

ADEQ Input on Assessment Methodology

3.2 Data Quality Considerations

Understanding and clarity of the bulleted list of data quality considerations could be increased by separating the list into two lists, one for “Individual data sets” and another for “aggregate data sets”. A flowchart of these lists may also increase understandability.

3.2.1 Tiered Approach to Qualifying Data

Table I will be revised for clarity.

3.2.2 Biological Integrity Data

Tables II, III, IV, and V will be revised for clarity.

3.3 Data Representativeness Considerations

Understanding and clarity of Section 3.3 can be increased by rearranging the text and putting it before Section 3.2.1.

Understanding and clarity of Spatial and Temporal distributions for both individual and aggregate data sets may need clarification.

3.4 Instrument Error

ADEQ will evaluate the considerations needed regarding instrument error and may propose revisions to this section.

3.5 Aggregation of Samples within a Monitoring Segment

Understanding and clarity of Section 3.5 can be increased by rearranging the text and putting it before Section 3.2.1.

3.6 Data Quantity Considerations

Understanding and clarity of Section 3.6 may be increased by more clearly stating what the data quantity considerations are for data used for assessment purposes.

3.7 Adequate Data Sets for Attainment Determinations

Understanding and clarity of Section 3.7 may be increased by better explanation and description of aggregate data sets and their requirements.

Monitoring activities will be updated to more accurately describe ADEQ’s current monitoring strategies.

3.10 WQAR

Revisions the WQAR section may necessary to reflect any modifications or updates to the WQAR program since the 2016 cycle.

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6.0 SPECIFIC STANDARDS

ADEQ will evaluate the use of the rounding method and strive to provide scientific justification of the use of this method in assessments.

Revisions are needed to Sections 6.1 through 6.12 regarding the sample depth language for lakes to more accurately reflect the sampling methods used by ADEQ and other sources of data and to be consistent with the most recent EPA approved Reg. 2.

6.2 Turbidity

Revisions are needed to conform with the recently EPA approved Regulation No. 2. The term “all flow(s)” needs to be replaced with “storm flow(s).” This will keep the Assessment Methodology consistent with the most current CWA approved version of Reg. 2.

6.9 Nutrients

Revisions may be needed to clarify the implementation of site specific Beaver Lake nutrient criteria assessments.

6.10 Mineral Quality

Revisions are needed regarding the assessment of site specific minerals criteria. The “1 in 10” language was stricken in 2007 paving the way for the 25 percent exceedance; however this removal was disapproved by EPA in 2008. As a result, the stricken language that specifies minerals are not to exceed in more than “1 in 10 samples collected over a period of not less than 30 days or more than 360 days” is in place for CWA purposes and must be added back to the Reg. 2.511(a) language. Site specific minerals criteria must be assessed according to the EPA approved language.