**Spokane Regional Toxics Task Force**
**TSCA Workgroup**
**Proposed Plan of Activities**
**July 11, 2018 Meeting Summary**

**Conference Call Attendees:**
Doug Krapas (Inland Empire Paper Company)
Lisa Dally Wilson (Dally Environmental)
Cadie Olson (City of Spokane)
Tom Agnew (Liberty Lake Sewer & Water District)
Lucy Edmondson (EPA)
Elsa Pond (WA DOT)

**Meeting Notes (General):**

- Greg Lahtig of WA DOT has extended his retirement plans to work on fish passage projects. Elsa was unsure if he will continue to participate in the TSCA workgroup, so we will keep Greg on the distribution list until further notice.
- Doug has invited Lauren Heine to join the TSCA workgroup due to her work in Green Chemistry and relationships developed in reaching out to ink suppliers and users. She was unable to attend this meeting but is interested in future endeavors.
- Next meeting of the TSCA Workgroup will be via conference call on Wednesday, August 1 from 10:00 to 11:00. **Action Item:** we need to establish a new conference line with the loss of the Ruckelshaus line. Lisa has volunteered to provide her line if we do not have another established by White Bluff by that time.
- Meeting notes for each Task # below are provided at the end of each task and shown in **Blue** and Action items are shown in **Red**.

1. **Task #1 – Yellow Road Paint Pilot**
   a. Description – complete work started with the American Coatings Association (ACA) to eliminate the use of diarylide yellow pigments in road paints in WA State and perhaps across the U.S. WA DOT needs to follow-up and incorporate into their purchasing specification, along with the City of Spokane and Spokane County. Also need to work on a national level to and consolidate the number of paint formulations from the current 38 down to approximately 8 (cost reduction).
   b. Responsible Parties – Doug Krapas, Lisa Dally Wilson, Mike Peterson, WA DOT, City of Spokane, Spokane County, EPA

**Meeting Notes for Task #1:**

- Cadie stated that the City has hired a new Streets Director that will ultimately appoint a leader to address this issue for the City. In the interim, Doug Greenlund and Jeff Donovan have responsibility for evaluating.
- Lisa mentioned that Post Falls received the SRRTTF letter requesting that anyone with a nexus to the Spokane River to adopt a similar standard to use
non-chlorinated road paints. They are currently using Pigment Yellow PY-65 which is supposedly non-chlorinated. We are to receive a letter from the Mayor confirming this statement.

- Tom stated that Liberty Lake will follow Spokane County’s lead. Doug had spoken to Rob Lindsay since the last TSCA workgroup meeting and Rob confirmed that the County intends to adopt a similar provision to WA DOT.

**Action Items:**

1. Doug is to follow up with all recipients of the SRRTTF letter to see if they intend to adopt similar provisions for the use of non-chlorinated road paints.

- Discussed the action item to investigate national level standardization of road striping paints to both reduce the number of formulations and eliminate diarylide yellow based paints:
  - Elsa stated that conversations within WA DOT have identified two Federal agencies that were likely to have jurisdiction over such decisions: AASHTO – The American Association of State Highway Transportation Officials (AASHTO) and the Federal Highway Administration (FHWA)
  - Doug had conversations with the American Coatings Association (ACA) and they suggested that we keep our powder dry until we have some time to evaluate how this works in WA State first.
  - The TSCA workgroup was in agreement that we should take some time to evaluate the effects in WA State before developing strategies to extend on a national basis. This task will remain on our Task List for future evaluation.

**Action Items:**

1. The TSCA Workgroup needs to solicit progress reports from WA DOT, City of Spokane, Spokane County and other involved parties to evaluate how the use of non-chlorinated road paints is working. Schedule check-ins every six months, beginning in January, 2019.

