Safer Products for Washington

Many consumer products that we use in our daily lives contain toxic chemicals. As these products are used or disposed of, they become a diffuse source of toxic chemicals that can impact sensitive populations of people and wildlife. Under the Safer Products for Washington Act of 2019, Washington State Department of Ecology has the authority to restrict the use classes of chemicals in consumer products when safer alternatives are available. This course will give students a chance to learn more about this program, practice identifying and using tools to find safer alternatives and have a dialog about the methods Ecology is using and draft findings.

**Class goals include:**
- Learning about hazard and risk-based alternatives assessment methods for decision making
- Understanding the Safer Products for Washington Law (RCW 70A.350)
- Accessing tools and resources for identifying chemicals in products potential sources of exposure
- Accessing tools and resources for identifying safer chemicals and products
- Reviewing and discussing Ecology’s draft findings for safer, feasible and available alternatives
- Thinking critically about equity, diversity and inclusion – How do toxic chemicals in consumer products impact sensitive populations differently? How can we work to decrease disproportionate exposures to toxic chemicals?
- Learning about participating in the public comment process for government agencies

Photos Modified from https://www.cloudimoyo.com/decision_analytics/

Autumn Quarter 2021
Monday’s 2:30pm – 4:20 pm
2 credits, Graded
Open to all graduate students

**Instructor:** Elaine M. Faustman, faustman@uw.edu
**Guest:** Marissa Smith, Marissa.smith@ecy.wa.gov

ENV H 593 A: Current Topics in Risk Assessment

Safer Products for Washington

Autumn Quarter 2021
Dr. Elaine M. Faustman (pronouns: she/her/hers), Professor and Director of the Institute of Risk Analysis and Risk Communication, School of Public Health, University of Washington, Seattle. Dr. Faustman directs the Center for Children’s Health Research and directed the Pacific Northwest Center for the National Children’s Study and the Oceans and Human Health Center. She is an elected fellow of the American Association for the Advancement of Science and the Society for Risk Analysis. She has served on the USEPA Science Advisory Board and chaired the National Academy of Sciences Committee on Developmental Toxicology. She has also served on the National Advisory Environmental Health Sciences Council, NIEHS-NTP Board of Scientific Counselors and Committee on Alternative Toxicology Methods, National Academy of Sciences Committee on Toxicology and the Institute of Medicine Upper Reference Levels of Nutrient Subcommittee of the Food and Nutrition Board. She has served as the Secretary General for the International Union of Toxicology (IUTOX) and is currently a member of the International Science Council (ISC) World Data Systems Advisory Board. For over 2 decades she has been involved and directed Stakeholder forums and Community Based Participatory Research for DOE, EPA and NIH. She currently serves on the ISC CODATA Citizen Sciences Task group. Her research expertise is on integrative scientific approaches including identifying molecular mechanisms of developmental, reproductive, and neuro toxicants, characterizing in vitro techniques for toxicity assessment, and developing biological and exposure based dose-response models. She has over 200 peer reviewed research publications and reports.

Guest: Marissa Smith is a native Washingtonian. She earned her M.S. and Ph.D. in Environmental Toxicology from University of Washington in 2012 and 2019, respectively. While at the University of Washington, her research focused on the interface between oceans and human health, the impact and variability in children’s exposures to environmental chemicals, developing decision tools for predictive toxicology models. She is currently a senior regulatory toxicologist at the Washington State Department of Ecology and the technical lead for the implementation of the Safer Products for Washington Program.

