

These spreadsheets are intended to identify and track the Utah Division of Water Quality's (DWQ's) priorities for revisions to R317-2, Standards of Quality for Waters of the State. These spreadsheets are frequently updated the DWQ Standards Coordinator should be consulted for the most recent version. The identified issues may or may not result in any changes to the water quality standards. Only the Utah Water Quality Board has the authority to revise water quality standards after comments from the public and other interested parties are considered. After adoption by the Utah Water Quality Board, all standards changes must also be approved by U.S. Environmental Protection Agency.

There are 4 worksheets. Each worksheet is organized sequentially by subsection as they appear in UAC R317-2, e.g., R317-2-1, R317-2-2, R317-2-3, etc. A brief description and explanation of the revision are provided. The level of effort is a qualitative estimate of amount of DWQ resources necessary to evaluate the issue and develop appropriate rule language including both staff time and data needs. The projected dates for completion are based on DWQ's best estimate at the time based on current priorities. Past experience indicates that the completion dates may deviate from projected completion dates because of changing priorities.

The Current worksheet includes standards issues that are currently being evaluated and represent DWQ's current priorities.

The Future Evaluation worksheet includes standards issues that are either not scoped or an action is anticipated but the changes are dependent on specific data that are or will be collected and evaluated in the future.

The Hold worksheet is similar to the Future worksheet except that these standards issues have some evaluation but are currently on hold for an indeterminate time.

The Resolved worksheet includes standards issues that have been resolved.

**Utah Water Quality Standards Current Review Topics Workplan**

Rule R317-2	Standards Issues	DWQ LOE	Priority	Date Rqst	By	When	Notes
<b>1C Triennial Review</b>							
<b>2 Scope</b>							
<b>3 Antidegradation Policy</b>							
<b>4 Colorado River Salinity Standards</b>							
<b>5 Mixing Zones</b>							
<b>6 Use Designations</b>							
	Develop wetland uses	High	High	2011	EPA/DWQ		DWQ continues to work on developing wetland standards with EPA grant support. Development of use classes is anticipated to the first step followed by development of narrative or numeric criteria to protect those uses.
<b>7 Water Quality Standards</b>							
	Compliance Schedules	Low	Medium	2017	EPA/DWQ	2019	Federal regulations require an authorizing provision in water quality standards if UPDES permits will use compliance schedules to provide time to comply with water quality standards.
<b>8 Protection of Downstream Uses</b>							
<b>9 Intermittent Waters</b>							
<b>10 Laboratory and Field Analyses</b>							
<b>11 Public Participation</b>							
<b>12 Category 1 and Category 2 Waters</b>							
<b>13 Classification of Waters of the State</b>							
	Assign Beneficial Uses to Red Creek (Iron County), Cedar/Beaver WMU	Low	Low		Scott Daly, DWQ		Red Creek (Iron County) does not have specifically assigned uses and is therefore designated as Classes 2B, 3D (R317-2-13.13). An associated reservoir, Red Creek Reservoir (Iron County) has designated uses of Classes 2B, 3A, and 4. Red Creek upstream and downstream of the reservoir are recommended to include the same designated uses as the associated reservoir.
	Review beneficial uses for Willard Spur, Bear River Bay, Great Salt Lake	High	Medium	2011	Jeff Ostermiller, DWQ	2020	Need narrative standards for temperature, dissolved oxygen and ammonia or alternative methods to protect the use. Need Use Attainability Analysis to remove existing Class 3B numeric criteria for these parameters in the Bear River Migratory Bird Refuge.
<b>14 Numeric Criteria</b>							
	Jordan River site-specific temperature and TDS	High	High	2011	Hilary Arens DWQ	2019	post TMDL, 2016-2017 additional data are being collected.
	Review iron criteria for dissolved and total	Medium	Medium	2011 & 2014	EPA	2019	Iron criteria may have been erroneously changed to dissolved when other metals were changed to dissolved although absent a dissolved to total translator, 1 is assumed resulting in implementation as a totals criterion. However, the criterion could be modified site-specifically by measuring the dissolved fraction potentially resulting in an inappropriate modification to the criterion.

