

Washington Toxics Reduction Strategy Group

Draft Ideas about Addressing Distributed Sources- 11/15/2012

This document contains a working draft of ideas the TRS group has raised about how distributed sources of pollution such as roofing, copper breaks, zinc in tires might be addressed to reduce exposures to toxics.

Overarching Observations

- There can be a disconnect between the people who make decisions about toxics in products and manufacturing (producers, manufacturers and retailers) and those who bear the responsibility to clean up toxic contamination in the environment. This is especially true for distributed sources in consumer products such as cars.
- Some of the toxic load from distributed sources ends up in stormwater and must be managed under stormwater permits (or it ends up in Puget Sound or other water bodies).
- Enlisting the people who are faced with managing toxic loads from distributed source, particularly stormwater permittees, in repairing connections between producers, manufacturers and retailers
- Making producers, manufacturers and retailers (and by extension, potentially consumers) responsible for some of the costs of managing toxics from distributed sources is a way to repair these connections.
- Using incentives and market factors to encourage safer alternatives may be a way to get them to market faster and to enlist more actors in the work to reduce toxics.
- Providing support for producers, manufacturers, and retailers to identify and develop safer alternatives is consistent with the idea of shared responsibility for toxics reduction.

Ideas for Discussion

Distribute Responsibility for Stormwater Contamination

- Identify key sources of pollution to stormwater (e.g., copper and zinc and other contaminants from roofing materials) that are difficult to capture and remediate with existing technologies.
- Convene a dialogue with stormwater permittees and producers, manufacturers and retailers designed to identify a specific strategy to reduce stormwater loads at the primary source (e.g., get metals and other contaminants out of roofing) by a certain date.
- Established phased permit discharge limits so that, so long as the dialogue is productive, discharge limits would be based on aggressive implementation of available technologies, but recognize difficulty in addressing sources that are not under the control of the permittee and acknowledge the value of the permittee's participation in source reduction.
- If the dialogue is not productive, move to numeric permit discharge limits and distribute the costs of compliance to producers, manufacturers and retailers through a fee or tax on products that create sources.

Discussion questions:

1. How should priority distributed sources be identified?
2. How should standards for pollution control be established during the window when source reduction efforts are ongoing? Technology based? Numeric? Both?
3. What incentivizes producers, manufacturers and retailers to participate in a dialogue about source reduction and make investments in safer alternatives?
4. Who would convene and support such a dialogue?
5. What should be the time window for such dialogues?
6. How would a tax or fee be imposed and set?
7. Can the state marshal sustained interest and investment in such a program?
8. What would be the first step in implementing such an approach?

B. Support Municipalities in Removing Pollution Before it Gets in Stormwater

- Seattle has identified a street sweeping strategy to collect toxics in street dust/dirt. This method has shown to be superior to any other technology to collect dispersed contaminants and is more efficient than managing the stormwater contaminated with this pollution, or contamination of environmental endpoints for stormwater (e.g., water and sediment).

Discussion questions:

1. How can technologies like this be incentivized and shared throughout the Region?
2. Can the state marshal sustained interest and investment in such a program?
3. What would be the first step in implementing such an approach?