Course Times and Locations:

Day/Time: Monday’s from 2:30 pm - 4:20 pm

Location: South Campus Center (SOCC) 222 and Zoom

Course Description:

Many consumer products and packages that we use in our daily lives contain toxic chemicals. Once hazardous chemicals are in consumer products, reducing exposure is challenging. It’s hard to predict how people will use consumer products and what they’ll do with them when they're done. In 2019, the Washington State Legislature passed the Pollution Prevention for Healthy People and Puget Sound Act (RCW 70A.350). The Department of Ecology developed the [Safer Products for Washington Program](https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Safer-products) to implement this law. Instead of conducting single chemical-product risk assessments, Safer Products for Washington focuses on reducing the use of classes of hazardous
chemicals by moving to safer alternatives. This gives us the opportunity to reduce the impacts of hazardous chemicals across the product lifecycle—from manufacturing to disposal or reuse—and focus our efforts on pollution prevention instead of costly clean-ups. The law requires Ecology to identify priority chemicals and priority products and then make regulatory determinations based on whether safer alternatives are feasible and available, among other criteria. The first set of priority product-chemical combinations include per and polyfluoroalkyl substances in carpets and rugs, aftermarket stain treatments and furnishings, polychlorinated biphenyls in paints and printing inks, phenolic compounds in laundry detergents, can linings and thermal paper, flame retardants in recreational foam products and electric and electronic enclosures and phthalates in vinyl flooring products and personal care and beauty products. This course will discuss Ecology’s criteria for identifying safer, feasible and available alternatives and preliminary findings of alternatives to our first set of priority product chemical combinations.

**Autumn 2021 Learning Objectives:**

1. Learning about hazard and risk-based alternatives assessment methods for decision making.
3. Accessing tools and resources for identifying chemicals in products potential sources of exposure.
4. Accessing tools and resources for identifying safer chemicals and products.
5.Reviewing and discussing Ecology’s draft findings for safer, feasible and available alternatives.
6. Thinking critically about equity, diversity and inclusion – How do toxic chemicals in consumer products impact sensitive populations differently? How can we work to decrease disproportionate exposures to toxic chemicals?
7. Learning about participating in the public comment process for government agencies.

**Additional Learning Objectives:**

1. Think critically about risk assessment by completing reading assignments and participating in class discussions.
2. Communicate the concept of integrated risk assessment and risk communication.
3. Explain the risk assessment framework as it relates specifically to the current quarter topic.
4. Analyze assigned readings and interpret their relevance to not only the quarter topic but also their applicability and generalizability to risk assessment topics at large.
5. Summarize key points from assigned journal articles or other required readings.
6. Prepare and deliver an oral presentation(s) discussing the required reading.
7. Critique risk assessment applications as they relate to the current quarter topic.
8. Identify risk assessment strengths and challenges, as well as the role of uncertainty.
9. Develop skills to think critically about the methods and tools used for assessment, management, and communication of risk.

**Course Requirements**

Reminder this class is a journal club so please come to each session prepared to share your articles or sections with your colleagues. Please use the “Article Report Form Template” to structure your review. Please feel free to share a few slides that share these highlights in a manner you wish to share. We will always be able to pull up the original article but sometimes your tailored slides facilitate the discussion.

You will be requested to review two articles for each class and to complete 5 of the article report forms. If you will be missing class, please send your review by email.

You will also, by the end of the class, be requested to complete one “Research Relevancy Report Form Template”. Note that this report can cover more than one article and be more of a summary of lessons learned from the sessions. Total page limits for this assignment is 3 pages double spaced. We will discuss further in class the purpose and intent of this report.

**Grading:**

- **50% Weekly Discussion Participation and Related Assignments:** Weekly summations and presentation of key points from readings and respectful engagement in substantive in-class discussions.
- **25% FIVE Article Reports** - See the template at the end of the syllabus and limit your responses to 2 pages double spaced. Reports will be graded for completeness and thoughtfulness. Reports should be submitted on Canvas each week before class starts. Please post the article you selected on the Canvas Discussions Page. You will need to submit five Article Reports throughout the quarter.
• **25% In-Class Presentation and report** - Presentation or demonstration of the applications to your own research or interest area. Please use the Research Relevancy Report Template at the end of this syllabus and limit your response to 3 pages double spaced. You will be required to submit ONE research relevancy report on Canvas for the quarter. In addition to the report, please prepare a brief presentation (about 10 minutes) with 2-3 figures/tables to support your observations.

