
14 toxicity slope factor and multiply that by their -- you  
15 know, the concentration that you measure, that you can  
16 assume is an average concentration and do a screening like  
17 that to get the really bad actors out of the pile first  
18 would be a suggestion.

19 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
20 RUIZ: Yeah. Thanks. So what we're trying to do, and so  
21 the reason why we need to update our regulation is, yeah,  
22 there's a lot of, you know, emerging or new chemicals,  
23 things that were not in use, you know, 20 years ago. So  
24 through our contacts with environmental advocates,  
25 we've -- environmental scientists, we have -- we

1 learned -- you know, during our regulatory public process,  
2 we learned about chemicals that, you know, should have  
3 been added to the list many years ago and we have not done  
4 that yet.

5           So the first bit for us is always -- you know, to  
6 determine, well, is this chemical being emitted in  
7 California and in what numbers? And then that informs,  
8 you know, well, the decision to prioritize a particular  
9 chemical -- a particular group of chemicals for further  
10 review by OEHHA to determine, you know, what those health  
11 risk numbers are.

12           So we work closely together, but we have to start  
13 somewhere. And putting those chemicals on the list that  
14 must be reported is the first step. And otherwise, we  
15 would be speculating, you know, whether something is being  
16 emitted or not in the state. And we could potentially be  
17 misusing OEHHA's resources, you know, to the first -- go  
18 after something that is not -- that does not represent a  
19 risk in the State.

20           PANEL MEMBER LANDOLPH: Yeah. As long as you're  
21 working with OEHHA and to have them do risk assessment  
22 calculations, that would be fine. One of the things I  
23 hate to see and I think we have to think about it in terms  
24 of regulation is, you know, we're getting longer and  
25 longer lists of chemicals. And, you know, some of them

1 fade out, because they don't have a really high slope  
2 factor, whether for toxicity or cancer, and the exposure  
3 concentrations may be small, given a product, which is  
4 small.

5           So I think it's important that we go after those  
6 that are -- you know, have high slope factors say for  
7 cancer, for carcinogenesis, and high concentrations, and  
8 pull those out of there and focus attention on them, so  
9 that we can get the most action per dollar invested and  
10 help protect the health of the people.

11           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
12 RUIZ: Thank you. I think that's exactly our aim too. So  
13 we concur with your assessment.

14           CHAIRPERSON ANASTASIO: Yeah. Thank you, Joe.

15           PANEL MEMBER LANDOLPH: Thank you.

16           CHAIRPERSON ANASTASIO: Gabe, let's go to the  
17 next slide, your second list of questions.

18           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
19 RUIZ: Okay. So next slide, please.

20   --o0o--

21           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
22 RUIZ: Some of these questions, you know, we have already  
23 touched upon in our first -- in responses to our first  
24 question. But yeah, this question is specifically about  
25 the identification of emerging chemicals. And so does the

1 Panel have recommendations on the approach or resources  
2 that we should consider when identifying candidate  
3 chemicals for addition to the list?

4 And as I mentioned earlier, you know, during the  
5 last panel updates, you pointed us to three very useful  
6 resources that were ACGIH -- ACGIH, NIOSH, and the Olson  
7 Toxicology Handbook. So we're wondering, you know, if you  
8 have any other resources in mind that, you know, off the  
9 bat, we should consult when we create the next list of  
10 candidate substances?

11 CHAIRPERSON ANASTASIO: Kathy, go ahead.

12 PANEL MEMBER HAMMOND: Those sound good. And I  
13 couldn't I -- you blocked out for a minute there, but if  
14 you said it, my apologies. The REACH list, the European,  
15 I mean, I would definitely look -- be monitoring that.

16 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
17 RUIZ: Okay.

18 CHAIRPERSON ANASTASIO: Joe.

19 PANEL MEMBER LANDOLPH: Stick with carcinogenesis  
20 for a second. You know, for cancer, the cancer slope  
21 factors span about a factor of a million. So there are  
22 things like tamoxifen, which are reasonably weak. And  
23 then there are things like, oh, aflatoxin, for instance,  
24 which are incredibly strong. So it might be not that  
25 difficult to compile a list of these based on a cancer

1 slope factor to start out with, you know, to help  
2 prioritize these and then later on add the concentration  
3 to get the product.

