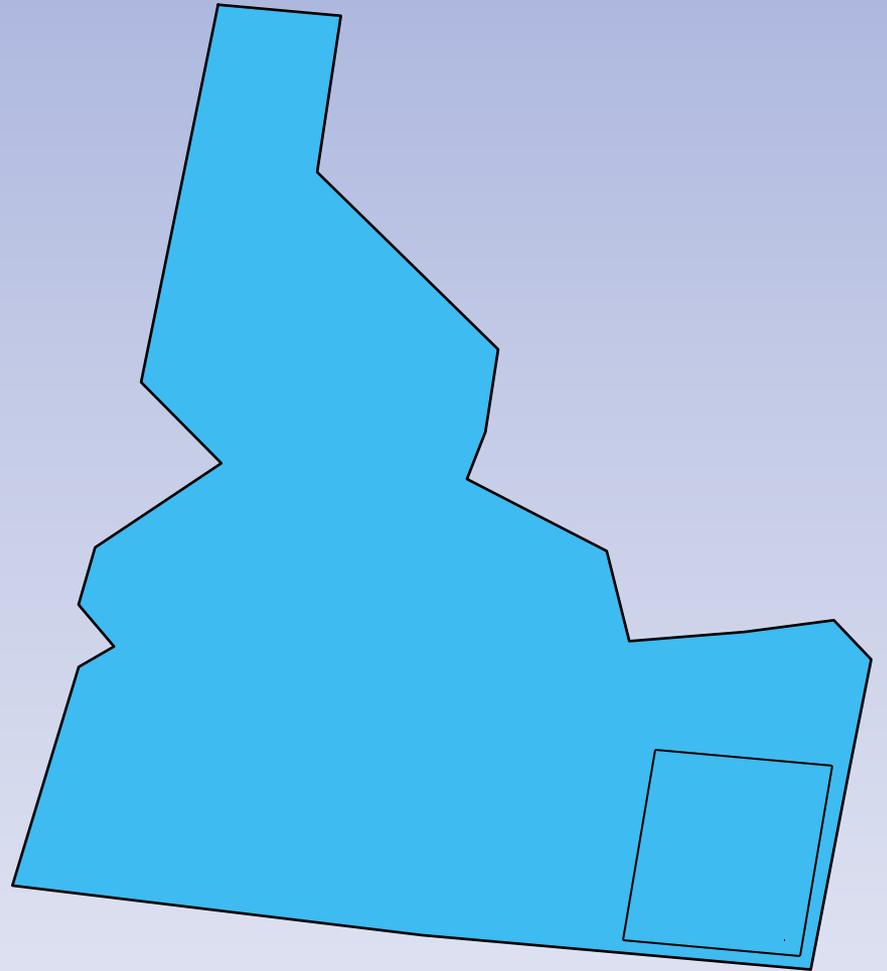


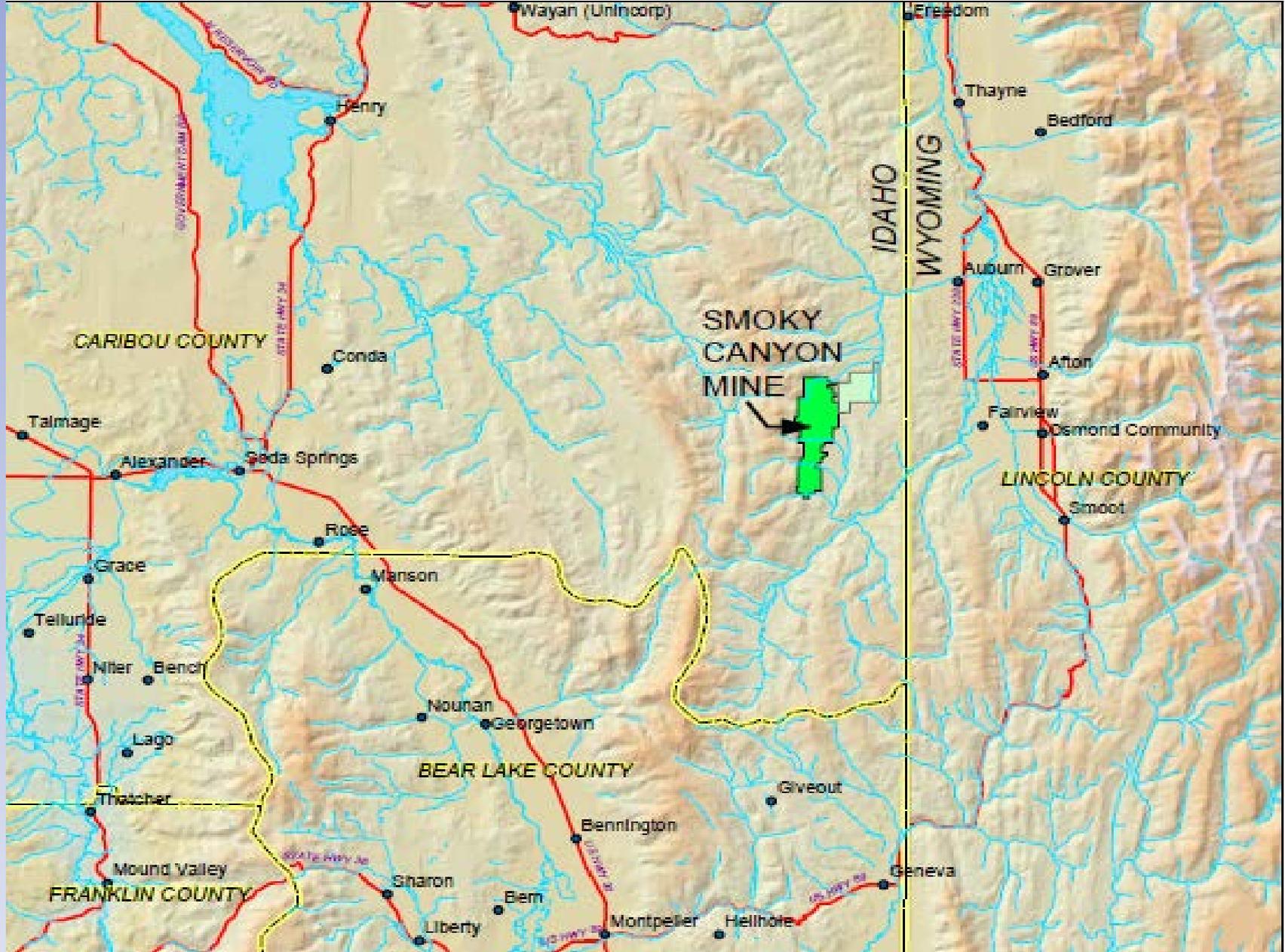


**Proposal for a Site-Specific Selenium Criterion
in Southeast Idaho**

**Smoky Canyon Mine
Caribou County, Idaho
June 2017**

North America Phosphates





Resident Fish

Key species:

- Brown trout
- Yellowstone cutthroat trout.



Technical Approach

- Field Monitoring Studies
 - Characterize exposure environment
 - Fish and invertebrate community condition
- Field/Laboratory Testing
 - Adult Reproductive Success
 - Early Life Stage (ELS) Study
- Literature Review
 - Range of species sensitivities
- Develop tissue based effects value

Cooperative Agency Involvement

- Simplot worked collaboratively with personnel from:
 - Idaho Department of Environmental Quality (IDEQ)
 - Idaho Department of Fish and Game (IDFG)
 - Environmental Protection Agency (USEPA)
 - Fish and Wildlife Service (USFWS – invited but did not participate)
 - Forest Service (USFS)
 - Wyoming Department of Environmental Quality (WDEQ)
- Frequent discussions, agency input, and review on approach, methods, and procedural issues

Basis for Site-Specific Standards

[IDAPA 58.01.02.275]

1. Resident species are more or less sensitive than those species used to develop a water quality criterion.
2. Biological availability and/or toxicity may be altered due to differences between the physicochemical characteristics of the water in a water body and the lab water used in developing water quality criterion.

