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Susan Mosier, MD, Acting Secretary
Department of Health & Environment
Sam Brownback, Governor

January 29, 2016

EPA Water Docket No. EPA-HQ-OW-2015-0753
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20640

Email: ow-docket@epa.gov

Attention: Docket No. EPA-HQ-OW-2015-0753

The Kansas Department of Health and Environment (KDHE) appreciates the opportunity to provide the U.S. Environmental Protection Agency (EPA) with comments regarding EPA's Draft Recommended Aquatic Life Ambient Water Quality Criteria Cadmium- 2015.

The flexibility the draft guidance has allowed for States, who do not sample for dissolved metals, to utilize a conversion factor is appreciated. Kansas has utilized the total recoverable metals criteria and data since they are a more conservative approach, likely more protective of aquatic life, and ensure the highest potential level of toxic metals in the water column is accounted. Historically and in the foreseeable future, KDHE is not set up to sample for total dissolved metals, including cadmium. For this reason, we would apply a conversion factor to calculate the dissolved concentration for assessment with the new cadmium criteria. We recommend EPA retain this flexibility in its final criteria.

KDHE looks forward to working with EPA to properly assess impairments to aquatic life in Kansas streams caused by natural and anthropogenic-influenced cadmium.

If you have any questions regarding this letter, please contact me directly at (785) 296-5508 or e-mail me at jyoung@kdheks.gov.

Sincerely,

Julia L Young

Julia Young, Surface Water Quality Standards Coordinator
Kansas Department of Health and Environment
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cc Trevor Flynn, KDHE
Tom Stiles, KDHE