

ENVIRONMENTAL PROTECTION DIVISION

Water Quality Trading Draft Guidance

Meeting 1: Background and framework (draft guidance sections 1-5) July 22, 2021





WATER-QUALITY BASED APPROACH TO CWA

- Promulgated under federal Clean
 Water Act
 - "fishable and swimmable waters"
 - "chemical, physical, and biological integrity"
- Delegated program via Georgia Water
 Quality Control Act





WATER QUALITY STANDARDS

- Designated uses
- Water quality criteria
 - Protect the designated use
 - Narrative and numeric
- Anti-degradation policy
 - Georgia has Tier 2 and Tier 3 waters
 - Anti-degradation analysis required





- >250 streams, lakes, estuaries
- Wetland monitoring
- Biological monitoring
- Fish Tissue monitoring
- Facility compliance monitoring
- Streamflow monitoring at 325 gages
- Groundwater monitoring at 177 wells





- Water Quality in Georgia published every 2 years
 - List of waters supporting and not supporting designated uses
- The total number of assessed waters in the 2020 list is 2,777.
 - 1,153 (42%) are supporting
 - 1,373 (49%) are not supporting
 - 251 (9%) are assessment pending





- TMDLs are developed for waters on 303(d) list
- TMDL = Pollutant budget

$\mathsf{TMDL} = \Sigma \mathsf{WLAs} + \Sigma \mathsf{LAs} + \mathsf{MOS}$



Figure 5. Location of Point Source Discharges

Watershed - LU / LC input for Model Watershed - LU / LC input for Model 25 5 10 Miles Figure 9. Lake Lanier Watershed Land Cover from 2005 GLUT

December 2017



REDUCING POLLUTANT LOADS

- Point sources: permit limits
- Nonpoint sources: partnerships and grants
 - Partnerships: NRCS, RC&Ds, state agriculture agencies
 - Grants: 319(h), NRCS funds, state funds



Implementing Best Management Practices Through the National Water Quality Initiative Increases Dissolved Oxygen in Piscola Creek

Waterbody Improved Because of low dissolved oxygen levels, 25 miles of Piscola Creek were added to the Clean Water Act (CWA) section 303(d) list of impaired waters in 2000. In 2013 the U.S. Department of Agriculture's (USDA's) National Water Quality Initiative (NWQI) designated Piscola Creek a priority watershed for the Natural Resources Conservation Service's Environmental Quality Incentives Program (EQIP) investments in voluntary conservation practices that reduce pollutants from agricultural sources. After investments of over \$1,600,000 in best management practice (BMP) implementation through EQIP, in-stream water quality data collected by Georgia Environmental Protection Division (GAEPD) in 2014 indicated that 13 of Piscola Creek's 25 impaired miles were meeting water quality criteria for dissolved oxygen. Therefore, GAEPD recommended that the downstream 13-mile section of Piscola Creek be removed from the state's list of impaired waters, pending EPA approval of Georgia's draft 2016 Integrated Report.

27.899

Legend

Problem

The Piscola Creek watershed is within the hydrologic unit code (HUC) #031100307 and includes Brooks and Thomas counters as well as the city of Quitman. The segment of Piscola Creek from downstream Whitlock Branch at Ozeil Road to Okapilco Creek near Boston was added to the CVM section 303(d) list for low dissolved oxygen in 2000.

The 13-mile reach of Piccola Creek highlighted in this success story is in the Lower Piccola Creek watershed (41,309 acres) in Brooks County, Georgia, Immediately north of the Georgia–Florida border. The watershed is dominated by agricultural land use, most of which is classified as row crops (29.2 percent). Of the 14,137 acres currently classified as agriculture, approximately 53 percent is imgated by groundwater. Several classified evergreen forests (18.8 percent) appear to be intensively managed for pine and quail plantations (Figure 1).

Watershed partners developed total maximum daily loads (TMDLs), a TMDL implementation plan, and a watershed management plan that recommended implementing specific BMPs to reduce oxygendemanding pollutant loads and bacteria loads from forestry and agricultural sources.



Figure 2. Data collected in 2014 at State Route (SR) 333 show that dissolved oxygen (DO) levels meet the water quality standard.

