Funding Strategies

Spokane River Regional Toxics Task Force

June 26, 2013

SRRTTF Funding Strategies

Table of Contents

SRRTTF F	unding Strategies	1
SRRTTF V	/ision Statement for the first five years:	3
SRRTTF F	unding Strategies Purpose Statement	3
Strategic	Direction	3
1)	Identify Needs	3
2)	Identify Potential Funding Sources	3
3)	Reach Out to Potential Funding Organizations and Partners	4
4)	Align SRRTTF Needs with the Funding Source Purpose and Mission	4
5)	Prioritize Funding Requests and Maximize Return on Effort	4
SRRTTF F	unding Strategy Work Group Structure	4
Appendic	ces	6
Appendi	ces Reference Chart	7
Appendix	x A: Toxics Source Characterization	7
A1. Ident	ify Existing PCB Sources, Loads, and Sinks in the Spokane River Watershed	7
A2. Ensu	re Quality of Source Characterization Activities	7
A1. Ident	ify Existing PCB Sources, Loads, and Sinks in the Spokane River Watershed	20
A2. Ensu	re Quality of Source Characterization Activities	21
A3. Ident	ify the Appropriate Source Characterization Modeling Tool for the Spokane River Watershed.	21
A4. Unde	erstand the Fate and Transport of PCB in the Watershed	22
A5. Colle	ct Watershed Data Phase 1	23
A6. Colle	ct Watershed Data Phase 2	23
	erstand the Role of Atmospheric Deposition as a Source to the Spokane River from global, and local sources	24
A8. Ident	ify List of "Inadvertently Produced" PCBs	24
A9. Produ	uct List of Consumer Products that May Contain PCB	25
A10. PCB	in Caulks	26
A11. Che	mical Action Plan for PCB	26
Appendix	x B: Identification of Best Management Practices	.28
B1: Ident	ification of Best Management Practices for Reducing PCB Sources	28
B2. Resea	arch: Biochar Treatment Technology	29

B3: Research: Algae Treatment Technology	
B4. Best Management Practice: Demolition standards	31
B5. Best Management Practice: Stormwater Treatment and Infiltration	31
B6. Enhanced Treatment at Wastewater Treatment Facilities	32
B7. Urban Waters Initiative	32
B8. PCB-Free Motor Oil	34
B9. PCB-Free Personal Care Products	34
Appendix C: Implementation: Strategic Actions	35
C1. Facilitation of the Spokane River Regional Toxics Task Force	35
C2. Evaluation of Regulatory Barriers to PCB Source Reduction	35
C3. Agency Messaging	
C4. Education and Outreach	36
C5. Integrated Clean Water Planning	37
C6. Align PCB Standards between Environmental Programs	
Appendix D: Implementation: Watershed Actions	39
D1. Consumer Choice Education and Labeling	39
D2. Green Purchasing: Agency Programs	39
D3. Toxic Substances Control Act Regulatory Reform	40
D4. Green Chemistry: PCB Free Pigments	41
D5. Elimination of PCB from Pigments	41
D6. Elimination of PCB from other sources	42
D7. Align Analytical Methodologies	43
D8. Align PCB Standards between Environmental Programs	43
D9. Identify Potential Research for Stormwater Abatement/Treatment Technologies	44
D10. Identify Potential Research for Wastewater Treatment/Abatement Technologies	44
Appendix E: Assessment of Progress	46
E1. Environmental Assessment and Toxics Monitoring	46
E2. Toxics Management Plans: Implementation	46
E3. Municipal and Industrial NPDES Wastewater Discharge Solutions	47

SRRTTF Funding Strategies

SRRTTF Vision Statement for the first five years:

The Regional Toxics Task Force works collaboratively to (1) characterize the sources of toxics in the Spokane River and (2)identify and implement appropriate actions needed to make measurable progress towards meeting applicable water quality standards for the State of Washington, State of Idaho, and The Spokane Tribe of Indians and in the interests of public and environmental health.

SRRTTF Funding Strategies Purpose Statement

To: Coordinate and support the Spokane River Regional Toxics Task Force (SRRTTF) in providing consistent and predictable funding needed to accomplish the actions that will result in toxics reductions for the Spokane River.

In a way that:

- Is strategic, holistic, and forward thinking and compliments the vision and purpose of the SRRTTF.
- Serves as a clearing house that identifies tracks, evaluates, prioritizes, and communicates funding opportunities in a timely manner.
- Responds to the technical and administrative needs of the SRRTTF.
- Leverages the value of monetary and in-kind contributions provided by SRRTTF members.
- Partners with outside organizations on opportunities that are of mutual benefit.

Strategic Direction

1) Identify Needs

The SRRTTF Vision Statement will serve as a fundamental guideline for identifying Task Force needs.

2) Identify Potential Funding Sources

The SRRTTF will identify, evaluate, and pursue funding sources based on the ability of those sources to meet the Task Force needs.

- Task Force members direct funding of activities
- Task Force members in-kind funding¹
- Agency direct funding of Task Force activities

¹ Federal Definition for grant applications: Third party in-kind contributions may be in the form of real property, equipment, supplies and other expendable property, and the value of goods and services directly benefiting and specifically identifiable to the project or program.

- Agency in-kind funding
- Agency projects in support of effort
- Grants to nonprofit organizations in support of effort
 - o Government (State, Federal)
 - o Foundations
- Grants to Universities/Academia in support of effort
 - o EPA Science to Achieve Results
 - o P3 Award Program
- Professional organizations
 - o ACS Green Chemistry Institute Grants
 - o Water Environment Research Foundation Grants
 - Water Environment Federation (WEF)
 - o National Association of Clean Water Agencies
- Partnerships with research centers
 - o Center for Sustainable Materials (University of Oregon)
 - o Center for Environmental Research and Outreach (CEREO)
 - o Water Environment Research Foundation
- Partnerships with current and/or former toxics producers/suppliers
- Donations/Gifts

3) Reach Out to Potential Funding Organizations and Partners

Use the diverse strengths and professional networks of the individual partners of the organization to identify, communicate with, and engage potential funding organizations and partners.

4) Align SRRTTF Needs with the Funding Source Purpose and Mission

When communicating with the potential funding source, the SRRTTF will identify how the needs of the Task Force align with the purpose and mission of the funding organization.

