

## **Spokane River Regional Toxics Task Force (SRRTTF) Meeting**

Facilitated by the William D. Ruckelshaus Center (Chris Page and Kara Whitman)

DRAFT Summary Notes | Wednesday, May 25, 2016 | 9:00 a.m. – 12:30 p.m.

Spokane County Water Resource Center | 1004 N. Freya Street | Spokane, WA

Meeting Documents posted: <http://srtrtf.org/?p=6373>

### **Attendees:**

#### *Voting Members and Alternatives (\*Denotes Voting Members)*

Tom Agnew\*, BiJay Adams –Liberty Lake Sewer and Water District

Galen Buterbaugh\* –Lake Spokane Association

Jeff Donovan\*, Adriane Pearson –City of Spokane

Don Keil\*, Kris Holm (phone) –City of Coeur d'Alene

Dave McBride\* –Department of Health

Heidi Montez\* –Lands Council

Dave Moss\*, Mike Hermanson –Spokane County

Bud Leber\*, Brent Downey –Kaiser Aluminum

Doug Krapas\* –Inland Empire Paper

Jerry White\* –Riverkeeper

Lisa Manning\* –Kootenai Environmental Alliance

#### *Advisors*

Kevin Booth –Avista

Adriane Borgias, Ted Hamlin, Jeremy Rys –WA Department of Ecology

Brian Nickel, Laurie Mann (phone) –Environmental Protection Agency (EPA)

Dan Redline –Idaho department of Environmental Quality (IDEQ)

#### *Public/Interested Parties*

John Beacham –City of Post Falls

Lisa Dally Wilson –Dally Environmental

Dave Dilks (phone) –LimnoTech

Rich Watson –Washington Department of Fish and Wildlife (WDFW)

Eric Williams –Gallatin Public Affairs

### **Introductions, Agenda Review, Acceptance of Prior Meeting Summary**

After a round of introductions, no changes were made to the agenda. The group reviewed the summary notes from April 27, 2016 Task Force meeting. Typos: Jim Bellatty in attendees. Also add “because the court felt it was premature, more procedural vs substantive.”

**DECISION:** The SRRTTF accepted the April 27, 2016 summary notes with the above minor edits.

**ACTION ITEM:** Ruckelshaus Center to post accepted 4/27/16 summary notes to Task Force website. (COMPLETE)

**New Stakeholder Member:** Postponing agenda item until the permit is finalized.

**TSCA Reform Bill:** U.S. House Bill 2576 passed both the House and Senate, though the two versions need reconciling. Doug Krapas reported that congressional leaders did not address the inadvertent production of PCBs in the current versions of the bill. There is still an opportunity to have the Task Force voice heard. Doug suggests that the Task Force send a letter outlining the issues and consequences of inaction. Doug volunteered to draft the letter, for the SRRTTF to consider sending on its letterhead to the Washington and Idaho members of the U.S. House and Senate.

Environmental Council of States (ECOS): would this group be interested in this issue, and worth approaching? Also, have we recently contacted representatives from the Duwamish River and San Francisco Bay PCB cleanup efforts? Doug will coordinate with them.

**ACTION ITEM:** Adriane Borgias, Doug Krapas, with some help from John Beacham, to contact Maia Bellon regarding ECOS engagement on this topic.

*NOTE:* EPA, may need name removed from letterhead for this letter.

**ACTION ITEM:** Doug K. draft letter by next week, invite comments. Final Draft by June 8<sup>th</sup>. (COMPLETE)

Additional Technical Track Work Group (TTWG) Meetings scheduled for: June 15<sup>th</sup> 8:30-10:30, July 20<sup>th</sup> 10-12.

**LimnoTech Presentation:** Dave Dilks presented on a pair of memos (presentation posted at <http://srrttf.org/?p=6373>)

### **Task 1b: Magnitude of Sources and Pathways memo**

Comments so far pertain mainly to the consideration of uncertainty (specifically regarding Coeur d'Alene samples and blank correction), minor wording changes, adding a map of delivery pathways, and typos.

#### **Q&A/Comments:**

- **C.** Encourage Idaho Department of Environmental Quality (IDEQ) to look at blank correction and uncertainty issues. A range can capture the uncertainty of whether Lake Coeur d'Alene is a source or not.
- **C.** We should use ranges, rather than midpoints (particularly for point sources). **C.** If the bottom of the range is stated as zero; there is not likely any water that has "zero." **C.** Could call it "near zero" (not absolute zero) or "less than detection."
- Dave Dilks: Similar studies have included midpoints, so there is some precedent, but it's easy to show ranges without a midpoint. **C.** Mike Hermanson explained that lab water traveling with these samples came back higher (when 3x blank-corrected) than Lake CDA.
- **C.** Table 4: needs some clarification. How are these numbers crunched? Dave can send the spreadsheet to the Task Force for review to check these numbers. **C.** pick one way to state the blank corrected numbers, but explain how different blank corrections impact the numbers.
- **Q.** For PCB-loading values in Table 4, on what is the range based? **A.** The load uses a flow x concentration specific to each of the concentration columns.
- **C.** Map: could include a narrative that "many unquantified sources not featured on the map are discussed in the text."
- **Q.** Conceptual: bottom sediments a source? **C.** They may be a sink, not necessarily a source; how to reflect this is in question (use a footnote to explain this complexity on sediments as a source).

