

FINAL

Coal Bank Run Watershed TMDL
Armstrong County, Pennsylvania

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TABLE OF CONTENTS

Introduction.....	3
Directions to the Coal Bank Run Watershed	3
Segments addressed in this TMDL	3
Clean Water Act Requirements.....	4
303(d) Listing Process.....	5
Basic Steps for Determining a TMDL	5
Watershed History.....	6
AMD Methodology	6
TMDL Endpoints	9
TMDL Elements (WLA, LA, MOS).....	10
TMDL Allocations Summary	10
Allocation Summary	10
Recommendations.....	11
Public Participation	12

TABLES

Table 1. 303(d) Sub-List Central Allegheny River.....	3
Table 2. Applicable Water Quality Criteria	9
Table 3. Summary Table–Coal Bank Run Watershed	11

ATTACHMENTS

<i>Attachment A</i>	14
Coal Bank Run Watershed Map.....	14
<i>Attachment B</i>	16
Method for Addressing Section 303(d) Listings for pH	16
<i>Attachment C</i>	19
TMDLs By Segment	19
<i>Attachment D</i>	22
Excerpts Justifying Changes Between the 1996, 1998, 2002, and 2004 Section 303(d) Lists ..	22
<i>Attachment E</i>	24
Water Quality Data Used In TMDL Calculations.....	24
<i>Attachment F</i>	26
Comment and Response	26

**FINAL TMDL
Coal Bank Run Watershed
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Introduction

This Total Maximum Daily Load (TMDL) calculation has been prepared for segments in the Coal bank Run Watershed (Attachment A). It was done to address the impairments noted on the 1996 Pennsylvania 303(d) list, required under the Clean Water Act, and covers the one listed segment shown in Table 1. Acidic discharge water from abandoned coalmines causes the impairment. The TMDL addresses the three primary metals associated with acid mine drainage (iron, manganese, aluminum), and pH.

Table 1. 303(d) Sub-List Central Allegheny River								
State Water Plan (SWP) Subbasin: 17E								
Year	Miles	Segment ID	DEP Stream Code	Stream Name	Designated Use	Data Source	Source	EPA 305(b) Cause Code
1996	0.5		46263	Coal Bank Run	CWF	303 (d) List	Resource Extraction	pH
1998	0.5		46263	Coal Bank Run	CWF	SWMP	AMD	pH
2002	0.5		46263	Coal Bank Run	CWF	SWMP	AMD	pH
2004	0.6	20030428-0901-ALF	46263	Coal Bank Run	CWF	SWMP	AMD	pH

Cold Water Fishes=CWF
Surface Water Monitoring Program = SWMP
Abandoned Mine Drainage = AMD

Directions to the Coal Bank Run Watershed

Coal Bank Run is located in Bethel Township, southern Armstrong County, which is in southwestern Pennsylvania. The watershed is found entirely on the Leechburg 7.5 minute U.S.G.S. quadrangle map. Coal Bank Run is accessed by taking State Route 66 North from Leechburg, PA about 6 miles to the intersection of Crooked Creek Lake Road. Take park roads about 1½ miles east to the boat launch. The mouth of Coal Bank Run is a short walk east from the parking area at the boat launch.

Segments addressed in this TMDL

The Coal Bank Run Watershed is affected by pollution from AMD. The sources of the AMD are seeps. The seeps are considered to be nonpoint sources of pollution because they are from

abandoned Pre-Act mining operations or from coal companies that have settled their bond forfeitures with the Pennsylvania Department of Environmental Protection (PADEP).

There are no active mining operations in the watershed. All of the 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 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.

The designation for this stream segment can be found in PA Title 25 Chapter 93.

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 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 four 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.).

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 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 305(b) 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.

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 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.

This document will present the information used to develop the Coal Bank Run Watershed TMDL.

Watershed History

The area within the Coal Bank Run Watershed is about 0.6 square miles. Coal Bank Run Flows into Crooked Creek Lake about 4 miles south of Ford City, PA. Crooked Creek Lake is in Crooked Creek Lake Park which is U.S. Army Corp of Engineers Pittsburgh District. The lake is one of 16 flood control projects in the U.S. Army Corp of Engineers Pittsburgh District. It is an important part of the flood protection plan for the Allegheny and Ohio River Valleys. The dam that forms this lake is 7 miles upstream of the confluence of Crooked Creek and the Allegheny River.

