

From: [BACHMAN Jeff](#)
To: [ROOT Jenny](#)
Subject: FW: WQ Div. 12 Changes
Date: Tuesday, January 07, 2014 12:31:14 PM

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From: NOMURA Ranei
Sent: Thursday, October 25, 2012 11:07 AM
To: BACHMAN Jeff; BROWN Courtney; KOSS Leah
Cc: LOBOY Zach
Subject: RE: WQ Div. 12 Changes

I have been updating the WQ spreadsheet as time allows but I haven't put in the notes from our latest discussions on #1 and 2 below that I've had with the managers. I will forward a separate email on the subject so you have their thoughts on the subject.

From: BACHMAN Jeff
Sent: Wednesday, October 24, 2012 11:42 AM
To: NOMURA Ranei; LOBOY Zach; BROWN Courtney
Subject: WQ Div. 12 Changes

After the meeting we had last month there were two proposed changes where there was no consensus. These were:

- 1) Add "causing pollution violations" on sites that are not required to obtain an NPDES permit because disturbance is less than one acre to a lower matrix: \$6,000 (OCE proposal) OR \$1,000 (WR proposal)
- 2) Make "failure to implement a stormwater plan" a Class I.

I finally got a chance to talk to Leah, and also bring Courtney up to speed after her return from post-nuptial vacation. Leah thinks we should defer further discussion on 1 until we have more information on what the new matrices will look like, although she does think that it makes sense to place commercial operations and to residential owner-occupants on different matrices. Regarding 2, Leah supports making failure to implement a plan a Class I, but to make violations that occur when there are no benchmark exceedances a "B" response (warning letter) in the guidance.

With Courtney back, I am turning over the lead in OCE on these suggested changes to her, but I am happy to still participate in the discussions.

There is also the question of whether we want to examine which matrices the WWTPs and MS4s are assigned too. I suggest that we table that discussion until we have new proposed matrices to

look at.

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