



OPPT's Chemical Assessment & Management Program (ChAMP)

**Ellie Clark
Office of Pollution Prevention & Toxics
U.S. EPA
April 8, 2008**



Overview

- U.S. commitments under SPP
- ChAMP
- HPV screening decision process
- MPV process
- Inorganic HPVs
- TSCA Inventory

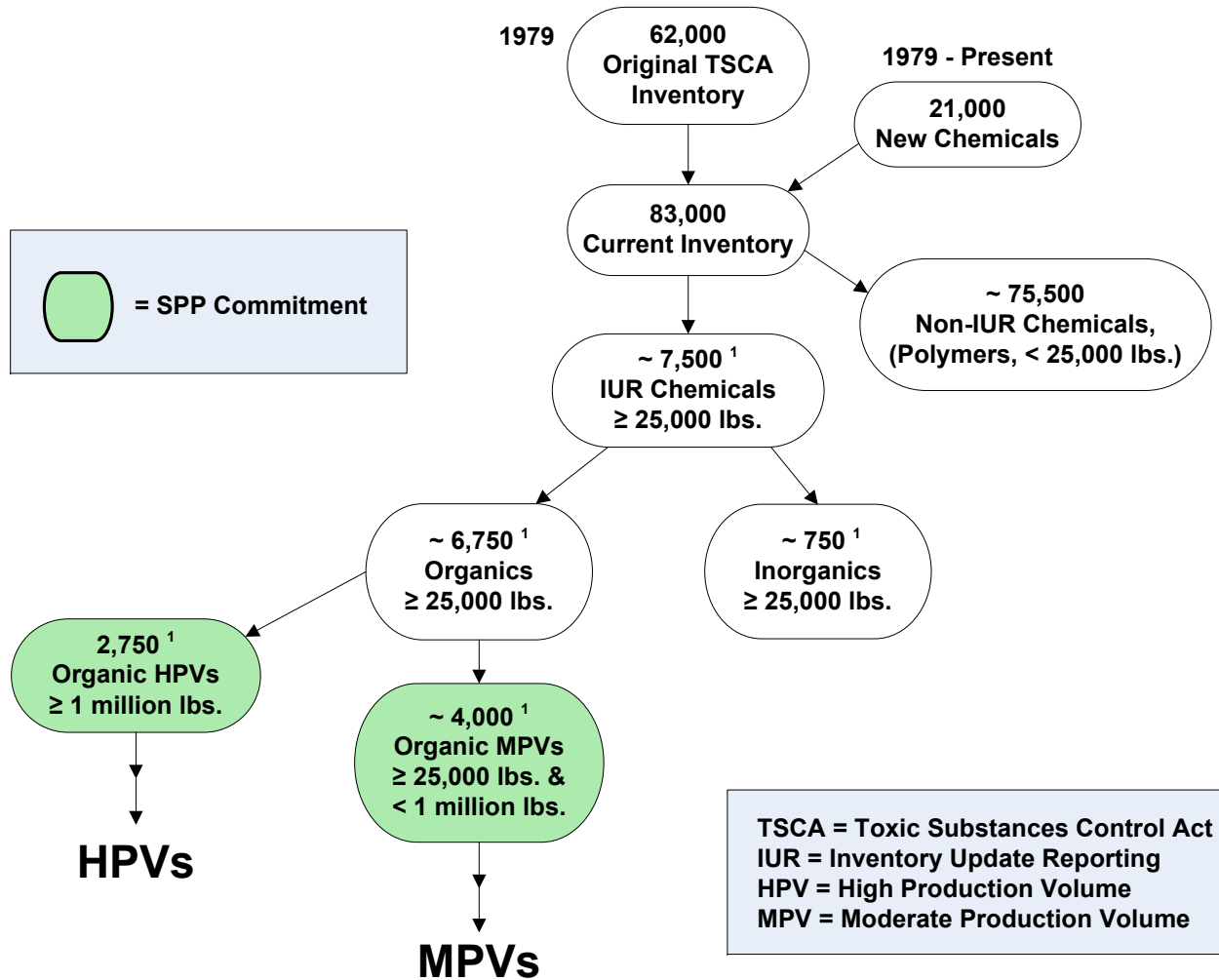


U.S. Commitments Under Security & Prosperity Partnership (SPP)

- By the end of 2012:
 - Assess & initiate needed action on the over 6,750* existing chemicals produced above 25,000 lbs/yr the U.S.
 - Includes High Production Volume (HPV) & Moderate Production Volume (MPV) chemicals
 - Includes work under U.S. HPV Challenge
 - MPV work will build off Canadian categorization effort
 - Make & publicly release screening level decisions & initiate needed action

*Based on preliminary statistics from 2006 IUR Data

U.S. SPP Commitments



¹ Statistics are based upon preliminary 2006 IUR data; the actual numbers may change slightly when official statistics are available.

Note: The 2006 IUR introduces new reporting thresholds.



