Approaches to Identifying Potential Candidate Chemicals for Prioritization: Functional Category Approach Based on Use and Exposure Potential

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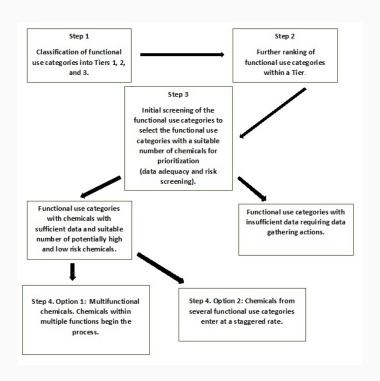


Functional Category Approach Based on Use and Exposure Potential

A functional use category approach could be used to identify groups of candidate chemicals with similar functional uses for prioritization.

- Functional use categories: defined by CDR and OECD.
- Exposure potential: overall understanding of the potential exposure of a particular use category (e.g. consumer, commercial and industrial use; releases, including to water; number of workers; volume of chemical used; etc.)







- Step 1: Classification of functional use categories.
 - based on their exposure potential;
 - made without a specific high-priority chemical in mind;
 - based on information reported under the 2016 CDR, Toxics Release Inventory, or Consumer Product Safety Commission Product Evaluations, and previous experience.
 - Tier 1 functional use categories include consumer (including children) products widely used and with a high likelihood of exposure.
 - Tier 2 functional use categories include other consumer, commercial and industrial uses with a high likelihood of exposure.
 - Tier 3 are the remaining functional use categories.



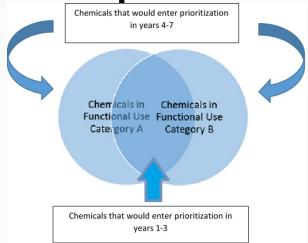
- Step 2. Further ranking of functional use categories. Tiering would be further refined by considering other exposure-related factors.
- Factors could include:
 - number of workers (e.g. > 1,000) using the chemicals;
 - total volume (e.g. > 100,000 lbs/yr) of chemical used;
 - uses that will result in discharge down the drain through residential or commercial use, or in commercial settings;
 - uses with other likely water releases or with potential to contaminate drinking water sources;
 - functional uses involving spray application or emissive uses associated with volatile chemicals in indoor settings where susceptible subpopulation, such as children, could be exposed;
 - other considerations such as continuous use of a chemical or the chemical is actively transported; etc.

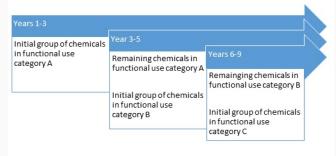


- Step 3. Initial screening of the functional use categories to select the functional use categories with adequate data and a suitable number of chemicals for prioritization.
 - to identify if the chemicals within a given functional use category have sufficient data and if the functional category has a suitable number of chemicals with possible high and low risk.
 - screening using tools such as the High-throughput Screening and Computational Model (Approach 6).
 - functional use categories consisting of chemicals lacking sufficient data would be put in a queue for data gathering actions.



Step 4. Scheduling of prioritization.







Benefits

- Grouping chemicals with similar functional uses can lead to:
 - Efficiencies in chemical assessment where chemicals have similar use and exposure patterns.
 - A smoother substitutes transition for industry given that EPA would be assessing all the chemicals within the same functional use.
 - Identifying low-priority designations to help ensure the availability of alternative chemicals, prevent unfortunate substitution and address uncertainty in the marketplace.
- For downstream risk management: EPA may have more complete information on which to base eventual risk management decisions.

Caveats

- The process outlined focuses on exposure potential related to the functional use category.
- Selection of a chemical based on consumer exposures or a chemical within the Tier 1 functional use category will not preclude the chemical from being evaluated under all conditions of use.



Maximizing stakeholder involvement will be important.

- Ensure a solid understanding of the functional use categories and the use patterns of chemicals within the category.
- Focus opportunities to gather additional information to classify a particular functional use category as Tier 1, 2, or 3.
- Identify additional data/criteria to further group the functional use categories within each Tier; and gather additional information to identify a broad range of chemicals for each functional use category.