DRAFT Proposed Discussion Topics (EPA) – 8/11/16

Phase 1

- Nondegradation/Antidegradation of surface water (Plant Site)
- Reasonable potential / Effluent Limits
- Conductivity – numeric interpretation of narrative standard
- Demonstration of no discharge
    - Mine Site
    - Plant Site
- Tailings basin area construction water management
- Flushing of legacy pollutants once trench is installed/operating

Phase 2

- North flow path
- Mine Site & Plant Site Monitoring
    - Locations
    - Parameters
- Baseline exceedances of surface water standards (non-legacy)

Phase 3

- 40 CFR Part 440
    - 40 CFR Part 440.104 (Subpart J)
    - TBELs (Subpart J, G, and K)
- Performance verification of FTB seepage collection system
- Transportation corridor monitoring

*Topics for discussion are grouped by timing aspect and not necessarily in order of importance.

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Disclaimer: This document is a working document. This document may change over time as a result of new information, further deliberation or other factors not yet known to the agency.