Spokane River Regional Toxics Task Force Meeting

DRAFT Meeting Notes
Facilitated by White Bluffs Consulting (Ben and Lara Floyd)
Wednesday, October 24, 2018 | 8:30 a.m. – 12:15 pm
Liberty Lake Sewer and Water District |22510 E. Mission Ave, Liberty Lake, WA
Meeting Documents: http://srrttf.org/?p=9632

Attendees:

Voting Members and Alternates (*Denotes Voting Member)

Tom Agnew*, BiJay Adams – Liberty Lake Sewer and Water District
Doug Krapas* – Inland Empire Paper
Bruce Williams, Vikki Barthels – Spokane Regional Health District
Bud Leber*, Brent Downey – Kaiser
Mike Hermanson – Spokane County
Jeff Donovan – City of Spokane
Mike Petersen* – Lands Council
Rich Watson – WA Department of Fish and Wildlife
Mike Zagar – Kootenai Environmental Alliance
Dave McBride* (phone) – WA State Department of Health

Advisors:

Adriane Borgias, Karl Rains, Bill Fees, Jim Pendowski, Catherine Glick, Jeremy Schmidt and Heather Bartlett; Brandee Era-Miller, Kari Trumbull, Debby Sargeant and Cheryl Niemi (phone) - Department of Ecology (Ecology)
Lucy Edmondson, Brian Nickel (phone) – Environmental Protection Agency (EPA)
Joel Breems – Avista

Interested Parties:

Lisa Dally Wilson – Dally Environmental and the Spokane River Stewardship Partnership
Lauren Heine – Northwest Green Chemistry
Jim Kimball, Paul Klatt – JUB Engineers
Dave Dilks (phone) – LimnoTech
Elsa Pond (phone) –Washington Department of Transportation
Jay West (phone) – American Chemistry Council (ACC)
Raleigh Davis, Riaz Zaman (phone) – American Coatings Association (ACA)
Michael Ober (phone) – Titanium Dioxide Stewardship Council
Natalie Rogers (phone) – Latham and Watkins representing Monsanto
Kris Holm (phone)

Introductions and Agenda Review:

After a round of introductions, Ben Floyd, White Bluffs Consulting (WBC), went over the agenda.

Meeting Notes Review:

The Task Force Reviewed August 22, 2018 notes.

DECISION: The Task Force approved the August 22, 2018 meeting summary with no changes. Lara Floyd, WBC, will post them to the website.

Measuring PCBS in Biofilm, Sediment and Invertebrates in the Spokane River: Field Work Update

Brandee Era-Miller, Ecology, provided the update. Samples were collected the last week of August. The sampling team was able to collect all biofilm samples at all sites pretty easily and and able to collect all samples in the week. Biofilm samples were collected in the same locations as the 2018 synoptic survey water column samples. They collected sediment samples at Hangman Creek, mainstem near Gonzaga (GZ-SED), and Plantes Ferry. For Plantes Ferry area, they had to go downstream of the intended site, but found sediment in a backwater area. Two of three invertebrate samples were collected, but none around the Mirabeau area. Samples were sent to the SGS AXYS laboratory for PCB congener data analysis. It was noted that the were similar biota (taxa) in biofilm in a lot of the samples. Biofilm and invertebrate samples are also being analyzed for carbon-nitrogen stable isotopes which helps to determine trophic level status.

Presentation on Product testing: PCBs in Fish Hatchery Products

Kari Trumbull from Ecology presented product testing study findings. The associated report should be available to share with the Task Force by January 2019. The results in the presentation are not expected to change.

