

2018 Integrated Report (IR) - TCEQ Guidance Advisory Workgroup Written Comments--August 24, 2018

Commenter	Comment	TCEQ Response
Texas TDS Coalition	<p>The Texas TDS Coalition is comprised of representatives of the Texas Association of Clean Water Agencies, Water Environment Association of Texas, and WateReuse Texas. The coalition has been formed to work with the Texas Commission on Environmental Quality (TCEQ) to identify modifications to the implementation of water quality standards for dissolved salts in Texas waters that are consistent with the current capabilities of dischargers to manage dissolved salts.</p> <p>On August 24, 2018, a Surface Water Quality Monitoring Guidance Advisory Work Group Meeting was conducted by the TCEQ. The purpose of the meeting was to discuss revisions to the Assessment Guidance for the 2018 Integrated Report (2018 IR). A major topic discussed was assessment methods for data collected during drought conditions.</p> <p>The methods used to assess data collected during drought conditions for the 2016 Integrated Report were summarized at the meeting. Questions about how these methods could be revised to assess data collected during drought conditions for the 2018 IR were presented. The following are responses to these questions that the TDS Coalition would like to suggest for the TCEQ consideration:</p> <p>1. Can one method be applied to all water quality parameters?</p> <p>The method for assessing data for dissolved salts (total dissolved solids, sulfate, and chloride) that are collected during drought conditions should not be the same as the method applied for other parameters. The dissolved salts water quality standards are based on historical conditions and not for the protection of specific uses. It is not unexpected that during extreme drought conditions concentrations of dissolved salts may be present that are not within historical limits; however, these levels may not be indicative of use impacts.</p>	<p>(1) The TCEQ acknowledges this comment. The method for excluding drought data, which was applied only to nutrient assessments in reservoirs for the 2016 IR, will be applied to all new impairments in reservoirs in the 2018 IR. This includes removing all data within extreme drought periods for any new impairments for total dissolved solids (TDS), sulfate, and chloride, and then re-running the assessment to determine the final category of use attainment.</p> <p>(2) The TCEQ acknowledges this comment. For the purposes of the 2018 IR, the onset and conclusion of drought will be treated the same for all parameters</p>

