

Total Maximum Daily Load
Evaluation
for
Nine Stream Segments
in the
Ogeechee River Basin
for
Bacteria

Submitted to:
The U.S. Environmental Protection Agency
Region 4
Atlanta, Georgia

Submitted by:
The Georgia Department of Natural Resources
Environmental Protection Division
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EXECUTIVE SUMMARY

The State of Georgia Environmental Protection Division (GA EPD) assesses its waterbodies for compliance with water quality criteria established for their designated uses as required by the Federal Clean Water Act (CWA). Assessed waterbodies are placed into one of three categories, supporting designated use, not supporting designated use, or assessment pending, depending on water quality assessment results. These waterbodies are found on Georgia's 2022 305(b) list as required by that section of the CWA that defines the assessment process and are published in *Water Quality in Georgia 2020-2021* (GA EPD, 2022). This document is available on the Georgia Environmental Protection Division (GA EPD) [website](#).

The subset of the waterbodies that do not meet designated uses on the 305(b) list are also assigned to Georgia's 303(d) list, named after that section of the CWA. Although the 305(b) and 303(d) lists are two distinct requirements under the CWA, Georgia reports both lists in one combined format called the Integrated 305(b)/303(d) List, which is found in Appendix A of *Water Quality in Georgia 2020-2021* (GA EPD, 2022). Waterbodies on the 303(d) list are denoted as Category 5, and are required to have a Total Maximum Daily Load (TMDL) evaluation for the water quality constituent(s) in violation of the [water quality standard\(s\)](#).

The TMDL formulations in this document are based on impaired segments contained in the [2022 305\(b\)/303\(d\) List](#). The TMDL process establishes the allowable pollutant loadings or other quantifiable parameters for a waterbody based on the relationship between pollutant sources and instream water quality conditions. This allows water quality-based controls to be developed to reduce pollution and restore and maintain water quality.

Every waterbody in the State has one or more designated uses, and each designated use has water quality criteria established to protect it. Waterbodies in Georgia are assessed based on the [305\(b\)/303\(d\) Listing Assessment Methodology](#) included in Appendix A of *Water Quality in Georgia 2020-2021*, as such GA EPD has placed seven (7) stream segments in the Ogeechee River Basin on the 303(d) list of impaired waters because it was assessed as "not supporting" its designated use of "Fishing" due to violation of the fecal coliform water quality criteria. The EPA approved water quality criteria in place when the 2022 Integrated 305(b)/303(d) List was developed and approved are as follows:

For the months of May through October, when water contact recreation activities are expected to occur, fecal coliform not to exceed a geometric mean of 200 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. Should water quality and sanitary studies show fecal coliform levels from non-human sources exceed 200 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean fecal coliform shall not exceed 300 counts per 100 mL in lakes and reservoirs and 500 counts per 100 mL in free flowing freshwater streams. For the months of November through April, fecal coliform not to exceed a geometric mean of 1,000 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours and not to exceed a maximum of 4,000 counts per 100 mL for any sample. The State does not encourage swimming in these surface waters since a number of factors which are beyond the control of any State regulatory agency contribute to elevated levels of bacteria.

For waters designated as shellfish growing areas by the Georgia DNR Coastal Resources Division, the requirements will be consistent with those established by the State and Federal agencies responsible for the National Shellfish Sanitation Program. The requirements are found in National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish, 2007 Revision (or most recent version), Interstate Shellfish Sanitation Conference, U.S. Food and Drug Administration.

A waterbody is assessed as “not supporting” its use if more than ten percent of the geometric means are greater than their seasonal waterbody specific criteria or if more than ten percent of the samples exceed the single sample criteria.

In January 2022, the Georgia DNR Board adopted new bacteria criteria for “Fishing” and “Drinking Water” designated uses using the bacterial indicators *E. coli* and enterococci. These bacteria are better indicators for human health illnesses. The adopted criteria have the same estimated illness rate (8 per 1000 swimmers) as the previously established fecal coliform criteria. EPA approved the proposed revisions to Georgia’s water quality standards August 31, 2022. The current bacteria water quality criteria for waters with the “Fishing” designated use are as follows:

Bacteria:

1. Estuarine waters: For the months of May through October, when primary water contact recreation activities are expected to occur, culturable enterococci not to exceed a geometric mean of 35 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 130 counts per 100 mL the same 30-day interval.

For the months of November through April, culturable enterococci not to exceed a geometric mean of 74 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 273 counts per 100 mL in the same 30-day interval.

2. All other fishing waters: For the months of May through October, when primary water contact recreation activities are expected to occur, culturable *E. coli* not to exceed a geometric mean of 126 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an *E. coli* statistical threshold value (STV) of 410 counts per 100 mL in the same 30-day interval.

For the months of November through April, culturable *E. coli* not to exceed a geometric mean of 265 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an *E. coli* statistical threshold value (STV) of 861 counts per 100 mL in the same 30-day interval.

3. The State does not encourage swimming in these surface waters since a number of factors which are beyond the control of any State regulatory agency contribute to elevated levels of bacteria.

4. For waters designated as shellfish growing areas by the Georgia DNR Coastal Resources Division, the requirements will be consistent with those established by the State and Federal agencies responsible for the National Shellfish Sanitation Program. The requirements are found in National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish, 2007 Revision (or most recent version), Interstate Shellfish Sanitation Conference, U.S. Food and Drug Administration.

Since this TMDL was written after EPA approved the new bacteria criteria, the TMDL will use both fecal coliform and the appropriate indicator identified above based on estuarine/non-estuarine status. Where fecal coliform and *E. coli* were sampled concurrently, the *E. coli* current load can be determined, and the percentage reduction calculated. For impaired waters where only fecal coliform was sampled, the current *E. coli* or enterococci load cannot be determined. In this case the TMDL will use a conversion factor to convert from fecal coliform criteria to *E. coli* or enterococci criteria, based on the respective 30-day geometric mean water quality standard. For non-estuarine waters, a conversion factor of 0.63 will be used to translate the fecal coliform TMDL to

E. coli. For estuarine waters, a conversion factor of 0.175 will be used to translate the fecal coliform TMDL to enterococci.

A waterbody is assessed as “not supporting” its use if more than ten percent of the geometric means are greater than their seasonal criteria or if more than ten percent of the samples exceeded the STV water quality criteria cited above. An important part of the TMDL analysis is the identification of potential source categories. Sources are broadly classified as either point or nonpoint sources. A point source is defined as a discernable, confined, and discrete conveyance from which pollutants are or may be discharged to surface waters. Nonpoint sources are diffuse, and generally, but not always, involve accumulated fecal coliform bacteria that wash off land surfaces following storm events.

The process of developing fecal coliform bacteria TMDLs for listed segments in the Ogeechee River Basin involved the determination of the following:

- The current critical bacterial load to the stream under existing conditions;
- The TMDL for similar conditions under which the current critical load was determined; and
- The percent reduction in the current critical bacterial load necessary to achieve the TMDL.

The calculation of the bacterial load at any point in a stream requires the bacterial concentration and stream flow. The availability of water quality and flow data varies considerably among the listed segments. The Loading Curve Approach was used to determine the current fecal coliform load and TMDL. The bacterial loads and required reductions for each of the listed segments are summarized in Table 1 below.

This document also includes revised TMDLs for stream segments that had TMDLs developed by USEPA using the BASINS watershed modeling approach. In the mid-2000s, GA EPD revised a majority of fecal coliform TMDLs that had been developed using BASINS. The revised TMDLs are being included to ensure that all previously issued fecal coliform TMDL calculations use the Loading Curve Approach and include WLAs and TMDLs for the new bacterial indicators. The bacterial loads for each revised segment are summarized in Table 1 below.

Point and nonpoint source management practices should be used to help reduce bacteria source loads. The amount of bacteria delivered to a stream is difficult to determine. However, the use of management practices should improve stream water quality, and future monitoring will provide a measurement of TMDL implementation.

Table 1: Bacterial Loads and Required Bacterial Load Reductions

AUID	Stream Segment	Description	Bacterial Indicator	Current Load (counts/ 30 days)	TMDL Components					Reduction Required
					WLA (counts/ 30 days) ⁽¹⁾	WLASw (counts/ 30 days)	LA (counts/ 30 days)	MOS (counts/ 30 days)	TMDL (counts/ 30 days)	
GAR030602010613	Buckhead Creek	Eightmile Creek to Rocky Creek	Fecal coliform	1.08E+12	--	--	3.69E+11	4.10E+10	4.10E+11	62.1%
			<i>E. coli</i>	⁽²⁾	--	--	2.32E+11	2.58E+10	2.58E+11	Undetermined ⁽³⁾
GAR030602040120	Bull River	Richardson Creek to Lazaretto River	Fecal coliform	72.3*Q	--	--	14* Q _{LA} ⁽⁵⁾	1.4* Q _{Total} ⁽⁵⁾	14*Q _{Total}	68.2%
			enterococci	⁽²⁾	--	35 x Q _{WLASw} ⁽⁵⁾	35 x Q _{LA} ⁽⁵⁾	3.5 x Q _{Total} ⁽⁵⁾	35 x Q _{Total} ⁽⁵⁾	Undetermined ⁽³⁾
GAR030602010409	Ogeechee River	Spring Creek to Williamson Swamp Creek	Fecal coliform	8.43E+11	3.40E+10	--	6.70E+11	7.83E+10	7.83E+11	7.2%
			<i>E. coli</i>	⁽²⁾	2.14E+10	--	4.22E+11	4.93E+10	4.93E+11	Undetermined ⁽³⁾
GAR030602020305	Ogeechee River	Long Branch to Nevills Creek	Fecal coliform	4.13E+12	1.11E+10	--	1.37E+12	1.54E+11	1.54E+12	62.7%
			<i>E. coli</i>	⁽²⁾	7.01E+09	--	8.65E+11	9.69E+10	9.69E+11	Undetermined ⁽³⁾
GAR030602020511	Tributary to Mill Creek	Unnamed Tributary 0.3 miles upstream Sims Road to Mill Creek	Fecal coliform	2.88E+10	4.10E+09	--	8.73E+09	1.43E+09	1.43E+10	50.6%
			<i>E. coli</i>	⁽²⁾	2.58E+09	--	5.50E+09	8.98E+08	8.98E+09	Undetermined ⁽³⁾
GAR030602040213	Tributary to Salt Creek	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway	Fecal coliform	1.67E+10	--	1.38E+09	2.29E+09	4.07E+08	4.07E+09	75.6%
			<i>E. coli</i>	⁽²⁾	--	8.67E+08	1.44E+09	2.56E+08	2.56E+09	Undetermined ⁽³⁾
GAR030602020509	Upper Black Creek	Crombly Pond to Lower Black Creek	Fecal coliform	1.13E+12	--	--	4.44E+11	4.93E+10	4.93E+11	56.3%
			<i>E. coli</i>	8.59E+11	--	--	1.77E+11	1.97E+10	1.97E+11	77.1%
Revised TMDLs										
GAR030602020301	Jackson Branch	Downstream King Finishing Company from SR17 to Ogeechee River, Dover	Fecal coliform	⁽⁴⁾	--	--	6.49E+10	7.21E+09	7.21E+10	Undetermined ⁽³⁾
			<i>E. coli</i>	⁽⁴⁾	--	--	4.09E+10	4.54E+09	4.54E+10	Undetermined ⁽³⁾
GAR030602020303	Jackson Branch	Upstream King Finishing Company from SR 17 to County Road 39, Dover	Fecal coliform	⁽⁴⁾	--	--	6.13E+10	6.81E+09	6.81E+10	Undetermined ⁽³⁾
			<i>E. coli</i>	⁽⁴⁾	--	--	3.86E+10	4.29E+09	4.29E+10	Undetermined ⁽³⁾

Notes:

- (1) The assigned bacterial load from the NPDES permitted facility for WLA was determined as the product of the permitted flow and bacteria permit limit.
- (2) Sample was 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.
- (4) Critical loading could not be determined due to no samples collected.
- (5) This segment is tidal in nature. Therefore WLAsw, load allocation, MOS and the TMDL are expressed as a function of the flow Q at any given time.

1.0 INTRODUCTION

1.1 Background

The State of Georgia assesses its waterbodies for compliance with water quality criteria established for their designated uses as required by the CWA. Assessed waterbodies are placed into one of three categories, supporting designated use, not supporting designated use, or assessment pending, depending on water quality assessment results. These waterbodies are found on Georgia's 2022 305(b) list as required by that section of the CWA that defines the assessment process and are published in *Water Quality in Georgia 2020-2021* (GA EPD, 2022). This document is available on the GA EPD [website](#).

The subset of the waterbodies that do not meet designated uses on the 305(b) list are also assigned to Georgia's 303(d) list, named after that section of the CWA. Although the 305(b) and 303(d) lists are two distinct requirements under the CWA, Georgia reports both lists in one combined format called the Integrated 305(b)/303(d) List, which is found in Appendix A of *Water Quality in Georgia 2020-2021* (GA EPD, 2022). Waterbodies on the 303(d) list are denoted as Category 5, and are required to have a Total Maximum Daily Load (TMDL) evaluation for the water quality constituent(s) in violation of the [water quality standard](#).

The TMDL formulations in this document are based on impaired segments contained in the [2022 305\(b\)/303\(d\) List](#). The TMDL process establishes the allowable pollutant loadings or other quantifiable parameters for a waterbody based on the relationship between pollutant sources and instream water quality conditions. This allows water quality-based controls to be developed to reduce pollution and restore and maintain water quality.

The 303(d) list identifies the stream segments that are not supporting its designated use classification due to exceedances of water quality standards for bacteria. Fecal coliform, *E. coli*, and enterococci bacteria are used as indicators of the potential presence of pathogens in a stream. Table 2 presents the seven (7) stream segments in the Ogeechee River Basin included on the 2022 303(d) list for exceedances of the fecal coliform criteria. Table 3 lists the two (2) stream segments in the Ogeechee River Basin where the previously approved TMDLs are being revised.

Table 2: Stream Segments Listed on the 2022 303(d) List for Bacteria in the Ogeechee River Basin

Stream Segment	Location	Assessment Unit ID	Segment Length (miles)	Designated Use	Estuarine Status
Buckhead Creek	Eightmile Creek to Rocky Creek	GAR030602010613	5.2	Fishing	Non-estuarine
Bull River	Richardson Creek to Lazaretto River	GAR030602040120	5	Fishing	Estuarine
Ogeechee River	Spring Creek to Williamson Swamp Creek	GAR030602010409	9	Fishing	Non-estuarine
Ogeechee River	Long Branch to Nevills Creek	GAR030602020305	12	Fishing	Non-estuarine

Stream Segment	Location	Assessment Unit ID	Segment Length (miles)	Designated Use	Estuarine Status
Tributary to Mill Creek	Unnamed tributary 0.3 miles upstream Sims Road to Mill Creek	GAR030602020511	5	Fishing	Non-estuarine
Tributary to Salt Creek	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway	GAR030602040213	1.3	Fishing	Non-estuarine
Upper Black Creek	Crombly Pond to Lower Black Creek	GAR030602020509	12	Fishing	Non-estuarine

Table 3: Stream Segments with Revised TMDLs for Bacteria in the Ogeechee River Basin

Stream Segment	Location	Assessment Unit ID	Segment Length (miles)	Designated Use	Estuarine Status	Original TMDL Action ID Number, Agency, and Year
Jackson Branch	Upstream King Finishing Company from SR 17 to County Road 39, Dover	GAR030602020303	2	Fishing	Non-estuarine	#568 US EPA 1998
Jackson Branch	Downstream King Finishing Company from SR17 to Ogeechee River, Dover	GAR030602020301	1	Fishing	Non-estuarine	#568 US EPA 1998

1.2 Watershed Description

The Ogeechee River Basin is located in mid to southeastern Georgia, encompassing approximately 5,540 square miles. (EPD, 2003). It is bordered by the Oconee and Altamaha River Basins to the west and the Savannah River Basin to the east. The Ogeechee River originates in Greene County, in central Georgia. The headwaters of the Ogeechee River consist of the North and South Forks, which join to form the mainstem. The River then flows approximately 245 miles southeast to the Atlantic Ocean. The Canoochee River originates in Emanuel County and flows southeast to join the Ogeechee River near Richmond Hill. The Ogeechee River Basin contains parts of the Piedmont and Coastal Plain physiographic provinces, which extend throughout the southeastern United States.

The United States Geologic Survey (USGS) has divided the Ogeechee River Basin into four sub-basins, or Hydrologic Units (HUs). These are numbered as HUs 03060201 through 03060204. Figure 1 shows the location of the Ogeechee River Basin in the State of Georgia. Figure 2 shows the locations of the two hydrologic units within the Ogeechee River Basin. Figure 3 through Figure 8 indicate the location of the 303(d) listed stream segments in the Ogeechee River Basin.

The land use characteristics of the Ogeechee River Basin watersheds were determined using data from the Georgia Land Use Trends (GLUT) for Year 2015. This raster land use trend product was developed by the University of Georgia – Natural Resources Spatial Analysis Laboratory

(NARSAL) and follows land use trends for years 1974, 1985, 1991, 1998, 2001, 2005, 2008 and 2015. Some of the NARSAL land use types were reclassified, aggregated into similar land use types, and used in the final watershed characterization. Table 4 lists the watershed land use distribution for the drainage areas of the two stream segments.

1.3 State Water Planning

The Georgia Legislature enacted the Metropolitan North Georgia Water Planning District Act in 2001 to create the [Metropolitan North Georgia Water Planning District](#) (MNGWPD) to preserve and protect water resources in the 15-county metropolitan Atlanta area. The MNGWPD is charged with the development of comprehensive regional and watershed specific water resource management plans to be implemented by local governments in the metropolitan Atlanta area. The MNGWPD issued its first water resource management plan documents in 2003.

In 2004, the Georgia Legislature enacted the Comprehensive State-wide Water Management Planning Act to ensure management of water resources in a sustainable manner to support the state's economy, to protect public health and natural systems, and to enhance the quality of life for all citizens on a state-wide level. GA EPD later developed the 2008 Comprehensive State-wide Water Management Plan, which established Georgia's ten Regional Water Planning Councils (RWPCs) and laid the groundwork for the RWPCs to develop their own Regional Water Plans. The boundaries of these ten RWPCs, in addition to the MNGWPD, are shown in Figure 9. The nine listed water bodies are located within the boundaries of either the [Coastal Georgia Water Planning Region](#) or the [Savannah-Upper Ogeechee Water Planning Region](#).

In 2011, each RWPC developed and adopted Regional Water Plans, which identify ranges of actions or management practices to help meet the State's water quality challenges. Implementation of these plans is critical in meeting Georgia's water resource challenges. The Coastal Georgia RWPC and Savannah-Upper Ogeechee RWPC updated their Regional Water Plans in June 2017, which were adopted by GA EPD in July 2017. The next set of updated Regional Water Plans were adopted by GA EPD in June 2023. These Regional Water Plans are available [here](#).