2. **Task #2 – Printing Inks Pilot**
   a. Description – similar to Task #1 above, continue working with the Color Pigment Manufacturers Association (CPMA) and Mark Vincent of Dominion Colour towards the development of non-chlorinated pigment based inks used in the publishing of newspaper, magazines and advertisements. Perhaps run trials with select publishers to assess the characteristics of alternative non-chlorinated products.
b. Suggest using purchasing power, contracts and marketing strategies to educate the purchasers of TSCA containing PCB products (examples: Amazon, HP, publishers). A caution that we need to get our facts straight before pursuing.
c. Responsible Parties – Doug Krapas, Doug Grenlund, Adriane Borgias (TSCA concerns), Mike Peterson, David Wawer (CPMA), Mark Vincent (Dominion Colour), Publishers

**Meeting Notes for Task #2:**

- Doug & Lauren Heine spoke with a representative from HP that produces inks for a variety of uses, including printing and packaging. They are aware to the issue and appear to be willing to work with us. We will continue these discussions with HP and others to encourage development of non-chlorinated alternatives.

3. **Task #3 – Investigate Technical, Legal and Policy Solutions**
   a. Description – continue investigation of the Technical, Legal and Policy Solutions document (attached) to determine what, if any, may be worth pursuing. This includes ranking the solution list according to feasibility, resources and timing, then pursuing any feasible options.
   b. Responsible Parties – Doug Krapas, Lucy Edmondson (EPA), Lisa Dally Wilson, Adriane Borgias

**Meeting Notes for Task #3:**

- Lucy stated that EPA is focused on getting a response to the SRRTTF letter to Chris Hladick, and then they will focus on the Solutions Document.

**Action Items:**

1. EPA to provide a response to SRRTTF letter to Chris Hladick

2. Lucy to review solutions document with Region 10 and EPA HQ as a first cut to evaluate feasibility.

3. Doug, Lucy, Lisa and Adriane will conduct a follow-up meeting to discuss the first cut findings and then develop a prioritization of options.

4. **Task #4 – PCB-11 Risk Assessment**
   a. Description – EPA in a letter of response to the SRRTTF dated February 24, 2015 (attached), EPA requested that toxicity testing be conducted on PCB-11 by the National Toxicology Program at the National Institute of Environmental Health Sciences. This promise was made 3 years ago in 2015 and we have not had any
feedback from EPA on the results of this study. Need a champion within EPA to follow-up on the status of this project.
b. Responsible Parties – Doug Krapas, Lucy Edmondson, Ecology

Meeting Notes for Task #4:

- Lucy obtained additional information that the National Toxicology Program at the National Institute of Environmental Health Sciences is currently working on this request. There is currently no scheduled date for completion.

Action Items:

1. Lucy to continue follow-up.

5. Task #5 – Public Relations Campaign
   a. Description – continue work on educating regulating agencies, legislators, end users (publishers, packaging, consumers, etc.), environmental interests, tribes, and the general public on the TSCA concern, its implications and potential remedies.
   b. Responsible Parties – Doug Krapas, Education Workgroup, Green Chemistry Workgroup, Dr. Lauren Heine and Charlotte Trebilcock (NW green Chemistry), Tony Kingsbury and many others.

Meeting Notes for Task #5:

- The group felt that there was not an immediate need to coordinate with the Education and Public Outreach group until we have further developed our own strategies. We will keep this task as a placeholder for future efforts.

6. Task #6 – SRRTTF to submit Issues Letter to Chris Hladick (EPA Director):

Meeting Notes for Task #6:

- This task has been completed and we are currently awaiting EPA response (see Meeting Notes and Action Items for Task #3 and #4 above)

7. New Task #7 – Workshop:
   a. Description – Lisa proposed the idea for a future stakeholder workshop that includes participation by business, industry, and regulators to discuss and develop solutions to pigment related TSCA issues, including working with industry (HP, CPMA, ACA, etc.) to investigate inks and dyes alternatives, investigate various elements of the Solutions Document, etc.
   b. Responsible Parties – Lisa to take a leadership role in development of this concept