5) Prioritize Funding Requests and Maximize Return on Effort

The SRRTTF will evaluate funding opportunities, identify strategy, and prioritize response based on

- Funding opportunity fulfills short term vs. long term need
- Ability of Task Force to access funding (level of effort needed)
- Match of the funder's mission with the Task Force mission
- Amount of funding available
- Competitiveness of funding opportunity

SRRTTF Funding Strategy Work Group Structure

A Funding Work Group will be organized to execute the duties required by the SRRTTF Funding Strategy. The Funding Work Group will include a variety of key SRRTTF members or supporting staff with knowledge of funding strategies, grant opportunities, grant writing and other facets essential to execute the SRRTTF funding strategy. Examples of responsibilities, tasks and roles include:

- Actively engage in tracking and evaluating funding opportunities on behalf of the SRRTTF
- Assign specific tasks to help position the SRRTTF for funding and collaboration opportunities (e.g., networking with University researchers, communication with legislators)
- Write and submit grant applications
- Develop public education approaches that can be incorporated into funding applications or implemented through in-kind efforts and/or collaboration with others

Appendices

Introduction

The purpose of these Appendices is to facilitate Steps 1 and 2 of the Funding strategy. The Task Force work is ongoing. Priorities and projects may change as more information is collected. Therefore, these Appendices are expected to be "living documents," subject to change as the needs of the Task Force changes.

Step 1, "Identify Needs," is represented by a range of projects that are of interest to the SRRTTF. To develop the list, the Task Force created a set of projects based on perceived needs. The Task Force did not prioritize the basic list and order of the projects in these appendices is not an indication of funding priority or Task Force preference.

Step 2, "Identify Funding Sources," is represented by the list of possible funding and partnership organizations. By identifying potential funding sources and partnerships in advance, the Task Force can be prepared to respond quickly should opportunities arise. The list of potential funding sources and partners are suggestions since all partnerships are encouraged.

The organization of the Appendices follows the a logical progression of source characterization (Appendix A), identification of targeted Best Management Practices for the Spokane River (Appendix B), the Strategic Actions needed to achieve Task Force goals (Appendix C), broader actions needed to achieve success on a watershed basis that can also be useful in other watersheds (Appendix D), and activities that are needed to assess progress (Appendix E).

The projects are broken into discrete but related activities. This optimizes flexibility with respect to finding funding and/or sponsor organizations. By identifying the discrete needs, the Task Force can more closely with the funding organizations during the planning and budgeting process.

If a project has a connection or dependency on another project, it is noted under "Related Activities."

Appendices Reference Chart

Title	Partner Organizations	Funding Options	Related to:
Appendix A: Toxics Source Characterization			
A1. Identify Existing PCB Sources, Loads, and Sinks in the	Spokane River Stewardship Partners	Spokane River Stewardship Partners	A2, A3, A4, A5, A6
Spokane River Watershed	Department of Ecology Idaho Dept of Environmental Quality	Department of Ecology Interagency Agreement	
	Environmental Protection Agency	Academia	
	Responsible Source Contributors	Scientific and Trade Organizations	
	Academia	Partner Organization in kind contributions	
	Scientific and Trade Organizations		
A2. Ensure Quality of Source Characterization Activities	Spokane River Stewardship Partners	Spokane River Stewardship Partners	A1, A3, A4, A5, A6
	Department of Ecology	Department of Ecology	
	Idaho Dept of Environmental Quality	Partner Organization in-kind	
	Environmental Protection Agency	contributions	
	Academia	Academia	
	Scientific and Trade Organizations	Scientific and Trade Organizations	
A3. Identify the Appropriate Source Characterization	Spokane River Stewardship Partners	Spokane River Stewardship Partners	A1, A2, A7, A4, A5, A6
Modeling Tool for the Spokane River Watershed	Department of Ecology	Department of Ecology Partner Organization in-kind	
	Idaho Dept of Environmental Quality	contributions	
	Environmental Protection Agency		

Title	Partner Organizations	Funding Options	Related to:
A4. Understand the Fate and Transport of PCB in the Watershed	Spokane River Stewardship Partners	Spokane River Stewardship Partners	A1, A2, A3, A7, A5, A6
	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Idaho Dept. of Environmental Quality	
	Environmental Protection Agency	Environmental Protection Agency	
		Partner Organization in-kind contributions	
A5. Collect Watershed Data Phase 1	Spokane River Stewardship Partners	Spokane River Stewardship Partners	A1, A2, A3, A4, A6
	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind contributions	
A6. Collect Watershed Data Phase 2	Spokane River Stewardship Partners	Spokane River Stewardship Partners	A1, A2, A3, A4, A5
	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind contributions	
A7. Understand the Role of Atmospheric Deposition as a	Department of Ecology	Department of Ecology	A3, A4
Source to the Spokane River from global, regional, and local sources.	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind	
	Spokane Regional Clean Air Agency	contributions	
	Academia	Academia	

Partner Organizations	Funding Options	Related to:
Environmental Protection Agency	Environmental Protection Agency	A9, A10, A11
Department of Ecology	Department of Ecology	
Universities and Research Organizations	Non-profit organizations and	
Chemical Manufacturers and Trade Organizations	Foundations	
Municipal and industrial dischargers	Partner Organizations	A8, A10, A11, D3
Department of Ecology	Department of Ecology Environmental	
Environmental Protection Agency	Protection Agency	
Chemical Manufacturers and Trade Organizations	Chemical Manufacturers and Trade Organizations	
Environmental Protection Agency	Partner Organizations	A10, A11
Department of Ecology	Department of Ecology	
Spokane Regional Health District	Environmental Protection Agency	
Local School Districts		
Municipal and industrial dischargers	Department of Ecology	A8, A9, A10
Department of Ecology		
Environmental Protection Agency		
	Environmental Protection Agency Department of Ecology Universities and Research Organizations Chemical Manufacturers and Trade Organizations Municipal and industrial dischargers Department of Ecology Environmental Protection Agency Chemical Manufacturers and Trade Organizations Environmental Protection Agency Department of Ecology Spokane Regional Health District Local School Districts Municipal and industrial dischargers Department of Ecology	Environmental Protection AgencyEnvironmental Protection AgencyDepartment of EcologyDepartment of EcologyUniversities and Research OrganizationsNon-profit organizations and FoundationsChemical Manufacturers and Trade OrganizationsPartner OrganizationsMunicipal and industrial dischargersPartner OrganizationsDepartment of EcologyDepartment of Ecology Environmental Protection AgencyChemical Manufacturers and Trade OrganizationsDepartment of Ecology Environmental Protection AgencyChemical Manufacturers and Trade OrganizationsChemical Manufacturers and Trade OrganizationsEnvironmental Protection Agency OrganizationsPartner OrganizationsEnvironmental Protection Agency OrganizationsPartner OrganizationsEnvironmental Protection Agency Department of EcologyPartner OrganizationsEnvironmental Protection Agency Department of EcologyDepartment of EcologySpokane Regional Health District Local School DistrictsEnvironmental Protection AgencyMunicipal and industrial dischargers Department of EcologyDepartment of Ecology

