

**Michigan Department of Environmental Quality
Water Bureau
February 2008**

**Total Maximum Daily Load for *E. coli* for the
South Branch River Raisin
Lenawee County**

INTRODUCTION

Section 303(d) of the federal Clean Water Act and the United States Environmental Protection Agency's (USEPA's) Water Quality Planning and Management Regulations (Title 40 of the Code of Federal Regulations, Part 130) require states to develop Total Maximum Daily Loads (TMDLs) for water bodies that are not meeting water quality standards (WQS). The TMDL process establishes the allowable loadings of pollutants for a water body based on the relationship between pollution sources and in-stream water quality conditions. TMDLs provide states a basis for determining the pollutant reductions necessary from both point and nonpoint sources to restore and maintain the quality of their water resources. The purpose of this TMDL is to identify the allowable levels of *E. coli* that will result in the attainment of the applicable WQS in the South Branch River Raisin, located in Lenawee County, Michigan.

PROBLEM STATEMENT

This TMDL addresses the listing that appears on the 2006 Section 303(d) list as:

RIVER RAISIN, S. BR.

WBID#: **061102A**

County: LENAWEЕ

SIZE: 4 M

Location: River Raisin confluence u/s to the vicinity of the Adrian WWTP.

NHD Reach Code: 04100002000151

Problem Summary: CSO, pathogens (Rule 100).

TMDL Year(s): 2008

The TMDL reach is located in the River Raisin watershed, Hydrologic Unit Code 4100002, which drains into Lake Erie (Figure 1). The South Branch River Raisin was placed on the 2006 Section 303(d) list due to impairment of recreational uses as indicated by elevated levels of *E. coli* (Edly and Wuycheck, 2006). Monitoring data collected by the Michigan Department of Environmental Quality (MDEQ) in 2006 documented continuous exceedances of the daily maximum and 30-day geometric mean WQS for *E. coli* during the total body contact recreational season of May 1 through October 31 (Table 1a-1b; Figures 3-4).

NUMERIC TARGET

The impaired designated use addressed by this TMDL is total body contact recreation. The designated use rule (Rule 100 [R 323.1100] of the Part 4 rules, WQS, promulgated under Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended) states that this water body be protected for total body contact recreation from May 1 to October 31. The target levels for this designated use are the ambient *E. coli* standards established in Rule 62 of the WQS as follows:

R 323.1062 Microorganisms.

Rule 62. (1) All waters of the state protected for total body contact recreation shall not contain more than 130 *E. coli* per 100 milliliters (mL), as a 30-day geometric mean. Compliance shall be based on the geometric mean of all individual samples taken during five or more sampling events representatively spread over a 30-day period. Each sampling event shall consist of three or more samples taken at representative locations within a defined sampling area. At no time shall the waters of the state protected for total body contact recreation contain more than a maximum of 300 *E. coli* per 100 mL. Compliance shall be based on the geometric mean of three or more samples taken during the same sampling event at representative locations within a defined sampling area.

The target for sanitary wastewater discharges is:

Rule 62. (3) Discharges containing treated or untreated human sewage shall not contain more than 200 fecal coliform bacteria per 100 mL, based on the geometric mean of all of five or more samples taken over a 30-day period, nor more than 400 fecal coliform bacteria per 100 mL, based on the geometric mean of all of three or more samples taken during any period of discharge not to exceed seven days. Other indicators of adequate disinfection may be utilized where approved by the Department.

Sanitary wastewater discharges are considered in compliance with the WQS of 130 *E. coli* per 100 mL if their National Pollutant Discharge Elimination System (NPDES) permit limit of 200 fecal coliform per 100 mL as a monthly average is met. This is assumed because *E. coli* are a subset of fecal coliform (American Public Health Association, 1995). Fecal coliform concentrations are substantially higher than *E. coli* concentrations when the wastewater of concern is sewage (Whitman, 2001). Therefore, typically it can be assumed that there are less than 130 *E. coli* per 100 mL in the effluent when the point source discharge is meeting its limit of 200 fecal coliform per 100 mL.

For this TMDL, the WQS of 130 *E. coli* per 100 mL as a 30-day geometric mean and 300 *E. coli* per 100 mL as a daily geometric mean are the target levels for the TMDL reach from May 1 to October 31. As previously stated, the 2006 monitoring data indicated many daily maximum and monthly average WQS exceedances at all sampling stations.

DATA DISCUSSION

E. coli data were collected by the MDEQ from eight sites in Lenawee County from May 1-October 31 in 2006 (Figure 2). Six stations were located on the South Branch River Raisin (Stations 1-4, 6, and 8), one on Wolf Creek (Station 5), and one on Beaver Creek (Station 7). Precipitation data for the two days prior to each MDEQ sampling event were obtained from a weather station at Lenawee County Airport near Adrian, Michigan (Tables 1a-1b; Weather Underground, 2007). *E. coli* daily maximum and 30-day geometric mean data for 2006 are shown in Tables 1a and 1b and Figures 3 and 4. The data are summarized in Table 2. The highest daily maximum *E. coli* concentration of 12,078 *E. coli* per 100 mL was recorded at Station 4 on July 31, 2006. There were multiple exceedances of the daily maximum WQS (300 *E. coli* per 100 mL) at every sampling station. The daily maximum WQS was exceeded during 136 of the 176 monitoring events. The 30-day geometric mean WQS was exceeded at all stations on multiple occasions throughout the sampling season. At Stations 1-4 and 6-8, the 30-day geometric mean WQS was exceeded during 100 percent of sampling dates. At Station 5, the 30-day geometric mean WQS was exceeded during 55 percent of sampling dates.

An analysis of variance on log transformed daily data (95 percent confidence) and a Tukey's Pairwise Comparison indicate that the daily *E. coli* results at Station 5 are statistically significantly lower than the remaining sites (P-value=0.000). The data indicate that Wolf Creek contributes to *E. coli* contamination in the South Branch River Raisin to a much lesser extent than the other stations. Among the stations located on the South Branch (1-4, 6, and 8) and Beaver Creek (7), no station was found to be statistically different than the others.

Cryptosporidium has been found during sampling of the South Branch River Raisin. *Cryptosporidium*, like *E. coli*, is a pathogen capable of causing disease in humans, which originate in fecal material associated with warm-blooded animals. In the summer of 2004, the MDEQ collected ambient water samples from seven targeted sites in the South Branch River Raisin watershed to be analyzed for *Cryptosporidium* oocysts (Sunday et al, 2005). *Cryptosporidium* oocysts ('egg-like' protective cases) were detected at Stony Creek (Dover Township, see Figure 1) in two locations, but none of the oocysts were determined to be capable of causing human disease (non-infective). Adrian Water Treatment Plant (MIG640224) intake water from Wolf Creek (see Figure 1) was also analyzed and found to contain non-infective *Cryptosporidium* oocysts. Any controls implemented to reduce *E. coli* sources and meet the goals of this TMDL should also reduce the incidence of *Cryptosporidium* in surface waters.

SOURCE ASSESSMENT

Possible sources of *E. coli* include manure spreading, pastureland runoff, livestock with stream access, combined sewer overflows (CSOs), sanitary sewer overflows (SSOs), failing septic systems, illicit connections to storm sewers and drains, and wildlife and/or pet waste.

To assist in determining potential sources of *E. coli* to the South Branch River Raisin, a load duration curve analysis was developed for each sampling station as outlined by Cleland (2002). A load duration curve considers how flow conditions relate to a variety of pollutant sources (point and nonpoint sources). The load duration curves for each station sampled on the South Branch River Raisin, Wolf Creek, and Beaver Creek are included in Figures 5-12. The South Branch River Raisin does not have a continuous stream flow record; therefore, the flows of a gauged stream with similar geological characteristics were used to develop load duration curves. The United States Geological Survey gauge used to determine the load duration curves is located on the River Raisin near Manchester, Michigan (Gauge #04176000). Three years of data from the gauge on the South Branch River Raisin in Adrian (Gauge #04175957) were also used. A ratio of the drainage area of the South Branch River Raisin, Wolf Creek, and Beaver Creek to the drainage area of the gauged watersheds (defined as the drainage area ratio), was calculated for each of the eight sample locations for this TMDL. The curves were generated by applying these drainage area ratios to gauged flows for the period of record.

The load duration curves indicate that exceedances of the daily maximum WQS are observed during wet and dry weather events (Table 1a-1b; Figures 5-12). Note that data points above the curve on the left side of the figure are indicative of *E. coli* WQS exceedances during wet weather conditions (higher flows) and data points above the curve to the right side of the figure indicate *E. coli* WQS exceedances during dry weather conditions (lower flows). These dry weather exceedances indicate that sources of *E. coli* are most likely not related to precipitation events (i.e., runoff). The most likely source of *E. coli* during dry weather is a constant source, such as failing septic systems and illicit connections of sewage sources to surface water bodies throughout the watershed.

Moderate correlations exist between the *E. coli* concentrations and two-day prior precipitation amounts at Station 1 ($R^2=0.41$), Station 2 ($R^2=0.42$), and Station 6 ($R^2=0.49$) (Table 2). Virtually

none of the daily maximum *E. coli* results could be explained by precipitation at Station 5 (Wolf Creek; $R^2= 0.00$) and Station 7 (Beaver Creek, $R^2=0.08$). It is likely that the impoundment less than a mile upstream of Station 5 may have buffered the effects of rainfall at that site. Of the stations on the South Branch River Raisin (1-4, 6, and 8), between 51 and 80 percent of the variation in the daily maximum data cannot be explained directly by precipitation during the two days preceding sampling. This supports the conclusion that dry weather sources are a significant portion of the WQS compliance problem in the TMDL reach.

There are 36 NPDES permitted discharges in the TMDL watershed, including 5 individual permits, and 31 Certificates of Coverage (COCs) under 5 general permits (Table 2). Within the watershed there are also 21 Notices of coverage (NOCs) under 1 permit-by-rule. Locations of permitted discharges in the TMDL watershed are shown in Figure 1. One of the individual permits, Hartland Farms, is a Concentrated Animal Feeding Operation (CAFO). Hartland Farms operates a CAFO consisting of dairy cows and spreads liquid and solid manure, as well as composted mortalities, over as many as 1,745 acres of land in the vicinity of the town of Clayton (Figure 1). As required by the facility's NPDES permit, Hartland Farms has submitted a nutrient management plan, which defines manure storage and field application practices.

