

ALUMINUM COMPANY OF AMERICA
ALCOA BUILDING
PITTSBURGH, PENNSYLVANIA 15219



GARY REICH
CT FILM
1701 FIRST AVENUE
CHIPPEWA FALLS, WI 54729

1993 June 1

Dear Mr. Reich,

Per your request I am sending you information on the pending repeal of the food and drug "safe harbor" provided by section 12713 of Proposition 65. This section exempts food, drugs, cosmetics and medical devices which comply with FDA standards from warning requirements of the Prop 65 law.

The California EPA has agreed to repeal the above referenced section by July 1, 1993. In order to assure continued compliance with Prop 65 without including warning labels on our food packaging products, we request that our suppliers provide us written assurance that the affected materials we purchase from them will not require labeling. This can be accomplished by a statement indicating that: 1. there are no listed materials present in the products we purchase; 2. your product does not require labeling under California Proposition 65; or, 3. providing us with the concentrations of listed materials present or believed to be present in your products. If listed materials are present, we need to know the level(s) so that a risk assessment can be conducted to determine if potential exposures to consumers would require warning labels.

For your convenience, I have attached a copy of a 1992 document listing No Significant Effect Levels, against which risk assessments are compared.

I trust this information is sufficient to meet your needs.

R. W. BARR

cc: D. Arruda, ATC - A
E. M. Smith, ATC - A
R. M. James, Pittsburgh
J. F. Duderstadt, Pittsburgh

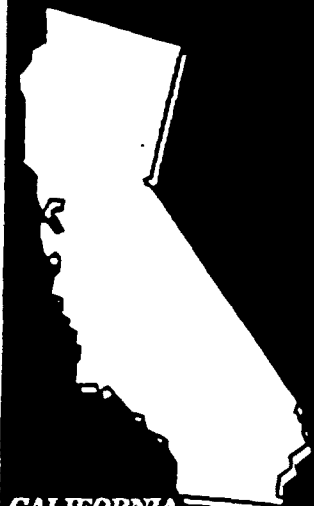
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PLAINTIFF'S
EXHIBIT
AL-1356

**SAFE DRINKING WATER &
TOXIC ENFORCEMENT
ACT OF 1986
(Prop. 65)**

No Significant Risk Levels
for Carcinogens
Acceptable Intake Levels
for Reproductive Toxicants

(Status Report)



**CALIFORNIA
ENVIRONMENTAL
PROTECTION AGENCY**

OEHHA
OFFICE OF ENVIRONMENTAL
HEALTH HAZARD ASSESSMENT

July 1992

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Note to Reader: The following table is a compilation of daily intake levels calculated for purposes of the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), and includes levels which have been formally adopted into regulation as well as levels that are in various stages of the adoption process (see "Status" column). This table will be updated on a regular basis.

Levels adopted into regulation (Title 22, California Code of Regulations, Sections 12705, 12709 and 12711 for carcinogens, and Section 12805 for reproductive toxicants) are intended to provide "safe harbors" for persons subject to the Act, and do not preclude the use of an alternative level that can be demonstrated by its user as being scientifically valid. Levels established under Section 12711 are based on cancer potency estimates taken from existing State or federal risk assessments. Levels established under Section 12709 are intended to be used only when the chemical in question is present as a "trace element". Levels established under Section 12705 -- which supercede levels in Sections 12711 and 12709 -- are based on *de novo* risk assessments or reviews of State or federal risk assessments conducted by the Office of Environmental Health Hazard Assessment (OEHHHA) pursuant to the guidelines set forth in Section 12703. These risk assessments are presented to the Scientific Advisory Panel for review and comment prior to their use as the basis for proposed regulatory numbers. The levels for reproductive toxicants in Section 12805 represent the no observable effect level divided by a 1,000-fold safety factor. Adoption of a regulatory level is carried out following the provisions of the Administrative Procedure Act.