Appendix B: Identification of Best Management Practices			
Title	Partner Organizations	Funding Options	Related to:
B1. Identification of Best Management Practices for Reducing	Spokane River Stewardship Partners	Spokane River Stewardship Partners	A1, A2, A3, A4, A5, A6
PCB Sources	Department of Ecology	Department of Ecology	
	Idaho Department of Environmental	Environmental Protection Agency	
	Quality	Partner Organization in-kind	
	Environmental Protection Agency	contributions	
	Scientific Organizations/Academia		
	Other Watersheds (Delaware basin, Duwamish, Puget Sound, Portland Harbor, etc.)		
B2. Research: Biochar Treatment Technology	Department of Ecology	Spokane River Stewardship Partners	D9
	Idaho Dept. of Environmental Quality	Department of Ecology	
	Environmental Protection Agency	Environmental Protection Agency	
	Washington State University	Partner Organization in-kind	
	Academia	contributions	
	Treatment Technology Suppliers/Experts	Academia	
	Other Watersheds	Treatment Technology Suppliers/Experts (Pilot testing of technologies and/or in- kind services).	

Title	Partner Organizations	Funding Options	Related to:
B3. Research: Algae Treatment Technology	Spokane River Stewardship Partners	Inland Empire Paper - Spokane River	D10
	Department of Ecology	Stewardship Partners	
	Idaho Dept. of Environmental Quality	Department of Ecology	
	Environmental Protection Agency	Environmental Protection Agency	
	Academia	Partner Organization in-kind	
		contributions	
	Treatment Technology Suppliers/Experts	Academia	
	Other Watersheds	Treatment Technology Suppliers/Experts	
		(For pilot testing of technologies and/or	
		in-kind services)	
B4. Best Management Practice: Demolition standards	Department of Ecology	Department of Ecology	A10
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind	
	Spokane Regional Clean Air Agency	contributions	
	Various		
	Contracting/Construction/Environmental		
	Mitigation Organizations		
B5. Best Management Practice: Stormwater Treatment and	Spokane River Stewardship Partners	Spokane River Stewardship Partners	D9
Infiltration	Department of Ecology	Department of Ecology	City of Spokane
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	Integrated Plan
	Environmental Protection Agency	Partner Organization in-kind	
		contributions	

Title	Partner Organizations	Funding Options	Related to:
B6. Enhanced Treatment at Wastewater Treatment Facilities	Spokane River Stewardship Partners	Spokane River Stewardship Partners	Next Level of
	Department of Ecology	Ecology State Revolving Fund	Treatment
	Idaho Department of Environmental Quality		D10
	Environmental Protection Agency		
B7. Urban Waters Initiative	Department of Ecology	Department of Ecology	
	Spokane Regional Health District.	Environmental Protection Agency	
	Spokane River Forum		
	Spokane Aquifer Joint Board		
B8. PCB-Free Motor Oil	Department of Ecology	Department of Ecology	C4
	Spokane Regional Health District.	Environmental Protection Agency	
	Spokane River Forum	Small Business grants and loans	
B9. PCB-Free Personal Care Products	Department of Ecology	Department of Ecology	A8, A9, C4
	The Lands Council	Environmental Protection Agency	
		Foundation Grants	

Appendix C: Implementation Strategic Actions			
Title	Partner Organizations	Funding Options	Related to:
C1. Facilitation of the Spokane River Regional Toxics Task	Spokane River Stewardship Partners	Spokane River Stewardship Partners	
Force	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind	
	Other Regulatory Agencies (SDOH, DOT, etc.)	contributions	
	Conservation Groups		
C2. Evaluation of Regulatory Barriers to PCB Source Reduction	Department of Ecology	Department of Ecology	A9,C4, D1
heudelion	Idaho Dept. of Environmental Quality	Idaho Dept. of Environmental Quality	
	Environmental Protection Agency	Environmental Protection Agency	
C3. Agency Messaging	Department of Ecology	Department of Ecology	A9,C4, D1
	Idaho Dept. of Environmental Quality	Idaho Dept. of Environmental Quality	
	Environmental Protection Agency	Environmental Protection Agency	
C4. Education and Outreach	Spokane River Stewardship Partners	City of Spokane and Spokane River	A9, C3, D1
	Department of Ecology	Stewardship Partners	
	Idaho Dept. of Environmental Quality	Department of Ecology	
	Environmental Protection Agency	Environmental Protection Agency	
	Health Departments	Partner Organization in-kind contributions	

Title	Partner Organizations	Funding Options	Related to:
C5. Integrated Clean Water Planning	City of Spokane	City of Spokane	B5
	Washington and Idaho Municipal Dischargers and Stormwater Agencies Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency	Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions	
C6. Align PCB Standards between Environmental Programs	Spokane River Stewardship Partners Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency	Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in kind contributions	A2, A5, A6

Appendix D: Implementation: Watershed Actions			
D1. Consumer Choice Education and Labeling	Spokane River Stewardship Partners Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency	 Spokane River Stewardship Partners (education) Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions 	A9, C3, C4
D2. Green Purchasing: Agency Programs	Department of Ecology	Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions	A8, A9, C4, D1
D3. Toxic Substances Control Act Regulatory Reform	Spokane River Stewardship Partners Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency	Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions	A8, A9 , A10, A11, D4, D5, D6

Title	Partner Organizations	Funding Options	Related to:
D4. Green Chemistry: PCB Free Pigments	Spokane River Stewardship Partners Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency	Inland Empire Paper - Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions	D5
D5. Elimination of PCB from Pigments	Inland Empire Paper Co Spokane River Stewardship Partners Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency Other stakeholder organizations Chemical/Pigment Manufacturers	Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Chemical/Pigment Manufacturers (In kind to find PCB-free alternatives)	D3, D5, D6
D6. Elimination of PCB from other sources	Spokane River Stewardship PartnersDepartment of EcologyIdaho Dept. of Environmental QualityEnvironmental Protection AgencyOther stakeholder organizationsChemical/Pigment Manufacturers	Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Chemical/Pigment Manufacturers	A8, A9, A10, A11, D4, D3, D6, D5

