



WaterPro Inc. *a Draper Irrigation Company*

12421 South 800 East / PO Box 156 / Draper, Utah 84020 / 801.571.2232, Fax 801.571.8054

www.waterpro.net

AUG 14 2008

IR QUALITY

Utah Water Quality Board
Attn: William Moellmer
Utah Division of Water Quality
PO Box 144870
Salt Lake City, UT. 84114-4870

August 11, 2008

Subject: Comments to Proposed Amendments to the Standards of Quality for Waters of the State,
R317-2 – Great Salt Lake Selenium Standard

Dear Mr. Moellmer:

We have reviewed the proposed Amendments to the Standards of Quality for Waters of the State, proposed for Rule R317-2 of the Utah Administrative Code. We desire to submit comments on the proposed standard for selenium in the open waters of Gilbert Bay. This issue is important to us because of the need to protect the Great Salt Lake ecosystem and the need to provide for increased public water supplies for the rapidly growing human population in Salt Lake Valley. Specifically, the demineralization of water sources in Utah and Salt Lake counties would produce by-product water which may feasibly be discharged to Gilbert Bay.

We note that the proposed selenium water quality standard consists of two components. The first component is a tissue-based standard of 12.5 mg/kg dry weight, using bird eggs. We agree with this proposed standard, and appreciate the extensive studies that have been performed over the previous four years to arrive at this number.

We also agree with the second component, that of establishing assessment procedures for Gilbert Bay waters which would allow for monitoring and taking increased actions if selenium concentrations are found to increase toward the standard in future years. However, we disagree with the proposal to place caps on selenium loading in the Great Salt Lake discharge permits at 60 percent of the proposed standard level. We see this as a de facto selenium standard placed at 60 percent of the number derived through appropriate scientific studies.

We request that the implementation of annual selenium loading caps at levels below the selenium standard not be included within the proposed assessment procedures. We appreciate the opportunity to comment on this important water quality and standards issue.

Respectfully,

Darrin L. Jensen
C.E.O./General Manager
WaterPro Inc.



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