FINAL REPORT

A Survey of the Water Quality of Streams in the Primary Region of Mountaintop / Valley Fill Coal Mining

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Mountaintop Mining / Valley Fill Programmatic Environmental Impact Assessment

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1. SUMMARY

1.1 Background

The Project Plan was designed to characterize and compare impacts to stream chemistry from mountaintop mines and associated valley fills (MTM/VF). This study used the same 37 stream monitoring sites used in the aquatic biology study of this same region. Most sites were visited, sampled, and had flow rate measured 13 times between October 1999 and February 2001 by field crews who are Mine Inspectors for the state of West Virginia. Four field parameters and 37 laboratory parameters were selected to be monitored at each site. Ten of those parameters had stream water quality criteria limits which were used to set measurement detection limits. One set of duplicate samples and two blank samples were to be collected each day by each field crew to enable assessment of sampling errors and sampling precision. The field work exceeded the goal of 90% completeness for site visits, steam sampling, flow measurements, and duplicate samples, but only 83 % of the number of blank samples were collected.

The contract for chemistry analyses was changed to a second laboratory in July 2000. EPA Region III chemists provided a QA/QC review of the laboratory data. Only 83 % of the values reported by the first laboratory passed the QA/QC review. The second laboratory had 98% of their data pass the QA/QC review. Corrective actions were implemented during the study to resolve problems in the field and laboratory. The data from this study is stored in a relational database which is part of this report.

1.2 Evaluation of Results

The results were evaluated and are presented under three lines of reasoning: 1) parameters altered by MTM/VF mining; 2) parameters violating stream water quality standards; 3) parameters not detected in any sample. Parameters likely to be impacted by MTM/VF mining were identified and used as an outline for evaluating the entire database from all categories of sites. Variations in data quality were assessed using the results of the duplicate samples and blank samples. Additional characterization of the categories of sites is provided by calculation of "Yield"rates, an idea taken from a USGS publication.

The data indicate that MTM/VF mining activities increase concentrations of the several parameters in streams. Sites in the category Filled had increased concentrations of the following parameters: sulfate, total calcium, total magnesium, hardness, total dissolved solids, total manganese, dissolved manganese, specific conductance, total selenium, alkalinity, total potassium, acidity, and nitrate/nitrite. There were increased levels of sodium at sites in the category Filled/Residences which may be caused by road salt and/or sodium hydroxide treatment of mine discharges.

The data were inconclusive for several other parameters which were detected in only a few

samples or at very low concentrations. Those parameters: total phosphorous, total copper, total lead, total nickel, total barium, total zinc, total organic carbon, dissolved organic carbon, and total suspended solids. Other parameters were detected but there was no clear indication of stream impacts resulting from MTM/VF mining operations. Those parameters are: chloride, total aluminum, dissolved aluminum, total iron, dissolved iron, temperature, dissolved oxygen, and pH. Data from the second laboratory indicated that only three samples for total aluminum exceeded the stream criterion and all were collected August 9, 2000at sites with fills upstream. Dissolved aluminum was detected in only five samples and all were near the detection limit of 100 ug/L. There were no samples for total iron exceeding the stream criterion but several samples in the category Filled approached the limit in the fall of 2000. Dissolved iron was detected at a few sites in the category Filled at levels slightly higher than other sites. MTM/VF mining operations can increase iron concentrations in streams but there is no clear evidence that this occurred during the study. Temperature, pH, conductivity, and dissolved oxygen were measured in the field. The only field parameter clearly impacted by MTM/VF mining was conductivity which was noticeably increased at sites in the category Filled.

Parameters which were not detected in any sample analyzed at the second laboratory were: total arsenic, total antimony, total cadmium, total chromium, total cobalt, total vanadium, total thallium, total beryllium, total mercury, and total silver. Hot acidity was analyzed for a few samples and none was detected.

Only the data from the second half of the study was used to evaluate compliance with stream limits due to problems with contamination in blanks, excessive holding times and less precision which occurred during the first part of this study. The latter data indicate that MTM/VF mining is associated with violations of the stream water quality criteria for total selenium. Selenium violations were detected in each of the five study watersheds and all were at sites in the category Filled, downstream of MTM/VF operations. No other site categories had violations of the selenium limit. There were no violations of the limits for total beryllium, chloride, total mercury, total silver, temperature. The data do not support a conclusion regarding stream water quality violations for aluminum, dissolved oxygen, iron and pH which can be impacted by MTM/VF mining activities.

While outside the scope of this report, there would be value in having experts evaluate the flow rate data from this study to identify impacts attributable to mining. Base flows of streams with valley fills are reported to be 6 to 7 times greater than the base flows of unmined areas. During base flow conditions, the more highly mineralized water from fills becomes a larger portion of stream flow, altering the stream water chemistry.

2. STUDY OBJECTIVES

The final Project Plan for this study listed two objectives:

- Characterize and compare conditions in three categories of streams:
 - 1) streams that are not mined;
 - 2) streams in mined areas with valley fills; and
 - 3) streams in mined areas without valley fills.
- Characterize conditions and describe any cumulative impacts that can be detected in streams downstream of multiple fills.

This study was designed to supplement other studies of stream water quality impacts resulting from mountaintop mining and valley fill (MTM/VF) coal mining operations. This study compliments the aquatic biology study for this same region by gathering chemistry data on the same stream sites used by USEPA Biologists in their evaluation of MTM/VF impacts to aquatic organisms. The aquatic biology study report by Green, Passmore, and Childers is titled A Survey of the Condition of Streams in the Primary Region of Mountaintop Mining/Valley Fill Coal Mining. A separate report is being prepared to evaluate the relationships between the chemical data and biological data.

3. THE PROJECT PLAN

A Project Plan was drafted for this study in the summer of 1999 under the direction of the Environmental Impact Statement Steering Committee. The plan was posted on EPA Region III's web site. The plan was revised several times as the study progressed in response to comments and problems encountered during the study.

3.1 Monitoring Sites Description

The thirty seven (37) stream monitoring sites are exactly the same sites used by the USEPA Biologists in their study of MTM/VF. They provide a synoptic survey of stream conditions in five watersheds across the primary MTM/VF region in West Virginia. These watersheds are Twentymile Creek, Clear Fork, Island Creek, upper Mud River and Spruce Fork. The locations of the sites are shown in Figure 1. They are spread across the region of mountaintop mining in West Virginia. The sites were selected with the experienced assistance of WVDEP Mine Inspectors familiar with mining activities in the region and with the cooperation of coal companies in the area.

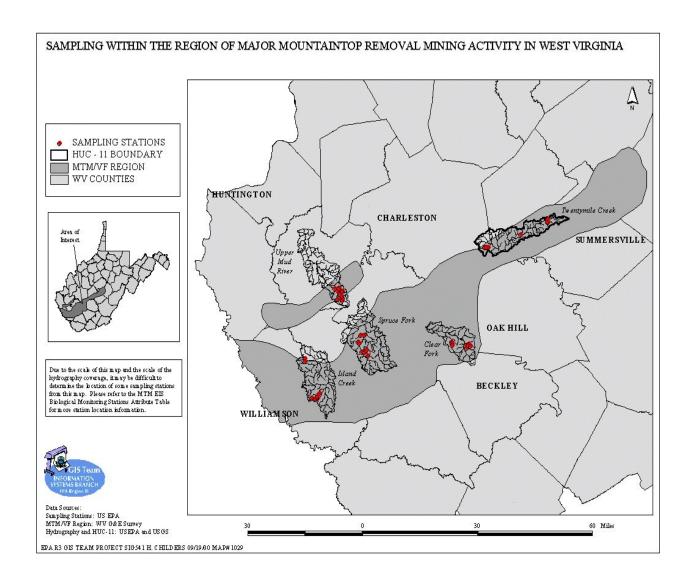


FIGURE 1. Map of Stream Sampling Site Locations

The distribution of sites within the three categories identified in the study objectives are:

1) streams that are not mined - Unmined - 9 sites
2) streams in mined areas with valley fills - 21 sites

(Filled 15sites + Filled/Residences 6 sites)

3) streams in mined areas without valley fills - 6 sites

(Mined 4 sites + Mined/Residences 2 sites)

Flow diversion ditch at a valley fill - 1 site

TOTAL 37 sites

The site numbers and descriptions are listed in Table 1. The station numbers are not sequential since the 37 biological sampling sites were chosen from 127 possible sampling sites. The sizes of the drainage areas upstream of the sites vary from 125 acres to 27,742 acres. Only three of the 37 sites have watersheds larger than 3,200 acres.

TABLE 1 Monitoring Site Attributes

| | Wionitoring Site Attributes | | | | | | | |
|------------------------|-----------------------------|------------------|-----------------|-----------------|--------------------------------|------------------|-------------------|---------------------|
| Site Identification | EIS Class | Watershed | Area (acres) | No. of Fills | Comment/ Permit Date | No. of Visits | No. of Samples | No. of Flowrates |
| MT-01 | Mined/Residence | upper Mud River | 1,897 | | Past Logging | 13 | 13 | 12 |
| MT-02 | Unmined | upper Mud River | 511 | | Past Logging | 13 | 13 | 12 |
| MT-03 | Unmined | upper Mud River | 717 | | Past Logging | 13 | 13 | 12 |
| MT-13 | Unmined | upper Mud River | 335 | | Past Logging | 13 | 12 | 12 |
| MT-14 | Filled | upper Mud River | 1,527 | 8 | '85,' 88, '89 | 13 | 13 | 12 |
| MT-15 | Filled | upper Mud River | 1,114 | 6 | '88,'89,'91,'92'95 | 13 | 13 | 12 |
| MT-18 | Filled | upper Mud River | 479 | 2 | '92, ''95 | 13 | 13 | 13 |
| MT-23 | Filled/Residence | upper Mud River | 10,618 | 26 | '85,'88,'89,'91'92,'95 ,'96 | 13 | 13 | 12 |
| MT-24 | Ditch | upper Mud River | N/A | 1 | '88, '91 | 13 | 13 | 13 |
| MT-25B | Filled | Spruce Fork | 997 | 1 | ' 86 | 13 | 13 | 13 |
| MT-32 | Filled | Spruce Fork | 2,878 | 5 | '86,'88,'89,'91 | 13 | 13 | 13 |
| MT-34B | Filled | Spruce Fork | 1,677 | | '85, '86 | 13 | 13 | 13 |
| MT-39 | Unmined | Spruce Fork | 669 | | | 13 | 13 | 13 |
| MT-40 | Filled/Residence | Spruce Fork | 11,955 | 10 | 7 VF + 3 refuse | 13 | 13 | 13 |
| MT-42 | Unmined | Spruce Fork | 447 | | | 13 | 13 | 12 |
| MT-45 | Mined | Spruce Fork | 1,111 | | '87 strip @ head | 13 | 13 | 13 |
| MT-48 | Filled/Residence | Spruce Fork | 27,742 | 22 | 4 communities | 13 | 13 | 13 |
| MT-50 | Unmined | Island Creek | 563 | | | 13 | 13 | 12 |
| MT-51 | Unmined | Island Creek | 1,172 | | gas well | 13 | 11 | 10 |
| MT-52 | Filled | Island Creek | 316 | 1 | underground entry & fill / '84 | 13 | 13 | 13 |
| MT-55 | Filled/Residence | Island Creek | 3,167 | 5 | '86,'88,''89, '93, '94, '98 | 13 | 13 | 12 |
| MT-57B | Filled | Island Creek | 125 | 1 | '88 | 12 | 12 | 11 |
| MT-60 | Filled | Island Creek | 790 | 2 | '88, '93 | 13 | 13 | 12 |
| MT-62 | Filled/Residence | Clear Fork | 3,193 | 11 | '89,'91,'92 | 14 | 14 | 14 |
| MT-64 | Filled | Clear Fork | 758 | 5 | '92, '93 | 14 | 14 | 14 |
| MT-69 | Mined/Residence | Clear Fork | 708 | | pre- '65 | 14 | 14 | 14 |
| MT-75 | Filled/Residence | Clear Fork | 876 | 5 | '89, '92 | 14 | 14 | 14 |
| MT-78 | Mined | Clear Fork | 524 | | pre- '65 | 14 | 2 | 2 |
| MT-79 | Mined | Clear Fork | 448 | | | 14 | 14 | 14 |
| MT-81 | Mined | Clear Fork | 1258 | | NaOH / pre '65 | 14 | 14 | 14 |
| MT-86 | Filled | Twentymile Creek | 2,201 | 3 | NaOH/ '90,'93 | 14 | 14 | 14 |
| MT-87 | Filled | Twentymile Creek | 752 | 3 | NaOH/'90,'93 | 14 | 14 | 14 |

| MT-91 | Unmined | Twentymile Creek | 1,302 | | haul road | 14 | 14 | 14 |
|--------|----------|------------------|-------|---|-------------|-----|-----|-----|
| MT-95 | Unmined | Twentymile Creek | 968 | | logging? | 14 | 14 | 14 |
| MT-98 | Filled | Twentymile Creek | 1,208 | 8 | '77,'82,'90 | 14 | 14 | 14 |
| MT-103 | Filled | Twentymile Creek | 1,027 | 6 | '77,'82,'90 | 14 | 14 | 13 |
| MT-104 | Filled | Twentymile Creek | 2,455 | 8 | '77,'82,'90 | 14 | 14 | 14 |
| Totals | 37 sites | | | | | 494 | 479 | 466 |

3.2 Monitoring Frequency

Stream samples were collected during the period of October 1999 thru February 2001. The sites were to be sampled monthly but the scheduling of when samples were taken was determined by availability of the field crews. The stream sampling effort was stopped in May 2000 due to problems with timely delivery of chemistry laboratory data. A contract was completed with a different laboratory and monthly sampling resumed in August 2000 and continued through February 2001. Most sites were visited 13 times for sampling. One field crew took an additional set of samples from the seven sites in Twentymile Creek in November 1999 and another crew took an additional set of sample from the seven sites in Clear Fork in June of 2000. A few times, some of the sites had no flow to sample. The field crew found stream flow on only two occasions at site MT-78. There were 479 stream samples collected in this survey, not counting the duplicates and other QA samples. Flow measurements were also made during sampling but there were several occasions when flows were not measured. This was especially true during winter months when the stream was frozen over. There were 467 flow measurements for this study. Table 1 lists this information for each sample site.

3.3 Monitoring Parameters and Sampling Methods

The parameters to be monitored were discussed by numerous groups and experts. The list of parameters finally selected was shaped by constraints of holding times, detection limits, difficulty in sampling and other factors. The discussion on what parameters to monitor began with a review the stream water quality parameters for the streams in the study area.

3.3.a Stream Water Quality Criteria

There are limits set on the concentrations of chemicals allowed in streams across the nation. Each State has established these stream water quality criteria for the surface waters of their State. West Virginia has three categories of stream water quality criteria set to protect specific water uses. Those categories of water uses are: 1) Aquatic Life, 2) Human Health, and 3) All Other Uses. The Aquatic Life Criteria are the limits most applicable to this study because those are designed to protect aquatic life in the stream. There can be separate limits for warm water and cold water (trout) streams. Sometimes there are also separate limits for acute and chronic exposure. Acute exposures would be those experienced during a short time period such as a spill. Chronic limits are usually lower than Acute limits since the organisms are exposed for a

longer time period. Water quality criteria also vary with sample methods. Some criteria specify "Not to exceed" which is a grab sample of the stream. These criteria are applicable to the sampling methods used in this study. There are also some criteria set for a "one-hour average" which are not strictly applicable to the single grab sample results of this study, but they are still valuable in evaluating if there are concerns about the concentrations of chemicals identified in this study. The West Virginia Water Quality Criteria limits are discussed in Attachment 1.

3.3.b Mining Permit Monitoring

Coal companies seeking permits must monitor streams above and below their proposed mining sites as part of the process for getting a mining permit. It was agreed that the list of parameters being monitored for permits would be expanded to include the parameters being monitored in this study. Discussions with coal companies were held to invite their comments on the list of parameters. This list of "interim protocol" parameters was adopted for coal companies seeking permits in West Virginia. They were asked to monitor for the list of "interim protocol" parameters as part of their pre-mining data gathering effort. The data gathered by the coal companies and their consultants could also be used to in evaluating the impacts of mining but that data has not been included in this report. A separate report is being prepared using coal company data for this EIS effort.

3.3.c Laboratory Parameters

After much discussion and evaluation, the 37 chemical parameters listed below were selected for laboratory analyses. The samples were to be collected and preserved and analyzed following procedures consistent with 40 CFR Part 136.

Water Quality (10)

| Acidity | Nitrate + Nitrite | Total Organic Carbon |
|------------|-------------------|--------------------------|
| Alkalinity | Sulfate | Dissolved Organic Carbon |

Chloride Total Suspended Solids Hardness Total Dissolved Solids

Total Metals (27)

| Aluminum | Cobalt | Nickel |
|--------------------|---------------------|-------------|
| Dissolved Aluminum | Copper | Potassium |
| Antimony | Iron | Phosphorous |
| Arsenic | Dissolved Iron | Selenium |
| Barium | Lead | Silver |
| Beryllium | Magnesium | Sodium |
| Cadmium | Manganese | Thallium |
| Calcium | Dissolved Manganese | Vanadium |
| Chromium | Mercury | Zinc |

Hot acidity was also analyzed for a brief period by the second laboratory by mistake.

3.3.d Field Parameters

Field crews were WVDEP Mine Inspectors. They were briefed in the standard monitoring procedures at the start of this study. The briefing included instructions in measuring Dissolved Oxygen, Specific Conductivity, Temperature, and pH *in situ* using calibrated electrometric field meters. The field chemistry measurements taken at each sampling site were consistent with 40 CFR Part 136. The field crew recorded measurements and other sample site information on field sheets which were sent to the lab with the samples. They also measured flow rate at the time of sampling using methods suitable for effluent discharge monitoring under the NPDES program. EPA office staff used a computer program to calculate stream flows from the field stream gaging data. A copy of the blank field sheets used in this study is included as ATTACHMENT 2.

3.4 Stream Sample Collection and Shipping

The laboratory provided sample containers, chemical preservatives, lab-pure water, labels, and shipping containers. They were shipped to the WVDEP field offices. The sampling procedures used were consistent with the 40 CFR Part 136 and samples were collected as grab samples in mid-stream. The samples were preserved and stored on ice in the shipping containers until they were ready to ship to the lab following chain-of-custody procedures. A separate field sheet for each sample, as shown in Attachment 2, was to be placed in the shipping containers.

3.5 Methods and Detection Limits for Water Quality Criteria Parameters

Ten of the parameters monitored during this study have an applicable stream water quality criteria. These criteria were used to select methods of analysis and detection limits for the laboratory analyses. The concern was that values reported by the laboratory as exceeding the stream criteria would be measured precisely enough to confidently say that stream criteria were exceeded. Therefore the detection limit or lowest measurable concentration reported by the laboratory was arbitrarily designated to be no greater than one third of the lowest applicable water quality criterion. The detection limit for this study was set after discussions with chemists as to what detection limits are achievable following excellent laboratory practices. The method selected and the detection limit for each parameter with a criterion are included in Table 2.

TABLE 2
Water Quality Criteria and Method Detection Limits

| | Water Quality | | |
|-------------------|------------------|---------------|------------------------|
| <u>Parameter</u> | <u>Criterion</u> | <u>Method</u> | Detection Limit |
| Total Aluminum | 750 ug/L | EPA 200.7 | 100 ug/L |
| Total Beryllium | 130 ug/L | EPA 200.7 | 1 ug/L |
| Chloride | 230 mg/L | EPA 300.0 | 5.0 mg/L |
| Dissolved Oxygen* | 5.0 mg/L | Field Meter | 0.1 mg/L |
| Total Iron | 1.5 mg/L | EPA 200.7 | 0.10 mg/L |
| Total Mercury | 2.4 ug/L | EPA 245.1 | 0.2 ug/L |
| pH* | 6.0 to 9.0 | Field Meter | 0.1 pH unit |
| Total Selenium | 5 ug/L | EPA 200.8 | 3 ug/L** |
| Total Silver | 1 to 43 ug/L | EPA 200.7 | 10 ug/L |
| Temperature* | 73° or 87° F | Field Meter | +/- 2° F |

^{*} Field meter required to measure these parameters.

