Exponent®
Engineering & Scientific Consulting

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Professional Profile

Dr. Treble has over 30 years of experience in the chemical industry. She has expertise in the Toxic Substances Control Act (TSCA) compliance including new chemical notifications, chemical reporting, regulatory interpretation, internal auditing, and training. In addition, Dr. Treble has had responsibility for FDA compliance relating to food contact materials, excipients, and drug actives including managing drug master files, implementing GMPs, and performing risk assessments. Dr. Treble started her career in analytical chemistry specializing in chromatographic separations for chemicals and polymers.

Prior to joining Exponent, Dr. Treble held positions at Union Carbide Corporation and The Dow Chemical Company. Dr. Treble has led the American Chemistry Council TSCA Task Group and participated in meetings with the EPA to discuss modifications requested to proposed regulations. In addition she has presented talks relating to TSCA compliance at major conferences.

Academic Credentials & Professional Honors

Ph.D., Chemistry, University of Massachusetts, Amherst, 1978

B.S., Chemistry, University of Connecticut, 1974

Prior Experience

Product Regulatory Leader for TSCA Compliance, The Dow Chemical Company, 2009-2013

Product Regulatory Leader for FDA and TSCA Compliance, The Dow Chemical Company, 2001-2009

Assistant Director Regulatory Affairs, TSCA Compliance, Union Carbide Corporation, 1998-2001

Regulatory Manager, FDA Compliance, Union Carbide Corporation, 1996-1998, 2000-2001

Group Leader, Analytical Chemistry Department, Union Carbide Corporation, 1982-1996

Scientist, Liquid Chromatography, Union Carbide Corporation, 1978-1982

Professional Affiliations

American Chemical Society, 1976-present

Publications

Clark PJ, Treble IE, Uden PC. Adsorption HPLC of Tetradentate β-Ketoimine copper, nickel and palladium chelates. Polyhedron 1982; 1:785.

Uden PC, Bigley (Treble) IE, Walters FH. The separation of geometrical isomers and mixed ligand forms of cobalt (III) and chromium (III) β-Diketonates by high pressure liquid chromatography. Analytica Chimica Acta 1978; 100:555.

Uden PC, Bigley (Treble) IE. High pressure liquid chromatography of metal diethyldithiocarbamates with UV and DC argon plasma emission spectroscopic detection. Analytica Chimica Acta 1977; 94:29.

Presentations

Treble IE. EPA TSCA Declassification Program — An industrial perspective. GlobalChem Conference and Exhibition, Baltimore, MD, March, 2012.

Treble IE. Proposed changes to the EPA IUR Report — An industrial perspective. GlobalChem Conference and Exhibition, Baltimore, MD, March, 2011.

Treble IE. Implementation of GHS — An industrial perspective. GlobalChem Conference and Exhibition, Baltimore, MD, March 2008.

Project Experience

Submitted 10-15 TSCA new chemical submissions per year to EPA, resulting in commercialization of new chemicals including a low foam surfactant, diepoxide monomer, high performance transmission fluid, and urethane foam components.

Worked with American Chemistry Council in discussions with the EPA and the Office of Management & Budget regarding revision of the Inventory Update Proposed Rule (IUR). The goal was to help them understand the large resources required to gather the needed information to meet this rule and how certain information would result in poor quality data.

Was successful in obtaining a TSCA inventory correction for a chemical substance that had been listed on the original inventory. This required developing a laboratory program to generate new data to convince EPA that the chemical was misrepresented in the original submission. This allowed the substance to have a consistent identity globally and to be more easily used to generate derivatives.

Led the global multifunction team to implement the Globally Harmonized System of Hazard Communication for the corporation. As project leader, developed work processes for classifying products and making the necessary changes to the Hazard Communication documents (Safety Data Sheets). This process was successfully implemented with no negative effect on sales or distribution.

Developed a laboratory program that was successful in getting approval for an alternative PCB decontamination procedure for piping. This allowed a large amount of piping to be sold as scrap rather than disposed of as PCB waste.

Worked with business and product stewardship to complete and submit a GRAS notification for a modified cellulosic polymer. After review the FDA responded with a letter indicating that they did not question the basis for the GRAS determination. This conclusion allowed for expanded marketing of this product.

Developed trace liquid chromatography methods to support FDA food additive petitions for engineering polymers to be used in food contact applications. Petitions successfully passed FDA review opening up

new markets for these polymers.

Submitted new monograph to the Pharm Europa to allow for expanded use of a polymer for drug applications in the EU. Was the initial technical contact for the review which was ultimately successful in getting the new monograph approved.