15 APR 91 WEEK 74

1. Travel memo for Denver trip to Ronnie
2. Travel authorization for Oakland trip (18 APR 91) to Ronnie
3. Talk to Dave A. about GLORI meeting (last week)
4. Talk to Larry about GLORI; Peter / Al Tech. Team meeting; Ryan / WRS contractor position
5. Read mail
6. call Kent address change + 401(K) statements
   - fill out change of address form (Anna receives 1st floor)
   - Stephanie Lawrence (8th) for Thrift Savings statements (left tomorrow)
7. sign-off Ralph report (no review)
8. sign-off Butler & Farnsworth report (no review)
9. sign-off NEA 50 - Westerly (no review)
10. sign-off Offord report (no review)
11. Unit Meeting
   a. Wayne Davis out but full of info Gore by Monday
   b. Wally actuary reports: going ok; still short on fish
   c. State updates
      - WI: TRT is dead; probably no immediate impact on GLORI
      - IL: MZ + prairie actuary - wholesale gutting of MZ (25 acre default); conf. call tomorrow (Pete Rowe)
      - Indiana: people coming in 23 APR to talk; Marsha upset
   d. 2nd quarter highlights - Barry has it; Peter, give to Ronnie (Barry will finalize) (2 week notice - waiting)
2. monitoring issues: arrangements made for monitoring (Lee division) Monitoring Meeting by June; Cuyahoga Falls case of HQ Rec Tomorrow about 303 (b); Corrie had meeting today;

11. f cntcts (Invited by Ronnie (book w/ Pat on 21) (in & out)
(Can loc finish. 2 to Ronnie)
-after meeting: monitoring x Lorain; maybe others (on 18th?)
(will figure out rules)
-Need time for contacts (Chap heads)
9. 4's Certification and 11: State Coord.: copy of State Auditor
+ ½ page summary
h. Friday: audit: answer questions; copies of related to Hoy
i. training: only if really necessary
j. mid-year evaluations (April)
k. happy to have 3 people (2 state coord. + help for State)
l. travel vouchers
m. State program plans distributed; mtgs scheduled
n. Regional WQS Coordinators: Dave Ellis
o. vacation schedules to Dennis soon
p. move to new building (check w/ Margaret)
-monitoring group on 11th floor (Okun)
q. team starts staggered hours; ask Dave
12. Chicago to Cuyahoga FRN for the Town; to ORC for sign-off

16 APR 91
1. Dan-mail
2. Rose Freeman: not in until 22nd.
3. WQS Coordinators file for Barry
4. FRN from ORC to Ron Thomas (sig for Dale); to Monica (Ted)
5. left message for Richard Tamblyn (216) 488-3484 (return call)
6. organize files for WQS Coordinators position
7. Lunch: copy, call 1:00 tomorrow w/ Sue & Dave M.
-possible trip to Duluth on 25-26 APR w/ Dan

P. Hadden: Larry: Core Terra language package from OEPA
-talked to Dan Dudley about Wayfield use: large
-copy of inventories to Ron
9. Mark Maloney: interested in being RAP Coordinator for Cuyahoga RAP
-talk to Barry & Janet
-send info to Mark
10. Richard Tamblyn (Cuyahoga Utility: East Ohio Gas) 216-488-3484
-pit in Parma Township w/ float ash from Cleveland Electric Co. (Lamping); Lake Co.: west of Hardy Rd. (Painesville) (Eastlake Gen. Station)
-spoil from Lake to Jim Brown plant; now filling in old
-disposal from boilers: 45 tri-axle dump trucks
-hauled to L. Erie Disposal
-Mitchell Transport is the CEI
-Dairyport Nursery Rd.; between AI Smelting Plant & Mitchell Trucking Plant
-Lyle w/ 100' of gasoline
-just west of Bay Trucking Plant
-will call OEPA; also notify Grace Gallagher
Creek Road; talk to Rhoda Cook (Akron EPA)
-disposal type pack to be to Pt. 84 (553)
11. Grant C. & Barry DeHoff: not in

17 APR 91
1. WQS Coord. files
2. Meeting in RA Conf. Room on Ecological Assessment; Ecological Indicators;
-want as point for 305(b) guidance (originally 15th)
-NPDES Strategy permits strict water conditions against future effluent discharges
-being discussed at Reilly & Robert
-PLAN follow-up work for 305(b) analysis (Lunch)

2. purpose of 305(b): report on status & trends; must 305(b) report to HQ
- monitoring has been discouraged by HQ
- OWE funding, mod w/ R5, OH, IL: use as model for use of station
(States, + maybe Regions) (Gail?)
- IL further analysis of trends (Gail?) find reasons for trends
i. use of uncertified and field for trends / points where unbiased
ii. aquatic life monitoring for most large use
iii. Compare area data from 208 stations since 1974; funds
for WQS - last cat. added other info. to get handle
in want to marry w/ GL efforts (LMMB?)
- OH: (Chris Yoder)
- road calibration study for Lake Erie marshes & Ohio R.;
monitoring already started
- should be no restrictions on policy as emphasis
inside
- 305 = 2 people/yr. 11/30/FTE - less program/water
- need more attestation from OW
- want to expand from IL+OH to R5 to make nation. build up
gradually - the fill in gaps
- briefing for Bill H in 2 weeks; another briefing for Region in
June
- use for FY88 AP - go with data for Global Warming (Carol);
need empirical data on environmental effects now ready
3. talk to Russ Thom (w/ Larry) about FRN: will be signed today
4. sign-off Lansing permit (no review)
5. sign-off Montgomery Co. - Eastern Regional permit (no review)
6. talk to Janet & Larry

5. - must decide if Lake should be at MO Clean negotiations after
TA meeting (Bill Jordan or FR)
- grant Mahony for NAP coordinator (Janet: must be in Regional office)
- Friday meet w/ Rob / Barry / Jan etc. about RLWTF
7. Dave M. + Lucy
- Duluth made RL list of 146 FAX to Duluth + Dave M.
FAX: 218-720-5539 DVL
612-297-1456 MN
- 12 BAT/BAK left. to do: finish, 18/150 of 66 not done
- prioritize chemicals for us maybe
- 28 AAK 91 FRN: Done to Duluth; probably must re-read
- want have as many BAFs as would like - just will have
some
8. FAX memo of pollutants to Dave M. + Larry Buckbee
9. Pick up signed FRN from RA's office

18 AAK 91

A. Cuyahoga Modelling (Chadat: USEPA, OEPA, CCC (corps), NEORSD, etc.)
1. Peter (Gary Martin)
2. Mike Gray: presentation of data, etc. (Hardcat)
3. Andy Dennique: modeling
- free flowing portion + Channel: DYNHYD + WASP4 (4 parts)
- resuspension rate calculation problems
- possible 3rd decay rate survey: try to get lower flows
- work on hydraulics only so far (Depelyds)
- Mike involved; but difficulty in communi w/ State; need
State help more (Gail to Gary / Mike Wade)
- Help work up Betz + post & final hydraulics
- should determine figures & briefs after interagency - may
be better to wait for order to manage about (V. Master)

- LTV: 2 other plants
Caller near NH_4 + CN distillation

14 1991 Field work (Charlotte)
- OEA, DNR/RI is doing survey on Cuyahoga Basin this year, at mill
- TOC + Vol. Sol. + maybe other analyses by NEAS (split samples), if possible; maybe bacteria

5. CSO Status (See Stumpf)
- 6 outfalls active; none on Cuyahoga; close because high priority + small morph for recombination (Cuyahoga not appropriate, [discuss when ready])

6. At the meeting week of 29 MAY 91 (22nd)

B. Statewide Issues
1. Update / Review (good status) from Bob Weitzman
2. WLA rules [9 variances out to hearing]
3. Cuyahoga Use Designation
- FRN signed yesterday; copy to State; issue moving forward as top priority
- rule is procedure now (Federal); HQ thru OMB
- have authority to promulgate w/o EPA
- G.M.: agree w/ process as is; keep planner track but don't pull trigger
- 1/2 / year different status State + Federal
- State Basin selected to face forward; different strategies
4. WLA feedback from State: what should we do in response
① - renew policies / keep procedure for considering w/ Bob + Bill + State
③ - first check on important WLA as listed
② - make sure permit consistent w/ WQBEL
- highlight deviations from procedures on WLA (Jerry)
- audit party in past - might be useful - re. delisting all.
- could also go through procedures if need at DEPA

5. Biocriteria
- agreement on biocriteria influencing implementation procedure
- agreement on biocriteria taking procedure for aquatic life use designation
- timing of rulemaking
  i. funding (moratorium) (see bill on points: mod $ 6M)
  ii. attention to biocriteria
  iii. 25 APR 91 deadline: may need to disapprove + set up schedule
- will look at procedure at beginning w/ rulemaking
- will look at [illegible] last timing for rulemaking

19 APR 91
1. Brief Bruce + Janet on this meeting; talk about PLANT
2. Brief Ron on this meeting; talk about PLANT (Ron, Bruce, Lesley, Jerry, me)
- biocriteria
  i. may be difficult to operate use designation from permit - THE ESSENTIAL THING
  ii. copy of language, our letter, that letter to EPA
  iii. may be better to disapprove the good than long - make sure letter discusses that biocriteria good, but misapplied; discuss continued negotiation
  iv. deficiency from Val for disapproval; this and FRN: 2 deficiencies
- Cuyahoga discussion
- Program Plan: concerned about Valley WRS no time (draft guidance: not through OMB yet; may be diff.)
- GLWQA discussion
  - provide R3, 5, 2, HQ discussion of EPA position
  - slowly ongoing State (OMB) + Canada no word on EPA position
  - permit + statewide meeting discussion - tell THEM that State is [illegible]

22 APR 91 — WEEK 75

1. on meeting list for sediments workshop in R.I.; TA info. to Ronnie
2. Clear mail
3. Travel Orders for 1 MAY 91 Cleveland trip to Ronnie
4. sign off on Oxford permit (no review)
5. pass on ORSANCO fish tissue info to Dave A.
6. call Dan Dudley about fish Cst (left message)
7. call Stephe Lawrence about shelf Lasing (left message)
8. memo to Larry summarizing FRC meeting on GLWQI w/ figs
9. talk to Larry about STARS; annual appraisals; ~~RIA~~ meeting training
10. look over annual appraisals info; call Kristin Robinson (475-7305)
11. copy of memo from Bailey to Hall
12. draft memo to Dave Salisbury on GLWQI: Larry to RK for sign off
13. memo w/ WRS Coordinator info from Larry
14. read 91 APR 01 GLWQI update + figs

23 APR 91

1. Clear mail
2. file WRS Cord. + general materials
3. read 2nd draft 91 Appropriations for Planning + Standards Development
4. notes/memo from 07 MAY 90 meeting (conf. call w/ R.T., A.T.S.) to Jim Dietrich
5. Stephen Lawrence: call if don't get statement after end of May
6. Hedges: emails received
7. Employee Assistance Program 3744 230 GLNPO (2:15)

24 APR 91

1. file WRS Cord. files
2. talk to Jane about transfer from GLWQI — everything ok
3. Bob Wolgren
   - will FAX OAC 3745-1-32 (401 Cert. authorities)
   - Wickford Pwr. Serial series — he will send corrected re submission
   - Rochester: we probably can't extend deadline — may have to disapprove; may amend FRN to include; still looking at possibility of non-rulemaking fix
4. 401 Cert. info. for OEPA to Larry
5. GLWQI Ltr to Dave Salisbury: signed off by me, Barry, Barry, Doug Glass; clear w/ RK before sending; to Larry; faxed 24 Apr
6. file general files
7. copy of GLWQI "memo to Larry" to Barry; message: meeting on GLWQI today at 2:00
8. talk to Tim Henry about GLWQI memo (memo) & his radio comments
9. talk to Dave M. about his Duluth trip Tuesday; RD Fwd.
10. Mail: out today - file
11. Pete Redmon: sweep of some of Libby; if file; meeting some time
12. OEPA Wickford Pwr. use designation change - looks ok as UAA - note to Larry (w/ package)
13. Dave Meachum: where did "mixing of pollutants" originate
    - things list: groups + specific issues
    - may want to format + distribute; future of GLNPO; 30 + 12 mgle
14. Read FR 90 + APR 91
15. Dan Smith, BCM Engineers, Plymouth Meeting, Plymouth Meeting, PA 19462
    - wants ohio WRS; to Bonnie for copying + mailing
    - publish w/ PA copper standards
16. Larry: meeting w/ Ron Bonn, Barry, Barry, Dave, Tim: memo to Salisbury cover; OEPA memo from Barry re Interstate Quality; not sure if input from Ohio

Rattle [illegible] 10th of each month
E-MAIL

25 APR 91

1. meeting w/me, Larry, Dave P. to discuss yesterday's meeting
2. meeting w/Barry, Larry, Dave P. on yesterday's meeting
- Lake work strategy? cancel (Bill Cooke)
- discussion of satisfaction of Barry's concerns? needs doc
- inform TWG of State and Lacie? not discussing
- further meeting between sectors? no further meetings
- write up in SIP: Judy; WL; BAF; Lamar Baltz
- my role in SIP: WL/BAF/support of Lamar Baltz, review
- next: Barry → Jon on what State does during
3. Jon + Ken: go to Duluth since Sue not + Dave M. thinks ok
4. confirm w/Dave MacCluntzy + Larry Burkhard
5. arrange travel to Duluth
6. Sue Elliott: call everyone; pressure for Duluth & WI to complete on time; 85 LL; 30 Lake St; Rennie
7. Jon Bernda: make complete a picture as possible of what Duluth will provide (use read BAF's for all WL + L.L.) + reasons for any problems or shortfalls
- tell WI that we need to know status of 750 for Superior Wilcke Burdge next week
8. sign off Lambert permit (as written)
9. sign off Ambert grant (as written)

26 APR 91

1. Meet w/Bill Cooke, Dave M., Chuck Stoltz, Larry Burkhard
- will have to prioritize - can't get all
- explore RCRA for WI TKE's? (production probably pretty good)
- all human health (124) w/2 exposure routes (Lake Superior + Superior) - issue that will be ready through the publication. Strategy of Lake Superior
- update that will be ready through the publication.

Bartlesville 780-5780

- liquid data: meeting w/ Lawrence, by Lake; looked at Duluth, will look at WI, Gilbert L.L.
- cut off for products: BCF 100 (7.58 lipid) in Duluth Document draft)
BCF = 230 if based on food consumption
BCF 308 in another document (Gilbert Lake)
food consumption BCF = water BCF (more?)
- got list of calculated BCFs for various of Bill from Bartlesville - for use in Steering Committee + Red Cedar River until Duluth + MN have list finalized
- to lipid vs studies affects BCF value; log Kow calculations as constant through
- Ursin (NCASI) comments; Dioxin data was used + needs to be looked at (Larry can do); should it be surprised that there will be differences; trying to show that predicted higher than observed; Duluth Lake validation work now showing good correlation - will be sorted out in next 6 months (or BAF Coordinating Committee)
Veith equation and products of BAF BCF is compiled by Cleveland, AL - once estimates filled due to metabolism, as appropriate
- also commented on Thomann model: vary assumptions by 10% + and results will like a lot + one of the models use other assumptions, but doesn't have anything better
- argued by Larry after public comment - or rewriting

WEEK 76

29 APR 91

1. travel number for Duluth trip to Rennie
2. talk to Larry + Dave about Duluth trip
3. call Cynthia Hall: left message
4. call Jack Lotkin: nothing going on; HE did interview in mid - will update criteria + TC with both [illegible]

(Hardcastle)

5. int-/EIS update agenda
6. NMFS Lawsuit (Dan Turner, Larry Shepard, Jim Gladden, Bob Lee); Consult. Int. Tom Bean, Bruce Reed, Dave Vogel (OW), Bruce Mentor, Rosa Dubois, DEC, Kay Allen (Water), Jim Slaquenburg (Judge), Bob Logan, Dan Vo... in case I gave old not a list the bypass

- WQC: failed to approve or disapprove TMDLs
- constitute submission of these as actual submissions
- NMFS amended complaint
- did we approve State submissions in 1985? - hard to tell; Tom D. says no; Bruce R. says did for WQ; Jim G. says more data in if WQ-limited; Bruce R. says we will see if we have list & know if WQ-limited, in light of fish advisories, etc.
- probably not in compliance w/ requirements to approve WQ-limited segments and TMDL
- no per se approval or disapproval 303(d) Report as 303(d) submission; may be could characterize
- Letter 305(b) Reports (post '85) include improvement of L. Lakes
- Can 118 be in lieu of 303(d) (Ray Allen) - in Congress and what?
- Could declare WQ-limited & setting schedule; Jim G. & V Lent want to see list to schedule; needed best a letter agreeing to discuss 303(d) listing applied to 2/4
- 1994 deadline for L. Mtn. LaMP; TMDL process follows
- State formal 303(d) submission in starting 1992
- WQC is imposing, follow to TMDL or EA?
- great for us if must have to enter dialogue
- may still probably have in court; settlement push, battle
- Summary project (Van Pitts will do) (Ray Allen)
- letter to fight as delay tactic (Tom D.)
- if has, could be at least to most schedule for TMDLs (worst case)
- Alaska case decided (was lost) (Rob: appeal to 9th)
- DOI: use keep losing these cases, in final way, forcing States to identify waters & do TMDLs (2 processes)
- Oregon case: court ordered to do TMDLs
- Judge Rhea will try to not settle; will probably find out about settlement offer
- Van Pitts motivation is to discharge (WLA should be off site LA causes/procedures)
- Stipulated Summary letter that covers 303(d) (Ray Thayer)
- will Rhea publish decision which might modify EA? (Tom D.); Undecided; good language in past; limit in future
- next three DC questions/problems will say appeal, stayed, does additional degradation mean that info. after 1987 filing is admissible? Are we arguing case as exists or exists (unknown) Could argue 1992 date; OMB response unknown
- April, 1992 303(d) input; will be State submittals
- should require all waters listed; can prioritize based upon TMDL schedule
- DEC will draft letter this week; May 20 deadline w/ court
1. Lee Gilbert: meet w/ Jim Gladden meeting; call Rick Balla
2. [redacted] Carol Shady: left message (need DEC list)
3. Rick Balla: [redacted] left message
4. Cancel
11. move to Dale summarizing DEC's to-do list meeting (IPANA) for call w/ Bruce Schroeder

30 APR 91

1. clear mail
2. Contracts must deobligate: July 20 Again Dept 1 changes
   - Dave Nolan IRCRA 285-4510
   - Bill Berry HQ 285-3882
   - Pat Wilcher HQ 382-7945
3. Cuyahoga sampling summary to Byron Jones + Larry L.
4. Antelope summary (OEPA) to Larry for HQ
5. Letter FOIA for ORSANCO to Barry Harvey for assignment
6. Cynthia Holt: left message
7. note to Larry to tell Rick Bolla dont DOE list
8. Quint Meeting
   - less money, more goal to Larry
   - narrative sectional near to Larry
   - QA report info to Byron Stanley
   - antelope implementation to Larry; copy to me
   - Data Quality call memo from Gh (Cleveland) to Randy
   - Document file (Connie)
   - mid-year reviews: not made: sign up sheet on door
   - portable + cordless - tell Connie
   - Section party at Jack Cawood: June 8
   - Standards work plan from Brenda Pace: paperwork not just 1 more + reviewing person
9. Review 305(b) guidance + Bob Bayer comments
   - question: does guidance address use of 305(b) report in 305(j) requirements? (ask Geoff)
10. Blank Xerox info + follow back from Janet Cawood
11. Debuff memo Agenda (MT) 4752 to Cathy
12. DSAT left from Barb Brady
13. Cynthia Holt: write up of 08APR91 conf. call + draft memo should be in record; if not, Cynthia would like to have why + any findings

01 MAY 91

1. comp day (mon)

02 MAY 91

1. phone message from Barry
2. cert. mail offices: on Cert. Del. list
3. Dave mail
4. read Air SIA comments on FLWR; to Dave L.
5. memo from Dalton retired Lost Flower
6. Proposed watershed status rule to copying for GA
7. left message for Randy Cook
8. Randy Bourquin: we need to call Bob Ambrose to ask that CERM should not oppose to Ohio for report on Cuyahoga
9. Bob Ambrose: left message; could he please let us know, Tim Wick can schedule time in June; 20th or thereabouts
10. Lee Dillerton: talked to Cynthia, Dave M, Rick Bolla
11. Wayne Davis: already taken care of
12. left message for Dalton (retired) his call); want to get to ORSANCO policy plan
13. Charles Pope on biomonitoring in FRN; Dave K.
14. sign-off Mahoning Co. Mod. to Cook permit (no review)
15. talk to Bob Hunt while WR supply Segment 2 - Lucy Rector Mg and M; but Dave made WR rec
16. Brad Nolan (ARA): left message; deobligation received; signed all documents
17. Billy Berry (HQ): ~~[illegible]~~
18. Pat Wilcher (HQ): ~

16. Mark Mabry: talk last day that can be complete
- Chuck Ely: left message: 3rd mod. NOI response; 1st week July of year
- talked to Lance Nelson & Barry Bedroff: best if used quickly; but obligation should be lost; talk to project officer at HQ & contacts about obligations
17. computer files
18. trip report (Boise meeting)
19. Kevin Nelson (R10 399-1774): has 85 acres raised 30% or less for forestry testing; I said no, but would explain
20. Cynthia Wolf: talked to Jon about memos & WIP
- Jon talked to me: WIP Bruce made changes; draft memos in word; she pushing for memos to be out; I said my impression was that WIP comments liz changes needed
- told Cynthia that she should send memos to people must be put on record & be offered position, or to make sure WIP has officially; should not be satisfied unless record & WIP
- told Sue of conversation

Claudia pay no

03 MAY 91

1. Janet Lemmons (Research Ass't - 529-4081) (Chuck Ely)
- segue Sept. 30
July 20 (Jim) deobligation → Janet find $50 for Mary
- Mark Mabry:
- OPPA wants to do WIP at same time
- CH must be able to build trails
- last, really much used to go [illegible] Seattle & Eddy

2. Dave master, nota; absolute
3. Ash: Republic permit: Category 3 over through 2/2 acute tox (~2.2 T/a); general objection; talked to Jane
i. Category 2: 2/2 ppm acute; poor mixing for 30 yds in waterway since 1982; mean outfall no tox (MRC)
ii. 3-45 1-06 doesn't allow ≥ LC50 w/in RTM; also mortality - no toxics in toxic amounts
iii. Argument for not designating stream (based on [redacted] independent application) & addressing thermal impairment is weakest; does OPPA buy independent applications or not?
iv. Conference call (Jane, Ash, me; Suzy, Dr. Dudley, Paul Krahe; Gale Norton, etc.)
- will get back to us about category 2

08 MAY 91 WEEK 77

1. Chris Gardner introduction
2. Evan Mecham (Region IX Oceanographer) (Gauge Study) (Bonneville)
- must come to Seattle to do [illegible] (Betty & Sandra)
3. Mark Grangeli: team of labs at 2430 WEB; Guidance thirty [redacted] - guidelines are judgment, but useful
- 2 numbers carried in 1985; negotiate for 7 & duration of exceedance (not "never to be exceeded")
- WQ based limits have worked - rarely used. Indirect when compared; rarely no impact under new - compliance
4. Rick Swartz: Region X Water Div
- criteria = the water criteria for the [illegible] water
- new criteria being proposed [illegible] LC50 & duration
- 96 guidelines [illegible]

