#### FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Environmental Assessment and Restoration, Bureau of Watershed Restoration

SOUTHEAST DISTRICT • EVERGLADES BASINS

# FINAL TMDL Report

# Fecal Coliform TMDL for the West Palm Beach Canal (WBID 3238)

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#### **Websites**

## Florida Department of Environmental Protection, Bureau of Watershed Restoration

**TMDL Program** 

http://www.dep.state.fl.us/water/tmdl/index.htm

**Identification of Impaired Surface Waters Rule** 

http://www.dep.state.fl.us/legal/Rules/shared/62-303/62-303.pdf

STORET Program

http://www.dep.state.fl.us/water/storet/index.htm

2008 Integrated Report

http://www.dep.state.fl.us/water/docs/2008 Integrated Report.pdf

**Surface Water Quality Standards** 

http://www.dep.state.fl.us/legal/rules/shared/62-302/62-302.pdf

SFWMD South Florida Environmental Report 2012 Executive Summary <a href="http://www.sfwmd.gov/portal/page/portal/pgggrp\_sfwmd\_sfer/portlet\_prevrepo">http://www.sfwmd.gov/portal/page/portal/pg\_grp\_sfwmd\_sfer/portlet\_prevrepo</a> rt/2012\_sfer\_executive\_summary.pdf

#### U.S. Environmental Protection Agency

Region 4: Total Maximum Daily Loads in Florida <a href="http://www.epa.gov/region4/water/tmdl/florida/">http://www.epa.gov/region4/water/tmdl/florida/</a>

**National STORET Program** 

http://www.epa.gov/storet/

#### **Chapter 1: INTRODUCTION**

#### 1.1 Purpose of Report

This report presents the Total Maximum Daily Load (TMDL) for fecal coliform bacteria for the West Palm Beach Canal, located in the Everglades Basin. The freshwater stream was verified as impaired for fecal coliform, and therefore was included on the Verified List of impaired waters for the Everglades Basin that was adopted by Secretarial Order on February 7, 2012. The TMDL establishes the allowable fecal coliform loading to the West Palm Beach Canal that would restore the waterbody so that it meets its applicable water quality criterion for fecal coliform.

#### 1.2 Identification of Waterbody

For assessment purposes, the Florida Department of Environmental Protection (Department) has divided the Everglades Basin into water assessment polygons with a unique **w**ater**b**ody **id**entification (WBID) number for each watershed or stream reach. The West Palm Beach Canal is WBID 3238.

#### 1.2.1 The Unique Nature of South Florida Canals<sup>1</sup>

Developed over the past 100 years, the canal-based water management system in south Florida is one of the world's largest and most complex civil works projects. The South Florida Water Management District (SFWMD) uses over 1,300 water control structures, 64 pump stations, and 2,600 miles of canals to provide flood control, water supply, navigation, water quality improvements, and environmental management.

Canals are built to meet human needs by controlling the water levels and the movement of water from one place to another for water supply, flood control, drainage, and navigation, as well as to provide water needed to sustain natural communities in lakes, rivers, wetlands, and estuaries. One of the primary functions of a canal is to control water levels in order to maintain ground water levels in dry conditions. This is particularly important for water supply needs such as preventing saltwater intrusion. Canals also provide a conduit to remove excess water from drainage basins in wet periods to prevent flooding. They differ greatly in their design, construction, and operation. Canal operations depend primarily on their location, intended function, adjacent land use, and development within the basin.

Water quality in canals is affected by tributary sources, surrounding soil types, topography, ground water interaction, and adjacent land use. In some areas water quality is strongly influenced by ground water seepage. Sediments (soil types) are also known to affect water quality. The soil types surrounding south Florida canals range from the sandy upland soils of the Atlantic Coastal Ridge to the hydric sands, marls, and peats of the Everglades. Topography differs across south Florida, resulting in differences in canal depths, water levels, and flow rates. Water elevations in canals can range from less than 10 feet above sea level to 20 to 60 feet above sea level. Water quality varies greatly among regions of south Florida, individual canals within regions, and sections of the same canal. Compared with natural stream systems that are periodically disturbed through natural processes (such as droughts, fires, floods, and hurricanes), canals are disturbed almost continually by human activities for maintenance,

<sup>&</sup>lt;sup>1</sup> SFWMD. 2010. Canals in South Florida: A Technical Support Document. South Florida Water Management District. West Palm Beach, FL.

including herbicide treatment, mowing, dredging, removing obstructions, and mechanical harvesting.

As artificial conveyances with large variations in flow, stage, and water turnover, canals provide less stable and predictable environments than natural stream systems. South Florida canals must convey large volumes of water during storm events. At the other extreme, during droughts and dry season operations, canals may become stagnant for long periods, with little to no water movement, and water may be absent from some canals.

#### 1.2.2 The West Palm Beach Canal

The L-10/L-12 borrow canal is also called the West Palm Beach Canal west of L-8. The L-10/L-12 borrow canal connects to Lake Okeechobee by way of S-352 at the north end of the canal at the town of Canal Point. The connection of the canal to WCA-1 is by way of S-5A at the southern end of the canal. Although releases can be made from the lake to WCA-1 via S-5A, such releases are rare events. The L-10/L-12 borrow canal also connects, at its southern end, to the L-8 borrow canal by way of S-5AW and thus connect to the WCA when S-5AW is open. The canal is located in Palm Beach County (see **Figures 1.1 and 1.2**).

The area of the West Palm Beach Canal watershed encompasses 73,594 acres. The predominant land uses are approximately 70,688 acres of agriculture and 741 acres of urban and built-up. The climate in Palm Beach County, specifically areas surrounding the West Palm Beach Canal watershed, is subtropical, with annual rainfall averaging approximately 52.27 inches, although rainfall amounts can vary greatly from year to year (Southeast Regional Climate Center [SERCC] 2012). Based on data over a 30-year period (1971–2000), the average summer temperature is 91.0°F, and the average winter temperature is 74.0°F (SERCC 2012). The physiography of the West Palm Beach Canal watershed reflects its location within the Everglades or Southern Florida Coastal Plains ecoregion. The primary soil type present within the watershed is peat (Department 2001). Canal Point and Pahokee are the two population centers that exist within the watershed.

#### 1.3 Background

This report was developed as part of the Department's watershed management approach for restoring and protecting state waters and addressing TMDL Program requirements. The watershed approach, which is implemented using a cyclical management process that rotates through the state's 52 river basins over a 5-year cycle, provides a framework for implementing the TMDL Program—related requirements of the 1972 federal Clean Water Act and the 1999 Florida Watershed Restoration Act (FWRA) (Chapter 99-223, Laws of Florida).

A TMDL represents the maximum amount of a given pollutant that a waterbody can assimilate and still meet water quality standards, including its applicable water quality criteria and its designated uses. TMDLs are developed for waterbodies that are verified as not meeting their water quality standards. They provide important water quality restoration goals that will guide restoration activities.

This TMDL report will be followed by the development and implementation of a restoration plan designed to reduce the amount of fecal coliform that caused the verified impairment of the West Palm Beach Canal. These activities will depend heavily on the active participation of the SFWMD, local governments, businesses, and other stakeholders. The Department will work with these organizations and individuals to undertake or continue reductions in the discharge of pollutants and achieve the established TMDLs for impaired waterbodies.

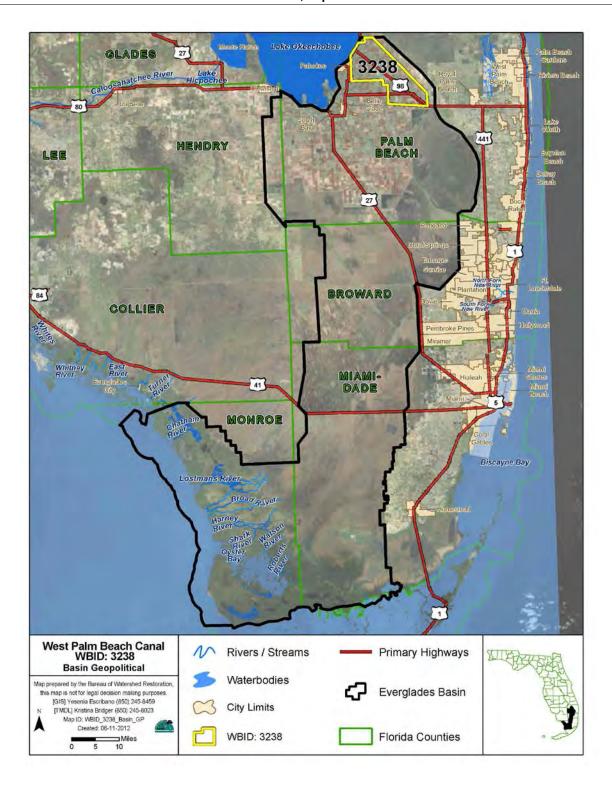


Figure 1.1. Location of the West Palm Beach Canal (WBID 3238)
Watershed in the Everglades Basin and Major Hydrologic and
Geopolitical Features in the Area

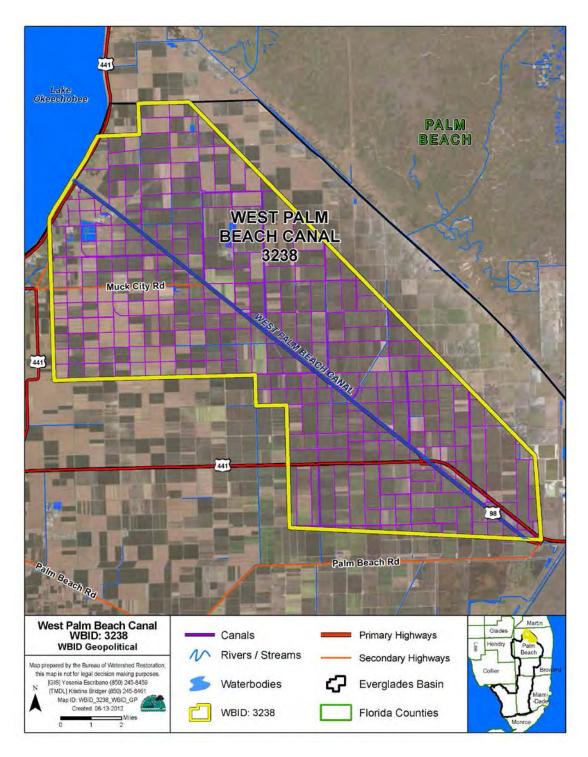


Figure 1.2. Location of the West Palm Beach Canal (WBID 3238)

Watershed in Palm Beach County and Major Geopolitical and
Hydrologic Features in the Area

# Chapter 2: DESCRIPTION OF WATER QUALITY PROBLEM

#### 2.1 Statutory Requirements and Rulemaking History

Section 303(d) of the federal Clean Water Act requires states to submit to the U.S. Environmental Protection Agency (EPA) lists of surface waters that do not meet applicable water quality standards (impaired waters) and establish a TMDL for each pollutant causing the impairment of listed waters on a schedule. The Department has developed such lists, commonly referred to as 303(d) lists, since 1992. The list of impaired waters in each basin, referred to as the Verified List, is also required by the FWRA (Subsection 403.067[4], Florida Statutes [F.S.]); the state's 303(d) list is amended annually to include basin updates.

