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Testing for PCB pollution should be done at the end of the pipes coming from the dischargers rather than using "mixing zones" for testing. In fact, mixing zones should not be used for these permits.

In addition, testing at the end of the City of Spokane's and Kaiser Aluminum's pipes for PCBs should use the best test method, viz., test 1668c. It will provide a much better indicator of the pollution even if it is not yet used for compliance. The permits should also require the facilities to test for PFAS.

Since there is now an EPA study for writing a TMDL for PCBs in the Spokane River, and since it is possible that the water quality Standard may also be changed, these permits should be automatically opened and re-written if the WQS is changed and/or when the TMDL is finished and put in place.

Finally, the Spokane River Regional Toxics Task Force should be dismantled. It is a waste of money, now more than ever. Once a TMDL is finished a new advisory committee might be gathered from all stakeholders, not just or primarily dischargers, for implementation of the TMDL.

Thank you for your attention to these comments.