



Final
Total Maximum Daily Load (TMDL)
for
Mill Creek

Assessment Unit ID # AL03160113-0201-100

Pathogens (*E. coli*)

Tuscaloosa County

Alabama Department of Environmental Management
Water Quality Branch
Water Division
August 2025

Figure 1: Mill Creek Watershed

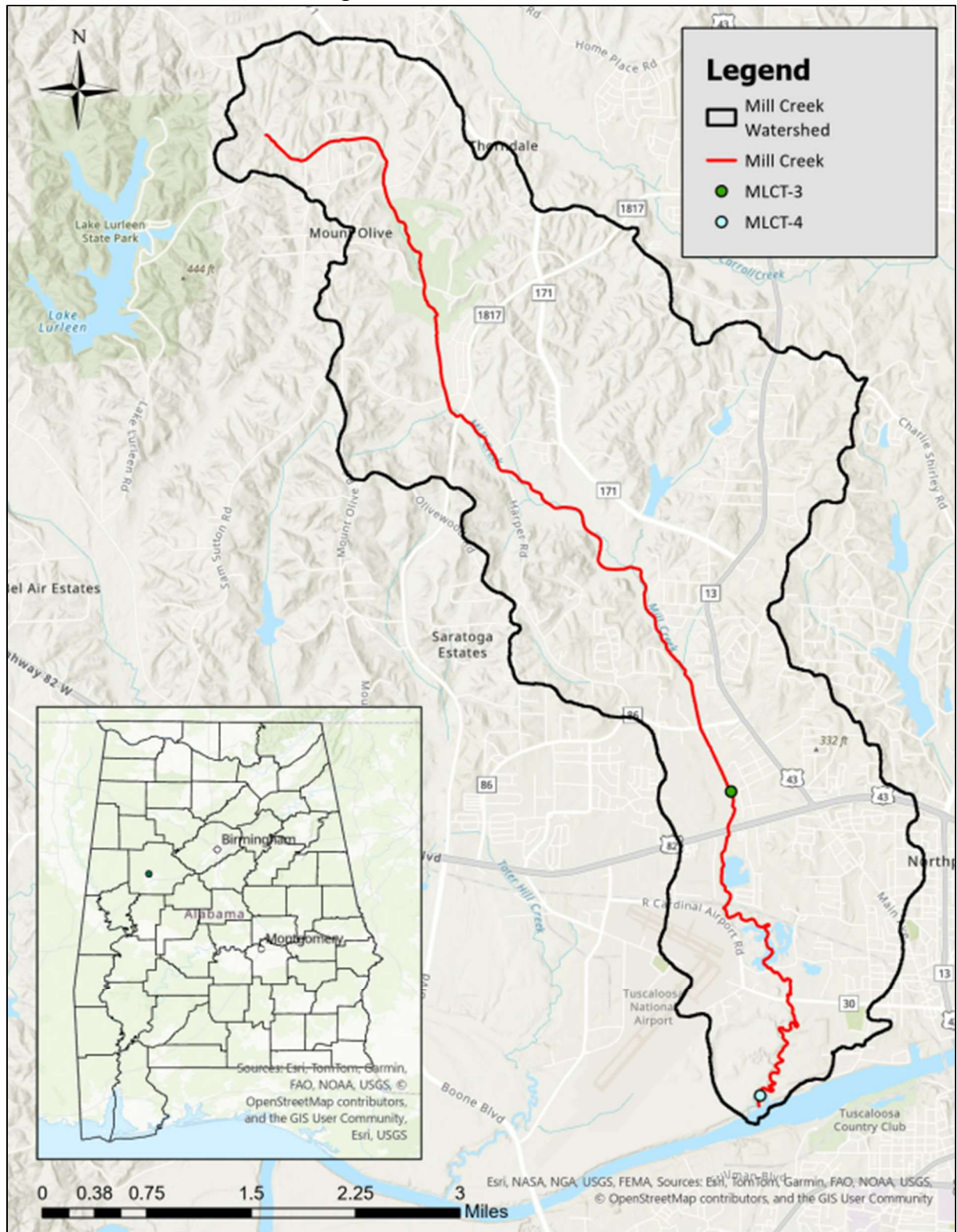


Table of Contents

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.....	5
3.1	Water Quality Target Identification.....	5
3.2	Source Assessment.....	5
3.2.1	Continuous Point Sources	5
3.2.2	Non-continuous Point Sources.....	7
3.2.3	Municipal Separate Storm Sewer Systems (MS4s)	7
3.2.4	Sanitary Sewer Overflows	8
3.2.5	Nonpoint Sources.....	9
3.3	Land Use Assessment	10
3.4	Linkage between Numeric Targets and Sources.....	13
3.5	Data Availability and Analysis.....	13
3.6	Critical Conditions	15
3.7	Margin of Safety	16
4.0	TMDL Development	16
4.1	Definition of a TMDL	16
4.2	Load Calculations.....	16
4.3	TMDL Summary.....	19
5.0	Follow-up Monitoring	20
6.0	Public Participation	20
7.0	Appendices.....	21
7.1	References.....	21
7.2	2017 Monitoring Data	22
7.3	Mill Creek Watershed Photos.....	23

List of Tables

Table 1: <i>E. coli</i> Loads and Required Reductions for AL03160113-0201-100	2
Table 2: <i>E. coli</i> TMDL for Mill Creek	2
Table 3: Data for §303(d) Listing - Ambient Monitoring.....	5
Table 4: SSOs in the Mill Creek Watershed	9
Table 5: Mill Creek Watershed Landuse (2021 NLCD)	10
Table 6: Station Descriptions	14
Table 7: 2024 <i>E. coli</i> Data for Mill Creek.....	15
Table 8: <i>E. coli</i> Loads and Required Reductions for AL03160113-0201-100.....	18
Table 9: <i>E. coli</i> TMDL for Mill Creek	19
Table 10: Follow-up Monitoring Schedule.....	20
Table 11: Monitoring Data at Stations MLCT-3 and MLCT-4	22

List of Figures

Figure 1: Mill Creek Watershed.....	ii
Figure 2: NPDES Regulated Continuous Point Sources.....	6
Figure 3: Mill Creek Watershed Cumulative Land Use	11
Figure 4: 2021 NLCD Map of the Mill Creek Watershed.....	12
Figure 5: ADEM 2024 Sampling Stations in the Mill Creek Watershed	14
Figure 6: At MLCT-3: Upstream View of Mill Creek (8/21/2024)	23
Figure 7: At MLCT-3: Downstream View of Mill Creek (8/21/2024).....	23
Figure 8: At MLCT-4: Upstream View of Mill Creek (8/21/2024).....	24
Figure 9: At MLCT-4: Downstream View of Mill Creek (8/21/2024).....	24

1.0 Executive Summary

Section 303(d) of the Clean Water Act and the Environmental Protection Agency (EPA) 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 wasteload allocations (WLAs) for point sources, load allocations (LAs) for nonpoint sources including natural background levels, and a margin of safety (MOS).