Partners and Funding

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Using EQIP funds in 2012–2014, NRCS provided \$1,653,432 in funding and advice to producers in Brooks County to install conservation practices such as cover crops, nutrient management, livestock fencing and watering systems, among others, to make a difference to improve water quality. EQIP was originally established under the 1996 Farm Bill and reauthorized in the 2014 Farm Bill. Agricultural producers provided 10 to 50 percent cost share for each eligible practice implemented.

GAEPD performed monthly water quality monitoring and was the lead author on the TMDL implementation plan. Southern Georgia Regional Commission developed the 2014 Pride Branch Watershed Management Plan with financial assistance from GAEPD using CWA section 319(h) funds.

Piscola Creek Watershed is in southern G

Piscola Creek Land Use



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TRADING – MULTISTATE CHALLENGES

- Chesapeake Bay
 - Largest TMDL developed by EPA
 - Pollution diet nitrogen, phosphorus, and sediment
 - State watershed implementation plans and measurable commitments



Figure from Chesapeake Bay TMDL, 2010

- Gulf of Mexico
 - Hypoxia Task Force
 - State nutrient reduction strategies



Distribution of bottom-water dissolved oxygen, July 23 – July 30, 2018. Data source: N. N. Rabalais, LSU & Louisiana Universities Marine Consortium; R. E. Turner, LSU Funding source: NOAA, National Centers for Coastal Ocean Science.



TRADING – OTHER EXAMPLES

- Other TMDLs
 - Long Island Sound Connecticut
 - Exclusively point-point trades
 - In 2008, 100 facilities had participated in trading. Approximately 80 of those were in this program.
 - Boise River Idaho
 - Nutrient offset– Dixie Drain Phosphorus Removal Project
 - Plant upgrades coupled with nonpoint source treatment through constructed ponds





- Lake Weiss TMDL (Alabama) 2008
 - Reduce total phosphorus by 30% at the state line
 - Coosa Basin



Figure from Nutrient Trading in the Coosa Basin: A Feasibility Study, 2013



- TMDLs with explicit references to nutrient trading:
 - Lake Allatoona, chlorophyll a (2013)
 - Savannah River 5R (2015)
 - Carters Lake, chlorophyll a (2016)
 - Lake Lanier, chlorophyll a (2017)









Evaluate the feasibility of point-to-point trading and

nonpoint-to-point trading.

Regional Water Plan

Supports ES, ED,

and WQ goals¹.

WQ19-Evaluate Water Quality Trading



Improved assimilative capacity

ater Qualit ading the same watershed (or non-point

 Non-point source pollutant reductions are frequently less expensive than treatment-plant upgrades. Trading programs can cost-effectively improve water quality.





Regional Water Plan

nproved ssimilative apacity	Consider watershed-based water quality trading program that can complement water-quality regulation.
	 Evaluate regulatory framework that would allow pollutant reduction credits to be obtained from other facilities in the same watershed (or non-point sources like agriculture). Non-point source pollutant reductions are frequently less expensive than treatment-plant upgrades. Trading programs can cost-effectively improve water quality.
	Consider wetlands/stream banks mitigation projects, if beneficial to water quality.



- 319(h) and state seed grant funded projects:
 - 2013 Development of a Nutrient Trading Framework in the Coosa River Basin: A Feasibility Study of Nutrient Trading in Support of Lake Weiss TMDL
 - 2015 Model Nutrient Monitoring and Implementation Plan for Soque River Watershed and Coosa-North Georgia Water Council
 - 2016 Pilot Nutrient Trading Monitoring Project (City of Calhoun)
 - 2017 Alternative Nutrient Permitting Strategy Development for the Coosa-North Georgia and the Savannah-Upper Ogeechee Water Planning Regions



SUMMARY OF THE 2019 TRADING STAKEHOLDER WORKSHOPS

- September 20, 2019, GAEPD published a Water Quality Trading Fact Sheet and announced a series of three stakeholder workshops to discuss the development of a nutrient trading framework.
- GA EPD held three stakeholder workshops: one in Dry Branch on October 16, one in Atlanta on October 23, and one in Calhoun on October 28.
- Workshop format:
 - First half: introductions, a preliminary survey to gauge baseline knowledge and perspective, and a short presentation about water quality trading.
 - Second half: small group discussion, large group discussion, and final comments and questions.



