Confirmation of Control Actions for Inclusion in Comprehensive Plan

SRRTTF Meeting
Dave Dilks
August 24, 2016
Comp. Plan Development Process

• High Level Summary Provided Today
  – Confirmation of Workshop Recommendations
  – Initial Discussion of Implementation Details
    • Milestones and timelines
    • Effectiveness monitoring

• First Draft of Plan Issued Mid-September
  – Open sharing of review comments
  – Consensus-based final product
Recap of Workshop Recommendations

• 27 categories of Control Actions evaluated
• Workshop assigned each Control Action to one of five categories
  A. Existing Action: Maintain existing efforts
  B. Existing Action: Maintain and enhance
  C. New Action: Commit to implement in Plan
  D. New Action: Worth consideration in future
  E. Do Not Pursue Further
**Category A Control Actions**

**Maintain Current Activities**

<table>
<thead>
<tr>
<th>Control Action</th>
<th>Existing Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wastewater Treatment</td>
<td>• Spelled out in NPDES permits</td>
</tr>
<tr>
<td>Remediate Known Contaminated Sites</td>
<td>• Assessment of remediated sites</td>
</tr>
<tr>
<td></td>
<td>– Upriver Dam and Donkey Island</td>
</tr>
<tr>
<td></td>
<td>– City Parcel, General Electric sites</td>
</tr>
<tr>
<td></td>
<td>• Ongoing Kaiser remediation</td>
</tr>
<tr>
<td>Stormwater Controls</td>
<td>• City’s Integrated Clean Water Plan</td>
</tr>
<tr>
<td></td>
<td>• MS4 permits for other municipalities</td>
</tr>
</tbody>
</table>
# Category A Control Actions (cont.)

## Maintain Current Activities

<table>
<thead>
<tr>
<th>Control Action</th>
<th>Existing Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Impact Development Ordinance</td>
<td>• City’s ordinance</td>
</tr>
<tr>
<td>Street Sweeping</td>
<td>• Currently being conducted in several communities</td>
</tr>
<tr>
<td>Purchasing Standards</td>
<td>• Regulations in Washington, Spokane City and County</td>
</tr>
</tbody>
</table>
## Category B Control Actions
**Maintain and Enhance Current Activities**

<table>
<thead>
<tr>
<th>Control Action</th>
<th>Existing Activities</th>
<th>Additional Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support Green Chemistry</td>
<td>Ongoing Ecology program</td>
<td>• Provide guidance and feedback to Ecology</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Reach out to other parties</td>
</tr>
<tr>
<td></td>
<td></td>
<td>‒ EPA, Universities</td>
</tr>
<tr>
<td>PCB Product Testing Information</td>
<td>Ongoing testing of products</td>
<td>• Build (or support?) a centralized clearinghouse</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Public education on products containing PCBs</td>
</tr>
</tbody>
</table>
## Category B Control Actions
Maintain and Enhance Current Activities

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<tr>
<th>Control Action</th>
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<th>Additional Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Disposal Assistance</td>
<td>Assistance provided via other parties (e.g. Spokane River Forum Waste Directory)</td>
<td>• Raise awareness on how to identify and dispose of PCB-containing items  &lt;br&gt; • Make recommendations to organizations as to how they can help achieve goals</td>
</tr>
</tbody>
</table>
# Category B Control Actions

## Maintain and Enhance Current Activities

<table>
<thead>
<tr>
<th>Control Action</th>
<th>Existing Activities</th>
<th>Additional Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulatory Rulemaking</td>
<td>Dialogue/letters with EPA and legislators on TSCA reform</td>
<td>• Advocate for State/Federal-level changes to color box requirements for road paints</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Investigate what would it take to partner with manufacturers</td>
</tr>
<tr>
<td>Compliance with PCB Regulations</td>
<td>Comments on:</td>
<td>• Review results of atmospheric deposition study to assess need for regulatory control of oil burning</td>
</tr>
<tr>
<td></td>
<td>• NPDES/CWA compliance/permits</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• 303(d) lists</td>
<td></td>
</tr>
</tbody>
</table>
## Category B Control Actions

Maintain and Enhance Current Activities

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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Emerging End of Pipe Stormwater</td>
<td>Lands Council Research Supported by City of Spokane</td>
<td>• Identify/support additional research projects that meet Task Force goals</td>
</tr>
<tr>
<td>Technologies</td>
<td></td>
<td>– Either direct funding or grant support</td>
</tr>
</tbody>
</table>
## Category C Control Actions

