Spokane River Regional Toxics Task Force (SRRTTF)

First Draft Work Plan

September 4, 2012

INTRODUCTION/BACKGROUND

The Spokane River Regional Toxics Task Force (SRRTTF) has been formed through the execution of a Memorandum of Agreement (MOA), as required by permit conditions in the NPDES permits for the Washington Spokane River wastewater dischargers. The overarching goal for the SRRTTF is to develop a comprehensive plan to bring the Spokane River into compliance with applicable water quality standards for PCBs. The MOA identifies a goal of developing a work plan for the years 2012 through 2016 by the end of December 2012. The MOA indicates that the work plan should address the following work elements:

1. Approach for and analysis of existing data on PCB and other toxics on the Washington 2008, Category 5, § 303(d) list to (1) understand what is known, (2) identify data gaps, and (3) determine where additional characterization of amounts, sources and locations is needed.
2. Development and implementation of a Monitoring Plan for the Spokane River that, (1) establishes the baseline conditions for PCBs and the other identified toxics, (2) monitors and assesses the effectiveness of toxic reduction measures, and (3) can be adapted to take into account newly generated data and sampling techniques.
3. Identification or establishment of a publicly accessible clearinghouse for storing data, reports, Task Force meeting minutes or summaries, and other information gathered or developed by the Task Force and its members.
4. Review of proposed Toxic Management Plans, Source Management Plans, and BMPs.
5. Approach for preparing recommendations to control and reduce point and nonpoint sources of PCBs and other toxics, on the Washington 2008, Category 5, 303 (d) list, to the Spokane River.
6. Public education needs and approach, including pollution prevention and public and environmental health determinations.

This document, once approved by the SRRTTF members, will constitute the First Draft Work Plan for the Spokane River Regional Toxics Task Force.

WORK PLAN DEVELOPMENT PROCESS

The work plan is meant to be a dynamic living document, which will be an effective management tool to be used by the SRRTTF toward accomplishing the goals of the SRRTTF. As such, the work plan will evolve and become more detailed and specific as the task force learns more about PCBs in the Spokane River. There will be at least three levels of work plan development adopted by the SRRTTF:

- First Draft Work Plan—This document is the first draft of the work plan, and is a high level description of the work element activities that are anticipated for the SRRTTF. It does not have the benefit of input from the yet-to-be hired SRRTTF technical consultant (referred to as a technical advisor in the MOA) regarding the specific approaches to the work elements.
- Technical Consultant Work Plan—The Technical Consultant Work Plan will be developed after the technical consultant has been hired, and when a detailed scope of work has been negotiated with the technical consultant. The Technical Consultant Work Plan will be specific and detailed regarding the review of existing data and analysis, the approach to identifying data gaps, and the approach to collecting additional data necessary to characterize and quantify PCBs in the Spokane River.
- Annual Work Plan Update—The Technical Consultant Work Plan will be formally revised and adopted annually by the SRRTTF, based on new information gained during the previous year. After sufficient data has been gathered, and PCBs have been characterized and quantified, the annual updated work plans will provide details related to assessing Best Management Practices (BMPs), development of plans for implementation of reduction measures, effectiveness monitoring, and other appropriate implementation tracking measures.

WORK PLAN ELEMENTS

The MOA identifies six work plan elements, which will be addressed in this First Draft Work Plan. Subsequent revisions to the work plan may result in addition of work plan elements, or consolidation of work plan elements, as appropriate.

<u>Work Plan Element 1.—Data review, data gap evaluation, analysis, and implementation plan</u>

Initially, all existing PCB data for the Spokane River watershed will be collected and reviewed by the SRRTTF technical consultant for quality, accuracy, applicability, and for use in future PCB analytical models.

After reviewing existing data and other available information on PCBs in the Spokane River, the technical consultant will develop a recommended analytical modeling

approach that will be used to characterize and quantify PCBs in the Spokane River watershed. The analytical model will be used to characterize sources and sinks of PCBs in the watershed, and shall accommodate the seasonal variability in watershed runoff conditions. The analytical model will be capable of being refined over time as new information becomes available. The analytical model shall also complement and be compatible with the monitoring plan that is defined under Work Element 2 below.

Based on the review of data, and on the recommended analytical modeling approach, the technical consultant will provide an assessment of data gaps, and will address the adequacy of the existing data for performing the analytical work to characterize and quantify PCBs in the Spokane River.

The recommended analytical modeling approach and proposal for additional data collection will be reviewed and approved by the SRRTTF members prior to execution of the following work elements.

Based on the Data Gaps Analysis, the technical consultant will prepare a recommended sampling and analysis plan for quantification and characterization of PCBs throughout the Spokane River watershed, including results by specific appropriate Spokane River segments. The outcome will lead to an inventory of sources and sinks by source category, by watershed geographic areas, and by river segments starting at the outlet of Lake Coeur d'Alene, and progressing downstream to the initial boundary of the jurisdiction of The Spokane Tribe of Indians.

The technical consultant will prepare a Quality Assurance Project Plan (QAPP) that documents the sampling and analysis plan, sample collection methods, analytical protocols, and data management, to ensure that all resulting data is of adequate and consistent quality for use in the analytical modeling efforts. The QAPP will be submitted to the SRRTTF for review and approval, and then to Ecology for review and approval.

Then the sampling and analysis plan will be undertaken and completed.

Following the collection of a sufficient data set to perform a scientifically defensible analysis to quantify and characterize PCBs in the Spokane River watershed, the technical consultant will perform the analysis in accordance with the previously approved analytical methodology.

