



June 12, 2023

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Sarah Penfield

Submitted electronically to Sarah Penfield via email

Sarah.penfield@ecy.wa.gov

Re: SeaPort Sound Terminal, LLC NPDES (National Pollutant Discharge Elimination System) Permit Renewal

Dear Ms. Penfield,

Executive Director

Melissa Malott

Thank you for providing the opportunity to review and comment on the SeaPort Sound Terminal, LLC NPDES (National Pollutant Discharge Elimination System) Permit Renewal WA0003204 hereinafter referred to as the "Permit".

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Communities for a Healthy Bay (CHB) is a 31-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

CHB staff and members of our Policy and Technical Advisory Committee have reviewed the permit application and associated documents. After our review, we are concerned about the lack of monitoring and strategies to reduce 6PPD-quinone, a known contaminant that harms salmon and aquatic systems. For the purposes of this comment letter, we specify 6PPD-quinone, but we are referring to both 6PPD-quinone and 6PPD together.

The permit fails to include monitoring and discharge prevention measures for 6PPD-Q

"6PPD stands for the chemical N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine. It's a chemical that prevents automotive tires from degrading (i.e. breaking down) and helps them last longer. When 6PPD is exposed to air, it reacts with ozone to create 6PPD-quinone, pronounced like "qui-KNOWN," and also referred to as 6PPD-q. 6PPD-quinone is lethal to coho salmon and can contaminate water systems."

-Washington Department of Ecology webpage on [Tire anti-degradant \(6PPD\) and 6PPD-Quinone](#), accessed June 12, 2023.

6PPD-Q, a chemical compound used as a tire additive to prevent tire aging and cracking, poses a significant threat to salmon and other marine animals. When tires wear down, 6PPD-Q is released into the environment, eventually finding its way into waterbodies where these aquatic organisms reside. Recent studies have shown that 6PPD-quinone

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transforms in water, forming a highly toxic compound known as 6PPD-quinone. This transformation poses a serious risk to the health and survival of salmon and other marine animals. Exposure to 6PPD-quinone has been found to cause oxidative stress, DNA damage, and impair the immune and reproductive systems of aquatic organisms. Studies have shown that exposure to 6PPD-quinone pollution can impair the ability of salmon to detect predators, affect their growth and development, and even lead to mortality. Additionally, studies have indicated that 6PPD-quinone can accumulate in the tissues of these animals, leading to long-term exposure and potential bioaccumulation in the food chain. The toxic effects of 6PPD-quinone on salmon and other marine animals can disrupt the delicate balance of ecosystems, impacting their populations and overall biodiversity.

We want to emphasize the detrimental impact of 6PPD-quinone pollution on the vital salmon habitat in the area. The discharge of this pollutant poses a severe threat to the health and well-being of salmon populations, which play a crucial role in our ecosystem and cultural heritage, and there are reasonable means to control it.

The Seaport Sound Terminal causes 6PPD-quinone pollution into the Hylebos waterway and Commencement Bay. Vehicles are present on this permittee's site regularly, and tires leave dust and debris on the site. Tires have 6PPD-quinone, and it attaches to the dust and debris left on the site. Stormwater is full of tire dust/debris with 6PPD-quinone, and as stormwater runs off, it carries 6PPD-quinone with it.

Seaport Sound Terminal's stormwater outfalls must be monitored and treated for 6PPD-quinone. Unfortunately, the draft permit includes no requirements for the monitoring or treatment of 6PPD-quinone. While there are not standard testing methods for 6PPD-quinone in the regulations, Ecology can use its authority to designate a testing method. Additionally, there are known stormwater treatment methods for 6PPD-quinone. At a minimum, the permit should require enhanced monitoring and testing for 6PPD-quinone for a year, ensuring that one rainy season is included, with a requirement that treatment be installed at those locations showing 6PPD-quinone in the second year.

Thank you for providing the opportunity to review and comment on the SeaPort Sound Terminal, LLC NPDES (National Pollutant Discharge Elimination System) Permit Renewal WA0003204. Due to the risks of 6PPD-quinone on salmon and marine systems near Seaport Sound Terminal, we urge the Department of Ecology to issue include monitoring and treatment requirements for 6PPD-quinone on site. If you have questions or need clarification of any of our comments, please contact Melissa Malott at mmalott@healthybay.org.

Sincerely,



Melissa Malott, Executive Director
Communities for a Healthy Bay