

Bacteria TMDL for South Mayo River Patrick County, Virginia

Submitted by

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Executive Summary

This report presents the development of a Bacteria Total Maximum Daily Load (TMDL) for the South Mayo River watershed. The South Mayo River watershed is located in Patrick County in the Roanoke River Basin (USGS Hydrologic Unit Code 03010103). The waterbody identification code (WBID, Virginia Hydrologic Unit) for South Mayo River is VAW-L43R in the West Central region of Virginia.

The impaired segment is 5.77 miles in length. The upper limit is the Russell Creek mouth on the South Mayo River and extends downstream to the confluence of Spoon creek on the South Mayo River. (Note: The 1998 listed segment was erroneously assigned to watershed VAW-L45R. Changes in segment mileage are due to the use of the National Hydrography Dataset.)

The drainage area of the South Mayo River watershed is approximately 86.8 square miles. The average annual rainfall as recorded at Stuart, VA (~10 miles northwest of study area) is 51.53 inches. The watershed study area is approximately 56,000 acres, which is predominately forested (74 percent), with the majority of the remaining area in pasture land (22 percent). The remaining four percent of the watershed consists of residential areas, crop land, wetlands, and open water. A map of the distribution of land use in the watershed indicates that the pasture land tends to be located closer to the stream, while the forest land is farther from the stream. This is most likely due to the hilly topography of the watershed. The steeper slopes at the edges of the watershed have remained forested while the shallower slopes near the stream are used for agriculture.

South Mayo River was listed as impaired on Virginia's 1998 303(d) Total Maximum Daily Load Priority List and Report and the 2002 303(d) Report on Impaired Waters (VADEQ, 1998 & 2002) due to violations of the State's water quality standard for fecal coliform bacteria. Out of 18 samples collected during the 1998 assessment period, 5 violated the water quality standard at station 4ASMR016.09. During the most recent 2002 assessment period, 3 of 22 samples violated the water quality standard at station 4ASMR016.09.

According to Virginia Water Quality Standards (9 VAC 25-260-10A), "all state waters are designated for the following uses: recreational uses (e.g., swimming and boating); the propagation and growth of a balanced indigenous population of aquatic life, including game fish, which might be reasonably expected to inhabit them; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish)."

As indicated above, South Mayo River must support all designated uses and meet all applicable criteria. The South Mayo River does not currently support primary contact recreation.

The load-duration approach is used to develop the TMDL for the study watershed.

The assessment of bacterial sources involves estimating loads from various sources in the watershed. It was accomplished by determining the relative contribution by these sources using Biological Source Tracking (BST) methodology. A total of 12 ambient water quality samples were collected on a monthly basis from September 2002 through October 2003 for BST analysis. The results indicate that the majority of bacteria are coming from anthropogenic sources. Four categories of sources were considered: human, pet, livestock and wildlife. The analyses determined the relative contribution of all bacteria by these sources. The data indicated that on an average basis, relative contributions of bacteria are – 18.35% by human, 28.83% by pet, 34.42% by livestock, and 18.40% by wildlife. Fecal and *E.coli* bacteria were also enumerated as part of the BST analyses.

The bacteria loads in the study watershed were calculated for point source and non-point sources. The study area has one sewage treatment plant having an average discharge of ranging from 0.256 million gallons per day to 0.485 million gallons per day (MGD). The flows are within DEQ's permitted level of 0.60 MGD. The permitted loads were calculated by multiplying the permitted discharge concentration (126

cfu/100 ml) times the permitted flow times the appropriate unit conversions. For non-point sources (human, pets, livestock, and wildlife) total annual fecal productions were calculated separately. Data on population density and waste production by septic systems, pets, livestock and wildlife were collected from various sources, and total fecal productions were calculated with appropriate unit conversions.

The load-duration method essentially uses an entire stream flow record to provide insight into the flow conditions under which exceedances of the water quality standard occur. The flow-duration curve using historical flow data collected at the USGS gaging station (#02069700) was developed. The station was also the site for bacteria water quality sampling collected monthly for the study watershed. The load-duration curve was then developed by multiplying each flow level along the flow-duration curve by the applicable water quality standard and required unit conversions. Each water quality observation is then assigned to a flow interval by comparing the date of each water quality observation to the flow record of the reference stream. The stream flow from the date of the water quality observation is then used to calculate a stream flow and flow-duration interval for the stream. The loads on the load-duration curve are multiplied by 365 days/year to determine the annual loads. Fecal coliform data was converted to *E. Coli* using a translator equation developed based on the data sets from the DEQ's statewide monitoring network. The observed loads were plotted on the load-duration curve to determine the number and pattern of exceedances of water quality standards (TMDL).

The results indicated that the highest exceedance of the water quality standard occurred at a normal flow that has been exceeded approximately 65% of the time (~77 cfs). This represents the flow condition under which the largest bacteria reduction is required in order to meet water quality standards. The translated load at this flow condition is 8.94×10^{15} cfu/yr. To meet water quality standard of instantaneous *E. coli* of 235 cfu/100mL, this load would have to be reduced by 98% to an allowable load of 1.62×10^{14} cfu/yr. The allowable load is simply the *E. coli* standard multiplied by the applicable flow condition and the proper unit conversions.

For South Mayo River watershed, the average annual *E. coli* load is 1.46×10^{16} cfu/yr, and the TMDL under average annual flow conditions is 2.65×10^{14} cfu/yr. These values are used to calculate required reductions. By subtracting the waste load allocation (known value) from the TMDL (as computed), and the implicit margin of safety, the load allocation was determined. These values are presented in the following Table.

Table E1. Average annual *E. coli* loads and TMDL for South Mayo River watershed (cfu/yr)

WLA¹	LA	MOS	TMDL
1.04×10^{12}	2.640×10^{14}	(implicit)	2.650×10^{14}

¹ The point source permitted to discharge in the South Mayo River watershed are presented in section 5.2.

For South Mayo River, the WLA represents less than 0.4% of the TMDL load. The required reduction of 98% is to be applied to each of the four non-point sources identified in the BST analysis.

The South Mayo River TMDL development presented in this report is the first step toward the attainment of water quality standards. The second step is to develop a TMDL implementation plan, and the final step is the field implementation of the TMDL to attain water quality standards.

The Commonwealth intends for this TMDL to be implemented through a process of phased implementation of best management practices (BMPs). The development of South Mayo River TMDL requires a 98% reduction in non-point source loading in order to attain a 0% violation of water quality

standards. In order to evaluate interim reduction goals for a phased implementation plan, several reduction levels (82%, 70%, and 60%) and their associated violation rates were assessed. Reduction curves similar to the maximum exceedance/reduction curve were plotted and are presented in this report.

Results also indicate that approximately 68% of the violations occurred during times of precipitation and increasing stream flow or just after a precipitation event with stable or decreasing stream flow. This suggests that those violations could be related to runoff events. Among some of the BMPs effective in reducing bacteria runoff from such precipitation events include: riparian buffers zone, retention ponds/basins, range and pasture management, and animal waste management. Detailed lists of BMPs and their relative effectiveness will be included in the eventual TMDL implementation plan for the watershed.

The development of the South Mayo River TMDL would not have been possible without public participation. A public meeting was held in Stuart, Virginia on November 19, 2003 to discuss the process for TMDL development and the source assessment input. Twelve people attended. Copies of the presentation materials and the draft TMDL report were available for public distribution. The meeting was public noticed in the Virginia Register. There was a 30 day-public comment period and 0 written comment were received.

1. Introduction

Section 303(d) of the Clean Water Act and US Environmental Protection Agency's (EPA's) Water Quality Planning and Management Regulations (40 CFR Part 130) require states to develop Total Maximum Daily Loads (TMDLs) for waterbodies which are exceeding water quality standards. TMDLs represent the total pollutant loading that a waterbody can receive without violating water quality standards. The TMDL process establishes the allowable loadings of pollutants for a waterbody based on the relationship between pollution sources and in-stream water quality conditions. By following the TMDL process, states can establish water quality based controls to reduce pollution from both point and non-point sources to restore and maintain the quality of their water resources (EPA, 1991).

The Commonwealth of Virginia's (Virginia's) 1997 Water Quality Monitoring, Information, and Restoration Act (WQMIRA) codifies the requirement for the development of TMDLs for impaired waters. Specifically section § 62.1-44.19:7 C states:

"The plan required by subsection A shall, upon identification by the Board of impaired waters, establish a priority ranking for such waters, taking into account the severity of the pollution and the uses to be made of such waters. The Board shall develop and implement pursuant to a schedule total maximum daily loads of pollutants that may enter the water for each impaired water body as required by the Clean Water Act. "

The EPA specifies that in order for a TMDL to be considered complete and approvable, it must cover the following eight elements:

1. It must be designed to meet applicable water quality standards,
2. It must include a total allowable load as well as individual waste load allocations and load allocations,
3. It must consider the impacts of background pollution (in the case of South Mayo River this is wildlife),
4. It must consider critical environmental conditions or those conditions (stream flow, precipitation, temperature, etc.) which together can contribute to a worst-case exceedance of the water quality standard,
5. It must consider seasonal variations which together with the environmental variations can lead to a worst-case exceedance,
6. It must include an implicit or explicit margin of safety to account for uncertainties inherent in the TMDL development process,
7. It must allow adequate opportunity for public participation in the TMDL development process,
8. It must provide reasonable assurance that the TMDL can be met.

The following document details the development of a bacteria TMDL for South Mayo River which was listed as impaired on Virginia's 1998 303(d) Total Maximum Daily Load Priority List and Report and Virginia's 2002 303(d) Report on Impaired Waters. Approximately six miles of South Mayo River were listed as impaired due to a violation of Virginia's water quality standard for fecal coliform bacteria.

A glossary of terms used throughout this report is presented as Appendix A.

2. Physical Setting

2.1. Listed Water Bodies

South Mayo River is located in Patrick County in the Roanoke River Basin (USGS Hydrologic Unit Code 03010103). The waterbody identification code (WBID, Virginia Hydrologic Unit) for South Mayo River is VAW-L43R. The impaired segment is 5.77 miles in length. The upper limit is the Russell Creek mouth on the South Mayo River and extends downstream to the confluence of Spoon creek on the South Mayo River. *Note: The 1998 listed segment was erroneously assigned to watershed VAW-L45R. Changes in segment mileage are due to the use of the National Hydrography Dataset (NHD).* The South Mayo River watershed is outlined.

Figure 1. Map of the South Mayo River study area

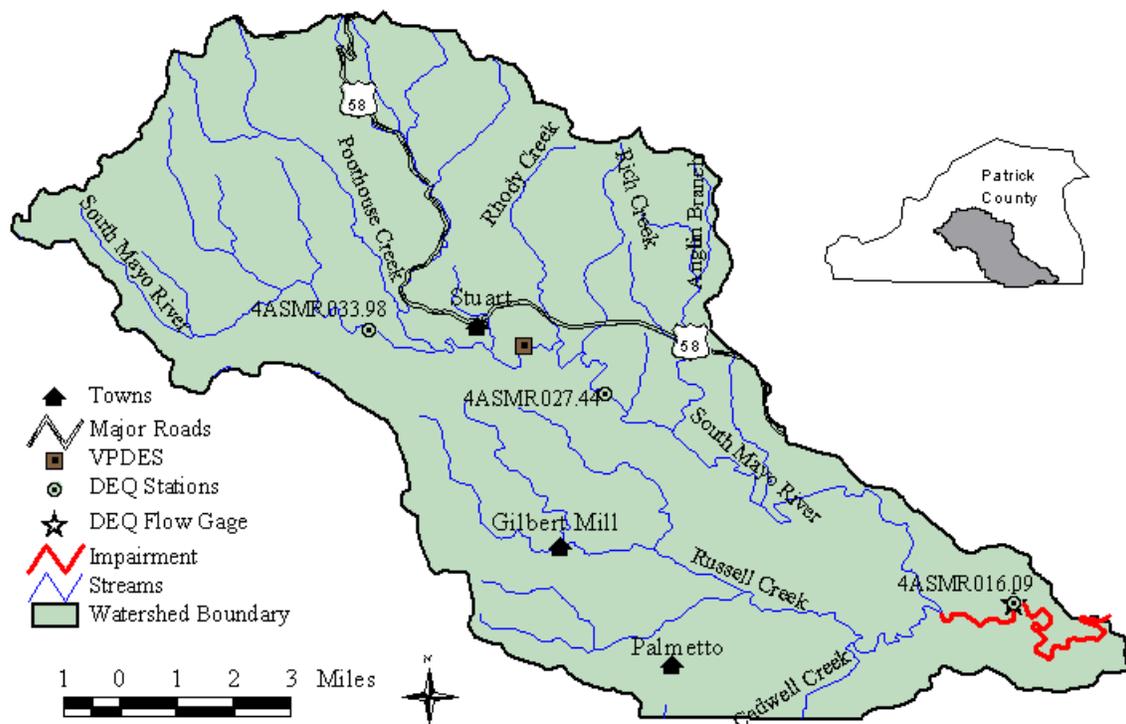


Table 1. Impaired segment description (South Mayo River)

Segment (segment ID)	Impairment (source of impairment)	Upstream Limit Description	Downstream Limit Description	Miles Affected
South Mayo River (VAW-L43R)	Fecal Colliform (NPS – Agriculture)	Russell Creek mouth on the South Mayo River	Confluence with Spoon Creek	5.77

2.2. Watershed

2.2.1. General Description

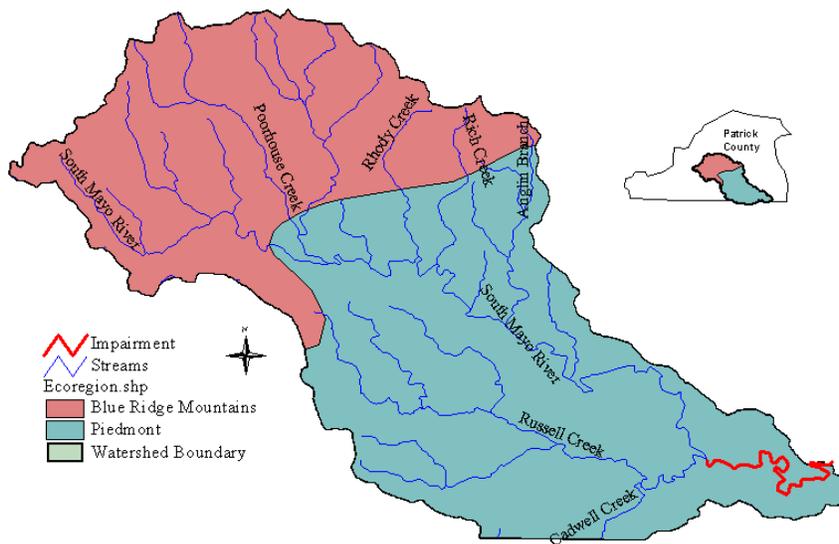
The South Mayo River watershed is located almost entirely within Patrick County, Virginia, with a small amount of the watershed located within Stokes County, North Carolina (707 acres, approximately 1.3% of the watershed). The South Mayo River watershed runs in a southeasterly direction. The watershed is approximately 16 miles long and 6 miles wide having an area of approximately 86.8 square miles.

The South Mayo River flows southeast from its headwaters on Rock Mountain, through the town of Stuart, then forms the Mayo River in Rockingham County, North Carolina. Eventually, the Mayo River enters the Dan River which is a major tributary of the Roanoke River, with the Roanoke River discharging into the Albemarle Sound.