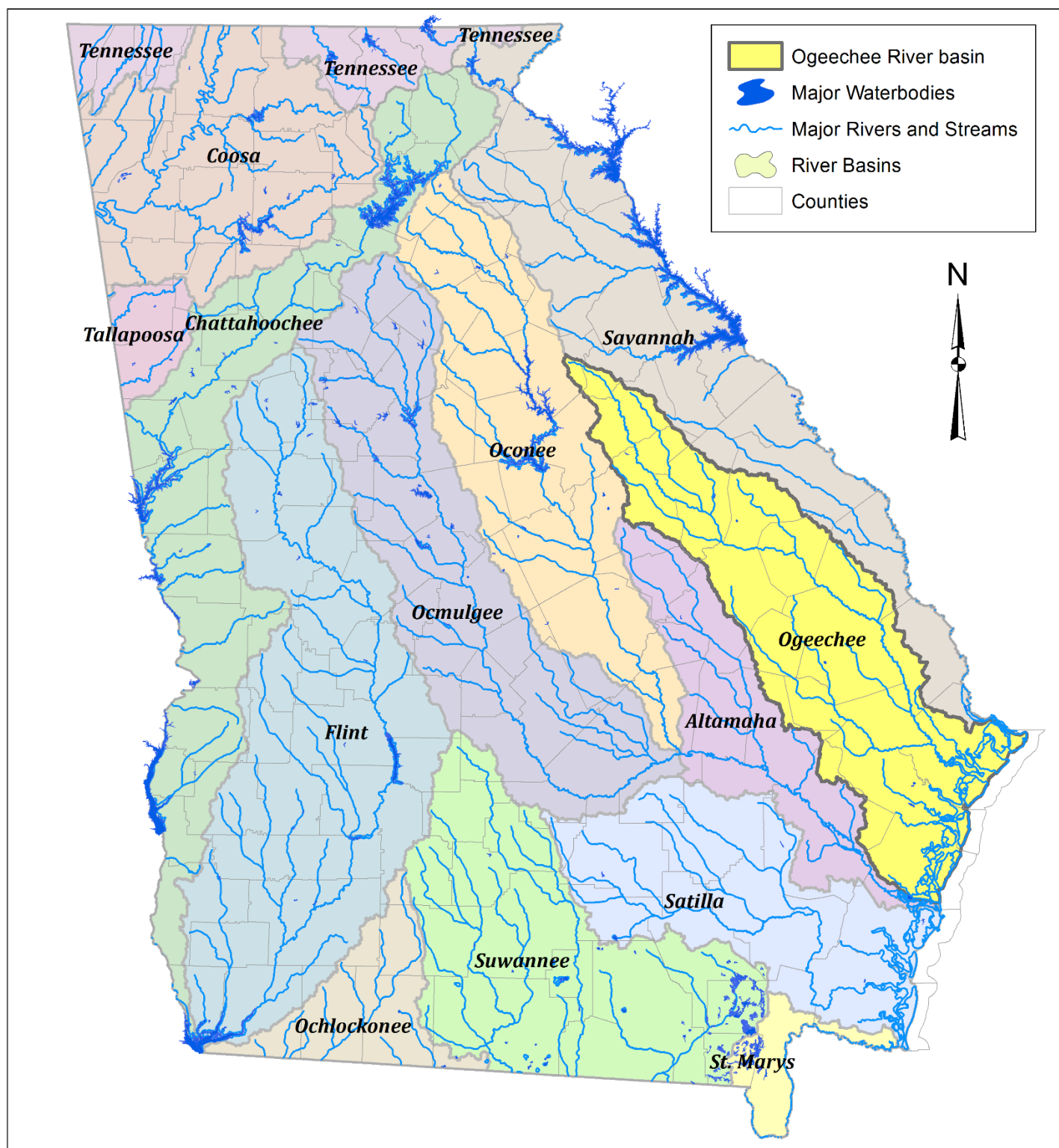


Figure 1: Location of the Ogeechee River Basin in Georgia

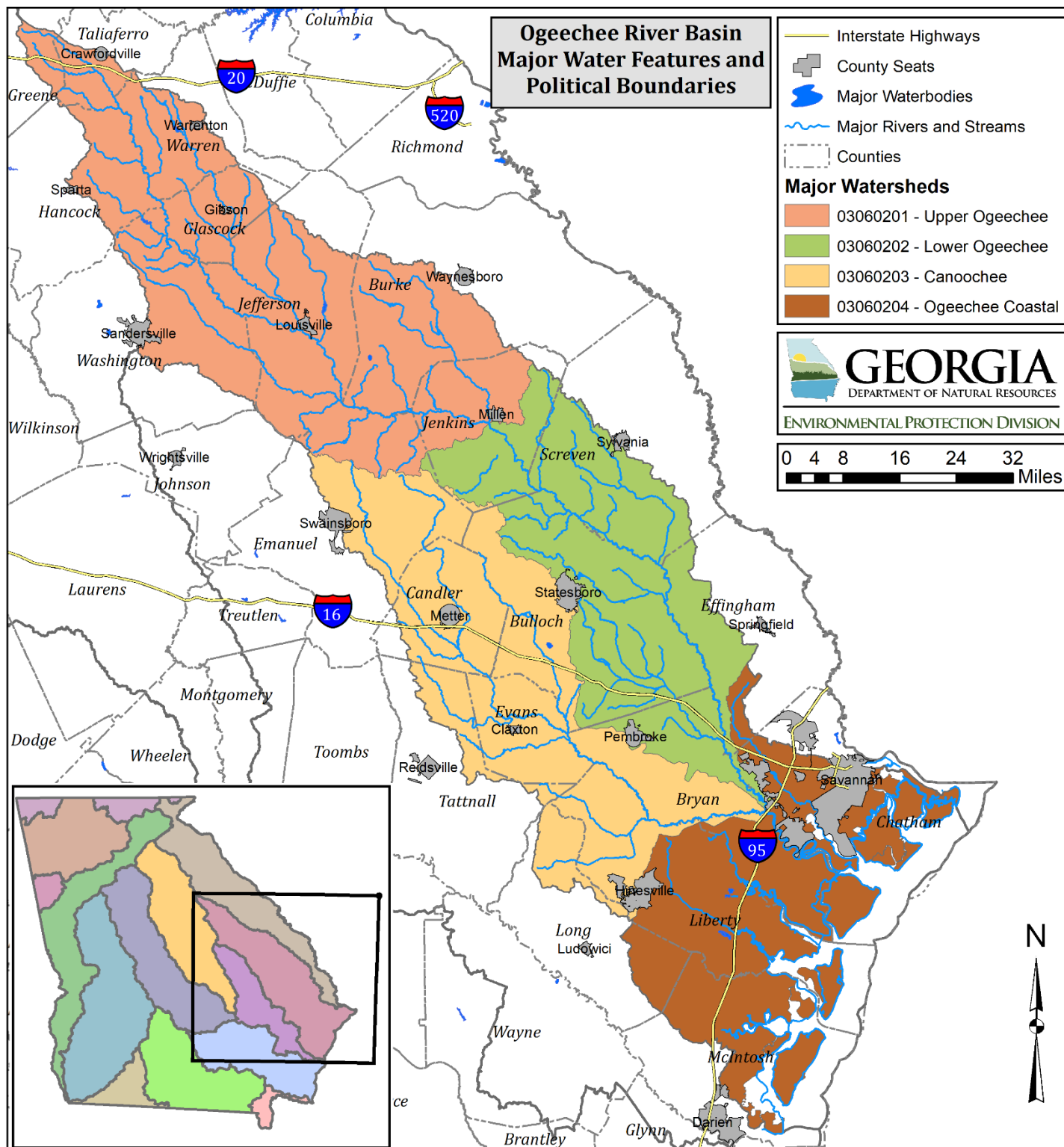


Figure 2: Major Political Boundaries, Water Features, and U.S.G.S. 12-digit HUC

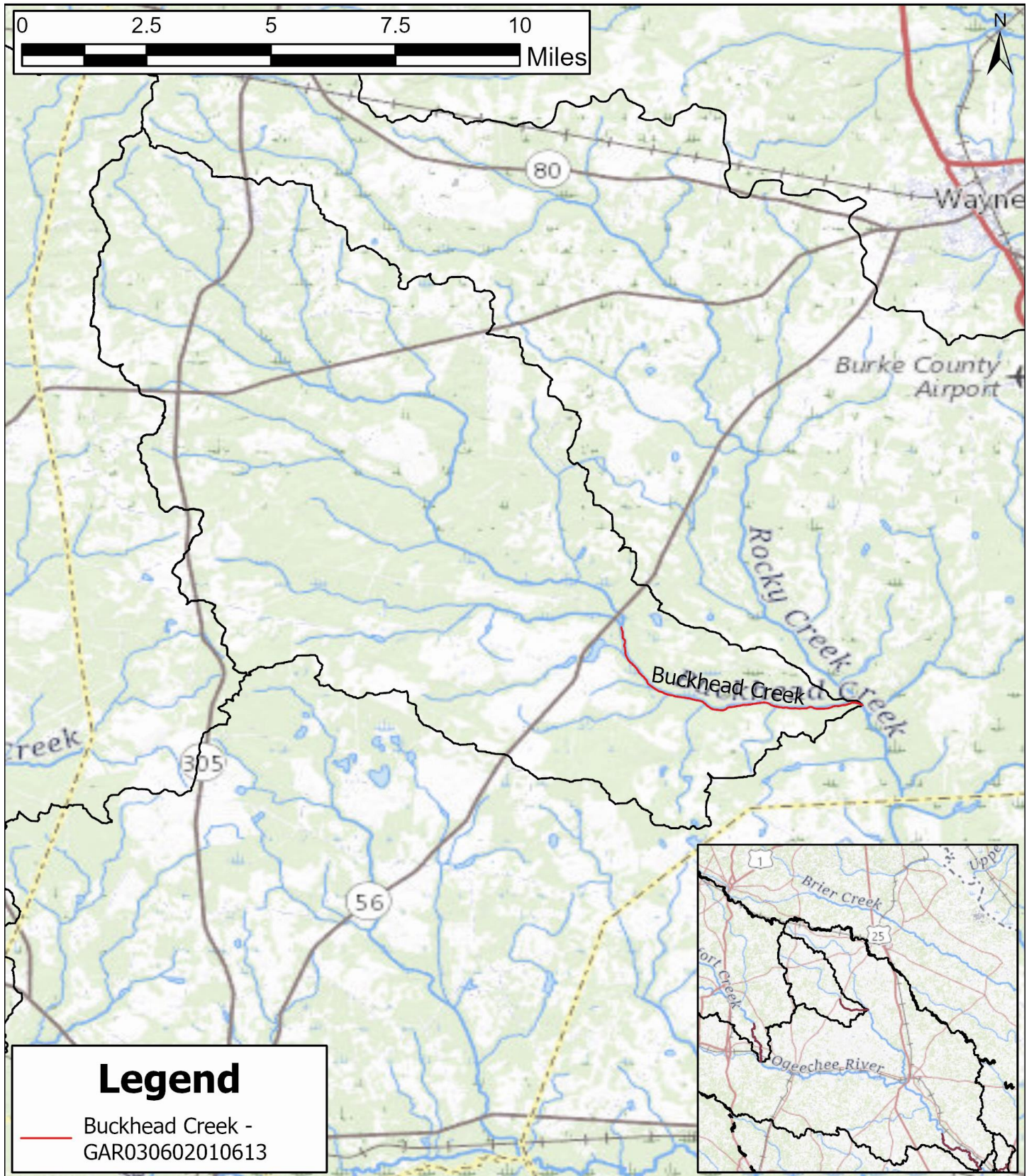
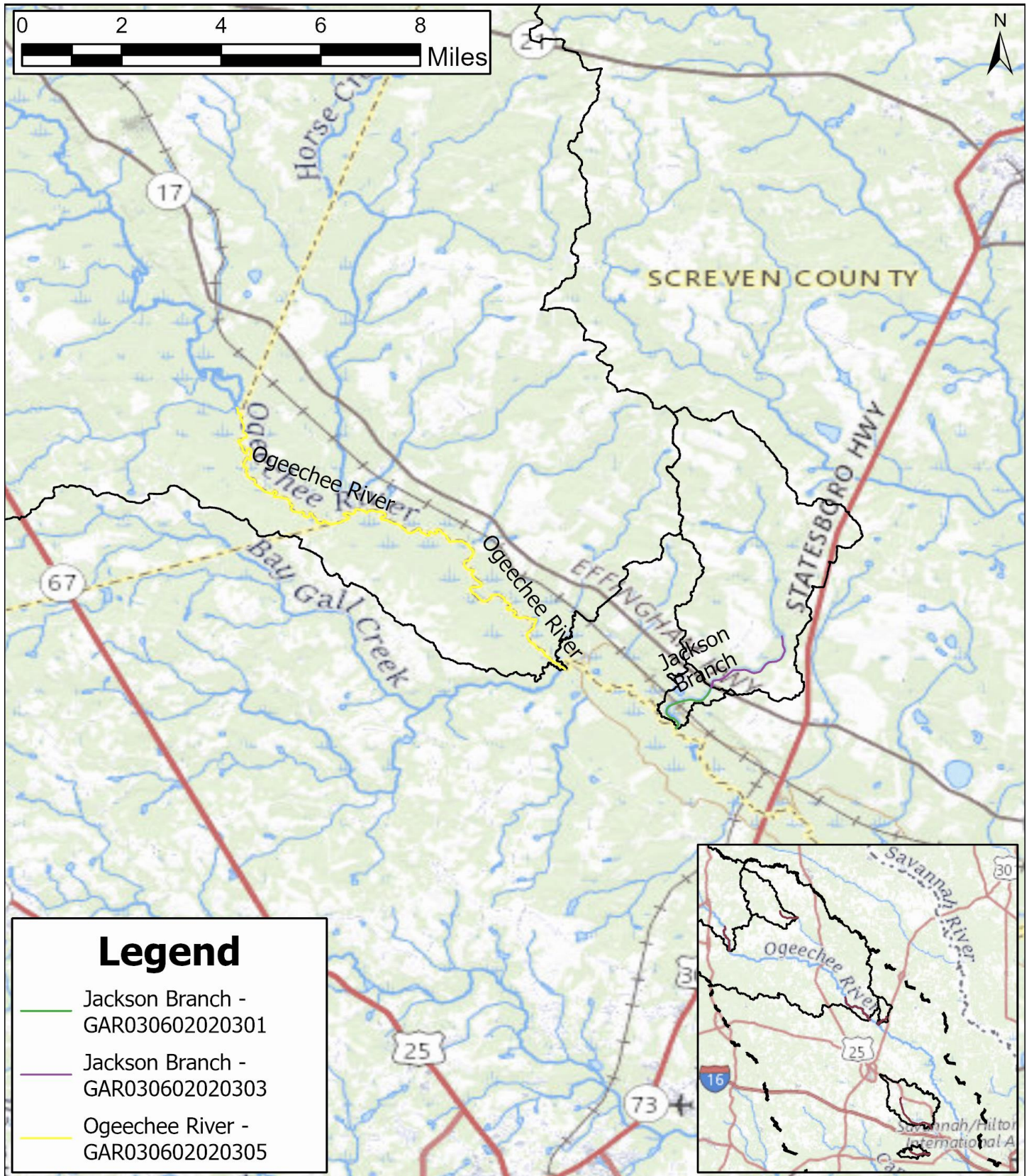


Figure 3: Impaired Stream Segment of Buckhead Creek



Figure 4: Impaired Stream Segment of Bull River



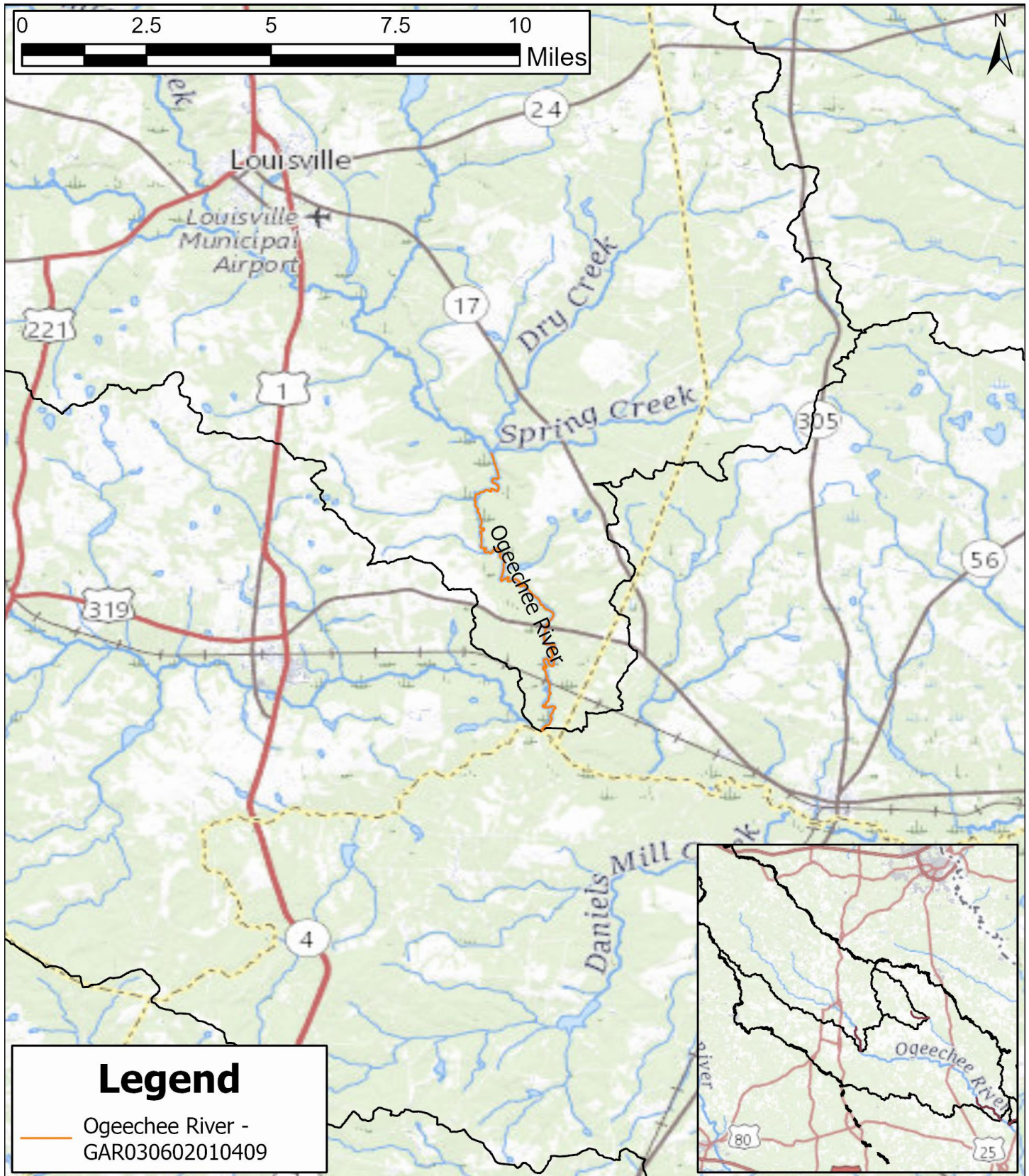


Figure 6: Impaired Stream Segment of Ogeechee River

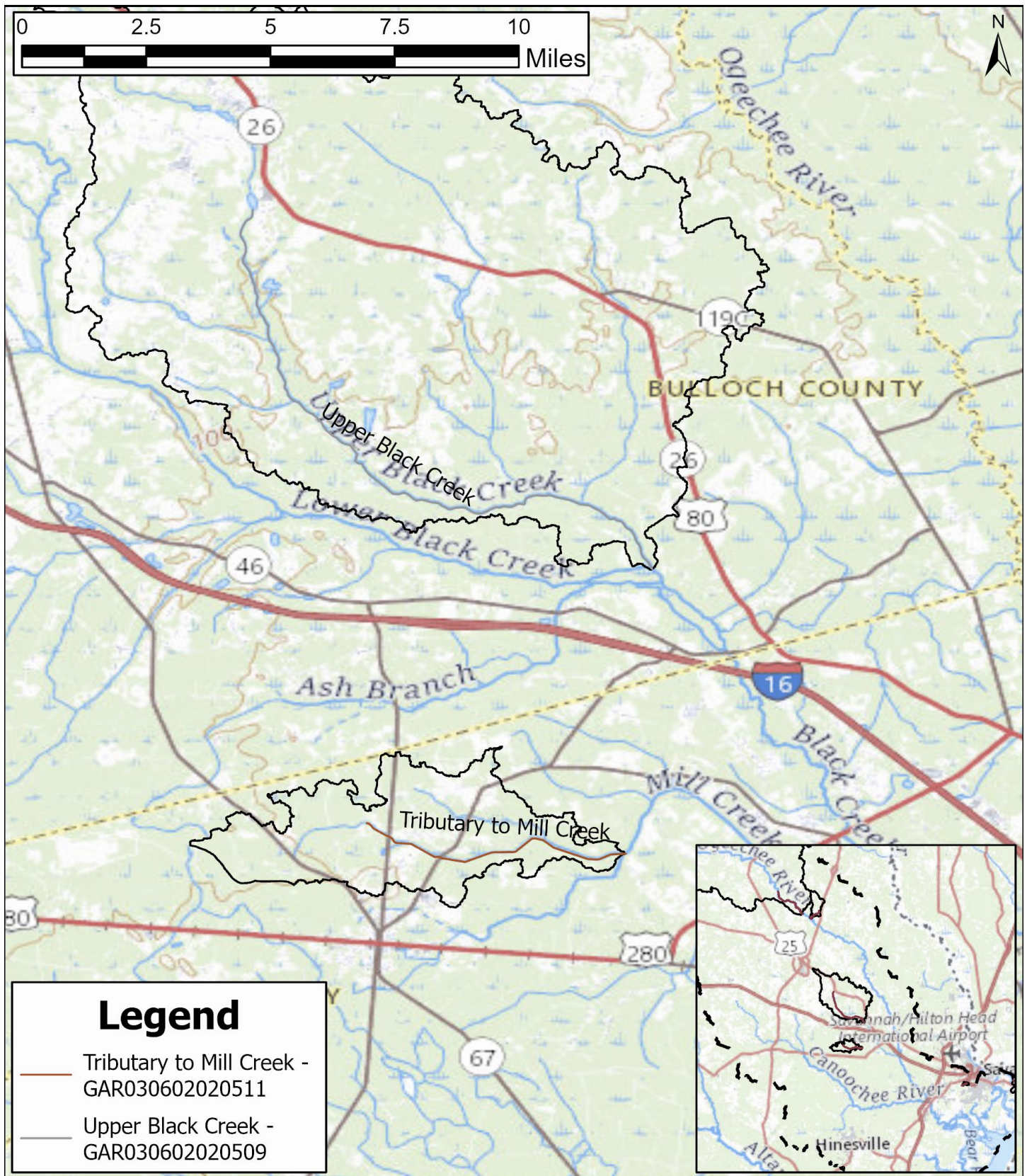


Figure 7: Impaired Stream Segments of Tributary to Mill Creek and Upper Black Creek



