

International Harmonization Efforts on Petroleum Substances

Characterizing Chemicals in Commerce:
Using Data on High Production Volume (HPV)
Chemicals
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Outline Of Talk

- Petroleum HPV Testing Group & Goals
- Harmonization of HPV Petroleum Categories
- GHS Classification and Labeling Of Petroleum Substances
 - IPIECA Proposal
 - CONCAWE Program
- Data Sharing For REACH
- Study Types And Data Sharing Limitations



Petroleum HPV Testing Group

- 60 Member Companies
 - American Petroleum Institute (Program Administrator)
 - Asphalt Institute
 - Gas Processors Association
 - National Petrochemical & Refiners Association
- Sponsor for 405 HPV Chemicals



Petroleum Industry Goals for Meeting the HPV Challenge

- Provide screening level hazard information as requested by USEPA – existing & new
- Generate Health, Environment, and Safety data (existing and new) in the US program for use in global voluntary and regulatory programs
- An example LPG:
 - US HPV requirement = 28-day repeat-dose study
 - EU requirement = 90-day for RA
 - US program conduct 90-day study
 - Conserve technical, animal & financial resources



Strategy to Meet Goals

- Collaborate with domestic and global petroleum companies
- Coordinate EHS research efforts through petroleum industry trade associations
 - API US
 - CONCAWE Europe
 - IPIECA global
- Form new collaborations with ICCA HPV program via ACC Petroleum-related Chemstar Panels



Petroleum Categories

- The Petroleum HPV Testing Group is using <u>product-focused</u> categories in the US program
- Categories for petroleum substances were used before the US HPV Chemical Challenge Program
 - European Union (EU) classification and labeling guidance under the Dangerous Substances Directive (DSD)
- Harmonized with EU by collapsing 37 EU categories into approximately a dozen categories



US Petroleum HPV Product- Focused Categories

- Petroleum Gases (LPG)
- Gasoline
- Kerosene/Jet Fuel
- Gas Oils (Diesel #2 and Heating Fuel #2)
- Heavy Fuel Oils
- Lubricating Oils
- Aromatic Extracts
- Petroleum Waxes
- Asphalt
- Petroleum Coke
- Crude Oil



HPV Categories/EU Categories

HPV EU DSD

Gas Oils (#2 diesel fuels/heating oils)	Straight Run Gas Oil Components
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	Cracked Gas Oil Components
	Hydrocracked Gas Oil
	Components
	Vacuum Gas Oil Components
	Other Gas Oil Components
	Distillate Fuel Oils



Classification And Labeling Of Petroleum Substances

- Globally Harmonized System
 - United Nations guidance
 - Implemented by each country
- Petroleum industry efforts to globally harmonize classification include:
 - IPIECA for UN GHS worldwide
 - CONCAWE for EU GHS



EU REACH Requirements

REACH Requires Data Sharing

- Mandates that manufacturer consortiums be formed
- Requires "Letter Of Access" to use data sponsored by others
- Having a copy of the study or a robust summary doesn't mean you can use it to register under REACH
- A REACH Implementation Project (RIP 3) is still working on guidance to industry on data sharing



Study Types And Sharing Limitations

Different Sources Of Data Change The Access To It:

- Petroleum HPV Testing Group sponsored studies (new data) will be made available for use in REACH
- API sponsored studies (existing data) will be made available for use in REACH
- Company studies submitted to the consortium to use in the HPV program (existing data) are still the property of the sponsoring company
 - Robust Summaries will be available
 - API will have copies of all studies if EPA wants to review



Summary and Conclusions

- The petroleum industry is a global industry, so sharing HES data is an ongoing established practice
- Ongoing harmonization efforts include:
 - HPV programs
 - GHS
 - REACH
- The industry is committed to working with global regulatory agencies to satisfy their HES needs and requirements.



For more information

- http://www.epa.gov/HPV/
- Tom Gray: grayt@api.org



Acronyms

- ACC American Chemistry Council
- ICCA International Council of Chemical Associations
- CONCAWE <u>Conservation of Clean Air and Water</u> in <u>Europe</u>
- IPIECA International Petroleum Industry
 <u>Environmental Conservation Association</u>
- REACH Registration, Evaluation, and Authorization
 Of Chemicals