**Utah Water Quality Standards Current Review Topics Workplan**

Rule R317-2	Standards Issues	DWQ LOE	Priority	Date Rqst	By	When	Notes
	Update Se Aquatic Life Criteria to be consistent with USEPA 2016	High	Medium	2016	Chris Bittner, DWQ	2020	The 2016 USEPA selenium criteria are tissue-based and expected to be more stringent than the existing and lower than ambient for some Utah Locations. A limited number of fish samples were analyzed for selenium content. The fish were collected from waters where selenium concentrations are less than the current selenium criterion (4.6 ug/L) and the tissue concentrations were also below EPA USEPA recommendations. DWQ staff will develop an implementation plan for the adoption of the 2016 USEPA criteria.
	Adoption of the new ammonia criteria consistent with EPA 2013 and implementation methods	High	High	2014	EPA	2022	Historical surveys completed in 2017. Additional ammonia-specific eDNA field work postponed until 2020.

Utah Water Quality Standards Work Plan Topics On-Hold

Rule	Standards Issues	DWQ LOE	Priority	Date	By	When	Notes
<b>1C Triennial Review</b>							
<b>2 Scope</b>							
<b>3 Antidegradation Policy</b>							
<b>4 Colorado River Salinity Standards</b>							
<b>5 Mixing Zones</b>							
<b>6 Use Designations</b>							
	Develop tiered aquatic life beneficial uses	High	Low		Jeff Ostermiller, DWQ	2019	Initial efforts will focus on subclasses for implementation of the 2013 ammonia.
<b>7 Water Quality Standards</b>							
	Revise standards to indicate that the criterion is the greater of ambient or use-based criterion.	Low	High	2013	Chris Bittner, DWQ		Utah Standards already allow for setting site-specific standards. However, without the proposed change, Utah is obligated to list assessment units as impaired until a site-specific standard is promulgated even if the USEPA approved TMDL concludes that the source of the impairment is not anthropogenic. A rule change would allow the State to avoid listings these sites as impaired. From USEPA's 2014 Integrated Report memorandum: "States may have natural background provisions in EPA approved water quality standards that specify the applicable aquatic life water quality criterion will be equal to the natural background level of a pollutant if it is determined that the natural background level is less stringent than the otherwise applicable criteria. In the absence of a natural background provision in an EPA approved water quality standard or a site-specific criterion based on natural background, the otherwise applicable criterion is the basis for determining whether a waterbody is impaired." In 2016, this change was proposed and during the rule comment period, EPA indicated that it would not be approvable. In EPA's comments, they indicated that one key deficiency was the lack of a definition of "natural." Montana is currently working on definitions in response to State legislation. Utah will wait the outcome of Montana's rulemaking.
<b>8 Protection of Downstream Uses</b>							
<b>9 Intermittent Waters</b>							
<b>10 Laboratory and Field Analyses</b>							
<b>11</b>	Recategorize the following waters from Category 3 to Category 2: Provo from Jordanelle to Olmsted Diversion excluding Deer Creek Reservoir	Medium	Low	2011	Paul Dremman, TU		Trout Unlimited request: review existing 208 restrictions on discharges. Waiting for TU to compile supporting rationale and documentation 9/12/2011.
<b>12 Category 1 and Category 2 Waters</b>							
	Assign Beneficial Uses to Lee Creek	Medium	Low		Nicholas Von Stackelberg, DWQ		Lee Creek is currently assigned the default uses of Class 2B, and 3D. DWQ does not have data to suggest that the default uses are not protective.
<b>13 Classification of Waters of the State</b>							
	Translator for GSL selenium standard (egg to water translator)	High/Med	High	2011	Chris Bittner, DWQ		A translator is highly desirable for determining appropriate effluent limits for selenium. A translator is not feasible at existing Great Salt Lake selenium concentrations (<1 ug/l) as documented in the 2014 Jordan Valley Water Conservancy District UPDES permit FSSOB. Future data and/or research may support the determination of a translator in the future.
<b>14 Numeric Criteria</b>							
	Develop an action planning process when an MMI Analysis does not show a wetland meets an acceptable quality level as compared to the reference wetland. This would include the an analysis of beneficial use protection and would be in conformance with recommendations from the National Academy of Sciences TMDL Report (see page 49).	Medium	Low	2011	Leland Myers, CDSD		Pending validation and applicability of MMI or development of other wetland assessment methods
	Sediment quantity criteria for GSL	High	Low	2011			Technically challenging for arid systems with highly variable sediment loading
	Develop an action planning process when an MMI Analysis does not show a wetland meets an acceptable quality level as compared to the reference wetland. This would include the an analysis of beneficial use protection and would be in conformance with recommendations from the National Academy of Sciences TMDL Report (see page 49).	Medium	Low	2011	Leland Myers, CDSD		The multi-metric index approach did not appear to be discriminative and this approach was put on hold as work continues on developing wetland standards.
	Resolve the units for phenol in the aquatic life table.	Low	Low	2012	Chris Bittner, DWQ		EPA no longer has aquatic life criteria for phenol, so criteria could potentially be deleted

