

**Informal Comments of the National Institute for Occupational Safety and Health on the
Draft *Toxicological Review of 1,2,4- and 1,3,5-Trimethylbenzene*
for Interagency Science Consultation
February 2, 2012**

The National Institute for Occupational Safety and Health (NIOSH) reviewed a portion of Table 2 (“Other Agency and International Assessments”) in the U.S. Environmental Protection Agency (EPA) January 2012 Interagency Science Consultation draft *Toxicological Review of 1,2,4-Trimethylbenzene and 1,3,5-Trimethylbenzene* prepared in support of summary information on the Integrated Risk Information System (IRIS). Other parts of the draft were not reviewed.

Comments about Table 2 (page 21):

- 1) change agency name to “National Institute for Occupational Safety and Health”.
- 2) the “Inhalation Value” row for NIOSH states “reference not provided” with regard to the study that provided the basis for the NIOSH Recommended Exposure Limit (REL). The draft review cites “NIOSH 1992” as the source. The historical basis for the REL is NIOSH testimony to the Occupational Safety and Health Administration (OSHA) on OSHA’s proposed rule on Air Contaminants, presented at the OSHA informal public hearing August 1, 1988 [NIOSH1988]. NIOSH concurred with the PEL proposed by OSHA for trimethylbenzene (CAS 25551-13-7). OSHA cited a study published in 1957 by Battig, Grandjean, and Turrian <http://www.cdc.gov/niosh/pel88/25551-13.html>]. The EPA draft cites and provides a link to Battig et al. 1956, very likely the same work. The NIOSH RELs for 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene are in the NIOSH Pocket Guide to chemical hazards (NPG): <http://www.cdc.gov/niosh/pel88/25551-13.html> Because it provides a separate entry for each of those isomers, it may be preferable to cite the NPG in addition to NIOSH 1992 (i.e., NIOSH Recommendations for Occupational Safety and Health: compendium of policy documents and statements.)
- 3) Suggest adding international limits for European countries (only United States and Ontario limits are listed in Table 2.)

References

NIOSH [1988]. Testimony of the National Institute for Occupational Safety and Health on the Occupational Safety and Health Administration's proposed rule on air contaminants, 29 CFR Part 1910, OSHA Docket No. H-020. Presented at the OSHA informal public hearing, August 1, 1988. NIOSH policy statements. Cincinnati, OH: U.S. Department of Health and Human Services, Public Health Service, Centers for Disease Control, National Institute for Occupational Safety and Health.