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Moderator: Ephraim King
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Operator: Good morning. My name is Darla and I will be your conference operator today. At this time, I would like to welcome everyone to the Region 4 Florida Nutrient Ruling Clarifying Points, Rules and Developments.

All lines have been placed on mute to prevent any background noise. If you should need assistance during the call, please press star, then zero and an operator will come back online to assist you. Thank you. Mr. King, you may begin your conference.

Ephraim King: Good morning. My name is Ephraim King. I am Director of the Office of Science and Technology at the Environmental Protection Agency and with me this morning is Lauren Petter from EPA's regional office in Atlanta, Region 4, and Lauren's going to help us this morning coordinating comments and helping us with answering questions.

What I'd like to do right now is make sure that we're all on the right conference call. This is a call which we're going to provide to you a summary of EPA's final numeric criteria to address phosphorous and nitrogen pollution in Florida's inland water. And we've got some, I think, great materials to share with you this morning and then we have a wonderful opportunity to answer questions and provide feedback.

So Lauren, let me turn it over to you for some of the basic ground rules and how we're going to run this and then we can start off.

Lauren Petter: All right. Thank you, Ephraim. In order to ensure that all participants can listen in without issue, we will be muting the audio lines for the participants as you heard from the operator. However, in order to allow for the question and answer portion of this webinar, you will be able to submit your questions electronically via the chat function located on your menu bar.

In order to submit a question, locate the menu bar on the right side of your screen, expand the chat box window down near the bottom of the menu bar, type in your question and then select send chat or question to U.S. EPA organizer only. This will submit your question for our compilation.

As questions are received, they will be compiled and once the presentation portion is over, the EPA panelists will provide answers to those questions. A specific question will be read to the entire audience followed by an answer or information on how to obtain an answer. If time allows, we will open up the line for the participants to ask questions verbally.

As you are watching the presentation or at any time during the webinar, you can minimize the menu bar on your right by clicking on the orange box with the white arrow located near the top left corner of the menu bar. To expand the menu bar screen again, simply click on the arrow button again.

Lastly, towards the end of the webinar, a poll will be made available. You may elect to take this poll, but you're not obligated to do so. All right. And just as a reminder, we will open up the question – open up the line for additional questions verbally if time allows. Thank you.

Ephraim King: OK. OK. Good to go?

Jim Giattina: Yes.

Ephraim King: OK. Well, good morning, everybody. Again, my name is Ephraim King. I'm Director of the Office of Science and Technology at the U.S. EPA in Washington, D.C. With me this morning is Jim Giattina, the Water Division Director for EPA's Region 4 Office in Atlanta, Georgia, and with Jim this morning are some of his top people, Joanne Benante, Annie Godfrey, Ed Decker and with me this morning I've got some key staff folks here as well.

What we'd like to do this morning is give you an overview of the recently finalized nutrient rules for inland waters in the state of Florida. I want to also give you at the outset a little bit of extra information just so that you know where else you can go. Today's conversation is a summary, but we have an awful lot more information and you should certainly feel free to avail yourself of that.

So the website you might want to think about checking is www.regulation.gov. Then you type in, "docket," "D-O-C-K-E-T-I-D:epa-hq-ow-2009-0596." And on that website, what you'll find is a copy of numeric criteria regulations themselves. You'll find the preamble which explains how they were derived. You'll also find a technical support document which provides you substantial additional technical information and also an economics report on terms of the costs. And finally, some Q's and A's and some general fact sheets.

Now, I'll give you this website number again before we close up, but again, that's sort of a place to go for more general information.

To start off this morning, let me begin by emphasizing one thing that I think Floridians have told us and told each other is a common and very, very powerful commitment which is a commitment to clean and safe water in the state of Florida and their understanding of how essential that is both for public health to each community and also to Florida's economic growth.

When we visited with Florida and Florida stakeholders, almost to the individual, stakeholders agree on the need for numeric standards to meet the goal of clean and safe waters in Florida. I think one of the things we heard was that in addition to that commitment, commenters also and stakeholders also emphasized the need for balance. In other words, how do we do this in a way that is reasonable and cost-effective and allows for appropriate planning and an appropriate next step.

And I think today what you'll agree when we finish it that we have a rule here which provides very clear and numeric targets for what needs to be achieved in terms of loadings reductions to ensure attainment of Florida's existing

nutrient standards and you'll also find that we have a rule here which provides very substantial flexibility and a lot of additional options to allow for site specific consideration where that's supported by underlying science and data.

