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OPPTS

The Spokane River Regional Toxics Task Force (Task Force) thanks EPA for meeting with us on June 17, 2013. EPA's regulatory role is an important factor in our ability to achieve the water quality standards for polychlorinated biphenyl (PCBs). Not only does PCB exceed water quality standards in several segments of the Spokane River, this is also a national issue. There are almost 5600 water bodies in the United States that are listed for PCB [insert reference] and more than 1,000 fish advisories for PCBs in 40 states [insert reference]. PCB-contaminated fish are the primary source of PCBs for people in the United States [insert reference]. PCBs still pose a real threat to human health and the environment [insert reference].

Of particular concern are the findings that PCB-11, a congener specific to diaryl pigments, has been found in places such as [insert list LA, NY, NJ, TX, etc.]. In addition to this, a recent survey by [Insert Japanese reference] shows that imported pigments can contain PCB in levels exceeding the EPA limits of 25 ppm average/50 ppm maximum for inadvertently generated PCB. In once case, the level of PCB in the pigment product was as high as 2000 ppm [insert reference].

EPA's TSCA monitoring enforcement strategy [insert reference] focuses on legacy facilities but also supports actions that are of national benefit. The Task Force encourages EPA to consider a TSCA compliance monitoring program that addresses the manufacture and import of pigments into the United States. Because stormwater is a significant contributor to PCB in the Spokane River, we also believe that doing this is also in accordance with the current National Enforcement Initiative of "Keeping Raw Sewage and Contaminated Stormwater Out of Our Nation's Waters" [insert reference]

Thank you once again for taking the time to meet with you. We look forward to hearing from you about our request.

Sincerely

Spokane River Regional Toxics Task Force

COMMENT FROM DOUG KRAPAS: My only comment is that you ask for enforcement of the current TSCA limitations, but you do not ask for a reform to TSCA regulations to address the inadvertently produced PCBs. In my opinion this is the most important issue, not the enforcement of current regulations. If we do not affect change to the regulations now during this ANPRM, we will not see any change to this TSCA regulation during our lifetimes and it is doubtful that we will ever be able to attain the WQS. All of our work thus far has been aimed at TSCA reform, so this should come of no surprise to EPA.