

APPENDIX N:

INDIANA'S 2016 CONSOLIDATED ASSESSMENT  
AND LISTING METHODOLOGY (CALM)

## **REGULATORY BACKGROUND**

Section 303(d) of the 1972 Federal Clean Water Act (CWA) requires each state to identify those waters that do not meet the state's water quality standards (WQS) for designated uses. For these impaired waters, states are required to establish total maximum daily loads (TMDLs) to meet the state's WQS. In addition, the U.S. EPA has released guidance recommending that states, territories, and authorized tribes submit an Integrated Water Quality Monitoring and Assessment Report (IR) that will satisfy the CWA requirements for both the Section 305(b) water quality report and Section 303(d) List of Impaired Waters. Indiana Department of Environmental Management (IDEM) has integrated this guidance into its Consolidated Assessment and Listing Methodology (CALM).

## **IDEM'S SURFACE WATER QUALITY MONITORING STRATEGY**

IDEM has developed a water quality monitoring strategy (WQMS) that guides both its surface water quality and ground water quality monitoring activities. The goals of the WQMS in collecting surface water quality, biological, and habitat data are to:

- Assess all waters of the state to determine if they are meeting their designated uses and to identify those waters that are not.
- Support Office of Water Quality (OWQ) programs including water quality standards (WQS) development, National Pollutant Discharge Elimination System (NPDES) permitting and compliance.
- Support public health advisories and address emerging water quality issues.
- Support watershed planning and restoration activities.
- Determine water quality trends and evaluate performance of programs.
- Engage and support a volunteer monitoring network across the state.

To achieve these goals, IDEM employs the following monitoring programs:

- Probabilistic monitoring in one basin per year on a 9-year rotating basin cycle
- Trophic status monitoring of 80/320 lakes a year by the Indiana University School of Public and Environmental Affairs (IU SPEA) Clean Lakes program
- Fixed station monitoring at 165 sites across the state
- Fish tissue and sediment contaminants' monitoring on a 5-year rotating basin cycle
- Targeted (watershed characterization) monitoring for TMDL reassessments and development, watershed baseline planning, and performance measures determinations
- Cyanobacteria monitoring of 10-12 lakes
- Thermal verification monitoring
- Special sampling projects
- Hoosier Riverwatch volunteer monitoring

IDEM's 305(b) assessment and 303(d) listing processes follow the probabilistic monitoring rotating basin schedule, which ensures that all basins in the state are assessed at least once every nine years (Figure 1) (IDEM, 2010).

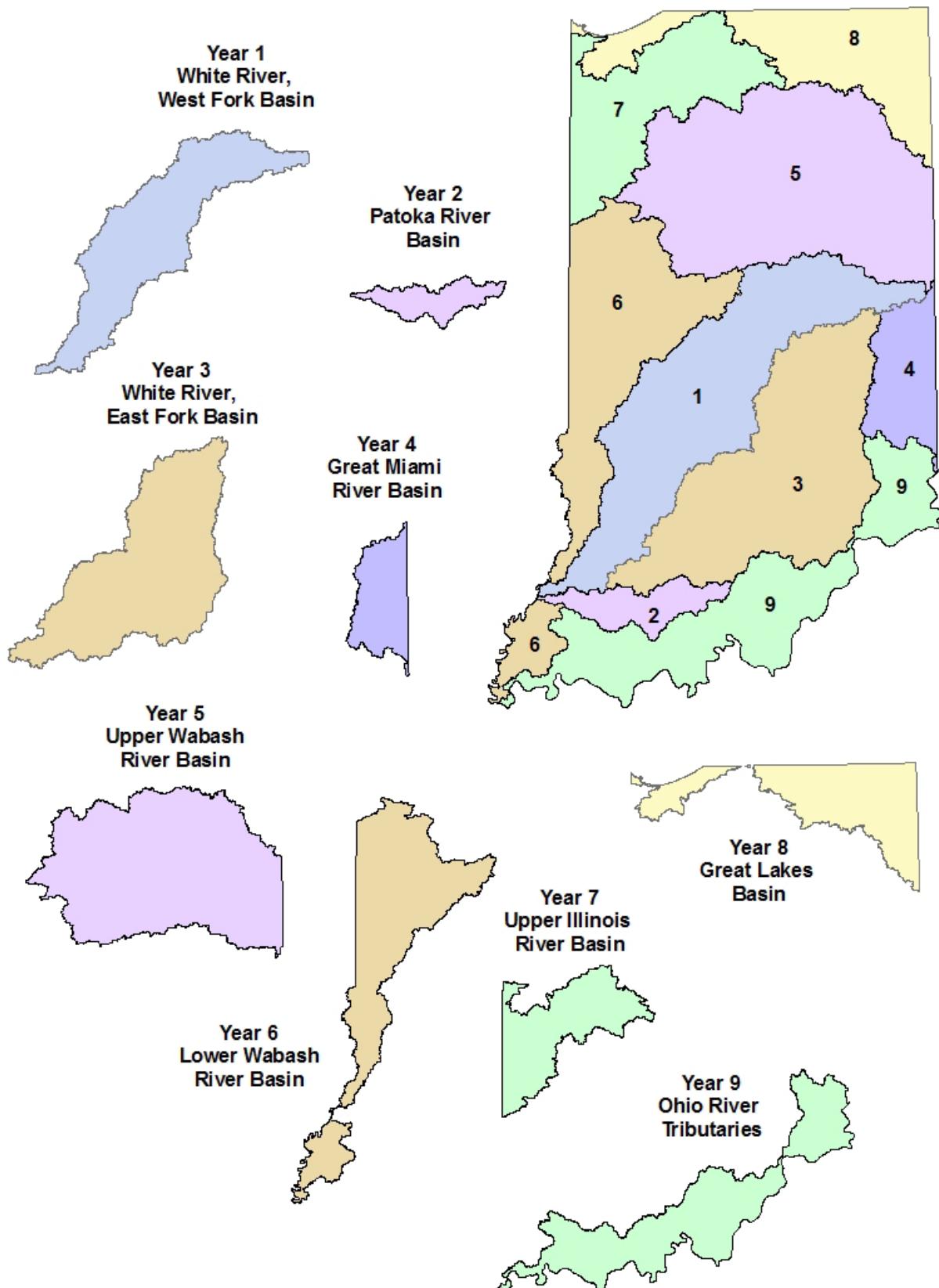


Figure 1: The nine major water management basins in Indiana as defined by IDEM to support the agency's rotating basin monitoring, assessment, reporting, and listing schedule.

Lakes and reservoirs in Indiana are monitored for IDEM by the Indiana Clean Lakes Program (CLP) administered by Indiana University's School of Public and Environmental Affairs. This monitoring does not follow the rotating basin due to the unequal distribution of lakes across the Indiana landscape. In 2010, The Indiana CLP began using a randomized approach to site selection with the goal of providing statistically significant lake water quality data that may eventually be applied to the entire state. From a universe of 320 lakes, 80 are chosen at random to be monitored each year.

## **DESIGNATED USES**

The CWA provides the underpinning for Indiana's WQS, which are articulated in Title 327, Article 2 of the Indiana Administrative Code (IAC) and are designed to ensure that all waters of the state, unless specifically exempted, are safe for full body contact recreation and are protective of aquatic life, wildlife, and human health. These beneficial uses are described in the state's WQS as "designated" uses. IDEM monitors and assesses Indiana's surface waters to determine the extent to which they meet WQS and support their designated uses and to identify, where possible, the sources of impairment for those waters that do not support one or more of these uses.

## **WATER QUALITY ASSESSMENT METHODOLOGY**

Use support status is determined for each waterbody using the assessment guidelines provided in the U.S. EPA's documents regarding the 305(b) and 303(d) reporting methods outlined in the U.S. EPA "Guidance for 2004 Assessment, Listing and Reporting Requirements Pursuant to Sections 303(d), 305(b) and 314 of the Clean Water Act" (U.S. EPA, 2003), and the additional guidance provided in the U.S. EPA's memorandums containing information concerning CWA Sections 303(d), 305(b), and 314 integrated reporting and listing decisions for the 2006, 2008, 2010, 2012, 2014, and 2016 cycles (U.S. EPA, 2005-2015). Available results from the following six types of monitoring data listed below are integrated to provide an assessment for each stream waterbody for 305(b) reporting and 303(d) listing purposes:

- Physical or chemical water results.
- Fish community assessment.
- Benthic aquatic macroinvertebrate community assessments.
- Fish tissue and contaminant results.
- Habitat evaluation.
- E. coli monitoring results.

## **WATERBODY ASSESSMENT UNITS**

IDE� maintains its CWA Section 305(b) assessment and 303(d) listing information in the Assessment Database (ADB). Each waterbody assessment unit (AU) is assigned a unique identifier in the ADB to which all assessment information for that waterbody is associated. This identifier is referred to as the assessment unit identifier (AUID).

In general, each AUID corresponds to the watershed in which it is located as defined by the United States Geological Survey (USGS) hydrologic unit code (HUC) system, which is a hierarchical system that divides and then subdivides the United States into successively smaller geographic areas based on surface hydrologic features or drainages. Under this system, the average size of an 8-digit hydrologic unit area in Indiana, commonly known as a subbasin, is about 448,000 acres (700 square miles). The 12- and 14-digit hydrologic unit areas, or subwatersheds, within an 8-digit hydrologic unit area are much smaller. The 12- and 14-digit hydrologic unit areas in Indiana range in size from less than five acres (less than one hundredth of a square mile) to about 28,000 acres (almost 44 square miles).

The geographical extent and location of each AU within a given 12- or 14-digit HUC are defined for mapping purposes through a process called reach indexing. Reach indexing uses software tools that work with geographical information system (GIS) applications to delineate for a waterbody one or more units of assessment and to “key” these AUs (as defined by IDEM) to the National Hydrography Dataset (NHD)<sup>1</sup>. This “key” is called the Reach Index. IDEM’s Reach Index facilitates mapping of Indiana’s 305(b) assessments and 303(d) listings in GIS applications, and then incorporates this information into IDEM’s ADB and the U.S. EPA’s national databases.

In these databases, Indiana lakes and reservoirs, including Lake Michigan, are assigned a single AUID with sizes reported in acres. Each lake in IDEM’s ADB is presently associated with the 14-digit HUC in which it resides. As time allows, IDEM will begin associating lakes with their 12-digit HUC to better support IDEM’s nonpoint source program, which has adopted the 12-digit HUC scale for watershed management planning and implementation purposes.

Indiana’s Lake Michigan shoreline is divided into reaches and assigned an AUID in accordance with the 8-digit HUC in which each shoreline reach is located. The shoreline is measured and reported in miles.

With the exception of the Ohio River whose AUIDs are likewise associated with their 8-digit HUCs, rivers and streams in IDEM’s ADB are also divided into reaches with each one assigned a unique AUID in accordance with the 12-digit HUC in which it is located. River and stream reaches are measured in miles. Their sizes vary widely, and a single AU may or may not represent the entire stream to which it is associated.

The size of stream AUs is determined in large part by the hydrology of a system. This is because the mechanisms of large streams and rivers are very different from those of small streams and tributary systems thereby making it logical to separate these into individual AUs. Other factors, such as the following, are also considered when deciding how to define a water quality AU:

- Varying land uses within a watershed are considered because rural development can have different impacts on a stream than urban areas. This, in turn, has different impacts on a stream segment than do forested areas.
- The presence and locations of any permitted wastewater discharge facilities are considered because the volume of their discharges can impact the hydrology of the receiving stream. The chemical makeup of their effluent can also impact water quality depending on the type of facility and whether the facility is operating efficiently.
- IDEM also considers any other known factors that might reasonably be expected to impact hydrology or water quality, or both, such as the presence of dams and wetlands, and whether the stream has been channelized.
- Aerial photography provides additional information about the presence and thickness of riparian buffers, the presence and spatial extent of rural development, and the types of land use practices in the watershed.

All of these factors can help determine where differences in water quality might be expected to result. Due to the potential impacts these factors can have on stream water quality, they are all evaluated together when determining whether and where segmentation should occur along the stream reach.

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<sup>1</sup> The NHD is a database created by the U.S. EPA and the United States Geological Survey that provides a comprehensive coverage of hydrographic data for the United States. It uniquely identifies and interconnects the stream segments that comprise the nation’s surface water drainage system and contains information for other common surface waterbodies such as lakes, reservoirs, estuaries, and coastlines.

## WATER QUALITY ASSESSMENT DECISIONS

The designated uses outlined in Indiana's WQS and the narrative and numeric criteria to protect them provide the underpinning for IDEM's 305(b) assessment process and 303(d) listing decisions. Water quality assessments are made by compiling existing and readily available data from site-specific chemical (water, sediment, and fish tissue), physical (habitat and flow), biological (fish and macroinvertebrate communities), and bacteriological (*E. coli*) monitoring of Indiana's rivers, streams, and lakes and evaluating those data against Indiana's WQS. Waters identified as not meeting one or more of their designated uses are then placed on the Indiana's 303(d) List of Impaired Waters. IDEM's decision-making criteria include a combination of the narrative and numeric criteria stated in Indiana's WQS in IAC 327, Article 2. More detailed information regarding IDEM's WQS-based approach to evaluating fish tissue data and IDEM's use of site-specific water quality criteria in the 305(b) assessment process is also provided in later sections of this document.

Table 1: Minimum data requirements for CWA 305(b) assessments.

Parameter Type	Minimum Information Required for Assessment	Index Period
<b>Aquatic Life Use Support – Rivers and Streams</b>		
Toxicants	Minimum of three measurements	Most recent five consecutive years
Conventional Inorganics	Minimum of three measurements	Most recent five consecutive years
Nutrient Parameters	Minimum of three measurements and two or more of parameters must have been exceeded on same date in order to classify a waterbody as impaired.	Most recent five consecutive years
Benthic aquatic macroinvertebrate Index of Biotic Integrity (mIBI)	Minimum of one measurement, preferably with corresponding qualitative habitat use evaluation (QHEI) score*	Most recent five consecutive years
Fish community (IBI)	Minimum of one measurement, preferably with corresponding qualitative habitat use evaluation (QHEI) score*	Most recent five consecutive years
*The Qualitative Habitat Evaluation Index (QHEI) is not required to determine aquatic life use support but is used, when available, in conjunction with macroinvertebrate community scores (mIBI) or fish community scores (IBI), or both, to evaluate the role that habitat plays in waterbodies where impaired biotic communities (IBC) have been identified.		
<b>Aquatic Life Use Support – Lakes and Reservoirs</b>		
Indiana Dept. of Natural Resources (IDNR) surveys of the status of sport fish communities in lakes	No minimum sample requirement. Assessments are revised with most recent plans published by IDNR.	
IDNR Trout Stocking Plans	No minimum sample requirement. Assessments are revised with most recent plans published by IDNR.	
IDNR information on pH levels in lakes and reservoirs	No minimum sample requirement. Assessments based on narrative reports and communication from IDNR staff.	
Temperature	No minimum sample requirement. Assessments for lake temperatures are not a regular part of IDEM's assessment process. All data are reviewed when readily available and adequacy of the data set as a whole is determined on a case-by-case basis.	

Parameter Type	Minimum Information Required for Assessment	Index Period
<b>Fish Consumption Use Support (Human Health)</b>		
PCBs in Fish Tissue	One actual concentration value for the site for a single species and size class	Most recent 12 consecutive years
Mercury in Fish Tissue	One trophic level weighted arithmetic mean concentration value calculated on all samples from the site from a single sampling event	Most recent 12 consecutive years
<b>Recreational Use Support (Human Health) – All Waters</b>		
Bacteria (E. coli)	Minimum of ten grab samples or one geometric mean result calculated from five equally-spaced samples over thirty days.	Most recent five consecutive years
<b>Recreational Use Support (Aesthetics) – Lakes and Reservoirs</b>		
Natural Lakes and Reservoirs	Minimum of three total phosphorus results with corresponding Chlorophyll a results collected over three years (consecutive or nonconsecutive). All readily available data for a given lake that meets IDEM's data quality requirements are evaluated for potential use in assessments.	
<b>Drinking Water Use Support – Rivers and Streams</b>		
Toxicants	Minimum of three measurements collected within the same year at least one month apart.	Most recent five consecutive years
Conventional Inorganics	Minimum of three measurements collected within the same year at least one month apart.	Most recent five consecutive years
<b>Drinking Water Use Support – Lakes and Reservoirs</b>		
Applications for permits to apply algaecides	One permit application.	Most recent five consecutive years
Taste and odor- producing substances	No minimum sample requirement. Weight of evidence approach is used. An assessment of impairment typically requires numerous public complaints regarding taste and odor such that water utility must employ additional treatment to remedy the problem.	

Chemical data for toxicants [dissolved metals, polynuclear aromatic hydrocarbons (PAHs), pesticides, ammonia, and free cyanide], conventional water chemistry parameters (dissolved oxygen, pH, temperature, and anions), and bacteria (E. coli) were evaluated for compliance with Indiana's WQS found at 327 IAC 2-1-6 and 327 IAC 2-1.5-8. U.S. EPA 305(b) guidelines were applied to chemical and biological data as indicated in Guidelines for Preparation of the State Water Quality Assessments (305(b) Reports) and Electronic Updates: Supplement (U.S. EPA, 1997).

Table 1 shows the minimum data required for 305(b) assessments. For each AU with sufficient data to make one or more designated use assessments, IDEM applies the 305(b) assessment process described in Table 2. Assessment data are integrated for the purposes of making water quality assessments, meaning that all data for a given waterbody are considered together. In accordance with U.S. EPA policy, IDEM generally treats each type of data as independently applicable.

Table 2: Water quality assessment methodology for determining designated use support for all waters except the Ohio River.

<b>Aquatic Life Use Support - Rivers and Streams</b>			
		Dissolved metals, pesticides, polynuclear aromatic hydrocarbons (PAHs), free cyanide, and ammonia were evaluated on a site-by-site basis and judged according to the magnitude of the exceedance(s) of Indiana's WQS and the number of times the exceedance(s) occurred. For any one pollutant (grab or composite samples), the following assessment criteria are applied to data sets consisting of three or more measurements.	
		<b>Fully Supporting</b>	<b>Not Supporting</b>
		No more than one exceedance of the acute or chronic criteria for aquatic life within a three year period <sup>2</sup> .	More than one exceedance of the acute or chronic criteria for aquatic life within a three year period.
		Dissolved oxygen, pH, sulfate, and chloride were evaluated for the exceedance(s) of Indiana's WQS. For any one pollutant, the following assessment criteria are applied to data sets consisting of three or more measurements.	
		<b>Fully Supporting</b>	<b>Not Supporting</b>
		Criteria are exceeded in less than or equal to 10% of measurements.	Criteria are exceeded in greater than 10% of measurements.
		Nutrient conditions were evaluated on a site-by-site basis using the benchmarks described below. In most cases, two or more of these conditions must be met on the same date in order to classify a waterbody as impaired. This methodology assumes a minimum of three sampling events: <ul style="list-style-type: none"> <li>• Total Phosphorus -- One or more measurements greater than 0.3 mg/L</li> <li>• Nitrogen (measured as NO<sub>3</sub> + NO<sub>2</sub>) -- One or more measurements greater than 10.0 mg/L</li> <li>• Dissolved Oxygen (DO) -- One or more measurements below the water quality standard of 4.0 mg/l or measurements that are consistently at/close to the standard, in the range of 4.0-5.0 mg/L or values greater than 12.0 mg/L</li> <li>• pH measurements -- One or more measurements exceed the water quality standard of no more than 9.0 pH units or measurements are consistently at/close to the standard, in the range of 8.7- 9.0 pH units</li> <li>• Algal Conditions -- Algae are described as "excessive" based on field observations by IDEM scientists.</li> </ul>	
		<b>Fully Supporting</b>	<b>Not Supporting</b>
		mIBI greater than or equal to 36	mIBI less than 36
		IBI greater than or equal to 36	IBI less than 36

<sup>2</sup> For Indiana waters within the Great Lakes Basin, acute aquatic criteria refer to the "criterion maximum concentration (CMC) identified in 327 IAC 2-1.5, and the chronic aquatic criteria refer to the criterion continuous concentration (CCC) also described therein. For downstate waters (those located outside of the Great Lakes Basin, the acute aquatic criteria refer to the "AAC" values shown in 327 IAC 2-1 and the chronic aquatic criteria are shown as the "CAC" values.

