

TECHNICAL CONSULTANT SUPPORT TO SPOKANE RIVER REGIONAL TOXICS TASK FORCE
PREPARATION OF COMPREHENSIVE PLAN
SCOPE OF WORK

September 23, 2015 DRAFT

This document describes the activities to be conducted by LimnoTech in support of preparing a comprehensive PCB control plan for the Spokane River Regional Toxics Task Force (SRRTTF) satisfying all elements specified by EPA in their submittal in response to ongoing litigation. The work plan is divided into sections corresponding to: 1) Technical Scope and Deliverables, 2) Budget, and 3) Schedule.

TECHNICAL SCOPE AND DELIVERABLES

Work will be conducted through four tasks:

1. Develop Inventory of PCB Sources and Pathways
2. Evaluate Best Management Practices
3. Develop Comprehensive Plan
4. Meetings and Coordination

Each task is described below.

Task 1: Develop Inventory of PCB Sources and Pathways

LimnoTech will compile a detailed inventory of PCB sources (i.e. how PCBs are introduced into the watershed) and pathways (i.e. how PCBs are delivered to the river) by source category and location. Work will begin with a technical memorandum defining the range of sources and pathways to be considered. This inventory will be based on the conceptual model of PCBs in the Spokane River watershed developed during Phase I, review of PCB literature generated after the development of the conceptual model, and input from SRRTTF members. Once the inventory of sources and pathways is finalized, LimnoTech will estimate the magnitude of load associated with each source. These magnitudes will be estimated based upon observed Spokane-specific data wherever possible, and supplemented with literature values for sources where site-specific data are unavailable. Loading magnitude estimates will be expressed in terms of ranges, to reflect the uncertainty inherent in each loading estimate.

Deliverables:

- Draft memorandum defining inventory of sources and pathways to be considered.
- Final memorandum defining inventory of sources and pathways to be considered.
- Draft memorandum defining magnitude of loading from each source and pathway.
- Final memorandum defining magnitude of loading from each source and pathway.

Task 2: Evaluate Best Management Practices

Similar to Task 1, this work will begin with an inventory of Best Management Practices (BMPs) to be considered, followed by an assessment of the cost and PCB removal efficiency of each BMP. The term "Best Management Practice" is defined broadly here to consider both point and non-point source controls. Under the first part of this task, LimnoTech will define the range of BMPs available for remediating PCBs from the sources and pathways identified in Task 1. The BMP inventory will be based

upon input from SRRTTF members, review of the scientific literature, and existing PCB control plans developed for other watersheds. Once the inventory of BMPs is finalized, LimnoTech will estimate the cost of implementation and expected pollutant removal efficiency for each BMP. It is expected that SRRTTF members will be the primary source of information related to costs of BMPs that they are considering for implementation. For cases where no local information is available to assess costs of specific BMPs, these costs will be estimated based upon the costs associated with their use in other watersheds.

Deliverables:

- Draft memorandum defining inventory of BMPs to be considered.
- Final memorandum defining inventory of BMPs to be considered.
- Draft memorandum defining cost of implementation and expected pollutant removal efficiency for each BMP.
- Draft memorandum defining cost of implementation and expected pollutant removal efficiency for each BMP.

Task 3: Develop Comprehensive Plan

LimnoTech will develop a Comprehensive Plan that satisfies all elements specified by EPA's submittal in response to the Order issued on March 16, 2015 by the U.S. District Court in *Sierra Club, et al. v. McLerran*, i.e.:

- Summary of the available data for PCBs in Spokane River water, fish tissue, and sediments.
- A list of the identified sources of PCBs in the Spokane River with estimates of current loadings.
- A range of BMPs expected to reduce or eliminate PCBs for each source or category of sources.
- Recommendations for BMP implementation.
- Recommendations for future studies to address remaining data gaps.

The comprehensive plan will contain sections on:

- **Watershed Characterization:** Describes the environmental setting (e. g. population, land use, surface and groundwater hydrology), available data, and impairment status.
- **PCB Source Assessment:** Defines all PCB sources and pathways and their respective magnitudes, along with key data gaps.
- **PCB Control Options:** Defines the control options under consideration, and the expected costs and removal efficiency of each option.
- **Implementation Plan:** Defines the specific control actions to be implemented, and the schedule for their implementation.
- **Future Studies:** Describes future monitoring activities designed to assess implementation effectiveness fill identified data gaps.

As discussed in Task 4 below, selection of the specific control actions to be included in the comprehensive plan and the schedule for their implementation will be defined in a consensus-based manner as part of mid-project workshop.

Scope of Work Development of SRRTTF Comprehensive Plan - 9/23/2015 draft

Deliverables:

- Draft comprehensive plan
- Final comprehensive plan

Task 4: Meetings and Coordination

This task covers all meetings and other project coordination, including monthly project status reports and routine phone participation in all SRRTTF and TTWG meetings. LimnoTech will participate in two in-person meetings with the SRRTTF and Ecology staff, described below under deliverables.

Deliverables:

- Meeting presenting the control options under consideration and their expected costs and removal efficiency, designed to facilitate a consensus-based process to define which options to include in the comprehensive plan.
- Meeting presenting the draft comprehensive plan, to solicit and discuss comment prior to preparation of the final plan.

Budget

The budget is currently estimated as \$145,000, divided by task as follows:

1. Develop Inventory of PCB Sources and Pathways: \$40,000
2. Evaluate Best Management Practices: \$30,000
3. Develop Comprehensive Plan: \$40,000
4. Meetings and Coordination: \$35,000

Schedule

The period of performance of this scope of work is expected to be January 2016 through December 2016. The completion dates associated with each task and deliverable are tabulated below, assuming a January start date.

Task: Deliverable	Completion Date
1: Draft memorandum defining inventory of BMPs to be considered	February 5, 2016
1: Final memorandum defining inventory of BMPs to be considered	February 26, 2016
2: Draft memorandum defining cost of implementation and expected pollutant removal efficiency for each BMP.	May 20, 2016
2: Final memorandum defining cost of implementation and expected pollutant removal efficiency for each BMP.	June 24, 2016
3: Draft comprehensive plan	August 19, 2016
3: Final comprehensive plan	December 16, 2016
4: Meeting to Define Control Options	July 22, 2016
4: Meeting to Present Draft Comprehensive Plan	August 26, 2016