

From: Bradley Kucera
To: [Paula Wilson](#)
Subject: Written comment RE Draft Negotiated Rule for Domestic Water Supply
Date: Tuesday, May 1, 2018 8:34:28 AM
Attachments: [image001.png](#)

Paula,

I would like to submit the following comment for consideration.

I don't understand why the language at 252.01.5.ii must be written so cumbersome. Consider the following:

ii. Increased by more than ten percent (10%) above ~~natural~~ background, measured at a location upstream from or not influenced by any human induced nonpoint source activity, not to exceed twenty-five (25) NTU, when background turbidity is greater than **two hundred and fifty (250)** NTU.

I say this because its clearly not possible to exceed the background value by no more than 10% and still be under 25 NTU of increase until your at a background of 250 NTU or more. Written as it is makes the audience think they are misunderstanding something. I know what this means as currently written as it has come into play many times throughout my career; however, each time I encounter it I have to stop, read, and reread these statements and contact DEQ to make sure I am applying it correctly. There is no need for this confusion and this adjustment clarifies that under no circumstances is the in-stream effect allowed to exceed a 25 NTU increase (even if the background is 500 NTU or more).

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