

Grice, Joshua (ECY)

From: Mike Petersen [mpetersen@landscouncil.org]
Sent: Tuesday, March 05, 2013 4:56 PM
To: Kraege, Carol P. (ECY)
Subject: Toxics Policy Reform

Carol,

I would like to comment on the Toxics Reduction Strategy (TRS) Workgroup's final white paper, Toxics Policy Reform for Washington State (Jan 2013). The Lands Council is a member of the Spokane River Toxics Task Force, but these comments are only those of the Lands Council

I appreciate that considerable work has gone into the white paper. The recommendations are good, but the issue of toxics reduction is complicated by 1) A lack of information about where toxics are coming from, particularly those found in water bodies, and 2) An inability to control import of toxics across national and state lines.

In the case of PCB's, an Ecology assessment for the Spokane River indicated over half of the source of PCB's were unknown. New sources are entering Washington State from aerial deposition, as well as products manufactured well after the ban. The EPA has been asked to not allow current levels of PCB's to enter the country, and it seems unclear whether the standards will change.

Suggestion: The recommendations of the TRS Workgroup should include a plan to work with the federal government and surrounding states to change federal policies.

The white paper has a recommendation to study along the supply chain to identify product liability and responsibility, as well as study safer alternatives.

Suggestion: Partner with other states and the EPA, who are looking at these same toxic issues. Otherwise Washington State may find itself either duplicating efforts that may have already been completed, or possibly attracting lawsuits by national and international producer of toxic materials.

The Green Chemistry Center has merit. Related to this, innovative ways of treating contaminated stormwater are being developed by the Washington Stormwater Center. There should be close coordination on water borne contaminants. Perhaps a component of the Green Chemistry Center should be housed at the Stormwater Center.

With the thousands of toxic and possibly toxic chemicals being created and imported into our state it will be difficult to prioritize and keep focused. The white paper seems to focus more on human health impacts as opposed to environmental health impacts. The Lands Council hopes that priorities will consider the environment and that actions to reduce toxics will not be delayed by undue planning and studying.

Thank you,

Mike Petersen, Executive Director
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