

Revised Manuscript [12 February 2026] – Updated Zinc BLM for Freshwater Water Quality Criteria

1 **AN UPDATED UNIFIED ZINC BIOTIC LIGAND MODEL FOR PROTECTION OF**
2 **FRESHWATER AQUATIC LIFE AND ITS APPLICATION FOR SITE-SPECIFIC**
3 **WATER QUALITY OBJECTIVES**

4

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AUTHOR CONTRIBUTION

16 **Adam C. Ryan:** Conceptualization; data curation; formal analysis; investigation; methodology;

17 visualization; writing-original draft; writing-review & editing; **Robert C. Santore:**

18 Conceptualization; writing-original draft; writing-review & editing; **Kenneth C. Schiff:**

19 Conceptualization; writing-original draft; writing-review & editing.

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27 The authors declare no conflicts of interest.

28 **DISCLAIMER**

29 No disclaimer

30 **DATA ACCESSIBILITY STATEMENT**

31 All data used in this evaluation are publicly available and can be accessed in the supplementary
32 materials or can be provided by the authors. All tools used in this evaluation (i.e., blm_245.exe
33 provided with BLM Research Version 3.41.2.45; PEST Version 15; R Version 4.2.1) are
34 publicly available. Please contact corresponding author Adam Ryan with data requests
35 (acryan@zinc.org).

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5 **ABSTRACT**—A unified biotic ligand model (BLM) was developed to predict acute Zn toxicity
6 to four invertebrates and two fish, and chronic toxicity to three invertebrates and a fish.
7 Developed using a comprehensive ecotoxicity database, this unified BLM represents the first
8 update to the unified Zn BLM in nearly 14 years. For comparative purposes, a unified Zn
9 multiple linear regression (MLR) model was also developed. Both models are unified because
10 they each use a single set of parameters to characterize the effects of toxicity modifying factors
11 (e.g., pH, dissolved organic carbon [DOC], and major ions) on acute and chronic Zn toxicity.
12 While both models were capable of accurately predicting Zn toxicity, the unified BLM
13 performed marginally better based on quantitative model performance scores (MPS) and
14 qualitative single-variable pH and DOC evaluations. The unified Zn BLM, which also performed
15 better than the U.S. Environmental Protection Agency’s hardness equation, was then used to
16 normalize separate acute and chronic species sensitivity distributions (SSDs) to develop acute
17 and chronic 5th percentile hazardous concentrations (HC5s) analogous to USEPA’s aquatic life
18 ambient water quality criteria (WQC). The unified Zn BLM-based WQC were shown to be
19 protective of threatened and endangered species in California and appear to be protective of
20 chemosensory endpoints for salmonids. Using monitoring data for California as a test case,
21 chronic unified BLM-based WQC were lower than hardness-based WQC in 77% of samples, yet
22 fewer WQC exceedances were observed. Implementation of the Zn BLM for site-specific water
23 quality objectives (SSWQOs) using the fixed monitoring benchmark (FMB) approach indicates

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24 that for the California dataset, dry weather and wet weather samples should be considered
25 separately to develop SSWQOs for each condition.

26 **KEY WORDS**

27 Zinc, Bioavailability, Biotic Ligand Model , Water Quality Criteria, Implementation

28 **INTRODUCTION**

29 The bioavailability and toxicity of zinc (Zn) in freshwater systems are influenced by
30 multiple water chemistry characteristics. However, current U.S. Environmental Protection
31 Agency (USEPA) acute and chronic ambient water quality criteria (WQC) for Zn are adjusted
32 solely as a function of water hardness. This approach reflects recognition of hardness as a
33 toxicity-modifying factor (TMF; e.g., USEPA 1987; Spry and Wood 1989; Hogstrand et al.
34 1998), but it does not account for several additional water chemistry variables now known to
35 influence Zn bioavailability. Since the development of the existing hardness-based WQC
36 equations in the late 1980s (USEPA 1987, 1996), nearly four decades of research have expanded
37 understanding of the roles of pH, dissolved organic carbon (DOC), and major ions in modifying
38 Zn toxicity.

39 Numerous laboratory studies demonstrate that DOC can significantly reduce Zn
40 bioavailability by complexing dissolved Zn and limiting uptake at biological surfaces. Across a
41 range of taxa, Zn effect concentrations (EC_x, where x denotes the effect level) generally increase
42 by approximately 1.5- to 3-fold as DOC concentrations increase from <1 mg/L to >10 mg/L
43 (e.g., Heijerick et al. 2003, 2005; Hyne et al. 2005; Bringolf et al. 2006; Clifford and McGeer
44 2009; Hoang and Tong 2015). The magnitude of DOC effects appears to increase at
45 concentrations above approximately 6 mg/L, which are common in many freshwater systems,
46 including wetlands and forested watersheds (Liu and Wang 2022). Collectively, these results

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47 indicate that reliance on hardness alone can mischaracterize Zn bioavailability under
48 environmentally relevant conditions.

49 The influence of pH on Zn toxicity is more variable and appears to depend on species,
50 exposure duration, and interactions with other water chemistry characteristics. Acute Zn toxicity
51 has been reported to either decrease with increasing pH or remain relatively constant across
52 moderate pH ranges, while chronic toxicity is generally less responsive to pH, particularly in
53 waters with >5 mg/L DOC (Cusimano et al. 1986; Schubauer-Berigan et al. 1993; Heijerick et al.
54 2002, 2003; Hyne et al. 2005; Hoang and Tong 2015). These apparent differences in responses
55 on the basis of dissolved Zn underscore the importance of considering pH in conjunction with
56 other TMFs, rather than as an isolated predictor of toxicity.

57 In contrast, the ameliorative effects of major cations on Zn toxicity are well established.
58 Calcium (Ca), magnesium (Mg), and sodium (Na) consistently reduce Zn bioavailability through
59 competitive interactions at biological uptake sites, with Ca generally exerting the strongest
60 influence (Heijerick et al. 2002; De Schamphelaere and Janssen 2004; Clifford and McGeer
61 2009). Potassium (K) has not been shown to provide similar protection. The combined effects of
62 these cations form the mechanistic basis for hardness adjustments, but their individual
63 contributions and interactions with other TMFs are not fully captured by hardness alone.

64 Recognizing the limitations of hardness-based criteria, several approaches have been
65 developed to incorporate multiple TMFs into Zn WQC derivation, including the water-effect
66 ratio (WER) method (USEPA 1994; Diamond et al. 1997), the biotic ligand model (BLM; Di
67 Toro et al. 2001; Santore et al. 2002; Heijerick et al. 2002; DeForest and Van Genderen 2012),
68 and multiple linear regression (MLR) models (e.g., Brix et al. 2021; DeForest et al. 2023). While
69 WERs can provide site-specific adjustments, their cost and sensitivity to reference water

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70 selection limit widespread application. In contrast, BLMs and MLR models provide cost-
71 effective, science-based alternatives that explicitly incorporate key water chemistry drivers of
72 metal bioavailability.

73 For Zn, several BLMs have been developed, beginning with separate acute models
74 (Santore et al. 2002; Heijerick et al. 2002) and later expanding to include chronic applications.
75 DeForest and Van Genderen (2012) demonstrated that a single unified Zn BLM, using one set of
76 biotic ligand parameters, could successfully predict both acute and chronic ECx values across a
77 range of water chemistries. More recently, DeForest et al. (2023) developed separate acute and
78 chronic Zn MLR models and corresponding BLMs using an expanded ecotoxicity database and
79 demonstrated that both modeling approaches outperformed hardness-based criteria. However,
80 despite the substantial growth of the underlying database since development of the unified Zn
81 BLM in DeForest and Van Genderen (2012), unified BLM or MLR models were not evaluated in
82 that effort.

83 Several considerations provide strong motivation for revisiting and updating a unified Zn
84 BLM. First, the unified Zn BLM has not been updated in more than a decade, during which time
85 >100 additional Zn ECx values have become available, substantially expanding the database
86 supporting its development. Second, from a mechanistic perspective, the influence of water
87 chemistry on Zn bioavailability is not expected to depend on exposure duration associated with
88 acute vs. chronic exposures. The fundamental processes governing Zn bioavailability in the BLM
89 framework (i.e., speciation and competition with major cations) are shared across acute and
90 chronic exposures, suggesting that separate models for different effect durations may be
91 conceptually unnecessary. Third, unified models offer practical advantages for environmental
92 assessment and management, including reduced implementation complexity and avoidance of

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93 internal inconsistencies (e.g., chronic hazardous concentrations exceeding acute values) that can
94 arise when separate models are applied across diverse water chemistries. Finally, unified BLMs
95 have been successfully developed and applied for other metals, including copper (USEPA 2007;
96 ECCC 2019) and nickel (B.C. Ministry of Water, Land, and Resources Stewardship 2024),
97 demonstrating the feasibility and regulatory utility of a single-model approach.

98 In parallel with model development, the adoption of bioavailability-based WQC
99 highlights the need for clear implementation frameworks to translate time-variable criteria into
100 site-specific water quality objectives (SSWQOs). The fixed monitoring benchmark (FMB; Ryan
101 et al. 2018) approach provides a robust method for applying BLM- or MLR-based criteria using
102 routine monitoring data in a manner consistent with USEPA (1985). Importantly, many
103 implementation challenges are shared across modeling approaches. Although MLR models offer
104 simplicity and ease of incorporation into regulatory standards, application of separate acute and
105 chronic MLR-based criteria has led to implementation challenges in some jurisdictions,
106 including cases where acute criteria are numerically lower than chronic criteria across wide
107 ranges of water chemistry conditions (e.g., Washington State Department of Ecology 2024).
108 Such issues are less likely to arise with unified modeling frameworks.

109 Biotic ligand models also offer several advantages for implementation, including
110 mechanistic treatment of interacting TMFs, applicability across media, and the ability to support
111 forensic evaluations of bioavailability drivers in complex exposure scenarios. Recent advances
112 have further streamlined BLM application by reducing input requirements to a subset of
113 commonly measured parameters (e.g., pH, DOC, and hardness; Windward 2019) and enabling
114 deployment within open-source computational environments (e.g., the {BLMEngineInR}
115 package; Santore and Croteau 2025). These developments are anticipated to facilitate broader

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116 adoption by regulatory agencies and the regulated community thereby improving transparency in
117 decision-making.

118 The present study updates the unified Zn BLM originally developed by DeForest and
119 Van Genderen (2012) using an updated comprehensive ecotoxicity database and evaluates its
120 application for derivation and implementation of Zn WQC. For comparative purposes, a unified
121 Zn MLR model was also developed using methods consistent with DeForest et al. (2023). The
122 objectives of this work were to: (1) develop an updated unified Zn BLM applicable to both acute
123 and chronic exposures; (2) develop a unified Zn MLR model for comparison; (3) apply the
124 unified Zn BLM in a manner consistent with USEPA guidelines for WQC development (USEPA
125 1985); and (4) demonstrate an implementation approach for BLM-based SSWQOs using
126 monitoring data from California.

127 **MATERIALS AND METHODS**

128 *Toxicity database*

129 We regularly maintain and update a comprehensive Zn ecotoxicity database to provide a
130 resource that can be used for ecological risk assessment and to support regulatory jurisdictions
131 during development of water quality criteria/guidelines/objectives. The data used in the current
132 study (Table S1) is a subset of the parent database and is consistent with the data used by
133 DeForest et al. (2023). With the exception of removing 11 observations from the acute dataset
134 for *O. mykiss* which were inconsistent with the other data (i.e., immobilization endpoint, and fish
135 age/size of 1 day post hatch or ≤ 0.1 g]), all changes since publication of DeForest et al. (2023)
136 involved adding water chemistry data or making estimates for missing BLM inputs. These
137 changes generally affected the data used for development of species sensitivity distributions
138 (SSDs) because information for each BLM input was needed for development of the acute and

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139 chronic BLMs described by DeForest et al. (2023). Because the focus of this application was to
140 derive BLM-based WQC, this analysis focused on toxicity data that met USEPA (1985)
141 guidelines for WQC development.

142 While our ecotoxicity database is comprehensive due to the inclusion of all types of
143 reported ECx (e.g., no observed effect concentrations [NOECs], lowest observed effect
144 concentrations [LOECs], maximum acceptable toxicant concentrations [MATCs], 10%
145 inhibitory/effect/lethal concentrations [IC/EC/LC10s], 20% inhibitory/effect/lethal
146 concentrations [IC/EC/LC20s], 50% inhibitory/effect/lethal concentrations [IC/EC/LC50s], etc.),
147 exposure durations, and organism life stages, the data were curated and screened appropriately
148 for the two components of WQC development. As in DeForest et al. (2023), data for refinement
149 of the Zn BLM were constrained to acute and chronic toxicity data that represented consistent
150 effect levels (i.e., 50% effect for acute and generally 20% effect level or MATC for chronic),
151 exposure durations, and life stages. Additionally, for Zn BLM refinement, only those organisms
152 for which Zn toxicity was evaluated over a sufficient range of water chemistry conditions were
153 considered (i.e., as described in Brix et al. [2017]).

154 In contrast to the data subsets used to refine the Zn BLM, the data used to develop the
155 SSDs were less constrained, while still generally meeting USEPA (1985) guidelines for WQC
156 development (see DeForest et al., (2023) for details and exceptions). In short, only acute toxicity
157 data expressed as LC50s or EC50s from 48- to 96-h exposures (some exceptions for species-
158 specific exposure duration) and chronic toxicity data from life cycle exposures for invertebrates
159 and early life stage, partial life cycle, or full life cycle exposures for fish were considered for
160 SSD development. Chronic data expressed as EC20s were preferentially used, although chronic
161 values such as MATC, LOEC, and NOEC were considered in lieu of EC20s for relatively

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162 insensitive organisms. Although algae and aquatic plants are not directly incorporated into
163 calculation of USEPA's WQC (USEPA 1985), they are considered in the criteria development
164 process (via an evaluation of the Final Plant Value). The ecotoxicity database (Table S1)
165 includes studies on algae and aquatic plants to support this evaluation and to be consistent with
166 other jurisdictions that directly consider plant data in setting WQC.

