

# ALL STATEMENTS

## 1. Measurable progress discussion

### A. How does this topic impact you or your organization?

- It is important to stay connected with sovereign governments on this topic.
- Ecology has the responsibility but needs to develop the concept with everyone's input.
- Perspective: the concept of "measurable progress" was included in the NPDES permits and MOA at the request of the Spokane Tribe and others who were involved in the early SRRTTF process.
- The SRRTTF is not *in lieu* of a TMDL; Ecology will do a TMDL if we don't make "measurable progress." So, we want to honestly answer the question, "Did we make Measurable Progress?"
  
- Idaho is still in the draft stages of the permit and not sure what "measurable progress" will mean yet. Expects to hear directly from the permittees on this topic.
- There is similar language in the Lake Management Plan with respect to management of metals.
- Would like to hear what EPA's interpretation on this topic is.
  
- The Lake Management Plan uses a 5-year trends analysis. This should be a minimum goal for tracking trends. This is a collaborative state/tribe effort.
- What has the Task Force done to date that is measurable?
- Be cautious about using the efforts of others as a measure of SRRTTF work.
  
- Progress should be measured along the entire length of the river: PCB levels in the Spokane River as a tributary to Lake Roosevelt.
- How would fish consumption data be used as a trend?
- Measurable Progress (MP) gives us an idea of what is being done to meet Water Quality Standards (WQS). This topic defines the goal for MP.
- MP is key to an alternative way for reducing PCBs and showing that we are doing something.
- RiverKeeper has a mission/supporters/members that support using the Clean Water Act to clean up and protect the Spokane River. MP is the answer that is needed to show that RK is fulfilling its mission.
- Reducing PCBs in fish could be a long term program. MP is important to the public so that they can see that something is happening. Change is expected to be slow over time.
- Measurable progress (MP) is in the permit conditions.
- If MP is not made, then the Ecology ~~will default to the traditional!~~ 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"
- The current way of doing things is a better use of resources/fewer lawsuits
  - Previous experience of the traditional TMDL process was not productive
- PCB is a public health risk. This relates to decreasing the risk, with the potential to decrease the incidence of chronic disease, health effects, and impact the fish consumption advisories.

### B. What do you think embodies measurable progress toward meeting water quality standards for those?

- Information relating to Fish Consumption, along entire length of the river

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- Fish Advisories, with the goal being “none”
- 5-year trends
  
- Tracking cleanup sites: on-going work and sediment clean up. For example, where is the final report on the work that Ecology is doing (Sandy Treccani) regarding beach clean up?
  
- NPDES permittees: upgrades to systems and removal of PCB from wastewater; i.e., Municipal WWTPs membrane filtration, Kaiser Aluminum walnut treatment system
  
- Urban Waters: Source control identification, prevention, and response actions.
  
- 1) Discovering sources of PCB; 2) Removing sources of PCB
  
- ~~Everything we are doing~~ All coordination and collaboration between is a step towards progress.
- Need to document what we are doing, tell the story.
  - Develop a database, timeline, documentation on the website
- Example MP: The Technical Workshop. This should be viewed as MP even though there was no tangible change to water quality. This is qualitative and educational and received ~~something that the dischargers believed would be measured as progress because of~~ positive feedback/support from Ecology ~~that~~ it was of value.
- Whatever the definition of MP, it would be better to know sooner than later.
- Other examples of MP:
  - What we have learned
  - Efforts at TSCA rulemaking reform
  - An impact to point source discharges: stormwater actions, treatment technologies. These can be measured as amount of PCB removed
  - County’s new plant has the next level of treatment for Phosphorus (P), which also removes PCB
  - IEP has the algae based technology
  - City of Spokane stormwater program and LID activities; catch basin clean-outs; street sweeping; monitoring
- What we do can be attributed to the entire community
- Data equals measurable progress
- Strategies such as an Integrated Management Strategy can be used to determine measurable progress
- Another measure would be an engineering modification, installation of state-of-the-art equipment
- Is there a process in place?
  - Like the Task Force identifying data gaps
  - Public and business outreach activities
  - Studies
- Outcomes

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- Decrease of PCB in fish tissue
- Decrease PCB in stormwater and NPDES