The watershed is located in the Appalachian Plateau Physiographic Province. This plateau consists of extensive uplands with several major rivers and associated large streams cutting deeply incised valleys throughout the highlands. The Coal Bank Run watershed is located on the west flank of the Greendale-Sprenkle Mills Anticline. The general strike is north 35° east and the dip in this area is very gentle, usually around 1-2 degrees. The rock and coal formations in this area are from the Allegheny Group. The watershed is forested with a mix of mature hardwoods and small brushy areas. There are eight to ten houses in the western part of this watershed along S.R. 66, but there are no towns or villages. The maximum elevation in the Coal Bank Run watershed is a hilltop of 1,220 feet. The elevation at the mouth of Coal Bank Run is variable because of lake pool elevation changes, but averages 840 feet. A small amount of agriculture is conducted in the southern part of this watershed. The only other non-forested areas nearby are the grassy areas in the park and lawns associated with the houses along Route 66.

There are no current active mining permits in this watershed. The Departments Mylar overlay review shows no known surface or underground mines abandoned or reclaimed. The Bureau of Abandoned Mines E-map site shows one abandoned mine lands (AML) point feature that is an underground mine entry and it is reclaimed.

AMD Methodology

A two-step approach is used for the TMDL analysis of AMD impaired stream segments. The first step uses a statistical method for determining the allowable instream concentration at the point of interest necessary to meet water quality standards. This is done at each point of interest (sample point) in the watershed. The second step is a mass balance of the loads as they pass through the watershed. Loads at these points will be computed based on average annual flow.

The statistical analysis describes below can be applied to situations where all of the pollutant loading is from non-point sources as well as those where there are both point and non-point sources.

The following defines what are considered point sources and non-point sources for the purposes of our evaluation; point sources are defined as permitted discharges, non-point 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 point-source impacts alone, or in combination with 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.

Allowable loads are determined for each point of interest using Monte Carlo simulation. Monte Carlo simulation is an analytical method meant to imitate real-life systems, especially when other analyses are too mathematically complex or too difficult to reproduce. Monte Carlo simulation calculates multiple scenarios of a model by repeatedly sampling values from the probability distribution of the uncertain variables and using those values to populate a larger data set. 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 @Risk¹ by performing 5,000 iterations to determine the required percent reduction so that the water quality criteria, as defined in the *Pennsylvania Code. Title 25 Environmental Protection, Department of Environmental Protection, Chapter 93, Water Quality Standards*, will be met instream at least 99 percent of the time. For each iteration, the required percent reduction is:

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

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

$$Cd = \text{RiskLognorm}(\text{Mean}, \text{Standard Deviation}) \text{ where} \tag{1a}$$

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:

$$LTA = \text{Mean} * (1 - PR_{99}) \text{ where} \tag{2}$$

LTA = allowable LTA source concentration in mg/l

¹ @Risk – Risk Analysis and Simulation Add-in for Microsoft Excel, Palisade Corporation, Newfield, NY, 1990-1997.

Once the allowable concentration and load for each pollutant is determined, mass-balance accounting is performed starting at the top of the watershed and working down in sequence. This mass-balance or load tracking is explained below.

Load tracking through the watershed utilizes the change in measured loads from sample location to sample location, as well as the allowable load that was determined at each point using the @Risk program.

There are two basic rules that are applied in load tracking; rule one is that if the sum of the measured loads that directly affect the downstream sample point is less than the measured load at the downstream sample point it is indicative that there is an increase in load between the points being evaluated, and this amount (the difference between the sum of the upstream and downstream loads) shall be added to the allowable load(s) coming from the upstream points to give a total load that is coming into the downstream point from all sources. The second rule is that if the sum of the measured loads from the upstream points is greater than the measured load at the downstream point this is indicative that there is a loss of instream load between the evaluation points, and the ratio of the decrease shall be applied to the load that is being tracked (allowable load(s)) from the upstream point.

