



Lowell Center for Sustainable Production

UNIVERSITY OF MASSACHUSETTS LOWELL

Alternatives Assessment 118 Webinar: Interstate Chemicals Clearinghouse Alternatives Assessment Guide



JANUARY 29, 2014

FACILITATED BY: JOEL TICKNER, SCD

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UMASS LOWELL**

** If you would like to ask a question or comment during this webinar please type your question in the Q&A box located in the control panel.*

Goals



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- Continuing education and dialog
- To advance the practice of alternatives assessment for informed substitution across federal, state, and local agencies through networking, sharing of experiences, development of common approaches, tools, datasets and frameworks, and creation of a community of practice.

Purpose of this call



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- The Interstate Chemicals Clearinghouse (IC2) has developed a guide to assist businesses and governments in evaluating alternatives to toxic chemicals in products.
- IC2's members have been collaborating on developing common definitions and best practices around the alternatives assessment process for several years.
- The Guide builds on alternatives assessment processes developed by the US EPA Design for Environment Program and other efforts.
- This webinar will present the guide, critiques and responses to them, and an initiative to evaluate the Guide's application.

Speakers



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- Alex Stone, Senior Chemist,
Washington Department of Ecology
- Terri Goldberg, Executive Director,
Northeast Waste Management Officials'
Association
- Topher Buck, IC2 Project Manager,
Northeast Waste Management Officials'
Association



Discussion Questions



- What are the key goals and elements of alternatives assessment as outlined in the Guide?
- How can the Guide be used by other government agencies and industry?
- What types of comments and critiques did IC2 receive and how have these been addressed in the guide?
- Are there plans to revise the guide based on the evaluation?



Webinar Discussion Instructions



- Due to the number of participants on the Webinar, all lines will be muted.
- If you wish to ask a question, please type your question in the Q&A box located in the drop down control panel at the top of the screen.
- All questions will be answered at the end of the presentations.

Interstate Chemicals Clearinghouse Alternatives Assessment Guide



Alex Stone
Guide Team Lead

Alternatives Assessment Webinar 118
29 January 2014

PROTECT YOUR CHILDREN Against Disease-Carrying Insects.



TRIMZ DDT CHILDREN'S ROOM WALLPAPER and Ceiling Paper

KILLS FLIES, MOSQUITOS, ANT
... as well as moths, bedbugs, silverfish and oth
household pests after contact!

MEDICAL SCIENCE KNOWS many common insects bre
in filth, live in filth and carry disease. Science also re
cognizes the dangers that are present when these diseas
carrying insects invade the home. Actual tests ha
proved that one fly can carry as many as 8,000,000 ba
teria! Imagine the health hazard—especially to ch
dren—from flies seriously suspected of transmitting su
diseases as scarlet fever, measles, typhoid, diarrhea
even dread polio! Some types of mosquitos carry mala
and yellow fever. And any mosquito bite is painful a
easily infected when scratched.

NON-HAZARDOUS to children or adults, to pets or cloth
Certified to be absolutely safe for home use. Tested a
commended by Parents' Magazine.

GUARANTEED effective against disease-carrying inse
for 1 year. Actual tests have proven the insect-killi
properties still effective after 2 years of use.

NO SPRAYS! NO LIQUIDS! NO POWDERS! So convenie
so safe because the DDT is fixed to the paper. It ca
rub off!

BEAUTIFUL! "Jack and Jill" or "Disney Favorites"—g
new patterns that protect as they beautify a child's roo
DDT CEILING PAPERS, TOO! Extra protection for your ch
dren's room—for every other room in the house. Cho
of two tints.

TESTED AND
COMMENDED
by
PARENTS'
MAGAZINE
CONSUMER
SERVICE
BUREAU

READY-PASTED! Just Dip in Water and Hang!