4           The same thing for toxicity, you could get the  
5 things like dioxin, which have really high toxic slope  
6 factors, and then other things which are more prosaic and  
7 we might not have the time, or the energy, or the  
8 resources to regulate, because they're not that big a  
9 threat, and just kind of triage some of these things and  
10 move the important ones up to the top.

11           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

12 RUIZ: Yeah. Thanks. And, in general, you know, when  
13 OEHHA has developed cancer factors or other -- or RELs, we  
14 tend to look at those first. You know, so many of these  
15 substances have been in our list for a long time. So  
16 mainly what we are doing with now and in the near future  
17 will be emerging chemicals, I mean, things that we had not  
18 thought about yet.

19           You know, so this is all kind of going to be kind  
20 of out there, you know, kind of pushing the envelope of  
21 new chemicals that maybe should be added to the list.

22           CHAIRPERSON ANASTASIO: Okay. Thank you, Joe.  
23 Paul.

24           PANEL MEMBER BLANC: Just remind us is this --  
25 the list -- when you add new things, does it exclude or

1 not exclude agricultural chemicals?

2 AQPST TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

3 RUIZ: It does not exclude agricultural chemicals. So,  
4 for instance, if -- during production of pesticides, there  
5 are emissions at the facility, then those have to be  
6 reported. If after the use of a pesticide, there are  
7 emissions such as fumigation, you know, at a facility,  
8 when the fumigant is being vented to ambient air, then  
9 those are included in the -- in the list of activities  
10 that must be reported.

11 It's only when they are being used for their  
12 pesticidal use, you know, that they are excluded. So  
13 there is an exclusion in the statute that essentially --

14 PANEL MEMBER BLANC: Function --

15 AQPST TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

16 RUIZ: -- agricultural products being used, you know, for  
17 their agricultural intended use are not part of this  
18 program.

19 PANEL MEMBER BLANC: So I think that one  
20 challenge with the sources that we had recommended and  
21 then you were using before going ahead with adding on  
22 additional chemicals that are associated with emerging  
23 technologies and emerging industries is that the -- is  
24 the -- you know, the lag time before there's enough  
25 recognition or attention to them to filter down to some of



1 those lists. So you may want to consider an  
2 industry-specific strategy where you select certain  
3 high-impact industries that can be characterized by a lot  
4 of introduction of -- or potential introduction of new  
5 chemical materials.

6 So an example would be the battery industry as  
7 just one example, and I would say, you know, display  
8 terminals, and micro-electronics, and, you know, just a  
9 handful of industries that -- and -- you know, and also  
10 the urethane related things, where I'm not exactly sure  
11 what the best sources would be to catch these substances,  
12 other than trade journals where they tend to be talked  
13 about a bit.

14 So I don't have a simple fix, but if the emphasis  
15 is on emerging or industries that tend to be characterized  
16 by emerging new chemical moieties, then you should  
17 probably take an industry-specific choice. That's why I  
18 asked about ag chemicals, because things like herbicides  
19 that are being introduced with regularity, and flame  
20 retardants, and, you know, modifications of existing  
21 things are one approach, I suppose.

22 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
23 RUIZ: Yeah. So we do consult with Department of  
24 Pesticide Regulation staff as we do our updates to the  
25 list. But, yeah, that's a very good point. Thank you.

1 CHAIRPERSON ANASTASIO: Thank you, Paul.

2 You know, Gabe, on that note, I imagine you guys  
3 do annual literature searches through PubMed or other  
4 science to try to -- you know, searching for emerging  
5 contaminants or emerging air toxics. That's going to be  
6 probably faster turnaround than some of the handbooks.

7 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

8 RUIZ: Yeah, I think, one of the things -- that's  
9 definitely one of the things that we need to do. This  
10 time around we were being a little bit more reactive. I  
11 mean, so when we start working on the regulation, you  
12 know, we still -- it took us a while to figure out what  
13 the scope of the amendments needed to be.

