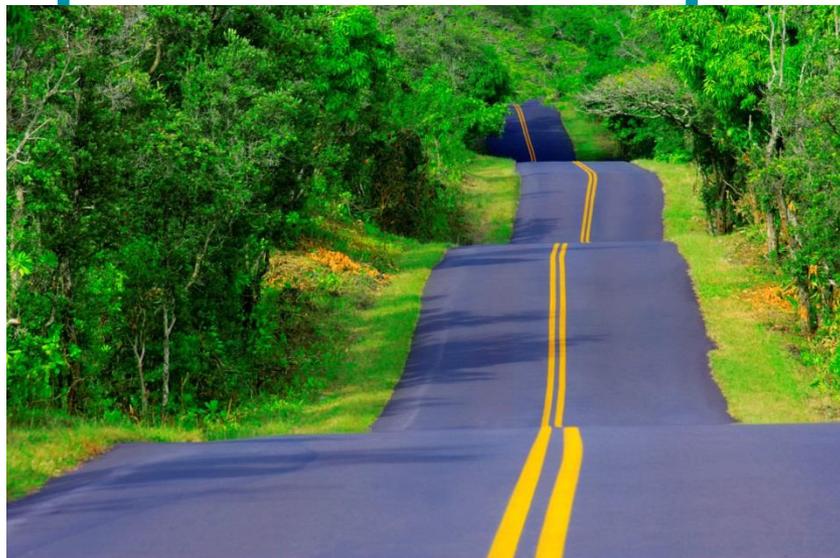




# Safer Consumer Products Regulations Implementation Update

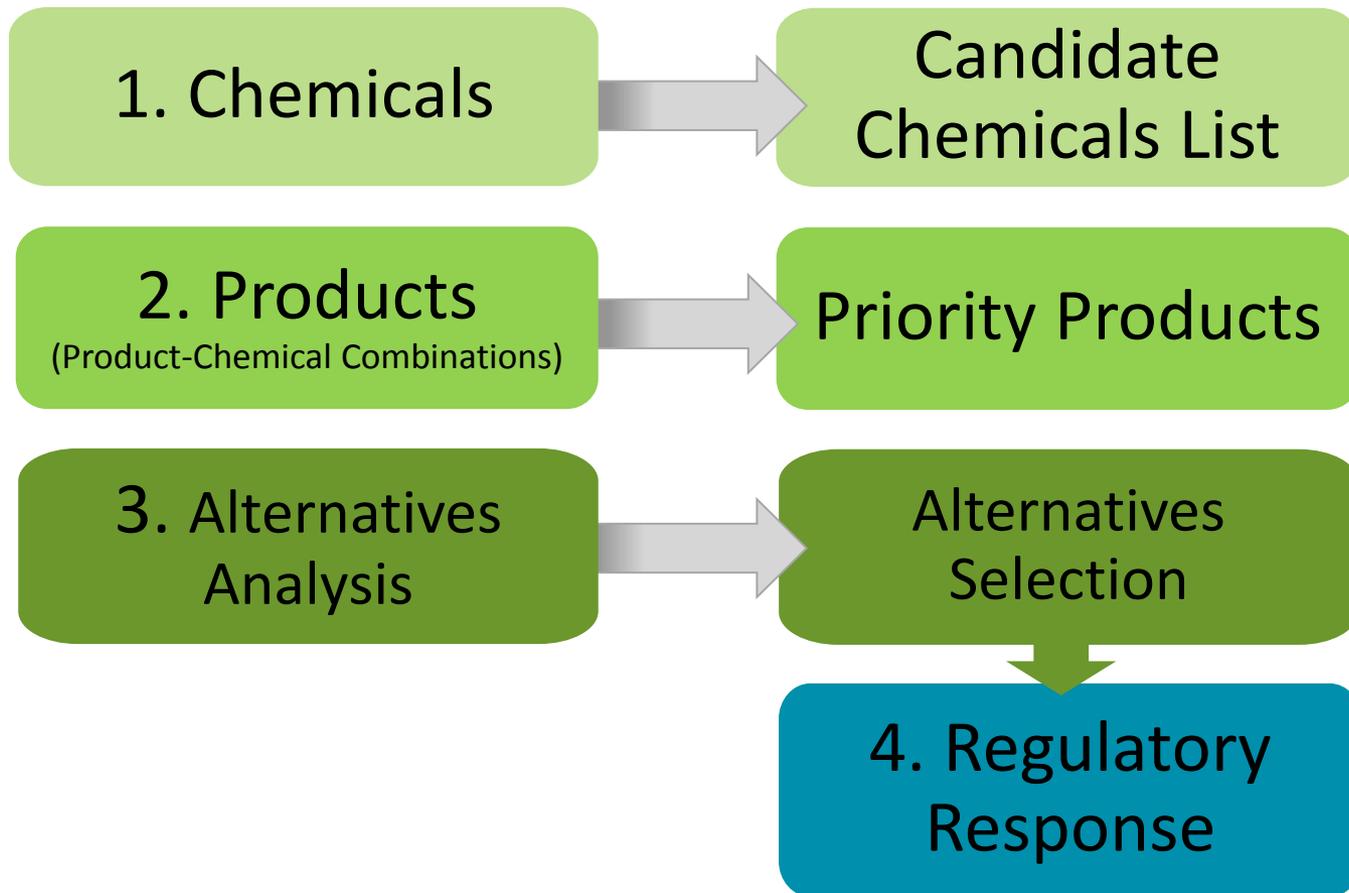


Department of Toxic Substances Control



Cal/EPA

# How it Works: The SCP Regulations



# Candidate Chemicals

- Informational Candidate Chemical List database recently updated
- 7 of 23 lists had changes (+ or -)
  - EC Annex VI
  - IARC Carcinogens
  - Prop 65
  - CA MCLs
  - CDC 4th National Exposure Report
  - CECBP - Priority Chemicals
  - OEHHA RELs
- 19 Chemicals Added
- 10 Chemicals Dropped



Work Plan list >1,100

<http://www.dtsc.ca.gov/SCP/ChemList.cfm>



# Priority Products

Initial selections – March, 2014

1. Children's Foam-padded Sleeping Products containing TDCPP
2. Paint Strippers containing Methylene Chloride
3. Spray Polyurethane Foam Systems with unreacted diisocyanates

- Statewide workshops and stakeholder engagement...
  - Refined/revised scope and info on initial PPs...



# Initial Priority Products Revisions

1. Children's Foam-padded Sleeping Products containing TDCPP
  - *Added TCEP*
  - *Added pillows*
2. Paint Strippers containing Methylene Chloride
  - *No surface cleaners*
3. Spray Polyurethane Foam Systems with MDI
  - *Only unreacted MDI*
  - *Only two part foams*



# Changes and Refinements to SPF

## Original Concept:

- Pressurized Insulation and Roofing Systems
- One Component Systems
- Chemicals of concern: MDI, TDI and HDI

## Current Concept:

- Insulation and Roofing Systems (pressurized two component)
- Eliminated One Component Systems
- Roofing Systems do not include coatings
  - *Eliminates TDI and HDI as chemicals of concern*



# Next Steps on Draft Priority Products

- Initiate rulemaking to adopt PP List: Early 2015
  - Priority Product “listing” language
  - Supporting documents
  - Economic and Fiscal Impact Statement
  - External Scientific Peer Review
  - Environmental Policy Council review



# Other Rulemaking....

- Candidate Chemical List revision:
  - Correct references to EU list for Substances of Very High Concern in accordance with Article 59 of Regulation (EC) 1907/2006 on the basis of Article 57(f) for endocrine disrupting properties, and
  - for persistent, bioaccumulative and toxic (PBT), or very persistent and very bioaccumulative properties



# Alternatives Analysis

- Currently developing draft guidance
- Green Ribbon Science Panel input
- Targeting release of draft early 2015
- Subsequent stakeholder input via comments, workshops, webinars, etc.



