

## **AMERICAN COATINGS ASSOCIATION (ACA)**

**IPCB Free URL** – given that low levels of IPCBs are found in many products – it is nearly impossible to substantiate a claim of “IPCB free”, therefore we question using this URL.

- The url was approved by Doug Krapas and derived from [www.spokaneriverpcbfree.org](http://www.spokaneriverpcbfree.org).

“**Why are iPCBs harmful?**” implies that all iPCBs are as harmful as Aroclors, however iPCBs do not have the same chemical structure or same environmental or human health effects as Aroclors. ACA suggests the following change:

**Certain** PCBs are troublesome due to their persistence in the environment, ability to bioaccumulate up the food chain, and their toxicity they are found in even the most remote regions of the world due to global transport.

- Change accepted.

**IPCB Landing Page** – the statement “Inadvertent PCBs can be found in consumer products such as packaging, paper products, paints and colorants, caulks, printer inks, and more” needs to be revised. ACA suggests clarifying by including **certain** packaging, paper products, paint and colorants....

ACA also suggests mentioning other products identified by the City of Spokane that may contain iPCBs including motor oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap, and others.

- Change partially accepted. Statement now reads: Inadvertent PCBs can be found in **some** consumer products such as packaging, paper products, paints and colorants, caulks, printer inks, **motor oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap, and more.**

**PCB-11** – it is important that the website document that the Taskforce has found that PCB-11 does not appreciably bioaccumulate in fish or biofilm.

- Under review.

**Primary Sources** – it appears that the “primary” paint chip photo has been replaced – thank you for making this change.

“**What Can I Do**” – ACA suggests editing this sentence: “PCBs are found in both old and new products such as **certain** inks.... and add motor oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap.

- Infographic was copied from [www.spokaneriverpcbfree.org](http://www.spokaneriverpcbfree.org), which was already approved by SRRTF.
- Source: <http://spokaneriverpcbfree.org/education/printable-educational-materials/>

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## PRINTING UNITED ALLIANCE

**iPCBFree URL** - We find the use of the URL “iPCBfree” misleading and should be changed. The concept of a PCB free product, environment, or person is not possible. The prevalence of PCBs has made it impossible to claim that a material has zero PCBs, or it is “PCB Free”.

- The url was approved by Doug Krapas and derived from [www.spokaneriverpcbfree.org](http://www.spokaneriverpcbfree.org).

**Landing Page Comments** - Under the heading “Why are iPCBs harmful?”, there is an implied connection between iPCBs and the more harmful Aroclors. As we have indicated, not all PCBs have the same environmental or human health effects as Aroclors. The higher chlorinated congeners like those found in the Aroclors have long been recognized as being more hazardous. Absolute statements about all PCBs cannot be made when trying to educate the public. To provide more accurate information, the following modification to the current wording needs to be made with the addition of the word “Certain”.

**Certain** PCBs are troublesome due to their persistence in the environment, ability to bioaccumulate up the food chain, and their toxicity they are found in even the most remote regions of the world due to global transport.

- Change accepted.

The callout “Inadvertent PCBs can be found in consumer products such as packaging, paper products, paints and colorants, caulks, printer inks, and more.” needs to be revised. The site should reference other products that indicate a presence of iPCBs including motor oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap, and others as identified by the City of Spokane - See <http://srrttf.org/wp-content/uploads/2015/03/Revised-Product-Testing-Report-7-21-15.pdf> and those identified by the Department of Ecology at <https://apps.ecology.wa.gov/publications/documents/1604014.pdf> and <https://apps.ecology.wa.gov/publications/documents/1404035.pdf>.

- Change accepted. Statement now reads: Inadvertent PCBs can be found in **some** consumer products such as packaging, paper products, paints and colorants, caulks, printer inks, **motor**

**oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap, and more.**

And, most importantly, it must be noted, as we mentioned earlier, that iPCBs are not found in every product listed, only certain ones. In the case of printer inks, iPCBs are only present in certain pigments and not all pigments used to formulate ink. Therefore, not all inks will contain iPCBs. Again, the statement as currently structured provides misleading information.

