LimnoTech

Water Environment | Scientists Engineers

# Comments on Draft Final Comprehensive Plan Memoranda

SRRTTF

Dave Dilks

May 25, 2016

# Summary

- Two Memoranda Provided for Review
  - Task 1b: Magnitude of Source Areas and Pathways
  - Task 2a: Inventory of Control Actions
- Many comments received on Magnitude memo
  - Interim drafts provided 5/11 and 5/18
  - A few loose ends to wrap up
  - Biggest issue is treatment of uncertainty for Lake Coeur d'Alene and WWTP blank correction
- Fewer comments provided on Inventory memo

# Magnitude of Sources and Pathways

## Categories of Comments

- Consideration of uncertainty
  - Lake Coeur d'Alene concentration
  - Blank correction of WWTP samples
- Wording changes
- Add map of delivery pathways
- Typographical errors

# Magnitude of Sources and Pathways
## Consideration of Uncertainty

- Lake Coeur d'Alene concentration
  - Memo states: "analytical results utilized to estimate this concentration are below concentrations at which PCBs can be measured with confidence."
  - Comment: "It seems more accurate to acknowledge the initial statement that values cannot be measured with confidence and propose that additional studies be conducted."

# Magnitude of Sources and Pathways

## Consideration of Uncertainty

- WWTP Blank Correction
  - Comment: All permitted sources have collected data pursuant to their permit conditions under approved protocols. These sources should be presented using only this best available data corrected at 10 times. If synoptic data are presented, provide them at 10x blank correction.

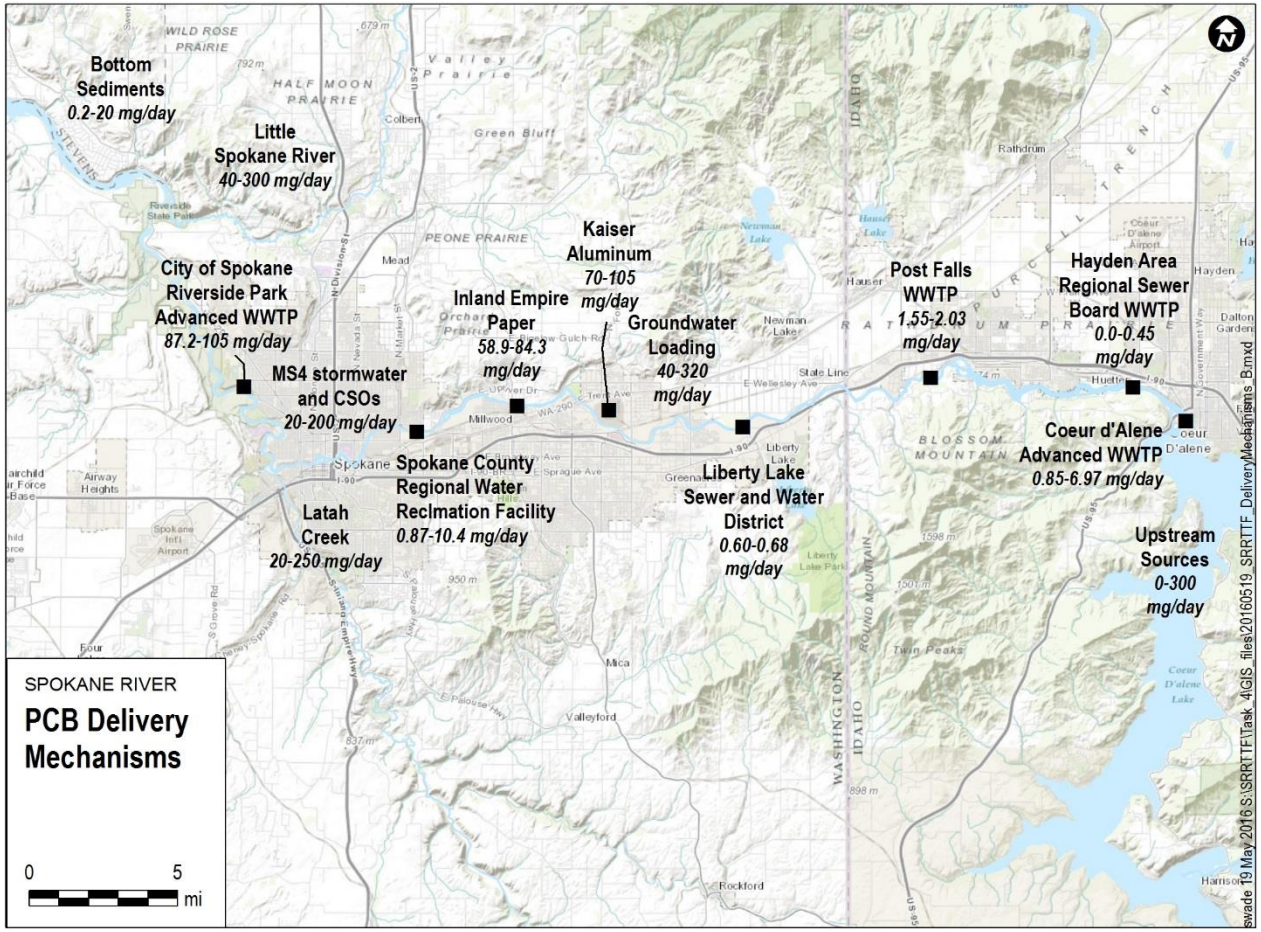
# Magnitude of Sources and Pathways

## Wording Changes

- Replace “3x blank censoring”, “10x censoring” with description of what censoring is
- Recognize that inadvertently produced PCBs can be exported via disposal to landfills outside of the watershed
- Recognize that most recent estimate of Spokane stormwater load is an improved estimate, not just an alternative calculation
- Include consideration of disposal of sludge from septic systems

# Magnitude of Sources and Pathways

## Add Map Summarizing Delivery Pathways



# Task 2a: Inventory of Control Actions

- Original comments not as extensive as on Magnitude memo
  - Clarification/addition of some control actions
  - Description of existing Toxics Management Plans for WWTPs
  - Recognition that MTCA takes precedence for site remediation
- No additional comments received on 5/18 draft

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# Cost/Effectiveness of Control Actions, Routine Monthly Monitoring Update

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# Cost/Effectiveness of Control Actions

- Good News
  - On schedule to deliver first draft June 1
  - More than 50 Control Actions identified
  - More than 30 of these Control Actions have load reduction and/or cost information available

# Cost/Effectiveness of Control Actions

- Complications
  - Existing studies primarily provide load reduction ~~and/~~ **or** cost
  - "Magnitudes" memo determined that we can't quantify most transport pathways
  - Many entities are already implementing Control Actions
  - Many of the Control Actions evaluated so far pertain specifically to stormwater
    - Largely already being addressed

# Cost/Effectiveness of Control Actions

- Reality
  - Process won't be as simple as a direct optimization
    - e.g. implement actions that reduce PCB delivery by less than $x per gram of load reduction
  - Other PCB control plans have faced similar issues
    - We can build off of what they've done
  - Adriane's hierarchy may serve as a guiding principle
    - Don't make it > Don't use it > Use less of it > Manage it properly > Dispose of it properly > Treat it

# Monthly Sampling Update

- March and April sampling completed
  - No PCB results received yet
    - Laboratory error with March samples, archive samples are being analyzed
- May sampling being conducted this week
- Decision to sample in June, or postpone until fall