Comment No.	Heading	Comment	TLC Response	Resolution	SRRTTF E & O/iPCB TSCA Response
1	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.	Revise URL as it is misleading	"iPCB Free" is an aspirational goal/objective of the SRRTTF and we do believe that it is possible, therefore we are supportive of the "iPCBfree" URL
2	PCB-11	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	Add a comment to the web page to indicate that PCB-11 is the most predominent PCB found in the Spokane River and indicate it does not appreciably bioaccumulate.	There is nothing inaccurate regarding PCB-11 on the website. The website is intended to be an E & O introductory tool on iPCBs, so getting into the details of specific congeners and associated bioaccumulation prevalence is too comprehensive and would likely create another layer of accuracy concerns due to limited information on the bioaccumulation potential of various congeners.
3	"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, which was already approved by SRRTFF. • Source: http://spokaneriverpcbfree.org/education/printable-educational-materials	The sentence needs to be edited as requested as it is not an accurate statement.	We agreed to add "certain" as a qualifier and are willing to add additional products, assuming that there is sufficieint information to substantiate iPCBs as the true source of contamination.
4	Landing Page	T**he 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-Prduct-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. (Comment language continues.)	No Response	Revise the callout to read "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."	See response to Comment No. 3 above
5	Landing Page	Again, we request that all references used to support the indication that products contain iPCBs be provided on the website.	No Response	All refernces to statements need to be provided on the web page.	References will be provided where practicable. We do not agree that all statements require qualification and/or references.
6	About iPCBs Page Comments	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?	Provided link to an E&O Powerpoint that does not contain any information regarding which processes and what circumstances need to be present in order for iPCBs to be formed.	The specific processes where iPCBs are being formed needs to be identified by listing them, providing an appropriate reference that identifies them, or the sentence deleted. General and nonspecific statements such as this are not informative and can be inaccurate.	It is beyond the technical knowledge of the SRRTTF to know all of the processes that can create iPCBs. It is common knowledge that iPCBs can be created in chemical processes that include chlorine at elevated temperatures. Perhaps the industry representatives (pigments, TiO2, inks, paints, AG, etc.) can help us develop a list of these processes for inclusion in the future? In the interim, suggest changing the phrase to: "iPCBs ~~are being~~ may be produced under certain processes that have chlorine and high temperature present".

7	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”.	Provided link to 2018 Northwest Green Chemistry report on iPCBs in Pigments.	The use of "primary" and "secondary" sources to describe how iPCBs are released into the environment is very confusing and the entire discussion needs to be deleted. While these terms were introduced by a report produced by Northwest Green Chemistry, that paper does not contain a reference for it, which means the conept is limited to only this report and is not commonly used. The report and this web page implies that iPCBs are actually being produced or manufactured by all of the identifed sources and this is not accurate. In the case of iPCBs in inks and other colored materials such as coatings, the primary souce is pigments and should be identified as such. Identifying a publisher as a secondary production source is not appropriate as the publisher or any other end user of ink is not manufacturing or releasing iPCBs into the enviroment. If this logic were extended to other sources, then every home and business that contains a desk top ink jet printer should also be identified and that is not appropriate.	See attached suggested edits for "Primary & Secondary Sources"
8	Take Action Page	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	The Sign On call for action needs to be revised to reflect that the TSCA limit on iPCBs is not the reason why the Spokane River is not able to meet the Water Quality Standard for PCB. In fact, if the TSCA limit were revised by setting it at zero, the Spokane River would still not be able to meet the Water Quality Standard for PCBs due to the legacy sources. At best, setting it at zero would may allow one source Inland Empire to meet its wastewater discharge limits. The word may is used because not all of the paper being recycled by Inland Empire would originate in the United States.	The TSCA allowance for iPCBs is a significant contributor of PCBs to the Spokane River and is the focus of this E & O campaign. This is reflected in iPCB-11 being the most prevalent congener found in the water column. A converse argument can be made that removing all legacy sources would not result in attainment of the WQS, so this is not a viable reason for not addressing the iPCB/TSCA concern.
9	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, which was already approved by SRRTFF. • Source: http://spokaneriverpcbfree.org/education/info-for-businesses/ • Source: http://spokaneriverpcbfree.org/education/other-resources/	Simply copying this information from another web page does not address the comment about the purpose and usefulness of this information. Direction 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 must be provided or the links should be removed as they are not relevant.	It is clear that these are "Resources" available to industry for consideration in limiting negative environmental impacts of their operations, some of which may ultimately decrease the production and/or release of PCBs.
10	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.	Education Page was copied from www.spokaneriverpcbfree.org, which was already approved by SRRTFF. • Source: http://spokaneriverpcbfree.org/education/	Revise education page by eliminating the broad and overly generalized statements that are found and to some extent have been revised.	This page was reviewed and there was nothing found that is incorrect.