Title	Partner Organizations	Funding Options	Related to:
D7. Align Analytical Methodologies	Spokane River Stewardship Partners	Spokane River Stewardship Partners	C2, C6, A2, A5, A6
	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind contributions	
D8. Align PCB Standards between Environmental Programs	Spokane River Stewardship Partners	Spokane River Stewardship Partners	C2, C6, A2, A5, A6
	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind	
		contributions	
D9. Identify Potential Research for Stormwater Abatement/Treatment Technologies	Spokane River Stewardship Partners	Spokane River Stewardship Partners	С4, В5
	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Partner Organization in-kind	
	Responsible Source Contributors	contributions	
	Academia	Water Environment Research Foundation	
	Scientific and Trade Organizations	Grants	
	Water Environment Federation		

Title	Partner Organizations	Funding Options	Related to:
D10. Identify Potential Research for Wastewater	Spokane River Stewardship Partners	Spokane River Stewardship Partners	С5, В6
Treatment/Abatement Technologies	Department of Ecology	Department of Ecology	
	Idaho Dept. of Environmental Quality	Environmental Protection Agency	
	Environmental Protection Agency	Water Environment Research Foundation	
	Responsible Source Contributors	Grants	
	Academia	Partner Organization in-kind	
	Scientific and Trade Organizations	contributions	
	Water Environment Federation		

Appendix E: Assessment of Progress			
E1. Environmental Assessment and Toxics Monitoring	Spokane River Stewardship Partners Department of Ecology	Department of Ecology Environmental Protection Agency	A2, A3, A7, A4, A5, A6
	Idaho Dept. of Environmental Quality Environmental Protection Agency Other stakeholders	Partner Organization in-kind contributions	
E2. Toxics Management Plans: Implementation	Spokane River Stewardship Partners Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency	Spokane River Stewardship Partners Partner Organization in-kind contributions	A9, A10, A11, B1, B4, B5, C2, C3, C4, C5, D1, D2, D6, D9, D10, E1
E3. Municipal and Industrial NPDES Wastewater Discharge Solutions	Spokane River Stewardship Partners Department of Ecology Idaho Dept. of Environmental Quality Environmental Protection Agency	Spokane River Stewardship Partners Other stakeholders	D10

Appendix A: Toxics Source Characterization

Where are the toxics (PCBs and dioxins) coming from, how do they move through the environment, and how do they enter the river?

A1. Identify Existing PCB Sources, Loads, and Sinks in the Spokane River Watershed

Currently Funded by members of the SRSP and the Department of Ecology

Problem Statement: The Spokane River has been the subject of toxics investigations for more than 20 years. The most recent assessment of the river noted that approximately half of the PCB inputs to the Spokane River are unaccounted for and the movement of PCBs through the Spokane River Watershed is not well-understood. The SRRTTF desires to define the data needs for the watershed, and the ways in which the data needs can be satisfied. An initial step in the process is the collection of all available data in the watershed as well as other known and potential sources of data that can be used for measurement, modeling and literature review. LimnoTech, Inc. has been hired by the SRRTTF as an independent consultant to assist in this process. Tasks 2, 4, 5, and 6 of Phase 1a of LimnoTech's scope of work is the listing all of the information required to define existing PCB and dioxin sources, loads and sinks; the collection of existing data; the evaluation of the quality and credibility of the data; and a data gaps analysis.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Responsible Source Contributors Academia Scientific and Trade Organizations

Funded by:

Spokane River Stewardship Partners Department of Ecology Interagency Agreement Academia Scientific and Trade Organizations Partner Organization in-kind contributions

Related Activities: A2, A3, A4, A5 and A6.

A2. Ensure Quality of Source Characterization Activities

Currently Funded by members of the SRSP and the Department of Ecology

Problem Statement: The SRRTTF desires to have accurate, precise, and comparable data for evaluation of the sources of toxics (PCB and dioxin) in the Spokane River. LimnoTech, Inc. has been hired by the SRRTTF as an independent consultant to assist with the source characterization. Task 3 of Phase 1a of LimnoTech's Scope of Work is the review of standard operating procedures for data collection and analysis that is currently used by all agencies during the project. The deliverable of this task is a memo summarizing the standard operating procedures, identifying any procedures that will not produce suitable data quality.

Partner Organizations:

Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Academia Scientific and Trade Organizations

Funded by: Spokane River Stewardship Partners Department of Ecology Partner Organization in-kind contributions Academia Scientific and Trade Organizations

Related Activities: A1, A3, A4, A5 and A6

A3. Identify the Appropriate Source Characterization Modeling Tool for the Spokane River Watershed

Problem Statement: Water quality modeling can be a cost effective tool that leads to an understanding of how toxic substances behave in the watershed. Water quality models have been used to simulate the major physical, chemical, and biological processes that occur in a system. LimnoTech, Inc. has been hired by the SRRTTF as an independent consultant to assist with identifying and summarizing the modeling tools that are suitable for use in evaluation of the watershed (Task 7, Phase 1b of the <u>Technical</u> <u>Consultant Work Plan</u>).

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality **Environmental Protection Agency**

Funded by: Spokane River Stewardship Partners Department of Ecology Partner Organization in-kind contributions

Related Activities: A1, A2, A7, A4, A5 and A6

A4. Understand the Fate and Transport of PCB in the Watershed

Problem Statement: There is an incomplete understanding about how PCB enters and moves through the Spokane River watershed. The application of a water quality model to the watershed can be used to describe the sources and sinks of PCB in the watershed. (Phase 3 of the <u>Technical Consultant Work</u> <u>Plan</u>).

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A1, A2, A3, A7, A5 and A6

A5. Collect Watershed Data Phase 1

Problem Statement: Problem Statement: The Spokane River has been the subject of toxics investigations for more than 20 years. The most recent assessment of the river noted that approximately half of the PCB inputs to the Spokane River are unaccounted for and the movement of PCB through the Spokane River Watershed is not well-understood. The SRRTTF desires to collect the necessary data needed to characterize the inputs of PCBs and dioxins to the Spokane River. LimnoTech, Inc. has been hired by the SRRTTF as an independent consultant to assist with developing a data collection strategy, Quality Assurance Project Plan(s) in preparation for data collection (Tasks 8 and 9, Phase 1b and of the <u>Technical Consultant Work Plan</u>).