So let's go ahead and get started. The final rule was signed on November 14th. We expect it to be in the Federal Register Notice some time this week and the months that I'm about to – dates I'm about to give you in a couple of bullets, those dates are all computed from the date that the rule is published in the Federal Register.

So again, to review what's on this overhead, the rule establishes a numeric nutrient criteria to protect Florida's designated uses for freshwater lakes, springs and streams located North of the South Florida region. The South Florida region for purposes of this rule is the part of Florida that is South of the St. Lucie watershed on the East and the Caloosahatchee watershed on the West. That's a geographic extent of the rule.

A key component of this rule that's really important to emphasize for folks at the outset is that the effective date for the numeric standards has been deferred for 15 months. So the numeric standards that are contained in this rule do not become effective until 15 months after the Federal Register promulgation and the only exception to that is that a site-specific alternative criteria provision which allows stakeholders to come in with an alternative criteria if they believe they're warranted, that particular provision will be effective 60 days after the rule is published in the Federal Register.

This rule is the result of a very extensive public comment notice and proposal process. We proposed a rule in November – in January of 2010. We provided three months for comment and we also engaged in 13 public hearing sessions in six different locations in Florida. We received over 22,000 comments. And we read those comments very carefully a number of times and the rule that you see today responds to a number of the very significant and substantial concerns that were raised.

And we're pleased to say that we think the public notice comment process which processes getting feedback and allowing full scrutiny of everything

we've done. We think that's worked very, very well. And the only other general final point I'd make to you is I will get into it in more detail is that this rule, as you'll see, provides very substantial flexibility in terms of how to assure that the numeric goals contained in the rule are achieved.

In terms of schedule and approach, a little bit of background. EPA made a determination in January of 2009 in the previous administration that numeric nutrient standards are needed for the state of Florida. Basically, that determination concluded that Florida's existing nutrient standards, which are narrative in other words they express the goal in terms of words, was a very fine standard, but very difficult to implement because the numeric targets were not measurable and not quantifiable.

So we made a determination in January that numeric nutrient standards were needed. That is a goal, a commitment that FDEP, the Florida Department of Environmental Protection, agrees with and then in June, we entered into a consent decree. In August, we entered into a consent decree to provide that the numeric criteria be proposed in January of 2010 and finalized in November 2010 and that's the rule that just went out a couple of weeks ago.

Now, one additional piece of this phased rulemaking process that you can keep in mind is that today's rule only applies to inland waters. But now, there's a second rulemaking that's under development which applies to estuaries and coastal waters. It'll also apply to South Florida waters and also to simply refer to it as downstream protection values for coastal areas and that rule is scheduled to be proposed in November of 2011 and will be finalized in August of 2012.

A key thing to understand about this rule is that it relies on a very substantial amount of data that has already been collected by the state of Florida - site specific data - Florida specific data and the rule also reflects many of the technical approaches that were developed by Florida Department of Environmental Protection as they have considered how to proceed forward on nutrient criteria.

Now, to get into the meat of the rule, there are basically three key components. One is a set of numeric criteria for lakes. Then we have numeric criteria for streams and then finally for streams – for springs. Turning to lakes, the definition for lakes as you see are slowing moving or a standing body of freshwater. The key here is that a lake does not include a stream, a spring or a wetland. This particular rule classifies lakes in Florida into three groups based on color and alkalinity. That is because of our conclusion based upon the data available to us, that there is a strong correlation between chlorophyll A, which is a so-called response variable and total phosphorus and total nitrogen which are causal variables.

Another important thing to understand about lakes is that while we have promulgated final numbers for lakes, there also is a provision for lake-specific adjustments which we'll get into on the next slide.

What you see in front of you are the three classes of lakes. So the first class of lake is so-called colored lakes which has a Platinum Cobalt Unit rating or PCU rating above 40. For lakes that are colored with that kind of color in them, the applicable standards are .02 milligrams per liter for chlorophyll A, 1.27 milligrams per liter for total nitrogen and for total phosphorus, as you can see, 0.05 milligrams per liter.

Now, the next class of lakes is defined as a clear lake that has high alkalinity. Clear is defined as PCUs equal to or less than 40 PCUs and an alkalinity of over 20 milligrams per liter. And once you see how the bold numbers going across the chart, again, under chlorophyll A, total nitrogen, and total phosphorus. And finally, you have a third class of lake which is clear lakes, low alkalinity.

So again, we defined clarity in terms of PCUs. That would be lakes that are equal to or less than 40 Platinum Cobalt Units with alkalinity of less than or equal to 20 milligrams per liter.