Mill Creek, part of the Black Warrior River basin, begins between Lake Lurleen and Alabama Highway 171 in Tuscaloosa County and flows south for 10.36 miles into the Black Warrior River (Warrior Lake). The total drainage area for the Mill Creek watershed is approximately 15.6 square miles. Mill Creek has a designated use classification of Fish and Wildlife (F&W) and is currently included on Alabama's §303(d) list as impaired for pathogens (*E. coli*) from Warrior Lake to its source.

Mill Creek was first included on the §303(d) list for pathogens in 2018 based on data collected by the Alabama Department of Environmental Management (ADEM) in 2012 at ADEM station MLCT-3. This data, which can be found in Table 3, indicated that the stream was impaired for pathogens (*E. coli*), which will be the basis for this TMDL.

In 2024, §303(d) sampling studies were performed by ADEM on Mill Creek to further assess the water quality of the impaired stream. ADEM collected twenty-four *E. coli* samples from Mill Creek at stations MLCT-3 and MLCT-4. A review of the general water quality and intensive *E. coli* studies revealed that Mill Creek was still not meeting the pathogen criteria applicable to its use classification (F&W).

A mass balance approach was used for calculating the pathogen TMDL for Mill 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 that 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 268.2 colonies/100 ml (298 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 *E. coli* exceedance at station MLCT-3 on July 17, 2024, with a value of 2419.6 colonies/100 ml. This violation calls for a reduction of 89%.

Table 1 is a summary of the estimated existing load, allowable load, and percent reduction for the single sample criterion and the geometric mean criterion. Table 2 lists the TMDL, defined as the maximum allowable *E. coli* loading under critical conditions for Mill Creek.

Table 1: *E. coli* Loads and Required Reductions for AL03160113-0201-100

Source	Existing Load (colonies/day)	Allowable Load (colonies/day)	Required Reduction (colonies/day)	% Reduction
Single Sample Load	9.58 x 10 ¹¹	1.06 x 10 ¹¹	8.52 x 10 ¹¹	89%
Geometric Mean Load	1.20 x 10 ¹¹	1.48 x 10 ¹⁰	1.05 x 10 ¹¹	88%
Point Source Load (Northport WWTP)	1.32 x 10 ⁹	5.64 x 10 ¹⁰	0	0%

Table 2: *E. coli* TMDL for Mill Creek

TMDL ^e	Margin of Safety (MOS)	Waste Load Allocation (WLA) ^a			Load Allocation (LA)	
		WWTPs ^b	Stormwater (MS4s and other NPDES sources) ^c	Leaking Collection Systems ^d		
(col/day)	(col/day)	(col/day)	% reduction	(col/day)	(col/day)	(col/day)
1.18 x 10 ¹¹	1.18 x 10 ¹⁰	5.64 x 10 ¹⁰	89%	0	4.98 x 10 ¹⁰	89%

a. There are no CAFOs in the Mill Creek watershed. Future CAFOs will be assigned a WLA of zero.

b. WLA for WWTPs is expressed as a daily maximum. Current and future WWTPs must meet the applicable in-stream water quality criteria for pathogens at the point of discharge.

c. Current and future MS4 areas and other NPDES stormwater sources will be required to demonstrate consistency with the assumptions and requirements of this TMDL through implementation and maintenance of BMPs on a case-by-case basis. For the purposes of this TMDL, the 89% reduction for MS4s and other stormwater sources should not be interpreted as a numeric permit limitation.

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 practical, 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 298 colonies/100 ml.

Compliance with the terms and conditions of existing and future National Pollutant Discharge Elimination System (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 Mill Creek watershed. As additional data and/or information become 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 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 in-stream 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 10.36 miles of Mill Creek as impaired for pathogens. The §303(d) listing was originally reported on Alabama's 2018 List of Impaired Waters based on data collected in 2012 and has been included on all subsequent lists.

2.2 Problem Definition

Waterbody Impaired:	Mill Creek – from the Warrior Lake to its source
Impaired Reach Length:	10.36 miles
Impaired Drainage Area:	15.6 sq. miles
Water Quality Standard Violation:	Pathogens (Single Sample Maximum, Geometric Mean)
Pollutant of Concern:	Pathogens (<i>E. coli</i>)
Water Use Classification:	Fish and Wildlife

Usage Related to Classification:

Mill Creek is classified as Fish and Wildlife (F&W). Usage of waters in the F&W 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 areas and will be considered satisfactory for swimming and other whole body water-contact sports.*

E. coli Criteria:

Criteria for acceptable bacteria levels for the F&W 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:

Mill Creek was placed on the §303(d) list for pathogens in 2018 based on data collected during 2012 at station MLCT-3. *E. coli* sampling at ADEM monitoring station MLCT-3 showed that the applicable single sample criterion was exceeded in four out of eight samples. At the time of listing, the source of pathogens was linked to collection system failures and pasture grazing. The listing data is summarized in Table 3 on the following page.

