

TSCA/iPCB/Green Chemistry Workgroup Meeting Summary
February 2, 2022

TSCA Members in Attendance

Vikki Barthels (SRHD)	Doug Krapas (IEP)
Scott Braithwaite (ACA)	Anna Montgomery (Braided River)
Hollie Davies (DOH)	Robert Mott (Mott Consulting, LLC)
Jeff Donovan (City of Spokane)	Cheryl Niemi (Ecology)
Ben Floyd (White Bluffs Consulting)	Amanda Parrish (The Lands Council)
Lara Floyd (White Bluffs Consulting)	Karl Rains (Ecology)
Lauren Heine (ChemForward)	Lisa Dally Wilson (Dally Environmental)
Gary Jones (Printing United Alliance)	Riaz Zaman (American Coatings Assoc.)

Guests: Naghmana Sherazi was recently hired by The Lands Council as the Climate Coordinator and will also be involved with furthering the iPCB/TSCA Education & Outreach National Campaign effort.

General: None

iPCB/TSCA Agenda Items Discussed:

1. **WA HHWQC Lawsuits: Action: D. Krapas and others (i.e.: Ecology) to provide any updates on the following lawsuits**
 - a. **HHWQC:** Estimated schedule for rulemaking:
 - April, 2022 for Draft Rule
 - June, 2022 for Public Comment
 - January 2023 for Final Rule
 - b. **Settlement requiring EPA to complete a PCB TMDL for the Spokane River:**
 - EPA to complete a TMDL for PCBs in the Spokane River by September 30, 2024.
2. **TDSC EPA Method 1668 study of TiO₂ Pigments:** Testing of TiO₂ using chloride process sold into the following end-use markets in the U.S.: paints and coatings, paper and paperboard, and plastic (Avg. of 0.086 to 1.458 ppb or 86,000 to 1,458,000 ppq)
 - a. See proposed TiO₂ projects in Item 4, 2022 iPCB/TSCA Workgroup Projects below
3. **Education/Outreach: Action: The Lands Council (TLC) is to provide updates on the iPCB National Outreach Campaign project:**
 - a. A. Parrish provided the following update regarding the status of this project:
 - Naghmana Sherazi was recently hired by The Lands Council and will be involved with furthering the iPCB/TSCA Education & Outreach National Campaign effort
 - The revised website should be completed by the end of February 2022
 - TLC intends to complete the brunt of outreach by May 2022 and intends to have a draft final report prepared for SRRTTF consideration by June/July 2022
 - b. D. Krapas received the following questions from G. Jones of the Printing United Alliance via email on 01/04/2022. The workgroup addressed these question with the responses below (in Blue):

- When will be able to see the final version of it? [By the end of February 2022](#)
- There were several outstanding items that needed to be addressed as identified in the comment response document and do you know if they were addressed and if so, how? [These outstanding items will be addressed in the final version of the web page that will be published by the end of February 2022](#)
- During the December Task Force meeting, it was mentioned that the web page is a “work in progress” and will be periodically reviewed. What is the review schedule and the process for review? [Since the development and implementation of this work product is occurring under the guidance of the iPCB/TSCA workgroup, this workgroup in collaboration with TLC will continue to monitor the progress of this effort and can make recommendations for revising as needed.](#)
- When does the funding for the project run out? [The first phase funding for this project expires at the end of the first fiscal year legislative budget on June 30, 2022. Subsequent phases for continuing this Education & Outreach program are expected.](#)
- What happens to the web page when the funding for the project runs out? If it is not taken down, who becomes responsible for maintaining it and updating it? [The web page is currently under the ownership of the SRRTTF and is the responsibility of the Task Force to maintain and update. The web page was created under Square Space and will be linked to the “PCB Free” website of the SRRTTF. Should the SRRTTF not exist in the future, one of the regulating agencies \(EPA, Ecology, DOH, etc.\) could assume ownership. Gary suggested that ownership of the website be identified.](#)

4. iPCB/TSCA Workgroup Projects, Approved & In Process:

- a. ***PCB-11: Sources and Pathways to the Spokane River:*** L.D. Wilson provided an update to this work resulting from the most recent TTWG meeting and conversations with Dave Dilks of LimnoTech who is responsible for this project. When Dave used a 3X blank correction it appeared as if there might be an unknown source of PCB-11 below the USGS gage. But Lisa Rodenburg’s mass balance (which used 1x correction through subtraction) did not indicate a significant source, indicating that ‘the unknown source’ might be a blank issue. Dave will repeat the assessment during the 2022 synoptic survey/mass balance. We are also discussing the possibility of adding a few more water column sampling stations in that reach to break it up into a few smaller reaches for mass balance assessment. That should also be helpful in the assessment. **Action Item: L.D. Wilson to provide updates on the progress of the TTWG on this project**
- b. ***PCB Policies Evaluation, Phase 1: 3rd Party Research Effort:*** See the attached presentation for the February, 2022 update (Braided River_PCB Policies_February Project Update.pdf). **Action Item: Braided River Consulting to provide updates at the iPCB/TSCA monthly meetings.**
- c. ***Develop Industry List of Pigments: Chlorinated vs. Non-Chlorinated:*** The contract with ChemForward was recently completed, so ChemForward is just beginning work on this project. L. Heine is intending use this workgroup to guide the work on this project. **Action Item: ChemForward to provide updates at the iPCB/TSCA monthly meetings.**

