



Memo

To: Charleston County; Town of James Island; City of Charleston

From: Woolpert, Inc.

Date: January 31, 2022

Subject: James Island Creek Grab Sampling Results Memo: DRAFT
Fall 2021 – data through December 2021

The James Island Creek TMDL for Enterococcus bacteria became effective in January 2020, and to maintain compliance with their NPDES General Permit, Charleston County, the Town of James Island, and the City of Charleston (the permittees) were required to submit a TMDL Monitoring Plan to SCDHEC within 12 months of the TMDL effective date (January 2021) and begin monitoring activities within 18 months of the TMDL effective date (July 2021). In accordance with the submitted TMDL Monitoring Plan, the permittees initiated monitoring activities in July 2021 and collected the first seasonal wet weather grab sample in August 2021. The sampling efforts have targeted both wet and dry conditions in order to assess bacteria concentrations in James Island Creek in response to storm events and during base flow conditions. This memo summarizes and discusses data collected through December 2021. It will be a cumulative document with new data added to the existing dataset as additional samples are collected. All sample results (August 2021 through December 2021) and notes about associated weather and tidal conditions are included in Appendix A.

Grab sampling efforts have included taking samples at three strategic locations in the watershed, shown in **Figure 1** below. The downstream-most site (Harbor View Bridge) is located at the bridge where Harbor View Road crosses James Island Creek. Continuing up the main stem of James Island Creek, the next site (Folly Road Bridge) is located at the bridge where Folly Road crosses James Island Creek. The upstream-most site (Riley Road) is located at the end of Riley Road, approximately 0.5 miles upstream of Folly Road Bridge. The contributing drainage area to all locations includes human influence from suburban, urban, and developed areas. The Folly Road Bridge sampling location was added in December 2021 in response to input from the James Island Creek Task Force. It is anticipated that sampling locations may be added or modified in the future based on stakeholder input and as additional site access permissions are secured.

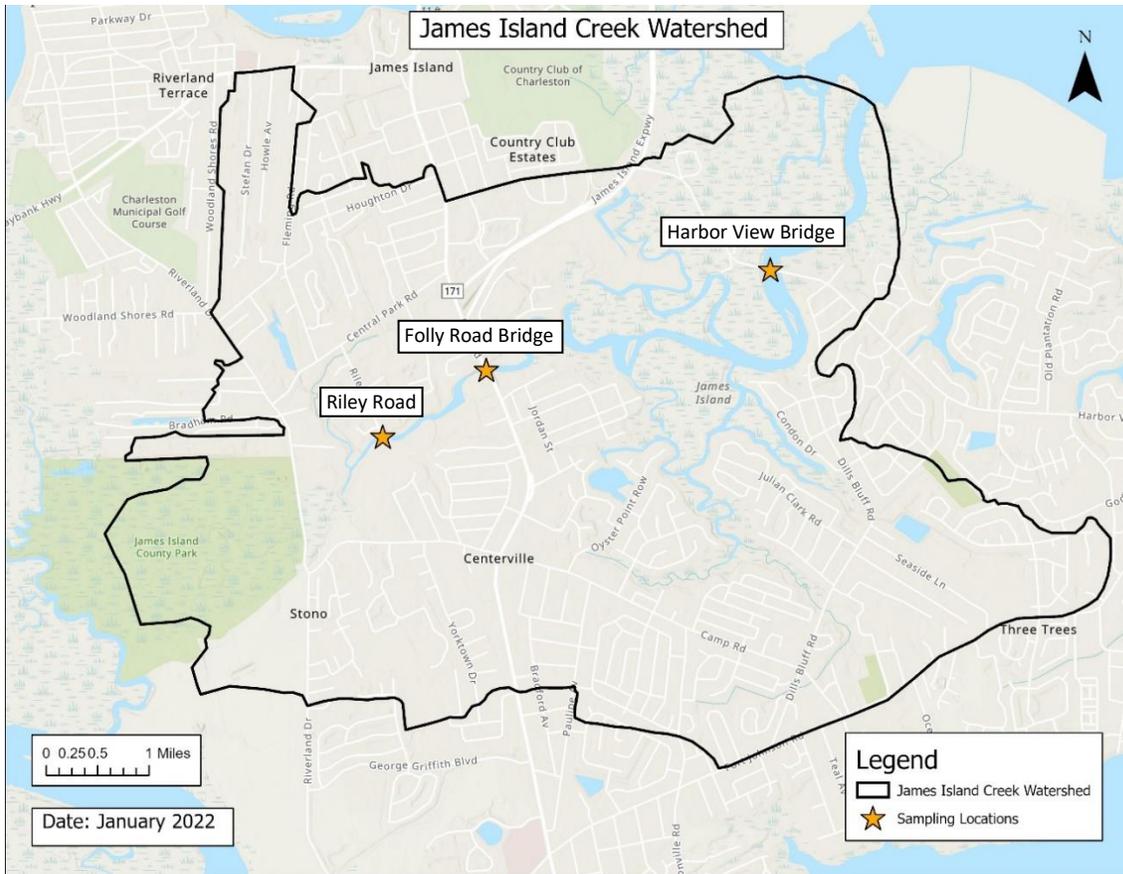


Figure 1: James Island Creek Sampling Locations

Samples were analyzed by Trident Laboratory in Ladson, SC, an EPA-approved laboratory, for Enterococcus bacteria using the SM-9230D method and results were reported as the Most Probable Number of bacteria per 100 milliliter sample (MPN/100ml). Summary statistics for Enterococcus grab sampling results to date (through December 2021) are shown in

Table 1 for each sampling location and weather condition. As of this memo, sampling has taken place during only Summer and Fall seasons, so the summary statistics are not representative of the water quality throughout the year and interpretation and discussion of the data will be limited until the sample size has increased.

