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Intervention Points: Governing Diffuse Contamination from Source to Sink

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Abstract: Diffuse contamination presents governance challenges that differ fundamentally from those posed by point-source pollution. Unlike industrial discharges that can be permitted, monitored, and enforced at identifiable locations, diffuse contaminants arise from countless dispersed sources, travel through complex environmental pathways, and manifest their effects far from their origins. This article develops an intervention-point framework for understanding and governing diffuse contamination, arguing that effective responses require strategic action across multiple stages of the contaminant pathway rather than concentration on any single control measure. Drawing on recent research on tire-derived contaminants, nanomaterial remediation, and photocatalytic treatment, the analysis identifies four intervention points—source control, transport interception, treatment at concentration, and end-of-pipe removal—each with distinct technical possibilities, governance requirements, and equity implications. The framework is applied to the case of 6PPD-quinone, a tire transformation product that has emerged as a paradigmatic diffuse contaminant, to illustrate how intervention-point thinking can inform strategy. The analysis reveals that current approaches tend to over-rely on end-of-pipe treatment while neglecting upstream opportunities for source reduction and transport interruption. Rebalancing intervention portfolios requires policy frameworks capable of coordinating action across scales, sectors, and jurisdictions, as well as technologies appropriate to each intervention point. The article concludes by proposing a research agenda for intervention-point governance and discussing implications for regulatory design.

Keywords: *diffuse pollution, 6PPD-quinone, intervention points, environmental governance, nano-biochar, photocatalysis, source control*

1. Introduction

The history of environmental regulation has been shaped, to a remarkable extent, by the characteristics of pollution sources. When contamination originates from identifiable locations—a factory outfall, a municipal wastewater treatment plant, a landfill—regulatory frameworks can require permits, set discharge limits, monitor compliance, and impose penalties for violations. The point-source paradigm, codified in laws such as the U.S. Clean Water Act and the European Union's Industrial Emissions Directive, has achieved substantial reductions in pollutant loads from industrial and municipal sources over the past half-century.

Yet the most pressing contamination challenges of the present era do not fit neatly within the point-source framework. Contaminants increasingly originate from diffuse sources—vehicle traffic, agricultural fields, building materials, consumer products—that cannot be

permitted or monitored in the traditional sense. These substances travel through environmental pathways that cross jurisdictional boundaries, media (air, water, soil), and scales, arriving at locations far removed from their origins. Their effects are often chronic rather than acute, manifesting through subtle ecological changes or long-latency human health impacts that are difficult to attribute to specific causes.

The governance of diffuse contamination thus presents a fundamentally different challenge than the regulation of point sources. It requires action across multiple stages of the contaminant pathway, from the initial release of pollutants to their ultimate fate in receiving environments. It demands coordination across sectors (transportation, agriculture, manufacturing), scales (local, regional, national, international), and actors (governments, industry, consumers). And it confronts the

reality that the most effective interventions are often those that occur furthest upstream—preventing contamination at its source rather than treating it after release—even though such interventions may be politically and economically difficult to implement.

This article develops an intervention-point framework for governing diffuse contamination. The framework identifies four broad stages at which interventions can occur—source control, transport interception, treatment at concentration, and end-of-pipe removal—and analyzes the technical possibilities, governance requirements, and equity implications of each. The analysis draws on recent research on tire-derived contaminants, particularly 6PPD-quinone, as well as advances in nano-biochar adsorbents and photocatalytic treatment systems, to illustrate how the framework applies in practice. The central argument is that effective governance of diffuse contamination requires strategic action across multiple intervention points rather than concentration on any single control measure. Current approaches tend to over-rely on end-of-pipe treatment while neglecting upstream opportunities that may be more effective, more equitable, and more sustainable.

2. The Anatomy of Diffuse Contamination

2.1 From Point to Diffuse Sources

The distinction between point and diffuse sources is not merely technical but has profound implications for governance. Point sources are characterized by identifiable locations, discrete discharges, and measurable flows. They can be regulated through permits that specify allowable concentrations or loads, monitored through sampling at outfalls, and enforced through penalties for exceedances. The regulatory apparatus developed for point sources assumes that pollution can be traced to its origin, that responsibility can be assigned, and that compliance can be verified.

