DRAFT

Total Maximum Daily Load

Evaluation

for

Stream Segments

in the

Savannah 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
Atlanta, Georgia

February 2020

Table of Contents

Section **Page**

EXECUTIVE SUMMARY iv

1.0 INTRODUCTION 1
1.1 Background 1
1.2 Watershed Description 1
1.3 Water Planning Councils 2
1.4 Water Quality Standard 3

2.0 WATER QUALITY ASSESSMENT 11

3.0 SOURCE ASSESSMENT 12
3.1 Point Source Assessment 12
3.1.1 Wastewater Treatment Facilities 12
3.1.2 Regulated Stormwater Discharges 14
3.1.3 Concentrated Animal Feeding Operations 15
3.2 Nonpoint Source Assessment 16
3.2.1 Wildlife 17
3.2.2 Agricultural Livestock 17
3.2.3 Urban Development 18

4.0 ANALYTICAL APPROACH 21
4.1 Loading Curve Approach 21

5.0 TOTAL MAXIMUM DAILY LOAD 24
5.1 Wasteload Allocations 24
5.1.1 Wastewater Treatment Facilities 24
5.1.2 Regulated Stormwater Discharges 25
5.1.3 Concentrated Animal Feeding Operations 26
5.2 Load Allocations 27
5.3 Seasonal Variation 27
5.4 Margin of Safety 27
5.5 Total Fecal Coliform Load 27

6.0 RECOMMENDATIONS 29
6.1 Monitoring 30
6.2 Fecal Coliform Management Practices 30
6.2.1 Point Source Approaches 31
6.2.2 Nonpoint Source Approaches 31
6.3 Reasonable Assurance 33
6.4 Public Participation 33

7.0 INITIAL TMDL IMPLEMENTATION PLAN 34
7.1 Impaired Segments 34
7.2 Potential Sources 36
7.3 Management Practices and Activities 36
7.4 Monitoring 38
7.5 Future Action 38

REFERENCES 40

List of Tables

1. Stream Segment Listed on the 2018 303(d) List for Fecal Coliform Bacteria in the Savannah River Basin
2. Savannah River Basin Land Coverage
3. Fecal Coliform Sampling Stations and Dates
4. NPDES Facility Discharging Bacteria into Savannah River Basin 303(d) Listed Stream Segments
5. Permitted MS4s in the Savannah River Basin Discharging to the Watershed of the 303(d) Listed Segments
6. Percentage of MS4 City or County Urbanized Area Upstream of 303(d) Listed Segment in the Savannah River Basin
7. Dry Manure Poultry Operations in the Vicinity of 303(d) Listed Segments in the Savannah River Basin
8. Estimated Agricultural Livestock Populations in Counties Containing the 303(d) Listed Segment Watershed in the Savannah River Basin
9. Estimated Number of Septic Systems in Counties Containing the Watershed of the 303(d) Listed Segment in the Savannah River Basin
10. Permitted Land Application Systems Upstream of 303(d) Listed Segments in the Savannah River Basin
11. Landfills Upstream of 303(d) Listed Water Bodies in the Savannah River Basin
12. USGS Flow Gauge Located on the 303(d) Listed Segment in the Savannah River Basin
13. WLAs for the Savannah River Basin
14. Fecal Coliform Loads and Required Fecal Coliform Load Reductions

List of Figures

1. Savannah River Basin and the River Basins of Georgia
2. USGS 8-Digit HUCs for Savannah River Basin
3. Impaired Stream Segment of Kettle Creek in Upper Savannah River Sub-basin
4. Impaired Stream Segment of Savannah River in Lower Savannah River Sub-basin
5. Boundaries of the Regional Water Planning Councils and the Metropolitan North Georgia Water Planning District.

List of Appendices

A. 30-day Geometric Mean Fecal Coliform 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 two stream segments in the Savannah 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 water quality criteria for fecal coliform bacteria for a water with a designated use of fishing are as follows:

> For the months of May through October, when water contact recreation activities are expected to occur, fecal coliform counts are not to exceed a geometric mean of 200 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. For the months of November through April, fecal coliform counts are not to exceed a geometric mean of 1,000 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 per 100 mL for any sample.

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 fecal coliform criteria.

In June 2018, 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. Pending EPA approval of the proposed criteria, this TMDL will use fecal coliform as the bacterial indicator; upon EPA's

approval of the proposed E. coli and enterococci criteria, this TMDL will use these more appropriate bacteria indicators. The TMDL can be converted from fecal coliform to E. coli using a 0.63 conversion factor.

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 as a result of storm events.

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

- The current critical fecal coliform 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 fecal coliform load necessary to achieve the TMDL.

The calculation of the fecal coliform load at any point in a stream requires the fecal coliform 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 fecal coliform loads and required reductions for each of the listed segments are summarized in the table below.

Management practices that may be used to help reduce fecal coliform 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) and the Savannah-Upper Ogeechee 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 *Georgia Stormwater Management Manual* (ARC, 2016) to facilitate water quality treatment of stormwater runoff, including bacteria removal, through structural stormwater BMP installation.

The amount of fecal coliform 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.

Bacteria Loads and Required Bacteria 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)	
Kettle Creek (GAR030601050106)	Hobb Branch to Little Kettle Creek	Fecal coliform	3.88E12	--	--	8.54E11	9.49E10	9.49E11	76
		E. Coli	(3)	--	--	5.41E11	6.01E10	6.01E11	Undetermined (4)
Savannah River/Front River (GAR030601090320)	Ebenezer Creek to SR 25	Fecal coliform	1,750 x Q_{Total} (2)	3.17E9	200 x Q_{WLASW} (2)	200 x Q_{LA} (2)	20 x Q_{Total} (2)	200 x Q_{Total} (2)	43
		E. Coli	(3)	3.32E12	126 x Q_{WLASW} (2)	126 x Q_{LA} (2)	12.6 x Q_{Total} (2)	126 x Q_{Total} (2)	Undetermined (4)

Notes:

(1) The assigned fecal coliform load from the NPDES permitted facility for WLA was determined as the product of the fecal coliform permit limit and the facility average monthly discharge at the time of the critical load.
(2) The impaired segment of the Savannah 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) Sample was not analyzed for E. coli, therefore critical load calculation not possible
(4) Percent reduction could not be determined due to absence of 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 its designated use classification due to exceedances of water quality standards for fecal coliform bacteria. Fecal coliform bacteria are used as an indicator of the potential presence of pathogens in a stream. Table 1 presents the stream segments in the Ogeechee River Basin included on the 2018 303(d) list for exceedances of the fecal coliform standard criteria.

Table 1. Stream Segment Listed on the 2018 303(d) List for Fecal Coliform Bacteria in the Savannah River Basin

Stream Segment	Location	Reach ID	Segment Length (miles)	Designated Use
Kettle Creek	Hobb Branch to Little Kettle Creek	GAR030601050106	6	Fishing
Savannah River/Front River	Ebenezer Creek to SR 25	GAR030601090320	28	Drinking Water, Coastal Fishing

1.2 Watershed Description

The Savannah River Basin encompasses more than 10,570 square miles and the river forms the border between the states of South Carolina and Georgia. The Savannah River begins in the Blue Ridge Mountains of north Georgia and South Carolina where the Seneca and Tugaloo rivers meet and flow into Lake Hartwell. The Savannah River then flows southeast for more than 300 miles to the Atlantic Ocean. Upstream of Augusta, the river flows through Clark Hill Reservoir and Lake Stephens. The river flows

through three geographically distinct ecoregions, beginning its meandering path in the Blue Ridge, flowing through the rich soils of the Piedmont, and ending in the Coastal Plain, where it forms a braided network of tidal creeks that empty into the Atlantic Ocean.

The United States Geologic Survey (USGS) has divided the Savannah Basin into nine sub-basins, or Hydrologic Unit Codes (HUCs), of which seven are partially or completely located within Georgia. The HUCs located in Georgia are numbered 03060102 through 03060106, and 03060108 through 03060109. Figure 1 shows the location of the Ogeechee River Basin in Georgia. and Figure 2 shows the major political boundaries, water features, and U.S.G.S 8-digit HU watersheds within the Savannah River Basin. Figures 3 and 4 show the impaired water bodies and their representative watersheds within the Savannah River Basin.