Florida's 1998 303(d) Consent Decree list included 54 waterbodies in the Southeast Coast and Everglades Basins. The West Palm Beach Canal was one of the waterbodies listed on the 1998 303(d) list. However, the FWRA (Section 403.067, F.S.) stated that all Florida 303(d) lists created before the adoption of the FWRA were for planning purposes only and directed the Department to develop, and adopt by rule, a new science-based methodology to identify impaired waters. After a long rulemaking process, the Environmental Regulation Commission adopted the new methodology as Rule 62-303, Florida Administrative Code (F.A.C.) (Identification of Impaired Surface Waters Rule, or IWR), in April 2001; the rule was modified in 2006 and 2007.

#### 2.2 Information on Verified Impairment

The Department used the IWR to assess water quality impairments in the West Palm Beach Canal and has verified that this waterbody segment is impaired for fecal coliform bacteria based on data collected during the Cycle 2 verified period (January 1, 2004–June 30, 2011). Using the IWR methodology, this waterbody was verified impaired for fecal coliform because more than 10% of the values exceeded the Class III waterbody criterion of 400 counts per 100 milliliters (counts/100mL) for fecal coliform. There were 7 exceedances out of 34 samples. **Table 2.1** summarizes the fecal coliform monitoring results for the Cycle 2 verified period for the West Palm Beach Canal.

To ensure that the fecal coliform TMDL was developed based on current conditions in the canal and that recent trends in the canal's water quality were adequately captured, monitoring data collected from January 1, 2004, to June 30, 2011, were used to develop the TMDL. The data were primarily collected during 2005-2006 and 2008. **Table 2.1** indicates that fecal coliform concentrations exceeding the criterion of 400 counts/100mL have been observed in the West Palm Beach Canal.

Table 2.1. Summary of Fecal Coliform Monitoring Data for the West Palm Beach Canal (WBID 3238) During the Cycle 2 Verified Period (January 1, 2004–June 30, 2011)

Waterbody (WBID)	Parameter	Fecal Coliform Cycle 2
West Palm Beach Canal (WBID 3238)	Total number of samples	34
West Palm Beach Canal (WBID 3238)	IWR-required number of exceedances for the Verified List	7
West Palm Beach Canal (WBID 3238)	Number of observed exceedances	7
West Palm Beach Canal (WBID 3238)	Number of observed nonexceedances	27
West Palm Beach Canal (WBID 3238)	Number of seasons during which samples were collected	4
West Palm Beach Canal (WBID 3238)	Highest observation (counts/100 mL)	33,000
West Palm Beach Canal (WBID 3238)	Lowest observation (counts/100 mL)	2
West Palm Beach Canal (WBID 3238)	Median observation (counts/100 mL)	105
West Palm Beach Canal (WBID 3238)	Mean observation (counts/100 mL)	1,477
-	FINAL ASSESSMENT	Impaired

# Chapter 3. DESCRIPTION OF APPLICABLE WATER QUALITY STANDARDS AND TARGETS

#### 3.1 Classification of the Waterbody and Criterion Applicable to the TMDL

Florida's surface waters are protected for five designated use classifications, as follows:

Class I Potable water supplies
Class II Shellfish propagation or harvesting

Class III Recreation, propagation, and maintenance of a healthy, well-

balanced population of fish and wildlife

Class IV Agricultural water supplies

Class V Navigation, utility, and industrial use (there are no state waters

currently in this class)

The West Palm Beach Canal is a Class III fresh waterbody (IIIF), with a designated use of recreation, propagation, and maintenance of a healthy, well-balanced population of fish and wildlife. The criterion applicable to this TMDL is the Class III criterion for fecal coliform.

#### 3.2 Applicable Water Quality Standards and Numeric Water Quality Target

Numeric criteria for bacterial quality are expressed in terms of fecal coliform bacteria concentration. The water quality criterion for the protection of Class III waters, as established by Rule 62-302, F.A.C., states the following:

#### Fecal Coliform Bacteria:

The most probable number (MPN) or membrane filter (MF) counts per 100 mL of fecal coliform bacteria shall not exceed a monthly average of 200, nor exceed 400 in 10 percent of the samples, nor exceed 800 on any one day.

The criterion states that monthly averages shall be expressed as geometric means based on a minimum of 10 samples taken over a 30-day period. There were insufficient data (fewer than 10 samples in a given month) available to evaluate the geometric mean criterion for fecal coliform bacteria. Therefore, the criterion selected for the TMDL was not to exceed 400 counts/100mL in 10% of the samples.

The Department believes that the implementation of the percent reduction through best management practices (BMPs) required by this TMDL will improve water quality in the canal to meet the water quality criterion. Continued monitoring and assessment efforts by the Department and local stakeholders will provide the data and information necessary to demonstrate whether the canal has been fully restored.

#### **Chapter 4: ASSESSMENT OF SOURCES**

#### 4.1 Types of Sources

An important part of the TMDL analysis is the identification of pollutant source categories, source subcategories, or individual sources of pollutants in the impaired waterbody and the amount of pollutant loadings contributed by each of these sources. Sources are broadly classified as either "point sources" or "nonpoint sources." Historically, the term "point sources" has meant discharges to surface waters that typically have a continuous flow via a discernable, confined, and discrete conveyance, such as a pipe. Domestic and industrial wastewater treatment facilities (WWTFs) are examples of traditional point sources. In contrast, the term "nonpoint sources" was used to describe intermittent, rainfall-driven, diffuse sources of pollution associated with everyday human activities, including runoff from urban land uses, agriculture, silviculture, and mining; discharges from failing septic systems; and atmospheric deposition.

However, the 1987 amendments to the Clean Water Act redefined certain nonpoint sources of pollution as point sources subject to regulation under the EPA's National Pollutant Discharge Elimination System (NPDES) Program. These nonpoint sources included certain urban stormwater discharges, such as those from local government master drainage systems, construction sites over five acres, and a wide variety of industries (see **Appendix A** for background information on the federal and state stormwater programs).

To be consistent with Clean Water Act definitions, the term "point source" will be used to describe traditional point sources (such as domestic and industrial wastewater discharges) and stormwater systems requiring an NPDES stormwater permit when allocating pollutant load reductions required by a TMDL (see **Section 6.1**). However, the methodologies used to estimate nonpoint source loads do not distinguish between NPDES stormwater discharges and non-NPDES stormwater discharges, and as such, this source assessment section does not make any distinction between the two types of stormwater.

### **4.2 Potential Sources of Fecal Coliform within the West Palm Beach Canal WBID Boundary**

#### 4.2.1 Point Sources

#### **Wastewater Point Sources**

There are no NPDES-permitted facilities located within the West Palm Beach Canal WBID boundary that discharge directly to the canal.

#### **Municipal Separate Storm Sewer System Permittees**

The West Palm Beach Canal WBID boundary is not located within the service area of an MS4.

#### **4.2.2 Land Uses and Nonpoint Sources**

Accurately quantifying the fecal coliform loadings from nonpoint sources requires identifying nonpoint source categories, locating the sources, determining the intensity and frequency at which these sources create high fecal coliform loadings, and specifying the relative contributions from these sources. Depending on the land use distribution in a given watershed, frequently cited nonpoint sources in urban areas include failed septic tanks, leaking sewer lines, and pet feces. For a watershed dominated also by rangeland, fecal coliform loadings can come from

the runoff from areas with animal feeding operations or direct animal access to the receiving waters.

In addition to the sources associated with anthropogenic activities, birds and other wildlife can also act as fecal coliform contributors to the receiving waters. While detailed source information is not always available for accurately quantifying the fecal coliform loadings from different sources, land use information can provide some hints on the potential sources of observed fecal coliform impairment.

#### **Land Uses**

The spatial distribution and acreage of different land use categories were identified using the SFWMD's 2004–05 land use coverage contained in the Department's geographic information system (GIS) library. Land use categories within the West Palm Beach Canal WBID boundary were aggregated using the simplified Level 1 codes and tabulated in **Table 4.1**. **Figure 4.1** shows the spatial distribution of the principal land uses.

As shown in **Table 4.1**, the total area within the WBID boundary is about 73,594 acres. The predominant land uses are approximately 70,688 acres (96.1%) of agriculture and 741 acres (1.1%) of urbanized activities including residential (320 acres) and non-residential (421 acres) areas. In WBID 3238, residential areas include low-, medium-, and high-density residential.

