

Alternatives Assessment 101

Webinar

October 23, 2018

Context for Today's Webinar

- Compared to just a decade ago, scientific, policy and market/consumer drivers are increasing demands to better identify and adopt alternatives to toxic chemicals of concern
- **Alternatives assessment** has emerged as an important science policy field to help guide product design and substitution decisions
- But what is alternatives assessment?

Questions to be Addressed

- Today's 75 minute webinar is designed to be an introduction to those that are new to the field
 - ☑ What is alternatives assessment?
 - ☑ Why use it?
 - ☑ What are its main components
 - ☑ How does it differ from other aligned fields such as risk assessment or life cycle impact
 - ☑ Lessons and insights from practitioners and researchers in the field

Webinar Logistics

- Due to the number of participants on the webinar, all lines are 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
- The webinar is being recorded – slides/recording to be posted on www.saferalternatives.org

Today's Speakers



Joel Tickner

Professor of Public Health,
University of Massachusetts
Lowell



Pam Eliason

Senior Associate Director,
MA Toxics Use Reduction
Institute



Pamela Spencer

Senior Director Regulatory and
Product Steward Ship, Angus Chemical



Timothy Malloy

Professor of Law, UCLA



Cathy Rudisill

Chemistry Manager, SRC



Meredith Williams

Deputy Director, CA
Department of Toxic
Substances and Control

Alternatives Assessment 101

Joel Tickner – Lowell Center for Sustainable Production

Pam Eliason – MA Toxics Use Reduction Institute

October 23, 2018

What we'll cover

- ▶ What is alternatives assessment
 - Definitions and frameworks
 - Goals and considerations
- ▶ Principles and main elements of alternatives assessment
- ▶ Evolution of the scientific literature on alternatives assessment
- ▶ Policies and applications of alternative assessments
- ▶ Massachusetts Toxics Use Reduction Institute's approach
 - Tools
 - Examples/case studies
 - Promoting adoption
- ▶ Lessons learned and additional resources

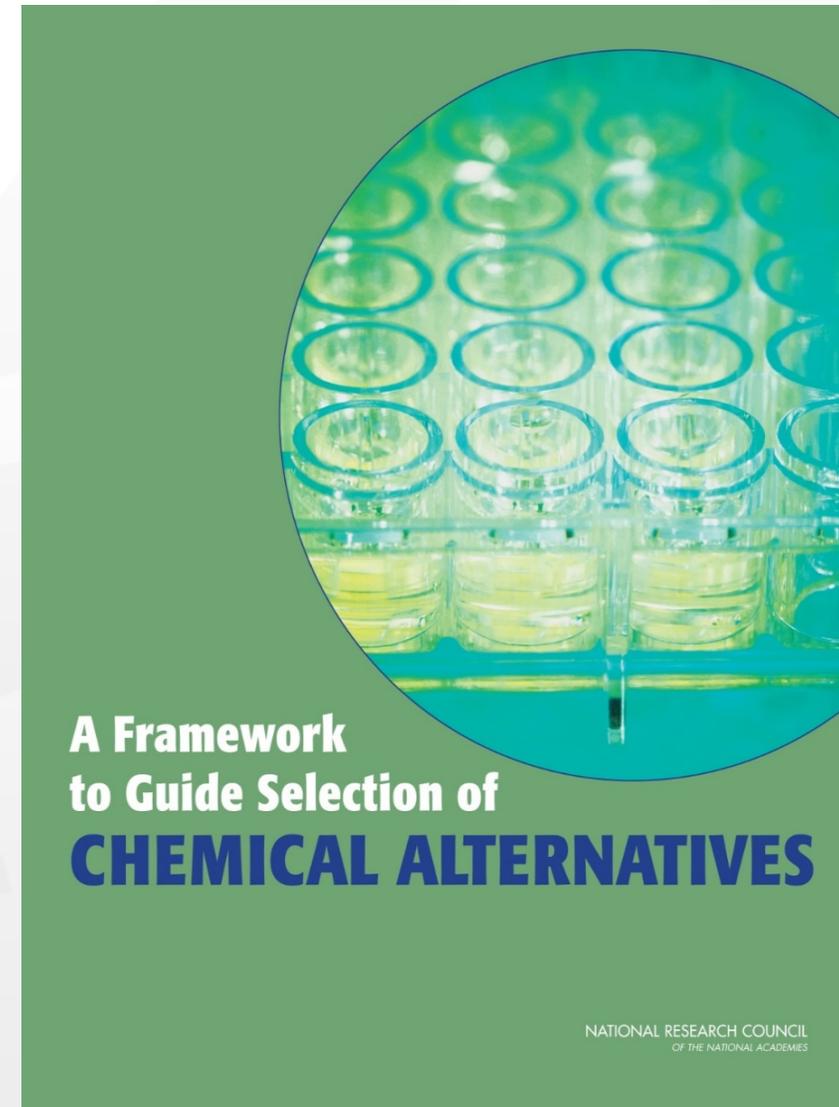
Overview

- ▶ Alternatives Assessment is a science-policy method focused on informing the selection of chemical alternatives, supporting the transition to safer chemicals, materials and products.
- ▶ There are a number of core components of alternatives assessment and some gaps in those components
- ▶ Alternatives assessment supports informed substitution which includes both assessment and adoption phases
- ▶ It is essential to remember context and goals of alternatives assessment so that “perfect isn’t the enemy of the good”

What is alternatives assessment?

“A process for identifying, comparing, and selecting safer alternatives to chemicals of concern on the basis of their hazards, comparative exposure, performance, and economic viability”

- NAS 2014



NAS 2014: Alternatives Assessment

is

- is a process for identifying, comparing and selecting safer alternatives to chemicals of concern.
- has a goal of facilitating an informed consideration of the advantages and disadvantages of alternatives to a chemical of concern.

is not

- a *safety assessment*, where the primary goal is to ensure that exposure is below a prescribed standard,
- a *risk assessment* where risk associated with a given level of exposure is calculated
- a *sustainability assessment* that considers all aspects of a chemicals' life cycle, including energy and material use.

Goal is Informed Substitution

EPA - 2010

A considered transition from a chemical of particular concern to safer chemicals or non-chemical alternatives.

The goals of informed substitution are to:

- Minimize the likelihood of unintended consequences, which can result from a precautionary switch away from a chemical of concern without fully understanding the profile of potential alternatives, and
- Enable a course of action based on the best information - on the environment and human health - that is available or can be estimated.

Regrettable Substitutions

A Few Examples

EDF Health

About this blog



Science, health, and business experts at Environmental Defense Fund comment on chemical and nanotechnology issues of the day.
Our work: [Chemicals](#)

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To search, type and hit enter

Search

Regrettable, if predictable: Bisphenol S mimics estrogen just like its better-studied cousin, bisphenol A

By RICHARD DENISON | BIO | Published: JANUARY 17, 2013

Richard Denison, Ph.D., is a Senior Scientist.

A rule of thumb in chemistry is that chemicals that look alike will more often than not act alike. (If it looks like a duck ...) Indeed, when chemical companies are faced with testing requirements for one of their chemicals, they routinely argue that they should be allowed to submit test data on a structurally related chemical instead.