Q and A/Comments:

- Did you look at the variation between different products or did you do multiple analyses of one product? *With these data we can't say one product is better than another product in regards to having lower total PCBs. In the study, a sample was taken from one bag of product (a discrete grab sample) and then tested. Ecology did not look at the variation between different products because there was not enough data and samples to reliably make comparisons. For three fish feed products, two samples were analyzed for the same product name but the fish feed products were located at different hatcheries and had different manufacture dates.*
- Another analysis of other fish hatcheries looked at paint products, caulking, etc. Do you intend to test those products also? *For the fish hatchery category, Ecology tested products that were added to the water with a focus on high volume products (noting not all "high volume" products were tested). Ecology has not tested paint products and caulking specific to those used in fish hatcheries or tested samples from fish hatchery facility infrastructure. The previous Ecology study (published in 2016) tested some paints and caulk. At this time, no plan exists to further test these items.*
- The Task Force is primarily driven by PCBs in fish. To what extent fish do raised in the hatchery environment bioaccumulate PCBs before they enter the system*? In fish feed there are Aroclors and inadvertent PCBs. [Provided by Brandee Era-Miller as follow up: In 2016 Ecology completed a study of fish in hatcheries and in the Spokane River. They looked at fish before they were released from the hatchery and while in Lake Spokane and there were higher concentrations of PCBs in the fish in Lake Spokane. "From the time that fish were raised in the hatcheries, released to Lake Spokane, and have spent about four months living in the lake, the average concentrations of PCBs in fish tissue more*

than tripled." (Evaluation of Fish Hatcheries as sources of PCBs to the Spokane River, Publication No. 18-03-014, April 2018, page 28)

Presentation on Well Input and Suitability for Upgradient Sampling Study Findings:

Bud Leber provided background on the study findings. The study focused on PCB monitoring data from groundwater sources upgradient of the Kaiser facility. A main question addressed by this study: Are the PCBs in the wells making it across the Kaiser site and all the way to the river? There were five tasks in this subtask. The first two tasks identified where monitoring wells exist and gathered all the data from Ecology databases for these wells. Two tasks were taking all the 1668 groundwater data compiled over the years and LimnoTech went through to analyze the data and see if upgradient groundwater made it across the Kaiser site and to the river. Dave Dilks, Joyce Duncan and Tim Towey from LimnoTech gave the presentation.

Q and A/Comments:

- Does the upgradient PCB appear to be Aroclor 1248 and 1254? *Not necessarily. The largest contributor to the background well resembles Aroclor 1254. A pattern dominated by PCB-11 and PCB-18 also contributes to the sampled wells. Before committing to any additional monitoring, the technical team is proposing to analyze results of the 2018 SRRTTF synoptic survey and identify potential loading just upstream of Kaiser. Analysis will also include results from the Ecology periphyton study. Potential next steps are targeted monitoring of groundwater/surface water interface, sample shorter segments of groundwater next to the River, and revise existing estimates using data from wells closer to the river on the north side.*
- Aroclor 1254 appears to be the primary source of upstream contributor. *There is a pattern that resembles 1254 but can't definitely say it is that.* If there is a background concentration coming into Kaiser it appears it is something similar to Aroclor 1254? *Yes, it's showing up downgradient of Kaiser. The pattern with PCB-11 was most prevalent in samples with low concentrations.*
- Has there been any historical research in the industrial park? There is a landfill, former wastewater treatment plant, etc. nearby and about 400 wells on the park as well. It would be good to figure out the landscape of the area before moving forward. A few years ago Ecology conducted a study where we collected groundwater samples. Was that information included? *There is work that could be done to look at potential sources but the plan is to see first if there is a big enough source to see to further evaluate what may be contributing. In the Ecology funded study, Sullivan Park had one well that was sampled. This well was evaluated and there were zero PCBs, but it was more cross gradient. Spokane Valley school well is not upgradient either. The only well off-site may be Cominco. LimnoTech completed a memo that described all the results and sampling that Adriane mentioned and distributed it to the Task Force.* (Here is the link to the report: http://srrttf.org/wp-content/uploads/2018/01/Ecology-County-SVRP-PCB-Sampling-report-final-draft-170503.pdf)
- Did LimnoTech include some of those wells referenced in the Ecology study in the pattern analysis? *No, they were not used because concentrations were so low.*