Now, as you look at this chart, take a – take a look and observe that there are – that the key numbers are in bold and those are the numbers – those are the criteria that apply to these three classes of lakes. You'll see under in the total

nitrogen column and in the total phosphorus column, you'll see parenthetical under each of the bolds. That is a range of total nitrogen, a range of total phosphorus and the site-specific provision of this rule allows that on a lake-specific basis you can consider three years of available data and depending on the data available to you, you can adjust the criteria within that range and we can talk about that a little bit further.

But it's another example of the site-specific nature of this criteria. First of all, we divided lakes in Florida into three classes and then within each class, there is a provision to provide for more flexibility.

If we go to streams, the definition of streams is free-flowing predominantly fresh surface water in a defined channel that includes rivers, creeks, branches, canals and the rule divides the state of Florida into five watershed-based regions that reflect geological concentrations. In this case, primarily phosphorus. The approach to streams is somewhat different than from lakes. Streams were derived – the stream criteria derived from field data reflecting the least disturbed streams in the state and those field data were developed for on the basis of five watershed regions.

If we turn to the actual numbers themselves of what you see here on this particular overhead is the five regions themselves. Panhandle West, Panhandle East, West Central Peninsula and North Central and then you see the two columns total nitrogen and total phosphorus that apply to each one of these parts of the state.

And we'll discuss this later, but as I indicated, there is flexibility with regard to the lake criteria. There's also flexibility with regard to these criteria through something called a site-specific alternative criteria process and we'll talk about that in a little bit.

Now, as to implementing these criteria, I think one of the key important points to understand that these criteria are so-called in-stream values. In other words, they represent the EPA's best science judgment as to what level of nitrogen and phosphorus is necessary to preserve the balance of flora and fauna in the immediate area where the discharge is occurring.

One of the other realities and challenges associated with nitrogen and phosphorus pollution is that nitrogen and phosphorus pollution also move downstream and it can have significant impact on downstream waters whether they're lakes or whether they happen to be estuaries and coastal.

To address the second component, the rule provides for something referred to as downstream protection values. That's required under EPA's regulations. And in essence, the rule was significantly changed from proposal to final to allow a flexible approach for determining what the appropriate total nitrogen and total phosphorus levels will need to be, in this case, at the point of entry into a lake.

One of the things we did between proposal and final was we switched from reliance on a model referred to as Vollenweider and in the final rule based on a lot of comment and great feedback, we're now relying on a model referred to as BATHTUB or other models of (inaudible) such as WASP.

The key point is that when you look at a lake and you need to understand what are the concentrations of nitrogen and phosphorus coming into the lake to assure attainment of the lake, there are two or three ways you can calculate what those loadings are. One is to use these models BATHTUB or WASP. Another if the lake is in attainment to simply to recognize that the ambient in-stream levels that are resulting in attainment in the lake are levels that need to be maintained.

And finally, if information is not available, a third way of calculating what the downstream protection values need to be at the point of entry is the lake criteria themselves.

The third area that this rule applies to is springs. Spring is defined as a site at which the ground water flows through a natural opening onto the ground, onto the land surface. This rule establishes a nitrate/nitrite criterion of 0.35 milligrams per liter as an annual geometric mean not exceeded more than once in a three year period.

This value is the same value as proposed by the Florida Department of Environmental Protection when they made their draft regulations available for comment in the fall of 2009. And the rule and this number is based upon substantial laboratory data as well as a number of field evaluations and a number of important literature documents.

So now, let's turn to the issue of implementation. One of the keys to implementation is to have confidence that the numbers we've identified are, in fact, protective of the particular stream reaches and lakes that we're addressing here.

EPA has worked extremely closely with the Florida Department of Environmental Protection to look at all the available sites and data that relates to the state of Florida and we believe that the numbers that are contained in today's rule are reasonable and they are science-based and they are protective.

However, we also recognize that when you classify lakes into three classes or you divide the state up into five regions, it's certainly possible that there may be individual lakes or smaller watersheds where a site-specific alternative criteria may be even more appropriate and more defensible and reflect the site-specific circumstances of that watershed.

To allow for a process to recognize this, the rule contains something referred to as a site-specific alternative criteria process or, in short, something referred to as SSAC. And under this process, what the rule provides is that either Florida Department of Environmental Protection or any other stakeholder can submit to EPA's regional administrator an application requesting the EPA to take a look at the underlying record and available data and science and reach a conclusion that the alternative criteria is justified by the existing data.