So when it was revealed that companies making products (such as thermal receipt paper) that contain the estrogen-mimicking compound bisphenol A (BPA) were switching to another chemical called bisphenol S (BPS), many scientists' eyebrows quickly arched.

Take a look at these two chemical structures:



Methylene chloride & 1-Bromopropane (NPB)

BPA & BPS



Lynne Peeples [♥](#) [Become a fan](#) [✉](#) [🐦](#) [👍](#)

lynne.peeples@huffingtonpost.com

New Flame Retardants, Other Replacement Chemicals, Pose Same Problems As Predecessors

Posted: 11/28/2012 12:04 pm EST | Updated: 11/28/2012 10:06 pm EST

Focus of Alternatives Assessment

Alternatives assessment is a step-defined, action-oriented process

- ▶ Focus on function not the particular chemical
 - Focus on “intrinsic impact reduction”
 - Considers the “necessariness” of a chemical
- ▶ Finding a safer alternative and getting industry to adopt the use of it are not the same thing.
 - Must also be affordable and effective
- ▶ In some cases, safer, feasible alternatives may not exist and need to be developed

Function

The starting point of Alternatives Assessment

Table 1. Functional Substitution for Chemicals in Products, Chemicals in Processes

Functional Substitution Level	Chemical in Product Bisphenol-a in Thermal Paper	Chemical in Process Methylene Chloride in Degreasing Metal Parts
Chemical Function (Chemical Change)	Is there a functionally equivalent chemical substitute (i.e., chemical developer)? Result: Drop-in chemical replacement	Is there a functionally equivalent chemical substitute (i.e., chlorinated solvent degreaser)? Result: Drop-in chemical replacement
End Use Function (Material, Product, Process Change)	Is there another means to achieve the function of the chemical in the product (i.e., creation of printed image)? Result: Redesign of thermal paper, material changes	Is there another means to achieve the function of the process (i.e., degreasing)? Result: Redesign of the process (e.g., ultrasonic, aqueous)
Function As Service (System Change)	Are cash register receipts necessary? Are there alternatives that could achieve the same purpose (i.e. providing a record of sale to a consumer)? Result: Alternative printing systems (e.g., electronic receipts)	Is degreasing metal parts necessary? Are there other alternatives that could achieve the same purpose (i.e., providing metal parts free of contaminants for other end uses)? Result: Alternative metal cutting methods

Tickner, et al,
Environmental Science and
Technology, 2014

Three essential steps of alternatives assessments (O'Brien 2000)

"One of the most essential, and powerful steps to change is understanding that there are alternatives"

- ▶ Presentation of a full range of alternatives
- ▶ Presentation of the potential adverse effects of each option
- ▶ Presentation of potential benefits of each option

Commons Principles for Alternatives Assessment

www.bizngo.org/alternatives-assessment/commons-principles-alt-assessment

- ▶ Reduce Hazard
- ▶ Minimize Exposure
- ▶ Use Best Available Information
- ▶ Require Disclosure and Transparency
- ▶ Resolve Trade-Offs
- ▶ Take Action

THE COMMONS PRINCIPLES FOR ALTERNATIVES ASSESSMENT

Addressing Chemicals of Concern to Human Health or the Environment

In October 2012, a group of 26 environmental health scientists, advocates, funders and policy makers met in Boston, Massachusetts for two days of meetings entitled **Building a Chemical Commons: Data Sharing, Alternatives Assessment and Communities of Practice**. One of the key outcomes of this meeting was an agreement regarding the need for a common definition and set of principles for chemicals alternatives assessment. Following this meeting, a subcommittee met over four months in 2013 to refine a consensus set of principles. These principles were based on earlier foundational work by the Lowell Center for Sustainable Production, the Massachusetts Toxics Use Reduction Institute, the Environmental Defense Fund, and the BizNGO Working Group. These principles are now available to be shared and used in framing discussions about alternatives assessment and to guide decision making about safer chemical use.

Alternatives Assessment is a process for identifying, comparing and selecting safer alternatives* to chemicals of concern (including those in materials, processes or technologies) on the basis of their hazards, performance, and economic viability. A primary goal of Alternatives Assessment is to reduce risk to humans and the environment by identifying safer choices.

These Principles for Alternatives Assessment are designed to guide a process for well informed decision making that supports successful phase out of hazardous products, phase in of safer substitutes and elimination of hazardous chemicals where possible.

REDUCE HAZARD Reduce hazard by replacing a chemical of concern with a less hazardous alternative. This approach provides an effective means to reduce risk associated with a product or process if the potential for exposure remains the same or lower. Consider reformulation to avoid use of the chemical of concern altogether.

MINIMIZE EXPOSURE Assess use patterns and exposure pathways to limit exposure to alternatives that may also present risks.

USE BEST AVAILABLE INFORMATION Obtain access to and use information that assists in distinguishing between possible choices. Before selecting preferred options, characterize the product and process sufficiently to avoid choosing alternatives that may result in unintended adverse consequences.

REQUIRE DISCLOSURE AND TRANSPARENCY Require disclosure across the supply chain regarding key chemical and technical information. Engage stakeholders throughout the assessment process to promote transparency in regard to alternatives assessment methodologies employed, data used to characterize alternatives, assumptions made and decision making rules applied.

RESOLVE TRADE-OFFS Use information about the product's life cycle to better understand potential benefits, impacts, and mitigation options associated with different alternatives. When substitution options do not provide a clearly preferable solution, consider organizational goals and values to determine appropriate weighting of decision criteria and identify acceptable trade-offs.

TAKE ACTION Take action to eliminate or substitute potentially hazardous chemicals. Choose safer alternatives that are commercially available, technically and economically feasible, and satisfy the performance requirements of the process/product. Collaborate with supply chain partners to drive innovation in the development and adoption of safer substitutes. Review new information to ensure that the option selected remains a safer choice.

* Safer Alternative: An option, including the option of not continuing an activity, that is healthier for humans and the environment than the existing means of meeting that need. For example, safer alternatives to a particular chemical may include a chemical substitute or a re-design that eliminates the need for any chemical addition." From Tickner, J. and Eliason, P. *Alternatives Assessment for Chemicals: From Problem-Evaluation to Solutions-Assessment and Implementation: A background paper created expressly for use in the March 31-April 1, 2011 Interagency Discussion on Alternatives Assessment, EPA Potomac Yards Conference Facility, Crystal City, VA, March 24, 2011*