The land use characteristics of the Savannah 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 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 5 shows the boundaries of the RWPCs and the MNGWPD. The four 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 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 Savannah River Basin is Fishing. The criterion violated is listed as fecal coliform. The potential causes listed include urban runoff, nonpoint sources, and municipal facilities. In June 2018, 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. The use classification water quality standards for fecal coliform bacteria, 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, 2018), are:

(a) Drinking Water Supplies: Those waters approved as a source for public drinking water systems permitted or to be permitted by the Environmental Protection Division. Waters classified for drinking water supplies will also support the fishing use and any other use requiring water of a lower quality.

(i) Bacteria: The provisions of paragraph 391-3-6-.03(6)(a)(i)1. shall apply until the effective date of EPA's final approval of the criteria specified in paragraph 391-3-6-.03(6)(a)(i)2.

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.

2. For the months of May through October, when water contact recreation activities are expected to occur, culturable E. coli not to exceed a geometric mean of 126 counts 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 E. coli statistical threshold value (STV) of 410 counts per 100 mL in the same 30-day interval. Should water quality and sanitary studies show E. coli levels from non-human sources exceed 126 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean E. coli shall not exceed 189 counts per 100 mL in lakes and reservoirs and 315 counts per 100 mL in free flowing freshwater streams. For the months of November through April, culturable E. coli not to exceed a geometric mean of 630 counts 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 E. coli statistical threshold value (STV) of 2050 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.

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

(iii) Bacteria: The provisions of paragraph 391-3-6-.03(6)(c)(iii)1. shall apply until the effective date of EPA's final approval of the criteria specified in paragraphs 391-3-6-.03(6)(c)(iii)2. and 391-3-6-.03(6)(c)(iii)3.

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. Estuarine waters: For the months of May through October, when water contact recreation activities are expected to occur, culturable enterococci not to exceed a geometric mean of 35 counts 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 counts per 100 mL the same 30-day interval. Should water quality and sanitary studies show enterococci levels from non-human sources exceed 35 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean enterococci shall not exceed 53 counts per 100 mL in lakes and reservoirs and 88 counts per 100 mL in free flowing freshwater streams. For the months of November through April, culturable enterococci not to exceed a geometric mean of 175 counts 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 650 counts per 100 mL the same 30-day interval.

3. All other fishing waters: For the months of May through October, when water contact recreation activities are expected to occur, culturable E. coli not to exceed a geometric mean of 126 counts 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 E. coli statistical threshold value (STV) of 410 counts per 100 mL in the same 30-day interval. Should water quality and sanitary studies show E coli levels from non-human sources exceed 126 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean E. coli shall not exceed 189 counts per 100 mL in lakes and reservoirs and 315 counts per 100 mL in free flowing freshwater streams. For the months of November through April, culturable E. coli not to exceed a geometric mean of 630 counts 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 E. coli statistical threshold value (STV) of 2050 counts per 100 mL in the same 30-day interval.

4. 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.

5. 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.

(f) Coastal Fishing: This classification will be applicable to specific sites when so designated by the Environmental Protection Division. For waters designated as "Coastal Fishing", site specific criteria for dissolved oxygen will be assigned. All other criteria and uses for the fishing use classification will apply for coastal fishing.

