NEWMYER RUN WATERSHED FINAL TMDL Fayette County

Prepared for:

Pennsylvania Department of Environmental Protection



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¹Final TMDL Newmyer Run Watershed Fayette County, Pennsylvania

Introduction

This report presents the Total Maximum Daily Loads (TMDLs) developed for stream segments in the Newmyer Run Watershed (Attachment A). These were done to address the impairments noted on the 1996 Pennsylvania Section 303(d) list of impaired waters, required under the Clean Water Act, and covers one segment on this list (shown in Table 1). In 1998 the watershed was reassessed and the 1996 segment was included in the new segment. High levels of metals caused these impairments. All impairments resulted from acid drainage from abandoned coalmines. The TMDL addresses the three primary metals associated with acid mine drainage (iron, manganese, aluminum), and pH.

			T	able 1. 303	B(d) Sub-List	t		
		State Wa	ter Plan (SWP) Sub	basin: 19-E l	Poplar Run B	asin	
Year	Miles	Segment ID	DEP Stream Code	Stream Name	Designated Use	Data Source	Source	EPA 305(b) Cause Code
1996	0.5	4755	38307	Newmyer Run	CWF	305(b) Report	RE	Metals
1998	0.54	4755	38307	Newmyer Run	CWF	SWMP	AMD	Metals
2002	6.6	New survey; new id. 980727- 1325-ALF	38307	Newmyer Run	CWF	SWMP	AMD	Metals

Resource Extraction=RE Cold Water Fishes=CWF Surface Water Monitoring Program = SWMP Abandoned Mine Drainage = AMD See Attachment E, *Excerpts Justifying Changes Between the 1996, 1998 and Draft 2000 Section 303(d) Lists.* The use designations for the stream segments in this TMDL can be found in PA Title 25 Chapter 93.

Directions to the Newmyer Run Watershed

The Newmyer Run Watershed is located in southwestern Pennsylvania, occupying a small section of the northeastern corner of Fayette County. The watershed is found on the United States Geological Survey Map of Donegal 7.5-minute Quadrangle. From Donegal, exit the Pennsylvania Turnpike and follow State Route 31 toward Mt. Pleasant 3./10 of a mile to S.R.

¹ Pennsylvania's 1996, 1998, and 2002 Section 303(d) lists were approved by the Environmental Protection Agency (EPA). The 1997 Section 303(d) list provides the basis for measuring progress under the 1996 lawsuit settlement of *American Littoral Society and Public Interest Group of Pennsylvania v. EPA*.

2029, follow S.R. 2029 to S.R. 1050 to the village of White. At the intersection of S.R. 1050 and S.R. 1009, turn left onto S.R. 1009. Newmyer Run will be located on your right as you travel south on S.R. 1009. Newmyer Run ends at the intersection of S.R. 1009 and S.R. 1054 where it meets Poplar Run.

Segments addressed in this TMDL

There are three active mining permits in the Newmyer Run Watershed. The Amerikohl Mining, Inc. (SMP26000101) "Keslar Strip" has two sediment ponds that rarely discharge. These ponds are being removed in late spring or early summer of 2003. There is no flow data available for these ponds. Because of the lack of flow data and the anticipated removal of the ponds, no waste load allocation will be assigned. A second active mining permit, Purco Coal Co., Inc. (SMP26703078) "Layman Strip", is currently in the bond release stage. There is no flow data available for the discharge. Due to lack of flow data and the completion of mining activities, no waste load allocation is assigned. According to Department Mine Inspectors, both sites have been reclaimed and have good water quality. The third active permit is the Amerikohl Mining, Inc. (SMP 26010101) "Knopsnider Strip". There are two permitted discharges from the site for which waste load allocations are calculated. The remaining discharges in the watershed are from abandoned mines and will be treated as non-point sources. The distinction between non-point and point sources in this case is determined on the basis of whether or not there is a responsible party for the discharge. Where there is no responsible party the discharge is considered to be a non-point source. Each segment on the Section 303(d) list will be addressed as a separate TMDL. These TMDLs will be expressed as long-term, average loadings. Due to the nature and complexity of mining effects on the watershed, expressing the TMDL as a long-term average gives a better representation of the data used for the calculations. See Attachment D for TMDL calculations.

Clean Water Act Requirements

Section 303(d) of the 1972 Clean Water Act requires states, territories, and authorized tribes to establish water quality standards. The water quality standards identify the uses for each waterbody and the scientific criteria needed to support that use. Uses can include designations for drinking water supply, contact recreation (swimming), and aquatic life support. Minimum goals set by the Clean Water Act require that all waters be "fishable" and "swimmable."

Additionally, the federal Clean Water Act and the U.S. Environmental Protection Agency's (USEPA) implementing regulations (40 CFR Part 130) require:

• States to develop lists of impaired waters for which current pollution controls are not stringent enough to meet water quality standards (the list is used to determine which streams need TMDLs);

- States to establish priority rankings for waters on the lists based on severity of pollution and the designated use of the waterbody; states must also identify those waters for which TMDLs will be developed and a schedule for development;
- States to submit the list of waters to USEPA every two years (April 1 of the even numbered years);
- States to develop TMDLs, specifying a pollutant budget that meets state water quality standards and allocate pollutant loads among pollution sources in a watershed, e.g., point and nonpoint sources; and
- USEPA to approve or disapprove state lists and TMDLs within 30 days of final submission.

Despite these requirements, states, territories, authorized tribes, and USEPA have not developed many TMDLs since 1972. Beginning in 1986, organizations in many states filed lawsuits against the USEPA for failing to meet the TMDL requirements contained in the federal Clean Water Act and its implementing regulations. While USEPA has entered into consent agreements with the plaintiffs in several states, many lawsuits still are pending across the country.

In the cases that have been settled to date, the consent agreements require USEPA to backstop TMDL development, track TMDL development, review state monitoring programs, and fund studies on issues of concern (e.g., AMD, implementation of nonpoint source Best Management Practices (BMPs), etc.). These TMDLs were developed in partial fulfillment of the 1997 lawsuit settlement of *American Littoral Society and Public Interest Group of Pennsylvania v. EPA*.

Section 303(d) Listing Process

Prior to developing TMDLs for specific waterbodies, there must be sufficient data available to assess which streams are impaired and should be on the Section 303(d) list. With guidance from the USEPA, the states have developed methods for assessing the waters within their respective jurisdictions.

The primary method adopted by the Pennsylvania Department of Environmental Protection (Pa. DEP) for evaluating waters changed between the publication of the 1996 and 1998 Section 303(d) lists. Prior to 1998, data used to list streams were in a variety of formats, collected under differing protocols. Information also was gathered through the Section 305(b)² reporting process. Pa. DEP is now using the Unassessed Waters Protocol (UWP), a modification of the USEPA Rapid Bioassessment Protocol II (RPB-II), as the primary mechanism to assess Pennsylvania's waters. The UWP provides a more consistent approach to assessing Pennsylvania's streams.

 $^{^{2}}$ Section 305(b) of the Clean Water Act requires a biannual description of the water quality of the waters of the state.

The assessment method requires selecting representative stream segments based on factors such as surrounding land uses, stream characteristics, surface geology, and point source discharge locations. The biologist selects as many sites as necessary to establish an accurate assessment for a stream segment; the length of the stream segment can vary between sites. All the biological surveys included kick-screen sampling of benthic macroinvertebrates, habitat surveys, and measurements of pH, temperature, conductivity, dissolved oxygen, and alkalinity. Benthic macroinvertebrates are identified to the family level in the field.

After the survey is completed, the biologist determines the status of the stream segment. The decision is based on the performance of the segment using a series of biological metrics. If the stream is determined to be impaired, the source and cause of the impairment is documented. An impaired stream must be listed on the state's Section 303(d) list with the documented source and cause. A TMDL must be developed for the stream segment. A TMDL is for only one pollutant. If a stream segment is impaired by two pollutants, two TMDLs must be developed for that stream segment. In order for the process to be more effective, adjoining stream segments with the same source and cause listing are addressed collectively, and on a watershed basis.

Basic Steps for Determining a TMDL

Although all watersheds must be handled on a case-by-case basis when developing TMDLs, there are basic processes or steps that apply to all cases. They include:

- 1. Collection and summarization of pre-existing data (watershed characterization, inventory contaminant sources, determination of pollutant loads, etc.);
- 2. Calculate TMDL for the waterbody using USEPA approved methods and computer models;
- 3. Allocate pollutant loads to various sources;
- 4. Determine critical and seasonal conditions;
- 5. Submit draft report for public review and comments; and
- 6. USEPA approval of the TMDL.

Watershed History

Newmyer Run is a small watershed that is part of the Monongahela River Watershed located in the northeastern part of Fayette County on the eastern edge of Chestnut Ridge. Chestnut Ridge rises to heights of more than 2,900 feet. Newmyer Run is approximately 1,800 feet in elevation. The area is wooded and rocky, and sparsely populated. The area originally had a dense cover of trees, but clearing for farms and cutting for commercial purposes eliminated the virgin stands of timber. The Newmyer Run Watershed has been extensively mined and remined on the Upper and Middle Kittanning, and Upper and Lower Freeport coal seams. The Clarion coal crops at the headwaters of the Newmyer Run but has not been surface mined. No mechanized deep mining has occurred in the past in the area of Newmyer Run. The area is noted for its radical changes in topography, from nearly level in places, to very steep, underlain by bedrock, that is dominantly acidic sandstone, on the uplands. Strip mine spoils located within the watershed are commonly steep and occur on hillsides. The material consists of disturbed soils and overburden that is high in compounds of sulfur and iron. Most of the abandoned strip mines and spoil have been remined and reclaimed.