4. DATA QUALITY REQUIREMENTS AND ASSESSMENTS

4.1 Field Work

The field work was conducted by personnel from the West Virginia Division of Environmental Protection, Office of Mining & Reclamation and reviewed by the EPA staff.

4.1.a Field Work Completeness Assessment

The project plan requires a monthly visit to each site, a sample from each site when there is flow, and a flow measurement. The field data are recorded on field sheets for each sample. The field crews sent copies of their field sheets to the EPA as well as to the contract labs with the samples. The EPA monitored the progress of the field work by reviewing and evaluating these field sheets. Some crews also reported problems and progress through telephone conversations with the EPA.

The data and notes from the field sheets was transferred to the electronic database by the EPA staff. All flow rates were calculated from the field readings by laboratory personnel or EPA staff using the same computer program. The electronic records were then completely checked for data entry errors. These records were then used to cross check the records and data received from the laboratories and the QA/QC review. The calibration records for field meters were not included in the electronic database of data for this study, but the comments from the field sheets are included

^{**} The estimated instrument detection limit for selenium in water using Method 200.8 (Inductively Coupled Plasma - Mass Spectrometry) is around 5 ug/L according to the 1983 EPA Methods Manual

4.1.b Field Work Sampling Errors Assessment

The Project Plan specified three types of OA samples be collected by each crew each day of sampling. Field Duplicate Samples were collected as two identical sets of stream samples from a stream monitoring site. The second set was labeled as a Duplicate Sample. The concentrations of each parameter in these pairs of Duplicate Samples should be nearly identical. Blank **Samples** were collected in a set of sample containers using lab-pure water from the laboratory and preserving them just like the stream samples, including filtering. These samples were called Blanks and the concentration of all parameters in each sample should be at or near the detection limit. The third type of QA sample used in this survey was a Trip Blank Sample. This was a set of sample containers filled with lab-pure water in the laboratory and sent to the field crews with the other sample containers and preservatives. This Trip Blank was opened in the field at the sample site and preserved as the stream samples, except there was no water filtered in the field in the Trip Blank. Any measurable concentrations parameters in these blank samples would indicate concerns with sample handling or contaminated sampling equipment. QA samples were tested in the laboratory for the same parameters as the stream samples. Although the QA samples were collected to evaluate problems with sample collection and handling in the field, they can also be used to detect errors in measurement which occur in the laboratory.

4.1.c Field Duplicates

Field Duplicate data can be used to calculate an estimate the precision of sampling methods. This estimate of precision includes error associated with field collections at the site, error in sample handling, and error associated with laboratory activities as well as true variation in the water being sampled. Since it is not possible to separate the variation caused by sampling error or sample handling error from the variation caused by measurement error, the differences between sets of duplicate samples can only give an estimation of precision in sampling. The estimate of precision in this study is based on laboratory results of Field Duplicate samples. Field Duplicate samples were to be collected at 10% of the sites on each sampling occasion (one Field Duplicate per sampling crew per day). Only the first of the two sets of sample results was used in calculating and evaluating the monitoring trends and statistics for a site.

Precision estimates were calculated from the data for Field Duplicate samples using **Relative Percent Difference (RPD)**. RPD is calculated using the following equation:

RPD =
$$((C_1 - C_2)x100)$$
÷ $((C_1 + C_2)/2)$
where: C_1 = the larger of the two values and C_2 = the smaller of the two values.

Often the smaller of the two values was below the minimum concentration the laboratory could detect (called the Detection Limit or DL). In calculating statistics on the concentration at a site, every time a reported value was below the DL, a value of one half the DL was assigned as the

smaller value (C_2) , rather than zero. The RPD varies with each parameter and for each set of duplicates. There are tables of RPD results for selected parameters in this report under the section Evaluation and Discussion of Results. As the concentrations in the duplicate samples approach the detection limit, the RPD values are not as meaningful an estimate of precision. There is a trend in the data from this study for the RPD to improve (get much lower) with later samples. This may be due to improvements in sample collection and handling in the field and laboratory or due to differences between the laboratories.

There is also a trend in the results from this study for the concentrations to be lower in the second half of the study. This may be due to lingering effects of the drought conditions experienced just before the beginning of the sampling in 1999. It could also result from improvements in sample collection and handling in the field and laboratory as the study progressed. It could also be due to differences between the two laboratories. There were detectable concentrations of arsenic, cadmium, lead, manganese, silver and thallium in results from the first laboratory but the second laboratory found no detectable concentrations of these metals in any samples. The first laboratory also reported generally higher concentrations of antimony and nickel than the second laboratory.

Another way to evaluate precision is to **plot concentration of duplicate samples**. The X-axis is the concentration of the first sample and the Y-axis is the concentration of second sample A point is plotted for each set of duplicate samples. If the values for all sets of duplicate samples are equal, they will make a straight line from the detection limit to the maximum value detected. This approach can be used on duplicate samples of stream samples as well as the duplicate sets of blank samples.

It is recognized that even the best laboratories can not "hit a bulls eye" every time with analytical tests so the study plan allows for a general "precision limit" of plus or minus 25%. The precision limits can also be plotted on the graph of duplicate sample results to illustrate when values of duplicate samples are "out of control" or beyond the precision limit. Graphs of duplicate sample results have been plotted for various parameters using a unique symbol for each laboratory. Errors in sample collection or handling in the field may cause duplicate samples to be "out of control," but the problem may also be in the laboratory. The plots of duplicate sample results also indicate the precision of the sampling at the second laboratory was much better than the first. This may be due to improvements with experience in collecting and handling samples in the field or it may be related to the laboratory. The end result is that there is more confidence in the precision of sample data from the later portion of the study. There were twice as many duplicate samples analyzed at the second laboratory and the sites were more varied with fewer Unmined sites. As a result the range of concentrations in duplicates is generally wider than at the first laboratory.

4.1.d Blanks

Field crews were to collect two blanks each day they sampled. Not all field crews were equally diligent in collecting and identifying Blank Samples. Problems were identified with each crew not always having the supply of lab pure water and adequate sample containers when they needed them. There were also other communication problems. There were intermittent problems with unacceptable concentrations of contaminants in the blank samples. Some problems were thought to have been caused by field errors such as putting the acid preservatives in the wrong bottle, but this was not confirmed. There was also an intermittent problem with inadequate supplies of lab pure water for blanks and at least one crew noted they purchased distilled water on two occasions to use in the blanks. The quality of the blank water was sometimes questioned by chemists running the samples. The data for all Field Blank samples has been evaluated as a group to identify variability among the parameters. The number of Field Blank samples with detectable concentrations of contamination for each laboratory are listed by parameter in Table 3.

Within the group of blank samples there were 28 pairs of duplicate blanks. These were duplicates for all parameters except those which were filtered in the field. The graph plots of these "duplicate blanks" for selected parameters are included in this report under the section Evaluation and Discussion of Results. The precision and amount of contamination revealed in these graphs indicates that the contamination of blanks decreased in data from the second laboratory. This could be due to improvements in sample handling in the field or in the laboratory. The end result is that there is less contamination of blank samples during the later portion of the study, and there are several parameters which have unreliable results from the first laboratory. The parameters with unreliable results from the first half of this study included acidity, alkalinity, antimony, arsenic, lead, phosphorous, potassium, selenium, thallium, and most critically both suspended and dissolved solids.

The Project Plan calls for sample results from a site to be "flagged" when the concentration of a parameter in the blank (field or laboratory blank) exceeds 1/10th of the value reported in the stream sample. The electronic spreadsheet of the data included as ATTACHMENT 3 has a column identifying all "flagged" data. The code letter "B" identifies results with problems with the excessive contamination in the blank samples.

TABLE 3
Contamination Detected in Blanks

| | Contamination Detected in Dianks | | | | | | | |
|--|----------------------------------|------------------------|--|--|--|--|--|--|
| | LAB 1 | LAB 2 | | | | | | |
| PARAMETER | Number From 30 | Number From 50 | | | | | | |
| | Samples Greater Than | Samples Greater Than | | | | | | |
| | Detection Limit | Detection Limit | | | | | | |
| ACIDITY | 28 | 0 | | | | | | |
| ACIDITY HOT | | 0* | | | | | | |
| ALKALINITY | 28 | 0 | | | | | | |
| ALUMINUM, DISSOLVED | 4 | 1 | | | | | | |
| ALUMINUM, TOTAL | 3 | 3 | | | | | | |
| ANTIMONY, TOTAL | 24 | 0 | | | | | | |
| ARSENIC, TOTAL | 25 | 0 | | | | | | |
| BARIUM, TOTAL | | 0 | | | | | | |
| BERYLLIUM, TOTAL | 0 | 0 | | | | | | |
| CADMIUM, TOTAL | 0 | 0 | | | | | | |
| CALCIUM, TOTAL | 13 | 0 | | | | | | |
| CHLORIDE | 5 | 0 | | | | | | |
| CHROMIUM, TOTAL | 8 | 0 | | | | | | |
| COBALT, TOTAL | | 0 | | | | | | |
| COPPER, TOTAL | 3 | 2 | | | | | | |
| DISSOLVED, ORGANIC CARBON | 3 | 4 | | | | | | |
| IRON, DISSOLVED | 1 | 0 | | | | | | |
| IRON, TOTAL | 4 | 1 | | | | | | |
| LEAD, TOTAL | 24 | 1 | | | | | | |
| MAGNESIUM, TOTAL | 8 | 0 | | | | | | |
| MANGANESE, DISSOLVED | 1 | 0 | | | | | | |
| MANGANESE, TOTAL | 3 | 1 | | | | | | |
| MERCURY, TOTAL | 0 | 1 | | | | | | |
| NICKEL, TOTAL | 12 | 0 | | | | | | |
| NITRATE | 5* | 0* | | | | | | |
| NITRITE | 0* | 0* | | | | | | |
| NITRATE+NITRITE | 0* | 0* | | | | | | |
| PHOSPHORUS, TOTAL | 22 | 0 | | | | | | |
| POTASSIUM, TOTAL | 28 | 0 | | | | | | |
| SELENIUM, TOTAL | 21 | 1 | | | | | | |
| SILVER, TOTAL | 0 | 0 | | | | | | |
| SODIUM, TOTAL | 15 | 0 | | | | | | |
| SULFATE | 1 | 0 | | | | | | |
| THALLIUM, TOTAL | 20 | 0 | | | | | | |
| TOTAL DISSOLVED SOLIDS | 27 | 1 | | | | | | |
| TOTAL ORGANIC CARBON | 3 | 2 | | | | | | |
| TOTAL SUSPENDED SOLIDS | 26 | 0 | | | | | | |
| VANADIUM, TOTAL | | 0 | | | | | | |
| ZINC, TOTAL * The number of Blank samples for the | 11 | 9 | | | | | | |

^{*} The number of Blank samples for these parameters is less than for other parameters.

4.1.e Field Work Completeness Evaluation

Completeness is a quality assurance/quality control term and is defined as the measure of the amount of valid data obtained from a measurement system compared to the amount that was expected to be obtained under normal conditions. Completeness was measured by calculating what percentage of samples were collected and analyzed with valid results. The goal for this project was 90% completeness. Completeness is calculated according to the following equation.

C = 100 x (V/N)

where: C = percent completeness

V = number of measurements judged valid

N = total number of measurements.

The percent completeness was calculated for the field work and is presented in Table 4.

TABLE 4
Field Work Data Summary

| Tiera work Data Summary | | | | | | | |
|-----------------------------------|---------------------|--------------------------|--|--|--|--|--|
| Factor Being Measured | Numbers (V and N) | Percent Completeness | | | | | |
| Attempted Visits to Sites | 495 of 495 | 100 | | | | | |
| Actual Visits to Sites | 494 of 495 Attempts | 99.8 | | | | | |
| Number of Times Sites Dry @ Visit | 15 | N/A | | | | | |
| Number of Samples at Sites | 479* of 494 Visits | 97.0 | | | | | |
| Number of Flow Measurements | 466 of 479 Samples | 97.3 | | | | | |
| Number of Duplicate Sample Sets | 44 of 479 Samples | 9.18% / 10% Goal = 91.8% | | | | | |
| Number of Blank Samples | 80 of 479 Samples | 16.7% / 20% Goal = 83.5% | | | | | |

^{*}Excluding the Duplicate and Blank samples.

The field work was especially complete in this study. There was only one occasion during this entire survey when a field crew could not reach a site. A tree had fallen and blocked the road to site MT-57B on September 28, 2000. The percent completeness is 494 visits out of 495 attempts or 99.8 %. This was excellent and greatly exceeded the goal of 90% completeness.

Samples were collected at all sites on every visit unless the streams were dry. Site MT-78 was dry12 times in this study. In the entire study, there were only 15 site visits which found no stream flow. There were 479 stream samples collected in this survey, not counting duplicates and other QA samples. The percent completeness is 479 samples out of 494 visits or 97.0 %. This was excellent.

Flow rate was to be measured on each sampling occasion. The crews were generally able to measure flows with each round of sampling. However, when they made the sample runs in January of 2001 they found 12 stream sites were covered with ice and stream flows were not measured. The total number of missed flow measurements in this study was only 13. The percent completeness is 466 flows out of 479 samples or 97.3 %. This was also an excellent effort from the field crews.

The goal for field duplicate samples listed in the project plan was to have duplicate analyses performed on 10% of the sites on each sampling occasion. Field crews did not collect any duplicate samples until March 2000 due to several problems with supplying an adequate number of sample containers as well as confusion. From March 2000 on, the crews sampled duplicates as in the work plan. There were 44 duplicates for 479 samples so overall the study performed duplicate analyses on 9.18 % of the sites sampled.

The work plan did not list a numeric goal for the collection of blank samples but the ideal number of blanks should have been 20% of the number of samples. Field crews did not all collect blank samples the same way nor on each sampling day for several reasons. There was an intermittent problem with inadequate supplies of extra sample bottles and lab pure water. There were also communication problems which continued until the end of the study. Some crews collected two sets of blank samples each sampling day calling one set the Field Blank and the other set the Trip Blank. There were 28 pairs of blank samples (56 samples) collected during this study. There were 23 solitary blank samples collected and one day when three blank samples were collected by one crew. There were a total of 80 blank samples collected during the study for 479 samples for a percentage ratio of 16.7%. This falls short of the goal. Although the number of blank samples was high, they were not collected as planned and the differences between crews did not get resolved during the study.

4.2 Laboratory Work

The chemistry analyses of the samples were performed by contractor laboratories. The first lab appeared to be unable to keep up with the work load. Samples were not analyzed within allowable holding times and there were unacceptable delays in submitting laboratory reports and records. In July 2000, a second contract laboratory took over the chemistry analytical work and continued to the end of the study.

EPA Region III's Office of Analytical Services and Quality Assurance (OASQA) developed the plans for doing the QA/QC review of the laboratory data. The data validation process was consistent with those listed in the "Innovative Approaches for Validation of Organic and Inorganic Data-SOPs", June 1995, Section IM-1, entitled: "Validation of Target Analyte List Metals and Cyanide Data, Manual Approach IM-1." The review process was designed using experience from the QA/QC procedures that EPA uses in overseeing the Contract Laboratory Program (CLP). The plan was modified when the contract was developed for the second laboratory to focus on a thorough review of 10% of the data. All data from sites MT-03, MT-15, MT-24, and MT32 for the following ten analytes were recalculated by EPA chemists: Sulfate,

(NO₂+NO₃)-N, TOC, DOC, Total Iron, Total Aluminum, Total Manganese, Dissolved Iron, Dissolved Aluminum, Dissolved Manganese. They continued to review the reports to confirm that good laboratory practices were being followed with regard to lab methods, detection limits, spiked samples, etc.

Both laboratories evaluated accuracy by preparing and analyzing duplicate spiked samples. The matrix spiked and matrix spiked duplicate (MS/MSD) results were included in the QA/QC review. The parameters which had MS/MSD evaluations were sulfate, chloride, nitrate-nitrite, total phosphorous, total metals, dissolved metals, total organic carbon, and dissolved organic carbon.

4.2.a Data Submission

The data reports from the laboratory were sent to the EPA QA/QC staff. The following additional items were included in each laboratory report: Name and location of laboratory; signature of the Laboratory Director (approval signature); project name; report date; stations; date and time of sampling; laboratory sample ID; listing of all problematic quality control items (for that set of samples) and supporting documentation of the necessary corrective action/s; analytical methods used for each parameter; date of analysis for each analyte; units; analytical results; results for laboratory and field blanks (field blanks are identified by samplers to the lab); sequential page number with total number of pages indicated; fully defined header information with tables of QC results; QC acceptance limits for each QC result; results of preservations checks; MDLs for each analyte and referenced procedure; the QC results summary in each data package is to be limited to that associated with the samples in a months data package; the date and time or position in the analysis sequence of the analysis of QC sample (included in each QC sample result summary for each month); quantitation limits and a reference to method for establishing the QL (e.g. $\ge 3*MDL$); and all calibration, analysis run logs, and sample "raw data" (instrument readings) for the key sites and parameters monitored, to allow the reconstruction of the analytical results, as part of data validation for this project. Additional supporting analytical data was requested if problems were encountered in performing the data validation. The report included the analytical results for the sample set, any QA/QC problems encountered during the analyses; changes in the QAPP; and data quality assessment in terms of precision, accuracy, representativeness, completeness, and comparability.

EPA chemists developed checklists and codes for different QA/QC issues or concerns they might find. They used these checklists in their review of the laboratory reports for compliance with QA/QC requirements. They made notes on the laboratory reports using the codes and guidelines they had developed. Those are described in this report in the section *Data Qualifiers or Flags*. Once the QA/QC review of the reports was completed, the original laboratory records were placed in storage. Copies of the lab reports with the handwritten codes were sent to the Project Officer and report writers.

The laboratories provided an electronic record of the chemistry results for most of the samples. The transfer of these data into the electronic database for this study is described in this report in

the section Database of Results.

4.2.b Data Qualifiers or Flags

EPA Region III Chemists performed the quality review of the analytical data evaluating methods, holding times, preservatives, minimum detection limits (MDL), back calculation of results from lab bench sheets, and compliance with good laboratory practices. Based on this review they assigned "Qualifiers" or "flags" to the data. In general the qualifiers were either Estimates or Rejects.

Estimate codes were assigned in the following categories:

- B No filter blank for DOC or Dissolved Metals, or the blank results exceed 1/10 the sample results.
- C Calibration not performed or documented, or the results vary from the standard concentration by more than 20%.
- D Minimum Detection Limit exceeds QAPP specifications.
- H Holding Times not documented or beyond specification in 40 CFR Part 136.
- M Method not specified or not complying with 40 CFR Part 136.
- P Proper preservative not used or not documented.
- Q Matrix spikes outside of specifications for recovery limits (either lab limits or +/- 25%) or RPD of duplicate spikes beyond precision limits (either lab limits or < 20% RPD). 10 % of samples for selected parameters were to include a matrix spike.
- ? Other (e.g. N.D. = no raw data to support result for critical stations and parameters).

Reject codes were assigned for the following categories:

- R(H) Holding time two days or more beyond the required holding time.
- R(B) Sample value did not exceed the level in the laboratory blank or field blank.
- R(?) Reject for other specified reason.