Anyone can put Trimz Wallpaper up without help or previous
experience. Millions have done it—proved it's quick, clean,
easy! Nothing to get ready—no tools, paste or muss. Just cut
strips to fit, dip in water and hang. It's dry in 20 minutes!
Guaranteed to stick—guaranteed to please or money back. And
so **INEXPENSIVE!** You can protect your child for \$8 to \$12—
depending on size of room.

Trimz DDT Children's Room Wallpaper, Trimz DDT Cedar
Chest Wallpaper now available at Department, Chain, Hard-
ware, Paint, and Wallpaper stores everywhere.

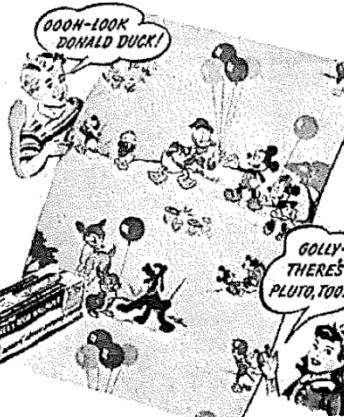
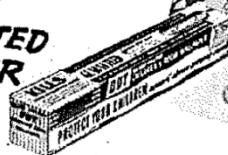
Many beautiful new patterns also available in regular Trimz Ready-
Pasted Wallpaper at \$1.98, \$2.49, \$2.99 per box.



Just Dip in Water
and Apply

TRIMZ READY-PASTED WALLPAPER

Another Product of TRIMZ CO., INC., Division of UNITED WALLPAPER



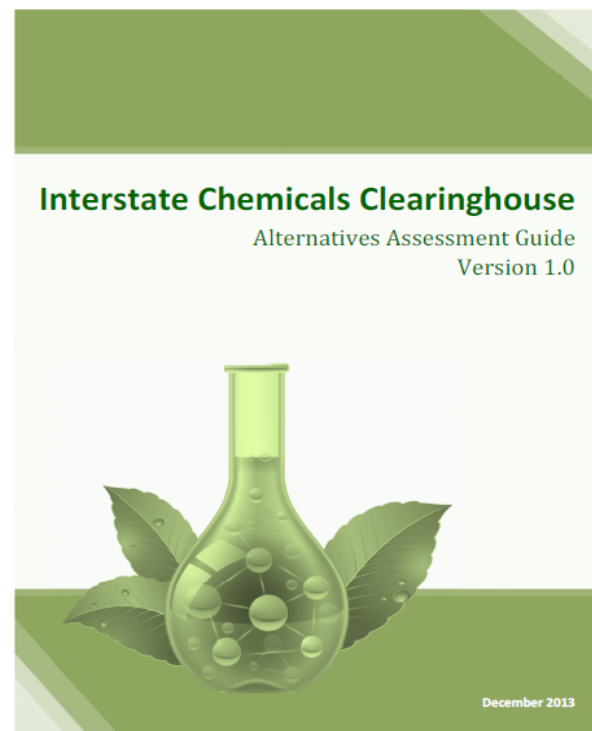
Why an AA Guide?

Non-hazardous to
children or adults, to
pets or cloth. *Certified*
to be absolutely safe
for home use. Tested
and recommended by
Parents' Magazine.

Oooh-Look Donald Duck!
Golly-There's Pluto too!

Alternatives Assessment Background

- \$150K EPA seed funding to develop AA guide
- Eight IC2 member states (CA, CT, MA, MI, MN, NY, OR, WA) worked together for over two years
- Completed Guide released on January 8th
- Included 2 response-to-comment documents
 1. Word summary
 2. Excel spreadsheet with all comments and grouping



IC2 AA Guide

Pollution
Prevention

Mercury

IMERC

Solid
Waste

Hazardous
Waste

Waste Site
Cleanup

ERP

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ALTERNATIVES ASSESSMENT GUIDE

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
[Pollution Prevention & Sustainability](#) ▶ [IC2](#) ▶ Guidance for Alternatives Assessment and Risk Reduction

IC2 Alternatives Assessment Guide

On January 8, 2014, the Interstate Chemicals Clearinghouse (IC2) and participating states [announced](#) the release of the [IC2 Alternatives Assessment Guide \(Guide\)](#). The *Guide* is the product of 20 months of effort by IC2's members.

