

Combined Spokane River Regional Toxics Task Force/Technical Track Work Group Meeting
Facilitated by the William D. Ruckelshaus Center (Chris Page and Kara Whitman)
WA Department of Ecology | 4601 N. Monroe | Spokane WA
Wednesday June 15, 2016

Attendees: * indicates a voting member

BiJay Adams—Liberty Lake Sewer & Water District
Tom Agnew* (phone)—Liberty Lake Sewer and John
Beacham (phone)—City of Post Falls
Kevin Booth—Avista
Adriane Borgias—Department of Ecology
Galen Buterbaugh* (phone)—Lake Spokane Ass'n
Lisa Dally-Wilson—Dally Environmental
Dave Dilks (phone)—LimnoTech
Jeff Donovan—City of Spokane
Mike Coster—City of Spokane
Ted Hamlin—Department of Ecology
Mike Hermanson—Spokane County
Kris Holm (phone)—City of Coeur d'Alene

Paul Klatt (phone)—J.U.B. Engineering
Doug Krapas*—Inland Empire Paper
Mike LaScuola*—Spokane Regional Health District
Bud Leber—Kaiser Aluminum
Lisa Manning* (phone)—Kootenai Environmental
Alliance
Dave McBride* (phone)—Department of Health
Dave Moss*—Spokane County
Mike Petersen*—Lands Council
Sandy Phillips—Spokane Regional Health District
Jeremy Ryf — WA Department of Ecology
Elizabeth Schoedel*—City of Spokane
Jerry White*—Riverkeeper

Introductions and Agenda Review

After a round of introductions, no changes were made to the agenda (quorum reached).

TSCA Reform Comment Letter

Doug Krapas advised the group that sending the letter is not needed at this time. Doug will work with the governor's office on other ways to raise awareness at the state and federal level (there may be an opportunity to send the letter in the future). Mike Petersen will mention this when he meets with legislature on this issue. Perhaps EPA can address this in the future. The SRRTTF TSCA "SWAT Team" will work on a strategy for moving forward. The letter, if used, will be revised, and re-voted on. **Note:** *Remove EPA from letterhead if a version of this letter it is used in the future.*

DECISION: The Task Force voting members agreed that not to send the letter at this time since the bill already passed. The letter will be saved for later, to be revised for State regulatory level conversation.

Dave Dilks Presentation: Comprehensive Plan Memos and Monthly Monitoring

Full presentation at <http://srrttf.org/?p=6463>.

All memo drafts (and comments) at http://srrttf.org/?page_id=6228.

"Magnitude of PCB Sources and Pathways" Memo

Dave reviewed changes to the memo, including changes to tables and graphics.

Q&A/Comments

- **C.** Suggestion: For Wastewater Treatment Plant graph, use an interrupted scale and truncate it at 10,000 to show that part of the whisker is off the scale for one data point. Allow for a larger scale for the rest of the dischargers.
- **Q.** One sample for routine monitoring for Coeur d'Alene (CDA)? **A.** LimnoTech only received one data point from CDA. Dave Dilks and Kris Holm will circle back and check on this.

- **C.** Clarify the Y axis to add a legend with explanation to see body of text for explanation of box-and-whisker plots.
- **Q.** Did you use all outliers? **A.** Did not screen anything out.
- **Q.** Source estimations changes? Converted to a range. **C.** This is still unclear to some folks. Need some minor clarifications about how single numbers changed to ranges.
- **C.** Figure 2 (Map with ranges of loading as min and max) doesn't seem to be particularly useful when range is 4 - 2600. Put median in parentheses? Add box to map (so readers see text for explanation).

ACTION ITEM: Mike Hermanson to send proposed edits to Dave Dilks. (COMPLETE)

DECISION: The Task Force provisionally approved the "Magnitude of Source Areas and Pathways" memo with the noted edits to graphics and minor clarifications.

Task 2a: "Inventory of Control Actions" Memo

Dave Dilks suggests deferring a decision on this memo until the July Task Force meeting so he can incorporate new substantive comments received.

Task 2b: "PCB Control Actions Cost/Effectiveness" memo

Dave gave an overview of comments received: some on memo organization and format, and requests for more detail in places (e.g. in "costs" table, on relative magnitude of intermediate pathways, and on the ability of control actions to affect delivery. Task Force members feel the memo could be arranged in a more coherent manner. Dave said he would re-organize the memo, adding for each Control Action:

- **"Fact Sheet" Format:** A "fact sheet" to include: how the Action would be implemented, expected reduction efficiency, significance of pathway (many qualitative, and some quantitative), cost, and description of key advantages and disadvantages of the control action.
- **Summary Format:** LimnoTech also plans to summarize different PCB Control Actions in a table, scoring each on aspects such as removal efficiency, magnitude of pathway, cost, implementing entity, hierarchy, ancillary benefit, and redundancy (cost is least predictable). This format will be a template for moving forward. The group recommended adding another color for "unknown" to differentiate from number values (low, medium, high, unknown). Make sure scales are all meaningful, this will be important for getting group consensus on scores for control actions.