14 Then by the time we kind of settled down on  
15 exactly how much we wanted to do, basically we just  
16 decided to play catch-up at that point. But I think going  
17 forward, yeah, taking a more proactive approach will be  
18 useful in, you know, keeping us up to date on what's going  
19 on out there.

20 CHAIRPERSON ANASTASIO: Yes, Mike.

21 PANEL MEMBER KLEINMAN: Yes. The -- some of the  
22 emerging industries, you know, as our technology, you  
23 know, changes, provide a lot of possibilities. For  
24 example, recycling of lithium batteries with our move to  
25 an electronic -- you know, electric vehicle

1 infrastructure, and more and more electric cars, et  
2 cetera. Recycling these newer batteries is going to lead  
3 to a lot of emissions of things that are not governed.

4 And I was noticing on -- in Appendix A, at least  
5 in Table A1, lithium wasn't listed. And lithium does have  
6 some toxicity and may become, you know, important in the  
7 future.

8 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
9 RUIZ: Okay. Thanks. We will like into that.

10 CHAIRPERSON ANASTASIO: Great.

11 Gabe, how about we move to the next slide. I  
12 believe you have five total questions?

13 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
14 RUIZ: Actually, there are only three questions, you know.  
15 So as we were --

16 CHAIRPERSON ANASTASIO: Oh, okay.

17 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
18 RUIZ: -- working on our presentation, we condensed a  
19 couple of them into one, but, yeah.

20 CHAIRPERSON ANASTASIO: Okay. So this is the  
21 last slide?

22 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
23 RUIZ: Yes.

24 CHAIRPERSON ANASTASIO: Okay.

25 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

1 RUIZ: Last question is -- so we added three functional  
2 groups PAHs, isocyanates, and halogenated PAHs. So the is  
3 does the panel have recommendations on other classes of  
4 functional groups that we should consider for addition in  
5 the next round of updates?

6 CHAIRPERSON ANASTASIO: I know we had given  
7 several suggestions for functional groups, some of which  
8 you adopted, some of which weren't feasible. But let's  
9 open it up again. So, Mike, thoughts?

10 PANEL MEMBER KLEINMAN: Yeah. This is not  
11 really -- well, it's kind of a functional group, but going  
12 back to the PFAS, PFOS, PFOA type compounds. They're all  
13 part of a huge family. But looking at the toxicology data  
14 that's emerging, it seems like the compounds in the range  
15 of seven carbons in the backbone up to, I think, eight  
16 or -- eight or nine tend to have the greatest amount of  
17 toxicity. And so there may be ways to group families of  
18 compounds by structure activity relationships. And that  
19 may be a way to deal with some of these things, where, for  
20 example, as you regulate one of the PFAS compounds, they  
21 add something to it and change it moderately. But it's --  
22 you know, it has the same say fire retardant capability,  
23 but it's no longer exactly the same as it was. So some  
24 structure activity relationships might be helpful.

25 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

1 RUIZ: Okay. Thank you.

2 CHAIRPERSON ANASTASIO: Thank you, Mike.

3 Any panel member have recommendations on another  
4 functional group classes?

5 I mean, Gabe -- I guess maybe this is a question  
6 for OEHHA, but, I mean, working out, how do you regulate a  
7 class is still a topic of a discussion, right, how that --  
8 how that's going to look?

9 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

10 RUIZ: Yes. Yes. So the function -- or, you know, the  
11 role of the Hot Spots Regulation is only to gather  
12 information of what is being emitted. So when it comes to  
13 additional regulation of specific substances, I mean,  
14 that's outside the scope of the AB 2588 program that we  
15 oversee. So, yeah, it would be up to -- you know, I mean,  
16 potentially one of our sister divisions that CARB might be  
17 coming up with ATCM, Air Toxic Control Measures. I mean,  
18 if we determine that, you know, there's some need to  
19 control a specific substance. But again, all of that is  
20 done really outside the scope of the EICG.