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A1, A2, A3, A4, A6

A6. Collect Watershed Data Phase 2

Problem Statement: The Spokane River has been the subject of toxics investigations for more than 20 years. The most recent assessment of the river noted that approximately half of the PCB inputs to the Spokane River are unaccounted for and the movement of PCB through the Spokane River Watershed is not well-understood. The SRRTTF desires to collect the necessary data needed to characterize the inputs of PCBs and dioxins to the Spokane River. This involves the collection of data in the Spokane Watershed in accordance with SRRTTF's data collection strategy, and approved Quality Assurance Project Plan(s). (Phase 2 of the <u>Technical Consultant Work Plan</u>)

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A1, A2, A3, A4, A5

A7. Understand the Role of Atmospheric Deposition as a Source to the Spokane River from global, regional, and local sources.

Problem Statement: The Department of Ecology conducted a literature search identifying the potential for atmospheric deposition of PCB to the watershed. Environmental studies in the watershed have also shown correlations with snow, rainfall, stormwater, and seasonal relationships. These sources (global, regional, and local) are not well understood. A better understanding of the quantity and composition of atmospheric PCB deposition is needed.

Partner Organizations: Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Spokane Regional Clean Air Agency Academia

Potential Funding Sources: Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Academia

Related Activities: A3, A4

A8. Identify List of "Inadvertently Produced" PCBs

Problem Statement: In 40 Code of Federal Regulations (CFR), Part 761.3, the regulation states that "inadvertently produced" PCBs may be present in a manufacture process at an average concentration of 25 ppm up to 50 ppm maximum. This amount is 781,250,000 times greater than EPA's Human Health Water Quality Criteria (HHWQC) of 64 pg/L (parts per quadrillion). A 1983 publication by USEPA cites a report from Versar, Inc. stating that there are more than 200 chemical processes that can result in the production of "inadvertently produced" PCBs. Appendix A in the publication provides a general list of the chemical intermediates which could contain PCB. It does not, however, contain a list of the 200

chemical processes. Consumer products and other sources containing these allowable inadvertently produced PCBs are entering the environment through many different mechanisms (municipal wastewater, stormwater, paper recycling, ambient distribution and deposition). Further information is needed to identify the relevancy of this list and prioritize processes, chemicals, and products that could be contributing PCB to the environment.

Partner Organizations: Environmental Protection Agency Department of Ecology Universities and Research Organizations Chemical Manufacturers and Trade Organizations

Potential funding sources: Environmental Protection Agency Department of Ecology Non-profit organizations and Foundations

Related Activities: A9, A10, A11

A9. Product List of Consumer Products that May Contain PCB

Problem Statement: Literature review and preliminary work done by SRRTTF participants have identified that PCB may be present in consumer products that are routinely purchased through retail outlets and used in the Spokane watershed. Disposal of these products through the sanitary sewer or storm drain system is a conduit for introduction of PCB to the river. More information is needed to identify and quantify the levels of PCB in commonly used products. This information can be used for source assessment, development of Best Management Practices, consumer choice campaigns, health education, and support of the Toxics Substances Control Act regulatory reform.

Partner Organizations: Municipal and industrial dischargers Department of Ecology Environmental Protection Agency Chemical Manufacturers and Trade Organizations

Potential funding sources: Partner Organizations Department of Ecology Environmental Protection Agency Chemical Manufacturers and Trade Organizations

Related Activities: A8, A10, A11, D5

A10. PCB in Caulks

Problem Statement: In recent years, EPA has learned that caulk containing potentially harmful levels of PCBs was used in many buildings, including schools, in the 1950s through the 1970s. Most schools and buildings built after 1979 do not show significant levels of PCBs in caulk. On September 25, 2009, EPA announced new guidance for school administrators and building managers with important information about managing PCBs in caulk and tools to help minimize possible exposure. More information is needed in the Spokane watershed regarding the presence of PCBs in caulk in schools, public buildings, and buildings undergoing demolition. Through <u>EPA PCB Regional Coordinators</u>, the Agency plans to assist communities in identifying potential problems and, if necessary, developing plans for PCB testing and removal.

Partner Organizations: Environmental Protection Agency Department of Ecology Spokane Regional Health District Local School Districts

Potential funding sources: Partner Organizations Department of Ecology Environmental Protection Agency

Related Activities: A10, A11

A11. Chemical Action Plan for PCB

Funded by Department of Ecology

Problem Statement: Persistent, bioaccumulative toxics (PBTs) are a distinct group of chemicals that threaten the health of people and the environment. PCB is an example of a PBT. PBTs are considered the "worst of the worst" and raise special challenges for our society and the environment because:

- They remain in the environment for a long time without breaking down (persistent).
- Animals and people accumulate PBTs in their bodies. As these chemicals move up the food chain, they increase in concentration, and linger for generations in people and the environment (bioaccumulate).
- Exposure to PBTs has been linked to a wide range of toxic effects in fish, wildlife, and humans, including effects on the nervous system, reproductive and developmental problems, immune-response suppression, cancer, and endocrine disruption (toxic).
- PBTs can travel long distances and generally move easily between air, water and land, spanning boundaries of programs, geography, and generations.

The PBT Initiative focuses on one toxic substance at a time through the development of a Chemical Action Plan. A Chemical Action Plan (CAP) is a comprehensive plan to identify, characterize and evaluate all uses and releases of a specific PBT, a group of PBTs or metals of concern. A CAP is a plan, not legislation or a rule. It recommends actions to protect human health and the environment. Some of the recommendations may lead to new legislation or rules. These would go through the normal legislative or rulemaking process.

Ecology develops each CAP in collaboration with other agencies and experts representing various businesses, agricultural and advocacy sectors. PCBs are a current priority for Ecology in several geographic areas such as the Duwamish River and Spokane River. Concerns are growing about PCBs as a contaminant in products including inks and dyes. Ecology is also working to develop human health criteria for water quality standards, and PCBs are a key chemical of concern in this process. A PCB CAP will take an inclusive look at the sources of PCBs in Washington and make recommendations to reduce exposures.

