

Doug Dixon

There is not any BAT today to meet the proposed 15 ppm copper limits. At Pacific Fishermen Shipyard, which thankfully is not subject to this permit, the limit was set at 71 ppm only after studying and trialing 3 different treatment systems, ion exchange, electrocoagulation and aluminum bauxite passive filtration.

Only on a clean new installation could we get the copper down to 20 ppm but have successfully kept it under 71 ppm with aluminum bauxite but only after a half million dollar investment that nearly broke us. Please be real about your request to reduce copper and take the time to verify that it is as detrimental as you think and do a cost benefit analysis first. I believe the science is old and questionable regarding the ppm and its effects.

Doug Dixon
Pacific Fishermen Shipyard
and
Bremerton Yacht Club