

Hoke, John

From: Adkins.Tabatha@epamail.epa.gov
Sent: Friday, November 12, 2010 2:23 PM
To: Hoke, John
Subject: Cave Springs Branch TMDL Comments

Attachments: EPA-CSB_ECOREgion ratio nutrient 25th TSS LDCs v5.xls



EPA-CSB_ECOREgion
ratio nutrie...

John,

Comments on Cave Springs Branch. Thanks.

TJ

1. Need to recalculate the loadings/allocation based on the observed flow, USGS gage data at the stateline adjusted for minor difference in drainage area. Model we sent was using synthetic flows which are higher than the observed flows. It would better to use the gage data. Attached is the updated spreadsheet with the measured flow data.

(See attached file: EPA-CSB_ECOREgion ratio nutrient 25th TSS LDCs v5.xls)

2. Page 11, Section 3.1.2, "The other storm water permit (MOR109) authorizes discharges from land disturbances that impact one acre or more that are near valuable water resources." The other storm water permit discussion included language about SWPPP, the information on this one is more vague. Please expand a little, especially due to "near valuable water resource".

3. Section 3, pgs 9-11, Please expand on the CAFO nature of some of these permits. In the WLA section (4.2) please clarify that the CAFO permits are zero discharge and receive zero WLA.

Note:

Header for appendix A.2 doesn't continue on pgs 28-38.

Appendix A.1 uS/cm was never defined.

EPA, 2000 reference sited on pgs 12 and 39 needs to be added to reference section U.S. Code 2009 reference sited on pg 7 needs to be added to reference section NASS references 2008 on pg 12, reference section 2009 EPA 2001a and EPA 2001b references sited on pg 14 needs to be added to reference section Ham 2002 not sited within document Allgood and Persinger 1979 not sited within document

Tabatha Adkins, TMDL Coordinator
Water Quality Management Branch-WWPD,
USEPA Region 7
901 North 5th Street
Kansas City, KS 66101
913.551.7128
adkins.tabatha@epa.gov

EPA comments for the Cave Springs Branch TMDL and Department response

1. Need to recalculate the loadings/allocation based on the observed flow, USGS gage data at the stateline adjusted for minor difference in drainage area. Model we sent was using synthetic flows which are higher than the observed flows. It would better to use the gage data. Attached is the updated spreadsheet with the measured flow data. (See attached file: EPA-CSB_ECO region ratio nutrient 25th TSS LDCsv5.xls)

As requested, the modeling has been updated to use observed flow from the USGS gaging station at the Missouri/Oklahoma stateline, adjusted for minor differences in the drainage area (USGS-07189540, Cave Springs Branch near South West City, MO). The Total Nitrogen (Figure 4) and Total Phosphorus (Figure 5) load duration curves have been updated as a result of the revised modeling. Wasteload allocations for total nitrogen and total phosphorus did not change as a result of the revised model. Therefore, the WLA portions of Table 6 and Table 7 remain unchanged. However, Table 6 and Table 8 have been updated to reflect the revised modeling and updated load capacity (LC) and load allocation (LA) calculations.

2. Page 11, Section 3.1.2, "The other storm water permit (MOR109) authorizes discharges from land disturbances that impact one acre or more that are near valuable water resources." The other storm water permit discussion included language about SWPPP, the information on this one is more vague. Please expand a little, especially due to "near valuable water resource".

Land disturbance stormwater permits issued by the Department require that a SWPPP be developed and implemented. The main difference between the two types of land disturbance permits in the Cave Springs Branch watershed is that the MO-R109 permit is issued for land disturbance activities near "valuable resource waters", the criteria for which are found in "Applicability to Valuable Resource Waters" section of the permit. In the case of Cave Springs Branch, portions of the water body are known to be losing and land disturbance activities within 1000 stream feet of a losing section are required to obtain the MO-R109 permit. The MO-R109 permit has additional requirements for the SWPPP and more stringent effluent limitations for stormwater discharges than the standard land disturbance permit (MO-R10). Clarification regarding the difference between the MO-R109 and MO-R10 land disturbance permits has been added to Section 3.1.2 of the document.

3. Section 3, pgs 9-11, Please expand on the CAFO nature of some of these permits. In the WLA section (4.2) please clarify that the CAFO permits are zero discharge and receive zero WLA.

Additional information regarding the CAFO general permits in the Cave Springs Branch watershed has been added to Section 3.1.2 of the document. In addition, Section 4.2 has been revised to clarify that CAFO permits are zero discharge and receive zero WLA in the TMDL. An additional paragraph has also been added to Section 3.2.1 "Runoff from Agricultural Areas" to describe how animal feeding operations (AFOs) and unpermitted CAFOs are considered under load allocation (LA).

Note:

Header for appendix A.2 doesn't continue on pgs 28-38.

The header for Appendix A.2 has been added to the remainder of the table.

Appendix A.1 uS/cm was never defined.

Microsiemens/centimeter ($\mu\text{S}/\text{cm}$) has been defined in Appendix A.1

EPA, 2000 reference sited on pgs 12 and 39 needs to be added to reference section U.S. Code 2009 reference sited on pg 7 needs to be added to reference section NASS references 2008 on pg 12, reference section 2009 EPA 2001a and EPA 2001b references sited on pg 14 needs to be added to reference section Ham 2002 not sited within document Allgood and Persinger 1979 not sited within document

References to EPA 2000, EPA 2001a and 2001b, EPA 2002 and U.S. Code 2009 have been added to the "References" section of the document. The reference to NASS in the footnote on page 12 has been revised to reflect the most recent date of the information (2009). Ham 2002 and Allgood and Persinger 1979 have been removed from the "References" section as they are not cited in the document.