



***Draft***  
**Total Maximum Daily Load (TMDL)**  
**for**  
**Pauls Creek**

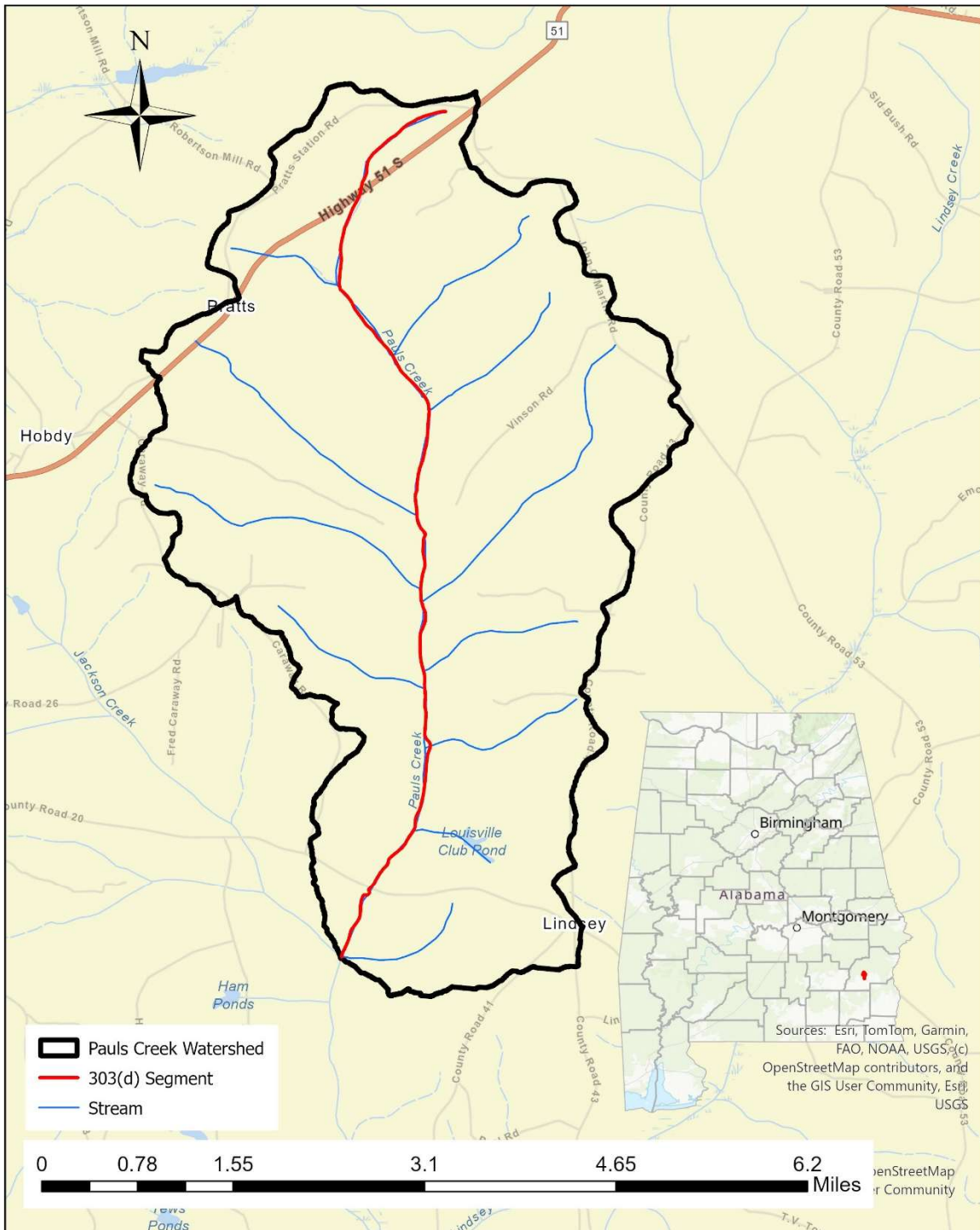
**Assessment Unit ID # AL03140201-0402-300**

**Pathogens (*E. coli*)**

**Barbour County**

Alabama Department of Environmental Management  
Water Quality Branch  
Water Division  
May 2026

