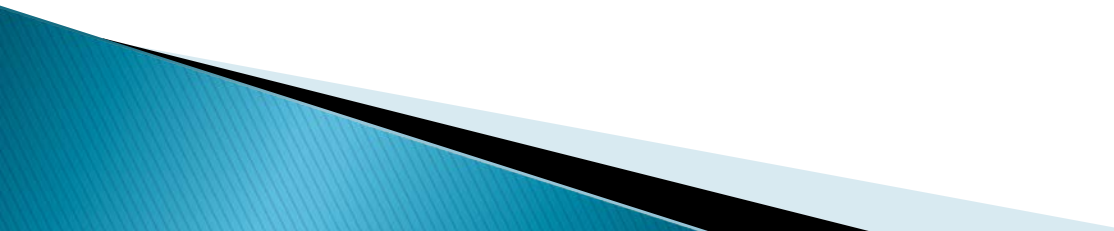


Status of Axial Variance


- ▶ Last TEC meeting staff presented status of Axial variance and recommendations regarding water quality monitoring programs.
 - ▶ Staff was directed to confer with WVDEP which has been completed. WVDEP & ORSANCO in full agreement regarding the following recommendations.
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Annual Report on Implementation of Mercury Minimization Plan

- ▶ Recommend reporting practice that outlines each point of the minimization plan and what was accomplished.

Water Monitoring Program

- ▶ Depth integrated sampling:
 - Axiall indicated that depth integrated sampling would not be conducted under higher flows.
 - ORSANCO & WVDEP recommend that depth integrated sampling be conducted under all safe flows.

 - ▶ Axiall indicated that monthly sampling might not be completed after two false starts due to rain.
 - Don't believe there is good reason for this to occur.
 - Asking for immediate notification.
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ORSANCO comments on Axial's Fish Tissue Sampling Plan

- ▶ Collect 3 composite samples each of TL3 & TL4 species, analyzing 6 samples annually
 - Eliminate samples of TL2 species
 - ▶ Expand initial & final search areas
 - Extremely difficult to get all necessary fish from such limited areas
 - ▶ Provided new list of TL3 & TL4 species in priority order (historically most contaminated to least contaminated)
 - ▶ Consider using gill nets and/or spring sampling
 - ▶ Various minor comments
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