



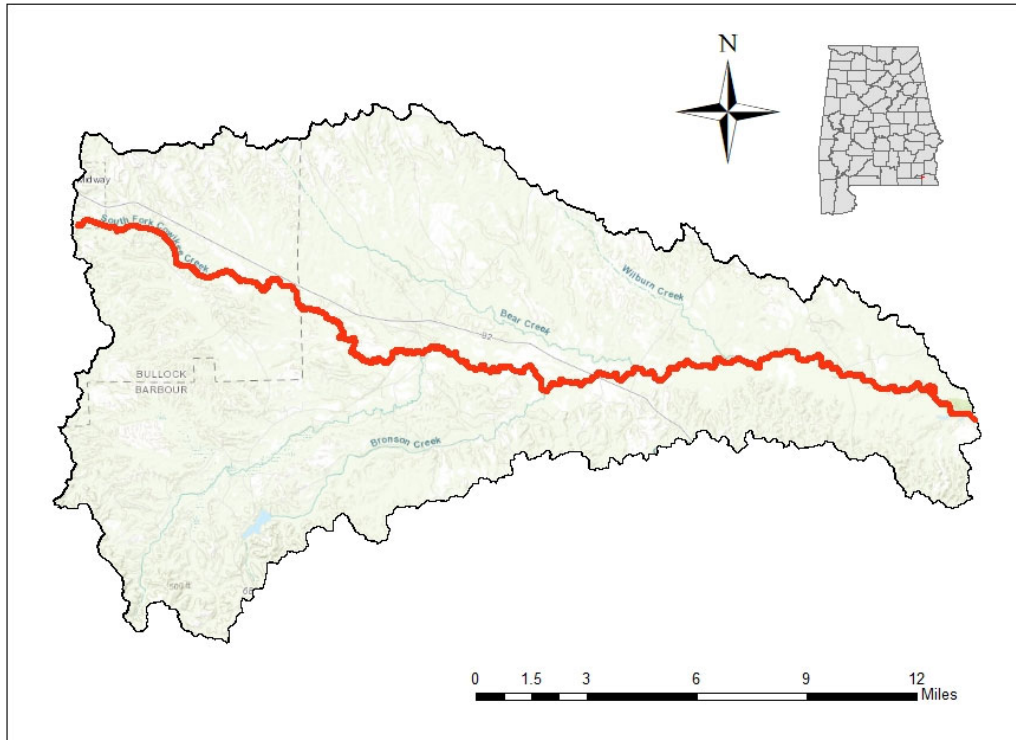
Final
Total Maximum Daily Load (TMDL)
for
South Fork Cowikee Creek

Assessment Unit ID # AL03130003-1204-100

Pathogens (*E. coli*)

Alabama Department of Environmental Management
Water Quality Branch
Water Division
July 2021

Figure 1-1: South Fork Cowikee Creek Watershed



| <i>Table of Contents</i> | | <i>Page</i> |
|---------------------------------|---|--------------------|
| 1.0 | Executive Summary | 1 |
| 2.0 | Basis for §303(d) Listing | 3 |
| 2.1 | Introduction | 3 |
| 2.2 | Problem Definition | 3 |
| 3.0 | Technical Basis for TMDL Development | 7 |
| 3.1 | Water Quality Target Identification | 7 |
| 3.2 | Source Assessment | 7 |
| 3.2.1 | Point Sources in the South Fork Cowikee Creek Watershed | 7 |
| 3.2.2 | Nonpoint Sources in the South Fork Cowikee Creek Watershed | 8 |
| 3.3 | Land Use Assessment | 8 |
| 3.4 | Linkage Between Numeric Targets and Sources | 11 |
| 3.5 | Data Availability and Analysis | 11 |
| 3.6 | Critical Conditions/Seasonal Variation | 14 |
| 3.7 | Margin of Safety | 14 |
| 4.0 | TMDL Development | 15 |
| 4.1 | Definition of a TMDL | 15 |
| 4.2 | Load Calculations | 15 |
| 4.3 | TMDL Summary | 18 |
| 5.0 | Follow Up Monitoring | 19 |
| 6.0 | Public Participation | 19 |
| 7.0 | Appendices | 20 |
| 7.1 | References | 20 |
| 7.2 | Water Quality Data | 21 |
| 7.3 | South Fork Cowikee Creek at Creek Watershed Photos (February 28, 2021) | 22 |

List of Figures

| | | |
|------------|--|----|
| Figure 1-1 | South Fork Cowikee Creek Watershed | ii |
| Figure 3-1 | Land Use Maps for the South Fork Cowikee Creek Watershed | 9 |
| Figure 3-2 | Primary Landuses in the South Fork Cowikee Creek Watershed | 10 |
| Figure 3-3 | Map of ADEM Sampling Station on South Fork Cowikee Creek | 12 |

