

## Hit list for Regulation Changes as discussed on 11/9/2015

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Attendees: Michelle Hunter, Kurt Vollbrecht, Ali Furrall, Greg Huey, Steve Huddleson, Nancy McDuffy, Kate Herrell

1. Streamline PN-1 Process – last revised in 2006 to incorporate 2 PN periods. Discuss with Loch and Andri current requirements are on NMED side and figure how to further reduce those efforts?
2. Updating WQCC Standards: As and TCE – lower; FE, MG – increase?. Provide a grace period for those sites currently in abatement to achieve new standards (2 years?). Discuss with Dennis McQuillin how this was approached for Ur in 2006..... Compare constituents regulated under PSTB to what is regulated under WQCC – should be comprehensive for both. Compare Department, WQCC, PSTB, and MCLS
3. Add Vapor language into abatement regulations (4000 series). Review the timing structure for completing Stage 1 and entering into Stage 2 (only currently have 120 days in-between and this is not enough time). Review difference between the Department TI waiver and the AAS - these should be more similar than different. Also look at institutional controls and how they play into these 2 items.
4. Can we suspend a DP for a certain length of time? (Statue change) - probably cannot address at this time...
5. Can we make a simple renewal if nothing changes – just a formal letter indicating such instead of reapplying? This would be particularly helpful for municipalities WWTFs that rarely change. Use current copper ruling for amendments to incorporate language by defining an amendment as a volume change only of less than 10%. If over 10% then it is considered a modification!
6. Beneficial re-use of Domestic WW – provide rule change and set appropriate standards for Domestic WW re-use only. For all other (ASR, Industrial) incorporate language of "Enforceable guidance" - look at current language used in the Mining Act (MMD) and FA – and have guidance updated every 5 years or so.
7. VRP – have department regs – are easier to change than WQCC regs. VRP PN – cannot be 1 piece of paper that is 1000 dollars! Look at website, e-mail?
8. Financial Assurance rules – look at other States for guidance?
9. Variances – remove the 5 year period of approval for variances – make then the life of the facility upon approval by the Department. Review them internally every 5 years. See Copper rule for language.
10. Abatement Plan/Appeal Process – talk to Ali about current issues with these rules. And Justin Ball.