**Land Acknowledgment:**

Washington State is home (https://www.washingtontribes.org/tribes-map) to 29 federally recognized and five unrecognized tribes. We hope to demonstrate our collective humility and respect for the original caretakers of the land that the School of Public Health sits on. We encourage students to find out who the original settlers of the land they are on to encourage deeper understanding and solidarity with indigenous people.

The University of Washington acknowledges the Coast Salish people of this land, the land which touches the shared waters of all tribes and bands within the Duwamish, Suquamish, Tulalip, and Muckleshoot nations.

**Academic Integrity:**

Students at the University of Washington (UW) are expected to maintain the highest standards of academic conduct, professional honesty, and personal integrity. The UW School of Public Health (SPH) is committed to upholding standards of academic integrity consistent with the academic and professional communities of which it is a part. Plagiarism, cheating, and other misconduct are serious violations of the University of Washington Student Conduct Code (WAC 478-120). We expect you to know and follow the university's policies on cheating and plagiarism, and the [SPH Academic Integrity Policy](https://sph.washington.edu/students/academic-integrity-policy). Any suspected cases of academic misconduct will be handled according to University of Washington regulations. For more information, see the University of Washington Community Standards and Student Conduct website.

**Statement on Inclusion and Diversity:**

Diverse backgrounds, embodiments and experiences are essential to the critical thinking endeavor at the heart of University education. In SPH, we are expected:

1. To respect individual differences, which may include, but are not limited to, age, cultural background, disability, ethnicity, family status, gender identity and expression, citizenship and immigration status, national origin, race, religion, sex, sexual orientation, socioeconomic status and veteran status.
2. To engage respectfully in the discussion of diverse worldviews and ideologies embedded in course readings, presentations, and artifacts, including those course materials that are at odds with personal beliefs and values.

On our first day of class we will create ground rules together to follow in promoting a productive learning environment for all members of the class. I am committed to making this class an equitable learning environment. Please talk with me right away if you experience disrespect in this class from other students and/or from me, and I will work to address it in an educational manner.

**UW School of Public Health Equity Diversity and Inclusion Statement:**

Our School of Public Health is committed to addressing the root causes of health inequities and promoting healthy and safe communities in our region and beyond. As the problem of racial and ethnic disparities in health outcomes continues to persist, policymakers and the general public increasingly look to health professional schools to address these urgent and unacceptable circumstances. As one of the few schools of public health in the Northwest, it is particularly important for us to be up to this challenge.

Underlying all public health research and training activities is an acknowledgement and deeper understanding of the effects that historical, cultural, and socioeconomic factors have on the health of communities, especially those who are most underserved. Racism and race-based oppression is all too often a central driver of health disparities. We work to attract and retain students, faculty and staff from diverse backgrounds and perspectives, to build and sustain a positive climate for inclusion and community, and to engender multiple modes of approaching complex problems. We strive to create opportunities for education, research and collaboration that leverage our strengths, similarities, and differences. We challenge ourselves to view problems and evaluate solutions through an equity lens. Through each of these efforts, we aim to foster a generation of public health professionals and academicians who are poised to transform health for the better in our communities.
Our historical logo, the Soul Catcher by Marvin Oliver, symbolizes the restoration of health and wellness and reminds us to align our work with the history, traditions, and practices while respecting and supporting the agency of individuals and communities to achieve their desired health outcomes. More information about our logo can be found here.

The work of equity, diversity and inclusion is the work of Public Health. We are committed to a future that is free of health inequities, that promotes the highest level of wellness that our communities aim for, and a diverse and inclusive public health workforce that embodies humility, respect, leadership and service on behalf of the diverse communities we are privileged to serve.

**Statement on Classroom Climate**

We are co-creators of our learning environment. It is our collective responsibility to develop a supportive learning environment for everyone. Listening with respect and an open mind, striving to understand others’ views, and articulating your own point of view will help foster the creation of this environment. We engage our differences with the intent to build community, not to put down the other and distance our self from the other. Being mindful to not monopolize discussion and/or interrupt others will also help foster a dialogic environment.