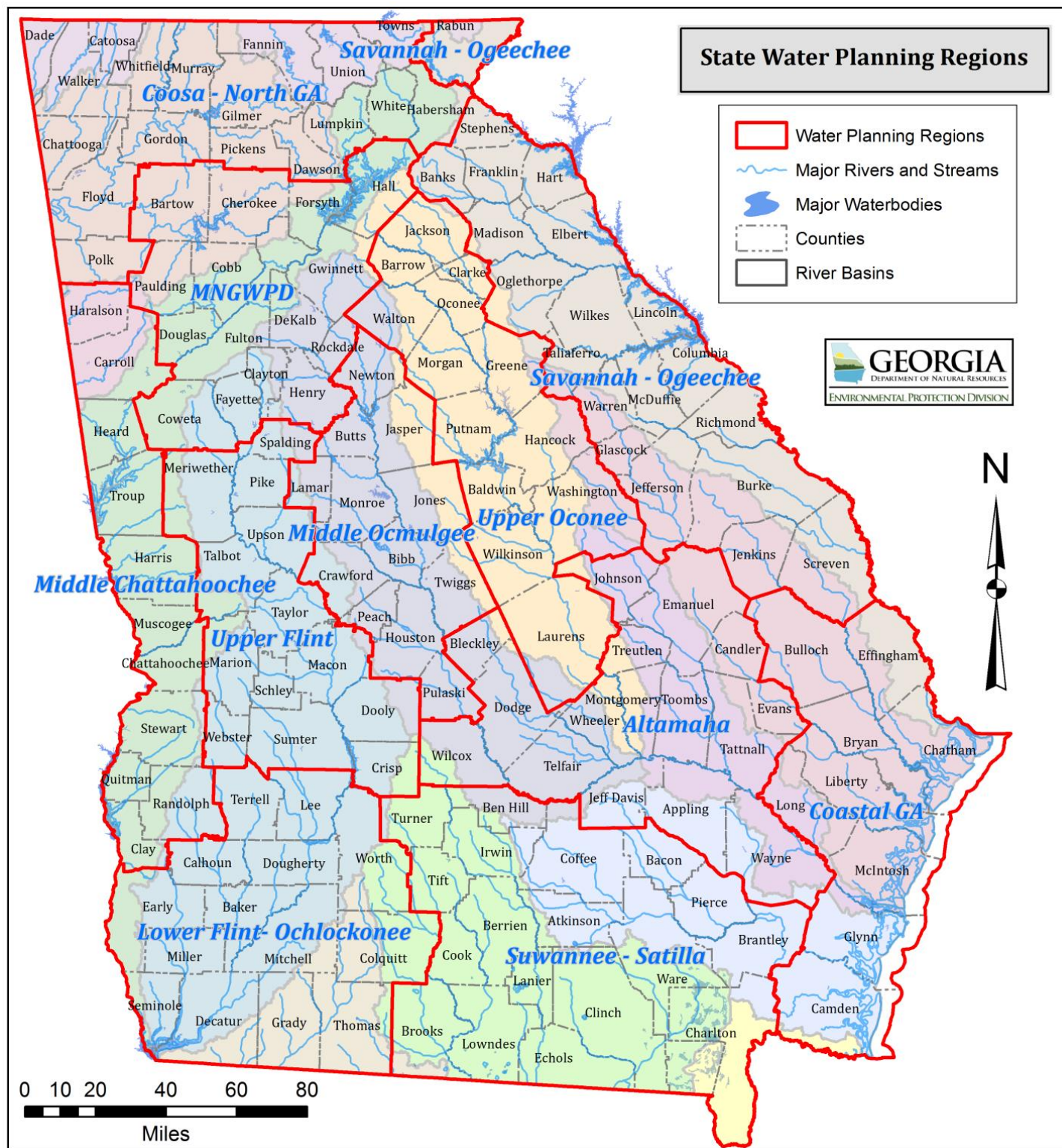
Figure 8: Impaired Stream Segment of Tributary to Salt Creek

1.4 Water Quality Standard

Every waterbody in the State has one or more designated uses, and each designated use has water quality criteria established to protect it. Waterbodies in Georgia are assessed based on the 305(b)/303(d) Listing Assessment Methodology, as such GA EPD placed seven (7) stream segments in the Ogeechee River Basin on the 2022 303(d) list of impaired waters because it was assessed as “not supporting” its designated use of “Fishing” due to violations of the fecal coliform criteria. The potential causes listed include urban runoff and nonpoint sources. The bacteria water quality criteria for the “Fishing” designated use, as approved by US EPA Region 4 on January 20, 2021, and applicable at the time of listing was as follows:

- (c) Fishing: Propagation of Fish, Shellfish, Game and Other Aquatic Life; primary contact recreation in and on the water for the months of May – October, secondary contact recreation in and on the water for the months of November – April; or for any other use requiring water of a lower quality.
 - (i) Bacteria:
 - 1. For the months of May through October, when water contact recreation activities are expected to occur, fecal coliform not to exceed a geometric mean of 200 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. Should water quality and sanitary studies show fecal coliform levels from non-human sources exceed 200 counts per 100 mL (geometric mean occasionally, then the allowable geometric mean fecal coliform shall not exceed 300 counts per 100 mL in lakes and reservoirs and 500 counts per 100 mL in free flowing freshwater streams. For the months of November through April, fecal coliform not to exceed a geometric mean of 1,000 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours and not to exceed a maximum of 4,000 counts per 100 mL for any sample. The State does not encourage swimming in these surface waters since a number of factors which are beyond the control of any State regulatory agency contribute to elevated levels of bacteria.
 - 2. For waters designated as shellfish growing areas by the Georgia DNR Coastal Resources Division, the requirements will be consistent with those established by the State and Federal agencies responsible for the National Shellfish Sanitation Program. The requirements are found in National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish, 2007 Revision (or most recent version), Interstate Shellfish Sanitation Conference, U.S. Food and Drug Administration.

In addition to establishing TMDLs for the seven (7) segments discussed above, this document establishes revised TMDLs for two (2) stream segments in the Ogeechee River Basin as presented in Table 3. These segments have the designated use of “Fishing”.



In January 2022, the Georgia DNR Board adopted new bacteria criteria for “Fishing” and “Drinking Water” designated uses using the bacterial indicators *E. coli* and enterococci. These bacteria are better indicators for human health illnesses. The adopted criteria have the same estimated illness rate (8 per 1000 swimmers) as the previously established fecal coliform criteria. EPA approved the proposed revisions to Georgia’s water quality standards August 31, 2022. The current bacteria water quality criteria for “Fishing” designated uses, as stated in the [State of Georgia’s Rules and Regulations for Water Quality Control](#), Chapter 391-3-6-.03(6)(c)(iii) (GA EPD, 2022), are as follows:

(c) Fishing: Propagation of Fish, Shellfish, Game and Other Aquatic Life; primary contact recreation in and on the water for the months of May – October, secondary contact recreation in and on the water for the months of November – April; or for any other use requiring water of a lower quality.

(i) Bacteria:

1. Estuarine waters: For the months of May through October, when primary water contact recreation activities are expected to occur, culturable enterococci not to exceed a geometric mean of 35 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 130 counts per 100 mL the same 30-day interval.

For the months of November through April, culturable enterococci not to exceed a geometric mean of 74 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 273 counts per 100 mL in the same 30-day interval.

2. All other fishing waters: For the months of May through October, when primary water contact recreation activities are expected to occur, culturable *E. coli* not to exceed a geometric mean of 126 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an *E. coli* statistical threshold value (STV) of 410 counts per 100 mL in the same 30-day interval.

For the months of November through April, culturable *E. coli* not to exceed a geometric mean of 265 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an *E. coli* statistical threshold value (STV) of 861 counts per 100 mL in the same 30-day interval.

3. The State does not encourage swimming in these surface waters since a number of factors which are beyond the control of any State regulatory agency contribute to elevated levels of bacteria.
4. For waters designated as shellfish growing areas by the Georgia DNR Coastal Resources Division, the requirements will be consistent with those established by the State and Federal agencies responsible for the National Shellfish Sanitation Program. The requirements are found in National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish, 2007 Revision (or most recent version), Interstate Shellfish Sanitation Conference, U.S. Food and Drug Administration.

Since this TMDL was written after EPA approved the new bacteria criteria, the TMDL will use both fecal coliform and the appropriate indicator identified above based on estuarine/non-estuarine status. Where fecal coliform and *E. coli* were sampled concurrently, the *E. coli* current load can be determined, and the percentage reduction calculated. For impaired waters where only fecal coliform was sampled, the current *E. coli* or enterococci load cannot be determined. In this case

the TMDL will use a conversion factor to convert from fecal coliform criteria to *E. coli* or enterococci criteria, based on the respective 30-day geometric mean water quality criteria. For non-estuarine waters, a conversion factor of 0.63 will be used to translate the fecal coliform TMDL to *E. coli*. For estuarine waters, a conversion factor of 0.175 will be used to translate the fecal coliform TMDL to enterococci.

Table 4: Ogeechee River Basin Land Coverage

Stream/Segment	Land Use Categories - Acres (Percent)													
	Beaches, Dunes, Mud	Open Water	Developed, Low Intensity	Developed, Medium Intensity	Developed, High Intensity	Transitional, Clearcut, Sparse	Forest	Row Crops	Pasture, Hay	Other Grasses (Developed Open Space, Utility Swaths, Golf Courses)	Forested Wetlands	Non-Forested Wetlands (Salt/Brackish)	Non-Forested Wetlands (Freshwater)	Total
Buckhead Creek GAR030602010613	16.5 0.0%	77.4 0.1%	665.0 1.3%	217.7 0.4%	23.6 0.0%	3440.7 6.6%	16885.8 32.2%	13007.2 24.8%	5847.4 11.2%	2335.6 4.5%	9735.6 18.6%	7.8 0.0%	108.1 0.2%	52368.2 100%
Bull River GAR030602040120	9.8 0.2%	654.5 16.6%	149.4 3.8%	223.5 5.7%	90.7 2.3%	59.2 1.5%	284.9 7.2%	0.7 0.0%	16.5 0.4%	249.5 6.3%	187.5 4.7%	2011.8 51.0%	9.6 0.2%	3947.5 100%
Jackson Branch GAR030602020301	4.2 0.0%	74.3 0.5%	237.5 1.6%	59.8 0.4%	49.1 0.3%	673.4 4.6%	4762.4 32.7%	4297.8 29.5%	1577.4 10.8%	497.7 3.4%	2313.8 15.9%	0.0 0.0%	37.8 0.3%	14585.3 100%
Jackson Branch GAR030602020303	4.2 0.0%	46.0 0.4%	185.0 1.4%	39.8 0.3%	31.8 0.2%	609.4 4.8%	4368.5 34.1%	3739.3 29.2%	1389.3 10.9%	425.7 3.3%	1930.6 15.1%	0.0 0.0%	30.9 0.2%	12800.6 100%
Ogeechee River GAR030602010409	540.2 0.1%	2463.2 0.4%	7498.9 1.2%	2057.6 0.3%	547.8 0.1%	42395.2 6.8%	364176.3 58.0%	60682.5 9.7%	60478.8 9.6%	28025.3 4.5%	58080.5 9.2%	52.5 0.0%	335.1 0.1%	627898.9 100%
Ogeechee River GAR030602020305	891.6 0.1%	4661.2 0.4%	16640.7 1.3%	5233.2 0.4%	1606.4 0.1%	79329.0 6.0%	629857.1 47.7%	206304.5 15.6%	135476.1 10.3%	54024.6 4.1%	184038.8 13.9%	103.0 0.0%	1556.1 0.1%	1320287.3 100%
Tributary to Mill Creek GAR030602020511	0.2 0.0%	10.2 0.1%	113.4 1.6%	14.2 0.2%	6.9 0.1%	297.1 4.1%	2720.6 37.4%	430.3 5.9%	924.7 12.7%	414.3 5.7%	2324.3 32.0%	0.2 0.0%	8.9 0.1%	7265.4 100%
Tributary to Salt Creek GAR030602040213	0.0 0.0%	5.3 1.1%	97.0 19.5%	83.4 16.8%	13.1 2.6%	7.8 1.6%	43.4 8.7%	0.0 0.0%	30.2 6.1%	88.1 17.7%	129.0 25.9%	0.0 0.0%	0.0 0.0%	497.3 100%
Upper Black Creek GAR030602020509	1.8 0.0%	191.9 0.3%	881.4 1.6%	341.6 0.6%	178.8 0.3%	1084.2 1.9%	12747.0 22.7%	13283.7 23.6%	4282.9 7.6%	1868.3 3.3%	21138.6 37.6%	0.0 0.0%	240.9 0.4%	56241.0 100%

Total Maximum Daily Load Evaluation
August2023
Ogeechee River Basin (Bacteria)

2.0 WATER QUALITY ASSESSMENT

Stream segments are placed on the 303(d) list as not supporting their water use classification based on water quality sampling data. Currently, a stream is placed on this list if more than ten percent of the calculated geometric means exceed their water quality criteria or if more than ten percent of the samples exceed the single sample criteria. Water quality samples collected within a 30-day period that have a fecal coliform geometric mean in excess of 200 counts per 100 milliliters (mL) during the period May through October, or in excess of 1000 counts per 100 mL during the period November through April, are in violation of the bacteria water quality criteria. There is also a single sample criterion (4000 counts per 100 mL) not to be exceeded at any given time.

Fecal coliform data used for development of the TMDL in this document were collected during calendar years 2017 through 2021 by GA EPD as part of the trend monitoring program. A summary of sampling station locations and sampling dates is given in Table 5. The raw data are presented in Appendix A. All the streams in which the TMDLs are being revised are currently meeting their water quality standards, and thus the streams are not included in the table below. These streams may have been listed on spill data, and that is no longer available. An alternative method for calculating the TMDL bacterial loading was developed and will be described in later sections with supporting information in Appendix A.

Table 5: Sampling Stations and Dates – Ogeechee River Basin

Stream Segment	Location	GA EPD Monitoring Station No.	GPS Coordinates	Monitoring Station Description	Sample Date Range
Buckhead Creek GAR030602010613	Eightmile Creek to Rocky Creek	RV_02_17682	32.94622, -82.06999	Buckhead Creek at Herndon Rd near Perkins, GA	2020
Bull River GAR030602040120	Richardson Creek to Lazaretto River	SH_02_323	32.02829, -80.94725	Bull River between Hwy 26 / Hwy 80 and Belz Creek	2019-21
Ogeechee River GAR030602010409	Spring Creek to Williamson Swamp Creek	RV_02_286	32.869722, -82.319722	Ogeechee River - Georgia Highway 78 Near Wadley	2019
Ogeechee River GAR030602020305	Long Branch to Nevills Creek	RV_02_293	32.664942, -81.8409	Ogeechee River at Rocky Ford Road nr Rocky Ford, GA	2017
Tributary to Mill Creek GAR030602020511	Unnamed tributary 0.3 miles upstream Sims Road to Mill Creek	RV_02_485	32.16063, -81.56036	Trib to Mill Creek at C C Road near Ellabell, GA	2020
Tributary to Salt Creek GAR030602040213	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway	RV_02_17761	32.035416, -81.156263	Unnamed Canal at Louis Mills Blvd near Savannah, GA	2021
Upper Black Creek GAR030602020509	Crombly Pond to Lower Black Creek	RV_02_304	32.27574, -81.62826	Upper Black Creek at CR 582 (Arcola Rd.)	2020

3.0 SOURCE ASSESSMENT

An important part of the TMDL development process is the identification of potential sources of pollutants causing the waterbody to be listed on the 303(d) list. A source assessment identifies the known and suspected sources and discharges of bacteria in the watershed. Sources are broadly classified as either point or nonpoint sources. The CWA defines a point source as any “discernable, confined, and discrete conveyance including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged. This term does not include agricultural stormwater discharges and return flows from irrigated agriculture.” Nonpoint sources are diffuse, and generally, but not always, involve accumulation of bacteria on land surfaces that wash off due to storm events.

3.1 Point Source Assessment

Title IV of the CWA establishes the National Pollutant Discharge Elimination System (NPDES) permit program. Basically, there are two categories of NPDES permits: 1) wastewater treatment facilities, and 2) regulated stormwater discharges.

3.1.1 Wastewater Treatment Facilities

In general, NPDES point source discharge permits are issued to Publicly Owned Treatment Works (POTWs) and Non-Publicly Owned Treatment Works (Non-POTWs) authorizing the discharge of treated wastewater to surface waters. POTWs are commonly associated with city and county owned wastewater treatment facilities; whereas Non-POTWs are associated with industrial, private, and federal facilities. The permits include permit conditions, requirements, and numeric effluent limits developed using federal and state effluent guidelines (secondary treatment standards for POTWs and technology-based limits (TBELs) for Non-POTWs) or on water quality standards (water quality-based effluent limits, WQBELs).

The United States Environmental Protection Agency (USEPA) has developed technology-based standards and guidelines, which establish a minimum standard of pollution control for POTW and Non-POTW discharges without regard for the quality of the receiving waters. For POTWs, EPA has established Secondary Treatment Standards. For Non-POTW, the TBELs are based on Best Practical Control Technology Currently Available (BPT), Best Conventional Control Technology (BCT), Best Available Technology Economically Achievable (BAT), and New Source Performance Standards. The level of control required by each facility is dependent on the source of wastewater generated and the pollutants found in the discharge.

The USEPA and the States have also developed numeric and narrative water quality criteria to protect a stream’s designated uses. Typically, these criteria are based on the results of aquatic toxicity tests and/or human health criteria and include a margin of safety. Wastewater NPDES permits also include WQBELs to protect these narrative and numeric water quality criteria and their designated uses. WQBELs ensure water quality standards are met in the receiving water and downstream uses are protected.

For purposes of this TMDL, permitted wastewater treatment facilities are considered point sources, and include POTWs and Non-POTWs. Pollutants discharged from wastewater treatment plants can contribute bacteria to receiving waters. As of 2022, there are four (4) NPDES permitted

discharges identified in the watershed of the listed segments in the Ogeechee River Basin that could potentially impact streams on the 2022 303(d) list for fecal coliform bacteria. Typically, the contributing watershed for a 303(d) listed segment is defined as the area upstream of the segment.

Table 6 provides the monthly average discharge flow and fecal coliform concentrations for these facilities that currently have bacteria permit limits. These data were obtained from calendar years 2015 through 2020 Discharge Monitoring Reports (DMR). The current permitted flow and fecal coliform concentrations are also included in this table. Table 7 also provides a list of existing Non-POTW discharges without bacteria permit limits. It is possible these facilities could contribute bacteria to receiving water because the type of treatment processes they employ.

Another potential point source contribution may be a combined sewer system (CSS) that conveys a mixture of raw sewage and stormwater in the same conveyance structure to the wastewater treatment plant and may also have direct discharges (as authorized under a NPDES permit) to waters of the state. These are generally a component of POTWs. When the combined sewage exceeds the capacity of the wastewater treatment plant, the excess is diverted to a combined sewage overflow (CSO) discharge point. There are no permitted CSO outfalls in the Ogeechee River Basin.

3.1.2 Regulated Stormwater Discharges

Discharges of stormwater authorized under a NPDES permit are considered a point source. Unlike other wastewater NPDES permits that establish end-of-pipe effluent limits, stormwater NPDES permits establish best management practices (BMPs) and controls that are intended to reduce the quantity of pollutants that stormwater picks up and carries into storm sewer systems during rainfall events “to the maximum extent practicable.” Currently, regulated stormwater discharges that may contain bacteria, consist of those associated with industrial activities and large, medium, and small municipal separate storm sewer systems (MS4s) that serve populations of 10,000 or more.

3.1.2.1 Industrial General Stormwater NPDES Permit

Storm water discharges associated with industrial activities are currently covered under the 2022 NPDES General Permit for Stormwater Discharges Associated with Industrial Activity (GAR050000) also called the Industrial General Permit (IGP). This permit requires visual monitoring of stormwater discharges, site inspections, implementation of BMPs, preparation of a Storm Water Pollution Prevention Plan (SWPPP), and annual reporting. The IGP requires that stormwater discharging into an impaired stream segment or within one linear mile upstream of, and within the same watershed as, any portion of an impaired stream segment identified as “not supporting” its designated use(s), must satisfy the requirements of Appendix C of the 2022 IGP, if the pollutant(s) of concern for which the impaired stream segment has been listed may be exposed to stormwater as a result of industrial activity at the site. If a facility is covered under Appendix C of the IGP, then benchmark monitoring for the pollutant(s) of concern is required. Delineations of both supporting and not supporting waterbodies are provided on the GA EPD [website](#), and are available in ESRI ArcGIS shapefile format or in KMZ format for use in Google Earth. Interested parties may evaluate their proximity to not supporting waterbodies by utilizing these geospatial files.

Table 6: NPDES Facilities Discharging Fecal Coliform in the Ogeechee River Basin

Facility Name	NPDES Permit No.	Receiving Stream	303(d) Listed Segment(s)	Actual Discharge (2015–2020)		NPDES Permit Limits		Number of Spills ^c
				Avg. Monthly Flow (MGD) ^a	Avg. Monthly fecal coliform (#/100mL) ^b	Avg. Monthly Flow (MGD)	Avg. Monthly fecal coliform (#/100mL)	
Forstmann WPCP (City of Louisville)	GA0050243	Ogeechee River	Ogeechee River GAR030602010409	0.840 (0.0-1.85)	21.1 (0.0-775.1)	2.0	200	13
Gibson WPCP	GA0021849	Rocky Comfort Creek	Ogeechee River GAR030602010409	0.0417 (0.0-0.23)	9.2 (0.0-265.0)	0.9	200	3
Millen WPCP	GA0038750	Unnamed Tributary to the Ogeechee River	Ogeechee River GAR030602020305	0.332 (0.0-1.26)	4.3 (0.0-67.0)	0.95	200	0
Pembroke WPCP	GA0038377	Tributary to Mill Creek	Tributary to Mill Creek GAR030602020511	0.268 (0.0-0.498)	19.7 (0.0-217.2)	0.35	200	5

Source: GA EPD – Discharge Monitoring Report (DMR data from ICIS-NPDES)

Notes: ^a - Values shown are the average of the monthly average flows reported in DMRs, followed by the monthly average ranges during the period.