OEHHHA has issued a proposed rulemaking to amend Section 12705 to establish a three-tiered hierarchy of no significant risk levels, as follows: (1) levels based on *de novo* risk assessments conducted by OEHHHA or based on State or federal risk assessments reviewed by OEHHHA; (2) levels based on State or federal risk assessments; and (3) levels based on default risk assessment procedures. Levels based on State or federal risk assessments which currently exist in Section 12711 will be adopted in Section 12705. Levels which were calculated using default risk assessment procedures (see "Expedited Cancer Potency Values and Proposed Regulatory Levels for Certain Proposition 65 Carcinogens," April 1992) for 140 chemicals will be also be adopted. A public hearing on this proposal is scheduled for July 17, 1992. Written comments on the proposed regulation are due on the same date. For ease of reference, levels that have been adopted or that have been proposed for adoption under a separate rulemaking in Section 12711 are still identified as adopted or proposed for adoption in Section 12711. Levels which were calculated using the "expedited," default procedures are identified as "P/12705d".

Carcinogen	Level (µg/d)	Status ^a
A-alpha-C (2-Amino-9H-pyrido[2,3-b]indole)	2	P/12705d
Acetaldehyde	90	A/12711
Acetamide	10	P/12705d
2-Acetylaminofluorene	0.2	P/12705d
Acrylamide	0.2	A/12711
Acrylonitrile	0.7	A/12705
Actinomycin D	0.00008	P/12705d

a. See last page for legend.

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Carcinogen	Level (µg/d)	Status
AF-2; [2-(2-furyl)-3(5-nitro-2-furyl)acrylamide]	3	P/12705d
Aflatoxins	0.014 ^b	RA/SAP
Aldrin	0.04	A/12705
Allyl chloride	30	A/12711
2-Aminoanthraquinone	20	P/12705d
o-Aminoazotoluene	0.2	P/12705d
4-Aminobiphenyl	0.03	P/12705d
3-Amino-9-ethylcarbazole hydrochloride	9	P/12705d
1-Amino-2-methylantraquinone	5	P/12705d
2-Amino-5-(5-nitro-2-furyl)-1,3,4-thiadiazole	0.04	P/12705d
Amitrole	0.7	P/12705d
Aniline	100	A/12711
o-Anisidine	5	P/12705d
o-Anisidine hydrochloride	7	P/12705d
Aramite	20	P/12705d
Arsenic	<i>as of 10/1/82 0.016 (inh)</i> 0.06 (inh)	P/12705
	10	A/12709
Asbestos	100 fibers ^c /d (inh)	A/12705
Auramine	0.8	P/12705d
Azaserine	0.06	P/12705d
Azathioprine	0.4	P/12705d
Azobenzene	6	A/12711
Benzene	7	A/12705
Benzidine	0.001	A/12705
Benzo[a]pyrene	0.06	A/12711
Benzofuran	1	RA/nSAP
Benzyl chloride	4	P/12711
Benzyl violet 4B	30	P/12705d
Beryllium	0.1	A/12709
Beryllium oxide	0.1	A/12711
Beryllium sulfate	0.0002	A/12711
Bis(2-chloroethyl)ether	0.3	A/12705
Bis(chloromethyl)ether	0.02	A/12705
Bromodichloromethane	5	P/12711
1,3-Butadiene	0.4	A/12711
Butylated hydroxyanisole	4000~	A P/12705
beta-Butyrolactone	0.7	P/12705d
Cadmium	0.05 (inh)	A P/12705
	1	A/12709
Carbon tetrachloride	5	A/12705
Captafol	5	P/12705d
Captan	300	P/12705d

b. Document undergoing revision; level will change to 0.02 µg/d.

c. Fibers equal to or greater than 5 micrometers in length and 0.3 micrometers in width, with a length/width ratio greater than or equal to 3:1 as measured by phase contrast microscopy.