<b>Aquatic Life Use Support – Rivers and Streams</b>				
Qualitative habitat use evaluation (QHEI) (Range of possible scores is 0-100)	<p>The Qualitative Habitat Evaluation Index (QHEI) is not used to determine aquatic life- use support. Rather, the QHEI is an index designed to evaluate the lotic habitat quality important to aquatic communities and is used in conjunction with mIBI or IBI data, or both, to evaluate the role that habitat plays in waterbodies where impaired biotic communities (IBC) have been identified. QHEI scores are calculated using six metrics: substrate, instream cover, channel morphology, riparian zone, pool/riffle quality, and gradient. A higher QHEI score represents a more diverse habitat for colonization of aquatic organisms. IDEM has determined that a QHEI total score of &lt;51 indicates poor habitat. For streams where the macroinvertebrate community (mIBI or mHab) or fish community (IBI) scores indicate IBC, QHEI scores are evaluated to determine if habitat is the primary stressor on the aquatic communities, or if there may be other stressors/pollutants causing the IBC.</p>			
<b>Aquatic Life Use Support – Lakes and Reservoirs</b>				
Indiana Department of Natural Resources surveys of the status of sport fish communities in lakes and information on trout stocking.	<b>Fully Supporting</b>	<b>Not Supporting</b>		
Temperature and pH	<p>Supports cold water fishery, including native Cisco and stocked trout, or both.</p> <p>Lakes in which thermal modifications have caused an adverse effect on aquatic life and lakes that do not meet Indiana's WQS for pH have been assessed as not supporting of aquatic life use.</p>			
<b>Fish Consumption Use Support (Human Health) – All Waters</b>				
<p>Available fish tissue data for the most recent 12 years of data collection are evaluated. Only waters for which sufficient fish tissue data were available were assessed for fish consumption. All results from sampling locations considered representative of a given assessment unit (lake or reservoir; stream or stream reach) must be below the benchmarks for mercury and PCBs in order to be assessed as fully-supporting. For mercury, all waters with a trophic level weighted arithmetic mean result (calculated with all the samples collected during the same sampling event) that exceeds the applicable benchmark are classified as impaired. For PCBs, all waters with a single sample result for a given species exceeding the applicable benchmark are classified as impaired.</p>				
Mercury in Fish Tissue	<b>Fully Supporting</b>	<b>Not Supporting</b>		
PCBs in Fish Tissue	<b>Fully Supporting</b>	<b>Not Supporting</b>		
	Actual concentration values for all samples are less than or equal to 0.02 mg/kg wet weight	Actual concentration values for one or more samples are greater than 0.02 mg/kg wet weight		

### Recreational Use Support (Human Health) – All Waters

IDEML has two different methods for determining recreational use support, depending on the type of data set being used in making the assessment. For data sets consisting of five equally-spaced samples over a 30-day period, IDEML applies two tests, both of which are based on the U.S. EPA's Ambient Water Quality Criteria for Bacteria - 1986 (U.S. EPA, 1986), which provides the foundation for Indiana's WQS for recreational use. For data sets with 10 or more grab samples but without the five samples equally-spaced over the 30 days required to calculate a geometric mean, the 10% rule is applied. When both types of data sets are available, the assessment decision is based on the data set consisting of five samples, equally-spaced over a 30-day period.

Bacteria (E. coli): at least five equally-spaced samples over 30 days. (cfu = colony forming units)	Fully Supporting	Not Supporting
	Geometric mean does not exceed 125 cfu/100mL	Geometric mean exceeds 125 cfu/100mL.
Bacteria (E. coli): grab samples (cfu = colony forming units)	Not more than 10% of measurements are greater than 576 cfu/100ml (for waters infrequently used for full body contact) or 235 cfu/100mL (for bathing beaches) <sup>3</sup> . And Not more than one sample is greater than 2,400 cfu/100mL.	More than 10% of samples are greater than 576 cfu/100mL or more than one sample is greater than 2,400 cfu/100mL.

### Drinking Water Use Support – Rivers and Streams

River and stream segments are designated for drinking water uses if a community water supply has a drinking water intake somewhere along the segment. When IDEML has data for a segment with a drinking water intake, those data are compared to the applicable ambient water quality criteria in Indiana's WQS to determine if the drinking water use is met. The appropriate water quality criteria are applied for specific substances identified in the WQS. Information regarding non-naturally occurring taste and odor-producing substances not specifically identified in the WQS are reviewed within the context of a water treatment facility's ability to meet Indiana's drinking WQS using conventional treatment.

Toxicants	Dissolved metals, pesticides, PCBs, and free cyanide were evaluated on a site by site basis and judged according to magnitude of the exceedance(s) of Indiana's WQS for point-of-water intake and the number of times exceedance(s) occurred. For any one pollutant (grab or composite samples), the following assessment criteria are applied.	
	Fully Supporting	Not Supporting
Conventional inorganics	Not more than one exceedance of the acute or chronic criteria for human health within a three year period.	More than one exceedance of the acute or chronic criteria for human health within a three year period.
	Fully Supporting	Not Supporting
	Not more than one exceedance of the acute or chronic criteria for human health within a three year period.	More than one exceedance of the acute or chronic criteria for human health within a three year period.

<sup>3</sup> The value of 576 cfu/100mL comes from U.S. EPA's Ambient Water Quality Criteria for Bacteria - 1986 (U.S. EPA, 1986) and represents the single sample maximum applicable to waters infrequently used for full body recreation. For data collected from bathing beaches, the single day maximum value of 235 cfu/100mL is applied.

Recreational Use Support (Aesthetics) – Lakes and Reservoirs		
	Fully Supporting	Not Supporting
Natural Lakes	<p>Not more than 10% of all TP values greater than 54 ug/L and their associated Chlorophyll a values are less than or equal to 20 ug/L</p>	<p>Less than 10% of all TP values are greater than 54 ug/L but their associated Chlorophyll a values are greater than 20 ug/L, and the TSI (CHL) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 54 ug/L with associated Chlorophyll a values less than 4 ug/L, but the TSI (CHL) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 54 ug/L with associated Chlorophyll a values greater than 4 ug/L</p>
Reservoirs	<p>Not more than 10% of all TP values greater than 51 ug/L and their associated Chlorophyll a values are less than 25 ug/L</p>	<p>Less than 10% of all TP values are greater than 51 ug/L but their associated Chlorophyll a values are greater than 25 ug/L and the TSI (CHL) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 51 ug/L with associated Chlorophyll a values less than 2 ug/L, but the TSI (CHL) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 51 ug/L with associated Chlorophyll a values greater than 2 ug/L</p>

Drinking Water Use Support – Lakes and Reservoirs		
	Fully Supporting	Not Supporting
Taste and odor-producing substances	Taste and odor substances not present in quantities sufficient to interfere with production of drinking water by conventional treatment	Taste and odor substances present in quantities requiring additional treatment by the public water supply to prevent taste and odor problems
Information on the application of pesticides to surface drinking water reservoirs	Reservoirs or lakes that serve as source water for public water supplies that received pesticide (algaecide) application permits for algae were classified as not supporting because additional treatment by the public water supply was required to prevent taste and odor problems.	
Other Assessments – Lakes and Reservoirs		
Carlson's Trophic State Index (TSI) for Chlorophyll a (CHL)	Chlorophyll <i>a</i> results were used to calculate Carlson TSI scores. Trophic scores were used to classify lakes according to their trophic state. Lake trends were also assessed for lakes with two or more trophic scores if at least one of the scores was less than five years old. Trophic scores and lake trends are not used to determine use support status. These assessments are conducted to fulfill Clean Water Act Section 314 reporting requirements for publicly owned lakes and reservoirs.	

## IDEM'S USE OF SITE-SPECIFIC CRITERIA

Indiana's WQS contain provisions for the calculation of site-specific criteria (SSC) for the protection of aquatic life and human health in order to provide:

- (1) An additional level of protection; or
- (2) Less stringent criteria in cases where it can be shown that site-specific conditions indicate the criterion contained in Indiana's WQS for the pollutant in question is unnecessarily stringent<sup>4</sup>.

SSC are typically developed for the NPDES program on a case-by-case basis to ensure that the specific pollutant or pollutants contained in a permitted discharge do not impair aquatic life or human health use support.

The SSC expressed in Indiana's WQS apply only to the stream or stream reach and the pollutant for which they were calculated. IDEM has been generally unable to apply SSC in its assessment processes because of the way assessment units are defined. Few SSC are broadly applicable to the basin in which they are located. Therefore, in order to apply SSC, the AU must match the reach to which the criterion applies both in terms of its location and length.

In most cases, the AU as a whole is larger than the reach to which the SSC applies. Therefore, applying a site-specific criterion to the entire AU would result in the criterion being used to assess the water quality condition for the entire waterbody as opposed to the specific reach to which it applies. In the past, IDEM's policy in these cases has been to give precedence to the ambient water quality criterion expressed in the state's WQS.

IDEM has the necessary internal processes in place to make the changes in segmentation that are needed to more accurately apply SSC. Such changes require close coordination between IDEM's NPDES, WQS, and 305(b) and 303(d) programs. Given the scientific and regulatory complexities involved, changes in segmentation for these reasons are rare and must necessarily be considered on a case-by-case basis.

In 2010, IDEM re-indexed the Grand Calumet River to accommodate the application of a SSC

<sup>4</sup> The procedures used to calculate SSC are provided in 327 IAC 2-1.5-16 for waters within the Great Lakes Basin and 327 IAC 2-1-8.9 for non-Great Lakes Basin ("downstate") waters.

for free cyanide to a one-mile reach of the river<sup>5</sup>, which is the only waterbody in the Great Lakes basin that has SSC. Indiana's WQS contains SSC for various substances in downstate waters as well<sup>6</sup>, including six miles of the Wabash River, seven miles of the West Fork of the White River, and a reach of Richland Creek in Gibson County, Indiana. IDEM plans to re-index these waters to apply their SSC as staff resources allow.

## OHIO RIVER ASSESSMENTS

IDE� collaborates with the Ohio River Valley Water Sanitation Commission (ORSANCO) to conduct water quality assessments of the Ohio River reaches that border Indiana. ORSANCO is an interstate water pollution control agency for the Ohio River established through a compact agreement between member states and approved by Congress in 1948. The compact can be found online at: <http://www.orsanco.org/orsanco-compact>. Under the terms of this agreement, member states cooperate in the control of water pollution in the Ohio River Basin.

ORSANCO monitors the Ohio River on behalf of the compact states under CWA Section 305(b) and produces a water quality assessment report of its water quality condition every two years. Although this report identifies water quality issues on the Ohio River, ORSANCO, unlike its compact states, is not required to develop a 303(d) List of Impaired Waters. Identifying Ohio River impairments on a 303(d) list for the purposes of TMDL development is the responsibility of each compact state.

ORSANCO actively works with compact states to review its 305(b) assessment methodologies and revise them as needed. Every two years, ORSANCO prepares a description of the proposed assessment methodology for review by the 305(b) Work Group, which is made up of the state agency personnel responsible for preparing the Integrated Reports in each state and one or more U.S. EPA representatives responsible for reviewing state reports. At this time, provisional assessments based on proposed methods are also presented to the 305(b) workgroup for discussion. ORSANCO works with the 305(b) Work Group to achieve a consensus regarding its assessment methods and water quality assessments based on them. After ORSANCO's methodology and preliminary assessments are approved by the 305(b) Work Group, ORSANCO then presents them to its Technical Committee for final approval.

It is important to note that ORSANCO's assessment and reporting timeline does not correspond with IDEM's publication of its draft 303(d) list for public review and comment. ORSANCO's assessment methodology and its preliminary assessments for each cycle are always completed prior to or during IDEM's development of its draft 303(d) list for that cycle. However, they are considered provisional until presented to ORSANCO's Technical committee for approval, which usually occurs after IDEM has published its draft 303(d) list for public comment.

In order to provide the public with the most current assessment information available for the Ohio River, IDEM includes ORSANCO's preliminary assessments and the methods upon which they are based in Indiana's draft 303(d) list and the CALM published each cycle. It should be understood, however, that ORSANCO's assessment methods as described in the CALM, along with any new Ohio River impairments added to or previously identified and removed from Indiana's draft 303(d) list, are provisional and may change based on approval of ORSANCO's Technical Committee.

ORSANCO's role in completing Ohio River use attainment assessments and developing a biennial report on Ohio River water quality conditions is primarily to facilitate interstate consistency in CWA 305(b) assessments and how impairments are identified on the compact states' 303(d) lists for the

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<sup>5</sup>SSC for the Grand Calumet River are shown in 327 IAC 2-1.5-16, Table 16-1.

<sup>6</sup>SSC for downstate waters are shown in 327 IAC 2-1-8.9, Table 8.9-1.

purposes of TMDL development. However, such consistency is not always possible given the differences in the compact states' WQS and their CWA Sections 305(b) and 303(d) assessment and listing methodologies. Given these differences, the compact states are not obligated to incorporate any or all of ORSANCO's water quality assessments into their own reports. Specifically, U.S. EPA guidance states that "data and information in an interstate commission 305(b) report should be considered by the states as one source of readily available data and information when they prepare their Integrated Report and make decisions on segments to be placed in Category 5; however, data in a 305(b) Interstate Commission Report should not be automatically entered in a state Integrated Report or 303(d) list without consideration by the state about whether such inclusion is appropriate." (U.S. EPA, 2005)

Attachment 1 contains a comparison of the relative stringencies of applicable criteria in ORSANCO's Pollution Control Standards (PCS) and Indiana's WQS, and the different ways in which these criteria are used to determine the degree to which the Ohio River supports aquatic life use, recreational use, and fish consumption. In order to achieve consistency with other compact states, IDEM generally accepts ORSANCO's methods for evaluating the available data for assessment purposes. And, where there are not significant differences between ORSANCO's criteria and those expressed in Indiana's WQS, IDEM incorporates ORSANCO's assessments directly into its Integrated Report and 303(d) list, applying them to the corresponding reaches defined in IDEM's ADB. However, in cases where the water quality criteria ORSANCO uses are less stringent than the water quality criteria expressed in Indiana's WQS, its methods for applying them are significantly inconsistent with IDEM's assessment methodology, or both situations exist, ORSANCO's data are evaluated against IDEM's assessment methodology. The results are then compared to Indiana's WQS to make the assessment. IDEM's methods for applying ORSANCO's assessments, data, or both for the purposes of Integrated Reporting are described below and summarized in Table 8.

#### *IDEF's Assessment Units for the Ohio River*

The Ohio River is a series of 20 pools resulting from a series of high-lift locks and dams that bisect the river. These dams were installed for navigational purposes to maintain a minimum river depth and to regulate flow. These pools range from around six to almost 114 miles long, and each have their own unique characteristics that can affect water quality. The beginning and end points of each pool are defined in terms of their Ohio River Miles (ORM). There are five pools located along Indiana's border:

- Markland Pool (ORM 491.1 to ORM 531.6)
- McAlpine (ORM 531.6 to ORM 609.4)
- Cannelton (ORM 609.4 to ORM 722.9)
- Newburgh (ORM 722.9 to ORM 853.5)
- JT Myers (ORM 853.5 to ORM 855.3)

For its aquatic life use and fish consumption, ORSANCO applies the results of its assessment to the entire pool from which the data were collected, while its recreational use support assessments are reported in terms of river miles. ORSANCO's assessments of public water supply are provided for the entire river as a whole.

IDEF has divided the Indiana reaches of the Ohio River into individual assessment units within each pool for the purposes of assessment. IDEM's assessment units range from 1.8-13.7 miles long and allow IDEM to more accurately apply ORSANCO's recreational use assessments to specific reaches within each pool. For aquatic life use and fish consumption, IDEM applies ORSANCO's results for each pool to all the IDEM assessment units within the pool.

#### *Aquatic Life Use Assessments for the Ohio River*

ORSANCO monitors both the biological communities (fish and macroinvertebrates) and

chemical water quality at several sites along the Ohio River to determine the degree to which the Ohio River supports aquatic life.

Physical and chemical water quality data is collected bimonthly from about 15 fixed sites along the Ohio River, most of which are located at the navigational dams that divide the river into pools, five of which are either partly or wholly located along Indiana's border. Biological monitoring is conducted in 3-5 pools each year at 15 randomly chosen sites in each pool, resulting in an assessment data set for the entire river every six years.

ORSANCO uses two biological indices specifically designed for the Ohio River, both of which induce different metrics to measure the condition of biological communities in the river. For fish community assessments of the Ohio River, ORSANCO uses the modified Ohio River Fish Index (mORFin), which was developed based on the nationally-used Index of Biotic Integrity (IBI) designed to assess smaller streams. Both the mORFin and the Ohio River Macroinvertebrate Index (ORMin) have been customized to assess the Ohio River with expected values developed for the different habitats found in this large river system. These indices combine various attributes of the aquatic communities they measure to provide two scores for each pool in the river based on its biology. Individual mORFin and ORMin scores for each site are compared to expected scores to determine the biological condition rating for each type of community, which ranges from excellent to very poor. For the purposes of assessment, ORSANCO calculates an average mORFin and ORM scores for each pool based on the individual scores from all sites monitored within the pool.

ORSANCO determines chemical water quality conditions for each pool by comparing water sample results<sup>7</sup> for each site within the pool to the applicable criteria in Indiana's WQS or ORSANCO's PCS (Ohio River Valley Sanitation Commission, 2006), whichever are more stringent (CALM Attachment 1).

The results for biological and chemical water quality assessments are then evaluated together to determine use support in the manner described in Table 3.

IDEQ accepts ORSANCO's approach to evaluating both biological and water chemistry data. However, because Indiana's water quality criteria differ for some parameters from ORSANCO's criteria, assessments reported in ORSANCO's 305(b) report may differ somewhat from those in Indiana's Integrated Report depending on the parameter in question and whether ORSANCO's or Indiana's criterion is more stringent.

#### *Recreational Use Assessments for the Ohio River*

ORSANCO conducts at least five rounds of weekly sampling for bacteria at sites located upstream and downstream of six urban communities along the Ohio River. These are communities that have combined sewer overflows (CSOs), which can be significant sources of bacterial contamination to surface waters during rain events. Samples are analyzed for fecal coliform and *Escherichia coli* (*E. coli*). ORSANCO also monitors bacteria during the recreation season at five-mile intervals along the entire river. Sites are sampled weekly for a five-week period to allow for the calculation of a geometric mean for each site.

ORSANCO uses geometric mean *E. coli* results from all sites to determine recreational use support, comparing them to the *E. coli* criteria in ORSANCO's PCS. Indiana's *E. coli* criteria are slightly more stringent than ORSANCO's. However, Indiana's WQS allow the following two exceptions

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<sup>7</sup> Dissolved oxygen and temperature results are also evaluated for exceedance(s) of the applicable criteria. However, these results are not used to make impairment decisions because the data are not considered representative of conditions throughout each pool or over the entire assessment period.

to the criteria:

- (1) In cases where there are at least ten (10) samples at a given site, up to 10% of the results may exceed the single sample maximum criterion if the exceedances are incidental and attributable solely to the discharge of treated wastewater from a wastewater treatment and the geometric mean criterion is met<sup>8</sup>.
- (2) For waters with a combined sewer overflow (CSO) limited use designation, the recreational criteria are suspended for up to four (4) days following the end of an overflow discharge<sup>9</sup>.

Unlike Indiana's WQS, ORSANCO's criteria do not allow exceptions for *E. coli* exceedances. This, combined with the fact that ORSANCO also directly applies its single sample maximum criterion to individual results, makes ORSANCO's recreational use assessments more stringent than Indiana's by virtue of its assessment methodology. Indiana therefore accepts ORSANCO's assessments of recreational use support for the Ohio River.