### C. *How do you think the Department of Ecology would define measurable progress?*

- 303(d) listings: the Spokane River meets water quality standards. The way segments are listed is being changed in Washington State from a Section/Township/Range designation to a reach designation. This will affect how the listings are described on the river: there will most likely be larger but a fewer number of segments.
- Timescale: The time frame for achieving water quality standards is long term (> 50 years?) vs. a shorter timeframe needed for the permit cycle (2016). On a smaller scale, what would be measurable?
- Could do a matrix of goals and outcomes, with a set of goals that addresses the permit cycle.
- The Idaho permittees will be doing in-river monitoring, which could change the 303(d) listings on the river.
- The TMDL would ratchet down the limits. MP means ratcheting down the numbers (i.e. the PCB numbers go down).
- “Should” is different than “would.”
- There would be a certain amount of process. Did we do the process right (issue permits, check for compliance, etc.).
- This is something the dischargers want to know.
- There is tangible and intangible, quantitative and qualitative progress - qualitative and quantitative progress should both be considered
- The term was added to the Washington permits so there was some thinking as to the meaning or deliberate choice to allow collaboration and cooperation between all dischargers and stakeholders.
- Example MP: Clean up at Upriver dam was a significant reduction.
- Example MP – lobbying and securing legislative financial support of \$350,000 for the Spokane River
- Ecology would define what we have done to date as MP since what we have done to date was with the approval of Ecology.
- Example MP: ~~Ecology adding an FTE~~ Adding Ecology staff to participate as their representative on the SRRTTF , where before there was no designated/dedicated staff ~~the Spokane River~~
- Compliance ~~with~~ based on data and administrative code **compliance**
- We have health based standards that use the “best available science,” risk assessment, and risk management. We can’t reach “zero” risk but the risk we accept is a personal preference. All we can say is, “this is the best **available health and risk assessment science** that we know today.”
- There is a tug of war between **feasibilities (economic and technological)** and preference with respect to meetings standards.
- Fish data may not represent all risks since other health risks could come from other sources **(synergistic effects).**

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- One measure of progress would be the ability of the Tribe to increase **their** healthy fish consumption rates because the concentration of PCB in the environment has gone down.

### **D. Do you think others on the SRRTTF would define it the same way as either you or Ecology? If not, how would other parties define it?**

- Time is an important consideration: How long does the process have to get to the endpoint?
- Ideally, would have metrics that would be applicable at the end of the permit cycle. Is 5 years important? 10 years? Need next three years to evaluate and answer the question of measurable progress.
  
- Look at currently available quantitative results to see what can be used to determine measurable progress.
  
- As we collect data, measurable progress becomes a refinement of the *loading*. The better the river system is described, the better we define the question we are trying to answer, the easier it is to define “measurable progress.”
  
- Identifying and responding to data gaps is worthwhile. For example, the PCB TMDL had identified that the data was unable to account for more than half the PCB inputs to the river due to uncertainty of the measurement or lack of knowledge about specific inputs. Better estimates of the PCB inputs to the river are needed to do evaluate progress.
  
- Examples current areas where measurements are being taken or have been identified:
  - Washington DOT is measuring PCB removed from stormwater sediment as a result of vector truck operations.
  - City of Spokane Integrated Planning
  - NPDES permit requirements and Toxics Management Plans
  - Urban Waters plans to do In-River sampling of sediment
- Assign a value with respect to different activities such as products/product removal from market, public education and outreach. Perhaps a matrix approach: inputs/outputs/outcomes.
  - Caution about assessing the effectiveness of education and outreach. This is not necessarily a straightforward process.
- The “process “is how others would define MP.
- The SRHD would say fish consumption is important. This is also important to the Lands Council.
- Idaho would just want to do what is necessary to stay out of trouble.
- The Spokane Tribe would want to know if we are meeting their WQS.
- Dischargers would define it so they don’t get put out of business.
- Spokane Tribe and other environmental groups expect MP to be reduction of PCBs in the river: this is a portion of the definition but is narrower than what the definition should be. [Goal is to meet tribe’s WQS](#)
- We are focused on achieving WQS and there is some level of concurrency by the Tribe on this.

