



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND WATERSHEDS

October 6, 2017

Jason Pappani
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

RE: EPA's Comments on Idaho's Proposed Rule and Revised Implementation Guidance for the Idaho Aquatic Life Copper Criteria Using the Biotic Ligand Model, Docket No. 58-0102-1502

Dear Jason:

The EPA appreciates the opportunity to provide comments to the Idaho Department of Environmental Quality (DEQ) on the proposed rule updating Idaho's aquatic life copper criteria using the biotic ligand model (BLM) and the associated implementation guidance. The EPA is pleased to see DEQ's proposed rule language includes the necessary specificity that input measurements must capture conditions when copper is most bioavailable. This additional clarity is essential given that input values to derive copper criteria must be scientifically sound and provide protection against toxicity to aquatic organisms in waters in Idaho consistent with the requirement that aquatic life criteria protect Idaho's designated uses.

The EPA continues to be supportive of DEQ's work on developing implementation guidance because appropriate requirements about how the BLM will be implemented in a site-specific manner are important when using a statewide approach as DEQ proposes. As stated in EPA's previous comment letters (May 18, 2017 and July 10, 2017) and given our more recent experience reviewing state adoption of the BLM, the EPA recommends either of the following two options from states who want to update their copper criteria:

1. Use of the BLM at specific sites to determine site-specific criteria (SSC) that are submitted to EPA for 303(c) action under the Clean Water Act (CWA). The state of Colorado has adopted this approach.
2. Use of the BLM as a performance-based approach where the EPA approves the approach but not each individual resulting SSC, as long as there are appropriate requirements about how the BLM will be implemented in a site-specific manner. The state of Oregon has adopted such an approach.

As stated in the EPA's previous comment letters to DEQ on the State's draft copper BLM implementation guidance, criteria derivation and implementation methods are critical for model-derived criteria because the models rely on input parameters that can vary in concentration or level over time and spatially throughout a site. Criteria derivation and implementation methods should address key considerations for model inputs and outputs, such as site selection and characterization, and how the most bioavailable conditions will be determined (including

analyzing model outputs, identifying the estimated default input parameters) for Idaho waters. In addition, the methods should identify when default input values and/or criteria values are to be used in lieu of sufficient ambient data at a particular site, provide recommendations for sampling frequency and locations, and describe the methodology for data screening, data processing, and model output interpretation. The EPA views criteria derivation and implementation methods as important for applying the copper criteria derived using the BLM in a consistent, repeatable, and protective manner. The methods must provide sufficient assurance that the criteria are protective of the aquatic life uses in Idaho.

The EPA is supportive of DEQ referencing a guidance document in rule. However, DEQ has stated it does not view the guidance as legally binding. The EPA believes it is important to include additional clarification and defined procedures in rule if the guidance is not legally binding. Additional clarity on this issue would be helpful, since as described in the revised guidance, there are several scenarios when this could occur. These include estimated or default acute and chronic criteria values provided by DEQ which may be used when no data are available or when data do not adequately characterize conditions when copper is most bioavailable or when dissolved organic carbon (DOC) or pH data are absent. As DEQ states in the revised implementation guidance, conservative criteria estimates should be used to estimate critical conditions of a waterbody or assessment unit. Additionally, DEQ states that the permit writer can use these conservative estimates to perform reasonable potential analysis and that these conservative estimates could also be utilized by the Idaho Pollutant Discharge Elimination System (NPDES) program when developing effluent limits for permits in those circumstances where data is insufficient or absent. Given how DEQ expects the estimated/default criteria values will be used in some circumstances, it seems reasonable to interpret these values as essentially legally binding criteria values.

It is the EPA's understanding that data for the ten input variables/parameters to calculate freshwater copper criteria using the BLM (temperature, pH, DOC, calcium, magnesium, sodium, potassium, sulfate, chloride, and alkalinity) on a waterbody specific basis in Idaho may be currently limited and/or non-existent. Therefore, it is particularly important for DEQ to provide legally binding default criteria values to be used in lieu of sufficient data at a particular site. As stated in previous comment letters, the EPA continues to recommend DEQ consider including the applicable defaults in rule or incorporate DEQ's implementation guidance by reference to indicate the guidance is legally binding.

