



**Willapa-Grays Harbor Oyster Growers Association**  
P.O. Box 3 Ocean Park, WA 98640

March 17, 2016

**VIA EMAIL AND U.S. MAIL**

Rich Doenges  
Southwest Region Manager  
Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

**RE: National Pollutant Discharge Elimination System Permit Application**

Dear Rich:

This letter responds to your request for information dated February 10, 2016. Below is a summary of WGHOGA's responses to your requests:

**NPDES Application:**

- EPA Form 3510-2SD, Section V, Table 2d-2 has been corrected (see Attachment 1).
- Nature of Business, Form 1, Page 2: The applicant is requesting the ability to treat up to 500 acres annually, 485 in Willapa Bay, and 15 in Grays Harbor. Locations where imidacloprid may be applied are detailed in the maps provided as Attachment 2 to this letter, and the details of annual applications are set forth in the Sediment Impact Zone applications also accompanying this letter.

**Supplemental Information for the SEPA Checklist:**

- Acresage: As noted above, the applicant is requesting the ability to treat up to 500 acres annually, 485 in Willapa Bay, and 15 in Grays Harbor. Locations where imidacloprid may be applied are detailed in the maps provided as Attachment 2 to this letter.
- Aerial application: WGHOGA does not plan to apply imidacloprid in an aerial manner under the terms of the permit it has applied for.

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- Effectiveness of granular and pellet form of imidacloprid: Due to delays in receiving the granular product and the set-up of the barge based applicator only 12 acres were treated in 2014. The efficacy data for these beds (B-67, B-44) were included in Table 14 of the 2014 Field Investigations Report. The efficacy results showed a decrease in burrow counts from 63% on bed B-67 to 82% on B-44. Additional efficacy data is summarized in the Sediment Impact Zone Applications accompanying this letter.
- Location of shellfish beds to be treated during the term of the permit: Treatments in Grays Harbor will be focused on approximately 15 acres of shellfish beds east of Westport in the South Bay. In Willapa Bay growers plan to treat up to 30 acres per year in the South Bay, up to 485 acres in the Central Bay, and up to 125 acres per year in Northern Willapa Bay. Total acres treated per year would not exceed 15 acres in Grays Harbor and 485 acres per year in Willapa Bay. See Attachment 2.

**Sediment Impact Zone Application:**

Enclosed as Attachments 3 and 4 are Sediment Impact Zone Applications for Willapa Bay and Grays Harbor.

Very truly yours,



Ken Wiegardt  
President

# **ATTACHMENT 1**

**V. Effluent Characteristics**

A and B: These items require you to report estimated amounts (*both concentration and mass*) of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instruction for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

**General Instructions (See Table 2D-2 for Pollutants)**

Each part of this item requests you to provide an estimated daily maximum and average for certain pollutants and the source of information. Data for all pollutants in Group A, for all outfalls, must be submitted unless waived by the permitting authority. For all outfalls, data for pollutants in Group B should be reported only for pollutants which you believe will be present or are limited directly by an effluent limitations guideline or NSPS or indirectly through limitations on an indicator pollutant.

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source ( <i>see instructions</i> )
N/A			

C. Use the space below to list any of the pollutants listed in Table 2D-3 of the instructions which you know or have reason to believe will be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it will be present.

1. Pollutant

2. Reason for Discharge

N/A

#### VI. Engineering Report on Wastewater Treatment

A. If there is any technical evaluation concerning your wastewater treatment, including engineering reports or pilot plant studies, check the appropriate box below.

Report Available

No Report

B. Provide the name and location of any existing plant(s) which, to the best of your knowledge, resembles this production facility with respect to production processes, wastewater constituents, or wastewater treatments.