Tracking loads through the watershed gives the best picture of how the pollutants are affecting the watershed based on the information that is available. The analysis is done to insure that water quality standards will be met at all points in the stream. The TMDL must be designed to meet standards at all points in the stream, and in completing the analysis, reductions that must be made to upstream points are considered to be accomplished when evaluating points that are lower in the watershed. Another key point is that the loads are being computed based on average annual flow and should not be taken out of the context for which they are intended, which is to depict how the pollutants affect the watershed and where the sources and sinks are located spatially in the watershed.

In Low pH TMDLs, acidity is compared to alkalinity as described in Attachment B. 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 in units of milligrams per liter (mg/l) CaCO_3 . Statistical procedures are 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 streams affected by low pH may not a true reflection of acidity. This method assures that Pennsylvania's standard for pH is met when the acid concentration reduction is met.

Information for the TMDL analysis performed using the methodology described above is contained in the "TMDLs by Segment" section of this report.

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 acceptable 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 a minimum 99 percent level of protection is required. All metals criteria evaluated in this TMDL are specified as total recoverable. Pennsylvania does have dissolved criteria for iron; however, the data used for this analysis report iron as total recoverable. Table 2 shows the water quality criteria for the selected parameters.

Table 2 Applicable Water Quality Criteria

Parameter	<i>Criterion Value (mg/l)</i>	<i>Total Recoverable/Dissolved</i>
Aluminum (Al)	0.75	Total Recoverable
Iron (Fe)	1.50	Total Recoverable
	0.3	Dissolved
Manganese (Mn)	1.00	Total Recoverable
pH *	6.0-9.0	N/A

*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).

TMDL Allocations Summary

There were not enough samples at any sample point to check for correlation between metals and flow for Coal Bank Run.

Allocation Summary

This TMDL will focus remediation efforts on the identified numerical reduction targets for each watershed. The reduction schemes in Table 3 for each segment are based on the assumption that all upstream allocations are achieved and take in to account all upstream reductions. Attachment C contains the TMDLs by segment analysis for each allocation point in a detailed discussion. As changes occur in the watershed, the TMDLs may be re-evaluated to reflect current conditions. An implicit MOS based on conservative assumptions in the analysis is included in the TMDL calculations.

The allowable LTA concentration in each segment is calculated using Monte Carlo Simulation as described previously. The allowable load is then determined by multiplying the allowable concentration by the flow and a conversion factor at each sample point. The allowable load is the TMDL.

Each permitted discharge in a segment is assigned a waste load allocation and the total waste load allocation for each segment is included in this table. There are currently no active permits in the watershed.

In some instances, instream processes, such as settling, are taking place within a stream segment. These processes are evidenced by a decrease in measured loading between consecutive sample points. It is appropriate to account for these losses when tracking upstream loading through a segment. The calculated upstream load lost within a segment is proportional to the difference in the measured loading between the sampling points.

Table 3. Summary Table–Coal Bank Run Watershed

<i>Station</i>	<i>Parameter</i>	<i>Existing Load (lbs/day)</i>	<i>TMDL Allowable Load (lbs/day)</i>	<i>WLA (lbs/day)</i>	<i>LA (lbs/day)</i>	<i>Load Reduction (lbs/day)</i>	<i>Percent Reduction %</i>
CBR1	Mouth of Coal Bank Run						
	Al	6.5	1.6	0.0	1.6	4.9	71
	Fe	16.0	5.1	0.0	5.1	10.9	68
	Mn	1.2	1.2	0.0	1.2	0.0	0
	Acidity	NA	NA	-	0.0	0.0	0

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.

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 from 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).

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

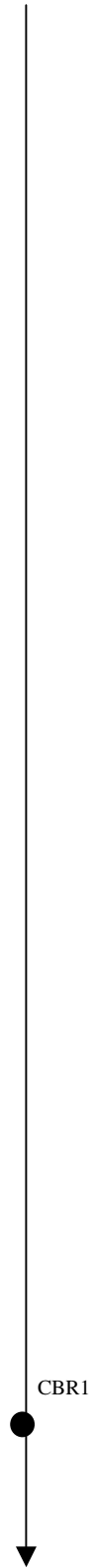
legislative, policy land management initiatives designed to enhance mine operator, volunteer land DEP reclamation efforts. Reclaim PA has the following four objectives.

