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Federal Water Quality Coalition

January 18, 2012

E-Mail To:
fishconsumption@ecy.wa.gov
Washington State Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

RE: Comments on Fish Consumption Rates Technical Support Document, Publication No. 11-09-050

Ladies and Gentlemen:

The Federal Water Quality Coalition (the "FWQC") is pleased to provide the following comments on Publication 11-09-050, "Fish Consumption Rates Technical Support Document: A Review of Data and Information about Fish Consumption in Washington" ("Technical Support Document"), which was issued by the Washington Department of Ecology in September 2011.

The FWQC is a group of industrial companies, municipal entities, agricultural parties, and trade associations that are directly affected, or which have members that are directly affected, by regulatory decisions made by the U.S. EPA and States under the federal Clean Water Act. The Coalition members, for purposes of these comments, are as follows: Alcoa, Inc., American Chemistry Council, American Coke and Coal Chemicals Institute, American Forest & Paper Association, American Iron and Steel Institute, American Petroleum Institute, Association of Idaho Cities, Auto Industry Water Quality Coalition, City of Superior (WI), Edison Electric Institute, Freeport-McMoRan Copper & Gold, Inc., General Electric Company, Hecla Mining Company, Indiana Coal Council, Koch Industries, Inc., Mid America CropLife Association, Monsanto Company, National Association of Home Builders, NewPage Corporation, Orange County Sanitation District, Rayonier Corporation, Rubber Manufacturers Association, Shell, Utility Water Act Group, Western Coalition of Arid States, Western States Petroleum Association, and Weyerhaeuser Company.

FWQC member entities or their members own and operate facilities located on or near waters of the United States. Some of these facilities are located in the State of Washington. Many of these facilities operate pursuant to



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individual and/or general NPDES permits for discharges into those waters. Those permits often include, and will include in the future, effluent limitations based on water quality standards established by the States or EPA. The Technical Support Document will directly affect the development of water quality standards in the State of Washington, and may also serve as a precedent in the development of water quality standards in other States. The FWQC therefore has a direct interest in the matters addressed in the Technical Support Document.

The FWQC supports the comments filed as to the Technical Support Document by the National Council for Air and Stream Improvement and by the Northwest Pulp & Paper Association, and we incorporate by reference those comments and the recommendations included therein.

The FWQC appreciates the opportunity to submit these comments on the Technical Support Document. Please feel free to call or e-mail if you have any questions, or if you would like any additional information.



Fredric P. Andes
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