

US EPA ARCHIVE DOCUMENT

**Proposed Rules to Reduce Nutrient Pollution in Florida's Waters  
January 23, 2013 Webinar**

This document is the transcript for the Proposed Rules to Reduce Nutrient Pollution in Florida's Waters webinar held on January 23, 2013.

**MODERATOR –GERALDINE CAMILLI**

**SLIDE: PROPOSED RULES TO REDUCE NUTRIENT POLLUTION IN FLORIDA'S WATERS**

Good evening, and welcome to today's webinar on EPA's Proposed Rules to Reduce Nutrient Pollution in Florida's Waters. Thank you for joining us. This webinar is sponsored by EPA Region 4 and EPA's Office of Science and Technology. I am Geraldine Camilli with the Horsley Witten Group and I will be moderating today's webinar.

Today's webinar is the second in a series of three webinars designed to provide an overview of EPA's proposed rules to reduce nutrient pollution in Florida and to take verbal comment from members of the public on the rules.

The first webinar was held yesterday morning and the third webinar is scheduled for tomorrow, January 24<sup>th</sup>, from 2:00 to 4:00 p.m. All three webinars provide the same information, so you do not need to reregister for tomorrow's webinar if you are attending today. All of these will be recorded and archived on EPA's website.

**SLIDE: TIPS FOR ATTENDING OUR WEBCASTS**

Before we get too far, if you're hearing an echo, please close all browser windows except for the webinar presentation. You can also mute the presentation using the microphone icon in the lower left corner of your screen. If you're experiencing technical difficulties with the webinar, you can request assistance by entering your webinar technical issue into the white box at the bottom of your screen just below the slide and clicking the "Ask" button to receive tech support. If you cannot see that white box, scroll on your screen to below the slide level and you'll see that box appear. Your technical questions and the responses from our tech team will appear at the bottom of your screen below the white box where you entered your question.

**SLIDE: GUIDE TO OUR WEBCASTS**

If you would like to see closed captioning, please make sure you turn off your pop-up blocker and click on the "Closed Captioning" button on the top of your screen.

During this webinar we will poll participants in that view to get a better sense of who you are, where you come from, and how you found out about the webinar. To complete the poll questions and the evaluation at the end of the webinar, select the radio button to the left of your choice and click "Submit." Please do not type your answer in the "Ask" box as that answer will not be combined with the other answers.

SLIDE: WEBINAR FORMAT

The format of this webinar resembles that of a public hearing. Following a presentation given by the EPA Director for Region 4 Water Protection Division on the proposed rules, you will be provided an opportunity to make a verbal statement or comment. Please note that the purpose of the webinar is to take public comment, so in the interest of time and to accommodate as many speakers as possible, EPA will not be responding to comments at this time. In order to receive as many comments as possible within our two hour time window, each speaker will be given three minutes before we move on to the next speaker. Should there be more speakers than can be accommodated within the two hour webinar, the time will be extended by an additional half hour. If this additional half hour is not sufficient to accommodate the remaining speakers we'll ask that the remaining speakers register for tomorrow's webinar and request to speak at that time.

Please keep in mind that you are also welcome to provide your comments in writing at any time during the comment period either online at [regulations.gov](http://regulations.gov) or by emailing or mailing your comment to the Docket.

SLIDE: DOWNLOADS

For instructions on how to submit comments in writing, please select the "Downloads" button at the top right hand side of your screen. You will see a downloadable PDF document titled "How to Submit Comments." Click on that title to download the document. You can download a copy of the slides by selecting the PDF document titled "Presentation Slides" under that Downloads" button.

SLIDE: MAKING A VERBAL COMMENT

If you're interested in speaking, please let us know by using the same box as for asking questions about tech issues. This box is at the bottom left corner of your screen and is followed by an "Ask" button. Typing "I would like to make a spoken comment" in the box and pushing the "Ask" button will add to the queue of requests. After the initial presentation, we will send a phone number to participants who request to speak. If you request to speak, you will see the phone number to call appear at the bottom of your screen when it is your turn to call. Once you call, an operator will greet you and ask you for your name. You will then be placed on hold until it is your turn to speak. As I mentioned earlier, we will do our best to accommodate as many of you as possible but we will be limited to the duration of this webinar. You can also provide your comments in writing at any time during the comment period either online at [regulations.gov](http://regulations.gov) or by emailing or mailing your comment to the Docket.

Please remember that these webinars are being recorded and the recordings will be archived for public viewing on EPA's website.