# Alternatives Analysis Guide

- Tool Box approach
- Pilot AA's
- Tool use and training:
  - Green Screen
  - EPA Tools
  - Exposure modeling
  - LCA Tools



Tasks	2014				2015				2016				2017				
	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	
Ongoing Departmental Activities	propose priority products			3yr workplan due Oct 1					Adoption of Priority Products	1st round of AA's being conducted -two phases				Final AA reports due			
	Alternatives Analysis Guide Development								Assist with AA's underway								
AA Tool Box	OECD development of AA Tool Selector and Tool Box		Review additional tools for Tool Box														
Pilot Alternatives Analysis				Scope Pilot AA effort	Conduct Pilot Alternative Analysis				revise AA guide								
Tool module development					EPA Tools Training	Green Screen Training	Exposure modeling	Life cycle tools	Develop online modules			Survey trainees for outcomes					
Workshops on AA Guidance				gap analysis on current AA training and tool needs	Develop workshop materials			Workshops on AA methods, tools and approaches				Survey attendees for outcomes					
Reporting																Draft final report	



# Facilitating the dialogue: CaSAFER System

- Fast and Convenient
- Allows comment entry and document upload
- More efficient for DTSC
- Allows users to review comments submitted by other stakeholders

<https://cit.dtsc.ca.gov/scp/comments/commentslite/>





[Return](#)

## Draft Priority Product Work Plan

### Action:

The Department of Toxic Substances Control (DTSC) is seeking public comments on the draft Priority Product Work Plan.

### Summary:

This work plan identifies and describes the product categories that will be evaluated during the next 3 years. The work plan includes a general explanation of the processes used to select the listed product categories. It is intended to provide a level of predictability to manufacturers and other responsible entities, and to California consumers about the range of product-chemical combinations that DTSC will be evaluating for potential inclusion on the Priority Products list.

### Comment Period

Friday, September 12, 2014 Pacific to  
Tuesday, October 21, 2014 5:00 PM Pacific

### Comments Published

246 [View](#)

### Documents

[Public Notice](#)  
[Sacramento Workshop Agenda](#)  
[Cypress Workshop Agenda](#)

### Regulatory Citation

Title 22, California Code of Regulations,  
§69503.4 (a)

### Documents:

You may make comments on the document(s) shown below by clicking on the "Submit Comments" button and corresponding document.

[Submit a Comment](#)

Date	Title	Type	Submitted By
September 12, 2014 Pacific	<a href="#">Draft Priority Product Work Plan</a>	Work Plan	DTSC

