# Draft

# Total Maximum Daily Load

# Evaluation

# for

# One Stream Segment

# in the

# Ogeechee River Basin

# for

# Enterococci

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

Submitted by:
The Georgia Department of Natural Resources
Environmental Protection Division
Atlanta, Georgia

April 2020

TMDL Action ID: **GAR4_20_02_05**

# Table of Contents

**Section** **Page**

EXECUTIVE SUMMARY ..... iv

1.0 INTRODUCTION ..... 1
1.1 Background ..... 1
1.2 Watershed Description ..... 1
1.3 State Water Planning ..... 2
1.4 Water Quality Standard ..... 2

2.0 WATER QUALITY ASSESSMENT ..... 9

3.0 SOURCE ASSESSMENT ..... 10
3.1 Point Source Assessment ..... 10
3.1.1 Wastewater Treatment Facilities ..... 10
3.1.2 Regulated Stormwater Discharges ..... 12
3.2 Nonpoint Source Assessment ..... 14
3.2.1 Wildlife ..... 14
3.2.2 Agricultural Livestock ..... 15
3.2.3 Urban Development ..... 15

4.0 ANALYTICAL APPROACH ..... 18
4.1 Mass Balance Approach ..... 18

5.0 TOTAL MAXIMUM DAILY LOAD ..... 20
5.1 Waste Load Allocations ..... 20
5.1.1 Wastewater Treatment Facilities ..... 20
5.1.2 Regulated Stormwater Discharges ..... 21
5.1.3 Concentrated Animal Feeding Operations ..... 22
5.2 Load Allocations ..... 22
5.3 Seasonal Variation ..... 23
5.4 Margin of Safety ..... 23
5.5 Total Enterococci Load ..... 23

6.0 RECOMMENDATIONS ..... 26
6.1 Monitoring ..... 26
6.2 Enterococci Management Practices ..... 26
6.2.1 Point Source Approaches ..... 27
6.2.2 Nonpoint Source Approaches ..... 27
6.3 Reasonable Assurance ..... 29
6.4 Public Participation ..... 29

7.0 INITIAL TMDL IMPLEMENTATION PLAN ..... 30
7.1 Impaired Segments ..... 30
7.2 Potential Sources ..... 30
7.3 Management Practices and Activities ..... 31
7.4 Monitoring ..... 32
7.5 Future Action ..... 32

REFERENCES ..... 34

## List of Tables

1. Stream Segments Listed on the 2018 303(d) List for Enterococci Bacteria in the Ogeechee River Basin
2. Ogeechee River Basin Land Coverage
3. Enterococci Sampling Stations and Dates – Ogeechee River Basin
4. NPDES Facility Discharging into or upstream of 303(d) Listed Stream Segments in the Ogeechee River Basin
5. Permitted MS4s in the Ogeechee River Basin Discharging to the Watershed of the 303(d) Listed Segment
6. Percentage of MS4 City or County Urbanized Area Upstream of 303(d) Listed Segment in the Ogeechee River Basin
7. Estimated Agricultural Livestock Populations in Counties Containing the 303(d) Listed Segment Watershed in the Ogeechee River Basin
8. Estimated Number of Septic Systems in Counties Containing the Watershed of the 303(d) Listed Segment in the Ogeechee River Basin
9. Permitted Land Application Systems in the Vicinity of 303(d) Listed Segments in the Ogeechee River Basin
10. Landfills in the Vicinity of 303(d) Listed Segments in the Ogeechee River Basin
11. WLAs for the Ogeechee River Basin
12. Enterococci Loads and Required Enterococci Load Reductions

## List of Figures

1. Ogeechee River Basin and the River Basins of Georgia
2. Major Political Boundaries, Water Features, and U.S.G.S. 8-digit HUC Watersheds within the Ogeechee River Basin
3. Impaired Stream Segment in Ogeechee River Basin
4. Boundaries of the Regional Water Planning Councils and the Metropolitan North Georgia Water Planning District

## List of Appendices

A. Enterococci Monitoring Data

# EXECUTIVE SUMMARY

The State of Georgia assesses its waterbodies for compliance with water quality standards 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 2018 305(b) list as required by that section of the CWA that defines the assessment process and are published in *Water Quality in Georgia 2016-2017* (GA EPD, 2018). This document is available on the Georgia Environmental Protection Division (GA EPD) website.

The subset of the water bodies 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 2016-2017* (GA EPD, 2018). Water bodies 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 2018 305(b)/303(d) list. The TMDL process establishes the allowable pollutant loadings or other quantifiable parameters for a water body 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. The State of Georgia has placed a stream segment in the Ogeechee River Basin on the 303(d) list of impaired waters because it was assessed as "not supporting" the designated use of "Recreation" due to violation of the enterococci water quality criteria. The water quality criteria for enterococci bacteria for a coastal water with a designated use of recreation are as follows:

> Culturable enterococci not to exceed a geometric mean of 35 CFU (colony forming units) per 100 mL. The geometric mean duration shall not be greater than 30 days. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 130 CFU per 100 mL the same 30-day interval.

Waterbodies in Georgia are assessed based on the 305(b)/303(d) Listing Assessment Methodology included in Appendix A of *Water Quality in Georgia 2016-2017*. A waterbody is assessed as "not supporting" its use if more than 10% of the geometric means exceeded the water quality criteria cited above. If no geometric means are available, a water is assessed as "not supporting" its use if more than 10 percent of individual samples exceed the enterococci STV criteria.

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 bacteria that wash off land surfaces as a result of storm events.

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

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

The listed water body is tidal in nature, and as such, the flow continuously varies, in both volume and direction. Therefore, enterococci daily loads are represented by the variable flow (Q) times the measured enterococci concentration, or in the case of the TMDL, the appropriate enterococci criteria. The enterococci load and required reduction for the listed streams are summarized in the table below.

Management practices that should be used to help reduce enterococci source loads include:

- Compliance with NPDES (wastewater, construction, industrial stormwater, and/or MS4) permit limits and requirements;
- Implementation of recommended Water Quality management practices in the *Coastal Georgia Regional Water Plan* (GA EPD, 2017);
- Implementation of *Georgia's Best Management Practices for Forestry* (GFC, 2009);
- Implementation of *Best Management Practices for Georgia Agriculture* (GSWCC, 2013) and Adoption of National Resource Conservation Service (NRCS) Conservation Practices for agriculture;
- Implementation of 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.

The amount of enterococci bacteria delivered to a stream is difficult to determine. However, the use of these management practices should improve stream water quality, and future monitoring will provide a measurement of TMDL implementation.

## Enterococci Loads and Required Enterococci Load Reductions

| Stream Segment | Description | Bacterial Indicator | Current Load (counts/ 30 days) | TMDL Components | | | | | Percent Reduction Required |
|---|---|---|---|---|---|---|---|---|---|
| | | | | WLA (counts/ 30 days)[1] | WLAsw (counts/ 30 days) | LA (counts/ 30 days) | MOS (counts/ 30 days) | TMDL (counts/ 30 days) | |
| Little Ogeechee River (aka Green Island Sound) [GAR030602040317] | Vernon River to Ossabaw Sound | Enterococci | 2,420 x $Q_{Total}$ (2) | 9.54E10 | 35 x $Q_{WLASW}$ (2) | 35 x $Q_{LA}$ (2) | 3.5 x $Q_{Total}$ (2) | 35 x $Q_{Total}$ (2) | (3) |

Notes:

(1) The assigned enterococci load from the NPDES permitted facilities for WLA was determined as the product of the enterococci 30-day water quality criteria (35 counts/100mL) and the facility average monthly discharge at the time of the critical load.

(2) The impaired segment of the Little Ogeechee River is tidal in nature. Therefore, the current load, load allocations, and TMDL are expressed as a function of the flow Q at any given time

(3) Percent reduction could not be determined due to absence of a discrete current load calculation

# 1.0 INTRODUCTION

## 1.1 Background

The State of Georgia assesses its waterbodies for compliance with water quality standards 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 2018 305(b) list as required by that section of the CWA that defines the assessment process and are published in *Water Quality in Georgia 2016-2017* (GA EPD, 2018). This document is available on the Georgia Environmental Protection Division (GA EPD) website.

The subset of the water bodies 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 2016-2017* (GA EPD, 2018). Water bodies 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 2018 305(b)/303(d) list. The TMDL process establishes the allowable pollutant loadings or other quantifiable parameters for a water body 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 their designated use classifications due to exceedances of water quality standards for enterococci bacteria. Enterococci bacteria are used as an indicator of the potential presence of pathogens in a stream. Table 1 presents one stream in the Ogeechee River Basin included on the 2018 303(d) list for exceedances of the enterococci standard criteria.

