

Update on Alternative Analysis Guidance Development

Presentation to the BizNGO annual meeting
December 9, 2014



California
Environmental
Protection Agency



Department of
Toxic Substances
Control



Past to present

3 AA symposia in 2010

Tools workshop Oct 2012

Engaged alternatives assessment community

- IC2 AA guide development
- OECD Meta Study and toolbox development
- BizNGO AA studies
- DfE, OSHA, HESI, ASTM



SCP Implementation Timeline

| 2014 | | | | 2015 | | | |
|---|--|--|-----------------|------|--|----------------------------------|--|
| March | | | Oct | | | | |
| propose priority products | | | 3yr workplan | | | Adoption of Priority Products | |
| Alternatives Analysis Guide Development | | | | | | | |





2015

Conduct webinars in spring

- Provide the draft guide for public comment

Hold workshop in fall

- Focus on tools/methods and approaches

Conduct a pilot AA effort

- To refine the guide and provide a case study



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2015 and beyond

Conduct trainings in late fall

- EPA tools
- GreenScreen
- Exposure modeling
- Life cycle thinking

Workshops on each step

Assist those conducting AA's



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Guidance- Key considerations

The regulations provide a framework, steps, what needs to be considered for AA and reporting requirements.

- Only the Reg's are enforceable
- Guidance is assistance to meet Reg standards



Guidance- Key considerations

AA's will inform:

- Regulated entity's decisions
- DTSC's regulatory response

Large entities will likely follow their own R&D/product development protocol

- Guidance is focused on SME
- Assume capabilities to perform





Guide approach

The guide will:

- Follow the regulatory requirements
- Be flexible – recognize multiple methodologies
- List tools/methods/approaches, data sources and examples for conducting each step
- Not provide thresholds or criteria
- Consider different methods for formulated versus articles
- Be a living document



Guide Status

Team members are drafting chapters

Team:

Nancy Ostrom

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Xiaoying Zhou

others

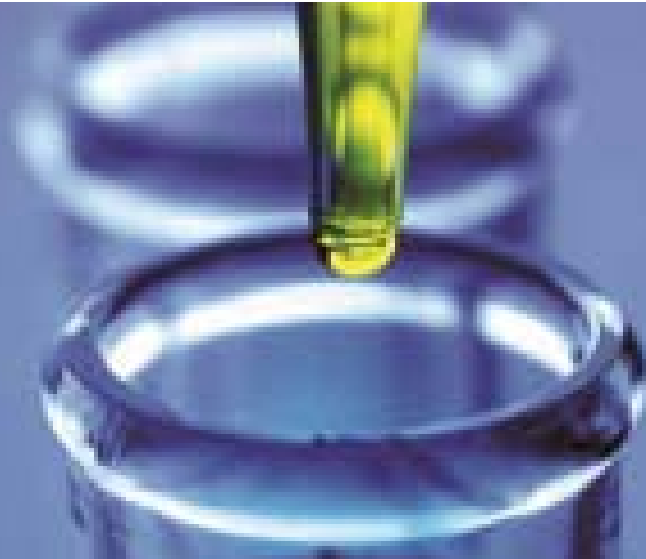
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