These flagging codes were hand written on the lab reports during the QA/QC review by the Chemists. EPA staff reviewed the coded lab reports and identified all the data flagged as Rejected. Some additional data was rejected after further evaluation by the report writers after reviewing field and lab notes. These "flags" were entered in the electronic spreadsheet for this study and cross checked for data entry errors. No rejected data has been included in any statistical evaluations of stream quality for this study.

Significant amounts of data from the first lab were rejected in the QA/QC review. Roughly 60 % of the values were rejected for Total Suspended Solids, Total Dissolved Solids, Total Phosphorous, and Total Mercury. Overall about 20% of the entire data set from the first laboratory rejected. The data quality from the second laboratory was much better. The second laboratory had fewer problems with excessive holding times and very little contamination of blanks. The same codes for data qualifiers or flags were used by the EPA Chemists reviewing the data. Again codes were manually written on a lab report form and EPA staff reviewed the coded lab reports and identified all the data flagged as Rejected. They entered these "flags" in the electronic spreadsheet for this study and cross checked this entire data entry effort. No rejected data has been included in any statistical evaluations of stream water quality for

this study.

4.2.c Laboratory Data Completeness Evaluation

Completeness of the entire data set varies with each parameter and with each laboratory. Completeness is calculated according to the following equation:

 $C = ((N - R) - N) \times (100)$

where: C = percent completenessN = total number of values

R = number of values flagged as Rejected

The percent completeness of each parameter is included in Table 5. The percent completeness for the entire dataset is 89.7 %, just missing the goal of 90%. The first laboratory achieved 82.77 % while the second laboratory achieved 97.88 %. The most common cause of rejection was when the first laboratory failed to perform the analyses within the holding times specified in the Method. This was especially true for sulfate, chloride, total suspended solids, total dissolved solids, mercury, nitrate, and nitrite. Even though the second laboratory achieved 100 % completeness for sulfate, chloride, total suspended solids, total dissolved solids, and total phosphorous, the overall percent completeness for those parameters fell short of the goal of 90%. The second laboratory analyzed for (NO₂+NO₃)-N instead of nitrate and nitrite so the percent completeness values for those each of those parameters is from only one laboratory. The data in Table 5 indicate that several other parameters were analyzed at only one laboratory. Several parameters were reported at the second laboratory only due to automated procedures which include groups of parameters, beyond what was tested at the first laboratory.

The changes to levels of organic nutrients in the stream was a concern which initiated the monitoring for total organic carbon (TOC) and dissolved organic carbon (DOC). The values found in this study were consistently near the limits of measurability and there appeared to be something leach from the filter which interfered in the analysis causing the dissolved concentration to be higher than the total concentration. For this reason many of the values for TOC and DOC were rejected, resulting in the very low percent completeness for those two parameters. Several values for total and dissolved metals were also rejected in the QA review when the dissolved value exceeded the total value. This resulted in the lower percent completeness values for aluminum, iron and manganese.

TABLE 5
Percent Completeness for Analytical Results by Laboratory

| ANALYTE | UNITS | LAB 1 - # SAMPLES | LAB 1 - # SAMPLES NOT REJECTED | LAB 1 - % COMPLETE | LAB 2 - # SAMPLES | LAB 2 - # SAMPLES NOT REJECTED | LAB 2 - % COMPLETE |
|---------------------------|-------|----------------------|---|-----------------------|----------------------|---|-----------------------|
| ACIDITY | mg/l | 266 | 208 | 78.20 | 191 | 191 | 100.00 |
| ALKALINITY | mg/l | 266 | 265 | 99.62 | 213 | 213 | 100.00 |
| ALUMINUM, DISSOLVED | ug/l | 266 | 234 | 87.97 | 213 | 213 | 100.00 |
| ALUMINUM, TOTAL | ug/l | 266 | 221 | 83.08 | 213 | 212 | 99.53 |
| ANTIMONY, TOTAL | ug/l | 266 | 251 | 94.36 | 213 | 213 | 100.00 |
| ARSENIC, TOTAL | ug/l | 266 | 264 | 99.25 | 213 | 213 | 100.00 |
| BARIUM, TOTAL | ug/l | | | | 213 | 213 | 100.00 |
| BERYLLIUM, TOTAL | ug/l | 266 | 257 | 96.62 | 213 | 213 | 100.00 |
| CADMIUM, TOTAL | ug/l | 266 | 266 | 100.00 | 213 | 213 | 100.00 |
| CALCIUM, TOTAL | ug/l | 266 | 264 | 99.25 | 213 | 213 | 100.00 |
| CHLORIDE | mg/l | 266 | 161 | 60.53 | 213 | 213 | 100.00 |
| CHROMIUM, TOTAL | ug/l | 266 | 245 | 92.11 | 213 | 213 | 100.00 |
| COBALT TOTAL | ug/l | | | | 213 | 213 | 100.00 |
| COPPER, TOTAL | ug/l | 266 | 255 | 95.86 | 213 | 211 | 99.06 |
| DISSOLVED, ORGANIC CARBON | mg/l | 266 | 208 | 78.20 | 213 | 170 | 79.81 |
| HARDNESS, TOTAL | mg/l | | | | 212 | 212 | 100.00 |
| IRON, DISSOLVED | ug/l | 266 | 222 | 83.46 | 213 | 208 | 97.65 |
| IRON, TOTAL | ug/l | 266 | 208 | 78.20 | 213 | 205 | 96.24 |
| LEAD, TOTAL | ug/l | 266 | 255 | 95.86 | 213 | 213 | 100.00 |
| MAGNESIUM, TOTAL | ug/l | 266 | 266 | 100.00 | 213 | 213 | 100.00 |
| MANGANESE, DISSOLVED | ug/l | 266 | 228 | 85.71 | 213 | 210 | 98.59 |
| MANGANESE, TOTAL | ug/l | 266 | 218 | 81.95 | 213 | 210 | 98.59 |
| MERCURY, TOTAL | mg/l | 266 | 129 | 48.50 | 213 | 174 | 81.69 |
| NICKEL, TOTAL | ug/l | 266 | 239 | 89.85 | 213 | 213 | 100.00 |
| NITRATE+NITRITE (N) | mg/l | | | | 212 | 199 | 93.87 |
| NITRATE | mg/l | 266 | 144 | 54.14 | | | |
| NITRITE | mg/l | 266 | 175 | 65.79 | | | |
| PHOSPHORUS, TOTAL | mg/l | 266 | 106 | 39.85 | 213 | 213 | 100.00 |
| POTASSIUM, TOTAL | mg/l | 266 | 264 | 99.25 | 213 | 213 | 100.00 |
| SELENIUM, TOTAL | ug/l | 266 | 259 | 97.37 | 213 | 210 | 98.59 |
| SILVER, TOTAL | ug/l | 266 | 266 | 100.00 | 213 | 213 | 100.00 |
| SODIUM, TOTAL | mg/l | 266 | 265 | 99.62 | 213 | 213 | 100.00 |
| SULFATE | mg/l | 266 | 171 | 64.29 | 213 | 213 | 100.00 |
| THALLIUM, TOTAL | ug/l | 266 | 250 | 93.98 | 213 | 213 | 100.00 |
| TOTAL DISSOLVED SOLIDS | mg/l | 266 | 116 | 43.61 | 213 | 213 | 100.00 |
| TOTAL ORGANIC CARBON | mg/l | 266 | 206 | 77.44 | 213 | 180 | 84.51 |
| TOTAL SUSPENDED SOLIDS | mg/l | 266 | 115 | 43.23 | 213 | 213 | 100.00 |
| VANADIUM, TOTAL | ug/l | | | | 213 | 213 | 100.00 |
| ZINC, TOTAL | ug/l | 266 | 244 | 91.73 | 213 | 199 | 93.43 |
| TOTALS FOR EACH LAB | | 9310 | 7706 | 82.77 | 7857 | 7690 | 97.88044 |
| OVERALL % COMPLETENESS | | | | | | | 89.70 |

4.3 Corrective Actions

There was a problem early in the study with the field crews not collecting the proper number of Field Duplicate samples. None were collected during the first four rounds of samples. The problem was resolved through increased communication and coordination with the laboratory and field crews. From March through the end of the study, the crews usually collected one duplicate sample every day they were sampling. Field Duplicates made up more than 10% of the samples being collected after March of 2000.

There was also a problem early in the study with the field crews not collecting Blank Samples each day which were to be processed and analyzed just like the stream samples. There was continuing confusion regarding collection and preservation of Blank Samples. Some field crews collected two sets of Blank Samples each day calling one set a Trip Blank and the other set a Field Blank. There was also an intermittent problem with some crews not having adequate supplies of sample containers and lab pure water for the blanks. There was a meeting to improve coordination with the field crews and the laboratory prior to the start of work with the second laboratory, but the Blanks continued to be called different names by different crews.

There were problems with the quality of laboratory data and supporting information during this study forcing a change of laboratories performing the analyses. Timely submission of the laboratory data for QA review by EPA staff was a problem throughout the study. Corrective actions taken included requiring submission of corrections to laboratory reports and submission of additional records. The improvement in percentage completeness between the two laboratories indicates success of the corrective actions.

4.4 Database of the Results

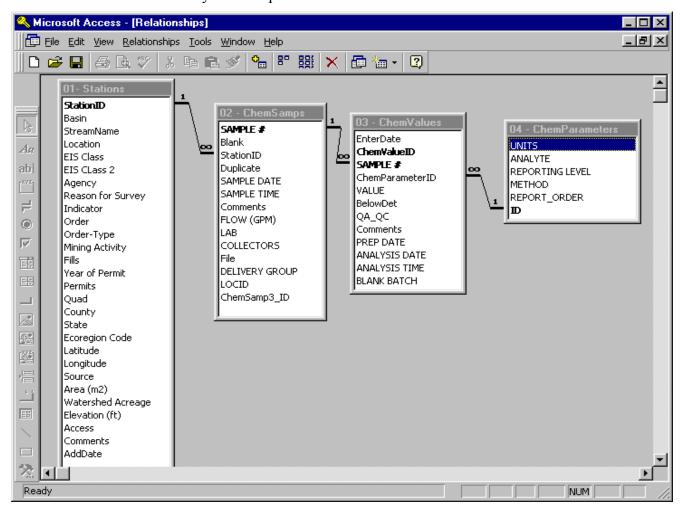
The evaluation of the large amount of data collected during this study has been facilitated by compiling it in an electronic database. Much of the results of analyses from both laboratories were provided to EPA in an electronic format. These data were merged into a single database. This process included standardizing field names, chemical parameter names, and units of measurement. The mountaintop mining chemistry database was established using the Microsoft Access97® relational database. It is included in this report as APPENDIX 3. The database is compatible with most other database software. It can be linked to other applications such as ArcView®, ArcInfo®, or USEPA's STORET. Figure 2 illustrates how the database is organized. The chemistry database contains a collection of four tables that are linked by one or more fields in order to facilitate data analysis. Information regarding each sampling site is listed in the table *01-Stations*. Information about each sample is in the table *02-ChemSamps*. Laboratory results for each sample are stored in the table *03-ChemValues*. Information about the chemical parameters is in the table *04-ChemParameters* This vast amount of information was separated into four tables to reduce repetition within the database.

At least one field in each of the tables is the primary key for the table which functions as a

unique identifier for the information stored in that table. Primary keys are used to link the tables to one another using one-to-many relationships. For example, the field *StationID* is the primary key for table 01 - *Stations* and is used to link to table 02 - *ChemSamps*. *StationID* is not duplicated in table 01 - *Stations*, but it is duplicated in table 02-*ChemSamps* because stations were sampled multiple times in this study.

Figure 2. Organization of Database

Not all the chemical analyses were provided in electronic form from the laboratories. Four



months of lab chemistry data and field chemical parameters for all of the samples were only available in paper form. This data was entered into the database by EPA staff using a set of data entry forms they created to simplify and standardize the data entry process. Staff at the Wheeling office completed an independent check of 100% of the data entry performed at Wheeling and also checked the remainder of the values in the database against the paper copies of laboratory reports and field sheets. Additional checks on the quality of the data and data entry were made

using queries of the database. A request to retrieve or manipulate data from the database is called a query. Queries can filter and summarize data from one or more of the database tables by setting specific criteria and then displaying the results in tabular form. For example, queries can select specific data such as finding all of the samples where a particular value is greater than a specified water quality criteria. They can also perform functions such as calculating hardness from total calcium and total magnesium values. Range checks were performed using queries for each parameter. They provided an extra indication of the accuracy of the data entry since outliers were again verified using the original lab reports. The range checks were useful because they indicated a group of samples where the values for dissolved aluminum, iron and manganese were reported by the laboratory using incorrect units. This problem was then resolved with a letter from the laboratory correcting the errors. An examination of the range of the data also highlighted the importance of considering the values reported for blank samples and highlighted temporal and/or laboratory differences for several chemical parameters.

As a result of QA/QC verification and validation procedures, additional information was added to the original database preserving the original data, but allowing for a record of QA/QC evaluations. The 03-ChemValues table contains a QA_QC field for recording data "flags". A "R" was placed in the QA field for chemistry values that were rejected in the QA/QC data review. Likewise a "B" was added to the QA field when the laboratory results for blanks was greater than or equal to 10% of the sample results. A "RWHL" was entered in the QA_QC field where the report writers identified problems with the data such as when the value for dissolved organic carbon was greater than the value for total organic carbon or when a note from the chemist indicated acid appeared to have been added to the wrong sample container. Some other values were rejected based on the field sheet notes of problems encountered at the time of sampling. For example, the field sheet for one sample noted they only acidified bottles 2 & 6. These field sampling problems were flagged "RWHL" and the appropriate values were rejected from the data evaluation.

5. EVALUATION AND DISCUSSION OF RESULTS

Several methods of evaluating the data were undertaken in seeking to characterize and compare conditions in streams below mountaintop removal / valley fill mining operations. This evaluation was made more complicated by several factors including variations in the quality of the data. The precision of sampling results varied with each parameter as well as with laboratory over the duration of the study. The results of the duplicate samples and blank samples are used to assess the precision of sample results and better evaluate the true impact. This evaluation was facilitated by storing the data in an electronic database which is described first in this evaluation and discussion.

The initial evaluation seeks to identify **parameters likely to be impacted by MTM/VF mining.** The average water quality at all Filled sites is compared to the water quality at all Unmined sites sampled during this study. The parameters most altered are then examined for all categories of sites for the entire data set to evaluate mining impacts on each parameter. Variations in data quality are evaluated using the duplicate sample results. Additional insight is provided through calculation of a value called "Yield," an idea taken from a USGS publication (Sams & Beer 2000, page 10). Yield rates are calculated by dividing loading values by the drainage area.

The second approach in this evaluation is to identify the samples and sites which **exceeded West Virginia's stream water quality criteria**. Sites which have multiple violations are described and characterized.

Finally, the eight parameters which had **little or no detectable concentrations** in any samples are listed and briefly discussed.

5.1 Parameters Likely To Be Impacted By MTM/VF Mining

5.1.a Filled Sites vs Unmined Sites

The median concentration from all Filled sites was compared to the median concentration from all Unmined sites to identify which parameters were most likely to be impacted by MTM/VF mining. The ratio of Mined to Unmined was used to prioritize the discussion and evaluation of the data from all categories of sites. Only data from the second laboratory was used in this comparison since there were data quality differences between the two laboratories. Table 6 lists the median values for all Filled site data and all Unmined site data as well as the ratios for each parameter. There are 16 parameters with a ratio greater than 1.0 and each will be discussed individually beginning with sulfate. The 25 remaining parameters will also be discussed but they may be discussed in groups of parameters or in later sections of this report.

Table 6. Median Values at All Filled vs All Unmined Sites - Lab 2 Only

| Parameter | Median Unmined* | Median Filled* | Ratio Filled/Unmined | Det. Limit @ Lab 2* |
|-----------------------------------|-----------------|----------------|----------------------|---------------------|
| Sulfate | 12.55 | 523.5 | 41.7 | 5 |
| Calcium | 4.875 | 104 | 21.3 | 0.1 |
| Magnesium | 4.095 | 86.7 | 21.2 | 0.5 |
| Hardness | 29.05 | 617 | 21.2 | 3.31 |
| Solids, Dissolved | 50.5 | 847 | 16.8 | 5 |
| Manganese, Total | 0.005 | 0.04395 | 8.8 | 0.01 |
| Conductivity, Field (uS/cm) | 66.4 | 585 | 8.8 | N/A |
| Selenium | 0.0015 | 0.01168 | 7.8 | 0.003 |
| Alkalinity | 20 | 149.5 | 7.5 | 5 |
| Potassium | 1.58 | 8.07 | 5.1 | 0.75 |
| Sodium | 1.43 | 4.46 | 3.1 | 0.5 |
| Manganese, Dissolved | 0.005 | 0.01035 | 2.1 | 0.01 |
| Chloride | 2.5 | 4.5 | 1.8 | 5 |
| Acidity | 2.5 | 4.25 | 1.7 | 2 |
| Nitrate/Nitrite (N) | 0.81 | 0.95 | 1.2 | 0.1 |
| pH, Field (std) | 6.78 | 7.77 | 1.1 | N/A |
| Acidity, Hot | 2.5 | 2.5 | 1.0 | 5 |
| Aluminum, Dissolved | 0.050 | 0.050 | 1.0 | 0.1 |
| Antimony | 0.0025 | 0.0025 | 1.0 | 0.005 |
| Arsenic | 0.001 | 0.001 | 1.0 | 0.002 |
| Beryllium | 0.0005 | 0.0005 | 1.0 | 0.001 |
| Cadmium | 0.0005 | 0.0005 | 1.0 | 0.001 |
| Chromium | 0.0025 | 0.0025 | 1.0 | 0.005 |
| Cobalt | 0.0025 | 0.0025 | 1.0 | 0.005 |
| Copper | 0.0025 | 0.0025 | 1.0 | 0.005 |
| Lead | 0.001 | 0.001 | 1.0 | 0.002 |
| Mercury | 0.0001 | 0.0001 | 1.0 | 0.0002 |
| Nickel | 0.010 | 0.010 | 1.0 | 0.02 |
| Organic Carbon, Total | 1.35 | 1.4 | 1.0 | 1 |
| Phosphorous | 0.05 | 0.05 | 1.0 | 0.1 |
| Silver | 0.005 | 0.005 | 1.0 | 0.01 |
| Thallium | 0.001 | 0.001 | 1.0 | 0.002 |
| Vanadium | 0.005 | 0.005 | 1.0 | 0.01 |
| Barium | 0.02885 | 0.02465 | 0.9 | 0.02 |
| Dissolved Oxygen, Field | 13.6 | 11.045 | 0.8 | N/A |
| Organic Carbon, Dissolved | 2.45 | 1.95 | 0.8 | 1 |
| Solids, Suspended | 5.75 | 4.25 | 0.7 | 5 |
| Iron, Total | 0.417 | 0.1935 | 0.5 | 0.1 |
| Iron, Dissolved | 0.220 | 0.096 | 0.4 | 0.1 |
| Zinc | 0.006 | 0.0025 | 0.4 | 0.005 |
| * Concentrations are in mg/L unle | 0.147 | 0.050 | 0.3 | 0.1 |

^{*} Concentrations are in mg/L unless noted.