11	What Can I Do	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.	printable-educational-materials/ • Source: http://srrttf.org/wp-content/uploads/2019/06/4a-FinalDraft_iPCBs-and Pigments.pdf	None of the references provided in the response to comments addresses the presence of iPCBs in dyes and the inclusion of dyes needs to be deleted. Likewise, none of the references provides any more details on "clothing" and "paper products" and unless additional specificty is provided regarding these items, they should also be deleted as it implies that all of them contain iPCBs.	Ecology believes there is data providing evidence that some dyes indeed do contain iPCBs. If Ecology provides data to substantiate this claim then no edits will be made, otherwise "dyes" will be changed to "pigments".
12		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.			See response to Comment No. 11 above
13		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.			See response to Comment No. 11 above
14		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.		Revise the other statements as indicated and either explain what is meant by "old" and "new" or delete those qualifiers. How is some to know what is old and new?	Suggest replacing "old" with "legacy" where appropriate. Legacy means existing products with intentionally added PCBs such as transformer oils, caulk, plastics, rubber, carbonless copy paper, etc.
15		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.			See response to Comment #3 above
16	Where Do They Come From	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.		See the comment above about the "primary" and "secondary" sources of iPCBs. The use of these terms needs to be removed.	See response to Comment #7 above
17	What Is Being Done	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.”			Suggest changing "scientists" to "WA State and the SRRTTF"
18		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.		None of the references provided in the response to comments provides a source for the statement regarding scientists call for action so it needs to be removed.	Suggest changing "scientists" to "WA State and the SRRTTF"

19	"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) 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.	• Infographic was copied from www.spokaneriverpcbfree.org, which was already approved by SRRTFF. • Source: http://spokaneriverpcbfree.org/education/printable-educational-materials/	Simply copying this information from another web page does not address the comment about the innaccuracies contained in the infographic. The infographic either needs to be revised or removed from the webpage.	As discussed, the SRRTTF has no control over other entity websites, references, verbiage, etc. A suggestion was made to include a disclaimer that the SRRTTF makes no claim as to the accuracy of information on referenced materials.
20	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.spokaneriverpcbfree.org, which was already approved by SRRTFF. • Source: http://spokaneriverpcbfree.org/education/info-for-businesses/ • Source: http://spokaneriverpcbfree.org/education/other-resources/	Simply copying this information from another web page does not address the comment about the purpose and usefulness of this information. Direction 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 must be provided or the links should be removed as they are not relevant.	These are "Resources" intended for municipalities. Programs specific to Spokane may also help to inform other municipalities in the development and implmentation of their own programs. For Spokane-centered resources on any page, consider adding a statement to the effect that similar state and local programs may be available in your area/region.
21	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.			This page was reviewed and there was nothing found that is incorrect.
22	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.~~	Individual Page was copied from www.spokaneriverpcbfree.org which was already approved by SRRTFF. • Source: http://spokaneriverpcbfree.org/education/info-for-homeowners/	Simply copying this information from another web page does not address the comment about the innaccuracies contained in the infographic. Please revise the langauge as indicated.	As discussed, the SRRTTF has no control over other entity websites, references, verbiage, etc. A suggestion was made to include a disclaimer that the SRRTTF makes no claim as to the accuracy of information on referenced materials.

23	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.spokaneriverpcbfree.org which was already approved by SRRTFF. • Source: http://spokaneriverpcbfree.org/education/info-for-homeowners/	Simply copying this information from another web page does not address the comment about the innaccuracies contained in the infographic. Please revise the langauge as indicated.	As discussed, the SRRTTF has no control over other entity websites, references, verbiage, etc. A suggestion was made to include a disclaimer that the SRRTTF makes no claim as to the accuracy of information on referenced materials.