4. - sediment LC50 (interstitial water) greater than water LC50s
- covered data assumptions & uncertainties
5. Gary Ankley: TIE for sediments
6. Al Burton: Coupling TIE & ecological evaluation w/ in situ assays
7. Chris Ingersoll: freshwater invertebrate - AVS method
8. Ted Berry: Marine chronic polychaete, bivalve, amphipod
9. John Scott: Lab. for applications, population dynamics, I-4 in; effects of pesticides

1. Dominic DiToro: Acid Volatile Sulfide (AVS): defined, theory, FeS is the key to bioavailability of metals in sediments (other metal sulfides are less soluble & cannot react to liberate)
(equilibrium metals (cadmium, zinc))
2. Phil Allen: analytical methods for AVS, SEM, Cytochrome fingerprinting
3. Dave Hansen: AVS, predictive tool, estimate
4. John Malloy: Copper: correlation with toxicity, AVS
- as FeS molarity passes 1.0, metals become available
in pore water, causing toxicity (2nd yr. of data gaps)

(07 MAY 91)

1. Open discussion of standard H2O pairs: Carlton (Wayne Davis)
- log K values from lit. used in toxic assessments, but not in others
- K sp values (10^-5 & 10^-7) difficult to measure, diff. in overlap of ocean & the water phase therefore difficult
- must look at literature & use judgment to pick #
2. Dominic DiToro: sediment quality criteria guidelines
- want to be w/ 1 factor of 2
- use metals-only criteria as protective of the others
- calculate partitioning in water from sediment to determine concentrations for protection of the organisms from toxicity (or lack)
- AVS/SEM, etc.
- not clear whether organisms get chemicals from pore water or ingested carbon in equilibrium
3. Bob Hale: field verification studies
4. Dave Mount: Indian pond sediment criteria document
5. Tony DeFoe: potential quality criteria guidance
6. Wayne Davis: factors affecting bioavailability
7. James Brenner: sediment research - just. impacts
8. Measuring PAH (PAH) in San Diego Harbor sediments (Dazzo Young)
9. Robert Ozretich: biotic discrepancies in bioavailability
10. Louis Thibodeaux: volatilization
- most important has to do with mixing rates, but volatilization can also make things diff., and has not been studied
11. Eric Saylor (EPA): implementation
- problems w/ sediment criteria
- lack of understanding in developing criteria (more has arisen)
- cost of metals, based on geologically unusual criteria
- criteria will be used actively to cause pollutants remediation
12. Rhona Wahl: opinion: did not attend

(08 MAY 91)

1. opening for Dave Rubenstein: sediment criteria field trip; guidance
2. Dave Tuchman: NRCS (account of procedures of contam. sed.)
3. Nelson Thomas: sediment criteria w/ field trip
4. Elaine Dorward-King: exposure pathways
5. Cathy Williams: benthic organisms group perspective
- Saul Clark: criteria
6. Mark Lorenzo: boundary core data
7. Betsy Southerland: Agency strategy
- natural recovery w/ short comings in the program under mixed (G.I.)
- comparative risk type approach but we gotta have different reactions
for cleanup & how to implement & coordinate on the CERCLA

8. Vic Beerman: SRC tech. appeal [illegible] application
9. Tom O'Connor: [illegible] adjustment to it in conf. call
10. Chic Judge: sorry comment to [illegible] modification to [illegible] through AWS & Rockwell. [illegible] TOC to talk to agency - also TOC as for (protection) problems w/ water - not that water and wetland issues not representative

10 MAY 91

1. talk to Larry
- relocate workshop
- Mark Mahoney will be Cuy RAP coord.; Ohio SP will help w/ paperwork; EPA may need another 0.3 FTE
- Lee got job w/ Fairfield
- 110 meeting on Olmsted Falls
2. travel voucher for R. Stop to Ronald
3. buy mail
4. note to Connie re mailing $295 for 1 Jan 91 Rapid Bioassessment Manual
5. sign off Hamilton Co. Sycamore Creek (no review)
6. RAP meeting (1/2 hour late)
- Mike Pickelhe
- WT and Chris 9:00 not meeting
7. Cuyahoga FRN published 20 APR 91

WEEK 78

13 MAY 91

1. Tom Gnadinger (Cleveland Plain Dealer); Phillippa [illegible] (Public Affairs); Cleveland designated use (Cuyahoga)
- Thursday call
- left message for Tom
2. Read GL report [illegible]
3. read Coastal America
4. call Mark Mahoney about taking over RAP
5. Black River CWAR & fish load from Great L.
6. WQS Coord. filling
7. TA #s for Ohio, PA (cancelled) & Penn, Co to Utah Lagoon
8. talk to Larry about potential res. guidance (Sec. Chief; [illegible] specific (minute, WDS, TMDL, model WET) & Unit Chiefs (2); 3 State coordination (WQS, monitor) per unit
9. Mod. per request
10. Talk to Ag coordinator re to revise ORSANCO program plan; he will talk to Pa; ORSANCO complaining to Congress about Elephant Island 2 study, proposed

14 MAY 91

1. news from Joe Ide re testimony for Larry Lewis
2. Barry: use as talk about press release for Cuyahoga (Jan 4 Barry to)
3. Annie: P.I. travel voucher to finish
4. GLNCT
1. Mark Dutton: attach monitoring by Ag companies, flow Cuyahoga & newspaper; will result in Env. Chief pressure

ii. Edwin O'Neal: Constitutional right to do so
iii. Jane DeRose: employer to (Clean Coast + Dan's Seafood)
iv. Earle West: wants to talk about Cuyahoga aftermath
v. Dave Schuetz: BAT
- hardest / edible to lipid
- FM for high K ow may be suspect (based on Thomann pub)
pretty good alternate ~~[illegible]~~ values (diff between BCF + BAF) for high, but probably appropriate for BAF
- Del Rio study 988 carbon BCF for HCB & Cmix, will then apply those equations
- ~~[illegible]~~ Chuck Staples has data already
- DDE, 2 Mirex, DDD, Hg, PAH, Aroclors, Chlordane, Dieldrin, Toxaphene, Hg, PCBs, dioxin, toxaphene
- hazel will this be measured BAF?
- different legals in fish by fed + state - different R.A. criteria must consider focusing fish on 1 species + 1 location (n=10) (n=10) all non-Great Lakes samples use (n=5) (n=3) composited use 2 to 3 whole fish weighted use 6 weighted for all Lakes
- mid-Atlantic Region (reduced use more)
- enough info in criteria compared to local variation that may be good enough
- either overall mean of game fish or mean of salmonids
NY no opinion; NE salmonid; IN ~~[illegible]~~ Trout; MN all or salmonids
± all; 3 of all; MI Lakeshed, PA trout (FWS + NPS salmonids)
- will calculate both
- whole fish data base has been compiled: overall mean for basin
- Thomann model: Dubut not surprised by Thomann comments
unavailability is not surprising; less stringent data

(15 MAY 91)
i. Antidegradation
- EEQ should be trigger or action level, not final limit (SC)
- Cancer tox: Hg specifically included for intake (streams at 2/3 of 15 g/day - 13 BCF; should draw line at 50% 1/2/50 fish. Hg, maybe Se + Th only intake; should call it human nutrient not pesticide (reduce definition); not changed for now - only if SC says to
- DRINKS; addition of a few words; take out word "significant" socioeconomics (Del Rio's could not attest today); no way for State environmental agencies to do Basin assessment - just make some criteria; Region can do - right to SC; Com: Del Rio's report updated version (no one understood what she meant)
- EEQ: not final limit, point to (action level/trigger); no EEQ at all for non-pesticides (just point limits)
ii. BAF: selected 6.9%; alt 5.7%
iii. antidegradation
- option 2: EEQ - triggers; more information/factors; resources for evaluation not much (OH); Region provide assimilative capacity; action plan NPDES must be approved as part of variation - Region can do Tier 2 or trigger variation [Mark H.: don't want to go to Board + enforcement; probably can't]; permit limits do not reduce chance of injunctive relief by court
iv. human health
v. Bill dates: mail 5/24, Hg 6/30 (5/17), TSD draft 6/17; final 7/31
WL dates: mail 5/8 (5/17), Hg 7/31 (7/19), TSD 7/31
TWG: June 17-19, July 8-10, Aug 20 (next w/SC)
vi. antidegradation

16 MAY 91

1. to Thea Kerija in Lus: the 2 permits + explan memo to Harold (mark copy + save to Bonnie for distribution; Thea on Kerija Lus)
2. rec'd from Harold permit mod. (no issues)
3. call to Peggy Bean (5-7517) sent pay; submitted mod to Dept
4. call to Mark Maloy: not in
5. Attorney memo to Barry (draft); copy to Dave R.
6. Jane De Roo: MO conf call w/ OEPA on Bryd Mistake
7. Barry: for Jim Fry: how 6 State-level recruiters were (Lowenstein)? & what criteria for decision?
- told Dave R that BR will not report tomorrow on MT issues

17 MAY 91

1. Attorney memo w/ Dave R.: finalized & signed (to Barry)
2. talk to Barry about TWG
- we are being asked to report much more, but are not (in meeting this morning) in order, agreed to actively push down; and time will be much better spent elsewhere, affecting the GLWQI
- the TWG remains hugely unmanageable & Dottie holding all of the TWG notes; 15 TWG's & 15 WG's left
- proposal cover that there will be more training on specific issues; acknowledge all field data for high nonattainment for 6PPD procedure
- no rejected permits are here for mod or issue; people from RV all 2; hope to stay apart from different points of view
- TWG is hearing "polished, ready-to-hand" messages 2-3 attorneys present this substance about methods (cf. April 17)
- Barry thinks will get more of that w/ Doctor; can't be much about it. I agree
3. Barry: going to RVII next week about a petition permits pol.
4. Dear mail
5. read memo from Jane on Bryd's Mistake permit; Mobil conf. call MO at 10:00 or 12:30
6. file Approved Exp, & Steel Tube permit (no renewal)
7. Cynthia Roll: left message
8. Mark Maloy: not in
9. read NWF counterproposal for GLWQI implementation procedure (Roll, 15).
10. Lt. Collins: no additional pictures. Big flow & heat. [ ] on Cuyahoga: data not rec'd; 2 of 3 fc. 89s & 2 89s, 2 fc. 90s & 1 91; official copy will be sent (from Barbara West, NPS, 327-2813)

20 MAY 91

WEEK 79

1. read GLWQI prop. (Doctor pages)
2. read periodicals
3. Cynthia Roll: left change; only 1 more
4. OEPA Dave R. Bone from OEPA on Cuyahoga TRN; copies to file, Bryer, Bone, De Groff, Shepard
5. Phillips Conoco (Cities Service) station about De Bay River; gave Bob Rolen & Rob Fry name (to Rob)
6. 9:45 Dave R.: re: MI Rule 57 proposal, rejects
- would like NWF's position: (sought 1 1/2 hrs Tim)
Dave to call Dave R. to Barry and Bob about
- no reaction for OS NWF Board Exp; copy to Visit Lorain w/ new signatures (Barry & me)

Lucy Phillips, Park Pattison, Mike Cecil, Mike Pollard, Roger E.

8. Q&A for 12: Roger to schedule conf. call
- NEPA: let wait for input
- earthday: schedule set to begin date (agreed)
- Design plan
- Design 1 or 3 250:1 district; transitions in allowed in 3 districts + 3 districts - P; not resolved - parties will decide; Standards parties: should have limits. Cut will accept Option 2 Design; EPA wants Option 3 months)
- Coal Trunk rail would charge permit based on person plan; Pat Dudley said would work it in
9. E50/WD Rules
- PIT: deal by 7a 9 (1 Rep to by Sept 25)
- Chapter Teams: Chuck, Jason, Mike, Ken (Chicago)
- Sale Areas: May 31 - June 10 (1 week, 2 weeks)
- 5 year strategy
- Type 1 Mines Rules 316 demonstrate required in permit
- Eagle Rise (Rule 1): Judge injunction (PI 2/pivotal); adjust engineering will create time; inspection in mid-May (Larry, Dan, Jeff)
- NAGC (Ky) Court vacate (Ky: Lewis Wood; appeal Rule 1 decision from Clark); motion for temporary program (complete)
- Program Standard by June (Jeff, Eagle work on it)
- WD comments on Region 2 E50 regulations (Jeff)
- Jim activity report from Rob P Larry (Aug)
- MSHA meeting - want more support from WD
- EMA info sharing (Lucy to see if Dan Brown has (WD want to be no more than 2 days)

10. Talk w/ Larry Pollard re: Joint Michigan Rule 57
- Ok: permit 2 of 4 Standards Phase (can't exhaust of objects under NPDES)
- Public participation
- Stay - pending outcome in effect

21 May 91

1. read MCNR proposed revision to Rule 57 + comments; talk to Dave P.
- appear to allow Commission to authorize intent of 323(c)(2)(B) based on Acting Commissioner
- given advising committee and 1 person on team, making that in MCNR's responsibility
- subsection 323(c)(2)(B) by allowing as much flexibility that terms may not be sufficiently limited to protect WQ
- given multiple views of Standards w/ NPDES given
- given too much say to landowners; public notice should be all.
2. Talk Billy Craft (5 permit (no review)
3. meeting with Jeff Stutler (6:15 or 4:20 pm)
4. read Roger III comments on Rule (Jim Fox, Joan K)
5. meeting w/ Larry in-line: read Rule 57 (Jeff) + III permit approval; Activity Report distrib.; not from Ky + WV submittal (under Rule Larry)
6. read activity report + note
7. Call Malony: will send KAR (2 Ste from Larry; cc: Phillip Noel); Bills from Dale to
- find out in Corps want that Rule in Standard for Corps

S. K. Town: invest tomorrow at 10 about MZ

22 MAY 91

1. confidential info on Korea WRS meeting (13-14 MAY 91)
2. Feb 91 Malaria Risk Ch PK (Lessons Learned Today Day 5 WS)
3. Feb WRS Fiber 4 yo Korea - quarantine
4. Meeting on MZ Feb 5? Lessons (Dave D, Dave L, Jim H, Barry K, Dave)
- marked up draft LOR — Dave L sent draft to Paul Foggo
- also made sure that not covered under 3305(c)(2)(B)
- Dave: add MROSE lessons also (Stan); add 2 samples of how 3305(c)(2)(B) used
- FAX draft today to Foggo (about 6 pp 15"; some fig
5. talk to Jim (for Dave L) about about B. Br. b. Work
- PVIII Iraq case - Joan trying get pbio face of necessary (unnecessary) problem
- GLNDS 21st employees re Fed Code ill employees conditions
- HQ will (probably) not publish change to GLNDS
6. send info Baltics
7. draft MRM guidance to Joan K
8. Rapid Assessment Protocol presentation (notes Wayne Bond, Tom Sh

23 MAY 91

1. Kirk Peterson: Doctor 7 of Pediatrics Korea 24, R5 not doing anything; R+ found procedure, R9 + R10 use but will form procedure
2. Dr Bentley: Does will stop write reference call on Pg 1 article; Dr thinks use - interpretation Brucellosis implies Rule 7 (b)(5) page 6 Rule 4 or 6; also, not issuing directives to operate under AFI 24-301; Rule 7 says outside MTF; MZ determinations are optional - don't usually use
- (Rule 01 says do not use; state only to employ 2 yrs)
3. memo to Jane on Republic Medals; sent
4. memo from Dale to Rod + 9 Pediatrics re PRK transfer; to spell
5. sign off CSC Admin Tasks (no memo)
6. look at draft OSHA Occupational Language
7. Word Power Database
8. birthday, to

28 MAY 91

WEEK 80

1. sign off Blue Boat Lake permit (no memo)
2. HERL Database
3. MARCORPS Database
4. DNA info back from Joan
5. Barry: will do agenda as co GLNDS Regional Ctrl Com Conf Subcommittee topics for Portland; replace Lacey; send notes
6. Dale: streaming info
7. Frank Gosling
- will send w/ORAM about request for meet & for sampling (Flame)
- look for memo (PAP case Jenks)

29 MAY 91

1. MARCORPS database
2. Barry: trying to get doc. Glen info for Jim Long
3. Asked Joanne Jones to RII - memo typed
4. Mr. Dell Lago (315-455-0345) FRN 53:226 (23 Nov 88) proposed change to definition of Significant Non-Compliance under 40 CFR 403.8(f)(2)(vii); finding

- asked Larry, Tim H., Jim Pellegrini, Ken Lanza, Mark Gordon (HQ 475-8313); actually pretreatment

5. Larry: told Bill Melville to put my name on FW Tech WG, but can't make meeting tomorrow
- DL meeting tomorrow

6. Mark Peach (Summer Prog Lab 444-475-6700): need Rotenone for dinky H2O
- Henry Pawlowski (SWD) (586-0245): Pb action level for corrosion control; FRN this week; cites >5000 monitors Jan 92; July 92 for smaller

7. Dave Kimby (313) 663-3200: FW Aquatic Life Chronic LOELs for arsenic, lead, copper, chromium, iron; changes in '88 from '85 and (Gold) book?
- no changes for these parameters; only '86 gold book; '85 guidance for standards;
- copy of upgrade from Larry

8. Larry: what to do re Pb & thoughts about practicality of putting Standards Mgt in Permit Section (Dan Bauer)
- need autonomy to do job correctly (Standards program, monitoring as opposed to permit issues)
- make sense only if in strategy of using mixt for permit issues (WERL, WET, etc.)

9. move fabs

30 Nov 91
1. Bill Mallville: can't make today's meeting; put me on committee
2. read memo: Shepard → Waugh, Bill
3. copies of State standards to folks; organize / label fabs
4. MARFISH database

copy of National Toxics Rule to Dan

5. transfer HQ monthly activity reports to disk from Larry
6. phone list
7. Jane Bobo: Comm. Proj. 2:30 conf. call
- speak to Bayota people about standards process 3 Dec 91
8. Meeting on DL (Dave D.; Pete R., Pete H., Larry K., Rob B., maybe Pamela w/ 316(a) requirements (or generic; we need to decide our position on what we will require of permittees; 316(a) will exceed the Standards; have been working independently on at cross purposes (Pete R.)
- EPA planning Pete R. for one again (Pete R.); what about temporary (Rob)
- Specifics on Muddy (may need to let Pete H. help with it as originally specified by Chuck & Dan) (Pete R.))
- chlorination was not protected; should change upstream Standard (Pete H.)
- Not getting full info (Rob)
- Separate letter, limited info. suggests low use, not protected, exist use is upgrade to general use unless caveat use is given (Larry, me) (to Board)
- We should appeal before FBAR Board (Pete R.)
- Tom Hill / Scope of work letter plus Standards / Bonus. Letter (IAA)
- Reference guidance committee Hoots & Stiles to Pete (2nd Pete)
9. Dan Dudley FAXed something to me (mail room) - will send over today
10. Project 92 presentation
11. Larry: According to Barry, Jon is very upset w/ antidegradation memo; Pete says many appreciate it & more talking from EPA

31 MAY 91

1. distribute Cuyahoga RAP memo (transfer to Mark Mahoney)
2. done list
3. Meet w/Ric, Gene, Larry, Ash, me on Reynolds Metals
- Better line: objective based on State Regs (pass my amend) / Fed Regs (just is pollutant, ppm, mole limit)
- 1st case under new State WQS (Al 2.5) Aluminum was appealed Circuit Ct 9 May 1990)
- can get limit > 1.0 TU$_A$ only if AEM demonstrated; clearly can't have 25:1 dilution
4. LTV comments on Cuyahoga TRN
5. OEPA comments on Cuyahoga TRN
6. Jim Dalton: need Ohio Health department Hygiene advisory for Lake Erie
- Tracy Shelly will return my call (Ohio Dept of Health)
7. Ken Tipton: bioassay mtg w/Bob B. at 1:30; tell OEPA that we will not grant [illegible]
(Conf. call: Larry, Ash, me, George Elmaraghy, Mark Mann, Jay Manton, Andy Hayes, Dan Dudley, Paul Novak, Suzie Wickem, Cozzolo, etc.)
- 35M will not put 1.0 TU$_A$ in permit
- We will object
- OEPA will appeal
8. Check again w/Ric
9. Talk to Pete Rowe about conflicts w/Rob
10. Rob will send draft of letter for Reynolds Metals on Monday; I will write up meeting summary

03 JUN 91

WEEK 81

1. Rob graduate gifts
2. Mahoney note to file on Reynolds Metals
3. Disapproval of OEPA Standards (Biocriteria); should file for work
4. Receive LTV Steel comments on Cuyahoga
5. Received Daily Mastry testimony on CWA Reauthorization
6. Received Edgewater Parcel
7. Note to Pat about Cuyahoga file
8. Polly: 1 paragraph on OEPA mid-year review
- look at MN variance
-

04 JUN 91

1. Biocriteria disapproval: revise; sign off; support package to Dave Pfeifer for attachments; admin. record Rob
2. Have ready (Rick Baird)
3. Anchor Bibs meeting
- unit should put together available files for detail set by new RPS + Secretaries
4. Received NEORSD comments on Cuyahoga TRN
5. Received draft Stage I RAP (Cuyahoga)
6. sign off Phillips Electric permit (Conneaut)

05 JUN 91

1. Sign off Reynolds Metals print letter
2. talk to Rob about management + planning in Water Division
3. New address + phone number to FWS
4. Tracy Shelly: left message: (Hg) none, unless received in 1970's
5. Stan Martin: left message
6. Phillippa Carron: left message

7. Bob Bacon: OWRM copy
8. Ohio Standards mid-year to Janet C.
9. Tom Brockway: Cleveland Plain Dealer (Phillippa Cannon)
- Press release from OEPA
- I gave him full explanation: history & likely actions
10. Read Region V phosphorus policy - gave to Ronnie
11. Read letter from Larry to MN (Kimball) on site-specific
11. memo from Joan about 15 JUN Standards training
12. Notes to Bob on Ohio River TDS info from Don Lewis
13. Read Illinois WLA Agreement - comments from Rob Boyer

05 JUN 91
1. Ill. WLA Agreement - comments to Rob
2. Ohio Program Plans Division received (to Janet C.) (+ Larry)
3. Left message w/ UST-WS Division
4. Left message w/ Violet Scruggs
5. update Cuyahoga files
6. look through materials for 7 JUN 91 GLI, SC meeting
7. look through Ohio EPA documents (Inventories)
8. Joan: where is info on relative sources contributions? ; not in WQS Handbook discussions under Standards matter
- gave copy of HQ briefing notes on GLWQI from Butrus
9. Read through P2 info.
10. Look through KWS Ref. Lab. Newsletter
11. Look through DMRQA info. from Jim Lee
12. Look through RAP Phase II info - recycle
13. Look through recent Cuyahoga Riv. Use info from NPS (Barbara Wood)
14. Look through grants guidance for State Water programs
15. Look through PSI-2 info from Bob Vaughn to GLWQI TWG
16. give Ronnie registration form for 9-11 JUL 91 conf. on Stormwaters + RAPs
17. Talk To Barry, Joan, Gary about GLWQI SC meeting - should be there to listen

