

**Bacteria Indicator Supplement**  
**Flint River Basin – 2003 Fecal Coliform TMDL**  
**Action ID: GAR4\_22\_11\_18**

As part of the 2019 Water Quality Standards Triennial Review, Georgia proposed *E. coli* and enterococci criteria for waters designated as fishing, coastal fishing, and drinking water to protect recreators who may inadvertently ingest water. Enterococci is the bacterial indicator for estuarine water, while *E. coli* is the bacterial indicator for all other waters. *E. coli* and enterococci have a better correlation with gastrointestinal illness than fecal coliform, and the *E. coli* and enterococci criteria are as protective of the fecal coliform criterion. Georgia EPD adopted the primary contact criteria for the recreational months, May through October, when immersion is expected to occur, and there is a higher likelihood of water ingestion. For non-recreational months, November through April, EPD adopted secondary contact criteria based on the estimated incidental water consumption rate from the 2019 update to Chapter 3 of the EPA Exposure Factors Handbook, Ingestion of Water and Other Select Liquids. Prior to these changes, fecal coliform was the bacterial indicator for the designated uses described above.

This supplement was developed to document the translation of the fecal coliform calculations to the new bacteria indicator, either *E. coli* or enterococci, for segments listed in the existing approved Total Maximum Daily Load (TMDL) document. To the extent that the existing approved TMDL document makes specific permitting recommendations based on fecal coliform, those recommendations will be translated to the approved bacteria indicator in all permits.

The loading curve approach was used to determine the allowable summer and winter seasonal loads. For waterbodies designated as recreational waters, a single curve represents the TMDL and is the 30-day recreational geometric mean criteria for the various bacterial indicators. For waterbodies designated as fishing, coastal fishing, and drinking water, two curves represent the TMDL. One curve represents the summer TMDL for the period May through October when the 30-day geometric mean water quality criteria are equal to the primary contact recreation bacteria criteria for the various indicators, and the second curve represents the winter TMDL for the period November through April when the 30-day geometric mean criteria are higher and are equal to the secondary contact recreation bacteria criteria.

The TMDL also has a single sample maximum criterion for fecal coliform or a Statistical Threshold Value (STV) for *E. coli* and enterococci. The single sample maximum applies for the months of November through April; whereas, the STV applies year round. The STV shall not be exceeded more than 10% of the time in a 30-day period. If a single sample exceeds the maximum criterion or the STV and a geometric mean criterion was also exceeded, then the TMDL is based on the criteria exceedance requiring the largest load reduction. The difference between the critical load and the TMDL curve represented the load reduction required for the stream segment to meet the appropriate instream standard.

The TMDL calculation is given using the following equation:

$$\text{TMDL} = C_{\text{standard}} \times Q$$

Where: TMDL = Total Maximum Bacteria Load either as a 30-day geometric mean or a single sample maximum  
 $C_{\text{standard}}$  = applicable state water quality standard  
Q = stream flow

The applicable water quality standard for fecal coliform was:

- May-October 200 counts/100 mL (as a 30-day geometric mean)
- November-April 1,000 counts/100 mL (as a 30-day geometric mean)
- November-April 4,000 counts/100 mL (as a single sample maximum)

The applicable water quality standard for *E. coli* is:

- May-October 126 counts/100 mL (as a 30-day geometric mean)
- May-October 410 counts/100 mL (as a STV)
- November-April 265 counts/100 mL (as a 30-day geometric mean)
- November-April 861 counts/100 mL (as a STV)

The applicable water quality standard for enterococci is:

- May-October 35 counts/100 mL (as a 30-day geometric mean)
- May-October 130 counts/100 mL (as a STV)
- November-April 74 counts/100 mL (as a 30-day geometric mean)
- November-April 273 counts/100 mL (as a STV)

TMDLs are the sum of all wasteload allocations (WLA) plus load allocation (LA) plus a margin of safety (MOS), or, stated as an equation,  $TMDL = \sum WLA + \sum LA + MOS$ . The MOS can be either implicit or explicit. For bacteria TMDLs, the practice has been to allocate an explicit ten percent MOS. TMDLs have given WLAs for all point sources equivalent to the recreational 30-day geometric mean criteria. The LA has also been given as the appropriate seasonal 30-day geometric mean criteria.