**ACTION ITEM:** Dave Dilks to make edits to the memo "Magnitude of Source Areas and Pathways of PCBs in the Spokane River Watershed" for discussion at June 1<sup>st</sup>, TTWG Meeting and have a revised draft by the 8<sup>th</sup>, for a decision at the June 15<sup>th</sup> combined Task Force meeting/TTWG meeting. (COMPLETE)

### **Task 2a: Inventory of Control Actions memo**

The comments on this memo mostly regarded the addition and clarification of control actions, a description of existing Toxics Management Plans for Wastewater Treatment Plants, and recognition of the Model Toxics Substances Control Act precedence.

- **C.** Difficult to give a magnitude to the pathways due to fuzzy information between delivery and the source. Really important that 2b memo closes the "holes" as much as possible, to prioritize PCB control actions.

### **Cost/Effectiveness of PCB Control Actions Memo**

LimnoTech will deliver first draft on June 1<sup>st</sup>, 2016 with more than 50 control actions, 30 of which have load reduction and/or cost information available. Complications include:

- Existing studies have primarily provided only load reduction or cost, not both;
- Magnitudes memo concluded that most transport pathways cannot be quantified at this time;
- Many control actions evaluated pertain to stormwater which is largely already being addressed in the basin;
- Many entities are currently implementing control actions.

The process will not be a simple direct optimization. The hierarchy of control actions (Don't make it, don't use it, use less of it, manage it properly, dispose properly) that Adriane Borgias provided and the BMP matrix that Jerry White provided can help guide the Task Force through this process.

**ACTION ITEM:** Jerry White to provide Dave Dilks the BMP Matrix. (COMPLETE)

**Monthly Sampling Update:** No PCB results yet for March and April sampling. Laboratory error with March samples, archive samples are being analyzed (AXYS added an erroneous standard after it was extracted, so will make no additional charge). Post Falls is tagging on with May sampling.

- **Q.** Postpone sampling set for June to Fall? (June is not wet or high flow). Address at TTWG Meeting. Look at USGS sites for St Joe and Coeur d'Alene Rivers to see when peak flows occur and compare to the time sampling occurred. Dave will report on this at the June 1<sup>st</sup> TTWG Meeting.
- **Q.** What portion of snow melt did the sampling capture? March and April had higher than average flows (higher elevation snow, not local snow?). Sampling now would capture rainfall flow rather than snow melt.

**ACTION ITEM:** Dave Dilks to look at peak flows and compare to sampling. Dave will present this to the TTWG on June 1 for decision on doing June sampling (or postpone to fall). (COMPLETE, sampling to proceed in June.)

**Groundwater Sampling Update:** 4 groundwater sites and 3 springs have been sampled, nothing has been found at this time. Ted Hamlin (Ecology) explained that the aquifer water level is dropping now, so it appears the snowpack recharge has passed.

### **Water Quality Goals: How will Comp Plan Set Goals toward Meeting Water Quality Standards?**

Jerry White explained that Riverkeeper feels that plan should have benchmarks tied to schedules. They can be broken out by source areas and defined in loading or concentration. Goals and benchmarks could be tied to: EPA response to Judge Rothstein (if accepted, has enforceable schedules and timelines) and the future determination of Measurable Progress (MP); comp plan could provide a framework for MP determination.

- **C.** This is going to be very complex. The Task Force has no regulatory authority.
- **C.** Dave Dilks: LimnoTech had thought to start this process after the workshop, but welcomes input any time.
- **C.** John Beacham recommends that as LimnoTech is going through research, they should include implementation information, with recommendations on how to gather information to monitor (i.e. how long did it take to implement, what schedule and post monitoring has been done? etc.).

### **Data Management Work Group Update**

Adriane Borgias explained this group is working through the Delaware River Basin Commission (DRBC) Standards, tweaking them, and making recommendations. The group will hold at least two more meetings, then provide recommendations to the TTWG for review before bringing to the full Task Force.