#### *Public Water Supply Use Support Assessments for the Ohio River*

To determine whether the Ohio River is meeting its use as a public water supply (PWS), ORSANCO combines the results from its bacteria monitoring and bimonthly chemical monitoring programs with information from surveys of drinking water treatment facilities and U.S. EPA's Safe Drinking Water Information System (SDWIS) database.

Each assessment cycle, ORSANCO mails surveys to all Ohio River water utilities requesting information about the quality of the source water they draw from the Ohio River. For Indiana, three facilities are contacted (Mt. Vernon, Evansville, and New Albany). The surveys ask utilities if there were any intake closures during the assessment period due to spills, whether violations of finished drinking water maximum contaminant levels (MCLs) occurred due to source water quality, or whether "non-routine" or extraordinary treatment due to source water quality was necessary to meet finished water MCLs.

ORSANCO also queries SDWIS for records of MCL violations within the assessment period for all Ohio River water utilities. For Indiana, this includes three facilities (Mt. Vernon, Evansville, and New Albany).

This information is evaluated as shown in Table 8 to determine whether the Ohio River as a whole is meeting its use as a public water supply.

#### *Fish Consumption Assessments for the Ohio River*

In addition to its designated use support assessments for aquatic life, recreation, and public water supply, ORSANCO also conducts assessments to determine the degree to which the Ohio River supports fish consumption. In applying these assessments to Indiana reaches of the Ohio River, IDEM emphasizes that this information is not intended to be a public health advisory. IDEM recommends that the public refer either to the most current Indiana Fish Consumption Advisory (FCA), contact the Indiana State Department of Health (ISDH), or consult both, with any specific questions or concerns regarding the health risks associated with consuming fish caught from the Ohio River. Important

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<sup>8</sup> Relevant sections of the Indiana's water quality standards include 327 IAC 2-1.5-8(e)(3)(b) for waters within the Great Lakes basin and 327 IAC 2-1-6(d)(3), which applies to downstate waters.

<sup>9</sup> Relevant sections of the Indiana's water quality standards include 327 IAC 2-1.5-5 (c) for waters within the Great Lakes basin and 327 IAC 2-1-3(a)(5)(c), which applies to downstate waters. Both of these sections point to IAC 327 2-1-3.1 which describes the process for assigning a CSO limited use designation and how Indiana's recreational use criteria are to be applied to waters with this designation.

differences between fish consumption use impairments identified as a result of these assessments, and the health advisories provided in the FCA are discussed in more detail in the section describing Indiana's assessment methodology for fish consumption for other Indiana waters and Lake Michigan.

ORSANCO uses both fish tissue data and water sample results to make its fish consumption use assessments, and its methods for evaluating the data differ somewhat from IDEM's methods for similar assessments on other Indiana waters. Unlike ORSANCO's methodology, IDEM's assessment methodology relies on fish tissue data only and requires only one exceedance of the applicable criterion to assess impairment. IDEM's methods are intended to result in a more conservative estimate of conditions in smaller rivers and streams for which there are commonly less available data.

In contrast, the Ohio River is a large and complex river system. The data provided for the assessment of fish consumption use support by ORSANCO monitoring programs result in a far more robust data set than those available for similar assessments of other Indiana waters. IDEM's collaboration with ORSANCO allows IDEM to focus its monitoring resources on other waters. As a result, IDEM's monitoring on the Ohio River is comparatively quite limited.

For most of the Ohio River, IDEM accepts ORSANCO's assessment methodology for fish consumption use support. Results for methylmercury and PCBs in fish tissue are reviewed independently of ORSANCO results using the same methods applied to other waters in the state for those reaches where IDEM has sampled for fish tissue. Where IDEM's assessment for a given reach differs from ORSANCO's assessment, IDEM accepts ORSANCO's assessment because the latter is typically based upon a more recent and robust data set.

In 2012, ORSANCO's technical committee approved the use of the U.S. EPA guidance issued in 2010 for implementing the national methylmercury water quality criterion in CWA programs, and began using this methodology for its 2014 cycle assessments. The criteria ORSANCO applies in its fish consumption assessments are shown in Table 4. ORSANCO's criterion for methylmercury in fish tissue is equivalent to that used by IDEM in its fish consumption assessments on other waters.

In addition to fish tissue data, ORSANCO's monitoring programs provide results for PCBs, dioxin, and total mercury in the water column. For PCBs and dioxin, ORSANCO's criteria are more stringent than those expressed in Indiana's WQS.

ORSANCO does not currently monitor for PCBs in fish tissue. If such data becomes available in the future, IDEM will apply its 0.02 ug/L fish tissue criterion for PCBs using ORSANCO's 10% rule as shown in Table 4.

Table 3: Water quality assessment criteria for determining designated use support for the Ohio River.

<b>Aquatic Life Use Support – Ohio River</b>		
<p>ORSANCO combines the results from both its biological and chemical water quality monitoring programs to determine aquatic life use support for the Ohio River. To determine biological integrity of a given pool, average scores for the Ohio River modified Fish Index (mORFin) and Ohio River Macroinvertebrate Index (ORMin) are calculated for each pool from the individual scores for all sites monitored within the pool and compared to expected scores to determine a biological rating for the pool. Chemical water quality conditions are determined for each pool by comparing water sample results<sup>10</sup> for each site within the pool to the applicable criteria in Indiana's WQS or ORSANCO's Pollution Control Standards (PCS) (Ohio River Valley Sanitation Commission, 2006), whichever are more stringent. The results for biological and chemical water quality assessments are evaluated together to determine use support in the manner described below.</p>		
	<b>Fully Supporting</b>	<b>Not Supporting</b>
Pollutants (conventional inorganics and toxicants) and biological communities (fish and macroinvertebrates)	<p>Assessments of chemical water quality are based on results for conventional inorganics (pH, sulfate, and chloride) and toxicants (dissolved metals, total mercury, total selenium, free cyanide, and ammonia). Results are evaluated on a site-by-site basis. Exceedances are determined by comparing results for each site to the applicable criteria in Indiana's WQS or ORSANCO's PCS, whichever are more stringent.</p> <p>Not more than 10% of all water samples exceed applicable criterion for a given pollutant</p> <p>And</p> <p>Average mORFin and ORMin scores for the pool greater than or equal to 20, which indicates a biological rating of "Fair" to "Excellent"</p>	<p>More than 10% of all water samples exceed applicable criterion for a given pollutant</p> <p>And</p> <p>One or both average mORFin and ORMin scores for the pool falls within 10-19.9, which indicates a biological rating of "Poor"</p> <p>Or</p> <p>One or both average mORFin or ORMin scores for the pool less than 10, which indicates a biological rating of "Very Poor"</p>

<sup>10</sup> Dissolved oxygen and temperature results are also evaluated for exceedance(s) of the applicable criteria. However, these results are not used to make impairment decisions because the data are not considered representative of conditions throughout each pool or over the entire assessment period.

### Public Water Supply – Ohio River

ORSANCO combines the results from its bacteria and chemical water quality monitoring programs with results from surveys of drinking water facilities and information from U.S. EPA's Safe Drinking Water Act Information System (SDWIS) to determine public water supply use support for the Ohio River.

<h3 style="margin: 0;">Public Water Supply – Ohio River</h3>		
<p>Chemical pollutants, bacteria, and information from surveys of drinking water facilities and SDWIS</p>	<p>Assessments of chemical water quality are based on results for bacteria (fecal coliform), conventional inorganics (fluoride, total nitrogen and nitrite, and sulfate) and other substances regulated under the SDWA with either a maximum concentration limit (MCL) or secondary MCL. These include total metals, total cyanide, and phenols. Results for bacteria and chemical pollutants are evaluated on a site-by-site basis. Exceedances are determined by comparing results for each site to the applicable criteria in Indiana's WQS or ORSANCO's PCS, whichever are more stringent.</p>	
	<b>Fully Supporting</b>	<b>Not Supporting</b>
	<p>Not more than 10% of water sample results exceed the applicable water quality criterion</p> <p style="text-align: center;">And</p> <p>No finished water MCL violations caused by Ohio River water quality were reported</p>	<p>More than 25% of water sample results exceed the applicable criterion</p> <p style="text-align: center;">Or</p> <p>More than 10% of water sample results exceed the applicable water quality and a corresponding finished water MCL violation caused by Ohio River water quality was reported</p> <p style="text-align: center;">Or</p> <p>Frequent closures due to elevated levels of pollutants were necessary to protect water supplies and meet MCLs</p> <p style="text-align: center;">Or</p> <p>Frequent “non-routine” additional treatment was necessary to protect water supplies and to meet MCLs</p>
<p>Pollutants</p>	<p>Actual concentration values for all samples are less than or equal to 0.02 mg/kg wet weight</p>	<p>Actual concentration values for one or more samples are greater than 0.02 mg/kg wet weight</p>
<p>Mercury in Fish Tissue and Water Samples</p>	<p>Trophic level weighted arithmetic mean concentration values for all sampling events are less than or equal to 0.3 mg/kg wet weight</p>	<p>Trophic level weighted arithmetic mean concentration values for one or more sampling events are greater than 0.3 mg/kg wet weight</p>

### Fish Consumption Use Support (Human Health) – Ohio River

ORSANCO monitoring results for total mercury, PCBs, and dioxin in water samples were evaluated for the exceedance(s) of the applicable criteria in Indiana's WQS or ORSANCO's PCS, whichever is more stringent, and the number of times the exceedance(s) occurred. ORSANCO results for methylmercury in fish tissue samples were evaluated for the exceedance(s) of the applicable criteria in Indiana's WQS or ORSANCO's PCS, whichever is more stringent, and the number of times the exceedance(s) occurred. For sites where ORSANCO's water sample results conflict with its fish tissue results for the same pollutant, the fish tissue results are given more weight in the assessment decision. ORSANCO does not monitor for PCBs in fish tissue. IDEM results for methylmercury and PCBs in fish tissue are reviewed independently of ORSANCO results using the same methods applied to other waters in the state. Where IDEM's assessment for a given reach differs from ORSANCO's assessment, IDEM accepts ORSANCO's assessment.

	<b>Fully Supporting</b>	<b>Not Supporting</b>
Polychlorinated biphenyls (PCBs) and Dioxin in Water Samples	Not more than 10% of water sample results exceed the applicable water quality criterion	More than 10% of water sample results exceed the applicable water quality criterion
Polychlorinated biphenyls (PCBs) in Fish Tissue Samples	Actual concentration values for all samples are less than or equal to 0.02 mg/kg wet weight	Actual concentration values for one or more samples are greater than 0.02 mg/kg wet weight
Mercury in Fish Tissue and Water Samples	Trophic level weighted arithmetic mean concentration values for all sampling events are less than or equal to 0.3 mg/kg wet weight	Trophic level weighted arithmetic mean concentration values for one or more sampling events are greater than 0.3 mg/kg wet weight

### Recreational Use Support (Human Health) – Ohio River

Available data are evaluated in two ways. Both individual results and monthly geometric mean results calculated from five samples, one sample collected each week for five consecutive weeks, are evaluated for exceedances of the applicable criteria in ORSANCO's PCS and the number of times exceedances occurred.

	<b>Fully Supporting</b>	<b>Not Supporting</b>
Bacteria ( <i>E. coli</i> )	<p>Not more than 10% of the monthly geometric mean results exceed the geometric mean criterion of 130 cfu/100mL</p> <p style="text-align: center;">And</p> <p>Not more than 10% of all single sample results exceed the instantaneous maximum criterion of 240 cfu/100 mL</p>	<p>More than 10% of the monthly geometric mean results exceed the geometric mean criterion of 130 cfu/100mL</p> <p style="text-align: center;">Or</p> <p>More than 10% of all single sample results exceed the instantaneous maximum criterion of 240 cfu/100 mL</p>

With regard to mercury in the water column, ORSANCO's chronic aquatic life use criterion for total mercury in ambient waters is equivalent to the criterion used by Indiana downstate (outside of the Great Lakes basin). ORSANCO applies this criterion in its assessments of fish consumption use support as opposed to aquatic life use support because it considers bioaccumulation of mercury in fish tissue more of a human health concern than a threat to aquatic life. IDEM concurs with ORSANCO's use of water column results for mercury in assessments of fish consumption use based on this rationale and accepts ORSANCO's fish consumption use assessments for the Ohio River. Unlike ORSANCO, IDEM also applies the chronic criterion for total mercury in its assessments of aquatic life use support on the Ohio River. Based on Indiana's decision to use ORSANCO's total mercury results for aquatic life use assessments, Indiana's record of aquatic life use impairments may differ from those reported by ORSANCO in its biennial CWA 305(b) report.

For fish consumption assessments at sites where the results for total mercury or PCBs, or both, in water conflict with the fish tissue results for that same contaminant, the fish tissue results are given more weight in the assessment decision. This is because fish tissue levels of these contaminants are an indicator of more direct potential mercury exposure to individuals consuming fish from the Ohio River, whereas their concentrations in the water column are more an indicator of potential bioaccumulation than direct impacts from consumption. IDEM concurs with this approach.

Table 4: Assessment criteria used by ORSANCO and IDEM to determine fish consumption use support for the Ohio River.

Mercury (Hg)		
Fully Supporting		Not Supporting
Concentration in Fish Tissue	Less than or equal to 0.3 (mg/kg wet weight)	Greater than 0.3 (mg/kg wet weight)
Concentration in Water	Less than or equal to 0.012 ug/L	Greater than 0.012 ug/L
Polychlorinated Biphenyls (PCBs)		
Fully Supporting		Not Supporting
Concentration in Fish Tissue	Less or equal to 0.02 (mg/kg wet weight)	Greater than 0.02 (mg/kg wet weight)
Concentration in Water	Less than or equal to 0.000064 ug/L	Greater than 0.000064 ug/L
Dioxin		
Fully Supporting		Not Supporting
Concentration in Water	Greater than 0.00000005 ug/L	Greater than 0.00000005 ug/L

## LAKES ASSESSMENTS

IDEQ conducts two types of assessments on Indiana Lakes and Reservoirs. CWA Section 314 requires states to report on the trophic status and trends of all publicly owned lakes in Indiana, and CWA Section 305(b) requires states to report on the degree to which Indiana's lakes and reservoirs are supporting their designated uses. Most of the data used in these assessments comes from the Indiana Clean Lakes Program (CLP).

The CLP samples approximately 80 lakes each year in July and August, which is the time of year when worst-case scenarios and stable conditions (warm temperatures, thermal stratification, hypolimnetic anoxia, and algal blooms) are expected.

Prior to 2010, lakes were selected for sampling based on logistical considerations to minimize travel costs. With 401 public lakes in the state, this strategy ensured that most lakes would be monitored once every five years. While these results can be applied to individual lakes, they were regionally restricted and could not be used to make statistical inferences about the trophic conditions of lakes on a statewide basis.

In 2010 and in consultation with IDEM, the CLP began using a randomized approach to select lakes for sampling in order to support a statewide assessment of trophic condition of Indiana lakes. Now, at the beginning of each sampling season, the CLP randomizes its list of public lakes and selects the first 80 on the resulting list to be monitored that season. Each season, the list is re-randomized. Using this approach, it is no longer a given that all 401 of Indiana's public lakes will be monitored in five years. However, the data collected now provides statistically significant results that can be applied to the entire state. These results are published every two years in the CLP's *Indiana Lake Water Quality Assessment Report*, which is available online at: <http://www.indiana.edu/~clp/PUBreports.php>.

The CLP also made changes to its sampling and analytical methods for phytoplankton, which in turn required changes in the methods IDEM uses to determine the trophic status of individual lakes and reservoirs. These changes, which are discussed in more detail in the following section, impact both IDEM's CWA Section 314 assessments and to a lesser degree, its CWA Section 305(b) assessments.

## IDEM'S CWA SECTION 314 LAKES ASSESSMENTS

Prior to 2010, IDEM used the Indiana State Trophic Index (ISTI) to determine the trophic status and trends in individual lakes throughout Indiana using data collected for the most part by the CLP. In

2010, the CLP made the following changes in its sampling and analytical methods for phytoplankton samples:

- Sample Collection – The CLP switched from using a 63-micron vertical tow net, which captures plankton in the water column greater than 63-microns in size to an integrated sampler, which captures all the plankton in the water column resulting in a more representative sample.
- Sample Analysis – The CLP changed its methods for counting plankton from natural units per liter (NU/L) to the number of cells per milliliter (cells/mL). NU/L represents a single organism, which may be a single-celled or multi-celled colonial form. Cell density measured as cells/mL is now preferred among phycologists and limnologists today because it represents the total number of phytoplankton cells including those aggregated in multi-celled colonies.

These changes eliminated some of the indicators required to calculate the ISTI. After the first season in which they were implemented, the CLP performed an analysis to determine whether plankton results expressed in cells/mL could be converted to NU/L for the purposes of calculating the ISTI. The CLP found no clear statistical relationship between the results produced by the two methods that would allow such conversion. Given this, future ISTI scores calculated with plankton data collected and analyzed with the new protocols would generate substantially different results not comparable with previous data. Comparability over time is necessary because IDEM also uses trophic scores to determine lake trends for the purposes of CWA Section 314. In order to ensure comparability, IDEM decided to abandon the use of the ISTI in favor of Carlson's Trophic State Index (TSI) to determine the trophic condition of Indiana lakes and reservoirs.

IDE� now uses Carlson's TSI exclusively in its CWA Section 314 assessment to determine trophic status and trends for individual lakes. IDE�'s CWA Section 305(b) assessment methods for lakes, which are discussed in a later section of this methodology, also rely in part on the Carlson's TSI scores. IDE�'s addendum to its 2016 Integrated Report provides the most recent Carlson TSI scores for all lakes for which sufficient data exists to calculate them.

#### *Trophic State Assessments*

As noted in the previous section, IDE� now uses the Carlson Trophic State Index to calculate TSI scores for Indiana lakes. The Carlson TSI score is a measure of algal biomass that can be calculated for three variables, all of which can be used as independent indicators of the amount of algal biomass present in the waterbody – the trophic state of the lake or reservoir in question.

The three indicators used are Secchi depth (SD), total phosphorus (TP), and Chlorophyll-*a* (CHL). The TSI is a scale of 0-100 based on the interrelationships of these three variables using data from northern temperate lakes in North America. The equations used to calculate the Carlson TSI are:

$$TSI (SD) = 60 - 14.41 \ln(SD) \quad \text{Equation 1}$$

$$TSI (CHL) = 9.81 \ln(CHL) + 30.6 \quad \text{Equation 2}$$

$$TSI (TP) = 14.42 \ln(TP) + 4.15 \quad \text{Equation 3}$$

Theoretically, each TSI score should independently tell the same “story” about the trophic state of a given lake. However, often they do not. This is because not all the assumptions used in the development of the Carlson Index hold true for Indiana lakes.

The index assumes that suspended particulate matter in the water controls transparency (Secchi depth) and that algal biomass is a major source of particulates. However, many Indiana lakes are

affected by non-algal turbidity, which can heavily influence transparency. The index also assumes that total phosphorus is the major limiting factor in algal growth and that all forms of phosphorus are present and playing a role in the production of algal biomass. Like those associated with Secchi depth, these assumptions may not hold true for lakes impacted by domestic sewage, which can contribute higher amounts of orthophosphate or in lakes naturally enriched with organic material where humic acids can bind with the phosphorus reducing its concentration in the water column.

Unlike total phosphorus, which may or may not be the primary limiting factor in algal production, CHL concentration provides a more direct measure of phytoplankton abundance. Chlorophyll-*a* concentration is also not affected by non-algal turbidity like Secchi depth can be. Therefore, IDEM uses the TSI for CHL for trophic state classification for the purposes of its CWA 314 assessments using the classification systems shown in Table 5. However, because divergent results for a given lake allow for comparisons that can yield additional insights into how different components of a lake's ecosystem might be functioning, all three trophic scores are reported for each lake where possible.

