
From: Jonas, Jill D - DNR <Jill.Jonas@Wisconsin.gov>
Sent: Monday, January 10, 2011 1:32 PM
To: Mike Baker; Beth Messer; Howard, Brock (DEQ); Monosmith, Carrie (DEQ); Eric.Portz@illinois.gov; Kirk Leifheit; Boushon, Lee H - DNR; PAT CARROLL; Ellingboe, Randy (MDH); Overmyer, Rich (DNRE); Benzie, Richard (DEQ); rick.cobb@illinois.gov; Smude, Robert (MDH); Jonas, Jill D - DNR
Subject: FW: Final draft DW Administrators letter to EPA
Attachments: Region 5 comments 01 08_final draft.DOC

Thank you Jerry,

I've included a handful of "clean-up" suggestions in "tracked" changes. Additionally, I'm confused with the 2nd sentence of our second paragraph. I'm not sure when we mean NCWS and TNCWS. Jerry, could you take a look at it?

To answer Jerry's questions:

1. I lean toward a conference call; or perhaps someone wants to come to our spring Chicago Region V meeting and talk with us???
2. I suggest we send a copy to ASDWA once signed. I'm sure it will come up during the Board meeting, however I'm willing to request the discussion if people prefer.

Jill

Jill D. Jonas, Director
 Bureau of Drinking Water and Groundwater
 Wisconsin Department of Natural Resources
 101 South Webster, PO Box 7921
 Madison, WI 53707-7921
 phone: (608) 267-7545
 fax: (608) 267-7650
 jill.jonas@wisconsin.gov

From: Smith, Gerald (MDH) [mailto:Gerald.Smith@state.mn.us]
Sent: Saturday, January 08, 2011 1:04 PM
To: Jonas, Jill D - DNR; Mike Baker; Beth Messer; Brock (DNRE) Howard; Carrie (DNRE) Monosmith; Eric.Portz@illinois.gov; Kirk Leifheit; Boushon, Lee H - DNR; PAT CARROLL; Ellingboe, Randy (MDH); Rich (DNRE) Overmyer; Richard (DNRE) Benzie; rick.cobb@illinois.gov; Smude, Robert (MDH)
Subject: RE: Final draft DW Administrators letter to EPA

Hello all

The document has been revised to address the consistency issues of the acronyms. We will go without the letterhead as there are states where the logo may be changing. In the final document we will try to have all of the signatures on a single page. Please review your signature block to make sure it is correct. (I just want to make sure something has not been lost in the cut and paste). The final paragraph has been edited to include a contact for the Region 5 states. There is general agreement that the letter can now be sent to Region 5 staff. If I hear no objections I will send a copy of the draft (minus signatures) to Miguel Wednesday.

When you send me your signature block I will use this as your stamp of approval the document is ready to sign. I have a signature block from Illinois.

Two additional questions

1 Do we want to request a meeting with Tom Grubbs to further discuss these issues? We did make that request when a common letter signed by all Region 5 State's was sent for the proposed GWR. This resulted US EPA holding a two day meeting in DC to discuss the States issues. Almost all states had representation at the meeting.

2. Do we brief ASDWA on our request? If so when? The March ASDWA meeting (general session and Board meeting) will be a good time to get everyone at the table.

Thanks

Jerry

From: Jonas, Jill D - DNR [mailto:Jill.Jonas@Wisconsin.gov]

Sent: Friday, January 07, 2011 7:52 AM

To: Mike Baker; Beth Messer; Brock (DNRE) Howard; Carrie (DNRE) Monosmith; Eric.Portz@illinois.gov; Smith, Gerald (MDH); Kirk Leifheit; Boushon, Lee H - DNR; PAT CARROLL; Ellingboe, Randy (MDH); Rich (DNRE) Overmyer; Richard (DNRE) Benzie; rick.cobb@illinois.gov; Smude, Robert (MDH)

Subject: RE: Final draft DW Administrators letter to EPA

Morning All,

I originally replied only to Jerry so thought I should share my thoughts. I suggested we clean up the acronym "stuff" so it was consistent throughout the document.

Other comments:

I support having a contact (and it being Pat----Thanks).

Electronic signature (pdf) is okay with me.

We also have a letterhead change going on---so I'm in the same boat as Mike on that one.

Once we finalize---okay to give it to the Region.

Jill D. Jonas, Director
Bureau of Drinking Water and Groundwater
Wisconsin Department of Natural Resources
101 South Webster, PO Box 7921
Madison, WI 53707-7921
phone: (608) 267-7545
fax: (608) 267-7650
jill.jonas@wisconsin.gov

From: Mike Baker [mailto:Mike.Baker@epa.state.oh.us]

Sent: Friday, January 07, 2011 7:39 AM

To: Beth Messer; Brock (DNRE) Howard; Carrie (DNRE) Monosmith; Eric.Portz@illinois.gov; Gerald (MDH)' Smith; Jonas, Jill D - DNR; Kirk Leifheit; Boushon, Lee H - DNR; PAT CARROLL; Randy (MDH) Ellingboe; Rich (DNRE) Overmyer; Richard (DNRE) Benzie; rick.cobb@illinois.gov; Robert (MDH) Smude

Subject: RE: FInal draft DW Administrators letter to EPA

I agree having a contact is a good idea and thanks Pat for volunteering.