**Table 1. Stream Segment Listed on the 2018 303(d) List for Enterococci in the Ogeechee River Basin**

| Stream Segment | Location | Reach ID | Segment Length (miles) | Designated Use |
|---|---|---|---|---|
| **Little Ogeechee River (aka Green Island Sound)** | Vernon River to Ossabaw Sound | GAR030602040317 | 1 | Recreation |

## 1.2 Watershed Description

The Ogeechee River Basin is located in southeast Georgia, occupying an area of approximately 5,540 square miles. 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 and the other River Basins in Georgia, and Figure 2 shows the major political boundaries, water features, and U.S.G.S 8-digit HU watersheds within the Ogeechee River Basin. Figure 3 shows the locations of the impaired waterbody and its representative watershed within 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, and 2008. The raster data sets were developed from Landsat Thematic Mapper (TM) and Enhanced Thematic Mapper Plus (ETM+). Some of the NARSAL land use types were reclassified, aggregated into similar land use types, and used in the final watershed characterization. Table 2 lists the watershed land use distribution for the drainage areas of the two impaired 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. Figure 4 shows the boundaries of the RWPCs and the MNGWPD. The listed waterbody is located within the boundaries of the Coastal Georgia Water Planning Region.

In 2011, each RWPC finished development of individualized Regional Water Plans, which were later adopted following GA EPD review. These Regional Water Plans (RWP) identify a range of actions or management practices to help meet the state's water quality and water supply challenges. The MNGWPD and each RWPC subsequently updated and revised their respective management plan documents in 2017. Implementation of these RWPs is critical to meeting Georgia's water resource challenges. The RWPs appropriate to this TMDL are discussed in Sections 6 and 7.

### 1.4 Water Quality Standard

The water use classification for the listed stream segment in the Ogeechee River Basin is Recreation. The criterion violated is listed as enterococci. The potential causes listed include urban runoff, nonpoint sources, and municipal facilities. The use classification water quality

standards for enterococci bacteria, as stated in the *State of Georgia's Rules and Regulations for Water Quality Control*, Chapter 391-3-6-.03(6)(b)(i)(1) (GA EPD, 2015), are:

(b) Recreation: General recreational activities such as water skiing, boating, and swimming, or for any other use requiring water of a lower quality, such as recreational fishing. These criteria are not to be interpreted as encouraging water contact sports in proximity to sewage or industrial waste discharges regardless of treatment requirements:

(i)(1) Bacteria in coastal waters: Culturable enterococci not to exceed a geometric mean of 35 CFU per 100 mL. The geometric mean duration shall not be greater than 30 days. There shall be no greater than a ten percent excursion frequency of an enterococci statistical threshold value (STV) of 130 CFU per 100 mL in the same 30-day interval.

