## Cheryl Mitchell

I am an attorney in Spokane, Washington and I'm a former chairperson of the Washington State Bar Association"s Animal Law Section. My comments are my own and do not represent the views of either the Bar Association or the Animal Law Section. My reason for writing is to ask that you to implement strong measures that will be effective in reducing harmful discharges of PBDEs, PFAS, and nutrient pollution in the wastewater discharge permit for the Everett Wastewater Treatment Plant. Wastewater treatment plants are a primary source of PBDEs and PFAS. It is scientifically established that In Puget Sound, high levels of PBDEs have been found in salmon, orcas, and also in human breast milk. PFAS and nutrient pollution are pervasive nationwide, including in our waterways. The science is clear on this matter – these pollutants are causing harm to threatened salmon, endangered orcas, and people – and more must be done to prevent these waste streams from harming our communities and aquatic ecosystems. We need to minimize these pollutants to the maximum degree possible. For PBDEs, the Department of Ecology should require contractual agreements with each of the plant's industrial users which will include quarterly monitoring of PBDE discharges. The Department of Ecology should also require concrete steps to be taken in order to reduce these discharges. For PFAS contamination, permits should establish deadlines for industrial users to conduct initial sampling and reporting. There must be the implementation for monitoring of PFAS and for pollution prevention and reduction practices. The permit should also require that industrial users conduct EPA-recommended ongoing quarterly sampling. Additionally, each permit should require the plant itself to evaluate strategies to reduce PFAS if source control efforts aren't sufficient to reduce PFAS levels. For nutrient pollution, the permit should set limits on the levels of nitrogen and phosphorous that can be discharged. Scientists have already established limits that are are achievable. Using these standards will help address Puget Sound's persistent nutrient pollution problems – Everett and Ecology just need to listen to the experts. This should not be a political decision--it must be based on science. The Department of Ecology has an opportunity, through the renewal of this permit, to do more to protect our marine environment, salmon, orcas, and people. Washington State can become a leader in these efforts by issuing a permit that will reduce our exposure to these pollutants. State agencies need to work for "the people" and NOT for Big Business interests.