

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

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INTEROFFICE COMMUNICATION

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TO: File for Phosgene (CAS # 75-44-5)

FROM: Robert Sills, AQD Toxics Unit Supervisor

SUBJECT: Phosgene ITSL change in the averaging time from 24 hrs to annual

DATE: September 9, 2015

The current ITSL for phosgene ( $0.3 \text{ ug/m}^3$ ) has a justification (attached) dated February 3, 2006. The averaging time (AT) assigned at that time was 24 hours, as per the default methodology (Rule 232(2)(b)). The current file review concludes that the AT may appropriately be set at annual, based on the nature and duration of the key study and the ITSL value derivation, as allowed under Rule 229(2)(b). Therefore, the AT is being changed from 24 hours to annual at this time.

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TO: Phosgene file (CAS # 75-44-5)  
FROM: Gary Butterfield  
SUBJECT: Screening level for Phosgene  
DATE: February 3, 2006

The EPA updated the IRIS entry for phosgene at the end of January with a new RfC. The new RfC is based on rat lung changes in rats following 13 weeks of exposure, as reported by Kodavanti et al (1997). The new RfC was set at 0.3 ug/m<sup>3</sup>. The new RfC is based on BMD calculations. For further details, see the current IRIS phosgene printout, or the Toxicological Review of phosgene.

EPA. 2006. IRIS documents are available at [www.epa.gov/IRIS](http://www.epa.gov/IRIS)