List of Tables

| | | |
|-----------|---|----|
| Table 1-1 | 2020 <i>E. coli</i> Loads and Required Reductions | 2 |
| Table 1-2 | <i>E. coli</i> TMDL for South Fork Cowikee Creek | 2 |
| Table 2-1 | 2010 - 2014 E-Coli Exceedances for the South Fork Cowikee Creek | 6 |
| Table 3-1 | Land Use Areas for the South Fork Cowikee Creek Watershed | 10 |
| Table 3-2 | South Fork Cowikee Creek Sampling Station Description | 11 |
| Table 3-3 | 2020 E-Coli Exceedances for the South Fork Cowikee Creek | 13 |
| Table 4-1 | 2020 <i>E. coli</i> Loads and Required Reductions | 17 |
| Table 4-2 | <i>E. coli</i> TMDL for South Fork Cowikee Creek | 17 |
| Table 7-1 | ADEM Pathogen Data Collected on South Fork Cowikee Creek | 21 |

List of Photos

| | | |
|-----------|--|----|
| Photo 7-1 | South Fork Cowikee Creek at County Road 49, looking upstream | 22 |
| Photo 7-2 | South Fork Cowikee Creek at County Road 49, looking downstream | 22 |
| Photo 7-3 | South Fork Cowikee Creek at Highway 84, looking upstream | 23 |
| Photo 7-4 | South Fork Cowikee Creek at Highway 84, looking downstream | 23 |
| Photo 7-5 | South Fork Cowikee Creek at SFCB-1 (County Road 79), looking upstream | 24 |
| Photo 7-6 | South Fork Cowikee Creek at SFCB-1 (County Road 79), looking downstream | 24 |
| Photo 7-7 | South Fork Cowikee Creek at County Road 89, looking upstream | 25 |
| Photo 7-8 | South Fork Cowikee Creek at County Road 89, looking downstream | 25 |
| Photo 7-9 | South Fork Cowikee Creek at County Road 97 | 26 |

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).

South Fork Cowikee Creek is currently included on Alabama's §303(d) list for pathogens (*E. coli*) from its source to Walter F George Lake. South Fork Cowikee Creek forms in Bullock County near the Town of Midway, in the Chattahoochee River Basin. It flows southeast through Barbour County and into Walter F George Lake in east Barbour County. The total length of South Fork Cowikee Creek is 30.39 miles, and the total drainage area of the South Fork Cowikee Creek watershed is 143.98 square miles. South Fork Cowikee Creek has a use classification of Swimming and Other Whole Body Water-Contact Sports (Swimming) / Fish & Wildlife (F&W).

South Fork Cowikee Creek was first listed for pathogens on the §303(d) list in 2016 based on ADEM monitoring data collected from 2009 through 2014 at station SFCB-1. South Fork Cowikee Creek has subsequently been listed on the 2018 and 2020 §303(d) lists of impaired waterbodies.

In 2020, sampling studies were performed by ADEM on South Fork Cowikee Creek to further assess the water quality of the impaired stream. For purposes of this TMDL, the 2020 data will be used to assess the water quality of South Fork Cowikee Creek because it provides the best picture of the current water quality of the stream. The 2020 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. This TMDL will be developed from *E. coli* data collected at station SFCB-1. This bacterial data is listed in Appendix 7.2, Table 7-1 for reference. ADEM collected 15 samples and conducted two geometric mean studies on South Fork Cowikee Creek in 2020. According to the data, South Fork Cowikee Creek was not meeting the pathogen criteria applicable to its use classification of Swimming / F&W. Therefore, a TMDL for pathogens (*E. coli*) for the listed reach is necessary.

A mass balance approach was used for calculating the pathogen TMDL for South Fork Cowikee 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 in-stream 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 SFCB-1 (June 11, 2020) with a value of 1732.9 colonies/100 ml. This violation calls for a reduction of 88%.

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 South Fork Cowikee Creek, which are protective of *E. coli* water quality standards year round.

Table 1-1. 2020 *E. coli* Loads and Required Reductions

| Source | Existing Load (colonies/day) | Allowable Load (colonies/day) | Required Reduction (colonies/day) | % Reduction |
|----------------------------|------------------------------|-------------------------------|-----------------------------------|-------------|
| Single Sample Load | 4.68E+12 | 5.72E+11 | 4.11E+12 | 88% |
| Geometric Mean Load | 8.30E+11 | 1.49E+11 | 6.81E+11 | 82% |

Table 1-2. *E. coli* TMDL for South Fork Cowikee Creek

| TMDL ^e | Margin of Safety (MOS) | Waste Load Allocation (WLA) ^a | | | Load Allocation (LA) | |
|-------------------|------------------------|--|-------------------|---|----------------------|---------------|
| | | WWTPs ^b | MS4s ^c | Leaking Collection Systems ^d | | |
| (col/day) | (col/day) | (col/day) | (% reduction) | (col/day) | (col/day) | (% reduction) |
| 6.35E+11 | 6.35E+10 | NA | NA | 0 | 5.72E+11 | 88% |

Note: NA = not applicable

a. There are no CAFOs in the South Fork Cowikee Creek watershed. Future CAFOs will be assigned a waste load allocation (WLA) of zero.

