Organized by Pollution Prevention Hierarchy

Don’t make it

- TSCA Regulatory Reform
  - Lower 50 ppm threshold for “non-PCB”
  - Lower thresholds for allowable PCB in inadvertently produced PCB
- FDA Regulatory Reform
  - Lower allowable limit in fish feed
  - Lower allowable limits in food packaging
- Support green chemistry initiatives to find alternatives to PCB containing pigments
- Work with manufacturers to eliminate inadvertent PCB from state contract products
  - Hydroseed
  - Road paint
  - Paints
  - Other as identified by consumer product testing (Cleaning products?)
- Promote chemical safety congressional reform
  - Producer responsibility for waste disposal
  - Design for the environment
- Provide tax incentives and grants for improvements that reduce toxic threats and for development of safer chemical alternatives.

Don’t use it

- TSCA Regulatory Reform
  - Regulate use of inadvertently produced PCB (i.e., limit use of PCB-containing pigment to specialty uses with minimal to known impact to the environment)
- FDA Reform
  - Prohibit use of inadvertently produced PCBs in food packaging materials

Use less of it

- Construction materials labeling ordinance, similar to the SRCAA Asbestos labeling ordinance
- Ecology Chemical Action Plan
- Implement recommendations
- Shared media and branding materials like the “Puget Sound Starts Here” program: http://www.pugetsoundstartshere.org/
  - “Fix Leaks” program for cars/boats to eliminate exposure from PCB in oils: http://www.ecy.wa.gov/fixcarleaks.html
  - Boat pump out station: http://pumpoutwashington.org/
  - Go natural in your yard: http://www.pugetsoundstartshere.org/tips/try-going-natural-in-your-yard/#.Vv2vEU3Zano

Commented [KW1]: From Adriane Borgias:

Dave,

Here are my comments on the BMP memo.

Mostly I concur with the comments submitted so far.

Attached is a list of actions that I have collected over the years, some of which are appropriately considered to be BMPs (or whatever they are to be called in the future).

There are two lists . . . the same items but organized in different “buckets.”

References provided that may also be helpful.

Thanks,

Adriane Borgias
o Washington Waters pledge
   https://fortress.wa.gov/ecy/waterspledge/WatersPledge.aspx
o Spokane River Forum Envirostars: http://spokaneriver.net/category/envirostars/
o Toxics free tips: http://www.ecy.wa.gov/toxicfreetips/
o Business assistance to use less toxics: TREE
   http://www.ecy.wa.gov/tree/mediaWW.html and LEAN
   http://www.ecy.wa.gov/programs/hwtr/lean/
o Hazardous Substance information: http://www.ecy.wa.gov/hsieo/index.html
o Student education: http://www.ecy.wa.gov/HazardsontheHomefront/

- Health information and fish advisories
- Consumer choice program
  - Continue product testing activities to identify products containing PCB and maintain
    information in public access database.
  - Promote eco-certification programs for consumer products that do not contain priority
    toxics
- Encourage “PCB-free” purchasing regulations, ordinances, and policies by governments and
  businesses in the watershed.

Manage it properly
- Understand pathways of sources to water
- Cross media actions:
  - Identify and use cross-media regulatory tools to the extent possible: MTCA clean up,
    solid waste disposal, recycling programs, air toxics
  - Modify cross-media regulatory tools to the extent possible.
- Identify and remove potential sources (i.e., historic electrical equipment)
- Hazardous waste inspections and technical assistance
- Increase TSCA inspections and enforcement
  - PCBs in pigments
- Manage stormwater
  - Erosion controls
    - Riparian restoration and enhancement
    - Sediment and erosion control BMPs
  - Manage stormwater onsite
  - Isolate source from stormwater system
  - Storm drain marking
  - Catch basin maintenance
- City of Spokane Integrated Water Plan

Dispose of it properly
- Manage and monitor former and current legacy spills
- Donkey Island
- Upriver Dam
- Kaiser Aluminum
- City Parcel
- General Electric
- Spill response

- Identify sources
  - Identify buildings which, due to age, potentially contain PCB in building materials and cauks
    - State and local government
    - Schools
    - Other

- Develop management standards for removal and disposal of legacy PCBs in building materials.
- Pass local ordinances with management standards for identification, management, and disposal of PCB containing building materials during remodel and demolition.
- Land use/development ordinances/standards that encourage LID and decrease impervious surfaces.

