



June 10, 2022

Ms. Diana Washington, P.E.  
Washington State Department of Ecology  
Water Quality Program  
4601 N Monroe Street  
Spokane WA 99205-1295

Submitted through Ecology's online commenting system

Subject: Public Review comment on NPDES Permit WA-0024473  
Riverside Park Water Reclamation Facility

Dear Ms. Washington,

Thank you for the opportunity to provide comments on the City of Spokane's Public Review Draft NPDES Permit and Fact Sheet. As you know, Spokane County owns a portion of the treatment capacity at the Riverside Park Water Reclamation Facility (RPWRF), for use by current and future Spokane County sewer customers. Please accept the following comments:

- **PCB requirements**

- **Status of Application for Variance from PCB limits:** Similar to Spokane County, the City of Spokane submitted, at Ecology's request, an application for a variance from potential effluent limits for polychlorinated biphenyls. Ecology has not provided a response to these variance applications. These variance applications should be considered in the Draft Permit in light of the on-going EPA activities to develop the Spokane River PCB Total Maximum Daily Load and set new human health water quality criteria for PCBs in Washington.
- **Community Based Toxics Reduction:** Spokane County supports the concept of Community Based Toxics Reduction, but not via the Spokane River Regional Toxics Task Force (Task Force). The Task Force was proposed and developed by local NPDES permittees to conduct a voluntary alternative to a traditional TMDL process to identify and reduce sources of PCBs in the Spokane River. Now that the EPA has committed to develop a TMDL for PCBs in the Spokane River, the fundamental purpose for voluntarily participating in the Task Force has been eliminated. The Draft Permit includes the option of 'participation in an equivalent citizen advisory organization' as an alternative. Spokane County recommends this alternative include Ecology leading the development of a coordinated multi-agency effort to re-engage tribes, NGOs and other stakeholders to identify sources of PCBs and other toxics in the watershed. This citizen advisory process should not be imposed on the City of Spokane and other dischargers.

- **Cadmium Limits:** Please deleted the proposed cadmium effluent limit because the Spokane River is no longer impaired for cadmium.
- **Proposed final pH limits:** The proposed final pH limits should be deleted to allow the City of Spokane to complete the required receiving water pH study. It is premature to set future final effluent limits with a limited, site specific data set. For example, it is likely that the receiving water alkalinity during the summer low flow period is higher than the value used in the Draft Fact Sheet calculation of the proposed high and low pH limits. The receiving water study will provide site specific alkalinity for use in a future calculation.

If you need any additional information or if you would like to discuss these comments, please contact me, 509-477-7576 or [rlindsay@spokanecounty.org](mailto:rlindsay@spokanecounty.org). Thank you.

Sincerely,



Rob Lindsay, LHg  
Environmental Services Administrator

CC: file