2.2.2. Geology, Climate, Land Use

Geology and Soils

Figure 2. Major physiographic provinces within the South Mayo River watershed



South Mayo River is located in Patrick County within the Blue Ridge and Piedmont physiographic provinces (Figure 2). Topography varies sharply in the watershed, with elevations above seal level ranging from 274 (899 ft) to 919 (3015 ft) meters (Figure 3). Major soil groups in the region are shown in Figure 4 using the State Soil Geographic (STATSGO) Data Base (STATSCO, 1994). In general, soils with high infiltration rates and low runoff potential are located in the valley while soils with low infiltration rates and high runoff potential tend to be found along the ridges. The valley soils also tend to be better suited for general development, septic systems and agriculture than the ridges.

Figure 3. Elevation profile of the South Mayo River watershed

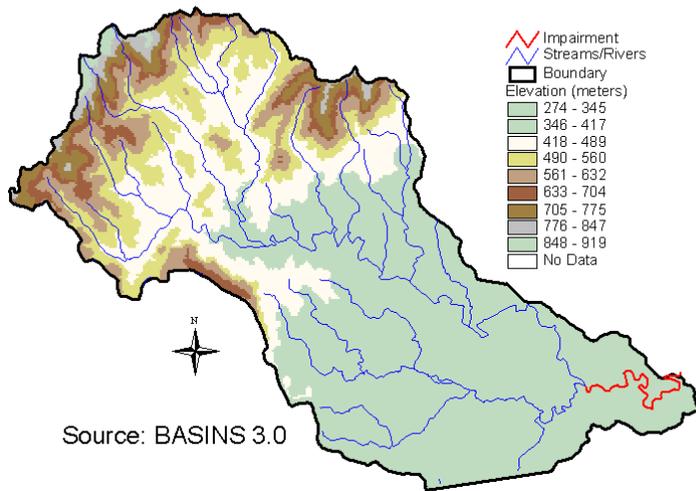
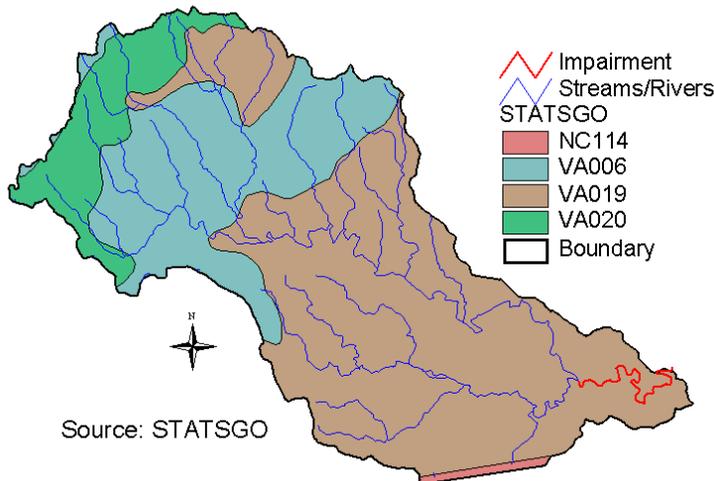


Figure 4. Major soil groups of the South Mayo River watershed



Climate

The drainage area of the South Mayo River watershed is approximately 86.8 square miles. The average annual rainfall as recorded at Stuart, Virginia (~10 miles northwest of study area) is 51.53 inches. Table 2 presented below provides a summary of climate data for the Stuart, Virginia weather station (Hydrodata 2001).

Table 2. Climate summary for Stuart, Virginia (8170)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average Max. Temperature (F)	45.28	49.22	58.16	68.74	76.33	82.53	85.94	84.6	78.16	68.44	58.67	48.75	66.72
Average Min. Temperature (F)	26.45	28.43	35.26	43.95	52.38	60.07	63.89	63.2	56.69	45.27	37.45	29.81	45.27
Average Total Precipitation (in.)	3.69	3.29	4.53	4.26	4.68	4.48	5.14	4.37	4.44	3.71	3.12	3.44	51.53

Land Use

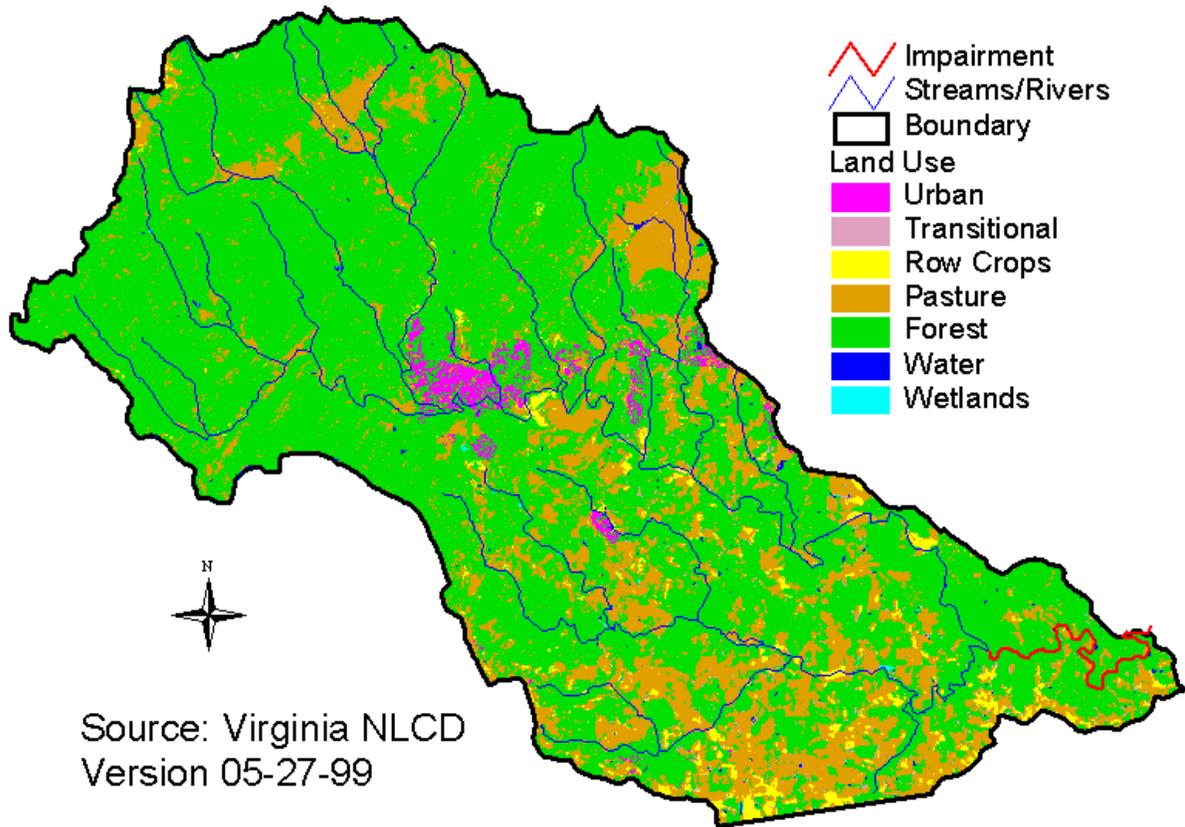
The South Mayo River watershed study area is approximately 56,000 acres, which is predominately forested (74 percent), with the majority of the remaining area in pasture land (22 percent). The remaining four percent of the watershed consists of residential areas, crop land, wetlands, and open water (Table 3). A map of the distribution of land use in the watershed (Figure 5) indicates that the pasture land tends to be located closer to the stream, while the forest land is farther from the stream. This is most likely due to the hilly topography of the watershed. The steeper slopes at the edges of the watershed have remained forested while the shallower slopes near the stream are used for agriculture.

Table 3. Land use in the South Mayo River watershed

Land Use Category	Area (acres)	Area (%)
Open Water	126.3	0.23
Low Intensity Residential	480.6	0.86
High Intensity Residential	8.5	0.02
High Intensity Commercial/Industrial	296.9	0.53
Transitional	408.3	0.73
Deciduous Forest	31183.5	56.06
Evergreen Forest	4065.6	7.31
Mixed Forest	5681.5	10.21
Pasture/Hay	12152.8	21.85
Row Crops	1171.1	2.11
Woody Wetlands	32.9	0.06
Emergent Herbaceous Wetlands	15.3	0.03
Total	55623.4	100.00

Source: Virginia National Land Cover Data (NLCD) Version 05-27-99

Figure 5. Land Use in the South Mayo River Watershed



3. Description of Water Quality Problem/Impairment

South Mayo River was listed as impaired on Virginia’s 1998 303(d) Total Maximum Daily Load Priority List and Report and 2002 303(d) Report on Impaired Waters (VADEQ, 1998 & 2002) due to violations of the State’s water quality standard for fecal coliform bacteria. Out of 18 samples collected during the 1998 assessment period, 5 samples exceeded the water quality standard for fecal coliform at station 4ASMR016.09. During the most recent 2002 assessment period, 3 of 22 samples exceeded the fecal coliform standard at station 4ASMR016.09. Station 4ASMR016.09 complete sampling record is highlighted in Table 4. Time series fecal coliform data and seasonal fecal coliform data found in figures 7 and 8, respectively.

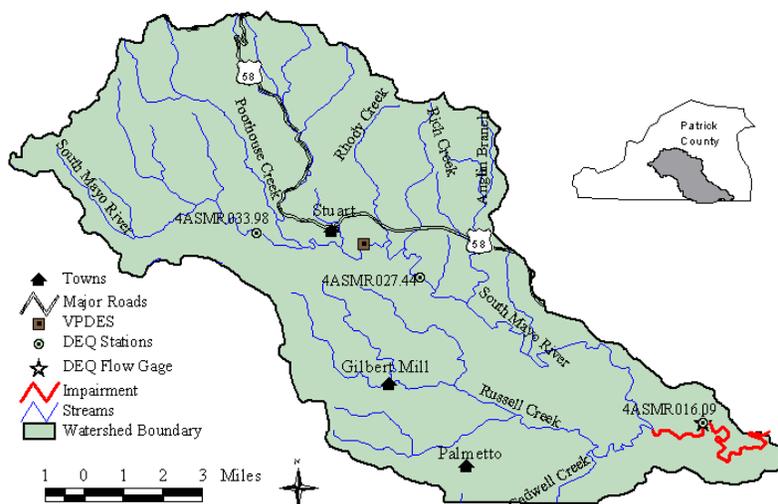
Table 4 presents a summary of all of the fecal coliform data collected by DEQ on the South Mayo River. The data collected during the 1970's show high levels of bacteria present in the streams. Present stations depict significant improvements in the watershed, however one station in the watershed is still exceeding water quality standards. The listing station for the current water quality impairment is 4ASMR016.09, which is depicted in the watershed map below (Figure 6).

Table 4. Fecal coliform data collected by DEQ on South Mayo River

Station	Date of First Sample	Date of Last Sample	Number of Samples	Average (cfu/100 ml)	Minimum (cfu/100 ml)	Maximum (cfu/100 ml)	Number of Exceedances*
4ASMR004.14	11/26/1996	05/14/2001	21	476	100	6800	1
4ASMR016.09	07/23/1979	10/07/2003	164	764	100	16000	20
4ASMR026.28	11/21/1989	11/21/1989	1	500	500	500	0
4ASMR027.18	11/21/1989	11/21/1989	1	700	700	700	0
4ASMR027.44	12/01/1970	06/25/2003	95	3732	100	65000	56
4ASMR032.08	12/01/1970	06/26/1979	84	1904	100	8000	35
4ASMR033.23	08/12/1992	08/12/1992	2	1500	1500	1500	1
4ASMR033.98	07/27/1988	06/25/2003	58	591	100	8000	8
4ASMR043.22	12/01/1970	06/26/1979	83	4216	100	65000	54
1998 305(b) Data (July 1, 1992 to June 30, 1997)							
4ASMR016.09	10/19/1992	04/02/1997	18	1083	100	8000	5
2002 305(b) Data (January 1, 1996 to December 31, 2000)							
4ASMR016.09	01/17/1996	11/08/2000	22	568	100	6500	3

* Exceedances of the then-applicable instantaneous standard of 1,000 cfu/100 mL

Figure 6. Map of South Mayo River watershed



A time series graph of the data collected at station 4ASMR016.09 from 1988 until 2003 is presented as Figure 7. The horizontal line at the 1000 cfu/100 ml mark represents the then-applicable instantaneous fecal coliform water quality standard. The data points above the 1000 cfu/100 ml line illustrate violations of the water quality standard.

Figure 7. Time series of fecal coliform concentrations (station 4ASMR016.09)

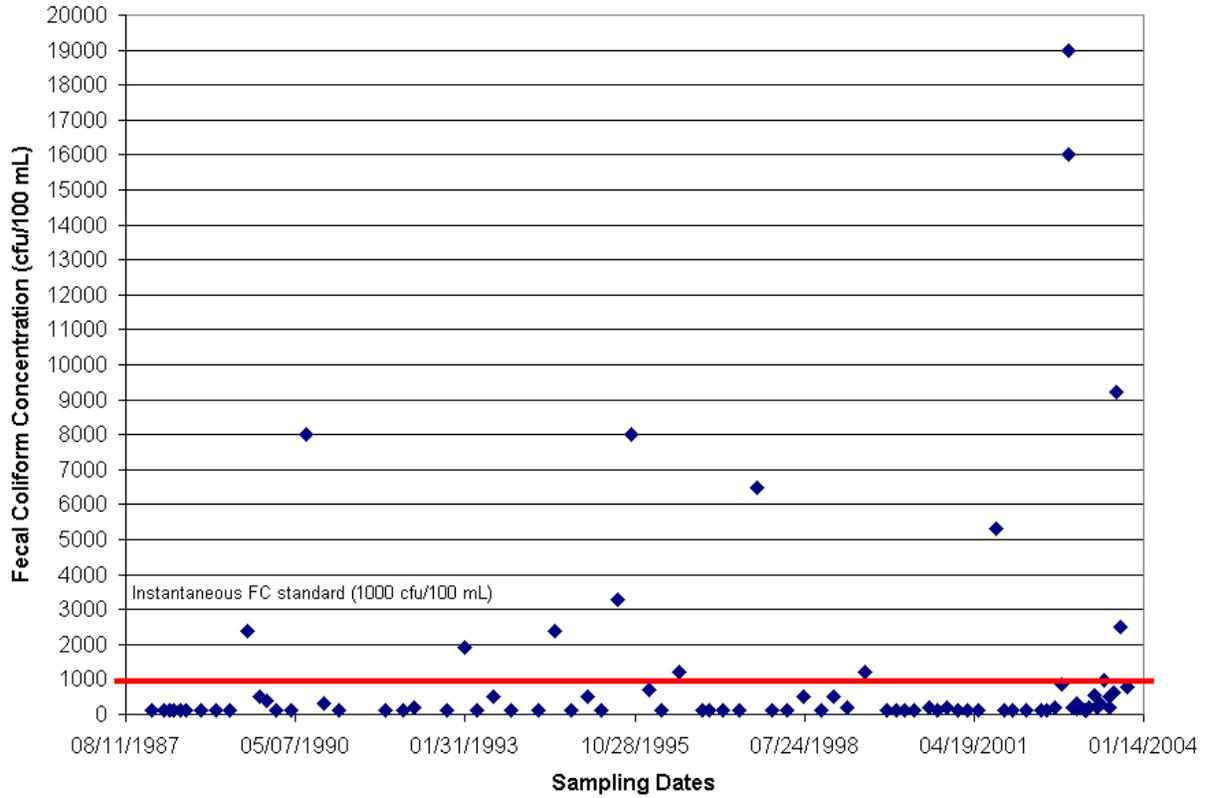
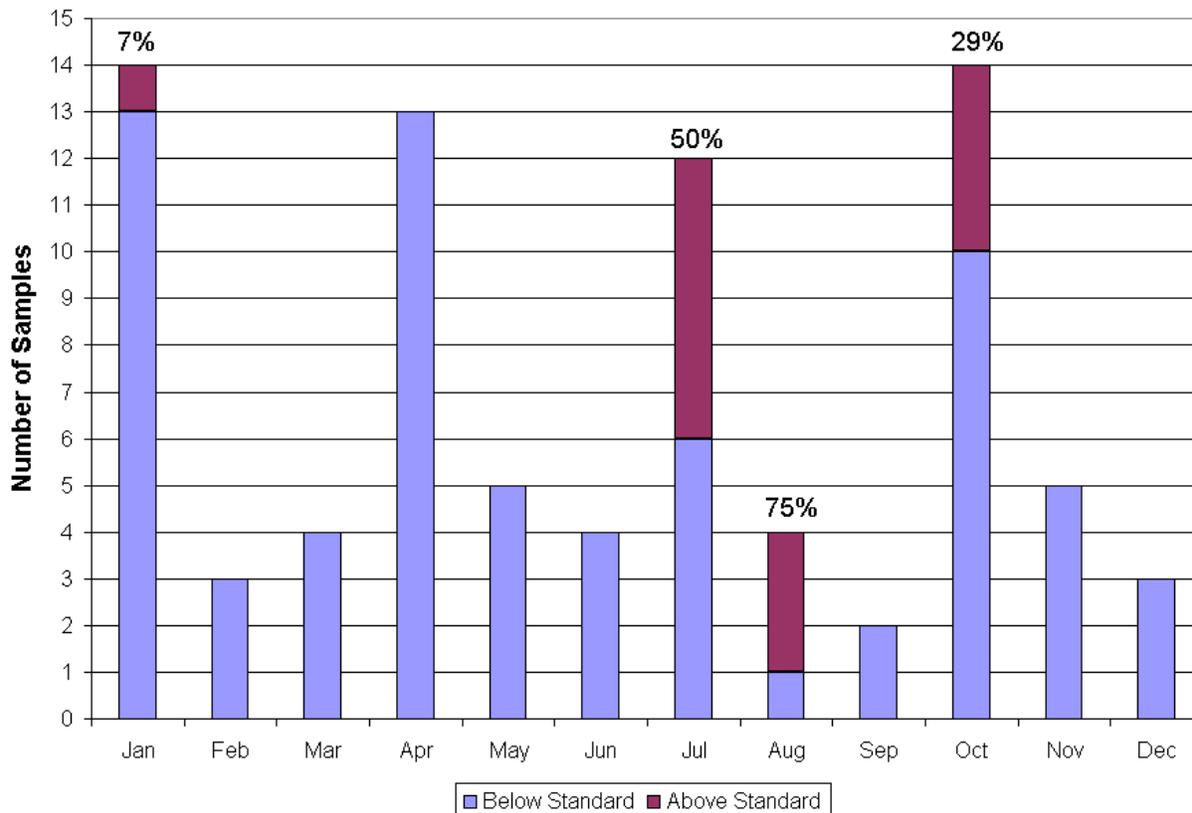