- 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 remaining risks
- To maximize reclamation funding by expanding existing sources and exploring new sources.

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.

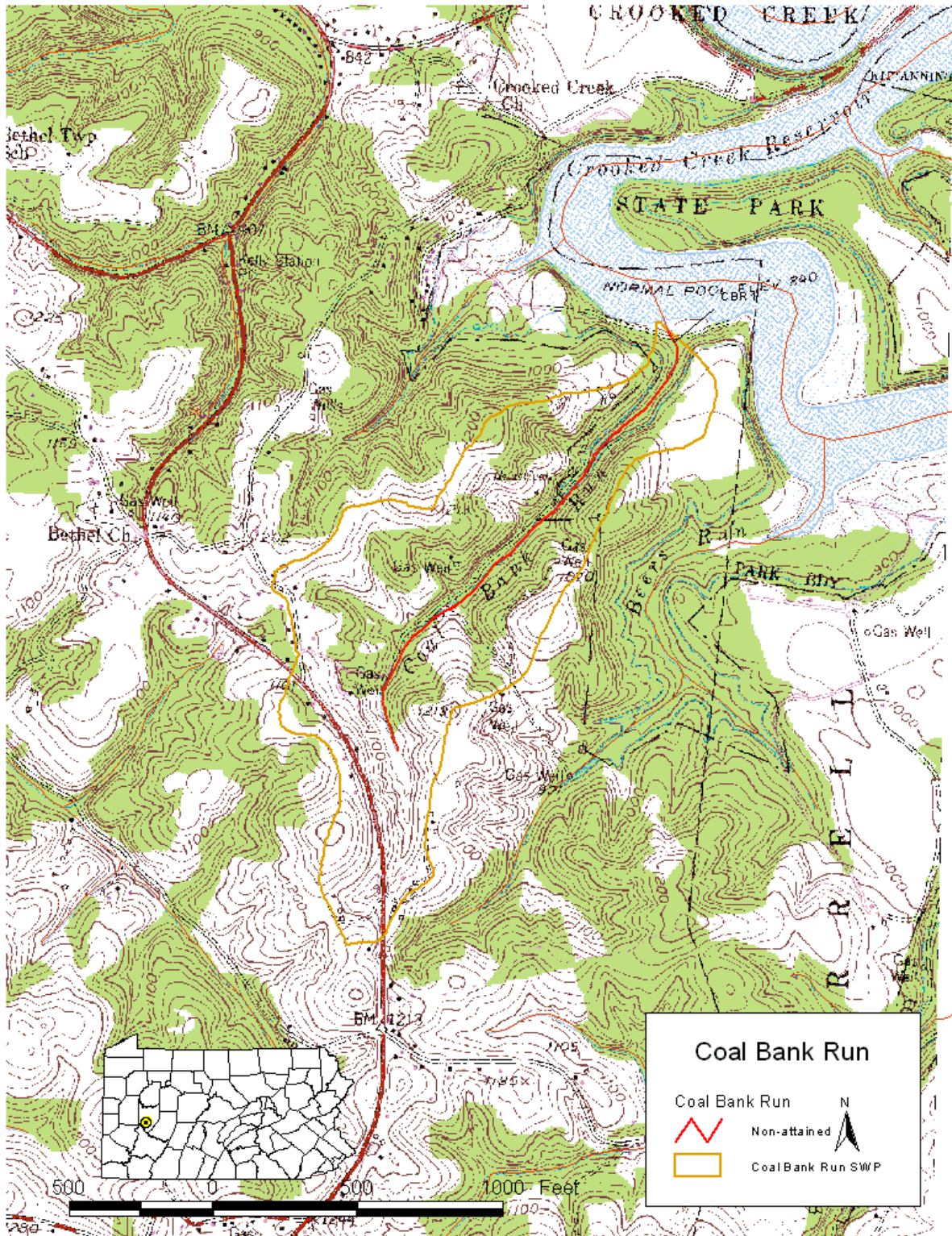
Public Participation

Public notice of the draft TMDL was published in the *Pennsylvania Bulletin* on January 20, 2007 and the *Leader Times*, Kittanning, PA on January 17, 2007 to foster public comment on the allowable loads calculated. A public meeting was held on January 31, 2007 beginning at 1:00 p.m., at the Greensburg District Mining Office, Armbrust Building, 8205 Route 819, Greensburg, PA, to discuss the proposed TMDL.