STAKEHOLDER WORKSHOP CONCLUSIONS

- Both credit producers and credit buyers expressed concerns and cautious optimism on the concept of trading.
- Key areas of concern included:
 - Preventing hot spots,
 - Verifying BMP benefits (monitoring versus modeling),
 - Ensuring equity in who bears the costs,
 - Engaging stakeholders throughout the framework development process, and
 - Building a workable system, one that is simple to use while still protecting water quality.
- Following these workshops, EPD pulled together an internal workgroup to develop a full draft guidance document building on the previous 319(h) and seed grant work, TMDLs, and stakeholder workshops.



Preventing and addressing water quality degradation is a difficult ecological, economic, and regulatory challenge that requires states and communities to rely on a diverse set of tools and strategies. Water quality trading is one tool that can be used to protect and restore Georgia's waterways. Water quality trading generally involves the opportunity to earn water quality credits based on pollution reductions beyond those already required by law or regulation. These credits can be purchased by another entity to achieve less costly pollutant reduction than if the entity acted alone. The trade ultimately transfers an equal or greater water quality benefit to the receiving water, as measured by pollutant load reductions. This document provides a framework for the implementation of Georgia's water quality trading program.

2. GUIDING PRINCIPLES FOR WATER QUALITY TRADING

Water quality trades must be consistent with the federal Water Pollution Control Act (CWA), the Georgia Water Quality Control Act, the Georgia Rules for Water Quality Control, and other relevant state and federal water quality regulations and implemented in a manner that:

- 1. Does not cause or contribute to violations of instream water quality standards;
- 2. Is consistent with antidegradation policies;
- 3. Provides accountability to confirm that agreed upon water quality benefits are delivered;
- 4. Results in long term protection or improvement in water quality;
- 5. Increases the pace and scale of restoration and attainment of water quality standards;
- 6. Assists in implementing Total Maximum Daily Loads (TMDLs) and attainment of water quality standards; and
- 7. Results in improved economic efficiencies in achieving water quality goals.

2. GUIDING PRINCIPLES FOR WATER QUALITY TRADING

In addition, trading must be consistent with the following guiding principles:

- 1. Be grounded in sound science;
- 2. Effectively accomplish regulatory and environmental goals;
- 3. Improve regulatory and economic outcomes;
- 4. Contain mechanisms for transparency and accountability that allow the Georgia Environmental Protection Division (EPD) and interested stakeholders to confirm that required water quality improvements are delivered; and
- 5. Not create localized adverse impacts to water quality.



The Environmental Protection Agency (U.S. EPA) has stated that the CWA provides authority for a variety of programs and activities to control pollution, including trading programs. The CWA and federal regulations provide authority to incorporate provisions for trading into National Pollutant Discharge Elimination System (NPDES) permits, TMDLs, and other EPD plans. This guidance is designed to ensure water quality trading in Georgia is consistent with the statutes, rules, and regulations that authorize implementation of the CWA in the state.



4. TRADING FRAMEWORK

Trading is implemented through a NPDES permit. Water quality trading may be used by Georgia NPDES permit holders to comply with water quality-based effluent limitations (WQBELs). All trades will involve at least one point source credit purchaser. EPD is not contemplating trading exclusively between two or more nonpoint sources. The NPDES permits provide permit limits and identify, as necessary, compliance schedules, antidegradation provisions, anti-backsliding provisions, and related federal provisions. The NPDES permits will incorporate a trading plan as a permit condition that contains details on implementing trades (see Appendix B for more information about trading plans).



- 1. Point-Point: Trades between two or more permitted point sources where at least one permittee agrees to reduce the discharged pollutants beyond baseline levels. The permitted point sources can be owned by the same entity or by different entities.
 - a. Trades between point sources owned by the same entity. If the permitted point sources are owned by the same entity, the permitted point sources will have permits reflecting the specific trades and containing all necessary conditions. In this scenario only, the entity will not be required to develop a trading plan; however, the guidelines outlined in this document will still apply. The entity will use the permitting process to provide relevant information, such as the trading area, to EPD for review and approval. Information about the proposed trade will be made available to the public through the public process associated with permit issuance.



