

Summary of Comments
by Commission Advisory Committees and the Technical Committee
to the Commission's Ad Hoc Committee on Water Quality Standards
Implementation Request for Input
Dated July 18, 2017

Comments from the Chemical Industry Advisory Committee

These comments are filed on behalf of the chemical and manufacturing industries that are members of ORSANCO's Chemical Industry Advisory Committee ("the Committee") in response to the July 18, 2017 memorandum circulated for internal dialogue concerning 5 alternatives addressing ORSANCO's Pollution Control Standards (PCS) Program that is currently subject of the triennial review. The Committee is very pleased to have the opportunity to provide input to ORSANCO on this very important issue and to have the opportunity to work with the Commission as it not only addresses its regulatory program, but also as it carries out its broader mission of assessing and protecting the Ohio River as a critical recreation, water supply, aquatic habitat and transportation resource for the entire region. OSANCO has played an important role in facilitating the refinement of knowledge, technology and science relative to the Ohio River.

The chemical and manufacturing industries along the Ohio River and its watersheds are actively engaged in implementation of federal and state environmental regulatory programs derived and informed by the federal Clean Water Act, Clean Air Act, Solid Waste Disposal Act, Endangered Species Act, Safe Drinking Water Act, Comprehensive Environmental Response, Compensation and Liability Act, etc. In 2017, the technology and science that underlies the key environmental regulatory programs upon which both the chemical and manufacturing industries rely when developing operating programs represents state-of-the-art environmental policy.

The 1948 Compact provides, "the guiding principle of this Compact shall be that pollution by sewage or industrial wastes originating within a signatory state shall not injuriously affect the various uses of the interstate waters..." Since the creation of the Compact, history records extensive and comprehensive development of the federal and state partnership of today's federally-delegated environmental programs and state-developed environmental policy. These programs have been demonstrated to be very effective in not only addressing the nation's rivers as an aquatic habitat but also assuring that these rivers are well suited for recreation and public drinking water supply. This result has certainly been demonstrated for the Ohio River where every state bordering the river is currently implementing effective water quality programs that have been approved by the United States Environmental Protection Agency under the federal Clean Water Act. While ORSANCO continues to be uniquely situated to address many issues related to the Ohio River, its Pollution Control Standards have been eclipsed by these federal and state programs, rendering ORSANCO's current efforts to mirror federal/state water quality standards implementation duplicative and in some instances confusing for the member states and the regulated community. The result is increased burden on the regulated community with little or no added value.

The Committee finds ORSANCO's greatest value to be centered around its unique scientific and technical research, its coordinating role with states and stakeholders, and its Organic Detection System (ODS). The significance of the ODS was most recently demonstrated in managing the inadvertent release of MCHM to the Elk River, Kanawha River, Ohio River and beyond. The Committee shares the commitment of ORSANCO to monitor and protect the Ohio River and its watersheds. The results of ORSANCO's work on the MCHM spill resulted in key information needed by the public and private sectors in designing an appropriate response. ORSANCO's work resulted in the ability of everyone to commit response based on knowledge and data. ORSANCO's investment saved the Ohio River community significant resources. ORSANCO is uniquely positioned to lead all states with its data and capabilities

The Committee welcomes the work of the Ad Hoc Committee on Water Quality Standards Implementation relative to ORSANCO's future role in developing and implementing Water Quality Standards for the Ohio River. ORSANCO, like any viable organization, must actively engage in an assessment of its programs as its membership, state and federal partners also manage evolving environmental science and policy. The Alternatives presented in the July 18, 2017 memorandum are reflective of thoughtful review of ORSANCO as it looks to the future and its positive impact on the Ohio River.

The report that the majority of the Commissioners believe that "Alternative #2" merits additional review by the Commission provides important insight into ORSANCO's future and its interest in complementing today's federal and state environmental policies and programs. The Committee applauds the Commissioner's work and preliminary conclusions. As stated in Alternative #2: "In recognition of the successes of the federal Clean Water Act and the related state water pollution control programs of member states, the Pollution Control Standards (PCS) should be revised by adding a provision that recognizes that water quality standards and criteria, as well as mixing zone requirements, and other provisions of the PCS are being adequately addressed by member states in accordance with programs appropriate for implementation of the federal Clean Water Act. To the extent that all member states are operating under such programs, the Commission may conclude that it need not continue with triennial review process related to water quality criteria (and related provisions) of the PCS."

