

# Quincy-Columbia Basin Irrigation District



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March 17, 2023

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WA State Department of Ecology  
PO Box 47696  
Olympia, WA 98504-7696

## **Subject: Draft Irrigation System Aquatic Weed Control General Permit**

Dear Ms. Edelman:

Please find attached Quincy-Columbia Basin Irrigation District's (QCBIID) written comments concerning the Draft Irrigation System Aquatic Weed Control General Permit, National Pollutant Discharge Elimination System, and State Waste Discharge General Permit, issued by State of Washington Department of Ecology on January 18, 2023.

These comments reference numerous sections of the draft permit. This draft permit has many issues that concern QCBIID. Our primary concerns are as follows:

- 1) Ecology is attempting to have this permit cover treatment of emergent vegetation which is out of scope with regards to aquatic weed control work being performed in irrigation canals. (S1 Permit Coverage)
- 2) Ecology is attempting to include in this permit education and outreach requirements that are beyond the scope of the Water Pollution Control Act and Clean Water Act. (S6 Best Management Practices)
- 3) Ecology has added provisions for new pictogram signage requirements while continuing the requirement for existing signage. Additionally, the new signage location and duration requirements which have been added are not workable from a practical means. (S6 Best Management Practices)

QCBIID supports comments being submitted by numerous other irrigation districts and Washington State Water Resources Association.

QCBIID recommends that Ecology consider making a decision on the general permit after November 2023 so there is no confusion on which permit applies during the 2023 irrigation season.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Roger Sonnichsen', is written over a blue line.

Roger Sonnichsen  
Secretary-Manager

Enclosure

cc: Dee Kukes, QCBIID Water Quality Manager

#### Page 4 Table of Contents S8. Reporting

The contents do not match the document. The following should be corrected as follows:

S8B. Annual Treatment Report page 40 to S8B. Reporting Results page 39.

S8C. Treatment Notifications and Public Notices page 40 to S8C. Annual Treatment Reports page 40.

S8D. Plans and Studies page 41 to S8D. Treatment Notifications and Public Notices page 40.

S8E. Reporting Noncompliance and Spills page 43 to S8E. Plans and Studies page 43.

S8F. How to Submit Documents to Ecology page 44 to S8F. Report Noncompliance and Spills page 43.

S8G. Other Changes to Permit Coverage page 45 to S8G. How to Submit Documents to Ecology page 44

S8G. Other Changes to Permit Coverage page 45 to S8H. Other Changes to Permit Coverage page 45

#### Page 7 Summary of Permit Reports and Submittals

Paragraph S5.B.6.b is not in the document.

Under the Fluridone Application Plan the frequency for reporting is blank. The frequency for reporting should be specified.

#### Page 8 and 9 Continuation of Summary of Permit Report

Does Ecology mean to indicate the reports and submittals are due on February 1<sup>st</sup> of the year following an irrigation season? Does Ecology mean that the Education and Outreach report is due February 1<sup>st</sup> of the following year, once plan is implemented?

#### Page 10 Special Conditions S1.A. Activities Covered Under This Permit

In the sentence, "Irrigation systems that flow to **fresh** surface waters of the State of Washington," "fresh" should be omitted.

This permit should continue to only cover aquatic weed control. The sentence, "This permit also covers the treatment of emergent vegetation on the banks of conveyances within the irrigation system," needs to be removed. QCBID's terrestrial spray program is conducted following WSDA and FIFRA labels, by licensed applicators. These applications are not **directly** sprayed into the water and are not needed to be covered under this permit.

#### Page 10 Special Conditions S1.C.2. Activities Excluded from Coverage Under This Permit

Ecology should clarify the need regarding the exemption of pesticide treatments applied to canals that do not flow through a Point of Compliance (POC) to waters of the state. There is confusion as far as notifying Ecology of treatments that do not flow through a POC. In the past, QCBID would notify Ecology of all treatments. On the reports, treatments with affiliated POCs are listed and treatments with no POCs would say "No Discharge." If treatments with no POCs are excluded, it is assumed that Ecology is only concerned about treatments that have affiliated POCs.

**Page 11 Special Conditions S2.A. Who May Obtain Permit Coverage**

Ecology should define in the glossary what a "water company" is as well as its purpose.

