

Koch, Ken

0310

From: Cooper, Betsy [Betsy.Cooper@METROKOC.GOV]
Sent: Tuesday, November 30, 2004 8:32 AM
To: Braley, Susan
Cc: Brown, Chad (ECY); Koch, Ken; Stark, Kimberle; Simmonds, Jim
Subject: 0310-RE: DO listing on new Draft Cat 5
Follow Up Flag: Follow up
Flag Status: Flagged

Susan,
Thanks much (sorry for the email address, I will note the right one!).
The specific IDs that caught our attention on the DO were:

38765
38769
42486
42479
42478
42490
42480
42484
10167
42481
42482
42483

What also caught our attention was that there are what appear to be inconsistencies in the calls in waters grids that are adjacent to each other. Examples of that would be:
38650 near foulweather bluff at the mouth of Hood Canal is a Cat 2 when 38765 around the point in PS in a more open area is called a Cat 5. And water grids in Miller Bay are all identified as Cat 2 when PS in the same area is identified as a Cat 5. So those are examples of a concern for consistency in calls.

-----Original Message-----

From: Braley, Susan [mailto:SUBR461@ECY.WA.GOV]
Sent: Monday, November 29, 2004 2:54 PM
To: 'betsy.cooper@metrokc.gov'
Cc: Brown, Chad (ECY); Koch, Ken
Subject: FW: DO listing on new Draft Cat 5

Hi Betsy--Thanks for the note, I am including Chad Brown on this email (he has been involved in the technical assessment of data). We'll take a look at the D.O. listings and also have our marine unit take a look. I know D.O. is often a naturally occurring event in marine waters so it's certainly possible things slipped through.

If you have some specific listing ID's you are particularly concerned about, send them our way.

Thanks--Susan

p.s. You have the wrong email address for me, so just a note to make that correction in your email address book.

-----Original Message-----

From: Bragg, Susan
Sent: Tuesday, November 23, 2004 7:26 AM
To: Braley, Susan
Subject: FW: DO listing on new Draft Cat 5

Susi Bragg
Human Resource Consultant

12/22/2004

Employee Services

360-407-6189

-----Original Message-----

From: Cooper, Betsy [mailto:Betsy.Cooper@METROKC.GOV]

Sent: Monday, November 22, 2004 4:33 PM

To: Bragg, Susan; Gildersleeve, Melissa

Cc: Peeler, Dave; Stark, Kimberle; Simmonds, Jim; Shuman, Randy; 'Ed Thorpe'

Subject: DO listing on new Draft Cat 5

Susan and Melissa,

I am sorry I was not able to attend the WQ Partnership meeting last week but understand a fair amount of time was spent discussing natural condition calls regarding Temperature in the recent Category 5 list. The natural condition issue I would like to bring to your attention however, is a different one - the listing of many Puget Sound sites for DO based on water column DO data that are low because of the typical estuarine oceanographic feature of cold, saline water movements, not DO impairment.

The newest listings appear to take all the KC routine Puget Sound monitoring sites and list them - even mid-sound sites. In first round of commenting on the first draft list, KC had commented on some sites where this issue appeared to drive listing. In the second round, additional newer KC data has similarly been interpreted as impairment resulting in additional listings. However in other places where other commenters had raised the same issue (Kitsap county, Everett) some natural condition calls were made in the second round, others were not.

The concern is two fold:

- 1) The appearance that the Ecology listing process is not taking into account some basic oceanographic principals that should logically apply to the interpretation of DO data in Puget Sound resulting in many incorrect DO listings in marine waters,
- 2) The potential for imposition of restricting on current and future marine discharge permits based on DO impairments that on their face, do not represent impaired waters.

King County is aware that EPA is requiring Ecology to support their natural condition calls. These natural condition calls regarding DO in deep PS waters seem to be reasonably made based on basic oceanographic principals and the long data records available. We know that you are looking at a number of issues now on the list. We would be happy to talk with you further on this basic data interpretation issue.

thanks much,

Betsy Cooper

NPDES Administrator

Wastewater Treatment Division

King County Department of Natural Resources and Parks

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