The Committee supports Alternative #2 as indicia of ORSANCO's commitment to maintaining the proactive posture that is well documented in its near 70 year history. The Committee agrees with the conclusion that member states are mandated by the federal Clean Water Act to adopt and submit for USEPA approval a program that addresses designated uses, free from mandates, wastewater discharge requirements, water quality standards, mixing zones, and more. The Committee joins in the conclusion that the requirements of the Compact are being satisfied by the federal Clean Water Act.

The Committee is comprised of businesses that carry names of existing and new entities, all of which have entertained the very questions ORSANCO is analyzing. Maintaining a strong and value-added mission protects an organization so that it may continue to lead the next generation. ORSANCO should be comforted by the fact that federal and state regulatory programs have demonstrated their effectiveness in protecting the river for use by the public and as a habitat for aquatic life. Rather than duplicate these federal and state programs, ORSANCO should redirect its unique talents and resources to support its program elements for which there is no duplication: the assessment of water quality and biological integrity of the river, public out-reach, spill detection and response, etc. The Committee stands ready to support the Commission and ORSANCO staff in advancing these customized skills for the benefit of the Ohio River, as the Compact defines. The Committee strongly supports a future ORSANCO as described by Alternative #2 and will assist in seeking appropriate public and private resources to secure the mission to protect the Ohio River.

The Committee has read with interest all of the Alternatives. Alternative #1 proposing to eliminate entirely the PCS program represents what likely will be the final conclusion reached in Alternative #2. Alternative #2 allows for a more public and thoughtful review of state programs relative to the PCS. Alternatives #3 and #4 represent a very resource-intensive administrative and regulatory process for ORSANCO, which does nothing more than to duplicate the existing federal and state programs that serve well to protect human health and the environment. The Committee questions the value of Alternative #5 which sets a path for ORSANCO to hold on to the PCS, while making it a guidance or recommended program.

In conclusion, the Committee favors Alternative #2 and encourages the Commissioners to implement its stated goal. The Committee greatly appreciates the opportunity to provide comment.

Comments from the Power Industry Advisory Committee

These comments are provided by the ORSANCO Power Industry Advisory Committee (PIAC) concerning proposed alternatives as to how ORSANCO implements the existing Pollution Control Standards (PCS), as delineated in the July 18, 2017 white paper. We appreciate the time and resources that the Ad Hoc Committee has taken to develop the five proposed alternatives. Good water quality in the Ohio River benefits everyone, and the significant chemical and biological monitoring programs conducted by ORSANCO staff have clearly shown improved water quality. In addition, several companies of the PIAC have contributed meaningful funding to ecological assessments of the Ohio River near coal-fired generating facilities for over 30 years via the Ohio River Ecological Research Program. These studies, like the ORSANCO data, have demonstrated improved water quality since the early 1970s.

With the advent of potential lowered funding to ORSANCO (and also to states) from the federal government, the decision to re-think the function of the PCS is timely. Notwithstanding the fact that the ORSANCO Compact does not directly address the derivation and implementation of water quality standards (WQS), ORSANCO's greatest contribution for all stakeholders is the collection and issuance of high-quality monitoring results. Many PIAC companies have accessed these data to support environmental permitting/relicensing activities.

As to the alternatives outlined in the white paper, the PIAC can support alternatives 1, 2, or 5. Alternative 2 would be our preference. One of the reasons we believe that ORSANCO should not assume the review of WQS during its triennial reviews is that the Commission has no mechanism for due process (i.e., affected parties cannot file legal challenges to updated or new standards). This is a critical aspect when states propose new environmental regulations or standards. Moreover, the effort that ORSANCO staff put toward the triennial review process is not cost-effective as some member states, themselves, do not adopt the updated PCS in their own standards. The PIAC thinks ORSANCO would be better served reallocating the limited resources to programs supporting data collection on the Ohio River. As each member state has the authority to implement the Clean Water Act, the added value of the states working with ORSANCO during the triennial review process is highly speculative. ORSANCO could still serve in an advisory role should the state need assistance in the development of their WQS. This is not to say that the PCS are outdated or irrelevant; as an example, ORSANCO is one of only a few water resource regulatory bodies that has adopted US EPA's methylmercury fish tissue criterion. The PIAC supports ORSANCO's usage of a weight-of-evidence approach to assess the fish consumption use, and we support the continued use of this for 305(b) reporting purposes.

