

Quincy-Columbia Basin Irrigation District

Telephone (509) 787-3591 Fax (509) 787-3906

Post Office Box 188

Quincy, Washington 98848

DEPARTMENT OF ECOLOGY

March 19, 2012

MAR 21 2012

WATER QUALITY PROGRAM

Ms. Laurie Morgan
Washington State Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98505

RE: Draft Irrigation System Aquatic Weed Control National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit; Permit No: WAG0991000

Dear Ms. Morgan:

The Quincy-Columbia Basin District appreciates the opportunity to comment on the draft Aquatic Weed Control NPDES General Permit.

We supply irrigation water to more than 4,200 landowners and 248,000 acres through 96 miles of canal and 893 miles of laterals.

Geographic areas covered under S2 identify permit coverage exclusions which include "federal facilities," but neither the fact sheet nor the draft permit defines federal facilities. The Quincy District would like Ecology to clarify these definitions and incorporate them into the permit and fact sheet.

Flow studies covered under S6.C require that studies be less than five years old. Irrigation canals and laterals are manmade controlled facilities that are not subject to environmental factors which may affect travel times in free flowing natural waterways. Irrigation canals experience variations in travel times caused by aquatic weed growth, farm deliveries, storm events, and agricultural return flows that vary from day to day. Factors to account for these variations are already incorporated into permit requirements which include required sampling frequencies and windows.

It is unnecessary to repeat flow studies every five years unless known significant alterations occur which may invalidate historical data. The Quincy District suggests the following language for S6.C.5 of the NPDES General Permit:

"The permittee must support all monitoring by completing a time travel study at each application site and must obtain new time travel studies if significant change occurs which may alter historical flow studies."

Further restrictions on Magnacide H (acrolein) detailed in S5.7 could be damaging to our business and farm economies. The Quincy District has used acrolein since 1969 and depends on this exclusive product to increase flow efficiency by eliminating aquatic weeds and algae. Aquatic weeds reduce the carrying capacity of canals by clogging the cross-section of the canals, turnouts, and pumps which increases the likelihood of dangerous canal overflows and breaks by choking their cross section.

Ms. Laurie Morgan
Page 2
February 22, 2012

The Quincy District has created a vegetation management plan largely around the assumption of continued use of acrolein. Since 1969 much has been learned about the application of the herbicide, its efficacy, and our ability to contain the product within our irrigation system. We have made considerable investments in equipment to transport the product, personal protective equipment to apply the product, and monitoring and lab equipment to assure the product is used responsibly. We have also invested heavily in our employees' training to assure the product is handled and applied safely.

We are pleased with Ecology's efforts to modify and renew the Aquatic Weed Control NPDES Permit.

If you have any questions about these comments, please contact me at (509) 787-3591.

Sincerely,



Craig Gyselinck
Water Quality Programs Manager

Cc: Darwin Fales – QCBID Manager
Troy Freeman – QCBID O&M Assistant Manager