Rules describe involvement of the Department in the work for scientific validity of the work.

Conduct Supporting Studies

- Laboratory Studies
 - Characterize effects using site species and exposures
- Compile and evaluate the current literature
 - Use literature as basis for developing the study and evaluating its results
- Conduct field studies
 - Characterize the exposure environment

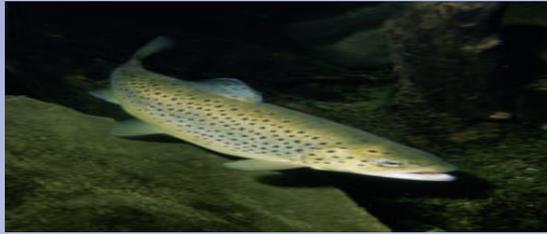
Wild Fish Collection



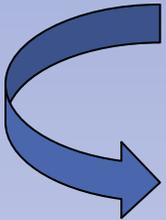
Collect Eggs



Adult Reproduction Studies



Collect adult pre-spawn wild fish – collect gametes and raise eggs in the lab



Hatch eggs



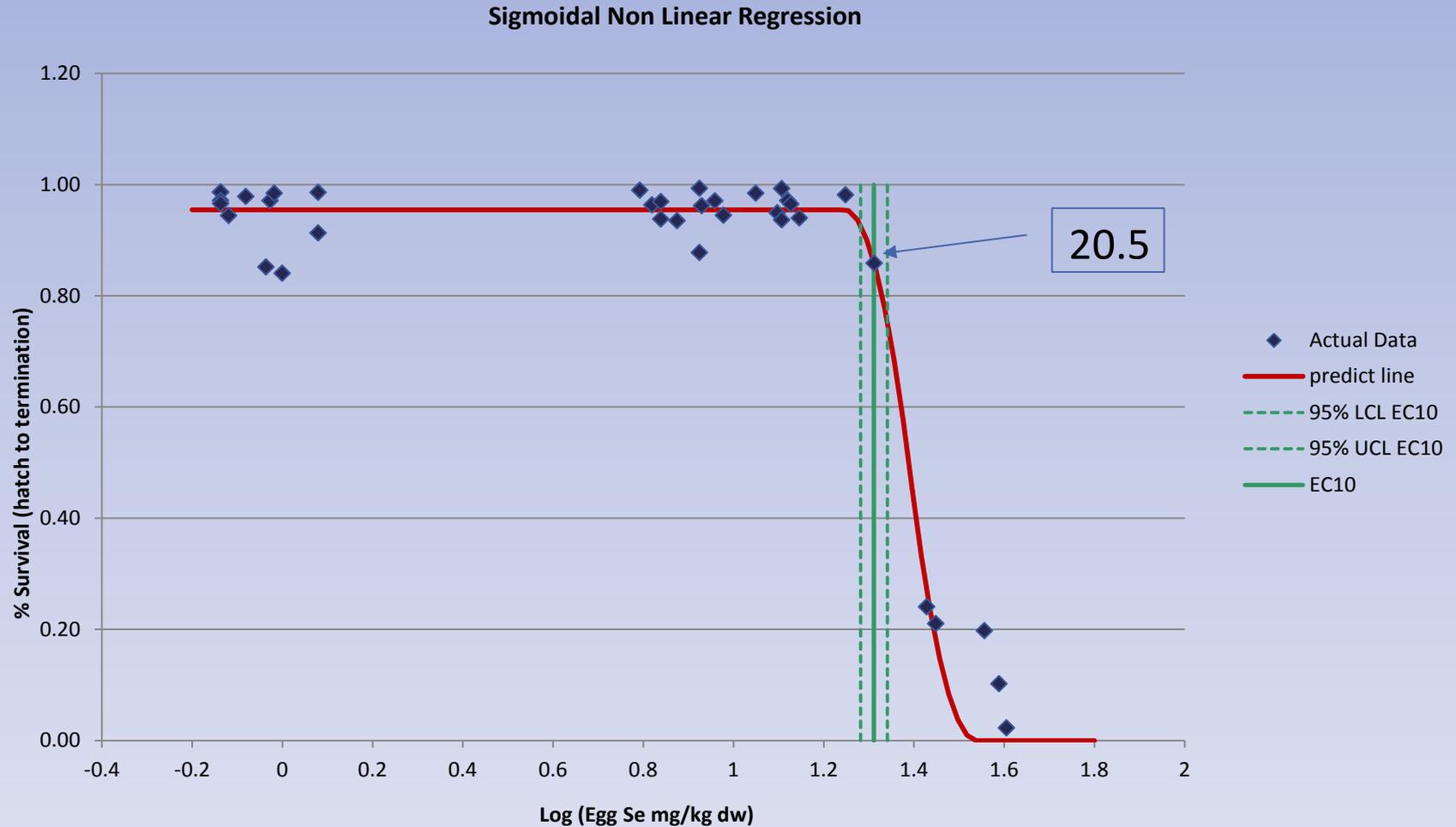
Raise to swim up or other periods when active feeding begins



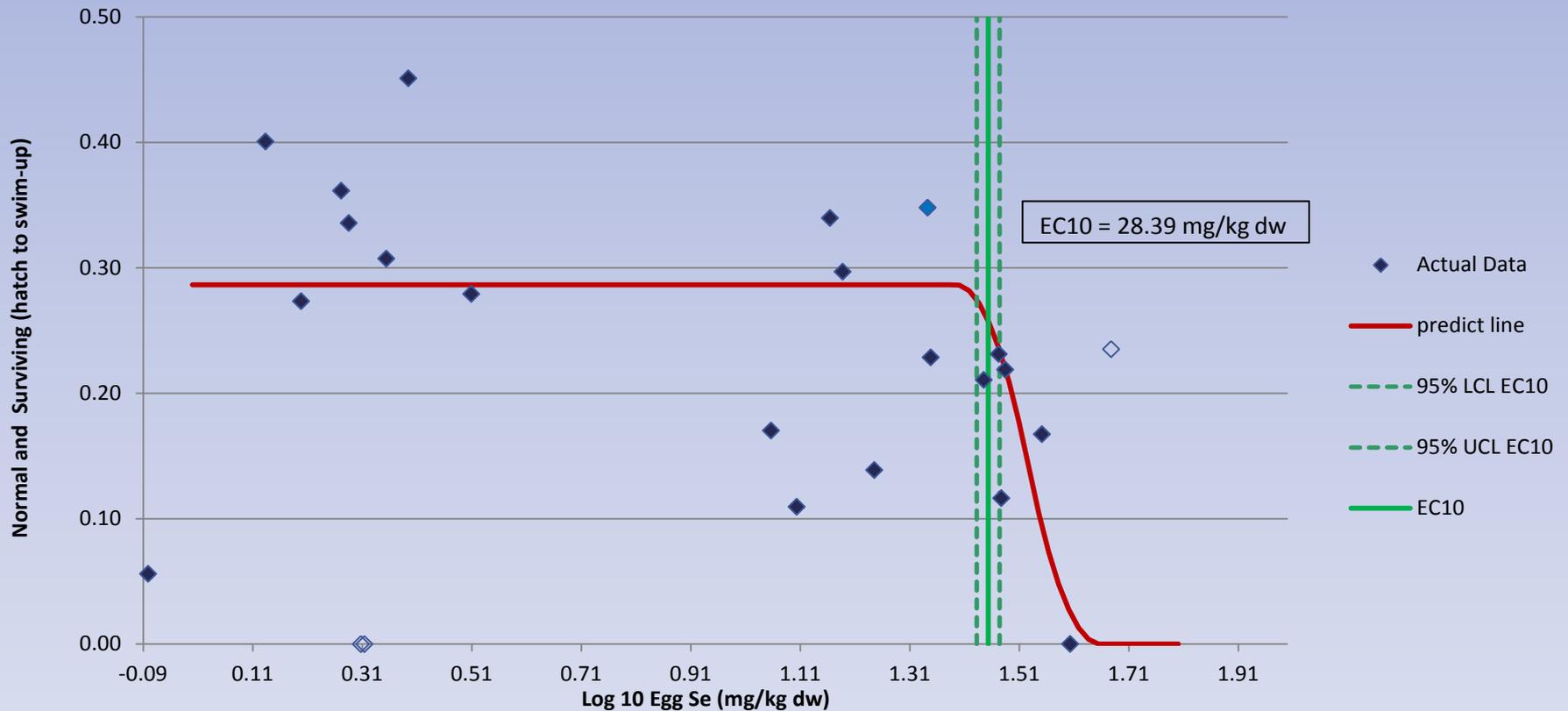
Measure Endpoints



Sigmoidal Non Linear Regression of Brown Trout Egg Selenium Concentrations Versus Survival Percentage (Hatch to Test End)