An alternatives assessment is a set of tools that manufacturers, product designers, businesses, governments, and other interested parties can use to make better, more informed decisions about the use of toxic chemicals in their products or processes. The IC2 collaborated with businesses and non-governmental organizations on the development of the *Guide*.

In addition to the *Guide*, the IC2 is releasing two Response-to-Comment (RTC) documents. The [summary RTC document](#) groups comments received and documents how the *Guide* was either updated or not altered based upon input received. The [detailed RTC document](#) contains a response to each individual comment.

The responses in both RTC documents are identical; the full comments are available only in the detailed document. Comments received throughout the development of the *Guide* are [available](#) .

The IC2 understands the benefits of consistency in alternatives assessments but recognizes that one approach will not work in all situations. The *Guide* was designed to be very comprehensive and includes three ways in which an alternatives assessment can be conducted.

The *Guide* was created with an extensive stakeholder involvement process, including:

- Initial scoping of the project
- Release of the modules as they were completed for review and comment
- Three industry workshops
- Two free webinars
- A 60-day comment period

All comments were summarized in the RTC documents.

For questions concerning the *Guide*, contact Dr. Alex Stone, Team Lead, (360) 407-6758; alex.stone@ecy.wa.gov.



Interstate Chemicals Clearinghouse

**Alternatives Assessment Guide
Response to Comments**

December 2013

<http://www.newmoa.org/prevention/ic2/aaguidance.cfm>

Alternatives Assessment Guide

Changes from draft version

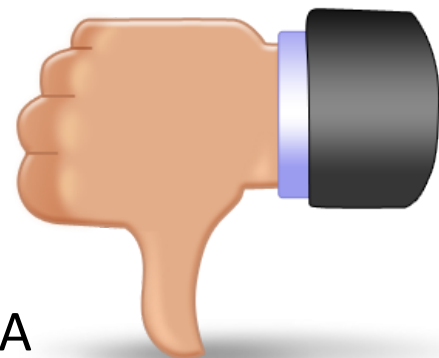
- Changed name
- Extensive edits and condensing
 - Reduced from 249 to 176 pages
- Simplified process
- Increased clarity
- Added section of example alternatives assessments
- Expanded on tools available to help with process



Alternatives Assessment Guide

Input not accepted

- Emphasis on exposure and 'risk'
 - Guide is risk based
 - Objective of AA is to replace toxic chemical, not RA
- No steps to address Confidential Business Info.
 - Outside of scope of Guide
 - Responsibility of politicians to decide where CBI intersects with consumer right to know
- Important components missing (e.g., consumer acceptance)
 - Consumers expect governments to monitor products to make sure they are safe and AA part of this process
- Lack of business involvement in process
 - Stakeholder process above and beyond what is standard