Utah Water Quality Standards Work Plan Future Topics

Rule	Standards Issues	DWQ LOE	Priority	Date	By	When	Notes
<b>1C Triennial Review</b>							
<b>2 Scope</b>							
<b>3 Antidegradation Policy</b>							
	Antidegradation Policy: Implementation Guidance: Complete Category Section Complete 401, 402, and General Permits Program	Low	Low	2011	DWQ		
<b>4 Colorado River Salinity Standards</b>							
<b>5 Mixing Zones</b>							
	Develop a mixing zone policy specifically for effluent dependent dry washes	High	High	2011	Nicholas Von Stackelberg, DWQ		Other States (e.g., WY, AZ) have use classes for effluent dependent waters but no specific waters have been classified as effluent-dependent. This suggests that these approaches may not be regulatorily viable.
	Evaluate applicability of current mixing policy for effluent dependent/dominated Great Salt Lake wetlands	High	High	2013	Leland Myers, CSDS		Current EPA Region 8 policy is no mixing zones for wetlands. Implementation of any numeric criteria for Great Salt Lake will require that implementation methods be developed. This topic will be considered at that time.
<b>6 Use Designations</b>							
	GSL wetlands - beneficial uses for different wetland types	High/Med	High	2011	Toby Hooker, DWQ		Wetlands work is ongoing. This task is archived until a potential change to standards is identified.
	Review Beneficial Use Class 3C	Medium	Low				Review the distinction between game and nongame fish
<b>7 Water Quality Standards</b>							
	Revise standards to indicate that the criterion is the greater of ambient or use-based criterion.	Low	High	2013	Chris Bittner, DWQ		Utah Standards already allow for setting site-specific standards. However, without the proposed change, Utah is obligated to list assessment units as impaired until a site-specific standard is promulgated even if the USEPA approved TMDL concludes that the source of the impairment is not anthropogenic. A rule change may allow the State to avoid listings these sites as impaired. From USEPA's 2014 Integrated Report memorandum: "States may have natural background provisions in EPA approved water quality standards that specify the applicable aquatic life water quality criterion will be equal to the natural background level of a pollutant if it is determined that the natural background level is less stringent than the otherwise applicable criteria. In the absence of a natural background provision in an EPA approved water quality standard or a site-specific criterion based on natural background, the otherwise applicable criterion is the basis for determining whether a waterbody is impaired." In 2016, this change was proposed and during the rule comment period, EPA indicated that it would not be approvable. In EPA's comments, they indicated that one key deficiency was the lack of a definition of "natural." Montana is currently working on definitions in response to State legislation. Utah will wait the outcome of Montana's rulemaking.
<b>8 Protection of Downstream Uses</b>							
<b>9 Intermittent Waters</b>							
<b>10 Laboratory and Field Analyses</b>							
<b>11 Public Participation</b>							
<b>12 Category 1 and Category 2 Waters</b>							
<b>13 Classification of Waters of the State</b>							
	Reclassify Pineview Reservoir, Weber River WMU, from 3A to 3B	Low	Medium	2002	Kari Lundeen DWQ		Recommendation of the 2002 TMDL
	Change beneficial uses of Salteratus Creek, Bear River WMU, from 3A to 3D	Low	Low	2013	Mike Allred, DWQ		DWQ no longer assesses Salteratus Creek, TMDL has most of work done.
	Change beneficial use of Recapture Reservoir, Colorado River Southeast, from 3A to 3B	Low	Medium	2013	Mike Allred, DWQ		Recommendation of TMDL
<b>14 Numeric Criteria</b>							
	Site-specific TDS Standard Antelope Creek, Uinta WMU	High	High	2013	Sandy Wingert, DWQ		Data require analyses. This TDS impairment is a lower priority.
	Delete pH and DO standards for all wetlands. Replace with a multi-metric index or narrative approach.	Med/High	Low	2011	Jeff Ostermiller, DWQ		Narrative will first be developed for Willard Spur.
	Develop numeric criteria for Gilbert Bay, Great Salt Lake	High	High	2012	Chris Bittner, DWQ		Bioassays ongoing

