To: Montgomery, Michael[Montgomery.Michael@epa.gov]
From: Albright, David
Sent: Thur 10/9/2014 6:24:50 PM
Subject: Call with Rob

We had a good conversation (it was Rob, Jerry Salera, and one of their staff), but I was a little surprised that they did not have more detailed/specific questions and issues for me. We talked about the checklist and the aquifer exemption criteria, but the focus was still at a more strategic/conceptual level. They said it was very useful for them, so I'll go with that. One issue that came up is the importance of the Water Board and their role. I think DOGGR is still coming to grips with the idea that State/Regional Board will be playing a significant role in the consideration of potential aquifer exemptions. One example they gave was a non-hydrocarbon producing formation with quality between 3,000 and 10,000 ppm TDS, where an exemption would be sought for disposal of waste with TDS of about 20,000 ppm TDS. Apparently, Board staff have indicated concerns over such a scenario due to the state's anti-degradation provisions.

I offered for me and Michele to stay on Tuesday afternoon to continue technical discussions, but Rob was not certain how prepared they would be for such discussions. Again, I believe they are realizing that a lot of the technical discussions and issues they have to work through are actually internal to the State. We left it as Michele and I will be prepared to stay on if that will be useful.

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