Table 5: Trophic states and predicted characteristics based on Carlson TSI scores for chlorophyll-*a* (CHL).

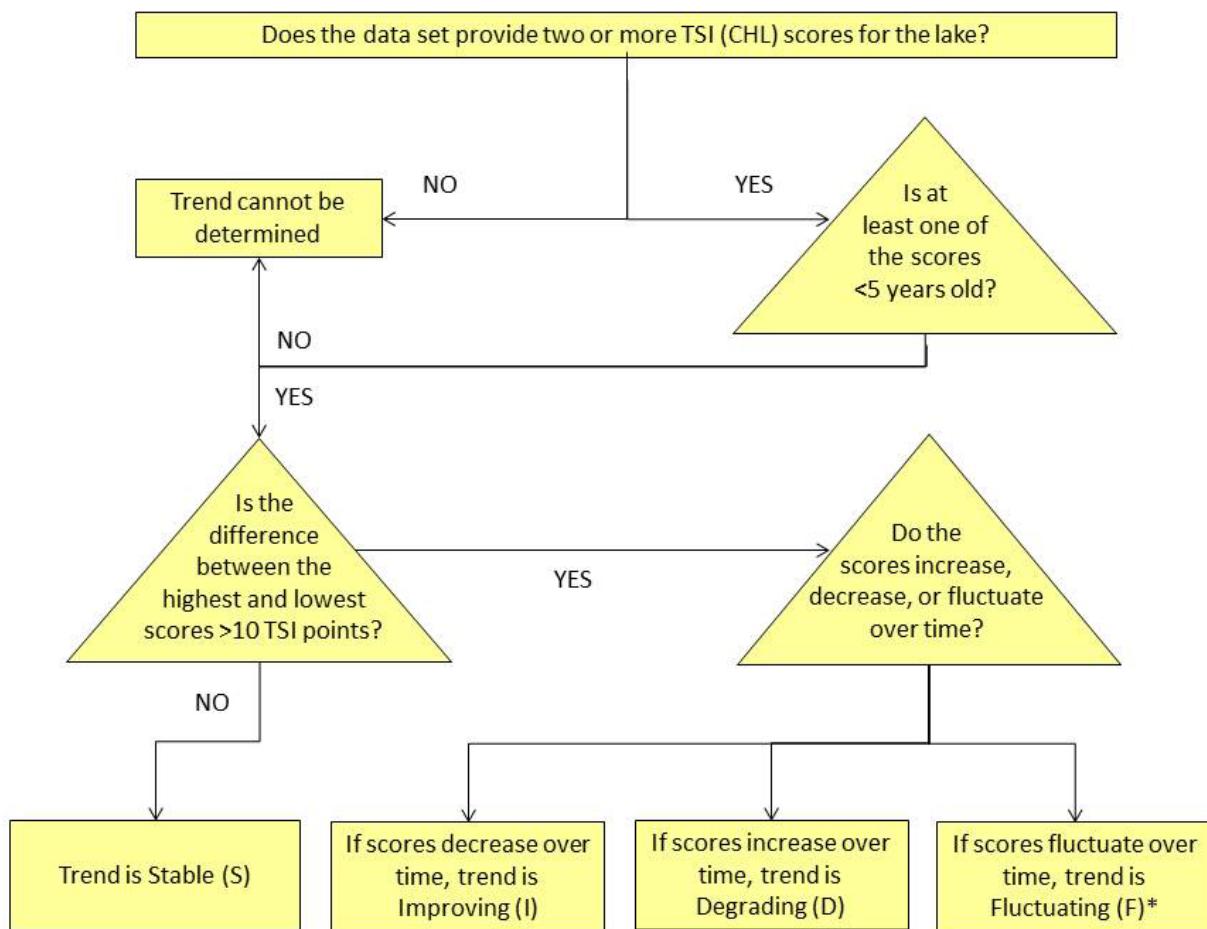
Trophic State	TSI (CHL)	Corresponding CHL values (ug/L)	Characteristics of Trophic State
Oligotrophic	Less than 40	Less than 0.95 – 2.6	<p>Low biological productivity</p> <ul style="list-style-type: none"> <li>• High transparency (clear water)</li> <li>• Low levels of nutrients</li> <li>• Low algal production and little/no aquatic vegetation</li> <li>• Well oxygenated hypolimnion year round; hypolimnion of shallower lakes may become anoxic at TSI scores greater than 30</li> </ul>
Mesotrophic	40-50*	2.6-7.3	<p>Moderate biological productivity</p> <ul style="list-style-type: none"> <li>• Moderately transparency (moderately clear water)</li> <li>• Moderate levels of nutrients</li> <li>• Beds of submerged aquatic plants</li> <li>• Increasing possibility of anoxia in the hypolimnion during summer</li> </ul>
Eutrophic	50-70	7.3-56	<p>High biological productivity</p> <ul style="list-style-type: none"> <li>• Water has a low transparency</li> <li>• High levels of nutrients</li> <li>• Large amounts of aquatic plants or algae</li> <li>• At TSI scores greater than 60, blue-green algae dominate and algal scums and excessive macrophytes possible</li> <li>• Hypolimnion commonly anoxic; fish kills possible</li> </ul>
Hypereutrophic	Greater than 70	56-155	<p>Very high biological productivity</p> <ul style="list-style-type: none"> <li>• Very low transparency, usually less than 3 feet</li> <li>• Very high levels of nutrients</li> <li>• Dense algae and aquatic vegetation; algal scums and few aquatic plants at TSI scores greater than 80</li> <li>• Fish kills and/or dead zones below the surface are common</li> <li>• Hypolimnion persistently anoxic; Fish kills and/or "dead zones" below the surface common</li> </ul>

\*Lakes with a TSI score of 50, which is on the boundary between mesotrophic and eutrophic conditions are evaluated with their corresponding TSI scores for TP and SD along with any other available information disk and classified in accordance to the best professional judgment of IDEM scientists.

#### *Trend Assessments of Indiana Lakes*

IDE� assesses trends in the trophic condition of Indiana lakes based on the trophic scores collected over time. Prior to 2010, IDEM used ISTI scores for this purpose. IDEM now uses Carlson TSI scores for CHL for this purpose.

IDEML's method for assessing trends for the purposes of CWA Section 314 is not statistical in nature. Rather, it was developed through the best professional judgement of IDEML scientists and based on very small data sets with results separated in many cases by more than a decade. The method requires two or more Carlson TSI scores for CHL from sampling conducted from 1990 to present day with at least one score having been determined from data collected in the most recent five years (Figure 2). Each lake with sufficient data may be assessed as stable, improving, degrading or fluctuating, which is intended to provide insight to how natural conditions and human activities may be impacting the lake.



\*A fluctuating trend can only be assessed for lakes with three or more TSI scores.

Figure 2: IDEML's method for assessing trends in the trophic condition of Indiana lakes.

### IDEML'S CWA SECTION 305(B) LAKES ASSESSMENTS

#### *Aquatic Life Use*

IDEML's methods for aquatic life use remain unchanged for the 2016 cycle. All assessments to date of Indiana lakes and reservoirs for support of aquatic life are based primarily on information, where available, from the Indiana Department of Natural Resources (IDNR), including surveys of the status of sport fish communities in lakes and annual trout stocking plans. Lakes reported to be missing their native Cisco population or which are unable to support stocked trout are considered impaired. Lakes in which thermal modifications have been shown to have an adverse effect on aquatic life and those that do not meet Indiana's WQS for pH have also been assessed as not supporting of aquatic life use.

## Public Water Supply

All assessments of use support for public water supply to date are based on the methods shown in Table 6.

Table 6: Methods used to assess source waters for public water supply.

Public Water Supply Use Support – Lakes and Reservoirs		
	Fully Supporting	Not Supporting
Taste and odor-producing substances	Taste and odor substances not present in quantities sufficient to interfere with production of drinking water by conventional treatment	Taste and odor substances present in quantities requiring additional treatment by the public water supply to prevent taste and odor problems
Information on the application of pesticides to surface drinking water reservoirs	Reservoirs or lakes that serve as source water for public water supplies that received pesticide (algaecide) application permits for algae were classified as not supporting because additional treatment by the public water supply was required to prevent taste and odor problems.	

## Recreational Use

IDEML conducts two types of assessments to determine the extent to which Indiana lakes and reservoirs support recreational uses. Where there are available bacteria data, IDEML assesses recreational use support within the context of human health in the same manner as it does with streams (Table 7).

Table 7: Methods used to assess Indiana waters for recreational use support within the context of human health.

Recreational Use Support (Human Health) – All Waters		
	Fully Supporting	Not Supporting
IDEML has two different methods for determining recreational use support, depending on the type of data set being used in making the assessment. For data sets consisting of five equally-spaced samples over a 30-day period, IDEML applies two tests, both of which are based on the U.S. EPA's Ambient Water Quality Criteria for Bacteria - 1986 (U.S. EPA, 1986), which provides the foundation for Indiana's WQS for recreational use. For data sets with 10 or more grab samples but without the five samples equally-spaced over the 30 days required to calculate a geometric mean, the 10% rule is applied. When both types of data sets are available, the assessment decision is based on the data set consisting of five samples, equally-spaced over a 30-day period.		
Bacteria ( <i>E. coli</i> ): at least five equally-spaced samples over 30 days. (cfu = colony forming units)	Geometric mean does not exceed 125 cfu/100mL	Geometric mean exceeds 125 cfu/100mL.
Bacteria ( <i>E. coli</i> ): grab samples (cfu = colony forming units)	<p>Not more than 10% of measurements are greater than 576 cfu/100ml (for waters infrequently used for full body contact) or 235 cfu/100mL (for bathing beaches)<sup>11</sup>. And Not more than one sample is greater than 2,400 cfu/100mL.</p>	<p>More than 10% of samples are greater than 576 cfu/100mL or more than one sample is greater than 2,400 cfu/100mL.</p>

In 2008, IDEML developed additional assessment criteria and methods for determining the degree to which nutrient enrichment may be impacting the aesthetic value of Indiana lakes and their use for recreational activities.

On a national scale, the number one impairment of lakes and reservoirs has long been identified as nutrients. Prior to 2008, IDEML's lakes assessments were largely limited to CWA Section 314

<sup>11</sup> The value of 576 cfu/100mL comes from U.S. EPA's Ambient Water Quality Criteria for Bacteria - 1986 (U.S. EPA, 1986) and represents the single sample maximum applicable to waters infrequently used for full body recreation. For data collected from bathing beaches, the single day maximum value of 235 cfu/100mL is applied.

assessments of lake trends and trophic state, due in part to the absence of numeric water quality criteria for nutrients in the state's WQS. Indiana's WQS do contain narrative criteria applicable to all waters of the state. However, developing an assessment methodology that translates narrative criteria in a scientifically defensible way remains a challenge for states. The benchmarks used to determine recreational use support within the context of aesthetics are based on the results of a study conducted by Limno-Tech, Inc. (LTI) (Table 8).

Table 8: Recommended phosphorus thresholds and their corresponding expected ranges of chlorophyll-*a* concentrations.

Lake Type	TP (ug/L)	Associated Range in CHL (ug/L)
Natural Lakes	54	4 to 20
Reservoirs	51	2 to 25

Source: Modified from LTI (2007).

The associated range of chlorophyll-*a* (CHL) represents the range of concentrations expected when total phosphorus (TP) concentrations are at or below 54 ug/L for natural lakes or 51 ug/L for reservoirs, respectively. In some cases, the CHL results are not consistent with the expectations shown in Table 8 based on the TP levels measured for a given lake (for example, low CHL values associated with high TP values or vice versa). For these situations, IDEM's methodology uses the trophic state index (TSI) score as a surrogate response variable (in addition to CHL) to determine impairment status.

While the TSI does not provide a direct response variable for TP, it can be a useful indicator in cases where CHL results are mixed. In addition to providing a surrogate measure for CHL, the TSI score also provides a good measure of the overall trophic condition of a given lake. Recognizing the connection between trophic status and nutrient enrichment, the U.S. EPA generally considers hypereutrophic conditions as measured by the TSI indicative of impairment (U.S. EPA, 2000c).

IDE� does not believe that the TSI score alone is sufficient information for making designated use assessments, because it can be affected by a number of variables in addition to nutrient loading, such as levels of non-algal turbidity or factors that may be limiting algal growth. However, in cases where the CHL and TP results are mixed, IDEM uses the most recent TSI score to determine impairment. If the TSI score indicates eutrophic or hypereutrophic conditions, the lake is assessed as impaired. TSI scores are not used in the absence of CHL results, and are only reviewed in cases where there are sufficient TP and CHL data, but those data showed conflicting results.

These threshold values are applied as benchmarks for the purposes of determining recreational use support of Indiana's natural lakes and reservoirs, within the context of aesthetics in the following manner:

*Step 1. Determine the available data to be used for assessment*

Indiana's Clean Lake Program (CLP) samples between 70 and 80 lakes each year selected from a randomized list of all public lakes and reservoirs in the state that have a usable boat ramp and are larger than five acres. Lakes are monitored from July through August, which is the time of year when worst-case scenarios and stable conditions (warm temperatures, thermal stratification, hypolimnetic anoxia, and algal blooms) are expected.

All available data for a given lake were used for assessment purposes. U.S. EPA guidance suggests that, while all readily available data should be reviewed, 305(b) assessment decisions should be based on data five years old or less. The use of historical data is necessary because the sampling conducted by IDEM's CLP program is designed specifically to support CWA Section 314 assessments of trophic state and lake trends, not to make designated use assessments. As a result, while Indiana's CLP sampling strategy ensures sufficient samples for determining trophic state and trends, it does not guarantee sufficient data for making designated use assessments (see Table 6 for minimum data

requirements). To date, most CWA 305(b) assessments rely on the following CLP data sets:

- One-time samples collected from public access lakes by students at Indiana University's School of Public and Environmental Affairs and analyzed in the CLP's laboratory.
- Monthly TP and CHL samples collected from public and private lakes by trained volunteers and sent to the CLP's laboratory for analysis.

*Step 2. Determine adequate data for assessment*

For purposes of determining recreational use support within the context of aesthetics, the following general rules were applied:

- Only TP and CHL data, including volunteer-collected data, analyzed in the CLP's laboratory in accordance with the CLP QAPP were used for assessment purposes.
- A minimum of three years' worth of data was considered sufficient for assessment purposes as long as each TP value had a corresponding CHL value.
- Multiple results within a given year for TP and CHL were averaged to provide a single value for each parameter for that year.
- For consistency in assessments, all samples used in attainment decisions must have been collected during the summer season.

*Step 3: Apply benchmark criteria to determine use support*

The thresholds shown in Table 8 were applied to all natural lakes and reservoirs for which sufficient data were available. IDEM's methods for applying these criteria are summarized in Table 9 and are illustrated in Figure 3. All waters found to be not supporting of recreational use (aesthetics) were categorized as impaired and placed in Category 5A of Indiana's 303(d) List of Impaired Waters.

Table 9: Summary of IDEM's assessment methodology for recreational use support within the context of aesthetics.

Recreational Use Support (Aesthetics) – Lakes and Reservoirs		
	Fully Supporting	Not Supporting
Natural Lakes	<p>No more than 10% of all TP values greater than 54 ug/L and their associated Chlorophyll a values are greater than 20 ug/L</p>	<p>10% or fewer of all TP values are greater than 54 ug/L, but their associated Chlorophyll a values are greater than 20 ug/L, and the CHL (TSI) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 54 ug/L with associated Chlorophyll a values greater than 4ug/L, but the CHL (TSI) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 54 ug/L with associated Chlorophyll a values greater than 4ug/L</p>
Reservoirs	<p>No more than 10% of all TP values greater than 51 ug/L and their associated Chlorophyll a values are greater than 25ug/L</p>	<p>10% or fewer of all TP values are greater than 51 ug/L, but their associated Chlorophyll a values are greater than 25 ug/L, and the CHL (TSI) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 51 ug/L with associated Chlorophyll a values greater than 2ug/L, but the CHL (TSI) score for the lake indicates eutrophic (50-70) or hypereutrophic (greater than 70) conditions</p> <p>Or</p> <p>More than 10% of all TP values are greater than 51 ug/L with associated Chlorophyll a values greater than 2ug/L</p>

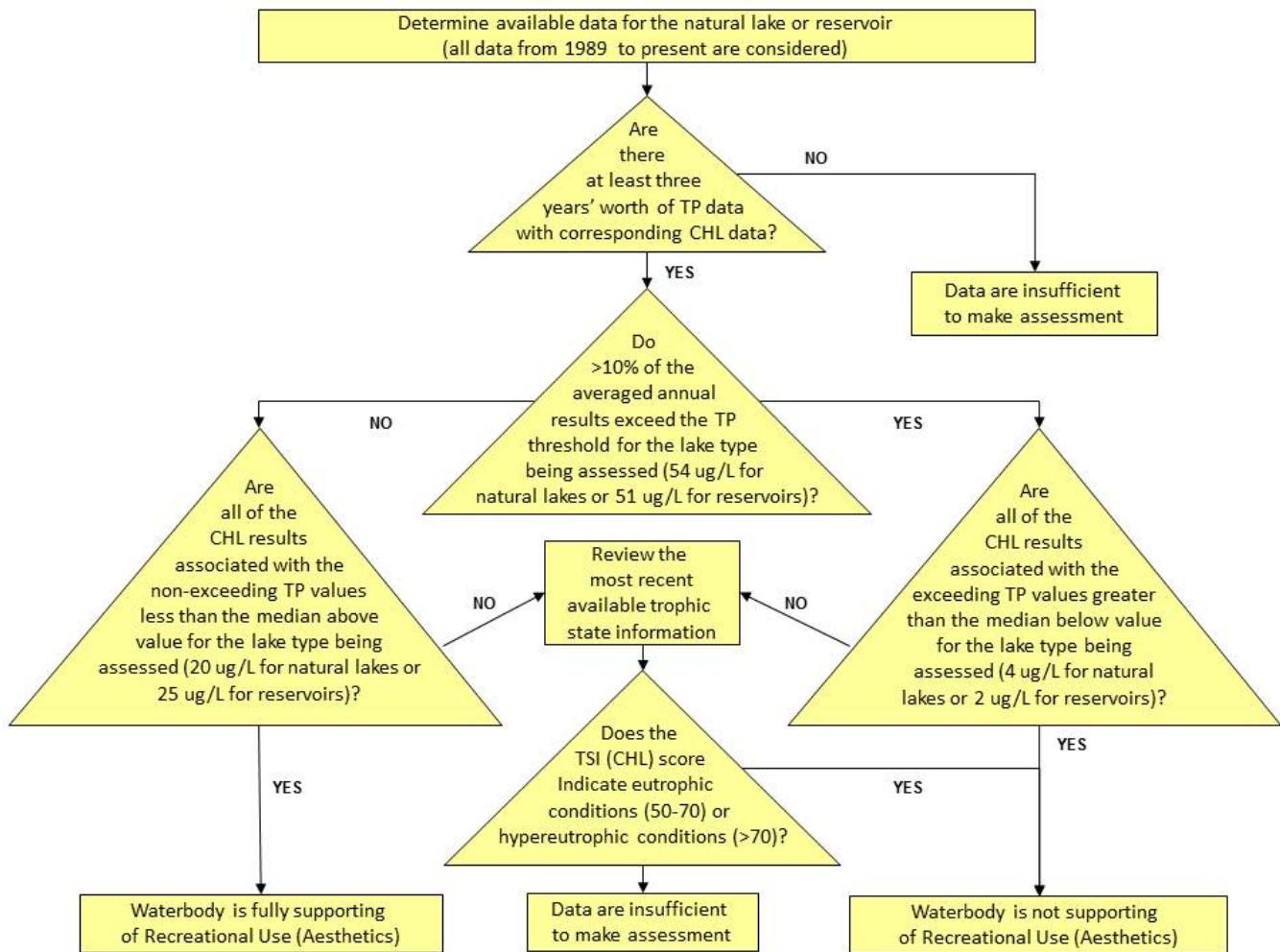


Figure 3: IDEM's assessment process for determining recreational use support for lakes within the context of aesthetics (CHL = Chlorophyll *a*; TSI = Trophic State Index).