The electric utility industry is a highly regulated sector. Significant investments have been made by PIAC member companies to reduce air emissions, minimize solid waste releases, and improve the quality of process waste streams. The footprint of coal-based power production on the Ohio River is considerably less than 10 years ago. For those facilities that have installed state-of-the-art pollution control technologies to comply with applicable federal or state regulations (allowing them to continue to use coal as a fuel), the development of reasonable, scientifically-based environmental standards is essential.

Lastly, the Utilities would like to bring attention to some statements made concerning Alternative 3. Under the "Key Considerations", item #6 states that one of the advantages of this alternative would be to "Reduce the influence of campaign donors and special interest groups on the standards development and permitting processes." One of the disadvantages (cons) listed, as item #1, is that the alternative may be "Opposed by some industries and the chamber of commerce who object to any regulations, even the ones that may help them." We consider these statements irrelevant, without basis, and inflammatory. Over the years the PIAC and other industry advisory committees have worked constructively with ORSANCO and member states to develop standards and policies that are reasonable and technically sound.

The PIAC appreciates the opportunity to submit these comments.

Comments from the Public Information Advisory Committee

The Public Information Advisory Committee (PIACO) met by conference call on August 17. The committee expressed its appreciation regarding bringing these alternatives and the discussion to ORSANCO's committee prior to making any decision about the next triennial review. PIACO, overwhelmingly, selected Alternative #4.

The committee believes that Alternative #4 strengthens ORSANCO's leadership role in the basin in bringing states together to address any differences in water quality standards. The committee believes this Alternative also strengthens ORSANCO's fundraising abilities in the watershed.

However, most importantly, PIACO feels that Alternative #4 enhances ORSANCO's role in protecting the Ohio River and bringing people together for a shared vision of a cleaner, healthier river.

PIACO's biggest concern about Alternative #2 is a potential backlash among the river committee that could present negative publicity for ORSANCO in the media. The committee felt the areas that would cause this negativity include a potential loss of standards and ORSANCO's role in the watershed protection standards.

Finally, in reading the minority report for Alternative #2, it is apparent that at least some of the Commissioners felt very strongly that Alternative #2 was not an appropriate approach for ORSANCO.

Comments from the POTW Advisory Committee

Comments were received from three representatives of the POTW Advisory Committee which are summarized as follows:

Comment: While keeping in mind that this is still a preliminary internal discussion and thus I reserve the right to change my opinion, I agree with the Commission and believe further consideration of Alternative 2 is appropriate. To the extent that all member states are implementing approved programs under the federal Clean Water Act, there would be little or no purpose for the Commission to continue the process for updating the PCS in its current form. I believe the requirements of the Compact are being satisfied by member state programs implementing the federal Clean Water Act.

Comment: The materials supplied by the Commission indicate the majorities' concern with the duplication of efforts with the states with regards to water quality standards implementation. During this time of "stressed" budgets and limited resources, duplication of efforts is definitely a major concern of many organizations at all levels of government (federal, state and local), as well as the public (tax/rate payers) that we serve. Under any future scenario that minimizes PCS activities, it will be important for ORSANCO to continue to provide a forum to discuss water quality standards and to promote consistency among the states to ensure the protection of the Ohio River as a shared resource.

Comment: Alternatives #1 and #2 both refer to redirecting funding from PCS to other important activities such as, monitoring/assessments, spill detection, and public outreach. However, it is not clear from the documentation as to whether minimizing PCS activities will effect funding from US EPA or the states.

Comment: Recognizing that ORSANCO was first formed around the time of the first Federal Water Pollution Control Act and years before the USEPA was established, it provided a unique service in monitoring water quality in the Ohio River and approving treatment standards. The federal Clean Water Act now mandates that the individual states adopt these standards in their EPA approved programs which calls into question the need for ORSANCO to continue its PCS program.

Comment: There is value in ORSANCO continuing the PCS program at some level. While the individual state programs have provided improvements in water quality, there is great value in having an entity such as ORSANCO looking at the entire Ohio River basin and evaluating the overall health of the system. There are emerging contaminants that are just now being measured and recognized as potential threats to our water systems. These contaminants, while being studied and evaluated as individual constituents, are better evaluated as an impact to a larger ecosystem. An entity such as ORSANCO can provide input without being influenced by the politics of individual state governments and across various EPA regions.

