

From: Cook, Cyrilla (DNR)
Sent: Monday, August 22, 2011 1:14 PM
To: Dewell, Jane (ORA)
Cc: Clark, Dennis (DNR); CARTEN, TERRY (DNR)
Subject: RE: GPT MAP Team - Review draft Sediment Implementation Plan

Hi Jane

DNR technical staff has completed the review of the Sediment Implementation Plan for 2011. We concur with the two sets of comments and recommendations provided by Ecology. We are pleased that baseline information on PAHs will be collected because they are present in coal. We share Ecology's concerns regarding comparability in Section 6.2.4. We agree it is critical that larval assays use the same species to the best ability of the labs. Accurate ambient toxicity studies are particularly important in assessing potential impacts of environmental contaminants on herring and other species. Ambient water toxicity studies are a requirement of the Cherry Point Environmental Aquatic Reserve Management Plan as a condition of authorization of any new discharge outfalls from the project, excerpted below:

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Conduct ambient water toxicity study using protocols accepted by EPA and Ecology to evaluate cumulative effects of existing industrial wastewater outfalls and groundwater seeps on nearshore species survival and water quality. Caged mussel studies and/or harbor seal bioassays may be used as biological indicators of toxicity. Caged mussel studies and/or harbor seal bioassays may be used as biological indicators of toxicity. Study design may be based on similar study required by Herring Agreed Order # 3192. Project proponent may coordinate study with existing authorized uses that are also required to conduct ambient water toxicity study, as identified in Additional Reauthorization Requirements Related to Discharge Outfalls section above.

Assess bioaccumulation of PAH, PCB, and heavy metals in caged mussels as described by Applied Biomonitoring, 2002.

Cyrilla Cook, AICP
Policy Unit Supervisor
Aquatic Resources Division
Washington State Department of Natural Resources (DNR)
360-902-1080
cyrilla.cook@dnr.wa.gov
www.dnr.wa.gov