Given the robust, Indiana-specific dataset upon which the thresholds recommended in the Limno-Tech, Inc. (LTI) study were developed, IDEM believes them to be appropriate for making designated use assessments.

#### INDIANA'S ASSESSMENT METHODOLOGY FOR FISH CONSUMPTION FOR WATERS OTHER THAN THE OHIO RIVER

The U.S. EPA "generally believes that fish and shellfish consumption advisories...based on reach specific information demonstrate impairment of CWA section 101(s) 'fishable' uses" and continues to require that IDEM make water quality assessments for fish consumption and place waters with fish consumption advisories on its 303(d) list of impaired waters (U.S. EPA, 2000a). However, Indiana's WQS do not contain numeric criteria for the concentration of mercury or polychlorinated biphenyls (PCBs) in fish tissue. IDEM's past and present fish consumption use assessments are a translation of the narrative portion of Indiana's WQS, which states that surface waters "...shall be free from substances in concentrations that on the basis of available scientific data are believed to be sufficient to injure, be chronically toxic to, or be carcinogenic, mutagenic, or teratogenic to humans, animals, aquatic life, or plants." (327 IAC 2-1-6 (a)(2) and 327 IAC 2-1.5-8(b)(2)).

## IDEML'S ASSESSMENT CRITERIA FOR MERCURY AND PCB CONCENTRATIONS IN FISH TISSUE

### *Mercury*

In 2001, the U.S. EPA issued a revised human health-based water quality criterion for methylmercury (U.S. EPA 2001). This criterion is unique among all U.S. EPA (Clean Water Act 304(a)) water quality criteria in that it identifies an acceptable mercury concentration in fish tissue rather than water. A fish tissue criterion is logical because fish are the main source of methylmercury exposure to both humans and wildlife. Also, a tissue-based criterion eliminates the need for a bioaccumulation factor in the criterion calculation, which can be a significant source of uncertainty. The derivation of the methylmercury water quality criterion is based on the reference dose of 0.1 ug/kg body weight/day, exposure data (for example, the amount of methylmercury ingested, inhaled, or absorbed per day), and data about the target population to be protected. The U.S. EPA criterion (U.S. EPA 2001) is 0.3 mg/kg wet weight methylmercury in fish muscle tissue. Since nearly 100 percent of the mercury in fish muscle is methylmercury, the criterion can reasonably be considered a total mercury criterion.

### *Polychlorinated Biphenyls (PCBs)*

The U.S. EPA has not issued a human health-based criterion for PCBs in fish tissue, and Indiana's WQS do not contain a numeric concentration criterion for PCBs in the edible portion of fish tissue. However, Indiana has adopted human health WQS to protect the public from adverse impacts due to:

- (1) exposure through public drinking water supplies withdrawn from surface waters; and
- (2) nondrinking water exposures, such as consumption of fish caught in Indiana lakes, rivers, and streams.

Although human consumption of sport fish is not explicitly described in Indiana's WQS, fish consumption values are included as part of the calculation of the human health criteria intended to ensure that the levels of a carcinogenic chemical in fish are not at levels harmful to people who consume them.

Without a U.S. EPA criterion derived specifically for fish tissue concentration of PCBs, using the U.S. EPA's methodology for deriving ambient water quality criteria for the protection of human health (U.S. EPA 2000b) to calculate a concentration value for PCBs is a reasonable alternative, that results in a criterion that is more readily applicable to Sections 305(b) and 303(d) water quality assessments than using FCA grouping levels. IDEM's benchmark criteria for mercury and PCBs in fish tissue are shown in Table 10.

Table 10: WQS-based assessment thresholds for mercury and PCBs.

Mercury (Hg)		
Concentration in Fish Tissue	Fully Supporting	Not Supporting
	Less than or equal to 0.3 (mg/kg wet weight)	Greater than 0.3 (mg/kg wet weight)
Polychlorinated Biphenyls (PCBs)		
Concentration in Fish Tissue	Fully Supporting	Not Supporting
	Less than or equal to 0.02 (mg/kg wet weight)	Greater than 0.02 (mg/kg wet weight)

### *Relationship of IDEM's WQS-Based Criteria to the FCA*

Fish consumption advisories are determined based on the quantity of a chemical in fish, such as milligrams of chemical per kilogram of the edible portion of fish tissue (mg/kg). WQS, on the other hand, are expressed as the quantity of the chemical in water, such as micrograms of a chemical per liter

of water (ug/L). The exposure assumptions upon which the human health criteria are based can be used to calculate a maximum safe fish concentration. That fish concentration value can then be directly compared to the values used to issue fish consumption advisories, to determine whether the advisory is less or more protective than the WQS.

The levels of fish tissue contaminants that trigger a FCA and the levels of fish tissue contaminants on which the WQS criteria are based are derived using the same contaminant result, reference dose, and body weight assumptions. Although EPA derived its recommended screening value for a fish advisory limit for mercury and human health methylmercury criterion from virtually identical methodologies, it is important to clarify the distinctions between the two values. They are consistently derived, but, because the two values differ in purpose and scope, they diverge at the risk management level. Fish advisories are intended to inform the public about how much consumers should limit their intake of individual fish species from certain waterbodies. Alternatively, the human health criterion is used as the basis for non-regulatory and regulatory decisions. The criterion serves as guidance for use in establishing WQS, which, in turn, serve as a benchmark for attainment, compliance, and enforcement purposes.

FCAs are intended to provide for the protection of human health over a lifetime of exposure, maximizing the benefits of eating fish while minimizing the risk. The calculations used to determine if a FCA should be issued are based on the contaminant concentration found in fish, which is treated as a constant while consumption rates are allowed to vary (how much fish a person can safely consume without exceeding a particular dose rate). Allowing for different consumption rates makes it possible to safely consume fish that have different levels of contamination. The recommended consumption rate is reduced as fish tissue contaminant concentrations increase. In contrast, WQS criteria calculations start with an assumed level of fish consumption, and derive a criterion for a safe level of exposure to the contaminant in the fish for those who consume them. Because the consumption rate is held constant, the resulting criterion can be applied consistently to all waters. FCAs are expressed for a given waterbody in terms of certain species within certain size ranges. Very few FCAs apply to all fish in a given waterbody, which limits their utility for water quality assessment purposes.

IDE�'s assessment methodology for evaluating fish tissue data is directly applicable to all waters and uses the revised human health-based water quality criterion for methylmercury (U.S. EPA 2001) and a criterion for PCBs derived from the U.S. EPA's (2000b) human health methodology.

While mindful of the differences in purpose and function of the FCA and the 303(d) list, IDE�'s methodology maintains as much consistency as possible between the protocols that ISDH, IDE�, and IDNR use to assess data for the FCA and the protocols that IDE� uses to assess data for the determination of impairment. For PCBs, the WQS-based threshold is lower than the FCA threshold for a Group 2 advisory. Therefore, there is a concentration range where there could be a WQS exceedance but still unlimited consumption. However, the threshold for mercury is higher than that which would trigger a Group 2 advisory (Table 11). For mercury, given the existing exposure assumptions upon which the water quality criteria are based, issuance of a FCA does not necessarily indicate an exceedance of WQS.

Table 11: Fish tissue concentrations for levels of consumption advice protective of sensitive populations established by ISDH for mercury and total PCBs and its correspondence to an impairment condition as determined by the WQS criteria.

Mercury	Fish Tissue Concentration (mg/kg)				
	Less than 0.05	0.05 – 0.2	0.2 – 1.0	1.0 – 1.9	Greater than 1.9
FCA Groups	Group 1	Group 2	Group 3	Group 4	Group 5
Consumption Advice (FCA)	unlimited	1 meal per week	1 meal per month	1 meal every 2 months	No consumption
PCBs	Fish Tissue Concentration (mg/kg)				
	Less than 0.05	0.05 – 0.2	0.2 – 1.0	1.0 – 1.9	Greater than 1.9
FCA Groups	Group 1	Group 2	Group 3	Group 4	Group 5
Consumption Advice (FCA)	unlimited	1 meal per week	1 meal per month	1 meal every 2 months	No consumption

\*Shaded cells indicate consumption advice that corresponds to nonsupport and an impaired condition using the WQS-based criteria.

The consumption rates expressed in Indiana's WQS for human health are 15.0 g/day for waters in the Great Lakes basin (327 IAC 2-1.5-14) and 6.5 g/day for downstate waters (327 IAC 2-1-8.6). For mercury, IDEM defaulted to the U.S. EPA water quality criterion 0.3 mg/kg methylmercury wet weight determined at a consumption rate of 17.5 g/day) for mercury in fish tissue, and a reference dose of 0.1 ug/kg body weight/day (U.S. EPA, 2001).

For calculating the criterion for PCB in fish tissue, IDEM used the same consumption rate the U.S. EPA used to calculate its criterion for mercury in fish tissue for the general population, which is 17.5 g/day national consumption rate. The use of a higher consumption rate in the PCB calculation is consistent with that used by the U.S. EPA and results in a more protective criterion than applying the consumption rate expressed for either the Great Lakes basin or downstate waters. The same holds true for mercury. IDEM's decision to use the U.S. EPA's criterion value for mercury in fish tissue was a policy decision based on the fact that the U.S. EPA's criterion is more protective. Calculations for both criteria are provided at the end of this appendix.

#### *Assessment method using the WQS-based criteria*

IDEF's assessment methodology for evaluating fish tissue data is summarized in Table 12, and reflects a conservative approach intended to both identify waters in which the data indicate impairment for mercury or PCBs, or both, and to provide for the protection of human health.

For PCBs, all samples from a given sampling reach must have results below the benchmark for PCBs in order to be assessed as fully supporting, and all waters with a sample result exceeding the benchmark are classified as impaired. This is a highly conservative approach that considers only the highest sample PCB concentration, which may be one of a number of samples collected at the site.

For mercury, IDEM calculates a single, trophic level, consumption rate-weighted, arithmetic mean result for the site based on all the samples collected during a given sampling event. This result is then compared to the criteria to determine use support. All waters with a trophic level, consumption rate-weighted, arithmetic mean result exceeding the benchmark are classified as impaired. The calculation IDEM uses, provided at the end of this appendix, apportions the national default consumption rate of 17.5 g/day across three trophic levels based on the amount and type of fish (by trophic level) that people might be consuming and, as such, more accurately characterizes human exposure and, therefore, fishable use support.

Table 12: Methods for determining fish consumption use support in Indiana waters.

Determining Use Support		
	Fully Supporting	Not Supporting
Mercury in Fish Tissue	Trophic level weighted arithmetic mean concentration values for all sampling events are less than 0.3 mg/kg wet weight	Trophic level weighted arithmetic mean concentration values for one (1) or more sampling events are greater than 0.3 mg/kg wet weight
PCBs in Fish Tissue	Actual concentration values for all samples are less than 0.02 mg/kg wet weight	Actual concentration values for one/more samples are greater than 0.02 mg/kg wet weight

Sport fish are of particular importance to the question of consumption because they comprise the majority of fish taken by anglers. Most sport fish are predator species but also include omnivores such as carp. Therefore, to properly determine the degree to which a waterbody supports fish consumption, an appropriate methodology takes into consideration both the types of fish being caught and how differences in species affect the concentrations of the contaminant in question.

The differences in IDEM's assessment methods for PCBs and mercury are a function of how these contaminants accumulate in the tissues of fish once ingested by them. PCB concentrations in fish are primarily a function of their fat content while mercury concentrations are more a function of their trophic level. Because PCBs accumulate in the fatty tissues of fish, concentrations tend to be higher in more fatty species such as carp and catfish as opposed to species such as bass and sunfish, which are leaner by comparison. In contrast, mercury tends to be higher in predator species because it biomagnifies up the food chain as larger fish consume smaller fish containing mercury.

The method of calculating a trophic level-weighted, arithmetic mean for mercury is not appropriate for PCBs, because trophic levels are less predictive than individual species of PCB concentrations in fish caught at a given site. As a result, trophic levels are less representative of the amount of PCBs a person might consume.

Based on the way that PCBs bioaccumulate in fish tissue (by accumulating in their fatty tissue), IDEM continues to use the results of individual samples for the purposes of assessment, and the type of fish species continues to be a factor in assessment. Based on the U.S. EPA's 2010 guidance, the particular species is no longer as relevant for evaluating total mercury concentration (most of which is methylmercury) in fish tissue, which is more a function of trophic level for determining fish consumption use support. For evaluating mercury in fish tissue, IDEM uses a trophic level, geometric mean to calculate a consumption-weighted, arithmetic mean for the site, which considers consumption levels across all trophic levels and includes all species types.

#### *IDEML's Decision-Making Process for Determining the Degree to Which Indiana Waters Support Fish Consumption Based on Mercury and PCB Concentrations in Fish Tissue*

The following describes the steps in IDEM's assessment process for assessing the "fishable use" of Indiana waters.

##### *Step 1. Determine adequate data for assessment*

The adequacy of a data set for the purposes of making a 305(b) assessment is determined by the analytical quality of the data set as well as the amount and age of the data. All of these factors can affect the degree to which the data accurately represent waterbody conditions.

One sampling event is considered sufficient for assessment purposes. At a given sampling event, composite samples are made for each species within a given size class collected at the site, which provides one or more species-specific results for assessment. For PCBs, results for each individual sample are compared to the 0.02 mg/kg criterion to make the assessment. For mercury, a consumption-

weighted, arithmetic mean is calculated for each sampling event using the results from all the samples collected. The arithmetic mean result for each sampling event is treated as an individual result and compared to the 0.3 mg/kg criterion. Multiple sampling events within a single year or multiple years for a site are not pooled together for either mercury or PCB assessments.

U.S. EPA guidance suggests that, while all readily available data should be reviewed, 305(b) assessment decisions should be based on data five or fewer years old. However, IDEM has established 12 years as the appropriate index period for the purposes of evaluating fish tissue data. Given the persistent nature of fish tissue contaminants in the environment, aggregating data over several years minimizes the effects of temporal, spatial, and species-level variability on the assessment process. Based on IDEM's sampling strategy, an index period of 12 years ensures two full cycles of fish tissue data for use in evaluating fish consumption use support.

Each contaminant is assessed independently. Therefore, the use is considered impaired, and the waterbody is listed based on an assessment of either mercury or PCBs in fish tissue even if results for the other indicate full support.

Independent applicability is also applied to all results obtained within the index period for assessment. By definition, the index period is the period of time over which the data may reasonably be considered representative of conditions in a given waterbody. A single, older result collected within the index period may well be representative of the variability within the waterbody, and is considered equally valid as any other sample collected in the same index period.

Therefore, where there are conflicting results from samples collected within the index period, the waterbody is assessed as impaired regardless of when in the index period the exceeding results were collected, and even if the more recent results indicate full support.

#### *Step 2: Apply WQS-based concentration thresholds to determine use support*

The WQS-based assessment thresholds shown in Table 10 were applied to all lakes and streams for which sufficient fish tissue data were available. IDEM's methods for applying these criteria are summarized in Table 12. All waters found to be not supporting due to either mercury or PCBs, or both, are categorized as impaired and placed in Category 5B of Indiana 303(d) List of Impaired Waters.

#### *Step 3: Determine the appropriate geographical extent to which the assessment applies*

In some cases, fish can be very mobile and difficult to attribute to a discrete portion of a lake or river reach. In determining the appropriate geographical extent to which results can be confidently applied, IDEM follows the general rules described below. Unless otherwise stated, the same general rules are applied to assessments of both PCBs and mercury in fish tissue.

### **STREAM ORDER CONSIDERATIONS**

For flowing waters, stream order is the primary factor considered in determining the appropriate distance over which the results should be applied. Stream order is a good indicator of relative stream size, and, to the extent that size affects flow, the size of a given stream has a significant effect on species and sizes of fish that might be caught there.

Generally, in cases where significant differences in stream order exist in a given watershed, results are applied only to the stream on which they were obtained. This is because the fish community found in a third or fourth order stream might reasonably be expected to be very different from the fish communities found in its first and second order tributaries. Likewise, the expectations for the type and sizes of fish found in a fifth order stream would be different from those for a third or fourth order stream. Given this, results obtained from fifth order and greater streams are limited only to the mainstem and are not considered representative of their tributaries. Because of the significant effects that stream

order has on the structure of the fish community in a given stream, basing extrapolations primarily on stream order allows us to more reliably apply fish tissue results on a stream-specific basis.

Most of Indiana's larger streams and rivers (third, fourth, and fifth order streams) have been monitored for many years, resulting in very robust data sets. On these streams, results are applied to greater lengths where bounding samples upstream and downstream were available.

Results for many of Indiana's smaller streams (first and second order streams) are generally more limited. On these waters, results are applied only to the 12-digit watershed boundary except in cases where additional results from sites in an upstream or downstream watershed support assessment over a greater distance. In these cases, assessments are limited to mainstem reaches between the sites and are not applied to their tributaries. Results from a mainstem site are also applied to its headwaters if obtained in the same watershed or the watershed immediately downstream.

## **BACKGROUND CONDITIONS**

For PCBs, relative concentrations are used as an indicator of background conditions. Values greater than 1,000 ppb for PCBs are considered suggestive of point sources, most of which are known legacy sources of this contaminant. Values lower than this can be reasonably attributed to atmospheric and biological redistribution of contaminants or low level nonpoint sources, and are considered representative of background conditions. Therefore, for PCBs, monitoring results in a smaller watershed are also extrapolated into other streams of similar stream order in that watershed when values are consistently low such as to suggest background conditions. In cases where the sampling site is located in a particularly large or hydrologically- complex watershed or far upstream from most or all streams in the watershed, extrapolations are more limited. Extrapolations around sites with very high PCB concentrations suggesting point sources are also limited.

Unlike PCBs, there is no concentration value for mercury that is considered particularly suggestive of point sources. High mercury values in fish tissue are more indicative of localized methylation processes affecting the amount of mercury available for uptake than any sources of contamination. Background conditions for mercury in fish tissue are very difficult to determine because they are highly dependent on the structure of the fish community, which differs significantly depending on the size of the stream in question. While it may be possible to predict background conditions for a given stream order to guide extrapolations of results for mercury in fish tissue, stream order itself remains a more reliable indicator of the extent to which those results may be representative for the purpose of determining use support.

## **RESULTS FROM LAKE SAMPLES**

All fish tissue data are aggregated for a given lake or reservoir unless there is evidence that fish caught from certain parts of the lake were isolated and may have been exposed to a different level of contamination.

Fish community structure within a lake can clearly influence the fish community structure for some distance in streams flowing from lakes. Given this, results from lakes and reservoirs are applied downstream into adjacent watersheds in cases where there are downstream data to support the assessment. In cases where there are no data available for out-flowing streams, results for lake samples are applied only to the lake from which they are collected.

## **AQUATIC LIFE USE ASSESSMENTS**

### *Use Support Criteria for Biological Data*

Biological assessments for streams are based on the sampling and evaluation of either the fish communities, or benthic aquatic macroinvertebrate communities, or both. Indices of Biotic Integrity

(IBI) for fish and macroinvertebrate IBI (mIBI) assessment scores, or both, were calculated and compared to regionally-calibrated models. In evaluating fish communities, streams rating as “fair” or worse are classified as non-supporting for aquatic life uses. For benthic aquatic macroinvertebrate communities, individual sites are compared to a statewide calibration at the lowest practical level of identification for Indiana. All sites at or above background for the calibration are considered to be supporting aquatic life uses. Those sites rated as moderately or severely impaired in the calibration are considered to be non-supporting. Waters with identified impairments to one or more biological communities are considered not supporting aquatic life use. The biological thresholds Indiana uses to make use attainment decisions are shown in Table 13 to provide greater context for understanding the range of biological conditions that is considered either fully supporting or impaired.