Comment: Recommend continuing with a program that would be consistent with and protect the USEPA 106 grant. However, the triennial review time (every three years) is too frequent. A PCS review completed every five or six years with more input from ORSANCO committees on the constituents analyzed is recommended. This will more closely align with the five year time frame for NPDES permits that are issued by the states.

Comments from the Technical Committee

Comments were received from two states and one federal agency as summarized below:

Comment: If water quality standards are eliminated from the Pollution Control Standards program, then how will ORSANCO complete a 305(b) assessment for the Ohio River? Is there an obligation for ORSANCO to complete a 305(b) assessment in the federal 106 grant.

Comment: What are the benefits of having the same water quality standards across all states outlined in the Compact when the Compact itself recognizes the vast differences between the states? Despite water quality standards being a part of the Pollution Control Standards to date, in practice, some states have been using their water quality standards for 305(b) reporting and permitting.

Comment: The Clean Water Act defines a clear and transparent process for water quality standard development. Can ORSANCO meet this same level of transparency in water quality standard development when EPA review or consultation with the USFWS is not required?

Comment: It would be helpful if the Commission developed a set of review criteria to consistently evaluate each alternative and identified which criteria are most important in driving the selection of the preferred alternative. Some criteria suggestions based on the package include:

- a. maximizes consistency among states;
- b. maximizes protection of aquatic life and human health and associated designated uses;
- c. minimizes redundancy/duplication of water quality criteria and standards efforts of the Compact States and EPA;
- d. fills in gaps that exist even with existing state and EPA criteria/WQS programs;
- e. maximizes the use of ORSANCO staff time and financial resources;
- f. meets CWA and federal regulatory requirements; and
- g. meets Compact States' regulatory requirements.

Comment: One alternative that didn't appear to be discussed is for ORSANCO to fill a WQS niche that isn't currently filled by EPA or the States by generating criteria that haven't been published by EPA or updated recently by EPA. Examples could include numeric biological criteria, numeric nutrient criteria, conductivity, and sulfate.

Comment: Water Quality Standards (WQS) are the basis for a wide range of programs under the Clean Water Act. ORSANCO PCS include designated uses, water quality criteria, and implementation procedures that apply to the main stem of the Ohio River. The 1948 ORSANCO Compact predates the 1972 Clean Water Act (CWA), with its water pollution control strategies, including its mandate to develop national recommended water quality criteria for the protection of aquatic life and human health, and implementation procedures for dischargers. ORSANCO's PCS for the River have evolved (WQS Alternative 2, Expanded) from narrative criteria and sanitary treatment standards to include numeric criteria and implementation procedures that reflect the latest science for protecting designated uses of the entirety of Ohio River surface water. WQS Alternative 1 and WQS Alternative 2 reverse that evolution of scientific progress.

Comment: Several WQS Alternatives (WQS Alternatives 3, 4, and 5) and the Minority Review of Expanded WQS Alternative 2 report discrepancies between Compact state water quality criteria adoption and implementation. For example, there are at least 188 parameters among the six signatory states and EPA for which ORSANCO has criteria and the state or EPA does not; stringency of criteria are not consistent; mixing zones prohibitions and anti-degradation policies are inconsistently applied. Therefore, it is not clear why the ORSANCO PCS are "redundant" (WQS Alternative 2, page 2). To provide clarity regarding the differences/redundancy between ORSANCO PCS and member state WQS, the Ad Hoc Committee should consider creating a tabular representation of Compact state numeric criteria and implementation procedures that WQS Alternative 2, their preferred alternative, proposes to eliminate.

Comment: WQS Alternative 2 and WQS Alternative 3 mention potential cost savings to ORSANCO but do not provide details. Alternative 2 states that updating the PCS results in “unnecessarily expending limited resources on a redundant program at a time when other programs are in dire needs of those funds.” If cost savings are a consideration for decision making, a cost benefit analysis of each alternative is warranted to determine the best approach to achieve benefits while preserving savings. If a WQS Alternative could result in a potential funding loss or gain, this should be factored into the analysis.

