



**REGION 10**  
SEATTLE, WA 98101

September 25, 2025

Mr. James Kardouni  
Washington Department of Ecology  
Water Quality Program  
913 Squalicum Way #101  
Bellingham, WA 98225  
[james.kardouni@ecy.wa.gov](mailto:james.kardouni@ecy.wa.gov)

Re: EPA Comments on the Draft Drayton Harbor Bacteria TMDL

Dear James:

The U.S. Environmental Protection Agency has reviewed the Washington Department of Ecology's Drayton Harbor Bacteria TMDLs, which was released for public comment from August 21, 2025, to September 26, 2025. The EPA's comments on the TMDL document, Implementation Plan, and associated appendices are listed below.

1. In Table 2, the Listing ID (88406) associated with AU WA17110004016438\_001\_001 appears to be incorrect. Based on Washington's Water Quality Assessment tool, it looks like the correct listing ID should be 88409.
2. On page 59 in the 'Reasonable Assurance' section, Ecology notes that "If there is no reasonable assurance, EPA guidance indicates that the load reductions must be transferred to point sources." What is the EPA guidance that is being referenced here? It should be cited.
3. Appendix E provides details on the equations used to calculate the TMDL Loading Capacity, Wasteload Allocations, and Load Allocations. For example, Equation 18, which is used to calculate the loading capacity, is provided in Appendix E on page 288. While there is narrative following the equation that explains how it is applied, there is not a clear example calculation showing the data inputs used to calculate the loading capacity. Similarly, Equations 19 through 22 have narrative explaining how the TMDLs, WLAs, and LAs are calculated, but do not provide examples of the equations being applied with the appropriate data inputs. Please provide clearer example calculations in the TMDL document.
4. While data are summarized in the TMDL and appendices, it is not clear which data is being used to make specific calculations for load allocations, wasteload allocations, loading capacity, and the application of the statistical rollback method. The EPA recommends that, at a minimum, Ecology cite the applicable data and equations used to calculate allocations, loading capacity, and in the statistical rollback method in the main TMDL document or in one of the appendices.

5. The Load Allocation section (p.58) simply references the TMDL summary in Tables 6 & 7. The Load Allocation section of the document should include more detail on how the load allocations were calculated, and provide example load calculations, or reference the appendices where this information is included.
6. On page 47 in reference to the Lighthouse Point WWTP WLA, Ecology cites the following: *"Modeling demonstrates that under critical conditions, the permitted discharge predicts no exceedance of the water quality criteria at the edge of the chronic mixing zone resulting in 10 FC cfu/100 mL."* It is not clear what model/modeling work this is in reference to. The EPA recommends that Ecology cite the model asserted here.
7. On page 59 in the 'Reasonable Assurance' section, Ecology notes that "If there is no reasonable assurance, EPA guidance indicates that the load reductions must be transferred to point sources." What is the EPA guidance that is being referenced here? It should be cited.
8. Washington's 2018 303(d) List was approved by the EPA on August 26, 2022. However, Washington Department of Ecology submitted their 2022 List to the EPA earlier this year, which is still awaiting final EPA action. There appear to be a few waters covered by the Drayton Harbor Bacteria TMDL that will have listing changes if the 2022 list is approved by the EPA. If the 2022 list is approved before the Drayton Harbor Bacteria TMDL is submitted to the EPA for final action, the TMDL should be updated to reflect the listing changes.

We appreciate Ecology's extensive work on this TMDL. The EPA also appreciates the opportunity to work with Ecology and looks forward to continued coordination as you finalize this TMDL report. If you would like to discuss these comments, you can reach me at 206-553-6366 or [Coull.Sarah@epa.gov](mailto:Coull.Sarah@epa.gov).

Sincerely,

Sarah Coull  
Water Division

cc: Cleo Neculae, Ecology