ISSUE PAPER OUTLINE:

Implementing Water Quality Standards for Toxic Pollutants

in Clean Water Act Permits

I. Introduction

Context – revising wq criteria based on higher FCR

 Purpose, Why we are doing this now

 Policy statement (language recommended for EQC adoption)

II. Background

 Description of the problem, why we need to do this, what we’re trying to solve

 Objectives, what we’re trying to accomplish

 Principles and desired outcomes from the discussion paper – probably pared down

 Process, 3 gov. cooperative effort, stakeholder input, etc.

III. Description of Tools and the circumstances under which they are applicable

 1. Summary of applicable tools and key information (table?)

 2. WQBEL that would be met via: a) treatment, b) source reduction or c) trading

 *The following subheadings repeated for each tool:*

- *recommendation*

*- rule language*

*- applicability*

*- authority and precedence*

*- implementation information*

 3. Compliance schedule to meet WQBEL in specified timeframe

 4. Intake Credits

 a. RPS procedure

 b. WQBEL calculation procedure

 5. Trading and Offsets

 a. for meeting criteria at point of discharge

 b. for meeting wasteload allocations after a TMDL is completed

 6. Variances for Individual Dischargers

 7. Variances for Multiple Dischargers or a Water body

 8. Background pollutant concentration rule – a multiple discharger variance

IV. Water Body Standards Revisions

 1. UAA

 2. Site specific criteria

3. DEQ will continue to explore the idea of a temporary or “restoration” standard for a water body with EPA to determine whether there are situations wehre this solution would be appropriate.

V. Tools not Recommended

 Description

 Why not being pursued