

ATTACHMENT E – NOTICE OF INTENT

**WATER QUALITY ORDER 2016-0039-DWQ
GENERAL PERMIT CAG990004**

RECEIVED

APR 28 2016

DIVISION OF WATER QUALITY

**STATEWIDE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT
FOR BIOLOGICAL AND RESIDUAL PESTICIDE DISCHARGES
TO WATERS OF THE UNITED STATES
FROM VECTOR CONTROL APPLICATIONS**

I. NOTICE OF INTENT STATUS (see Instructions)

Mark only one item	<input type="checkbox"/> A. New Applicator	<input type="checkbox"/> B. Change of Information: WDID# _____
	<input type="checkbox"/> C. Change of ownership or responsibility: WDID# _____	
	<input checked="" type="checkbox"/> D. Enrolled under Order 2011-0002-DWQ: WDID#	4B197800001

II. DISCHARGER INFORMATION

A. Name Westlake Lake Management Association			
B. Mailing Address 32353 West Triunfo Canyon Road			
C. City Westlake Lake	D. County Los Angeles	E. State CA	F. Zip Code 91361
G. Contact Person Carl Koenig	H. Email address westlakelakemgmt.@gmail.com	I. Title Lake Manager	J. Phone (818) 889-5377

III. BILLING ADDRESS (Enter Information only if different from Section II above)

A. Name			
B. Mailing Address			
C. City	D. County	E. State	F. Zip Code
G. Email address	H. Title	I. Phone	

IV. RECEIVING WATER INFORMATION

A. Biological and residual pesticides discharge to (check all that apply)*:

1. Canals, ditches, or other constructed conveyance facilities owned and controlled by Discharger.
Name of the conveyance system: _____

2. Canals, ditches, or other constructed conveyance facilities owned and controlled by an entity other than the Discharger.
Owner's name: _____
Name of the conveyance system: _____

3. Directly to river, lake, creek, stream, bay, ocean, etc.
Name of water body: Westlake Lake

* A map showing the affected areas for items 1 to 3 above may be included.

B. Regional Water Quality Control Board(s) where application areas are located
(REGION 1, 2, 3, 4, 5, 6, 7, 8, or 9): Region Los Angeles Region 4
(List all regions where pesticide application is proposed.)

A map showing the locations of A1-A3 in each Regional Water Board shall be included.

V. PESTICIDE APPLICATION INFORMATION

A. Target Organisms: Vector Larvae Adult Vector

B. Pesticides Used: List name, active ingredients and, if known, degradation by-products
Bacillus thuringiensis israelensis (Bti), no degradation by-products

C. Period of Application: Start Date July 1, 2016 End Date Continuous

D. Types of Adjuvants Added by the Discharger: None

VI. PESTICIDES APPLICATION PLAN

A. Has a Pesticides Application Plan been prepared?*

Yes No **There will be no changes in application methods or pesticides which will be applied from those stated in the

If not, when will it be prepared? _____ previously submitted PAP.

* A copy of the Pesticides Application Plan shall be included with the NOI.

B. Is the applicator familiar with its contents?

Yes No

VII. NOTIFICATION

Have potentially affected governmental agencies been notified?
 Yes No

* If yes, a copy of the notifications shall be attached to the NOI.

VIII. FEE

Have you included payment of the filing fee (for first-time enrollees only) with this submittal?
 Yes NO NA

IX. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment. Additionally, I certify that the provisions of the Order, including developing and implementing a monitoring program, will be complied with."

A. Printed Name: Carl Koenig
 B. Signature: *Carl Koenig*
 C. Title: Lake Operations Manager

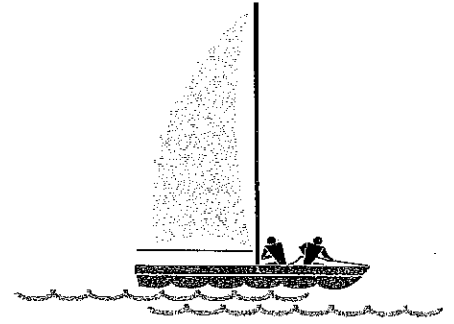
Date: 4/24/2016

X. FOR STATE WATER BOARD USE ONLY

WDID:	Date NOI Received:	Date NOI Processed:
Case Handler's Initial:	Fee Amount Received: \$	Check #:

WESTLAKE LAKE MANAGEMENT ASSOCIATION

32353 Triunfo Canyon Road
Westlake Village, California 91361
(818) 889-5377/(818) 889-5039 Fax
westlakelake@earthlink.net
www.westlake-lake.com



CLEAN LAKES INC.