^b - Values shown are the annual average of the monthly geometric means and the monthly average ranges.

^c - From GAPDES self-reported spill monitoring system.

Table 7: NPDES Non-POTW Facilities without Bacteria Permit Limits that Discharge to 303(d) Listed Stream Segments in the Ogeechee River Basin

Facility Name	NPDES Permit No.	Receiving Stream	303(d) Listed Segment(s)
King America Finishing, Inc.	GAG278093	Jackson Branch	Jackson Branch GAR030602020301
McIntyre Pits	GA0046621	Blue Spring Creek	Ogeechee River GAR030602010409
Sandersville Mine Pits	GA0038717	Tributary to Rocky Comfort Creek	Ogeechee River GAR030602010409
Warrenton Quarry	GA0034576	Unnamed Tributary to Taylors Creek	Ogeechee River GAR030602010409
Warrenton WTP	GAG640056	Rocky Comfort Creek	Ogeechee River GAR030602010409

3.1.2.2 MS4 NPDES Permits

The collection, conveyance, and discharge of diffuse stormwater to local waterbodies by a public entity are regulated in Georgia by the NPDES MS4 permits. These MS4 permits have been issued under two phases. Phase I MS4 permits cover medium and large cities, and counties with populations over 100,000. Each individual Phase I MS4 permit requires the prohibition of non-stormwater discharges (i.e., illicit discharges) into the storm sewer systems and controls to reduce the discharge of pollutants to the maximum extent practicable, including the use of management practices, control techniques and systems, as well as design and engineering methods (Federal Register), 1990. A site-specific Storm Water Management Plan (SWMP) outlining appropriate controls is required by and referenced in the permit. A program to monitor and control pollutants in stormwater discharges from industrial facilities, construction sites, and highly visible pollutant sources that exist within the MS4 area must be implemented under the permit. Additionally, monitoring of non-supporting streams, public education and involvement, post-construction stormwater controls, low impact development, and annual reporting requirements must all be addressed by the permittee on an ongoing basis. As of 2022, fifty-seven (57) counties and municipalities are covered by Phase I MS4 permits in Georgia.

Small MS4s serving urbanized areas are required to obtain a stormwater permit under the Phase II stormwater regulations. An urbanized area is defined as an area with a residential population of at least 10,000 people and an overall population density of at least 1,000 people per square mile. As of 2022, Seventy-three (73) municipalities, thirty-five (35) counties, five (5) Department of Defense facilities, and the Georgia Department of Transportation (GDOT) are permitted under the Phase II stormwater regulations in Georgia. All municipal Phase II permittees are authorized to discharge under Storm Water General Permit GAG610000. Department of Defense facilities are authorized to discharge under Storm Water General Permit GAG480000. GDOT owned or operated facilities are authorized to discharge under Storm Water General Permit GAR041000.

Under these general permits, each permittee must design and implement a SWMP that incorporates BMPs that focus on public education and involvement, illicit discharge detection and

elimination, construction site runoff control, post-construction stormwater management, and pollution prevention in municipal operations. Table 8 provides the Phase I and Phase II counties, communities, and other entities covered by MS4s Permits in the Ogeechee River Basin. There are three (3) permitted MS4s that discharge into or upstream of a stream segment not supporting its designated use for bacteria.

Table 8: Permitted MS4s in the Ogeechee River Basin

Permit No.	MS4 Permittee	MS4 Phase	Impaired Stream Watershed
GAS000206	Chatham County	Phase 1 Medium	Bull River GAR030602040120 Tributary to Salt Creek GAR030602040213
GAS000205	City of Savannah	Phase 1 Medium	Tributary to Salt Creek GAR030602040213
GAG410000	Georgia Department of Transportation	Phase 2	All segments related to other Phase 2 permittees in this table

Source: Nonpoint Source Program, GA DNR, 2022

For those listed segments whose contributing watersheds intersect with the jurisdiction of MS4 permit holders in the Ogeechee River Basin, Table 9 provides the listed segment, total contributing watershed area and percentage of the watershed area that consists of urban land use types. Urbanized areas include land uses identified as residential, commercial, industrial, and transportation, as well as lawns, parks, and greenspace. These areas are quantified using the land use categories of low, medium, and high intensity developed, and other grasses as presented in Table 4.

Table 9: Urban Land Use Percentage for Listed Segments with MS4 Permit Contributions

Stream Segment	Location	Reach AUID	Total Watershed Area (acres)	Urban Land Use Percentage
Tributary to Salt Creek	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway	GAR030602040213	497.3	54%

3.1.3 Concentrated Animal Feeding Operations

Animal feeding operations (AFOs) are agricultural operations where animals are kept and raised in confined situations. AFOs that meet the regulatory definition of a concentrated animal feeding operation (CAFO) are regulated under the NPDES permitting program. The NPDES program regulates the discharge of pollutants from point sources to waters of the state. From 1999 through 2001, Georgia adopted rules for permitting swine and non-swine liquid manure animal feeding operations (AFOs). Georgia rules required medium size AFOs with more than 300 animal units (AU), but less than 1,000 AU, to apply for a non-discharge state land application system (LAS) waste disposal permit. Large operations with more than 1000 AU were required to apply for an NPDES permit (also non-discharge) as a CAFO. The USEPA CAFO regulations were successfully appealed in 2005. They were revised to comply with the court's decision that NPDES permits only

be required for actual discharges. Georgia's rules were amended on August 7, 2012, to reflect the USEPA revisions. The revised state rules authorize LAS permitting of medium and large size liquid manure AFOs unless they elect to obtain an NPDES permit. There are no known liquid manure CAFO located in the watersheds of the listed segments in the Ogeechee River Basin that have NPDES or land application permits. There is one known liquid manure CAFO located in the watersheds of the listed segments that was previously permitted under Georgia rules that no longer meets the size that is required for permit coverage.

In 2002, the USEPA promulgated expanded NPDES permit regulations for CAFOs that added dry manure poultry operations larger than 125,000 broilers or 82,000 layers. In accordance with the Georgia rule amendment discussed above, the general permit covering these facilities has been terminated and they are no longer covered under any permit. Georgia is consistently among the top three states in the U.S. in terms of poultry operations. Most poultry farms are dry manure operations where the manure is stored for a time and then land applied. Freshly stored litter can be a nonpoint source of bacteria. However, land-applied litter previously stored for an extended length of time typically exhibits very low bacteria levels. Table 9 presents the current swine and non-swine (primarily dairies) CAFOs located in the Ogeechee River Basin and indicates those that may impact the listed streams.

Table 10: Permitted CAFOs in the Ogeechee River Basin

Name	Permit No.	County	Animal Type	Total No. of Animals Units	Impaired Stream Watershed
Birdsville Dairy	GAG940034	Jenkins	Dairy	>1000	Ogeechee River GAR030602020305
Arrowhead Dairy LLC (formerly known as Eberly Family Farm)	GAG930065	Burke	Dairy	NPDES >1000	Buckhead Creek GAR030602010613 Ogeechee River GAR030602020305
Greenstone Grazing #1	GAG920042	Jefferson	Dairy	300 to 1000	Ogeechee River GAR030602010409
Greenstone Grazing #2	GAG920052	Jefferson	Dairy	300 to 1000	Ogeechee River GAR030602010409
Harmony Grove Dairy	GAG930067	Burke	Dairy	NPDES >1000	Ogeechee River GAR030602020305
Pineland Dairy	GAG920054	Burke	Dairy	300 to 1000	Buckhead Creek GAR030602010613 Ogeechee River GAR030602020305
Visscher Dairy LLC	GAG920097	Jefferson	Dairy	300 to 1000	Ogeechee River GAR030602010409

Source: Georgia Pollutant Discharge Elimination System, GA EPD, 2022

3.2 Nonpoint Source Assessment

In general, nonpoint sources cannot be identified as entering a waterbody through a discrete conveyance at a single location. Typical nonpoint sources of bacteria include:

- Wildlife
- Agricultural Livestock
 - Animal grazing
 - Animal access to streams

- Application of manure to pastureland and cropland
- Urban Development
 - Leaking sanitary sewer lines
 - Leaking septic systems
 - Land Application Systems
 - Landfills

In urban areas, a large portion of stormwater runoff may be collected in storm sewer systems and discharged through distinct outlet structures. For large urban areas, these storm sewer discharge points may be regulated as described in Section 3.1.2.

3.2.1 Wildlife

The significance of wildlife as a source of bacteria in streams varies considerably depending on the animal species present in the watershed. Based on information provided by the Wildlife Resources Division (WRD) of GA DNR, the greatest wildlife sources of bacteria are the animals that spend a large portion of their time in or around aquatic habitats. Of these, waterfowl, especially ducks and geese, are considered to be the most significant source, because when present, they are typically found in large numbers on the water surface. Other animals regularly found around aquatic environments include racoons, beavers, muskrats, and to a lesser extent, river otters and minks. Recently, rapidly expanding feral swine populations have become a substantial presence in the floodplain areas of the major rivers in Georgia.

White-tailed deer populations are also abundant throughout the Ogeechee River Basin. Bacteria contributions to waterbodies from deer are generally considered to be less significant than that of waterfowl, racoons, and beavers. This is because a greater portion of their time is spent in terrestrial habitats. This also holds true for other terrestrial mammals such as squirrels and rabbits, and for terrestrial birds (GA WRD, 2007). However, feces deposited on the land surface can result in the introduction of bacteria to streams during runoff events. Between storm events, considerable decomposition of the fecal matter might occur, resulting in a decrease in the associated bacteria numbers.

3.2.2 Agricultural Livestock

Agricultural livestock are a potential source of bacteria to streams in the Ogeechee River Basin. The animals grazing on pastureland deposit their feces onto land surfaces, where it can then be transported during storm events to nearby streams. Animal access to pastureland varies monthly, resulting in varying bacteria loading rates throughout the year. Beef cattle spend all their time in pastures, while dairy cattle and hogs are periodically confined. In addition, agricultural livestock will often have direct access to streams that pass through their pastures and can thus impact water quality in a more direct manner (USDA, 2002).

Commercial chickens are raised indoors, and their litter is periodically disposed of. The litter can be aged or composted. This results in a decomposition of the litter into a soil amendment that can be used as a fertilizer. The stockpiled manure should be kept in a sheltered area. Proper composting should generate temperatures of 140°F to 160°F, which destroys bacteria. Aging the manure and litter reduces populations of microbes by providing unfavorable growing conditions causing the bacteria to gradually die off due to changes in moisture content and temperature. Table 11 provides the estimated number of beef cattle, dairy cattle, goats, horses, swine, sheep, and chickens reported by county.

Table 11: Estimated Agricultural Livestock Populations in Counties Containing the 303(d) Listed Segment Watershed in the Ogeechee River Basin

County	Livestock								
	Beef Cattle	Dairy Cattle	Swine	Sheep	Horses	Goats	Chickens		
							Broilers	Layers	Pullets
Bryan	156	-	-	-	550	150	-	-	-
Bulloch	1,452	-	176	400	2,200	2,702	6,233,322	14,554	-
Burke	10,592	13,000	60	300	550	600	-	-	-
Candler	4,411	-	2,510	200	-	500	-	19,846	-
Chatham	214	-	-	-	-	-	-	-	-
Effingham	4,190	-	150	80	625	1,001	-	-	-
Emanuel	9,603	-	151	350	150	1,251	583,043	-	-
Evans	5,597	-	-	75	-	400	8,967,292	6,615	-
Glascock	5,931	-	80	350	390	1,500	-	-	-
Greene	9,429	500	-	300	325	400	8,629,913	75,415	-
Hancock	2,615	165	-	40	220	550	-	-	-
Jefferson	9,437	2,100	45	120	20	600	-	-	-
Jenkins	4,130	110	300	125	55	850	-	-	-
Liberty	1,062	-	-	-	-	-	-	-	-
Long	2,092	-	-	-	-	600	2,796,751	13,231	77,656
McIntosh	491	-	50	40	45	150	-	-	-
Screven	10,369	-	-	100	200	1,001	-	-	-
Taliaferro	-	-	-	-	-	-	6,266,077	50,277	-
Tattnall	11,552	-	-	600	-	1,501	68,330,700	244,767	43,956
Warren	6,931	-	438	320	780	1,500	-	-	-
Washington	7,800	700	100	600	55	1,600	-	-	-

Source: Center for Agribusiness and Economic Development, UGA 2022

3.2.3 Urban Development

Bacteria from urban areas are attributable to multiple sources, including: domestic animals, leaks and overflows from sanitary sewer systems, illicit discharges, leaking septic systems, runoff from improper disposal of waste materials, and leachate from both operational and closed landfills.

Urban runoff can contain high concentrations of bacteria from domestic animals and urban wildlife. Bacteria enter streams by direct wash off from the land surface, or the runoff may be diverted to a stormwater collection system and discharged through a discrete outlet structure. For large, medium, and small urban areas (populations greater than 10,000), the stormwater outlets are regulated under MS4 permits (see Section 3.1.2). For smaller urban areas, the stormwater discharge outlets currently remain unregulated.

In addition to urban animal sources of bacteria, there may be illicit connections to the storm sewer system. As part of the MS4 permitting program, municipalities are required to conduct dry-weather monitoring to identify and then eliminate these illicit discharges, but this may not occur in

unpermitted storm sewer systems. Bacteria may also enter streams from leaky sewer pipes, or during storm events when inflow and infiltration can cause sewer overflows.

3.2.3.1 Leaking Septic Systems

A portion of the bacteria contributions in the Ogeechee River Basin may be attributed to failure of septic systems and illicit discharges of raw sewage. Table 12 below presents the number of septic systems existing at the end of 2015 and the number existing at the end of 2020 in counties in the Ogeechee River Basin. These data are based on data provided by the Georgia Department of Public Health and information obtained from the U.S. Census. In addition, an estimate of the number of septic systems installed and repaired during the period from 2015 through 2020 is given. These data show an increase in the number of septic systems in all counties. Often, this reflects population increases outpacing the expansion of sewage collection systems.

Table 12: Estimated Number of Septic Systems in Counties within the Ogeechee River Basin

County	Existing Septic Systems (2015)	Existing Septic Systems (2020)	Number of Septic Systems Installed (2015 to 2020)	Number of Septic Systems Repaired (2015 to 2020)
Bryan	10,002	10,484	482	253
Bulloch	21,005	22,700	1,695	464
Burke	8,347	8,924	577	203
Candler	3,590	3,807	217	60
Chatham	14,945	15,242	297	392
Effingham	17,830	18,895	1,065	378
Emanuel	7,685	8,031	346	157
Evans	3,416	3,561	145	50
Glascok	1,427	1,483	56	13
Greene	5,401	5,786	385	32
Hancock	4,799	4,955	156	33
Jefferson	5,271	5,446	175	105
Jenkins	2,751	2,773	22	0
Liberty	8,899	9,172	273	102
Long	5,623	6,291	668	76
McIntosh	6,743	7,072	329	216
Screven	6,095	6,298	203	28
Taliaferro	898	920	22	3
Tattnall	7,141	7,530	389	117
Warren	2,043	2,095	52	27
Washington	6,458	6,649	191	199

Source: The Georgia Dept. of Public Health, Environmental Health Section, 2022

3.2.3.2 Land Application Systems

Some communities and industries use land treatment systems for wastewater disposal. These facilities are required through land application system (LAS) permits to dispose of their treated

wastewater by land application, and to operate as non-discharging systems that do not contribute wastewater effluent runoff to surface waters. However, sometimes the soil's percolation rate is exceeded when applying the wastewater, or encountering excess precipitation, resulting in runoff. This runoff could contribute bacteria to nearby surface waters. Runoff of stormwater might also carry surface residual containing bacteria. Listed in Table 13 below are the LASs in the Ogeechee River Basin and the two (2) LASs that could potentially impact the stream segments in this TMDL are identified.

Table 13: Permitted Land Application Systems in the Ogeechee River Basin

LAS Name	Permit No.	County	Type	Flow (MGD)	Impaired Stream Watershed
Bartow WPCP	GAJ020215	Jefferson	Municipal	0.05	Ogeechee River GAR030602020305
Davisboro WPCP	GAJ020242	Washington	Municipal	0.224	Ogeechee River GAR030602020305

Source: Georgia Pollutant Discharge Elimination System, GA EPD, Atlanta, Georgia, 2022

3.2.3.3 Landfills

Leachate from landfills may contain bacteria that could at some point reach surface waters. Sanitary (or municipal landfills) are the most likely to serve as a source of bacteria. These types of landfills receive household wastes, animal manure, offal, hatchery and poultry processing plant wastes, dead animals, and other types of wastes. Older sanitary landfills were not lined, and most have been closed. Those that remain active and have not been lined operate as construction/demolition landfills. Currently active sanitary landfills are lined and have leachate collection systems. All landfills, excluding inert landfills, are now required to install environmental monitoring systems for groundwater and methane sampling. Table 14 provides the landfills located in the Ogeechee River Basin.

Table 14: Permitted Landfills in the Ogeechee River Basin

Facility Name	Permit Number	County	Interest Type	Operating Status
ACM Georgia, LLC		Warren	SW- Private Industrial Landfill	
Bryan Co - SR 144 Spur Ph 1 (L)	015-005D(L)	Bryan	SW- Construction & Demolition Landfill	Archived
Bryan Co - SR 144 Spur Ph 2 (L)	015-008D(L)	Bryan	SW- Construction & Demolition Landfill	Closed/PCC
Bryan Co - US 280/Mill Creek (SL)	015-004D(SL)	Bryan	SW- Municipal Solid Waste Landfill	Closed/PCC
Burke County Solid Waste	017-002D(SL)	Burke	SW- Construction & Demolition Landfill	In-Closure
Carter - Quacco Rd (L)	025-063D(L)	Chatham	SW- Construction & Demolition Landfill	Archived
Centerpoint Garden City, LLC Landfill		Chatham	SW- Private Industrial Landfill	
Chatham Co - Chevis Rd (L)	025-038D(L)	Chatham	SW- Construction & Demolition Landfill	Closed/PCC
Chatham Co - I 16 Bloomingdale (L)	025-040D(L)	Chatham	SW- Construction & Demolition Landfill	Closed/PCC

Facility Name	Permit Number	County	Interest Type	Operating Status
Chatham Co - Sharon Park (L)	025-057D(L)	Chatham	SW- Construction & Demolition Landfill	Closed/PCC
Chatham Co - SR 367 Wilmington Island Ph 2 (L)	025-058D(L)	Chatham	SW- Construction & Demolition Landfill	Closed/PCC
Chatham Co-Thomas Ave (L)	025-056D(L)	Chatham	SW- Construction & Demolition Landfill	Closed/PCC
Clay - Ric US 80 (LI)		Chatham	SW- Private Industrial Landfill	
CLIFTON EQUIPMENT RENTAL CO		Chatham	SW- Private Industrial Landfill	
Crosby - Quacco Rd (L)	025-068D(L)	Chatham	SW- Construction & Demolition Landfill	Released
Dean Forest Landfill	025-051D(MSWL)	Chatham	SW- Municipal Solid Waste Landfill	Operating
Ductile Iron of America (LI)		Chatham	SW- Private Industrial Landfill	
E M Chemicals-O'Leary Rd (LI)		Chatham	SW- Private Industrial Landfill	
Effingham Co - SR 119 W Sprgfld (L)	051-007D(L)	Effingham	SW- Construction & Demolition Landfill	Archived
Effingham Co. SR17 Guyton Sanitary Landfill	051-005D(SL)	Effingham	SW- Municipal Solid Waste Landfill	Closed/PCC
Evans Co - Sikes Branch Claxton (L)	054-005D(L)	Evans	SW- Construction & Demolition Landfill	Closed/PCC
Evans Co - US 301 Claxton (SL)	054-004D(SL)	Evans	SW- Municipal Solid Waste Landfill	Closed/PCC
Evans County Little Bull Creek C&D Landfill	054-006D(C&D)	Evans	SW- Construction & Demolition Landfill	Operating
GA Power - Plant Vogtle #3 (LI)		Burke	SW- Private Industrial Landfill	
GA POWER/PLANT VOGTLE		Burke	SW- Private Industrial Landfill	
GA-PACIFIC WARRENTON C-N-S		Warren	SW- Private Industrial Landfill	
Garrett-Kelly Hill Rd (LI)		Chatham	SW- Private Industrial Landfill	
Georgia Pacific Consumer Operations, LLC (Savannah River Mill)		Effingham	SW- Private Industrial Landfill	
Georgia Power - Plant Kraft		Chatham	SW- Private Industrial Landfill	
Georgia Power - Plant Vogtle		Burke	SW- Private Industrial Landfill	
GEORGIA POWER CO PLANT MCINTOSH		Effingham	SW- Private Industrial Landfill	
Georgia Power Company - Plant McIntosh Ash Monofill #4		Effingham	SW- Private Industrial Landfill	
Gibson - CR 50 Ph 1 (SL)	062-002D(SL)	Glascok	SW- Municipal Solid Waste Landfill	Closed/PCC
GPA-Hutchinson Island (L)		Chatham	SW- Private Industrial Landfill	