In order to develop protective criteria values using the BLM as a performance-based approach, where the EPA approves the approach but not the resulting SSC, the state should include appropriate specifications around how it will be used site-specifically. A performance-based approach consists of a legally binding methodology¹ that provides a transparent, predictable, repeatable, and scientifically defensible procedure for the protection of designated uses. This approach relies on the adoption of a systematic process (i.e., a criterion derivation methodology)

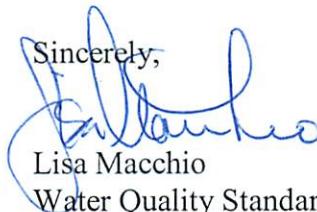
¹ EPA 2000. *EPA Review and Approval of State and Tribal Water Quality Standards*. Federal Register: April 27, 2000 (Volume 65, Number 82); Rules and Regulations; Page 24641-24653. Procedures to identify opportunities by which their adoption of criteria, as well as EPA's approval, can be streamlined.

rather than a specific outcome. The comprehensive and detailed implementation procedures (methodologies, minimum data requirements, and decision thresholds) of a performance-based approach establish a clear, predictable decision-making framework and have sufficient detail and suitable safeguards to ensure repeatable outcomes. Such procedures are either adopted into rule or provided in legally binding guidance that is referenced in rule. The EPA approval of such an approach also serves as approval of the outcomes as well. However, DEQ's revised implementation guidance lacks the necessary specificity to be considered a performance-based approach. The EPA is available to provide further assistance to DEQ to ensure that Idaho's copper BLM implementation guidance meets the requirements to be considered a performance-based approach. The EPA's current and previous comments have recommended the kind of additional detail to include in guidance or in rule when adopting the copper BLM as statewide criteria. Because the state of Oregon recently adopted, and the EPA approved a performance-based approach for a statewide copper criteria using the BLM with sufficient detail, the EPA continues to recommend DEQ include a similar level of detail in rule as Oregon has done and/or in binding guidance.

The EPA has reviewed DEQ's August 2017 revised implementation guidance and proposed rule language and is providing detailed recommendations in the enclosure to this letter. In addition, the EPA notes that a number of comments provided to DEQ in the EPA's previous comment letters have not been addressed (January 12, 2016, August 10, 2016, January 31, 2017, May 18, 2017, and July 10, 2017). Therefore, the EPA is reiterating many of those same comments in the enclosure and providing our review of DEQ's responses to some of these comments.

The EPA appreciates DEQ's commitment to develop implementation guidance to accompany Idaho's rule updating the aquatic life copper criteria using the BLM. The EPA continues to be available to provide assistance to DEQ on further development of the rule language and implementation procedures. If you have any questions or would like to discuss these comments further, please contact me at (206) 553-1834 or Mark Jankowski at (206) 553-1476.

Sincerely,



Lisa Macchio
Water Quality Standards Coordinator

Enclosure

Enclosure

Comments on Idaho DEQ's Proposed Rule Aquatic Life Copper Criteria Using the Biotic Ligand Model and Revised Implementation Guidance Docket No. 58-0102-1502

In summary, the EPA greatly appreciates DEQ's efforts in the development of implementation guidance² which provides information to support Idaho's adoption and use of the biotic ligand model (BLM) for the revised aquatic life criteria for copper. The EPA has reviewed DEQ's proposed rule language, revised implementation guidance and the negotiated rulemaking summary document³ and provides the following comments and recommendations for DEQ's consideration.

Rule Language

The EPA continues to recommend that DEQ not include numeric values for copper in the table of toxic criteria. Inserting example values in the table, even with an explanatory footnote, leads to confusion in implementation as to whether the values are the applicable criteria for all waters. DEQ's response to this comment, as provided in the rulemaking summary document, is that DEQ believes that frequent users of Idaho's water quality standards are familiar with the use of reference values. However, it is the EPA's understanding that there are many users of Idaho water quality standards, including the general public and/or new program staff who likely would not be as familiar as frequent users. One important consideration in revising and developing regulatory language is for the language to be easily understood so that it is more likely to be implemented consistent with what DEQ's intention. Idaho's adoption of the BLM as a statewide criteria for copper is sufficiently more complicated than any previous equation-based criteria adopted by Idaho, such as hardness based metals and ammonia, and therefore any additional clarity that can be provided by the rule language is critical.