Diffuse sources violate every one of these assumptions. They are distributed across landscapes and populations rather than concentrated at specific locations. Their discharges are continuous and cumulative rather than discrete and measurable. Their contributions to contamination cannot be attributed to individual actors in any straightforward way. A single vehicle's tire wear, a single farmer's fertilizer application, a single building's paint—each contributes infinitesimally to the overall problem, yet collectively they generate contamination at scales that exceed the capacity of any single control measure to address.

The governance implications of diffuseness are substantial. Regulatory tools designed for point sources—permits, discharge limits, compliance monitoring—do not translate readily to diffuse pollution. Alternative approaches are required: economic instruments that internalize externalities, product standards that address contamination at the design stage, land-use planning that shapes the spatial distribution of

potential sources, and voluntary programs that engage actors in shared responsibility for outcomes.

2.2 Pathways and Transformations

Diffuse contaminants travel through environmental pathways that are complex, interconnected, and often poorly understood. The same substance may be released to air, water, or soil, may transform through chemical or biological processes, may accumulate in organisms or sediments, and may exert effects at locations and times far removed from its point of origin. Understanding these pathways is essential for designing effective interventions, yet the science of contaminant fate and transport remains incomplete for many substances of concern.

The case of 6PPD-quinone illustrates the complexity of contaminant pathways. The story begins with 6PPD, a chemical added to tires to prevent degradation by ozone. When tires wear during normal vehicle operation, tiny particles containing 6PPD are released to road surfaces. These particles may be washed into stormwater systems, deposited on adjacent land, or transported through the air. Once in the environment, 6PPD reacts with ozone—a common air pollutant—to form 6PPD-quinone, a compound with dramatically different properties and toxicity (Gu et al., 2025).

The pathway from tire to stream to fish involves multiple stages, each offering potential intervention points. Source control might involve reformulating tires to eliminate 6PPD or substitute a less harmful alternative. Transport interception might capture tire wear particles before they reach waterways, through street sweeping, stormwater detention, or green infrastructure. Treatment at concentration might remove 6PPD-quinone from stormwater before discharge. End-of-pipe removal might target the compound in receiving waters, though at concentrations that make treatment technically challenging and economically costly.

2.3 The Attribution Problem

One of the defining characteristics of diffuse contamination is the difficulty of attribution. When contamination occurs, who is responsible? The manufacturer who produced the chemical? The consumer who used the product? The municipality that failed to treat stormwater? The regulator that permitted the chemical's use? In legal and political terms, diffuse contamination creates a responsibility vacuum that is difficult to fill.

The attribution problem has both practical and normative dimensions. Practically, it complicates enforcement: without identifiable responsible parties, traditional regulatory mechanisms lose their grip. Normatively, it raises questions of justice: who should bear the costs of cleanup and prevention when the benefits of the contaminating activities are widely distributed?

These questions have no easy answers. But they suggest that governance of diffuse contamination must move

beyond the model of assigning responsibility to individual actors and toward frameworks that acknowledge collective responsibility and shared obligation. This may involve industry-wide standards rather than facility-specific permits, product stewardship requirements that place responsibility on manufacturers throughout the product lifecycle, and public funding for remediation where responsible parties cannot be identified.

3. Intervention Points: A Framework for Analysis

3.1 Source Control

The most direct approach to diffuse contamination is to prevent it at its source—to eliminate or reduce the release of contaminants before they enter environmental pathways. Source control can take multiple forms: product reformulation that substitutes less harmful chemicals for those of concern, process changes that reduce waste generation, and consumption changes that reduce demand for contaminating products.

For 6PPD-quinone, source control would involve reformulating tires to eliminate 6PPD or substitute a less toxic antiozonant. This approach has the advantage of addressing the problem at its root, eliminating the need for downstream interventions. However, it faces significant obstacles. Alternatives to 6PPD must be effective, affordable, and safe. They must be compatible with tire manufacturing processes and performance requirements. And they must be adopted across an industry that is global, competitive, and resistant to regulation.

