

6PPD ACTION PLAN ADVISORY COMMITTEE MEETING

Virtual (Zoom)
Tuesday, May 21, 2024
10:00 a.m. to 12:00 p.m.
Facilitator: Tanya Williams
Meeting 6 of 6

Attendees

Advisory Committee members in attendance and the organizations they represent:

Aimee Navickis-Brasch (Evergreen StormH2O); **Angela Bolton** (City of Bellevue); **Augie Krupp** (Molecular Rebar); **Chelsea Mitchell** (King County); **Ed Kolodziej** (University of Washington – Tacoma); **Eli Mackiewicz** (City of Bellingham); **Fran Solomon** (Western Washington University); **Haley Lewis** (Environmental Protection Agency); **Heather Trim** (Zero Waste Washington); **Heidi Siegelbaum** (WSU Stormwater Center); **Jamie McNutt** (Flexsys); **Jeff Durant** (Flexsys); **John Herrmann** (Snohomish County); **Justin Greer** (United States Geological Survey); **Kathie Dionisio** (Environmental Protection Agency); **Katie Byrnes** (Washington Conservation Action); **Keith Estes** (Long Live the Kings); **Laurie Valeriano** (Toxic Free Future); **LeeAnn Racz** (ToxStrategies, LLC); **Marc Gauthier** (Upper Columbia United Tribes); **Marissa Paulling** (Northwest Indian Fisheries Commission); **Mary Rabourn** (King County); **Melissa Heintz** (ToxStrategies, LLC); **River Wan** (Pierce County); **Robert Campbell** (LANXESS Corporation); **Seth Book** (Skokomish Indian Tribe); **Shirlee Tan** (Public Health Seattle King County); **Stephanie Blair** (Washington State University - Puyallup); **Tracey Norberg** (U.S. Tire Manufacturers Association).

Washington State agency support staff in attendance:

Madison Bristol (Ecology); **Frances Bothfeld** (Ecology); **Holly Davies** (Health); **Elinor Fanning** (Health); **Amina Al-Tarouti** (Health); **Stephanie Gill** (Ecology); **Cassie Horton** (Ecology); **Mallory Little** (Health); **Richelle Perez** (Ecology); **Nathan Lubliner** (Ecology); **Craig Manahan** (Ecology); **Katie Pruitt** (Governor's Salmon Recovery Office); **Sandra O'Neill** (Fish and Wildlife); **Andrea Carey** (Fish and Wildlife); **Don Gourlie** (PSP); **Rhea Smith** (Ecology); **Tony Bush** (WSDOT); **Tanya Williams** (Ecology); **Lindsey Bineau** (Ecology); **Monica Cornell** (Ecology); **Lizzy Baskerville** (Ecology); **Blake Nelson** (Ecology); **Derek Rockett** (Ecology); **Amy Salamone** (Ecology).

Advisory Committee members not present:

Katherine Saluskin (Yakama Nation Tribal Health); **Catherine Gockel** (Environmental Protection Agency); **Amber Lewis** (Suquamish Tribe); **Caitlin Lawrence** (Washington State University – Puyallup); **Don McQuilliams** (City of Bellevue); **Dylan Ahearn** (Herrera); **HollyAnna Littlebull** (Yakama Nation); **Jen McIntyre** (Washington State University); **David Troutt** (Nisqually Indian Tribe); **Neil Smith** (Flexsys); **Alison Osullivan** (Suquamish Tribe); **Tanya Eison-Pelach** (Affiliated Tribes of Northwest Indians); **Taylor Aalvik** (Affiliated Tribes of Northwest Indians); **Kiersten Maxwell** (University of Washington); **Emily Gonzalez** (Puget Soundkeeper); **Greg Haller** (Northwest Indian Fisheries Commission); **Gabrielle Rigutto** (ChemFORWARD); **Sara Hutton** (GSI)

– U.S. Tire Manufacturers Association); **Sean Dixon** (Puget Soundkeeper Alliance); **Kenia Whitehead** (GSI -U.S. Tire Manufacturers Association); **Rebecca Cook** (STOI); **Steve Laing** (Trout Unlimited); **Vice Chairman Joshua Bagley** (Suquamish Tribe).

