

Snohomish County DCNR SWM (Jennifer Oden)

Comments on Draft Aquatic Plant and Algae Management General Permit

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Fact Sheet Comments

Pg 8 – missing explanation of 2025 EPA vs. SF ruling. Just one sentence in current draft, "Add explanation of 2025 EPA vs. SF ruling."

Pg 35-36 – example treatment area graphics are just a blue box – not sure if this a pdf download issue but could be an issue for others.

Draft Aquatic Plant and Algae Management General Permit Comments

Section S2.A.2 Who May Obtain Permit Coverage

Why are phosphorus products "discharged", and herbicides "applied"? Both are chemicals that can be liquid or solid.

Who is the "discharger"? Is this the same as applicator or sponsor?

Section S3.B Temporary Exceedance of Water Quality Standards

This section only references pesticide applications as allowable to temporarily exceed standards. Does this infer that other products covered under this permit are not allowed the same temporary exceedance?

Table 3

Alum (Aluminum sulfate and Sodium Aluminate) and Calcium Products – What is a range finding test? What are we testing for pH? Is this different than a jar test? Currently, jar tests are specifically used to determine impacts to the lake pH based on lake conditions at the time of the treatment with the chemicals that are delivered. If the treatment is using a buffer, then the ratio of alum to buffer is also verified based on the lake conditions at the time of treatment. This test is not used to calculate a dose for treatment. This is done well in advance of the treatment.

There are different pH ranges for Phosphorus Control Products in Table 3? Alum 6-8.5 and calcium is 6-9. There are no pH range requirements for lanthanum products, but pH monitoring is required in the monitoring section (S6) for these products. Make pH ranges and requirements consistent across document.

Section S5.F Fish Hatcheries

The table numbers referenced in this section are incorrect.

Section S6.A.1 High Risk Periods (for Application of Herbicides and Algaecides)

The draft language defines a high-risk period as water temperature at or above 15C (or 59F) and dissolved oxygen thresholds of 7mg/L and 9 mg/L. 9 mg/L will be difficult to obtain in high water temperatures. Where did these thresholds come from? This would classify the entire growing season for aquatic plants as high risk (May – September/October). If the risk is treatment during really high temperature events – then increase the temperature threshold to something more

reasonable. Also, section S3B allows for temporary "exceedances", and this section does not.

Section S6.B Application of Phosphorus Control Products

S6.B.1.d Clarify wording in to match Table 5 - three sampling events within three months of treatment are required to determine pre-treatment conditions

Table 5 – these monitoring requirements are specific to Alum. Add additional tables for monitoring requirements for other Phosphorous Control Products based on their active ingredients.

S6.B.2.a Range Finding Testing – A day-of treatment pre-treatment test is inappropriate to use to calculate the dose of the treatment. Dosing for a treatment is calculated well in advance.

S6.B.2.c Parameters collected as samples for later analysis

The draft language states this will be done to determine the pre- and post- treatment concentrations and assess aluminum toxicity thresholds. Need to define "aluminum toxicity thresholds" in permit. How does sulfate help determine aluminum toxicity thresholds? How is dissolved aluminum used in the current aluminum toxicity calculator to determine thresholds? What are the criteria for sulfate?

S6.B.2.d pH monitoring during treatment

The draft language states to analyze for alkalinity and take "immediate" steps to increase pH. Alkalinity is a lab analyses and will take at the least a few days for results. This parameter is not appropriate if intended to be used to make immediate decisions.

S6.B.5.a Reporting Phosphorus Control Monitoring Data

Lab data may not be reported and assessed for quality control within 30 days of sampling. This time frame should be longer.

Please clarify "data used to estimate alum (or other P control chemical) doses." Do you want the Algae Control Plan or similar report with the dosing calculations? Raw lab data? Sediment core data? Also "P control" should be spelled out to be consistent with the rest of the document.

This section also references jar tests, but previous sections reference "range finding" tests. Please clarify.