

Spokane River Stewardship Partners

Working every day for a healthy river

Spokane County • City of Spokane • Liberty Lake Sewer & Water District • City of Coeur d'Alene • City of Post Falls • Hayden Area Regional Sewer Board
Avista • Inland Empire Paper Company • Kaiser Aluminum

January 24, 2012

Via US Mail and e-mail

Municipal Permit Comments
Washington Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696
(email: SWPermitComments@ecy.wa.gov)

Subject: Comments on Washington Draft Phase I & II Municipal Stormwater Permits

The 2011 Washington NPDES wastewater discharge permits issued by the Department of Ecology for facilities discharging into the Spokane River include the requirement for creation of a Spokane River Regional Toxics Task Force (Task Force). The goal of the Task Force is to develop a comprehensive plan to bring the Spokane River into compliance with applicable water quality standards for PCBs.

The Spokane River Stewardship Partners (SRSP), as part of their ongoing collaboration, have been participating in the formation and on-going functioning of this newly formed Task Force. The SRSP Washington wastewater dischargers' role on the Task Force includes providing administrative oversight, coordination and funding for the operations of the Task Force. Most of the SRSP wastewater discharge members have agreed to contribute initial funding for Task Force administrative support.

Future Task Force funding should consider the sources of PCBs to the Spokane River. Since stormwater discharges in the Washington portion of the Spokane River watershed are a recognized source of PCBs, the new Washington Phase I and II Municipal Stormwater Permits should include the following requirements for stormwater permittees in the Spokane River watershed:

1. Participation in the on-going functioning and funding of the Task Force, and
2. Evaluation and implementation of Best Management Practices (BMPs) that reduce sources of PCBs.

This Washington stormwater permit requirement will represent the first step toward broader community-wide decisions regarding ongoing Task Force funding. It is not appropriate for sewer customers to shoulder the majority of the Task Force cost when only 8% of the currently identified PCB load comes from wastewater discharges. By contrast, 19% of the currently identified PCB load comes from CSO/Stormwater. A broader community-wide discussion should identify (1) what other funding sources should be considered (in addition to NPDES wastewater and stormwater municipal permittees), and (2) how funds should be collected and administered (e.g., based on the sources of PCBs).

The SRSP Washington wastewater dischargers appreciate your consideration of these comments and look forward to collaborating with the Washington NPDES municipal stormwater permittees as part of

the Task Force. Let me know if you have any questions or comments; you can reach me at 541-306-3156 or sarah@hubbardgray.com.

Sincerely,

A handwritten signature in blue ink that reads "Sarah Hubbard-Gray". The signature is fluid and cursive, with a long horizontal stroke at the end.

Washington Discharger Executive Committee Members
Spokane River Stewardship Partners

Signed by Sarah Hubbard-Gray, Hubbard Gray Consulting Facilitator for Spokane River Stewardship Partners, on behalf of the SRSP Washington discharger Executive Committee members, which include:

Dale Arnold - City of Spokane
Tom Agnew – Liberty Lake Sewer and Water District
Doug Krapas – Inland Empire Paper Company
Bud Leber – Kaiser Aluminum
Bruce Rawls – Spokane County

CC: Grant Pfeifer – WDOE ERO
Jim Bellatty – WDOE ERO
Dave Moore – WDOE ERO
Diana Washington – WDOE ERO
Mike Lidgard – EPA Region 10
Brian Nickel – EPA Region 10
Dan Redline – IDEQ