

The SRTTF poster is incomplete because it fails to apprise the public of the full story regarding PCB regulations for the Spokane River. We are particularly concerned that the Department of Ecology, as a regulatory agency, would fail to include complete information about water quality standards and the status of NPDES permits.

- Spokane River water quality standards (state and tribal) include not just numeric standards but also narrative standards (that reflect beneficial uses of the river). These standards require that the river be free from toxics in toxic amounts and available for fishing and fish consumption. The poster does not discuss these standards and how they are violated (as documented, for example by DOH fish consumption advisories, ATSDR documents, and so forth).
- The WA State Pollution Control Hearings Board has held that the Spokane County treatment plant NPDES permit violates state law because the plant has the “reasonable potential to violate water quality standards” and the permit lacks effluent limits to control PCB pollution. The Board rejected the argument that the SRTTF is a substitute for specific, enforceable standards for PCBs. The Thurston County Superior Court recently upheld the Board’s decision.
- Because the NPDES permits for all other Spokane River dischargers in Washington (Liberty Lake, Inland Empire Paper, Kaiser and City of Spokane) also do not contain PCB effluent limits, those permits may also be in violation of state law.
- The proposed poster’s comparison of state water quality standards is misleading and inflammatory and should be removed.
- Spokane River pollution dischargers (for example, Spokane County and Inland Empire Paper) should not be developing consensus-based “outreach materials” for regulatory agency sign-on.