Table 1: Summary Statistics for Grab Sample Enterococcus Results - By Location and Weather Condition

Sampling Location	Weather Condition	Summary Statistic (units of MPN/100ml)				# of Samples
		Mean	Median	Maximum	Minimum	
Harbor View Bridge	Dry	31	10	140	10	15
Harbor View Bridge	Wet	187	75	810	10	12
Folly Road Bridge ¹	Dry	223	220	310	140	3
Folly Road Bridge	Wet	—	—	—	—	—
Riley Road ²	Dry	276	209	1110	40	14
Riley Road	Wet	1618	585	8160	10	12

¹Folly Road Bridge sampling location added in December 2021.

²One outlier result of 17,330 MPN/100ml on 11/24/21 was excluded from summary statistics; trash dumping occurred at the sampling location prior to collection and appeared to influence bacteria concentration.

Due to the many factors that influence bacteria concentrations (e.g., potential bacteria sources, season, weather, rainfall intensity, antecedent rainfall, tides, timing of watershed storm response), it is important to consider individual storm results in their own context in addition to summary statistics. To facilitate this kind of assessment, figures were created to illustrate the grab sampling results at each location along with approximate relative stage in James Island Creek, approximate rainfall data (for wet weather sampling), and observations about weather and tidal conditions. These figures were created for all sampling efforts and are located in Appendix B in chronological order. Available tide prediction and rainfall data were used to best approximate conditions in James Island Creek during sampling. Tide prediction data was obtained from NOAA station #8665530 "Charleston, Cooper River Entrance, SC" which is approximately 2.5 miles northeast from the Harbor View Bridge sampling location. For the wet weather sampling efforts, rainfall data was obtained from the Town of Mount Pleasant's Ravenel Bridge rain gauge, approximately 4.5 miles northeast of Harbor View Bridge. This gauge represents the closest source of incremental rainfall data that is available to approximate rainfall in the James Island Creek watershed. For the purposes of analysis and discussion, a "storm rainfall" was established which was a running sum of rainfall until 3 consecutive hours go by with zero additional precipitation that occurred closest to the time of sampling. In some cases, if there was additional rainfall outside the "storm rainfall" that was relevant to describing the watershed conditions, analysis may refer to a "total rainfall" or "largest storm rainfall" that is larger than the "storm rainfall" that occurred closest to the time of sampling.

Overall Trends

The summary statistics as well as individual storm results were reviewed and compared to observe trends and/or correlations between bacteria concentration sampling results and a variety of potential associated factors. It is important to note that with this limited data set, the following discussion is not asserting statistical significance, but rather seeking to explore possible relationships in an effort to start to understand the complex natural aquatic system of James Island Creek. The summary statistics in

Table 1 indicate two overall trends with respect to Enterococcus concentrations: higher concentrations in the upper portion of the watershed (Folly Road Bridge and Riley Road) than the lower portion (Harbor View Bridge) and higher concentrations in wet conditions than in dry conditions. When comparing individual storm results in Appendix A (list form) and Appendix B (graphical form), it does appear that bacteria concentrations tend to be higher in wet weather conditions than dry weather conditions. However, a comparison of results for individual wet weather versus dry weather sampling efforts does not provide a clear trend; there is variation among both the wet weather events and dry weather events (e.g., some dry weather samples are slightly higher than some wet weather samples, contrary to the overall trend seen with summary statistics). This variation may be driven by some or all of the factors influencing bacteria concentrations mentioned previously. The limited dataset of grab sample results provides a glimpse of the water quality conditions that may also contribute to these variations. Though the dataset is limited, the following sections provide a discussion of specific sampling events and how they may or may not show potential trends for wet and dry weather conditions.

Wet Weather Sampling

The goal of wet weather sampling is to quantify the bacteria levels present in stormwater runoff by collecting grab samples during or soon after storm events. In tidal systems, such as James Island Creek, it can be difficult to differentiate between stormwater runoff and tidal flow using only nearby available stage and rainfall data. For purposes of discussion, bacteria concentrations will be approximated as order of magnitude. From the available grab sampling data, wet weather results at Harbor View Bridge have been observed to vary by two orders of magnitude, typically in the "tens" (10-99 MPN/100ml) and "hundreds" (100-999 MPN/100ml). Wet weather results at Riley Road have been observed to vary by three orders of magnitude, sometimes as low as the "tens" and sometimes as high as the "thousands" (10^3).

A brief description of each wet weather sampling effort since August 2021 is provided below.

- The August 2021 event (8/3/2021) had a rainfall total of 0.20" prior to sampling with samples collected from low to high tide, as the tide rose. The bacteria levels were relatively low, in the "tens" at Harbor View Bridge and varied between "tens" and "hundreds" at Riley Road. Additional rainfall was forecast to occur before and during the sampling window but did not actually occur until later in the day after the available sampling window (limited by laboratory hours).

- The September 2021 event (9/21/2021) had a rainfall total of 2.39" prior to and during sampling with samples collected from high to low tide, as the tide fell. This larger storm event correlated with relatively high bacteria levels (results in the "hundreds" at Harbor View Bridge and results in the "thousands" at Riley Road).
- The December 2021 event (12/8/2021) had a rainfall total of 0.96" that fell primarily in two waves, one a few hours before sampling began and one while sampling occurred. Results were in the "hundreds" and "thousands" at Riley Road. Results at Harbor View Bridge were one order of magnitude lower, varying between values in the "tens" and "hundreds".

Comparing the wet weather sampling events thus far, the events with more rainfall associated with sampling had higher observed bacteria concentrations. The falling tide may also be associated with higher observed bacteria concentrations, when compared to samples taken during the rising or near a slack high tide. As additional data is collected, potential correlations between bacteria concentrations and tidal conditions, seasons, or other rainfall characteristics will be considered.