**Figure 1: Pauls Creek Watershed**



<b><i>Table of Contents</i></b>		<b><i>Page</i></b>
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	Point Sources in the Pauls Creek Watershed	5
3.2.2	Nonpoint Sources in the Pauls Creek Watershed	6
3.3	Land Use Assessment	7
3.4	Linkage Between Numeric Targets and Sources	9
3.5	Data Availability and Analysis	9
3.6	Critical Conditions/Seasonal Variation	11
3.7	Margin of Safety	12
4.0	TMDL Development	13
4.1	Definition of a TMDL	13
4.2	Load Calculations	13
4.3	TMDL Summary	15
5.0	Follow-up Monitoring	17
6.0	Public Participation	17
7.0	Appendices	18
7.1	References	18
7.2	Water Quality Data	19
7.3	Pauls Creek Watershed Photos (March 24, 2026)	20

## ***List of Figures***

Figure 1	Pauls Creek Watershed	ii
Figure 3-1	Land Use Map for the Pauls Creek Watershed	7
Figure 3-2	Graph of Primary Land Uses in the Pauls Creek Watershed	8
Figure 3-3	Map of ADEM Sampling Station on Pauls Creek	10

## ***List of Tables***

Table 1-1	<i>E. coli</i> Loads and Required Reductions	2
Table 1-2	<i>E. coli</i> TMDL for Pauls Creek	2
Table 3-1	Land Use Areas for the Pauls Creek Watershed	8
Table 3-2	Pauls Creek Sampling Station Description	9
Table 3-3	2024 <i>E. coli</i> Data for the Pauls Creek Watershed	11
Table 4-1	<i>E. coli</i> Loads and Required Reductions	15
Table 4-2	<i>E. coli</i> TMDL for Pauls Creek	15
Table 5-1	Follow-up Monitoring Schedule	17
Table 7-1	ADEM Pathogen Data Collected on Pauls Creek	19

## ***List of Photos***

Photo 7-1	Pauls Creek at PLSB-1 (County Road 20), Looking Upstream	20
Photo 7-2	Pauls Creek at PLSB-1 (County Road 20), Looking Downstream	20
Photo 7-3	Pauls Creek at State Highway 51, Looking Upstream	21
Photo 7-4	Pauls Creek at State Highway 51, Looking Downstream	21

## 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).

Pauls Creek is currently included on Alabama's §303(d) list for pathogens (*E. coli*) from its source to West Fork Choctawhatchee River. Pauls Creek forms south of the town of Clayton and is part of the Choctawhatchee River Basin. It flows south through Barbour County and into West Fork Choctawhatchee River. The total length of Pauls Creek is 7.59 miles, and the total drainage area of the Pauls Creek watershed is approximately 16.86 square miles. Pauls Creek has a use classification of Fish & Wildlife (F&W).

Pauls Creek was first included on the §303(d) list for pathogens in 2018 based on ADEM monitoring data collected in 2014 at station PLSB-1. Pauls Creek has subsequently been listed on the 2020, 2022 and 2024 §303(d) lists of impaired waterbodies.

In 2024, sampling studies were performed by ADEM 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 Pauls Creek because it provides the best picture of the current water quality of the stream. The 2026 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 PLSB-1. This bacterial data is listed in Appendix 7.2, Table 7-1 for reference. ADEM collected 14 *E. coli* samples and conducted two geometric mean studies on Pauls Creek in 2024. According to the data, Pauls Creek was not meeting the pathogen criteria applicable to its use classification of F&W. 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 Pauls 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 November through April single sample *E. coli* target of 2256.3 colonies/100 ml (2507 colonies/100 ml – 10% Margin of Safety), May through October single sample *E. coli* target of 268.2 colonies/100 ml (298 colonies/100 ml – 10% Margin of Safety), and May through October 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 geometric mean *E. coli* exceedance at station PLSB-1 (October 3, 2024 – October 23, 2024) with a value of 156.9 colonies/100 ml. This violation calls for a reduction of 28%.

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

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

Source	Existing Load (colonies/day)	Allowable Load (colonies/day)	Required Reduction (colonies/day)	% Reduction
Single Sample Load	1.36E+12	1.01E+12	3.45E+11	25%
Geometric Mean Load	1.19E+10	8.60E+9	3.30E+9	28%

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

TMDL <sup>e</sup>	Margin of Safety (MOS)	Waste Load Allocation (WLA) <sup>a</sup>			Load Allocation (LA)	
		WWTPs <sup>b</sup>	Stormwater (MS4s and other NPDES sources) <sup>c</sup>	Leaking Collection Systems <sup>d</sup>		
(col/day)	(col/day)	(col/day)	(% reduction)	(col/day)	(col/day)	(% reduction)
9.56E+9	9.56E+8	NA	NA	0	8.60E+9	28%

Note: NA = not applicable

a. Current and 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 and other NPDES stormwater sources would 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.

