

Major Topics / Decision Points in Antidegradation Implementation

1. What is the scope of antidegradation review, what activities does it apply to?
2. Are there exemptions to antidegradation review?
3. How do we approach antidegradation review - waterbody-by-waterbody, pollutant-by-pollutant, source-by-source, blend?
4. What is the trigger for Tier II analysis - new or increased discharge?
5. How do we determine if there will be degradation / lowering of water quality?
6. Is there merit to having a significance threshold for Tier II analysis?
7. How do we assure that required PS and NPS controls are in place?
8. How is the alternatives analysis showing the necessity to degrade going to be done?
9. How is the socio-economic justification showing importance of the discharge going to be done?
10. How will general permits be handled?

Antidegradation Implementation questions that may be more fully addressed in guidance

- Describe CPP intergovernmental coordination and public comment process
- Restoration projects – describe types of activities that qualify for restoration – size or extent of a restoration activity - how exempted activities fit into permitted facility monitoring – explanation that restoration exemption from antideg is based on expected improvement in water quality but does not relieve project from other CWA permitting and certifications
- Examples of Emergency Actions. We heard of the sewage force main crossing a river that breaks or is damaged and the tanker truck spill into the river. Is there after the fact review?
- How is measurable and adverse determined?
- How is degradation / lowering of water quality measured for narrative criteria?
- What about parameters that are a concern at un-measurable concentrations, e.g. dioxins?
- How are expired permits handled?
- Describe interaction between DEQ, proposed discharger and 'designated management agencies' for non-point source BMPs