Facility Name	Permit Number	County	Interest Type	Operating Status
International Paper - Blmgdale/Elkins Cmtry (LI)		Chatham	SW- Private Industrial Landfill	
International Paper-Carter Adams Cell #4		Chatham	SW- Private Industrial Landfill	
INTERSTATE PAPER CORP		Liberty	SW- Private Industrial Landfill	
Jefferson Co - US 1 (Avera Rd) (SL)	081-006D(SL)	Jefferson	SW- Municipal Solid Waste Landfill	Closed/PCC
Jefferson County MSWL CR 138 Waste Management Facility	081-011D(MSWL)	Jefferson	SW- Municipal Solid Waste Landfill	Operating
Jenkins Co - Old Louisville Rd (SL)	082-002D(SL)	Jenkins	SW- Municipal Solid Waste Landfill	Archived
Jenkins Co-CR 54 (SL)	082-004D(SL)	Jenkins	SW- Municipal Solid Waste Landfill	Closed/PCC
Jenkins County Transfer Station	082-005D(SL)	Jenkins	SW- Construction & Demolition Landfill	Operating
Liberty Co - CR 194 #3 (L)	089-011D(L)	Liberty	SW- Construction & Demolition Landfill	Closed/PCC
Liberty Co - Limerick Rd (SL)	089-016D(L)	Liberty	SW- Construction & Demolition Landfill	Closed/PCC
Macmillian - Dean Forest Rd (L)	025-066D(L)	Chatham	SW- Construction & Demolition Landfill	Closed/PCC
Millen - US 25 S (L)	082-003D(L)	Jenkins	SW- Construction & Demolition Landfill	Closed/PCC
Milliken & Company - Longleaf		Screven	SW- Private Industrial Landfill	
Port Wentworth - Augustine Creek (L)	025-046D(L)	Chatham	SW- Construction & Demolition Landfill	Archived
REPUBLIC SERVICES - Savannah Regional Industrial		Chatham	SW- Commercial Industrial Landfill	
Savannah - Bacon Park (L)	025-010D(L)	Chatham	SW- Construction & Demolition Landfill	Closed/PCC
Savannah Sugar-US 17 (LI)		Chatham	SW- Private Industrial Landfill	
Savannah-Dean Forest Rd (SL)	025-051D(SL)	Chatham	SW- Municipal Solid Waste Landfill	Operating
Screven County Municipal Solid Waste Landfill	124-003D(SL)	Screven	SW- Municipal Solid Waste Landfill	Closed/PCC
STATESBORO/BULLOCH CO LANDFILL	016-007D(SL)	Bulloch	SW- Municipal Solid Waste Landfill	Closed/PCC
Superior Landfill & Recycling Center	025-070D(MSWL)	Chatham	SW- Municipal Solid Waste Landfill	Operating
Superior Sanitation - Little Neck Rd (SL)	025-045D(SL)	Chatham	SW- Municipal Solid Waste Landfill	Closed/PCC
Taliaferro Co - CR 10 Ph 1 (SL)	131-002D(SL)	Taliaferro	SW- Municipal Solid Waste Landfill	Closed/PCC
Taliaferro Co - CR 10 Ph 2 (SL)	131-003D(SL)	Taliaferro	SW- Municipal Solid Waste Landfill	Closed/PCC
Taliaferro Co - US 278 Crawfordville (SL)	131-001D(SL)	Taliaferro	SW- Municipal Solid Waste Landfill	Archived
Thiele Kaolin - CR 101 (LI)		Jefferson	SW- Private Industrial Landfill	

Facility Name	Permit Number	County	Interest Type	Operating Status
Tybee Island - Polk Ave/Van Horne Dr (L)	025-048D(L)	Chatham	SW- Construction & Demolition Landfill	Archived
Tyco International - CR 446 Ph 1 (LI)		Bulloch	SW- Private Industrial Landfill	
Tyco International - CR 446 Ph 2 (LI)		Bulloch	SW- Private Industrial Landfill	
Tyco International - CR 446 Ph 3&4 (LI)		Bulloch	SW- Private Industrial Landfill	
US Army - Ft Stewart Main Cantonment (SL)	089-010D(SL)	Liberty	SW- Municipal Solid Waste Landfill	Operating
US Army-Ft Stewart Main Cantonment (L)	089-020D(L)	Liberty	SW- Construction & Demolition Landfill	Operating
Wadley - Artesian St (L)	081-008D(L)	Jefferson	SW- Construction & Demolition Landfill	Closed/PCC
Warren Co - Shoal St #2 (SL)	149-008D(SL)	Warren	SW- Municipal Solid Waste Landfill	Closed/PCC
WASTE MANAGEMENT OF GEORGIA INC		Chatham	SW- Private Industrial Landfill	
Wrens - Industrial St (SL)	081-009D(SL)	Jefferson	SW- Municipal Solid Waste Landfill	Closed/PCC

Source: Land Protection Branch, GA EPD, 2022

4.0 ANALYTICAL APPROACH

The process of developing bacteria TMDLs for the Ogeechee River Basin listed segments includes the determination of the following:

- The current critical bacteria load to the stream under existing conditions;
- The TMDL for similar conditions under which the current load was determined; and
- The percent reduction in the current critical bacteria load necessary to achieve the TMDL.

The calculation of the bacteria load at any point in a stream requires the bacteria concentration and stream flow. The Loading Curve Approach was used to determine the current bacteria load and the TMDL. For the listed segments, fecal coliform sampling data were sufficient to calculate at least one 30-day geometric mean to compare with the regulatory criteria (see Appendix A).

4.1 Loading Curve Approach

For segments with TMDLs being revised, listings of some segments were based on spill data that is no longer available. Therefore, a current critical load and percent reduction cannot be determined. However, the annual average flow determined using [USGS StreamStats](#), (USGS, 2017) was used to calculate the TMDL. The StreamStats annual average flow for each stream with a revised TMDL are given in Table A-1 in Appendix A.

For those segments in which sufficient water quality data were collected to calculate at least one 30-day geometric mean above the water quality criteria, the loading curve approach was used to calculate the current critical load.

The TMDLs for this document were calculated using data from nearby USGS gages and the applicable water quality criterion. These nearby stream gages have relatively similar watershed characteristics, including land use, slope, and drainage area. The stream flows were estimated by multiplying the measured stream flow by the ratio of the listed stream drainage area to the gaged stream drainage area. Table 15 provides the USGS stream gages used to estimate the flow for the listed stream segments. For each listed segment, the drainage areas and USGS gages used to estimate stream flow are given in Table A-2 in Appendix A. The current critical load was compared to summer and winter seasonal TMDL curves to determine the required percent reduction.

Table 15: USGS Flow Gages Used to Estimate Stream Flow in the 303(d) Listed Segments in the Ogeechee River Basin

Waterbody Name	Location	USGS Station No.	USGS Station Name	Flow Gage Drainage Area (sq miles)
Buckhead Creek GAR030602010613	Eightmile Creek to Rocky Creek	02198100	Beaverdam Creek near Sardis, GA	30.8
Ogeechee River GAR030602020305	Long Branch to Nevills Creek	02202040	Ogeechee River at Rocky Ford Rd, near Rocky Ford, GA	1,950

Waterbody Name	Location	USGS Station No.	USGS Station Name	Flow Gage Drainage Area (sq miles)
Tributary to Mill Creek GAR030602020511	Unnamed tributary 0.3 miles upstream Sims Road to Mill Creek	02202600	Black Creek near Blichton, GA	232
Tributary to Salt Creek GAR030602040213	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway			
Upper Black Creek GAR030602020509	Crombly Pond to Lower Black Creek			
Ogeechee River GAR030602010409	Spring Creek to Williamson Swamp Creek	02201230	Ogeechee River at Midville, GA	1,340

The current critical loads were determined using fecal coliform data collected within a 30-day period to calculate the geometric means and multiplying these values by the arithmetic means of the flows measured at the time the water quality samples were collected. Georgia's instream bacteria criteria are based on a geometric mean of samples collected over a 30-day period, with samples collected at least 24 hours apart. To reflect this in the load calculation, the bacteria loads are expressed as 30-day accumulated loads with units of counts per 30 days. This is described by the equation below:

$$L_{\text{critical}} = C_{\text{geomean}} \times Q_{\text{mean}}$$

Where:

L_{critical} = current critical bacteria load
 C_{geomean} = bacteria concentration as a 30-day geometric mean
 Q_{mean} = stream flow as an arithmetic mean

The current estimated critical load is dependent on the fecal coliform concentrations and stream flows measured during the sampling events. The number of events sampled is usually 16 per year. Thus, these loads do not represent the full range of flow conditions or loading rates that can occur. Therefore, it must be kept in mind that the current critical loads used only represent the worst-case scenario that occurred during the sampling period.

The maximum bacteria load at which the instream bacteria criteria will be met can be determined using a variation of the equation above. By setting C equal to the seasonal, instream bacteria criteria, the load will equal the TMDL. However, the TMDL is dependent on stream flow. Figures in Appendix A graphically illustrate that the TMDL is a continuum for the range of flows (Q) that can occur in the stream over time. There are two TMDL curves shown in these figures. One represents the summer TMDL for the period May through October when the 30-day geometric mean criteria is 200 counts/100 mL. The second curve represents the winter TMDL for the period November through April when the 30-day geometric mean criteria is 1,000 counts/100 mL. The equations for these two TMDL curves are:

$$\text{TMDL}_{\text{summer}} = 200 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

$$\text{TMDL}_{\text{winter}} = 1,000 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

The graphs show the relationship between the current critical load (L_{critical}) and the TMDL. The TMDL for a given stream segment is the load for the mean flow corresponding to the current critical load. This is the point where the current load exceeds the TMDL curve by the greatest amount. This critical TMDL can be represented by the following equation:

$$\text{TMDL}_{\text{critical}} = C_{\text{standard}} \times Q_{\text{mean}}$$

Where:

$$\begin{aligned} \text{TMDL}_{\text{critical}} &= \text{critical bacteria TMDL load} \\ C_{\text{standard}} &= \text{seasonal bacteria criteria (as a 30-day geometric mean)} \\ &\quad \text{summer - 200 counts/100 mL as fecal coliform} \\ &\quad \text{winter - 1,000 counts/ 100 mL as fecal coliform} \\ Q_{\text{mean}} &= \text{stream flow as an arithmetic mean} \end{aligned}$$

A 30-day geometric mean load that plots above the respective seasonal TMDL curve represents an exceedance of the instream bacteria criteria. The difference between the current critical load and the TMDL curve represents the load reduction required for the stream segment to meet the appropriate instream bacteria criteria. There is also a single sample maximum criterion of 4,000 counts per 100 mL for fecal coliform. If a single sample exceeds the maximum criterion, and the seasonal geometric mean criteria is also exceeded, then the TMDL is based on the criteria exceedance requiring the largest load reduction.

For future *E. coli* or enterococci TMDLs, one curve will represent the summer TMDL for the period May through October when the 30-day geometric mean criterion is 126 counts/100 mL and 35 counts/100 mL, respectively. The second curve will represent the winter TMDL for the period November through April when the 30-day geometric mean criterion is 265 counts/100 mL or 74 counts/100 mL, respectively. The equations for these two TMDL curves are:

Non-Estuarine waters:

$$\begin{aligned} \text{TMDL}_{\text{summer}} &= 126 \text{ counts } E. coli /100 \text{ mL (as a 30-day geometric mean)} \times Q \\ \text{TMDL}_{\text{winter}} &= 265 \text{ counts } E. coli /100 \text{ mL (as a 30-day geometric mean)} \times Q \end{aligned}$$

Estuarine waters:

$$\begin{aligned} \text{TMDL}_{\text{summer}} &= 35 \text{ counts enterococci /100 mL (as a 30-day geometric mean)} \times Q \\ \text{TMDL}_{\text{winter}} &= 74 \text{ counts enterococci /100 mL (as a 30-day geometric mean)} \times Q \end{aligned}$$

The TMDL for a given stream segment is the load for the mean flow corresponding to the current critical fecal coliform load. This is the point where the current fecal coliform load exceeds the fecal coliform TMDL curve by the greatest amount. This critical TMDL can be represented by the following equation:

$$\text{TMDL}_{\text{critical}} = C_{\text{standard}} \times Q_{\text{mean}}$$

Where:

$TMDL_{critical}$ = critical bacteria TMDL load
 $C_{standard}$ = seasonal bacteria criteria (as a 30-day geometric mean)
 Non-Estuarine waters:
 summer – 126 counts/100 mL as *E. coli*
 winter – 265 counts/ 100 mL as *E. coli*
 Estuarine waters:
 summer – 35 counts/100 mL as enterococci
 winter – 74 counts/ 100 mL as enterococci
 Q_{mean} = stream flow as an arithmetic mean

Under the updated criteria adopted and approved in 2022 there is also a seasonally-based statistical threshold value (STV) maximum criterion established for both non-estuarine and estuarine waters. For the months of May through October the STV criterion for non-estuarine waters is 410 counts per 100 mL for *E. coli*. For the same period, the STV criterion for estuarine waters is 130 counts per 100 mL for enterococci. For the months of November through April the STV criterion for non-estuarine waters is 861 counts per 100 mL for *E. coli*. For the same period, the STV criterion for estuarine waters is 273 counts per 100 mL for enterococci. If a single sample exceeds the STV maximum criterion, and the seasonal geometric mean criteria is also exceeded, then the TMDL is based on the criteria exceedance requiring the largest load reduction. For a TMDL, the percent load reduction can be expressed as follows:

$$\text{Percent Load Reduction} = \frac{L_{critical} - TMDL_{critical}}{L_{critical}} \times 100$$

The current critical loads and the TMDLs are expressed as equations that show the loads as a function of the total flow at any given time. The general equations for the critical load and the TMDL are:

$$L_{critical} = Q_{total} \times C_{geomean}$$

Where:

$L_{critical}$ = current critical bacteria load
 $C_{geomean}$ = bacteria concentration as a 30-day geometric mean
 Q_{total} = stream flow

$$TMDL = C_{criterion} \times Q_{total}$$

Where:

$TMDL$ = total maximum daily load
 $C_{criterion}$ = criterion
 Q_{total} = estimated instantaneous flow

5.0 TOTAL MAXIMUM DAILY LOAD

A Total Maximum Daily Load (TMDL) is the amount of a pollutant that can be assimilated by the receiving waterbody without exceeding the applicable water quality criteria. In this case, it is the seasonal bacteria criteria. A TMDL is the sum of the individual wasteload allocations (WLAs) for point sources and load allocations (LAS) for nonpoint sources, as well as natural background (40 CFR 130.2) for a given waterbody. The TMDL must also include a margin of safety (MOS), either implicitly or explicitly, that accounts for the uncertainty in the relationship between pollutant loads and the water quality response of the receiving waterbody. TMDLs can be expressed in terms of either mass per time, toxicity, or other appropriate measures. For bacteria, the TMDLs are expressed as counts per 30 days as a geometric mean.

A TMDL is expressed as follows:

$$\text{TMDL} = \Sigma \text{WLAs} + \Sigma \text{LAS} + \text{MOS}$$

The TMDL calculates the WLAs and LAS with a margin of safety to meet the stream's water quality standards. The allocations are based on estimates that use the best available data and provide the basis to establish or modify existing controls so that water quality standards can be achieved. In developing a TMDL, it is important to consider whether adequate data are available to identify the sources, and to understand the fate and transport of the pollutant(s) to be controlled.

TMDLs may be developed using a phased approach. Under a phased approach, the TMDL includes: 1) WLAs that confirm existing limits and controls or lead to new limits, and 2) LAS that confirm existing controls or include implementing new controls (USEPA, 1991). A phased TMDL requires additional data be collected to determine if load reductions required by the TMDL are leading to the attainment of water quality standards.

Watershed-based plans may be developed to address and assess both point and nonpoint sources. These plans establish a schedule or timetable for the installation and evaluation of source control measures, data collection, and assessment of water quality standard attainment. Future monitoring of the listed segments water quality may be used to evaluate this phase of the TMDL, and if necessary, to reallocate the loads.

The existing fecal coliform loads calculated for each listed stream segment are based on sampling data and measured or estimated flows and represent the sum of the total loads from all point and nonpoint sources for the segment. In situations where two or more adjacent segments are listed, the fecal coliform loads to each segment are individually evaluated on a localized watershed basis. The following sections describe the various bacteria TMDL components.

5.1 Wasteload Allocations

5.1.1 Wastewater Treatment Facilities

The wasteload allocation (WLA) is the portion of the receiving water's loading capacity that is allocated to existing or future point sources. WLAs are provided to the point sources from POTW and Non-POTW wastewater treatment systems with NPDES end-of-pipe effluent limits established to meet the applicable water quality standard. In addition, the permits include routine monitoring and reporting requirements.

For facilities that currently have a bacteria effluent limit, the permit information, receiving stream, impaired stream and WLAs are provided in Table 16. This information is provided for facilities that discharge into or within 25 miles upstream of the listed segment. In most cases, the WLAs are calculated based on permitted or design flow and permitted bacteria concentration. However, for those facilities whose wastewater is reused, the bacteria limit to discharge into surface waters may be overly restrictive and for these facilities the WLA is calculated using the permitted flow and permitted bacteria concentration. This was expressed as an accumulated load over a 30-day period and presented in units of counts per 30 days. If there is a new facility or a facility expands its capacity and the permitted flow increases, the wasteload allocation for the facility will be the permitted flow times the appropriate water quality criteria, either 200 counts/100 mL for fecal coliform or 126 counts/100 mL for *E. coli* as a 30-day geometric mean.

Table 16: WLAs for the Facilities that Currently have Bacteria Limits in the Ogeechee River Basin

Facility Name	NPDES Permit No.	Receiving Stream	Listed Stream Segment	Bacterial Indicator	WLA (counts/30 days)	30 Day Geometric Mean Concentration (counts/100mL)
Forstmann WPCP (City of Louisville)	GA0050243	Ogeechee River	Ogeechee River GAR030602010409	Fecal coliform	2.34E+10	200
				<i>E. coli</i>	1.48E+10	126
Gibson WPCP	GA0021849	Rocky Comfort Creek	Ogeechee River GAR030602010409	Fecal coliform	1.05E+10	200
				<i>E. coli</i>	6.64E+09	126
Millen WPCP	GA0038750	Tributary to the Ogeechee River	Ogeechee River GAR030602020305	Fecal coliform	1.11E+10	200
				<i>E. coli</i>	7.01E+09	126
Pembroke WPCP	GA0038377	Tributary to Mill Creek	Tributary to Mill Creek GAR030602020511	Fecal coliform	4.10E+09	200
				<i>E. coli</i>	2.58E+09	126

Non-POTW facilities that discharge sanitary wastewater directly or sanitary waste streams commingled with other waste streams will be given a bacteria effluent limit in their permit. Potential WLAs for existing Non-POTW permittees without bacteria permit limits would be the facility design flow multiplied by the appropriate bacteria criterion, either 200 counts/100 mL for fecal coliform or 126 counts/100 mL for *E. coli* as a 30-day geometric mean. For these facilities, it is not known if their discharge contains any bacteria at levels that would exceed the instream water quality criteria because of the type of treatment processes employed. Therefore, existing Non-POTW facilities may be required to submit bacteria data with their NPDES permit renewal application. Non-POTW permittees must collect, analyze, and submit appropriate bacteria data from at least 4 samples collected 24 hours apart within a 30-day period. GA EPD will evaluate these data and determine if a permit limit for bacteria is needed. There are currently five (5) known existing Non-POTW discharges without bacteria permit limits in the contributing watersheds, as noted in Table 7.

5.1.2 Regulated Stormwater Discharges

State and Federal Rules define stormwater discharges covered by NPDES permits as point sources. However, stormwater discharges are from diffuse sources and there are multiple

stormwater outfalls. Stormwater sources (point and nonpoint) are different than traditional NPDES permitted sources in four respects: 1) they do not produce a continuous (pollutant loading) discharge; 2) their pollutant loading depends on the intensity, duration, and frequency of rainfall events, over which the permittee has no control; 3) the activities contributing to the pollutant loading may include the various allowable activities of others, and control of these activities is not solely within the discretion of the permittee; and 4) they do not have wastewater treatment plants that control specific pollutants to meet numerical limits.

The intent of stormwater NPDES permits is not to treat the water after collection, but to reduce the exposure of stormwater to pollutants by implementing various controls. It would be infeasible and prohibitively expensive to control pollutant discharges from each stormwater outfall. Therefore, stormwater NPDES permits require the establishment of controls or BMPs to reduce the pollutants entering the environment.