Before we begin our presentation I have a couple of quick poll questions. These questions will be posted in the slide window. Please submit your answers in that same slide window by clicking one of the radio buttons.

So, on to the first question, you should see this appear on your screen. Did you attend the public availability session in Tampa last week? For those of you unaware, we hosted the public in Tampa last week and held a public availability session, just curious to know how many of you

came to Tampa and attended. Once you've answered your poll, you will see the results appear on the next slide. So, if you're not seeing the results, then please click one of the radio buttons and click "Submit." Seems like a few of you did come last week. And we probably already met. Let's also find out how many of you are interested in speaking today.

You'll see another slide appear that is asking if you're interested in speaking today. If you would like to speak, please select "Yes". This will not allow you to speak immediately, but this will give us a sense of how many of you are interested in speaking at the end of this webinar.

We'll leave that slide up just to get a better sense for a couple seconds. And as I mentioned earlier, if you're not seeing the results of the poll, make sure that you click your radio button and click "Submit" and your poll answers will be submitted to the system.

Seems like a majority of you may not be interested in speaking today. For those of you who are, we look forward to hearing your comments.

SLIDE: PROPOSED RULES TO REDUCE NUTRIENT POLLUTION IN FLORIDA'S WATERS

So today Mr. Jim Giattina will provide an overview of EPA's proposed rules to reduce nutrient pollution in Florida. Mr. Giattina is the Director of the Water Protection Division of EPA's region 4 office in Atlanta, Georgia. He's responsible for planning, coordinating and implementing all regional EPA water programs related to the Clean Water Act, the Safe Drinking Water Act, and the Marine Protection Research and Sanctuaries Act. Jim, it's all yours.

EPA SPEAKER – JIM GIATTINA

Thank you, Geraldine. Good evening. Welcome to the EPA webinar. We hope that you find the information informative and we encourage you to listen carefully to what we're providing and presenting today and provide any comments that you have on our proposed rules.

This presentation provides an overview of EPA's proposed rules to reduce nutrient pollution in Florida. Nutrient pollution causes algal blooms and is among the largest contributors to water problems in the state. Though EPA recently approved Florida's own rules to protect many waterways, EPA has proposed two federal rules to address water bodies not covered by the states rules, or potentially not covered by the state's rules. If Florida adopts rules covering additional waters that meet Clean Water Act requirements, EPA is prepared to not move forward with, or will withdraw, its federal rules.

SLIDE: THE PROBLEM

Nutrient pollution is one of America's most widespread and costly and challenging environmental problems. Excess nitrogen and phosphorus are carried into waterways from farms, urban stormwater, and discharges from wastewater treatment plants. The nutrients that help plants thrive on land feed algal blooms in water. These blooms can produce toxins that are harmful to humans, animals, and ecosystems. The number of waters that are impaired in Florida due to nutrient pollution has been increasing and EPA is working with Florida to ensure that appropriate numeric nutrient pollution limits, called criteria, are in place.

SLIDE: HEALTH AND ENVIRONMENTAL IMPACTS

Numeric nutrient criteria are needed because nutrient pollution negatively impacts the environment, human health, and the economy. Excess nitrogen and phosphorus can damage the environment and reduce water quality. Algal blooms consume large amounts of oxygen in their growth and death process and reduce dissolved oxygen in water. Sometimes to the point that the water no longer supports aquatic organisms and results in fish kills. Algae can also clog fish gills in cloud water making it difficult for aquatic life to find food. In addition, excess algae reduces the amount of light available to aquatic plants like seagrass, which protects spawning and juvenile fish and helps sustain the fishing industry. Certain types of blue green algae emit toxins which can be harmful to fish, shellfish, marine mammals and any species that make contact with contaminated waters, including humans and their pets.

SLIDE: HEALTH AND ENVIRONMENTAL IMPACTS

People who come into physical contact with certain algae may experience rashes or more serious health issues. Toxins emitted by certain algae can be harmful if swallowed and represent a threat to public drinking water supplies. These toxins as well as the nutrient pollutants themselves are difficult and costly to remove from the water once they've been introduced. When combined with disinfectants such as chlorine, nutrient pollution can create disinfection byproducts that pose additional health risks.

SLIDE: ECONOMIC IMPACTS

There are also important economic reasons for reducing nutrient pollution. Clean water is vital to the state's economy. Tourism is Florida's largest industry employing a million Floridians and generating over \$3 billion in tax revenue. Tourists spend more than \$60 billion in Florida each year. If excessive nutrient pollution reduces water quality, tourists may turn to other beaches and destinations to enjoy fishing, boating, and other water related activities. Impacts to the tourism industry are likely to affect other related industries and economic activities in Florida and could result in job losses and reduced property values across the state.

