Final

Total Maximum Daily Load (TMDL) for Affonee Creek

Assessment Unit ID # AL03150202-0505-100

Bibb County

Pathogens (*E. coli*)

Alabama Department of Environmental Management
Water Quality Branch
Water Division
July 2024

Figure 1-1 Affonee Creek Watershed

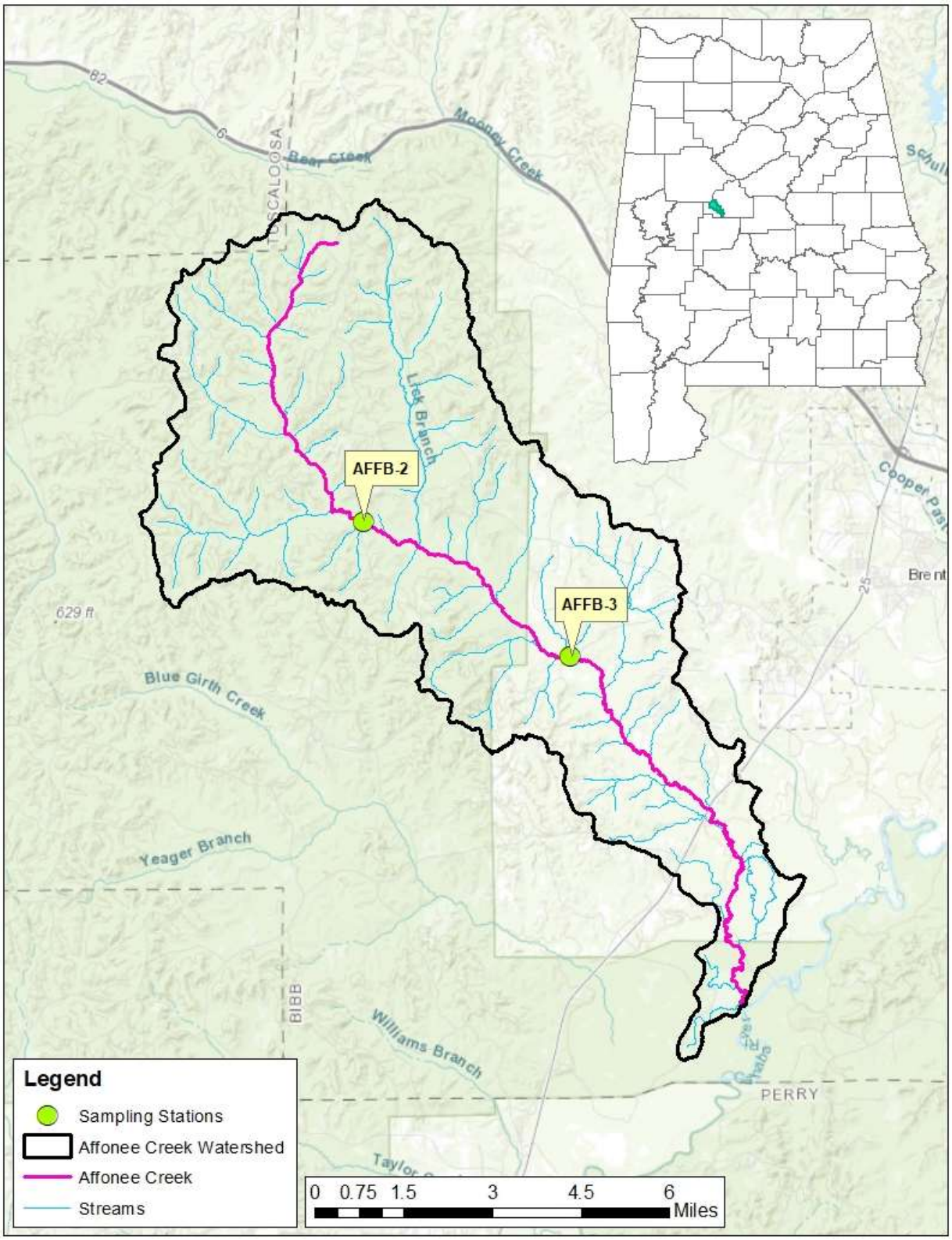


Table of Contents

List of Figures

List of Tables

1.0 Executive Summary

Section 303(d) of the Clean Water Act and EPA's Water Quality Planning and Management Regulations (40 CFR Part 130) require states to identify waterbodies which are not meeting their designated uses and to determine the total maximum daily load (TMDL) for pollutants causing the use impairment. A TMDL is the sum of individual waste load allocations (WLAs) for point sources, load allocations (LAs) for nonpoint sources including natural background levels, and a margin of safety (MOS).

Affonee Creek, part of the Cahaba River Basin, is currently included on Alabama's §303(d) list for pathogens (*E. coli*) from its source to the Cahaba River. Affonee Creek's headwaters begin southeast of Duncanville, Alabama near the western border of Bibb County, and it flows southeast into the Cahaba River. The total impaired length of Affonee Creek is 18.51 miles, and the total drainage area of the Affonee Creek watershed is 41.28 square miles. Affonee Creek has a use classification of Swimming and Other Whole Body Water-Contact Sports.

Affonee Creek was first included on the §303(d) list for pathogens in 2018 based on ADEM monitoring data collected in 2015 at station AFFB-3. Affonee Creek has subsequently been listed for pathogens on the 2020 and 2022 §303(d) lists of impaired waterbodies.

In 2020, 2021, and 2023, sampling studies were performed by ADEM to further assess the water quality of the impaired stream. For the purposes of this TMDL, the 2020, 2021, and 2023 data will be used to assess the water quality of Affonee Creek because it provides the best picture of the current water quality of the stream. The 2024 edition of *Alabama's Water Quality Assessment and Listing Methodology*, prepared by ADEM, provides the rationale for the Department to use the most recent data to prepare a TMDL for an impaired waterbody. The 2020, 2021, and 2023 bacterial data is listed in Appendix 7.2, Tables 7-2 and 7-3 for reference.

