



Northwest Pulp & Paper
ASSOCIATION

VIA E-mail

April 22, 2014

Paula Wilson
IDEQ State Office
Attorney General's Office
1410 N. Hilton
Boise, ID 83706

***RE: Docket No. 58-0102-1201 - Negotiated Rulemaking
Idaho's Fish Consumption Rate Probabilistic Risk Assessment Method***

Dear Ms. Wilson:

On behalf the Northwest Pulp & Paper Association (NWPPA), please accept this comment letter to the Idaho Department of Environmental Quality (IDEQ) regarding the above-referenced rulemaking process. NWPPA supports the IDEQ's work and efforts to provide the best Idaho-based science in completing the review of Idaho's fish consumption rates and subsequent promulgation of new water quality standards. We appreciate the opportunity to comment on this rulemaking as it proceeds.

NWPPA represents pulp, paper, packaging and forest products companies that have manufacturing and distribution operations in the state of Idaho. NWPPA is also involved in a similar rulemaking process in the state of Washington and is providing comments and assistance to Northwest states in support of regulations that: (a) are based on sound scientific principles; (b) are economically and technically feasible; and (c) can be practically implemented within the federal Clean Water Act (CWA) and the IDEQ's regulatory framework (recognizing that EPA Region 10 currently administers the NPDES permit program).

We write to you today in support of an assessment process that is technically sound, used in many research functions, represents the best science in assessing risk, would represent all Idaho fish consumers, facilitates transparency in HHWCQ rulemaking, and inherently calculates the risk to all Idahoans. That assessment process is known as the Monte Carlo method and has also been called the "Probabilistic Risk Assessment Method" (PRA).

Dr. Paul Anderson of ARCADIS presented this method at the April 2nd IDEQ rulemaking meeting. We believe that this method offers the best avenue of determining risk and updating Idaho human health water quality criteria. PRA is the best available science, it assesses the risks of all Idahoans, and avoids compounding (double-counting) of the inherent conservatism found in the Deterministic method. It also

provides for transparency—everyone will be able to see the science and data collected and provide real input in to the policy decision making process. When IDEQ completes their fish survey work, the results can readily be seen for what they are, and then statistically combined to model the entire State. The output will be a distribution of fish consumption that can then be developed for the entire state. This will lead to a more accurate assessment of fish consumption and consequently a more scientifically accurate risk assessment. Once that is known, a more accurate HHWCQ standard can be implemented.

We urge you and IDEQ to select and implement use of the Probabilistic Risk Assessment Method in the IDEQ's efforts to update new HHWCs for Idaho.

Thank you again for providing the opportunity for comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Christian McCabe". The signature is fluid and cursive, with the first name "Christian" written in a larger, more prominent script than the last name "McCabe".

Christian McCabe
Executive Director
Northwest Pulp & Paper Association