Attachment A

Coal Bank Run Watershed Map



Attachment B

Method for Addressing Section 303(d) Listings for pH

Method for Addressing 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 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.

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.*

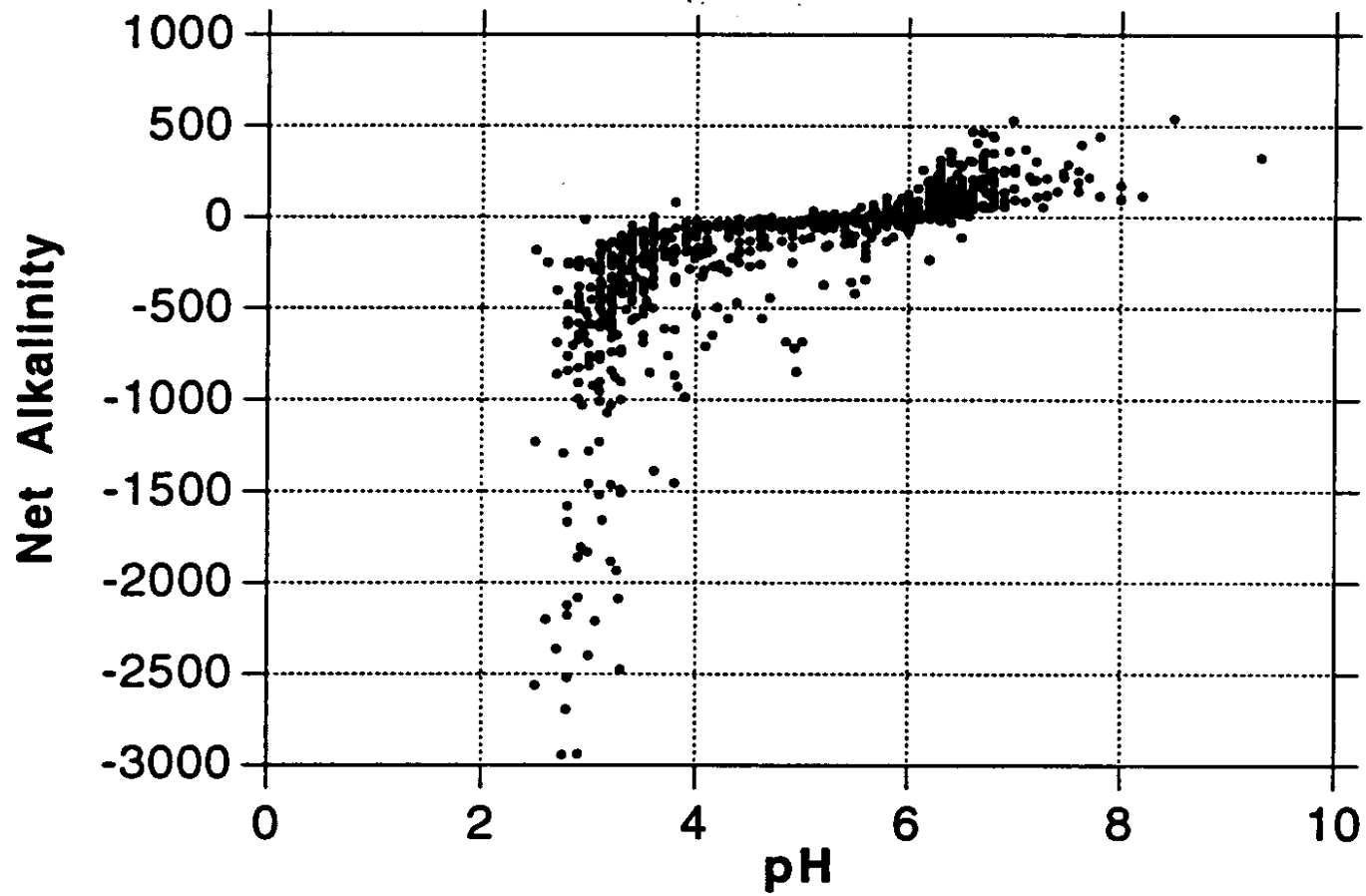


Figure 1. Net Alkalinity vs. pH. Taken from Figure 1.2 Graph C, pages 1-5, of Coal Mine Drainage Prediction and Pollution Prevention in Pennsylvania

Attachment C

TMDLs By Segment

Coal Bank Run

The TMDL for Coal Bank Run consists of load allocations for one sampling site at the mouth of Coal Bank Run.

Coal Bank Run is listed for pH from AMD as being the cause of the degradation to the stream. The method and rationale for addressing pH is contained in Attachment B.

An allowable long-term average in-stream concentration was determined at the points below 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 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.

CBR1 Mouth of Coal Bank Run

The TMDL for this sample point on Coal Bank Run consists of a load allocation to the segment upstream. The load allocation for this segment was computed using water-quality sample data collected at point CBR1. The average flow, measured at the sampling point CBR1 (1.55 MGD), is used for these computations.

There currently is an entry for this segment on the Pa Section 303(d) list for impairment due to pH. Sample data at point CBR1 shows pH ranging between 6.6 and 7.6, pH will not be addressed in this TMDL because Coal Bank Run is net alkaline. The method and rationale for addressing pH is contained in Attachment B.

Parameter	Measured Sample Data		Allowable	
	Conc. (mg/l)	Load (lbs/day)	Conc. mg/l	Load Lbs/day
Al	0.50	6.5	0.15	1.9