5.2 Sulfate Data

Although there is no stream criterion for sulfate in West Virginia to protect aquatic life, several groups have looked at the impacts of sulfate on other water uses. The adverse effects of high concentrations of aluminum in water supplies were noted in EPA's "Blue Book 1972." Their recommendation was:

On the basis of taste and laxative effects and because the defined treatment process does not remove sulfates, it is recommended that sulfate in public water sources not exceed 250 mg/l where sources with lower sulfate concentrations are or can be made available. (Rolich et al 1972, page 89)

This recommendation was set to protect human health at water supplies using surface waters as a source. Additional research should be conducted to investigate the effects of sulfates on aquatic life. Regarding the impact on aquatic life, the California State Water Resources Control Board publication *Water Quality Criteria* 1963 edition states:

In U.S. waters that support good game fish, 5 percent of the waters contain less than 11 mg/l of sulfates, 50 percent less than 32 mg/l, and 95 percent less than 90 mg/l. Experience indicates that water containing less than 0.5 mg/l sulfate will not support growth of algae. (McKee et al 1963, page 276)

MTM/VF permit writers in West Virginia recognize sulfates as a significant indicator of mining activity. Their Cumulative Hydrologic Impact Assessment (CHIA) report for the Twentymile Creek watershed states:

The data indicate that the sulfate concentrations are increased with mining. Sulfates are endemic to mining areas and are indicators of mining in a watershed. A rule of thumb can be observed from the water quality data researched for this CHIA. This rule is (A) below 20 mg/l there is no mining in the watershed (B) between 20 and 30 mg/l there has been very little or no impact from mining in a watershed (C) from 30 to 100 mg/l there has been some impact from mining (D) above 100 mg/l there has been certain impact from mining. (West Virginia Department of Environmental Protection, CHIA for Twentymile Creek, pages not numbered)

5.2.a Sulfate Concentration in Stream Samples

The concentration of sulfate at each site varied with time during this study. The values for each sample from all sites have been plotted against time in Figure SO₄-1. Each category of site has been plotted with a different symbol so the variation of concentrations classes of sites can be evaluated. The detection limit was 10 mg/L at the first laboratory and 5 mg/L at the second laboratory.

The sulfate concentrations at the Unmined sites fit the rule of thumb for unmined watersheds set by the CHIA report writers and were well below the recommended drinking water criterion of 250 mg/l. The median concentration for all Unmined sites was only 14.25 mg/L. The US Geological Survey report Water Quality in the Allegheny and Monongahela River Basins, Circular 1202", published in 2000 indicates the regional background concentration of sulfate in unmined watersheds in the northern portion of the Appalachian coal field averages about 21 mg/l (Anderson et al 2000, page 20), which is similar to the concentrations at Unmined sites in this study.

Many samples from the categories Filled and Mined had sulfate values exceeding the recommended drinking water standard of 250 mg/L. Especially noteworthy are the values for the samples from site MT-24, a yellow diamond symbol in Figure SO₄-1. The concentrations ranged from 800 to 2,300 mg/L and are consistently higher than the concentration at all other types of sites. This site is not a stream but a flow diversion ditch at an MTM/VF mine. Obviously the site is a source of sulfate to the stream below. The sites in the category Filled comprise the majority of the higher concentrations.

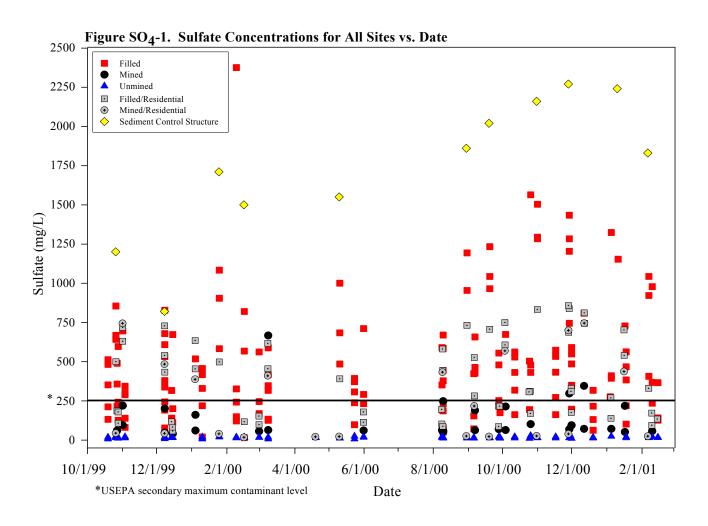


Table SO₄-1 lists a summary of the 172 samples which exceed the Secondary Maximum Contaminant Level of 250 mg/L for Sulfate. Roughly 45 % of the samples which passed the QA/QC review exceeded the sulfate criterion but none came from sites in the category Unmined. There are 110 samples from the category Filled, and another 37 samples from the category Filled/Residences. There are 4 samples at Mined sites and another 10 from the category Mined/Residences. There were 11 samples from the diversion ditch exceeding the criterion. The sites where the sulfate concentration was high were scattered across the study area in areas where coal mining has occurred.

Table SO₄-1. Number of Samples Exceeding the Secondary Maximum Contaminant Level of 250 mg/L for Sulfate

| Station ID | EIS Class | No. Samples > 250 mg/L |
|------------|------------------------|------------------------|
| MT-14 | Filled | 10 of 11 |
| MT-15 | Filled | 10 of 10 |
| MT-18 | Filled | 11 of 11 |
| MT-25B | Filled | 7 of 10 |
| MT-32 | Filled | 4 of 10 |
| MT/34B | Filled | 10 of 10 |
| MT-52 | Filled | 3 of 8 |
| MT-57B | Filled | 6 of 7 |
| MT-64 | Filled | 11 of 11 |
| MT-87 | Filled | 3 of 13 |
| MT-98 | Filled | 13 of 13 |
| MT-103 | Filled | 12 of 13 |
| MT-104 | Filled | 10 of 13 |
| MT-23 | Filled/Residences | 10 of 11 |
| MT-48 | Filled/residences | 3 of 10 |
| MT-55 | Filled/Residences | 2 of 8 |
| MT-62 | Filled/Residences | 11 of 11 |
| MT-75 | Filled/Residences | 11 of 11 |
| MT-79 | Mined | 4 of 11 |
| MT-69 | Mined/Residences | 10 of 11 |
| MT-24 | MTM/VF Diversion Ditch | 11 of 11 |

5.2.b QA Samples for Sulfate

Evaluation of the results of duplicate samples indicate the values for sulfate are generally precise. The QA/QC review of the data checked for accuracy. The sulfate data remaining are suitable for evaluating the impacts to stream chemistry resulting from MTM/VF mining. The Relative Percent Difference (RPD) values for the 44 sets of field duplicate samples are listed in Table SO₄-2.

Table SO₄-2. RPD for Field Duplicates for Sulfate

| Station ID | Sample Date | Laboratory | RPD |
|------------|--------------|------------|-----|
| MT104 | 3/8/00 LAB 1 | | 194 |
| MT62 | 3/8/00 | LAB 1 | 3 |
| MT86 | 3/8/00 | LAB 1 | 1 |
| MT02 | 4/19/00 | LAB 1 | 1 |
| MT02 | 5/10/00 | LAB 1 | 1 |
| MT75 | 6/13/00 | LAB 1 | 3 |
| MT25B | 8/8/00 | LAB 2 | 2 |
| MT104 | 8/9/00 | LAB 2 | 1 |
| MT52 | 8/9/00 | LAB 2 | 5 |
| MT62 | 8/9/00 | LAB 2 | 1 |
| MT24 | 8/30/00 | LAB 2 | 4 |
| MT98 | 9/5/00 | LAB 2 | 1 |
| MT75 | 9/6/00 | LAB 2 | 1 |
| MT24 | 9/19/00 | LAB 2 | 1 |
| MT48 | 9/27/00 | LAB 2 | 11 |
| MT51 | 9/28/00 | LAB 2 | 0 |
| MT79 | 10/3/00 | LAB 2 | 1 |
| MT95 | 10/11/00 | LAB 2 | 1 |
| MT57B | 10/24/00 | LAB 2 | 3 |
| MT25B | 10/25/00 | LAB 2 | 1 |
| MT15 | 10/31/00 | LAB 2 | 1 |
| MT87 | 11/16/00 | LAB 2 | 1 |
| MT24 | 11/28/00 | LAB 2 | 4 |
| MT81 | 11/28/00 | LAB 2 | 1 |
| MT40 | 11/30/00 | LAB 2 | 2 |
| MT50 | 11/30/00 | LAB 2 | 2 |
| MT79 | 12/11/00 | LAB 2 | 4 |
| MT91 | 12/19/00 | LAB 2 | 0 |
| MT55 | 1/3/01 | LAB 2 | 2 |
| MT34B | 1/4/01 | LAB 2 | 5 |
| MT01 | 1/10/01 | LAB 2 | 1 |
| MT64 | 1/16/01 | LAB 2 | 3 |
| MT86 | 1/17/01 | LAB 2 | 0 |
| MT02 | 2/6/01 | LAB 2 | 1 |
| MT32 | 2/9/01 | LAB 2 | 1 |
| MT55 | 2/14/01 | LAB 2 | 2 |

The highest RPD for the duplicates was 11 and many values were 1. This indicates the data for sulfate was generally precise throughout the study. The results of duplicate samples are also presented in Figure SO_4 -2, Comparison of Duplicate Samples - Sulfate Concentration. In this graph, duplicate sets of sample results are plotted with one value being plotted on the x-axis and the other plotted on the y-axis. If a set of duplicate samples had exactly the same concentration value, the point would fall on a line from zero/zero to 3000/3000. A general limit on precision of plus or minus 25% was used in this study. This precision limit is also shown on the Figure to illustrate if a set of duplicate samples are out of normal precision limits or "out of control." In addition, the values from the two laboratories are plotted with different symbols to determine if there is a difference in precision between the data from the two parts of the study. There were nine sets of duplicate samples rejected in the QA/QC review of laboratory results, and all were during the early part of the study at laboratory 1. No duplicates were rejected in data from the second laboratory.

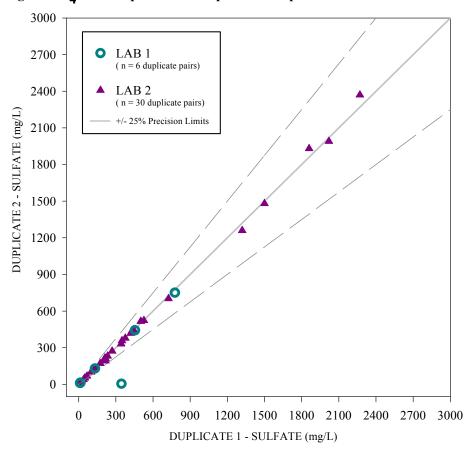


Figure SO₄-2. Comparison of Duplicate Samples - Sulfate Concentrations

The agreement in results for each set of duplicates is evident. Duplicate samples run at the second laboratory had a wider range of concentrations but were still quite precise.

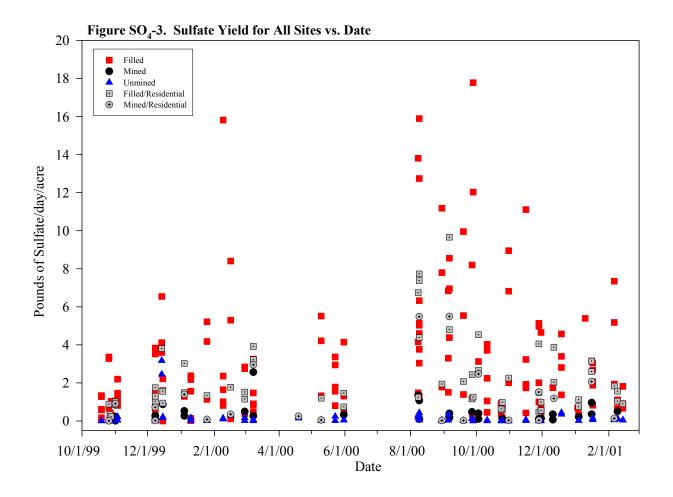
The concentration of sulfates in the 80 blank samples should have been below the detection limit. There was only one sample with a detectable concentration of sulfate and it was at the first laboratory. Of the 80 blank samples, there were 28 pairs of duplicate blank samples and all were below the detection limit in the laboratory indicating no detectable contamination occurred from sample handling in the field or the laboratory. The quality of the data for sulfate is good.

5.2.c Sulfate Yield

Sulfate has long been considered a good indicator of the presence of coal mine drainage in streams in Appalachia. The relationship between coal mining and sulfate in streams is the focus of the US Geological Survey Water-Resources Investigations Report 99-4208 (Sams & Beer, 2000). The report notes that sulfate is an excellent indicator of mine drainage because the sulfate ion is very soluble and chemically stable at the pH levels normally encountered in streams, and the treatment of mine drainage to remove metals and neutralize acidity has little or no effect on sulfate concentration. The authors calculated the annual discharge of sulfate at selected stream monitoring points and divided that loading by the drainage area above the monitoring point to determine "Sulfate Yield" in tons per year per square mile. They used these Sulfate Yield rates to rank stream degradation attributable to mining. A similar approach has been used in this report to evaluate the impacts of mining on the streams.

Sulfate Yield was calculated for each sampling event at each site. The first step was to calculate the instantaneous sulfate load for each sample event by multiplying the sulfate concentration (mg/L) times the instantaneous flow rate (cubic feet per second) times the conversion factor (5.39) to get a load in pounds per day. The Sulfate Yield was then determined by dividing the instantaneous sulfate load by the drainage area above that site. The Sulfate Yield in this report is measured in pounds of sulfate per day per acre. These Sulfate Yield values vary at each site with each sampling event. They also vary with the categories of sites being evaluated in this study - Unmined, Mined, Filled, Filled with Residences, and Mined with Residences. No Sulfate Yield values were calculated for site MT- 24 since there is no accurate data on the area now draining to the site. Mountaintop mining has changed the original drainage patterns and there is no accurate map of the new watershed boundary. The variations in Sulfate Yield can be plotted against time to compare categories of sites. Figure SO₄-3 is a graph of Sulfate Yield rates for all sites vs date.

The production of sulfate per acre at sites in the "Filled" category is much higher than at "Unmined" sites. The highest yields are consistently from "Filled" sites and range from 0 to over 14 pounds per acre per day. Sulfate Yield rates at Unmined sites are consistently less than one pound per acre per day. There are two samples collected in December 1999 at Unmined sites with yield rates greater than 2 pounds per day per acre. Those samples are from sites MT-50 and MT-51. The field sheet includes the note "Heavy precipitation in the last 24 hours," which would explain the higher yield rate values for these Unmined sites.



The Sulfate Yield rates described in the US Geological Survey Water-Resources Investigations Report 99-4208 (Sams & Beer, 2000) were measured in tons per year per square mile. The Yield rate for two unmined watersheds in this USGS study was calculated to be 24 tons in one watershed and 25 tons per year per square mile in another. (Sams et al 2000, page 9) This is equivalent to about 0.2 pounds per day per acre. Mined watersheds produced up to 580 tons per year per square mile (about 5 pounds per day per acre). These sulfate yield rates are for drainage areas that are many miles away from the region of mountaintop mining and have different geology. The Allegheny and Monongahela River watersheds are dominated by high sulfur coals while low sulfur coals dominate the geology of the region of mountaintop mining. Even so, the values for Sulfate Yield in the northern high sulfur region are similar to those in the study area. Unmined watersheds produce less than a pound of sulfate per day per acre and heavily mined watersheds can produce 5 pounds per day per acre or more. Sulfate is an excellent indicator of coal mining activity throughout the northern Appalachian coal field. MTM/VF mining operations increase the concentration of sulfate in streams draining the mining sites.

5.3 Calcium Data

Calcium is a significant part of hardness, but like magnesium, it does not have water quality limits. According to the California State Water Resources Control Board's *Water Quality Criteria*, calcium salts and calcium ions are among the most commonly encountered substances in water. They result from the leaching of soil and other natural sources. Calcium is an essential element for plants and animals. Concerning the impacts to fish and other aquatic life, the report notes:

Calcium in water reduces the toxicity of many chemical compounds to fish and other aquatic fauna. According to a reference cited by Hart et al., of the U.S. water supporting a good mix of fish fauna, ordinarily about 5 percent have less than 15 mg/l of calcium; 50 percent have less than 28 mg/l; and 95 percent have less than 52 mg/l.

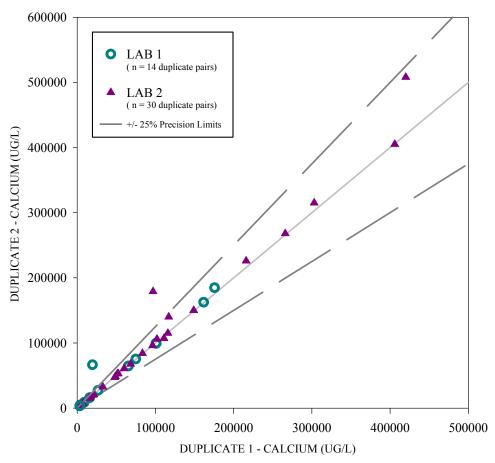


Figure Ca-1. Comparison of Duplicate Samples - Calcium

The results of duplicate samples for calcium are shown in Figure Ca-1. The detection limit was 100 ug/L. The precision was good for both laboratories, and again there were higher values from the second laboratory. There were 13 blank samples of the 80 collected which had detectable concentrations of calcium. All were collected in the first half of this study and analyzed at the first laboratory. Further discussion of the calcium concentrations from this study will focus on the significant contribution of calcium to hardness.

5.4 Magnesium Data

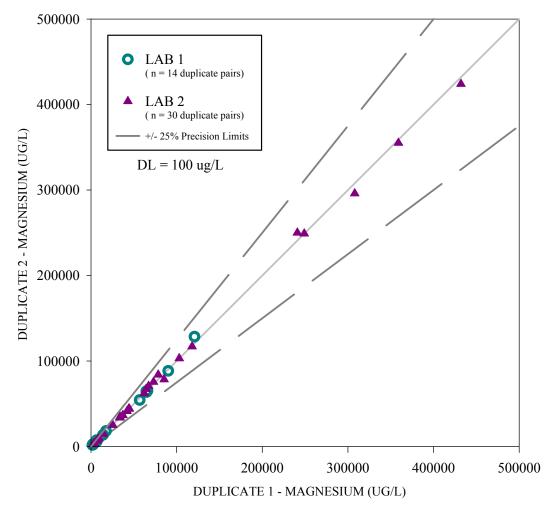
According to the California State Water Resources Control Board's *Water Quality Criteria*, magnesium constitutes about 2.1 % of the crust of the earth being widely distributed in ores and minerals. The salts of magnesium are very soluble. Magnesium is an essential element for plants and animals. Magnesium is considered relatively non-toxic to humans and not a health hazard because, before toxic concentrations are reached in water, the taste becomes quite unpleasant. Concerning the impacts to fish and other aquatic life, the report notes:

Hart et al. cite a report that among U.S. waters supporting a good fish fauna, ordinarily 5 percent have less than 3.5 mg/L of magnesium; 50 percent have less than 7 mg/L; and 95 percent have less than 14 mg/L.

The results of duplicate samples are plotted in Figure Mg-1. The detection limit was 100 ug/L. None of the laboratory values for magnesium in this study were rejected in the data quality

Figure Mg-1. Comparison of Duplicate Samples - Magnesium





The results of duplicate samples are very precise across a wide range of concentrations. The values at the second laboratory were higher than those at the first. Ten percent of the eighty blank samples had detectable concentrations of magnesium. All of these contaminated blank samples were collected in the first half of the study. The detection limit for magnesium is 100 ug/L which is 3% of the median value detected at Unmined sites so the increase is well above the minimum detectable values. Further discussion of the magnesium concentrations from this study will focus on the significant contribution of magnesium to hardness.