Amerikohl Mining, Inc. was recently issued a re-mining permit (SMP 26010101) for the "Knopsnider Strip". This permit has not been activated. Because no mining operations have started for the permit, there have been no discharges to Newmyer Run, therefore; no flow data is available. A waste load allocation is calculated using the methodology provided in the following section.

Method to Quantify Treatment Pond Pollutant Load

The following is an explanation of the quantification of the potential pollution load reporting to the stream from permitted pit water treatment ponds that discharge water at established effluent limits.

Surface coal mines remove soil and overburden materials to expose the underground coal seams for removal. After removal of the coal the overburden is replaced as mine spoil and the soil is replaced for revegetation. In a typical surface mining operation the overburden materials is removed and placed in the previous cut where the coal has been removed. In this fashion, an active mining operation has a pit that progresses through the mining site during the life of the mine. The pit may have water reporting to it, as it is a low spot in the local area. Pit water can be the result of limited shallow groundwater seepage, direct precipitation into the pit, and surface runoff from partially regarded areas that have been backfilled but not yet revegetated. Pit water is pumped to nearby treatment ponds where it is treated to the required treatment pond effluent limits. The standard effluent limits are as follows, although stricter effluent limits may be applied to a mining permit's effluent limits to insure that the discharge of treated water does not cause in-stream limits to be exceeded.

Standard Treatment Pond Effluent Limits: Alkalinity > Acidity $6.0 \ll pH \ll 9.0$ Fe $\ll 3.0 \text{ mg/l}$ Mn $\ll 2.0 \text{ mg/l}$ Al $\ll 2.0 \text{ mg/l}$

Discharge from treatment ponds on a mine site is intermittent and often varies as a result of precipitation events. Measured flow rates are almost never available. If accurate flow data are available, it is used along with the Best Available Technology (BAT) limits to quantify the WLA for one or more of the following: aluminum, iron, and manganese. The following formula is used:

The following is an approach that can be used to determine a waste load allocation for an active mining operation when treatment pond flow rates are not available. The methodology involves quantifying the hydrology of the portion of a surface mine site that contributes flow to the pit and then calculating waste load allocation using NPDES treatment pond effluent limits.

The total water volume reporting to ponds for treatment can come from two primary sources: direct precipitation to the pit and runoff from the unregraded area following the pit's progression through the site. Groundwater seepage reporting to the pit is considered negligible compared to the flow rates resulting from precipitation.

In an active mining scenario, a mine operator pumps pit water to the ponds for chemical treatment. Pit water is often acidic with dissolved metals in nature. At the treatment ponds, alkaline chemicals are added to increase the pH and encourage dissolved metals to precipitate and settle. Pennsylvania averages 41.4 inches of precipitation per year (Mid-Atlantic River Forecast Center, National Weather Service, State College, PA, 1961-1990, http://www.dep.state.pa.us/dep/subject/hotopics/drought/PrecipNorm.htm). A maximum pit dimension without special permit approval is 1500 feet long by 300 feet wide. Assuming that 5 percent of the precipitation evaporates and the remaining 95 percent flows to the low spot in the active pit to be pumped to the treatment ponds, results in the following equation and average flow rates for the pit area.

41.4 in. precip./yr x 0.95 x 1 ft./12/in. x 1500'x300'/pit x 7.48 gal/ft³ x 1yr/365days x 1day/24hr. x 1hr./60 min. =

= 21.0 gal/min average discharge from direct precipitation into the open mining pit area.

Pit water can also result from runoff from the unregraded and revegetated area following the pit. In the case of roughly backfilled and highly porous spoil, there is very little surface runoff. It is estimated that 80 percent of precipitation on the roughly regraded mine spoil infiltrates, 5 percent evaporates, and 15 percent may run off to the pit for pumping and potential treatment (Jay Hawkins, Office of Surface Mining, Department of the Interior, Personal Communications 2003). Regrading and revegetation of the mine spoil is conducted as the mining progresses. DEP encourages concurrent backfilling and revegetation through its compliance efforts and it is in the interest of the mining operator to minimize the company's reclamation bond liability by keeping the site reclaimed and revegetated. Experience has shown that reclamation and revegetation is accomplished two to three pit widths behind the active mining pit area. DEP uses three pit widths as an area representing potential flow to the pit when reviewing the NPDES permit application and calculating effluent limits based on best available treatment technology and insuring that in-stream limits are met. The same approach is used in the following equation, which represents the average flow reporting to the pit from the unregraded and unrevegetated spoil area.

41.4 in. precip./yr x 3 pit areas x 1 ft./12/in. x 1500'x300'/pit x 7.48 gal/ft³ x 1yr/365days x 1day/24hr. x 1hr./60 min. x 15 in. runoff/100 in. precipitation =

= 9.9 gal./min. average discharge from spoil runoff into the pit area.

The total average flow to the pit is represented by the sum of the direct pit precipitation and the water flowing to the pit from the spoil area as follows:

Total Average Flow = Direct Pit Precipitation + Spoil Runoff

Total Average Flow = 21.0 gal./min + 9.9 gal./min. = 30.9 gal./min.

The resulting average waste load from a permitted treatment pond area is as follows.

Allowable Iron Waste Load Allocation: 30.9 gal./min. x 3 mg/l x 0.01202 = 1.1 lbs./day

Allowable Manganese Waste Load Allocation: 30.9 gal./min. x 2 mg/l x 0.01202 = 0.7 lbs./day

Allowable Aluminum Waste Load Allocation: 30.9 gal./min. x 2 mg/l x 0.01202 = 0.7 lbs./day

(Note: 0.01202 is a conversion factor to convert from a flow rate in gal/min. and a concentration in mg/l to a load in units of lbs./day.)

There is little or no documentation available to quantify the actual amount of water that is typically pumped from active pits to treatment ponds. Experience and observations suggest that the above approach is very conservative and overestimates the quantity of water, creating a large margin of safety in the methodology. County specific precipitation rates can be used in place of the long-term state average rate, although the margin of safety is greater than differences from individual counties. It is common for many mining sites to have very "dry" pits that rarely accumulate water that would require pumping and treatment.

Also, it is the goal of DEP's permit review process to not issue mining permits that would cause negative impacts to the environment. As a step to insure that a mine site does not produce acid mine drainage, it is common to require the addition of alkaline materials (waste lime, baghouse lime, limestone, etc.) to the backfill spoil materials to neutralize any acid-forming materials that may be present. This practice of 'alkaline addition' or the incorporation of naturally occurring alkaline spoil materials (limestone, alkaline shale or other rocks) may produce alkaline pit water with very low metals concentrations that does not require treatment. A comprehensive study in 1999 evaluated mining permits issued since 1987 and found that only 2.2 percent resulted in a post-mining pollution discharge (Evaluation of Mining Permits Resulting in Acid Mine Drainage 1987-1996: A Post Mortem Study, March 1999). As a result of efforts to insure that acid mine drainage is prevented, most mining operations have alkaline pit water that often meets effluent limits and requires little or no treatment.

While most mining operations are permitted and allowed to have a standard, 1500' x 300' pit, most are well below that size and have a corresponding decreased flow and load. Where pit dimensions are greater than the standard size or multiple pits are present, the calculations to define the potential pollution load can be adjusted accordingly. Hence, the above calculated

Waste Load Allocation is very generous and likely high compared to actual conditions that are generally encountered. A large margin of safety is included in the WLA calculations.

This is an explanation of the quantification of the potential pollution load reporting to the stream from permitted pit water treatment ponds that discharge water at established effluent limits. This allows for including active mining activities and their associated Waste Load in the TMDL calculations to more accurately represent the watershed pollution sources and the reductions necessary to achieve in-stream limits. When a mining operation is concluded its WLA is available for a different operation. Where there are indications that future mining in a watershed are greater than the current level of mining activity, an additional WLA amount may be included to allow for future mining.

TMDL Endpoints

One of the major components of a TMDL is the establishment of an instream numeric endpoint, which is used to evaluate the attainment of applicable water quality. An instream numeric endpoint, therefore, represents the water quality goal that is to be achieved by implementing the load reductions specified in the TMDL. The endpoint allows for comparison between observed instream conditions and conditions that are expected to restore designated uses. The endpoint is based on either the narrative or numeric criteria available in water quality standards.

Because of the nature of the pollution sources in the watershed, the TMDLs component makeup will be load allocations that are specified above a point in the stream segment. All allocations will be specified as long-term average daily concentrations. These long-term average daily concentrations are expected to meet water quality criteria 99 percent of the time. Pennsylvania Title 25 Chapter 96.3(c) specifies that the water quality standards must be met 99% of the time. The iron TMDLs are expressed at total recoverable as the iron data used for this analysis was reported as total recoverable. The aluminum criterion is located in Pennsylvania Title 25 Chapter 16.102. Sulfates have been added to Pennsylvania Title 25 Chapter 96.3(d). The following table shows the water quality criteria for the selected parameters.

Table	2. Applicable Water C	Zuanty Criteria
	Criterion Value	Total
Parameter	(mg/l)	Recoverable/Dissolved
Aluminum (Al)	0.75	Total Recoverable
Iron (Fe)	1.50	30-day average; Total
		Recoverable
Manganese (Mn)	1.00	Total Recoverable
pH *	6.0-9.0	N/A
Sulfates	250	Total Recoverable

Table 2. Applicable Water Quality Criteria

*The pH values shown will be used when applicable. In the case of freestone streams with little or no buffering capacity, the TMDL endpoint for pH will be the natural background water quality. These values are typically as low as 5.4 (Pennsylvania Fish and Boat Commission).

TMDL Elements (WLA, LA, MOS)

A TMDL equation consists of a wasteload allocation, load allocation and a margin of safety. The wasteload allocation is the portion of the load assigned to point sources. The load allocation is the portion of the load assigned to nonpoint sources. The margin of safety is applied to account for uncertainties in the computational process. The margin of safety may be expressed implicitly (documenting conservative processes in the computations) or explicitly (setting aside a portion of the allowable load).