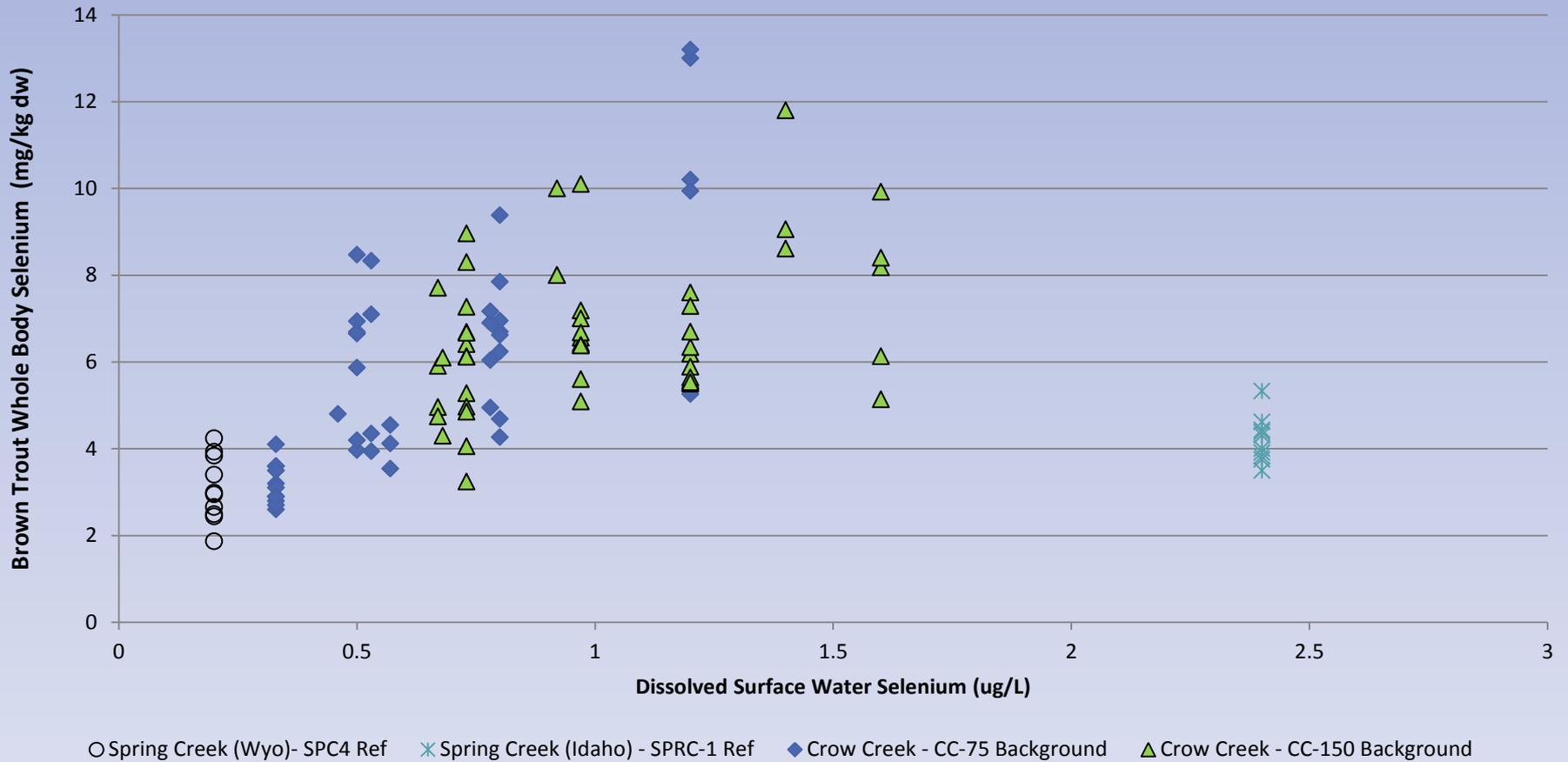


Relationship of YCT Egg Selenium Concentrations to Proportion of Normal and Surviving Fry



Brown Trout Whole Body Tissue and Surface Water Selenium Concentrations 2006 to 2011

