

From: Gable.Jill@epamail.epa.gov
To: [Braley.Susan \(ECY\)](mailto:Braley.Susan@epamail.epa.gov)
Cc: [Croxtton.David@epamail.epa.gov](mailto:Croxton.David@epamail.epa.gov); [Archer.Jessica \(ECY\)](mailto:Archer.Jessica@epamail.epa.gov); [Gildersleeve.Melissa \(ECY\)](mailto:Gildersleeve.Melissa@epamail.epa.gov); [Herold.Mike \(ECY\)](mailto:Herold.Mike@epamail.epa.gov); Chellis.Tracy@epamail.epa.gov
Subject: Re: FW: Draft Revisions to Water Quality Policy 1-11 Now Available for Public Review
Date: Thursday, September 01, 2011 12:36:12 PM

Hi Susan,

Thanks for giving us the opportunity to comment on the draft revisions to the Water Quality Policy. We do have a couple comments/clarifying questions. Please let me know if you need any more information about any of them.

1. On page 5, the middle of the last paragraph, there is a typo. "... daily maximum temperature should be...."
2. On page 5-6, regarding EIM and usable data: EPA would like to see more discussion about how Ecology uses the data in EIM to influence decisions about further monitoring in a given waterbody.
3. On page 17, in the "Assessment of Waterbodies within a TMDL Area" section, the following statement is made: "Data generated during the development of a TMDL should be used for the Assessment. However, Assessment staff need to consult with TMDL staff regarding the adequacy of the dataset to make a category determination. If the dataset is determined to be inadequate, the data will not be used until the next assessment cycle."
Please clarify the criteria Ecology will use to determine that data are "inadequate" for assessment purposes.
4. On page 21, it states that listings will not be based on "advisories for marine biotoxins, nor on geoduck bed closures by the state Department of Natural Resources." Please clarify how these advisories differ from Department of Health shellfish advisories, where listing decisions are concerned.
5. On page 22, in the last paragraph, there is a typographical error. It says "the following two assessment methods," but three methods follow.
6. On page 23, EPA believes that if any one of the three assessment methods listed results in an exceedance, then a Category 5 listing is appropriate. Please explain why it indicates that exceedances of both the second AND third method are required, rather than exceedances of the first, second OR third method.
7. On page 42, EPA would like further explanation of the Natural Condition evaluation referenced in the arsenic assessment policy.
8. The assessment methodology does not specifically address harmful algal blooms, such as those that result in the presence of Microcystin toxins. Ecology's "toxic algae" database indicates that numerous toxic algal blooms occur throughout the state. How does Ecology go about determining whether or not such blooms represent a category 5 impairment? Does Ecology plan to use the Agency Advisory section of the assessment methodology; or the Toxic Substances portion of the assessment methodology?

Jill Gable, Watershed Unit
US EPA, Region 10
1200 Sixth Ave., Suite 900 (OWW-134)
Seattle, WA 98101-3140
(206) 553-2582, (206) 553-0165 (fax)
gable.jill@epa.gov