# Organized by Pollution Prevention Hierarchy

**Don’t make it**

* TSCA Regulatory Reform
  + Lower 50 ppm threshold for “non-PCB”
  + Lower thresholds for allowable PCB in inadvertently produced PCB
* FDA Regulatory Reform
  + Lower allowable limit in fish feed
  + Lower allowable limits in food packaging
* Support green chemistry initiatives to find alternatives to PCB containing pigments
* Work with manufacturers to eliminate inadvertent PCB from state contract products
  + Hydroseed
  + Road paint
  + Paints
  + Other as identified by consumer product testing (Cleaning products?)
* Promote chemical safety congressional reform
  + Producer responsibility for waste disposal
  + Design for the environment
* Provide tax incentives and grants for improvements that reduce toxic threats and for development of safer chemical alternatives.

**Don’t use it**

* TSCA Regulatory Reform
  + Regulate use of inadvertently produced PCB (i.e., limit use of PCB-containing pigment to specialty uses with minimal to know impact to the environment)
* FDA Reform
  + Prohibit use of inadvertently produced PCBs in food packaging materials

**Use less of it**

* Construction materials labeling ordinance, similar to the SRCAA Asbestos labeling ordinance
* Ecology Chemical Action Plan
* Implement recommendations
* Shared media and branding materials like the “Puget Sound Starts Here” program: <http://www.pugetsoundstartshere.org/>
  + “Fix Leaks” program for cars/boats to eliminate exposure from PCB in oils: <http://www.ecy.wa.gov/fixcarleaks.html>
  + Boat pump out station: <http://pumpoutwashington.org/>
  + Go natural in your yard: <http://www.pugetsoundstartshere.org/tips/try-going-natural-in-your-yard/#.Vv2vEU32ano>
  + Washington Waters pledge <https://fortress.wa.gov/ecy/waterspledge/WatersPledge.aspx>
  + Spokane River Forum Envirostars: <http://spokaneriver.net/category/envirostars/>
  + Toxics free tips: <http://www.ecy.wa.gov/toxicfreetips/>
  + Business assistance to use less toxics: TREE <http://www.ecy.wa.gov/tree/mediaWW.html> and LEAN <http://www.ecy.wa.gov/programs/hwtr/lean/>
  + Hazardous Substance information: <http://www.ecy.wa.gov/hsieo/index.html>
  + Student education: <http://www.ecy.wa.gov/HazardsontheHomefront/>
* Health information and fish advisories
* Consumer choice program
  + Continue product testing activities to identify products containing PCB and maintain information in public access database.
  + Promote eco-certification programs for consumer products that do not contain priority toxics
* Encourage “PCB-free” purchasing regulations, ordinances, and policies by governments and businesses in the watershed.

**Manage it properly**

* Understand pathways of sources to water
* Cross media actions:
  + Identify and use cross-media regulatory tools to the extent possible: MTCA clean up, solid waste disposal, recycling programs, air toxics
  + Modify cross-media regulatory tools to the extent possible.
* Identify and remove potential sources (i.e., historic electrical equipment)
* Hazardous waste inspections and technical assistance
* Increase TSCA inspections and enforcement
  + PCBs in pigments
* Manage stormwater
  + Erosion controls
    - Riparian restoration and enhancement
    - Sediment and erosion control BMPs
  + Manage stormwater onsite
  + Isolate source from stormwater system
  + Storm drain marking
  + Catch basin maintenance
* City of Spokane Integrated Water Plan

**Dispose of it properly**

* Manage and monitor former and current legacy spills
  + Donkey Island
  + Upriver Dam
  + Kaiser Aluminum
  + City Parcel
  + General Electric
  + Spill response
* Identify sources
  + Identify buildings which, due to age, potentially contain PCB in building materials and caulks
    - State and local government
    - Schools
    - Other
* Develop management standards for removal and disposal of legacy PCBs in building materials.
* Pass local ordinances with management standards for identification, management, and disposal of PCB containing building materials during remodel and demolition.
* Land use/development ordinances/standards that encourage LID and decrease impervious surfaces.

