

MONITORING & REPORTING SUBCOMMITTEE BEACH WATER QUALITY WORKGROUP

303(d) LISTING CRITERIA

The Monitoring & Reporting Subcommittee recommends the following:

- **Listing should be based on frequency of water quality standards being exceeded.**
 - Frequency of water quality standard exceedances should be used as the “first screen”, and site-specific information should be considered when appropriate.
 - A beach should be listed when there is no enforcement capability to address the water quality impairment, and the only means available to address the water quality impairment is a TMDL.
 - The number of postings (the posting of warning signs on the beach by the local environmental health agency having jurisdiction) or the total number of days a beach is posted should not be considered.
 - The number of beach closures should not to be considered since the causes of beach closures can be addressed by enforcement actions.
- **The frequency threshold for listing should be the number of water quality standard exceedances in a relatively unimpaired watershed.**
 - When background data is not available, 10% of the total samples should be used as the threshold for listing per EPA 305(b).
 - If water quality monitoring is only conducted during the AB411¹ period (April 1 thru October 31), 4% of the total samples should be used as the threshold for listing.²
- **Listing should be primarily based on the frequency of water quality standards exceeding the threshold number in multiple years.**

¹ AB411, Statutes of 1997.

² SCCWRP, Bight 98 Study.

- **Permanent postings³ should be counted as exceedances when they are based on site-specific water quality data. “Precautionary” postings⁴ should not count as water quality exceedances.**
- **“Rain Advisories”⁵ should be considered in the same manner as precautionary postings. Site-specific data should be collected and used for listing determination.**
- **Establish monitoring stations at defined distances from storm drain discharges in order to enhance data consistency.**
- **Listing should be based on sufficient samples to achieve the 80% “confidence” level that the frequency threshold has been exceeded (Type 1 error of 0.2).**
 - A “binomial” model should be used.
 - How is geometric mean used?
- **Differences in the results of laboratory analyses utilizing different laboratory methods are insignificant.**
- **The length of beach to be listed should be 50 yards (meters?) on each side of the storm drain discharge.**

SIDE ISSUES:

- In the previous paper, we discussed why data was the way to list. Now should there be a discussion of why postings/closures are not appropriate for listing?
- There is no recommendation regarding the review of listings and delisting. What happens to the discussions concerning 5-6 years of data?
- Is there any discussion warranted regarding loss of beneficial use as defined by the posting/closure process?
- What about Monitoring Priority Lists?

³ Needs to be defined.

⁴ Needs to be defined.

⁵ Needs to be defined.