Dry Weather Sampling

Dry weather sampling intends to provide some background, baseline bacteria levels in James Island Creek to represent conditions not influenced by stormwater runoff. These levels could be attributed to wildlife in or near the water, historic deposits, non-stormwater human contributions, or aquatic life. In order for sampling to be considered "dry weather," at least 72 hours must have passed since the last instance of greater than or equal to 0.1" of rainfall.

Dry weather results at Harbor View Bridge were low, with the majority of results being in the "tens" order of magnitude or less. Dry weather results at upstream sites (Folly Road Bridge and Riley Road) were higher and more variable than at Harbor View Bridge, with results varying from the "tens" to the "thousands" order of magnitude. The bacteria concentrations at all sites may demonstrate correlation with tidal conditions, as most sampling events showed higher results during lower tidal conditions. Correlation between bacteria concentration and tide, as well as other environmental factors, will continue to be assessed as additional data is collected.

Microbial Source Tracking Results

While the presence of Enterococcus bacteria acts as an indicator to detect fecal contamination, it does not indicate the origins of fecal contamination. Understanding the sources of contamination is essential for identifying effective remediation measures (BMPs), complying with legal (permit) responsibility, and characterizing potential public health risks. The permittees included Microbial Source Tracking (MST) methods in their data collection efforts to target the source of the fecal bacteria through genetic markers in the bacteria. Host-associated genetic markers in gut bacteria have been identified based on the theory that the physiology in the gut of the host animal (e.g., diet, temperature, antibiotic treatment, etc.) is unique from one species of animal to another. These documented gut conditions and associated genetic markers of gut bacteria allow LuminUltra Technologies (formerly Source Molecular), an accredited MST laboratory, to use replicable methods to identify common hosts of gut bacteria and sources of fecal contamination.

The high cost (over 15 times the cost of a traditional bacteria sample) of MST reduces the feasibility of the permittees using this method for every bacteria sample. To capitalize on MST efforts, the permittees have conducted concurrent sampling for wet weather events where duplicate MST samples were collected along with standard Enterococcus bacteria samples. Enterococcus bacteria samples were analyzed first and then, based on those bacteria concentration results and collaborative discussion, MST analysis can be conducted on the duplicate MST sample for select samples of interest. This ensured that the more expensive MST analysis was only performed on select samples that appeared likely to provide insight about fecal bacteria sources in James Island Creek.

The permittees budgeted to conduct MST analysis for up to four total samples over the course of one year of sampling, so samples must be selected carefully. One sample was analyzed previously in Summer 2021. In the Fall 2021 season, MST duplicate samples for the wet weather event on 12/8/21 were sent to the lab to be processed and held for potential MST analysis. However, in the interest of conserving the remaining three budgeted MST analyses, they have not yet been analyzed. These samples may be analyzed at a future date as budget and stakeholder interest dictate. All MST analysis results since August 2021 are shown in **Table 2**.

Table 2: Microbial Source Tracking (MST) Results for Selected Samples

Sample Date & Time	Site Name	Total Rainfall (inches)	Enterococcus Result (MPN/100ml)	MST Result Interpretation (# DNA Copies/100ml)			
				Dog	Bird	Human	Ruminant
9/21/2021 10:49	Riley Road	2.39	4110	Low (DNQ*)	Moderate (1.23E+05)	Low (DNQ*)	Absent (Not Detected)

*DNQ = "Did Not Quantify," presence of DNA markers was detected but below the minimum quantification level.

Total Rainfall is included in **Table 2** as a general indicator of size of the rainfall event. Other parameters such as rainfall distribution and intensity, tidal characteristics, and time of sampling relative to rainfall are also important to understand the sampling conditions associated with each MST analysis. Appendix C contains grab sampling figures showing these parameters for each event that included MST analysis, along with visual indication of which samples were analyzed.

The sample chosen from the September 2021 sampling effort was from the middle of the sampling period at Riley Road. It was collected during a high falling tide, the second falling tide that occurred during this extended period of rainfall. The Enterococcus concentration was relatively high, being of the "thousands" order of magnitude. As indicated in **Table 2**, the MST analysis indicated a stronger presence of Bird than the other sources. Dog and Human were present in the sample, but below the minimum quantification limit (DNQ). Ruminant (e.g., deer, goats, sheep) was not present in the sample. More MST data will be collected to add to observations about bacteria sources for other storms during different combinations of conditions and at other times of year.

MST analysis was also conducted by LuminUltra for two sampling efforts conducted by Charleston Water Systems (not associated with the permittees' efforts). In an effort to capitalize on all data collection efforts in James Island Creek and increase the understanding of the watershed, Woolpert reviewed the results of these sampling efforts for inclusion in this memo. Samples were collected by Charleston Water Systems at three locations in the watershed on 3/4/2021 and 5/18/2021 and submitted to LuminUltra for MST analysis of Human, Dog, and Bird DNA markers. The results are summarized as follows with reference to historic rainfall data from the Ravenel Bridge Rain Gauge provided for context.

- 3/4/2021 samples were collected the day after 1.41" of rainfall occurred and indicated Low (but quantifiable) results for Human and Bird, and Low (DNQ) results for Dog at all three watershed locations.
- 5/18/2021 samples were collected under dry conditions (last rainfall was 1.06" on 5/12/2021) and indicated Low (but quantifiable), Low (DNQ), and No Detect results for Human, and a mix of Low (DNQ) and No Detect results for both Bird and Dog among the different watershed locations.

Regarding these two Charleston Water Systems sampling events, during wet weather sampling on 3/4/2021, the source results were generally consistent at different locations throughout the watershed. In comparison, the dry weather sample results on 5/18/2021 were more variable at different locations in the watershed.

