



# **DTSC's Safer Consumer Products Program – CEC Monitoring Strategies Draft Report Feedback**

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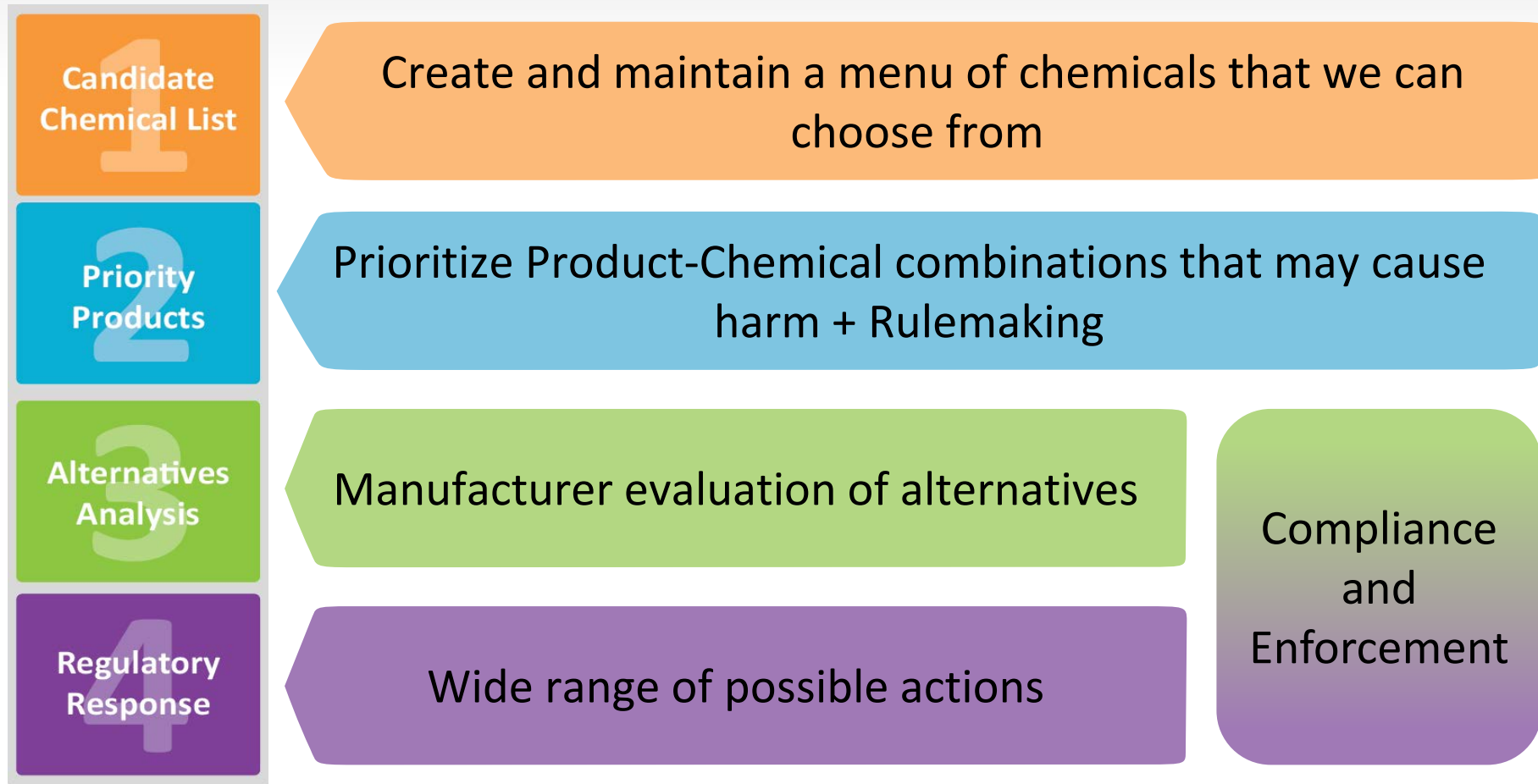


Department of Toxic Substances Control



CalEPA

# SCP Process



# Priority Products

- We can and do regulate chemicals in consumer products that are of concern for California's aquatic environment
- We hope to use the information from this report and future Water Board efforts to inform our own prioritization efforts



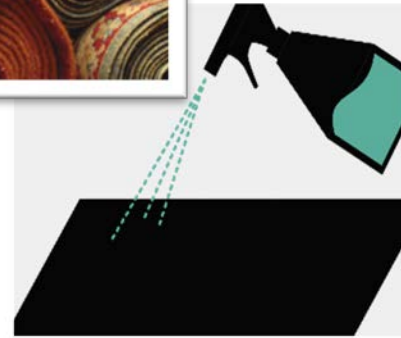
# Adopted Priority Products



Children's foam-padded sleeping products with TDCPP or TCEP flame retardants



Carpets and rugs with PFASs



Textile treatments with PFASs



# Proposed Priority Products



Laundry detergents with nonylphenol ethoxylates (NPEs)



Motor vehicle tires containing 6PPD  
Motor vehicle tires containing zinc



# Overall Feedback

- The compilation of data provides a great resource for California
- Highlighting the need for high-quality data, including the importance of appropriate detection limits, is extremely important
- Encourage more clarification in the report, particularly on the implications of the prioritization categories



# Consider potential for management action

- Prioritize more frequent monitoring of chemicals for which there is potential for management action to mitigate continued release
  - Consider management action beyond just those of the Water Board, including by DTSC and DPR
- Recommend less frequent monitoring of chemicals for which use has largely stopped



# Consider chemical classes

- Exposure to chemicals from a class can result in cumulative adverse impacts to aquatic organisms
  - Additive effects
  - Degrade to more toxic members of the class
- Considering chemicals individually can obscure the true concern
  - Nonylphenol + nonylphenol ethoxylates
  - PFAS + precursors
- Helpful to have these points explicitly made in the report



# Highlight data sources and approaches for new chemical identification

- Trends can help identify chemicals that may need to be prioritized or deprioritized, but can't help with chemicals not on the radar
- Other data sources could help identify chemicals that may be the *next* CECS; highlighting some of these additional data sources and how to evaluate them, for example:
  - Upcoming replacements for current CECs that are being phased out (i.e., newer flame retardants)
  - High production volume chemicals
  - Physicochemical properties



# Questions?

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