Guest attendees:

David Feifarek (ToxStrategies, LLC); **Nicole Mann**; **Jen Bare** (ToxStrategies, LLC); **Sarah Ogden** (Exeltech Consulting); **Julie Panko** (ToxStrategies, LLC); **Stephanie Kennedy** (ToxStrategies, LLC).

Meeting Notes

The meeting started at 10:02 a.m. with 57 people in attendance. We discussed the agenda with advisory committee members, finalized our April 17 meeting notes, and discussed our schedule and updates. We reviewed the phase 1 timeline and then discussed progress on Phase 1 recommendations. We shared that we were still making edits in the active copy of the recommendations document and invited committee members to view the working copy. We have since archived this document, [which you can access here](#).

We shared our current plans to add the action plan recommendations that are supported by a 25-27 budget package to the main body of the Legislative report. We will identify the other recommendations as scoping and upload them to our project webpage. Since our final meeting, we have also decided to add scoping recommendations as a bulleted list in the appendix of the Legislative report. The Legislative report will go through agency management review, government relations, and Governor's office review.

We finalized the meeting minutes captured from the meeting held on April 17, 2024. We asked members if we needed to make any corrections to the document. Advisory committee members did not raise any objections or concerns.

Next, we provided updates to phase 1 recommendations. Advisory committee members submitted final comments. We incorporated these comments and sent recommendations out to agency staff for further review. Additionally, we updated recommendations to make them more actionable.

Updates to Phase 1 Recommendations

We shared significant changes made to the following phase 1 recommendations.

- **Environmental justice recommendation**

We received input from committee members to establish a statewide 6PPD communications collaborative group. This collaboration will be a great framework to start a statewide communications effort. We will inform committee members when we get started on this communications collaborative. We encouraged members to contact us if they would like more information.

- **Tire industry fee program**

This recommendation was developed based on feedback received from committee members. We are scoping this recommendation as we determine authority and steps for implementation.

- **Tire removal program**

The Department of Natural Resources (DNR) submitted a recommendation that we will include in the Legislative report. A committee member asked whether tire piles mean subsurface tires in Puget Sound or something else. The committee member was curious about how/why tire pile removal may have been prioritized, especially over known issues like creosote piling removal where there are known and ongoing aquatic toxicity hazards.

We received this follow-up response from DNR after the meeting: Creosote removal still remains a top priority for our DNR Restoration Program, with active removal happening year-round. The Tire Removal Project is a result of our Restoration Program's recent expansion in staff and capacity due to the passage of the derelict structures bill and dedicated funding towards completing a pilot tire pile removal in the 23-25 biennium.

- **Ecotoxicology recommendations**

We have merged the following recommendations for clarity: 1) Mode of action of 6PPD and 6PPD-quinone on salmonid species; 2) Acute and chronic effects of 6PPD and 6PPD-quinone on non-salmonid species; and 3) Sublethal exposure effects of 6PPD and 6PPD-quinone on aquatic life.

- **Statewide toxics ecosystem observatory program**

We changed the title of this recommendation to: Provide long-term funding to support research and monitoring of toxics in the environment. Formalize a permanent Statewide Toxics Ecosystem Observatory program to build upon and complement existing priority toxics in salmonid waterways research. We also refined the recommendation, though the intent of this recommendation remains the same. Our goal is to set up more permanent projects that integrate planning and collaboration to better understand toxics in watersheds in collaboration with partner state agencies.

- **Human health recommendations**

We updated the titles of two of the Dept of Health recommendations: 1) Evaluate the potential for human health impacts of 6PPD due to consumption of aquatic species, including but not limited to salmonids, and 2) Investigate holistic effects on people's health resulting from salmon decline due to 6PPD and 6PPD-q.

- **Stormwater and transportation recommendations**

We updated the following stormwater and transportation recommendations, including updating titles to reflect changes to justifications.

We added this recommendation to the 2025-2027 funding request and the Legislative report: Provide a toolbox for 6PPD-q informed retrofit planning through regularly updating Ecology's stormwater guidance resources and creating supplementary communications materials. We have avenues in place (e.g., Stormwater Management Manuals and TAPE guidance) to accomplish these goals. We are looking into adding a toolbox for 6PPD-q to expand upon these avenues.

We made this recommendation more specific to Washington State emissions reduction programs instead of being general research into transportation impacts: Research the extent to which state programs intended to reduce vehicle miles traveled (VMTs) can reduce the volume of 6PPD and 6PPD-quinone released into highway stormwater.