ADEM collected 23 *E. coli* samples and conducted two geometric mean studies on Affonee Creek during 2020, 2021, and 2023. According to the data, Affonee Creek was not meeting the pathogen criteria applicable to its use classification of Swimming and Other Whole Body Water-Contact Sports. Therefore, this TMDL has been developed for pathogens (*E. coli*) for the listed reach.

A mass balance approach was used for calculating the pathogen TMDL for Affonee Creek. The mass balance approach utilizes the conservation of mass principle. The TMDL was calculated using the single sample or geometric mean sample exceedance event which resulted in the highest percent reduction. Existing loads were calculated by multiplying the *E. coli* concentrations times the respective instream flows and a conversion factor. In the same manner as existing loads were calculated, allowable loads were calculated for the single sample *E. coli* target of 211.5 colonies/100 ml (235 colonies/100 ml – 10% Margin of Safety) and geometric mean *E. coli* target of 113.4 colonies/100 ml (126 colonies/100 ml – 10% Margin of Safety). In this case, it was determined that the highest percent reduction was calculated from a single sample maximum *E. coli* exceedance at station AFFB-3 (April 3, 2023) with a value of 2419.6 colonies/100 ml. This violation calls for a reduction of 91%.

Table 1-1 is a summary of the estimated existing load, allowable load, and percent reduction for the geometric mean and single sample criteria. Table 1-2 provides the details of the TMDL along with the corresponding reductions for Affonee Creek, which are protective of the *E. coli* water quality criteria year-round.

Table 1-1 *E. coli* Loads and Required Reductions for Affonee Creek

Source	Existing Load (col/day)	Allowable Load (col/day)	Required Reduction (col/day)	% Reduction
Single Sample Load	1.97E+12	1.72E+11	1.80E+12	91%
Geometric Mean Load	5.26E+10	8.28E+09	4.43E+10	84%

Table 1-2 *E. coli* TMDL for Affonee Creek

TMDL[a]	Margin of Safety (MOS)	Waste Load Allocation (WLA)[e]			Load Allocation (LA)	
		WWTPs[b]	MS4s[c]	Leaking Collection Systems[d]		
(col/day)	(col/day)	(col/day)	(% reduction)	(col/day)	(col/day)	(% reduction)
1.91E+11	1.91E+10	NA	NA	0	1.72E+11	91%

Note: NA = not applicable

a. TMDL was established using the single sample criterion of 235 colonies/100ml.

b. Future WWTPs must meet the applicable instream water quality criteria for pathogens at the point of discharge.

c. Future MS4 areas would be required to demonstrate consistency with the assumptions and requirements of this TMDL.

d. The objective for leaking collection systems is a WLA of zero. It is recognized, however, that a WLA of 0 colonies/day may not be practical. For these sources, the WLA is interpreted to mean a reduction in *E. coli* loading to the maximum extent practicable, consistent with the requirement that these sources not contribute to a violation of the water quality criteria for *E. coli*.

e. There are no CAFOs in the Affonee Creek watershed. Future CAFOs will be assigned a wasteload allocation (WLA) of zero.

Compliance with the terms and conditions of existing and future NPDES permits will effectively implement the WLA and demonstrate consistency with the assumptions and requirements of the TMDL. Required load reductions in the LA portion of this TMDL can be implemented through voluntary measures and may be eligible for CWA §319 grants.

The Department recognizes that adaptive implementation of this TMDL will be needed to achieve applicable water quality criteria and we are committed to targeting the load reductions to improve water quality in the Affonee Creek watershed. As additional data and/or information becomes available, it may become necessary to revise and/or modify the TMDL accordingly.

2.0 Basis for §303(d) Listing

2.1 Introduction

Section 303(d) of the Clean Water Act and EPA's Water Quality Planning and Management Regulations (40 CFR Part 130) require states to identify waterbodies which are not meeting their designated uses and to determine the total maximum daily load (TMDL) for pollutants causing use impairment. The TMDL process establishes the allowable loading of pollutants for a waterbody based on the relationship between pollution sources and instream water quality conditions, so that states can establish water-quality based controls to reduce pollution and restore and maintain the quality of their water resources (USEPA, 1991).

The State of Alabama has identified the 18.51 miles of Affonee Creek as impaired for pathogens. The §303(d) listing for pathogens was originally reported on Alabama's 2018 List of Impaired Waters based on 2015 ADEM monitoring data from station AFFB-3 and was subsequently included on the 2020 and 2022 lists. The source of the impairment on the 2022 §303(d) list is listed as pasture grazing.

2.2 Problem Definition

Waterbody Impaired:	Affonee Creek – from the Cahaba River to its source
Impaired Reach Length:	18.51 miles
Impaired Drainage Area:	41.28 square miles
Water Quality Standard Violation:	Pathogens (Single Sample, Geometric Mean)
Pollutant of Concern:	Pathogens (*E. coli*)
Water Use Classification:	Swimming and Other Whole Body Water-Contact Sports (S)

Usage Related to Classification:
The impaired stream segment is classified as Swimming and Other Whole Body Water-Contact Sports (S).

Usage of waters in the Swimming and Other Whole Body Water-Contact Sports classification is described in ADEM Admin. Code r. 335-6-10-.09(3)(a) and (b).

(a) Best usage of waters: swimming and other whole body water-contact sports.