- 1. Point-Point: Trades between two or more permitted point sources where at least one permittee agrees to reduce the discharged pollutants beyond baseline levels. The permitted point sources can be owned by the same entity or by different entities.
 - b. Generating credits. A point source can generate credits by reducing their discharge, either through a reduction in pollutant concentration or through a reduction in volume discharged or both. Credits can only be generated by a real reduction in pollutant loading from the baseline conditions (see section 5.4.1 for more information about trading baselines). Credits cannot be stockpiled; they must be used in the year they are generated.
 - c. Buying credits. A point source can purchase credits generated by another point source located within the same trading area for the same time period, provided the purchasing point source's discharge does not cause adverse localized impacts, such as harmful algal blooms or mussel toxicity. Credits cannot be stockpiled; they must be used in the year they are generated.
 - d. Responsibility. Each point source is responsible for ensuring its discharge, adjusted by traded credits, meets its individual effluent limit. A pollutant trade does not relieve the responsibility of an NPDES permittee to comply with the terms of its permit.



- 2. Point-Nonpoint: Trades between at least one permitted point source and one or more nonpoint sources that are reducing or plan to reduce their nonpoint pollutant loads beyond baseline levels;
 - a. Planning. Many nonpoint source credits will be generated through the installation or implementation of new Best Management Practices (BMPs). Because these BMPs have not yet been installed or implemented, measuring realized load reductions will not be possible. In these scenarios, EPD requires the use of the STEP-L model to estimate the number of credits that will be generated. These estimates will be used in the development of a trading plan. Please note that STEP-L model results are only for planning purposes. Credits are only generated after the BMP is installed and load reductions occur. After BMP installation, the credits generated will be measured with monitoring.



- 2. Point-Nonpoint: Trades between at least one permitted point source and one or more nonpoint sources that are reducing or plan to reduce their nonpoint pollutant loads beyond baseline levels;
 - b. Generating credits. A nonpoint source creates a tradeable credit by implementing a trading project and measuring and documenting the resulting pollutant reduction consistent with a trading plan. As with point-point trades, credits must be consistent with NPDES requirements to be applied towards compliance with the point source's effluent limit. The credit amount is equal to the load reduction beyond baseline conditions. Several monitoring approaches may be used to quantify load reductions, including upstream/downstream monitoring, pre- and post-installation monitoring, BMP monitoring, or edge of project area monitoring. Credit-generating projects cannot include actions required by another NPDES permit (including compliance schedules), law, regulation, ordinance, or TMDL. Credits cannot be stockpiled; they must be used in the year they are generated.
 - c. *Buying credits.* A NPDES permittee may maintain or increase its actual pollutant discharge for a given time period by purchasing credits generated by a nonpoint source located within the trading area. Credits cannot be stockpiled; they must be used in the year they are generated.
 - d. Responsibility. When nonpoint source reductions are used to offset point source discharges, the point source retains full responsibility for the quantity and delivery of the credits purchased from the nonpoint source. The point source must ensure not only that the trade transaction is completed, but also that the nonpoint source credit generator has fulfilled their obligation and generated the expected credits. A pollutant trade does not relieve the responsibility of an NPDES permittee to comply with the terms of its permit.



- 3. Offset projects: similar to a point-nonpoint trade, however, in an offset project the permitted point source implements the nonpoint source project. The point source is expected to perform monitoring to the same level specified for nonpoint source credit generators to document credit generation.
- 4. Other types of trades approved by EPD on a case-by-case basis.

4.2 TRADING REQUIREMENTS – WATER QUALITY

- 1. Localized impacts must be avoided. If a discharge causes localized impacts that exceed narrative or numeric water quality criteria, a discharger may be deemed in noncompliance with the CWA and the Georgia Water Quality Control Act.
- 2. Any activity conducted to generate credits for trading must be consistent with Georgia's antidegradation policy. Under Georgia's antidegradation policy, trades cannot lower the existing quality of a water body.
- 3. Trades cannot authorize backsliding unless one of the exceptions in CWA §402(o) and 40 CFR §122.44(I) applies. Anti-backsliding generally prohibits the renewal, reissuance, or modification of an existing NPDES permit that contains effluent limitations, permit conditions, or standards that are less stringent than those established in the previous permit. Trading to meet water quality standards with a less stringent effluent limitation is not backsliding, provided the permittee is responsible for the same level of pollutant reduction.

