

Paula Wilson

From: Lawrence Bennett [l.j.bennett.engineering@gmail.com]
Sent: Thursday, December 30, 2010 11:55 AM
To: Paula Wilson
Cc: Michael Fuss; Greg Pearce; ROBBIN FINCH; Lawrence Bennett
Subject: comments on draft Anti-degradation Implementation Procedures Section 6

Hi Paula,

At the December 10 meeting, comments were solicited on the Section 6. I have a few comments for DEQ's consideration:

1. On page 54, in the second paragraph, it refers to existing general permits ". . .(that are currently in effect, not expired) . . .". I suggest that this needs to be defined as of a certain date, like June 1, 2011. Otherwise, there may be some issue about a GP that is issued in the future that somehow got approved without the Anti-deg review.
2. On page 55, under **Existing Activities or Discharges**, in the first line, the word "currently" again appears. Same comment as above.
3. On page 55, under **Existing Activities or Discharges**, the last sentence is confusing. It reads "It still needs to be determined that water quality standards will be met and thus Tier 1 antidegradation review requirements met.". Does this mean that the next time the GP is issued, the anti-deg requirements will be reviewed? If so, that is already discussed in the earlier paragraphs. I am not sure what this sentence is meant to mean.
4. On a general note, I suggest that Section 6 be moved to become Section 2. If it is Section 2, applicants would not have to review the entire document to determine that they are not required to submit anything. An applicant would read this section and determine that the GP covers them and that would be end of their efforts.

Thanks again for your efforts to develop a usable document.

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