As noted earlier, the trends and comparisons discussed in this memo are observations based on the limited dataset. This data is intended to provide the permittees with a preliminary understanding of the James Island Creek watershed and potential impacts of stormwater runoff on bacteria concentrations. The permittees intend to continue both wet weather and dry weather grab sampling, with MST analysis of up to four total select samples, to supplement these initial observations and continue to collect information about the dynamics of James Island Creek.

Appendix A: Grab Sampling Results and Associated Field Conditions

Date	Time	Sampling Location (Riley Rd/Harbor View Bridge)	Enterococcus Result (MPN/100 ML)	Tidal Conditions (High/Mid/Low, Rising/Falling)	Type of Sample (Wet/Dry)	Weather Conditions
8/3/2021	9:36	Riley Road	320	Low/Falling	Wet	Raining Total Rainfall = 0.20" Avg Temp = 78°F
8/3/2021	10:07	Harbor View Bridge	90	Low/Falling	Wet	
8/3/2021	10:33	Riley Road	10	Low/Rising	Wet	
8/3/2021	11:02	Harbor View Bridge	60	Low/Rising	Wet	
8/3/2021	12:15	Riley Road	380	Mid/Rising	Wet	
8/3/2021	12:30	Harbor View Bridge	50	Mid/Rising	Wet	
8/3/2021	13:56	Riley Road	90	High/Rising	Wet	
8/3/2021	14:20	Harbor View Bridge	20	High/Rising	Wet	
8/31/2021	9:29	Riley Road	1110	Low/Rising	Dry	Partly Cloudy 9 Days Since Rain Avg Temp = 85°F
8/31/2021	9:52	Harbor View Bridge	<10	Low/Rising	Dry	
8/31/2021	10:45	Riley Road	580	Mid/Rising	Dry	
8/31/2021	11:04	Harbor View Bridge	10	Mid/Rising	Dry	
8/31/2021	11:44	Riley Road	470	High/Rising	Dry	
8/31/2021	12:03	Harbor View Bridge	<10	High/Rising	Dry	
8/31/2021	13:30	Riley Road	250	High/Slack	Dry	
8/31/2021	13:53	Harbor View Bridge	<10	High/Slack	Dry	
9/21/2021	9:30	Riley Road	640	High/Rising	Wet	Rainy Total Rainfall = 2.39" Avg Temp = 76°F
9/21/2021	9:50	Harbor View Bridge	120	High/Rising	Wet	
9/21/2021	10:49	Riley Road	4110	High/Falling	Wet	
9/21/2021	11:15	Harbor View Bridge	290	High/Falling	Wet	
9/21/2021	12:13	Riley Road	2760	Mid-High/Falling	Wet	
9/21/2021	12:30	Harbor View Bridge	620	Mid-High/Falling	Wet	
9/21/2021	13:15	Riley Road	8160	Mid-Low/Fallng	Wet	
9/21/2021	13:35	Harbor View Bridge	810	Mid-Low/Fallng	Wet	

