

Valerie

I gave testimony before an EPA hearing officer on April 4 at the CDA Senior Center on the draft NPDES permits for the Spokane River. I think it is a good indicator of what the SRA Board of Directors does for the Association.

Clyde Sheppard

Testimony to EPA Hearing Officer

IT IS THE POSITION OF THE SPOKANE RIVER ASSOCIATION (Property Owners above the Post Falls Dam) THAT THE CURRENT MEASURED QUALITY OF THE WATER IN THE SPOKANE RIVER NOT BE DEGRATED BY THE ISSUANCE OF THE PROPOSED DRAFT NPDES PERMITS.

A number of years ago our Association opposed the previous NPDES Permit to Hayden's Wastewater Treatment Facility because it proposed to discharge wastewater to the Spokane River during "low flow" or summer conditions when the PF Dam was closed. After lengthy discussions and a lawsuit, the permit was granted to the Hayden Wastewater Treatment Facility without the right to discharge during "low Flow" conditions. It is our understanding that the current draft NPDES Permit continues that exclusion until the Hayden facility obtains target phosphate concentrations. Under this understanding SRA has no serious objections to the proposed permits.

The SRA has for many years been a partner with IDEQ (Idaho Dept of Environmental Quality) under the Citizens Monitoring Program to monitor the water quality of the Spokane River above the PF dam. This program has been in effect since the early 1990's. Over that period we have seen significant improvement in water quality as a result of the CDA Wastewater Facility's upgrade to reduce phosphate levels in the Spokane River from greater than 20 ppb of phosphate in the early 1990's to the current level of 9 ppb from 2000-2005. These data have been collaborated by recent data obtained by the BEMP (CDA Basin Environmental Monitoring program) sponsored by EPA in the CDA Basin Superfund Area. This data was obtained by USGS (US geological Society) who will continue the Spokane River Monitoring at the WA/ID border.

It is the goal of SRA to keep the water in the Spokane River as clean as economically feasible and strongly desire that no additional wastewater be introduced into the river that would degrade the current phosphate values. It is quite obvious that if the Hayden Facility prematurely introduces wastewater into the river under a new permit, prior to CDA facility further reducing their phosphate loading to the river, the total would exceed the currently measured parameters in the river. We believe EPA, IDEQ and WA also desires the same thing.

As a second issue we believe the current monitoring by IDEQ of all the wastewater treatment facilities of one time a year is not satisfactory. Many of our members have noted that both significant amounts of odor and solid matter have appeared at or below the CDA wastewater outfall. We believe that EPA, IDEQ and the operators of the facilities should strive to make an improvement in this situation as part of the draft permit.

To repeat: It is our position that the draft permits make things better but not to make anything worse.

Rusty

PS I misplace Steve Shamion's E Mail Address, could you forward him a copy.

4/10/2007