To: plavigne@mt.gov[plavigne@mt.gov]; Blend, Jeff[jblend@mt.gov]
From: Laidlaw, Tina
Sent: Fri 9/6/2013 7:49:46 PM
Subject: RE: Meeting on the 18th

Yes—let's explore all these ideas. I just think we need to make it make sense and be real for several towns… if we want them to support adoption of criteria.

From: LaVigne, Paul [mailto:plavigne@mt.gov]
Sent: Friday, September 06, 2013 1:46 PM
To: Blend, Jeff; Laidlaw, Tina
Subject: RE: Meeting on the 18th

[redacted] No matter what else comes out of this meeting, I think it will be good to listen to Shari's perspective because I think some misunderstandings may be able to be addressed.

We may be able to take a backdoor approach to your idea, Tina. Maybe we could take a town, a real town, figure out what their current rates and MHI are, and MAYBE some other economic factors and figure out a range of costs that could be used to fund a nutrient removal project. It would be really interesting to do it for a large and small system so that these folks from the big communities can see what these smaller systems are up against.

Anyway, just a thought.

Paul

From: Blend, Jeff
Sent: Friday, September 06, 2013 12:20 PM
To: Laidlaw, Tina; LaVigne, Paul
Subject: RE: Meeting on the 18th

What you said in the second paragraph is not entirely true. Towns that are under 2% MHI can still apply for an individual variance (we actually set the bar lower at 1% MHI). That does not mean they will get an individual variance as MTLOCT seems to think (that is, if you apply you

automatically get it), because they still have to prove economic hardship in the application.

"I'd hate to see communities think they can apply for an individual variance and have it disapproved."

And yet, that is exactly what could happen if they do not convince us of economic hardship. So, I hope they do know it could be disapproved. Not that most would be disapproved, but that is one possible outcome.

Jeff

From: Laidlaw, Tina [mailto:Laidlaw.Tina@epa.gov]
Sent: Friday, September 06, 2013 12:14 PM
To: Blend, Jeff; LaVigne, Paul
Subject: RE: Meeting on the 18th

I agree. If they don't agree with the numbers, they can tweak them. But Shari is spinning things in terms of the amount of money a community would generate and thinks that is the kind of info a town needs to make decisions. So, we could translate those values into %MHI to see how things stand.

Jeff, your analysis would suggest that most towns aren't eligible for an individual variances even if the general variance goes to 6 mg/ L TN and 0.6 mg/L TP. So -- I think that is a key point we need to understand and see where we stand on things. Otherwise, I'd hate to see communities think they can apply for an individual variance and have it disapproved.

Those are the kind of details I'm hoping we can iron out. Still game?

From: Blend, Jeff [mailto:jblend@mt.gov]
Sent: Friday, September 06, 2013 12:09 PM
To: plavigne@mt.gov; Laidlaw, Tina

Subject: RE: Meeting on the 18th

I agree with Paul. What we are being asked is to tell towns what they will need to each pay. That is impossible. The best we can do is give a range of estimates. The general variance was meant to be reached by all non-lagoon towns at a reasonable cost and the variance as an escape hatch. It looks like most towns want the variance. They are never happy with our analysis. At some point, we need to just push forward. Maybe if we outline one or two examples, that would help.

Jeff

From: LaVigne, Paul
Sent: Friday, September 06, 2013 12:03 PM
To: Laidlaw, Tina; Blend, Jeff
Subject: RE: Meeting on the 18th

Tina, I think the biggest unknown, the most difficult question to answer and probably the single most important issue is: how much will this cost each community? We've obviously done the broad brush approach. I think Jeff has done a tremendous job there. But, in my opinion, to try to estimate costs for specific communities is about impossible without going into a full planning-level analysis – it is just so site-specific. I just don't have any suggestions about how to do this at that 'individual' level on any sort of defensible basis. Maybe Shari or Jeff can help there. But, we can certainly look at the WERF stuff and their assumptions and see if we are on the same page.

Paul

From: Laidlaw, Tina [mailto:Laidlaw.Tina@epa.gov]
Sent: Friday, September 06, 2013 11:42 AM
To: LaVigne, Paul; Blend, Jeff
Subject: RE: Meeting on the 18th

So – here is my "vision" (practicing for our meeting. ☺)

1. Let's look at Jeff's spreadsheets on the economic analysis for several specific communities – starting with the < 1 MGD group (we can let Shari pick the ones we review)

2. We can examine whether the WERF generic cost estimates to upgrade the plants to meet 6 mg/L and .6 mg/L TP (?) are accurate or completely off base. If incorrect, we can have Shari and Paul provide rough cost estimates.

3. Let's look the community stats – did we miss anything?

4. If needed, quickly recalculate the economic impacts based on revised numbers. Is the MHI above 2%, demonstrating hardship? Are the proposed treatment technologies "affordable" or do we need to evaluate different treatment options?

5. Translate the values into numbers that mean something to the community (Shari had some ideas here).

6. Review values and see what we think is realistic.

7. Basically, for several communities, we'd be sketching out a plan for what the longer-term expectations would be for several smaller communities to see what the impacts would be.

[redacted]

From: LaVigne, Paul [mailto:plavigne@mt.gov]
Sent: Friday, September 06, 2013 11:20 AM
To: Blend, Jeff; Laidlaw, Tina
Subject: RE: Meeting on the 18th

[redacted]

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From: Blend, Jeff
Sent: Friday, September 06, 2013 11:19 AM
To: LaVigne, Paul; Laidlaw, Tina
Subject: RE: Meeting on the 18th

[redacted]

From: LaVigne, Paul
Sent: Friday, September 06, 2013 11:15 AM
To: Blend, Jeff; Laidlaw, Tina
Subject: RE: Meeting on the 18th

[redacted]

Paul

From: Blend, Jeff
Sent: Friday, September 06, 2013 9:53 AM
To: Laidlaw, Tina; LaVigne, Paul
Subject: RE: Meeting on the 18th

No—I still have no specific idea. My sense is that we need to get stakeholders on board in terms of how the variance process works and get them un-confused. How we do that is beyond me, so I have no specific ideas. Maybe go through a few examples in detail?

Jeff