

SENT VIA EMAIL TO: swon461@ecy.wa.gov

February 28, 2018

Siana Wong, Environmental Assessment Program
Washington Department of Ecology
Headquarters Office
300 Desmond Drive SE
Lacey, WA 98504-7600

RE: Avista comments on Ecology's DRAFT Evaluation of Fish Hatcheries as Sources of PCBs to the Spokane River

Dear Ms. Wong:

Avista appreciates the opportunity to provide comments on the DRAFT *Evaluation of Fish Hatcheries as Sources of PCBs to the Spokane River* (Report), distributed February 13, 2018. We have the following comments.

General Comments

We appreciate that the Report is generally clear and easy to follow. The data summarized in the Report fill an important data gap in understanding regional background levels of polychlorinated biphenyls (PCBs) in recreationally consumed fish, in this case from typical regional hatchery operations. The study also provides information to further refine the PCB loading mass balance in the Spokane River.

However, the Report could be improved to provide more clarity on key findings, also removing several unsupported speculative observations. Our primary recommendations are as follows:

- Further expand on hatchery PCB mass balance calculations, which appear to suggest that hatchery fish were likely accumulating most of their PCBs from non-fish food sources within the hatchery (e.g., PCB-containing paints); PCB-contaminated fish feed appears to be a less important source of PCB loading from hatchery operations.
- Remove speculative observations regarding possible changes in water column PCB concentrations in the slough below the Spokane Hatchery, as there is no statistically significant change in levels apparent in the slough data; speculative statements regarding sediment contributions should also be removed, as the study data are not sufficient to determine whether slough sediments are a net source or sink of PCBs in this environment
- Remove the term "effluent" in this document in describing hatchery discharges, as that term is more appropriately applied to municipal and industrial wastewater flows.

Specific Redlines

We have enclosed a redlined version of the Report with specific edits to help improve clarity and accuracy.

Ms. Siana Wong
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Thank you for the opportunity to comment. Please feel free to contact me at (509) 495-2941 if you have any questions or wish to discuss these comments further.

Sincerely,

A handwritten signature in black ink that reads "Bruce Howard". The signature is written in a cursive, flowing style.

Bruce Howard
Director, Environmental Affairs

Enclosure

cc: Brandee Era-Miller, Ecology