

STATE OF CALIFORNIA
Budget Change Proposal - Cover Sheet
 DF-46 (REV 07/14)

Fiscal Year 2015-16	Business Unit 3960	Department Department of Toxic Substances Control	Priority No. 4
Budget Request Name 3960-104-BCP-BR-2015-MR		Program 3630 Safer Consumer Products 9900100 Administration 9900200 Distributed Administration	Subprogram

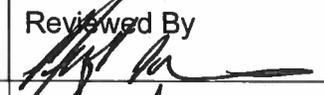
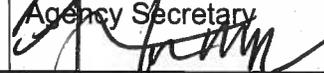
Budget Request Description
 Safer Consumer Products Priority Product Work Plan

Budget Request Summary

The Department of Toxic Substances Control requests 6.0 limited term positions and \$643,000 for two years from the Toxic Substances Control Account to implement the 2015-17 Priority Products Work Plan by expanding research capabilities and accelerating the rate at which consumer products containing toxic chemicals are evaluated and identified for inclusion in the Safer Consumer Products program.

Requires Legislation <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Code Section(s) to be Added/Amended/Repealed		
Does this BCP contain information technology (IT) components? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, departmental Chief Information Officer must sign.</i>	Department CIO	Date	
For IT requests, specify the date a Special Project Report (SPR) or Feasibility Study Report (FSR) was approved by the Department of Technology, or previously by the Department of Finance. <input type="checkbox"/> FSR <input type="checkbox"/> SPR Project No. Date:			

If proposal affects another department, does other department concur with proposal? Yes No
 Attach comments of affected department, signed and dated by the department director or designee. 9/25/15

Prepared By 	Date 5/8/15	Reviewed By 	Date 5/8/15
Department Director 	Date 5/12/15	Agency Secretary 	Date 5/12/15

Department of Finance Use Only

Additional Review: Capital Outlay ITCU FSCU OSAE CALSTARS Technology Agency

BCP Type: Policy Workload Budget per Government Code 13308.05

PPBA Date submitted to the Legislature

A. Budget Request Summary

The Department of Toxic Substances Control (DTSC) requests 6.0 limited-term positions and \$643,000 for two years from the Toxic Substances Control Account (TSCA) to implement the 2015-2017 Priority Product Work Plan. These additional resources would enable DTSC to expand research capabilities and accelerate the rate at which consumer products containing toxic chemicals can be evaluated and identified for inclusion in the Safer Consumer Products (SCP) program.

B. Background/History

SCP Program Description and Statutory Authority

Since 2003, the Legislature has passed and governors have signed various laws that assign DTSC responsibility for administering and enforcing bans and restrictions on the use of toxic chemicals in consumer products sold in California. Traditionally, these laws each focused on a single product-chemical combination identified by the Legislature (e.g., metals in packaging, lead in children's jewelry, mercury-added devices, and toxic metals in brake pads).

The enactment in 2008 of the Green Chemistry statutes shifted California's strategic approach to addressing toxic chemicals in products by requiring DTSC to establish in regulation processes for identifying and prioritizing chemicals of concern in consumer products and evaluating alternatives to those chemicals so as to reduce adverse impacts and exposures. This approach provides science-based criteria and procedures for identifying and evaluating product-chemical combinations of concern and their alternatives with the objective of replacing chemicals of concern with safer chemicals and avoiding the use of substitute chemicals that pose equal or greater harm.

On October 1, 2013, DTSC adopted the SCP regulations. The statute and the regulations reduce the need for legislation to adopt chemical-by-chemical bans. The SCP regulations also establish a process for evaluating chemicals of concern in products and their potential alternatives in order to determine how best to limit exposure or to reduce the level of hazard posed by a chemical of concern. Pursuant to the SCP regulations, DTSC utilizes a four-step continuous, science-based, iterative process to identify safer product alternatives for consumers:

1. Chemicals – The regulations establish a list of “candidate chemicals” based on work already completed by other authoritative organizations and specify a process for the DTSC to identify additional chemicals as candidate chemicals.
2. Products – The regulations require DTSC to evaluate and prioritize product/candidate chemical combinations to develop a list of priority products that require alternatives analyses. DTSC must adopt priority products via rulemaking to require Steps 3 and 4.
3. Alternatives Analysis – The regulations require responsible entities (manufacturers, importers, assemblers, and retailers) to notify DTSC when their product is listed as a Priority Product and to perform an alternatives analysis for the product to determine how best to limit exposures to, or reduce the level of adverse public health and environmental impacts posed by, the hazardous chemicals in the priority product.
4. Regulatory Responses – The regulations require DTSC to identify and implement regulatory responses designed to protect public health or the environment, and maximize the use of acceptable and feasible alternatives of least concern.