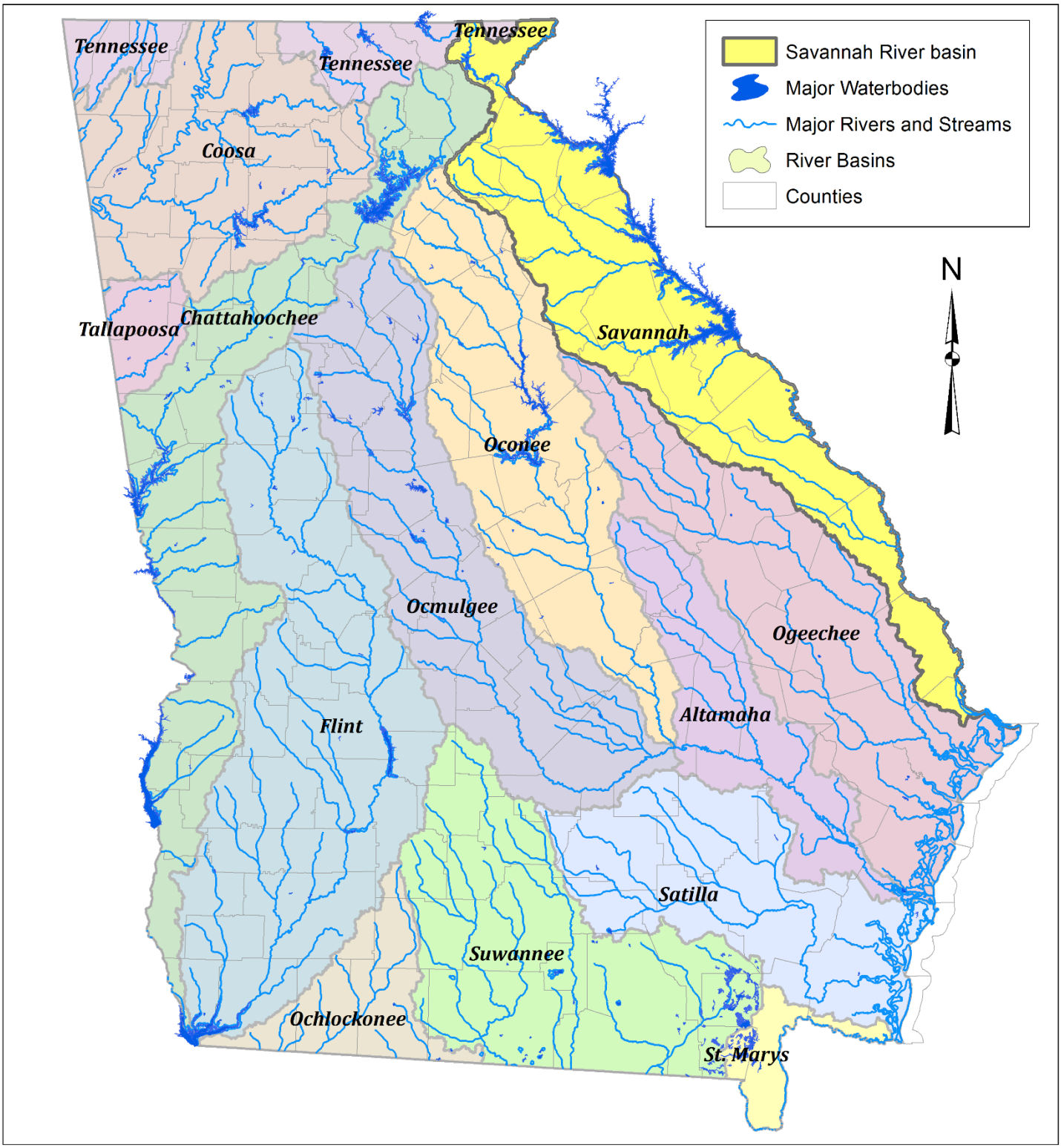

Figure 1. Savannah River Basin and the River Basins of Georgia

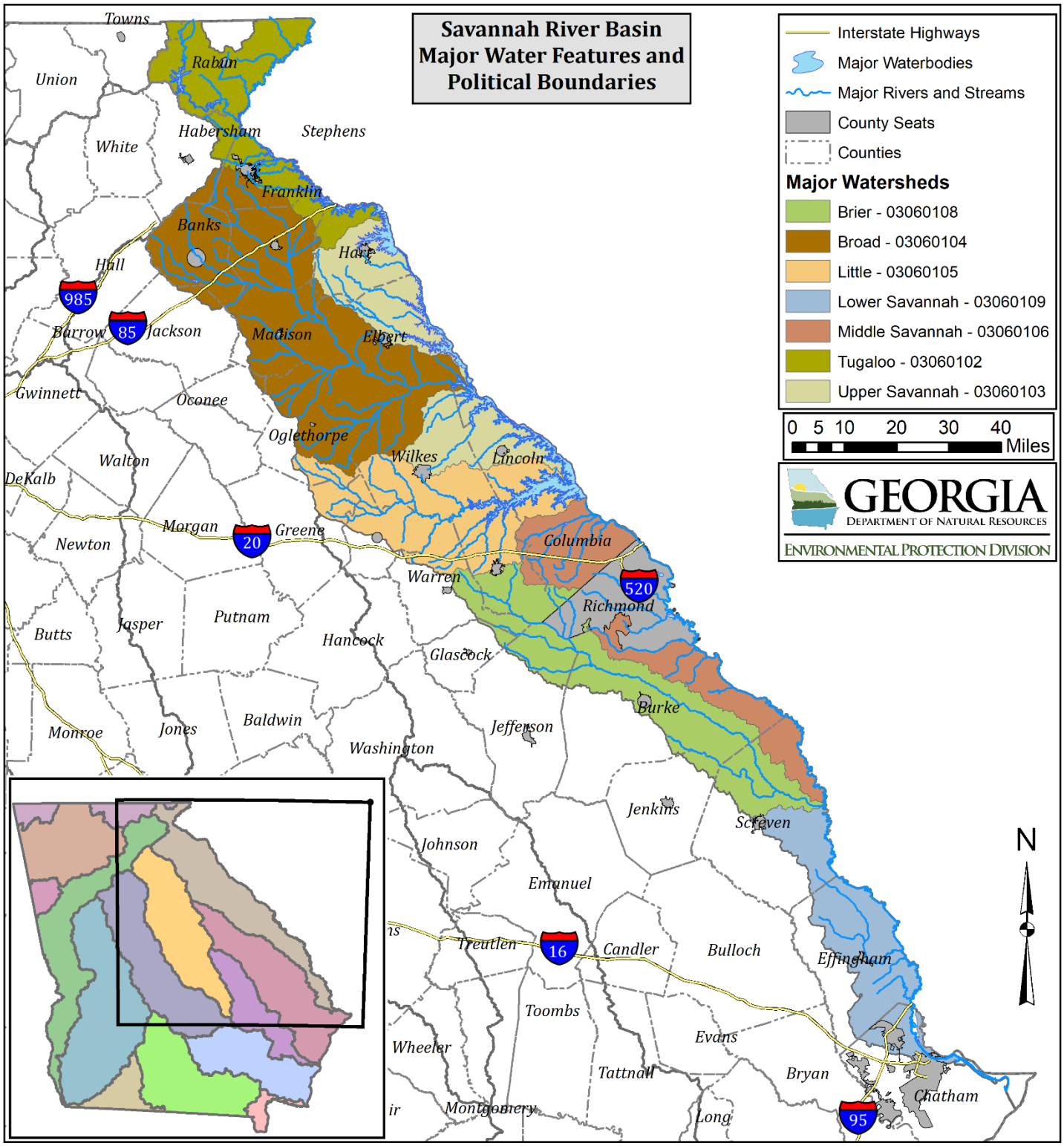

Figure 2. USGS 8-Digit HUCs for Savannah River Basin

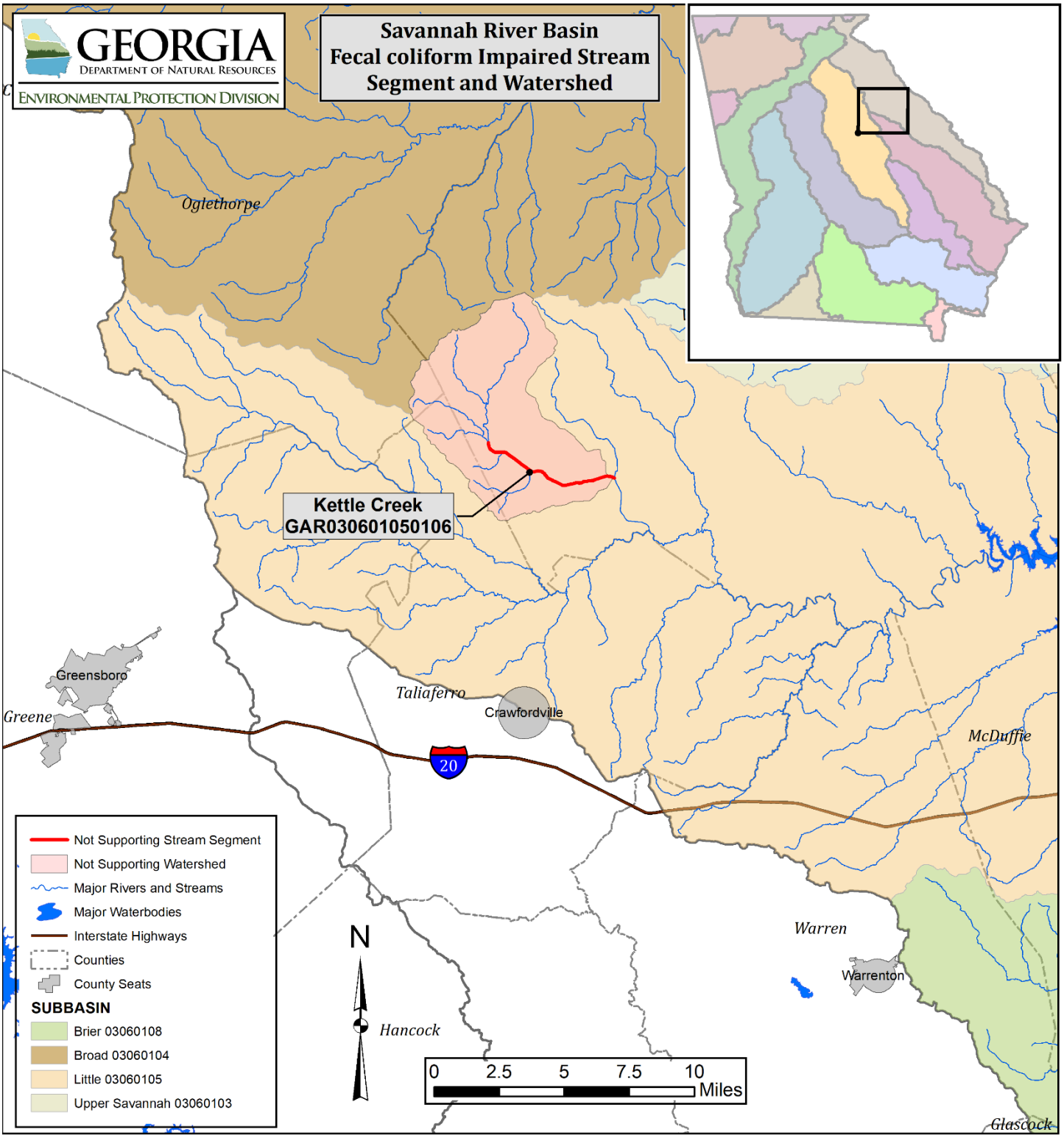

Figure 3. Impaired Stream Segment of Kettle Creek in Upper Savannah River Sub-basin

