

EAST COLUMBIA BASIN IRRIGATION DISTRICT

55 North 8th
P.O. Box E

OTHELLO, WASHINGTON 99344

Phone 509 488 9671

Fax 509 488 6433

March 19, 2012

Ms. Laurie Morgan
WA Dept. of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504

Subject: Draft NPDES Permit Comments

Dear Ms. Morgan:

The East Columbia Basin Irrigation District has the following comments on the Draft NPDES Permit.

(Page 5) S5.B.1 – The discharge of any pollutant listed in S5.B4 should read S5.B3.

(Page 6) S5.B.5 – The Experimental Use requirements need to be explained better. It is not clear if a federal permit is required with a WSDA permit or just a WSDA permit.

(Page 7) S5.B.6.a – Endothall concentrations are being increased for the next permit phase. Please clarify if an additional general plan needs to be resubmitted.

(Page 8) S5.B.7 – If acrolein could be phased out, it would be beneficial for the environment. However, the Columbia Basin Project was developed to deliver water to irrigated farm land and until a product or products are developed that may replace it, acrolein will need to remain on the list of approved and registered aquatic herbicides to alleviate any conditions that may arise during an irrigation season and insure water delivery. Water quality is affected by light, air and water temperatures. These factors all have an influence in determining the course of action taken by the District to control aquatic weeds and algae.

New products are beginning to be developed for aquatic weed control in constructed waterways that are more environmentally friendly. These products have provided some benefit in the eradication of aquatic weeds and algae. However, the jury is still out in regards to defining the absolute product(s) that will replace acrolein. It is important to have all available technology at our disposal to eliminate aquatic weed problems that may be encountered during the irrigation season.

(Page 11) S7 – The Integrated Vegetation Management Plan was submitted during the last permit cycle. Does this section require only updated information or should the entire plan be resubmitted for approval?

(Page 12) S9.A and S.B – The Spill Control Plan was submitted during the last permit cycle. Does this section require only updated information or should the entire plan be resubmitted for approval?

(Page 12) S10.A.4 and S10.A.5 – For clarification: does this require submitting published notice to newspapers to Ecology twice? Once pre-season and again in the final report due February 1st of the following year?

Ms. Laurie Morgan
February 29, 2012
Page 2

(Page 14) S11.A.1.b. – This section states that DMR's for each month must be postmarked or received by the 25th day of the following month. This request can present somewhat of a hardship when the District is busy during peak water deliveries and herbicide applications are numerous. Lab results typically have a 10 to 14 day turn around at the onset of the season, however during peak season it is not uncommon to experience a 21 day turn around before results are received. Having an additional 5 days to report would alleviate the problem of reporting end of month samples on the following month DMR.

(Page 14) S11.A.1.c. – Does this require that DMR's be sent in monthly for the entire year? The previous permit required Districts to submit monitoring results monthly for the treatment months of April through October whether or not the permittee applied herbicides or discharged treated water.

Irrigation water flows from mid-March to mid-October. The East District does not make any herbicide applications when water is not in the ditch. If DMR's have to be submitted, is it possible to send in one DMR with November 2012 to March 2013 stating no applications? It is understood that if an application were made, a DMR reflecting that would be submitted.

Thank you for the opportunity to comment on the Draft NPDES Permit.

Sincerely,



Elayne M. Fuller
Water Quality Supervisor

EMF:wI

cc: Craig Simpson

Morgan, Laurie (ECY)

From: Elayne Fuller [efuller@ecbid.org]
Sent: Monday, March 19, 2012 2:41 PM
To: Morgan, Laurie (ECY)
Subject: Draft NPDES Permit Comments
Attachments: Draft NPDES Permit Comments Letter.pdf

Categories: Irrigation District Permit

Hi Laurie,

Comments on the Draft NPDES Permit are attached.

Elayne M. Fuller
Water Quality Supervisor
East Columbia Basin Irrigation District