Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
1001 I Street • P.O. Box 2815 • Sacramento, California 95812 • www.arb.ca.gov

Gray Davis
Governor

June 11, 2001

Dear Sir or Madam:

Request for Information Regarding Environmental Tobacco Smoke

I am writing to request information on the atmospheric chemistry, sources, total exposure to, and the adverse health effects of exposure to environmental tobacco smoke (ETS). The Air Resources Board (ARB) is requesting this information as part of our toxic air contaminant program. This request is the first step in the process to review and assess ETS as a toxic air contaminant. This program is established by state law (California Health and Safety Code section 39650 et seq.) and is summarized in Enclosure 1.

In February 1992, the ARB and the Office of Environmental Health Hazard Assessment (OEHHA), with assistance from the Department of Health Services (DHS), undertook a thorough assessment of the health risks associated with exposure to ETS. This assessment was done to ensure a comprehensive review of scientific data, to obtain public input through public comment periods and workshops, and to secure an independent review by the state's mandated scientific peer group, the Scientific Review Panel (SRP). In June 1997, the SRP approved a scientific report that presented the assessment performed jointly by OEHHA, DHS, and the ARB. The SRP also developed specific findings regarding the health effects resulting from exposure to ETS. The final report was released to the public in September 1997, and was approved by the ARB at its October 23, 1997 meeting. However, since 1997, new legislation has been enacted which requires an evaluation of the effects of candidate toxic air contaminants (i.e. ETS) on children's health.

Under the Children's Environmental Health Protection Act (Health & Safety Code section 39660(c)(1)(A)-(D)), the report prepared to identify a compound as a toxic air contaminant must now include the following (to the extent information is available):

1. exposure patterns among infants and children that are likely to result in disproportionately high exposure to ambient air pollutants in comparison to the general population;

2. special susceptibility of infants and children to ambient air pollution in comparison to the general population;
3. the effects on infants and children of exposure to toxic air contaminants and other substances that have a common mechanism of toxicity; and
4. the interaction of multiple air pollutants on infants and children, including the interaction between criteria air pollutants and toxic air contaminants.

Some of the work to update the previous ETS report will focus on meeting these new requirements. In addition, the OEHHA must conduct a quantitative risk assessment. In cases where there is no threshold of significant adverse health effects, existing law requires that OEHHA determine the range of risk to humans resulting from current or anticipated exposure to the substance. A range of risk was not calculated or presented in the previous ETS report.

We now request additional, pertinent information for ETS exposure, including any material on children's exposure to ETS and any material that may not be available to the public or that is not included in the enclosed bibliography from the joint ARB/OEHHA 1997 report on ETS (Enclosure 2). We are also requesting information relevant to human exposure to ETS and its constituents in California through media other than outdoor ambient air. Specifically, we are requesting information concerning total exposure to ETS through inhalation, ingestion, and skin absorption, with special emphasis on inhalation exposure in the indoor air environment. This includes ETS and its constituent concentrations in various media, consumption information, bioabsorption rates, body burden studies, etc.

There is no need to submit information that you submitted in response to ARB's previous requests for information about ETS. The information that you provide will be considered as part of an evaluation of ETS as a candidate toxic air contaminant. This information, with the exception of trade secrets, may be released to the public. Therefore, if you believe that any of the information you are providing is a trade secret, or is otherwise exempt from disclosure under any other provisions of law, you should identify it as such at the time of submission. The ARB's procedure for handling information claimed to be trade secret is explained in Enclosure 3.

We would appreciate receiving by September 4, 2001, any relevant information you wish to submit. Your help in carrying out our review is greatly appreciated. Please send the information to the attention of:

Ms. Janette Brooks, Chief
Air Quality Measures Branch
Re: Environmental Tobacco Smoke
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

If you are not the person to whom this request should be addressed, please forward it to the appropriate person in your organization. Also, please let us know whether you would like to continue to receive information inquiries for other candidate substances, and if not, if there is anyone in your organization to whom such requests should be sent. For other questions regarding the public information request, please contact Mr. Jim M. Aguila, Manager, Substance Evaluation Section, at (916) 322-8283.

Sincerely,

Peter D. Venturini, Chief
Stationary Source Division

Enclosures

cc: Scientific Review Panel on Toxic Air Contaminants
California Air Pollution Control Officers
Joan Denton, Ph.D., Director, Office of Environmental Health Hazard Assessment
Paul Helliker, Director, Department of Pesticide Regulation
Jack Broadbent, Air Division, United States Environmental Protection Agency, Region 9