

Jae Choi – Two pages

Quality Assurance of Alternatives Assessments

Q#3A – Qualification for person conducting AAs

- i) One who has experiences in chemical hazard and toxicology assessment and regulatory policies in EPA, OSHA, etc. and has recently employed in those areas. One who has some level of expertise in chemicals, formulations, and assembled products.
- ii) As long as a person who is currently employed in the area outlined in (i) may need to get re-certified according the “best practice.”

Q#3B – Regulations to require review/verification of an AA by 3rd party?

Any additional review and verification adds cost and delay in the approval process. DTSC should be the primary decider whether the re-review and verification is required. The 3rd party review may be required WHEN

- i) the AA is resulted in ‘reject’ by DTSC and requested re-review by Applicant
- ii) Rejection reasons based on the AA process and tools (metrics/numeric scores, toxicology data on chemicals, environmental and human health effects, etc.) are not accepted by Applicant.

The re-review and verification should be conducted in the presence of all parties (Applicant, DTSC, 3rd party, and Science Review Board when challenged by Applicant).

Q#3C – What should be included in AA work Plan

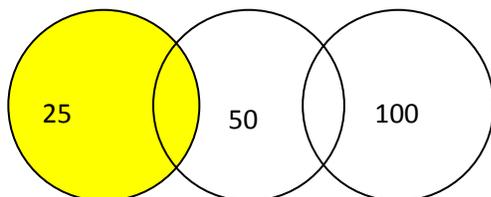
- i) DTSC checks if the standard work plan (tool) required are completed by Applicant
- ii) The first review of the standard work plan submitted by Applicant performed by DTSC should be sufficiently acceptable

Use 25 – 50 – 100 rule –

25 – Requires DTSC review only

50 – Requires re-review/verification by DTSC and 3rd party in the presence of Applicant

100 – Requires the Science Board review in the presence of DTSC, 3rd party, and Applicant



Quality Assurance for Alternatives Assessment

