

Measurable Progress

Process, Analysis and Schedule

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Accountability

Washington NPDES permits state that **if Ecology determines** that the SRRTTF is failing to make **measurable progress** toward meeting applicable WQ criteria for PCBs, Ecology would be obligated to proceed with the development of a TMDL or alternative

Measurable Progress reflects the success of the SRRTTF towards reducing PCBs in the Spokane River and towards achieving applicable WQ criteria for PCBs



Definition Review

Measurable Progress evaluates the status of three key metrics

Inputs: organizing activities

Outputs: activities and work products

Outcomes: progress toward achievement of the applicable WQ criteria for PCBs in the Spokane River

- Achievement of the applicable WQ standards
- Achievement of health standards
- Measured reductions of toxics to or in the Spokane River



Measurable Progress Evaluation Process



GOAL:

Demonstrate compliance w/ applicable WQS for PCBs



INPUTS:

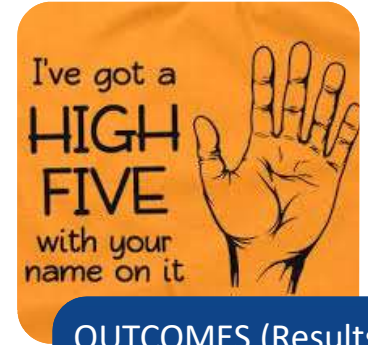
SRRTTF continues...

- to work collaboratively
- forward momentum and progress



OUTPUTS (Actions):

- Makes decisions & recommendations
- Prepares meaningful work products
- Identifies/implements source reduction & BMPs



OUTCOMES (Results):

- Progress towards WQ criteria
- Measurable real or potential reductions of PCBs to the SR
- Compliance w/ permit conditions



NO

Regulatory action by Ecology

NO



Content of the Review

- **Criteria** related to inputs, outputs, and outcomes in Attachment A
- Use **existing data** from SRRTTF and from permit submittals
- **Supplemental data** will be considered and subject to acceptance
 - Quality assured
 - And/or documented



Defensible Data

- SRRTTF minutes, attendance sheets, points of decision, etc.
- Outputs of the SRRTTF demonstrating completion of specified criteria
 - Work plans, status reports, outreach activities, etc.
- Reports and studies completed under an approved QAPP
- Information submitted under permit requirement
 - Toxics Management Plan, analytical data
- Other defensible evidence with supporting documentation
 - Clean ups, studies, source reductions, BMPs, Avista data, etc.



Assessment

Three fundamental criteria

- 1) Is the SRRTTF **still working together** in a collaborative manner?
- 2) Is the SRRTTF still moving forward on activities that will lead to:
 - Identification of sources of PCBs
 - Reduction of PCBs in the river (water column and/or fish tissue)
 - Development of BMPs
 - A comprehensive plan for progress toward achieving applicable WQ criteria for PCBs
- 3) Is there **environmental evidence** that progress is being made towards achieving applicable WQ criteria for PCBs in the Spokane River?



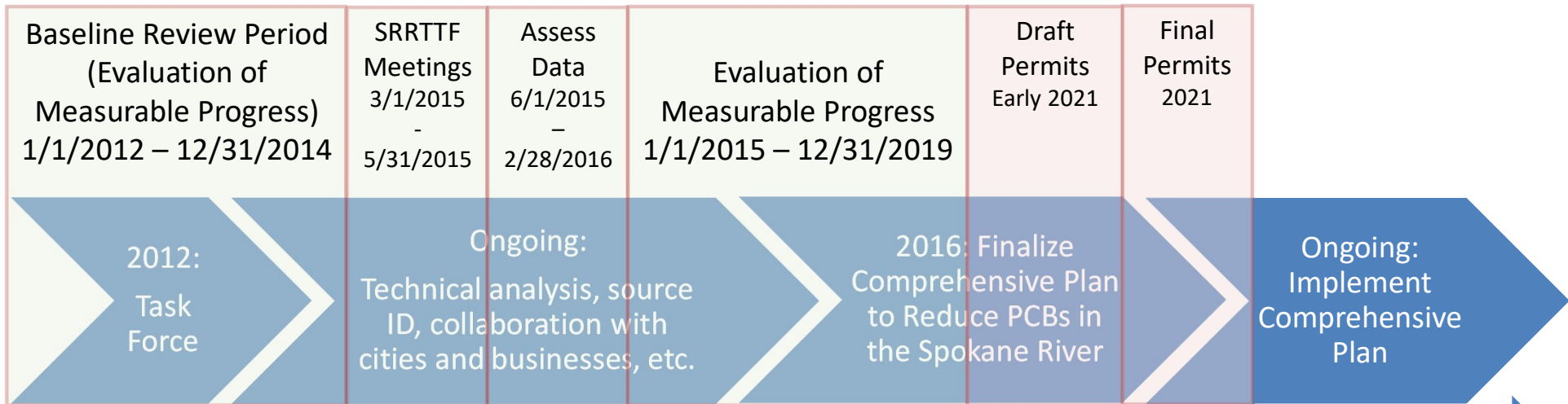
Demonstration of Measurable Progress

The following conditions, **when accompanied by defensible data**, will be considered a demonstration of measurable progress:

- Compliance with applicable WQ standards for PCBs
- Evidence that the SRRTTF is functioning in a collaborative manner and continuing to engage in activities that will lead to the reduction of PCBs in the river
- Development and **implementation** of a comprehensive Spokane River toxics reduction plan
- Actions that eliminate, remove, or isolate PCBs from the river or watershed
- Environmental trends showing a decrease of PCBs in the river, sediments, or biota



SRRTTF Schedule



On-going PCB reductions of known sources: catch basin cleaning, street sweeping, treatment facility upgrades, community education, etc.



Potential Outcomes

- **The Spokane River meets WQS?** – Task done, celebrate!!
- SRRTTF is **working well together** and **moving towards the goal?** – Measurable Progress is evident
- SRRTTF is **working well together** and **environmental outcomes not evident?** – Review with the SRRTTF and permittees, identify adaptive management measures
- SRRTTF is **not working, not meeting nor creating meaningful work products?** – Ecology is obligated to proceed with a TMDL or alternative