	<p>2. Should the onset and conclusion of drought conditions be different for different parameters?</p> <p>The determination of the onset and conclusion of drought conditions should be different for dissolved salts. Unlike with other parameters, the quality of a water body may be affected by drought conditions in a watershed that serves as a water supply for a facility that discharges to the affected watershed. Many streams during drought conditions are effluent dominated and, therefore, could be impacted by drought conditions in a water supply source. The application of the Drought Severity Index (DSI) weighted average only, for the receiving stream when determining onset and conclusion of drought conditions, may not sufficiently reflect the impacts of drought on water quality.</p> <p>3. What additional information or best professional judgement could be used to assess drought conditions and how to determine when or if water quality data should be excluded?</p> <p>The following should be considered:</p> <ul style="list-style-type: none"> • Source of dissolved salts, • Feasibility to remove the dissolved salts from the waters, • Appropriateness of changing the water supply strategies used during a drought, and • Whether the exceedance of a dissolved salt standard contributes to adverse environmental impacts. <p>4. Are there other options that TCEQ has not explored?</p> <p>The TCEQ should designate segments that are determined to exceed dissolved salt water quality standards in Category 4 and not in Category 5. It is not practical to conduct a dissolved salts TMDL for a segment that has been impacted by drought conditions; and because the TCEQ Procedures to Implement the Texas Surface Water Quality Standards prohibit an increase in the loading of a pollutant listed in Category 5, such a listing will impact economic growth in the entire watershed of the listed waterbody. All new discharges and all discharge expansions will increase the load of dissolved salts in the waterbody, even if the concentration</p>	<p>(new impairments only) in reservoirs. The TCEQ will continue to investigate options for determining drought impacts in streams for future Integrated Reports.</p> <p>(3) The TCEQ acknowledges this comment. For the purposes of the 2018 IR, the onset and conclusion of drought will be treated the same for all parameters (new impairments only) in reservoirs. The TCEQ will continue to investigate options for addressing data collected during extreme hydrologic conditions for future Integrated Reports.</p> <p>(4) The approach of including dissolved salt impairments in Category 4 of the Integrated Report is not an option for drought impacted impairments. The EPA defines a Category 4c Impairment as one that is impaired due to other types of pollution (flow or habitat alteration). Thus, in drought situations, where impairments cannot be attributed to human-induced alterations, Category 4c would not be applicable. The TCEQ will continue to investigate options for addressing data collected during extreme hydrologic conditions for future Integrated Reports.</p>
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	<p>of dissolved salts in the discharge is below the water quality standard for the stream.</p>	
<p>Texas Parks and Wildlife Department (TPWD)</p>	<p>TPWD would like to offer the following comments on the meeting of the Guidance Advisory Work Group (GAWG) for the 2018 Integrated Report on August 24, 2018. TPWD appreciates the opportunity to participate in these meetings and to offer input on the Integrated Report process.</p> <p>Regarding the flow charts for Numeric and Narrative Reservoir Nutrient Criteria, while TPWD appreciates the availability of the handout and slides presented at the meeting, it would be very helpful to obtain any written reports on this proposal; how it was developed, precisely how the decision matrix will be applied, and how accurately it characterizes and predicts nutrient impairments and concerns in reservoirs. We also request an opportunity to discuss this flow chart in more detail with TCEQ staff as it was not possible to fully digest and identify potential issues with this methodology at the meeting where only two examples were provided. Written information and a separate meeting would allow for a full discussion on this proposal.</p> <p>In reviewing the decision-making flow chart for Narrative Reservoir Nutrient Criteria, TPWD suggests that the box on the right hand side of the flow chart that presently reads “Does median Secchi depth exceed threshold AND Is DO listed as a concern or impairment in the Texas Integrated Report?” be changed to read “Does median Secchi depth exceed threshold OR Is DO listed as a concern or impairment in the Texas Integrated Report?”. Since this side of the chart deals with situations where insufficient data is available to detect a 10 year trend in TSI, most likely there would never be an instance where enough Secchi and DO data was available to warrant an “AND” rather than an “OR” and therefore could never result in a concern for screening level. “OR” is used in the box at the bottom center of the flow chart (likely for the same reason).</p> <p>TPWD also recommends that “Chl-a TSI” be replaced with “TSI”. This will make it clear that the >10 and >40 values concern a change in TSI score, not Chl-a in mg/L.</p>	<p>The TCEQ acknowledges this comment. In addition to the information provided at the Guidance Advisory Workgroup meeting, the TCEQ met with TPWD, at their request, to discuss the procedures to implement the reservoir nutrient criteria in assessments. Procedures to implement the reservoir nutrient criteria in assessments were first introduced during the 2016 Guidance Advisory Workgroup meeting held in July 2015 and documented in the 2016 Texas Integrated Report assessment guidance. Appendix F of the assessment guidance describes the procedures to conduct the assessment. It describes the criteria and thresholds used, and confidence levels for narrative and nutrient criteria are also included. References for criteria\thresholds used in the procedure are also cited in the assessment guidance.</p> <p>Upon reviewing the portion of the narrative criteria flow chart associated with secchi depth and dissolved oxygen, a review of the reservoir data from the 2016 IR shows that there are four instances where a TSI trend is not available, but there is sufficient data for secchi and TSI in the seven-year period to evaluate against the threshold. One of these cases produce concerns for screening level; therefore, “AND” will not be changed to “OR” so that consistency is maintained with the outcome on the other side of the flow chart where a 10 year trend in chlorophyll <i>a</i> TSI is available.</p> <p>The term “Chl-a TSI” will be retained so it is understood which TSI score from the Carlson’s report was used in the flow chart.</p>

	Thank you again for the opportunity to comment on this matter. In the future, a comment period of longer than one week would be greatly appreciated.	
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