South Fork Palouse River TMDL
Water Quality Advisory Group Meeting
June 18, 2009
10:00 am to 12:00 pm
Draft Notes

Attendees:

Michael Baker – Whitman Co Health
Rob Buchert – City of Pullman
Jim Carroll – Ecology
Eric Coats – University of Idaho
Kevin Gardes – City of Pullman
Matt Gregg – University of Idaho
Drew Hawley – Palouse Conservation District
Roland Line – Pullman resident
Les MacDonald – City of Moscow
Marty O'Malley – WSU
Janet Schmidt – WSU Whitman Co Extension
Elaine Snouwaert – Ecology

The meeting began at 10:05 am with round table introductions. The group reviewed the March meeting notes. Kevin requested the following changes:

- On page 2, 1st paragraph, last sentence: remove "and other landowners." At the time of the meeting they had only talked to Cheryl regarding a project although they have approached other landowners since the meeting.
- On page 2, 7th paragraph, 1st sentence: remove "from" (typo).

The meeting notes were approved as edited above.

The meeting was opened up for announcements. Rob announced the plans for this year's Palouse Basin Summit. The summit will be held October 6th at the Schweitzer Engineering Laboratories Events Center in Pullman. The theme this year is "Complexities on the Surface" and will include surface water and water quality issues. Ecology and Idaho Department of Environmental Quality will most likely be invited to speak.

Elaine gave an update on Colfax's and Ecology's efforts to locate the source of bacteria causing the high loading in the cities flood works. Matt from the city of Colfax had sampled the drainage that comes from the Hospital area down into town and discharges into Spring Flat Creek. He found high counts but was unable to take flows so we were unsure how the results compared to the loadings we saw in the TMDL study. Elaine requested some assistance from Ecology's Environmental Assessment Program to assist with study design and sampling. In August and September Ecology and Colfax will collect samples and flows on several outfalls, Spring Flat Creek, and the South Fork Palouse. The Colfax treatment plant will analyze the samples. Because of the potential for raw sewage in the water being collected, samplers may wear hazmat suits for protection. To dispel any unnecessary alarm, Elaine will be sure to issue a press release to inform the public of these efforts.

Elaine and Jim explained that EPA had given the report a cursory review to check to see if there may be any issues that needed to be addressed before it was submitted for review and approval. EPA requires that "daily loads" be included in the report. This is the result of a court cause that ruled that load and waste load allocations in a TMDL needed to be expressed in daily loads. For a concentration based standard like bacteria this presents some complications. When the flow is higher the daily load capacity can be higher and when the flow is lower the load capacity will need to be lower. The loading capacity

for a concentration based standard is dependent on flow and will be different for each flow. For the TMDL we used the average seasonal load to calculate an average daily load for each season. These new loading capacities were added to several tables in the report.

Les and Kevin were concerned that the loading capacities in the revised tables could become fixed numbers in the future, especially when permit writers were issuing new permits. Jim explained the report also includes new text explaining that the loading capacity is dependent on flow and that load capacities were not expressed for the permitted facilities in the TMDL report. Typically permit limits are based on the concentration standard and TMDL compliance will also be based on meeting the concentration standard. Elaine will go through the new language and tables to make sure it is very clear that the loading capacities in the tables are only accurate for the average seasonal flows and that compliance, especially for the treatment plants, should be based on meeting the concentration standard.

The group discussed what things they would like Elaine and Jim to highlight in the executive summary. The following are some of the things the group would like to see highlighted:

- Discussion of how natural sources of bacteria are addressed
- Limited data used in the TMDL
- Clarify that the daily load and wasteload allocations are flow dependent
- A description of how adaptive management is used to essentially make the report a "living document."

The meeting was opened up to a general discussion regarding the report. Les shared several comments and concerns about the report that he had not been able to submit previously. He noted that the advisory group had been left out of the acknowledgements. Elaine and Jim both agreed that omission was an oversight and will be corrected. Drew noted that Nancy Hoobler should be referred to as a former Palouse Conservation District employee.

Les provided the following additional comments:

- Page 17 – update the language regarding the proposed 2008 303(d) list since has been approved by EPA
- Page 21 – include additional information regarding Moscow's WWTP. He will send language describing the plant.
- Page 24 – add a sentence to the study objectives that indicates that the load allocations are expressed as a percent reduction to meet a concentration based standard.
- Figure 8 – rotate figure so the text is larger and legible.
- Page 55 regarding sentence that the Moscow WWTP is a large source of TSS. Since this is only true during low flow conditions the sentence will be deleted from the report.
- Table 16 – put the percent reduction in context. At this number of samples it means only one of the samples taken by Ecology exceeded the permit limit. Les may send discharge data to show that they are typically in compliance with the permit limit so that a footnote can be added to the table indicating this.
- All charts with fecal coliform loads – add a footnote referring the reader to the page that describes how to convert the load unit to number of bacteria.

- Recommendations – several edits were made to the recommendations to reflect changes made in the body of the document.
- Page 102, Idaho contributions – clarify that the load being used up by Idaho sources refers to the South Fork Palouse River and not the other cross-border streams.
- Page 108 - Les asked that we look at the paragraph for Moscow and EPA to see if it could be reworded.

Kevin also noted on page 21 that the Pullman WWTP should be described as providing year round nitrification.

Elaine will make these edits and post the revised report on the internet for the group to review. She and Jim will also draft the executive summary. Once these tasks are completed, Elaine will ask for concurrence from the advisory group through email to proceed with publishing the draft document and starting the public comment period. Advisory group members can also comment during the public comment period.

The next meeting was not scheduled. We may wait until after the public comment period to get together to discuss the comments received and any revisions to the report.

The meeting adjourned at 12:00 pm.