

National iPCB Outreach & Toolkit Proposal by The Lands Council

The Spokane River continues to exceed water quality limits for polychlorinated biphenyls (PCB's), which ultimately bio-accumulate in fish, and pose health hazards when the fish are consumed. The Lands Council would like to move a national campaign forward to update TSCA (Toxic Substances Control Act) to reduce the limits of inadvertent PCB's that are allowed in products such as paints, inks and pigments, in order to improve water quality in the Spokane River and other water bodies. We want to inform supply chain and communities across the country that PCB's are still being produced inadvertently "iPCBs" under certain processes that have chlorine and high temperatures present.

PCB's from ink and pigments are making their way into the river from point sources, such as Inland Empire Paper (IEP), and wastewater treatment plants, as well as non-point sources such as stormwater. As legacy PCB's are being cleaned up, and slowly declining, iPCB's will become a larger percentage of the total PCB's. Since water quality standards are not being met, and iPCB's are contributing to exceedences, it makes sense to reduce the input of iPCB's in products that eventually enter the river. While it may appear that PCB-11 is not appreciably bioaccumulating in Spokane River fish tissue, there are many other congeners associated with iPCB's that are.

Spokane, in large part due to the Task Force, is a leader in raising the issue of iPCB's in the country. As more municipalities are facing challenges in meeting water quality standards (such as Roanoke), there is a need to create a national effort to reduce iPCB's in products. The Task Force's experience at hosting the iPCB workshop, as well as the ECOS resolution makes us a logical choice. Our unique collaborative Task Force positions us to consider the interests of diverse parties, including the ink and pigment manufacturing supply chain. Working together, we can find ways to reduce the iPCB's entering the Spokane River.

In regards to the contribution of iPCBs to the Spokane River, as stated above, IEP, wastewater treatment plants, and non-point sources such as stormwater are contributing iPCBs to the watershed. These sources are not originating locally but from many diverse sources. For example, IEP recycles paper from distances as far as 1500 miles from Spokane, including the U.S. and Canada. Therefore a national, if not international solution is needed to reduce PCB sources to the Spokane River. Even with the most advanced treatment available (UF membranes) it appears that IEP's discharge will be well above even the current standard of 170 pg/L. The TSCA allowable limit in products (50 ppm) is 294 million times more than WA State's current water quality standard (170 ppq).

Scope of Work

- (1) Active outreach to community leaders, city municipalities, stormwater and wastewater treatment facilities, health departments, state water quality agencies, Universities, iPCB supply chains and product manufacturers. We will compile a spreadsheet of potentially interested parties (municipalities and states with fish advisories, tribes, health districts, etc.)
- (2) Attend and communicate our goals to the Sustainable Packaging Coalition.

- (3) Creating and providing these entities with a toolkit with the tools and support to build public awareness, educate the supply chain, and join with a national effort to reduce allowable TSCA limits for iPCB's.

Task 1: Outreach and information sharing

Active outreach to community leaders, city municipalities, cities with fish advisories, stormwater and wastewater treatment facilities, state water quality agencies, Universities, iPCB supply chains, and NGOS.

Contacts

- (1) Compile a contact list of communities that are addressing PBC challenges and find contacts in those places like community leaders, agencies and communities with Fish Advisories, contacts for wastewater and stormwater treatment managers, IPCB supply chains, etc.
- (2) Identify any other contacts SRRTTF members and associates could provide

Partners

Current partners:

Our current partners include: TSCA SRRTTF group, Kyle Shimabuku and Gonzaga University, WA Department of Ecology, Roanoke River Conference attendees, Chesapeake Bay agencies, Dr. Lisa Rodenberg of Rutgers University.

Target Partners:

Other Potential partners include; Large scale businesses, such as Apple, Amazon, HP, Costco; Tribes (after gaining support from Spokane Tribe); health districts, the Sustainable Packaging Coalition, congressional committees; wastewater treatment plants and operators; cities with fish advisories; NGO's, universities; Department of Transportation's (for stormwater); paper production facilities; print media; and other targets as the committee suggests.

Outreach Strategy:

- For each outreach target, we will tailor our outreach and source creating a list of in-roads counters to those entities
- I.E. IEP reaches out to paper companies, Health District reaches out to other health districts. USING the toolkit

Tiered priorities:

- The cities and agencies that are already aware and working on PCB's will be our top priority, if we wish to expand this
- We will establish a medium tier consisting of those we have received a positive or at least an interested response.

