TSCA Solutions

- Technical:
  - Develop alternative (non-chlorinated) products
  - Develop products w/reduced levels of PCBs
  - Eliminate Phthalocyanine dyes and replace with non-PCB alternative products
  - Establish new threshold for Dialyride yellow dyes at 1 ppm – CPMA Domestic
  - Develop new end-of-pipe treatment for PCB abatement
  - Perform risk assessment of all 209 congeners

- Regulatory/Policy/Legal:
  - Eliminate TSCA allowance for inadvertent PCB products
  - General phase-out of TSCA allowance (level playing field, 1 ppm)
  - Encourage End-Users to use lower or non-PCB containing products (Publishers, Printers, Packaging, State DOT’s, etc.)
  - Incentivize competitive marketing advantage with use of non-PCB containing products
  - Regulate only the 12 Dioxin like PCBs
  - Do not regulate lower congener PCBs (Europe)
  - Provide NPDES permit offsets for inadvertent PCBs
  - Provide NPDES Permit exclusion for inadvertent PCBs
  - Streamline approval/cost for new chemical products
  - Federal (Government Accountability Office) or State Bills to address above

- Convene Stakeholder Task Force to vet & offer solutions:
  - Regulatory, Technical, Legal and Policy