

<b>Comment #</b>	<b>Listing ID</b>	<b>Comment</b>
1	General	Place all data used for assessments that are not uploaded to EIM in an FTP site or give complete references in order to allow reviewers ready access to all assessment data. It is difficult to give comments on data to which we have little to no access.
2	General	Please note that all fecal coliform samples collected on 4/7/08 as part of User Study ID: G0500151 exceeded the holding time. Please remove these data from EIM. Documentation attached.
3	General	Upon reviewing the lab reports, COC's and bench sheets for the Project ENVVEST data, we believe that some of the samples exceeded the holding times. Specifically, we are concerned about the following: ENV-BI-FWNS (11/7/02); ENV-BI-FWSW (11/7/02 & 12/16/02); and ENV-BI-LCSW (11/7/02). Please review the attached documentation. On the EPA benchsheet, or Laboratory Data Record, the analyst annotated a "J" next to the count in the final column. This is particularly important, since the ENV-BI-FWNS data resulted in a 303(d) listing for that location (Listing 45321-see our comments below). Upon removal of that data value, the rest of the data meet the criteria and do not result in either category 2 or 5 listing. PLEASE NOTE: City of Bainbridge Island staff wrote the "J"s on the COC's for reference only.
4	45271	KIT031A, KIT031B, AND KIT031C are multiple samples taken within the same area (BEACH ID: WA381199) in agreement with WAC 173-201A-210.3.b.ii when assessing sensitive areas such as swimming beaches. Therefore, in accordance with WAC 173-201A-210.3.b.ii, the 2006 fecal coliform data for these three locations should be arithmetically averaged together as was done with the enterococcus data.
5	45271	Regarding Location IDs [BI-NS6],[BI-NS1] 2008 fecal coliform assessment: Through reviewing lab reports for the Bainbridge Island Water Quality and Flow Monitoring Program (User Study ID G0500151), it was discovered that the 4/7/08 sample for BI-NS1 exceeded the holding time. Please remove this sample from your assessment and from EIM. Lab report and COC is provided.
6	45271	Regarding BEACH ID [WA381199] 2006 enterococcus assessment: geometric mean is 43.1, not 42.1.

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7	10254	WAC 173-201A-210.1.d.iii states that "samples should not be taken from shallow stagnant backwater areas, within isolated thermal refuges, at the surface, or at the water's edge." <i>Listing 10256</i> for temperature in this same sampling location (EAG001) states "This listing was reviewed by Department of Ecology Coastal and Estuarine Assessment Unit staff [see Grantham memo 4/2005, attachment (d)], who concluded that these exceedances are a natural condition and there are insufficient human influences in this area to produce significant temperature increases. This listing is from a small and/or shallow enclosed or semi-enclosed waterbody which is subject to substantial increases in natural thermal warming." Further, according to the location reported and mapped in EIM, sample appears to be taken from shallow water (<0.5 m) and at the water's edge. Therefore, there should be no listing for dissolved oxygen for this sampling location.
8	10254	Data used for listing basis is from User Study ID LTMWWY98 - Long Term Marine Water Monitoring from WY1998. These data do not meet the data credibility requirements for the following reasons: 1. The QA/QC level listed for this data in EIM is Level 1 - Data neither verified nor assessed for usability, 2. Data is older than 10 years old.
9	10254	Regarding Location ID [LTMW36] 1998 dissolved oxygen assessment: EIM data listed for LTMW36 (minimum measurements shown for each day) are 7.3, 7, 9.1, 11, 10, 11, 8.4, 9.1, and 6.3. WAC 173-201A-210(1)(d)(ii) states that concentrations are not to "fall below" the criteria..." It does NOT state that it has to "exceed" the criteria, in this case 7.0 mg/L. Therefore, there is only one excursion of the criteria for this waterbody.
10	10254	Basis citation references Newton et al. (1998) Dept. of Ecology Ambient Monitoring Station EAG001 (Eagle Harbor -Inner), stating that this data set shows 4 excursions beyond the criterion out of 11 samples collected between 1993 - 2000. How can this referenced data set report data for 1999 and 2000 when it's publication date is 1998?
11	10254	Regarding Newton et al. (1998): If Ecology has data from 1993 to 2000, why is this data not entered into EIM? When we searched by the location name, EAG001, we only found the 1997 and 1998 data. Further, this citation does not give enough information for us to locate the referenced data. Without reviewing the Newton et al. data, we cannot comment on whether we agree with the statement "shows 4 excursions beyond the criterion out of 11 samples collected...". As a category 5 listing requires a minimum of 3 excursions and the 1997 and 1998 data only show 2 excursions, it is important to review the Newton et al. data.

