

Valent, U.S.A. Corporation  
Registration & Regulatory Affairs  
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October 14, 2010

Kathy Hamel  
Water Quality Program  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

RE: Draft Aquatic Plant and Algae Management National Pollutant Discharge  
Elimination System State Waste Discharge General Permit

Dear Ms. Hamel:

Valent U.S.A. Corporation is submitting comments on the Draft Aquatic Plant and Algae Management National Pollutant Discharge Elimination System State Waste Discharge General Permit, which was issued by the Washington Department of Ecology on September 1, 2010. We request the agency give careful consideration to our comments.

**Statement of Interest**

Valent U.S.A. Corporation is a producer and supplier of specialty pesticide products to the agricultural and professional markets, including herbicides (which include aquatic herbicides), insecticides and fungicides. Valent U.S.A. Corporation and our customers are impacted by any changes to the Aquatic Plant and Algae Management National Pollutant Discharge Elimination System State Waste Discharge General Permit (Permit) in the state of Washington.

**Specific Comments on the DRAFT General Permit**

In the Draft General Permit on pages 14 through 18 under S4. THE APPLICATION OF PRODUCTS B. Authorized Discharges the Washington Department of Ecology provides a specific list of chemicals authorized for use in state waters.

We believe this is a mistake. Including a specific list of pesticide active ingredients, adjuvants and other chemicals approved for use in the General Permit is problematic as the General Permit would have to be revised via rulemaking to add new active ingredients, adjuvants and other chemicals to the list.

NPDES General Permits are typically reviewed and revised every five years. Aquatic applicators in the state of Washington should not have to wait five years to use new chemistries, new pesticide or adjuvant products while the General Permit goes through the rulemaking process.

October 14, 2010  
Page Two

We would recommend that you remove the list from the General Permit and insert a web link to the approved list of active ingredients, adjuvants and other chemical approved for use in Washington State that you maintain on your website. This would allow aquatic applicators in the State of Washington faster access to new products and new chemistry because the approved list could be amended by the Department of Ecology at any time

If you have any questions concerning our comments please do not hesitate to contact me.

Sincerely,



Julie B. Schlekau  
Federal Registration Manager  
Registration and Regulatory Affairs  
Valent U.S.A. Corporation