



UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION 10

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Seattle, WA 98101-3123

WATER  
DIVISION

SEP 23 2019

Susan Braley  
Washington State Department of Ecology  
Water Quality Program  
P.O. Box 47600  
Olympia, WA 98504-7600

RE: The EPA's Comments on the Proposed Revisions to Washington's Water Quality Standards

Dear Ms. Braley:

Thank you for the opportunity to provide comments on the Washington State Department of Ecology's proposed revisions to the numeric criteria for total dissolved gas in the Snake and Columbia rivers and other water quality standards revisions for fresh and marine waters at Chapter 173-201A WAC, filed on July 30, 2019. The EPA appreciates Ecology's efforts to update the state's water quality standards.

The EPA has reviewed Ecology's proposed rule revisions and offers the following comments for your consideration:

The proposed language at WAC 173-201A-200(1)(c)(ii) aquatic life temperature criteria states:

*When the background condition of the water is cooler than the criteria in Table 200 (1)(c), ~~((the allowable rate of warming up to, but not exceeding, the numeric criteria from human actions is restricted as follows:~~*

*~~(A)) incremental temperature increases resulting from individual point source activities must not, at any time, exceed  $28/(T+7)$  as measured at the edge of a mixing zone boundary (where "T" represents the background temperature as measured at a point or points unaffected by the discharge and representative of the highest ambient water temperature in the vicinity of the discharge) ~~(and~~~~*  
*~~(B) Incremental temperature increases resulting from the combined effect of all nonpoint source activities in the water body must not, at any time, exceed  $2.8^{\circ}\text{C}$  ( $5.04^{\circ}\text{F}$ )).~~*

And

The proposed language at WAC 173-201A-210(1)(c)(ii) aquatic life temperature criteria states:

*When the natural condition of the water is cooler than the criteria in Table 210 (1)(c), ~~((the allowable rate of warming up to, but not exceeding, the numeric criteria from human actions is restricted as follows:~~*


*~~(A)) incremental temperature increases resulting from individual point source activities must not, at any time, exceed  $12/(T-2)$  as measured at the edge of a mixing zone boundary (where "T" represents the background temperature as measured at a point or points unaffected by the discharge and representative of the highest ambient water temperature in the vicinity of the discharge) ~~(and~~~~*  
*~~(B) Incremental temperature increases resulting from the combined effect of all nonpoint source activities in the water body must not, at any time, exceed  $2.8^{\circ}\text{C}$  ( $5.04^{\circ}\text{F}$ )).~~*

The EPA recommends that Ecology retains the language "up to, but not exceeding the numeric criteria." Alternatively, the EPA suggests maintaining the intent of the previous rule language to ensure that the

standard is protective of aquatic life and does not allow warming to exceed the numeric criteria when the natural condition of the water is cooler than the numeric criteria.

The EPA appreciates Ecology's commitment to update Washington's water quality standards. We look forward to continuing to engage with you throughout this process. If you have any questions, please contact me at (206) 553-0268 or [Guzzo.Lindsay@epa.gov](mailto:Guzzo.Lindsay@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Lindsay Guzzo". The signature is fluid and cursive, with a large initial "L" and "G".

Lindsay Guzzo  
Water Quality Standards Coordinator