The wasteload allocation (WLA) is the portion of the receiving water's loading capacity that is allocated to existing or future point sources. WLAs were provided to the point sources with municipal wastewater treatment systems and to point sources with sanitary waste streams. Industrial wastewater treatment systems may also receive a WLA if they discharge bacteria because of the type of treatment processes employed or due to commingled sanitary waste streams.

For permitted point sources identified in the original TMDL, the WLAs were calculated based on permitted or design flow and primary recreation season bacteria criteria and are expressed as an accumulated load over a 30-day period and presented in units of counts per 30 days. If a facility expands its capacity and the permitted flow increases, the WLA for the facility would increase in proportion to the flow. If there is a new facility, the WLA would be the design flow times the summertime bacteria criteria. The established WLAs will meet the applicable water quality criteria. In addition, the permits may include routine monitoring and reporting requirements.

The reasonable assurance language included in the original TMDL in Section 6.3 shall be considered superseded and replaced by the following language.

The GA EPD is responsible for administering and enforcing laws to protect the waters of the State. Reasonable assurance ensures that a TMDL's wasteload and load allocations are properly distributed to meet the applicable water quality standards. Without such distribution, a TMDL's ability to serve as an effective guidepost for water quality improvement is significantly diminished. Federal regulations implementing the CWA require that effluent limits in permits be consistent with "the assumptions and requirements of any available [WLA]" in an approved TMDL [40 CFR 122.44(d)(1)(vii)(B)]. NPDES point source permits will be given effluent limits in the permit consistent with the individual WLAs specified in the TMDL.

The GA EPD is the lead agency for implementing the State's Nonpoint Source Management Program. Regulatory responsibilities that have a bearing on nonpoint source pollution include establishing water quality standards and use classifications, assessing and reporting water quality conditions, and regulating land use activities that may affect water quality. Georgia works with local governments, agricultural and forestry agencies, such as the Natural Resources Conservation Service, the Georgia Soil and Water Conservation Commission, and the Georgia Forestry Commission, to foster the implementation of best management practices to address nonpoint sources. In addition, public education efforts will be targeted to individual stakeholders to provide information regarding the use of best management practices to protect water quality.

**Table 15a. *E. coli* WLAs Required**

Facility Name	Permit No.	Receiving Stream	Listed Stream Segment	Bacteria Indicator	WLA (counts/30 days)
Byromville Pond	GA0025623	Turkey Creek	Turkey Creek	E. coli	1.49E+10
Camilla WPCP	GA0020362	Big Slough Creek	Big Slough - Near Pelham	E. coli	Plant Closed
Concord South #1	GA0025470	Elkins Creek	Elkins Creek - Bull Creek to Flint River near Molena	E. coli	1.44E+11
Cordele WPCP	GA0024503	Gum Creek	Gum Creek - Downstream Cordele to Lake Blackshear	E. coli	7.18E+11
Griffin Potato Cr WPCP	GA0030791	Potato Creek	Potato Creek - U.S. Hwy 333 to Upson Co. Line	E. coli	2.87E+11
Hampton WPCP	GA0020320	Bear Creek	Flint River - Woolsey Rd. to Horton Creek	E. coli	2.87E+11
Marshallville WPCP	GA0047431	Spring Hill Creek	Beaver Creek - Spring Hill Creek to Flint River	E. coli	1.72E+10
Smithville Pond	GA0047422	Muckaloochee Creek	Muckaloochee Creek - Smithville Pond (aka Wells Mill Pond) to Muckalee Creek	E. coli	1.72E+10
South Hampton MHP	GA0025305	Unnamed Trib To Thomason Creek	Flint River - Woolsey Rd. to Horton Creek	E. coli	1.44E+10

