What is the best path to reduce PCB discharges to the Spokane River?

	Issue discharge permits without a PCB Variance	Adopt a PCB Variance for individual discharger	Develop a TMDL
Timeframe covered	Permits would need to meet PCB criteria (7ppq) at **end-of-pipe.** Permits updated every 5 years.	Sets the **highest attainable condition (HAC)** for each discharger & specific pollutant minimization requirements. Review progress at least every 5 years.	Development and approval of a TMDL is not on a set timeframe. Effectiveness of TMDL is usually determined 15-20 years from EPA approval of TMDL.
Pollution Sources addressed	Point source discharge from the individual discharger.	Both point source discharge and nonpoint sources are addressed through Variance requirements for each discharger.	Wasteload allocations (WLAs) set for point sources in permits. Load allocations (LAs) set for nonpoint sources with limited ability for implementation.
Numeric compliance measurements	Effluent limit based on current standard (7 ppq), using method 608 (measures to 50,000 ppq) to determine permit compliance.	The HAC is set based on method 1668 (measures down to 7 ppq). Effluent limits in permit are based on the HAC. Permit compliance uses method 608. **If no progress, then it can be revoked**.	EPA approval of a TMDL does not require implementation. Variance may still be needed to meet waste load allocations in TMDL.
Other compliance measurements	Permit likely won't have other measures for reducing PCBs.	Variance requires discharger to reassess PCB reduction success and apply adaptive management (e.g. review for new technologies). Periodic review will use river data to determine progress.	Compliance is not assessed in a TMDL.