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[deadline for submission is May 26, 2023]

May 25, 2023

Via Electronic Delivery: Nickel.Brian@epa.gov

Ms. Susan Poulsom and Mr. Brian Nickel
Water Division, NPDES Permitting Section
US EPA Region 10
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

Subject: Public Notice Comments: NPDES Permit No. WA0050202
Washington Beef, LLC - Toppenish Plant

Dear Ms. Poulsom and Mr. Nickel:

I am writing to express my deep concern that newly proposed regulations for the Washington Beef processing plant in Toppenish, WA may negatively impact our region here in Eastern Washington. I appreciate that the Environmental Protection Agency has an important role to play in addressing water discharge issues, but those efforts should not be directed at a good actor that has coexisted with and supported our community since XXXX. Washington Beef is a valued neighbor and responsible environmental steward. Their consistent effort to implement best practices and maintain a sustainable operation has paid off as I understand the EPA has not cited violations or other problems with water quality to support the significant changes being proposed.

In addition to their strong environmental record, Washington Beef has also supported numerous local organizations and initiatives. As a business owner I have seen firsthand the significant role they play in the area, a role which will be jeopardized by EPA imposing new regulations which far exceed the current Tribal water quality standards that have successfully protected the Toppenish community while allowing our economy to flourish.

I'm also concerned these new regulations are being applied to Washington Beef outside of the normal federal rulemaking process, and without adequate public input. Our community has too much at stake to handle this issue through a rushed process.

Washington Beef has been an important employer in our region for many years, providing stable and well-paying jobs to thousands of local workers, nearly all of whom are residents of Yakima County, WA, and supporting countless indirect jobs in our region and throughout the state. These jobs generate tens of millions of dollars in annual wages, disbursements, and employer paid benefits in an area of our state that will struggle to replace this economic output if Washington Beef is forced to close or relocate its plant because of the proposed regulations.

EPA's proposed changes in applicable water quality standards, which seem to be both unattainable and unnecessary put Washington Beef and the Washington economy at risk. The

loss of such a vital employer and contributor to Yakima County would have far-reaching consequences for our community and our State.

Beyond the impact on employment and the local economy, we would lose a critical community partner that has been committed to making our region a better place to live, work, and do business. I urge you to reconsider the draft Permit and work with Washington Beef to identify more sustainable solutions in line with how the facility has been regulated historically. This would continue to protect our environment while also preserving the economic and social benefits that the company provides to our community.

Thank you for the opportunity to submit these comments relating to Washington Beef's NPDES Permit, which are intended to be part of the Administrative Record. Please consider my views on this important issue.

Sincerely,

Dan Probert
Chief Executive Officer
Country Natural Beef