The wasteload allocations from stormwater discharges (WLA_{sw}) associated with MS4s are estimated based on the percentage of urban area in each watershed covered by the MS4 stormwater permit. At this time, the portion of each watershed that goes directly to a permitted storm sewer or is non-permitted sheet flow or diffuse runoff has not been clearly defined. Thus, it is assumed that approximately 70 percent of stormwater runoff from the regulated urban area is collected by the MS4s. This can be represented by the following equation:

$$WLA_{SW} = Q_{WLA_{sw}} \times C_{standard}$$

where: WLA_{SW} = Wasteload Allocation for permitted storm water runoff from all MS4 urban areas

Q_{WLA_{sw}} = Runoff from all MS4 urban areas conveyed through permitted storm water structures

$$Q_{WLA_{sw}} = \sum Q_{urban} \times 0.7$$

$\sum Q_{urban}$ = Sum of all storm water runoff from MS4 urban

C_{standard} = seasonal criteria as appropriate (as a 30-day geometric mean)

summer – 200 counts/100 mL as fecal coliform

winter – 1000 counts/ 100 mL as fecal coliform

summer – 126 counts/100 mL as *E. coli*

winter – 265 counts/ 100 mL as *E. coli*

summer – 35 counts/100 mL as enterococci

winter – 74 counts/ 100 mL as enterococci

For stormwater permits, compliance with the terms and conditions of the permit is effective implementation of the WLA to the Maximum Extent Practicable (MEP) and demonstrates consistency with the assumptions and requirements of the TMDL. GA EPD acknowledges that progress with the assumptions and requirements of the TMDL by stormwater permittees may take one or more permit iterations. Achieving the TMDL reductions may constitute compliance with a SWMP or a SWPPP, provided the MEP definition is met, even where the numeric percent reduction may not be achieved so long as reasonable progress is made toward attainment of water quality standards using an iterative BMP process.

5.1.3 Concentrated Animal Feeding Operations

Wet manure facilities are either included under a State-issued LAS General Permit or an NPDES General Permit. A small number of wet manure operations have an individual NPDES permit. Dry manure facilities are not required to obtain permits. None of the wet manure or dry manure

facilities have discharges Presently, there are seven (7) wet or dry manure CAFOs located in the watersheds of the listed segments in the Ogeechee River Basin, and therefore they were not provided a WLA.

5.2 Load Allocations

The load allocation is the portion of the receiving water's loading capacity that is attributed to existing or future nonpoint sources or to natural background sources. Nonpoint sources are identified in 40 CFR 130.6 as follows:

- Residual waste;
- Land disposal;
- Agricultural and silvicultural;
- Mines;
- Construction;
- Saltwater intrusion; and
- Urban stormwater (non-permitted).

The LA is calculated as the remaining portion of the TMDL load available, after allocating the WLA, WLAsw, and the MOS, using the following equation:

$$LA = TMDL - (\Sigma WLA + \Sigma WLAsw + MOS)$$

As described above, there are two types of load allocations: loads to the stream independent of precipitation, including sources such as failing septic systems, leachate from landfills, animals in the stream, leaking sewer system collection lines, and background loads; and loads associated with bacteria accumulation on land surfaces that is washed off during storm events, including runoff from saturated LAS fields. Currently, it is not possible to partition the various sources of load allocations. In the future, after additional data has been collected, it may be possible to partition the load allocation by source.

5.3 Seasonal Variation

The Georgia bacteria criteria are seasonal. One set of criteria applies to the summer season, while a different set applies to the winter season. To account for seasonal variations, the critical loads for each listed segment were determined from sampling data obtained during both summer and winter seasons, when possible. The TMDL and percent reduction for each listed segment is based on the season in which the critical load occurred. The TMDLs for each season, for any given flow, are presented as equations in Section 5.5.

5.4 Margin of Safety

The MOS is a required component of TMDL development. There are two basic methods for incorporating the MOS: 1) implicitly incorporate the MOS using conservative modeling assumptions to develop allocations; or 2) explicitly specify a portion of the TMDL as the MOS and use the remainder for allocations. For this TMDL, an explicit MOS of 10 percent of the TMDL was used.

5.5 Total Bacteria Load

The bacteria TMDL for the listed stream segment is dependent on the time of year, the stream flow, and the applicable state water quality criteria. In January 2022, the Georgia DNR Board adopted new bacteria criteria for “Fishing” and “Drinking Water” designated uses using the bacterial indicators *E. coli* and enterococci. These bacteria are better indicators for human health illnesses. The adopted criteria have the same estimated illness rate (8 per 1000 swimmers) as the previously established fecal coliform criteria. Since this TMDL is based on fecal coliform data, but the current bacteria criterion is *E. coli*, this TMDL will use both fecal coliform and *E. coli* as the bacterial indicators.

The total maximum daily seasonal fecal coliform loads for Georgia are given below:

$$\text{TMDL}_{\text{summer}} = 200 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

$$\text{TMDL}_{\text{winter}} = 1000 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

$$\text{TMDL} = 4000 \text{ counts/100 mL (instantaneous)} \times Q$$

The total maximum daily seasonal *E. coli* loads for non-estuarine waters in Georgia are given below:

$$\text{TMDL}_{\text{summer GEO}} = 126 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

$$\text{TMDL}_{\text{summer STV}} = 410 \text{ counts/100 mL (instantaneous)} \times Q$$

$$\text{TMDL}_{\text{winter GEO}} = 265 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

$$\text{TMDL}_{\text{winter STV}} = 861 \text{ counts/100 mL (instantaneous)} \times Q$$

The total maximum daily seasonal enterococci loads for estuarine waters in Georgia are given below:

$$\text{TMDL}_{\text{summer GEO}} = 35 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

$$\text{TMDL}_{\text{summer STV}} = 130 \text{ counts/100 mL (instantaneous)} \times Q$$

$$\text{TMDL}_{\text{winter GEO}} = 74 \text{ counts/100 mL (as a 30-day geometric mean)} \times Q$$

$$\text{TMDL}_{\text{winter STV}} = 273 \text{ counts/100 mL (instantaneous)} \times Q$$

For purposes of determining necessary load reductions required to meet the instream water quality criteria, the current critical TMDL was determined. This load is the product of the applicable seasonal bacteria criteria and the mean flow used to calculate the current fecal coliform critical load. It represents the sum of the allocated loads from point (WLA and WLA_{sw}) and nonpoint (LA) sources located within the immediate drainage area of the listed segment, and a margin of safety (MOS). For these calculations, the bacteria contributed by a permitted facility to the WLA was the product of the bacteria permit limit concentration and the monthly average permitted flow. The current critical loads and corresponding TMDLs, WLAs (WLA and WLA_{sw}), LAs, MOSs, and percent load reductions for the Ogeechee River Basin listed stream segments are presented in Table 16.

The relationships of the current critical loads to the TMDLs are shown graphically in Appendix A. The vertical distance between the two values represents the load reductions necessary to achieve the TMDLs. Because of the localized nature of the load evaluations, the calculated bacterial load reductions pertain to point and nonpoint sources occurring within the immediate drainage area of the listed segment. The current critical values represent a worst-case scenario for the limited set of data. Thus, the load reductions required are conservative estimates, and should be sufficient to prevent exceedances of the instream bacteria criteria for a wide range of conditions.

Evaluation of the relationship between instream water quality and the potential sources of pollutant loading is an important component of TMDL development and is the basis for later implementation of corrective measures and BMPs. For the current TMDLs, the association between bacterial loads and the potential sources occurring within the sub-watershed of each segment was examined on a qualitative basis.

Table 17: Bacteria Loads and Required Load Reductions

AUID	Stream Segment	Description	Bacterial Indicator	Current Load (counts/ 30 days)	TMDL Components					Reduction Required
					WLA (counts/ 30 days) ⁽¹⁾	WLASw (counts/ 30 days)	LA (counts/ 30 days)	MOS (counts/ 30 days)	TMDL (counts/ 30 days)	
GAR030602010613	Buckhead Creek	Eightmile Creek to Rocky Creek	Fecal coliform	1.08E+12	--	--	3.69E+11	4.10E+10	4.10E+11	62.1%
			<i>E. coli</i>	⁽²⁾	--	--	2.32E+11	2.58E+10	2.58E+11	Undetermined ⁽³⁾
GAR030602040120	Bull River	Richardson Creek to Lazaretto River	Fecal coliform	72.3*Q	--	--	14* Q _{LA} ⁽⁵⁾	1.4* Q _{Total} ⁽⁵⁾	14*Q _{Total} ⁽⁵⁾	68.2%
			enterococci	⁽²⁾	--	35 x Q _{WLASw} ⁽⁵⁾	35 x Q _{LA} ⁽⁵⁾	3.5 x Q _{WLASw} ⁽⁵⁾	35 x Q _{Total} ⁽⁵⁾	Undetermined ⁽³⁾
GAR030602010409	Ogeechee River	Spring Creek to Williamson Swamp Creek	Fecal coliform	8.43E+11	3.40E+10	--	6.70E+11	7.83E+10	7.83E+11	7.2%
			<i>E. coli</i>	⁽²⁾	2.14E+10	--	4.22E+11	4.93E+10	4.93E+11	Undetermined ⁽³⁾
GAR030602020305	Ogeechee River	Long Branch to Nevills Creek	Fecal coliform	4.13E+12	1.11E+10	--	1.37E+12	1.54E+11	1.54E+12	62.7%
			<i>E. coli</i>	⁽²⁾	7.01E+09	--	8.65E+11	9.69E+10	9.69E+11	Undetermined ⁽³⁾
GAR030602020511	Tributary to Mill Creek	Unnamed Tributary 0.3 miles upstream Sims Road to Mill Creek	Fecal coliform	2.88E+10	4.10E+09	--	8.73E+09	1.43E+09	1.43E+10	50.6%
			<i>E. coli</i>	⁽²⁾	2.58E+09	--	5.50E+09	8.98E+08	8.98E+09	Undetermined ⁽³⁾
GAR030602040213	Tributary to Salt Creek	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway	Fecal coliform	1.67E+10	--	1.38E+09	2.29E+09	4.07E+08	4.07E+09	75.6%
			<i>E. coli</i>	⁽²⁾	E	8.67E+08	1.44E+09	2.56E+08	2.56E+09	Undetermined ⁽³⁾
GAR030602020509	Upper Black Creek	Crombly Pond to Lower Black Creek	Fecal coliform	1.13E+12	--	--	4.44E+11	4.93E+10	4.93E+11	56.3%
			<i>E. coli</i>	8.59E+11	--	--	1.77E+11	1.97E+10	1.97E+11	77.1%
Revised TMDLs										
GAR030602020301	Jackson Branch	Downstream King Finishing Company from SR17 to Ogeechee River, Dover	Fecal coliform	⁽⁴⁾	--	--	6.49E+10	7.21E+09	7.21E+10	Undetermined ⁽³⁾
			<i>E. coli</i>	⁽⁴⁾	--	--	4.09E+10	4.54E+09	4.54E+10	Undetermined ⁽³⁾
GAR030602020303	Jackson Branch	Upstream King Finishing Company from SR 17 to County Road 39, Dover	Fecal coliform	⁽⁴⁾	--	--	6.13E+10	6.81E+09	6.81E+10	Undetermined ⁽³⁾
			<i>E. coli</i>	⁽⁴⁾	--	--	3.86E+10	4.29E+09	4.29E+10	Undetermined ⁽³⁾

Notes:

- (1) The assigned bacterial load from the NPDES permitted facility for WLA was determined as the product of the permitted flow and bacteria permit limit.
- (2) Sample was 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.
- (4) Critical loading could not be determined due to no samples collected.
- (5) These segments are tidal in nature. Therefore WLASw, load allocation, MOS and the TMDL are expressed as a function of the flow Q at any given time.

6.0 RECOMMENDATIONS

The TMDL process consists of an evaluation of the sub-watersheds for each 303(d) listed stream segment to identify, as best as possible, the sources of the bacteria loads causing the stream to exceed instream criteria. The TMDL analysis was performed using the best available data to specify WLAs and LAs that will meet bacteria water quality criteria to support the use classification specified for the listed segment.

This TMDL represents part of a long-term process to reduce bacteria loading to meet water quality standards in the Ogeechee River Basin. Implementation strategies will be reviewed and the TMDL will be refined, as necessary, in the next phase (next five-year cycle). The phased approach will support progress toward water quality standards attainment in the future. In accordance with USEPA TMDL guidance, the TMDL may be revised based on the results of future monitoring and source characterization data efforts. The following recommendations emphasize further source identification and involve the collection of data to support the current allocations and subsequent source reductions.

6.1 Monitoring

Water quality monitoring is conducted at several locations across the State each year. Sampling is conducted statewide by GA EPD personnel in Atlanta, Augusta, Brunswick, Cartersville, and Tifton. Additional monitoring sites are added as necessary.

In the case where a watershed-based plan has been developed for a listed stream segment, an appropriate water quality monitoring program will be outlined. The monitoring program will be developed to help identify the various bacteria sources. The monitoring program may be used to verify the 303(d) stream segment listings. This will be especially valuable for those segments where limited data resulted in the listing.

6.2 Bacteria Management Practices

Based on the findings of the source assessment, NPDES point source bacteria loads from wastewater treatment facilities usually do not significantly contribute to the impairment of the listed stream segments. This is because most facilities are required to treat to levels corresponding to instream water quality criteria. Sources of bacteria in urban areas include wastes that are attributable to domestic animals, leaks and overflows from sanitary sewer systems, illicit discharges of sanitary waste, leaking septic systems, runoff from improper disposal of waste materials, and leachate from both operational and closed landfills. In agricultural areas, potential sources of bacteria may include CAFOs, animals grazing in pastures, dry manure storage facilities and lagoons, chicken litter storage areas, and direct access of livestock to streams. Wildlife, especially waterfowl and mammals living close to or in water environments, can be a significant source of bacteria.

Management practices are recommended to reduce bacteria source loads to the listed 303(d) stream segments, with the result of achieving the instream bacteria criteria. These recommended management practices include:

- Compliance with NPDES (wastewater, construction, industrial stormwater, and/or MS4) permit limits and requirements;

- Ensure stormwater management plans are in place and being implemented by the local governments located in the watershed;
- Implementation of Georgia's *Statewide Nonpoint Source Management Plan* (GA EPD, 2019)
- Implementation of recommended Water Quality management practices in the *Coastal Georgia Regional Water Plan or the Savannah-Upper Ogeechee Water Planning Regional Water Plan* (GA EPD, 2017);
- Implementation of *Georgia's Best Management Practices for Forestry* (GFC, 2019);
- Implementation of *Best Management Practices for Georgia Agriculture* (GSWCC, 2013) and Adoption of National Resource Conservation Service (NRCS) Conservation Practices for agriculture;
- Adoption and implementation of the *Georgia Stormwater Management Manual* (ARC, 2016) and the *Coastal Stormwater Supplement to the Georgia Stormwater Management Manual* (CWP, 2009) to facilitate water quality treatment of stormwater runoff, including bacteria removal, through structural stormwater BMP installation.

6.2.1 Point Source Approaches

The NPDES permit program provides a basis for municipal, industrial, and stormwater permits, monitoring and compliance with permit limitations, and appropriate enforcement actions for violations. In accordance with GA EPD rules and regulations, all discharges from point source facilities are required to follow the conditions of their NPDES permit at all times. Wastewater treatment plants with the potential for bacteria in their discharge are given end-of-pipe limits to meet the applicable water quality standard. In addition, the permits include routine monitoring and reporting requirements.

Achieving the TMDL reductions may constitute compliance with a SWMP or SWPPP, provided the MEP definition is met, even where the numeric percent reduction may not be achieved so long as reasonable progress is made toward attainment of water quality standards using an iterative BMP process.

6.2.2 Nonpoint Source Approaches

GA EPD is the lead agency for implementing the State's Nonpoint Source Management Program, as described in Georgia's *Statewide Nonpoint Source Management Plan* (GA EPD, 2019). GA EPD will continue to work with local governments, agricultural, and forestry agencies such as the Natural Resources Conservation Service (NRCS), the Georgia Soil and Water Conservation Commission (GSWCC), and the Georgia Forestry Commission (GFC) to foster the implementation of BMPs that address nonpoint source pollution. The following sections describe programs in place and recommendations which should result in reducing nonpoint source loads of bacteria in Georgia's surface waters.

6.2.2.1 Agricultural Sources

GA EPD should coordinate with other agencies that are responsible for agricultural activities in the state to address issues concerning bacteria loading from agricultural lands. It is recommended that information such as livestock populations by sub-watershed, animal access to streams, manure storage and application practices be periodically reviewed so that watershed evaluations

can be updated to reflect current conditions. It is also recommended that BMPs be utilized to reduce the number of bacteria transported to surface waters from agricultural sources to the maximum extent practicable.

The following three organizations have primary responsibility for working with farmers to promote soil and water conservation, and to protect water quality:

- University of Georgia (UGA - Cooperative Extension Service);
- Georgia Soil and Water Conservation Commission (GSWCC); and
- Natural Resources Conservation Service (NRCS).

UGA has faculty, County Cooperative Extension Agents, and technical specialists who provide services in several key areas relating to agricultural impacts on water quality. GA EPD designated the GSWCC as the lead agency for agricultural Nonpoint Source Management in the State. The GSWCC develops nonpoint source management programs and conducts educational activities to promote conservation and protection of land and water devoted to agricultural uses.

The NRCS works with federal, state, and local governments to provide financial and technical assistance to farmers. The NRCS develops standards and specifications for BMPs that are to be used to improve, protect, and/or maintain our state's natural resources. In addition, every five years, the NRCS conducts the National Resources Inventory (NRI). The NRI is a statistically-based sample of land use and natural resource conditions and trends that covers non-federal land in the United States.

The NRCS is also providing technical assistance to the GSWCC and the GA EPD with the Georgia River Basin Planning Program. Planning activities associated with this program will describe conditions of the agricultural natural resource base once every five years. It is recommended that the GSWCC and the NRCS continue to encourage BMP implementation, education efforts, and river basin surveys with regard to river basin planning.

6.2.2.2 Urban Sources

Both point and nonpoint sources of bacteria can be significant in the Ogeechee River Basin urban areas. Urban sources of bacteria can best be addressed using a strategy that involves stormwater management, public participation, and intergovernmental coordination to reduce the discharge of pollutants to the maximum extent practicable. Management practices, control techniques, public education, and other appropriate methods and provisions may be employed. The following activities and programs conducted by cities, counties, and state agencies are recommended:

- Implement stormwater BMPs that incorporate water quality treatment and/or pollutant removal
- Uphold requirements that all new and replacement sanitary sewerage systems be designed to minimize discharges into storm sewer systems;
- Further develop and streamline mechanisms for reporting and correcting illicit connections, breaks, surcharges, and general sanitary sewer system problems;
- Continue efforts to increase public awareness and education towards the impact of human activities in urban settings on water quality, ranging from the

consequences of industrial and municipal discharges to the activities of individuals in residential neighborhoods.

6.3 Reasonable Assurance

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 criteria and use classifications, assessing and reporting water quality conditions, and regulating land use activities that may affect water quality. Georgia is working with local governments, agricultural and forestry agencies, such as the NRCS the GSWCC, and the GFC, to foster the implementation of BMPs to address nonpoint sources. In addition, public education efforts will be targeted to individual stakeholders to provide information regarding the use of BMPs to protect water quality.

6.4 Public Participation

A thirty-day public notice is being provided for this TMDL. During that time, the TMDL will be available on the GA EPD website, a copy of the TMDL will be provided on request, and the public will be invited to provide comments on the TMDL.

7.0 INITIAL TMDL IMPLEMENTATION PLAN

This plan identifies applicable State-wide programs and activities that may be employed to manage point and nonpoint sources of bacteria loads for the segment in the Ogeechee River Basin. Local watershed planning and management initiatives will be fostered, supported, or developed through a variety of mechanisms. Implementation may be addressed by Watershed-Based Plans or other assessments funded by Section 319(h) grants, the local development of watershed protection plans, or “Targeted Outreach” initiated by GA EPD. These initiatives will supplement or possibly replace this initial implementation plan. Implementation actions should also be guided by the recommended management practices and actions contained within each applicable Regional Water Plan developed as part of *Georgia’s Comprehensive State-wide Water Management Plan* implementation (Georgia Water Council, 2008).

7.1 Impaired Segments

This initial plan is applicable to the following waterbody that was added to Georgia’s 2022 Integrated 305(b)/303(d) List of not supporting waters in *Water Quality in Georgia 2020-2021* (GA EPD, 2022) available on the GA EPD [website](#). The following tables summarize the descriptive information provided in the 303(d) list.

Table 18: Stream Segments Listed on the 2022 303(d) List for Bacteria in the Ogeechee River Basin

Stream Segment	Location	Assessment Unit ID	Segment Length (miles)	Designated Use	Estuarine Status
Buckhead Creek	Eightmile Creek to Rocky Creek	GAR030602010613	5.2	Fishing	Non-estuarine
Bull River	Richardson Creek to Lazaretto River	GAR030602040120	5	Fishing	Estuarine
Ogeechee River	Spring Creek to Williamson Swamp Creek	GAR030602010409	9	Fishing	Non-estuarine
Ogeechee River	Long Branch to Nevills Creek	GAR030602020305	12	Fishing	Non-estuarine
Tributary to Mill Creek	Unnamed tributary 0.3 miles upstream Sims Road to Mill Creek	GAR030602020511	5	Fishing	Non-estuarine
Tributary to Salt Creek	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway	GAR030602040213	1.3	Fishing	Non-estuarine
Upper Black Creek	Crombly Pond to Lower Black Creek	GAR030602020509	12	Fishing	Non-estuarine

Table 19: Stream Segments with Revised TMDLs for Bacteria in the Ogeechee River Basin

Stream Segment	Location	Assessment Unit ID	Segment Length (miles)	Designated Use	Estuarine Status	Original TMDL Action ID Number, Agency, and Year
Jackson Branch	Upstream King Finishing Company from SR 17 to County Road 39, Dover	GAR030602020303	2	Fishing	Non-estuarine	#568 US EPA 1998
Jackson Branch	Downstream King Finishing Company from SR17 to Ogeechee River, Dover	GAR030602020301	1	Fishing	Non-estuarine	#568 US EPA 1998

The water use classification for the listed stream segments in the Ogeechee River Basin is “Fishing.” The criterion violated is listed as fecal coliform. The potential causes listed include urban runoff and nonpoint sources. The “Fishing” bacteria water quality criteria as approved by US EPA Region 4 on January 20, 2021, and applicable at the time of listing was as follows:

- (c) Fishing: Propagation of Fish, Shellfish, Game and Other Aquatic Life; primary contact recreation in and on the water for the months of May – October, secondary contact recreation in and on the water for the months of November – April; or for any other use requiring water of a lower quality.
 - (i) Bacteria:
 1. For the months of May through October, when water contact recreation activities are expected to occur, fecal coliform not to exceed a geometric mean of 200 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. Should water quality and sanitary studies show fecal coliform levels from non-human sources exceed 200 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean fecal coliform shall not exceed 300 counts per 100 mL in lakes and reservoirs and 500 counts per 100 mL in free flowing freshwater streams. For the months of November through April, fecal coliform not to exceed a geometric mean of 1,000 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours and not to exceed a maximum of 4,000 counts per 100 mL for any sample. The State does not encourage swimming in these surface waters since a number of factors which are beyond the control of any State regulatory agency contribute to elevated levels of bacteria.
 2. For waters designated as shellfish growing areas by the Georgia DNR Coastal Resources Division, the requirements will be consistent with those established by the State and Federal agencies responsible for the National Shellfish Sanitation Program. The requirements are found in National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish, 2007 Revision (or most recent version), Interstate Shellfish Sanitation Conference, U.S. Food and Drug Administration.

