Spokane River Regional Toxics Task Force
DRAFT Summary Notes | Wednesday November 18, 2015
Spokane County Water Resource Center | 1004 N. Freya Street | Spokane WA

Attendees

*Voting Members and Alternatives (*Denotes Voting Members)*

Tom Agnew * – Liberty Lake Sewer and Water District
Jeff Donovan – City of Spokane
Adrienne Cronebaugh* (phone) – Kootenai Environmental Alliance
Doug Krapas* – Inland Empire Paper
Bud Leber* – Kaiser Aluminum
Don Keil* (phone), Kris Holm – City of Coeur d'Alene
Dave McBride*(*phone*) – Washington Department of Health
Dave Moss*, Ben Brattebo, Mike Hermanson – Spokane County
Mike Petersen*– Lands Council
Jerry White*– RiverKeeper

Advisors

Adriane Borgias, Holly Davies, Jeremy Ryf, Alex Stone (phone) – WA Dept. of Ecology (Ecology)
Kevin Booth – Avista
Brian Nickel – U.S. Environmental Protection Agency (EPA)

Public/Interested Parties

John Beacham – City of Post Falls
Lisa Dally-Wilson – Dally Environmental
Dave Dilks (*phone*) – LimnoTech
Eric Williams – Gallatin Public Affairs
Ken Windram – Hayden Area Regional Sewer Board

Intros, Agenda Review, Acceptance of Prior Meeting Summary

October 21, 2015 Summary Notes Draft:

- Page 2, 2nd bullet & Page 4, "Task Force members would like a summary of the EAP work on PCBs and groundwater" (posted here on October 20: http://srrttf.org/?p=5355)
- Also, comment only about "doing a wet weather sampling" concurrent with air deposition sampling on page 5.
- The decision on the notes will be postponed until the December Task Force Meeting

ACTION ITEM: Kara Whitman to make edits to the Oct. 21, 2015 meeting summary. (COMPLETE)

Technical Track Work Group (TTWG Report) and Technical Topics:

Data accessibility

County comments on the QAPP and associated documents:

In November, the TTWG discussed final reports LimnoTech sent to the Ecology as part of their contract. These documents were posted on the Task Force website as "final" documents but got no formal Task Force review. Spokane County reviewed the documents and sent a memo to the Task Force and LimnoTech outlining revisions for and comments on the documents, expressing that the comments should inform subsequent sampling efforts and reporting. The documents have been posted for additional review from other SRRTTF members. Given the highly technical nature of the comments, TTWG will discuss how to address comments on Dec 2nd.

ACTION ITEM: Ruckelshaus Center to send announcement asking for review of the documents and County's comments. All comments to Ruckelshaus by c.o.b. 12/1/15. (COMPLETE, no additional comments received).

Procedures for Requesting Data from SRRTTF-related sampling efforts:
The TTWG discussed accessibility of data prior to quality assurance and quality control (QA/QC) and decided this topic should be addressed by the full Task Force. The Task Force agreed that data QA/QC'd by LimnoTech is more appropriate for public dissemination; however, this depends on how much time passes between samples going to lab, analysis and results returned by lab, and then lab data going through QA/QC. The group agreed it is a high priority to get all data QA/QC'd into a management tool everyone can query. This topic will be addressed by the Data Management work group and at the February 2016 workshop.

Until a data management tool is chosen for the SRRTTF, the group agreed the following protocol should be used by all SRRTTF members in requesting and obtaining data collected:

1. LimnoTech 'looks' at data from AXYS and gives it a preliminary "OK".
2. That data then gets posted on the website in digital format with a disclaimer stating that these data are preliminary and subject to further QA/QC.
3. LimnoTech receives data from AXYS (via Bud Leber) over a period of weeks/months.

Note that this is a change in LimnoTech's protocol. LimnoTech would prefer to post all of the data from a sampling effort at one time rather than piecemeal.