167 ***Estimating missing BLM inputs***

168 Many toxicity tests considered for BLM development and SSD development were
169 missing data for BLM inputs. For BLM calibration, toxicity tests with reported pH, hardness (or
170 Ca and Mg), and DOC were preferred, but to expand the scope of the dataset source water
171 information was used to make estimates where data were missing. Estimations of DOC from
172 source water were conducted according to Appendix C in USEPA (2007) or, in some cases,
173 using professional judgment based on water recipes or the source of the dilution water. For
174 example, in chronic tests with daphnids, DOC will increase with addition of food. If the DOC
175 concentration was reported only in the dilution water prior to testing, or if DOC was estimated
176 (e.g., for tests conducted in synthetic water), a DOC concentration of 2 mg/L was assumed in
177 chronic daphnid tests (Besser et al. 2021).

178 For toxicity tests with missing data for major ions (e.g., Ca, Mg, Na, K, SO₄, Cl, and
179 alkalinity), information about laboratory dilution waters was used to estimate concentrations.
180 Laboratories generally use consistent water sources over time and often report enough
181 information to provide a reasonably complete picture of their exposure water conditions (e.g.,
182 USEPA Great Lakes Toxicology and Ecology Division Laboratory, USEPA Western Ecology
183 Division Laboratory, Colorado Parks & Wildlife Aquatic Toxicology Laboratory, USGS
184 Columbia Environmental Research Center). That type of information was used to fill data gaps

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185 prior to using the BLM to normalize ECx values for the SSDs. When alkalinity was not reported,
186 we assumed equilibrium with the atmosphere and estimated dissolved inorganic carbon
187 concentrations using pH and pCO₂.

188 Generally, we required that pH be reported, but five studies requiring pH estimates were
189 retained. Three of the studies (Carlson and Roush 1985; Norberg-King 1989; Sibley et al. 1996)
190 used Lake Superior water from the USEPA Duluth, MN laboratory as their dilution water, and
191 the other two studies (Cairns et al. 1978; Chadwick Ecological Consultants 2005) provided the
192 recipes for their dilution waters. Because these water types have been repeatedly characterized,
193 we were reasonably confident in estimating pH for these waters. In the database used for BLM
194 development and WQC derivation (Table S1), all estimates for missing BLM inputs are
195 indicated. All BLM calculations were performed with the collated reported and estimated values.
196 Table S2 provides a summary of how many estimates were made and describes the rationale for
197 the limited number of pH estimates.

198 Update of the unified Zn BLM

199 Consistent with the approach taken in DeForest et al. (2023) and recommended by Brix et
200 al. (2017), we used data for organisms tested over a minimum DOC range of 5 mg/L, a minimum
201 hardness range of 100 mg/L, and a minimum pH range of 1.5 pH units. For acute toxicity,
202 *Ceriodaphnia dubia*, *Daphnia magna*, *D. pulex*, *Oncorhynchus mykiss*, *Pimephales promelas*,
203 and *Pomacea paludosa* met these criteria. For chronic toxicity, *C. dubia*, *D. magna*, *Lymnaea*
204 *stagnalis*, *O. mykiss*, and *Raphidolcelus subcapitata* met these criteria. In DeForest et al. (2023),
205 acute and chronic BLMs were developed for individual species and then separate pooled acute
206 and pooled chronic models were developed. Here, the primary objective was to develop a unified

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207 BLM. However, given that there were some updates to the database, we also updated the species-
208 specific BLMs.

209 Parameter Estimation Software (PEST, Version 15; Doherty 2018) was used to develop a
210 unified set of BLM parameters for the BLM refinement dataset. The unified BLM was developed
211 with two permutations of the dataset: (1) all acute (EC50) and chronic (EC20) fish and
212 invertebrate data, (2) the same data considered in (1) except acute *P. promelas* data and chronic
213 *C. dubia* data were excluded. In the second permutation, the *P. promelas* and *C. dubia* data were
214 excluded because of excessive variability in observed ECx that could not be explained by
215 previous MLR models or BLMs (DeForest et al. 2023). Additionally, separate acute and chronic
216 species-specific BLM optimizations were performed to provide an indication of how much the
217 unified BLM differed from the species-specific models, and to provide direct comparisons to the
218 models described in DeForest et al. (2023).

219 The PEST program performs parameter optimization by an iterative, least squares
220 procedure, and provides a mechanism for objectively developing BLMs with optimum sets of
221 parameters, given the provided dataset and a set of user-developed instructions/constraints.
222 Conceptually, application of PEST for this purpose is analogous to using analysis of covariance
223 (ANCOVA) to develop a pooled MLR model. The difference is that the BLM executable is a
224 standalone software tool that must be run iteratively while interacting with PEST so that PEST
225 can determine the optimum set of BLM parameters that minimizes the difference between
226 predicted and observed ECx in the calibration dataset. To develop a unified BLM, we instructed
227 PEST to assign and optimize a consistent set of biotic ligand (BL) parameters (i.e., binding
228 strengths of bioavailable Zn species [e.g., Zn^{2+} and $ZnOH^+$] and competing cations at the BLs)
229 for acute and chronic effects for all organisms in the dataset simultaneously.

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230 The PEST optimization procedure was conducted with log₁₀-transformed dissolved Zn
231 ECx. Only the BL parameters and the critical accumulation level of Zn at the BL were optimized
232 using PEST. During each iteration of PEST, log₁₀-transformed predicted ECx are compared
233 with the corresponding log₁₀-transformed observed ECx and based on the residual error of the
234 predictions, PEST makes subsequent changes to the BL parameters until the prediction error is
235 minimized. For all PEST optimizations, the thermodynamic database specifying the bulk
236 solution chemical reactions was not modified and was identical to the thermodynamic database
237 provided with the BLM software (i.e., USEPA 2007, and [https://www.windwardenv.com/biotic-](https://www.windwardenv.com/biotic-ligand-model/)
238 [ligand-model/](https://www.windwardenv.com/biotic-ligand-model/)). Similarly, this optimization procedure did not modify any dissolved organic
239 matter reactions used by the BLM. All BLM calculations were performed using the BLM
240 executable (i.e., blm_245.exe which is distributed with the Biotic Ligand Model Windows®
241 Interface, Research Version 3.41.2.45 (Windward 2019). We used the ranges of BL log K values
242 identified in DeForest and Van Genderen (2012) to guide definition of the ranges over which
243 PEST would search for optimum BL log K values. The ranges for each log K were expanded by
244 one log unit at the lower and upper ends of the range. For example, the range of BL-Ca log K
245 values reported for BLMs in DeForest and Van Genderen (2012) was 3.2 to 4.9. Therefore, the
246 range we used for PEST optimizations (for all fish and invertebrates) was 2.2 to 5.9. Table 1
247 provides the ranges and starting values used for the PEST optimizations.

248 For all PEST optimizations, two of the BL parameters (BL-Zn and BL-H) were used to
249 anchor the optimization procedure and were therefore held constant in all optimizations. The BL-
250 Zn log K had a narrow range (5.3-5.6) in all BLMs summarized in DeForest and Van Genderen
251 (2012), so it was fixed at 5.4. To accommodate a pH effect, while including both BL-H and BL-

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252 ZnOH, the log K for BL-H was fixed at 6.4 (which is the mean value from literature, ranging
253 from 5.9-6.7, as summarized in DeForest and Van Genderen [2012]).

254 ***Development of a unified Zn MLR model***

255 For comparative purposes, a unified Zn MLR model was also developed using the BLM
256 development dataset described here. Given that pH, DOC, and hardness were identified as the
257 most important TMFs in the MLR models developed by DeForest et al. (2023), it was logical to
258 develop a unified Zn MLR model using those TMFs as independent variables. In a manner
259 consistent with developing an acute or chronic pooled MLR model, we used the combination of
260 species+endpoint (e.g., *C. dubia* Acute EC50, *D. magna* Chronic EC20, etc.) as the categorical
261 variable in the MLR model. The unified MLR model was fitted to the calibration dataset using
262 the `lm()` function in R (R Version 4.2.1; R Core Team 2022). The form of the model fitted was
263 the same as used by DeForest et al. (2023), where the dependent variable was $\ln(\text{EC}_x)$ and the
264 independent variables were pH, $\ln(\text{DOC})$, and $\ln(\text{hardness})$.

265 ***Model comparison***

266 The unified BLM and unified MLR model were compared in a manner consistent with
267 the approach used by DeForest et al. (2023). In short, plots of predicted vs observed EC_x, plots
268 of residuals vs. TMFs, and model performance scores (MPS) were used to qualitatively and
269 quantitatively evaluate model performance. For additional comparisons, these same evaluations
270 included predictions made by the unified BLM from DeForest and Van Genderen (2012), the
271 separate acute and chronic MLR models from DeForest et al. (2023), and the hardness equation
272 (USEPA 1996). The MPS calculation performed here (Equation 1) was modified slightly from
273 DeForest et al. (2023) to use an r^2 calculation (Equation 2) that corresponds to the variability
274 explained by the 1:1 line of perfect agreement on the predicted vs. observed plots (consistent

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275 with the MPS calculations in Besser et al. [2021]). For this calculation, SSR is the sum of squared
 276 residuals, SST is the total sum of squares, and i identifies the i th observation in the dataset. In this
 277 formulation, if the predictions agree exactly with the observations, the sum of squared residuals
 278 (SSR) = 0, so $r^2 = 1$, which is the desired case. Residual scores (RS_{pH} , RS_{DOC} , $RS_{Hardness}$) were
 279 calculated from the slopes of linear regressions of the residuals [i.e., $\log_{10}(\text{observed}$
 280 $ECx/\text{predicted } ECx)$] vs. pH, $\log_{10}(\text{DOC})$, and $\log_{10}(\text{hardness})$, respectively. The RS
 281 calculations are described by Equation 3, where s_i is the slope of the relationship with the i th
 282 independent variable, and p_i is the p-value associated with the i th slope. Finally, $RF_{x,2.0}$ is
 283 calculated by determining the fraction of the predictions that are within 2-fold of the observed
 284 ECx .

$$285 \quad MPS = \frac{r^2 + RF_{x,2.0} + RS_{pH} + RS_{DOC} + RS_{Hardness}}{5} \quad \text{Equation 1}$$

$$286 \quad r^2 = 1 - \frac{SSR}{SST} = 1 - \frac{\sum_i (\text{predicted } ECx_i - \text{observed } ECx_i)^2}{\sum_i (\text{observed } ECx_i - \text{mean observed } ECx)^2} \quad \text{Equation 2}$$

$$287 \quad RS_i = \frac{2}{(1 + 10^{|s_i \times (1 - p_i)|})} \quad \text{Equation 3}$$

288

289 Additionally, data from tests separately evaluating the effects of pH and DOC without
 290 varying other water chemistry conditions were used to qualitatively assess unified BLM and
 291 unified MLR model performance. For these evaluations, plots of predicted vs. observed ECx
 292 were used to assess model performance under conditions where either pH or DOC was the only
 293 variable. Additionally, observed ECx were plotted against either pH or DOC with simulated ECx
 294 representing predicted pH or DOC effects under the reported water chemistry conditions. These
 295 types of plots provide additional insight into predicted model behavior under varying TMF

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296 conditions. Appropriate data for these plots were available for either acute or chronic ECx for
297 several species (e.g., *C. dubia*, *D. magna*, *D. pulex*, *P. promelas*, *P. paludosa*, and *O. mykiss*).

298 *Ambient WQC*

299 Acute and chronic Zn HC5s were developed by incorporating BLM normalization into
300 the USEPA procedure for deriving WQC (USEPA 1985). Application of the Zn BLM for WQC
301 in the US is straightforward, and the approach has been described previously for Cu, Zn, and Pb
302 (USEPA 2007; DeForest and Van Genderen 2012; DeForest et al. 2017, respectively). After
303 selecting data appropriate for developing acute and chronic sensitivity distributions (described
304 above), the first step in determining the 5th percentiles of the genus sensitivity distributions (i.e.,
305 the final acute value [FAV] and final chronic value [FCV]) was to use the unified Zn BLM in
306 speciation mode to estimate the Zn critical accumulations for each ECx in the acute and chronic
307 WQC datasets. This step uses the reported/estimated water chemistry conditions associated with
308 each reported Zn ECx to estimate how much Zn would need to be present at the BL (i.e., the
309 critical accumulation) to result in the reported Zn ECx. For both the acute and chronic WQC
310 datasets, geometric mean critical accumulation values were calculated for each species. For the
311 acute WQC (i.e., criteria maximum concentration [CMC]) dataset, the resulting values were the
312 critical accumulations associated with the species mean acute values (SMAVs), and for the
313 chronic WQC (i.e., criteria continuous concentration [CCC]) dataset, they were the species mean
314 chronic values (SMCVs). Using the critical accumulations for the SMAVs and SMCVs, critical
315 accumulations associated with the genus mean acute values (GMAVs) and genus mean chronic
316 values (GMCVs) were calculated by determining the geometric means at the genus level.
317 Finally, the critical accumulations associated with the 5th percentiles of the GMAVs and GMCVs

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318 were used as the FAV and FCV critical accumulations, which can be used by the Zn BLM to
319 derive acute and chronic WQC under specified water chemistry conditions.

320 *Sensitivity of BLM and WQC to estimated inputs*

321 A sensitivity analysis was performed to evaluate the potential consequences of
322 uncertainty in estimated BLM inputs on optimized BL parameters and HC5 determination (see
323 details in Supplementary Text 1). This was accomplished by simultaneously increasing or
324 decreasing all estimated inputs by 1.25- to 2-fold to understand potential effects on optimized BL
325 parameters and HC5s. The choice of which factor to increase or decrease each estimated input
326 was driven by the standard deviations of TMF concentrations from reconstituted laboratory
327 waters with reported measured TMF concentrations. The joint probability of independent events
328 (Zar 1999) was calculated for each scenario to provide an indication of the likelihood of making
329 estimates that are either high or low by up to ~2 standard deviations based on the variation in the
330 type of data used to inform the estimates (e.g., data from related studies or from studies using
331 similar dilution waters).

