

In the Matter Of:
DTSC WORKSHOP

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June 04, 2014

Reported By: Stephanie Leslie CSR No. 7114

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DTSC WORKSHOP
REPORTER'S TRANSCRIPT OF PROCEEDINGS
Wednesday, June 4, 2014

25ed by: Stephanie Leslie, CSR No. 12893

1 Los Angeles, California Wednesday, June 4, 2014

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3 MR. SCHUMACHER: Good morning. Welcome,
4 everybody. I'm glad you could make it today. We're
5 starting on time, so people are still going to be
6 coming in, but that's fine.

7 Welcome to our third in a series of three
8 workshops on the proposed initial priority product list
9 from the State Department of Toxic Substances Control.
10 First of all, a very basic piece of information. The
11 drinking fountain and the men's and women's room are
12 out to the main lobby, go directly to the right, and
13 then take a left, and it's down the left-hand hall
14 there. All three are in the same area of that hallway;
15 okay?

16 Come in and take a seat. Welcome.

17 Today we'll follow the same agenda as the
18 first two workshops. We will have breakout sessions
19 like we did in Oakland and in Sacramento, so it will be
20 very familiar to those of you who have attended one or
21 more of our previous workshops.

22 We do appreciate you coming. We are doing
23 this to get input from all of you about these three
24 products. We do want to hear from you about what you
25 know, as we are not the be-all and end-all. We don'

1 know everything about these three priority products
2 that we're looking at, so we do appreciate whatever
3 you're willing to share with us today.

4 This session right now will be a general
5 session where Karl Palmer will give you an overview of
6 the entire process that we're undertaking here. So
7 after he speaks, we'll take general questions about the
8 process that we're undertaking, what we're doing, how
9 we're doing it, and some next steps after this last
10 workshop. After Karl's speech and after we deal with
11 general comments and questions, we will have a short
12 break, and then we'll start the three breakout sessions
13 in the three other rooms.

14 If you printed out the agenda beforehand,
15 unfortunately, because of the configuration of the
16 rooms, it's a little bit different, so the agenda that
17 you picked up at the front table is actually the one
18 you need to use. But we'll direct you to the right
19 room anyway. You shouldn't have any trouble finding
20 it.

21 Okay. Without any further ado, I'll turn it
22 over to Karl Palmer. He is the branch chief in charge
23 of this effort.

24 MR. PALMER: Thank you, Nathan.

25 So thanks, everyone, for being here. A cou

1 of things before we get started. I want to thank
2 Nathan and our public participation staff who are
3 helping us today and in our previous meetings to -- on
4 all the logistics, as well as facilitating these
5 meetings to make sure we do get good dialogue, which is
6 why we're here.

7 I also want to thank our court reporter,
8 Stephanie. And we are -- we do have court reporters in
9 the breakout sessions and here so we make sure to
10 capture all of your comments. So when you speak, if
11 you could, please state your name and where you're from
12 so that we can make sure to attribute comments to the
13 right people.

14 So I'm going to dive into a little
15 presentation here.

16 And it's also nice to see some familiar faces,
17 folks who have been here for our first two workshops,
18 some old faces of people we have worked with in the
19 past, and also some new faces.

20 So why are we here? I'm going to go through
21 this relatively quickly. I'm going to go over a little
22 overview of the process. I'm going to talk about the
23 regulations, because fundamentally the processes we are
24 going through are dictated by rule-making that we
25 adopted last year; and moving forward, we are going

1 talk about new rule-making. And we're going to talk
2 about time frames and what to expect.

3 But what's our goal at DTSC? First and
4 foremost, our goal today is to listen, to hear your
5 perspective, whatever it might be, about this process,
6 the priority products we're proposing to adopt. We
7 want to understand your perspective and get new input.
8 We also want people to share that with other folks
9 outside of us, and we want to be able to have an
10 opportunity to explain to you our thinking, our
11 process, our perspective, and then have a dialogue
12 about that. This is not -- we are not in a formal
13 hearing. We are not in a formal rule-making process.
14 This is all informal. It's about sharing information.

15 So basically the process is today, as in the
16 last few weeks -- we've been in these workshops. We're
17 having meetings with various stakeholders who have
18 interest in what we're doing. We're also collecting
19 comments. At the end of this presentation, there is an
20 e-mail address where you can send us formal comments
21 and data and information, and we'll evaluate all that.
22 Then we're going to go to the middle box here. We're
23 going to look at all this information we've been given,
24 and we're going to assess our proposed products, how
25 we've defined them, how we are going to roll this ou

1 ultimately in a new rule-making without our priority
2 products list. So we're going to refine those -- that
3 perspective before we go into formal rule-making.

4 And once we get into formal rule-making, there
5 will be another opportunity to provide input formally,
6 to give us comments, and we will respond formally to
7 each one of those comments. And I'll talk a little bit
8 about that process. So next steps. So in the early
9 part of March we announced what our draft priority
10 products list was. We're going to talk about that in
11 some detail and -- now that we've been in this series
12 of workshops where we're trying to get everyone to give
13 us their perspective. And our hope is that, once we're
14 done with these workshops and we've kind of relooked at
15 all the information and refined our perspective, then
16 we will go late this year into formal rule-making, in
17 which case there is a formal notice; there will be a
18 45-day comment period; we will respond to those
19 comments; and we'll also produce and go through the
20 process of all the other rule-making documents.

21 We'll go through the CEQA process; for those
22 of you not from California, the California
23 Environmental Quality Act. We'll be doing a fiscal and
24 economic analysis and putting together what we call our
25 initial statement of reasons which explains, and blo

1 by blow, in the regulation our thinking.

2 That process, once we enter it, is -- must be
3 completed within a year. And typically it takes about
4 a year to do a rule-making. So the time frame is
5 important because what, really, we're talking about,
6 from a regulatory standpoint, is that right now there's
7 no regulatory force. There's nothing new, other than
8 this discussion we're having today. Once we go to
9 rule-making for listing these priority products -- when
10 that is complete, which will be late in 2015, over a
11 year from now -- at that point is when the regulations
12 kick in. The people that manufacture these priority
13 products or the responsible entities, as defined by our
14 regulations, are then having to work with us to do the
15 alternatives analysis process. I'll talk to you a
16 little bit about that process.

17 So time frame -- it's not a fast process. So
18 if we back up a little and say, What is the department
19 doing with this program, well, the California
20 legislature in 2008 passed a bill that required the
21 department to adopt a new regulatory framework for
22 addressing hazardous chemicals in consumer production.
23 Part of the genesis and the driver for that is that the
24 California legislature was routinely addressing issues
25 in a one-by-one, blow-by-blow, chemical-by-chemical,

1 product-by-product process. We're going to ban BPA in
2 children's sippy cups. A couple of main challenges
3 with that is that, one, the legislature is not a
4 scientific body per se, and so they're subject to that
5 process, which is challenging for them. And it also
6 oftentimes led to what we call regrettable substitutes.
7 You might legitimately restrict or ban something or put
8 some restriction on something only to find that that
9 pushes people to use something else that might be as
10 bad or worse.