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- Example MPs:
  - Have identified some data gaps and need further analysis of existing and future data ~~Gap analysis of currently available data is needed~~
  - ECOS and TSCA rulemaking is effort is huge (for Spokane and nationally)
- If the Task Force ended tomorrow, we would reverse course and delay the ~~effort~~ goal to meet the tribal WQS for at least a decade (been there, done that, don't want to do it again).
- Each day of discussion equals progress.
- Need to be careful how define MP - MP is nebulously defined in the permit for a reason and which eshould involve a reflective analysis maneuvering at the end. This ~~should cannot~~ be pinned down ahead of time ~~– to do so could become to avoid becoming~~ problematic later. ~~But at the same time, the definition should allow for look back~~ If a definition is forced early, it could have legal implications.
- ~~What do the words~~ MP ~~mean~~ needs to be defined in the context of the permit/MOA?
- Where does the definition of MP lead with respect to the impact on permit modifications and litigation?
- The regulators have a dilemma in determining what is needed for defining MP at this time.
- ~~When does~~ MP ~~needs~~ to be defined? ~~( at the end of the permit cycle - 2017-2018?)~~
- There will be an evaluation of MP at some point down the road and this will be important.
- What is “measurable” is subjective: treatment, removal vs. the nebulous qualities achieved through education and awareness.
- Reflecting back is important because information and knowledge changes over time.
- ~~Are we~~ continue to add stakeholders and educate about the ~~bringing enough people along in the thought process as to what the~~ Task Force ~~is about?~~
- Measurements can change over time and the ability to make dramatic reductions can change too.
- How do you determine MP?
  - The tool is reflective of actions taken
  - Timeframe needs to be considered (i.e., if fish is an indicator, how long does it take to determine?) For example, if decrease PCBs in fish tissue, this may not be measurable for 15 years - it is not fair to judge whether there is a reduction at the 5 years. Need to provide enough time to measure the impact
- The permits say “measurable progress by the Task Force,” but the work is done by the permit holders. This has to be balanced in. The Task Force is not doing the clean up activities but the individual organizations are. This needs to be measured.
- No discharger is shirking their responsibilities. – Somehow need to shift to the entire watershed – MP need s to be accepted by the community as a whole and not just focused on the dischargers.
- This brings us back to the original concept that was discussed: Is the Task Force doing its job? That is what needs to be measured.

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- The discharger regulatory community is concerned with regulatory compliance and there is differing opinions as to whether or not this is the same as a health based standard.
- Health based standards could have a synergistic effect with other toxics. Others may consider this.

### ***E. What is the best-case scenario for HOW measurable progress is determined? What is best case for what measurable progress is defined as?***

- Has to be *measurable* (that is can be quantified), *defensible* (able to measure the mass (grams) of PCB removed from the river)
- Consider the different types of sources: point vs. nonpoint and criteria based on types of activity and ability to measure/predict removal of PCB/reduction of inputs from/to the river
- A best-case scenario is to have consensus about what “measurable progress” is and how it is determined.
  
- Re: upstream waters – identify the point sources; address through pre/post measurements. Monitor the movement of toxics through the system.
  
- The permits establish numeric and performance based limits. The challenge is getting to water quality based limits.
- How do we keep the Task Force engaged, being productive and effective as we move forward?
- The Task Force will need to consider reductions in other sources than just the NPDES permittees. The PCB source assessment identified NPDES discharges as 8% of the contribution. This will go down as enhanced treatment is installed. For example, the county plant removes 99.8% of PCB from influent.
- Nonpoint sources need to be included in the reductions in order to reach the 3.37 ppq water quality standard.
- If we remove all permit discharges from the river then we have to consider other effects like impacts to instream flow.
  
- Will the water quality standard change? We will most likely have tighter standards in Washington but we don't know what that will be. We don't know when that will be. We can still work towards achieving reductions in the interim.
- The Water Quality Standard will be key to the permits and the time frame needed to achieve the goal. How many permit cycles do we need to achieve the goal?
  
- Based on the experience in Oregon, might not see PCB reductions for a very long time, so focus on where reductions can be made now, which may or may not be under a permit mechanism.
- Look back is important: how far have we come over the last 20 years? Don't ignore the bigger context. What is the “slope” of the reductions for the next 20 years? That is the question. Paint the picture.
- Hopefully the permit writer (who could be different than current permit managers/staff) would define MP with as much teeth as possible so we see reductions of PCB in Spokane River.
- MP would be defined in a manner that the public can understand
- This would probably relate to fish values.