Aquatic Ecosystem Restoration & Maintenance

Notice of Intent to Apply Aquatic Pesticide — *Bacillus thuringiensis israeliensis* (Larvicide Vectobac 12AS, AquaBacXT, or other equivalent liquid or granular formulations) to Westlake Lake.

Westlake Lake Management Association has contracted with Clean Lakes, Inc. to apply a larvicide with the active ingredient *Bacillus thuringiensis israeliensis* to Westlake Lake for midge control. The active ingredient in Vectobac or AquaBacXT is a common bacteria strain known as *Bacillus thuringiensis israeliensis* or BTI. BTI is labeled for the control of aquatic midge larvae. Product names are Vectobac 12AS, AquaBacXT, or other names. BTI is highly target specific and has been found to have significant effects only on mosquito and aquatic midge larvae and closely related insects such as black flies. BTI has no measureable toxicity to vertebrates and is classified by the US EPA as "Practically Non-Toxic" with a Caution pesticide label.

These applications will be performed lake wide on Westlake Lake between the months of April and October in order to keep midge populations under nuisance levels. Applications are to the lower part of the water column of Westlake Lake, and are designed to maintain an effective level of control. Post application, BTI biodegrades in 48-72 hours and leaves no detectable residue in the water. There are no post-application water use restrictions in regard to current allowable uses of Westlake, i.e. fishing and boating.

BTI contains naturally produced bacterial proteins generally regarded as environmentally safe. It leaves no residues and is quickly biodegraded. At the application rates used for midge control, BTI is unlikely to have any measureable effect on water quality. There are no established standards, tolerances or EPA approved tests related to BTI. Other naturally occurring strains of this bacterium are commonly found in aquatic habitats.

Any comments or concerns, please contact Westlake Lake Management Association at 818-889-5377, or Clean Lakes, Inc. at 818-889-8691.

*31320 Via Colinas, Unit 114
Westlake Village, California 91362
Telephone: 1-818-889-8691
Fax: 1-818-889-8693*



Westlake Lake Pesticide Application Plan
for NRDES General Permit coverage under Vector Control
Water Quality Order 2014-0002-DWC

Prepared by:

AquaTechnex, LLC

PO Box 4193 Palm Desert, CA 92261

www.aquatechnex.com

Pesticide Application Plan and Statement of Best Management Practices for the Westlake Vector Control Program

For Water Quality Order No. 2011-0002-DWQ Statewide General National Pollution Discharge Elimination System (NPDES) for discharges of aquatic pesticides to Waters of the United States from Vector Control Applications

Background

Westlake is a 123 acre impounded lake system located within the City of limits of Westlake Village and Thousand Oaks California. The lake was created as the centerpiece of a planned community village. There are a number of homeowner associations that have been established by the various builders that have developed residential communities around the lake. The Westlake Lake Management Association was established to represent these homeowners associations and provide for the common management and protection of lake users and water quality within the lake system.

From time to time, Westlake experiences severe hatches of Aquatic Midges. Aquatic midges are mosquito like insects in the family Chironomidea. "Blind Mosquito" is a layman's term, which many use to refer to several species of these midges. Midges do not bite, suck blood or carry disease. Their occurrence and survival in certain eutrophic waters cause issues when they emerge in such large numbers to pose a nuisance by swarming outdoor areas.

The life history of the midge is presented in Appendix 1.

Westlake can experience severe hatches of aquatic midges, generally in the spring and early summer. Absent management, these hatches have a severe impact on the community. The adult swarms force residents to seal their homes to exclude the insects. They can not use their decks and patios during these times. The aquatic midge swarms generate an excessive amount of feces that builds up on decks, docks and boats damaging these surfaces and causing significant economic damage.

WLMA has studied this issue for a number of years and has developed a program of Best Management Practices (BMPS) based on the philosophy of Integrated Pest Management (IPM). Pesticide use is only one element of the IPM Strategy. Our IPM emphasizes the use of non chemical technologies whenever possible and is based on a program of continual monitoring of both adult and larvae midge populations and impacts on beneficial uses at Westlake.