The following guidelines can add to the richness of our discussion:

- We assume that persons are always doing the best that they can, including the persons in this learning environment.
- We acknowledge that systematic oppression exists based on privileged positions and specific to race, gender, class, religion, sexual orientation, and other social variables and identities.
- We posit that assigning blame to persons in socially marginal positions is counter-productive to our practice. We can learn much about the dominant culture by looking at how it constructs the lives of those on its social margins.
- While we may question or take issue with another class member’s ideology, we will not demean, devalue, or attempt to humiliate another person based on her/his experiences, value system, or construction of meaning.
- We have a professional obligation to actively challenge myths and stereotypes about our own groups and other groups so we can break down the walls that prohibit group cooperation and growth.

[Adapted from Lynn Weber Cannon (1990). Fostering positive race, class, and gender dynamics in the classroom. Women Studies Quarterly, 1 & 2, 126-134.]

We are a learning community. As such, we are expected to engage with difference. Part of functioning as a learning community is to engage in dialogue in respectful ways that supports learning for all of us and that holds us accountable to each other. Our learning community asks us to trust and take risks in being vulnerable.

Here are some guidelines that we try to use in our learning process:

- LISTEN WELL and be present to each member of our group and class.
- Assume that I might miss things others see and see things others miss.
- Raise my views in such a way that I encourage others to raise theirs.
- Inquire into others’ views while inviting them to inquire into mine.
- Extend the same listening to others I would wish them to extend to me.
- Surface my feelings in such a way that I make it easier for others to surface theirs.
- Regard my views as a perspective onto the world, not the world itself.
- Beware of either-or thinking.
- Beware of my assumptions of others and their motivations.
- Test my assumptions about how and why people say or do things.
- Be authentic in my engagement with all members of our class.

**Reporting Learning Environment Concerns:**

The Office of the Dean has a student concern policy, a faculty concern policy and standard HR procedures for staff concerns. Students are encouraged to report any incidents of bias in any of the following ways:
• Report the incident to someone they feel comfortable with (including teaching staff, adviser or department staff) or directly inform the SPH Assistant Dean for Equity, Diversity & Inclusion Dr. Victoria Gardner at vg@uw.edu.

• Email dcinfo@uw.edu (mailto:dcinfo@uw.edu) to file a non-anonymous, confidential report (tracked by Director of Student and Academic Services and Assistant Dean of Equity, Diversity & Inclusion) or

• Send an anonymous and confidential report using the bias concern form here (https://catalyst.uw.edu/webq/survey/vg/375764). Report is received by the Assistant Dean for EDI and the Director of Program Operations for Student and Academic Services and tracked for investigation and/or resolution. Reporter can remain completely anonymous but will not receive a response.

Access and Accommodations:

Your experience in this class is important to me. If you have already established accommodations with Disability Resources for Students (DRS), please communicate your approved accommodations to me at your earliest convenience so we can discuss your needs in this course.

If you have not yet established services through DRS, but have a temporary health condition or permanent disability that requires accommodations (conditions include but are not limited to mental health, attention-related, learning, vision, hearing, physical or health impacts), you are welcome to contact DRS at 206-543-8924 or uwdrs@uw.edu (mailto:uwdrs@uw.edu) or disability.uw.edu (http://depts.washington.edu/uwdrs/) DRS offers resources and coordinates reasonable accommodations for students with disabilities and/or temporary health conditions. Reasonable accommodations are established through an interactive process between you, your instructor(s) and DRS. It is the policy and practice of the University of Washington to create inclusive and accessible learning environments consistent with federal and state law.