Background

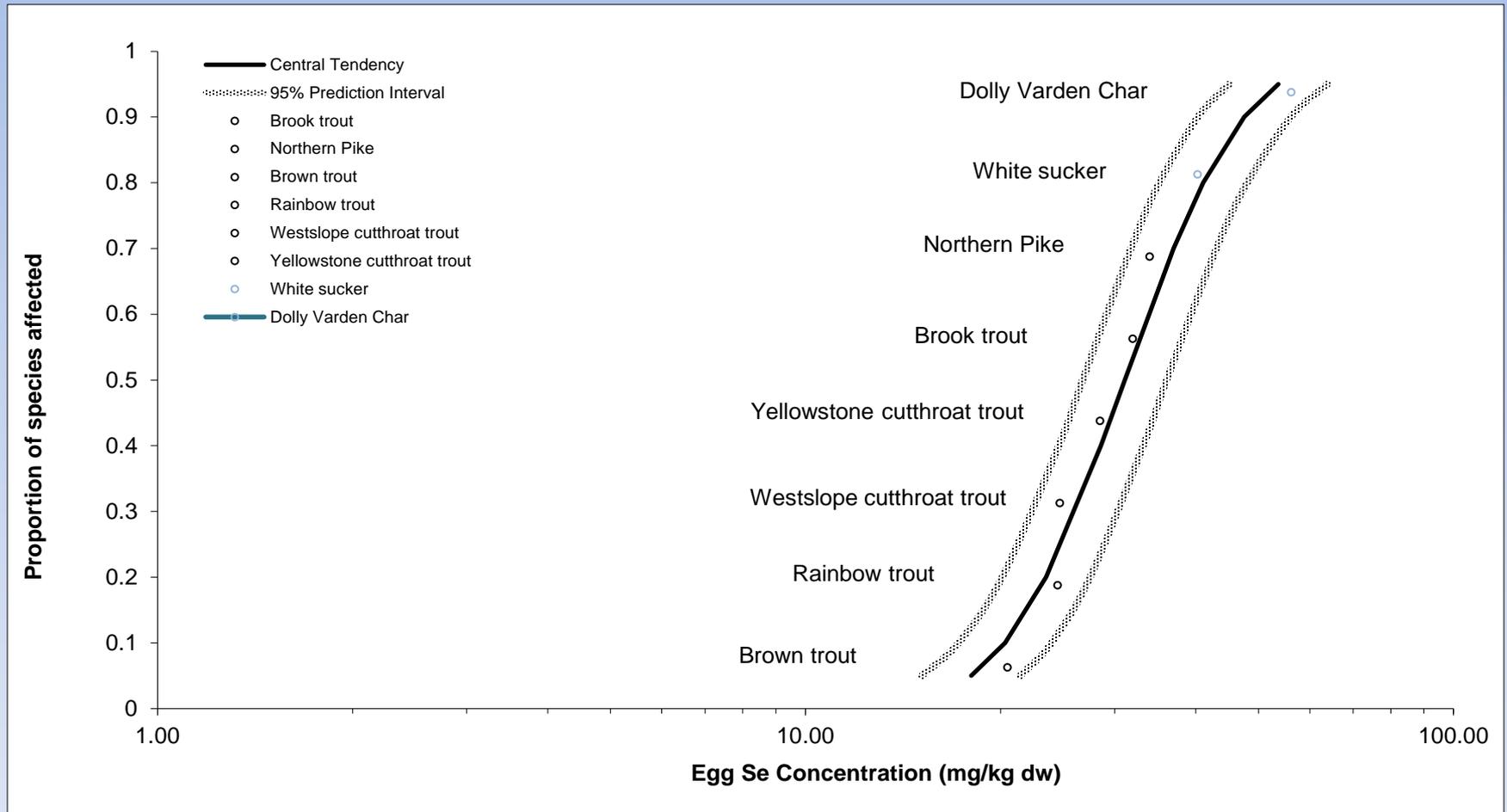


Summary of egg selenium thresholds in wild fish from coldwater systems

Species	Source Study	Adult Exposure	Endpoint	Tissue	Endpoint Statistic	Selenium	Statistic Derivation Source
						(µg/g dry weight)	
Brown Trout	Formation Environmental (2012)	Field	Alevin survival	Egg	EC10	20.5	a
Brown Trout	USEPA interpretation of Formation Environmental (2012)	Field	Alevin survival	Egg	EC10	21	b
Brook Trout	Holm et al. 2005	Field	Larval deformities	Egg	NOEL	>48.7	b,c
Brook Trout	Holm et al. 2005	Field	Larval survival	Egg	EC10	32	a
Rainbow Trout	Holm 2002; Holm et al. 2003; Holm et al. 2005d	Field	Larval deformities	Egg	EC10	24.5	b
Yellowstone Cutthroat Trout	Hardy 2005; Hardy 2010	Lab	Larval deformities/ survival	Egg	NOEL	>16.04	b,c
	Formation Environmental (2012)	Field	Alevin survival and normal	Egg	EC10	28.5	a
Westslope Cutthroat Trout	Kennedy et al. 2000	Field	Larval deformities/ survival	Egg	NOEL	>21	c
	Rudolph et al. 2008	Field	Alevin survival	Egg	EC10	24.7	b
	Nautilus 2011; Elphick et al. 2009	Field	Alevin survival	Egg	EC10	27.7	b
Dolly Varden Char	Golder 2009e; McDonald et al. 2010	Field	Larval deformities	Egg	EC10	56.2	b
Northern Pike	Muscatello et al. 2006	Field	Larval deformities	Egg	EC24	34	b
White Sucker	de Rosemond et al. 2005	Field	Larval deformities	Egg	NOEL	40.3	b

Original table Source: Selenium Tissue thresholds - Tissue Selection Criteria, Threshold Development Endpoints, and Potential to Predict Population or Community Effects in the Field (NAMC 2009)

Fish Species Sensitivity Distribution



Deriving Criterion Elements

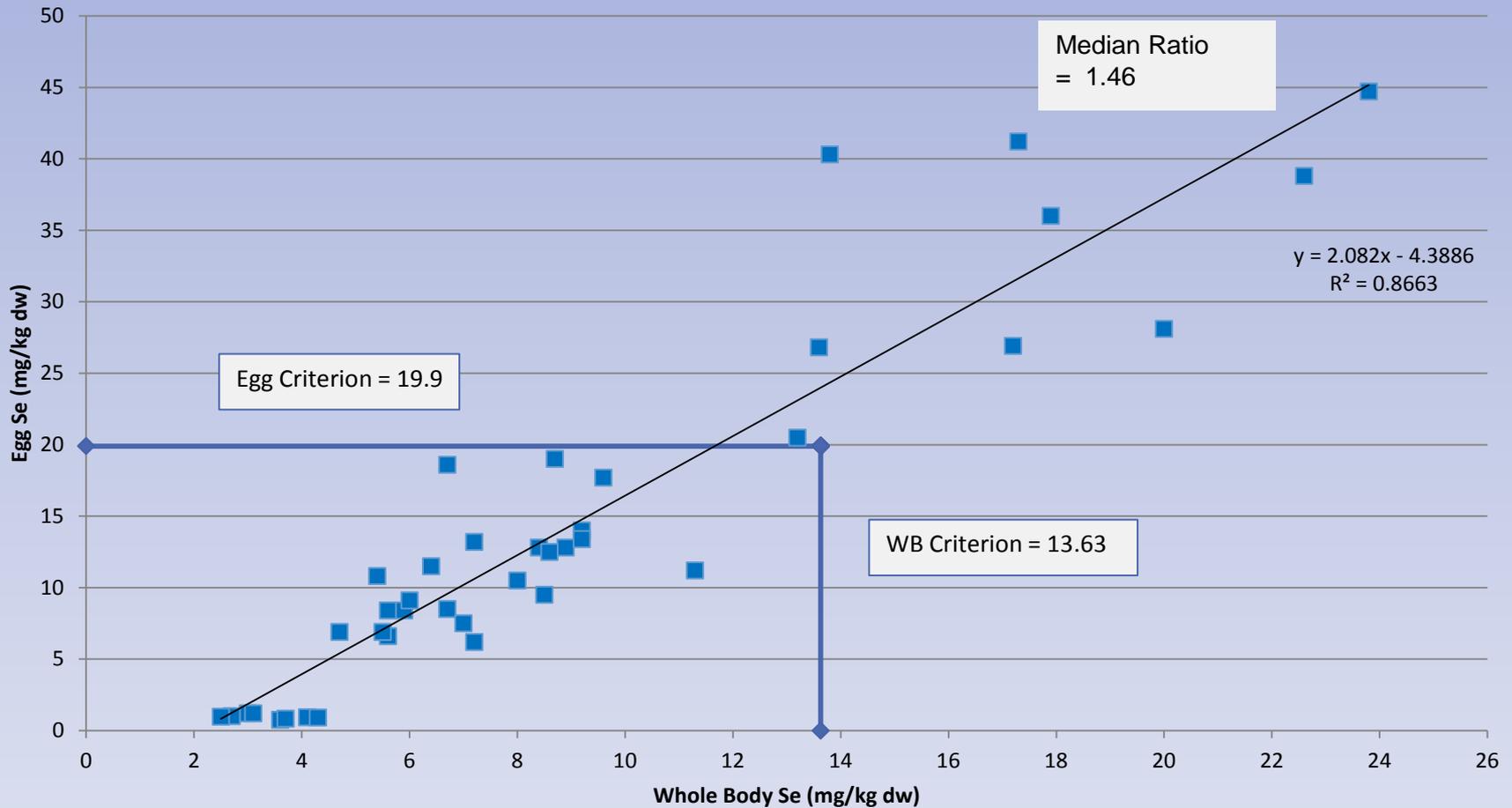
USEPA 2016 Derivation of Egg Criterion

		Rank	Common name	Genus	GMCV	
		15		waived1	--	
		14		waived1	--	
		13	Oligochaete	Lumbriculus variegatus		169.4
		12	Dolly Varden	Salvelinus malma		56.2
		11	Rotifer	Brachionus calyciflorus		45.8
		10	Mosquitofish	Gambusia2	>13.38 WB	
		9	Fathead minnow	Pimephales promelas2	<25.6	
		8	Northern Pike	Esox lucius		34
		7	Mayfly	Centropilum triangulifer		29.3
		6	Desert Pupfish	Cyprinodon macularius		27
		5	Largemouth bass	Micropterus salmoides		26.3
		4	Cutthroat Trout	Oncorhynchus		25.3
		3	Brown Trout	Salmo trutta		21
		2	Bluegill sunfish	Lepomis macrochirus		20.6
		1	White sturgeon	Acipenser transmontanus		15.6
Input						
N	GMCV	Rank	ln(GMCV)	ln(GMCV) ²	P=R/(N+1)	sqrt(P)
15	25.3	4	3.23	10.44	0.250	0.500
	21	3	3.04	9.27	0.188	0.433
	20.6	2	3.03	9.15	0.125	0.354
	15.6	1	2.75	7.55	0.063	0.250
		Sum:	12.05	36.41	0.63	1.54
					S ² =	3.43
					S =	1.85
					L =	2.30
					A =	2.71
					Chronic Criterion (mg/kg dw)	15.1