Source control also raises questions of timing and transition. Even if 6PPD were banned today, tires containing the chemical would remain in use for years, continuing to release it as they wear. The environmental legacy of past production would persist long after source control measures took effect. This temporal dimension is often overlooked in discussions of source control, which tend to focus on preventing future releases while neglecting ongoing contributions from existing stocks.

3.2 Transport Interception

Between source and receptor, contaminants travel through environmental pathways that offer opportunities for interception. Transport interception seeks to capture or divert contaminants before they reach sensitive receiving environments, reducing the load that must be addressed through treatment or remediation.

For tire-derived contaminants, transport interception might involve street sweeping to remove tire wear particles from road surfaces, stormwater detention basins that allow particles to settle, or green infrastructure such as bioswales and constructed wetlands that filter runoff. These approaches can be effective at reducing contaminant loads to waterways, but their performance depends on factors—rainfall patterns, maintenance practices, land availability—that vary across contexts.

Transport interception raises its own governance challenges. Street sweeping is a municipal responsibility in many jurisdictions, but municipalities may lack the resources or political will to maintain effective programs. Stormwater detention requirements may apply to new development but not to existing infrastructure. Green infrastructure requires space that may be unavailable in dense urban areas. And the effectiveness of interception measures is often difficult to verify, making accountability problematic.

3.3 Treatment at Concentration

Where contaminants have been captured or concentrated, treatment technologies can remove or destroy them before they are released to the environment. Treatment at concentration is the traditional domain of environmental engineering, encompassing processes such as adsorption, oxidation, membrane filtration, and biological degradation.

Nano-biochar represents a promising material for treatment at concentration, offering high adsorption capacities for heavy metals and organic contaminants that exceed those of conventional adsorbents (Pathak et al., 2024). Its production from waste biomass supports circular economy principles, and its tunable surface chemistry allows targeting of specific contaminants. However, nano-biochar's application to diffuse contaminants faces challenges: the low concentrations typical of stormwater require large volumes of adsorbent, while the presence of competing ions and natural organic matter can reduce adsorption efficiency.

Photocatalytic treatment offers an alternative approach, using light-activated semiconductors to generate reactive oxygen species that oxidize organic contaminants (Huang et al., 2025). Photocatalysis has the advantage of destroying contaminants rather than merely transferring them to a solid phase, avoiding the need for adsorbent regeneration or disposal. However, it faces its own limitations: low quantum efficiencies, catalyst deactivation, and the challenge of treating large volumes at low concentrations.

3.4 End-of-Pipe Removal

The final intervention point is removal of contaminants from receiving environments—rivers, lakes, estuaries, and coastal waters—after they have been released. End-of-pipe removal is the least preferred option from a pollution prevention perspective, since it addresses contamination after environmental damage may already have occurred. Yet in many cases, it is the only available option for legacy contaminants or for substances that cannot be controlled at source.

End-of-pipe removal of 6PPD-quinone from receiving waters is technically challenging and economically costly. The compound occurs at trace concentrations that challenge analytical detection and treatment removal. The volumes of water requiring treatment—entire river systems or coastal zones—are enormous. And the

ecological receptors most sensitive to the compound—coho salmon, for example—may be affected before treatment can be implemented.

These limitations suggest that end-of-pipe removal should be viewed as a last resort rather than a primary strategy. Yet current governance frameworks often default to end-of-pipe approaches because they are most compatible with existing regulatory structures and institutional capacities. Rebalancing intervention portfolios toward upstream measures requires rethinking the frameworks through which diffuse contamination is governed.

4. Case Analysis: 6PPD-Quinone Governance

4.1 The Contaminant Profile

6PPD-quinone provides an instructive case for intervention-point analysis. The compound is formed when 6PPD, a tire antiozonant used for decades, reacts with ozone in the environment. Its toxicity to certain fish species—particularly coho salmon, for which exposure to urban runoff can cause near-total mortality—has been documented in field studies and confirmed in laboratory experiments (Gu et al., 2025).

