

## **APPENDIX G**

SEWRPC Letter January 14, 2005- SEWRPC Staff Comments "Draft MMSD 2020  
FP/RWQMP Technical Memorandum: Point Source Loadings Calculations for  
Purposes of Watercourse Modeling Dated December 13, 2004.

## SEWRPC STAFF COMMENTS

### DRAFT MMSD 2020 FP/RWQMPU TECHNICAL MEMORANDUM: POINT SOURCE LOADINGS CALCULATIONS FOR PURPOSES OF WATERCOURSE MODELING DATED DECEMBER 13, 2004

#### GENERAL MITCHELL INTERNATIONAL AIRPORT (GMIA)

It is not clear how the winter pollutant loads from GMIA flowing into Wilson Park Creek can be ignored, while knowing that the runoff at GMIA is still likely exhibiting concentrations in excess of two to three orders of magnitude higher BOD concentrations than typical urban runoff. There is no documentation to indicate that efforts instituted by GMIA since 2000 to manage and reduce deicing runoff have had appreciable impact. If there was, it may explain how these loadings are no longer significant. However, the variations in the instream data as reported in Wilson Park Creek could be a result of deicing (November to April) versus nondeicing times of the year. It would be advisable to review the monitoring data to see if there is a trend in the BOD and DO levels by season. Because we have previously indicated that this source would be handled as a point source, we recommend it be specifically modeled.

#### OUTSTANDING ISSUES

The memorandum contains five outstanding issues that either need to be addressed or will need to be addressed shortly. These issues should be addressed in this memorandum. The issues noted are:

1. In pollutant loading section 3.3 it is noted that a separate memo is being prepared to define the river reaches. We note that this has already been completed, but needs some refinements. We recommend that the memo be referenced. In sections 3.3 and 6.2.4 you also note that the point source pollutant locations were plotted on a map using designated GIS locations and aggregated according to river reach. We recommend you reference the appropriate GIS file in this memo. We also request you send us a copy of that GIS file so we can be sure our point inventory is consistent.
2. Procedure for estimating local community SSO inputs for production runs (Section 5.3)
3. Location of modeled noncontact cooling water discharge locations (Section 6.2.1). Can latitude/longitude information be obtained to confirm reach designations?
4. What procedure has been developed to address heat loads from noncontact cooling water discharges? (Section 6.2.4)

5. Specifically, how will pollutant loadings be modified for those industrial dischargers that take in river water for cooling water? (Section 6.2.4)

## ANCILLARY ISSUES

- Table 1 has three reference notes placed within the table, but four notes are given at the bottom of the table. Place note number 4 at the appropriate place in the table.
- Table 2, footnote number 2 has E-coli spelled as “e-coil”.
- In Table 6, consider adding the following sentence at the end in footnote number 6. “The r squared values of 0.61 and 0.64, which estimates the amount of variance accounted for by the regression of BOD versus organic nitrogen and BOD versus ammonia, respectively are based upon the ORVWSC data set.”
- Table 9 has two reference notes listed after the title, but no notes are given below the table. Include the missing notes below the table.
- The last sentence of Section 6.2.4 reads, “The 2020 Team *will may* elect to modify their pollutant loads.” (emphasis ours) The double verb here creates some confusion as to what is being said.

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