Hazard Assessment Discussions, 10/10/2012

1. What tools do you use?
    - Green Screen for safer chemicals
        - Good model, but onerous, difficult, inexhaustible format, needs to be truncated, so many exposure pathways
        - One consultant uses a modified spreadsheet rather than Word in using GreenScreen
        - Green Screen Lite
    - IRIS- Toxicity profiles- state requirements
    - OECD Toolbox
    - OECD/SIDS
        - Better for international/global manufacturers
    - The Works
    - ECOSAR
    - DfE
    - NTP
    - ExPub –
        - Must subscribe
        - $6000/yr for 5 users
        - GE uses this
    - 3E database
        - Must subscribe
        - SoCal Edison also uses this
    - Right Answer
        - Must subscribe
    - Environmental Priority Strategies
        - Volvo's in-house method
    - TopCat
        - There is a fee
    - When data is available - use bioassay data

2. What are challenges?
    - Data gaps, chemical not characterized for all endpoints
    - Specific tool does not work for all chemical and endpoints and need to know which tool or model to use when, with what;
        - example ECOSAR- Need training to use for good or best results

3. Are tools sufficient? What tools are needed?
    - Need for endocrine activity tools
    - Otherwise pretty good
    - Use combination of tools

4. Guidance Suggestions - What would you like to see in Guidance documents?
    - Describe process to address data gaps when using tools, i.e., if tool is not sufficient for specific need, endocrine activity
    - Guidance regarding low dose effects, especially regarding endocrine activity
    - Are the tools they are using acceptable under specified conditions?

    - Need to know how to comply
- Explain acceptable hierarchy of data and modeling
    - Data quality criteria
    - Can known data be used in lieu of models or tools?
- Clarify use of/avoidance of chemicals on CoC list as potential alternatives
    - Future additions to CoC list – example, if their alternative is added to CoC list later
- Important to marry HA with EA
- How to deal with trade-offs
- DTSC should say use tools that address A, B, C, D & E criteria and then allow use of other tools that are specifically suited to sectors/products.
    - The right tool depends on the end product
    - Different tools are better for different sectors/products
    - Different size companies need different tools (depending on size of company, # of toxicologists).
    - Don't try to pick tools that are "one size fits all." Won't work.
- It would preferable to some that the guidance not prescribe tools but rather provide a format or thresholds that need to be met.
- DTSC should be clear about format and submission requirements (end product) based on what the law/regs require.
    - DTSC should provide clear, explicit directions on what is required and what is the output (i.e., format) required.
    - Provide for a consistent, simple, predictable outcome so DTSC can make quick decisions
- DTSC should provide guidance on how companies should harmonize guidance on Hazard Assessment with other states (e.g. Maine?)
- DTSC should address thresholds and how to synchronize with existing standards and regs. (Example: LEED went back to 0.1 for simplicity/synchronicity).
- Communications Workers of America: Need clear, strong guidance from DTSC. Also asked if companies are using EU REACH for hazard assessment.

5. Other Ideas and Questions
    - Mentoring of smaller companies by bigger companies?
    - “Help Desk” or hotline for questions
    - Follow DPR registration as a model?
    - Be mindful of products such as tires, where the chemicals that go into the product are not the chemicals that come out. Be aware of lack of exposure.
    - Consult with DfE staff to see what works and hasn't worked in their alternatives assessment program.
        - Possibly incorporate DfE guidelines
    - How often is DTSC going to update the CoC and Priority Products lists?