The South Branch River Raisin watershed has one permitted CSO (the Winter Street Retention Treatment Basin (RTB) tributary to the Adrian Wastewater Treatment Plant (WWTP)). The city of Adrian has implemented a long-term CSO control plan for reduction of inflow and infiltration to the sanitary collection system. Sewage released from the Winter Street RTB CSO receives settling and disinfection prior to discharge. The most recent CSO events for the city of Adrian were on May 10, 2003, at a CSO outfall that is currently closed as part of the long-term control plan, and on September 20, 2002, at the Winter Street RTB. Neither of the sampling sites (Stations 4 and 8) that are downstream of the city of Adrian WWTP outfalls had significantly higher *E. coli* concentrations than the other sites. However, no CSO or SSO events occurred within the period of two days prior to the sampling events. Two SSO events in the city of Adrian were reported to the MDEQ during the summer of 2006, occurring on June 21 and July 14, following heavy rains (MDEQ, 2006). Other discharges of treated sanitary wastewater within the South Branch River Raisin watershed include the Clayton Wastewater Sewage Lagoon (WWSL), Onsted WWTP, and Lenawee County Drain Commissioner (CDC)-Loch Erin WWTP.

Farm manure spreading, aside from permitted CAFOs, is likely a major nonpoint source of *E. coli* to the South Branch River Raisin. National Oceanic and Atmospheric Administration Land cover data (2001) shows that the watershed is dominated by cultivated (row) crops (42 percent). Additional land coverage includes pasture/hay (23 percent), deciduous forest (12 percent), and light to high intensity developed land (10 percent). The Wolf Creek portion of the watershed drains 46,830 acres, of which 19,000 acres is cultivated land (40 percent of the watershed). The Beaver Creek watershed is smaller, covering 14,441 acres, with 6,000 acres under cultivation (42 percent of the watershed).

On-site septic systems serve many homes in the south branch River Raisin watershed. In Lenawee County, it is estimated that there are between 15-30 septic systems per square mile (*E. coli* Work Group, draft). When they are not functioning properly, or are poorly designed, they can be another potential source of *E. coli* contamination. The Lenawee County Health Department does not maintain point-of-sale septic inspection records. Thus, we have no indication of the on-site septic system failure rate for the South Branch River Raisin. In general the on-site septic system failure rate across Michigan reportedly averages between 5-10 percent (*E. coli* Work Group, draft).

LOADING CAPACITY (LC) DEVELOPMENT

The LC represents the maximum loading that can be assimilated by the water body while still achieving WQS. As indicated in the Numeric Target section, the targets for this pathogen TMDL are the 30-day geometric mean WQS of 130 *E. coli* per 100 mL and daily maximum of 300 *E. coli* per 100 mL. Concurrent with the selection of a numeric concentration endpoint, development of the LC requires identification of the critical condition. The “critical condition” is defined as the set of environmental conditions (e.g., flow) used in development of the TMDL that results in attaining WQS and has an acceptably low frequency of occurrence.

For most pollutants, TMDLs are expressed on a mass loading basis (e.g., pounds per day). For *E. coli*, however, mass is not an appropriate measure, and the USEPA allows pathogen TMDLs to be expressed in terms of organism counts (or resulting concentration). Therefore, this pathogen TMDL is concentration based, consistent with R 323.1062, and the TMDL is equal to the target concentration of 130 *E. coli* per 100 mL as a 30-day geometric mean and daily maximum of 300 *E. coli* per 100 mL in all portions of the TMDL reach for each month of the recreational season (May through October). Expressing the TMDL as a concentration equal to the WQS ensures that the WQS will be met under all flow and loading conditions; therefore, a critical condition is not applicable for this TMDL.

LC

The LC is the sum of individual waste load allocations (WLAs) for point sources and load allocations (LAs) for nonpoint sources and natural background levels. In addition, the LC must include a margin of safety (MOS), either implicitly within the WLA or LA, or explicitly, that accounts for uncertainty in the relation between pollutant loads and the quality of the receiving water body. Conceptually, this definition is denoted by the equation:

$$LC = \sum WLAs + \sum LAs + MOS$$

The LC represents the maximum loading that can be assimilated by the receiving water while still achieving WQS. Because this TMDL is concentration based, the total loading for this TMDL is equal to the WQS of 130 *E. coli* per 100 mL as a 30-day geometric mean and 300 *E. coli* per 100 mL as a daily maximum during the recreation season.

WLAs

Table 3, as well as Figure 1, outline the permitted point source discharges to the watershed surrounding the South Branch River Raisin TMDL reach. The discharges include 5 individual permits, 3 noncontact cooling water COCs, 24 industrial storm water COCs, 1 WWSL COC, 2 water supply discharge COCs, and 21 NOCs under 1 permit-by-rule. The WLA for the permits in Table 2 is equal to 130 *E. coli* per 100 mL as a 30-day average and 300 *E. coli* per 100 mL as a daily maximum during the recreational season between May 1 and October 31.

LAs

Because this TMDL is concentration based, the LA is also equal to 130 *E. coli* per 100 mL as a monthly geometric mean and 300 *E. coli* per 100 mL as a daily maximum. This LA is based on the assumption that all land, regardless of use, will be required to meet the WQS. Therefore, the relative responsibility for achieving the necessary reductions of bacteria and maintaining acceptable conditions will be determined by the amount of land under the jurisdiction of the local unit of government in the watershed (Table 4). Eleven municipalities have land area greater than 1 percent within the South Branch River Raisin watershed.

MOS

This section addresses the incorporation of an MOS in the TMDL analysis. The MOS accounts for any uncertainty or lack of knowledge concerning the relationship between pollutant loading and water quality, including the pollutant decay rate, if applicable. The MOS can be either implicit (i.e., incorporated into the WLA or LA through conservative assumptions) or explicit (i.e., expressed in the TMDL as a portion of the loadings). This TMDL uses an implicit MOS because no rate of decay was used. Pathogen organisms ordinarily have a limited capability of surviving outside of their hosts and a rate of decay could be developed. However, applying a rate of decay could result in an allocation that would be greater than the WQS, thus no rate of decay is applied to provide for greater protection of water quality. The MDEQ has determined that the use of the WQS of 130 *E. coli* per 100 mL as a monthly geometric mean and 300 *E. coli* per 100 mL as a daily maximum for the WLA and LA is a more conservative approach than developing an explicit MOS. This accounts for the uncertainty in the relationship between pollutant loading and water quality, based on available data and the assumption to not use a rate of decay. Applying the WQS to be met under all flow conditions also adds to the assurance that an explicit MOS is unnecessary.

SEASONALITY

Seasonality in the TMDL is addressed by expressing the TMDL in terms of a total body contact recreation season that is defined as May 1 through October 31 by R 323.1100 of the WQS. It is expected that there is no total body contact during the remainder of the year due to cold weather. Allocations developed to protect during the total body contact season are also expected to assure attainment of the daily maximum partial body contact standard of 1000 *E. coli* per 100 mL, which applies year-round. Because this is a concentration-based TMDL, WQS must be met regardless of flow conditions in the applicable season.

REASONABLE ASSURANCE ACTIVITIES

Permits for the NPDES permitted facilities contain measures to reduce or eliminate the potential for fecal contamination of the South Branch River Raisin. Michigan regulates discharges containing treated or untreated human waste (i.e., sanitary wastewater) using fecal coliform. Sanitary wastewater discharges are required to meet 200 fecal coliform per 100 mL as a monthly average and 400 fecal coliform per 100 mL as a maximum. The sanitary discharges are expected to be in compliance with the ambient WQS of 130 *E. coli* per 100 mL and 300 *E. coli* per 100 mL if their NPDES permit limits for fecal coliform are met. The *E. coli* criteria contained in the USEPA's criteria document (1986) were derived to approximate the degree of protection, e.g., no more than 8 illnesses per 1000 swimmers, provided by the fecal coliform indicator level of 200 *E. coli* per 100 mL recommended by the USEPA prior to the adoption of the 1986 criteria. All WWTPs provide year-round disinfection, providing another level of confidence that the WQS for *E. coli* will be met. The individual and general permittees listed in Table 3 with treated human waste discharges are responsible for maintaining compliance with their respective NPDES permit limitations for fecal coliform, and shall continue to monitor their effluent according to their permit requirements.

Compliance is determined based on review of discharge monitoring report data submitted by each permittee to the MDEQ. All CSOs from the city of Adrian are disinfected before discharge. Additionally, throughout the full body contact season, the city of Adrian (in cooperation with the Lenawee County Health Department) monitors the South Branch River Raisin in the vicinity of Adrian if a SSO or CSO event occurs that may affect the water quality of the river. Permitted CAFOs, also a potential source of *E. coli* to the South Branch River Raisin, are required to

submit nutrient management plans as part of their NPDES obligations; this document requires a plan for the storage and disposal (land application) of animal waste.

The River Raisin watershed is one of three watersheds in Michigan taking part in the Conservation Reserve Enhancement Program (CREP), and one of six in the Conservation Security Program (CSP). The CREP is an extension of the Conservation Reserve Program (CRP), which offers farmers annual rental payments for taking agricultural lands out of production. The CREP extends the scope of the CRP program and allows the enrollment of land associated with specific conservation practices that improve water quality and wildlife habitat. The CSP financially rewards farmers who have already installed high quality Best Management Practices (BMPs) on all of their production land and continue to maintain them. Beneficial activities associated with these programs include the installation of filter strips, conservation tillage, riparian buffer strips, controlled livestock access, and wetland restoration. Once installed, these practices will aid in the reduction of *E. coli* by limiting cattle access to streams and by filtering overland runoff to the stream. The Lenawee County Farm Service Agency currently administers 1863 CRP contracts, 763 of which are in CREP (Lenawee County Farm Service Agency; personal communication with Constance Reid Guffey).

There have been several demonstration projects under Section 319 for the River Raisin in the past. The River Raisin Initiative, Project #1999-0074, sought to establish the necessary foundations to restore the River Raisin by initiating four program components basin wide, including fostering community action in the watershed, the development of an information and education campaign, development of an Adopt-A-Stream program, and the implementation of BMPs. Beneficial activities from BMPs will likely be the reduced delivery of sediment and associated *E. coli* to the River Raisin. Other practices, such as controlled livestock access and planting riparian vegetation, may also result in a reduction of *E. coli* inputs from nonpoint sources in the watershed.

Under another Section 319 grant (Project #2005-0117), the River Raisin Watershed Council is in the process of developing the River Raisin Watershed Management Plan. The goal of the project is to develop a guidance document to plan for the future of water quality in the watershed. The plan involves the identification of watershed-wide and subwatershed priorities, improvement of public involvement and education, creation of a feasible plan, and improved stakeholder coordination and communication. The completion of the watershed management plan will qualify the watershed for implementation grant funding.

