



Water quality standards implicates that there is Basin Plan guidance on pollutant(s). With that, the assessment should be at the point source discharge into the receiving waters and not the condition of the water body in whole.

In § 122.44, it states:

(k) Best management practices (BMPs) to control or abate the discharge of pollutants when:

(1) Authorized under section 304(e) of the CWA for the control of toxic pollutants and hazardous substances from ancillary industrial activities;

(2) Authorized under section 402(p) of the CWA for the control of storm water discharges;

(3) Numeric effluent limitations are infeasible; or

(4) The practices are reasonably necessary to achieve effluent limitations and standards or to carry out

We are unclear as to how it is ascertained that “numeric effluent limitations are infeasible.”

It is funding, personnel, numerous dischargers or another reason.

With many water bodies being used for recreational purposes, we question that BMPs can eradicate a pollutant discharge problem without knowing the scientific data at the source points.

The burden of pollutant reduction should not be at the hands of the taxpayers, but the dischargers.

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