The environmental concentrations of 6PPD-quinone vary widely, reflecting differences in traffic density, stormwater management, and receiving water characteristics. Concentrations in urban runoff can reach levels well above toxicity thresholds for sensitive species, while concentrations in larger receiving waters are typically lower due to dilution. Detection frequencies are high in urban areas, with the compound found in stormwater, rivers, and coastal waters across multiple continents.

4.2 Intervention Options

Applying the intervention-point framework to 6PPD-quinone reveals a range of options with different characteristics.

Source control options include reformulation of tires to eliminate 6PPD or substitute alternatives. This approach has received increasing attention following the discovery of 6PPD-quinone's toxicity, with some tire manufacturers exploring alternatives and regulators considering restrictions. However, the transition would take years to complete, and the environmental legacy of existing tires would persist for decades.

Transport interception options include enhanced street sweeping, stormwater detention, and green infrastructure. These measures can reduce the load of tire wear particles reaching waterways, but their effectiveness depends on maintenance and their coverage is limited by land availability and infrastructure constraints.

Treatment at concentration options include adsorption using nano-biochar or other materials, oxidation using photocatalytic or chemical processes, and membrane filtration. These approaches can achieve high removal efficiencies under controlled conditions but face

challenges when applied to the large volumes and variable conditions characteristic of stormwater.

End-of-pipe removal options are limited by the difficulty and cost of treating large water bodies. While some treatment may be feasible at stormwater outfalls or in detention basins, treating entire rivers or estuaries is impractical.

4.3 Governance Implications

The 6PPD-quinone case illustrates the governance challenges of diffuse contamination. Responsibility for the problem is distributed across multiple actors—tire manufacturers, vehicle owners, road authorities, stormwater managers, and regulators—none of whom can solve it alone. The most effective interventions, such as tire reformulation, require action at the national or international level, while other measures, such as street sweeping, are inherently local. Coordinating action across these scales and actors is difficult.

The case also highlights the importance of timing. 6PPD has been used in tires for decades, and its transformation product has been accumulating in the environment for just as long. Even if source control measures were implemented immediately, the environmental legacy would persist. This temporal dimension complicates governance: it requires simultaneously addressing future releases and past contamination, while recognizing that the two problems have different characteristics and may require different responses.

Finally, the case raises questions of equity. The burden of 6PPD-quinone contamination falls disproportionately on aquatic ecosystems and the communities that depend on them, while the benefits of tire use are widely distributed. This distributional mismatch raises questions about who should bear the costs of prevention and remediation, and how those costs should be allocated.

5. Rebalancing Intervention Portfolios

5.1 The Upstream Imperative

The intervention-point framework suggests that governance of diffuse contamination should prioritize upstream measures—source control and transport interception—over downstream treatment. This conclusion follows from several considerations.

First, upstream measures address contamination before it enters environmental pathways, avoiding the environmental damage that occurs during transport and before treatment can be implemented. Second, upstream measures are often more cost-effective, since they avoid the need for expensive treatment infrastructure and the ongoing costs of operation and maintenance. Third, upstream measures distribute responsibility more equitably, placing obligations on producers and users of contaminating products rather than on downstream communities that may have little connection to the sources of contamination.

However, upstream measures face significant political and economic obstacles. They often require regulation of industry, which faces resistance from affected sectors. They may impose costs on consumers, raising concerns about affordability and competitiveness. And they require coordination across multiple actors and scales, which is difficult to achieve in fragmented governance systems.

5.2 The Role of Materials and Technologies

Advances in materials science and environmental engineering can support intervention at multiple points along the contaminant pathway. Nano-biochar and other engineered adsorbents offer enhanced performance for treatment at concentration, potentially reducing the cost and increasing the effectiveness of stormwater treatment (Pathak et al., 2024). Photocatalytic systems can destroy organic contaminants without generating residual waste, offering advantages over adsorption-based approaches (Huang et al., 2025).

However, the development of treatment technologies should not become a substitute for upstream intervention. If the availability of effective treatment creates a perception that contamination can be managed after release, it may reduce pressure for source control and transport interception. The goal should be to deploy treatment where it is most appropriate while continuing to pursue upstream measures that reduce the need for treatment.