11 So that framework wasn't the best framework.
12 So they passed in 2008 a bill saying, DTSC, go adopt
13 some regulations that create a process for addressing
14 toxics in consumer products. And so the fundamental
15 purpose of that process that we adopted in regulation,
16 our Safer Consumer Products Regulation, really focuses
17 on this question: Is it necessary?

18 And that question is really geared to the
19 people that make these products, which says, Do you
20 need to use this chemical in your product? Is there a
21 different chemical that you can use that has inherently
22 safer hazard traits that could lower the risk? Do you
23 have to use a chemical at all? Are there other ways
24 that you can design that product?

25 So fundamentally, rather than DTSC, you know

1 saying -- or the California legislature saying, We
2 think you need to do it this way, and you need to
3 restrict it to this level, we're flipping that
4 responsibility around and saying, You tell us. How do
5 you think it might work to produce a product that still
6 works for the function that it was designed and yet
7 could be safer throughout its life cycle and use?

8 So I'm going to go over how our Safer Consumer
9 Products Regulations work in general. First, we were
10 tasked with identifying chemicals that we were
11 concerned about because they pose some kind of risk to
12 people or the environment. So what DTSC did was, last
13 October -- excuse me, September, end of September 2013,
14 we published our informative candidates chemicals list.
15 That list was adopted in regulation, and it brings in a
16 bunch of other lists. And I'm going to talk about that
17 in detail. So we established which chemicals we're
18 talking about. Then we had to identify products that
19 contain one or more of those chemicals. And that's the
20 process we're in right now. So again, last --
21 March 13th we announced which first three products we
22 were going to take a look at.

23 Now we're going to go through rule-making; and
24 once that rule-making's done to formally adopt those
25 products, then the alternative analysis process star

1 which is the process of looking at that product with
2 that chemical or other chemicals and saying, Is there a
3 different or safer way you can make them? And that's
4 the process of the people that make the product in
5 general.

6 Ultimately, once we go through that process
7 and DTSC gets the alternative analysis from the
8 manufacturer that says, We think this is the way we're
9 going to reformulate or rework this product, then we
10 have a responsibility to evaluate that analysis and
11 say, Does that work? Does it make sense, or do we
12 think that we need to impose some regulatory response
13 to modify that approach? And we'll talk about that.
14 So that's the basic four-part framework for our Safer
15 Consumer Products Regulation.

16 So the first part, candidate chemicals. What
17 we did in our regulations was adopt 23 different lists
18 from throughout the world that were adopted by various
19 authoritative bodies. So, for example, our sister
20 agency office, the Office of Environmental Health
21 Hazard Assessment, Prop 65 -- we pulled that in. We
22 went to the EU. We pulled in a couple lists from
23 there. We have other lists as well from Canada,
24 et cetera. These are, generally speaking, I think,
25 relatively strong lists that people understand in th

1 contexts. We've brought them into our framework, and
2 there's two types of lists. There's exposure-based
3 lists, which are things like our air toxics list, our
4 water quality lists, and our fire-monitoring lists.
5 These are represented by these larger grape-like
6 bubbles here, which are really what we call exposure
7 potential risks. They demonstrate that these
8 chemicals, in some way or shape or form, are getting to
9 the environment or getting into people.

10 The other lists -- and there's 15 of the other
11 ones -- are the hazard trait lists, which really focus
12 on the inherent properties of the chemical. Does it
13 cause cancer? Is it a mutagen? Is it an endocrine
14 disrupter, et cetera? And those comprise the lists
15 that we brought in.

16 And one thing I want to note: With the
17 exception of two of those lists, those lists are
18 dynamic. So we mentioned, when OEHHA changes the
19 Prop 65 list, by definition our list changes. So some
20 things will be added. Some things will drop off,
21 depending on the list and the time frame.

22 I also wanted to note there are considered
23 excluded. Our purview is very broad. Consumer
24 products is pretty much anything sold in California or
25 offered for sale, with some key exclusions, one bein

1 pesticides and another one being dangerous drugs or
2 prescription drugs.

3 And to back up a little, this list in total is
4 a little over 1100 chemicals, or chemicals and groups
5 of chemicals, and you can go to our Web page, and you
6 can go to chemical lists, and there's a searchable
7 database and you can see which chemicals are on that
8 list and search by a variety of methods.

9 So in the first round of party product
10 selection, we narrowed, by the way, the list of
11 chemicals you can choose from, because we said for this
12 first round, rather than pick any of those 1100
13 chemicals, we're only going to pick chemicals that are
14 both on one of the exposure lists and one of the hazard
15 trait lists. So that narrowed this 1100 down to about
16 150-plus chemicals and groups.

17 So identifying the priority products -- what
18 are the principles and the criteria that we use to pick
19 the priority products? There's two main broad
20 criteria. The first one is that there's potential
21 exposure to that chemical that's in the product, and
22 the second one is that exposure could potentially cause
23 significant or widespread adverse impact either to
24 people or the environment. That's an extremely broad
25 set of factors.

1 If we break those down somewhat -- and I've
2 highlighted some of these in our Safer Consumer
3 Products Regulations which focus on generally the
4 properties of the chemical, what are its hazardous
5 traits, what are its environmental and toxicological
6 end points. We do have some waiting factors, not many,
7 but one of them is to look at sensitive subpopulations.
8 So, for example, pregnant women, elderly, sensitive
9 environments, habitats, endangered species. Those
10 we're asked to look at and give them a little bit more
11 weight.

12 We're also looking at the widespread use of
13 the product, how much its potential exposure is there
14 in the household, in the workplace, in the environment,
15 throughout the product's life cycle. This is a
16 fundamental difference between us and most other
17 regulatory frameworks, because we're not just worried
18 about in the workplace; we're not just worried about in
19 the home or in the environment, but all of those things
20 from cradle to grave.

21 We're also interested in what happens to a
22 product at its end of life. For a durable good that
23 may have some hazard -- hazardous constituent in it --
24 maybe it's hazardous waste in California at its end of
25 life -- then we're asking people to look at that fac

1 and say, "Do we need to do something about that?"
2 Something that's typically an externalized cost or
3 factor out of those people manufacturing that good.

4 I highlighted in here the availability of
5 information. I did that because one of the reasons
6 we're having these workshops is because we have limited
7 bandwidth in terms of getting information that's
8 publicly available. We're not the experts in these
9 products, and so that's one of the reasons we're having
10 these discussions. And it's important that we get more
11 good reliable information to inform us as we make our
12 decisions.

13 Another key one is looking at other regulatory
14 programs. We have a lot of questions about this one.
15 Our fundamental regulations address the need to look at
16 other regulatory programs, both state and federal, and
17 we're required not to supersede those for the same
18 reason. That said, we're also -- our focus is
19 different than most other regulatory frameworks. The
20 easiest one to highlight is OSHA, for example, for
21 workers' safety. OSHA does a great job on what they
22 do. Their focus is very specific, on employees, and
23 they have certain constraints, and they're talking
24 about certain time frames.

25 Our focus is both for workers -- it doesn't

1 matter if you're an employee or not. Our focus is also
2 throughout the use of that product's life, both in the
3 home, in the workplace, at its end of life. So our
4 purview is much broader. And additionally, our purview
5 goes beyond looking at risk minimization, which is
6 typically what many other of our colleagues do, OSHA
7 being a good example, is because we're inherently
8 looking at hazard reduction as a way to potentially
9 reduce risk.