Allocation Summary

These TMDLs will focus remediation efforts on the identified numerical reduction targets for each watershed. As changes occur in the watershed, the TMDLs may be re-evaluated to reflect current conditions. Table 3 presents the estimated reductions identified for all points in the watershed. Attachment D gives detailed TMDLs by segment analysis for each allocation point.

		Mea Samn	sured	Allow	ahla	Reduction
Point	Parameter	Conc	Load		Load	Tacitatica
	i ulullotoi	(ma/l)	(lb/dav)	(ma/l)	(lb/dav)	Percent
125		Ne	wmver Run mos	st upstream sample	point	
	AI	3.73	24.4	0.52	3.4	86
	Fe	1.04	6.8	0.87	5.7	49
	Mn	2.85	18.7	0.88	5.8	76
	Acidity	34.04	223.4	0.00	0.0	100
	Alkalinity	0.00	0.0			
124		Newmye	er Run upstream	of Unnamed Tribu	tary 38309	
	AI	1.78	17.2	0.32	3.1	0
	Fe	0.29	2.8	0.29	2.8	0
	Mn	1.90	18.4	0.82	7.9	0
	Acidity	12.78	123.7	0.51	4.9	0
	Alkalinity	1.23	11.9			
123			Mouth of Unna	med Tributary 3830)9	
	AI	2.40	9.4	0.22	0.8	91
	Fe	1.20	4.7	0.45	1.8	62
	Mn	2.60	10.2	0.29	1.1	89
	Acidity	4.89	19.2	0.88	3.5	82
	Alkalinity	9.63	37.7			
122			Unnamed '	Tributary 38308		
	AI	0.04	0.03	0.04	0.03	0
	Fe	0.23	0.2	0.23	0.2	0
	Mn	0.06	0.04	0.06	0.04	0
	Acidity	7.50	5.6	7.50	5.6	0
	Alkalinity	36.81	27.6			
121			Mouth of	Newmyer Run		
	AI	2.93	53.6	0.47	8.6	64
	Fe	0.64	11.7	0.64	11.7	0
	Mn	2.70	49.5	0.78	14.4	45
	Acidity	10.28	188.5	0.72	13.2	0
	Alkalinity	2.45	44.9			

Table 3. Summary Table–Newmyer Run Watershed

All waste load allocations were calculated using the methodology explained previously in the Method to Quantify Treatment Pond Pollutant Load section of the report.

A waste load allocation for the recently issued Amerikohl Mining, Inc. SMP 26010101 Knopsnider Strip is incorporated into the calculations at point 125. This is the first downstream monitoring point that receives all the potential flow of treated water from the site. No required reductions of these permits are necessary at this time because there are upstream non-point sources that when reduced will meet the TMDL. Because there is no measured flow data available, the flow is calculated based on precipitation and runoff using the 1500' x 300' standard pit dimensions. Waste load allocations are assigned to outfalls 002 and 004 for iron, aluminum, and manganese. Although aluminum is not included in the permit, a waste load allocation is assigned. All necessary reductions are assigned to non-point sources.

Amerikahl Mining Inc	Parameter	Allowable	Calculated	WI A
SMP 26010101	1 al aniciel	Average	Average Flow	(lbs/day)
Knopsnider Strip		Monthly	(MGD)	
NPDES PA0202894		Conc.		
		(mg/L)		
Outfall 002	Fe	3.0	0.0446	1.1
	Mn	2.0	0.0446	0.7
	Al	2.0	0.0446	0.7
Outfall 004	Fe	3.0	0.0446	1.1
	Mn	2.0	0.0446	0.7
	Al	2.0	0.0446	0.7

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Recommendations

Two primary programs that provide reasonable assurance for maintenance and improvement of water quality in the watershed are in effect. The PADEP's efforts to reclaim abandoned mine lands, coupled with its duties and responsibilities for issuing NPDES permits, will be the focal points in water quality improvement.

Additional opportunities for water quality improvement are both ongoing and anticipated. Historically, a great deal of research into mine drainage has been conducted by PADEP's Bureau of Abandoned Mine Reclamation, which administers and oversees the Abandoned Mine Reclamation Program in Pennsylvania, the United States Office of Surface Mining, the National Mine Land Reclamation Center, the National Environmental Training Laboratory, and many other agencies and individuals. Funding from EPA's 319 Grant program, and Pennsylvania's Growing Greener program have been used extensively to remedy mine drainage impacts. These many activities are expected to continue and result in water quality improvement.

Remining is when an operator will remine an existing abandoned site and recover coal which could not be recovered with earlier technology. In the process, the operator removes coal and other pyretic materials, which in turn reduces acid formation and accompanying metals loading to surface and ground waters. This type of activity is encouraged because it not only improves water quality and enhances land use, but it also provides revenue for the operator. Remining for this area is complete.

The PA DEP Bureau of Mining and Reclamation administers an environmental regulatory program for all mining activities, mine subsidence regulation, mine subsidence insurance, and coal refuse disposal; conducts a program to ensure safe underground bituminous mining and protect certain structures form subsidence; administers a mining license and permit program; administers a regulatory program for the use, storage, and handling of explosives; provides for training, examination, and certification of applicants for blaster's licenses; and administers a loan program for bonding anthracite underground mines and for mine subsidence. Administers the EPA Watershed Assessment Grant Program, the Small Operator's Assistance Program (SOAP), and the Remining Operators Assistance Program (ROAP).

Reclaim PA is DEP's initiative designed to maximize reclamation of the state's quarter million acres of abandoned mineral extraction lands. Abandoned mineral extraction lands in Pennsylvania constituted a significant public liability – more than 250,000 acres of abandoned surface mines, 2,400 miles of streams polluted with mine drainage, over 7,000 orphaned and abandoned oil and gas wells, widespread subsidence problems, numerous hazardous mine openings, mine fires, abandoned structures and affected water supplies – representing as much as one third of the total problem nationally.

Mine reclamation and well plugging refers to the process of cleaning up environmental pollutants and safety hazards associated with a site and returning the land to a productive condition, similar to DEP's Brownfields program. Since the 1960's, Pennsylvania has been a national leader in establishing laws and regulations to ensure reclamation and plugging occur after active operation is completed.

Pennsylvania is striving for complete reclamation of its abandoned mines and plugging of its orphaned wells. Realizing this task is no small order, DEP has developed concepts to make abandoned mine reclamation easier. These concepts, collectively called Reclaim PA, include legislative, policy land management initiatives designed to enhance mine operator, volunteer land DEP reclamation efforts. Reclaim PA has the following four objectives.

- To encourage private and public participation in abandoned mine reclamation efforts
- To improve reclamation efficiency through better communication between reclamation partners
- To increase reclamation by reducing remining risks
- To maximize reclamation funding by expanding existing sources and exploring new sources.

The Mountain Watershed Association is active in the Newmyer Run Watershed. The Mountain Watershed Association has a PL566 Plan which includes plans for the restoration of the

Newmyer Run Watershed. The plan was developed by the United States Department of Agriculture, Natural Resources Conservation Service. Two restoration projects involving abandoned surface mines are currently underway in the watershed. The Marsolino Coal & Coke, Inc. (MDP 3376SM14) "Leighty Strip" project is located between stream segment 38309 and the main stem of Newmyer Run. Phase I of the project, which will start Summer 2003, will involve some site reclamation to reduce infiltration and the instillation of drains to dewater the spoil. Phase II will be to design and install a passive treatment system to treat several discharges. The Rondell Company (MDP 3373SM7) "Correal Strip" project is located in the headwaters of stream segment 38312. Phase I of the project will involve regrading approximately 5.5 acres adjacent to the discharge area, reclaiming and revegetating approximately 20 acres at the upper portion of the site, and constructing two spoil drains. Phase II will be to design and install a passive treatment. The projects are being developed and designed by the PA DEP, Bureau of Abandoned Mine Reclamation. The projects are being funded by Title IV and bond forfeiture funds. These projects will reduce the acidity and metal loads in the Newmyer Run Watershed.

Public Participation

Public notice of the draft TMDL was published in the *Pennsylvania Bulletin* on December 21, 2002 and *The Herald Standard* on January 22, 2003 to foster public comment on the allowable loads calculated. A public meeting was held on January 29, 2003 at the Saltlick Township Municipal Building at 6:30 pm to discuss the proposed TMDL.

Attachment A

Newmyer Run Watershed Map



Attachment B

AMD Methodology, the pH Method, and Surface Mining Control and Reclamation Act

AMD Methodology

Two approaches are used for the TMDL analysis of AMD-affected stream segments. Both of these approaches use the same statistical method for determining the instream allowable loading rate at the point of interest. The difference between the two is based on whether the pollution sources are defined as discharges that are permitted or have a responsible party, which are considered point sources. Nonpoint sources are then any pollution sources that are not point sources.

For situations where all of the impact is due to nonpoint sources, the equations shown below are applied using data for a point in the stream. The load allocation made at that point will be for all of the watershed area that is above that point. For situations where there are only point-source impacts or a combination of point and nonpoint sources, the evaluation will use the point-source data and perform a mass balance with the receiving water to determine the impact of the point source.

TMDLs and load allocations for each pollutant were determined using Monte Carlo simulation. Allocations were applied uniformly for the watershed area specified for each allocation point. For each source and pollutant, it was assumed that the observed data were log-normally distributed. Each pollutant source was evaluated separately using @Risk³ by performing 5,000 iterations to determine any required percent reduction so that the water quality criteria will be met instream at least 99 percent of the time. For each iteration, the required percent reduction is:

$PR = maximum \{0, (1-Cc/Cd)\}$	where	(1)
---------------------------------	-------	-----

PR = required percent reduction for the current iteration

Cc = criterion in mg/l

Cd = randomly generated pollutant source concentration in mg/l based on the observed data

Cd = RiskLognorm(Mean, Standard Deviation)	where	(1a)
--	-------	------

Mean = average observed concentration Standard Deviation = standard deviation of observed data

The overall percent reduction required is the 99th percentile value of the probability distribution generated by the 5,000 iterations, so that the allowable long-term average (LTA) concentration is:

LTA = Mean * (1 - PR99)

where (2)

³ @Risk – Risk Analysis and Simulation Add-in for Microsoft Excel, Palisade Corporation, Newfield, NY, 1990-1997.

