

Topic #1 --- Alternatives Assessments (as described in AB 1879) – Case Study

Introduction

The discussion on Alternatives Assessment on the June 1 call was particularly useful, and it would be even more valuable to try to be even more specific and concrete. Therefore, for the June 7, 2001 teleconference, the topic questions have been edited to incorporate how they would apply to a formulated product, such as a window cleaner. By referring to a specific formulated product it is hoped that the subcommittee members will be able to build from their ideas and input from the first discussion, and put them into the context regarding an AA for a formulated product, i.e., a window cleaner.

Question #1A: What basic requirements in an AA for a window cleaner contain that will meet the requirements of HSC section 25253? (What basic requirements should a compliant AA contain and should be set out in the regulations?)

- (i) At a minimum, what should the AA for a window cleaner contain that will meet HSC 25253? Should a basic requirement in the window cleaner AA include consideration or evaluation of whether the chemical of concern is necessary in the product? If not, what? Or are there other basic requirements?
- (ii) What are the minimum steps or procedures (i.e, process) needed in the AA evaluation for the window cleaner that the manufacturer must follow?
- (iii) What pre-screen criteria should be used to decide whether the potential alternatives for the window cleaner should be addressed in the AA? How should the term “availability of potential alternatives” be defined?
- (iv) What kind of guidance or requirements should be used to determine the potential alternatives for the window cleaner when evaluating the economic impacts (cost) and performance (product function) factors?

Question #1B: What are the basic requirements (if any) that would meet the life cycle requirements of HSC section 25253 for the window cleaner? Are the requirements for a window cleaner life cycle assessment satisfied by “life cycle thinking”, life cycle inventories, or more full blown life cycle analyses?

- (i) For example, the potential alternatives identified for a window cleaner are: (1) glacial acetic acid and water, (2) household vinegar and water and (3) household ammonia and water. Should each potential alternative undergo a complete full blown life cycle analysis for each of the 13 factors? Or can “life cycle thinking” be used to satisfy all or some of the 13 factors instead of a more full blown life cycle analysis?

Question #1C: Should / how should the window cleaner AA evaluation group the 13 elements specified in HSC section 25253? Should the 13 elements be sequenced or be left entirely to the discretion of the entity performing the AA on window cleaner?

- (i) Should the window cleaner AA be staged so to screen out alternatives as the AA progresses from one stage to the next (see *Attachment 1-2*)?

For example, should the AA sequence for the window cleaner be:

- Step 1. Group, evaluate and screen out the potential alternatives impacts based on the health and environmental factors.
- Step 2. Group, evaluate and screen out the potential alternatives impacts based on the life cycle of the potential alternative.
- Step 3. Evaluate product performance, useful life and cost factors for the remaining potential alternatives for window cleaner.

Is this the most effective sequence and is it considered “proportional”?

- (ii) Elements (A) and (B) are properties of an alternative, whereas, elements (C) through (M) are impacts of an alternative. Should the window cleaner AA use the first two elements to screen out alternatives before, after or simultaneously with consideration of the other elements?

Question #1D: What data or other information should be required or developed and evaluated to support the window cleaner AA analysis?

- (i) What would be the minimum documentation and data requirements to address each of the 13 elements specified in HSC section for the window cleaner AA? Would trade secret data that has been peer reviewed be acceptable (i.e., transparent, rigorous, and consistent)?
- (ii) Should the window cleaner AA analysis use tools or instruments that are commonly available, but are proprietary (e.g., fill in the information and the tools/instrument (e.g., model) provides an answer to use for comparison with potential alternatives to the window cleaner)? Would the proprietary models satisfy the following criteria: transparent, rigorous, and consistency?

Question #1E: What is a reasonable timeframe to allow for completion of the window cleaner AA evaluation to address and meet the requirements of HSC section 25253?

Question #1F: Other related ideas for formulated products? Assembled products?