



CASCADIA  
CONSERVATION DISTRICT

April 23, 2008

Ken Koch  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

DEPARTMENT OF ECOLOGY  
APR 25 2008  
WATER QUALITY PROGRAM

Re: Additional Public Review of the Draft Water Quality Assessment for Washington

Dear Mr. Koch,

4,4' – DDE is a breakdown product of DDT. A TMDL has already been completed in the Wenatchee for DDI. Because 4,4' – DDE is a breakdown product of DDT and the TMDL identifies cleanup actions for DDT, it is appropriate that any DDT cleanup actions/BMPs performed would simultaneously work on reducing 4,4' – DDE in the environment and on impacted waterbodies.

The WRIA 45 Water Quality Technical Subcommittee would like Ecology to consider reclassifying the 4,4' – DDE (Listing ID 12388) from the proposed 303d list from a Category 5 parameter to a Category 4b (a pollution control plan is in place for DDI and any work done on DDT is simultaneously expected to work on the 4,4' – DDE pollution problem).

The pollution control plan in place that would support this reclass of categories for 4,4' – DDE is the completed DDT TMDL. It seems that while completing the DDT TMDL we administratively missed stating the connection between DDT and 4,4' – DDE. It is our position that BMPs treat DDI can be anticipated to also work on 4,4' – DDE.

I look forward to your response.

Respectfully,

Michael J. Rickel  
WRIA 45 Water Quality Technical Subcommittee Coordinator  
Cascadia Conservation District