



REGION 7 ADMINISTRATOR

LENEXA, KS 66219

September 29, 2026

Ms. Amie Davidson
Division Administrator
Environmental Services Division
Iowa Department of Natural Resources
6200 Park Avenue, Ste. 200
Des Moines, Iowa 50321

Dear Ms. Davidson:

The U.S. Environmental Protection Agency has completed a comprehensive review of Iowa's 2024 Clean Water Act Section 303(d) List of Water Quality Limited Segments still requiring Total Maximum Daily Loads (Iowa's 2024 303(d) list). On November 12, 2024, the EPA issued its decision partially approving and partially disapproving Iowa's 2024 303(d) list. In its decision, the EPA also identified WQLSs for addition to Iowa's 2024 303(d) list and sought public comment on these additions. On July 11, 2025, the EPA rescinded for reconsideration its partial disapproval of the 2024 303(d) list and addition of seven segments and conducted a comprehensive review of relevant and supporting information, including any "good cause" basis provided by Iowa Department of Natural Resources, and "existing and readily available data."

The EPA has determined that Iowa's 2024 CWA 303(d) list meets the requirements of CWA section 303(d) and the EPA's implementing regulations. Therefore, the EPA approves Iowa's 2024 303(d) list without the addition of the seven segments. This action does not otherwise impact the EPA's November 12, 2024, approval of Iowa's 2024 303(d) list. The EPA's decision is fully described in the enclosure.

We continue to look forward to receiving the Iowa 2026 section 303(d) list. If you would like to further discuss the EPA's action on the 2024 list, please contact Jeffery Robichaud, of my staff at (913) 708-3778 or via email at robichaud.jeffery@epa.gov.

Sincerely,

Jim Macy

Enclosure

1. Rationale for Final Action on Iowa's 2024 Clean Water Act Section 303(D) List for Segments: IA 02-CED-456, IA 04-LDM-1011, IA 04-UDM-1211, IA 02-IOW-628IA, 04-RAC-1116, & IA 03-SSK-927

ENCLOSURE
RATIONALE FOR FINAL ACTION ON IOWA'S 2024 CLEAN WATER ACT SECTION 303(D) LIST FOR
SEGMENTS:

IA 02-CED-456, IA 04-LDM-1011, IA 04-UDM-1211, IA 02-IOW-628IA, 04-RAC-1116, & IA 03-SSK-927

Introduction

This document establishes the U.S. Environmental Protection Agency's (EPA) reasoning for approving the remaining portion of Iowa's 2024 Clean Water Act (CWA) Section 303(d), following reconsideration of prior list actions with regards to the segments¹ listed below.

The EPA received Iowa's 2024 303(d) list on June 24, 2024, through the Assessment, Total Maximum Daily Load (TMDL) Tracking and Implementation System (ATTAINS). On November 12, 2024, the EPA issued its decision partially approving and partially disapproving Iowa's 2024 303(d) list. In its November 12, 2024, decision, the EPA also identified Water Quality Limited Segments (WQLSs) for addition to the portion of the list that it disapproved and sought public comment on these additions. The EPA accepted public comments on these additions between November 13 and December 19, 2024. A list of the seven WQLSs added to the list pursuant to the November 12, 2024, partial disapproval was provided to Iowa Department of Natural Resources (IDNR) and included the following WQLSs:

Assessment ID	Assessment Name	Parameter
IA 02-CED-456	Cedar River	Nitrate plus nitrite as N
IA 04-LDM-1011	Des Moines River	Nitrate plus nitrite as N
IA 04-UDM-1211	Des Moines River	Nitrate plus nitrite as N
IA 02-IOW-628	Iowa River	Nitrate as N
IA 02-IOW-628	Iowa River	Nitrate plus nitrite as N
IA 04-RAC-1116	Raccoon River	Nitrate plus nitrite as N
IA 03-SSK-927	South Skunk River	Nitrate plus nitrite as N

On July 11, 2025, the EPA rescinded for reconsideration its partial disapproval of the 2024 303(d) list and addition of the seven above segments and conducted a comprehensive review of relevant and supporting information, including any "good cause" basis provided by IDNR, and "existing and readily available data." This existing and readily available data included data related to the EPA approved numeric and narrative criteria.

Based on this comprehensive review, the EPA is approving the remaining portion of Iowa's 2024 303(d) list regarding segments for which the Agency rescinded its partial disapproval and addition to Iowa's 2024 303(d) list on July 11, 2025. This action does not otherwise impact the EPA's November 12, 2024, partial approval of Iowa's 303(d) list and the partial approval is unmodified. The EPA continues to support its partial approval of Iowa's 303(d) list consistent with the requirements of CWA section 303(d) and EPA's implementing regulations with the inclusion of 705 WQLSs for 577 water bodies within Category 5.

¹ In this decision, the term "segments" refers to waters as identified by the state through its assessment identification.