Table 3: Data for §303(d) Listing - Ambient Monitoring

Station ID	Sample Date	E. Coli (col/100ml)	E. coli Detect Criteria *	Single Sample Criteria	Flow (cfs)	Flow Measured by ADEM
MLCT-3	4/3/2012	517.2		2507	12.23	YES
MLCT-3	5/8/2012	920.8	H	298	7.61	YES
MLCT-3	6/14/2012	166.4		298	6.48	YES
MLCT-3	7/11/2012	201.4	H	298	6.32	YES
MLCT-3	8/9/2012	517.2		298	7.12	YES
MLCT-3	9/5/2012	435.2	H	298	34.97	YES
MLCT-3	10/3/2012	1299.7		298	11.77	YES
MLCT-3	10/31/2012	235.9	H	298	7.75	YES

*H - The analytical holding time for analysis was exceeded.

3.0 Technical Basis for TMDL Development

3.1 Water Quality Target Identification

For the purpose of this TMDL, a single sample maximum *E. coli* target of 268.2 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 298 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 at least five samples taken no less than 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

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 pathogen 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 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.

3.2.1 Continuous Point Sources

There is currently one NPDES-regulated continuous point source in the Mill Creek watershed. Northport WWTP (AL0064394) discharges to Mill Creek. The location of the discharge is shown below in Figure 2. The current NPDES permit for Northport WWTP includes *E. coli* limitations equivalent to the water quality criteria for the F&W use classification, as follows:

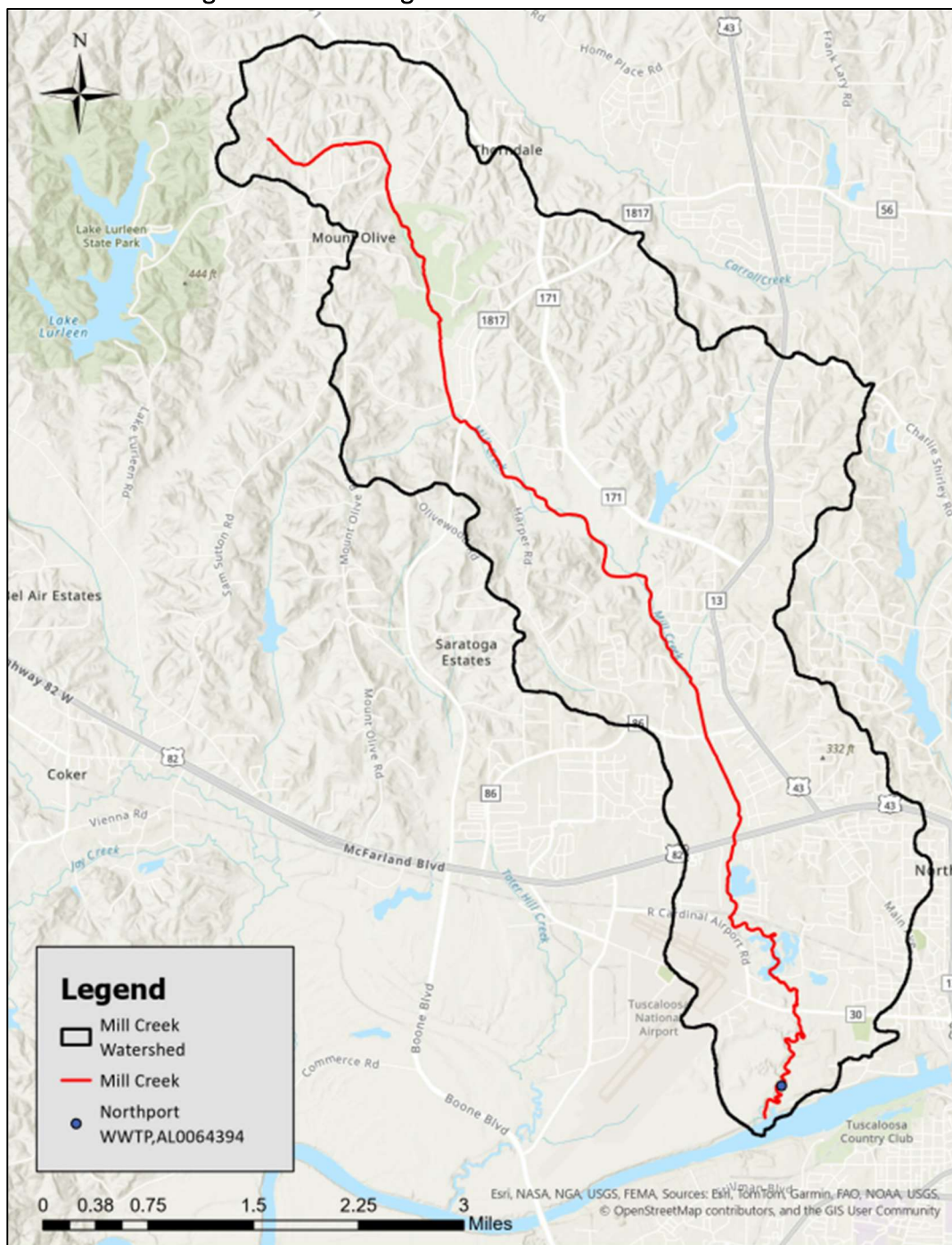
- May – October (monthly average): 126 colonies/100mL
- May – October (daily maximum): 298 colonies/100mL

November – April (monthly average): 548 colonies/100mL

November – April (daily maximum): 2507 colonies/100mL

Any future NPDES-regulated continuous discharges that are considered by the Department to be a pathogen source will be required to meet the in-stream water quality criteria for pathogens at the point of discharge.

Figure 2. NPDES Regulated Continuous Point Sources



3.2.2 Non-Continuous Point Sources

Northport WWTP is also permitted through the NPDES program to discharge stormwater runoff in the Mill Creek watershed. The facility will be required to comply with the provisions of this TMDL through implementation of Best Management Practices (BMPs) for the permitted stormwater outfalls.

There are currently multiple NPDES-permitted non-continuous dischargers located in the Mill Creek watershed, including facilities associated with industrial, mining, and construction activities. These facilities are not required to monitor for *E. coli* and are not considered to be a source of pathogens due to the nature of their operations. As such, no *E. coli* loading will be attributed to these facilities, nor will they receive an allocation in this TMDL.

There are currently no Animal Feeding Operation/Concentrated Animal Feeding Operation (AFO/CAFO) facilities located within the Mill 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 wasteload allocation of zero.

