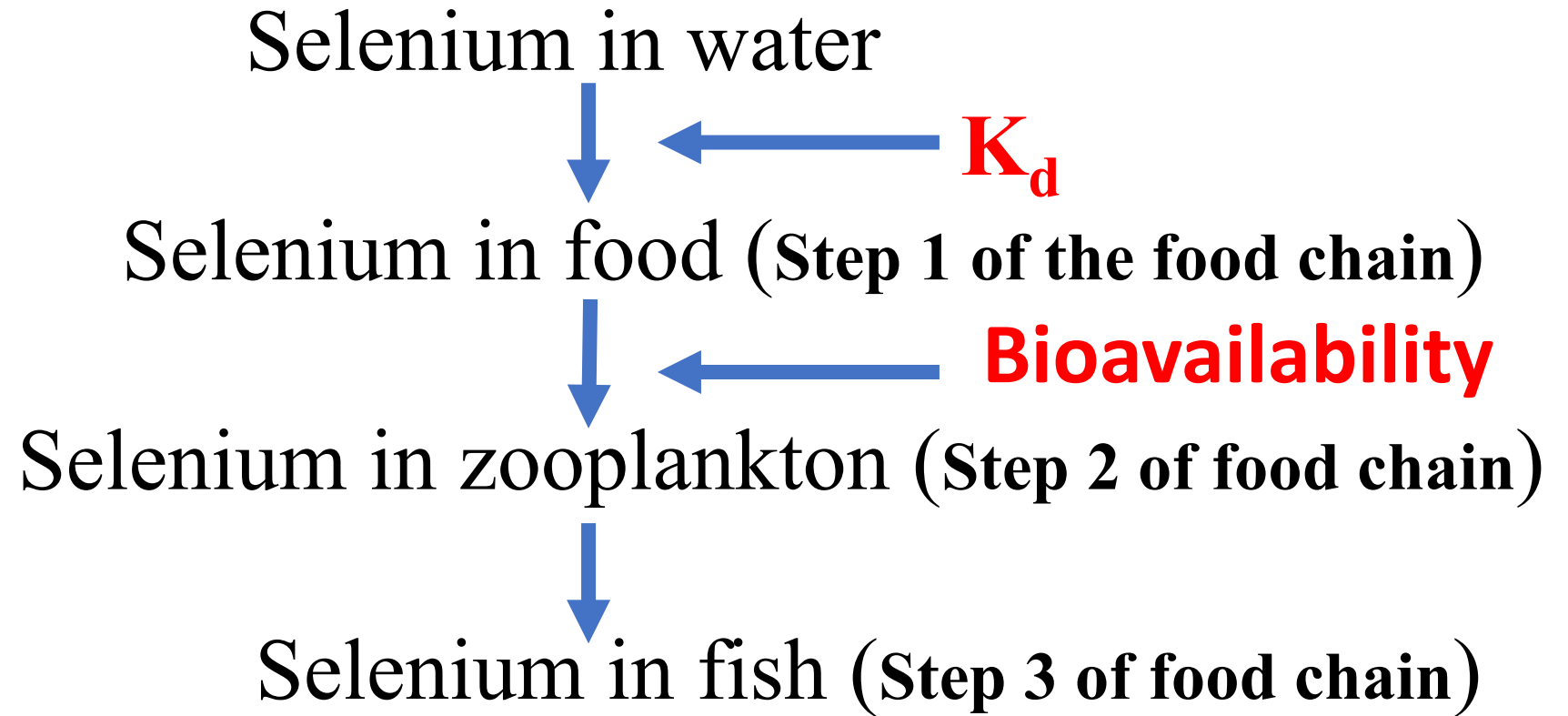
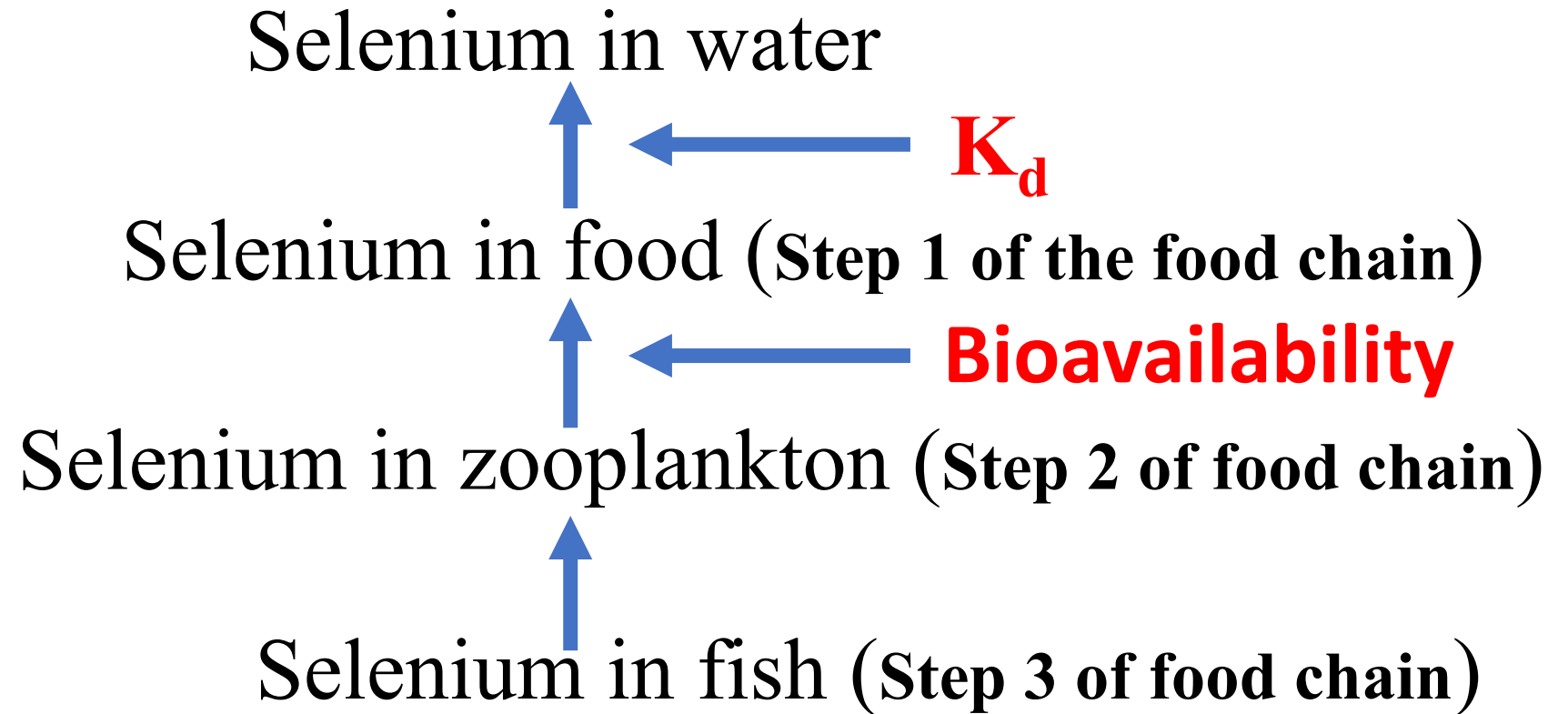