Guide Components

AA consists of five distinct steps

1. Identify COCs

2. Initial Evaluation

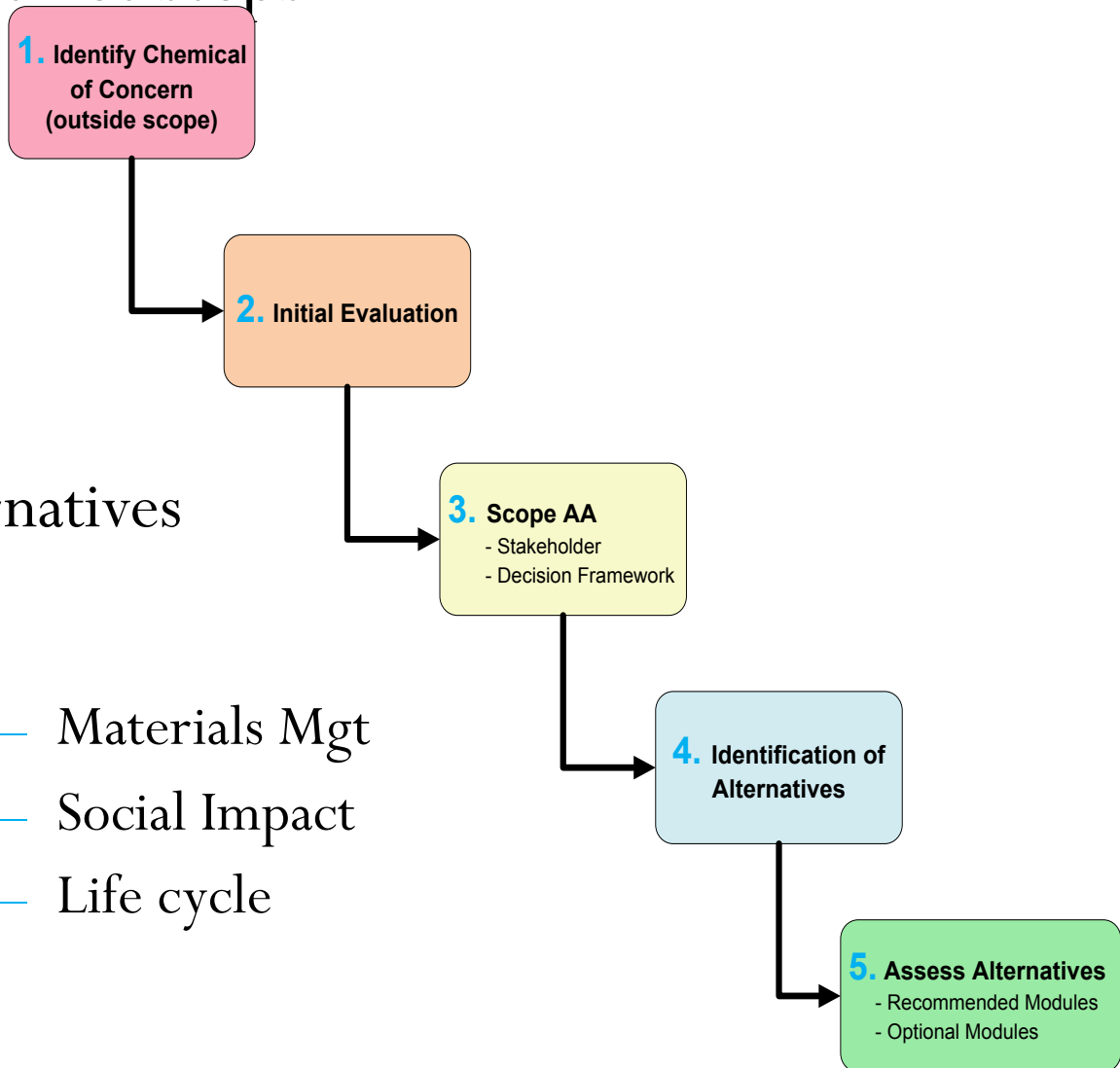
3. Scoping

- Stakeholder
- Decision Framework

4. Identification of Alternatives

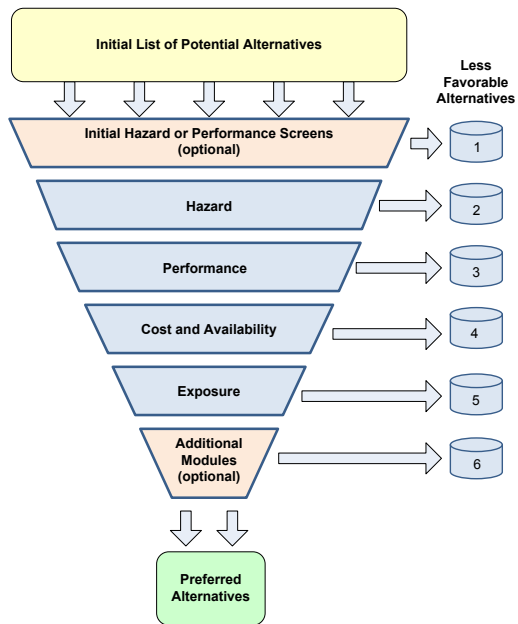
5. Assess Alternatives

- | | |
|-----------------------|-----------------|
| – Hazard | – Materials Mgt |
| – Performance | – Social Impact |
| – Cost & Availability | – Life cycle |
| – Exposure | |