There are currently no registered sites in the Mill Creek watershed where land application of by-products for beneficial use is present. Beneficial use sites are regulated by ADEM's Land Division and are required to implement appropriate BMPs and agronomic application rates to protect the environment.

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.

3.2.3 Municipal Separate Storm Sewer Systems (MS4s)

Urban areas designated as part of the Municipal Separate Storm Sewer System (MS4) program are regulated by NPDES, and as such, are considered to be point sources by EPA and receive WLAs in TMDLs. The EPA defines an MS4 as *"a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):*

- (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law);*
- (ii) Designed or used for collecting or conveying stormwater;*
- (iii) Which is not a combined sewer; and*
- (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2."*

During rain events in an urbanized watershed, stormwater runoff has the potential to collect pollutants which are transported through MS4 systems before discharging into state waters. Therefore, in 1990 the EPA developed the NPDES stormwater program, which promulgated rules, in two different phases, in order to address the potential negative water quality effects

associated with stormwater runoff. In 1990, the EPA issued Phase I regulations under the NPDES stormwater program, which required both medium and large cities and also counties with populations of 100,000 or more to obtain NPDES permit coverage specifically for their stormwater discharges. In 1999, the second phase of the NPDES stormwater program amended existing regulations in addition to requiring NPDES permits for stormwater discharges from certain small MS4 systems.

The permittees that are addressed in the TMDL process include those Phase I and Phase II municipalities covered under the MS4 NPDES program whose boundaries of urban areas are located within the Mill Creek watershed. The Tuscaloosa County Commission (ALR040001), the City of Northport (ALR040017) and the City of Tuscaloosa (ALR040021) each have a Phase II MS4 permit and will be included in the stormwater WLA. Current and future MS4s will be required to demonstrate consistency with the assumptions and requirements of this TMDL through implementation of BMPs on a case-by-case basis.

3.2.4 Sanitary Sewer Overflows

Sanitary sewer overflows (SSOs) have the potential to severely impact water quality and can often result in the violation of water quality standards. It is the responsibility of the NPDES wastewater discharger or collection system operator for non-permitted “collection only” systems to ensure that releases do not occur. Unfortunately, releases to surface waters from SSOs are not always preventable or reported. From review of ADEM files, it was found that twenty-seven SSOs were reported from 2019–2024 within the Mill Creek watershed. The numerous SSOs are considered to be a source of pathogens to Mill Creek. The reported SSOs are listed in Table 4 below.

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Table 4. SSOs in the Mill Creek Watershed

Permittee Name	SSO Began Date	Duration (Hours)	SSO Volume (Gal)	Latitude	Longitude
City of Northport	2/21/2019	4	1,000 < SSO ≤ 10,000	33.243962	-87.603703
City of Northport	4/12/2019	1	≤1,000	33.23514	-87.587043
City of Northport	7/6/2019	7	10,000 < SSO ≤ 25,000	33.226391	-87.588616
City of Northport	12/16/2019	5	10,000 < SSO ≤ 25,000	33.245715	-87.60108
City of Northport	12/22/2019	3	1,000 < SSO ≤ 10,000	33.24091	-87.60257
City of Northport	2/10/2020	26	1,000 < SSO ≤ 10,000	33.24091	-87.60257
City of Northport	2/20/2020	7	≤1,000	33.24091	-87.60257
City of Northport	2/28/2020	1	1,000 < SSO ≤ 10,000	33.2407	-87.585608
City of Northport	3/5/2020	9	≤1,000	33.24091	-87.60257
City of Northport	3/6/2020	2	1,000 < SSO ≤ 10,000	33.237245	-87.604762
City of Northport	6/11/2020	2	1,000 < SSO ≤ 10,000	33.247757	-87.606384
City of Northport	7/8/2020	2	≤1,000	33.219871	-87.597547
City of Northport	1/18/2021	1	200	33.25341	-87.60411
City of Northport	2/17/2021	1	≤1,000	33.243543	-87.604242
City of Northport	2/24/2021	1	1,000 < SSO ≤ 10,000	33.230256	-87.592781
City of Northport	3/5/2021	1	≤1,000	33.23908	-87.58312
City of Northport	6/11/2021	6	≤1,000	33.24091	-87.60257
City of Northport	6/19/2021	5	75,000 < SSO ≤ 100,000	33.2408	-87.602519
City of Northport	5/12/2022	3	1,000 < SSO ≤ 10,000	33.24535183	-87.60138596
City of Northport	5/12/2022	6	25,000 < SSO ≤ 50,000	33.22747788	-87.58783378
City of Northport	8/30/2022	2	1,000 < SSO ≤ 10,000	33.23882464	-87.5832272
City of Northport	10/17/2022	2	≤1,000	33.2388903	-87.5837219
City of Northport	6/28/2023	6	1,000 < SSO ≤ 10,000	33.2453283	-87.6002958
City of Northport	10/2/2023	1	≤1,000	33.2550509	-87.6030158
City of Northport	12/3/2023	1	200	33.2522073	-87.6066968
City of Northport	5/9/2024	1	≤1,000	33.2378047	-87.5928042
City of Northport	10/21/2024	1	1,000 < SSO ≤ 10,000	33.247268	-87.599695

3.2.5 Nonpoint Sources

Nonpoint sources of bacteria do not have a defined discharge point but rather occur over the entire length of a stream or waterbody. On the land surface, bacteria can accumulate over time and be washed into streams or waterbodies during rain events. Therefore, there is some net loading of bacteria into streams as dictated by the watershed hydrology.

Agricultural land is commonly 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 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 will 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 developed areas is potentially attributable to multiple sources including stormwater runoff, unpermitted discharges of wastewater, runoff from improper disposal of waste materials, failing septic tanks, and domestic animals. On-site septic systems may be direct or indirect sources of bacterial pollution via ground and surface waters due to system failures and malfunctions.

The nature and extent of bacterial sources in the watershed will be identified more specifically during the implementation phase of the TMDL.