**Administrative & Contracting Entity UPDATE:** Meeting schedule for June 2<sup>nd</sup>, 2016 to discuss contractors.

### **Report on PCB Presentation to EPA TMDL Program**

Laurie Mann recently attended the annual, EPA only, national meeting (2.5-day workshop) for the 303d Total Maximum Daily Load (TMDL) program (lots of East Coast attendees). Laurie gave a 25-minute presentation to explain the conflict between the Toxic Substances Control Act (TSCA) and the Clean Water Act (CWA), and the issue with inadvertent PCBs. She highlighted the high levels of PCBs in building materials in WA state along with the discrepancies between states with regards to 303d listing of PCB impairments: only three states have more 303d listings than WA. There is no reason that WA should have more impairments than other states. This is because of the listing policy based on fish tissue data, while most other states don't use fish for listing.

Laurie got positive feedback on the presentation; many had never heard of inadvertently-produced PCBs, nor the conflict between TSCA and CWA. Laurie and her colleagues are trying to spread the word about these issues as opportunities arise. There are still EPA websites that say PCBs are only a legacy problem (this needs fixing).

*Note: Michelle Mullin will be presenting at TSCA National meeting in August on Inadvertently produced PCBs and work being done in Washington. May be an EPA only meeting, Laurie will check and let the Task Force know if it is open to the public.*

### **Positive Matrix Factorization (PMF) for Spokane County and Potential Work by Dr. Rodenburg for SRRTTF**

Mike Hermanson explained (presentation at <http://srرتtf.org/?p=6373>) that PMF analysis can identify factors that help indicate sources. Factors, once identified, can be applied to individual samples to look for sources. Dr. Lisa Rodenburg prepared a draft scope of work for SRRTTF to look at homologs to examine factor profiles from Barker to Spokane, look for unaccounted for loads as they move downstream.

Mirabeau to Trent appears to be a legacy source gain, while Trent to Green shows an overall gain of penta, hexa, and octo homologs, while there appears to be an overall loss of total PCBs (gain and loss reach), homolog analysis shows this difference.

#### ***Next steps to consider?***

- Add homolog mass balance to Limnotech scope for 2015 synoptic sampling report?
- SRRTTF consider additional low-flow sampling in the Trent-to-Green reach?

#### ***Dr. Rodenburg Proposal:***

- **Q.** Separate data prep and formatting to reduce cost?
- **Q.** Can LimnoTech do homolog analysis to target the PMF analysis?
- **C.** PMF can show information about source type, while homolog analysis is about location. The proposal is the full proposal and cost, but the Task Force can negotiate what work to request and the cost.
- **C.** Dave Dilks said the Task Force would get a lot of value out of Dr. Rodenburg's proposed work but not in time to inform the Comp Plan. It could be part of the "Future Studies" portion of the Plan.
- **Q.** Is there a doable analysis in the near term that could help inform the Comp Plan? **A.** Dave Dilks could potentially vet Mike Hermanson's homolog analysis on the Task Force data and bring to a TTWG meeting to look at where to go. This could go in the 2015 report, if within existing LimnoTech scope.

**ACTION ITEM:** Dave Dilks to work connect Mike Hermanson on the homolog analysis and bring recommendations to the June 1<sup>st</sup> TTWG meeting. (COMPLETE)

**ACTION ITEM:** Ruckelshaus Center to request Lisa Rodenburg provide a menu of options, assumptions of data format/data prep to save on costs, etc. (COMPLETE)

**Website:** Kara Whitman walked the Task Force through [srرتtf.org](http://srرتtf.org). The group requested more clarity as to where important documents are posted, and asked if a Table of Contents can get incorporated.

### **Events & Outreach, Funding**

#### ***Funding:***

- Reconvene Funding Work Group and revisit Funding Strategy.
- Define needs for the next funding allocation; update fact sheet for legislative session.
- Funding Group: Tom Agnew, Mike Petersen, Adriane Borgias others? Adriane to look at the work group members and set up meeting.

#### ***Outreach Fact Sheet:***

The Task Force discussed the “Fact Sheet” put together by Sandy Phillips and the Outreach Work Group.

- **C. Recommendation:** reduce number bullets in “work currently in progress” and add a bullet about conservation reducing load of PCBs.
- Consider two versions? One for public/different stakeholders.
- Could have Public Information Officer from Ecology look at it.

**DECISION:** The Task Force agreed that the Fact Sheet should be a living document, updated and revised as appropriate as the work progresses. The SRRTTF approved the document with that caveat and asked the Outreach Work Group to continue, to pull together more specific outreach materials.

#### **Updates and Announcements:**

- TTWG Meetings: June 1<sup>st</sup>, June 15<sup>th</sup>, July 6<sup>th</sup>, July 20<sup>th</sup>.
- June 15<sup>th</sup> TTWG will also serve as a full Task Force meeting.
- What is the timeline for the final Product Testing project report? ACTION ITEM: Adriane to find out status.

#### **No Public Comment**

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The next SRRTTF Meeting is June 22, 2016 from 9am -12:30 pm at the Liberty Lake Sewer and Water District  
The next meeting of the Technical Track Work Group is July 6, 2016 from 10am-12pm at the Department of Ecology