**Follow Ups from May 20 Meeting**

**RWG Discussion**

**1. Variances**

* Neil: Differences between ALC and HHC -- implications for application need to be reflected in the rule.
* Neil: search and replace the word “variance” with PMP/Pollution Prevention Plan as a possible solution to the stigma of the word
* Variance Duration:
  + Peter said that if a permit is administratively extended, that DEQ can’t legally re-open the permit (I think this had something to do that if during an annual review we found that we needed to adjust something)
  + Neil: Permits w/ variances would float to the top of the priority list w/in a year of expiration
* Existing Use
  + Need to fully define the meaning of existing use—no further degradation and what is DEQ’s “standard of review”?
  + Ken: Need to clarify capacity of trading w/in watershed to help with this
* NPS BMPs—Ken: Add language regarding the possibility of using trading (not a requirement because of issues w/ contractual obligations, per Kathryn)
* Address in the Decision Memo OR’s use of GLI
* New Facilities
  + Nina/Peter: Strong objection to “net environmental benefit”. Too open to abuse and misinterpretation
  + Define what a new facility is—new facility covered by an existing permit, new discharger??
  + Kathryn/Ken—DEQ should consider other types of industry that could bring business to OR

**\* RWG members need to send comments/revisions to Andrea by June 3.**

**2. Pollution Prevention Proposal**

* More rationale is needed from DEQ, EPA, and ACWA before the proposal is brought before the group again in July (will need to meet/discuss beforehand)
* How does RPA fit the “occasional hit”/Tier I scenario (EPA, DEQ)

**3. June/July Meeting**

* Variances (last discussion)
* De Minimus (last discussion)
* Status of Tools Matrix
* Pollution Prevention Plan
* Delayed Implementation

**Non-NPDES Discussion**

Sorry folks, but didn’t catch any more specifics than this…

**1. ODF/ODA Interactions**

* Follow up Items?

**2. Antidegradation**

* Work group members didn’t get to vote on DEQ’s proposal
* This was the last scheduled meeting on this

**3. Implementation-Ready TMDLs**

* Get any comments to proposal to Gene by June 3

**4. Division 41**

* Get comments to proposal to Gene by June 3

**5. June/July Meeting**

* Pretreatment sub-committee
* Sediment and toxics
* Implementation-Ready TMDLs

**Developing Agendas**—Who, What, When, Where (were we going to propose an alternate location at some point?)