The city of Adrian is currently conducting an Illicit Discharge Elimination Program within the city's storm sewer system (Clean Michigan Initiative Project #2002-0204). This project is still in progress with an expected completion date of December 2008. Elimination of any such discharges will contribute to reductions in *E. coli* levels in the South Branch River Raisin during both dry and wet weather events.

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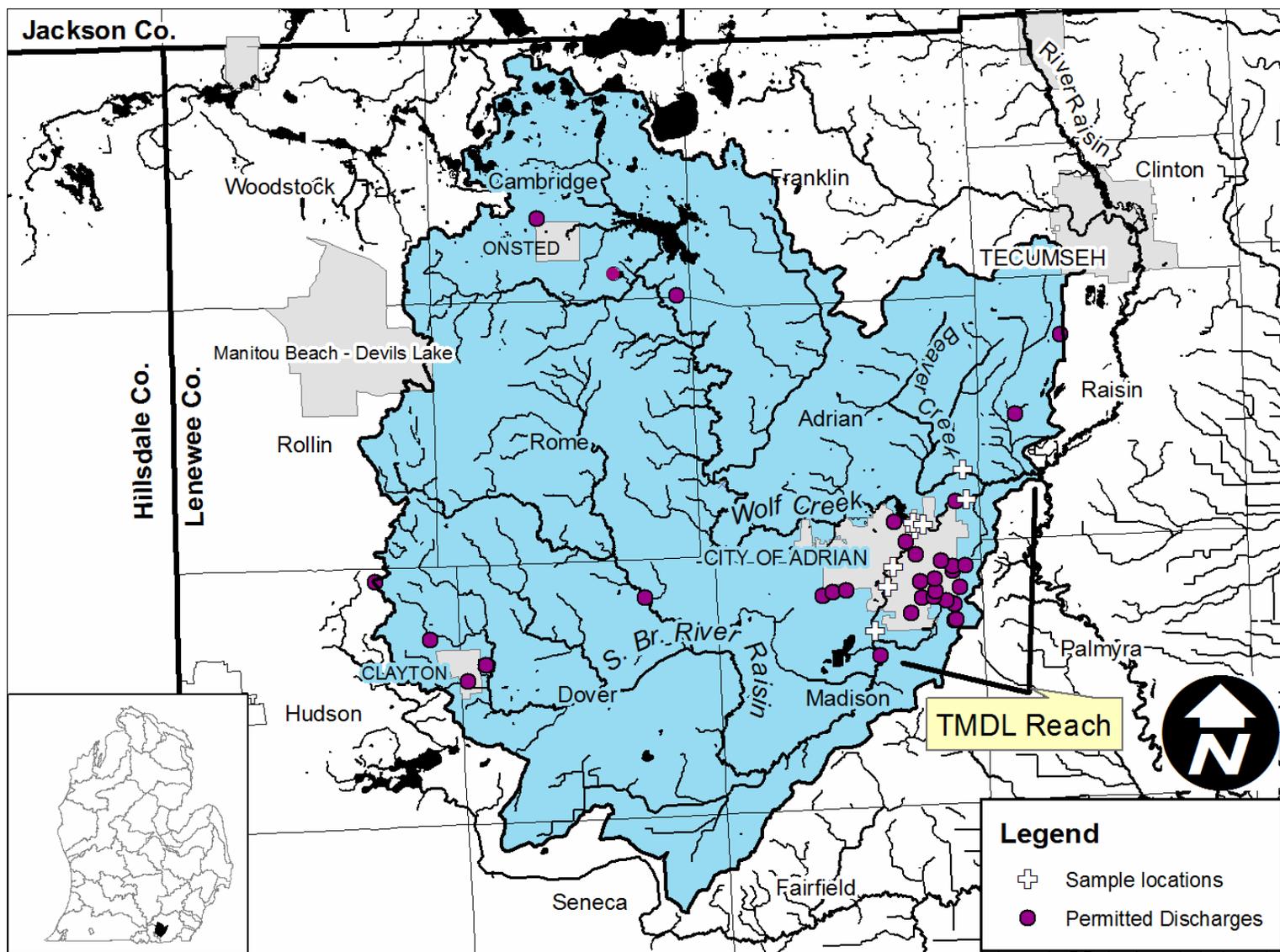


Figure 1. Overview of the South Branch River Raisin watershed showing the location of the TMDL reach, 2006 MDEQ sampling stations, and NPDES permitted facilities (NOCs not shown).

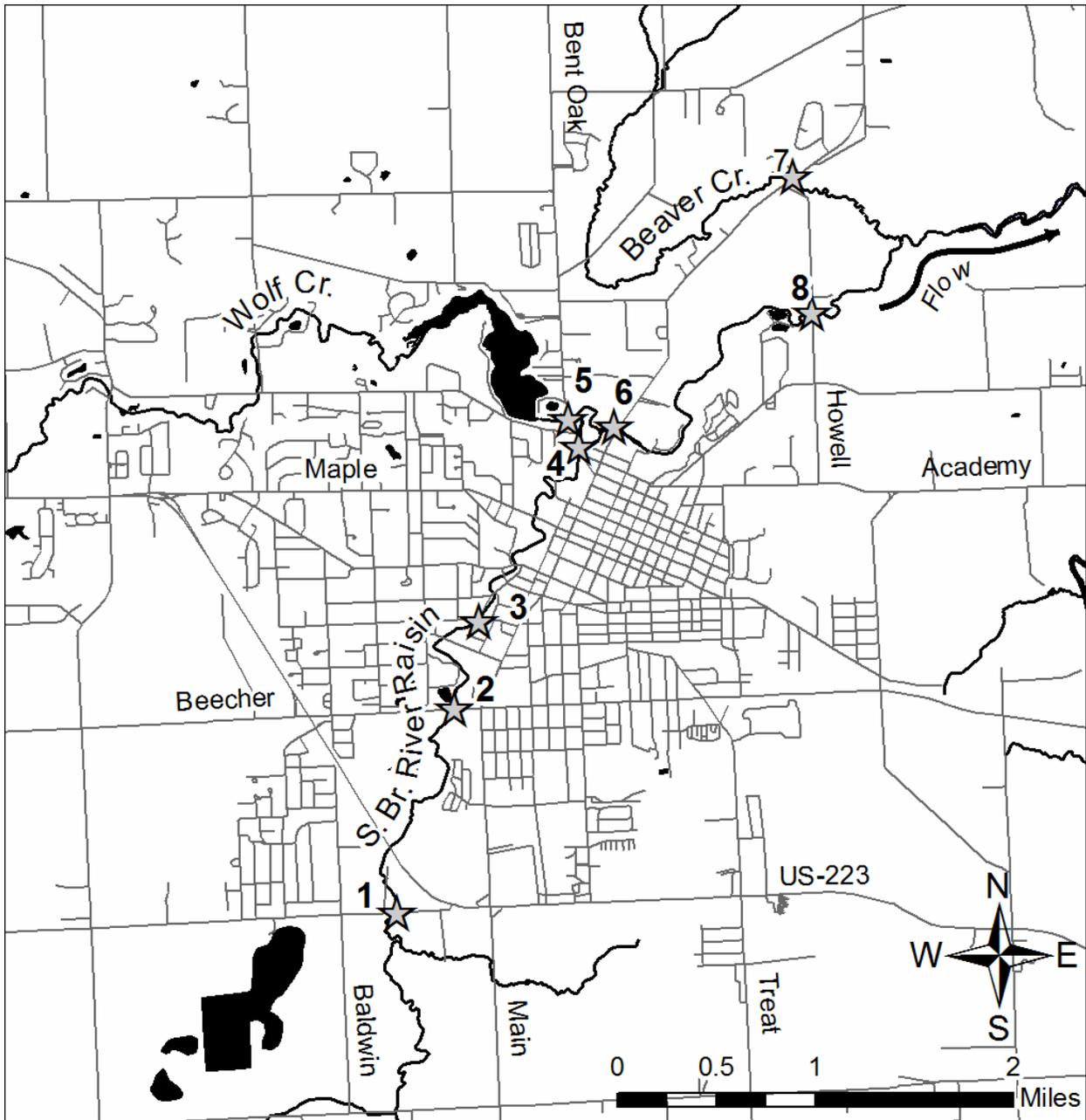


Figure 2. Sampling locations 1-8 located on the South Branch River Raisin, Wolf Creek, and Beaver Creek.

