

**Submitting Comments
to
EPA-HQ-OW-2010-0257
Proposed NPDES PGP
on July 19, 2010**

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Your Comments due to EPA by July 19, 2010

➤ We need everyone (including family) in the industry to Submit comments via

- Email: ow-docket@epa.gov

- or snail mail:

Water Docket

US EPA, Mail Code: 2822T

1200 Pennsylvania Avenue, N.W.

Washington, DC 20460

Attn: Docket ID Number

EPA-HQ-OW-2010-0257



Your Company Description

- Make it personal!
 - State you are a small business and the impact this rule will have on your business
 - Years in Business
 - Number of Employees
 - Number of Dependents for Employees



Your Qualifications

- Years certified to apply aquatic pesticides -
 - Number of violations
- Adverse Incidents -
 - Have you ever seen one?



Describe Your Services

➤ We treat aquatic weeds / algae

- In Lakes
- In rivers
- In ponds
- In reservoirs

We treat a total of _____ acres a year

- Count each treatment, that is if you treat a pond or lake multiple times, count each treatment separately to arrive at the total accrued treated acres



Describe Your Equipment

- Boat (size and numbers)
- My Spray Rig (You built it yourself)
 - Tank
 - Pump
 - Control Valve
 - Computer
 - GPS

Describe Your Main Customer Base

➤ Large Government Units

- Federal
- State
- Regional (Water Board, Irrigation District)

➤ Small Entities

- Lake Association
- Homeowner Association
- Private Citizens



Permit Water Use Goals

- Tell EPA Your Customer determines ...
 - When treatment is needed
 - when to use pesticides and has already considered other methods
 - when Action Threshold has been met

Permit Record Keeping

- Tell EPA the requirements are Excessive and is an extreme financial burden to small business
 - possibly 8 years of record keeping?
- Tell EPA “No” to annual reporting that includes your client list, which contains confidential business information

Copy Your E-mail or Letter to Federal and State Reps and Officials

➤ Thanks for Opportunity to Comment

- CC - Senators
- CC - Congressman
- CC - Governor
- CC – Pesticide Regulators