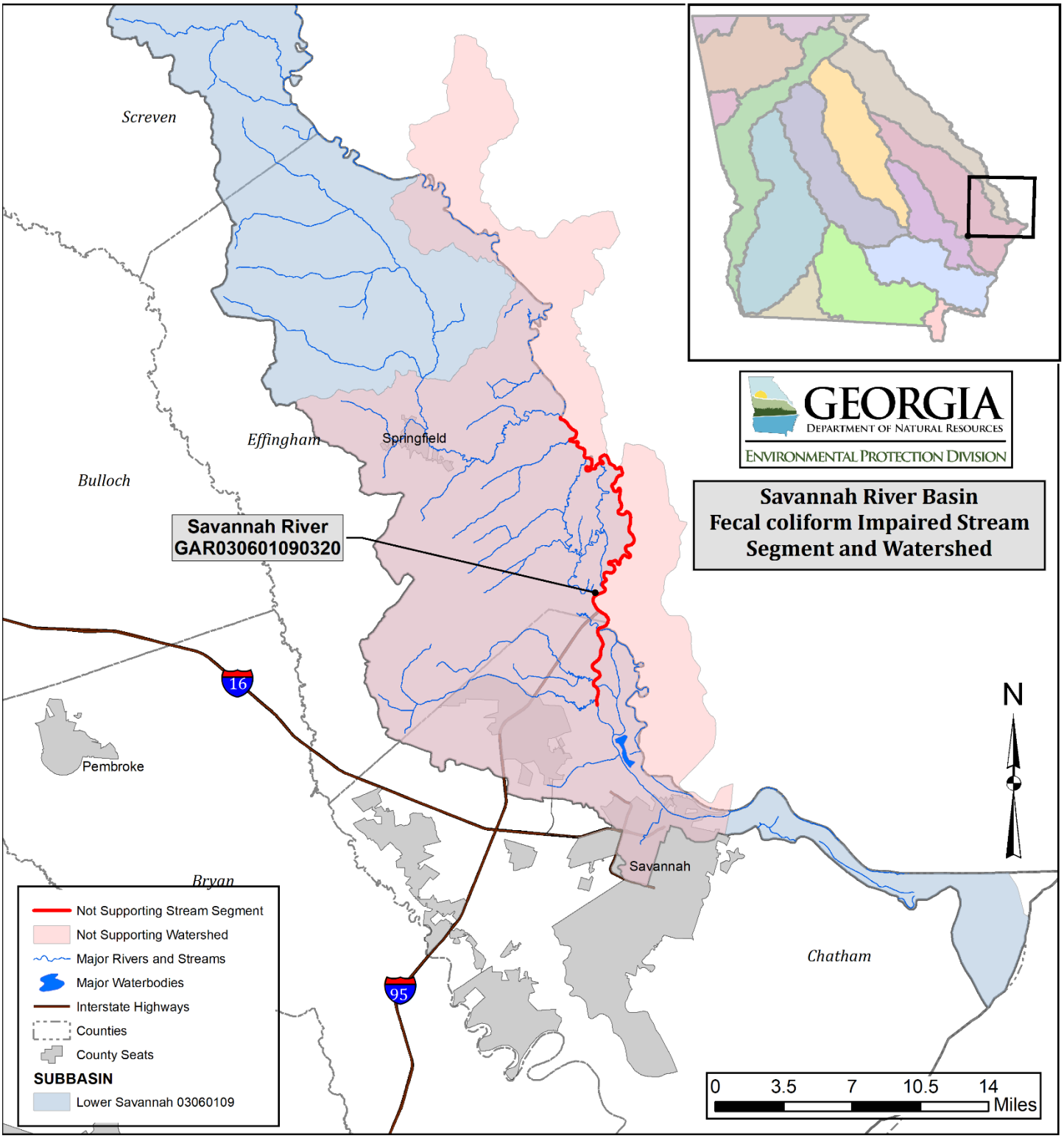

Figure 4. Impaired Stream Segment of Savannah River in Lower Savannah River Sub-basin

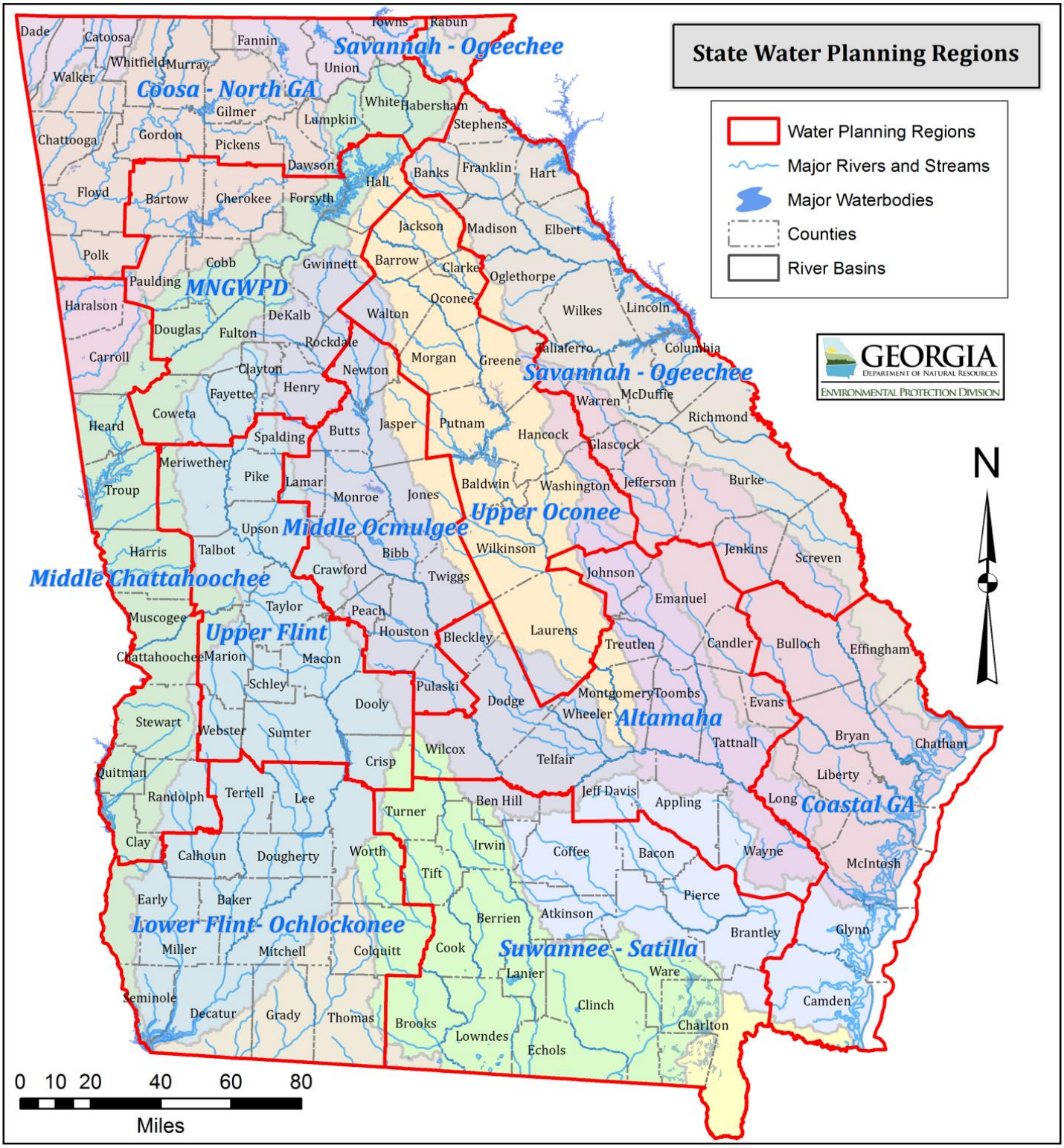

Figure 5. Boundaries of the Regional Water Planning Councils and the Metropolitan North Georgia Water Planning District.

Table 2. Savannah River Basin Land Coverage

Stream/Segment	Land Use Categories - Acres (Percent)													Total
	Open Water	Developed, Low Intensity	Developed, Medium Intensity	Developed, High Intensity	Rock Outcrop, Sand, Clay	Quarries, Strip Mines, Gravel pits	Clearcut / Sparse	Forest	Row Crops	Pasture, Hay	Other Grasses (Developed Open Space, Utility Swaths, golf courses)	Forested Wetlands	Non-Forested Wetlands	
Kettle Creek (GAR030601050106)	13.6	177.5	33.4	9.8	1.6	0	1561	16219	40.9	3976.6	14912.6	619.6	2.7	37568.1
	0.04%	0.47%	0.09%	0.03%	0.00%	0.00%	4.16%	43.17%	0.11%	10.59%	39.69%	1.65%	0.01%	100%
Savannah River/Front River (GAR030601090320)	6364	8224.1	6927.8	9791.8	275.3	19.8	11251	62175.8	5044.8	12487	14912.6	119179.9	10156.5	266810.6
	2.39%	3.08%	2.60%	3.67%	0.10%	0.01%	4.22%	23.30%	1.89%	4.68%	5.59%	44.67%	3.81%	100%

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 fecal coliform 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 criteria. Water quality samples collected within a 30-day period that have a geometric mean in excess of 200 counts per 100 milliliters during the period May through October, or in excess of 1000 counts per 100 milliliters during the period November through April, are in violation of the bacteria water quality standard. There is also a single sample maximum criterion (4000 counts per 100 milliliters) for the months of November through April.

Fecal coliform data used for development of the TMDL in this document were collected during calendar years 2012 through 2016 by GA EPD as part of the trend monitoring program. A summary of sampling station locations and sampling dates is given in Table 3. The raw data are presented in Appendix A.

Table 3. Fecal Coliform Sampling Stations and Dates – Savannah River Basin

Stream Segment	Location	GA EPD Monitoring Station No.	Monitoring Station Description	Sample Date Range
Kettle Creek (GAR030601050106)	Hobb Branch to Little Kettle Creek	RV_01_144	Kettle Creek at Stone Ridge Road	2016
Savannah River/Front River (GAR030601090320)	Ebenezer Creek to SR 25	RV_01_120	Savannah River - U.S. Highway 17 (Houlihan Bridge)	2012-2016

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 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 bacteria to receiving waters. There are three NPDES permitted discharges with flow greater than 0.1 million gallons per day (MGD) identified in the watershed of the listed segment in the Savannah River Basin that could potentially impact streams on the 2018 303(d) list for fecal coliform bacteria. Table 4 provides the monthly average discharge flow and fecal coliform concentrations for this facility. These data were obtained from calendar years 2012 through 2016 Discharge Monitoring Reports (DMR). The current permitted flow and fecal coliform concentrations are also included in this table.

