

- Who is the discharger responsible for compliance and obtaining a CII permit?
- Individual NPDES Permits must be as stringent to avoid a CII Permit obligation, but what constitutes “as stringent,” who makes that determination, is a CII permit required if the NPDES permit will be updated in its reissuance to include additional provisions to be “as stringent” as the CII, etc.
- Contiguous parcels, easements in need of changes/clarity
- Linear routes – pipelines, rail lines, utilities
- Sampling & monitoring
- Focus on RDA-defined copper & zinc
- Efficiencies w/ IGP sampling – surrogate/representative sampling?
- How many samples needed? From all potential outfalls?
- Background, aerial deposition – limit responsibility/obligations under CII with data/demonstration
- Impervious surfaces, gravel roads/surfaces
- Compliance Option #1 – more clarity, detail, cost structures, different approach entirely?
- Pollutant level factor needs more work, clarity and overall is this the best approach?
- Compliance Option #3 – immediate violation vs IGP approach that has Level 1 & 2 corrective action
- SF / US EPA Supreme Court Case – did the LA Board hit the mark?