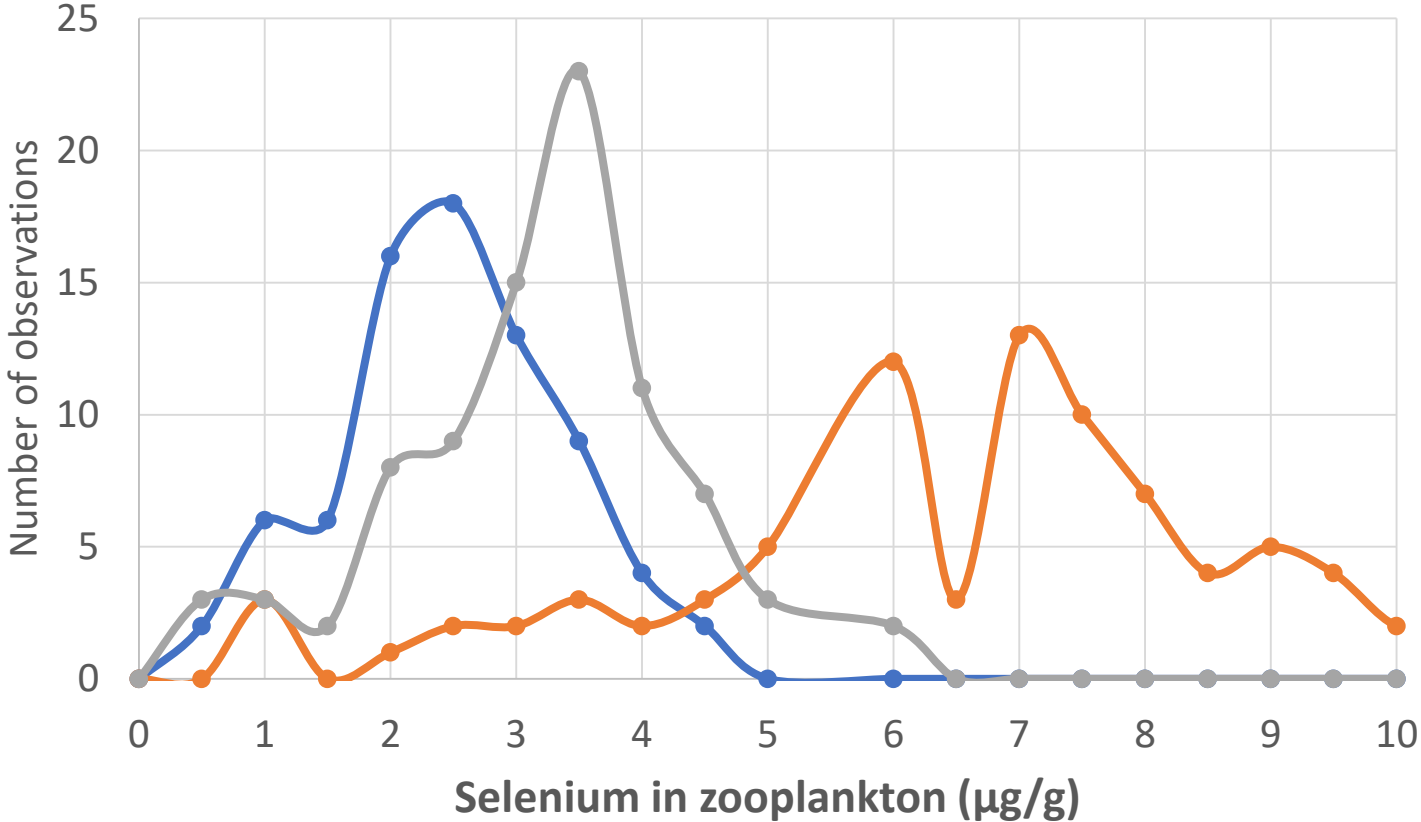
Model Se in food web



Derive Se standard for water column



Observed versus