

Combined Spokane River Regional Toxics Task Force/Technical Track Work Group Meeting

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

WA Department of Ecology | 4601 N. Monroe | Spokane WA

Wednesday June 15, 2016

Attendees: * indicates a voting member

BiJay Adams –Liberty Lake Sewer and Water District

Tom Agnew* (phone) –Liberty Lake Sewer and

John Beacham (phone) –City of Post Falls

Kevin Booth –Avista

Adriane Borgias –Department of Ecology

Galen Buterbaugh* (phone)

Lisa Dally-Wilson –Dally Environmental

Dave Dilks (phone) –LimnoTech

Jeff Donovan –City of Spokane

Mike Coster –City of Spokane

Ted Hamlin –Department of Ecology

Mike Hermanson–Spokane County

Kris Holm (phone) –City of Coeur d'Alene

Paul Klatt (phone) –J-U-B Engineering

Doug Krapas* –Inland Empire Paper

Mike LaScuola* –Spokane Regional Health District

Bud Leber –Kaiser Aluminum

Lisa Manning* (phone) –Kootenai

Environmental Alliance

Dave McBride* (phone) –Department of Health

Dave Moss* –Spokane County

Mike Petersen* –Lands Council

Sandy Phillips –Spokane Regional Health District

Jeremy Ryf – WA Department of Ecology

Water District

Elizabeth Schoedel* –City of Spokane

Jerry White –Riverkeeper

Introductions and Agenda Review

After a round of introductions, Chris Page went over the agenda. No changes were made to the agenda. Quorum reached with 8 voting members in attendance.

TSCA Reform Comment Letter

Doug explained that he feels that sending the letter is not needed at this time. Doug and his group will be working with the governor's office to work on other options for raising awareness as congress is not planning on addressing this concern at this time. There may be an opportunity to send the letter in the future. Mike Petersen will bring this up when meeting with legislature about this issue. Perhaps EPA can still address this in the future. The TSCA SWAT team will work on a strategy for moving forward, the letter, if used, will be revised, and re-voted on.

Note: Do not list EPA on the letterhead if this letter or another version of it is used in the future. (State or Federal)

DECISION: The Task Force voting members agreed that the Task Force will not send the letter at this time, due to the fact that the bill has already passed. The letter will be saved for a later date to be revised for State regulatory level conversation.

Dave Dilks Presentation: Comprehensive Plan memos and Monthly Monitoring

See full presentation at <http://srrttf.org/?p=6463>. All memos, revisions, and comments received are posted at http://srrttf.org/?page_id=6228.

Magnitude of Sources and Pathways Memo

Dave went over the changes made to the memo including presentation format changes (tables and graphics).

Q&A/Comments

- **C.** Suggestions: WWTP graph, use an interrupted scale, truncate scale 10,000 or so and show that part of the whisker is off the scale for one data point. Allow for a larger scale for the rest of the dischargers.
- **Q.** One sample for routine monitoring for Coeur d'Alene (CDA)? **A.** That is all they got from CDA, Dave Dilks and Kris Holm will circle back and check on this.
- **C.** Mass of PCBs, Clarify the Y axis; Add explanation in a legend for box and whisker plots. **A.** not in legend but in the body of the text. **Q.** did you use all outliers? **A.** Did not screen anything out.
- **Q.** other changes, source estimations changes? Converted to a range. **C.** is still unclear to some folks in the room. Comment /edit made 1 revision ago in response to a comment. Need some minor clarifications about how single numbers changed to ranges.
- **C.** Figure 2-Map-ranges of the loading as min and max, it doesn't seem to be particularly useful when there is a range of 4 to 2600. Is the range useful without the median? Put median or range in parentheses? **Could add notation to the map to see Table... to see further analysis of this data.**

ACTION ITEM: Mike Hermanson to summarize the edits proposed and then send them to Dave Dilks. (COMPLETE)

DECISION: The Task Force provisionally approved the "Magnitude of Source Areas and Pathways" memo with the noted edits to graphics and minor clarifications.

Task 2a: "Inventory of Control Actions" Memo

Dave recommends deferring a decision on this memo given new substantive comments that have been received and move the approval to the July Task Force meeting.

Task 2b: "PCB Control Actions Cost/Effectiveness" memo

Dave Dilks explained that he has received many comments on the memo including: more detail in "costs" table, more detail on relative magnitude of intermediate pathways, and the ability of control actions to affect delivery, and memo organization and format. Dave explained that Task Force members have stated that the memo is not arranged in a coherent manner at this time. Dave suggests that he does a significant re-organization of the memo.

Fact Sheet Format: Dave Dilks discussed the proposed format for presenting control actions in the Comprehensive Plan and for use at the June 27, 2016 Task Force meeting. LimnoTech will create a "fact sheet" for each Control action. The fact sheets will include: how the action would be implemented, the reduction efficiency, the significance of the pathway (qualitative and some quantitative), cost, qualitative description of the key advantages and disadvantages of the control action.

Summary Format: Dave Dilks explained the proposed method of summarizing the different control actions in a table. There will be a list control actions that will be scored based on different aspects such as removal efficiency, magnitude of pathway, cost, implementing entity, hierarchy, ancillary benefit, and redundancy. This format will be a template for moving forward. Cost is the least predictable. The group recommended adding another color (or other) for "unknown" to differentiate from a number values (low, medium, high, unknown). Make sure scales are all meaningful, this will be important for getting group consensus on scores for control actions.