In January 2022, the Georgia DNR Board adopted new bacteria criteria for “Fishing” and “Drinking Water” designated uses using the bacterial indicators *E. coli* and enterococci. These bacteria are better indicators for human health illnesses. The adopted criteria have the same estimated illness rate (8 per 1000 swimmers) as the previously established criteria. EPA approved the proposed standards August 31, 2022. Since this TMDL was written after EPA approved the new bacteria criteria, the TMDL will use both fecal coliform and the appropriate indicator identified above based on estuarine/non-estuarine status. The current bacteria water quality criteria for “Fishing” designated uses, as stated in the [the State of Georgia’s Rules and Regulations for Water Quality Control](#), Chapter 391-3-6-.03(6)(c)(iii) (GA EPD, 2022), are:

- (c) Fishing: Propagation of Fish, Shellfish, Game and Other Aquatic Life; primary contact recreation in and on the water for the months of May – October, secondary contact recreation in and on the water for the months of November – April; or for any other use requiring water of a lower quality.

(i) Bacteria:

1. Estuarine waters: For the months of May through October, when primary water contact recreation activities are expected to occur, culturable enterococci not to exceed a geometric mean of 35 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 130 counts per 100 mL the same 30-day interval.

For the months of November through April, culturable enterococci not to exceed a geometric mean of 74 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 273 counts per 100 mL in the same 30-day interval.

2. All other fishing waters: For the months of May through October, when primary water contact recreation activities are expected to occur, culturable *E. coli* not to exceed a geometric mean of 126 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an *E. coli* statistical threshold value (STV) of 410 counts per 100 mL in the same 30-day interval.

For the months of November through April, culturable *E. coli* not to exceed a geometric mean of 265 counts per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. There shall be no greater than a ten percent excursion frequency of an *E. coli* statistical threshold value (STV) of 861 counts per 100 mL in the same 30-day interval.

3. The State does not encourage swimming in these surface waters since a number of factors which are beyond the control of any State regulatory agency contribute to elevated levels of bacteria.
4. For waters designated as shellfish growing areas by the Georgia DNR Coastal Resources Division, the requirements will be consistent with those established by the State and Federal agencies responsible for the National Shellfish Sanitation Program. The requirements are found in National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish, 2007 Revision (or most recent version), Interstate Shellfish Sanitation Conference, U.S. Food and Drug Administration.

7.2 Potential Sources

An important part of the TMDL analysis is the identification of potential source categories. A source assessment characterizes the known and suspected bacteria sources in the watershed. Sources are broadly classified as either point or nonpoint sources. A point source is defined as a discernable, confined, and discrete conveyance from which pollutants are or may be discharged to surface waters. Point sources of bacteria include NPDES permittees discharging treated wastewater and stormwater. Nonpoint sources of bacteria are diffuse sources that cannot be identified as entering the waterbody at a single location. These sources generally involve land use activities that contribute bacteria to streams during a rainfall runoff event.

NPDES point source bacteria loads from wastewater treatment facilities usually do not contribute to impairments. This is because these facilities are required to treat to levels corresponding to instream water quality criteria. However, point sources can and do fail, which may contribute to

bacteria loads through leaks and overflows from sanitary sewer systems, CAFOs, or leachate from operational landfills.

Nonpoint sources of bacteria in urban areas include wastes that are attributable to domestic animals, illicit discharges of sanitary waste, leaking septic systems, runoff from improper disposal of waste materials, and leachate from closed landfills. In non-urban areas, potential sources of bacteria may include animals grazing in pastures, dry manure storage facilities and lagoons, chicken litter storage areas, and direct access of livestock to streams. Wildlife, especially waterfowl and mammals living close to or in water environments, can be a significant source of bacteria.

7.3 Management Practices and Activities

GA EPD is responsible for administering and enforcing laws to protect the waters of the State and is the lead agency for implementing the State's Nonpoint Source Management Program. Georgia is working with local governments, agricultural and forestry agencies such as the Georgia Department of Agriculture, NRCS, GSWCC, and GFC to foster implementation of BMPs that address nonpoint source pollution. The following management practices are recommended to reduce bacteria loads to stream segments:

- Sustain compliance with NPDES treated wastewater permit requirements;
- Sustain compliance with NPDES MS4 permit requirements, where applicable;
- Compliance with future NPDES Industrial General Permit requirements, including where applicable, achieving benchmark levels for monitored constituents;
- Ensure stormwater management plans are in place and being implemented by the local governments, and by the industrial facilities located in the watershed;
- Implementation of Georgia's *Statewide Nonpoint Source Management Plan* (GA EPD, 2019);
- Adoption and implementation of the *Georgia Stormwater Management Manual* (ARC, 2016) to facilitate water quality treatment of stormwater runoff, including bacteria removal, through structural stormwater BMP installation;
- Further develop and streamline mechanisms for reporting and correcting illicit discharges, breaks, surcharges, and general sanitary sewer system problems;
- Uphold requirements that all new and replacement sanitary sewage systems be designed to minimize discharges into storm sewer systems;
- Adoption of local ordinances (i.e., septic tanks, stormwater, etc.) that address local water quality;
- Continue efforts to increase public awareness and education regarding the impact of human activities on water quality, ranging from industrial and municipal discharges to individual's activities in residential neighborhoods;
- Continue working with Federal, State, and local agencies and owners of sites where cleanup measures are necessary, and in developing control measures to prevent future releases of constituents of concern;
- Implementation of recommended Water Quality management practices in the *Coastal Georgia Regional Water Plan* or the *Savannah-Upper Ogeechee Regional Water Plan* (GA EPD, 2017);
- Adoption of NRCS Conservation Practices for primarily agricultural lands;
- Application of BMPs appropriate to both urban and rural land uses, where applicable; and

- Ongoing public education efforts on the sources of bacteria and common-sense approaches to lessen the impact of this contaminant on surface waters.

7.4 Monitoring

GA EPD encourages local governments and municipalities to develop and continue water quality monitoring programs. These programs can help pinpoint various bacteria sources, as well as verify the 303(d) stream segment listings. This will be particularly valuable for those segments where listing was based on limited data. In addition, regularly scheduled sampling will determine if there has been some improvement in the water quality of the listed stream segments. GA EPD would like to particularly commend and encourage downgradient sampling on the LAS system and supports expanding monitoring to quarterly or monthly sampling schedules. GA EPD is available to assist in providing technical guidance regarding the preparation of monitoring plans and Sampling Quality Assurance Plans (SQAP).

7.5 Future Action

This Initial TMDL Implementation Plan includes a general approach to pollutant source identification, as well as management practices to address pollutants. In the future, GA EPD will continue to determine and assess the appropriate point and non-point source management measures needed to achieve the TMDLs and to protect and restore water quality in impaired waterbodies.

For point sources, any wasteload allocations for wastewater treatment plant facilities will be implemented in the form of water quality-based effluent limitations in NPDES permits. Any wasteload allocations for regulated stormwater will be implemented in the form of BMPs in the NPDES permits. Contributions of bacteria from regulated communities may also be managed using permit requirements such as watershed assessments, watershed protection plans, and long-term monitoring. These measures will be directed through current point source management programs.

GA EPD will work to support watershed restoration, improvement and protection projects that address nonpoint source pollution. This is a process whereby GA EPD and/or Regional Commissions or other agencies or local governments, under a contract with GA EPD, will develop a Watershed Management Plan intended to address water quality at the small watershed level (HUC 10 or smaller). These plans will be developed as resources and willing partners become available. The development of these plans may be funded via several grant sources, including, but not limited to: CWA Section 319(h), Section 604(b), and/or Section 106 grant funds. These plans are intended for implementation upon completion.

Any Watershed Management Plan that specifically addresses a waterbody contained within this TMDL will supersede this Initial TMDL Implementation Plan for that waterbody once GA EPD accepts and/or approves the plan. Watershed Management Plans intended to address this TMDL and other water quality concerns, prepared for GA EPD, and for which GA EPD and/or the GA EPD Contractor are responsible, will contain at a minimum the US EPA's 9 Elements of Watershed Planning:

- 1) An identification of the sources or groups of similar sources contributing to nonpoint source pollution to be controlled to implement load allocations or achieve water quality standards. Sources should be identified at the subcategory level with estimates of the extent to which they are present in the watershed (e.g., X numbers

of cattle feedlots needing upgrading, Y acres of row crops needing improved bacteria control, or Z linear miles of eroded streambank needing remediation);

- 2) An estimate of the load reductions expected for the management measures;
- 3) A description of the NPS management measures that will need to be implemented to achieve the load reductions established in the TMDL or to achieve water quality standards;
- 4) An estimate of the sources of funding needed, and/or authorities that will be relied upon, to implement the plan;
- 5) An information/education component that will be used to enhance public understanding of and participation in implementing the plan;
- 6) A schedule for implementing the management measures that is reasonably expeditious;
- 7) A description of interim, measurable milestones (e.g., amount of load reductions, improvement in biological or habitat parameters) for determining whether management measures or other control actions are being implemented;
- 8) A set of criteria that can be used to determine whether substantial progress is being made towards attaining water quality standards and, if not, the criteria for determining whether the plan needs to be revised; and;
- 9) A monitoring component to evaluate the effectiveness of the implementation efforts, measured against the criteria established under item 8.

The public will be provided an opportunity to participate in the development of Watershed Management Plans that address impaired waters and to comment on them before they are finalized.

GA EPD will continue to offer technical and financial assistance (when and where available) to complete Watershed Management Plans that address the impaired waterbodies listed in this and other TMDL documents. Assistance may include but will not be limited to:

- Assessments of pollutant sources within watersheds;
- Determinations of appropriate management practices to address impairments;
- Identification of potential stakeholders and other partners;
- Developing a plan for outreach to the public and other groups;
- Assessing the resources needed to implement the plan upon completion; and
- Other needs determined by the lead organization responsible for plan development.

GA EPD will also make this same assistance available, if needed, to proactively address water quality concerns. This assistance may be in the way of financial, technical, or other aid and may be requested and provided outside of the TMDL process or schedule.

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Appendix A

30-day Geometric Mean Fecal Coliform Monitoring Data

Table A-1: Drainage Areas and Annual Average flow values for segments with revised TMDLs

Revised TMDL Listed Stream Segment	Segment Location	Annual Average Stream Flow (ft ³ /s)	Watershed Area (sq miles)
Jackson Branch	Downstream King Finishing Company from SR17 to Ogeechee River, Dover	9.52	12.03
Jackson Branch	Upstream King Finishing Company from SR 17 to County Road 39, Dover	8.98	11.36

Table A-2: Drainage Areas and USGS Flow Gages used to Estimate Stream Flow in 303(d) Listed Streams

303(d) Listed Stream Segment	Segment Location	Impaired Stream Drainage Area (sq miles)	USGS Station ID	USGS Description	USGS Drainage Area (sq miles)
Buckhead Creek	Eightmile Creek to Rocky Creek	81.8	USGS 02198100	Beaverdam Creek near Sardis, GA	30.8
Ogeechee River	Spring Creek to Williamson Swamp Creek	981.3	USGS 02201230	Ogeechee River at Midville, GA	1,340
Ogeechee River	Long Branch to Nevills Creek	2063.7	USGS 02202040	Ogeechee River at Rocky Ford Rd, near Rocky Ford, GA	1,950
Tributary to Mill Creek	Unnamed tributary 0.3 miles upstream Sims Road to Mill Creek	11.4	USGS 02202600	Black Creek near Blythe, GA	232
Tributary to Salt Creek	Headwaters near Louis Mill Blvd (Savannah) to tributary 500 ft downstream Veterans Parkway	0.778			
Upper Black Creek	Crombly Pond to Lower Black Creek	87.93			

Table A-3: RV_02_17682: Buckhead Creek at Herndon Rd near Perkins, GA
Water Quality Monitoring Data

Date	Observed Fecal coliform (Count/100 mL)	Estimated Instantaneous Flow on Sample Day (cfs)	Geometric Mean (counts/100 mL)	Mean Flow (cfs)	Geometric Mean Fecal Coliform Loading (counts/30 days)	Geometric Mean TMDL Fecal Coliform Loading (counts/30 days)
03/10/2020	140	199.59	343	151.0	1.96E+12	
03/23/2020	1100	210.75				
03/30/2020	300	72.82				
04/02/2020	300	120.92				
06/11/2020	700	60.06	527	54.1	1.08E+12	4.10E+11
06/15/2020	170	13.90				
06/29/2020	130	9.94				
07/08/2020	5000	132.62				
09/01/2020	700	9.65	472	12.2	2.17E+11	9.22E+10
09/28/2020	500	11.59				
09/30/2020	300	15.28				
10/28/2020	360	10.66				
12/07/2020	1100	16.13	350	15.9	2.10E+11	
12/10/2020	300	14.38				
12/15/2020	130	17.14				

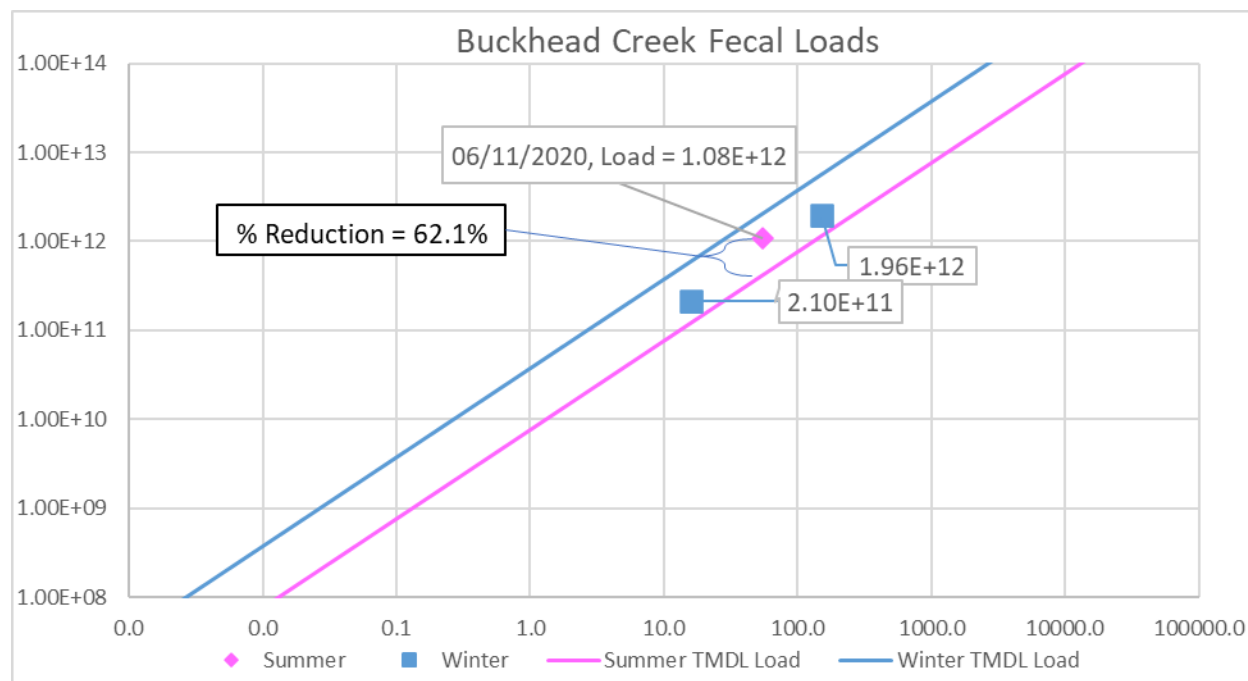


Figure A-1: Buckhead Creek Fecal Coliform Geometric Mean Loads and Summer and Winter TMDL Curves

**Table A-4: RV_02_286 – Ogeechee River at Georgia Highway 78 near Wadley, GA
Water Quality Monitoring Data**

Date	Observed Fecal coliform (Count/100 mL)	Estimated Instantaneous Flow on Sample Day (cfs)	Geometric Mean (counts/100 mL)	Mean Flow (cfs)	Geometric Mean Fecal Coliform Loading (counts/30 days)	Geometric Mean TMDL Fecal Coliform Loading (counts/30 days)
01/14/2019	10	1596.43	35	1796.0	2.36E+12	6.80E+13
01/28/2019	80	2599.69				
01/30/2019	45	1969.91				
02/05/2019	40	1017.91				
04/15/2019	80	1244.92	25	818.5	7.81E+11	3.10E+13
04/25/2019	20	776.25				
04/29/2019	10	434.26				
07/09/2019	40	164.04	141	118.5	6.35E+11	8.97E+11
07/22/2019	40	136.94	215	103.4	8.43E+11	7.83E+11
07/24/2019	500	114.24				
08/05/2019	500	58.95				
10/16/2019	500	76.89	156	1981.5	1.17E+13	1.50E+13
10/23/2019	170	372.74				
10/29/2019	130	207.98				

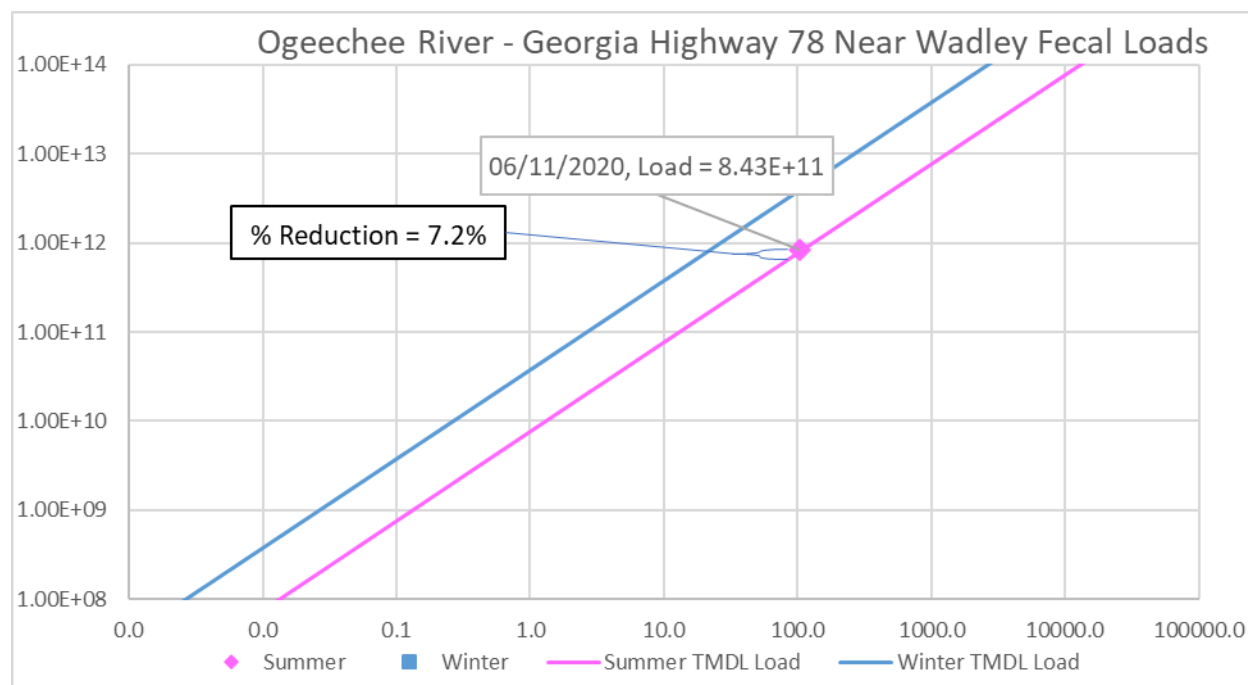


Figure A-2: Ogeechee River Fecal Coliform Geometric Mean Loads and Summer and Winter TMDL Curves

