My Intro thoughts:

**Example of document with this in alternate format:**

In 2011, the Department of Ecology (Ecology) issued NPDES permits for all Spokane River wastewater dischargers in Washington, including the new Spokane County wastewater treatment facility. These permits require that performance-based PCB limits be established within the first permit cycle and require participation in the Toxics Task Force. The goal of the Task Force will be to develop a comprehensive plan to bring the Spokane River into compliance with applicable water quality standards for PCBs.

The NPDES permits specify that if Ecology determines that the Task Force is failing to make measurable progress toward meeting applicable water quality criteria for PCBs, Ecology would be obligated to proceed with the development of a TMDL in the Spokane River for PCBs, or determine an alternative to ensure water quality standards are met.

In 2015, EPA issued permit for the dischargers in Idaho requiring participation in the Task Force.

In addition to the NPDES permittees, members participating in the SRRTTF include conservation and environmental interests including Lake Spokane Association, Spokane Riverkeeper and the Lands Council; Spokane Regional Health District; Ecology; Idaho DEQ; Washington State Department of Health; the Coeur d’Alene Tribe;;and USEPA. By late 2012, the Task Force was sufficiently organized so that it could begin functioning, they developed an MOA (Attachment A), a funding entity, and procured a national expert as a community technical advisor for the important work it was undertaking.

***Specific Task Force Goals, actions, and timelines relating to NPDES Permit Compliance***

The SRRTTF initially created a work plan that broke out the overall scope of the work into four “phases”. Measurable Progress in the reduction of PCBs can be seen with in the context of these four phases.

***Phase 1***

*In April 2013, the Task Force engaged LimnoTech, a firm renowned for their expertise on the fate and transport of PCBs, as a technical advisor to assist with the development of an initial scope of work for its technical efforts. These initial “Phase 1” efforts included compilation of all PCB data that may be relevant for characterizing either potential PCB source contribution or instream PCB conditions, review and evaluation of the compiled data for future use, an analysis of the data to identify data gaps that were critical to developing a clear understanding of current conditions, and the development of a data collection strategy and the companion sampling, analysis, and quality assurance plans.*

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| **Specific Task Force Goals Relating to NPDES Permit Compliance (see attached MOA)** | **Phase 1 – Actions:**  **Amass data, assess data and determine gaps, generate QAPP and models** | **Status** | **Results/Checkpoint** | **Timeline** |
| Initial Task Force funding will be confirmed. | Ruckelshaus is retained to facilitate project  Initial Task Force funding is secured | Completed | ## | ## |
| Development of a 2012 through 2016 Task Force work plan | Adoption of SRRTT of Work Plan | Completed | Work is underway | ## |
| Identification and contracting with appropriate staffing. | Limno Tech is retained for tech work and guidance  Ecology dedicates staff to SRRTTF | - Limno Tech is retained for to assist with the development of an initial scope of work for its technical efforts.  - $$ secured for funding.  This is completed - April 2013 | Limno Tech is currently working on goals of SRRTTF:  **See work plan attached** | ## |
| 1. Approach for and analysis of existing data on PCB and other toxics on the  Washington 2008, Category 5, § 303(d) list to (1) understand what is known,  (2)identify data gaps, and  (3) determine where additional characterization of amounts, sources and locations is needed. | 1. Compiled known and relevant PCB data for the Spokane River  development of a Quality Assurance Project Plan (QAPP) and a Sampling and Analysis Plan (SAP) for Phase 2, dry weather (base-line) sampling  2. Data Gap Analysis conducted  3. Data Collection Strategy | 1. Completed  2. Completed  3. Completed | 1. An inventory of existing groundwater, stormwater, point source discharges, and river and lake sampling data was compiled  Ecology Data Base…  Ecology document #  Ecology Doc #  2. An inventory of missing information (data gaps) was developed using a conceptual model for the river that considered potential sources and source pathways.  •The magnitude of true sources contributing to stormwater loads  •The sources between the outlet of Lake Coeur d’Alene and the Idaho/Washington state line  •Loading from atmospheric sources  •Loading from groundwater sources  3. Exists and guides sampling strategy  (see Phase 2, below) | 1. April 2011  2. ??  3. ?? |

