

TTWG Report & Technical Topics

SRRTTF Meeting
Dave Dilks
September 28, 2016

Outline

- Monthly sampling update
- Comprehensive Plan
 - Summary
 - Points of discussion
 - Timeline and process for comments and revisions



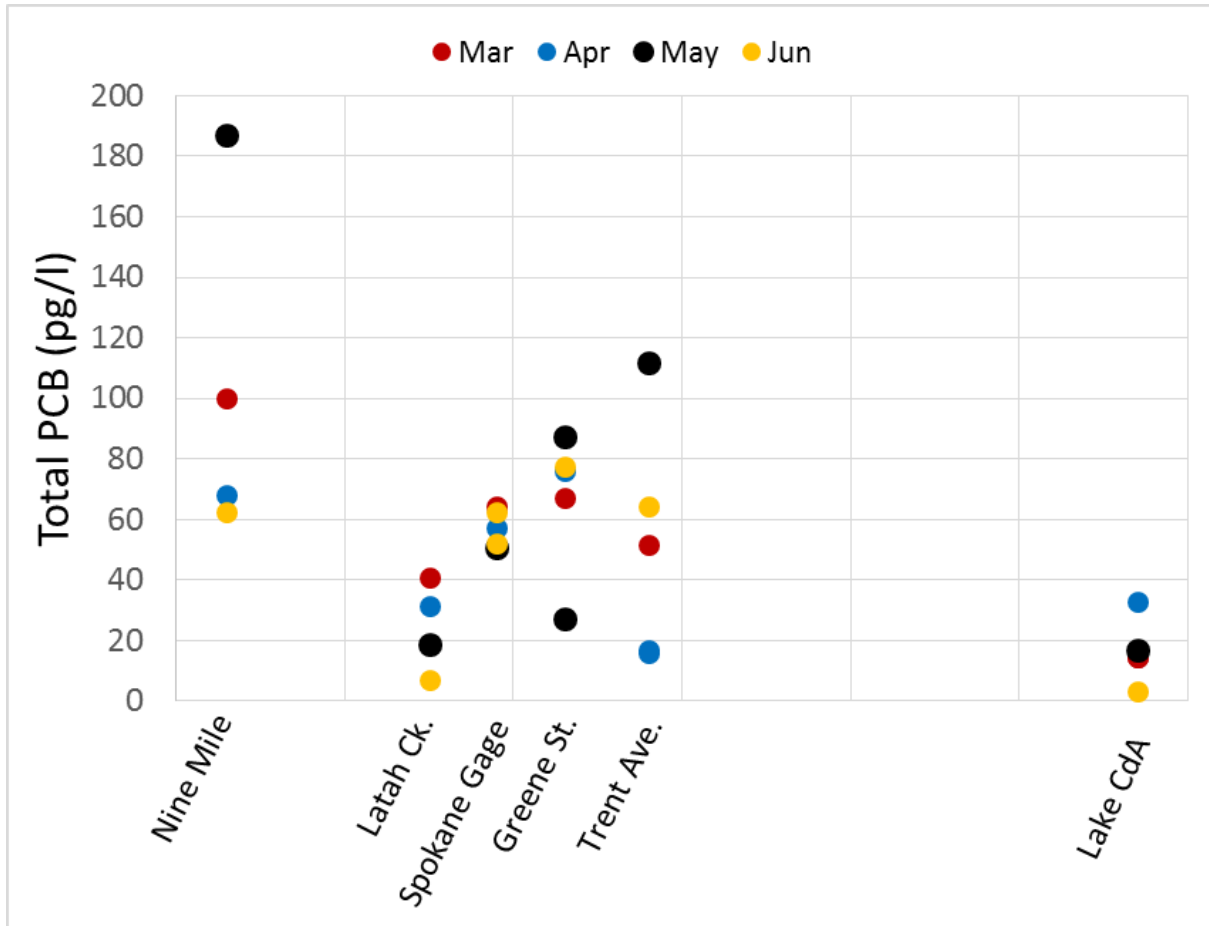
Findings from 2016 Monthly Monitoring

- Concentrations are low at Coeur d'Alene
- Concentrations increase downstream
 - Increase less than they did during synoptic surveys
 - Higher river flows give greater dilution of existing sources
- Latah Ck. concentrations are uniformly low
 - Even in response to one wet weather event

