

Robert Loomis

Ladies/Gentlemen: I write with respect to the proposed PCB variance(s) relative to the Spokane River. Though I am not formally trained as an organic chemist I do have considerable experience in the fields of chemistry and toxicology. In my view this proposed DOE variance(s) is not supported by good science, but rather is driven by short-term political and business considerations. PCBs are a highly persistent class of molecule which is a known toxicant. The long-term health of the river and the environmental health, human and animal health considerations should be of paramount concern in DOE decision-making. I strongly urge the variance(s) be denied and instead DOE develop, implement, and legally defend a plan predicated on a total daily maximum PCB load for the Spokane River, which is in turn predicated on the best available science. For decades business interests have decried such regulation in the public interest, frequently citing burdensomeness, inability to comply, excess cost, etc. Yet when the law takes effect business interests have always found a cost effective way to comply. It will be so again. Please, do not bow to political and business interests, but rather put the broad public interest first.

Sincerely,

Bob & Pat Loomis