Predicted selenium in Zooplankton: All water and food data

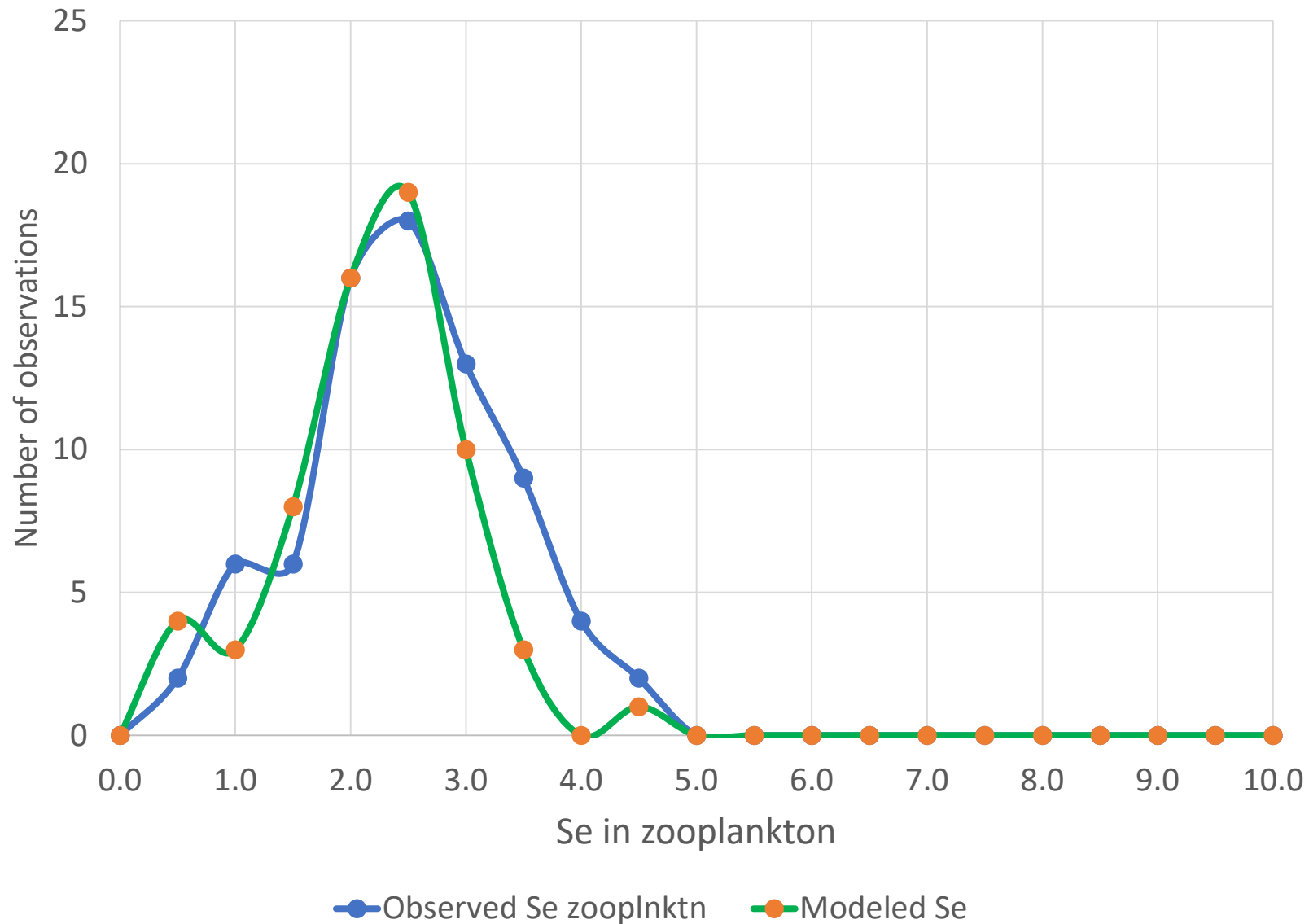


● Observe in Lake K.