(b) Conditions related to best usage: the waters, under proper sanitary supervision by the controlling health authorities, will meet accepted standards of water quality for outdoor swimming areas and will be considered satisfactory for swimming and other whole body water-contact sports. The quality of waters will also be suitable for the propagation of fish, wildlife and aquatic

life. The quality of salt waters and estuarine waters to which this classification is assigned will be suitable for the propagation and harvesting of shrimp and crabs.

E. coli Criteria:

Criteria for acceptable bacteria levels for the Swimming and Other Whole Body Water-Contact Sports use classification are described in ADEM Admin. Code r. 335-6-10-.09(3)(c)6(i), (ii) and (iii) as follows:

6. Bacteria:

(i) Waters in the immediate vicinity of discharges of sewage or other wastes likely to contain bacteria harmful to humans, regardless of the degree of treatment afforded these wastes, are not acceptable for swimming or other whole body water-contact sports.

(ii) In all other areas, the bacterial quality of water is acceptable when a sanitary survey by the controlling health authorities reveals no source of dangerous pollution and when the geometric mean E. coli organism density does not exceed 126 colonies/100 ml nor exceed a maximum of 235 colonies/100 ml in any sample in non-coastal waters. In coastal waters, bacteria of the enterococci group shall not exceed a geometric mean of 35 colonies/100 ml nor exceed a maximum of 104 colonies/100 ml in any sample. The geometric mean shall be calculated from no less than five samples collected at a given station over a 30-day period at intervals not less than 24 hours. When the geometric mean bacterial organism density exceeds these levels, the bacterial water quality shall be considered acceptable only if a second detailed sanitary survey and evaluation discloses no significant public health risk in the use of the waters.

(iii) The policy of nondegradation of high quality waters shall be stringently applied to bacterial quality of recreational waters.

Criteria Exceeded:

Affonee Creek was first included on the §303(d) list for pathogens in 2018 based on ADEM's 2015 *E. coli* data from station AFFB-3. Of the eight *E. coli* samples collected at station AFFB-3 in 2015, seven violated the applicable single sample maximum criterion of 235 colonies/100 ml. The listing data can be found in Appendix 7.2, Table 7-1.

3.0 Technical Basis for TMDL Development

3.1 Water Quality Target Identification

For the purpose of this TMDL, a single sample *E. coli* target of 211.5 colonies/100 ml will be used. This target was derived by using a 10% explicit margin of safety from the single sample maximum criterion of 235 colonies/100 ml. This target is considered protective of water quality standards and should not allow the single sample maximum criterion to be exceeded. In addition, a geometric mean target of 113.4 colonies/100 ml will be used for a series of five samples taken at least 24 hours apart over the course of 30 days. This geometric mean target was also derived by using a 10% explicit margin of safety from the geometric mean criterion of 126 colonies/100 ml. This

target is considered protective of water quality standards and should not allow the geometric mean criterion to be exceeded.

3.2 Source Assessment

3.2.1 Point Sources in the Affonee Creek Watershed

A point source can be defined as a discernable, confined, and discrete conveyance from which pollutants are or may be discharged to surface waters. Point source contributions can typically be attributed to municipal wastewater facilities, illicit discharges, and leaking sewer systems in urban areas. Municipal wastewater treatment facilities are permitted through the National Pollutant Discharge Elimination System (NPDES) process administered by ADEM. In urban settings, sewer lines typically run parallel to streams in the floodplain. If a leaking sewer line is present, high concentrations of bacteria can flow into the stream or leach into the groundwater. Illicit discharges are found at facilities that are discharging bacteria when not permitted, or when the pathogens criterion established in the issued NPDES permit is not being upheld.

There are currently no NPDES-regulated point sources in the Affonee Creek watershed. In addition, the Affonee Creek watershed does not presently qualify as a municipal separate storm sewer system (MS4) area.

There are currently no Animal Feeding Operation/Concentrated Animal Feeding Operation (AFO/CAFO) facilities located within the Affonee Creek watershed. The ADEM AFO/CAFO rules prohibit discharges of pollutants from the facilities and their associated waste land application activities. As a result, future AFOs/CAFOs will receive a waste load allocation of zero.

Any future NPDES-regulated discharger that is considered by the Department to be a pathogen source will be required to demonstrate consistency with the assumptions and requirements of this TMDL.

3.2.2 Nonpoint Sources in the Affonee Creek Watershed

Nonpoint sources of *E. coli* bacteria do not have a defined discharge point, but rather occur over the entire length of a stream or waterbody. On the land surface, *E. coli* bacteria can accumulate over time in the soil and then are washed off during rain events. As the runoff transports the sediment over the land surface, more *E. coli* bacteria are collected and carried to the stream or waterbody. Therefore, there is some net loading of *E. coli* bacteria into the stream as dictated by the watershed hydrology.

Nonpoint sources are the primary source of *E. coli* bacteria in the Affonee Creek watershed. Land use in this watershed is primarily forested/natural (90.19%), along with some agriculture (5.20%) and developed land (4.37%).

Agricultural land can be a source of *E. coli* bacteria. Runoff from pastures, animal feeding areas, improper land application of animal wastes, and animals with direct access to streams are all mechanisms that can contribute *E. coli* bacteria to waterbodies. To account for the potential

influence from animals with direct access to stream reaches in the watershed, *E. coli* loads can be calculated as a direct source into the stream.

E. coli bacteria can also originate from forested areas due to the presence of wild animals such as deer, raccoons, turkey, waterfowl, etc. Wildlife deposit feces onto land surfaces where it can be transported during rainfall events to nearby streams. Control of these sources is usually limited to land management BMPs and may be impracticable in most cases. As a result, forested areas are not specifically targeted in this TMDL.

