

Comments on: *Spokane River Regional Toxics Task Force 2016 Monthly Monitoring Report*,
Draft May 4, 2017

From: Spokane County Environmental Services

Date: Comments prepared May 15, 2017

Comment 1

Page 5, paragraph 1, sentence two reads:

... provide ~~date~~ data useful...

Suggestion:

- Correct the text

Comment 2

Page 6, figure 1

Figure one should be revised to show:

- Add Barker Road as a sample site for the sample collected in April 2016
- Eliminate the indicator for “in-stream (gage location) for outlet of Lake Coeur d’Alene and Trent Bridge because those sites did not have active flow measurements during the study.

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Suggestion:

- Revise figure 1 as noted.

Comment 3

Page 8, paragraph 1 reads:

A number of December field samples were not reviewed because of unacceptably high PCB contamination in the laboratory method blank samples.

Suggestion:

- Please provide a table of all PCB blank samples collected in the study, and prepared in the laboratory analysis. It is helpful to understand the magnitude of uncorrected blank samples.

Comment 4

Page 8, section 2.4.2 Blank Correction

The section describes the blank correction method used for summing PCB congener to calculate total PCBs. Was this same blank correction method used for totaling PCB by homolog?

Suggestion:

- Describe if PCB homolog values in the report are blank corrected.

Comment 5

Page 9, top of page:

March October 2016 Stormwater Loading Assessment by City of Spokane

Suggestion:

- Correct the text

Comment 6

Page 9, section 2.5.2:

This section describes sampling by Idaho NPDES permit holders, but doesn't name the lab that conducted the PCB analysis.

Suggestion:

- Provide the name of the lab that conducted PCB analysis for the Idaho NPDES permit holder collected samples.

Comment 7

Page 10, section 3.1:

The report states:

PCB concentrations are generally less than 40 pg/l leaving Lake Coeur d'Alene and throughout the Idaho sampling locations, and increase as the river passes ~~through the Spokane metropolitan area~~ the Trent Avenue sampling site.

It appears that PCB concentrations increase at Trent Avenue.

Suggestion:

- Revise the text as noted.

Comment 8

Page 10, Figure 2:

- What is the sample noted in April, just upstream of Trent Avenue, approximately 55 pg/L? Is that a sample collected at Barker Road? If so, it is not the right concentration.
- What is the April sample at Trent Avenue, approximately 20 pg/L? There was no sample collected at Trent Avenue in April.

Suggestion:

- Revise figure 2.
- Add a Barker Road sample site on the figure X-axis.

Comment 9

Page 11, Table 1:

- The sample listed for Trent Avenue in April is noted as having been collected at Barker Road. Barker Road should be added to the table and have a sample from April. This will reduce confusion in data interpretation.

- Trent Avenue June sample is listed at 6 pg/L. From Table A-2, the concentration was 65 pg/L.

Suggestion:

- Revise table 1.

Comment 10

Pages 16 through 19, section 4.2 Loading contributions

This section provides multiple figures based on several undefined calculations, and then states:

- ...results from any mass balance assessment should be viewed with caution.*
- ...it is noted that a single sample may not adequately characterize actual concentrations.*
- ... using these observed river loads is speculative at best.*

Additionally, section 4.2 doesn't provide information to repeat the analysis, and;

- It is not defined what flow measurements were used to develop load values. The gaged sample sites were Greene Street, Spokane Gage, Hangman Creek, and Ninemile (following June 1, 2016).
- The loading analysis skips sample sites Barker Rd, Trent Avenue, and Greene Street.

The shaded cells in the table below represent samples sites with concurrently collected flow information. A loading assessment could likely be conducted between the shaded cells:

	March	April	May	June	October	December
Nine Mile	100	68	187	62	105 (118)	59
Hangman (Latah) Creek	41	31	19	7	1053	38
Spokane Gage	64		50	63 (52)	207	10
Greene St.	67	76	87 (27)	78	135	9
Trent Ave.	51		112	6	52	169
Barker Rd		16 (17)*				
Lk. Coeur d'Alene	14 (14)	33	17	3	18	

Suggestion:

- Revise section 4.2 using sites with flow measurements.
- Provide additional discussion or description on impacts of uncertainty in laboratory analysis on the load estimates.

Comment 11

Page 20, section 4.2, third paragraph:

The comparison of October 2016 stormwater and the Hangman Creek sample with several Aroclor homolog patterns could be improved. For example, if Aroclors 1254 and 1260 are combined in equal parts (50-50 split) the resulting homolog pattern is quite like the stormwater and Hangman Creek samples.

Suggestion:

- Provide additional discussion of the potential sources of homolog patters in the October 2016 stormwater and Hangman Creek samples.

Comment 12

The report does not provide any conclusions or recommended next steps.

Suggestion:

- Provide conclusions or recommended next steps.