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**RE: COMMENTS ON UPLAND FIN-FISH HATCHING AND REARING GENERAL PERMIT AND ASSOCIATED FACT SHEET**

The following comments on the draft Upland Fin-fish Hatching and Rearing General NPDES Permit and associated Fact Sheet issued by the Washington Department of Ecology are being submitted on behalf of the Spokane River Regional Toxics Task Force (Task Force).

The Task Force is an organization of diverse stakeholders working to address toxics in the Spokane River. Ecology, the U.S. EPA, NPDES permittees, the Department of Health, and local conservation groups have formed the Task Force to develop an efficient and effective plan to reduce PCBs and other toxics in the Spokane River system.

The purpose of the Task Force is to “work collaboratively to characterize the sources of toxics in the Spokane River and identify and implement appropriate actions needed to made measurable progress towards meeting applicable water quality standards for the State of Washington, State of Idaho, and The Spokane Tribe of Indians and in the interests of public and environmental health.” This is a complex and multifaceted issue with no simple solution, but the Task Force is dedicated to a collaborative process that will result in a reduction of toxics to the Spokane River.

The Upland Fin-fish Hatching and Rearing General Permit conditions are very relevant to the overall objectives of the Task Force. Thank you for the opportunity to provide comment. Please feel free to contact members of our organization if you have questions or require clarification.

**Specific Comments**

1. **The permit and associated fact sheet should recognize that fish hatcheries are potential sources of PCBs to receiving waters and sediments, and that the hatchery fish themselves can be a source of PCBs in waters of the state.**
2. **The permit should require that hatcheries monitor effluent for all constituents with a reasonable potential to contribute to a water quality impairment in segments of a receiving waterbody with a 303(d) listing, including PCBs in cases where a hatchery discharges to a PCB listed waterbody.**
3. **The permit should require sampling of fish food and require implementation of BMPs (Best Management Practices), in accordance with sampling results, to reduce sources of PCBs in fish food for all fish life stages.**
4. **The permit requires a paint and caulk removal plan that allows a Toxic Substances Control Act (TSCA) exception for paints or caulk that are known to be less that 50 ppm. Please remove the reference to the TSCA allowance and the 50 ppm. Paints and/or caulk at the “allowable” TSCA level of 50 ppm have the potential to further impair 303(d) listed receiving waters.**