

Scott Cressey

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July 3, 2012

Phil Isorena
Water Quality Regulation Dept.
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Re: Comments on the June 27, 2012 Draft General NPDES Permit for Residual Aquatic Pesticide Discharges following Algae and Aquatic Weed Control Applications

Dear Mr. Isorena:

As an aquatic biologist who has prepared General NPDES permit applications and implemented the self-monitoring program in the past, I appreciate the opportunity to comment on the draft document noted above. In general, I believe this document is more detailed and easier to understand than the 2004 Fact Sheet for this type of permit. However, I have two comments.

1. Could you provide more detail as to the required number of pesticide residue samples to be taken in a flowing water habitat during the post-application monitoring (number of samples to be taken downstream of the pesticide application, and distance between samples).
2. Page C-6 (Table C-1) and page D-30 of the Fact Sheet state that “six consecutive application” events need be monitored per year (except for glyphosate), and then if the sample analysis results are within the receiving water’s limitations for that chemical, sampling shall be reduced to one application event per year for that chemical and setting. Can this requirement drop the word “consecutive” and simply require that six application events be monitored? This would greatly facilitate the monitoring process. Should one monitor the first four application events, then miss the 5th application event for whatever reason, one could not sample the next two application events to achieve the required six consecutive monitored applications, but would have to start over. If a minimum of six application events must be monitored in a season to be representative of the applications, it shouldn’t have to be consecutive events to achieve this.

Sincerely,

A handwritten signature in blue ink that reads "Scott Cressey".

Scott Cressey
Consulting Fisheries Biologist