




User-Site Monitoring Update



5 May 2004
EPA Update
Teleconference



Update

- As noted at 1 April Plenary, we agreed to come back to EPA in 4-6 weeks to report progress and/or status of this user-site monitoring program
 - Each segment will be covered: carpet, paper, and textile
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Carpet – CRI

- Actions
 - Significant effort made by TRP/3M over the past 6 months to develop this program
 - All customers declined to participate
 - Proposed a “community-based” program in absence of direct volunteers
 - Multiple visits made to the Dalton area to discuss user-site monitoring concept with CRI
 - Held discussions with several CRI committees including CEO’s of carpet companies

Carpet – CRI

- Actions
 - “Community-based” monitoring plan proposed
 - Consultant hired (Environ) to scope out a monitoring plan including air, water, soil, biota
 - Plan presented to Telomer TWG on 8 December 2003
 - Local Dalton Municipal Authority formed the ‘cornerstone’ of this plan
 - Monitoring plan contingent on gaining Authority approvals to conduct monitoring on their site
 - Multiple discussions have occurred with CRI and its members as well as by CRI with various Dalton Municipal Authorities

Carpet – CRI

- Status
 - Original “community-based” monitoring plan not viable
- Reasons
 - Key authority controlling community monitoring site has unequivocally declined to participate. Therefore, work on the original ‘cornerstone’ plan has been discontinued.

Carpet – CRI

- CRI Policy Committee has subsequently noted the following:
 - CRI will continue to be engaged with EPA through the TRP
 - In the absence of a completed risk assessment, CRI believes it is premature and technically difficult to design a “scientifically defensible” sampling program
 - No clear NOAEL, so at what level do you measure analytically
 - Difficult to interpret environmental sampling data until risk assessment becomes available -- could create unfounded and unnecessary concerns
- CRI Position Statement (Docket #OPPT-2003-0012-0634)

Carpet – CRI

- Concerns
 - Comments made at 1 April Plenary about our position and our efforts concern us greatly
 - Industry (TRP/3M) efforts have been substantial
 - No easy monitoring solution is readily at hand -- industry has made a significant good faith effort to create a program
 - Industry and CRI have kept EPA abreast of our position, i.e. there were no real surprises on 1 April
 - Industry members are indeed good product stewards -- our actions do support this

Carpet – CRI

- LOI Commitment
 - TRP Mill Pilot: conduct work as proposed March 2003
 - TRP effort has begun using model Telomer acrylate polymeric product
 - Initial experiments conducted and indicate mill pilot approach the correct one for the following reasons:
 - Understand system complexities
 - Controllable; minimize external factors
 - Telomer-based products focused; no extraneous compounds
 - No public permission needed; non-invasive
 - Faster, simpler, time and cost effective
 - Conduct analytical work and develop sampling technology on a simpler system
 - Develop technology to close mass balance; seen significant issues already in simple system!!
 - Probability of Success: high
 - Modeling work, as appropriate, based on data from TRP Mill Pilot study

Carpet – CRI

- Path Forward
 - TRP will conduct its Mill Pilot study, an LOI item, to help address EPA’s data needs and believes this is the best available option
 - Modeling will be conducted, as appropriate, using Mill Pilot outputs
 - No further action on a community-based monitoring program for the carpet sector is contemplated at present
 - Mill Pilot can and will also be used for paper and textile testing

Paper – AF&PA

- Actions
 - Multiple discussions have occurred
 - between AF&PA and its members
 - between TRP / 3M and AF&PA
 - between TRP / 3M, AF&PA and its members
 - including direct meetings and phone conference calls
 - Discussions have been with *top regulatory* personnel from respective paper companies
 - AF&PA has been given contacts names from TRP members and 3M, and one non-TRP member company
 - The AF&PA member companies decided that they will contact the TRP companies and 3M should they need more specific information on this monitoring process

Paper – AF&PA

- Status
 - “Community-based” program not viable for paper due to lack of concentration of companies in a single geography
 - Each individual AF&PA member is considering their own course of action at this time
 - AF&PA has been contacted since last Plenary; offer extended to provide information if needed -- in writing or via a joint company call
- Path Forward
 - Next major check point for a status update with EPA is open
 - Probability of success: low
 - Conduct Mill Pilot studies as in carpet

Textiles – ATMI / NCTO

- Actions
 - Several discussions were held with ATMI representative (P. Adair) by S. Korzeniowski prior to her departure and the organization’s demise
 - Subsequent discussions held with R. DuPree, former ATMI member, now at NCTO, also by S. Korzeniowski
 - Discussions held with direct customers by some member companies
- Status
 - NCTO is not set up to deal with technical issues of this type; not sure when they will be. They are a lobbying organization.
 - No direct customer volunteers at this time
 - “Community-based” program not viable for textiles due to lack of concentration of companies in a single geography
- Path Forward
 - Continue periodic contact with trade organization
 - Explore alternative avenues including further discussions with direct customers
 - Probability of success: low
 - Conduct Mill Pilot studies as in carpet