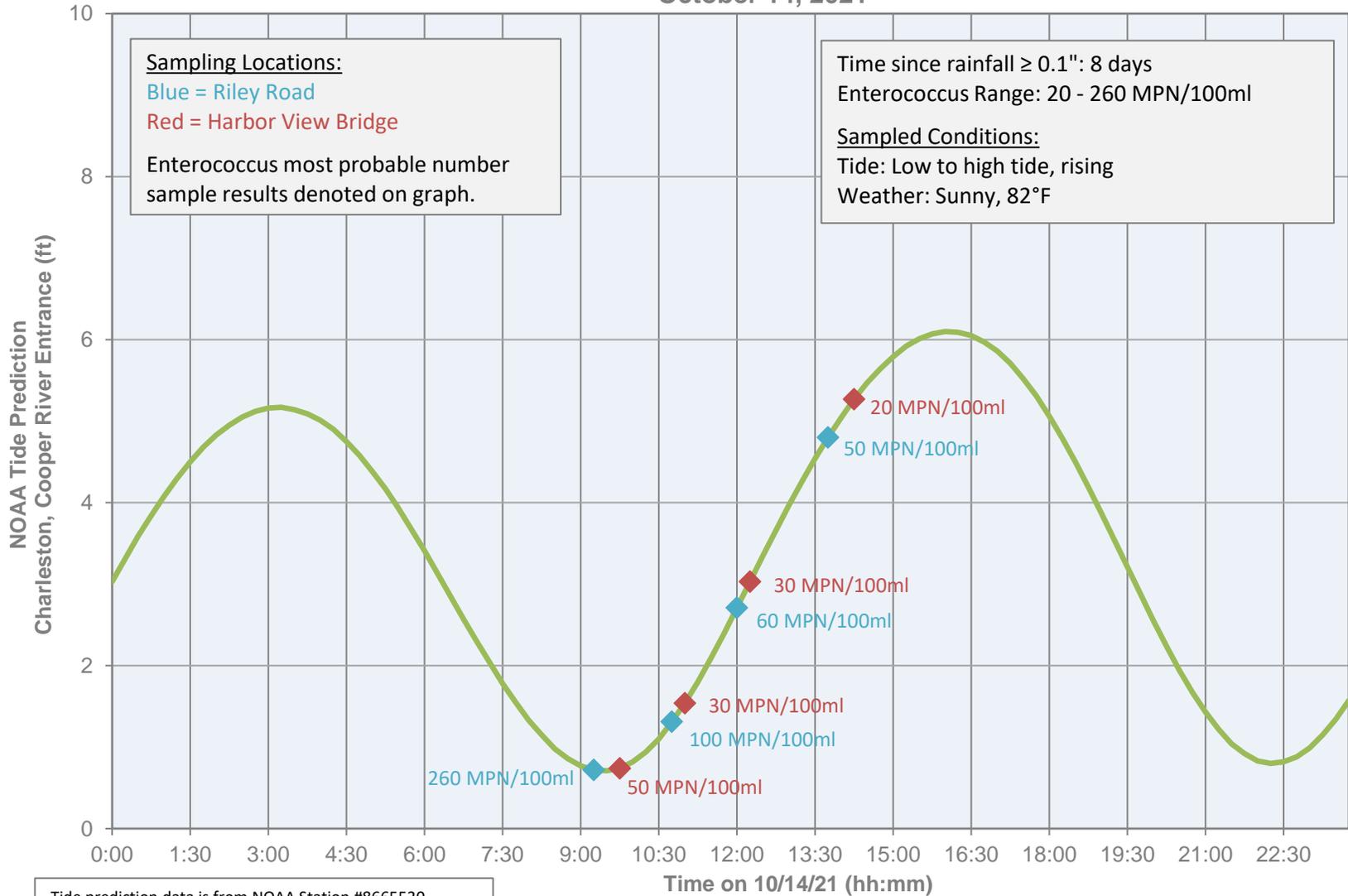
Date	Time	Sampling Location (Riley Rd/Harbor View Bridge)	Enterococcus Result (MPN/100 ML)	Tidal Conditions (High/Mid/Low, Rising/Falling)	Type of Sample (Wet/Dry)	Weather Conditions
10/14/2021	9:22	Riley Road	260	Low/Slack	Dry	Sunny 8 Days Since Rain Avg Temp = 82°F
10/14/2021	9:45	Harbor View Bridge	50	Low/Rising	Dry	
10/14/2021	10:40	Riley Road	100	Mid/Rising	Dry	
10/14/2021	11:00	Harbor View Bridge	30	Mid/Rising	Dry	
10/14/2021	12:07	Riley Road	60	Mid/Rising	Dry	
10/14/2021	12:22	Harbor View Bridge	30	Mid/Rising	Dry	
10/14/2021	13:48	Riley Road	50	High/Rising	Dry	
10/14/2021	14:08	Harbor View Bridge	20	High/Rising	Dry	
11/24/2021	9:48	Harbor View Bridge	20	High/Rising	Dry	Sunny 13 Days Since Rain Avg Temp = 52°F
11/24/2021	10:05	Riley Road	40	High/Rising	Dry	
11/24/2021	11:12	Harbor View Bridge	<10	High/Slack	Dry	
11/24/2021	11:35	Riley Road	75	High/Slack	Dry	
11/24/2021	12:35	Harbor View Bridge	10	High/Falling	Dry	
11/24/2021	12:46	Riley Road	197	High/Falling	Dry	
11/24/2021	13:50	Harbor View Bridge	10	Mid/Falling	Dry	
11/24/2021	14:02	Riley Road	17330	Mid/Falling	Dry	Rainy Total Rainfall = 0.96" Avg Temp = 63°F
12/8/2021	9:36	Harbor View Bridge	10	High/Rising	Wet	
12/8/2021	9:48	Riley Road	530	High/Rising	Wet	
12/8/2021	11:28	Harbor View Bridge	<10	High/Slack	Wet	
12/8/2021	11:40	Riley Road	170	High/Slack	Wet	
12/8/2021	12:45	Harbor View Bridge	10	High/Falling	Wet	
12/8/2021	12:57	Riley Road	860	High/Falling	Wet	
12/8/2021	13:52	Harbor View Bridge	150	Mid/Falling	Wet	
12/8/2021	14:05	Riley Road	1380	Mid/Falling	Wet	

Date	Time	Sampling Location (Riley Rd/Harbor View Bridge/Folly Road Bridge)	Enterococcus Result (MPN/100 ML)	Tidal Conditions (High/Mid/Low, Rising/Falling)	Type of Sample (Wet/Dry)	Weather Conditions
12/29/2021	9:03	Riley Road	300	Low/Falling	Dry	Partly Cloudy 8 Days Since Rain Avg Temp = 74°F
12/29/2021	9:20	Folly Road Bridge	310	Low/Falling	Dry	
12/29/2021	9:37	Harbor View Bridge	140	Low/Falling	Dry	
12/29/2021	11:04	Riley Road	220	Low/Rising	Dry	
12/29/2021	11:21	Folly Road Bridge	140	Low/Rising	Dry	
12/29/2021	11:38	Harbor View Bridge	90	Low/Rising	Dry	
12/29/2021	12:57	Riley Road	150	Mid/Rising	Dry	
12/29/2021	13:08	Folly Road Bridge	220	Mid/Rising	Dry	
12/29/2021	13:26	Harbor View Bridge	10	Mid/Rising	Dry	

Appendix B: Figures of Individual Storm Grab Sampling Results

Charleston County James Island Creek Dry Weather Sampling

October 14, 2021



Sampling Locations:
 Blue = Riley Road
 Red = Harbor View Bridge

Enterococcus most probable number sample results denoted on graph.