**Page 11 Special Conditions S2.B.1.d. How to Apply for Permit Coverage -Integrated Pest Management Plan**

Summary of Permit Reports and Submittals page 8 S6.E says "Integrated Aquatic Vegetation Management." Please change this to Integrated **Aquatic Vegetation Management Plan** on both for consistency.

**Page 12 Special Conditions S2.B.2. How to Apply for Permit Coverage – Special Condition S8.D (How to Submit Documents to Ecology)**

How to Submit Documents to Ecology falls under **S.8.G** page 44, the table of contents will need to be updated too.

**Page 13 Special Conditions S2.B.5. How to Apply for Permit Coverage -SEPA**

QCBID is part of a federal irrigation project and therefore follows NEPA requirements where required and not SEPA requirements.

**Page 13 Special Conditions S2.D. How to Modify Permit Coverage**

How to Submit Documents to Ecology is in S8.G, the table of contents will need updating as well.

**Page 14 Special Conditions S2.D.a. How to Modify Permit Coverage**

QCBID is concerned about Ecology's approval if there is a change that may impact the quality of treated water discharged, the area covered by the permit, or the location of a POCs. QCBID's operations and maintenance consist of system improvements on a yearly basis. Canals are piped, lined or panels are rebuilt to provide safety and efficiency for water delivery. Water users may construct holding ponds for water conservation used for frost control or cooling if needed. If Ecology is implying only the approval of a new POCs rather than system improvements and/or modification by QCBID, then the language should only address the approval of a new POC.

**Page 14 Special Conditions S2.E. How to Renew Permit Coverage**

Will need to change this to S8.G and in the table of contents as well.

**Page 14 Special Conditions S2.F. How to Transfer Permit Coverage**

Will need to change this to S8.G and in the table of contents as well.

**Page 15 Special Conditions S3.A.1.a., S3.A.1.b., S3.A.1.c., S3.A.1.d. Application and Discharge Standards**

Paragraph S3.A.1.a should be clarified to read as Surface Water Quality Standards.

The purpose of the permit is to control aquatic vegetation in SURFACE WATER within the irrigation system. Maintaining aquatic vegetation will affect DO levels.

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Surface water within the canal system is what is being treated and monitored under this permit. Paragraph S3.A.1.b and S3.A.1.c need to be removed as they don't pertain to purpose of this permit.

Ecology's reference to Human Health Criteria under paragraph S3.A.1.d needs to be removed as it is not consistent with Section S4 The Application of Products and Discharge Limits specified in this permit.

**Page 16 Special Conditions S3.A.2.g. Application and Discharge Standards**

QCBID is assuming that SOP stands for "Standard Operating Procedures." Ecology needs to clarify whose SOPs are needed in regards of the WDFW treatment timing windows.

**Page 16 Special Conditions S3.B. Temporary Exceedance of Water Quality Standards**

S3.A.1.a. says that Permittees need to ensure that we do NOT cause or contribute to a violation, however, this paragraph allows for short and long-term exceedance. Ecology needs to explain the allowances related to this paragraph.

**Page 16 Special Conditions S3.C. Application Requirements**

It appears that Ecology is stating its authority over pesticide application requirements, when in fact, Washington State Department of Agriculture (WSDA) is authorized to regulate pesticide activities in the state.

Ecology should eliminate paragraphs S3.C.1-3, to eliminate any confusion with regard to WSDA authority over application requirements.

**Page 16 and page 17 Special Conditions S3.D. Impaired Waterbodies**

The 303(d) list has not been finalized. QCBID is concerned once the list is finalized, the NPDES permit will be more restricted. Ecology should modify the sentence, "Permittees must prevent further impairment listed on the 303(d) list for dissolved oxygen as a result of treatment." The purpose of the permit is to control aquatic vegetation which will affect certain parameters by the decomposition of aquatic vegetation after a treatment.

**Page 18 Special Conditions S4.A. The Application of Products and Discharge Limits – Prohibited discharges**

The purpose of the permit is to control aquatic weed and algae within the canal system with approved herbicides. This will likely cause oxygen depletion during treatments. Aquatic vegetation grows increasingly fast during irrigation peak season which is during high temperatures. Most of the approved active ingredient labels state that the breakdown of aquatic vegetation can cause a depletion in oxygen levels. Ecology should consider modifying this paragraph.