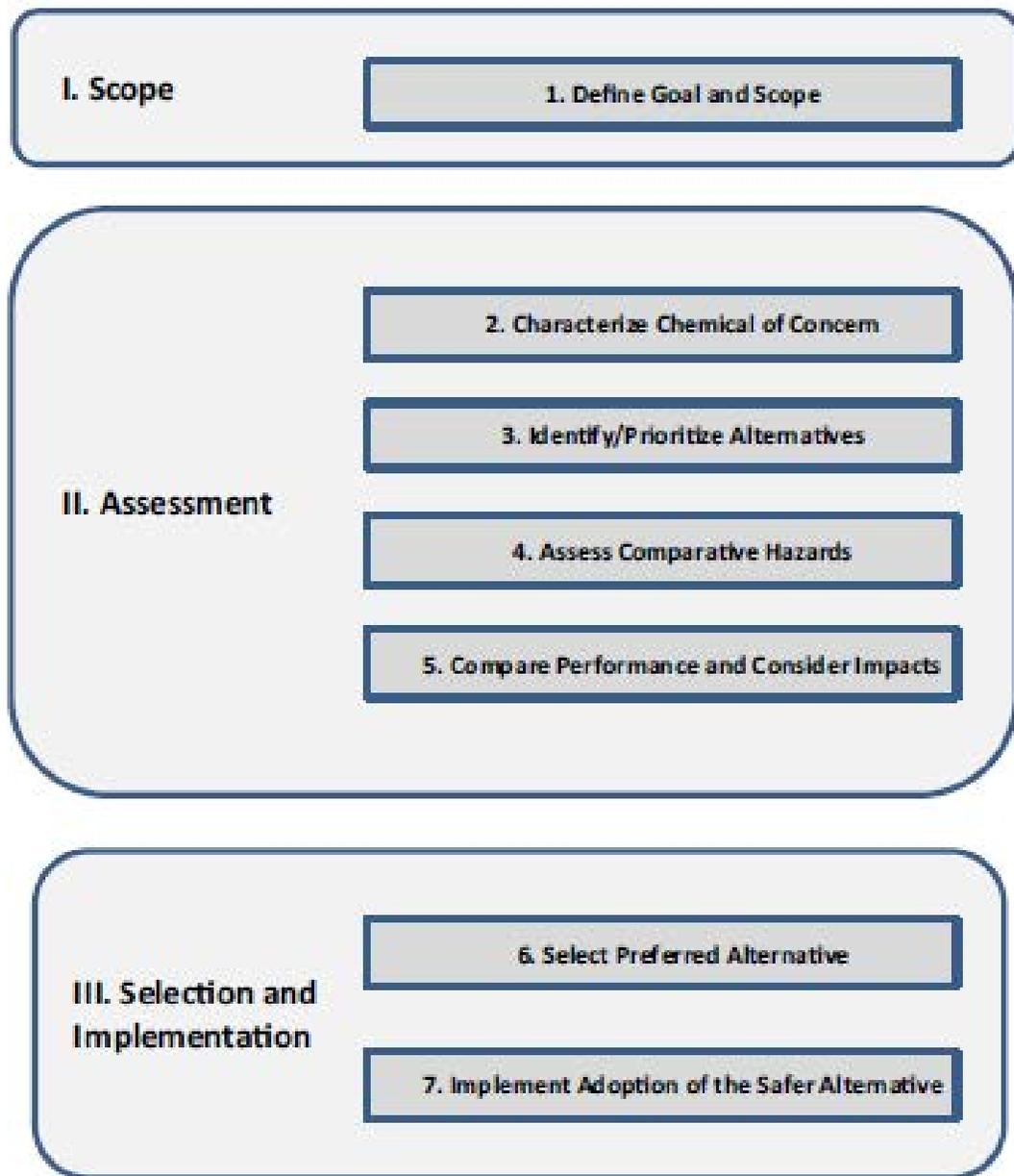


Fig. 1. The scaffolding of a chemicals alternatives assessment.

Geiser, et al, 2015

Table 1. Elements of AA—A snapshot

Component		What it involves
Assessment	Scoping, problem formulation	<ul style="list-style-type: none"> – Establishes the scope and plan for the assessment – Identifies stakeholders to engage and the decision rules that will guide the assessment – Gathers data on the chemical of concern, its function and application
	Identify alternatives	– Identifies alternatives to be considered based on the functional needs in the application currently being performed by the chemical of concern
	Hazard assessment	– Evaluates the human health and ecological hazards for each alternative compared to the chemical of concern
	Exposure characterization	– Evaluates the intrinsic exposure potential for each alternative on the basis of boundaries established in the problem formulation step
	Technical feasibility assessment	– Assesses the performance of alternatives against the requirements established during the problem formulation step
	Comparative economic feasibility assessment	– Assesses the economic feasibility of alternatives against the requirements established during the problem formulation step
	Other life cycle considerations	– Addresses additional factors critical for characterizing effects to human health and the environment beyond those included in the hazard and exposure assessment component to avoid risk trade-offs (e.g., energy, climate change effects, etc.)
	Decision making	<ul style="list-style-type: none"> – Identifies acceptable alternatives on the basis of information compiled in previous steps – Addresses situations in which no alternatives are currently viable by initiating research and development to generate new alternatives or improve existing options – Establishes an implementation plan
Action	<i>Adoption</i>	– Implementation of the safer, feasible alternative and identification of any potential trade-offs and continuous improvement opportunities
	<i>Link to safer chemistry and/or technology research and development</i>	– When no safer, feasible alternative is identified, research and development should be initiated

Source:
Tickner et al. IEAM 2018

Source: Expands on the NRC (2014) framework by including additional details on technical, economic assessment and decision making that is inclusive of other AA frameworks, such as the Interstate Chemicals Clearinghouse Alternatives Assessment Guidance, V. 1.1 (IC2 2017).

Alternatives Assessment Frameworks



Over 20
alternatives
assessment
frameworks

- These are guides, not prescriptive protocols
- Some more resource intensive than others
- Many elements in common
- There is a need for consistent, yet flexible alternatives assessment methods and guidance
 - greater alignment among frameworks and elements important for greater applicability/ transferability of AAs conducted

AA Methods and Tools

Comparative Hazard Assessment

- Most developed
- Data gaps remain a challenge

Economic Assessment

- More “academic” socio-economic analysis methods available, but difficult for SMEs to use
- Limited tools

