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**From:** wsdf@msn.com [mailto:wsdf@msn.com]  
**Sent:** Saturday, October 16, 2010 11:27 AM  
**To:** Bresler, Helen (ECY)  
**Subject:** comments on Trading Credits Guide

Helen,

Thank you for the guide document on nutrient trading credits...I understand this is a first go at expectations and experience will inform future trading processes, policies and guidelines...so I will certainly understand if there isn't an exact answer on the following question, of if the answer depends on specific or local conditions...but I'll ask the question, vague as it is, anyway.

Do you all have more thoughts in the area of:

a. when is a permitted source eligible to buy a credit to fulfill a NPDES permit, the term at the end of the document says after the "best control technology that can be achieved"...this is a new term for me and not sure what it means... in my mind there is a reasonableness test here that sets a line... and the trade occurs across the line...

same applies to:

b. what creates a trade-able credit either for a permitted source or other sources that want to reduce nutrient loads to create a trade-able credit...is it only reductions above the best control technology that can be achieved?

Again, I am not sure there is an answer, yet. Maybe tangible examples and experience will bring more clarity.

Thanks for your thoughts and work.

*Jay Gordon*

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