<https://cit.dtsc.ca.gov/scp/comments/commentslite/>





# Draft Priority Products Work Plan

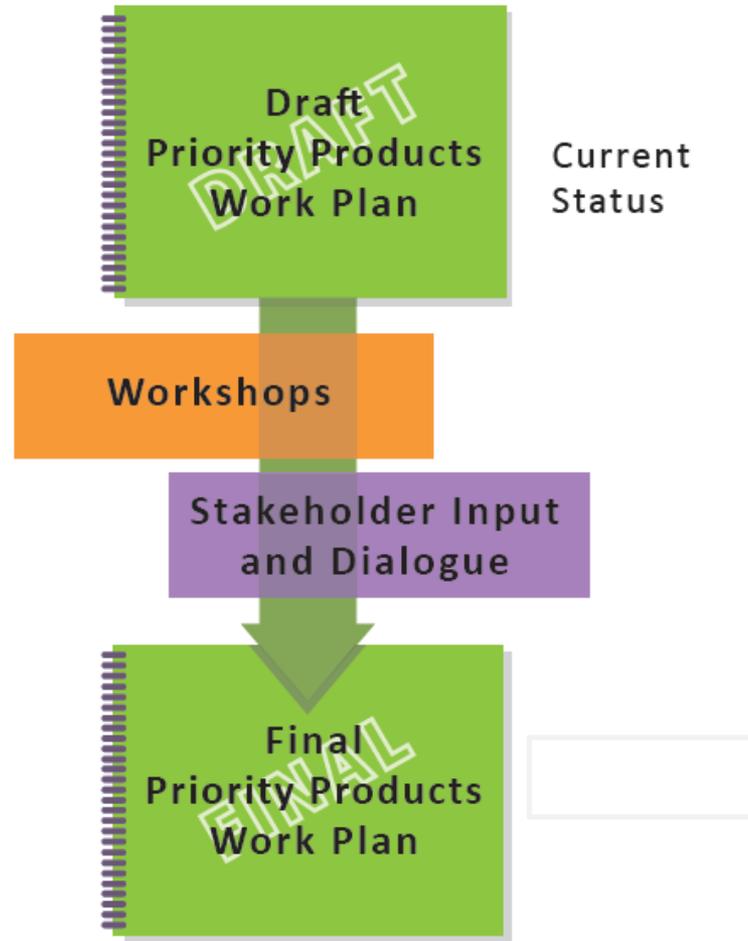


# Work Plan Objectives

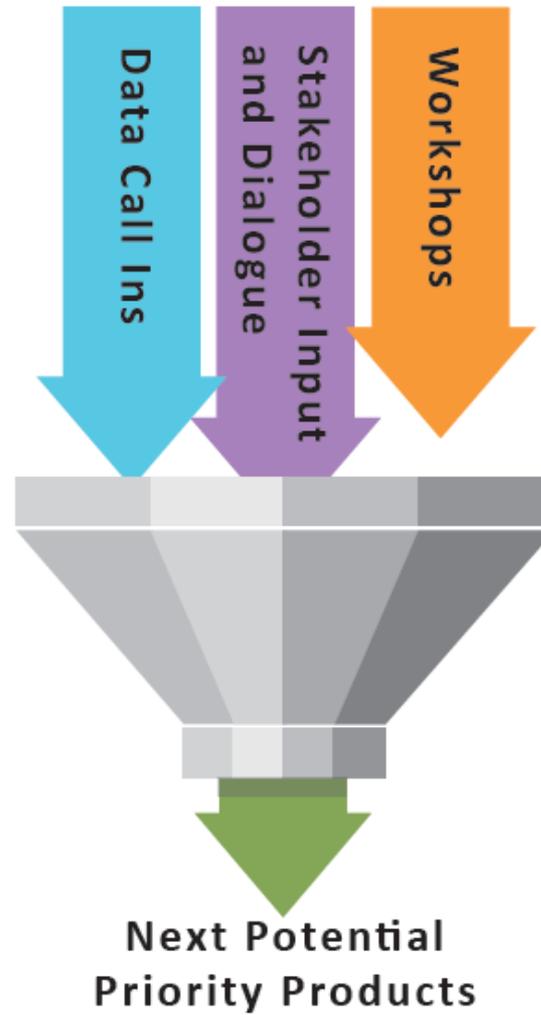
- Identify product *categories* for next 3 years
- Provide market signals
- Engage stakeholders, gather data, finalize the Work Plan...
- Then identify potential PPs



# Process of Priority Product Selection: Finalizing the Work Plan



# Process of Priority Product Selection: Executing the Work Plan



# Product Categories

- Aligned with Global Product Classification (GPC) system when possible
- Purpose: Clearly describe what is covered within a category
- Categories are the starting point for research and dialogue



GPC Segment

Lawn and  
Garden  
Supplies

**EXAMPLE**

Family

Lawn and  
Garden  
Supplies

Class

Hand Tools

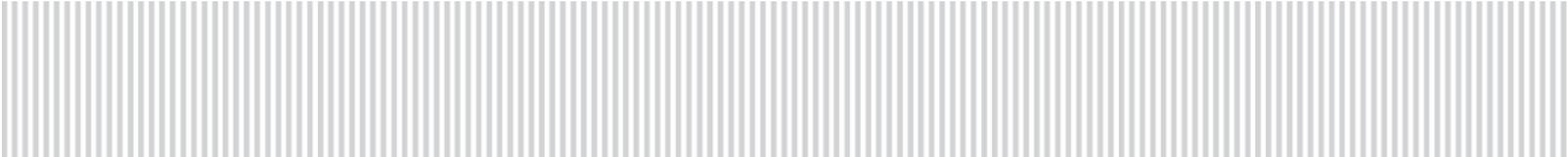
Furniture &  
Furnishings

Brick

Rakes

Hammocks

Garden  
Chairs



# Product Category Selection

- SCP Regulations factors and criteria
  - Candidate Chemical
  - Potential exposure
  - Potential for significant adverse impact, etc.
- No ranking system or algorithm
- Screening approaches:
  - Hazard trait and end points
  - Routes of exposure
  - Chemical prioritization
  - Evidence of Exposure
  - Sensitive Subpopulation
  - Functional Use
  - Existing research information