E. coli loading from urban areas is potentially attributable to multiple sources including storm water runoff, unpermitted discharges of wastewater, runoff from improper disposal of waste materials, failing septic tanks, and domestic animals. Septic systems may be direct or indirect sources of bacterial pollution via ground and surface waters. Onsite septic systems have the potential to deliver *E. coli* bacteria to surface waters due to system failure and malfunction.

3.3 Land Use Assessment

Land use for the Affonee Creek watershed was determined using ArcMap with land use datasets derived from the 2021 National Land Cover Dataset (NLCD). Figure 3-1 and Table 3-1 display the land use areas for the Affonee Creek watershed.

The majority of the Affonee Creek watershed is forested/natural (90.19%). Other land uses include agriculture (5.20%) and developed land (4.37%). If not managed properly, agriculture can have significant nonpoint source impacts. Also, septic systems can be a main source of bacteria if not properly installed and maintained.

Figure 3-1 Land Use Map for the Affonee Creek Watershed

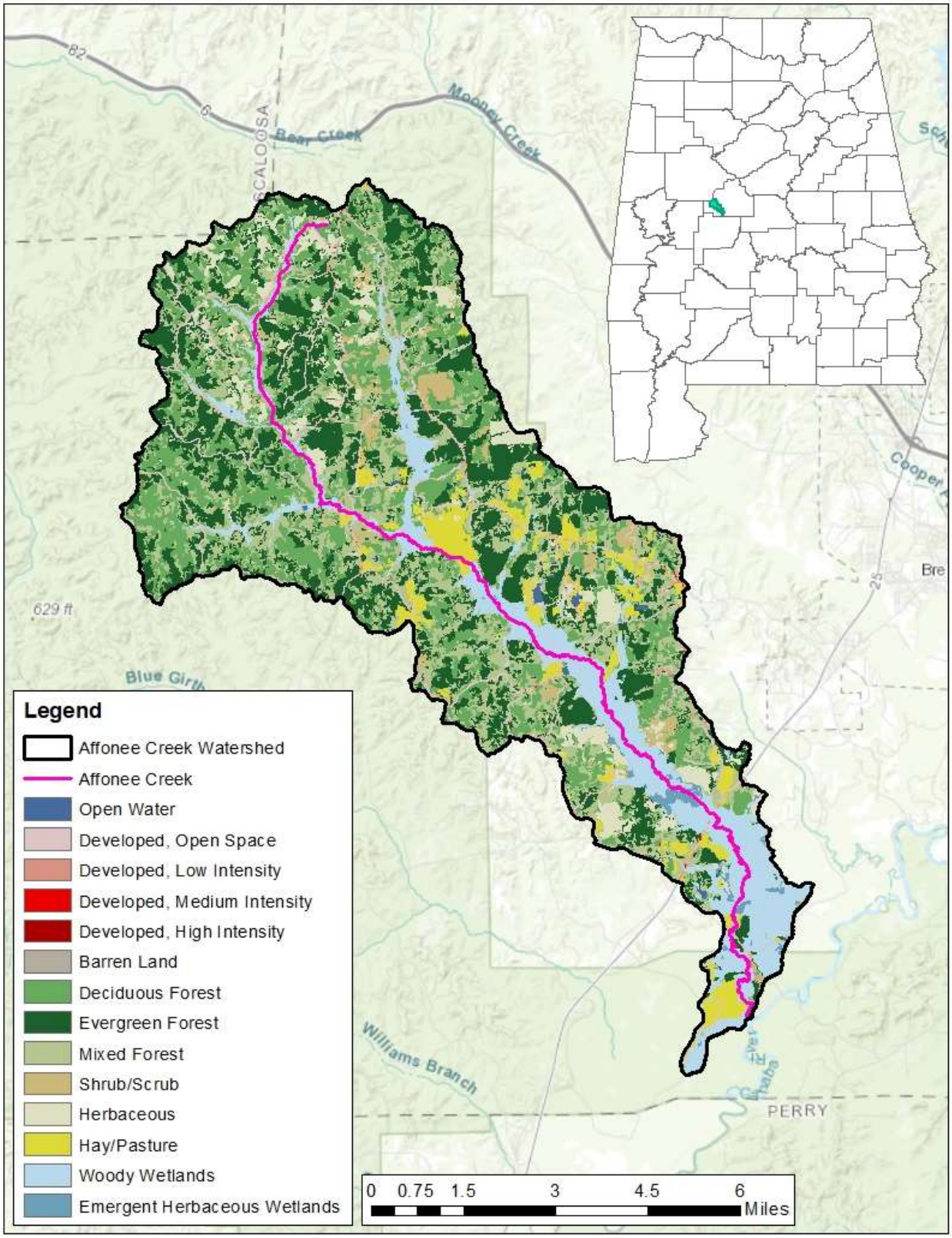
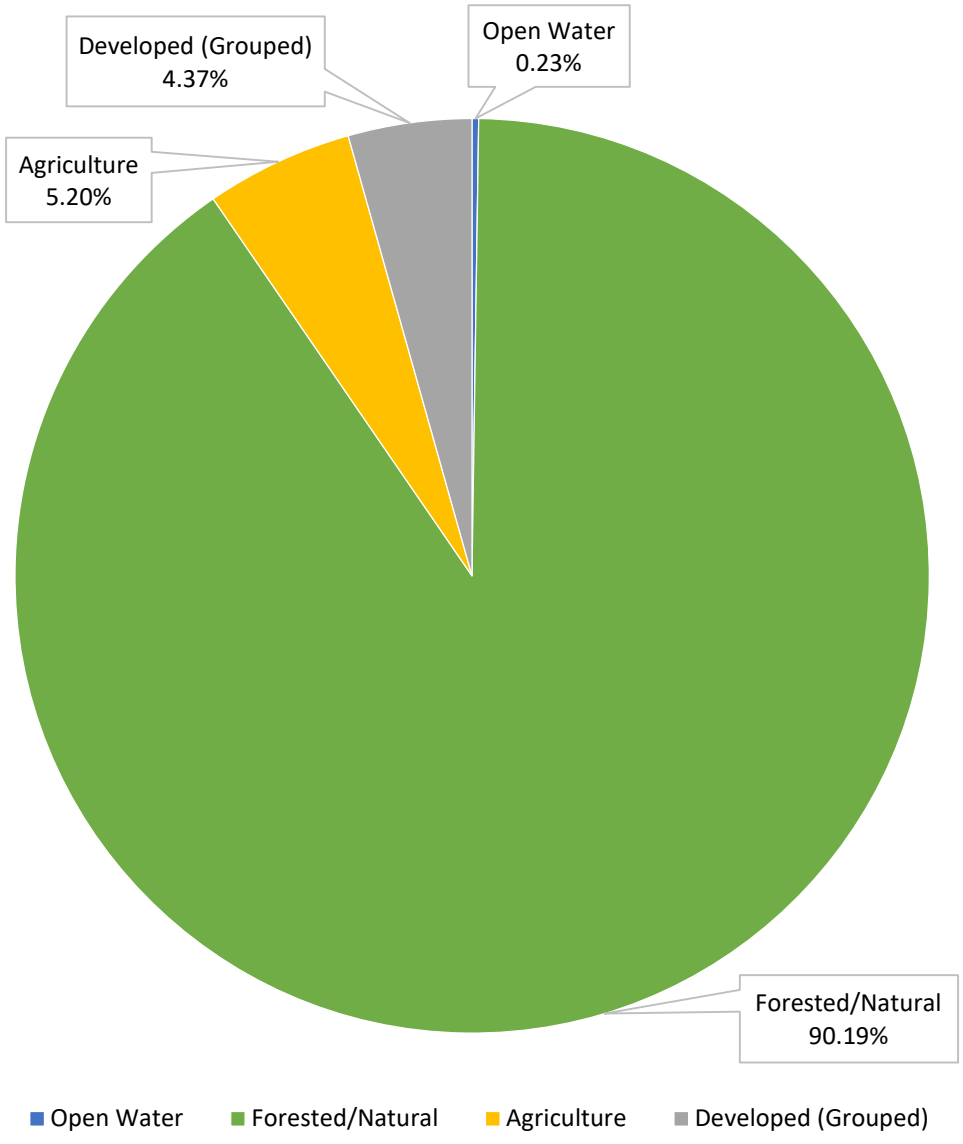


