SRRTTF - TSCA Workgroup Sponsored Stakeholder Workshop
Inadvertently Produced PCBs in Pigments – Sustainable Solutions

Background

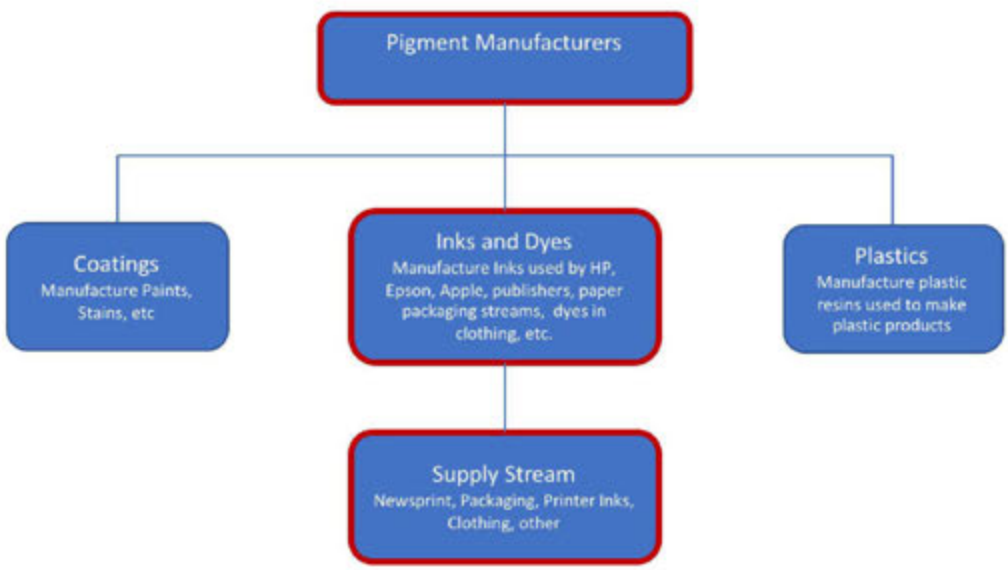
In November of 2016, the EPA published revised Water Quality Standards for Washington State[1] that reduced the state standard for total PCBs from 170 parts per quadrillion (ppq) to 7 ppq. In contrast to this more stringent standard, the U.S. Environmental Protection Agency (EPA) authorizes a nominal 50 parts per million (ppm) use allowance for inadvertently generated PCBs in products under federal Toxics Substance Control Act (TSCA) regulations. The TSCA allowance is seven billion times higher than the new WA state water quality standard. These inadvertently generated PCBs can be found in a wide array of consumer products including paints, printing inks, clothing dyes, newspaper, magazines and packaging.

The discrepancy between the TSCA allowance and the new water quality criteria becomes apparent when products such as clothing are washed, and newsprint and packaging materials are recycled, and inadvertently generated PCBs are discharged to the river as effluent from municipal wastewater treatment plants and recycling facilities. The inadvertent PCBs in the products are transferred to water discharges at concentrations significantly higher than the water quality limits, despite treatment with best available water treatment technologies. There appears to be little regulatory or political will at the federal level to reduce this TSCA allowance.

Workshop Proposal

The TSCA Workgroup of the Spokane River Regional Toxics Task Force (SRRTTF) is exploring voluntary measures to reduce inadvertent PCBs in products in their efforts to keep PCBs from entering the Spokane River. As part of this effort, the workgroup proposes to host a multi-stakeholder workshop to address inadvertent PCBs in pigments and the downstream products that are manufactured using those pigments. The supply stream for pigment-containing PCBs is outlined in red in Figure 1.

FIGURE 1: Supply Streams for Pigments Containing Inadvertent PCBs



[1] https://www.gpo.gov/fdsys/pkg/FR-2016-11-28/pdf/2016-28424.pdf

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The goal of the workshop is to bring all interested parties together to brainstorm solutions to:

- Reduce the level of inadvertent PCBs in these products
- Identify best practices and existing alternatives
- Identify barriers and constraints to alternatives
- Develop relationships and encourage innovative partnerships
- Determine voluntary measures to implementation

Stakeholders include representatives from across the entire supply chain:

- Pigment, ink and dye manufacturers,
- Businesses and industries that utilize those pigments, inks and dyes
- Downstream suppliers of packaging, dyes and inks
- Industry organizations (eg., Color Pigments Manufacturers Association (CPMA), American Coatings Association (ACA), NAPIM, Sustainable Packaging Coalition(SPC), American Chemistry Council (ACC), Sustainable Packaging Coalition (SPC))
- Researchers developing new technologies
- Recyclers
- Government procurement experts and regulators.

These stakeholders will gather to share information and discuss and develop potential solutions. Solutions may include identification of ink and dye alternatives, purchasing policies, identifying industry incentives to sustainable practices, and more.

The workshop is to be held in Spokane for the benefit of SRRTTF members and the primary focus will be on Washington State. Invitees are expected from around the nation. A planning committee will be formed to provide further definition to these preliminary concepts.

Co-Sponsorship

There has been some consideration given to co-sponsoring this workshop with the Department of Ecology (Ecology) as part of the establishment of a new working group by Ecology. Ecology's proposed 'PCBs in Products Workgroup' will include representatives from industry, manufacturers, state agencies, institutional purchasers, local governments, tribes, nongovernmental organizations, other states and the U.S. EPA. The intent of the PCBs in Products Workgroup is to work together to conduct a pre-competitive technology feasibility assessment to better understand opportunities and challenges, technical issues, and drivers or limitations and set measurable goals to reduce PCB levels in colorants in pigments and inks used in paper products. Discussions between Ecology and the TSCA workgroup of the SRRTTF regarding co-sponsorship are ongoing. There may be an opportunity to co-host a workshop has part of the Fall 2019 ECOS meeting and MOU signing for the Ecology workgroup.

Scope and Budget

A small planning committee from the TSCA workgroup will convene to develop scope and budget for this workshop. Co-sponsorship with Ecology would allow for cost sharing with the SRRTTF. The cost sharing may involve funding assistance or in-kind contributions of Ecology staff time for event planning.