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Trentwood Works

DEPARTMENT OF ECOLOGY

NOV 17 2010

WATER QUALITY PROGRAM

November 12, 2010

Ms. Becca Conklin
Department of Ecology
Surface Water Quality Standards
PO Box 47600
Olympia, WA 98504-7600

RE: Triennial Review Comments

Dear Ms. Conklin:

As a follow-up to the public meeting and hearing on the Triennial Review of Water Quality Standards that was held in Spokane on November 9, 2010, Kaier Aluminum respectfully submits the following comments.

Comment

The Department of Ecology should develop site specific surface water quality standards on a priority basis for those surface waters for which are or are likely to be identified as impaired water bodies. These waters should be a priority because eventually a Total Maximum Daily Loading (TMDL) will need to be developed for them so that the water quality standard is complied with. Compliance with the requirements of a TMDL results in a significant amount of spending by both the private and public sectors that discharge a identified water body. By developing site specific surface water quality standards in these types of water bodies on a priority basis, TMDLs would be addressing standards that are protective of the uses that truly exist with respect to these water bodies. This approach would minimize wasteful spending that would be made in pursuit of trying to achieve inappropriate standards. The level of effort and expense to develop site specific standards for these waters on a priority basis would be minimal as compared to the resources that would be wasted on protecting non-existent uses.

Comment

The Spokane River should be a priority for the development of site specific surface water quality standards.

Kaiser Aluminum appreciates the opportunity to comment on Ecology's Triennial Review of its surface water quality standards.

If you should have any questions, please feel free to contact me at (509) 927-6554.

Sincerely,

Bernard P Leber, Jr.