

**ATTACHMENT
E**

Response to Individual Assessment Units Listed in Tables 1 Through 5 of USEPA’s Decision Document for the Partial Approval/Partial Disapproval of Illinois’ Submission of the State’s Integrated Report with Respect to Section 303(d) of the Clean Water Act (Category 5 Waters)

Table 1. Disapproval of Delisted Dissolved Oxygen Impairment Based on New Water Quality Standard Change

ILLINOIS EPA RESPONSE: Dissolved Oxygen was correctly deleted from Illinois’s 303(d) List in all assessment units shown in Table 1 as explained below.

Assessment Unit	Explanation
IL_AJF-16*, IL_ATHG-05 IL_D-32, IL_IXF-01*, IL_IXM-04*, IL_ND-13*, IL_RNB, IL_ROR, IL_RTZG,	Dissolved oxygen was deleted as a cause of impairment for these segments because, new data showed aquatic life use is now fully supported. The change in the dissolved oxygen standard had no impact on this change in use support rating.
IL_JMAA-01 IL_LDDC, IL_OI-05	Dissolved oxygen was deleted as a cause of impairment because new data showed no violations of either the old or new dissolved oxygen standard.
IL_GL-09	Dissolved Oxygen is still shown as cause of impairment for this segment. As explained in Appendix A-4 of Illinois’s Integrated Report, dissolved oxygen was removed because <i>“Dissolved Oxygen is not a pollutant. Low dissolved oxygen is identified as a non-pollutant cause of impairment for this segment.”</i>
IL_G-39, IL_GL-10	Illinois did not remove Dissolved Oxygen for these segments in the 2008 cycle because Dissolved Oxygen was not identified as a cause of impairment for these segments in Illinois’ 2006 303(d) List. Illinois EPA has no new data indicating violations of either the old or new dissolved oxygen standard in these segments.

* These segments were removed from Illinois’ 303(d) List because new data indicated all uses are now fully supported.

Table 2. Disapproval of Delisted Total Dissolved Solids based on New Standards

ILLINOIS EPA RESPONSE: In the following assessment units from Table 2, Total Dissolved Solids was correctly deleted based on the existing water quality standard as explained below.

Assessment Unit	Explanation
IL_ATH-05, IL_DGIA-03, IL_DJE-02*, IL_DT-06, IL_DT-09, IL_ERA-01, IL_JNA-01, IL_JR-02, IL_NZM-01, IL_OT-02	Total Dissolved Solids was deleted as a cause of impairment for these segments because new data showed no violations of the old Total Dissolved Solids standard. The reason for removal in Appendix A-4 should have been: <i>"Cause deleted. WQS attained; reason for recovery unspecified."</i>
IL_BF-01 IL_BFC-10 IL_BFC-11 IL_BFC-26	The original listing of Total Dissolved Solids for these segments was based on violations of the General Use standard. However, it was later discovered that a higher site-specific standard is in effect for these segments. There were no violations of the site specific standard in these segments. The reason for removal in Appendix A-4 should have been: <i>"Cause deleted. WQS attained; Flaws in original listing."</i>

*Now assessed as Fully Supporting Aquatic Life Use.

In addition, IL_PQIB-H-C1 was incorrectly identified in U.S. EPA's Attachment 1, Table 2 as Hampshire Creek. The correct name is Huntley Ditch.

Table 3. Disapproval of Delisted Sulfate Impairments based on New Standards

ILLINOIS EPA RESPONSE: Sulfate was correctly deleted based on the existing water quality standard in the following assessment units from Table 3 as explained below.

Assessment Unit	Explanation
IL_AT-06 IL_ATH-05 IL_DJB-18 IL_DJE-02*, IL_GL-09 IL_N-99	Sulfate was deleted as a cause of impairment for these segments because new data showed no violations of the old Sulfate standard. The reason for removal in Appendix A-4 should have been: <i>"Cause deleted. WQS attained; reason for recovery unspecified."</i>

*Now assessed as Fully Supporting Aquatic Life Use.

The removal of TDS and sulfates as causes of impairment (shown in Tables 2 and 3) resulted in removing only two segments (IL_ATFF-02 and IL_DJE-02) from Illinois' 303(d) List, and one of those segments (IL_DJE-02) would have been removed irrespective of the standards change.

Table 4. Disapproval of Delisted Total Nitrogen Impairment based on Methodology Change

ILLINOIS EPA RESPONSE: In the following segments, the removal of Total Nitrogen is justified even if using the old methodology, as explained below.