LTA = allowable LTA source concentration in mg/l

Once the required percent reduction for each pollutant source was determined, a second series of Monte Carlo simulations were performed to determine if the cumulative loads from multiple sources allow instream water quality criteria to be met at all points at least 99 percent of the time. The second series of simulations combined the flows and loads from individual sources in a stepwise fashion, so that the level of attainment could be determined immediately downstream of each source. Where available data allowed, pollutant-source flows used were the average flows. Where data were insufficient to determine a source flow frequency distribution, the average flow derived from linear regression was used.

In general, these cumulative impact evaluations indicate that, if the percent reductions determined during the first step of the analysis are achieved, water quality criteria will be achieved at all upstream points, and no further reduction in source loadings is required.

Where a stream segment is listed on the Section 303(d) list for pH impairment, the evaluation is the same as that discussed above; the pH method is fully explained in Attachment B. An example calculation from the Swatara Creek TMDL, including detailed tabular summaries of the Monte Carlo results, is presented for the Lorberry Creek TMDL in Attachment C. Information for the TMDL analysis performed using the methodology described above is contained in the TMDLs by segment section of this report in Attachment D.

Accounting for Upstream Reductions in AMD TMDLs

In AMD TMDLs, sample points are evaluated in headwaters (most upstream) to stream mouth (most downstream) order. As the TMDL evaluation moves downstream the impact of the previous, upstream, evaluations must be considered. The following examples are from the Beaver Run AMD TMDL (2003):



In the first example BR08 is the most upstream sample point and BR02 is the next downstream sample point. The sample data, for both sample points, are evaluated using @Risk (explained above) to calculate the existing loads, allowable loads, and a percentage reduction for aluminum, iron, manganese, and acidity (when flow and parameter data are available).

Any calculated load reductions for the upstream sample point, BR08, must be accounted for in the calculated reductions at sample point BR02. To do this (see table A) the allowable load is subtracted from the existing load, for each parameter, to determine the total load reduction.

In table B the Total Load Reduction BR08 is subtracted from the Existing loads at BR02 to determine the Remaining Load. The Remaining Load at BR02 has the previously calculated Allowable Loads at BR02 subtracted to determine any load reductions at sample point BR02. This results in load reductions for aluminum, iron and manganese at sample point BR02.

At sample point BR05 this same procedure is also used to account for calculated reductions at sample points BR08 and BR02. As can be seen in Tables C and D this procedure results in additional load reductions for iron, manganese and acidity at sample point BR04.

Table A	Alum.	Iron	Mang.	Acidity
BR08	(#/day)	(#/day)	(#/day)	(#/day)
existing load=	3.8	2.9	3.5	0.0
allowable load=	3.8	2.9	3.5	0.0
TOTAL LOAD REDUCTION=	0.0	0.0	0.0	0.0

Table B. Nec	essary Red	ductions at	Beaver Ru	n BR02
	AI (#/day)	Fe (#/day)	Mn (#/day)	Acidity (#/day)
Existing Loads at BR02	13.25	38.44	21.98	6.48
Total Load Reduction BR08	0.00	0.00	0.00	0.00
Remaining Load (Existing Load at BR02 - BR08)	13.25	38.44	21.98	6.48
Allowable Loads at BR02	2.91	9.23	7.03	6.48
Percent Reduction	78.0%	76.0%	68.0%	NA
Additional Removal Required at BR02	10.33	29.21	14.95	0.00

At sample point BR05 (the most downstream) no additional load reductions are required, see Tables E and F.

C-1.1. C					
Table C	Alum.	Iron	Ma	ng.	Acidity
3R08 & BR02	(#/day)	(#/da	ay) (#/o	lay)	(#/day)
Total Load	d				
Reduction=	10.33	29.2	1 14.	95	0.0
Table D. Necess BR04	ary Red	uctions	at Beav	er Ri	un
-	A 1	F -	Ma	A	1.4.
	Ai (#/day)	ге (#/day)	(#/day)	(#/d	ay)
Existing Loads at BR04	12.48	138.80	54.47	38.7	76
Total Load Reduction BR08 & BR02	10.33	29.21	14.95	0.00)
Remaining Load (Existing Load at 3BR04 - TLR Sum	2.15	109.59	39.53	38.7	76
Allowable Loads					
	8.99	19.43	19.06	38.4	46
Percent Reduction	NA	82.3%	51.8%	0.89	%
Removal Required at 3R04	0.00	90.16	20.46	0.29	9
		1			-

Although the evaluation at sample point BR05 results in no additional removal this does not mean there are no AMD problems in the stream segment BR05 to BR04. The existing and allowable loads for BR05 show that iron and manganese exceed criteria and, any abandoned mine discharges in this stream segment will be addressed.

Method for Addressing Section 303(d) Listings for pH

There has been a great deal of research conducted on the relationship between alkalinity, acidity, and pH. Research published by the Pa. Department of Environmental Protection demonstrates that by plotting net alkalinity (alkalinity-acidity) vs. pH for 794 mine sample points, the resulting pH value from a sample possessing a net alkalinity of zero is approximately equal to six (Figure 1). Where net alkalinity is positive (greater than or equal to zero), the pH range is most commonly six to eight, which is within the USEPA's acceptable range of six to nine and meets Pennsylvania water quality criteria in Chapter 93.

The pH, a measurement of hydrogen ion acidity presented as a negative logarithm, is not conducive to standard statistics. Additionally, pH does not measure latent acidity. For this reason, and based on the above information, Pennsylvania is using the following approach to address the stream impairments noted on the Section 303(d) list due to pH. The concentration of acidity in a stream is at least partially chemically dependent upon metals. For this reason, it is extremely difficult to predict the exact pH values, which would result from treatment of abandoned mine drainage. Therefore, net alkalinity will be used to evaluate pH in these TMDL calculations. This methodology assures that the standard for pH will be met because net alkalinity is a measure of the reduction of acidity. When acidity in a stream is neutralized or is restored to natural levels, pH will be acceptable. Therefore, the measured instream alkalinity at the point of evaluation in the stream will serve as the goal for reducing total acidity at that point. The methodology that is applied for alkalinity (and therefore pH) is the same as that used for other parameters such as iron, aluminum, and manganese that have numeric water quality criteria.

Each sample point used in the analysis of pH by this method must have measurements for total alkalinity and total acidity. Net alkalinity is alkalinity minus acidity, both being in units of milligrams per liter (mg/l) CaCO₃. The same statistical procedures that have been described for use in the evaluation of the metals is applied, using the average value for total alkalinity at that point as the target to specify a reduction in the acid concentration. By maintaining a net alkaline stream, the pH value will be in the range between six and eight. This method negates the need to specifically compute the pH value, which for mine waters is not a true reflection of acidity. This method assures that Pennsylvania's standard for pH is met when the acid concentration reduction is met.

There are several documented cases of streams in Pennsylvania having a natural background pH below six. If the natural pH of a stream on the Section 303(d) list can be established from its upper unaffected regions, then the pH standard will be expanded to include this natural range. The acceptable net alkalinity of the stream after treatment/abatement in its polluted segment will be the average net alkalinity established from the stream's upper, pristine reaches added to the acidity of the polluted portion in question. Summarized, if the pH in an unaffected portion of a stream is found to be naturally occurring below six, then the average net alkalinity for that portion (added to the acidity of the polluted portion) of the stream will become the criterion for the polluted portion. This "natural net alkalinity level" will be the criterion to which a 99 percent confidence level will be applied. The pH range will be varied only for streams in which a natural unaffected net alkalinity level can be established. This can only be done for streams that have upper segments that are not impacted by mining activity. All other streams will be required to reduce the acid load so the net alkalinity is greater than zero 99% of time.

Reference: Rose, Arthur W. and Charles A. Cravotta, III 1998. Geochemistry of Coal Mine Drainage. Chapter 1 in Coal Mine Drainage Prediction and Pollution Prevention in Pennsylvania. Pa. Dept. of Environmental Protection, Harrisburg, Pa.



Figure 1. Net Alkalinity vs. pH. Taken from Figure 1.2 Graph C, pages 1-5, of Coal Mine Drainage Prediction and Pollution Prevention in Pennsylvania

Surface Mining Control and Reclamation Act

The Surface Mining Control and Reclamation Act of 1977 (SMCRA, Public Law 95-87) and its subsequent revisions were enacted to established a nationwide program to, among other things, protect the beneficial uses of land or water resources, and public health and safety from the adverse effects of current surface coal mining operations, as well as promote the reclamation of mined areas left without adequate reclamation prior to August 3, 1977. SMCRA requires a permit for the development of new, previously mined, or abandoned sites for the purpose of surface mining. Permittees are required to post a performance bond that will be sufficient to ensure the completion of reclamation requirements by the regulatory authority in the event that the applicant forfeits. Mines that ceased operating by the effective date of SMCRA, (often called "pre-law" mines) are not subject to the requirements of SMCRA.

Title IV of the Act is designed to provide assistance for reclamation and restoration of abandoned mines, while Title V states that any surface coal mining operations shall be required to meet all applicable performance standards. Some general performance standards include:

- Restoring the affected land to a condition capable of supporting the uses which it was capable of supporting prior to any mining,
- Backfilling and compacting (to insure stability or to prevent leaching of toxic materials) in order to restore the approximate original contour of the land with all highwalls being eliminated, and topsoil replaced to allow revegetation, and
- Minimizing the disturbances to the hydrologic balance and to the quality and quantity of water in surface and ground water systems both during and after surface coal mining operations and during reclamation by avoiding acid or other toxic mine drainage.