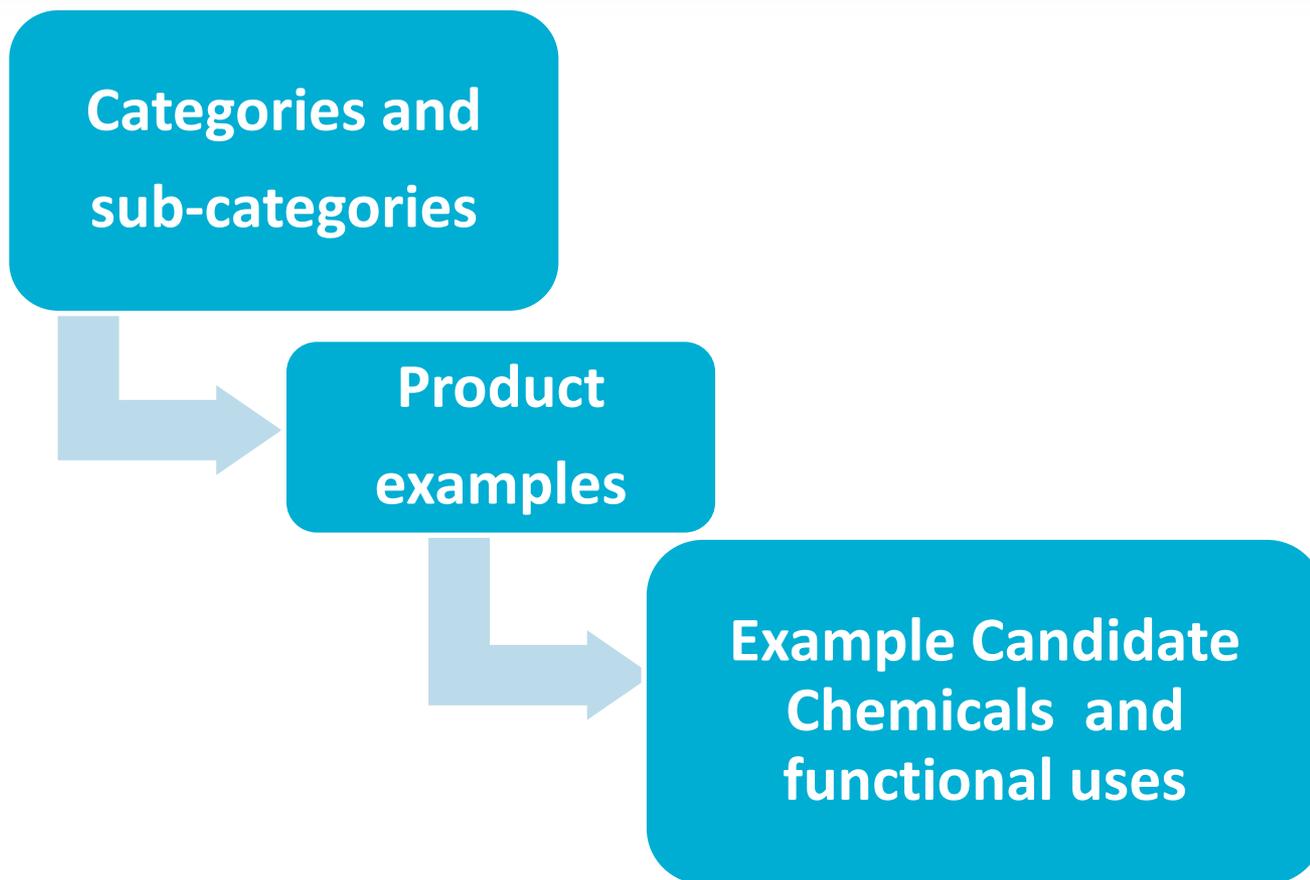


# Priorities for screening categories

- Dermal, ingestion, inhalation exposure pathways
- Biomonitoring results
- Chemicals in indoor air monitoring
- Impacts on children and workers
- Aquatic resource impacts
- Water quality monitoring evidence