Figure 8 presents the distribution of water samples and exceedances (instantaneous fecal water quality standard - 1000 cfu/100mL) by month.

Figure 8. Distribution of fecal coliform samples and violations (station 4ASMR016.09)



4. Water Quality Standard

According to Virginia Water Quality Standards (9 VAC 25-260-5), the term “*water quality standards means provisions of state or federal law which consist of a designated use or uses for the waters of the Commonwealth and water quality criteria for such waters based upon such uses. Water quality standards are to protect the public health or welfare, enhance the quality of water and serve the purposes of the State Water Control Law (§62.1-44.2 et seq. of the Code of Virginia) and the federal Clean Water Act (33 USC §1251 et seq.)*.”

As stated above, Virginia water quality standards consist of a designated use or uses and a water quality criteria. These two parts of the applicable water quality standard are presented in the sections that follow.

4.1. Designated Uses

According to Virginia Water Quality Standards (9 VAC 25-260-10A), “*all state waters are designated for the following uses: recreational uses (e.g., swimming and boating); the propagation and growth of a balanced indigenous population of aquatic life, including game fish, which might be reasonably expected to inhabit them; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish)*.”

As stated above, South Mayo River must support all designated uses and meet all applicable criteria.

4.2. Applicable Water Quality Criteria

The applicable water quality criteria for bacteria in the South Mayo River watershed have changed since the initial listing on the 303(d) report. Following EPA recommendations, the Virginia Department of Environmental Quality (DEQ) proposed more stringent fecal coliform bacteria standards as well as new standards for *Escherichia coli* (*E. coli*) bacteria. These new standards were adopted by the State Water Control Board in May 2002, public noticed in June 2002, approved by the USEPA in November 2002, and were effective January 15, 2003.

The EPA recommendation that states adopt *E. coli* and enterococci (saltwater) standards stems from a stronger correlation between the concentration of *E. coli* and enterococci organisms and the incidence of gastrointestinal illness. *E. coli* and enterococci are both bacteriological organisms that can be found in the intestinal tract of warm-blooded animals. *E. coli* is a subset of fecal coliform group; thus a waterbody listed as implied for fecal coliform is considered to be listed for *E. coli* as well.

Although South Mayo River was listed as impaired due to a violation of the previous fecal coliform standard, the TMDL must be developed to meet the new *E. coli* bacteria standard. The interim fecal coliform bacteria standard presented below will not apply to this TMDL since 12 *E. coli* bacteria samples were collected as part of the bacteria source tracking study of the source assessment.

New Bacteria Standards

For a non-shellfish supporting water body such as South Mayo River to be in compliance with Virginia bacteria standards for primary contact recreational use, the DEQ specifies the following criteria (9 VAC 25-260-170):

1. *Fecal coliform bacteria shall not exceed a geometric mean of 200 fecal coliform bacteria per 100 ml of water for two or more samples over a calendar month nor shall more than 10% of the total samples taken during any calendar month exceed 400 fecal coliform bacteria per 100 ml of water. This criterion shall not apply for a sampling station after the bacterial indicators described in subdivision 2 of this subsection have a minimum of 12 data points or after June 30, 2008, whichever comes first.*

2. *E.coli and enterococci bacteria per 100 ml of water shall not exceed the following:*

Table 5. Applicable water quality standards

Parameter	Geometric Mean ¹ (cfu/100 ml)	Single Sample (cfu/100 ml)
<i>E.coli</i> (fresh water)	126	235
Enterococci (saltwater & Transition Zone 3)	35	104

¹ for two or more samples taken during a calendar month.

If the waterbody exceeded either criterion more than 10% of the time, the waterbody was classified as impaired and the development and implementation of a TMDL was indicated in order to bring the waterbody into compliance with the water quality criterion. Based on the sampling frequency, only one criterion was applied to a particular datum or data set (9 VAC 25-260-170). If the sampling frequency was one sample or less per 30 days, the instantaneous criterion was applied; for a higher sampling frequency, the geometric criterion was applied. These were the criteria used for listing the impairments included in this study. Sufficient fecal coliform bacteria standard violations were recorded at VADEQ water quality monitoring stations to indicate that the recreational use designations are not being supported.

For South Mayo River, the TMDL is required to meet the instantaneous criterion since the load-duration approach used to develop the TMDL for South Mayo River yields the maximum allowable bacteria concentration under any given flow condition. Unlike a continuous time series simulation, the flow duration approach does not yield daily bacteria concentrations which are needed to apply the geometric mean standard. Such an approach ensures that TMDLs, when implemented, do not result in violations under a wide variety of scenarios that affect bacteria loading.

5. Assessment of Bacteria Sources

The assessment of bacteria sources in traditional bacteria TMDL studies involves estimating loads from sources in the watershed and developing a computer model to establish the links between estimated loads and actual in-stream bacteria concentrations.

In a load-duration bacteria TMDL, source assessment is accomplished by determining the relative contribution by source of the fecal bacteria contained in a sample of stream water. This method of source identification is achieved through microbial source tracking (MST). MST methods that specifically use bacteria as the target organism are referred to collectively as bacteria source tracking (BST) methods. MST has been applied to study microbial ecology of environmental systems for years and are now being applied to help improve water quality by identifying problem sources and determining the effect of implemented remedial solutions. Management and remediation of water pollution would be more cost effective if the correct sources could be identified (Simpson, 2002).

To support BST analyses in load-duration TMDLs, bacteria loading in a watershed is also estimated. These load estimates are broken into point and non-point sources. It is important to note that the non-point source load estimates represent loading to the surface of the watershed; they are not estimates of in-stream loads.

The following sections present BST analysis and point- and non-point source load estimates.

5.1. Bacteria Source Tracking (BST)

Background

MST methods can be divided into three categories: molecular (genotype), biochemical (phenotype), and chemical. Molecular methods may offer the most precise identification of specific types of sources but are limited by high per-isolate costs and detailed and time-consuming procedures. They are not yet suitable for assaying large numbers of samples in a reasonable time frame. Biochemical methods (BST) may or may not be as precise, but are more simple, quicker, less costly, and allow large numbers of samples to be assayed in a short period of time (Hagedorn, 2002).

Several biochemical BST methods are in various stages of development. Among these are Antibiotic Resistance Analysis (ARA), F-Specific (F+ or FRNA) Coliphage, Sterols or Fatty Acid Analysis, Nutritional Patterns, and Fecal Bacteria Ratios. Of these, ARA has been chosen as the BST method for this TMDL report.

The ARA method uses fecal streptococcus (including the enterococci) and/or *E. coli* and patterns of antibiotic resistance for separation of sources. The premise is that human fecal bacteria will have the greatest resistance to antibiotics and that domestic and wildlife animal fecal bacteria will have significantly less resistance (but still different) to the battery of antibiotics and concentrations used. Most investigators are testing each isolate on 30 to 70+ antibiotic concentrations (Hagedorn, 2002). A more detailed description of the ARA method used by MapTech, Inc. in support of this TMDL is presented in Appendix B.

BST Sampling and Results

A total of 12 ambient water quality samples were collected by DEQ staff and submitted to MapTech, Inc. (MapTech) for BST analysis. The BST analyses performed by MapTech determined the relative contribution of overall bacteria by human, pet, livestock, and wildlife sources. Fecal and *E. coli* bacteria were also enumerated as part of the analyses performed by MapTech. Results of the South Mayo River BST sampling program are presented in Table 6.

Table 6. South Mayo River bacteria source tracking results

Sample Date	Fecal Coliform (cfu)	<i>E. coli</i> (cfu)	BST Distribution			
			Human	Pet	Livestock	Wildlife
09/18/2002	860	360	21%	54%	21%	4%
10/29/2002	19000	13000	13%	33%	54%	0%
11/25/2002	200	150	13%	25%	58%	4%
12/17/2002	170	140	25%	21%	38%	17%
01/29/2003	100	64	8%	29%	4%	58%
02/25/2003	200	94	8%	67%	0%	25%
03/31/2003	540	200	29%	21%	42%	8%
04/29/2003	330	200	21%	4%	42%	33%
05/28/2003	990	400	0%	13%	88%	0%
06/26/2003	500	260	13%	17%	54%	17%
07/22/2003	610	450	4%	42%	0%	54%
08/27/2003	2500	330	66%	21%	13%	0%
Average			18.35%	28.83%	34.42%	18.40%
Standard Deviation			0.17	0.18	0.27	0.21

The BST data results indicate that the majority bacteria are coming from anthropogenic sources. Approximately 82% of the bacteria found in the South Mayo River study comes from human, pet, or livestock sources.

5.2. Point Sources

Bacteria loading from point sources such as sewage treatment plants, small commercial establishments, schools, homes and businesses require permits under the Virginia Pollution Discharge Elimination System (VPDES) permit program. In order to consider all such point-source discharges in the South Mayo River watershed, the DEQ comprehensive environmental database and regional DEQ permit staff were queried. North Carolina Division of the Environment and Natural Resources (NCDENR) indicated that no permitted facilities were located in the portion of the watershed located in Stokes County, North Carolina. One bacteria point source discharge was identified in Stuart, Virginia.

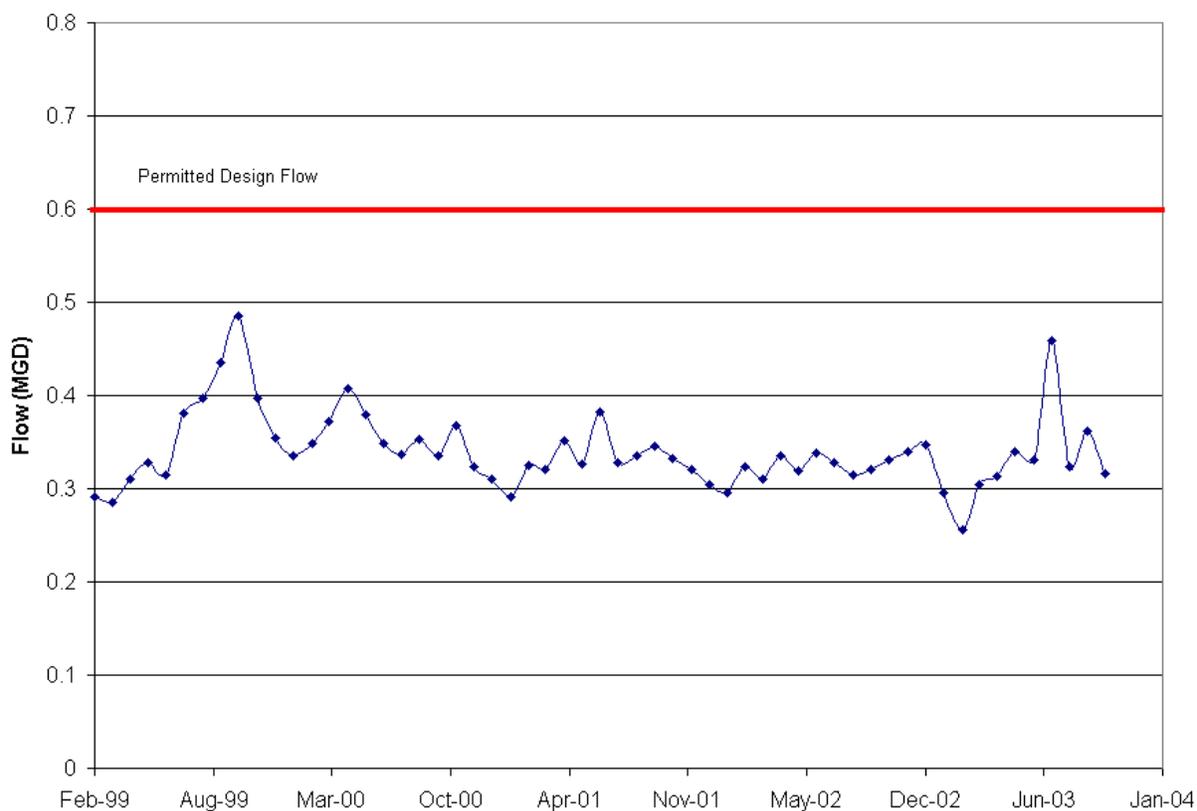
The one point source is covered under VPDES individual permits for sewage discharge for having greater than 1000 gallons per day. The permitted point source is presented in Table 7.

