SRRTTF: Comprehensive Plan Implementation Summary Tables (3)
Year Two, 1/1/2018–12/31/2018
Actions Compiled from SRRTTF Comprehensive Plan (FINAL DRAFT February 27, 2019)

Table 1 – Category A Control Actions

Category (Plan Section)	Control Action	Lead Group	Status 12/31/2018
A: Wastewater Treatment (5.1)	5.1.1 Maintain compliance with Idaho Municipal Permits	Permit holders	In compliance with permits Next Steps: Permittees continue to work with regulators on permit compliance and any associated updated requirements
	5.1.2 Maintain compliance with Washington Municipal Permits		
	5.1.3 Maintain compliance with Washington Industrial Permits		
	5.1.4 Maintain compliance with Fish Hatchery/Aquaculture Permits		
A: Remediate Known Contaminated Sites (5.2) ***(see also 6.3 below)***	5.2.1 Maintain remediation remedy for Spokane River Upriver Dam and Donkey Island	Ecology	The remedial actions and monitoring in 2008 and 2010 were completed by Avista under the terms of the consent decree. The last Ecology Periodic Review for this site was completed in 2016. Next Steps: The next 5-year Ecology Periodic Review for the Spokane River Upriver Dam and Donkey Island Site is scheduled for 2021
	5.2.2 Maintain protections for General Electric site near Spokane River	Ecology	The last 5-year Ecology Periodic Review for the General Electric Co. Site located at 4323 E. Mission Ave was in 2013. One well measured 0.21 ug/l. Cleanup levels are 500 times larger than current PCB water quality criterion Next Steps: The next Ecology review would have occurred in 2018, however it appears that schedule will not be met. It should occur sometime in 2019.

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	5.2.3 Maintain protections for the City Parcel	Ecology	Periodic Ecology Reviews for the City Parcel Site have not yet begun. The 5-year clock will likely start when the City of Spokane successfully implements the required institutional controls (environmental covenant) for the portions of the Site they own.
	5.2.4 Complete PCB groundwater treatment pilot for Kaiser Aluminum	Kaiser Aluminum	Continued pilot testing operations and investigating filter backwash treatment technologies Next Steps: Evaluate additional filter backwash treatment technologies
	5.2.5 Schedule and Monitoring Program	Nothing specified – Plan references in Section 6.1 broader implementation effectiveness assessment within five years to review all available data to assess: 1) PCB loading to the Spokane River and changes in loading, and 2) Spokane River PCB concentrations and changes in concentrations	
A: Stormwater Controls (5.3)	5.3.1 NPDES Stormwater Permits for MS4s	Permit holders	In compliance with permits
	5.3.2 Implement 3 actions that reduce PCBs in the City of Spokane's Integrated Clean Water Plan	City of Spokane	Cochran Basin: Small infiltration facility built with I03 storage tank project. Ecology grants have been received for Disc Golf and TJ Meenach infiltration basins. Still seeking funding for piping/conveyance. Green Infrastructure: City continues to include green infrastructure in its construction projects and encourage its use on private development. CSOs: All CSO facilities are either complete or under construction except CSO 33c tank (expected to go out for bid soon). Majority of CSO facilities expected to be operational in 2019.
A: Low Impact Development Ordinance (5.4)	Encourage use of LID stormwater practices	Cities and Counties	City of Spokane: Ordinance/incentives still in place and being used.
A: Street Sweeping (5.5)	Continue street sweeping efforts	Cities and Counties	City of Spokane: Strategic street sweeping still being performed.