- When will an accurate assessment be conducted of the upgradient groundwater PCBs? *If the priority is to figure out magnitude then it may be necessary to sample in the River at shorter segments. Punching in well points along the river is also an option. The study provides the best estimate based on the available data.*
- One thing to consider is the data set for background was collected from 2010-2017 and the concentrations were highest in 2010. The high concentrations seem to be a transient effect and these same levels have not shown up in the last few years.
- The Task Force should review data and the highest hits were definitely 2010-2012. The lower concentrations in the past four or five years may be due to clean up efforts.
- Are the four wells by the river upgradient or are they cross gradient to the groundwater flow direction? A harder look at upstream could show some cross movement of the PCBs. M*ore data will be available in a month, including more upstream data.*
- One option moving forward is to compare patterns from the atomospheric sampling to those of the upgradient wells. If they match that could indicate the source is stormwater that's infiltrating into these wells. It is important not to leave any stones unturned.

DECISION: The Task Force approved the Groundwater PCB Sources Upgradient of Kaiser Trentwood Facility: Task 5A & 5B Findings Technical Memorandum

Presentation of River PCB Mass Balance Study Findings:

Dave Dilks gave the presentation. The study focused on losing reaches vs gaining reaches. The Upgradient work group had asked that there be two samples collected, one at Mirabeau and the other at Barker Road. Synoptic surveys in 2014 and 2015 supported mass balance assessments that quantified groundwater PCB loads to the Spokane River but some questions still remained. In 2018 data was collected to specifically address the remaining questions. The survey was conducted Aug 4 - 8 and roughly half the samples are processed now. The mass balance assessment will be done in November and the next status update will be at the December Task Force meeting.

- In previous synoptic surveys there were issues with flow at Nine Mile. Was that successfully measured this time? *Yes*.
- Was Kaiser effluent sampled? *No, the objective was to sample downstream reaches of the River and we added a few upstream. It was not to sample discharge. We have Kaiser's regular effluent monitoring data available, as needed.*

Green Chemistry Phase 1 White Paper:

Karl Rains, Ecology introduced this topic and Lauren Heine with Northwest Green Chemistry. Lauren finished the draft Green Chemistry Phase 1 White Paper in July and has received comments from the Task Force and others through September. Comments on the White Paper were received from ACA and CPMA, American Chemistry Council, Doug Krapas, Inland Empire Paper and Brian Nickel, EPA. Brian helped clarify some errors in numbers in the regulations. Lauren addressed every comment and used a response matrix to track them. Some reviewers

felt there was too much focus on PCBs in pigments. Lauren clarified that pigments are only one source but very relevant to Spokane. Another reviewer said that it may not be appropriate to assume toxicity of higher congeners. EPA work on PCB 11 acknowledges uncertainty of toxicity of all the congeners. A conservative but pragmatic approach focusing on total loading rather than risk was applied. Another comment suggested minimizing discussion on legacy PCBs, so some of this discussion was reduced. Titanium Dioxide discussion was also minimized because phase 2 work will include a white paper on this topic. When two paints were evaluated they were not found to contain PCBs. Lauren thanked ACA for providing Japanese METI documents on PCB testing in pigments.

Questions/Comments:

- Jay West commented that they are eager to be a resource for the questions in the Phase 2 report and noted there is a new reference in the White Paper on absorption into TiO^2. Be careful with assumptions that associated PCBs are actually from the manufacturing process, as they could be a result of environmental factors.
- Did the sample of $Ti0^2$ use EPA research method 1668? *Two of the paints were known to contain TiO^2 and these were also evaluated for PCBs but the results were negative. Not sure of the specific sampling method used.*
- What is your timeline for the TiO^2 paper? We will have *a draft in December with a final by February.*
- One of the samples for the yellow plastic bag on page 38 is so out of character with the other samples. *That was cited from Lisa Rodenburg's report from 2008.*

DECISION: The Task Force Approved the Phase 1 White Paper

Strategy Confirmation – 2019 WA Governor/State Legislative request update:

Doug Krapas gave the update. The letter to the Governor was submitted for a funding request and our lobbyists continue to try to get it in the Governor's budget. We will know more by December.

