

Compiled Comments on LimnoTech Comp Plan Scope

It would be beneficial if the plan contains a discussion of the following components:

- A description of the management measures.
- An implementation schedule and measurable milestones.
- A description of criteria used to determine loading reductions achieved over time.
- An information/education component.

The County has significant concerns with the LimnoTech Draft Scope of Work. The County requests an additional three weeks within which to submit the County's comments. There is no urgency that compels the County (or any other member of the Task Force) to provide comments under the short timeframe requested and we would appreciate the extension. The County's initial comments, which of course are subject to change as we continue our review, are as follows:

- 1) The objective of this Scope of Work should be the preparation of recommendations for consideration by the Task Force, in advance of the development of the Comprehensive Plan. It is premature to include the actual development of the Comprehensive Plan in this Scope of Work, as the nature and extent of the Plan will vary based upon the recommendations that are acceptable to the Task Force. Assuming that LimnoTech will be only providing recommendations, the following are additional initial comments from the County:
- 2) The completion dates for Task 1 deliverables should be listed in the project schedule.
- 3) The schedule for completion of the deliverables is overly optimistic. Draft Task 2 deliverables are due on February 5th, just one month after initiation of the project. Assuming draft Task 1 deliverables will be completed before Task 2, a significant amount of work will be compressed in one month. A more realistic schedule should be developed.
- 4) The schedule for the proposed scope of work does not align well with the ongoing technical work that will be important to the source assessment. A final report of the 2015 dry weather sampling is scheduled for February 28th. This will make it difficult to incorporate analysis of the 2015 data agreed upon by the Task Force members into the assessment of the sources.

The Scope of Work should be based off of the description of the Comp Plan in the Task Force approved 2012 Workplan. As the "EPA Submittal to the Judge" is not binding or finalized we should not reference it. If we need to adjust the scope of this project formally I believe it would be appropriate to do that at a later date. References to the EPA Submittal and direct quotations (bulleted items) should be removed from the SOW. While this may seem like a small detail, the uncertainty with the court case is setting us up to be chasing a moving target if we try to anticipate its outcome.

References to inventories of PCB sources should be changed to Inventories of known PCB sources

It would be useful to estimate the total known versus unknown inventory in addition to the uncertainty of the known values

The reference to “Spokane-Specific” data should be Spokane River-Specific

In addition to, or instead of, estimating the removal efficiency of BMPs the BMP section should estimate the magnitude or effect of the BMP on PCBs entering the river. Example: Reduction of 0.0002 g/yr into the river or 3% reduction of PCBs to the river.

Under Task 3, comprehensive plan items, the PCB Source Assessment should read: defines known ~~all~~ PCB sources and pathways

Control Options should be replaced with BMPs

To be consistent with the workplan, the Implementation Plan should read: Recommended Implementation Plan: Defines the specific BMPs recommended for implementation ~~control actions to be implemented~~, and the recommended schedule for their implementation.