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**4.4 Conventional Pollutants (continued)**


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**Pollutants of Concern****Basis***Escherichia coli (E.coli)*

EPD considers all POTWs, Private and Institutional Developments, and CSO Control Facilities, discharging all or a portion of domestic sanitary wastewater, to have the reasonable potential to cause or contribute to instream water quality standard violations for bacteria, including the conventional pollutant fecal coliform, but also *Escherichia coli*, and Enterococci. EPD has determined these facilities discharge bacteria, wastewater treatment systems are designed to limit bacteria levels in the effluent, and bacteria are highly variable in the receiving stream after treatment. Furthermore, dilution is not considered in EPD's analysis as bacteria have the inherent ability to reproduce in the receiving stream.

As part of the 2019 Triennial Review, approved by US EPA on August 31, 2022, EPD adopted new bacterial indicators (*E. coli* and Enterococci) for waterbodies with a designated use of fishing, coastal fishing, and drinking water to protect secondary contact recreators who may inadvertently ingest water.

In accordance with EPD's *Bacteria Equivalency Strategy for Using the Optimal Indicator Organisms for WQS and NPDES Permitting, 2022* for discharges into freshwaters, a monthly average *E. coli* limit of 126 counts/100 mL and a weekly average limit of 410 counts/100 mL (equivalent to the Statistical Threshold Value) have been included in the draft permit.

The facility is equipped with a disinfection system, therefore a compliance schedule to meet the updated bacteria limit has not been included in the draft permit.

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