This particular process is laid out in the preamble and in essence what we say in the preamble is we provide a process for creating an application providing that information to the regional administrator in Region 4 and then the regional administrator will review it and make a determination as to whether the alternative criteria is supported.

There are three basic approaches to deriving the alternative criteria. The first is simply to follow the same approach that the rule itself is based upon whether it's the stressor response approach for lakes or reference conditions for streams. That same analytical approach used on a lake-specific or a subwatershed specific basis that's appropriate.

A second way is to take a look at existing data reflecting biological, chemical and physical assessments and to create a record to support the conclusion that based on biological, chemical and physical data the stream quality is, in fact, already meeting the state's designated use.

And finally, the third way is to use another scientifically defensible approach protective of the designated use. So one of those three ways, each of them are avenues by which people can provide additional justification and information to the agency to support a site-specific alternative criteria.

And once the EPA receives that application, we will review it, we will put it out for notice and comment and if we believe the alternative criteria are appropriately supported by the underlying science and technical information, then the criteria for that particular stream reach or watershed will be revised.

This approach is available again. Any stakeholder can submit a site-specific alternative criteria application and when that application is submitted to EPA, the same information must be submitted at the same time to the Florida Department of Environmental Protection to ensure that if they have any additional information or comments or input that that can be made available at the same time.

So that's the key implementation tool which provides, I think, significant flexibility, but there are other tools as well. Let's take a look at those. This is a fairly complicated chart, but I think it's important because it sort of lays out in one page an overview of the water quality program and how it operates and what the different pieces are.

So if you look at the left-hand column, you see something referred to as state designated uses. In the case of Florida, Florida had a narrative standard for nutrients which is to assure a balanced aquatic level of flora and fauna. Under

the Clean Water Act, the way the statute works, the way Florida's regulations work, there then have to be criteria which specify what is necessary to assure attainment of that designated use.

And that criteria, the next slide down stating EPA criteria, we have today, or on November 14, we have issued numeric criteria to assure attainment of the state's designated narrative standard. And finally, the third section down, trading and offsets, these are the tools that EPA and the state of Florida, the Florida Department of Environmental Protection, use to implement these criteria.

So first, there's total maximum daily loads, which includes waste load allocations for point sources, and something referred to as load allocations for non-point sources. TMDLs are developed by the state as part of an ongoing process for implementing the new criteria that we'll talk about in a second.

Now, to go to the top of the page again, let me point your attention to the bolded words there under the state designated uses. There are two ways to get increased flexibility. One is a variance, which is a time limited provision which adjusts the state's designated use to reflect circumstances in a particular watershed or in a particular stream reach.

Second, is a – is a – a change to the designated use itself which is a permanent change. Those are both changes to the state's – the state's designated use for the water body or their environmental aquatic target for the water body. Once we move away from designated uses, we then have the issue of well, what are the criteria necessary to assure attainment of the designated use.

In the case of nutrients, today's rule reflects the numeric criteria that EPA believes will assure attainment of Florida's designated use, but under it, you also see the initials SSAC, Site-Specific Alternative Criteria, and that site-specific alternative criteria approach allows for adjustment of the numeric criteria that are contained in the rule today based upon the underlying science and technical justification that may be available.

And finally, let me move your attention over to the lower right-hand corner of the page and turn to another implementation tool which provides for

flexibility. In the case of point sources or discharges to surface water generally through a pipe or something like that, those kinds of sources are issued an NPDES permit and permits under the Clean Water Act generally are issued on a five-year cycle.

And the key here is to understand that permits can come with compliance schedules and those compliance schedules can provide time to do the planning and come into compliance with whatever the relevant limit is for that particular source.

So there's an overview of some of the implementation tools that this rule will provide. Let me now turn to a little more detail about implementation. Among the entities that we want to work with because we think these are the key and critical stakeholders to assure the effective implementation of this rule are industries that discharge nutrients, to lakes and streams, publicly owned treatment works, and waste water treatment systems.

Agricultural operations are a significant and important partner in the state of Florida. Municipal entities who manage storm water runoff and folks who use fertilizer as well as system – septic system owners. The potential implementation measures that are considered under this rule are an upgrade of treatment technologies that come with point sources.

In the case of industries, we took a look at the existing best management protection requirements of the Florida Department of Environmental Protection (which is required for industries discharging to non-attaining waters). In the case of municipalities, if we're talking about urban storm water runoff, the EPA reviewed a number of best management practices currently recommended by the Florida Department of Environmental Protection.