Clarification, are we using electronic signatures or are we circulating the letter. Electronic signatures (i.e. pdf) would clearly be quicker.

It is a little tough to provide the Ohio EPA letterhead right now as we are changing Governor and Director over the weekend.

Mike

>>> "CARROLL, PAT" <PCARROLL@idem.IN.gov> 1/7/2011 7:48 AM >>>

Jerry,

Thanks again for pulling this final together. Indiana is OK with sending this version. I have one suggestion for the last paragraph: should we put in a contact in case EPA wants clarification of one or more of our points? Since I bought it up, I'll volunteer to be a contact and would work with all of you to answer any question EPA may have. I'm also open on this and will go along with what we all decide on a inserting a contact.

I'm OK either way on letterhead: blank or the collective logos. I'll send our logo if we decide to go that way.

I'd vote for some sort of electronic signature, but will go along with what the group decides.

As soon as we all approve of the final, we should give it to Region 5

My signature block is:

Patrick Carroll, Chief
Drinking Water Branch
Office of Water Quality
Indiana Department of Environmental Management

Pat

From: Smith, Gerald (MDH) [mailto:Gerald.Smith@state.mn.us]

Sent: Wednesday, January 05, 2011 10:22 AM

To: Jonas, Jill D - DNR; Beth Messer; Kirk Leifheit; Mike Baker; CARROLL, PAT; 'Eric.Portz@illinois.gov'; 'rick.cobb@illinois.gov'; Richard (DNRE) Benzie; Brock (DNRE) Howard; Carrie (DNRE) Monosmith; Rich (DNRE) Overmyer; Ellingboe, Randy (MDH); Smude, Robert (MDH); Boushon, Lee H - DNR

Subject: FInal draft DW Administrators letter to EPA

Importance: High

Good morning all

Attached is the final draft (yeah and a toss of confetti). The letter still needs formatting and that task has been given to our support staff. The track change is still on in case there are still changes to be made. Can everyone please send me their signature block. If you have already done so can you please resend as a couple of my archive email files were lost and I have someone trying to recover them. It will be faster if you resend the signature block.

Do we want the letter to go out with out a letterhead? One option would be to paste the logo from each state at the top of the letter.

Do the directors want to route the letter for signature or use electronic signatures?

Are we okay to send an advance copy of the letter to Region 5?

Thanks

Jerry

From: Jonas, Jill D - DNR [mailto:Jill.Jonas@Wisconsin.gov]

Sent: Monday, January 03, 2011 1:16 PM

To: Smith, Gerald (MDH); Beth Messer; Kirk Leifheit; Mike Baker; 'pcarroll@idem.in.gov'; 'Eric.Portz@illinois.gov'; 'rick.cobb@illinois.gov'; Richard (DNRE) Benzie; Brock (DNRE) Howard; Carrie (DNRE) Monosmith; Rich (DNRE) Overmyer; Ellingboe, Randy (MDH); Smude, Robert (MDH); Boushon, Lee H - DNR

Subject: RE: Recap REduxp

Hi All,

Yes, we are okay with dropping the 2nd sentence in #2 as suggested by Beth.

Looking forward to seeing the final draft.

Happy 2011 everyone.

Jill

Jill D. Jonas, Director
Bureau of Drinking Water and Groundwater
Wisconsin Department of Natural Resources
101 South Webster, PO Box 7921
Madison, WI 53707-7921
phone: (608) 267-7545
fax: (608) 267-7650
jill.jonas@wisconsin.gov

From: Smith, Gerald (MDH) [mailto:Gerald.Smith@state.mn.us]

Sent: Sunday, January 02, 2011 12:43 PM

To: Beth Messer; Kirk Leifheit; Mike Baker; 'pcarroll@idem.in.gov'; 'Eric.Portz@illinois.gov'; 'rick.cobb@illinois.gov'; Richard (DNRE) Benzie; Brock (DNRE) Howard; Carrie (DNRE) Monosmith; Rich (DNRE) Overmyer; Ellingboe, Randy (MDH); Smude, Robert (MDH); Jonas, Jill D - DNR; Boushon, Lee H - DNR

Subject: RE: Recap REduxp

Happy New everyone

I have changed the letter to incorporate Beth's comment in paragraph 3.