Partner Organizations: Municipal and industrial dischargers Department of Ecology Environmental Protection Agency

Funded by: Department of Ecology

Related Activities: A8, A9, A10

Appendix B

Identification of Best Management Practices

What actions are needed to reduce the inputs of PCB and dioxins to the Spokane River?

B1: Identification of Best Management Practices for Reducing PCB Sources

Problem Statement: The identification and implementation of Best Management Practices (BMPs) can be effective in reducing the input of PCBs to the river. BMPs, which are source-specific, can be identified from scientific literature. We may also identify inputs of PCB to the river that have not been fully investigated by the scientific community. A range of BMPs are needed and the SRRTTF may be on the leading edge with respect to BMP development. The needed BMPs can vary in the cost of implementation and expected pollutant removal efficiency. Modeling can be used to simulate a range of combinations of BMPs, and determine which specific mix of BMPs is required to meet pollutant targets. Based on modeling results, the specific mix of BMPs can be identified and included in a comprehensive source reduction plan. The plan would summarize the sources of PCBs in the Spokane River, identifies potential BMPs, and recommends an implementation plan for measures (BMPs) to reduce PCBs in the Spokane River watershed. (Phase 4 of the Technical Consultant Work Plan)

Partner Organizations:

Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Scientific Organizations/Academia Other Watersheds (Delaware basin, Duwamish, Puget Sound, Portland Harbor, etc.)

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A1, A2, A3, A4, A5, A6

B2. Research: Biochar Treatment Technology

Problem Statement: PCBs have been identified in urban stormwater runoff has been identified as a source of PCB. Unless PCBs are removed from the stormwater, the PCBs continue to remain in the environment. Biochar has been identified as a waste product that can be put to use in stormwater treatment. Further research is needed to find ways to use biochar in the treatment of stormwater, for removal and potential destruction of PCBs.

Partner Organizations: Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Washington State University Academia Treatment Technology Suppliers/Experts Other Watersheds

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Academia Treatment Technology Suppliers/Experts (Pilot testing of technologies and/or in-kind services).

Related Activities: D9

B3: Research: Algae Treatment Technology

Problem Statement: Industrial and municipal wastewater require treatment to remove PCB. Algae can potentially be used to remove both PCB and phosphorus from wastewater. Further research is needed to identify how this technology can be used to reduce the loading of PCB to the Spokane River.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Academia Treatment Technology Suppliers/Experts Other Watersheds

Potential funding sources: Inland Empire Paper - Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Academia Treatment Technology Suppliers/Experts (For pilot testing of technologies and/or in-kind services) *Related Activities:* D10.

B4. Best Management Practice: Demolition standards

Problem Statement: PCB has been identified as a contaminant in concrete and caulk. The introduction of PCB to the environment can be mitigated by implementing best management practices for demolition. Once Best Management Practices have been identified for this PCB source, a combination of technical, regulatory, and local ordinances can be used to implement them within the Spokane watershed.

Partner Organizations: Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Spokane Regional Clean Air Agency Various Contracting/Construction/Environmental Mitigation Organizations

Potential funding sources: Department of Ecology Environmental Protection Agency Partner Organization in kind contributions

Related Activities: A10

B5. Best Management Practice: Stormwater Treatment and Infiltration

Problem Statement: PCBs have been identified as a contaminant in stormwater. Municipal separate storm sewer systems (MS4s) convey stormwater to the Spokane River. One potential BMP to prevent PCBs from entering the river through stormwater is through treatment and infiltration. Many treatment technologies exist, including media filtration and other proprietary devices, low impact development, and conventional treatment.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential Funding Sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: D9, City of Spokane Integrated Plan

B6. Enhanced Treatment at Wastewater Treatment Facilities

Problem Statement: PCBs have been identified as a contaminant in municipal wastewater. Several municipalities discharge treated effluent to the Spokane River. Dischargers have continually upgraded treatment plants over the past several decades to reduce pollutants entering the Spokane River through effluent. The Dissolved Oxygen TMDL on the Spokane River set strict wasteload allocations for phosphorus, CBOD, and ammonia, prompting wastewater treatment facilities to install sophisticated treatment technologies to meet these criteria. These technologies will also greatly reduce the concentration of PCBs in effluent. Spokane County's new facility was designed to meet the DO TMDL wasteload allocations and consequently also has very low PCB concentrations. Enhanced treatment facilities are currently in the design phase in other municipalities and are anticipated to have a similar PCB reduction.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential Funding Sources: Spokane River Stewardship Partners

Related Activities: Next Level of Treatment D10.

B7. Urban Waters Initiative

Problem Statement: The ecology of urban waters poses special challenges due to concentrated human activity over a long period of time. The typical urban environment exposes these waters – including their shores and sediments (mud at the bottom of the waterway) – to many sources of pollution. These sources include industry, businesses, municipal wastewater, stormwater, spills, marinas, septic systems and many other sources. In addition, the big urban populations next to these waters add pollution from households, ranging from cleaners to paints, to motor oil.

These pollutants cause many problems for urban waters: dirty shorelines and beaches; contamination of fish habitat; and toxic substances entering the food chain. Cleanups are expensive to business and taxpayers and polluted areas often cannot be used for development, industry or recreation. Pollutants have cycled through the environment over time making cleanup complicated and extend over decades.

The Washington Department of Ecology developed the Urban Waters Initiative to focus on the special environmental challenges faced by urban water bodies. The initiative gives a boost to ongoing efforts to find and control pollution sources before they enter these waters. The aim is to prevent contamination or re-contamination of waterways and lend additional resources to cleanup and research where needed.

Re-contamination occurs when a polluted waterway that has already been cleaned up starts becoming polluted again.

The Spokane River Urban Waters Team is a cross-program unit within Ecology designed to fill knowledge gaps about the pollutants and then take action quickly and efficiently. The Urban Waters Team works with local utilities, industry, and the Spokane River Regional Toxics Task Force to assist with focusing source tracking, cleanup, and long term prevention efforts.

The Urban Waters Team also partners with the Spokane Regional Health District through the Local Source Control Partnership to tackle the business outreach branch of work. The Local Source Control specialists work with small businesses to identify and prevent pollution from reaching the river through sediment, storm drains, and combined sewers. In particular, the team is looking for pollutants that contain lead and other heavy metals, polychlorinated biphenyls (PCBs), PBDEs (flame retardants), dioxins and furans.