Table 4.1. Classification of Land Use Categories within the West Palm Beach Canal (WBID 3238) Boundary, 2004-05

Level 1 Code	Land Use	Acreage	% Acreage
1000	Urban and built-up: non-residential	421	0.6%
1100	Low-density residential	126	0.2%
1200	Medium-density residential	186	0.3%
1300	High-density residential	8	0.01%
2000	Agriculture	70,688	96.1%
3000	Rangeland	42	0.1%
4000	Upland forest	10	0.01%
5000	Water	957	1.3%
6000	Wetland	321	0.4%
7000	Barren land	550	0.7%
8000	Transportation, communication, and utilities	285	0.4%
-	TOTAL	73,594	100.0%

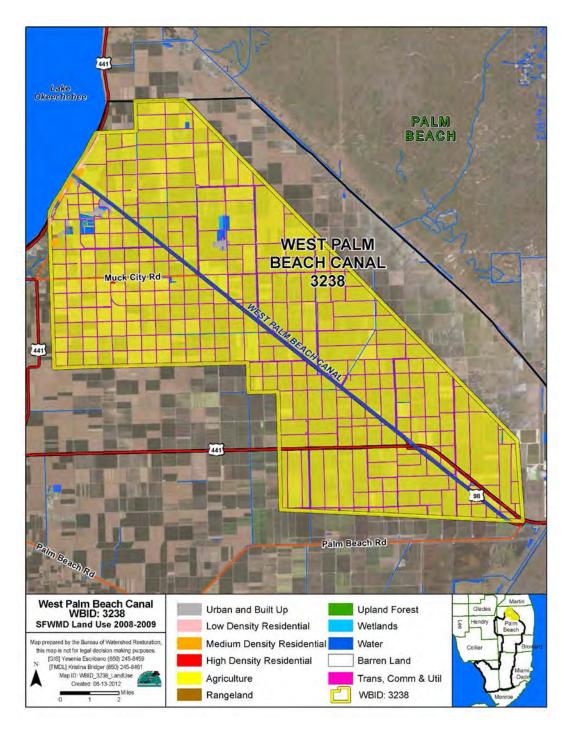


Figure 4.1. Principal Land Uses within the West Palm Beach Canal (WBID 3238) Watershed Boundary, 2004-05

#### **Sources of Fecal Coliform Loads**

Nonpoint sources of coliform are diffuse sources that cannot be identified as entering a waterbody through a discrete conveyance at a single location. These sources generally, but not always, involve accumulation of bacteria on land surfaces and wash off as a result of storm events. In the West Palm Beach Canal watershed typical nonpoint sources of coliform bacteria include:

- Wildlife
- Agricultural animals
- Onsite Sewer Treatment and Disposal Systems (septic tanks)
- Sanitary Sewer Overflows
- Urban development

#### WILDLIFE

Wildlife contribute coliform bacteria by depositing feces onto land surfaces where it can be transported to nearby streams during storm events and by direct deposition to the waterbody by birds and other warm blooded animals. Bacteria originating from local wildlife are generally considered to represent natural background concentrations. In most impaired watersheds, the contribution from wildlife is small relative to the load from urban and agricultural areas. Approximately 10 acres of the land area within WBID 3238 is designated as forested and 1,278 acres of the land area is designated as either water or wetlands. Although a low percentage (1.7%) of natural land use exists in and surrounding WBID 3238, wildlife could be a potential source of bacteria to West Palm Beach Canal.

#### AGRICULTURE

Agriculture is a potential source of coliform delivery to streams and canals, including runoff of manure from pastureland and cropland, and direct animal access to streams. Approximately 96 percent of the total land area within WBID 3238 is designated as agricultural. With a high percentage of agricultural land use activities occurring within the WBID, it could be a potential source of pathogen loading to the West Palm Beach Canal.

The predominant type of agriculture in the West Palm Beach Canal watershed is sugar cane farming. When the sugar cane is harvested, workers are provided portable restroom facilities. A potential source of fecal coliform loading to the West Palm Beach Canal is improper disposal of the portable restroom facility waste into the canal. It was noted by some local entities at the Everglades Basin TMDL Public Workshop held on Friday, August 17, 2012 that improper waste disposal may be occurring within the watershed given the high fecal coliform concentrations (counts/100mL). However, further investigation into this potential source is needed.

#### ONSITE SEWERAGE TREATMENT AND DISPOSAL SYSTEMS (SEPTIC TANKS)

Onsite sewage treatment and disposal systems (OSTDs), including septic tanks, are commonly used where providing sewer systems access is not cost effective or practical. When properly sited, designed, constructed, maintained, and operated, OSTDs are a safe means of disposing of domestic waste. The effluent from a well-functioning OSTD is comparable to secondarily treated wastewater from a sewage treatment plant. Effluent from a well-functioning septic tank located in sand and gravel sediment types may also contribute fecal coliform loadings. When not functioning properly, OSTDs can be a source of nutrients, pathogens, and other pollutants to both ground water and surface water.

#### **SANITARY SEWER OVERFLOWS**

Human sewage can be introduced into surface waters even when storm and sanitary sewers are separated. Leaks and overflows are common in many older sanitary sewers where capacity is exceeded, high rates of infiltration and inflow occur (i.e., outside water gets into pipes, reducing capacity), frequent blockages occur, or sewers are simply falling apart due to poor joints or pipe materials. Power failures at pumping stations are also a common cause of SSOs. The greatest risk of an SSO occurs during storm events; however, few comprehensive data are available to quantify SSO frequency and bacteria loads in most watersheds.

#### **URBAN AREAS/PERVIOUS**

Urban areas include land uses such as residential, industrial, utility swaths, extractive and commercial. Fecal coliform loading from urban areas (whether within an MS4 jurisdiction or not) is attributable to multiple sources including storm water runoff, illicit discharges of sanitary waste, runoff from improper disposal of waste materials, leaking septic systems, and domestic animals. Approximately 1.1 percent of the total land area within WBID 3238 is designated as urban. Although developed land use represents only a small percentage of the total land use, it is located immediately adjacent to West Palm Beach Canal. As such, urban and transportation land uses could be a relevant source of pathogen loading to the West Palm Beach Canal.

A preliminary quantification of the fecal coliform loadings from pet feces and septic tanks was conducted to demonstrate the relative contributions. **Appendix B** provides detailed load estimates and describes the methods used for the quantification. It should be noted that the information included in the appendix has been only used to demonstrate the possible relative contributions from different sources. The loading estimates have not been used in establishing the final TMDL.

# Chapter 5: DETERMINATION OF ASSIMILATIVE CAPACITY

#### 5.1 Determination of Loading Capacity

When continuous flow measurements in a watershed are available, a bacteria TMDL can be developed using the load duration curve method, which was developed by the Kansas Department of Health and Environment and provides daily bacteria load. However, flow data were not available for the West Palm Beach Canal; therefore, the fecal coliform TMDL was developed using the "percent reduction" approach. Using the "percent reduction" method, the percent reduction needed to meet the applicable criterion is calculated based on the 90<sup>th</sup> percentile of all measured concentrations collected during the Cycle 2 verified period (January 1, 2004–June 30, 2011).

Because bacteriological counts in water are not normally distributed, a nonparametric method is more appropriate for the analysis of fecal coliform data (Hunter 2002). The Hazen method, which uses a nonparametric formula, was used to determine the 90<sup>th</sup> percentile. The EPA Region 4 uses this method to develop fecal coliform TMDLs. The percent reduction of fecal coliform needed to meet the applicable criterion was calculated as described in **Section 5.1.3**.

#### 5.1.1 Data Used in the Determination of the TMDL

The table and figures presented in this section provide the station locations and time series data for fecal coliform bacteria collected in West Palm Beach Canal (WBID 3238). **Table 5.1** provides a list of the water quality monitoring stations in WBID 3238, including the number of observations, date range, and summary statistics for the Cycle 2 verified period (January 1, 2004–June 30, 2011). **Table 5.2** summarizes the descriptive statistics for the fecal coliform data for the West Palm Beach Canal (WBID 3238) collected during the Cycle 2 verified period. **Figure 5.1** illustrates where the IWR stations are located within the WBID.

This analysis focuses on fecal coliform data collected from January 1, 2004 to June 30, 2011. The majority of the data was collected in 2005-2006 and 2008. During this period, 34 fecal coliform samples were collected from eight sampling stations in the WBID. Samples from five sampling stations exceeded the Class III fecal coliform criterion of 400 counts/100mL. For the WBID, concentrations ranged from 2 to 33,000 counts/100mL, with a median value of 105 counts/100mL, and averaged 1.477 counts/100mL during this period.

Table 5.1. Water Quality Monitoring Stations for West Palm Beach
Canal (WBID 3238) for the Cycle 2 Verified Period (January
1, 2004 -June 30, 2011)

Station	N	Mean	Median	Min	Max	# Samples Exceeding 400 counts/100mL	Begin Date	End Date
21FLGW 35009	1	26	26	26	26	0	2008	2008
21FLGW 35018	1	2	2	2	2	0	2008	2008
21FLWPB 28010362	5	344	230	30	909	2	2001	2006
21FLWPB 28010639	5	498	109	10	2000	1	2004	2006
21FLWPB 28010899	5	284	73	45	1055	1	2001	2006
21FLWPB 28010964	8	4333	75	10	33000	2	2005	2006
21FLWPB 28010965	7	1347	50	10	8636	1	2005	2006
21FLWPB 28010966	2	245	245	200	290	0	2005	2005

Table 5.2. Descriptive Statistics of Fecal Coliform Data for the West Palm Beach Canal (WBID 3238) for the Cycle 2 Verified Period (January 1, 2004–June 30, 2011)

Descriptive Statistic	Result
Mean observation (counts/100mL)	1,477
Median observation (counts/100mL)	105
Highest observation (counts/100mL)	33,000
Lowest observation (counts/100mL)	2
25% quartile	38
75% quartile	358
Number of samples	34