21 CHAIRPERSON ANASTASIO: Yes, I see. Thank you.

22 Anything else from the Panel about functional  
23 groups?

24 Karen.

25 PANEL MEMBER MESSER: Yeah. This is a little bit

1 outside my area of expertise, but just wanted to mention  
2 there are these chemometric -- following up on one of the  
3 prior comments from one of our panelists, that there are  
4 these chemometric classifiers that can classify chemical  
5 compounds. And those can be very useful, for example, in  
6 high throughput screening studies that I've participated  
7 in, like Merco classes or Tanimoto clusters. So just  
8 following up on that idea as a way of grouping these  
9 compounds that might help to prioritize classes of  
10 compounds.

11 CHAIRPERSON ANASTASIO: Yeah. Okay. Thank you.

12 Any other Panel comments on either this question  
13 or any of the other questions that Gabe has raised?

14 So I have one comment. I mean, we talk about  
15 prioritization and that's definitely important, but I've  
16 said this before, but I think it's an important point, so  
17 I want to say it again, you know, if we look at the 900  
18 new chemicals added to Appendix A, we can do -- we and  
19 OEHHA do roughly two to three chemicals a year.

20 So I don't think I'm going to make it for the  
21 whole list. So this idea of provisional health values is  
22 hugely important. And I think part of that -- you know, I  
23 wonder how much of setting values is going to be limited  
24 by the current requirement for animal or human data. And  
25 so I hope that within the provisional health values in

1 vitro assays can be used to come up with some initial  
2 estimate of whether something is high, medium, low  
3 toxicity.

4 And, John, I don't know, I know John Faust talked  
5 to us about provisional health values a year or so ago,  
6 but can we look forward to an update on the progress  
7 there?

8 DR. BUDROE: I'm hesitant to speak for another  
9 branch, as far as how they're going on that, but --

10 CHAIRPERSON ANASTASIO: Okay

11 DR. BUDROE: -- I mean the SNAPS Program, which  
12 is a oil and gas production monitoring study and risk  
13 assessment in communities near those facilities. They are  
14 essentially looking at surrogate values for risk  
15 assessment health guidance values. And some of them are,  
16 for example, using values from other programs and either  
17 U.S. EPA or other states. So that's progressing.

18 And there's a -- they're trying to work in things  
19 likes read-across as much as possible, but they're working  
20 with a lot smaller analyte list also. I mean, they're  
21 working with essentially VOCs that are detected near those  
22 communities. So the size of the list is a lot smaller  
23 than what is going to be going into the Appendix A list.

24 CHAIRPERSON ANASTASIO: Okay.

25 Yeah. I mean, we've got to figure out a way to

1 increase the throughput on at least rough health guidance  
2 values to have any chance of getting through this list.

3 Any other Panel comments?

4 Okay. So then what I'd like to do is I'm going  
5 to open it up to public comment. So if you would like to  
6 comment -- oh, sorry, Gabe, were you not done?

7 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

8 RUIZ: Oh, yeah. Well, I have just one final slide talk  
9 about --

10 CHAIRPERSON ANASTASIO: Sorry. Yes, go ahead.

11 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

12 RUIZ: Okay. Thank you. So we can go back to the next  
13 steps slide. There you go.

14 So as I mentioned, the regulatory package is  
15 being reviewed by the Office of Administrative Law. And  
16 we anticipate that the adopted amendments will become  
17 effective early next year. In the interim, we will be  
18 working on developing guidance material to assist  
19 facilities and air districts with implementation of the  
20 revised -- or of the amendments. We anticipate that we  
21 will get started on the five-year review and update cycle  
22 for chemicals -- for the chemicals list next year. And  
23 also make sure we will continue our discussions with OEHHA  
24 and the panel on provisional health values outside of the  
25 AB 2588 regulatory framework.



1           Yeah, next slide.

2                               --o0o--

3           AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

4 RUIZ: So that ends my presentation. This final slide  
5 provides updated contact information, in case anyone would  
6 like to follow up with further questions. So I really  
7 would like to thank you, Cort, and the Panel for all your  
8 value input through the review process. And we look  
9 toward to future discussions on this subject.