332 *Application of the Zn BLM to California surface waters*

333 To demonstrate application of the unified Zn BLM, the model was applied to a dataset
334 compiled for California from data retrieved from the water quality portal (Water Quality Portal
335 2021). California was used as an example application because of interest from the State Water
336 Resources Control Board in using the BLM as an option for developing SSWQOs. All data were
337 screened to include only freshwater samples taken from rivers, streams, lakes, and reservoirs,
338 and data were retained only if sufficient information for BLM inputs was provided. Dissolved
339 inorganic carbon (DIC) concentrations were estimated from pH and alkalinity in samples for
340 which alkalinity was reported. For cases in which alkalinity was not reported, pH and

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341 atmospheric CO₂ partial pressure ($p\text{CO}_2 = 10^{-3.42}$) were used to calculate DIC. To evaluate the
342 effect of migrating from hardness-based to BLM-based WQC, BLM-predicted WQC and
343 hardness-based WQC were calculated for each sample and then hazard quotients (HQs) were
344 calculated as the quotient of reported Zn concentration divided by the calculated WQC. These
345 calculations were performed on a per sample basis. Therefore, each hazard quotient represents an
346 instantaneous indication as to whether the BLM- or hardness-based WQC was exceeded.

347 *Application of the Zn BLM to develop SSWQOs*

348 The unified Zn BLM and the fixed monitoring benchmark (FMB) approach (Ryan et al.
349 2018) were used with data collected from the Los Cerritos Channel to demonstrate how
350 SSWQOs could be developed for locations with time variable WQC. The data used for this
351 evaluation were provided by Richard Watson & Associates on behalf of the Los Cerritos
352 Channel Watershed Group and represented the freshwater portion of the Los Cerritos Channel
353 and several tributaries near Los Angeles, CA (Table S3). Zinc and Cu concentrations and all
354 necessary BLM inputs have been collected for the Los Cerritos Channel and 4 tributaries since
355 2018 in anticipation of BLM adoption by the state of California as statewide WQC or through
356 state provisions allowing the use of the BLM for SSWQOs (Richard Watson, Richard Watson &
357 Associates, Inc., personal communication, 18 January 2024). The dataset includes monitoring
358 data for routine compliance sampling (which occurs during dry weather), additional dry weather
359 sampling, and wet weather sampling. The data included in our analysis extend from 2018 to the
360 first quarter of 2023 and provide sufficient data for each site to calculate Zn BLM-based FMBs.
361 The Zn BLM was used to develop acute and chronic FMBs for various permutations of the
362 dataset (e.g., combining and separating wet and dry sampling events).

363 **RESULTS**

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364 ***Toxicity database***

365 The complete acute and chronic toxicity database considered in this evaluation is
366 provided in Table S1 (n = 998 observations). The database includes test details and identifies all
367 observations used in the development of the current unified Zn BLM, as well as the observations
368 used to develop the genus sensitivity distributions (GSDs) for HC5 calculations. To transparently
369 indicate cases for which estimates were made for BLM inputs, three blocks (grouped sets of
370 columns, with appropriate headers) of water chemistry information are provided. The first block
371 represents collated reported and estimated BLM inputs, the second block represents reported
372 BLM inputs, and the third block represents estimated BLM inputs. Data included in Table S1
373 also represent algae, plants, macrophytes, and cyanobacteria; however, they were removed from
374 the definitive evaluation due to historical USEPA exclusion (n = 78 observations; retained as
375 “other” data). With the exception of data for *R. subcapitata*, most of these “other” data were
376 incomplete with respect to BLM input data. Additionally, 86 observations were removed due to
377 incomplete information with respect to BLM input data, resulting in a definitive dataset which
378 included a total of 834 observations.

379 Initially, 325 of these observations were used to update the unified Zn BLM, and the
380 remainder of the data were used for acute and chronic SSDs and GSDs. However, as described
381 above, acute *P. promelas* data (n = 18) and chronic *C. dubia* data (n = 18) were ultimately
382 excluded from the definitive BLM refinement dataset. As a result, 289 observations were
383 included in the definitive unified Zn BLM dataset. The definitive acute GSD dataset included
384 623 observations, and the definitive chronic dataset considered 211 observations. For the chronic
385 GSD, an additional analysis was performed to identify the most sensitive endpoints for each
386 species, and only those data were used for construction of the chronic GSD.

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387 ***Unified Zn BLM and unified Zn MLR model***

388 Six species from acute tests (*C. dubia*, *D. magna*, *D. pulex*, *O. mykiss*, *P. paludosa*, and
389 *P. promelas*) and five species from chronic tests (*C. dubia*, *D. magna*, *L. stagnalis*, and *O.*
390 *mykiss*) met minimum DOC, hardness, and pH requirements for inclusion in unified BLM and
391 unified MLR model development . The ranges of DOC, hardness, and pH are provided for each
392 exposure type and species in Table S4. Table 2 summarizes the optimized BLM parameters and
393 fitted unified MLR model parameters and Table S5 provides parameters for the species-specific
394 BLMs. Critical accumulations and critical intercepts determined for each species used in the
395 optimization of the unified Zn BLM and fitting of the unified MLR model are also provided in
396 Table 2. For the species-specific BLMs, the PEST r values range from 0.68 for chronic *D.*
397 *magna* to 0.97 for acute *P. paludosa* (Table S5). Removal of acute *P. promelas* data and acute *C.*
398 *dubia* data from the optimization dataset for the unified BLM had relatively minor effects on the
399 log K values for the BL reactions, with the largest relative change occurring for Na, the least
400 important of the TMFs. The largest differences in log K values between the unified BLM and the
401 species-specific BLMs are also for Na, which is shown to be relatively unimportant with log K
402 values at the lower bound of the optimization space (Table S5).

403 The unified BLM ($r^2 = 0.75$; Figure 1A) performs similarly to the unified MLR model (r^2
404 $= 0.71$; Figure 1D), and both models perform better than current nationally recommended
405 hardness equation (USEPA 1996; $r^2 = 0.60$; Figure 1E). Also performing similarly are the
406 unified BLM from DeForest and Van Genderen (2012; Figure 1B) and the separate acute and
407 chronic MLR models from DeForest et al. (2023; Figure 1C). All BLMs and MLR models
408 predict a higher percentage of ECx values within a factor of 2 than the hardness equation (Figure
409 1F). It should be noted that 86% of the observations in the BLM development dataset reported

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410 DOC concentrations <5 mg/L. Therefore, much of the water chemistry-associated variability in
411 Figure 1 is due to changes in major ion concentrations (e.g., water hardness) and pH.

412 While r^2 and $RF_{x,2.0}$ were calculated for the entire unified BLM development dataset to
413 give an overall sense of performance, the r^2 , $RF_{x,2.0}$, and RS values used to calculate the MPS
414 were determined for each individual dataset and then were used to calculate the mean MPS
415 (Table 3). Table S6 provides a summary of MPS calculated for the unified BLM and unified
416 MLR model for each species+endpoint combination included in the model development dataset.
417 On the basis of MPS, the unified BLM (this study) slightly outperforms the other BLMs and
418 MLR models. All BLMs and MLR models outperform the hardness equation.

419 The unified BLM and unified MLR model perform show similar overall performance
420 with acute and chronic toxicity tests varying either DOC or pH while holding other water
421 chemistry conditions constant (Figure 2; Figure S1), with a few notable differences. Both models
422 predict the majority of ECx within 2-fold of observed ECx, but the BLM underpredicts 2 ECx
423 and overpredicts 1 ECx in acute *P. promelas* tests (Figure 2A) and the MLR model overpredicts
424 1 ECx and underpredicts 1 ECx in chronic *C. dubia* tests (Figure 2C). The single variable plots
425 in Figure S1 suggest that the slope of the BLM-based DOC predictions appears to be too steep
426 for *P. promelas* tests by Bringolf et al. (2006), and that the MLR-based DOC slope appears to be
427 too shallow for most of the *C. dubia* tests by Heijerick et al. (2003). On the basis of pH, the BLM
428 and the MLR model over- or underpredict 8 observations. The notable difference is that the BLM
429 is more accurate with the low acute *O. mykiss* ECx values from Cusimano et al. (1986). Figure
430 S1 indicates that for the acute tests the slopes of the relationships are different for the different
431 data series and that the BLM tracks many, but not all these data series. In contrast, the MLR
432 model generally splits the difference with a constant pH slope. Regarding the effects of pH in

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433 chronic tests, the data suggest that ECx are largely unaffected by increases in pH or that they
434 increase slightly. Similarly, the BLM predicts that under the conditions of these tests, ECx
435 should largely be unaffected by pH or slightly increase with pH. Conversely, the unified MLR
436 model predicts slight decreases in ECx. While both models appear to be capable of accurately
437 predicting these results, the BLM tends to better track the shape of the relationships.

438 ***Ambient WQC***

439 Aggregation of BLM-normalized Zn EC50s at the species level resulted in an SSD
440 including 121 SMAVs and a GSD including 88 GMAVs. The 20 most sensitive genera included
441 in the BLM-normalized GSD are shown in Table 4, and the GSD is shown in Figure 3A. Table
442 S7 provides a complete summary of all BLM-normalized SMAVs and GMAVs for all 88 genera
443 for which BLM normalizations could be performed. The most acutely sensitive species was the
444 baetid mayfly *Neocloeon triangulifer*, followed by the rotifer *Euchlanis dilatata*, the snail
445 *Leptoxis ampla*, the rotifer *Lecane quadridentata*, the amphipod *Hyaella azteca*, and the genus
446 for *Ceriodaphnia* water fleas. The calculated FAV (i.e., HC5) critical accumulation level for the
447 acute GSD was 1.011 nmol/gw (Table 2). Using the USEPA moderately hard water recipe
448 (provided in Table 4), the BLM-calculated HC5 is 152 µg/L. Following USEPA (1985), dividing
449 the FAV by two provides a CMC of 76 µg/L. For this same water composition, the current
450 USEPA hardness-based CMC would be 102 µg/L.

451 After screening the dataset to include only the most appropriate chronic ECx associated
452 with each individual toxicity test, the chronic SSD included 161 observations and consisting of
453 136 EC20s, 23 MATCs, and 2 NOECs (Table S8). The 2 NOECs were retained in tests for which
454 no LOECs were available. Of the 161 observations considered for development of the chronic
455 SMCVs and GSD, 150 observations were from flow-through or static renewal tests with fish or

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456 invertebrates. The remaining 11 observations were from static tests conducted with rotifers or
457 bivalves.

458 Aggregation of BLM-normalized chronic values resulted in 38 SMCVs and 30 GMCVs.

459 The BLM-normalized GSD is summarized in Table 5, and the chronic GSD is shown in Figure
460 3B. The most chronically sensitive species was the baetid mayfly *N. triangulifer*, followed by the
461 bivalve *Lampsilis siliquoidea*, the snail *Potamopyrgus jenkinsi*, the water flea *C. dubia*, and the
462 invasive clam species *Corbicula*. The calculated FCV (i.e., HC5) critical accumulation level for
463 the chronic GSD was 0.1076 nmol/gw. Using the USEPA moderately hard water recipe
464 (provided in Table 5), the BLM-calculated FCV corresponds to 17.4 µg/L. For this same water
465 composition, the current USEPA hardness-based WQC is 103 µg/L.

466 ***Application of the Zn BLM to California surface waters***

467 Figure 4 provides a summary of the comparisons of BLM- and hardness-based HQs for
468 freshwaters in California. The dataset shown in Figure 4 includes 1,271 individual samples
469 collected from surface waters across the state of California. Figures 4a and 4c represent BLM
470 and hardness equation application to the California dataset, with no modification, and Figures 4b
471 and 4d represent BLM and hardness equation application to the same dataset, but with inputs
472 constrained to ranges informed by the prescribed ranges for BLM inputs (Windward 2019) and
473 the ranges of inputs in the calibration and SSD datasets for BLM and hardness equation
474 application (Table S4). Specifically, inputs were constrained to $0.1 \leq \text{DOC} \leq 35 \text{ mg/L}$, $5.5 \leq \text{pH}$
475 ≤ 9.0 , $3.2 \leq \text{Ca} \leq 120 \text{ mg/L}$, $0.6 \leq \text{Mg} \leq 52.0 \text{ mg/L}$, $0.2 \leq \text{Na} \leq 240 \text{ mg/L}$, $2.0 \leq \text{Alkalinity} \leq 360$
476 mg/L as CaCO_3 , and $10 \leq \text{hardness} \leq 500 \text{ mg/L as CaCO}_3$. Given that the BLM bases its
477 predictions on chemical speciation, alternative constraints can be applied. However, to avoid
478 interpretation issues, constraints should not extend far beyond the calibration range and should

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479 not extend to conditions that are likely to be considered physiologically stressful. When
480 constraining input values, the constraints were used as ceiling and floor values to avoid omitting
481 data. For application of the hardness equation, the hardness constraint was applied after
482 calculating hardness from constrained Ca and Mg concentrations. Despite the hardness values in
483 the BLM development dataset extending to >800 mg/L as CaCO_3 , the hardness ceiling was set to
484 500 mg/L as CaCO_3 as a compromise between this dataset and the typical hardness ceiling of
485 400 mg/L as CaCO_3 (e.g., as used in the “California Toxics Rule”: 40 CFR § 131.38).

486 On the basis of CMCs, the BLM- and hardness-based HQs agreed in terms of WQC
487 attainment and exceedance for 1,056 samples under the unconstrained scenario (Figure 4A; sum
488 of lower left and upper right quadrants) and for 1,059 samples under the constrained scenario
489 (Figure 4B). In both scenarios, the BLM identified a single sample as a CMC exceedance that
490 was not also a hardness-based CMC exceedance. In the unconstrained scenario, the hardness
491 equation identified 214 samples as CMC exceedances that were not also BLM-based CMC
492 exceedances. In the constrained input scenario, the hardness equation identified 211 samples as
493 CMC exceedances that were not also BLM-based CMC exceedances. For this dataset, BLM-
494 based CMCs are higher than the hardness-based CMCs in 673 samples when inputs are not
495 constrained (53% of samples; Figure S2a). When inputs are constrained, the BLM-based CMCs
496 are higher than the hardness-based CMCs in 667 samples (52% of samples; Figure S2b).

497 On the basis of CCCs, the BLM- and hardness-based HQs agreed in terms of WQC
498 attainment and exceedance for 1059 samples under the unconstrained scenario (Figure 4C) and
499 for 1077 samples under the constrained scenario (Figure 4D). In the unconstrained scenario, the
500 BLM identified 61 samples as CCC exceedances that were not also hardness-based CCC
501 exceedances, whereas the hardness equation identified 151 samples as CCC exceedances that

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502 were not also BLM-based CCC exceedances. In the constrained input scenario, the BLM
503 identified 63 samples as CCC exceedances that were not also hardness-based CCC exceedances,
504 and the hardness equation identified 131 samples as CCC exceedances that were not also BLM-
505 based CCC exceedances. For this dataset, the hardness-based CCCs are higher than the BLM-
506 based CCCs in 979 samples (77% of samples; Figure S2c). When inputs are constrained, the
507 hardness-based CCCs are higher than the BLM-based CCCs in 981 samples (77% of samples;
508 Figure S2d).