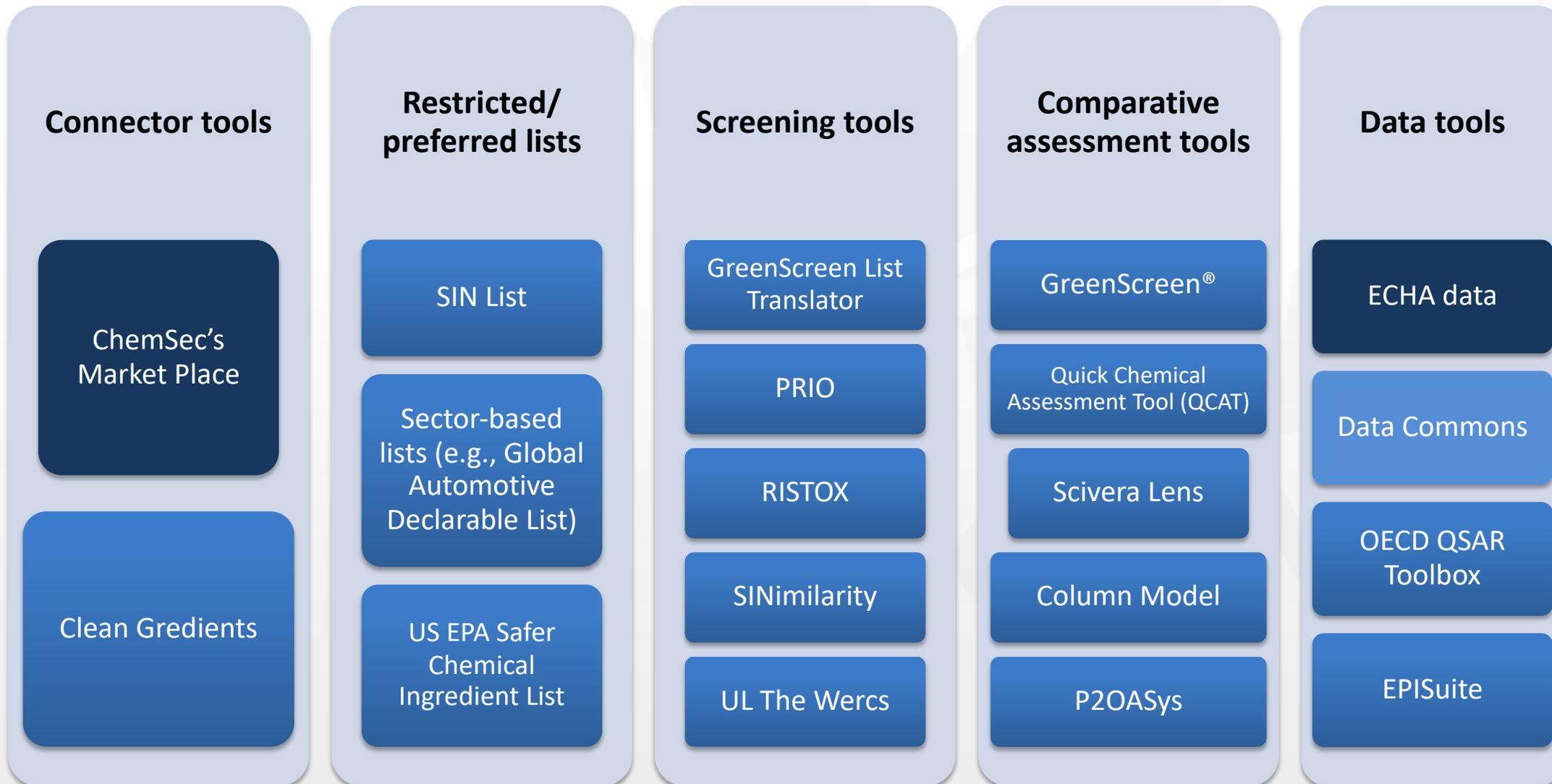
Technical/ Performance Assessment

- Very limited
- Case/application-specific

Lifecycle considerations, comparative exposure characterization and decision analysis, but tools specific for AA limited

Landscape of Hazard Assessment Tools

(Not comprehensive, or mutually exclusive)



OECD Toolkit

OECD Substitution and Alternatives Assessment Tool Selector

The Tool Selector is designed to provide information on tools that can be used in conducting chemical substitutions or alternatives assessments. The filters below may be used to identify tools of greatest relevance to your substitution or alternatives assessment goals. You may also view more in-depth information on each tool, or a side-by-side comparison of a set of tools, by selecting two or more tools from the list below.

All tools included in the Tool Selector address **chemical hazard assessment**, and may address other comparative attributes.

Tools that contain a repository of organized information but do not have a mechanism for data manipulation for outside users are flagged below as data sources using the following symbol: 

For information on tools with a primary focus on non-hazard comparative attributes such as cost/benefits and availability, life-cycle impacts, and materials management, please visit the [Inventory of Non-Hazard Assessment Tools](#).

Each tool has its benefits and limitations. The user of this toolbox needs to understand the capabilities of the tools to make the most informed decisions about conducting alternatives assessments.

What's an Alternatives Assessment Tool?

A tool is an approach for evaluating a chemical, material, process, product, and/or technology for attribute analysis within a chemical substitution/alternatives assessment.



Decision Analysis

Advancing Alternatives Assessment for Safer Chemical Substitution: A Research and Practice Agenda

Joel Tickner,* †‡ Molly Jacobs, †‡ Tim Malloy, § Topher Buck, || Alex Stone, # Ann Blake, †† and Sally Edwards ‡

†University of Massachusetts Lowell, Department of Public Health, Lowell, Massachusetts, USA

‡Lowell Center for Sustainable Production, University of Massachusetts Lowell, Lowell, Massachusetts, USA

§University of California, Los Angeles, School of Law, Los Angeles, California, USA

||Northeast Waste Management Officials' Association, Interstate Chemicals Clearinghouse, Boston, Massachusetts, USA

#Washington Department of Ecology, Lacey, Washington, USA

††Environmental and Public Health Consulting, Alameda, California, USA

ABSTRACT

Alternatives assessment has emerged as a science policy field that supports the evaluation and adoption of safer chemistries in manufacturing processes and consumer products. The recent surge in the development and practice of alternatives assessment has revealed notable methodological challenges. Spurred by this need, we convened an informal community of practice comprising industry experts, academics, and scientists within government and nongovernmental organizations to prioritize a research and practice agenda for the next 5 years that, if implemented, would significantly advance the field of alternatives assessment. With input from over 40 experts, the agenda outlines specific needs to advance methods, tools, and guidance in 5 critical areas: hazard assessment, comparative exposure characterization, life cycle considerations, decision making, and professional practice. Fifteen research and practice needs were identified, ranging from relatively simple efforts to define a minimum hazard data set to the development of more complex performance and decision-analytic methods and data

Research Needs Moving Forward

- ▶ Hazard Assessment
 - Improve approaches for ecotox, integrating multiple data types, and addressing uncertainty
 - Establish approaches for mixtures and chemical to material comparisons
- ▶ Comparative exposure assessment
 - Identify how results from a comparative exposure assessment should be integrated with hazard assessment results to identify trade-offs in the AA process
- ▶ Life cycle assessment
 - Streamline life cycle assessment needs during the initial scoping and problem formulation stage of an AA by targeting life cycle stages and impact categories that are most significant

Research Needs Moving Forward

- ▶ Decision-Analysis
 - Engage in method and tool development for different aspects of decision making (analysis and deliberation) for private and regulatory contexts
- ▶ Professional Practice
 - Develop best-practice guidance for components of AA
 - Enhance AA professional capacity through training and education

Alternatives Assessment in Policy

Regulatory policies

- Require alternatives assessment to demonstrate availability or lack of safer feasible alternatives to a chemical of concern (REACH, CA SCP)
- Require alternatives assessment to support regulatory actions (WA, ME)
- Integrate safer alternatives considerations in procurement (SF)
- Require facility planning that examines alternatives (MA TURA)
- Classification-based substitution requirements (EU occupational)

Non-regulatory programmatic support policies

- Conduct assessments for priority chemicals (WA, EPA DfE, TURI)
- Provide technical support, demonstration, networking, training (TURI)
- Provide data, positive listing, labeling (EPA Safer Choice)