5.5 Total Hardness Data

According to the California State Water Resources Control Board's *Water Quality Criteria*, the term "Hardness" refers to the soap-neutralizing power of water. Any substance that will form an insoluble curd with soap causes hardness. Hardness is attributable principally to calcium and magnesium ions but other metals can increase hardness. Indeed the standard method (Method 2340 B) for calculating hardness is determined using only the concentrations of calcium and magnesium. The equation is:

Hardness in mg/L = 2.497 (Calcium in mg/L) + 4.118 (Magnesium in mg/L)

The hardness values were calculated for each sample and used in this evaluation of hardness concentration. Acceptable levels of hardness in drinking waters vary with consumer preference and "good drinking water" can have a maximum hardness from 140 mg/l to 270 mg/l. Regarding the impact of hardness on aquatic life, this reference states, "Soft water solutions increase the sensitivity of fish to toxic metals; in hard waters toxic metals may be less dangerous."

Several stream water quality criteria for toxic metals have been established with a limit that varies with the hardness in the stream. The harder the water the more of the toxic metal can be present without causing toxicity. West Virginia has set water quality limits on toxic metals to protect aquatic life in streams in this study area. These limits are calculated from equations which use the hardness concentration to calculate the maximum allowable concentration of the metal. Limits have been set for the following dissolved metals: cadmium, copper, lead, nickel, silver, and zinc. Hardness is an acceptable contaminant for most water uses in low concentrations.

5.5.a Hardness Concentration in Stream Samples

The concentration of hardness at each site varied with time during this study. The values for each sample from all sites have been calculated and plotted against time in Figure H-1. Each category of site has been plotted with a different symbol so the variations between categories can be evaluated. Unmined sites consistently have the lowest concentration of hardness while the Sediment Control Structure (MT-24) has the highest concentrations. All types of sites which have mining activity upstream also have elevated concentrations of hardness, with the Filled category sites generally being higher.

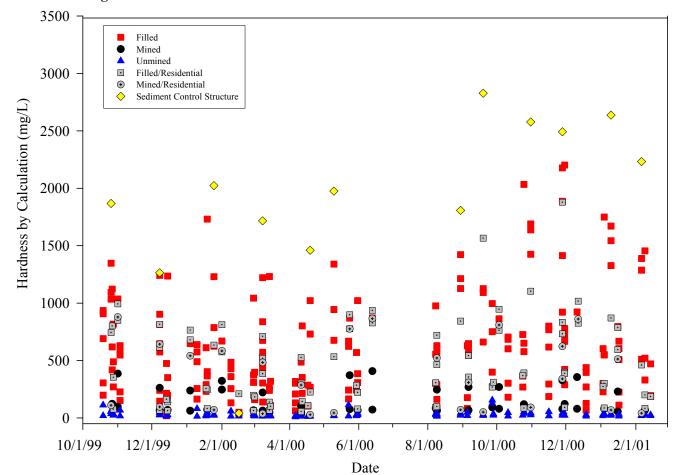


Figure H-1. Hardness Concentration for All Sites vs. Date

5.5.b QA Samples for Hardness

Hardness values were calculated from the concentration of calcium and magnesium. The QA samples for those parameters have been presented so there is no need for additional discussion.

5.5.c Hardness Yield

The Yield of hardness in pounds per day per acre for each sample is presented in Figure H-2. The Yield for Unmined sites is generally less than one pound per day per acre while the Yield for Filled sites is generally above two pounds per day per acre with some values nearly 25 pounds per day per acre. Higher Yields are also evident at Filled/Residential and Mined/Residential sites. There appear to be higher Yield values in the second half of the study. There are also two samples collected in December 1999 at two Unmined sites with yield rates above 2 pounds per day per acre. A note on the field sheet states "Heavy rainfall for the previous 24 hours," which would account for these higher yield rates. The data from both laboratories indicate Filled sites have elevated values for Hardness Yield.

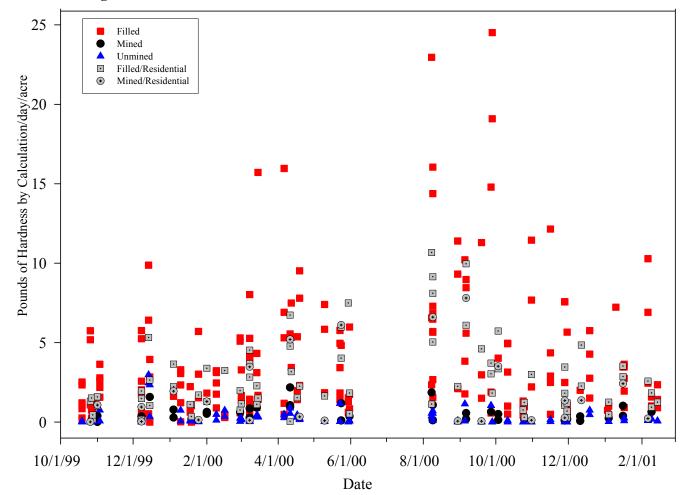


Figure H-2. Hardness Yield for All Sites vs. Date

5.6 Total Dissolved Solids Data

In natural waters the dissolved solids are various minerals in their ionic form including carbonates, bicarbonates, chlorides, sulfates, phosphates, and nitrates of various metals. Since dissolved solids are often a diverse mix of various salts, the effect on use of the water can be equally diverse. For drinking water, the U.S. Public Health Service in 1962 recommended that the total dissolved solids should not exceed 500 mg/l if more suitable supplies are or can be made available. Regarding protection of fish and aquatic life, the California State Water Resources Control Board's *Water Quality Criteria* states:

It has been reported that among inland waters in the United States supporting a good mixed fish fauna, about 5 percent have a dissolved solids concentration under 72 mg/L; about 50 percent under 169 mg/L; and about 95 percent under 400 mg/L.

5.6.a Dissolved Solids Concentration in Stream Samples

Figure DS-1 presents all the data that passed the QA review for concentration of dissolved solids for all sites. The detection limit was 5 mg/L. A separate symbol represents each category of site to allow trends to be more easily observed.

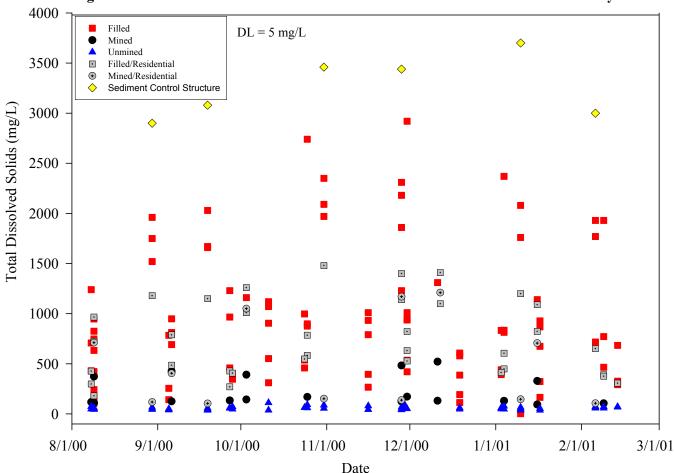


Figure DS-1. Total Dissolved Solids Concentration for All Sites vs. Date - Lab 2 Only

The QA review of data rejected 57 % of the values for dissolved solids at the first laboratory while 100 % of the values at the second laboratory passed the review. The values for all dissolved solids samples from the first laboratory were near zero while the values at the second laboratory range up to over 3,700 mg/L. There should have been high concentrations of dissolved solids during the first half of the study since sulfate and hardness were high. The data from the first lab was therefore not used in this evaluation.

5.6.b QA Samples for Dissolved Solids

A major reason for rejection of data at the first laboratory was excessive holding time before analysis. As for the blank samples, 27 of the 30 blanks at the first laboratory had detectable levels of dissolved solids. Only one of the 50 blanks tested at the second laboratory had measurable levels of dissolved solids. All 30 duplicate samples run at the second laboratory passed the QA/QC review. The results of duplicate samples are shown in Figure DS-2.

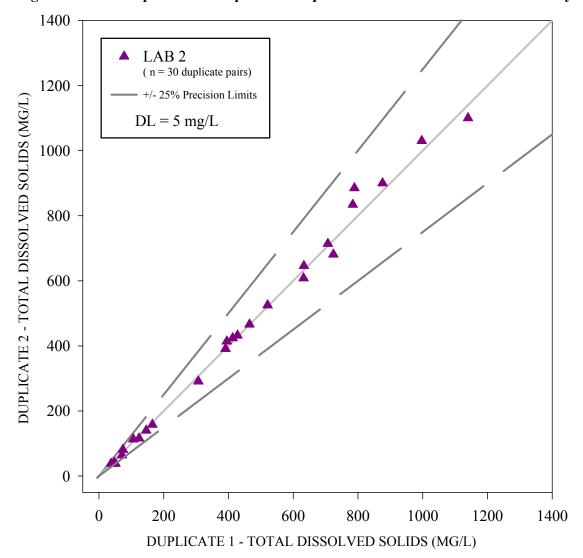


Figure DS-2. Comparison of Duplicate Samples-Total Dissolved Solids-Lab 2 Only

The duplicate samples results at the second laboratory are quite precise over a broad range of concentrations. The detection limit for dissolved solids was 5 mg/L which means the median value of 46 mg/L at Unmined sites is well above the limits of measurability. The dissolved solids values from the second laboratory have acceptable precision and can be used to evaluate the impacts of MTM/VF on stream water quality.

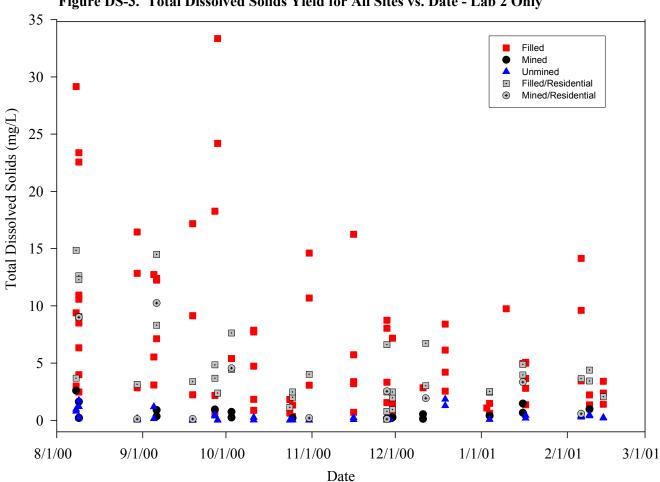


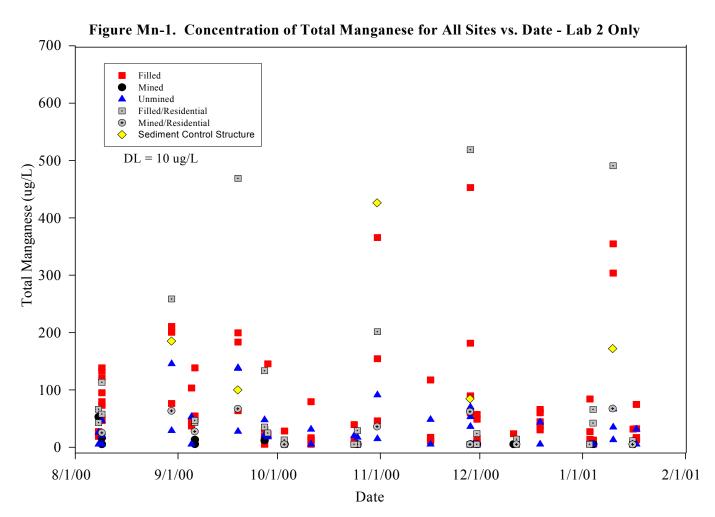
Figure DS-3. Total Dissolved Solids Yield for All Sites vs. Date - Lab 2 Only

Figure DS-3 plots the Yield of dissolved solids for all sites. Yield rates for the second half of the study indicate Filled sites have elevated values of dissolved solids, up to 30 pounds per day per acre. Yield rates at Unmined sites are less than 2 pounds per day per acre.

5.7 Manganese, Total and Dissolved Data

There are discharge limits on total manganese for active mines set forth in the Code of Federal Regulations, Title 40, Part 434. The limits are 4.0 mg/L (4000 ug/L) maximum for any one day and 2.0 mg/L (2000 ug/L) maximum for thirty consecutive days. Although none of the monitoring points in this study is a discharge monitoring point for a permit, the limits serve as a reference when evaluating the concentrations in the streams. Manganese laden overburden is a concern for MTM/VF operations requiring special handling during the mining. The goal is to minimize leaching of manganese from the site in quantities that exceed the permit limit. There are reclaimed MTM/VF mines that continue to require chemical treatment of the discharges in order to comply with permit effluent limits (WVDEP CHIA for Twentymile Creek).

Data from the first lab lacked precision and was not included in this evaluation. Total manganese was detected in 70 % of the 210 samples analyzed at the second laboratory. The detection limit was 10 ug/L. It was found in all categories of sites and in all five watersheds studied. The maximum concentration of total manganese identified was 518 ug/L (site MT-23, category Filled/Residences, date - 11/28/00). This is about 12 % of the daily maximum effluent limit for coal mines. The maximum value detected at any Unmined site was 145 ug/L (MT-13, date - 08/30/00). Manganese concentration data is presented in Figure Mn-1. The higher values are generally at sites in the category "Filled", but the values are not consistent for specific sites.



An example is range of concentrations for the Sediment Control Structure (MT-24) which go from less than 100 ug/L to more than 400 ug/L. The highest values were at site MT-23, which is the Mud River near the town of Mud. The manganese values at sites throughout the Mud River watershed are the higher values in this figure. Site MT-13, the mouth of Spring Branch in the Mud River watershed, is an Unmined site which had manganese values of 145 ug/L on 8/30/00 and 137 ug/L on 9/19/00. These higher values were associated with low flows (13 gpm and 0.5 gpm respectively) as the concentration at this site dropped below the detection limit when the flow rose to 150 gpm in February.

Figure Mn-2 plots the concentration of duplicate samples. The precision is only fair at the second lab. The values range up to about 25 times the detection limit.

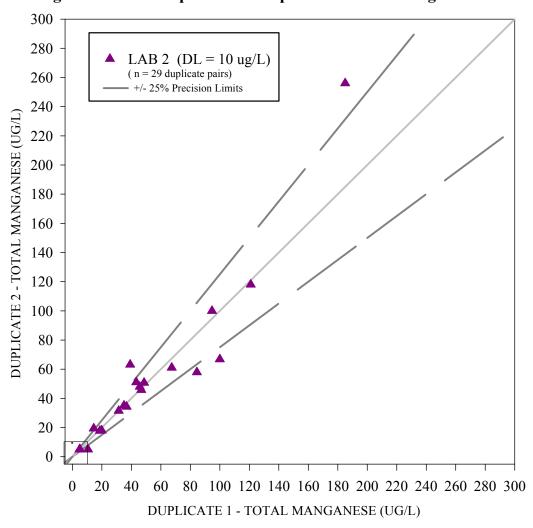


Figure Mn-2. Comparison of Duplicates - Total Manganese - Lab 2 Only

Dissolved manganese was also measured in this study. Results of duplicate samples for dissolved manganese are plotted in Figure Mn-3. Precision is better than that for total manganese, but the range of concentration is smaller, being only about 8 times the detection limit.

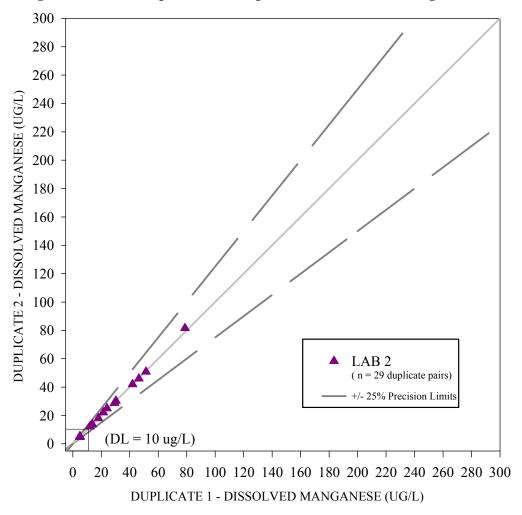
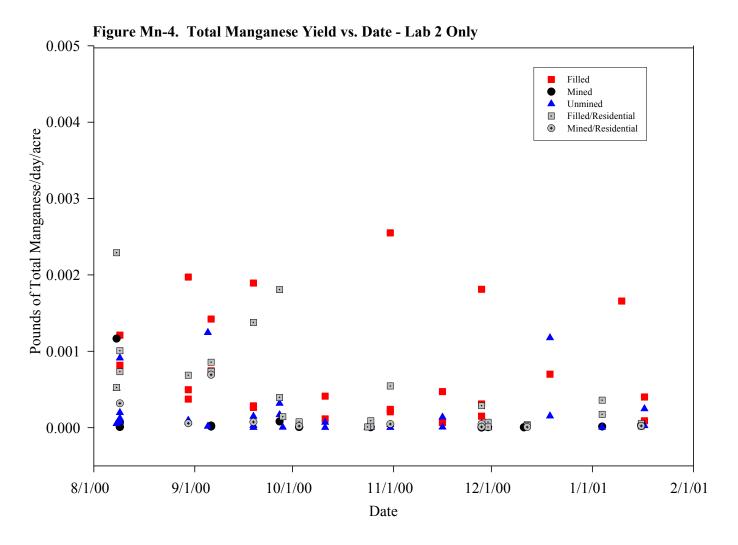


Figure Mn-3. Comparison of Duplicates - Dissolved Manganese - Lab 2 Only

The data for manganese indicate it occurs across the study area. MTM/VF mining can increase the concentration of manganese in streams and require long term chemical treatment of discharges. Careful analysis and special handling of mine overburden is required to minimize the concentration of manganese in permitted wastewater discharges from MTM/VF mines.

Yield rates for manganese are presented in Figure Mn-4 for the second laboratory only. Yield rates are all less than 0.003 pounds per acre per day and the higher values are from most categories of sites. This indicates that higher manganese values in streams are not closely related to mining activities and that mines are complying with permit limits on manganese.



5.8 Specific Conductance Data

Specific conductance or conductivity is a quick method of measuring the ion concentration of water. The 18th Edition of *Standard Methods for the Examination of Water and Wastewater* states:

Conductivity is the measure of the ability of an aqueous solution to carry an electric current. This ability depends on the presence of ions: on their total concentration, mobility, and valence: and on the temperature of measurement. Solutions of most inorganic compounds are relatively good conductors. Conversely, molecules of organic compounds that do not dissociate in aqueous solution conduct a current very poorly, if at all.

The unit of measure is micromhos per centimeter or in the International System of Units, millisiemens per meter. Specific conductance is measured in the field using a calibrated meter. The median conductance value of samples from site MT-24 was 2,856 while the median conductance of all samples at Unmined sites was 62.6 micromho/cm, indicating higher

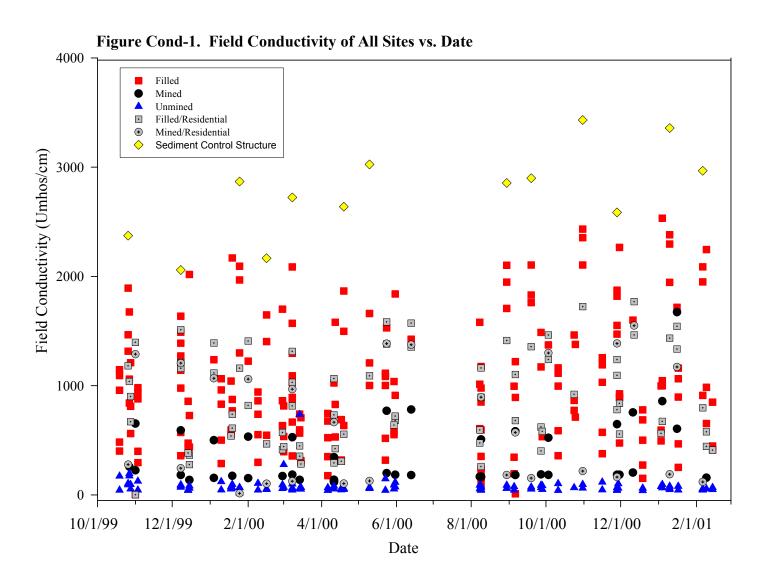
concentrations of ions came from the area upstream of MT-24 site.