**Table 16a. *E. coli* Loads Required**

Stream Segment <sup>a</sup>	Location	Bacteria Indicator	Current Load (counts/30 days)	TMDL Components					Percent Reduction
				WLA <sup>1</sup> (counts/30 days)	WLASw (counts/30 days)	LA (counts/30 days)	MOS (counts/30 days)	TMDL (counts/30 days)	
Beaver Creek GAR031300060108	Spring Hill Creek to Flint River (Macon Co.)	E. Coli	2	6.28E+09		1.45E+12	1.62E+11	1.62E+12	Undetermined <sup>3</sup>
Bell Creek GAR031300050904	Headwaters, downstream Thomaston, to Potato Creek (Upson Co.)	E. Coli	2			5.24E+10	5.82E+09	5.82E+10	Undetermined <sup>3</sup>
Big Slough GAR031300080501	Near Pelham (Mitchell Co.)	E. Coli	2			2.51E+12	2.79E+11	2.79E+12	Undetermined <sup>3</sup>
Camp Creek GAR031300050131, GAR031300050130	Headwaters to Cater Creek; Cater Creek to Flint River (Clayton Co.)	E. Coli	2		9.70E+10	2.13E+11	3.44E+10	3.44E+11	Undetermined <sup>3</sup>
Cooleewahee Creek GAR031300080301	Piney Woods Branch to Flint River near Newton (Dougherty, Baker Co.)	E. Coli	2			7.62E+10	8.44E+09	8.44E+10	Undetermined <sup>3</sup>
Elkins Creek GAR031300050602	Bull Creek to Flint River near Molena (Pike, Upson Co.)	E. Coli	2	1.44E+11		1.06E+12	1.18E+11	1.32E+12	Undetermined <sup>3</sup>
Flint River GAR031300050110	Upstream Hartsfield Airport (Clayton Co.)	E. Coli	2		6.74E+11	4.85E+11	1.29E+11	1.29E+12	Undetermined <sup>3</sup>
Flint River GAR031300050106	Hartsfield Airport to Hwy 138 (Clayton Co.)	E. Coli	2		7.75E+11	5.28E+11	1.45E+11	1.45E+12	Undetermined <sup>3</sup>
Flint River GAR031300050107	Hwy 138 to N. Hampton Road (Clayton Co.)	E. Coli	2		3.58E+11	9.45E+11	1.45E+11	1.45E+12	Undetermined <sup>3</sup>
Flint River GAR031300050118	Woolsey Rd. to Horton Creek (Clayton/Fayette/Spalding Co.)	E. Coli	2	5.45E+10	5.42E+11	2.91E+12	3.90E+11	3.90E+12	Undetermined <sup>3</sup>
Fowltown Creek GAR031300070603	Downstream Armena Rd. to Kinchafoonee Creek (Lee Co.)	E. Coli	2			1.04E+13	1.15E+12	1.15E+13	Undetermined <sup>3</sup>
Gum Creek GAR031300060606	Downstream Cordele to Lake Blackshear (Crisp Co.)	E. Coli	2	2.38E+11		6.12E+11	9.45E+10	9.45E+11	Undetermined <sup>3</sup>
Lanahassee Creek GAR031300070201	W. Fork Lanahassee Creek to Kinchafoonee Creek (Webster Co.)	E. Coli	2			8.38E+11	9.32E+10	9.32E+11	Undetermined <sup>3</sup>
Lime Creek GAR031300060514	Little Lime Creek to Lake Blackshear (Sumter Co.)	E. Coli	2			5.51E+11	6.12E+10	6.12E+11	Undetermined <sup>3</sup>
Muckaloochee Creek GAR031300070902	Smithville Pond (aka Wells Mill Pond) to Muckalee Creek (Lee Co.)	E. Coli	2	5.73E+09		3.56E+11	4.02E+10	4.02E+11	Undetermined <sup>3</sup>