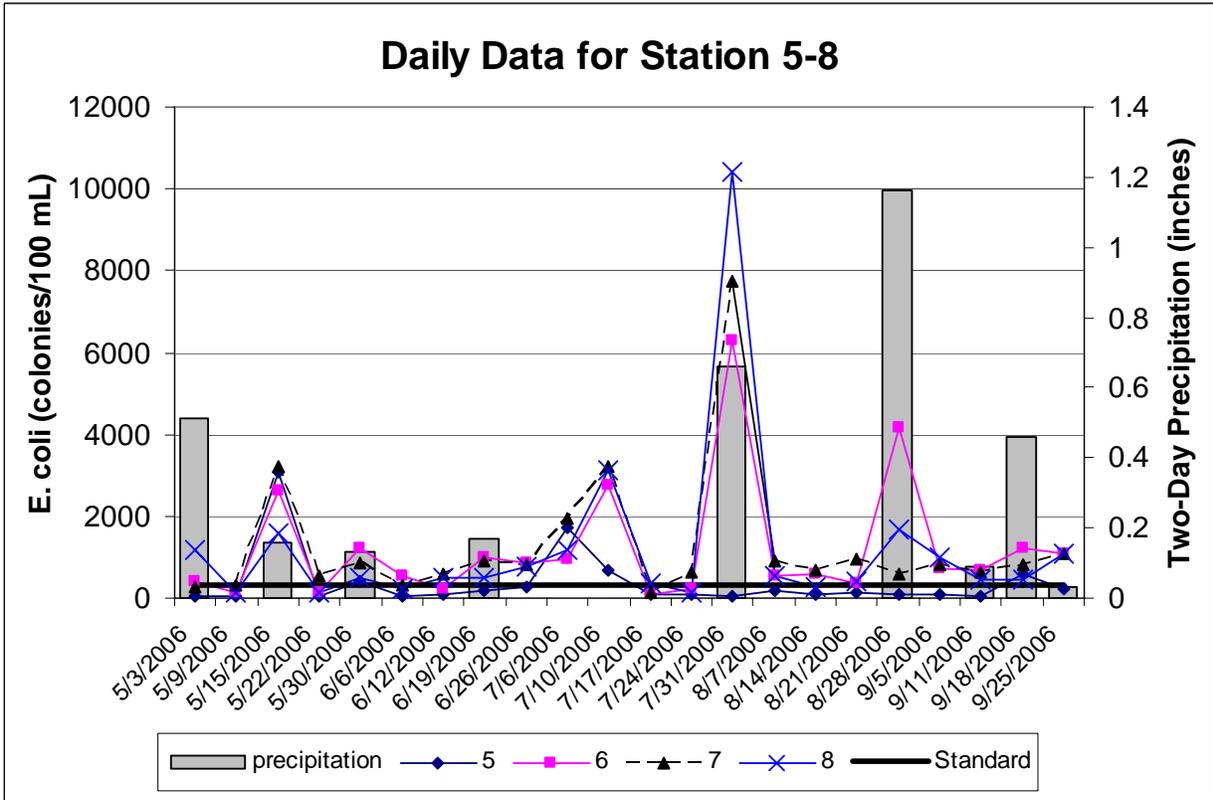
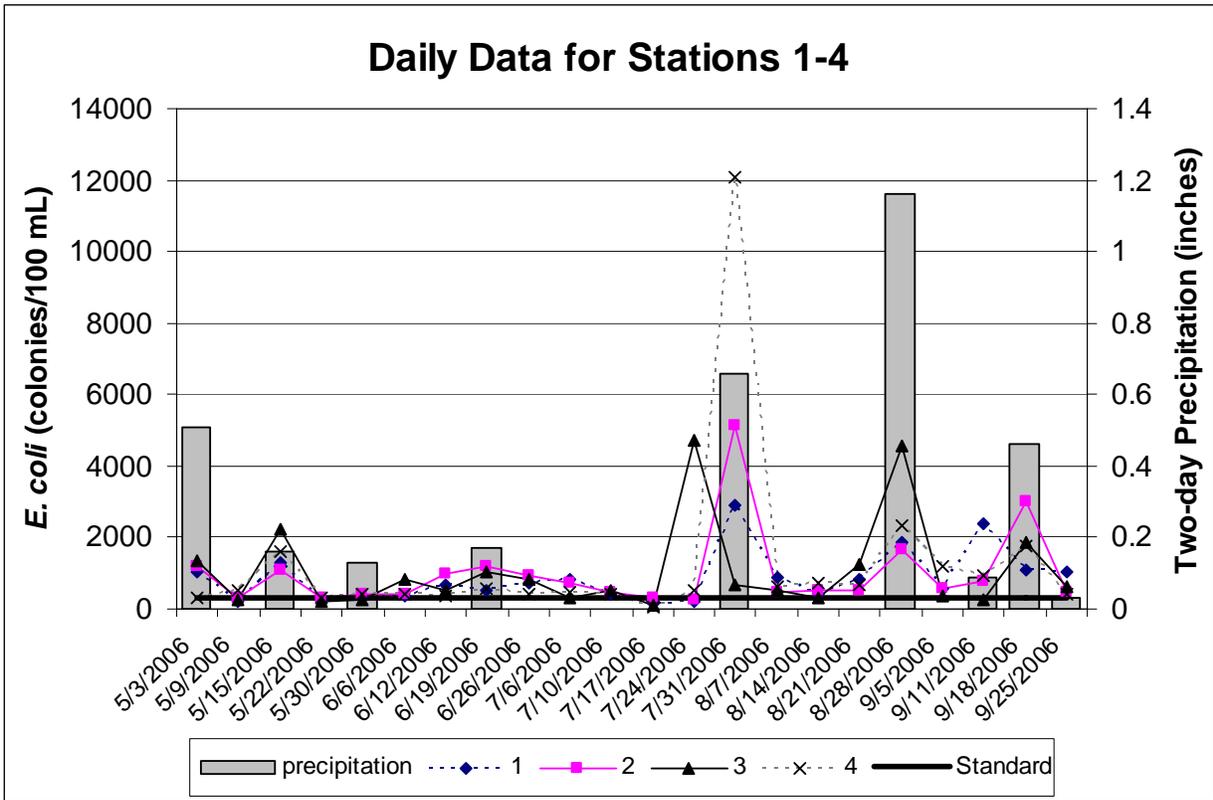


Figure 3. Daily Maximum *E. coli* sampling results from the South Branch River Raisin, Wolf Creek (Station 5), and Beaver Creek (Station 7).

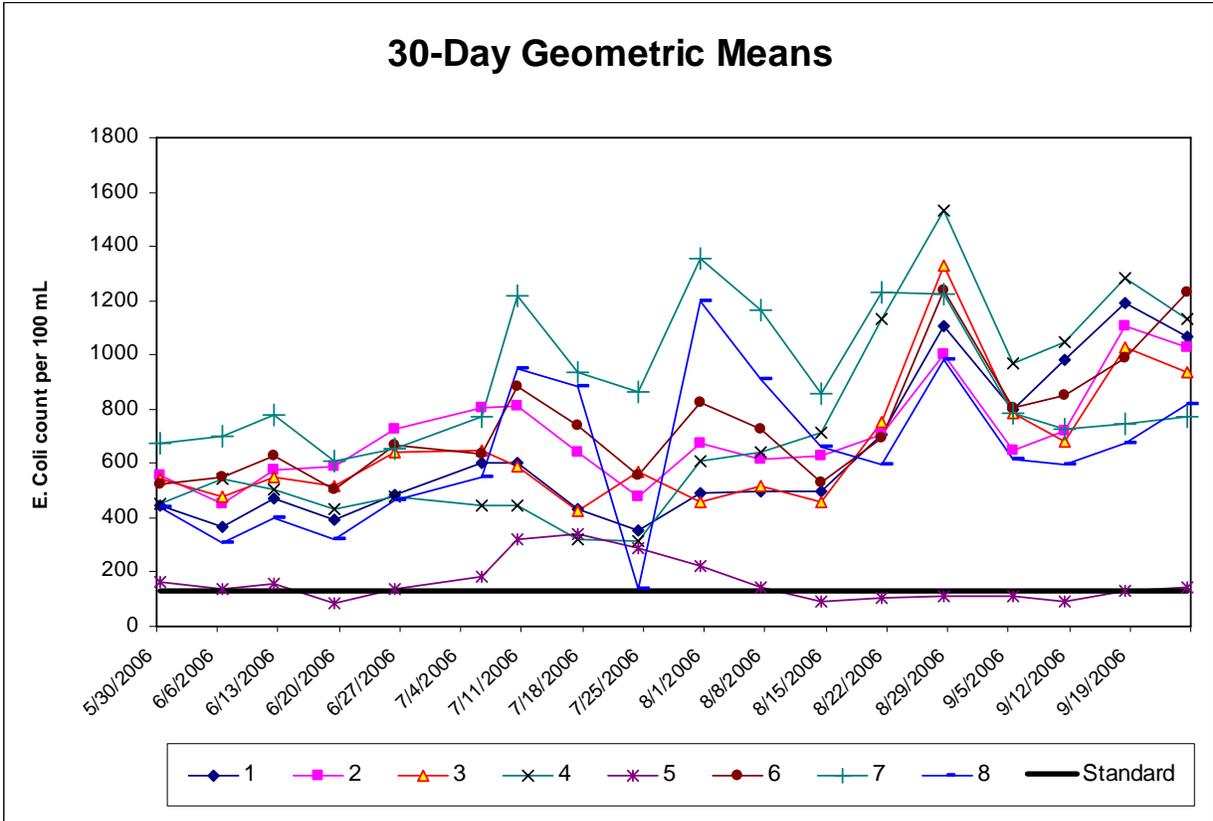


Figure 4. 30-day geometric mean data from the South Branch River Raisin, Wolf Creek (Station 5), and Beaver Creek (Station 7); May 30 through September 25, 2006.

Load Duration Curve for Station 1

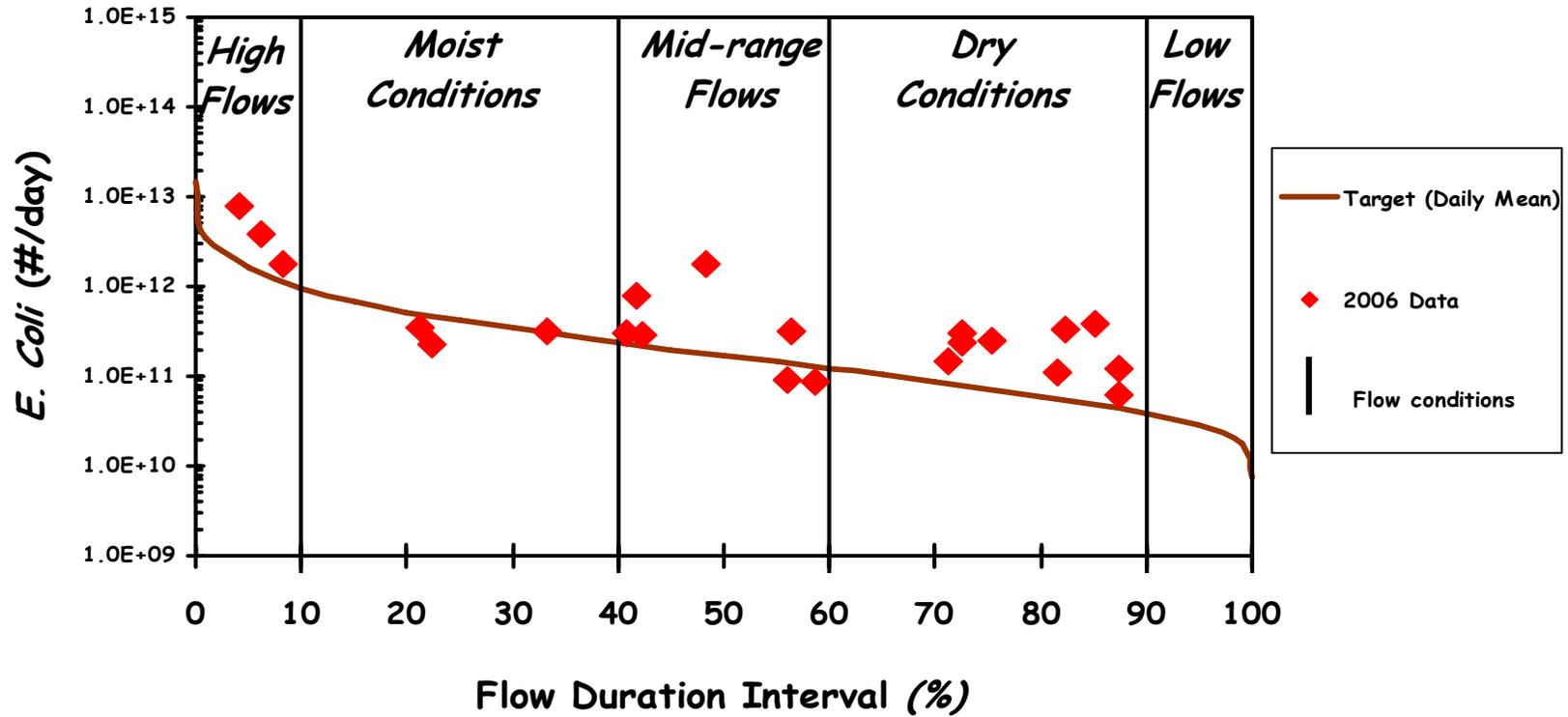


Figure 5. Flow duration curve for South Branch River Raisin at Cadmus Road (Station 1). *E. Coli* Data and USGS Gage Duration Interval 04176000, 85 square miles.