10 So if you assume that risk is hazard times
11 exposure, there's many ways to reduce risk. One of the
12 ways is through engineering controls with additional
13 measures such as education, et cetera. Those are all
14 very good things, but they're also very dependent on
15 human activity. Fundamentally, if you reduce the
16 hazards of that constituent, you're reducing the risks,
17 and maybe they're not as relied upon in the behavior.

18 And lastly, we do also look at the
19 availability of feasible alternatives. And depending
20 on the product, there may be some alternatives; there
21 may not be some known. And it's important to note that
22 in this process we are not, DTSC, predetermining an
23 outcome. We are not predetermining that any of these
24 products are going to be band or restricted for sale.
25 We are not determining that there is going to be a

1 safer alternative of X, Y, or Z. We're asking the
2 question --

3 MR. SCHUMACHER: I'm sorry. The Spanish
4 interpreter has just arrived. So if someone needs that
5 service, please come to the front. I'm sorry we're a
6 little late on this.

7 MR. PALMER: Back to the question, Is it
8 necessary? And we're asking through the alternatives
9 analysis process for that question to be answered.

10 So how do we pick the products that we picked
11 in the first round? We imposed upon ourselves in our
12 SCP regulations a requirement that we could name no
13 more than five priority products in the first round.
14 We chose three. The process was essentially -- we
15 internally in the state of California talked to our
16 sister/brother agencies about our program, what we're
17 doing, what we're trying to achieve, and asked them if
18 they knew things that they thought were a good fit,
19 based on their experience and purview and perspective.

20 We also asked, when we were out meeting in the
21 public, as we adopted the regulations and as we went
22 through this process, we would generally ask whether it
23 was an NGO, an industry group, an advocacy group, or
24 other government agency, "What do you think we should
25 be looking at?" And we did our own research, our

1 staff, essentially, looking at the hazardous
2 characteristics of the chemicals, the potential
3 exposure pathways in products, and we had a long list
4 of candidate potential priority products. And then we
5 did research on those.

6 We spent almost a year, essentially, looking
7 at data, doing literature reviews, talking to
8 folks, and coming up with our hierarchy of what we
9 thought were some good candidates. And ultimately we
10 used our discretion; because as I said earlier, there's
11 not an algorithm that says, You have to do it this way.
12 We had a fair amount of discretion, so we picked the
13 first three that we did. And, of course, we looked
14 into how it fit into other regulatory frameworks or
15 not.

16 So I'm sure you've seen these. These are our
17 first three candidates for priority products:
18 children's foam padded sleep products, paint strippers
19 containing methylene chloride, and spray polyurethane
20 foam systems with unreacted diisocyanates. Now, I'm
21 not going to spend much time right now going through
22 these because in the break-out sessions we're going to
23 go through this in more detail. We'll have plenty of
24 opportunity for people to give comment and ask
25 questions on these.

1 I did want to highlight a couple of things.
2 This process is a learning process for us, and it's not
3 done. So as we've collected information, had
4 discussions with many of you and others, we're refining
5 our perspective. So I just want to highlight a couple
6 of things that we've already changed. First and
7 foremost, we have put on all the profiles some
8 statements about what they are and what they're not.
9 They were a snapshot on March 13th of our perspective
10 on these things we were proposing. Those will change.
11 Our perspective is changing.

12 We also put in there are some attempts to
13 clarify that those documents were not one regulatory
14 documents. They were not a determination that an
15 alternative to that product was safer or better or
16 should be endorsed. And we also were saying that we're
17 not saying that the use of those products is restricted
18 in any way. We're still asking the question. We
19 recognize that our coming out with these products has
20 had a significant impact on many people, but we are
21 trying to frame that information so that people can use
22 it appropriately.

23 Ultimately we're going to take all this
24 information, and we're going to come up with our draft
25 rule-making package that we'll be using as a public

1 document saying, "These are proposals," and all the
2 supporting documents. So the priority product profiles
3 will essentially go away, and all the information that
4 we're collecting through this process will be evaluated
5 in a package for a final recommendation.

6 One thing we did do specifically for the SPS
7 system is we clarified that -- in our definition we
8 said roofing systems do not include the coatings that
9 go on those roofing systems, which contain TDI, HGI,
10 and some other isocyanides, so that changes the scope
11 of that perspective in that document.

12 And we also tried to clarify that our focus is
13 on the process and the uncured foam. We are not
14 focusing on the built environment and any potential
15 adverse impacts from the spray foam that's already
16 cured, the day after or two years later or whatever.
17 We're not looking at that. We're not making a
18 statement that it's safe or not. Our focus is really
19 as these things are being applied. And I should say
20 that for the other products as well, we've gotten a lot
21 of feedback from folks. We're churning through that
22 information, and we'll be doing similar types of
23 refinement as appropriate.

24 Another thing I wanted to highlight is it's
25 not specific to the process we're in right now, but

1 very soon we're going to be developing a three-year
2 work plan. That work plan is to be put in place by
3 October 1st of this year. We're going to have a
4 workshop this summer on this, and we'll be coming out
5 with a draft list of our -- or a draft work plan which
6 will identify categories of potential priority
7 products, which will be our menu for the next three
8 years that we'll pull from. And we have a lot of
9 latitude in that.

10 We'd like a lot of feedback. The intent of
11 that is to send messages to people so they can get a
12 heads-up saying, Hey. DTSC is considering some kind of
13 personal care product, for example, or some kind of
14 cleaning product or whatever -- and an opportunity for
15 those manufacturers and trade organizations and
16 interested parties to discuss with us what they think
17 might be a good selection or not. So stay tuned with
18 that. That's an important process.

19 I think if you combine that process with
20 looking at our candidate chemical lists -- I would
21 suggest that if you're a manufacturer of a product,
22 that you might want to look at that list of chemicals
23 and see if one of the chemicals you're using is on the
24 list. Because if it is, you might want no pay
25 attention to the work plan process and start looking

1 our question -- is it necessary? -- regardless of
2 whether we pick you or not.

3 A little bit about the alternatives analysis
4 process: The alternatives analysis is really the
5 regulatory process. It's specified in our Safer
6 Consumer Products Regulations, what an alternative
7 analysis is, what factors you must consider in the
8 process you have to go about in conducting an AA.
9 Ultimately, it's to answer that question, is it
10 necessary? It's there for the manufacturer of that
11 product to do -- look at all these factors that may not
12 have been considered in their existing business
13 process, many of which already have some kind of
14 alternatives analysis in place. This is broadening the
15 scope significantly for many people. So it's for their
16 use.

17 Then for our use in evaluating those
18 alternatives analysis saying, This is how we think we
19 should do it, and is it safer? And have you assured us
20 in some way that you're not moving to something that's
21 as bad or worse? So it's really informative for the
22 manufacturer. It's also informative for DTSC.

23 And what's entailed in an alternatives
24 analysis in our framework -- the California legislature
25 identified in the statute 13 broad criteria that we

1 must consider, that we put into our regulations. And
2 as you can see -- I don't know if you can read this or
3 not. I'm in the way for many people. It's everything
4 from, fundamentally, the function of that product -- it
5 has to work. If you're making a product that doesn't
6 work, that doesn't help anybody. Nobody's going to buy
7 it.

