

**From:** [Dan Wrye](#)  
**To:** [ECY RE SWQS](#)  
**Cc:** [Carla Vincent](#)  
**Subject:** Pierce County Comments on Proposed Rule  
**Date:** Monday, March 23, 2015 3:37:53 PM

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Below are comments from Pierce County Executive Pat McCarthy, excerpted from a letter to Senator Erickson with respect to the Governor's Toxics Reduction proposal, as they apply to the current proposed rules:

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Water Quality Standards (“Fish Consumption Rates”)

This third and important component of the Governor's Toxics Reduction initiative is updating the State's Water Quality Standards for human health criteria. We understand and support an update of these standards over the existing National Toxics Rule that was put into effect in Washington some 20 years ago. These standards should better reflect and protect Washingtonians. I appreciate that today we have the benefit of discussing a much more comprehensive approach to controlling toxics exposure to Washington residents through E2SHB 1472. That broader role of source control will reduce toxics exposures through all pathways, not solely through water. This control of toxics exposure through all pathways rather than one is what enables us to consider a 1:100,000 cancer risk, and thus, more attainable means of treatment for some of the chemicals.

Nonetheless, Pierce County has serious concerns that other factors used in deriving allowable discharge limits will still result in an inability to detect and treat the majority of chemicals in the proposed standards. Additionally, I have serious concerns that these limitations and expectations will result in huge and potentially unsustainable cost impacts to both business and local governments without some widely available and used tools to soften and allow technologies to achieve cost effectiveness. Therefore, I cannot support this portion of the overall toxics reduction initiative.

We understand that Department of Ecology's approach to adopting human health criteria has also included “implementation tools.” However, as proposed, the required conditions for their use are so restrictive they offer little hope of ever being used and thus contribute to my concerns about unsustainable costs. I believe and recommend that timeframes for compliance schedules and variances should be explicitly set in the standards to be of such durations that treatment and control technologies reach the status as being known, widely available, and cost effective before compliance is required.

**Dan D. Wrye**

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