

Comments on: Cost/Effectiveness of PCB Control Actions for the Spokane River (*dated July 6, 2016*)

From: Spokane County Environmental Services

Date: July 18, 2016

Comments:

- **Page 7, several text corrections:**

o **Wastewater Treatment section**

- Change to *Liberty Lake Sewer and Water District*

o **Stormwater sections**

- Add *Spokane County* and *City of Spokane Valley* as local governments with NPDES Phase II stormwater permits
- Change *City of Spokane Falls Valley*

- **Page 9 and 10 “Future Steps” section**

See suggested edits to the “Future Steps” section:

Future Steps

It is worthwhile, when evaluating these Control Actions, to keep overall objectives in mind. ~~A primary objective of the~~ The goal of the Task Force is to develop a comprehensive plan to bring the Spokane River into compliance with applicable water quality standards for PCBs. demonstrate measurable progress in meeting the goals and objectives of the SRRTTF measurable progress towards reducing loads of PCBs to the Spokane River and towards achieving the applicable water quality criteria for PCBs.

After Control Actions have been selected by the Task Force, additional steps will be needed to ensure that ~~this~~ progress is being made. The details of implementing the Control Actions will be determined later in the Comprehensive Plan, but ~~These steps may~~ include:

1. ~~Numerical m~~Milestones for control action efforts ~~at the sub-category level need to will~~ be developed ~~as by the~~ Task Force. These should be interim, ~~numerical goals milestones~~ that are developed as we understand the ability for the Control Actions to deliver measurable progress. Such interim ~~goals milestones~~ should be assessed at scheduled intervals that make sense in order to adjust to our growing understanding of the issues. These interim ~~goals milestones~~ should be adopted into the Comprehensive Plan and used by Ecology with support from DEQ and EPA to determine whether the SRRTTF is making measurable progress ~~(with regards to “outputs”) in towards~~ bringing the Spokane River into compliance with water quality standards for PCBs.
2. Timelines for implementation of Control Actions will be set at the Control Action level within the Comprehensive Plan. A schedule for implementation (or a rolling timeline if the process requires years) should be developed for each control action
3. Each control action or suites/combinations of control actions will have a schedule and program for effectiveness monitoring. ~~If control actions are a function of regulatory programs such as the NPDES program, then these schedules should be included inside of those permits and be consistent with and coincide with the schedule inside the Comprehensive Plan.~~ This effectiveness monitoring should guide the management and provide room to adapt strategies,

phase out actions that are not working, and phase in new control actions that are developed. Additionally, this effectiveness monitoring should help WDOE in their efforts to make Measurable Progress determinations at five year intervals.

- **Appendix A, under Implementing Entity**

- What entities are “identified and willing” to *accelerate sewer construction*?
 - Spokane County has completed its multi-decade Septic Tank Elimination Program and has very few additional areas planned for sewer installation. It may not be appropriate to represent the implementing entities as “identified and willing.” (See comment below on Appendix B Fact Sheet: *Accelerated Sewer Construction*.)

- **Appendix A should be revised to accurately represent the *Removal Efficiency* described in Appendix B.**

In the *Removal Efficiency* column in Appendix A, 7 of 29 control actions are marked in the *unknown* category. But review of the 29 fact sheets indicates that 13 of the 29 are unknown. As written, Appendix A under-represents the uncertainty of the control action effectiveness. Appendix A and Appendix B should be coordinated for consistency.

- **Appendix B: *Accelerated Sewer Construction* (fact sheet page 17)**

- The PCB removal efficiency of a septic system (tank, drainfield, unsaturated zone, saturated (aquifer) zone) is unknown. Based upon the 2014 and 2015 synoptic survey and regional groundwater sampling in 2015-2016, dispersed groundwater PCB loading to the river is low and septic system removal efficiency may be comparable, or better than centralized wastewater treatment systems. While septic tank elimination has multiple benefits (e.g. reduced nitrogen loading to groundwater) accelerated sewer construction may not result in the reduction of PCBs to the Spokane River.
- Please modify the *Existing Effort* section of the fact sheet to indicate that septic tank elimination in the UGA is mandatory in areas that have sewer available. There are areas of the UGA that do not have centralized sewer collection and there is no requirement to eliminate septic tanks in those areas. As stated above, Spokane County has completed its Septic Tank Elimination Program and is only installing sewer on a limited basis. There is no planned effort to eliminate every septic system within the UGA. Septic systems will likely remain within the UGA for a variety of reasons, such as:
 - Installation of sewer in low density areas is not cost effective
 - Certain land uses are exempt by state law from the requirement to connect to sewer, even when available (e.g. manufactured home parks)

- **Appendix B: *Compliance with PCB Regulations* (fact sheet page 21)**

- Is this fact sheet based upon a study that indicates that the region is not in compliance with PCB product regulations?

- The fact sheet states:
 - *This control action consists requiring stricter accountability for compliance with existing rules. Potential activities include enforcement of existing TSCA rules to ensure imported and manufactured products are complying with allowable PCB levels.*
- While PCB product regulation is challenging, it is not clear that “*stricter accountability*” would actually result in a change in PCB loading to the river if manufacturers are already in compliance.