**Page 18 Special Conditions S4.B., S4.B.1. and S4.B.3. Authorized Discharges**

Omit "emergent vegetation on banks of conveyances." Refer to comments regarding S1.A on page 10.

Omit "Fresh" in freshwaters for consistency or change to surface water of the State.

Ecology is permitting Acrolein at a concentration of 21 ug/L. Ecology should remove the special condition reference to S4.D.1a, as references to making reasonable efforts to reduce the use of acrolein in favor of more

environmentally sensitive pesticides, should be based on the Integrated (AQUATIC) Vegetation Management Plan.

**Page 19 Table 2: Active Ingredients to Control Aquatic Weeds and Algae**

Ecology should remove from Table 2 -Fluridone, imazapyr, diquat dibromide, flumioxazin, glyphosate, 2, 4-D, and Imazamox, as these are for terrestrial spray. The table should be arranged to indicate what active ingredients can be used for aquatic application (acrolein, copper, dipotassium salt of endothall, mono salt of endothall, and sodium carbonate Peroxyhydrate), what can be used as topical spray, dry ditch or dewatered ditches, or slow moving water.

QCBID could not find Topramezone in DEIS.

**Page 20 Special Conditions S4.B.4. Marker and tracer dyes**

"The permittee may apply marker dyes indirectly to the waters of the State." Marker dyes are **directly** applied to the irrigation canals. QCBID assumes that Ecology is meaning that dyes are indirectly applied to the receiving waters of the State, meaning the POCs.

**Page 20 Special Conditions S4.D.1.a.i. General Application Restrictions**

"Permittees must make reasonable effort to reduce the use of acrolein in favor of more environmentally sensitive pesticides." This statement must be removed. The Integrated (AQUATIC) Vegetation Management Plan will be used to determine what chemicals will be used which includes all approved aquatic herbicides for control.

**Page 21 Special Conditions S4.D.1.a.ii. General Application Restrictions – Acrolein Applications**

S6.E.4 page 35, describes Endothall Application Plan, must be changed to S6.E.6 for Acrolein Application Plan, page 36.

**Page 21 Special Conditions S4.D.1.b.ii.a. General Application Restrictions – Endothall Applications**

The table of contents, S8.C page 4, says Treatment Notifications and Public Notices. Plans and Studies is actually under S8.D.

**Page 21 Special Conditions S4.D.1.c. General Application Restrictions – Fluridone Applications**

Fluridone has been used in a dry ditch spray, which falls under S1.C.2 "Pesticide treatments applied to dry canals, provided the canal remains dry for two weeks following the treatment." Clarification is needed if a fluridone application plan is needed if applied in a dry ditch.

The referenced paragraph should be changed to S6.E.5 for fluridone.

**Page 22 Special Conditions S4.D.2. Timing Windows**

This paragraph needs to distinguish that it is only mono salt of endothall (teton) that is subject to the timing window.

The sentence, "Timing windows do not apply to treatments conducted for emergent vegetation.", should be removed.

**Page 25 Special Conditions S5.3. and S5.3.b Monitoring Requirements – No discharge to a POC**

Under activities excluded from coverage, S1.C page 10, the language says pesticide treatments that do not flow into POC, which is assumed, treatments with no discharge at POC. However, this paragraph says it is still needed on the DMR. Ecology needs to clarify whether treatments with no discharge at POC do not require notifications to Ecology but treatments are required in the DMR's. Again, QCBID notifies Ecology of all treatments but will specify in the DMR's the affiliated POCs or say that there is "No Discharge" for those treatments that have no POCs.

What is a "treatment event"? Ecology should clarify this language with a change to "scheduled treatment(s)."

**Page 25 Special Conditions S5.4. Monitoring Requirements**

"The permittee must conduct full monitoring (S6.A)," according to the table of contents, S6.A refers to Operation and Maintenance.

**Page 25 Special Conditions S5.4.a. Monitoring Requirements**

Clarification is needed between the terminology when treated water is "reached" or "passed".

**Page 26 Special Conditions S5.4.c. Monitoring Requirements**

"Ecology approves reduced monitoring as per S6.B1." This should be S5.B1 to reflect reduced monitoring page 27.

**Page 27 Table 3. Monitoring Requirements**

The language meter or estimate needs more clarification. Flow in open canals and laterals are measured with various methods but not often with a meter. Some drains and wasteways in remote locations are hard to measure very accurately so are estimated by professional judgement.

