

**Responsiveness Summary by Utah Division of Water Quality (DWQ)
2014 Triennial Review of Water Quality Standards
Comments received by March 18, 2014**

1. Carbaryl Aquatic Life Criteria

DWQ has scheduled a review of the 2012 United States Environmental Protection Agency (USEPA) carbaryl aquatic life criteria for 2014 with the Utah Water Quality Standards Workgroup. DWQ anticipates that this work can be completed in 2015 culminating with the proposed adoption of carbaryl criteria.

2. Ammonia Aquatic Life Criteria

DWQ has initiated discussions with the Utah Water Quality Standards Workgroup regarding the applicability and implementation of the 2013 USEPA ammonia aquatic life criteria for Utah waters. In accordance with USEPA recommendations for implementing these criteria, DWQ has compiled the readily available data regarding the presence of unionid mussels and non-pulmonate snails. To meet State regulations, a preliminary evaluation of the impacts of the 2013 ammonia criteria on Utah's publicly owned treatment works was conducted. DWQ will evaluate Utah waters for the presence, or potential presence, of organisms sensitive to ammonia toxicity to promulgate appropriate ammonia standards for Utah's waters. These evaluations are anticipated to take one to two years and new ammonia criteria proposed for adoption in 2017.

3. Existing Iron Aquatic Life Criteria

DWQ will initiate evaluation of Utah's existing conversion factor (dissolved to total recoverable) for iron aquatic life criteria in 2014. The State of Colorado recently evaluated conversion factors and DWQ will review these evaluations with the Utah Water Quality Standards Workgroup. DWQ notes that currently there is no indication that Utah's existing iron criteria has been less than fully protective of the aquatic life uses. In the absence of a published conversion factor from dissolved to total recoverable iron, a default of 100 percent, which is a protective assumption, is assumed unless a site-specific conversion factors is established. Utah doesn't currently have any site-specific conversion factors for dissolved to total recoverable iron.

4. Review of the Gilbert Bay Selenium Criterion.

DWQ is considering several approaches to addressing the protectiveness of the Gilbert Bay selenium criterion. Potential approaches under consideration are either a change to the Standards or assessment methods. DWQ will also review the two USEPA tissue-based criteria (methylmercury criterion and proposed selenium criteria) for potential methods. Currently, an adequate margin of safety exists between the Gilbert Bay criterion (12.5 mg/kg) and the concentrations of selenium (< 6 mg/kg)

measured in bird eggs. DWQ ranks this as a lower priority and anticipates resolving the issue by the 2017 Triennial Review.

5. Human Health Criteria

DWQ will review 2001 USEPA methylmercury criterion with the Utah Water Quality Standards Workgroup beginning in 2014 and anticipates making recommendations for any revisions to the criteria in 2015.

Adoption of the 2001 USEPA methylmercury criterion has previously been a lower priority because current approaches to controlling mercury releases to water are effective. Utah's mercury water quality criterion has already been adjusted lower to 0.012 µg/l to protect human health from potential mercury exposures from fish consumption. With USEPA laboratory support, DWQ and the Utah Departments of Health and Natural Resources annually evaluate mercury results for fish collected from Utah waters. Fish consumption advisories to protect human health are issued when concentrations exceed the 2001 methylmercury criterion. Currently, only one Utah water with a fish consumption advisory has permitted discharges.

6. Nutrient Criteria

As noted in the comment, Utah has made marked progress in managing nutrient pollution. DWQ remains committed to ensuring the Utah's waters are protected from the potential impacts on excess nutrients. While additional unforeseen complexities may cause delays, DWQ anticipates proposing use-based nutrient criteria for Utah antidegradation Category 1 waters in 2014.

7. Use Designations

DWQ initiated discussions in 2014 with the Utah Water Quality Standards Workgroup regarding appropriate standards for Willard Bay. The initial conclusions of the Willard Spur studies are that the existing uses are currently being protected. DWQ anticipates making recommendations to ensure long term protection of Willard Spur's water quality in 2014.

DWQ continues to revise designated uses when data are available to support those changes as evidenced by the standards revisions for Class 2B waters to Class 2A for the 2011 Triennial Review. No data or requests were submitted for the 2014 Triennial Review and DWQ does not currently anticipate any additional changes to use designations. The establishment of tiered aquatic life uses remains a long term goal for Utah's standards.

8. Make Supporting Information Available to the Public

DWQ devotes considerable resources to ensuring that the explanatory rationale for standards changes is available to all of our stakeholders in accordance with both USEPA and State rules. All standards changes are vetted with the Utah Water Quality Standards Workgroup prior to initiating rulemaking with the Utah Water Quality Board. Utah's Administrative Code includes specific public participation

requirements which meet the minimum federal requirements. DWQ looks forward to working with USEPA to improve our public participation processes and encourage stakeholder participation in protecting Utah's water quality.