

Appendix H: Town Run – Justification for a 4B Alternative

Impairment of biological water quality standards and high ammonia concentrations have been measured in Town Run, a tributary to White Oak Creek at river mile (RM) 6.95. Town Run is a high gradient bedrock substrate headwater stream that is fed by ground water. The city of Georgetown wastewater treatment plant (WWTP) discharges to Town Run at RM 0.80. The biological impairment and high ammonia concentrations are resulting from the Georgetown WWTP effluent discharge. Ohio EPA proposes that this impairment be handled through a category 4B alternative instead of a total maximum daily load (TMDL). Further details are discussed below. Additional information is available in the main text of the TMDL and in the biological and water quality study publication.

Ohio EPA is addressing the phosphorus and nitrate-nitrite impairments via a TMDL analysis expected to be completed in 2009.

Identification of segment and statement of problem causing the impairment

Ohio EPA measured the water quality in the White Oak Creek watershed in 2006, collecting biological, chemical and physical data. The following paragraph from Ohio EPA's water quality report summarizes the problems observed in Town Run:

“Biological sampling in Town Run (RM 0.9 in 2008) found a marginally good community of macroinvertebrates and a reproducing population of the cold water indicator two-lined salamander upstream from the Georgetown WWTP discharge (RM 0.80). Downstream from the WWTP discharge (RM 0.7 in 2008) the macroinvertebrate community was very poor and there was no observed reproduction of the two-lined salamander. High concentrations of ammonia-N (median of 3.24 mg/L), phosphorus-T (median of 3.04 mg/L), and nitrate-nitrite-N (median of 6.39 mg/L) were recorded downstream from the WWTP discharge in 2006.”

(<http://www.epa.ohio.gov/portals/35/documents/WhiteOakCreekTSD2006.pdf>, p. 9)

During Ohio EPA's water quality survey of the White Oak Creek watershed in 2006, five sets of chemical samples were collected at sites upstream and downstream of the Georgetown WWTP. Upstream of the WWTP, the median value for ammonia was 0.05 mg/L. Downstream of the WWTP, the ammonia value was 3.24 mg/L. The median ammonia value of the Georgetown WWTP effluent was 4.07 mg/L.

Biological impact was significant, resulting in a listing on the 303(d) list. Upstream of the WWTP, Town Run is fully attaining the Aquatic Life Use, but downstream of the WWTP the use is not attained.

Description of pollution controls and how they will achieve water quality standards

Town Run is effluent-dominated downstream from the Georgetown WWTP. The drainage area upstream of the WWTP discharge is only 1.3 square miles.

The median flow of the Georgetown WWTP from 2002-2006 was 0.47 million gallons per day (MGD) with 23.8% (420/1764) of the flow dates being over the facility's design capacity of 0.80 MGD.

The critical period for ammonia in such an effluent-dominated stream is late summer when ambient temperatures are highest and stream flows are lowest. Calculating a load to meet water quality standards during the summer is protective of other time periods. A winter load is calculated to meet the needs of Ohio EPA's permitting program.

By reducing the effluent concentration of ammonia from Georgetown, water quality standards for ammonia and the Aquatic Life Use in Town Run are expected to be met.

The nonpoint source load is zero because of the limited drainage area above the WWTP's discharge point. At the critical condition, no upstream flow would be expected.

Loadings for point sources can be calculated using a mass-balance equation. In this case, since upstream flow equals zero, the allocation for the Georgetown WWTP is equal to the water quality standards (WQS). The ammonia WQS for exceptional warmwater habitat (EWH)/coldwater habitat (CWH) is 0.6 mg/L during summer and 1.93 mg/L during winter.

Thus, the load allocated to the Georgetown WWTP = (WQS) x (Effluent flow) x (conversion factor):

Summer: $0.6 \text{ mg/L} \times 0.8 \text{ MGD} \times (\text{factor}) = 1.82 \text{ kg/day}$

Winter: $1.93 \text{ mg/L} \times 0.8 \text{ MGD} \times (\text{factor}) = 5.85 \text{ kg/day}$

An estimate or projection of the time when WQS will be met

After the Georgetown WWTP meets the new ammonia permit limit (by November 2014), the ammonia limit should be met. The water body is expected to respond to the load reduction, but recovery will not be instantaneous. Ohio EPA will monitor the stream for recovery.

Schedule for implementing pollution controls

The Georgetown NPDES permit expires on February 28, 2010. Prior to that date, Ohio EPA will issue a new permit with a 30-day average limit on effluent ammonia of 0.6 mg/L (summer) and 1.93 mg/L (winter).

Officials at the Georgetown WWTP have contracted with an engineering firm and they have produced a plan to upgrade the WWTP to achieve compliance with the new ammonia limits. The WWTP upgrade will be completed by November 2014.

Ohio EPA will monitor Georgetown's progress toward meeting the permit limits by following up on the construction activity and reviewing monthly effluent reports.

Monitoring plan to track effectiveness of pollution controls

As a part of their NPDES permit, the Georgetown WWTP measures and reports ammonia concentrations in its effluent and in Town Run upstream and downstream of their discharge point. The sampling will be conducted twice per week and reported monthly. The facility's monthly discharge monitoring reports are reviewed by permit staff in Ohio EPA's Southwest District Office. Ohio EPA staff will also conduct facility inspections approximately annually.

After the Georgetown ammonia reductions have been in place for at least one year, Ohio EPA will revisit the area to determine if progress toward meeting the Aquatic Life Use is being made. This work would follow Ohio EPA's protocol for sampling the aquatic biology and chemistry.

Commitment to revise pollution controls, as necessary

The SWDO surface water manager will initiate a reexamination of the implementation strategy if significant progress is not being made by the end of the next NPDES permit cycle for Georgetown.

Ohio EPA will report on the progress of any approved 4B in future 303(d) lists.