Load Duration Curve for Station 2

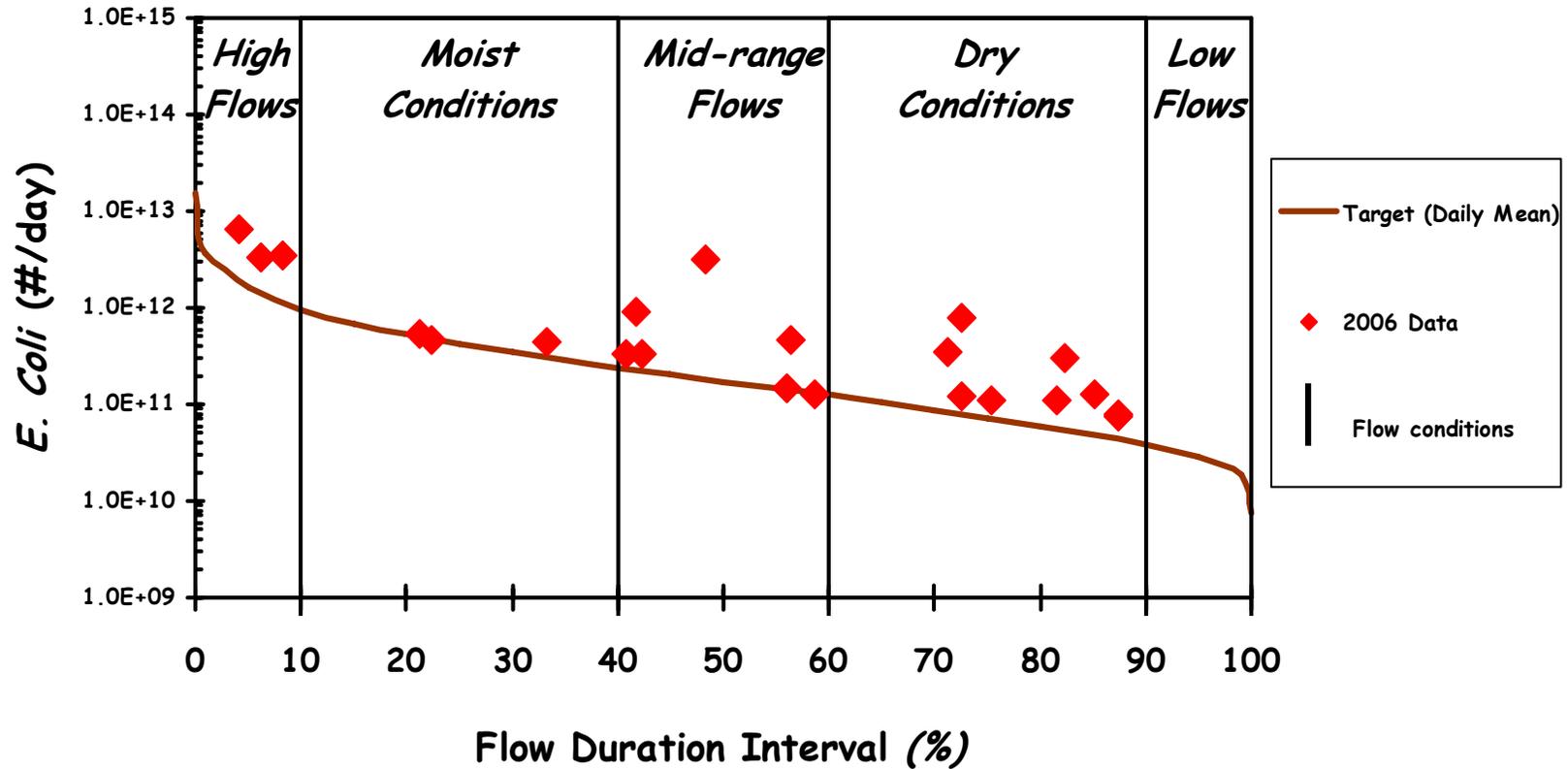


Figure 6. Flow duration curve for the South Branch River Raisin at Beecher Street (Station 2). *E. Coli* Data and USGS Gage Duration Interval 04176000, 86.3 square miles.

Load Duration Curve for Station 3

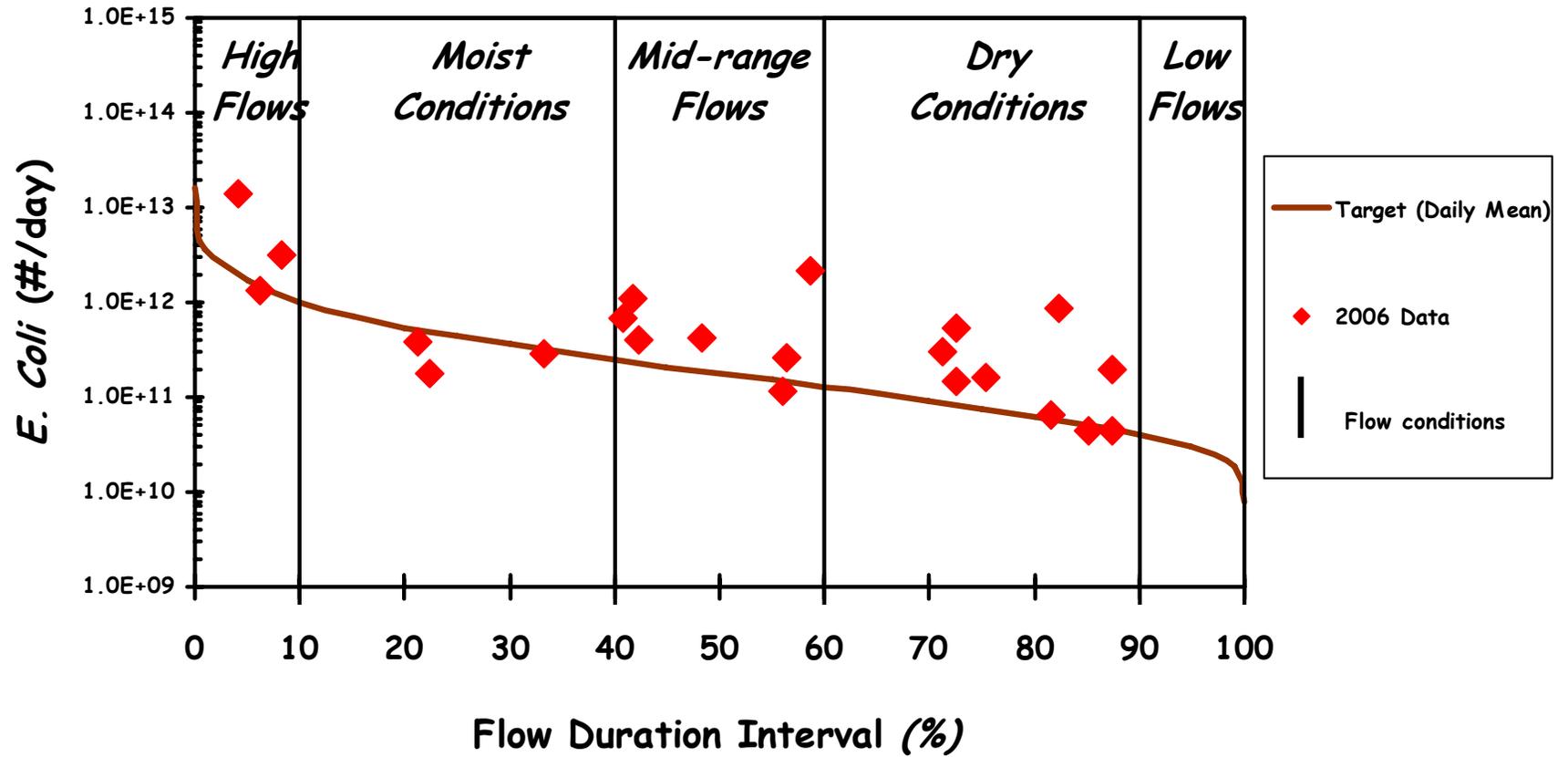


Figure 7. Flow duration curve for the South Branch River Raisin at Michigan Avenue (Station 3). *E. Coli* Data and USGS Gage Duration Interval 04176000, 89.3 square miles.

