



DTSC'S Initial Proposed Priority Products List for the Safer Consumer Products Program

March 13, 2014

Under the Department of Toxic Substances Control's (DTSC) Safer Consumer Products regulations, DTSC must publish an initial proposed Priority Products list by March 28, 2014. *This draft list imposes no new regulatory requirements on product manufacturers until DTSC finalizes it by adopting regulations and includes the following Priority Products:*

- [Paint and Varnish Strippers, and Surface Cleaners containing Methylene Chloride](#)
- [Spray Polyurethane Foam Systems containing Unreacted Diisocyanates](#)
- [Children's Foam-padded Sleeping Products containing TDCPP](#)

A description of the Priority Product is described below. For further information on these Priority Products, please visit <https://dtsc.ca.gov/SCP/Priority-Products/>. If you have questions or comments about this draft list to DTSC, please send them via email to: SaferConsumerProducts@dtsc.ca.gov



Priority Product Name: Paint and Varnish Strippers, and Surface Cleaners containing Methylene Chloride

Priority Product Description

This includes all paint and varnish removers, paint and varnish strippers, and surface cleaners that contain methylene chloride. This includes, but is not limited to, products described under the Global Product Classification (“GPC”) System and assigned to “Brick 10002501”(1):

“...any products that may be described as a chemical substance designed to break down paint or varnish to facilitate its removal from a surface. These products may be designed for indoor or outdoor use, and can be used to remove varnish or paint from any chosen surface. This product category includes products such as Paint Stripper, Cleaning Solvents and Paint Solvents. This product category excludes products such as Paints, Special Purpose Paints, and Paint Additives/Enhancers, as well as Sandpaper and other Abrasives.”

Candidate Chemical(s) and respective hazard trait(s)

Methylene chloride (Chemical Abstract Service Registry Number (CAS RN): 75-09-2):
Carcinogenicity, neurotoxicity, dermatotoxicity, ocular toxicity, cardiovascular toxicity, hepatotoxicity and digestive system toxicity, respiratory toxicity

Deadline for Preliminary Alternatives Analysis

To be determined. The deadline for the Preliminary Alternatives Analysis will be dictated by the effective date of the regulations designating this product-chemical combination as a Priority Product.



Priority Product Name: Spray Polyurethane Foam Systems containing Unreacted Diisocyanates

Priority Product Description

Spray polyurethane foam systems for use as insulation, roofing, sealing, filling of voids and gaps, and for other uses such as in the creative arts that contain any of the diisocyanates listed under *Chemicals of Concern and Respective Hazard Traits*, below.

Under the Global Product Classification (“GPC”) System, these SPF systems may be assigned to the following bricks (GS1, 2013):

Brick 10002456 Insulation – Loose Fill/Spray Foam: Includes any products that may be described/observed as a form of insulation poured or blown into cavities to reduce heat loss. These products when applied correctly can virtually eliminate energy wasting air filtration in lofts. Excludes products such as rigid foam board.

Brick 10002692 Roofing Other: Includes any products that may be described/observed as Roofing/Exterior Trim products, where the user of the schema is not able to classify the products in existing bricks within the schema. Excludes all currently classified Roofing/Exterior Trim products.

This Priority Product designation includes any SPF systems containing the specified diisocyanates, whether professional grade or DIY products. Use of GPC Brick codes, where available, to identify California’s Priority Products, may assist stakeholders in identifying such products. However, all SPF systems placed in the stream of commerce in California are classified as a Priority Product if they contain the specified diisocyanates, regardless of whether the manufacturer has assigned them to Brick 100024356 and 10002692 of the GPC.

Candidate Chemical(s) and respective hazard trait(s)

- Generic Methylene diphenyl diisocyanate (MDI) mixed isomers, CAS RN: 26447-40-5: Respiratory toxicity
- 4,4'-methylenediphenyl diisocyanate, CAS RN: 101-68-8: Respiratory toxicity
- Toluene Diisocyanates, mixed (TDI), CAS RN: 26471-62-5: Respiratory toxicity, carcinogenicity
- 2,4-Toluene diisocyanate, CAS RN: 584-84-9: Respiratory toxicity, carcinogenicity



- 2,6-Toluene diisocyanate, CAS RN: 91-08-7: Respiratory toxicity, carcinogenicity
- Hexamethylene-1,6-diisocyanate (HDI), CAS RN: 822-06-0: Respiratory toxicity

Deadline for Preliminary Alternatives Analysis

To be determined. The deadline for the Preliminary Alternatives Analysis will be dictated by the effective date of the regulations designating this product-chemical combination as a Priority Product.



Priority Product Name: Children’s Foam-Padded Sleeping Products containing TDCPP

Priority Product Description

This Priority Product includes the following sleeping products containing polyurethane foam and tris(1,3-dichloro-2-propyl) phosphate (TDCPP):

- Nap mats with polyurethane foam
- Juvenile product pads in soft-sided portable cribs
- Infant travel bed foam
- Portable infant sleeper foam
- Playard foam
- Play pen foam
- Bassinet foam
- Nap cots with foam pads
- Car bed foam pads
- Foam sleep positioners

Candidate Chemical(s) and respective hazard trait(s)

Tris(1,3-dichloro-2-propyl) phosphate (TDCPP), CAS RN: 13674-87-8: Carcinogenicity, genotoxicity, developmental toxicity, reproductive toxicity, endocrine toxicity, neurotoxicity, hepatotoxicity and digestive system toxicity, nephrotoxicity and other toxicity to the urinary system, hematotoxicity, ocular toxicity, dermatotoxicity

Deadline for Preliminary Alternatives Analysis

To be determined. The deadline for the Preliminary Alternatives Analysis will be dictated by the effective date of the regulations designating this product-chemical combination as a Priority Product.