SLIDE: IMPORTANCE OF NUMERIC CRITERIA

Why are numeric criteria so important for Florida waters? These criteria provide a definite numeric goal for the maximum nitrogen and/or phosphorus concentration allowed in a water body. They are easier to work with and less subject to interpretation and legal challenges than narrative criteria alone, which are simply descriptions of clean water conditions. Numeric nutrient criteria also make it easier for state permit writers to develop definitive discharge permit limits and help in developing watershed management plans.

SLIDE: TIMELINE

In January of 2009, EPA issued a determination under the Clean Water Act that numeric nutrient criteria are necessary in Florida, whether adopted by the state or by EPA. That is where our time line for nutrient pollution rule development in Florida begins. Following its determination, EPA entered into a Consent Decree with Florida Wildlife Federation and several other groups in August of 2009. Under the Consent Decree, EPA committed to a schedule to propose and finalize nutrient pollution rules covering Florida's inland and coastal waters if the state did not act first. The Consent Decree has since been revised and some deadlines have been extended. EPA finalized its Inland Rule in December 2010; however, the state submitted its own rule

covering many of the same waters in June of 2012 after clearing state level administrative challenge.

EPA approved Florida's rule in November of 2012, and we are still required to move forward with its federal rules for waters not covered by the state's rule. This included a new rule covering some provisions in the final Inland Rule that were remanded or sent back by the court to EPA for further clarification. EPA signed proposals for both the Inland Rule, Remand Rule, and the Coastal Rule on November 30th, 2012. These proposals are the subject of today's webinar.

While EPA must now finalize the Inland Remand Rule and the Coastal Rule by August and September of 2013 respectively, the agency is prepared to not move forward with, or withdraw, its rules for any waters that become covered by state law that meets the requirements of the Clean Water Act.

SLIDE: DEVELOPING CRITERIA - BASICS

EPA rules interpret Florida's existing narrative criterion, which is shown on the slide. The EPA regulations specify that water quality standards must protect designated uses, be based on sound science, and address downstream water quality standards. EPA guidance on nutrient criteria provide three methods for criteria development. First, a reference condition approach, which uses nitrogen and phosphorus data from times and places where designated uses are being met to project levels of nutrients that are associated with the condition of use support. The second is a stressor response analysis, which uses nutrient and biological response data to determine nitrogen and phosphorus concentrations when a target biological condition is being met. And the third is mechanistic modeling, which uses data on physical and ecological processes in a simulation to predict nitrogen and phosphorus concentrations when a target biological condition is being met.

SLIDE: NEW STATE RULES

The Florida Department of Environmental Protection, or FDEP, worked for years to collect data on the condition of statewide waters and develop its own numeric nutrient criteria. FDEP's rules use scientifically sound approaches to protect the many uses of Florida's waters from fishing and swimming to drinking. Because Florida and EPA work together to develop the science, the numeric limits for nitrogen and phosphorus allowed in springs, lakes, and streams, those streams outside South Florida, are virtually identical to those in EPA's 2010 Inland Rule developed to protect these same waters. Again, because the states rules do not cover all of Florida's waterways, EPA was obligated under the Consent Decree to propose two federal rules for those water bodies not covered by the state.

SLIDE: EPA'S PROPOSED RULES

One federal rule known as EPA's Proposed Inland Rule, Inland Remand Rule, serves to clarify some provisions in the 2010 final EPA Inland Rule that were remanded or sent back by the court for further clarification. While upholding EPA's January 2009 determination that numeric nutrient criteria were needed in Florida, and much of EPA's 2010 rule, the court invalidated EPA's numeric criteria for Florida's streams. In the Remand Rule, EPA has re-proposed the same numeric nitrogen and phosphorus criteria that we included in the 2010 rule, but we

provided further explanation of how the criteria will ensure the protection of Florida's streams. EPA has also provided additional evidence of the harmful, adverse effects likely to occur at concentrations above these proposed stream criteria. Though EPA's rule only applies to streams not covered by the state's rule, a provision of Florida's law and a recent legal challenge make it unclear if and when Florida stream criteria will take effect. In the event that the state's criteria do not take effect, EPA will finalize criteria for all of Florida's streams.