Table 3-1 Land Use Areas for the Affonee Creek Watershed

Cumulative Land Use	Square Miles (mi^2)	Acres	Percent
Open Water	0.10	60.95	0.23%
Forested/Natural	37.23	23827.44	90.19%
Agriculture	2.15	1375.07	5.20%
Developed (Grouped)	1.81	1155.75	4.37%
Total	**41.28**	**26419.20**	**100.00%**

Figure 3-2 Primary Land Uses in the Affonee Creek Watershed



3.4 Linkage Between Numeric Targets and Sources

The Affonee Creek watershed's main land use is forested/natural. Pollutant loadings from forested areas tend to be low due to their filtering capabilities and will be considered as background conditions. The most likely sources of pathogen loadings in Affonee Creek are from the agricultural land uses and failing septic systems. It is not considered a logical approach to calculate individual components for nonpoint source loadings. Hence, there will not be individual loads or reductions calculated for the various nonpoint sources. The loadings and reductions will only be calculated as a single total nonpoint source load and reduction.

3.5 Data Availability and Analysis

ADEM collected water quality data on Affonee Creek at station AFFB-3 in 2023 and at station AFFB-2 in 2020 and 2021. Figure 1-1 and Table 3-2 display the location and description, respectively, for the ADEM sampling stations. The 2020, 2021, 2023 data listed in Tables 3-3 and 3-4 will be evaluated for this TMDL. The January 2024 edition of *Alabama's Water Quality Assessment and Listing Methodology,* prepared by ADEM, provides the rationale for the Department to use the most recent data to prepare a TMDL for an impaired waterbody.

Table 3-2 Affonee Creek Sampling Station Descriptions

Station ID	Station Location	Latitude	Longitude
AFFB-2	Affonee Creek at CR-16	32.95031	-87.29941
AFFB-3	Affonee Creek at Big Barn Rd	32.92240	-87.24988

Two of the nine *E. coli* samples collected at station AFFB-2 during 2020-2021 exceeded the single sample maximum criterion of 235 colonies/100 ml for the Swimming and Other Whole Body Water-Contact Sports use classification. All fourteen *E. coli* samples collected at station AFFB-3 during 2023 exceeded the single sample maximum criterion. There were two sampling events that qualified for a geometric mean calculation at station AFFB-3 in 2023; both geometric means (7/18/2023 through 8/15/2023 and 9/6/2023 through 10/4/2023) exceeded the *E. coli* criterion of 126 colonies/100 ml. This data can be viewed in Tables 3-3 and 3-4 and in Appendix 7.2, Tables 7-2 and 7-3.

Table 3-3 2020-2021 *E. coli* Exceedances for the Affonee Creek Watershed at Station AFFB-2

Station AFFB-2			
Visit Date	***E. coli* Single Sample (col/100 ml)**	**Detect Criteria[a]**	**Flow (cfs)**
3/10/2020	99	H	59.4
1/5/2021	101.2		11.6
1/26/2021	1553.1		54.4
2/9/2021	38.4		12.0
2/23/2021	44.1		16.3
3/9/2021	45.7		10.8
3/23/2021	93.3		13.7
4/6/2021	98.7		17.7
4/27/2021	260.3		13.2

a. H denotes that the analytical holding times for analysis are exceeded.