For purposes of these TMDLs, point sources are identified as NPDES-permitted discharge points, and nonpoint sources include discharges from abandoned mine lands, including but not limited to, tunnel discharges, seeps, and surface runoff. Abandoned and reclaimed mine lands were treated in the allocations as nonpoint sources because there are no NPDES permits associated with these areas. In the absence of an NPDES permit, the discharges associated with these land uses were assigned load allocations.

The decision to assign load allocations to abandoned and reclaimed mine lands does not reflect any determination by EPA as to whether there are, in fact, unpermitted point source discharges within these land uses. In addition, by establishing these TMDLs with mine drainage discharges treated as load allocations, EPA is not determining that these discharges are exempt from NPDES permitting requirements.

Related Definitions

Pre-Act (Pre-Law) - Mines that ceased operating by the effective date of SMCRA and are not subject to the requirements of SMCRA.

Bond – A instrument by which a permittee assures faithful performance of the requirements of the acts, this chapter, Chapters 87-90 and the requirements of the permit and reclamation plan.

Postmining pollution discharge – A discharge of mine drainage emanating from or hydrologically connected to the permit area, which may remain after coal mining activities have been completed, and which does not comply with the applicable effluent requirements described in Chapters 87.102, 88.92, 88.187, 88.292, 89.52 or 90.102. The term includes minimal-impact postmining discharges, as defined in Section of the Surface Mining Conservation and Reclamation Act.

Forfeited Bond – Bond money collected by the regulatory authority to complete the reclamation of a mine site when a permittee defaults on his reclamation requirements.

Attachment C

Example Calculation: Lorberry Creek

Lorberry Creek was evaluated for impairment due to high metals contents in the following manner: the analysis was completed in a stepwise manner, starting at the headwaters of the stream and moving to the mouth. The Rowe Tunnel (Swat-04) was treated as the headwaters of Lorberry Creek for the purpose of this analysis.

- 1. A simulation of the concentration data at point Swat-04 was completed. This estimated the necessary reduction needed for each metal to meet water quality criteria 99 percent of the time as a long-term average daily concentration. Appropriate concentration reductions were made for each metal.
- 2. A simulation of the concentration data at point Swat-11 was completed. It was determined that no reductions in metals concentrations are needed for Stumps Run at this time. Therefore, no TMDL for metals in Stumps Run is required at this time.
- 3. A mass balance of loading from Swat-04 and Swat-11 was completed to determine if there was any need for additional reductions as a result of combining the loads. No additional reductions were necessary.
- 4. The mass balance was expanded to include the Shadle Discharge (L-1). It was estimated that best available technology (BAT) requirements for the Shadle Discharge were adequate for iron and manganese. There is no BAT requirement for aluminum. A wasteload allocation was necessary for aluminum at point L-1.

There are no other known sources below the Shadle Discharge. However, there is additional flow from overland runoff and one unnamed tributary not impacted by mining. It is reasonable to assume that the additional flow provides assimilation capacity below point L-1, and no further analysis is needed downstream.

The calculations are detailed in the following section (Tables 1-8). Table 9 shows the allocations made on Lorberry Creek.

1. A series of four equations was used to determine if a reduction was needed at point Swat-04, and, if so the magnitude of the reduction.

	Table 1. Equations Used for Rowe Tunnel Analysis (SWAT 04)					
	Field Description	Equation	Explanation			
1	Swat-04 Initial Concentration	= Risklognorm (Mean, St Dev)	This simulates the existing concentration			
	Value (Equation 1A)		of the sampled data.			
2	Swat-04 % Reduction (from	= (Input a percentage based on	This is the percent reduction for the			
	the 99 th percentile of percent	reduction target)	discharge.			
	reduction)					
3	Swat-04 Final Concentration	= Sampled Value x (1-percent	This applies the given percent reduction			
	Value	reduction)	to the initial concentration.			
4	Swat-04 Reduction Target	= Maximum (0, 1- Cd/Cc)	This computes the necessary reduction,			
	(PR)		if needed, each time a value is sampled.			
			The final reduction target is the 99 th			
			percentile value of this computed field.			

2. The reduction target (PR) was computed taking the 99th percentile value of 5,000 iterations of the equation in row four of Table 1. The targeted percent reduction is shown, in boldface type, in the following table.

Table 2. Swat-04 Estimated Target Reductions							
Swat-04Swat-04Swat-04NameAluminumIronManga							
Minimum =	0	0.4836	0				
Maximum =	0.8675	0.9334	0.8762				
Mean =	0.2184	0.8101	0.4750				
Std. Deviation =	0.2204	0.0544	0.1719				
Variance =	0.0486	0.0030	0.0296				
Skewness =	0.5845	-0.8768	-0.7027				
Kurtosis =	2.0895	4.3513	3.1715				
Errors Calculated =	0	0	0				
Targeted Reduction % =	72.2	90.5	77.0				
Target #1 (Perc%)=	99	99	99				

3. This PR value was used as the percent reduction in the equation in row three of Table 1. Testing was done to see that the water quality criterion for each metal was achieved at least 99 percent of the time. This verified the estimated percent reduction necessary for each metal. Table 3 shows, in boldface type, the percent of the time criteria for each metal was achieved during 5,000 iterations of the equation in row three of Table 1.

Table 3. Swat-04 Verification of Target Reductions							
Swat-04 Swat-04 Swat-04							
Name	Aluminum	Iron	Manganese				
Minimum =	0.0444	0.2614	0.1394				
Maximum =	1.5282	2.0277	1.8575				
Mean =	0.2729	0.7693	0.4871				
Std Deviation =	0.1358	0.2204	0.1670				
Variance =	0.0185	0.0486	0.0279				
Skewness =	1.6229	0.8742	1.0996				
Kurtosis =	8.0010	4.3255	5.4404				
Errors Calculated =	0	0	0				
Target #1 (value) (WQ Criteria)=	0.75	1.5	1				
Target #1 (Perc%)=	99.15	99.41	99.02				

4. These same four equations were applied to point Swat-11. The result was that no reduction was needed for any of the metals. Tables 4 and 5 show the reduction targets computed for, and the verification of, reduction targets for Swat-11.

Table 4. Swat-11 Estimated Target Reductions						
Swat-11 Swat-11 Swat-11						
Name	Aluminum	Iron	Manganese			
Minimum =	0.0000	0.0000	0.0000			
Maximum =	0.6114	0.6426	0.0000			
Mean =	0.0009	0.0009	0.0000			
Std Deviation =	0.0183	0.0186	0.0000			
Variance =	0.0003	0.0003	0.0000			
Skewness =	24.0191	23.9120	0.0000			
Kurtosis =	643.4102	641.0572	0.0000			
Errors Calculated =	0	0	0			
Targeted Reduction % =	0	0	0			
Target #1 (Perc%) =	99	99	99			

Table 5. Swat-11 Verification of Target Reductions							
Swat-11 Swat-11 Swat-11							
Name	Aluminum	Iron	Manganese				
Minimum =	0.0013	0.0031	0.0246				
Maximum =	1.9302	4.1971	0.3234				
Mean =	0.0842	0.1802	0.0941				
Std Deviation =	0.1104	0.2268	0.0330				
Variance =	0.0122	0.0514	0.0011				
Skewness =	5.0496	4.9424	1.0893				
Kurtosis =	48.9148	48.8124	5.1358				
Errors Calculated =	0	0	0				
WQ Criteria =	0.75	1.5	1				
% of Time Criteria Achieved =	99.63	99.60	100				

5. Table 6 shows variables used to express mass balance computations.

Table 6. Variable Descriptions for Lorberry Creek Calculations				
Description	Variable Shown			
Flow from Swat-04	Q _{swat04}			
Swat-04 Final Concentration	C_{swat04}			
Flow from Swat-11	Q _{swat11}			
Swat-11 Final Concentration	C_{swat11}			
Concentration below Stumps Run	C_{stumps}			
Flow from L-1 (Shadle Discharge)	Q_{L1}			
Final Concentration From L-1	C _{L1}			
Concentration below L-1	C _{allow}			

6. Swat-04 and Swat-11 were mass balanced in the following manner:

The majority of the sampling done at point Swat-11 was done in conjunction with point Swat-04 (20 matching sampling days). This allowed for the establishment of a significant correlation between the two flows (the R-squared value was 0.85). Swat-04 was used as the

base flow, and a regression analysis on point Swat-11 provided an equation for use as the flow from Swat-11.

The flow from Swat-04 (Q_{swat04}) was set into an @RISK function so it could be used to simulate loading into the stream. The cumulative probability function was used for this random flow selection. The flow at Swat-04 is as follows (Equation 1):

$$Q_{swat04} = RiskCumul(min,max,bin range, cumulative percent of occurrence)$$
 (1)

The RiskCumul function takes four arguments: minimum value, maximum value, the bin range from the histogram, and cumulative percent of occurrence.

The flow at Swat-11 was randomized using the equation developed through the regression analysis with point Swat-04 (Equation 2).

$$Q_{swat11} = Q_{swat}04 \times 0.142 + 0.088 \tag{2}$$

The mass balance equation is as follows (Equation 3):

$$C_{stumps} = ((Q_{swat04} * C_{swat04}) + (Q_{swat11} * C_{swat11}))/(Q_{swat04} + Q_{swat11})$$
(3)

This equation was simulated through 5,000 iterations, and the 99th percentile value of the data set was compared to the water quality criteria to determine if standards had been met. The results show there is no further reduction needed for any of the metals at either point. The simulation results are shown in Table 7.