- Statement now reads: Inadvertent PCBs can be found in **some** consumer products such as packaging, paper products, paints and colorants, caulks, printer inks, **motor oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap, and more.**

It is also not clear what is meant by the term “paper products”. There are many types of paper products and if information is going to be presented about them, additional clarity is required. In addition, the testing data indicated that only one caulking product had elevated levels of PCBs in them and additional information regarding which type of caulking needs to be provided.

Again, we request that all references used to support the indication that products contain iPCBs be provided on the website.

“Inadvertent PCBs can be found in **certain** consumer products such as motor oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap, **some** packaging, paper products, paints and colorants, caulks, printer inks, and more.”

- Statement now reads: Inadvertent PCBs can be found in **some** consumer products such as packaging, paper products, paints and colorants, caulks, printer inks, **motor oil, transmission fluid, deicers, antifreeze, pesticides, laundry detergent, hand soap, and more.**
- Source: [http://srtrtf.org/wp-content/uploads/2019/06/4a-FinalDraft\\_iPCBs-and-Pigments.pdf](http://srtrtf.org/wp-content/uploads/2019/06/4a-FinalDraft_iPCBs-and-Pigments.pdf)
- Source: <http://srtrtf.org/wp-content/uploads/2019/07/NGC-inadvertant-PCB-White-Paper-for-SRRTTF-20181016.pdf>

**About iPCBs Page Comments** - As stated above, it is critically important that clear accurate information be provided, as well as references to studies used to substantiate claims. It must be formally recognized by this website that not all PCBs bioaccumulate. Based on studies issued by the SPRTF, the most predominant PCB in the Spokane River is PCB-11 which does not appreciably

bioaccumulate in fish or biofilm. We have acknowledged that PCB- 11 is found in certain pigments that get used to formulate certain printing inks. Again, it is not found in all pigments.

The toxicity for all PCBs has not been studied and while statements about the toxicity of Aroclors are accurate, Aroclors do not represent all PCBs, especially the lower molecular weight congeners such as PCB-11. In addition, there is a concentration threshold for those that have been studied in which negative health effects will most likely be experienced. This should be communicated as well as otherwise the web page will give rise to concern for those who are not familiar with a dose response relationship.

Inks and pigments are not the only source of iPCBs and should not be specially called out as the only examples. This should be deleted unless all products that contain iPCBs are identified. In addition, it is only certain inks and pigments that have iPCBs. The test data from Ecology found PCBs in shampoo, motor oil, and numerous other products and those need to all be identified. See the studies from the City of Spokane and Department of Ecology.

Additional details are needed to explain the statement "iPCBs are being produced under certain processes that have chlorine and high temperature present". What are these processes and references are required?

- Source: [https://docs.google.com/presentation/d/13TkJyLCouOD-\\_4iGDRUCiERf3EmL3I0IciJ9vJWYhA/edit#slide=id.g137bcf922\\_0\\_0](https://docs.google.com/presentation/d/13TkJyLCouOD-_4iGDRUCiERf3EmL3I0IciJ9vJWYhA/edit#slide=id.g137bcf922_0_0)

We request the following language revisions:

### **National iPCB Campaign**

The Spokane River continues to exceed water quality limits for polychlorinated biphenyls (PCBs), where some congeners can which ultimately bioaccumulates in fish and potentially pose health hazards when the fish are consumed. Therefore, we have created a national campaign to reduce the limits of inadvertent PCBs (iPCBs) that are allowed in products such as inks and pigments, in order to improve water quality in the Spokane River and other bodies of water. We seek to inform supply chain and communities across the country that iPCBs are being produced under certain processes that have chlorine and high temperatures present.

- Statement now reads: The Spokane River continues to exceed water quality limits for polychlorinated biphenyls (PCBs), which can bioaccumulate in fish and pose health hazards when the fish are consumed. Therefore, we have created a national campaign to reduce the limits of inadvertent PCBs (iPCBs) that are allowed in certain products, in order to improve

water quality in the Spokane River and other bodies of water. We seek to inform supply chain and communities across the country that iPCBs are being produced under certain processes that have chlorine and high temperatures present.

