

# Spokane River Regional Toxics Task Force

Facilitated by the William D. Ruckelshaus Center (Chris Page and Kara Whitman)

**DRAFT** Summary Notes

Wednesday, June 24, 2015 | 9:00am-12:30pm

Liberty Lake Sewer and Water District Office | 22510 E. Mission Avenue Liberty Lake, WA 99019

## Attendees

*Voting Members and Alternatives (\*Denotes Voting Members)*

Tom Agnew \*, Bijay Adams – Liberty Lake Sewer and Water District  
Dale Arnold\*(*phone*), Jeff Donovan, Lynn Schmidt – City of Spokane  
Galen Buterbaugh\* – Lake Spokane Association  
Kris Holm (*phone*) – City of Coeur d’Alene  
Doug Krapas\*, Ryan Ekre – Inland Empire Paper  
Bud Leber\* – Kaiser Aluminum  
Mike LaScuola\* – Spokane Regional Health District  
Dave McBride\*(*phone*) – Washington Department of Health  
Dave Moss\*, Bruce Rawls – Spokane County  
Jerry White\* – RiverKeeper

## *Advisors*

Jim Bellatty, Adriane Borgias, Will Hobbs (*phone*), Brandee Era-Miller (*phone*), Jeremy Ryf – WA Dept. of Ecology (Ecology)  
Kevin Booth – Avista  
Brian Nickel (*phone*) – U.S. Environmental Protection Agency (EPA)  
Dan Redline – Idaho Department of Environmental Quality

## *Public*

Henry Allen – City of Spokane Valley  
John Beacham – City of Post Falls  
Adrienne Cronebaugh – Kootenai Environmental Alliance  
Lisa Dally Wilson – Dally Environmental  
Dave Dilks (*phone*) – LimnoTech  
Greg Lahti – Washington Department of Transportation (DOT)  
Jared Webley – Gallatin Public Affairs  
Steve Krueger (*phone*) – Department of Enterprise Services

## **Introductions, Agenda Review, Approval of Prior Meeting Summaries**

After a round of introductions, Chris Page went over the agenda; no changes were made. The Task Force accepted the May 27, 2015 meeting summary notes with minor changes:

- John Whalen is WDFW Eastern Region Fisheries Manager and he will serve as liaison to the task force on fish hatchery issues.
- Second paragraph- The WDFW fish health specialist is Steve Roberts who will be a good contact for the Task Force on PCB/Fish Food issues

**ACTION ITEM:** Ruckelshaus Center to correct the May 27, 2015 summary notes and post to the Task Force website. (COMPLETE)

**PCB-Free Product Purchasing: Does the SRRTF want to urge other municipalities to adopt policies?**

Chris Page mentioned the suggestion that the Task Force encourage other municipalities to adopt PCB purchasing policies (policies have been adopted at the State level, and in the City of Spokane and Spokane County). Brian Nickel expressed that EPA would like to see this happen; this will show that the Task Force is doing something tangible, taking action where they know sources can be reduced.

The cities of Coeur d’Alene and Post Falls would like to wait on sending any letters until they have had time to confer with their constituents and get a better understanding about what their communities are willing to do with purchasing policies. Developing a PCB purchasing policy/program is a complicated and costly process; smaller municipalities may not have enough revenue to do a PCB purchasing policy/program. Further, it could potentially open the community up to liability issues and delays.

The PCB purchasing programs at the State and City/County level are still being developed. Once they have successful programs in place, they could advise how to implement such a policy in smaller communities. As policies get implemented, vendors may push back—so policies need to be iterative. A regional program that allows for sharing information could help smaller communities.

The Task Force will be putting together a comprehensive plan by 2016; this recommendation for PCB purchasing policies could be included in the Comprehensive Plan as a best management practice (BMP). The group agreed that for the time being, Task Force members should take this information back to their communities and find out what the thinking is; this is the advantage of the collaborative process/nature of the Task Force.

**ACTION ITEM:** Task Force members to open up the dialogue with their municipalities on the potential for PCB purchasing Policy.

**ACTION ITEM:** Spokane County and City of Spokane to send purchasing policies to Ruckelshaus Center. (COMPLETE)

**ACTION ITEM:** Ruckelshaus Center to post the City of Spokane and Spokane County PCB purchasing policy on the Task Force website. (COMPLETE)

**TTWG Report and Technical Topics**

Dave Dilks presented on the Task Force’s 2014 synoptic survey and Ecology’s 2011 PCB assessment, explaining that the two studies are not directly comparable. The Ecology assessment was designed to define the load contribution from different sources using an annual average, while the 2014 Task Force study assessed where the “unknown” source(s) come from during summer low flow. The Ecology assessment found that stormwater is a large source and that there is an un-accounted for source contributing to river load. The Task Force study found a significant dry weather load entering the river between Barker Road and Trent Avenue. Dave said these studies are not comparable since annual average loads cannot be directly compared to summer low flow loads.