Table 7. Verification of Meeting Water Quality Standards Below Stumps Run					
	Below Stumps	Below Stumps	Below Stumps		
Name	Run Aluminum	Run Iron	Run Manganese		
Minimum =	0.0457	0.2181	0.1362		
Maximum =	1.2918	1.7553	1.2751		
Mean =	0.2505	0.6995	0.4404		
Std Deviation =	0.1206	0.1970	0.1470		
Variance =	0.0145	0.0388	0.0216		
Skewness =	1.6043	0.8681	1.0371		
Kurtosis =	7.7226	4.2879	4.8121		
Errors Calculated =	0	0	0		
WQ Criteria =	0.75	1.5	1		
% of Time Criteria Achieved =	99.52	99.80	99.64		

7. The mass balance was expanded to determine if any reductions would be necessary at point L-1.

The Shadle Discharge originated in 1997, and very few data are available for it. The discharge will have to be treated or eliminated. It is the current site of a USGS test

remediation project. The data that were available for the discharge were collected at a point prior to a settling pond. Currently, no data for effluent from the settling pond are available.

Modeling for iron and manganese started with the BAT-required concentration value. The current effluent variability based on limited sampling was kept at its present level. There was no BAT value for aluminum, so the starting concentration for the modeling was arbitrary. The BAT values for iron and manganese are 6 mg/l and 4 mg/l, respectively. Table 8 shows the BAT-adjusted values used for point L-1.

Table 8. L-1 Adjusted BAT Concentrations						
Parameter Measured Value BAT adjusted Value						
	Average Standard Conc. Deviation		Average	Standard		
			Conc.	Deviation		
Iron 538.00 19.08		6.00	0.21			
Manganese	33.93	2.14	4.00	0.25		

The average flow (0.048 cfs) from the discharge will be used for modeling purposes. There were not any means to establish a correlation with point Swat-04.

The same set of four equations used for point Swat-04 was used for point L-1. The equation used for evaluation of point L-1 is as follows (Equation 4):

$$C_{\text{allow}} = ((Q_{\text{swat04}} * C_{\text{swat04}}) + (Q_{\text{swat11}} * C_{\text{swat11}}) + (Q_{\text{L1}} * C_{\text{L1}})) / (Q_{\text{swat04}} + Q_{\text{swat11}} + Q_{\text{L1}})$$
(4)

This equation was simulated through 5,000 iterations, and the 99th percentile value of the data set was compared to the water quality criteria to determine if standards had been met. It was estimated that an 81 percent reduction in aluminum concentration was needed for point L-1.

Table 9. Verification of Meeting Water Quality Standards Below Point L-1					
	Below L-1	Below L-1	Below L-1		
Name	Aluminum	Iron	Manganese		
Minimum =	0.0815	0.2711	0.1520		
Maximum =	1.3189	2.2305	1.3689		
Mean =	0.3369	0.7715	0.4888		
Std Deviation =	0.1320	0.1978	0.1474		
Variance =	0.0174	0.0391	0.0217		
Skewness =	1.2259	0.8430	0.9635		
Kurtosis =	5.8475	4.6019	4.7039		
Errors Calculated =	0	0	0		
WQ Criteria=	0.75	1.5	1		
Percent of time achieved=	99.02	99.68	99.48		

8. Table 9 shows the simulation results of the equation above.

9. Table 10 presents the estimated reductions needed to meet water quality standards at all points in Lorberry Creek.

Table 10. Lorberry Creek Summary							
		Meas Sample	Measured Sample Data Allowable				
Station	Parameter	Conc. (mg/l)	Load (lbs/day)	LTA Conc. (mg/l)	Load (lbs/day)	%	
Swat 04							
	Al	1.01	21.45	0.27	5.79	73%	
	Fe	8.55	181.45	0.77	16.33	91%	
	Mn	2.12	44.95	0.49	10.34	77%	
Swat 11							
	Al	0.08	0.24	0.08	0.24	0%	
	Fe	0.18	0.51	0.18	0.51	00%	
	Mn	0.09	0.27	0.09	0.27	00%	
L-1							
	Al	34.90	9.03	6.63	1.71	81%	
	Fe	6.00	1.55	6.00	1.55	0%	
	Mn	4.00	1.03	4.00	1.03	0%	

All values shown in this table are long-term average daily values

The TMDL for Lorberry Creek requires that a load allocation be made to the Rowe Tunnel Discharge (Swat-04) for the three metals listed, and that a wasteload allocation is made to the Shadle Discharge (L-1) for aluminum. There is no TMDL for metals required for Stumps Run (Swat-11) at this time.

Margin of Safety

For this study, the margin of safety is applied implicitly. The allowable concentrations and loadings were simulated using Monte Carlo techniques and employing the @Risk software. Other margins of safety used for this TMDL analysis include the following:

- None of the data sets were filtered by taking out extreme measurements. Because the 99 percent level of protection is designed to protect for the extreme event, it was pertinent not to filter the data set.
- Effluent variability plays a major role in determining the average value that will meet water quality criteria over the long term. This analysis maintained that the variability at each point would remain the same. The general assumption can be made that a treated discharge would be less variable than an untreated discharge. This implicitly builds in another margin of safety.

Attachment D

TMDLs By Segment

NEWMYER RUN

The TMDL for Newmyer Run consists of load allocations of five tributaries and three sampling sites along the stream and a waste load allocation to the two permitted discharges from the Amerikohl Mining, Inc SMP 26010101 Knopsnider Strip. Following is an explanation of the TMDL for each allocation point.

Newmyer Run is listed for high metals from AMD as being the cause of the degradation to the stream.

Waste Load Allocation – Amerikohl Mining, Inc. (Knopsnider Site)

The Amerikohl Mining, Inc. SMP 26010101, Knopsnider Strip, has two permitted treatment facility outfalls, 002 and 004. The waste load allocations for each outfall was calculated as described in the *Method to Quantify Treatment Pond Pollutant Loading* section of the report. Waste load allocations for the two outfalls were incorporated into the calculations at sample point 125. This is the first downstream monitoring point that receives all the potential flow of treated water from the two outfalls. The following table shows the waste load allocations for each discharge.

Table D1. Waste Load Allocations Knopsnider Strip						
Parameter	Monthly Avg. Allowable Conc.	Average Flow (MGD)	Allowable Load			
	(mg/L)		(lbs/day)			
002						
Fe	3.0	0.0446	1.1			
Mn	2.0	0.0446	0.7			
Al	2.0	0.0446	0.7			
004						
Fe	3.0	0.0446	1.1			
Mn	2.0	0.0446	0.7			
Al	2.0	0.0446	0.7			

TMDL calculations- Sampling Point 125, mainstem Newmyer Run

The TMDL for sample point 125 consists of a waste load allocation to the discharges from the Knopsnider Strip and a load allocation to all of the area above the point shown in Attachment A. The load allocation for this tributary was computed using water-quality sample data collected at point 125. The average flow, measured at the sampling point 125 (0.79 MGD), is used for these computations.

There currently is no entry for this segment on the Pa 303(d) list for impairment due to pH. Sample data at point 125 shows pH ranging between 3.96 and 4.30, and pH will be addressed in this TMDL. The objective is to reduce acid loading to the stream, which will in turn raise the pH to the desired range and keep a net alkalinity above zero, 99% of the time. The result of this

analysis is an acid loading reduction that equates to meeting standards for pH (see TMDL Endpoint section in the report, Table 3). The method and rationale for addressing pH is contained in Attachment B.

An allowable long-term average in-stream concentration was determined at point 125 for aluminum, iron, manganese, and acidity. The analysis is designed to produce an average value that, when met, will be protective of the water-quality criterion for that parameter 99% of the time. An analysis was performed using Monte Carlo simulation to determine the necessary longterm average concentration needed to attain water-quality criteria 99% of the time. The simulation was run assuming the data set was lognormally distributed. Using the mean and standard deviation of the data set, 5000 iterations of sampling were completed, and compared against the water-quality criterion for that parameter. For each sampling event a percent reduction was calculated, if necessary, to meet water-quality criteria. A second simulation that multiplied the percent reduction times the sampled value was run to insure that criteria were met 99% of the time. The mean value from this data set represents the long-term average concentration that needs to be met to achieve water-quality standards. The following table shows the load allocations for this stream segment.

Table D2. Load Allocations at Point 125							
	Measure	d Sample	Allow	able	Reduction		
	Da	ata			Identified		
Parameter	Conc.	Load	LTA conc.	Load	%		
	(mg/l)	(lbs/day)	(mg/l)	(lbs/day)			
Al	3.73	24.4	0.52	3.4	86		
Fe	1.04	6.8	0.87	5.7	49		
Mn	2.85	18.7	0.88	5.8	76		
Acidity	34.04	223.4	0.00	0.0	100		
Alkalinity	0.00	0.0					

TMDL Calculation -Sampling Point 124, mainstem Newmyer Run upstream of Trib. 38309

The TMDL for sampling point 124 consists of a load allocation of the area between sample points 124 and 125. The load allocation for this segment was computed using water-quality sample data collected at point 124. The average flow, measured at the sampling point 124 (1.16 MGD), is used for these computations.

There currently is no entry for this segment on the Section Pa 303(d) list for impairment due to pH. Sample data at point 124 shows pH ranging between 4.67 and 5.28; pH will be addressed as part of this TMDL because of the mining impacts. The objective is to reduce acid loading to the stream, which will in turn raise the pH and keep a net alkalinity above zero, 99% of the time. The result of this analysis is an acid loading reduction that equates to meeting standards for pH (see TMDL Endpoint section in the report, Table 3). The method and rationale for addressing pH is contained in Attachment B.

The existing and allowable loading for point 124 for all parameters was computed using waterquality sample data collected at the point. This was based on the sample data for the point and did not account for any load reductions already specified from upstream sources. The load reduction from point 125 was subtracted from the existing load at point 124 and was compared to the allowable load at 124 for each parameter to determine if any further reductions were needed at this point.

