



2018 303(d) List & 2020 303(d) Listing Methodology Document
Public Availability Meeting #2
Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO
September 19, 2017

Meeting Purpose:

An open forum for comments, questions and discussion on proposed 2018 303(d) impaired waters listings and the data used for assessments. The meeting was also an open forum for comments, questions, and discussion on the proposed 2020 303(d) Listing Methodology Document.

Summary of the Topics Discussed:

General Discussion:

1. General discussion on future pollutant trends and challenges related to drinking water, permits, etc.
2. Timeline for listing impaired waters, Clean Water Commission hearing, and submitting the list to EPA was discussed.
3. Timeline and schedule for writing TMDLs was discussed.

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4. The question was asked if there was still time to submit data that could potentially change the listing of a stream. The department's response was that data will be taken until the end of the public comment period (Oct. 13, 2017).
5. Discussion regarding data age, number of samples taken, and new listings; stakeholders are concerned that the age of some data does not represent the current state of waters and that they would like to see more recent data specifically regarding Brushy Creek. Staff discussed that new data will only be collected if there is reason to believe there has been a significant change in the watershed.
 - a. MoDNR after meeting follow-up: There was a TMDL written for Brushy Creek in 2002. Facility upgrades were completed shortly thereafter. Only 2003 and newer data should be considered for assessment. MoDNR re-assessment after the meeting shows that the water is meeting standards. Thus MoDNR will be removing Brushy Creek from the Proposed 2018 303(d) List.

6. There was discussion regarding why the entire segment of Muddy Creek was listed as impaired when data exists for only 2 locations. Staff explained that the two sampling locations were representative for the entire segment. Staff also discussed the possibility of specific areas of a stream being listed in the future instead of entire lengths.
7. Petite Saline Creek was discussed regarding data age and number of exceedances.
8. River Des Peres tributary data and sampling locations were discussed.
9. Martigney Creek data was discussed.

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10. Discussion of the use of duplicate samples in assessments. It was also brought to the department's attention that duplicate samples might be used as a quality control measure for analytical testing only.
 - a. Concern over two duplicate samples taken by the department that are not within the relative percent difference thresholds. It was suggested that these samples be removed if they were not in conformance with protocol.
11. The department's methodology was discussed on the use of a sample that has high bacterial levels due to a precipitation event with higher runoff influencing the results.
 - a. The department responded that single samples should not skew the data when using geometric means, but there are occasions that extremely high results can potentially impact the listing of a stream, if only one sample is driving the listing, then more data should be collected. Care should be taken to make sure all samples are not taken during high-flow events, thus biasing the dataset.
 - b. A request was made to add more clarity in the Listing Methodology Document on how the department handles high-flow bacterial samples when determining impairments, as well as how the department handles qualifiers such as >, <, and E.
12. Discussion of the use of USGS hydrography data being used in relation to flow conditions and data collection.
13. Suggestions were made pertaining to bacterial data reporting and clarifying how final results are calculated.
14. Sample sizes used to list impaired waters were discussed. Concern was expressed over low sampling sizes and sampling time period, specifically pertaining to Gailey Branch.
15. Statistical methods were discussed with explanations on how sample sizes and amounts of data are used to determine impaired status.