

Dear Department of Ecology,

I am submitting the following comments on behalf of myself and the Spokane River. The following comments are for the draft NPDES permits for Liberty Lake Sewer and Water, Inland Empire Paper Company, and Spokane County Waste Water Treatment Plant (WWTP). I care deeply about the Spokane River, its fish, and its ecosystems. I also care that all communities can use the River in a healthy way and that those uses are not denied by pollution from these facilities. It is the defining feature of Spokane and has been abused for decades.

1. Every one of these permits needs to have a “reopener clause” or definite language that will trigger an absolute reopener when the state standard for PCBs is revised to 7 pg/L and/or the PCB TMDL is approved in 2024 and requires a Waste Load Allocation (limit) for the facilities in question.
2. End the mandatory participation of these pollution dischargers in the Spokane River Regional Toxics Task Force as it is no longer a community-based process.
3. Please test for PFAS toxics in the pollution effluent coming out of the WWTP.

We love our Spokane River and believe that it deserves the highest standards possible to protect the River and all of the folks who care about it. Thanks for the opportunity to comment.

Respectfully,

Jonathan P. Keeve, MD FAAOS