Schedule

Final Draft by July 1, Proposed interim schedule: revised draft by June 22nd, official draft for review by July 6. (prior to workshop, consensus on what is contained in the fact sheets)

Q&A/Comments:

- **Q.** Will it be clear what the control actions are targeting (sources and pathways)? Connection between the memos? The more internal coordination between the memos and efforts, the better. Down the road there will need to be discussion of interim targets.
- **C.** Use precaution as the Comprehensive Plan moves forward given the uncertainty and use of qualitative information (rather than robust quantitative information), it is difficult to know the cost effectiveness of BMPs. **A.** Future studies component of the plan will address this issue.
- **C.** This would be a “menu” of options; entities moving forward with control actions would do extensive research before implementing a control action. Cannot direct action that does not fit the entities capabilities.
- **C.** the Comprehensive Plan would cover control actions outside the purview of other BMPs implemented by individual entities.
- **C.** Start identifying who the appropriate entities are for different control actions. Identify control actions that are already in permits. Explicitly say, these actions are already addressed in the permit.
- **C.** Brian Nickel explained that EPA did mention that permit writers should look to the Task Force Comprehensive Plan. Permit will be subject to public comment and limitations of the NPDES program. It is good to be mindful of the potential connection, but it is not a direct connection, the Comprehensive Plan does not dictate the content of the permit.
- **C.** the Task Force has not weighed in on how to address the EPA suggestions in the MOA.

ACTION ITEM: Ruckelshaus Center to add an update on the court case to the June 22, 2016 Task Force meeting Agenda. (COMPLETE)

Monthly Sampling:

Dave Dilks gave an update on the monthly sampling. Dave explained that the City is rehabilitating the Upriver Dam Spillway. Sampling is starting June 22. The work at the dam is set to start July 6th. Elizabeth Schoedel added that the work schedule has been extended for six months on the dam; the Task Force will have to consider the ramifications to fall monitoring. The first round of PCB results has been received and the data is being blank-corrected and should be available by the June 22nd Task Force meeting. Post raw data? QA review? The data will be made available for posting to TF website after the initial QA by LimnoTech.

July 27, 2016 Task Force Meeting /Workshop

Chris Page explained that the Ruckelshaus Center is working with Limnotech on the format of the workshop. There will be more information on this at the June 22 Task Force meeting.

- Fact Sheets
- Selection Criteria
- Tools: small group discussions (options: pathways, criteria, stakeholder groups)
 - Consensus, challenging if split into small groups. Can work this out in a few different ways so that everyone can contribute to discussion on each control action.
 - Lunch-bring food in?
- Focus consensus seeking on how the Task Force can implement something, rather than making it a fact finding workshop, will rely on the control action fact sheets from Dave Dilks.
- What is the Task Force working on consensus for? Define this.

- Task 2a and 2b memos as agreed upon “fact” so that the TF can focus on moving forward.
- C. Water quality standards and fish tissue concentrations –river is within the water quality criteria, need to make link to fish tissue.
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ACTION ITEM: Ruckelshaus Center to work on a preliminary draft agenda for the June 27, 2016 Task Force Meeting/Workshop.

Future Studies in the Comprehensive Plan

Dave Dilks explained that he views the “future studies” portion of the comprehensive plan as an outcome of the workshop. This may include control actions that the Task Force does not know enough about, and that need more data to further vet them.

Q&A/Comments:

- C. Further studies are an important outcome of the comprehensive plan, but so are identifying and implement actions.
- C. Fish tissue vs. water column –who should be doing this work? Based on information that is incomplete. (bioconcentration vs. bioaccumulation)
- C. Going down a path of control actions, but need to identify that there is a problem –(don’t want to waste resources on source control actions that focus on something that is not actually a problem)
- C. Explore sediment archives and how they related to accumulation/biomagnifications in fish, need to better understand the system going forward.(Fingerprinting etc.)
- C. Rule making adoption occurring right now. The task force is tasked with working toward compliance with the current water quality standard.
- C. Idaho is using bioaccumulation and WA is using Bioconcentration. This system is going to be relatively easier to study (more of a closed system) than other systems such as estuary systems. Workshop – how we might get more detail on this, and cost?
- C. Potential upgradient source of Kaiser with link to groundwater sources to the river that may or may not be there (based on synoptic sampling of the river).
 - The Comprehensive Plan is a good vehicle for communicating the big picture to the rest of the world. Good description of other activities going on.
- C. input from groundwater seepage from cleanup sites dictated by MTCA - how do criteria relate to each other (CWA and MTCA etc). The Task Force cannot supersede the MTCA agreements.
 - Kaiser: The Task force should not waste its time around BMPs of site cleanup that are already under the Model Toxics Control Act (MTCA). MTCA has clearly established criteria that protect the water quality, and is regulated by Ecology.

ACTION ITEM: Peer review on the Kaiser data on an upcoming agenda.

 The next SRRTTF Meeting is June 22, 2016 from 9am -12:30 pm at the Liberty Lake Sewer and Water District
 The next meeting of the Technical Track Work Group is July 6, 2016 from 10am-12pm at the Department of Ecology

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