Load Duration Curve for Station 4

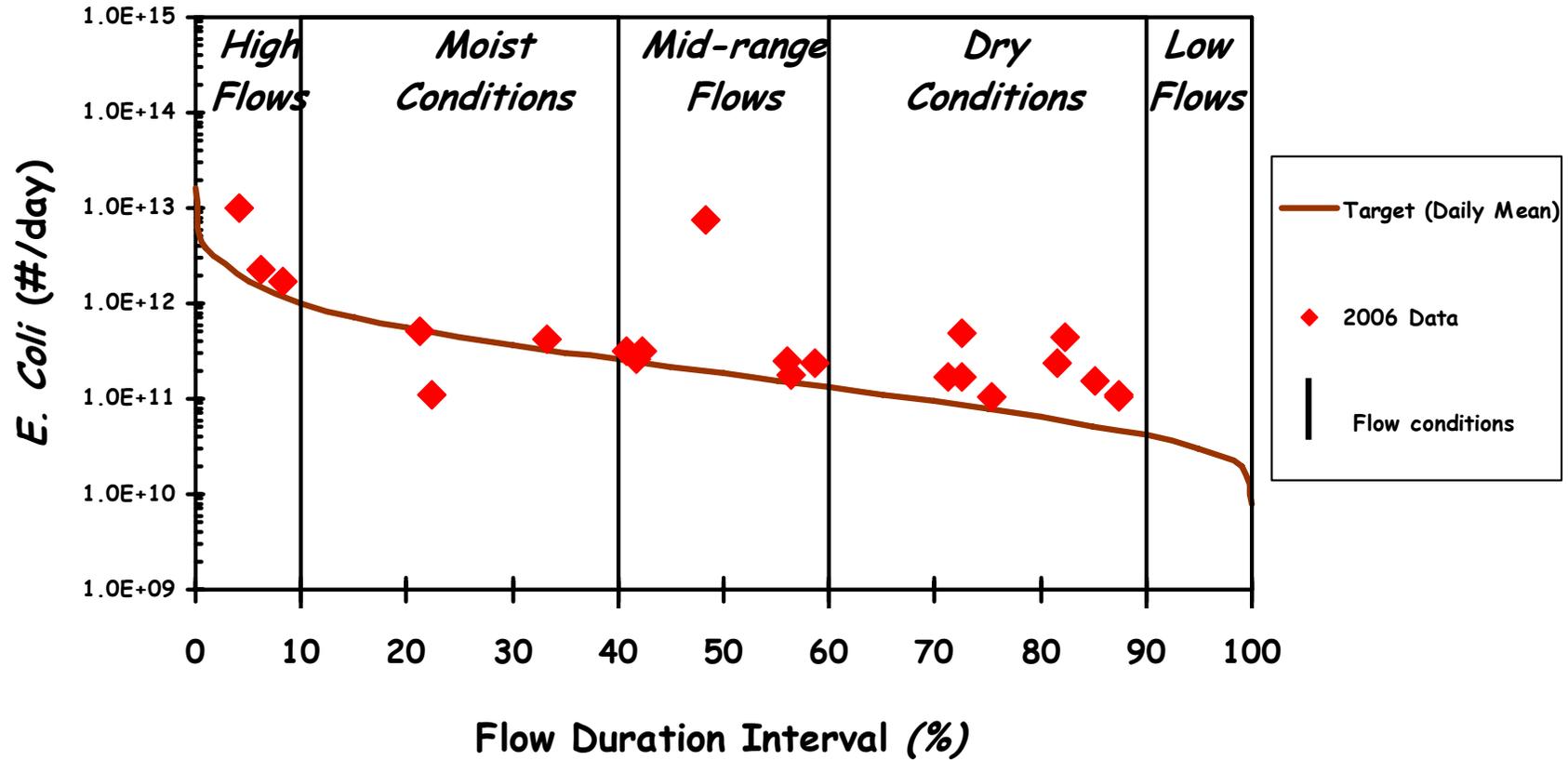


Figure 8. Flow duration curve for the South Branch River Raisin at Bent Oak Avenue (Station 4). *E. Coli* Data and USGS Gage Duration Interval 04176000, 91.1 square miles.

Load Duration Curve for Station 5

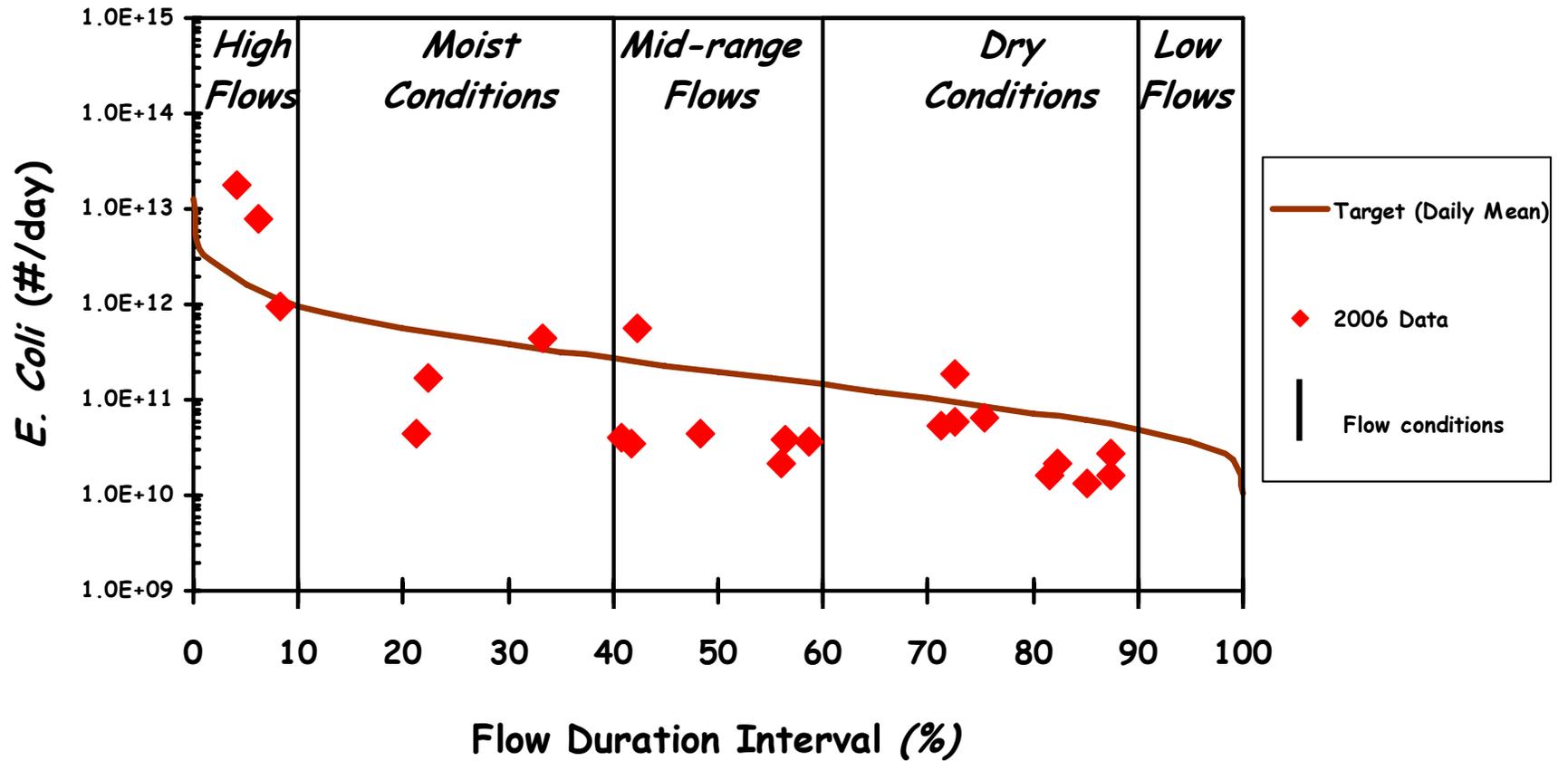


Figure 9. Flow duration curve for Wolf Creek at Bent Oak Avenue (Station 5). *E. Coli* Data and USGS Gage Duration Interval 04176000, 72.9 square miles.

Load Duration Curve for Station 6

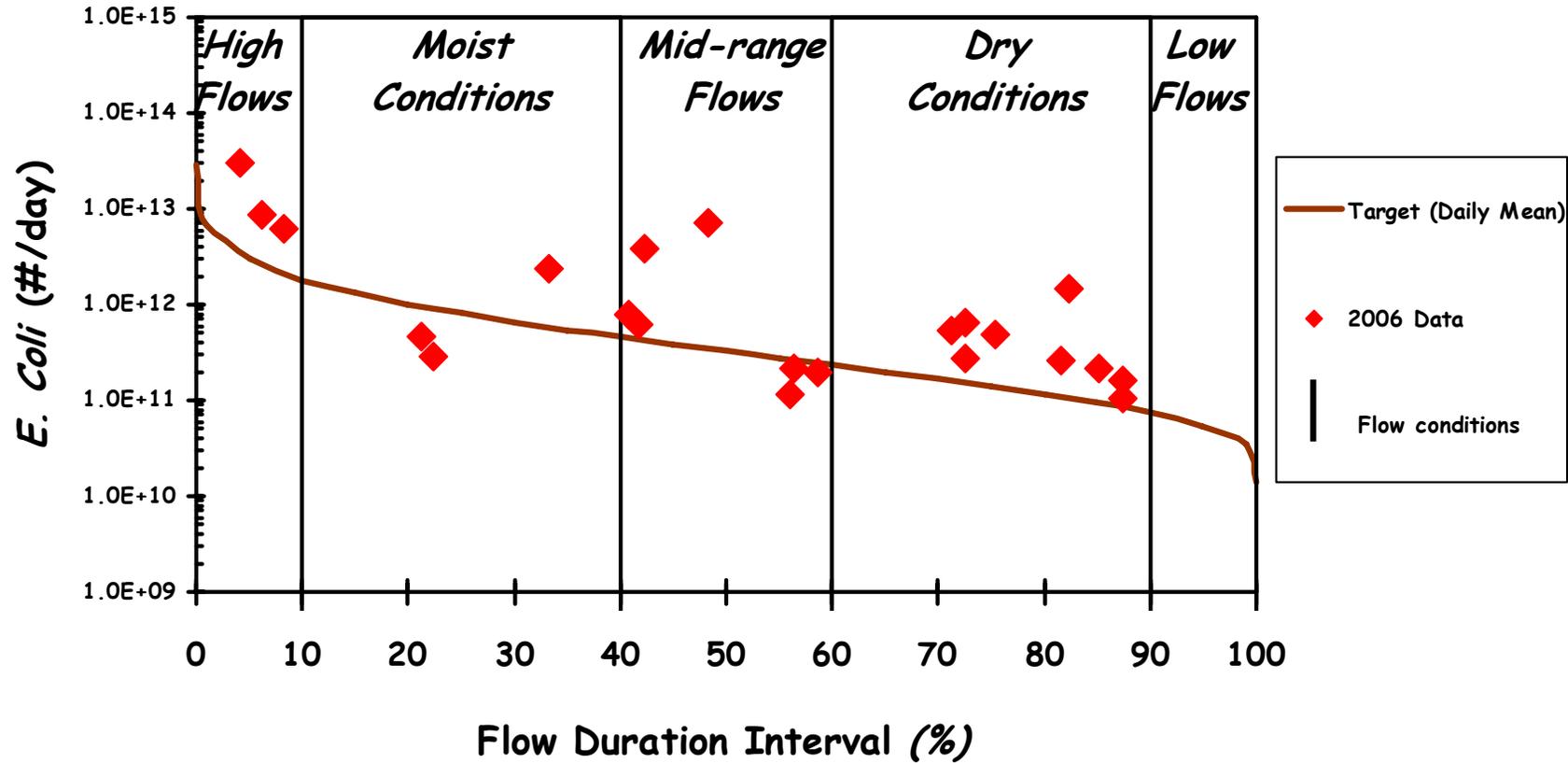


Figure 10. Flow duration curve for the South Branch River Raisin at M-52 (Station 6). *E. Coli* Data and USGS Gage Duration Interval 04176000, 164 square miles.

