

Spokane River Regional Toxics Task Force Technical Track Work Group (TTWG) Meeting

May 3, 2017 | 10:00 a.m. –12:00 p.m.

Department of Ecology | 4601 N. Monroe St. | Spokane, WA 99205

Meeting Documents: <http://srtrtf.org/?p=7907>

Attendees:

BiJay Adams (phone) –Liberty Lake Sewer &
Water District

Kevin Booth –Avista

Adriane Borgias –WA Dept. Ecology (Ecology)

Dave Dilks (phone) –LimnoTech

Jeff Donovan –City of Spokane

Brent Downey –Kaiser

Brandy Era-Miller (phone) –Ecology

Kathy Falconer –Ecology

Bill Fees –Ecology

Kris Holm (phone) –City of Coeur d’Alene

Sarah Hubbard Gray (phone) –Spokane River
Stewardship Partnership (SRSP)

Dave McBride (phone) –WA Dept. of Health

Doug Krapas –Inland Empire Paper

Mike LaScuola –Spokane Regional Health
District

Bud Leber –Kaiser

Eric McConnell –Ecology

Dave Moss –Spokane County

Monica Ott –City of Post Falls

Chris Page (video) –Ruckelshaus Center

Bryce Robbert –Avista

Jeremy Schmidt –Ecology

Kara Whitman –Ruckelshaus Center

Introductions and Agenda Review:

After a round of introductions, the group made no changes to the agenda.

Updates:

- The Environmental Protection Agency (EPA) held a listening session on May 2, 2017 that had more than four hours of comments on the Toxic Substances Control Act (TSCA). EPA will issue a Summary for the meeting.
- Task Force meeting with EPA region 10 and EPA headquarters (~20 EPA attendees). The discussion eventually ended with EPA headquarters saying they can't do anything about TSCA. Lucy Edmondson (EPA Region 10) said they would take a leadership role to assist the Task Force in charting a path forward. The Task Force attendees at the meeting were not very encouraged by the dialogue. PCBs are not important to headquarters at this time in the big picture – top of the pipe solution. EPA headquarters not in a problem-solving mode yet.
- The group discussed the need to pull an advisory group together to approach region 10 with a strategy. The TSCA work group will give a brief update at each Task Force meeting. (Note: put on Task Force agenda)

Letter to EPA

Doug Krapas gave an overview of the letter he drafted on behalf of the Task Force (re: Docket ID No. EPA-HQ-OA-2017-0190-TSCA Inadvertent PCB Allowance Discrepancy with Water Quality Standards). The comment letter is due May 15th. The group discussed and made edits to the letter.

ACTION ITEM: Ruckelshaus Center to make the TTWG-suggested edits and send the revised draft to the full Task Force for review. (COMPLETE)

ACTION ITEM: Task Force Meeting to be held on May 10 at 10am by phone. “Can you live with it?” TTWG has already reviewed and provided their edits/feedback. (COMPLETE)

ACTION ITEM: Adriane Borgias to send link to where the document should be submitted. (COMPLETE)

ACTION ITEM: Final version of the letter, if agreed upon at May 10th meeting, to go to EPA by Ruckelshaus Center on behalf of the Task Force. (COMPLETE, submitted 5/11/17 online, and submitted hard copy via mail)

LimnoTech Presentation: 2016 Monthly Sampling and Report on 2016 Technical Activities

Dave Dilks reported that LimnoTech has successfully validated the sampling data from December 2016, with no change in the findings from previous presentation. “Something strange” occurred with the May 2016 data for the outlets from the Cities of Coeur d’Alene Post Falls: typically, these locations show below 40 pg/l, but in May they came in between 75-80. Both cities used the same lab (AXYS) and sampler (Gravity).

A small PCB signal appeared during wet weather. In addition, closer inspection of the distribution of the elevated concentration at the mouth of Latah creek may indicate a stormwater source as the cause of PCB spikes in Hangman/Latah Creek (1254 and 1260 aroclors). The sample was taken at Latah Creek gage; 150’ above the gage is a major stormwater discharge from Sunset Hill. Dave explained that concentrations are generally low in Idaho, with more variation in Washington, and slightly higher levels in response to rain event in October. Dave will distribute the technical report, field report, and data for review shortly.

Q&A/Comments

- **Q.** Combined Sewer Overflow (CSO) load: was this during a stormwater discharge or a CSO discharge? **A.** Have samples from stormwater, did not have a CSO sample, using average historical data. Fingerprint looks similar to stormwater (see recap slide)
- **Q.** Recommendations for further sampling? **A.** More data is always better, but no obvious gaps now.
- **Q.** Any changes made in response to the new standard for water quality? **A.** Dave changed some of the wording in report.
- **Q.** How does the report address blank correction? **A.** LimnoTech will qualify what blank correction is in the report. They used semi-quantification with low blank correction (3x) to see the PCB signal.

Future PCB Sampling

- **Q.** How much data does the Task Force need to support review of performance on meeting water quality standards? Should the TTWG recommend continued water testing to demonstrate progress? **A.** Ambient water data is the only way to track water improvements. Suggestion to do it 1x/year in August, when higher detection is possible. LimnoTech advised having a clear purpose for any future sampling, noting that assessing long-term trends is a different type of monitoring that what the Task Force has previously done.

The group discussed the possibility of continued monitoring, deciding that this could be a good topic of discussion for the next technical workshop. The starting point would be laying out all existing data, and determining the purpose of any sampling and analysis—this will tell the group if more data is needed (those steps could be part of another scope of work for LimnoTech).