This Plan supports WLMA's midge management program and the Notice of Intent filed with the Los Angeles Regional Water Quality Control Board to participate under the General National

Pollution Discharge Elimination System (NPDES) permit to apply aquatic pesticides for vector control in waters of the United States.

When aquatic pesticides are considered for use, only *Bacillus thuringiensis israelensis* biological larvacide are proposed for use in Westlake.

Research has shown that this larvacide has little or no lasting environmental impacts when directly applied to water bodies with the purpose and intent of killing aquatic midge larvae. This larvacide is extensively discussed in the General Permit. This material is a biological material and degrades rapidly in the environment, thus the aerial extent and duration of residues are considered negligible and do not remain beyond the intended purpose of the applied larvacide. When integrated with other strategies including biological and physical methods constituted safe and effective Best Management Practices (BPM's).

This document describes the Westlake Pesticide Application Plan and proposes a Monitoring Reporting Plan that is commensurate with the negligible effects of the larvacide proposed for use. Additionally, this larvacide applied at rates specified on the label and discussed in the General Permit, will not impact the physical parameters of the environment, (ie temperature, salinity, turbidity and pH).

Statement of Best Management Practices

Introduction

The basic components of an IPM program are:

1. Surveillance of aquatic midge populations both in the lake sediments and in the atmosphere
2. Determination of treatment thresholds
3. Selection from a variety of control options including physical, cultural, biological and chemical control technologies
4. Training and certification of applicators
5. Public education

Midge surveillance

Surveillance of midge populations is essential for assessing the necessity, location, timing and choice of appropriate control measures. Surveillance reduces the areal extent and duration of pesticide use, by restricting treatments to areas where midge populations exceed established thresholds. Information on the species, density, and stages present is used to select an appropriate control strategy from integrated pest management alternatives.

WLMA has retained an professional aquatic pesticide application business and lake management consultant to perform these applications. The Lake Management firm inspects the lake weekly throughout the six months where aquatic midge problems can occur. Their staff will monitor for midge larval presence and abundance. The WLMA lake patrol is staffed 24 hours per day and will perform visual inspection of adult midge densities during period of concern and the WLMA lake management office communicates with lake residents and records complaints when densities are problematic of adult aquatic midges. This information will be noted and used to determine when thresholds are exceeded.

Pre Treatment Thresholds/Decision Making

Beneficial uses for Westlake and the adjacent community include boating, fishing, moorage for electric powered vessels, residential including outside dining and commercial including outside restaurants. Excessive levels of adult midge impact all of these beneficial uses of the lake and surrounding environment. Treatment thresholds will be established that protect these beneficial uses from the impact of these organisms.

The primary method of control is biological through the management of the fishery within Westlake. The lake is stocked with sunfish and other insect predator species and fish stocking rates are adjusted to account for mortality. This has in the past four years mitigated the need for application of larvacides.

The threshold for treatment is established where adult aquatic midge density determined by insect counts and complaints exceed levels where nuisance and/or property damage conditions are present.

When these thresholds are exceeded, appropriate control strategies are selected and implemented to minimize potential environmental impacts while maximizing efficacy. The method of control selected is based on the above threshold criteria, plus water conditions and quality, weather conditions, cost, and water flow.

Types of target areas inspected and treated as needed

All of the main body of Westlake and the finger areas of the lake will be inspected on a regular schedule as noted above.

Treatment Strategies and Alternative Controls

Source reduction

In many vector control situations, source control is a viable strategy. Midges will lay eggs in any standing water area from lakes to swimming pools to ponded irrigation water in lawns. Source reduction is not a viable alternative for Westlake. This waterbody is a constructed 123 acre lake system impounded by a dam at the eastern end of the lake. It is not possible to reduce the source to control aquatic midge.

Physical Control

Physical control for insect vectors is an action that is also not possible for Westlake. The major proven physical control technologies involve reducing or eliminating vector developmental sites to reduce the need for chemical applications. In the case of Westlake, it is not a viable option.

Biological Control

Biological control is a viable option for Westlake and is the primary tool used in the management of aquatic midge. There are a number of species of fish that act as predators for both the larvae living in the lake sediments, the pupae in the water column transitioning to the lake surface to hatch and the adult hatch on the lake surface. Westlake has been stocked with catfish species at densities that have a significant impact on aquatic midge larvae in the lake sediments. A number of species of sunfish that prey on pupae and adults on the lake surface are also stocked at densities that have a significant impact on aquatic midge populations.