Synoptic Survey & Groundwater Data: Reports on Results
Synoptic Survey: Dave Dilks presentation
Dave Dilks explained that most of the data has been received from AXYS, but results are preliminary as a final data QA/QC has not been completed. There were two laboratory blanks with high levels of PCBs that need addressing. Dave recommends sending archived samples to AXYS for reanalyzing. **Q.** Will AXYS foot the bill for this as the contamination came from their lab blanks? **A.** Dave will ask AXYS.

LimnoTech is confirming 2014 data, still waiting on Greene Street data. 40% of the data must be rejected because of high lab blank contamination. Cost? The next steps are to receive the remaining data from AXYS for Greene Street, conduct a full QA/QC and then perform the mass balance calculation.

Q&A/Comments

- Acceptable levels of contamination? Method blank 127 pg/l total. That is the Task Force threshold. Field blanks came in under that level; could they be used for blank correction?
- Timeline for next steps? Not sure on the timeline for the Green street data. Could use field blanks and crunch the numbers faster, unless they reanalyze samples. (Could take a few months with new samples).
- Lab blank represents contamination of lab contamination, so it's a good idea to look at field blanks.

ACTION ITEM: LimnoTech to contact AXYS about cost and options of rerunning these samples, to bring to next Technical Track Work Group meeting (TTWG). TTWG to make a decision on how to proceed. Dave Dilks will also look at the numbers using the field blanks as an alternative to the lab blanks and bring to TTWG meeting for discussion (violating the QAPP, but may be necessary given the timeline). (COMPLETE)

Groundwater/Seep Sampling
Mike Hermanson described the groundwater sampling executed by Ecology and the County: two springs and four wells. Ecology's Urban Waters Program funded the study, while the County provided both staff time for analysis and access to sampling sites. Samples were taken across the top of the aquifer. The sites were chosen due to their location in relation to the gaining reaches in the river. The data show very low PCB levels in the

aquifer; however, pronounced contamination from PCB-11 showed up in lab and field blanks. The highest value besides the lab blank was the field blank. There were two slightly elevated results for PCB-7, of 21 picograms per liter (Waikiki Springs) and 24 (Sullivan Park). The County and Ecology are discussing next steps including two additional rounds of sampling. They would like to capture winter and spring flow regimes at the same locations and some additional locations. They plan to reduce the number of field blanks. The County and Ecology will put together a memo with all the sampling activities, well logs, etc.

Wet Weather Sampling:
The group briefly revisited the possibility of doing wet weather sampling. This had been previously listed as data gap from last year's workshop and had been scoped by LimnoTech. Dave explained that wet weather sampling may have some use, but not for a mass balance calculation. The Task Force is not likely to get a PCB mass balance for stormwater out of the study. The group decided that TTWG should discuss whether to do this.

Q&A/Comments

- **C**. Safety could be an issue during high flow; we may need to modify sampling protocols.
- **C**. Look at flow estimations of the aquifer at these locations? Low numbers X high flow is significant.
- **C**. Sampling at gaining locations is a good idea; the Task Force also has new flow measurements options with the newly installed gauges and will have better measurements moving forward.
- **Q**. Why are we not seeing a signal in groundwater measurements, given that a signal appeared during the synoptic events? **A.** We have not sampled Groundwater where a signal of PCBs shows in the river; this was a "snapshot". Some of the sites were chosen because of Pam Marti's study (Toxics Control Program sites).

ACTION ITEM: The TTWG and LimnoTech to work out details of wet weather sampling and make contact with Gravity regarding this work. The Task Force to make decision in December on wet weather sampling.
ACTION ITEM: Dave Dilks to put together some options to discuss at the work group. (COMPLETE)

State Product Testing Data
Alex Stone gave a presentation on the **DRAFT** State Product PCB testing results. The study looked at caulk, pesticides and other lawn products, plastics, clothing, printed paper products, plastic containers, office products, paper labels and containers, pigments and dyes, and other miscellaneous products. They have 35,000 entries to go through, QA/QC to do. The study steered toward yellow products, and collected 216 samples from products purchased through the State Contract with Department of Enterprise Services (DES), the majority of which were paper labels and containers. The analysis used method 1668 and looked at total PCB concentration. 73% of the samples were 1 ppb or higher. For total PCBS, 36.1% were greater than 10ppb and 5.1 % of samples greater than 110 ppb for total PCBs. The study may raise more questions than answers. Next Steps: Complete graphs, compare results by class, review results on specific products, partner with Ecology in Spokane do a statistical review. Timeline: all complete by end of December except the statistical analysis.

