



July 23, 2020

Marla Koberstein
Department of Ecology
Preliminary Draft Variance Comments
P.O. Box 47696
Olympia, WA 98504

Submitted via email to Marla.Koberstein@ecy.wa.gov

Re: Department of Ecology preliminary draft rulemaking for discharge-specific variances on the Spokane River.

Dear Ms. Koberstein:

On behalf of the City of Post Falls Idaho ("City"), I would like to thank you for the opportunity to provide feedback on the draft rulemaking for Washington discharge-specific variances on the Spokane River.

The City of Post Falls is committed to the fundamental goals of the Clean Water Act and improving water quality as a means of protecting public health and supporting a high quality of life for our communities. While not regulated by the Washington Department of Ecology, the City of Post Falls Water Reclamation Facility discharges to the Spokane River and thus has a shared interest in the river.

As you are aware water quality standards variances are a time-limited designated use criterion for a specific pollutant that reflects the highest attainable condition for a specific time period and from a specific source or for a specific water body. The City understands the preliminary draft rulemaking relates to variances for specific sources rather than the Spokane River water body however water quality, including upstream water quality, plays an important role in the development and analysis of source specific variances.

The City is aware of comments submitted to Ecology which purport water quality at the state line "far exceeds" any proposed standards for PCBs. The basis for this statement is not included with the comments and the City of Post Falls disagrees with this assertion.

The City completes required surface water sampling and reporting in conformance with IPDES Permit ID0025852. The Spokane River is sampled in Idaho for PCBs as part of the sampling

regimen with results showing a median of our downstream samples, those closest to the state line, less than 5 parts per quadrillion.

The City of Post Falls would appreciate a statement from the Washington Department of Ecology regarding their understanding of water quality relating to PCBs at the state line. The City would also appreciate being included as an interested party throughout future phases of this source specific variance development. The City will remain engaged in water quality discussions with our neighboring Washington stakeholders including our participation in the Spokane River Regional Toxics Task Force.

Thank you for your consideration of our comments. Please feel free to contact me with any questions.

Highest Regards,



Craig Borrenpohl, P.E., MPA
Utilities Manager

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