



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

January 16, 1980

OFFICE OF THE  
ADMINISTRATOR

Dr. Lester Grant  
Environmental Criteria Assessment Office  
U.S. Environmental Protection Agency  
Research Triangle Park, North Carolina 27711

Dear Dr. Grant:

This is in response to your request for clarification of the views of the Science Advisory Board's Subcommittee on Arsenic as a Hazardous Air Pollutant with respect to "listing" arsenic as a hazardous air pollutant as a consequence of the Environmental Protection Agency's new airborne carcinogen policy.

The Subcommittee is aware that the decision to "list" or "not list" a hazardous air pollutant is not legally dependent on recourse to scientific documentation. The Subcommittee is also aware of the decision concept in the airborne carcinogen policy that evidence of carcinogenicity of a substance from exposure to that substance in any medium (air, water, food, etc.) may trigger a decision to "list."

The Subcommittee has concluded in its past reports that under a number of exposure conditions, especially in the occupation setting, that there is an established association between exposure to arsenic and development of cancer, both lung and skin cancer. Thus, the Subcommittee concludes that a decision to "list" arsenic as a hazardous air pollutant under the new airborne carcinogen policy is consistent with and supported by past documentation reviewed by the Subcommittee.

For the Subcommittee,

Sincerely yours,

A handwritten signature in cursive script that reads "Ruth R. Levine".

Ruth R. Levine, Ph.D.  
Chairman of the Subcommittee

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