**Page 27 S5.B.1.a. Special Situations – Reduced Monitoring**

Ecology should clarify if past approved reduced monitoring from the previous permit cycle is still in effect with the new permit.

**Page 28 S5.B.1.b.i. and S5.B1.b.ii. Special Situations – Reduced Monitoring requirements**

Samples taken "at each treatment site" implies sampling at a treatment site and not at the POCs. Samples are generally grabbed upstream or at POCs after treatments. Ecology needs to modify both of these sentences to specify that sampling is at the POC or downstream of a treatment site. Another interpretation is when treatments are below the effluent discharge limit, a sample can be collected downstream of the treatment

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site. For example, dipotassium salt –Cascade is applied at 4.0 ppm where the effluent limit is 5.0 ppm, then sample(s) can be collected downstream of the treatment site, therefore samples are not required at POCs.

**Page 28 S5.B.1.d. Special Situations – Treatment events that are contained and later released to flow to a POC – Monitoring data**

Clarification is needed for “monitoring data” and “calculations”. QCBID’s interpretation of “monitoring data” includes the following: photographs at POCs, flow records, and field monitoring testing data. QCBID thinks that “calculations” means calculating the holding times based on the SLN sheet. However, there is no further information on these two terms. Ecology should clarify this paragraph as to types of data and calculation methods.

**Page 29 S5.B.2.a.<sup>5</sup> Footnote**

After the word “Permittees” should insert have the word “apply” to distinguish the action needed.

**Page 29 S5.2.b.i.b. and S5.2.b.i.d. Special Situations – Treatment events when copper is applied**

Ecology should clarify if reduced monitoring from the past permit cycle is still granted for the new permit. This paragraph does not provide information if this is the case.

**Page 30 S5.C.2.b. Sampling Requirements – Parameters not required**

Eliminate the following parameters: Settleable solids, temperature, conductivity, pH, and turbidity. There is no need to list these parameters for this type of permit. If Ecology determines these parameters are needed then provide a written reason on why they are listed.

**Page 31 S5.C.3.a.b.c Sampling Requirements – flow measurement and continuous monitoring devices**

Some POCs have a stage discharge relationship that allows for measurement by reading of a staff gage. Staff gages are either cleaned off or replaced if damaged. Ecology needs to provide information for all types of flow measurements and what maintenance records are needed. “Keep this document as part as the permit cycle” should be removed. Flow records are kept related to the operation and maintenance of our facilities. QCBID is willing to provide these types of records after a formal public records request is submitted.

**Page 31 S6.A. Best Management Practices - Operation and Maintenance**

The last permit mentioned proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. This language is initially omitted in this draft permit but is then mentioned later in paragraph, G3., Proper Operation and Maintenance, on page 46. QCBID finds that managing laboratory controls and quality assurance is more applicable than maintaining “back-up or auxiliary facilities/systems”. Furthermore, clarification is needed by Ecology regarding “back-up or auxiliary facilities/systems.”

**Page 31 S6.B.1.a. Best Management Practices – Spill Prevention and Control**

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Ecology needs to provide clarification with regard to oil, fuel, chemicals and products. The last permit pertains to only all pesticides used, processed or stored at the facility that could spill into state waters. Control of chemicals should only apply to those approved for use in the permit.

**Page 31 S6.B.1.b. Best Management Practices – Spill Prevention and Control**

“Maintaining all mobile equipment to prevent leaks and spills of petroleum products,” suggests that service records on work vehicles should be provided. Ecology needs to clarify what is needed under this paragraph, as it should be limited to permit related chemicals.

**Page 31 S6.B.3.a. Best Management Practices – Spill Prevention and Control**

Omit “Material” for consistency. S6.B.1.c says “Safety Data Sheet.”

**Page 32 S6.C.1.b. Education and Outreach**

This paragraph is overreach by Ecology in an NPDES permit. Ecology should remove this section from the permit.

If this section is retained then Ecology needs to clarify what is meant by “reaches necessary destination.”

**Page 32 S6.C.1.c. Education and Outreach**

Omit “and emergent vegetation on the banks of conveyances.” Detail is referred to the first reference of emergent vegetation from page 10.

