



SPOKANE
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Chris Hladick
U.S. EPA, Region 10
Park Place Building, Ste 155
1200 6th Avenue
Seattle, WA 98101

June 4, 2019

RE: Spokane Regional Toxics Task Force

Dear Chris,

The Spokane Riverkeeper today announces our decision to resign from the Spokane River Regional Toxics Task Force (SRRTTF), effective immediately. As a signatory to the SRRTTF since its 2012 inception, we have invested considerable energy and time toward the success of the Task Force, and we have deliberated carefully before reaching this decision. However, it is necessary for us to step away from our formal participation in the SRRTTF at this time, and we respectfully register the following recommendations and concerns:

- **We call for the work of the SRRTTF to be formally folded into a conventional Total Maximum Daily Load (TMDL).**

We stand by our previous efforts to help the Task Force succeed, and we believe that parts of this process are worth keeping and reforming. As such, we call for the scientific sampling and implementation actions of the SRRTTF to be folded into a conventional Clean Water Act cleanup plan with regulatory accountability.

A conventional TMDL would assign a total load limit for PCBs, and would assign waste load allocations for dischargers and load allocations for non-point sources. The work of the SRRTTF could perhaps prove effective in the form of an implementation team, but only when scaffolded by mandatory pollution loading limits. A total pollution loading limit should be developed under the NPDES program and assigns limits to nonpoint sources of pollution. This would provide the framework for benchmarks, compliance schedules, and timelines inside the NPDES Permits, which would also include a requirement for effluent limits with Discharge Monitoring Reports.

- **We stand behind the EPA-promulgated 2016 Washington State Water Quality Standards for PCBs and we call for their continued support from all stakeholders in the Spokane Basin.**

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The EPA's 2016 water quality standards should be a cornerstone upon which all other cleanup actions and processes follow. These criteria are scientifically calculated to bring us to clean fish and should be the standard from which we all work. However, local efforts to petition the EPA to rescind its water quality standards for PCBs have eroded our confidence in the SRRTTF. We are no longer convinced that meeting water quality standards is indeed the goal of all SRRTTF stakeholders. We cannot continue to be a signatory to an entity whose members whose members are involved in efforts to change the very goalposts by which success or failure are to be measured. To retain our own integrity and that of our efforts, we are suspending our involvement in the SRRTTF.

We would like to emphasize that the Spokane Riverkeeper will continue to 1) monitor and comment on SRRTTF activities and 2) be open to dialogue on the issues at stake. We are well aware that collaboration is a necessary part of these difficult community processes, and we value opportunities to work productively with other stakeholders toward true, standards-based progress. As such, we are actively engaged with other stakeholders and with the WDOE on several other major issues; we will continue our current presence with two other regional TMDL processes and with the Agricultural Water Quality Advisory Committee, and we are continuing our involvement as a stakeholder on the Clean Water and Agricultural Guidance processes.

If there are other opportunities that arise, we will certainly examine these and assess whether our involvement can help and improve the process of protecting and cleaning up the Spokane River.

Respectfully,

Jerry White, Jr.
Spokane Riverkeeper
Center for Justice
35 W. Main Street, Suite 300
Spokane WA 99201

CC: Mr. Dan Opalski, Director of Environmental Cleanup, EPA Region 10
Ms. Lucy Edmondson, Director Washington Operations Office EPA, Region 10
Ms. Maia Bellon, Director of Washington Department of Ecology
Ms. Heather Bartlett, Program Manager, Washington Department of Ecology
Ms. Brooke Beeler, Director of Eastern Regional Office, Washington Department of Ecology
Ms. Adriane Borgias, Water Quality Section Manager, Eastern Regional Office
Washington State Department of Ecology