Load Duration Curve for Station 7

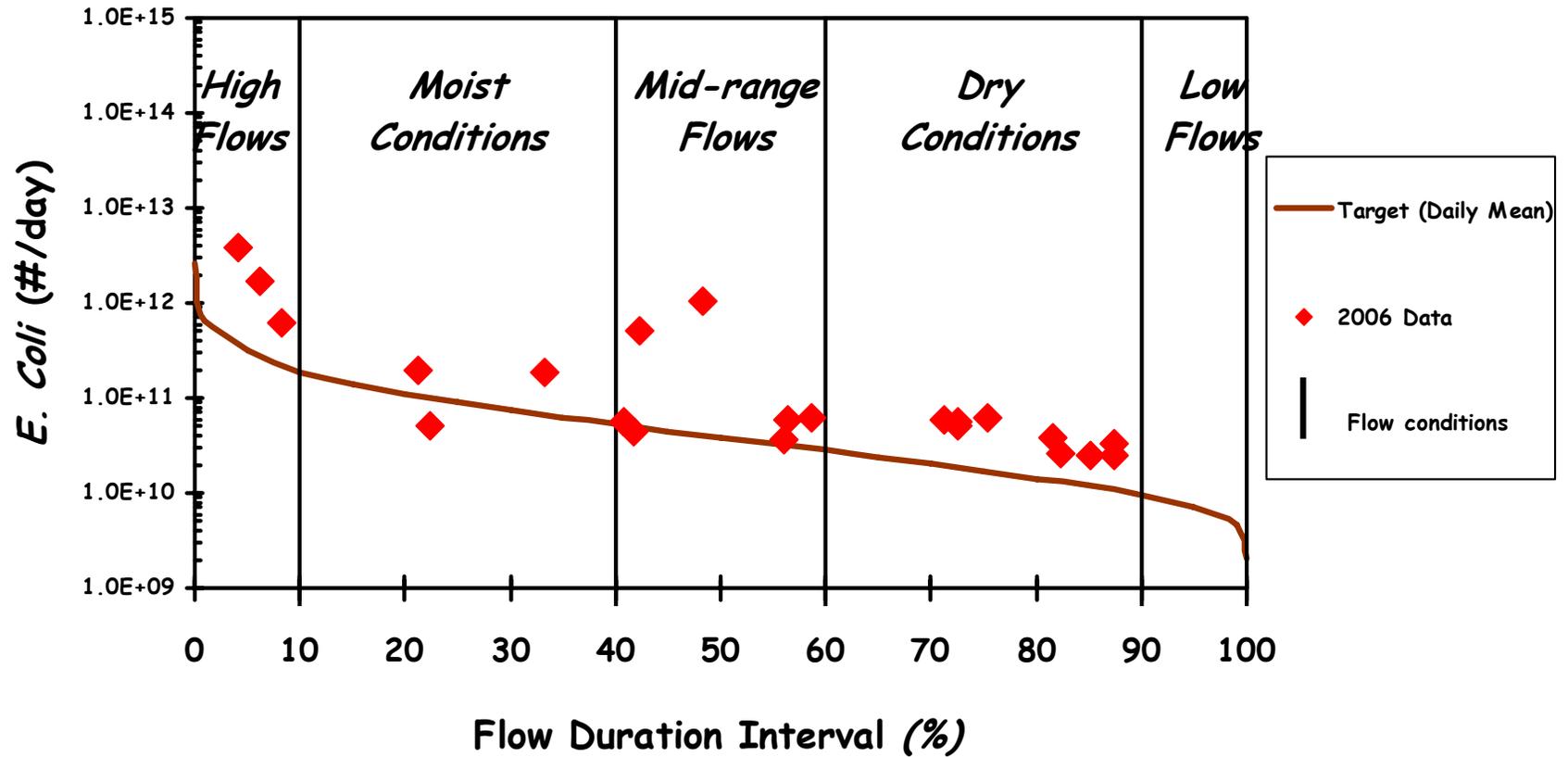


Figure 11. Flow duration curve for Beaver Creek at M-52 (Station 7). *E. Coli* Data and USGS Gage Duration Interval 04176000, 14.3 square miles.

Load Duration Curve for Station 8

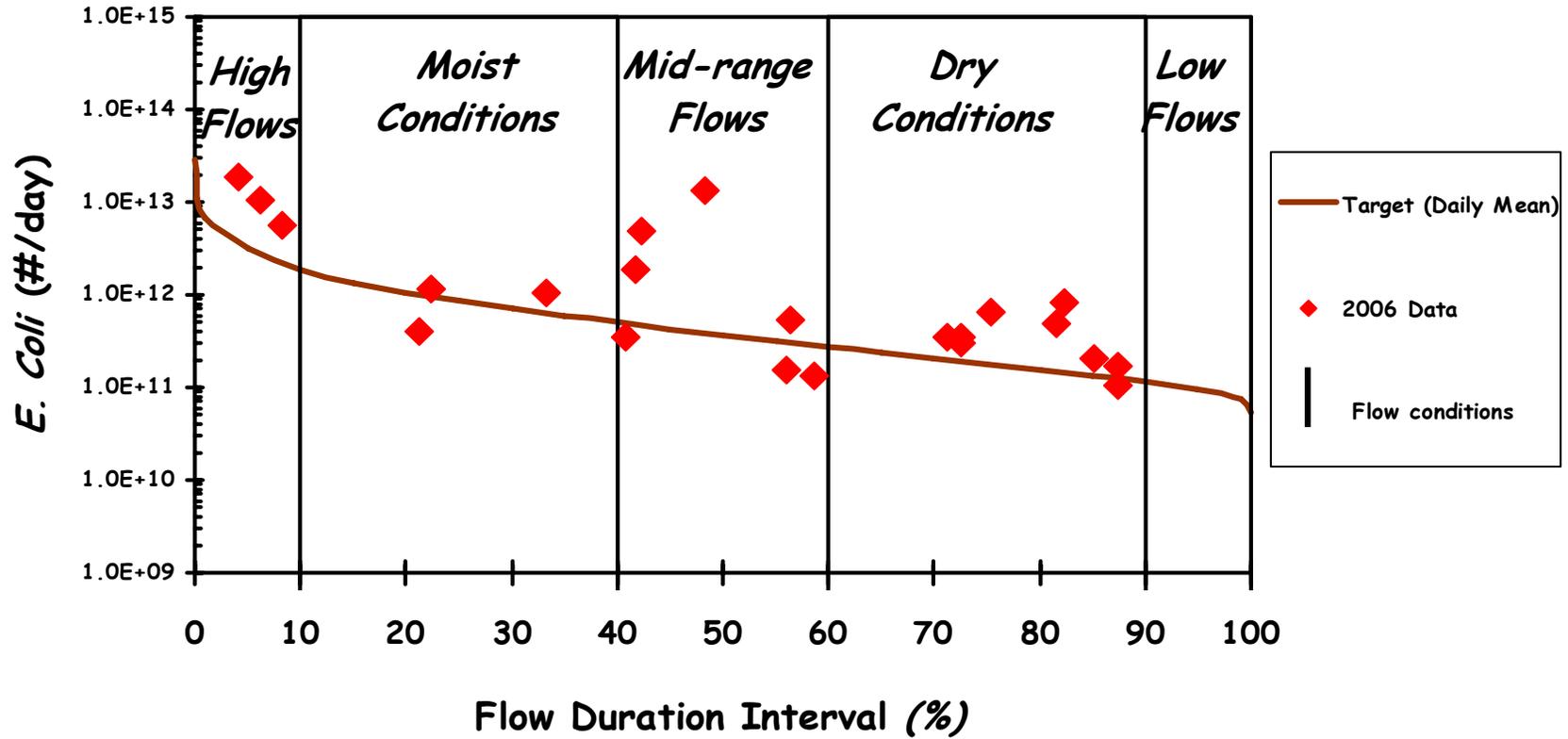


Figure 12. Flow duration curve for the South Branch River Raisin at Bent Oak Avenue (Station 8). *E. Coli* Data and USGS Gage Duration Interval 04176000, 165 square miles.

Table 1a. Weekly *E. coli* sampling results (counts per 100 mL) from the South Branch River Raisin (Stations 1-4), May 1-September 30, 2006. Exceedances of the WQS are shaded gray.

DATE	S. Br. Raisin River @ Cadmus Rd. (Station 1)			S. Br. Raisin River @ Beecher Street (Station 2)			S. Br. Raisin River @ Michigan Ave. (Station 3)			S. Br. Raisin River @ Bent Oak Ave. (Station 4)			Prior 2-Day Precipitation (inches)
	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	
5/3/2006	800 1200 1200	1048	---	1200 1000 1400	1189	---	800 1800 1800	1374	---	700 520 100	331	---	0.51
5/9/2006	160 380 120	194	---	300 240 380	301	---	200 280 140	237	---	580 400 580	512	---	0
5/15/2006	1000 1400 1500	1281	---	1400 600 1500	1080	---	2500 2000 2600	2236	---	1400 2500 1200	1613	---	0.16
5/22/2006	220 220 200	213	---	340 300 340	326	---	160 300 420	219	---	220 200 600	298	---	0
5/30/2006	400 200 400	317	446	1000 400 200	431	559	400 120 400	268	544	200 200 1500	391	455	0.13
6/6/2006	800 220 320	383	365	320 440 540	424	454	1000 900 660	841	481	1000 400 800	391	545	0
6/12/2006	2000 1000 160	684	469	800 1200 1000	986	576	800 1000 200	543	552	500 600 160	363	506	0
6/19/2006	460 400 800	528	393	1800 600 1600	1200	588	1200 800 1200	1048	518	600 800 400	577	432	0.17
6/26/2006	220 1000 500	707	487	1000 600 1400	944	728	1200 340 1400	830	639	640 180 720	436	476	0
7/6/2006	1200 600 800	832	599	800 1200 400	727	808	140 600 280	287	647	580 600 320	481	444	0
7/10/2006	400 400 380	393	602	720 200 600	442	815	460 540 540	512	586	380 600 300	409	448	0
7/17/2006	100 40 800	147	433	260 220 460	297	641	500 40 60	106	423	20 160 100	68	321	0.01
7/24/2006	200 400 100	200	352	320 200 360	285	481	120 200 800	4715	572	600 380 600	515	313	0
7/31/2006	6800 1800 2000	2904	489	3800 5000 7200	5153	675	3600 2800 10400	672	456	12600 9200 15200	12078	609	0.66
8/7/2006	800 600 1400	876	494	600 400 400	458	615	600 600 400	524	514	400 1000 600	621	641	0
8/14/2006	800 400 220	413	499	480 420 600	495	629	80 300 1000	288	459	1000 600 600	711	716	0
8/21/2006	1200 600 800	832	705	400 600 600	524	705	1800 800 1400	1263	752	1000 400 800	684	1135	0

Table 1a. Continued.

