



North American Metals Council  
Managed by B&C® Consortia Management, L.L.C.

September 15, 2016

Via Online Submission

Oregon Department of Environmental Quality  
811 SW Sixth Avenue  
Portland, OR 97204

Re: Proposed Rulemaking -- Aquatic Life Water Quality Standards for  
Copper

Dear Sir or Madam:

The North American Metals Council (NAMC)<sup>1</sup> is pleased to submit this letter in support of the comments submitted by the Copper Development Association (CDA) on the proposed rulemaking from the Department of Environmental Quality (DEQ) to establish aquatic life water quality standards for copper in Oregon.

NAMC strongly supports the DEQ methodology in prioritizing site-specific data for application of the Biotic Ligand Model (BLM), which represents the best scientific approach for metals risk assessment, in the Oregon proposed water quality standards for copper. Like CDA, NAMC is pleased with DEQ's use of a performance-based standards approach for regulatory implementation of the BLM. By remaining consistent with existing regulatory frameworks for implementing water quality-based aquatic life criteria, DEQ will help facilitate implementation of the BLM, and still provide the most accurate levels of aquatic life protection.

NAMC also supports the specific recommendations and clarifications offered by CDA regarding the specific technical implementation steps for the proposed standard.

Thank you for the opportunity to comment.

Sincerely,

Kathleen M. Roberts  
Executive Director, NAMC

---

<sup>1</sup> 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. NAMC members include trade associations as well as individual companies.