Ecology does ambient monitoring similar to the Dissolved Oxygen Total Maximum Daily Load (DOTMDL); could Ecology do this work in yearly monitoring? Brandee Era-Miller explained that Ecology does ongoing monitoring. During Environmental Assessment Program (EAP) project planning, they prioritize work with different regions and programs. There is room in the future for EAP to potentially do this type of monitoring, based on prioritization of projects and availability of resources. Currently, EAP has multiple projects are going on that will assist the Task Force, e.g. five PCB monitoring events with suspended sediments using the CLAM (they have gotten the CLAM to work pretty well by replacing the housings with steel. Brandee suggested that EAP could present multiple data sets from all of the EAP projects they have been working on at a fall meeting our workshop. Can continue with this conversation at the June 7th meeting.

ACTION ITEM: Report ready for potential approval at May 31st Task Force meeting. Pre-final draft out by May 4th (comments by May 17th); more formal draft to be posted by May 24th for decision at May 31st meeting.

ACTION ITEM: Ruckelshaus Center to add long term status monitoring as an agenda item to talk about at the next TTWG meeting. (COMPLETE)

Ecology Environmental Information System (EIM):

Adriane Borgias gave a brief overview of searching the EIM database and the recently uploaded data from Urban Waters. Task Force members can easily search the database using the search term (SRUW -Spokane).

Up-gradient sources: Background on Spokane Business & Industrial Park

Sarah Hubbard-Gray reviewed the history of the site. She was hired in 1992 by AVISTA (WA Water Power) as an environmental manager, and worked out of the Spokane Industrial Park (she is not up to speed on current issues with the site). The site was developed in 1942 as naval supply depot and has been an industrial park since 1960. The site had 4.2 million square feet of leasable space, occupied 500 acres, and contained four production wells. Sarah does not know if they have all been tested for PCBs.

At the time she worked there, there was a private onsite Waste Water Treatment Plant (WWTP) that discharged to river. While she was working with them, they identified, investigated, and remediated contamination at approximately 22 sites under the Model Toxics Control Act (MTCA). Via an agreement with Spokane County utilities, they got connected to the County sewer system so the WWTP was abandoned. Final MTCA reports should be on file at the Department of Ecology's Eastern Regional office. During this time, they did environmental outreach, education, and audits, which resulted in awards for environmental cleanup. In the late 90's the industrial park was sold to Crown West Realty. Sarah is not sure if they are still current owners.

Spokane Industrial Park

Mike LaScuola discussed the site hazard assessment (SHA) and cleanup of the Spokane Industrial Park. The Regional Health District did the SHA, and it had an independent cleanup involving waste disposal of contaminated dry well soils. They vactored out all implicated dry wells, piled them, characterized them, and sampled the bottom of the wells (not horizontal). Those did not exceed MTCA cleanup levels. They did find other associated materials. Much of the property is now vacant which may allow access to do sampling. Mike thinks it likely some residual PCBs exist on the site.

The WWTP was demolished in 2010 and did have metals remediation—this could also be a source of PCBs (sediment in the structures/piping, a process related to PCBs). In the 1990's there was some effort to look at the Navy's operations, but no specific PCB link to Navy operations was found. They could also look at sites that may have been landfills by looking at back records for hazard waste toxics reductions. There is a report at Ecology on a site that had this done.

Overview of Pilot Project Kaiser –update on Pilot Treatment system:

Bud Leber gave an overview of Kaiser's groundwater treatment pilot project. This project is the result of a thorough site assessment, feasibility study, and an agreed order (#2692). The project is a groundwater extraction, filtration, and re-infiltration project. The idea is to extract high concentration water at low flow, treat the water to remove PCBs (to some level) and then re-infiltrate it, up-gradient. This includes holding tanks, pretreatment monitoring, walnut shell filters, castor oil treatments, backwash prevention (3300 gallons per backwash, one backwash per run), and re-infiltration. The testing protocol includes running 32 gallons per minute. They have done six runs total so far with different levels of castor oil. They measure bed volume (BV) once every 50 BVs (at a cost of \$15,000 per run). The extraction system is having an impact. They need to figure

out how to maximize the concentration of PCBs extracted from groundwater. They still have some questions that need to be answered regarding castor oil ppm impacts.

Ecology Toxic Cleanup Program (TCP): Potential Process for Part Three of Comp Plan Task 5.14

Sandy Treccani and Jeremy Schmidt provided a [stepwise flowchart](#) on how to tackle Comp Plan Task 5.14. Dave Dilks thinks the approach makes sense. However, the starting box in the diagram includes the step “confirm contamination from a site,” and Dave explained (by email) that based preliminary homolog-specific mass balance results, he suspects that the back-calculated fingerprints will be fuzzy enough that they will not allow LimnoTech to strongly “confirm” anything. The Task Force may want to add a precursor step for assessing sites strongly suspected of contributing (but not confirmed).

Bill Fees explained that the Task Force needs credible evidence that contamination is at a site to utilize the TCP system. Further, even with better testing methods available, the cleanup standards have not changed. Therefore, they would need strong indications that there is a reason to investigate PCBs for a site. TCP starts by identifying a site or specific geographic area (process is site-driven). There could be a well put in a right-of-way upgradient of the industrial park. Installing wells may be the fastest route to narrowing the geographic scope. TCP does not have a lot of money to investigate this plume and this may be on Task Force to find.

Programmatic Aspects: Kathy Falconer, TCP section manager, is taking a broader look at this entire issue about how the program functions.

The next SRRTTF meeting is on May 10th at 10:00 via conference phone
Next regular Task Force meeting: May 31, 2017 Spokane County Water Resource Center, 9:00am-12:30pm
The next TTWG meeting: June 7th, 2017 from 10:00am-12:00pm at the Department of Ecology