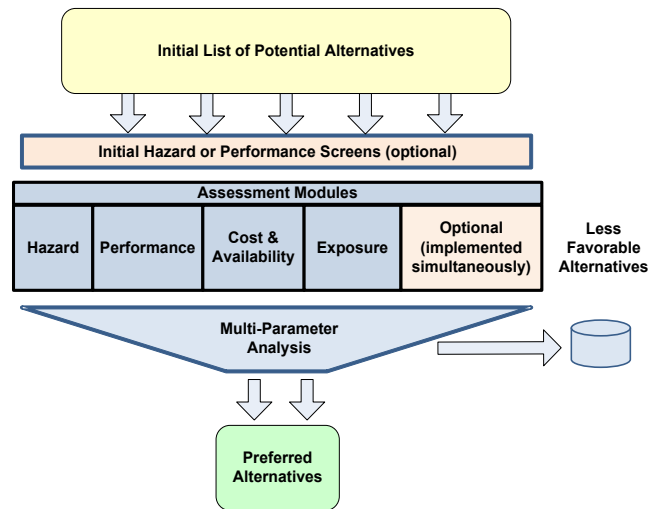


Frameworks

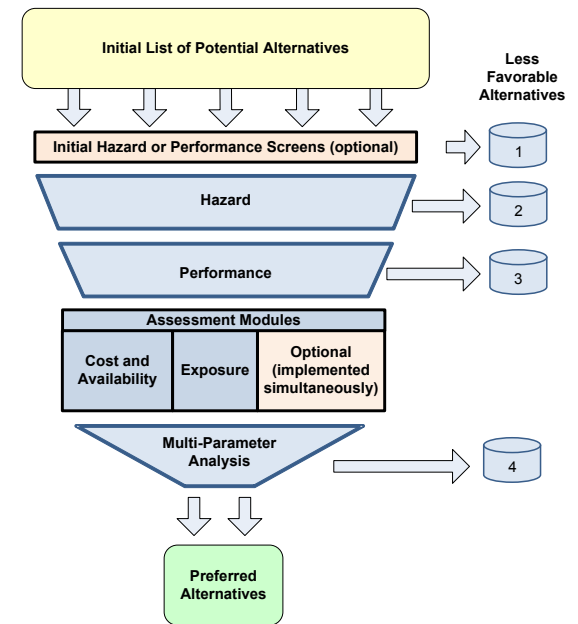
Sequential



Simultaneous



Hybrid



How may Guide be used?

- By state and other governments to decide what comprises an adequate AA
 - Individual states may recommend or require different components of Guide. All will have same foundation.
 - Bring consistency among IC2 states conducting AAs.
- On a voluntary basis with businesses as part of pollution prevention efforts.
- Scientific Groups to support AA work.
- By businesses to determine what constitutes an adequate AA for their product and process under evaluation while meeting company goals and objectives.



How may Guide be used? (cont.)

- By Federal Government?
 - Support Federal efforts on AAs (DfE)
 - Emphasize importance of safer products (DfE safer products and green list)
 - Emphasize importance of worker health and safety component (OSHA)
 - Coordinate activities with state actions
 - Support and provide assistance to states conducting AAs
 - Other ideas?????



Guide Evaluation

- \$ from EPA to evaluate Guide
- Contract to conduct AA using three frameworks and common dataset
- Will use data from EPA evaluation of alternatives to copper boat paint
- Emphasis will be whether Guide provides enough detail to allow assessor to conduct an AA



Guide Evaluation (cont.)

