

## Maya Newman

Implementing variances without a clearly defined time-frame of when the discharger will meet the original standard is extremely risky. Effectively, dischargers will be able to set their own standards based on their economic motivations and not the health and safety of the river and all the people and animals that rely on it. As the proposal is currently written, they will have little motivation to get into compliance with the original standard in a timely manner. It is a pass to pollute. Setting a variance for PCBs is also extremely risky because these contaminants do not simply go away. They bioaccumulate in fish and sediments and are extremely difficult to clean up. The consequences of this will be felt for generations.