4.2 TRADING REQUIREMENTS – CREDIT USE

- 4. A credit cannot be traded before it is generated through a pollutant reduction.
- 5. Once a credit is traded, the same load reduction cannot be traded again, even if for another purpose.
- 6. The same load reduction on the same area of land cannot be sold to offset the impacts of two different credit buyers.

4.2 TRADING REQUIREMENTS – VERIFICATION

- 7. Mechanisms used to verify project implementation and performance may include site inspections, project review and certification, monitoring, trade information tracking (registry), and recordkeeping and reporting.
- 8. Verification of trading project performance must be conducted by a qualified professional. Additional verification may be required by EPD based on results of periodic trading plan reviews and other compliance activities.
- 9. If EPD or the permittee determines a trading project is not producing the expected reduction, the credit for that time period may be nullified or reduced, and the permittee's effective discharge adjusted accordingly.



4.2 TRADING REQUIREMENTS – WQBELS

10. Water quality trading may **not** be used to meet federal secondary treatment requirements or Technology Based Effluent Limits (TBELs) as defined in the CWA unless expressly authorized by the underlying effluent guidelines. Trading may be used for WQBELs, where appropriate.

Point sources may use trading to meet effluent limits in both the short-term and long-term. While trading is often contemplated as a long-term tool for achieving efficient water quality benefits, under certain circumstances, point sources may wish to engage in trading on a temporary or short-term basis. EPD will evaluate the proposed duration of trading during the evaluation of the trading plan.



5. CONDITIONS FOR ELIGIBLE TRADES

This section identifies who can participate in trading, which water quality parameters can be traded, where can trading occur, and how is trading implemented.



5.1 WHO CAN PARTICIPATE IN TRADING?

Trading participants may include:

- municipal or industrial NPDES permittees,
- farms,
- mitigation banks,
- conservation organizations, or
- others EPD determines to be qualified to participate in trades.

5.2 WHICH WATER QUALITY PARAMETERS CAN BE TRADED?

Water quality parameters eligible for credit trading include

- Nitrogen,
- Phosphorus,
- Oxygen-demanding substances
- Others may be approved by EPD on a case-by-case basis, such as sediment

Pollutants with the potential to threaten public health directly, such as toxins, metals, or bacteria, will **not** be considered for trading.



5.3 WHERE CAN TRADING OCCUR?

Discharges to the following water bodies are eligible for credit generation and trading. The categories identified correspond to the water bodies' water quality listing assessment in Georgia's Water Quality in Georgia report, available on EPD's website.

- 1. Water bodies in attainment of their water quality standards (Category 1), both those that are not covered by a TMDL and those that are covered by a TMDL;
- 2.Impaired waters pending a TMDL (Categories 5 and 5R);
- 3.Impaired waters with a TMDL (Category 4a); and
- 4. Water bodies where a TMDL alternative, an EPD-approved Water Quality Management Plan, or an EPD-approved Watershed Protection Plan are incorporated in a point source NPDES permit.

Please note that discharges to Tier 3 outstanding natural resource waters or Tier 2 high quality waters with scenic river and/or wild river designated uses are not eligible for water quality trading.



5.3.1 DEFINING A TRADING AREA

Trading areas establish the geographic boundaries within which trades can occur and specify a defined point where water quality goals must be met. The permittee must delineate a trading area in such a manner that fully addresses the risk of localized or downstream water quality impairments or negative impacts. The proposed trading area will be submitted to EPD for review and approval in the trading plan. Because the trading area significantly affects all aspects of the trading plan, EPD strongly recommends parties interested in trading schedule an initial trading meeting with EPD for preliminary review and approval of the proposed trading area (see section 9.1 and Appendix B for more information).





5.3.1 DEFINING A TRADING AREA

Trading areas must be:

- 1. Clearly delineated in the trading plan, including a description and map of the trading area.
- 2. Consistent with the water quality objectives of any applicable TMDL, TMDL alternative, or other EPD-approved plans.
- 3. Delineated such that pollution reduction in one part of a watershed can be linked to water quality improvement at a point of concern. Generally, inter-basin trading is inappropriate, but EPD may approve such a trade in specific, scientifically defensible situations.

