



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

January 15, 2013

Open Letter to Interested Parties

RE: Final Fish Consumption Rates Technical Support Document

Dear Ladies and Gentlemen:

In the face of new and lingering toxic threats, how do we continue to improve our protection of people who eat fish from Washington waters and our communities who rely on fish for a large portion of their diet? This question is fundamental to many toxic site cleanup decisions and will be crucial as we adopt human health criteria under the Clean Water Act in the state's Water Quality Standards. The Fish Consumption Rates Technical Support Document evaluates available data on fish consumption by Washington residents and provides information indispensable to making these decisions. It tells us how much fish people are actually eating.

I want to offer my sincere thanks to the many people who reviewed and critiqued this document over the past year. This final report provides a firm foundation for a number of important technical and policy decisions ahead. Our state has some of the best fish and shellfish in the nation, and we want to keep it that way. Fish and shellfish are an important part of healthy diet and are part of the natural resource assets that enrich our lives and make Washington State a great place to live and do business.

Along with any new information that becomes available, this report will inform our cleanup decisions as to what the reasonable maximum exposure to contamination from fish consumption is at specific sites. It will also play an important role in our development of human health criteria in our Water Quality Standards.

The Water Quality Standards work underway is especially challenging. Targeting the appropriate fish consumption rate is just one of the many decisions before us. Washington has some of the highest fish-consuming communities in the country, but we are currently using the



lowest fish consumption rate in our standards based on EPA's National Toxics Rule of only 6.5 grams/day. The studies examined in this report demonstrate that we have communities that eat fish from our waters at much higher rates. We will also need to determine what the appropriate human risk level targets are for each of the regulated chemicals and how to calculate those risks. Much concern has been expressed that using higher fish consumption rates in combination with other conservative public policy choices about exposure and risk could create an impossible burden for regulated dischargers. While these public policy choices have not been made, this is a valid concern. This is why we are concurrently looking at how we can implement any new standards in a way that makes steady progress toward fully protecting our people and the environment, while providing a sensible, predictable compliance pathway for our businesses.

I firmly believe that Washington State can and will find the right balancing point that continues to move us ahead in protecting our citizens and environment from toxic pollution. No state is doing more to protect its citizens from the vast array of modern toxic threats than Washington State, and this is just one more important step in that direction. Using information in this document and applying it through our sediment and water quality standards will help us focus on the proper targets for protecting people and our environment, while our efforts to modernize and improve our available compliance tools will ensure that progress is being made.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ted Sturdevant', with a stylized, cursive script.

Ted Sturdevant
Director