UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUN 1 2 2014

Jason Sutter
Water Quality Division
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, Arizona 85007

Dear Mr. Sutter:

Thank you for the opportunity to comment on the Arizona 2012-2014 303(d) List of Impaired Waters and supporting documentation pursuant to Clean Water Act (CWA) Section 303(d), dated May 2, 2014. EPA has reviewed the draft list of water quality segments requiring a TMDL identified in the 2012-2014 303(d) List, Category 5 Waters and is providing our comments at this time.

1) Data Assembly:
CWA Section 303(d) and 40 CFR 130.7 require that states "submit a description of the data and information used to identify waters, including a description of the existing and readily available data and information used" in 303(d) Reports[1]. Arizona Department of Environmental Quality (ADEQ) did not provide the date(s) for the public data solicitation or the list of data contributors in the 2012 - 2014 integrated report. EPA requests that a list of all stakeholders contributing data, and the dates for any public data solicitation be included in the 2012-2014 integrated report.

2) Priority Ranking:
CWA Section 303(d) and 40 CFR 130.7 also require that states include "… priority ranking for TMDL development (including waters targeted for TMDL development within the next two years)," [1] In reviewing Arizona's Impaired Waters Table referenced in Chapter IV, we did not see waters newly listed as impaired in 2012-2014 included in the table. It is also unclear which TMDLs are targeted for development within the next two years. Please add this information to the report to clarify priority ranking for TMDL development.

3) De-listing Impairments, Appendix E:
a) We have reviewed the State's proposed delisting of waterbodies in Appendix E, as well as the ADEQ report titled: *Organochlorine Pesticide Delist Report and Fish Consumption Advisory Withdrawal For the Middle Gila, Salt, and Hassayampa Rivers and Painted Rocks Reservoir and Borrow Pit Lake*, sent to EPA on May 21, 2004. The de-list report for the pesticide de-listings in the Middle Gila River, Salt River, Hassayampa River, and Painted Rock Reservoir should be included in the 2012-2014 integrated report.

b) Based on information in the May 21, 2004 report we also recommend that the Painted Rock Borrow Pit Lake (Reach 15070101-1010) remain on the State's 2012-2014 303(d) list of impaired waters.

[1] For more information see EPA's *Guidance for 2006 Assessment, Listing and Reporting Requirements Pursuant to Sections 303(d), 305(b) and 314 of the Clean Water Act*, which can be found on EPA's website at: http://www.epa.gov/owow/tmdl/2006IRG.

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Appendix B includes data collected by the US Fish and Wildlife Service in 2011, and shows four composite samples of fish tissue, (three crappie, and one largemouth bass), from Borrow Pit Lake that had Total DDTr levels above the State screening value of 0.117 mg/kg [based on the EPA screening levels for recreational fishers for total DDT (USEPA, 2000)]. The crappie fish tissue composites had Total DDTr concentrations of 0.12915, 0.16283 and 0.141 mg/kg, and the largemouth bass had a concentration of 0.37307 mg/kg. The report also suggests that sediments (from upstream locations such as Dysart Drain and St John's Canal) carrying DDT residue are flushed downstream during exceptional water years and are expected to settle in Borrow Pit Lake, as it is the "last hydrological sink before the Gila River becomes ephemeral in character northwest of Gila Bend," pp.13, and 18-19, ADEQ. Upstream of Borrow Pit Lake the data shows continual exceedances of the State screening standard. In Gila River Reach 15070101-008 there was one carp with a DDTr concentration of 0.3163 mg/kg. In Dysart Drain one fish composite of mixed species had a DDTr concentration of 4.1065 mg/kg. In St. Johns Canal there were two individual fish species, a small mouth bass and a carp, with Total DDTr concentrations of 0.586 and 1.808 mg/kg respectively.

c) For the Colorado River Selenium and East Verde River Boron delistings described in Appendix E, a separate de-list data summary should be added to the 2012-2014 integrated report. The data summaries should include: data and corresponding dates used to list the waterbody for the impairment, the comparative water quality standard(s), and new data and corresponding dates used to de-list the waterbody.

4) Upper Santa Cruz River *E.coli* impairments:

Tetra Tech, EPA's contractor, recently completed the *Upper Santa Cruz River Watershed – Data Summary and Analysis,* dated July 10, 2013, which included data from Friends of the Santa Cruz River (FOSCR), the International Boundary and Water Commission (IBWC) and ADEQ. After reviewing the Tetra Tech document, we think that *E.coli* water quality standard exceedances on two reaches of the Santa Cruz River meet ADEQ's requirements for listing. ADEQ should review the data related to the Tetra Tech report and consider appropriate listings for *E.coli* impairments in the Santa Cruz River on reach 15050301-009 and reach 15050301-008A. We provide a summary of the data showing *E.coli* exceedances in these two reaches in the following table, and have included the Tetra Tech report and data as enclosures to this letter.

Upper Santa Cruz River *E.coli* Data for Reach 15050301-009 and 15050301-008A

Reach	Waterbody ID	Site Name	Date	Result	Unit
Santa Cruz River, NIWTP to Josephine Canyon	15050301-009	RIO RICO	7/28/2009	1000	CFU/100 mL
Santa Cruz River, NIWTP to Josephine Canyon	15050301-009	RIO RICO	7/28/2010	31300	CFU/100 mL
Santa Cruz River, NIWTP to Josephine Canyon	15050301-009	RIO RICO	8/25/2010	2400	CFU/100 mL
Santa Cruz River, NIWTP to Josephine Canyon	15050301-009	Rio Rico Bridge	7/13/2011	1986.3	MPN/100 mL
Santa Cruz River, NIWTP to Josephine Canyon	15050301-009	RIO RICO	7/27/2011	860	CFU/100 mL

Santa Cruz River, Tubac Bridge to Sapori Wash	15050301-008A	NORTH OF CHAVES SIDING ROAD	7/28/2009	1100	CFU/100 mL
Santa Cruz River, Tubac Bridge to Sapori Wash	15050301-008A	NORTH OF CHAVES SIDING ROAD	7/28/2010	141300	CFU/100 mL
Santa Cruz River, Tubac Bridge to Sapori Wash	15050301-008A	NORTH OF CHAVES SIDING ROAD	8/25/2010	2400	CFU/100 mL
Santa Cruz River, Tubac Bridge to Sapori Wash	15050301-008A	NORTH OF CHAVES SIDING ROAD	9/8/2010	1046.2	CFU/100 mL
Santa Cruz River, Tubac Bridge to Sapori Wash	15050301-008A	NORTH OF CHAVES SIDING ROAD	7/27/2011	740	CFU/100 mL
Santa Cruz River, Tubac Bridge to Sapori Wash	15050301-008A	NORTH OF CHAVES SIDING ROAD	9/28/2011	2413	CFU/100 mL

We appreciate your consideration of our comments. If you have any questions or concerns, please contact me at (415) 972-3452.

Sincerely,

Janet Hashimoto

Janet Hashimoto
Manager, Standards & TMDL Office
Water Division

Enclosures

cc: Debra Daniel, Manager, Surface Water Section, ADEQ