

Identify Priority Topics among Previously Proposed Changes to R317-2

(Brad) TDS

(Nathan)

1. Lack of numeric standards for chronic ammonia, total dissolved gases, and 7-day minimum dissolved oxygen as it applies to beneficial use class 3C
2. Request that the State, EPA, and the Service begin a dialogue to ensure proper implementation of the exemptions for mixing zones found in R317-2-5, particularly those for threatened and endangered species, and for bioaccumulative pollutants.

(Dave Moon)

1. The new CWA § 304(a) aquatic life criteria for diazinon and nonylphenol
2. The 1986 CWA § 304(a) criteria for E. coli, including the geometric mean and single sample recommendations
3. The federal UAA requirement and its applicability to the proposed change in aquatic life
4. Classification for the Escalante River (above Boulder Creek) and Saleratus Creek from Bear River to the Deseret Ranch High Ditch Diversion
5. Spatial/temporal variability of TDS levels in the segments where site-specific criteria were proposed, and the possible need to clarify how the single value criteria will be implemented (e.g., whether the intent is to maintain the current (variable) water quality levels in the segments, or portions of segments, where the protective statewide criterion is exceeded because of natural/irreversible conditions)
6. The issues raised in the public comments
7. EPA issues that were briefly outlined at the last meeting (e.g., whether chronic ammonia criteria are required to protect the Class 3C and Class 3D aquatic wildlife use designation)

DWQ Water Quality Standards Triennial Review – Areas of Focus

- Anti-degradation
 - Level I procedures allow “pollution creep” from permit renewal to renewal.
 - Confusion between a Level I and Level II review.
 - Excluding all but 3A and 3B waters is arbitrary and improper
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- TDS Criteria
 - Should the current two level TDS standard be maintained:
 - 1,200 mg/l for irrigated crops
 - 2,000 mg/l for stock-watering
 - Rule is confusing in that there are two standards for the same classification (Class 4 Agriculture)
 - Removing the 2,000 mg/l could affect de-icing our highways
 - The maximum not to exceed value should not be eliminated, but strengthened.
- Recreational Use Definition and Criteria
 - E. coli Criteria
 - Establish numeric criteria for viruses, antibiotics and other exotic pollutants
 - How do you determine the difference between Primary and Secondary Recreation [full-face immersion when water-skiing or rafting].
 - There should be better definition of “wildlife areas”
- Site Specific Criteria - Dissolved Oxygen
 - The site specific standard for the Jordan River and the Surplus Canal should be eliminated.
 - Standard should reflect diurnal variability.
- Mixing Zones
 - Prohibit mixing zones where there are endangered species
 - Mixing zone size is excessive
- Define Assessment Methodologies
- Define Use Attainability Analysis Process
- Wetlands Criteria
- Develop Nutrient Standards [phosphorus & nitrogen]
- Develop Biological Standard
- Tighten the narrative standard to be more specific
- Clean-up some classifications
- Better define temporary impacts
- Re-evaluate Standards for lakes & reservoirs
- Great Salt Lake Beneficial Use and Criteria