Religious accommodations:

Washington state law requires that UW develop a policy for accommodation of student absences or significant hardship due to reasons of faith or conscience, or for organized religious activities. The UW’s policy, including more information about how to request an accommodation, is available at Religious Accommodations Policy (https://registrar.washington.edu/staffandfaculty/religious-accommodations-policy/). Accommodations must be requested within the first two weeks of this course using the Religious Accommodations Request form (https://registrar.washington.edu/students/religious-accommodations-request/).

Pronouns:

According to the UW First Year Programs, being an ally is not just about intention, it is also about behavior. We share our pronouns because we strive to cultivate an inclusive environment where people of all genders feel safe and respected. We cannot assume we know someone’s gender just by looking at them. So we invite everyone to share their pronouns.

COVID-Related Expectations

Per UW policy, this class will be conducted in person. We will be providing both synchronous as well as asynchronous access to the course however; a large portion of this course is real time dialogue and discussion with our DOE colleagues. Please notify the instructor when you anticipate missing the synchronous dialogue available via Zoom and in class participation. We will arrange jointly with the course participants how to fulfill the course requirements if synchronous access cannot be achieved.

Please contact UW Disability Resources for Students (DRS) directly if you feel you may be eligible for an accommodation based on your status as an immunocompromised individual or based on other diagnosed physical or mental health conditions that might prevent you from being able to take classes in-person.

If you are a student enrolled in a program in SPH, and you are either living with an individual who is immunocompromised, OR you are unable to obtain a visa to travel to the US, you may be eligible for a “special arrangement” that will allow you to take this course remotely. Requests for special arrangements to take the class remotely should have been submitted to and approved by the Students and Academic Services team in the Office of the Dean before the beginning of the quarter. If you have questions about this type of arrangement, please reach out to Student and Academic Services by email at sphsas@uw.edu.
All UW students are expected to complete their vaccine attestation before arriving on campus and to follow the campus-wide face-covering policy at all times. You are expected to follow state, local, and UW COVID-19 policies and recommendations. If you feel ill or exhibit possible COVID symptoms, you should not come to class. If you need to temporarily quarantine or isolate per CDC guidance and/or campus policy, you are responsible for notifying your instructors as soon as possible by email. If you receive a positive COVID-19 test result, you must report to campus Environmental Health & Safety (EH&S) by emailing covidehc@uw.edu or calling 206-626-3344.

Food is not allowed in the classroom. Drinks may be sipped with lifting or removal of your facemask for a brief moment, and immediate re-masking after drinking.

Please check your email daily BEFORE coming to class. If we need to conduct class remotely because the instructor or a guest speaker is complying with UW policies and unable to attend in person, we will send all registered students an email with a Zoom link for remote instruction. Thank you for your patience and support as we all transition together back to in-person learning!

To help facilitate covid safety, we ask students to please return to the same seat each class period unless instructed to change by an instructor. This will aid in learning each other's names as well as safety for close-contacts in the classroom.

Course Schedule:
### Course Schedule:

<table>
<thead>
<tr>
<th>Session #</th>
<th>Date</th>
<th>Topic</th>
<th>Readings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Session 1</td>
<td>10/04/21</td>
<td>Orientation to the course Introduction to the Department of Ecology Collaboration Introduction to Green Chemistry and Alternatives Assessment</td>
<td>No Required Readings prior to first session.</td>
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<tr>
<td>Session 2</td>
<td>10/11/20</td>
<td>Review of Alternatives Assessment and Green Chemistry Documents Tools to Identify and Prioritize Products I</td>
<td>Student to post chosen article on discussion board from Bibliography Section: Alternatives Assessment and Green Chemistry</td>
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<tr>
<td>Session 3</td>
<td>10/18/20</td>
<td>Background on Safer Products for WA</td>
<td>Student to post chosen article on discussion board.</td>
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<tr>
<td>Session 4</td>
<td>10/25/20</td>
<td>Tools to Identify and Prioritize Products II</td>
<td>Student to post chosen article on discussion board.</td>
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<td>Session 5</td>
<td>11/01/20</td>
<td>Methods for Identifying Safer Products Introduction of DOE Case Studies</td>
<td>Student to post chosen article on discussion board.</td>
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<td>Session 6</td>
<td>11/08/20</td>
<td>Analysis of Case Studies I</td>
<td>Student to post chosen article on discussion board.</td>
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<tr>
<td>Session 7</td>
<td>11/15/20</td>
<td>Analysis of Case Studies II</td>
<td>Student to post chosen article on discussion board.</td>
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<td>Session 8</td>
<td>11/22/20</td>
<td>In Depth Analysis of PFAS case study</td>
<td>Student to post chosen article on discussion board.</td>
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<td>Session 9</td>
<td>11/29/20</td>
<td>Review of DOE public comment process Review of Student Draft Comments</td>
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<td>Session 10</td>
<td>12/06/20</td>
<td>Class Overview and Student Discussion of Applications to their Research</td>
<td>No Required Readings</td>
</tr>
</tbody>
</table>