8 But it also looks throughout the useful life
9 of that product, cradle to grave. It also looks at
10 traditional things you might understand are certainly
11 environment impacts: air, water, soil. But it also
12 looks at economic impacts. It also looks at greenhouse
13 gas, energy efficiency. The list is long. It also
14 looks at extraction costs throughout the life cycle.

15 There are a variety of similar frameworks both
16 in this country and throughout the world, from reach
17 [phonetic] to Canada to here. Some other states are
18 looking at some other things. We're working with all
19 those communities to look at best practices and come up
20 with guidance to get through this process. Our
21 regulations that we adopted don't line up exactly,
22 perfectly with these. We tried to capture all these
23 things, but -- we asked people to consider a lot of
24 factors. So one of the key things is: How do you know
25 what's relevant? Does it make sense for us to look

1 this, and how broad and how deep do we go? We're in
2 the process of developing guidance. By the end of this
3 calendar year, we're going to be coming out with draft
4 guidance for how to conduct an alternatives analysis in
5 California. We'll be holding webinars, workshops, et
6 cetera; and our basic approach is going to be
7 developing tools, approaches, methodologies, options,
8 show some pilots and examples so that people can look
9 at this menu of things they have to consider and see
10 what works for their product and their process.

11 I put Homer up here because fundamentally it's
12 going to be just like it was in high school. You might
13 know the answer, but you have to show us your work.
14 What's your rationale? What's the process of thinking
15 that you're using in going through this process?
16 That's going to be key.

17 So ultimately -- and think a little bit of
18 time frame here. If late 2015 is when the alternatives
19 analysis process must start, that process also has time
20 frames in our Safer Consumer Products Regulations,
21 which are dictated as a two-part process, which can
22 take a year and a half or more. So we're talking now a
23 long time down the road potentially.

24 There are some options to move more quickly,
25 if a company has an alternative they think is the be

1 one and can move there. So there's a lot of options in
2 this process. But we're talking about over time, that
3 alternatives analysis will be given to us, and then we
4 have -- the legislature gave us a variety of options
5 that we can look at, and those include everything from
6 saying, "This looks great. Move forward," to "You
7 know, we're not sure. There's not enough information
8 for us here to understand your thinking. I think that
9 makes sense, so please give us some more," or give
10 consumers -- make information available to consumers.
11 Additionally, we could require additional safety
12 measures, and ultimately we can restrict or prohibit
13 sale of that product.

14 We also want to note that we can require an
15 end-of-life stewardship program for something that is
16 going to be a problem at its end of life, that might
17 need a collection or recycling or some kind of product
18 stewardship model.

19 And we also could say, "You know, we
20 understand this, that there's not a viable alternative
21 right now to this, but there needs to be some research
22 and some work looking at some potentially promising
23 things, and so we'd like you to do that." So that's
24 the menu of options that we have when we look at the
25 AAs that come in.

1 Okay. So a lot of stuff going on. Right now
2 we're moving towards initiating a rule-making to
3 formally adopt our priority products that will start
4 this fall. That process will take about a year. This
5 summer we're going to have a workshop on our priority
6 product work plan. We're going to be sharing that with
7 folks, and we would like input on that. And that will
8 be setting, you know, the path for the next few years.

9 We're also working on, as I said, developing
10 guidance for alternatives analysis. And I also wanted
11 to note that another thing we're working on, spending a
12 lot of time on, is developing a data system at DTSC
13 that will work through the Web to allow people to both
14 submit information to us, whether that's a formal
15 comment in the rule-making process or giving us data or
16 giving us their alternatives analysis ultimately, and
17 for us to share information, and for stakeholders to
18 search all the public information that we have. And a
19 key part of that is ensuring that we have a system that
20 can adequately protect trade secret and confidential
21 business information. So that's a big effort on our
22 part. I'm excited about it. And stay tuned, because
23 we think it will be helpful for everyone.

24 So ultimately the reason we're all here and
25 can all agree on is that we want to protect people a

1 the environment, and so this process is very important
2 for us, and we thank you for your input and your
3 presence here today. I want to note that we're asking
4 folks to give us any formal comment or data, if they
5 can, by the end of June; so that will give us time to
6 evaluate everything, take a look, and -- so in the fall
7 we can go for our rule-making package. The Safer
8 Consumer Products e-mail address there -- you can send
9 your comments, questions to that, and we'll get back to
10 you, if you have a question.

11 And our Web page has a lot of information on
12 it. We're working hard to make our Web page more
13 user-friendly and easy to navigate. If you have
14 comments on that, please feel free to give us
15 suggestions. Point us to some other Web sites that you
16 think work well, because we're actively trying to do
17 that as well. So I think that pretty much summarizes
18 my presentation. Thank you. And I'll turn it back
19 over to Nathan.

20 MR. SCHUMACHER: At this point we'd like to
21 hear any comments or questions you have about the
22 process, anything you heard and call upon in this
23 presentation that you'd like to comment on, et cetera.
24 And we'll have a mic -- a floating mic that will go
25 around.

1 Yes, sir? Right there. Just wait for a
2 second. The mic's coming.

3 MR. SINGARELLA: Good morning. My name is
4 Paul Singarella. I'm with Latham & Watkins, a law firm
5 here in California and across the country. We
6 represent a lot of companies that might potentially be
7 impacted by these regulations, and my questions really
8 relate to process. I think the agency is taking some
9 important steps to clarify what this process is and
10 what it is not. I think it's really important that you
11 continue to do that, because if you don't, you could
12 inadvertently precipitate a process that I don't think
13 you want right now, including the nature and scope of
14 comments on June 30, including perhaps some people
15 concluding that dispute resolution might be triggered
16 by the process you're in now. I don't think that's
17 what -- that's what you believe, including potential
18 appeals to the director.

19 You're probably familiar that your own
20 regulations have very significant process provisions
21 not in Article 3. I believe this is an Article 3
22 process. This initial priority products listing
23 process is covered under Article 3. But Article 7 has
24 a whole bunch of other things in it that seem to be
25 meant to apply to responsible entities after a decis

1 is made regarding that responsible entity. I don't
2 think we're there yet. I don't think you think we're
3 there yet. You've made some clarifications, but the
4 clarifications need to be further.

5 We need some confirmation here. And the
6 reason is, quite frankly, that these regulations have
7 never been applied or interpreted before. So here we
8 are. So I'm going to ask you to take some extra steps
9 that perhaps won't be warranted the next time you're
10 through this. But the first time you go through this,
11 you need to be very careful, in my mind. I think you
12 need to be very careful to protect your own interests,
13 and I think you need to be very careful to protect the
14 interests of all of us. So I would ask you for some
15 patience here as I lay this out.

16 I also want to observe that Article 7 is a
17 fairly interesting and maybe not unique, but somewhat
18 unusual provision of a regulatory scheme, in my
19 experience. I've been working with DTSC for over 20
20 years. I've been working with many other California
21 agencies for that same time frame. I've never seen
22 anything like this; okay? Your dispute resolution,
23 administrative exhaustion, all these provisions
24 codified -- wow. I've just never seen anything like
25 it.