During visits to businesses specialists from the Urban Waters Team pay particular attention to the following practices:

- Industrial processes that generate wastewater
- Pretreatment of wastewater
- Hazardous and solid waste disposal
- Activities that are at high risk for generating pollution
- Spill prevention
- Maintenance of stormwater structures and registration of drywells
- Maintenance practices that take place outside
- Management of wash water
- Outdoor storage of products and waste

The Spokane Regional Health District works closely with The Spokane River Forum and Spokane Aquifer Joint Board to offer the EnviroStars business incentive program which recognizes businesses that have implemented practices and policies to properly manage hazardous waste and conserve resources.

A clean river is good for the community and good for business. Working together as a community, we will ensure that future generations have enough clean water to sustain a healthy lifestyle and economy.

Partner Organizations: Department of Ecology Spokane Regional Health District.

Funded by: Department of Ecology Environmental Protection Agency

B8. PCB-Free Motor Oil

Problem Statement: Consumer motor oil can contain PCB. PCB in motor oil can reach the river through stormwater from improper disposal practices and from vehicles leaks and drips. Another source of PCB to the river is in motor oil used in 2-cycle engines, such as outboard motors. The use of PCB-free oil can be encouraged through market incentives, consumer education, and best management practices.

Partner Organizations: Department of Ecology Spokane Regional Health District. Spokane River Forum

Potential Funding Sources: Department of Ecology Environmental Protection Agency

B9. PCB-Free Personal Care Products

Problem Statement: Problem Statement: Recently, manufacturing by-product PCBs have been identified in wastewater, sediments, and air in numerous locations. They have also been positively identified in testing of new products colored with such pigments, so it is clear these PCBs are not occurring as a result of legacy commercial mixtures. What is emerging is an increasingly complex picture of the prevalence of nonlegacy PCBs alongside the persisting environmental presence of legacy PCBs, and a concurrent and likewise complex picture of how PCBs can affect human health at very low levels of exposure. Health care products such as toothpaste, sunscreen, and even some foods containing pigments such as titanium dioxide may contain PCB's. Chlorinated pigments are the likely source of the PCB's. More information is needed about the presence and extent of PCB's in these products.

Partner Organizations: Department of Ecology The Lands Council

Potential Funding Sources: Department of Ecology Environmental Protection Agency Foundation Grants

Appendix C

Implementation: Strategic Actions

What programmatic actions are needed to achieve reductions of PCB and dioxins to the river?

C1. Facilitation of the Spokane River Regional Toxics Task Force

Problem Statement: The Spokane River Regional Toxics Task Force is an organization that is administered under a Memorandum of Agreement. A diverse set of organizations participate on the Task Force. Organizations that have a water discharge permit to the river are required to participate in the Task Force. Resources are needed to facilitate the meetings and activities of the organization, maintain communications, document Task Force activities, and maintain the public website.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Other Regulatory Agencies (SDOH, DOT, etc.) Conservation Groups

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

C2. Evaluation of Regulatory Barriers to PCB Source Reduction

Problem Statement: PCB is regulated by a variety of agencies with differing and conflicting regulatory standards. Some regulatory standards at the state and federal level are not as stringent as the water quality standards. As a result, they can be barriers to achieving source reduction. Efforts are needed to identify and remove these barriers.

Partner Organizations: Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Potential funding sources: Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Conservations Groups Business and Industry

C3. Agency Messaging

Problem Statement: State and federal agencies play an important role in the public message surrounding PCB. The manner in which PCB is presented on many websites does not include the topic of inadvertently produced PCB. As a result, the misleading message is that PCB is a "legacy" pollutant that results from the mismanagement of PCB wastes. A concerted effort is needed to modify the public information.

Partner Organizations: Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Related Activities: A9,C4, D1

C4. Education and Outreach

Problem Statement: PCBs are ubiquitous in the environment. Education and outreach is needed to inform consumers about the presence of PCB in products that are used and disposed of in the watershed. A variety of education and outreach tools can be created depending on the desired message and target audience: health education, consumer education, etc. Education and outreach tools could include brochures, workshops, videos, TV commercials.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Health Departments Potential funding sources: City of Spokane and Spokane River Stewardship Partners Department of Ecology: Section 319 Grants Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A9, C3, D1

C5. Integrated Clean Water Planning

Problem Statement: The reduction of sources of PCB should be in concert with local watershed planning efforts. Best Management Practices and engineering solutions need to be incorporated into integrated watershed plans.

Partner Organizations: City of Spokane Washington and Idaho Municipal Dischargers and Stormwater Agencies Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: City of Spokane Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: B5

C6. Align PCB Standards between Environmental Programs

Problem Statement: PCB in the environment is regulated by a variety of regulatory programs, all with a specific set of PCB standards. Different methodologies are used to detect PCB in the forms of Aroclors, homologs, and congeners. These methodologies are then used to interpret compliance with PCB requirements. A better understanding is needed of PCB standards and program-specific methodologies and how they relate to the water quality goal for the Spokane River.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A2, A5, A6

Appendix D

Implementation: Watershed Actions.

What actions can be taken that will reduce PCB and dioxin inputs to the Spokane River that will also be effective in other watersheds?

D1. Consumer Choice Education and Labeling

Problem Statement: Most consumers are not aware that PCB-containing products are still sold and routinely used. In addition, most consumers are unaware of the impact their purchasing decisions have on the environment, in particular the Spokane River. The current regulations for managing PCB under the Toxic Substances Control Act and the solid waste regulations are inadequate at protecting the river and those relying on the fish in the river. The most effective way to control PCB pollution is to reduce the inputs of PCB at the source. Unless steps are taken to reduce PCB at the source, the economy of the local region could be impacted by expensive end-of-pipe treatments for municipal facilities and loss of economic competitiveness for local recycling businesses. Consumer awareness and market incentives can be created through the development of a "PCB Free" label program that can be adopted for use within the watershed.

Partner Organizations:

Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners (education) Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A9, C3, C4

D2. Green Purchasing: Agency Programs

Problem Statement Since government purchasing represents 20% of Gross Domestic Product and multiyear contracts, government bidding processes are a great opportunity to push manufacturers and vendors to provide safer products and disclose product ingredients. This demand for green products can lead to better pricing and supply. For example, government purchasing has driven down the price of 100% recycled content office paper significantly. Green purchasing (EPP), also known as environmentally preferable or sustainable purchasing, is the procurement of goods and services that cause less harm to humans and the environment than competing goods and services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance or disposal of the product or service.