The EPA recommends that the newly added provision at 58.01.02.210.03.c.v.(1)(b) be clarified. The following is the text of that provision:

c. Application of aquatic life metals criteria.

v. Copper Criteria for Aquatic Life.

(1) Aquatic life criteria for copper shall be derived using:

- (a) Biotic Ligand Model (BLM) software that calculates criteria consistent with the "Aquatic Life Ambient Freshwater Quality Criteria – Copper": EPA-822-R-07-001 (February 2007), available at www.deq.idaho.gov/58-0102-1502; or*

² Idaho Department of Environmental Quality. 2017. Implementation Guidance for the Idaho Copper Criteria for Aquatic Life, Using the Biotic Ligand Model. August 2017

³ Idaho Department of Environmental Quality. undated. Department of Environmental Quality, Water Quality Standards, IDAPA 58.01.02. Negotiated Rulemaking Summary, for Docket No. 58-0102-1502

(b) An estimate derived from BLM outputs that is based on a scientifically sound method and protective of the designated aquatic life use.

For Part c.v.(1)(a), the EPA recommends adding the phrase “calculated using adequate site-specific data to protect aquatic life under the range of conditions expected at the given site.”

The provision at c.v.(1)(b) now clarifies that the estimate does utilize the BLM, however it is unclear if DEQ’s intention is to allow the use of “default” or “estimated” criteria that is calculated, such as the criteria in Table 2 from Section 6 of the revised implementation guidance. The EPA recommends clarifying (b) to include the BLM-based estimates in rule, such as Table 2 from Section 6. Otherwise, the provision lacks specificity on the procedures or methods to be used to develop the criteria based on an estimate derived from the BLM outputs. Therefore, the EPA strongly recommends DEQ provide additional clarity regarding 58.01.02.210.03.c.v.(1)(b).

In addition, the provision at 58.01.02.210.03.c.v.(3) specifies that input values (from measured data) shall capture the most bioavailable conditions for copper. The EPA is supportive of this new provision as it provides a requirement in rule that the numeric values derived from the BLM are protective during the most bioavailable time period. Although the revised implementation guidance makes mention of critical time period and bioavailability, adding this language into rule provides the necessary detail that is lacking in the guidance. However, the EPA continues to recommend that DEQ include additional specificity in rule regarding copper bioavailability. As stated in EPA’s May 18, 2017 and July 10, 2017 comment letters, the EPA recommends the following additional language be included by DEQ in rule under 58.01.02.210.03.c.v.:

General Policy for the copper BLM

- 1) Determination of where and when the most bioavailable conditions occur at a site is required.*
- 2) Use of appropriate statistical methods to collect sufficiently representative data of the site is required in order to ensure that the most bioavailable period is captured by the dataset.*
- 3) When reconciling multiple instantaneous water quality criteria (IWQC) derived using the BLM, procedures will be used to ensure that the waterbody is protected at all times, including sensitive conditions i.e., most bioavailable.*

DEQ’s response to EPA’s recommendation to include this additional language in rule is as follows (Negotiated Rulemaking Summary, for Docket No. 58-0102-1502):

“By definition, an IWQC is protective of conditions *at the time* that the data were collected. Adopting in rule a procedure that reconciles multiple variable IWQCs and applies the lowest IWQC at all times is inconsistent with the science and time-specific nature of the BLM, and could result in the nonsensical situation where Idaho would be identifying waters as impaired by copper and investing limited state resources into TMDLs for waters where toxic copper conditions are never encountered.”⁴

⁴ IBID pg.3

The EPA notes that sufficiently representative IWQC's are important for implementation purposes. As long as DEQ has temporal and spatially representative input data for calculating IWQC's that protect all conditions at the site, as well as the most bioavailable conditions, the EPA would agree with DEQ's response. However, where data is not available, is scarce, and or not representative of the critical conditions, DEQ should make use of conservative estimates or inputs. The EPA continues to stress that if data are not sufficient to capture the range of conditions at the site or the monitoring did not capture the range of conditions, including those that are time varying, then conservative estimates are needed to ensure the waterbody is protected at all times. The EPA continues to recommend that DEQ include this additional clarification because there is sufficient uncertainty whether DEQ will have the appropriately representative input data when needed.