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 geometric mean criterion of 126 colonies/100ml.

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 Pauls 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 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 7.59 miles of Pauls Creek as impaired for pathogens. The §303(d) listing for pathogens was originally reported on Alabama’s 2018 List of Impaired Waters based on 2014 ADEM monitoring data from station PLSB-1 and was subsequently included on the 2020, 2022, and 2024 lists. The potential sources of the impairment on the 2024 §303(d) list are animal feeding operations and pasture grazing.

### 2.2 Problem Definition

<u>Waterbody Impaired:</u>	Pauls Creek – From West Fork Choctawhatchee River to its source
<u>Impaired Reach Length:</u>	7.59 miles
<u>Impaired Drainage Area:</u>	16.86 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>	Fish and Wildlife

#### Usage Related to Classification:

The impaired stream segment 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 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 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:

Pauls Creek was first included on the §303(d) list for pathogens in 2018 based on ADEM's 2014 *E. coli* data from station PLSB-1. Of the eight *E. coli* samples collected at station PLSB-1 in 2014, two violated the applicable single sample maximum criterion. 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 2256.3 colonies/100 ml will be used for samples collected during November through April. This target was derived by using a 10% explicit margin of safety from the single sample maximum criterion of 2507 colonies/100 ml that is applicable during the months of November through April. A single sample *E. coli* target of 268.2 colonies/100 ml, derived by using a 10% explicit margin of safety from the May through October single sample maximum criterion of 298 colonies/100 ml, will be used for samples collected during May through October. These targets are 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 during May through October. This target was also derived by using a 10% explicit margin of safety from the applicable 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 Pauls 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 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 Pauls Creek watershed. In addition, the Pauls 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.

Currently, there are five Animal Feeding Operations/Concentrated Animal Feeding Operations (AFOs/CAFOs) located within the Pauls Creek watershed. AFOs/CAFOs are required to implement and maintain effective best management practices (BMPs) that meet or exceed Natural Resources Conservation Service (NRCS) technical standards and guidelines, and the ADEM AFO/CAFO rules currently prohibit discharges of pollutants from these facilities and their associated land application activities. As a result, current and future AFOs/CAFOs will receive a wasteload allocation of zero.

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 a review of the Department’s records, it was found that no SSOs have been reported in the Pauls Creek watershed in recent years.

There are currently no registered sites in the Pauls 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.

### **3.2.2 Nonpoint Sources in the Pauls 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 Pauls Creek watershed. Land use in this watershed is primarily forested/natural (80.66%) along with some agriculture and developed land (15.48% and 3.26%, 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.

