

Assess progress using ongoing Chinook sampling and analysis from WDFW and other descriptive measurements. The permit factsheet implies that PBDE contamination in juvenile salmon is the impetus for the PBDE influent monitoring and pretreatment program. WDFW's T-Bios team plans to continue monitoring juvenile Chinook for PBDEs during the permit period. Data from this research should be used as a gauge to assess the effectiveness of changes intended to reduce PBDE pollution. Additional measures of progress could include percent reduction of total PBDEs and reduction in total suspended solids.

Evaluate long-term capital improvements to reduce the impact multiple waste streams. PBDEs are not the only pollutant highlighted in the draft permit (PFAS and nutrients) and it is likely that the facility will face problems with other contaminants of emerging concern in the future. More advanced treatment options exist to better address multiple waste streams, including PBDEs. Ecology should support COE in completing an assessment over the 5-year permit period concerning the cost and benefits of other, more advanced treatment technologies and creating a plan to implement more advanced treatment.

Minimize costs associated with PBDE pollution being shouldered by the least able to pay. Actions to protect the environment have associated expenses that will most likely be passed onto the ratepayers. These rate increases can disproportionately impact lower-income users. This reality is compounded when in many cases this user segment contributes relatively less pollution. We would encourage COE, with Ecology's support, to pursue rate structures that are adjusted to address this circumstance and grant programs that may offset these expenses to users or directly to the facility. A pretreatment program that holds individual industrial users accountable for PBDE pollution will also help minimize these costs from being externalized to other users.

Lastly, we understand that the NPDES permit is not the only tool to prevent PBDE pollution. There is much more that can be done throughout levels of government, businesses, and the community. Long Live the Kings looks forward to working with all parties to pursue positive outcomes for salmon.

Sincerely,



Jacques White
Chief Executive Officer