Comment: The report states that if the Commission decides at the Fall 2017 ORSANCO meeting to proceed with any of the WQS Alternative proposals, that the Pollution Control Standards Committee will be requested to advance these proposals through the next triennial review process. In addition to soliciting input from the TEC, the Ad Hoc Committee should consider sharing this information with stakeholder representatives (e.g., source water providers, environmental groups, industry groups) to gauge support and to refine WQS Alternatives prior to public notice of the triennial review. Before proceeding to stakeholder outreach or Public Notice, the Ad Hoc Committee should conduct the analysis that details specific differences/redundancy among ORSANCO PCS and member state WQS and implementation procedures.

Comment: While it is challenging to coordinate member state and ORSANCO WQS, and modification of the current approach certainly may be warranted, is this the right time to abandon all (WQS Alternative 1) or key provisions of the ORSANCO PCS (WQS Alternative 2)? Might not a better alternative, after evaluating cost, grant funding, impact on monitoring programs, and other factors, be WQS Alternative 3 or a hybrid of WQS Alternatives 3 and 4?

Comments from the Water Users Advisory Committee

Thank you for soliciting the input of the Water Users Advisory Committee (WUAC). We have reviewed your memorandum dated July 18, 2017 with the Subject: *Ad Hoc Committee on Water Quality Standards Implementation and Input Request*. We appreciate the opportunity to provide feedback on the proposed changes to the Pollution Control Standards currently being discussed within the Commission.

While we understand and applaud the Commission's efforts to ensure ORSANCO's programs are appropriate for the needs of the Ohio River, the WUAC does not support the position that the pollution control standards (or the water quality standards therein) are completely redundant with Federal and State rules. The Pollution Control Standards (PCS) were intended to fill a niche that could not be adequately addressed by the states, and that is to view the Ohio River as one system, and to bring consistency to water quality standards. To, in effect, ensure all the various uses for the entire river are protected. This is concisely stated in at least two places in the study commissioned by the USEPA in 1974 to evaluate ORSANCO's role relative to federal and state regulation. The first statement is within the report text itself:

"...neither the states nor EPA is organized to treat the Ohio as a basin, or even as a whole main river. Such treatment is essential if many aspects of the Federal Water Pollution Control Act are to be administered equitably or perhaps at all. ORSANCO is just an agency as can provide the multi- jurisdictional-interstate-federal, EPA regional bridge needed to bring the pieces together basinwide."

Then from the recommendations in the report:

"ORSANCO should work with states in developing consistent stream standards for the main stem and tributaries having significant impacts on the main stem; and in periodic review of the standards. Its interest should be primarily in achieving interstate compatibility and equity."

The study goes on to say:

"Each state formulates stream standards for its own purposes and also for submission to the EPA. However, the emphasis of each state is necessarily on its particular waters both in and out of the Ohio Basin. Since the Ohio is a boundary river, and because there are many other relationships as among the several state segments of the river system, the interstate agency should provide the overall view and the comparative analyses needed for coordination, consistency and equity."

In many ways, the questions being asked in 1974 are like those being asked today, and the WUAC does not believe the answers or ORSANCO's overall mission have changed. The WUAC also does not believe ORSANCO's current mission can be achieved without preserving the ability to maintain the PCS for parameters that lack a federal standard or consistent state standards. The PCS should be the yardstick by which states may be measured when implementing their individual standards applicable to the Ohio River. This helps to ensure minimum standards are set to protect the river as a whole.

While this is the intent of the standards, it is obvious upon a cursory comparative review, significant variation still exists between ORSANCO, USEPA recommendations, and the individual states' water quality standards. The goal of providing a level of uniformity to the standards for the river seemingly has not yet been achieved. Some states' standards appear to adhere closely or are more stringent than ORSANCO's while others are less stringent.

In your July 18 memo, five alternatives were summarized, ranging from total dissolution of the pollution control standards to more aggressive options such as ORSANCO being tasked with establishing uniform water quality standards and taking the lead to eliminate duplication among the states. The recommended alternative for further evaluation was Alternative Number 2, which would remove the water quality criteria, eliminate the mixing zone language and remove portions of the chapter on wastewater discharges. While this alternative retains the right of ORSANCO to later reinstate water quality standards, in all likelihood, this would never happen. The alternative also proposes inclusion of language which says if a state implements programs approved under the Clean Water Act, they are in compliance with the compact. This statement does not support the concept of

ORSANCO as an entity to ensure water quality of the Ohio River is maintained in a consistent manner. Because the main stem of the river is covered by four EPA Regions and six of the eight-member states, it is unlikely the interests of the river as a whole, will be addressed uniformly.