**Page 32 S6.C.4. Education and Outreach**

This is an excessive burden requested by Ecology and should be removed from the permit. Ecology has no grounds for requiring documentation of this type.

**Page 32 S6.D.1.a. Public Notice and Posting Procedures**

Omit “and emergent vegetation on the banks of conveyances.” See detail provided in comments to the first reference to emergent vegetation, S1.A on page 10.

**Page 32 S6.D.1.a.ii. Public Notice and Posting Procedures**

“Publish the public notice in a newspaper,” needs Ecology clarification on whether if this is the annual public notification needed before the start of irrigation.

**Page 33 S6.D.2. Public Notice and Posting Procedures – Posting Procedures**

“When applying any chemical treatment,” needs to change to either “when applying any chemical” or “when treating with chemical”.

Paragraph 2a says to post signs where **public** is likely to encounter treated water which also means **public** road crossings or drainage ditches. Ecology needs to understand that there are thousands of road crossings. Compliance with this posting requirement is overly burdensome on even a large irrigation district. Ecology needs to clarify the meaning of “likely to encounter” as irrigation canals and laterals are not for public access.



**Page 34 S6.D.2.e.i. Public Notice and Posting Procedures – Posting Procedures**

Posting mentions the name of the person and contact information. QCBID requests to change to name of the irrigation district.

**Page 34 S6.D.2.e.iii. Public Notice and Posting Procedures – Posting Procedures**

Omit “emergent vegetation.” Details are provided in the comments on the first reference of emergent vegetation from S1.A on page 10.

**Page 34 S6.D.2.e.iv. Public Notice and Posting Procedures – Posting Procedures**

QCBID questions if all pictograms are needed for posting. Warning signs as “NO TRESPASSING” should be sufficient to be continued for informing the public that they are not allowed access within our irrigation facilities and/or irrigation system. The approved pictograms seem excessive and could cause confusion from the public thinking that they are still allowed access. Furthermore, a “NO TRESSPASSING” pictogram or relative sign is not included in the approved pictograms and should be included as such.

**Page 34 S6.D.2.F. Public Notice and Posting Procedures – Posting Procedures**

“Remove signs by the end of the treatment season,” should be omitted. If signs are required, they will be posted indefinitely and replaced if damaged.

**Page 34 S6.E.1 a Plans and Studies -Integrated Vegetation Management Plan**

Insert “Aquatic” between Integrated and Vegetation.

Omit the language, “the engineering report must be developed in according with Chapter 173-240 WAC – Submissions of Plants and Reports for Construction of Wastewater Facilities”. This is not applicable to irrigation districts to submit an engineering report on the construction of wastewater facilities.

**Page 34 S6.2.iii. Spill Control Plan**

Ecology needs to clarify the meaning of a facility plot and what it entails. Irrigation District facilities overlay a large drainage area, so the meaning of this language needs to be clarified by Ecology.

**Page 34 S6.2.iv. Spill Control Plan**

“A list of all pesticides used, processed, or stored at the facility that could spill into Waters of the State.” This does not include oil and fuel spill as stated earlier in S6.B.1a on page 31. QCBID believes that the Spill Control Plan should only consist of the chemicals pertinent to the permit.

**Page 35 S6.E.3. Travel Time Study**

Travel times vary with flow rates, weed conditions, weather and water deliveries. QCBID suggests that time travel studies should be conducted at the beginning of the irrigation season, mid-season at peak flow and tail-end of the season to get a better depiction due to all the variables. QCBID insists that past data can be used from the last permit cycle.

**Page 35 S6.E.3.d. Travel Time Study**

"If there is a change in the travel time that differs more than 5% of the previously reported travel time." This would require more travel time studies. QCBID suggests the following time travel studies as stated above due to all the variables, insisting that past data can be used from the last permit cycle.

**Page 36 S6.E. 4.v. Travel Time Study – Endothall Application Plan**

"An explanation of how using endothall has impacted your use of copper," needs to be omitted. When endothall was introduced to aquatic treatments, it was expected that the use of copper would be reduced. Endothall is a useful tool, but QCBID still needs all chemicals for aquatic vegetation control based on treatment experience.

**Page 36 S6.E.5. Fluridone Application Plan**

This chemical has been used in dry ditch spray which would fall under S1.C1 on page 10. Ecology needs to clarify if a plan is needed for a dry ditch spray.

