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I appreciate the opportunity to comment on the proposed Fresh Fruit Packer General Permit.

Ecology states that the permit is intended to protect local water, workers, and communities while supporting Washington's agricultural industry. I support those objectives. My comments focus on whether several provisions of the proposed permit provide sufficient information and monitoring to ensure those protections are achieved.

****Emerging Contaminants****

Condition S-4 appears to defer monitoring for PFAS compounds and 6PPD-quinone until 2028. Both contaminants have received increasing attention because of their persistence in the environment and their potential effects on aquatic ecosystems. In particular, 6PPD-quinone has been associated with significant impacts on salmonids.

If Ecology believes these contaminants warrant monitoring beginning in 2028, the permit record should explain why monitoring is not required earlier in the permit term. Ecology should evaluate whether earlier monitoring would be appropriate, particularly for facilities located near fish-bearing waters, wetlands, or shallow groundwater.

****Groundwater and Land Application****

The permit regulates discharges to both surface water and groundwater. Condition S-5 appears to exempt certain land application activities from permit coverage. While land application may not constitute a direct discharge, contaminants applied to land can migrate through soils to groundwater or reach nearby ditches, wetlands, streams, and other waters through runoff or shallow subsurface flow.

The permit and fact sheet should more clearly explain how these pathways are evaluated and what safeguards are in place to prevent impacts to groundwater and surface waters.

****Location-Specific Environmental Risk****

Environmental risk varies substantially depending on facility location. Facilities adjacent to fish-bearing streams, drainage ditches connected to streams, wetlands, floodplains, or areas with shallow groundwater may present different risks than facilities located farther from sensitive resources.

I encourage Ecology to require applicants to identify nearby surface waters, drainage features, wetlands, and groundwater conditions as part of permit coverage. This information would help Ecology evaluate whether additional monitoring or protective measures are warranted at particular sites.

****Temperature Monitoring****

Condition S-8 appears to rely on discrete temperature measurements. Because water temperatures

can vary substantially throughout the day and across seasons, continuous monitoring may provide a more accurate assessment of thermal conditions and potential impacts to receiving waters.

Ecology should evaluate whether continuous temperature monitoring would provide better information for protecting aquatic resources.

****Upsets and Unplanned Discharges****

The permit recognizes that upsets and other unplanned discharges may occur. While such events cannot always be prevented, the permit should emphasize prevention, rapid response, and reporting requirements designed to minimize impacts to water quality, aquatic life, workers, and nearby communities.

****Pollutants and Environmental Effects****

The permit and fact sheet describe regulatory requirements but provide relatively little discussion of the environmental significance of pollutants associated with fruit packing operations. The fact sheet would be strengthened by a clearer explanation of how pollutants of concern may affect aquatic ecosystems, groundwater resources, and beneficial uses of water, as well as how permit conditions are intended to prevent those impacts.

Ecology states that this permit protects local water, workers, and communities. I encourage Ecology to strengthen monitoring requirements, improve transparency regarding contaminant risks, and provide additional protections where facilities are located near sensitive aquatic resources. These improvements would help ensure that the permit fulfills its stated purpose while continuing to support Washington's important fruit industry.

Thank you for the opportunity to comment.