Dave also discussed Hangman Creek, where during the 2014 dry weather study a high concentration was measured after a rainfall event. This indicated it may be a significant source of PCBs; however, several factors are a bit odd: the timing of the rainfall event, the increase in flow, and when the high value was seen. The PCB spike is not reflected in the composite sample (95 pg/l). The data is inconclusive, so the Task Force may want to do further study of Hangman Creek.

Bud Leber walked through a spreadsheet with potentially comparable data points between the Ecology report and the Task Force study. Ecology used “mean harmonic flow” to calculate milligrams (mg) per day loadings in the river. The mean harmonic flow is an estimate of the average river flow at a location. The Task Force study

used the actual flow (as measured at the time of sampling) to calculate the mg/day loadings. As a result, the flows used in the loading calculations vary widely—so the loadings between the studies cannot be compared.

The Ecology data was based on samples collected in-river at three different times of the year, October, February, and May. The February and May sampling events are high flow (runoff) time periods. October is generally much lower flow and would more closely represent a river flow similar to our August sampling period. Thus the closest comparison for river concentration is the Ecology October 2003 data with the Task Force August 2014 data.

#### **Q&A/Comments**

- Can the concentrations be compared? The studies used different sampling methods. Could look at an order of magnitude scale; however, they are still not comparable because of the different time frames, and scales.
- Hangman Creek: Don't know enough to say it is a source. Additional monitoring suggested as a future project.
- Is there a need for, or anticipation of, future sampling that will provide comparability to Ecology's work?
- Discharger values could be comparable data, as it is the most consistent data. It appears the City of Spokane had a 50% decrease. Dave Moss said the County's plant is at 99% removal.
- Lisa Dally-Wilson: Liberty Lake shows decreases, based on installing next level of treatment. How consistent are the PCB in outflows, day to day? Variable within a certain range.
- Dan Redline: are those values an average over several days/measurements. Brandee explained that the 2014 was an average, so probably pretty good data.
- Lot more variability in grab samples than composites.

#### **WA PCB – Purchasing Law**

Steve Krueger: Discussed RCW 39.26.280 SEC. 2. Steve has been working with Ecology on best practices for implementation of greener purchasing, though procurement laws have made this difficult. There have been many complaints because vendors were not happy to be required to spend resources addressing PCBs. The new program will give vendors bonus points for investing in greener products. Awards will be based on "best value." Best Value includes: satisfy the need, and make sure the goods and services are not harmful to human health or the environment. These awards will be decided based on best value bid weighted calculator.

#### **Q&A/Comments**

- Best Value Calculator (BVC): Certain products have a higher potential to impact streams and water quality. Is there a way to look at overall cost of municipal cost of treatment of those products from Waste Water Treatment Plants (WWTP) as compared to cost of buying a more expensive product? Can this be factored into the BVC? Products suspected or known to have PCBs should have a standard testing method. Total cost of ownership could drive the preference points for choosing products. Steve has developed a training program on the BVC (an Excel spreadsheet). The calculator can verify that best value has been achieved.
- Is there a provision for less PCBs? The tool allows for a sliding scale for level of PCBs contained.
- If the PCB-laden product is chosen due to a large cost difference, how does the downstream cleanup and cost get included in the BVC?
- How do you determine this "total cost of ownership"? If it is cheaper to remediate than to buy the product free of PCBs, where does the extra money go? Does it go to pay for the cleanup?

**ACTION ITEM:** Ruckelshaus Center to invite Steve Krueger to attend July Task Force meeting. (COMPLETE)

**ACTION ITEM:** Steve Krueger to do a run through of the Best Value Calculator at a future Task Force meeting.

#### **TTWG Report and Technical Topics: LimnoTech Phase 2 report**

Chris Page suggested that as there are many comments on the Report to address at this larger Task Force meeting. Chris suggested that a smaller group such as the Technical Track Work Group (TTWG) or a small work group could work in coordination with LimnoTech to address these comments. Many of the edits and comments are straight forward and easy to address. Dave Dilks agreed that approximately 90% of the edits/comments are easily addressed and 10% of the comments are outside the scope of this project and report.

Lisa Dally-Wilson explained that the Spokane River Stewardship Partnership (SRSP) spent a good amount of time looking at the report. The SRSP developed 5 big picture items for LimnoTech to address.

