

NPDES Pesticide General Permit (PGP)  
Fourth Stakeholders Meeting – September 30, 2010  
Summary of Discussion

Dan Dell - Introductions and PGP Development Status Report

- Stakeholder attendance at the 9/30/10 meeting was slightly better than the 8/16/10 meeting; attendees are listed on the attached sign up sheet.
- DNRE continues to make significant progress developing the four General Permits.
- Indicated that public notice period for general permits will be 30 days
- Also expressed that plan to hold a public hearing shortly after the close of the public notice period.

Jeff Fischer – Overview of General Permits status

- Jeff Fischer identified key changes made to Mosquito Control GP and solicited comments.
- Stated quality and content of 9/30 GP drafts are consistent.
  
- Acknowledged that the language regarding Monomolecular Surface Films (MSF) needs to be modified to allow standing water in floodplain to be treated.
- Mosquito control industry rep. requests that Temephos use be allowed, state are o.k. with having to obtain an individual permit for its use.
- Consumers Energy rep. expressed concern about including the “unauthorized activities” section in the permit, to ambiguous.
- Question: does DNRE have staff resources currently available to review submitted documents? Response: Templates will be developed if possible to assist permittees in developing other documents
- Question: when will application forms for Individual permit be ready? Response: expect to use current application with modifications.
- Question: can pest management area be a county? Response: Yes.
- Comment: annual report language needs to be adjusted to recognize summary of activities will suffice for compliance (DNRE agrees to modify).
- Comment: treatment area definition needs to be tweaked, suggest “immediate pesticidal benefit in specific water body”. (DNRE agrees).
- Fischer: “Public Participation in a Proposed COC” language will be removed before public notice.
- Will clarify in FAQ document how aduclticing will ultimately be addressed

Jeff Fischer summarized changes in Aquatic Nuisance Plant and Algae Control GP draft.

- Comment: need to explain how ditch bank terrestrial plants will be handled.
- DNRE agreed to delete “Concentration” from definitions.

- Matt Preisser: need to adjust definition of “Declared Pest Emergency” to remove 10 day timeframe, not appropriate
- Stakeholders identified three inconsistencies between color coded and black and white versions of draft permits.

Jeff Fischer summarized changes to the Forest Canopy Pest Control GP draft.

- Stakeholder requests Section B.1.d be modified to “habitat management” (DNRE agreed to consider change).
- Brian Rowe’s letter to Hobria clarified which pesticide applications are truly aquatic.
- Comment: Surveillance for forest canopy pests is done with pest eggs

Jeff Fischer summarized changes to the Aquatic Nuisance Animal GP draft.

- Viral Hemorrhagic Septicemia (VHS) issue brought up by Brian Rowe...application of pesticide is done outside of water, therefore, would not need coverage under general permit.
- Stakeholders raised concern about removal of “unnatural” from narrative standard in GP’s

DNRE indicated revised draft GP’s will be distributed to stakeholders for final comment prior to public notice.

Meeting adjourned.