We changed the intent of this recommendation to anticipate which permittees will feel impacts from the criteria adoption and to forecast future costs: Determine potential impacts from the proposed 6PPD-q Aquatics Life Toxics Criteria water quality standard recommendation.

We are still determining if the recommendation to revise requirements for using the statewide environmental vendor pool for 6PPD-q and contaminants of emerging concern recommendation falls under the authority of Department of Enterprise Services.

Phase 1 parking lot

We kept ideas in the phase 1 parking lot document and saved parking lot ideas for future work on the action plan.

Reflection and discussion report-out

Committee members met in small breakout groups to share their input on the phase 1 process. We encouraged groups to share their feedback on what they enjoyed about this experience, along with any input or suggestions that we should consider for subsequent phases of the action plan.

We reconvened as a larger group for the discussion report-out. Group facilitators summarized conversations from each small group discussion. We encouraged advisory committee members to reflect, respond, and share any additional feedback with the group. Below is input that advisory committee members shared in the breakout room discussions and with the group as a whole.

What did you like most about this process?

Committee members felt that we did a good job at managing the advisory committee and input throughout the process. They also felt the process was well-organized, communication was good, and the Teams platform worked well. A committee member shared that they appreciated the transparent, regular updates. Another member felt that we provided a supportive

environment and they felt comfortable sharing ideas. Members shared that they liked the diversity of the committee, collaborative environment, and they appreciated there was staff participation from Federal, State, and Tribal governments and organizations. A committee member appreciated that we provided the slide deck prior to the meetings (they used these presentations to update their management on where we were in the process).

Is there anyone not represented in the advisory committee that should be invited for the next phase?

Committee members thought that we should involve more industry (scrap tire processors and trucking) and federal agencies including Department of Defense, Bureau of Land Management, National Oceanic and Atmospheric Administration, and Federal Highway Administration. We were also encouraged to invite underserved communities, community-based organizations, public health community-based organizations (CBOs), non-profits, and ethnic media representatives to participate in the advisory committee. A committee member felt that we should invite individuals who work on behavior change efforts. We received input to consider inviting a representative from the European Union.

After all access issues were fixed, did you like using Microsoft Teams to engage with the committee and agencies?

Committee members expressed that Teams was a huge challenge for small companies and non-state government. Another advisory committee member suggested that we consider using Dropbox for the future.

What can we improve upon?

Members felt that it wasn't clear which recommendations would not be incorporated in the Legislative report. A committee member expressed there wasn't enough time to talk about the budget package (unclear what it's going to cost, where the money is coming from, and how the funding would be used). Several committee members shared they felt the process moved too quickly, which made it difficult for them to dedicate time to review and add input to the documents. Participants also expressed that it was unclear as to why certain comments were rejected or not fully incorporated in the documents. We also received input that members were not always clear about the next steps.

What are some things that you would like to see us do differently in the future to improve the overall experience of the advisory committee?

Advisory committee members shared they would like us to stagger subgroup meetings. A committee member felt that subgroups could have used more time to review materials. Members suggested that we create a consensus document in the future for reassurance that comments are incorporated or an explanation as to why a comment was not fully integrated. A member expressed there are so many different groups working on this issue and it's so fast. It may be helpful to create a list on who's working on what to ensure committee members know

who to contact. We also received input to provide a summary in the meeting minutes about what was discussed in breakout rooms.

How did you like the subgroup breakouts?

A participant felt that it was difficult to participate in various subgroups. Another member shared that they enjoyed the ability to break out into focus areas because it helped to provide a better understanding of the bigger picture.

Did we dedicate enough time in our meetings for subgroups to meet and further discuss recommendations?

Committee members felt that we did not dedicate enough time for subgroups to meet. A member recommended that we allow more time to write recommendations, and then even more time beyond that to revise recommendations in conversation with the advisory committee.

Did we dedicate enough time for committee members to provide input in the scoping documents?

A committee member expressed that we should have started the process in 2023. Several participants thought the process moved very quickly, which made it difficult to review and provide comments. Another member felt there was a lack of developing a big picture for the recommendations; a lack of prioritizing from the onset; and that the process felt too “mushy.” We received input from a committee member that they would have appreciated seeing the document as a whole earlier in the process. Another member indicated it was hard to work in the siloes of the groups at times without seeing how their section fit into the context of the full report.