1 So what I'm asking you to do shortly, soon,
2 today, if you can do it, and certainly in writing, is
3 to confirm that Article 7 does not apply to this
4 Article 3 process that we're in the middle of and that
5 will be ongoing until the end of the comment period
6 that you've announced.

7 I ask you to acknowledge and confirm that you
8 have not made decisions now -- you have not made
9 regulatory decisions now that would trigger the dispute
10 resolution provisions of Article 7. You don't want
11 that. We don't want it either. I think it's a simple
12 confirmation that would go a long way.

13 And thirdly, I would ask that you confirm that
14 the concept -- the principle of administrative
15 exhaustion, which is expressly contained in your
16 Article 7, does not apply to the current comment
17 period. I think if you do that, those three things,
18 building on top of the record that you've made, you'll
19 really be doing your job. I think we need clarity and
20 transparency, and we will know exactly where you stand,
21 if you're able and willing to do that for us. Thank
22 you.

23 MR. PALMER: Thank you, Paul. So I'm going to
24 attempt -- my counsel, Lynn Goldman, I believe is here
25 somewhere. Yes. So first, let me clarify that what

1 we're in now is not a formal regulatory process. This
2 is a voluntary process. We have not made a decision
3 about -- that I think the Article 7 applies to, because
4 we're in a predecisional, if you will, process of
5 trying to come up with the concept to move towards the
6 rule-making, which ultimately might be -- Article 7
7 might apply to.

8 But I appreciate your perspective, saying,
9 one, that you're reading the regulations -- thank
10 you -- and, two, that it is important that this whole
11 process is dictated by the provisions in our safer
12 consumer products regulations. We're not pulling this
13 out of a hat. I encourage everyone to read those
14 regulations. I'll stipulate that they're complex,
15 they're long, and they're deep, but it is the framework
16 with which we're all working.

17 So, Lynn, is there anything that you want to
18 add to that, or am I accurate?

19 MS. GOLDMAN: Yes. You're correct that the
20 dispute resolution doesn't apply to what we're doing
21 right now. We haven't made any decisions, so this
22 isn't triggered by that. And I do believe that that
23 article discusses when you would be using that process.
24 But we can discuss further.

25 MR. SCHUMACHER: Paul, is that the

1 confirmation you're looking for?

2 MR. SINGARELLA: I think you're getting there.
3 My asking was very specific, and I think you're getting
4 there. I would also ask you to write this up and put
5 it on your Web site. It's that important. We're
6 hearing it today.

7 MR. PALMER: Okay. Thank you.

8 MR. SINGARELLA: This is in addition to what
9 you said. What you've said today is great. I think
10 you're striving for the clarity that I'm asking for,
11 but I think it should be clear under no uncertain
12 terms.

13 MR. PALMER: Okay. Thank you.

14 I'll also point out, while we're talking about
15 the regulations and process, that there are other
16 provisions in the regulations which allow any
17 stakeholder to petition the department to add a
18 chemical, add a list. There is sort of a moratorium of
19 pulling anything off of it for the first two years, but
20 that process is open to everyone as well, so I would
21 encourage you to look at that, because if you think
22 there is information that you think we should be
23 considering and you have a lot of data for, we'll do
24 that.

25 MR. SCHUMACHER: Okay. Yes, sir? In blue.

1 The mic's coming around.

2 MR. BEASLEY: Good morning. Mike Beasley with
3 the Boeing Company. I just wondered if you would
4 expand a little bit on the process for adopting the
5 three-year work plan. I'm a little bit concerned about
6 the timing you've laid out with the late summer draft
7 and workshop and then, in October, adoption. That's
8 not a lot of time.

9 MR. PALMER: Thank you, Mike. Yeah, it's not
10 a lot of time. Our regulations require that we adopt
11 this by October 1st, and so we're working diligently to
12 come up with a document that we can share with everyone
13 and then workshop and then get people's feedback. And
14 again, that won't be the one shot. We'll be asking
15 people to give us comment informally.

16 But yeah, it is an important process. And
17 because the nature of identifying a category of
18 products is somewhat -- there's a lot of flexibility
19 there, and it means different things to different
20 people -- you know, you're in aerospace. Theoretically
21 we could identify missiles, rockets, and other
22 satellite devices, something like that. I don't think
23 that's likely.

24 But again, what does that mean to you? Why
25 would we consider a category? I think fundamentally

1 are still using the same criteria in the regulations,
2 so we are going to be identifying categories that we
3 think rise to a level because they meet or address one
4 of those criteria, whether it's a sensitive
5 subpopulation or the breadth of exposure or harm,
6 et cetera. So yeah, we really need people to
7 participate.

8 MR. BEASLEY: Just to follow up on that, so --
9 my question was more of the process. So you said
10 you'll take comments, and then you said informally. So
11 does that mean you're not going to go through a formal
12 process to adopt that work plan?

13 MR. PALMER: Yeah. It's not a rule-making, so
14 it's not the same process that we do with a
15 rule-making, where we have a formal process with a time
16 frame, where we respond to every comment. It's going
17 to be informal, and that -- we're going to say, "This
18 is the time frame. This is how we're going to do it.
19 We want everyone to comment, and we'll consider all of
20 these things." But it isn't constrained by the
21 Administrative Procedure Act.

22 MS. WILLIAMS: So, for instance, we don't have
23 to respond to all comments?

24 MR. PALMER: Yeah. For example, we don't have
25 to respond to every comment on the work plan. We're

1 going to look at those and say, What's valuable here?
2 We may not respond to every one of them as we have to
3 do in the ABA process.

4 MS. WILLIAMS: The other thing is that in
5 terms of the process, we don't have to accommodate.

6 MR. PALMER: Yes. And as Meredith Williams,
7 my deputy director here, pointed out, I highlighted our
8 data system we're working on. We will have in place by
9 that time a comment process where you can submit a
10 comment, you can see all the comments that are
11 submitted, and you can search on those. And that will
12 help us as well to make sure we address all the
13 comments and we get through them.

14 MR. BEASLEY: One final follow-up on that. So
15 for the CEQA process, you're saying that you don't have
16 to do CEQA at that time? It's not until you actually
17 pull from that list?

18 MR. PALMER: Correct. The CEQA process will
19 apply when we adopt the priority product regulation.
20 Every product we do will go through CEQA, and that's
21 when that will apply.

22 MR. SCHUMACHER: Yes, sir, in the gray coat in
23 the back.

24 MR. SERIE: My name is Tim Serie, and I'm with
25 the American Coatings Association. We represent pai

1 and coatings manufacturers and raw material suppliers
2 in the U.S. I'd like to make a few general points
3 about the process, and I think it builds off of what
4 Paul said.

5 Number 1, we need to be very cognizant of
6 where we're at in the process right now. We are at
7 the -- in the listing phase. We're not going through
8 the alternatives analysis. We, of course, need to keep
9 in mind some of the regulatory responses that are
10 available to the agency, but step one is going through
11 that process of listing. And from what we've seen in
12 the priority product profile -- and again, we
13 understand this is a preliminary document -- is really
14 a lack of focus.

