

**TSCA/iPCB/Green Chemistry Workgroup Meeting Summary
May 4, 2022**

TSCA Members in Attendance

Vikki Barthels (SRHD)

Hollie Davies (DOH)

Jeff Donovan (City of Spokane)

Ben Floyd (White Bluffs Consulting)

Lauren Heine (ChemForward)

Gary Jones (Printing United Alliance)

Doug Krapas (IEP)

Craig Manahan, Craig (ECY)

Amanda Parrish (The Lands Council)

Naghmana Sherazi (The Lands Council)

Lisa Dally Wilson (Dally Environmental)

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:** On March 29, 2022 EPA published draft HHWQC for WA

- EPA is reversing their prior approval of human health criteria, resulting in a return to a PCB Water Quality Standard of 7 picograms/liter (ppq)
- Public comments to the draft rule are due by May 31, 2022

a. **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. Education/Outreach: Action: The Lands Council (TLC) is to provide updates on the iPCB National Outreach Campaign project:

a. N. Sherazi and A. Parrish provided the following update regarding the status of this project (website: www.ipcbfree.org)

- TLC has been performing the outreach component of this effort with the assistance of an intern using the following talking points:
 1. What are iPCBS
 2. This is how they're made
 3. These are EPA rules
 4. Will you join us in asking for reform of TSCA?
- TLC is reaching out to those on the list developed during the early phases of this project by this workgroup and the Task Force
- A draft final report is scheduled for SRRTTF consideration by June/July 2022
- B. Floyd & D. Krapas recommended review of the summary report first by the iPCB workgroup with final approval by the SRRTTF to finalize the project
- D. Krapas suggested not sacrificing the quality of the product based on the contractual schedule (end of first biennium, June 30, 2022) and to request more time if needed ASAP so modifications to the ACE and Ecology contracts as needed. **Action: TLC to review the schedule and scope of work and provide ACE notification if an extension is needed**

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

- a. **PCB-11: Sources and Pathways to the Spokane River:** this work is currently under the guidance of the TTWG and will be an element of the 2022 low-flow synoptic survey/mass balance in August/September if approved by the SRRTTF at the May meeting. **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:** **Action Item: Braided River Consulting to provide updates at the iPCB/TSCA monthly meetings**
 - A. Montgomery was not available for this meeting, but did send D. Krapas an email stating that Braided River will have the draft available for comment and review by the task force around mid-May
- c. **Develop Industry List of Pigments: Chlorinated vs. Non-Chlorinated:** **Action Item: ChemForward to provide updates at the iPCB/TSCA monthly meetings**
 - See attached presentation update from L. Heine of ChemForward (**Inadvertent PCBs database update_050422.pdf**)
 - The workgroup members had a robust discussion regarding the inclusion of the hazard band and hazard information in the database of pigments
 - G. Jones expressed concerns with the value judgement conveyed by this information and the context in how it might be misinterpreted when applied to mixtures of other products (inks, plastics, paints, etc.)
 - To resolve the value judgement concern, the workgroup agreed to remove the “hazard band” which is a grading system developed by ChemFoward based on the hazard information for each pigment identified
 - For the interim, the majority of the workgroup elected to maintain the “Hazard” tab since this is simply factual information and is consistent with the scope of work for this contract
 - The workgroup will keep this subject on the agenda for future discussion and decision towards completion of this project.

4. 2022 Proposed Projects: The workgroup discussed the following list of projects:

2022 Proposed iPCB/TSCA Workgroup Projects
Request that EPA to perform Cost/Benefit Analysis and reevaluate TSCA
Evaluate existing product testing data to determine if TiO2 specific congeners can be identified
Perform statistical analysis of the TiO2 data provided
Test raw TiO2 and 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 TiO2 products

- a. **EPA to perform Cost/Benefit Analysis and reevaluate TSCA -** K. Rains was not present to provide an update, but did send an email to D. Krapas that he had scheduled a meeting with A. Borgias (Ecology) on 03/03/22 to discuss the details of this proposal. During the April SRRTTF meeting, Karl reported that this meeting did not occur. Karl is also moving onto another position within Ecology, and therefore will not be available for this pursuit. **Action: D. Krapas to meet with A. Borgias to get additional detail for this project**

b. TiO₂ Projects:

- i. D. Krapas suggested combining the first two TiO₂ projects (*Evaluate existing product testing data to determine if TiO₂ specific congeners can be identified and Perform statistical analysis of the TiO₂ data provided*) into one 3rd party research effort. **Action: D. Krapas to develop scope of work for the this TiO₂ project**
- ii. D. Krapas suggested combining the second two TiO₂ projects (*Test raw TiO₂ and products with nexus to Spokane River to determine PCB concentrations & specific congeners and EPA or Ecology product testing programs to collaborate with the SRRTTF to perform testing of TiO₂ products*) into one effort.
 - **Action: D. Krapas to develop scope of work for the this TiO₂ project**
 - **Action: Ecology & EPA to evaluate regulatory programs for TiO₂ testing support**

5. Safer Products WA: Action Ecology, C. Niemi and C. Manahan to continue updates
The overall website for SPWA: <https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Safer-products>

The EZ View site for those who are interested in following the process:

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

- a. C. Niemi was not available for this meeting, but did send D. Krapas and email stating that there were no new updates (The draft report required to the legislature by June 1, 2022 is currently going through an internal review and are still soliciting feedback on any rules/regulatory action)
 - b. C. Manahan stated that Ecology does not intend to provide a written response to comments in response to G. Jones inquiry to the extensive comments provided to the inks section of the report. C. Manahan said that the report will be Ecology's record as Ecology did carefully consider the comments provided and that the report reflects what Ecology took into account.
- 6. TTWG and Funding Groups: Action: L. Dally Wilson & K. Rains to provide updates**
- a. 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 was not present, so no update was provided for the Funding Workgroup as it pertains to iPCB/TSCA work. With the loss of K. Rains due to his new assignment within Ecology, D. Krapas suggested that B. Floyd add the future of the Funding workgroup and leadership to the agenda for the SRRTTF meetings due to the importance of tracking future funding opportunities. **Action: B. Floyd to add the Funding workgroup discussion to future SRRTTF meetings**
- 7. EPA research opportunities: Action: EPA updates by M. Mullin & L. Edmondson**
No EPA representatives were present for the meeting, but D. Krapas received the following email update from M. Mullin on May 5, 2022:

- a. **iPCB Key words for Scholarly Articles:** The Region 10 librarian is working to create an EndNote database for us, which we should be able to update on a regular basis pretty easily. This first cut of the database should be available in a few weeks. However, we may keep it internal for the time being because we want to have some summer interns

review it for QA. We are also looking into possibly publishing this on our iPCB web page. The good news is that after a long hiatus from working on this, we are making progress.

- b. **Children's Product Testing:** We applied for ROAR funding (an internal funding mechanism) in Region 10 and Region 1. We were not selected in Region 10. We have not yet heard if Region 1 has selected our project for funding. We do have some money from HQ that we are trying to spend on product testing right now and those tests will include some inks that WA Ecology sent us. The manuscript from our last round of product testing and exposure pathway analysis has undergone internal review and was submitted for publication. I think we will have an update in the fall on our progress.

- c. **NTP risk study of various Congeners and Aroclors:** No update on this yet, but it is on my list to follow up.
 - 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.**