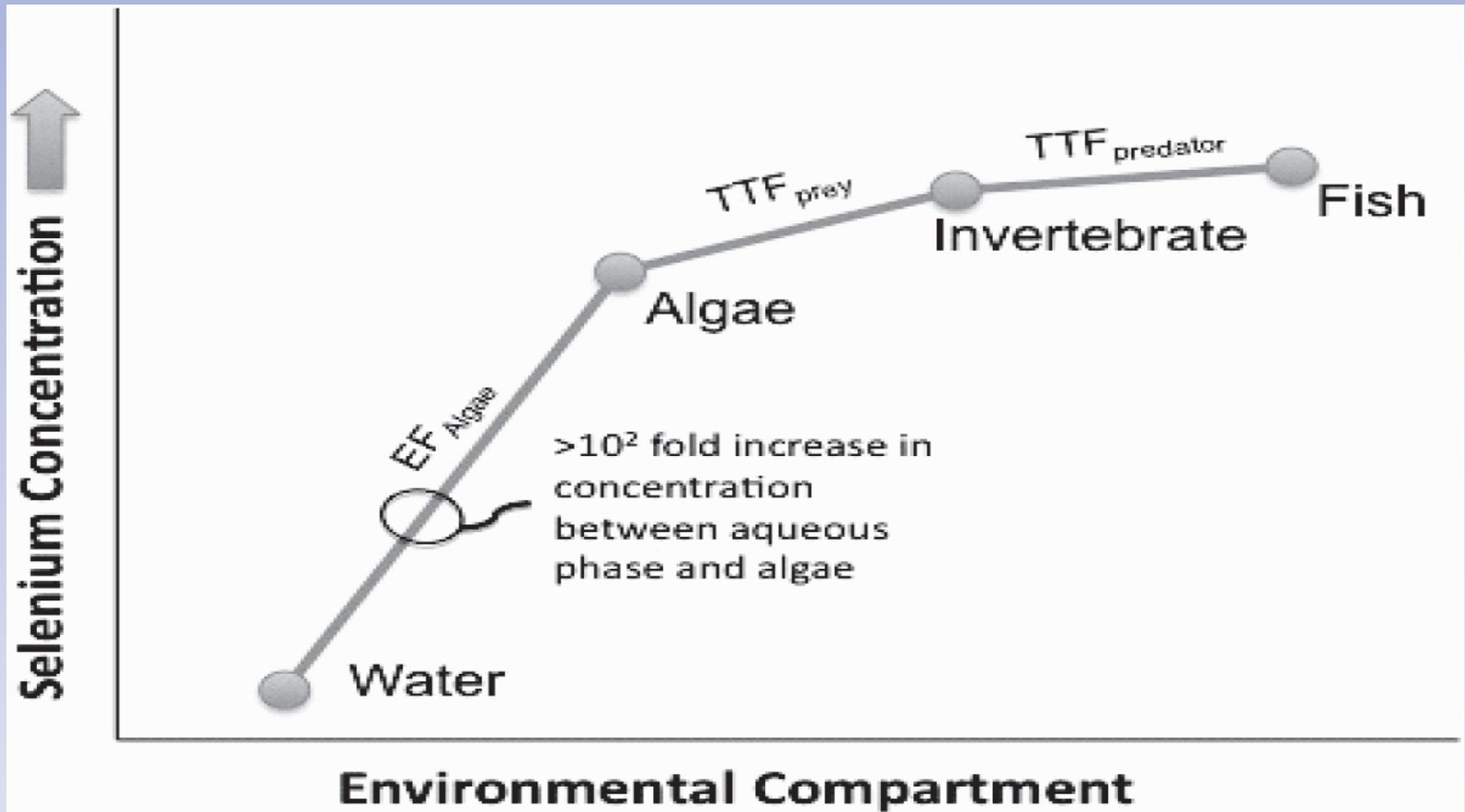
Simplot Derivation of Egg SSSC

		Rank	Common name	Species	SMCV		
			14	waived1	--		
			13	waived1	--		
			12 Oligochaete	Lumbriculus variegatus		169.4	
			11 Rotifer	Brachionus calyciflorus		45.8	
			10 African clawed frog	Xenopus laevis		44.9	
			9 White Sucker	Catostomus commersonii		40.3	
			8 Fathead minnow	Pimephales promelas3		38.73	
			7 Brook Trout	Salvelinus malma		32	
			6 Mayfly	Centroptilum triangulifer		29.3	
			5 Slimy Sculpin	Cottus cognatus2		>22	
			4 Yellowstone Cutthroat Trout	Oncorhynchus clarkii bouvieri		28.39	
			3 Westslope Cutthroat Trout	Oncorhynchus clarkii		26.2	
			2 Rainbow Trout	Oncorhynchus mykiss		24.5	
			1 Brown Trout	Salmo trutta		20.5	
Input							
N	SMCV	Rank		ln(SMCV)	ln(SMCV) ²	P=R/(N+1)	sqrt(P)
14	28.39	4		3.35	11.20	0.267	0.516
	26.2	3		3.27	10.67	0.200	0.447
	24.5	2		3.20	10.23	0.133	0.365
	20.5	1		3.02	9.12	0.067	0.258
		Sum:		12.83	41.22	0.67	1.59
						S ² =	1.56
						S =	1.25
						L =	2.71
						A =	2.99
						Chronic Criterion (mg/kg dw)	19.9

Relationship of Brown Trout Egg and Whole Body Selenium Concentrations and the Egg to Whole Body Conversion Factor



General Enrichment and Trophic Transfer Model (Luoma and Presser 2009)

