



Evaluation of Wildland Fire Chemicals

STANDARD TEST PROCEDURES

STP 1.1 Review of Disclosure Information

Summary: The manufacturer/submitter of a product is required to provide a completed formulation disclosure form and technical data sheet, found in the Manufacturer Submission Procedures, as well as a material safety data sheet (MSDS) for the product and each ingredient.

The Fire Chemicals Project Leader will review the documentation package. Any questions that may arise from the provided information will be resolved at that time.

A review of environmental regulations as they apply to the formulation and the ingredients of the formulation will be completed at the same time.

Method:

1. The status of each chemical with regard to the regulatory lists shown below will be determined.
 - a. 40 Code of Federal Regulations (CFR) 355 Appendix A. – Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), List of Extremely Hazardous Substances and their Threshold Planning Quantities.
 - b. National Toxicology Program’s Annual Report on Carcinogens.
 - c. International Agency for Research on Cancer (IARC) Monographs for Potential Carcinogens.
 - d. 40 CFR 302.4. – CERCLA, List of Hazardous Substances and Reportable Quantities.
 - e. 40 CFR 261.33. – Resources Conservation and Recovery Act (RCRA), Acutely Hazardous and Toxic Wastes.
 - f. 40 CFR 372. – Superfund Amendment and Reauthorization Act (SARA) Title III, sec 313, Emergency Planning and Community Right to Know (EPCRA), Toxic Release Inventory (TRI).
2. If any of the ingredients trigger concern, a basic chemical profile and/or a risk assessment may be required before further action is taken on the formulation evaluation.

Website Addresses:

U.S Environmental Protection Agency (EPA) Regulatory Lists - <http://www.epa.gov>

United States Department of Health and Human Services, National Toxicology Program: Report on Carcinogens - <http://ntp-server.niehs.nih.gov/>

International Agency for Research on Cancer (IARC), Monographs of Carcinogens - Available at <http://www-cie.iarc.fr/monoeval/grlist.html>

Appendix A: How to screen for chemicals of concern for fire chemical submission

- Get Confidential Disclosure
- We only look at chemical and manufacturer. Not worried about volume at this point.
- Need CAS number
- Get checklist spreadsheet (LF-003)
- Go through book of lists (or online) and bump the chemicals against the lists
- If you find a chemical on the list in the EPA categories, make sure the amounts are small and mention it to the company. Also mention it to Chris Madowski (or equivalent) and tell her what we found. She can quickly look it up and make sure the level is not high enough to worry about.
- If we find a chemical of concern, it pushes us to start the risk assessment sooner. They will let us know if it is hazardous or not.
- For cancer (IARC and NTP) chemicals we use the internet. Download the .pdf or excel and bump CD against these lists. We've never found a chemical on there. If we do, it's automatically not acceptable.
 - o A better option is to pull up the **IARC** website and then click on the "list of classifications, volumes 1-117 embedded spreadsheet"
http://monographs.iarc.fr/ENG/Classification/latest_classif.php
 - This has a search field which is way easier to use than looking through pages of pdf's.
 - o For **NTP Annual Report on Carcinogens**, go to
<https://ntp.niehs.nih.gov/pubhealth/roc/index-1.html#toc1>
 - Near bottom of page, click "download the CASRN index in MS Excel"
 - You can then simply run a search for the CAS #'s
- For entries on the CD with multiple ingredients (1317-60-8 / 1309-37-1, for example) check each one separately. This is an example from P-06. If I see this, first check with Shirley to make sure we have no record of the chemical. She may have already run into this chemical, ran it through the risk assessment, and found it to not be in great enough quantity to worry about. If there is no history, we need to run it through Labat (current contact is Chris Madowski) and get their direction.
- Lastly, make sure we have the SDS having the correct manufacturer. Look at toxicity and reaction sections. Make sure nothing raises a flag.
- The most common problem is SDS does not match the manufacturer. We request one that shows the correct manufacturer.