



Spokane County

Environmental Services
Kevin R. Cooke, P.E., Director

July 24, 2020

Marla Koberstein

Department of Ecology

Submitted online via Ecology Public Comment Form

Preliminary draft variance comments

PO Box 47696

Olympia, WA 98504-7696

Subject: Comments on preliminary draft Spokane River variance documents

Dear Ms. Koberstein,

Thank you for the opportunity to provide comments on the Department of Ecology's (Ecology's) preliminary draft documents defining variances for the discharge of polychlorinated biphenyls (PCBs) into the Spokane River. Spokane County owns the Spokane County Regional Water Reclamation Facility (SCRWRF) that provides state-of-the-art treatment of wastewater prior to discharge to the Spokane River. As one of the applicants for a variance, Spokane County appreciates Ecology taking the lead to find a realistic solution for this multi-decadal challenge of dealing with PCBs.

Additionally, Spokane County is aware of the general discussion of the use of variances for the discharge of PCBs to the Spokane River. Spokane County believes variances for the discharge of PCBs are an appropriate path forward for this community problem. This is the case whether the PCB human health water quality limit is 7 ppq or 170 ppq. There is no treatment technology currently available that can provide National Pollutant Discharge Elimination System (NPDES) permit holders with reasonable certainty that they will be able to consistently achieve compliance with an end-of-pipe PCB limit of 170 ppq (please see Spokane County Variance Application for detailed information of this statement). Variances, requiring dischargers to do the things that they can reasonably accomplish over time, are clearly the best approach, assuring progress towards a cleaner Spokane River without establishing permit limits that set the dischargers up for failure.

Please see Spokane County's specific comments on the several preliminary draft documents below:

Preliminary Draft Environmental Impact Statement

Spokane County concurs with Ecology's preferred alternative to issue individual discharge variances for PCBs in Spokane River. As the EIS notes, the preferred option allows for:

- The greatest environmental benefit;
- reductions in discharges of PCBs to the Spokane River;
- the continued evaluation of new treatment technologies; and
- reductions of PCBs in waste streams.

Preliminary Draft Rule Implementation Plan

Spokane County has no comments on this document at this time.

Preliminary Draft State Technical Support Document

1. Table 4: The annual average flow for the SCRWRF in 2019 was not 8.00 MGD.
 - a. Effluent flow from the SCRWRF in 2019 was approximately 7.91 MGD.
2. On page 23 it states, "Spokane County has identified several measures that could achieve additional PCB reductions", and "if one or more of these measures are shown to be effective, Spokane County will secure the necessary funding and design to implement the measure(s)."
 - a. While Spokane County is committed to implementing measures to reduce PCBs, the measures must be shown to be feasible at scale, both economically and technically, before they are implemented.
3. Page 23: "Spokane County requests a 20-year variance to complete the activities to reduce PCBs and comply with the PCB human health criterion."
 - a. Spokane County is not committing to meet the PCB human health criteria at the end of the 20-year variance period. PCBs are a long-term challenge and treatment technology may not exist at the expiration of the 20-year variance period. Spokane County is committed to working toward meeting the PCB human health water quality criteria during and following the variance term.
4. Page 27: The SCRWRF is located in the City of Spokane, not Spokane Valley.
5. Table 12 presents Spokane County PCB levels in influent and effluent from 2012 to 2019.
 - a. In accordance with our NPDES permit, samples collected for influent PCB analysis are collected at two influent trunk lines prior to their combination at the headworks. It appears that the concentration reported for each trunk line was simply added together for each sampling event.

- i. To develop the statistics reported in Table 12, a flow weighted average of the trunk lines for each sampling event should be used. Please recalculate the combined influent concentration.
6. Page 49: "...City of Spokane where surges in influent loading can occur due to their combined sewer systems, as well as their agreement with Spokane County and Airway Heights to treat their excess flows."
- a. Clarification: The County owns 10 MGD of treatment capacity at the RPWRF and sends wastewater flows daily from the County's North Spokane Interceptor to RPWRF.
7. Page 49 states "Ecology used statistical analysis to review the distribution of percent removal efficiencies for Spokane County's data. Data transformation and regression analysis was used to determine the 1st percentile of the data."
- a. Please include a full description of the statistical analysis including the review of the data set to determine the probability distribution function, assumed probability distribution, type of data transformation, specific statistical analysis, and software utilized to conduct the analysis.
8. Page 59 states "...the discharger will be required to conduct bench scale or pilot studies to determine the feasibility of implementing the technology at full-scale."
- a. It is not known what technologies may become available that will provide for more effective removal of PCBs. Spokane County will review the viability of new technologies as they emerge, which could then lead to pilot studies/testing.

Preliminary Draft Rule

1. Table 622 includes the following latitude and longitude for the Spokane County point of discharge: 47.67813/-117.36284.
 - a. It appears that this location is nearly one mile downstream (west) of the SCRWRF discharge point. We suggest using 47.67583/ -117.34694 as the SCRWRF discharge location.
2. WAC 173-201A-622(2)(b)(ii) states "Percent removal efficiency is calculated as the influent PCB concentration subtracted from the effluent concentration divided by the influent concentration."
 - a. It should be stated as: Percent removal efficiency is calculated as the effluent concentration subtracted from influent concentration divided by the influent concentration.

Ms. Koberstein
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Again, thank you for the opportunity to provide preliminary comments on these documents. Spokane County is committed to working with Ecology to improve water quality in the Spokane River. Please direct any questions on this letter to Rob Lindsay, Water Programs Manager, rlindsay@spokanecounty.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin R. Cooke".

Kevin R. Cooke, P.E.
Environmental Services Director

CC: File