

Phase 3

Ecology, in consultation with Department of Health, contracted with the Pediatric Environmental Health Specialty Unit (PEHSU) in the Department of Environmental and Occupational Health Sciences, University of Washington to provide expertise as part of our work to finalize the list of chemicals of high concern for children (Phase 3).

The contract included the following tasks: A) Review toxicological and exposure data for each chemical to ensure that each meets the criteria for CSPA listing including a check for errors and additional investigation of the weight of evidence for each listing; and B) recommend levels for each chemical that could trigger the reporting requirement.

The final report submitted by PEHSU can be found at <http://www.ecy.wa.gov/programs/swfa/rules/pdf/p3doh.pdf>.

Below is a short summary of their recommendations.

Error Check

Two types of errors were identified:

- 1) Errors that changed the Phase 2 score resulting in removal of the chemical for further consideration. One chemical (Benzoic Acid) was removed from the list due to an error in the Phase 2 scoring process.
- 2) Errors that did not change the final Phase 2 score. Ecology updated the score sheets for these chemicals to correct the errors identified in Phase 3. Updated score sheets are posted on Ecology's web site at <http://www.ecy.wa.gov/programs/swfa/rules/pdf/p2ss.pdf>.

Detailed Evaluation Phase 2 Scoring Data

The purpose of this Phase 3 task was to conduct a more thorough investigation of the chemistry, toxicology, and knowledge of exposure for each chemical identified in Phase 2. DOH and PEHSU recommended the removal of three chemicals from the initial reporting list; Propylene Glycol (CAS# 57-55-6), Mono-2-ethylhexyl Phthalate (MEHP) (CAS# 4376-20-9) and Diethyl Ether (CAS# 60-29-7). See the DOH/PEHSU report for details on the rationale for their removal. Ecology removed these chemicals from the list.

Reporting Trigger Levels

DOH/PEHSU recommended that reporting trigger levels be set as low as possible in order to better understand potential exposures and to assist in evaluation of hazards posed by children's products. Specifically, they recommend that reporting trigger levels be based primarily on concentrations that have been previously reported in children's products and materials from which they are likely constructed.

Ecology evaluated this recommendation and determined that for practical reasons, the focus should be on those chemicals that are intentionally added to children's products. By focusing on these chemicals we can better use our limited resources to reduce the amount of toxics in children's products and spur the identification and use of safer alternatives. Concentration of chemicals of concern present at 0.1% in product components (1000 ppm) is a commonly accepted value, used by jurisdictions such as the European Union, to indicate that a chemical is intentionally added to a product.

As a result, Ecology chose not to accept the recommendations of DOH/PEHSU with regard to individual reporting trigger levels for each chemical. Instead, Ecology chose to bracket reporting ranges around the commonly used value of 0.1% (1000 ppm) and the lower values recommended by the DOH and PEHSU for some chemicals. The lowest reporting range is from .001% (10 ppm) to .01% (100 ppm).