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Interstate Chemicals Clearinghouse (IC2)
Washington Department of Ecology
Hazardous Waste & Toxics Reduction-HQ
PO Box 47600
Olympia, WA 98504-7600

May 3, 2013

Dear IC2,

On behalf of the National Wildlife Federation, I am submitting comments on the draft IC2 Guidance for Alternatives Assessment and Risk Reduction. We appreciate the efforts that have gone into the guidance, and the opportunity to comment. My comments are focused on the relationships between the modules involved in the alternatives assessment process.

In general, it makes sound sense to utilize individual modules for the various components of the alternatives assessment process, and it also makes sense to group modules into scoping and assessment modules (e.g. p. 20). I do have a few questions/concerns on the flow of the process, both in regards to the text, and figures included in the draft document, as follows:

1. The document identifies four scoping modules (Initial Evaluation, Identification of Alternatives, Decision, and Stakeholder) (e.g. pp. 21-22). However, Figure 4-1 on p. 25 for the Scoping phase shows the first two modules (in light blue boxes), and then the decision module is presumably at the bottom (with the three options for the decision framework). If this interpretation is correct, it might be helpful if all three boxes collectively were given a Decision module label (e.g., with a bracket to the side).
2. For the same figure, it is not clear where the Stakeholder module fits in; presumably it would be in this process, because it is grouped with the scoping modules. It would be helpful if the stakeholder module were specifically identified in the figure, or alternatively, if text were added to explain its relationship to the other modules in the figure.
3. For the same figure, there is a light blue box on the right "Conduct pre-screening using Performance & Hazard Modules". These modules would be considered assessment modules, as per discussion earlier (e.g. p. 20, p. 220). However, at the bottom of the figure, the three decision boxes would lead to one of three different decision frameworks, each of which has a performance and hazard module embedded within them. So it is confusing why those modules would appear twice in the process. The term "pre-screening" or "prescreening" does not apparently appear elsewhere in the document, though both Figure 4-2 and Figure XX have a first step identified as "Initial Performance

and/or Hazard Screens (Optional).” Given that in the decision frameworks, these initial steps are followed immediately by performance and hazard modules, it is not clear how the initial evaluation/pre-screening is different from the formal screening. This should be clarified.

4. For several of the figures (e.g. Figure 4-2, Figure XX), there are boxes for “Optional Modules” which are presumably the Materials Management, Social Impact, and Life cycle Thinking Modules identified earlier (e.g. p. 23). Some identifier as such should be added, either in the main text, the figures, or both.
5. In general, it would be helpful to clarify in the document the relationship between the scoping and assessment modules – i.e., whether some of the assessment modules fall within the scoping process, or generally (or always) follow the process; this issue is obviously related to my question above on “pre-screening”.
6. On a more minor point, concerning the sequence for assessment modules, the text (e.g. p. 22), has hazard as the 2nd module, and exposure as the 4th, but in Figure 4-2 (p. 27), the hazard module is immediately followed by the exposure module. The latter sequence makes sense to me, so you may want to consider reorganizing the modules in the text to be consistent with that sequence.

Finally, concerning the discussion on the GreenScreen tool, and the table showing grouping of alternatives (Table 6b-4, p. 59), it would be helpful to also use the identifiers “Benchmark 1”, “Benchmark 2”, etc. as well as the colors, because my understanding is that those are common narrative identifiers for the different chemical groups identified through the GreenScreen process; of course, I would defer to the judgment of GreenScreen developers on that recommendation.

Thank you for the opportunity to provide input on the draft IC2 Guidance for Alternatives Assessment and Risk Reduction, and feel free to contact me with any questions on these comments.

Sincerely,



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