

**From:** NOREPLY@ECY.WA.GOV  
**Sent:** Friday, July 22, 2011 9:14 AM  
**To:** 303d  
**Cc:** Herold, Mike (ECY); Brown, Chad (ECY); Braley, Susan (ECY); Koch, Ken (ECY)  
**Subject:** \*\*\* WQ ASSESSMENT - COMMENT ON LISTING 64447 \*\*\*0026

\*\*\*\*\*

**WATS 2010 REVIEW TOOL: Comment on Listing 64447**

\*\*\*\*\*

SENDER'S NAME: Lincoln Loehr  
SENDER'S EMAIL: [lcloehr@stoel.com](mailto:lcloehr@stoel.com)  
SENT: 7/22/2011 9:14:19 AM  
WEB LINK: [Listing 64447](#)  
MAP LINK: [Listing 64447](#)

\*\*\*\*\*

**COMMENT:**

I do not think it is appropriate to list for hepatopancreas data. Hepatopancreas consumption is not representative of the fish consumption considered in the derivation of the human health water quality criteria in 40 CFR 131.36. The Department of Health essentially recommends against eating the hepatopancreas anywhere in our marine waters. I also note that there is not a water quality criterion for 2,3,7,8-TCDD TEQ, so it was appropriate to not use that for listing, but only for information.