

Questions for TOC Policy Makers

The TOC requests that the Principles provide guidance in answering the following questions. We request any additional guidance that might help the TOC direct it's technical analysis and focus.

N. Aumen

1. When making the comparison, are we comparing to the standard or to the criterion or the level?
2. Are we to make this comparison for the Park?

M. Harwell

1. Does the determination result in one test being used from here on out or do we make that comparison on a monthly or yearly or other interval basis for application?

F. Nearhoof

1. Do the Principles agree lower is synonymous with more protective?

M. Waldon

1. TOC is supposed to decide if the Lower of Class III criterion or long-term levels are being met, or do we wait until we have 5 years of monitoring data to determine if these were met after Dec 2006?
2. After Dec 2006 if the TOC selects a Class III criteria as lower, who will determine violations of the Consent Decree and how will they be determined?

G. Redfield

1. What is the role of the determination made by the USEPA indicating that the Appendix B approach or equation is not protective of the Refuge?
2. Is it sufficient to show that the compliance levels required by the Phosphorus Rule are lower than the compliance levels of Appendix B.