07 JUN 91
1. read briefing package (HQ on GLWQI): Butrus → Ronnie/Bonnemaison copy
2. GLWQI, SC
- Dale: meat-loving vegan up - can't read minds (?!?!?!?!)
- Paul Jagger: minutes - thoughts for post. toc. only
- Mark V.P.: minutes - emphasize greater that HQ will delay
- think Sue D. from D.C. (Paul Jagger)
A. Human Health (Jim Grant + Gary Wallbank)
- Methodology, but not TSD + Criteria for satisfaction by SC
- Jagger: additivity of carcinogens ~~effects~~ in ambient
criteria would mean 0 discharge for Lake Michigan
since PCBs over 10^{-5} already (should look at data - may later)
- Thomas: must justify only some Class "C" carcinogens
w/ Tribal criteria ~~effects~~ won't Tier 1 here
- Butrus: Tier 1/Tier 2 will not be approved by HQ (Debby);
also concern about dioxin criteria + additivity
- (Dale): take good note while Joan not here
- Might need to look at 10^{-6} (FDL); IA 10^{-6} w/ additivity;
MI - risks based must be considered in context
- (Joan back)
- HQ not confident about science behind treating carcinogens
as additive
- don't use additivity for ambient
- how many tier 1 + tier 2 (Darrel): 10 by June, 20 by
Sept tier 1 (Gary H.); potentially 140 (will have to re-
sponse - Butrus)

(unless we say how procedure works for getting tier 1?
Bergson) (Better - ask, but will probably have to)
(Site inclusion - Schegerdus + Thomas - must be PPSA)
Gene: may be possible to identify US data that will
be used for calculation)
- Overly: tier 2 concerns, but more also tier 1; will there be
consistency on tier 2 #'s; no incentive for regulators to challenge
tier 1 rather than; different between risk assessment of real
managers - should allow us more judgment flexibility (5
orders of magnitude); arsenic studies only not good enough;
should be able to dispose toxicity (lack of toxicity);
should wait to choose 2/day until know other BAT info;
find way to slow process down - even w/ regulatory challenge
(Permittee info: ∴ no limit or ∴ no authorization? - Duggan)
- Van Putten: Tier 2 is critical - how to use social that is
passed - agree or not; ② additivity - '88 HQR FRN
says additive; ambient + effluent; access on additivity -
must assume independent action = additivity; if no
additivity should go to 10^{-6} or 10^{-7}; trying to avoid
conclusion that ⑤ carcinogen will be allowed
Implementation (Gene DeRose Cannon)
- 1st 8 issues discussed by TWG ??? (this is not true)
- Don Schregardus: will not ratify

- out for ½ hour

- MZ: don't pending water conservation (Don S. Paul Z.)
- HQS is not interchangable system biologically based flow
will have to change antibacksliding (Dave)

X MZ moved to hear about MZ ≠ loading;
is = to amount criteria translation to
permit limits

- Overly: not enough time to review; not addressing real problems
(e.g. NPS); not sure of point other than ease up
- Van Putten: ① SC keeps saying back policies for TWG
② Implementation becoming more general (tough decisions)
- PS emphasis not good
- other specific points
- MZ: abandoned work product; (P2) has been no discussion
- AOX deletion: CWA doesn't just speak to WQ based
- EPA should publish final antibacksliding; quit trying
to get around requirements
- level of detection: should have uncertainty factor in permit;
be silent

C. Antidegradation
i. Lake Superior (Baker) (Duggan)
- definition of ONRW: based on critical list of pollutants;
- define critical areas w/i Lake Superior
- define what ONRW would mean in case of Lake Superior
ii. General (Rick Ball - Tim, Barry, Chuck, Baker)
- current language is guidance / TWG; regulatory language
will be done soon
- socio-economic; Started simple; decided to be
more accurate; now too complicated; even Duggan
ready to go with simple water body I
- Duggan: support BEQ trigger: if add language
about deliberate action must demonstrate; if
above allowable - large trigger level only; not
permit limit; want to further limit which are
persistent bioacc (BAF of 500-800)
- offset language concerns (Baker)

- de minimis is variable (based on remaining assim. cap.); growth rate will be driving fly this; not really WQ based should be based on total allocation, not remaining allocation
- Bubay: letter re this thing (w/ Suggars crowd); lte quit reloading

10 JUN 91

1. disapproval ltr (of OEPA Standards - inventory) corrected & WEEK PR
   back to signoff
2. Memo: Bedroff → Dave Ray. WQS Coord. position
   - signoff; corrections; signoff
3. Letter: Bryan → Diana; signoff; corrections; signoff
4. Letter: Dave → Schegadura; signoff
5. Letter: Dave → Vicory; signoff
6. talk to Jeff Eagle about general reserves
7. clean mail
8. read ground water minutes
9. file TMDL guidance
10. finish reading HQ ELWQI briefing notes
11. call Vicki Scroggins about 24 APR Cleveland trip & Dave trip
    - out. Cleveland trip has been processed
12. Call Michelle Sage & gave Stan Martin #
13. ELWQI Comments on MAR 91 Langbein (DeBoff memo) & May 91 disp. package to Rob for TMDL perspective
14. Call Dave: TSD: ① relied upon for permit conditions on other regulatory situations; yes when U.S. EPA is on lobby action

11 JUN 91

1. Theater Robinson: need Ohio acute & chronic #s for several pollutants for ELWQI (general calls) comparison of States (HQ); will FAX list; done
2. Diane Montgomery (804→98-8731) wanted to know effective date of Ohio Standards (especially narrative) (01 MAY 90)
3. Dave Mackenthun: no message yesterday
   - Joan K. was sent BAT methodology on MAY 24
4. Clean mail
5. pkup 4 issues of Env. Cont. & Tox.
6. Ken Raven: how is Ohio EPA different than other States for mixing?
   - R>10 for acute criteria
   - Why different? - OEPA wants for impacts
   - When approved? See yellow; Where were fins?
   - Could we now disapprove? How? Narrative?

12 JUN 91

1. Env. Cont. & Tox
2. Work on Standards presentation for tomorrow
3. corrections on WQS Coord. letter to Schegadura & Vicory; also to Biocriteria disapproval letter; to Jean for signoff (for Ken)
4. Richard Rose (312-630-8213) question about R in dummy R.O in OK; gave Cheryl Overstreet # (R6)
5. signed up for E-MAIL training
6. look at comments on IL Standards from Rob, Pete, Pete

13 JUN 91

1. Brainstorm memo Barry → Ken on WQS Coord. position
2. Notes for WQS training
3. Barry/Dave: MI Standards meeting w/ Ken at 9:00; lodged info

4. Brenda Sanders: left message; (thermal severe guidance; draft framework not approved by OMB; not available)
5. look thru info. for GLWQI TWG meeting
6. update Cuyahoga RAP Stage I
7. WQS training for permits
8. E-MAIL

17 JUN 91

WEEK 83

1. FAX from Kristen Robinson; # of priority pollutants w/ criteria in ME (0) and MN (50); look at National standards rule
- talk to Bob & Larry; call Kristen w/ info.
2. distribute letter Kris → D. Martin on WQS Coord. position; also Bob's
3. talk to Larry about Ohio
4. file Labay mail
5. Bill Worthen (RS): gave RS info on D.O. criteria per 13 JUN 91 memo (Moon → WQS coord.); talk to RS Stds Coord
- memo w/ info week or so to summarize
6. GLWQI TWG
A. Aquatic Life (Brenda Sanders)
B. Human Health

18 JUN 91

1. Gary Amendola (216-226-8840): left message
2. Paul Pan (8-382-2929): wrong #
3. Kristen Robinson: left message: re RV Stds w/ Standards exceptions for high flow pipes
- Peter Guerrero: FN used to for fac. edit list no longer
- Larry S.: more
4. called Terese Gentile - can't speak at RAP workshop
- left Tom Davenport

5. GLWQI, TWG fictitious
A. Universe of Pollutants
B. BAF
1. Chuck Stephan - calculating actual BAFs (w/ Centaur doc.)
- 2 week internal EPA review before given to TWG (starting) MO: 17th or 25th?
2. latest BAF methodology document
- formulas out of BAF: BCF conversion; log Kow 4 or so get negative #s; Thomann at lower values (trophic level 4)
- only 2 % lipid #s (6% & 9%; edible & whole)
- definition says BCF & BAF are measures; (M) should say measure or estimate or "indication" (M.V.P.)
- remove "typically" clause from definitions - don't express preference in definitions (M.V.P.) (Kris out (Chuck Stephan) add route of uptake to BAF & BCF definitions
- substitute "measured" for "reliable" (M.V.P.)
- strike "final" for "final BAF (Gary - Cuyo); ok
- if use operational definition in procedure - must be precisely consistent w/ procedure; or switch to conceptual definitions only (M.V.P., Chuck Stephan)
- discretionary "can" for estimates vs mandatory "is" for measured; both should be "is" & definitive made clear (M.V.P.); ok
- adopt TSD definitions (Nelson Thomas); ok, but delete last sentence of BCF definition; explanatory language under III.
- significant figures of BCF: BAF (Bob Cleary); 2 sig. digits in TSD (Jim Lazorchak); ok

MR. What if mass balance is not complete but near field studies & MR final analysis indicate no problems?

5.B.2. – Dalatt will do Appendix (A?)
- IV. Question mean of "BAF and/or BCF"; should express preference (Chuck Stephan); expressed in III but should be in IV P2

-BAFs may be < 1.0 (Chuck Stephan)

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6. Lunch: ① OH conf. call 8:30 am 20 JUN 91
② R2 MZ counterproposal discussion at lunch (Rick Balla, Joan, Jane, Larry, Tim, me)
③ discussion w/ Ken & Tim about OH activity today. – how much of a loss is it?
④ Continued discussion on Ind issues; resolve Dale (no delegate)

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7. GLWQI, TWG (cont'd)
B.2. – Dalatt against default lipid values
- Dalatt – question about site specific BAF, neutral vs. total lipid in data? (Chuck Stephan)
- all BAF in tier I? (Harry & Dale Already); Chuck Steph not if no QSAR log available; produce all in
- where should BAF cutoff be? should use follow scientific standard principals or deliberately targ "known" population parameters; use BAF of 1000 as cutoff (below, BAF ≈ BCF)

C. Implementation

19 JUN 91
1. GLWQI TWG
A. Implementation

actual monitoring data
99% (long term average) = WLA
monitoring → modelling

4 ≈ 3
5 ≈ 6
6-3=3
A+
4≈5 :.
4=5 :.
OUTSTANDING
Ø

B. Antidegradation

20 JUN 91
1. Ken back & mail
2. Jack copy of Upper Illinois data; talk to Jeff K.
3. file antideg. summary – call Patti; memo to confirm to date
4. file Rocky River CWQR from compliance (Rosa)
5. Conf. Call (Ken, Larry, Tim, Jane, me) (OEPA: Andy Tiernan, Tony Mentor, Dan Dudley, Bob Hartzman, Randy Bournique)
- Municipalities say economic disadvantage because of antidg. more stringent; go with GLWQI
- who complied: Lima, Troy, Archbold, (total of ~10); prob Columbus, NEORSD, etc. – appeals; not stayed by EBR
- locked in by antibacksliding/antidegradation
- 1st hearing will probably be TROY; Lima hardest compliance
- OEPA not surprised
- was any of this brought up in public review? some
- Meade & BP had raised issue (resolved)
- OH only State w/ EEQ limits; other States, at best, will go to GLWQI level
- trying to get $ from State Legislature; permit appeals; OEPA thinks merit in the GLWQI doesn't do it; more else doing it; antibackslidg will continue problem; non-implementable
- Hydrostore shows no problem :. antidg tier 2 not necessary
- OEPA wants to expand Ken's Manual procedures for EEC & economic; leave to Directors discretion until new case can be developed (at least 6 months)
- still trying to keep issues water

NO DISCUSSION OF WHETHER PROCEDURE IMPLEMENTED CORRECTLY.

- rely on WQS only; not procedures
- modeling in 6 months; Water Pollution Control Manual 3 years
- not really looking at adopting CLWQT; Ohio also asked us to go slow re CLWQT
- might still try to implement BEQ for "specialty toxics"
- how many permits in interim? 50/year
- reopener clause in permits possibly
- what will environmental groups say?
- Ohio folks like not trying to finish CLWQT now; should not look like waiting for CLWQT on this
- By geographic procedures - won't implement for some categories; not consistent with 131.12 or our previous approval
- just rollover permit limits for non-resource waters
- State-wide economic variance? probably can't (says Andy Turner)
- work something up over next 3 weeks, then public involvement
- conf. call after environmental groups meeting (call back)
- Copy of other State procedures to OH
- meeting 15-31 JUL sometime; week of 15th; WED
6. Collect State antideg. procedures; FAX to Glen Dudley
7. Read & route Criteria & Standards Newsletter & Activity Report
- ask Larry whether he should be included on routing
8. LeAnn Unger: TPL Specialty, Acad. permit w/ WET triggers, they want monitoring only; gave her Ohio stds & Beyond metals memo; talked about State & Federal requirements
9. Jim Lazy: left message (Rec. Use)
10. Gary Amendola: left message (return call)
11. note to Rob on TBT / metals
12. note to Larry on LeAnn memo on TPL Specialty alkalinity study
13. look through RL info. from Dave P. / RAP

21 JUN 91

1. call about 26-28 JUN 91 Workshop in Chicago (WQ-B Outside)
2. check for FA to Breckenridge, CO; gave to Joyce; called hotel
3. Read TSD (Introductory Chap. 1)
4. call Peter Garrett: left message (recognized; priorities) re: follow up to
5. call Mark Malone: left message (samples to CLP; RAP transfer) re: follow up to
6. call about USFWS position; should he calling about interviews - give another week or so
7. returned call to Lisa Lein (241-5755 x310); mail up opportunities to boats
8. Jim Lazy: left message (rec. uses info)
9. MARFISH database
10. Update folder & computer memorandum
11. Janet Marrow, Midwest Research Institute, 401 Harrison Oaks Blvd. Cary, N.C. 27513; wants Cr standards for RV Status

24 JUN 91 WEEK 84

1. read TSD (Chapter 2)
2. Janet Marrow: include Cr, Zn, Pb, Mo
3. Jim Lazy
- needs info. on how States determine rec. use. (OEPA has policy; IL has rule, WI has language in Standards; don't know about others)
- Jim will ask David Moon & Bill Knuth about Beaver Pk. exposure data
- talked about CLWQT extensively
4. file OH letters
5. pass on A. of Enb. Cont. Dot. (21, 91-101 (1991)) Kalmbach FEA

6. Yuba Dragon (R3 597-9911): metals total ~~waiver~~ waiver no dissolved
- antibacksliding - HQ guidance
- intake credits - allowed? (discouraged)
draft HQ document says 1:1 for permits

7. memo to R8 on D.O.

8. Unit Meeting
- Ronnie: here on WE; part time (½ time)
- Barry gone June 28, July 1-5
- 3rd Quarter Highlights July 15
- Reorganization: Monitoring & Standards; Bonnie talking to Bryson, not part with permits
- new people: Sonya Vega - ~~all selected~~ (1st or 15th of July); Stefani in July (19th & 20th)

25 JUN 91

1. TA for CO from Joyce; to signoff
2. memo to Bill Voorhees on D.O. criteria
3. memo to Janet Marlow on Cr, Zn, P, Mo criteria
4. memo to Barry on E-Mail
~~5. memo to Dale on Indoor air mgt~~
5. Peter Jarratt: talked about ARSENIC issues & getting more involved
6. Mary Beth Bray: info on Stormwater & RAP Workshops
7. Clean mail
8. note from Ken on OH Antidg: BAT - talk to Barry
9. update Cuyahoga RAP Phase I Report (draft)
10. read TSD (Chapter 3)
11. Jill Mintz: Howard Markel in MN - called about petitions WQS info in Chicago - Bob Bacon; already working w/ Tom Rachford

26 JUN 91

1. Clean mail
2. TMDL workshop

27 JUN 91

1. note to Ronnie on travel (Atlanta, Denver; Breckenridge)
2. Lulow: wants more input on J&J pH limit; look to Joyce; get documentation
3. read Adrian Copozza paper
4. copies of criteria guidance & draft RV sediment guidance
5. GW Meeting
- comments on draft EPA GW Strategy - don't distribute
- Location Revision 5-5482
- restructuring; negative reaction to proposal; maybe TQM process w/ Bay program people - no objection
- USGS proposals & funding
6. Paul Pan (382-2926): left message
7. OEAA Antidg. Conf. Call (Ken, Barry, Joyce, me; Andy Turner, Jeff Amaggi, Gary Martin, Dan Bullen, Bob Hall)
- meeting w/ environmental groups (yesterday): prefer that OEAA stay the course; fallback to suspension (temporary)
- OEPA internal discussion: quick fix - revise procedure not a good idea; also won't be able to put a stay the course; temporarily suspend procedure - see what comes of RLWG; don't know about variance - how to do; Director can legally suspend (need decision for Lena by tomorrow); nationally not much important going on (TSD Antidg. Report)
- would ↑ limits still trigger antidegradation: no (A.T.); Policy in OAC still would be there (GM) - OAW still protected, still would look at effects in biocriteria

HQ bottom line: relocate

- pub. notice in weekly newsw, and press release/press conf.
8. After all meeting: find out what HQ thinks about OEPA suspending; bottom line is antidg., must be triggered by antibacksliding; last solution that may fly, w/ OEPA is temporarily suspend - and use w/ original number now approved
9. Call to Kent Ballentine about OEPA antidg.
- can force them to specify how will implement; also EEQ should be used, will talk to Bill Desmond to see if support for EEQ
10. Dan Dudley: as long as antidg. applies to permit limits, you will be ok w/ RV/HQ monitoring, must be specific; (Standards Unit & HQ Staff think EEQ needed there)
- will FAX tomorrow morning - call in afternoon
11. Larry: I will pull pertinent documents (OEPA); Larry will call OEPA tomorrow; copies to Ken & Larry

01 JUL 91 — WED 9:00 Dale — WEEK 85

1. clear mail
2. note from Ken on Brookville (OH) disapproval - involves ORC & FRN
3. Larry on OH antidg.: Ken says we will not approve or disapprove
4. call from Leif Amraen on antidg.
5. More discussion on antidg. (OEPA) w/ Larry
- don't hammer OEPA on antidg unless clear that margins threatened (not our recommendation)
- discussion of memo (me to Ken); might want to wait until

02 JUL 91

1. clear desk
2. Jane & Larry on OEPA antidg.
- Jane will participate in briefing for Dale
- Dan Dudley will FAX info on 17 JUL 91 meeting in Ohio
- Lima permit settles on FRN: recalculated EEQ w/ outfalls
- Ohio proposal is standard change (signif. dig.) plus suspension of implementation w/ page substituted
- not clear where Ken or Dale stand on issue - probably won't force too aggressively, give Ohio & Jones position (e.g. MONR)
- also, OEPA may issue Reynolds Metals permit anyway
3. copy of Critical Programs Act to Dale
4. call to Dale Kasmer: left message (invertebrates disapproved)
5. Dan White: will send me letter requesting WQ criteria addenda
6. send U.S. EPA Ground Water Strategy (draft)
7. Dale Glasmon: send memo from Ken Berger to Michael Smith (Air, Water, Toxics & Ground Water Branch) to prepare that Reginald Pallesen involved w/ OEPA NPDES/OFC already
8. Recreation use info. for Jim Lucy
- Dan Dudley: will send Policy in mail
- Denis Clark: all primary contact
- Bob Mack: 302.202 (general use); 302.209 (bacteria standard); will send policy 378 in mail
- Duane Anderson: Jerry Blaha: case by case
- Duane Schmittgen: left message
- Brenda Sayles: case-by-case; case years ago; feasibility specific by-life
9. Bob Mack needs 3 copies of TSD

10. travel request for ME audubon / FK to Parish (→ Ramsey)
11. 3 TSDs to Ronda for mail to Bob Moore
12. memo Crane to Smith / to sign off; signed & sent
13. look at OEPA antidegr FAX from Dudley - copies

03 JUL 91

1. MARFISH database
2. Brief Dale Ohio EPA antideg. (Joan, Dale, Jack, Larry, me)
3. - can't allow OEPA to just suspend approval procedure
Amoco meeting (Dale, Kay, Joan, Dave, Bill H, Jack N, Howard Peckham, Bob Barger, me) (Pete Redmon)
- much WET; not general use standards, but MZ requirements need to demonstrate BAT
- TRE requirement only in 1st proposed permit
- dispute - need 1.0 TUa & TRE
- Amoco went to Governor's office → calls to Jim Ball
- Lima D: reproposed w/ TRE
- me sent letter: need limit; possibility of (Castrol) degrease
- data: 30 TUa; chain biocide matl'y
- stuck w/ 1.0 TUa (13 yrs) lumber on them for 220 if non-biocide, non-permit
4. Dan Dudley
- sent 2 FAXes; discussed Dale briefing
- Dan says much of pressure off due to Lima settlement but OWRC & Directors want policy settled; may be able to stay course; may be able to come up with revised policy
5. Antideg memo to Barry (draft to Larry)

04 JUL - 12 JUL 91 VACATION

WEEK 86

15 JUL 91

WEEK 87

1. clean mail
2. Mark Slater - question about potential remediation on Cuyahoga R.
3. Talk to Larry about Ohio issues
- Antideg not pressing now that Lima settled
- WET / Reynolds Metals is big issue now; will request hearing; OEPA won't cooperate; should write memo linking MZ requirements & standards approval w/ WET permits & independent application
- We may want to delay some of our actions (Cuyahoga; Brookside) to use as hammer for CLWRI cooperation
- 17th meeting cancelled
- Chris Thompson of Crane Business (216-522-1383) called about Cuyahoga. (make points that USEPA has allowed reopener delay, partially in order to permit too stringent standards; Bemis will hope to meet Lake Erie EWH standards regardless)
4. Phillip Cannon: ok to follow up
5. Chris Thompson: left message (out until Wednesday)
6. Francis Brandt (475-7320): left message
7. Pam Charleson: question about IN WRS - wanted copy - gave Denise Clarke #
8. revise OH Antideg. memo; get Larry's signature, send
9. Rick Allbright (399-8514): left message (returned call)
10. Duane Schutzky: left message (Jack Sullivan on the 17th)
11. memo to Jim Lucy re. use designations
- Jim Schmidt (608-267-7658) & Joe Ball (608-266-7390) don't know of any written policies

16 JUL 91

1. talk to Barry & Dave P. about SW management
2. find out about RV WET WQS for Rick Allright (RX 399-8514); call (not in); ~~get~~ OEPA WET standards; will call him when back in town
3. Check w/ Ronnie on status / Dayton tunnel (BRC)
4. Rec use info. to Ronnie to be sent to Jim Lucy
5. Call Jim Lucy; left message
6. clear mail
7. Read SW Activity Report & pass on
8. Read TSD (Chapter 4)
9. Jim Lucy: talk about leachate & independent applicator
10. OEPA Authority memo to Barry signed
11. Job Fair: meeting at RAs 17 JUL 91; Job Fair 19 JUL 91 w/ Marc T.

17 JUL 91

1. 3RD quarter highlights: OH, NAR, CHART; memo to Barry
2. Job Fair meeting (RAs Conf. Room)
   - Ann Arbor, Kansas City, Cincinnati, Duluth at the table
   - don't offer jobs; don't talk about personal things
   - send form in tomorrow
   - 11-7 on Friday (Jim down for 11-4)
   - Life Scientist = Biologist GS-408 (401)
3. clear mail
4. read CSD Activity Report & route
5. talk to Jane about OH TRC memo; WET
6. talk to Barry about Job Fair meeting

18 JUL 91

1. clear mail
2. talk to Marc Tuckson about Job Fair
3. Job description for job fair to Laura
4. read groundwater info
5. 13 / mark up log Ken to Ken
6. update SF-171
7. read periodicals
8. Ken Ranger: ~~trip~~ to have meeting on 8th or 9th of the on Ohio stuff
   - Rose Treasure: out for while; may not be back
   - Ken Westlake: left message: can cover if Rose not back
   - Roy Palmer: left message - can't make it; Deb Klassner may come
   - Jeff Fromm: available both days (8th 8:00 am) yes
   - Barry; (8th 8:00 am) yes
   - Jane: will be there
   - Jon: will probably be there
   - Ken Ranger: in at about 8:20
   - Janet Causey: will be there and/or SPO
   - Larry Shepard: out til next week
   - memo out

3-2000
KEN WESTLAKE

Jim St.?