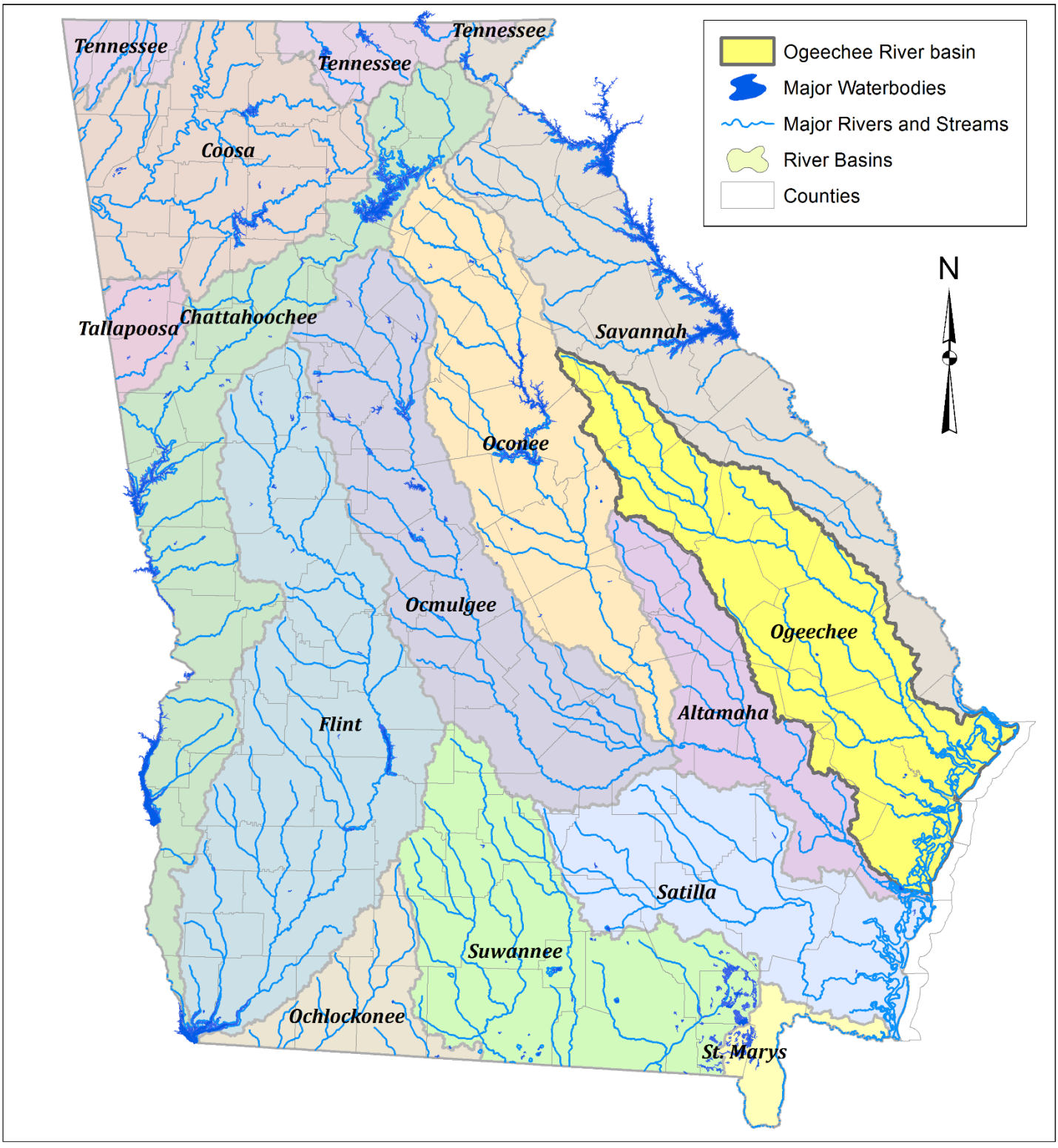


**Figure 1. Ogeechee River Basin and the River Basins of Georgia**

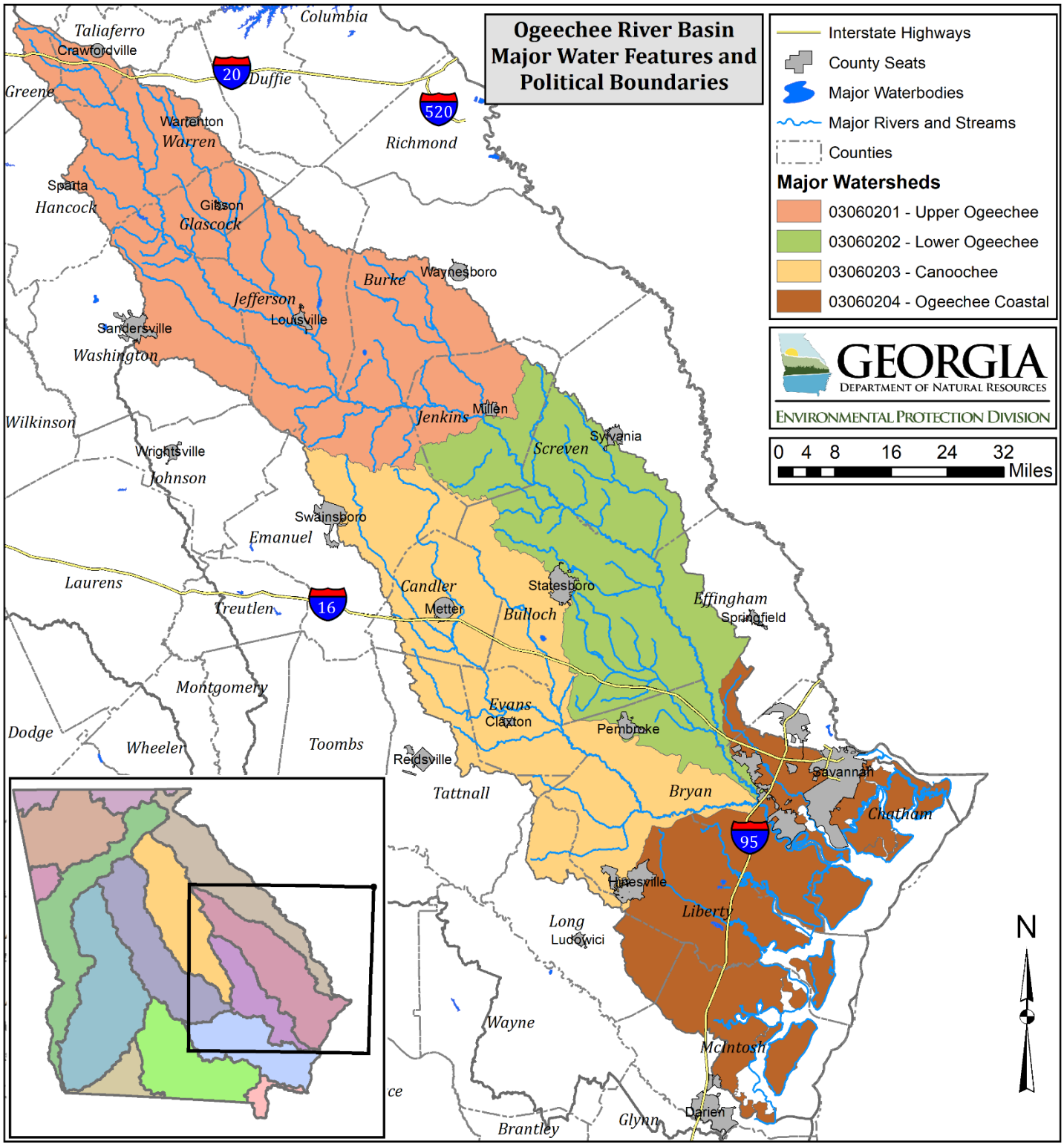


**Figure 2. Major Political Boundaries, Water Features, and U.S.G.S. 8-digit HUC Watersheds within the Ogeechee River Basin**

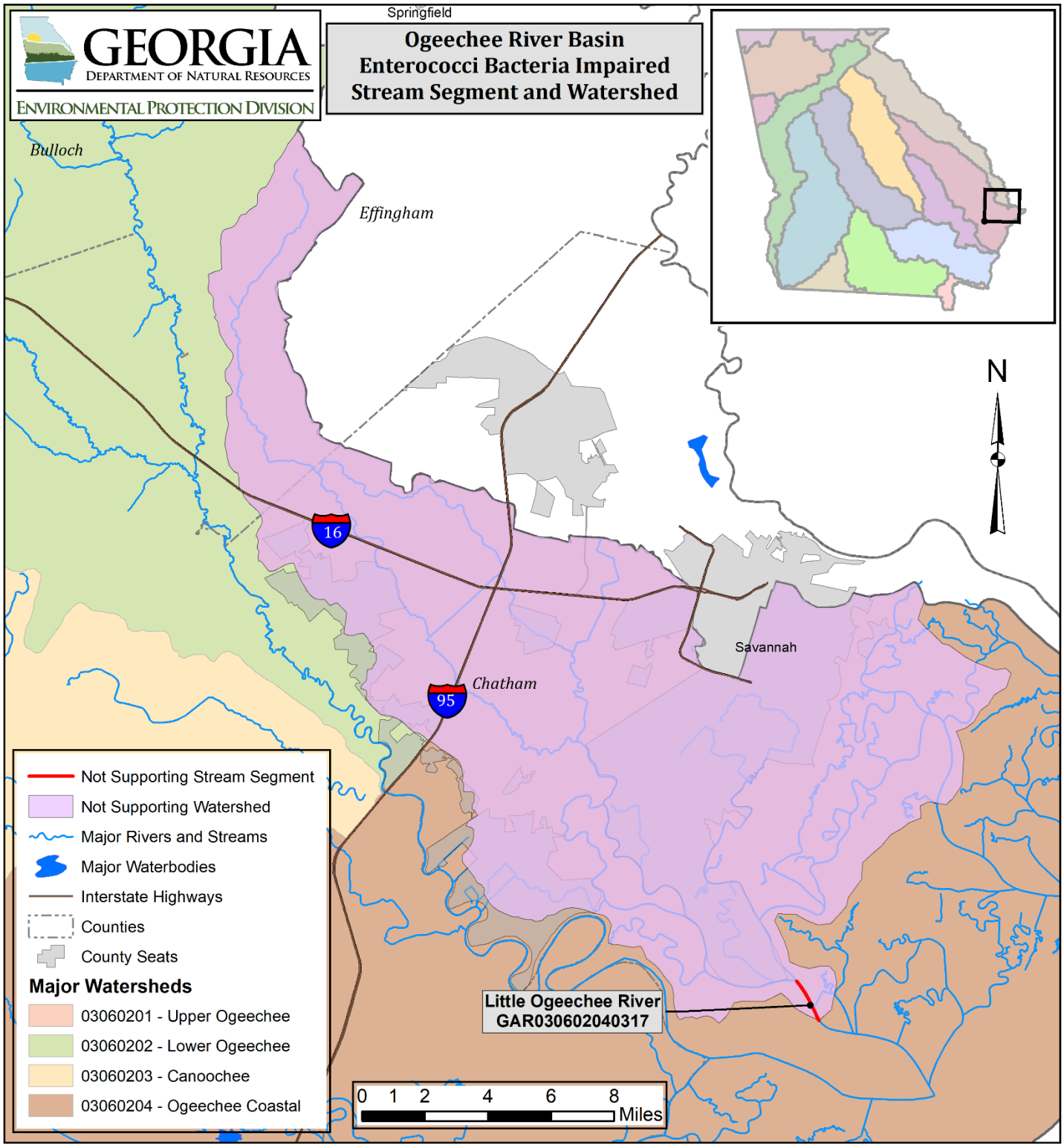


**Figure 3. Impaired Stream Segment in Ogeechee River Basin**

## Table 2. Ogeechee River Basin Land Coverage

| Stream/Segment | Land Use Categories - Acres (Percent) | | | | | | | | | | | | | | | | | | | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Open Water | Utility Swaths | Golf Courses | Developed, Open Space | Developed, Low Intensity | Developed, Medium Intensity | Developed, High Intensity | Clearcut Sparse | Beaches/Dunes/Mud | Quarries, Strip Mines | Rock Outcrop | Deciduous Forest | Evergreen Forest | Mixed Forest | Pasture | Row Crop | Forested Wetlands | Non-Forested Wetlands (salt/brackish) | Non-Forested Wetlands (Freshwater) | |
| **Little Ogeechee River (aka Green Island Sound) [GAR030602040317]** | 11754 | 550 | 835 | 11515 | 9921 | 7850 | 6776 | 5032 | 379 | 142 | 0 | 4253 | 17662 | 2172 | 5587 | 480 | 36883 | 25698 | 5607 | 153,095 |
| | 7.68% | 0.36% | 0.55% | 7.5% | 6.5% | 5.1% | 4.4% | 3.3% | 0.25% | 0.10% | 0 | 2.8% | 11.5% | 1.4% | 3.65% | 0.31% | 24.1% | 16.8% | 3.66% | 100.0% |