In the case of waste water treatment systems, the EPA and various economic analysts made the assumptions that some municipal systems and perhaps many maybe – may need to upgrade to something called BNR, a Biological Nutrient Removal, but EPA also has the view which is that we do not believe that reverse osmosis or microfiltration will be necessary to assure compliance with this rule.

Now, one of the great things about the rule that I think has really focused a lot of people's attention, and appropriately so, are the economic burden costs associated with the rule. In a time of a very serious economic challenge, it's entirely reasonable to ask the question, "What will the economic burden associated with this rule be?"

There had been a lot of analysis and a lot of statements and assertions regarding this. And so just briefly here, I want to share with you the EPA's analysis of a potential cost associated with meeting the standards in today's rule. These costs basically are associated with assuring attainment of any additional waters that are listed or identified by the state of Florida as impaired as a result of today's rule.

And the cost estimates over a 20-year period are \$135 to \$206 million per year and we calculate that for urban storm water runoff and waste water treatment that basically translates to around \$40 to \$72 per household per year which is pennies – virtually pennies a day. But nonetheless, a significant impact that the EPA is very, very cognizant of and it's one of the reasons why, if we talk a little later, we are investing very heavily both in our continued partnership with Florida, but also with outreach to the stakeholders to be sure that we are creating the most cost-effective and reasonable planning process possible to assure attainment.

These costs are attributed to upgraded treatment and pollution prevention actions. And in the case of agriculture, they reflect an assumption of implementation of best management practices that are already recommended by the state of Florida.

Now, you will see undoubtedly – I mean, I've heard there a number of different cost estimates. Generally speaking, the cost estimates vary depending on the assumptions that you gave to the analysis. Like, for example, if it's a cost estimate of waste water treatment plants, the key question to ask is, "What are the assumptions around the needed treatment? What are the assumptions around the number of facilities affected? Is the facility covered by this rule or possibly may be covered by the upcoming coastal/estuarine rule?"

I think the EPA's fundamental bottom line when it comes to economic analysis is that this rule does represent a significant investment in environmental protection and environmental improvement in the state of Florida to support the – and to continue to drive the state's economic health and prosperity.

Having said that, however, we're fully cognizant that this is a significant burden. And so we will be available and a number of different contacts we work directly with stakeholders to assure that we are working with FDEP to get the most cost-effective and possible approaches possible to get compliance.

A number of questions have come up in the context of this rule and on this point, let me just say to everybody that one of the challenges around doing a federal notice and comment rulemaking is a lot of issues are raised during the rulemaking process which because of the notice and comment process EPA cannot respond to because no final decisions have been made until actually the final rule is published which happened on November 14.

So we're now in a position to have a very full conversation and we hope and we look forward to as many questions as possible about how this rule will be implemented, the process by which we will partner with stakeholders and Florida Department of Environmental Protection to assure the most flexible and thoughtful implementation strategy possible.

So one of the questions that we received is, "How will existing TMDLs be affected?" And the short answer to this is that today's rule does not affect any existing TMDL in the state of Florida. It does not withdraw EPA's approval of any existing TMDLs and it does not impose a time limited requirement for the revision of the – an existing TMDL.

Existing TMDLs remain in place and will be reviewed and updated as part of a normal water body assessment and evaluation process that the Florida Department of Environmental Protection follows.

The next question that we are often asked is, "How will existing permits be affected?" And again, here, existing NPDES permits will not be affected by today's rule. Today's rule does not change any existing permits. Now, as those permits are updated and reissued, they must reflect the requirements of today's rule, but existing permits that are already in place, those are the affect – they reflect the applicable requirements and limits that point sources need to comply with.

And I should say that same point applies to TMDLs, the existing wasteload allocations and load allocations with TMDLs continue in effect until the state of Florida and EPA revise the TMDL or update it. Another question we've asked is, "Will there be accelerated implementation" and I think a really key point to emphasize here is that today's rule is incredibly important because it sets for the first time measurable, quantifiable numeric targets on the amount of nitrogen and phosphorus pollution that water's going to absorb and still meet the designated use established by the state of Florida.

So these numeric values are very, very important, but it's also important to understand they will be implemented over time. There's no immediate emergency or crisis associated with implementing these rules. The rule itself provides for a 15-month delayed implementation. That 15 months was provided to assure that Florida Department of Environmental Protection and EPA Region 4 has a full opportunity to engage with all stakeholder sectors, provide information, answer questions and create a process for reasonable and thoughtful planning and cost-effective strategies for how to assure compliance with TMDLs as they're updated and compliance with permits as they're reissued.