Q&A/Comments

- **Q.** what is the exposure of each of these products to water? Do the PCBs leach to the environment? **A**. Ecology does not typically look at leaching.
- **C.** Incinerator or recycle? When effluent is characterized, PCB-11 is most prevalent. Need to emphasize the use of dyes and pigments that don't have PCBs.
- **Q**. When will data be available? **A.** After QA/QC and publishing. Ecology will use this information because of recommendations from the Chemical Action Plan; Ecology will release a press release and do an alternatives assessment for PCBs and dyes (if funded). Working with DES, and City of Spokane purchasing.
- **C.** If the Task Force has specific things to look at, send them to Holly Davies or Alex Stone.

- **Q**. Did the study look at a significant number of single products to see if there is a range? **A**. No.
- **Q**. Do PCBs in clothing come out the first time they get laundered**? C.** This would be a shifting of the burden. Have no control over a manufacturer. We evaluate the product delivered on the contract.
- **C**. We need reform to the Toxics Substances Control Act (TSCA). Be sure look at more than one sample of the same product. Be careful not to throw any supplier under the bus.
- **C.** Can Brian Nickel or another representative of Region 10 EPA advocate reform to TSCA? **A.** Holly Davies met with Jim Jones, and talked to him about inadvertent generation. They have meeting with EPA headquarters and will keep them informed. This could be powerful if there is a Region 10 champion for this change. If the Task force can show that what is in the river matches what is in the products, it may make more sense to EPA that TSCA reform is needed.

ACTION ITEM: Alex Stone to present final analysis in February of 2016.

Workshop: Confirm Dates, Experts, Volunteers
Lisa Dally Wilson said the next technical workshop will be a 2.5 day workshop. The small planning workgroup is targeting Feb. 9-11th. Task Force members should let Lisa know if there are experts on these topics that should be on the list of invitees.

ACTION ITEM: Task Force members asked to send any additional items needing covered at the workshop.

Comp Plan Scope, Timeline, Cost Estimate—*Decision: Approve Scope of Work?*
John Beacham suggested a slight revision to the scope: "*The plan will estimate pollutant loading into the watershed and the expected load reductions, establish reasonable time limits for correcting the specific problem, and include ~~including load reduction or~~ interim targets when appropriate. The plan will include an adaptive management component to allow for course corrections if necessary.*"
DECISION: The Task Force accepted the Comprehensive Plan Scope and Cost Estimate with John's edit.

Best Management Practices (BMP) Work Group
The BMP work group met, but did not have an NPDES permittee participate. The group requests that a discharger/NPDES permittee be on the workgroup. Adriane gave an overview of the BMP work so far: they looked at the Clean Water Act (CWA) definition of "What is a BMP?" There is a range, which allows for flexibility in what gets included in the comp plan. The workgroup provided a summary of their first meeting, including a list of useful links/tools (San Francisco Estuary Institute has options that could be easily done in the Spokane River Watershed). The workgroup would like Task Force members to look at the BMPs that resonate with them.

ACTION ITEM: Jeff Donovan to check on who might be able to participate in the work group. Adriane to contact AVISTA about participation. County to participate in the workgroup (rep may vary). (COMPLETE)

Q&A/Comments
- **C.** Challenge in implementation. Are there any sources that point to a specific BMP?
- **Q.** Is this in the scope of work for LimnoTech? **A.** Yes. They are part of the work group. The Task Force has agreed to work collaboratively with LimnoTech on developing the list of BMPs for the comprehensive plan.

Grant Support Letter—*Decision: Approve Letter of Support for Grant Proposal by Lands Council (to EPA)?*
At the last Task Force meeting, the Lands Council requested a letter of support from the Task Force for a grant proposal. Mike LaScuola drafted this letter of support, and it has been reviewed and revised by the Education and Outreach work group.