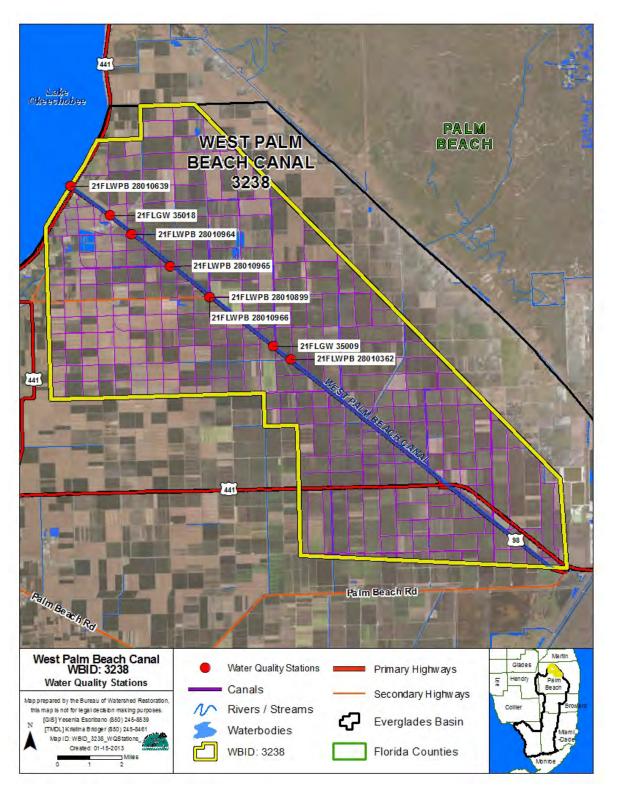
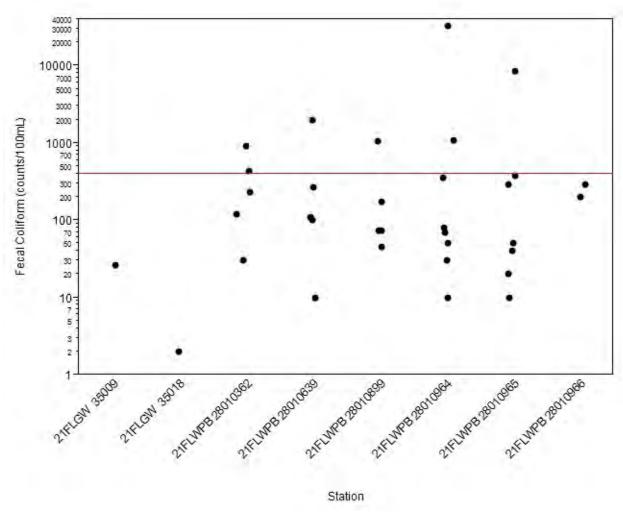


Figure 5.1. Location of Water Quality Stations with Fecal Coliform Data in the West Palm Beach Canal (WBID 3238)

#### **Spatial Patterns**

Fecal coliform data from water quality sampling stations for the Cycle 2 verified period (January 1, 2004–June 30, 2011) were analyzed to detect spatial trends (**Figure 5.2** and **Table 5.1**). The data were collected in 2005-2006 and 2008. During this period, 5 of 8 water quality stations exceeded the fecal coliform criterion of 400 counts/100mL: The highest fecal coliform concentrations were found at sampling stations 21FL 21FLWPB28010964 and 21FLWPB28010965. The land use surrounding these stations is primarily agriculture and urban built-up (**Figure 5.3**).



The red line indicates the target concentration (400 counts/100mL).

Figure 5.2. Fecal Coliform Concentration Spatial Trends in the West Palm Beach Canal (WBID 3238) During the Cycle 2 Verified Period (January 1, 2004–June 30, 2011)

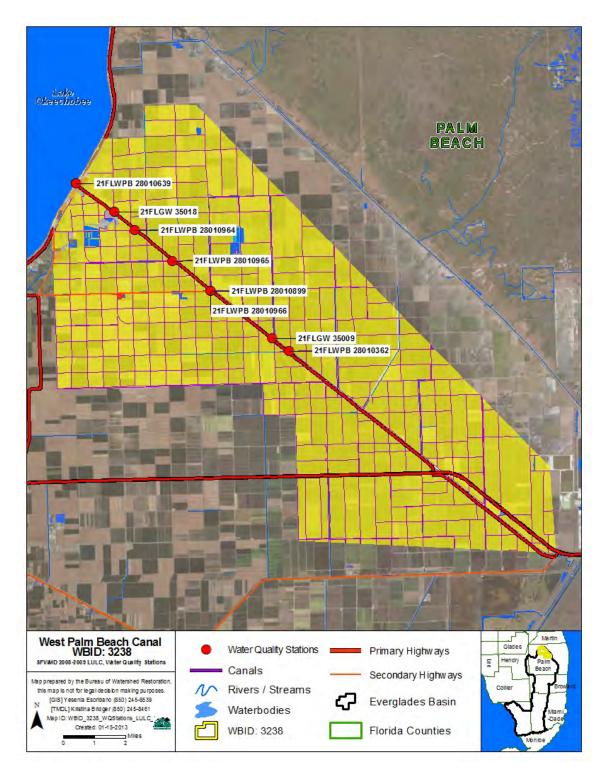


Figure 5.3. Location of Water Quality Stations with Fecal Coliform Data and Surrounding Land Uses in the West Palm Beach Canal (WBID 3238) Watershed

#### **Temporal Patterns**

#### **MONTHLY AND SEASONAL TRENDS**

Using rainfall data collected at the CLimate Information for Management and Operational Decisions (CLIMOD) station located in Canal Point USDA, Florida (081276) (available: <a href="http://climod.meas.ncsu.edu/">http://climod.meas.ncsu.edu/</a>), it was possible to compare monthly rainfall from 2004 to 2011 with monthly fecal coliform exceedance rates for the same period, as well as average quarterly rainfall with average quarterly fecal coliform exceedance rates (**Figures 5.4** and **5.5**).

High fecal coliform concentrations exceeding the fecal coliform criterion of 400 counts/100mL were observed in January - April. However, data was only available for 7 months out of the entire year. Fecal coliform data were collected in January – April, June – July, and December. It should be noted that the highest fecal coliform concentrations were observed in February (8,636 counts/100mL) and April (33,000 counts/100mL). The monthly average rainfall for February and April was 2.43 and 2.65 inches, respectively. High fecal coliform concentrations were observed during large and non-measurable precipitation events. Conversely, non-exceedances of the fecal coliform criterion were observed during extreme, medium, small, and non-measurable precipitation events. Between June and July a total of 5 fecal coliform samples were collected in the West Palm Beach Canal. None of the 5 samples exceeded the fecal coliform criterion of 400 counts/100mL. The monthly average rainfall for June and July was 7.16 and 6.63 inches, respectively. **Tables 5.3a** and **5.3b** summarize monthly and seasonal fecal coliform averages and percent exceedances for the data collected from 2004 to 2011.

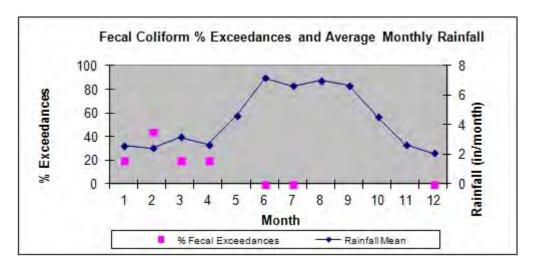


Figure 5.4. Fecal Coliform Exceedances and Rainfall in the West Palm Beach Canal (WBID 3238) by Month during the Cycle 2 Verified Period (January 1, 2004–June 30, 2011)

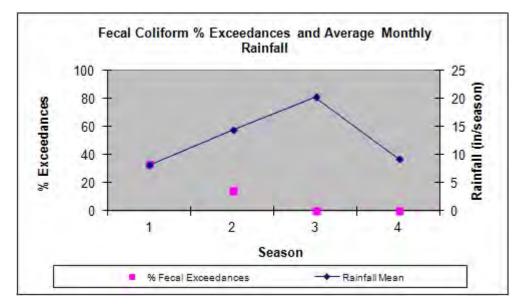


Figure 5.5. Fecal Coliform Exceedances and Rainfall in the West Palm Beach Canal (WBID 3238) by Season during the Cycle 2 Verified Period (January 1, 2004–June 30, 2011)

Table 5.3a. Summary Statistics of Fecal Coliform Data in the West Palm Beach Canal (WBID 3238) by Month during the Cycle 2 Verified Period (January 1, 2004–June 30, 2011)

Month	N	Mean <sup>1</sup>	Median <sup>1</sup>	Min <sup>1</sup>	Max¹	# of Exceedances <sup>2</sup>	% Fecal Exceedances	Rainfall Mean (inches)
1	5	126	73	10	430	1	20	2.59
2	9	1433	350	30	8636	4	44	2.43
3	5	459	80	20	2000	1	20	3.17
4	5	6627	45	10	33000	1	20	2.65
5								4.63
6	2	14	14	2	26	0	0	7.16
7	3	97	50	40	200	0	0	6.63
8								6.99
9								6.67
10							-	4.58
11							-	2.68
12	5	191	173	70	380	0	0	2.1

<sup>- =</sup> Empty cell/no data

Table 5.3b. Summary Statistics of Fecal Coliform Data in the West Palm Beach Canal (WBID 3238) by Season during the Cycle 2 Verified Period (January 1, 2004–June 30, 2011)

Season	N	Min¹	Max <sup>1</sup>	Median <sup>1</sup>	Mean <sup>1</sup>	# of Exceedances <sup>2</sup>	% Fecal Exceedances	Rainfall Mean (inches)
1	18	10	8636	280	879	6	33	8.19
2	7	2	33000	30	4738	1	14	14.44
3	3	40	200	50	97	0	0	20.29
4	5	70	380	173	191	0	0	9.36

<sup>&</sup>lt;sup>1</sup> Coliform counts are #/100 mL.

<sup>&</sup>lt;sup>1</sup> Coliform counts are #/100mL.

<sup>&</sup>lt;sup>2</sup> Exceedances represent values above 400 counts/100mL.

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#### **Hydrologic Condition**

As no current flow data were available, hydrologic conditions were analyzed using rainfall. A loading curve—type chart that would normally be applied to flow events was created using precipitation data from the Canal Point USDA CLIMOD station (081276). The chart was divided in the same manner as if flow were being analyzed, where extreme precipitation events represent the upper percentiles (0–5<sup>th</sup> percentile), followed by large precipitation events (5<sup>th</sup>–10<sup>th</sup> percentile), medium precipitation events (10<sup>th</sup>–20<sup>th</sup> percentile), small precipitation events (20<sup>th</sup>–40<sup>th</sup> percentile), and no recordable precipitation events (40<sup>th</sup>–100<sup>th</sup> percentile). Three-day (the day of and 2 days prior to sampling) precipitation accumulations were used in the analysis (**Table 5.4** and **Figure 5.6**).