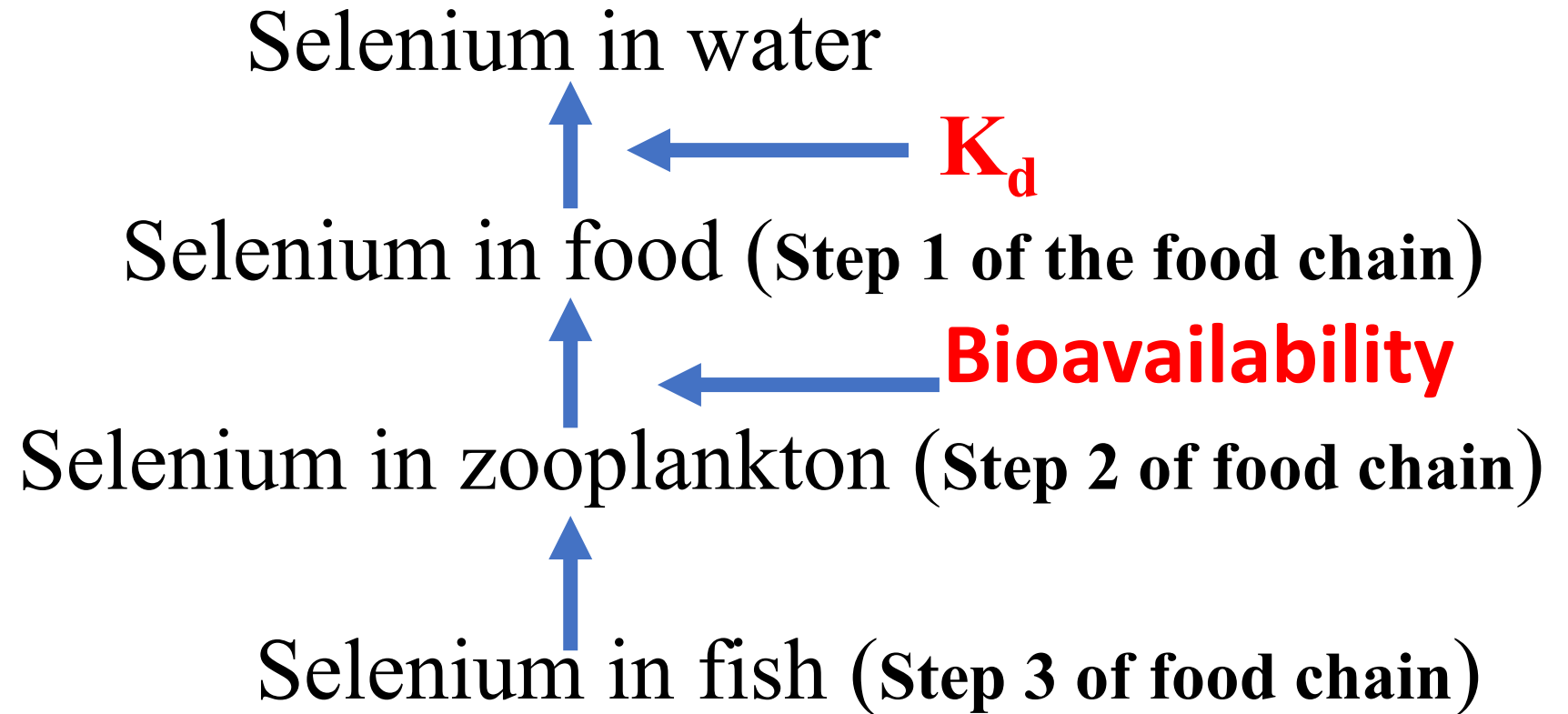
● Predict: 100% Bioavailability

● Predict: 45% bioavailability