**Page 36 S6.E.6.i. and S6.E.6.ii. Acrolein Application Plan**

"A justification of use and a narrative threshold for using acrolein," needs to be defined and is not provided in the glossary section of the permit. QCBID wants to point out that this is not needed for the other approved chemicals in the permit. QCBID believes that the IAVMP would suffice for the use of acrolein.

**Page 37 S7.C.2. General Record Keeping – Public Access to Records**

"The permittee will have seven (7) days from the date of Ecology's notification of the request, to submit the requested documents to Ecology". Ecology needs to clarify if seven (7) days is equivalent to seven (7) working days. QCBID requests this language be changed to fourteen (14) working days to make the requested submittal of documents.

**Page 37 S7.D. Documenting Monitoring Data**

Ecology needs to define what documenting monitoring data consist of. QCBID is not sure if this includes data photographs, flow records, and field monitoring data.

**Page 37 S8.A.b. Reporting – Discharge Monitoring Reports**

"On or before the first day of the second month after the month." At times, results are not received back from the lab on time. There have been several instances when QCBID had to let Ecology know that results were not received back in time to finish the DMR. QCBID requests that DMR's are due on the 15<sup>th</sup> of the second month after the month.

**Page 39 S8.B.2.c Reporting – Recording Results – Acrolein Applications**

"Include in your records the calculations required for S4.D.1." QCBID will need more clarification on calculations. QCBID assumes that Ecology means that the calculations are for the holding times based on the SLN.

**Page 39 S8.B.2.e Reporting – Recording Results – Fluridone and imazapyr Applications**

QCBID is questioning if a plan for either fluridone or imazapyr dry ditch application is needed if treatment falls under the exclusion in section S1.C1 on page 10.

**Page 39 S8.B.3. Reporting – Recording Results**

“If the permittee samples treated water more frequently than required or analyzes a parameter not required, they must include results in the records.” QCBID sometimes sends samples downstream from a treatment to verify concentration rates, and this is noted on the DMR as a rate verification.

**Page 40 S8.C.2. Annual Treatment Reports**

“The report must include a listing of all pesticide applications, including the amount of pesticide used.” QCBID is inquiring if that includes dry ditch applications.

**Page 40 S8.C.3. Annual Treatment Reports**

“The Permittee must submit the annual report to ecology no later than February 1 of each year.” Ecology should specify no later than February 1 of **the following year**.

**Page 40 S8.D.1.a. Treatment Notifications and Public Notices -Treatment Notifications -Planned Notifications**

Ecology needs to define what a “treatment event is.” QCBID would like the word “event” taken out and request to change to planned scheduled treatment(s).

**Page 41 S8.D.1.b. Treatment Notifications and Public Notices – Unplanned Treatment Events**

Change to treatment(s) and omit “events”.

In the table of contents, S8.D is Plans and Studies and S8.C Treatment Notifications and Public Notices. Ecology needs to update the correct reference.

**Page 41 S8.D.2. Treatment Notifications and Public Notices – Public notices**

“By February 1<sup>st</sup> of each year”, is not enough time to publicly notify and submit to Ecology a copy of the published legal notices. The public notice in the winter months is not feasible when the irrigation season hasn't started yet. Ecology should specify the February 1<sup>st</sup> **of the following year**.

**Page 41 S8.E.2. Plans and Studies -Integrated Vegetation Management Plan**

Insert “Aquatic” between Integrated and Vegetation.

**Page 41 S8.E.2.a.i. Plans and Studies -Integrated Vegetation Management Plan**

Insert “Aquatic” between Integrated and Vegetation. Omit “emergent vegetation on the banks” for the reasons stated in these comments regarding S1.A on page 10.

**Page 41 S8.E.2.a.ii. Plans and Studies - Integrated Vegetation Management Plan**

Insert "Aquatic" between Integrated and Vegetation and an "A" in IVM Plan.

**Page 41 S8.E.2.b. Plans and Studies -Integrated Vegetation Management Plan**

Insert "Aquatic" between Integrated and Vegetation.

**Page 41 S8.E.3.b. Plans and Studies -Spill Control Plan**

S8.D is Plans and Studies in the table of contents. S6.B is listed as Spill Prevention and Control. Ecology needs to make corrections.