Table 3-4 2023 *E. coli* Exceedances for the Affonee Creek Watershed at Station AFFB-3

Station AFFB-3				
Visit Date	***E. coli* Single Sample (col/100 ml)**	**Geometric Mean (col/100 ml)**	**Detect Criteria[a,b]**	**Flow (cfs)**
4/3/2023	2419.6		GH	33.22[c]
6/5/2023	248.1		H	5.1
7/18/2023	299.4	441.6		6.2
7/20/2023	387.3			8.9
7/25/2023	387.3			5.3
7/27/2023	461.1			2.9
8/1/2023	365.4			8.3
8/15/2023	980.4		H	13.52[c]
9/6/2023	547.5	720.5		3.3
9/18/2023	613.1			4.9
9/20/2023	517.2			3.2
9/25/2023	727.0			1.9
9/27/2023	920.8			2.5
10/4/2023	1203.3		H	2.1

a. G denotes that the amount of analyte is above an acceptable level for quantification and is likely higher than the reported value.
b. H denotes that the analytical holding times for analysis are exceeded.
c. Flow was not measured due to non-wadeable conditions. Flow was calculated using data from reference gauge USGS 02423630 for the same date the sample was collected at station AFFB-3.

3.6 Critical Conditions/Seasonal Variation

The *E. coli* single sample maximum criterion of 235 colonies/100 ml and geometric mean criterion of 126 colonies/100 ml for the Swimming and Other Whole Body Water-Contact Sports use classification are applicable year-round. The critical condition for this pathogen TMDL was taken to be the one with the highest *E. coli* single sample exceedance value. The highest single sample maximum concentration of 2419.6 colonies/100 ml was collected on April 3, 2023 at station AFFB-3. A flow of 33.22 cfs was calculated for station AFFB-3 during this sampling event. The use of the highest exceedance to calculate the TMDL is expected to be protective of water quality in Affonee Creek year-round.

3.7 Margin of Safety

There are two methods for incorporating a Margin of Safety (MOS) in the analysis: 1) by implicitly incorporating the MOS using conservative model assumptions to develop allocations, or 2) by explicitly specifying a portion of the TMDL as the MOS and using the remainder for allocations.

The MOS accounts for the uncertainty associated with the limited availability of *E. coli* data used in this analysis. An explicit MOS was applied to the TMDL by reducing the appropriate target criterion concentration by 10% and calculating a mass loading target with measured or estimated flow data. The single sample *E. coli* maximum value of 235 colonies/100 ml was reduced by 10% to 211.5 colonies/100 ml, while the geometric mean criterion of 126 colonies/100 ml was also reduced by 10% to 113.4 colonies/100 ml.

4.0 TMDL Development

4.1 Definition of a TMDL

A total maximum daily load (TMDL) is the sum of individual wasteload allocations (WLAs) for point sources, load allocations (LAs) for nonpoint sources including natural background levels, and a margin of safety (MOS). The margin of safety can be included either explicitly or implicitly and accounts for the uncertainty in the relationship between pollutant loads and the quality of the receiving waterbody. As discussed earlier, the MOS is explicit in this TMDL. A TMDL can be denoted by the equation:

$$TMDL = \Sigma\ WLAs + \Sigma\ LAs + MOS$$

The TMDL is the total amount of pollutant that can be assimilated by the receiving waterbody while achieving water quality standards under critical conditions.

For some pollutants, TMDLs are expressed on a mass loading basis (e.g., pounds per day). However, for pathogens, TMDL loads are typically expressed in terms of organism counts per day (colonies/day), in accordance with 40 CFR 130.2(i).

4.2 Load Calculations

A mass balance approach was used to calculate the pathogen TMDL for Affonee Creek. The mass balance approach utilizes the conservation of mass principle. Total mass loads can be calculated by multiplying the *E. coli* concentration times the instream flow times a conversion factor. Existing loads were calculated for the highest single sample exceedance and the highest geometric mean sample exceedance. In the same manner, allowable loads were calculated for both the single sample criterion of 235 colonies/100 ml and the geometric mean criterion of 126 colonies/100 ml. The TMDL was based on the violation that produced the highest percent reduction of *E. coli* loads necessary to achieve applicable water quality criteria, whether it be the single sample or geometric mean.

Existing Conditions

The **single sample** mass loading was calculated by multiplying the highest single sample exceedance concentration of 2419.6 colonies/100 ml times the calculated flow at the time the sample was taken. This concentration was measured at station AFFB-3 on April 3, 2023. The stream flow was calculated to be 33.22 cfs at the time of the violation. The product of these two values times the conversion factor gives the total mass loading (colonies per day) of *E. coli* to Affonee Creek.

$$\frac{33.22\ \text{ft}^3}{s} \times \frac{2419.6\ \text{colonies}}{100\ \text{ml}} \times \frac{24{,}465{,}755\ 100\ \text{ml} * s}{\text{ft}^3 * \text{day}} = \frac{1.97 \times 10^{12}\ \text{colonies}}{\text{day}}$$

The **geometric mean** mass loading was calculated by multiplying the highest geometric mean exceedance concentration of 720.5 colonies/100 ml times the average of the measured stream flows. This concentration was calculated based on measurements at station AFFB-3 between September 6, 2023 and October 4, 2023, which are shown in Table 3-4. The average stream flow was calculated to be 2.98 cfs. The product of these two values times the conversion factor gives the total mass loading (colonies per day) of *E. coli* to Affonee Creek under the geometric mean exceedance condition.

$$\frac{2.98\ \text{ft}^3}{s} \times \frac{720.5\ \text{colonies}}{100\ \text{ml}} \times \frac{24{,}465{,}755\ 100\ \text{ml} * s}{\text{ft}^3 * \text{day}} = \frac{5.26 \times 10^{10}\ \text{colonies}}{\text{day}}$$

Allowable Conditions

The **allowable load** to the watershed was calculated under the same physical conditions as discussed above for the single sample and geometric mean criteria. This was done by taking the product of the flow used for the violation event times the conversion factor times the allowable concentration.