Table 7. VPDES point source facilities and loads

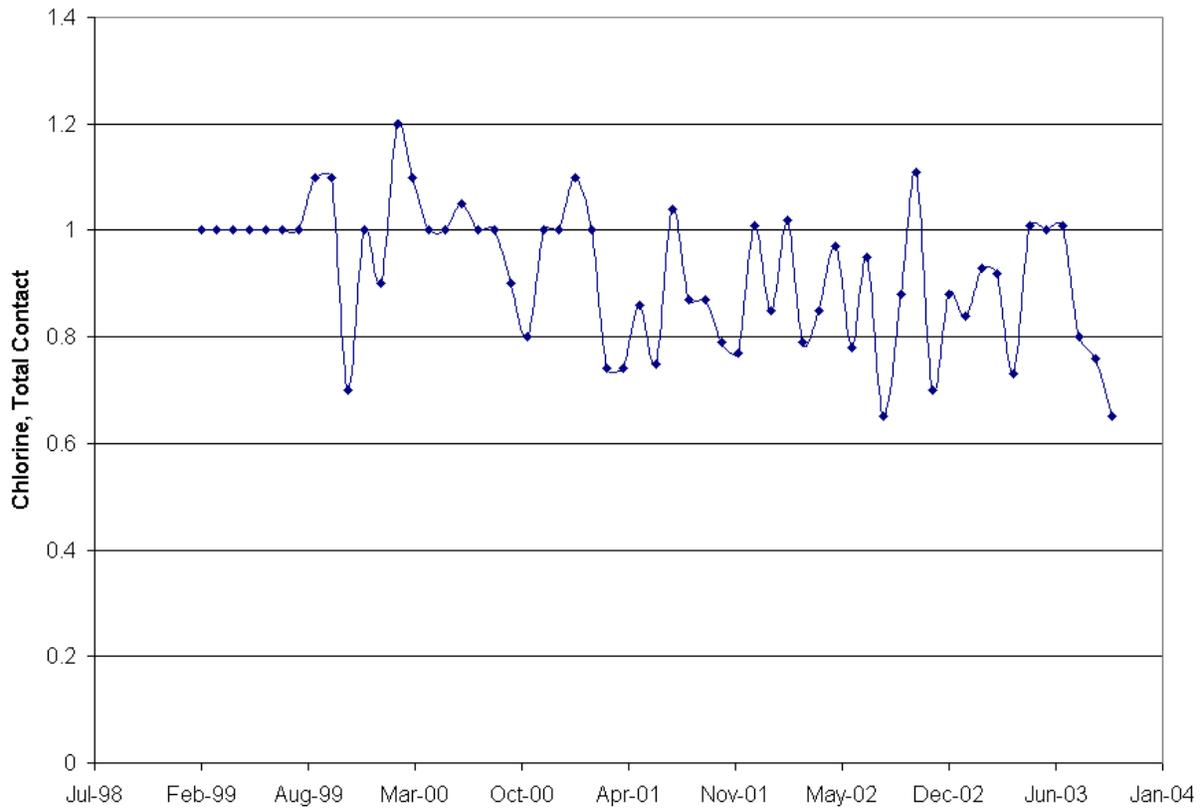
VPDES Permit Number	Facility Name	Receiving Stream	Watershed ID	Design Flow (MGD)	Effluent Limit (cfu/100 ml)	Wasteload Allocation
VA0022985	Stuart STP	South Mayo River	VAW-L45R	0.6	126	1.04×10^{12}
Existing WLA					N/A	
Expansion Matrix						
					Total x 2	2.08×10^{12}
					Total x 5	5.20×10^{12}

Permitted loads were calculated by multiplying the permitted discharge concentration (126 cfu/100 ml) times the design flow (0.6 MGD or 600,000 gal/day) times the appropriate unit conversions. The calculation is presented in Appendix C.

Figure 9. Stuart STP Average Daily Flow



The Stuart Sewage Treatment Plant (STP) is permitted to discharge an average of 600,000 gallons per day (gpd) or 0.6 million gallons per day (MGD). Figure 9 shows the variation of the Stuart STP flow from February 1999 until October 2003. The average daily flow ranged from 256,000 to 485,000 gpd (0.256 to 0.485 MGD). These flows are within DEQ permitted levels.

Figure 10. Stuart STP TRC Concentration

The Stuart STP uses chlorine to disinfect wastewater. Reported residual chlorine concentrations are presented in Figure 10. Chlorine concentration data from February 1999 until October 2003 indicate that total residual chlorine (TRC) concentrations ranged from 0.65 to 1.2 mg/L. This indicates that adequate disinfection was achieved at the plant.

5.3. Non-Point Sources

In order to gain an understanding of non-point source loading in the South Mayo River watershed, bacteria loads for typical non-point sources were estimated. These estimates were based upon animal and human population data sets, typical waste production rates and typical bacteria densities in waste products.

Currently published values for fecal bacteria production rates are primarily in terms of fecal coliform. There is little data on *E. coli* production; however, studies have shown that though minor variability will exist between sources, *E. coli* represents roughly 90-95% of fecal coliforms contained in "as-excreted" fecal material (Yagow, 2002). This implies that the relative bacteria contribution by source should remain constant.

It is important to note that the bacteria loads presented in the following sections on non-point sources represent "as-produced" loads. This is to say that some portion of an estimated load may not be available to be transported to South Mayo River in runoff.

5.3.1. Humans and Pets

Bacteria loading from human sources can come from straight pipes, failing septic systems, and land-applied biosolids. Failing septic systems are typically manifested by effluent discharging to the ground surface where the bacteria laden effluent is then available to be washed into a stream as runoff during a precipitation event. In contrast, discharges from straight pipes are typically directly deposited to streams.

All biosolids can contain a certain concentration of fecal bacteria. When biosolids are applied to the land surface, the potential exists for a portion of these fecal bacteria to be transported to a stream as runoff during storm events.

Straight Pipes

The Patrick County District office of the VDH reported no known straight pipes in the South Mayo River Watershed.

Septic Systems

Based on 2000 U.S. Census data, the South Mayo River watershed is populated by approximately 4,772 residents living in approximately 1,988 households. The Stuart STP serves approximately 1000 residents. It is assumed that all remaining households are served by septic systems.

Based on the estimated population and number of households, there are an average of 2.4 people per household in the South Mayo River watershed. An estimated 417 households are connected to the Stuart STP and the remaining 1571 households use septic systems. Assuming a wastewater production rate of 75 gallons per day per person (Geldreich, 1978), and a fecal coliform density in septic tank waste of 1.04×10^6 cfu per 100 mL (MapTech, 2002), the total septic load in the South Mayo River watershed is estimated to be 4.08×10^{15} cfu per year. Of this total septic load, only the load from failing septic systems would be available as runoff. Septic systems failure rates depend largely on the age of the septic system. Based on previous TMDL studies it is estimated that septic systems in a watershed fail at rate between 5% and 15%.

Biosolids

In the Commonwealth of Virginia, the VDH and the DEQ regulate biosolids generation and application to the land surface. The DEQ regulates the generation of biosolids and the land application of those biosolids by the generator. The VDH regulates contractors who transport and spread biosolids; the biosolids can be from in-state or out-of-state sources.

The DEQ comprehensive environmental database was queried for biosolids application permits in the South Mayo River watershed, and only the Stuart STP applies biosolids. On average the Stuart STP land applies 166.65 dry tons of biosolids in the watershed. These biosolids have 112.6 acres of agricultural fields, which are permitted for land application (68.7 acres of corn and 43.9 acres of hay).

Pets

The number of pets in the watershed was estimated based on the number of households. Assuming an average of 1.7 dogs and 2.1 cats per household (National Pet Owner Survey, American Pet Products Manufacturers Association, 2001-2002), the estimated pet population in the South Mayo River watershed consists of 3380 dogs and 4175 cats. Using the waste production rates and fecal coliform densities from MapTech, 2002, the total bacteria loads from dogs and cats in the South Mayo River watershed are 2.67×10^{14} and 2.66×10^8 cfu per year, respectively. Table 8 presents the calculation of human and pet loads in the watershed. It should be noted that the numbers presented in Table 8 represent loads available for runoff and not in-stream loads.

Table 8. Estimated fecal coliform production from humans and pets in the South Mayo River watershed

Source	Population	Waste Production Rate	Waste Fecal Coliform Density	Total Est. Annual Fecal Production
Failing Septic Systems	10% x 1571 systems x 2.4 people/system = 377.04 people	75 gal/day/person x 37.85412 100mL/gal x 365 days/yr = 1.04 x 10 ⁶ 100mL/yr/person *	1.04 x 10 ⁶ cfu/100mL *	4.08 x 10 ¹⁴ cfu/yr
Dogs	3380 dogs	450 g/dog **	4.8 x 10 ⁵ cfu/g **	2.67 x 10 ¹⁴ cfu/yr
Cats	4175 cats	19.4 g/cat **	9 cfu/g **	2.66 x 10 ⁸ cfu/yr

* Geldreich, 1978. A conversion factor of 37.85412 was used to convert gallons to 100mL.

** MapTech, 2002 (Gills Creek TMDL Report).

5.3.2. Livestock

Fecal matter from livestock can be deposited directly to the stream in instances where livestock have stream access, or the fecal matter can be transported to the stream in surface runoff from grazing or pasture lands.

The predominant types of livestock in the South Mayo River watershed are cattle and horses, although all types of livestock were considered in developing the TMDL. 1997 Census of Agriculture data for Patrick County were used to estimate the livestock population in the watershed (<http://govinfo.library.orst.edu/php/agri/area.php>). The South Mayo River watershed is located almost entirely within Patrick County and contains approximately 25% of the total pasture land in the county as determined by GIS analysis. Table 9 presents the livestock population estimates, fecal production rates, and estimated annual fecal loads in the watershed. It should be noted that the numbers presented in Table 9 represent loads available for runoff and not in-stream loads.

Table 9. Estimated annual fecal coliform production from livestock in the South Mayo River watershed

Source	Population*		Waste Production Rate** (lbs/animal/day)	Fecal Density** (cfu/g)	Total Fecal Production*** (cfu/yr)
	Patrick County	South Mayo River			
Beef Cows	6,697	1,674	46.4	1.01 x 10 ⁵	1.30 x 10 ¹⁵
Milk Cows	1,388	347	120.4	2.58 x 10 ⁵	1.79 x 10 ¹⁵
Sheep	207	52	2.4	4.30 x 10 ⁴	8.89 x 10 ¹¹
Horses	372	93	51.0	9.40 x 10 ⁴	7.38 x 10 ¹³

* The livestock population in the South Mayo River watershed was estimated as 25% of the County livestock population.

** MapTech, 2002.

*** A conversion factor of 453.6 was used to convert pounds to grams.

5.3.3. Wildlife

Like livestock, fecal matter from wildlife can be either deposited directly to the stream, or it can be transported to the stream in surface runoff from woods, pastureland and cropland. Direct deposition to streams varies with species, e.g. beaver spend most of their time in water; therefore most of their fecal matter would be directly deposited to the stream.

Wildlife populations in the South Mayo River watershed were estimated based on wildlife densities used in developing the Gills Creek TMDL. The use of the Gills Creek TMDL wildlife densities was deemed appropriate by the Department of Game and Inland Fisheries (Norman, 1999). Habitat was assigned as follows:

- deer: all land use categories
- turkey: deciduous forest, evergreen forest, mixed forest
- muskrat: woody wetlands, emergent herbaceous wetlands, open water
- beaver: stream miles
- raccoon: low intensity residential, deciduous forest, evergreen forest, mixed forest, woody wetlands, row crops
- goose: pasture/hay, row crops, emergent herbaceous wetlands, open water
- mallard: woody wetlands, emergent herbaceous wetlands, open water

Table 10. Estimated fecal coliform production from wildlife in the South Mayo River watershed

Source	Population Density ^c	Habitat	Watershed Population (animals)	Range of Waste Production Rate (cfu/an/day)		Range or Fecal Coliform Production (cfu/yr)	
				Low	High	Low	High
Deer	0.084 an/ac	55,623.4 ac	4672	1.52 x 10 ⁸	3.60 x 10 ⁸	2.59 x 10 ¹⁴	6.14 x 10 ¹⁴
Turkey	0.010 an/ac	40,930.6 ac	409	9.3 x 10 ⁷		1.39 x 10 ¹³	
Muskrat	2.751 an/ac	174.5 ac	480	2.50 X 10 ⁷	1.90 X 10 ⁸	4.38 x 10 ¹²	3.33 x 10 ¹³
Beaver	4.800 an/mi	131 mi	629	3.00 x 10 ⁶		6.89 x 10 ¹¹	
Raccoon	0.070 an/ac	42615.2 ac	2983	2.05 x 10 ⁷	9.45 X 10 ⁸	2.23 x 10 ¹³	1.03 x 10 ¹⁵
Goose	0.004 an/ac	13,465 ac	54	5.87 x 10 ⁴	2.25 x 10 ⁹	1.16 x 10 ⁹	4.43 x 10 ¹³
Mallard	0.002 an/ac	174.5 ac	1	2.43 x 10 ⁹		8.87 x 10 ¹¹	
Total						3.01 x 10 ¹⁴	1.74 x 10 ¹⁵

¹VADCR, 2000

6. TMDL Development

One of the major obstacles to improving stream water quality is that the potential sources of bacteria are numerous and the dominant sources and/or pathways are generally unknown. This can make it difficult to direct effective cleanup efforts.

Typical pathogen TMDLs are completed by developing watershed-based computer simulations that establish links between sources and in-stream water quality. While effective, the effort required to develop modeled TMDLs can be costly. In an effort to complete pathogen TMDLs in a timely and cost-effective manner, the use of load-duration analyses has been investigated. It has been determined that the load-duration method of calculating a TMDL produces a result only slightly more conservative than if the TMDL had been determined through computer modeling.

The load duration method essentially uses an entire stream flow record to provide insight into the flow conditions under which exceedances of the water quality standard occur. Exceedances that occur under low flow conditions are generally attributed to loads delivered directly to the stream such as straight pipes and livestock with access to the stream. Exceedances that occur under high flow conditions are typically attributed to loads that are delivered to the stream in stormwater runoff. Exceedances occurring under during normal flows can be attributed to a combination of runoff and direct deposits.

The following sections detail the development of the load-duration TMDL and associated allocations.

6.1. Load-Duration Curve

Development of a load-duration curve begins with a flow-duration curve, and in order to develop a meaningful flow-duration curve one must have several years of flow data for the target stream or river. Where very little flow data exists for a target stream, a reference stream with the requisite flow measurements must be used similar to the paired watershed approach used in watershed-based modeling. In the case of South Mayo River, the United State Geological Survey (USGS) and DEQ operate a stream gage that is co-located with the DEQ water quality monitoring station.

The following sections detail the flow data for South Mayo River, the development of a flow-duration curve for South Mayo River, and the creation of a load-duration curve for South Mayo River.

6.1.1. Flow Data

The USGS stream gage #02069700 has 40 years of published data, from October 1, 1962 to September 30, 2002. Daily provisional flow data is available from October 1, 2002 until November 1, 2003. Daily average flows measurements were available. This stream gage is located at the Route 700 bridge near Nettleridge, Virginia.