Utah Water Quality Standards Work Plan Future Topics

Rule R317- 2-	Standards Issues	DWQ LOE	Priority	Date	By	When	Notes
	Develop numeric criteria for Farmington Bay, Great Salt Lake	High	High	2012	Chris Bittner, DWQ		Develop resident species lists. Aquatic Life Use workshop held in 2015 and report issued that identifies key data gaps. Benthic macroinvertebrate and fish surveys ongoing 2019.
	Develop numeric criteria for Bear River Bay, Great Salt Lake	High	Medium	2012	Chris Bittner, DWQ		Develop resident species lists and determine if USEPA species deletion procedure can be applied. Aquatic Life Use workshop held in 2015 and report issued that identifies key data gaps.
	Revised temperature criteria with consideration of assessment methods	High	Medium	2011	Chris Bittner, DWQ		New temperature listings could have a low priority (unless waterbody is receiving a thermal discharge), and potentially be delisted once standards are revised. Court disapproved Oregon's natural conditions temperature criteria. Review revised Oregon approach when completed. Should include an allowance for excursions due to unusual weather. Can work with TMDL group to develop rationale for site-specific standards proposals until a state-wide approach can be developed
	TDS - explore dividing the agricultural use into livestock and irrigation and the necessary criteria to adopt those uses (e.g. adoption of EC/SAR criteria for irrigation, criteria for livestock)	High	Medium	2011	Chris Bittner, DWQ		Can work with TMDL group to develop rationale for site-specific standards proposals until a state-wide approach can be developed; Montana rules being challenged in court 2010.
	Adopt updated aquatic life water quality criteria for chloride	Low	Medium	2011	EPA		USEPA updated AWQC. Adoption was delayed in 2011 until DWQ can evaluate the applicability to Utah of the USEPA default chloride standard. Aquatic life criteria for ions (e.g., TDS) in needed.
	Averaging periods that consider assessment methods for high frequency temperature measurements	Medium	Low				Assessment methods proposed in 2016 Integrated Report
	Evaluate existing DO standards and assessment methods for lakes and reservoirs	Medium	Medium	2012	Lareina Guenzel, EPA8	2018	Ensure that assessment methodology is consistent with dissolved oxygen standard for issues such as TMDL targets of 50% of the water column having sufficient DO or limiting the application of the standard to the epilimnion of stratified lakes.

**Utah Water Quality Standards Work Plan Resolved Topics**

Rule R317-2	Standards Issues	DWQ LOE	Priority	Date Rqst	By	When	Notes
<b>1C Triennial Review</b>							
<b>2 Scope</b>							
<b>3 Antidegradation Policy</b>							
	Revise requirement to do a level II ADR for Class 1C waters	Low	High	2014	Reed Obendorfer, CUP	2018	This requirement was added when Utah had several off ramps and Level II ADRs were not required. Under Utah's current approach, level II ADRs are required for all new or expanding discharges which meets the intent of the Class 1C requirement to do a level II ADR.
	Antidegradation Policy: Implementation Guidance: Complete Category Section Complete 401, 402, and General Permits Program	Medium	Medium	2011	Nicholas Von Stackelberg, DWQ	2013	The implementation guidance was originally part of the rule revision package. Changes to the guidance is not a standards change. DWQ's intent is to continue to use the WQS workgroup to review changes to implementation guidance.
	Update application form and guidance if necessary to eliminate the Class 1C requirement per 2018 revisions	low	high	2018	Chris Bittner, DWQ	completed 2019	Also see EPA antidegradation comments for 2017 Triennial Review.
	Change Categories 1, 2, and 3 to Tier 1, 2, and 3 to be consistent with Federal program and other States	Low	Low	2011	Chris Bittner, DWQ	2014	Eliminate confusion regarding the nexus of Federal and State Rules. Utah's Categories don't match up with USEPA Tiers and DWQ decided not to pursue this change because the terminology between State and USEPA could not be reconciled without revising the intent of the rule.
<b>4 Colorado River Salinity Standards</b>							
<b>5 Mixing Zones</b>							
<b>6 Use Designations</b>							
	Implement identification numbers to provide consistency between standards, assessment, and TMDLs (e.g., NHD)	Medium	Low	2011	Chris Bittner, DWQ	2018	Spatial descriptions of assessment units and water quality standards segments have been harmonized and specific revisions to standards identified.
<b>7 Water Quality Standards</b>							
	Modify standards to allow the use of the biotic-ligand model or water effects ratio for site-specific standards	Low	Low			Completed 2012	R317-2-7 was concluded to already allow for site-specific standards for a several reasons including the biotic-ligand model or water effects ratio.
	Revise "a less stringent criterion is appropriate because of natural or un-alterable conditions" to apply to any parameter, not just TDS and temperature	Low	Medium			Completed 2012	R317-2-7 was revised to allow for site-specific standards for a general reasons that would include the biotic-ligand model or water effects ratio.
	Assess Biotic ligand model for inclusion into zinc aquatic life standards	Medium	Low			Completed 2012	R317-2-7 allows for site-specific standards for a several reasons including the biotic-ligand model or water effects ratio. Currently, USEPA has not accepted a biotic-ligand model for pollutants other than copper.
	Revisions to narrative standard - expand to address biological condition	Med/Low	High			Completed 2013	Revisions will better align standards with assessments based on biology
<b>8 Protection of Downstream Uses</b>							

