



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

February 20, 2020

Ref: 8WD-CWQ

Ron Steg
Wyoming Department of Environmental Quality
510 Meadowview Drive
Lander, Wyoming, 82520

Re: Draft 2020 Wyoming Integrated Report

Dear Mr. Steg:

We have reviewed Wyoming's draft 2020 Integrated Report (IR) and appreciate the opportunity to provide the following comments.

- 1) The following items are discrepancies found in various locations throughout the draft report. These should be corrected to remove any confusion as to their listed status.
 - a) Both Pacific Creek and Clarks Draw are listed as category 3 in the executive summary, but in the Appendix 305(b) list they are category 2.
 - b) Lander Creek in the executive summary and the 305(b) Appendix C is category 5, but it does not appear on the 303(d) list in Appendix D.
 - c) Flat Creek (WYSR170401030205_02) in the executive summary is category 2, but in 305(b) Appendix C it is category 5 and appears in the 303(d) Appendix D list.
 - d) Brooks Lake is in the 305(b) Appendix C as category 5, but is not in the Appendix D 303(d) list.
 - e) The executive summary has Middle Fork Popo Agie segment WYBH100800030207_04 as delisted, but Table 3 of delisted waters has it as WYBH100800030207_05. In Table 11, both WYBH100800030207_04 and WYBH100800030207_05 are in category 2. WYBH100800030207_05 appears to be the correct identifier since that segment was on the list in 2018.
 - f) Laramie River (WYNP101800100504_01) in Appendix C is listed as category 5, but it is not in the 303(d) list in Appendix D.
- 2) Some of the hyperlinks within the document are not working, especially in Sections 2 and 3. These include important links to documents such as the assessment methodology and monitoring strategy.



Printed on Recycled Paper

- 3) There are some issues with the maps in the document, specifically Figures 7 and 16 appear to be out of date and Figure 25 has category 5 as green not red.
- 4) WDEQ should consider assessing the nutrient, chlorophyll-a, phytoplankton, and cyanotoxin data from Boysen Reservoir for possible impairment. While it is too late to add any results from an assessment to the 2020 Integrated Report, it may be possible to include this work for the 2022 Integrated Report. Wyoming has expressed interest in developing an assessment methodology to interpret narrative standards for nutrients for lakes and reservoirs and eventually streams and rivers. EPA hopes to collaborate with Wyoming to provide technical and contractor assistance for this effort and EPA would support that effort with a goal of having a methodology that could be applied by 2022.
- 5) An assessment of the Wind River below Boysen Reservoir and Badwater Creek should also be performed based on data for parameters associated with oil and gas discharges (used in the March 2019 and January 2020 draft permits for the Aethon discharge) with the goal of an impairment decision by the 2022 Report.

Please contact Tom Johnson at 303-312-6226 (johnson.tom@epa.gov), if you have any questions regarding our comments. We appreciate your diligent work on this report.

Sincerely,



Andrew Todd, Ph.D.
Chief, Water Quality Section
Clean Water Branch

cc: Jason Gildea, 8WD-CWS
Maggie Pierce, 8WD-CWQ
Everett Volk, 8ORC