SCP Program Activities

DTSC conducted extensive research to identify three proposed priority products. The initial proposed priority products were announced in March 2014 and supporting documents are being developed to adopt the proposed priority products into the SCP regulations. DTSC invested significant resources and time to research the wide variety of potential priority products, and to engage in dialogue with responsible entities, manufacturers and other interested parties through meetings, presentations, webinars, and workshops. This effort provided the SCP program with an understanding of product manufacturing processes, technical specifications and chemistries critical to product design, manufacture and use.

Priority Product Work Plan

The SCP regulations require DTSC to develop a Priority Product Work Plan every three years. The Priority Product Work Plan guides the SCP program's focus by identifying consumer product categories to evaluate and select Priority Products for the next three years. In April 2015, DTSC finalized a Priority Product Work Plan for 2015-2017 and includes seven consumer product categories:

- Beauty, personal care and hygiene products;
- Building products and household, office furniture and furnishings;
- Cleaning products;
- Building products and household, office furniture and furnishings;
- Clothing;
- Fishing and angling equipment; and
- Office machinery (consumable products).

C. State Level Considerations

This proposal is consistent with the strategic objectives of DTSC and other state and local government agencies.

- DTSC Strategic Plan – DTSC's 2014-18 strategic plan identifies the adoption of SCP regulations and the initial list of priority products and the development of alternatives analyses guidance documents as key objectives. These are important objectives because they will ultimately change the way products are designed and manufactured. They will also help to hold manufacturers responsible for the life cycle impacts of their products.
- California Department of Public Health (CDPH) – CDPH is responsible for administering the Safe Cosmetics Program. This program requires manufacturers of cosmetics to disclose certain hazardous ingredients in their products. Since cosmetics constitute one of the seven products in the priority work plan, this proposal serves to support the work performed by CDPH.
- CalEPA - DTSC works closely with other CalEPA Boards, Departments, and Office (BDOs). For example, DTSC pays close attention to the evaluation of hazards conducted by Office of Environmental Health Hazard Assessment (OEHHA) and consults with their experts. OEHHA regulations dictate specific hazard traits that DTSC must consider in the implementation in the SCP program. In addition, the Air Resources Board looks extensively at many consumer products some of which fall within the categories named within DTSC's Work Plan. DTSC will work with ARB to determine whether or not there are hazards it can address beyond those which ARB has the authority to regulate. Finally, protection of aquatic resources against impacts from consumer products constitutes a policy priority set forth in the work plan. Consequently, DTSC will rely on water quality and bioaccumulation data generated by the State Water Resources Control Board during the product prioritization research.
- Biomonitoring California - DTSC has identified biomonitoring data as a priority data source for its Work Plan and will use any relevant information from Biomonitoring California, which is a collaboration between DTSC, OEHHA, and CDPH.
- California Environmental Policy Council - The authorizing statute requires that SCP rulemaking activities be reviewed by the California Environmental Policy Council. This council is comprised of the CalEPA Secretary and the directors or chairpersons of each CalEPA BDO. This procedural requirement ensures that DTSC's SCP program is coordinated with each BDO and does not conflict with other CalEPA authorities or programs.

D. Justification

The Safer Consumer Products program is comparatively new for DTSC, having been established in 2013. As a new program, DTSC is continually evaluating its resources needs and the expertise and skill sets required of program staff to ensure SCP's success. Consequently, DTSC is requesting additional resources on a limited-term basis.

