

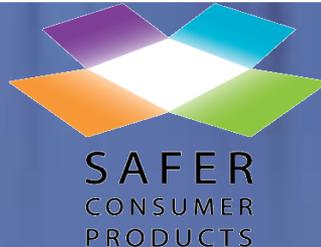


Children's Foam Padded Sleeping Products Containing Tris(1,3-dichloro-2-propyl) Phosphate (TDCPP)

**Christine Papagni, Senior Environmental Scientist
Safer Consumer Products Branch**



California
Environmental
Protection Agency



Department of
Toxic Substances
Control



Topics for Discussion

- Proposed Priority Product Description & Exclusions
- Chemical of Concern in the Product
 - Hazard
 - Exposure Considerations
 - Alternatives
- Market Information

Proposed Priority Product

Children's Foam Padded Sleeping Products with TDCPP



SAFER
CONSUMER
PRODUCTS



DTSC

Children's Foam Padded Sleeping Products Containing TDCPP

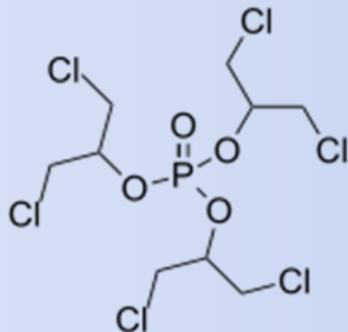
The Products

- Nap mats & cot pads
- Sleep positioners
- Travel beds
- Infant car bed pads
- Portable crib pads
- Bassinet foam
- Play pens or play yards
- Co-sleepers & bedside sleepers*



The Chemical

- Chlorinated Tris or TDCPP
- A flame retardant



SAFER
CONSUMER
PRODUCTS



DTSC



Proposed Exclusions

Other similar products that are excluded:

- Mattresses (as defined and covered by the requirements of CPSC 1632/1633) or products containing mattresses.
- Furniture covered by the requirements of California TBI 17-2013.
- Car seats covered by the requirements of Part 571 FMVSS Standard No 302.



SAFER
CONSUMER
PRODUCTS



DTSC



Why TDCPP?

Hazards

- Carcinogenicity
- Developmental Toxicity
- Reproductive Toxicity
- Endocrine Disruption
- Neurotoxicity
- Kidney and liver damage
- Sensitive subpopulations may include children and daycare workers



Why TDCPP?

Exposure Considerations

- Exposure via inhalation, ingestion, and dermal contact
- Not chemically bonded to foam
- TDCPP is semi-volatile and adsorbs to dust
- Has been widely detected in homes, offices, and daycare facilities
- Detected in children's handwipe samples
- Found in S.F. Bay water and sediment, U.S. streams, and fish and birds



SAFER
CONSUMER
PRODUCTS



DTSC



Why Children's Sleeping Products?

- TDCPP detected in various children's products
- Widely available to consumers in California
- Infants and children spend many hours sleeping
 - Dust inhalation while sleeping
 - Dermal absorption
 - Hand-to-mouth ingestion
- No regulatory requirements to include chemical flame retardants



SAFER
CONSUMER
PRODUCTS



DTSC



Are There Alternatives?

- Is it necessary?
- No U.S. or California regulatory requirements
- Use a different chemical flame retardant?
- Eliminate the use of chemical flame retardants?



SAFER
CONSUMER
PRODUCTS



DTSC



Market Information

- TDCPP is a high production volume chemical
- Approximately 10 to 50 million lbs/year TDCPP produced in the U.S.
- Only one known U.S. manufacturer of TDCPP
- TDCPP is one of the most widely used flame retardants in polyurethane foam
- Chlorinated flame retardants are widely used in children's products



SAFER
CONSUMER
PRODUCTS



DTSC



Topic I: Priority Product Description

1. Are the definition and terms clear and unambiguous as to which related products are included or excluded?
2. Are there GPC GSI brick codes that would be helpful in characterizing this product?
3. Are there other considerations for this Priority Product description that DTSC should know about?



Topic 2: Chemical of Concern and Alternatives

1. Are there other Candidate Chemicals in this product that you suggest be considered?
2. Are there functionally acceptable alternatives to this Priority Product?
 - a. Are they commercially available?
 - b. Do they require the use of a replacement chemical?
 - c. Are there known hazards associated with these alternatives?
 - d. Are any potential replacement chemicals listed as Candidate Chemicals?





Topic 3: Market Information

1. What is the market presence of the Priority Product?
2. How is the Priority Product marketed and/or sold?
3. What types of businesses are involved in the supply chain for manufacturing the Priority Product?



Needed Market Information

- Major suppliers of polyurethane foam to children's sleeping product manufacturers?
- Major foreign and domestic manufacturers of children's sleeping products?
- How many children's foam padded sleeping products with TDCPP are sold in California?
- Foreign TDCPP manufacturers?
- Import of TDCPP and/or children's foam padded sleeping products in California?



How to Comment

We encourage written comments to be submitted by June 30, 2014.

➤ SaferConsumerProducts@dtsc.ca.gov

Thank you.



DTSC

Next Steps

TIMELINE

March 13, 2014

Draft Initial Priority Products List
(Up to 5 Products)

May / June 2014

Priority Product Workshops

Projected: Late 2014

Begin Rulemaking on Proposed
Priority Products List

Public Comments/Public Hearing

Within one year of
rulemaking start

Final Priority Product List
(Adopted through Rulemaking)

Regulatory reporting
requirements begin

Notification of
responsibility for
Priority Product
(Up to 60 days)

Preliminary
Alternatives
Assessment Rprt
(Up to 180 days)

- REGULATOR
- RESPONSIBLE ENTITY
- STAKEHOLDERS
- DOCUMENT
- INPUT
- PROCESS