15 And so if you look at methylene chloride-based
16 paint strippers, for example, every single possible
17 exposure or potential exposure scenario or significant
18 and widespread impact is listed in that document. What
19 we don't see is the executive summary linking the
20 potential exposure and significant or widespread
21 impacts with the listing and explaining why this
22 product has been proposed as a priority product. And
23 this will be very important as the listing process
24 proceeds because everything flows out of the listing
25 process. So if the focus is on worker occupational

1 exposure, then the alternatives analysis and the
2 ultimate regulatory responses will flow out of that, or
3 if the focus is on drinking water impacts or air
4 emissions. So we urge the agency to clearly articulate
5 why this priority product is being listed and why the
6 other priority products are being listed.

7 And then along the same lines, after focusing
8 on why the product's being listed, then the agency, of
9 course, has to go through all the steps that are
10 outlined in Article 3. And one of these which we feel
11 is critically important is considering the scope of
12 other California and federal laws and regulations that
13 impact this product and the potential regulatory
14 responses that are available to the agency.

15 So we believe that for each potential exposure
16 and each potential impact, the agency must identify all
17 other regulatory programs that touch on this and
18 explain why these overlapping or potentially
19 conflicting regulations would meaningfully enhance the
20 protection of human health and the environment. And
21 even then, if you look at the enabling bill, there are
22 some serious jurisdictional questions about how the
23 ultimate regulatory responses could overlap with other
24 regulations.

25 And, Karl, we appreciate that you provided

1 some insight into how the agency believes this
2 regulatory program is different than other regulatory
3 programs, but we still think that you have to go
4 through the exercise, identify every single regulation
5 that's out there, and then explain why this listing is
6 still necessary. So -- and thank you very much for --
7 I think you all already have been responding to some of
8 our comments from the workshop, so we appreciate that.

9 MR. PALMER: Thank you, Tim. Just real
10 briefly, we'll consider all those comments. I would
11 say that it's an important point of what phase we're
12 in. Many folks want to jump right to an answer to the
13 question through the AA process. We don't know what
14 that's going to be.

15 But I also would point out that once we get
16 the listing done, that the responsible entity is still
17 required to address all relevant factors in the AA,
18 notwithstanding that it might not have been the No. 1
19 reason for listing. You still have to consider all
20 those impacts. They may not relevant, or they may be a
21 lesser impact, but that's what that process is for. So
22 thank you.

23 MR. SCHUMACHER: Yes, sir, right here in the
24 striped shirt. The mic is coming around.

25 MR. MONIQUE: My name is Mark Monique. I'm

1 with The Savogran Company. We make paint removers. I
2 just wanted to, you know, throw out that in our
3 particular category, you know, most of the companies
4 are small, family-run businesses, and I think that
5 needs to be considered when you start developing the
6 regulatory process for the alternatives analysis, that
7 you don't want to make the process so burdensome that
8 these companies can't comply with it and come up with
9 an alternatives analysis, because, you know, a lot of
10 these companies aren't very deep with regulatory staffs
11 to handle these issues. So that would be my comment.

12 MR. PALMER: Thank you, Mark. Yeah, that's an
13 important point; and we understand that, and we
14 appreciate that. As we go through developing the
15 guidance for the alternatives analysis process, it's
16 our hope that when we get into that and through that,
17 we will be working with particularly medium- to
18 small-sized businesses to look at those tools and
19 processes and methodologies that they can use. It's
20 different from a small business to a Fortune 500
21 company that's been doing this and has a staff of
22 toxicologists and product safety folks, so we do
23 understand there's, on the ground, a difference. Thank
24 you.

25 MR. SCHUMACHER: Yes?

1 MS. BLACKMON-BHAGAT: Hi. My name is Traci.
2 I'm a consultant. Are you working with any other state
3 so that companies who are in multi states can comply
4 with all the states that want to not -- like we're
5 doing currently for Prop 65 here, VOC requirements
6 here; then when you go to another state to sell it, you
7 have to comply with another requirement?

8 MR. PALMER: Yeah. Thanks, Traci. We work
9 with many other states on many different levels to
10 different degrees. So on a policy standpoint, we work
11 through the Environmental Council of the States. We
12 work with U.S. EPA and its various work groups. In the
13 alternatives analysis process, the Interstate Chemicals
14 Clearinghouse process, we've been actively involved.
15 BizNGO, for example, has an AA framework.

16 We, to the extent we can, have been engaged in
17 those. The frameworks state to state are different
18 somewhat; but it's our hope that in the community of
19 practice for these concepts, both in policies that get
20 developed and best practices, that we are not trying to
21 reinvent the wheel. We are going to take best
22 practices and incorporate them here. But our scope of
23 process is generally larger than anyone else's, so
24 we'll be developing things that I'm pretty confident
25 other states are looking at and will, you know, poin

1 to as they can. So absent a federal framework that
2 dictates the same thing we're doing, there's the fairly
3 good network of folks talking. But there's a lot of
4 different things going on.

5 MS. BLACKMON-BHAGAT: And I said that because,
6 as this gentleman said, I work with a lot of small
7 mom-and-pop businesses, and they're saying that if
8 California is going to do this, let's just pick up shop
9 and move to Arizona, you know? It's very easy for them
10 to do that.

11 MR. PALMER: Understood. We're trying to make
12 this as transparent as possible. And it is a global
13 economy. It's not just other states. It's other
14 countries that are interested. There's a lot going on
15 in the EU. So we're aware of that within our authority
16 and responsibility. We're doing the best we can to be
17 informed by those and try to communicate with a lot of
18 those folks.

19 MS. WILLIAMS: What dictates compliance is not
20 whether they're manufacturing here, but whether they're
21 sold.

22 MR. PALMER: That's a good point. So the way
23 our regulatory structure works is we are regulating
24 products that are offered or sold in California. So
25 the manufacturer that makes that product may sell it

1 multiple states. We only have purview in California.
2 But that doesn't mean that that manufacturer, if
3 they're in Wisconsin -- they still have to comply with
4 California law when they sell it here.

5 Now -- and our framework is such that if that
6 manufacturer doesn't really want to comply with our
7 law, then we go to the next phase down, which is the
8 person importing that product into California.

9 Ultimately, if they don't want to comply, then we'll go
10 to the people that -- at the retail level who sell that
11 product. So there's sort of a responsibility framework
12 there, which is designed to capture anything that comes
13 into California.

14 MR. SCHUMACHER: So in other words, moving to
15 Arizona does not avoid this law.

16 Yes, sir?

17 MR. COLLATZ: Karl, Mark Collatz with the
18 Adhesive and Sealant Council. First of all, I'd like
19 to thank you for the presentation. This is the first
20 opportunity I've had to be at one, and it did provide a
21 lot of information.

22 I have one question that, granted, is probably
23 a bit theoretical, but I haven't really heard it
24 addressed in anything that you've written so far or
25 talked about, the question being that if a company h

1 a -- ends up with a priority product, it goes through
2 the assessment to eliminate the chemical of concern.
3 Possibility that as the list of chemicals expands, that
4 that product is brought back in for a second assessment
5 or a third assessment or a fourth assessment? Is that
6 a possibility?