10           Thanks.

11           CHAIRPERSON ANASTASIO: Great. Thanks very much,  
12 Gabe. Appreciate your presentation today and all the work  
13 you've done to update Appendix A.

14           So now I'd like to open it up to public comment.  
15 So two ways to do this. I see that a number of people  
16 have already said something in chat. So I will read  
17 those. The other thing you can do is raise your hand.  
18 And then I'll call on you and you give your comment  
19 verbally. We will have a two-minute time limit on your  
20 comment, so try to be concise.

21           So I'm going to start by reading some of the  
22 comments in chat.

23           So Janet Whittick wrote that this is an issue of  
24 prioritization. So the question is, you know, what's the  
25 plan for how to prioritize technical evaluations for the

1 already listed chemicals. And we discussed this several  
2 times. So I'm just going to say that this is certainly  
3 something that CARB, and OEHHA, and the Panel are all  
4 aware of, that we really need to hit the most important  
5 chemicals first.

6           Moirra Sullivan had a comment that maybe exposure  
7 data should drive the prioritization process, and that  
8 certainly PFAS is Significant in that regard. And, you  
9 know, Joe had mentioned definitely as part of the  
10 prioritization that exposure is going to be an important  
11 component

12           Michael Miller writes that -- let's see this is  
13 related to the emission factors for chemicals already on  
14 the lists. Any ongoing reviews or plans to review/redo or  
15 address the allowed emissions factors from relevancy  
16 and/or accuracy. Many of the available emissions factors  
17 were derive from limited source test data from the 70s and  
18 80s when methods were in development and analytical  
19 instruments had poor detection limits. So in many cases,  
20 he believes the emissions factors were set based on those  
21 high detection limits and that can be issue when you have  
22 a lot of non-detects.

23           So maybe Gabe send this to you. I mean, my  
24 understanding is the emissions data is not typically that  
25 old. But can you talk to this issue of emissions factors?

## 1 AQPSD TOXICS INVENTORY &amp; SPECIAL PROJECTS MANAGER

2 RUIZ: Yes. I mean, I think I'll take a stab at it. So  
3 we have -- I mean, we have to rely on emissions data that  
4 is available. A lot of the methodologies, a lot of the --  
5 yeah, methods for estimating -- these emissions factors,  
6 sorry, actually are set by air districts. I mean, so  
7 between air districts and us to, a lesser extent, we do  
8 search, you know, the literature for the best available  
9 data. But, I mean, we're talking about, for instance,  
10 different processes, different materials, being used. So  
11 it's really hard to, you know, always have like cutting  
12 edge -- cutting edge studies on everything.

13 So the districts and us do our best to keep up  
14 with the permission that is out there. But the EICG  
15 actually does allow facilities to do source testing. I  
16 mean, so they're not -- there's a specific number of  
17 facilities that have to do source testing. But districts  
18 have the authority to, you know, implement more stringent  
19 requirements. And facilities can work with the district  
20 to do their own testing, you know, but they have to show  
21 essentially that their test is comparable, you know, to  
22 whatever emission -- what study was used to derive these  
23 emission factors.

24 So there's nothing precluding anyone from doing  
25 some testing that actually shows their emissions are

1 different from what the -- from what is published in those  
2 emission factors.

3 CHAIRPERSON ANASTASIO: I see. And so these  
4 emission factors are then used to estimate risks to the  
5 local population, based on the health guidance values?

6 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
7 RUIZ: Yes. Yes. That would be the process, so a  
8 facility develops an emission inventory. The district  
9 does an analysis of the emissions reported and then  
10 determines whether the facility has high enough  
11 emissions -- you know, a specific -- or chemicals that  
12 might drive the risk. And then they determine whether  
13 they need to move on into the next phase. So that's  
14 called the prioritization step.