**Treat at end of pipe**

* Permit requirements
* Permittee Toxics Management Plans
* Identify new treatment technologies, such as fungi, biochar
* Install membrane technology on treatment plants
* Fish removal (i.e., carp)

# SAME AS ABOVE REORGANIZED BY TOPIC

**Regulation**

* TSCA Regulatory Reform
  + Lower 50 ppm threshold for “non-PCB”
  + Lower thresholds for allowable PCB in inadvertently produced PCB
* FDA Regulatory Reform
  + Lower allowable limit in fish feed
  + Lower allowable limits in food packaging
* TSCA Regulatory Reform
  + Regulate use of inadvertently produced PCB (i.e., limit use of PCB-containing pigment to specialty uses with minimal to know impact to the environment)
* FDA Reform
  + Prohibit use of inadvertently produced PCBs in food packaging materials
* Construction materials labeling ordinance, similar to the SRCAA Asbestos labeling ordinance
* Cross media actions:
  + Identify and use cross-media regulatory tools to the extent possible: MTCA clean up, solid waste disposal, recycling programs, air toxics
  + Modify cross-media regulatory tools to the extent possible.
* Ecology Chemical Action Plan
  + Implement recommendations
* Pass local ordinances with management standards for identification, management, and disposal of PCB containing building materials during remodel and demolition.
* Hazardous waste inspections and technical assistance
* Increase TSCA inspections and enforcement
  + PCBs in pigments
* Promote chemical safety congressional reform
  + Producer responsibility for waste disposal
  + Design for the environment
* Land use/development ordinances/standards that encourage LID and decrease impervious surfaces.
* Provide tax incentives and grants for improvements that reduce toxic threats and for development of safer chemical alternatives.

**Education**

* Shared media and branding materials like the “Puget Sound Starts Here” program: <http://www.pugetsoundstartshere.org/>
  + “Fix Leaks” program for cars/boats to eliminate exposure from PCB in oils: <http://www.ecy.wa.gov/fixcarleaks.html>
  + Boat pump out station: <http://pumpoutwashington.org/>
  + Go natural in your yard: <http://www.pugetsoundstartshere.org/tips/try-going-natural-in-your-yard/#.Vv2vEU32ano>
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  + Business assistance to use less toxics: TREE <http://www.ecy.wa.gov/tree/mediaWW.html> and LEAN <http://www.ecy.wa.gov/programs/hwtr/lean/>
  + Hazardous Substance information: <http://www.ecy.wa.gov/hsieo/index.html>
  + Student education: <http://www.ecy.wa.gov/HazardsontheHomefront/>
* Health information and fish advisories
* Consumer choice program
  + Continue product testing activities to identify products containing PCB and maintain information in public access database.
  + Promote eco-certification programs for consumer products that do not contain priority toxics
* Encourage “PCB-free” purchasing regulations, ordinances, and policies by governments and businesses in the watershed.

**Understand the watershed**

* Identify sources
  + Identify buildings which, due to age, potentially contain PCB in building materials and caulks
    - State and local government
    - Schools
    - Other
* Understand pathways of sources to water

**Research**

* Support green chemistry initiatives to find alternatives to PCB containing pigments
* Identify new treatment technologies, such as fungi, biochar

**Best Management Practices**

* Manage and monitor former and current legacy spills
  + Donkey Island
  + Upriver Dam
  + Kaiser Aluminum
  + City Parcel
  + General Electric
* Install membrane technology on treatment plants
* Develop management standards for removal and disposal of legacy PCBs in building materials.
* Identify and remove potential sources (i.e., historic electrical equipment)
* Fish removal (i.e., carp)
* Work with manufacturers to eliminate inadvertent PCB from state contract products
  + Hydroseed
  + Road paint
  + Paints
  + Other as identified by consumer product testing (Cleaning products?)

**Manage discharges**

* Permit requirements
  + NPDES
  + Stormwater MS4, CSO, Adaptive Management Plan actions
* Permittee Toxics Management Plans
* City of Spokane Integrated Water Plan
* Manage stormwater
  + Erosion controls
    - Riparian restoration and enhancement
    - Sediment and erosion control BMPs
  + Manage stormwater onsite
  + Isolate source from stormwater system
  + Storm drain marking
  + Catch basin maintenance

References:

*PCB Chemical Action Plan* at https://fortress.wa.gov/ecy/publications/SummaryPages/1507002.html

*Roadmap for Advancing Green Chemistry in Washington State:* https://fortress.wa.gov/ecy/publications/documents/1204009.pdf

*Spokane River Toxics Reduction Strategy* at <https://fortress.wa.gov/ecy/publications/documents/1110038.pdf>

*Toxics Reduction Advisory Committee Findings and Recommendations* at <https://fortress.wa.gov/ecy/publications/SummaryPages/0804029.html>

Spokane Regional Clean Air: <https://www.spokanecleanair.org/asbestos/washingtons-asbestos-labeling-law>