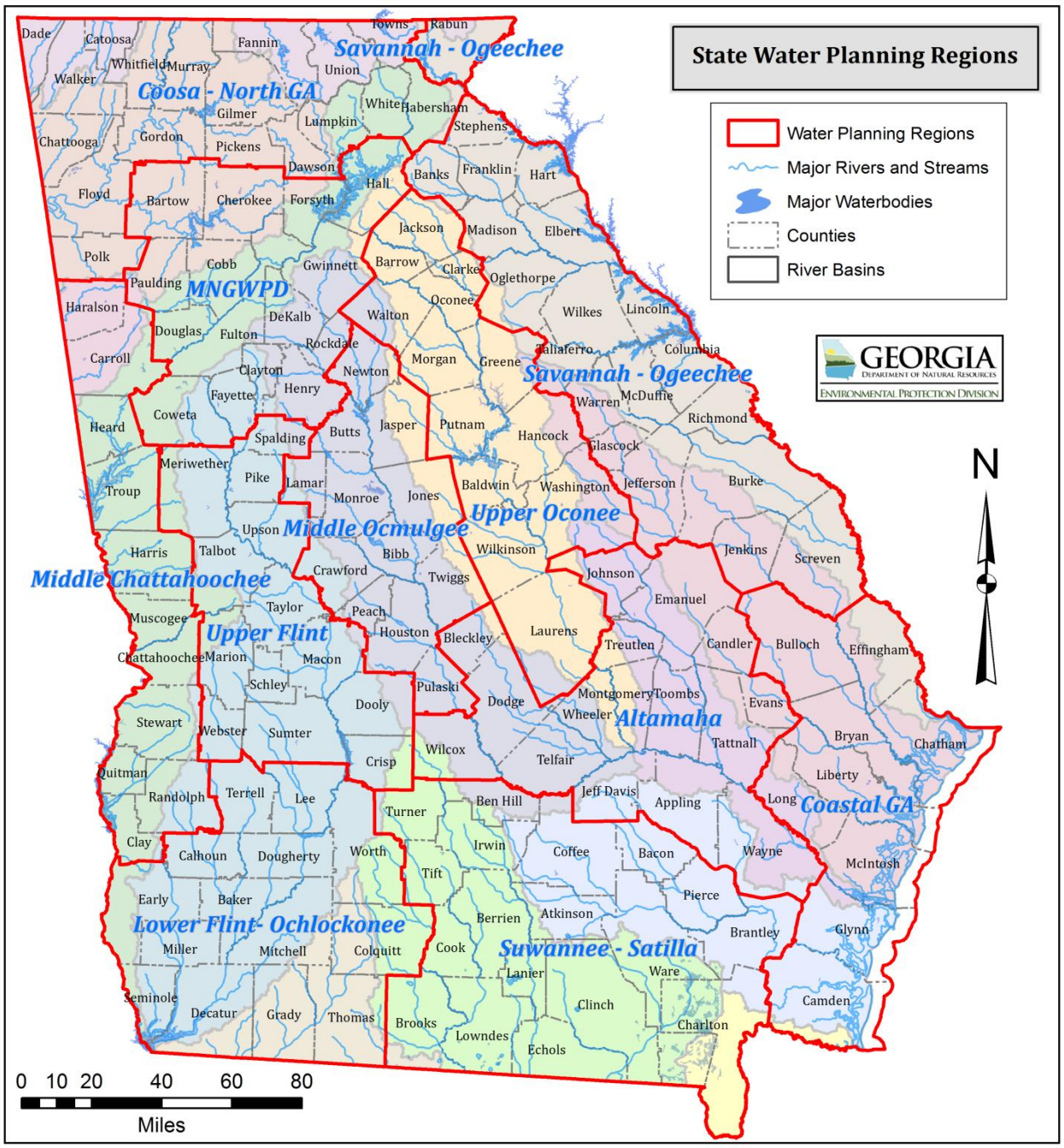


**Figure 4. Boundaries of the Regional Water Planning Councils and the Metropolitan North Georgia Water Planning District**

# 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. A stream is placed on this list if more than 10% of the calculated geometric means exceed the enterococci criteria. If sampling data do not allow for the calculation of 30-day geometric means, a stream is placed on the list if more than 10% of the individual samples exceed the Statistical Threshold Value criteria. Water quality samples collected within a 30-day period that have a geometric mean in excess of 35 counts per 100 milliliters are in violation of the bacteria water quality standard. There is also an individual sample statistical threshold value of 130 counts per 100 milliliters.

Enterococci data used for the TMDL developed in this document were collected during calendar years 2015 through 2016 by GA EPD staff. A summary of sampling station locations and sampling dates are given in Table 3. These data are presented in Appendix A.

**Table 3. Enterococci Sampling Stations and Dates – Ogeechee River Basin**

| Stream Segment | Location | GA EPD Monitoring Station No. | Monitoring Station Coordinates | Monitoring Station Description | Sample Date Range |
|---|---|---|---|---|---|
| Little Ogeechee River (aka Green Island Sound) | Vernon River to Ossabaw Sound | SH_02_317 (0204030402) | 31.88823, -81.08798 | Little Ogeechee River at Green Island | 2015-2016 |

# 3.0 SOURCE ASSESSMENT

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 accumulation of enterococci bacteria on land surfaces that wash off as a result of storm events.

## 3.1 Point Source Assessment

Title IV of the Clean Water Act establishes the National Pollutant Discharge Elimination System (NPDES) permit program. There are two basic kinds of NPDES permits: 1) municipal and industrial wastewater treatment facilities, and 2) regulated stormwater discharges.

### 3.1.1 Wastewater Treatment Facilities

In general, municipal and industrial wastewater treatment facilities have NPDES permits with effluent limits. These permit limits are either based on federal and state effluent guidelines (technology-based limits) or on water quality standards (water quality-based limits).

The United States Environmental Protection Agency (USEPA) has developed technology-based guidelines, which establish a minimum standard of pollution control for municipal and industrial discharges without regard for the quality of the receiving waters. These are based on Best Practical Control Technology Currently Available (BPT), Best Conventional Control Technology (BCT), and Best Available Technology Economically Achievable (BAT). The level of control required by each facility depends on the type of discharge and the pollutant.

The USEPA and the states have also developed numeric and narrative water quality standards. Typically, these standards are based on the results of aquatic toxicity tests and/or human health criteria and include a margin of safety. Water quality-based effluent limits are set to protect the receiving stream. These limits are based on water quality standards that have been established for a stream based on its intended use and the prescribed biological and chemical conditions that must be met to sustain that use.

Discharges from municipal and industrial wastewater treatment facilities can contribute enterococci to receiving waters. There are two NPDES permitted discharges with flow greater than 0.1 million gallons per day (MGD) identified in the Ogeechee River Basin that could potentially impact streams on the 2018 303(d) list for enterococci bacteria. Table 4 provides the monthly average discharge flow and enterococci concentrations for these facilities, if available. This data was obtained from calendar years 2016 Discharge Monitoring Reports (DMR).

Combined sewer systems convey a mixture of raw sewage and stormwater in the same conveyance structure to the wastewater treatment plant. These are considered a component of municipal wastewater treatment facilities. 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.

**Table 4. NPDES Facility Discharging into or upstream of 303(d) Listed Stream Segments in the Ogeechee River Basin**

| Facility Name | NPDES Permit No. | Receiving Stream | 303(d) Listed Segment | Actual 2016 Discharge | | NPDES Permit Limits | | Number of Enterococci Violations[3] 2016 |
|---|---|---|---|---|---|---|---|---|
| | | | | Average Monthly Flow (MGD)[1] | Average Monthly Enterococci (No./100mL)[2] | Average Monthly Flow (MGD) | Average Monthly Enterococci (No./100mL) | |
| City of Savannah (Georgetown WPCP) | GA0046418 | Ogeechee River | Little Ogeechee River (aka Green Island Sound) | 1.77 | 1.17 | 2.45 | 35 | 0 |
| Consolidated Utilities (Larchmont WPCP) | GA0034819 | Little Ogeechee River | Little Ogeechee River (aka Green Island Sound) | 0.66 | n/a[4] | 2015 – 0.65<br>2016 – 1.0 | n/a[4] | n/a[4] |

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

Notes:

1 - Values shown are the annual average of the monthly average flows.
2 - Values shown are the annual average of the monthly geometric means.
3 - Both monthly and weekly violations included.
4 - Facility NPDES permit only contained Fecal Coliform limits at the time of in-stream water quality violations

### 3.1.2 Regulated Stormwater Discharges

Some stormwater runoff is covered under the NPDES Permit Program as a point source. Some industrial facilities included under the program will have limits similar to traditional NPDES-permitted dischargers, whereas others establish controls to limit pollution: "to the maximum extent practicable" (MEP). Currently, regulated stormwater discharges that may contain enterococci bacteria consist of those associated with industrial activities and large, medium, and small municipal separate storm sewer systems (MS4s) that serve populations of 50,000 or more.

#### 3.1.2.1 Industrial General Stormwater NPDES Permit

Stormwater discharges associated with industrial activities are currently covered under the 2012 General Storm Water NPDES Permit (GAR050000), also called the Industrial General Permit (IGP). This permit requires visual monitoring of stormwater discharges, site inspections, implementation of Best Management Practices (BMPs), and record keeping. The IGP establishes requirements for stormwater discharged to a 305(b)/303(d)-listed stream segment identified as "not supporting" its designated use(s). Stormwater discharging into, or within one linear mile upstream of and within the same watershed as, a listed segment must satisfy the requirements of Appendix C of the 2012 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.