15 And then the next step, these facilities that  
16 have a high prioritization score will have to actually  
17 conduct a health risk assessment, and a lot of times, the  
18 health risk assessment and prioritization scores. You  
19 know, the health risk assessment actually they look at  
20 very specific parameters, such as where are the emissions  
21 actually taking place, how far is the nearest receptor,  
22 what is the actual meteorology that impacts the emissions,  
23 you know, throughout the entire year.

24 Sometimes the HRA actually comes down or comes  
25 that way if, you know, the risks are not as high as, you

1 know, potent -- as they could potentially be if the  
2 conditions were different.

3 CHAIRPERSON ANASTASIO: I see. Okay. Thank you.

4 So Michael Miller who has this question I see  
5 he's actually online. Michael, can you -- do you want to  
6 clarify your comment or follow up?

7 MR. MILLER: All right. Can you -- can you hear  
8 me now?

9 CHAIRPERSON ANASTASIO: Yes.

10 MR. MILLER: Hello?

11 CHAIRPERSON ANASTASIO: Yes. Can you hear me?

12 MR. MILLER: It looks like I'm having some issues  
13 with the audio.

14 CHAIRPERSON ANASTASIO: Oh, shoot. Okay. Okay.  
15 You can't hear me. Michael, I will move on to the next  
16 comment and hopefully you can get your audio --

17 MR. MILLER: I can't speak, so I'm just going to  
18 get off the mic here.

19 Can you hear me now?

20 CHAIRPERSON ANASTASIO: Yes. Can you hear me?

21 MR. MILLER: All right. So the question I had  
22 actually goes with that -- the actual, you know, requiring  
23 of the sources. So when we go through the risk  
24 assessment, we were given a bunch of different factors  
25 like, you know, Long Beach factors AP-42. In many cases,

1 when you plug those factors into the risk assessment  
2 score, you get these arbitrarily high values, which it  
3 actually forces the source into doing a test. In the case  
4 of diesel fuel out of combustion source, the test is in  
5 the neighborhood of like 50,000 to have a tester come out  
6 and test for all the compounds.

7           And then when we went and researched these  
8 factors and found out that the factor was based off of,  
9 like I said, source test data from the 70s very limited,  
10 and it was a non-detect. And so it was an arbitrarily  
11 high value. And so it really screwed -- rather skewed the  
12 risk assessment really high. And it kind of forces every  
13 source in that category to do a source test. And so it  
14 would be very helpful, at some point, to start going  
15 through the -- maybe with the air boards and gather data  
16 on sources that did a source test in lieu of a using a  
17 factor. And then to look at those factors and maybe put  
18 some resources towards developing more modern or, you  
19 know, say better factors that categorize the -- what's  
20 actually coming out.

21           Since there is a lot of source test data right  
22 there. With the sources, you guys will have actually some  
23 pretty good source test data to use and that's my comment.

24           CHAIRPERSON ANASTASIO: Thank you, Michael.  
25           Gabe, any response?

1 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

2 RUIZ: Yeah. I mean, I think it's something that we  
3 definitely need to take offline. We do plan, you know, as  
4 part of the implementation of the amendments to the EICG  
5 and companion regulation, which is the criteria and toxics  
6 reporting reg, we do plan to, you know, have a number of  
7 working groups with local air districts through the  
8 California Association of -- California Air Pollution  
9 Control Officers Association, or CAPCOA. So I think  
10 that's probably a much better forum, you know, to bring up  
11 these issues.

12 Yeah, I think this is way too detailed and I  
13 don't have all the technical expertise that it would  
14 require to answer those questions. A lot of this work is  
15 really done by the air districts. And so we do work with  
16 them, you know, very closely, but it involves a lot of  
17 people with very specific technical expertise.

18 CHAIRPERSON ANASTASIO: I see. Thank you, Gabe.  
19 And thank you, Michael, for the comment.

20 The last comment I see is from Rita Loof. And  
21 Gabe, this is a question for you again. Is the list of  
22 110 compounds that was mentioned in addition to the 900  
23 compounds currently included in appendix A?