19 JUL 91

1. Kirsten Rolenson: toxic pollutants MN acute & chronic will be FAXed; OH & IN 6.5 8/day?; MN option for all?
2. Talk to Jeff G. about Division, Reorganization, etc.
3. read periodicals
4. FAX from Kirsten Rolenson; note to Bob P.
5. memo on Ohio WET / Del. App. / WE MZ WQS (start)
6. Job Fair meeting

LU ARMSTEAD, SAMO-IS

- Scott Laramee (resume): MECRO/BIOCHEM; Production (no) management experience; permit section? 708-540-0817
- Amy Pelka (resume): MECRO; very good; Tucker (yes) interested
- Donna L. Dulcay: B.S. Envl., M.S. Comm.; experience in wtr etc.; pretty good (312) 938-2204 (no)
- Cynthia Scholl: B.S. only - marine experience: no (312) 477-9911
- Bruce Kellman, Laura Jo Murphy 514-593-5322
  - B.S. Syracuse: Resource Manager; 7 yrs of Forestry steno. experience w US FOREST (yes)
- Joseph Taylor 708-963-3258; 227-0598
  B.S.; 3 yrs Forestry w/ W.V.: good, (yes)
- Marla Gilhaney: B.S. Boston U. biology; USDA experience 3/86 (4 years); wants to stay w/ govt; strong harvesting background; (possible) 1st
- Eric Gladstone (R): Physics / Env. Engineering: referred to Tim Henry (no) 708-968-5073
- Janet Stubbe 708-968-5073 Landscape Architect/Nat. Res. B.S. 2 mos. Environmental Planner; 3 yrs Landscape Architect; some wetlands experience; (possible)
- [illegible] Planner 708-[illegible]: 3 years IL Nat. Hist. Survey as tech. research biologist; BS. Biol. Wat. Resources good experience; knows IL, knows RAPs (Green Bay)
- Joyce Plechash: B.S. Biology; teaching experience (no)
- Ruth Mehr: B.S. biology (312) 563-9415 (yes) 1 year good experience
- Mary Kowalski: a lot of experience (possibly) B.S. Biology; M.S. Wildlife professor (312) 563-0139

22 JUN 91 SICK

WEEK 88

23 JUN 91

1. leave slip to Lavaya in-loop
2. clear mail
3. check answering machine
4. MN info. from Bob P.; call Victor Polverari: left message
5. info. on Cuyahoga RAP
6. Throw Lavaya in-list for memo from ESD on Cuy RAP
   - to: 24 JUN 91 memo on Selma Masada (House)
     Biocriteria info.
     CWA reauth. info.
     address designation memo: 303(d)
7. memo on OEPA, Inventions, WRE, MZ
8. Dan Dudley
   - Antioch: nothing going to happen right away; thorough examination; DL WRT; Court of Appeals remanded case to lower court & Director; must look at antidegradation when grant permit to install new monkey wrench
   - Use designations; copies of comments on Cuyahoga to Dan Dudley; Rockford Run approval; look at list of streams as recently-but know if any big problems (several EWH → WWH)
   - DL WRE - Dan reading letter that playing ball; told Dan we were meeting in 2 weeks or close sour & RLWRE; not afterwards
9. Reg Pallaver: 6 & Dale can't make it 8 AUG! move to 13 AUG!
   - move to 24 AUG 91 1:30 pm: Reg Pallaver, Jeff Levin, Rich Tomaj, Barry Bedient, Jim Slattery, Joan K, Jane Rose, me,

MN WH, 585

10. Aug 9 Illinois River listing for Dale 9-11; FL letters
11. FAX MN info. to Dale Robinson
12. update Cuyahoga file & summary
13. ask: Ashland oil TOS-metal; TRE; 1.0 TN-
look at res if ok
14. Dale Robinson needs copy of MN approval letter (WH 585) (part)
15. memo on OH meeting w/ other memo; distribute
16. read GW info

24 JUL 91

1. Jim Lucy: draft policy on consistency in toxicity testing (WET) for permit
General Chiefs (1st draft): comments by August
- Lucy will send copy & comments
2. MARFISH database
3. Pete Wave: look at Betz letter, etc.
4. Ask: brought over OH permit stuff (WET)
5. Meeting on Ohio issues (Dr, Roy Palmer, Jeff Travis, Ken Westlake, Larry, Janet, Wilkins, Jane, me) Mark Mahoney
A. Cuyahoga
1. live out
2. OEPA use
3. our own use
→ comments in preamble; public hearing on actual proposal
discuss all 3 options in preamble
- propose to live out (?)
B. Independent Application
- combine w/ other proposed promulgation
- letter [illegible] describing flaw
Dale → Jeanne Fox (EPA will FAX)
C. Maumee/Toledo: can USEPA and/or OEPA stop ACE? - Dr needs data of L. Erie standards applicable

25 JUL 91

1. L. Erie standards data & notes on Ohio EPA draft letter on GLWQI to Dr
2. clear mail
3. Re: Antelope memo (OH): Dale upset - some things put in his mouth by memo; must be very careful w/ criticism on GLWQI because of lawsuit coming up
- Ken suggests that put GLWQI/Standards meeting notes through signoff of meeting attendees
4. work on SPECIES database
5. talk to Barry about antelope memo
6. Ask Janet & Wendy about ESD memo (Mahoney to RAP)
7. Ask: Whaley-Pitt. Steel: WET monitoring only even though WET including MTZ
- talk to Jane
8. Jeff Travis: Roy Palmer worried that we must promulgate reasonable use; how justify WWH?; I said: propose strike-out & take comments on other possibilities - at that time decide if WWH acceptable

26 JUL 91

1. SPECIES database: finish
2. names for interviews to Larry
3. RAP stuff to Nelson
4. copy SPECIES to disk

WEEK 89 29 JUL 91 WEEK 89

1. copy SPECIES to disk
2. file 30-31 AUG: check w/ Janet & Barry about thoughts on having Mike look through
3. 1:30: sit in interview w/ Larry; missed
4. Kirsten Rolvaag: no change to 10 APR 91 diskette report
5. clear mail
6. read periodicals
7. AQUATPL review
8. look for 303(d) regs for Jim D.; will be proposed in August; take her copy - don't know rules
9. Cuyahoga names & #s to Margaret for 8
10. memo to Greg Steele - transfer of RAP
11. Chicago airport site: WAS compatibility issue coming up
12. read GW info.
13. call from WDNR about TSD training in OCT; will call back if doesn't get info.
14. Call Rita Bair about GW; not in

30 JUL 91

1. AQUATPL review
2. Rita Blair: not there
3. TSD
4. Ed Hammer interview; Water Resources - focus on Fisheries; 1 hour short of Biology major (has minor in Forestry); worked on Green Bay RAP; 2 summers in Bay collecting fish; Barry has work 4 months; Janet - Huron or Lake Michigan 3 years; budget cuts

31 JUL 91

1. Interviews w/ Amy Calder: Thesis done end of Sept: Available by 20 SEP 91; gave name of supervisor - leaves KRI (or resume)
2. AQUATPL review
3. TSD
4. Jill Mentzer: Indian question; Claudia out; transfer to Dave P.
5. Interview: Bob Wyblowski: Ecology & Environment site here; graduated Agriculture
6. Joe Taylor interview

01 AUG 91

1. Violet Scheggine: I received notice of $121.00 payroll deduction from pay period 23 or 24 for DCN PB 0061 (Kramer)
   - remember case
   - Bernice Hollister (6-9077) will look into travel advance check & call me
   - Betty Lofton responsible for payroll deduction; in tomorrow; won't go forward until Bernie looks into it
2. AQUATPL review
3. Bernice Hollister: Veronica Heath signed for $100
4. memo to Laura Sedlock

05 AUG 91

WEEK 9

1. AQUATOX review
2. Michael Dolan (consultant in WI) (608-251-4843)
   - check Zn acute equation (FEO): $e^{(0.83 \ln H + 1.95)}$?
   - Fe criteria in wetland w/ natural Fe ? site-specific guidelines according to 85 guidelines
3. OH permit from Dave P.: confirm no problems
4. called Emil (216-827-2883); OEPA
5. Mark Maloney: gave Engle name; talked about Cuyahoga sampling & possible $
6. Section Meeting
   - introductions & explanations of programs
7. GLWQI; left at 1:30
8. talk to Larry about not going to GLWQI meeting
9. talk to Larry & Janet about OEPA grant issues
   (Ava Kottas report about contact w/o her)
10. talk to Bob Wyndi: no problem w/ Ava Kottas
    - sent info to Maynard
    - update on activities on Cuyahoga by OEPA
11. called DW (Dayton) & gave Barry Bonnie's name re: DW standards
12. called Bill Bunge: EPA contract ($250) to track site-specific work on metals; wants effect ratio: Flint River MI, & Grand R. MN

06 AUG 91

1. read & sign IL Standards letter; to Barry
2. memo to Barry on GLWQI
   - showed draft to Barry & Larry; he not to go, memo not necessary (not sent) (draft to Bill)
3. call Bonnie Goodnerber (WDNR 608-266-3484)
   - wants info on how FL & CA developed WQ Criteria for P
   - also any info in RV
   - has 88 compilation by USEPA of State P standards
   - needs by end of August
4. look at activity Reports & 3rd Q. highlights
5. Standards info to Sonya; also TSD; quick review
6. Ronnie: throw out all recyclable parts of OEPA fuke in hall, outside of cafeteria - for full reduction in new building
7. read IEPA letters from Rob & Larry - talk to both
8. talk to Larry about exit interview; I will attend 1½ days, Jeff Taylor;
9. revise IL WQS letter; to Barry
10. AQUATOX review
11. call Ruttkay-Nedecky-Ruttkay Associates: had appointment for yesterday at 8:30; can have them rated by Th (out tomorrow)
12. call Amy Pelka, Ed Hammer, Joe Taylor: rating by FRI
13. call Joe Taylor about possible difficulty in rating
14. call Amy Pelka: sent transcripts & letter that requirements met to Ruttkay
15. meet w/ Ruttkay Associates
    - Ed Hammer qualifies
    - Amy Pelka qualifies once degree confirmed
    - Joe Taylor: may be problem unless EPS - looking into it
    - need SF-52 to go to Ruttkay
16. Janet Carney: email help re: w/ SF-52 & tomorrow
    - also mention to Barry

17. Wayne Davis: needs AI criteria: done
18. Ken signed FL WRS letter; comment on FL comment pages
19. dump CWAR files
20. look at MONR ZEO; direction for Sonja
21. through Sandy in - hot
22. CSD actuality Report due 10 AUG

07 AUG 91

1. OEAA Rupert Ken WRS approval; update & to signoff
2. SF-52s etc. for Amy Palka & Ed Hammer; to Barry
3. through Sandy office for documents, incl. OEAA use doc. info (found in my files)
4. call Barry about these; talk to Barry
- also told Barry about FL WRS approval signoff
5. Pete Rowe: briefing on IFAA for Dale
6. also promulgation letter drafts & to signoff
7. FL letter remains for Dale (typos)
8. AQUATR session
9. Meeting: Mark Valentik / Water Division managers (act for Barry)

08 AUG 91

1. clear desk & mail
2. John Aragonst: computer upgrade: 4M memory; 287 chip; color monitor; WINDOWS; Lisa Childs can get me MODEM; faster hard drive not available
3. session Mt WRS; Martin Marietta permit & documentation; applied CWA 404
4. FAX from David Moon on Toxics Rule: potential delay - call: left message; not 1 copy to Ken Kay Sanga to do for Ken but basis

5. Ken Stromberg: OCLWRT: LOAEL/NOAEL and TEF concerns by Steve Bradbury & Ken; WONR wants to go forward for public comment 65-7 FR 11
2 positions potentially available in Green Bay: 91-31 (31) through MN; CMLH-1-Ø49SO through OPM, Detroit Area Office, 477 Michigan Avenue, Room 565, Detroit, MI 48226-2574; Sandy Kemper in MN (Damage Assessment Biologist; Open August R)
- left message w/ Sandy Kemper
6. David Moon: changes are being made now
7. Dave Sabock: not there; left message for Pat Ballantine
8. Ken; gave info to Barry; wait until we see something in writing; may be unimportant wordsmithing; affects only 1 RV State; RVIII has done this before w/o getting over RA signature
9. Pat Ballantine: changes to Walcutt by WE, sign Friday; we want see until FRN; structure changes & moves to Appendix to avoid 90-day clock; another proposal after that w/ final determination; OGC wants to avoid going final; will have to go back to OMB

09 AUG 91

1. memo on Martin Marietta (Barry to Jon); to signoff
2. Wayne Davis: meet at 9:00 or WE on Sonja Salinas draft guidance on nonstatutory legislatives
3. read FL letters again before briefing for Dale

- over -

Dale Benson (Wisconsin), Jeff Zeeb, Pete Rowe, Wayne Davis (Illinois), Dave Gilkowski, Howard Dearborn,

4. Briefing for Dale
- standards issues: NH4 criteria
  2° Contact criteria
  UAA for 2° Contact waters
  Variances
  Wetlands criteria
  Narrative biocriteria
  Seasonal disinfection policy
  Antidegradation

two delay until FY 93

- Others:
  ① Standards letter in signoff to Dale's office
  ② Scope of Work on Upper Illinois already sent
  ③ TMDL agreement letter: to signoff next week
  - original Standards Scope of Work status
  - 4 letters project bad not sent

② Pete Rowe: status of projects & budgeted data, etc.
- Ammonia in sediments: ammonia in summer, to cold in winter; seasonal impacts on fish
- improvements are evident (Redhorse & native species back in)
- dispersants & biocides: surfactants that act as bacteriacides & general molluscicides; not well regulated currently
- MSD doing very good job of monitoring
- NH4 standard 0.04 mg/l unionized; exceptions to 1.5 mg/l below 1.5 mg/l (original standard); 2° contact 0.1 ionized
- MSD primary NH4 discharges (~30K#/day of ~55K#/day)
- IL WQS often reflect treatment technology not WQ
- MSD data summaries w/o any analysis or conclusions; no comparison w/ historical data; partly because it's a permit requirement; Pete thought problems w/ WQS data

- MSD is permitted to discharge above standard even though they do not; do not want to be required to meet standard, even though they generally do after operations
- Possible protection for problem; very high levels of NH4 in summer (expected low); lowest number when expect higher; would be compliance issue only if permit limit tightened. (to Standard on letter)
- Previously above standard but below permit limit; currently marginally in compliance w/ standard & far below permit limit; standard may not be protective; TMDL may (will?) need limit below standard (Standards letter gatekeeper)
② I presented status of letters & critical Standards issues
③ Howard Dearborn: Order will be closed out next year after inspection
④ Pete Rowe: temperatures
- multiple full river pass through, missing whole river temperature; multiple plants (6 stations)
- permit requirement to study effects
- Illinois Clale also
- Commonwealth Edison wants 5 years; should probably only give 2-3 years; must look at interactive
- ComEd doesn't want to use 316 (a); but it's perfectly suited for this (burden of proof on ComEd).
- IL temp standards based on Green Book (1968-9); need to be updated
- former 316(a) said no problem that not already there; that is no longer true
- most temp. standard for 2° contact is 100°F - probably highest in U.S.; not at all protective

5. Pete Rahn: Illinois Route 1 Workshop activities [illegible] remarkable water wetlands in Upper Miss. between ACE, USFWS, WDNR
- Pete wants conclusion at end of reasonably moderate
- Dave Rankin: fold in Hydrology changes [illegible]
Dale says yes (possibly Survey Dec. delay) (possibly Good also) (Actively)
6. Dale
- interest w/ FERC on our conclusions, stay for completion
- then hang in MSD & ComEd
5. talk to Ken about meeting + letter: limited accord to comments
Dale needs to go out; not new issues
Talk to Pete Rahn & Jeff Gaylor about meeting
7. Nancy Powell: wants to go over memo I called about
8. ~~Call~~ letter to OPM on WL Dam assessment position
9. Call Cynthia Nolt about Mr. Stromberg's concerns on FLWL:
10. Call Ray + Ray about Pistandard in CA & FL for Bonnie Goodwiler
- Fritz Wagner: FL Pstandard has been there for while - rarely used for effluent; call Tom Lenhart, Mary Gaylor, Eric Livingston (904 488-0505)
- Phil Woods: has already talked to Bonnie Goodwiler, 1975 no discharge policy because of natural average basis
- Bonnie Goodwiler: left message; sent note
11. Call from someone doing OSHA Emergency Response 311 (a)(2)(a); 307(a) - needs list of these
12. call from George: about a job
13. Told Ronnie to give me weekly activity reports every week which I will use to write CSO Activity Report
14. Mike Doan: left message (Fri.)

DAN SATTERFIELD O.H.H.C.A. 2777 Finley Rd. Downers Grove, IL 60515

15. Patti Morris: left message (Activity Report)
16. Tom Block (WD 6-2407): left message (Drinking Water Health Advisory)
17. Bob April: not there; Amy Gallows: not there; Lynn Papa: left message (Ambient WQ Criteria Document Addendum ECAO-CIN-__)
- may not want to send - not finalized / not updated; can check w/ Walter Dawson or Lou Blume
18. Joe Taylor: just checking in

12 AUG 91 WEEK 91

1. ARCATA review
2. Lenny: talked about Natural Potica Rule
3. Patti Morris: activity reports starting next month; first listing ten newsletters next month
4. Elmer Rolenson: need status of dioxin criteria approvals done
5. memo on activity reports; notes to Dale & Ron - start next month
6. Mrs Manetta memo final
7. Note from Dale on OEPA W/E-MZ/WET/Inv. Apr. memo (previous)
8. Activity Report to Ronnie
9. sent info (304(l) & 307(a)) to Dan Satterfield, OHHCA, 2777 Finley Rd, Downers Grove, IL 60515
10. Bonnie Goodwiler: went over info; people to contact for P. having trouble finding - tabulated P criteria w/ basis
11. Read TSD (Chapters 5, 6)
12. Talk to Jeff Gaylor & Chris Yoder about GL biocriteria - lower reach & Rapid Creek (303(d))
- left message: 5800 K; sent letter to EPA Region 10 March
13. 1:15 pm: Larry gave me Rapid Creek Basin Control w/ ESOs attached; originally James; Larry gave to Rob 02 AUG 91; Dave 08 AUG 91; PMO report (Judy Kirman 3-3387)
- call ORC about their review; look through; get something to Rob by tomorrow

14. Called ORC front desk: could not even get name of reviewer
15 Lula: will call (done) Judy Kleiman / ORC -
- comments to Lula by COB tomorrow
- Dale wants memo (Lula) to Branch Chiefs about this lack of problem
16. Review Red Border Review (303(d))
- Jeff Zeigler: option to use 305(b) for 303(d) - 305(b) does not require approval / secretary / public
17. Also received (304(l)) Red Border Review today
18. Lula: ORC thought had until end of this week (according to Jane Doe); had been working w/ Jane
- Art Smith (ORC 886-0837 will bring comments tomorrow
19. Judy Kleiman: have until 3:00 pm 14 AUG 91 (can be later)
20. Summary of Documents Received today (+ tomorrow?)
WD Control #130 (due 08 AUG 91)
Surface Water Toxics Control Program + WQ Planning & Management Program (FRL-3979-8) (40 CFR 123 + 130) (FINAL RULE) (303(d))
ESD Comments (08 AUG 91) (Control 475)
ORC Comments tomorrow
WD comments to AMD 14 AUG 91 3:00
21. Board Room: chalking about any RV response on nutrient Toxics Rule

WD Control #131 (due 08 AUG 91)
NPDES; Surface Water Toxics Control Program (FRL-3979-7) (40 CFR 123) (PROPOSED RULE) (304(l))
#474 ESD Comments (08 AUG 91) (Control 474)
#475 ORC Comments tomorrow
WD comments to AMD 14 AUG 91 3:00

13 AUG 91

1. Wenford Ross letter signed P sent (Ronnie); yellow, etc. to Dave K
2. Red Border Review (final and proposal; 303(d), 304(l), 314(a)
3. Dave Kirkpatrick: question about NY: digestion stay limit, Fed. yes; NY don't know
4. Talked to Don Roberts about Red Border - he [illegible] if it requires 305(b) reporting or less; gave him title of Red Border
5. write Red Border Review memo Bryson to Spitzer
- list of ORC comments in yet
6. Talk to Lacey, Mark, Amy Kelly about job
7. Jim Lacy: any chance of sending something to HQ on Natl. Toxic Rule?
- Ron said no; he's out for week; Jim said he might stop Dale
- heard he thought R8's position was sound; but Branch position is that we need info or paper to assess meaning of any changes
- Martha Prothrow-Stith comments already reached her; HQ; will not change. (according to Lacy)
- told Battey
8. ORC comments received 3:15 pm; package (303(d)/final) to Lula/Norma at 3:30 pm
9. Jeff Zeigler: Cuyahoga contact $ to help us w/ promulgation
- letter to FLNRO for L. Erie biocriteria
10. ~~Want carried~~ Control #130 (303(d)) / final to Judy K. (14 AUG 91 7:30) : no, gave to Lula who said would call end of day 13 Aug

14 AUG 91

1. Red Border Review memo (304(l)/proposed); signed copy hand delivered to Judy Kleiman at 10:45 am
2. Wayne Davis: if State already implementing narrative criteria for use attainment, may not want to force language change save for numeric battle
3. Battey: Dale wants Regional TMDL info (how many in 5 years, how done); also R2 - how do they do it
- ask Lee L. substitute going on
- ask Rob

4. Cynthia Rolt: [redacted] will be in tomorrow
5. memo to [redacted] manager on Red Border requests
6. Judy Kleiman - coal ash; got Wayne's initials on both STW comment letter; not going to use Key/Dade comm form; ORC comment only w/ proposed rule
7. Time draft comments on Master Marietta; note to Barry; talked to Lorna
8. Mike Flora agency: is only a grant award for OEPA ok?
- Standards deficient - don't know if it does/should affect grant award; didn't last year
- Jo will talk to Janet
9. talked to Jeff Gayle about Dravosburg problems
10. looked at 14 AUG 91 P&S Section layout / waiting for new lobby