Time since rainfall ≥ 0.1 " : 8 days
 Enterococcus Range: 20 - 260 MPN/100ml

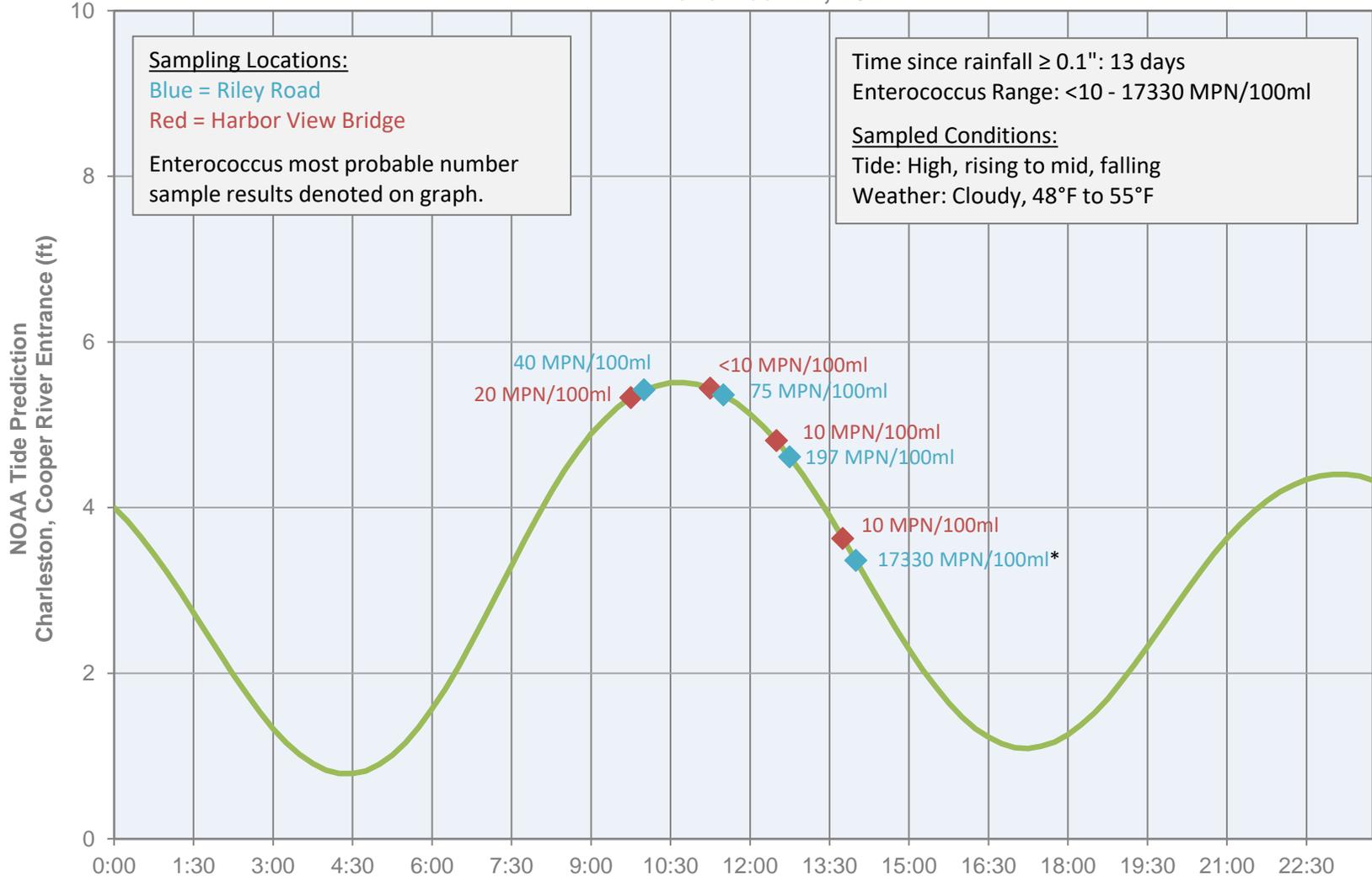
Sampled Conditions:
 Tide: Low to high tide, rising
 Weather: Sunny, 82°F

Tide prediction data is from NOAA Station #8665530 "Charleston, Cooper River Entrance, SC", approximately 2.5 miles northeast of the Harbor View Bridge sampling site.

— Stage (ft) ◆ Sample

Charleston County James Island Creek Dry Weather Sampling

November 24, 2021



Sampling Locations:
 Blue = Riley Road
 Red = Harbor View Bridge

Enterococcus most probable number sample results denoted on graph.

Time since rainfall ≥ 0.1 " : 13 days
 Enterococcus Range: <10 - 17330 MPN/100ml

Sampled Conditions:
 Tide: High, rising to mid, falling
 Weather: Cloudy, 48°F to 55°F

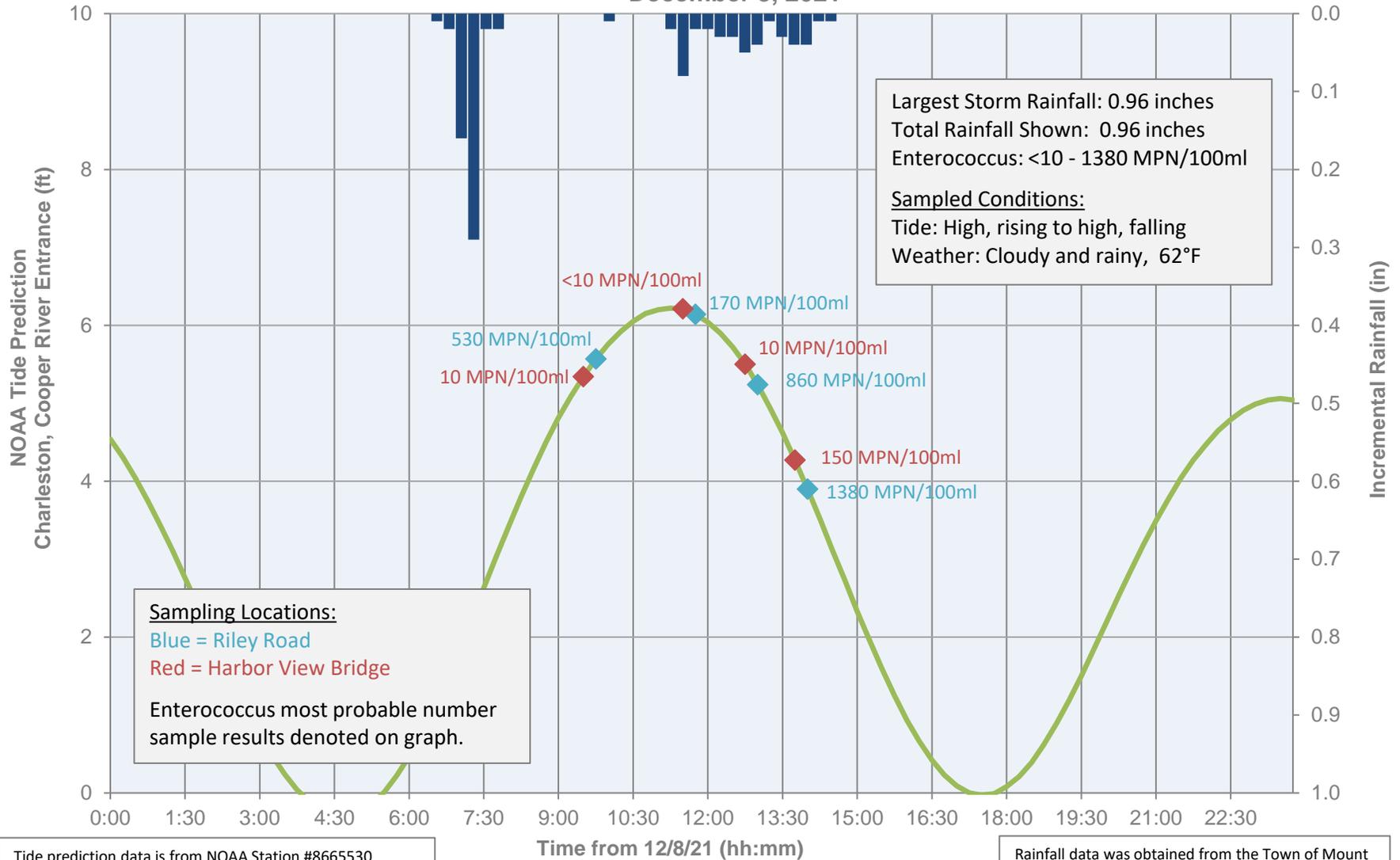
Tide prediction data is from NOAA Station #8665530 "Charleston, Cooper River Entrance, SC", approximately 2.5 miles northeast of the Harbor View Bridge sampling site.

