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APPENDIX A. NUTRIENT CRITERIA CASE STUDIES

The following five case studies are meant to capture some of the variability of stream systems located throughout the country. Although these case studies exhibit varying levels of complexity, they are meant to provide the reader with real-world examples of how criteria can be developed on a practical level and several region-specific issues that may be encountered as one works through the criteria development process. The ecoregional nutrient criteria process discussed in the Tennessee case study involves refinement of the Level III ecoregions found within the State; identification and monitoring of reference stream systems; and correlational analyses of nutrient levels, conventional water chemistry parameters, and biological indices to derive criteria. In contrast, the Clark Fork, Montana, case study delineates a process for setting target nutrient and algal levels based on a combination of modified established criteria, literature values, and observed thresholds for nuisance algal growth. The Upper Midwest river systems case study describes the results of a cooperative effort among three USGS NAWQA projects in the upper Midwest Corn Belt region that evaluated algal and macroinvertebrate response to nonpoint agricultural sources relative to naturally-occurring factors (e.g., riparian vegetation, hydrology). The Bow River, Canada, case study details the reduction of nuisance biomass (both periphyton and macrophytes) over a 16-year period through decreases in nitrogen (~50%) and phosphorus (80%) from domestic wastewater effluent. Finally, the desert stream case study discusses several of the determinants of nutrient regimes in desert streams that should be considered when developing nutrient criteria for these, as well as other, complex, highly variable stream systems.

TENNESSEE ECOREGIONAL NUTRIENT CRITERIA

In 1992, the Tennessee DWPC (Division of Water Pollution Control) faced an important decision on how water quality assessment would be done in the future. When program status was assessed, there were problems that were likely to be amplified in the future. For example:

- The "one-size-fits-all" statewide numeric criteria approach provided stability, but lacked regional flexibility. Statewide criteria were clearly overprotective in parts of the state, but arguably underprotective in other areas.
- Narrative criteria were based on a verbal description of water quality, rather than a number. Thus, they provided flexibility, but lacked an objective means of interpretation. As an example, the narrative criterion for biological integrity states "*waters shall not be modified to the extent that the diversity and/or productivity of aquatic biota within the receiving waters is substantially reduced*". However, an interpretation of the word "substantially" was not provided.
- Unlike biological integrity, nutrients did not have specific narrative criteria. Nutrients were assessed under the more generic "free from" statements found in toxicity sections of the fish and aquatic life criteria and under "aesthetic" sections of the recreational criteria. Thus, before any stream could be assessed as impacted by nutrients, the existence of a "problem" had to be established.
- Tennessee was encouraged by EPA to convert to a watershed approach for issuance of water quality permits. Without a sense of regional variability in water quality, there was a distinct disadvantage in goal setting for these watersheds. Additionally, the rigors of 303(d) listing and TMDL development required accurate interpretation of Tennessee's narrative water quality criteria. The specter of lawsuits by citizens and members of the regulated community required that assessments be defensible.

A method was needed for comparing the existing conditions found in a stream to unimpacted conditions. This reference condition varied across the state. The reference condition established should be within a similar area, to avoid "apples and oranges" comparisons. It was determined that *ecoregions* were the best geographic basis upon which to make this assessment.

An ecoregion is a relatively homogeneous area defined by similarity of climate, landform, soil, potential natural vegetation, hydrology, and other ecologically relevant variables.

The "Ecoregions of the United States" map (Level III) developed in 1986 by James Omernik of EPA's Corvallis Laboratory delineated eight ecoregions in Tennessee. The DWPC arranged for Omernik and Glenn Griffith to sub-regionalize and update state ecoregions.

The Tennessee Ecoregion Project began in 1993 and was envisioned to occur in three phases:

PHASE I: DELINEATE SUB-ECOREGION BOUNDARIES

Phase I of the project involved geographic data gathering, development of a draft sub-regionalization scheme, and ground-truthing of the draft into a final product. This product included new maps and digitized coverages for use in the DWPC GIS system. This part of the project began in 1993 and was completed in 1995. This refinement resulted in a total of 14 ecoregions for the state (Figure A-1).