During the Cycle 2 Verified Period (January 1, 2004 – June 30, 2011), fecal coliform data was collected during all hydrologic condition precipitation events (extreme, large, medium, small, and none/non-measurable). High fecal coliform concentrations were observed during large and non-measurable precipitation events. Non-exceedances of the fecal coliform criterion were observed during extreme, medium, small, and none/non-measurable precipitation events.

Table 5.4. Summary of Fecal Coliform Data in the West Palm Beach Canal (WBID 3238) by Hydrologic Condition Based on Three-Day Precipitation

					Number of	
Precipitation	<b>Event Range</b>	Total	Number of	Percent	Non-	Percent Non-
Event	(Percentile)	Samples	Exceedances	Exceedance	Exceedances	Exceedance
None/Not						
Measurable	60 - 100	22	3	14%	19	86%
Small	40 - 60	2	0	0%	2	100%
Medium	10 - 40	1	0	0%	1	100%
Large	5 - 10	4	4	100%	0	0%
Extreme	0 - 5	5	0	0.0%	5	100.0%

<sup>&</sup>lt;sup>1</sup> Exceedances represent values above 400 counts/100mL.

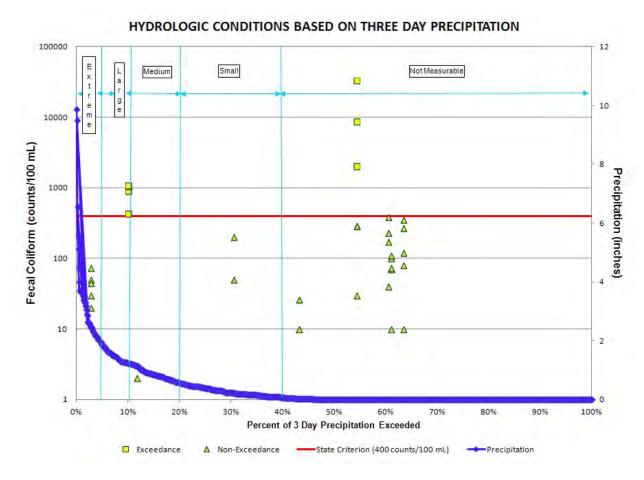


Figure 5.6. Fecal Coliform Data by Hydrologic Condition in the West Palm Beach Canal (WBID 3238) Based on Three-Day Precipitation

#### 5.1.2 Critical Conditions

The critical condition for coliform loadings in a given watershed depends on many factors, including the presence of point sources and the land use pattern in the watershed. The critical condition for point source loading typically occurs during periods of low stream flow, when dilution is minimized. Typically, the critical condition for nonpoint sources is an extended dry period followed by a rainfall runoff event. During the wet weather period, rainfall washes off coliform bacteria that have built up on the land surface under dry conditions, resulting in the wet weather exceedances. However, significant nonpoint source contributions can also appear under dry conditions without any major surface runoff event. This usually happens when nonpoint sources contaminate the surficial aquifer, and fecal coliform bacteria are brought into the receiving waters through baseflow. In addition, the fecal coliform contribution of wildlife and livestock with direct access to the receiving water can be more noticeable during dry weather.

High fecal coliform concentrations exceeding the criterion of 400 counts/100mL were observed during large and non-measurable rainfall events. Non-exceedances of the fecal coliform criterion were observed during extreme, medium, small, and none/non-measurable precipitation

events. Therefore, the fecal coliform target established for this TMDL applies to all rainfall conditions.

#### **5.1.3 TMDL Development Process**

Due to the lack of supporting information, mainly flow data, a simple reduction calculation was performed to determine the reduction in fecal coliform concentration necessary to achieve the concentration target (400 counts/100mL). The percent reduction needed to reduce pollutant load was calculated by comparing the existing concentrations and target concentration using **Formula 1**:

Using the Hazen method for estimating percentiles as described in Hunter (2002), the existing condition concentration was defined as the 90<sup>th</sup> percentile of all the fecal coliform data collected during the Cycle 2 verified period (January 1, 2004–June 30, 2011). The 90<sup>th</sup> percentile is also called the 10% exceedance event. This will result in a target condition that is consistent with the state bacteriological water quality assessment threshold for Class III waters.

In applying this method, all of the available data are ranked (ordered) from the lowest to the highest (**Table 5.5**) and **Formula 2** is used to determine the percentile value of each data point:

If none of the ranked values are shown to be the 90<sup>th</sup> percentile value, then the 90<sup>th</sup> percentile number (used to represent the existing condition concentration) is calculated by interpolating between the 2 data points adjacent (above and below) to the desired 90<sup>th</sup> percentile rank using **Formula 3**:

Where:

*C*<sub>lower</sub> is the fecal coliform concentration corresponding to the percentile lower than the 90<sup>th</sup> percentile;

 $P_{90th}$  is the percentile difference between the  $90^{th}$  percentile and the percentile number immediately lower than the  $90^{th}$  percentile (90% - percentile  $l_{lower} = P_{90th}$ ); and

R is a ratio defined as R= (fecal coliform concentration  $_{lower}$ )-(percentile  $_{upper}$  - percentile  $_{lower}$ ).

To calculate R, the percentile values below and above the 90<sup>th</sup> percentile were identified. Next, the fecal coliform concentrations corresponding to the lower and upper percentile values were identified. Then, the fecal coliform concentration difference between the lower and upper percentiles was then calculated and divided by the unit percentile. The unit percentile difference is the difference between the lower and upper percentiles. R was then calculated as

(fecal coliform concentration  $_{lower}$ ) – fecal coliform concentration  $_{lower}$ )/(percentile  $_{lower}$ ) – percentile  $_{lower}$ ) = R.

Then C<sub>lower</sub>, P<sub>90th</sub>, and R are substituted into **Formula 3** to calculate the 90<sup>th</sup> percentile fecal coliform concentration. The 90<sup>th</sup> percentile fecal coliform concentration is 1,070 counts/100mL.

Using **Formula 1**, the percent reduction for the period of observation (2004–2011) was calculated as 63% for the West Palm Beach Canal (i.e., % reduction needed = [(1,070-400)/1,070]\*100 = 63%).

**Table 5.5** shows the individual fecal coliform data, the ranks, the percentiles for each individual data, the existing 90<sup>th</sup> percentile concentration, the allowable concentration (400 counts/100mL), and the percent reduction needed to meet the applicable water quality criterion for fecal coliform.

Table 5.5. Calculation of Fecal Coliform Reductions for the West Palm Beach Canal (WBID 3238) TMDL Based on the Hazen Method

		Fecal Coliform		
Station	Date	Concentration (MPN/100mL)	Rank	Percentile by Hazen Method
21FLGW 35018	6/5/2008	2	1	1%
21FLWPB 28010964	1/24/2006	10	2	4%
21FLWPB 28010965	1/24/2006	10	3	7%
21FLWPB 28010639	4/25/2006	10	4	10%
21FLWPB 28010965	3/21/2006	20	5	13%
21FLGW 35009	6/5/2008	26	6	16%
21FLWPB 28010964	2/11/2005	30	7	19%
21FLWPB 28010362	4/25/2006	30	8	22%
21FLWPB 28010965	7/7/2005	40	9	25%
21FLWPB 28010899	4/25/2006	45	10	28%
21FLWPB 28010965	4/25/2006	50	11	31%
21FLWPB 28010964	7/7/2005	50	12	34%
21FLWPB 28010964	12/21/2005	70	13	37%
21FLWPB 28010899	1/24/2006	73	14	40%
21FLWPB 28010899	3/21/2006	73	15	43%
21FLWPB 28010964	3/21/2006	80	16	46%
21FLWPB 28010639	12/21/2005	100	17	49%
21FLWPB 28010639	1/24/2006	109	18	51%
21FLWPB 28010362	3/21/2006	120	19	54%
21FLWPB 28010899	12/21/2005	173	20	57%
21FLWPB 28010966	7/7/2005	200	21	60%
21FLWPB 28010362	12/21/2005	230	22	63%
21FLWPB 28010639	2/9/2006	270	23	66%

Station	Date	Fecal Coliform Concentration (MPN/100mL)	Rank	Percentile by Hazen Method
21FLWPB 28010965	2/28/2005	290	24	69%
21FLWPB 28010966	2/28/2005	290	25	72%
21FLWPB 28010964	2/9/2006	350	26	75%
21FLWPB 28010965	12/21/2005	380	27	78%
21FLWPB 28010362	1/24/2006	430	28	81%
21FLWPB 28010362	2/9/2006	909	29	84%
21FLWPB 28010899	2/9/2006	1055	30	87%
21FLWPB 28010964	2/28/2005	1070	31	90%
21FLWPB 28010639	3/21/2006	2000	32	93%
21FLWPB 28010965	2/9/2006	8636	33	96%
21FLWPB 28010964	4/25/2006	33000	34	99%
90 <sup>th</sup> percentile (counts/100mL)				1,070
Allowable concentration (counts/100mL)				400
Final % reduction				63%

#### **Chapter 6: DETERMINATION OF THE TMDL**

#### 6.1 Expression and Allocation of the TMDL

The objective of a TMDL is to provide a basis for allocating acceptable loads among all of the known pollutant sources in a watershed so that appropriate control measures can be implemented and water quality standards achieved. A TMDL is expressed as the sum of all point source loads (wasteload allocations, or WLAs), nonpoint source loads (load allocations, or LAs), and an appropriate margin of safety (MOS), which takes into account any uncertainty concerning the relationship between effluent limitations and water quality:

#### $TMDL = \sum WLAs + \sum LAs + MOS$

As discussed earlier, the WLA is broken out into separate subcategories for wastewater discharges and stormwater discharges regulated under the NPDES Program:

TMDL 
$$\cong \Sigma$$
 WLAS<sub>wastewater</sub> +  $\Sigma$  WLAS<sub>NPDES</sub> Stormwater +  $\Sigma$  LAS + MOS

It should be noted that the various components of the revised TMDL equation may not sum up to the value of the TMDL because (a) the WLA for NPDES stormwater is typically based on the percent reduction needed for nonpoint sources and is also accounted for within the LA, and (b) TMDL components can be expressed in different terms (for example, the WLA for stormwater is typically expressed as a percent reduction, and the WLA for wastewater is typically expressed as mass per day).