Information update on the recent permitting process and upcoming Nov. 5 meeting:

Adriane Borgias shared that there are two things happening related to the permitting process. One is to develop agreed orders with permittees to include some permit specific requirements. Ecology considers these orders as a bridge during the permitting process that communicates with the public what Ecology and the permittees are doing to find and reduce sources of PCBs and also contains permittee-specific actions. The initial draft of the agreed orders are completed and they are at the Washington State Attorney General's (AG) office now, and should be completed soon. Ecology will have a second round of discussion on the draft agreed orders with the permittees.

The other item was addressed by Karl Rains. Karl noted that on November 5th Ecology will have a second public workshop to follow up on tools and more details about the variance process. A

draft agenda should be out by the end of the week. It will be an educational meeting for dischargers and the public about the variance process.

Project Management & Work Group Reports:

ACE Commitment Report: Bud Leber - The report identifies all the contracts to track balances that are committed. We are $21,000 over-committed on paper but in reality there is $88,000 spent since July 1 which is recoverable through the contract with Ecology. So in reality, there is a $60,000 balance.

- Are the committed funds those that are under contract but haven't been spent? *Yes, and we can add excess back in when the contracts are closed out.*
- It would be nice to see the balance of the Ecology grant instead of a negative balance.

Data Management: Mike Hermanson, Spokane County – Data Management had a call on October 15. The group decided this work group is still needed. CDM and Spokane County, along with others, have been working on the database for the past 1.5 years and it is working well. What are the steps going forward? There is a desire to have an official database maintained. There is a wide range of data to include and the group will be looking at ways to make it available to the public. The work group is planning to hold monthly meetings going forward, scheduled for the second Thursday of each month at 3 pm. Confirmation of these calls being held will occur when a meeting agenda is sent out. Amy Sumner, Spokane County is doing management of the database now. She has scheduled time with Brandee Era-Miller and Joel Breems, Avista to help with this and is planning to develop a user guide for the database.

PMF Analysis: Mike Hermanson - The data was entered into the database for this work and provided to Dr. Lisa Rodenburg. The group is evaluating how best to evaluate blank contamination within the analysis. The work group had a call the first part of October to discuss different methods and what blanks method will be used. What correction method would provide the least amount of bias and can you really do analysis at this low level? Dr. Rodenburg has conducted initial analysis of uncorrected and corrected data. Next steps are to continue to work with analysis and have a draft report for Phase 1 possibly within the next month. We will have a call to discuss it and provide another draft with a presentation to the Task Force, probably at the February 2019 meeting.

Questions/Comments:

- What's the confidence level for the PMF results using 1x blanks*? Even without blank correction Dr. Rodenburg can identify factors for blank contamination, as other components show through. She was pleased with the analysis results. The subtraction method appeared to show results that were less accurate.*
- She was able to identify the blanks for the 1x? *No, she's taking corrected data and through the analysis was able to develop a factor that looks like the blank. She was able to identify blank levels in lower weight congeners.*
- Is the Phase 2 work where we will see all the analysis to date? *The next phase is to throw in discharger data. June 30 is the final date for having all the analysis completed and report finished.*

Education and Outreach: Vikki Barthels, Spokane Regional Health District – Vikki thanked the work group leads for providing summaries for the website. Lee First from Riverkeeper came to the last work group meeting and gave an update on the LID outreach work they have completed. She gave the presentation to five groups and also visited twenty-two businesses to give out handouts on preventing PCBs. The Spokane River Forum rescheduled the social media meeting planned for earlier this month. The work group is working on condensing the one-page fact sheet into a smaller version and will review it next month. The work group is planning to meet the second Tuesday of each month at 10 AM. But next month the meeting will be on the first Tuesday, November 6. The group also developed a preliminary draft action plan for outreach to schools, households and businesses, along with strategies for communications with the public. The group would like to get flyers in utility billings as well as having radio spots, TV commercials, billboards and are also considering proposing having a speaker's bureau and briefings to service clubs, etc. Toni Taylor has put a couple of River Forum videos on the spokaneriverPCBfree.org webpage. BiJay Adams asked to be included on the work group and invited to the next meeting.

