

DTSC, SAFER CONSUMER PRODUCTS, GREEN CHEMISTRY, PRODUCT STEWARDSHIP

DTSC Intends to List Carpets and Rugs Containing PFAs as a Priority Product

By ROGER PEARSON, March 4, 2018

The Department of Toxic Substances Control has announced that it is planning to list carpets and rugs containing perfluoroalkyl and polyfluoroalkyl substances (PFAs) as a "priority product" pursuant to the Department's Safer Consumer Products (SCP) program. As a preliminary step DTSC has released a "chemical profile" of the product-chemical combination(s) that would make up the priority product, and will hold a **workshop on Wednesday, March 7¹⁾**, to take public comments on the draft profile.

There are currently three product-chemical combinations that have so far been formally proposed as priority products under the SCP. One of those proposals has been finalized—children's foam-padded sleeping products [see **DTSC Designates First Priority Product: Children's Foam-Padded Sleeping Products²⁾**, June 29, 2017]. The other two, spray polyurethane foam systems with unreacted methylene diphenyl diisocyanate [see **DTSC Formally Proposes to Designate Second Priority Product³⁾**, April 4, 2017] and paint and varnish strippers [see **DTSC Proposes to Designate Paint or Varnish Strippers Containing Methylene Chloride as Priority Product⁴⁾**, December 5, 2017], are still under consideration. Once a priority product has been formally identified manufacturers of that product selling in California must identify themselves and then perform an "alternatives analysis" to determine whether there is a safer alternative.

Under the SCP regulations a priority product must meet the following criteria:

- There must be potential public and/or aquatic, avian, or terrestrial animal or plant exposure to the candidate chemicals contained in the product; and
- There must be the potential for one or more of these exposures to contribute to or cause widespread adverse impact.

According to DTSC PFAs are widely used to treat rugs and carpets to make the products stain, soil, or water resistant. The PFAs are released to the environment during product manufacture, use, or disposal. Once released the PFAs are remarkably persistent resulting in the accumulation of the chemicals in indoor dust, drinking water sources, food, wildlife, and humans, including the milk and serum of breastfeeding women.

Exposure to PFAs has been linked to a long list of toxicological and environmental hazards to humans, including increased serum cholesterol, thyroid disease, immune system disruption, pregnancy-induced hypertension, and kidney and testicular cancers. There is an even longer list of hazards to animals from exposure to PFAs.

Product Description

The DTSC chemical profile on PFAs states⁵⁾ that there are over 3,000 chemical compounds that might fall into the "priority product" once it is formally defined. These include perfluoroalkyl acids, PFAA precursors, and perfluoropolyethers. The profile contains a list of the most common of these compounds. The Department notes that PFA manufactures entered into a voluntary agreement with U.S. EPA in 2015 to phase out the production of longer-chain PFAs. However, the Department notes that the substitutes used in-lieu of these longer-chain PFAs are themselves usually PFAs, and that these shorter-chain PFAs, while somewhat safer, are equally persistence in the environment with similar potential for harm.

Next Steps

DTSC emphasizes that this chemical profile is not a formal proposal to list the PFA-carpet/rug combination as a priority product. At this stage the Department is asking the public to provide comments on the substance of the profile with the idea of assisting the agency in its formal identification proposal—assuming that indeed DTSC proceeds with this possible priority product identification. Comments are due by Friday, March 23. On Wednesday, March 7, DTSC will hold a workshop at Cal/EPA headquarters in Sacramento, beginning at 10 a.m. Those who cannot attend in person may view a webcast of the workshop provided that they register with the Department prior to March 7.

Resources for this article

1. workshop on Wednesday, March 7

<http://www.dtsc.ca.gov/SCP/Workshops.cfm>

2. DTSC Designates First Priority Product: Children's Foam-Padded Sleeping Products

<https://ceitoday.com/articles/13110>

3. DTSC Formally Proposes to Designate Second Priority Product

<https://ceitoday.com/articles/12789>

4. DTSC Proposes to Designate Paint or Varnish Strippers Containing Methylene Chloride as Priority Product

<https://ceitoday.com/articles/13264>

5. The DTSC chemical profile on PFAs states

<https://ceitoday.com/documents/25867>