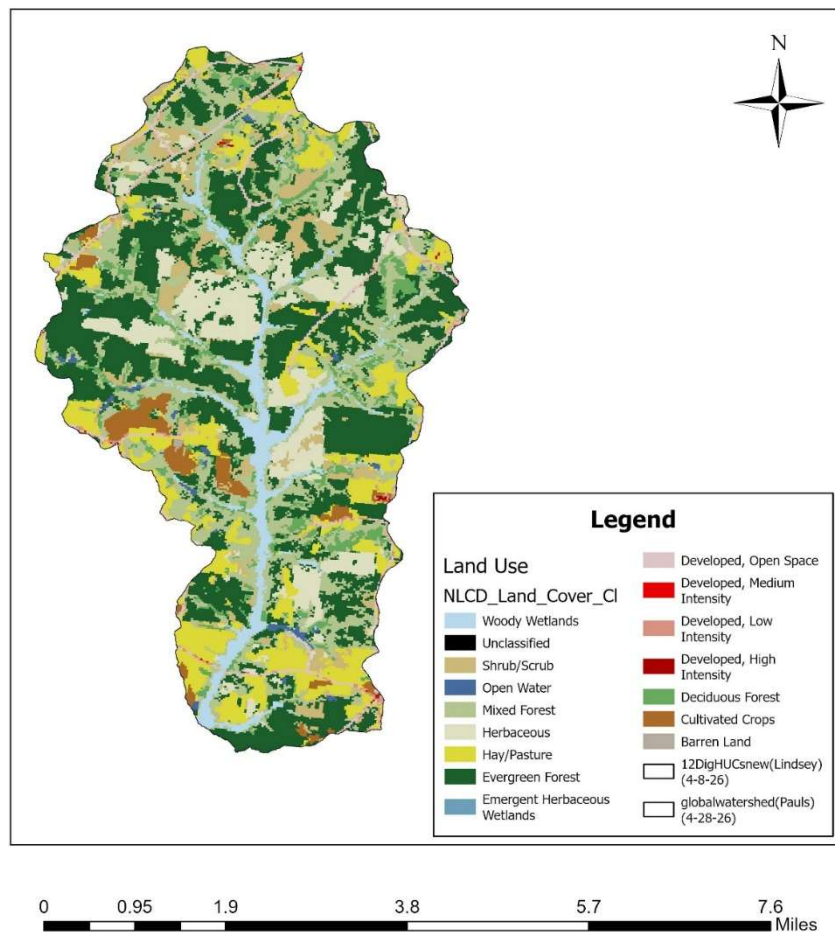
*E. coli* loading from urban areas is potentially attributable to multiple sources including storm water runoff, unpermitted discharges of wastewater, runoff from improper disposal of waste materials, failing septic tanks, and domestic animals. Septic systems may be direct or indirect sources of bacterial 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 Pauls 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 Pauls Creek watershed. Figure 3-2 is a graph depicting the primary land uses in the Pauls Creek watershed.

The majority of the Pauls Creek watershed is forested/natural (80.66%). Other land uses include agriculture (15.48%), developed land (3.26%), and open water (0.59%). Developed land includes both commercial and residential land uses. 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.

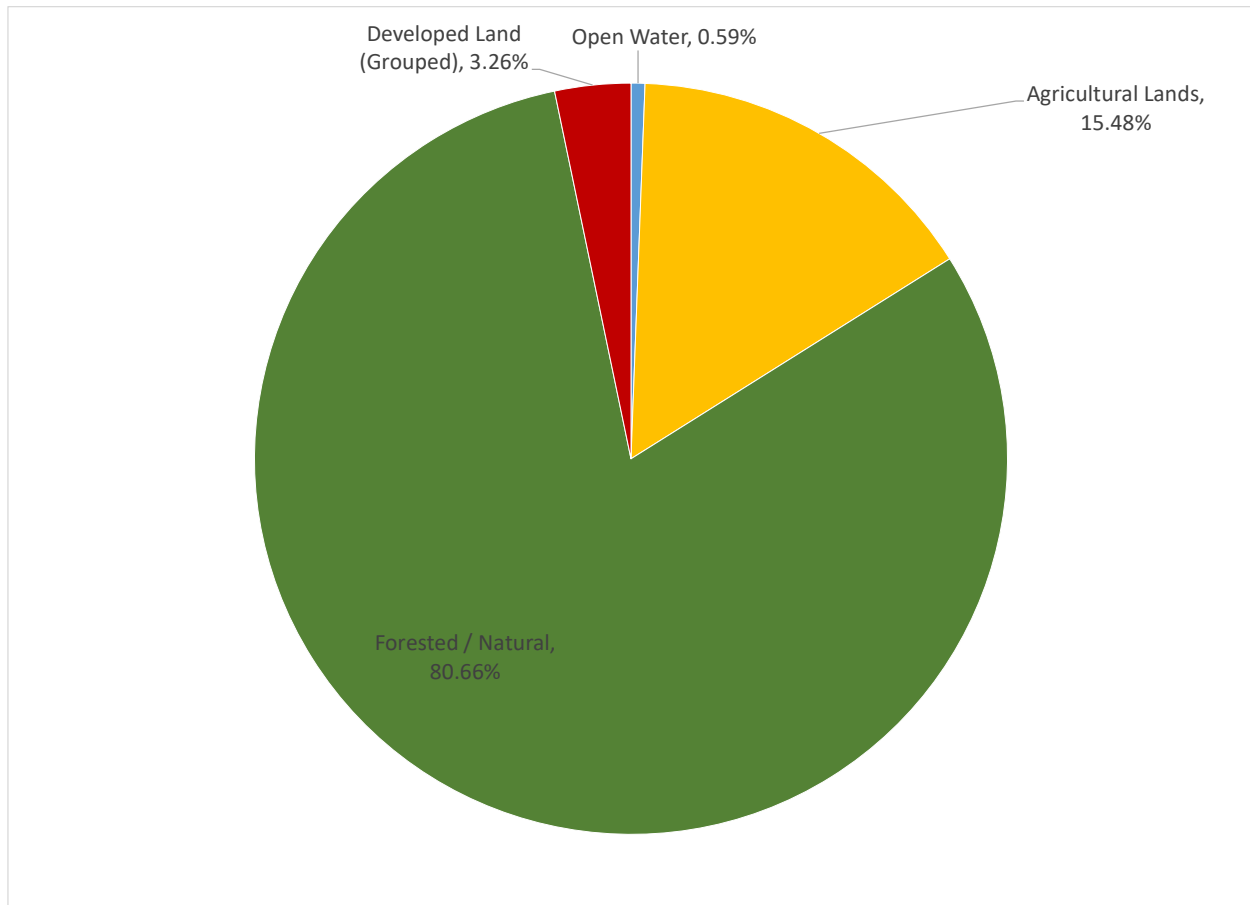
**Figure 3-1. Land Use Map for the Pauls Creek Watershed**