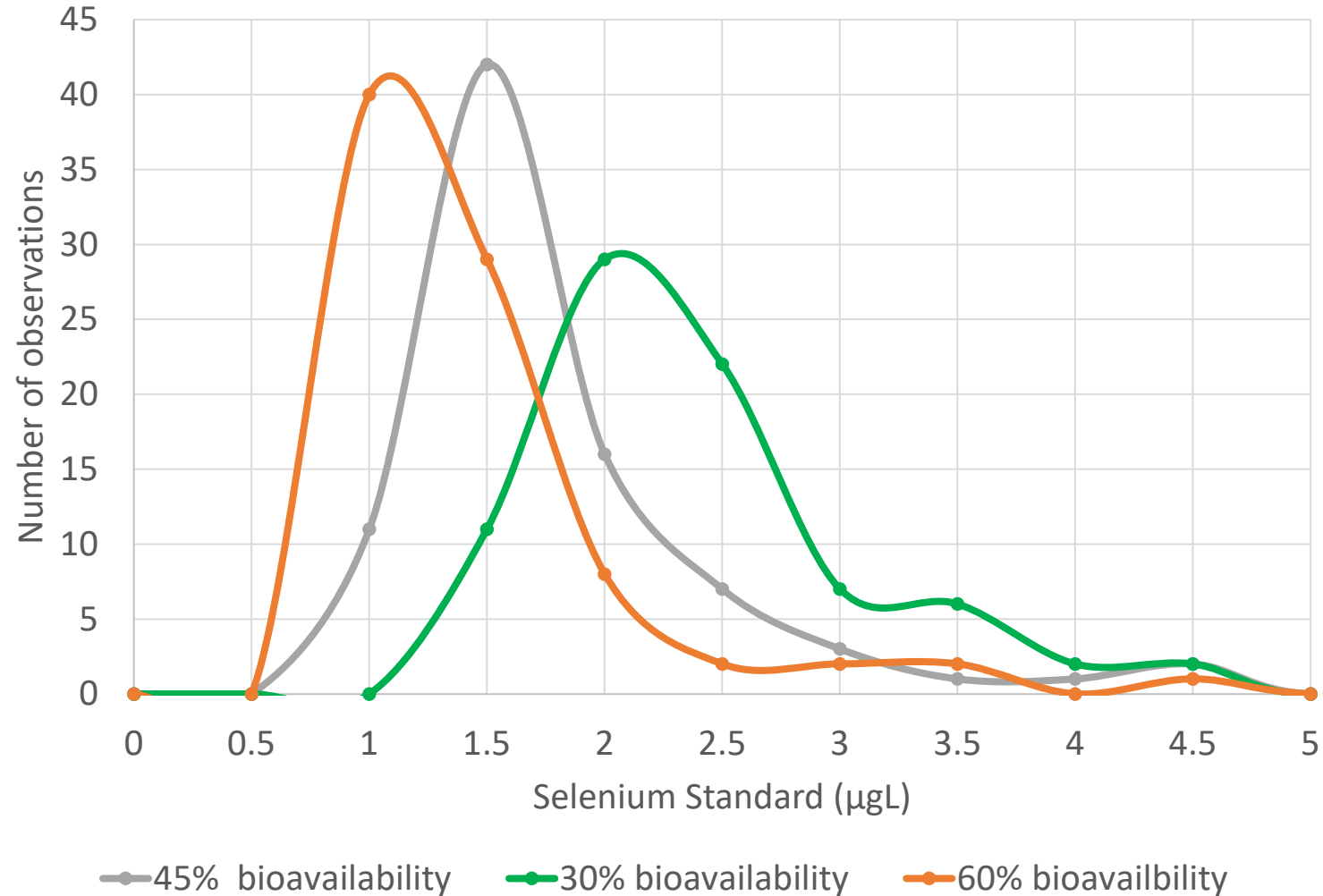
Observed versus Predicted selenium in Zooplankton: 30% Bioavailability