Analysis of Problem

Under this proposal, the additional resources would help to expand the number of priority products identified and spur the development of safer products in a manner consistent with statute. DTSC is intent on ensuring the success of the policy objective of stimulating market incentives and accelerate the voluntary design, development and innovation of safer products. To achieve this goal, DTSC requests 6.0 two-year limited-term positions to support the implementation of the 2015-2017 Priority Product Work Plan. They are as follows:

- Research Scientist - DTSC requests 1.0 Research Scientist to research potential products with chemicals of concern to increase the pace of public health and environmental protection. During the first year of SCP program implementation, scientists and toxicologists spent an equivalent of six PYs to evaluate a number of potential Priority Products, of which three were selected to go forward as Priority Products. DTSC is in the process of adopting regulations that will codify their selection. An additional Research Scientist would allow the SCP program to research and identify more Priority Products from the categories called out in the Work Plan.
During the first year of implementation, unanticipated but necessary scientist workload included technical reviews of media press releases, website information, frequently asked questions, workshop presentations, meetings and letters from industry and revising reports. During this time, managers were also doing staff work in order to meet the need for technical expertise.
- Environmental Scientist – DTSC requests 1.0 Environmental Scientist position to address the technical aspects of rulemaking packages. The Environmental Scientist will serve as the subject matter expert for rulemaking, including writing and coordinating the initial and final statement of reasons, responding to public comments, and preparing and managing the required external scientific peer review.
- Staff Toxicologist – DTSC requests 1.0 Toxicologist dedicated to, and focused on, the needs of the SCP program as it implements the 2015-2017 Priority Product Work Plan. Currently the SCP program is competing with other Department programs to use the pool of staff toxicologists, who work on chemical exposures to public and environment from hazardous waste and cleanup activities. The SCP program is currently using the equivalent of two staff toxicologists from this pool for researching products with chemicals of concern.

While the SCP program will continue to use the Department's pool of toxicologists, a dedicated Staff Toxicologist is necessary to develop and institutionalize changes beyond the department's traditional toxicology work in hazardous waste management and cleanup activities to toxicological science specific to SCP activities. The Staff Toxicologist will be able to address the paradigm shift and develop methods to identify and verify chemical hazards, predict harmful chemical effects in the absence of scientific data and studies, and develop consumer products exposure scenarios. These skills are needed to aid in prioritization decisions when identifying potential Priority Products and reviewing alternatives analysis from responsible entities.

The Staff Toxicologist would allow the SCP program access to at least one Staff Toxicologist for two years to work on high priority projects with short turnaround. Other SCP work may be assigned to the pool of toxicologists based on their availability from other hazardous waste and cleanup activities and the dedicated Staff Toxicologist will provide SCP-specific expertise to the Department's pool of toxicologists as needed.

Within the two years, DTSC anticipates legal challenges to the scientific basis used to identify Priority Products and the Staff Toxicologist will serve as a key expert in the State's defense of our Priority Product selection. DTSC has been threatened with lawsuits from manufacturers throughout the development and implementation of the SCP regulations, specifically regarding harmful exposures from chemicals in consumer products. While DTSC has the authority to adopt Priority Products based on their *potential* for exposure, a Staff Toxicologist will strengthen DTSC's position with qualitative or quantitative chemical exposure information.

- Hazardous Substances Engineer – DTSC requests 1.0 Hazardous Substances Engineer with manufacturing experience to implement the 2015-2017 Priority Product Work Plan. The Department has 30 years of experience with the hazardous waste industry, but less than one

Analysis of Problem

year of experience with product manufacturing. It is critical that the SCP program understand the product manufacturing industry and anticipate and address manufacturing impacts during researching and identifying Priority Products, as well as providing product-specific Alternatives Analysis technical guidance.

For instance, the SCP program identified unreacted diisocyanates in spray foam insulation as a draft Priority Product in 2014. The SCP program learned from the spray foam industry that only certain types of spray foam insulation have the potential to contain unreacted diisocyanates. Having in-house manufacturing expertise will facilitate better and faster research on potential Priority Products to meet the policy objective "...to demonstrate that it can rapidly deploy a program capable of expeditiously acting on known chemical hazards..." (AB 1879, Senate Committee on Environmental Quality, August 21, 2008) and reduce the reliance on industry-supplied information and data.

- Information Officer – DTSC requests 1.0 Information Officer to initiate and respond to the media and conduct outreach efforts as SCP program staff implement the 2015-2017 Priority Product Work Plan and follow up activities. As the SCP program is the first of its kind in the nation, there is significant interest and many inquiries from print, web-based, and television media as DTSC continues its implementation. During the initial Priority Products launch, there was misinformation, opposition campaigns and rumors from the media that created an unanticipated workload as DTSC worked to ensure the public and affected stakeholders received accurate and appropriate information. The Information Officer would be able to quickly respond to media questions and proactively explain decisions resulting from the 2015-2017 Priority Product Work Plan.