DECISION: The Task Force approved the letter, with cleanup and a catchier title. Ruckelshaus Center to put letter on Task Force letterhead, make minor edits (as discussed in meeting), and send to Mike Petersen. (COMPLETE)

Funding Work Group: Two other grant opportunities (funding work group notes posted: http://srrttf.org/?p=5442).

ACTION ITEM: The Funding Work Group to put together a proposal for decision in December.

Spokane River / SVRP Aquifer Connections:
Rob Lindsay briefed the Task Force on the interchange of the Spokane Valley Rathdrum Prairie (SVRP) Aquifer and the Spokane River, focusing on the big picture. Much of the information that Rob presented is from the Aquifer Atlas, US Geological Service, and the Idaho Department of Environmental Quality. The aquifer consists of sand and gravel and water, with few fine grains (there is a clay layer in the Hillyard Trough). The Coeur d'Alene, Southfork and Clark Fork rivers feed the Spokane River/SVRP Aquifer.

Other highlights from the presentation:
- The Aquifer discharges into the Little Spokane River (about 100 cfs per day).
- The gaining and losing reaches of the river are very predictable.
- Age of water: samples collected east of the state line since 1998 show that all the water is less than 20 years old. (For comparison, the water in the west of the Great Plains is 10,000 years old).
- Compared in-river PCB concentration from 2014 synoptic sampling (discharger concentrations in green, at http://srrttf.org/wp-content/uploads/2015/11/aquifer.Spokane-_presentation.pdf).
    - In the gaining reach there is a jump in concentration, perhaps some sort of loading from the aquifer in this area. After Greene Street, it is not quite as clear (some dilution near Trent and Greene Street).
    - The groundwater sampling locations were selected to evaluate impacts to the river in gaining reaches.

Q&A/Comments
- **Q.** given this is young water, snow pack, rates of recharge, and climate change… are people talking about the quantity of future recharge**?** **A.** There is not general agreement; the newer Federal Energy Regulatory Commission (FERC) dam relicensing agreement with AVISTA specifies 200 additional cfs of recharge compared to the original agreement, and this appeared to put more water in the aquifer.
- **Q**. Stratification of the age of the water? **A**. Not sure, but think it was screened across the top of the aquifer. County has not seen sign of age stratification in the screened wells.
- **Q.** If young waters, does that mean PCBs are new? **A.** Groundwater samples collected by the County and Ecology (discussed earlier in the meeting) were relatively low.
- **C**. On the Kaiser site, there are different levels of PCBs with varying aquifer depth.
- **Q.** What is the discharge mechanism? **A**. Could be more of a bowl or weir mechanism near Trinity Trough.

Events & Outreach, Funding
- March Task Force Meeting: Our GEM (Lake Coeur d'Alene symposium) and River Forum conflict with regular SRRTTF meeting date. The group agreed to meet March 16th.
- Outreach workgroup:
    - Calendar events ahead of time so the Task Force can staff events ahead of time
    - Revising Task Force Posters and presentation, and putting together Task Force YouTube clips. To be completed by the time of the Spokane River Forum in March 2016.

Announcements and Updates

- Brian Nickel updated the group on the lawsuit: the court issued an order concerning the plaintiff's motion (repackage of their motion for additional relief). Court will consider EPA motion to dismiss on Nov. 23. December 18th- replies. Defendants reply Jan. 11th 2015. The court has not gotten into the merits of EPA's reply; it is all procedural at this point. Several parties are appealing to the Ninth Circuit Federal Court; the Sierra Club told the judges at the circuit court that those parties' appeal should not move forward.

ACTION ITEM: Push consideration of October Task Force meeting notes to December.

ACTION ITEM: December meeting to be held on December 16th.

No public comment

The next SRRTTF meeting is Wednesday December 16, 2015 at Liberty Lake Sewer and Water District
The next Technical Track Work Group meeting is December 2, 2015 at the Washington Department of Ecology.