PFAS in Food Packaging
Alternatives Assessment Update: 4-14-20

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EZView Website:
COVID-19 Update

- PFAS AA team at Ecology and SRC are continuing to work from home.
- Some stakeholders have indicated their ability to engage at this time is limited.
- This webinar will likely be repeated to give all stakeholders an opportunity to engage on this topic.
- We appreciate all of our stakeholders who are supporting our communities during this crisis.
PFAS Food Packaging AA Agenda

- Intro/Welcome
- COVID-19 Update
- Background
- Status Update & Announcements
- Performance Assessment
- Discussion

This webinar is being recorded
Legislature passed toxics law that bans perfluorinated and polyfluorinated substances in paper food packaging.

Ecology will determine whether alternatives are available for specific packaging applications. A peer review process is required.

Ecology reports to legislature and ban will take effect two years later.

Based on the Interstate Chemicals Clearinghouse (IC2) modules: **Hazard (L2); Exposure (L1); Cost & Availability (L1) & Performance (L1).**
The Interstate Chemicals Clearinghouse (IC2) Alternatives Assessment Guide
Product Categories in Scope

- **Category 1**: Paper Wraps, Liners, Bags & Sleeves

- **Category 2**: Dinnerware
  - Plates, bowls, trays

- **Category 3**: Food Service Containers
  - “Take-out” cartons or containers for storage and transport
Proposed Alternative Chemicals for Hazard Evaluation

<table>
<thead>
<tr>
<th>Low Concern</th>
<th>EPA Safer Chemical</th>
<th>Hazard Evaluation Candidates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uncoated paper</td>
<td>Petroleum wax(^1)</td>
<td>Silicone coatings</td>
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<tr>
<td>Aluminum foil</td>
<td>Bio-based wax(^2)</td>
<td>Polyvinyl alcohol coatings</td>
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<tr>
<td></td>
<td>Kaolin clay (CAS 1332-58-7)</td>
<td>Polylactide (foam, plastic, coating) (CAS 9051-89-2)</td>
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<tr>
<td></td>
<td></td>
<td>Polyethylene coatings</td>
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<td></td>
<td></td>
<td>Polyethylene terephthalate coatings</td>
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<tr>
<td></td>
<td></td>
<td>Additives, residuals, contaminants, degradation products</td>
</tr>
</tbody>
</table>

1. Related [EPA SCIL](https://www.epa.gov/chemicals/lefscil) listings may include Paraffin waxes, petroleum, clay-treated (CAS 64742-43-4) and Paraffin waxes, petroleum, hydrotreated (CAS 64742-51-4)
2. Related EPA SCIL listings may include Soybean oil and soybean oil derivatives that could be hydrogenated to produce waxy substances: soybean oil (CAS 8001-22-7), soybean oil fatty acids (CAS 68308-53-2), soybean oil, methyl esters (CAS 67784-80-9), and soybean oil, sulfated, sodium salt (CAS 61790-16-7)
Confidential Business Information (CBI) Guidance Update

- Updated Guidance – new guidance based on discussions with several companies willing to disclose additional information via Confidential Business Information process.
  - CBI Process and Request Template PDF – guidance and template for submitting a CBI request to Ecology.
  - Third Parties – guidance for Ecology sharing of CBI with contractors and peer reviewers (if required).
  - Ecology consultations & technical assistance available.
E-Comment Tool


Share feedback with us

We welcome your input and feedback. If you have information or data to share that could help inform our alternatives assessment process, please submit your comments to us.
Technical Documents

- New documents have been posted to the website and are available for stakeholder comment:
  - **Product and Alternatives Scoping Paper (2/24/2020)**
  - **Hazard Methodology (3/19/2020)**
  - **Exposure Methodology (3/19/2020)**
  - **CBI Guidance & Template (4/10/2020)**
Performance Assessment

- Will be implementing webinar polls to get direct feedback from stakeholders during this call.
- Poll questions will appear on the righthand bar near the chat feature.
- Answers for these polls are anonymous.
- For information gathering purposes to help develop our assessment approach.
- Discussion will continue after the presentation.
Stakeholder Question #1

How would you categorize your organization?
Series of questions based on qualitative data and promotional materials:

- What are the performance needs at the chemical, material, product, and process level?
- Has the alternative already been identified as favorable with respect to performance?
- Has an authoritative body demonstrated that the alternative functions adequately for both the process and product?
- Is the alternative considered favorable but there are indications that it does not perform as well as the current chemical?
- Has the proposed alternative been identified by expert sources as unfavorable?
What are the performance requirements for the product?

- One of the key questions for this assessment.
- Aim to keep requirements as broad, yet inclusive as possible.
  - Identify the “essential requirements”
- The more requirements we include in the assessment, the more complex and time consuming.
- Need to include that if alternatives are being used, this implies the users’ requirements are being met.
CASE STUDY: Performance may be unique, complex, and unexpected

A Flour Based Tortilla Package

A customer had a problem ... each time they cooked a burrito on a clamsheel style grill ... cheese would leak onto the grill ... require time consuming cleaning at the worst time ... when they are busy

THE CUSTOMER WANTED US TO DEVELOP A PACKAGE TO MEET THE FOLLOWING REQUIREMENTS:

• One package – to cook the burrito in, and to service the customer
• Package must keep the grill clean
• The tortilla can’t stick to the package
• The package cannot char, singe or burn
• Package must be low cost
• Package must be printed

Source: http://specialtypackaginginc.com/case_study/a-flour-based-tortilla-package/
Stakeholder Question #2

What are your personal top 3 performance requirements for wraps, liners, bags, dinnerware, and take-out containers?
Is it considered favorable but there are indications that it does not perform as well as the current chemical?

- Some promotional materials and comments from stakeholders have indicated that not all needs may be met, especially for molded fiber alternatives.

- Some stakeholders have shared with us that PFAS products may be over-engineered for certain uses.

- Manufacturers must demonstrate that they’re meeting the essential requirements of their customers needs.
Role of Authoritative Bodies and Expert Sources

- **Question 3: Authoritative bodies?**

- **Question 5: Expert sources?**
  - End users: critical to determining if these products perform
  - Mills, tollers, converters, product manufacturers
  - Technical experts in academia and research & development
Stakeholder Poll #3

Have you tested or successfully substituted an alternative for the products categories under this assessment?
Next Steps

- Continue stakeholder discussions concerning sharing of CBI and performance information.
- Develop performance assessment decision rules.
- Begin conducting hazard assessments.
- Monitor the COVID-19 impacts and adjust strategies as needed.

- Next Call: May 26th 11am PT/2 pm ET
  - Likely to be a repeat of this presentation
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