6.1.2. Flow-Duration Curves

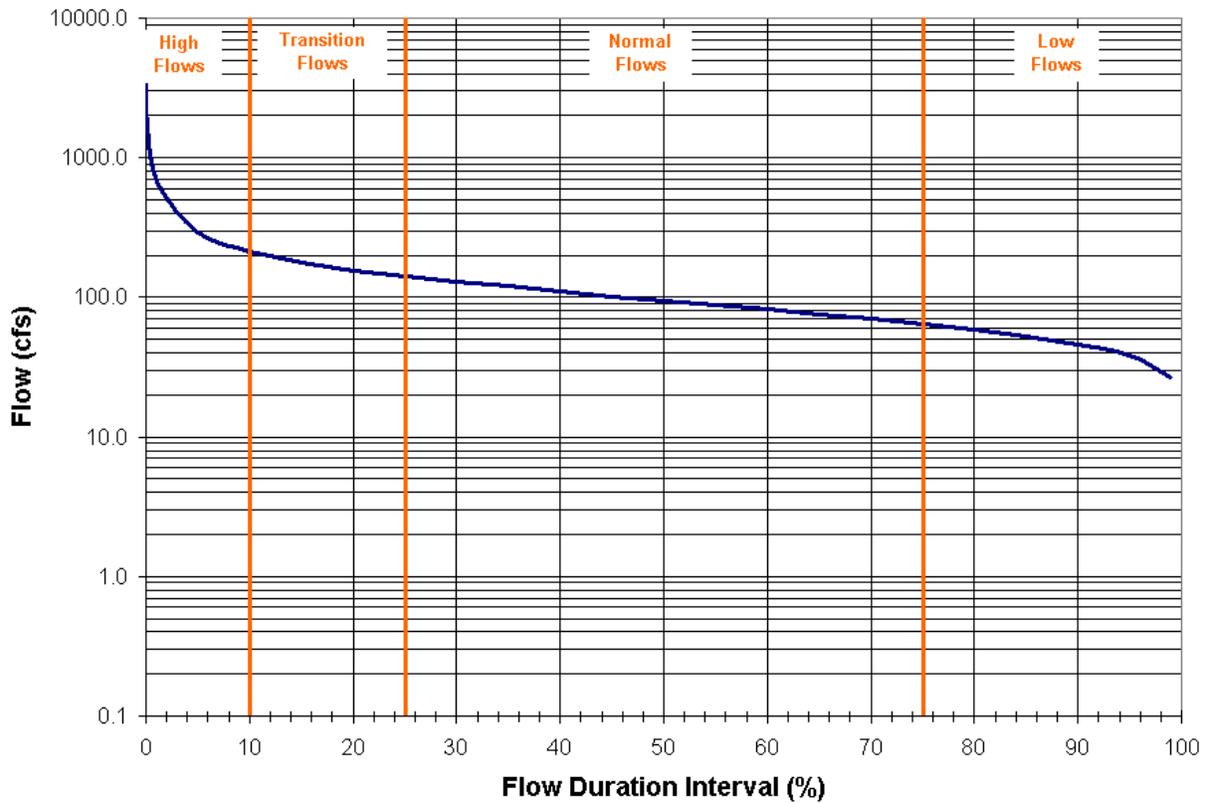
In order to use the load-duration method to develop a TMDL, a flow-duration curve must be developed for the impaired stream. This is accomplished by first developing a flow-duration curve for the reference.

A flow-duration curve is a plot showing the flow magnitude (cfs) along the "y" axis and the frequency of daily average stream flow (%) along the "x" axis. For example, the flow value corresponding to "1%" is the flow that has been exceeded only 1% of the time for which measurements exist. Likewise, the flow value corresponding to "30%" is the flow that 30% of the historic record exceeds.

To plot the flow values for the period of record of the reference stream, the PERCENTILE statistic function of Excel was used. The resulting percentile of a given flow was then subtracted from 1 to yield the percent of time that a given flow is exceeded by the flows of record. The flow duration interval values were plotted with the corresponding flows to yield a log/normal flow duration curve. The flow-duration curve for South Mayo River is presented as Figure 11.

The flow-duration curve for South Mayo River has been divided into four sections to help illustrate flow conditions. These sections are titled "High Flows", "Transition Flows", "Normal Flows", and "Low Flows". Low flows can be roughly equated to near-drought or drought flows. High flows are near-flood or flood flows. Transition flows are, as implied, neither normal nor high.

Figure 11. Flow-duration curve for South Mayo River near Nettleridge, VA (USGS#02069700)



6.1.3. Load-Duration Curve

As mentioned in Section 3, the violations of the bacteria water quality standards on the South Mayo River were collected at Station 4ASMR016.09, which is also the location of the USGS flow station.

A load-duration curve is developed by multiplying each flow level along the flow-duration curve by the applicable water quality standard and required unit conversions. The resulting curve represents the maximum allowable load at each flow level, in other words, the Total Maximum Daily Load (TMDL). Since the TMDL and required reductions must be in terms of an average annual stream flow, the loads on the load-duration curve are multiplied by 365 days/year and presented as annual loads.

In order to plot existing fecal coliform (FC) data against the *E. coli* (EC) standard/TMDL line, it was necessary to translate the FC data to EC data. Translation of FC data to EC data was achieved by using a translator equation developed from a regression analysis of 493 paired FC/EC data sets from the DEQ's statewide monitoring network. The translator equation resulting from the regression analysis is presented below:

$$\text{EC log}_2 = -0.0172 + 0.91905 * \text{FC log}_2$$

By plotting these observed loads on the load-duration curve, the number and pattern of exceedances of the water quality standard (TMDL) can be analyzed. The load duration curve and observed data for South Mayo River are shown in Figure 12. The TMDL line has been plotted for the instantaneous *E. coli* standard of 235 cfu/100mL.

Figure 12. Load duration curve and observed data for South Mayo River at station 4ASMR016.09

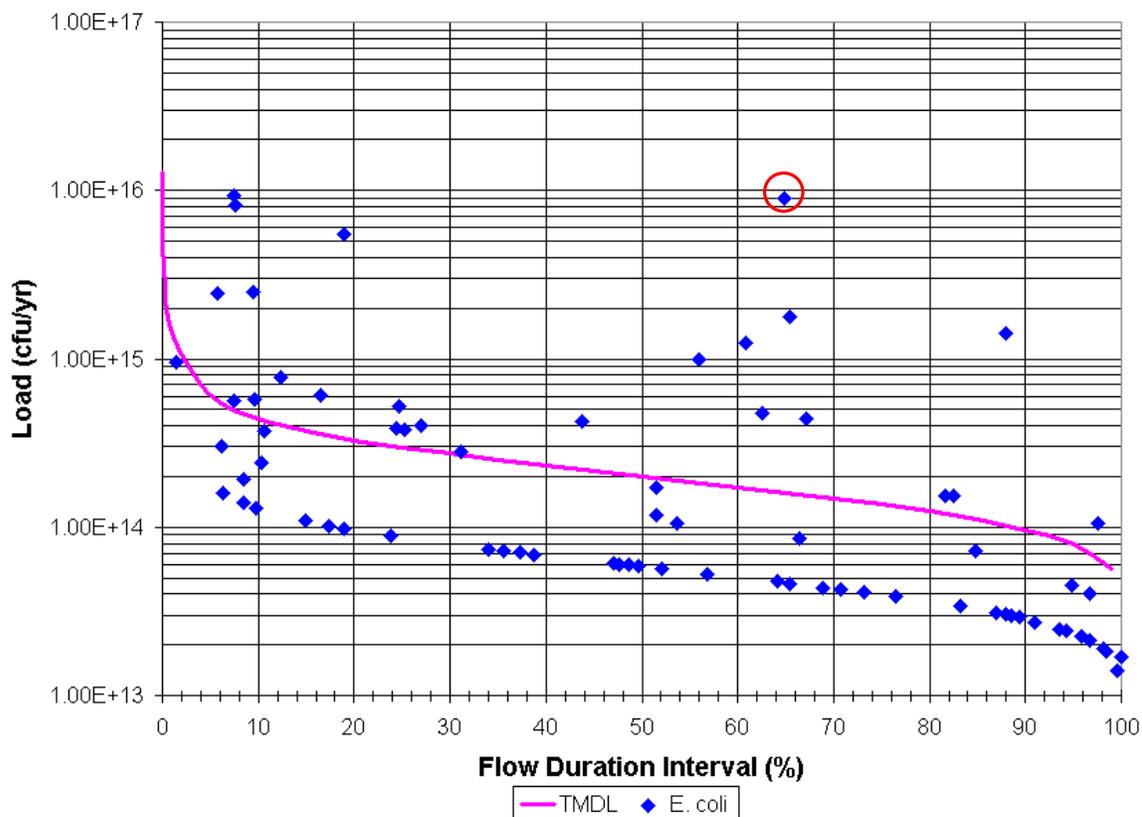
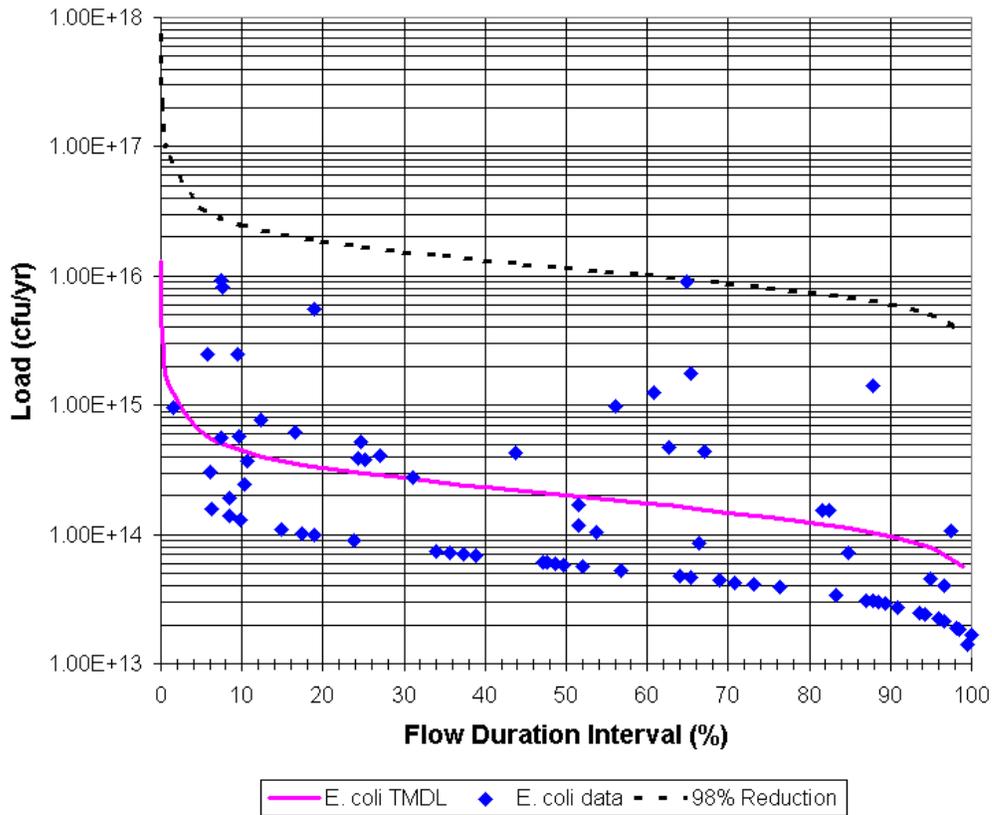


Figure 12 suggests that exceedances of the water quality standard occur under high, normal and low flow conditions. The highest exceedance of the water quality standard (circled) occurs at a normal flow that has been exceeded approximately 65% of the time (~77 cfs). This represents the flow condition under which the largest bacteria reduction is required in order to meet water quality standards. The translated load at this flow condition is 8.94×10^{15} cfu/yr. Under the instantaneous *E. coli* standard of 235 cfu/100mL, this load would have to be reduced by 98% to an allowable load of 1.62×10^{14} cfu/yr. The allowable load is simply the *E. coli* standard multiplied by the applicable flow condition and the proper unit conversions. The full calculation with unit conversions is presented in Appendix D.

In order to determine the necessary load reduction at the average annual flow condition, a second curve must be drawn through the highest exceedance described above. The second curve represents the magnitude of the highest observed exceedance if it were to occur over any flow condition. The graph of the load-duration curve with the max-exceedance curve is presented in Figure 13.

Figure 13. Load duration curve with max exceedance curve for South Mayo River at station 4ASMR016.09



6.2. TMDL

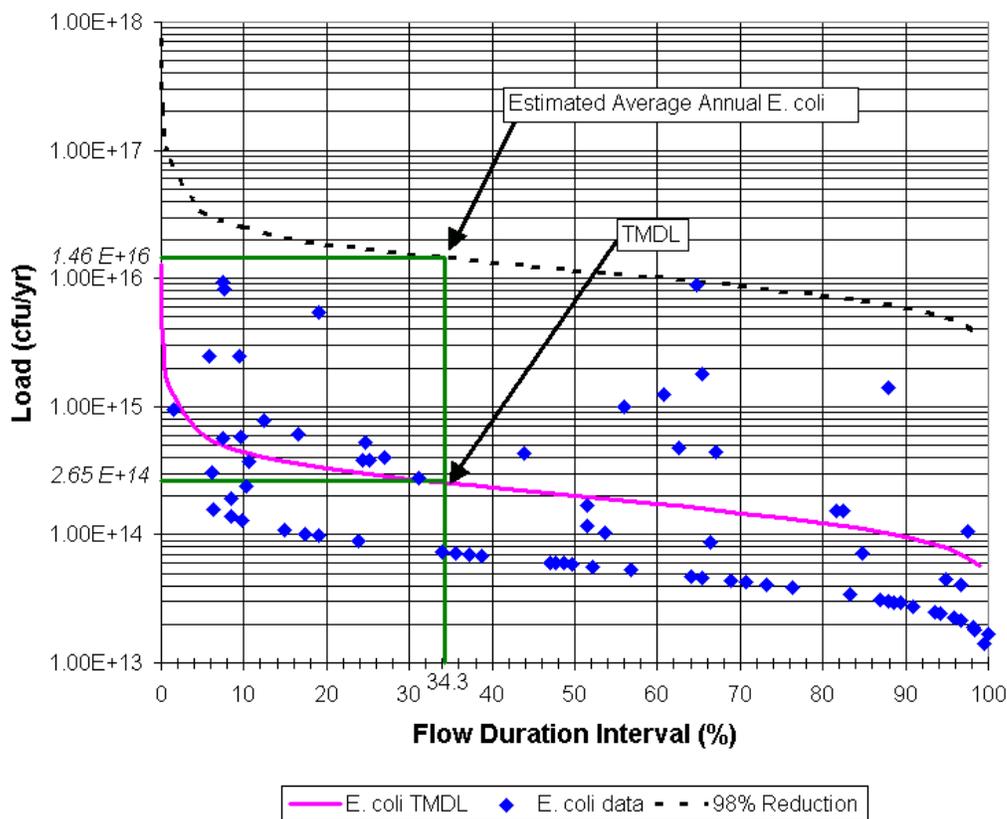
A Total Maximum Daily Load (TMDL) consists of 1) point source/waste load allocations (WLAs), 2) non-point sources/load allocations (LAs) where the non-point sources include natural/background levels, and 3) a margin of safety (MOS) where the margin of safety may be implicitly or explicitly defined. This TMDL definition is typically illustrated by the following equation:

$$TMDL = WLAs + LAs + MOS$$

Simply put, a TMDL is the amount of a pollutant that can be present in a waterbody where the waterbody will still meet water quality standards for that pollutant. In the case of load-duration bacteria TMDLs, the TMDL is expressed as the total number of colony forming units (cfu) per year as opposed to cfu/day. This is because the load-duration TMDL must be based on the average annual flow condition.

The average annual flow for the South Mayo River is calculated from the average annual flow from the USGS steam gage (#02069700). The estimated average annual flow for South Mayo River is 126.37 cfs. This flow value has an associated flow duration of 34.3%. From this information an average annual *E. coli* load and TMDL can be calculated from the max-exceedance and TMDL curves. This is represented graphically in Figure 14. The full calculation is presented in Appendix C.

Figure 14. Load duration curve illustrating the TMDL and estimated average annual *E. Coli* load for South Mayo River at station 4ASMR016.09



The average annual *E. coli* load is 1.46×10^{16} cfu/yr, and the TMDL under average annual flow conditions is 2.65×10^{14} cfu/yr. These values are used to calculate required reductions. By subtracting the waste load allocation (known value) from the TMDL (as determined above), the load allocation can be determined. These three values are presented in Table 11.

Table 11. Average annual *E. coli* loads and TMDL for South Mayo River watershed (cfu/yr)

WLA ¹	LA	MOS	TMDL
1.04×10^{12}	2.640×10^{14}	(implicit)	2.650×10^{14}

¹The point source permitted to discharge in the South Mayo River watershed are presented in section 5.2.

7. Allocations

Reduction

The annual average TMDL and *E. coli* load values from section 6.2, together with the waste load allocation from the one permitted bacteria sources in section 5.2, were plugged into Table 12 to determine the required reduction. Since the required reduction will only apply to the non-point sources, the LA value was used to calculate the required percent reduction. The full calculations are presented in Appendix C.

