May 3, 2013

Alex Stone, Sc,D  
Safer Chemical Alternative Chemist  
Department of Ecology  
Hazardous Waste & Toxics Reduction  
PO Box 47600  
Olympia, WA 98504-7600

Re: Guidance for Alternative Assessment and Risk Reduction

Dear Mr. Stone:

On behalf of the American Forest & Paper Association (AF&PA), we respectfully submit the following comments to the Interstate Chemical Clearinghouse regarding the proposed Guidance for Alternative Assessment and Risk Reduction draft regulations issued in March 2013.

AF&PA serves to advance a sustainable U.S. pulp, paper and packaging manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry’s sustainability initiative - Better Practices, Better Planet 2020. The forest products industry accounts for approximately 4.5 percent of the total U.S. manufacturing GDP, manufactures approximately $200 billion in products annually, and employs nearly 900,000 men and women. The industry meets a payroll of approximately $50 billion annually and is among the top 10 manufacturing sector employers in 47 states.

AF&PA supports the efforts of the Technical Alternative Assessment Guidance Team in putting together the Guidance for Alternatives Assessment and Risk Reduction and working with industry, EPA and others to share best practices. AF&PA believes this guidance document could help businesses avoid the costly and time-consuming process of analyzing alternatives according to a wide variety of different state protocols.

At pages 33 – 34 under “unintentionally added chemicals of concern” the question is stated: “Is the chemical of concern an impurity or the byproduct of a manufacturing process?” If the answer is yes, you are asked “would removing the chemical with the impurity or generating the by-product affect product performance?” If no, the Guidance’s next step is to eliminate the chemical. AF&PA believes eliminating the chemical is not a logical next step. Rather, the next step should be to conduct an alternative assessment, and consider the pertinent issues such as what the potential risks of the chemical of concern in the products are, and what the costs of removal are. A manufacturer may go through an alternative assessment and find that it is not necessary to eliminate the chemical of concern. This same reasoning and step should also apply in considering any alternative processes that are not expected to produce the chemical of concern.
May 3, 2013

We appreciate the opportunity to comment on the proposed Interstate Chemical Clearinghouse guidance. If you have any questions regarding AF&PA’s position on the proposal, please contact Laurie Holmes at (202) 463-5174. Thank you for your consideration.

Sincerely,

Paul Noe
Vice President, Public Policy
American Forest & Paper Association