**SRRTTF TSCA Workgroup**

**October 5, 2016**

**Attendees:**

**Doug Krapas, Inland Empire Paper**

**Eric Williams, Gallatin Group**

**Adrianne Pearson, City of Spokane**

**Lisa Dally Wilson, Dally Environmental representing SRSP**

1. **DK summarized past actions, including actions preceding the Task Force: ECOS resolution, letters to EPA about TSCA and inadvertently produced PCB, and EPA response to Task Force letter.**

**ACTION ITEM: Follow up with EPA on status of PCB-11 studies.**

**FOLLOW UP: APB spoke with Peter Gimlin at EPA HQ. There is a toxicology study on PCB-11, it has been started and undergoing a screen analysis so they can set the parameters for the study. The schedule is not known but expect 1-3 years before there are any results. The results of this study would go to the EPA risk assessors and a preliminary RA would be done based on exposure models and a screening determination made as to whether the level of concern is high enough to warrant regulatory action. Was not sure if the study included both noncancerous and cancerous effects, but he thought it did.**

**If “yes” then some sort of regulatory action would follow. If “no” then there would be no further TSCA action. TSCA would evaluate risk based on “highest” exposure, which could be fish consumption exposure and also dermal exposure. (This is more refined than the way the risk assessment was done in the early 80’s where spills and dermal exposure where the primary areas of concern. Also exposure via food was addressed through management requirements and also the FDA limits. )**

**Not sure of the differences between the Water Program and TSCA program risk assessment methodologies other than the water quality standards which were not congener specific. The basic issue (which is still true) is that there in not enough tox data on individual PCB congeners.**

1. **EPA Regulatory Rulemakings**
   1. **Status of Lautenberg Act and Impact on Regulatory Activities: EPA has an 18 month period to establish new regulations for prioritizing and acting on toxic chemical. Holly Davies with Ecology sits on the Chemical Safety Advisory Committee.**
   2. **Status of Reassessment of Use Authorizations: The EPA docket has the Riverkeeper/IEP letter and the CPMA response. DK has been talking with the CPMA and they participated in the ACS Green Chemistry conference in a session organized by Ecology (Ken Zarker and others) Link to papers:** <https://presentations.acs.org/common/presentations.aspx/GCE2016/GC--E/GCE25a>

**FOLLOW UP: The 2010 Reassessment of Use Authorizations ANPR is expected to be issued as a proposed rule before the end of the year. The rulemaking has been split into four parts: fluorescent light ballasts, other electrical equipment, pipeline liquids, and porous surfaces (i.e., concrete pad contaminated by a PCB spill). The first proposed rule will be on fluorescent light ballasts.**

1. **Path forward and Action Items**

**Review of list of potential topics for consideration. The group determined that a focused letter would be most effective. Identified a topic of interest (economic evaluation) and found a number of related issues to that topic. Items of higher interest include:**

* **Economic evaluation and the cost burden associated with end of pipe treatment**
* **Relationship of TSCA regulations with the CWA requirements**
* **Address and lower the 50 ppm TSCA allowances, phase out products with inadvertently produced PCBs (especially use in open environment). Ozone Depleting Substance ban is an example of how this can work.**

**Possible outline:**

* **TSCA and WQ lead-in**
* **Focus on pollution prevention (don’t make vs. treat or clean up later)**
* **Economic consequences of end-of-pipe treatment; and challenges of meeting end of pipe standards**
* **Magnitude of the problem: miles of rivers and streams listed for PCB; number of PCB TMDLs; number of successfully implemented PCB TMDLs resulting in achieving water quality standards (zero).**
* **Impact of PCBs on Environmental Justice communities**
* **Suggest alternatives (alternative processes as an end goal to reducing PCB inputs to the environment)**

**Path forward**

* **Collect ideas, frame the “ask”**
* **Prepare draft (Nov 15th)**
* **Reconvene; reframe the “ask”; revise draft**
* **SRRTTF prepares correspondence**
* **Link message with other groups (congressional, national tribal toxics work group, SFEI, DRBC, Michigan, ECOS, ACWA, others?**