

Grice, Joshua (ECY)

From: Hoiland, Richard [Richard.Hoiland@cityofvancouver.us]
Sent: Thursday, February 14, 2013 3:59 PM
To: Kraege, Carol P. (ECY)
Cc: Griffy, Annette
Subject: Washington's Toxics Policy Reform Report - Comments
Attachments: Toxics Policy Reform Paper comments.doc

Hi Carol,

I've read through your *Toxics Policy Reform* report and prepared some comments and suggestions. In general, nice job! Your team tackled the task very comprehensively. My comments are mostly style change recommendations.

If your recommendations are adopted by lawmakers and regulatory agencies it will certainly help to speed up efforts to reduce potential threats due to toxics in Washington State.

Richard

Richard Hoiland, PE | City of Vancouver | Surface Water Management | (360) 487-7199 |
www.cityofvancouver.us/waterprotection

Toxics Policy Reform Paper - January 2013

Comments and Suggestions from Richard Hoiland, PE - City of Vancouver Water Protection

Page 3 - repeats “the”

dispersed sources of toxic chemicals through consumer goods and other pathways, legacy contamination—the the public and the environment bear the risk and burdens of toxic chemical exposures.

Page 4 - grammar, “cancers..., it is” should be “they are”

Cancer. Childhood cancers account for about two percent of all cancer cases in the U.S.; however, except for injuries, it is the most common cause of death in children age 1 to 14

Page 5 - Environment section

Following the bullet points on non-point sourced toxics loading into Puget Sound there is some discussion about other pathways such as air deposition and untreated pharmaceuticals. This would be a good place to mention fluoride treatment of drinking water which is currently being looked at closely to determine whether the benefits actually outweigh potential costs to health and environment. Of concern in Portland’s consideration of fluoridation are the health risks to children, to infants who use formula with fluoridated water, and to at-risk populations. The statement on Page 9 supports this:

The best, most reliable, and most efficient way to reduce exposures to toxic chemicals is to reduce the use of toxic chemicals in favor of non-toxic or less-toxic alternatives.

Page 6

sources can be a significant contributor of toxic contaminants to our watersheds, but the Clean Water Act is not adequately designed to address pollution from non-point sources and so is difficult and inefficient to use to address these problems.

awkward, could be rewritten to say: “... to our watersheds, but because the Clean Water Act is not adequately designed to address pollution from non-point sources, it is difficult and inefficient to use it to address these problems.”

Page 7 - Shared Responsibility (for addressing toxics)

In the “Government’s role” section it mentions protecting people, establishing priorities, enforcing standards, educating and providing access, but there is no mention of either the work done by government on the research of chemical toxicity or the gathering and analyzing of the countless monitoring reports that are submitted regularly to agencies. Does this indicate those particular responsibilities will be changing? It seems that government serves the public best by participating in research, monitoring, identification, and verification of potential toxins.

Page 11 - Section 2, Chemical Priorities

The acronym PBT is stated here and I couldn’t find it spelled out previously in the document. Even if it is this would be a good place to re-state what I assume is persistent, bioaccumulative toxins. The chart, although it has a pleasing design and colors, is pretty vague (“May be a High Priority”, “Low to Moderate Priority”). Could this be tightened up some? Personally I would rate PBT chemicals which may have low toxicity but long-term exposure as “Moderately High Priority” along with high toxicity and low exposure chemicals.

Page 12 - top of page, “amount of different”, should be “difference”

(our level of confidence that, if implemented, the strategy would make a difference and the amount of different we think it would make). Ideally, we want strategies and actions that we

Page 12 - 2nd paragraph, “its implementation of the PBT program”, this program comes up without much explanation. May want to explain it a little more.

Ecology used a step-wise process like this in its implementation of the PBT program, wh

Page 12 - May want to include a more direct referral to what is presented in Figure 2 as it doesn't seem to relate directly to what is talked about on the page.

Page 17 - on labeling:

We also believe that labeling is an opportunity to work collaboratively with other states in the region—to establish something that would benefit consumers and innovative manufacturers
This point could be made more strongly than as just a belief. Maybe something like, “We recommend that Washington collaborate with other states in the region - to establish labeling procedures that would benefit consumers and innovative...”

Page 17 - upstream and downstream, bottom of the page:

In our current system, the people who make decisions about toxics in products and manufacturing (producers, manufacturers, and retailers) often are different and disconnected
Saying that the people who make decisions often are “different and disconnected” is a little awkward. Maybe get rid of the “different” and just leave it that people upstream are often disconnected from those downstream.

Pages 20, 23 sidebar titles: It might be clearer to use the small “s” at the end, PCBs, PBDEs

PCBS PBDES

Pages 9 - 24, points 1 to 12. Points 1, 2, 3 and 4 begin with “Washington should”, while points 5 to 12 begin with “We recommend”. Do these need a parallel expression? I'd vote for the “We recommend” as it doesn't carry the more moralistic “should” tone. If the “should” in the first 4 points is meant to indicate a greater preference, maybe “strongly recommend” would be appropriate for those. Since “we” is used throughout the document it might be helpful to describe who “we” refers to.

Pages 25 and 26. Along those lines, the Recommendations listed are all as “should”, “Washington State should establish a clear policy”, “Ecology should work with partners”, etc.
It would be possible to get rid of all of the should's by beginning the list with something like “This Review Strongly Recommends That:” and then follow with 1. Washington State establish a clear policy, 2. Ecology work with partners, etc.