The revised rule at 210.03.c.v.(5) states the following:

c. Application of aquatic life metals criteria.

v. (5) Implementation Guidance for the Idaho Copper Criteria for Aquatic Life. The "Implementation Guidance for the Idaho Copper Criteria for Aquatic Life" describes in detail methods for implementing the aquatic life criteria for copper using the BLM. This guidance, or its updates, will provide assistance to the Department and the public for determining minimum data requirements for BLM inputs and how to estimate criteria when data are incomplete or unavailable. The "Implementation Guidance for the Idaho Copper Criteria for Aquatic Life" is available at the Department of Environmental Quality, 1410 N. Hilton, Boise, Idaho 83706, and on the DEQ website at www.deq.idaho.gov.

In reviewing DEQ's revised implementation guidance, the EPA believes there are a number of important areas in which the guidance does not provide detailed implementation methods, such as determining minimum data requirements, guidance on developing permit limits, and identifying impairments. The EPA has reviewed DEQ's most recent draft IPDES and waterbody assessment guidance and did not find detailed procedures or methods with respect to developing permit limits or identifying impairments for copper using the BLM. As a result, the EPA continues to recommend that DEQ's implementation guidance include detailed methods for its Clean Water Act programs. This would include identifying the default or estimated criteria values that DEQ intends to use in its permits, TMDL, and listing programs if sufficient data are lacking for a site, evaluating reasonable potential to exceed, development of water quality based effluent limits using the copper BLM criteria under NPDES permitting, and methods that will be used to identify impairments of copper for 303(d) listing, and TMDL development.

Deriving Estimated Default Criteria

DEQ's recent revisions to Table 2 in section 6 of the revised implementation guidance is much improved as it now includes the additional data for copper DEQ collected in April 2017. However, the EPA is still concerned that DEQ has not explained how the approach to deriving estimated default criteria in Table 2 is representative of the conditions under which copper would be most bioavailable at each site. Given the limited data collection, i.e., one sample from each

site, the EPA cannot be assured that the results presented in Table 2 as potential default criteria are scientifically defensible. In order to discern how protective the default criteria are of Idaho waters, a Type II error (*false negative*) analysis is recommended. This is an important analysis for DEQ to perform that would, in part, provide a justification for use of these criteria values and ensure that the values are protective of Idaho's aquatic life uses. In addition, the EPA recommends including all available data of acceptable quality, including U.S. Geological Survey's National Water System Information System (NWIS) data.

In Section 3 of the revised implementation guidance, "General Implementation for Aquatic Life Criteria," DEQ identifies an existing provision of the Idaho rules that states the following: "When a mixing zone is authorized, the BLM derived chronic copper criterion will apply at the boundary of the mixing zone (Section 210.03.a)." Because it is unlikely that limits on DOC will be in a NPDES permit, criteria calculated at the edge of the mixing zone could potentially be less stringent than criteria calculated at a representative ambient location, and therefore may not protect downstream uses. Likewise, certain discharges could result in less stringent criteria calculated upstream of the discharge than at the edge of the mixing zone. Therefore, the guidance should be more specific regarding the calculation of criteria at a representative ambient location, taking into account the most bioavailable conditions at a site.

With respect to the first bullet point under Section 3 of the revised implementation guidance which states that the BLM-derived criteria will apply at the boundary of any regulatory mixing zone, the EPA notes that the criteria also apply to the rest of the waterbody outside the mixing zone. Therefore, the limits in a permit must also ensure protection across the zone of influence of the discharge.

Furthermore, the second bullet in Section 3 states in part the following:

Water quality-based effluent limits shall be based on criteria exceedances only occurring during low-flow conditions that meet the following criteria: the lowest 1-day flow with a 10-year occurrence (1Q10) for acute copper criteria or based on an allowable exceedance occurring no more than once every 3 years (1B3).

The EPA would like to note that the most bioavailable conditions are not necessarily during low-flow time periods. Instead, the EPA recommends that DEQ use conservative flows for purposes of dilution of the effluent, conservative criteria for the site, and conservative copper concentration in effluent to ensure that the frequency of exceedance requirements are met.

Previous and Specific Comments on the Revised Implementation Guidance

Section 5.3: Spatial Representation. The EPA recommends that DEQ provide more detail or decision criteria for determining what is a "representative" location as this would help the EPA more fully understand DEQ's proposed procedures. For example, how will DEQ determine if a sampling location is representative of an assessment unit? Also, what is the spatial extent of an assessment unit? DEQ is required to assess all readily available data to determine attainment. If data is not being used, DEQ should provide a rationale as to why a given sampling location is not representative and the data does not apply to that assessment unit. Therefore, DEQ should design their monitoring plan to focus on representative sampling locations to ensure the majority of

collected data can be fully utilized for the assessment.