Promoting Safer Alternatives

Massachusetts Toxics Use Reduction Institute

Identify and prioritize higher hazard substances

Train professionals on chemical hazard, performance and cost assessment

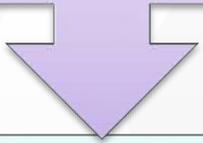
- Provide tools to identify, understand and compare alternatives

Conduct assessments of alternatives to common uses of toxic chemicals

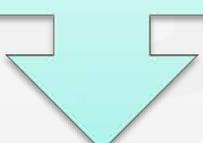
Fund research to develop safer, effective and affordable alternatives to toxics

Tools for Finding and Assessing Safer Alternatives

Identifying safer parts cleaning solutions: www.cleansolutions.org



Gathering data to support evaluation process:
<http://guides.turi.org/beyondmsds>



Comparing chemical, product and process alternatives: <https://p2oasys.turi.org/>

CleanerSolutions.org

You can find a wealth of

CleanerSolutions Database

Simple Solutions for Surface Cleaning

[More about CleanerSolutions](#)

[Ask your cleaning questions today!](#)

TURI Labo Find a Cleaner

Results are linked to your contaminant. Search for a cleaner that has successfully removed a contaminant similar to your own. Chances are that the alternative will also work for you. Optionally, you can add substrate and equipment criteria to help narrow your search.

[Find your contaminant](#)

[Replace cleaner.](#)

[Safety Solutions environmental](#)

[Browse by industry.](#)

[Part Design part shape, size](#)

Required Field
You must select one or more contaminants.

Optional Fields
Filter your search by substrate or equipment type, or leave these fields set to *Any* to include all results for a given contaminant.

- Contaminant
- Abrasive
 - Abrasives
 - Adhesive
 - Alcohol
 - Buffing/Polishing Comp
 - Calcium/lime
 - Carbon Deposits
 - Clay
 - Coatings
 - Cutting/Tapping Fluids
 - Dirt
 - Films

- Substrate
- Any
 - Alloys
 - Alumina
 - Aluminum
 - Brass
 - Carbon Fiber
 - Carbon Steel
 - Ceramics
 - Chrome
 - Cold Rolled Steel
 - Copper
 - Electronics

- Equipment
- Any
 - High Pressure Spray
 - Immersion/Soak
 - Low Pressure Spray
 - Manual Wipe
 - Mechanical Agitation
 - Media Blasting
 - Plasma
 - Steam
 - Supercritical Extraction
 - Ultrasonics
 - Vapor Degreasing

All Fields Hold down the *shift* or *ctrl* keys to select multiple values.

Optional Search Filters



Welcome to P2OASys

Get Started

What is P2OASys?

P2OASys allows companies to assess the potential environmental, worker, and public health impacts of alternative technologies aimed at systematic thinking about the potential hazards posed by current and alternative processes identified during the TUR planning process.

Systematically examine the potential environmental and worker impacts of options, examining the total impacts of process change.

Compare options with current processes based on quantitative and qualitative factors.

Embedded formulae in P2OASys provide a numerical hazard score for the company's current process and identified options, which can be used by experts to make decisions on adoption of alternatives. Companies input both quantitative and qualitative data on the chemical toxicity of the organization likely as a result of the proposed option.

Any question or comments can be directed at Jason Marshall:

Jason Marshall:
Tel: (978) 934-3133
Email: Jason@turi.org

This web site is maintained by the [Toxics Use Reduction Institute](#) at:
The Massachusetts Toxics Use Reduction Institute
University of Massachusetts Lowell
600 Suffolk Street
Lowell, Massachusetts 01854-28
Tel: 978-934-3275 Fax: 978-934-3050



Welcome to the P2OASys Tool!

Information about P2OASys can be found on the TURI webpage [here](#).

Create New Assessment

Load From P2OASys Database

Name	P2OASys Format	SDS Format	Remove
Sample Chemical	Enter Data	Enter Data	Remove

Assessment Score Summary

Compare Entered Data

Upload A Chemical/Product to the P2OASys Database

Upload A Mixture to the P2OASys Database

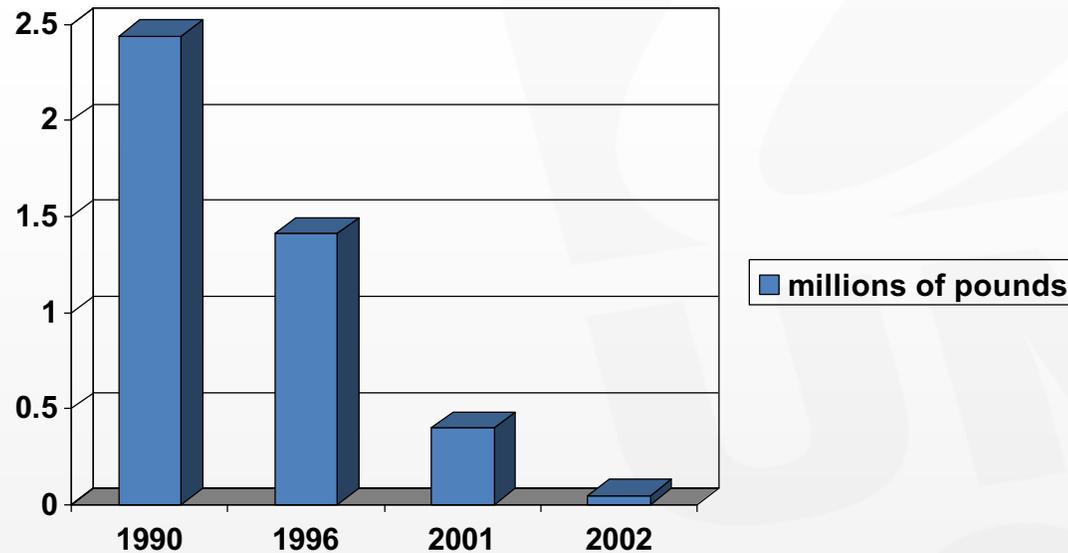
Export Data to CSV

Import Data from CSV

Hazard Score Matrix

Case Study: Trichloroethylene

The Result of the Massachusetts Toxics Use Reduction Planning and Technical Support Process



Trichloroethylene Cleaning Use Data

Case Study: Perchloroethylene

Uses in Massachusetts

- **Garment cleaning (professional dry cleaning)**
- Industrial vapor degreasing
- Automotive aerosols

Why Higher Hazard Substance

- Neurotoxin
- Skin and eye irritant; Causes defatting of skin
- Liver, Kidney and CNS damage
- Carcinogen (NTP: Reasonably anticipated to be a human carcinogen; IARC Group 2A Probably carcinogenic to humans)
- Toxic to aquatic organisms

Alternatives Evaluated

- n Propyl bromide
- Siloxane (D5)
- Propylene glycol ethers
- Acetal (Solvon K4)
- High flashpoint hydrocarbons
- Liquid CO₂
- Wet Cleaning