### New Activities

<table>
<thead>
<tr>
<th>Control Action</th>
<th>Activities</th>
</tr>
</thead>
</table>
| Identification of New Sites of Concern for Contaminated Groundwater | • Mine existing data  
• Package information for, and consult with, TCP  
• Determine next actions (e.g. targeted monitoring) |
| Building Demolition and Renovation Control          | • Obtain and adapt SFEI tool kit for testing building materials prior to demolition permit issuance (add tool kit to permit)  
• Encourage regulations/ordinances requiring management of PCB-containing materials during demolition and renovation |
Category D Control Actions
Consider for Future Implementation

- Education on Septic Disposal
- Survey Schools & Public Buildings
- Accelerated Sewer Construction
- Emerging Wastewater Technology
- Survey Electrical Equipment
- Leak Prevention/Detection
- Regulation of Waste Disposal
- Stormwater Source Tracing
- Removal of Carp from Lake Spokane
- PCB Identification during Inspections
- Compliance with PCB Regulations for Imported Products
Category E Control Actions
Do Not Pursue Further

- Expanded Leaf Removal
- PCB Product Labeling Law
- Education on Filtering Postconsumer Paper
Implementation Details

• Confirm ownership of new activities
• Define milestones, timelines, effectiveness monitoring
  – Annual status report assessing effectiveness of Comprehensive Plan implementation
  – Need capacity for public outreach effectiveness monitoring
Category A Control Actions

• **Actions**
  – Maintain current activities

• **Owner**
  – Already defined

• **Timelines and milestones**
  – Defined in existing permits/programs

• **Effectiveness monitoring**
  – Assessed via Ecology’s long-term monitoring program for the Spokane River
Category B Control Actions
Support Green Chemistry

• Actions
  – Provide guidance and feedback to Ecology, others

• Owner
  – SRRTTF members

• Timeline, Milestones
  – Ongoing, annual assessment

• Effectiveness monitoring
  – Has guidance been provided?
  – Has measurable progress been made?
Category B Control Actions

PCB Product Testing Info

• **Actions**
  – Build (or support development of) a centralized clearinghouse
  – Public education on products containing PCBs

• **Owner**
  – SRRTTF members

• **Timelines, milestones**
  – Clearinghouse developed with two years
  – Ongoing, annual assessment of education

• **Effectiveness monitoring**
  – Has a clearinghouse been established?
  – Has public education led to a behavior change?
Category B Control Actions
Waste Disposal Assistance

• Actions
  – Raise awareness on how to identify and dispose of PCB-containing items
  – Make recommendation to implementing organizations

• Owner
  – SRRTTF outreach group

• Timelines, milestones
  – Ongoing, annual assessment

• Effectiveness monitoring
  – Public outreach effectiveness monitoring
Category B Control Actions
Regulatory Rulemaking

• **Actions**
  – Dialogue/letters with EPA and legislators on TSCA reform
  – State/Federal level changes to "color box" requirements for road paints

• **Owner:** SRRTTF members (WDOT-leadership on color box?)

• **Timelines, milestones**
  – Ongoing, annual assessment

• **Effectiveness monitoring**
  – Evidence of changed regulations
Category B Control Actions

Compliance with PCB Regulations

• **Actions**
  – Comment on NPDES/CWA compliance/permits, 303(d) listings
  – Review results of atmospheric deposition study to assess need for regulatory control of oil burning

• **Owner**
  – SRRTTF members

• **Timelines, milestones**
  – Comments ongoing, annual assessment
  – Review of atmospheric study within one year of report

• **Effectiveness monitoring**
  – None
Category B Control Actions
Emerging End of Pipe Stormwater Technologies

• Actions
  – Identify/support additional research projects that meet Task Force goals

• Owner
  – SRRTTF

• Timelines, milestones
  – Identify next steps within one year of Phase 1 completion

• Effectiveness monitoring
  – None
Category C Control Actions

I.d. new contaminated sites of concern for g.w.

• Actions
  – Mine existing data
  – Package information for and consult with TCP
  – Determine next action (e.g. targeted monitoring)

• Owner
  – SRRTTF TTWG and Technical Consultant, TCP, EAP

• Timelines, milestones
  – Assessment in one year, identify future milestone in report

• Effectiveness monitoring
  – Remedy (if needed) identified
  – Long term river monitoring
Category C Control Actions
Building Demolition/Renovation Control

• Actions
  – Obtain and adapt SFEI tool kit, distribute as part of permits
  – Encourage regulations/ordinances requiring management of PCB-containing materials during demolition and renovation

• Owner
  – SRRTTF outreach work group, local governments

• Timelines, milestones
  – Tool kit adapted within one year, distributed by second year

• Effectiveness monitoring
  – Is tool kit being distributed?
  – Is tool kit being utilized?
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