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PCB's have been investigated for many decades and Allowable concentrations have been developed based on impacts to Health, Microorganisms and the Environment.

These Chemicals are Carcinogenic and in Lower Concentrations have been found to effect Reproduction and other Systems of organisms.

The Current PCB standard is not protective. The proposed standard is one that does approach the protective level of the Environment. In light of the presence of PCB's in so many of the Products that are commercially available one must do what ever is reasonable to introduce controls when and where they can be most effective. Which is why I support the 7 parts per quadrillion standard the Ecology proposed.

As for the Dischargers to the Spokane Rivers request for a Variance This is something that should not be approved.

There are other ways to deal with discharges that do not meet standard. There are ways that a temporary waiver of the standard can be granted while the entity studies, reviews and designs a system to meet the standard. There are yearly extensions to the current permits that can allow the discharger to conduct business while all the while design and build facilities to me the standard.

Today there is NO discharger on the River who has completed their tertiary upgrades to meet the Phosphorus Standard. Without this initial Treatment how can Ecology and the Discharger evaluate additional PCB treatment needed?

I would suggest that ONLY After completion of the Tertiary treatment Facilities of a Discharger that an Evaluation of the effectiveness of that unit to remove PCBs be initiated.

Today it is too premature to allow a variance of a discharge BEFORE the effectiveness of Treatment for that discharge.

PCB's are such a problem in the Environment we must require Everyone who impacts It to do their fair share of cleanup.

The Users of the River are also the Rate Payers and the Consumers who pay for PCB removal. I'm sure that as users of the Spokane River they are supportive of additional cost to remove these pollutants when ever practical.

My Knowledge of the City of Spokane Facility is that it was undersized in it's design. It assumed during wet weather events the discharge of Settled Stormwater and Final Filter Effluent can be blended to meet the Total Phosphorus Standard. This short sightedness never considered the increase treatment capabilities of a larger Facility to also reduce PCB discharges during wet weather/high flow events.

Evaluation of this Facility Discharge needs to be done BEFORE issuing and variance to current

water quality standards.

Performing a Due Diligence Study of the Dischargers Facilities needs to take place Before issuing a Variances. And, All those impacted From Tribes and Users of the River to the Rate Payers funding improvements be identified.

The true cost and Impact must be evaluated