

**From:** Tom Carter [mailto:tomc@thewerco.com]  
**Sent:** Friday, September 09, 2011 4:17 AM  
**To:** Glasier, Linda (ECY)  
**Cc:** Ned Mataraso  
**Subject:** RE: Potential Stakeholders

Linda...Attached are input from our organization regarding the questions found in the DRAFT SCOPE FOR ALTERNATIVE ASSESSMENT GUIDANCE.pdf document. I hope this proves helpful.

Tom

1. What are your three main observations with the continuum process proposed by Ecology?
  - a. *The continuum process appears to be the correct approach considering the broad range of businesses, and the scale and scope of needs, as well as the practicality and costs that companies are prepared to incur. There is a lot of additional value to the continuum approach by providing in one place the ability for you to:*
    - i. *See where your existing programs fall in the continuum, so you can evaluate whether you have done the right groundwork (such as full hazard-spectrum screening) and what the next steps might be. Issues identified years ago that led to well-developed current improvement programs might not have addressed hazards that are now made visible by this approach.*
    - ii. *Recognize that you may already have multiple internal programs at several different steps of the continuum, and see how to integrate them and leverage what has been learned to move to the next level.*
    - iii. *Discover that extensive, possibly high-quality work that has been done to address a high-profile issue or product line might have overshadowed less apparent issues in that product line or in others.*
  - b. *Chemical Hazard assessment is the foundation for any alternative assessment. This can be accomplished efficiently and cost effectively through automation tools. When you extend the "categorized endpoint" approach made familiar by hazard communication and transportation regulations to the less familiar aspects of alternative assessment like degradation products and endpoints like immune system and endocrine effects, they become more visible and understandable. And the ability to automate the evaluation of the available data and the roll-up of the endpoints is essential. You may be able to do a very good customized manual job for a specific issue for a small number of related products, but it is cost and time prohibitive to cover all the relevant issues for all the chemicals in all the products of even a small company manually. A prime focus of this guidance should be to develop standardized approaches that can be readily automated with tools already available so that they can be run on the product data companies*

*already have – so they do not have to start from scratch. This would also facilitate migration up the continuum – each step can build on the previous one without needing a huge investment of start-up time and cost.*

- c. Full life cycle analysis can be cost prohibitive and impractical for a broad range of organizations and supply chains. These processes can sometimes ignore known hazards and focus on topics such as carbon footprint etc, and potentially ignore hazards associated with toxic chemicals.*
  - d. While all steps of the continuum have value and are applicable to certain issues, presenting this guidance as a “big picture” that shows how the steps relate to each other will be a huge benefit. It is not obvious when you see how many programs and methods and tools are out there that they do not all do the same thing. The ability to drill down into the various steps for more info will give a “one-stop shopping” resource that will allow many companies to get involved or expand their programs much faster than doing the research on their own.*
2. Has Ecology omitted any technical concerns as important components of the guidance continuum?
- a. While this guidance will unquestionably help, the biggest difficulty in hazard evaluation always comes back to the data. The following are often barriers to small companies, and burdensome to large ones. It will greatly help if guidance or resources can be identified or developed to help in:
    - i. Finding the available data
    - ii. Selecting or ranking multiple data available for the same endpoint - especially if they are not close in value.
    - iii. Determining the category of endpoints for which simple data is not usually found in tables.
    - iv. Applying “professional judgement” or obtaining SAR estimations.
    - v. Making sure you are in the same ballpark as your competitors – if nobody can agree on what the hazards of a particular chemical are, the whole process lacks credibility.
    - vi. The creation of “harmonized” data resources for endpoints being added for alternatives assessment. The creation of such resources for GHS endpoints by Europe, Japan, and others goes a VERY long way towards easing these issues. An example would be a list of known breakdown products for chemicals, or known alternatives – such list could be treated as “data” and allow automated

approaches to be much more effective. It would be understood that they would not be complete, but it's a place to start.