# Structure of Work Plan Categories



# 7 Product Categories

- Beauty, Personal Care and Hygiene Products
- Building Products
- Household/Office Furniture/Furnishings
- Cleaning Products
- Clothing
- Fishing and Angling Equipment
- Office Machinery (Consumable Products)



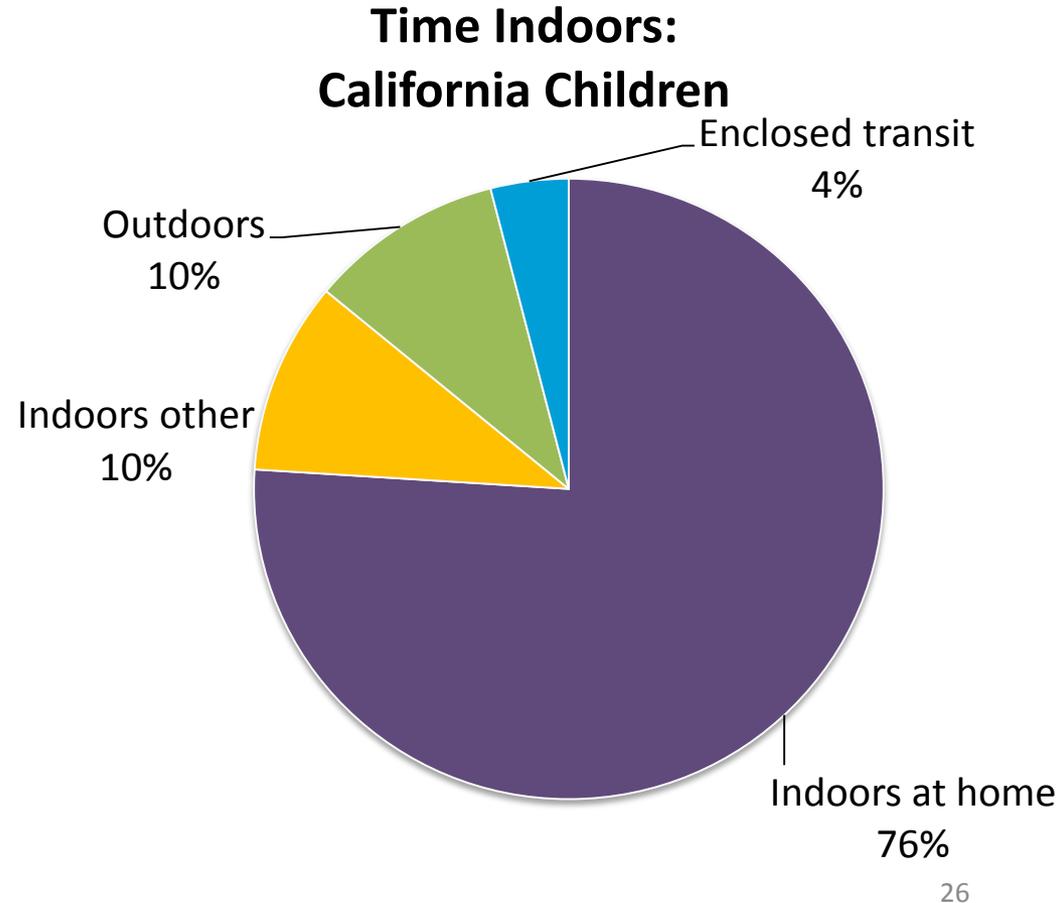
# Beauty, Personal Care and Hygiene

- Products are **applied directly to body**
- **Volume** and **Frequency** of use
- Ingredients are **not always disclosed**
- Biomonitoring
- Potential impacts on aquatic environment