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 Savannah River Basin.

Table 4. NPDES Facility Discharging Fecal Coliform Bacteria into Savannah River Basin 303(d) Listed Stream Segment

Facility Name	NPDES Permit No.	Receiving Stream	303(d) Listed Segment	Actual Discharge		Current NPDES Permit Limits		Number of FC Violations[c]
				Avg. Monthly Flow (MGD)[a]	Avg Monthly FC (#/100mL)[b]	Avg Monthly Flow (MGD)	Average Monthly FC (#/100mL)[b]	
City of Savannah (President St. WRF)	GA0025348	Savannah River	Savannah River / Front River (GAR030601090320)	19.64 (14.91-27.65) (2012-2016)	6.89 (1.9-26.5) (2012-2016)	27	200	1
City of Savannah (Crossroads WPCP)	GA0038326	St. Augustine Creek		2.28 (1.82-2.72) (2012-2016)	3.47 (2.0-33.0) (2012-2016)	3.0	200	0
City of Rincon WPCP	GA0046442	Trib. To Sweigoffer Creek		0.65 (0.37-0.97) (2012-2016)	1.3 (1.0-3.0) (2012-2016)	1.0	23	0

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

Notes: [a] Values shown are the annual average of the monthly average flows and the monthly average ranges.
[b] Values shown are the annual average of the monthly geometric means and the monthly average ranges.
[c] Both monthly and weekly violations included.

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 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

Storm water discharges associated with industrial activities are currently covered under the 2017 NPDES General Permit for Stormwater Discharges Associated with Industrial Activity (GAR050000) also called the Industrial General Permit (IGP). This permit requires visual monitoring of storm water discharges, site inspections, implementation of Best Management Practices (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 2017 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.

3.1.2.2 MS4 NPDES Permits

The collection, conveyance, and discharge of diffuse storm water to local water bodies by a public entity is 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-storm water 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 storm water 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 not supporting streams, public education and involvement, post-construction storm water controls, low impact development, and annual reporting requirements must all be addressed by the permittee on an ongoing basis. As of 2017, 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 storm water permit under the Phase II storm water regulations. An urbanized area is defined as an area with a residential population of at least 50,000 people and an overall population density of at least 1,000 people per square mile. As of 2015, 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 storm water regulations in Georgia. All municipal Phase II permitees 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 storm water management, and pollution prevention in municipal operations. Table 5 lists the permitted MS4s that discharge into the stream segment not supporting its designated use for fecal coliform.

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

Stream Segment	MS4 Permittee	Permit Number	Permit Phase
Savannah River / Front River	Chatham County	GAS000206	1M
	Effingham County	GAG610032	2S
	City of Savannah	GAS000205	1M
	City of Pooler	GAS000209	1M
	City of Port Wentworth	GAS000210	1M
	City of Bloomingdale	GAS000207	1M
	Garden City	GAS000208	1M

Source: Nonpoint Source Program, GA EPD, 2017

Table 6 lists the Phase II MS4 city or county urbanized areas upstream of the listed segment in the Savannah 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 Savannah River Basin

303(d) Listed Stream Segment	Location	Total Area (square miles)	% In MS4 Urbanized Area
Savannah River/Front River	Ebenezer Creek to SR 25	35.34	8.48%

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 watershed of the listed segment in the Savannah 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 bacteria. However, land-applied litter previously stored for an extended length of time typically exhibits very low bacteria levels. Table 7 summarizes the dry manure poultry operations located in the watershed of the listed segment in the Savannah River Basin.

Table 7. Dry Manure Poultry Operations in the Vicinity of 303(d) Listed Segments in the Savannah River Basin

Name	303(d) Listed Stream Segment	County	Animal Type	Total Number of Animals	Permit No.
Kettle Creek					
Clay Walker Farm	Kettle Creek	Wilkes	Poultry	154,000	--
Gunter Farms	Kettle Creek	Wilkes	Poultry	142,500	--
Armour Bros. Inc.	Kettle Creek	Wilkes	Poultry	448,000	--

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 abundant throughout the Savannah 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 Savannah 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 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 8 provides the estimated number of beef cattle, dairy cattle, goats, horses, swine, sheep, and chickens reported by county.

Table 8. Estimated Agricultural Livestock Populations in Counties Containing the 303(d) Listed Segment Watershed in the Savannah 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
Wilkes	7,260	808	NA	376	235	559	-	58	7,287,301

Source: Center for Agribusiness and Economic Development, UGA 2015

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 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 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. 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 Savannah River Basin may be attributed to failure of septic systems and illicit discharges of raw sewage. Table 9 below presents the number of septic systems in counties containing the watershed of the 303(d) listed segment in the Savannah River Basin existing at the end of 2007 and the number existing at the end of 2017. 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 2007 through 2017 is given. These data show an increase in the number of septic systems in all of the counties. Often, this is a reflection of population increases outpacing the expansion of sewage collection systems.

Table 9. Estimated Number of Septic Systems in Counties Containing the Watershed of the 303(d) Listed Segment in the Savannah 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
Wilkes	3,481	3,717	236	56

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

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 bacteria to nearby surface waters. Runoff of storm water might also carry surface

residual containing bacteria. Listed in table 10 below are the permitted LAS systems with a flow greater than 0.1 MGD identified in the Savannah River Basin that could potentially impact the stream segments in this TMDL.

Table 10. Permitted Land Application Systems Upstream of 303(d) Listed Segments in the Savannah River Basin

LAS Name	303(d) Listed Stream Segment	County	Permit No.	Type	Flow (MGD)
Effingham County – South WRF	Savannah River/Front River	Effingham	GAJ020016	Municipal	1.0
Effingham County Power, LLC	Savannah River/Front River	Effingham	GAJ010564	PID	0.24
Coastal Water & Sewage Co. (Westwood Height & Mill Creek WPCP)	Savannah River/Front River	Effingham	GAJ020234	PID	0.16

Source: EPD , Watershed Protection Branch, Wastewater Regulatory Program, 2019

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 11 summarizes the landfills located in the watershed of one listed segment in the Savannah River Basin.

Table 11. Landfills Upstream of 303(d) Listed Water Bodies in the Savannah River Basin

Name	County	Landfill Type	Permit No.	Status
Savannah River/Front River				
Georgia Power Co. – Plant Kraft Grumman Rd CCR Landfill	Chatham	CCR-LF	APL 0258	Permit Applied For
Georgia Power Co. – Plant McIntosh CCR Landfill No. 3	Effingham	CCR-LF	APL 0512	Permit Applied For
Georgia Power Co. – Plant McIntosh CCR Landfill No. 4	Effingham	CCR-LF	APL 0513	Permit Applied For
Georgia Power Co. – Plant McIntosh Ash Pond 1	Effingham	CCR-SI	APL 0511	Permit Applied For
Port Wentworth _ Augustine Creek	Chatham	L	025-046D(L)	Archived
Effingham Co - SR 119 W Sprgfld (L)	Effingham	L	051-007D(L)	Archived
Savannah Sugar-US 17 (LI)	Chatham	LI	025-018D(LI)	Operating
Ductile Iron of America (LI)	Chatham	LI	025-025D(LI)	Closed
Clifton Equipment Rental Company, Inc.	Chatham	LI	025-030D(L)	Closed

Name	County	Landfill Type	Permit No.	Status
E M Chemicals-O'Leary Rd (LI)	Chatham	LI	025-035D(LI)	Permit Revoked
Georgia Power Company Plant Kraft (LI)	Chatham	LI	025-061D(LI)	In-Closure
GPA-Hutchinson Island (L)	Chatham	LI	025-067D(L)	Closed
Centerpoint Garden City, LLC Landfill	Chatham	LI	025-071D(LI)	Released
Republic Services - Savannah Regional Industrial Landfill, Inc	Chatham	LI	025-072D(L)(I)	Operating
Georgia Power, Plant McIntosh (LI)	Effingham	LI	051-008D(LI)	Closed
Ft Howard Paper (LI)	Effingham	LI	051-009D(LI)	Operating
Georgia Power Company - Plant McIntosh Ash Monofill #4	Effingham	LI	051-010D(LI)	Operating
Garrett - Kelley Hill Rd Ph	Chatham	LI	APLI 0253	Permit Inactive

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

4.0 ANALYTICAL APPROACH

The process of developing bacteria TMDLs for the Savannah 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 those segments in which sufficient water quality data were collected to calculate at least one 30-day geometric mean above the regulatory standard, the loading curve approach was used. This method involves comparing the current critical load to summer and winter seasonal TMDL curves.