SLIDE: PHASE 1 FINAL RULE LITIGATION

It is important to give a summary of why we are doing the Phase 1 Inland Remand Rule. Again, in response to EPA's 2010 rulemaking, EPA received multiple challenges. The court upheld much of EPA's actions but invalidated or remanded the numeric criteria for flowing waters and the default option for calculating downstream protection values or DPVs for unimpaired lakes. The court determined that EPA either aimed at the wrong target, that is, preventing any increase in nutrients as opposed to preventing any increase that causes harm, or EPA did not sufficiently explain what it did in aiming for the right target for both streams and the downstream protection values for unimpaired lakes.

To address these two points, EPA prepared clarifications and new default approaches on November 30th. And again, EPA must finalize these by August 31st, 2013. Because EPA believes that its original approach for streams is scientifically sound, EPA re-proposed the same criteria values as in the 2010 final rule but provided additional explanation. EPA further explained the appropriateness of the use of a reference condition approach for streams that sets the numeric nutrient criteria at an upper percentile of the data from a set of least impacted conditions. In addition, EPA provided documentation from new analysis and from peer reviewed literature that harmful adverse effects due to nutrients are more likely to occur at concentrations above the numeric stream criteria.

SLIDE: PROPOSED INLAND REMAND RULE

Because EPA recently approved FDEP's numeric nutrient package, the EPA's inland criteria would apply to only Class 1 and Class 3 streams that are not covered by Florida's rule.

To address the remand of the default downstream protection values for unimpaired lakes, EPA revised its original approach and added three alternatives. EPA's preferred approach is to use modeling, since it results in the most refined downstream protection values. However, if modeling is not available, the next three options are. First, setting the default downstream protection value at the pour point to the lake equal to the downstream lake criteria for total nitrogen and total phosphorus. Second, setting the default downstream protection value equal to EPA's default downstream protection value, which were calculated using simple regression models that relate lake nutrient concentrations to upstream nutrient concentrations. And third, calculating the default downstream protection value using stream nutrient concentrations that coincide with time periods when the downstream lake is meeting the lake chlorophyll-a, total nitrogen, or total phosphorus criteria. These default options are intended to provide flexibility in calculating downstream protection values where there is not sufficient information to develop a model.

SLIDE: EPA'S PROPOSED RULES

The other federal rule known as the EPA's Proposed Coastal Rule establishes numeric nutrient criteria for Florida's estuaries and coastal waters as well as inland flowing waters in South Florida, such as streams and canals. EPA is proposing to use location specific approaches to derive the applicable numeric nitrogen, phosphorus, and chlorophyll-a criteria in order to ensure the diversity of unique habitats and each type of water body is protected. Please be aware that EPA has presented alternatives in the proposed rule and solicited comments. We are not discussing the alternatives in this presentation.

SLIDE: PROPOSED COASTAL RULE ESTUARY CRITERIA

Several marine waters are covered by Florida's newly approved rules, including Clear Water Harbor, St. Joseph Sound, Tampa Bay, Sarasota Bay, Charlotte Harbor, Estero Bay, Clam Bay, Tidal Cocohatchee River, Ten Thousand Islands, Florida Bay, Florida Keys, and Biscayne Bay. EPA is no longer required to propose numeric criteria for these waters.

SLIDE: PROPOSED COASTAL RULE ESTUARY CRITERIA DERIVATION

EPA conducted estuary specific analysis for the remaining estuaries to recognize the inherent variability of the estuary systems. EPA's process included compilation of data, selection of end points and further segmentation of each estuary. The endpoints utilized by EPA are, first, water clarity, which is necessary for maximum depth of seagrass colonization and persistence. Second, chlorophyll-a concentrations which are associated with balance phytoplankton biomass. And finally, dissolved oxygen levels which are required for sensitive aquatic life, particularly their survival, growth and reproduction.

SLIDE: PROPOSED COASTAL RULE ESTUARY CRITERIA DERIVATION

Once the information is compiled, EPA uses the data in statistical or mechanistic models, depending on which are more appropriate. EPA then derives numeric criteria for total nitrogen, total phosphorus, and chlorophyll.

SLIDE: PROPOSED COASTAL RULE DOWNSTREAM PROTECTION

As provided in EPA's 2010 rule, downstream protection values related to estuaries were addressed in the Phase 2 Coastal Rule. EPA proposed the four approaches specified in this slide as ways to calculate downstream protection values.

