



North American Metals Council  
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April 29, 2015

Via Regular Mail

Governor Jay Inslee  
Office of the Governor  
P.O. Box 40002  
Olympia, WA 98504-0002

Re: Zinc Prioritization in Washington State

Dear Governor Inslee:

The North American Metals Council (NAMC), as a member of the Zinc Coalition, wishes to highlight our scientific concerns regarding the Washington State Department of Ecology (Ecology) prioritization and environmental assessment for zinc. NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American “metals industry”) on science- and policy-based issues that affect metals in a generic way. We are engaged with the Zinc Coalition given NAMC members’ concerns that the action on zinc is scientifically unfounded and could have larger adverse consequences for other metal substances.

NAMC urges your office to meet with the Zinc Coalition as quickly as possible to discuss and identify a mechanism for the zinc industry to contribute best available science to the prioritization and assessment process. Appended is a briefing paper that outlines our concerns with the scientific methods used to prioritize zinc as a “toxic threat” in Washington State and how this characterization does not align with the status of environmental assessment methodologies for zinc by the U.S. Environmental Protection Agency (EPA), and other international authoritative bodies. In particular, three important considerations warrant a reassessment and reprioritization of zinc:

1. Considerations for zinc’s natural occurrence and essentiality are lacking.
2. The technical basis of Ecology’s water quality assessment of zinc is nearly 30 years old.
3. Ecology-sponsored research designed to address uncertainties related to zinc loadings from roof runoff has been ignored.

Given the trajectory of House Bill 1472 for identifying and conducting Chemical Action Plans starting in **January 2016**, we believe an immediate meeting is reasonable and appropriate. Thank you in advance for your consideration of our request.

Sincerely,

Kathleen M. Roberts  
NAMC Executive Director

Attachment

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