**Comments from Ken Windram**  
  
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Hayden Area Regional Sewer Board  
  
Volatilization of PCBs from Wastewater Treatment Sludge  
Shanahan et al (2015) estimated that volatilization of wastewater treatment sludge was the second largest source of PCB release in the Chicago area. No site-specific data exists on the amount of PCBs volatilized from sludge in Spokane, although an estimate can be obtained from the previously calculated amount upper bound estimate of PCB sludge generation of 2000 mg/day (0.73 kg/year), combined with the determination of Shanahan et al (2015) that 2.5% of the PCB content of sludge is lost to volatilization, to estimate a volatilization load of 50 mg/day (0.018 kg/year).  
  
1. It is unlikely that any potential PCB Volatilization from drying beds into the atmosphere near Chicago reach the Spokane Valley.  
2. Chicago wastewater collection system has significantly more potential for higher PCB levels than the Spokane wastewater system due to significantly more industrial activity in Chicago.  
3. There are no wastewater treatment facilities using drying beds for sludge near Spokane. Biosolids are either composted or applied as soil amendment being incorporated into the soil.  
4. I have forwarded the Chicago study on the DR. Sally Brown with the University of Washington. Sally is a State of Washington and nationally recognized expert in biosolids.   
She has issues with the Chicago report. I ask that you contact her and discuss the volatilization of PCB from biosolids. Sally L. Brown <slb@u.washington.edu>  
  
PCB Blank Correction: PCB Method 1668, as you are aware, may make the needle move at the few PCB pico gram level. However, we have seen, as I am sure you have seen,  
blank results are sometimes several times the actual sample. The Idaho Dischargers have selected 10x Blank correction based on direction from IDEQ and EPA has not objected.  
We feel that all the data you have be blank corrected to the level of 10x the blank.