The biological control strategy involves monitoring the density of these predator fish species and augmenting them with stocking from local fish hatcheries when their numbers are reduced through fishing, consumption by bass and high predators and natural mortality. This strategy has kept problems species low during most periods of the year and have mitigated the need for regular treatments with pesticides.

This management strategy has no impact on lake water quality. Fish are a natural component of the aquatic ecosystem and their levels are supported by the food supply.

Microbial Insecticides

Microbial insecticides contain naturally produced bacterial proteins that are toxic to midge larvae when ingested in sufficient quantity. Although they are biological agents, any material applied to control a pest is considered a pesticide by the US EPA and applicable regulations they develop and enforce. These bio-pesticides are only considered pesticides because of the claims of control they provide and the regulations in the Federal Insecticide Fungicide Rotenticide Act that any such material must be labeled through the process the EPA has established.

While there are a number of bio-pesticides labeled for the control of mosquitoes, *Bacillus thuringiensis* var. *israelensis* or BTI is labeled for the control of aquatic midge larvae. Product names are Vectobac 12AS, Vectobac G and Vectobac WDG.

BTI is highly target specific and has been found to have significant effects only on mosquito and aquatic midge larvae and closely related insects such as black flies. It is available in a variety of liquid, granular and pellet formulations, which provides some flexibility in application methods, equipment and contact time. BTI has no measureable toxicity of vertebrates and is classified by the US EPA as "Practically Non-Toxic". It comes with a Caution label. BIT formulations contain a combination of five different proteins within a larger crystal. These proteins have varying modes of action and synergistically act to reduce the likelihood of resistance developing in larval target populations.

Bacterial insecticides must be fed upon by larvae in sufficient quantity to be effective. Therefore applications must be carefully timed to coincide with periods in the life cycle when larvae are actively feeding. Pupae and late 4th stage larvae do not feed and therefore would not be controlled by BTI. Low water temperature inhibits larval feeding behavior, reducing the effectiveness of BTI. High organic conditions also reduce the effectiveness of BTI. An increased frequency of surveillance of larval sources insures that bacterial insecticides can be applied during the appropriate stages of larval development to prevent adult midge emergence.

Impact on water quality: BTI contains naturally produced bacterial proteins generally regarded as environmentally safe. It leaves no residues and is quickly biodegraded. At the application rates used for midge control, BTI is unlikely to have any measureable effect on water quality. There are no established standards, tolerances or EPA approved tests related to BTI. Other naturally occurring strains of this bacterium are commonly found in aquatic habitats.

Chemical Control Strategies

There are a number of chemical pesticides labeled by the EPA for application to lakes and the atmosphere to target both larvae and adult aquatic midges and other insect vectors. WLMA is not considering the use of these technologies at this point.

Training and Certification

Aquatic pesticide applications are very different from terrestrial applications. The team making these applications when necessary are certified and licensed by the California Department of Agriculture to apply aquatic pesticides. All aquatic pesticide applicators are required to obtain in excess of 20 hours of continuing education during their relicensing period. The continuing education that our group seeks out focus specifically on aquatic herbicide use and technologies. New personnel are required to study for and obtain an applicator's license with an aquatic

endorsement. They are then teamed with experienced staff that mentor them in the correct procedures and practices that meet permit, label and environmental requirements.

Oversight/Review of Control

The aquatic specialists that will be part of this effort are trained and licensed to apply aquatic pesticides. They operate under the review of the California Department of Agriculture and the Ventura and Los Angeles County Agricultural Commissioners through their license and yearly registration with those entities.

All aquatic pesticide applications are different based on the pesticide being applied, the rate of application, and the site where the pesticide is being applied. The first step is the development of a specific treatment plan for the site in question on the day in question. Once water depths, surface area and contact exposure time and water exchange considerations are made, an amount of pesticide is selected and brought to the treatment site for application. The application equipment must then be calibrated for output based on those factors and rates. Generally for either liquid or granular application systems, the first step the applicator takes at the site is a flow test. The pump/eductor/blower/spreader equipment is run for one minute and the discharged pesticide is collected and measured. This output is then set and the boat speed and application swath width are set to insure even and effective application.