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

Compliance with the terms and conditions of 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 towards targeting the load reductions to improve water quality in the South Fork Cowikee 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 30.39 miles of South Fork Cowikee Creek as impaired for pathogens. The §303(d) listing for pathogens was originally reported on Alabama's 2016 list of impaired waters based on 2009 to 2014 ADEM monitoring data from station SFCB-1, and was subsequently included on the 2018 and 2020 lists. The source of the impairment is listed on the 2020 §303(d) list as pasture grazing.

2.2 Problem Definition

| | |
|--|--|
| <u>Waterbody Impaired:</u> | South Fork Cowikee Creek – From Walter F George Lake to its source |
| <u>Impaired Reach Length:</u> | 30.39 miles |
| <u>Impaired Drainage Area:</u> | 143.98 square miles |
| <u>Water Quality Standard Violation:</u> | Pathogens (single sample, geometric mean) |
| <u>Pollutant of Concern:</u> | Pathogens (<i>E. coli</i>) |
| <u>Water Use Classification:</u> | Swimming and Other Whole Body Water-Contact Sports / Fish and Wildlife |

Usage Related to Classification:

The impaired stream segment is classified as Swimming and Other Whole Body Water-Contact Sports (Swimming) / Fish and Wildlife (F&W). Usage of waters in the Swimming 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.

Usage of waters in the Fish and Wildlife classification is described in ADEM Admin. Code R. 335-6-10-.09(5)(a), (b), (c), and (d).

(a) Best usage of waters: fishing, propagation of fish, aquatic life, and wildlife.

(b) Conditions related to best usage: the waters will be suitable for fish, aquatic life and wildlife propagation. The quality of salt and estuarine waters to which this classification is assigned will also be suitable for the propagation of shrimp and crabs.

(c) Other usage of waters: it is recognized that the waters may be used for incidental water contact year-round and whole body water-contact recreation during the months of May through October, except that water contact is strongly discouraged in the vicinity of discharges or other conditions beyond the control of the Department or the Alabama Department of Public Health.

(d) Conditions related to other usage: the waters, under proper sanitary supervision by the controlling health authorities, will meet accepted standards of water quality for outdoor swimming places and will be considered satisfactory for swimming and other whole body water-contact sports.

E. coli Criteria:

Criteria for acceptable bacteria levels for the Swimming 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 for acceptable bacteria levels for the Fish and Wildlife use classification are described in ADEM Admin. Code R. 335-6-10-.09(5)(e)7(i) and (ii) as follows:

7. *Bacteria:*

(i) *In non-coastal waters, bacteria of the E. coli group shall not exceed a geometric mean of 548 colonies/100 ml; nor exceed a maximum of 2,507 colonies/100 ml in any sample. In coastal waters, bacteria of the enterococci group shall not exceed a maximum of 275 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.*

(ii) *For incidental water contact and whole body water-contact recreation during the months of May through October, 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 298 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 158 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 bacterial coliform 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. 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.*

Criteria Exceeded:

South Fork Cowikee Creek was first included on the §303(d) list for pathogens in 2016 based on ADEM’s 2009 through 2014 *E. coli* data from station SFCB-1. Of the 15 *E. coli* samples collected at station SFCB-1, five violated the applicable single sample maximum criterion of 235 col/100 ml.

Table 2-1. 2010 - 2014 *E. coli* Exceedances for the South Fork Cowikee Creek Watershed

| Station ID | Date | <i>E. coli</i> – Single Sample (col/100ml) |
|------------|-----------|--|
| SFCB-1 | 5/18/2010 | 209.8 |
| SFCB-1 | 7/7/2010 | 172.2 ^H |
| SFCB-1 | 9/22/2010 | 53.7 |
| SFCB-1 | 5/4/2011 | 83.3 ^H |
| SFCB-1 | 7/26/2011 | 275.5 |
| SFCB-1 | 9/14/2011 | 127.4 ^H |
| SFCB-1 | 5/10/2012 | 115.3 |
| SFCB-1 | 7/17/2012 | 155.3 |
| SFCB-1 | 9/11/2012 | 114.5 |
| SFCB-1 | 5/1/2013 | 488.4 |
| SFCB-1 | 7/2/2013 | 325.5 |
| SFCB-1 | 9/11/2013 | 261.3 |
| SFCB-1 | 5/5/2014 | 325.5 |
| SFCB-1 | 7/17/2014 | 60.2 |
| SFCB-1 | 9/2/2014 | 107.6 |

H: The analytical holding times for analysis are exceeded.

3.0 Technical Basis for TMDL Development

3.1 Water Quality Target Identification

On December 11, 2009, the Alabama Environmental Management Commission adopted the *E. coli* criteria as the bacterial indicator to assess the levels of bacteria in freshwater. Prior to the adoption of the *E. coli* criteria, the fecal coliform criteria were used by ADEM as the bacterial indicator for freshwater. The *E. coli* criteria were recommended by the EPA as a better correlation to swimming and incidental water contact associated health effects than fecal coliform in the 1986 publication, *Quality Criteria for Water* (EPA 440/5-86-001). As a result, this TMDL will be developed from *E. coli* data collected at station SFCB-1.

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 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 South Fork Cowikee Creek Watershed

A point source can be defined as a discernible, 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 is currently one NPDES-regulated source in the South Fork Cowikee Creek watershed. The Town of Midway operates a municipal wastewater treatment facility that discharges to a spray field within the watershed. Since the facility is not permitted to discharge treated wastewater to a surface water of the state, it will not be given an allocation in this TMDL.