Table 12. TMDL and required reduction for South Mayo River

Allowable Loads (cfu/yr)		Average Annual EC Load (cfu/yr)	Required Reduction
Waste Load Allocation (WLA)	1.04×10^{12}		
Load Allocation (LA)	2.640×10^{14}		
MOS	(implicit)		
TMDL (annual average)	2.650×10^{14}	1.46×10^{16}	98.19%

As illustrated in Table 11 and 12, the WLA for the South Mayo River watershed has virtually no effect on the LA reduction calculations. The WLA represents approximately 0.4% of the TMDL load. An additional TMDL scenario where WLA has been increased by a factor of five was developed and is presented in Appendix E. This scenario gives flexibility to accommodate future expansion and/or additional discharges in the watershed.

Margin of Safety

This requirement is intended to add a level of safety to account for any inherent uncertainty in the TMDL development process and the data used in the development. The MOS may be either implicit or explicit. An implicit margin of safety relies on the conservative nature of the assumptions, values, and methods used to calculate a TMDL whereas an explicit margin of safety is a value (typically a percentage) applied at some point during the TMDL calculation.

In South Mayo River TMDL, an implicit MOS was incorporated through the use of conservative analytical assumptions. These include: (1) the use of the single-most extreme water quality violation event which was used to develop maximum exceedance curve over the entire range of flow conditions, and (2) the computation of average annual load using the average flow conditions. Additionally, the load duration method of TMDL development has been evaluated against TMDLs that were developed using computer modeling. The results showed the load duration method to be slightly more conservative.

Allocations

In order to apply the reduction calculated above, the average annual *E. coli* load had to be allocated to each of the four non-point sources identified in the BST analysis. Table 13 shows the distribution of the average annual *E. coli* load among sources, the reduction applied to each source, and the allowable loading for each source.

Table 13. Average annual load distribution, reduction, and allowable load by source

	Total (cfu/yr)	Human @ 18.35% (cfu/yr)	Pet @ 28.83% (cfu/yr)	Livestock @ 34.42% (cfu/yr)	Wildlife @ 18.40% (cfu/yr)
Average Annual Load	1.46 x 10¹⁶	2.68 x 10¹⁵	4.21 x 10¹⁵	5.03 x 10¹⁵	2.69 x 10¹⁵
Reduction	98.19%	98.19%	98.19%	98.19%	98.19%
Allowable Annual Load	2.64 x 10¹⁴	4.84 x 10¹³	7.61 x 10¹³	9.09 x 10¹³	4.86 x 10¹³

7.1. Consideration of Critical Conditions

EPA regulations at 40 CFR 130.7 (c)(1) require TMDLs to take into account critical conditions for stream flow, loading, and water quality parameters. The intent of this requirement is to ensure that the water quality of South Mayo River is protected during times when it is most vulnerable.

Critical conditions are important because they describe the factors that combine to cause a violation of water quality standards and will help in identifying the actions that may have to be undertaken to meet water quality standards. The sources of bacteria for South Mayo River are a mixture of dry and wet weather driven sources. TMDL development utilizing the load-duration approach applies to the full range of flow conditions; therefore, the critical conditions for South Mayo River were addressed during TMDL development.

7.2. Consideration of Seasonal Variations

Seasonal variations involve changes in stream flow and water quality as a result of hydrologic and climatological patterns. The load-duration approach allows the pattern of water quality exceedances to be examined for seasonal variations. The load-duration method used to develop this TMDL implicitly incorporates the seasonal variations of precipitation and runoff by looking at the highest water quality violation and applying it to the entire stream flow record when calculating the TMDL.

8. Implementation and Reasonable Assurance

The goal of the TMDL program is to establish a three-step path that will lead to attainment of water quality standards. The first step in the process is to develop TMDLs that will result in meeting water quality standards. This report represents the culmination of that effort for the bacteria impairments on the South Mayo River. The second step is to develop a TMDL implementation plan. The final step is to implement the TMDL implementation plan, and to monitor stream water quality to determine if water quality standards are being attained.

Once a TMDL has been approved by EPA, measures must be taken to reduce pollution levels in the stream. These measures, which can include the use of better treatment technology and the installation of best management practices (BMPs), are implemented in an iterative process that is described along with specific BMPs in the implementation plan. The process for developing an implementation plan has been described in the recent "TMDL Implementation Plan Guidance Manual", published in July 2003 and available upon request from the DEQ and DCR TMDL project staff or at <http://www.deq.state.va.us/tmdl/implans/ipguide.pdf> With successful completion of implementation plans, Virginia will be well on the way to restoring impaired waters and enhancing the value of this important resource. Additionally, development of an approved implementation plan will improve a locality's chances for obtaining financial and technical assistance during implementation.

8.1. TMDL Implementation Process

In general, Virginia intends for the required reductions to be implemented in an iterative process that first addresses those sources with the largest impact on water quality. For example, in agricultural areas of the watershed, the most promising management practice is livestock exclusion from streams. This has been shown to be very effective in lowering bacteria concentrations in streams, both by reducing the cattle deposits themselves and by providing additional riparian buffers.

Additionally, in both urban and rural areas, reducing the human bacteria loading from failing septic systems should be a primary implementation focus because of its health implications. This component could be implemented through education on septic tank pump-outs as well as a septic system repair/replacement program and the use of alternative waste treatment systems.

In urban areas, reducing the human bacteria loading from leaking sewer lines could be accomplished through a sanitary sewer inspection and management program. Other BMPs that might be appropriate for controlling urban wash-off from parking lots and roads and that could be readily implemented may include more restrictive ordinances to reduce fecal loads from pets, improved garbage collection and control, and improved street cleaning.

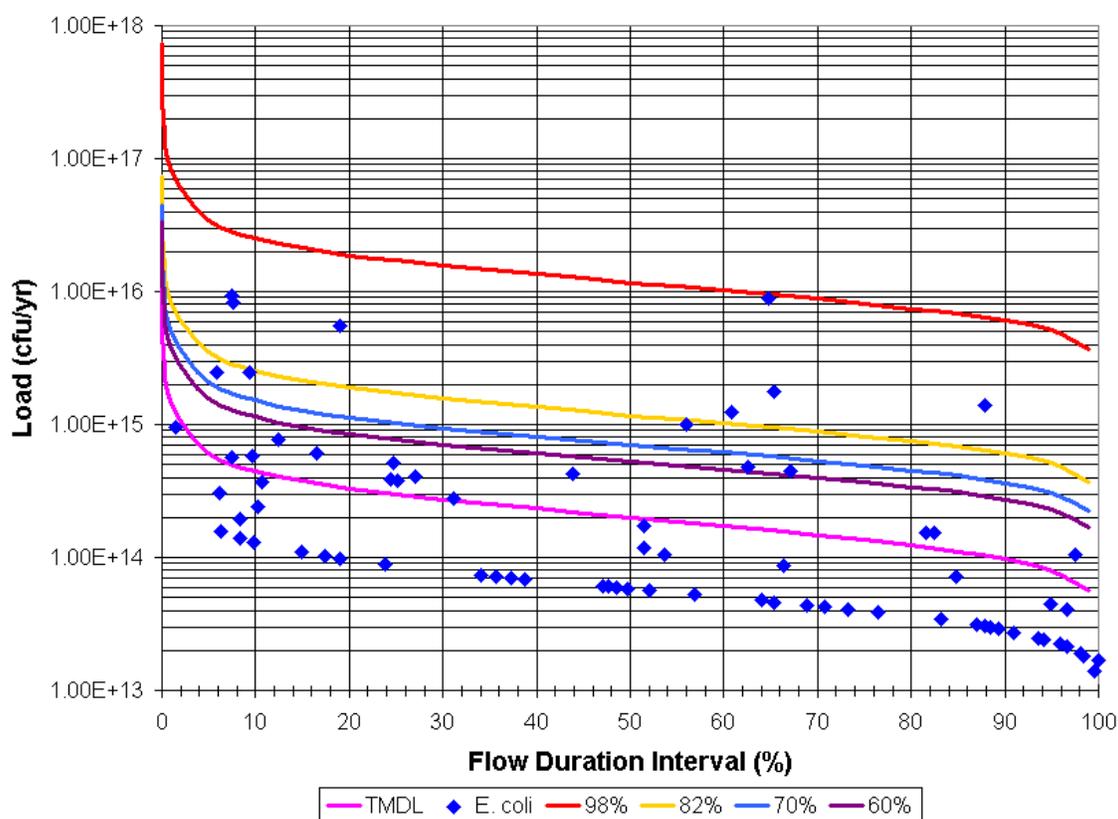
The iterative implementation of BMPs in the watershed has several benefits:

1. It enables tracking of water quality improvements following BMP implementation through follow-up stream monitoring;
2. It provides a measure of quality control, given the uncertainties inherent in computer simulation modeling;
3. It provides a mechanism for developing public support through periodic updates on BMP implementation and water quality improvements;
4. It helps ensure that the most cost effective practices are implemented first; and
5. It allows for the evaluation of the adequacy of the TMDL in achieving water quality standards.

8.2. Stage I Implementation Goal

As stated in Section 7.0 the TMDL requires a 98% reduction in non-point source loading in order to attain a 0% violation of water quality standards. In order to evaluate interim reduction goals for a phased implementation plan, several reduction levels and their associated violation rates were assessed. Reduction curves similar to the max exceedance/reduction curve of Figure 13 were plotted on the South Mayo River load-duration curve. These reduction curves are presented in Figure 15.

Figure 15. Load duration curve illustrating the TMDL and reduction curves for South Mayo River at station 4ASMR016.09



The theoretical violation rates for the various load reductions presented in Figure 13 are presented below in Table 14.

Table 14. Load Reductions and WQS Violation Rates

Load Reduction	Violation Rate
98%	0%
82%	9%
70%	12%
60%	15%
Current Load	31%

Based on the reduction analysis presented above and a goal of measurable water quality improvement, a suitable Phase I reduction level would be 70%. Table 15 presents the Phase I load allocations based on a 70% reduction of in-stream loads.

Table 15. Phase I Load Allocations (based on a 70% reduction)

	Total (cfu/yr)	Human (cfu/yr)	Pet (cfu/yr)	Livestock (cfu/yr)	Wildlife (cfu/yr)
Average Annual Load	1.46 x 10 ¹⁶	2.68 x 10 ¹⁵	4.21 x 10 ¹⁵	5.03 x 10 ¹⁵	2.69 x 10 ¹⁵
Reduction	70%	98	95	72	0
Target Annual Load	4.38 x 10 ¹⁵	4.82 x 10 ¹³	2.10 x 10 ¹⁴	1.43 x 10 ¹⁵	2.69 x 10 ¹⁵

In order to provide some insight into the nature of the South Mayo River water quality violations and to better target possible BMPs, the correlation between violations, stream flow change, and local precipitation was examined.

Results indicate that approximately 68% of the violations occurred during times of precipitation and increasing stream flow or just after a precipitation event with stable or decreasing stream flow. This suggests that those violations could be related to runoff events. The complete analysis is presented in Appendix D.

BMPs effective in correcting dry weather/low-flow violations of the bacteria water quality standard typically include: streamside fencing for cattle exclusion, straight pipe replacement, and septic system repair. Among some of the BMPs effective in reducing bacteria runoff from precipitation events include: riparian buffers zone, retention ponds/basins, range and pasture management, and animal waste management. Detailed lists of BMPs and their relative effectiveness will be presented in the eventual TMDL implementation plan for the South Mayo River watershed.

8.3. Link to Ongoing Restoration Efforts

The local Patrick County Virginia Soil and Water Conservation District (PCSWCD), in recent years, has made significant progress in implementing Best Management Practices (BMP) in the South Mayo River watershed. Local producers trust the staff at PCSWCD and several hundred thousand dollars of Environmental Quality Incentives Program (EQIP) monies have been spent in the watershed. However, current available BMP monies are limited in the watershed. VDEQ and PCSWCD believe additional grants monies through the TMDL program would be greatly beneficial to reach members of the community that have not yet participated in BMP programs.

8.4. Reasonable Assurance for Implementation

8.4.1. Follow-Up Monitoring

VADEQ will continue to monitor South Mayo River in accordance with its ambient monitoring program. These monitoring stations include 4ASMR016.09, 4ASMR027.44, and 4ASMR033.98. VADEQ and VADCR will continue to use data from the monitoring stations on South Mayo River to evaluate reductions in bacteria counts and the effectiveness of the TMDL in attainment of water quality standards. Ambient sampling includes field parameters (temperature, pH, dissolved oxygen, conductivity), bacteria, nutrients and solids. Future bacteria sampling will consist of *E. coli* sampling only, since the interim fecal coliform bacteria will be phased out after twelve *E. coli* samples have been collected.

8.4.2. Regulatory Framework

While section 303(d) of the Clean Water Act and current EPA regulations do not require the development of TMDL implementation plans as part of the TMDL process, they do require reasonable assurance that the load and wasteload allocations can and will be implemented. Additionally, Virginia's 1997 Water Quality Monitoring, Information and Restoration Act (the "Act") directs the State Water Control Board to "develop and implement a plan to achieve fully supporting status for impaired waters" (Section 62.1-44.19.7). The Act also establishes that the implementation plan shall include the date of expected achievement of water quality objectives, measurable goals, corrective actions necessary and the associated costs, benefits and environmental impacts of addressing the impairments. EPA outlines the minimum elements of an approvable implementation plan in its 1999 "Guidance for Water Quality-Based Decisions: The TMDL Process." The listed elements include implementation actions/management measures, timelines, legal or regulatory controls, time required to attain water quality standards, monitoring plans and milestones for attaining water quality standards.

Watershed stakeholders will have opportunities to provide input and to participate in the development of the implementation plan, which will also be supported by regional and local offices of DEQ, DCR, and other cooperating agencies.

Once developed, DEQ intends to incorporate the TMDL implementation plan into the appropriate Water Quality Management Plan (WQMP), in accordance with the Clean Water Act's Section 303(e). In response to a Memorandum of Understanding (MOU) between EPA and DEQ, DEQ also submitted a draft Continuous Planning Process to EPA in which DEQ commits to regularly updating the WQMPs. Thus, the WQMPs will be, among other things, the repository for all TMDLs and TMDL implementation plans developed within a river basin.

8.4.3. Implementation Funding Sources

A key factor in implementing TMDLs is funding. One potential source of funding for TMDL implementation is Section 319 of the Clean Water Act. Section 319 funding is a major source of funds for Virginia's Nonpoint Source Management Program. Watershed restoration activities, such as TMDL implementation, are eligible for Section 319 funding. Other funding sources for implementation include the U.S. Department of Agriculture's Conservation Reserve Enhancement Program (CREP) and Environmental Quality Incentive Programs (EQIP), the Virginia State Revolving Loan Program, and the VA Water Quality Improvement Fund (WQIP). The TMDL Implementation Plan Guidance Manual contains additional information on funding sources, as well as government agencies that might support implementation efforts and suggestions for integrating TMDL implementation with other watershed planning efforts.

8.4.4. Wildlife Contributions and Water Quality Standards

In some streams for which TMDLs have been developed, water quality modeling indicates that even after removal of all bacteria sources (other than wildlife), the stream will not attain standards under all flow regimes at all times. Virginia and EPA are not proposing the elimination of wildlife to allow for the attainment of water quality standards. While managing overpopulations of wildlife remains as an option to local stakeholders, the reduction of wildlife or changing a natural background condition is not the intended goal of a TMDL.

To address this issue, Virginia has proposed (during its recent triennial water quality standards review) a new "secondary contact" category for protecting the recreational use in state waters. On March 25, 2003, the Virginia State Water Control Board adopted criteria for "secondary contact recreation" which means "a water-based form of recreation, the practice of which has a low probability for total body immersion or ingestion of waters (examples include but are not limited to wading, boating and fishing)". These new criteria will become effective pending EPA approval and can be found at <http://www.deq.state.va.us/wqs/rule.html>.

