

Comments on Coordinated Response to EPA

Borgias, Adriane P. (ECY) [ABOR461@ecy.wa.gov]

Sent: Thursday, May 28, 2015 3:51 PM

To: Whitman, Kara Michelle; Page, Chris

Cc: Rawls, Bruce [BRAWLS@spokanecounty.org]; Schmidt, Lynn [lschmidt@spokanecity.org]; Bud Leber [Bud.Leber@kaisertwd.com]; White, Jerry [jerry@cforjustice.org]; Sandy Phillips [sPhillips@srhd.org]; LaScuola, Mike [mlascuola@srhd.org]; John Beacham [jbeacham@postfallsidaho.org]; Bellatty, James (ECY) [JBEL461@ecy.wa.gov]

General Comments

Link to document: <http://srtrtf.org/wp-content/uploads/2015/05/SRRTTF-Work-Summary-draft-3-for-SRRTTF -5-27-2015.docx>

The information that EPA requested is what the TF has achieved in the way of source reduction. This includes direct activities of the Task Force and also activities of the individual participants. The TF is positioned to be the catalyst for source reduction activities that are undertaken by individual members. The collaborative process makes it happen (to quote the City, "Cleaner River, Faster"), and the sum effect if the actions is greater than the whole.

The most important piece of information in this response is presented at the end (Page 5 – Task Force Maintains the Focus on PCB Sources and their Reduction and Elimination) and Attachment C – Permittee PCB Reduction Activities (not yet provided). This information should be at the front for more impact.

The sample and analysis information is great but could be abbreviated. The message that I perceive to be important is:

- There were a lot of unknown questions.
- The TF had a successful sampling event that achieved its goal of "a semi-quantitative mass balance assessment" that answered important a data gaps and identified areas of concern.
- The TF is moving forward on them with the goal of source identification, evaluation, and Best Management Practices.
- More studies generate more questions, and more studies, but there is an end date (2016) which will result in a Comprehensive Plan.

Specific Comments:

Page 1 footnote: specify that this is a City of Spokane estimate.

Page 1, Last paragraph: per question raised at the Task Force meeting. Here is some clarification on "membership". MOA signatories = members. Ecology is the only nonvoting member. All others serve in an advisory capacity (directly or indirectly) or are participants.

Members of the Task Force are:

- NPDES permit holders in WA and the City of Coeur d'Alene
- Lake Spokane Association, Lands Council, Spokane Riverkeeper
- Department of Ecology, Department of Health, and Spokane Regional Health District.

Idaho DEQ, USEPA, Avista and tribes have advisory roles.

City of Post Falls, HARSB, Washington DOT, and City of Spokane Valley are regular participants.

Page 3, Data collection strategy:

The statement: "This strategy allowed the development of mass balances for each river segment between river flow gages so that the contribution of PCB loads via groundwater could be determined. Once groundwater

contributions were quantified, monitoring during wet weather conditions would allow quantification of stormwater loads,” is not correct. We have already determined that it would be difficult to get meaningful information using similar monitoring techniques during wet weather.

The purpose of the data collection was to do a **semi-quantitative** mass balance assessment in order to identify stream reaches where incremental loads lead to a significant increase in river concentrations.

FROM the QAPP:

- a. The data shall be sufficient to support a semi-quantitative mass balance assessment, and be able to identify stream reaches where incremental loads lead to a significant increase in river concentrations.
- b. The data shall be sufficient to support an adaptive management approach, where grab sample results can be directly compared to results from other sampling methodologies to allow determination of an improved monitoring approach for future phases of this work.

Page 5: “Task Force Maintains the Focus on PCB Sources and their Reduction and Elimination.”

This is what EPA originally asked for and is the most important piece of the document. It needs more specific data. Succinctly list the notable accomplishments and how they are achieving source reduction.

These are what I perceive to be highlights from a good list:

- Low flow synoptic sampling has shed light on previously unidentified areas of the river where there is groundwater contribution of PCBs. The Task Force has authorized future evaluation of these areas that will direct source removal efforts.
- The hydroseed project demonstrates the necessity of the collaborative effort: Ecology provided a grant to the City of Spokane, City of Spokane finds PCB in hydroseed, Task Force engages the manufacturers and state agencies (Ecology, DOT, DES) for the purposes of identifying and implementing a Best Management Practice. Also has regional and national implications.
- Consistently supported efforts to regulate inadvertently produced PCBs, which are allowable in concentrations well above the water quality standard. (Source reduction during the manufacturing process is the only way we can achieve the WQS).

Page 6: Here is some information that might help frame this discussion:

- Definition of credible and scientifically defensible: See p. 3 http://www.ecy.wa.gov/programs/wq/qa/wqp01-11-ch2_final090506.pdf
- How a waterbody is assessed and listed/delisted: See pg 47 for PCB. <http://www.ecy.wa.gov/programs/wq/303d/WOpolicy1-11ch1.pdf>

Page 7: TMDL Actions Pose an Uncertain Future:

- EPA’s long term vision on collaborative processes (may be appropriate at the beginning to align what we are doing with EPA’s stated vision): http://water.epa.gov/lawsregs/lawsguidance/cwa/tmdl/upload/vision_303d_program_dec_2013.pdf
- As a final note: this website <http://www.epa.gov/waters/ir/> shows the number of impaired water bodies for PCBs in a variety of ways. Only about 10% of the impaired waters have a PCB TMDL. To date, no water body has been listed as impaired for PCB and achieved the status of meeting water quality standards . . . whether or not there was a TMDL. (There are some water bodies listed as having achieved water quality

standards but upon further inspection, these were all listing errors that were corrected).

Adriane Borgias

Spokane River Water Quality Lead
Washington State Department of Ecology
Water Quality Program - Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205-1295
(509) 329-3515

This communication is public record and may be subject to disclosure as per the Washington State Public Records Act, RCW 42.56.