The available field measurements and water quality data used to develop the TMDL for this document were calculated using data from a nearby downstream USGS gauge. The nearby stream gauge had relatively similar watershed characteristics, including land use, slope, and drainage area. The stream flows were estimated by multiplying the gauged flow by the ratio of the listed stream drainage area to the gauged stream drainage area. One stream gauge, located on Kettle Creek, was used to estimate the flow. Table 12 below provides the USGS stream gauge used to estimate the flow for the listed stream segment.

Table 12. USGS Flow Gauge Located on the 303(d) Listed Segment in the Savannah River Basin

Name	Location	Station No.	USGS Station Name	Flow Gauge Drainage Area (sq mile)
Kettle Creek	Latitude 33.682628 Longitude -82.857923	02193340	Kettle Creek near Washington, GA	33.9

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 standards 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:

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

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 standard, 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 standard is 200 counts/100 mL. The second curve represents the winter TMDL for the period November through April when the 30-day geometric mean standard is 1,000 counts/100 mL. The equations for these two TMDL curves are:

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

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

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:

$$TMDL_{critical} = C_{standard} \times Q_{mean}$$

Where:

$TMDL_{critical}$ = critical bacteria TMDL load
$C_{standard}$ = seasonal bacteria standard (as a 30-day geometric mean)
summer - 200 counts/100 mL as fecal coliform
winter - 1,000 counts/ 100 mL as fecal coliform
<u>Upon the effective date of EPA's final approval of the proposed bacteria criteria</u>
summer - 126 counts/100 mL as E. coli
winter - 630 counts/ 100 mL as E. coli
Q_{mean} = stream flow as an arithmetic mean

A 30-day geometric mean load that plots above the respective seasonal TMDL curve represents an exceedance of the instream bacteria standard. 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 standard. There is also a single sample maximum criterion (4,000 counts per 100 milliliters for fecal coliform and 410 counts per 100 milliliters for E. coli) for the

months of November through April. 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. The percent load reduction can be expressed as follows:

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

The impaired segment of the Savannah River is tidal in nature. The flow regime 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:

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

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 standard. In this case, it is the seasonal fecal coliform bacteria standard. 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 fecal coliform bacteria, the TMDLs are expressed as counts per 30 days as a geometric mean.

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 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 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 include routine monitoring and reporting requirements.

There are eight facilities in the Savannah River Basin that discharge into or within 25 miles upstream of the listed segment. The maximum allocated bacteria load for these wastewater treatment facilities are given in the table below. The WLA load was calculated from the permitted flows and permitted bacteria concentrations. This was expressed as an accumulated load over a 30-day period and presented in units of counts per 30 days. If a facility expands its capacity and the permitted flow increases, the wasteload allocation for the facility would increase in proportion to the flow.

Table 13. WLAs for the Savannah River Basin

Facility Name	Permit No.	Receiving Stream	Listed Stream Segment	Bacterial Indictor	WLA (counts/30 days)
EMD Performance Materials Corp.	GA0034355	Savannah River	Savannah River/Front River GAR030601090320	Fecal coliform	4.99E10
				E. coli	3.14E10
City of Savannah (Travis Field WPCP)	GA0020427	Pipe Makers Canal	Savannah River/Front River GAR030601090320	Fecal Coliform	3.41E11
				E. coli	2.15E11
City of Savannah (Wilshire WPCP)	GA0020443	Savannah River	Savannah River/Front River GAR030601090320	Fecal Coliform	1.02E12
				E. coli	6.44E11
City of Savannah (President St. WRF)	GA0025348	Savannah River	Savannah River/Front River GAR030601090320	Fecal Coliform	6.13E12
				E. coli	3.86E12
City of Savannah (Crossroads WPCP)	GA0038326	Savannah River	Savannah River/Front River GAR030601090320	Fecal Coliform	6.81E11
				E. coli	4.29E11
Port Wentworth WPCP	GA0038814	Savannah River	Savannah River/Front River GAR030601090320	Fecal Coliform	5.22E10
				E. coli	3.29E10
City of Springfield (Springfield WPCP)	GA0020770	Savannah River	Savannah River/Front River GAR030601090320	Fecal Coliform	1.36E11
				E. coli	8.59E10
City of Rincon (Rincon WPCP)	GA0046442	Savannah River	Savannah River/Front River GAR030601090320	Fecal Coliform	2.61E10
				E. coli	1.64E10

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 (WLAsw) 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:

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

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

$Q_{WLAsw} = \Sigma Q_{urban} \times 0.7$

ΣQ_{urban} = Sum of all storm water runoff from MS4 urban

$C_{standard}$ = seasonal fecal coliform standard (as a 30-day geometric mean)

summer - 200 counts/100 mLas fecal coliform

winter - 1,000 counts/ 100 mL a fecal coliform

<u>Upon the effective date of EPA's final approval of the proposed bacteria criteria</u>

summer - 126 counts/100 mL as E. coli

winter - 630 counts/ 100 mL as E. coli

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 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

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 no wet or dry manure CAFOs located in the watersheds of the listed segments in the Savannah 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. 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.

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 Fecal Coliform 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 standard. In June 2018, 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. Pending EPA approval of the proposed criteria, this TMDL will use fecal coliform as the bacterial indicator; upon EPA's approval of the proposed E. coli and enterococci criteria, this TMDL will use these more appropriate bacteria indicators. The TMDL can be converted from fecal coliform to E. coli using a 0.63 conversion factor.

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

$TMDL_{summer}$ = 200 counts/100 mL (as a 30-day geometric mean) x Q

$TMDL_{winter}$ = 1,000 counts/100 mL (as a 30-day geometric mean) x Q

$TMDL_{winter}$ = 4,000 counts/100 mL (instantaneous) x Q

The total maximum daily seasonal E. coli loads for Georgia are given below:

$TMDL_{summer}$ = 126 counts/100 mL (as a 30-day geometric mean) x Q

$TMDL_{winter}$ = 630 counts/100 mL (as a 30-day geometric mean) x Q

$TMDL_{winter}$ = 410 counts/100 mL (instantaneous) x 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 fecal coliform standard and the mean 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, and a margin of safety (MOS). For these calculations, the fecal load contributed by a permitted facility to the WLA was not the maximum presented in Table 13, but rather was the product of the fecal coliform permitted 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 Savannah River Basin listed stream segment is presented in Table 14.

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. As a consequence of the localized nature of the load evaluations, the calculated fecal coliform 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 bacteria 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 TMDLs, the association between bacteria loads and the potential sources occurring within the sub-watershed of each segment was examined on a qualitative basis.

Table 14. Fecal Coliform Loads and Required Fecal Coliform 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)	
Kettle Creek (GAR030601050106)	Hobb Branch to Little Kettle Creek	Fecal coliform	3.88E12	--	--	8.54E11	9.49E10	9.49E11	76
		E. Coli	(3)	--	--	5.41E11	6.01E10	6.01E11	Undetermined (4)
Savannah River/Front River (GAR030601090320)	Ebenezer Creek to SR 25	Fecal coliform	1,750 x Q_{Total} (2)	3.17E9	200 x Q_{WLASW} (2)	200 x Q_{LA} (2)	20 x Q_{Total} (2)	200 x Q_{Total} (2)	43
		E. Coli	(3)	3.32E12	126 x Q_{WLASW} (2)	126 x Q_{LA} (2)	12.6 x Q_{Total} (2)	126 x Q_{Total} (2)	Undetermined (4)

Notes:
(1) The assigned fecal coliform load from the NPDES permitted facility for WLA was determined as the product of the fecal coliform permit limit and the facility average monthly discharge at the time of the critical load.
(2) The impaired segment of the Savannah 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) Sample was not analyzed for E. coli, therefore critical load calculation not possible
(4) Percent reduction could not be determined due to absence of 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 bacteria 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 bacteria water quality criteria so as 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 Savannah 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 a number of locations across the State each year. Sampling is conducted statewide by GA EPD personnel in Atlanta, 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 Fecal Coliform 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 standard criteria. These recommended management practices include:

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

- Ensure storm water management plans are in place and being implemented by the local governments located in the watershed;
- Implementation of recommended Water Quality management practices in the Coastal Georgia Regional Water Plan (GA EPD, 2017) and *Savannah-Upper Ogeechee 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 *Georgia Stormwater Management Manual* (ARC, 2016) 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 be in compliance with the conditions of their NPDES permit at all times. 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 fecal permit limits are monitored prior to discharge to the wetlands. 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, 2014). GA EPD will continue to work 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 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 amount 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 Savannah 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

Permitted discharges will be regulated through the NPDES permitting process described in this report. An allocation to a point source discharger will result in a permit limit or a monitoring requirement. Through its NPDES permitting process, GA EPD will determine whether a new or existing discharger has a potential of discharging bacteria levels equal to or greater than the total allocated load without treatment. The results of this analysis will determine the specific type of requirements in an individual facility's NPDES permit.