15 AUG 91

1. cleared desk + mail
2. looked at info on TRC ZID (IL) from Pete Ghione for today's conf call (10:00 am); call Bill Polnaszek about conflict w/ BW permit - note to Pete H. on PLWRT submittal date (w/ implications)
3. note to Jeff Gayle on issue for $25K HQ Standard
4. Master Marietta permit + letter to Barry. w/ note
5. Cynthia Rolt: Steve Bradbury + Cynthia Rolt coordinate comments before last TWG meeting - concerns remain; negotiations will likely screen
- He mentioned (to me) problems w/ NOAEL-LOAEL conversion + TEFs for PCBs
- Cynthia says State's concern is more w/ LC_{50}-NOAEL conversion
6. Glen Stromberg: LOAELs + NOAELs not as good but cleared to live with because no response on it [illegible]

risk assumptions; should use dose response + something like EC_{10}; LOAELs + NOAELs are unnecessarily protective.
- [redacted] in practice: [redacted] need data for criteria; if only have NOAEL or LOAEL - use it; but if have dose-response should use something like NOAEL or LOAEL
- WP model good; what data should go in is question
- acute to chronic conversions?: not good science; must use BPJ; can use LD_{50} if have [redacted] a surrogate w/ chronic data
- TEFs: should get public comment; but don't think it's appropriate at this time; should put it out there; Kubiak's data not that good; Stromberg's mammal data has some conflicting results; Peterson has reservations
- talked about Cormorant study results; reduced hatching in [redacted] cormorants, but not embryo effects [redacted]; more chemicals in N. Lake Mi. than Canada; cross-bills prevalent in Green Bay; now looking for differences w/ affected side (affected / not affected)
- cross-bill + not, no difference in hepatoma response; very complex situation
- going to do egg injection; 1% cross-bill only; not as important as embryo mortality
7. IL Conf. Call on Vandalia permit + TRC ZID
- no dye study (what are ZID max. requirements?)
- measuring TRC, not Cl, ammonia, etc.
- 0.05 measured end-of-pipe requirement; but based on monitoring point before outfall; pipe sewer, no backmixing (0.15 / 0.30 mg/l at monitoring point)

- over -

15. Read Natl. Audubon Society Congressional testimony on CWA reauthorization

19 AUG 91 — WEEK 92

1. Activity report to Ronnie
2. Talk to Rob + Larry about last week's activities
3. Rd Border Beware package to Ronnie for copies
4. Karen Martin (Public Affairs): returned call, left message
5. Lynn: I must go to Indian Workshop in WI
6. Bob Vaughn + Rick Balla: where to send Point Source Impact Zone data?: will send to Joan Kamrowski & Barry DeZeeuw
7. Steve Bradbury: ① actual formula (major one); also LD_{50} for tier 2; and PCB TEFs ② valid PCB TEFs standard must be cited ③ preamble will highlight TEFs for gallic comment - LD_{50}: preamble will highlight; EPA may not concur - ④ preamble: put in other formula + different criteria; not charge charge for # - but set them for different reasons; SSF only an interspecies extrapolation; model assumes no difference in body weight or eat/drink weight - also may try to change out some the criteria that the 4 OPP [illegible] to get the results; mainly new data for the 4 criteria - Office of Water has only recently picked up on the importance (to them) of the FLWRT
8. Steve Bradbury: GLWRT WH concerns: left message
9. Message from Bill Wuerthele: called back: left message
10. Carlson workshop info from Gil Mortimer; copies to Barry, Larry, Dave P., Ken, Walt Lord
11. Barry: can't get to TMDL info for Dale; will see if Natl. Toxics Rule.
12. Bill Wuerthele: R1, R5, R10 reluctant to go forward on letter over Natl. Tox. Rule; other 7 are doing something (via R5). Waldrett did not get package; may have another week
13. Jim Lazar will FAX R4 + R8 memos; needs slides (via
14. memo to Barry on Natl. Tox Rule; manager cc'd; walk to talk to Barry before 2:30; Lunch for Barry; [illegible]
8. Jane: copy of request for public hearing on Reynolds metals

20 AUG 91

1. expand on weekly activity report; copies to Ronnie & Joyce
2. performance evaluations w/ Larry
   - will do this & narrative today - probably will be outstanding
   - reconsider: copy only for, not Dale; ~~Ken~~ agree Dale is an asset at me as ~~Ken~~ Larry; I agree I would consider copying some outputs of section on anything
3. call Jim Lacy: left message (Natl. Voice Rule)
   (Dale has an conversation record, wants to talk to other Division Directors); send slides today (to Ronnie)
4. GLWOI WL memo
5. meet with ~~ZID~~ analysis & considerations w/ Gloria on a WE permit
6. HQ CPS Activity Report; read & distribute
7. Clear mail (partial)
8. ~~Chris~~ Kirsten Robinson: ME question: left message
9. look at TSD applies: D-1-1: CWA replaces requiring NPDES WET limits based on narrative and as stringent as CWA; see doc B-3-4
10. Barry
    - signed Marty Marietta letter - did not want to hold permit hostage
    - want to meeting between Sections in a couple of weeks (told Jim); we should put position paper together
    - he to cc up to Barry only; he will pass info to Ken & Dale
11. Larry & Claudia: I will be doing Indian statute consultation; go to Dept. Workshop; give 12 presentations

21 AUG 91

1. finish GLWOI WL memo; draft clear w/ Barry; finding & distribute
2. Barry made TMDL briefing for Dale today (Rob PC)
3. 304(l) files; keep on to Joyce Dolan
4. R2 TMDL/MZ counter-proposal to Barry (memo)
5. Kirsten Robinson: ME diskette contains for Tuesday report; will change to not approved / no criteria
6. Barry: Dale wants letter R5 → HQ on National Voice Rule for Tuesday signature; to Jim Lacy
   - meet w/ Barry @ 1:00 (+ Rob & Larry) on TMDL
7. memo to Larry on R2 TMDL/MZ; to Rob; draft copies to Rob Larry, Barry
8. meet w/ Barry, Larry, Rob on R2/TMDL/MZ ~~Dale~~ briefing; Sue Gilbertson
   - HQ working on MZ/TMDL compromise; want our input on the R2 proposal & where we should go
   - preamble will need to include alternatives rejected; Dave & Rabicoff say will need big effort on preamble; Joan disagrees
   (Sue out)
   - mark up counterproposal w/ Rob & Larry; FAX to Dale
   - memo written by Barry to Dale w/ mark-up & Apr 3, 1991 Implementation / MZ memo
9. HQ called about travel info / TA info for Indian workshop
10. ~~Chris~~ talk to Dave P. about everything going on since he was gone

- over -

22 AUG 91

1. Jordan workshop travel info to Ronnie
2. Jordan files from Dave P.
3. clear desk + mail
4. Bob Moser: ESD & MZ policy (draft) coming from IL; also info on TRC ideas
   - talked about TSD; inconsistency between MZ guide & default mixing; CLARET, USEPA arguments, etc.
5. Unit meeting (w/Barry)
   - posting in next couple of weeks; Mark Tuckman acting for 90 days
   - 2 new people coming in (plus Sonia)
6. signed TR4 travel advance pickup for Ronnie ($100.00)
7. drafted memo Adamus → Valuch on Gulf Stream Rule
8. Jill Minter: left message; returned call
9. Tracy Layfield (E.A. Engineering) (301-584-7000)
   - Env. Criteria doesn't; typical contract for other
   - need 1-2 people per state; plus Regional for peer review
   - talk to Wayne Davis + Regional Biologist
   - by end of August; doesn't for Delaware
   - send to E.A. Engineering
     11019 McCormick Rd
     Hunt Valley, Maryland 20131
   - 2 per State plus 3-4 from Region
10. Wayne Davis: ~~letter~~ 20th memo
11. Talk to Tom Bromaden about Sonia, Ohio
12. Jill Minter
    - TA info (done)

- CLARA: no presentation; but I can field questions
- use designations: WL examples
- 4 people from HQ can cover agenda; Al (Dave Saluck, Bill Merton, Bob Schipper from Standards & Amy Ballman from Criteria); I can present how standards are used
- 1, 5 hour scheduled but can be longer or shorter
- will send Dave Saluck's info as starting point

23 AUG 91

1. format changes on Nat. For. Rule memo; back to Norma
2. sign off Pete Howie's Bonnie ~~Letter~~ Memo to HQ
3. Talk to Pete Howie about Yahoo Mussels, Nat. Forest, Upper Illinois, etc.
4. read in - keep; file
5. talked to Barry about ~~an~~ interview w/Dale
   - Dale wants to talk to me sometime soon
6. TSD & 40 CFR 100-150 to Mark Tuckman; WA Handbook to Ronnie for copies (to Mara)
7. Sent CLARA files; pull out Standards Unit work
   - read Barry's final memo to Dale (TMDL)
   - read Pfeifer's memo
8. Talk to Dave Pfeifer about Ohio permit (NPDES, etc.)
9. Revise phone # list
10. ADMIN/PL review
11. Dale: "Florida EPA" published details of Natural Forests Rule situation - beat on Valuch; Val doesn't want to send more; will talk to Valuch instead

— over —

26 AUG 91 : sick

WEEK 93

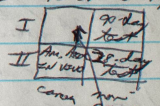
27 AUG 91

1. weekly activity report to Ronnie
2. base slip to Marc
3. Called Jim Lucy about letter + "Awards EPA"
4. copy of final memo Barry → Dale on TMDL/MZ (R2)
5. Janet/Barry: Illinois Program Plan review from Chicago
   - Talk to Rob about program plan + statewide strategy
   - Barry says may be case of letting Dale nothing to do if won't send letter; looked at Rob's comments
6. Jeff Kneib (WDNR): MDNR + IEPA MZ info.
   ~~Barry~~ WR-2; wants IL + MI MZ info.
   - talks to Rob + Lloyd; sent info
7. Dave Rankin: ONRW info
   - revised 131 - tier 2½
   - revised WQS Handbook - federal designation
   - R6 WQS Coordinator: info on Illinois River ONRW
8. Betty Pugno (906-822-7373): CWA reference
   - Cite for CWA: FR#
9. IL fibs from Rob; note to Beth H.
10. Cynthia Holt: returned call; left message
11. Francis Isabelle: no answer
12. update phone #s (HQ); distribute HQ phone #s
13. Barbara West: Cuyahoga; current Ohio WQS; especially fecal coliform: FAX to 327-2827
    designated uses; NPS AER P.O. BOX 25287
    Denver, CO 80225; FAX'd
14. Ed Rankin: stuck on 304(l); IL, Marc; tell Ed that Marc will

11. Barry: wants activity reports expanded - more like newspaper articles

28 AUG 91

1. clear desk + mail
2. phone #s
3. Cynthia Holt: in Chicago
4. Kit Ballantine says ok for 05 SEP 91
5. Marie Winfrey: Ronnie needs to take the ~~off of the~~ TA; HQ will send the whole package so we can do double here
   - note to Ronnie, cc Marc
6. GLWQI, TWG (conf. call) meeting
   - Cynthia Holt: memo/draft (w/ Bradbury); will send copy
   - Joan K.: introduction; 13 issues resolved; 9 minor changes needed; 4 big issues (tier 2 h.l., a.l., wild.); BAF completed by Chuck Stephan
7. human health issues (Kevin Bruce)
   - Class "C" carcinogen issue: no change needed
   - dioxin criteria different than current Agency: possible discussions; base h.l. part in
   - tier 1 / tier 2



14-day test unacceptable by USEPA

   - non cancer: delete tier 2 (14-day); natural commutator to fill in slots; use PMN scoring process for tier 2 data requirements
   - substitute for carcinogens: implementation issue
   - bottom line for tier 2 is 28-day NOAEL; Agency will stand behind that; except BATS must be tier 1 (90-day NOAEL); G. THALKEN - should keep tier 2 for BATS

MARGE WEATHERS 2415: RENTAL CAR (89)

6.ii. what happens if don't have tier 2 minimum data? Ø or no limit?
is it appropriate to rely on dischargers for criteria data?
- it is legal to require dischargers to develop
- free rider issue should be addressed in preamble
- precedent setting, but probably good theory (@SAB design)
- but should be judicious in requiring such development
- must have tier 2 data for WQBEL
- reasonable potential for violation of narrative standard, BP
- if there is reasonable potential & data not available: Ø discharge
- M.V.P.: BPJ will lead to inconsistency; authorized discharge is central issue; Courts, CWA, GLWQA say onus on discharger
- D.M.(MN): reasonable potential apply to narrative?
- J.K.(R5): if less than minimum data, should limit be Ø or based on the limited data?
- M.V.P.: let dischargers decide if want additional authorizations (reasonable potential); not safe harbor for unknown effects
- EPA will draft some language on reasonable potential and methodology for requiring data from dischargers; no solid unified USEPA position yet
- EPA has reversed its stance on antibacksliding; doesn't apply to delayed compliance of permit limits; Deputy Office Director signature (in 1995)
- Options: ① no change ② drop EPA proposal w/ modifications ③ EPA proposal ④ drop tier 2 (picked #2, sort of)

iii. Schedule
- 28-29 AUG TWG closure
- SC & USEPA 05 SEP
- 19 SEP DA briefing

6.iii. - 25-26 SEP SC briefing
- 15 OCT USEPA workgroup
- 05-06 NOV SC ratify

iv. if > $100M, regulatory impact analysis, probably after proposed in FRN

v. aquatic life
- tier 2 replacement based on Chuck Stephan's work (table of random samples for ceriodaphnia + 1 other species or just 1 species); must close a %
- Ceriodaphnia is only requirement
- 80th % (3.6-20.5 factors)

vi. aside: talked w/ Ken Kenser & Mark Van Patten

vii. WL (Lead to Lake)

7. talked to Barry about GLWQI (finally structure & progress again)

29 AUG 91

1. clear mail / desk
2. HQ phone calls
3. Ohio EPA conf. call (George Elmaraghy, Cathy ?, ?, Jane, Mike, Dave, Tom Bonnacker, me)
Southerly NECR50: 3.5 ug/l Cd w/ 3-yr compliance schedule; biosurvey work to justify higher limit, but unsuccessful; site-specific criteria study; new Cuyahoga Rules in January '93; Cd alone standards ambient - we said no to permit mod.
- want to extend compliance schedule until new standards in effect (ship channel & site-specific Cd)

4. GLWQI, TWG meeting

i. drop bioaccumulation

over

1.11.91 memo to [illegible] - call Dalal

TCE & 1,2 DCE & DBCP & AA

4. i. - USEPA policy change: antibacksliding is not triggered by delayed-effect limits
- TMDLs
- option 1 vs 2 for aquatic life permit limit [illegible] in very different results; not sound on conservative basis
- move procedure 14 which stipulates 2 options
- CSOs + NPS; guidance should be more explicit; more work should proceed on NPS, especially (as proposed by Bob Benson); limit applicability on page 2
- variances: couple of changes needed for consistency w/ 40 CFR 131 (Fred Feltner); variance must be appended to Standard (not necessarily an actual rule change) & when distributed, must be physically attached; See G.: aside: if State has in their rules the ability to grant variances w/o subsequent rulemaking, it is ok as long as variance attaches to standard & permit public notice matter variances & in accordance w/ 40 CFR & State required procedure
- do not want to prohibit the ability to lower limits based on TMDLs than the Standard, esp for intake credits; statement at front of procedure (ok)
- don't want to exclude other than ½ detect as value used
- carcinogen additivity: actual data over default additivity; explain why no additivity ambient; recommend addressing interaction of non-carcinogens where same mode of action in same target organ (will discuss in preamble)

ii. BAF
- all tox 1 effort [illegible] possibility [illegible] leave as is for now (pending [illegible] BCF & BAF (technical)

iii. antidegradation: de minimis issue (HQ); EEQ-trigger appropriate mechanism? (highlight alternatives in preamble)
- socio-economic not available for comment; will be provided, but not necessarily final, by 06 SEP 91 for SC (Jim Grant concerned about not being able to brief his manager)
- cut off for BAF & definition of BPTS; 50 substances over [illegible] BAF [illegible]; 308 BAF → 52 substances; [illegible] BAF → 45; 1000 BAF 44; give SC list in order of BAF w/ asterisks by questionable BAFs & cut offs at [illegible] 1000 BAF
- drop "BPTS" name for "bioaccumulative pollutants"

5. Illinois meeting w/ Marc Tuchman & Rob Lepis - Rob wants chronology etc.; have Dale early next week

6. Ohio meeting w/ Marc Tuchman & Dave Kopf

iv. more than 10% total (instead of 50%) discuss in preamble

03 SEP 91 WEEK 94

1. comp schedule to Marc
2. file & clear desk/mail
3. look through Robin IL chronology
4. copy of GLWQI issues
5. call Lorraine DeSelle: out until tomorrow (Antideg. stuff)
6. Wally actually report to Ronnie
7. talked to Ronnie about TA for WI
8. memo to Linda on GLWQI & distribute HQ position
9. HQ structure sheet
10. meet w/ Marc on current issues
11. fall meeting: how many people coming to WI - ask Claudia or have the mask? 12. update plans for

04 SEP 91

1. clear mail/desk
2. read B1 regs revisions; notes
3. Meet w/ Barry, Marc, Bob, Dave P. (part), me on IL & OH
   - for MD meeting w/ Pat: agenda for FRI meeting w/ Bob; include permits items as necessary
   - next steps memo on Ohio EPA (Barry will raise w/ Mary when Dale briefing on Standards letter; must go forward (have chronology) (program plan approach needs letter to go forward)
   - IN & OH get early awards, not IL
4. talk w/ Pete & Pete about IL: gave draft copies of IL Standards letter; want to know if letter is (is it at least strong enough) & not does it accomplish everything necessary in IL)
5. Meet w/ Barry & Dave R on OH & IL
   - OH objection letter: be more specific on reason for objection; run it by Edward Flagan
   - IL: Pete think briefing is more comprehensive than Standards letter (from Dale's perspective); Standards wants to know if letter is a good & necessary step, regardless of other issues
   - CLWRI: IHR, RV, SC interaction; quality of product so far: overall, pretty good - some surprises, some below
6. Theresa Dabelle: out until tomorrow

05 SEP 91

1. B1 regs: read & note; memo to Barry
2. Judy Kenar: will send copies of final and border revisions
3. Theresa Dabelle: Bill Wentsel doing antidegradation
4. call from public: floodplain (AC-E) & asbestos (5A)
5. Claudia: looking in on Indian workshop; Barry will also be on case study panel; possibly moderate
6. sign-off Grand Portage permit (no review)
7. sign-off Nett Lake permit (no review)
8. Barry Shepard: find out IHR & Region 5 actions on 6 X-sector allowances of acetic stuff; and CLWRI & B1 stuff; talk generally

06 SEP 91

1. memo on B1 revisions; final; distribute (& package rule)
2. memo Bryson → Diamond to sign off
3. copy of 123/130 RBR comments to Barry
4. RE #40: Regina will not on Natural Voices Rule
   - memo to Barry
   - talk to Jim Lazar
   - reason for FRN;
   - review info
   - alert Marc/Bob/Ken/Dale
5. Gill Hunter: will be in Denver & bring some more materials; we will talk to Gene in WC on TVES about possible discussion
6. Assemble materials for Denver trip
7. talk to Marc about Bryson → Diamond memo
8. look at voice mail info
9. NHR discussion w/ Pete Rowe & Jeff Taylor & Dave Pfeifer
10. matter stuff to Dave P.

09 SEP 91 — 12 SEP 91: WQS WORKSHOP (separate notes) WEEK 95

13 SEP 91

1. revise 40 CFR 131 memo per Ohio comments; attach my comment; to sign off
2. IL briefing for Dale [Dale Bauer, Pete, Peter, Rob, Ronnie, Marc, Bill, Dale Rankin]
   i. Barry: Major issues in IL (detail what must be done)
      - Program Plan
      - WLA agreement
      - listed to disappear WQS (portions) (implementation)
      - Upper IL R.
         - comment letter on program plan for Dale's signature by next week (FAX to Lentsch's office)
         - WLA draft letter Dale can look at
   ii. Rob Repin: WLA agreement
      - TMDLs: just doing WLA; doesn't stop approval of application
      - MZ: must make conscious decision to allow MZ; allow default 25 acres (max, in rules)
   iii. Dale: talked about cooperation letters; section of getting on board for the SLWQI: "all or some" - SLWQI proposal will ask for comments on national application (Malcolm agrees)
      - need "in the event" deadline for IL; need to go on second move w/ State
   iv. 3 letters: Program Plan, WLA agreement, WQS disapproval

v. Peter Howe: IL River (must consider new Standards)
   - can't allow 5-year permit reissuance if TMDL not done (Dale agrees; discuss w/ State + permittees)
   - Begin 5 position summary on MSD by late by NOV
vi. Will have 1-2 day meeting w/ IEPA @ ~NOV
vii. Ohio: ready to go forward w/ calls, letter, proposed promulgation
3. Dave Pfeifer: will call Bob Reitzman about letter + promulgation ~~Betty added~~ - also memo Barry → Dale about calls + sign-off
4. Barry: talks to Ken on MO about Ohio letter + promulgation; 131 comments (option 3 translates); other standards issues; Dale said he wants numeric standards in all States
5. travel voucher to Ronnie
6. 30 copies of OH Standards & WQS review (to Ronnie)

16 SEP 91 WEEK 96

1. Barry: Ken says he has 303(c)(2)(B) comment on 40 CFR 131 since Dale wants it.
2. Bruce comment letter; to Marc, Barry, Ken (Dale?)
3. travel to Helena, MT

17 SEP 91

*WQS for Indian Tribes in Helena, MT
1. Claudia: introductions
2. Marc: traditional invocation (otter); intro. welcome
3. Dave Sabock: introductions - intro 3rd to WQS 17
4. Jill Mentzer: WQS Regulations: Indian Tribe Rule

i. Dispute Resolution mechanism
ii. Treatment as a State
5. Billy Wagner: Designated Uses / UAA
6. Billy Wagner: Strategy for clearing use classifications

18 SEP 91
1. Doug Moulton: Legend Lake
2. Legend Lake Tour
3. Legend Lake panel discussion
4. Tour of Forestry office - description
5. Dave Lebsock: Policies (MOE, Antidegs, etc.)