Schedule: revised draft by June 22nd, official "final draft" for review by July 6th. Dave hopes that prior to workshop, the Task Force can reach consensus on the contents of the fact sheets.

Q&A/Comments:

- **Q.** Will it be clear what each Control Actions targets (sources and pathways)? The more internal coordination between the memos and efforts, the better.
- **C.** Down the road the SRRTTF will need to discuss interim targets.
- **C.** Use precaution as the Comp Plan moves forward, given the uncertainty and use of qualitative information (rather than robust quantitative information); it is difficult to know the cost-effectiveness of BMPs. **A.** "Future Studies" component of the Plan will address this issue.
- **C.** This would be a "menu" of options; entities moving forward with control actions would do extensive research before implementing a Control Action.
- **C.** Comp Plan would cover control actions outside other BMPs implemented by individual entities.
- **C.** Start identifying who appropriate entities are for different Control Actions. Identify those already in permits (e.g. BMPs). Explicitly state "these actions are already addressed in the permit."

- **C.** Brian Nickel explained that EPA mentioned that permit writers should look to the Task Force Comp Plan. Permits will be subject to public comment and limitations of the NPDES program. It is good to be mindful of the potential connection, but Comp Plan does not dictate permit content.

ACTION ITEM: Ruckelshaus Center to add an update on the court case to the June 22, 2016 Task Force meeting Agenda. (COMPLETE)

Monthly Sampling:

Dave Dilks explained that the City is rehabilitating the Upriver Dam Spillway (work starts July 6th). Sampling starts June 22nd. Elizabeth Schoedel noted the Dam work schedule has been extended for six months; the Task Force must consider ramifications for fall monitoring. The March PCB results arrived and LimnoTech is blank correcting the data should be available by the June 22nd Task Force meeting.

- **Q.** Will you post the raw data? **A.** The data will be made available on SRRTTF website after initial QA by LimnoTech.

July 27, 2016 Task Force Meeting/Workshop

The Ruckelshaus Center is working with Limnotech to format the workshop. There will be more information on this at the June 22nd Task Force meeting. Potential workshop components include:

- Fact Sheets
- Selection Criteria
- Tools: small group discussions (options: pathways, criteria, stakeholder groups)
 - Consensus, challenging if split into small groups. Can work this out in a few different ways so that everyone can contribute to discussion on each control action.
 - Lunch-bring food in?
- Focus consensus-seeking on how the Task Force can implement something
- Rather than making it a fact-finding workshop, rely on Control Action fact sheets from Dave Dilks.
- Goal: SRRTTF agree on Task 2a, 2b memos as “fact base” so group can focus on moving forward.

ACTION ITEM: Ruckelshaus Center to work on a preliminary draft Workshop agenda for the June 22, 2016 Task Force Meeting.

Future Studies in the Comprehensive Plan

Dave Dilks views the “future studies” portion of the Comp Plan as a workshop outcome. This may include Control Actions the Task Force needs more data to further vet.

C. Water quality standards and fish tissue concentrations: if the River meets water quality standard, need to make link to fish tissue.

Future Studies Q&A/Comments:

- **C.** Further studies are an important outcome of the Comp Plan, but so are identifying Control Actions to implement.
- **C.** The group discussed PCB concentrations in fish tissue vs. water column, and how water quality standards get calculated. In Washington, this calculation is based on incomplete information (bioconcentration vs. bioaccumulation).
- **C.** Explore sediment archives and how they related to accumulation/biomagnifications in fish; we need to understand the system better (fingerprinting etc.).
- **C.** Rulemaking right now. Idaho is using bioaccumulation and WA is using bioconcentration.
- **C.** The SRRTTF is working toward compliance with the current water quality standard.
- **C.** This system is easier to study than others such as estuary systems (more of a closed system).

- C. Potential up-gradient source of Kaiser linked to groundwater loading of PCBs to the river.
- C. Input may be coming from groundwater seepage from Model Toxics Control Act (MTCA) cleanup sites. The Task Force cannot supersede the MTCA agreements (e.g. Kaiser site). SRRTTF should not waste time on BMPs for site cleanup already under the MTCA. MTCA has clearly established criteria that protect the water quality, and is regulated by Ecology.

ACTION ITEM: Peer review on the Kaiser data on an upcoming agenda.

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

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