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Carcinogen	Level (µg/d)	Status
Chlorambucil	0.002	P/12705d
Chlordane	0.5	A/12711
Chlordecone (Kepone)	0.04	P/12705d
Chlorendic acid	8	P/12705d
Chlorinated paraffins	8	P/12705d
Chlorodibromomethane	7	P/12705d
Chloroethane (Ethyl chloride)	200	RA/nSAP
Chloroform	9	A/12711
	20 (oral)	RA/nSAP
	40 (inh)	RA/nSAP
Chloromethyl methyl ether (technical grade)	0.3	P/12705d
3-Chloro-2-methylpropene	5	P/12705d
4-Chloro-ortho-phenylenediamine	40	P/12705d
Chlorothalonil	200	P/12705d
p-Chloro-ortho-toluidine	3	P/12705d
Chlorozotocin	0.003	P/12705d
Chromium (hexavalent)	0.001	A/12711
	0.001 (inh)✓	P/12705
C.I. Basic Red 9 monohydrochloride	3	P/12705d
Cinnamyl anthranilate	200	P/12705d
Coke oven emissions	0.3	A/12711
p-Cresidine	5	P/12705d
Cupferron	3	P/12705d
Cyclophosphamide (anhydrous)	1	P/12705d
Cyclophosphamide (hydrated)	1	P/12705d
D&C Red No. 9	100	P/12705d
Dacarbazine	0.01	P/12705d
Daminozide	40	P/12705d
Dantron (Chrysazin; 1,8-Dihydroxyanthraquinone)	9	P/12705d
DDT, DDE, DDD (in combination)	2	A/12705
DDVP (Dichlorvos)	2	A/12711
2,4-Diaminoanisole	30	P/12705d
2,4-Diaminoanisole sulfate	50	P/12705d
4,4'-Diaminodiphenyl ether (4,4'-Oxydianiline)	5	P/12705d
2,4-Diaminotoluene	0.2	P/12705d
Dibenz[a,h]anthracene	0.2	P/12705d
Dibromochloropropane	0.1	A/12705
p-Dichlorobenzene	20	A/12705
3,3'-Dichlorobenzidine	0.6	A/12705
1,1-Dichloroethane	100	P/12705d
1,2-Dichloroethane (Ethylene dichloride)	10	A/12705
Dichloromethane (Methylene chloride)	50	A/12711
	200 (inh)✓	A/12705
Dieldrin	0.04	A/12705
Di(2-ethylhexyl)phthalate	80	A/12711
Diethylstilbesterol	0.002	P/12705d
Diglycidyl resorcinol ether (DGRE)	0.4	P/12705d
Dihydrosafrole	20	P/12705d

Carcinogen	Level (µg/d)	Status
Dimethyl sulfate	0.05	RA/nSAP
4-Dimethylaminoazobenzene	0.2	P/12705d
trans-2-[(Dimethylamino)methylimino]-5-[2-(5-nitro-2-furyl)vinyl]-1,3,4-oxadiazole	2	P/12705d
7,12-Dimethylbenz(a)anthracene	0.003	P/12705d
Dimethylcarbamy l chloride	0.05	P/12705d
1,1-Dimethylhydrazine	In progress	Fall/92
1,2-Dimethylhydrazine	0.001	P/12705d
Dimethylvinylchloride	20	P/12705d
2,4-Dinitrotoluene	2	A/12711
1,4-Dioxane	30	A/12705
Direct Black 38 (technical grade)	0.09	P/12705d
Direct Blue 6 (technical grade)	0.09	P/12705d
Direct Brown 95 (technical grade)	0.1	P/12705d
Disperse Blue 1	200	P/12705d
Epichlorohydrin	9	A/12705
Estradiol 17	0.02	P/12705d
Ethyl-4,4'-dichlorobenzilate (Chlorobenzilate)	7	P/12705d
Ethylene dibromide	0.2 (oral)	A/12705
	3 (inh)	A/12705
Ethylene oxide (carcinogen)	2	A/12705
Ethylene thiourea	20	P/12705d
Ethyleneimine	0.01	P/12705d
Folpet	200	A/12711
Formaldehyde (gas)	15	A/12711
2-(2-Formylhydrazino)-4-(5-nitro-2-furyl)thiazole	0.3	P/12705d
Furmecyclox	20	A/12711
Glu-P-1 (2-Amino-6-methyldipyrido[1,2-a:3',2'-d]-imidazole	0.1	P/12705d
Glu-P-2 (2-Aminodipyrido[1,2-a:3',2'-d]-imidazole)	0.5	P/12705d
Glycidol	In progress	Fall/92
Griseofulvin	In progress	Fall/92
Gyromitrin (Acetaldehyde methylformylhydrazone)	0.07	P/12705d
HC Blue 1	10	P/12705d
Heptachlor	0.2	A/12711
Heptachlor epoxide	0.08	A/12711
Hexachlorobenzene	0.4	A/12705
Hexachlorocyclohexane		
alpha isomer	0.3	A/12711
beta isomer	0.5	A/12711
gamma isomer	0.6	A/12711
technical grade	0.2	A/12705
Hexachlorodibenzodioxin	0.0002	A P/12705
Hexachloroethane	20	P/12705d
Hexamethylphosphoramide	In progress	Fall/92