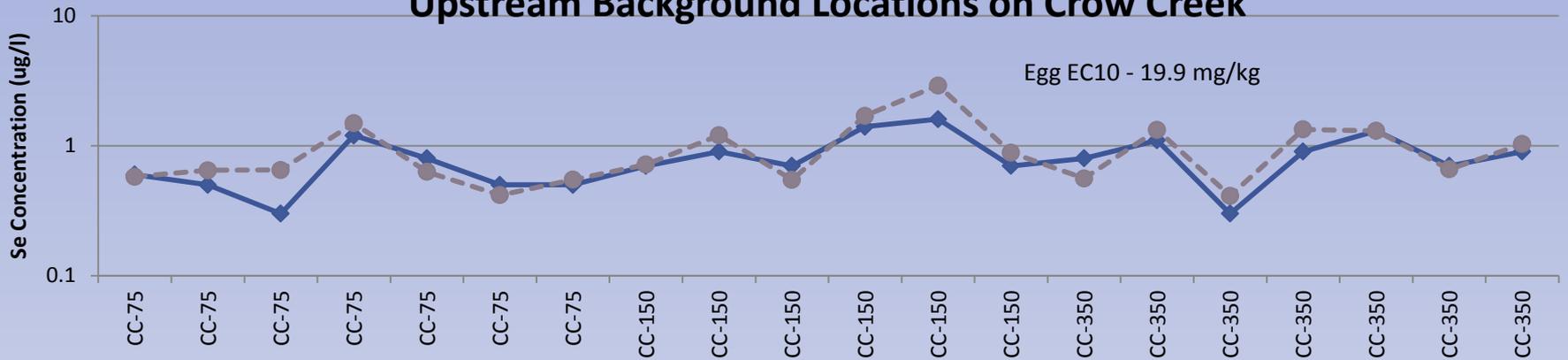


Derivation of Water Threshold using the Mechanistic Model

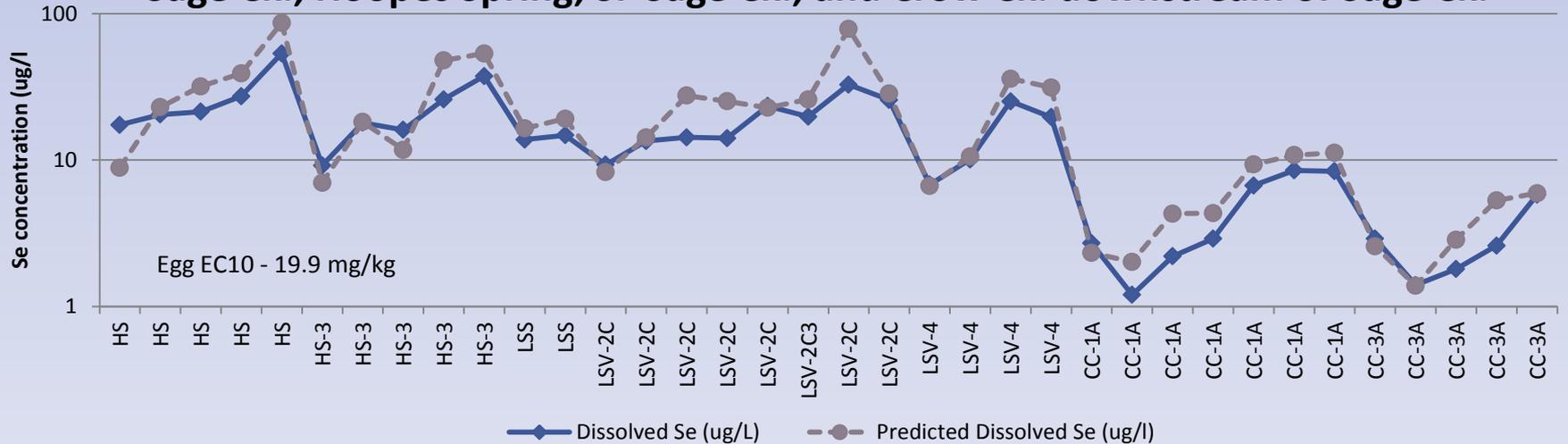
- $$C_{water} = \frac{C_{egg}}{TTF_{composite} \times EF \times CF}$$
 - C_{water} = predicted dissolved water concentration of selenium (micrograms per liter [ug/L])
 - C_{egg} = target egg selenium criterion (19.9 mg/kg dw)
 - EF = selenium concentration (mg/kg dw) in particulate materials / dissolved selenium concentration in water
 - CF = Whole body to egg conversion factor (1.46)

Measured Dissolved Selenium versus Predicted Dissolved Selenium Derived Using the Mechanistic Trophic Model

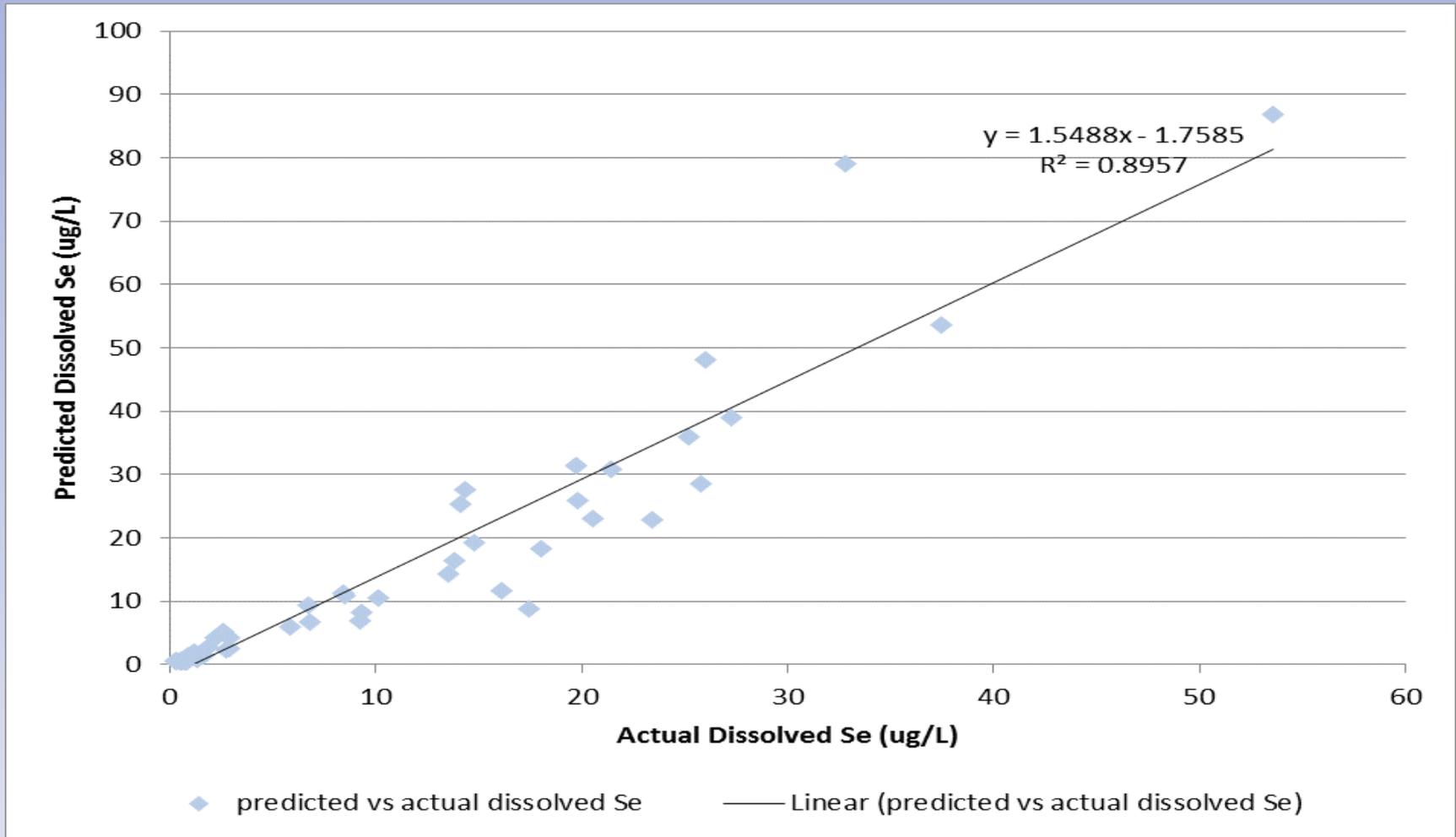
Upstream Background Locations on Crow Creek



Sage Ck., Hoopes Spring, SF Sage Ck., and Crow Ck. downstream of Sage Ck.