- b. At each step of the guidance, appropriate available resources could be listed (with links) at three levels:
    - i. Do it yourself – free programs for those with limited resources or wanting to do a pilot study to build a business case for a larger effort.
    - ii. Commercial packages – more features for larger companies
    - iii. Services/consultants - for those who want someone to do it for them.
    - iv. Any vetting or registration for these resources that the process could provide would be a huge assistance and an incentive to get started.
  - c. Include, wherever possible, actual examples or links to them, that can be opened for a tangible sense of how this step worked for someone.
3. What are some of the positives this process might bring?
- a. *Provides full spectrum of guidance on driving safer chemistry for companies small and large with the impact of systematically identifying and removing toxic chemicals of concern, while finding safer alternatives.*
  - b. *Making the process less overwhelming – giving you a cost-effective place to start. If you lessen the barriers, more will enter.*
  - c. *Encouraging those with existing processes to evaluate them - continuous improvement is necessary as new issues are discovered, and new technologies developed.*
  - d. *Standardization will lead to automation which will lead to lower costs and more actual chemical replacement. It is extremely difficult to comply with a regulatory environment in which each state does its own thing. If this process can result in multiple states all agreeing to do things the same way you will have greatly increased compliance and a much more cooperative regulated community. It is a huge source of waste to have to keep repeating a process according to different rules just to please everyone.*
4. Do you have any other concerns with the proposed process?
- a. *Where does the true leverage and motivation come from for manufacturers to remove toxic chemicals of concern from products?*
  - b. *How does this get promoted/marketed? Will a certification program be established so companies can claim credit for being involved? Or a certification/training program for consultants so companies can have some expectation of competence over such a wide range of programs?*

- c. *Will state specific government procurement; make such a proposed process a requirement for purchasing? In other words will the states “walk the talk”? At what point in the continuum will the states walk this talk...ie. Full Life Analysis on all procured products seems impractical, however does it make sense that at minimum an automated hazard assessment with criteria be performed in a cost effective automated approach prior to state purchase of products?*
- 5. Do you agree that the continuum approach is the best way to approach the various needs of an alternative assessment?
  - a. Yes. There is no one right process or “step” that covers all situations in all fields and products. If you make it simple and visible what the steps are, what they get you and how to do it, companies are more likely to at least explore it and put something in place. You will at least have reduced the confusion barrier. There will be increasing pressure from the public and from their customers to do so. If you add the fact that it is supported by multiple states – that becomes a powerful reason to enter the process. The hope is that other states will join once they see some momentum building.
- 6. Given the aggressive timeline, which of the components listed above are most important to be tackled first?
  - a. Make at least a first cut at outlining the continuum. Identify the bulk of the steps, and pull and distill available descriptions of them. Block out within these steps, or link to them, the various components you identify at the end of the draft scope document, and any identifiable resources (ideally at the three levels noted above – DIY, featured, and services/consultants). Accomplishing this alone would help right away for understanding and allow more focused efforts on content. Don’t wait until it is completed to have it out there for feedback and input. If any new resources will be developed, identify them early and ask for experts and beta-testers. If people see where you are going early on, they may be inclined to get more involved or at least offer their experiences.
  - b. Start building out the lowest level with some detail and resources. Early on this may help get companies into the program – even if they already have a program. Here you will identify a lot of issues they might not have considered before – incentive to consider more advanced steps for at least a few of their products..
  - c. Identify experts for the rest of it and start building it out. Consider a Wiki – type approach – multiple contributors with expert/regulatory oversight.



Worldwide Environmental Regulatory Compliance Systems

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**From:** Glasier, Linda (ECY) [mailto:lgla461@ECY.WA.GOV]  
**Sent:** Thursday, August 11, 2011 4:53 PM  
**To:** Glasier, Linda (ECY)  
**Subject:** Potential Stakeholders

Greetings.

You have been suggested as a potential stakeholder in the upcoming creation of a Guidance Document for conducting Alternative Assessments by the Washington State Department of Ecology.

In the attached documents you will find more information regarding this topic as well as anticipated timelines.

To sign up for our email list go to <http://listserv.wa.gov/cgi-bin/wa?A0=ECOLOGY-CHEM-HAZ-ALT-STAKEHOLDER> and click on the "join" link.

If you would like your name taken off this list, please reply to this email with your request.

Sincerely,

*Linda Glasier*

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