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Carcinogen	Level (µg/d)	Status
Hydrazine	0.04	A/12711
Hydrazine sulfate	0.2	A/12711
Hydrazobenzene (1,2-Diphenylhydrazine)	0.8	P/12705d
IQ (2-Amino-3-methylimidazo[4,5-f]quinoline)	0.5	P/12705d
Lasiocarpine	0.09	P/12705d
Lead acetate	3	P/12705d
Lead subacetate	20	P/12705d
Me-A-alpha-C (2-Amino-3-methyl-9H-pyrido- [2,3-b]indole	0.6	P/12705d
Melphalan	0.005	P/12705d
2-Methylaziridine (Propyleneimine)	0.03	RA/nSAP
3-Methylcholanthrene	0.03	P/12705d
4,4'-Methylene bis(2-chloroaniline)	0.5	P/12705d
4,4'-Methylene bis(N,N-dimethyl)benzeneamine	20	A/12711
4,4'-Methylene bis(2-methylaniline)	0.8	P/12705d
4,4'-Methylenedianiline	0.4	P/12705d
4,4'-Methylenedianiline dihydrochloride	0.6	P/12705d
Methyl methanesulfonate	7	P/12705d
2-Methyl-1-nitroanthraquinone (of uncertain purity)	0.2	P/12705d
N-Methyl-N'-nitro-N-nitrosoguanidine	0.08	P/12705d
N-Methylolacrylamide	2	RA/nSAP
Methylthiouracil	2	P/12705d
Metronidazole	In progress	Fall/92
Michler's ketone	0.8	P/12705d
Mirex	0.04	P/12705d
Mitomycin C	0.00009	P/12705d
Monocrataline	0.07	P/12705d
2-Naphthylamine	0.4	P/12705d
Nickel refinery dust	0.8	A/12711
Nickel subsulfide	0.4	A/12711
Nitrilotriacetic acid	100	P/12705d
Nitrilotriacetic acid, trisodium salt monohydrate	70	P/12705d
5-Nitroacenaphthene	6	P/12705d
5-Nitro-o-anisidine	10	P/12705d
Nitrofen (technical grade)	9	P/12705d
Nitrofurazone	0.5	P/12705d
1-[(5-Nitrofurfurylidene)-amino]-2-imidazolidinone	0.4	P/12705d
N-[4-(5-Nitro-2-furyl)-2-thiazolyl]acetamide	0.5	P/12705d
N-Nitroso-n-dibutylamine	0.06	A/12705
p-Nitrosodiphenylamine	30	P/12705d
N-Nitrosodiethanolamine	0.3	A/12711
N-Nitrosodiethylamine	0.02	A/12705
N-Nitroso-N-ethylurea	0.03	A/12705
N-Nitrosodimethylamine	0.04	A/12705
N-Nitrosodiphenylamine	80	A/12705