**Utah Water Quality Standards Work Plan Resolved Topics**

Rule R317-2	Standards Issues	DWQ LOE	Priority	Date Rqst	By	When	Notes
	EPA has requested that DWQ review the rule for consistency with federal requirements. The review will be done as part of the nutrient criteria efforts.	Low	Low	2012	Chris Bittner, DWQ	Completed 2019	For the 2017 Triennial Review, EPA commented that a downstream protection provision should be added to the standards. R317-2-8 already includes a requirement to protect downstream uses. The adequacy of this requirement will be reviewed as part of the efforts to develop numeric criteria for the Utah's headwaters.
<b>10 Laboratory and Field Analyses</b>							
<b>11 Public Participation</b>							
		Low	Medium	2017	EPA	2018	Ensure that the public participation requirements are consistent with 40 CFR 131.20. Standards were revised.
<b>12 Category 1 and Category 2 Waters</b>							
	Revise Category 1 descriptions for Oakley and Coalville WWTPs	Low	Medium			Completed 2012	Category 1 boundary is defined as US 189 which subsequently was moved with road construction. US189 is no longer a valid geographical residence. Reestablish Category 1 boundary in the same location with a new reference.
	In R317-2-12.2 Revise Category 2 Fountain Green To Uintah, should be Category 3	Low	Medium			Completed 2012	This exception was inadvertently moved from R317-2-12.1 during the last rulemaking resulting in this reach being changed to Category 2 as opposed to being excluded from Category 1 (and by default, Category 3)
<b>13 Classification of Waters of the State</b>							
	Blue Creek Site-specific TDS Standard	Medium	High	2008	ATK	2014	Site-specific TDS standard adopted 2014
	Revise upstream boundary for Spring Creek (Bear River WMU) site-specific TDS standard	High	Low	2011	Chris Bittner, DWQ		Existing boundary is US 89 which is downstream of the facility that instigated the investigation for a site-specific standard. 05/10/2011, no change necessary, boundary is the beginning of Spring Creek.
	Assign beneficial uses	Low	High			Completed 2012	Sand Hollow Reservoir; Big East Reservoir; Emigration Creek Red Butte Creek
	Change Recreation Beneficial Use	Low	Medium			Completed 2012	Restored Ogden River from 2B to 2A; Fremont River Capitol Reef from 2B to 2A; Hyrum Reservoir from 2B to 2A (already 2A, 05102011) Delete 2B wherever more stringent 2A assigned
	Remove or define astericks in lake beneficial uses	Low	Low			Completed 2012	
	Change Burriston creek to Currant Cree	Low	Low			Completed 2013	The WQ standards list the inlet stream for Mona Reservoir as Burriston Creek (see R317-2-13.5-c) However, the USGS maps and DWQ publications like "Utah's Priority Lakes and Reservoirs" describe the inlet and outlet stream as Currant Creek. There is a small group of ponds called "Burriston Ponds" located about 1.5 miles upstream from the inlet of Mona Reservoir near Currant Creek. I assume the use of Burriston Creek may be a local name, but I think Currant Creek is more official. In addition, the outlet stream of Mona Reservoir is known in the WQ standards as Currant Creek. In the beneficial use designation section (R317-2-13.5-c):Burriston Creek from Mona Reservoir to headwaters....2B 3A, 4 should read:Currant Creek from Mona Reservoir to headwaters....2B 3A, 4