**Page 42 S8.E.4.b. Plans and Studies – Travel Time Studies – New Entities**

Special Condition S8.B refers to Annual Treatment Reports on the table of contents. QCBID asks Ecology to change the reference to S6.E Plans and Studies.

**Page 42 S8.E.5.a.ii. Plans and Studies – Endothall Application Plan**

QCBID cannot find S5.E.4 in the table of contents or document. QCBID questions if paragraph S4.D.b page 21 or paragraph S6.E.4 page 35 is what Ecology is referring to.

**Page 42 S8.E.5.b. Plans and Studies – Endothall Application Plan -New Entities**

S8.B is Annual Treatment Reports and needs to be referred to the correct reference in the table of contents.

**Page 42 S8.E.6.a.ii. Plans and Studies - Fluridone Application Plan - Existing Permittees**

There is no S5.E.5. QCBID questions if Ecology is referring to paragraph S4.D.c page 21 or paragraph S6.E.5 page 36.

**Page 42 S8.E.6.b. Plans and Studies - Fluridone Application Plan – New entities**

S8.B Annual Treatment Reports and needs to be referred to the correct reference in the table of contents.

**Page 43 S8.E.7.a.ii. Plans and Studies – Acrolein Application Plan**

QCBID cannot find the referenced paragraph S5.E.6.

**Page 43 S8.F.1. Reporting Noncompliance and Spills – Reporting noncompliance**

This is listed as S8.E. in table of contents. The statement "Waste treatment equipment," needs clarification by Ecology on what this is.

**Page 44 S8.F.1.v. Reporting Noncompliance and Spills – Reporting noncompliance**

Insert "Aquatic" between Integrated and Vegetation.

**Page 44 S8.F.3.a. Reporting Noncompliance and Spills – Reporting noncompliance – Reporting adverse incidents**

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QCBID will need more clarification on “any person(s) exhibiting or indicating any toxic and/or allergic response because of treatment.” QCBID is not sure if this pertains to work exposure or people that are trespassing within irrigation facilities.

**Page 44 S8.F.3.b. Reporting Noncompliance and Spills – Reporting noncompliance – Reporting adverse incidents**

QCBID has no control of fish in the CBP irrigation system.

**Page 46 G3. Proper Operation and Maintenance**

QCBID will need more clarification. “This provision requires the operation of back-up or auxiliary systems which are installed by a permittee, only when their operation is necessary to achieve compliance with the conditions of this permit” should be omitted. QCBID assumes that O&M and engineering information is needed for this.

**Page 48 G6. Removed Substances**

If Ecology were to permit discharge of wastewater into our irrigation system, then QCBID would have no control of these permits.

**Page 48 G8. Additional Monitoring**

Regarding “Ecology may establish additional specific monitoring requirements, including the installation of groundwater monitoring wells,” the entire paragraph needs to be removed. The permit is treating surface water within the irrigation system, not groundwater.

**Page 52 G22. Bypass Prohibited**

QCBID would like more information on what a “Bypass” is. It is not defined in the glossary. QCBID questions if a retention or holding pond falls under this terminology.

**Page 52 G22.B.1. Bypass Prohibited – Bypass which is unavoidable, Unanticipated, and Results in Noncompliance of this Permit**

Ecology needs to provide clarification on the meaning of “treatment facilities.” This permit is for use of aquatic chemicals in irrigation facilities.

**Page 52 G22.B.2. Bypass Prohibited – Bypass which is unavoidable, Unanticipated, and Results in Noncompliance of this Permit**

QCBID would like more information on what a “Bypass” is. It is not defined in the glossary. QCBID questions if a retention or holding pond falls under this terminology.

**Pages 55 - 60 Appendix B: Glossary**

Some terminology will need its own entry as they are accidentally included in previous terminology.

**Page 61 Appendix C: Required Analytical Methods -Table 4: Required Analytical Methods**

Flow- calibrated devices - Open channel flow is measured by establishing a stage-discharge relationship and then estimated by reading a staff gage. Ecology will need to include all methods of flow measurements.

Total water hardness (only when monitoring copper) – QCBID questions if past data from the previous permit cycle can be used.

**Page 62 Appendix D Listed Adjuvants – Table 5: Adjuvants**

Ecology should omit all adjuvants as that is part of terrestrial spraying.