How would you like to receive updates on the final recommendations? Email or meeting?

Several advisory committee members shared they would like to receive email updates in the future. A participant shared they would like for us to update everyone with slides.

Is there any final input that you would like to share about this process?

Advisory committee members asked us to prioritize acting on what we can do now to move policy and management actions forward. A member recommended that we hold discussions and think about how to structure expected timing of things that come out of Phase 1 versus the management needs of Phase 2. Another member felt that we should have incorporated a more flexible phase 1 timeline.

A committee member shared that some of our participants have a utility background in drinking and wastewater. The member felt that BMPs being explored are already widely used in the utility sector. The committee member thought it may be helpful to have someone with this expertise share information about those technologies and applications. We also received input to identify a place in Teams to share research, or a place to share peer reviewed work.

Do you have any questions or comments for us?

- Is there no public comment period?
 - Ecology response: There is no public comment period for the phase 1 scoping document and Legislative report although there will be a public comment opportunity later in the development of the action plan.

Outstanding Questions

Below we respond to outstanding questions or comments, including those received in previous meetings in which we indicated we would get back to you with a response at a later date. Please let us know if you still have an outstanding question you need an answer to.

- A committee member felt that recommendation number 11 was problematic and felt that we would struggle to understand 6PPD if we're only looking at accredited methods.
 - Recommendation 11: Continue to streamline new lab accreditation resources to expedite 6PPD-quinone methods accreditation for laboratories in Washington State.
 - **Ecology response:** Per Ecology Policy 22-02, any data used by Ecology for decision making has to come from an accredited laboratory. Waivers to this policy are considered on a project basis and, typically research projects are not used for decision making.
- A committee member shared input that recommendation number 14 should be done under the Safer Products for Washington program.
 - Recommendation 14: Continue to assess emerging science and research on human exposure pathways and potential health hazards of 6PPD and transformation products, including 6PPD-quinone (6PPD-q).
 - **Health response:** Recommendation 14 is specifically for the Department of Health to track emerging human health and exposure research and develop health communications including a webpage and community resources as indicated. Our research may also support and intersect with the collaborative work we do with Ecology under Safer Products for Washington, but these activities are not subsumed under Safer Products for Washington or led by Ecology.
- Another committee member felt that recommendation number 15 should be done under Safer Products for Washington program.
 - Recommendation 15: Assess the potential for 6PPD and transformation products to reach Washington drinking water sources.
 - **Health response:** Recommendation 15 is specifically for the DOH Office of Drinking Water to evaluate potential vulnerabilities in the drinking water systems they regulate. They may do this in collaboration with Water Quality at Ecology and other partners identified in the recommendation. It may be that there are findings that could be useful for the Safer Products for Washington program in

their work. Still, the effort and the findings are not part of Safer Products for Washington.

- A committee member thought recommendation number 19 should be done under Safer Products for Washington program. They also felt this was not the right place for an end-of-life issue.
 - Recommendation 19: Identify and prioritize product categories that contain PPDs of concern, with an initial focus on non-tire products and products made from recycled rubber tires as part of Safer Products for Washington.
 - **Ecology response:** We revised the language in the fourth paragraph to “Ecology and Health should use the available information on product use, the concentrations of PPDs in products, and potential for exposure to inform prioritization of possible priority products under Safer Products for Washington. The information collected on the uses and releases of PPD chemicals in products can also inform actions that we can propose in later phases of our action plan work.”
- A committee member stated that recommendation number 21 was revised entirely in a way that was not intended and would be harmful. They felt that incentives were needed for truly safer tires and products that don't use PPDs or other highly hazardous chemicals.
 - **Ecology response:** We agree. We changed recommendation number 21 back to the original title: Create incentives and invest in initiatives to identify sustainable chemistry and materials for use in tires and other products that use PPDs.

Next Steps

We will provide updates on any significant changes to the recommendations. We will send a link to the Legislative report when it is published in December. We'll communicate plans for the next phase of the action plan.

Action Items

- Reach out to us if you identify intersecting work where 6PPD could be incorporated.
- Feel free to share your ideas with us through email.
- We will provide updates on any significant changes made to the recommendations.
- We will share a link to the Legislative report when it is published in December.
- We will communicate the next phase of the action plan.