

Spokane River Regional Toxics Task Force (SRRTTF)
Definition of “Measurable Progress”
for the Purposes of
NPDES Special Permit Conditions requiring a “Regional Toxics Task Force”
Discussion Draft 10-05-2012

INTRODUCTION

In 2011, the Washington State Department of Ecology (Ecology) issued NPDES permits to the following five (5) Permittees with discharges into the Spokane River: Liberty Lake Sewer and Water District, Kaiser Aluminum, Inland Empire Paper Company, the County of Spokane, and the City of Spokane. Ecology included Special Permit Condition S. ## “**Regional Toxics Task Force**” in each NPDES permit which requires participation in the creation and functions of a Regional Toxics Task Force. The permits also stipulate that “If Ecology determines that the Task Force is failing to make measurable progress toward meeting applicable water quality criteria for PCBs, Ecology would be obligated to proceed with development of a TMDL in the Spokane River for PCBs or determine an alternative to ensure water quality standards are met.”

During the period 2011 to the fourth quarter of 2012, the SRRTTF has made the following substantial measurable progress: established the SRRTTF, established a business entity, secured an independent facilitator, started the funding of SRRTTF activities, and conducted other related work activities toward meeting the goals of the SRRTTF.

PURPOSE FOR THIS DOCUMENT

The NPDES permits do not contain a formal definition of “measurable progress”. Ecology will be re-issuing the NPDES permits in 2016. To provide more clarity to Ecology and the NPDES permittees, this document is intended to define the metric that will be used to determine whether measurable progress has been made during the permit period 2011 to 2016.

DEFINITION OF THE METRIC TO BE USED TO DETERMINE MEASURABLE PROGRESS

From the fourth quarter of 2012 to 2016, the SRRTTF will conduct a variety of work activities as outlined in the SRRTTF First Draft Work Plan. Provided that the SRRTTF is progressing with and accomplishing the work activities included in the First Draft Work Plan, or subsequent revisions thereof, the SRRTTF will be deemed to be making measurable progress. It is recognized that the schedule included in the First Draft Work Plan is a general guidance toward meeting the SRRTTF goals, and that the schedule for individual work activities may deviate from the initial schedule based on subsequent information and SRRTTF Decisions. Deviations from the schedule in the First Draft Work Plan, or subsequent work plans, may be deemed to be within the definition of measurable progress, and will not be a sole factor leading to a determination that the SRRTTF is failing to make measurable progress.