

# SRRTTF Technical Track Work Group

Meeting Summary (DRAFT)

Wednesday, March 2, 2016 | 10:00 a.m. to 12:00 p.m.

Washington Department of Ecology | N. 4601 Monroe St. | Spokane, WA 99205

## Attendees:

Bijay Adams—Liberty Lake Sewer & Water District  
John Beacham—City of Post Falls  
Ben Brattebo—Spokane County  
Lisa Dally-Wilson (Video)—Dally Environmental  
Dave Dilks (phone)—LimnoTech  
Jeff Donovan—City of Spokane  
Bill Fees—WA Dept. of Ecology (Ecology)  
Ted Hamlin—WA Dept. of Ecology  
Mike Hermanson—Spokane County  
Kris Holm (phone)—City of Coeur d’Alene

Doug Krapas—Inland Empire Paper  
Greg Lahti—Department of Transportation  
Bud Leber—Kaiser Aluminum  
Dave McBride (phone)—WA Dept. of Health  
Dave Moss—Spokane County  
Chris Page (Video)—Ruckelshaus Center  
Sandy Phillips—Spokane Regional Health District  
Jeremy Rys—WA Dept. of Ecology  
Jerry White—Riverkeeper  
Kara Whitman—Ruckelshaus Center

## Introductions and Agenda Review

After a round of introductions, Chris Page went over the agenda. No changes were made to the agenda.

## Models Toxics Control Act with Bill Fees, Ecology representative for Toxics Cleanup Program (TCP)

Bill discussed the status of many sites on the list created by Martha Maggi and Pam Marti through the Environmental Assessment Program (EAP) and the state Environmental Information Management (EIM) system. Sites with heavy oil contamination were tested for PCBs. There were also sites where PCBs were found and released, but when toxicology information was not as advanced as it is now. Now more information and lab opportunities exist to look at smaller quantities of PCBs. Most sites got tested using EPA method 8080 methods (detection limit 1ppm in soil). This was when it was thought that PCBs were not very mobile. Remediation consisted of digging down until there was a non-detect, and hauling cleanup (15 ft. or less). Questions, comments and insights from discussion with Bill Fees:

- There are not many groundwater sites that have PCBs; cleanup levels are set for surface water standards on those with PCBs. Each site gets managed separately.
- For each cleanup, an order stipulates how cleanup will happen and the level of cleanup. Cleanup strategy and points of compliance get set up to best achieve those goals.
- If release has been reported: first investigate, then goes through site hazard assessment process.
- After site declared “No further action” (NFA): unless new data comes to light, the work is done typically with some restrictive covenants and post-monitoring requirements. General Electric still performs groundwater monitoring, putting data into EIM. in a policy change, some sites now can use EPA test method 1668.
- **Q.** How can we track down the unknown groundwater source the Task Force has discovered? **A.** Bill said it would be difficult to point out a site that could be at fault.
- **C.** Consider the Model Toxics Control Act (MTCA) and the “Applicable or Relevant and Appropriate Requirements.” Even if in compliance with the TCP and MTCA, a site cannot contribute to violations of the Clean Water Act (CWA). **A.** If the TCP has sites abutting surface waters, cleanup levels must comply with the CWA. Ecology sets soil concentrations protective of that cleanup level. It is hard to set cleanup levels protective of surface water when a site is distant from the river.

- **Q.** When there is an agreed order on a site, can it get changed? **A.** TCP uses agreed orders for remedial investigation/feasibility study process. Implementation of action-consent decree settles liability with the state, though these consent decrees contain reopen clauses. Restoration time frame must be considered.
- **C.** EAP memo notes that some are older sites, so some of them predate EIM (not sure if the older data has been put into EIM).
- **C.** The county: sampled groundwater at Spokane Community College, got values below lab blanks.

### **LimnoTech: Technical Work**

Dave explained that original samples tested higher-than-acceptable for PCB concentrations in lab blanks on two of the August 2015 sampling dates. The samples were reanalyzed using archive samples. The study looked at sites between Barker Road and the USGS gage in Spokane (five river stations, three dischargers) to repeat and confirm the mass balance. The data lies mostly within the range seen in 2014 samples, except the Mirabeau Park location.

The re-run samples were higher (*NOTE: Presentation slide 6 should be in pg/l, not ng/l*). **Q:** Is this due to blank correction? **A.** Dave will look into it and report back. Potential outliers in the data: two high samples at Mirabeau Park and Barker Road. Dave did not make a definitive statement about these data points. They can draw the same primary conclusion with or without the outliers. The study appears to have narrowed a source between the Mirabeau Park and Trent gages. There does not appear to be major PCB loading between Greene Street and Spokane and Trent.

### **Q&A/Comments**

- **Q.** Consider doing Mass Balance on a homolog basis? **A.** This was not part of scope; Dave would like to do this. **Q.** Estimated cost of this analysis? Dave will look into it and let the Task Force know.
- Previous data at Barker, outlier. What was the analysis before? Dave will double check this.
- **Q.** Task Force should have a strategy in its Comprehensive Plan for addressing cleanup sites. Including timeframes; what information does Dave need to look at a big picture strategy.
- **Q.** Does anyone need to be in the room to advise on connections between groundwater and river?