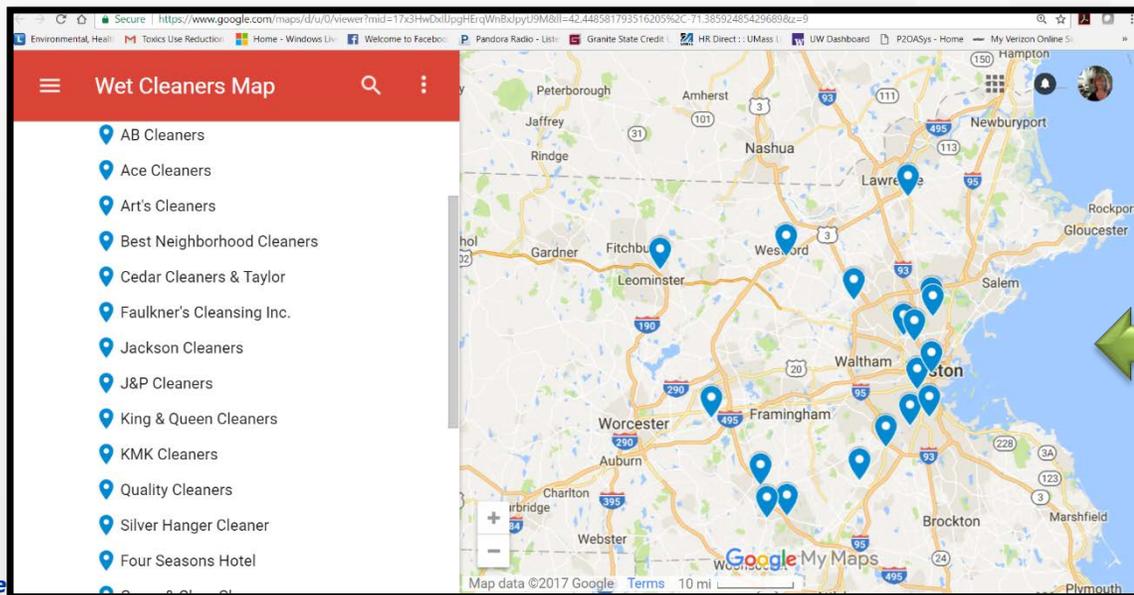
Key Assessment Criteria		Perc (reference)	Wet Cleaning ¹	Carbon Dioxide	High Flashpoint Hydrocarbons	Acetal	Propylene Glycol Ethers	Siloxane	n Propyl Bromide
Common Trade Names / Manufacturers of Equipment or Solvents			Wascomat, Miele, Continental, HwaSung, AquaSolo	Cool Clean Technologies, Solvair*	DF2000™ Fluid, EcoSolv*, ShellSol D60, Caled Hydroclene	Solvon K4	Solvair*, Rynex 3*, Impress*, Gen-X*	Green Earth* D5 solvent	Drysolv*, Fabrisolv™ XL
Solvent Chemical Identification [CAS#]		Perchloroethylene [127-18-4]	Solvent: Water Detergents: See full report†	Carbon Dioxide [124-38-9]	Naphtha (petroleum) hydrotreated heavy [64742-48-9]; C10-C13 isooalkanes [68511-17-7]	1-(butoxy methoxy) butane (butyle) [2968-90-3]	dipropylene glycol tert-butyl ether, [532739-11-2]; di-propylene glycol n-butyl ether, [29911-28-2]	Decamethylcyclodextran to siloxane (D5) [541-02-6]	N Propyl Bromide (nPB) [106-94-5]
Technical / Performance ²	Cycle time (min)	45	20-40	35-45	60-75	60-65	>45	53-58	45
	Load capacity (lb)	50	20-75	60	35-90	40-90	43	55	50
	Materials system may have difficulty with	Leather, suedes, beads, delicates	Leather, suede and fur	Triacetates, specially dyed acetates	Vinyl appliques	Appliques or decorations glued to fabric	None identified	None identified	Leather, suedes, beads, delicates
	Spotting requirements	Moderate	Low	High	Moderate	Low	Low	High	Low
Financial	Equipment	\$40,000 - \$65,000	\$36,000 - \$61,000	>\$100,000 - >\$150,000	\$38,000 - \$75,000	\$50,000 - \$100,000	\$56,000	\$30,500 - \$55,000	\$40,000 - \$60,000 or retrofit costs
	Chemical cost per gallon	\$17	\$0.007/gal (water); \$25-\$31/gal (detergent)	\$0.18/lb (CO ₂); \$40/gal (detergent)	\$14-\$17	\$28-\$34	\$25-\$30	\$22-\$28	\$40-\$64
	Electricity usage ³ (kWh/100 lb)	26.6	9.3	30.9	35.5	Similar to hydrocarbon	Unavailable	54.2	Unavailable
	Typical cost per pound cleaned ⁴	\$0.63-\$1.94 avg. \$1.02	\$0.57-\$1.32 avg. \$1.10	\$1.40	\$0.73-\$1.02 avg. \$0.88	Unavailable	\$1.14	\$1.08-\$2.33 avg. \$1.71	Unavailable
Environmental	Persistence ⁵ (water, soil, sediment, air)	M (water), H (soil, sed, air)	L (water, soil, air), M (sed)	NA	L (water, soil, air), M (sed)	L (water, soil, air), M (sed)	L (water, soil, air), M (sed)	L (water, soil), H (sed, air)	L (water, soil), M (sed), H (air)
	Bioaccumulation ⁶	Low	Low	NA	Moderate	Low	Low	Moderate	Low
	Aquatic Toxicity ⁷	Moderate	Low to Moderate ⁸	Low	High	Moderate ⁹	Low	High	High
Human Health	Recommended Exposure limits ¹⁰	25 ppm	NE	5000 ppm	100 ppm ¹¹	NE	NE	10 ppm ¹²	10 ppm
	Central Nervous System Effects	Yes	No ¹³	No ¹⁴	Yes	No data available	Yes	Some evidence	Yes
	Carcinogenicity	IARC Probable human carcinogen	Not classified by IARC	Not classified by IARC	Not classified by IARC	Not classified by IARC	Not classified by IARC	Some evidence	Clear evidence in animal studies by NTP
	Reproductive / Developmental Toxicity	Yes	Negligible ¹⁵	No data available	No data available	No data available	No ¹⁶	Studies indicate concern	Yes

