

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>

Commented [KW1]: From Adriane Borgias:

Dave,

Here are my comments on the BMP memo.

Mostly I concur with the comments submitted so far.

Attached is a list of actions that I have collected over the years, some of which are appropriately considered to be BMPs (or whatever they are to be called in the future).

There are two lists . . . the same items but organized in different "buckets."

References provided that may also be helpful.

Thanks,

Adriane Borgias

- 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”
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- FDA Regulatory Reform
 - Lower allowable limit in fish feed
 - Lower allowable limits in food packaging
- TSCA Regulatory Reform
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- 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>
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 - 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>