Comment #	Listing ID	Comment
12	45321	ENV-BI-CSNS is mapped in the wrong location. CSNS = Crystal Springs Nearshore is located along the southwestern shoreline of Bainbridge Island adjacent to Port Orchard Passage, a completely different waterbody. The correct location, as reported by Melva Hill, Water Resources Engineer for City of Bainbridge Island and the person who actually collected the samples, is Lat: 47.59844349 and Long: 122.5756721. Map showing correct location is provided.
13	45321	ENV-BI-FWNS is mapped in the wrong location. FWNS = Fort Ward Nearshore which is located at the southernmost tip of Bainbridge Island adjacent to Rich Passage. The correct location, as reported by Melva Hill, Water Resources Engineer for City of Bainbridge Island and the person who actually collected the samples, is Lat: 47.57622749 and Long: 122.5237422. Map showing correct location is provided.
14	45321	Upon reviewing the lab reports, COC's and bench sheets for the ENV-BI-FWNS data, we believe the 11/7/02 sample exceeded the holding time. On the EPA benchsheet, or Laboratory Data Record, the analyst annotated a "J" next to the count in the final column. It is our understanding that this means that the sample exceeded the holding time. We are attaching our documentation and request that this sample be removed from the assessment. The remaining data that met the holding times meet the criteria and do NOT result in a category 2 or 5 listing.
15	45857	The data for BI-NS5 are only targeted storm event data as reported by Cami Apfelbeck, Water Resources Specialist and manager for study G0500151 with City of Bainbridge Island. It is our understanding that the assessment policy stipulates that storm event data can only be used IF part of a larger, ambient data set for that location.
16	60190	Regarding Location ID [BI-NS2] 2008 fecal coliform assessment: Through reviewing lab reports for the Bainbridge Island Water Quality and Flow Monitoring Program (User Study ID G0500151), it was discovered that the 4/7/08 sample for BI-NS2 exceeded the holding time. Please remove this sample from your assessment and from EIM. Lab report and COC is provided.
17	45704	Regarding Location ID [ENV-BI-SBC] 2004 fecal coliform assessment: It appears that your geomean and percent calculations used the highest result for each sampling event. According to WAC173-201A-200(2)(b)(ii) and DOE's WQP Policy 1-11 results for duplicates for a given sampling event should be arithmetically averaged for one result value. Using averages, the results for BI-SBC should be 4/19/04 (83.5 CFU), 5/25/04 (250 CFU), 5/26/04 (1057.5 CFU), 10/18/04 (225 CFU), and 10/19/04 (422.5 CFU). Therefore, the citation should read, "Location ID [ENV-BI-SBC] -- 4 of 5 (80.0%) of samples collected in 2004 exceed the percent criterion (100 col/100 mL). The geometric mean of 291.3 col/100 mL exceeds the geometric mean criterion (50 col/100 mL)."

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18	45704	Why does this listing not include 2008 data reported for this location by the Bainbridge Island Water Quality and Flow Monitoring Program (Location ID: BI-SW3; Study ID: G0500151)? Those data are 10/13/08 (13 MPN), 11/10/08 (13 MPN), 11/12/08 (300 MPN), and 12/2/08 (30 MPN). These data are currently in EIM.
19	64700	Recommend clarifying if the value exceeded the acute or chronic toxicity criteria.
20	10256	Regarding Newton et al. (1998): If Ecology has data from 1993 to 2000, why is this data not entered into EIM? When we searched by the location name, EAG001, we only found the 1997 and 1998 data.
21	40132	According to WQP Policy 1-11, waterbody segments that are well within the classification standards for bacteria as described in the DOH Annual Shellfish Growing Area Review will be placed in Category 1. The listing references one exceedance in 2007 as the basis for listing. However, the 2008, 2009, and 2010 DOH Annual Shellfish Growing Areas assessments determined that this area is well within the classification standards. Therefore, this should be a Category 1 listing.
22	65355	Listing states that 2 out of 10 samples for 2008 exceeded 13 degrees C. We could only find 8 values listed for 2008 of which, none exceeded 13 degrees C.
23	38855	The mapped location for KITSAPWQ location KCHD-PS22 appears to be inside the mixing zone for the Kitsap Sewer District 7 WWTP. Further, the area surrounding the mixing zone lies within the Bainbridge South Shellfish Growing Area. The 2010 DOH Annual Shellfish Growing Area assessment determined that this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
24	40141	WA DOH marine station 438 referenced in this listing basis lies within a portion of the Port Orchard Passage Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
25	40143	WA DOH marine station 440 referenced in this listing basis lies within a portion of the Port Orchard Passage Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
26	40144	WA DOH marine station 441 referenced in this listing basis lies within a portion of the Port Orchard Passage Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.

<b>Comment #</b>	<b>Listing ID</b>	<b>Comment</b>
27	40152	WA DOH marine station 449 referenced in this listing basis lies within a portion of the Port Orchard Passage Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
28	40153	WA DOH marine stations 450 and 457 referenced in this listing basis lie within a portion of the Port Orchard Passage Shellfish Growing Area that is currently approved for shellfish harvest. Further, the BINS3 site lies within an area currently (as of 2009) classied as "Unclassified" only because no requests for harvest have been received. The 2010 DOH Shellfish Growing Area assessment determined this whole area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
29	40155	WA DOH marine stations 452 and 456 referenced in this listing basis lie within a portion of the Port Orchard Passage Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this whole area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
30	38396	Have no access to data to review.
31	48990	Values reported for the study referenced in this listing are given in mL/L. The WAC173-201A criteria is set in mg/L. Please review this assessment.
32	38856	WQP Policy 1-11 states that Ecology will review the last five years in which pH data exist for the waterbody segment. The data referenced in this listing are from 1996-2001. However, we do not have access to the data to verify that the excursion was in the last five years of the data.
33	40106	WA DOH marine stations 414 and 420 referenced in this listing basis lie within a portion of the Port Blakely Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
34	40107	WA DOH marine stations 415, 416, 418, and 419 referenced in this listing basis all lie within a portion of the Port Blakely Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
35	40109	WA DOH marine station 417 referenced in this listing basis lies within a portion of the Port Blakely Shellfish Growing Area that is currently unclassified for shellfish harvest. However, the 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.