There are currently no Animal Feeding Operation/Concentrated Animal Feeding Operation (AFO/CAFO) facilities located within the South Fork Cowikee Creek watershed. In addition, the South Fork Cowikee Creek watershed does not presently qualify as a municipal separate storm sewer system (MS4) area.

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 South Fork Cowikee 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 be 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 South Fork Cowikee Creek watershed. Land use in this watershed is primarily forested/natural (91.99%) along with some agriculture and developed land (4.86% and 2.40%, respectively).

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 are common in unincorporated portions of the watershed and 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 South Fork Cowikee Creek watershed was determined using ArcMap with land use datasets derived from the 2016 National Land Cover Dataset (NLCD). Figure 3-1 and Table 3-1 display the land use areas for the South Fork Cowikee Creek watershed. Figure 3-2 is a graph depicting the primary land uses in the South Fork Cowikee Creek watershed.

The majority of the South Fork Cowikee Creek watershed is forested/natural (91.99%). Other land uses include agriculture (4.86%), developed land (2.40%), and open water (0.75%). 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. Developed land includes both commercial and residential land uses.

Figure 3-1. Land Use Map for the South Fork Cowikee Creek Watershed

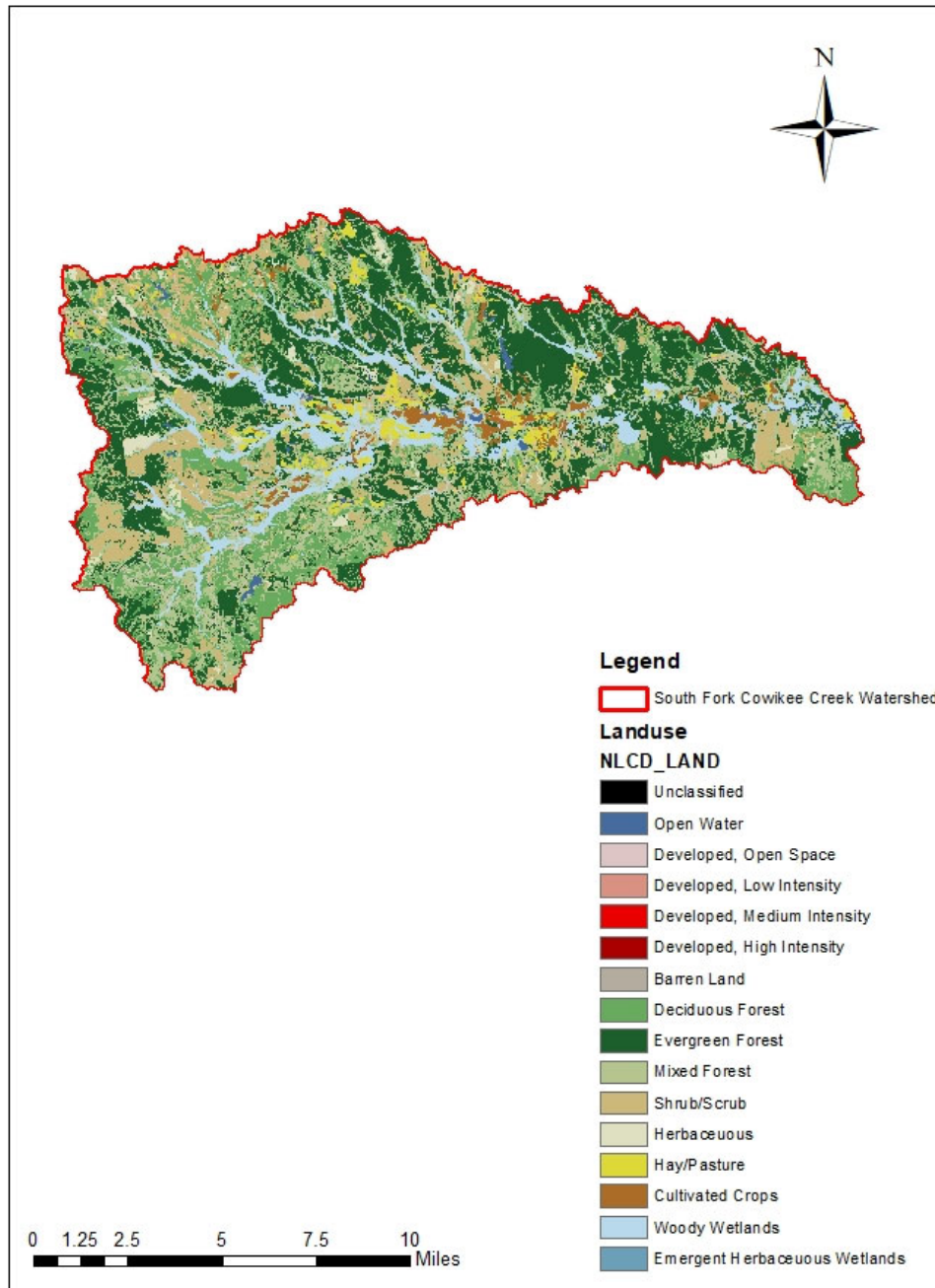
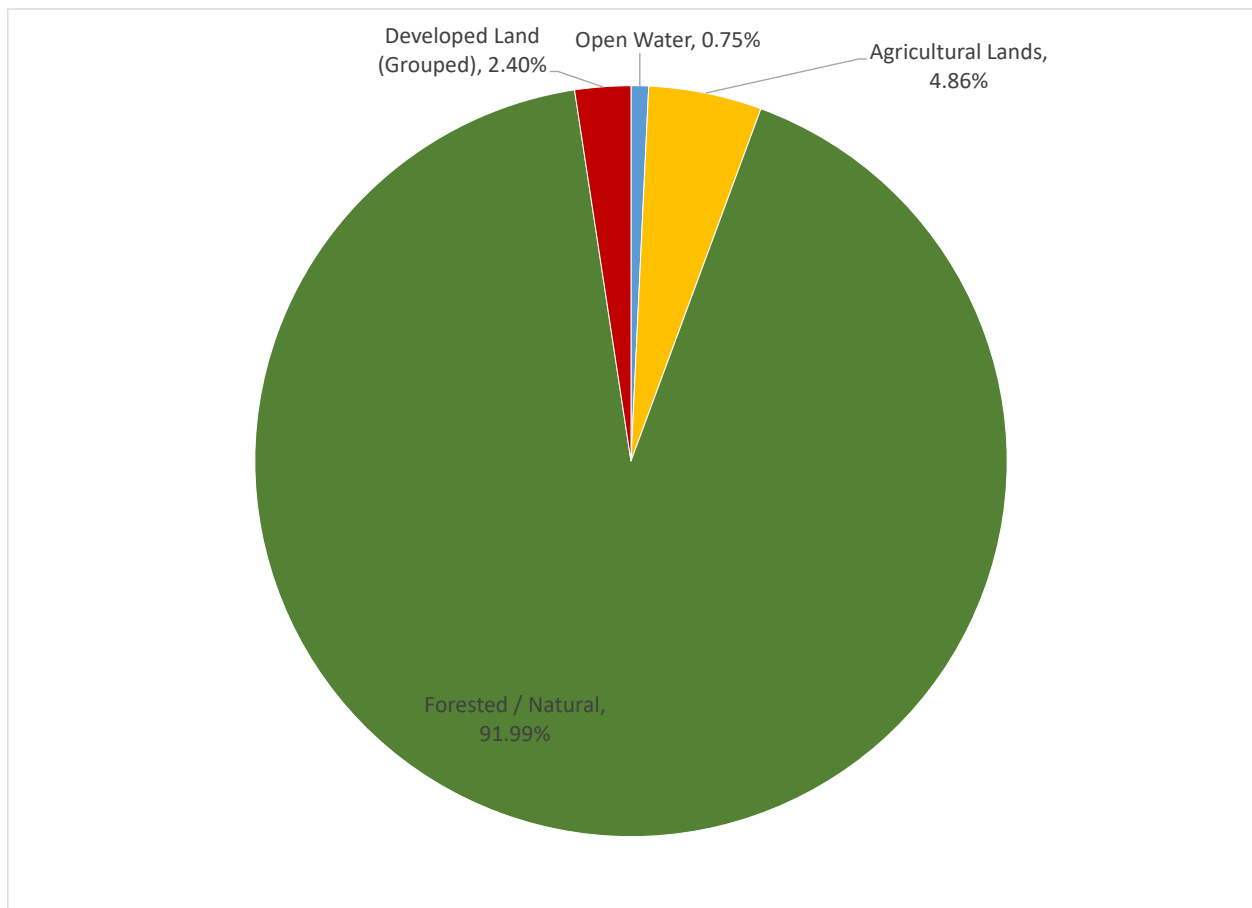


Table 3-1. Land Use Areas for the South Fork Cowikee Creek Watershed

| Class Description | Mi² | Acres | Percent |
|--------------------------|-----------------------|-----------------|----------------|
| Open Water | 1.08 | 692.73 | 0.75% |
| Agricultural Lands | 7.00 | 4478.14 | 4.86% |
| Forested / Natural | 132.45 | 84767.99 | 91.99% |
| Developed Land (Grouped) | 3.45 | 2211.03 | 2.40% |
| TOTALS → | 143.98 | 92149.88 | 100.00% |

Figure 3-2. Graph of Primary Land Uses in the South Fork Cowikee Creek Watershed



3.4 *Linkage Between Numeric Targets and Sources*

The main land use in the South Fork Cowikee Creek watershed is forest/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 source of pathogen loadings in South Fork Cowikee Creek is from the agricultural land uses. 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.