509 *Application of the Zn BLM to develop SSWQOs*

510 To explore how time-variable instantaneous WQC (IWQC) could be evaluated to derive
511 SSWQOs, acute or chronic FMBs were calculated on separate datasets for wet and dry weather
512 using data from the Los Cerritos Channel in southern California (Figure 5; Table 6). The Zn
513 BLM-based chronic FMB for combined dry weather (i.e., dry weather samples + compliance
514 samples) and wet weather samples for site LCC1 was 78.6 $\mu\text{g/L}$ and the associated 50th
515 percentile hardness-based IWQC was 138 $\mu\text{g/L}$ (Figure 5A,D; Table 6). The FMBs and hardness-
516 based WQCs both change substantially when the dry weather and wet weather samples are
517 separated. The hardness-based median IWQC for the dry weather samples is 211 $\mu\text{g/L}$, and the
518 BLM-based FMB is 268 $\mu\text{g/L}$ (Figure 5B,E; Table 6). For wet weather samples, the acute FMB
519 for LCC1 is 297 $\mu\text{g/L}$, while the hardness-based median IWQC is 30 $\mu\text{g/L}$ (Figure 5C,F; Table
520 6). For the other sampling locations (i.e., SB4, SB8, SB9, and SB10), only wet weather sampling
521 data were available, but they provided similar results as were observed for the wet weather
522 samples from LCC1.

523 **DISCUSSION**

524 *Comparison of the unified Zn BLM and unified Zn MLR with other models*

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525 The pH response of the optimized BLM in the present study ($\log K_{\text{ZnBL-ZnOH}}$ of -2.45) was
526 very similar to DeForest and Van Genderen (2012; $\log K_{\text{ZnBL-ZnOH}}$ of -2.4). This provides a
527 strong indication that the pH response characterized by the Zn BLM, now including 107 new
528 data points, is conserved across freshwater taxa and endpoints. The results of the species-specific
529 model optimizations (i.e., BL log K values) are similar to those reported for the nearly identical
530 dataset used in DeForest et al. (2023).

531 Aside from the pH response, the hardness response in the unified BLM (this study) is
532 characterized by stronger binding constants for both Ca and Mg than those used in DeForest and
533 Van Genderen (2012). Except for the chronic species-specific model for *O. mykiss*, the optimized
534 Ca binding constants for the species-specific BLMs in the present study (Table S5) are similar to
535 or somewhat higher than that determined in DeForest and Van Genderen (2012) (Tables 1). For
536 fish and invertebrates, only the acute species-specific BLMs for the cladocerans in the present
537 study have lower optimized Mg binding constants than the unified BLM in DeForest and Van
538 Genderen (2012). The highest Mg binding constant in the present study is for the chronic
539 species-specific BLM for *O. mykiss*, for which the Ca binding constant is set equal to the lower
540 PEST constraint.

541 The unified BLM (this study) also has a slightly higher Na binding constant than the one
542 described in DeForest and Van Genderen (2012). Examining the species-specific Na binding
543 constants, it is clear that there is a wide range of variability in the Na binding constants with Na
544 appearing to be very important for some species, but much less so for other species. For
545 example, acute species-specific BLMs for *C. dubia*, *D. pulex*, and *P. paludosa* and the chronic
546 species-specific BLM for *L. stagnalis* were fixed at the lower log K boundary (i.e., 0.9) for the
547 PEST optimizations. Yet the PEST optimized log K in the acute *O. mykiss* species-specific

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548 model was 4.4. The Na log K value for unified model indicates that overall, Na does appear to
549 affect Zn bioavailability, so it was retained in the unified BLM.

550 As might be expected, the unified MLR slopes for pH, ln(DOC), and ln(hardness) (Table
551 3) are intermediate to the slopes for the separate acute and chronic models developed by
552 DeForest et al. (2023). The pH slope in the present study is -0.2, while the acute and chronic pH
553 slopes from DeForest et al. (2023) were -0.12 and -0.646, respectively. The ln(DOC) slope in the
554 present study is 0.176, while the acute and chronic ln(DOC) slopes from DeForest et al. (2023)
555 were 0.127 and 0.376, respectively. The ln(hardness) slope in the present study is 0.553, while
556 the acute and chronic ln(DOC) slopes from DeForest et al. (2023) were 0.600 and 0.237,
557 respectively. A less negative pH slope for acute ECx would improve MLR performance for some
558 of the data in Figure S1 but would make it worse for Hyne et al. (2005) and Cusimano et al.
559 (1986). While data from Cusimano et al. (1986) were not included in the calibration dataset used
560 by DeForrest et al. (2023), data for Hyne et al. (2005) were included. A more negative slope for
561 chronic ECx would make the predictions worse for all the data included in Figure S1, suggesting
562 that data from tests in which pH covaried with other TMFs had a greater influence on the fitted
563 pH slope. Similarly, a shallower slope for the DOC term would likely make predictions worse
564 for the acute studies in which DOC concentrations were tested above 5 mg/L (Figure S1).
565 Conversely, a higher slope for chronic tests in which DOC was varied would improve MLR
566 predictions for the chronic DOC tests in Figure S1. It is worth noting that data from Heijerick et
567 al. (2003) were not used in the development of the MLRs described by DeForest et al. (2023),
568 nor were they used in the update of the unified BLM (this study).

569 ***Unified Zn BLM and unified Zn MLR model performance***

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570 The unified Zn BLM and unified Zn MLR model were shown to perform comparably
571 based on qualitative and quantitative evaluations (Figures 1 and 2, Table 3). Despite the BLM
572 having slightly higher MPS than the unified MLR model (0.78 vs. 0.75), both models predicted
573 84% of ECx to within 2-fold of observed ECx. However, the unified BLM (this study) arguably
574 better approximates the behavior (i.e., shape of response) of ECx across ranges of DOC and pH
575 when other water chemistry conditions are held constant (Figure S1). For example, the unified
576 BLM generally predicts the shape of the DOC response in chronic *D. magna* tests, whereas the
577 unified MLR model shows a much shallower slope that is inconsistent with the effect of DOC on
578 ECx at DOC concentrations greater than 10 mg/L. Conversely, the unified BLM tends to
579 underpredict ECx at DOC <5 mg/L. In terms of pH responses, the ability of the unified BLM to
580 predict different pH responses under different conditions (i.e., in the very soft waters in the *O.*
581 *mykiss* tests by Cusimano et al. 1986, and in the very hard *P. pomacea* tests by Hoang and Tong
582 2015) is clearly an advantage over the unified MLR model. This is also true in the chronic tests,
583 where the data indicate either no effect of pH on ECx or that ECx slightly increases with
584 increasing pH. It is worth noting that application of the unified BLM and unified MLR model to
585 data from Cusimano et al. (1986) represents a true validation test, because those data were not
586 included in the calibration dataset.

587 The primary data series for which the unified MLR model more accurately predicts the
588 response to varying DOC concentrations is the acute results for *P. promelas* (Bringolf et al.
589 2006). The only difference between the Bringolf et al. (2006) tests and the other DOC tests is
590 that Na concentrations were comparatively low (~4 mg/L), except in two of the high DOC tests
591 where both Na and Cl concentrations were elevated (up to ~420 mg/L and 700 mg/L,
592 respectively). It is also worth noting that the species-specific BLM and MLR models developed

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593 for *P. promelas* in DeForest et al. (2023) were exceedingly poor (with $r^2 < 0.05$), suggesting
594 either that TMFs affect their response differently than for other organisms, or more likely that
595 inter-lab variability has introduced noise to the dataset. The inability of TMFs to explain
596 variation in EC50s for *P. promelas* in DeForest et al. (2023) was the reason we excluded from
597 the dataset used to update the unified Zn BLM and unified MLR model.

598 From the perspective of WQC, the unified BLM (this study), the unified MLR (this
599 study), and the separate acute and chronic MLR models (DeForest et al. 2023) offer potentially
600 effective alternatives to hardness-based WQC. Figure 1 and Table 3 clearly indicate that all the
601 BLMs and MLR models considered here are superior to the hardness equation based on r^2 ,
602 $RF_{x,2,0}$, and MPS. It should be recognized that marginal differences in the MPSs for the BLMs
603 and MLR models (e.g., 0.75 vs. 0.78) may to some extent be reflective of inherent variability in
604 ecotoxicity data, but that the BLMs and MLR models consistently perform better than the
605 hardness equation based on all quantitative metrics. Unified models would be the most
606 parsimonious, and the unified MLR model offers the simplest model, but the qualitative
607 evaluation with the single variable pH and DOC tests highlights some potential limitations. Use
608 of a unified model would also prevent the potential issue of CCCs being higher than FAVs. For
609 example, applying the unified BLM to nearly 100,000 freshwater sampling events compiled from
610 the water quality portal (Water Quality Portal 2021), almost all (i.e., 99.98%) chronic criteria
611 would be lower than acute criteria. Although the BLM-derived FAV is always higher than the
612 BLM-derived FCV, there is a small percentage (0.02%) of sampling events for which the CMC
613 is reduced to a lower value than the CCC due to the applied safety factor (i.e., the CMC =
614 FAV/2). With the unified MLR model, this would never occur if the effective acute-to-chronic
615 ratio is >2 . In comparison, when applying the separate acute and chronic Zn MLR models

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616 (DeForest et al. 2023), the acute and chronic criteria are inverted (chronic higher than acute) in
617 5% of the sampling events. Using the same dataset to evaluate this phenomenon for potential
618 MLR-based Cu WQC (Brix et al. 2021) indicates an even higher inversion rate, but this issue
619 does not occur with the current nationally recommended Cu BLM (USEPA 2007) which uses an
620 acute-to-chronic ratio of 3.22.

621 ***Sensitivity of WQC to estimated BLM inputs***

622 Many of the studies requiring estimates were also used by DeForest et al. (2023) to
623 develop and apply Zn MLR models for WQC. Overall, we viewed the inclusion of studies that
624 required some level of input estimation as beneficial because it expanded the scope of the acute
625 and chronic SSDs and retained several sensitive genera that otherwise would have been omitted
626 because one or more estimates were needed to establish BLM inputs. To emphasize this point, of
627 the 10 most sensitive genera included in the acute GSD, only two species did not require some
628 level of estimation for at least one BLM input (see Table 4 and Table S2). Similarly, for the
629 chronic GSD, only one of the five most sensitive species (*Lampsilis siliquoidea*) did not require
630 some level of estimation for at least one BLM input. Given that we are reasonably confident in
631 the exposure chemistry estimates, omitting these data because of missing information would
632 have neglected to include important sensitive taxa.

633 Even under reasonable worst-case scenarios, where all estimated BLM inputs were
634 increased or decreased by as much as 2-fold for DOC concentration and 1.5-fold for major ions
635 (ranges based on ~2 standard deviation variability observed for targeted water chemistries in the
636 ecotoxicity database), the resulting change in BL binding constants was less than 5% in all cases
637 and acute and chronic WQC determinations changed by generally less than 4% from the original
638 input estimation scenario (Table S9 and Supplementary Text 1). It should also be noted that

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639 simultaneously modifying all estimated TMF inputs to an extreme value (i.e., increased or
640 decreased by 2-fold) is a highly unlikely scenario. As an example, there is about a 2.3% chance
641 that a single estimated DOC concentration would be 2-fold lower or higher (or approximately 2
642 standard deviations) than the mean estimate based on reported water chemistry from similar
643 source waters, but the joint probability of even 5 estimated DOC concentrations simultaneously
644 being 2-fold higher (or simultaneously 2-fold lower) than the estimate is $0.023^5 = 6.1E-09$. Even
645 under these unlikely worst-case scenarios, a maximum deviation in CCC of 20.8% (or change
646 from 17.7 $\mu\text{g/L}$ to 14.0 $\mu\text{g/L}$) and a maximum deviation in CMC of 13.7% (or change from 75.8
647 $\mu\text{g/L}$ to 65.4 $\mu\text{g/L}$) – with a median change of 1.2% for CCC and 3.2% for CMC for all scenarios
648 is remarkable. Much of this can be traced to the pragmatism of the USEPA (1985) approach for
649 deriving FAVs and FCVs, by which only the data for the 4 genera that are nearest to the 5th
650 percentile are directly needed to calculate the FAV and FCV. Our evaluation demonstrated that
651 unlikely worst-case estimation scenarios do not have much influence on the fits of BLM
652 parameters or the identity of the 4 genera that are closest to the 5th percentile. This is an
653 extremely important revelation that should temper concerns about the number of estimates
654 present in the Zn ecotoxicity dataset.

655 Retaining data from studies requiring estimates for BLM inputs facilitated the
656 development of a comprehensive ecotoxicity dataset that included many sensitive organisms that
657 would have been omitted had the estimates not been made. Because several sensitive species
658 were included in the final acute and chronic SSDs, the resulting CMC and CCC appear to be
659 protective of threatened and endangered species in California, as well as likely protective of
660 adverse impacts on salmonid chemosensory endpoints (Supplementary Text 2).

661 ***Applicable chemistry ranges for unified Zn BLM-based WQC***

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662 The dataset used to develop the unified Zn BLM covers a wide range of water chemistry
663 conditions (Table S4). The ranges of pH, DOC, and hardness considered in the unified Zn BLM
664 dataset were 5.42-8.6 S.U., 0.09-29 mg/L, and 6.7-826 mg/L as CaCO₃, respectively. All other
665 major ions covered a similarly wide range (see Table S4). Approximately 98% of the pH values
666 in the Zn ecotoxicity database were reported as measured, including the minimum and maximum
667 reported values. Roughly half of the DOC concentrations used in the unified Zn BLM calibration
668 dataset were estimated, and the vast majority of those estimates were for laboratory derived
669 waters (i.e., well water, dechlorinated municipal water, or reconstituted waters). The highest and
670 lowest DOC concentrations in the calibration dataset were based on measured values, although
671 the lowest concentration (Hansen et al. 2002) was associated with total organic carbon
672 concentrations that were near or below the detection limit of 0.09 mg/L. Therefore, we can be
673 reasonably confident that the DOC concentration was no higher than 0.09 mg/L. Regarding the
674 highest and lowest water hardness values, both values were measured and the highest value of
675 826 mg/L as CaCO₃ was from an acute *D. magna* test, and the lowest value of 6.7 mg/L as
676 CaCO₃ was from a chronic *D. magna* test. The water chemistry ranges are quite wide and
677 encompass >90% of conditions observed in US surface waters (e.g., Table 1 in Brix et al. 2020
678 indicates that 5th to 95th percentiles for pH, DOC, and hardness in US waters are 6.5 to 8.5, 1.1 to
679 9.9 mg/L, 21 to 420 mg/L as CaCO₃, respectively). Therefore, the unified BLM is widely
680 applicable and given that the BLM framework defines bioavailability on the basis of bioavailable
681 Zn species (determined through equilibrium-based chemical speciation calculations), application
682 to conditions outside these ranges may be defensible.