***Phase 2***

*The Task Force has completed approximately half of the Phase 2 data collection work to address data gaps and to create an adequate data set to characterize and quantify PCB sources. It is anticipated that this step will be completed by XXX. This data collection phase also needs to evaluate wet season contributions to the Spokane River to determine seasonal variations in PCB loadings. In addition, the concentration of PCBs in groundwater needs to be measured across the Rathdrum Prairie Spokane Valley Aquifer to better estimate PCB loading into the Spokane River and Little Spokane River. Finally, the effect of aerial deposition as a source needs to be evaluated to characterize whether aerial deposition is a significant source of PCBs into the Spokane River.*

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| **Specific Task Force Goals Relating to NPDES Permit Compliance (see attached MOA)** | **Phase 2 Actions:**  **Collection of Additional Data** | **Status** | **Results** | **Timeline**  **Start: 4/2012**  **Finish: ???** |
| Development and implementation of a Monitoring Plan for the Spokane River that,  (1) establishes the baseline conditions for PCBs and the other identified toxics,  (2) monitors and assesses the effectiveness of toxic reduction measures, and  (3) can be adapted to take into account newly generated data and sampling techniques. | 1. Conducted dry-weather synoptic survey of PCB concentrations in water column of Spokane River between State line and 9 mile.  2. Collection of approximately 70 water samples from both instream locations as well as point sources and flow data at each river segment. (see findings – page #)  In addition to PCBs, analyses were also conducted for at least six other general water quality parameters. | 1. **Completed**    **2. Completed** | Initial analysis of new data highlight a few noteworthy findings:  •Between the Barker Road and the Trent Avenue Bridge sampling locations on the river, river flow increased by an average rate of 362 million gallons per day over the two week monitoring period due to groundwater flowing into the river  •From the mass balance calculations for this segment of the river (Barker Road to Trent Avenue Bridge) the average PCB loading to the river was about 273 mg/day  •The PCB loading from groundwater flowing into the river for this segment of the river represented the single largest mass source (mg/day) measured during the synoptic sampling event  •Although river flow data at the Greene Street gage could not be collected during the sampling event, flow estimates for that location indicate the possibility that a second segment (Greene Street to Spokane Gage) may exist where groundwater flow into the river could be contributing a PCB load. | - August 2014 - completed |
| **#** | **#** | **#** | **#** | **#** |

***Phase 3***

*In Phase 3, the Task Force will characterize and quantify the identified sources of PCBs entering the Spokane River. This phase will be completed by XXX. It is anticipated that these sources will include all of the point sources such as the wastewater treatment facilities that discharge to the Spokane River. Also included will be consideration of non-point sources such as stormwater, groundwater, and perhaps aerial deposition.*

*The characterization of the point sources will include an evaluation of the PCB reduction measures that are anticipated to result as each wastewater treatment facility implements their next level of treatment as required under their NPDES permits to comply with the Spokane River Dissolved Oxygen TMDL.*

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| **Specific Task Force Goals Relating to NPDES Permit Compliance (see attached MOA)** | **Phase 3 - Actions**  **Characterize and quantify the identified sources of PCBs entering the Spokane River** | **Status** | **Results** | **Time lines** |
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***Phase 4***

*In Phase 4 of the initial Work Plan, the Task Force will summarize the identified sources of PCBs into the Spokane River. For each identified source, a range of Best Management Practices (BMPs) that can eliminate or reduce the source of the PCBs will be identified with recommendations for implementation. This phase will be completed by XXX.*

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| **Specific Task Force Goals Relating to NPDES Permit Compliance (see attached MOA)** | **Phase 4 - Actions**  **Assess BMPs and Develop a comprehensive Plan** | **Status** | **Results** | **Time lines** |
| ### | ### | ### | ### | ### |
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**Ancillary work accomplished by the SRRTTF**

Write-up on outreach Activities