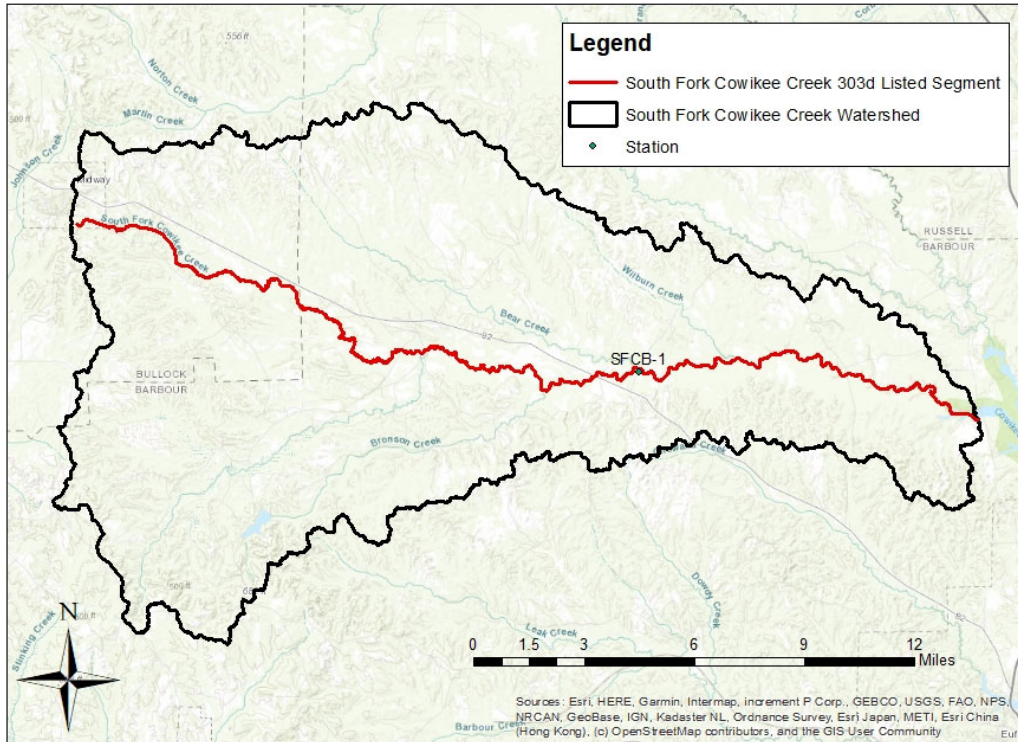
3.5 *Data Availability and Analysis*

In 2020, ADEM collected water quality data on South Fork Cowikee Creek at station SFCB-1. Table 3-2 and Figure 3-3 display the description and location for the ADEM sampling station. As previously mentioned, the 2020 data will be used for this TMDL. The January 2020 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. South Fork Cowikee Creek Sampling Station Description

| Years Sampled | Station ID | Data Source | Station Location | Latitude | Longitude |
|--|-------------------|--------------------|--|-----------------|------------------|
| 2010, 2011, 2012, 2013, 2014, and 2020 | SFCB-1 | ADEM | South Fork Cowikee Creek at Barbour Co. Rd. 79 | 32.0175 | -85.2958 |

Figure 3-3. Map of ADEM Sampling Station on South Fork Cowikee Creek



Of the 15 *E. coli* samples collected at station SFCB-1 during 2020, fourteen violated the single sample maximum criterion of 235 col/100 ml for the Swimming use classification. There were two sampling events for which geometric means were calculated; both geometric means (6/8/2020 through 7/8/2020 and 9/8/2020 through 9/23/2020) exceeded the *E. coli* criterion of 126 col/100ml. This data can be viewed in Table 3-3 below and also in Appendix 7.2, Table 7-1.

Table 3-3. 2020 *E. coli* Exceedances for the South Fork Cowikee Creek Watershed

| Station ID | Date | <i>E. coli</i> – Single Sample (col/100ml) | <i>E. coli</i> – Geometric mean (col/100ml) |
|------------|------------|--|---|
| SFCB-1 | 5/19/2020 | 1732.9 | |
| SFCB-1 | 6/8/2020 | 547.5 | 632.36 |
| SFCB-1 | 6/9/2020 | 290.9 | |
| SFCB-1 | 6/11/2020 | 1732.9 | |
| SFCB-1 | 6/16/2020 | 235.9 | |
| SFCB-1 | 7/8/2020 | 1553.1 | |
| SFCB-1 | 8/5/2020 | 260.3 ^H | |
| SFCB-1 | 9/8/2020 | 613.1 | 394.32 |
| SFCB-1 | 9/9/2020 | 325.5 | |
| SFCB-1 | 9/10/2020 | 290.9 | |
| SFCB-1 | 9/14/2020 | 224.7 | |
| SFCB-1 | 9/23/2020 | 730.8 | |
| SFCB-1 | 10/20/2020 | 235.9 | |
| SFCB-1 | 11/5/2020 | 290.9 | |
| SFCB-1 | 12/2/2020 | 648.8 | |

H: The analytical holding times for analysis are exceeded.