1. Append all reports/affiliated field studies so this is a stand-alone document (Gravity Report, AXYS Discs, Quality Assurance Project Plan (QAPP), Sampling and Analysis Plan (SAP), Confidence Interval Testing Information, other field info).
2. Loads: a schematic would be helpful. Include in-river and known and unknown out-of-river loads by reach, and relative loads. There was also a suggestion to show the unintended relative load from CSO/stormwater input, compared to loads from dischargers and the unknown load from Barker to Trent.
3. Discuss uncertainty (either qualitatively or quantitatively) from confidence interval testing and actual field activities on big picture results. Also qualify results by mentioning problems with flow measurement.
4. Compare high volume sampling with grab sampling results (summarize).
5. Spell out intent to look at flows and concentrations at seven locations, six reaches. Explain that we didn't get flows at points x, y and z. Discuss implications. What we could learn, what we weren't able to learn.

**ACTION ITEM:** Lisa Dally-Wilson to send Dave Dilks the list of 5 big picture items that the SRSP identified regarding the Technical Phase 2 report. (COMPLETE)

**ACTION ITEM:** LimnoTech to address the big picture comments and comments received. (COMPLETE)

**ACTION ITEM:** TTWG to discuss/respond and work to get the report ready for July 29<sup>th</sup> Task Force meeting.

**Prioritize Technical Work Projects (based on TTWG recommendations)**

Bud presented on Technical Work next steps, explaining that Dave Dilks presented to the TTWG in June: a high level overview of Phase 3 scoping and list of potential next-step projects. TTWG completed a pareto analysis to develop a priority for next step projects. Projects, prioritization and cost are provided in the table below.

Technical Task (by priority)	Project Description	One-Time Cost	Annual Cost
1. Incidental Sampling	Non-specific wet weather sampling to estimate loading v River sampling (Barker to Trent) to guide up gradient groundwater investigation. Indicator chemistry, temperature, flow measurements	?	
2. Dry Weather Sampling (Barker to Trent, Green Street to Trent segments)	After Greene Street gage upgrade repeat the 2014 river sampling. Barker, Trent, Greene, and Spokane stations	\$65,000	
3. Groundwater – Up gradient of Kaiser Property	Up gradient Groundwater Investigations. Barker to Trent – “Kaiser Section” only. Install and monitor wells to identify contribution. Location based or Use based	\$70,000 to \$130,000	
4. Retrospective Loading Analysis	Stormwater Contribution Assessments: Retrospective Loading Analysis. Estimate contribution through analysis of existing data (concentration and river flow).	\$7,500	
5. Groundwater – Up gradient Barker to Trent.	Barker to Trent – “Non-Kaiser Section”. Install and monitor wells to identify contributions from groundwater. Location based or Use based	\$55,000 to \$130,000	
6. Hangman creek (wet)	Wet weather sampling	\$27,000	
7. Trent Gage	Operate Trent Gage		\$20,000
8. Nine Mile Gage	Install and Operate Nine Mile Gage	\$25,000	\$20,000
9. City of Spokane (wet)	Wet weather sampling	\$14,000	

**Other Task Force Costs:**

Other Cost Estimates	One-Time Cost	Monthly Cost	Annual Cost
<b>LimnoTech Costs</b>			
Develop Monitoring Scopes	\$5,000		
Meeting Participation		\$1,200	
Workshop Participation	\$5,000		
Update Dry Weather Mass Balances	\$7,500		
Assess Wet Weather Loads	\$5,000		
Assess Groundwater Loads	\$7,500		
Reporting	\$5,000		
Project Management		\$400	
<b>Other Tasks</b>			
Ruckelshaus			\$72,500
High Volume Sampling "Proofing"	\$65,000		
Workshop	\$10,000		
Administrative Expenses			\$5,000

The group discussed the following topics: manual flow measurements where needed, data compatibility with Ecology’s Environmental Information Management (EIM) system, AXYS and Gravity availability for dry weather sampling, Environmental Assessment Program (EAP) technical assistance, groundwater sampling concurrent with dry weather sampling, in-river sampling up-gradient of Kaiser.

**DECISION:** The Task Force unanimously agreed to proceed with the dry weather mass balance sampling project.  
**ACTION ITEM:** TTWG to refine a plan on studying the groundwater contribution and Incidental sampling (shorter term goals, optimal costs, timeframe, scope). (COMPLETE, TTWG will meet again on July 13, 2015)

**Court Case Update**

Brian Nickel said EPA is working on its response to the judge, coordinating with Ecology. They will structure the response so the Task Force will remain active to continue with its important work. They will include quantifiable benchmarks and permitting recommendations, as well as a date at which Ecology will pursue a Total Maximum Daily Load (TMDL). As long as the Task Force is demonstrating progress, a TMDL can be delayed on that basis. Progress will be ultimately based on PCB concentrations in the river going down. EPA will finalize its submittal on July 15<sup>th</sup>. Brian will attend the July 29, 2015 Task Force meeting to answer many of the Task Force’s questions regarding the response and the Task Force moving forward.