#### 3.1.2.2 MS4 NPDES Permits

Stormwater discharges from MS4s are very diverse in pollutant loadings and frequency of discharge. At present, all cities and counties within the state of Georgia that had a population of greater than 100,000 at the time of the 1990 Census are permitted for their stormwater discharge under Phase I. This includes 58 permittees in Georgia.

Phase I MS4 permits require 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 Stormwater Management Plan (SWMP) outlining appropriate controls is required by and referenced in the permit. The Phase I MS4s in the Ogeechee River Basin are given in Table 5 below.

Small MS4s serving urbanized areas are required to obtain a stormwater permit under the Phase II stormwater regulations. The urbanized areas are defined by the U.S. Census Bureau. Thirty-five counties, 73 cities, 5 Department of Defense facilities, and the Georgia Department of Transportation (DOT) are permitted under the Phase II regulations in Georgia. In addition to the DOT, which is located in all river basins, there are Phase II MS4s in the Ogeechee River Basin given in Table 5.

**Table 5. Permitted MS4s in the Ogeechee River Basin Discharging to the Watershed of the 303(d) Listed Segment**

| Stream Segment | MS4 Permittee | Permit Number | Permit Phase |
|---|---|---|---|
| **Little Ogeechee River (aka Green Island Sound)** | Hunter Army Airfield | GAG480004 | 2 |
| | Chatham County | GAS000206 | 1 |
| | City of Savannah | GAS000205 | 1 |
| | City of Pooler | GAS000209 | 1 |
| | City of Bloomingdale | GAS000207 | 1 |
| | Garden City | GAS000208 | 1 |
| | Town of Thunderbolt | GAS000211 | 1 |
| | Effingham County | GAG610032 | 2 |

Source: Nonpoint Source Program, GA EPD, 2017

Table 6 lists the MS4 city or county urbanized areas upstream of the listed segment in the Ogeechee River Basin. Urbanized areas include land uses identified as lawns, parks, and greenspace, as well as residential, commercial, industrial, and transportation facilities. The table provides the total area of this watershed and the percentage of the watershed that is a MS4 city or county urbanized area.

**Table 6. Percentage of MS4 City or County Urbanized Area Upstream of 303(d) Listed Segment in the Ogeechee River Basin**

| 303(d) Listed Stream Segment | Location | Total Area (square miles) | % In MS4 Urbanized Area |
|---|---|---|---|
| **Little Ogeechee River (aka Green Island Sound)** | Vernon River to Ossabaw Sound | 239.21 | 35.6% |

### 3.1.3 Concentrated Animal Feeding Operations

Under the Clean Water Act, Concentrated Animal Feeding Operations (CAFOs) are defined as point sources of pollution and are therefore subject to NPDES permit regulations. 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 will continue LAS permitting of medium size liquid manure AFOs and extend LAS permitting to large liquid manure AFOs with more than 1,000 AU, unless they elect to obtain an NPDES permit. There are no known liquid manure CAFOs located in the vicinity of the listed segments in the Ogeechee River Basin that have

NPDES or land application permits.

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. The majority of 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 enterococci. However, land-applied litter that was previously stored for an extended length of time typically exhibits very low enterococci levels. There are no known dry manure poultry operations located in the vicinity of the listed segments in the Ogeechee River Basin.

## 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 enterococci 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 enterococci 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 enterococci 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 abundant throughout the Ogeechee River Basin. Enterococci 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 enterococci to streams during runoff events. Between storm events, considerable decomposition of the fecal matter might occur, resulting in a decrease in the associated enterococci numbers.

### 3.2.2 Agricultural Livestock

Agricultural livestock are a potential source of enterococci 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 enterococci loading rates throughout the year. Beef cattle spend all of 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).

Table 7 provides the estimated number of beef cattle, dairy cattle, goats, horses, swine, sheep, and chickens reported by county.

**Table 7. 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 | | |
| | | | | | | | Layers | Breeders | Broilers |
| Chatham | 84 | NA | NA | NA | 112 | 175 | 630 | NA | NA |
| Effingham | 1,056 | 14 | 72 | 68 | 465 | 880 | 2,416 | 393 | 610 |

Source: Center for Agribusiness and Economic Development, UGA 2015

### 3.2.3 Urban Development

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

Urban runoff can contain high concentrations of enterococci from domestic animals and urban wildlife. Enterococci bacteria enter streams by direct washoff 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 50,000), 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 enterococci, 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. Enterococci 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 enterococci contributions in the Ogeechee River Basin may be attributed to failure of septic systems and illicit discharges of raw sewage. Table 8 presents the number of septic systems in each county of the Ogeechee River Basin existing at the end of 2009 and the number existing at the end of 2013. This is 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 2009 through 2013 is given. These data show an increase in the number of septic systems in all of the counties. Often, this reflects population increases outpacing the expansion of sewage collection systems.

**Table 8. Estimated Number of Septic Systems in Counties Containing the Watershed of the 303(d) Listed Segment in the Ogeechee River Basin**

| County | Existing Septic Systems (2007) | Septic Systems Installed to Date (2017) | Number of Septic Systems Installed (2007 to 2017) | Number of Septic Systems Repaired (2007 to 2017) |
|---|---|---|---|---|
| Chatham | 14,619 | 15,025 | 406 | 283 |
| Effingham | 16,503 | 18,207 | 1,704 | 647 |

Source: The Georgia Dept. of Public Health, Environmental Health Section, 2016

### 3.2.3.2 Land Application Systems

Some communities and industries use land application systems (LAS) for wastewater disposal. These facilities are required through 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 enterococci bacteria to nearby surface waters. Runoff of stormwater might also carry surface residual containing enterococci bacteria. There is one permitted LAS system with a flow greater than 0.1 MGD identified in the Ogeechee River Basin that could potentially impact the stream segments in this TMDL (Table 9).

**Table 9. Permitted Land Application Systems Upstream of 303(d) Listed Segments in the Ogeechee River Basin**

| LAS Name | 303(d) Listed Stream Segment | County | Permit No. | Type | Flow (MGD) |
|---|---|---|---|---|---|
| Skidaway Island Utilities | Little Ogeechee River (aka Green Island Sound) | Chatham | GAJ030941 | PID | 1.25 |

Source: Permitting Compliance and Enforcement Program, EPD, Atlanta, Georgia, 2019

### 3.2.3.3 Landfills

Leachate from landfills may contain enterococci bacteria that could at some point reach surface waters. Sanitary (or municipal) landfills are the most likely to serve as a source of enterococci 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. There are 73 known landfills in the Ogeechee River Basin. Of these, 6 are active landfills and 67 are inactive or closed. Table 10 below presents the landfills in the vicinity of the 303(d) listed stream segments.

## Table 10. Landfills Upstream of 303(d) Listed Water Bodies in the Ogeechee River Basin

| Name | County | Landfill Type | Permit No. | Status |
|---|---|---|---|---|
| **Little Ogeechee River** | | | | |
| Bush Road inert Landfill | Chatham | Inert | APL 0257 | Applied for |
| Savannah – Bacon Park (L) | Chatham | L | 025-010D(L) | Closed |
| Chatham Co - Chevis Rd (L) | Chatham | L | 025-038D(L) | Closed |
| Chatham Co - I 16 Bloomingdale | Chatham | L | 025-040D(L) | Closed |
| Chatham Co-Thomas Ave (L) | Chatham | L | 025-056D(L) | Closed |
| Chatham Co - Sharon Park (L) | Chatham | L | 025-057D(L) | Closed |
| Carter - Quacco Rd (L) | Chatham | L | 025-063D(L) | Archived |
| Macmillian - Dean Forest Rd (L) | Chatham | L | 025-066D(L) | Closed |
| Crosby - Quacco Rd (L) | Chatham | L | 025-068D(L) | Released |
| Waste Mgt of Savannah (Metro Waste) (LI) | Chatham | LI | 025-016D(LI) | Closed |
| International Paper - Blmgdale/Elkins Cmtry (LI) | Chatham | LI | 025-041D(LI) | Operating |
| International Paper-Carter Adams Cell #4 | Chatham | LI | 025-041D(LI)(4) | Operating |
| Garrett-Kelly Hill Rd (LI) | Chatham | LI | 025-053D(LI) | In-Closure |
| Clay - Ric US 80 (LI) | Chatham | LI | 025-065D(LI) | Closed |
| Savannah-Dean Forest Rd (SL) | Chatham | MSWL | 025-051D(SL) | Operating |
| Superior Landfill & Recycling Center - Site No.2 MSWL | Chatham | MSWL | 025-070D(MSWL) | Operating |
| Savannah - Dean Forest Road | Chatham | MSWL | 025-051D(MSWL) | Construction |
| Superior Sanitation - Little Neck Rd (SL) | Chatham | SL | 025-045D(SL) | Closed |

Source: EPD, Land Protection Branch, Solid Waste Management Program, 2019

# 4.0 ANALYTICAL APPROACH

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

- The current critical enterococci 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 enterococci load necessary to achieve the TMDL.

