

From: [BACHMAN Jeff](#)
To: [ROOT Jenny](#)
Subject: FW: Input from WQ managers on "new" revisions to Div. 12
Date: Tuesday, January 07, 2014 12:40:03 PM

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From: NOMURA Ranei
Sent: Friday, March 22, 2013 5:56 PM
To: CARLOUGH Les; BACHMAN Jeff; BROWN Courtney
Cc: HICKMAN Jane; ADES Dennis R
Subject: FYI: Input from WQ managers on "new" revisions to Div. 12

Here is the latest feedback I have on the proposed revisions that were not discussed with the regional wq managers. I have added them to the spreadsheet being used to track these issues but have not had time to add any elaboration. If anything else pops up, I would appreciate knowing so I can add it to the spreadsheet and keep Greg Aldrich informed of our progress.

1. The NPDES 1200-C violations moved up in the matrix.
Stormwater managers proposed an alternative. It would be good to get feedback from OCE on whether their proposal is acceptable.
2. 700PM violations and have been moved up in the matrix.
Steve, WR would like more discussion. It would be useful to understand from OCE's perspective why this increase is being proposed (what problem are we trying to solve?) because a majority of our suction dredgers are retired citizens and this is such a hot button issue in the legislature right now.
3. 340-012-0140(2)(A)(e)(iv) and (v) – "major" dropped from description of food processors and mining activities
Steve, WR and Cheryl, ER would like more discussion. At first glance the change does not look like it's a big deal but it does have significant ramifications – 37 food processors would be moved to the \$8,000 (\$12,000 proposed) matrix. Regulation of food processors is a hot button issue in the legislature right now as well due in part to ER's ongoing enforcement efforts with Top Onion. It would be useful to understand from OCE why this increase is being proposed (what problem are we trying to solve?).
4. New 401 certification matrix classifications
The only concern here is that Eric Nigg really did not seem to be aware of these revisions. Since he is out next week, I sent an email to Marilyn and Bonnie to make sure he isn't going senile. This one should resolve quickly once he returns from spring break.

5. Reclass of failure to implement SWPCPs
No agreement on reclass to Class I.

For #5, scheduling the regional stormwater managers and Denny in a meeting is problematic since it looks like Keith *could* be on jury duty that week but I will send a meeting request for 4/1 at 1:30 pm to reserve the time just in case he doesn't have to serve.

For issues #2 and #3, I will send out a meeting request to the regional permit managers and Denny for 4/2 at 3 pm.

Neither of these times look good for Les but maybe it will give him a reason to leave his nuisance workgroup meetings?!?

Let me know if there is anything else you need. Thank you!