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- We rely on a tool, possibly a model, for Point Source and Non Point Source (NPS) discharges. For every Point Source, ratchet down and show trends towards PCB reductions.
- Although this would only apply to permittees, so MP also needs to show that NPS needs to be addressed. This is a similar theme with respect to the Dissolved Oxygen TMDL discussion.
- This could be an issue with dischargers, as in “we can only do so much.” The need is to be able to show progress while working with others.
  - What is best case? Every year we can look back at the work that has been done and it is effective. Some progress is easier to measure than others. We develop an ongoing story of getting better.
- Come permit renewal time, the regulatory and discharge community
  - Are comfortable with the collaboration, cooperation, and effort that has been achieved
  - In agreement with the tangible and intangible measures
  - Work continues
  - Progress is being made towards achieving the water quality standards
  - ~~Agree to move forward, even if something was attempted but didn't work~~ Recognize that some proven scientific techniques may not make a direct or immediate impact, but the value is in figuring this out – not everything conceived will work all of the time.
  - Stay out of court
  - Are on the right track and doing the right thing.
- Dischargers are putting in a lot of money into technologies for Phosphorous that benefit PCBs. But once this happens, potentially less than 1% of the contribution of PCBs to the watershed would be from dischargers. There are other sources that are contributing PCBs to the watershed.
  - The perspective shifts that this is a watershed/community wide effort.
- Participation results in watershed-wide improvements
- Acceptance of the Task Force work by the community as a whole.
- Native fish which spend their entire lives in the River may have~~are at~~ healthy concentrations and be safe to eat. The point was that the fish are being brought in from elsewhere, and those fish have different PCBs exposures – such as from imported feed. The measurement needs to be from fish that spend their entire lives in the River.
- Example MP: If we figure out where the unknowns are, even though we might not know everything. Building knowledge is MP as we need to do this in order to understand the problem.
- It is important to have a robust and open interactive forum to get everyone's perspectives and create solutions.
- It is important to work with the Tribes and make sure there is communication ~~as to what the thinking is about~~ MP on all levels.
- Relinquish the fish advisory because fish are ~~clean~~ safe to consume. Having clean fish is a driving force and a good environmental indicator.
- Consensus with all stakeholders is important

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- A measurable reduction in a NPDES outfall or stormwater would be a decrease in pollutant loading. Flow rates should relate to mass loading.

### F. *What would you describe as the major issues associated with this topic?*

- Educate on the “last 10%.” A 10% investment removes 90% and a 90% investment is required to remove the last 10%. It takes time and resources to achieve the water quality standard.
- EPA’s expertise in explaining to the public the cost/benefit of toxics reductions is valuable.
- Innovative thinking and collaboration is important.
- Question about fish consumption and impact of the dams on PCB. What is the situation in the Spokane River? What is the impact of the dams?
- It could be difficult using fish tissue information to identify the nonpoint source contribution of PCB to the river.
- Source identification
- Inadvertently import of PCBs into the watershed
- TSCA quagmire
- Funding
- Even if all dischargers remove from the water, it won’t meet WQS
- WQS as end-of-pipe limits is difficult to enforce
- This is a nontraditional process and there is ambiguity
- We could show we are making progress, but what happens if it looks like a long (i.e. 1000 year) timeframe or if it is not possible to reach the standard?
- There is a technological issue of being able to analyze samples at the threshold of analysis.
- Process: not everyone is at the table.
- As Idaho dischargers come into the process, Ecology has the Washington permits; EPA has the Idaho permits but is not as involved in the process
- Getting ~~everyone~~ all parties to agree about what MP is.
- Getting to consensus
- There has been great inconsistency within Ecology and which employees participate in WQ issues. There is a~~We have worked with many different Ecology employees and don’t know who we will work with during future permit cycles.~~ Lack of clarity within Ecology as to how DOE will staff WQ issues in the future and how permit renewals will be managed~~and definition could be an impediment in permit renewal.~~ Different ~~tee~~ Ecology employees could have a different approach.
- Permits are numeric and definable. But the MP portion of the permit was not written to be technical.
  - MP should not be numerically limiting
  - Should be broad based with an ability to reflect back to what has happened in the past
- MP refers to the progress of the Toxics Task Force and not individual dischargers. This is an important point. What the Task Force does is mostly qualitative.