Assessment Unit	Explanation
IL_BC-02 IL_DG-04 IL_DG-07 IL_EO-01 IL_EO-02 IL_HB-01 IL_JN-02 IL_MJ-01 IL_OJ-08 IL_PBD-02 IL_PW-01	New data showed attainment of the former Total Nitrogen guideline.
IL_D-32 IL_DSE-01* IL_DSH-02* IL_LDG-01* IL_JH-03* IL_ND-13*	Total Nitrogen was deleted as a cause of impairment for these segments because, new data showed aquatic life use is now fully supported. The change in the methodology for Total Nitrogen had no impact on this change in use support rating.
IL_REA	TMDL #33205 for Lake Decatur was approved by USEPA on September 6, 2007.

*These segments were removed from the list of impaired waters because all uses are now assessed as Fully Supporting.

Of the 191 waters listed in Attachment 1, Table 4, only 14 are being removed from Illinois' 303(d) List. Five of these (IL_DSE-01, IL_DSH-02, IL_LDG-01, IL_JH-03, and IL_ND-13) are being removed because new information indicates that aquatic life use and all other uses are now fully supported. Nine others (IL_ATFJ-02, IL_BPG-10, IL_BPJC-08, IL_BPKP-01, IL_BPKP-02, IL_DQG, IL_DZGB-01, IL_PB-28, and IL_TP-03) were moved to category 4C because data and information from these segments indicated no water quality standards violations were present and that aquatic life use impairment was due to pollution, not pollutants.

In addition, the following five waters listed in Table 4 are covered under Illinois' Secondary Contact and Indigenous Aquatic Life standards and are not subject to the General Use standards: IL_GI-02; IL_GI-06; IL-HAB-41; IL_HCC-08; and IL_H-01. Therefore, the delisting of Total Nitrogen from these waters is justified based on the reason given in Appendix A-4 of the Integrated Report which states "No applicable WQS; Flaws in the original listing."

Also, the segment IL_MJBA-01 is Straddle Creek, not Carroll Creek as shown in Table 4.

Table 5. Disapproval of Delisted Sedimentation Impairments based on Methodology Change

ILLINOIS EPA RESPONSE: In the following segments, the removal of siltation/sedimentation was not based on a methodology change. Sedimentation would have been deleted even if using the old methodology, because new data indicated the former guideline of $\geq 34\%$ silt/mud bottom substrate or other guidelines are attained.

Assessment Unit	Percent Silt/Mud from new data
IL_AA-01	(See note 1 below)
IL_AT-06	15%
IL_ATGC-01	4%
IL_ATH-05	1%
IL_ATHG-01	4%
IL_II-05*	33%
IL_IIB-40*	8%
IL_IXCC-01	31%
IL_IXM-04*	24%
IL_JMA-01	23%
IL_JN-01	15%
IL_JQ-07	16%
IL_JR-02	30%
IL_KCAG-01*	(See note 2 below)
IL_ND-11	10%
IL_PB-05	19%
IL_G-30	(See note 2 below)
IL_G-32	(See note 2 below)
IL_RNB	(See note 3 below)

*Now assessed as Fully Supporting Aquatic Life Use.

Note 1: The removal of sedimentation and the delisting of IL_AA-01 is justified for the following reason. The basis of the assessment for this water body was biological data collected in 1993, evaluated using the fish IBI and the Macroinvertebrate Biotic Index. However, after further review it was determined that these indices were not appropriate assessment tools for this water body. These tools were developed for evaluating flowing waters and the Old Cache River Channel is cutoff from the main river and is now a shallow water wetland. Because Illinois currently has no appropriate tools for assessing attainment of aquatic life use in this water body type, the assessment was changed to not assessed and all causes of impairment were deleted.

Note 2: Sedimentation/siltation was listed for segments IL_G-30 and IL_G-32 in the 2006 Integrated Report based on TSS exceeding a statistical guideline value of 116 mg/L. New data from these two segments for the 2008 Integrated Report indicated TSS concentrations <116 mg/L. Assessments for these two segments were limited to water quality data submitted by the Metropolitan Water Reclamation District of Greater Chicago. Habitat data were not provided.

Note 3: This water body segment is a lake. Assessment of sedimentation/siltation in lakes is not based on a percent silt/mud bottom substrate. The methodology for assessing sedimentation/siltation as a cause of aquatic life use impairment in lakes did not change from the 2006 cycle.