

October 27, 2021

Michelle Pirzadeh  
Acting Regional Administrator  
EPA Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Dear Administrator Pirzadeh:

This letter is sent on behalf of the Spokane River Regional Toxics Task Force (Task Force) requesting a status update to the US Environmental Protection Agency (EPA's) commitment to develop additional health assessment data for certain Polychlorinated Biphenyl (PCB) congeners and Aroclors. The Task Force represents municipal and industrial dischargers, conservation and environmental interests, and state and federal regulatory agencies. The purpose of the Task Force is to "work collaboratively to characterize the sources of toxics in the Spokane River and identify and implement appropriate actions needed to make measurable progress towards meeting applicable water quality standards for the State of Washington, State of Idaho, and The Spokane Tribe of Indians and in the interests of public and environmental health."

In a letter dated February 24, 2015, from then Region 10 Director Dennis McLerran (Attachment 1), the EPA made a commitment to the Task Force to perform toxicity testing on congener PCB-11, specifically stating:

*Revising current regulations to reduce Inadvertently generated PCBs presents both policy and scientific challenges. Before proposing more stringent regulations on the inadvertent generation of PCBs in pigments, the EPA would seek to further understand the complexities and contributions of not only PCB-11, but also other congeners that may be present in the Spokane River. At present, there are not sufficient data to assess such PCB congeners. However, in a step toward addressing this deficiency, the EPA has requested that toxicity testing on PCB-11, a congener identified to be incorporated into yellow pigments, be conducted through the National Toxicology Program at the National Institute of Environmental Health Sciences.*

On May 9, 2018, the Task Force sent a letter to Chris Hladick, Region 10 Administrator at that time, with a request for EPA to provide an update on the status of the toxicity testing on PCB 11

(Attachment 2).

In September 2018, Mr. Hladick replied with a letter to the Task Force (Attachment 3) stating that EPA was working to develop additional data, as excerpted from the EPA letter:

- *“The National Toxicology Program (NTP) is evaluating PCB 11 for potential toxicity with emphasis on the similarities and differences between PCB 11 and other PCB congeners. The study includes the following PCB congeners:*
  - o *PCB 126, a PCB with known "dioxin-like" activity;*
  - o *PCB 153, a PCB that is persistent but does not cause effects like dioxin;*
  - o *PCB 95, a PCB with neurotoxic activity;*
  - o *Aroclor 1254 and Aroclor 1016, two commercial mixtures that were used heavily in the past, and which contain mixtures of "dioxin-like" and "non-dioxin-like" PCB congeners.*
- *The NTP is also evaluating the effects of PCB 11 in a human liver cell line measuring cell viability and changes in RNA expression.*

*These studies will indicate whether PCB 11 has activity similar with other PCB congeners tested and/or to the Aroclor mixtures and will help us better understand the nature of and relative importance of the hazards posed by PCB 11.”*

Since 2018, members of the Task Force have made periodic informal inquiries on the status of this work to EPA representatives, but no additional detailed information has yet been provided. Considering that this commitment by EPA is now approaching seven (7) years, the Task Force is now making this additional formal inquiry and would appreciate your timely response.

The Task Force thanks EPA for your interest in our community and the Spokane River. Since its inception the Task Force has used an inclusive approach to engage diverse interests and solve difficult problems. We look forward to working with you, and continued engagement with your staff at Region 10 and the EPA Office of Pollution Prevention and Toxics (OPPT) to implement positive change.

If you have any questions or require clarification, please contact Doug Krapas, Task Force iPCB/TSCA work group lead at 509-924-1911.

Respectfully Submitted,

The Spokane River Regional Toxics Task Force



cc with attachments (3):

Lucy Edmondson, Senior Advisor, Office of the Regional Administrator, Region 10, EPA  
Rick Keigwin, Deputy Assistant Administrator, Office of Chemical Safety and Pollution Prevention, EPA  
Laura Watson, Director, WA Dept. of Ecology  
Heather Bartlett, Water Quality Program Manager, WA Dept. of Ecology  
Brook Beeler, Eastern Regional Director, WA Dept. of Ecology