The outcome of the analysis will be a detailed inventory of sources and sinks by source category, by watershed geographic areas, and by river segments starting at the outlet of Lake Coeur d'Alene, and progressing downstream to the initial boundary of the jurisdiction of The Spokane Tribe of Indians.

Following the analysis, a comprehensive plan will be prepared that quantifies and characterizes PCBs, and recommends an implementation plan for measures (BMPs) to reduce PCBs in the Spokane River watershed.

Work Plan Element 2.—Development and implementation of a Monitoring Plan

The Technical Consultant will prepare a recommended monitoring plan for establishing a baseline for PCBs and a system for monitoring PCBs over time to assess the effectiveness of source reduction efforts in the Spokane River watershed. The baseline condition in the Spokane River watershed will be determined based on a combination of existing data and additional data collected to fill in the data gaps. The monitoring plan will recommend how to divide the watershed into regions, how to divide the Spokane River into segments, and frequency of monitoring for purposes of long term tracking.

Routine PCB monitoring conducted by agencies, wastewater dischargers and The Spokane Tribe of Indians will be considered when developing the Monitoring Plan. It is assumed that multiple parties will assume responsibility for implementing elements of the monitoring plan.

Work Plan Element 3.—Establish a publicly accessible information clearing house

The following scope of work is included in the Ecology contract with the Ruckelshaus Center, who has been retained to perform facilitation for the SRRTTF.

> *"Facilitate the development of standards for maintenance of the Task Force web page. Set up an independent web page on behalf of the Task Force that is transferable. Manage and update the web page in accordance with the standards. Ensure that the web page is an effective public communications tool, and is a timely representation of Task Force activities."*

For purposes of this First Draft Work Plan, it is assumed that this scope of work will satisfy Work Plan Element 3.

Work Plan Element 4.—Review of Toxic Management Plans, Source Management Plans, and BMPs

Each Washington NPDES permittee with a discharge into the Spokane River has a permit condition requiring the permittee to prepare a Toxics Source Control Action Plan. The goals of the plans are to (1) reduce toxicant loadings, including PCBs, to the Spokane River to the maximum extent practicable realizing statistically significant reductions in the influent concentration of toxicants to the treatment facility of the next 10-years, and (2) reduction of PCBs in the treatment facility effluent to the maximum extent practicable so that in time the effluent does not contribute to PCBs in the Spokane River exceeding applicable water quality standards.

To meet these permit conditions, each discharger will undertake certain measures to quantify PCBs and PCB sources in their collection system, and will identify Best Management Practices (BMPs) to reduce or eliminate PCB sources. An annual Toxics Management Report will be prepared by each discharger and submitted to the Washington State Department of Ecology.

The SRRTTF and their technical consultant will review these activities and annual reports in the context of the work that the SRRTTF is performing in the Spokane River watershed, and provide feedback. The goal will be to achieve the highest possible level of consistency and coordination between the efforts of the task force and the permittees to maximize the effectiveness of the PCB reduction programs. The SRRTTF will not oversee or dictate the NPDES compliance efforts by the permittees, but may offer suggestions in the spirit of regional collaboration.

Work Plan Element 5.—Develop strategy for reduction of point sources and non-point sources of PCBs

PCBs were banned from production in 1976 under the Toxic Substance Control Act (TSCA). It was widely believed that TSCA would end the production or presence of new PCBs. However, the fact is that under TSCA, new products may contain concentrations of PCBs, including inadvertently generated PCBs, that are less than an average of 25 parts per million (PPM), with a 50 ppm maximum. There are believed to be more than 200 products in use today containing PCBs approaching these allowable limits.

The SRRTTF will develop a strategy and take measures to encourage the United States Environmental Protection Agency (EPA) to amend the TSCA regulations to fully eliminate PCBs from products manufactured in the United States and from products imported into the United States. As an initial measure, SRRTTF members have brought this to the attention of The Environmental Council of the States (ECOS), who have adopted a resolution that will be sent to EPA. Other organizations that should be targeted for adoption of similar resolutions include the Water Environment Federation, the Association of American Metropolitan Sewerage Associations, and the National Association of Clean Water Agencies.

In addition, a strategy for bringing this to the attention of federal congressional delegates will be developed and implemented.

Reduction of point sources and nonpoint sources of PCB will also be identified by Washington NPDES permittees, as part of their individual permit requirements, within their wastewater systems. The SRRTTF and its technical consultant will be able to review the reduction strategies developed by the permittees.

Considering the PCB sources and sinks identified from implementation of Work Plan Element 1, and the PCB reduction efforts by various parties in the Spokane River watershed, the SRRTTF technical consultant will develop a strategy for reducing PCBs in the Spokane River.

Work Plan Element 6.—Develop strategy and measures for public education

The SRRTTF, with the assistance of the technical consultant, will undertake a program to identify commonly used products that may contain PCBs, which could be released into our environment. Then, a public education campaign will be developed to utilize broadcast media, print media, direct mailings, and other public education opportunities to inform our citizens about the effects of PCBs on public health, and on measures that the average citizen can adopt to reduce the amount of PCBs in our environment. The public education materials will include public service announcements as well as printed materials. All public education materials will be approved by the SRRTTF prior to their use.

After BMPs have been identified to reduce PCB sources in the Spokane River watershed, and a BMP implementation plan has been prepared and adopted by the SRRTTF, a public education campaign will be developed to inform the public about the PCB loadings in the watershed, and on the implementation measures that are proposed.

WORK PLAN MILESTONE GOALS

(Work Plan Milestone Goals are yet to be established and inserted into this First Draft Work Plan)