Chemicals Assessment & Management Program (ChAMP)

New program to include:

- SPP commitments
 - HPV chemicals: \geq 1 million lb (454 tonnes)
 - MPV chemicals: \geq 25,000 lb (11 tonnes) & $<$ 1 million lb
- Possible enhancements to EPA's existing chemical program
 - HPV Challenge type program for high production volume "inorganic" chemicals
 - Resetting the TSCA Inventory



Screening Assessment Process – HPV Chemicals

- Assess & prioritize HPV chemicals based on hazard/ exposure information
- HC = Hazard Characterization
Relies on data submitted under HPV Challenge Program & OECD SIDS:
 - Ecotoxicology
 - Physical-chemical properties
 - Environmental fate
- EC = Exposure Characterization
Relies on data submitted under 2006 TSCA Inventory Update Rule (IUR) & may include:
 - Production & import volumes
 - Manufacturing, industrial processing & use info
 - commercial & consumer uses



Screening-Level Characterizations – HPV Chemicals

- Evaluate Risks
- RC = Risk Characterization
 - HCs & ECs each provide characterizations based on H-M-L
 - Relationship of hazard & exposure levels is evaluated
- Identify & initiate needed action
 - Gather/generate needed information
 - Take control measures
 - Identify as low priority & set aside
- Document & post screening level assessments & conclusions on the web



Risk-Based Prioritizations (RBPs) – Tools for Implementation

- **Where No Further Action Needed At This Time:**
 - Document initial prioritization rationale & post to web

- **Where Additional Info or Action Is Needed, the Options Include:**
 - Contact producers with request for info, informal action
 - Data from other offices, Canada, OECD
 - TSCA §8(a) reporting rules (e.g., exposure, release data)
 - TSCA §5(a)(2) Significant New Use Rules (SNURs)
 - Engage with stakeholders (e.g. DfE, voluntary action, etc.)
 - TSCA §4 test rules
 - Develop/implement Challenge programs, other risk reduction actions
 - Initial creation of TSCA §5(b)(4) list



RBP Development -- Pilot Program

Initial set of RBPs was selected to gain experience with:

- Development of assessment process
 - Screening-level hazard, fate & risk characterizations
 - Risk-based prioritizations
- Differences presented by chemicals
 - Chemical categories vs. individuals
 - Using OECD SIAPs/SIARs for HCs
 - Prioritizing for different hazard levels



Pilot RBP Examples

- **DCAC** = dichloroacetic acid
 - Individual chemical
 - Low concern
 - Mitigating issues
- **HBCD** = hexabromocyclododecane
 - Individual chemical using SIAP instead of HC
 - High concern
 - Other agencies gathering info.
- **Alkyl acetates** = C6-C13 category
 - Category – 6 chemicals, not all HPV
 - 1 medium concern, others low concern



Section §5(b)(4) “Risk List”

Chemicals with risk concerns could be considered for Sec. 5(b)(4) risk list

- TSCA §5(b)(4) authority has never been used.
 - Risk list approach could provide incentive for stewardship
- Requires rulemaking & minimum of a “*may present an unreasonable risk*” finding;
 - May be possible with HPV & IUR data.



Screening Decision Process – MPV Chemicals

- Developing approach to assess MPV Chemicals
 - Apply available data, Canadian categorization results, & EPA Structure Activity Relationships (SAR) analysis to assess hazard & fate.
 - Basic exposure/use data are available only for MPVs produced at $\geq 300,000$ lbs at a site
 - Use hazard characterization to identify MPVs that require follow-up, initiate actions
 - Gather additional data
 - Risk management
- Document & post assessments & conclusions on the web



Meeting the SPP Goals

- 2007
 - Developed process for screening-level Hazard Characterizations (HCs) & Risk Characterizations (RCs), & Risk-Based Prioritizations (RBPs) on HPV chemicals
 - Posted over 150 HCs
- 2008
 - Posted additional 50 HCs in January
 - Posted initial set of RBPs in March
 - Continue developing & posting RBPs
 - Post initial MPV Characterizations
- 2009
 - Continue posting RBPs for HPV chemicals & significantly ramp up posting MPV characterizations



Inorganic HPV Challenge

- **Inorganics first included on IUR in 2006; no exposure data until 2011**
 - EPA estimates ~ 400-500 HPV inorganic chemicals likely to be reported
- **EPA considering IHPV Challenge Program mirroring HPV Challenge design**
 - Identify & work with stakeholders to develop program/process/timing.
 - Apply established EPA, OECD guidance to determine inorganics data needs



Resetting the TSCA Inventory

- TSCA §8(b) requires EPA to “compile, *keep current*, & publish” TSCA Inventory”
- Inventory’s “83,000 chemicals” are misleading
 - Likely that many chemicals are no longer manufactured/imported; or
 - Are produced only in low or episodic volumes



Stakeholder Engagement

- EPA will seek input from a wide range of partners & stakeholders
 - Series of meetings & discussions over next 6-8 weeks
 - Focus meetings, webinars, pre-established conferences/meetings
 - Industry, NGOs, States & Tribes, Federal Partners
- EPA goal is to provide feedback to Administrator this summer & possibly begin implementing approaches by the end of summer.



For Further Information

Visit EPA's ChAMP website:

<http://www.epa.gov/champ/>