



December 16, 2024

Kim Morley
Safer Products for Washington Project Manager
Washington Department of Ecology, HWTR Program
P.O. Box 47600
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Submitted electronically to SaferProductsWA@ecy.wa.gov

Re: Draft Technical Supporting Documentation for Priority Products: Safer Products for Washington Cycle 2 Implementation Phase 2

Dear Ms. Morley:

The Adhesive and Sealant Council (ASC or Council) appreciates the opportunity to comment on the Washington State Department of Ecology *Draft Technical Supporting Documentation for Priority Products Cycle 2 Phase 2* (Draft Support Document).¹

ASC is a trade association representing the North American adhesive and sealant value chain. The Council is comprised of 117 adhesive and sealant manufacturers, raw material and equipment suppliers and distributors, and industry consultants, representing more than 75 percent of the U.S. industry. Offering education, legislative advocacy, professional networking, and business growth solutions to its members, the ASC is the center of knowledge and a catalyst for industry growth on a global basis for manufacturers, suppliers, and end-users.

The Department of Ecology is proposing to identify a priority product class that includes sealants, caulks, and adhesives that contain ortho-phthalates used in architectural or home maintenance applications. This category does not include hard surface sealants used to seal porous surfaces, and it does not include adhesives that are not intended for use in architectural or home maintenance applications.

Members of ASC have evaluated table 17 in the Draft Support Document and noted that for ortho-phthalates that are used, the concentration ranges are generally similar. We note that table 17 of the Draft Support Document lists multiple uses of DPHP and DIDP. However, these specific organo-phthalates are not mentioned in the discussion regarding potential exposures (see pages 115-118 of the Draft Support Document). We recommend against grouping all ortho-

¹ Draft Technical Supporting Documentation for Priority Products: Safer Products for Washington Cycle 2 Implementation Phase 2, November 2024, available at: <https://apps.ecology.wa.gov/publications/SummaryPages/2404050.html>.

phthalates together as they have varying levels of toxicity. As an alternative, the Department of Ecology should consider excluding long-chain phthalates, like DPHP and DIDP, from the broad group. Our members also noted that for some uses, drop-in alternatives to DPHP do not exist and reformulating would be necessary to replace DPHP.

The Council appreciates your consideration of these comments. If you have any questions or would like additional information, please contact me at bill.allmond@ascouncil.org or (301) 986-9715.

Sincerely,



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