



ENERGY AND ENVIRONMENT CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER

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July 9, 2015

Ms. Shera Reems
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Via email to reems.shera@epa.gov

RE: Draft 2016 Integrated Report Memo

Dear Ms. Reems,

The Kentucky Division of Water (the Division) appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency (EPA) regarding the draft 2016 Integrated Report Memo.

The Division notes the following and asks the EPA to specifically address both issues:

1. On page 12, B. Water quality Framework: ATTAINS Redesign, the first paragraph is the same as the last paragraph in Section A.
2. On page 15, the second full paragraph states:

“For State water quality impairment data to be used in the CWA Section 106 grant allocation formula, the data needs to be available to the public in ATTAINS by September 1, 2016 for the water quality impairment data to be used in the CWA 106 grant allocation formula”, then goes on to state:

“To support the formula update, EPA will use the most current and complete assessment results from States available to the public in ATTAINS”.

The Division requests clarification of both statements. The draft memo does not indicate what procedures are in place should ATTAINS, which will not be available until Spring 2016, does not contain state data by September 1, 2016, nor does it indicate how recent data must be in order to meet the “most current and complete assessment results” requirement (for example, will EPA default to current data located in a different database, or provided in the 2016 Integrated Report?). The Division anticipates that 2014 data will be available in ATTAINS by September 1, 2016, but is uncertain of whether that will meet the “most current and complete assessment results” expected.

The Division appreciates the opportunity to voice its concerns regarding this important document. Please feel free to contact me at your convenience should you require further information.

Best regards,

A handwritten signature in black ink, appearing to read 'Peter Goodman', with a long horizontal flourish extending to the right.

Peter Goodman, Director
Kentucky Division of Water

PG/cjc

Cc: Susan Kirsch, ACWA (skirsch@acwa-us.org)