The EPA reiterates our previous comment that in order to protect sensitive aquatic uses, when monitoring to determine criteria values, a location that is representative of the most bioavailable conditions (baseline) of the receiving water at a site should be used. The EPA recommends DEQ include clarification that monitoring must represent and characterize conditions when copper is most bioavailable. Further, DEQ should include a discussion that determination of where and when the most bioavailable conditions occur at a site is required. Whether the location is downstream or upstream of effluent is not as critical as monitoring a location that is known to represent the most bioavailable conditions at a site.

5.3.2. Monitoring to Identify Criteria for Use in Effluent Limit Development: The EPA strongly recommends that DEQ develop detailed methods associated with deriving copper criteria and that detail is best contained in rule or in DEQ's Draft Implementation Guidance for the Idaho Copper Criteria for Aquatic Life rather than in IPDES guidance. The brief discussion provided in this section of the guidance is not sufficiently detailed such that it provides the necessary information and direction that is needed for implementation across programs. Idaho DEQ's water quality standards staff should be the experts at Idaho's BLM criteria development and should be able to provide technical assistance for its use in other state programs. Furthermore, DEQ's IPDES program and permit writers should be provided with sufficient direction and detail from DEQ's water quality standards program as to how to derive the applicable copper criteria for a waterbody. In circumstances where criteria need to be determined on a waterbody specific basis, DEQ's water quality standards program should be able to provide detailed procedures/methodology for each approach and/or options that DEQ recommends as appropriate in the guidance.

The EPA continues to recommend guidance include additional details with respect to NPDES permitting. Further coordination between DEQ's WQS and IPDES programs would be helpful in the development of sufficiently detailed guidance for evaluating both reasonable potential to exceed (RPTE) and development of water quality-based effluent limits (WQBELs) using the copper BLM criteria. The guidance should cover unique considerations or circumstances for identifying copper as a pollutant of concern, determining the applicable criteria (considering spatial and temporal variation), evaluating RPTE both with or without data needed to establish the applicable criteria, and calculating WQBELs based on the applicable criteria. If copper is identified as a pollutant of concern, then reasonable potential must be evaluated using the applicable criteria, with or without monitored input data. The guidance should identify how to address this uncertainty in permitting.

The EPA Region 10 WQS and NPDES programs have been coordinating our review of DEQ's Draft Implementation Guidance for the Idaho Copper Criteria for Aquatic Life and DEQ's IPDES ELDG guidance, specifically with respect to the section on the copper BLM. The EPA believes it would be beneficial for the two programs (NPDES/WQS) at both DEQ and EPA to work collectively to address the various criteria issues that are likely to be challenging from a permitting perspective. The goal would be to develop additional detailed methods so that the IPDES program has the necessary tools to consistently develop protective effluent limits based on the copper BLM derived criteria. For example, the EPA could provide assistance to DEQ in

development of a template to be used by both the water quality standards and IPDES permitting staff that would contain a number of specific procedures. Another example is working together on methods to use when there is a lack of input data to use in the model, the kind of data and specific methods to use when deriving estimated input values, and more specific detail on representative monitoring.

6.1 Estimating Conservative Criteria: The EPA continues to recommend that DEQ use all available high quality data and that the estimates/default criteria presented in Table 2 should be included in the rule or at a minimum incorporated by reference in the rule.

The EPA has reviewed DEQ's response in the negotiated rulemaking summary document⁵ and understands DEQ's desire for the implementation guidance to allow for flexibility. However, it is important to ensure a balance between providing flexibility with sufficient prescriptiveness such that the approach can consistently result in protective criteria. This is especially important given that DEQ has opted for a statewide approach to implementing the copper BLM rather than using the BLM on a site-specific criteria basis. Furthermore, DEQ has previously represented to the EPA and stakeholders that BLM input data is limited in Idaho. Therefore, the EPA continues to see the need for default criteria in Idaho to be relevant and appropriate. The EPA is supportive of any efforts by DEQ to collect sufficient data to employ the BLM as intended, however, the EPA continues to stress the importance of having default criteria available for when input data are not sufficient or when there is uncertainty about whether the data are sufficiently representative and/or capture the most bioavailable conditions.