Background

Section 303(d)(1) of the CWA and the EPA's implementing regulations at 40 CFR 130.7 require states, territories, and authorized Tribes (herein referred to as "states") to identify waters for which effluent limitations required by CWA Section 301(b)(1)(A) and (B) are not stringent enough to implement any applicable water quality standard (WQS). States need not identify on their lists waters where the following controls are adequate to implement applicable standards: (1) technology-based effluent limitations required by the Act, (2) more stringent effluent limitations required by state or local authority, and (3) other pollution control requirements required by state, local, or federal authority. 40 CFR 130.7(b)(1), (2). CWA 303(d) lists must identify WQLSs still requiring TMDLs. 40 CFR 130.7(b). The definition of "water quality limited segment" in 40 CFR 130.2(j) includes any segment where it is known that water quality does not meet applicable WQSs (referred to as "impaired waters"), and any segment that is not expected to meet applicable WQSs (referred to as "threatened waters"), "even after the application of the technology-based effluent limitations required by" the Act. The term "applicable WQSs" refers to those WQSs established under Section 303 of the Act, including numeric criteria, narrative criteria, waterbody uses and antidegradation requirements. 40 CFR 130.7(b)(3). An impaired or threatened water must be on the 303(d) list and requires a TMDL unless the state can demonstrate that no pollutant(s) causes or contributes to the impairment or one or more of the three types of requirements described earlier in this paragraph are stringent enough to implement applicable WQSs.

In addition, in developing their CWA 303(d) lists, states must meet several procedural, submission, and content requirements as described in this decision document. States must assemble and evaluate all existing and readily available water quality-related data and information to develop the CWA 303(d) list. 40 CFR 130.7(b)(5). In reviewing a state's 303(d) list submission, the EPA considers whether the state has satisfied the requirements under 40 CFR 130.7(b)(5) to assemble and evaluate all existing and readily available water quality-related data and information when developing their CWA 303(d) list. This includes, at a minimum, all existing and readily available data and information about the following categories of waters: (1) waters identified as partially meeting or not meeting designated uses, or as threatened, in the state's most recent CWA Section 305(b) report; (2) waters for which dilution calculations or predictive modeling indicate non-attainment of applicable WQSs; (3) waters for which water quality problems have been reported by local, state, and federal agencies; members of the public; and academic institutions (these organizations and groups should be actively solicited for research they may be conducting or reporting); and (4) waters identified as impaired or threatened in any CWA Section 319 nonpoint source assessment submitted to the EPA. In addition to these minimum categories, states are required to assemble and evaluate any other water quality-related data and information that is existing and readily available. 40 CFR 130.7(b)(5).

States must use existing and readily available water quality-related data and information in developing the CWA 303(d) list, 40 CFR 130.7(b)(5), unless they provide a rationale not to use them, 40 CFR 130.7(b)(6)(iii). The EPA evaluates whether a state provides a technical, science-based rationale for decisions not to use data or information in developing the list. EPA regulations at 40 CFR 130.7(b)(6) require states to include, as part of their submissions to the EPA list, documentation to support the state's determination to include or not include waters on its 303(d). Such documentation must include, at a minimum, (1) a description of the methodology used to develop the 303(d) list; (2) a description of the data and information used to identify waters, including a description of the data and information used by the state as required by 40 CFR 130.7(b)(5); (3) a rationale for any decision to not use any existing and readily available data and information for any one of the categories of waters as described in

40 CFR 130.7(b)(5); and (4) any other reasonable information requested by the EPA. Upon request by the EPA, each state must demonstrate good cause for not including a water or waters on the list. Consistent with 40 CFR 130.7(b)(6)(iv), good cause includes, but is not limited to, more recent or accurate data; more sophisticated water quality modeling; flaws in the original analysis that led to the water being listed in the categories in § 130.7(b)(5); or changes in conditions, e.g., new control equipment, or elimination of discharges.

The EPA approves a list only if it meets the requirements of 40 CFR 130.7(b). 40 CFR 130.7(d)(2). If the EPA approves the listing(s), the state must incorporate the listing(s) into its current Water Quality Management (WQM) plan. If the EPA disapproves a listing decision(s), the EPA must, not later than 30 days after the date of such disapproval, identify waters for inclusion on the 303(d) list. The EPA then must promptly issue a public notice seeking comment on the listing(s). After considering public comment and making any revisions the EPA deems appropriate, the EPA must transmit the listing(s) to the state, and the state must incorporate the listing(s) into its WQM plan. Id.

Iowa River Segments

On November 12, 2024, the EPA added these segments to Iowa's 303(d) list based solely on EPA's interpretation of Iowa's water quality standard for Nitrate plus nitrate as N. The EPA has since reevaluated these listings. In the reevaluation, the EPA considered Iowa's interpretation of its own water quality standards, which have been longstanding. The EPA also reevaluated all existing information to make a determination as to whether that information sufficiently demonstrated an impairment of these segments for Nitrate plus nitrate as N.