Outline of Evaluation

– Four primary actions

1. Create common data set:

- From EPA and CA documents on copper boat paint alternatives, collate data on performance, cost and exposure.
- Conduct Chemical Hazard Assessment of alternatives.
 - Prioritization scheme based upon amounts and using a combination of List Translator, QCAT & GreenScreens.
 - CHA results will become part of common data set
- Provide common data set to groups conducting alternatives assessments



Guide Evaluation (cont.)

Outline of Evaluation

— Four primary actions (cont.)

2. Conduct alternatives assessments using common data set and Sequential Framework
3. Conduct alternatives assessments using common data set and Simultaneous Framework
4. Conduct alternatives assessments using common data set and Hybrid Framework

Note: should be three separate groups so work on one Framework does not affect results of another



Guide Evaluation (cont.)

What the evaluation **WILL** do:

- Determine if there is sufficient guidance in the Guide to conduct AAs using the three frameworks.
- Provide input on what sections if any need additional information.
- Determine if the Guide is ‘user-friendly’ for wide range of intended users
- Compare results to see if the same conclusion is reached from all three Frameworks and, if not, suggest reasons for differences.
- Provide information on alternatives to copper boat paint that can be used to start a more complete AA process including stakeholder involvement.



Guide Evaluation (cont.)

What the evaluation **WILL NOT** do:

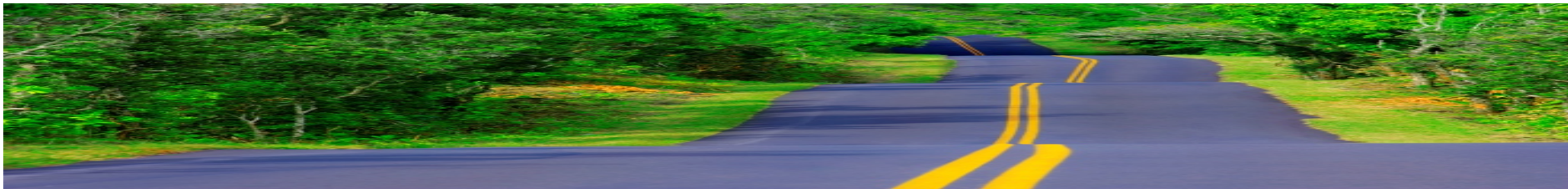
- Make changes to content of the Guide.
- Although information on alternatives to copper boat paint are informative, objective is to evaluate the usability of the Guide, not to conduct an AA.
- Initiate further stakeholder input into content or structure of the Guide