5. **2022 Proposed Projects:** The workgroup discussed the following list of projects:

2022 Proposed iPCB/TSCA Workgroup Projects
EPA to perform Cost/Benefit Analysis and reevaluate TSCA
Evaluate existing product testing data to determine if TiO ₂ specific congeners can be identified
Perform statistical analysis of the TiO ₂ data provided
Test known TiO ₂ containing products with nexus to Spokane River to determine PCB concentrations & specific congeners
EPA or Ecology product testing programs to collaborate with the SRRTTF to perform testing of TiO ₂ products
Future Projects based on Completion of Prior Projects
Newsprint/Graphic Printing Trials w/Non-Chlorinated Inks/Pigments
PMF analysis of TiO ₂ Congeners to determine significance in WWTP's, water and/or fish tissue
Market Awareness/Driver's for consumer products known to contain TiO ₂
Projects Previously Approved & In Process
Develop Industry List of Pigments (Chlorinated vs. Non-Chlorinated)
Further Develop iPCB Education & Outreach Campaign Objectives
Lower Procurement Limits Campaign, Phase 1 - 3rd Party research effort
Sources & Pathways of PCB-11, Phase 1 - 3rd Party research effort
Projects Removed from Consideration
Petition EPA to enforce PCBs in products under TSCA-

- a. **EPA to perform Cost/Benefit Analysis and reevaluate TSCA** - K. Rains had misunderstood the request to investigate this opportunity and provide the workgroup with additional information to develop a plan/process. Karl will get with A. Borgias (Ecology) who first suggested this opportunity some time ago. The last TSCA evaluation occurred over 40 years ago and with recent revisions to TSCA, there may be new opportunities to approach EPA for an updated analysis. The group felt that a new dedicated letter requesting a revised analysis is more appropriate than including with the recent correspondences with EPA regarding the NTP work (see Item 5 below). **Action: K. Rains to get with A. Borgias to get additional detail for this project**
- b. **TiO₂ Projects:**
 - i. D. Krapas suggested combining the following two projects into one 3rd party research effort:
 - *Evaluate existing product testing data to determine if TiO₂ specific congeners can be identified*
 - *Perform statistical analysis of the TiO₂ data provided*
 - ii. L. Heine referenced the whitepaper by Northwest Green Chemistry that provided an indication of specific congeners associated with TiO₂. **Action: D. Krapas to redistribute the NWGC whitepaper for reference**
 - iii. Regarding the project *Test known TiO₂ containing products with nexus to Spokane River to determine PCB concentrations & specific congeners*, C. Niemi suggested testing of raw TiO₂ purchased directly from manufacturers to reduce opportunities for PCB contamination with other product components. **Action: Ecology & EPA to evaluate regulatory programs for TiO₂ testing support**
 - iv. G. Jones cautioned that sampling and testing would need to be conducted carefully and under strict quality control measures. **Action: D. Krapas to redistribute the QAPP developed by the TDSC as an example**

6. Safer Products WA: Action Ecology, C. Niemi and C. Manahan to continue updates

The overall website for SPWA is below. This is the place to start for those interested in SPWA. People can sign up for the listserv at this website.

<https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Safer-products>

The EZ View site below is for those who are interested in following the process. People can sign up for the listserv at this website.

https://www.ezview.wa.gov/site/alias_1962/37555/safer_products_for_washington.aspx

- a. C. Niemi reported that Ecology is required to provide a draft report to the legislature by June 1, 2022. This report will include regulatory action determinations for the current priority chemical classes, including PCBs in paints and printing inks.
- b. Ecology completed a draft report on regulatory determinations on November 17 and held a public comment period from Nov. 17 - Jan. 28, 2022

7. TTWG and Funding Groups: Action: L. Dally Wilson & K. Rains to provide updates

- a. L. D. Wilson reported the Technical Workshop was held on January 31 and February 1. See item 4.a. above for an update on the iPCB/TSCA project *PCB-11: Sources and Pathways to the Spokane River*
- b. K. Rains reported no updates for the Funding Workgroup as it pertains to iPCB/TSCA work

8. EPA research opportunities: Action: EPA updates by M. Mullin & L. Edmondson

- d. **iPCB Key words for Scholarly Articles:** M. Mullin had no updates on this project, but committed to following up on the status. **Action: M. Mullin to follow-up on status**
- e. **Children's Product Testing:** See the summary for the presentation by EPA in the October, 2021 meeting minutes
- f. **NTP risk study of various Congeners and Aroclors:**
 - D. Krapas received a letter of response from EPA dated November 15, 2021 (EPA Letter to SRRTTF_111521.pdf) to the letter sent by the SRRTTF inquiring about the status of the NTP work.
 - The EPA letter provides an update on the work being done with PCB-11, but is silent on the other Aroclors and congeners. The iPCB/TSCA workgroup agreed that sending a follow-up letter inquiring about this other work was warranted but not critical path timing wise. **Action: D. Krapas to develop a draft response to the EPA letter.**