The EPA first considered Iowa's narrative water quality criteria, which states that for class "C" waters (which are to be protected as a raw water source of potable supply), "[a]ll substances toxic or detrimental to humans or detrimental to treatment processes shall be limited to non-toxic or non-detrimental concentrations in the surface water." In its reevaluation, the EPA reviewed existing and readily available data and information from the two surface water systems in this segment of the Iowa River; the city of Iowa City PWS (IA5225079), which relies on a combination of the Iowa River and a series of wells, and the University of Iowa Water System (IA5225101) which primarily uses the Iowa River. While this data indicated that the University of Iowa Water System (IA5225101) installed and began operating a reverse osmosis system in July of 2021 to treat water from the Iowa River, there is no conclusive information available that states that the additional treatment costs incurred by the system were specifically the result of concentrations of Nitrate as N and Nitrate plus nitrate as N. Therefore, the EPA does not have information demonstrating that the Nitrate as N and Nitrate plus nitrate as N were "detrimental to treatment processes" such that these segments are impaired for this narrative water quality criteria.

EPA also evaluated Iowa River data from the University of Iowa's IWQIS system, which provides on its website daily average nitrate concentrations based on real time sensors. The University of Iowa maintains a water quality gage and sensor array on the Iowa River (WQS0001) that was monitored from 2022 to 2026. While this data does exist, the EPA understands that the State of Iowa is currently precluded by state law from using this data in evaluating potential impairments. Additionally, EPA recognizes that while 38 out of 362 days with exceedances does produce a 10.5% exceedance by days, if there had been a full dataset for 365 days, that would have affected the days of exceedance. Additionally, the data from the IWQIS website is not readily available in a publicly available format that

can be extracted into a comprehensive dataset, therefore the EPA is not making a determination that this is data that can solely impact the listing determination for these segments.

That said, the EPA is aware that USGS is actively working with the state to analyze the statistical differences between real-time sensor data and IDNR's grab sample method to determine if results from IWQIS sensors can be incorporated into their assessment process. However, IDNR has noted that they did not complete this analytical work in time to incorporate this data into their assessment process during the 2024 Integrated Reporting cycle.

For these reasons, the EPA is approving Iowa's 303(d) list with regard to these segments for the 2024 cycle.

Cedar, Upper Des Moines and Racoon River Segments

The Agency has determined upon reconsideration that three of the segments it previously added to Iowa's 2024 303(d) list (Cedar River IA 02-CED-456, Des Moines River IA 04-UDM-1211, and the Racoon River IA 04-RAC-1116), have existing EPA-approved TMDLs, which remain in place under 40 CFR 130.7(c). In its November 12, 2024, decision, EPA did not consider the extent to which these TMDLs addressed Nitrate plus nitrite as N. These EPA-approved TMDLs are an integral part of the State's Water Quality Management Plan (WQMP) in accordance with 40 CFR 130.7(d)(2). In addition, these TMDLs were incorporated by reference in IDNR's May 9, 2024 submittal letter, which stated that all assessments for the 2024 listing cycle, as well as historical assessments, are available through Iowa's CWA Section 305(b) database, ADBNet: (<https://programs.iowadnr.gov/adbnnet/>).

As part of its reconsideration, the EPA reviewed these EPA-approved TMDLs, which broadly target Nitrate as N, in the case of the Des Moines and Racoon Rivers, and Total Nitrogen in the case of the Cedar River. The EPA determined that all three TMDLs were set also at the level necessary to attain applicable water quality standards for Nitrate plus nitrite as N based on the ratio of Nitrate:Nitrite found in these rivers and the three TMDLs' establishment of a 9.5 mg/L target that has a Margin of Safety (MOS) of 0.5 mg/L, well in excess of the related nitrite level based on this ratio. As a result, EPA has determined these segments have TMDLs in place that address impairment for Nitrate plus nitrate as N and therefore are not WQLS still requiring TMDLs. Accordingly, EPA is approving Iowa's 2024 303(d) list with regard to these segments.

Lower Des Moines River and South Skunk River Segments

On reconsideration, EPA observed that data from the University's IWQIS station located on the Lower Des Moines River (WQS0115) collected Nitrate plus nitrite as N data starting in 2022, without an exceedance of the approved numeric water quality standards. The South Skunk River does not have a similar monitoring station located within the segment.

Additionally, during reevaluation of the data submitted by the State through ADBNet data, EPA identified an inconsistency in the site IDs associated with these two water bodies that, along with other potential data anomalies, raised concern regarding the accuracy of the data.

Finally, in its reevaluation, the EPA reviewed additional data and information from the two surface water systems in these segments of the Lower Des Moines River (Ottumwa Water Works IA9083012) and South Skunk River (Oskaloosa Municipal Water Department IA6273005). The EPA did not identify information

related to these systems that indicated water supply advisories lasting >30 days per year, other problems not requiring closure but affecting treatment costs, nor one or more drinking water supply closures per year.

EPA is approving the state's 2024 303(d) list with regard to these segments. However, the EPA encourages Iowa to address the data limitations in the next listing cycle and consider working with the University of Iowa to add an IWQIS station on this segment of the South Skunk River.

Summary of EPA's decision on the 2024 CWA 303(d) list

After careful review of Iowa's final CWA 303(d) list submission package, and additional data and information during the reconsideration period, the EPA has determined that the remaining portion of Iowa's 2024 303(d) list meets the requirements of Section 303(d) of the CWA and EPA's implementing regulations. Therefore, the EPA approves the remaining portion of Iowa's 2024 303(d) list, as described above.