



Meeting Summary for TMDL Prioritization and
2020 Listing Methodology Public Meeting
February 5, 2018
Lewis and Clark State Office Building
Jefferson City, Missouri

TMDL Prioritization:

- An update was given on the current status of the Total Maximum Daily Load (TMDL) Prioritization, which is on public notice until February 26, 2018. This document can be found on the Department's TMDL webpage. One written comment had been received to date requesting TMDL prioritization to consider rewriting some past approved TMDLs. In addition to this comment, the Department noted that based on statements made during the January 18th meeting regarding Dry Hollow, Water Body ID (WBID) 3163, and Bee Fork WBID 2760, the Department is considering reprioritizing those waters to a lower priority for TMDL development. One stakeholder suggested that Big River, WBID 2080, as well as Flat River Creek, WBID 2168, also be reprioritized to a lower priority due to planned remediation projects in that area. A question was raised to Department staff if a new TMDL would be written in addition to the existing TMDL on the Big River or if the existing TMDL would be revised. Staff responded that both options would be considered. The Department is also receiving comments on the Category 5-Alternative Documentation Checklist, which is located on the Department's TMDL webpage.
- A question was asked about how older bacteria TMDLs had been implemented. Department staff responded that implementation primarily occurred through permit limits, disinfection technology, and through Section 319 funded best management practices or plans, as well as Soil and Water Conservation Program cost-share practices. TMDL implementation in urban areas in St. Louis County are occurring through the removal of constructed sanitary sewer overflows, combined sanitary sewer overflow control plans, municipal separate storm sewer system permits, and through actions implemented as part of the consent decree between the Environmental Protection Agency (EPA) and the Metropolitan St. Louis Sewer District. Approximately 1.8 million dollars for various Soil and Water Conservation practices has been spent in four of the watersheds having approved bacteria TMDLs.

2020 LMD Data Quality Codes:

- It was discussed that draft text would be added to the 2020 Listing Methodology Document (LMD) to further describe the purpose of data quality codes and their significance. It was also advised that the Department further define in the 2020 LMD what is considered acceptable data, what kind of Standard Operating Procedures (SOPs) and Quality Assurance Project Plans (QAPPs) are to be used, as well as trained data submitter credentials and the sampling method used—all of which must be EPA approved. Department staff explained that if an entity submits data that does not necessarily meet data quality protocol, the Department will not use this data for an impairment decision, but rather this data will be used as further evidence potentially indicating an impairment. It was decided that draft language that will be used in the 2020 LMD will be posted on the Department's 303(d) webpage.

Data Age:

- There was concern over the consistency between statements made in the 2020 LMD regarding age of data used for assessments. Two statements were prepared and presented to stakeholders to determine which version of LMD language pertaining to data age was preferred. Stakeholders could not decide at the meeting which statement would be best but the Department indicated it is more comfortable with the first option:
 - “If a water body that has not previously been listed and has data all of which is older than 7 years, then the Department will add the water to either Category 2B or 3B and prioritize it for future sampling.”
 - “If a water body has not been listed previously and all data indicating an impairment is older than 7 years, then the water shall be placed into Category 2B or 3B and prioritized for future sampling.”
- If older data was collected under current protocol and methods, then it can be considered as relevant as newer data if there is no other data available for the water body in question. Stakeholders wanted to ensure that newer data is held in higher regard and an explanation of prioritization of data collection was requested. The Department noted that data collection occurs as time and funding allows while taking into consideration changes in watershed activities, data age, and TMDL prioritization changes.
- The responsibility of data collection can fall upon various groups or individuals depending on circumstances and seasonal limits. The Department will work with interested entities who wish to collect data for water quality purposes. If wastewater

treatment plants are upgraded and entities want the Department to perform additional monitoring, then staff can schedule these submissions within the QAPP as budget and time allows.

- To address various data related concerns brought up in the January 18, 2018 meeting, the Department prepared the following basic statistics:
 - 47 of 470 303(d) listings, or ten percent, contain data older than seven years.
 - 353 of 470 303(d) listings, or 75 percent contain data collected in the last five to six years.
 - One new 303(d) listing contains data older than seven years.
 - The remaining difference is a combination of older and newer data used for impairment listing decisions.
- One concern was brought forth by stakeholders in regard to whether or not the Department contacts potential point sources of pollution that have been suspected of causing an impairment prior to a 303(d) listing decision. The Department stated that in the future we will try to make contact with responsible parties to determine if any changes have occurred in the watershed that they should know about. Also, there will be more emphasis on contacting entities who might be involved with a potential 303(d) listing and working cooperatively in order to derive a sensible solution to the potential problem causing the water quality impairment.

Total Organic Carbon (TOC) Normalization:

- Concerned stakeholders requested to talk with the Department at a later date to discuss TOC pertaining to specific water bodies.

Chronic Criteria:

- The Department stated that the “one-in-three year” method of assessing chronic criteria during stable flows is the preferred method of assessment and would like to continue using this assessment method. Stakeholders had no additional comments at this time and the Department is open to further discussion on this topic.

Lake Numeric Nutrient Criteria (NNC):

- Stakeholders discussed their hope that EPA approves the Missouri criteria proposal. The Department briefly discussed some of the drawbacks of the EPA criteria proposal in its current form including uncertainty of mathematical calculations that the Department was unable to replicate due to the calculation methods being unknown at this time. The Department explained that because of this, in the event that the EPA criteria is imposed, at this time Listing Methodology Document language can be drafted based only on the Department's best current understanding. Stakeholders agreed that it would be best to continue the NNC discussion when there is more certainty as to which version, Missouri's or EPA's, will be used. At this time stakeholders agreed to leave the Listing Methodology Document as it is for now and to address Missouri-specific NNC and expanding it as needed in the future.
- The Department will not be making any assessments against the Missouri criteria until EPA has approved it.

Assessing Small Streams:

- The Department requested to wait for discussion on this topic until the March meeting due to internal discussions still needing to take place.

Stream Segments and Impairments:

- The Department has agreed to include an additional column on the 303(d) List to note if an entire WBID is impaired or not. This information will be added to the approved 2018 303(d) List. Specific information pertaining to the location of impairments is available on listing worksheets using site codes, using the map viewer link in the county column of the 2018 303(d) List, or by contacting the Department.
- Currently the Department does not have the technical ability to track and to divide up WBIDs into smaller assessment units. The Department needs to modify its databases in order to do this. The department is OA-ITSD consolidated, therefore IT projects are prioritized amongst multiple programs as well as multiple agencies. The Department has asked for the project to be prioritized.