24 So I think maybe the question is can you go over  
25 the numbers again in terms of number of species that were

1 already in Appendix A and then the new ones you added?

2 AQPST TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

3 RUIZ: Yeah. So there were 450 chemicals roughly in the  
4 chemical list as it existed before the amendments. We  
5 added over 900 -- close to 1,000 new chemicals to Appendix  
6 A1 and that does include the 110 chemicals that I  
7 mentioned. So it includes all of the ACGIH chemicals, the  
8 NIOSH chemicals, PFAS. Everything that I mentioned during  
9 the presentation, that's part of the nearly 1,000  
10 chemicals that we added or the 900 plus chemicals that we  
11 added.

12 CHAIRPERSON ANASTASIO: Thank you, Gabe.

13 So I just have a follow-up question. Of the 450  
14 in the previous Appendix A list, do you know how many of  
15 those have health guidance values roughly?

16 AQPST TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

17 RUIZ: I just looked at that number. I'm sure it's -- I  
18 mean, it's a fraction, but it's close to half. I want to  
19 say --

20 CHAIRPERSON ANASTASIO: Close to half. Okay.

21 AQPST TOXICS INVENTORY & SPECIAL PROJECTS MANAGER

22 RUIZ: -- maybe about -- I mean, don't quote me, but I  
23 seem to recall like roughly 170 or so, but I would have to  
24 go back and check. But it's a pretty significant number.  
25 But then when you look at the total number in the new



1 list, then it becomes a much smaller fraction.

2 CHAIRPERSON ANASTASIO: Yeah. So that's  
3 interesting, right. So you're talking -- if you've got  
4 170 health guidance values out of roughly now 12 -- 1,300  
5 chemicals that we're talking, you know, 10, 15 percent of  
6 the species actually have health values.

7 AQPSD TOXICS INVENTORY & SPECIAL PROJECTS MANAGER  
8 RUIZ: Yeah. It's a very -- relatively a very small  
9 number altogether.

10 CHAIRPERSON ANASTASIO: Yeah. Any other comments  
11 from the Panel about our Appendix A discussion?

12 Okay. Seeing none. I'd like to thank Gabe for  
13 his presentation and all the work that he and CARB have  
14 done on updating the EICG.

15 The last topic on our agenda for today is  
16 administrative matters. First, I'd like to remind the  
17 Panel to make sure it's in your calendar. Our next  
18 meeting will be Thursday, May 12th, starting at 9:30.  
19 We'll probably run till 2:30, so we'll take a break for  
20 lunch on that day.

21 Also, Daryn reminded me through the chat that I  
22 really forgot to dispose of the 1-bromopropane discussion  
23 in terms of your next steps. So I would propose that  
24 since there were pretty minor comments overall that aren't  
25 going to affect the IUR that Daryn revises the document,

1 sends it to me with a CC to Ahmad and Karen, and then I'll  
2 look it over. And Ahmad and Karen, if you have any  
3 comments on that, then you can let me know and then I'll  
4 just tell Daryn otherwise that it looks good or not. And  
5 I am sure it will look good at that point. So and that's  
6 how we'll proceed on that.

7           The last topic is that I'm not sure if everybody  
8 knows this already, but today is Lori Miyasato's last day  
9 at CARB, and therefore with the SRP. So I wanted to thank  
10 you Lori for all of her help over the last two years and  
11 just say a little bit of information I got about Lori's  
12 service at CARB from her manager Hye-Youn park. So Lori  
13 has worked at CARB in the Research Division for almost 19  
14 years and then that includes the last two years with  
15 Liaison to SRP. She's been a staff lead for multiple  
16 important projects, such as the NAAQS review,  
17 neurotoxicity study, and ultra fine particle health  
18 research. She was also a lead staff to quantify health  
19 impacts of CARB regulations, such as the Carl Moyer Rule.

20           She's managed more than 16 research contracts,  
21 including wildfire smoke exposure in infant Macaques and  
22 immune respiratory impacts. That sounds like Lisa Miller  
23 to me. I don't know.