683 ***Effects of TMFs on Zn BLM-based WQC calculations and comparisons with the hardness***
684 ***equation***

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685 Applying the unified Zn BLM to a number of potential freshwater chemistry scenarios
686 provides an indication of how the BLM calculations change with changing water chemistry
687 conditions (Figure 6). Such an evaluation also provides an indication of how BLM-based WQC
688 calculations compare with the existing hardness equation. Because the acute and chronic
689 hardness-based WQC for Zn are essentially the same equation (i.e., acute-to-chronic ratio = 2, so
690 CMC and CCC are equal, except for the conversion factor that translates from total Zn to
691 dissolved Zn), we show a single hardness-based WQC for each hardness indicated in Figure 6.

692 The effect of DOC concentration on Zn BLM-based WQC (Figure 6A) is similar for both
693 acute and chronic WQC for waters with varying DOC at pH 6.5, but the effect of DOC
694 concentration on acute and chronic WQC differs somewhat at pH 7.5 and 8.5. For both acute and
695 chronic WQC, the effect of DOC concentration is minimal for DOC concentrations below
696 approximately 2 mg/L. This is especially true for waters with a pH of 6.5. For waters with pH 7.5
697 and 8.5, the effect of DOC is greater than in waters with pH of 6.5. The apparently interactive
698 effect of pH and DOC concentration can largely be explained by the effect of protons on
699 dissolved organic matter (DOM) binding sites. At lower pH, more sites will be occupied by
700 protons and therefore will be less likely to accept Zn. The result is that DOM is not as effective
701 at binding Zn as pH decreases. It is also apparent that an increase of DOC concentration under
702 higher pH conditions has a greater effect on Zn bioavailability than at lower pH. The crossing of
703 the different pH series also somewhat reflects the interplay between speciation effects and
704 competition effects at the biotic ligand. The apparent difference in slope between the CMC and
705 CCC also demonstrates that the DOC response is stronger for the CCC than for the CMC, which
706 agrees with the difference in DOC slope for the two different MLR models described by
707 DeForest et al. (2023). Conceptually, this can be explained by the importance of stronger binding

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708 sites on DOM in the lower Zn concentrations ranges that are relevant for chronic effect
709 concentrations. In contrast to an MLR-based approach using separately fitted acute and chronic
710 MLR models, the unified BLM characterizes this difference with a single model.

711 The effect of hardness on BLM-based WQC appears to be consistent for both acute and
712 chronic exposures, and the slopes of the relationship increase slightly with decreasing pH (Figure
713 6B). Additionally, the BLM-based hardness response is very similar to the hardness equation
714 (USEPA 1996) for hardness greater than approximately 40 mg/L as CaCO₃. At lower hardnesses,
715 the BLM-predicted hardness effect is slightly lower than that indicated by the hardness equation.
716 In Figure 6B, the BLM predicted WQC are shown for a DOC of 0.5 mg/L, and it is clear that all
717 WQC are lower than the hardness equation across the entire range of hardness considered. Figure
718 6B emphasizes the major inadequacy of the hardness equation, with respect to CCC. The BLM-
719 based CCC would be more appropriately protective, given the information we have on the
720 sensitivity of aquatic organisms to chronic exposures to Zn. At a higher DOC concentration (i.e.,
721 at 10 mg/L), the slopes of the hardness response become much shallower (Figure S3), and the
722 BLM-based CMC exceed the current hardness-based CMC. The increase in magnitude relative
723 to the hardness equation is expected, but the decrease in hardness slope with increased DOC
724 concentration indicates that DOC has a large relative effect on bioavailability at hardness less
725 than ~80 mg/L.

726 The effect of pH on BLM-predicted WQC indicates that at a DOC concentration of 0.5
727 mg/L, Zn tends to be slightly more toxic as pH increases (Figure 6C). This is consistent with the
728 MLR models developed by DeForest et al. (2023). Figure 6C also indicates that the current
729 hardness equation is not protective of chronic effects at any pH, and that it is generally not
730 protective of acute effects as pH increases. When DOC concentration is increased to 10 mg/L

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731 (Figure S3), the pH response changes as a result of the pH-dependent properties of DOM. These
732 changes in pH response across ranges of DOC concentrations and hardnesses are also evident in
733 Figure S1. At high hardness (i.e., 500 mg/L as CaCO₃), the Zn BLM predictions are consistent
734 with the current hardness equation predictions. However, when hardness decreases with 10 mg/L
735 DOC in the exposure water, the Zn BLM-predicted WQC generally increases as pH increases
736 above pH 6.3. Unlike the MLR-based predictions, the BLM-based predictions are not linearly
737 related to pH.

738 *Application of the Zn BLM to California surface waters*

739 The BLM results in higher CMC estimates than the hardness equation in slightly more
740 than half of the samples considered (Figure S2a,b). On the basis of exceedance frequency, where
741 the measured dissolved Zn concentration is also considered, the BLM indicates fewer CMC
742 exceedances than the hardness equation (Figure 4A,B). However, when CCCs are considered,
743 the BLM is much more likely to provide lower CCC estimates than the hardness equation
744 (Figure S2c,d). Interestingly, the BLM identifies fewer CCC exceedances (Figure 4C,D) than the
745 hardness equation. This happens despite the generally lower BLM-based CCCs, which suggests
746 that hardness-based CCC exceedances tend to occur in samples with lower Zn bioavailability
747 conditions (i.e., lower pH or higher DOC) that are not properly characterized with the hardness
748 equation. The high rate of hardness-based WQC exceedances, despite generally higher WQC
749 estimates, indicates that hardness is not the most dominant TMF in the samples that exceed the
750 hardness-based WQC, but not the BLM-based WQC. Importantly, the chronic BLM-based WQC
751 identify many water samples in which Zn concentrations might not necessarily be safe to aquatic
752 life, whereas the hardness-based HQs for the same samples incorrectly indicate that they are safe.
753 We can come to this conclusion based on the improved accuracy of the BLM relative to the

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754 hardness equation. Therefore, use of the unified zinc BLM for WQC in areas such as southern
755 California – where stormwater runoff can contribute to elevated zinc and DOC concentrations in
756 urban waterways (e.g., Kayhanian et al. 2007; Kayhanian et al. 2012) – would improve
757 identification and management of impaired waters.

758 In addition to being more accurate than hardness-based WQC, BLM-based WQC appear
759 to be protective of all aquatic species listed as threatened and endangered in California
760 (Supplementary Text 2). Although, it should be noted that some uncertainty exists for a single
761 species (vernal pond tadpole shrimp), for which a sensitive surrogate species could only be
762 identified at the class level. Additionally, BLM-based WQC appear to be protective of predator
763 detection in Coho salmon (Supplementary Text 2), though there is some uncertainty in the
764 reported effect concentrations for this endpoint because of an unbounded LOEC of 30 $\mu\text{g/L}$ from
765 a 3-hour exposure (Smith 2023). However, the CMC of 22 $\mu\text{g/L}$ is below this LOEC, and the
766 CCC is so low (5 $\mu\text{g/L}$) that it is approaching background concentrations. Given the short
767 exposure time, the CMC would be considered the more applicable criterion for comparison. Our
768 evaluations also indicated that the Zn BLM-based CCCs also appear to be protective of Zn
769 detection in Atlantic salmon and rainbow trout (Supplementary Text 2).

770 *Application of the Zn BLM to develop SSWQOs*

771 The FMB approach takes into consideration the site-specific conditions that influence
772 metal bioavailability, including metal concentration, the effects of TMs on IWQC, the
773 correlation between metal concentrations and IWQC, and their relative variability to identify a
774 concentration that shall not be exceeded more frequently than the allowable exceedance
775 frequency to ensure attainment of WQC. The interplay among these variables changes from site
776 to site, so that it is virtually impossible to arbitrarily select an appropriately protective IWQC

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777 percentile (e.g., 5th, 10th, or 50th) at any given location. For example, in the analysis conducted by
778 Ryan et al. (2018), the calculated Cu BLM-based FMBs for 61 different surface waters across
779 the US ranged from the 1st to 94th percentile of the site-specific IWQC distributions. The
780 conditions driving that range of percentiles were identified as the correlation between the metal
781 concentration and IWQC and their relative variability. Arbitrarily choosing a low percentile (e.g.,
782 5th or 10th), as previously suggested (e.g., USEPA 2015, 2021; Idaho DEQ 2017), may be
783 overprotective in many cases, and not protective enough in other cases.

784 The FMB approach could be used to correctly implement any bioavailability-based WQC
785 in a manner consistent with USEPA (1985) guidelines, including the hardness equation. When
786 considering all sample types (i.e., compliance, dry weather, and wet weather) for the LCC1
787 location, the FMB approach gives a much lower SSWQO than the hardness equation, and this
788 low FMB can be explained largely by the low correlation (i.e., Pearson's $r = 0.039$) between Zn
789 concentration and IWQC (Table 6). This low correlation is likely explained by combining data
790 from two very different populations of samples. Indeed, when the FMB approach is applied
791 separately to the dry weather and wet weather samples for LCC1, the FMBs are much higher
792 than when all data are combined. The correlation between Zn concentration and IWQC is much
793 higher when FMBs are calculated on the dry weather and wet weather samples separately, and
794 this along with the relative variability in the Zn concentrations and IWQCs is an important
795 determinant of the IWQC percentile at which the FMB occurs (Ryan et al. 2018). The FMB
796 approach implicitly makes use of these site-specific attributes by using sample-specific HQs to
797 evaluate if Zn concentrations exceed IWQC. The higher positive correlations between Zn
798 concentration and IWQC indicate that relatively high Zn concentrations are observed when Zn
799 bioavailability conditions are relatively low.

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800 The low hardness-based median WQC for wet weather (Table 6) indicates that the wet
801 weather samples are relatively soft compared to the dry weather samples, and this can be verified
802 by examining the LCC dataset (Table S3). These results also suggest that during wet weather
803 events, hardness is not the dominant TMF. For all locations under wet weather conditions, there
804 is a large difference between the BLM-based FMBs and the acute hardness-based median
805 WQCs. Table 6 shows that for all wet weather sampling events, there is a high correlation
806 between Zn concentration and IWQC. These high correlations contribute to the high FMBs,
807 which all occur well above the 50th percentile of each IWQC distribution. Importantly, it should
808 be recognized that all FMBs presented in Table 6 and Figure 6 represent a literal interpretation of
809 the USEPA (1985) guidelines in that the FMB would be the concentration that should not be
810 exceeded at a given location more frequently than once every three years to attain WQC. It is
811 also important to note that because dry weather and wet weather samples have such different
812 attributes, they should be separated (at least at this location) for the purpose of defining
813 SSWQOs.

814 **CONCLUSIONS**

815 The Zn ecotoxicity dataset by DeForest et al. (2023) for development of Zn MLR models
816 and further refined by this study is robust and fully supports development of a unified Zn BLM
817 and a unified MLR model for freshwaters. The unified Zn BLM performs better than the
818 hardness equation by explicitly considering the effects of multiple TMFs (in addition to
819 hardness) on Zn toxicity to aquatic life. Additionally, using quantitative and/or qualitative
820 evaluation metrics, the unified Zn BLM performs marginally better than the unified Zn MLR
821 model, similarly to separate acute and chronic Zn MLR models, and marginally better than the
822 14 year-old version of the unified Zn BLM. Marginal differences in MPSs for the BLMs and

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823 MLRs may to some extent reflect inherent variability in the ecotoxicity datasets, but the
824 qualitative single-variable pH and DOC evaluations appear to better support BLM behavior over
825 a wide range of conditions. Given these considerations, the unified Zn BLM, unified Zn MLR
826 model, and separate acute and chronic Zn MLR models offer potentially effective alternatives to
827 the hardness equation, but each comes with advantages and limitations.

828 Biotic ligand model-based CMCs are lower than current hardness-based CMCs when
829 DOC concentrations are less than ~3 mg/L, and Zn BLM-based CCC are lower than current
830 hardness-based CCC when DOC concentrations are less than ~10 mg/L. These outcomes are due
831 to the Zn BLM more accurately characterizing the effects of TMs on Zn toxicity than the
832 hardness equation and due to the update of the Zn WQC databases used to derive the WQC.
833 Biotic ligand model-based WQC appear to be protective of aquatic species listed as threatened
834 and endangered in California, and they also appear to be protective of olfactory responses in
835 salmonids.

836 Application of Zn BLM-based WQC to monitoring data from the State of California
837 indicates that fewer statewide exceedances of both acute and chronic Zn WQC are likely to
838 occur, despite the chronic Zn BLM-based WQC being lower than the hardness-based WQC in
839 77% of samples. Implementing the Zn BLM using the FMB approach in the Los Cerritos
840 Channel in southern California indicates that dry weather and wet weather samples should be
841 considered separately when developing SSWQOs.

842

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843 **FIGURE CAPTIONS**

844 **Figure 1.** Performance of the unified biotic ligand model (BLM) (this study) (A), unified BLM
845 from DeForest and Van Genderen (2012) (B), separate acute and chronic multiple linear
846 regression (MLR) models from DeForest et al. (2023) (C), unified MLR model (this study) (D),
847 and hardness equation (E) with the calibration dataset. The percentage of predictions within a
848 specified residual factor difference from observed ECx is shown in (F). ECx = Effect
849 concentration at 'x' effect level, generally 20% and 50% for the data presented; r^2 = the
850 coefficient of determination in the most general sense, where $r^2 = 1 - (\text{residual sum of}$
851 $\text{squares}/\text{total sum of squares})$.