**Table 3-1. Land Use Areas for the Pauls Creek Watershed**

<b>Class Description</b>	<b>Mi<sup>2</sup></b>	<b>Acres</b>	<b>Percent</b>
Open Water	0.10	64.00	0.59%
Agricultural Lands	2.61	1670.40	15.48%
Forested / Natural	13.60	8704.00	80.66%
Developed Land (Grouped)	0.55	352.00	3.26%
<b>TOTALS →</b>	<b>16.86</b>	<b>10790.40</b>	<b>100.00%</b>

**Figure 3-2. Graph of Primary Land Uses in the Pauls Creek Watershed**



### 3.4 *Linkage Between Numeric Targets and Sources*

The Pauls 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 Pauls Creek are from the agricultural land uses and possibly leaking or 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.

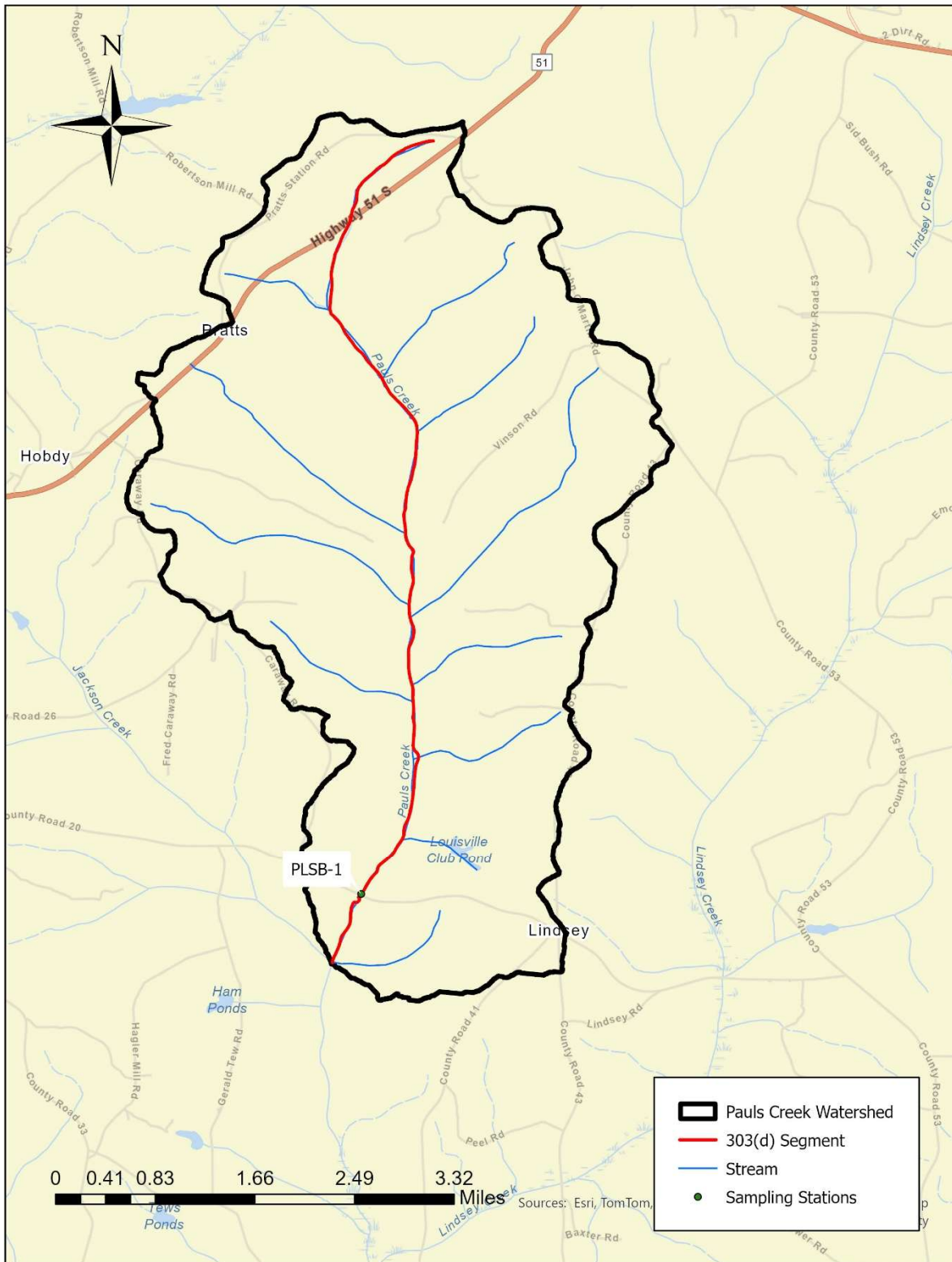
### 3.5 *Data Availability and Analysis*

