AVISTA
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May 16, 2016

Mr. David Dilks, LimnoTech
501 Avis Drive
Ann Arbor, MI 48108

RE: Avista's Comments on the Draft Magnitude of Source Areas and Pathways of PCBs in the Spokane River Watershed Memorandum

Dear Mr. Dilks:

Avista appreciates the opportunity to provide comments on the Draft Magnitude of Source Areas and Pathways of PCBs in the Spokane River Watershed Memorandum (Memorandum), dated May 11, 2016. We appreciate the level of effort that is evident in this document and offer the following comments.

We agree with the use of the term "source area" and in clearly distinguishing between areas where PCBs may reside and potential delivery mechanisms of PCBs. We also support the inclusion of uncertainty factors with respect to both the mass estimates of source areas and loading rate estimates of delivery mechanisms. It may be helpful to note how uncertainty factors were estimated. In addition, in Figure 1, which includes two bar graphs of mass estimates from source areas, is it possible to illustrate the uncertainty range?

In the discussion of industrial equipment, the memorandum correctly notes that Avista will have completed replacing all transformers that held detectable PCBs in the Spokane River watershed this year. Since these are officially "non PCB" containing transformers, we suggest using the midpoint value of .5 ppm rather than the detection level of 1 ppm for the estimate applying to Avista's transformers, consistent with other estimates. With respect to the stocking of fish (in the loading discussion), inclusion of the estimated loading rate ignores the fact that these fish are stocked precisely to encourage their catch and removal. Similarly to the potential loading from hatcheries, we suggest that estimates on this potential loading wait until Ecology's study is completed.

Please feel free to contact me at (509) 495-4643 if you have any questions or wish to discuss our comments.

Sincerely,

Meghan Lunney
Aquatic Resource Specialist