



Missouri  
Department of  
Natural Resources

Draft Total Maximum Daily Load (TMDL)  
SUMMARY OF COMMENTS AND RESPONSES

**Gravois Creek**  
**WBID # 1712 and # 1713**

St. Louis County, Mo.

Public Notice  
June 15 – July 30, 2012

Missouri Department of Natural Resources  
Water Protection Program  
PO Box 176  
Jefferson City, MO 65102-0176  
800-361-4827 / 573-751-1300

## INTRODUCTION

U.S. Environmental Protection Agency (EPA) regulations require that total maximum daily loads (TMDLs) be subject to public review (40 CFR 130.7). The Missouri Department of Natural Resources placed the draft Gravois Creek bacteria TMDL on a 45-day public notice and comment period from June 15, 2012 to July 30, 2012. This document summarizes and paraphrases the comments received, provides the department's responses to those comments, and notes any changes made to the final TMDL resulting from comments. All original comments received during the Gravois Creek public notice period are available online on the department's website at <http://dnr.mo.gov/env/wpp/tmdl/1712-1713-gravois-cr-record.htm>. Comments were received from the following groups or individuals:

City of Crestwood  
City of Florissant  
City of Hazelwood  
City of Independence  
City of Springfield  
City of Sunset Hills  
City of Woodson Terrace  
Home Builders Association of St. Louis  
Metropolitan St. Louis Sewer District  
St. Louis County Office of the County Executive

## RESPONSE TO COMMENTS

(Public comments in bold)

1. Comment: **Correction of a data entry error for water body ID no. (WBID) 1712 shows water quality meets the recreational use criterion; the WBID1712 segment of Gravois Creek in the proposed TMDL therefore supports its beneficial use and should be taken off the impaired waters list.**

A similar comment: **The long-term average for *E. coli* within the classified segment is very close to Missouri's standard so a TMDL may not be necessary.**

A similar comment: **Revise the TMDL language because a substantial portion of Gravois Creek is not "impaired."**

A similar comment: **The analysis that has been completed demonstrates that segment 1712 of Gravois Creek is not impaired and that the TMDL is unnecessary. Further, the analysis shows that there is insufficient data to develop a TMDL for segment 1713.**

1. Response: The department appreciates the submittal of corrected data. The department reviewed the data in question and determined that due to a data entry error, an *E. coli* sample collected on Gravois Creek in Aug. 2009 was mistakenly entered into the department's database as being collected in Feb. 2009. The original 303(d) listing of WBID 1712 and 1713 was made

when the listing methodology used a single geomean calculation that combined recreational season data from all available years. The current listing methodology requires five samples within the recreational season of a single year, which due to this date correction, is now available for 2009. Using this corrected dataset, the calculated *E. coli* geomean for the 2009 recreational season is compliant with the whole body contact category B criterion indicating that the 2012 303(d) listing was made in error.

However, more recent data available for the 2014 303(d) assessment cycle do show exceedances of the whole body contact category B criterion and the department is proposing to retain Gravois Creek on the 2014 303(d) List of impaired waters as impaired by *E. coli* bacteria. Despite this confirmation of Gravois Creek's impaired status, the department will not move forward with the Gravois Creek bacteria TMDL as presented during this public notice period. Instead, the department will recalculate load duration curves and allocations for this stream as part of a forthcoming River des Peres watershed-based bacteria TMDL, which will include the River des Peres and other bacteria impaired tributaries of this stream. A separate public notice period will be held once this TMDL has been drafted.

## **2. Other comments.**

2. Response: For the reasons stated in the response to Comment 1, the department will not move forward with the Gravois Creek bacteria TMDL at this time. Since the department is not finalizing the draft Gravois Creek bacteria TMDL, all other comments will not be responded to at this time. All comments received during the public notice period of June 15, 2012 – July 30, 2012 will remain on file with the department and will be included in the administrative record for Gravois Creek.

## **END SUMMARY OF COMMENTS AND RESPONSES**