

David Pedersen

Dear Ms. Miller,

I am a Canadian environmental advocate who shares the Georgia Strait - Puget Sound watershed with your state. Accordingly, I am writing to you today to encourage you to implement the strongest-possible measures in the Washington Pollutant Discharge Elimination System (WPDES) permit for the Everett Wastewater Treatment Plant to ensure efficiency in the reduction (and, ideally, removal) of discharges of PBDEs (polybrominated diphenyl ethels), PFAS (per- and poly-fluoroalkyl substances), nutrients, and other pollutants.

Wastewater treatment plants are a primary source of these pollutants. In Puget Sound, high levels of PBDEs have been found in salmon, orcas, and even human breast milk. PFAS and nutrient pollution are pervasive nationwide, including in our beloved waterways. PFAS are particularly problematic because they almost never break down - hence their common name "forever chemicals".

The science is clear on this matter – these pollutants are harming federally-listed (under the Endangered Species Act) salmon and orcas, and people – and more must be done to prevent these waste streams from harming our communities and aquatic ecosystems.

For PBDEs, your agency should require that pre-treatment agreements with each of the plant's industrial users include quarterly monitoring of PBDE discharges and concrete steps to reduce these discharges as well as contingency measures for any exceedances, overflows, or spills.

For PFAS contamination, the permit should set deadlines for industrial users to conduct initial sampling and reporting, and to implement monitoring and pollution prevention and reduction practices. The permit should also require that industrial users conduct EPA-recommended ongoing quarterly sampling. Further, the permit should require the plant itself to evaluate strategies to reduce PFAS if pre-treatment efforts prove to be insufficient to reduce PFAS discharges.

For nutrient pollution, the permit should set limits, based on the best-available technologies and operational practices, on the levels of nitrogen and phosphorous that can be discharged. Scientists have already established limits that are achievable and will help address Puget Sound's persistent nutrient pollution problems – Everett and your agency simply need to listen to the experts and act based on their expertise.

Your agency has an opportunity through the renewal of this permit to do more to protect our marine environment, salmon, orcas, and people. I hope your state will become a leader in these efforts by issuing a permit that will reduce everyone's exposure to these pollutants.

Thank you for your time and consideration.

Regards,

David Pedersen

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