



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 13 1991

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Antidegradation Policy: ONRW

FROM: *WR* William R. Diamond, Director *Fred Penk*
Standards and Applied Science Division

TO: Victoria Binetti, Chief
Program Support Branch, Region III

The national interpretation with respect to the Outstanding National Resource Water (ONRW) provision of the antidegradation policy is that it means no new or increased discharges. The only exception to this is discussed in the preamble to the water quality standards regulation to indicate that States may allow some limited activities which result in temporary and short-term changes in water quality. The preamble further discusses the rationale for why we revised the wording in the ONRW paragraph of the regulation. It clearly indicates that the change was made to allow for these temporary activities to occur and did not extend the notion of "significant" changes to ONRW waters.

It is because of this stricture against new or increased discharges that States are reluctant to designate waters as ONRW and have begun to create what is becoming known as Tier 2 1/2. This is commonly described as protection more stringent than the provisions of Tier 2 but would allow some added pollution that ONRW would not. We are considering incorporating the Tier 2 1/2 idea into the antidegradation policy and we draft proposed amendments to the water quality standards regulation.