



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N, Olympia, WA 98501-1091 • (360) 902-2200 • TDD (360) 902-2207  
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

March 7, 2017

John McNicol  
Cargill/EWOS  
7721 132nd  
Surrey, Canada V3W 4M8  
John\_mcnicol@cargill.com

**Re: Fish Feed Supplier PCB Reporting Requirements**

Dear Mr. McNicol,

The Washington Department of Fish and Wildlife (WDFW) has received a new Upland Fin-fish Hatching and Rearing National Pollutant Discharge Elimination System (NPDES) General Permit from the State Department of Ecology (DOE). In order to meet permitting requirements, WDFW is requesting that you send any PCB testing results that you currently have on hand. Please include the size and type of feed tested as well as the testing method and results. Additionally, we will be working with you to develop a testing schedule, timing and which products are tested. Going forward, WDFW will begin including language in our Fish Feed contracts to address Polychlorinated Biphenyls (PCB) reporting requirements to be supplied by fish feed suppliers. Per DOE:

*“Facilities listed on the 303(d) list for PCBs must develop and implement a plan to reduce PCBs in the facility discharge, from fish feed and feeding activities. For state-run facilities, Permittees must comply with RCW 39.26.280(2) that prohibits a state agency of knowingly purchasing products containing PCBs above quantitation levels unless it is not cost effective or feasible to do so. The must submit the plan to Ecology by March 1, 2017. New Permittees must submit the plan within 60 days of permit coverage.*

*The plan must contain the following elements, at a minimum:*

- a. Purchasing procedures that give preference for fish food that contains the lowest amount of PCBs that is economically and practically feasible.*
- b. Fish feeding practices that minimize the discharge of unconsumed food.*
- c. Methods to reduce and remove accumulated fish feed regularly to keep feed out of the discharge.*
- d. Permittees must request PCB content information from fish food suppliers and include this in the Best Management Practices Plan.”*

Thank you for your prompt attention to this matter. Please send any PCB testing results and related documentation to the following address by March 30, 2017.

WDFW – Fish Program  
Attn: Eric Kinne  
600 Capitol Way N  
Olympia, WA 98501

Sincerely,



Eric Kinne  
Hatchery Systems Manager  
WDFW

Cc: Theresa Walker, WDFW, [Teresa.walker@dfw.wa.gov](mailto:Teresa.walker@dfw.wa.gov)  
Greg Bonacker, Cargill/Ewos, [Gregg\\_bonacker@cargill.com](mailto:Gregg_bonacker@cargill.com)  
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