Although there is no stream criterion for conductivity in West Virginia, it is commonly measured as part of streams surveys. Regarding the impact of conductivity on fish and aquatic life, the California State Water Resources Control Board's *Water Quality Criteria* states:

.... Hart et al. have reported that among United States waters supporting a good fish fauna about 5 % have a specific conductivity under $50x10^{-6}$ mhos [50 micromhos/cm] at $25^{\circ}C$; about 50 percent under $270x \ 10^{-6}$ mhos [270 micromhos/cm]; and about 95 percent under $1100x10^{-6}$ mhos [1100 micromhos/cm].

The conductivity of the streams during the sampling event has been included in Figure Cond-1. A different symbol has been used for each category of site so evaluation of trends is more evident. Conductivity at Filled sites can be 100 times greater than that at Unmined sites. The highest values are consistently at the Sediment Control Structure (MT-24) which is on a reclaimed MTM/VF mine.

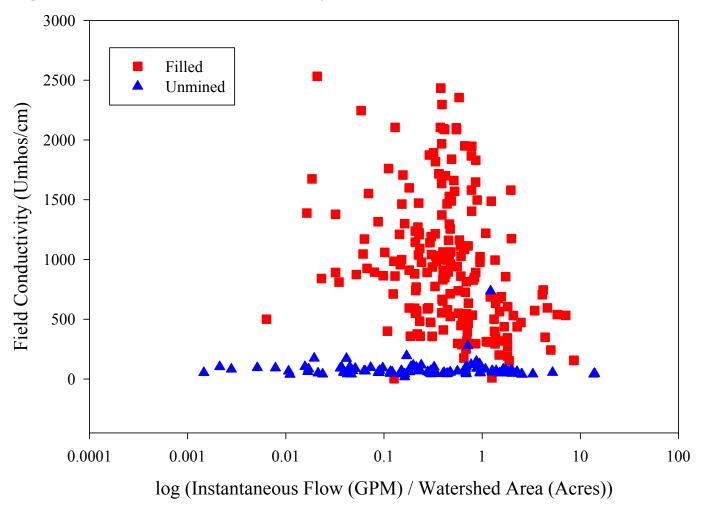
It is no surprise that MTM/VF operations increase the conductance of streams draining the disturbed areas. Figure Cond-2 plots the conductivity vs the normalized flow rate (the flow rate measured at the time of sampling divided by the drainage area for that site) for two categories of sites - Filled and Unmined. Unmined sites have a consistently low conductivity no matter what the flow. Filled sites have a broad range of conductivity much higher than Unmined sites indicating that MTM/VF mining increases specific conductance in streams. In larger drainage area sites it is common to have lower flows associated with higher conductivity. This is discussed at the end of this report under the topic Flow Rate Data.



5.9 Selenium Data

The selenium data indicate numerous violations of the West Virginia stream water quality criterion related to MTM/VF mining. Further discussion of selenium results is located in the

Figure Cond-2. Field Conductivity vs. Instantaneous Flow / Watershed Area



section of this report describing compliance with stream water quality criteria.

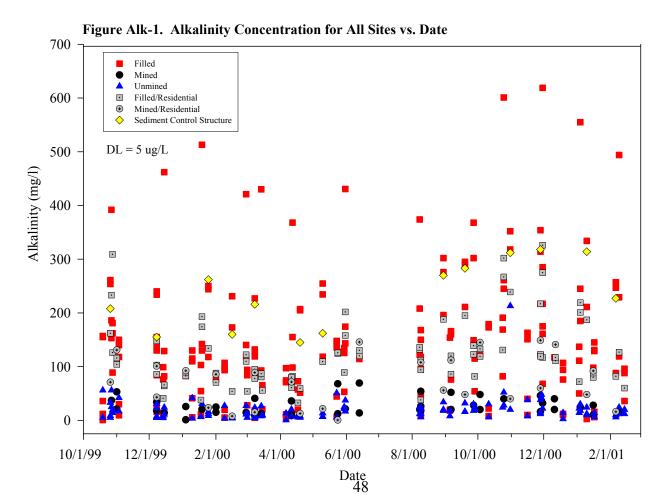
5.10 Alkalinity Data

According to the 18th Edition of Standard Methods, alkalinity of a water is its acid-neutralizing capacity and is primarily a function of carbonate, bicarbonate, and hydroxide content. Alkalinity is not a specific substance but rather combination of substances. Regarding the impact of alkalinity on aquatic life, the California State Water Resources Control Board's *Water Quality Criteria* states:

It is generally recognized that the best waters for support of diversified aquatic life are those with pH values between 7 and 8, having a total alkalinity of 100 to 120 mg/L or more. This alkalinity serves as a buffer to help prevent any sudden change in pH value, which might cause death to fish or other aquatic life.

5.10.a Alkalinity Concentration in Stream Samples

The concentration of alkalinity in samples from all sites vs date are plotted in Figure Alk-1. The detection limit was 4 mg/L. Values for many Filled sites are several times higher than the Unmined sites. Twelve of the thirteen highest values are from site MT-34B and those concentrations are even higher than the values at the Sediment Control Structure which is on a reclaimed MTM/VF mine. The increase in alkalinity at a MTM/VF mine site is sometimes augmented by liming of areas being reclaimed to improve vegetation growth or by addition of alkaline materials during the mining process to line ditches to neutralize acidic materials. There are also some chemical treatment facilities upstream of some sites. These facilities usually add excess alkalinity as they neutralize acid mine drainage or remove manganese to comply with

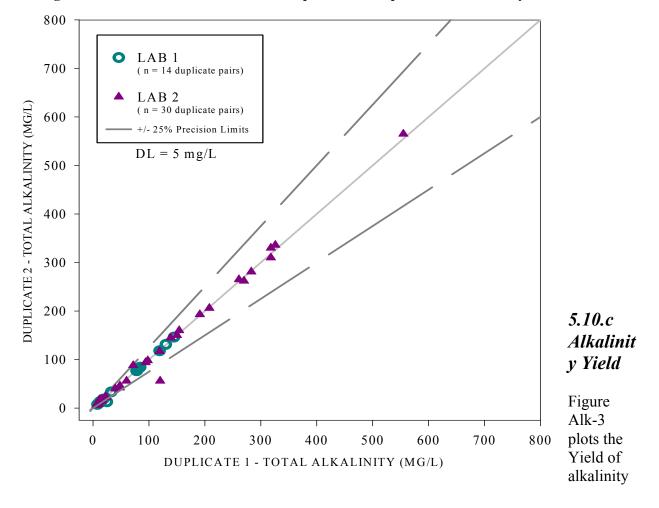


permit limits on discharges. These factors also influence other parameters like specific conductance, dissolved solids, and hardness.

5.10.b QA Samples for Alkalinity

Figure Alk-2 presents a plot of the concentration of duplicate samples. Data from both laboratories is precise over a range from the detection limit of 5 ug/L to a maximum of 600 mg/L

Figure Alk-2. Concentration of Duplicate Samples for Alkalinity



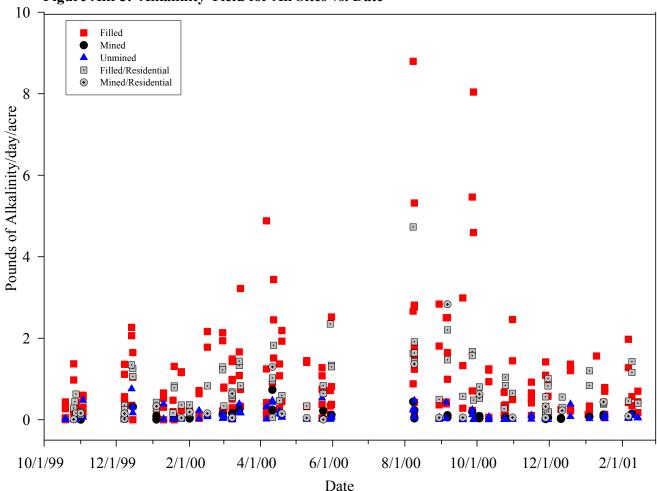


Figure Alk-3. Alkalinity Yield for All Sites vs. Date

for all samples. Yield rates for Unmined sites are less than 1 pound per day per acre while Yield rates at Filled sites range to 5 pounds per day per acre. There appears to be a slight decrease in alkalinity yield during fall and winter months. The highest yield was at MT-34B in August 2000. Other high yield values are from various sites scattered across the study area.

5.11 Potassium Data

The California State Water Resources Control Board's *Water Quality Criteria* reports that potassium is a common element constituting 2.4 percent of the earth's crust. Potassium salts are extremely soluble and can usually only be removed from water through evaporation. Potassium is an essential nutritional element for humans but acts as a cathartic in concentrations greater than 2000 mg/L. Regarding impacts to fish and other aquatic life, the report states:

The toxicity of potassium to fish is reduced by calcium, and, to a lesser degree, by sodium. Potassium is more toxic to fish and shellfish than calcium, magnesium, or sodium. ... Several investigators found, independently, that potassium could be toxic to fish in soft or distilled waters at concentrations of 50-200 mg/L

Potassium is a component of many fertilizers which are sometimes applied to mined areas to stimulate vegetation growth. This practice could be augmenting the increase of potassium in streams below mine sites being reclaimed.

5.11.a Potassium Concentration in Stream Samples

Figure K-1 shows the concentration of potassium in samples from all sites vs date. The detection limit was 0.1 mg/L for Laboratory 1 and 0.75 mg/L for Laboratory 2. The potassium data from both laboratories passed the QA review with only two samples being rejected and those were at Laboratory 1.

The higher concentrations are consistently at sites in the Filled category indicating that MTM/VF

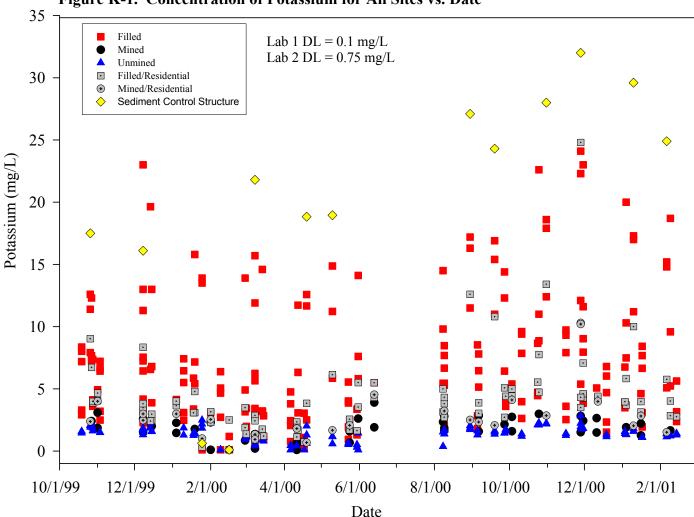


Figure K-1. Concentration of Potassium for All Sites vs. Date

mining operations increase the concentration of potassium in streams. There are 40 values above 10 mg/L and 29 of those are in the Mud River, 10 in the Spruce Fork, and one in the Clear Fork watersheds. All sites in the Unmined category have low concentrations of potassium.

5.11.b QA Samples for Potassium

Figure K-2 plots the concentration of potassium in all duplicate samples collected during this study. The plot indicates the data are more precise at the second laboratory over the range of concentrations from the detection limit to about 30 mg/L.

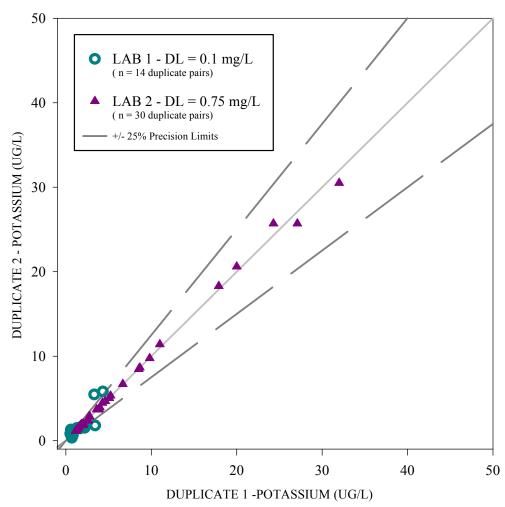
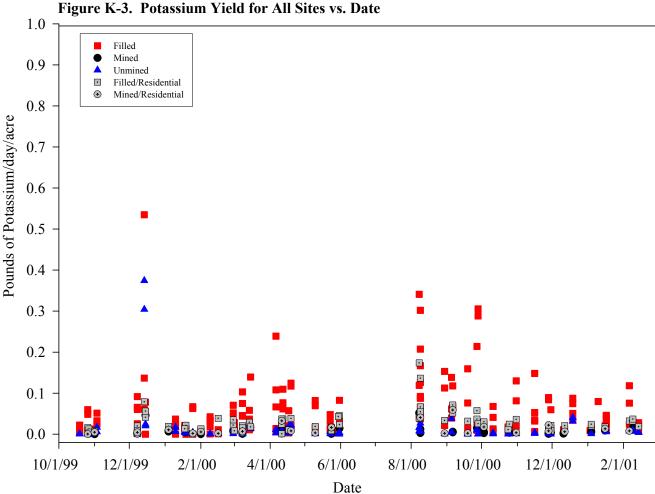


Figure K-2. Comparison of Duplicate Samples - Potassium

5.11.c Potassium Yield

Figure K-3 plots the Yield of potassium for samples from all sites vs date. The data would indicate that potassium Yield rates are generally below 1 pound per day per acre, but the higher values are usually from sites in the Filled category. The three higher yield values for samples collected in December 1999 are all in the same watershed. They are sites MT-50, 51, and 52. The yield rates are believed to elevated on this occasion due to recent rains. The note on the field sheet states "Heavy precipitation in the last 24 hours." None of the higher concentrations for the December 1999 samples were from these three sites so the increase in flow rates resulted in higher vield rates.

5.12 Sodium Data



The California State Water Resources Control Board's Water Quality Criteria states:

This very active metal does not occur free in nature, but sodium compounds constitute 2.83 percent of the crust of the earth. Owing to the fact that most sodium salts are extremely soluble in water, any sodium that is leached from soil or discharged by industrial wastes will remain in solution.

Regarding the impact on fish and aquatic life, the report states:

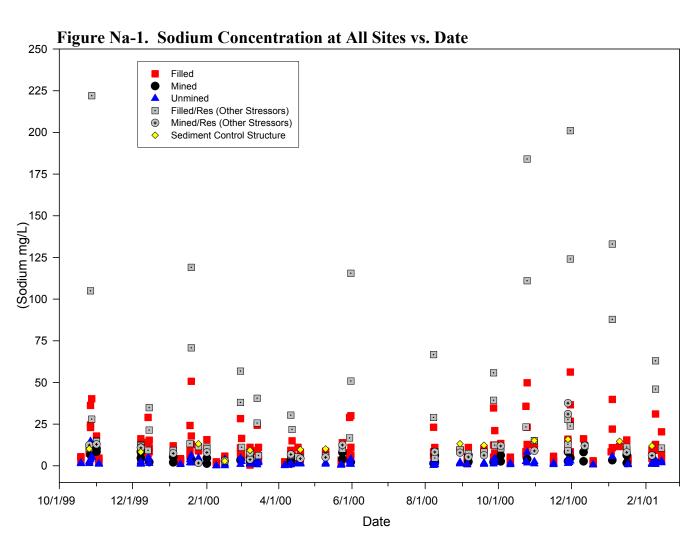
Of the United States waters supporting good fish fauna, ordinarily the concentration of sodium plus potassium is less than 6 mg/L in about 5 percent; less than 10 mg/L in about 50 percent; and less than 85 mg/L in about 95 percent.

5.12.a Sodium Concentration in Stream Samples

Sodium concentrations for all sites are plotted in Figure Na-1. The detection limit was 1 mg/L The highest values are for sites in the category Filled/Residences and occurred in the Spruce Fork watershed at sites MT-40 and MT-48. MT-40 is downstream of 7 MTM/VF mine permits and 3 refuse piles while MT-48 is below four communities. Possible sources of sodium would be mine drainage treatment facilities using sodium hydroxide and winter time salting of highways.

5.12 c QA Samples for Sodium

The results of duplicate samples are plotted in Figure Na-2. The detection limit was 1 mg/L. The



data are very precise with multiple values below about 60 mg/L. The one value at slightly over 200 mg/L also is very precise. Both laboratories have good precision for this parameter.

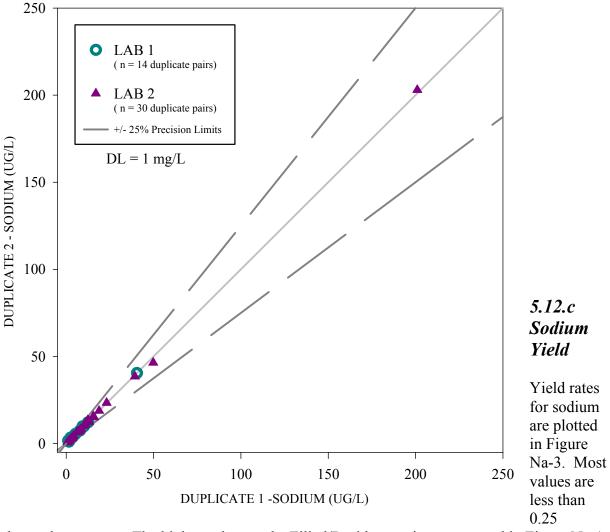
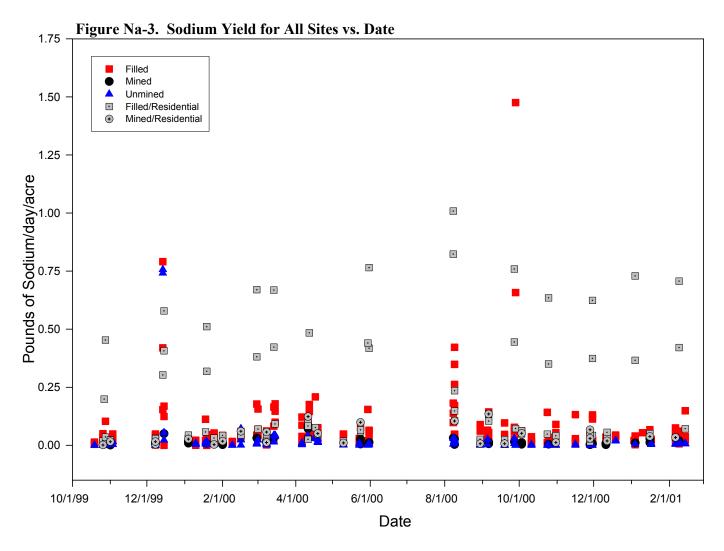


Figure Na-2. Sodium Concentration of Duplicate Samples

pounds per day per acre. The higher values at the Filled/Residence sties were noted in Figure Na-1 also and are possible related to use of road salt or the use of sodium hydroxide in chemical treatment facilities at mine discharges. There are higher values on two sample occasions - December 1999 and September 2000. The three values near 0.75 pounds per day per acre in December 1999 were at MT-50, 51, and 52. The field sheet not for those samples noted "Heavy precipitation in the last 24 hours." The higher yield rates for the Filled/ Residential sites is for MT-40 and MT-48, which correspond to the higher concentrations listed earlier in Figure Na-1 showing concentrations vs date. The highest yield of 1.5 pounds per day per acre is at site MT-60. The flow rate for that sample was the highest recorded for that site during this study while the



concentration was 21.1 mg/L, below the average for that site (30.5 mg/L). There were no comments on the field sheet indicating anything unusual.