An allowable long-term average in-stream concentration was determined at point 124 for aluminum, iron, manganese, and acidity. The analysis is designed to produce an average value that, when met, will be protective of the water-quality criterion for that parameter 99% of the time. An analysis was performed using Monte Carlo simulation to determine the necessary longterm average concentration needed to attain water-quality criteria 99% of the time. The simulation was run assuming the data set was lognormally distributed. Using the mean and standard deviation of the data set, 5000 iterations of sampling were completed, and compared against the water-quality criterion for that parameter. For each sampling event a percent reduction was calculated, if necessary, to meet water-quality criteria. A second simulation that multiplied the percent reduction times the sampled value was run to insure that criteria were met 99% of the time. The mean value from this data set represents the long-term average concentration that needs to be met to achieve water-quality standards. The following table shows the load allocations for this stream segment.

Table	D3. Load A	llocations	at Point 12	24
	Measured	l Sample		
	Da	ita	Allow	vable
	Conc.	Load	LTAConc.	Load
Parameter	(mg/l)	(lbs/day)	(mg/l)	(lbs/day)
Al	1.78	17.2	0.32	3.1
Fe	0.29	2.8	0.29	2.8
Mn	1.90	18.4	0.82	7.9
Acidity	12.78	123.7	0.51	4.9
Alkalinity	1.23	11.9		

The loading reductions for point 125, shows the total load that was removed from upstream sources. This value, for each parameter, was then subtracted from the existing load at point 124. This value was then compared to the allowable load at point 124. Reductions at point 124 are necessary for any parameter that exceeded the allowable load at this point. Table D4 shows a summary of all loads that affect point 124. Table D5 illustrates the necessary reductions at point 124. The results of this analysis show that no additional reductions are necessary at this point.

Table D4. Summary of All Loads that Affect Point 124										
	Al (lbs/day)	Fe (lbs/day)	Mn (lbs/day)	Acidity (lbs/day)						
Sample Point 125										
load reduction=	21.0	1.1	12.9	223.4						

Table D5. Necessary Reduction	ns at Samp	ole Point 1	.24	
	Al (lbs/day)	Fe (lbs/day)	Mn (lbs/day)	Acidity (lbs/day)
Existing Loads at 124	17.2	2.8	18.4	123.7
Total Load Reduction (125)	21.0	3.3	14.3	223.4
Remaining Load (Existing Loads at 124-TLR Sum)	0.0	0.0	4.1	0.0
Allowable Loads at 124	3.1	2.8	7.9	4.9
Percent Reduction	0.0	0.0	0.0	0.0
Additional Removal Required at 124	0.0	0.0	0.0	0.0

The average flow, measured at sample point 124, is used for these computations. The percent reduction was calculated using below equation.

$$\left[1 - \left(\frac{\text{Allowable Loads at 124}}{\text{Remaining Load (Existing Loads at 124 - TLR Sum}}\right)\right] \times 100\%$$

No additional reductions are necessary at this point.

TMDL Calculation – Tributary 38309, Sampling Point 123

The TMDL for sample point 123 consists of a load allocation to all of the area above the point shown in Attachment A. The load allocation for this tributary was computed using water-quality sample data collected at point 123. The average flow, measured at the sampling point 123 (0.47 MGD), is used for these computations.

There currently is not an entry for this segment on the Pa Section 303(d) list for impairment due to pH. Sample data at point 123 shows pH ranging between 4.77 and 6.74; ph will be addressed as part of the TMDL because of the mining impacts. The method and rationale for addressing pH is contained in Attachment B.

An allowable long-term average in-stream concentration was determined at point 123 for aluminum, iron, manganese, and acidity. The analysis is designed to produce an average value that, when met, will be protective of the water-quality criterion for that parameter 99% of the time. An analysis was performed using Monte Carlo simulation to determine the necessary longterm average concentration needed to attain water-quality criteria 99% of the time. The simulation was run assuming the data set was lognormally distributed. Using the mean and standard deviation of the data set, 5000 iterations of sampling were completed, and compared against the water-quality criterion for that parameter. For each sampling event a percent reduction was calculated, if necessary, to meet water-quality criteria. A second simulation that multiplied the percent reduction times the sampled value was run to insure that criteria were met 99% of the time. The mean value from this data set represents the long-term average concentration that needs to be met to achieve water-quality standards. The following table shows the load allocations for this stream segment.

	Table D6. Load Allocations at Point 123												
	Measure	d Sample	Allow	vable	Reduction								
	Da	ata			Identified								
Parameter	Conc.	Load	LTA	Load	%								
	(mg/l)	(lbs/day)	Conc.	(lbs/day)									
			(mg/l)										
Al	2.40	9.4	0.22	0.8	91								
Fe	1.20	4.7	0.45	1.8	62								
Mn	2.60	10.2	0.29	1.1	89								
Acidity	4.89 19.2		0.88	3.5	82								
Alkalinity	9.63	37.7											

TMDL Calculation – Tributary 38308, Sampling Point 122

The TMDL for sample point 122 consists of a load allocation to all of the area above the point shown in Attachment A. The load allocation for this tributary was computed using water-quality sample data collected at point 122. The average flow, measured at the sampling point 122 (0.090 MGD), is used for these computations.

There currently is no entry for this segment on the Pa Section 303(d) list for impairment due to pH. Sample data at point 122 shows pH ranging between 7.12 and 7.65; pH will not be addressed in this TMDL. The method and rationale for addressing pH is contained in Attachment B.

An allowable long-term average in-stream concentration was determined at point 122 for aluminum, iron, and manganese. The analysis is designed to produce an average value that, when met, will be protective of the water-quality criterion for that parameter 99% of the time. An analysis was performed using Monte Carlo simulation to determine the necessary long-term average concentration needed to attain water-quality criteria 99% of the time. The simulation

was run assuming the data set was lognormally distributed. Using the mean and standard deviation of the data set, 5000 iterations of sampling were completed, and compared against the water-quality criterion for that parameter. For each sampling event a percent reduction was calculated, if necessary, to meet water-quality criteria. A second simulation that multiplied the percent reduction times the sampled value was run to insure that criteria were met 99% of the time. The mean value from this data set represents the long-term average concentration that needs to be met to achieve water-quality standards. The following table shows the load allocations for this stream segment.

Table D7. Load Allocations at Point 122												
	Measured	d Sample	Allow	able	Reduction							
	Da	ata		Identified								
Parameter	Conc.	Load	LTA conc.	Load	%							
	(mg/l) (lbs/day)		(mg/l)	(lbs/day)								
Al	0.04	0.0	0.04	0.0	0							
Fe	0.23	0.2	0.23	0.2	0							
Mn	0.06	0.04	0.06	0.04	0							
Acidity	7.50	5.6	7.50	5.6	0							
Alkalinity	36.81	27.6										

TMDL Calculation - Sampling Point 121, near mouth of Newmyer Run

The TMDL for sampling point 121 along Newmyer Run consists of a load allocation of the area between sample points 121 and 122/123/124. The load allocation for this segment was computed using water-quality sample data collected at point 121. The average flow 2.20 MGD, measured at the sampling point, is used for these computations.

There currently is no entry for this segment on the Pa Section 303(d) list for impairment due to pH. Sample data at point 121 shows pH ranging between 4.72 and 5.96; pH will be addressed as part of this TMDL because of the mining impacts. The objective is to reduce acid loading to the stream, which will in turn raise the pH and keep a net alkalinity above zero, 99% of the time. The result of this analysis is an acid loading reduction that equates to meeting standards for pH (see TMDL Endpoints section in the report, Table 3). The method and rationale for addressing pH is contained in Attachment B.

The existing and allowable loading for point 121 for all parameters was computed using waterquality sample data collected at the point. This was based on the sample data for the point and did not account for any load reductions already specified from upstream sources. The load reduction from points 122, 123, 124, and 125 were subtracted from the existing load at point 121 and then compared to the allowable load at 121 for each parameter to determine if any further reductions were needed at this point. An allowable long-term average in-stream concentration was determined at point 121 for aluminum, iron, manganese, and acidity. The analysis is designed to produce an average value that, when met, will be protective of the water-quality criterion for that parameter 99% of the time. An analysis was performed using Monte Carlo simulation to determine the necessary longterm average concentration needed to attain water-quality criteria 99% of the time. The simulation was run assuming the data set was lognormally distributed. Using the mean and standard deviation of the data set, 5000 iterations of sampling were completed, and compared against the water-quality criterion for that parameter. For each sampling event a percent reduction was calculated, if necessary, to meet water-quality criteria. A second simulation that multiplied the percent reduction times the sampled value was run to insure that criteria were met 99% of the time. The mean value from this data set represents the long-term average concentration that needs to be met to achieve water-quality standards. The following table shows the load allocations for this stream segment.

Table D8. Load Allocations at Point 121										
	Measured	1 Sample								
	Da	ita	Allov	wable						
	Conc.	Load	LTAConc.	Load						
Parameter	(mg/l)	(lbs/day)	(mg/l)	(lbs/day)						
Al	2.93	53.6	0.47	8.6						
Fe	0.64	11.7	0.64	11.7						
Mn	2.70	49.5	0.78	14.4						
Acidity	10.28	188.5	0.72	13.2						
Alkalinity	2.45	44.9								

The loading reductions for points 122, 123, 124, and 125 were summed to show the total load that was removed from upstream sources. This value, for each parameter, was then subtracted from the existing load at point 121. This value was then compared to the allowable load at point 121. Reductions at point 121 are necessary for any parameter that exceeded the allowable load at this point. Table D9 shows a summary of all loads that affect point 121. Table D10 illustrates the necessary reductions at point 121. The results of this analysis show that reductions for aluminum and manganese are necessary at this point.