SLIDE: PROPOSED COASTAL RULE INLAND FLOWING WATERS OF SOUTH FLORIDA

Due to the complexity of flowing waters in South Florida, EPA's primary proposal utilizes downstream protection values to manage nitrogen and phosphorus pollution in the inland flowing waters and to protect the water quality of estuaries and coastal waters downstream., however, EPA is taking comment on an alternative to the downstream protection value only approach. This alternative includes protective in stream nutrient criteria for three regions in South Florida. These regions do not include the Everglades Protection Area or the Everglades Agricultural Area.

SLIDE: PROPOSED COASTAL RULE SOUTH FLORIDA INLAND WATER CRITERIA DEVELOPMENT

In developing the South Florida Inland Flowing Water Approach, EPA acknowledged these key four points. First, surface water relationship south of Lake Okeechobee are complex because

they are extensively managed. Second, there are ongoing comprehensive restoration efforts underway. Third, the establishment of downstream protection values ensures there is balance to aquatic flora and fauna in the in estuarine waters downstream. And fourth, when downstream protection value criteria are exceeded, the collective set of inland waters draining through that point will be considered impaired.

Note again that these criterias do not apply to waters within the lands of the Seminole and Miccosukee tribes, the Everglades Protection Area, and the Everglades Agricultural Area.

SLIDE: PROPOSED COASTAL RULE SOUTH FLORIDA INLAND WATER CRITERIA DEVELOPMENT

In summary, EPA's proposal for South Florida inland flowing waters includes total nitrogen and total phosphorus downstream protection values for 22 locations where inland flowing waters meet marine waters. These downstream protective values do not apply to Tribal lands, the Everglades Protection Area or the Everglades Agricultural Area. The approaches for deriving these downstream protection values were described earlier.

SLIDE: PROPOSED COASTAL RULE COASTAL WATERS

For those coastal waters extending three nautical miles from the shore line, EPA is proposing criteria for waters not covered by Florida in its rule. The criteria include chlorophyll-a for three coastal regions shown on the map. Except for the Big Bend region, the criteria were developed using data from satellite remote sensing. EPA used a modeling approach to develop the Big Bend criteria. For coastal waters in the Big Bend area, EPA used a modeling approach due to the lack of remotely sense data due to bottom reflectance because of the shallow waters in this region.

SLIDE: PROPOSED COASTAL RULE COASTAL WATERS

This slide provides an overview of the coastal water approach from data compilation, to selection of a sensitive endpoint, and ending with derivation of the criteria.

In addition to the information presented, it is important to know that based upon the Science Advisory Board advice, EPA excluded chlorophyll-a data collected during known red tide events as not being representative of truly referenced conditions.

Together with FDEP's approved rules, EPA's proposed rules seek to improve water quality and protect public health, aquatic life and the long term recreational uses of Florida's waters, which are a critical part of state's economy. EPA's goal is for the state to adopt appropriate numeric nutrient criteria for all remaining Florida waters, thereby eliminating the need for our federal rules.

SLIDE: FOR ADDITIONAL INFORMATION

You may wish to visit EPA's website at [go.usa.gov/g6qe](http://go.usa.gov/g6qe). Feel free to contact Erica Fleisig at 202-566-1057 or [fleisig.eric@epa.gov](mailto:fleisig.eric@epa.gov). That is [fleisig.eric@epa.gov](mailto:fleisig.eric@epa.gov). Contact Erica for any questions that arise after today's seminar.

SLIDE: SUBMITTING COMMENTS

EPA is seeking comments on both its Proposed Inland Remand Rule and Proposed Coastal Rule. Your comments are very important to us. Comments on EPA's Inland Remand Rule must be submitted on or before February 1st, 2013, while comments on the Coastal Rule must be submitted on or before February 19th, 2013. You may submit your comments in person during today's webinar, as described earlier, as well as online at [www.regulations.gov](http://www.regulations.gov). You can submit them by email or by regular mail. Detailed instructions for submitting comments following today's webinar are posted online at [www.regulations.gov](http://www.regulations.gov).

SLIDE: NEXT STEPS

EPA has long held that water protection is best conducted at the state level and will continue to assist the state of Florida in reaching that goal. Both the EPA Inland Rule that was finalized in 2010 and the two proposed federal rules discussed in this presentation were developed to help Florida protect all its waters from nutrient pollution.

Some or all of the EPA's rules can be rescinded if Florida adopts and EPA approves state rules to replace them. In the meantime, a stay of EPA's 2010 Inland Rule has been proposed through November 2013. This would delay the applicability of EPA's Inland Rule while Florida clarifies implementation of its own rules for inland waters. Florida also recently adopted nutrient pollution rules for Panhandle estuaries and EPA expects FDEP will soon submit the new rules for EPA's formal review under the Clean Water Act.