19 SEP 91
1. Amy Leaberry: WQ Criteria
2. David Allen: NPDES; uses of WQS
3. Dave Lebsock: time for criteria development

24 SEP 91 WEEK 97
1. call Sue D. about GLWQI: left message
2. clean desk & mail
3. file
4. prioritize workload
5. Talk to Dave L about Buraham & Reynolds Metals permits; Promulgation, etc.
6. Talk to Barry about meeting w/ OEPA
7. Talk to Jane about lodging issue permits & hanging tags on WET limit requirements
8. Bergson → downriver letter signed, distributed, mail, FAX
FAX to Lebsock
9. Update Cuyahoga & Independent application records
10. Get GLWQI package from Mary Willis' office
- talked to Barry about going to GLWQI
11. memo to Barry on WET dyestuffs in Ohio

25 SEP 91
1. travel voucher for WE
2. talk to Wayne Davis about bioassessment & A53/A02 & & possible reorganization
3. Talk to Ed Hammer about declassification field demonstration & WLA agreement letter
4. Read through WLA agreement letter; make notes; sign off
5. GLWQI : SC
i. schedule
- go over all issues since meeting
- SC notification in NOV
- USEPA proposal (not final)
ii. minutes
iii. BAF (Dave Mascheuitz)
- 1000 BAF cutoff ≈ ~~BAF~~ level where BAF starts to significantly exceed BCF; 48 chemicals (9 more if use BAF of 250)
- Public Comments (Organize & Tim Eiden)
iv. WL Criteria (Jack Kelbaugh)
- must have bird & mammal data for tier 1; can't use LD50 data alone for tiers 2,
- use GL model animal for WA, FA, WTA (OTTER MINK for mammal; KINGFISHER, OSPREY, GBHERON, MERGANSER, for bird; similar to HH from rat data

25 SEP 91

5. 14- public comment (Eades & Grady)
6. Conf. Call w/ Ohio EPA (George Onuschy, Paul Novak, Dave Pfeifer, Dave Allen): response on Burnham & Reynolds
7. Talk to Ken Tapper & Jane Dakos Bonna - offer trigger option: absolute bottom line
A. Call Paul & George: no go (they won't put limit or trigger in, even w/ compliance schedule)
9. OLWQR SC
i. Comments from General Public

25 SEP 91

1. memo on rationale basis for permit objections
2. talk to Dave P. (Betty) about Burnham & Reynolds; mention to Jane that Ohio EPA rejected offer
3. OLWQI: SC
i. Implementation (Jane Dakos Bonna)
- Ohio EPA doesn't want tox 2 to override WET & biocriteria attainment data [i.e., independent application shouldn't apply to tox 2]
- Ohio EPA doesn't want chemical #s to apply to waters w/ UAA [e.g. MWH & LRW in Ohio] [not chemical limits]
- homelody plus Ohio EPA don't like restrictions on site-specific criteria for WL & HH & BAF
- Ken (EA) wants changes to TMDL procedure: use in antidegradation di minimus; TMDL a for individual substances; definition of TMDL: includes substitutes WLA in reality
- Ohio EPA: concern about bioaccumulation requirements limiting water conservation & [illegible]; agrees

3. i. - ; State discretion to allow MZ where PZ or water conservation improvements & load reductions have occurred
- IL EPA: wants language on requirements for discharges determined by EA & high flow allocations above 25% ; determined by agency not permittee (typo: agreement)
- MI DNR: concerned about di minimus level in antidegradation being driven by small allocation in TMDL procedure; R3 also has a comment related to this
- Jim (EA) need to mention LaMP role in TMDL process
- Ohio EPA: wants allowance for ZtIOs to propose ambient criteria becoming effluent limits; MI does not want to include ZIO (but can be site-specific); IL doesn't like eliminating ZtIOs
- MONR & several others: shouldn't use fraction of data for compliance; only for research assumptions
- IL EPA: should have 3 years compliance schedule for data development plus 3 years to come into compliance; currently have only up to permit expiration (5-year total); some agreement for recognizing variable time requirements depending on type of study required
- PA objects to additivity when use 10^6 (OLI uses 10^5)
- IL EPA & OH EPA want ZIOs for WET also
- R3: background when H_2O source from outside surface water in basin - clarification (agreement); PA makes discharger responsible in all cases & have won in court; EN - internal conflict between TMDL & background (clutter allowed discharge above WQS; implicit variance (bad); OGC opinion formed charge (can't permit discharge above WQS); EPA will work on it

3.i. - Sentinel: change shall to may on variance language; also language in WQ change (water body as a whole)
- IL EPA: does not have authority to grant variance; Board responsibility; Can only recommend to Board
- IN DEM: only socio-economic applies to discharge-specific variance; other 5 should not apply; add "where appropriate" (Joan)
- IN: no language on how to do variance socio-economic demonstration; not addressed here, but is in antideg.; MONR doesn't allow variance at all
4. Ed Hammer has 3 letters to IEPA: WRA against letter - variations per Dale's comments; Sierra Club/Prairie Rivers Network letter - status unknown; FOX Valley Citizens letter - don't know origin or status
- left voice mail for Rob to call Ed.
5. Dave Pfeifer: ohio permit mod. to allow BAT discharge that could be toxic; should we recommend or possibly force WET monitoring?; Dave looking into more info.
6. PLWQI: SC
ii. Antideg. (came in late (2:15 pm))
- IEPA: is Antideg. de minimus a reasonable purpose for requiring a TMDL; WQNR & MONR-could determine assimilative capacity w/o doing full TMDL; R2 agrees; could not address de minimus for non-BCCs (Joan); agreement to keep de minimus requirement w/o triggering full TMDL procedure; use "assim. cap" (full) rather than TMDL determ. capacity

- MONR wants de minimus or full assimilative; not removing from TMDL
- Joan likes floating de minimus; group stayed w/ assimilative capacity at certain date (e.g. date of reg. or date of last permit action)
- R3: necessary de minimus = significant; especially where large assim. cap. exists
- IEPA: how to do antideg. for NPS; Dale need separate discussion w/ other media (R5 can lead; launch ASAP)
- MONR: disagrees w/ automatic significance for BCCs (e.g. groundwater clean up, etc.); language to allow but require max. possible treatment
- IDEM: economic issue is not basin-specific; should be considered nationally to prevent economic "race to the bottom"; IEPA - for GL only! can't apply for nation; any language on National applicability will be shown to States
- IDEM: antideg. should not prevent new discharge better than background; said avoid option
iii. where to go from here: ② conceptual proposals & discussions will take place - get to TWG & SC ASAP ③ NPS work will start soon (& intermedia tox. info) lead by R5 ④ TWG meet one more time (1 day meeting) ⑤ NOV 6-7 meeting SC final. OCT 9 district, OCT 14 (week of) TWG
- MONR - wants continued State involvement
- after Nov 7: Red Border Rivers will start; FRN March 18, 1992
iv. Public comment: fr. Governors; Superior portion; mass loading for antideg.; REQ

DMA 3:15 can Harlsport pollard Raymond

22 SEP 91

1. notes on Dave P.'s memo (chlorpyrifos - WRT)
2. memo on narrative basis for objection
3. help Linda w/ Antelope "de minimus" in WI
4. help Sally Howard w/ narrative & MR requirements in IL
5. talk to EPA wetlands OW contact about barbecued discharge
6. talk to Amy about MPCA WRS: Escoli; Thompson Bay; Lower Cantwell; DAF; etc.
   - asked Amy about dichotomous briefings: Amy & Marc can go
7. work through WRS approvals
8. get STARS commitment info from Frances Dadd
9. talked to Jerry in R5 about Federal PCB criteria guidance

30 SEP 91 WEEK 98

1. IL WLA letter signed & sent (Fearon)
2. memo on '91 STARS
3. Brenda Lasker (MONR): update on National Toxics Rule; if final, what effect does further State action have
   - Kent Ballantine: 90% w/ 1 abstention (RS) for Red Border Region; also from ORD; [redacted] R.B.R. is proposed; w/i year final - [redacted] can be issued in interim
   - tell Brenda: likely final R.B.R. w/ 2 years to final FRN + regulation; likely Regional disapproval if as current draft; if advisory committees approved or authorities to take advisory recommendations severely limited, could possibly approve & avoid final promulgation; letter also made to stress all of

CITY OR LOCAL GOVT. HHH
STATE / FED. AGENCY HHH
(HIGH SCHOOL II / COLLEGE)
ENV GROUP I

4. Frances Dadella: how many video requests & to what kind of agencies (by the afternoon)
5. briefing memo on narrative WRS / permit objection
6. Dan Dudley
   - needs few day notice on FRN when ready
   - antidegradation: narrative as will FOIA only (attorney client privilege)
   - don't understand why FRN for biocriteria - no comments on OEA proposal; will send letter saying inappropriate + not appropriate

01 OCT 91

1. clear desk & mail
2. review FL letter on F6 & TRC - help Ed w/ Bruce
3. talk w/ Pfeifer about OH promulgation
4. TMDL meeting (Rob Burd, Bob Barron, Dave Alb, Bob Redmon, Jeff Zagar, Bill Melville, Linda Bob Tolpa, Margaret Shields, Paul Thompson, Gary Dillon)
   i. WI has done WPS LA in TMDLs from many back (Redmon & Zagar) (1973-1977); give any background info. to Rob
   ii. LA MP: coordination needed; comm. ttee
   iii. Ground water: working w/ NW EN; how get other programs involved
   iv. NW EN
   v. Regional guidance: Rob will develop outline: chapters will be developed & written by individuals (Zugale)
   vi. State TMDL agreements: how fit in; prioritization
   vii. Meeting in ~3 weeks (05 NOV 91)

708 998 8000 Mike McMahon

5. Bonnie Cryatal (HQ 280-1327) called: RS memo to Walcott due today
- found Walcoff memo w/ John Dowd & Pat Bonner (not controlled)
- modified previous comments for RA's signature
- through signoff; explanation for Rose Freeman & Jon Westlake; FAX'd by Rose Freeman at 4:30
6. left message for Sally

02 OCT 91

1. distributed RA → OA memo (303(c)(2)(B)); Phil Dale; Valerie the inside RAA (read last paragraph)
2. help Ed w/ dl. Fe criteria: great input comment that permits must use total recoverable (Dave Covey)
3. helping w/ Colin MN: measured entity formula - Gold Book reference
4. sent memo to Larry (copies of several standards related RS letters & memos)
5. called Dave Dalock - got signed FAX
6. Bonnie Dabelle: video end of year; Standards end of year; location for RS multi-Regional workshop
- wrote, FAX'd, & sent memo
- called to suggest Door Co., WI for multi-Regional Workshop
7. looked over MI letter (303(c)(2)(B)); comments; sign

03 OCT 91

1. update & print intro to WQS
2. update STORET info; FAX to [illegible] Bonnie Dabelle; Bonnie Arquette; Dan Bainbridge

280-7581

3. signed $80.00 travel advance authorization for Bonnie (Dan Hall)
- TA & letter form to Bonnie
4. talk w/ Ed & Pete Rowe about IR Lookout B letter
5. intro to Standards for Planning Unit & new standards people

04 OCT 91

1. revise IR Robert B disapproval & give to Ed
2. computer update & file maintenance
3. talk to Barry about Narragansett WQS, MDNR letter, IR-PA letter
4. talk to Dave L. about coverage for R1 → R1 WRI SC
5. Messages: Bonnie Dabelle
Brenda Sayles: National Pub 777 335 4198
Mike McMahon: 708 998-8000 (GOLF STOP)
6. Edit Cuyahoga promulgation (Pfeifer)
7. Call Houston Polinsor about copy of Natural Policy on Boundaries - also left message for George Gelson;
8. Pat Bonner: FAX National Topics Rubinfo to HQ (Control #92-01 due Oct 4, 1991)
-FAX'd to Betsy La Roe (280-4852); confirmed w/ her (280-4524)

08 OCT 91

WEEK 99

1. sick

09 OCT 91

1. Clear desk & mail; file; review National Topics Pub letters
2. worked on total presentation for SETAC w/ Rose (no draft yet)
3. talk to Ed & Amy about asking questions & coming up to speed & figuring out what to work on

4. read Dave P.'s latest draft of Ohio promulgation
5. Section Meeting
- Federal Compain
- Wallace Bahr
6. Meeting w/ Betz (Pete + Bob, Dave, Ed Masters, Marvin White, Bob Bastian, John Shukas, Dwight Davis, Ray Mateja, Dan Heft, Betz
- Selva Mussel contol: need WQBELs to prevent impacts, especially mod fish studies; we have started dialog to permits w/ preliminary info: in (Pete, Dave)
- Betz: want definition on studies required
- measured as Nominal [ ]; QA/QC must be specified; want to write a general permit (Pete H.)
- Betz: have been looking at registration mainly
- Pete H: we need info. on toxicity of combined form after detox.; Bill Bolton + OTS will handle studies regeneration + review
- Betz: studies completed: LC50s on 2 species w/ nominal [ ] + states (should be 3 species, actual, flow through), state 7 day renewal chronic studies: growth impairment difficulties w/ chronic studies because of feeding
- disagreement over whether combined form is toxic
- use real flow through acute + chronic of "detox" combined flow
- foaming is from dead organisms
- 0.2 ppm is detection level
- also need toxicity data as function of hardness (Bob M)
- looking at TOSCA protocols for degradation studies
7. cover memo to distribute Ohio permit draft
8. FACT's 1st draft of Ohio [illegible]

9. Meeting on MONR letter
- previous version marked up by Jear → Pete → Barry; latest version needs some Dave (Barry worked on it)
- Barry needs: 303(c)(2)(B) guidance, WQS Handbook, regs for basis of MONR letter; gave back 3 versions of letter for us to look at
- Barry needs briefing note, Topics strategy, Ohio regs, Recreation Policy, for Dan Heft meeting
- Narrative basis for objection will be difficult and
- Barry needs Docket B for RL letter - Jeff Ed.
10. Gulf Meeting: Oct. 17-18 meeting in Chicago on Wetlands WQS
- Janice Chang called Jill; dealt w/ Janice
- Dave Chipman (MONR) told Jill she should be there, but HQ is letting RV handle it
- she (Jill) will call Dave P. on MO.
11. Mike called about OH promulgation: should it be designated WWH? yes - OMB consideration; Standards Unit support designating WWH though + OSRO "jud. appl." now
12. highlighted 303(c)(2)(B) guidance + Natural Recruitment to Barry; Also WQS Handbook, 40 CFR + CWA cites
13. Note to Dave P. to give Barry OAC 3745-1-06 + 07 + Topics strategy to Barry

10 OCT 91

1. computer file maintenance
2. talk w/ Amy about MN
- permit issuance; variance + program plan
- Students issues [D.O. daily min. no. meters, fec coli vs. E. coli; methods WQS; narrative biol. criteria]; conf. call 24 OCT 91

3. Nancy Kelbaugh - FW WRS → NPS control; authority there?; FW is asking a policy for NPS enforcement

14 OCT 91
1. computer file maintenance
2. look through HQ files for info
- put out incl. MN for Amy
3. Reg Baber: may not be possible to strike-out or re-write State code; must (at least letter to) write affirmative promulgation; will have more specific comments later
4. file
5. Howard Jok: MN dioxin question; length of time to develop ecological risk assessment
6. read over Region comments on MOAR letter
7. Brenda Pulley (FAX 202-775-4183) needs WI WRS (NACR) (recycling)
- also gave # of drinking water
- gave to Ronnie to FAX
8. Claudia: will schedule trip to Bad River Reservation in Nov.: they want to set time frame for dealing with
- also Shawano Paper antidog issue; must P, only have primary treatment
9. read Attorney GL letters

15 OCT 91
1. AQUATPL
2. TSD workshop
3. MOAR letter to Linda

WEEK 100

16 OCT 91
1. letters to Ronnie & Shawanese
2. TSD workshop
3. call Deb Klassner
4. Patty Morris: annual report by MD
5. talk to Barry re: about annual report & dioxin

17 OCT 91
1. talk to EJ & Mark about IL MZ guidance
2. look at STARS info.; call Marjorie Pitts (left message)
3. Howard Jok: told him about dioxin criteria update (no change until all species in 14 years away)
- we called MN (Gene?)
4. AQUATPL
5. training form for LAN to Ronnie
6. TREE
7. Marjorie Pitts: will look for info. from Debelle; will call if need re-FAX; FAXed
8. ATM card (got it)
9. file FW & Indian & ground water

18 OCT 91
1. TREE
2. conf. room & memo for MZ discussion on 24 OCT 91
3. Marjorie Pitts: will put MI in STARS as PP/disapp. action this year; & in Promulgation this year; went over attainment, biocriteria & wetlands (antidg.); about down WI Wetlands WRS in 2nd quarter; MI Wetlands WRS in 4th quarter; IN & OH Wetlands done now; OH biocrit. (antidg done now; MI antidg done now

91-93

4. Amoco conf. call: cut short by Jim Park / McSwiggen because he [illegible] (before I arrived)
- must call w/ Dave M0
- talked w/ Peter about issues

5. Iowa V.
- WONR: methods: disapprove designated use; approve variance condition by 93
- WONR: PCB concern - no; that portion disapproved on June 15, 1989; Dave will send Dave note reminding to send formula, info
- MONR: Rule 57 - Barry's letter

6. MAMMA
7. receive typos from HQ; to Ronda for distribution

22 OCT 91 WEEK 101

1. [illegible] Annual WQS memo for Patti Morris
2. home sick

23 OCT 91

1. SICK

24 OCT 91

1. finalize & FAX Annual WQS memo for/to Patti Morris
2. Bar mtg
3. call Magia Lab (1-800-966-2788) (Environmental Enterprises) for
4. Dave Swan: left message: Iso monitoring lab - who is county
5. Smith (3-4990): missed meeting & Region 4, 5, 8: needs list of permittees w/ WET: ask Joyce, Wayne

6. Prepare for MI talk
7. give MI talk (Margaret on modeling)

8. read over Amoco's memo to Wardy
9. Amoco meeting w/ Ken, Jack, Pete H., Ed, me, ORC (Ken?)
- 3 years to meet 1, of 1A; do TRE; if not permitted because I not contribute to use impairment, then MZ may be approved
- could proceed w/ public hearing & write permit; could issue short permit (2-3 years)
- probably will knock down to 1 - don't want public hearing
- PCB public hearing date (about 6 mos); Joliet? - Pete start talking about it; draft up permit; lawyer → Lawyer w/ DEPA
- inform compliance (fluoride case ongoing)

10. Ohio (Ken): Ken wants to send memo to Gary Morton
11. Meet w/ Ken, Dave, me, Roy L., Matt G.) on Ohio proposal
- Roy P.: don't want to re-write State law; what is exactly that, but must be careful w/ how to do it
- "supersede" vs. "streamline"; use KY version vs. AZ
- supersede + waste
- Ken: summary narrative: why simply state that water segment not regulated
- Matt: find out how got from no explicit use to default to WWH

12. Meet w/ Dave P. & Roy Pallesen: Dave will start drafting MO; I will look at it Tues.
13. had Dave P. + Sonia look at MI info for Natural Outlet Rule; change "2" to "3" for designated uses
14. called Pat Ballantine w/ MI typos; he said probably sign today
15. looked at + filed "Awards EPA" w/ info on Natural Outlet Rule

25 OCT 91

1. leave okg for WKD
2. read over Ohio CLWRT info.; ask Ron if he wants us to draft a response; make copy
3. fill out order form for business cards (send next week w/ 8/15)
4. clear mail
5. read WL titles
6. look at Lorna's letter to WONR on ~~wetlands~~ WQS; comments to Lorna
7. Amoco conf. call (Ron Dunn, Pete Rowe, Pete Palmer, Ken Bruner, Jack Newman, Carl Hammer, me) (Jim Park, Bob Moser, Tom Medwick Ed?)
   - IL doesn't want TOTAL limit now or w/ compliance schedule - will just appeal for another year
   - Ron firmly stated need for limit (w/ time); we're ready to move forward as necessary
   - DOC data not worth much (Jim Park) - they haven't seen it - met w/ Amoco next; will tell them same thing
   (date: week of 13 NOV 91) (18, 19, 21) (Glad)
8. Note to Ron on CLWRT CH proposals
9. Look through CLWRT IC info.
10. Rose Duncan: met over Cuyahoga & Ind. Appr. of likely DEPA response; told her sign off 1st or 2nd week of NOV in RA's office
11. list of WR State coordinators to J. Carl for Ron
12. Marc: need perf. standards by end of NOV
13. Read FY 91 annual report; route to mgt
14. Memo re
15. AQUATOX
16. Look through RS Robt Hardy - Env. Indicators

DAVE HANSEN WONR
site specific WQS 4:20 ~ 6:40

29 OCT 91

WEEK 102

1. Larry Shepard: talked about RT & RS activities, etc.
2. Ken Stromberg: sent memo recommending me for position; told Ken about school problem; is concerned looking at Sacklogya - Manitowoc area
3. Kelly Moore: want me to attend conf. call w/ WET on site specific criteria (1:30 Tues office); talk to Kelly & Cathy
4. told Ronnie to send tapes soon
5. Lorna wants comments on WET & standards tables
6. Ed wants to know what's going on w/ NH4 standard in RL
7. read site-specific in WQS Handbook: p. 4-16 to 4-20
8. talk w/ Dave P. about ORSANCO
9. Clark Stoops: Cu-EDTA is hot topic; small possibility that other complex metals could limit w/ EDTA & release; also possibility that EDTA could degrade downstream; developing a Cu-EDTA criterion (or WET) does not fit ideal need for Cu criteria; some policy aspects - talk to Charlie Delos; site specific methods use site waters
10. Charlie Delos: left message
11. note to Ronnie: tapes to Mr. Stupe, Manitoba Dept of Env. (204-945-7049)
12. Nat'l Stds Conf. Standards due to Marc
13. Jan. 22-23; TMDL workshop (keynote from copper/Silver; WONR: Lorna, Dave, Ken, Steve; EPA: Kelly, Cathy)
14. Conf. Call w/ WONR on site-specific Cu criteria
   - WONR agrees that EDTA addition will help WET
   - list not from specific Cu; can use '83 WQS Handbook for site-sp. Cu (ambient water vs. lab. water for indicator species procedure - water effect ratios)
   - discussed pros/cons; I will [illegible] our specific contacts & Dave Penrose

15. sign stopes cover memo to Blake for Ronnie

30 OCT 91

1. talk to Amy about MN call; read Bob's notes on program plan
2. Jesse, Blake Christopherson, Vern, Anderson MPCA, Pepin, Taalman, Kelka, Schumacher, Alb EPA (conf call
- UAA on Class 7 streams: looked at them in the past (Chapter Bryce) designated - did studies & sent in (84-85) according to Rob Pepin (77-78-79-80 lapsing in 1980; few done since then each year) - we will check files (Blake)
- Rob's comments on program plan: SP should contain all procedures & policies; need list of surveys that will be done; watershed system-wide will BPJ (by) be updated in relation; prioritize TMDL list; (acknowledged (Blake)
stream (biocid/chemical) vs biological surveys; WLA agreement; clearinghouse reports (August ??) - will send list for them to look
- Amy - Pearson's comments on UAA; they will send statement that UAA hasn't changed
- Amy E. coli vs. fecal coliform; they have another draft letter in the works - she is proposing some changes
- they need water division organization chart w/ responsibilities
- other issues: Lake Superior ONRW, Lake Pepin modeling effort - want to avoid technical arguments - keep it on policy issues; EPA should be involved from early on - want us to come to meetings; GLNPO

- schedule another call for next month (DEC 3ND 10:30)
3. Howard Jan: HQ working on fish consumption rate - need Regional person & GLNPO #'s document; he will check w/Jan; I said that I would participate if requested
4. Chris draft promulgation review; to sign off
5. talk to Ed about FL issues & status of letter
- recommended that Ed write memo to file best document issues; possibly recommendations on unit/section practices
6. GLNPO note April → Ronni; from Elsie → Dan Huff → me → Joan
7. sign Jordan w/QS cover memo for Ronni
8. talk to Dave R about ORSANCO, OH promulgation
9. talk to Ed & Rob about FL NAV criteria: 1.5 technology minimum; 1.5-15 that corresponding to 0.04 microgm/l; 15 max

31 OCT 91

1. AQCAPPL
2. file
3. FAX OH promulgation to Schaub; copy to Bryce w/note
4. talk to Dave P & Linda about WI Wetlands
5. talk to Ken about GLNPO Fed. Reg. letter to OEA; WI Wetlands WQS; Ohio meeting
6. revise & print letter; Dennis → Martin; J.K. sign off; to the w/letter copy of Incentives policy
7. sign-off on GLNPO approval of NR 105
8. Rainbow Farms
9. Dan Goodman: Amy → Vicki Hagins (WORK Thursday 414-492-5904 Hotel Du Nord, Sister Bay, WI, John Wittenberg 1-800-562-5557

10. read WE & standards & Lonnie comment letter; talk to Peter Swanson; revision to Lonnie
11. Original WQMR RCB version from RA → Ken-ME; copies to Betty (approval) & Lonnie Lee
12. talk to Barry about Ohio meeting next week; Blanck SC meeting next week; OH promulgation; WE RCB fraction during Rule action plan (copy to Barry)
13. Bill Melville: OH meeting Nov. 7 1:30-4:00. Bill will cover; Rob will cover fish meeting; Dave L. will cover Blanck meeting; I will go to Seattle meeting

01 NOV 91

1. AQUATPL
2. MAINMAR(O)
3. look at Kelly's notes on WI site specific call
4. look at MN aquaculture proposal
5. Ray Bauman: subjects for OPNW meeting: WET wilgard application; WET W/E NPDES requirements; WQS promulgation wilgard application; WQS promulgation Cuyahoga
- notes to Jim & Dave L.
6. Gill Minter: left message; left note on Dave L.
7. Charlie: Wetlands meeting before Red River - go up 19th; stay in Cheyenne Gorge; note to Bonnie
8. Beef standards to Bonnie
9. Rob Goldstein: sediments; gave Marcia number
10. Read HQ's Regional Annual WQS report; route
11. Pick up Seattle tickets & $ (Bosa) for Mon & Tu
12. Barry: visit WE press release at HQ on National Topics Rule
- we must contact all states & areas to cover in
- told Barry

Bell Atlantic 1:30-3:00 NOW 7 108-4 conf room 5-1504

13. Barry/Glen want to find out if we have latest version of Rule 5 proposal; he wants copy plus latest version of our letter; told Lonnie
14. Brenda Taylor: left message; FAX'd new rule 5 / subrule 11
15. read & file paper trail for Martin Marietta
16. New subrule 11, & previous draft of Rule 5 to Rob
17. read new subrule 11; talk to Ken: only Lagg is who pays for advisory committees

04 NOV 91: SETAC meeting WEEK 103

WQ Criteria

1. Preliminary estimate of water [ ] SE protection of WL
- approx. 1-2 pgs
- being looked at as methodology for natural criteria
- won't affect SE criteria if national guidance any time soon (current ~ 5 ppb)
2. Multivariate procedures to select topics, similar species for developing ambient WQ criteria
3. Development of seasonal ammonia criteria
- addressing the 4 questions in EPA criteria document
- FAV 0.7 mg/L at 20°; but lowest to 0.5 mg/l because of some trout data (should apply to cold water;)
- limited invertebrate data at various temp.
- very little chronic coldwater data
- not much guidance for effect-dominated freshwater areas (rules for all criteria)
- DE/MD show data on ephemeral streams (barely shaded, sandy soil, acidic, some background NH3); poultry processing; >8.9 pH; 12° & 20°C water

cont.