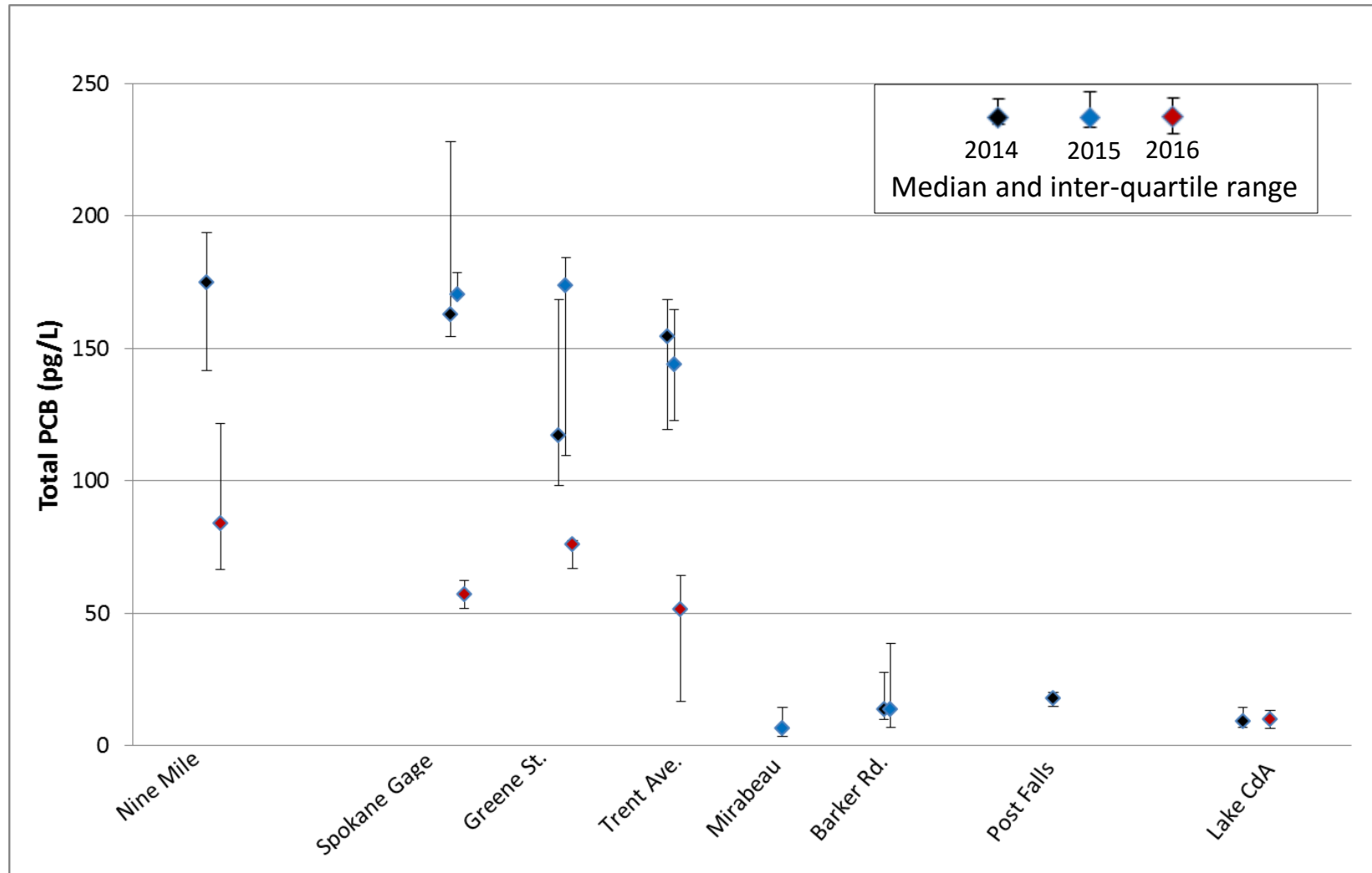


Observed 2016 Concentrations

← Direction of Flow



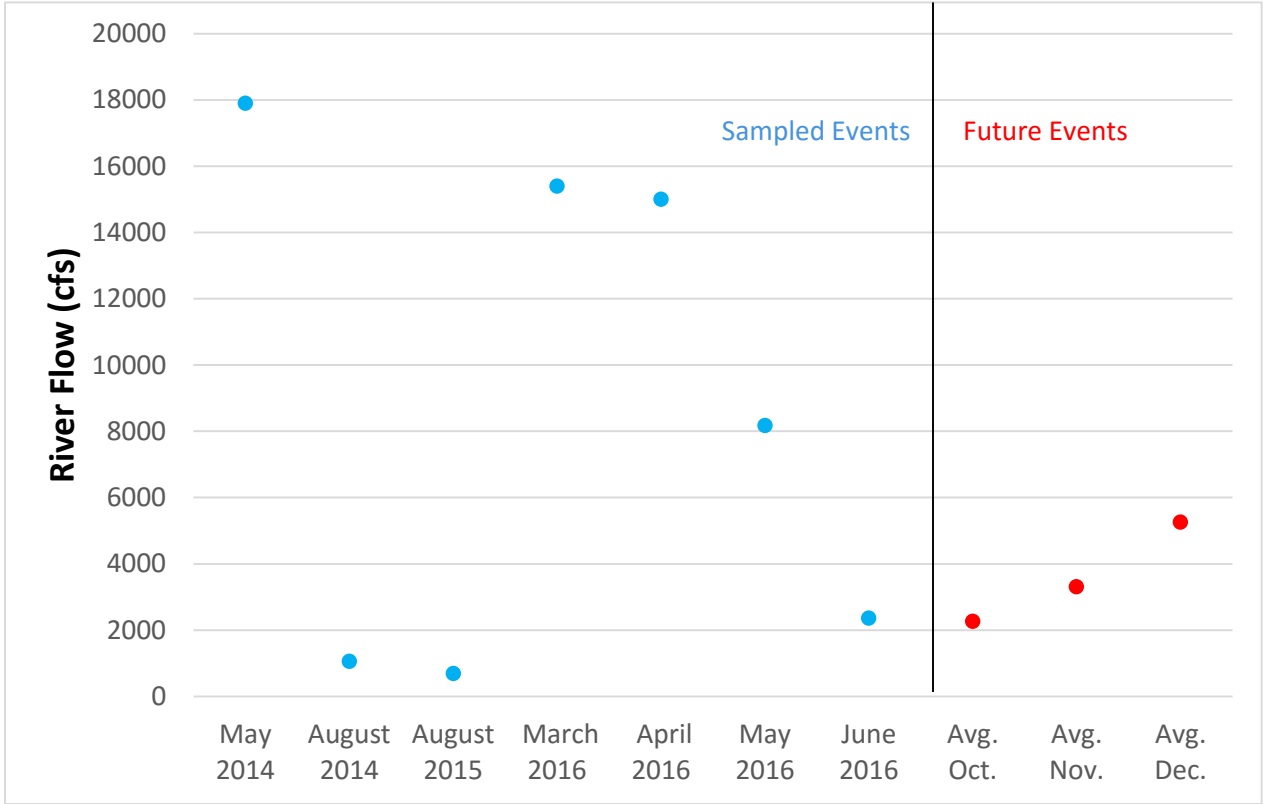
Comparison of 2016 to Synoptic Surveys



Which Months for Remaining Sampling?

- Two months of sampling left in scope
- Trade-off between expected flow and likelihood of rainfall
 - Highest likelihood of unique flow range:
 - November and December
 - Best chance of opportunistic rain event:
 - October and December
- TTWG Consensus
 - Late October/early November, plus December





Comprehensive Plan

- First Draft issued September 15
- Summary of Plan presented today
 - Highlight key comments received to date
- Discussion of review schedule
 - Open sharing of review comments



Comprehensive Plan Outline

- Introduction
- Watershed Characterization
 - Study area, available data, impairment status
- PCB Source Assessment
 - Sources, transport pathways and delivery mechanisms
- PCB Control Actions
 - Inventory, evaluation and selection
- Implementation Plan
- Future Studies



Recap of Workshop Recommendations

- 27 categories of Control Actions evaluated
- Each Control Action assigned to a category
 - A. Existing Action: Maintain existing efforts
 - B. Existing Action: Maintain and enhance
 - C. New Action: Commit to implement in Plan
 - D. New Action: Worth consideration in future
 - E. Do Not Pursue Further



Category A Control Actions

Maintain Current Activities

Control Action	Existing Activities
Wastewater Treatment	<ul style="list-style-type: none">• Spelled out in NPDES permits
Remediate Known Contaminated Sites	<ul style="list-style-type: none">• Assessment of remediated sites<ul style="list-style-type: none">– Upriver Dam and Donkey Island– City Parcel, General Electric sites• Ongoing Kaiser remediation
Stormwater Controls	<ul style="list-style-type: none">• City's Integrated Clean Water Plan• MS4 permits for other municipalities



Category A Control Actions (cont.)

