

March 10, 2004

Ms. Ellen Caldwell (6WQ)
Water Quality Protection Division
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Comments on TMDL for Bayou Segnette for Fecal Coliform
Federal Register Notice February 9, 2004
Volume 69, No. 26

Dear Ms. Caldwell:

The Louisiana Department of Environmental Quality (LDEQ) has reviewed the TMDL for Bayou Segnette for fecal coliform noticed in the February 9, 2004 Federal Register (Volume 69, Number 26). This TMDL was prepared by a contractor for Region 6 EPA. LDEQ's comments are presented below.

In general, LDEQ does not believe that the TMDL concept was intended to address fecal coliform bacteria. Bacteria are living organisms and are not suited to mathematical computations to estimate loading. In the aquatic environment, bacteria reproduce and die off at rates that vary as in-stream and climatic conditions vary.

This TMDL indicates that a 65% reduction in man-made nonpoint source loads of bacteria is required to meet the water quality standard for primary contact recreation. The calculations show that the largest source (77%) is the water that is pumped into Bayou Segnette from the Westwego urban area. This is largely urban runoff but includes the wastewater discharge from the City of Westwego. The report states that the urban runoff load would be treated as part of the wasteload allocation because there is a MS4 permit in effect for Jefferson Parish. It goes on to state that no reductions in point source loading would be required because the LPDES permits for sanitary wastewater require that the standard be met at end of pipe. This is not required for the MS4 permits. The report should clarify this point. Any reductions in the loading from urban runoff would have to come through implementation of management practices within the urban area upstream of Bayou Segnette.

Ms. Ellen Caldwell
March 10, 2004
Page 2

Beginning in January, LDEQ revised its ambient water quality monitoring cycle to a four-year cycle. LDEQ requests that the EPA TMDL reports be revised to reflect this. A description of the revised monitoring approach is attached for EPA use.

If the EPA would like to confer with LDEQ regarding this TMDL, arrangements can be made through Ms. Emelise Cormier or Ms. Barbara Romanowsky.

Sincerely,

Karen Gautreaux, Deputy Secretary
Louisiana Department of Environmental Quality

Cc: Jane Watson, Region 6 EPA
Golam Mustafa, Region 6 EPA
Barbara Romanowsky, LDEQ/EED
Emelise Cormier, LDEQ/ETD