In order for the new criteria to apply to a specific stream segment, the primary contact recreational use must be removed. To remove a designated use, the state must demonstrate 1) that the use is not an existing use, 2) that downstream uses are protected, and 3) that the source of bacterial contamination is natural and uncontrollable by effluent limitations and by implementing cost-effective and reasonable best management practices for nonpoint source control (9 VAC 25-260-10). This and other information is collected through a special study called a Use Attainability Analysis (UAA). All site-specific criteria or designated use changes must be adopted as amendments to the water quality standards regulations. Watershed stakeholders and EPA will be able to provide comment during this process. Additional information can be obtained at <http://www.deq.state.va.us/wqs/WQS03AUG.pdf>

Based on the above, EPA and Virginia have developed a process to address the wildlife issue. First in this process is the development of a stage 1 scenario such as those presented previously in this chapter. The pollutant reductions in the stage 1 scenario are targeted only at the controllable, anthropogenic bacteria sources identified in the TMDL, setting aside control strategies for wildlife except for cases of overpopulations. During the implementation of the stage 1 scenario, all controllable sources would be reduced to the maximum extent practicable using the iterative approach described in section 8.1 above. DEQ will re-assess water quality in the stream during and subsequent to the implementation of the stage 1 scenario to determine if the water quality standard is attained. This effort will also evaluate if the modeling assumptions were correct. If water quality standards are not being met, a UAA may be initiated to reflect the presence of naturally high bacteria levels due to uncontrollable sources. In some cases, the

effort may never have to go to the UAA phase because the water quality standard exceedances attributed to wildlife in the model may have been very small and infrequent and within the margin of error.

9.0 Public Participation

The development of the South Mayo River TMDL would not have been possible without public participation. A public meeting was held in Stuart, Virginia on November 19, 2003 to discuss the process for TMDL development and the source assessment input. Twelve people attended. Copies of the presentation materials and the draft TMDL report were available for public distribution. The meeting was public noticed in the Virginia Register. There was a 30 day-public comment period and 0 written comment was received.

10. References

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Appendix A

Glossary

GLOSSARY

Note: All entries in italics are taken from USEPA (1998). All non-italicized entries are taken from MapTech (2002).

303(d). A section of the Clean Water Act of 1972 requiring states to identify and list water bodies that do not meet the states' water quality standards.

***Allocations.** That portion of a receiving water's loading capacity attributed to one of its existing or future pollution sources (nonpoint or point) or to natural background sources. (A wasteload allocation [WLA] is that portion of the loading capacity allocated to an existing or future point source, and a load allocation [LA] is that portion allocated to an existing or future nonpoint source or to natural background levels. Load allocations are best estimates of the loading, which can range from reasonably accurate estimates to gross allotments, depending on the availability of data and appropriate techniques for predicting loading.)*

***Ambient water quality.** Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact on human health.*

***Anthropogenic.** Pertains to the [environmental] influence of human activities.*

***Antidegradation Policies.** Policies that are part of each states water quality standards. These policies are designed to protect water quality and provide a method of assessing activities that might affect the integrity of waterbodies.*

***Background levels.** Levels representing the chemical, physical, and biological conditions that would result from natural geomorphological processes such as weathering or dissolution.*

***Bacteria.** Single-celled microorganisms. Bacteria of the coliform group are considered the primary indicators of fecal contamination and are often used to assess water quality.*

Bacterial source tracking (BST). A collection of scientific methods used to track sources of fecal contamination.

***Best management practices (BMPs).** Methods, measures, or practices determined to be reasonable and cost-effective means for a landowner to meet certain, generally nonpoint source, pollution control needs. BMPs include structural and nonstructural controls and operation and maintenance procedures.*

Biosolids. Biologically treated solids originating from municipal wastewater treatment plants.

Clean Water Act (CWA). *The Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972), Public Law 92-500, as amended by Public Law 96-483 and Public Law 97-117, 33 U.S.C. 1251 et seq. The Clean Water Act (CWA) contains a number of provisions to restore and maintain the quality of the nation's water resources. One of these provisions is section 303(d), which establishes the TMDL program.*

Concentration. *Amount of a substance or material in a given unit volume of solution; usually measured in milligrams per liter (mg/L) or parts per million (ppm).*

Concentration-based limit. *A limit based on the relative strength of a pollutant in a waste stream, usually expressed in milligrams per liter (mg/L).*

Confluence. *The point at which a river and its tributary flow together.*

Contamination. *The act of polluting or making impure; any indication of chemical, sediment, or biological impurities.*

Cost-share program. *A program that allocates project funds to pay a percentage of the cost of constructing or implementing a best management practice. The remainder of the costs is paid by the producer(s).*

Critical condition. *The critical condition can be thought of as the "worst case" scenario of environmental conditions in the waterbody in which the loading expressed in the TMDL for the pollutant of concern will continue to meet water quality standards. Critical conditions are the combination of environmental factors (e.g., flow, temperature, etc.) that results in attaining and maintaining the water quality criterion and has an acceptably low frequency of occurrence.*

Designated uses. *Those uses specified in water quality standards for each waterbody or segment whether or not they are being attained.*

Dilution. *The addition of some quantity of less-concentrated liquid (water) that results in a decrease in the original concentration.*

Direct runoff. *Water that flows over the ground surface or through the ground directly into streams, rivers, and lakes.*

Discharge. *Flow of surface water in a stream or canal, or the outflow of groundwater from a flowing artesian well, ditch, or spring. Can also apply to discharge of liquid effluent from a facility or to chemical emissions into the air through designated venting mechanisms.*

Discharge permits (under NPDES). *A permit issued by the U.S. EPA or a state regulatory agency that sets specific limits on the type and amount of pollutants that a municipality or industry can discharge to a receiving water; it also includes a compliance schedule for achieving those limits. The permit process was established*

under the National Pollutant Discharge Elimination System, under provisions of the Federal Clean Water Act.

DNA. Deoxyribonucleic acid. The genetic material of cells and some viruses.

Domestic wastewater. *Also called sanitary wastewater, consists of wastewater discharged from residences and from commercial, institutional, and similar facilities.*

Drainage basin. *A part of a land area enclosed by a topographic divide from which direct surface runoff from precipitation normally drains by gravity into a receiving water. Also referred to as a watershed, river basin, or hydrologic unit.*

Effluent. *Municipal sewage or industrial liquid waste (untreated, partially treated, or completely treated) that flows out of a treatment plant, septic system, pipe, etc.*

Effluent limitation. *Restrictions established by a state or EPA on quantities, rates, and concentrations in pollutant discharges.*

Endpoint. *An endpoint (or indicator/target) is a characteristic of an ecosystem that may be affected by exposure to a stressor. Assessment endpoints and measurement endpoints are two distinct types of endpoints commonly used by resource managers. An assessment endpoint is the formal expression of a valued environmental characteristic and should have societal relevance (an indicator). A measurement endpoint is the expression of an observed or measured response to a stress or disturbance. It is a measurable environmental characteristic that is related to the valued environmental characteristic chosen as the assessment endpoint. The numeric criteria that are part of traditional water quality standards are good examples of measurement endpoints (targets).*

Existing use. *Use actually attained in the waterbody on or after November 28, 1975, whether or not it is included in the water quality standards (40 CFR 131.3).*

Fecal Coliform. Indicator organisms (organisms indicating presence of pathogens) associated with the digestive tract.

Feedlot. *A confined area for the controlled feeding of animals. Tends to concentrate large amounts of animal waste that cannot be absorbed by the soil and, hence, may be carried to nearby streams or lakes by rainfall runoff.*

Geometric mean. A measure of the central tendency of a data set that minimizes the effects of extreme values.

GIS. Geographic Information System. A system of hardware, software, data, people, organizations and institutional arrangements for collecting, storing, analyzing and disseminating information about areas of the earth. (Dueker and Kjerne, 1989)

Ground water. *The supply of fresh water found beneath the earth's surface, usually in aquifers, which supply wells and springs. Because ground water is a major source of drinking water, there is growing concern over contamination from leaching agricultural or industrial pollutants and leaking underground storage tanks.*

Hydrograph. *A graph showing variation of stage (depth) or discharge in a stream over a period of time.*

Hydrologic cycle. *The circuit of water movement from the atmosphere to the earth and its return to the atmosphere through various stages or processes, such as precipitation, interception, runoff, infiltration, storage, evaporation, and transpiration.*

Hydrology. *The study of the distribution, properties, and effects of water on the earth's surface, in the soil and underlying rocks, and in the atmosphere.*

Indicator. *A measurable quantity that can be used to evaluate the relationship between pollutant sources and their impact on water quality.*

Indicator organism. *An organism used to indicate the potential presence of other (usually pathogenic) organisms. Indicator organisms are usually associated with the other organisms, but are usually more easily sampled and measured.*

In situ. *In place; in situ measurements consist of measurements of components or processes in a full-scale system or a field, rather than in a laboratory.*

Isolate. *An inbreeding biological population that is isolated from similar populations by physical or other means.*

Limits (upper and lower). *The lower limit equals the lower quartile – 1.5x(upper quartile – lower quartile), and the upper limit equals the upper quartile + 1.5x(upper quartile – lower quartile). Values outside these limits are referred to as outliers.*

Loading, Load, Loading rate. *The total amount of material (pollutants) entering the system from one or multiple sources; measured as a rate in weight per unit time.*

Load allocation (LA). *The portion of a receiving water's loading capacity attributed either to one of its existing or future nonpoint sources of pollution or to natural background sources. Load allocations are best estimates of the loading, which can range from reasonably accurate estimates to gross allotments, depending on the availability of data and appropriate techniques for predicting the loading. Wherever possible, natural and nonpoint source loads should be distinguished (40 CFR 130.2(g)).*

Loading capacity (LC). *The greatest amount of loading a water can receive without violating water quality standards.*

Margin of safety (MOS). *A required component of the TMDL that accounts for the uncertainty about the relationship between the pollutant loads and the quality of the*

receiving waterbody (CWA section 303(d)(1)(C)). The MOS is normally incorporated into the conservative assumptions used to develop TMDLs (generally within the calculations or models) and approved by EPA either individually or in state/EPA agreements. If the MOS needs to be larger than that which is allowed through the conservative assumptions, additional MOS can be added as a separate component of the TMDL (in this case, quantitatively, a $TMDL = LC = WLA + LA + MOS$).

Mathematical model. A system of mathematical expressions that describe the spatial and temporal distribution of water quality constituents resulting from fluid transport and the one or more individual processes and interactions within some prototype aquatic ecosystem. A mathematical water quality model is used as the basis for waste load allocation evaluations.

Mean. The sum of the values in a data set divided by the number of values in the data set.

MGD. Million gallons per day. A unit of water flow, whether discharge or withdraw.

Monitoring. Periodic or continuous surveillance or testing to determine the level of compliance with statutory requirements and/or pollutant levels in various media or in humans, plants, and animals.

Narrative criteria. Nonquantitative guidelines that describe the desired water quality goals.

National Pollutant Discharge Elimination System (NPDES). The national program for issuing, modifying, revoking and re-issuing, terminating, monitoring, and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Clean Water Act.

Natural waters. Flowing water within a physical system that has developed without human intervention, in which natural processes continue to take place.

Non-point source. Pollution that originates from multiple sources over a relatively large area. Nonpoint sources can be divided into source activities related to either land or water use including failing septic tanks, improper animal-keeping practices, forest practices, and urban and rural runoff.

Numeric targets. A measurable value determined for the pollutant of concern, which, if achieved, is expected to result in the attainment of water quality standards in the listed waterbody.

Organic matter. The organic fraction that includes plant and animal residue at various stages of decomposition, cells and tissues of soil organisms, and substances synthesized by the soil population. Commonly determined as the amount of organic material contained in a soil or water sample.

Peak runoff. The highest value of the stage or discharge attained by a flood or storm event; also referred to as flood peak or peak discharge.

Permit. *An authorization, license, or equivalent control document issued by EPA or an approved federal, state, or local agency to implement the requirements of an environmental regulation; e.g., a permit to operate a wastewater treatment plant or to operate a facility that may generate harmful emissions.*

Phased approach. *Under the phased approach to TMDL development, load allocations and wasteload allocations are calculated using the best available data and information recognizing the need for additional monitoring data to accurately characterize sources and loadings. The phased approach is typically employed when nonpoint sources dominate. It provides for the implementation of load reduction strategies while collecting additional data.*

Point source. *Pollutant loads discharged at a specific location from pipes, outfalls, and conveyance channels from either municipal wastewater treatment plants or industrial waste treatment facilities. Point sources can also include pollutant loads contributed by tributaries to the main receiving water stream or river.*

Pollutant. *Dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water. (CWA section 502(6)).*

Pollution. *Generally, the presence of matter or energy whose nature, location, or quantity produces undesired environmental effects. Under the Clean Water Act, for example, the term is defined as the man-made or man-induced alteration of the physical, biological, chemical, and radiological integrity of water.*

Privately owned treatment works. *Any device or system that is (a) used to treat wastes from any facility whose operator is not the operator of the treatment works and (b) not a publicly owned treatment works.*

Public comment period. *The time allowed for the public to express its views and concerns regarding action by EPA or states (e.g., a Federal Register notice of a proposed rule-making, a public notice of a draft permit, or a Notice of Intent to Deny).*

Publicly owned treatment works (POTW). *Any device or system used in the treatment (including recycling and reclamation) of municipal sewage or industrial wastes of a liquid nature that is owned by a state or municipality. This definition includes sewers, pipes, or other conveyances only if they convey wastewater to a POTW providing treatment.*

Raw sewage. *Untreated municipal sewage.*

Receiving waters. *Creeks, streams, rivers, lakes, estuaries, ground-water formations, or other bodies of water into which surface water and/or treated or untreated waste are discharged, either naturally or in man-made systems.*

Restoration. *Return of an ecosystem to a close approximation of its presumed condition prior to disturbance.*

Riparian areas. *Areas bordering streams, lakes, rivers, and other watercourses. These areas have high water tables and support plants that require saturated soils during all or part of the year. Riparian areas include both wetland and upland zones.*

Riparian zone. *The border or banks of a stream. Although this term is sometimes used interchangeably with floodplain, the riparian zone is generally regarded as relatively narrow compared to a floodplain. The duration of flooding is generally much shorter, and the timing less predictable, in a riparian zone than in a river floodplain.*

Runoff. *That part of precipitation, snowmelt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into receiving waters.*

Septic system. *An on-site system designed to treat and dispose of domestic sewage. A typical septic system consists of a tank that receives waste from a residence or business and a drain field or subsurface absorption system consisting of a series of percolation lines for the disposal of the liquid effluent. Solids (sludge) that remain after decomposition by bacteria in the tank must be pumped out periodically.*

Sewer. *A channel or conduit that carries wastewater and storm water runoff from the source to a treatment plant or receiving stream. Sanitary sewers carry household, industrial, and commercial waste. Storm sewers carry runoff from rain or snow. Combined sewers handle both.*

Slope. *The degree of inclination to the horizontal. Usually expressed as a ratio, such as 1:25 or 1 on 25, indicating one unit vertical rise in 25 units of horizontal distance, or in a decimal fraction (0.04), degrees (2 degrees 18 minutes), or percent (4 percent).*

Stakeholder. Any person with a vested interest in the TMDL development.

Standard. In reference to water quality (e.g. 200 cfu/100 ml geometric mean limit).

