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Public Works Department  
Water Reclamation Division

Water Reclamation Facility  
NPDES Permit ID-0025852

**TOXICS MANAGEMENT PLAN  
ANNUAL REPORT 2018**

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## Introduction

As a condition of the 2014 NPDES Permit ID-0025852 (the Permit), the City of Post Falls (the City) was required to create a Toxics Management Plan (TMP) by June 20, 2015. The TMP was created on June 10, 2015 and implemented December 18, 2015. To date, the City has received no comments on the plan. Beginning December 20, 2016, the City is also required to submit an annual toxics management report to the Environmental Protection Agency (EPA) and Idaho Department of Environmental Quality (IDEQ). The following report summarizes the actions concerning the time period from December 1, 2017 to November 30, 2018.

## Permit Requirements

The requirements for this report are listed in the Permit in Section 2.I.2. Those requirements specify that this report include:

- 1) *Monitoring results for PCBs and 2,3,7,8 TCDD for the previous 12-month period, including laboratory data sheets.*
- 2) *Copies of education materials, ordinances (or other regulatory mechanisms) inventories, guidance materials, or other products produced as part of the TMP.*
- 3) *A description and schedule for implementation of additional actions that may be necessary, based on monitoring results, to ensure compliance with applicable water quality standards.*
- 4) *A summary of the actions the permittee plans to undertake to reduce discharges of PCBs and 2,3,7,8 TCDD during the next reporting cycle.*
- 5) *A summary of the actions taken to reduce discharges of PCBs and 2,3,7,8 TCDD during the previous 12-month period.*

## Spokane River Regional Toxics Task Force

Although participation of the Spokane River Regional Toxics Task Force (SRRTTF) was not a required element of the TMP, many actions of the group are particularly pertinent to the City's efforts. The City has been an active participant in the SRRTTF and voluntarily contributed funding toward the group's efforts. Monitoring conducted by the SRRTTF in 2014, 2015, and 2016 indicates that concentrations of PCBs in the Idaho section of the Spokane River are very low. The in-river concentrations are low enough that it is not possible to precisely quantify them but a semi-quantitative approach indicates that water column concentrations in Idaho meet water quality criteria. This data correlates with data the City has collected independently of the SRRTTF.

## Monitoring Results for Oct. 1, 2017 – Sept. 30, 2018

### Laboratory Data

The Permit requires that influent and effluent samples be monitored for total PCBs and 2,3,7,8 TCDD and that surface water be monitored for PCBs. Frequency requirements and toxic monitoring results are listed in Tables 1, 2, 3, and 4. The City's Surface Water sampling data will be further discussed in the Surface Water Monitoring Report due in February. See Appendix A for all PCB laboratory data sheets and Appendix B for 2,3,7,8 TCDD laboratory data sheets. Data summarized in this report includes data collected from October 2017 through September 30, 2018. The end date of this reporting period coincides with the end of the third quarter of 2017. As the fourth quarter is ongoing, it will be reported in the next annual report. This

difference from the time period of the overall TMP annual report is to align the data reporting with the quarterly testing required in the City’s NPDES Permit.

Table 1: Sampling Schedule

<b>Toxics Monitoring Schedule</b>		
	<b>PCB Congeners</b>	<b>2,3,7,8 TCDD</b>
<b>Influent</b>	1/2 months	1/quarter
<b>Effluent</b>	1/quarter	1/quarter
<b>Surface Water</b>	2/year	N/A

Table 2: PCB Results

<b>Influent/Effluent PCB Congener Monitoring Results</b>		
	<b>Influent</b>	<b>Effluent</b>
	(pg/L)	(pg/L)
<b>Oct-17</b>	6062	
<b>Nov-17</b>	7350	73
<b>Jan-18</b>	5975	57
<b>Mar-18</b>	5952	
<b>May-18</b>	7121	28
<b>Jul-18</b>	8698	24
<b>Sep-18</b>	5269	

