



*For a Fishable and Swimmable Spokane River*

August 26, 2013

Administrator Dennis McLaren  
U.S. EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101

**RE: Draft NPDES Permits for Idaho Dischargers on the Spokane River**

Dear Administrator McLaren,

I am writing this letter independent of the current comment period for the Draft NPDES Permits for Idaho Dischargers, though I plan to submit more detailed comments through that aforementioned process that also alludes to the subject matter of this letter. This letter, submitted on behalf of Spokane Riverkeeper (“Riverkeeper”), is to bring to your attention a potential problem we see with EPA’s involvement, or lack thereof, in the Spokane River Regional Toxics Task Force (“SRRTTF”).

As a founding member of the SRRTTF, we are committed to the collaborative effort to find and reduce toxic compounds in the Spokane River, especially PCBs, or polychlorinated biphenyls, for which segments of the Spokane River are listed for as impaired on the § 303(d) list.

This collaborative effort is currently operating under a Memorandum of Understanding signed by the NPDES permit holders in the state of Washington, the Spokane Tribe, the Washington State Department of Ecology, and several environmental groups. The draft NPDES permits for the State of Idaho include, among other things, a requirement for participation in the SRRTTF. Which means we need EPA at the table too.

Riverkeeper is willing to continue to participate in the process in good faith, but EPA must commit to participating, must be active and engaged in discussion and the solutions, and most importantly must sign the MOU and send a representative to attend the meetings.

While EPA has participated periodically in the process over the last year, the inconsistent representation has added little confidence that EPA is committed to the process and its success. As the permit writing authority for the State of Idaho, we can’t envision a successful outcome without EPA at the table – we need your oversight of the Idaho permittees and guidance in dealing with this transboundary water quality problem.



In short, this process needs a clear commitment by EPA to participate in the process – we need EPA to sign the MOU and commit one consistent representative to participate in the process.

Sincerely,

A handwritten signature in black ink, reading "Bart Mihailovich". The signature is written in a cursive style with a large initial "B".

Bart Mihailovich  
Spokane Riverkeeper

cc: Maia Bellon, Director, Department of Ecology  
SRRTF Members