5.13 Chloride Data

Chloride is one of the parameters limited by WVDEP water quality criteria and is discussed later in the report under that topic.

5.14 Acidity Data

Acidity, like alkalinity is not a specific chemical but instead is a measure of the effects of a combination of substances and conditions in the water. Waters can have both acidity and alkalinity values at the same time. Acidity may be present from natural causes and from human activity. Acid waters are sometimes formed as a result of mining activity, especially in sulfur bearing formations. Regulations have sought to address concerns with excess acidity resulting

from mining activities through the permitting processes. There are elaborate regulations which focus on determining and minimizing the potential for forming acid waters. There are also effluent limits on the pH (discussed later in this report) of discharges.

Acidity was detected in 20 % of the 399 samples that passed the QA/QC review. The second laboratory found acidity in 31 samples above the detection limit of 2 mg/L. Twenty of these detected values came from sites in the Filled category. The site with the highest concentrations of acidity was MT-34B, a site in the Filled category with an active mine upstream. Five of the 31 values came from this site and they ranged from 29 mg/L to 40 mg/L. However, there were no violations of the stream limits on pH at this site. The only violations of the stream criteria for pH detected were at Unmined sites.

Acidity in streams can be increased by MTM/VF mining but mine permitting activities address this potential problem.

5.15 Nitrate and Nitrite Data

The *Water Quality Criteria*, 1972 "Blue Book" discusses Nitrate-Nitrite in water supplies and notes that chlorination converts the nitrite to nitrate. They make the following recommendation concerning nitrate in water:

On the basis of adverse physiological effects on infants and because the defined treatment process has no effect on the removal of nitrate, it is recommended that the nitrate-nitrogen concentration in public water supply sources not exceed 10 mg/L. On the basis of its high toxicity and more pronounced effect than nitrate, it is recommended that the nitrite-nitrogen concentration in public water supply sources not exceed 1 mg/L.

The California State Water Resources Control Board's *Water Quality Criteria* also discusses nitrate and nitrite and notes that nitrites are often formed in streams by the natural degradation of ammonia and organic nitrogen. Since they are usually quickly oxidized to nitrates, they are seldom present in surface waters in significant concentrations. The presence of nitrates and nitrites usually indicates an organic loading source such as sewage or fertilizer. Regarding the impact on fish and other aquatic life, the report states:

High nitrate concentrations in effluents and water stimulate the growth of plankton and aquatic weeds. By increasing plankton growth and the development of fish food organisms, nitrates indirectly foster increased fish production. Hart et al. report references to the effect that United States waters supporting a good fish life ordinarily 5 percent have less than 0.2 mg/L of nitrates; 50 percent have less than 0.9 mg/L; and 95 percent have less than 4.2 mg/L.

5.15.a Nitrate-Nitrite Concentration in Stream Samples

The laboratory data for nitrate and nitrite is somewhat confusing and of mixed quality, partly due to changes in what parameters were being measured. The first laboratory began this survey analyzing for nitrates and nitrites separately but it was soon evident that the 48 hour holding time was difficult to meet. The parameter was switched to nitrate - nitrite (nitrogen) which has a 28 day holding time for the contract with the second laboratory. The data from the first laboratory was often rejected for holding time violations and only 54 % of the nitrate samples and 66% of the nitrite samples passed the QA review. The second laboratory began testing for nitrate and nitrite separately but soon switched to nitrate plus nitrite as nitrogen. The first samples at the second laboratory were manually converted to nitrate plus nitrite as nitrogen values and entered into the database. Overall 94 % of the data from the second laboratory for nitrate plus nitrite as nitrogen passed the QA/QC review. The detection limit was 0.1 mg/L. The highest value detected at the second laboratory was 23.4 mg/L at site MT-18, a site in the Filled category, on 01/10/00. Some high values might be caused by careless handling of the nitrogen compound explosives used at surface mines or when nitrogen containing fertilizers are spread on surface mines to encourage growth of vegetative cover during reclamation, but it is not known if this might be part of the cause for this elevated value. Many samples had no detectable concentrations and they were in all categories of sites. The Unmined site with the most detectable concentrations and the highest values (second lab data only) was MT-95 in the Twentymile Creek watershed. Nitrate plus nitrite as nitrogen values ranged from 0.73 mg/L to 1.1 mg/L in each of the six samples from the site.

MTM/VF mining operations can increase the concentration of nitrate plus nitrite as nitrogen in streams.

5.16 Parameters Present in Low Concentrations

5.16.a Total Phosphorous

Phosphorous was detected in only one of 213 samples at the second laboratory. The concentration was 0.12 mg/L. No samples were rejected in the QA/QC review. Since the detection limit was 0.10 mg/L, this would indicate that stream concentrations of phosphorous are not being measurably impacted by MTM/VF mining.

5.16.b Total Copper, Lead and Nickel

Copper, lead, and nickel were usually below the detection limit for all samples tested at the second laboratory but several samples had detectable concentrations as listed below. The only obvious pattern observed in the data is that many of the detections were in the Mud River watershed (MT-01 through MT-24). Site MT-24, a site on a reclaimed MTM/VF mine, had three measurable values of copper, all near the detection limit, no nickel values, and six of the eight detections for nickel. There is no clear indication that MTM/VF mining caused any changes in these metal concentrations in streams.

| Site ID | Category | Date | Copper (DL = 5 ug/L) | Lead (DL = 2 ug/L) | Nickel (DL= 20 ug/L) |
|---------|----------|----------|----------------------|-----------------------|-------------------------|
| MT-01 | Min/Res | 01/10/01 | 10.3 | ND | ND |

| | 1 | 1 | | | |
|--------|----------------------------------|--|--|----------------------------------|---|
| MT-13 | Unmined | 11/28/00 | 14.8 | 3.76 | ND |
| MT-14 | Filled | 08/30/00 | 7.64 | 2.14 | ND |
| MT-18 | Filled | 08/30/00 | 7.41 | ND | ND |
| MT-23 | Fill/Res | 08/30/00 11/28/00 | 20.4 5.6 | 2.1 ND | ND ND |
| MT-24 | Sediment Control Structure | 08/30/00 09/19/00 10/31/00 11/28/00 01/10/01 02/06/01 | 8.15 ND 6.56 5.83 ND ND | ND ND ND ND ND ND | 35.5 36.8 71.8 63.4 115 80.4 |
| MT-39 | Unmined | 11/29/00 | 5.23 | 7.4 | ND |
| MT-50 | Unmined | 08/09/00 | ND | 4.48 | ND |
| MT-57B | Filled | 08/09/00 | ND | 16.2 | ND |
| MT-62 | Fill/Res | 09/06/00 | ND | ND | 37.6 |
| MT-64 | Filled | 09/06/00 | ND | ND | 39.5 |
| MT-69 | Min/Res | 11/28/00 | 6.72 | ND | ND |
| MT-79 | Mined | 11/28/00 01/16/01 | 8.01 5.23 | ND ND | ND ND |
| MT-81 | Mined | 11/28/00 | ND | 13.8 | ND |

5.17 Other Parameters Detected in Measurable Concentrations

5.17.a Total Barium

Barium was detected in 96 % of the 213 samples analyzed at the second laboratory. The detection limit was 20 ug/L. Concentrations are plotted in Figure Ba-1. They range to 250 ug/L but most values are below 75 ug/L. There were higher values on 9/27/00 and 11/28/00. The three samples in September were from MT-39 (138 ug/L), MT-40 (145 ug/L) and MT-42 (214 ug/L), all in the Spruce Fork watershed. Each concentration was two to three times the average for each site and flows were higher than average as well. A note on the field sheets for that day stated, "Recent heavy rains have changed the stream bottom ..." Sites MT-39 and 42 are both Unmined. The data would indicate there was a temporary release of barium in these two tributary watersheds and in fact the decreasing concentration of barium at downstream site MT-48 (47.8 ug/L) would also fit that theory. Barium muds are used in drilling for oil and gas. The highest concentration at any site was detected 11/28/00 at site MT-01 (214 ug/L) in the headwaters of the Mud River. The next site downstream on the Mud, MT-23 also had a higher than normal concentration of barium area. (107ug/L). This appears to be another instance of a temporary release of barium in a headwater area.

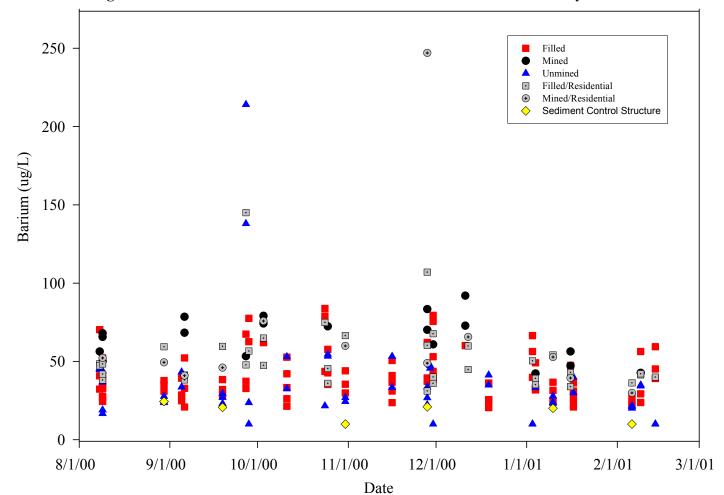


Figure Ba-1. Concentration of Barium for All Sites vs. Date - Lab 2 Only

The only field note the crew made for that set of samples was for site MT-23 where they stated,"Beaverdam constructed downstream affecting depth and velocity flow measurements." The mix of categories of sites across the range of concentrations and over the study period have no obvious patterns. Some Unmined sites have an elevated barium concentration while the sediment control structure and some Filled sites consistently have low concentrations of barium.

Duplicate sample results are presented in Figure Ba-2. The data indicate excellent precision to roughly 100 ug/L (five times the detection limit).

There is no clear indication that MTM/VF mining changes the concentration of barium in streams.

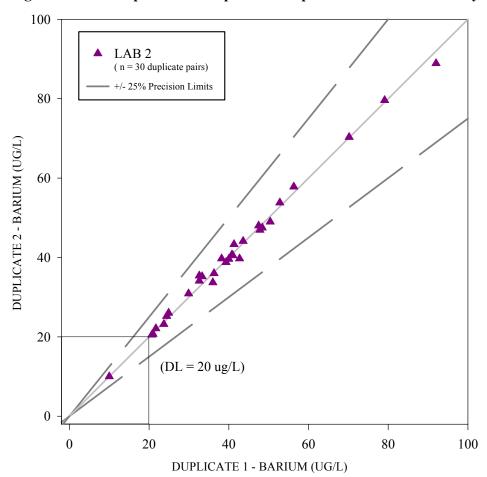


Figure Ba-2. Comparison of Duplicate Samples - Barium - Lab 2 Only

5.17.b Total Zinc

Zinc was detected in 51 % of the 199 samples that passed the QA/QC review and were analyzed in the second laboratory. The detection limit was 10 ug/L. The values are presented in Figure Zn-1.

Most values are below 20 ug/L where there was less precision in laboratory results. Zinc concentrations were elevated at MT-24, the Sediment Control Structure indicating that MTM/VF mining could cause elevated levels of zinc in streams, however there are also high values for zinc at four different Unmined sites (MT-50 on 8/9/00, MT-95 on 9/5/00, MT-13 on 11/28/00 and MT-39 on 11/29/00).

Duplicate sample results are presented in Figure Zn-2. The data indicate there were precision problems below a concentration of roughly 25 ug/L. Duplicate sample values range to roughly 45 ug/L which is 4.5 times the detection limit. Since most of the values from sites were below 25

120 Filled Mined Unmined Filled/Residential 100 Mined/Residential Sediment Control Structure DL = 5 ug/L80 Zinc (ug/L) 60 40 ٠ • 20 0 10/1/00 1/1/01 8/1/00 9/1/00 11/1/00 12/1/00 2/1/01 3/1/01 Date

Figure Zn-1. Concentration of Zinc for All Sites vs. Date - Lab 2 Only

ug/L where there was less precision, there is no clear indication that MTM/VF mining changes the concentration of zinc in streams.

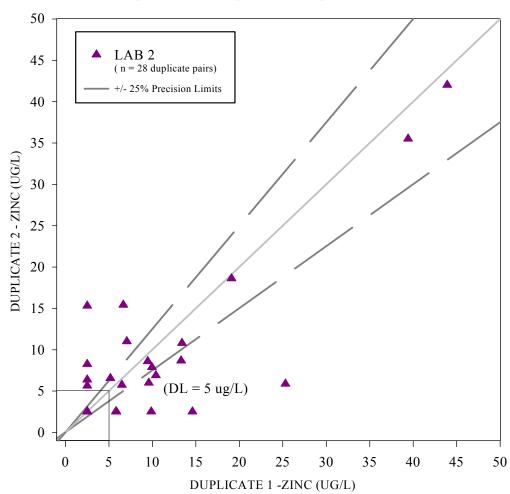


Figure Zn-2. Comparison of Duplicate Samples - Zinc - Lab 2 Only

5.17.c Total Organic Carbon & Dissolved Organic Carbon

TOC and DOC results were generally very low near the detection limit of 1 mg/L. There was a confounding factor with the DOC test in that something appeared to be leaching from the filter used to remove the suspended matter in the field. The field crews used 45micron cellulose acetate membrane disposable sterile syringe filters. Whatever this interfering material was, it would create an organic value of up to 2 mg/L in some samples resulting in QA/QC flags on data. Of the 213 samples collected, 180 TOC values passed the QA/QC review and 170 DOC samples passed. TOC was detected in 77 % of the samples and DOC was detected in 86 % of the samples passing QA/QC review.

Figure TOC-1 plots the results of duplicate samples for TOC at the second laboratory. It illustrates the lack of precision in concentrations below about 2.5 mg/L. The range of duplicate sample values went to 3 mg/L. The maximum concentration of TOC recorded at the second laboratory was 4.4 mg/L. Only 14 (10%) of the 138 values detected were above 2.5 mg/L. Four of the 14 were at Unmined sites.

Figure TOC-1. Comparison of Duplicate Samples - Total Organic Carbon - Lab 2 Only

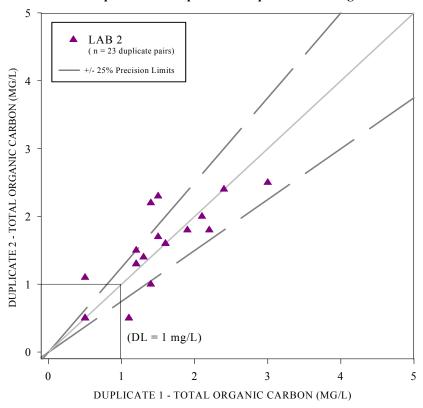


Figure DOC-1. Comparison of Duplicates - Dissolved Organic Carbon - Lab 2 Only

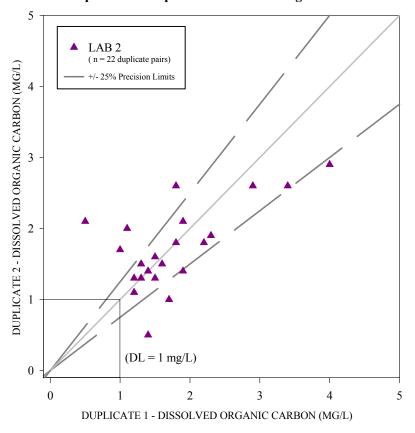


Figure DOC-1 plots the results of duplicate samples for DOC at the second laboratory. It also illustrates the lack of precision in concentrations for the range of values which went to about 4 mg/L. There is no clear indication that MTM/VF mining changes the concentration of TOC or DOC in streams.

5.17.d Total Suspended Solids

Coal mines have specially designed and constructed ditches and sedimentation ponds to reduce erosion and minimize the amount of suspended solids carried from a mine site in surface runoff. Large surface mine operations have elaborate systems required as part of their mining permits. Mine operators regularly monitor and maintain these facilities to capture sediment being washed from their mine site.

There were 213 samples for total suspended solids (TSS) analyzed at the second laboratory and none were rejected in the QA/QC review. A total of 69 of those samples (32 %) had concentrations at or above the detection limit of 5 mg/L. The values were low and this could be due to several factors including: dry fall weather; staff who chose not to sample on rainy days; because the sediment ponds below mined areas were working well; or other unknown causes. Whatever the cause, only 28 samples had a concentration above 10 mg/L. These values were from all categories of sites and are listed below. The data indicate that the concentration of TSS in the streams in the study area was usually below 5 mg/L during the study period.

| Site Identification | Category | Concentration (mg/L) |
|---------------------|------------------------|----------------------|
| MT-02 | Unmined | 19 |
| MT-13 | Unmined | 24 |
| MT-24 | Sediment Control Ditch | 21, 15, 14, 11 |
| MT-34B | Filled | 11 |
| MT-42 | Unmined | 65, 12 |
| MT-45 | Mined | 25 |
| MT-48 | Filled/Residences | 20 |
| MT-52 | Filled | 53 |
| MT-55 | Filled/Residences | 51 |
| MT-57B | Filled | 11 |
| MT-60 | Filled | 60, 25, 14 |
| MT-62 | Filled/Residences | 20, 16 |
| MT-64 | Mined/Residences | 32, 13, 12 |
| MT-69 | Mined/Residences | 18 |
| MT-75 | Filled/Residences | 19, 15 |
| MT-79 | Mined | 14 |
| MT-86 | Filled | 27 |
| MT-91 | Unmined | 21 |

6. COMPARISON WITH APPLICABLE STREAM WATER QUALITY CRITERIA

The grab samples collected in this study are compared to the "not to exceed" limits set to protect aquatic life. A detailed description of West Virginia's stream water quality criteria is included in Attachment 1. There are ten applicable parameters that have stream limits set to protect aquatic life and have a maximum or minimum limit. They will be discussed in alphabetical order.

Only the results from the second laboratory are included in this comparison. Laboratory results for metals were more precise at the second laboratory than at the first according to the data from duplicate samples. There were fewer instances of contaminated blank samples in the data from the second laboratory (see Table 3). There were far fewer laboratory results rejected in the QA/QC review at the second laboratory than at the first (see Table 5).

6.1 Total Aluminum - Maximum 750 ug/L

There were 213 samples for total aluminum sent to the second laboratory and one result was rejected in the QA/QC review resulting in 99.53 % completeness. The detection limit was 100 ug/L.

6.1.a Aluminum Concentration in Stream Samples

Aluminum was found in samples from all classes of sites and from sites spread across the study area but generally at concentrations below 250 ug/L. There were no sample results from the second laboratory that exceeded the stream criterion for aluminum Six samples collected 8/9/00 had higher concentrations of aluminum but they were flagged as estimates due to contamination of the blank. The three values above 750 ug/L on that date are not considered as violations of the stream criterion since they were flagged as estimates.

Figure Al-1 plots the concentration of aluminum for samples tested at the second laboratory. Most values are below 250 ug/L where there was less precision in duplicate sample results.