Table 3: 2,3,7,8 TCDD Results

<b>Influent/Effluent 2,3,7,8 TCDD Monitoring Results</b>		
	<b>Influent</b>	<b>Effluent</b>
	(pg/L)	(pg/L)
<b>Nov-17</b>	<0.53	<0.51
<b>Jan-18</b>	<0.52	<0.53
<b>May-18</b>	<0.54	<0.60
<b>Jul-18</b>	<0.54	<0.53

Table 4: Surface Water PCB Results

<b>PCB Congener Monitoring Results</b>		
	<b>Upstream</b>	<b>Downstream</b>
	(pg/L)	(pg/L)
<b>Oct-17</b>	0.2	46
<b>Jun-18</b>	0.2	21

## Educational Materials 2018

The 2018 public outreach activities included maintaining the City’s existing PCB educational webpage and a new effort for 2018 to distribute PCB best practices information with building

permits. Some elements of the webpage are PCB history, sources, regulations, and safety. This webpage was created to satisfy permit condition II.I.1.f. The website is located at <https://www.postfallsidaho.org/departments/public-works/pcbs/>. Additionally, in 2018, the City's Building Division began distribution of an informational packet on best management practices for PCBs with all remodel permits. This information was developed through the SRRTTF and is intended to help contractors avoid inadvertently spreading PCB materials from older buildings. An example is attached as Appendix C.

A PCB educational website was also developed through the SRRTTF, with inputs and guidance from participants, including the City. This website focuses on work that is being done to reduce PCBs in the Spokane River and provides resources that businesses and individuals can use to help source reduction. The website is located at <http://spokaneriverpcbfree.org>.

## 2018 Summary of Toxics Reduction Actions

As outlined in the TMP, the City has completed the following actions during the past 12-month period to reduce discharges of PCBs and 2,3,7,8 TCDD:

- The City monitored influent PCB concentrations for indications of discharges over 3 ug/L in an effort to identify any discharges to the collection system that violate the Sewer Use Ordinance. No increases of such magnitude were identified in 2018.
- Through ongoing maintenance activities such as line cleanings and sewer inspections, City staff monitor the collections system for infiltration and inflow. No substantial I&I issues were discovered during the reporting period. These would have been addressed in an effort to keep soils, sediments, storm water, and groundwater, which might contain PCBs and 2,3,7,8 TCDD, from entering the collection system.
- After reviewing influent and effluent concentrations during the reporting period, the City does not believe PCBs or 2,3,7,8 TCDD from regulated pretreatment users are causing pass through or interference. Effluent concentrations are generally orders of magnitude lower than influent concentrations.
- The City continued to monitor the work of larger agencies, specifically the City of Spokane and Washington State, in their efforts to implement a "PCB Free" Purchasing Policy. No progress was identified toward the development of an independent "PCB Free" products database, which was identified as a critical need in order for the City of Post Falls to consider PCB concentrations in procured items.
- Through the SRRTTF, the City of Post Falls supported the development of an educational program for construction operators on the proper disposal of products which may include PCBs.

## 2019 Toxics Reduction Actions

In the effort to comply with Permit requirements and reduce toxic discharges, the City will undertake the following actions during the next reporting cycle.

- The City's greatest contribution to the preventing PCBs from entering the Spokane River is the continued operation of the Water Reclamation Facility. Based on the SRRTTF data, the City of Post Falls removes among some of the highest percentage of PCBs into the Spokane River, when compared with other treatment technologies. The City will continue to operate the WRF to protect the river.

- Public education focused on proper disposal of products containing PCBs below TSCA requirements yet still hazardous to water quality will continue, as stated in the TMP. This may include educational booths at public events, working with the local school district to target students, or educational materials provided to the public.
- Monitoring for I&I into the Collection System will continue as part of the ongoing maintenance of the system.
- Monitoring of influent PCBs will continue to determine if a new user is contributing elevated levels of PCBs to the POTW. The City will enforce the Sewer Use Ordinance should any discharge containing PCBs over 3 ug/L be discovered.
- Monitoring of product testing programs for a robust database and PCB free certification programs will continue.
- Support of the SRRTTF will continue.

## Monitoring Results-Based Implementation Needs

Based on toxics monitoring results from the last 12-month cycle, no additional actions are needed to comply with water quality standards.