3. - invertebrates respond to pre-ionized NH_4^+ more at higher temp as reported in culture dilutions; however, invertebrates showed opposite
- FAVs at 20° & 12°C of ionized NH_3 is lower (more toxic) at 12°C
- if take out coldwater species: 0.77 vs. 0.52 FAV (can apply)
- functional data set confirmed in most respects

4. conclusions: site FAV similar to national FAV procedure w/o cold spp.; 0.52 FAV may be too restrictive for warm waters; 0.03 slope for ionized NH_3 vs temp confirmed for vertebrates, but opposite for invertebrates; FAV at 12° acceptable; protects by national criteria; amphibians should be used as sensitive species spec. for chronic
- Duluth lab: NH_3 continues to reduce in toxicity all the way up to pH 7.0 - doesn't level off as indicated by national criteria (Dr. Mount comment)

4. Sal.-tox. tests & stream side mesocosms in support of site-spec. criteria for Cu, Pb, Zn
- low pH stream; high TOC
- 0 allowable because of naturally occurring background
- 3 procedures for site-specific: resident species (amend) & site water; resident species procedures used; developed water effects ratio; pH pseudo-chronic
- lab data: used mesocosm
- lab results: lab vs. site water: ~5X increase of FAV except Zn (not significantly different); Cu 2ppb → 12ppb; Pb 4.5 → 20 ppb

- mesocosm results to check chronic; no detrimental effects on periphyton community due to Cu & Pb additions
- conclusion: Pb & Cu site-sp. criteria developed successfully & confirmed by mesocosm studies; probably some in-stream tolerance of species also
- minimum # of species for site-specific: don't know
- approx. cost of study: $ 180K - $200K

5. Acute-tox. tests of Cu using site waters for site-specific
- NE, KY; fly ash discharge up to >5% of stream
- resident species method
- use of data; metal speciation; use of biotic organisms to protect biotic ecosystems; issues

6. Reference of site-sp. Cu criteria for protecting (Cumberland darter, Clinch River, mussel spp.)
- coal-fired power plant; 152 hardness; mollusca gone for 20 mi downstream (after spills); fish intolerant to waste - guess they'll come back after spills (appear to)
- very good diversity of mussels in Cumberland darter
- only 2 species w/ outfall plumes
- current Cu standard does not protect a number of mussel species 19.4 vs 20 µg/l at 152 hardness & 12.4 vs. 16 µg/l

7. Statistical bias in hardness-dependent metals criteria
- log-log transform; linear regression; R² & log-log; back-transform
- problem w/ last step - introduces bias; predicted lower than actual toxic level (overly stringent)
- easily fixed statistically; known for some time in many fields
- bias in actual criteria: 2% - 5% depending on species parameter; should be examined & corrected (easy)

7. - also a number of other places in water quality use similar back-transformations
8. Limitations on TEFs in setting standards
- PCBs dioxins, furans
- assumption of additivity; differential bioaccumulation; cancer endpoint
- insufficient evidence to use TEFs
- should regulate congeners individually or based of most sensitive endpoint congener - eg. 77?

B. Pulp + Paper Kraft Mill Effluent (Sweden)
1. Effects of chlorolignins on pulp mill effluents on the binding + bioavailability of organic pollutants
- look at DOC (dissolved organic carbon?)
- chlorolignins: MW = 1000, similar to humic substances; 5-10% chlorine; 1-3 better ~~disinfected~~ produced pulp
- AOX doesn't degrade as quickly as DOC downstream of mill
- Kraft lignin binds better than chlor-lignin
- specific binding; possible downstream release
- but chlorolignin does bind lipophilic organics + makes them less available to Daphnia magna
2. Hg in paper mill effluents; proposed permit limits + data quality
- inappropriate permit limits due to errors near detect level
- USEPA action levels; WDNR; GLWQI; progressively more stringent (esp. WI criteria)
- permit limits based on most stringent criteria; often below detect level: don't know if achieving or not in compliance
- false positives can cause problems
- WI example (P.H. Hesketh: Fox River: high background above standard; discharges not adding to load

- much variability when testing near detection level
- conclusions
Hg is ubiquitous; analytical variability should be considered; Hg studies should be carefully defined

05 NOV 91 SETAC
A. Environmental Issues in Eastern Europe
1. Pollution in Poland as example of Eastern Europe
- Warsaw only European capital w/o WWTP
- high mortality rate compared to West Europe & coast
- surface water not fit for industrial use (corrosive)
- air: O_2 21% → 17% 150 days per year
- very bad situation; must make plant progress responsible through market economy; not state responsible
2. Heavy metals in E. Europe (Czechoslovakia)
- central Europe hotspot for Hg, Cd, Pb emission
- life expectancy lower than Western Europe
- western environmental companies interested in Czechoslovakia
- Books & info.: "Blue Book" "Rainbow Program" scientific monographs, existing legislation, 1991 Czechoslovakia Academy of Sciences monograph on heavy metals
3. Ecological Problems in Armenia: no speaker
4. Organochlorine Contamination in Biological Samples from Polish Coast of Baltic
- not declining in Eastern Europe like Japan & W. Germany because of continuous input no. here
- data from 1971-1983: cod liver oil; porpoise; human adipose

4.5. Histopathology of Brook Trout from acid lakes in USSR
- acidity causes net ion loss which results in detectable physiologic changes in gonad, gills (microridge ↑); chloride cells ↑; gill epithelium thickness ↑)
- acid probably due to dry acid atmospheric deposition
6. Estimation of Strontium-90 distribution for radioecesium by migratory waterfowl following the Chernobyl Nuclear Accident
- predictions by Richards (regional values) at forested sites in U.S. (no negative exponential decline)
- predictions at Chernobyl indicate that 3-day storms in mesh will exceed EEC levels for aquatic
7. Heavy Metals in Czechoslovakia + assessment protocols in upgrade

B. EMAP II

1. Environmental Monitoring in Mobile Construction
- Mobile aerial vessel mostly; alternatives to avoid pollution
2. Ambient Toxicity & NPDES Management Issues in the Houston Ship Channel
- very toxic; study shows toxicity + nekton survey
- 400 dischargers; 1/2 of U.S. polynuclear aromatics
- shows runoff of Houston
- O_2, may be bigger impact on aquatic life than toxic chemicals
- LC_{50} ≠ safe requirements; no aquatic life uses designated yet
3. Fish Sampling Analyses: guidance for issuing fish advisories
- dioxin in river mouths of fish
- to address inconsistencies in State methods (primarily)
- use ODES database instead of STORET
- predator species + bottom feeding species recommended
- behind schedule because EPA/OWRR workgroup comments

B3. - sampling recommended to estuaries: $ + impacts on fisheries
- 10^{-4} risk level not protective enough (would be 10^{-5})
- PCB congener analysis issue
- 6.5 g/day not protective enough (140 g/day likely considered)
- current schedule: late summer 1992 - final

C. Economic Effects of Environmental Legislation

1. Economic effects of State wide Plumbe: missed
2. Valuing Ecosystem Services: Case Study: Atmospheric N deposition
- ecosystem can retain N + allocate N loading
3. Potential Atmospheric Emission Reductions from Hypothetical large in NPDES permitting
- NPDES causing loadings to other media; can changes be made while still protecting surface waters?
- use loading instead of [ ] limits; just maybe MF buggy; based costs to WWTPs through upgrades (assuming 2 stations)
- conflicts w/ HSD, GLWQI, 131 Regs; speaks against
4. Regulating Toxic Pollutant Discharges - U.S. + Canadian Approaches
- focus of talk on Great Lakes
- differences in GL State criteria + implementation
(1. GLWQI for consistency
2. FAV in R5 States
3. Detect not limit in R5 States
4. Ontario no State mixed bag; large differences between States
- Ecosystem Valuation Project
- Exec. Order 12291
- Econ. usually only measures easily quantified
- pressure in EPA to develop Ecosystem valuation methods

Decided to talk about Ontario

D, EMAP III

1. Development & Use of TBT & Rapid Bioass. Protocols in KY
- assess water quality impacts
- bluegill, water flea, salmonella, algae
- paraquat, nacho interlocking, fish
- 305 (b) Reports, database surveys, Background, etc.; reactive
- proactive use; reference reach program, monitoring, surveys, historical
- 11 layers; 7 ecoregions; 6-8 physiographic regions
- develop integrated database
2. Screening Risk Bioassessment Tools at a Hazardous Waste Site
- elevated levels found; affecting ecosystems

E. Aquatic Toxicology

1. Survey of NPS Inputs in Canada entering Everglades
- no acute or lethal effects (in canals)
- most affected are urban & agriculture; sugarcane
- different parts of Everglades react differently
2. Multiple TIE Manipulations in Identifying Cause of Effluent Toxicity
- Phase I Manipulations in tandem
- if multiple toxicants; identify (at a time; may be able to detect interactions
- specifics of lab analysis
3. TIE Techniques for Ironically Toxic Effluents
- identify suitable toxicants w/ same behaviors as the
- extrapolate to regions that pond summer; still under review;
- comments until Jan 1992
- several modifications to test procedures (different than permit requirements)
- modifications to each step (specifics covered)

06 NOV 91 SETAC

A. Environmental Ethics

1. Tibetan Dharma Teachings: A Vision of Totality
- respect for all sentient beings; some practices eliminated; treated
- balanced perception maintained
- Environmental side-effects may be useful in current Environmental movement (Environment not central of Tibetan thought)
- Chinese now causing many environmental harms
- may want to adopt some parts of Tibetan thought in West

2. Why Risk Assessment Fails: Disfer
- N. Amer, & European populations growing in rejection of quantitative risk assessment approach to take pollution decisions
- should ask what is best strategy we can do to ecosystem rather than how much can the ecosystem take
- risk assessment different than risk management, but in reality the 2 get combined all the time (management driven by risk assessment often)
- ethics of risk assessment: exposure to dioxin w/o consent & against the will of many; use of average person over-exposes many sub-populations; permits for dioxin is pre-meditated murder; permitted discharge is anti-democratic methods are beyond the capability of most people to analyze (uncertainties assumptions, etc.; permitted discharge assumes chemicals innocent until proven guilty - should be other way around; decision to allow toxins is not a matter of a last hazard
- factuality of risk assessment: what is best impact that can be achieved rather than how much pollution can be tolerated
- risk assessment shields bureaucrats & polluters

4.3. Environmental Ethics in Forestry Research

- sustainable forestry
- traditionally little research on "humanities" disciplines - mostly economics + management
- natural resource fields actively avoid ethics; "value neutral"; outmoded - ethics implied in fabric of many practices
- philosophy in forestry
- Aldo Leopold - Land Ethic, 1930s-1940s
- agriculture conference was limited citizens
- important to determine what attitudes & ethics currently exist

4. Do Ethics Affect the Outcome of Environmental Policy

- 2 opposing views in West looked at
- subsequent tendency to maximize energy use: common to all societies & organisms; very difficult to change but must be done to avoid needless extinction
- utilitarianism: expansion & profit & progress: current common view
- Romantic or "Green" View opposes: harmony w/ nature etc.
- Eastern Philosophies have also caused large problems: practical is not ruled by any ethics so far
- Aboriginal: also destructive
- Rome for early civilizations
- all based on maximizing energy use
- 2 inescapable laws of nature: competition & waste
- appeal & crash

5. Discourse, Ethics, & Environmental Respect

- our reaction to World more important than World itself
- must learn to translate science into policy

- agenda setting writers & Press: we think about what Press covers
- because insiders control what is given to the press (esp. when they benefit or can be hurt by the info.)
- no objective World: Truth is based on human perception
- the World depends on how we talk/think about it; those who control discourse have great power
- science must be translated to people for decision making
- most people do not think in same terms as science: substitute their thinking (results in Mythology & metaphor) and must translate to public; then accept probabilistic science

6. The Role of Ethics in Environmental Risk Assessment

- Risk Assessment: scientific; Risk Management: political etc.; how is ethics used
- Hazard identification, assessment, control
- what risk is actually faced by humans: 10^{-6} = 300 miles in car, 6 minutes in canoe, 4 cigarettes, 2 days in N.Y., 1000 mi. in jet, 40 tablespoons peanut butter etc.
- role of ethics in risk assessment: depending on normative (what is norm); is it possible to assess risk assessment
- must recognize subjective influence & deal w/ it

7. Regulatory Reality Check

- Biotechnology policies pursued are for economic purposes
- genetic engineering much more risky than classic breeding or natural mutations: faster, more unpredictable, more radical, less instructions on possible results
- ecologists recently supported stop of genetically engineered organisms; but could be largely due to desire to stay in limelight w/ practices

1.8, An Education Alternative for Sustainable Agriculture
- limited tropics 7% of Earth; but 50-60% of most countries that have them
- huge biodiversity: 50-90% of all species on Earth; O2 production, watershed protection, medical food, gene bank
- early paradigm shift policy to eliminate forest for progress
- United America currently has slowly declining agricultural base; current needs largely achieved future global considerations
- E.A.R.T.H. founded to educate students approach (entry level degree) (field validation) (solutions that will work locally all over)

9. Making Environmental Decisions Ecologically Based
- Regulators & Regulations become part of the problem: too narrowly focused, blind to other problems
- Good issues to solve / limited problem (e.g. spotted owl to save trees; MZ allowances when no assim. capacity)
- achieve goals through whatever means available
- assumption that we can truly base impacts w/o fundamental change is false
- 4 errors in regulatory purpose ① cross media impacts ② future notice ③ way of life impacts ④ balance matter can not be destroyed (treated not removed)
- problems for regulators: specific limiting legislation; common sense decisions are being eliminated by regulators; citizen suits against legislation; front line regulators are completely isolated from ecological broad-based considerations - no framework

B. Risk Communication
1. The Vital Role of Community Relations in Successful Risk Communication
- talk oriented to corporate audience
- explain risk determination, how determined; probably can't get agreement on what is acceptable
- in best interest of company to establish/maintain good environmental record
- good community relations result in good press; other way around
- new risky - may not work
2. Communicating Risk to Non-scientific Audiences: Misconceptions & Guidelines
- inform public so they can make own informed decision; goal should not be to convince public of a given answer
- media influence: reflects not creates pubilc perception; local focus on danger etc., however; emphasizing does not create
- don't wait until final results; communicate all along the way
3. Creating a Context for Risk Communication: no speaker
C. Wildlife Toxicology
1. Reproductive Effects of Exposure to Risk to Laying Hens
- hypothesis that hens will react to Cl food same as colonial birds or Cl
- carp & trout PCB (lab fed)
- control, low dose, high dose (carp PCB over fed)
- similar teratogenic effects as mink
- hypothesis supported
B.3, Mechanisms of Risk Consumption Advisory: A Study in Communication in Risk
- advisories often ignored, especially by minorities (study in Detroit)
- awareness of advisories not high
- familiar risks, voluntary risk, controllable risks, statistical victims, clear benefits to some

B3. - orders of magnitude overestimated by previous advice
- should use multiple simple messages w/ clear acceptable alternatives
- discussion must be at post college degree level - inappropriate
- use more than 1 source, opinion leaders, citizens for credibility
4. Risk Communication to Public: Children living in PA
Dust Contaminated Conversation
- urban problem (esp non PA smelter areas); parks & grounds; near buildings; children
C. 1. ~~Pathology~~ Subchronic Exposure to 2378 dioxin in Rats, Rabbits
- NOAEL 100 pg/g in egg [ ]
- no lethality / growth
- ½-life 378 days adults 13 days chicks
- subchronic effects: egg production
- overt toxicity lowest also has subchronic effects
B5. International Implications of Risk Assessment & Communication
- left: couldn't get into Lakonte symbol of gorge
D. Lakonte III Simultaneously Extinct Metals (Cr, Cd, Pb, Zn, Cu, Ni, Mn, Fe, Al)
1. Role of AVS in Toxicity of Metals & Mixtures in Lakonte
- SEM: AVS ≤ 1 : no tox. ; ↑ toxicity sometimes
- intermediate TU <1 : no toxicity; ↑ toxicity increases
- predictions of probable not those better than predictions of toxicity for SEM: AVS
- predictions pretty good but guess for TU intermediate
- combined SEM: AVS & TU intermediate very good predictor of toxicity
2. Determinations of AVS & SEM in Lakonte (including QA/QC WL procedures of pollutants Broadlawn) (Both high upper
E. WL Session
- no notes

08 NOV 91
1. Lori mail
2. talk to Ed about PL issues
3. talk to Dave P. about GLWQI SC
4. Meeting w/ Gary Grotton (Ken, Barry, Marc, Dave P., me, Mike Lin, Matt Stuckman, ~~[redacted]~~)
- communication problems
- OEPA reorganization & new faces: transition on both sides; Andy Turner retired: George Elvaraydy acting, selection - poor (12 mos)
- Districts: DWQPA very centralized
- Governor's Agency Operations Report issued poor: probably more core towards districts
- Ken talked about our set-up
- both upper managements need to contact each other before final actions
X - Marc one OEPA matter comments on March '91 proposal
- orientation process should be pursued; January - integrated program workshop - GL emphasis may be good basis of Ohio - Region 5 orientation as well
- LaMP / GLWQI discussion
- Cuyahoga River Channel: ~~corked~~ Dave but don't shoot; could ~~use~~ mutual cooperation; Gary will see about removing reservation; may be more limited; submerging
X above next week (Ken or Barry) Group ~~he~~ conf. call / [illegible] 9:00 am
- WET: objections; permit section final decision
X - Letter on import on Standards approval of OEPA's interpretation; PR: also permit basis (permit as a plan): also need face to face

- anti-degradation; internal OEPA work ongoing; proposal to OEPA; goal January changes; only State Listing ... seriously - hunting competition; will send something
- Toledo Harbor need some help; ... letter from Reilly to ACoE; were still working in Buffalo (avoid ACoE HQ)
- response letter to draft permits: make clear objective reg recommendation (3-4 form letters used)
- antibacksliding; Ken: delayed effect limits don't trigger antibacksliding until become effective; can put in limits which are contingent on something; OEPA will send examples; send WDNR permit example
- NPS communication; no budget officially - few people involved - plants only; hearing SCS about 1993 budget will include; also reorganization; OEPA: Ed Armstrong & Larry Antosh, place 3 staff; want to add stormwater who involved in RI; 104(b)(3) funds for stormwater & CSOs - will be more comprehensive this year; Tom Davenport & Peter Emerson co-chairs
- Cincinnati (major) by Ken; want to establish commencement for permits & agreement; Cathy Albro PE involved - ... will follow up; Ken wants to talk w/ Jon & Tom if possible; WEPA report decree too limited; public Congress will likely be upset; Mill Creek expired Oct 91; basin plan 93; better issue short-term permit
5. talk w/ Mark & Dave P.: should blast fuzzy on permeabilization to keep OEPA at the table
6. Ken Stromberg & John Blankenship (725-3510) got Grace Bay

12 NOV 91 — WEEK 104

1. annual leave slips for 11/29, 12/25, 27, 31, 1/2, 3 to Mary Jackman
2. left message w/ Ken Stromberg's wife - can't take Wt girls
3. left message for Janet Smith: told he had to turn down offer
4. travel vouchers for Seattle trip to Renee
5. call Charlie Dalo: left message
6. talked to Claudia & Dave P. about going duty 19 NOV 91; Dave P. will cover Duluth / Bad River trip
7. set up appointment w/ Barry & Dave P. about Ohio
8. letter to John Blankenship
9. talk to Barry & Dave P.
- OEPA: Commencement problems not related to Cuyahoga & Ashtabula Application issues
- OEPA: Promulgation Reg to OEPA's continued cooperation
- Martin Marietta / Navastar: issue note to be resolved in large context; also address apparent hyperconservatism
- Rule 5??: get w/ Tim & Joan about GL water factor; hand comments quickly; find out status of Dalecki memo
10. Joan: Dale wanted Rene independent application letter to Gary Martin - stopped
11. Joe Taylor application to Cathy
12. call from Charlie Dalo - info on site specific
- $2500 per test (8440 flow thru); 4 tests required (2 chronic (site + lab H2O); 2 pH (site + lab H2O))
- Bob Spahn - Duluth
- melodies overdue for contractor
R. returned calls to RI (Tony?), Larry (Jim Brass)

13 NOV 91

1. read Ft. Standards & MRZ Policy (proposed)
2. Bob Shippen: narrative WQS
   - CA: no acute bkg. in stream <90% annual significant % of time, etc.: allows too much dilution
   - acute/chronic criterion in States: narrative/numeric - based; definitions
   - R9 writing permits based on 10% of time 100% mortality w/no LC 50 determination: don't want to stop permits unless HQ willing to back WQS disapproval
3. called Ken (Phil) Bolen at NPS (OH) about bacteria standard
4. left message for Jerry Lee / Dr. Richard Hall (David Mann out for day)
5. Discussion/disagreement w/ Rob Papa over IL WQS MZ regs
   - does (i) give them out for default mixing
   - does (ii) force permit MZ
6. meet w/ Rob, Jim H., me, Lord V. on Rule 57/ Commission/DNR regs
   - Water Resources Council Dissolved; Natural Resources Council; Authority to Director, DNR; Jurgen wants to get them WRC before dissolved - wants approval comment from USEPA
   - is there a fatal flaw in the proposed WQS, or just something that makes us suspicious
   - Now "Environmental Science Commission" is purely political: may want Advisory Committee to comment.
   - ~~FLWR~~ inputs may not be good idea
   - copies to Jim (3), Dave P., Marc T., Barry, me, Ken

