

**From:** NOREPLY@ECY.WA.GOV  
**Sent:** Friday, July 22, 2011 8:56 AM  
**To:** 303d  
**Cc:** Herold, Mike (ECY); Brown, Chad (ECY); Braley, Susan (ECY); Koch, Ken (ECY)  
**Subject:** \*\*\* WQ ASSESSMENT - COMMENT ON LISTING 64460 \*\*\*0024

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**WATS 2010 REVIEW TOOL: Comment on Listing 64460**

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SENDER'S NAME: Lincoln Loehr  
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SENT: 7/22/2011 8:56:50 AM  
WEB LINK: [Listing 64460](#)  
MAP LINK: [Listing 64460](#)

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**COMMENT:**

I think that listing based on hepatopancreas tissue data are not appropriate. Several reasons. 1) the consumption rate of hepatopancreas is unlikely to equal 6.5 grams a day for 70 years for any individual, 2) the Department of Health essentially recommends against eating the hepatopancreas (or "crab butter") from anywhere in Puget Sound, Specifically, the DOH says: Advice on Eating Crab from Puget Sound Eat Dungeness or red rock crab from non-urban areas. Don't eat the crab butter or viscera. Viscera are the internal organs under the shell. see, <http://www.doh.wa.gov/ehp/oehas/fish/crab.htm> Perhaps this is an issue for revision to the WQP 1-11, in which case, please accept this as a comment for the listing policy revisions. If you cook crab in boiled water, don't use the water for soup stock, broth, or gravy. Data has shown that crabs from industrial urban areas may contain more contaminants than those from non-urban areas, and that crab viscera has more contaminants than crab muscle.