In 2024, ADEM collected water quality data on Pauls Creek at station PLSB-1. Table 3-2 and Figure 3-3 display the description and location for the ADEM sampling station. As previously mentioned, the 2024 data will be used for this TMDL. The January 2026 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. Pauls Creek Sampling Station Description**

<b>ADEM Station</b>	<b>Station Location</b>	<b>Latitude</b>	<b>Longitude</b>
PLSB-1	Pauls Creek at Barbour County Road 20	31.76225	-85.49271

**Figure 3-3. Map of ADEM Sampling Station on Pauls Creek**



Of the 14 *E. coli* samples collected at station PLSB-1 during 2024, two violated the applicable single sample maximum criterion; one violated the May – October single sample maximum criterion of 298 col/100 ml and one violated the November – April single sample maximum criterion of 2507 col/100 ml for the F&W use classification. In addition, there were exceedances of the applicable geometric mean criterion of 126 col/100 ml at station PLSB-1 in May/June 2024 and October 2024. This data can be viewed in Table 3-3 below and in Appendix 7.2, Table 7-1.

**Table 3-3. 2024 *E. coli* Data for the Pauls Creek Watershed**

Station ID	Date	<i>E. coli</i> (col/100ml)	<i>E. coli</i> dc*	<i>E. coli</i> Criterion (col/100ml)	<i>E. coli</i> Geometric Mean (col/100ml)	<i>E. coli</i> Geometric Mean Criterion (col/100ml)
PLSB-1	3/13/2024	172.5		2507		
PLSB-1	4/3/2024	3024.5	G	2507		
PLSB-1	5/8/2024	112.6		298	147.2	126
PLSB-1	5/23/2024	181		298		
PLSB-1	5/24/2024	285		298		
PLSB-1	5/31/2024	181.6		298		
PLSB-1	6/6/2024	65.5		298		
PLSB-1	7/11/2024	307.6		298		
PLSB-1	8/7/2024	248.9		298		
PLSB-1	10/3/2024	248.1		298	156.9	126
PLSB-1	10/8/2024	151.5		298		
PLSB-1	10/10/2024	88.2		298		
PLSB-1	10/11/2024	160.7		298		
PLSB-1	10/23/2024	178.5		298		

\*G = The actual number was probably greater than the number reported.

### 3.6 Critical Conditions/Seasonal Variation

Critical conditions typically occur during the summer months. 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 *E. coli* bacteria into streams, resulting in spikes of *E. coli* bacteria counts. In winter, frequent low intensity rain events are more typical and do not allow for the build-up of *E. coli* bacteria on the land surface, resulting in a more uniform loading rate.