Maintain Current Activities

Control Action	Existing Activities
Low Impact Development	<ul style="list-style-type: none">• City's ordinance
Street Sweeping	<ul style="list-style-type: none">• Currently being conducted in several communities
Purchasing Standards	<ul style="list-style-type: none">• Regulations in Washington, Spokane City and County

- Note: No new schedules or effectiveness monitoring proposed in Plan for Category A Control Actions



Category B Control Actions

Maintain and Enhance Current Activities

- Support Green Chemistry
- PCB Product Testing Information
- Waste Disposal Assistance
- Regulatory Rulemaking
- Compliance with PCB Regulations
- Emerging End of Pipe Stormwater Technologies



Support Green Chemistry

- New Activities
 - Provide guidance and feedback to Ecology
 - Reach out to other parties (EPA, and/or universities)

Milestone	Timeline	Effectiveness Metric
Demonstrated outreach efforts to Ecology, EPA, and/or universities	Within one year of issuance of Comp. Plan	Outreach conducted
Accelerated Green Chemistry efforts	Within two years of issuance of Comp. Plan	Tangible improvement in Green Chemistry efforts due to SRRTTF actions



PCB Product Testing Information

- New Activities
 - Support development of a clearinghouse
 - Public education on products containing PCBs

Milestone	Timeline	Effectiveness Metric
Provide comments on the Ecology PCB product testing report	Within three months of issuance of draft report	Comments provided
Support Ecology efforts towards development of a clearinghouse	Within one year of issuance of Comp. Plan	Demonstrated support, reassessed annually
Development of clearinghouse	Within two years of issuance of Comp. Plan	Has clearinghouse been developed?
Public education	Ongoing annual assessment	Has outreach been conducted?
Public education	Within five years of issuance of Comp. Plan	Measurable change in public behavior



Waste Disposal Assistance

- New Activities
 - Raise awareness on identification and disposal
 - Make recommendations to organizations

Milestone	Timeline	Effectiveness Metric
Recommendations to implementing organizations	Within one year of issuance of Comp. Plan	Recommendations provided, reassessed annually
Raised public awareness on how to identify and dispose of PCB-containing items	Ongoing annual assessment	Has outreach been conducted?
Raised awareness on how to identify and dispose of PCB-containing items	Within five years of issuance of Comp. Plan	Measurable change in public behavior



Regulatory Rulemaking

- New Activities
 - Advocate for State/Federal-level changes to color box requirements for road paints

Milestone	Timeline	Effectiveness Metric
Dialogue/letters with EPA and legislators on TSCA reform	Ongoing annual assessment	Dialogue continuing to be conducted
State/Federal-level changes to color box requirements for road paints	Within one year of issuance of Comp. Plan	Has outreach been conducted?
State/Federal-level changes to color box requirements for road paints	Within ten years of issuance of Comp. Plan	Evidence of changed regulations



Compliance with PCB Regulations

- New Activities
 - Review results of atmospheric deposition study to assess need for regulatory control of oil burning

Milestone	Timeline	Effectiveness Metric
Comments on recurring regulatory issues	Ongoing annual assessment	Recommendations provided, reassessed annually
Review of Ecology atmospheric transport study	Within one year of issuance of study	Determination of need for more regulatory control of oil burning
Changes in oil burning control (if appropriate)	Within five years of issuance of Comp. Plan	Measurable change in regulatory control



Emerging End of Pipe Stormwater Technologies

- New Activities
 - Identify/support additional research projects that meet Task Force goals

Milestone	Timeline	Effectiveness Metric
Assessment of Phase 1 results	Within one year of completion of Phase 1 report	Feedback provided
Phase 2 support	Within one year of completion of Phase 1 report	Level of support defined and provided



Category C Control Actions

New Activities

- Building Demolition and Renovation Control
- Identification of New Sites of Concern for Contaminated Groundwater