7 MR. PALMER: We're going to be looking at
8 doing a very specific listing at a specific point in
9 time with a specific chemical that won't apply down the
10 road. I mean, if you come into the market with that
11 same chemical and product as defined, yes, you'll be
12 subject to regulation, but we're not going to be
13 continually tweaking that perspective. That doesn't
14 mean that we couldn't, down the road, if we thought it
15 was appropriate and rose to a level of concern, that we
16 could do another listing to change the definition and
17 pull something in. But yeah, it's not a rolling,
18 continuous --

19 MS. WILLIAMS: And the alternatives analysis
20 looks for safer alternatives that we won't be expected
21 to show on our list.

22 MR. PALMER: Right. And our hope is that the
23 process is going to be moving us in a safer direction
24 so we won't have a regrettable alternative down the
25 road.

1 MR. COLLATZ: I think my question, though,
2 was, even if that wasn't the alternative -- let's say
3 you've got your list of 153 chemicals that you're
4 really working off of now, but there's still that other
5 900 and whatever that you're really not looking at
6 right now but will be sometime in the future. Let's
7 say, you know, the product in question meets the
8 alternatives analysis, but now there's another chemical
9 that's on that list farther down the road and you've
10 expanded your list of what you're looking at. It could
11 conceivably then be brought back in to eliminate that
12 chemical as well, then?

13 MR. PALMER: Well, to be clear, that first
14 restriction on the 153 was just for the first round of
15 selection, and down the road it's 1100-plus, and that
16 list is continuously changing. If a separate chemical
17 came onto the list that wasn't on here, we would have
18 to then specifically identify that chemical if we
19 wanted a new list.

20 MR. COLLATZ: Could -- farther down the road,
21 as we get into more of these priority products, could
22 there be a priority product that would have multiple
23 chemicals that it would have to do an alternatives
24 analysis for?

25 MR. PALMER: Yes. And certainly, we've hea

1 in some of our -- both -- for example, in the
2 foam-padded sleep products we've named one flame
3 retardant. There's been some suggestions that we
4 should look at more flame retardants. We can do that
5 now, but they're on a short 153 list. And out here we
6 can name anything on the list. But we're not
7 restricted by one chemical and one product. It could
8 be multiple chemicals.

9 And certainly -- I want to point out, too,
10 that when you look at our list, the 1100 chemicals
11 includes some classes of chemicals. So whether you're
12 talking P and A's or something -- you know, there's a
13 similar class of chemicals that might be named, because
14 some of the list that we referenced don't name one CAS
15 number for one chemical, but it could be a class of
16 chemicals. So there are really more than 1100 specific
17 chemicals, although many of them are similar.

18 MR. SCHUMACHER: Yes, to the woman here on the
19 aisle, and then you're next.

20 MS. ALIMONY: Hi. Elise Alimony [phonetic]
21 with the American Chemistry Council. Could you
22 clarify -- rewind about three minutes and tell me, the
23 150-some chemical list was only for the first three to
24 five products through the process?

25 MR. PALMER: Yes.

1 MS. ALIMONY: And when you go for six and
2 beyond, you're back to the big 1100 list?

3 MR. PALMER: That's correct. The initial list
4 was restricted to 153. The list as proposed now is
5 three products. Subsequent proposed lists, we could
6 choose from the broader menu of --

7 MS. ALIMONY: So it wasn't a permanent
8 narrowing down?

9 MR. PALMER: That's correct. Just for the
10 first phase.

11 MS. WILLIAMS: The work plan.

12 MR. PALMER: Again, when we talk about the
13 work plan this summer, that's for the whole 1100
14 chemicals on the menu, if you will. Thanks.

15 MR. SCHUMACHER: The mic is on its way.

16 MR. LORENZ: No problem. Thank you.

17 Will Lorenz with General Coatings. My
18 question is twofold on the process. You mentioned that
19 there's a hierarchy of chemicals that you chose the 153
20 from and then ultimately the three priority products.
21 Is there also a hierarchy for hazard trait? And have
22 you developed one?

23 MR. PALMER: No, there's not. Again, there's
24 no algorithm. There's no weighting specifically of
25 these hazard traits: Here's the one tier, two tier,

1 three tier. So in some sense, whether it's a
2 carcinogen, a mutagen, an endocrine disrupter, there's
3 no value statement there. Where there is some
4 weighting is in the factors for special consideration
5 for our sensitive subpopulations, specifically -- and
6 we have a little bit of flexibility there, but that's
7 pretty much it.

8 MR. LORENZ: Okay. And then my second
9 question: Under -- you mentioned risk minimization.
10 Is there also a framework that you're going to provide
11 with regard to hazard reduction or hazard trait so that
12 we understand what you're meaning specifically as far
13 as what reduces the hazard trait of any of these
14 compounds on the list or just in framework kind of
15 going forward so we can understand how -- ultimately to
16 comply with what you're looking at, if elimination is,
17 let's say, not the first step and we have to look at
18 some of the other possibilities?

19 MR. PALMER: Yeah. Thank you, Will. It's a
20 good question. And a fundamental difference between
21 this approach and many others is that we are not
22 looking at a specific threshold, a specific point of
23 departure number, as in one in a million cancer risk to
24 which you say, Oh. I can risk that. We're asking
25 folks to balance a lot of different factors. And so

1 ultimately the person doing the alternatives analysis
2 is the one responsible for making that value judgment,
3 if you will, which is going to be weighing sometimes
4 conflicting or disparate factors.

5 So, for example, spray foam -- we know that
6 spray foam has many great attributes as a -- in
7 benefiting energy conservation. How does that weigh
8 against toxicity? Those are two factors that are very
9 different. And if you look at some other functional
10 alternative, say, fiberglass, for example -- fiberglass
11 has certain R-value properties. It may not have the
12 long-term R-value, or whatever term you use, and they
13 may have other attributes. It also has some potential
14 hazard traits as well in terms of dermo and inhalation
15 exposure.

16 So what you're doing is this menu of all these
17 factors, and you coming up with some assessment of how
18 you're going to weigh those and how you're going to
19 change your product to shift that to, hopefully reduce
20 risk. It's probably more of an art form and an
21 iterative discernment process than an algorithm that
22 says, Yes, now I can crank out this number, which is a
23 little bit less than that number. And it is new.

24 MS. WILLIAMS: Meredith Williams, DTSC.
25 Another thing I would encourage you to look at is th

1 information on OEHHA's Web site, the Office of
2 Environment Health Hazard Assessment. That's a sister
3 agency. And we relied heavily on their experience and
4 expertise to define our hazard traits. They're not the
5 only thing that defines our hazard traits, but they
6 have a fair amount of documentation available as to how
7 these hazard traits are defined.

8 MR. LORENZ: Thank you.

9 MR. SCHUMACHER: Yes, sir, in the front here.

10 MR. BRUSKOTTER: Good morning. My name is
11 Karl Bruskotter. I'm with the City of Santa Monica,
12 and I'm thinking outside this process and further down
13 the line. Let's say we get through these three
14 priority products and everyone in the room is
15 relatively happy with the way it went at the end of the
16 day, and we're going to start to put new products in
17 our Netflix queue. I picture this whole thing as a
18 Netflix queue at the end of the day. So how is that
19 going to work? Are you going to put three in the
20 queue, or are you going to put five because it went
21 really well? Or how is it going to work out in the
22 future?