- EPA has received the Task Force response. What are EPA’s intentions on utilization of that response? Brian is not sure yet how it will be utilized.
- If the Task Force can continue as long PCB concentrations in the river are dropping, how long can this “glide” path last? The City of Spokane next-level treatment arrives 2021; this will reduce in-river concentrations. Brian explained that EPA is looking into this for consideration of what point a TMDL would happen.
- The impairment for the river is based on fish tissue, how does fish tissue relate to the water column? Brian explained that because of the complex nature of this relationship and time lag in response, they are not making fish tissue a factor in the schedule.

**SWAT Team Updates:**

- **Vector Waste:** The lab results are back. Vector solids are within the range of what was seen before. A bit higher at Washington Department of Transportation. They are currently putting together a report. The report will be available by August 23<sup>rd</sup>, 2015 for review.
- **Hydroseed:** All four product samples have been analyzed. Once the data sets are available the group will put together a report based on the results. The report will be available in August-September.
- **Data Management:** The group will be working with folks in the Duwamish in near future.
- **Flow Gages:** Nothing to report today

### **BMPs and PCB-Reduction Actions**

Adriane Borgias explained that it is time to start framing Best Management Practices (BMPs) such as street sweeping, purchasing standards, demolition standards, and other practices that can be included in the comprehensive plan. Look at PCB Chemical Action Plan (CAP) as well as: Energy Utilities (Inland power, Avista) transformer removal, infrastructure modifications (decant facility), local source control program, urban waters initiative (small businesses regarding BMPs and hazardous waste disposal), Idaho dischargers education requirement (BMP for disposal of micro contaminated PCBs), car shredding (also in CAP).

**ACTION ITEM:** A work group will start listing and framing these BMPs for a comprehensive plan. The group will include the following members: Mike Petersen, Adriane Borgias, Sandy Phillips, Kevin Booth, and Jerry White.

### **Events and Outreach:**

- Lynn Schmidt and Adriane Borgias will present in Oregon at the “Oregon Clean Water Association” – Bend, Oregon July 24<sup>th</sup>.
- Adriane will present at the International Association for Public Participation meeting in Portland in September.
- Public Opinion Survey by Spokane River Forum: Marlene Feist will present to the Task Force, Task Force can request some data mining if needed.
- State Funding Update: At the time of this meeting the house budget had allotted \$500,000 while the Senate had allotted \$150,000. Task Force Members are encouraged to contact their senators regarding this budget.
- ACE has about \$300,000 in budget currently.

### **Updates and Announcements:**

The Memorandum of Agreement (MOA) work group reconvened. The group has been functioning on a caucus model. This model will not work for this next round of the MOA work group. Representatives from both Post Falls and Inland Empire Paper must be involved given the extent of comments received from legal review. Chris Page proposed moving the MOA work group meeting till after the next Task Force Meeting.

**ACTION ITEM:** Kara Whitman to cancel the 2 scheduled MOA Work group (June 30<sup>th</sup>, and July 8<sup>th</sup>). To be rescheduled after the July Task Force meeting. (COMPLETE)

**ACTION ITEM:** Venue for the July 1<sup>st</sup> TTWG meeting to be changed to the Washington Department of Transportation. Ruckelshaus to send out revised meeting notice. (COMPLETE)

Will Hobbs of EAP has been working on an Atmospheric Deposition “desk study” (literature review) to assess the state of the science as far as atmospheric deposition of toxics. There is not very much data; the most comprehensive data sets on this come from the Puget Sound. The literature emphasizes the need for site specific data sets. Very few studies have assessed atmospheric deposition of toxics to water bodies, with the exception of State or international level (much larger water bodies). Indirect movement of atmospherically

deposited toxics to the river is more important in a river system such as the Spokane. An EAP project led by Brandee Era-Miller will address this to some degree. The project involves collecting wet and dry deposition in the Spokane River region, this will only provide a few data points. Will need fate and transport modeling to understand how it gets to the river. The Task Force suggested that Will and Brandee contact Brian Lamb at WSU.

**ACTION ITEM:** Will Hobbs to work on getting permission to provide internal report on atmospheric deposition literature review.

**Announcements and Updates:**

- Brian Nickel has forwarded the Task Force’s Coordinated Response to EPA (for the submittal to the judge) to the Spokane Tribe (Brian Crossley, and Ted Knight).
- Dan Redline noted that the region is set for historic low levels of water and flow. Potential as low as 500 cfs at Post Falls.

**ACTION ITEM:** Lynn Schmidt to put a map together that includes river gaining and losing reaches, gage locations, locations of all point source dischargers and other important contextual information. (COMPLETE)

**No Public Comment**

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The next SRRTTF meeting is July 29, 2015 at the Spokane County Water Resource Center.  
The next Technical Track Work Group meeting is July 1, 2015 at the Washington Department of Transportation.