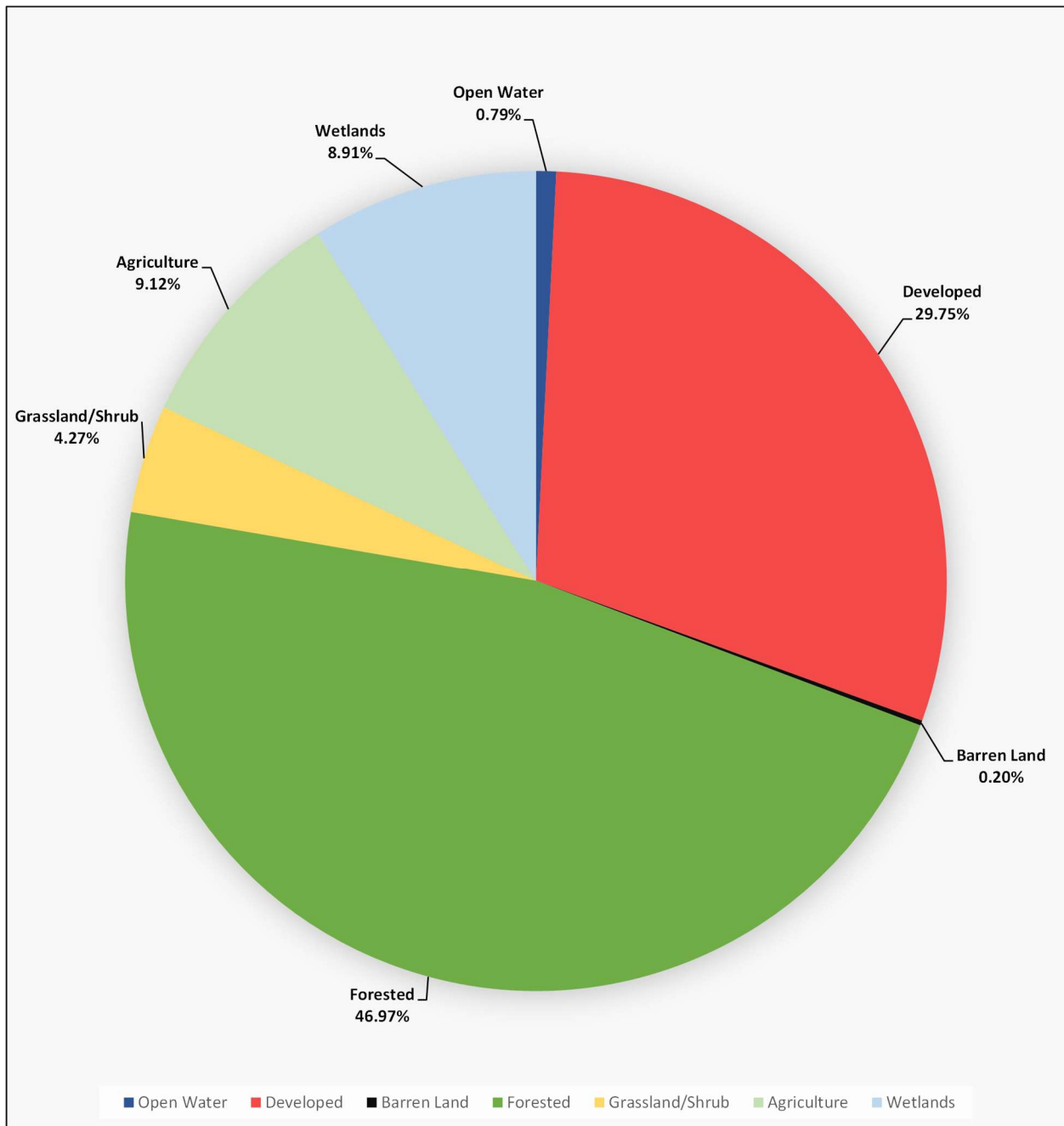
3.3 Land Use Assessment

Land use percentages for the Mill Creek watershed were determined from the 2021 National Land Cover Dataset (NLCD). The total drainage area of the Mill Creek watershed is approximately 15.6 square miles. Table 5 lists the various land uses and their associated percentages for the Mill Creek watershed. A pie chart illustrating the major cumulative land use types for the Mill Creek watershed is shown in Figure 3.

Table 5: Mill Creek Watershed Landuse (2021 NLCD)

2021 Alabama NLCD Land Cover	NLCD Legend	Area (square miles)	%
Open Water	11	0.12371	0.79%
Developed, Open Space	21	1.90808	12.20%
Developed, Low Intensity	22	1.41568	9.05%
Developed, Medium Intensity	23	1.01537	6.49%
Developed, High Intensity	24	0.31448	2.01%
Barren Land	31	0.03093	0.20%
Deciduous Forest	41	3.52531	22.54%
Evergreen Forest	42	0.82634	5.28%
Mixed Forest	43	2.99503	19.15%
Shrub/Scrub	52	0.30962	1.98%
Herbaceous	71	0.35757	2.29%
Hay/Pasture	81	1.42228	9.09%
Cultivated Crops	82	0.00347	0.02%
Woody Wetlands	90	1.32603	8.48%
Emergent Herbaceous Wetlands	95	0.06741	0.43%
Total Land Use		15.6	100%
Cumulative Alabama Land Cover	NLCD Legend	Area (square miles)	%
Open Water	11	0.12	0.79%
Developed	21,22,23,24	4.65	29.75%
Barren Land	31	0.03	0.20%
Forested	41,42,43	7.35	46.97%
Grassland/Shrub	52,71	0.67	4.27%
Agriculture	81,82	1.43	9.12%
Wetlands	90,95	1.39	8.91%
Total Land Use		15.6	100%

Figure 3: Mill Creek Watershed Cumulative Land Use



As can be seen from an inspection of the table, chart, and map above, forested land is the predominant land use in the watershed at 46.97%. Developed land covers 29.75% and represents both commercial and residential urbanized land uses and includes the following individual land use categories: Developed – Open Space, Developed – Low Intensity, Developed – Medium Intensity, and Developed – High Intensity. The remaining land use in the watershed consists of agriculture (9.12%), wetlands (8.91%), and grassland/shrub (4.27%).

