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ATT: Karl Rains,
Water Quality Planner,
Washington Department of Ecology, Eastern Regional Office
4601 N. Monroe, Spokane, WA 99205-1295

RE: Comments for Draft NPDES Permits for City of Spokane (# WA0024473)

Dear Mr. Rains,

The following comments are submitted on behalf of the Spokane Riverkeeper and the Upper Columbia Group of the Sierra Club and represent the feedback from both organizations and their constituents. These comments pertain to the revision of the draft NPDES Permit for the City of Spokane Waste Water Treatment Facility at Riverside (WA0024473). These comments represent feedback for only the following sections of the draft permit. All other comments on the draft NPES permit for the City of Spokane have been previously submitted and continue to stand and represent the opinions of the Sierra Club and Spokane Riverkeeper.

Effluent Limits, Section 1:

We support and appreciate this revision. Making the permit cap PCB discharge at 170 PG/L is the beginning of one (of several) ways in which the State and the community will achieve clean water. It is an improvement to the previous draft permit. We would further ask that compliance monitoring be done with test method 1668c for reasons elaborated on in the previous comments submitted.

Mixing zones for PCBs Section S1A, Table 2

While Table 2 suggests a dilution factor of 12.2 for Carcinogens, like PCBs, we continue to oppose discharge over the WQS at end of outfalls. The use of a mixing zone for pollutants under the assumption that the discharge of higher levels of pollutants will mix, or dilute, is flawed for certain pollutants that are bioaccumulative and carcinogenic. In short, they do not mix and continue to be carcinogenic far downriver. Toxic compounds like PCBs should not be discharged in amounts that are above the WQS.

S2 Section 7 Effluent Monitoring:

We support monthly, 24-hour composite monitoring for total PCBs in the effluent.

CSO Post Construction monitoring S14.C.c

We support the post-construction Monitoring plan.

S 18A. Compliance Schedule for PCBs and Ph

We support the proposed Compliance Schedule to optimize the NLT treatment system and evaluate the system's capacity to identify AKART and develop actions and criteria for treating PCBs (No 5-7 of Table 18) such that effluent meets State Water Quality Standards.

S18 A. Engineering documents 1.

Additional comment on the current draft permit. We support the requirement of the City of Spokane in preparing and submitting an engineering report on the feasibility of using reclaimed water. The ultimate solution to removing toxic parameters from effluent will at least partially, in our view, rely on removing some or all effluent from the Spokane River (and the States surface and ground waters).

S 17.B Spokane Regional Toxics Task Force Requirement.

We ask that the Washington State Department of Ecology (WDOE) sunset the SRRTF and that the funding be returned to the WDOE and earmarked specifically for funding projects or strategies that are in the service of implementing the removal of PCBs from the Spokane River and/or effluent.

We support the Inclusion of a requirement to network with community stakeholders in an "equivalent advisory organization" to identify implementation strategies and actions, so long as any "equivalent advisory organization" conforms to the following conditions:

- 1) The group is constructed such that there is no way in which it can transform, drift into, or function in any way as a quasi or proxy regulatory body or be involved in any kind of decision that could affect the regulatory process under the CWA.
- 2) Strict boundaries should be put on the "equivalent advisory organization" to limit its function to a strictly "advisory" capacity for implementation actions.
- 3) The group be open to all community stakeholders and put a special emphasis on "under-represented" communities whose uses are protected under the CWA.

Reopener Clause - G3

We appreciate and support this revision in the draft NPDES permit as found in Section G3.

Thank you for the opportunity to comment on this draft permit. If there are questions or issues that you would be interested in discussing, we encourage you to reach out to either or both organizations.

Respectfully,

Jerry White, Jr., Spokane Riverkeeper

Thomas Soeldner, Spokane River Team, Upper Columbia Group, Sierra Club