Communication with identified organizations:

- 1- Once contacts have been established, strategically reach out to entities to discuss possible solutions and ask them to help reform TSCA to lower the limit allowed in products such as paint, ink and pigments.
- 2- Reach out to ECOS again (Environmental Council of the Stated) to update our contacts and ask for action for the Resolution that was passed in 2012.
- 3- Reach out to other wastewater and stormwater treatment facilities and state agencies to inform them of our campaign and seek support.
- 4- Attend Sustainable Products Coalition and River Rally conferences.
- 5- Provide the tools and campaign templates to build public awareness, educate the supply chain and take action locally
- 6- Phase Two will be to provide leadership and support for these entities to enact these campaigns
- 7- It will be communicated that the purpose and structure of the national campaign is still being defined, but it will be developed to:
 - Support SRRTTF's mission to (i) identify potential sources of PCBs, including PCBs found in products, (ii) prevent PCBs from entering the Spokane River and (iii) bring the Spokane River into compliance with water quality standards
 - Support efforts to educate the public on the presence of PCBs in products
 - Support SRRTTF's desire to address the discrepancy between TSCA regulations and water quality standards

Partner with entities interested in lowering PCB levels in products.

- HP and Apple were examples of companies who voluntarily reduced their limits. If the TSCA limits were revised, there would be a timeline and process for enforcement.
- Gonzaga U. will help the Task Force to understand whether the procurement limits set by HP or Apple are effective. The scope of the products that they apply to needs to be better understood as well as how they are being enforced along with the mechanisms being used to demonstrate compliance.

Goals for Industry Partners:

- Educate supply chain
- Set Attainable Goals for Industry (Market Driven)
- Reduction in Packaging and Graphic Printing
- Change in market demand for color
- Increase Public Awareness (Create Consumer Pressure)
- Environmental Incentives resulting in "de-selection"
- Media Opportunities

- Social media outreach by large corporations to brand themselves “sustainable” target circular economy

Task 2: Create a Toolkit

Create and provide these entities with the **tools and support** to build public awareness, educate the supply chain, and join with a national effort to reduce allowable limits of PCB's in products.

Goals of toolkit:

- Support our targeted partners in their efforts to campaign to lower TSCA limits on PCBs in paints, pigments and inks.
- Provide campaign framework and the building blocks for leaders and municipalities to launch a campaign that fits their community.
- Provide educational materials for all outreach targets

What is in the Toolkit

- Website for centralized information and materials
- Educational materials and resources to be absorbed or shared
 - Materials for both public and supply chain.
- Solutions and implementation (ie paths to reform TSCA limits).
- Public awareness campaign tools such as social media graphics and content, and online petitions for citizens to sign and share.
- Database and testing result sharing and information gathering.
- Success stories and case studies ie Spokane

Deliverables

We will maintain a spreadsheet of contacts with contact information, title and profession, level of involvement and any important notes. For each target area ie city or a municipality we will have a brief overview and background on their history with PCB's and how they are currently addressing the issues. The toolkit and the tools on it will be housed and accessible from a central website. That website will have information collected and organized for the interested party to find, use and share. We will provide analytic reports from the toolkit website showing where and when the site was used, as well as most used pages and tools. This information will help us make any changes or additions to the toolkit. These reports will be shared with the SRTTF.

The longterm measurement of success is a reduction in PCB's entering the river. Shorter term steps in meeting that strategy is working with entities across the country to inform and work to change TSCA limits. For example if printer inks were found or developed that had much lower levels of PCB's, that would be a measurable success toward reducing discharges to the river.

Schedule

The Lands Council will start on this scope of work after being notified to proceed. The project schedule will span a period of one year. Once the project begins, updates can be provided to the SRRTF- TSCA/iPCB Workgroup as needed. At the end of one year period, we will prepare a progress report and recommendations for continued efforts.

Budget

Task Description	Hours	Rate	Total
Initial outreach and contact list building	120	40/ hr	\$ 4,800.00
Toolkit development and website updates	160	40/ hr	\$ 6,400.00
Follow up calls and ongoing outreach with partners and contacts	180	40/ hr	\$ 7,200.00
Lands Council team meetings	40	40/ hr	\$ 1,600.00
Reporting and analytics to SRRTTF	20	40/ hr	\$ 800.00
Sustainable Packaging Coalition/River Rally conferences			\$ 800.00
Contract with Kyle Shimabuku and Gonzaga			\$ 5,000.00
Total Budget			\$ 26,600.00