852 [Alt text: Model performance comparison showing predicted versus observed zinc toxicity.
853 Compared with the previous BLM and MLR models, the unified BLM most closely matches
854 observations across species and exposure durations, while the hardness equation shows the
855 greatest deviation. Overall, the unified BLM produces the highest proportion of predictions
856 within approximately two-fold error.]

857

858 **Figure 2.** Comparison of unified biotic ligand model (BLM) (A and B) and unified multiple
859 linear regression (MLR) model (C and D) performance with data from acute (circles) and chronic
860 tests (squares) where dissolved organic carbon (DOC) concentrations (A and C) and pH (B and
861 D) were varied. See Figure S1 for predicted and observed responses plotted vs. pH or DOC. ECx
862 = Effect concentration at 'x' effect level. For acute tests, all ECx are for 50% effect (i.e., EC50)
863 and for chronic tests all ECx are for 50% effect (i.e., EC50). Organisms tested in each study
864 were: Hyne et al. (2005) – *C. dubia*; Clifford and McGeer (2009) – *D. pulex*; Bringolf et. al.
865 (2006) – *P. promelas*; Hoang and Tong (2015) – *P. paludosa*; Heijerick et al. (2002) – *D.*

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866 *magna*; Schubauer-Berigan et al. (1993) (a) – *P. promelas*; Schubauer-Berigan et al. (1993) (b) –
867 *C. dubia*; Cusimano et al. (1986) – *O. mykiss*; Heijerick et al. (2005) – *D. magna*; Heijerick et al.
868 (2003) – *D. magna*. The different data series for Heijerick et al. (2003) represent different water
869 chemistry conditions as follows: (a) Hardness = 240 mg/L as CaCO₃, pH = 7.25; (b) Hardness =
870 240 mg/L as CaCO₃, pH = 7.25; (c) Hardness = 240 mg/L as CaCO₃, pH = 7.25; (d) Hardness =
871 240 mg/L as CaCO₃, pH = 7.25; (e) Hardness = 240 mg/L as CaCO₃, pH = 7.25; (f) Hardness =
872 240 mg/L as CaCO₃, DOC = 21 mg/L; (g) Hardness = 110 mg/L as CaCO₃, DOC = 9.7 mg/L;
873 (h) Hardness = 370 mg/L as CaCO₃, DOC = 32.3 mg/L; (i) Hardness = 370 mg/L as CaCO₃,
874 DOC = 9.7 mg/L; (j) Hardness = 110 mg/L as CaCO₃, DOC = 32.3 mg/L.
875 [Alt text: Predicted versus observed zinc toxicity for datasets where DOC or pH varies. Except
876 for a single acute *Pimephales promelas* study testing the effects of DOC, the unified BLM
877 consistently tracks observed changes for both acute and chronic tests, whereas the unified MLR
878 generally shows greater scatter, especially for pH effects.]

879
880 **Figure 3.** Unified biotic ligand model (BLM)-normalized genus mean acute values (GMAVs)
881 (A) and genus mean chronic values (GMCVs) (B). Black diamonds represent GMAVs in (A) and
882 GMCVs in (B). For genera representing multiple species, box-and-whisker plots are provided for
883 the normalized species mean acute values (SMAVs) (A) and species mean chronic values
884 (SMCVs) (B), where the edge of the boxes represent the 25th and 75th percentiles and the
885 whiskers represent the range of data points within 1.5-fold times the interquartile range from the
886 median. Normalization conditions are provided in the footnote for Table 3. Criteria maximum
887 concentrations (CMCs) and criteria continuous concentrations (CCCs) calculated using three
888 different models are shown for reference.

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889 [Alt text: Acute and chronic normalized genus sensitivity distributions for zinc with criteria
890 benchmarks. Biotic ligand model-derived criteria align with the lower portion of the sensitivity
891 distribution, and those derived in this study are lower than previous BLM-derived criteria and
892 current hardness-based criteria.]

893

894 **Figure 4.** Comparison of unified Zn biotic ligand model (BLM)-based and hardness-based
895 hazard quotients for California fresh surface waters. Dashed lines represent hazard quotients of 1
896 for each criteria calculation method. Calculations were performed using unconstrained input data
897 for both acute (A) and chronic (C) criteria comparisons, and with constrained input data for acute
898 (B) and chronic (D) criteria comparisons. The constraints for model application were applied to
899 provide minimum and maximum dissolved organic carbon (DOC), calcium (Ca), magnesium
900 (Mg), and sodium (Na) concentrations, alkalinity and hardness values, and pH for inputs to the
901 BLM and hardness equation (i.e., floor and ceiling values). If reported values for inputs were
902 below the minimum value, the minimum value was used for input. Similarly, if reported values
903 for inputs were above the maximum value, the maximum value was used for input. The
904 constraints were: $0.1 \leq \text{DOC} \leq 35 \text{ mg/L}$, $5.5 \leq \text{pH} \leq 9.0$, $3.2 \leq \text{Ca} \leq 120 \text{ mg/L}$, $0.6 \leq \text{Mg} \leq 52.0$
905 mg/L , $0.2 \leq \text{Na} \leq 240 \text{ mg/L}$, $2.0 \leq \text{alkalinity} \leq 360 \text{ mg/L as CaCO}_3$, and $10 \leq \text{hardness} \leq 500$
906 mg/L as CaCO_3 . Data used to develop these comparisons were from the water quality portal and
907 the Los Cerritos Channel (LCC) Watershed Group.

908 [Alt text: Comparison of acute and chronic hazard quotients calculated using hardness-based and
909 unified BLM criteria for California waters. Biotic ligand model-based hazard quotients are
910 generally lower, indicating fewer exceedances, and this pattern remains after applying input
911 constraints.]

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912

913 **Figure 5.** Unified Zn biotic ligand model (BLM)-based fixed monitoring benchmark (FMB)
914 evaluation and hardness-based criteria continuous concentrations (CMC) and criteria continuous
915 concentrations (CCC) for data from a location within the Los Cerritos Channel (LCC1).
916 Specifically chronic FMB calculations (A) and chronic hardness-based criteria (D) were
917 determined for combined dry, compliance, and wet sampling events for LCC1, combined dry and
918 compliance samples for LCC1 (B, E), and wet weather samples (C, F). The dashed horizontal
919 black line represents a hazard quotient (HQ) of 1, the dashed horizontal blue line represents the
920 FMB and is drawn to aid in visualizing the instantaneous water quality criteria (IWQC)
921 percentile that corresponds to the FMB, and the solid grey vertical line represents the allowable
922 criteria exceedance frequency of once in three years.

923 [Alt text: Biotic ligand model-based fixed monitoring benchmark results for a monitoring
924 location in the Los Cerritos Channel in southern California show much higher fixed monitoring
925 benchmarks when dry-weather and wet-weather samples are evaluated separately than when
926 combined. Conversely, median hardness-based criteria increase in dry-weather samples but
927 decrease by more than 4-fold in wet-weather samples.]

928

929 **Figure 6.** Comparison of unified Zn biotic ligand model (BLM)-based criteria maximum
930 concentrations (CMC) and criteria continuous concentrations (CCC) with current hardness-based
931 criteria across a range of dissolved organic carbon (DOC) concentrations (A), hardness (B), and
932 pH (C). The grey dot dash line represents hardness-based criteria, and the colored lines represent
933 unified Zn BLM-based criteria. Figure S3 shows how unified BLM predicted CMC and CCC
934 change when 10 mg/L DOC is included in the simulations for (B) and (C).

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935 [Alt text: Acute and chronic zinc criteria predicted by the unified biotic ligand model vary with
936 dissolved organic carbon concentration and pH. The unified BLM shows a hardness-dependent
937 slope similar to the hardness equation, and in moderately hard water acute biotic ligand model-
938 based criteria remain below hardness-based criteria if dissolved organic carbon concentrations
939 are less than 3 mg/L.]