For the **single sample** *E. coli* target concentration of 211.5 colonies/100 ml, the allowable *E. coli* loading is:

$$\frac{33.22\ \text{ft}^3}{s} \times \frac{211.5\ \text{colonies}}{100\ \text{ml}} \times \frac{24{,}465{,}755\ 100\ \text{ml} * s}{\text{ft}^3 * \text{day}} = \frac{1.72 \times 10^{11}\ \text{colonies}}{\text{day}}$$

The explicit margin of safety of 23.5 colonies/100 ml equals a daily loading of:

$$\frac{33.22\ \text{ft}^3}{s} \times \frac{23.5\ \text{colonies}}{100\ \text{ml}} \times \frac{24{,}465{,}755\ 100\ \text{ml} * s}{\text{ft}^3 * \text{day}} = \frac{1.91 \times 10^{10}\ \text{colonies}}{\text{day}}$$

For the **geometric mean** *E. coli* target concentration of 113.4 colonies/100 ml, the allowable *E. coli* loading is:

$$\frac{2.98\ \text{ft}^3}{s} \times \frac{113.4\ \text{colonies}}{100\ \text{ml}} \times \frac{24{,}465{,}755\ 100\ \text{ml} * s}{\text{ft}^3 * \text{day}} = \frac{8.28 \times 10^{9}\ \text{colonies}}{\text{day}}$$

The explicit margin of safety of 12.6 colonies/100 ml equals a daily loading of:

$$\frac{2.98\ \text{ft}^3}{s} \times \frac{12.6\ \text{colonies}}{100\ \text{ml}} \times \frac{24{,}465{,}755\ 100\ \text{ml} * s}{\text{ft}^3 * \text{day}} = \frac{9.20 \times 10^{8}\ \text{colonies}}{\text{day}}$$

The difference in the pathogen loading between the existing condition (violation event) and the allowable condition converted to a percent reduction represents the total load reduction needed to achieve the *E. coli* water quality criteria. The TMDL was calculated as the total daily *E. coli* load to Affonee Creek as evaluated at station AFFB-3. Table 4-1 shows the existing and allowable *E. coli* loads and required reductions for the Affonee Creek watershed.

Table 4-1 *E. coli* Loads and Required Reductions for Affonee Creek

Source	Existing Load (col/day)	Allowable Load (col/day)	Required Reduction (col/day)	% Reduction
Single Sample Load	1.97E+12	1.72E+11	1.80E+12	91%
Geometric Mean Load	5.26E+10	8.28E+09	4.43E+10	84%

From Table 4-1, compliance with the single sample criterion of 235 colonies/100 ml requires a reduction in the *E. coli* load of 91%. The TMDL, WLA, LA and MOS values necessary to achieve the applicable *E. coli* criterion are provided in Table 4-2 below.

Table 4-2 *E. coli* TMDL for Affonee Creek

TMDL[a]	Margin of Safety (MOS)	Waste Load Allocation (WLA)[e]			Load Allocation (LA)	
		WWTPs[b]	MS4s[c]	Leaking Collection Systems[d]		
(col/day)	(col/day)	(col/day)	(% reduction)	(col/day)	(col/day)	(% reduction)
1.91E+11	1.91E+10	NA	NA	0	1.72E11	91%

Note: NA = not applicable

a. TMDL was established using the single sample criterion of 235 colonies/100ml.

b. Future WWTPs must meet the applicable instream water quality criteria for pathogens at the point of discharge.

c. Future MS4 areas would be required to demonstrate consistency with the assumptions and requirements of this TMDL.

d. The objective for leaking collection systems is a WLA of zero. It is recognized, however, that a WLA of 0 colonies/day may not be practical. For these sources, the WLA is interpreted to mean a reduction in *E. coli* loading to the maximum extent practicable, consistent with the requirement that these sources not contribute to a violation of the water quality criteria for *E. coli*.

e. There are no CAFOs in the Affonee Creek watershed. Future CAFOs will be assigned a wasteload allocation (WLA) of zero.

4.3 TMDL Summary

Affonee Creek was first included on the §303(d) list for pathogens in 2018 based on ADEM's 2015 *E. coli* data from station AFFB-3. In 2020, 2021, and 2023, ADEM collected water quality data that confirmed the pathogen impairment and provided the basis for TMDL development.

A mass balance approach was used to calculate the *E. coli* TMDL for Affonee Creek. Based on the TMDL analysis, it was determined that a 91% reduction in *E. coli* loading was necessary to achieve compliance with applicable water quality standards.

Compliance with the terms and conditions of existing and future NPDES sanitary and stormwater permits will effectively implement the WLA and demonstrate consistency with the assumptions and requirements of the TMDL.

Required load reductions in the load allocation portion of this TMDL will be implemented through voluntary measures/best management practices (BMPs). Cooperation and active participation by the public and various other groups are critical to successful implementation of TMDLs. Local, citizen-led, and implemented management measures offer the most efficient and comprehensive avenue for reduction of loading rates from nonpoint sources. Therefore, TMDL implementation activities for nonpoint sources will be coordinated through interaction with local entities and may be eligible for CWA §319 grants through the Department's Nonpoint Source Unit.