# Building Products & Household/Office Furniture

- Direct pathways
  - inhalation of indoor air and ingestion of dusts
  - particularly by children
- Californians spend most of their time indoors



# Building Products and Household/Office Furniture

- Greater exposure and impacts on children
  - Susceptible during development
  - Respiratory sensitivity
  - Time on floors
  - Fingers and objects in mouths
- Clear evidence of chemical presence with biomonitoring and indoor air studies
- Potential Health Impacts:
  - Asthma
  - Cancer
  - Irritant effects



# Building Products

## ■ Subcategories:

- Paints
- Adhesives
- Sealants
- Flooring



# Household/Office Furniture

- Focus on specific classes of chemicals:
  - Flame retardants
  - Stain resistant chemicals (perfluorinated compounds)



# Cleaning Products

## ■ Pathways for Exposure:

- Inhalation – Dermal - Aquatic



## ■ Worker Exposure (US)

- 2.3 million custodial services workers
- 1.4 million work hotel/healthcare facilities maids

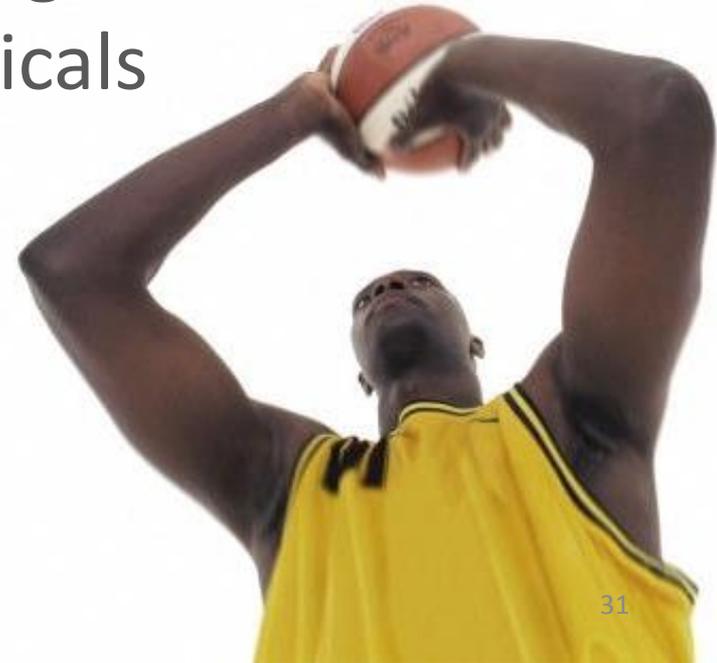
## ■ Hazard traits

- Dermatotoxicity, respiratory toxicity, carcinogenicity
- Work-related asthma



# Clothing – chemical treatments

- Color fastness, wrinkle/stain resistance, and water repellency
- Manufacturing and laundering wastewater can contain Candidate Chemicals
  - Toxic
  - Bioaccumulative
  - Persistent



# Fishing and Angling Equipment



- Significant amount of lead fishing weights may enter the environment each year
- Various states and countries already have restrictions

- Lead
  - Carcinogen, reproductive toxicant, neurotoxicant, and developmental toxicant
  - Persistent and bio-accumulative
- Sensitive species and ecosystems
- Water bird mortality well-documented



# Office Machinery (Consumable Products)

- Printer inks   ■ Specialty paper   ■ Toner cartridges
- Potential long term exposures for office and retail workers
- Life cycle concerns – downstream processing or disposal