Relationship of Predicted vs Actual Dissolved Selenium Concentrations Derived from Mechanistic Trophic Model Approach



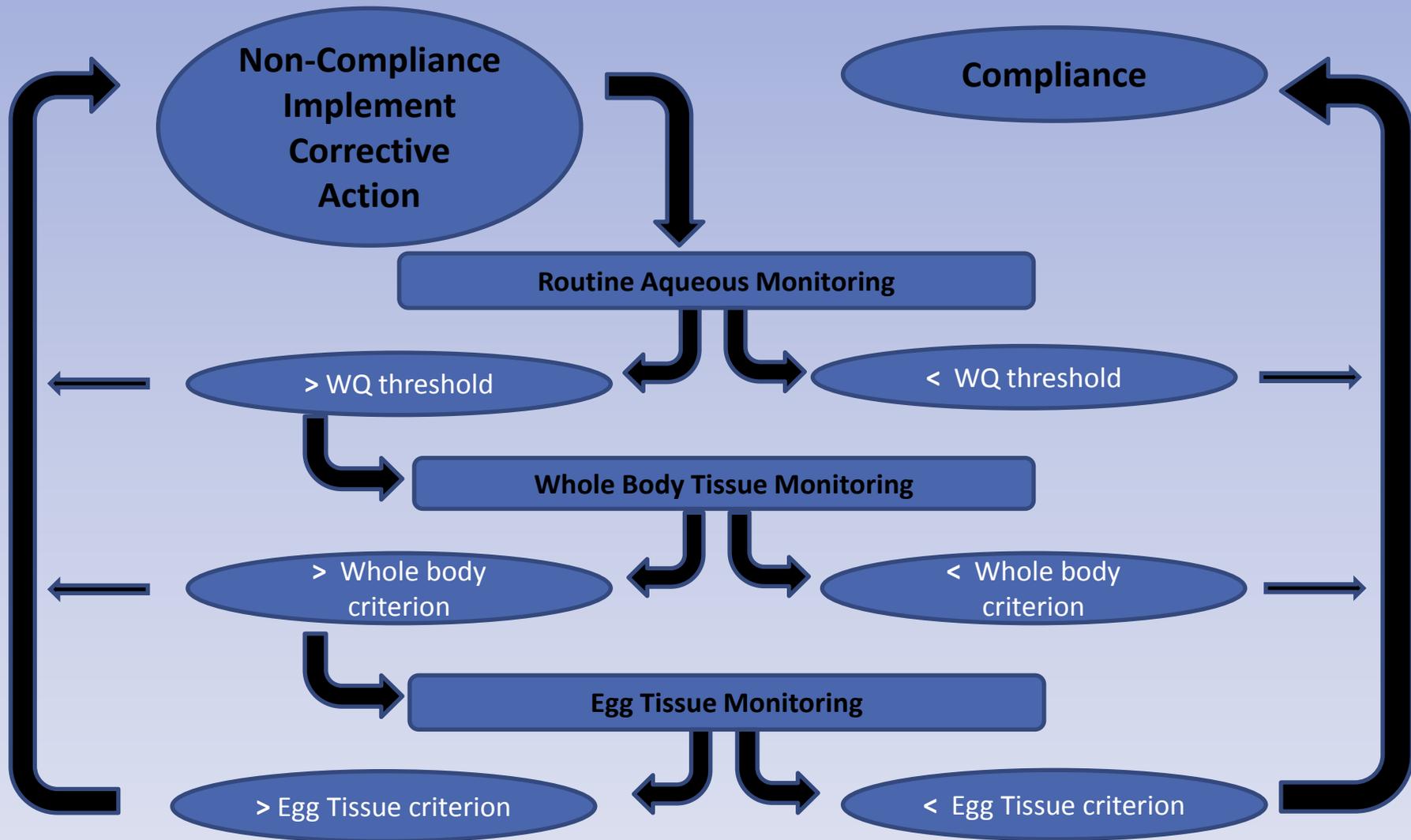
Derivation of Water Threshold using Empirical BAF Model

- $BAF_{egg} = \frac{C_{WB\ tissue} * CF}{C_{water}}$
 - $C_{WB\ tissue}$ = concentration of selenium in whole body tissues (milligrams per kilogram dw weights)
 - C_{water} = dissolved concentration of selenium in water (ug/L)
 - CF = Whole body to egg conversion factor (1.46)
- $C_{water\ threshold} = \text{Egg Criterion (19.9 mg/kg dw)} / \text{Median } BAF_{egg}$

Proposed Criteria

Media Type	Fish Tissue ¹		Water Column ⁴⁵	
Criterion Element	Egg/Ovary ²	Fish Whole Body ³	Monthly Average Exposure	Intermittent Exposure ⁷
Magnitude	19.9 (mg/kg dw) egg	13.63 (mg/kg dw) whole body	13.55 (µg/L) in lotic aquatic systems	$WQC_{int} = WQC_{30day} - C_{background}(1 - f_{int}) / f_{int}$
Duration	Instantaneous measurement	Instantaneous measurement	30 days ⁶	Number of days/month with an elevated concentration
Frequency	Not more than once in three years on average	Not more than once in three years on average	Not more than once in three years on average	Not more than once in three years on average

Implementing Site Specific Criterion





Thanks for Listening

Questions/Comments?

Additional Material

EFs Drive the Model

- Presser and Luoma (2010) define EF as a partition descriptor for selenium from the aqueous to particulate fractions (e.g., algae, detritus, and sediments).

$$EF = C_{particulate} / C_{water}$$

$C_{particulate}$ = selenium concentration in algae (periphyton), detritus, and/or sediments

C_{water} = selenium concentration in surface water (dissolved concentration)

TTFs

- $TTF_{invertebrate} = C_{invertebrate} / C_{particulate}$
 - $C_{particulate}$ for benthos from this Site derived as: 10% sediment Se concentration plus 90 % algae Se concentration for each location.
 - Allowed for a derivation of $TTF_{invertebrate}$ for each location.
- $TTF_{sculpin} = C_{sculpin} / C_{invertebrate}$
 - $C_{sculpin}$ - mean concentration of Se in sculpin tissues from each location
 - $C_{invertebrate}$ - concentration of Se in invertebrates for each location.
- $TTF_{trout} =$
 $C_{trout} / (0.5 \times C_{sculpin}) + (0.5 \times C_{invertebrate})$
 - C_{trout} = mean selenium concentration in brown trout from a location and time period
 - $C_{sculpin}$ = mean selenium concentration in sculpin (mg/kg dw) from the same location and time period
 - $C_{invertebrate}$ = selenium concentration in benthic invertebrates (mg/kg dw) from the same location and time period

TTF composite

$$TTF_{composite} = TTF_{trout} \times TTF_{sculpin} \times TTF_{invertebrate}$$

- TTF trout derived to account for the diet of brown trout
- Literature indicates a mixed diet of invertebrates and fish

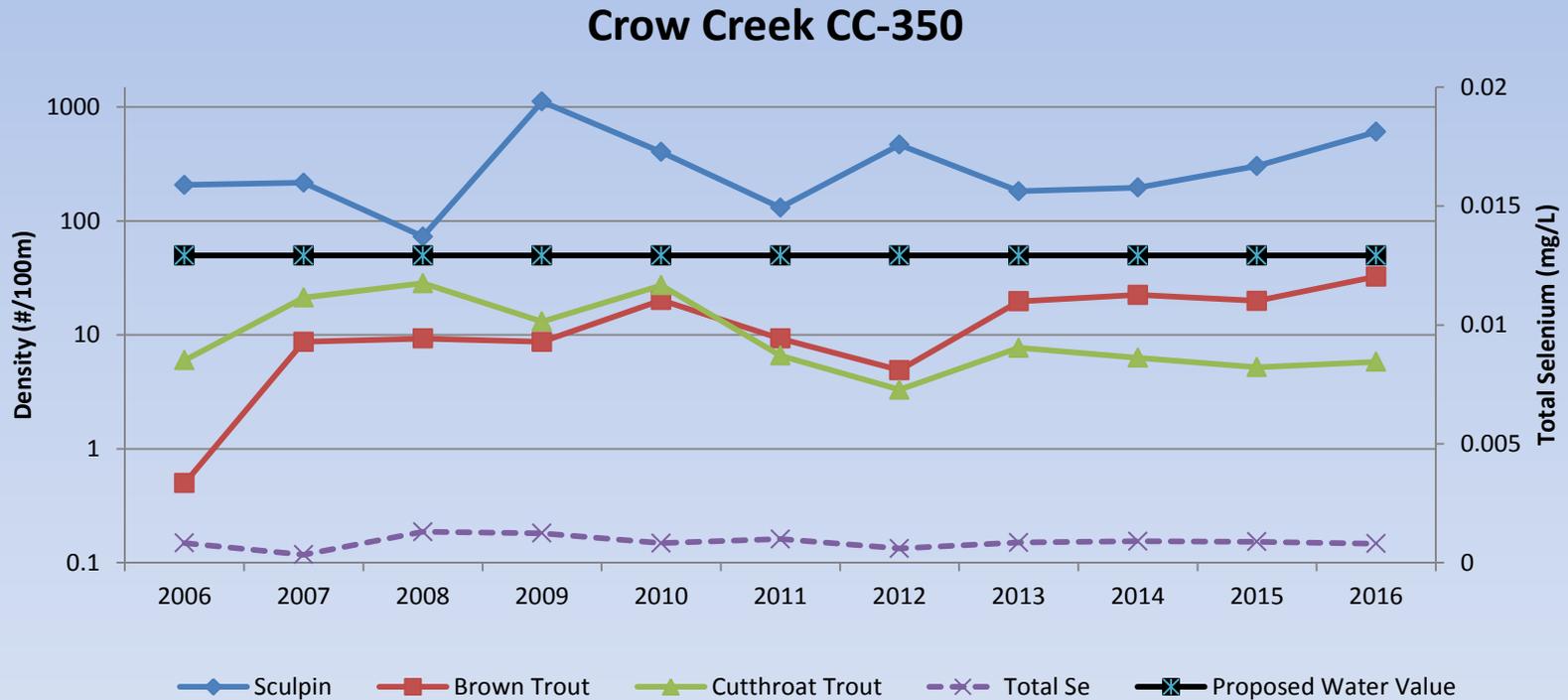
Mechanistic Trophic Model vs Empirical BAF Model