In addition, the Information Officer will proactively address media and outreach efforts and facilitate, as needed, workshops, trainings, stakeholder meetings, public meetings and seminars.

- Clerical Support – DTSC requests 1.0 Office Technician to support staff during implementation of the 2015-2017 Priority Product Work Plan. The Office Technician would provide office support such as making copies, formatting documents, making travel arrangements, processing travel claims, finding locations to hold workshops and meetings and arranging for webinars. These clerical activities would allow technical staff to work on research, technical assistance, developing guidance and reports.

In addition to the positions requested above, DTSC proposes to redirect two existing permanent positions to provide additional resources needed to successfully implement the Work Plan:

- Research Program Specialist (Economic) – DTSC proposes to redirect and reclassify 1.0 Environmental Scientist position to a Research Program Specialist (Economics) position. This position will address three areas during implementation of the 2015-2017 Priority Product Work Plan and activities required after identifying the Priority Products – exposure, regulation economic impacts, and alternatives cost-benefit analysis. During the Priority Product research and identification process, marketing and economic cost information is needed to help identify and prioritize the potential Priority Products.

DTSC has limited expertise and tools in marketing and economics. This is a significant issue because sales and marketing information may be used as surrogate information to identify the volume of chemicals used in consumer products and the potential chemical exposure to consumers and environment. In addition, the regulatory review process requires DTSC to conduct an economic impact analysis, which requires a background in economics. Finally, during the alternatives analysis process, this position would provide information to DTSC staff on cost benefit analysis for safer alternatives in comparison to the chemical of concern in the Priority Product. DTSC staff would be able to use the information to develop product-specific technical guidance to responsible entities.

- Research Scientist – DTSC proposes to redirect and reclassify 1.0 Environmental Scientist position to a Research Scientist position. This position will provide additional research on

Analysis of Problem

potential products with chemicals of concern enabling DTSC to accelerate identification of more Priority Products, thereby providing a greater degree of public health and environmental protection.

As previously noted, in fiscal year 2016-17, the SCP Program will begin development of the 2018-2021 Priority Product Work Plan as required in the SCP regulations.

E. Outcomes and Accountability

With the resources requested, DTSC would be able to implement the 2015-2017 Priority Product Work Plan, which serves to:

- Increase the development of safer consumer products through mandatory and voluntary means.
- Increase the number and accelerate the pace of priority products identified each year.
- Provide data and information to substantiate exposure from priority products.
- Adopt priority products with sound economic analysis.
- Understand manufacturing processes and make decisions accordingly for priority products and alternatives analysis.
- Anticipate public and industry concerns and mitigate those concerns proactively.

To ensure accountability and transparency, DTSC is committed to the following:

- **Public Outreach** – For each category in the work plan, DTSC intends to have public workshops, webinars, and face-to-face meetings with stakeholders, including manufacturers, retailers, non-governmental agencies, and consumer advocacy groups, among others.
- **Internet** – DTSC has created a new page on its website dedicated to informing the public on issues concerning SCP. In addition, DTSC has established CalSafer, a database and web tool that allows DTSC to publish documents for public comment concerning the SCP Work Plan. CalSafer allows the public to comment on specific SCP issues online and submit supporting documents electronically. DTSC will consider the information submitted through CalSafer in the rulemaking process.
- **Green Ribbon Science Panel** – The Panel provides advice and acts as a resource to the Director of the Department of Toxic Substances Control and the California Environmental Policy Council on a variety of scientific and technical matters related to developing green chemistry and chemicals policy recommendations and implementation strategies. Among other things, the panel may provide advice on ways of reducing adverse health and environmental impacts of chemicals used in commerce, as well as the overall costs of those impacts to society, by encouraging the redesign of consumer products, manufacturing processes, and approaches. The panel also assists DTSC in developing green chemistry and implementation strategies. Finally, the panel advises DTSC and makes recommendations about which hazard traits and toxicological end-point data should be collected to address critical data gaps.

F. Analysis of All Feasible Alternatives

Alternative 1: Approve the proposal for 6.0 limited-term positions and \$643,000 to implement the 2015-2017 Priority Product Work Plan.

