

5. Work Plan and Proposed Implementation Schedule for Stage 2 of the Alternatives Analysis

The proposed final alternatives assessment work plan and associated schedule is described in Table 7.

TABLE 7

BizNGO Proposed Final Alternatives Analysis Work Plan and Schedule for Complying with California Safer Consumer Products Regulations

Action Item	Description	Completion Date*
Re-evaluation of relevant factors from preliminary alternatives assessment	Relevant factors identified in the Preliminary Alternatives Assessment will be reviewed and changes will be documented.	6 weeks
Review of product function and performance factors	The Performance Evaluation Module (Level 3) of the Interstate Chemicals Clearinghouse Alternatives Assessment Guide (version 1.0) will be followed for performance evaluation guidance. Performance standards identified in Section 1.3 will be used to evaluate key performance parameters and for determining the range of acceptable values for those parameters. The focus of the product function and performance evaluation will be on preventing burden shifting in the form of decreased safety. Given that methylene chloride is a non-flammable solvent, additional fire safety standards will be assessed. Those alternatives demonstrating high concern regarding fire safety will be screened out of the analysis.	10 weeks
Consideration of materials and resource consumption impacts	Existing life cycle inventories or life cycle assessments will be reviewed for relevant data. Where life cycle assessment data are lacking, data for proxy chemicals will be explored as a substitute. Results will be summarized and alternatives that demonstrate significant life cycle burden risk shifting will be screened-out.	14 weeks
Reassessment of hazards for other co-chemicals in the best performing formulations. Conduct literature review to ensure no new hazard information substantively changes the hazard classifications from Stage 1.	In order to minimize hazards in the total formulation, rather than only the chemical of concern, a screening hazard assessment will be performed on all co-chemicals in the formulation above 0.01% concentration (100 parts per million) in the formulation. The 4-5 best performing formulations will be screened for using more “quick screening” methods given the number of chemicals to be examined. These methods employ the use of authoritative lists. A literature review will be performed to ensure that new hazard information is considered that may substantively change the hazard classifications in Stage 1.	17 weeks
Review of economic factors	Cost and Availability Evaluation Module (Level 4) of the Interstate Chemicals Clearinghouse Alternatives Assessment Guide (version 1.0) will be followed to assess economic feasibility. It is anticipated that one or more of the alternatives will be selected for substitution of the chemical of concern; therefore, the economic impacts are expected to be positive from a burden shifting perspective. Economic factors, as specified in the regulations, will be researched and evaluated.	21 weeks
Review of priority product and alternatives/alternative selection decision	The Priority Product and the alternatives will be compared based on the relevant factors and one or more alternatives will be selected as the recommended option. Relevant factors will include factors identified, but not analyzed, in the preliminary alternatives assessment, plus relevant function, performance, and economic factors.	30 weeks
Submittal of final report	The scheduled submission date of final report.	40 weeks**

* Completion date: number of weeks after BizNGO receives Notice of Compliance for Preliminary Alternatives Assessment from DTSC.

** Note that BizNGO plans to submit its work plan 12 weeks before the required DTSC deadline of 52 weeks.