The Office of Environmental Health Hazard Assessment (OEHHA) has scheduled for August 1 a public workshop for comments on a Draft Interpretive Guideline For Hand-To-Mouth Transfer Of Lead Exposure From Fishing Tackle Products.

The workshop is in response to a 2004 request to the agency from the Sport Fishing Coalition for guidance on calculating hand-to-mouth transfer of lead exposure resulting from the handling of fishing tackle products during recreational use.

The Sports Fishing Coalition submitted a request for a Safe Use Determination (SUD) and Interpretative Guideline for a hand-to-mouth transfer factor for lead in July of 2004, shortly after regulations concerning the way Proposition 65 exposure assessments should be conducted were changed where the exposure results from handling a consumer product.

The lead transfer factor in the request is confined to lead transferred from hand-to-mouth where fishing tackle products containing lead have been handled. The materials at issue in the SUD are substrates containing polyvinyl chloride (PVC), plastics, painted surfaces, and metal alloy surfaces.

In its petition, the Sports Fishing Coalition emphasized that there were no state approved methodologies for performing exposure assessments for background lead in consumer products such as fishing tackle, nor were there any “verified protocols for evaluating exposures to lead via the ingestion pathway from consumer products where the exposure is caused by handling the product and subsequently putting hands or foods in the mouth.”

Carol Brophy, a partner with the San Francisco law firm Nosaman, Guthner, Knox & Elliott, who represents the Sports Fishing Coalition, believes that an interpretative guideline would “avoid ‘over-warning.’” In a letter to George Alexeiff, OEHHA’s Deputy Director of Scientific Affairs, dated July 21, 2004, Brophy argued that a new methodology, formula or other easily applied transfer factors, would “enable the regulated community to evaluate ‘indirect’ exposures by the ingestion pathway – where the exposure travels from the surface of a consumer product to the mouth by transferring one or more times to a series of objects.”

Since the original request, OEHHA withdrew the application for a SUD and proceeded to work on an interpretive guideline for fishing tackle products. The agency released a draft of the document on May 30, 2007.

The Draft Interpretive Guideline examines the various ways users of the products can transfer lead from the products to their mouths. Among the methods of exposure examined include hand to cigarette to mouth, and hand to food to mouth. The agency also calculated that in some instances, individuals might handle the fishing tackle, wipe their hands on their pants, and wipe certain foods such as an apple on their pants.

The agency thus developed a formula to calculate both direct and indirect exposure and combines both in its result.

OEHHA cited studies by the Consumer Product Safety Commission estimating hand-to-mouth exposure to lead from children’s polyvinyl chloride products and by the U.S. EPA Office of Pesticide Programs as a default value for use in estimating hand-to-mouth exposure to pesticides (U.S. EPA, 2001). In an exposure assessment of wood preservatives, the California Department of Health Services (CDHS) assumed hand-to-mouth transfer efficiency values of 50 percent for arsenic, chromium and copper, and 100 percent for pentachlorophenol.

“Indirect hand-to-mouth activities are more complex than the direct hand-to-mouth contacts and thus more challenging to characterize,” the draft interpretive guideline said.

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Since no data was “available to inform the selection of representative rates of indirect hand-to-mouth contact activity during fishing,” contact rates were selected based upon two scenarios. Scenario 1 was modeled on the consumption of bite sized snack foods such as chips, and Scenario 2 on the handling and eating of a relatively large object such as a sandwich or an apple. In any given hour, people were assumed to be exposed indirectly to lead from either Scenario 1 or Scenario 2.

The document cautioned readers that the values used do not apply to other products where hand-to-mouth transfer of lead may be a factor.

“This interpretive guideline covers lead transfer from the hands to the mouth in the context of fishing tackle use and does not apply to the handling of other products containing lead (e.g., power cords, crystal glassware). The values given above are intended for use only in the context of calculating lead exposure from fishing tackle for purposes of Proposition 65 compliance. These values may be modified as new relevant data become available,” the draft guideline said.

The interpretive guideline does not provide values for “the loading of lead from fishing tackle onto the hand (i.e., object to hand transfer) or lead transfer from the tackle directly to the mouth through mouthing the tackle.” Nor did the guideline address lead exposure from fishing tackle via the inhalation route, such as might occur as a cigarette to which lead has been transferred is smoked, or by the dermal route.

OEHHA is accepting public comments about the draft interpretive guideline until the workshop date of August 1. The workshop will be held in Sierra Hearing Room, California Environmental Protection Agency Building, 1001 I Street, 2nd Floor, Sacramento, California. Attendees are encouraged to provide oral comments on the draft guideline. The workshop will begin at 10:00 a.m. and will end when all business is conducted or 5:00 p.m.

Written comments provided in triplicate, along with supporting information, may be submitted via email to:

coshita@oehha.ca.gov or to:

Ms. Cynthia Oshita
Office of Environmental Health Hazard Assessment
Street address: 1001 I Street
Sacramento, California 95814
Mailing address: P.O. Box 4010 MS-19B
Sacramento, California 95812-4010
Fax: (916) 323-8803
Telephone: (916) 445-6900