Pro:

- Allows for the identification of more priority products and adopts them into regulation more quickly.
- Could accelerate the availability of safer products to consumers.
- Accelerates voluntary efforts to develop safer products.
- Utilizes redirection of existing resources to the extent feasible.

Analysis of Problem

Con:

Increases expenditure and position authority.

Alternative 2: Redirect all positions from existing resources.

Pro:

- Does not require additional position authority.
- Allows DTSC to identify more priority products and adopt them into regulation more quickly.
- Could accelerate the availability of safer products to consumers.
- Accelerates voluntary efforts to develop safer products.

Con:

- Creates a backlog in other mission critical areas in DTSC.
- Would require reduction or elimination of critical resources needed for legal, laboratory, information technology and enforcement support.
- Would not provide the requisite expertise as this is currently lacking in the department.

Alternative 3: Maintain status quo – do nothing.

Pro:

- Results in no increased costs or position authority.

Con:

- Substantially impairs the development of safer products.
- Potentially harms consumers and the environment due to fewer priority product identification and adoption.
- Slow implementation of SCP regulations may undermine the success of the program overall.

G. Implementation Plan

July to October 2015: Advertise and hire staff. Continue regulatory adoption of the initial three Priority Products with an effective date in 2016. Implement 2015-2017 Priority Product Work Plan.

November to December 2015: Bring new staff up to speed and integrate them into the implementation of the 2015-2017 Priority Product Work Plan.

January 2016 to June 2017: Identify Priority Products from the product categories in the 2015-2017 Priority Product Work Plan, conduct workshops and adopt identified Priority Products into regulations. Begin development of the 2018-2021 Priority Product Work Plan. Review need for limited term positions and take action as necessary (e.g., let limited terms expire, renew for another two years, or make limited term positions permanent). Provide product specific technical guidance for newly identified Priority Products.

H. Supplemental Information

This proposal includes standard operating expenses which include general expense, communications, travel, and training.

I. Recommendation

Implement Alternative 1. This alternative ensures DTSC has the resources to implement the SCP Work Plan over the next two years.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
 Workload Analysis Chart
 Budget Request Name: 3960-104-BCP-BR-2015-MR
 Budget Request Description: Safer Consumer Products: Priority Products Work Plan
 PRIORITY: 4

ACTIVITY/TASK	Basis/Assumption for Workload Standard	PROJECTED 2015-16				NUMBER OF ADDITIONAL HOURS NEEDED
		HOURS TO COMPLETE TASK	NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY	
Research Scientist Research, data gathering, and evaluation of chemicals & products, prepare and post draft or final Priority Products list & supporting information for up to 5 Priority Products. Participate as subject matter expert for Priority Product workshops and meetings. Respond to industry and stakeholder questions.	Hours spent in 2014. Calstars labor data	1400	5	7,000.00	5,204.00	1,796.00
Environmental Scientist Prepare rulemaking documents for 3 Priority Products. Draft Initial Statement of Reasons. Respond to comments received from public and finalize all technical regulatory documents required to adopt regulations for Priority Products	Using Calstars Labor data estimated hours by adjusting hours spent on drafting and finalizing Safer Consumer Product regulations in FY 2013/14	1800	1	1,800.00	-	1,800.00
Engineer (Manufacturing) Develop procedures and protocols for AA reviews & audits; notice processing; trade secret handling; and enforcement. Develop and contribute manufacturing expertise to product specific Alternatives Analysis guidance, identification of potential priority products and manufacturing process technical assistance to staff	based on Calstars labor data	6500	1	6,500.00	5,106.00	1,394.00
Staff Toxicologist. Exposure research. Provide exposure research and analysis for five Priority Products Establish product toxicology protocols. Establish process and methods for toxicological evaluation of chemicals in products. Provide toxicological technical assistance.	estimated hours spent on Alternatives Analysis Guidance	550	10	5,500.00	5,104.00	396.00
Information Officer Industry Outreach. Conduct outreach to industry on potential Priority Products to gain additional information prior and during adopting Priority Products and Alternatives Analysis Responding to Inquiries. Respond to public and industry questions on Priority Products and Alternative Analysis	based on Calstars labor data for Toxicology	200	5	1,000.00	-	1,000.00
	estimate based on hours spent on research provided for Priority Products	800	1	800.00	-	800.00
	data from Calstars Labor reports on similar activities	800	1	800.00	-	800.00
	data from Calstars labor reports on similar activities	800	1	800.00	-	800.00