It's also important to point out that while the effective date of the numeric standard is delayed by 15 months to create that timeframe for collaboration and information sharing, even after the 15-month period expires, it's also important to remember that the actual requirements on individual sources are determined and reflected in TMDLs and in permits and that's the process which FDEP will follow as it implements this important water quality rule.

Now, one of the next questions, which is complicated, is, "What affect do compliance schedules, variances and designated uses have?" I think the brief answer here is that these are all tools to assure a maximum flexibility and cost-effective solutions, to the implementation of these rules.

Compliance schedules provide more time, variances provide adjustments in the underlying designated use that we talked about earlier, these are time limited adjustments, but they're very important. And designated usage changes basically reflect the ability of the state under certain limited circumstances to change a designated use if the state determines that the particular use for a particular water body or stream reach is not attainable.

Another question that we've received is, "What happens if I can't meet a permit limit set to equal the criteria?" Again, I will take us back to a bullet above. Permit limits are steps to assure compliance with the applicable criteria, but there are a number of tools in the – in the – in the terms of compliance schedules and other kinds of flexibilities which allow time for a thoughtful and balanced assessments of what steps are necessary to begin to get the loading reductions that are needed.

A final question that really has occupied a lot of folks' attention is, "Why are the various cost estimates so different?" I think this is an excellent question and I think really the reason they're so different, it reflects the nature of the rulemaking process that eventually would change. We put a proposal out in January. People in this state made a number of assumptions about what it would cost to assure attainment of that proposed rule in January.

But the final rule itself reflects at the end of the day what the actual numeric numbers are. And so I think that probably the best thing to do going forward is take a look at the final rule that we're talking about today, take a look at EPA's economic analysis and I think if you do that, what you'll find is you get some good information about the assumptions that we're bringing to the analysis and I think what you'll find is the costs are probably substantially less than a number of folks have indicated, but, again, I would emphasize even having said that that EPA regards this as an important rule and we do

recognize that there's a significant burden on the part of municipalities, counties and governments and point sources and we are very mindful of that.

Now, in terms of schedules, sort of what happens next? A final rule was signed on November 14 of 2010. We expect – I've just been informed today we expect it to be published in the Federal Register this week. I don't, I'm sorry to say, have an exact date for you, but we think this week is probably very likely.

The site-specific alternative criteria provision that I talked about a little bit in this overview, that provision of the rule will take effect in 60 days after the rule is published in the Federal Register. Again, that is a – that is a provision of the rule which provides substantial flexibility and it allows folks with additional technical information and science information about their site-specific or water-specific circumstances, it provides some of them the opportunity to share that information with EPA and to demonstrate why an alternative criteria is appropriate to assure attainment of the applicable designed use.

Now, the remainder of the rule, as I indicated, the numeric standards themselves, will take effect 15 months after publication and, again, let me emphasize for folks that the rule will take effect 15 months after publication. But even at that point it is implemented through the existing water quality standards program that the Florida Department of Environmental Protection implements.

So it'll be implemented through its development of TMDLs and the reissuance or new issuance of NPDES permit limits and the development of BMAPs in accordance with the existing administrative process that the state of Florida follows.

I think one thing that EPA needs to really emphasize as we close down here and turn to questions, but it's really, really important, is our deep, deep respect and our deep appreciation to the experts, to the scientific technical experts at the Florida Department of Environmental Protection. We have worked closely with them. They have been unfailing in their openness to share with

us data and methodologies and the science that they're aware of to support numeric nutrient criteria for the state of Florida, these are experts and committed environmental protection folks who will – EPA will be partnering with as they take the lead to implement this rule in the next year, two or three ahead.

And we are committed to working directly with Florida Department of Environmental Protection over the next 15 months to help people understand how the rule works, to assist affected parties in understanding the final criteria, to evaluate those site-specific criteria requests that I mentioned and to work through implementation issues.

We look forward to a strong and continuing partnership with the Florida Department of Environmental Protection and we've already begun that process with a series of meetings just before Thanksgiving and we'll continue that, of course, through the months ahead.

In addition, EPA technical experts will be providing outreach, technical assistance, additional information and follow-up to questions that you may have. We're looking forward to the next 15 months as a really positive and constructive opportunity to sit down together, understand what the actual environmental nitrogen and phosphorus challenges are that we're facing together and then together work through the most cost-effective and balanced approach to assure attainment of the state nutrient water quality standards.

And so that sums up the rule that we – that has been signed on November 14.