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 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 Savannah 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 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 Fecal Coliform Bacteria in the Savannah River Basin

Stream Segment	Location	Reach ID	Segment Length (miles)	Designated Use
Kettle Creek	Hobb Branch to Little Kettle Creek	GAR030601050106	6	Fishing
Savannah River/Front River	Ebenezer Creek to SR 25	GAR030601090320	28	Drinking Water, Coastal Fishing

The water use classification for the listed stream segments in the Savannah River Basin is Coastal Fishing, Fishing and Drinking Water. The criterion violated is listed as fecal coliform. The potential cause listed is nonpoint sources. Urban sources and municipal facilities should also be considered due to the presence of urbanized area and a municipal wastewater treatment plant within the listed segments watershed

In June 2018, 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. The use classification water quality standards for fecal coliform bacteria, 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, 2015), are:

(a) Drinking Water Supplies: Those waters approved as a source for public drinking water systems permitted or to be permitted by the Environmental Protection Division. Waters classified for drinking water supplies will also support the fishing use and any other use requiring water of a lower quality.
   (i) Bacteria: The provisions of paragraph 391-3-6-.03(6)(a)(i)1. shall apply until the effective date of EPA's final approval of the criteria specified in paragraph 391-3-6-.03(6)(a)(i)2.

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.

2. For the months of May through October, when water contact recreation activities are expected to occur, culturable E. coli not to exceed a geometric mean of 126 counts 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 E. coli statistical threshold value (STV) of 410 counts per 100 mL in the same 30-day interval. Should water quality and sanitary studies show E. coli levels from non-human sources exceed 126 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean E. coli shall not exceed 189 counts per 100 mL in lakes and reservoirs and 315 counts per 100 mL in free flowing freshwater streams. For the months of November through April, culturable E. coli not to exceed a geometric mean of 630 counts 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 E. coli statistical threshold value (STV) of 2050 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.

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

(iii) Bacteria: The provisions of paragraph 391-3-6-.03(6)(c)(iii)1. shall apply until the effective date of EPA's final approval of the criteria specified in paragraphs 391-3-6-.03(6)(c)(iii)2. and 391-3-6-.03(6)(c)(iii)3.

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. Estuarine waters: For the months of May through October, when water contact recreation activities are expected to occur, culturable enterococci not to exceed a geometric mean of 35 counts 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 counts per 100 mL the same 30-day interval. Should water quality and sanitary studies show enterococci levels from non-human sources exceed 35 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean enterococci shall not exceed 53 counts per 100 mL in lakes and reservoirs and 88 counts per 100 mL in free flowing freshwater streams. For the months of November through April, culturable enterococci not to exceed a geometric mean of 175 counts 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 650 counts per 100 mL the same 30-day interval.

3. All other fishing waters: For the months of May through October, when water contact recreation activities are expected to occur, culturable E. coli not to exceed a geometric mean of 126 counts 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 E. coli statistical threshold value (STV) of 410 counts per 100 mL in the same 30-day interval. Should water quality and sanitary studies show E coli levels from non-human sources

exceed 126 counts per 100 mL (geometric mean) occasionally, then the allowable geometric mean E. coli shall not exceed 189 counts per 100 mL in lakes and reservoirs and 315 counts per 100 mL in free flowing freshwater streams. For the months of November through April, culturable E. coli not to exceed a geometric mean of 630 counts 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 E. coli statistical threshold value (STV) of 2050 counts per 100 mL in the same 30-day interval.

4. 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.

5. 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.

(f) Coastal Fishing: This classification will be applicable to specific sites when so designated by the Environmental Protection Division. For waters designated as "Coastal Fishing", site specific criteria for dissolved oxygen will be assigned. All other criteria and uses for the fishing use classification will apply for coastal fishing.

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 storm water. 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, 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 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 storm water management plans are in place and being implemented by the local governments, and by the industrial facilities located in the watershed;
- 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, storm water, 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* (GA EPD, 2017) and the *Savannah-Upper Ogeechee Regional Water Plan* (GA EPD, 2017);Adoption of NRCS Conservation Practices for primarily agricultural lands;
- Application of Best Management Practices (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 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 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 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.

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: 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 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 water bodies 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 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.

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.

REFERENCES

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

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, 1998. *Savannah River Basin Management Plan 1998,* State of Georgia, Department of Natural Resources, Environmental Protection Division, Water Protection Branch.

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

GA EPD, 2017. *Savannah-Upper Ogeechee Regional Water Plan,* Adopted by GA EPD November 2011, Revised June 2017.

GA EPD, 2018. *State of Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6*, State of Georgia, Department of Natural Resources, Environmental Protection Division, Water Protection Branch, amended June 2018.

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

30-day Geometric Mean Fecal Coliform Monitoring Data

Water Quality Monitoring Stations

Stream Segment	Location	GA EPD Monitoring Station No.	Monitoring Station Description	Sample Date Range
Kettle Creek	Hobb Branch to Little Kettle Creek GAR030601050106	RV_01_144	Kettle Creek at Stone Ridge Road	2016
Savannah River/Front River	Ebenezer Creek to SR 25	RV_01_120	Savannah River - U.S. Highway 17 (Houlihan Bridge)	2012-2016

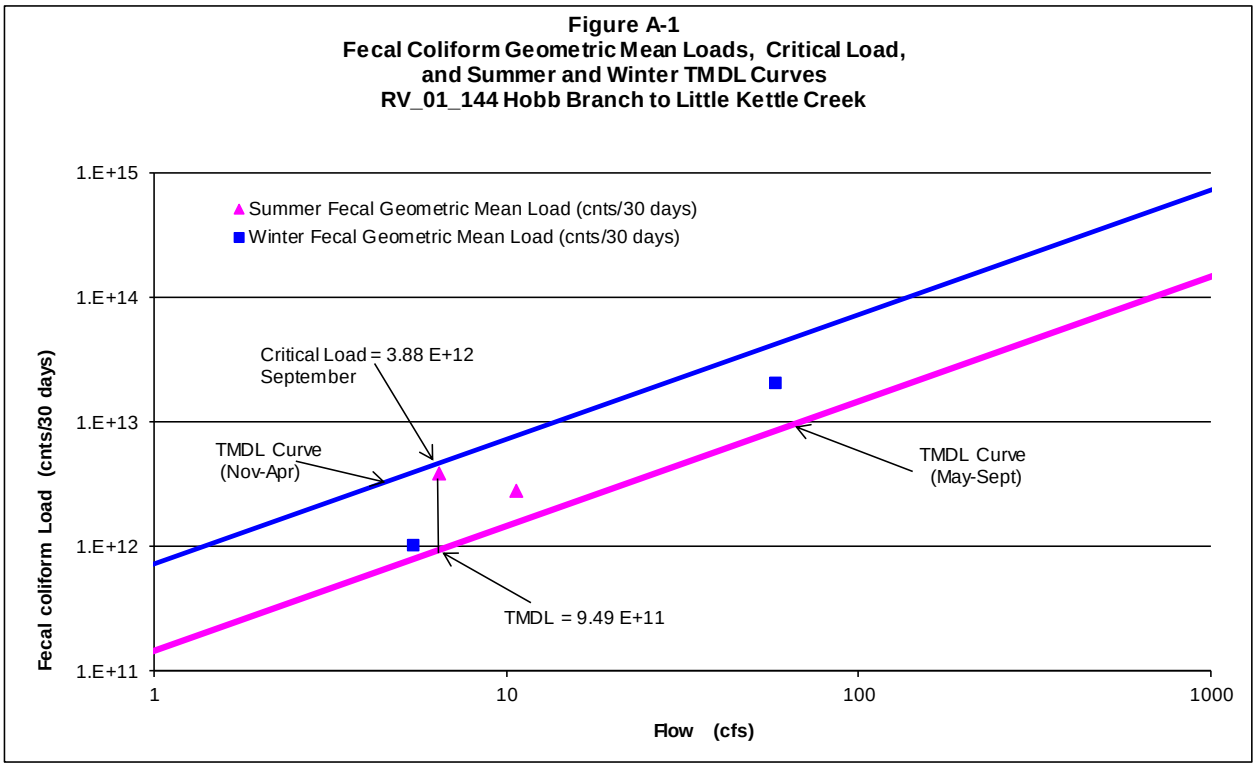

Table A-1. Data for Figure A-1

Date	Observed Fecal Coliform (counts/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)
Date	Fecal	Q	Geomean	Mean Flow	Current Load	TMDL
2/17/2014	300	47.7				
2/27/2014	130	22.6				
3/5/2014	1300	19.7				
3/17/2014	1000	144.4	475	58.6	2.04E+13	4.30E+13
5/20/2014	1100	15.9				
5/28/2014	300	10.9				
6/2/2014	300	10.7				
6/16/2014	170	5.0	360	10.6	2.81E+12	1.56E+12
8/28/2014	230	0.5				
9/4/2014	140	4.1				
9/16/2014	**17000**	**14.8**	**818**	**6.5**	**3.88E+12**	**9.49E+11**
12/9/2014	500	4.8				
12/11/2014	300	4.6				
12/15/2014	210	6.8				
12/17/2014	130	5.6	253	5.5	1.01E+12	4.00E+12

