



Division of Surface Water Response to Comments

Rule: Water Quality Standards Program Rule OAC 3745-1-07

Agency Contact for this Package

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Ohio EPA held an interested party comment period from March 13, 2015 to April 15, 2015 regarding the Water Quality Standards program recreational water criteria rule. This document summarizes the comments and questions received during the associated comment period.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

General/Overall Concerns

Comment 1: OEPA's Draft Recreational Water Quality Criteria (Rule OAC 3745-1-07) are consistent with EPA's recently revised Recreational Water Quality Criteria (RWQC) recommendations, which were published in November 2012. The RWQC reflect the latest scientific knowledge and are intended to help protect the public from exposure to pathogens while participating in water-contact activities such as swimming and wading in waters that are designated for primary contact recreation. (U.S. EPA, Region 5)

Response 1: Comment acknowledged. No revisions to the rule are necessary based upon the comment.

Comment 2: EPA recommends that water quality standards based on the RWQC include the following values: magnitude,

duration, and frequency. Consistent with the RWQC's recommended magnitude, OEPA's proposed use of both a Geometric Mean (GM) and a Statistical Threshold Value (STV) together will help determine whether the water quality is protective of primary contact recreation. Use of the GM alone would not reflect pollution spikes in water quality because the GM alone is not sensitive to them. Consistent with the RWQC's recommended duration, OEPA's replacement of the seasonal GM with a 30-day GM will produce a more accurate picture of the water quality for that time period, allowing for improved notification time about water quality to the public. OEPA is retaining its frequency of excursion, requiring that criteria shall not be exceeded in more than ten percent of the samples taken during any thirty-day period, which is consistent with the RWQC. (U.S. EPA, Region 5)

Response 2: Comment acknowledged. No revisions to the rule are necessary based upon the comment.

Comment 3: OEPA proposes to use a Beach Action Value (BAV) of 235 E. coli colony-forming units per 100 ml as a "do not exceed value" for issuing beach and bathing water advisories. While not a component of the RWQC, use of this BAV, which is consistent with EPA's revised National Beach Guidance and Required Performance Criteria for Grants, is intended to help protect the health of beachgoers at Ohio's recreational waters by advising the public of the potential risks associated with primary contact recreation in waters that exceed the BAV. (U.S. EPA, Region 5)

Response 3: Comment acknowledged. No revisions to the rule are necessary based upon the comment.

End of Response to Comments