— Stage (ft) ◆ Sample

*Outlier, not typical of James Island Creek conditions. Trash dumping at sampling location appeared to influence result.

Charleston County James Island Creek Wet Weather Sampling

December 8, 2021



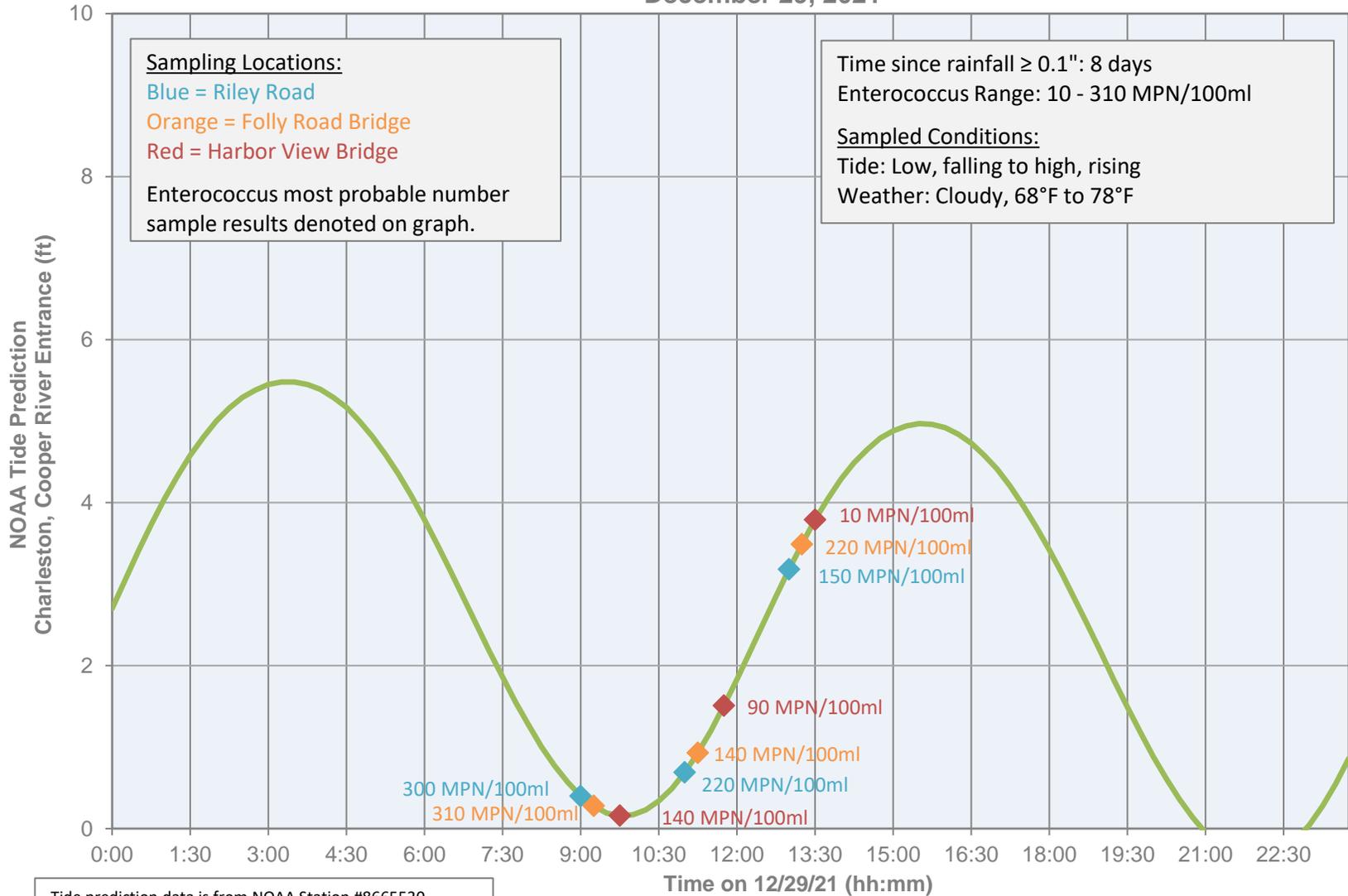
Tide prediction data is from NOAA Station #8665530 "Charleston, Cooper River Entrance, SC", approximately 2.5 miles northeast of the Harbor View Bridge sampling site.