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
 Workload Analysis Chart
 Budget Request Name: 3960-104-BCP-BR-2015-MR
 Budget Request Description: Safer Consumer Products: Priority Products Work Plan
 PRIORITY: 4

ACTIVITY/TASK	Basis/Assumption for Workload Standard	HOURS TO COMPLETE TASK	PROJECTED 2015-16			NUMBER OF ADDITIONAL HOURS NEEDED
			NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS IN BASE FOR ACTIVITY	
Media Outreach. Coordinate, prepare and conduct media outreach for Safer Consumer Program workshops and meetings	previous public participation on Safer Consumer Program Priority Product workshops	40	6	240.00	-	240.00
Office Technician						
Travel for meetings, training, workshops, seminars. Prepare travel for staff and Green Ribbon Science Panel, including transportation and accommodations planning and reservations. Prepare and process travel reimbursement forms for staff and Green Ribbon Science Panel.	travel for Green Ribbon Science Panel	8	50	400.00	-	400.00
Coordinate and schedule meetings. Ensure appropriate equipment is available for meetings, such as computers, teleconferencing equipments, and paper easels and pens	Estimate based on estimate of current staff time	2	100	200.00	-	200.00
Customer service. Answer, transfer and take telephone messages to the appropriate person.	Estimate based on estimate of current staff time	0.1	2500	250.00	-	250.00
Sort and distribute mail. Maintain internal documents, such as, calendars, phone lists, and vacation schedules	Estimate based on estimate of current staff time	0.2	2500	500.00	-	500.00
Clerical tasks. Conduct clerical work, such as, preparing binders, making labels, filing, mail outs, etc. Finalize documents according to Department standards prior to mailing out	Estimate based on estimate of current staff time	3	50	150.00	-	150.00
Timesheets. Check and process timesheets.	Estimate based on estimate of current staff time	16	12	192.00	-	192.00
Purchase orders. Order and purchase office supplies not available in stockroom	Estimate based on estimate of current staff time	8	10	80.00	-	80.00
Maintain office equipment. Maintain copier equipment. Call for service as needed. Follow through as needed	Estimate based on estimate of current staff time	8	4	32.00	-	32.00
TOTAL HOURS REQUIRED PER YEAR				26,244.00	15,414.00	10,830.00
NUMBER OF PY (Position) NEEDED (HRS/1800)				14.58	8.56	6.02

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Workload Analysis Chart

Budget Request Name: 3960-104-BCP-BR-2015-MR

Budget Request Description: Safer Consumer Products: Priority Products Work Plan

PRIORITY: 4

ACTIVITY/TASK	Basis/Assumption for Workload Standard	PROJECTED 2015-16					NUMBER OF HOURS IN BASE FOR ACTIVITY	DIFFERENCE ADDITIONAL HOURS NEEDED
		HOURS TO COMPLETE TASK	NUMBER OF TASKS PER YEAR	NUMBER OF HOURS NEEDED PER YEAR	NUMBER OF HOURS NEEDED PER YEAR			
Research Program Specialist - Economics (Redirected Position)								
Research, coordinate, prepare economic impact reports for Priority Product profiles and revise the economic impacts for the regulatory adoption process.	based on staff hours spent on Form 399 for the Safer consumer Product regulations and background document by consultant	160	9	1,440.00			1,440.00	
Research, coordinate, prepare economic impact reports for product specific Alternatives Analysis Guidance and provide technical assistance to staff as needed for Alternatives Analysis technical assistance	based on staff hours spent on Form 399 for the Safer Consumer Product regulations	80	5	400.00			400.00	
Research Scientist (Redirected Position)								
Research, data gathering, and evaluation of chemicals & products, prepare and post draft or final Priority Products list & supporting information for up to 5 Priority Products. Participate as subject matter expert for Priority Product workshops and meetings. Respond to industry and stakeholder questions.	Hours spent in 2014. Calstars labor data	1400	5	7,000.00		5,204.00	1,796.00	
TOTAL HOURS REQUIRED PER YEAR				8,840.00		5,204.00	3,636.00	
NUMBER OF PY (Position) NEEDED (HRS/1800)				4.91		2.89	2.02	
*Note: These positions will be redirected within DTSC								

