

Response to Public Comment
Eight TMDLs for Indicator Bacteria in Greens Bayou Above Tidal and Tributaries
(Segments 1016, 1016A, 1016B, 1016C, 1016D)

| Tracking Number | Date Received | Affiliation of Commenter | Summary of Request or Comment | Summary of TCEQ Action or Explanation |
|-----------------|---------------|---|---|--|
| 001_01 | 1/21/10 | Tom Ivy, Texas Stream Team (Oral Comment with E-mail that Followed) | <p>The commenter stated that George Bush Intercontinental Airport “receives airplanes from all over the world” and that they “can bring us organisms from all over the world, including cholera”. He expressed concern about basing the wasteload allocation for the facility on its full permitted discharge and using a 5% margin of safety.</p> <p>In a follow-up e-mail, the commenter reiterated his concern with using the full permitted flows when determining the individual wasteload allocations for all permitted facilities, with special emphasis again given to the airport. He states that these facilities typically discharge at levels far below their permitted amounts, and that wasteload allocations based on the permitted amounts could allow them to discharge far more bacteria than they currently discharge.</p> | <p>Standard operations by wastewater treatment facilities are expected to treat wastewater so that it meets established state water quality standards at the point of discharge, regardless of the origin of the waste input. If, in the future, the airport (or any permitted WWTF) is consistently found to violate its permitted bacteria discharge, then the violation would be addressed through the TCEQ’s enforcement process.</p> <p>To be consistent with all other TMDLs developed by the TCEQ and to satisfy EPA requirements, individual load allocations are based on facilities’ full permitted flow discharges. Basing the individual wasteload allocation on a full permitted discharge will not in practice allow facilities a greater discharge of bacteria. Permit limits for bacteria are based on concentration – 63 MPN/100 mL for <i>E. coli</i> in Greens Bayou and other Houston-area watersheds. A facility’s bacteria discharge will be limited by its actual discharge, not its full permitted flow.</p> <p>While some bacteria TMDLs in Texas have an implicit margin of safety, this TMDL has a 5% explicit margin of safety. This provides a more protective water quality goal for the affected water bodies.</p> <p>No changes have been made to the TMDL document based on this comment.</p> |