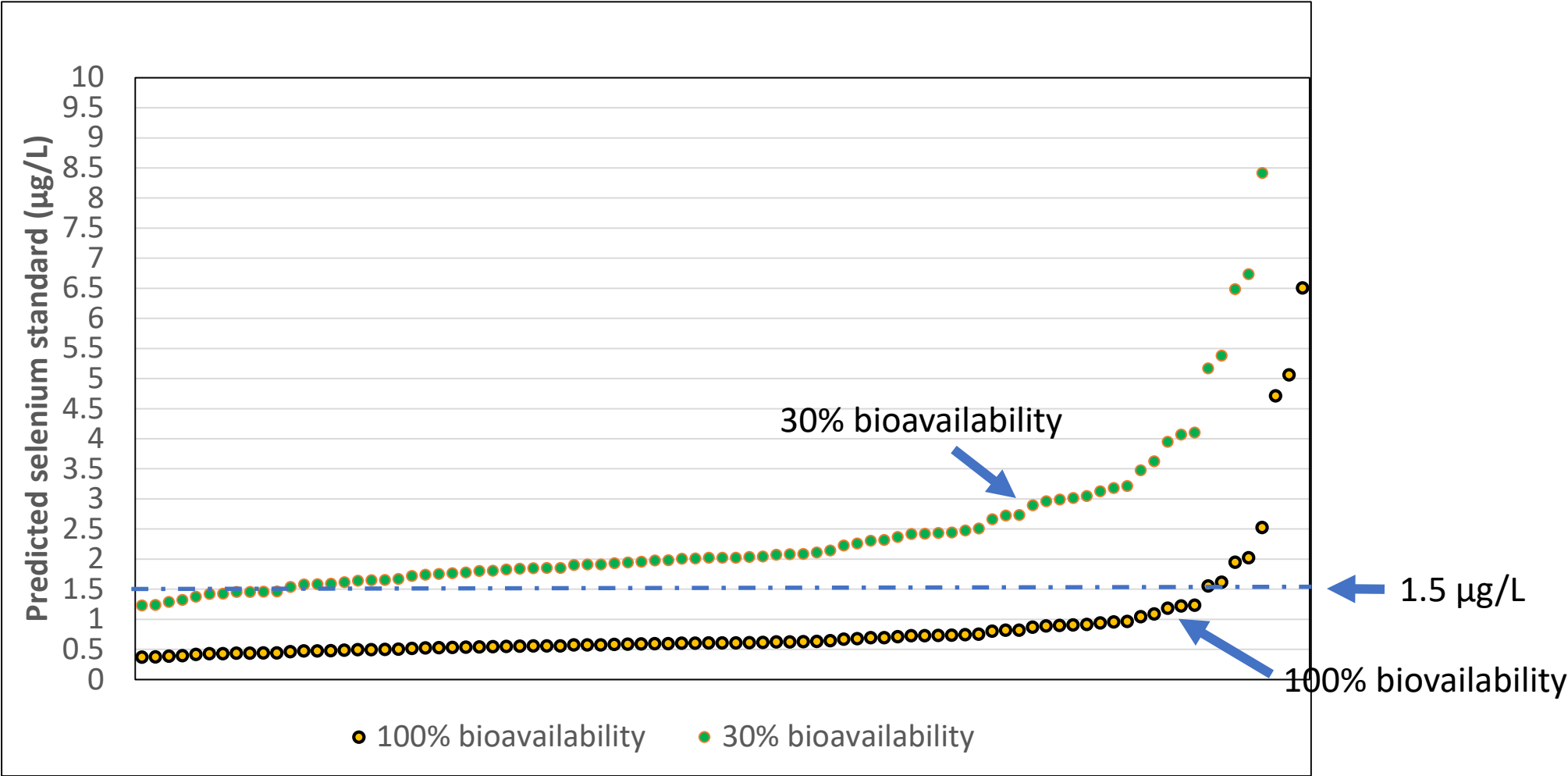
Derive Se standard for water column



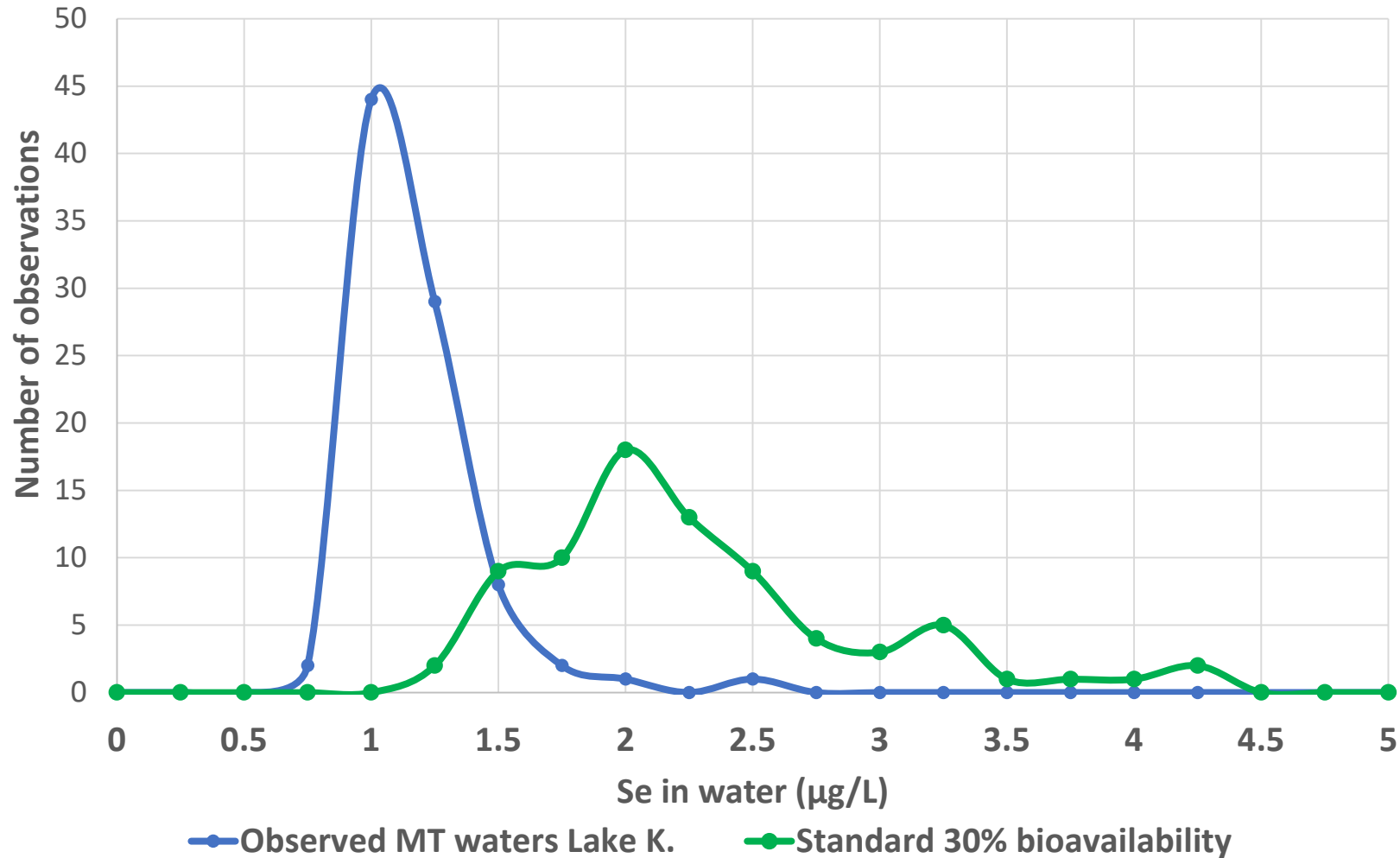
Selenium standard derived from model using different choices of bioavailability and all particle/water ratios (Kd's)



