

From: [Donald J Russell](#)
To: [Hamel, Kathy \(ECY\)](#)
Cc: Pondweeds@comcast.net
Subject: Clarification regarding my NPDES comments
Date: Tuesday, October 05, 2010 7:35:30 AM

Kathy,

In my handout comments I referred to provision S11 Conditional Approval for the Use of Products Not Specified in the Current Permit. I was responding to a provision in the March 1, 2006 Aquatic Plant and Algae Management General Permit that expires on April 1, 2011 and not the Draft September 1, 2010 Aquatic Plant and Algae Management National Pollutant Discharge Elimination System State Waste Discharge General Permit. Apparently this onerous, costly and time consuming S11 provision to which I objected in my paper has been deleted from the proposed new Permit. So temper my handout comments accordingly. I am OK with the *Experimental Use* provision that has been included in the Fact Sheet for the Aquatic Plant and Algae Management NPDES General Permit.

I still believe that nutrient inactivation products and treatments should have the stigma of being considered pollutants and acts of pollution removed since many in the general public equate the addition of any "chemical" to a lake as an act of pollution, when the intent of nutrient inactivation is to bring the chemistry of a lake into compliance with state surface water quality standards and thus restore the natural function and value of "their" lake. This "your lake is about to be polluted" notion is reinforced by all the public notices and signage that goes up in advance of a nutrient inactivation treatment. It only takes a few misinformed "environmental activists" to arouse the citizens and thereby thwart the very act that will restore the beneficial use of an phosphorus impaired lake. We need to avoid "bad press" if we are to engage in serious and effective lake restoration work.

Don