Stream Segment <sup>a</sup>	Location	Bacteria Indicator	Current Load (counts/30 days)	TMDL Components					Percent Reduction
				WLA <sup>1</sup> (counts/30 days)	WLASw (counts/30 days)	LA (counts/30 days)	MOS (counts/30 days)	TMDL (counts/30 days)	
Mud Creek GAR031300050112	Headwaters to Flint River near Hapeville (Fulton/Clayton Co.)	E. Coli	2		#VALUE!	1.97E+12	5.92E+11	5.92E+12	Undetermined <sup>3</sup>
Patsiliga Creek GAR031300051312	Beaver Creek to Flint River, Butler (Taylor Co.)	E. Coli	2			1.21E+12	1.34E+11	1.34E+12	Undetermined <sup>3</sup>
Potato Creek GAR031300050919	U.S. Hwy 333 to Upson Co. Line (Lamar Co.)	E. Coli	2	1.73E+11		3.72E+11	6.05E+10	6.05E+11	Undetermined <sup>3</sup>
Red Oak Creek GAR031300050508	Little Red Oak Creek to Flint River near Imlac (Meriwether Co.)	E. Coli	2			1.12E+12	1.25E+11	1.25E+12	Undetermined <sup>3</sup>
Sullivan Creek GAR031300050128, GAR031300050129	Headwaters to Unnamed tributary at I-285; Unnamed tributary at I-285 to Flint River (Clayton Co.)	E. Coli	2		1.68E+11	9.70E+10	2.94E+10	2.94E+11	Undetermined <sup>3</sup>
Swift Creek GAR031300051009	Tobler Creek to Flint River (Upson Co.)	E. Coli	2			4.73E+11	5.25E+10	5.25E+11	Undetermined <sup>3</sup>
Swift Creek GAR031300060608	Upstream Lake Blackshear (Turner, Crisp Co.)	E. Coli	2			4.31E+11	4.79E+10	4.79E+11	Undetermined <sup>3</sup>
Tributary to Flint River		E. Coli	2		1.07E+11	7.75E+10	2.05E+10	2.05E+11	Undetermined <sup>3</sup>
Turkey Creek GAR031300050306	Newnan to Reese Lake (Coweta Co.)	E. Coli	2	2.08E+09		3.28E+11	3.67E+10	3.67E+11	Undetermined <sup>3</sup>
Ulcohatchee Creek GAR031300051206	Headwaters to Auchumpkee Creek (Crawford Co.)	E. Coli	2			7.62E+10	8.44E+09	8.44E+10	Undetermined <sup>3</sup>
Whitewater Creek GAR031300051506	Big Whitewater Creek to Cedar Creek (Taylor, Macon Co.)	E. Coli	2			7.88E+12	8.76E+11	8.76E+12	Undetermined <sup>3</sup>
Whitewater Creek GAR031300051505	Cedar Creek to Flint River (Macon Co.)	E. Coli	2			2.13E+13	2.36E+12	2.36E+13	Undetermined <sup>3</sup>
Wildcat Creek GAR031300050117	Headwaters to Flint River (Spalding Co.)	<i>E. Coli</i>	2			3.58E+11	4.16E+10	4.16E+11	Undetermined <sup>3</sup>

Notes:

- (1) The assigned bacteria load from the NPDES permitted facility for WLA was determined as the product of the *E. coli* permit limit and the facility average monthly discharge at the time of the critical load.
- (2) Samples were not analyzed for *E. coli*, therefore critical load calculation not possible
- (3) Percent reduction could not be determined due to absence of current load calculation
- (a) Stream segments identified in Table 16a with multiple ID numbers (GAR###) represent segments that have been split into smaller subsections in the biennial 305(b)/303(d) list of waters since the original issuance of the approved TMDL.