WLAs for stormwater discharges are typically expressed as "percent reduction" because it is very difficult to quantify the loads from MS4s (given the numerous discharge points) and to distinguish loads from MS4s from other nonpoint sources (given the nature of stormwater transport). The permitting of stormwater discharges also differs from the permitting of most wastewater point sources. Because stormwater discharges cannot be centrally collected, monitored, and treated, they are not subject to the same types of effluent limitations as wastewater facilities, and instead are required to meet a performance standard of providing treatment to the "maximum extent practical" through the implementation of BMPs.

This approach is consistent with federal regulations (40 CFR § 130.2[I]), which state that TMDLs can be expressed in terms of mass per time (e.g., pounds per day), toxicity, or other appropriate measure. The TMDL for the West Palm Beach Canal is expressed in terms of counts/day and percent reduction, and represents the maximum daily fecal coliform load the canal can assimilate without exceeding the fecal coliform criterion (**Table 6.1**).

### Table 6.1. TMDL Components for Fecal Coliform in the West Palm Beach Canal (WBID 3238)

N/A = Not applicable

	TMDL	WLA for Wastewater	WLA for NPDES Stormwater	LA	
Parameter	(counts/100mL)	(counts/100mL)	(% reduction)	(% reduction)	MOS
Fecal coliform	400	N/A	N/A	63%	Implicit

#### 6.2 Load Allocation

Based on a percent reduction approach, the load allocation is a 63% reduction in fecal coliform from nonpoint sources. It should be noted that the LA includes loading from stormwater discharges regulated by the Department and the water management district that are not part of the NPDES Stormwater Program (see **Appendix A**).

#### 6.3 Wasteload Allocation

#### 6.3.1 NPDES Wastewater Discharges

No NPDES-permitted wastewater facilities were permitted to discharge within the West Palm Beach Canal WBID boundary. The state already requires all NPDES point source dischargers to meet bacteria criteria at the end of the pipe. It is the Department's current practice not to allow mixing zones for bacteria. These requirements will also be applied to any possible future point sources that may discharge in the WBID to meet end-of-pipe standards for coliform bacteria.

#### 6.3.2 NPDES Stormwater Discharges

The West Palm Beach Canal watershed is not located within the service area of an MS4. Therefore, the WLA for stormwater discharges with an MS4 permit is a not applicable in the West Palm Beach Canal watershed. It should be noted that any MS4 permittee is only responsible for reducing the anthropogenic loads associated with stormwater outfalls that it owns or otherwise has responsible control over, and it is not responsible for reducing other nonpoint source loads in its jurisdiction.

#### 6.4 Margin of Safety

Consistent with the recommendations of the Allocation Technical Advisory Committee (Department 2001), an implicit MOS was used in the development of this TMDL by not subtracting contributions from natural sources and sediments when the percent reduction was calculated. This makes the estimation of human contribution more stringent and therefore adds to the MOS.

## **Chapter 7: TMDL IMPLEMENTATION**

## 7.1 Basin Management Action Plan

Following the adoption of this TMDL by rule, the Department will determine the best course of action regarding its implementation. Depending upon the pollutant(s) causing the waterbody impairment and the significance of the waterbody, the Department will select the best course of action leading to the development of a plan to restore the waterbody. Often this will be accomplished cooperatively with stakeholders by creating a Basin Management Action Plan, referred to as the BMAP. Basin Management Action Plans are the primary mechanism through which TMDLs are implemented in Florida [see Subsection 403.067(7) F.S.]. A single BMAP may provide the conceptual plan for the restoration of one or many impaired waterbodies.

If the Department determines a BMAP is needed to support the implementation of this TMDL, a BMAP will be developed through a transparent stakeholder-driven process intended to result in a plan that is cost-effective, technically feasible, and meets the restoration needs of the applicable waterbodies. Once adopted by order of the Department Secretary, BMAPs are enforceable through wastewater and municipal stormwater permits for point sources and through BMP implementation for nonpoint sources. Among other components, BMAPs typically include the following:

- Water quality goals (based directly on the TMDL);
- Refined source identification;
- Load reduction requirements for stakeholders (quantitative detailed allocations, if technically feasible);
- A description of the load reduction activities to be undertaken, including structural projects, nonstructural BMPs, and public education and outreach;
- A description of further research, data collection, or source identification needed in order to achieve the TMDL;
- Timetables for implementation;
- Implementation funding mechanisms;
- An evaluation of future increases in pollutant loading due to population growth;
- Implementation milestones, project tracking, water quality monitoring, and adaptive management procedures; and
- Stakeholder statements of commitment (typically a local government resolution).

BMAPs are updated through annual meetings and may be officially revised every five years. Completed BMAPs in the state have improved communication and cooperation among local stakeholders and state agencies; improved internal communication within local governments; applied high-quality science and local information in managing water resources; clarified obligations of wastewater point source, MS4, and non-MS4 stakeholders in TMDL implementation; enhanced transparency in Department decision making; and built strong relationships between the Department and local stakeholders that have benefited other program areas.

## 7.2 Other TMDL Implementation Tools

However, in some basins, and for some parameters, particularly those with fecal coliform impairments, the development of a BMAP using the process described above will not be the most efficient way to restore a waterbody, such that it meets its designated uses. This is because fecal coliform impairments result from the cumulative effects of a multitude of potential sources, both natural and anthropogenic. Addressing these problems requires good old-fashioned detective work that is best done by those in the area.

Many assessment tools are available to assist local governments and interested stakeholders in this work. The tools range from the simple (such as Walk the WBIDs and GIS mapping) to the complex (such as bacteria source tracking). Department staff will provide technical assistance, guidance, and oversight of local efforts to identify and minimize fecal coliform sources of pollution. Based on work in the Lower St Johns River Tributaries and Hillsborough Basins, the Department and local stakeholders have developed a logical process and tools to serve as a foundation for this detective work.

In the near future, the Department will be releasing these tools to assist local stakeholders with the development of local implementation plans to address fecal coliform impairments. In such cases, the Department will rely on these local initiatives as a more cost-effective and simplified approach to identify the actions needed to put in place a road map for restoration activities, while still meeting the requirements of Subsection 403.067(7), F.S.

## References

- Alderiso, K., D. Wait, and M. Sobsey. 1996. Detection and characterization of make-specific RNA coliphages in a New York City reservoir to distinguish between human and nonhuman sources of contamination. In: J.J. McDonnell *et al.* (Eds.), *Proceedings of a symposium on New York City water supply studies* (Herndon, VA: American Water Resources Association, TPS-96-2).
- Association of Metropolitan Sewerage Agencies. 1994. *Separate sanitary sewer overflows:* What do we currently know? Washington, DC.
- CLimate Information for Management and Operational Decisions (CLIMOD). 2012. Available: <a href="http://climod.meas.ncsu.edu/">http://climod.meas.ncsu.edu/</a>.
- Culver, T.B, Y. Jia, R. TiKoo, J. Simsic, and R. Garwood. 2002. *Development of the Total Maximum Daily Load (TMDL) for fecal coliform bacteria in Moore's Creek, Albemarle County, Virginia*. Virginia Department of Environmental Quality.
- Florida Administrative Code. Rule 62-302, Surface water quality standards.
- ——. Rule 62-303, Identification of impaired surface waters.
- Florida Department of Environmental Protection. February 2001. *A report to the Governor and the Legislature on the allocation of Total Maximum Daily Loads in Florida.* Tallahassee, FL: Bureau of Watershed Management.
- ——. 2002. Basin status report: Lake Worth Lagoon–Palm Beach Coast. Tallahassee, FL: Division of Water Resource Management.
- ——. 2008. GIS Layer. Environmental Geology Rock and Sediment Distribution of Florida. Tallahassee, FL. Division of Environmental Assessment and Restoration.
- ——. 2010. GIS Layer. Elevation Contours and Depressions of Florida. Tallahassee, FL. Division of Environmental Assessment and Restoration.
- Florida Department of Health website. *OSTDS statistics*. 2008. Available: http://www.doh.state.fl.us/environment/OSTDS/statistics/ostdsstatistics.htm.
- Florida Watershed Restoration Act. Chapter 99-223, Laws of Florida.
- Hansen, D.L., J.J. Clark, and R.E. Hicks. 2008. Sources and sinks of *Escherichia coli* in benthic and pelagic fish. *J. Great Lakes Res* 34:228–234.
- Hubbard, R.K., G.L. Newton, and G.M. Hill. 2004. Water quality and the grazing animal. *Journal of Animal Science* (82): E255–263.
- Hunter, P.R. 2002. Does calculation of the 95<sup>th</sup> percentile of microbiological results offer any advantage over percentage exceedance in determining compliance with bathing water quality standards? *Applied Microbiology* (34): 283-286.