The Department recognizes that adaptive implementation of this TMDL will be needed to achieve applicable water quality criteria, and we are committed to targeting the load reductions to improve water quality in the Affonee Creek watershed. As additional data and/or information becomes available, it may become necessary to revise and/or modify the TMDL accordingly.

5.0 Follow-up Monitoring

ADEM has adopted a basin approach to water quality monitoring, an approach that divides Alabama's sixteen major river basins into three groups. Each year, ADEM's water quality resources are concentrated in one of the three basin groups and are divided among multiple priorities including §303(d) listed waterbodies, waterbodies with active TMDLs, and other waterbodies as determined by the Department. Monitoring will help further characterize water quality conditions resulting from the implementation of best management practices and load reductions in the watershed. This monitoring will occur in each basin according to the schedule shown in Table 5-1.

Table 5-1 Follow-Up Monitoring Schedule

River Basin Group	Years to be Monitored
Black Warrior, Blackwater, Chattahoochee, Chipola, Choctawhatchee, Escambia, Perdido, Tennessee (Wheeler), Yellow	2024/2027
Coosa, Escatawpa, Tennessee (Guntersville), Tombigbee	2025/2028
Alabama, Cahaba, Mobile, Tallapoosa, Tennessee (Pickwick and Wilson)	2026/2029

6.0 Public Participation

As part of the public participation process, this TMDL was placed on public notice and made available for review and comment. The public notice was prepared and published in four newspapers in Montgomery, Huntsville, Birmingham, and Mobile, as well as submitted to persons who requested to be on ADEM's postal and electronic mailing distributions. In addition, the public notice and subject TMDL were made available on ADEM's Website: www.adem.alabama.gov. The public could also request paper or electronic copies of the TMDL by contacting Ms. Kimberly Minton at 334-271-7826 or kminton@adem.alabama.gov. The public was given an opportunity to review the TMDL and submit comments to the Department in writing. No written comments were received during the public notice period.

7.0 Appendix

7.1 References

ADEM Administrative Code, 2021. Water Division - Water Quality Program, Chapter 335-6-10, Water Quality Criteria.

ADEM Administrative Code, 2021. Water Division - Water Quality Program, Chapter 335-6-11, Use Classifications for Interstate and Intrastate Waters.

Alabama's Monitoring Program. 2015, 2020, 2021, & 2023. ADEM.

Alabama Department of Environmental Management (ADEM), *Alabama's Water Quality Assessment and Listing Methodology*, January 2024.

Alabama Department of Environmental Management, 2018, 2020 & 2022 §303(d) Lists and Fact Sheets. ADEM.

Alabama Department of Environmental Management (ADEM), Laboratory Data Qualification SOP #4910 Revision 7.2, 2022.

United States Environmental Protection Agency, 1991. *Guidance for Water Quality-Based Decisions: The TMDL Process*. Office of Water. EPA 440/4-91-001.

United States Environmental Protection Agency, 1986. *Quality Criteria for Water.* Office of Water. EPA 440/4-91-001.

7.2 Water Quality Data

Table 7-1 2015 ADEM Pathogen Data Collected on Affonee Creek

Station AFFB-3			
Visit Date	***E. coli* Single Sample (col/100 ml)**	**Detect Criteria**	**Flow (cfs)**
3/18/2015	155.3		30.5
4/14/2015	488.4		37.1
5/13/2015	365.4		7.8
6/10/2015	435.2		9.7
7/8/2015	613.1		6.6
8/12/2015	727.0		6.4
9/10/2015	2419.6		10.4
10/15/2015	648.8		3.8

Table 7-2 2020-2021 ADEM Pathogen Data Collected on Affonee Creek

Station AFFB-2			
Visit Date	***E. coli* Single Sample (col/100 ml)**	**Detect Criteria[a]**	**Flow (cfs)**
3/10/2020	99	H	59.4
1/5/2021	101.2		11.6
1/26/2021	1553.1		54.4
2/9/2021	38.4		12.0
2/23/2021	44.1		16.3
3/9/2021	45.7		10.8
3/23/2021	93.3		13.7
4/6/2021	98.7		17.7
4/27/2021	260.3		13.2

a. H denotes that the analytical holding times for analysis are exceeded.

Table 7-3 2023 ADEM Pathogen Data Collected on Affonee Creek

Station AFFB-3			
Visit Date	***E. coli* Single Sample (col/100 ml)**	**Detect Criteria[a,b]**	**Flow (cfs)**
4/3/2023	2419.6	GH	
6/5/2023	248.1	H	5.1
7/18/2023	299.4		6.2
7/20/2023	387.3		8.9
7/25/2023	387.3		5.3
7/27/2023	461.1		2.9
8/1/2023	365.4		8.3
8/15/2023	980.4	H	
9/6/2023	547.5		3.3
9/18/2023	613.1		4.9
9/20/2023	517.2		3.2
9/25/2023	727.0		1.9
9/27/2023	920.8		2.5
10/4/2023	1203.3	H	2.1

a. G denotes that the amount of analyte is above an acceptable level for quantification and is likely higher than the reported value.
b. H denotes that the analytical holding times for analysis are exceeded.

7.3 Affonee Creek Watershed Photos (August 2, 2022)

Figure 7-1 Affonee Creek at CR-16 (AFFB-2), Looking Upstream

Figure 7-2 Affonee Creek at CR-16 (AFFB-2), Looking Downstream

Figure 7-3 Affonee Creek at Big Barn Road (AFFB-3), Looking Upstream

Figure 7-4 Affonee Creek at Big Barn Road (AFFB-3), Looking Downstream

7.4 Affonee Creek Watershed Photos (April 3, 2023)

Figure 7-5 Affonee Creek at Big Barn Road (AFFB-3), Looking Upstream

Figure 7-6 Affonee Creek at Big Barn Road (AFFB-3), Looking Downstream