940

941

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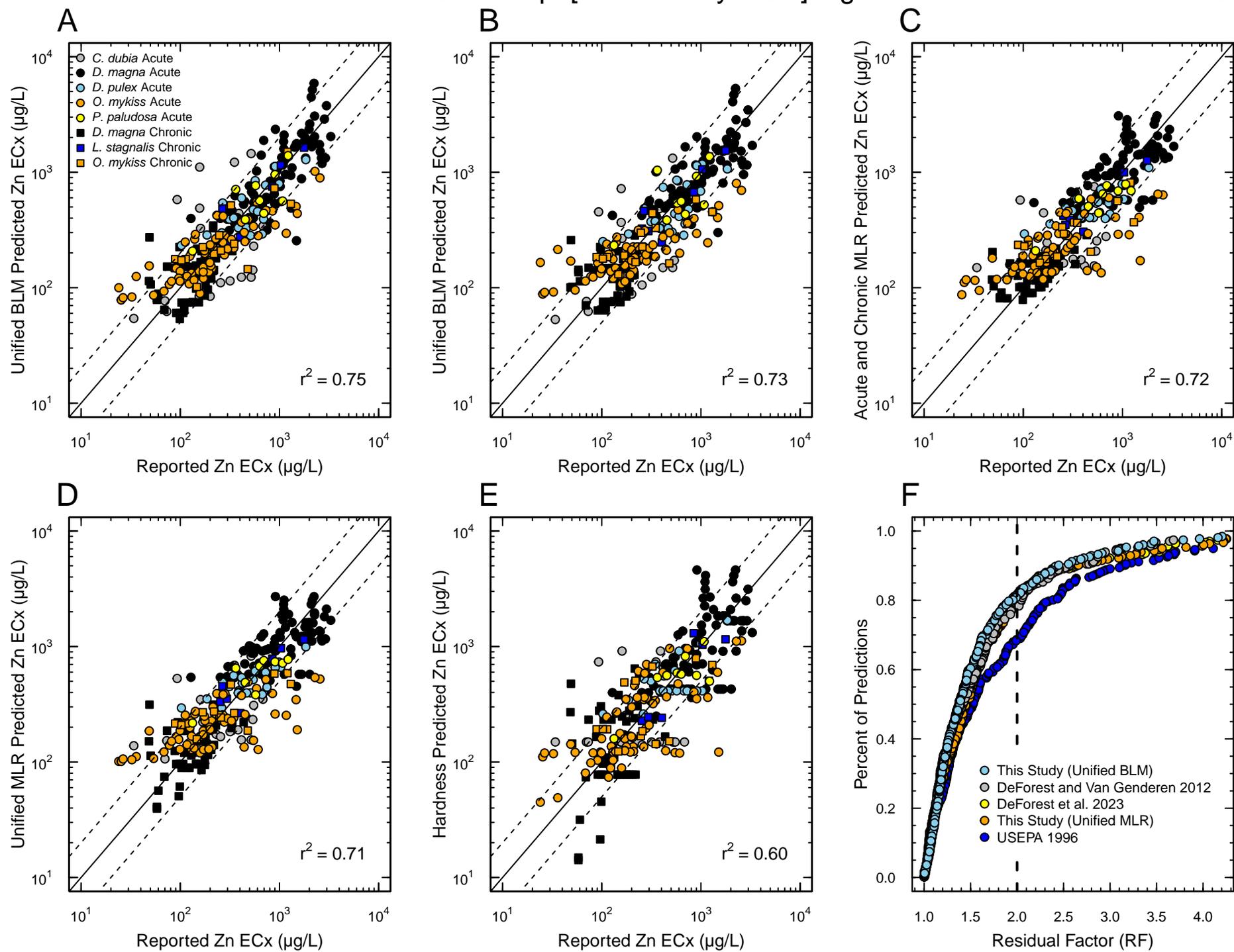
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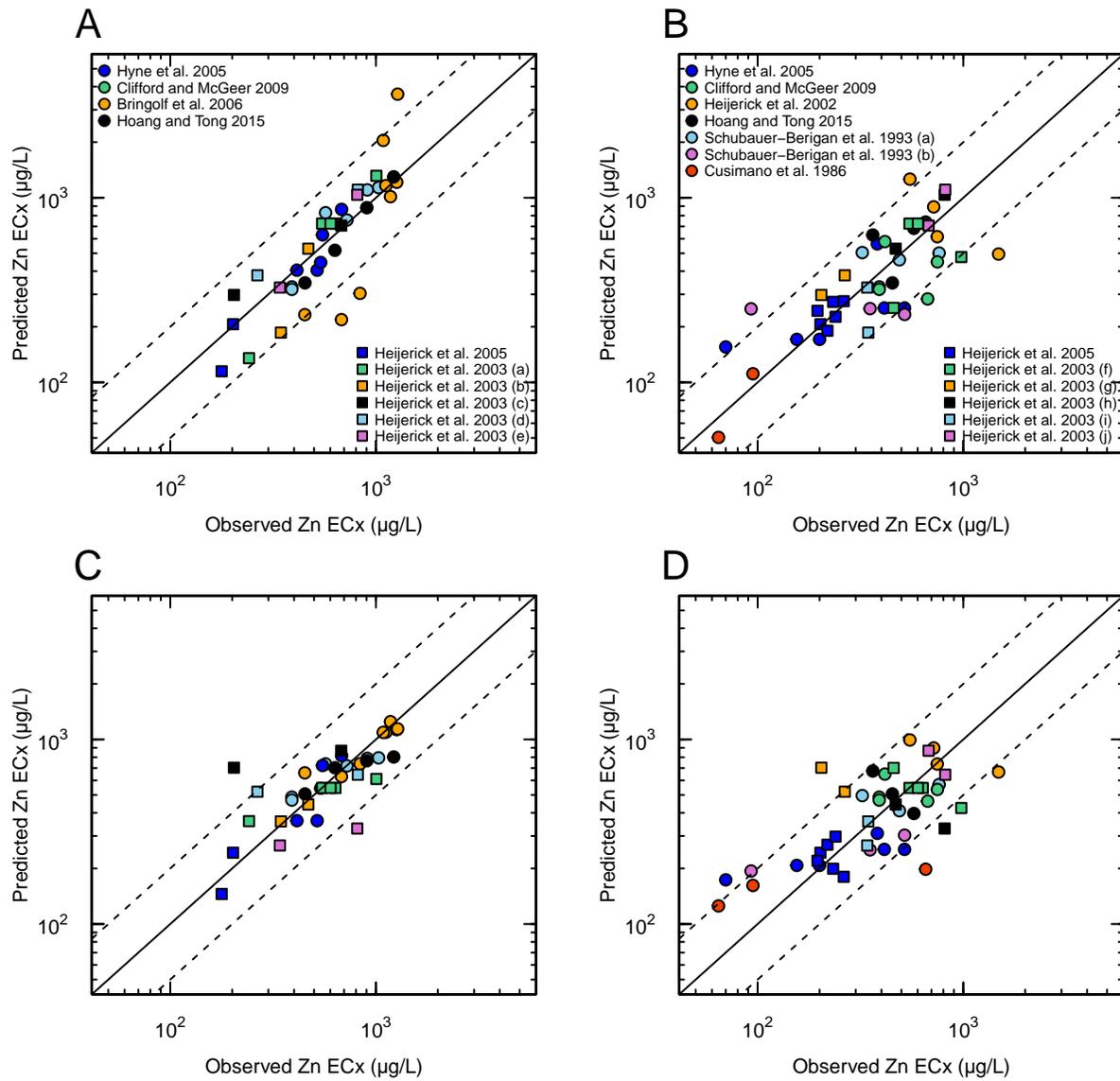
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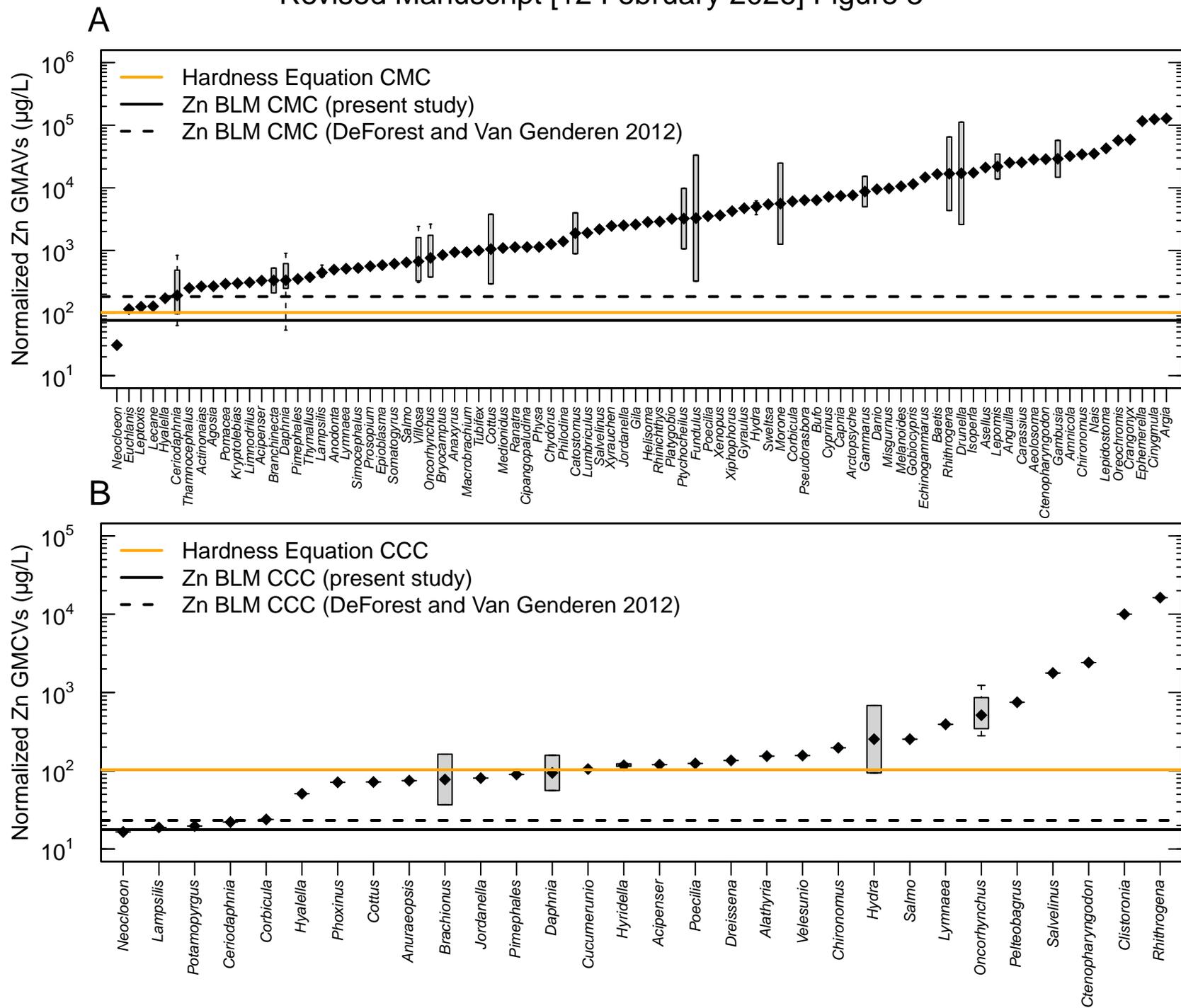
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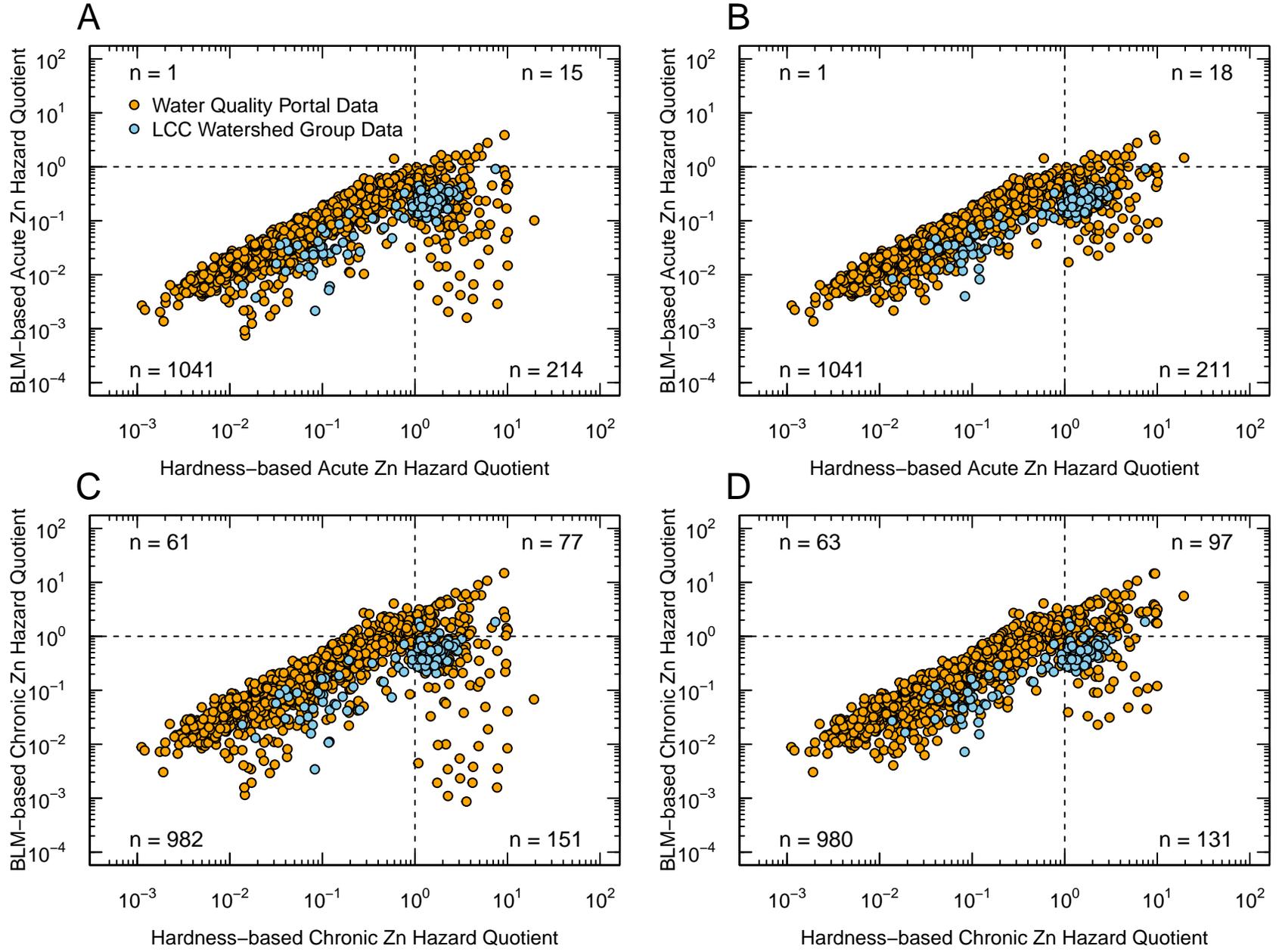


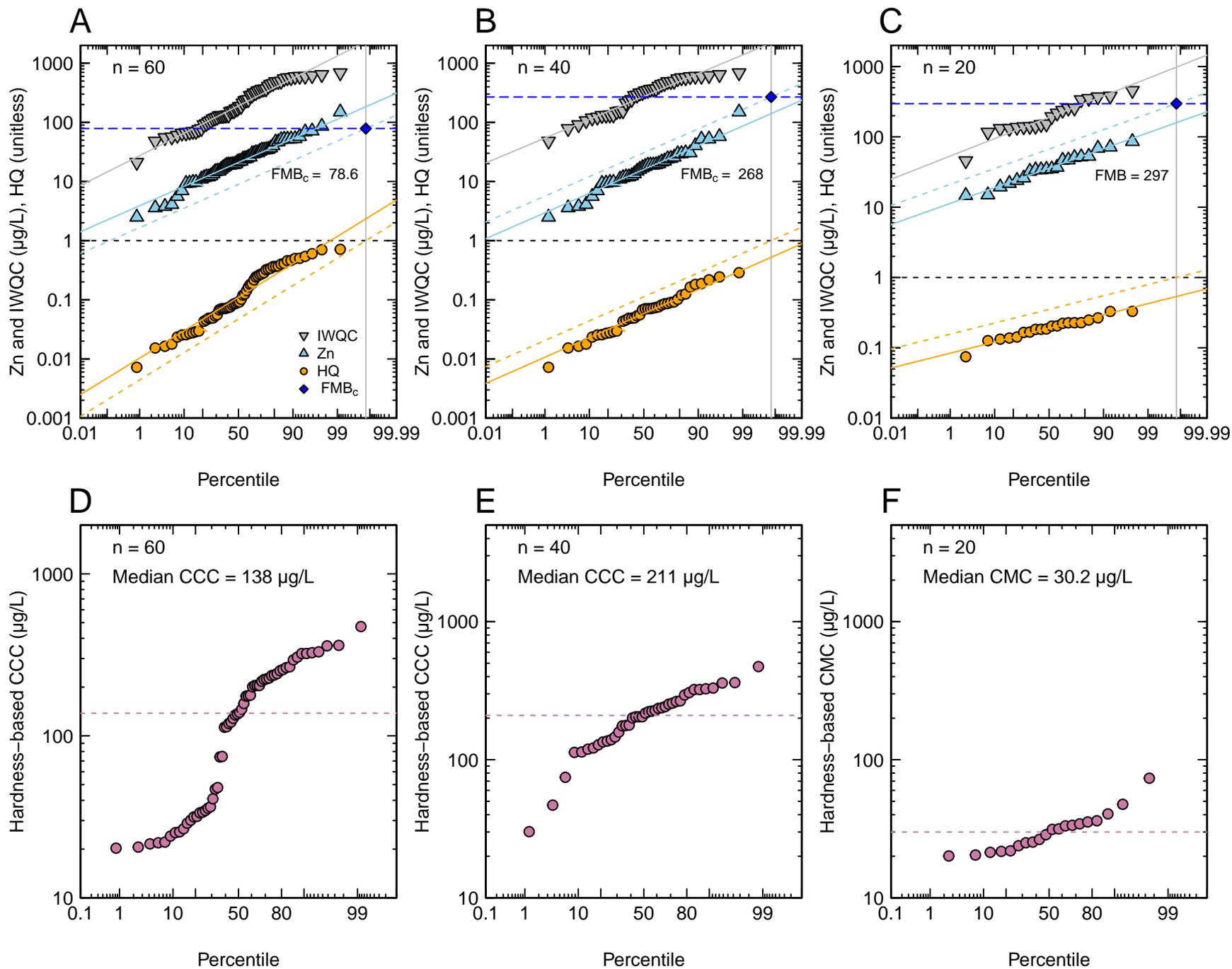
Revised Manuscript [12 February 2026] Figure 2