5.3.1 DEFINING A TRADING AREA

- 4. Delineated such that the point of discharge is upstream of the point of concern.
 - a. Trading areas may extend downstream of the NPDES discharge or most downstream location of nonpoint source loading, provided that the point of discharge or area of nonpoint source loading is upstream of the point of concern (option A).
 - b. Trading areas may be established upstream of the point source discharge location if needed to prevent the potential for localized impacts developing above the point of concern (option B) or,
 - c. Within small watersheds, the trading area may be established at a different place downstream to protect a sensitive waterbody, such as a lake or estuary (option C).





5.4 HOW IS A TRADE IMPLEMENTED?

Point and nonpoint sources can implement trading projects to generate credits. Only projects implemented after a trading baseline is established are eligible to generate credits. Specific information about trading baselines and trading projects is provided in this section.



5.4.1 TRADING BASELINES

A trading baseline is a snapshot of the conditions within the trading area coupled with legal requirements at the time of the waterbody's assessment. Establishing a baseline is necessary to quantify the current pollution loading to the receiving water from specific sources. These data can then be used to quantify the credits that can be generated through various trading projects. EPD will establish trading baselines for each proposed trading area using:

- 1. Any applicable pollution control requirements that need to be implemented to meet baseline requirements prior to generating credits. BMPs required to meet baseline requirements and BMPs used to generate additional water quality benefits and credits may be installed simultaneously. For nonpoint source projects in watersheds where a load allocation (LA) reduction is required to meet the TMDL, a portion of the pollutant reduction may be available as credits for trading. EPD will determine the specific portion based on the required LA reductions in the TMDL.
- 2. Federal, state, and local regulations that establish requirements for the project.
- 3. A selected baseline year that specifies when credit-generating activities begin. Typically, the baseline year will not be earlier than the year of NPDES permit issuance that authorized the trading plan.



5.4.1 TRADING BASELINES

Baseline requirements will be developed for a specific watershed and applied to the individual sites intended for credit generation. EPD may choose to modify a trading baseline to comply with a TMDL, a TMDL alternative, an EPD-approved Water Quality Management Plan, or an EPD-approved Watershed Protection Plan incorporated in a NPDES permit. Only projects implemented after the baseline year is established are eligible for generating credits.



5.4.2 TRADING PROJECTS

Not all project types may necessarily generate credits, and some project types might not be eligible for inclusion in a trading plan. The following are not eligible to generate credits:

- 1. Activities that generate a pollutant load greater than current conditions. Projects must generate pollutant reductions beyond current conditions to be eligible for credit generation.
- 2. Activities already required by federal, state, or local regulation.
- 3. Activities required to make a site eligible for NRCS (Farm Bill) assistance, including actions taken to ensure compliance with wetlands and highly erodible land conditions.

EPD will consider various factors to evaluate the appropriateness of trading projects, such as whether the project reduces the pollutant load and improves water quality and whether an adequate method exists to document the reduction generated from the project. More information about trading project evaluations is provided in Section 8.0 and Appendix B.





• Thursday, August 19, 2021, from 1 to 3 P.M.

This meeting will focus on the implementation specifics (trading plan development and permit language) related to the framework outlined in sections 1-5 of the draft document. These implementation specifics are housed in Appendices B and C.

• Thursday, September 16, 2021, from 1 to 3 P.M.

This meeting will focus on a discussion of sections 6-11, which are primarily concerned with credit generation, tracking, and compliance and enforcement.

• Thursday, October 14, 2021, from 1 to 3 P.M.

This meeting will serve as a wrap-up discussion summarizing the stakeholder process and feedback received by EPD, answering open questions, closing out any items that required additional information, and describing next steps.



Questions or comments

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Written comments may be **sent to EPDComments@dnr.ga.gov** or mailed to Environmental Protection Division, Watershed Protection Branch, Suite 1152 East Tower, 2 Martin Luther King, Jr., Dr., Atlanta, GA 30334.

If you choose to e-mail your comments, please include the words "Water Quality Trading" in the subject line to help ensure that your comments will be forwarded to the correct staff.