

Comments on: Cost/Effectiveness of PCB Control Actions for the Spokane River (*dated June 22, 2016*)

From: Spokane County Environmental Services

Date: June 30, 2016

Comments:

- **Clarify that the magnitude of PCB delivery pathways is unknown in 61% of Control Actions being considered and 36% are either already being implemented or are estimated to be relatively small**

Page 1, last paragraph: The memo provided three guiding principles (in order of priority):

1. *Maintain existing Control Actions*
2. *Gain understanding of uncertain source areas and pathways*
3. *Assess if additional actions merit near-term consideration*

Appendix B provides 28 fact sheets to describe each candidate Control Action. Sixty-one percent (17 of 28) state that the magnitude of the delivery pathway is unknown. Further, ten additional Control Actions comprise 36% of the fact sheets: three are listed as being small (<0.1% of the load) and seven are already being implemented (including carp removal).

If following the above priorities in order is recommended, then the SRRTTF appears to be at step #1 or step #2 with essentially all Control Actions; hence assessing additional Control Actions at this time may be premature.

If the SRRTTF believes it has completed step #2, then step #3 should be followed and there should be an assessment of the need for additional Control Actions, not just selecting from a list of highly uncertain choices.

- **Control Actions should be ranked based upon their estimated reduction of a source pathway**

Page 3, first bullet, states

“Control Actions that affect larger pathways will be preferred over Control Actions that affect smaller pathways.”

As written, the memo does not provide a perspective on the qualitative significance of pathways. The given magnitude categories ranging from >1% down to <0.1% provide for a small band of differentiation that doesn't provide information useful for decision making. Based upon recent limited sampling, it was observed that sources such as WWTPs and groundwater under Kaiser Trentwood are the largest “individual” sources to the river. Following the above recommendation, these would be preferred over other

Control Actions. Other pathways, mostly contributing to the MS4/CSO load, are unknown and possibly their impact would be unquantifiable even if controlled. Hence, Control Actions should be ranked based upon their estimated reduction of a source pathway, with greater reductions ranked higher.

- **The significance of pathway is defined as a percentage of total load** (page 4, last paragraph). **Please provide the value of total load used in those calculations.**

The *Magnitude of Source Areas and Pathways of PCBs memo* (June 22, 2016) in table 2 provides a loading estimate to the Spokane River as a range of 144 to 4012 mg/day. How was this range applied to estimating the impact of Control Actions?

- **The majority of the remaining Control Actions have significant uncertainty**

Page 6, third paragraph, change the words “some Control Actions” to the words “majority of Control Actions”...

- **Appendix A should be revised to accurately represent the *Magnitude of Pathways* described in Appendix B.**

In the *Magnitude of Pathway* column in Appendix A, 23 of 29 (79%) Control Actions are marked in the highest two loading categories. But review of the 28 fact sheets indicates that 17 of the 28 are unknown. As written, Appendix A seems to over-represent the understanding of the Control Action impacts on loading magnitudes. Appendix A and Appendix B should be coordinated for consistency.

- **Appendix A lists a Control Action *Education on septic discharge* but there is no fact sheet in Appendix B for that Control Action.**