

**TOXICS REDUCTION STRATEGIES  
SOLUTIONS MATRIX**

| Area of Focus            | Proposed Action                                  | Description  |
|--------------------------|--|--|
| <b>Define Priorities</b> | <b>Prioritize Toxics</b>                         | Identify toxics of critical concern. Are we looking at the right targets (for example: are we missing chemicals that are not on current priority pollutant lists or should we be focusing on specific PCB Congeners known to be toxic in lieu of total PCBs)   |
|                          | <b>Critical Exposure</b>                         | Identify where we are most at risk - consumer products, food supply, environmental exposure  |
|                          | <b>Assess Programs</b>                           | Identify where current environmental programs are failing and implement reforms accordingly  |
| <b>Source Control</b>    | <b>Consumer Awareness Hazardous Products App</b> | Use the power of the consumer to drive manufacturers towards the development of safer alternatives by developing a program to educate and inform consumers about products that are known to contain toxic components, providing them the option to cross check and select alternative products. This can be accomplished through an Ecology web link, You Tube or phone-app, similar to programs such as EWG's "Dirty Dozen" or Sustainable Seafood Lists.   |
|                          | <b>Intermediate Manufacturer Awareness</b>       | Use the power of business and industry to drive manufacturers towards the development of safer alternatives by developing an information campaign to educate manufacturers that are using products known to contain toxics in the use or manufacture of their products that ultimately may be introducing toxics into the environment. Examples include photo/DeskJet copier manufactures and newspaper and magazine publishers who may all be using inks known to contain PCB's.  |
|                          | <b>TSCA Revisions</b>                            | Continue efforts towards reform of TSCA revisions that currently allow toxics such as PCB's to be manufactured in consumer products and ultimately end up in the environment. Efforts such as the ECOS resolution need to be built upon at a national level to pressure EPA to take the appropriate action to reduce or eliminate the manufacture and distribution of toxics that have a direct pathway into our environment.  |
|                          | <b>NPS Controls</b>                              | Since its creation, the CWA has been successful in reducing pollutants from point source dischargers through the NPDES permitting program, but has little influence in reducing non-point sources of pollution. In many cases, non-point sources of pollution greatly outweigh that from point source discharges, making attainment of WQS difficult, if not impossible, and creating additional duress for point source discharges. Additional emphasis needs to be placed on non-point source controls either through Federal or State legislation or regulatory reform. |

**TOXICS REDUCTION STRATEGIES  
SOLUTIONS MATRIX**

| Area of Focus  | Proposed Action   | Description   |
|--|---|---|
| <p style="text-align: center;"><b>Implementation Solutions</b></p> | <p style="text-align: center;"><b>Phased Implementation</b></p>             | <p>Develop a phased implementation program to allow for point source and non-point source reductions with step-wise goals towards ultimately achieving water quality standards. Phased implementation has been used in other states and watersheds as an innovative means to deal with very difficult water quality attainment plans (Puget Sound Toxics, Chesapeake Bay TMDL, Florida Nutrient Management, Wisconsin Nutrient Management)</p>  |
|  | <p style="text-align: center;"><b>Phased Permitting</b></p>                 | <p>Phased NPDES permitting would be used as an element with the phased implementation program described above, establishing step-wise permit conditions based on economic feasibility and available technologies with the ultimate goal of meeting currently unattainable waste load allocations resulting from the States water quality standards. Phased NPDES permitting has been used for municipal stormwater permitting.</p>  |
|  | <p style="text-align: center;"><b>Straight to Implementation</b></p>        | <p>Straight to implementation provides an alternative approach to more complex, lengthy and contentious water quality improvement plans such as TMDL's and allows resources to be allocated directly towards immediate environmental improvement. Straight to implementation also allows for a narrative approach towards achieving water quality standards. The straight to implementation process was developed by WA Ecology and is being used in various watersheds, including the Spokane River for PCB mitigation.</p>  |
|  | <p style="text-align: center;"><b>NPDES Permit Implementation Tools</b></p> | <p>Dischargers require additional implementation tools to comply with stringent and potentially currently unattainable waste load allocations resulting from WA states WQS. Current implementation tools approvable under the CWA, such as variances and compliance schedules, are cumbersome, contentious and expensive. New implementation tools need to be developed that allow dischargers flexibility to work towards technically and economically achieving the waste load allocations without subjecting them to litigation. This may be accomplished with creative development within the confines of the CWA and State regulations or with regulatory reform of the CWA and State regulations.</p> |

**TOXICS REDUCTION STRATEGIES  
SOLUTIONS MATRIX**

| Area of Focus            | Proposed Action | Description   |
|--------------------------|-----------------|---|
| <b>Regulatory Reform</b> | <b>Federal</b>  | TSCA Source Reduction/Elimination                                       |
|                          |                 | CWA reform regulations for NPS control                                  |
|                          |                 | CWA reform to allow for new NPDES Implementation Tools                  |
|                          | <b>State</b>    | Adoption of NPDES Implementation Tools in state Water Quality Standards |
|                          |                 | Target toxics of concern in state regulatory criteria                   |