- Source: [https://docs.google.com/presentation/d/13TkJyLCouOD-\\_4iGDRUCiERf3EmL3I0IciJ9vJWYhA/edit#slide=id.ga137bcf922\\_0\\_0](https://docs.google.com/presentation/d/13TkJyLCouOD-_4iGDRUCiERf3EmL3I0IciJ9vJWYhA/edit#slide=id.ga137bcf922_0_0)

### **PCBs are not nice.**

Certain PCBs above specific concentrations can pose health hazards that can include:

- PCBs **can** pose health hazards that **may** include:

### **PCBs like to travel.**

As a consequence, they are found all over the world in all environments, in many products, and food.

- As a consequence, they are found all over the world **in many environments, products, and food.**

### **Where do iPCBs come from?**

Thank you for the modifications to this section. And, while the section was modified by providing a definition of “primary production sources” and “secondary production sources”, this section still requires significant revisions. In our May comments, it was requested that these concepts be deleted from the web page. The current presentation of these two topics is inaccurate. Use of the terms “primary” and “secondary” should be discontinued. “Primary” and “secondary” sources do not exist as only one source and that is when the iPCBs are created in the manufacturing process for the product.

Use of the term “production” is not accurate as it applies to secondary sources of iPCB. These sources do not produce iPCB as they are not manufacturing any product that results in the formation of iPCBs. They may be a source of iPCBs, but they are not producing them in the same way as “primary sources”.

Using a publisher as an example of a “secondary production source” is not an appropriate example. We request details as to why and how The Lands Council considers publishers to be a “secondary production source”.

- Source: <http://srrttf.org/wp-content/uploads/2019/07/NGC-inadvertant-PCB-White-Paper-for-SRRTTF-20181016.pdf>

As requested in our May comments, the image depicting paint chips needs to be replaced as it implicates all paints and only some paints can contain iPCBs. If an image is to be used, it should be

one showing pigments as certain pigments can be a source of iPCBs. If an image of pigments is used, then it needs to be accompanied by a statement that "Certain pigments can contain iPCBs".

- Source: <http://srrttf.org/wp-content/uploads/2019/07/NGC-inadvertant-PCB-White-Paper-for-SRRTTF-20181016.pdf>
- Picture updated

**Take Action Page Comments** - On the Take Action page, there is a heading Sign On that does not provide any context regarding improving the water quality in the Spokane River or other bodies of water. It is important to note that iPCBs are not the primary cause of impairment. The testing performed by the Task Force has clearly shown that the Spokane River's problem with impairment from PCBs is not from iPCBs, but legacy sources. The most recent data regarding PCBs and PCB-11, which is the most predominant PCB in the Spokane River, has a rather significant source that has yet to be identified and it is clear that it is not the known source of iPCBs from pigments to the river, which is the Inland Empire paper recycling operation.

**Sign On** - TSCA (Toxic Substances Control Act) needs to be amended to reduce the limits of inadvertent PCB's that are allowed in products, in order to improve water quality in the Spokane River and other water bodies.- Sign on to support stricter TSCA limits.

- I have asked for more context and language regarding revising TSCA/taking action.

**Industry Page** - Based on our reading of this page, the heading of "Industry" is not appropriate. These are not industry resources, nor are they representative of industry. It is not clear to us why the resources on this page are being provided. We request information on the purpose of resources listed and how they relate to the identification and reduction of iPCBs being discharged into the Spokane River or other waterways be provided. Unless this information can be provided, then they should be removed as they do not appear to be relevant.

- industry (noun) - a particular form or branch of economic or commercial activity. Similar: business.
- Industry Page was copied from [www.spokaneriverpcbfree.org](http://www.spokaneriverpcbfree.org), which was already approved by SRRTFF.
- Source: <http://spokaneriverpcbfree.org/education/info-for-businesses/>
- Source: <http://spokaneriverpcbfree.org/education/other-resources/>

**Education Page** - We have the same reservations with the language in this section that we have identified in other sections of the web page. Before the site moves forward, we request that this entire

page be revised to eliminate the broad and overly generalized statements and the language be changed so that it mirrors our earlier comments.

As mentioned earlier, the sentence that “PCBs are found in both old and new products such as inks, dyes, paper products, clothing, and paint” in the “What Can I Do” section needs to be modified as it is not accurate. Unless The Lands Council can provide a reference, the inclusion of dyes needs to be deleted. Most importantly, and as earlier referenced, not all inks, paper products, and paint contain iPCBs and broad terms such as “clothing” “paper products”, etc. need to be defined as the web page currently infers that all articles of clothing contain iPCBs. In addition, since the test results by the City of Spokane and Department of Ecology are limited, it is important to clearly communicate that not all products in a subcategory contain iPCBs. For example, some yellow sticky note test results showed products with PCBs and others fell below the detection limit, which means not all yellow sticky notes contain PCBs.