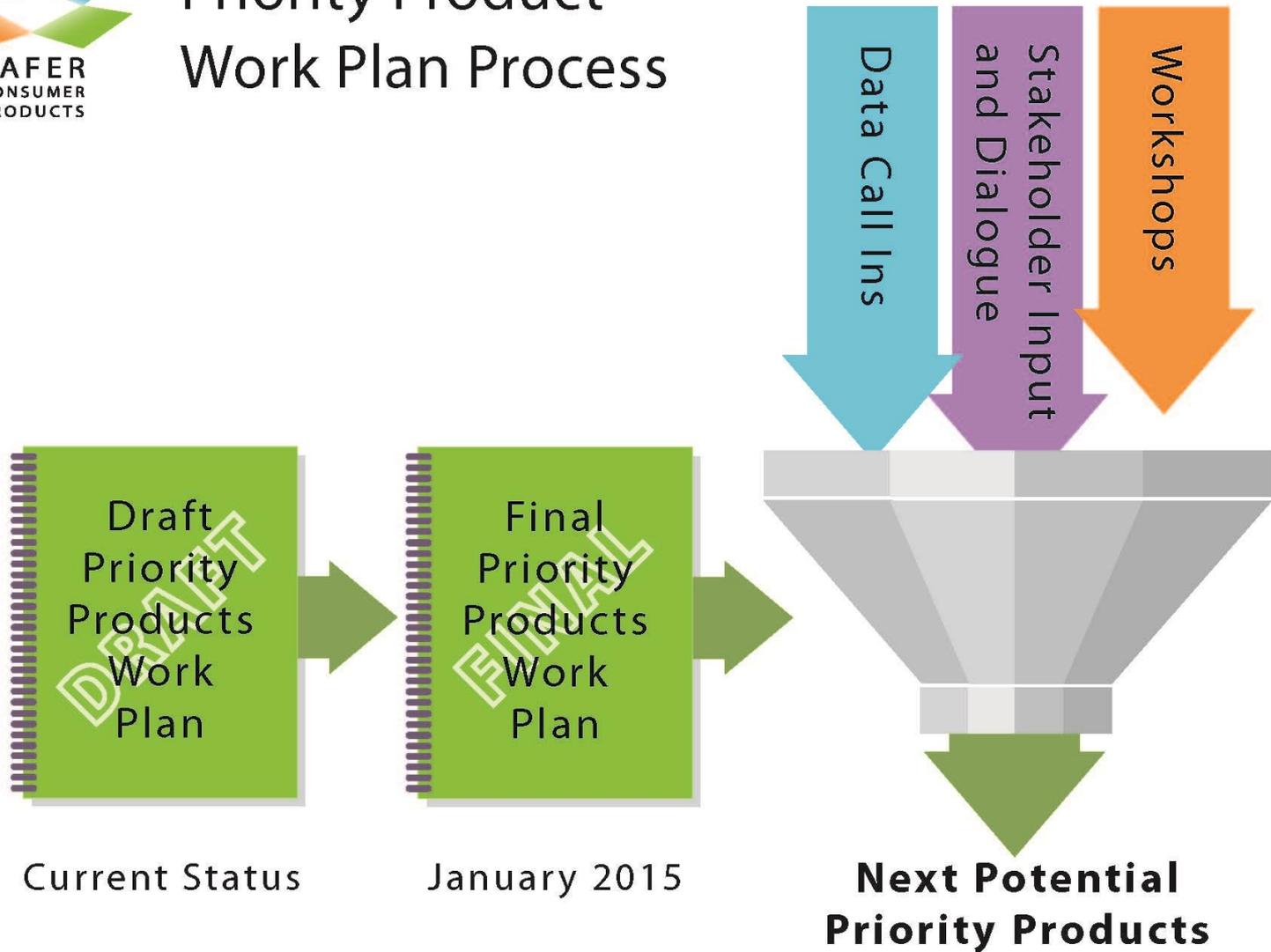
# Providing Input

- Informal Comment Period
  - September 12 through October 21
- Workshops Held
  - Sacramento September 25, 2014
  - Cypress September 29, 2014





# Priority Product Work Plan Process



# Comments, Questions and Information??

**[SaferConsumerProducts@dtsc.ca.gov](mailto:SaferConsumerProducts@dtsc.ca.gov)**

**<https://cit.dtsc.ca.gov/scp/comments/commentslite/>**

**<http://www.dtsc.ca.gov/SCP>**





# END OF PRESENTATION



Department of Toxic Substances Control



Cal/EPA