At its workshop, the Task Force discussed the needs to:

- Prioritize a more extensive congener/homolog analysis using existing data, and
- Develop a plan for taking advantage of all the data collected to date (Ted Hamlin can look into funding for this work through the Urban Waters Program).

Ted is also open to looking into TCP sites if it is useful in finding and reducing toxics. Bill Fees agreed to help where he can, but cautioned that some sites may not be ones that TCP is willing to reopen due to funding or means. Adriane recommended Dave put together a strategy for addressing potential legacy PCB sources from TCP sites via groundwater as an element to the Comprehensive Plan.

Dave Dilks and Lisa Rodenburg will discuss what can be done with existing data at an informal gathering of Task Force members in the afternoon of the “Our Gem” conference the day before the Spokane River Forum. This will not be an official Task Force meeting. Lisa Dally Wilson will lead the discussion, to be held from 2-5pm at the Coeur d’Alene Lake Resort.

### **Presentation: 2016 Monthly (not necessarily “wet weather”) Monitoring**

Dave Dilks explained that this is not necessarily “wet” weather sampling. There will be higher river flows than during the 2014 and 2015 synoptic sampling, and spring monitoring may capture snow melt, but

sampling may not coincide with precipitation events. The Quality Assurance Project Plan (QAPP) has been internally reviewed and approved and is out for signatures.

Dave discussed the proposed monitoring of particulate-phase PCBs (in sediment) suggested at the February Task Force meeting. Dave had thought it would not add a lot of time or cost, but after some discussion with Gravity and AXYS he does not think it would be a simple study. It would require field filtration (need a much larger volume, so three hours per sample and thus more consultant time), and the lab method requires consideration of not only solids concentration but the collection media. This can still be done, but will require more planning (and additional cost). Dave recommends this study be dropped for now. The Task Force can still do it study if they would like, but the information can also be acquired using other methods to approximate the difference between particulate and dissolved phase.

John Beacham: The Idaho NPDES permittees have to do monitoring for their permits. Can this be coordinated with the monthly monitoring to share costs and save time? They are using Gravity and AXYS, with basically the same QAPP. The samples that they need will cost about \$10,000.

**ACTION ITEM:** John to discuss the cost sharing idea with other Idaho parties, and pull together a proposal for discussion/decision at the March Task Force meeting. (COMPLETE, update: Other parties in Idaho did not agree to the proposal, so it got removed from the March Task Force meeting agenda)

#### **Workshop Action Items:**

Lisa Dally Wilson reviewed takeaways and action items from the Workshop. Many of these action items are already moving forward.

- The Task Force needs to take a condensed list of workshop action items not already moving forward—and prioritize. Some things should be done by the Task Force, but perhaps some of this other work should be done by another party (any by University researchers?).
- Short Term: Determine what is useful/needed for the Comprehensive Plan? What items are more long term items? Some of these items can be used as part of the Comp Plan section on Additional Data Needs.
- Jeff Donovan suggested mapping to see “low energy” areas to get an idea where sediment settles.

**ACTION ITEM:** Dave Dilks will dig into the Comprehensive Plan for April Task Force meeting and look for gaps and report back.

**ACTION ITEM:** Jeff Donovan to send the map to Ruckelshaus Center for use at the Spokane River Forum and future Task Force Meetings. (COMPLETE)

**Data Management:** Meetings to be announced on Task Force website (dates for meetings are set). The work group includes: Chris Donley, Ellie Key, Dave Dilks, Brandee Era-Miller, Rachel McCrae, Mike Hermanson, City of Spokane, hopefully Idaho DEQ—TBD (Bob Steed?), and Adriane Borgias.

Meeting Schedule:

- March 9, 10-12
- March 30, (no video conf. this day) 10-12
- April 13, 10-12
- April 20, from 10-12

#### **Jerry White: Draft comments on EPA NPDES Permit for Federal Hatcheries**

- Received feedback from Task Force members
- Requesting feedback, especially on technical aspects

- Some entities may not be able to be listed on the letter.
- Some entities may submit letters separately.
- Comments to Ruckelshaus Center/Jerry White by Monday March 7<sup>th</sup> at noon.

**ACTION ITEM:** Jerry White will take Task Force feedback and put comments in letter form and send to the Ruckelshaus Center for posting on Wednesday March 9<sup>th</sup>. (COMPLETE, Update: comments received from Spokane County on March 8<sup>th</sup> not incorporated into letter, posted for Task Force review.)

**EAP Update:** Trout Lodge fish samples taken last year were lost due to a power outage, but other fish have been added to the study.

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The next meeting of the Task Force is March 16, 2016 from 9:00 a.m. to 12:30 p.m. at the Spokane County Water Resource Center.

The next meeting of the Technical Track Work Group is April, 6<sup>th</sup> 2016 from 10:00 a.m. to 12:00 p.m. at the Department of Ecology