24           As a recognition of her hard work and dedication,  
25 she received three CARB Gold and Silver Superior

1 Accomplishment Awards. She also gave multiple Board  
2 presentations on neurotoxicity, and air pollution, and  
3 childhood respiratory allergies. She's a great scientist  
4 with excellent organizational skills and subject matter  
5 expertise. And she is also a genuinely nice person to  
6 work with that everyone at CARB and on the Panel will  
7 miss.

8           So Lori, thank you very much for your many years  
9 of service to CARB and to the SRP. We're sorry you're  
10 leaving us, but we're happy that you're really just moving  
11 next door to OEHHA, so we can take some solace in that.

12           You can now have a rebuttal Lori, if you'd like.

13           PANEL LIAISON MIYASATO: Thank you very much, Dr.  
14 Anastasio. It has been an honor to work with this Panel.  
15 It's only been two short years, but this has been a great  
16 experience and I've learned so much from you all, as well  
17 as from the program staff at OEHHA, and CARB, and DPR.  
18 It's really great to see the scientific review process in  
19 action. And it kind of restores my faith in science, if  
20 it has ever been off. So I just wanted to thank you. I  
21 think you're all great. You're all models. And this will  
22 help me as I move on in my career.

23           This has been one of my most rewarding  
24 assignments in my time at CARB. And so I really  
25 appreciate everything that you all do.

1 Thank you so much.

2 CHAIRPERSON ANASTASIO: That's great. Well,  
3 thank you, Lori.

4 It looks like Mike would like to say something.

5 PANEL MEMBER KLEINMAN: Yeah, I just wanted to  
6 add to what you just said. I've worked with Lori as a  
7 program manager. She managed some of my research over the  
8 years and has always been a remarkably helpful and  
9 thoughtful person to work with. Also she's had remarkably  
10 good insights into science and the application of neurotox  
11 to the kinds of studies that we've been doing. And she's  
12 often, you know, added a lot of value to the research  
13 project or products that we've generated over the years.  
14 So I wanted to thank you for that as well. And I'm really  
15 happy that you're staying engaged. And I think you  
16 deserve to have a wonderful experience in your new job.

17 And thank you.

18 PANEL LIAISON MIYASATO: Thank you so much, Dr.  
19 Kleinman. It's been great working with you. And I'm kind  
20 of sad to have to give up these contract projects that  
21 I've worked with you on. Thank you.

22 CHAIRPERSON ANASTASIO: Great. Thank you, Mike.

23 All right. Well, anyone else want to say  
24 anything about anything?

25 Okay. I'm then looking for a motion to adjourn.

1 PANEL MEMBER KLEINMAN: So moved.

2 PANEL MEMBER HAMMOND: Second.

3 CHAIRPERSON ANASTASIO: Thank you very much. I'm  
4 now looking for a vote on adjournment.

5 All in favor, you just raise your physical hand.

6 (Hands raised.)

7 CHAIRPERSON ANASTASIO: All right. We are  
8 unanimously done. Well, thank you very much everybody for  
9 your attendance today and your input. Appreciate that.  
10 Thank you to OEHHA and CARB staff for their presentations.  
11 And we will see you in May. And who knows, maybe it will  
12 actually be in person. We'll see how that goes.

13 All right. Have a good weekend, everyone.

14 (Thereupon the California Air Resources Board,  
15 Scientific Review Panel adjourned at 12:43 p.m.)

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CERTIFICATE OF REPORTER

I, JAMES F. PETERS, a Certified Shorthand Reporter of the State of California, do hereby certify:

That I am a disinterested person herein; that the foregoing California Air Resources Board, Scientific Review Panel meeting was reported in shorthand by me, James F. Peters, a Certified Shorthand Reporter of the State of California;

That the said proceedings was taken before me, in shorthand writing, and was thereafter transcribed, under my direction, by computer-assisted transcription.

I further certify that I am not of counsel or attorney for any of the parties to said meeting nor in any way interested in the outcome of said meeting.

IN WITNESS WHEREOF, I have hereunto set my hand this 25th day of October, 2020.



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