Table 2 – Control Actions Coordinated by SRRTTF

Category	Control Action	Lead Group	Status 12/31/2018
A: Purchasing Standards (5.6)	Implement State and local purchasing and procurement policies	State agencies, Cities and Counties. TSCA Work Group (WG)	Letter sent to WA and ID state and local agencies encouraging them to use non-chlorinated road paints. Spokane, Spokane County, Liberty Lake and Post Falls to use non-diarylide yellow paint.
B: Support of Green Chemistry Alternatives (5.7)	5.7.2 Provide guidance & feedback to Ecology on Green Chemistry efforts	Green Chemistry WG with support from TSCA WG	Phase 1 Memo approved on Oct 22, 2018 Next Steps: Phase 2 deliverables on track to be implemented by June 30, 2019: • Paper packaging work plan • Prepare list of stakeholders • Options for no/low paper packaging • Research procurement specifications • TSCA workshop to address inadvertent PCBs found in pigments • Draft/final report Future activities TBD
	5.7.2 Assist Ecology in contacting other parties about existing or future Green Chemistry efforts		
B: PCB Product Testing (5.8) (Short Term Action)	5.8.2 Provide comments on the PCB product testing report	Full Task Force	Ecology conducted Fish Hatchery products study and report expected in early 2019. Next Steps: The Fish Hatchery Products report is still in progress expected to be completed by spring 2019. Ecology still in the process of finalizing the data for the other product categories (janitorial supplies, lubricants, etc.) with the data validator. This data finalization will extend into February with reports to follow later in 2019.
	5.8.2 Provide input to Ecology in support of its efforts towards development of a clearinghouse	Green Chemistry WG and Ecology, with support from other agencies	Work continues on this action. Multiple efforts for product testing have occurred by Ecology, EPA, City of Spokane and others, along with Ecology database updates, and EPA and other literature reviews. Next Steps: The Green Chemistry Workgroup continues to coordinate efforts to prepare Task Force recommendations to Ecology on clearinghouse development, integrating multiple product testing efforts, and providing guidance on future product testing.
	5.8.2 Provide public education on PCB containing products	Education and Outreach (E&O) WG	Complete: E&O WG built and updated PCB website, prepared and presented LID presentation, and partnered with Spokane River Forum on outreach campaign Next Steps: PCB flyer for utility billings in 2019; construction/remodeling industry direct mailer; targeted communications with River Forum Spring Campaign; develop school curriculum and maintain and update website

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B: Waste Disposal Assistance (5.9)	5.9.2 Provide recommendation to organizations on how to better control PCB waste 5.9.2 Raise public awareness on how to identify and dispose of PCB containing items	E&O WG	Complete: Developed BMPs handout for reducing PCBs in runoff associated with demolition and remodeling projects, Contract with Spokane River Forum in place through 2018 which included got Waste Wednesdays, holding two workshops with communication specialists to identify more effective outreach strategies, 146 Local Source Control visits by SRHD to distribute the County's PCB handout and Waste Directory bookmarks, drafting general PCB hand out, and building and updating PCB Free website Next Steps: Continue Got Waste Wednesdays with Spokane River Forum and developing Spring 2019 Campaign proposal using social media, finalizing general PCB handout and distributing to target audiences, further refinements to PCB Free website and other outreach activities. Note: The WA Department of Health will also be updating the fish advisory for the Spokane River in 2019
B: Regulatory Rulemaking (5.10)	5.10.2 Seek to attain State/federal level changes to color box requirements for road paints	TSCA WG	Letter sent to WA and ID state and local agencies encouraging them to use non-chlorinated road paints. Spokane, Spokane County, Liberty Lake and Post Falls to use non-diarylide yellow paint. Next Steps: Continue to encourage other organizations to adopt non-chlorinated road paints. Design and implement a TSCA pigment manufacturer's workshop to identify ways to reduce PCBs in paint pigments.
B: Compliance with PCB Regulations (5.11) (Short term action)	5.11.2 Review Ecology's atmospheric deposition study results	Technical Track WG	Draft report was provided to the Task Force and comments were addressed in the Final Report, which Ecology is expected to release early in 2019.
	5.11.2 Support agencies on regulatory revisions that are driven by Ecology's atmospheric deposition study	TSCA WG or full Task Force as appropriate	No specific actions were completed for this part of the action. Consider follow up on atmospheric deposition study findings and determine if the fingerprinting is indicating specific patterns and outline appropriate next steps, as applicable.
B: Emerging End of Pipe Stormwater Technologies (5.12) (Short term action)	5.12.2 Review of Phase 1 results	Technical Track WG	Complete: SRRTTF reviewed report, provided comments (12/2017 -01/2018). Findings resulted in statistical decrease in PCB congeners, particularly those containing ortho-chlorines. Overall PCB levels did not significantly decrease, possibly indicating high number congeners broke down into lower number congeners.
	5.12.2 Support Phase 2 if Phase 1 results warrant	Technical Track WG	In process: SRRTTF decided 1/24/18 to allocate $15,000 in support of Phase 2, a study to advance work on developing a process where fungi can be successfully used to break down PCB's in vactor waste and contaminated sites. Next Steps: Work continues with the Lands Council and the North Central High School teachers and students on Phase 2 work, which is expected to continue in 2019.