The calculation of the enterococci load in a coastal stream segment requires the enterococci concentration and an estimate of the volume of water affected. A mass balance approach was used to determine the current enterococci load and TMDL. For the listed segments, enterococci sampling data were compared to the regulatory criteria.

## 4.1 Mass Balance Approach

For those water bodies in which sufficient water quality data were collected to list them as impaired, a mass balance approach was used. This method involves comparing the current critical load to the applicable enterococci water quality criteria. It is assumed that these are the critical conditions for aquatic life.

The Little Ogeechee River is a tidal river. The flow regimes of this water body is dictated by the coastal tides, and continually vary as the tide is coming in and going out. As a result, 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:

$$L_{critical} = C_{critical} \times Q_{est}$$

Where:

$L_{critical}$ = current critical enterococci load
$C_{critical}$ = enterococci concentration
$Q_{est}$ = estimated instantaneous flow

and:

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

Where:

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

Since instantaneous monthly samples are used to evaluate compliance with the standards, as well as the need for a TMDL, this flow dependent load, or concentration approach makes it easier to evaluate compliance with the TMDL. Each sample is compared to the STV of 130 CFU/100ml. The figure in Appendix A graphically illustrates the comparison of plots of enterococci concentrations over time in relation to the STV.

The difference between the current critical load and the TMDL represents the load reduction required for the impaired water body to meet the appropriate instream selenium standard. If a single sample exceeds the enterococci criterion, then the TMDL is based on the criteria exceedance requiring the largest load reduction. The percent load reduction can be expressed as follows:

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

# 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 standard. In this case it is the enterococci bacteria standard. A TMDL is the sum of the individual waste load 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 enterococci bacteria, the TMDLs are expressed as counts per 30 days.

A TMDL is expressed as follows:

$$TMDL = \Sigma WLAs + \Sigma LAs + MOS$$

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 segment water quality may be used to evaluate this phase of the TMDL, and if necessary, to reallocate the loads.

The enterococci loads calculated for each listed stream segment include the sum of the total loads from all point and nonpoint sources for the segment. The load contributions to the listed segment from unlisted upstream segments are represented in the background loads, unless the unlisted segment contains point sources that had permit violations for enterococci. In these cases, the upstream point sources are included in the wasteload allocations for the listed segment. In situations where two or more adjacent segments are listed, the enterococci loads to each segment are individually evaluated on a localized watershed basis. Point source loads originating in upstream segments are included in the background loads of the downstream segment. The following sections describe the various enterococci TMDL components.

## 5.1 Waste Load Allocations

### 5.1.1 Wastewater Treatment Facilities

The waste load 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 with flows

greater than 0.1 MGD from municipal and industrial wastewater treatment systems with NPDES end-of-pipe effluent limits established to meet the applicable water quality standard. In addition, the permits will include routine monitoring and reporting requirements

There are currently two facilities in the Ogeechee River Basin that discharge into or within 25 miles upstream of the listed segment. The maximum allocated enterococci loads for these wastewater treatment facilities are given in the table below. These WLA loads were calculated from the permitted flow(s) and the geometric mean enterococci water quality criteria. This was expressed as an accumulated load over a 30-day period, and presented in units of counts per 30 days.

If enterococci limits are not present in facility NPDES permits, effluent sampling for enterococci will be incorporated into each facility's NPDES permit in order to evaluate if each discharge contributes to the violation of the enterococci water quality criteria. Facility effluent monitoring should utilize analytical methods that have a sufficiently low method detection limit so that comparisons to the water quality criteria may be made.

If a facility expands its capacity and the permitted flow increases, the wasteload allocation for the facility would increase in proportion to the flow.

**Table 11. WLAs for the Ogeechee River Basin**

| Facility Name | Permit No. | Receiving Stream | Listed Stream Segment | Bacterial Indictor | WLA (counts/ 30 days) | Concentration (counts/ 100 mL) |
|---|---|---|---|---|---|---|
| City of Savannah (Georgetown WPCP) | GA0046418 | Ogeechee River | Little Ogeechee River (aka Green Island Sound) | Enterococci | 9.74E10 | 35 |
| Consolidated Utilities (Larchmont Estates WPCP) | GA0034819 | Little Ogeechee River | Little Ogeechee River (aka Green Island Sound) | Enterococci | 3.97E10 | 35 |

### 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 waste load allocations from stormwater discharges associated with MS4s (WLAsw) 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 and that which goes through non-permitted point sources, or is sheet flow or agricultural 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 municipal separate storm sewer systems. This can be represented by the following equation:

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

where: $WLA_{SW}$ = Wasteload Allocation for permitted storm water runoff from all MS4 urban areas
$Q_{WLAsw}$ = Runoff from all MS4 urban areas conveyed through permitted storm water structures
$Q_{WLAsw} = \Sigma Q_{urban} \times 0.7$
$\Sigma Q_{urban}$ = Sum of all storm water runoff from MS4 urban
$C_{standard}$ = 30-day geometric mean of 35 cnts/10 mL
= STV of 130 cnts/100 mL

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. 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 storm water management plan (SWMP) or a storm water pollution prevention plan (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

There are no wet and/or dry manure CAFOs located in the vicinity of the listed segments in the Ogeechee River Basin (see Section 3.1.3). Wet manure facilities are either included under an 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. Presently no CAFOs discharge wastewater, 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 enterococci accumulation on land surfaces that is washed off during storm events, including runoff from saturated LAS fields. At this time, 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.

The LA for all flows and conditions can be described by the following equation:

$$LA = Q_{LA} \times C_{Standard}$$

where: LA = Load Allocation
$Q_{LA}$ = Flow from all nonpoint sources
$Q_{LA} = Q_{Total} - (\Sigma Q_{WLA} + \Sigma Q_{WLAsw})$
$Q_{Total}$ = Total flow
$\Sigma Q_{WLA}$ = Sum of all current, potential, and future NPDES permitted wastewater treatment discharges
$\Sigma Q_{WLAsw}$ = Sum of runoff from all MS4 urban areas conveyed through permitted storm water structures

$C_{standard}$ = 30-day geometric mean of 35 cnts/10 mL
= STV of 130 cnts/100 mL

Table 12 presents the total LA expressed as the 30-day geometric mean multiplied by the total nonpoint source flow.

### 5.3 Seasonal Variation

The Georgia enterococci criteria are not seasonal. One set of numeric criteria applies equally to the entire calendar year.

### 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. The MOS values are presented in Table 12.

### 5.5 Total Enterococci Load

The enterococci TMDL for the listed stream segment are dependent on the estimated flow and the applicable state water quality standard.

The total maximum daily enterococci loads for Georgia are given below:

$TMDL_{geo}$ = 35 counts (as a 30-day geometric mean)/100 mL x $Q_{Total}$

$TMDL_{ind}$ = 130 counts (as an individual sample)/100 mL x $Q_{Total}$

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 enterococci standard and the total flow used to calculate the current 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, the NPDES-permitted point discharges with recorded bacteria violations from the nearest upstream sub-watersheds, and a margin of safety (MOS). For these calculations, the enterococci load contributed by a permitted facility to the WLA was not the maximum presented in Table 11, but rather was the product of the applicable enterococci water quality criteria limit and the average monthly discharge at the time of the critical load. 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 segment is presented in Table 12.

The relationships of the current critical concentration to the STV is shown graphically in Appendix A. The vertical distance between the two values represents the concentration reduction necessary to achieve the TMDL. As a consequence of the localized nature of the load evaluations, the calculated enterococci load reductions pertain to point and nonpoint sources occurring within the immediate drainage area of the listed segment. These 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 enterococci standard 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 TMDL, the association between enterococci loads and the potential sources occurring within the sub-watersheds of the impaired segment was examined on a qualitative basis.