The range of model-predicted selenium standards across 86 water and particulate ratios (Kd's) from Lake Koocanusa, comparing the MDEQ model (MDEQ presentation slide 16) to the calibrated value of 30% bioavailability.



Compare observed Se in MT waters to standard derived at 30% bioavailability using all SPM/water data in Presser and Knapf.



Comparing Tissue Thresholds: Juggled multiple coefficients

Scenario	Whole body tissue threshold (mg/kg dw)	Diet	TTF Fish	TTF Aquatic Insects	TTF Zoo-plankton	Bio-availability	Kd percentile	Predicted dissolved water column Se ($\mu\text{g/L}$)
1	5.6	100% Aquatic Insects	1.1	2.8		45%	50th (median)	0.89
2	5.6	75% Aquatic Insects/ 25% Zooplankton	1.1	2.8	1.5	45%	50th (median)	0.91
3	5.6	100% Aquatic Insects	1.1	2.8		45%	50th (median)	0.8
4	8.5	100% Aquatic Insects	1.1	2.8		60%	75th	0.8

model outcomes

“The recommendations as to which Kd percentile to select was reliant upon the level of conservatism incorporated into *other* model parameters, particularly the whole body tissue criterion.”

“There was overall agreement that if applying a lower (more conservative) whole body value, then a median (less protective) Kd *would be protective of the beneficial use*. However, if a less conservative whole body value was used, such as the 8.5 mg/kg, *then a more protective percentile from the distribution would be recommended to ensure adequate protection*.”

Juggling model parameters to achieve a desired standard is not best practice in a science-based (model-derived) approach to deriving a standard.

CONCLUSIONS

- Model outcomes are the product of choices among data representations and model coefficients. Site-specific models must be calibrated to the site of interest.
- MDEQ (2020) presented two alternative models that resulted in the 0.8 $\mu\text{g/L}$ standard.
 - One did not consider the model coefficients best calibrated to field data.
 - **That model consistently over-predicted selenium in zooplankton, benthos and fish in the lake.**
 - The other juggled coefficients to yield the same results as the first approach.

Conclusions

- Outcomes based upon best modeling practices would not have unanimously supported the choice of 0.8 $\mu\text{g/L}$ as a standard.
- **The chosen coefficients all yielded lower aqueous standards than would coefficients best justified by a calibrated model.**
- **It is inappropriate to suggest the choice of a standard was supported by the selenium bioaccumulation model, as was implied by the model's prominent position in the MDEQ (2020) guidance document.**

Selenium standard derived from model using different choices of bioavailability and all particle/water ratios (K_d 's)

