TTWG Data Synthesis Workshop
Management-Related Questions

The Tech Track work group is recommending holding a Mini Data Synthesis Workshop in 2022. To prepare for the workshop the technical team has identified the following questions for Task Force consideration. In developing these questions, the high-level management questions identified at the 2019 Data Synthesis workshop were determined to still be relevant along with other questions:

Management-Related Questions

- Characterize Sources
  - What are the ultimate sources of PCBs to the system (inadvertent/legacy/other)?
  - How much PCB is coming from each delivery pathway?
- Identify and Implement Appropriate Actions
  - How are fish obtaining their PCBs?
  - How controllable are the various sources?
- Measurable Progress
  - How much PCB is in the river (and sediments and fish) now?
  - How do we identify future trends in PCB concentration?

A couple of new additional management questions to consider are:

- Do we expand the scope of our assessment downstream of Nine Mile Dam, and include major tributaries?
- Do we need to start considering pollutants other than PCBs?

Additional guidance to consider when answering these questions include the following as provided WA State Department of Ecology:

Characterize Sources

- Known sources should be clearly identified in terms of both total load and concentrations. By demonstrating how much we already know, we can then focus on the largest areas of unknown loading and/or concentrations.

Identify and Implement Appropriate Actions

- There should be less focus on how fish obtain PCBs, unless there is a clear connection as to how that understanding can lead to source identification and removal. The water quality standard is for water column concentrations and that should be the focus until such time that the river is meeting the standard, but we are still seeing fish tissue concentrations that warrant fish consumption advisories. Although we are moving in the right direction, we still have work to do.

Measurable Progress

- More robust synoptic sampling should occur to increase data points for mass loading in reaches where analysis can only be made based on limited or a single data point.

Additional suggestions/recommendations

- Make contact with EPA to see if/how this workshop can establish a foundation of cooperation as EPA advances efforts on the PCB TMDL; and if that influences the direction of future SRRTTF activities. If there is support for that, here are some resources for future consideration:
    - https://www.epa.gov/tmdl/overview-total-maximum-daily-loads-tmdls
    - EPA issued review guidelines for TMDL submissions in Guidelines for Reviewing TMDLs under Existing Regulations Issued in 1992. Below is a TMDL Review Checklist with the minimum recommended elements that should be present in a TMDL document.
        - Identification of Waterbody, Pollutant of Concern, Pollutant Sources and Priority Ranking.
        - Applicable WQS and Numeric Water Quality Target.*
        - Loading Capacity.*
        - Load Allocations and Waste Load Allocations.*
        - Margin of Safety.*
        - Consideration of Seasonal Variation.*
        - Reasonable Assurance for PS/NPS.
        - Monitoring Plan to Track TMDL Effectiveness.
        - Implementation Plan.
        - Public Participation.

*Required by 40 C.F.R. Part 130