■ 15 minute Rainfall (in)
 — Stage (ft)
 ◆ Sample

Rainfall data was obtained from the Town of Mount Pleasant's Ravenel Bridge rain gauge, approximately 4.5 miles northeast of Harbor View Bridge.

Charleston County James Island Creek Dry Weather Sampling

December 29, 2021



Sampling Locations:
 Blue = Riley Road
 Orange = Folly Road Bridge
 Red = Harbor View Bridge
 Enterococcus most probable number sample results denoted on graph.

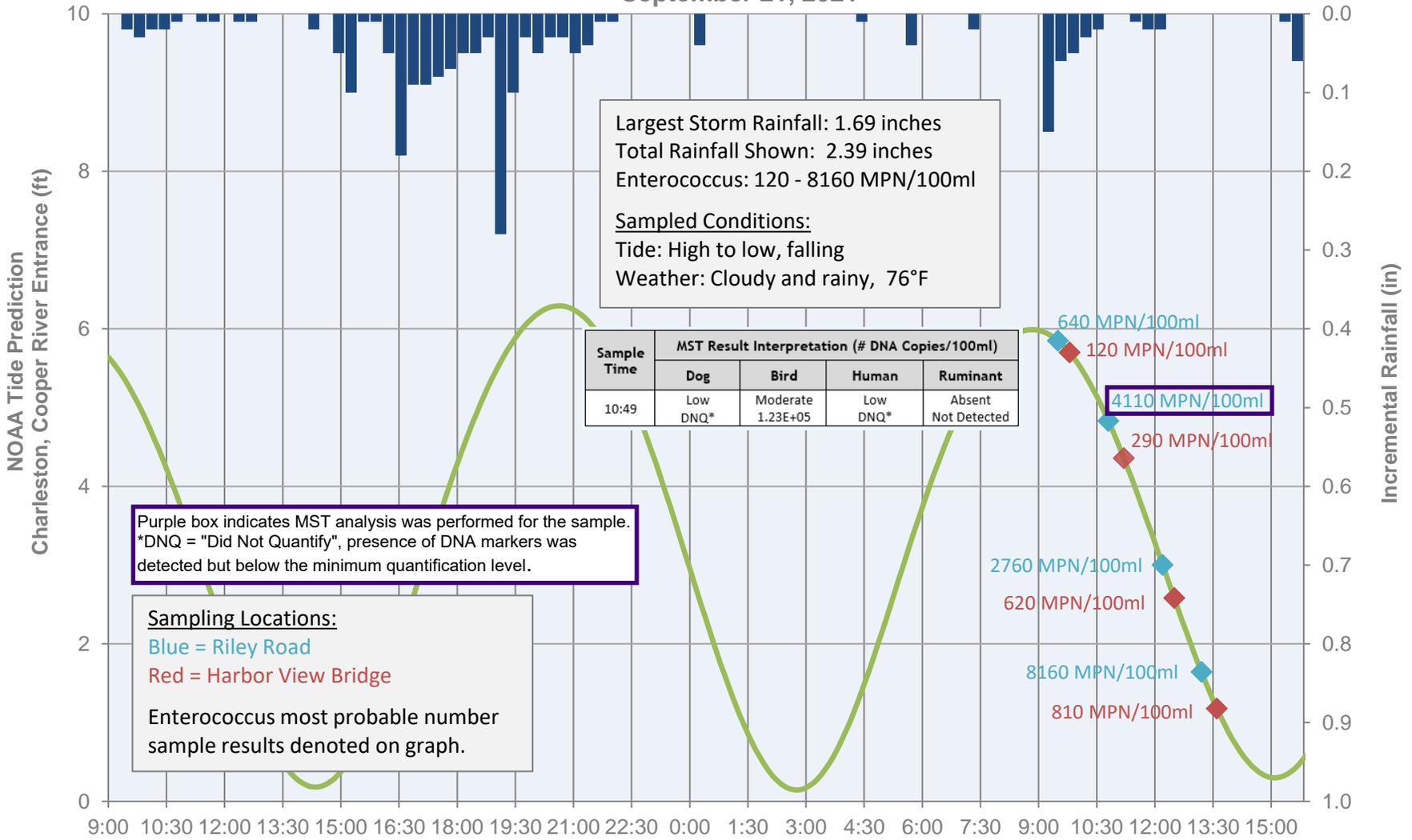
Time since rainfall ≥ 0.1 " : 8 days
 Enterococcus Range: 10 - 310 MPN/100ml
Sampled Conditions:
 Tide: Low, falling to high, rising
 Weather: Cloudy, 68°F to 78°F

Tide prediction data is from NOAA Station #8665530 "Charleston, Cooper River Entrance, SC", approximately 2.5 miles northeast of the Harbor View Bridge sampling site.

— Stage (ft) ◆ Sample

Appendix C: Microbial Source Tracking Results Graphs

Charleston County James Island Creek Wet Weather Sampling September 21, 2021



Tide prediction data is from NOAA Station #8665530 "Charleston, Cooper River Entrance, SC", approximately 2.5 miles northeast of the Harbor View Bridge sampling site.

Time from 9/20/21 to 09/21/21 (hh:mm)

■ 15 minute Rainfall (in)
 — Stage (ft)
 ◆ Sample

Rainfall data was obtained from the Town of Mount Pleasant's Ravenel Bridge rain gauge, approximately 4.5 miles northeast of Harbor View Bridge.