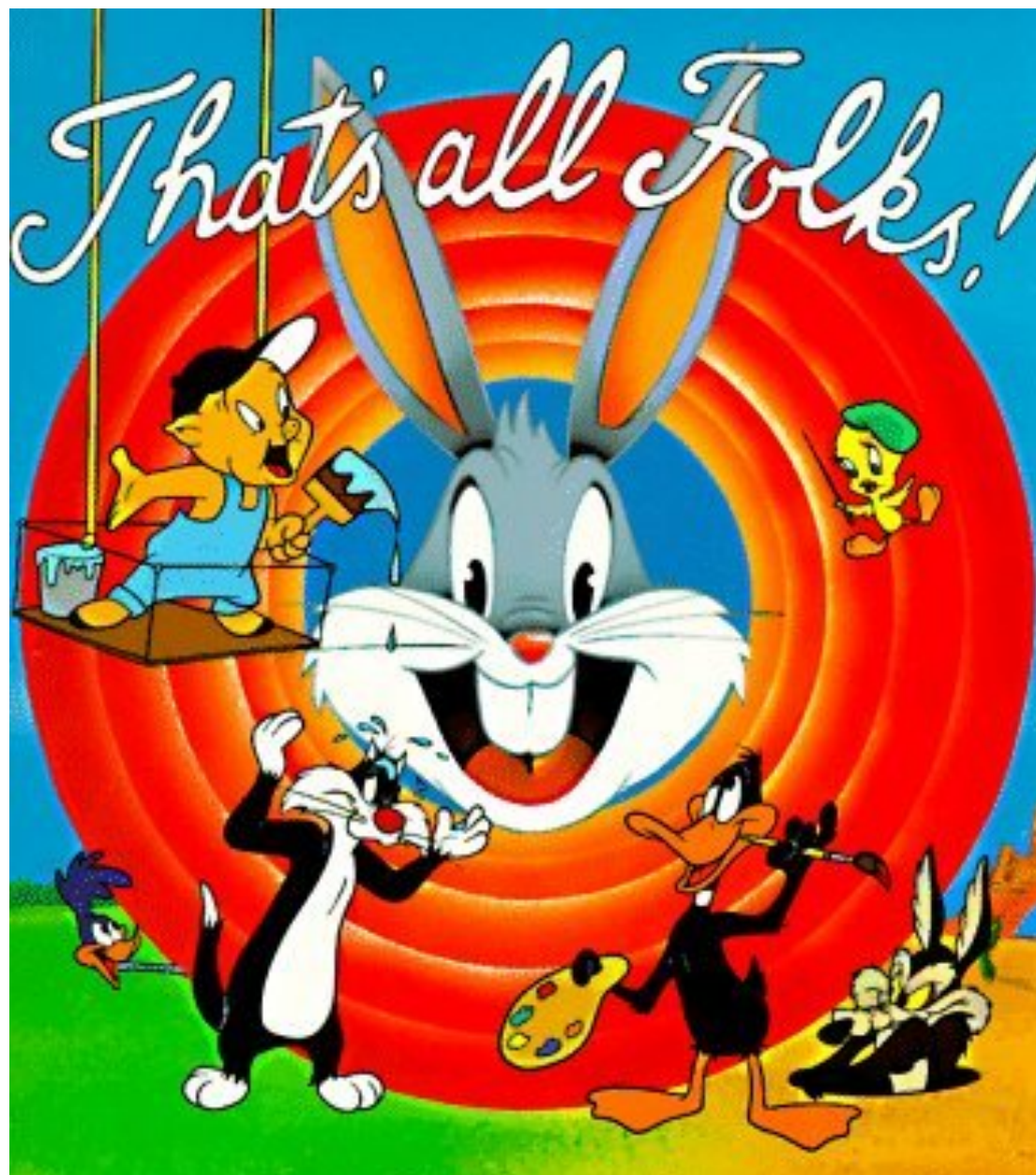


Alternatives Assessment Guide (cont.)

Status:

- RFP in draft and being reviewed.
- Tentative release in February.
- 60 days to provide proposals to RFP.
- 6 months to conduct work and write final report.
- Completion end of 2014.





Contact

Alex Stone

Washington State Department of Ecology

Alex.Stone@ecy.wa.gov

(360) 407-6758





Discussion Questions



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- How can the Guide be used by other government agencies and industry?
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Next Webinars



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Alternatives Assessment 119: The Role of Alternatives Assessment in Chemical Accident Prevention

Wednesday, March 12, 2014

12pm EST/9am PST

- Dr. Nicholas Ashford, MIT
- Dr. Gerald Poje, Former Board Member Chemical Safety and Hazard Investigation Board

Alternatives Assessment 120: Alternatives Assessment for Engineered Nanoparticles

Friday, March 21, 2014

12pm EST/9am PST

- Molly Jacobs, Lowell Center for Sustainable production
- Dr. Jennifer Sass, Natural Resources Defense Council
- Dr. Lauren Heine, Clean Production Action



Webinar Audio & Slides



The audio recording and slides shown during this presentation will be available at:

[http://www.chemicalspolicy.org/
alternativesassessment.webinarseries.php](http://www.chemicalspolicy.org/alternativesassessment.webinarseries.php)