

Water Quality Standards Antidegradation Subworkgroup
 Draft Action Items from May 9, 2011 Meeting

Attendance:

Chris Bittner	DWQ
Jeff Ostermiller	DWQ
Leland Myers	CDS
Reed Oberndorfer	CUWCD
Nicholas Von Stackelberg	DWQ
Mike Rau	CUWCD
Lisa Kirschner	PBL
Lareina Guenzel	EPA 8

1. Deleting all of the examples in R317-2-3.5.b.1. versus deleting just the example disapproved by USEPA was discussed. Mr. Meyers recommended retaining the examples with the exception of the disapproved example (d). The group agreed to delete only example (d) because the other examples remain valid and Mr Meyers believes that their retention in rule is important.
2. USEPA antidegradation policy recognizes that discharges that are temporary and limited are permissible for USEPA Tier 3 waters (Utah Category 1 and 2). The temporary and limited exemption was revised to be more consistent with USEPA language. In addition, the temporary and limited exemption was added to Category 2 waters.
3. Renaming Utah's Categories to mirror the order of the USEPA Tiers was discussed and implemented in the rule.
4. Rearranging the ADR Policy to a more logical sequence was discussed. Concerns were raised that the more that was changed, the more likely the rule could get bogged down with comments. Therefore, the group decided to limit the changes for the time being to those discussed in items 1, 2, and 3.
5. The January 2011 Draft of the Implementation Guidance was reviewed. The May 09, 2011 draft shows the changes made to the guidance. The changes made at the meeting are shown in a different font color than the previous changes. Ms. Guenzel is vetting some of the changes with USEPA management regarding the social and economic benefits of POTWs and her findings will be shared with the group. Ms. Frey was not in attendance but had previously expressed concerns with the changes.
6. Ms. Guenzel and Mr. Meyers submitted suggested changes to the application. These changes will be incorporated in the application in addition to other DWQ changes and distributed to the subworkgroup for comment. The intent of the application is to simplify the process for permit applicants and is not a regulatory requirement.
7. Integrating the pretreatment program with ADR was discussed. Currently, the issue remains unresolved.