

Ellen Zarter

I am surprised that I have to ask you to take action at the Everett Wastewater Treatment plant. You should be doing this as a matter of routine. Nevertheless, I encourage you to implement strong measures in the wastewater discharge permit for the Everett Wastewater Treatment Plant that will be effective in reducing harmful discharges of PBDEs, PFAS, and nutrient pollution. Wastewater treatment plants are a primary source of these pollutants. 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 beloved 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. For PBDEs, Ecology should require that pretreatment agreements with each of the plant's industrial users include quarterly monitoring of PBDE discharges and with concrete steps to reduce these discharges. 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 source control efforts aren't sufficient to bring PFAS levels down. 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 achievable and will help address Puget Sound's persistent nutrient pollution problems – Everett and Ecology just need to listen to the experts. 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. We hope Washington State can become a leader in these efforts by issuing a permit that will reduce our exposure to these pollutants.