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Carcinogen	Level (µg/d)	Status
N-Nitrosodipropylamine	0.1	A/12705
N-Nitrosomethylethylamine	0.03	A/12711
N-Nitroso-N-methylurea	0.006	A/12705
N-Nitroso-N-methylurethane	0.006	P/12705d
N-Nitrosomorpholine	0.1	P/12705d
N-Nitrosomornicotine	0.5	P/12705d
N-Nitrosopiperidine	0.07	P/12705d
N-Nitrosopyrrolidine	0.3	A/12711
Ochratoxin A	In progress	Fall/92
Pentachlorophenol	40	A/12711
Phenacetin	300	P/12705d
Phenazopyridine	4	P/12705d
Phenazopyridine hydrochloride	5	P/12705d
Phenesterin	0.005	P/12705d
Phenobarbital	2	P/12705d
Phenoxybenzamine	0.2	P/12705d
Phenoxybenzamine hydrochloride	0.3	P/12705d
Phenyl glycidyl ether	5	RA/nSAP
o-Phenylphenate, sodium	200	P/12705d
Polybrominated biphenyls	0.02	A/12705
Polychlorinated biphenyls	0.09	A/12711
Polychlorinated biphenyls (≥ 60% chlorine by weight)	0.1	RA/SAP
Ponceau MX	200	P/12705d
Ponceau 3R	40	P/12705d
Potassium bromate	1	P/12705d
Pfocarbazine	0.05	P/12705d
Procarbazine hydrochloride	0.06	P/12705d
1,3-Propane sultone	0.3	P/12705d
beta-Propiolactone	0.05	P/12705d
Propylthiouracil	0.7	P/12705d
Reserpine	0.06	P/12705d
Safrole	3	P/12705d
Selenium sulfide	9	RA/nSAP
Sterigmatocystin	0.02	P/12705d
Streptozotocin	0.006	P/12705d
Styrene oxide	4	P/12705d
Sulfallate	4	P/12705d
Tetrachlorodibenzo-p-dioxin (2,3,7,8)	0.000005	A/12711
	0.000005	4 P/12705
1,1,2,2-Tetrachloroethane	3	P/12705d
Tetrachloroethylene	14	A/12711
Tetranitromethane	0.06	RA/nSAP
Thioacetamide	0.1	P/12705d
4,4'-Thiodianiline	0.05	P/12705d

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Carcinogen	Level (µg/d)	Status
Thiourea	10	P/12705d
Toluene diisocyanate	20	P/12705d
ortho-Toluidine	4	P/12705d
ortho-Toluidine hydrochloride	5	P/12705d
Toxaphene	0.6	A/12705
Trichloroethylene	60	A/12711
	50 (oral)	4 P/12705
	80 (inh)	4 P/12705
2,4,6-Trichlorophenol	10	A/12705
Tris(1-aziridinyl)phosphine sulfide (Thiotepa)	0.06	P/12705d
Tris(2,3-dibromopropyl)phosphate	0.3	P/12705d
Trp-P-1 (Tryptophan-P-1)	0.03	P/12705d
Trp-P-2 (Tryptophan-P-2)	0.2	P/12705d
Urethane (Ethyl carbamate)	0.7	A/12705
Vinyl bromide	In progress	Fall/92
Vinyl chloride	0.3	A/12711
	3 (inh)	P/12705
Vinyl trichloride (1,1,2-Trichloroethane)	10	P/12705d
2,6-Xylidine	100	RA/nSAP

Reproductive Toxicant	Level (µg/d)	Status
Ethylene oxide (reproductive toxicant)	20	A/12805
Lead (reproductive toxicant)	0.5	A/12805
Toluene	7000	A/12805

Legend:

A/12705 - Adopted in Section 12705

A/12709 - Adopted in Section 12709

A/12711 - Adopted in Section 12711

A/12805 - Adopted in Section 12805

Fall/92 - To be completed by the fall, 1992

P/12705 - Proposed for adoption in Section 12705

P/12705d - Proposed for adoption in Section 12705(d). Based on an expedited risk assessment. See "Expedited Cancer Potency Estimates and Proposed Regulatory Levels for Certain Proposition 65 Carcinogens" (April 1992)

P/12711 - Proposed for adoption in Section 12711

P/12805 - Proposed for adoption in Section 12805

RA/nSAP - OEHHA risk assessment completed, but has not been presented to the Scientific Advisory Panel for review

RA/SAP - OEHHA risk assessment completed and reviewed by Scientific Advisory Panel

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