IDE�'s aquatic life use assessments are never based solely on habitat evaluations. However, habitat evaluations are used as supporting information in conjunction with biological data to determine aquatic life use support. Such evaluations, which take into consideration a variety of habitat characteristics as well as stream size, help IDE� to determine the extent to which habitat conditions may be influencing the ability of biological communities to thrive. If habitat is determined to be driving a biological community impairment (IBC) and no other pollutants that might be contributing to the impairment have been identified, the IBC is not considered for inclusion on IDE�'s 303(d) List of Impaired Waters (Category 5). In such cases, the waterbody is instead placed in Category 4C for the biological impairment.

Table 13: Biological thresholds used to determine aquatic life use support.

Biotic Index Score and Associated Assessment Decision	Integrity Class	Corresponding Integrity Class Score	Attributes
<b>Macroinvertebrate Community Data Collected With Artificial Samplers (used in assessments prior to 2010 cycle)</b>			
mIBI greater than or equal to 1.8 (artificial substrate sampler) indicates full support	Excellent	6.0-8.0	NA
	Good	4.0-5.9	NA
	Fair	1.8-3.9	NA
mIBI less than 1.8 (artificial substrate sampler) indicates impairment	Poor	1.0-1.7	NA
	Very Poor	0-0.9	NA
<b>Macroinvertebrate Community Data Collected Using Kick Methods (used in assessments prior to 2010 cycle)</b>			
mIBI greater than or equal to 2.2 (kick methods) indicates full support	Excellent	6.0-8.0	NA
	Good	4.0-5.9	NA
	Fair	2.2-3.9	NA
mIBI less than 2.2 (kick methods) indicates impairment	Poor	1.0-2.1	NA
	Very Poor	0-0.9	NA

Biotic Index Score and Associated Assessment Decision	Integrity Class	Corresponding Integrity Class Score	Attributes
<b>Macroinvertebrate community data collected using multihabitat (mHAB) methods (used in assessments from the 2010 cycle to present)</b>			
mIBI greater than or equal to 36 indicates full support	Excellent	53-60	Comparable to "least impacted" conditions, exceptional assemblage of species.
	Good	45-52	Decreased species richness (intolerant species in particular), sensitive species present.
	Fair	36-44	Intolerant and sensitive species absent, skewed trophic structure.
mIBI less than 36 indicates impairment	Poor	23-35	Many expected species absent or rare, tolerant species dominant.
	Very Poor	13-22	Few species and individuals present, tolerant species dominant
	No Organisms	12	No macroinvertebrates captured during sampling.
<b>Fish Community Data</b>			
IBI greater than or equal to 36 indicates full support	Excellent	53-60	Comparable to "least impacted" conditions, exceptional assemblage of species.
	Good	45-52	Decreased species richness (intolerant species in particular), sensitive species present.
	Fair	36-44	Intolerant and sensitive species absent, skewed trophic structure.
IBI less than 36 indicates impairment	Poor	23-35	Top carnivores and many expected species absent or rare, omnivores and tolerant species dominant.
	Very Poor	1-22	Few species and individuals present, tolerant species dominant, diseased fish frequent.
	No Organisms	0	No fish captured during sampling.

#### *Revisions to IDEM's Use Support Criteria for Biological Data*

IDEF's use support criteria for fish community and macroinvertebrate community data have undergone significant changes since they were first adopted in 1996. Table 14 summarizes the evolution of IDEM's criteria for making assessments with biological data.

The biological criteria that were developed for both fish and macroinvertebrate communities for the 2004 305(b) and 303(d) assessment and listing cycle were calibrated to reference conditions throughout Indiana and applicable to all waters. However, the resulting criteria were applied only to the basins being assessed at the time. For the 2006 cycle, IDEM began reviewing all aquatic life use support assessments made in the remaining basins throughout the state prior to 2002 to ensure their consistency with the statewide criteria developed in 2004. This review was completed for the 2008 cycle.

Although the fish community criteria developed in 2004 remains in effect today, IDEM revised its assessment methods for evaluating macroinvertebrate data for the 2010 cycle.

The statewide mIBI developed for the 2004 cycle was based on riffle/run samples collected throughout the state from 1990 through 1994. Office of Water Quality (OWQ) used the riffle/run

method from 1996 through 2003, collecting samples at some of the same sites sampled for the original calibration of the index that were randomly selected for follow-up sampling. Beginning in 1998, the OWQ also collected samples at probabilistic sites chosen for the Watershed Monitoring Program where a suitable riffle/run habitat was present. Unfortunately, less than half of the probabilistic sites sampled during this time had riffle/run type habitats within the allowed distance, which reduced the effectiveness of the riffle/run method as a monitoring tool. This necessitated the development of a macroinvertebrate sampling method which could be used at all probabilistic sites, regardless of habitat.

The new multi-habitat method (mHAB) differs primarily from the riffle/run method in that it samples all habitats available at a stream site using a D-frame net instead of the kick screen used in the riffle/run method. In 2004, 62 sites (a subset selected from all sites previously sampled with the riffle/run method between 1990 and 2003), were re-sampled with the new MHAB method. The idea was to develop an index calibrated not on the best possible reference conditions, but on a normal distribution of stream conditions based on mIBI scores obtained at previously sampled sites. It was later determined that this was too few samples to develop an efficient statewide index; therefore, these samples were combined with probabilistic samples collected in 2005, 2006, and 2007 (a total of 247 samples) to develop the index currently in use.

Twelve metrics were chosen from a pool of more than 100 possible metrics in the development of the new mIBI. These 12 metrics provided the best correlation to the data and describe a diversity of features that characterize the quality of a stream or river. The scores for each individual metric are totaled and can range from 12 to 60. As with the fish community IBI, mIBI scores less than 36 are considered non-supporting of aquatic life use while those greater than or equal to 36 are supporting of aquatic life use.

Table 14: Evolution of the criteria used in making aquatic life use assessments with biological data.

Cycle	Criteria Development and Changes
1998	<p>IDEML used Karr's 1986 Index of Biotic Integrity (IBI) Classification and Attributes Table to establish criteria to apply to fish community (IBI) data for use support assessments:</p> <ul style="list-style-type: none"> <li>• IBI greater than or equal to 44 = Fully supporting (Excellent/Good)</li> <li>• IBI between 44 and 22 = Partially supporting (Fair/Poor)</li> <li>• IBI less than 22 = Not supporting (Very Poor/No Fish)</li> </ul> <p>IDEML's criteria for macroinvertebrate community (mIBI) data collected using kick methods:</p> <ul style="list-style-type: none"> <li>• mIBI greater than or equal to 4 = Fully supporting</li> <li>• mIBI between 4 and 2 = Partially supporting</li> <li>• mIBI less than 2 = Not supporting</li> </ul>
2000	<p>IDEML reviewed fish community data from 1990-1995 (a total of 831 samples) to determine new, more accurate limits reflective of Indiana fish communities by subtracting <math>\frac{1}{2}</math> standard deviation from the statewide mean to calculate the following criteria:</p> <ul style="list-style-type: none"> <li>• IBI greater than or equal to 34 = Fully supporting</li> <li>• IBI between 34 and 32 = Partially supporting</li> <li>• IBI less than 32 = Not supporting</li> </ul> <p>Criteria for macroinvertebrate community data were unchanged.</p>
2002	<p>Based on IDEML's adoption of the U.S. EPA's integrated reporting format, the category for partially supporting was eliminated for both fish community data and macroinvertebrate community data:</p> <ul style="list-style-type: none"> <li>• IBI greater than or equal to 32 = Fully supporting</li> <li>• IBI less than 32 = Not supporting</li> </ul> <p>Criteria for macroinvertebrate community data were unchanged.</p>
2004 to 2008	<p>IDEML completes its first five-year basin monitoring rotation. After reviewing the narrative aquatic life use criteria and definitions of a well-balanced aquatic community in Indiana's water quality standards (327 IAC 2-1 and 327 IAC 2-1.5) IDEML determined that IBI values previously considered partially supporting are reflective of poorer conditions and should be classified as not supporting. The resulting criteria were applied to all basins in Indiana:</p> <ul style="list-style-type: none"> <li>• IBI greater than or equal to 36 = Fully supporting</li> <li>• IBI less than 36 = Not supporting</li> </ul> <p>With a more robust set of macroinvertebrate community data, IDEML was also able to calibrate its criteria for this type of data, developing specific criteria applicable to all basins in the state.</p> <p>For samples collected with an artificial substrate sampler:</p> <ul style="list-style-type: none"> <li>• mIBI greater than or equal to 1.8 = Fully supporting</li> <li>• mIBI less than 1.8 = Not supporting</li> </ul> <p>For samples collected using kick methods:</p> <ul style="list-style-type: none"> <li>• mIBI greater than or equal to 2.2 = Fully supporting</li> <li>• mIBI less than 2.2 = Not supporting</li> </ul>
2010 to present	<p>Criteria for fish community data remain unchanged.</p> <p>IDEML developed a new mIBI using mHAB sampling methods that accounts for all habitat types available at a given site and which is applicable in all basins in the state. All samples are collected using a D-frame net, and mIBI scores range from 12-60:</p> <ul style="list-style-type: none"> <li>• mIBI greater than or equal to 36 = Fully supporting</li> <li>• mIBI less than 36 = Not supporting</li> </ul>

## CONSOLIDATED LISTING METHODOLOGY

For the development of its 303(d) List of Impaired Waters, IDEM has followed, to the degree possible, the 305(b) and 303(d) reporting methods outlined in the U.S. EPA's Guidance for 2006 Assessment, Listing and Reporting Requirements Pursuant to Sections 303(d), 305(b) and 314 of the CWA (U.S. EPA, 2005), as well as the additional guidance provided in the U.S. EPA memorandums containing information concerning CWA Sections 303(d), 305(b), and 314 integrated reporting and listing decisions for the 2008, 2010, 2012, 2014, and 2016 cycle (U.S. EPA, 2006-2013). The 303(d) list was developed using IDEM's 305(b) ADB. Interpretation of the data and listing decisions take into account IDEM's assessment methodologies and the U.S. EPA's guidance.

Data from a given monitoring site are considered representative of the waterbody for that distance upstream and downstream in which there are no significant influences to the waterbody that might cause a change in water quality. Using this same rationale, data may also be extrapolated to some distance into tributaries upstream of a given sampling location. Waterbody AUs with one or more monitoring sites upstream and downstream and those for which reliable assessments can be made based on extrapolation of representative data are classified as monitored. Only monitored waterbodies are considered for 303(d) listing purposes. Any waters identified as "Not Supporting" of one or more designated uses in accordance with the criteria described in previous sections of this methodology are placed on Indiana's 303(d) List of Impaired Waters.

Interpretation of the data through the 305(b) assessment process and the subsequent 303(d) listing decisions are based in large part on U.S. EPA guidance. U.S. EPA guidance calls for a comprehensive listing of all monitored or assessed waterbodies in the state. Prior to 2006, U.S. EPA required that states place each waterbody into only one category. The U.S. EPA now encourages states to place a waterbody AU into additional categories as appropriate in order to more clearly illustrate where progress has been made in TMDL development and other restoration efforts. Therefore, waterbodies are assigned to one category for each of the following designated uses: aquatic life use, recreational use, fish consumption<sup>12</sup>, and public water supply<sup>13</sup>. The following describes IDEM's categorization of Indiana waters in more detail:

- Category 1 The available data, or information, or both, indicate that all designated uses are supported and no use is threatened. Waters are listed in this category if there are data and/or other information that meet the requirements of Indiana's Consolidated Assessment and Listing Methodology (CALM) to support a determination that all designated uses are supported and no designated use is threatened.
- Category 2 The available data or information, or both, indicate the individual designated use is supported. Waters are listed in this category if there are data or other information, or both, available that meet the requirements of Indiana's CALM to support a determination that the individual designated use is supported.

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<sup>12</sup> Fish consumption is not a designated use in Indiana's WQS. IDEM assesses Indiana waters for fish consumption pursuant to current U.S. EPA policy and in keeping with CWA goals, which are reflected in Indiana's WQS (327 IAC 2-1-1.5 and 2-1.5-3).

<sup>13</sup> Applicable only to waters that serve as a source of water for a public water system.

Category 3 The available data or other information, or both, are insufficient data to determine if the individual designated use is supported. Waters are listed in this category if there are no data or other information, or both, to determine whether the individual designated use is supported, or if the available data or information, or both, are not consistent with the requirements of Indiana's CALM.

Category 4 The available data or information, or both, indicate that the individual designated use is impaired or threatened but a total maximum daily load (TMDL) is not required based on one of the following conditions:

- A. A TMDL for one or more pollutants has been completed and approved by U.S. EPA and is expected to result in attainment of all WQS applicable to the designated use.
- B. Other pollution control requirements are reasonably expected to result in the attainment of all WQS applicable to the designated use in a reasonable period of time. Consistent with the regulation under 40 CFR Part 130.7(b)(i),(ii), and (iii), waters are listed in this subcategory where other pollution control requirements required by local, state, or federal authority are stringent enough to achieve any WQS applicable to the designated use.
- C. Impairment is not caused by a pollutant. Waters are listed in this subcategory if the designated use impairment is not caused by a pollutant but is instead attributed to other types of pollution for which a TMDL cannot be calculated.

Category 5 The available data or information, or both, indicate the individual designated use is impaired or threatened, and a TMDL is required.

- A. This subcategory constitutes the Section 303(d) list of waters impaired or threatened by one or more pollutants for which a TMDL is required. Waters are listed in this category if it is determined in accordance with Indiana's CALM that a pollutant has caused, is suspected of causing, or is projected to cause impairment. Where more than one pollutant is associated with the impairment of a single AU, the AU will remain in Category 5 for each pollutant until the TMDL for that pollutant has been completed and approved by the U.S. EPA.
- B. This subcategory constitutes the Section 303(d) list of waters that are impaired due to the presence of mercury or PCBs, or both, in the edible tissue of fish collected from the AUs at levels exceeding Indiana's human health criteria for these contaminants.

Because each situation is unique, and resources and data sets are sometimes limited, the 303(d) listing process may, at times, require IDEM staff to apply best professional judgment. To help stakeholders understand how designated use support was determined for individual waterbodies of interest, IDEM will make available upon request its water quality assessment notes for any waterbody AU, including any assessed in a different manner than indicated in its Consolidated Assessment and Listing Methodology.

The current 303(d) List of Impaired Waters includes impairments identified on previous 303(d)

lists, which still require TMDL development. For an AU to be listed, it must have been assessed using representative data, and the data must support its listing. Any data collected internally by IDEM used for listing decisions must meet the agency's quality assurance and quality control requirements as outlined in IDEM's surface water quality monitoring Quality Assurance Project Plan (QAPP). Data collected from external sources must meet the requirements articulated in the technical guidance for IDEM's External Data Framework (IDEM, 2015), which mirror those in IDEM's surface water quality monitoring QAPP for data considered usable for the purposes of CWA Sections 305(b) water quality assessments and 303(d) listing decisions.

## **DELISTING OF IMPAIRMENTS**

U.S. EPA's guidance does not change existing rules for listing and delisting. The existing regulations require states, at the request of the U.S. EPA's Regional Administrator, to demonstrate good cause for not including impairments on the 303(d) list that were included on previous 303(d) lists (pursuant to 40 CFR Part 130.7(b)(6)(iv)). In general, IDEM will only consider delisting an AU if one of the following is true:

- New data indicate that WQS are now being met for the AU under consideration. This would typically occur during IDEM's scheduled assessments when reviewing data collected through IDEM's monitoring programs.
- The assessment or listing methodology, or both, has changed, and the AU under consideration would not be considered impaired under the new methodology.
- An error is discovered in the sampling, testing, or reporting of data that led to an inappropriate listing. IDEM will review previous assessments and 303(d) listings when there is reason to believe that the original assessment was not valid. Reassessment (review of previous assessment or 303(d) listing decisions) typically occurs as a result of ongoing quality assurance and quality control (QA/QC) of IDEM's ADB, or through inquiry by IDEM staff or external parties. Under these circumstances, the 305(b)/303(d) coordinator works with the IDEM staff initiating the question or receiving it from the external party to gather the necessary information and consult with other staff as needed to resolve the question. During reassessment, several types of information are considered, including data quality issues, past assessment methodologies, land use data, historical information from the public, or other relevant information. Regardless of the situation, no assessment is dismissed as invalid based solely on the age of the data.
- If it is determined that another program, besides the TMDL program, is better-suited to address the water quality problem, or the problem is determined not to be caused by a pollutant (see Categories 4B<sup>14</sup> and 4C above).
- A TMDL has been completed, and the waterbody AU is expected to meet WQS after implementation of the TMDL (see Category 4A above).

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<sup>14</sup> A decision to list a water in Category 4B using 40 CFR Part 130.7(b)(1)(i) must be supported by the issuance of technology-based effluent limitations required by Sections 301(b), 306, 307 or other sections of the CWA. A decision to list in Category 4B using Part 130.7(b)(1)(ii) must be supported by the issuance of more stringent effluent limitations required by federal, state or local authority. The U.S. EPA expects that the state will provide a rationale for why it believes that these effluent limits will achieve WQS within a reasonable period of time. Placement of waters in Category 4B based on Part 130.7(b)(iii) must be supported by the existence of "other pollution control requirements (for example, best management practices) required by local, state, or federal authority" that are stringent enough to implement WQS. EPA expects that the state will demonstrate that these control requirements will achieve WQS within a reasonable period of time.

## **TMDL DEVELOPMENT AND PRIORITIZATION FOR OHIO RIVER IMPAIRMENTS**

Because the Ohio River is a boundary between states and U.S. EPA Regions, the development of a TMDL for the river will involve more than one state. To date, no TMDLs have been completed for the reaches of the Ohio River that border Indiana. However, ORSANCO is working with Ohio, West Virginia, Kentucky, Illinois, and Indiana (IDEM) to assist U.S. EPA Regions 3, 4, and 5 in completing a bacteria TMDL for the entire river.

## **TMDL DEVELOPMENT AND PRIORITIZATION FOR ALL OTHER INDIANA WATERS**

The CWA does not clearly define the timeline for TMDL development. However, states are required by 40 CFR Part 130.7 to include with their 303(d) lists a priority ranking of impaired waters that will be targeted for TMDL development in the next two years. For each 303(d) listing cycle, IDEM works with U.S. EPA Region 5 to determine IDEM's short-term TMDL schedule.

In addition to developing a short term list of TMDL priorities every two years, IDEM has also developed a long term schedule to guide TMDL development through 2022. This schedule is included in the Agency's TMDL Program Priority Framework, which describes IDEM's process for implementing U.S. EPA's long term vision for assessment, restoration, and protection under the CWA Section 303(d) program.

U.S. EPA announced its long term vision in 2013 to improve implementation of the CWA 303(d) Program. In order to achieve the goals of its vision, U.S. EPA required states to develop a framework for prioritizing impaired waters for TMDL development.

IDEM's 303(d) TMDL Program Priority Framework specifically describes IDEM's methods for prioritizing waters for TMDL planning and watershed restoration. IDEM submitted the framework and its long term schedule to U.S. EPA on July 8, 2015. U.S. EPA has since reviewed IDEM's Priority Framework and in a letter to IDEM dated September 16, 2015, agreed that it meets the goals of its new long term vision. In the future, IDEM may need to revise its schedule for TMDL development in the short or long term depending on unanticipated factors that can impact IDEM's TMDL monitoring activities and/or development. In such cases, IDEM will follow the methods described in its Program Priority Framework to determine any necessary changes in order to help ensure ongoing consistency with U.S. EPA's long term vision.

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## CALM Attachment 1

### Comparisons of Indiana's Water Quality Criteria to ORSANCO'S Pollution Control Standards and Other Criteria for Making Designated Use Support Assessments for the Ohio River

Table A-1: Comparison of criteria used to determine recreational use support.