Work is needed to

- 1) Identify PCB-free purchase options
- 2) Educate agency and program buyers

Incorporate PCB-free products into green purchasing programs.

Partner Organizations: Department of Ecology

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A8, A9, C3, D1

D3. Toxic Substances Control Act Regulatory Reform

In 40 Code of Federal Regulations (CFR), Part 761.3, the regulation states that "inadvertently produced" PCBs may be present in a manufacture process at an average concentration of 25 ppm up to 50 ppm maximum. This amount is 781,250,000 times greater than EPA's Human Health Water Quality Criteria (HHWQC) of 64 pg/L (parts per quadrillion). Consumer products and other sources containing these allowable inadvertently produced PCBs are entering the environment through many different mechanisms (municipal wastewater, stormwater, paper recycling, ambient distribution and deposition). TSCA regulatory reform is needed to eliminate the production of products that could be contributing PCB to the environment.

Partner Organizations: Spokane River Stewardship Partners The Lands Council Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A8, A9, A10, A11, D4, D5, D4

D4. Green Chemistry: PCB Free Pigments

Problem Statement: Diaryl (yellow, red, orange) and phthalocyanine (green, blue) pigments can contain PCB as a manufacturing by-product. The production of yellow pigment alone results in 1.5 million tons a year of PCB being introduced to the global environment. Alternative methods of synthesis are needed to produce PCB-free pigments. The use of green chemistry principles are needed to avoid creating replacement chemicals that are also toxic.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Inland Empire Paper - Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: D3

D5. Elimination of PCB from Pigments

Problem Statement: The Environmental Protection Agency rules allow for PCB to be present as a inadvertently produced by-product of manufacture. Diaryl (yellow, red, orange) and phthalocyanine (green, blue) pigments can contain PCB. The production of pigments alone results PCB being introduced to the global environment. A regulatory incentive is needed to produce PCB-free pigments.

Partner Organizations: Inland Empire Paper Co. - Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Other stakeholder organizations Chemical/Pigment Manufacturers Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Chemical/Pigment Manufacturers (In kind to find PCB-free alternatives)

Related Activities: D3, D5, D6

D6. Elimination of PCB from other sources

Problem Statement: The Environmental Protection Agency rules allow for PCB to be present as a inadvertently produced by-product of manufacture. In 1982, the EPA identified that there are more than 200 industrial processes that produce PCB. EPA's information from that era is in summary format with little detail as to how and where these products are produced, what the residual PCBs are, and whether they are introduced to the environment through normal use. More research is needed to identify former, current, and potential future sources of inadvertently produced PCBs, their use and fate in the environment.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Other stakeholder organizations Chemical/Pigment Manufacturers

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Chemical/Pigment Manufacturers

Related Activities: A8, A9, A10, A11, D4, D3, D6, D5

D7. Align Analytical Methodologies

Problem Statement: There are a variety of analytical methodologies that can be used to measure PCBs in the environment. Different methodologies have different uses for the purposes of detecting PCBs in the forms of Aroclors, homologs, and congeners. A better understanding is needed of these methods, and how they relate to the water quality goal for the Spokane River.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: C2, D8, A2, A5, A6

D8. Align PCB Standards between Environmental Programs

Problem Statement: PCB in the environment is regulated by a variety of regulatory programs, all with a specific set of PCB standards. Different methodologies are used to detect PCB in the forms of Aroclors, homologs, and congeners. These methodologies are then used to interpret compliance with PCB requirements. A better understanding is needed of PCB standards and program-specific methodologies and how they relate to the water quality goal for the Spokane River.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: C2, D8, A2, A5, A6

D9. Identify Potential Research for Stormwater Abatement/Treatment Technologies

Problem Statement: Industrial and municipal stormwater require treatment to remove PCB. Research is needed to identify cost effective stormwater abatement and treatment technologies.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Responsible Source Contributors Academia Scientific and Trade Organizations Water Environment Federation

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions Water Environment Research Foundation Grants

Related Activities: C5, B5

D10. Identify Potential Research for Wastewater Treatment/Abatement Technologies

Problem Statement: Industrial and municipal wastewater require treatment to remove PCB. Research is needed to identify cost effective stormwater abatement and treatment technologies.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Responsible Source Contributors Academia Scientific and Trade Organizations Water Environment Federation

Potential funding sources: Spokane River Stewardship Partners Department of Ecology Environmental Protection Agency Water Environment Research Foundation Grants Partner Organization in-kind contributions

Related Activities: C5, B6

Appendix E

Assessment of Progress

What activities will be performed to assess the progress of toxics reductions?

E1. Environmental Assessment and Toxics Monitoring

Problem Statement: Ongoing Environmental Assessment and toxics monitoring is needed to assess the quality of the water in the Spokane River and the progress made in toxics reduction.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency Other stakeholders

Potential funding sources: Department of Ecology Environmental Protection Agency Partner Organization in-kind contributions

Related Activities: A2, A3, A7, A4, A5, A6

E2. Toxics Management Plans: Implementation

Problem Statement: Organizations that hold wastewater permits for the Spokane River are required to prepare and implement Toxics Management Plans. The plans are one tool in the overall strategy to achieve the water quality goals. The Toxics Management Plans identify specific actions that can be taken by the permit holders to identify the sources of PCBs in the wastewater systems, and potentially to reduce toxics to the Spokane River. These actions may be done by individual organizations or collaboratively as part of the Task Force efforts.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Partner Organization in-kind contributions

Related Activities: A9, A10, A11, B1, B4, B5, C2, C3, C4, C5, D1, D2, D6, D9, D10, E1

E3. Municipal and Industrial NPDES Wastewater Discharge Solutions

Problem Statement: Recognizing that end of pipe solutions are not technically possible today, such solutions are a piece of the equation which are needed to achieve the PCB water quality goal in the Spokane River. Organizations that have wastewater permits are required to install enhanced treatment technology to meet dissolved oxygen TMDL waste load allocations. These treatment technologies also have the benefit of reducing PCB concentrations in wastewater effluent.

Partner Organizations: Spokane River Stewardship Partners Department of Ecology Idaho Department of Environmental Quality Environmental Protection Agency

Potential funding sources: Spokane River Stewardship Partners Other stakeholders

Related Activities: D10