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. That value was 1732.9 colonies/100 ml that occurred on June 11, 2020, at station SFCB-1. A flow of 110.5 cfs was measured during this sampling event. The use of the highest exceedance to calculate the TMDL is expected to be protective of water quality in South Fork Cowikee 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 ten percent and calculating a mass loading target with measured 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 was reduced in the same fashion 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:

$$\text{TMDL} = \Sigma \text{WLAs} + \Sigma \text{LAs} + \text{MOS}$$

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 South Fork Cowikee 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 col/100 ml and the geometric mean criterion of 126 col/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 1732.9 colonies/100 ml times the flow measured at the time the sample was collected. This concentration was measured at SFCB-1 on June 11, 2020, and can be seen in Table 3-3 and Appendix 7.2, Table 7-1. The measured stream flow was 110.5 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 South Fork Cowikee Creek under the single sample exceedance condition.

$$\frac{110.5 \text{ ft}^3}{\text{s}} \times \frac{1732.9 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{4.68 \times 10^{12} \text{ colonies}}{\text{day}}$$

The **geometric mean** mass loading was calculated by multiplying the highest geometric mean exceedance concentration of 632.36 colonies/100 ml times the average of the five measured stream flows. This concentration was calculated based on measurements at SFCB-1 between June 8, 20 and July 8, 2020, which are shown above in Table 3-3. The average stream flow was determined to be 53.67 cfs. The product of these two values times the conversion factor gives the total mass loading (colonies per day) of *E. coli* to South Fork Cowikee Creek under the geometric mean exceedance condition.

$$\frac{53.67 \text{ ft}^3}{s} \times \frac{632.36 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * s}{\text{ft}^3 * \text{day}} = \frac{8.30 \times 10^{11} \text{ colonies}}{\text{day}}$$

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 multiplying 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:

$$\frac{110.5 \text{ ft}^3}{s} \times \frac{211.5 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * s}{\text{ft}^3 * \text{day}} = \frac{5.72 \times 10^{11} \text{ colonies}}{\text{day}}$$

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

$$\frac{110.5 \text{ ft}^3}{s} \times \frac{23.5 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * s}{\text{ft}^3 * \text{day}} = \frac{6.35 \times 10^{10} \text{ colonies}}{\text{day}}$$

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

$$\frac{53.67 \text{ ft}^3}{s} \times \frac{113.4 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * s}{\text{ft}^3 * \text{day}} = \frac{1.49 \times 10^{11} \text{ colonies}}{\text{day}}$$

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

$$\frac{53.67 \text{ ft}^3}{s} \times \frac{12.6 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * s}{\text{ft}^3 * \text{day}} = \frac{1.65 \times 10^{10} \text{ colonies}}{\text{day}}$$

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 South Fork Cowikee Creek as evaluated at station SFCB-1. Table 4-1 shows the existing and allowable *E. coli* loads and required reductions for the South Fork Cowikee Creek watershed.

Table 4-1. 2020 *E. coli* Load and Required Reduction

| Source | Existing Load (colonies/day) | Allowable Load (colonies/day) | Required Reduction (colonies/day) | % Reduction |
|---------------------|------------------------------|-------------------------------|-----------------------------------|-------------|
| Single Sample Load | 4.68E+12 | 5.72E+11 | 4.11E+12 | 88% |
| Geometric Mean Load | 8.30E+11 | 1.49E+11 | 6.81E+11 | 82% |

From Table 4-1, compliance with the single sample criterion of 235 colonies/100 ml requires a reduction of 88% in the *E. coli* load. 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 South Fork Cowikee Creek

| TMDL ^e | Margin of Safety (MOS) | Waste Load Allocation (WLA) ^a | | | Load Allocation (LA) | |
|-------------------|------------------------|--|-------------------|---|----------------------|---------------|
| | | WWTPs ^b | MS4s ^c | Leaking Collection Systems ^d | | |
| (col/day) | (col/day) | (col/day) | (% reduction) | (col/day) | (col/day) | (% reduction) |
| 6.35E+11 | 6.35E+10 | NA | NA | 0 | 5.72E+11 | 88% |

Note: NA = not applicable

a. There are no CAFOs in the South Fork Cowikee Creek watershed. Future CAFOs will be assigned a waste load allocation (WLA) of zero.

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

4.3 TMDL Summary

South Fork Cowikee Creek was first included on the §303(d) list for pathogens in 2016 based on ADEM's 2009 through 2014 *E. coli* data from station SFCB-1. In 2020, 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 South Fork Cowikee Creek. Based on the TMDL analysis, it was determined that an 88% 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 storm water 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 will be implemented through voluntary measures/best management practices (BMPs). Cooperation and active participation by the general public and various other groups is 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 South Fork Cowikee 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 statewide approach to water quality management. Each year, ADEM's water quality resources are divided among multiple priorities statewide 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.

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 the four major daily 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. At the end of the public review period, all written comments received during the public notice period became part of the administrative record. ADEM considered all comments received by the public prior to final completion of this TMDL and subsequent submission to EPA Region 4 for final approval.

7.0 *Appendices*

7.1 **References**

ADEM Administrative Code, 2017. Water Division - Water Quality Program, Chapter 335-6-10, Water Quality Criteria.

ADEM Administrative Code, 2017. Water Division - Water Quality Program, Chapter 335-6-11, Use Classifications for Interstate and Intrastate Waters.

Alabama's Monitoring Program. 2009 – 2014, 2020. ADEM.