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- Jamieson, R.C., D.M. Joy, H. Lee, R. Kostaschuk, and R.J. Gordon. 2005. Resuspension of sediment-associated Escherichia coli in a natural stream. *Journal of Environmental Quality* (34): 581–589.
- Landry, M.S., and M.L. Wolfe. 1999. Fecal bacteria contamination of surface waters associated with land application of animal waste. Paper No. 99-4024. Toronto, Ont.: American Society of Agricultural Engineers.
- Lim, S., and V. Olivieri. 1982. *Sources of microorganisms in urban runoff.* Johns Hopkins School of Public Health and Hygiene. Baltimore, MD: Jones Falls Urban Runoff Project.
- Minnesota Pollution Control Agency. 1999. *Effect of septic systems on ground water quality.* Ground Water and Assessment Program. Baxter, MN.
- PBS&J. 2008. Technical fecal BMAP implementation: Identification of probable sources in the Hopkins Creek watershed (WBID 2266). Contract No. WM913, Task Assignment No.4. Prepared for the Florida Department of Environmental Protection.
- Southeast Regional Climate Center(SERCC). 2010. CLimate Information for Management and Operational Decisions (CLIMOD) system for southeastern United States. Available: <a href="http://www.sercc.net/climateinfo/historical/historical.html">http://www.sercc.net/climateinfo/historical/historical.html</a>.
- South Florida Water Management District (SFWMD). 2010. Canals in south Florida: A Technical support document. West Palm Beach, FL.
- Trial, W., et al. 1993. Bacterial source tracking: studies in an urban Seattle watershed. *Puget Sound Notes 30: 1-3.*
- U.S. Department of Agriculture. 2007. National Agricultural Statistics Service: 2007 census of agriculture. Available: <a href="http://www.agcensus.usda.gov/Publications/2007/Full\_Report/index.asp">http://www.agcensus.usda.gov/Publications/2007/Full\_Report/index.asp</a>.
- U.S. Environmental Protection Agency. January 2001. *Protocol for developing pathogen TMDLs.* EPA 841-R-00-002. Washington, DC: Office of Water.
- U. S. Geological Survey. 2010a. *What is ground water?* Available: <a href="http://pubs.usgs.gov/of/1993/ofr93-643/">http://pubs.usgs.gov/of/1993/ofr93-643/</a>.
- ——. 2010b. *Karst and the USGS: What is karst?* Available: <a href="http://water.usgs.gov/ogw/karst/index">http://water.usgs.gov/ogw/karst/index</a>.
- van der Wel, B. 1995. Dog pollution. *The Magazine of the Hydrological Society of South Australia* 2(1) 1.
- Watson, T. June 6, 2002. Dog waste poses threat to water. USA Today.
- Weiskel, P.K., B.L. Howes, and G.R. Heufflder. 1996. Coliform contamination of a coastal embayment: Sources and transport pathway. *Environmental Science and Technology* 1872–1881.

# **Appendices**

## **Appendix A: Background Information on Federal and State Stormwater Programs**

In 1982, Florida became the first state in the country to implement statewide regulations to address the issue of nonpoint source pollution by requiring new development and redevelopment to treat stormwater before it is discharged. The Stormwater Rule, as authorized in Chapter 403, F.S., was established as a technology-based program that relies on the implementation of BMPs that are designed to achieve a specific level of treatment (i.e., performance standards) as set forth in Rule 62-40, F.A.C. In 1994, the Department's stormwater treatment requirements were integrated with the stormwater flood control requirements of the water management districts, along with wetland protection requirements, into the Environmental Resource Permit regulations.

Rule 62-40 also requires the state's water management districts to establish stormwater pollutant load reduction goals (PLRGs) and adopt them as part of a Surface Water Improvement and Management (SWIM) plan, other watershed plan, or rule. Stormwater PLRGs are a major component of the load allocation part of a TMDL. To date, stormwater PLRGs have been established for Tampa Bay, Lake Thonotosassa, the Winter Haven Chain of Lakes, the Everglades, Lake Okeechobee, and Lake Apopka.

In 1987, the U.S. Congress established Section 402(p) as part of the federal Clean Water Act Reauthorization. This section of the law amended the scope of the federal NPDES permitting program to designate certain stormwater discharges as "point sources" of pollution. The EPA promulgated regulations and began implementing the Phase I NPDES stormwater program in 1990. These stormwater discharges include certain discharges that are associated with industrial activities designated by specific standard industrial classification (SIC) codes, construction sites disturbing 5 or more acres of land, and master drainage systems of local governments with a population above 100,000, which are better known as MS4s. However, because the master drainage systems of most local governments in Florida are interconnected, the EPA implemented Phase I of the MS4 permitting program on a countywide basis, which brought in all cities (incorporated areas), Chapter 298 urban water control districts, and the FDOT throughout the 15 counties meeting the population criteria. The Department received authorization to implement the NPDES Stormwater Program in 2000.

An important difference between the federal NPDES and the state's Stormwater/Rnvironmental Resource Permit Programs is that the NPDES Program covers both new and existing discharges, while the state's program focus on new discharges only. Additionally, Phase II of the NPDES Program, implemented in 2003, expands the need for these permits to construction sites between 1 and 5 acres, and to local governments with as few as 1,000 people. While these urban stormwater discharges are now technically referred to as "point sources" for the purpose of regulation, they are still diffuse sources of pollution that cannot be easily collected and treated by a central treatment facility, as are other point sources of pollution such as domestic and industrial wastewater discharges. It should be noted that all MS4 permits issued in Florida include a reopener clause that allows permit revisions to implement TMDLs when the implementation plan is formally adopted.

## **Appendix B: Estimates of Fecal Coliform Loadings from Potential Sources**

The Department provides these estimations for informational purposes only and did not use these estimates to calculate the TMDL. They are intended to give the public a general idea of the relative importance of each source in the waterbody. The estimates were based on the best information available to the Department at the time the calculation was made. The numbers provided do not represent actual loadings from the sources.

#### Pets

Pets (especially dogs) could be a significant source of coliform pollution through surface runoff within the West Palm Beach Canal WBID boundary. Studies report that up to 95% of the fecal coliform found in urban stormwater can have nonhuman origins (Alderiso *et al.* 1996; Trial *et al.* 1993).

The most important nonhuman fecal coliform contributors appear to be dogs and cats. In a highly urbanized Baltimore catchment, Lim and Olivieri (1982) found that dog feces were the single greatest source of fecal coliform and fecal strep bacteria. Trial *et al.* (1993) also reported that cats and dogs were the primary source of fecal coliform in urban subwatersheds. Using bacteria source tracking techniques, it was found in Stevenson Creek in Clearwater, Florida, that the amount of fecal coliform bacteria contributed by dogs was as important as that from septic tanks (Watson 2002).

According to the American Pet Products Manufacturers Association (APPMA), about 4 out of 10 U.S. households include at least 1 dog. A single gram of dog feces contains about 2,200,000 counts/gram of fecal coliform bacteria (van der Wel 1995). Unfortunately, statistics show that about 40% of American dog owners do not pick up their dogs' feces. The number of dogs within the West Palm Beach Canal WBID boundary is not known. Therefore, the statistics produced by APPMA were used in this analysis to estimate the possible fecal coliform loads contributed by dogs.

Using data obtained from the Florida Department of Health (FDOH) to calculate the number of properties in residential land use areas within the West Palm Beach Canal WBID boundary, the number of households within the WBID boundary was estimated to be 489. The data provided by FDOH are described in the next section. Assuming that 40% of the households in this area have 1 dog, the total number of dogs within the WBID is about 195.

**Table B.1** shows the waste production rate for a dog (450 grams/animal/day) and the fecal coliform counts per gram of dog waste (2,200,000 counts/gram). Assuming that 40% of dog owners do not pick up their dogs' feces, the total waste produced by dogs and left on the land surface in residential areas is approximately  $3.52 \times 10^4$  grams/day. The total produced by dogs is  $7.75 \times 10^{10}$  counts/day of fecal coliform.

It should be noted that this load only represents the fecal coliform load created in the WBID and is not intended to be used to represent a part of the existing load that reaches the receiving waterbody. The fecal coliform load that eventually reaches the receiving waterbody could be significantly less than this value due to attenuation in overland transport.

Table B.1. Dog Population Density, Wasteload, and Fecal Coliform Density (Weiskel *et al.* 1996)

\* Number from APPMA

Туре	Population Density (animal/household)	Wasteload (grams/animal-day)	Fecal Coliform Density (counts/gram)		
Dog	0.4*	450	2,200,000		

## Sanitary Sewer Overflows

SSOs can also be a potential source of fecal bacteria pollution. Human sewage can be introduced into surface waters even when storm and sanitary sewers are separated. Leaks and overflows are common in many older sanitary sewers where capacity is exceeded, high rates of infiltration and inflow occur (i.e., outside water gets into pipes, reducing capacity), frequent blockages occur, or sewers are simply falling apart due to poor joints or pipe materials. Power failures at pumping stations are also a common cause of SSOs. The greatest risk of an SSO occurs during storm events; however, few comprehensive data are available to quantify SSO frequency and bacteria loads in most watersheds. Within the WBID boundary, 1 industrial property is known to be served by a sewer system. It is owned and operated by US Sugar Corporation – Bryant Village (21FLA013704). Although this facility does not discharge directly to surface water, it could be a potential source of fecal bacteria pollution.

The number of properties connected to the sewer system within the West Palm Beach Canal WBID boundary was based on data obtained from FDOH's ongoing inventory of wastewater treatment and disposal methods for developed properties. For septic tanks, if there was not enough information to determine with certainty whether a property was sewered, the probability of whether the property was served by a septic tank was determined. If that probability was low (less than 50%), the property was estimated to be served by a sewer system. Within the WBID boundary, 1 industrial property is known to be served by sewer systems.

Fecal coliform loading from sewer line leakage can be calculated based on the number of people in the watershed, typical per household generation rates, and typical fecal coliform concentrations in domestic sewage, assuming a leakage rate of 0.5% (Culver *et al.* 2002). Based on this assumption, a rough estimate of fecal coliform loads from leaks and SSOs within the West Palm Beach Canal WBID boundary can be made using **Equation B.1**.

L = 37.85\* N \* Q \* C \* F

**Equation B.1** 

Where:

L is the fecal coliform daily load (counts/day);

N is the number of households using sanitary sewer in the WBID;

Q is the discharge rate for each household (gallons/day);

C is the fecal coliform concentration for domestic wastewater (counts/100 mL);

F is the sewer line leakage rate; and

37.85 is a conversion factor (100 mL/gallon).

The number of parcels (N) within the WBID boundary that are served by sewer systems is 1. The discharge rate through sewers from each household (Q) was calculated by multiplying the average household size (2.45) by the per capita wastewater production rate per day (70 gallons/day/person). The commonly cited concentration (C) for domestic wastewater is  $1 \times 10^6$  counts/100 mL for fecal coliform (EPA 2001). The contribution of fecal coliform through sewer line leakage was assumed to be 0.5% of the total sewage loading created from the population not on septic tanks (Culver *et al.* 2002). Based on **Equation B.1**, the estimated fecal coliform loading from sewer line leakage in the WBID is approximately  $3.25 \times 10^7$  counts/day.