Identifying “dyes” as containing iPCBs needs to be justified with a reference. We are not aware of any studies indicating that dyes contain iPCBs and unless a reference can be provided, “dyes” needs to be removed from the list of examples.

In addition, it is a common misperception that dyes and pigments are one in the same and can be used interchangeably. This is not accurate as they are not the same and dyes are not used in commercial printing inks.

What is meant by the word “old”? Please provide some context to how it is to be interpreted as the use of the that word has many meanings. Does it mean used products, those manufactured during a certain time period, materials that have aged, etc.

The sentence needs to be revised to state:

PCBs are found in both old and new products such as **certain** inks, **dyes**, paper products, clothing, **motor oil, transmission fluid**, deicers, antifreeze, pesticides, laundry detergent, hand soap, and paint.

We also believe that the statements referencing the primary sources and secondary sources under the “Where Do They Come From” section also needs revision as indicated above in the “About PCBs” page comments.

In the “What Is Being Done” section, it states that “Scientists recommend pulling together stakeholders from the newsprint, and paper and paperboard packaging supply chain including users, recyclers and other disposers, and impacted communities, to develop unified procurement and substitution approaches and to identify the most critical ongoing research needs.”

It is not clear which “scientists” have made this recommendation. No reference is provided for this statement and since it is a rather definitive action item, a reference needs to be provided. We are not aware that this is an activity that has been discussed, promoted, or approved by the Spokane River Regional Task Force in a formal announcement, project, or any EPA workgroup that has been formed. Unless a reference can be provided, this statement needs to be deleted.

- Education Page was copied from [www.spokaneriverpcbfree.org](http://www.spokaneriverpcbfree.org), which was already approved by SRRTFF.
- Source: <http://spokaneriverpcbfree.org/education/printable-educational-materials/>
- Source: [http://srrttf.org/wp-content/uploads/2019/06/4a-FinalDraft\\_iPCBs-and-Pigments.pdf](http://srrttf.org/wp-content/uploads/2019/06/4a-FinalDraft_iPCBs-and-Pigments.pdf)

**“PCB Challenge” Infographic Comment** - In the “PCB Challenge” infographic, there is a statement under the “Did You Know?” heading that “Yellow Dyes Have Higher Concentrations of PCBs.” This is not an accurate statement as it is our understanding that dichlorobenzidine or its salts are not raw materials for any commercial dye, especially not yellow dyes. This statement lacks data supporting the finding that dyes are the source for iPCBs as we are not aware of any studies conducted to determine if dyes contain iPCBs. Please provide a reference that confirms dyes contain iPCBs.

Under the “What Can I Do” heading there is a statement to “Be a consumer advocate for plain packaging that uses less ink since a lot of common packaging contains PCBs due to inks and dyes.” This statement should be deleted. It is too broad, lacks specificity, and is misleading. The Lands Council needs to provide a definition of the term “common packaging” “inks” and as stated previously, dyes are not used in inks that are used in the manufacture of commercial packaging.

In addition, the testing conducted by Department of Ecology, City of Spokane, or EPA ([https://cfpub.epa.gov/si/si\\_public\\_file\\_download.cfm?p\\_download\\_id=538883&Lab=NRMRL](https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=538883&Lab=NRMRL)) is not comprehensive and represents a small sample of all packaging on the market so broad over generalized statements implicating all packaging is not appropriate. Plus, the test results indicate that not all the packaging tested contains iPCBs.

Under the “PCB Regulator Limits (in parts-per-million) heading”, there is an arrow pointing to the Federal Limits in Products line in the table of PCB regulatory limits that indicates 50 ppm with the following statement: “This is referred to as PCB Free”. We request that a reference be provided for this statement as we are not aware of any products where this statement is being used to market a product that includes a direct reference to EPA’s TSCA limit.



