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## R8 comments on ADR guidance V2.0

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To: Nicholas von Stackelberg <nvonstackelberg@utah.gov>

Cc: "cbittner@utah.gov" <cbittner@utah.gov>, "Spence, Sandra" <Spence.Sandra@epa.gov>

Hi Nick

Nice job on the public comment version of the antidegradation guidance. I have a couple comments on the definitions for ambient condition and assimilative capacity.

First, UT may want to consider language that acknowledges the ambient condition could change, or at least is allowed to change if there is one or more point sources in the watershed that are not currently discharging at the permitted design flow, effluent limits or are not fully utilizing their waste load allocation.

Second, the proposed definition for assimilative capacity is qualitative and addresses considerations for narrative criteria. It would be strengthened if it also addressed what it means for parameters with numeric criteria (see definition in R317-001). I suggest that UT consider the following additions to the proposed definitions:

**ambient condition:** water quality of the receiving water immediately upstream of the point discharge. When there is one or more permitted point source in the receiving water, ambient condition will also account for the modeled water quality at the critical flow conditions if point sources are discharging at the permitted design flow and effluent limits.

**assimilative capacity:** the natural capacity of a water body to dilute and absorb pollutants and prevent harmful effects (e.g., damage to public health or physical, chemical, biological integrity of the water). When the pollutant has numeric water quality criteria, assimilative capacity is the difference between the numeric criteria and the ambient condition in the waterbody of interest where the concentration is less than the criterion.

Please let me know if you'd like to discuss these suggestions or have any questions.

Have a great weekend!

Lareina Guenzel

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