

Topic	Comment	Response
<p>General Discussion - Watershed Protection Plan (WPP) Monitoring Issues</p>	<p>Participant - There is concern that monitoring data collected for WPPs that is routine in nature but includes sites intended as exploratory for verification of sources will be included in the assessment and result in new listings. Many of the streams monitored are ephemeral and therefore essentially runoff only. Biased flow (BF) samples are coded as such and are therefore excluded in the assessment. But, routine samples taken at any time there is water do not have a separate code and perhaps should. Another option would be to include all sites monitored under the WPP as Category 4b. Recreational Use Attainability Analyses are also an option.</p>	<p>TCEQ - This is increasingly an issue as WPPs are more commonly undertaken. There are 2 questions: 1) How should monitoring small intermittent streams that are mainly flowing as runoff events be revised? 2) How should WPP samples be handled with regard to IR assessment?</p>
	<p>Participant - The City of Austin found that there were high bacteria counts in all streams during runoff events.</p>	
	<p>Participant - It seems there are 3 options: 1)RUAA, 2)Code data for WPP or TMDL, and 3) Use something like the drought evaluation as a means for data exclusion.</p>	
	<p>Participant - This is an issue for data providers in that it may cause them to bias routine sampling away from wet weather.</p>	
<p>TDS Conversion</p>	<p>Participant - Regarding the change from lab determination of total dissolved solids (TDS) to the calculation of TDS (measured specific conductance * 0.65), will the calculation formula be included in the Texas Surface Water Quality Standards (TSWQS)?</p>	<p>TCEQ - The conversion factor from conductivity to TDS isn't in the standards because it is not considered to be a Clean Water Act actionable item. In other words, the EPA does not consider it to be a rule stemming from the Clean Water Act so they cannot take action to either approve or disapprove it and it should exist in a different document. In this case, that document is the assessment guidance.</p>
	<p>Participant - The 0.65 correction factor is not applicable to all sampling sites. We would like the option of determining site-specific correction factors for calculating TDS and has a concern that the TSWQS would exclude that option.</p>	<p>TCEQ - Developing site specific conversion factors is permissible. Stream TDS criteria developed using conductivity and the 0.65 CF; if a new conversion factor is developed a new stream standard will need to be calculated and the adopted.</p>
	<p>Participant - Why are lab determinations of TDS being replaced?</p>	<p>TCEQ - Since specific conductance data are being used to set the criterion, the TCEQ Houston lab suggested discontinuing the lab calculation of TDS due to increased cost and staff effort and relying on the calculated values.</p>

# 2014 Integrated Report - TCEQ Guidance Advisory Workgroup Meeting Notes

June 6, 2013

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Oyster Water Use Assessment	Participant - Are there not prohibited oyster water areas in the Houston Ship Channel?	TCEQ - No. No real collection of oysters there, so it is not assessed (NA).
	Participant - Oso Bay is currently non-support (NS) for oyster water use. Will that change?	TCEQ - Yes, the original listing was due to administrative reasons, so it will be changed to NA.
	Participant - For changes to water bodies where the assessment will be changed to NA, is TCEQ collecting data in those areas?	TCEQ - Yes, Enterrococcus data is being collected. Since that data cannot be used for oyster water use assessment, the use would remain NA for those areas. We will confine our assessment units to offshore areas and not to a strip of beach. Only open waters will be assessed for oyster water use.
	Participant - Just to clarify, administrative changes for current NS oyster waters are just that - administrative and will now be NA in those situations.	TCEQ - Yes.
Water Quality Standards Update	Participant - What is the reason for the Oso Bay standards disapproval?	TCEQ - Surrounding areas are meeting the WQS and only a small portion of the bay is not attaining WQS. WQS attainment is only a problem in a small area of the Bay.
	Participant - What is the status of the nutrient criteria approval?	EPA - Action letter is routing for management approval and includes a mix of approvals and disapprovals, possible approval letter in the near future. TCEQ - At this point it is unlikely that nutrient criteria will be assessed.
	Participant - What is that status of the North Sulfur River WQS changes	TCEQ - Standard changed approved by EPA, however did not approve the limited use.
	Participant - Will TCEQ use the North Sulfur River approach to address site specific criteris in future revisions?	TCEQ - May look at this more in the future, however, it is not something that will be considered for all situations.
	Participants - The North Sulphur River example raises questions about which standard to use when evaluating overall aquatic life use.	TCEQ - Local physical conditions will dictate which WQS to evaluate.
	Participant - North sulphur River represents an example of the existing disconnect between criteria for DO and benthic assemblages.	TCEQ - Decoupling DO and aquatic communities has been implemented in several instances. This practice is included in the guidance that an approved UAA can incorporate a decoupling.
Drought Assessment	Participant - What parameters will be considered as part of the drought assessment.	TCEQ - Presentaiton will provide this information.
	Participant - Will this procedure be extended to areas with wastewater discharges?	TCEQ - This will be part of the assessment and may represent a confounding factor for drought impacts.
	Participant - Did the evaluation consider both positive and negative correlations?	TCEQ - The evaluation considered both positive and negative correlations.

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	Participant - What would be the trigger for the drought assessment?	TCEQ - This will be evaluated at the assessment unit level and only looking at new listings and delistings. We will not look at existing listings. If drought can be determined to cause the impairment, the possible alternative would be to assign to Category 4c (impairment due to pollution).
	Participant - Would this look at both physical and biological impairments.	TCEQ - The evaluation would be extended to biological impairments if the data was determined to have been collected during severe drought.
	Participant - There should be concerns about looking at DO values through D4 level drought. You would expect to see correlation between drought and would need to figure out the bounds on the assessment. This should not open the door to a wholesale approach for evaluating drought impacts.	TCEQ - Plots and graphs in the presentation appear that drought could be a major cause for some impairments. This approach will be applied across the board for new impairments and new delistings.
	Participant - Using several sources of information can help provide a defensive evaluation.	
	Participant- The drought assessment should continue through several assessment periods. When would the impairment be delisted out of Category 4c? Would this be delisted due to a WQS change?	TCEQ - A WQS evaluation and revision would not be valid since this data collected from extreme drought conditions for a UAA. WQs includes conditions that allow for data to be excluded.
	Participant - Category 4c represents impairments not caused by pollutant. Nonsupport of a WQS should be a natural condition.	
	Participant - What are other states doing to consider drought impacts?	TCEQ - We are unaware of other methods applied by other states.
	Participant - The method could be evaluated using existing data under several different scenarios.	
	Participant - Drought Mitigation Index integrates many different types of data. It may be difficult to match of the dates for data and drought level.	TCEQ - We will be looking at a range of dates and antecedent conditions. The drought scores will not need to be matched up with the exact date.
	Participant - Would flow data be brought into the evaluation?	TCEQ - Flow will be a consideration.
	Participant - Have you looked at correlations between other parameters?	TCEQ - This may be considered at a later time. There would be limited data which would restrict the number of useful correlations that could be considered.