Alabama Department of Environmental Management (ADEM), *Alabama's Water Quality Assessment and Listing Methodology*, January 2020.

Alabama Department of Environmental Management, 2016, 2018, and 2020 §303(d) Lists and Fact Sheets. ADEM.

Alabama Department of Environmental Management (ADEM), Laboratory Data Qualification SOP #4910 Revision 6.2, 2016.

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. ADEM Pathogen Data Collected on South Fork Cowikee Creek

| STATION ID | DATE | Flow (cfs) | Single Sample <i>E. coli</i> (col/100 ml) | <i>E. coli</i> dc | Geometric Mean <i>E. coli</i> (col/100 ml) |
|------------|------------|------------|---|-------------------|--|
| SFCB-1 | 5/18/2010 | | 209.8 | | |
| SFCB-1 | 7/7/2010 | | 172.2 | | |
| SFCB-1 | 9/22/2010 | | 53.7 | | |
| SFCB-1 | 5/4/2011 | | 83.3 | | |
| SFCB-1 | 7/26/2011 | | 275.5 | | |
| SFCB-1 | 9/14/2011 | | 127.4 | | |
| SFCB-1 | 5/10/2012 | | 115.3 | | |
| SFCB-1 | 7/17/2012 | | 155.3 | | |
| SFCB-1 | 9/11/2012 | | 114.5 | | |
| SFCB-1 | 5/1/2013 | | 488.4 | | |
| SFCB-1 | 7/2/2013 | | 325.5 | | |
| SFCB-1 | 9/11/2013 | | 261.3 | | |
| SFCB-1 | 5/5/2014 | | 325.5 | | |
| SFCB-1 | 7/17/2014 | | 60.2 | | |
| SFCB-1 | 9/2/2014 | | 107.6 | | |
| SFCB-1 | 5/18/2010 | 37 | 209.8 | | |
| SFCB-1 | 7/7/2010 | 10 | 172.2 | H | |
| SFCB-1 | 9/22/2010 | 2.1 | 53.7 | | |
| SFCB-1 | 5/4/2011 | 17 | 83.3 | H | |
| SFCB-1 | 7/26/2011 | 7 | 275.5 | | |
| SFCB-1 | 9/14/2011 | 1.5 | 127.4 | H | |
| SFCB-1 | 5/10/2012 | 7.7742 | 115.3 | | |
| SFCB-1 | 7/17/2012 | 5.103 | 155.3 | | |
| SFCB-1 | 9/11/2012 | 4.315 | 114.5 | | |
| SFCB-1 | 5/1/2013 | | 488.4 | | |
| SFCB-1 | 7/2/2013 | 22.6528 | 325.5 | | |
| SFCB-1 | 9/11/2013 | 20.738 | 261.3 | | |
| SFCB-1 | 5/5/2014 | 100.0436 | 325.5 | | |
| SFCB-1 | 7/17/2014 | 12.439 | 60.2 | | |
| SFCB-1 | 9/2/2014 | 4.3018 | 107.6 | | |
| SFCB-1 | 5/19/2020 | 64.277 | 1732.9 | | |
| SFCB-1 | 6/8/2020 | 42.426 | 547.5 | | |
| SFCB-1 | 6/9/2020 | 32.05 | 290.9 | | |
| SFCB-1 | 6/11/2020 | 110.5 | 1732.9 | | |
| SFCB-1 | 6/16/2020 | 15.21 | 235.9 | | |
| SFCB-1 | 7/8/2020 | 68.1688 | 1553.1 | | |
| SFCB-1 | 8/5/2020 | 19.8832 | 260.3 | H | |
| SFCB-1 | 9/8/2020 | 4.1024 | 613.1 | | |
| SFCB-1 | 9/9/2020 | 2.987 | 325.5 | | |
| SFCB-1 | 9/10/2020 | 3.109 | 290.9 | | |
| SFCB-1 | 9/14/2020 | 8.049 | 224.7 | | |
| SFCB-1 | 9/23/2020 | | 730.8 | | |
| SFCB-1 | 10/20/2020 | 17.0702 | 235.9 | | |
| SFCB-1 | 11/5/2020 | 12.274 | 290.9 | | |
| SFCB-1 | 12/2/2020 | 33.454 | 648.8 | | |

H: The analytical holding times for analysis are exceeded.

7.3 South Fork Cowikee Creek Watershed Photos (February 28, 2021)

Photo 7-1 South Fork Cowikee Creek at County Road 49, Looking Upstream



Photo 7-2 South Fork Cowikee Creek at County Road 49, Looking Downstream



Photo 7-3 South Fork Cowikee Creek at Highway 84, Looking Upstream



Photo 7-4 South Fork Cowikee Creek at Highway 84, Looking Downstream



Photo 7-5 South Fork Cowikee Creek at SFCB-1 (County Road 79), Looking Upstream



Photo 7-6 South Fork Cowikee Creek at SFCB-1 (County Road 79), Looking Downstream



Photo 7-7 South Fork Cowikee Creek at County Road 89, Looking Upstream



Photo 7-8 South Fork Cowikee Creek at County Road 89, Looking Downstream



Photo 7-9 South Fork Cowikee Creek at County Road 97