The materials used in remediation also raise questions about their own environmental impacts. Nano-biochar production requires energy and may involve chemical modification, generating environmental burdens that offset the benefits of contaminant removal. Photocatalysts containing precious metals have significant embodied impacts from mining and refining. Evaluating these trade-offs requires life cycle assessment that considers the full range of environmental effects.

5.3 Coordination Across Scales and Sectors

Effective intervention-point governance requires coordination across multiple scales and sectors. Source control may require national or international regulation of chemicals and products. Transport interception is typically a local responsibility, requiring coordination among municipal departments and with regional and state authorities. Treatment at concentration may involve regional infrastructure and specialized expertise. End-of-pipe removal requires coordination at watershed or coastal scales.

Achieving such coordination is difficult in fragmented governance systems where responsibilities are divided among multiple agencies and levels of government. It requires mechanisms for information sharing, joint planning, and collective decision-making that are often absent. It also requires overcoming the tendency of institutions to focus on their own domains rather than the systemic problem.

6. Implications for Policy and Research

6.1 Policy Implications

The intervention-point framework has several implications for environmental policy.

First, policy should be designed to address contamination across the full pathway, not just at the point of release or the point of treatment. This means integrating source control, transport interception, and treatment into coherent strategies rather than addressing them separately.

Second, policy should prioritize upstream measures that prevent contamination rather than relying on downstream treatment. This may require reallocating resources from treatment infrastructure to prevention programs, and developing regulatory tools appropriate to diffuse sources.

Third, policy should recognize the temporal dimensions of contamination. The environmental legacy of past releases will persist regardless of current prevention efforts, and governance must address both ongoing releases and historical contamination.

Fourth, policy should engage multiple actors across scales and sectors. Diffuse contamination cannot be addressed by any single agency or level of government; it requires coordinated action across the full range of relevant actors.

6.2 Research Priorities

The intervention-point framework also suggests priorities for research.

Research is needed on the effectiveness of different interventions under realistic conditions. While laboratory studies provide valuable data on the performance of treatment technologies, field studies are needed to evaluate performance under the variable conditions characteristic of real-world applications.

Research is needed on the pathways and transformations of diffuse contaminants. Understanding how contaminants travel through environmental systems, how they transform, and where they accumulate is essential for designing effective interventions and predicting their effects.

Research is needed on the governance of diffuse contamination. This includes studies of how regulatory frameworks can be adapted to address diffuse sources, how coordination across scales and sectors can be achieved, and how equity considerations can be integrated into intervention design.

Research is needed on the life cycle impacts of remediation technologies. As with any environmental intervention, remediation has its own environmental footprint. Understanding these impacts is essential for determining whether remediation represents a net environmental benefit.

7. Conclusions

The governance of diffuse contamination represents one of the most challenging tasks facing environmental policy in the twenty-first century. The frameworks developed for point-source pollution do not translate readily to contaminants that originate from countless dispersed sources and travel through complex environmental pathways. New approaches are needed that address contamination across the full pathway from source to sink.

This article has developed an intervention-point framework for analyzing and designing responses to diffuse contamination. The framework identifies four intervention points—source control, transport interception, treatment at concentration, and end-of-pipe removal—and analyzes the characteristics, possibilities, and limitations of each. Applying the framework to the case of 6PPD-quinone reveals that effective governance requires strategic action across multiple intervention points rather than concentration on any single measure. It also reveals that current approaches tend to over-rely on downstream treatment while neglecting upstream opportunities for prevention and interception.

Rebalancing intervention portfolios toward upstream measures requires overcoming significant political, economic, and institutional obstacles. It requires regulatory frameworks capable of addressing diffuse sources, coordination mechanisms that span scales and sectors, and technologies appropriate to each intervention point. It also requires sustained commitment to prevention even when treatment appears easier or more immediately effective.

The stakes are high. Diffuse contaminants such as 6PPD-quinone are accumulating in ecosystems, and their effects on wildlife and human health are only beginning to be understood. The longer action is delayed, the greater the environmental legacy that future generations will inherit. Acting now, with strategies that address the full pathway from source to sink, offers the best hope of protecting ecosystems and communities from the harmful effects of diffuse contamination.

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