

Kellogg Creek TMDL Implementation Plan Narrative

Background and Purpose

Kellogg Creek is in the Coosa river Basin and is a tributary to Lake Allatoona. A three mile segment from _____ to _____ was listed on the 303(d) list of the State of Georgia for violating the water quality standard for fecal coliform bacteria. Fecal coliform bacteria is bacteria found in the intestinal tract of humans and animals. Its presence in streams, rivers and lakes is an indicator of possible harmful pathogens.

For each waterbody on the 303(d) list, the U.S. Clean Water Act requires a TMDL or Total Maximum Daily Load be developed for each pollutant. A TMDL is a calculation of the maximum amount of a pollutant, from both point and non-point sources, that a waterbody can receive and still meet water quality standards. The U.S. EPA developed a TMDL for Kellogg Creek that when updated by EPA and EPD for 1994 land use, showed that a reduction from urban sources of pollution was needed.

The purpose of this implementation plan is to reduce or eliminate the sources of fecal coliform bacteria draining to the Kellogg Creek in order to meet the fecal coliform water quality standard.

TMDL Data and Potential Sources of Pollution

Kellogg Creek was listed on Georgia's 303(d) list due to samples collected as part of the Lake Allatoona Phase I – Clean Lakes Feasibility Study by Kennesaw State from June 1992 to August 1993. There were 12 monthly samples for fecal coliform of which 2 samples exceeded the maximum 4,000 cfu/100ml allowed for any sample. Insufficient samples were obtained to compare to the standard for the 30-day average.

The Kellogg Creek watershed is

Plan Preparation

Describe the organization which prepared the plan and, if appropriate, how they were selected or appointed to do the plan, any known public meetings between the organization preparing the plan and the local government(s) or other organizations, and any public actions taken to approve the plan. Note any stakeholder involvement in the preparation of the implementation plan or involvement in an ongoing watershed assessment and/or note the time-frame when stakeholder involvement in the process will begin.

Regulatory and Voluntary Measures: Existing and Future

Cherokee County and the Cherokee Water and Sewerage Authority have already undertaken a number of measures to improve water quality and reduce bacteria in streams since the Clean Lakes sampling was conducted.

The County adopted an Undisturbed Stream Buffer Ordinance in 1998 that requires 50' on primary and secondary streams including Kellogg Creek. The County adopted a Tree Preservation Ordinance in 1999. The County Health Department enforces the Septic System Code updated in January 2001.

The Cherokee Water and Sewerage Authority is also addressing a source of fecal coliform bacteria which is suspected as a major contributor to the problem in Kellogg Creek. The Authority is installing public sewerage in the watershed and this is allowing Oak Grove School to eliminate its wastewater discharge to the creek. It is possible that this action may achieve the reduction needed for this TMDL.

The Cherokee Water and Sewerage Authority is conducting a Watershed Assessment of an area that includes Kellogg Creek and its watershed. The Watershed Assessment is called the Little River Watershed Assessment. Water quality monitoring data is being collected as part of the Assessment. Also, this Watershed Assessment established a stakeholders committee that has and will serve the purpose of a stakeholders group for this implementation plan. The stakeholders committee has met _____ times to review monitoring data and discuss potential sources of pollution. The Watershed Assessment has produced a number recommendations that are being considered and could serve to contribute to the goals of this TMDL Implementation Plan as well. Examples of these recommendations include:

- Monitoring to verify effectiveness of measures implemented.
- Review of all existing development codes, ordinances, and policies to identify where revisions could be made to reduce non-point source water pollution.
- Design and implement a citizen education program to make citizens aware of the non-point source water pollution problem and their role in improving the water quality.
- Encourage the formation of volunteer groups to conduct community based stream protection efforts such as restoring vegetative cover within riparian areas, stream clean-up, and reporting of problems.
- Conduct screening level analyses of structural and non-structural BMPs.
- Investigate grant and funding opportunities to fund these efforts.

Cherokee County is planning to develop a NPDES Phase II Municipal Stormwater Permit Program. The measures included in this program are: public education and participation, illicit discharge detection and elimination, construction site runoff control, post construction runoff control, and pollution prevention. The Phase II Municipal Stormwater Program is planned to be in place by 2003.

Schedule for Implementation

This plan provides for the implementation over a five year timeframe. During the first year the stakeholder committee will work together to continue to identify sources of the problem, identify remedial measures and potential funding sources. Monitoring will also be implemented in the first year to document any improvements or continued problems with fecal coliform levels. Any illicit discharges will also be eliminated as soon as possible when detected. Additional management measures will be reviewed and considered in year two. Monitoring and evaluation of data will continue throughout the 5 year plan. Periodic status reports will begin in year three. Education programs will be implemented in year three to coincide with the program required under the NPDES MS4 Permit.

Monitoring Plan

The Cherokee County Water & Sewerage Authority has generated approximately 20 data points for fecal coliform numbers in Kellogg Creek since October 1999 as part of the Little River Watershed Assessment. CCWSA plans to continue monitoring fecal coliform in Kellogg Creek at least 8 times per year for the next 5 years as part of the On-going Monitoring Plan for the Assessment. CCWSA may also conduct special focused studies in the Kellogg Creek watershed to evaluate fecal coliform numbers relative to water quality standards (i.e., sample four times within a 30-day period as specified in the water quality regulations).

Funding

Conclusion