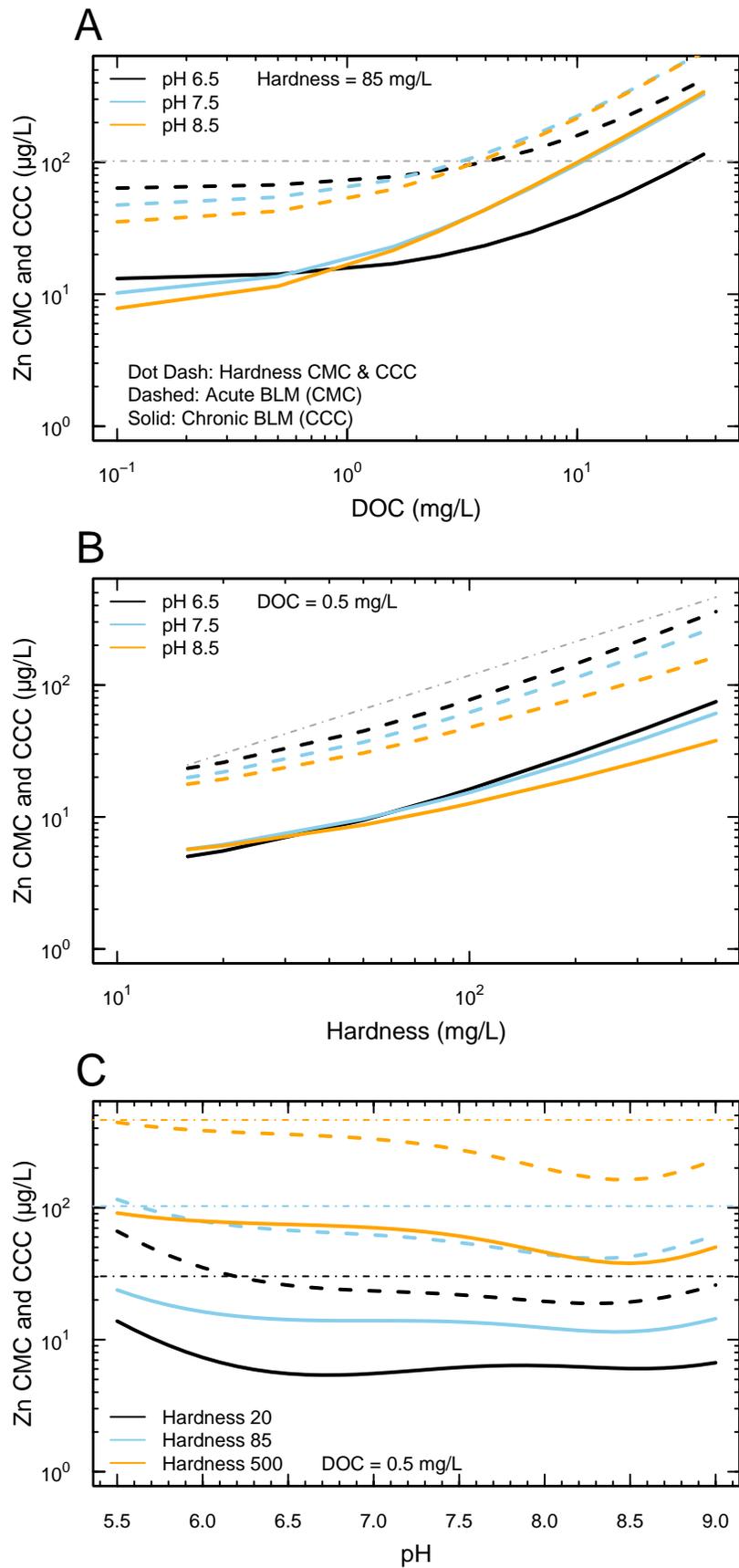


Revised Manuscript [12 February 2026] Figure 4





Revised Manuscript [12 February 2026] Figure 6



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Table 1. Starting values and constraints for parameters in PEST (Doherty 2019) application for Zn biotic ligand model (BLM) optimizations.

Taxa	Parameter	Starting Value¹	Minimum Value	Maximum Value
Invertebrates and Fish	log K BL-ZnOH	-2.4	-4.8	-1
	log K BL-Ca	3.8	2.2	5.9
	log K BL-Mg	3.3	1.7	5.4
	log K BL-Na	2.6	0.9	4.5
	Critical Accumulation (nmol/g ww)	1.27	0.01	30

¹Starting values taken from the unified Zn BLM described in DeForest and Van Genderen (2012)

BL = biotic ligand; ww = wet weight

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Table 2. Fitted parameters for unified zinc biotic ligand model (BLM) and unified multiple linear regression (MLR) model.

Unified Zn BLM			Unified Zn MLR Model		
Parameter		Value	Parameter		Value
Log K ^a	ZnOH	-2.447	Slope	pH	-0.200
	Ca	4.216		ln(DOC)	0.176
	Mg	3.772		ln(Hardness)	0.553
	Na	3.216			
Critical Accum. (nmol/g ww) ^b		FAV: 1.016 FCV: 0.1076	Intercept ^c		ND

^aLog K values for binding with biotic ligand; Log K values for BL-Zn and BL-H fixed at 5.4 and 6.4, respectively

^bSpecies-specific critical accumulations: *C. dubia* acute EC50: 1.3079; *D. magna* acute EC50: 4.2809; *D. pulex* acute EC50: 6.0497; *O. mykiss* acute EC50: 1.9804; *P. promelas* acute EC50: 2.2196; *P. paludosa* acute EC50: 1.985; *C. dubia* chronic EC20: 0.1366; *D. magna* chronic EC20: 0.3689; *L. stagnalis* chronic EC20: 2.6364; *O. mykiss* chronic EC20: 1.8458.

^cSpecies-specific intercepts: *C. dubia* acute EC50: 4.659; *D. magna* acute EC50: 5.777; *D. pulex* acute EC50: 5.744; *O. mykiss* acute EC50: 4.731; *P. promelas* acute EC50: ND; *P. paludosa* acute EC50: 5.101; *C. dubia* chronic EC20: ND; *D. magna* chronic EC20: 3.599; *L. stagnalis* chronic EC20: 5.096; *O. mykiss* chronic EC20: 4.811.

DOC = dissolved organic carbon; nmol/gw = nanomoles/gram wet weight; FAV = final acute value; FCV = final chronic value; ND = not determined; FAV and FCV intercepts not determined for unified MLR model.

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Table 3. Model performance metrics for the unified biotic ligand model (BLM), unified multiple linear regression (MLR) model, separately parameterized MLR models, and the hardness equation.

Model Source ^a	Model Type	Entire Dataset ^c		
		r ²	RF _{x,2.0}	Mean MPS ^d
This study	Unified BLM	0.75	0.82	0.78
[1]	Unified BLM	0.73	0.78	0.75
This study	Unified MLR	0.71	0.82	0.75
[2]	MLR ^b	0.72	0.81	0.78
[3]	Hardness	0.60	0.69	0.67

^aReferences: 1 = DeForest and Van Genderen 2012; 2 = DeForest et al. 2023; USEPA 1996.

^bSeparately parameterized acute and chronic MLR models.

^cr² and RF_{x,2.0} shown for the entire combined dataset. See Table S6 for a full tabulation of r² and RF_{x,2.0} by each species/endpoint.

^dModel performance score (MPS) shown as the mean MPS of the individual organism/endpoint data series. See Table S6 for a full tabulation of MPS by each species/endpoint.

EC_x = Effect concentration corresponding to 'x' effect level (e.g., 50% for acute and 20% for chronic).

RF_{x,2.0} = Fraction of predicted EC_x within 2-fold of observed EC_x.

DOC = dissolved organic carbon.

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Table 4. Unified Zn biotic ligand model (BLM)-normalized species mean acute values (SMAVs) and genus mean acute values (GMAVs) for the 20 most sensitive genera for which BLM normalization could be performed. Table S6 provides a complete summary for all 88 genera for which BLM normalizations could be performed. All data were normalized to synthetic US EPA moderately hard water conditions^a.

Genus species	Family	GMAV Rank	GMAV (µg/L)	SMAV (µg/L)
<i>Lymnaea stagnalis</i>	Lymnaeidae	20	510.9	510.9
<i>Anodonta imbecillis</i>	Unionidae	19	493.4	493.4
<i>Lampsilis straminea</i>	Unionidae	18	443.9	583.8
<i>Lampsilis rafinesqueana</i>	Unionidae			405.9
<i>Lampsilis siliquoidea</i>	Unionidae			369.2
<i>Thymallus arcticus</i>	Salmonidae	17	373.9	373.9
<i>Pimephales promelas</i>	Leuciscidae	16	349.8	349.8
<i>Daphnia pulex</i>	Daphniidae	15	333.7	901.1
<i>Daphnia magna</i>	Daphniidae			697.8
<i>Daphnia ambigua</i>	Daphniidae			536.1
<i>Daphnia galeata</i>	Daphniidae			500.8
<i>Daphnia carinata</i>	Daphniidae			348.7
<i>Daphnia lumholtzi</i>	Daphniidae			147.1
<i>Daphnia longispina</i>	Daphniidae			53.3
<i>Branchinecta lynchi</i>	Branchinectidae	14	331.7	524.2
<i>Branchinecta lindahli</i>	Branchinectidae			209.9
<i>Acipenser transmontanus</i>	Acipenseridae	13	329.2	329.2
<i>Limnodrilus hoffmeisteri</i>	Naididae	12	308.8	308.8
<i>Kryptolebias marmoratus</i>	Rivulidae	11	299.3	299.3
<i>Pomacea paludosa</i>	Ampullariidae	10	292.5	292.5
<i>Agosia chrysogaster</i>	Leuciscidae	9	267.9	267.9
<i>Actinonaias pectorosa</i>	Unionidae	8	266.1	266.1
<i>Thamnocephalus platyurus</i>	Thamnocephalidae	7	250.7	250.7
<i>Ceriodaphnia pulchella</i>	Daphniidae	6	191.3	837.2
<i>Ceriodaphnia dubia</i>	Daphniidae			132.4
<i>Ceriodaphnia reticulata</i>	Daphniidae			63.2
<i>Hyaella azteca</i>	Hyaellidae	5	172.2	172.2
<i>Lecane quadridentata</i>	Lecanidae	4	128.0	128.0
<i>Leptoxis ampla</i>	Pleuroceridae	3	126.0	126.0
<i>Euchlanis dilatata</i>	Euchlanidae	2	115.7	115.7
<i>Neocloeon triangulifer</i>	Baetidae	1	30.7	30.7

^aNormalization Conditions:

Temperature (C): 25, pH: 7.5, dissolved organic carbon (DOC; mg/L): 0.5, Ca (mg/L): 13.97, Mg (mg/L): 12.12, Na (mg/L): 26.3, K (mg/L): 2.1, SO₄ (mg/L): 81.3, Cl (mg/L): 1.9, Alkalinity (mg/L as CaCO₃): 60.5, Hardness (mg/L as CaCO₃): 84.79

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Table 5. Unified Zn biotic ligand model (BLM)-normalized species mean chronic values (SMCVs) and genus mean chronic values (GMCVs). All data were normalized to synthetic US EPA moderately hard water conditions^a.

Genus species	Family	GMCV Rank	GMCV (µg/L)	SMCV (µg/L)
<i>Rhithrogena hageni</i>	Heptageniidae	30	16292.7	16292.7
<i>Clistoronia magnifica</i>	Limnephilidae	29	10003.1	10003.1
<i>Ctenopharyngodon idella</i>	Xenocypridae	28	2411.9	2411.9
<i>Salvelinus fontinalis</i>	Salmonidae	27	1772.4	1772.4
<i>Pelteobagrus fulvidraco</i>	Bagridae	26	749.9	749.9
<i>Oncorhynchus tshawytscha</i>	Salmonidae	25	513.0	1233.1
<i>Oncorhynchus nerka</i>	Salmonidae			488.8
<i>Oncorhynchus clarkii</i>	Salmonidae			410.4
<i>Oncorhynchus mykiss</i>	Salmonidae			280.0
<i>Lymnaea stagnalis</i>	Lymnaeidae	24	392.2	392.2
<i>Chironomus tentans</i>	Chironomidae	23	322.7	322.7
<i>Salmo trutta</i>	Salmonidae	22	253.2	253.2
<i>Hydra vulgaris</i>	Hydridae	21	253.1	681.9
<i>Hydra viridissima</i>	Hydridae			94.0
<i>Velesunio ambiguus</i>	Hyriidae	20	156.6	156.6
<i>Alathyria profuga</i>	Hyriidae	19	153.8	153.8
<i>Dreissena polymorpha</i>	Dreissenidae	18	135.4	135.4
<i>Poecilia reticulata</i>	Poeciliidae	17	123.8	123.8
<i>Acipenser transmontanus</i>	Acipenseridae	16	119.7	119.7
<i>Hyridella drapeta</i>	Hyriidae	15	117.1	124.4
<i>Hyridella depressa</i>	Hyriidae			120.8
<i>Hyridella australis</i>	Hyriidae			106.8
<i>Cucumerunio novaehollandiae</i>	Hyriidae	14	105.0	105.0
<i>Daphnia pulex</i>	Daphniidae	13	93.9	157.8
<i>Daphnia magna</i>	Daphniidae			55.8
<i>Pimephales promelas</i>	Leuciscidae	12	89.7	89.7
<i>Jordanella floridae</i>	Cyprinodontidae	11	80.6	80.6
<i>Brachionus calyciflorus</i>	Brachionidae	10	77.2	162.5
<i>Brachionus rubens</i>	Brachionidae			36.7
<i>Anuraeopsis fissa</i>	Brachionidae	9	74.7	74.7
<i>Cottus bairdi</i>	Cottidae	8	71.8	71.8
<i>Phoxinus phoxinus</i>	Leuciscidae	7	71.2	71.2
<i>Hyaella azteca</i>	Hyaellidae	6	50.8	50.8
<i>Corbicula sp.</i>	Cyrenidae	5	23.9	23.9
<i>Ceriodaphnia dubia</i>	Daphniidae	4	22.1	22.1
<i>Potamopyrgus jenkinsi</i>	Tateidae	3	19.7	19.7
<i>Lampsilis siliquoidea</i>	Unionidae	2	18.9	18.9
<i>Neocloeon triangulifer</i>	Baetidae	1	16.5	16.5

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^aNormalization Conditions:

Temperature (C): 25, pH: 7.5, dissolved organic carbon (DOC; mg/L): 0.5, Ca (mg/L): 13.97, Mg (mg/L): 12.12, Na (mg/L): 26.3, K (mg/L): 2.1, SO₄ (mg/L): 81.3, Cl (mg/L): 1.9, Alkalinity (mg/L as CaCO₃): 60.5, Hardness (mg/L as CaCO₃): 84.79

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Table 6. Summary of unified Zn biotic ligand model (BLM)-based acute and chronic fixed monitoring benchmark (FMB) calculations for the Los Cerritos Channel (LCC) monitoring dataset

Location ID	Sample Type	Criteria Type	BLM-based FMB ($\mu\text{g/L}$)	Hardness-based median WQC ($\mu\text{g/L}$)	IWQC Percentile at FMB	$r_{\text{Zn vs. IWQC}}$
LCC1	Combined Dry Weather, Compliance, and Wet Weather Samples	Chronic	78.6	138	14	0.039
LCC1	Combined Dry Weather and Compliance Samples	Chronic	268	211	49	0.41
LCC1	Wet Weather Samples	Acute	297	30.2	79	0.78
SB4	Wet Weather Samples	Acute	387	27.2	95	0.82
SB8	Wet Weather Samples	Acute	334	22.7	83	0.91
SB9	Wet Weather Samples	Acute	403	31.1	84	0.94
SB10	Wet Weather Samples	Acute	232	23.6	59	0.64

WQC = Water quality criteria

IWQC = Instantaneous water quality criteria

r = Pearson's correlation coefficient