Data Grouping	Variables						Mechanistic Model Predicted Selenium Concentration in water ($\mu\text{g/L}$)	Empirical BAF Predicted Selenium Concentration in water ($\mu\text{g/L}$)
	EF	TTF _{invert}	TTF _{sculpin}	TTF _{trout}	TTF _{comp}	CF	Egg Criterion = 19.9 mg/kg dw	Egg Criterion = 19.9 mg/kg dw
Site Streams, all seasons	0.48	1.89	1.08	1.08	2.20	1.46	12.99	12.34
Site Streams, summer/fall seasons	0.43	2.05	1.09	1.08	2.43	1.46	13.20	13.28
Hoopes Spring, all seasons	0.43	1.20	1.55	1.21	2.25	1.46	14.22	16.77
Sage Creek, all seasons	0.46	1.91	0.86	0.97	1.59	1.46	18.87	16.32
Crow Creek, all seasons	0.91	2.61	1.09	1.10	3.14	1.46	4.81	4.01
South Fork Sage Creek, all seasons	0.27	2.00	1.47	0.89	2.61	1.46	19.61	14.99
Hoopes Spring, summer/fall seasons	0.40	1.50	1.47	1.21	2.66	1.46	12.98	19.00
Sage Creek, summer/fall seasons	0.39	1.98	0.84	0.97	1.60	1.46	22.10	16.88
Crow Creek, summer/fall seasons	0.67	2.49	1.12	1.18	3.28	1.46	6.21	4.85
South Fork Sage Creek, summer/fall seasons	0.27	2.00	1.47	0.89	2.61	1.46	19.61	14.99

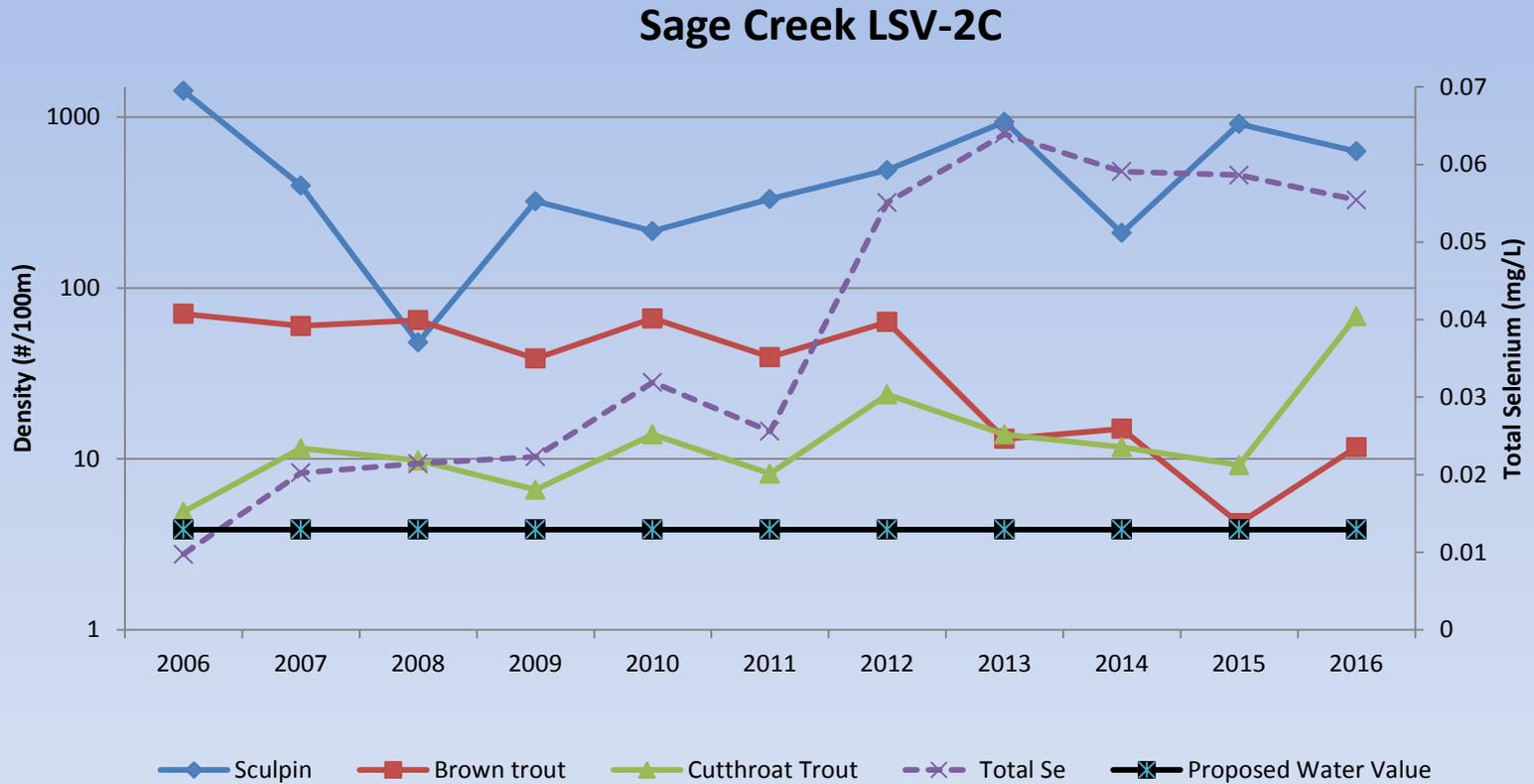
Supporting Evidence

- Multiple age classes of brown trout are present immediately downstream of Hoopes Spring, at LSV-2C, where selenium concentrations in diet and aqueous media are substantially elevated.
- Trout populations (both brown and YCT) in Sage Creek and Crow Creek downstream of Hoopes Spring are productive compared to regional averages. For example, location LSV-2C exceeds the 95th percentile catch per unit effort for Ecoregion 6 streams.
- Compared to historical trout population data from 1979, 1981, 1986, 1987, and 1999, trout population estimates in Sage Creek from 2006 and 2010 fall within the range of estimates collected prior to mining and those collected about 10 years after mining commenced.

Fish Population Density vs Total Selenium in Water through Time



Fish Population Density vs Total Selenium in Water through Time



Fish Population Density vs Total Selenium in Water through Time

Crow Creek CC-1A

