

DRAFT

COMMITMENTS MADE BY INDUSTRY AT JUNE 11 HEARING

1. Develop a consensus strategy for science yes

We are utilizing a three-part process to obtain consensus strategy:

1. Development of research protocol by CRI's Testing/Toxicological Committee
2. Review and critique by CRI's Scientific Advisory Board
3. Peer review. *what does this mean? EPA? who are the peers?*

Procedures 1 and 2 have been completed for "Respiratory Irritation From Carpet Emissions" and "Inhalation Neurotoxicity Study of Carpet Emissions in Mice and Rats." Step 3 is in the process of being implemented.

Dudak - Stadler
2 week sub-chronic rats & mice. Overall to present assessment, may include some

2. Develop a consensus strategy for consumer education yes

CRI has commenced implementation of a consumer information brochure. Effective January 1, 1994, in excess of 40,000 retailers have received a packet containing in-store display of the agreed upon label, Owner's Manual, and testing program brochure. All industry segments have coalesced and are in support.

agree that in 60 days

Effective January 1, 1994, carpet samples from participating companies will have affixed the Consumer Information Label. Participation includes 70 manufacturers representing 75% of the volume. It is anticipated that, except for older samples in inventory, the marketplace

will be covered by the end of summer. CRI and the industry have spent an estimated \$2 million on this effort. A cadre of 4,200 mill reps will assume follow up service on a continuing basis to assure distribution.

3. Develop an additional consumer product information label *yes*

Consumer product information and label was agreed to by the Attorneys General from New York, Connecticut, Vermont, and Oregon; EPA; CPSC; consumer groups; and several members of Congress. *ok*

4. Provide chemical characteristics of carpet emissions *yes*

Overall goal is to identify and quantify chemical content of carpet and identify and quantify the chemical emissions coming from carpet. The chemical content is not a problem unless it is ingested. Then a risk assessment will be made of the chemicals and quantity being emitted from carpet. (7)

An additional risk analysis will be made by RTI on carpet emissions not covered in the initial report.

5. Provide list of the chemicals

Work in progress by Southwest Research will include a list of chemicals at detectable levels, accompanied by a risk analysis putting into perspective potential exposure levels if they could become volatilized or if they maintain a latent, to be accompanied by an explanation that it is only the volatilized emission to which exposure can be attributed. (7)

6. Review feasibility of developing industry manufacturing quality control standards

One meeting has already been held of an internal group. Initial reports indicate that mills are already, on an individual basis, implementing the following:

Raw materials specifications to minimize emission levels and techniques of establishing the desired temperature range and carpet moisture limits of carpet coming from the finishing ranges. *Show should publish their specs.*

Due to product differences, a great deal more work lies ahead to determine the feasibility of establishing uniform across-the-board industry standards. This work is continuing.

7. Evaluate effectiveness of workers' safety

An initial survey has already been conducted and a final report is in the process of being prepared. Preliminary analysis of this report indicates that no health related problems associated with possible chemical exposure.

A prospective data collection process will be implemented to obtain corporate health and safety information from mills in order to determine possible trends which will require attention and/or further study.

8. Review case studies of alleged problem situations

A form to collect data regarding case studies and/or

This work was not done by scientists, professionals and it is not defensible in the scientific or legal community.

needs info of professionals. Use people

telephone inquiries is in the process of being finalized for reporting purposes to EPA.

Six response teams have been identified to investigate carpet complaint situations on a national basis. EPA has requested participation by an EPA representative and a medical doctor. An EPA representative will be included; practicality of participation by an MD is now under consideration.

These teams will investigate actual field conditions at alleged complaint sites. Work is under way to determine a criteria under which the response teams would spring into action.

9. Develop enhancements to the testing and labeling program

The IAQ testing program will implement an emissions reduction criteria and will quadruple the frequency of testing of product types.

1/28/94