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36	40131	WA DOH marine station 515 referenced in this listing basis lies within a portion of the Port Madison Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.
37	40135	WA DOH marine station 519 referenced in this listing basis lies within a portion of the Port Madison Shellfish Growing Area that is currently approved for shellfish harvest. The 2010 DOH Shellfish Growing Area assessment determined this area is well within the classification standards. Therefore, this should be a Category 1 listing in keeping with WQP Policy 1-11.



**Attachment 1:  
Corrected Bainbridge Island Sampling Locations  
Project ENVVEST**



0 500 1,000 2,000 3,000 4,000 Feet



April 10, 2008

City of Bainbridge Island  
280 Madison Ave  
Bainbridge Island, WA 98110

**Project: Water Resources**  
**Sample Date: 4/7/08**

**Lab Work Order#: 85478**  
**Sample Received: 4/8/05**

**Report on Analysis**

**Fecal Coliform**  
**Method: SM 9221 E**  
**Date Analyzed: 4/8/08**

<b>Sample ID</b>	<b>Lab No.</b>	<b>Result, MPN/100ml</b>
OFL	85478-01	2
Murden Cove	85478-02	13
BMP	85478-03	4
Murden Creek	85478-04	8
Ravine Creek	85478-05	23
Ravine Bridge	85478-06	30

Note: Samples were over the holding time when received and set

Approved for Release,

Steve Twiss  
President

WDOE Accreditation #C1316

This report is issued solely for the person or company to whom it is addressed. This laboratory accepts responsibility only for the due performance of analysis according to industry accepted practice. Twiss Analytical Laboratories, Inc. or its employees are not responsible for consequential damages in any kind or in any amount.







ENVIRONMENTAL LABORATORY

LABORATORY DATA RECORD

FECAL COLIFORM

Envvest

Collected by \_\_\_\_\_ Study: \_\_\_\_\_

Station	Lab. No.	Sampling Date	Analysis Date by/time	Colonies Counted by/time	Blue Colonies per					Count per 100 mL	
					10	25					
	0245		11/8/02	11/9/02	10	25					
	0580	11/7/02	8A	8A	9	82					88
	582		1315	8A	82	100					820 (J)
	583			1100	5103	TN					10,560 (J)
	585				20	27	27				134
	587	✓			133	TN					1330 (J)
	650				26	81					260
	651				38	73					317
	652				20	38					137
	653				66	TN					660
	654				168	TN					1680 (J)
	655				27	54					231
	656				52	116					520
	657				51	117					510
	658				8	10					51
	659				18	8					74
	660				91	TN					910
	661				14	36					144
	662				8	19					77
	663				2	9					31
	664				2	6					23
	665	✓	✓	✓	23	34					163

**Facility Controls**  
 Before Run: \_\_\_\_\_  
 Buffer Change: \_\_\_\_\_  
 After Run: \_\_\_\_\_

**Abbreviations**  
 + Total plate count > 200  
 Confl. Confluent growth  
 Spr. Spreader  
 TNC Too numerous to count  
 Many background organisms  
 EST Estimate - count based on non-ideal conditions

ANALYST \_\_\_\_\_ DATE \_\_\_\_\_  
 DATA VERIFIED BY \_\_\_\_\_ DATE \_\_\_\_\_

OVER FOR QUALITY CONTROL STEPS AND OBSERVATIONS



# Manchester Environmental Laboratory

## Report by Parameter for Project LAB-413G

<b>Project Code:</b>	LAB-413G	<b>Collected:</b>	12/16/02	<b>9:45:00</b>
<b>Project Name:</b>	ENVVEST	<b>Matrix:</b>	Liquid	
<b>Project Officer:</b>	BOB JOHNSTON	<b>Sample Number:</b>	02510582	
<b>Account Code:</b>	0304B10P20201B	<b>Type:</b>	Reg sample	
<b>Station Description:</b>	BI-FWSW			

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	<b>Result</b>	<b>Units</b>	<b>Qlfr</b>
<b>BIO</b>			
<b>Parameter</b> : Fecal Coliform (MF)			Container ID :
<b>Method</b> :			Analysis Date : 12/16/2002
<b>Prep Method</b> :			Prep Date :
<b>Analytes(s): *90099</b>	<b>Fecal Coliform (MF)</b>	<b>4224</b>	<b>per 100mL J</b>