Dave:

I have the following initial comments on the "DRAFT Cost/Effectiveness of PCB Control Actions for the Spokane River Memo:

Table 1:

- I suggest that the "Site Remediation" category include a follow-up evaluation of PCB-contaminated sites where cleanup has been completed to ensure that the remedy is working as intended and possibly to revisit cleanup levels.

Table 2:

- Please repeat the table's header row at the top of each page.
- Regarding electrical equipment (#14, 15), I suggest you consult with Avista, if you have not already done so. They have done a lot of work to remove PCB-containing transformers, including those with PCB concentrations well below 50 ppm (see the EPA's July 14, 2015 response to the District Court at Page 7). They may be able to help you estimate costs for potential efforts to remove PCB-containing electrical equipment owned by others. http://srrttf.org/wp-content/uploads/2015/07/Spokane-TMDLNotice_of_Filing_EPA-Response_to_Remand_filed_7.14.15.pdf
- Regarding stormwater control actions, and particularly storm drain cleanout (#22), I suggest you consult with the City of Tacoma. They did a lot of this type of work to prevent recontamination of the Thea Foss Waterway. They eventually found a source of PCBs to the stormwater system (soil that had been contaminated by PCB-containing crack sealant used in a 1975 road construction project). https://www.cityoftacoma.org/government/city_departments/environmentalservices/surface_water/restoration_and_monitoring/thea_foss_waterway_cleanup/pcb_investigation

Figure 1:

- PCBs from fixed building sources (which I assume is referring to building materials such as paint and caulk) may not pass through soil before reaching the stormwater conveyance, particularly in dense urban areas.

Figure 6:

- PCBs from industrial equipment may also reach the river via the sanitary sewer system. Utilities' pretreatment programs or sewer use ordinances could address this pathway.
- PCBs from industrial equipment may not pass through soil before reaching the stormwater conveyance, particularly in dense urban areas.

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- I suggest researching the City of Tacoma's work to address PCBs in strormwater and including it in the "Lessons from Other Sites."

Thanks,

Brian Nickel, E.I.T.