No Readings required prior to the first session.

**Topics and References**

**Orientation and Introduction**

2. Alternatives Assessment
1. National Academy of Sciences
2. EPA: Design for the Environment (DfE)
3. Interstate Chemicals Clearinghouse (IC2)
4. Toxics use Reduction Institute (TURI - UMass Lowell)
5. The Organization for Economic Cooperation and Development (OECD) Toolbox

3. Green Chemistry
   1. Federal Pollution Prevention Act of 1990
   2. Green Chemistry’s 12 Principles
      1. https://www.epa.gov/greenchemistry/basics-green-chemistry#twelve

Background on Safer Products for Washington and Legal Requirements

1. Background
   1. Pollution Prevention for Health People and Puget Sound Act
   2. Focus Sheet
   3. Background Presentation from The Toxicology in Society Seminar Series
      (https://vimeo.com/511308356)

2. Discussion of the Identification of Priority Products
   1. Review legal requirements
   2. February 2020 Presentation
   3. Tools to identify priority products
      1. EPA Comptox: CP-CAT, CP-DAT
      2. Transparency Labels: Health product declarations
         (https://www.hpd-collaborative.org/hpd-public-repository/)

Discussion on the Methods for Identifying Safer, Feasible and Available Alternatives I

1. October 2020 Presentation
2. March 2021 Presentation
3. Working Draft Criteria for Safer
4. Working Draft Criteria for Feasible and Available

Discuss the Methods for Identifying Safer, Feasible and Available Alternatives II

1. NAS 2019 report
   (https://www.nap.edu/download/25412) on organohalogen flame retardants (most relevant summary pages 1-4)
2. Discuss the SPWA “class based approaches to safer products” in more detail
3. PFAS as a class article by DTSC
   (https://ehp.niehs.nih.gov/doi/10.1289/EHP7431)
4. Linda Birnbaum and Gina Soloman
   (https://iehn.org/assets/documents/Session4-BizNGO-2020.pptx) on class based regulation

Discuss draft findings for safer, feasible and available alternatives by product

APEs (laundry detergent- draft slides)

1. PFAS (furnishings, aftermarket treatments and carpet)
2. PCBs (paint)
3. Bisphenols ([thermal paper](https://www.ezview.wa.gov/Portals/_1962/Documents/saferproducts/June_2021_Webinar_Presentation.pdf) and food and drink cans)
4. Flame retardants (recreational foam products and electric and electronic products)
5. Phthalates (personal care and beauty products and vinyl flooring products)

**Overview of how we use feedback and how to submit a comment**

1. Examples of public comments  Pros and Cons, Structure

**Description of post-comment processes by Ecology**

**Course Summary:**

<table>
<thead>
<tr>
<th>Date</th>
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<tbody>
<tr>
<td>Mon Oct 4, 2021</td>
<td><a href="https://canvas.uw.edu/calendar?event_id=2355146&amp;include_contexts=course_1478690">ENV H 593 A Au 21: Current Topics In Risk Assessment</a></td>
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<td>Mon Oct 11, 2021</td>
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