

# The Columbia Basin

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### FEEDBACK: IDAHO AND FISH CONSUMPTION RATES

Posted on Friday, August 02, 2013 (PST)

Feedback: Idaho And Fish Consumption Rates

Re: CBB, July 26, 2013, "Groups Give Notice To Sue Over 'Failure To Promulgate' Water Quality Standards In Washington State"

<http://www.cbbulletin.com/427626.aspx>

-- From Don A. Essig, Water Quality Standards Coordinator, Idaho DEQ

I read with interest the story in the recent issue of CBB regarding recent notice to sue EPA over Washington's human health criteria for toxic substances.

About halfway through the article it is stated "However, Washington and Idaho continue to use the lower rate of 6.5 grams per day ...".

That is not entirely accurate. Idaho adopted a fish consumption rate of 17.5 g/day in 2005 as part of a human health criteria update. EPA disapproved our adoption of their recommended default rate, as they did in Oregon, but not until May of 2012. The 17.5 g/day rate is still on Idaho's rule books, although not approved for Clean Water Act purposes due to EPA's action.

Since EPA writes NPDES permits in Idaho it is EPA who would use the lower rate they put in effect. Although not tested, as there are very few permits with effluent limits for the toxins in question, Idaho would likely not be able to certify EPA's use of 6.5 g/day as meeting Idaho water quality standards.

It is interesting to me to read a story like this and others in the press recently and see fish consumption rates tossed out – 6.5 g/day, 17.5 g/day, 175 g/day, 205-280 g/day, 796 g/day – with never a mention of what they represent – a mean, median, 90th percentile, 95th percentile, 99th percentile, and of whom. They could all be from the same distribution, or not, maybe comparable,

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maybe not, and your readers would be none the wiser.

The real questions at play here are what it means to be protected, what level of risk is acceptable, and then what consumption rate, out of a vast range of rates, represents that level of protection. While accurately characterizing fish consumption rates is part of the issue, a much bigger issue is the policy decision about the level of protection to be provided, and who makes that decision.

Don A. Essig

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