**Utah Water Quality Standards Work Plan Resolved Topics**

<b>Rule R317-2</b>	<b>Standards Issues</b>	<b>DWQ LOE</b>	<b>Priority</b>	<b>Date Rqst</b>	<b>By</b>	<b>When</b>	<b>Notes</b>
	Add the Class 1C use to Weber River-3	Low	Low	2014	Erica Gaddis, DWQ	2016	Weber River-3 has drinking water intake for WCD Central. Weber Basin Water Conservancy District was consulted and reported that they do not have drinking water intakes in this reach. No change is necessary.
	Add the Class 1C use to Scout Lake	Low	Low	2014	Erica Gaddis, DWQ	2016	Scout Lake was supported to be a public drinking water source (Camp Steiner) but after further investigation with the Division of Drinking Water, the water source is a spring. No change is necessary.
	Add Class 1C to Battle and Grove Creeks, Utah County	Low	Low	2016	American Fork City Erica Gaddis, DWQ	2018	Battle and Grove Creeks are currently classified as Classes 2B and 3D and are Category 1 waters. The aquatic life use will be updated in addition to adding the drinking water use. DWQ contacted the Utah Division of Wildlife Resources who identified these streams as supporting cold water aquatic life. DWQ will conduct a site reconnaissance in the summer 2017 to verify that the temperature requirements for Class 3A. The standards revision will be proposed after these data are available.
	Reclassify Utah Lake from Class 2B to 2A	Low	Medium	2015	Erica Gaddis, DWQ Arne Hulquist, Watershed Coordinator	2017	Utah Lake supports extensive frequent primary contact via water skiing and wake boarding. As of 5/17, awaiting formal rulemaking
	Reclassify Mill Creek (Moab) from Class 2B to 2A	Low		2015		2018	Change is supported by photographs, internet entries, a letter from the BLM, and the local watershed chapter. As of 5/17, awaiting formal rulemaking
	Correct names of various waters	Low	High	2018	Chris Bittner, DWQ	2018	DWQ is spatially integrating the standards and water quality assessments for Integrated Report. Several discrepancies in naming conventions were identified. USGS maps were researched and corrections were identified. These will continue to be corrected as they are detected.

**14 Numeric Criteria**

	Add footnotes when a site-specific criterion applies with different footnotes for site-specific criteria based on recalculation and site-specific criteria based on a use attainability analysis.	Low	Low	2016	Chris Bittner, DWQ	2018	This will help to ensure that appropriate criteria are applied
	Delete temperature from fluoride criteria	Low	High	2015	Chris Bittner, DWQ	2016	Temperature correction was based on a presumed increased water ingestion rate at higher temperatures that is no longer supported by EPA.
	Delete acute criteria for mercury	Low	Medium			Completed 2012	Acute standard no longer supported by USEPA because standard not protective of bioaccumulation
	Adopt updated human health water quality criteria for phenol, acrolein, and tributyl tin	Low	Medium			Completed 2012	USEPA updated AWQC
	Adopt updated aquatic life water quality criteria for acrolein, chlorpyrifos, and tributyl tin	Low	Medium			Completed 2012	USEPA updated AWQC

Utah Water Quality Standards Work Plan Resolved Topics

Rule R317-2	Standards Issues	DWQ LOE	Priority	Date Rqst	By	When	Notes
	Site-specific TDS Standards	Medium	High			Completed 2012	Price River between Soldier and Coal Creeks;
	Fix formula for calculating H2S	Low	Medium	2012		2015	Formula deleted. Standard methods provide appropriate formulas
	Housekeeping: Fix footnote reference for pollution indicators in Aquatic Life table		Low	2014	Chris Bittner, DWQ	2015	Pollution indicator should be footnote 10 instead of 11.
	Hardness Correction formulas for Ni, Ag, and Zn missing parantheses	Low	Low	2013	Leland Myers, CDSD	2015	Corrected
	Investigate if Gross Alpha should be indicator	Medium	Medium	2015	Chris Bittner, DWQ	2015	EPA does not have criteria for gross alpha, like gross beta, which is an indicator, gross alpha is a non-specific measurement
	Identify Table 13.2 in the standards	Low	Low	2011	Chris Bittner, DWQ		No reference in standards for table. 05/10/2011, No change necessary because none of the tables in R317-2 have references.