Pauls 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 one with the highest *E. coli* geometric mean exceedance value. That value was 156.9 colonies/100 ml and occurred during October 3, 2024, through October 23, 2024, at station PLSB-1. An average flow of 3.1 cfs was calculated for this sampling event. The use of the highest exceedance to calculate the TMDL is expected to be protective of water quality in Pauls 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 or calculated flow data. The November through April single sample *E. coli* maximum value of 2507 colonies/100 ml was reduced by 10% to 2256.3 colonies/100 ml and the May through October single sample *E. coli* maximum value of 298 colonies/100 ml was reduced by 10% to 268.2 colonies/100 ml, while the May through October 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:

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

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 Pauls Creek. The mass balance approach utilizes the conservation of mass principle. Total mass loads can be calculated by multiplying the *E. coli* concentrations times the instream flows times a conversion factor. Existing loads were calculated for the highest single sample exceedance and the highest geometric mean exceedance. In the same manner, allowable loads were calculated for both the single sample criterion of 2507 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 3024.5 colonies/100 ml times the measured flow at the time the sample was collected. This concentration was measured at PLSB-1 on April 3, 2024. The stream flow was 18.33 cfs at the time of the violation. The product of these two values and the conversion factor gives the total mass loading (colonies per day) of *E. coli* to Pauls Creek under the single sample exceedance condition.

$$\frac{18.33 \text{ ft}^3}{\text{s}} \times \frac{3024.5 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.36 \times 10^{12} \text{ colonies}}{\text{day}}$$

The **geometric mean** mass loading was calculated by multiplying the highest geometric mean exceedance concentration of 156.9 colonies/100 ml times the average of the stream flows measured or estimated during the geometric mean sampling period. This concentration was calculated based on measurements at PLSB-1 between October 3, 2024, and October 23, 2024, which are shown above in Table 3-3. The average stream flow was determined to be 3.1 cfs. The product of these two values and the conversion factor gives the total mass loading (colonies per day) of *E. coli* to Pauls Creek under the geometric mean exceedance condition.

$$\frac{3.1 \text{ ft}^3}{\text{s}} \times \frac{156.9 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.19 \times 10^{10} \text{ colonies}}{\text{day}}$$

**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 2256.3 colonies/100 ml, the allowable *E. coli* loading is:

$$\frac{18.33 \text{ ft}^3}{\text{s}} \times \frac{2256.3 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.01 \times 10^{12} \text{ colonies}}{\text{day}}$$

The explicit margin of safety of 250.7 colonies/100 ml equals a daily loading of:

$$\frac{18.33 \text{ ft}^3}{\text{s}} \times \frac{250.7 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{1.12 \times 10^{11} \text{ colonies}}{\text{day}}$$

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

$$\frac{3.1\text{ft}^3}{\text{s}} \times \frac{113.4 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{8.60 \times 10^9 \text{ colonies}}{\text{day}}$$

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

$$\frac{3.1\text{ft}^3}{\text{s}} \times \frac{12.6 \text{ colonies}}{100\text{ml}} \times \frac{24,465,755 \text{ 100ml} * \text{s}}{\text{ft}^3 * \text{day}} = \frac{9.56 \times 10^8 \text{ colonies}}{\text{day}}$$

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 Pauls Creek as evaluated at station PLSB-1. Table 4-1 shows the existing and allowable *E. coli* loads and required reductions for the Pauls Creek watershed.

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

Source	Existing Load (colonies/day)	Allowable Load (colonies/day)	Required Reduction (colonies/day)	% Reduction
Single Sample Load	1.36E+12	1.01E+12	3.45E+11	25%
Geometric Mean Load	1.19E+10	8.60+9	3.30E+9	28%

From Table 4-1, compliance with the geometric mean criterion of 126 colonies/100 ml requires a reduction in the *E. coli* load of 28%. 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 Pauls Creek**

TMDL <sup>e</sup>	Margin of Safety (MOS)	Waste Load Allocation (WLA) <sup>a</sup>			Load Allocation (LA)	
		WWTPs <sup>b</sup>	Stormwater (MS4s and other NPDES sources) <sup>c</sup>	Leaking Collection Systems <sup>d</sup>		
(col/day)	(col/day)	(col/day)	(% reduction)	(col/day)	(col/day)	(% reduction)
9.56E+9	9.56E+8	NA	NA	0	8.60E+9	28%

Note: NA = not applicable

a. Current and 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 and other NPDES stormwater sources would 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.