Fe	1.24	16.0	0.40	5.1
Mn	0.09	1.2	0.09	1.2
Acid	0.0	0.0	0.0	0.0
Alk	40.19	520.3		

Table C2. Calculation of Load Reductions Necessary at Point CBR1				
	Al (lbs/day)	Fe (lbs/day)	Mn (lbs/day)	Acidity (lbs/day)
Existing Load	6.5	16.0	1.2	0.0
Allowable Load = TMDL	1.9	5.1	1.2	0.0
Load Reduction	4.6	10.9	0.0	0.0
% Reduction Segment	71	68	0	0.0

Margin of Safety (MOS)

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 water-quality 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 added when 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 represent 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 D

**Excerpts Justifying Changes Between the 1996,
1998, 2002, and 2004 Section 303(d) Lists**

The following are excerpts from the Pennsylvania DEP 303(d) narratives that justify changes in listings between the 1996, 1998, 2002, and 2004 list. The 303(d) listing process has undergone an evolution in Pennsylvania since the development of the 1996 list.

In the 1996 303(d) 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 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 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 E
Water Quality Data Used In TMDL Calculations

Coal bank_at crooked creek											
Site	Site Name	Bottle ID	Date-time	Flow (gpm)	pH	Acidity (mg/L)	Alkalinity (mg/L)	Al	Fe	Mn	
1	CBR 1	48B	2/25/2006	96	6.69	-27.07	31.58	0.52	1.2	0.11	
1	CBR 1	4C	4/8/2006	119	7.34	-35.23	39.23	0.19	0.49	0.03	
1	CBR 1	48D	6/2/2006	4898	6.6	-20.8	24.62	1.40	2.7	0.16	
1	CBR 1	32E	8/1/2006	245	7.69	-40.31	45.08	0.13	0.37	0.05	
1	CBR 1	10F	9/22/2006	31	7.53	-56.56	60.47	0.26	1.42	0.12	
avg=				1077.80	7.18	-35.99	40.19	0.50	1.24	0.09	
stdev=						13.73		0.52	0.93	0.05	

Attachment F
Comment and Response

No comments were received.