Storm runoff. *Storm water runoff, snowmelt runoff, and surface runoff and drainage; rainfall that does not evaporate or infiltrate the ground because of impervious land surfaces or a soil infiltration rate lower than rainfall intensity, but instead flows onto adjacent land or into waterbodies or is routed into a drain or sewer system.*

Streamflow. *Discharge that occurs in a natural channel. Although the term "discharge" can be applied to the flow of a canal, the word "streamflow" uniquely describes the discharge in a surface stream course. The term "streamflow" is more general than "runoff" since streamflow may be applied to discharge whether or not it is affected by diversion or regulation.*

Stream restoration. *Various techniques used to replicate the hydrological, morphological, and ecological features that have been lost in a stream because of urbanization, farming, or other disturbance.*

Surface area. *The area of the surface of a waterbody; best measured by planimetry or the use of a geographic information system.*

Surface runoff. *Precipitation, snowmelt, or irrigation water in excess of what can infiltrate the soil surface and be stored in small surface depressions; a major transporter of nonpoint source pollutants.*

Surface water. *All water naturally open to the atmosphere (rivers, lakes, reservoirs, ponds, streams, impoundments, seas, estuaries, etc.) and all springs, wells, or other collectors directly influenced by surface water.*

Topography. *The physical features of a geographic surface area including relative elevations and the positions of natural and man-made features.*

Total Maximum Daily Load (TMDL). *The sum of the individual wasteload allocations (WLAs) for point sources, load allocations (LAs) for nonpoint sources and natural background, plus a margin of safety (MOS). TMDLs can be expressed in terms of mass per time, toxicity, or other appropriate measures that relate to a state's water quality standard.*

Transport of pollutants (in water). *Transport of pollutants in water involves two main processes: (1) advection, resulting from the flow of water, and (2) dispersion, or transport due to turbulence in the water.*

Tributary. *A lower order-stream compared to a receiving waterbody. "Tributary to" indicates the largest stream into which the reported stream or tributary flows.*

Variance. *A measure of the variability of a data set. The sum of the squared deviations (observation – mean) divided by (number of observations) – 1.*

DACS. Department of Agriculture and Consumer Services.

DCR. Department of Conservation and Recreation.

DEQ. Virginia Department of Environmental Quality.

VDH. Virginia Department of Health.

Wasteload allocation (WLA). *The portion of a receiving waters' loading capacity that is allocated to one of its existing or future point sources of pollution. WLAs constitute a type of water quality-based effluent limitation (40 CFR 130.2(h)).*

Wastewater. Usually refers to effluent from a sewage treatment plant. See also **Domestic wastewater**.

Wastewater treatment. Chemical, biological, and mechanical procedures applied to an industrial or municipal discharge or to any other sources of contaminated water to remove, reduce, or neutralize contaminants.

Water quality. The biological, chemical, and physical conditions of a waterbody. It is a measure of a waterbody's ability to support beneficial uses.

Water quality criteria. Levels of water quality expected to render a body of water suitable for its designated use, composed of numeric and narrative criteria. Numeric criteria are scientifically derived ambient concentrations developed by EPA or states for various pollutants of concern to protect human health and aquatic life. Narrative criteria are statements that describe the desired water quality goal. Criteria are based on specific levels of pollutants that would make the water harmful if used for drinking, swimming, farming, fish production, or industrial processes.

Water quality standard. Law or regulation that consists of the beneficial designated use or uses of a waterbody, the numeric and narrative water quality criteria that are necessary to protect the use or uses of that particular waterbody, and an antidegradation statement.

Watershed. A drainage area or basin in which all land and water areas drain or flow toward a central collector such as a stream, river, or lake at a lower elevation.

WQIA. Water Quality Improvement Act.

Appendix B

Antibiotic Resistance Analysis (MapTech)

When performing ARA, isolates (colonies picked from membrane filtration plates) of *E. coli* or *Enterococcus* are transferred to a 96-well tissue culture plate (one isolate per well) containing a selective liquid medium. The 96-well plates are incubated and confirmed as *E. coli* or



Figure 1. 96-well plate after incubation.

Enterococcus by color changes in the liquid after incubation (Figure 1). Antibiotic stock solutions are prepared and each of twentyeight or more antibiotic/concentrations is added separately to flasks of autoclaved and cooled Trypticase Soy Agar (TSA) from the stock solutions to achieve the desired concentration, and then poured into sterile 15x100mm petri dishes.

Control plates (no antibiotics) are included with each set. Isolates are transferred from the 96-well plate using a stainless steel 48-prong replica plater (Sigma). The replicator is flame-sterilized (95% ethanol) after inoculation of each TSA plate. Resistance to an antibiotic is determined by comparing each isolate to the growth of that isolate on the control plate. A one (1) is recorded for growth and a zero (0) is recorded for no growth (Figure 2). This is repeated for each isolate on each of the 30 antibiotic plates to develop a profile.

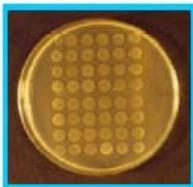


Figure 2. TSA control plate (with no antibiotics) showing growth of all 48 isolates.

The profile is then compared against the known source library to determine the source of the isolate (see data analysis section). The basic process is the same for all approaches, that is, a data base of known sources analyzed using the BST method of choice must be developed and samples of unknown bacterial origin are collected, analyzed and compared to the known source database. For studies, such as Total Maximum Daily Loads (TMDL), we recommend the ARA procedure due to typical cost constraints. Typically we analyze 24 isolates per unknown source (e.g. stream or well water) sample. This provides measurements of the proportion of a given source that are in increments of approximately 4%. If more precision is required, 48 isolates can be analyzed, resulting in resolution of approximately 2%. If the sampling is to be done in a geographical area where a database of known sources has not been developed, we will need to collect samples from known sources (i.e. human, livestock, wildlife) and compare them to our existing databases to determine if one of our existing databases is compatible with the study area. Twenty-four isolates from each of these samples will be analyzed. If no existing database is compatible, we will need to develop a database for the study area. The number of samples needed depend on variability of source samples. We have had a good deal of success in the past by using existing databases through obtaining known source samples from each group (i.e. human, livestock, wildlife) in the study area and comparing them to existing databases.

Appendix C

Calculations

Calculations

Allowable Load Calculation from Section 6.2.

$$\text{TMDL cfu/yr} = Q \text{ ft}^3/\text{s} * 7.48 \text{ gal/ft}^3 * 3.785 \text{ l/gal} * 1000 \text{ ml/l} * 235 \text{ cfu/100 ml} * 60 \text{ s/min} * 60 \text{ min/day} * 24 \text{ hrs/day} * 365 \text{ days/yr}$$

Where:

TMDL cfu/yr = Allowable load in cfu/yr

235 cfu/100 ml = Instantaneous *E. coli* standard

Q ft³/s = Flow in cubic feet per second

cfu = *E. coli* colony forming units.

l = liters

ml = milliliters

s = seconds

min = minutes

yr = year

gal = gallons

Required Reduction Calculation from Section 7.

$$\text{TMDL cfu/yr} = \text{LA cfu/yr} + \text{WLA cfu/yr} + \text{MOS (cfu/yr)}$$

$$\text{OL} = \text{LA cfu/yr} + \text{WLA cfu/yr}$$

$$\% \text{ reduction} = [(\text{OL} - \text{TMDL})/\text{OL}] * 100$$

Where:

TMDL = total maximum daily load

LA = load allocation

WLA = waste load allocation

MOS = margin of safety

OL = observed load (average annual load)

Appendix D

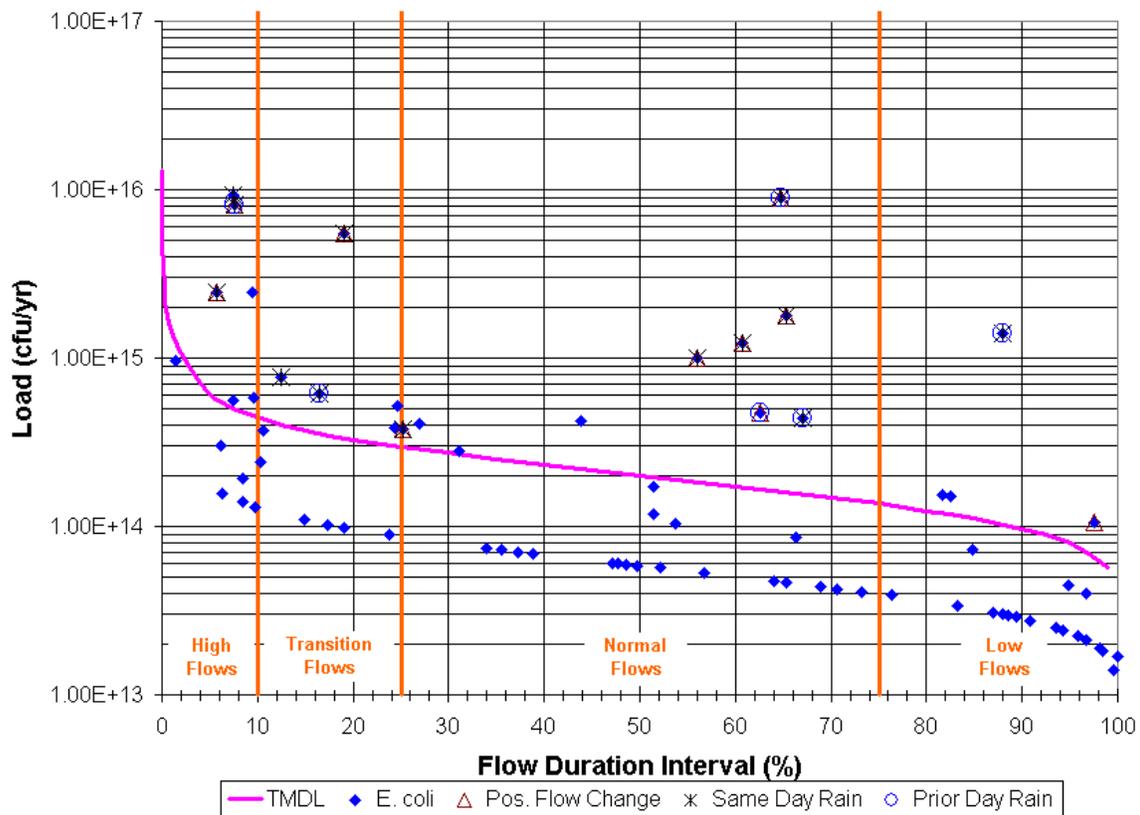
Flow Change and Precipitation Analysis

In the interest of better-targeted BMPs for the South Mayo watershed, the correlation between water quality violations, stream flow changes and precipitation was investigated. The goal was to determine which violations might be related to runoff and which might be related to direct deposition.

As stated in Section 6.1 on flow data, a continuous stream gauge with 40 years of data is located in the South Mayo River watershed. To assess the link between flow changes and precipitation events, precipitation records from the Stuart, VA weather station (COOP ID 448170), located approximately 10 miles northwest of the South Mayo River watershed, were examined. Precipitation events on the day before and on the day of each violation were examined. Precipitation events on the day before the violation were examined to see if decreasing flows on violation days were the result of a precipitation event within the preceding 24 hours.

Results of the study are presented graphically and in tabular format below.

Precipitation and Flow Annotated WQS Violation Events (South Mayo River Watershed)



Water Quality Standard Violations, Stream Flow Change, and Precipitation

Sampling Date	Fecal Coliform (cfu/100 mL)	Translated <i>E. coli</i> Value (cfu/100 mL)	Duration Interval	<i>E. coli</i> Load (cfu/yr)	Increasing Flow	Same Day Rain (inches)	Prior Day Rain (inches)
7/26/89	2400	1263	9.4	2.47E+15	no	No Data	No Data
10/10/89	500	299	9.6	5.789E+14	no	No Data	No Data
11/21/89	400	243	31.1	2.782E+14	no	No Data	No Data
7/11/90	8000	3819	19	5.491E+15	yes	0.69	0
1/25/93	1900	1019	5.8	2.466E+15	yes	0.63	0
7/15/93	500	299	25.2	3.788E+14	yes	0.08	0
7/13/94	2400	1263	56	9.925E+14	yes	0.16	0
1/24/95	500	299	24.4	3.842E+14	no	0	0
7/17/95	3300	1692	60.8	1.239E+15	yes	0.47	0
10/5/95	8000	3819	7.6	8.185E+15	yes	2.12	0.33
1/17/96	700	407	24.7	5.198E+14	no	0	0
7/15/96	1200	668	62.6	4.772E+14	yes	0	0.03
10/20/97	6500	3156	87.9	1.409E+15	no	0.14	0.03
7/20/98	500	299	82.5	1.521E+14	no	0	0
1/12/99	500	299	81.6	1.547E+14	no	0	0
7/14/99	1200	668	67.1	4.414E+14	no	0.05	1.08
8/28/01	5300	2616	65.4	1.775E+15	yes	0.9	0
9/18/02	360		97.5	1.061E+14	yes	0	0
10/29/02	13000		64.8	8.939E+15	yes	0.67	0.13
5/28/03	400		16.5	6.108E+14	no	0.21	0.33
6/26/03	260		7.4	5.642E+14	no	0	0
7/22/03	450		12.4	7.756E+14	no	0.03	0
8/4/03	9200	4343	7.5	9.346E+15	no	0.48	0
8/27/03	330		27	4.037E+14	no	0	0
10/7/03	790	455	43.8	4.265E+14	no	0	0
	Positive flow change with same day or prior day precipitation event.						
	Negative or stable flow change with prior day precipitation event.						
	<i>E. Coli</i> Data (not transformed)						

Three of the twenty-five exceedances dates had no precipitation data. The results of the study suggest that as many as 15 of the 22 violations with precipitation data (68%) could be related to runoff events.

Additional information regarding the nature of the violation can be gleaned from looking at the flow conditions under which the violations occur. Twelve of the exceedances occurred during high or transitional flows. Nine exceedances, including the violation requiring the highest load reduction, occurred during normal flows. Only four exceedances occurred in the range of low flows.

Appendix E
(TMDL scenario with WLA increased by a factor of 5)

The following tables represent a TMDL scenario where the WLA has been increased by a factor of five. This scenario was presented to the public and is intended to be appended to the originally submitted TMDL report. Since the discharge is meeting water quality standards at the end of pipe, the expanded WLA has virtually no impact on nonpoint source reductions and the expanded WLA is still only total 2 % of the entire TMDL, including this expanded and public-noticed WLA in the TMDL report gives Virginia flexibility to accommodate future expansions and/or additional discharges in an efficient manner.

Table A - Average annual *E. coli* loads and TMDL for South Mayo River watershed (cfu/yr)

WLA ¹	LA	MOS	TMDL
5.200 x 10 ¹²	2.598 x 10 ¹⁴	(implicit)	2.650 x 10 ¹⁴

¹ The point source permitted to discharge in the South Mayo River watershed are presented in section 5.2.

Table B - TMDL and required reduction for South Mayo River

Allowable Loads (cfu/yr)		Average Annual EC Load (cfu/yr)	Required Reduction
Waste Load Allocation (WLA)	5.200 x 10 ¹²		
Load Allocation (LA)	2.598 x 10 ¹⁴		
MOS	(implicit)		
TMDL (annual average)	2.650 x 10¹⁴	1.46 x 10¹⁶	98.22%

Table C - Average annual load distribution, reduction, and allowable load by source

	Total (cfu/yr)	Human @ 18.35% (cfu/yr)	Pet @ 28.83% (cfu/yr)	Livestock @ 34.42% (cfu/yr)	Wildlife @ 18.40% (cfu/yr)
Average Annual Load	1.46 x 10¹⁶	2.68 x 10¹⁵	4.21 x 10¹⁵	5.03 x 10¹⁵	2.69 x 10¹⁵
Reduction	98.22%	98.22%	98.22%	98.22%	98.22%
Allowable Annual Load	2.598 x 10¹⁴	4.77 x 10¹³	7.49 x 10¹³	8.95 x 10¹³	4.79 x 10¹³