Summary Table: Comparison of Perc and Seven Garment Cleaning Alternatives



Professional Wet Cleaning

- ▶ Identified clear preference given comparisons of hazard, cost and performance
- ▶ Follow up with case studies and demonstrations
- ▶ Support peer training to assure success



http://www.turi.org/Our_Work/Business/Small_Businesses/Dry_Cleaning

MA currently has 17 professional dedicated wet cleaners

Case Study: Hexavalent Chromium

Uses in Massachusetts

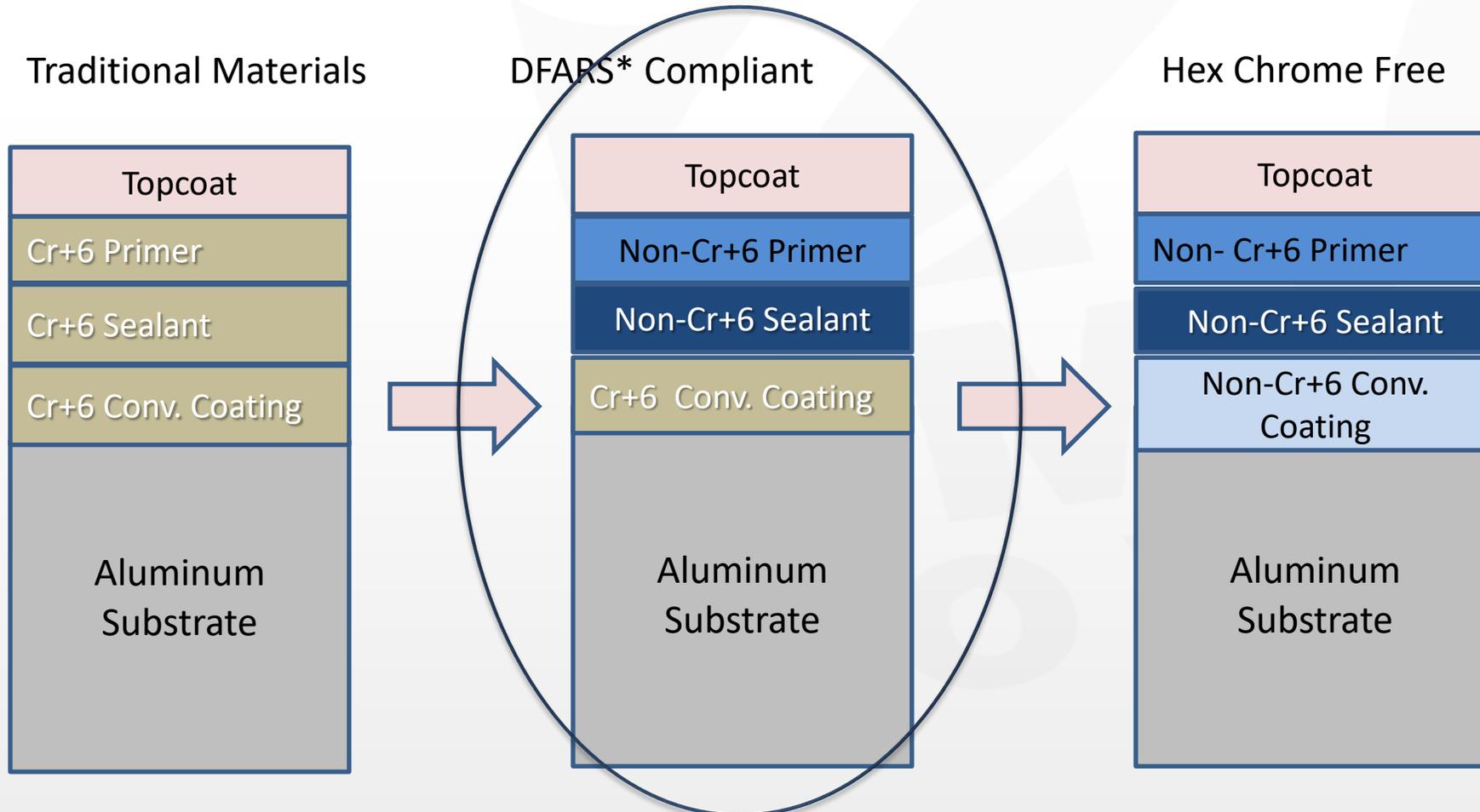
- **Metals processing and plating (corrosion resistance)**
- Paints, pigments and dyes

Why Higher Hazard Substance

- Carcinogenic (lung)
- Mutagenic
- Developmental toxicity
- Acute toxicity – respiratory tract and skin sensitizer

Reducing Use of Hexavalent Chromium

Aerospace/Defense Applications

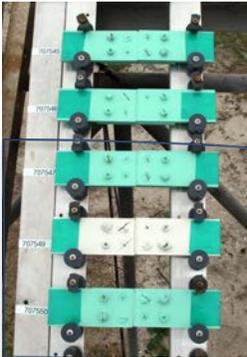


* Defense Federal Acquisition Regulation Supplement (May 2011)

Industry Collaborative Performance Testing Approach



Accelerated Corrosion Test, Inspection & Analysis



Long-term Corrosion Test



Statistical Analysis & Documentation



Test Vehicle Assembly*



Test Vehicle Preconditioning



Evaluating Relative Hazard of Alternatives



Conversion Coating



Developing Alternatives when None Commercially Available

Significant
use of
toxics

No safer
alternatives
available

Sector
capacity

Fill data
gaps

TURI's Academic Research Program

Historical Perspective

Since 1992

- Over \$1.76 M in funding
- 95 projects
- 120 students



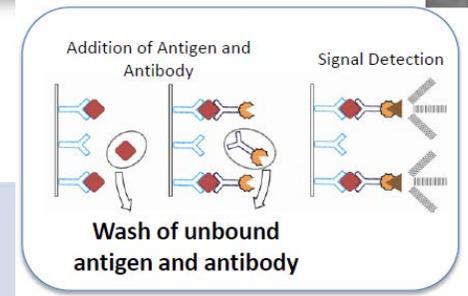
Starting in 2016

- Identify opportunities from TUR Plan Update summaries
- Reach out directly to companies
- Develop specific research proposals
- Invite faculty to respond

Safer Surfactants in Medical Devices

Octylphenol ethoxylates (OPEs)

- Common surfactant in immunoassay products
- Aquatic toxicity, potential endocrine disruption, breakdown to OP (higher toxicity, persistence)
- Listed as candidate SVHC



Research

- Performance criteria from industry partner
- Optimizing performance of viable polysaccharide-based alternative
- Assessing potential for negative environmental or human health impacts
 - Cytotoxicity screen
 - Biodegradation studies

TURI Prioritizes Value-Added Activities

Focus on

High hazard and/or volume of use chemicals

Similar processes/uses across sectors



Answer application relevant questions about alternatives

Performance

Hazards

Cost



Develop information appropriate for audience

Manufacturer

End User/Consumer

Lessons Learned

From the Toxics Use Reduction Institute Perspective

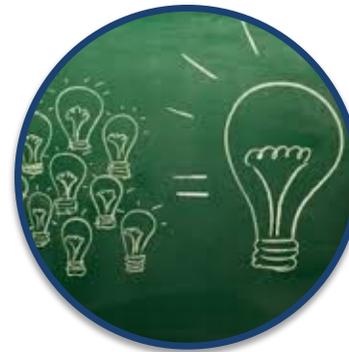


Actionable information CAN be developed quickly when key partners engaged



Identify priorities

- Evidence of EH&S hazards
- Customer restrictions
- Future regulation



Do your research

- Optimize performance
- Assess potential hazards
- Check assumptions



Disseminate information broadly



Lessons learned on alternatives assessment

- ▶ Alternatives assessment is a growing field of science and practice which has a number of methodological and data gaps.
- ▶ A mix of regulatory and non-regulatory policy tools is needed to support the transition to safer chemicals including requirements to evaluate alternatives when restrictions are proposed.
- ▶ Remember alternative assessment's action orientation. Avoid paralysis by analysis – goal is “excellent action” not “excellent paper work”
- ▶ Keep it flexible and iterative and adaptable to decision-contexts and different users
- ▶ Focus on both assessment and adoption
- ▶ Need to build a more coherent, coordinated community of practice so as to ensure the science, methods and practice move in the needed direction