**Table A-5: RV_02_293 – Ogeechee River at Rocky Ford Road near Rocky Ford, GA
Water Quality Monitoring Data**

Date	Observed Fecal coliform (Count/100 mL)	Estimated Instantaneous Flow on Sample Day (cfs)	Geometric Mean (counts/100 mL)	Mean Flow (cfs)	Geometric Mean Fecal Coliform Loading (counts/30 days)	Geometric Mean TMDL Fecal Coliform Loading (counts/30 days)
01/14/2019	300	6116.90	117	4944.8	2.18E+13	1.87E+14
01/16/2019	20	4402.48				
01/30/2019	140	5725.34				
02/04/2019	220	3534.68				
04/15/2019	230	2285.90	113	1505.4	6.43E+12	5.70E+13
04/23/2019	80	1280.53				
04/25/2019	220	1195.87				
04/29/2019	40	1259.36				
07/22/2019	170	225.42	92	190.2	6.60E+11	1.44E+12
07/24/2019	80	223.30				
07/31/2019	40	182.03				
08/07/2019	130	130.17				
10/09/2019	500	83.71	536	203.2	4.13E+12	1.54E+12
10/16/2019	2400	111.12				
10/23/2019	300	249.76				
10/29/2019	230	368.28				
02/02/2021	110	3058.45	135	6974.1	3.56E+13	2.64E+14
02/04/2021	170	3174.86				
02/23/2021	160	16191.80				
03/01/2021	110	5471.35				
04/06/2021	130	2878.54	267	872.0	8.80E+12	6.60E+12
05/03/2021	230	1365.19				
05/05/2021	130	1164.12				
05/24/2021	130	639.21				
06/01/2021	1300	319.60				
08/05/2021	260	556.66				

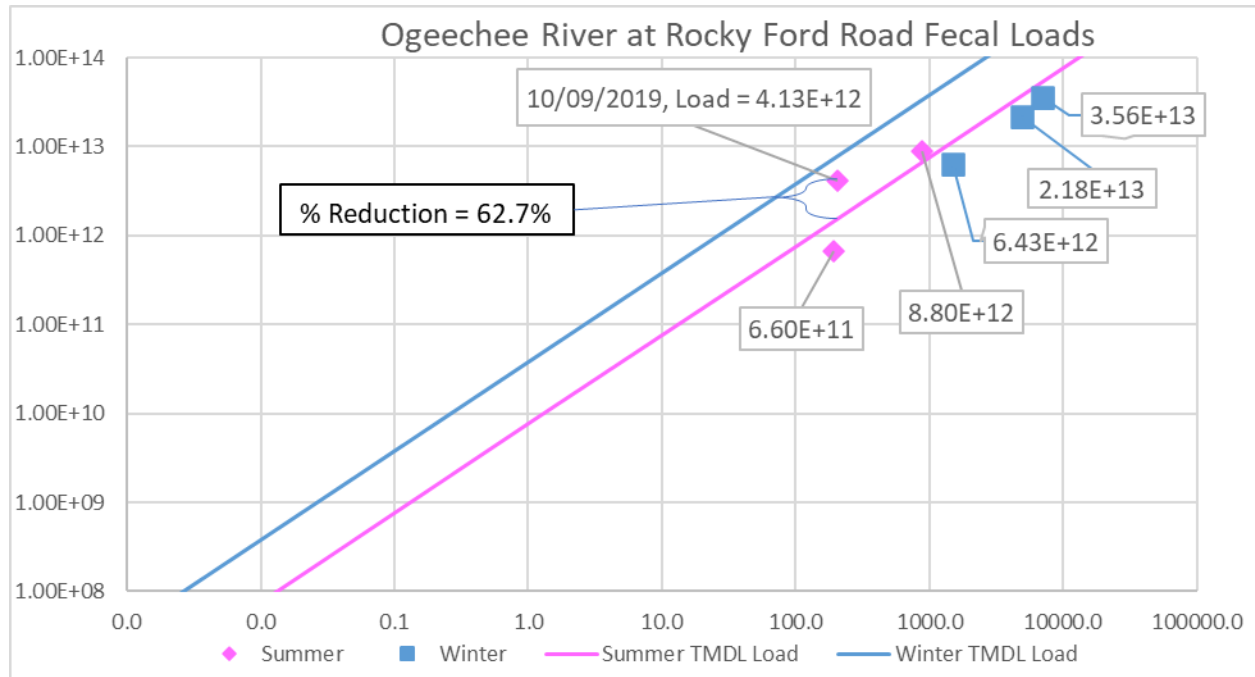


Figure A-3: Ogeechee River Fecal Coliform Geometric Mean Loads and Summer and Winter TMDL Curves for both Sampling Stations

**Table A-6: RV_02_304 – Upper Black Creek at CR582 (Arcola Rd)
Water Quality Monitoring Data**

Date	Observed Fecal coliform (Count/100 mL)	Estimated Instantaneous Flow on Sample Day (cfs)	Geometric Mean (counts/100 mL)	Mean Flow (cfs)	Geometric Mean Fecal Coliform Loading (counts/30 days)	Geometric Mean TMDL Fecal Coliform Loading (counts/30 days)
03/10/2020	20	477.55	40	144.1	2.20E+11	5.45E+12
03/23/2020	60	51.92				
03/30/2020	110	27.36				
04/02/2020	20	19.44				
06/11/2020	500	45.48	458	65.2	1.13E+12	4.93E+11
06/15/2020	800	201.25				
06/29/2020	220	7.96				
07/08/2020	500	5.95				
09/01/2020	170	6.33	249	14.6	1.38E+11	1.10E+11
09/28/2020	130	6.90				
09/30/2020	700	30.51				
12/10/2020	230	5.61				
12/15/2020	110	3.20				

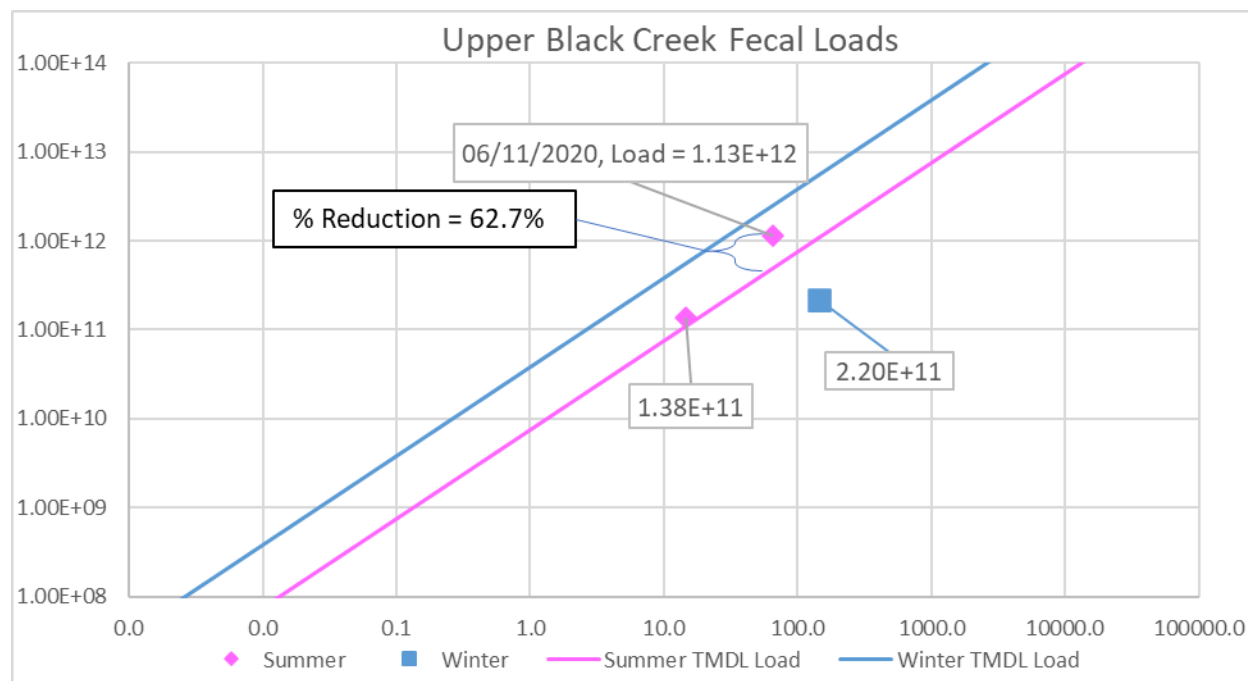


Figure A-4: Upper Black Creek Fecal Coliform Geometric Mean Loads and Summer and Winter TMDL Curves for both Sampling Stations

**Table A-7: RV_02_17761 – Unnamed Canal at Louis Mills Blvd near Savannah, GA
(Tributary to Salt Creek) Water Quality Monitoring Data**

Date	Observed Fecal coliform (Count/100 mL)	Estimated Instantaneous Flow on Sample Day (cfs)	Geometric Mean (counts/100 mL)	Mean Flow (cfs)	Geometric Mean Fecal Coliform Loading (counts/30 days)	Geometric Mean TMDL Fecal Coliform Loading (counts/30 days)
03/03/2021	8000	1.96	38	1.1	5.92E+11	2.96E+11
03/09/2021	40	2.29			1.56E+09	4.07E+10
03/16/2021	70	0.54				
04/05/2021	20	0.40	820	0.5	1.67E+10	4.07E+09
06/08/2021	300	0.35				
06/14/2021	8000	1.14				
06/28/2021	230	0.13				

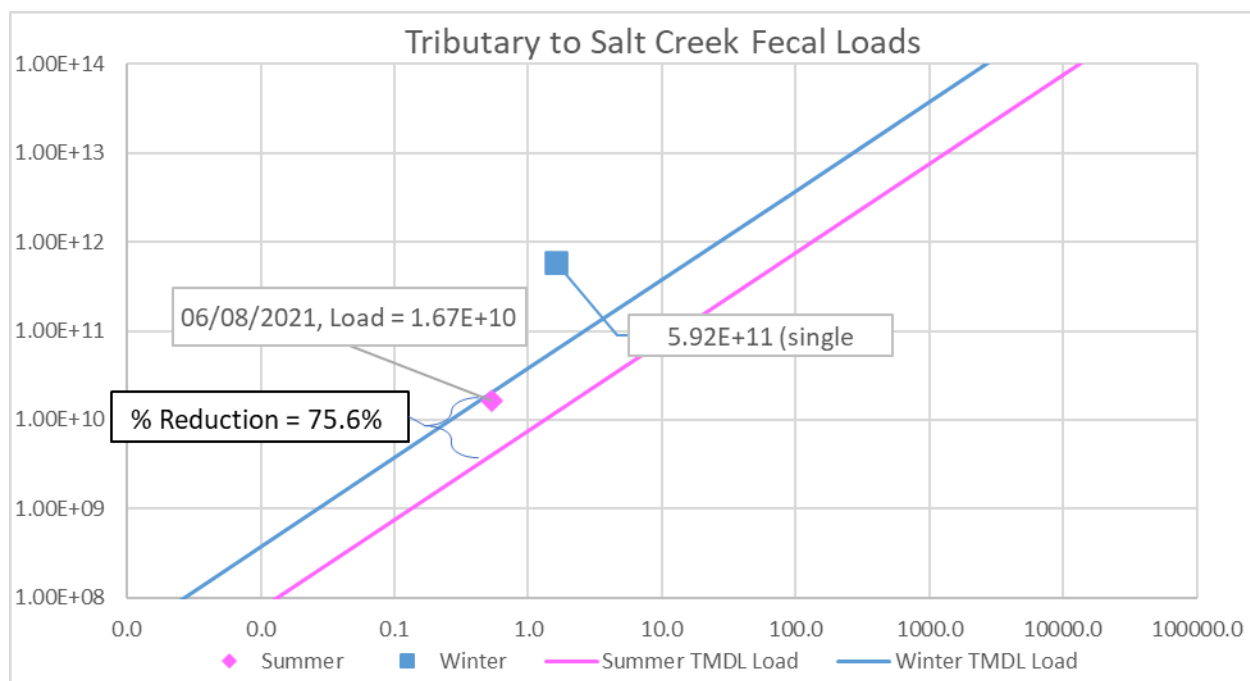


Figure A-5: Tributary to Salt Creek Fecal Coliform Geometric Mean Loads and Summer and Winter TMDL Curves for both Sampling Stations

**Table A-8: RV_02_485 – Tributary to Mill Creek at CC Road near Ellabell, GA,
Water Quality Monitoring Data**

Date	Observed Fecal coliform (Count/100 mL)	Estimated Instantaneous Flow on Sample Day (cfs)	Geometric Mean (counts/100 mL)	Mean Flow (cfs)	Geometric Mean Fecal Coliform Loading (counts/30 days)	Geometric Mean TMDL Fecal Coliform Loading (counts/30 days)
03/10/2020	130	61.67	248	18.6	1.74E+11	7.04E+11
03/23/2020	460	6.71				
03/30/2020	210	3.53				
04/02/2020	300	2.51				
06/11/2020	300	5.87	234	8.4	7.46E+10	6.37E+10
06/15/2020	500	25.99				
06/29/2020	40	1.03				
07/08/2020	500	0.77				
09/01/2020	130	0.82	405	1.9	2.88E+10	1.43E+10
09/28/2020	170	0.89	344	1.7	2.16E+10	1.25E+10
09/30/2020	3000	3.94				
10/28/2020	80	0.14				
12/10/2020	110	0.72				
12/15/2020	80	0.41				

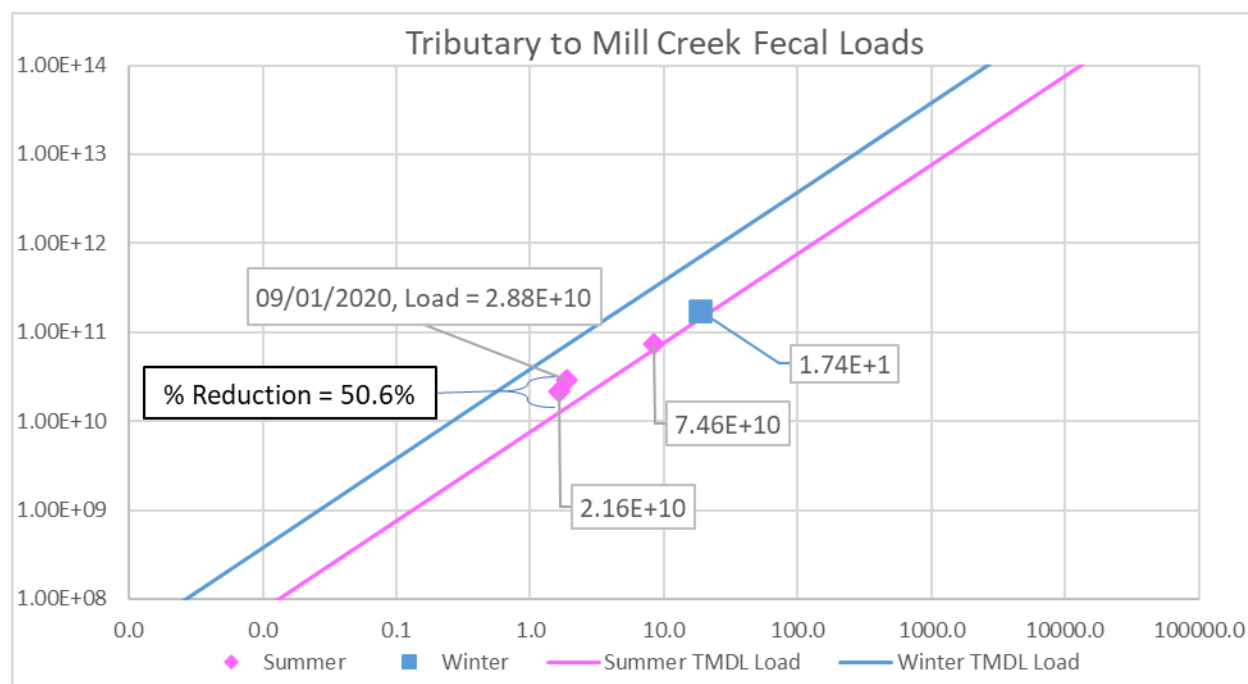


Figure A-6: Tributary to Mill Creek Fecal Coliform Geometric Mean Loads and Summer and Winter TMDL Curves for both Sampling Stations

Appendix B

30-day Geometric Mean *E. coli* Monitoring Data

Table B-1: RV_02_304: Upper Black Creek at CR 582 (Arcola Rd)
Water Quality Monitoring Data

Date	Observed Fecal coliform (Count/100 mL)	Estimated Instantaneous Flow on Sample Day (cfs)	Geometric Mean (counts/100 mL)	Mean Flow (cfs)	Geometric Mean Fecal Coliform Loading (counts/30 days)	Geometric Mean TMDL Fecal Coliform Loading (counts/30 days)
02/15/2022	500	35.48	75	29.3	8.34E+10	2.94E+11
02/21/2022	40	31.53				
02/23/2022	20	28.58				
03/02/2022	80	21.60				
05/16/2022	21	2.19	107	2.9	1.18E+10	1.39E+10
05/25/2022	290	0.88				
06/06/2022	200	5.65				
08/22/2022	690	10.92				
08/24/2022	490	25.89	549	41.3	8.59E+11	1.97E+11
09/06/2022	490	87.17				
11/15/2022	730	0.99	228	1.7	1.48E+10	9.96E+09
11/17/2022	180	0.81				
12/05/2022	220	2.45				
12/14/2022	93	2.59				

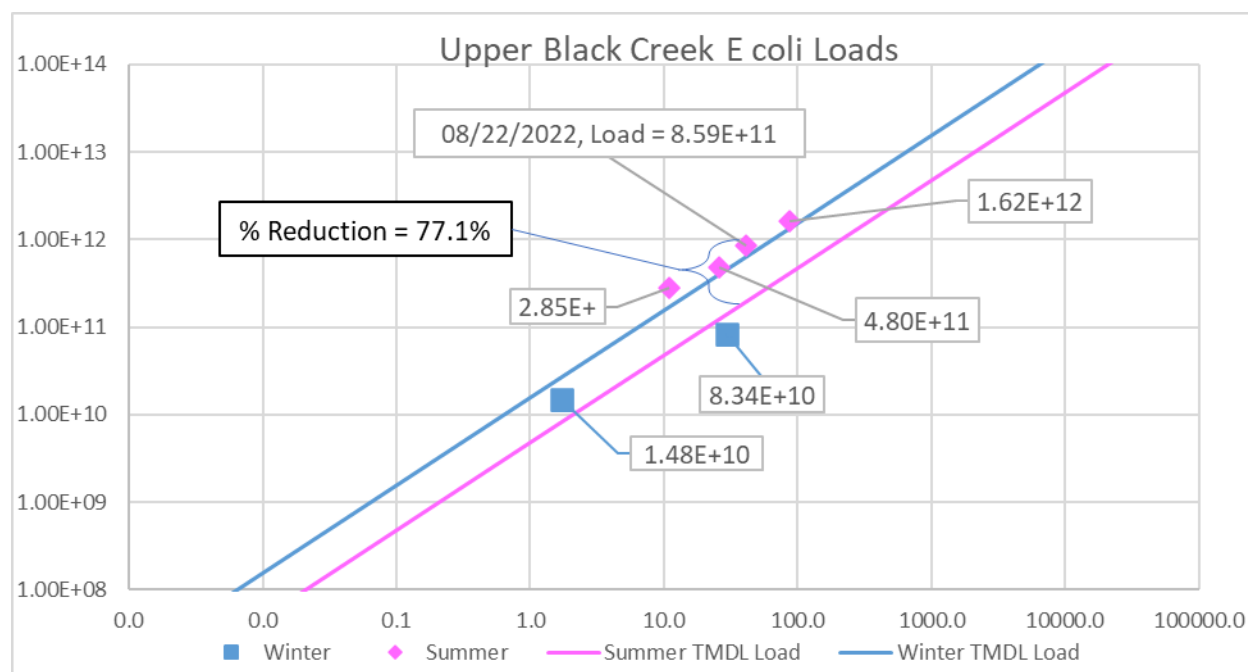


Figure B-1: Upper Black Creek Fecal Coliform Geometric Mean Loads and Summer and Winter TMDL Curves

Appendix C

30-Sample Shellfish Fecal Coliform Monitoring Data

Table C-1: SH_02_323: Bull River between Hwy 26 / Hwy 80 and Belz Creek
Water Quality Monitoring Data

Date	Observed Fecal coliform (Count/100 mL)	Geometric Mean (counts/100 mL)	Geometric Mean Criteria (counts/100 mL) and Percent Reduction	90 th Percentile (counts/100 mL)	90 th Percentile Criteria (counts/100 mL) and Percent Reduction
1/26/2021	33	15.76	14 (12.6%)	72.31	43 (68.2%)
2/23/2021	33				
3/16/2021	13				
4/27/2021	22				
5/18/2021	17				
6/29/2021	350				
7/28/2021	49				
12/16/2020	49				
11/23/2020	22				
10/27/2020	7.8				
9/29/2020	130				
8/25/2020	33				
7/28/2020	14				
6/10/2020	13				
5/28/2020	23				
3/11/2020	17				
2/26/2020	7.8				
1/29/2020	2				
12/16/2019	2				
11/25/2019	13				
10/30/2019	1.8				
9/25/2019	6.8				
8/27/2019	12				
7/23/2019	2				
6/25/2019	13				
5/22/2019	7.8				
4/16/2019	23				
3/25/2019	17				
2/20/2019	70				
1/24/2019	11				