_Treat at end of pipe_

- Permit requirements
- Permittee Toxics Management Plans
- Identify new treatment technologies, such as fungi, biochar
- Install membrane technology on treatment plants
- Fish removal (i.e., carp)
SAME AS ABOVE REORGANIZED BY TOPIC

Regulation

- TSCA Regulatory Reform
  - Lower 50 ppm threshold for “non-PCB”
  - Lower thresholds for allowable PCB in inadvertently produced PCB
- FDA Regulatory Reform
  - Lower allowable limit in fish feed
  - Lower allowable limits in food packaging
- TSCA Regulatory Reform
  - Regulate use of inadvertently produced PCB (i.e., limit use of PCB-containing pigment to specialty uses with minimal to know impact to the environment)
- FDA Reform
  - Prohibit use of inadvertently produced PCBs in food packaging materials
- Construction materials labeling ordinance, similar to the SRCAA Asbestos labeling ordinance
- Cross media actions:
  - Identify and use cross-media regulatory tools to the extent possible: MTCA clean up, solid waste disposal, recycling programs, air toxics
  - Modify cross-media regulatory tools to the extent possible.
- Ecology Chemical Action Plan
  - Implement recommendations
- Pass local ordinances with management standards for identification, management, and disposal of PCB containing building materials during remodel and demolition.
- Hazardous waste inspections and technical assistance
- Increase TSCA inspections and enforcement
  - PCBs in pigments
- Promote chemical safety congressional reform
  - Producer responsibility for waste disposal
  - Design for the environment
- Land use/development ordinances/standards that encourage LID and decrease impervious surfaces.
- Provide tax incentives and grants for improvements that reduce toxic threats and for development of safer chemical alternatives.

Education

- Shared media and branding materials like the “Puget Sound Starts Here” program: [http://www.pugetsoundstartshere.org/](http://www.pugetsoundstartshere.org/)
  - “Fix Leaks” program for cars/boats to eliminate exposure from PCB in oils: [http://www.ecy.wa.gov/fixcarleaks.html](http://www.ecy.wa.gov/fixcarleaks.html)
  - Boat pump out station: [http://pumpoutwashington.org/](http://pumpoutwashington.org/)

Washington Waters pledge [https://fortress.wa.gov/ecy/waterspledge/WatersPledge.aspx](https://fortress.wa.gov/ecy/waterspledge/WatersPledge.aspx)

Spokane River Forum Envirostars: [http://spokaneriver.net/category/envirostars/](http://spokaneriver.net/category/envirostars/)

Toxics free tips: [http://www.ecy.wa.gov/toxicfreetips/](http://www.ecy.wa.gov/toxicfreetips/)


- Health information and fish advisories
- Consumer choice program
  - Continue product testing activities to identify products containing PCB and maintain information in public access database.
  - Promote eco-certification programs for consumer products that do not contain priority toxics
- Encourage “PCB-free” purchasing regulations, ordinances, and policies by governments and businesses in the watershed.

**Understand the watershed**

- Identify sources
  - Identify buildings which, due to age, potentially contain PCB in building materials and caulks
    - State and local government
    - Schools
    - Other
  - Understand pathways of sources to water

**Research**

- Support green chemistry initiatives to find alternatives to PCB containing pigments
- Identify new treatment technologies, such as fungi, biochar

**Best Management Practices**

- Manage and monitor former and current legacy spills
  - Donkey Island
  - Upriver Dam
  - Kaiser Aluminum
  - City Parcel
  - General Electric
- Install membrane technology on treatment plants
- Develop management standards for removal and disposal of legacy PCBs in building materials.
- Identify and remove potential sources (i.e., historic electrical equipment)
- Fish removal (i.e., carp)
- Work with manufacturers to eliminate inadvertent PCB from state contract products
  - Hydroseed
  - Road paint
  - Paints
  - Other as identified by consumer product testing (Cleaning products?)

Manage discharges
- Permit requirements
  - NPDES
  - Stormwater MS4, CSO, Adaptive Management Plan actions
- Permittee Toxics Management Plans
- City of Spokane Integrated Water Plan
- Manage stormwater
  - Erosion controls
    - Riparian restoration and enhancement
    - Sediment and erosion control BMPs
  - Manage stormwater onsite
  - Isolate source from stormwater system
  - Storm drain marking
  - Catch basin maintenance

References:


*Toxics Reduction Advisory Committee Findings and Recommendations* at https://fortress.wa.gov/ecy/publications/SummaryPages/0804029.html

Spokane Regional Clean Air: https://www.spokanecleanair.org/asbestos/washingtons-asbestos-labeling-law