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Defining the Science of Occupational and Environmental Health®

January 31, 2017

Dr. Geert Boeije i2a Secretary General International Antimony Association (i2a) Avenue de Broqueville 12 1150 Brussels BELGIUM

Re: Antimony trioxide and Antimony and compounds

Dear Dr. Boeije,

## Antimony and compounds:

The ACGIH<sup>®</sup> Threshold Limit Values (TLV<sup>®</sup>) for Chemical Substances Committee has chosen to retain Antimony and compounds on their Under Study list for 2017. Please know that copies of your comments are on file and under Committee consideration. While under study, no draft *Documentation* is available for public review.

## Antimony trioxide:

The ACGIH<sup>®</sup> Board of Directors voted to place Antimony trioxide on the 2017 Notice of Intended Change (NIC). The proposed recommendation is a TLV<sup>®</sup>–TWA of 0.03 mg/m<sup>3</sup>, Respirable particulate matter, with an A3, Confirmed Animal Carcinogen with Unknown Relevance to Humans, carcinogenicity notation.

Attached you will find a copy of the 2017 NIC draft *Documentation* for Antimony trioxide for your personal use and review. We welcome further input in response to your review of the NIC draft *Documentation*. Your input is valued by ACGIH<sup>®</sup> and will be carefully considered during the TLV<sup>®</sup>/BEI<sup>®</sup> Development Process. The draft *Documentation* will also be available to the public on our website at <u>http://www.acgih.org/store</u>.

As general practice, ACGIH<sup>®</sup> reviews all submissions regarding chemical substances and physical agents on the Under Study list, as well as NICs or Notice of Intent to Establish (NIEs), or currently adopted  $TLV(s)^{\text{®}}$  and  $BEI(s)^{\text{®}}$ . The comment period for an NIC or NIE draft *Documentation* and its respective  $TLV(s)^{\text{®}}$ , notation(s) or  $BEI(s)^{\text{®}}$  will be limited to a firm four-month period, running from February 1 to May 31 of each year.

ACGIH<sup>®</sup> has structured the comment period to ensure that all comments are received in time for full consideration by the appropriate committee before its fall meeting. Because of the time required to properly review, evaluate, and consider comments during the fall meetings, any comments received after the deadline of May 31 may not be considered in that year's deliberations regarding the outcome for possible adoption of a NIC or NIE. All comments received after the May 31 deadline will be fully considered in the following year. All draft *Documentation* will be available for public review and comment during the full four-month period.

When submitting comments, ACGIH<sup>®</sup> requires that the submission be limited to 10 pages in length, including an executive summary. The submission may include appendices of citable material not included as part of the 10-page limit. It would be very beneficial to structure comments as follows:

- 1. Executive Summary Provide an Executive Summary with a limit of 250 words.
- 2. List of Recommendations/Actions Identify, in a vertical list, specific recommendations/actions that are being requested.
- 3. Rationale Provide specific rationale to justify each recommendation/action requested.
- 4. Citable Material Provide citable material to substantiate the rationale. Citable material is data that is available in the public domain or that we have written authorization from the owner to use. Should submitted material include unpublished data, it is important for this written authorization to accompany the submission and it must grant ACGIH<sup>®</sup> permission to use, cite, and release the data. Please refer to our website at <u>http://www.acgih.org/TLV/DevProcess.htm</u> for instructions on how to complete this permission statement

For complete information regarding the TLV<sup>®</sup>/BEI<sup>®</sup> Development Process, please visit our website (http://www.acgih.org).

Thank you for your participation in the TLV<sup>®</sup>/BEI<sup>®</sup> Development Process.

Regards,

Ruga Rathi

Ryan Peltier, REHS/RS Science and Education Manager ACGIH<sup>®</sup>

Junua Budes

Jessica Bender Science and Education Coordinator ACGIH<sup>®</sup>

Attachment(s): Antimony trioxide 2017 NIC draft Documentation