Language in the memorandum suggests one of the reasons for these proposed changes is due to financial concerns, especially with respect to the triennial reviews. If this is the case, we would suggest reducing the frequency of the Standards reviews. This would free staff time to work on other issues. We also are concerned that reducing or eliminating the PCS will in fact, result in a reduction of funding because funding agencies may interpret this change as a reduction in scope, and therefore need, of ORSANCO.

Recent events on the Ohio River and nationwide have brought more attention to the issue of source water protection for drinking water sources. Source Water Protection is a program or series of programs geared toward maintaining, improving, and protecting drinking water sources. One component of source water protection is to prevent or minimize contamination from point and non-point sources. Another component of source water protection is contingency planning for contamination events such as chemical spills. Source Water Protection on the Ohio River is often associated with contingency planning and spill response. Due to the industrial nature of the river, this is appropriate and must be continued. However, control of point sources (dischargers) and non-point source pollution cannot be overlooked, nor can it be addressed by local individual utilities alone.

ORSANCO is uniquely positioned to have a positive impact on Source Water Protection initiatives by virtue of an existing regulatory framework that extends beyond the various political and jurisdictional boundaries. Reducing or eliminating this regulatory framework removes one of the key benefits ORSANCO can provide to protect public health by conducting source water protection on a basin-wide basis. Without the regulatory framework of the PCS, source water protection on the Ohio River becomes far more difficult and will be largely limited to local initiatives with little hope for creating basin-wide changes. It is ORSANCO's role to help address these larger scale source water protection issues. The pollution control standards are tools that should be maintained to allow the states and ORSANCO to address illegal and legal dischargers.

ORSANCO's PCS serve to uniformly address issues which may slip through the cracks of EPA Water Quality Standards or the States' standards. As an example, ORSANCO implemented an ammonia criterion geared specifically to protect drinking water consumers. In this situation, the ammonia standard at drinking water intakes was lower than levels set for protection of aquatic life. The level was determined based on how much ammonia could be present in source water before drinking water utilities' disinfection processes were compromised. This represents a situation where the PCS directly benefited the public in such a way that would likely not be achievable through other means. We have identified several other parameters that meet this category that are important to regulatory compliance of primary and secondary drinking water standards and/or potentially affect treatment costs for drinking water utilities. Upon a cursory review, the parameters include not only ammonia but also E. coli; Fecal Coliform; temperature; combined radium-226 and radium-228; gross total alpha; total gross beta; total gross strontium-90; and silver. We request that the Commission consider keeping standards for these parameters, at a minimum, until a federal standard or consistent state standards are in place.

ORSANCO standards should serve as guidance to the states as they address facilities impacting the Ohio River. The standards should reflect the unique needs of the river as a whole. The standards can also serve to address contaminants of emerging concern where individual states may not have the ability to do so directly.

We understand implementing the pollution control standards and developing consistency among all the compact states are imperfect and incomplete tasks, which is why the WUAC conceptually supports the proposal to remove ORSANCO water quality standards that are redundant to standards set by the USEPA and/or states. However, we recommend maintaining the ability to set standards and working toward consistency across all compact states until a federal standard exists or states adopt the ORSANCO standard. We view this as not just the responsibility of ORSANCO, but also of the individual states as part of their responsibility as members of the compact.

Thank you again for the opportunity to provide input on this issue. We trust the Ad Hoc Committee and ultimately the Commission will use the resources available to them to arrive at a decision which protects the millions of consumers who depend on the Ohio River as their source of drinking water.

Comments from the Watershed Organizations Advisory Committee

ORSANCO provides an important function as a regional water quality standard setting agency. Since the Ohio River flows past or through many states it is important for there to be one base standard to serve as a reference for all affected states. Passing the standard setting responsibility off to each individually affected state as suggested in Alternative #2, invites inconsistency, litigation, political influence, and uneven regulation that will negatively impact the resource and public health.

The members of the WOAC strongly object to Alternative #2, and also agrees with the Minority Report (as stated on pages 22-24 of the July 18, 2017 memo from the Ad Hoc Committee on Water Quality Standards Implementation to the Advisory Committee Chairs).”