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| **Action Items to Prepare for February RWG Meeting** |
| **WHAT** | **ADDITIONAL RWG DISCUSSION** | **RESOLUTION** | **NEXT STEPS** | **COMMUNICATION** |
| **Intake Credit Rule** | No | -DEQ going forward w/ existing rule language-resolve/justify legal issue: Why doesn’t EPA consider the ICR as a standards provision? EPA: Not a standards provision as long as the WQS is met at the end of pipe or MZ if not WQL. DEQ: need to revise the boilerplate language in the permit to allow intake credits in meeting QBELs.  | Call Michael—**Deb--DONE**E-mail RWG—**Melinda/Jannine** provide response?Wrap up remaining revisions--**Spencer** | e-mail RWG w/ final language in a separate e-mail (along w/ other final products) indicating no other action needed--**Andrea**Work w/ Larry/Jane on permit language--**Spencer** |
| **HHC Schedule** | No | -Proceed with Option #3 (separate HHC sched. Language)-Check existing reg lang for consistency-Check gaps for implementation for pre-TMDL timeframe and pre WQS effectiveness | - Confirm Neil wants to proceed w/ this option—**Spencer/DONE**-Call Michael—**Deb**-call Nina—**Neil/DONE**-call Deb Smith (CA) for input on what they’ve been doing—**Deb/Jennifer-DONE**-revise language to reflect current reg. language, but only refer to HHC -- **Spencer** | e-mail to RWG w/ final language in a separate e-mail (along w/ other final products) indicating no other action needed--**Andrea**Find out if Jane needs to review our rule language before going to Larry at DOJ—what’s her role? **Andrea/Spencer** |
| **Variance White Paper and Reg. Language** | Yes | -How much detail do we want in the regulation, IMD, and white paper?-Does DEQ want to pursue a MDV?-specific issues and questions that still need resolution | -Meet w/ Nina to get her opinion and discuss her concerns ASAP—**Andrea** - **DONE**-Receive RWG comments by 12/18 and incorporate if applicable—**Andrea**-Incorporate comments, as needed, from IRT meeting on Jan 6 —**Andrea**-incorporate revisions as needed in the regulation and white paper-Schedule 3 govt meeting for 1/8—**Andrea**  **DONE**-Issues to bring forward to EPA HQ? **IN PROGRESS—waiting to hear on NPS and existing use questions**-Develop an options paper for a RWG variance conference call and provide opportunity for comments | -e-mail straw poll: send reg language ASAP to RWG and ask for support (1 – 5). If 4 or 5, explain hesitation/concerns—**Andrea**-- **DONE**-Enables DEQ to understand major issues and evaluates ability to address them.-send conference call e-mail to RWG for Jan. 13 or 15—**Andrea-DONE** |
| **Background Concentration Allowance** | Yes | -implementation plan for DEQ and EPA approval-what does 5 yr review mean?—Melinda & Jannine(MI MDV—EPA needs to do a review every 5 yrs.) | -ID likely pollutant categories (303d list?)—**Deb**-develop 1 pg. paper describing process 12/31—**Andrea/Melinda--DONE/IN PROGRESS**-EPA to explore justification based on HH use—**Melinda DONE/IN PROGRESS**-develop multiple pass cooling alternatives 1 pg. paper 12/31—**Spencer** -determine approximate number of multiple pass cooling systems in OR 12/18—**Spencer** (sent out e-mail request 12/11) **DONE** | -call Michael to help w/ ID of pollutants—**Deb** |