Regarding the Section 2 comment, I need to defer to Jill and Lee as this was language from their December 15 and 16 email attachments. I am good with dropping from the second bullet "What is needed is a compliance response path for total coliform positives that focuses on GWR responses for the initial confirmed total coliform positive and has an escalated response for additional confirmed total coliform positive results" Jill/Lee are you okay with dropping this sentence? If not can you please address Beth/Mike's questions.

I suggest keeping "state actions" in the first bullet under Section 2.

I had not thought about this until Jill sent me her electronic signature, I am wondering do all the drinking water administrators want to sign the letter electronically or route the letter and sign?

If there are no further comments I will send the final draft to everyone Wednesday for one last review and okay.

Thanks

Jerry

From: Beth Messer [mailto:Beth.Messer@epa.state.oh.us]
Sent: Wednesday, December 29, 2010 7:31 AM
To: Kirk Leifheit; Mike Baker; 'pcarroll@idem.in.gov'; 'Eric.Portz@illinois.gov'; 'rick.cobb@illinois.gov'; Richard (DNRE) Benzie; Brock (DNRE) Howard; Carrie (DNRE) Monosmith; Rich (DNRE) Overmyer; Smith, Gerald (MDH); Ellingboe, Randy (MDH); Smude, Robert (MDH); Jill D - DNR Jonas; Lee H - DNR Boushon
Subject: RE: Recap - MI Comments

Hey All,
Mike is out this week, but I got his input on this via email and I've combined our comments. The comments are tracked in the attached. The first comment in paragraph 3 is pretty straightforward.

The other comments are in Section #2. We weren't sure what it was trying to say. I think if you remove the sentences, it still gets the point across. Also in the first bullet under #2, we don't think it needs to refer to state actions again since it's in the above paragraph.

Mike would like to see the final version before sign off.

Thanks,
Beth

>>> "Overmyer, Rich (DNRE)" <OVERMYERR@michigan.gov> 12/27/2010 3:26 PM >>>

All,

Yes, thanks to everyone for their work on this especially Jerry & Beth. Pat's last draft to Mikes revision looks good. Just note we should be consistent in the "1000 or less" population cutoff (eliminate

the "less than 1000"). Also the 3rd bullet under item 4 should be:
Maintain baseline monitoring as quarterly for all *groundwater systems serving 1000 or less*. (Not all pws).

1. Is this a draft that we can now share with the Region? YES
2. Is this proposal all or nothing? What happens if US EPA is okay with the simplified monitoring process but does not consider dropping the monitoring and reporting from clean compliance history? **NO, NOT ALL OR NOTHING BEING ABLE TO KEEP OUR FIND & FIX PROCESS IS VERY IMPORTANT. HOWEVER, MI ESTIMATES A 60-70% VIOLATION RATE IF MONTHLY MONITORING STAYS IN AS PROPOSED. I SUSPECT THAT WOULD MEAN MASS REFERRALS TO EPA FOR ENFORCEMENT OF MOST M&R VIOLATIONS.**
3. By using "significant deficiency" as part of reduced monitoring are we saying it is not necessary to define "sanitary defect"? **WE DON'T NEED ANOTHER DEFINITION.**
4. Is it okay to drop the following in #2? "Failure to follow Ground Water Rule would trigger a RTCR Level 1 Assessment. A second Level 1 trigger within a rolling 12-month period would trigger Level 1 Assessment and a third Level1 trigger would require a Level 2 assessment" If not, I need clarification of what is meant by failure to follow GWR? **MIKES VERSION WORKS.**
5. Do we need to provide comments or proposed definition of season system, clean compliance history, sanitary defect? **NO, NOT AT THIS STAGE. LET'S NOT MAKE THIS OVERLY DETAILED.**
6. Is it possible to open up the reduced monitoring to NTNCWS as well as TNCWS? The reason I ask is based on my conversation last week with Miguel. In this case we may be able to get a little more. It is still possible that through the rule negotiations that we may need settle for only transient noncommunity systems. Miguel just needs to know our initial and fall back positions. **MI HAS ALMOST 1500 NT'S BUT IT IS DIFFICULT FOR US TO ARGUE VERY CONVINCINGLY TO JUSTIFY ANNUAL COLIFORM MONITORING FOR THEM. WE UNDERSTAND IT'S A LITTLE DIFFERENT FOR MN'S PROGRAM THAT IS SET UP BASED ON ANNUAL SITE VISITS & MONITORING FOR THE SYSTEMS. OUR TAKE ON THIS IS MONTHLY MONITORING IS NOT AN EFFICIENT USE OF SCARCE PUBLIC HEALTH RESOURCES. IF WE NEED TO CONCEDE ANNUAL MONITORING FOR NT'S TO MAKE MONTHLY FOR EVERYONE GO AWAY, WE SHOULD. PUTTING IT ON THE TABLE NOW AND BEING FIRM ON IT WOULD BE MI'S VOTE.**

Happy New Year!

Rich

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