The applicator is required to complete a pesticide application record at the site after completion of the application. This record notes the personnel present, their licensing information, the products applied with their EPA registration numbers, the amount of material applied and the acreage treated with a map as well as other key information such as presence of pests in excess of established thresholds. These records are maintained as required by the State Department of Agriculture and the NPDES general permit to apply vector control agents.

In addition, a Pesticide Use Report is developed on Department of Pesticide Regulation form PR-ENF-060. This report documents all material used in the County of use, and includes the manufacturer and product name, the EPA registration number from the label, the total amount used and the number of applications per month.

The team will note and report to the CAC and CDPH any conspicuous or suspected adverse effects upon humans, domestic animals and other non target organism or property from the application of any pesticide.

Public Education

This can be a critical part of any vector control operation. Our team works with the Ventura County Vector Control Program in that they have excellent resources for the public in terms of education on these subjects. The VCP provides public outreach in the form of presentations upon request, as well as through media such as newspapers television and radio. Information is provided on biological, physical and cultural methods of control that property owners and managers can use to preclude or reduce the vector and nuisance pests in their locations. That Department maintains a web site at

http://www.ventura.org/rma/envhealth/programs/tech_serv/vector/index.html

In addition, WLMA communicates with its membership through provision of an annual report that documents the program, provides a Lake Management office and staff to field quesitons. The program does not utilize pesticides for vector control that place a restriction on the use of treated water for swimming, boating or other activities.

Public notification will also include information required in the NPDES General Permit under the appropriate sections of that document.

Monitoring and Reporting Program

WLMA is seeking coverage under the General Permit for the discharges of aquatic pesticides to surface waters as is allowed by that permit. As stated in Attachment C of the General Permit, the Monitoring and Reporting Plan or MRP is designed to address the following two key questions:

1. Does the biological or residual pesticide form applications cause an exceedance of receiving water limitation or monitoring triggers?
2. Does the biological or residual pesticide, including active ingredients, inert ingrediants and degradation byproducts, in any combination, cause or contribute to an exceedance of the "no toxics in toxic" amount narrative toxicity objective?

As stated on page 7, in the General Permit, Section III m H "Regional Water Quality Control Plans (Basin Plans) include a narrative toxicity objective ("no toxics in toxic amounts") which specifically prevents the presence of toxic substances, idividually or in combination, in concentrations that product detrimental physiological responses in human, plant, animal or aquatic life. Since information regarding residual pesticides deposited in the receiving water as a result of larvicide applications for vector control is not adequate to develop receiving water limitations for individual and combinations of pesticide, this General permit only contains receiving water monitoring triggers for residual pesticides of concern".

As stated in the General Permit Attachment D, Section VI, B.1.a, microbial pesticides have undergone extensive testing prior to registration. USEPA has determined that microbial pesticides are essentially non toxic to humans and do not pose risks to wildlife, non target species or the environment when they are used according to label directions. Therefore, the General Permit does not include a Receiving Water Monitoring Trigger for BTI, the only formulations proposed for use on this project.

Implementation of nontoxic or least toxic control alternative within a BMP eliminated the need for larvicide residual monitoring.

I. Characterization of Pesticide Application Project for Westlake

Types of sources treated.

Activities of our applicator are directed toward control of aquatic midge in their aquatic, larval stage. This approach allows control activities to be concentrated in localized areas within the treatment area using the least toxic materials. Adult midge will not be targeted using aquatic pesticides. This permit does not cover the use of adult pesticides and no adult pesticide use on or over the lake is contemplated here.

II. Pesticide Use and Assessment of Impacts

Pesticides currently used by our applicator are bio-larvicides described above in this PAP, our applicator when necessary will be using only these products within the lake.

A. Bacterial larvicides consist of spores of certain species of bacteria containing naturally produced proteins, which are toxic to midge larvae when ingested in sufficient quantities. Although they are biologically derived agents, products containing them are labeled and registered by the Environmental Protection Agency as pesticides.

