
**PAST, PRESENT AND FUTURE:
Persistent Bioaccumulative Toxins in San Francisco Bay**

**A report prepared by Lena Brook,
Healthy Bay Project Director at Clean Water Fund**

December 2002

Healthy Bay Project Recommendations

(1) We strongly urge the San Francisco Bay Regional Water Quality Control Board to link the monitoring requirements expected of dischargers who receive National Pollutant Discharge Elimination System (NPDES) permits with the Board's Regional Monitoring Program (RMP). RMP is currently incorporating emerging contaminants, such as PBDEs, into their research agenda yet their efforts focus solely on the current contaminant levels in the San Francisco Bay and its ecosystem. We propose that all NPDES permittees be required to monitor for discharges of any emerging contaminants that are incorporated into the RMP program.

(2) Bay Area cities and counties, with assistance from ABAG and other regional entities, should implement more consistent policy to encourage non-fossil fuel conversion among car and bus fleets, the purchase of dioxin-free paper products, stricter implementation of medical waste management and policies for alternatives to polyvinyl chloride building materials, as well as other dioxin reduction measures. Bay Area community groups have the capacity to assist in such efforts and should be involved in various decision-making processes.

(3) The State of California as well as local jurisdictions should provide more substantial support and resources toward dioxin reduction efforts and recommend feasible, timely solutions for local governments and agencies around San Francisco Bay.

(4) Industry incentives to reduce and eventually eliminate PBT pollution must be created.

(5) Efforts of regulatory agencies that manage air quality should be more effectively integrated with those that work primarily on water quality issues.

(6) As soon as funding becomes available, the Regional Water Quality Control Board should create a community right-to-know database, similar in purpose to the national Toxics Release Inventory, that will chronicle all known pollutant discharges to San Francisco Bay. Such a database would also enable the cumulative impacts of discharged pollutants to be ascertained and evaluated, rather than taking a contaminant-by-contaminant approach as is currently the case.

(7) Without a paradigm shift on a regulatory level toward a precautionary approach to protecting the water quality of San Francisco Bay, we will continue to find ourselves facing the challenge of cleaning up “legacy” pollution at an extremely high cost, both physical and social. Regulatory agencies with San Francisco Bay Area jurisdiction and local policymakers should prioritize the phase out of the use, production and disposal of persistent bioaccumulative toxins in the short term. Ample evidence on human and wildlife health effects should be coupled with comprehensive economic analyses that take into account the long-term societal costs of inaction in as well as short term cost to industry.