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 geometric mean criterion of 126 colonies/100ml.

### 4.3 TMDL Summary

Pauls Creek was first included on the §303(d) list for pathogens in 2018 based on ADEM’s 2014 *E. coli* data from station PLSB-1. In 2024, 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 Pauls Creek. Based on the TMDL analysis, it was determined that a 28% 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 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 Pauls 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 5-1.

**Table 5-1. Follow-up Monitoring Schedule**

<b>River Basin Group</b>	<b>Years to be Monitored</b>
Alabama, Cahaba, Mobile, Tallapoosa, Tennessee (Pickwick and Wilson)	2026/2029
Black Warrior, Blackwater, Chattahoochee, Chipola, Choctawhatchee, Escambia, Perdido, Tennessee (Wheeler), Yellow	2027/2030
Coosa, Escatawpa, Tennessee (Guntersville), Tombigbee	2028/2031

## 6.0 *Public Participation*

As part of the public participation process, this TMDL will be placed on public notice and made available for review and comment. The public notice and subject TMDL will be made available on ADEM’s website: [www.adem.alabama.gov](http://www.adem.alabama.gov). In addition, the public notice will be submitted to persons who have requested to be on ADEM’s postal and electronic mailing distributions. The public may also request paper or electronic copies of the TMDL by contacting Ms. Kimberly Minton at 334-271-7826 or [kminton@adem.alabama.gov](mailto:kminton@adem.alabama.gov). The public will be 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 will become part of the administrative record. ADEM will consider 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, 2025. Water Division - Water Quality Program, Chapter 335-6-10, Water Quality Criteria.

ADEM Administrative Code, 2025. Water Division - Water Quality Program, Chapter 335-6-11, Use Classifications for Interstate and Intrastate Waters.

Alabama's Monitoring Program. 2014 & 2024. ADEM.

Alabama Department of Environmental Management (ADEM), *Alabama's Water Quality Assessment and Listing Methodology*, January 2026.

Alabama Department of Environmental Management, 2018, 2020, 2022 & 2024 §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. ADEM Pathogen Data Collected on Pauls Creek**

Station ID	Date	Flow (cfs)	<i>E. coli</i> (col/100 ml)	<i>E. coli</i> dc*	<i>E. coli</i> Geometric Mean (col/100 ml)
PLSB-1	3/13/2014	20.09	98.5		
PLSB-1	4/2/2014	25.981	218.7		
PLSB-1	5/15/2014		437.4		
PLSB-1	6/4/2014	14.2413	139.6		
PLSB-1	7/1/2014	7.4416	93.3		
PLSB-1	8/6/2014	3.6216	150		
PLSB-1	9/3/2014	1.8434	119.8		
PLSB-1	10/8/2014	3.2084	456.9		
PLSB-1	3/13/2024	15.08	172.5		
PLSB-1	4/3/2024	18.33	3024.5	G	
PLSB-1	5/8/2024	2.313	112.6		147.2
PLSB-1	5/23/2024	10.51	181		
PLSB-1	5/24/2024	9.808	285		
PLSB-1	5/31/2024	7.11	181.6		
PLSB-1	6/6/2024	5.777	65.5		
PLSB-1	7/2/2024	2.532			
PLSB-1	7/11/2024	1.902	307.6		
PLSB-1	8/7/2024		248.9		
PLSB-1	10/3/2024	6.94**	248.1		156.9
PLSB-1	10/8/2024	3.449	151.5		
PLSB-1	10/10/2024	2.227	88.2		
PLSB-1	10/11/2024	1.972	160.7		
PLSB-1	10/23/2024	0.913	178.5		

\*G = The actual number was probably greater than the number reported.

\*\*Flow was measured but the data was lost; therefore, flow was estimated using the drainage area ratio method with data from USGS gauge 02342937.

### **7.3 Pauls Creek Watershed Photos (March 24, 2026)**

**Photo 7-1 Pauls Creek at PLSB-1 (County Road 20), Looking Upstream**



**Photo 7-2 Pauls Creek at PLSB-1 (County Road 20), Looking Downstream**



**Photo 7-3 Pauls Creek at State Highway 51, Looking Upstream**



**Photo 7-4 Pauls Creek at State Highway 51, Looking Downstream**