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- Task Force could do an Annual Report which describes the progress that is being made. Ecology could use this as evidence of progress.
- The value of the Task Force is to be able to address the issue on a holistic basis, which is more comprehensive and effective than if the traditional TMDL process is used.
- There is an expectation that a good faith effort is worthy of acknowledgement and encouragement
  - We have made a good faith ~~attempt~~ progress to get at a good outcomes
  - Mutual understanding and trust is important to maintain
- Defining MP ~~ambiguity~~ is a wedge that could keep us from getting at trust.
- There is a conflict ~~and disparity~~ between TSCA and the CWA that affects the pollution discharge permit.
- Can't meet the PCB concentrations in wastewater because of new sources and NPS inputs.
- TSCA reform is a ~~tall, slick mountain~~ potential "slippery slope". It is possible but improbable that the CWA would be amended before TSCA if political and economic interests influence the reform process.
- The focus of activities is strong on identification. The pie chart has the unknown sources. Until the data gaps are known, the potential for reductions is limited. Can only reduce what you know.

### G. *What do you think a fair outcome would look like?*

- Something we all agree on, everyone has a chance to provide input.
- Collaboration is important
- Can the identified goal be quantified over a period of time?
- The Spokane River is unique in its level of collaboration.
- The federal dams in the Columbia River are undergoing litigation and could be seen as a source for fish advisories in the Columbia.
- Avista is removing all transformers that contain PCB oil. Find out more and what this adds up to.
- What is fair for the public is reduction in PCB
- The identification of non point sources and reduction
- Safe fish to eat, safe river to swim in.
- Fish, plants, ecosystem are healthy.
- People who produce the PCB are responsible for helping to clean it up.
- The dischargers have some amount of predictability as to what is expected.
  - The nonpoint sources create unpredictability
- Acknowledgement of the ~~Greater~~ community-wide ~~consensus that~~ good faith efforts ~~worthy of time~~ and attention by the dischargers to develop a consensus and get us as far as we can get and render permittees have made ~~in compliance with the~~ MP towards meeting WQS determination.

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- ~~Look at this as an experiment and~~ let it play out in a time which allows for a long term evaluation. If there are plans and efforts that are ongoing, then this should be accounted for during the permit renewal. Some efforts may last longer than one permit-cycle. This should be considered, particularly if there is momentum on a particular situation.
    - This concept can be backed up by a strategic plan/work plan, which is approved by all participants
  - Different measures have different ~~weights~~ **weights** so ~~feasible~~ **feasibility may influence** to get permits
  - The fish advisory is lifted (a great outcome) and mechanisms are in place to ensure that progress would continue.
  - It is desirable to have a “preventative medicine” component (**example education awareness, engineering controls, “green” product substitution**) so that funding is continuously provided towards achieving the goal.
  - Regardless of the outcome of the state’s fish consumption process, will still need to meet Tribal Water Quality Standards. A fair outcome would be a grant or funding to allow the region to pursue source identification/source control over the long run. Past history with health programs has shown that without funding, backsliding **of awareness** will occur.
  - Credit should be given for all actions (data gaps, source identification, source reduction, etc.) in order to get a handle on the problem for the next three years. The definition could change with the next permit as the conditions change. It is not possible to foresee what the real issues will be in the next permit cycle.
- H. What concerns or challenges would need to be addressed?**
- How to bring the Spokane Tribe back into the process. The Tribe was very active early on and it is important to continue to interact and include them.
  - At the end of the day there will need to be numbers.
    - There will be a difference of opinion as to what those are
    - There need to be reductions each year but the schedule is arbitrary as to what the goals are.
  - The importation and TSCA rules allow for the introduction of NEW sources, so not just dealing with old sources.
  - Technological challenges.
  - Getting all to agree on what MP means.
  - ~~Communicating the concept so everyone can~~ understand and educate that this is a huge watershed and everyone has a stake in it. There are other players involved, not just background sources, what about other sources (such as consumer products). There are many sources which are outside the dischargers control.
  - What if we get to background concentrations of PCB that are outside the control of the Task Force? What does MP mean in that context?
  - Example MP: The ECOS and TSCA Rulemaking efforts: how is this measured in finding compliance? It should be since it will have national and international impacts.
  - What if this happens: we define MP, the Task Force moves forward, “Deus Ex Machina” happens (something beyond our control), the definition does not meet expectations, this effort is

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perceived as failure in spite of the momentum, data, and all the work that has been accomplished? [This is a problem of creating a definition too early!!](#)

- ~~Money~~ Adequate funding, technology, politics (ideological barriers)