## Septic Tanks

Septic tanks are another potentially important source of coliform pollution in urban watersheds. When properly installed, most of the coliform from septic tanks should be removed within 50 meters of the drainage field (Minnesota Pollution Control Agency 1999). However, the physical properties of an aquifer, such as thickness, sediment type (sand, silt, and clay), and location play a large part in determining whether contaminants from the land surface will reach ground water (USGS 2010b). The risk of contamination is greater for unconfined (water table) aquifers than for confined aquifers because they usually are nearer to the land surface and lack an overlying confining layer to impede the movement of contaminants (USGS 2010b).

Sediment type (sand, silt, and clay) also determines the risk of contamination in a particular watershed. According to the USGS (2010), "Porosity, which is the proportion of a volume of rock or soil that consists of open spaces, tells us how much water rock or soil can retain. Permeability is a measure of how easily water can travel through porous soil or bedrock. Soil and loose sediments, such as sand and gravel, are porous and permeable. They can hold a lot of water, and it flows easily through them. Although clay and shale are porous and can hold a lot of water, the pores in these fine-grained materials are so small that water flows very slowly through them. Clay has a low permeability."

Also, the risk of contamination is increased for areas with a relatively high ground water table. The drain field can be flooded during the rainy season, resulting in ponding, and coliform bacteria can pollute the surface water through stormwater runoff. Additionally, in these circumstances, a high water table can result in coliform bacteria pollution reaching the receiving waters through baseflow.

In addition, watersheds located in karst regions are extremely vulnerable to contamination. Karst terrain is characterized by springs, caves, sinkholes, and a unique hydrogeology that results in aquifers that are highly productive (USGS 2010b). Compared with nonkarst areas, these features act as direct pathways for pollutants to enter waterbodies.

Septic tanks may also cause coliform pollution when they are built too close to irrigation wells. Any well that is installed in the surficial aquifer system will cause a drawdown. If the septic tank system is built too close to the well (e.g., less than 75 feet), the septic tank discharge will be within the cone of influence of the well. As a result, septic tank effluent may enter the well, and once the polluted water is used to irrigate lawns, coliform bacteria may reach the land surface and wash into surface waters through stormwater runoff.

A rough estimate of fecal coliform loads from failed septic tanks within the West Palm Beach Canal WBID boundary can be made using **Equation B.2**:

L = 37.85\* N \* Q \* C \* F

**Equation B.2** 

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### Where:

L is the fecal coliform daily load (counts/day);

N is the number of households using septic tanks in the WBID;

Q is the discharge rate for each septic tank (gallons/day);

C is the fecal coliform concentration for the septic tank discharge (counts/100mL);

F is the septic tank failure rate; and

37.85 is a conversion factor (100 mL/gallon).

Based on data provided by FDOH, which is currently undertaking a project to inventory the use of onsite treatment and disposal systems (i.e., septic tanks) by determining the methods of wastewater disposal for developed property sites within Palm Beach County, 488 housing units (*N*) within the West Palm Beach Canal WBID boundary are known or believed to be using septic tanks to treat their domestic wastewater (**Figure B.1**).

The discharge rate from each septic tank (*Q*) was calculated by multiplying the average household size by the per capita wastewater production rate. An estimate of fecal coliform loads from failed septic tanks was generated using Palm Beach County information. Based on the information published by the Census Bureau, the average household size for Palm Beach County is about 2.45 people/household. The same population densities were assumed within the West Palm Beach Canal WBID boundary. A commonly cited value for per capita wastewater production rate is 70 gallons/day/person (EPA 2001). The commonly cited concentration (*C*) for septic tank discharge is 1x10<sup>6</sup> counts/100mL for fecal coliform (EPA 2001).

No measured septic tank failure rate data were available for the WBID when this TMDL was developed. Therefore, the failure rate was derived from the number of septic tanks in Palm Beach County based on FDOH's septic tank inventory and the number of septic tank repair permits issued in Palm Beach County as published by FDOH (available: (<a href="http://www.doh.state.fl.us/environment/OSTDS/statistics/ostdsstatistics.htm">http://www.doh.state.fl.us/environment/OSTDS/statistics/ostdsstatistics.htm</a>). The cumulative number of septic tanks in Palm Beach County on an annual basis was calculated by subtracting the number of issued septic tank installation permits for each year from the current number of septic tanks in the county based on FDOH's 20010–11 inventory, and assuming that none of the installed septic tanks will be removed after being installed (Table B.2). The reported number of septic tank repair permits was also obtained from the FDOH website. Based on this information, the annual discovery rates of failed septic tanks were calculated and listed in Table B.2.

Based on **Table B.2**, the average annual septic tank failure discovery rate is about 0.54% for Palm Beach County. Assuming that failed septic tanks are not discovered for about 5 years, the estimated annual septic tank failure rate is about 5 times the discovery rate, or 2.70%. Based on **Equation B.2**, the estimated fecal coliform loading from failed septic tanks within the West Palm Beach Canal WBID boundary is about 8.55 x 10<sup>10</sup> counts/day.

### **Sediments**

Studies have shown that fecal coliform bacteria can survive and reproduce in streambed sediments and can be resuspended in surface water when conditions are right (Jamieson *et al.* 2005). Current methodology cannot quantify the exact amount of fecal coliform coming from each source. Therefore, the Department is unable to provide estimates of fecal coliform loading from sediments.

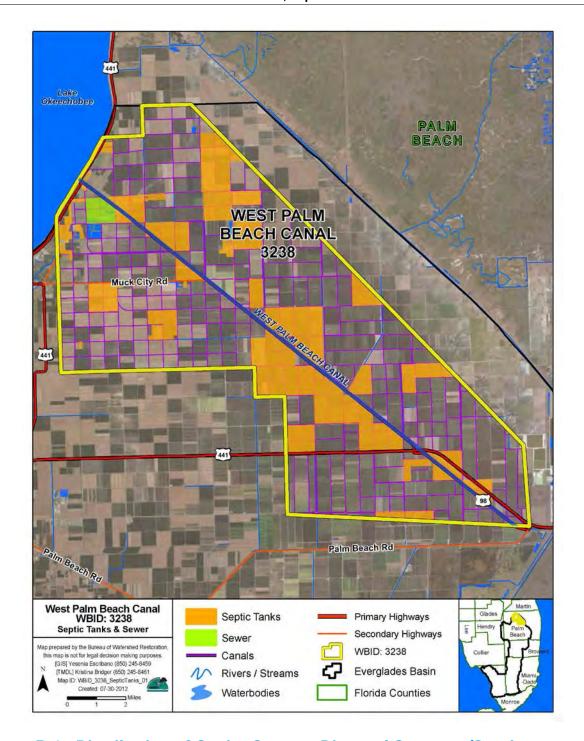


Figure B.1. Distribution of Onsite Sewage Disposal Systems (Septic Tanks) in Residential and Agricultural Land Use Areas within the West Palm Beach Canal (WBID 3238) Watershed Boundary

Table B.2. Estimated Number of Septic Tanks and Septic Tank Failure
Rates for Palm Beach County, 2006–2011

\* The failure rate is 5 times the failure discovery rate.

Palm Beach County	2006	2007	2008	2009	2010	2011	Average
New installations (septic tanks)	691	776	314	245	114	127	378
Accumulated installations (septic tanks)	78179	78870	79646	79960	80205	80319	79529
Repair permits (septic tanks)	407	531	520	402	434	279	429
Failure discovery rate (%)	0.52	0.67	0.65	0.50	0.54	0.35	0.54
Failure rate (%)*	2.60	3.37	3.26	2.51	2.71	1.74	2.70

### Wildlife

Wildlife is another possible source of fecal coliform bacteria within the West Palm Beach Canal WBID boundary. As shown in **Figure 4.1**, wetland areas exist within the West Palm Beach Canal watershed. These likely serve as habitat for wildlife that has the potential to contribute fecal coliform to the canal. Wildlife deposit coliform bacteria with their feces onto land surfaces, where they can be transported during storm events to nearby streams. Some wildlife (such as birds, otters, alligators, and raccoons) deposit their feces directly into the water. Cold-blooded animals, such as fish and iguanas, harbor *E. coli* in their intestines, and it is possible that they may reintroduce *E. coli* bacteria into waterways when they excrete their own waste (Hansen *et al.* 2008). The bacterial load from naturally occurring wildlife is assumed to be background. However, as these represent natural inputs, no reductions are assigned to these sources by this TMDL.

#### Livestock

Agricultural animal waste is associated with various pathogens in streams; these can include *E. coli, Salmonella, Giardia, Campylobacter, Shigella, and Cryptosporidiumparvum* (Landry and Wolfe 1999). High loading rates of pathogens to soils and waters can result from the presence of livestock and other agricultural animals. Livestock with direct access to a receiving water can contribute to exceedances during wet and dry weather conditions.

Problems with grazing animals and pathogen loading rates derive primarily from animal density (Hubbard *et al.* 2004). At low animal densities, livestock with free access to waterbodies can directly deposit urine and manure (Hubbard *et al.* 2004). At high animal densities, large amounts of urine and feces may be deposited in relatively small areas, increasing the probability of nutrients and pathogens being transported to surface waterbodies via surface runoff, or entering ground water (Hubbard *et al.* 2004).

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Agricultural land uses, specifically crop and pastureland, occupy 96.1% of the total land area in the West Palm Beach Canal watershed. High loading rates of fecal coliform to soils and waters can result from livestock and other agricultural animals. Livestock with direct access to receiving water can contribute to the exceedances during wet and dry weather conditions. Livestock data from the 2007 census of agriculture for Palm Beach County are available at <a href="http://www.agcensus.usda.gov/Publications/2007/index.asp">http://www.agcensus.usda.gov/Publications/2007/index.asp</a> (U.S. Department of Agriculture 2007). Since a livestock inventory does not exist for the West Palm Beach Canal watershed, a possible fecal coliform load from livestock could not be calculated.



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