Indicator	Type of Criteria	ORSANCO's Recreational Use Criteria	Indiana's Recreational Use Criteria	Most Stringent Criteria [1]
<i>E. coli</i>	Geometric Mean	<p>Applicable April-October (Recreational Season)</p> <p>May not exceed 130 cfu/100 mL as a 90-day geometric mean based on no less than five samples per month</p>	<p>Applicable April-October (Recreational Season)</p> <p>May not exceed 125 cfu/100 mL based on no less than five equally spaced samples over a 30-day period.</p> <p>If five equally spaced samples are not available for the calculation of a geometric mean, single sample maximum applies</p>	Indiana
<i>E. coli</i>	Single Sample Maximum	<p>Applicable April-October (Recreational Season)</p> <p>May not exceed 240 cfu/100 mL in more than 25% of samples</p>	<p>Applicable April-October (Recreational Season)</p> <p>May not exceed 235 cfu/100 mL in any one sample in a thirty day period</p> <p>Except</p> <p>In cases where there are at least ten samples at a given site, up to 10% may exceed the single sample maximum</p> <p>If</p> <p>The exceedances are incidental and attributable solely to the discharge of treated wastewater from a wastewater treatment plant as defined in Indiana Code</p> <p>And</p> <p>The geometric mean criterion is met</p>	Indiana

<sup>[1]</sup>Although Indiana's *E. coli* numeric criteria are slightly more stringent than ORSANCO's, unlike Indiana's WQS, ORSANCO's criteria do not allow exceptions. ORSANCO's assessment methodology also incorporates analysis of single sample results, which provides a more robust assessment than Indiana's combined criteria and assessment methodology can. Indiana therefore accepts ORSANCO's assessments of recreational use support for the Ohio River.

Table A-2: Comparison of criteria used to determine fish consumption use support.

Indicator	Type/Source of Criteria	ORSANCO Criteria	Indiana Criteria	Most Stringent Criteria
Methylmercury in Fish Tissue (ug/L)	Human Health Criterion for Methylmercury (U.S. EPA, 2001)	0.3	0.3	Equally Stringent
Total Mercury in Water (ug/L)	Aquatic Life CAC (4-day average) Outside the Mixing Zone (Indiana) Not to exceed (ORSANCO)	0.012	0.012	Equally Stringent
Dioxin (2, 3, 7, 8-TCDD) in Water (ug/L)	CCC Human Health (30-day average) Outside the Mixing Zone (Indiana) CWA Section 304(a) Human Health Criterion for Priority Pollutants (ORSANCO)	0.000000005	0.0000001	ORSANCO
Polychlorinated Biphenyls (PCBs) in Water (ug/L) <sup>[1]</sup>	CCC for Human Health (30-day average) Outside the Mixing Zone (Indiana) CWA Section 304(a) Human Health Criterion for Priority Pollutants (ORSANCO)	0.000064 <sup>[2]</sup>	0.00079	ORSANCO

<sup>[1]</sup> Indiana has two criteria for PCBs which could be used to make fish consumption use assessments, both of which address different ways of preventing exposure through consumption of fish, one by preventing bioaccumulation of the contaminant in the fish and the other to protect against exposure through the consumption of contaminated fish. The criterion shown in the table is the CCC Human Health criterion for waters outside the mixing zone. Human health criteria are calculated for and intended to protect from exposure through public drinking water supplies withdrawn from surface waters, and nondrinking water exposures such as consumption of fish. Therefore, the human health criteria (both ORSANCO's and Indiana's) are appropriate for use in fish consumption assessments. The Aquatic Life CAC of 0.014 ug/L for PCBs could be used in a similar manner as the Aquatic Life CAC for total mercury to prevent bioaccumulation of PCBs in fish. However, the Human Health CCC for PCBs is far more protective and is used instead to make fishable use assessments for the Ohio River. The opposite is true for total mercury, which is why the Aquatic Life CAC of 0.012 ug/L is used instead of the Human Health CCC of 0.15 ug/L.

<sup>[2]</sup> This criterion applies to total PCBs (e.g. the sum of all congener or all isomer or homolog or Arochlor analyses).

Table A-3: Comparison of metals criteria used to determine aquatic life use support. Hardness is expressed as mg/L of CaCO<sub>3</sub>.

Metal	Fraction	Acute or Chronic	ORSANCO's Criterion Concentration (ug/L)	ORSANCO's Dissolved Criterion Conversion Factors	Indiana's Criterion Concentration (ug/L)	Indiana's Dissolved Criterion Conversion Factors	Most Stringent Criteria
Mercury <sup>[1]</sup>	Dissolved (ORSANCO) Total (Indiana)	Chronic	0.91	0.85 (dissolved)	0.012 (total)	NA	Indiana
Arsenic <sup>[1]</sup>	Dissolved <sup>[2]</sup>	Chronic	150	1.0	190	1	ORSANCO
Cadmium	Dissolved <sup>[2]</sup>	Chronic	$e^{(0.7409[\ln(\text{hardness})]-4.719)}$	$1.101672 - [\ln(\text{hardness}) * 0.041838]$	$e^{(0.7852[\ln(\text{hardness})]-3.490)}$	$1.101672 - [\ln(\text{hardness}) (0.041838)]$	ORSANCO
Chromium III	Dissolved <sup>[2]</sup>	Chronic	$e^{(0.819[\ln(\text{hardness})]+0.6848)}$	0.86	$e^{(0.8190[\ln(\text{hardness})]+1.561)}$	0.860	ORSANCO
Chromium VI	Dissolved <sup>[2]</sup>	Chronic	11	0.962	11	0.962	Equally stringent
Copper	Dissolved <sup>[2]</sup>	Chronic	$e^{(0.8545[\ln(\text{hardness})]-1.702)}$	0.960	$e^{(0.8545[\ln(\text{hardness})]-1.465)}$	0.960	ORSANCO
Lead	Dissolved <sup>[2]</sup>	Chronic	$e^{(1.273[\ln(\text{hardness})]-4.705)}$	$1.46203 - [\ln(\text{hardness}) * 0.145712]$	$e^{(1.273[\ln(\text{hardness})]-4.705)}$	$1.46203 - [\ln(\text{hardness}) (0.145712)]$	Equally stringent
Nickel	Dissolved <sup>[2]</sup>	Chronic	$e^{(0.846[\ln(\text{hardness})]+0.0584)}$	0.997	$e^{(0.846[\ln(\text{hardness})]+1.1645)}$	0.997	ORSANCO
Selenium	Total	Chronic	5	--	--	--	ORSANCO
Silver	Dissolved <sup>[2]</sup>	Acute	$e^{(1.72[\ln(\text{hardness})]-6.59)}$	--	$e^{(1.72[\ln(\text{hardness})]-6.52)}/2$	0.85	Indiana
Zinc	Dissolved <sup>[2]</sup>	Chronic	$e^{(0.8473[\ln(\text{hardness})]+0.884)}$	0.986	$e^{(0.8473[\ln(\text{hardness})]+0.7614)}$	0.986	Indiana

<sup>[1]</sup> This criterion is expressed in ORSANCO's Pollution Control Standards as "Not to Exceed" and in Indiana's WQS as a four-day average.

<sup>[2]</sup> Unless otherwise shown, dissolved metals criteria are calculated as the total recoverable criterion multiplied by the dissolved criterion conversion factor. Assessments are made by comparing dissolved results against the established or calculated criterion.

Table A-4(a): Comparison of sulfate and cyanide criteria used to determine aquatic life use support. Hardness is expressed as mg/L of CaCO<sub>3</sub>.

Indicator	Type of Criteria	ORSANCO's ALUS Criteria	Indiana's ALUS Criteria	Most Stringent Criteria
Free Cyanide <sup>[1]</sup> (ug/L)	Chronic	5.2	5.2	Equally stringent
Chloride <sup>[2]</sup> mg/L)	Chronic	No criterion	$177.87 * (\text{hardness})^{0.205797} * (\text{sulfate})^{-0.07452}$	Indiana
Sulfate <sup>[3]</sup> (mg/L): Hardness greater than or equal to 100 mg/L but less than or equal to 500 mg/L  And  Chloride (mg/L) greater than or equal to 5 mg/L but less than 25 mg/L	Not to Exceed	No criterion	$[-7.478 + (5.79 * \text{hardness}) + (54.163 * \text{chloride})] * 0.65$	Indiana
Sulfate <sup>[3]</sup> (mg/L): Hardness greater than or equal to 100 mg/L but less than or equal to 500 mg/L  And  Chloride (mg/L) greater than or equal to 25 mg/L but less than or equal to 500 mg/L	Not to Exceed	No criterion	$[1.276 + (5.508 * \text{hardness}) - (1.457 * \text{chloride})] * 0.65$	Indiana
Sulfate <sup>[3]</sup> (mg/L): Hardness less than 100 mg/L  And  Chloride (mg/L) less than or equal to 500 mg/L	Not to Exceed	No criterion	500	Indiana
Sulfate <sup>[3]</sup> (mg/L): Hardness greater than 500 mg/L  And  Chloride (mg/L) greater than or equal to 5 mg/L but less than 25 mg/L	Not to Exceed	No criterion	$[57.478 + (5.79 * 500) + (54.163 * \text{chloride})] * 0.65$	Indiana
Sulfate <sup>[3]</sup> (mg/L): Hardness greater than 500 mg/L  And  Chloride (mg/L) greater than or equal to 25 mg/L but less than or equal to 500 mg/L	Not to Exceed	No criterion	$[1.276 + (5.508 * 500) - (1.457 * \text{chloride})] * 0.65$	Indiana

<sup>[1]</sup> This criterion is expressed in ORSANCO's Pollution Control Standards the criterion is expressed as "Not to Exceed" and in Indiana's WQS as a 4-day average.

<sup>[2]</sup> Indiana's criterion for chloride is a calculated criterion which requires both hardness and sulfate values and is rounded to nearest whole number for the purposes of assessment. ORSANCO's Pollution Control Standards do not contain a chloride criterion for the protection of aquatic life. Therefore, IDEM uses the data collected by ORSANCO for the purposes of making its aquatic life use assessments for the Ohio River.

<sup>[3]</sup> Indiana's criterion for sulfate is a calculated criterion which requires both hardness and chloride values and is rounded to nearest whole number for the purposes of assessment. ORSANCO's Pollution Control Standards do not contain a sulfate criterion for the protection of aquatic life. Therefore, IDEM uses the data collected by ORSANCO to calculate the applicable criteria for the purposes of making its aquatic life use assessments for the Ohio River.

Table A-5: Comparison of ammonia, dissolved oxygen, pH and temperature criteria used to determine aquatic life use support.

Indicator	Type of Criteria	ORSANCO's ALUS Criteria	Indiana's ALUS Criteria	Most Stringent Criteria
Ammonia (mg/L) applicable March 1 to October 31	Not to Exceed	$[((0.0577/(1+10(7.688-pH)))+(2.487/(1-10(pH-7.688))))]*$ Minimum of (2.85 or $(1.45*100.028*(25-T))$ ) Where: T = Temperature in °C Notes: For the above equation, multiply the parenthetical equation by 2.85 when T is less than or equal to 14.51°C When T is greater than 14.51°C, multiply the parenthetical equation by $(1.45 * 10(0.028*(25-T)))$	$[((0.0577/(1+10(7.688-pH)))+(2.487/(1-10(pH-7.688))))]*$ $(1.45*100.028*(25 - (Maximum [T OR 7])))$ Where: T = Temperature in °C Notes: For the above equation, the last term should be $10(0.028*(25-T))$ for all T greater than 7°C When T is equal to or less than 7°C or less, the last term in the equation should be $10(0.028*(25-7))$ or $10(0.504)$	Equally stringent
Ammonia (mg/L) applicable November 1 to last day of February	Not to Exceed	$[((0.0577/(1+10(7.688-pH)))+(2.487/(1-10(pH-7.688))))]*$ $(1.45*100.028 * (25-(Maximum [T OR 7])))$ Where: T = Temperature in °C Notes: For the above equation, the last term should be $10(0.028*(25-T))$ for all T greater than 7°C When T is equal or less than 7°C, the last term in the equation should be $10(0.028*(25-7))$ or $10(0.504)$	Same criteria year round	Equally stringent
Dissolved Oxygen (mg/L) applicable April 15 to June 15	Not to Exceed	Minimum concentration 5.0 at all times	Average concentration at least 5.0 per calendar day and a minimum concentration of 4 at all times	ORSANCO
Dissolved Oxygen (mg/L) applicable June 16 to April 14	Not to Exceed	Average concentration at least 5.0 per calendar day and a minimum concentration of 4 at all times	Average concentration at least 5.0 per calendar day and a minimum concentration of 4 at all times	Equally stringent
pH (standard units)	Not to Exceed	No value less than 6.0 nor greater than 9.0	No value less than 6.0 nor greater than 9.0	Equally stringent
Temperature (expressed in °C and °F)	Not to exceed	Allowable values expressed as Period Averages and Maximum Temperatures	Allowable values expressed as Maximum Temperatures	ORSANCO <sup>[4]</sup>

<sup>[4]</sup> Both ORSANCO's Pollution Control Standards and Indiana's WQS articulate maximum allowable temperatures. ORSANCO's standards also include allowable period average temperatures, which are more stringent than the maximum allowable temperatures in either set of standards.

Table A-6: Comparison of human health criteria used to determine public water supply use.

Parameter	ORSANCO's Criterion Concentration	Indiana's Criterion Concentration	Most Stringent Criteria
Arsenic (Total)	10 ug/L	0.175 ug/L	Indiana
Barium (Total)	1,000 ug/L	1,000 ug/L	Equally stringent
Copper (Total)	1300 ug/L	No criterion	ORSANCO
Nickel (Total)	610 ug/L	100 ug/L	Indiana
Selenium (Total)	170 ug/L	10 ug/L	Indiana
Silver (Total)	50 ug/L	50 ug/L	Equally stringent
Thallium (Total)	0.24 ug/L	48 ug/L	ORSANCO
Zinc (Total)	7400 ug/L	No criterion	ORSANCO
Cyanide (Total)	140 ug/L	200 ug/L	ORSANCO
Fluoride	1.0 mg/L	1.0 mg/L <sup>[1]</sup>	Equally stringent
Nitrogen (as Nitrate-Nitrite)	10 mg/L	10 mg/L	Equally stringent
Nitrite	1 mg/L	1 mg/L	Equally stringent
Sulfate	250 mg/L <sup>[2]</sup>	250 mg/L	Equally stringent
Phenolics	0.005 mg/L <sup>[2]</sup>	No criterion	ORSANCO
Fecal Coliform	May not exceed 2,000 cfu/100 mL as a geometric mean calculated from five samples collected over a one-month period	May not exceed: 5,000 cfu/100 mL as a monthly average value  Or 5,000 cfu/100 mL in greater than 20% of samples collected in a given month  Or 20,000 cfu/100 mL in less than 5% of all samples collected in a given month	ORSANCO

[1] This criterion is applicable to all waters outside the mixing zone and to all designated uses.

[2] This criterion is not a human health criterion. Rather, it is identified as a taste and odor protection criterion as defined in Section 2.2 of ORSANCO's PCS.

## CALM Attachment 2

### Derivation of Criteria Values for Concentrations of Mercury and PCBs in Fish Tissue

U.S. EPA stipulates that the risk assessment parameters used to categorize fish tissue contaminant data must be at least as protective as those used in the WQS-based fish concentrations. The equation for calculating a fish tissue criterion for PCBs utilizes the guidance provided by U.S. EPA for calculating screening values for target analytes (<http://www.epa.gov/waterscience/fishadvice/volume1/v1ch5.pdf>). U.S. EPA's Office of Water recommends the use of this calculation method because it is the basis for developing current water quality criteria for the protection of human health. The general equation used for calculating Screening Values (SVs) for carcinogens in fish tissue is derived from this guidance and is as follows:

$$SVc = [(RL/CSF) * BW] / CR \quad \text{Equation B-1}$$

where:

SVc = Screening value for a carcinogen (mg/kg; ppm)

RL = Maximum acceptable risk level (dimensionless)

CSF = Oral cancer slope factor (mg/kg-d)-1

BW = Mean body weight of the general population (kg)

CR = Mean daily consumption rate of species of interest (kg/d)

In determining a screening value or fish tissue criterion for PCBs, the same assumptions and parameters used for calculating human health water quality criteria were applied. These parameters include a BW of 70 kg, CSF (of 2.0 (mg/kg-d)-1, RL of 10-5, and CR of 17.5 (g/d).

The general equation for calculating a fish tissue screening value for PCBs is:

$$\text{Fish Tissue Screening Value (mg/kg)} = \frac{\left[ \frac{\text{Cancer Risk Level}}{q1 * (mg / kg / d)^{-1}} \right] \times \text{Body Weight (kg)}}{\text{Fish Consumption (kg / d)}} \quad \text{Equation B-2}$$

Therefore,

Cancer risk level (the RL value from equation 1) = 10-5

q1 (the CSF from equation 1) = of 2.0 (mg/kg-d)-1

BW (same in both equations) = 70 kg

Fish Consumption (CR in equation 1) = 17.5 (g/d) or 0.0175 (kg/d)

$$\text{PCB Fish Tissue Screening Value (mg/kg)} = \frac{\left[ \frac{1E - 05}{2.0 (mg / kg / d)^{-1}} \right] \times 70 (kg)}{0.0175 (kg / d)} = 0.02 (mg / kg)$$

A tissue-based criterion eliminates the need for a bioaccumulation factor in the criterion calculation while PCB exposure from drinking water is negligible (<http://www.great-lakes.net/humanhealth/lake/superior.html>).

## CALM Attachment 3

### Draft Assessment Methodology for the Assessment of Waters Designated for Public Water-Supply

Unlike most other designated uses, which apply to all waters of the state, the public water-supply use is very narrowly defined in Indiana's water quality standards (WQS). The water quality criteria specific to public water supply (PWS) were established to protect the surface water quality at the intake – the point at which the water is withdrawn for treatment.

IDE�'s previous and current methodology designates any waterbody with an active<sup>15</sup> surface water intake as a source water for the purposes of making CWA 305(b) assessments and 303(d) listing decisions. However, the revision to the methodology expands the definition of a source water to include surface waters with intakes for emergency water supplies and those waters that have been determined to have a direct influence on a PWS well. Although intakes for emergency water supplies are not regularly used for source water, they may be placed into service if needed and thus should carry the same designation as other source waters.

IDE� has also identified five PWS systems that are under the direct influence of surface waters. Although some mitigation may occur through infiltration of the surface water through the soil layer, IDE� has chosen to designate these waters as source waters based on their potential ability to carry any contaminants into the PWS. If and when IDE� identifies additional surface waters with the potential to directly influence a PWS well, they will be designated for the PWS use and assessed in the manner described in this methodology.

#### *Changes to Indiana's Reach Index to Support Water Quality Assessments of Waters Designated for PWS*

Many of the waters currently designated as source waters for PWS and those to be newly designated as such will need to be reindexed to support the new water quality assessment methods described in this document. This is because Indiana's Reach Index, which allows mapping of Indiana's streams as linear features and its lakes as polygons, does not allow for the mapping of individual points. As presently indexed, any waterbody with a surface water intake is designated as a source water for PWS regardless of its size, leading to over-extrapolation of data during the assessment process.

In order to determine source water quality at the intake, IDE� must define new, smaller assessment units. Any stream on which an intake is located will be reindexed. IDE� will not reindex inland lakes or Lake Michigan but will reindex the Lake Michigan shoreline in order to apply its revised assessment methodology.

#### Inland Lakes and Streams

For inland lakes and streams, IDE�'s methods for defining assessment units for PWS are based on the approach described in Indiana's Source Water Assessment Plan (SWAP) for developing source water assessments (SWAs), required under the federal Safe Drinking Water Act (SDWA), for PWSs that rely on surface water as part or all of their supply. This approach

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<sup>15</sup> "Active" intakes are those that are currently in use. "Inactive" intakes are those that were previously in service but taken offline by the treatment facility and which are unlikely to ever be re-activated.

includes an evaluation of susceptibility, which is the potential for a PWS intake to draw in surface water with contaminant concentrations that would cause concern for water-utility operators or the consumer (IDEM, 2000).