14. NOV 91

1. note to Barry on MONR / 303(c)(2)(B)
2. Bob Shippen memo on MONR (dis.) approval
3. Conf. call w/ Gary Martin (Ken, Barry, me, Dave P.) (Bob Sh. by ph.)
   - Cuyahoga use designation: LRW plus VAA?; they could publish clarifying language that they are going forward & LRW applies to Chagrin
   - we want reservation removed; VAA can get here when it gets here; want schedule etc.; talk to lawyers & get back to us next week
4. Bob Shippen: PAX info. check if ok (narrative WQS implant.)
5. IL EPA MZ policy
   - Pete says immaterial issue where acute & chronic close together; other issues bigger
   - page 2, para. #1: should say more restrictive of effluent or acute; also chronic where dilution limited
   - need 40 CFR cite that effluent & water quality standards can overrule WQ criteria
   - correct of misspelling on page 2 # after (b)
   - page 3: default MZ; clarify last can't have default w/o demonstration
   - concept about chronic must be addressed for MZ for acute also overall analysis
   - p. 6: must have TRE & trigger in permits (classification)
   - p. 6: >1.0 TU/A not allowed w/o TRE (comparison)
   - also state that 1.0 TU is default; if large site eg. steel, 0.3 TU/A validation

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- p. 5. bottom: delete last 4 lines; say we expect some permits will require TC limits
- make thing written soft

15 NOV 91

1. finally send memo to Barry on Rule 57 basis for disapproval

19 NOV 91: JURY DUTY — WEEK 105

1. clear mail — 20 NOV 91
2. clear desk
3. clear phone
4. return calls
5. note on Dave's OAR letter about the Kuchtova letter
6. Ed: Pete & Rob; letter or memo or what? told Ed to write memo from him w/ position; memo from Ken to Jim Peck asking action on comments; show draft memo for comments, include those you agree with, & send these your signoff chain
7. Barry: Ken likely to oppose Rule 57 anyways; maybe we could highlight data vs. process.
8. Mark: 40 of MZ, ZPOs & WET: talk later
9. Lord Vega: Response by tomorrow to Guggio's Rule 57 submission; look over 1 page MT summary for Toxics rule
10. Lake Ontario Room: move meeting 9:00
- TR or FR work plan
- they need equipment/furniture list: typewriter, desks, etc, not phones, computers, etc.
- 10 BOA per station; 1 loop = 1 file drawer
- 02 DEC 91 next meeting

-16086 my number on flowchart

-WE is to touch base after Dec. (MO)

use permanent file guard list

11. file room meeting
- if tagged will be moved
- computer & phone by IMB
- brown box for file room (Copy shelving)
- Joan doesn't want general files in file room
- underover space in file outside of file room & personal day before & after the leigring - guidance etc. (office) to Bennett
- 1358 linear feet in permit file room (~200 linear ft after permit files)
- who gets how many file cabinets: 31 F2 binder files, 5 F3 binder files, 30 F4 lateral files, 16 F4 labeled files, 33 F4 misc/station cabinets - 1 drawer per printer (we should have (4+4) F4s in P&S)
- P&S: ~25 F2; 6 F3; 8 F4; Janet needs ~20 files; we should get ~10 files total, incl (white boxes except file room)
- boxes on the 25th; meeting by tomorrow
11. Letters on MONR Rule 57 to Dave Pingitt

21 NOV 91

1. count up file space needed: 150' for standard; talk to Mark
2. call Jerry Yaletich (Am. Brass) about Cu situation
3. Talks to Mark about MZ for desktop/full
4. Talk to Ed about PE permit review
5. Talk to Barry about MONR R57; he will present letter to Ken & force a decision
6. Jim: get legal opinion if possible
7. return phone calls
8. Jim Levy still needs stuff from OEPA Columbus on Rec. Use.

she will send [illegible]

9. Master Relation: left message (need Geo Book, CRITERIA Occ, maybe other guidance for library
10. review Cole's letter to IEPA re TRC ~~submittal~~
11. Jeff Esquino: will look over Rule 57 stuff today
12. Ray Pilger: has WQS; trial going on; FRI or next week on promulgation
13. note to draft letter (MONR) to Peter Swenson (Tom Ray); talked to Peter briefly
14. transfer WQS info to Bob Shyam
15. Frances Dalal: call tomorrow about topics
16. MONR Rule 57 file w/ 7 draft comment letters to Lord
17. Rad: RS FY91 Report to Administrator
AR no OK (Suzanne Gent); EPA no OK (Suzanne Gent)
3 WD Weekly Activity Reports
18. transfer Natl. Tox. Rule file

22 NOV 91

1. read GW Roundtable info
2. plan filing for room; look at floor plan; filing
3. meet w/ Dan Mayer about WQS program
4. note to Davenport / Roberts about files
5. file space: 86' extra for unit; library

25 NOV 91

WEEK 106

1. Amy: meet on MN
2. Amoco meeting in Joliet [IEPA: Tom McSweeney, Tim Kluge, Rick Renner] [AMOCO: Jim Bybee, Tom Starr, Bill Bruckner, Bill Wolfe, Doug Cobb, Guide (USEPA: Patty Carter, Ed, Ken, Ken (EPA), me, Jack Ravan]

- introductions, fact sheet for plant
- Environmental summary: WWTP, recent history; treatment innovations to address multi-media, efficacy, etc.; Amoco in reactor up to speed by early 1993
- NPDES permit issues: SEP 90 expiration; draft permit in OCT 90 w/ TRE; FEB 91 USEPA objection (hardnote); USEPA says 1.0 TU$_A$ end-of-pipe; Amoco says no evidence of reasonable potential to violate IL WQS; dilution may be appropriate according to Amoco; 1½
- standard inherently impossible to meet if apply of the LC$_{50}$ end-of-pipe
- want TRE + find an indicator pollutant; reopener or amendment
- IEPA: original position changed based on discussions w/ USEPA; equivalents must be in permit; MZ determination may be possible; Amoco grants that WET cause is unknown, as well as effect of anaerobic
- Amoco doesn't want to do TRE until anaerobic on line
- USEPA: 1.0 TU$_A$ at end of 3 year compliance schedule; IEPA WQS - no MZ if violations of WQS; if show non-persistent/chronic, then consider MZ information; control must be in permit
- 1.0 TU$_A$ as fallback, but not automatic; want permit condition rather than compliance schedule (see proposed language)
- not willing to sign 1.0 TU$_A$ limit (Amoco)
- IEPA will draft new language based on Amoco's if acceptable; also will address antibacksl. Rose if acceptable; also will address antibacksl.; restart advis. process; possible short term (4 year) permit

3. meet w/ Reg Pallaver & Dave L

25 NOV 91
1. Legal harassment training
2. LAN and mail training
3. pack hopes

27 NOV 91
1. pack hopes
2. conf call w/ Claudia & Chippewa Tribe on 106 grant for PCB study on 2 lakes
- will adopt Fed criteria; want to do study to figure out sources & needed controls
- need $90K; probably will get ~$60K; could shorten from 18 mo to 12 mo. going for ??
- funding to fund - will probably do that
3. meet w/ Howard Jan & Mona & FLMPO & PMS about §404 ⇔ WQS ⇔ NPS
4. through files, library files
5. help Ed w/ memo for permit objection
6. talk to Pete H. briefly about memo to permit
7. talk to Ron F. about NE Rule 57; everything up in air in NE rule, spec. order etc.; Ron told us Monk V.P.: Yes glad we didn't say go ahead; will mark up HQ form and give back

05 DEC 91 WEEK 107
1. send Ed to Groundwater meeting to talk to Bill Melnulb
2. tag hopes
3. beg mail
4. Rule 57 letter & summary back from Ron w/ attorney comments - hold off on sending anything until we understand segregation; told Barry
5. clear phone messages
- Donna Clayton about more combinations; list of people in mail
- John Steckbeck (ORC); Rule 57; left message; called back; talked over; will give close look
- Bruce Babcock: left typed w/ secretary; Big Rivers (R5 or ORSANCO), Great Lakes (GLWQA, GLNPO, Mich: R2 or R5), Numerical Discretion (Chris), Great Lakes WQS & Delineation manual (HQ), R2 (HQ)
6. Don K.: FAX from Ohio on rulemaking; must tell Ron not Promulgation ready - we will hold until after more
7. Barry Shepard: Compliance Schedule stuff: Ammonia & Metals; E-MAIL: EPA 9732; NE wants permit support documents (WI) (OH); talked at length
8. MN Conference call [Amy, Rob, Wendy Schroeder, me] [Bruce, Kimball, Gross, Anderson]
- TMDLs: mandatory BMPs?; difficult to shake down on point source off; Amy will talk to Don Lawson, Rob will tag to them at upcoming meeting
- fecal coliform: response probably near completion
- program plan: needs report by end of month; statutory to work up ??? for narrative discretion; Jan Meeting w/ Bruce Bryson (Resource Consultants)

- Gary Kimball will send in report (?): site-specific business; final coming
- info. on # of waivers in FFY 92 (generally): will send
- new MN technical document on MR by Spring; we want copy
- TMDL requirements: law suit may be coming
- 8:00 8 January 92 next call

9. distribute folks; pack lobby; pack, load, pack

04 DEC 91

1. pack boxes, move boxes, organize
2. talk to Cathy Smith (?) (260-9521) about incinerators - esp. Ohio EPA; gave Dan Bradley's name also; she will FAX summary
3. call Cathy Lemanczyk
4. read Thalle's PD + talk to Rob
5. read new lobby. info.
6. Talk to Gary Martin: Ohio folks wants to preserve Cuyahoga reservation - 190 days until final; told Dale (Chron out)
7. Dave Schaad: Indian WQS signed today; public on 10 DEC 91

05 DEC 91: GLWQI: S.C.

1. NY TMDL basin approach: deadlock (IN, OH, NY, PA, WI, MN, MI) - describe both w/ differences highlighted in the proposal; 25%-75% flow vs 100% flow for site-specific; NY ultimatum - Wit cautions to keep open mind

2. Intake Credits: National Workgroup - resolved by Kel 92 (wait and see)

3. requiring data generation when no tier 2 criteria
- change (12(a)) to require in all cases for new discharges (PA)
- I(c)(2) to allow exception when procedures met WET met and data for tier 2 not available (OH) (actually MT complained about HQ says if 2 show no impairment / does but is doubtful, then improve 3rd one, don't throw away
- I(4)+(5) say can regulate even w/o tier 2 data (if State wants) (clause in)
- the question of what is authority if permit silent, especially for the GLWQI universe of pollutants: shot down, not even in the preamble
4. site specific (MI)
5. ~~periodic review~~ periodic review of tier I + II (OH): propose mechanism in preamble
6. permeable potential (OH): detail charges

05 DEC 91

1. unpack + organize
2. Dale: will send one memo to do project on OEPA WQS issue - special focus (partly due to Gary Martin of GLWQI)
3. Talk to Jane Kelleher about GLWQI: all parts now cutting for publication
4. Ken Kramberg called - got letter, filled the other portion, doesn't know what he'll do about the one offered to me; also talked about GLWQI
5. organize unit files
6. Susan McCoy (804-527-5070): names of State WQS contacts
7. Ken Tanner: Bud Duggan wants to resubmit Rule 57 to Commissioner; we need to FAX to HQ or MO get quick opinion

09 DEC 91

Week 108

1. sort criteria & policy files
2. access LAN from Alaska; copy files (RLII)
3. clear plate
4. Cathy pack: leave message
5. FAX MI info to Marjorie Pitts (Dave Lalock & Pat Ballantine out of town)
   - also left message w/ John Stahrke (ORC)
   - Marjorie Pitts said will call (& Dave Lalock on 10)

10 DEC 91

1. filing
2. copy LAN software & modify autoexec & config files on my Robe computer
3. log through LAN info; copy files & make subdirectories
4. Per Tower: make sure we send memo to Cogen on IN AT waiver (AT justified based on WR)
   - told Bob Ranson
5. Marjorie Pitts: Bob Rhyan & Marjorie think focus of disapproval (Rule 5-) should be more than Rule 5 Subunit II does not enable protective criteria rather than focus on tapping of advisory committees; will check w/ Dalock to see if agree
6. Kelly Moore: question about American Brass & EOTA
7. Cathy Hernandez (Tetra Tech) (410-290-5921): peer review list: call back
8. John Stahrke (ORC): will talk to Eric Cohen about Rule 57 and also reorganization (NWF request)
9. Peter Swenson Dave Olsen: Sa WWPS has right to power plant & [illegible] addition

11 DEC 91

1. Per Tower: 10:00 meeting today on MI reorganization
   - also confirmed that subunit II is only part of disapproval
   - Bob still wants to find legal assurance that we can/should disapprove
   - told John Stahrke, Marc, Lydia about meeting
2. attempted to install LAN on Lydia's computer (unsuccessful)
3. reviewed Cole permit info letter to FEMA
4. attempted to print 40 CFR summary (unsuccessful)
5. Meet w/ Per Tower, Peter Swenson, Lydia Teza, John Stahrke, David Allen, Dave Ranson, Doug Olson, Pete from MI Reorganization
   - effective January 6 (Hembree)
   - Ron Waldron coordinating for Region; NWF sees as similar to threat when earlier in MT
   - Alaska Water Commission DEC/ONR dissolved; new ONR w/ most of Water Commission duties; new Lands Board
   - new ONR Director & Deputies (2)
   - Governor some public participation (Water Commission) more like other States though
   - Wetlands & NRES delegated to Natural Resources Commission & Water Commission; affects grants & processing as well.
   - Region wants to keep programs running smoothly; have to decide what happens on 9 JAN 91 - how do we keep States dedicated to our program
   - MI Dept may send opinion of effect on Water Program (Bob Reichel (permit) Program Lombardo 557-3073 - T 580; Bob Reichel; Tom Emory for Water Quality (differing #)
   - John Stahrke: we might want to issue injunction on Sec. Cohen to buy time

- Water Commission voted to not comply
- Speaker of the House filed court case
- HQ also opposed (OGC + administrator)
- may be possible to fix + adjust programs w/ problems
- if changes not significant; then delegation may not be issue; otherwise may have to redelegate
- for now: business as usual
- if MVK sues, they must deal w/ our lawyers only; probably will sue; possible solution is to agree to review delegated while programs run
- probably no WRDA comment; if passes anyways - probably partial approval or conditional approval

6. < MN meeting / printing
7. Christopher Connor (PA): environmental consultants - large clean-ups (petroleum) on the OH & MS Rivers
8. Ken Barnes: Iowa desk
9. Kristie to Peggy Pfeifer - check for O: drive
10. Call States for Brochures per request (FAX: 410-290-5285
- Illinois: Bob Maher; Clark Olsen
- Indiana: Doris Clark; Bryla Taylor
- Michigan: left message; Bill Cecil (Mark Engler)
- Ohio: left message; Ecological Assessment
- Minnesota: left message
- Wisconsin: left message; Joe Ball; John Lionberger Bureau of Ecology Resources
- Region 5: David Ahly, Wayne Davis, Tom Lisiv, Pete Kalmon (?), Jeff Taylor (?)

11. Don Mayer & env. impact statement; MN standards
12. Illinois: Ohio River Mayors - IOEM
13. more on files

MN meeting 16th
BAKER coming

12 DEC 91
1. Computer files, backup, FOUSK
2. filing + in box
3. Brenda Taylor: completely in Dark on effect of reorganization; thinks management hasn't figured out either
4. meet w/ Ken, Mark, Ed Hammer, Marcia on IL + stamp that TRC, etc.
- Deb thought he gave Jim Park extra month/trimester review: 1 year or 4 years
- week after New Years: meet 9th or so of Jan to decide which 2-4 issues most important
- Ken will talk to Ken, Barry, Dave, Mark, John C., Janet, me, Ed Dalton, Pete Peter for top 5 issues + time; will add more w/ candidate topics; meet + note; memo on decision; pursue Branch goal
5. Ray Berger: EPA wants to give NEARSO Southern & Cal heart alone WRS: coordinate w/ Bernie to come up w/ position
- told Dave P: need site-specific criteria (subcontract)
6. funded biocriteria peer review & EPA rd

13 DEC 91
1. Printer work (LAN)
2. Christmas party

17 DEC 91 — WEEK 109

1. phone messages
2. clear mail
3. file
4. Larry Bedford: no answer; Steve Bradley: Biocore station guidance - comments in, period closed, finalization imminent but not here
- Steve wants addendum for SAB to explain that 9% lipid + trophic 3 used for WL BAF, not the 8% trophic 4 used in BAF procedure for R.H.
- also recalculated Hg (mis-calculator dry to wet weight
5. TC Jane Perkins about lucore. document
6. TC Joan about 9% trophic 3 for WL + Hg speak; Joan already talked to Cynthia Holt; Joan says no fing deal since Steve giving the WC Shpeaker
7. talked to Barry about TMDL work after Rob detailed; Barry says may not be actual detach - should be able to continue TMDL work
- also, reorg not discussed yesterday; Barry will meet w/ Dale to determine what to do w/ unit chief position; will also talk to Rob
8. Talked to Amy + Lorie about segregate; Both would like to do Indian tribes (own states); Florida likes RP but maybe not about water; they will go to work group today
9. Janet Smith; returned call; damage assessment position - GS-11/12; - latest start date - moved back some 6 mo.
- possible interim location at Barrington
10. down through R8 info to HQ or prioritizing 131 Revisions
11. Jim Lucy: couldn't get through

18 DEC 91

1. Looked at Dave's NEPA-battery memo to Mike Lin
2. talked to Ed about IL issues: Janet C. backup, Lapinski Tech > WQS, reliance, NTL, WAA, + am looking into human health
3. left message for Janet Smith
4. called 3-HELP about intermittent printing
5. called Jim Lucy: couldn't get through: left message
6. file
7. call Bruce DeLelle: left message
8. Bob Shipper: left message about water Wild Rice issue always many ONRW
- talked to Dave about Little Miami golf course (State already certified under 401, but may also fall under Federal)
9. Helped Ed w/ IL letter on permit info; signed, FAXed, sent
10. Dale wants to meet on Rule 57 Lebuhn II at 3:00
- Marjorie Pitts: no answer
- Dave Lebuhn: no answer: Kathy will call
- Peter Robinson: will go ask Lebuhn (at Christmas party)
- John Stahl: Has not worked on recently, but agrees that we should not approve
- Tim Rhea: doesn't see substantial change in Georgia Pacific
- Bob Ballentine: has no problem w/ keeping NH on topics rule + fighting them; will defer either way; thought might want to consider conditional or partial approval

- prepare briefing for Dale
- Meeting: Dale, Barry, Tim, Dave Alby, Gloria
  i. Dale wants to limit case-by-case approvals to final decisions by Commission instead of recommendations by Advisory Committee; just some to agree
  ii. Dale called Paul Jagger
    - advisory committee must be unanimous
    - advising committee ~~can't~~ very limiting scope
    - currently DOI is advisory committee for 2 things
    - U.S. ECOS is not cut out of review
    - subsule II doesn't add anything new; staff can already make same basic type decisions as subsule II; no new flexibility in subsule (II)
  iii. Dale says we can't reverse ~~our~~ support of Rule 5 regardless of CWA, ESCFA, guidance (must interpret statutes)

19 DEC 91

1. New Rule 57 letter for Dale.
- Dale already wrote one + signed for Jagger
- only assurance that subsule (II) doesn't undercut range of flexibility & does not reduce our review authority (but we probably already have lost sufficient authority)
- bottom line: Dale overruled WRS, Permits, ORC + HQ support in deference to Jagger + previous promises
- talked to Dave R; Tim Barry; Barry DeBuhr
- Tim H. says Dale keeps caving in w/o warning
- Barry D. says we have to fix historical root problem
- I say that WRS compromised by unreasonable deference to Paul Jagger, Jim Parks, + worries about OWRI concurrence

2. left message for Bob Skipper about Wild + Scenic ?:? ONRW
3. BAKER X2
4. filing
5. Jan Lucy: not in
6. Bianca DeSalle: not in
7. BIRD X2
8. RESPITE X2

Janet Smith
Jo 3765

20 DEC 91

1. Gloria out
2. H2OBIRD
3. Ken Stromberg: deal w/ Janet + Jackie: end of March reporting date: OPM won't buy Madison duty stations (probably not Barrington); official Green Bay station now/move to Madison + back
4. talk w/ Amy about MN cases + E. coli.
5. talk to Ed about FL cases + guidance for Conner, Ed.
6. Meet w/ Margaret, Rob, Jeff, Bruce, Jon or modeling position
7. Jean mail
8. Rifle
9. MMMM
10. Breakfast: American

Karen Olson

11. Meet w/ Barry + Marc Tuckman + Rob Boyer
- 3 month detail for Rob to OWRI
+ also must assure stop work on SAB + Tenure draft; reduce to essential; WRS Coordinate primary responsibility
- Jan 15, 1991: 20 page draft on what the OWRI is. Tenure draft will print 500 copies w/ 1 month of that; buy ourselves; possibly + a form; lease or lease/buy; afford

materials from Joan; also Layne's document for admits

12. Bragg
13. talks to Joan: ~20 page ELWRI summary for public by Jan. 15, 1992; work w/ Terese Hunt (Harvey Olson)
14. talks to Dave Rankin: 20 page product; process of informing & briefing SAB; also wants to involve me in ELWRI (?) w/ Canada

WEEK 110

23 DEC 91

1. Log through ELWRI materials from Joan
2. Joe Ball (WORK) called about Lucerne Dam
3. Talk to Dave P. about keeping issues going
4. draft FL NRC memo to Ken Farrar; finalize & give to Ed for signing
5. MF reorganization meeting (Bob Swenson, Dave Rankin, Matt Blackman, Chuck Berry)
- Brand response too control or reorganization (Westfall & NWF)
- conflict of interest provision; substantial change for re-delegation: need to lg addressed
- lets for July response (went out)
- guidance from ORC on what is substantial
- mid January need to have something
- Bob Swenson taking lead; memo to Peter (affect of reorg.)
- may affect WRS (everything is delegated) (I don't think it does apply to WRS)

23 DEC 91 VACATION

30 DEC 91 VACATION

WEEK 111

WEEK 112

WEEK 113

06 JAN 92

1. clear phone
2. clear mail
3. talks w/ Wayne Davis & Dave P. about independent appraisal
4. Conf call w/ Mark Van Pelt, Jim Fagan, Dale Bryson
- conflict for 2:00 (Dale & Ken); call Dale in 5 minutes
- MVP meeting w/ Lucerne; Wilder tomorrow to move ELWRI forward; will reaffirm Fair/Reilly timelines same meeting
- MONR WRS: Commissioners; 4-2 vote to go forward, NWF says adv. committee expands review authority; how does adv. committee fit w/ new Congress committees; redundant; Governor may not be aware; State should not go forward since committee approving will not be around
- NWF sent letter to Committee for hearings; private meeting communications for adv. committee
- Reorganization postponed to Feb. effective date
- spoke w/ Ken afterwards
- 5 copies of WRS (R5) to Joan Duffin (Hagerman 6-3007) for copies
- get Harvey Olson # from Joan K.

- OVER