3.4 Linkage between Numeric Targets and Sources

The dominant land use coverage in the Mill Creek watershed is forested/natural, followed by developed land, agriculture, and wetlands. 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 the Mill Creek watershed are urban run-off, sanitary sewer system failures and agriculture. 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 2017 and 2024, sampling studies were performed by ADEM on Mill Creek at stations MLCT-3 and MLCT-4 to further assess the water quality of the impaired stream. For purposes of this TMDL, the 2024 data will be used to assess the water quality of Mill Creek because it is the most recent data and provides the best picture of the current water quality conditions 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.

Eighteen *E. coli* samples were collected during 2024 at station MLCT-3, and intensive bacteria studies were performed during the months of June and August. Each intensive bacteria study consisted of collecting at least five *E. coli* bacteria samples over a thirty-day time window, with a minimum of 24 hours between each sample collection. Six *E. coli* samples were also collected at station MLCT-4 during 2024.

Of the eighteen total *E. coli* samples taken at MLCT-3, nine exceeded the summer single sample maximum criterion of 298 colonies/100 ml. Furthermore, the geometric mean criterion of 126 colonies/100 ml was exceeded during both intensive bacteria studies. None of the six samples collected at MLCT-4 exceeded the applicable single sample criterion. A summary of the *E. coli* results is provided below in Table 7. All *E. coli* criteria exceedances are highlighted in red.

Table 6: Station Descriptions

Station	Agency	Latitude	Longitude	Description
MLCT-3	ADEM	33.241368	-87.603194	Mill Creek at the end of Eleanor Street off Hwy 43.
MLCT-4	ADEM	33.20974	-87.59937	Mill Creek at Oliver Dam Road prior to confluence with Black Warrior River.