23 MR. PALMER: Thanks, Karl. That's a good
24 question. We don't know, to be honest. Our hope is
25 that through this process we learn and we figure out

1 how to do this well and better the next time so that we
2 can expand. Ultimately, we want to do a good job. We
3 want to be as director -- our now former director, when
4 we were adopting the regulations -- the framework that
5 she put out is that they were meaningful, practical,
6 and legally defensible. And in that practical realm
7 there is where we want to balance the meaning of
8 wholesale.

9 We hope to expand it and make your queue
10 bigger, but we're not sure the bandwidth we're going to
11 have to do it, because this is a long process. Because
12 as we move through this product selection process, then
13 we're going to be in the alternatives assessment
14 process, which is also new.

15 And as one of the gentlemen said, we'd like to
16 help small and medium-sized businesses to get through
17 the process. Then we're going to be into looking at
18 regulatory responses. Meanwhile we're still queuing
19 up. So we're in it for the long haul. How it will
20 ramp up and how that will work out, I'm not quite sure
21 now.

22 MS. WILLIAMS: Meredith Williams again.

23 So that is one of the things that we're doing
24 very carefully in the program right now, because
25 everything is new. Everything is the first time.

1 We're tracking the resources it takes to do this job,
2 and the legislature has asked us to be very meticulous
3 in doing so, so that should we decide that we want to
4 be able to move through that queue quicker, we can tell
5 them what kind of resources would be required for us to
6 be able to do that.

7 MR. BRUSKOTTER: Thank you.

8 MR. SCHUMACHER: Again, we haven't heard from
9 the back of the room very much. So if you're toward
10 the back, you have an opportunity.

11 Yes, sir? On the aisle.

12 MR. MANYANI: Good morning. Bruce Manyani
13 [phonetic]. I'm representing SPFA. In the past
14 workshops we've pointed out that there are some errors
15 and misinformation on the Web page regarding spray
16 foams, and you've made a point to stress that you're
17 not making any determinations, yet on your FAQ and the
18 facts sheet, it still recommends use of alternatives
19 when looking at using an SPF product. It seems to me
20 that that's a determination, and it's having serious
21 impacts in the marketplace. And I think you've heard
22 those stories at the other workshops, and the stories
23 continue to grow, and it is a continued concern for the
24 industry, that these haven't been fixed at this point.

25 When you do come around to making those

1 corrections, I think it's more -- the further you go
2 down the road, it becomes exacerbated. There's a
3 multiplier that keeps taking place without the
4 corrections. And when you do make those corrections,
5 if you do make those corrections, they need to be
6 explicit. They need to be more widely noticed than
7 what you're doing right now. They need to be
8 conspicuously placed on DTSC's Web page, because you
9 need to reach all those people that you've prejudiced
10 with your misinformation at this point, and I think
11 that's critical. Thank you.

12 MR. PALMER: Thank you, Bruce. As I mentioned
13 earlier, we did amend, put some language in the
14 profiles. We will take a look at the FAQs and the
15 facts sheet. We appreciate your perspective. One good
16 thing is that this is our last workshop, so we'll
17 hopefully have some time to go back and not only
18 address the clarity issue, but I think how -- we have a
19 lot of information on our Web page, so we are very
20 cognizant that there may be some better ways to more
21 effectively communicate that. So we are going to work
22 on that. And if you have any specific suggestions,
23 other than "make it better," we would be happy to hear
24 those. Thank you.

25 MR. MANYANI: I think we did provide you wi

1 some written comments; and if we failed to do that, we
2 will get them to you because they're quite extensive.

3 MR. SCHUMACHER: Okay. We need to break at
4 this point.

5 Sir, is it a general concern, or is it
6 specific to spray foam, perhaps? General? Okay. You
7 have -- I'm going to give you two minutes. Go ahead.

8 MR. NORMAN: Hi. Caffey Norman. Squire,
9 Patton & Boggs. I'm just wondering -- you said -- in
10 December of 2014, I believe you said you are going to
11 put out a methodology for conducting the alternatives
12 analysis. I just wanted to clarify if that's the case
13 and find out, will it be a definite methodology that
14 each responsible party will be able to follow, like a
15 checklist, or -- and if not, how will you compare the
16 different analyses that you receive? I'm just very
17 confused about that.

18 MR. PALMER: It won't be a step-by-step
19 checklist, "This is how you do it" document. It's
20 going to be a compilation of tools, approaches,
21 methodologies, and examples. It's up to the
22 practitioner of the alternatives analysis to look at
23 our regulations and say which -- you know, how they're
24 going to meet the criteria, what's relevant or not.
25 There's a lot of discretion, and we're going to be

1 looking at those documents based on what that
2 practitioner tells us they've decided.

3 So even within one product category, you could
4 have multiple manufacturers taking different
5 approaches, because the reality is that if your plant
6 is in the Mississippi River Delta versus in Arizona,
7 the impacts on surface water from your process might be
8 different. So there are a lot of factors there, and
9 there's no one cookbook way to do it. There's a menu,
10 and there will be lots of ways to make the entrée.

11 MS. WILLIAMS: And because there is so much
12 flexibility, we're working hard to think about how to
13 deliver the guidance, the alternatives analysis
14 guidance, because it won't be one size fits all. And
15 there will be organizations, companies that have
16 tremendous expertise, experience with the alternatives
17 analysis process, and they don't need the same kind of
18 information as the smaller entities that will be
19 undertaking this. So we have to give guidance that
20 works for all of those parties.

21 Also, we're going to be leveraging the
22 existing body of work heavily. We've participated in
23 the IC2 process for alternative analysis. We'll make
24 reference to that. We'll give people easy ways to link
25 to that and provide those resources. So a lot of it

1 going to be compiling resources and directing people to
2 existing processes and giving them some context of how
3 those processes work or don't work for the California
4 requirements.

5 MR. SCHUMACHER: Okay. We are now breaking.
6 Those of you who are interested in the paint stripper
7 containing methylene chloride, please take about ten
8 minutes. You'll be in this room after everyone has
9 left. So please take ten minutes or so to go to the
10 bathroom, use your cell phone, or whatever.

11 The spray polyurethane foam systems group will
12 be in the boardroom. Go out of this room, go down the
13 hall to the lobby, take a right, and it will be on the
14 right-hand side there. It should be fairly easy to
15 find.

16 Also, the last group, the children's
17 foam-padded sleeping products will be right next door
18 in A. So you have about ten minutes to make your way
19 to where you want to be. Thank you very much.

20 (End of proceedings at 10:42 a.m.)

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CERTIFICATE
OF
CERTIFIED SHORTHAND REPORTER
* * * *

The undersigned Certified Shorthand Reporter
of the State of California does hereby certify:

That the foregoing Proceeding was taken before
me at the time and place therein set forth.

That the testimony and all objections made at
the time of the Proceeding were recorded
stenographically by me and were thereafter transcribed,
said transcript being a true and correct copy of the
proceedings thereof.

In witness whereof, I have subscribed my name,
this date: June 19, 2014.



STEPHANIE LESLIE, CSR No. 12893

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