

Stakeholder Scoping Questions:

1. What are your three main observations with the continuum process proposed by Ecology?

I think the continuum process is an excellent idea. The simple screening tools are good for routine cleaning products and most architectural paint. For most industrial uses, they are rather inadequate. Unfortunately, a full LCA is cost prohibitive for most products or organizations. It is the middle of the spectrum where I see the greatest need.

It would be best to develop a criterion referenced process.

2. Has Ecology omitted any technical concerns as important components of the guidance continuum?

Endocrine disruption seems like a potentially valid criterion. The difficulty would be in establishing a level of activity that poses a concern.

One difficulty is that some materials might be of great concern in one application and little concern in another. Crystalline silica may be fine in an exterior, low VOC paint and a terrible idea for blasting. Basing an evaluation solely on the chemicals involved is difficult. MPI rates paints by intended use and the standard for what is green varies by intended use (a different type of continuum). A product that is completely inappropriate for a cleaner or office product may be the most environmentally preferable option for an electrical contact cleaner. A simpler system is ideal, but how to make a simple system with the inherent complexities of industrial uses is quite difficult.

3. What are some of the positives this process might bring?

A number of organizations have different tools for screening or approving products. While I see value in having Greenwise for paint and CRI green for carpet, it is very difficult for the public in general to evaluate the myriad of different approval systems. Adding in the approvals that lack credibility muddies the water further. Having a system for alternatives with a credible body behind it should be beneficial and serve as a standard approach. DfE has been a good example of an approval that has inherent credibility. For purchasing, we have taken to evaluating approval systems and allowing for certain approvals to meet our standards (e.g. any GreenSeal approved cleaning products).

Over the counter commercial products have a large number of certifications to aid consumers. Industrial products (degreasers, corrosion protective paints, etc.) do not have nearly as many credible environmentally preferable certifications. This seems to be the best place to focus energy for alternatives. The Massachusetts TURI alternatives has a good scheme. Ideally, a database where one could search for alternatives to a current product would be very useful. The difficulty is in determining the fields that would be necessary. Replacing 1,1,1 – trichloroethane may be relatively straightforward.

Replacing a product that contains a small amount of hexavalent chromium may be more difficult.

4. Do you have any other concerns with the proposed process?

For environmental toxicity, US Fish and Wildlife research indicates that the endangered species in our area (e.g. bull trout) respond to lower levels of contaminants than the standard species tested for product environmental toxicology. This adds a difficulty to the process. Another problem from an environmental review would be for copper. We are quite concerned about using copper containing products due to the toxicity to salmon. The same concern would be lessened if the product were used in West Texas.

5. Do you agree that the continuum approach is the best way to approach the various needs of an alternative assessment?

I do not know of a better approach. It may be possible to steer people to different levels in the continuum based on the intended use. Janitorial cleaners could be simple, corrosion resistant paint for immersed steel in a hydroelectric turbine would require much more performance data. Comparing recycled motor oil to biobased motor oil could require a full LCA.

6. Given the aggressive timeline, which of the components listed above are most important to be tackled first?

While the system we use predates both the Green Screen and QCAT, the general format is similar to the Green Screen. I think that any of the components would be valuable and would support the use of the Green Screen as a part of the continuum.

7. The stakeholder group will have the opportunity to provide additional input once the draft guidance framework has been formed, midpoint and before the guidance is finalized. Do you have any additional input to provide before the states begin discussing the guidance document?

I conduct chemical evaluations on a regular basis (3 in the past week). It is likely that I would be an end user of any system that is developed. I would be happy to be of any assistance.

One of the problems that I deal with is keeping up with the latest research. Evaluations of products with chemicals that are relatively new to me require checking multiple resources (Prop 65, NTP, IARC, ISTAS, AOEC, etc.). It is time consuming. A database that could yield this data quickly with the input of a CAS number would be quite helpful.