Figure 5: ADEM 2024 Sampling Stations in the Mill Creek Watershed

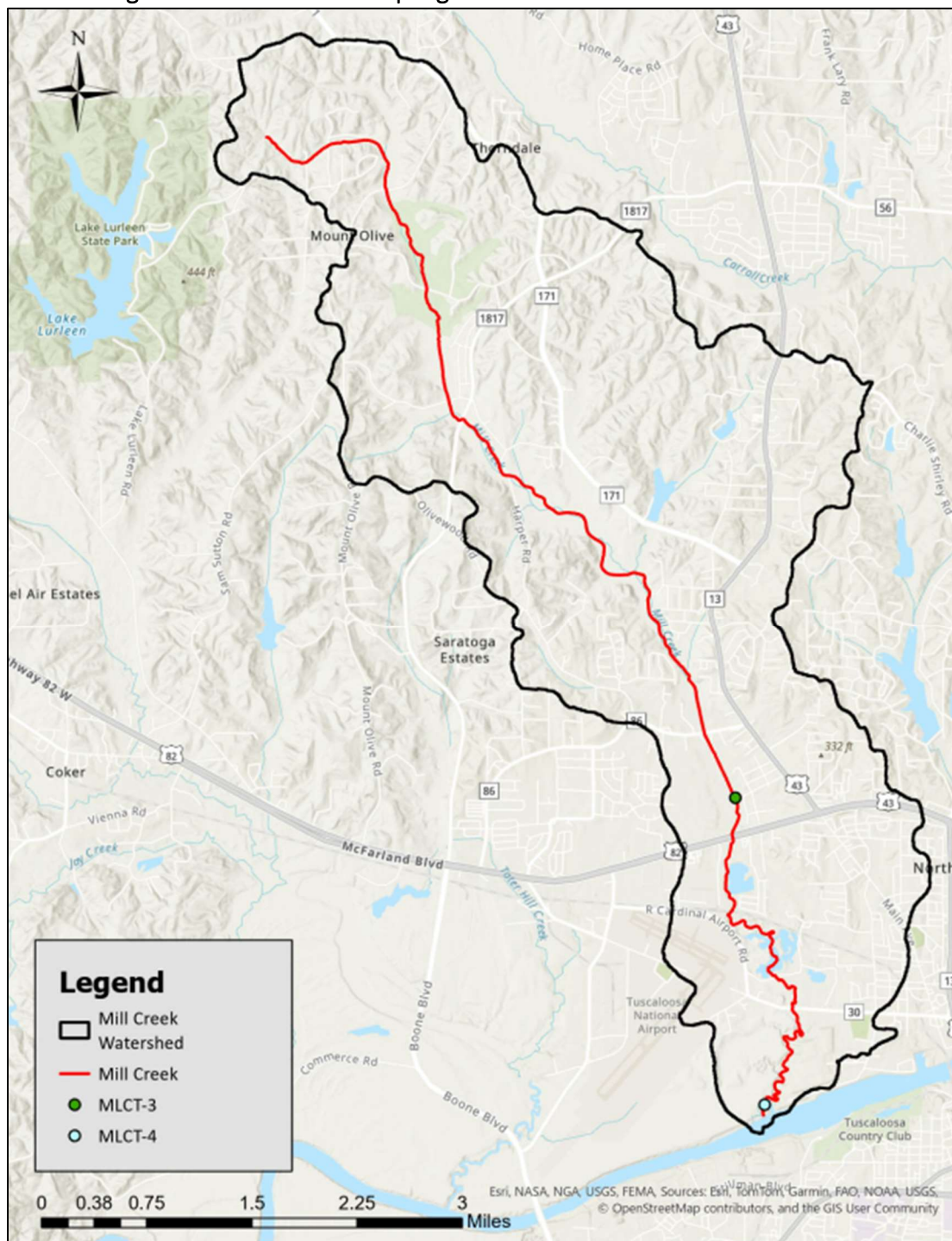


Table 7: 2024 *E. coli* Data for Mill Creek

Station ID	Sample Date	<i>E. coli</i> (col/100ml)	<i>E. coli</i> Detect Criteria *	Single Sample Criteria	Geometric Mean Calculation	Geometric Mean Criteria	Flow (cfs)
MLCT-3	3/13/2024	290.9	H	2507			12.33
MLCT-3	4/17/2024	517.2	H	2507			7.41
MLCT-3	5/22/2024	186	H	298			6.59
MLCT-3	6/5/2024	290.9		298	257.2	126	7
MLCT-3	6/10/2024	193.5		298			5.76
MLCT-3	6/17/2024	365.4		298			6.41
MLCT-3	6/18/2024	240	H	298			4.97
MLCT-3	6/25/2024	228.2		298			5.56
MLCT-3	6/28/2024	186		298			6.99
MLCT-3	7/17/2024	2419.6	GH	298			
MLCT-3	8/7/2024	1732.9		298	917.0	126	6.61
MLCT-3	8/12/2024	488.4		298			5.81
MLCT-3	8/15/2024	365.4		298			5.58
MLCT-3	8/21/2024	2419.6	GH	298			3.44
MLCT-3	8/26/2024	866.4		298			5.28
MLCT-3	9/5/2024	235.9		298		4.84	
MLCT-3	9/18/2024	547.5	H	298		5.87	
MLCT-3	10/23/2024	365.4	H	298		4.88	
MLCT-4	5/22/2024	14.8	H	298		13.38	
MLCT-4	6/18/2024	18.3	H	298		14.3	
MLCT-4	7/17/2024	18.3	H	298		14.45	
MLCT-4	8/21/2024	115.3	H	298		18.84	
MLCT-4	9/18/2024	56.5	H	298		11.39	
MLCT-4	10/23/2024	31.8	H	298		8.97	

*H – The analytical holding times for analysis are exceeded.

GH – The analytical holding times for analysis are exceeded. The actual number was probably greater than the number reported.

3.6 Critical Conditions/Seasonal Variation

Critical conditions typically occur during the summer months (May – October). This can be explained by the nature of storm events in the summer versus the winter. In summer, periods of dry weather interspersed with thunderstorms allow for the accumulation and washing off of bacteria into streams, resulting in spikes of bacteria counts. In winter, frequent low intensity rain events are more typical and do not allow for the build-up of bacteria on the land surface, resulting in a more uniform loading rate.

The impaired portion of Mill Creek generally follows the trends described above for the summer months of May through October. The critical condition for this pathogen TMDL was taken to be the highest single exceedance value. A single sample maximum concentration of 2419.6 was collected on July 17, 2024, at station MLCT-3. The use of the highest exceedance to calculate the TMDL is expected to be protective of water quality in Mill Creek year-round.

3.7 Margin of Safety

There are two methods for incorporating a Margin of Safety (MOS) in the TMDL 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 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 298 colonies/100 ml was reduced by 10% to 268.2 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 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:

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

The TMDL is the total amount of a pollutant that can be assimilated by the receiving waterbody while achieving water quality standards under critical conditions. Pathogen 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 Mill 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 in-stream 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 298 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 *E. coli* single sample exceedance concentration of 2419.6 colonies/100 ml by the measured flow on the day of the exceedance. The calculation for the existing condition was based on the measurement at MLCT-3 on July 17, 2024. The product of the concentration, measured flow, and a conversion factor gives the total mass loading (colonies per day) of *E. coli* to Mill Creek under the single sample exceedance condition.

$$\frac{16.18 \text{ ft}^3}{\text{s}} \times \frac{2419.6 \text{ colonies}}{100 \text{ ml}} \times \frac{24,465,755 * 100 \text{ ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{9.58 \times 10^{11} \text{ colonies}}{\text{day}}$$

The **geometric mean** mass loading was calculated by multiplying the highest geometric mean exceedance concentration of 917.0 colonies/100 ml times the average of the five measured stream flows. This concentration was calculated based on measurements at MLCT-3 between August 7, 2024, and August 26, 2024. The average stream flow was determined to be 5.34 cfs. The product of these two values times the conversion factor gives the total mass loading (colonies per day) of *E. coli* to Mill Creek under the geometric mean exceedance condition.

$$\frac{5.34 \text{ ft}^3}{\text{s}} \times \frac{917.0 \text{ colonies}}{100 \text{ ml}} \times \frac{24,465,755 * 100 \text{ ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.20 \times 10^{11} \text{ colonies}}{\text{day}}$$

The **point source** mass loading for the Northport WWTP (AL0064394) was calculated by multiplying the average discharge flow for the month of July 2024 (since this was when the highest exceedance occurred) by the maximum reported *E. coli* concentration for the same month and the conversion factor. The flow and *E. coli* concentrations were found on the July 2024 discharge monitoring report (DMR) submitted by the facility.

$$1.83 \text{ MGD} \times \frac{1.547 \text{ ft}^3}{\text{s} \times \text{MGD}} \times \frac{19 \text{ colonies}}{100 \text{ ml}} \times \frac{24,465,755 * 100 \text{ ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.32 \times 10^9 \text{ colonies}}{\text{day}}$$

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 measured flow for the violation event, the allowable concentration, and the conversion factor.

For the **single sample** *E. coli* target concentration of 268.2 colonies/100 ml, the allowable *E. coli* loading is:

$$\frac{16.18 \text{ ft}^3}{\text{s}} \times \frac{268.2 \text{ colonies}}{100 \text{ ml}} \times \frac{24,465,755 * 100 \text{ ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.06 \times 10^{11} \text{ colonies}}{\text{day}}$$

The explicit margin of safety of 29.8 colonies/100 ml equals a daily loading of:

$$\frac{16.18 \text{ ft}^3}{\text{s}} \times \frac{29.8 \text{ colonies}}{100 \text{ ml}} \times \frac{24,465,755 * 100 \text{ ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.18 \times 10^{10} \text{ colonies}}{\text{day}}$$

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

$$\frac{5.34 \text{ ft}^3}{\text{s}} \times \frac{113.4 \text{ colonies}}{100 \text{ mL}} \times \frac{24,465,755 * 100 \text{ mL} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.48 \times 10^{10} \text{ colonies}}{\text{day}}$$

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

$$\frac{5.34 \text{ ft}^3}{\text{s}} \times \frac{12.6 \text{ colonies}}{100 \text{ mL}} \times \frac{24,465,755 * 100 \text{ mL} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.65 \times 10^9 \text{ colonies}}{\text{day}}$$

The **point source** allowable loading was calculated by multiplying the design flow of the Northport WWTP by their *E. coli* daily maximum permit limitation of 298 colonies/100 ml and the conversion factor.

$$5.0 \text{ MGD} \times \frac{1.547 \text{ ft}^3}{\text{s} \times \text{MGD}} \times \frac{298 \text{ colonies}}{100 \text{ ml}} \times \frac{24,465,755 * 100 \text{ ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{5.64 \times 10^{10} \text{ colonies}}{\text{day}}$$

The difference between the existing conditions (violation event) and the allowable conditions converted to a percent reduction represents the total load reduction needed to achieve the *E. coli* water quality criteria. Table 8 below depicts the existing and allowable *E. coli* loads and required reductions for the Mill Creek watershed.