### ***I. What suggestions do you have for resolving those concerns or challenges?***

- Meet with the stakeholders.
- Communicate that this process of defining “measurable progress” is not a permit negotiation process. It is a listening for input.
- There are two ways agencies make decisions:
  - Get information, go into a black hole, provide answer
  - Collaborate, this is a very different process
- Having an open process with everyone having an interest and chance to be involved is good.
- Have robust discussions with the TF
- Come to agreement about MP
- Engage the Tribes [and stakeholders](#) so there is the same understanding
- Recognize that this as a greater national and international issue [– not limited to just Washington only](#)
- We are breaking old boundaries about the regulatory/discharger interactions
  - This can be more cost effective
  - In a trust building mode
  - Old school mentalities can muck up the situation (i.e., who will be reviewing the permits at the next cycle?)
  - Need to keep the relationship and trust building going.
- [Defining MP could be](#) is a wedge that could tear the trust building apart.
- This is looked at as unprecedented in the State and the US as a novel option for addressing WQ problems.
- Tax (to generate money for programs), incentives (to reduce public burden), and research (to develop technology).

### ***J. Do you have specific examples of something you are currently measuring that can be used to assess (directly or indirectly) reductions of PCB in the Spokane River?***

- Previously discussed, no new ideas.
- The City of Spokane and what they are doing via the Consent Decree
- Whatever is done with respect to the TSCA reform work.
- Groundwater monitoring (Kaiser)
- IEP/RiverKeeper/ECOS efforts in TSCA regulatory reform

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- Stormwater activities in the City – [catch basin clean out; analysis Union Basin; CSO integrated planning for reduction of CSO outfalls in the Spokane River and management of stormwater outfall ; LID program development; storm drain marking and public education and outreach](#)
- IEP Algae evolve
- County plant
- Clean ups at Upriver Dam and Donkey Island
- Avista removal of PCB equipment
- Research activities
- Idaho permits/monitoring of upstream/downstream; quarterly influent/effluent monitoring
- Kaiser removal of PCB, clean outs of lagoon, etc.
- Qualitative efforts
  - Formed Task Force [with dischargers, environmental groups, governmental agencies \(DOE, DOH, DOT, etc\) Idaho, EPA...](#)
  - [Create and implement MOA – to govern fair decision making](#)
  - Hired Facilitator
  - [2-day](#) Technical workshop
  - ~~Garnered~~ [Lobbied and obtained financial](#) legislative support of \$350,000
  - [Hired](#) Technical Advisor [to assist in review of data, studies and control measures, as well as assist in providing technical education information to the public](#)
  - [Submitted individual technical data to the technical advisor to start evaluation and identification of data gaps](#)
  - [Created and established a work plan](#)
  - ACE contracts
  - Permits issues/permit conditions.
- The SRHD relies on Ecology and Department of Health for the fish tissue data **and interpretation.**
- Local source control and urban waters do river sampling **and limited intervention and control.**
- **SRHD** could do a health risk assessment (epidemiological study) if there was funding. For example, prevalence of chloracne or endocrine disruption **occurrences in the community.** Confounding factors **of long term chronic risk influences and presentations** could make this difficult.

**K. What should we have asked that we did not? AND**

**L. Is there anything else that should be discussed or questions that you have?**

- Defining “measurable progress” needs to mesh with the 5-year permit cycle: how do we define measurable progress with a goal of achieving water quality standards and eliminating the fish consumption advisories?
- The definition should be developed in a rigorous manner: a long-term metric with staying power.
- There is a sense of urgency that we need to move forward on this. There should be a long/short term view of what “measurable progress” looks like in the next 6 months.

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- The SRRTTF allows for broad community buy-in that goes beyond enforcement structure towards universal participation.
- Build on successes.
- Take advantage of EPA enforcement
- What SRRTTF does applies as an example to the entire Columbia River Basin
- EPA intends to sign the MOA when the Idaho permits are final.
- IDEQ intends to sign the MOA when the Idaho permits are final.
- There will be possible revisions when the MOA is finalized.
- Keep EPA permit writers aware of the issues
- Standardized data analysis is needed. The QAPP that is developed by LimnoTech is a short term implementation goal. This will ensure that there is consistency in data collection.
- Community based problem solving is effective. Everyone lives here so there is a genuineness in the response to the problem.
- Is it worth it to disclose a price tag on the sampling that Ecology does (or other sampling?). PCB analysis is expensive **and public knowledge of this is limited.**
- This is an innovative process that we all learn from and could help the public understand better.