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?