According to the SWAP, susceptibility may be represented as a series of “zones” for the purposes of developing contingency plans and to prepare for emergency response. The zones in which contamination has the potential to create a water-supply emergency or have otherwise adverse effects within a matter of hours or days are those in close proximity to the intake.

While these zones are not intended to support water quality assessments for the purposes of CWA 305(b) assessments, their use for assessments is in keeping with the water quality criteria in Indiana’s WQS, which were “established to protect the surface water quality at the point at which water is withdrawn for treatment for public supply.”

Inland lakes and reservoirs are treated as individual assessment units for the purposes of PWS assessments, regardless of where in the waterbody the intake is located. This is consistent with Indiana’s SWAP, in which susceptibility zones are defined around the entire perimeter of the lake. This approach assumes that contaminants introduced anywhere in the lake have the potential to impact the quality of the water withdrawn at the intake, and therefore provides a representative unit of assessment for the purposes of determining designated use support.

For all streams, including the Ohio River, IDEM has defined assessment units (AUs) for each intake based on the “Emergency Management Zone”, which begins at the point of surface water withdrawal at the intake to 1,000 feet upstream. The AUs in the Indiana Reach Index on which surface water intakes are located are currently much larger than 1,000 feet and will need to be reindexed to accommodate these more narrowly- applied assessments.

### Lake Michigan

IDEM’s PWS use assessments for Lake Michigan will apply only to the areas in which source waters are withdrawn within Indiana’s state boundary. For the purposes of determining support of PWS use in Lake Michigan, IDEM has defined its AUs based on the “Immediate Nearshore Area” (INA) as defined in Indiana’s SWAP. The INA is all the land within 1,000 feet of the shoreline, extending 0.5 mile on either side of where the intake pipe intersects the shoreline area. This is the area that has the greatest potential for contaminants coming from the shoreline to have adverse effects on the PWS within a matter of hours or days.

The lateral distance of each AU will be limited to the INA. The distance out into the lake will extend to the Indiana border, which lies entirely within the nearshore waters of Lake Michigan<sup>16</sup>.

### Surface Waters with a Direct Influence on a PWS Well

To date, IDEM has identified five PWS systems using ground water as their primary source of drinking water with one or more wells that have been determined to be under the direct influence of surface water. All of these systems are community PWS systems, which are public

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<sup>16</sup> In its Great Lakes Monitoring and Research Strategy, U.S. EPA defines the boundary between offshore and nearshore areas as the depth contour equal to the mean depth of the lake. The nearshore area consists of water adjacent to the shoreline and no more than 85 meters in depth. Based on the delineation provided in the strategy, the entire Indiana portion of Lake Michigan lies within the nearshore area (U.S. EPA, 1992).

water systems that provide water for human consumption to at least 15 service connections used by year-round residents, or which regularly serve at least 25 year-round residents (e.g. municipalities, subdivisions, and mobile home parks). IDEM expects to identify additional public water systems in the future that are under the direct influence of surface water which, in addition to community water systems, could include other systems such as non-transient non-community water systems. Non-transient, non-community water systems are public water systems that serve at least 25 of the same people more than six months per year (e.g., schools, factories, industrial parks, office buildings).

For any public water system well under the direct influence of surface waters, it is possible that pollutants in surface waters located within the well field can reach the well through infiltration, through absorption into the soil, or through conduits such as field tiles or water distribution piping that intercepts sandy soils. Specific sources of contaminants vary based on location but can include agricultural chemicals and nonpoint source runoff from roads and highways.

The geographic extent of surface water influence has been modeled in the Wellhead Protection Plans for those community PWS systems with areas known to be susceptible to surface water. For the purposes of use support assessments, any surface water within the modeled area of influence will be designated as a PWS.

Non-transient, non-community public water systems are not required to complete a Wellhead Protection Plan. IDEM has provided each non-transient, non-community public water system well found to be under the direct influence of surface water Source Water Assessment specific to their drinking water well location(s) and which define a 3,000-foot radius of concern around the well. For the purposes of use support assessments, any surface water within the 3,000-foot radius of concern will be designated as a PWS.

#### *Water Quality Indicators for Determining Support of PWS Use*

Indicators used in the assessment of drinking water use support include the following:

- Any substances for which numeric criteria for human health apply at the point of water intake that have been identified in Tables 6-1 and 8-3 of Indiana's Water Quality Standards.<sup>17</sup>
- Any substances for which numeric criteria are defined specifically for the PWS use<sup>18</sup> with the exception of total coliform bacteria for which Level 1 and Level 2 Assessments under the federal SDWA Revised Total Coliform Rule (RTCR) are used.
- The cyanobacterial toxins Cylindrospermopsin and Microcystin-LR for which U.S. EPA has issued drinking water health advisory values.

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<sup>17</sup> The criteria identified in Table 6-1 are applicable to waters outside the Great Lakes basin and can be found in 327 IAC 2-1-6. The criteria identified in Table 8-3 apply to waters located within the Great Lakes basin and can be found in 327 IAC 2-1-5-8.

<sup>18</sup> For all waters in the Great lakes basin, these substances and criteria are defined in 327 IAC 2-1-5-8(f). For all other Indiana waters, these substances and criteria are defined in 327 IAC 2-1-6(e).

## *Water Quality Criteria and Other Benchmarks for Determining Support of PWS Use*

### Human Health Criteria Applicable at the Point of Intake and Other Water Quality Criteria Specific to the PWS Use

Indiana's WQS contain human health criteria for several substances applicable at the point of intake in order to protect the public from negative health effects that could occur if they are found in high concentrations in source waters.

For waters in the Great Lakes basin, IDEM will apply the most stringent of the Human Non-cancer Criterion (HNC), or the Human Cancer Criterion (HCC) defined for drinking water in Table 8-3 of Indiana's WQS.

For waters outside the Great Lakes basin, IDEM will apply the continuous criterion concentration (CCC) values shown in Table 6-1 of Indiana's WQS at the point of water intake, which represents the most stringent human health criterion for a given substance and is thus the most protective of the PWS use.

Indiana's WQS contain numeric criteria specifically for waters designated as source waters for PWS, which, like human health criteria, are applicable at the point of intake<sup>19</sup>. The WQS also include the following criteria to prevent taste and odor issues and to protect human health:

- Chloride~~–~~ (250 mg/l)
- Sulfate~~–~~ (250 mg/l)
- Dissolved solids~~–~~ (750 mg/l) (or 1,200 micromhos specific conductance as a surrogate)
- Nitrite~~–~~ (1 mg/l)
- Nitrogen, measured as the sum of nitrate and nitrite~~–~~ (10 mg/l)

The criteria for chloride, sulfate, and dissolved solids are intended to prevent taste and odor issues. The criteria for nitrite and nitrogen are intended to protect human health.

IDEML will apply these criteria to data sets meeting the minimum data requirements identified in Table 2 and which were collected from waters designated for PWS in accordance with this methodology.

Indiana's WQS also contain numeric criteria for total coliform bacteria for waters designated as source waters for PWS and which are also applicable at the point of intake<sup>20</sup>. However, because exceedances of these criteria in source waters do not prohibit or otherwise limit the use of those waters for PWS, IDEM instead bases its assessment methodology for bacteria in source waters on the federal SDWA RTCR. The RTCR went into effect in Indiana on April 1, 2016, replacing the Total Coliform Rule which had been in effect since 1989. Under the previous rule, there was no systematic way to determine when MCL violations for bacteria were attributable to source water issues, whereas the RTCR does. Because the RTCR provides a means of identifying PWSs adversely impacted by bacterial contamination in source waters, it provides greater opportunities for their protection through IDEM's CWA programs.

The RTCR is intended primarily to protect the integrity of the drinking water distribution

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<sup>19</sup> For waters in the Great lakes basin, these substances and criteria are defined in 327 IAC 2-1.5-8(f). For all other Indiana waters, these substances and criteria are defined in 327 IAC 2-1-6(e).

<sup>20</sup> See footnote 1.

system. However, the Level 1 and Level 2 Assessments, which are required in cases where bacteria are detected in treated water, requires an examination of source waters in addition to the investigation of other factors<sup>21</sup>. Therefore, the results of Level 1 and 2 assessments conducted under the RTCR will reveal those situations in which MCL violations for bacteria are attributable to source water contamination, as opposed to issues within the plant and/or its distribution system.

Although all PWS are required to sample for bacteria, bacterial contamination in source water is primarily a concern for facilities that draw their supplies from surface water, which is vulnerable to far more sources of fecal contamination than ground water. PWS wells under the direct influence of surface water are also somewhat vulnerable to bacterial contamination. However, bacteria can be effectively removed with conventional PWS treatment; specifically, the disinfection portion of the treatment process, which is required for all surface water systems. Therefore, it is rarely the case that MCL violations for bacteria in treated water are the result of excessive bacterial concentrations in source water<sup>22</sup>.

By using RTCR assessment results instead of applying a numeric criterion, IDEM's PWS methodology balances the possibility that bacterial contamination in a source water might impair its designated use (i.e. prohibit or otherwise limit its use for PWS) with the greater likelihood that MCL violations for bacteria (indicators of potential impairment) are attributable solely to issues within the plant or its distribution system, or both. Using the RTCR ensures that IDEM's assessments will achieve the following:

- Identify those rare cases in which bacterial contamination in source water is limiting or prohibiting the use of an otherwise treatable supply or driving a need for additional types of treatment above and beyond conventional methods.
- Do not assess as impaired source waters based on MCL violations attributable to problems within the facility or its distribution system, or both – issues for which other regulatory means already exist to remedy under the SDWA.

#### Benchmarks Used to Assess for Cyanobacterial Toxins

Algae are a common component of aquatic ecosystems, and are commonly found in Indiana lakes and streams. However, the concentrated presence of blue-green algae (cyanobacteria) can be linked to some adverse health effects and as a result, cyanobacterial toxins are a growing concern for drinking water facilities. It should be noted here that not all blue-green algal blooms produce toxins, and the specific conditions that lead to cyanobacterial toxin production are not well understood in the scientific community.

The SDWA requires water treatment facilities to notify the public when they detect a health risk in treated drinking water supplies. IDEM considers any consumption and use notification issued by a water treatment facility based on cyanobacterial toxin concentrations in treated drinking water to be indicative of source water impairment.

Currently, there are no U.S. Federal water quality numeric criteria or regulations for cyanobacteria or cyanobacterial toxins in drinking water under the SDWA, or for ambient waters

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<sup>21</sup> See <http://in.gov/idem/cleanwater/2494.htm> for more detailed information regarding Level 1 and Level 2 Assessments under the RTCR.

<sup>22</sup> Personal communication with Stacy Jones, Technical Environmental Specialist for IDEM OWQ's Drinking Water Branch (January 15, 2016).

under the CWA. Indiana's WQS likewise contain no numeric criteria for these substances. However, they do contain narrative criteria intended to protect surface water quality, including those waters designated as a PWS. These criteria state that all Indiana surface waters shall be "free from substances in concentrations that on the basis of available scientific data are believed to be sufficient to injure, be chronically toxic to, or be carcinogenic, mutagenic or teratogenic to humans..."<sup>23</sup>

In the absence of state or federal numeric criteria for cyanobacteria or cyanobacterial toxins, IDEM considers the following benchmarks provided in U.S. EPA's drinking water 10-day health advisories defensible for use in assessments based on Indiana's narrative water quality criteria:

- Cylindrospermopsin concentrations greater than 3.0 micrograms per liter.
- Total microcystin concentrations greater than 1.6 micrograms per liter (using microcystin-LR, one of the most potent forms of the toxin, as a surrogate).

Cyanobacterial blooms are seasonal in nature with most occurring in late summer. However, high concentrations of cyanobacterial toxins have been found to occur even in colder months. Therefore, IDEM applies these benchmarks to data collected any time of the year. The occurrence of cyanobacterial toxins in treated drinking water depends on their levels in the raw source water, and the effectiveness of treatment methods for removing cyanobacteria and cyanobacterial toxins during the treatment process.

U.S. EPA's Health Advisory values were developed to protect the public from exposure to cyanobacterial toxins in treated drinking water, not source waters. Given this, using these values as benchmarks for the assessment of untreated source waters is conservative in nature, and based on the idea that if source waters meet these benchmarks, drinking water treatment plants can be reasonably confident that their treatment processes will result in concentrations that are below those that might result in adverse health effects.

However, IDEM's CWA 305(b) and 303(d) assessment and listing processes should not be construed as a public health advisory because they do not reflect conditions in real time. U.S. EPA's health advisories for cyanobacterial toxins are intended to guide treatment decisions when the risk of cyanobacterial toxin contamination is high.

It is important to emphasize that the public cannot assume that because a particular waterbody appears on the 303(d) list for a cyanobacterial toxin impairment, the treated water they draw from the tap is in any way unsafe to drink. The 303(d) list identifies waterbodies that are not fully supporting their designated uses, but is not intended to provide the public with information regarding the quality of the treated drinking water they get from PWSs.

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<sup>23</sup> 327 IAC 2-1-6 (a)(2) and 327 IAC 2-1.5-8(b)(2).

While mindful of the differences in purpose and function of U.S. EPA's health advisories and CWA requirements to determine the degree to which our surface water resources are supporting their use as a PWS, IDEM believes that applying U.S. EPA's Health Advisory numbers as benchmarks provides for greater protection of source waters. Many of the same practices that can help to control taste and odor issues, which are often driven by nutrient enrichment, can also help to reduce the occurrence of algal blooms in surface waters. Where sufficient data are available, applying these benchmarks will help to identify those source waters that are more susceptible to cyanobacterial toxins and prioritize them for further evaluation for CWA Sections 303(d) and 305(b) purposes.

#### *Minimum Data Requirements for Assessment*

The PWS use is unlike other designated uses in that it is very narrowly defined in Indiana's WQS. Given the limited size of the AUs defined and designated for PWS, it is unlikely that IDEM will find a significant amount of existing data in its own database to use for assessments with this methodology.

It is anticipated that in the short-term, assessments in accordance with this methodology will rely almost entirely on water quality data collected by PWS facilities. Most of the data that facilities collect are compliance data, which come from the analysis of "finished" or treated water, not untreated source water. There is no requirement under the SDWA for facilities to monitor their intake water, and currently few PWS facilities collect raw water quality data at their intakes. However, through the implementation of its External Data Framework, IDEM hopes to build collaborative partnerships with drinking water facilities and other interested parties to collect the high quality data needed to support assessments going forward. IDEM will also explore the feasibility of expanding its own monitoring program to provide water quality data for assessment and continues to seek additional sources of existing data at or near surface water intakes.

All available water quality data meeting IDEM's data quality requirements, whether collected by IDEM or external parties, will be used for assessment. U.S. EPA guidance suggests that, while all readily available data should be reviewed, 305(b) assessment decisions should be based on data five years old or less. For bacteria, all Level 1 and Level 2 Assessments performed in accordance with the RTCR within the most recent five consecutive years will be considered valid for the purposes of designated use assessments of PWS.

Table 15 provides minimum data requirements for assessments of PWS use support, along with any corresponding requirements regarding timing and frequency of data collection activities.

Table 15: Minimum data requirements for the CWA 305(b) assessments of PWS use support.

Parameter Type	Minimum Information Required for Assessment	Index Period
<b>Drinking Water Use Support – All Waters</b>		
Chemical Toxicants	Minimum of three measurements collected within the same year at least one month apart	Most recent five consecutive years
Cyanobacterial Toxins	Minimum of one measurement  Or  One consumption and use notification issued by a water treatment facility based on cyanobacterial toxin concentrations in treated drinking water	Most recent five consecutive years
Conventional Inorganics	Minimum of three measurements collected within the same year at least one month apart	Most recent five consecutive years
Bacteria	All Level 1 and/or Level 2 assessments performed in accordance with the RTCR	Most recent five consecutive years

For each AU with sufficient data to make one or more designated use assessments, IDEM applies the 305(b) assessment process described in Table 2. The specific criteria or benchmarks to be applied to the data will depend, in some cases, on the location of the waterbody from which they were collected. Assessment data are integrated for the purposes of making water quality assessments, meaning that all data for a given waterbody are considered together, and each type of data are treated as independently applicable.

Table 16: Water quality assessment methodology for determining PWS use support.

<b>Drinking Water Use Support – All Waters</b>
The following waters are designated for PWS:
<ul style="list-style-type: none"> <li>• Streams with active PWS intakes (including the Ohio River)</li> <li>• Streams with emergency water-supply intakes that draw from reservoirs</li> <li>• Inland Lakes with active PWS intakes or intakes for emergency water-supplies</li> <li>• Certain sections of the Lake Michigan shoreline</li> <li>• Surface waters with a direct influence on a PWS well</li> </ul>

When IDEM has data for a waterbody designated for PWS, those data will be compared to the applicable water quality criteria in Indiana's WQS and other benchmarks identified in this methodology to determine if the drinking water use is supported.

### Drinking Water Use Support – All Waters

Drinking Water Use Support – All Waters		
<p>Total metals, total cyanide, pesticides, polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and other organic contaminants were evaluated on a site by site basis and judged according to magnitude of the exceedance(s) of Indiana's WQS for point of water intake and the number of times exceedance(s) occurred. For any one pollutant (grab or composite samples), the following assessment criteria are applied. "Raw" water is untreated surface water collected from the waterbody of interest.</p>		
<p><b>Chemical Toxicants</b></p>	<p><b>Fully Supporting</b></p> <p>For waters in the Great Lakes basin: Not more than one exceedance in raw water of the human noncancer criterion (HNC) or the human cancer criterion (HCC), whichever is more stringent, within a three-year period</p> <p>For downstate waters: Not more than one exceedance in raw water of the continuous criterion concentration (CCC) at the point of water intake within a three year period</p>	<p><b>Not Supporting</b></p> <p>For waters in the Great Lakes basin: More than one exceedance in raw water of the human noncancer criterion (HNC) or the human cancer criterion (HCC), whichever is more stringent, within a three -year period</p> <p>For downstate waters: More than one exceedance in raw water of the continuous criterion concentration (CCC) at the point of water intake within a three -year period</p>
	<p><b>Fully Supporting</b></p> <p>Not more than one exceedance in raw water of 3.0 micrograms per liter for Cylindrospermopsin or 1.6 micrograms per liter of total microcystin (using microcystin-LR as a surrogate) at the point of water intake within a three -year period</p> <p>And</p> <p>No more than one consumption and use notification issued by a water treatment facility during the five -year index period for the assessment based on cyanobacterial toxin concentrations</p>	<p><b>Not Supporting</b></p> <p>More than one exceedance in raw water of 3.0 micrograms per liter for Cylindrospermopsin or 1.6 micrograms per liter of total microcystin (using microcystin-LR as a surrogate) at the point of water intake within a three-year period</p> <p>Or</p> <p>More than one consumption and use notification issued by a water treatment facility during the five-year index period for the assessment based on cyanobacterial toxin concentrations</p>
<p><b>Conventional Inorganics</b></p>	<p>Dissolved solids (or specific conductance as a surrogate), sulfate, chloride, nitrite-N and nitrogen (measured as NO<sub>3</sub> + NO<sub>2</sub>) were evaluated for the exceedance(s) of Indiana's WQS for point of water intake and the number of times the exceedance(s) occurred. For any single pollutant (grab or composite samples), the following assessment criteria are applied to data sets consisting of three or more measurements. "Raw" water is untreated surface water collected from the waterbody of interest.</p>	
	<p><b>Fully Supporting</b></p> <p>Not more than 10% of sample results exceed the applicable criteria or benchmark in raw water</p>	<p><b>Not Supporting</b></p> <p>More than 10% of sample results exceed the applicable criteria or benchmark in raw water</p>
<p><b>Bacteria</b></p>	<p><b>Fully Supporting</b></p> <p>No Level 1 or Level 2 assessment conducted in accordance with the RTCR indicating bacteria violations wholly or partly attributable to source water</p>	<p><b>Not Supporting</b></p> <p>One or more Level 1 or Level 2 assessments conducted in accordance with the RTCR indicating bacteria violations wholly or partly attributable to source water</p>

## References

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