## Table 12. Enterococci Loads and Required Load Reductions

| Stream Segment | Description | Bacterial Indicator | Current Load (counts/ 30 days) | TMDL Components | | | | | Percent Reduction Required |
|---|---|---|---|---|---|---|---|---|---|
| | | | | WLA (counts/ 30 days)[1] | WLAsw (counts/ 30 days) | LA (counts/ 30 days) | MOS (counts/ 30 days) | TMDL (counts/ 30 days) | |
| Little Ogeechee River (aka Green Island Sound) [GAR030602040317] | Vernon River to Ossabaw Sound | Enterococci | 2,420 x $Q_{Total}$ (2) | 9.54E10 | 35 x $Q_{WLASW}$ (2) | 35 x $Q_{LA}$ (2) | 3.5 x $Q_{Total}$ (2) | 35 x $Q_{Total}$ (2) | (3) |

Notes:

(4) The assigned enterococci load from the NPDES permitted facilities for WLA was determined as the product of the enterococci 30-day water quality criteria (35 counts/100mL) and the facility average monthly discharge at the time of the critical load.

(5) The impaired segment of the Little Ogeechee River is tidal in nature. Therefore, the current load, load allocations, and TMDL are expressed as a function of the flow Q at any given time

(6) Percent reduction could not be determined due to absence of a discrete current load calculation

# 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 enterococci loads causing the stream to exceed instream standards. The TMDL analysis was performed using the best available data to specify WLAs and LAs that will meet enterococci water quality criteria so as to support the use classification specified for each listed segment.

This TMDL represents part of a long-term process to reduce enterococci loading to meet water quality standards in the Ogeechee River Basin. Implementation strategies will be reviewed and the TMDLs 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, these TMDLs 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 a number of locations across the State each year. Sampling is conducted statewide by EPD personnel in Atlanta, Brunswick, Cartersville, and Tifton. Stream sampling is conducted by CRD personnel. 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 enterococci 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 Enterococci Management Practices

Based on the findings of the source assessment, NPDES point source enterococci 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 enterococci 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, discharge from marine vessels, runoff from improper disposal of waste materials, and leachate from both operational and closed landfills. In agricultural areas, potential sources of enterococci 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 can be a significant source of enterococci bacteria.

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

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

- Implementation of recommended Water Quality management practices in the *Coastal Georgia Regional Water Plan* (GA EPD, 2017);
- Implementation of *Georgia's Best Management Practices for Forestry* (GFC, 2009);
- Implementation of *Best Management Practices for Georgia Agriculture* (GSWCC, 2013) and Adoption of National Resource Conservation Service (NRCS) Conservation Practices for agriculture;
- Implementation of 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

Point sources are defined as discharges of treated wastewater or stormwater into rivers and streams at discrete locations. 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 EPD rules and regulations, all discharges from point source facilities are required to be in compliance with the conditions of their NPDES permit at all times.

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. 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 storm water management plan (SWMP) or a storm water pollution prevention plan (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.

Municipal and industrial wastewater treatment facilities with the potential for bacteria in their discharge are given end-of-pipe limits to meet the applicable water quality standard. An exception is constructed wetland systems, which have a natural level of bacteria input from animals attracted to the artificial wetlands. Wetland bacteria permit limits are monitored prior to discharge to the wetlands. In addition, the permits include routine monitoring and reporting requirements.

### 6.2.2 Nonpoint Source Approaches

EPD is responsible for administering and enforcing laws to protect the waters of the State. EPD is the lead agency for implementing the State's Nonpoint Source Management Program. Regulatory responsibilities that have a bearing on nonpoint source pollution include establishing water quality standards and use classifications, assessing and reporting water quality conditions, and regulating land use activities that may affect water quality. Georgia is working with local governments, agricultural and forestry agencies such as the Natural Resources Conservation Service, the Georgia Soil and Water Conservation Commission, and the Georgia Forestry Commission, to foster the implementation of BMPs to address nonpoint source pollution. In addition, public education efforts are being targeted to individual stakeholders to provide information regarding the use of BMPs to protect water quality. The following sections describe, in more detail, recommendations to reduce nonpoint source loads of enterococci bacteria in Georgia's surface waters.

#### 6.2.2.1 Agricultural Sources

EPD should coordinate with other agencies that are responsible for agricultural activities in the state to address issues concerning enterococci 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 enterococci 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. 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 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 enterococci bacteria can be significant in the Ogeechee River Basin urban areas. Urban sources of enterococci can best be addressed using a strategy that involves 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. In addition to water quality monitoring programs, discussed in Section 6.1, the following activities and programs conducted by cities, counties, and state agencies are recommended to:

- Uphold requirements that all new and replacement sanitary sewage 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;

- Maintain compliance with stormwater NPDES permit requirements; and

- 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

Permitted discharges will be regulated through the NPDES permitting process described in this report. An allocation to a point source discharger does not automatically result in a permit limit or a monitoring requirement. Through its NPDES permitting process, EPD will determine whether a new or existing discharger has a reasonable potential of discharging enterococci levels equal to or greater than the total allocated load. The results of this reasonable potential analysis will determine the specific type of requirements in an individual facility's NPDES permit. As part of its analysis, EPD will use its USEPA approved 2003 NPDES Reasonable Potential Procedures to determine whether monitoring requirements or effluent limitations are necessary.

Georgia is working with local governments, agricultural and forestry agencies, such as the Natural Resources Conservation Service, the Georgia Soil and Water Conservation Commission, and the Georgia Forestry Commission, to foster the implementation of best management practices to address nonpoint sources. In addition, public education efforts will be targeted to individual stakeholders to provide information regarding the use of best management practices to protect water quality.

## 6.4 Public Participation

A forty five-day public notice was provided for this TMDL. During that time, the TMDL was available on the GA EPD website, a copy of the TMDL was provided on request, and the public was 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 segments 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 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 2018 Integrated 305(b)/303(d) list of not supporting waters in *Water Quality in Georgia 2016-2017* (GA EPD, 2018) available on the GA EPD website. The following table summarizes the descriptive information provided in the 303(d) list.

**Waterbodies Listed on the 2018 303(d) List for Enterococci in the Ogeechee River Basin**

| Stream Segment | Location | Reach ID | Segment Length (miles) | Designated Use |
|---|---|---|---|---|
| **Little Ogeechee River (aka Green Island Sound)** | Vernon River to Ossabaw Sound | GAR030602040317 | 1 | Recreation |

Enterococci bacteria are used as an indicator of the potential presence of pathogens in a stream. The current water quality standard for the recreation designated use in coastal waters [*State of Georgia's Rules and Regulations for Water Quality Control*, Chapter 391-3-6-.03(6)(b)(i)] states that culturable enterococci counts are not to exceed a geometric mean of 35 colony forming units (CFU) per 100 mL during a 30-day interval. Additionally, enterococci counts shall not exceed a statistical threshold value of 130 CFU/100 mL for any individual sample.

## 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 enterococci loads from wastewater treatment facilities usually do not contribute to impairments. This is because these facilities are required to treat to levels equivalent

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 enterococci in urban areas include wastes that are attributable to domestic animals, illicit discharges of sanitary waste, leaking septic systems, discharge from marine vessels, runoff from improper disposal of waste materials, and leachate from closed landfills. In non-urban areas, potential sources of enterococci 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, can be a significant source of enterococci bacteria.

### 7.3 Management Practices and Activities

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, the Natural Resource Conservation Service (NRCS), the Georgia Soil and Water Conservation Commission (GSWCC), and the Georgia Forestry Commission (GFC) to foster implementation of BMPs that address nonpoint source pollution. The following management practices are recommended to reduce enterococci 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 storm water management plans are in place and being implemented by the local governments, and by the industrial facilities located in the watershed;
- Adoption and implementation of 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.
- 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;
- Implementation of recommended Water Quality management practices in the *Coastal Georgia Regional Water Plan* (GA EPD, 2017)
- Adoption and implementation of NRCS Conservation Practices for primary agricultural lands;
- Implementation of *Best Management Practices for Georgia Agriculture* (GSWCC, 2013)
- Application of BMPs appropriate to specific non-urban and urban land uses;
- Adoption of local ordinances (i.e. septic tanks, stormwater, etc.) that address local water quality; and
- Implementation of *Georgia's Best Management Practices for Forestry* (GFC, 2009);
- Further develop and streamline mechanisms for reporting and correcting illicit discharges, breaks, surcharges, and general sanitary sewer system problems;

Public education efforts target individual stakeholders to provide information regarding the use of BMPs to protect water quality. EPD will continue efforts to increase awareness and educate the public about the impact of human activities on water quality.