PHASE II: REFERENCE STREAM SELECTION

EPA and DWPC staff identified potential reference streams. Reference streams selected were located in relatively unimpacted watersheds typical for that ecoregion (Figure A-2). When possible, watersheds within state or federally protected areas were selected.

A reference stream is a least impacted waterbody within an ecoregion that can be monitored to establish a baseline to which other waters can be compared. Reference streams are not necessarily pristine or undisturbed by humans.

Division staff visited each candidate stream. Chemical and benthic macroinvertebrate samples were used to cull the list of streams down to a final list. Three reference streams per sub-ecoregion were considered the minimum requirement.

PHASE III: INTENSIVE MONITORING OF REFERENCE STREAMS

Since August 1996, final selected reference sites have been monitored quarterly. During the first year of the project, water chemistry was monitored using grab samples collected on three consecutive days (if possible). Chemical sampling procedures followed modified clean technique methodology as outlined in the Division's Chemical Standard Operating Procedure: Modified Clean Technique Sampling Protocol (TNDEC 1996).

Chemical sampling at reference sites generally included all the parameters historically included by the Division in its long-term ambient monitoring network. As a concession to resource constraints, certain parameters, such as mercury, were dropped after they were never detected the first year of sampling. Additional parameters such as chlorophyll *a* were considered to have value, but were not sampled due to the need make the best use of program funding. Division staff were recently trained in algal assessment techniques and will likely incorporate rapid biological assessment protocols in future sampling efforts.

Macroinvertebrate samples were collected at ecoregional reference sites beginning in August 1996. Habitat and flow were also assessed. Outside expertise was sought to analyze the monitoring data to determine how sub-ecoregions aggregate by aquatic habitat and biological community to form ecosystems or bioregions. This step was essential for assessing benthic communities accurately and consistently.



Figure A-1. Tennessee Level IV ecoregions and locations of reference streams.



Figure A-2. The Little River within the Great Smoky Mountains National Park was selected as a reference stream for sub-ecoregion 66g.

How Are Reference Stream Data Being Used?

For the first time, the DWPC has regionally-based chemical, physical, and biological data representing least impacted conditions in Tennessee. These data are important to our program and have multiple applications.

For some time, it was known that an ecoregion-specific approach to certain water quality standards would provide greater accuracy. This ecoregion project has provided the data necessary to initiate nutrient criteria discussions.

Figures A-3 and A-4 illustrate the levels of total phosphorus (TP) and nitrate-nitrite (NO_3 - NO_2), respectively, documented at reference streams within each ecoregion. The box and whisker plot shows median measured concentrations and ranges. Based on the data collected, TP at less impacted streams is generally higher in West Tennessee than Middle and East Tennessee.

Finalizing the Ecoregion Reference Stream Nutrient Database

Additional steps are needed to finalize the ecoregion nutrient database:

- Incorporate data from other States. If reference streams in neighboring States are located within shared ecoregions and are selected and sampled in a similar manner to those in Tennessee, the nutrient data can be added into our database.
- Review the database for quality assurance. Data will be checked for outliers that may represent data entry errors. Outliers that indicate degrading conditions in reference streams will be identified. The Division considered eliminating outliers based on a consistent rationale, such as values more than two standard deviations from the mean, but decided against such an approach.

Development of Regional Interpretations of Narrative Nutrient Criteria

Division staff will propose ecoregion-specific interpretations of the narrative nutrient criteria for TP and nitrate-nitrite for the year 2000 triennial water quality standards review. These numeric goals will be used primarily for water quality assessment purposes.

The specific goals will likely be based on the establishment of the nutrient concentration for each ecoregion or subecoregions database at the 90th percentile of the reference stream data. (However, the Division has not ruled out the possibility of setting the criteria at the 75th percentile.) As an important part of the process, Division staff will statistically analyze nutrient levels and their ranges at each sub-ecoregion. Where significant differences exist between sub-ecoregions, the nutrient criteria will be established at the sub-ecoregion level. Where no significant difference is found between sub-ecoregions, the data will be aggregated back to the ecoregion level.

