

Comp Plan _preliminary comment

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To: Dave Dilks [ddilks@limno.com]

Cc: Whitman, Kara Michelle; Page, C

Hi Dave,

I hope to have a chance to provide a comprehensive set of review comments on the comp plan in a week or so, but in the interim, I have one general comment that applies to both the introductory paragraph in the Executive Summary and in Section 2.5. The way both of these sections are written, it is not crystal clear that the PCB 303(d) listing on the Spokane River is due solely to the concentration of PCBs measured in fish (that are then subject to an equation that estimates the concentration of PCBs in the water column which is then compared to the standard) rather than a direct measurement of PCB in the water column. I may be splitting hairs here, but I think it is an important point. Furthermore, it would be worthwhile to explain what fish data were used; both for the initial listing and for subsequent listings including the most recent EPA approved 303(d) listing on the Spokane River. If you research the data sources for those fish listings (which are on-line and worth a look), you'll find the dates of the reports used. The date of the reports used to verify the listings, the dates of the sampling they describe, and the uncertainty of age of some of the fish species is of interest and possibly worth a mention in the Comp Plan.

Thank you

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