## 7.4 Monitoring

EPD encourages local governments and municipalities to develop water quality monitoring programs. These programs can help pinpoint various enterococci 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. 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, EPD will continue to determine and assess the appropriate point and non-point source management measures needed to achieve the TMDLs and also 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 best management practices 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.

EPD will work to support watershed restoration, improvement and protection projects that address nonpoint source pollution. This is a process whereby EPD and/or Regional Commissions or other agencies or local governments, under a contract with 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: Clean Water Act 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 EPD accepts and/or approves the plan. Watershed management plans intended to address this TMDL and other water quality concerns, prepared for EPD, and for which EPD and/or the 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 are prepared for EPD, and for which EPD and/or the EPD Contractor are responsible, and will be able to comment on them before they are finalized.

EPD will offer technical and financial assistance, when and where available, in the preparation of watershed management plans that address the impaired waterbodies listed in this TMDL document. 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 general 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.

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.

# REFERENCES

Carter, R.F., 1982. Storage Requirements for Georgia Streams, USGS, Water Resources Investigations, Open File Report 82-557.

CWP, 2009. Coastal Stormwater Supplement to the Georgia Stormwater Management Manual, First Edition, Center for Watershed Protection. April 2009.

Federal Register, 1990. Federal Register, Part II: Environmental Protection Agency, Vol. 55, No. 222, November 16, 1990.

GA Dept. of Agriculture, 2017. EPD NPDES LAS Operation Info List May 2017, Department of Agriculture, Livestock and Poultry Field Forces. May 2017.

GA Dept. of Public Health, 2016. Most Current Summary Data Septic Inspections 2016-08-06, Department of Public Health, Environmental Health Section. August 2016.

GA EPD, 2001. *Ogeechee River Basin Management Plan 2001,* State of Georgia, Department of Natural Resources, Environmental Protection Division, Water Protection Branch.

GA EPD, 2015. *State of Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6-.03(6)(b)*, State of Georgia, Department of Natural Resources, Environmental Protection Division, Water Protection Branch, amended October 2015.

GA EPD, 2017. *Coastal Georgia Regional Water Plan,* Adopted by GA EPD November 2011, Revised June 2017.

GA EPD, 2017. Personal Communications with State of Georgia, Department of Natural Resources, Environmental Protection Division, Land Protection Branch. April 2017.

GA EPD, 2017. Solid Waste Facility Information, State of Georgia, Department of Natural Resources, Environmental Protection Division, Land Protection Branch.

GA EPD, 2018. *Water Quality in Georgia 2016 – 2017*, Georgia Department of Natural Resources, Environmental Protection Division, Watershed Protection Branch.

GA WRD, 2007. Personal Communications with Region IV Office, Wildlife Resources Division, Georgia Department of Natural Resources, Thomson, GA, May 2007.

Georgia Water Council, 2008. *Georgia Comprehensive State-wide Water Management Plan*, Atlanta, Georgia, January 2008.

MNGWPD, 2017. *Metropolitan North Georgia Water Planning District Water Resource Management Plan,* June 2017

UGA, 2015. Animal Inventory, Center for Agribusiness and Economic Development, College of Agriculture and Environmental Sciences, University of Georgia, 304A Lumpkin House, Athens, Georgia 30605.

USEPA, 1991. *Guidance for Water Quality-Based Decisions*: The TMDL Process, EPA 440/4-91-001, U.S. Environmental Protection Agency, Assessment and Watershed Protection Division, Washington, D.C.

# Appendix A

# Enterococci Monitoring Data

## Water Quality Monitoring Stations

| Stream Segment | Location | GA EPD Monitoring Station No. | Monitoring Station Coordinates | Monitoring Station Description | Sample Date Range |
|---|---|---|---|---|---|
| Little Ogeechee River (aka Green Island Sound) | Vernon River to Ossabaw Sound | SH_02_317 (0204030402) | 31.88823, -81.08798 | Little Ogeechee River at Green Island | 2015-2016 |

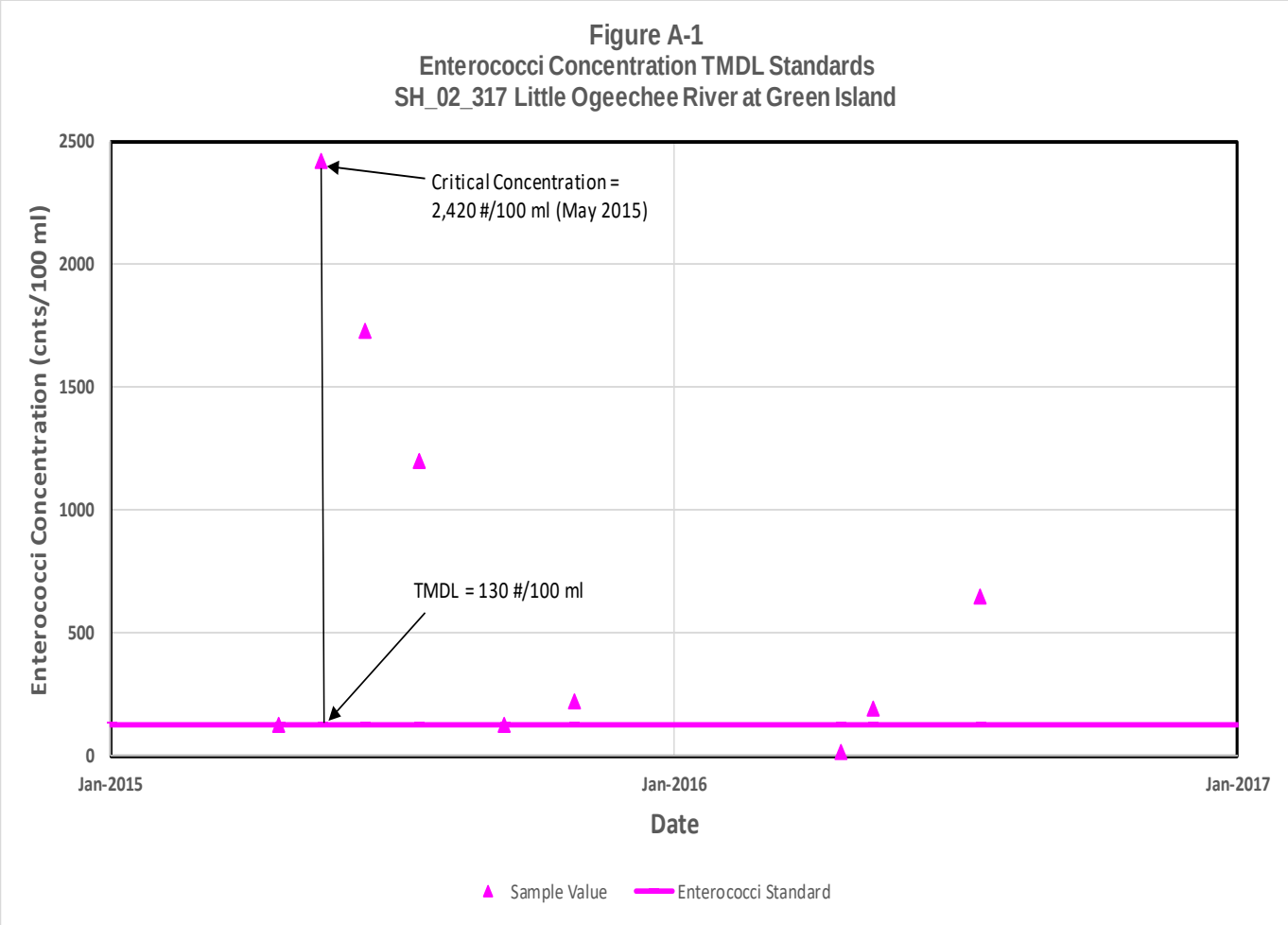


**Table A-1. Data for Figure A-1**

| Date | Fecal Coliform (#/100ml) | Fecal Coliform Standard (#/100ml) | % Reduction |
|---|---|---|---|
| 04/20/2015 | 125.7 | 130 | -3 |
| **05/18/2015** | **2419.17** | **130** | **95** |
| 06/15/2015 | 1733 | 130 | 92 |
| 07/20/2015 | 1203.31 | 130 | 89 |
| 08/20/2015 | 172.8 | 130 | 25 |
| 09/14/2015 | 125 | 130 | -4 |
| 10/29/2015 | 225.8 | 130 | 42 |
| 04/19/2016 | 15.8 | 130 | -723 |
| 05/10/2016 | 196.8 | 130 | 34 |
| 07/19/2016 | 648.8 | 130 | 80 |