

Dave and Kat-

I shared my comments with some folks and they had a couple of questions. I wanted to clarify a couple of points from below.

Item 2.c should refer to EPA testing and enforcement of [TSCA](#) PCB requirements, and Item 2.a was a study performed by [Ecology](#) on fish provided by Avista from a different project. Avista was not connected to the PCB study.

-John

From: Dave Dilks [mailto:ddilks@limno.com]
Sent: Monday, March 14, 2016 2:27 PM
To: John Beacham <jbeacham@postfallsidaho.org>
Cc: Kat Ridolfi <kridolfi@limno.com>
Subject: RE: Comments on PCB BMPs

John

Good comments. Kat or I will likely be in touch with you to discuss some details as we begin implementing them. Your first comment is already on the agenda for discussion at Wednesday's meeting. Thanks.

Dave

From: John Beacham [mailto:jbeacham@postfallsidaho.org]
Sent: Monday, March 14, 2016 4:13 PM
To: Dave Dilks <ddilks@limno.com>
Subject: Comments on PCB BMPs

Hi Dave-

Thank you for the chance to provide input on the draft PCB BMPs memo. This comprehensive plan is no small task and you are doing a good job of soliciting buy-in and input from all of us stakeholders. This document is going to be important to the ongoing work for PCBs and having it be as good as possible is a big deal. With that in mind, here are my suggestions:

- 1) The term BMP should probably be replaced with "potential source reduction effort" or "actions targeting source reduction". My rationale is that some sources/pathways will not have a readily identifiable BMP but may need further specific study or analysis. Prescribing a study is not a BMP but it is a next tangible action toward a source reduction. Along that line, the more these actions are specific and actionable, the more easily they will be analyzed and implemented in future steps.
- 2) A total of 23 BMPs seems to be very few to choose from, considering this is supposed to be the 'universe' of available options. I suggest analyzing more from the toolboxes of other PCB cleanup efforts as well as the following specific efforts:
 - a. Fish Harvesting ([Ecology Carp Study on Fish from Avista](#))

- i. This may sound insignificant but a few hundred fish would seemingly offset the annual PCB load of Post Falls
 - b. Sediment Capping or Removal
 - c. Federal testing for and enforcement of TSCA PCB requirements
 - d. Stormwater catchbasin “socks” (inserts designed to capture metals/oils)
- 3) Bioretention devices are also used prior to drywells, not just MS4s.
- 4) A PCB Minimization Plan is not an action which can be analyzed for effectiveness as the contents of that plan are unknown. This item should be removed from the list. I would anticipate that a PCB minimization plan would include a number of specific BMPs from this list. Including possible candidate actions for this plan in the memo would be beneficial to consider for future analysis of effectiveness. Examples from our permit include replacing old (pre 1980) equipment within the treatment facility and submitting an annual article on the issue to the local media.
- 5) I suspect that no entities Biosolids Management Plan currently allows for contaminated biosolids to re-enter the waste stream or receiving water bodies. If this item is retained in the inventory, it should be rephrased for clarity.
- 6) Under Site Remediation it should be noted that other pathways beyond storm drains can connect contaminated sites to the river. Examples include groundwater flow and direct runoff. Further, it should be noted that contaminated areas may exist in the river itself in the form of sediments or improper historic disposal of equipment.
- 7) Site remediation should include at least one pathway toward identification of unknown contamination to groundwater. This may involve prescribing a source identification study or other activity which does not initially eliminate the source but allows for steps toward that goal.

Again, thanks for the chance to comment. Please let me know if you need further clarification on any of this.

John Beacham

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