In addition, the entry in the table of the federal limit of 50 ppm also needs to be revised. The limit established by 40 CFR section 761.3 sets a concentration of iPCBs in products at an annual average of less than 25 parts per million (ppm), with a 50 ppm maximum. The federal limit means that it is illegal for a manufacturer of a covered product to sell products at a concentration greater than 50 ppm PCB.

The 25 ppm average applies to both suppliers and customers which means that the normal practice for suppliers would be to manage their products to ensure that they do not exceed 25 ppm as it protects their customers from potential violations. Therefore, the 50 ppm limit in the chart needs to be replaced with the specific limits in EPA's regulation.

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- Source: <http://spokanriverpcbfree.org/education/printable-educational-materials/>

**Municipalities Page Comments** - Many of the resources provided on this page are the same as the ones that appear on the "Industry" page. The same comment made for the "Industry" page would apply here as well.

In addition, it is not clear why several sustainability programs that are specific to Spokane based businesses are being identified. If this is a national campaign, these programs are not applicable to any organization not in the Spokane area and should be deleted.

- Municipality Page was copied from [www.spokanriverpcbfree.org](http://www.spokanriverpcbfree.org), which was already approved by SRRFFF.
- Source: <http://spokanriverpcbfree.org/education/info-for-businesses/>
- Source: <http://spokanriverpcbfree.org/education/other-resources/>

**Individual Page Comments** - We find similar statements on this page as on others that also need revision. In addition, the terms "plain packaging" and "less ink" as well as what caulking being referenced need to be defined. The language in the following sections needs to be revised as follows:

**Be a Consumer and an Advocate** - Individuals can advocate for the elimination of PCBs by no longer using products that contain them and by asking questions to find out which products contain PCBs. Because products are still allowed to contain PCBs, ask product suppliers if they know if their products contain PCBs. By bringing attention to the issue, corporations, suppliers, and manufacturers may feel pressure to evaluate their products. Product suppliers and employees will likely be unaware if their products contain PCBs, but it will still raise awareness.

- Ask the autobody shop if the oil is PCB-free.
- When purchasing paints **or dyes**, ask the suppliers to inquire with the product manufacturers about PCB content.
- Request plain packaging that uses less ink - **a lot of common some** packaging contains PCBs due to **pigments in certain inks. and dyes.**

**In Your Home** - Items in the home that could contain PCBs include certain printed newspapers and product packaging - especially products with green, blue, and yellow inks. Individuals can reduce the amount of PCBs entering the environment by purchasing dye-free products and avoiding products with excessive packaging. Use all natural products with the least amount of chemicals. Do not use certain printed materials and packaging in wood stoves or fire places. Products with the highest levels of PCBs tested include caulking for windows, sidewalks, and bathrooms. When hiring service providers for home maintenance, like landscaping or cleaning, choose companies that manage and reduce their waste.

Items like some yellow sidewalk chalk and children's finger paints have tested positive for PCBs. Request information from manufacturers regarding PCB testing before considering purchasing these materials.

Paints and fluorescent light ballasts may contain PCBs. When upgrading light fixtures, ensure that light ballasts are properly handled and disposed of. When dealing with paint, ensure leftover paint is disposed of properly or reused for another project.

- Individual Page was copied from [www.spokanriverpcbfree.org](http://www.spokanriverpcbfree.org) which was already approved by SRRTFF.
- Source: <http://spokanriverpcbfree.org/education/info-for-homeowners/>

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## **WSDOT HEADQUARTERS ENVIRONMENTAL SERVICES OFFICE**

Municipal stormwater is not just roadway runoff. Municipal stormwater comes from various highly populated areas including private business, residential areas, secondary permittees etc. The roadway focus of the municipal stormwater source for PCBs is misleading and a missed opportunity for outreach and education. For example, it is known that municipal stormwater drains are sometimes used by business and home owners to dispose of nasty liquid stuff, including wet paint.

- Source: <http://srrttf.org/wp-content/uploads/2019/07/NGC-inadvertant-PCB-White-Paper-for-SRRTTF-20181016.pdf>

- Statement now reads: Municipal stormwater runoff: road paints, pesticides, de-icers, other sources from improper industry and individual disposal

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**WASHINGTON STATE DEPARTMENT OF ECOLOGY**

I have a suggestion that the website also reference some of the work that Ecology is doing/has done in this area: <https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Addressing-priority-toxic-chemicals>