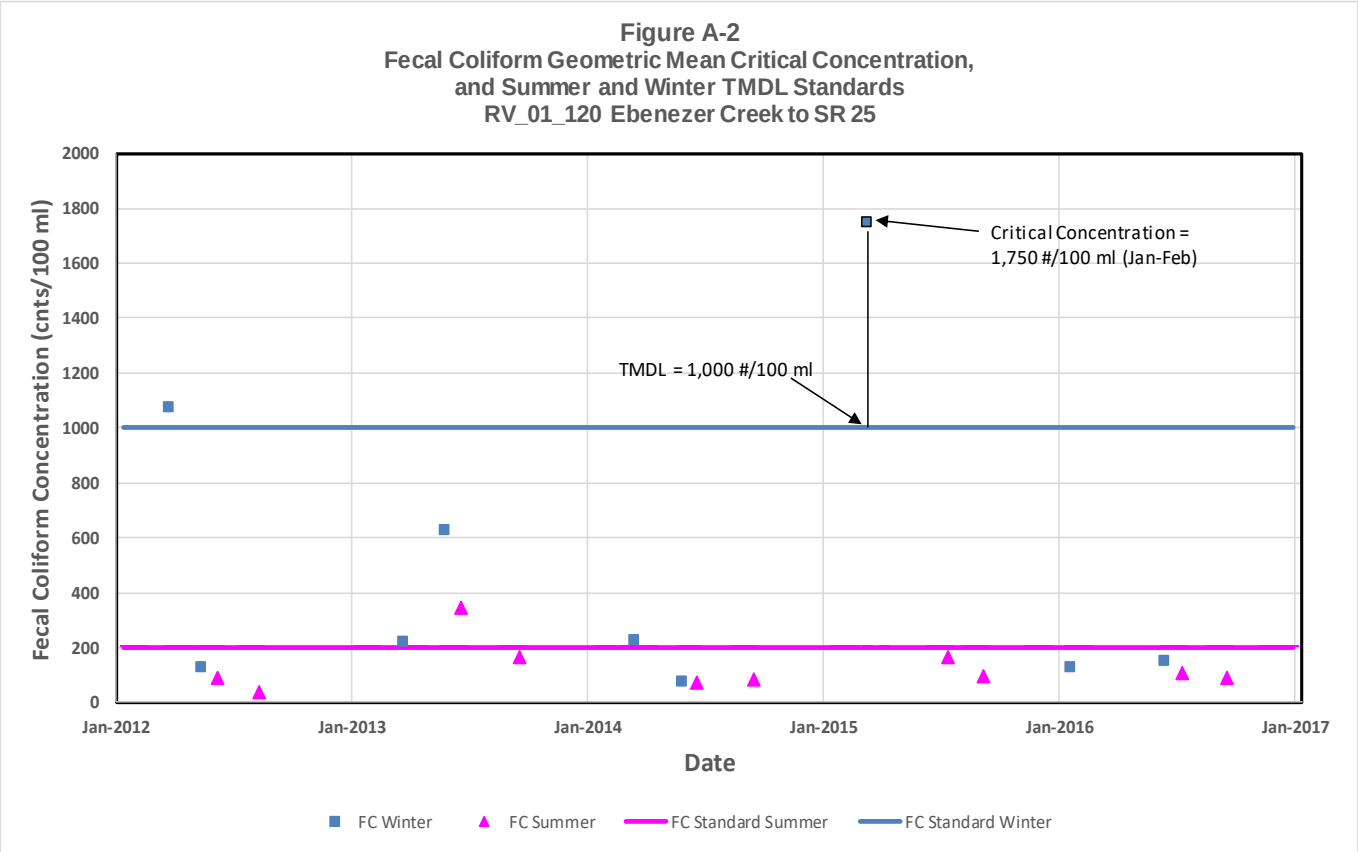
Figure A-2
Fecal Coliform Geometric Mean Critical Concentration,
and Summer and Winter TMDL Standards
RV_01_120 Ebenezer Creek to SR 25
Fecal Coliform Concentration (cnts/100 ml)
2000
1800
1600
1400
1200
1000
800
600
400
200
0
Critical Concentration =
1,750 #/100 ml (Jan-Feb)
TMDL = 1,000 #/100 ml
Jan-2012
Jan-2013
Jan-2014
Jan-2015
Jan-2016
Jan-2017
Date
FC Winter
FC Summer
FC Standard Summer
FC Standard Winter

Table A-2. Data for Figure A-2

Date	Fecal Coliform (#/100ml)	Fecal Coliform Standard (#/100ml)	Fecal Coliform Geomean (#/100ml)	% Reduction
1/12/2012	300	1000		
1/19/2012	50000	1000		
2/2/2012	300	1000		
2/9/2012	300	1000	1078	7
3/22/2012	90	1000		
4/5/2012	220	1000		
4/12/2012	130	1000		
4/19/2012	110	1000	130	-671
5/10/2012	130	200		
5/17/2012	80	200		
5/24/2012	20	200		
6/7/2012	300	200	89	-125
7/12/2012	40	200		
7/19/2012	220	200		
7/26/2012	80	200		
8/9/2012	170	200	40	-400
1/10/2013	130	1000		
1/17/2013	220	1000		
1/31/2013	800	1000		
2/7/2013	110	1000	224	-346
3/21/2013	50000	1000		
3/28/2013	500	1000		
4/4/2013	80	1000		
4/18/2013	80	1000	632	-58
5/23/2013	340	200		
5/30/2013	170	200		
6/6/2013	300	200		
6/20/2013	800	200	343	42
8/22/2013	70	200		
8/29/2013	500	200		
9/12/2013	130	200		
9/19/2013	170	200	167	-20
1/16/2014	170	1000		
2/3/2014	40	1000		
2/5/2014	230	1000		
2/26/2014	1700	1000	227	-340
3/13/2014	80	1000		
3/20/2014	300	1000		
4/3/2014	40	1000		
4/10/2014	40	1000	79	-1170
5/28/2014	230	200		
5/29/2014	50	200		
6/4/2014	60	200		
6/19/2014	40	200	72	-176
8/21/2014	70	200		
8/27/2014	20	200		
9/10/2014	260	200		
9/16/2014	130	200	83	-141
1/21/2015	1700	1000		
1/28/2015	800	1000		
2/11/2015	30000	1000		
2/18/2015	**230**	**1000**	**1750**	**43**
3/11/2015	270	1000		
4/8/2015	40	1000		
6/17/2015	20	200		
6/24/2015	3000	200		
7/8/2015	300	200		
7/15/2015	40	200	164	-22
8/12/2015	40	200		
8/19/2015	70	200		
8/26/2015	220	200		
9/9/2015	130	200	95	-111
11/18/2015	170	1000		
12/2/2015	90	1000		
12/9/2015	90	1000		
12/16/2015	200	1000	129	-676
1/20/2016	60	1000		
1/27/2016	80	1000		
2/3/2016	3000	1000		
2/17/2016	40	1000	155	-545
6/15/2016	20	200		
6/22/2016	110	200		
6/29/2016	500	200		
7/13/2016	110	200	105	-91
8/24/2016	40	200		
8/31/2016	110	200		
9/14/2016	800	200		
9/21/2016	20	200	92	-118
11/16/2016	500	1000		
11/30/2016	300	1000		
12/7/2016	1700	1000		
12/14/2016	240	1000	497	-101