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**From:** Groen, Stephanie [stephanie.groen@iowa.gov]  
**Sent:** 8/7/2017 8:49:00 PM  
**To:** Bennett, Tate [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1fa92542f7ca4d01973b18b2f11b9141-Bennett, E]  
**Subject:** Fwd: Iowa antideg  
**Attachments:** Iowa Antideg update Aug 7th (1).docx; Excerpt from the Antidegradation rulemaking responsiveness summary.docx; Region 8 Guidance - chapter 2.pdf; Excerpt - Alabama antideg case.docx

Tate,

Thanks for the update on Corn Oil 1. The time you've already put into that issue is greatly appreciated.

In regards to antidegradation, the below email from our Water Quality Bureau Chief should help provide clarification on the 115% justification question that you posed. What further questions do you have for me on this?

Thanks!

Stephanie

----- Forwarded message -----

**From:** Tack, Jon <jon.tack@dnr.iowa.gov>  
**Date:** Mon, Aug 7, 2017 at 3:30 PM  
**Subject:** Iowa antideg  
**To:** Stephanie Groen <stephanie.groen@iowa.gov>

Stephanie,

Attached are several documents responsive to your request. They are:

1. Iowa Antideg update Aug 7th. This is specifically responsive to the question you raised [regarding the justification for 115%].
2. Excerpt from the Antideg rulemaking .... This is our official response in regard to this issue during the rulemaking.
3. Region 8 Guidance - chapter 2. This was EPA's original model antideg procedure that includes a 110% nonbinding reasonableness test.
4. Excerpt - Alabama antideg case. This is an excerpt from the only court case I can find on this issue of a percentage cost test for antideg.

Let me know if you need anything else. I am available anytime tonight or tomorrow to discuss this with you or with EPA personnel, including the Administrator..

Thanks for your efforts. Let me know if you need anything clarified.



**Jon C. Tack** | Water Quality Bureau Chief  
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