Bacillus thuringiensis var. *israelensis* (BTI), product names Vectobac 12AS, Vectobac G, Vectobac WDG. BTI is highly target specific and has been found to have significant effects only on midge and mosquito larvae, and closely related insects. It is available in a variety of liquid, granular and pellet formulations, providing some flexibility in application methods and equipment. BTI has no measureable toxicity to vertebrates and is classified by EPA as Practically Non Toxic. BTI formulations contain a combination of five different proteins within a larger crystal. These proteins have varying modes of action and synergistically act to reduce the likelihood of resistance developing in larval mosquito and midge populations.

Bacterial insecticides must be fed upon by larvae in sufficient quantity to be effective. Therefore applications must be carefully timed to coincide with periods in the life cycle when larvae are actively feeding. Pupae and late 4th stage larvae do not feed and therefore will not

be controlled by BTI. Low water temperature inhibits larval feeding behavior, reducing the effectiveness of BTI during cooler months. The presence of high concentrations of organic material in treated water can also reduce the effectiveness of BTI. Cost per acre treated is generally higher than surfactants or organophosphate insecticides.

Increasing the frequency of surveillance for larvae can ensure that bacterial insecticides are applied during the appropriate stages of development to prevent adult midge emergence.

Impact on Water Quality: BTI contains naturally produced bacterial proteins, which are generally regarded as environmentally safe. Naturally occurring strains of this bacterium are ubiquitous in aquatic habitats. BTI leaves no residues and is quickly biodegraded. At the application rates used for midge control this product is unlikely to have any measurable effect on water quality. There are no established standards, tolerances or EPA approved tests for this material.

BTI is applied by WLMA in a granular or liquid formulation. Application is by hand, backpack blower, or boat mounted injection system for liquid applications. Persistence is low in the environment, usually lasting three to five days. Kills are usually observed within 48 hours of ingestion.

Relevance of Water Quality Analysis for the demonstration of full restoration following project completion:

Midge control projects are ongoing and do not have a specific duration or date of completion, since the goal is to prevent midge populations from exceeding specific injury levels rather than to eradicate them. As in the above Statement of BMP, surveillance of larval sources is conducted on a continuous basis and treated areas are applied as necessary to prevent significant nuisance or disease risks to the public. The materials used are applied at extremely low doses relative to the volume of the habitat, are inherently less toxic or least toxic materials and are not known to have measurable impacts on water quality. However, existing water quality conditions may have significant impacts on the selection and efficacy of control methods applied.

WLMA and Aquatechnex is forecasting the use of the following products and amounts during the 2012 treatment season:

Pesticide	EPA #	Amount
Valent Vectobac 12AS	73049-38	250 gallons
Valent Vectobac G	73049-10	100 pounds

III. Evaluation of the effectiveness of BMP's to reduce discharges and minimize area and duration of impacts

Our best management practices insure that all available least toxic control methods are considered and that new methods are evaluated on an ongoing basis and if effective, incorporated into our larval control program. Implementation of BMP resulted in the complete elimination of the need to use conventional insecticides (organophosphates and carbamates) as larvicides. Materials used by WLMA are the least toxic available, the use of these materials virtually eliminates impacts on water quality which could be caused by the use of conventional chemical based aquatic insecticides.

VI. Proposed Monitoring Plan

Records will be kept by WLMA and Aquatechnex of all pesticide applications made to waters of the United States. These records shall include the site, map coordinates, name of applicator, flow rate of target area, material, concentration, quantity applied, habitat type, approximate water surface area and the date of application. In addition we will submit monthly reports to the appropriate local agencies.

As stated in the General Permit "The microbial pesticides have undergone extensive testing prior to registration. USEPA has determined that microbial pesticides are essentially non toxic to humans and do not pose risks to wildlife, non target species or the environment when they are used according to label directions".

Aquatechnex will monitor water quality parameters throughout the lake on a weekly basis during the summer months and three times per month during the winter months.

The least toxic control methods and materials used by WLMA are designed not to produce measurable impact on the water quality parameters generally monitored under NPDES permits. In addition, EPA has no standard method for the measurement of BTI formulations in water and as such it is not possible to measure this material in a water sample. BTI formulations do not leave a residue beyond the time frame of the intended purpose of their application. Therefore, routine monitoring of BTI is not possible or proposed.

We will conduct an annual review of our BMPs to reflect any new practices and insure that least toxic methods and materials continue to be evaluated and incorporated as they become available. Any changes or revisions to our BMPs will be reported annually. WLMA will complete with all requirements of the general permit related to pesticides other than those outlined in the BMPs in this document.

