

From: NOREPLY@ECY.WA.GOV
Sent: Friday, July 22, 2011 5:17 PM
To: 303d
Cc: Herold, Mike (ECY); Brown, Chad (ECY); Braley, Susan (ECY); Koch, Ken (ECY)
Subject: *** WQ ASSESSMENT - COMMENT ON LISTING 64461 ***0033

WATS 2010 REVIEW TOOL: Comment on Listing 64461

SENDER'S NAME: Lincoln Loehr
SENDER'S EMAIL: lcloehr@stoel.com
SENT: 7/22/2011 5:17:42 PM
WEB LINK: [Listing 64461](#)
MAP LINK: [Listing 64461](#)

COMMENT:

This comment pertains both to this listing and to other listings based on hepatopancreas concentrations. In reviewing revisions to the department's listing policy WQP 1-11 I note that the current wording in the section discussing listing criteria for toxic substances in tissue says that, "fin fish fillet tissue samples, whole shellfish tissue samples, and edible shellfish muscle samples must have at least three single-fish samples or a single composite sample made up of at least five separate fish of the same species. Fin fish fillet tissue samples may be analyzed with skin on or skin off." It does not say to use the hepatopancreas from crabs. Only crab muscle should be used. Whole body clams and oysters may be used. Only fish fillet tissue should be used (not the fish organs). All the proposed listings based on hepatopancreas concentrations should not be used.