Table 8: *E. coli* Loads and Required Reductions for AL03160113-0201-100

Source	Existing Load (colonies/day)	Allowable Load (colonies/day)	Required Reduction (colonies/day)	% Reduction
Single Sample Load	9.58 x 10 ¹¹	1.06 x 10 ¹¹	8.52 x 10 ¹¹	89%
Geometric Mean Load	1.20 x 10 ¹¹	1.48 x 10 ¹⁰	1.05 x 10 ¹¹	88%
Point Source Load (Northport WWTP)	1.32 x 10 ⁹	5.64 x 10 ¹⁰	0	0%

The TMDL was calculated as the total daily *E. coli* load to Mill Creek as evaluated at station MLCT-3. From Table 8, compliance with single sample load criterion of 298 colonies/100 ml requires a reduction of 89% in the *E. coli* load. The TMDL, WLA, LA and MOS values necessary to achieve the applicable *E. coli* criteria are provided in Table 9 below.

Table 9: *E. coli* TMDL for Mill Creek

TMDL ^e	Margin of Safety (MOS)	Waste Load Allocation (WLA) ^a			Load Allocation (LA)	
		WWTPs ^b	Stormwater (MS4s and other NPDES sources) ^c	Leaking Collection Systems ^d		
(col/day)	(col/day)	(col/day)	% reduction	(col/day)	(col/day)	% reduction
1.18 x 10 ¹¹	1.18 x 10 ¹⁰	5.64 x 10 ¹⁰	89%	0	4.98 x 10 ¹⁰	89%

- a. There are no CAFOs in the Mill Creek watershed. Future CAFOs will be assigned a WLA of zero.
- b. WLA for WWTPs is expressed as a daily maximum. Current and future WWTPs must meet the applicable in-stream water quality criteria for pathogens at the point of discharge.
- c. Current and future MS4 areas and other NPDES stormwater sources will be required to demonstrate consistency with the assumptions and requirements of this TMDL through implementation and maintenance of BMPs on a case-by-case basis. For the purposes of this TMDL, the 89% reduction for MS4s and other stormwater sources should not be interpreted as a numeric permit limitation.
- 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 practical, 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 298 colonies/100 ml.

4.3 TMDL Summary

Mill Creek was first included on the §303(d) list for pathogens in 2018 based on data collected in 2012 at ADEM station MLCT-3. In 2024, sampling studies were performed by ADEM on Mill Creek to further assess the water quality of the impaired stream. ADEM collected eighteen *E. coli* samples from Mill Creek at station MLCT-3 and six samples from MLCT-4. A review of the general water quality and intensive *E. coli* studies revealed that Mill Creek was still not meeting the pathogen criteria applicable to its use classification (F&W).

The data collected by ADEM in 2024 confirmed the pathogen impairment and provided the basis for TMDL development. A mass balance approach was used to calculate the *E. coli* TMDL for Mill Creek. Based on the TMDL analysis, it was determined that an 89% reduction in *E. coli* loading was necessary to achieve compliance with applicable water quality standards.

Compliance with the terms and conditions of current 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 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 Mill Creek watershed. As additional data and/or information become 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 10.

Table 10: Follow-up Monitoring Schedule

River Basin Group	Years to be Monitored
Coosa, Escatawpa, Tennessee (Guntersville), Tombigbee	2025/2028
Alabama, Cahaba, Mobile, Tallapoosa, Tennessee (Pickwick and Wilson)	2026/2029
Black Warrior, Blackwater, Chattahoochee, Chipola, Choctawhatchee, Escambia, Perdido, Tennessee (Wheeler), Yellow	2027/2030

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 and subject TMDL were made available on ADEM’s website: www.adem.alabama.gov. In addition, the public notice was submitted to persons who requested to be on ADEM’s postal and electronic mailing distributions. 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 Appendices

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. 2012, 2107, 2024. ADEM.

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

Alabama's §303(d) List and Fact Sheet. 2018, 2020, 2022, 2024. 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 2017 Monitoring Data

Table 11. Monitoring Data at Stations MLCT-3 and MLCT-4

Station ID	Sample Date	E. Coli (col/100ml)	E. coli Detect Criteria *	Single Sample Criteria	Flow (cfs)
MLCT-3	3/20/2017	214.3	H	2507	7.01
MLCT-3	4/18/2017	285.1	H	2507	9.13
MLCT-3	5/10/2017	387.3	H	298	8.62
MLCT-3	6/14/2017	260.3	H	298	10.35
MLCT-3	7/18/2017	410.6	H	298	9.86
MLCT-3	8/1/2017	517.2	H	298	4.78
MLCT-3	9/20/2017	307.6	H	298	7.03
MLCT-3	10/4/2017	285.1	H	298	7.03
MLCT-4	3/20/2017	56.5	H	2507	16.87
MLCT-4	4/18/2017	2	H	2507	14.69
MLCT-4	5/10/2017	613.1	H	298	12.29
MLCT-4	6/14/2017	83.3	H	298	20.14
MLCT-4	7/18/2017	172.3	H	298	20.62
MLCT-4	8/1/2017	71.7	H	298	10.15
MLCT-4	9/20/2017	90.8	H	298	14.88
MLCT-4	10/4/2017	63.8	H	298	10.56

*H – The analytical holding times for analysis are exceeded.

7.3 Mill Creek Watershed Photos

Figure 6. At MLCT-3: Upstream View of Mill Creek (8/21/2024)



Figure 7. At MLCT-3: Downstream View of Mill Creek (8/21/2024)



Figure 8. At MLCT-4: Upstream View of Mill Creek (8/21/2024)



Figure 9. At MLCT-4: Downstream View of Mill Creek (8/21/2024)