This concludes my presentation and I appreciate everyone who has participated in the webinar. We're now ready to take any comments or questions, but again, EPA will not be responding to those at this time. We'll be preparing a response and a summary for all the comments and questions that we receive.

MODERATOR – GERALDINE CAMILLI

SLIDE: MAKING A VERBAL COMMENT

Thank you, Jim. As Jim mentioned, we'll now be taking verbal comments. If you would like to speak and make a comment, you should now see a phone number appear on your screen and that is 877-407-0315. You will be patched into an operator who will ask you for a password to make sure that you're patched into this current webinar. Your password for this webinar is 31321. And we will be taking calls in the order that they are received and we look forward to hearing your comments. We'll leave the slide up for a couple of minutes in case you want to call, and then we'll start with a few poll questions to find out where you're calling from and how many of you are attending this webinar. So you'll hear a pause. We haven't disappeared. We're still here. We're just waiting for people to call in.

While we wait, I would like to remind everyone that you are welcome to provide any written comments. If you would like instructions on how to do that or where to send your comments, you can click on the "Downloads" button at the top of your screen and you will have a document that you can download that has been posted up there called "How to Submit Comments." This will have information on the Docket number that you should provide when you submit your

comment so that it can go to the right rule, or the right Docket, and we look forward to hearing your comments.

SLIDE: VERBAL COMMENT PERIOD

So I'll just repeat the phone number one more time and then we'll start with a couple of polls. The phone number to dial if you would like to make a verbal comment is 877-407-0315. The participant password is 31321. While we wait for people to dial in, we would like to ask you a couple more questions.

The first question is to find out where people are from. Are you from Florida? Are you from outside of Florida but often visit Florida? Or are you from outside of Florida and rarely or never visit Florida?

If you are not seeing the answers on your screen but only the radio buttons, select a relevant radio button on the left hand side and click the "Submit" button. You'll then see the results appear on your screen. Seems like most of you are from Florida, and regardless, welcome everyone. We look forward to hearing from you.

Here is another question for the audience. How many people are participating at your location today? In other words, are you participating in a conference room with several people or are you by yourself? So is it just you, two to five people in your room, six to ten, ten to twenty, or more than twenty? That just gives us a sense of how many people participated.

We'll wait for a little while for people to answer this poll. In the meantime, I would like to remind everyone that written comments are always welcome within the time frame of submitting comments, and that's until February 1st or February 19th, depending on which rule. And instructions are provided under the "Downloads" button in the "How to Submit Comments" page. On the screen we'll put the phone number back in case you would like to dial in. You'll hear silence. Again, we haven't disappeared. We're just waiting for people to call in if they would like to make a comment.

MODERATOR – GERALDINE CAMILLI

While we wait for people to call in, we have a quick survey for everyone to fill out if you don't mind. It will be appearing on your screen. We look forward to your feedback on this webinar.

Maybe another minute for people to finish the survey and, again, I would just like to remind you that if you're interested in calling or making a verbal comment, it's 877-407-0315 and the participant password is 31321. We'll probably give everybody another ten minutes and if within ten minutes we don't hear from anyone, this will be concluding our webinar for today. You'll hear a pause. Again, we're still here and looking forward to hearing comments.

So this is Geraldine, the moderator for the webinar. We'll still be waiting a few more minutes for any comments to come in. Again, the number is 877-407-0315. When prompted you should provide the password, 31321, and that should all be on your screen. If you change your mind or if you decide you do have a comment and would like to provide it verbally, I recommend that you register for tomorrow's webinar. It will be held from 2:00 to 4:00 p.m. That will be your

last opportunity to provide a verbal comment. Otherwise written comments are welcome through the Docket by following the instructions provided in the “Downloads” button. There is a "How to Submit" PDF document that you can download and follow the instructions.

**MODERATOR – GERALDINE CAMILLI**

This is Geraldine again, your moderator for the webinar. At this time, I would like to conclude today’s webcast. It seems that we did not receive any verbal comments, but like I mentioned earlier, if you change your mind and would like to provide that, please register for tomorrow’s webinar that will be held from 2:00 to 4:00 p.m. You are also welcome to provide your comments at any time in writing either by email or online at [regulations.gov](http://regulations.gov) or mailing your letter to the Docket. The instructions are in the “Downloads” area in the "How to Submit Comments" button. So thank you very much, Jim, for presenting today, and of course, thanks, everyone, for providing their comments. We look forward to reading them when you submit them online, and this will end our webcast for today.