Questions/Comments:

- Did the Education work group look at the Riverkeeper flyer before it went out? I had a question about something that is stated in it. *This flyer was not reviewed; we received it after it had been distributed.*
- If Task Force funding is being used then it is important to approve content before communications occur. At a meeting earlier this year, a draft low-impact development presentation was shared and the Task Force provided guidance on updates to be made to it before it was used. (*From review of past meeting agendas and notes, the LID presentation was brought before the Task Force for approval but the one-page flyer was not discussed*).

Fish Sampling: Lisa Dally Wilson, Dally Environmental provided this update for Chris Donley,WDFW and work group lead - The work group has two objectives: one is to design a study (data/models) that will further understanding of what is causing the PCB concentrations in fish that being observed in the river. This includes determining the source(s) and avenues of exposure so that the Task Force can focus future efforts on controls that will likely lead to a reduction in concentrations of PCBs in fish tissue. A year ago the group discussed using biofilm results in the Arnot and Gobas model. This is the next step once these results are available from Ecology.

The second objective is to develop a yardstick to measure changes in fish tissue concentrations over time and collect adequate baseline data to detect measurable changes. The plan is to schedule another Fish Sampling Work Group meeting before the end of the year.

Mass Balance and Groundwater: Bud Leber – This update was covered earlier in the meeting.

TSCA: Doug Krapas – The work group last met on October 3. David Darling from ACA was there and it was good to have that organizational perspective. The Washington Department of Enterprise Services used yellow pigment paint as a beta test for their purchasing policy and had four suppliers participate. The new policy excludes use of certain yellows. Out of four they had

three successful vendors. HP has adopted the policy of an inadvertent PCB threshold of 0.1 ppm along with Apple.

The Task Force received a letter from EPA regarding concerns expressed by the Task Force in a letter sent earlier this year. There was good feedback in the letter from EPA Region X Administrator, Chris Hladick. The Task Force should take a closer look at this letter at our next meeting. The EPA letter said they had developed an inventory of references on inadvertent PCBs that was shared with the Green Chemistry Work Group. The letter is on the Task Force website, along with the list of inadvertent PCB references.

Lucy Edmondson noted that EPA has taken a hard look at the letter and areas the agency could look at more thoroughly. EPA has a lot promising research going on with an internal group organized to continue looking at these issues (Michelle Mullin leading). EPA is also evaluating what else can be done. EPA will continue to invite Task Force input as the work progresses, so more follow up is expected in the future.

Doug commented he will provide recommendations for additional follow up on the EPA letter after further discussion at the next TSCA Work Group meeting.

Lisa noted the TSCA Workgroup is continuing to develop plans for a workshop to bring stakeholders to the table to address inadvertent PCBs in inks and pigments. The work group will prepare an overview of the workshop for review and use the Task Force to shape content. Lisa had a call with the ACA to discuss the workshop at their request. The ACA provided ideas for workshop content but also had some concerns about the workshop and what it would mean for them. Doug stated this process is all about collaboration and bringing everyone to the table.

Funding: Karl Rains – The next work group meeting will be December 5. The intent of the meeting is to look at grant funding sources that may be worth pursuing.

MOA/Task Force Orientation Summary:

Ben Floyd presented an updated summary MOA and Task Force orientation document describing what the Task Force is about, the Comprehensive plan and planned next steps. Please review it and provide input on how this can be used.

Comments by Task Force:

- Under the background there should be some indication of invited entities and continue to extend invitation and acknowledge other groups
- There should be a small section of what the Task Force addresses and doesn't address. The Task Force doesn't address or make decisions regarding permittees and permit requirements.
- The Task Force decided the addendum with the bullets should be deleted.
- For new members we should mention it's not representative of the whole MOA, it doesn't have all detail.

ACTION: Members of the Task Force give White Bluffs Consulting comments on the summary by November 30 and WBC will send out a reminder on Monday, November 26.

SRRTTF Preliminary Outline of 2018 Implementation Summary:

Ben Floyd - Annually the Task Force is to prepare and submit to Ecology a summary of accomplishments in implementing the Comprehensive Plan. Last year was the first time a summary was developed, for the 2017 calendar year. The 2017 summary primarily relied on Table 11 in the plan, with status reports on the activities listed in this table along with a summary of the public outreach activities that individual dischargers had completed. There was also a facilitator's report that covered every action done in 2017. What do you think our 2018 summary should look like?

