

1. The attached excel file (IN2020IR-PN-Draft-Data\_EPA-Comments.xlsx) includes tabs with questions/comments (Refer to the **EPA Comment** column in the excel file) on a series of specific AU\_IDs and/or parameters based on information provided in ATTAINS. Please provide clarifications or explanations regarding these specific AU\_IDs and/or parameters.

*IDEM Response: Appendix K2 of IDEM's 2020 Integrated Report submittal is a spreadsheet file which contains IDEM's responses to U.S. EPA comments regarding the specific AUIDs and parameters in question.*

2. Below are some comments on Indiana's 2020 Consolidated Assessment and Listing Methodology (CALM) (Appendix 1).

- a. Page 13, bullet point on the page identifies Cyanobacteria monitoring of 10-12 lakes. Are these in the same rotating basins as the streams? I assume they are not the same lakes each year/listing cycle. This should be clarified.

*IDEM Response: In contrast to IDEM's rotating basin monitoring strategy for streams, IDEM's cyanobacteria monitoring for lakes is targeted in nature and focuses on swimming areas of selected lakes at some state parks and state recreation areas. This has been clarified in the CALM.*

- b. Page 16, first paragraph discusses the CLP. Does the Indiana University also monitor for cyanobacteria?

*IDEM Response: The Indiana Clean Lakes Program does not routinely monitor for cyanobacteria. However, IDEM's Nonpoint Source Program provided funding for a monitoring project which resulted in the 2005 report entitled, [Distribution and Abundance of \*Cylindrospermopsis raciborskii\* in Indiana Lakes and Reservoirs](#).*

- c. Page 67, foot note 6 (used in page 20) and foot note 8 (used in Table 3) included the following: "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." Even though ORSANCO does not list for DO, does IDEM use this data to make a listing determination on segments of the Ohio River? This is readily available data and IDEM has a listing methodology for DO in other parts of the state. Note lack of a listing method is not a rational for not using data. This issue also applies to temperature readings on the Ohio River.

*IDEM Response: As Indiana is a member state of the Compact, IDEM actively participates in ORSANCO's decision-making processes regarding its monitoring strategy and biennial water quality assessments. Thus, those assessments that IDEM incorporates into its 303(d) list and the data upon which they are based have been reviewed by IDEM and are considered to be appropriate for use in the development of Indiana's 303(d) list.*

- d. Page 23, Table 4. For Dioxin, the fully support and not support are identical. Should fully supporting read "Less than or equal to"?

*IDEM Response: This is a typographical error that has been corrected in the CALM submitted with IDEM's 2020 Integrated Report (Appendix G).*

3. EPA determined on its final action on IDEM's 2010 303(d) List that it was appropriate to use total metals data and derived criteria for making WQS attainment determinations and 303(d) listing decisions for Indiana waters. Pending further discussion with the State, EPA took no action on Indiana's 2012, 2014, 2016, and 2018 Section 303(d) lists with respect to the metals issue. EPA is continuing to consider this issue with regards to the 2020 List.

*IDEM Response: IDEM maintains that it has already provided U.S. EPA good cause for the waters delisted and those not previously listed that U.S. EPA wishes to add to Indiana's 303(d) list. IDEM remains open to discussion with EPA as they continue to consider this issue.*