Table D9. Sur	nmary of All	Loads that	t Affect Poin	nt 121
	Al (lbs/day)	Fe (lbs/day)	Mn (lbs/day)	Acidity (lbs/day)
Sample Point 125				
load reduction=	21.0	3.3	14.3	223.4
Sample Point 124				
load reduction=	0.0	0.0	0.0	0.0
Sample Point 123				
load reduction=	8.6	2.9	9.1	15.7
Sample Point 122				
load reduction=	0.0	0.0	0.0	0.0

Table D10. Necessary Reductio	ns at Sam	ple Point	121	
	Al (lbs/day)	Fe (lbs/day)	Mn (lbs/day)	Acidity (lbs/day)
Existing Loads at 121	53.6	11.7	49.5	188.5
Total Load Reduction (Sum of 122, 123, 124, 125)	29.6	6.2	23.4	239.2
Remaining Load (Existing Loads at 121-TLR Sum)	24.0	5.5	26.1	0.0
Allowable Loads at 121	8.6	11.7	14.4	13.2
Percent Reduction	64.2	0.0	45.0	0.0
Additional Removal Required at 121	15.4	0.0	13.1	0.0

The average flow, measured at sample point 121, is used for these computations. The TMDL for 121 consists of load allocations for aluminum and manganese to all of the area upstream of 121 shown in Attachment A. The percent reduction was calculated using below equation.

$$\left[1 - \left(\frac{\text{Allowable Loads at 121}}{\text{Remaining Load (Existing Loads at 121 - TLR Sum}}\right)\right] \times 100\%$$

No additional loading reductions were necessary for iron and acidity.

Margin of Safety

PADEP used an implicit MOS in these TMDLs derived from the Monte Carlo statistical analysis. The Water Quality standard states that water quality criteria must be met at least 99% of the time. All of the @Risk analyses results surpass the minimum 99% level of protection. Another margin of safety used for this TMDL analysis results from:

- Effluent variability plays a major role in determining the average value that will meet waterquality criteria over the long-term. The value that provides this variability in our analysis is the standard deviation of the dataset. The simulation results are based on this variability and the existing stream conditions (an uncontrolled system). The general assumption can be made that a controlled system (one that is controlling and stabilizing the pollution load) would be less variable than an uncontrolled system. This implicitly builds in a margin of safety.
- A MOS is also the fact that the calculations were performed with a daily Iron average instead of the 30-day average.

Seasonal Variation

Seasonal variation is implicitly accounted for in these TMDLs because the data used represents all seasons.

Critical Conditions

The reductions specified in this TMDL apply at all flow conditions. A critical flow condition could not be identified from the data used for this analysis.

Attachment E

Excerpts Justifying Changes Between the 1996, 1998, and 2002 Section 303(d) Lists

The following are excerpts from the Pennsylvania DEP Section 303(d) narratives that justify changes in listings between the 1996, 1998, and 2002 lists. The Section 303(d) listing process has undergone an evolution in Pennsylvania since the development of the 1996 list.

In the 1996 Section 303(d) list narrative, strategies were outlined for changes to the listing process. Suggestions included, but were not limited to, a migration to a Global Information System (GIS), improved monitoring and assessment, and greater public input.

The migration to a GIS was implemented prior to the development of the 1998 Section 303(d) list. As a result of additional sampling and the migration to the GIS some of the information appearing on the 1996 list differed from the 1998 list. Most common changes included:

- 1. mileage differences due to recalculation of segment length by the GIS;
- 2. slight changes in source(s)/cause(s) due to new EPA codes;
- 3. changes to source(s)/cause(s), and/or miles due to revised assessments;
- 4. corrections of misnamed streams or streams placed in inappropriate SWP subbasins; and
- 5. unnamed tributaries no longer identified as such and placed under the named watershed listing.

Prior to 1998, segment lengths were computed using a map wheel and calculator. The segment lengths listed on the 1998 Section 303(d) list were calculated automatically by the GIS (ArcInfo) using a constant projection and map units (meters) for each watershed. Segment lengths originally calculated by using a map wheel and those calculated by the GIS did not always match closely. This was the case even when physical identifiers (e.g., tributary confluence and road crossings) matching the original segment descriptions were used to define segments on digital quad maps. This occurred to some extent with all segments, but was most noticeable in segments with the greatest potential for human errors using a map wheel for calculating the original segment lengths (e.g., long stream segments or entire basins).

Attachment F Water Quality Data Used In TMDL Calculations

Bottle ID	Site	date-time-samplerID	Flow (gpm)	рН	Acidity (mg/L)	Alk (mg/L)	TSS (mg/L)	Al (ppm)	Fe (ppm)	Mn (ppm)	SO4 (ppm)
73C	121	000626-1650-xjp	1526	5.96	4	4	14	2.7	0.71	3.1	219
71 E	121	000930-1920-cam,jm	628	5.81	5	3	13	2.30	0.57	2.70	180
18G	121	010118-1155-ddk,mdw	1254	4.92	16	1	13.5	3.10	0.67	2.50	157
4H	121	010331-1200-ddk,tm,eb	2697	4.72	16	1	11.5	3.60	0.61	2.50	161
Mean	121		1526	5.35	10	2	13.0	2.93	0.64	2.70	179
Stdev	121		866	0.62	7	1	1.1	0.56	0.06	0.28	28

Bottle ID	Site	date-time-samplerID	Flow (gpm)	pН	Acidity (mg/L)	Alk (mg/L)	TSS (mg/L)	Al (ppm)	Fe (ppm)	Mn (ppm)	SO4 (ppm)
74C	122	000626-1830-xdk	50	7.65	18	51	9.5	0.08	0.4	0.04	27
49 E	122	001001-1900-ddk	16	7.50	5	47	3	0.04	0.29	0.06	27
24G	122	010118-1310-mdw,ddk,jam,bp	35	7.12	4	28	2.5	0.02	0.05	0.02	22
12H	122	010331-1305-ddk,tm,eb	148	7.14	3	21	5.5	0.02	0.18	0.12	24
Mean	122		62	7.35	8	37	5.1	0.04	0.23	0.06	25
Stdev	122		59	0.26	7	14	3.2	0.03	0.15	0.04	2

Bottle ID	Site	date-time-samplerID	Flow (gpm)	рН	Acidity (mg/L)	Alk (mg/L)	TSS (mg/L)	Al (ppm)	Fe (ppm)	Mn (ppm)	SO4 (ppm)
81C	123	000626-1800-xjp	317	6.74	-7	19	12	1.7	0.88	2	179
46 E	123	001001-1815-cam,jm	80	4.77	23	2	21.5	4.70	2.30	5.10	333
34G	123	010118-1240-jam,bp	302	6.03	8	7	12.5	2.00	1.00	2.10	162
22G	123	010331-1227-ddk,tm,eb	606	6.32	-4	11	9.5	1.20	0.60	1.20	90
Mean	123		326	5.97	5	10	13.9	2.40	1.20	2.60	191
Stdev	123		216	0.85	14	7	5.2	1.57	0.76	1.71	102

Bottle ID	Site	date-time-samplerID	Flow (gpm)	рН	Acidity (mg/L)	Alk (mg/L)	TSS (mg/L)	AI (ppm)	Fe (ppm)	Mn (ppm)	SO4 (ppm)
71C	124	000626-1830-xjp	1046	5.28	8	2	6.5	1.2	0.26	2.1	81
55 E	124	001001-1815-ddk,rxs	433	5.16	8	1	1	1.10	0.10	1.70	74
98E	124	010118-1235-ddk,mdw	572	4.78	19	1	5	2.20	0.21	1.90	74
68G	124	010331-1250-ddk,tm,eb	1175	4.67	17	1	4.5	2.60	0.58	1.90	84
Mean	124		807	4.97	13	1	4.2	1.78	0.29	1.90	78
Stdev	124		359	0.29	6	0	2.3	0.74	0.21	0.16	5

Bottle ID	Site	date-time-samplerID	Flow (gpm)	рН	Acidity (mg/L)	Alk (mg/L)	TSS (mg/L)	AI (ppm)	Fe (ppm)	Mn (ppm)	SO4 (ppm)
70C	125	000626-1910-xjp	382	4.08	32		4.5	3.7	0.98	3	136
67 E	125	000930-1930-ddk,rxs	321	4.30	26		6.5	3.00	0.79	2.70	227
33G	125	010118-1140-jam,bp	517	4.08	34		3.5	3.90	0.99	2.90	86
11H	125	010331-1125-ddk,tm,eb	966	3.96	44		5	4.30	1.40	2.80	102
Mean	125		547	4.11	34		4.9	3.73	1.04	2.85	138
Stdev	125		291	0.14	7		1.3	0.54	0.26	0.13	63

Attachment G Comment and Response

Additional information was provided by the Greensburg District Mining Office and was added to the *Recommendations* and *Segments Addressed* sections of the report.

The following comments were submitted by the United States Environmental Protection Agency on February 06, 2003 in regards to the proposed TMDL for Newmyer Run.

1. Please consider adding the sulfate standard to *Table 2* and note the proposed addition of sulfates to §96.3(d).

Sulfate standard added to Table 2. The addition to §96.3(d) is final.

2. In *Attachment D*, page 27, verify that Sampling Point 124 is on Newmyer Run mainstem upstream of Tributary 38309 instead of on the tributary as shown on the map.

Text added to Attachment D.

3. In *Attachment D*, page 28, the load reduction for iron at Point 124 in *Table D3* and *Table D4* should be 1.1#/day, not 1.2#/day.

Corrected.

4. In *Attachment D*, page 33, the allowable load for aluminum at Point 121 (*Table D9*) should be 8.6#.day as shown in *Table D7*, not 9.1#/day. When using the 8.6#/day value instead of the 9.1#/day, the additional removal required at Point 121 is 15.4#/day instead of 14.9#/day.

Corrected.