From: Terry Jackson <TAJackson@dfg.ca.gov>
To: James Marshall <jdmarshall@waterboards.ca.gov>
CC: William Cox <WTCOX@dfg.ca.gov>
Date: 12/12/2011 5:08 PM
Subject: DFG COMMENTS: Cold Water CAAP General NPDES Permit Amendments

** High Priority **

RE: Waste Discharge Requirements for Cold Water concentrated Aquatic Animal Production Facility Discharges to Surface Waters, Order No. R5-2012-XXXX, Amending Waste Discharge Requirements Order No. R5-2010-0018, General NPDES No. CAG135001

Dear Mr. Marshall,

I appreciated the opportunity today with you to discuss numerous issues pertinent to the proposed Amendments, and better understand specific processes. Specific comments to the amendments watermarked as "Tentative Order 10 November 2011" are:

On Page 4 item 2, paragraph "a" and "b", grammatically the wording is not clear. Subsequent to the inserted text it would be clearer to me if it read "… pollutant concentrations in the discharge do not cause, do not have a reasonable potential to cause, or do not contribute to an excursion above any applicable …. "

On Page 7 item 9, paragraph "a", neither vibrio vaccine nor enteric redmouth bacterin are directly injected. Please replace the current language with: "vibrio vaccine (fish are removed via a basket and then dipped in vaccine and then returned to the raceway), enteric redmouth bacterin (fish are removed via a basket and then dipped in vaccine and then returned to the raceway)"

On Page 11 item 19, subsection "B" bottom paragraph, the language does not allow of intake credit in the event of priority pollutant metals in the intake being in excess of water quality screening levels listed in Attachment H. The current language would not allow the hatchery to discharge, even if the intake water exceeded the limits. Please modify the language to allow for intake credit and discharge allowance.

Although we discussed modifying the timelines for quarterly and annual reporting, I have opted to not seek modification at this time.

I look forward to continuing to work with you and your staff regarding water quality monitoring regarding our NPDES permits. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Terry Jackson

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