Maurano, Stephen

From: Jason D. Jones <Jones.Jason@azdeq.gov>
Sent: Thursday, August 25, 2016 3:36 PM
To: Maurano, Stephen
Cc: Krista L. Osterberg; Aiko Condon; Jason W. Sutter
Subject: Arizona's 2016 Integrated Report
Attachments: 2016 ADEQ Bear Canyon pH Natural Condition Report.docx

Hi Stephen – Thanks for taking the time to talk with me yesterday regarding the 2016 Assessment. I had a few follow up items from our call which I've detailed below. We are planning on submitting our response to comments to the Arizona Administrative Register after we get approval from our management. We are meeting with Trevor on 9/2/16 and will forward you a copy of the response to comments once approved.

1. The (1-2) and (9-10) and (1-11) below is the range of the number of samples.

Metal Samples	Nutrients & Related Samples	Other Sample
(1-2) Antimony, arsenic, beryllium, boron, cadmium, chromium, copper, lead, manganese, mercury, selenium, zinc	(9-10) Ammonia, nitrite/nitrate, nitrogen, phosphorus, total Kjeldahl nitrogen	(1-11) Dissolved oxygen, E SSC, total dissolved solids

2. The Acute Aquatic and Wildlife impairment criteria is "Two or more exceedances during the last 3 years of monitoring". The last 3 years refers to the last 3 years from the end of the assessment window. For the 2016 Integrated Report, this would be July 1, 2012 to June 30, 2015. This applies to all criteria that reference the 'last three years'. We have added language clarifying this to Chapter 2 of the 2016 Integrated Report.
3. Devils Chasm Creek (15060103-801B) had a note in the monitoring recommendations stating that "Collect more dissolved copper samples there was one A&W exceedance in 2010, but the data was determined to be noncredible." The split and regular sample on 9/21/10 from SRDEV000.38 for dissolved copper was outside of acceptable limits and listed as not credible. The acceptance criteria from our QAPP is "relative percent difference (RPD) is <20% for results greater than 2x the MRL." The RPD between the samples was 200%. This sample also had inconsistent results among the total and dissolved constituents.
4. You had asked why don't we have delist reports for all the waterbodies listed in Appendix E? We do delist reports for areas with ongoing projects.
5. The typo on page 2-1 that incorrectly had the page number as 3-1 has been fixed.
6. I've attached the finalized delist report for Bear Canyon Lake for low pH.
7. We took several reaches off the 303(d) impaired waters because of jurisdictional determinations that indicated that these reaches were not "Waters of the US".
    a. Queen Creek Tribs 15050100-991, 15050100-1843, 15050100-1000.
    b. Coors Lake 15030202-5000.
8. We added the Santa Cruz River Tubac Bridge – Sopori Wash 15050301-008B to the 303(d) impaired waters list for E. Coli.
9. You had asked for examples of assessment guidance that didn't make sense. Table 3-11 of the 2006 EPA assessment guidance does a good job outlining what is required and what is recommended. I don't think this matches up with reality though. I've read through several state's 305(b) integrated reports. I didn't see any that address required elements of the 2006 guidance like lake trends, cost benefit analysis and methods to mitigate high lake acidity. Arizona's assessment doesn't address these issues. In the larger picture, there are some assessment stats that just don't make sense to me. For example, Maryland, Michigan, New York, North Dakota, North Carolina, New Hampshire and Pennslyvania all have % assessed numbers in ATTAINS at or above 100%. Maryland has assessed 258.8% of their state (https://iaspub.epa.gov/waters10/attains_state.control?p_state=MD). That is impressive, but I'm not sure what that means. Ideally, I'd like to streamline the assessment as much as possible and still make it useful for both EPA and Arizona. The guidance that is out there is helpful but not complete and not always consistent. We have

an outside contractor that will be helping us improve many of our pro our assessment process and is tentatively scheduled help us through the assessment process at the end of December. We would love to have EPA involved since you are the main 'customer' of the assessment.

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