- I believe Kara put a tab on the website of Task Force meeting accomplishments.
- This table is helpful as to what was accomplished. There are a number of other things that aren't on the table but need to be included. A lot of work is not identified but included in the comprehensive plan under other studies, and these should be added to the summary.
- With the Task Force moving more into work group activities there is data that could be referenced with the summary.
- This table design format may work well for listing the work group activities completed and referencing data.
- A measurable progress review was done in 2015 and continues every five years. Doing this yearly will make the five year review easier.

ACTION: WBC to work with the Technical Track Work Group to develop a detailed outline and then report for the Task Force, with a final summary to be completed by the February or April 2019 meetings.

SRRTTF Preliminary Discussion of 2019 Planned Actions and Process for Establishing Future Priorities and Actions:

Ben Floyd – A draft schedule of work group activities was distributed. This is a draft to identify all the work groups, their activities and the timing of these activities going forward. This schedule is a starting point and the facilitation team hopes to work with the leads to update this schedule, and identify future activities for Task Force consideration. The plan is to have this updated by spring of 2019, before the end of the state biennium.

Comments/Questions:

- Available funding and actions in the comprehensive plan will help to determine this schedule. Complete this schedule after the legislative session to see what funds are available plus funding we might receive from grants. Ask the work group leads to get these up to date and provide feedback.
- Identifying where these activities fall under the Comprehensive Plan would be good to include or identify. There is a way to frame these up to secure additional funding.
- How do we scope beyond 2019 and does the whole Task Force work on this or the work group leads?
- The Techical Track work group did this previously but now most tasks fall under the work groups. Do we want to assign the Technical Track work group to do this?

- The Comprehensive Plan has a timeline but what is next? Are there additional items showing up on the timeline that the Task Force should be executing? Look at the Comprehensive Plan again.
- The implementation summary is only one we put timelines on.
- There is the big assessment due at the five year mark.
- Can a Technical Track work group meeting be scheduled in November or another time later this year to discuss this?
- Have Dave Dilks and WBC work together to lay out an agenda and schedule after looking at the Comprehensive Plan

ACTION: Have WBC look into a date and schedule the Ecology office for a Technical Track work group meeting, review the Comprehensive Plan and work with Dave Dilks and Bud on an agenda and schedule for this work group to help develop the updated schedule and set of activities for the Task Force to consider.

Press Inquiries, Events, Funding, other Announcements:

Ben received a call from High Country News about doing an interview about what the Task Force is doing. How does the Task Force handle these inquiries?

- The Task Force has participated in editorials as a group for the Spokesman Review before. Several people volunteered before with a variety of groups represented. All were interviewed together at the same time.
- Ask for specific questions ahead of time.
- Who would like to be involved*? Doug Krapas, Mike Peterson, Ecology, City of Spokane, Idaho representative, Mike LaScoula, Tom Agnew*

ACTION: Have WBC follow up with High Country News and request specific questions. Then schedule a time where a panel from the Task Force can be interviewed. The panel would include Doug Krapas, Mike Peterson, Ecology (Karl and/or Adriane), City of Spokane, Idaho representative, Mike LaScoula and Tom Agnew.

Upcoming meeting topics and Task Force meetings:

Adriane wondered if the Task Force wants to sponsor an AKART workshop? Doug replied that the Task Force should not be the conduit for an AKART workshop due to the delineation in the MOA to keep the Task Force out of the NPDES permitting process.

The Task Force agreed on the following upcoming meeting topic adjustments:

- Add the TSCA Stakeholder Workshop discussion to December agenda
- Add 2018 Implementation summary for discussion on December agenda
- Add EPA letter discussion on the December agenda
- Delete the AKART technology workshop plan update from the February agenda topics
- Add 2019-2021 Funding plan for State Legislative funding for April and June agendas

The next SRRTTF meeting is December 12, 2018 at Liberty Lake Sewer & Water District, 8:30 am – 12 pm