5.15.1 Actions that Can Begin Implementation in the Short Term

The Task Force determined that the following control actions can begin implementation in the short term:

- PCB Product Testing
- Compliance with PCB Regulations
- · Emerging Stormwater Technologies

Milestones, timelines, effectiveness metrics, and parties who will serve in a leadership role for each of these Control Actions are provided below in Table 11.

For the Control Action PCB Product Testing, the first milestone consists of the provision of comments on Ecology's PCB product testing report within the public comment period of the draft report. The second milestone consists of demonstrated support to Ecology, regarding development of a PCB product testing clearinghouse. This support will consist of three steps: 1) Initial outreach to Ecology to determine if/how the Task Force can provide support, 2) Definition of the specific support to be provided, and 3) Provision of support. Initial outreach will be conducted within one year of issuance of the Comprehensive Plan, and future schedules assessed as part of the Implementation Review report. Initial public education efforts will be conducted within one year of issuance of the Comprehensive Plan, with more detailed effectiveness metrics for public education defined below in Section 5.15.2 on Actions That Require Development of New Work Plans.

For the Control Action Compliance with PCB Regulations, the first milestone consists of maintaining existing activity in terms of providing comments on recurring regulatory issues. Comments will be provided on an ongoing as-needed basis, and assessed as part of the Implementation Review report. The second milestone consists of review of the Ecology atmospheric transport study, and a determination made regarding the need for more regulatory control of atmospheric sources such as used oil burning. Should atmospheric sources be identified as a contributor of PCBs worthy of additional controls, the final milestone consists of providing support to agencies on regulatory revisions regarding the relevant sources.

For the Control Action Emerging End of Pipe Stormwater Technologies, the first milestone consists of the Task Force reviewing the Phase 1 results of the Lands Council work, and providing feedback on next steps. The second milestone consists of identification of the appropriate level of Phase 2 support, and provision of that support. Review and comment of the Phase 1 report will be accomplished within one year of completion of the Phase 1 report, while identification/provision of support will be provided within three months of the submittal of comments.

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Table 1. Milestones, Timelines and Effectiveness Metrics for Actions that Can Begin Implementation in the Short Term

Control	▼	Action Timeline	Measurement	Lead Group
Action	Milestone		Metric	
PCB Product Testing	Provide comments on the PCB product testing report	Within public comment period for draft report	Were comments provided?	Full <u>Task Force</u>
	Provide input to Ecology in support of its efforts towards development of a clearinghouse	Initial effort within one year of issuance of Comprehensive Plan; evaluate effort needed annually	Was input provided? (see text for discussion)	Full Task Force or individual members as appropriate
	Provide public education on PCB containing products	Annual review of outreach activity	Has outreach (e.g. disseminating information when tabling at events, educating youth at outreach events, and/or presentations at social civic groups) been conducted?	Education and Outreach Work Group
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Compliance with Existing PCB Regulations	Provide comments on identified regulatory issues	Within public comment period for issues that are identified	Were comments provided on identified issues?	TSCA Work Group or full <u>Task Force</u> as appropriate
	Review Ecology's atmospheric deposition study results	Within public comment period for draft report	Was report reviewed and input provided?	Technical <u>Track</u> Work Group
	Support agencies on regulatory revisions that are driven by Ecology's atmospheric deposition study	Within public comment period for draft report	Was input on regulatory revisions provided?	TSCA Work Group or full <u>Task Force</u> as appropriate
Emerging Stormwater Technologies	Review of Phase 1 results	Within twelve months of receiving Phase 1 results report	Was report reviewed and comments provided?	Technical <u>Track</u> Work Group
	Support Phase 2 if Phase 1 results warrant	Within three months of reviewing Phase 1 results report	Was support defined and provided if appropriate?	Technical <u>Track</u> Work Group

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Deleted: Support Ecology's clearinghouse by evaluating public awareness improvement

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5.15.2 Actions That Require Development of New Work Plans

The Task Force determined that the following Control Actions were important to implement, but will require additional consideration and development of specific work plans before schedules can be developed for them.

- Support of Green Chemistry Alternatives
- Waste Disposal Assistance
- · Regulatory Rulemaking
- · Building Demolition and Renovation Control
- Identification of Sites of Concern for Contaminated Groundwater

Work plans containing milestones, timelines, and effectiveness metrics for each of these Control Actions will be developed within one year of issuance of the Comprehensive Plan.

While not technically a Control Action, a work plan will also be developed within one year of issuance of the Comprehensive Plan pertaining to education and outreach. Because the connections between sources of PCBs and their potential eventual arrival in the water column and aquatic food web often involve human behaviors, education will be a key aspect in controlling their transport and fate. SRRTTF outreach and education will focus on effectively changing behaviors to reduce toxics in the Spokane River. An ongoing Education and Outreach work group will explore additional funding to enhance existing member educational efforts. The group will implement a comprehensive outreach strategy with measurable targets to assess implementation and outreach effectiveness. To that end, the SRRTTF will also optimize existing opportunities (events/media) to change behaviors and reduce PCB loading to the Spokane River.

Original Table 11 from 10/31 draft, now replaced with the one above.

Control Action	Milestone	Timeline	Effectiveness Metric	Leader ¹
PCB Product Testing	Provide comments on the PCB product testing report	Within three months of issuance of draft report	Comments provided	Spokane County
PCB Product Testing	Support Ecology efforts towards development of a clearinghouse	Within one year of issuance of Comprehensive Plan	Demonstrated support, reassessed annually (see text for discussion)	Ecology
PCB Product Testing	Development of clearinghouse	Within two years of issuance of Comprehensive Plan	Has clearinghouse been developed?	Ecology
PCB Product Testing	Public education	Within one year of issuance of Comprehensive Plan	Outreach conducted (e.g. disseminating information when tabling at events, educating youth at outreach events, and/or presentations at social civic groups)	Education and Outreach Work Group
Compliance with PCB Regulations	Comments on recurring regulatory issues	Ongoing annual assessment	Recommendations provided, reassessed annually	Task Force
Compliance with PCB Regulations	Review of Ecology atmospheric transport study	Within one year of issuance of study	Determination of need for more regulatory control (e.g. used oil burning)	Task Force – Technical Track Work Group
Compliance with PCB Regulations	Changes in regulatory control of atmospheric sources	Within five years of issuance of Comprehensive Plan	Process initiated towards change in regulatory control	Task Force
Emerging Stormwater Technologies	Assessment of Phase 1 results	Within one year of completion of Phase 1 report	Feedback provided	Task Force - Technical Track Work Group
Emerging Stormwater Technologies	Phase 2 support	Within one year of completion of Phase 1 report	Level of support defined and provided	Task Force - Technical Track Work Group

 $[\]label{eq:conducted} \begin{array}{l} {}^{\mbox{\tiny 1}}\mbox{The entity listed as Leader is a suggestion of who will take primary responsibility to see that the task is conducted. Others, of course, are welcomed and encouraged to support the activities involved.} \end{array}$