Building Demolition and Renovation Control

- New Activities
 - Adapt SFEP tool kit to make it suitable for use as guidance for area building contractors
 - Work with local agencies to ensure that the guidance document be distributed as part of all building permits

Milestone	Timeline	Effectiveness Metric
Adaptation of SFEP report	Within one year of issuance of Comp. Plan	Guidance document produced
Distribution of guidance document	Within two years of issuance of Comp. Plan	Guidance document routinely distributed with permits
Utilization of guidance document	Within five years of issuance of Comp. Plan	Measurable change in contractor behavior



Identify New Sites of Concern for Contaminated Groundwater

- New Activities
 - Mine existing data
 - Package information for, and consult with, TCP
 - Determine next actions

Milestone	Timeline	Effectiveness Metric
Initial data mining	Within one year of issuance of Comp. Plan	Assessment document produced
TCP coordination	Within two years of issuance of Comp. Plan	Study plan adopted
Identification, remediation (as appropriate)	Within five years of issuance of Comp. Plan	Conclusive identification of significance of sites. Initiation of remedial activities on sites determined to be significant.



Future Activities

- Implementation effectiveness assessment
- Consideration of additional control actions
- Studies to address data gaps



Implementation Effectiveness Assessment

- Two components
 - Annual review of implementation of Control Actions
 - Periodic review of environmental response



Annual Review of Implementation of Control Actions

- Implementation Review report
 - Compares actions conducted over the prior year to the timelines and effectiveness metrics spelled out in the Implementation Plan
- Serves two purposes
 - Confirms that commitments are being kept
 - Allows opportunity for adaptive management



Periodic Review of Environmental Response

- Review recent data to assess:
 - PCB loading to the Spokane River (and changes over the evaluation period)
 - Spokane River PCB concentrations (and changes over the evaluation period)
- Allows adaptation of Actions as necessary
- Repeated on a five-year basis



Potential Additional Control Actions

Task Force will look for opportunities to implement:

- Education on Septic Disposal
- Survey Schools and Public Buildings
- Accelerated Sewer Construction
- Emerging Wastewater Technology
- Survey Electrical Equipment
- Leak Prevention/ Detection
- Regulation of Waste Disposal
- Stormwater Source Tracing
- Removal of Carp from Lake Spokane
- PCB Identification during Inspections
- Compliance with PCB Regulations for Imported Products



Studies to Address Data Gaps

- Potential studies include:
 - Bioaccumulation of PCBs in Fish
 - PCBs in Sediments



Questions

- Are we committing to too much in Year One?
- How do address Public Involvement and Education?
- Commitment to long-term effectiveness monitoring?
- Be more specific on the basis for the 303(d) PCB listings



Year One Commitments

• Commitments currently in Plan

- Demonstrated outreach efforts on Green Chemistry
- Provide comments on the PCB product testing report
- Support Ecology efforts towards development of a clearinghouse
- Public education on PCBs in products
- Recommendations to organizations implementing Waste Disposal
- Public education identifying and disposing of PCB-containing items
- Dialogue/letters with EPA and legislators on TSCA reform
- Implementation Review report
- Review of Ecology atmospheric transport study
- Adaptation of SFEP building demolition report
- Data mining on contaminated groundwater sites
- Outreach on State/Federal-level changes to color box requirements for road paints
- Comments on recurring regulatory issues



Public Involvement and Education

- Comprehensive Plan scope says that Plan will include a section describing activities
 - designed to inform the public about the existing health advisories, effects of PCBs on human health, and on measures that the average citizen can adopt to reduce the amount of PCBs in our environment.
- Include as separate chapter or build on text already in Implementation Plan section?



Long-Term Effectiveness Monitoring

- Future Activities section commits to assessment of river concentrations every five years
- No current Ecology plans to do this, so burden may fall on Task Force
 - Ecology is planning to conduct fish tissue monitoring some time between 2020 and 2022



Comments to Date

- Be more specific on the basis for the 303(d) PCB listings
- Do not include a reference to the EPA July 2015 submission to the federal court



Comprehensive Plan Review Schedule

- First draft issued September 15
 - Initial comments requested by September 28
 - Open sharing of review comments
- Final plan due December 16
 - No formal schedule for interim draft(s)
 - Would like to set one now

