Stakeholder Input on New/Revised Criteria

February 20, 2008
Washington, DC

"What would you like the new/revised criteria to do for you?"

Initial responses from:

- Alliance for the Great Lakes
- Limnotech
- Kansas Dept of Health and Environment
- National Resources Defense Council
- New England Interstate Water Pollution Control Commission
- Washington State Dept of Ecology

Summary of Initial Input

EPA should:
- Incorporate Airlie workshop recommendations
- Develop a standardized monitoring protocol for all States that accounts for factors that can have a significant impact on results.
- Strive to develop new methods that cost the same or less than current methods.
- Allow for different criteria/indicators/methods for different types of waters (high v. low density use).

Initial Input (cont.)

EPA should:

- Address how States should handle water body and source conditions different from those used to develop the criteria:
  - Is a swimming area on a large river downstream of an urban area to be treated differently than a swimming area on a lake?
  - What tool works best for what combination of conditions?
  - How should intermittent discharges factor into establishing appropriate risk levels?

Initial Input (cont.)

EPA should:

- Consider whether epi-based criteria are appropriate in waters not used for swimming:
  - Have a separate *general sanitation* criterion for all waters not identified as *bathing waters*
- Better frame the entire risk spectrum for water recreation and provide perspective as to how GI risk relates to other water recreation risks.
- In implementation guidance, clearly define primary contact.
- Specify secondary contact criteria?

Initial Input (cont.)

EPA should:
- Expand the BEACH Act to inland waters
- Provide guidance/criteria to protect relatively undeveloped recreational areas
- Spur development of guidance on algal-derived toxins, particularly from acute exposure during recreational activities
- Address how to eliminate beach pollution sources

Initial Input (cont.)

Criteria should:
- Be protective of public health, including children
- Work across multiple water programs (NPDES, TMDL, NPS)
- Utilize more accurate indicators that are supported by data linking them to public health impacts
- Not include single sample maxima (unless supported by data that ties SSM to illness)
- Be directly understandable to the public
- Define important terms

Initial Input (cont.)

Criteria should:

- Allow for the environmentally unique characteristics of pathogens when applied for assessment purposes:
    - Make allowances for "predictable short-term pollution or abnormal situations" such as high runoff or sewer overflows.
    - Create a long-term picture of the water quality that eliminates the undue influence of "spikes" caused by short-term pollution.
    - Allow for a broader criteria range when human contamination can be ruled out via a sanitary survey after the fact.

Initial Input (cont.)

Criteria should:

- Address how and when public notification programs should be implemented
- Address other factors that impair beach use

Prior Stakeholder Input

- Include value(s) for short-term measures (e.g., beach advisories) and long-term assessment (e.g., determining waterbody impairment).

- Include a metric that is more understandable and more directly linked to the epi data than the Single Sample Maximum for beach advisory programs, assessment of small data sets, etc.

Prior Input (cont.)

- Include options for applying different criteria values to waters with sources of fecal contamination that science shows are less risky than human sources.

- Protect fresh and marine waters at the same risk level.

- Provide options for use of alternative indicators and analytical methods.

Key Themes

Criteria should be:
- Scientifically tied to public health impacts
- Protective of public health
- Understandable/clear/specific
- Flexible
- Cost-effective