Alternatives Assessment Resources

- ▶ OECD Substitution and Alternatives Assessment Toolbox (Tools and model alternatives assessments) - <http://www.oecdsaatoolbox.org/>
- ▶ OSHA Transitioning to Safer Chemicals (Simple alternatives assessment process for small and medium sized companies with links to many tools)- https://www.osha.gov/dsg/safer_chemicals/
- ▶ Massachusetts Toxics Use Reduction Institute (TURI reports, tools, library, assessments) – www.turi.org
- ▶ Interstate Chemicals Clearinghouse (policy database, hazard assessment database) - <http://www.theic2.org/>
- ▶ Subsport (tools, assessments, frameworks and training materials) – www.subsport.eu
- ▶ Clean Production Action (Green Screen and alternatives assessment resources) – www.cleanproduction.org
- ▶ Chemical Commons (Searchable chemical hazard data) <https://commons.healthymaterials.net/>

International
Symposium on
Alternatives
Assessment

Building the Field

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY (CALEPA) | SACRAMENTO, CA | NOVEMBER 1-2, 2018

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California Environmental Protection Agency (CalEPA)

Sacramento, California | November 1-2, 2018

Register at www.saferalternatives.org



Contact information

- ▶ Pam Eliason – pam@turi.org
- ▶ Joel Tickner – joel_tickner@uml.edu

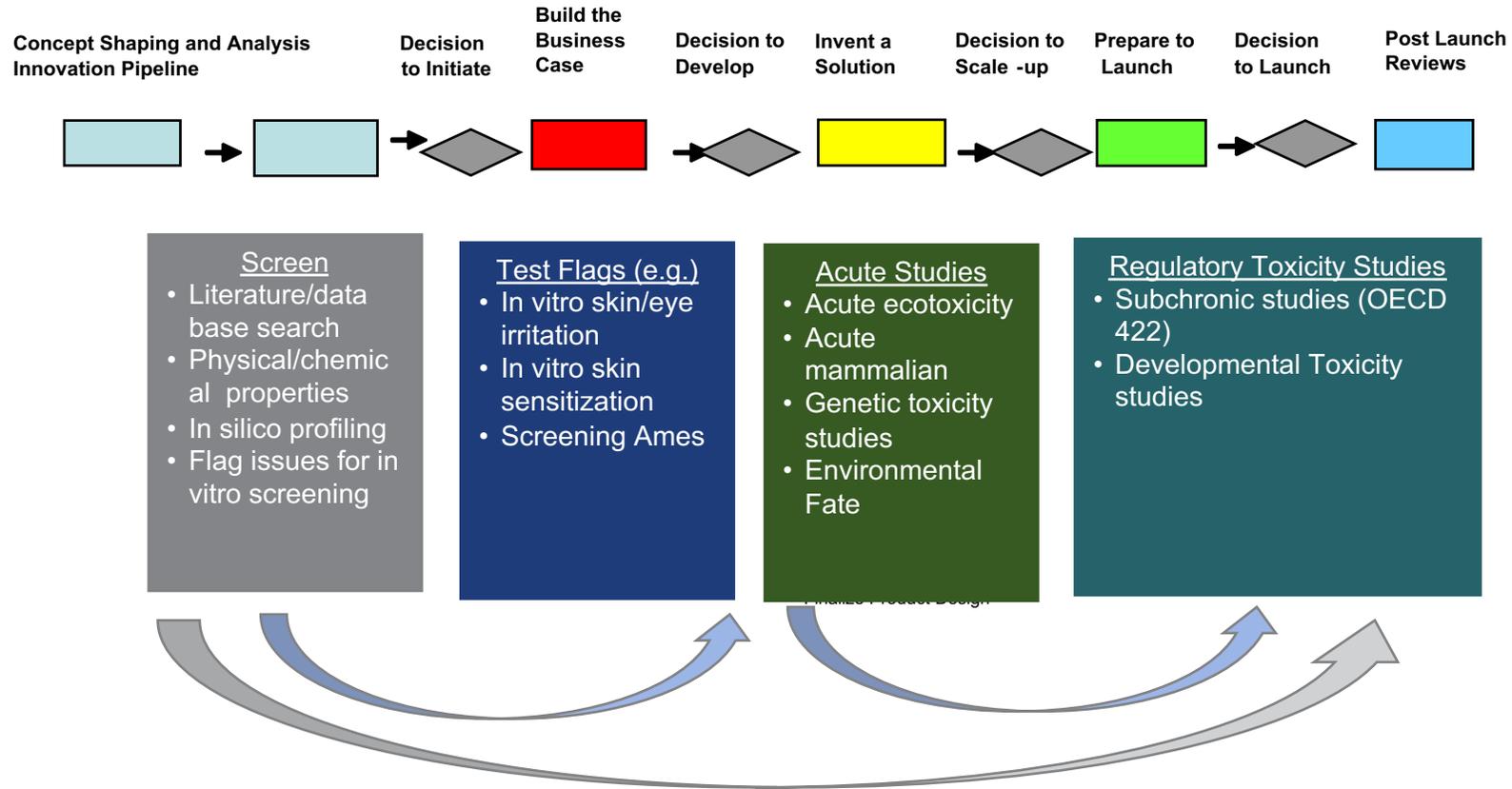
Speaking...



Pamela Spencer

Senior Director Regulatory and
Product Steward Ship, Angus Chemical

Example of Safety Screening in Product Introduction Stage Gate



Speaking...



Timothy Malloy
Professor of Law, UCLA

Speaking...



Cathy Rudisill
Chemistry Manager, SRC

Speaking...



Meredith Williams

Deputy Director, CA Department of
Toxic Substances and Control

Please post your questions



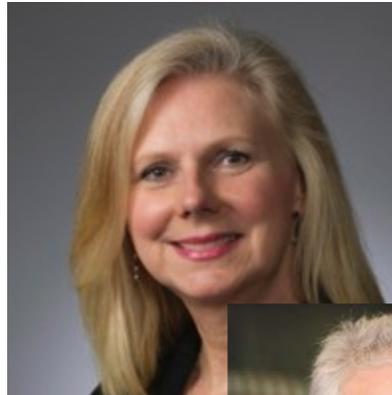
Joel Tickner

Professor Environmental Health, University of Massachusetts Lowell



Pam Eliason

Senior Associate Director, MA Toxics Use Reduction Institute



Pamela Spencer

Senior Director Regulatory and Product Steward Ship, Angus Chemical Co.



Timothy Malloy

Professor of Law, UCLA



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New professional association for alternatives assessment to be launched Nov 1

Only a few days left to register: www.saferalternatives.org



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