

Washington State Department of Ecology
Alternatives Assessment Advisory Group Meeting Notes
10/7/2014

Advisory Group Attendees: Dave Kalman, UW School of Public Health; Nadereh Afsharmanesh, Earth Friendly Products; Jason Duncan, Outdoor Research, Inc.; Alan Kaufman, Toy Industry Association; Brandon Housekeeper, Association of Washington Business; Homer Swei, Johnson & Johnson; Diane Barton, Columbia River Inter-Tribal Fish Commission; Lauren Heine, Northwest Green Chemistry; Brian Penttila, Pacific Northwest Pollution Prevention Resource Center; Frank Gonzales; Clean Boating Foundation/NW Marine Trades Association; Laurie Valeriano, Washington Toxics Coalition; Larry Garcia, Seattle City Light; Ken Zarker, WA State Department of Ecology. Not attending: Kevin Myette, Bluesign

Other attendees: Beth Percynski, P&G; Bill Struyk, J&J; Mellissa Gomboski, Personal Care Products; Rob Duff, Governor Jay Inslee's Policy Office

Ecology attendees: Michelle Underwood, K Seiler, Darin Rice, Denise Clifford, Stephanie Scott

Agenda:

- 1. Review of feedback on guide**
- 2. Facilitated discussion**
- 3. Governor's discussion**

Question from businesses: If a chemical component has a chemical hazard assessment completed, does it need to be conducted again?

Answer from Ecology: Probably not. For example, the Interstate Chemicals Clearinghouse is making chemical hazard assessments available to businesses. They are posted on the IC2 website for public use. There is also an emerging market to purchase hazard assessments that have been conducted by hazard profilers. Typically, all these assessments need to be peer reviewed prior to posting them publically. They will also need to be updated periodically as new information or toxicity data become available. Ecology is a member of the IC2 and is supporting efforts to share hazard assessment data. .

1. Feedback on guide:

- The group discussed the AA diagram and the optional initial hazard and performance screens. Several members recommend conducting the optional performance screen was a good idea prior to launching into the four AA modules. They indicated that performance is a critical factor when considering alternatives. Several members suggested the initial hazard initial screens as a good practice prior to before launching into the four AA modules.
- Scoping is also important prior to beginning an AA to help focus the work effort. Often, before beginning an AA, there is both a chemical prioritization and scoping exercise needed to help define the boundaries of the AA, in which businesses ask these questions:

- Why are we looking for a chemical alternative?
- Are functional improvements needed to the product?
- What's the problem we're trying to solve by switching to an alternative?
- Many businesses are going to look at performance first.
- Members suggested including a paragraph in the draft as a short explanation of the scoping process

2. Facilitated discussion:

- The members discussed the possible confusion of a scope of the WA AA discussion draft hazard assessment. The concern was related to the possibility that a hazard assessment would be conducted twice – in both the hazard module and the exposure module. Ecology clarified the intent of the WA AA discussion draft is focused on small and medium sized businesses with the recommendation of a basic exposure assessment as the appropriate level of effort for organizations with limited resources.
- The group reviewed the exposure module criteria listed in the IC2 guide that details the wide range of exposure assessment methods. It was recommended the WA AA guide include the reference to provide businesses and organizations that want to go beyond the level 1 assessment to use the IC2 guide.

There was interjection here from an individual stating there is a risk of over complicating the AA guide –reiterating that this is a BASIC guide aimed at small businesses.

At the end of the facilitated discussion, it was decided by everyone to just leave the sieve of assessment the way it is currently.

3. Governor's Policy on Toxics Reduction Initiative Discussion Draft:

- Rob Duff provided an overview of the Governor's initiative and providing authority to Ecology to require AAs as part of a regulatory program to address priority chemicals of concern. The slides were distributed to the group.
- **Department of Labor and Industries:** It was suggested to consider the role for L&I to integrate chemical hazard assessment assistance as part of the free consultation services offered to small businesses.
- **Ecology should work with other state agencies on chemical hazard education,** including: L&I, Dept. of Health, Dept of Social and Health Services, and Dept of Agriculture.
- Ecology needs to work on its image to businesses: "Here to help, not hammer" as there is reluctance from businesses to willingly invite the government into their facility for fear of being penalized.
- University of Washington also offers consultation services to businesses that support the Governor's initiative.

Input from businesses:

- Want Ecology to connect the dots:

- Define what chemicals are already translating to health outcomes
- Show clear, convincing evidence
- Want clear proof of science, and there is a continuing need to show studies to backup change of chemicals. The main concern is the huge financial risk for companies to switch to alternatives.

Additional comments:

- Think about additional info where needed in guide: simple education is essential.
- Don't make assumptions in guide about what companies already know.
- Suggesting chemical alternatives assessment and green chemistry be introduced in "Chemistry 101" college curriculum, and high school if possible.