DATE	S. Br. Raisin River @ Cadmus Rd. (Station 1)			S. Br. Raisin River @ Beecher Street (Station 2)			S. Br. Raisin River @ Michigan Ave. (Station 3)			S. Br. Raisin River @ Bent Oak Ave. (Station 4)			Prior 2-Day Precipitation (inches)
	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	
8/28/2006	2200	1892	1106	1600	1664	1004	4600	4568	1327	2600	2326	1534	1.16
	2200			2400			14800			2200			
	1400			1200			1400			2200			
9/5/2006	800	577	800	800	577	648	120	337	783	1400	1215	969	0
	400			400			400			1600			
	600			600			800			800			
9/11/2006	1200	2400	979	1200	783	721	140	256	679	800	916	1047	0.09
	1200			400			400			800			
	9600			1000			300			1200			
9/18/2006	1000	1113	1189	6200	2983	1104	1800	1881	1028	3400	1769	1284	0.46
	800			3800			5800			1800			
	800			8400			3000			1600			
9/25/2006	2400	1048	1068	400	458	1027	400	635	937	1000	431	1135	0.03
	800			400			800			200			
	600			600			800			400			

Table 1b. Weekly *E. coli* sampling results (counts per 100 mL) from the South Branch River Raisin (Stations 5-8), May 1-September 30, 2006. Exceedances of the WQS are shaded gray.

DATE	Wolf Creek @ Bent Oak Ave. (Station 5)			S. Br. Raisin River @ M-52 (Station 6)			Beaver Creek @ M-52 (Station 7)			S. Br. Raisin River @ Howell Hwy. (Station 8)			Prior 2-Day Precipitation (inches)
	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	
5/3/2006	<20 <20 40	40	---	300 500 520	427	---	260 280 240	259	---	1040 1540 1000	1170	---	0.51
5/9/2006	40 20 80	40	---	180 120 100	129	---	300 260 500	339	---	100 140 220	145	---	0
5/15/2006	1500 1200 16000	3065	---	3600 5000 1000	2621	---	4200 4000 2000	3227	---	2200 2200 800	1570	---	0.16
5/22/2006	20 20 40	25	---	80 140 160	150	---	520 560 600	559	---	60 120 240	120	---	0
5/30/2006	120 400 1200	386	165	600 600 5000	1216	525	800 800 1000	862	672	800 800 200	504	438	0.13
6/6/2006	60 40 40	46	140	1400 300 340	523	549	320 360 300	326	703	80 400 280	208	310	0
6/12/2006	40 60 140	70	157	120 800 140	238	625	640 660 440	571	780	800 280 600	512	399	0
6/19/2006	60 200 340	160	87	1000 1200 800	986	507	760 1240 820	918	607	880 160 1000	520	320	0.17
6/26/2006	200 400 200	252	138	1600 700 600	876	666	1400 400 1000	824	656	1000 600 800	783	465	0
7/6/2006	1400 2200 1600	1702	185	1600 360 1600	973	637	2000 1800 2000	1931	770	2000 800 1000	1170	551	0
7/10/2006	440 690 1040	681	318	1400 3200 4600	2742	887	3200 3200 3200	3200	1217	1220 4400 5800	3146	949	0
7/17/2006	100 120 80	99	341	120 120 60	95	738	100 920 40	154	937	120 460 820	356	882	0.01
7/24/2006	100 60 60	71	290	220 420 140	235	554	660 520 700	622	867	120 100 220	138	138	0
7/31/2006	40 40 180	66	222	11000 5400 4200	6295	822	3400 40000 3400	7733	1356	9400 11800 10200	10420	1200	0.66
8/7/2006	200 200 150	182	142	600 600 400	524	726	800 640 1400	895	1163	600 600 400	524	911	0
8/14/2006	160 40 100	86	94	400 800 600	577	532	1200 360 800	702	858	140 140 800	250	659	0
8/21/2006	100 80 400	147	102	200 600 400	363	695	1000 400 2000	928	1229	600 600 180	402	597	0

Table 1b. Continued.

DATE	Wolf Creek @ Bent Oak Ave. (Station 5)			S. Br. Raisin River @ M-52 (Station 6)			Beaver Creek @ M-52 (Station 7)			S. Br. Raisin River @ Howell Hwy. (Station 8)			Prior 2-Day Precipitation (inches)
	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	SAMPLE RESULTS	DAILY MAX	30-day G. MEAN	
8/28/2006	40	99	108	4600	4163	1236	1400	607	1223	1400	1676	983	1.16
	60			5600			800			1200			
	400			2800			200			2800			
9/5/2006	140	70	110	400	737	805	600	832	783	1400	980	613	0
	40			1000			1200			600			
	60			1000			800			1120			
9/11/2006	20	65	89	1000	684	849	1000	621	728	400	458	597	0.09
	140			800			600			600			
	100			400			400			400			
9/18/2006	800	577	131	1000	1243	989	2200	808	749	600	458	673	0.46
	400			1200			200			400			
	600			1600			1200			400			
9/25/2006	100	229	143	800	1086	1231	800	1086	773	1000	1086	821	0.03
	120			1600			1600			1600			
	1000			1000			1000			800			

Table 2. Summary statistics for daily *E. coli* data (n=22) for each station.

Station	Description	Minimum Daily Geometric Mean	Maximum Daily Geometric Mean	Percent of sampling days with daily max. WQS exceedances (n=22)	Percent of daily max. variation explained by precipitation (r-squared)
1	South Branch River Raisin - Cadmus Rd.	147	2904	82%	41%
2	South Branch River Raisin - Beecher St.	285	5153	95%	42%
3	South Branch River Raisin - Michigan Ave.	106	4715	77%	29%
4	South Branch River Raisin - Bent Oak Rd.	68	12078	91%	27%
5	Wolf Creek - Bent Oak Rd.	25	3065	23%	0%
6	South Branch River Raisin - M-52	95	6295	77%	49%
7	Beaver Creek - M-52	154	7733	91%	8%
8	South Branch River Raisin - Cadmus Rd.	120	10420	77%	20%

Table 3. Individual and General Permits in the South Branch River Raisin watershed. NOCs are not listed. Source: MDEQ, Water Bureau's NPDES Permit Management System.

Facility Name	Permit	Township	Latitude	Longitude
Individual Permit				
Adrian WWTP	MI0022152	Adrian	41.9172	-84.0150
Lenawee CDC-Loch Erin WWTP	MI0053848	Cambridge	42.0000	-84.1175
MDOT MS4	MI0057364	Statewide	na	na
Onsted WWTP	MI0028304	Cambridge	41.9955	-84.1647
Hartland Farms-CAFO	MI0057536	Hudson	41.8947	-84.2739
MIG250000 General Permit - Non-Contact Cooling Water				
Aget Mfg Co	MIG250412	Adrian	41.8958	-84.0169
PPG Industries Inc-Adrian	MIG250413	Madison	41.8844	-84.0203
Dairy Farm of Amer-Adrian	MIG250425	Adrian	41.9000	-84.0333
MIG580000 General Permit - Wastewater Stabilization Lagoons				
Clayton WWSL	MIG580319	Dover	41.8750	-84.2500
MIG640000 General Permit - Wastewater Discharge from Munciple Potable Water Supply				
Madison Charter Twp-WTP	MIG640209	Madison	41.8667	-84.0500
Adrian WTP	MIG640224	Adrian	41.9109	-84.0425
MIS510000 General Permit - Storm Water Discharges from Industrial Activities				
UPS-Adrian	MIS510065	Madison	41.8975	-84.0222
Rosler Metal Finish-Adrian	MIS510068	Madison	41.8804	-84.0359
Adrian Asphalt Company	MIS510073	Madison	41.8781	-84.0161
Roto Plastics Corp	MIS510079	Madison	41.8856	-84.0256
Adrian Fabricators	MIS510125	Madison	41.8856	-84.0311
Foster Auto Sales	MIS510138	Madison	41.8778	-84.0167
Johnsons Used Cars & Parts	MIS510148	Dover	41.8611	-84.2336
Delphi-Adrian	MIS510187	Madison	41.8889	-84.0139
Inergy Automotive Systems Inc	MIS510190	Madison	41.8881	-84.0708
Merillat Industries-Adrian	MIS510191	Madison	41.8886	-84.0644
Hydro Aluminum Adrian Inc	MIS510192	Madison	41.8961	-84.0114
Biolab Inc-Adrian	MIS510196	Madison	41.8942	-84.0172
Adrian Steel Company	MIS510215	Madison	41.8875	-84.0250
Doan Companies-Adrian	MIS510218	Madison	41.9458	-83.9875
Dusseau Auto Parts-Adrian	MIS510224	Madison	41.8833	-84.0167
Jackson Iron & Metal-Adrian	MIS510225	Madison	41.8917	-84.0250
Countryside Auto Recyclers	MIS510226	Dover	41.8875	-84.1542
Ervin-Ama Steel Div-Adrian	MIS510228	Fairfield	41.8875	-84.0250
Kuhlman Corporation	MIS510248	Madison	41.9042	-84.0375
Doan Companies-Onsted	MIS510440	Cambridge	42.0142	-84.1986
Meyers Boat Corp	MIS510494	Madison	41.8908	-84.0317
Cyltec LLC	MIS510593	Raisin	41.9719	-83.9669
Hager Distribution	MIS510695	Dover	41.8662	-84.2253
Next Diesel	MIS510704	Madison	41.8870	-84.0752

Table 4. Percent of land area in South Branch River Raisin watershed located within each municipality.

Municipality Names	Percent of TMDL Watershed
Franklin	5%
Cambridge	12%
Raisin	5%
Rome	19%
City of Adrian	4%
Adrian	18%
Dover	17%
Madison	11%
Rollin	3%
Hudson	2%
Seneca	2%