These numeric goals will provide the means to assess nutrient levels at similar streams within the same ecoregion. Streams with nutrient levels less than the 90^{th} (or 75^{th}) percentile of the reference stream database will be considered to meet the narrative criteria. Streams with nutrient levels higher than the reference stream database range will be considered in violation of the narrative criteria. These streams



Figure A-3. Total phosphorus concentrations (μ g/L) for reference streams within each ecoregion.

Key: 1 = Mississippi Alluvial Plain, 2 = Mississippi Valley Loess Plains, 3 = Southeastern Plains, 4 = Interior Plateau, 5 = Southeastern Appalachians, 6 = Central Appalachians, 7 = Ridge and Valley, 8 = Blue Ridge Mountains.



Figure A-4. Total nitrate-nitrite concentrations (mg/L) for reference streams within each ecoregion.

Key: 1 = Mississippi Alluvial Plain, 2 = Mississippi Valley Loess Plains, 3 = Southeastern Plains, 4 = Interior Plateau, 5 = Southeastern Appalachians, 6 = Central Appalachians, 7 = Ridge and Valley, 8 = Blue Ridge Mountains.

will be added to the 303(d) list for future TMDL generation. Additionally, the regional interpretation of the narrative criteria will provide the goal for TMDL control strategies.

Data Relationships

Division staff have taken a preliminary look at the reference stream data in an attempt to investigate relationships between sampled parameters. Examination of these relationships has three facets: (1) consideration of possible nutrient data surrogates, (2) exploring relationships between nutrient levels and biological indices, and (3) comparison of reference stream data to EPA's regional nutrient database.

1. The initial investigation was whether there was a relationship between nutrient levels and other chemical constituents in the water column. If a strong correlational relationship could be established, these other values could be used as data surrogates if nutrient data were unavailable or as a less costly substitute for nutrient sampling.

Relationships were investigated primarily for turbidity, total organic carbon (TOC), and suspended solids. We found numerous positive correlations, but the large number of data points at the detection level caused relationships to be suspect. For example, Figures A-5 and A-6 illustrate the relationship between total phosphorus and turbidity (r^2 value = 0.282) as well as total phosphorus and TOC (r^2 value = 0.163) in ecoregion 67g.

We intend to do the same type analysis with regional data from EPA's national nutrient database. At least in theory, this database would contain fewer observations below detection level.

2. If the correlation between either TP or nitrate+nitrite levels and the quality of biological communities can be established, a stronger rationale for ecoregion-specific numerical nutrient criteria can be provided. However, it should be noted that even where correlation is strong, identifying a numeric nutrient criteria is dependent on knowing the biological integrity score above which, the community is considered impaired. Fortunately, as in the case of nutrients, this biological integrity goal can be established from the reference stream data.

In sub-ecoregion 71h (Outer Nashville Basin), a preliminary comparison was done. Nitrate-nitrite levels were compared to two biological indices frequently used by the Division, the North Carolina Biotic Index (NCBI) and the Hilsenhoff Biotic Index (EPA Rapid Bioassessment Protocols, 1999). While there was some scatter in the dataset, a relationship was suggested which was slightly stronger for the Hilsenhoff index (Figure A-7) than the NCBI. (Figure A-8).

An additional test was done with the appearance of a relationship between nitrate-nitrite and NCBI scores. According to the reference stream database for sub-ecoregion 71h, the 75th percentile of the NCBI data is a score of approximately 5.0. Presuming that an NCBI score of 5.0 is the biological goal for sub-ecoregion 71h, then according to the above chart, nitrate-nitrite levels should not exceed approximately 1.2 mg/L. Following the same approach with the Hilsenhoff scores also produced a similar nitrate-nitrite level, approximately 1.2 mg/L. It is interesting to note that the 90th percentile of the reference stream nitrate-nitrite data for 71h is approximately 1.0 mg/L.