Name


Location

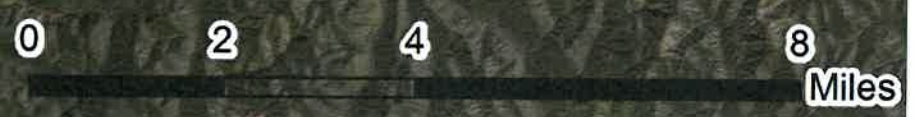
N/A

# **ATTACHMENT 2**



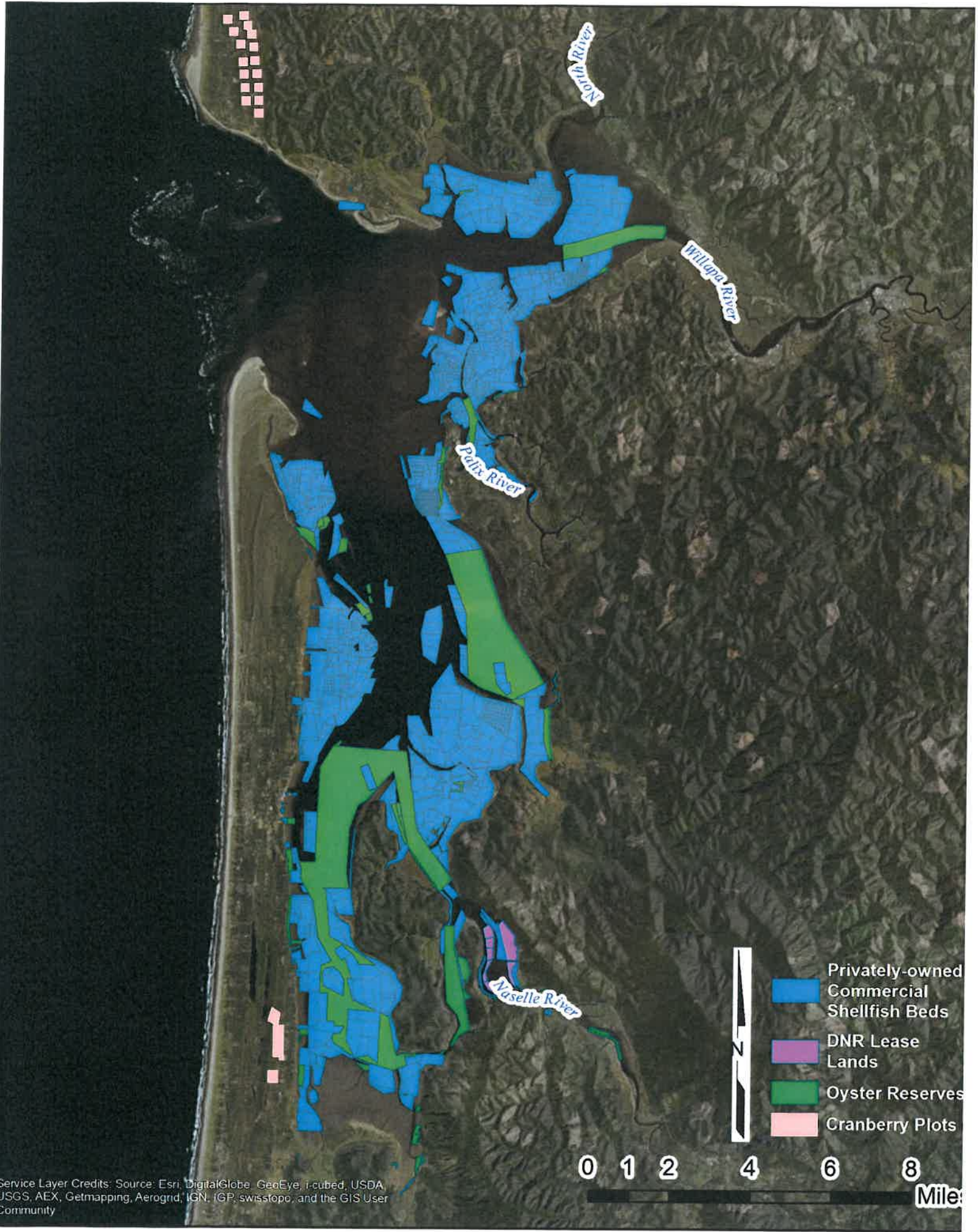


-  Cranberry Plots
-  Commercial Shellfish Beds



Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, i-cubed, U.S.G.S. AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS Community





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