In addition, DEQ stated the following in the negotiated rulemaking summary document: *"providing flexibility in implementation procedures allows permit writers, dischargers, DEQ's assessors and TMDL writers to take advantage of novel approaches such as the fixed monitoring benchmark (FMB), to develop effluent limits."*⁶ Because the EPA has not fully the use of FMB approach on a statewide basis, it is not appropriate at this time for DEQ to imply that it can be used in developing effluent limits. The FMB can be used in Colorado because it is coupled with the site-specific approach in deriving copper criteria using the BLM. The EPA recommends DEQ consult further with EPA when considering use of the FMB for any purposes.

The EPA recommends DEQ include methods for deriving default inputs when available data are limited as well as present the option of using the EPA's missing parameters document as a guide for those default inputs. This type of information should be included in both IPDES permitting guidance i.e., (ELDG) and the Implementation Guidance for the Idaho Copper Criteria for Aquatic Life. The EPA understands DEQ's preference not to cite to the EPA's draft missing parameters document as it is draft at this time. The EPA suggests DEQ include a reference to the document once it is finalized.

In addition, on page 25 of the revised implementation guidance, DEQ continues to provide for users to propose alternative methods for estimating protective criteria and that the proposed estimates must be based on scientifically sound methods and demonstrated to be protective of

⁵ IBID pg.1.

⁶ IBID pg.1.

aquatic life. Given there is a lack of detail regarding the methodology that would be employed, it is not clear that the public, stakeholders, and the EPA would have the opportunity to provide comments on the derivation process. The EPA recommends DEQ either remove this wording or provide clarity that an approach that deviates from what DEQ provides in rule or guidance would entail adoption as site-specific criteria. Furthermore, the process for such an approach would include all elements consistent with a site-specific criteria approach, which includes adoption into rule and submission to EPA for CWA review and action.

303(d) Listings: It is prudent to be cautious with impairment listings and guard against false positives (listed when it was not warranted), but it is also prudent to be cautious of not listing a water when it should be. Please describe how false negative (not listing a water when it is warranted) determinations will be minimized. Since DEQ can derive estimated or default inputs, such as using those provided in EPA's Draft Missing Parameters Document, the EPA expects DEQ to calculate copper criteria using the BLM for any waterbody once the criteria are in effect. Therefore, there should not be instances where a waterbody is listed under Category 3 (insufficient information) for a lack of input parameter data since Category 3 should only be used where a site lacks copper data to compare with the calculated criterion. The EPA requests that DEQ provide more clarity on the listing procedures that the state will use when data are unavailable. The EPA appreciates that DEQ has added a hierarchy for the listing process that details the process for determining what parameter data are available, and when defaults or estimates will be used versus when the model will be run. However, the EPA has some additional questions regarding the approach.

Overall, the EPA recommends that DEQ clarify that the state will list waterbodies according to the State's 303(d) official listing methodology. In the hierarchy contained in the methodology, it is unclear if DEQ will consistently list a waterbody as impaired after two exceedances within a three-year period. For Step (1) of the data hierarchy, EPA recommends using "e.g.," instead of "i.e."—in regards to identifying the most bioavailable periods for each assessment unit (AU), since DEQ will be collecting more data and gain an improved understanding of bioavailability over time. For Step (2), the approach of using data from a representative reach within the AU and "seasonally representative" data would require a basis and is not supported by the currently available data which shows higher frequency than seasonal variability in the bioavailability of copper. In order to measure/protect the most bioavailable conditions, the EPA recommends that DEQ collect input data for each copper sample at the same place and time or if there is more than one set of measurements in an AU, to use a conservative criterion number applied to the AU. For Step (3) of the hierarchy, the EPA is requesting clarification on what "follow-up monitoring" means. For example, if DEQ is using historical copper data without concurrently sampled input data to use in BLM calculations, and must use the default criteria instead of site-derived BLM criteria, it is unclear if the waterbody will be listed as impaired after two exceedances within a three-year period. Since DEQ's application of the default criteria is to be used when site-specific input data are unavailable, the listing approach should be consistent with Idaho's rules and the State's listing methodology. Please also describe how this information will be managed and tracked from listing cycle to listing cycle, and if there is a process by which a third party could provide new parameter data and request re-assessment using the model.