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C: Building Demolition & Renovation Control (5.13)	5.13.1 Adapt SFEP document for use as guidance for Spokane-area bldg. contractors	Building & Demolition WG	Complete: Brochure and flier completed and distributed within the basin
	5.13.1 Work with local gov. agencies to ensure document distributed as part of all permits		
C: Identify Sites of Concern for Contaminated Groundwater (5.14)	Mine existing data to assess the potential new groundwater sites contributing to PCBs	Groundwater PCB Upgradient WG	Complete: Technical Memo approved by Task Force on October 24, 2018 Next Steps: Determine future work scope after reviewing 2018 sampling efforts (river/sediment/periphyton)
	Consult with Ecology TCP staff	Groundwater PCB Upgradient WG	TCP staff fully briefed on status and findings
	Determine next action	Groundwater PCB Upgradient WG	Potential next steps identified but no recommendations until 2018 sampling effort results available and evaluated
Studies to Address Data Gaps (6.3)	Characterizing sediment sources	SRRTTF and Fish Sampling WG	Waiting on synoptic data and biofilm study results, and congener fingerprinting, and integrating this information Next Steps: Analyze 2018 data and share findings, and identify next steps
	How PCBs contribute to fish tissue contamination – source identification	Fish Sampling WG	Waiting on synoptic data and biofilm study results, and congener fingerprinting, and integrating this information Next Steps: Analyze 2018 data and share findings, and identify next steps. Fall 2019 work group meeting to scope study and approach for fish tissue "yardstick" process tentatively planned once 2018 reports have been made available and have been evaluated. Work on developing QAPP elements could occur before workshop.

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Studies to Address Data Gaps continued (6.3)	PCB Mass Balance and Congeners/ homologue patterns	PCB Mass Balance WG	Synoptic sampling (ambient/point source/sediment/periphyton) conducted in 2018 Next Steps: Analysis of 2018 sampling data and identification of potential next steps
	Database Management	Data Management WG	Database set up in 2018 along with protocols and approach for maintaining Next Steps: Input 2018 data, update, track and monitor use
	Positive Matrix Factorization (PMF) analysis	PMF Analysis WG	Approach established and Phase I analysis mostly completed Next Steps: Complete Phase 2 analysis and share results, and identify next steps

Table 3 – Additional Potential Control Actions

Category	Control Action	Lead Group	Status 12/31/2018
Additional Control Actions (6.2)	6.2.1 Education on Septic Disposal	TBD	Nothing has been completed on this control action
	6.2.2 Survey Schools and Public Buildings	TBD	TBD
	6.2.3 Accelerated School Construction	TBD	TBD
	6.2.4 Emerging Wastewater Technology	TBD	TBD
	6.2.5 Survey of Local Electrical Equipment	Avista and other utilities	Since 2016, Avista has completed its transformer change out program within the Spokane River Watershed. All detectable PCBs have been removed (EPA method 8082) from the distribution infrastructure within the Spokane River Watershed. Avista currently performs regularly scheduled surveys and maintains a database of all transformers within its' service territory as part of its normal operation and maintenance.
	6.2.6 Leak Detection/prevention in Electrical Equipment	TBD	TBD
	6.2.7 Regulation of Waste Disposal	TBD	TBD
	6.2.8 Stormwater Source Tracing	TBD	TBD

Category	Control Action	Lead Group	Status 12/31/2018
Additional Control Actions continued (6.2)	6.2.9 Removal of Carp from Lake Spokane	Avista	Avista initiated a carp removal pilot study as part of its investigation into methods of addressing non-point sources of phosphorus. The objective is to improve dissolved oxygen levels in Lake Spokane in accordance with the Spokane River and Lake Spokane Dissolved Oxygen Total Maximum Daily Load (Ecology 2010) and Avista's Lake Spokane Dissolved Oxygen Water Quality Attainment Plan (Avista and Golder 2012). During 2017 and 2018 a total of 7,028 Kg of carp were removed representing approximately 52 Kg of Total Phosphorus. Next Steps: Additional carp removal planned for 2019.
	6.2.10 PCB Identification during Inspections	TBD	TBD
	6.2.11 Compliance with PCB Regulations	TBD	TBD