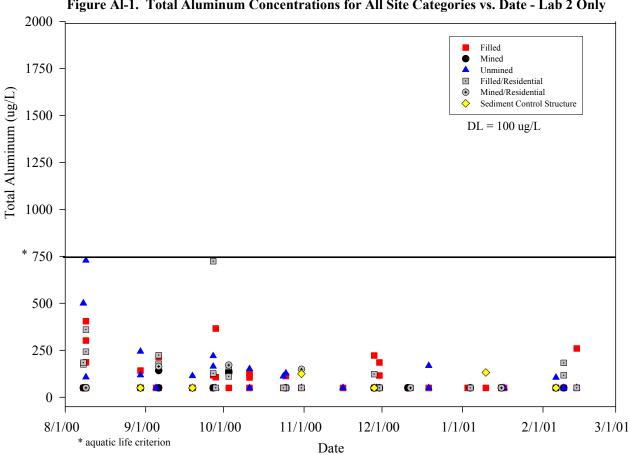


Figure Al-1. Total Aluminum Concentrations for All Site Categories vs. Date - Lab 2 Only

Duplicate sample results (29 pairs) are presented in Figure Al- 2. It is obvious from the Figure that the precision wavers a bit as the concentrations approach the detection limit. Forty-eight blank samples were tested and three were found to have detectable concentrations of aluminum. Two of those were near the detection limit. The high aluminum in one blank sample lead to having the data flagged as an estimate for that blank sample as well as the stream samples collected by that crew that day.

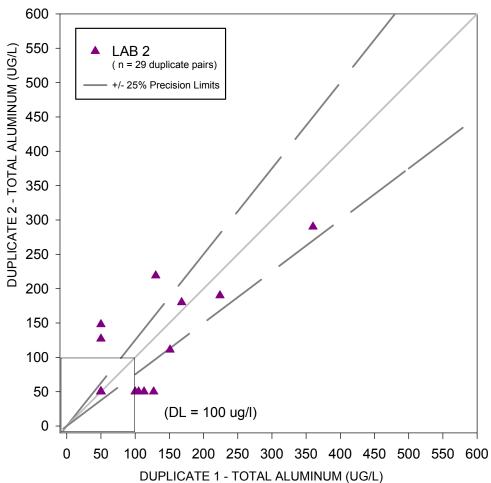


Figure Al-2. Comparison of Duplicate Samples - Total Aluminum - Lab 2 Only

6.1.b Aluminum Yield

The Yield values for total aluminum have been plotted vs date and are presented in Figure Al-3. Most yield rates are below 0.01 pounds per day per acre and there is no obvious pattern in the results. MTM/VF mining does not appear to produce a great difference in the Yield of aluminum within the study area.

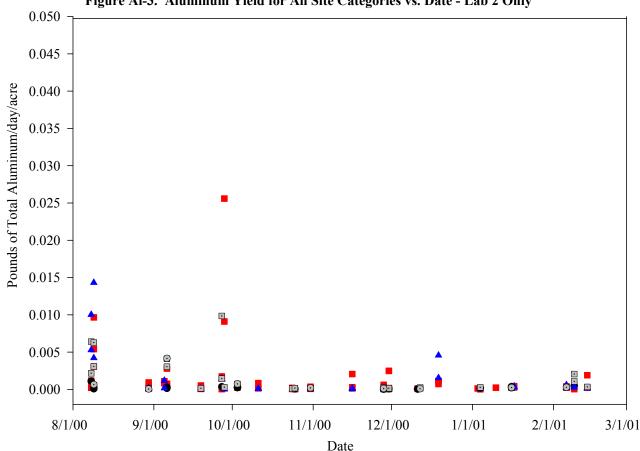


Figure Al-3. Aluminum Yield for All Site Categories vs. Date - Lab 2 Only

6.1.c Dissolved Aluminum

Field crews filtered samples to check for dissolved aluminum. The second laboratory detected it in only five (2 %) of 213 samples with the maximum value being 129 ug/L. The values are listed below. Dissolved aluminum was detected in only one set of duplicate samples at the second laboratory at the detection limit of 100 ug/L. There is no clear indication that MTM/VF mining changes the concentration of dissolved aluminum in streams.

| Site | Category | Dissolved Aluminum (ug/L) |
|-------|-------------------|---------------------------|
| MT-39 | Unmined | 121 |
| MT-45 | Mined | 110 |
| MT-69 | Mined/Residences | 100 |
| MT-75 | Filled/Residences | 105 |
| MT-79 | Mined | 129 |

6.2 Total Beryllium - Maximum 130 ug/L

The second laboratory analyzed 213 samples for beryllium in this study. The QA/QC review rejected none of those values resulting in 100 % completeness. Beryllium was not detected in any samples analyzed at the second laboratory. There was no detectable concentration of beryllium in any duplicate sample nor in any blank sample. There is no indication that MTM/VF mining changed the concentration of beryllium in streams in the study area.

6.3 Chloride - Maximum 230 mg/L

There were 213 samples analyzed for chloride by the second laboratory during this study. None were rejected in the QA/QC review resulting in 100 % completeness for the data set. The maximum concentration of chloride was 37.6 mg/L. The detection limit was 5 mg/L. None of the blank samples had detectable levels of chloride. There is no indication that MTM/VF mining caused any violation of WVDEP's stream water quality criterion for chloride during this study.

6.4 Dissolved Oxygen - Minimum 5.0 mg/L

Dissolved Oxygen is a field reading. There were 475 field readings for Dissolved Oxygen and 12 were rejected in the QA/QC review. The percent completeness in 97.47 %. Only 9 of the values were less than the minimum stream criterion of 5 mg/L, and they are listed below in Table DO-1. The minimum value recorded was 3.77 mg/L but all other values were in the 4 mg/L range. They were measured in June, August, or October. One was at an Unmined site, five were in Mined sites, and one each in Filled, Filled/Residence, and Mined/Residence.

TABLE DO-1
Samples Not Meeting Aquatic Life Minimum Criterion of 5.0 mg/L for Dissolved Oxygen

| Samples 110t Necting requeste Enervinnman enterior of 5to mg/E for Bissorved Oxyge | | | |
|--|-------------------|-------------|--------------|
| Station ID | EIS CLASS | SAMPLE DATE | VALUE (mg/L) |
| MT13 | Unmined | 10/26/99 | 3.77 |
| MT79 | Mined | 06/13/00 | 4.09 |
| MT79 | Mined | 08/09/00 | 4.12 |
| MT78 | Mined | 08/09/00 | 4.25 |
| MT81 | Mined | 06/13/00 | 4.37 |
| MT81 | Mined | 08/09/00 | 4.38 |
| MT75 | Filled/Residences | 06/13/00 | 4.47 |
| MT69 | Mined/Residences | 06/13/00 | 4.66 |
| MT64 | Filled | 06/13/00 | 4.88 |

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WVDEP's stream criterion for Dissolved Oxygen was violated in only 2% of the samples in this study and those were in the seasons of summer and fall. There is no indication that MTM/VF mining caused violations of dissolved oxygen criteria in the study area.

6.5 Total Iron - Maximum 1,500 ug/L

There were 213 samples analyzed for iron at the second laboratory and eight were rejected in the QA/QC review resulting in 96.24 % completeness. The detection limit was 100 ug/L.

6.5.a Iron Concentration in Stream Samples

The iron concentration of each stream sample analyzed at the second laboratory during this study is presented in Figure Fe-1. The stream criterion of 1500 ug/L is indicated on the figure. There were no violations of the criterion for iron, but several samples from sites in the category Filled approached the limit during the fall of 2000. There is no clear indication that MTM/VF mining caused violations of the iron limit in streams in the study area.

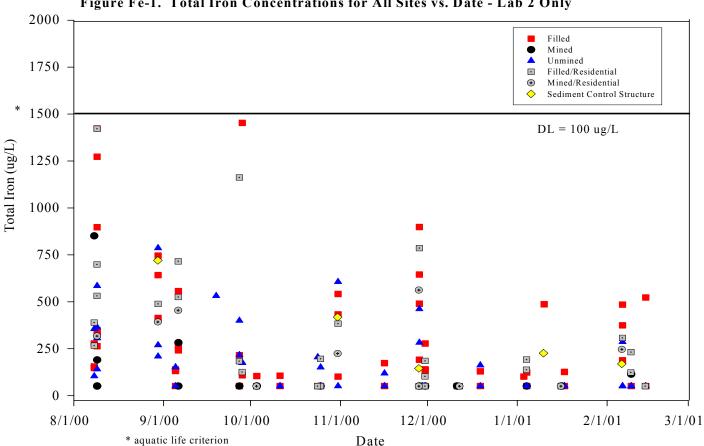


Figure Fe-1. Total Iron Concentrations for All Sites vs. Date - Lab 2 Only

The results of duplicate samples are plotted in Figure Fe-2. The results are precise in the higher concentrations but waver as the concentration approached the detection limit. Only one of the 47 blank samples had a detectable concentration of iron.

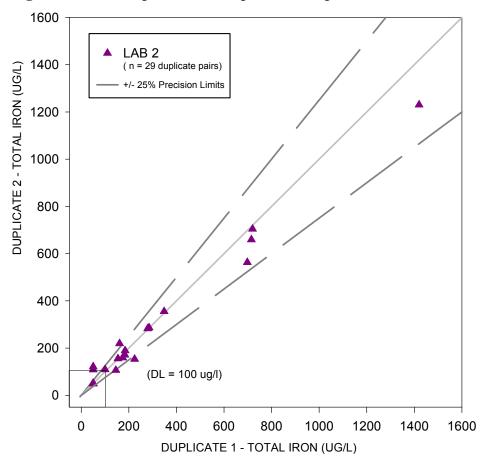


Figure Fe-2. Comparison of Duplicate Samples - Total Iron - Lab 2 Only

6.5.b Iron Yield

The Yield values for iron have been plotted vs date and are presented in Figure Fe-3. Although there are a couple higher values at Filled sites, most are values are below 0.01 pounds per day per acre. Variations in Yield rates for total iron could have several causes including changing amounts of suspended sediment that contains iron. The amount of suspended sediment in a stream is impacted by rainfall, ponds and vegetation cover on mine sites. The actual cause of the variation observed here is not known. There is no clear indication that MTM/VF mining changes Iron Yield in the study area.

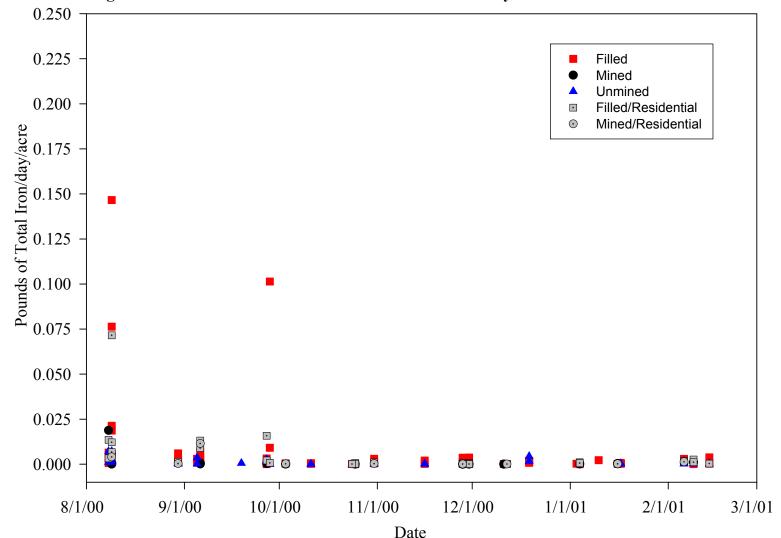


Figure Fe-3. Iron Yield for All Sites vs. Date - Lab 2 Only

6.5.c Dissolved Iron

Dissolved iron was filtered in the field and 208 samples analyzed at the second laboratory passed the QA/QC review. A total of 33 samples (16 %) had values above the detection limit of 100 ug/L. Four of those samples came from two sites in the "Unmined" category while twenty-one of the samples came from nine sites in the "Filled" category. The "Filled" site MT-18 had dissolved iron on each sampling occasion ranging from a low of 200 ug/L to a high of 490 ug/L. The adjacent "Filled" site MT-14 had five detectable values from 110 ug/L to 483 ug/L. The other seven "Filled" sites had detectable concentrations of dissolved iron on only one or two occasions. Some "Filled" sites have persistent dissolved iron up to 480 ug/L and some "Unmined" sites have intermittent dissolved iron up to 390 ug/L.

6.6 Total Mercury - Maximum 2.4 ug/L

There were 213 samples analyzed for mercury at the second laboratory and 174 values passed the QA/QC review. The percent completeness is 81.69 %. None of the samples had a detectable concentration of mercury. The detection limit was 0.2 ug/L. No stream samples results exceeded the stream criterion of 2.4 ug/L. There is no indication that MTM/VF mining activities cause a measurable increase in the concentration of mercury in streams in the study area.

6.7 pH - Minimum 6.0, Maximum 9.0

There were pH measurements made in the field and the laboratory in this study, but only the field values are valid in evaluating compliance with stream limits. All 476 records of field pH in this study have been judged valid so the data set completeness is 100 %. Only three of those values fell outside of the limits of 6.0 to 9.0 set by the WVDEP. All three were for Unmined sites. This could be a result of acid deposition but that is not known for sure. The sites are:

Table pH - 1. Samples Not Meeting pH Criteria - 6.0 to 9.0

| Station ID | EIS Category | Sample Date | Value |
|------------|--------------|-------------|-------|
| MT-03 | Unmined | 11/28/00 | 5.87 |
| MT-13 | Unmined | 11/28/00 | 5.44 |
| MT-50 | Unmined | 08/09/00 | 5.79 |

There were no violations of stream pH criteria resulting from MTM/VF mining identified during this study.

6.8 Total Selenium

There were 213 samples analyzed for selenium in the second laboratory for this study. The QA/QC review rejected three values resulting in 98.59 % completeness. The detection limit was 3 ug/L at the second laboratory.

Selenium is essential for life in very small amounts but is highly toxic in slightly greater amounts (Lemly 1996, page 427). In 1987, the EPA lowered the recommended stream water quality criterion for selenium to 5 ug/L to protect aquatic life. West Virginia has adopted that same limit as their stream criterion. Selenium is strongly bioaccumulated in aquatic habitats (Lemly 1996, page 435). "Waterborne concentrations in the low-ug/l range can bioaccumulate in the foodchain and result in an elevated dietary selenium intake and the reproductive failure of adult fish with little or no additional symptoms of selenium poisoning in the entire aquatic system. The

most widespread human-caused sources of selenium mobilization and introduction into aquatic ecosystems in the U.S. today are the extraction and utilization of coal for generation of electric power and the irrigation of high-selenium soils for agricultural production" (Lemly 1996, page 437).

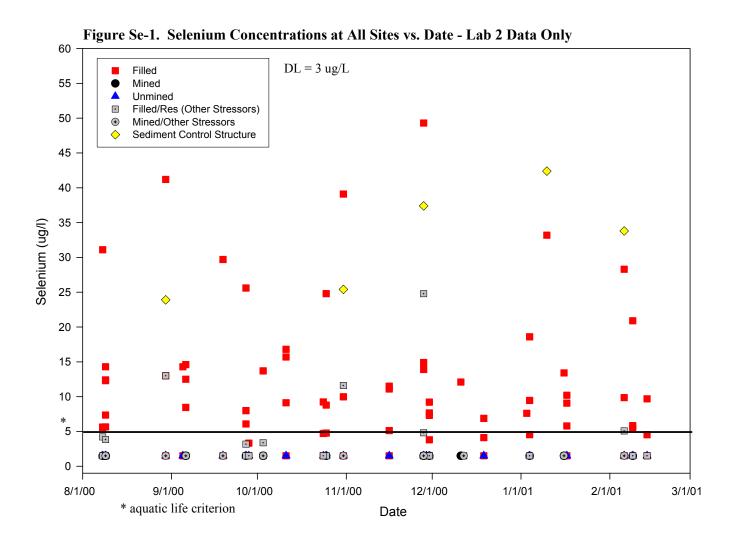
The West Virginia Geologic and Economic Survey has information on selenium posted on their website (http://www.wvgs.wvnet.edu/www/datastat/te/SeHome.htm). It notes:

Selenium occurs in coal primarily within host minerals, most within commonly occurring pyrite...... An unpublished study at WVGES using SEM found selenium ... in 12 of 24 coal samples studied, mainly in the upper Kanawha Formation coals. Selenium in West Virginia coals averaged 4.20 ppm...... Coals containing the highest selenium contents are in a region of south central WV where Allegheny and upper Kanawha coals containing the most selenium are mined.... Selenium is not an environmental problem in moist regions like the Eastern U.S. where concentrations average 0.2 ppm in normal soils.

Summarizing this information, we see that in the region MTM/VF mining, the coals can contain an average of 4 ppm of selenium, normal soils can average 0.2 ppm, and the allowable limits in the streams are 5 ug/L (0.005 ppm). Disturbing coal and soils during MTM/VF mining could be expected to result in violations of the stream limit for selenium.

6.8.a Selenium Concentration in Stream Samples

Laboratory results for selenium from the second laboratory are shown in Figure Se-1. There are 66 violations of the stream criterion. All values above the stream criterion of 5 ug/L are at Filled sites and many of those are several times greater than the detection limit of 3 ug/L. The elevated values of selenium appear to be closely related to MTM/VF mining activity. There were 30 sets of duplicate samples for selenium tested in the second laboratory. One set of duplicate samples was rejected in the QA/QC review. Figure Se-2 plots the results of duplicate samples. The precision of results of the duplicate samples at the second laboratory indicate that data can be used to identify violations of the stream criterion for selenium.



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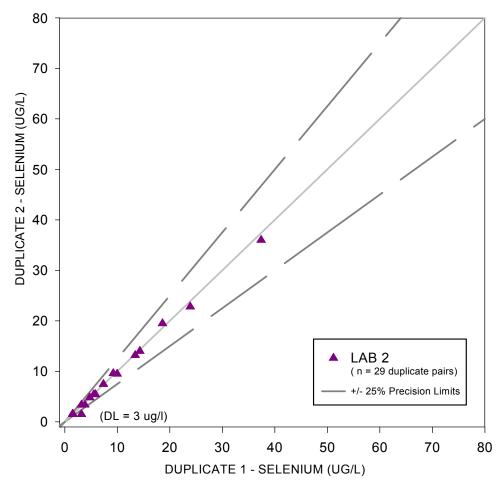


Figure Se-2. Comparison of Duplicate Samples Total Selenium - Lab 2 Only

Accuracy was evaluated using spiked duplicates samples prepared in the laboratory and reviewed in the QA/QC review. Only one of the 50 blank samples tested in the second laboratory had a detectable concentration of selenium. The selenium dataset from the second laboratory is suitable for evaluating violations of the stream criterion of 5 ug/L.

6.8.b Selenium Yield

The Yield of selenium for all site samples is presented in Figure Se-3. The very low Yield rates for selenium are evident in the Figure. As noted earlier, even very small amounts of selenium in coals and soils can leach or erode to streams and exceed the water quality criterion. The Yield rates in sites exceeding the criterion were as low as 0.0002 pound per day per acre.

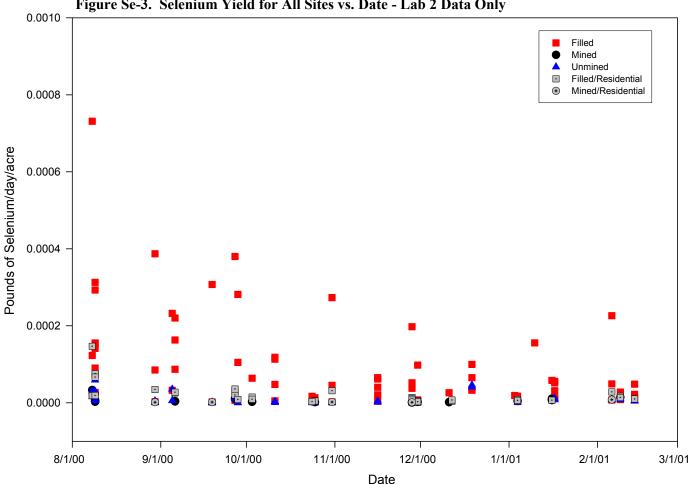


Figure Se-3. Selenium Yield for All Sites vs. Date - Lab 2 Data Only

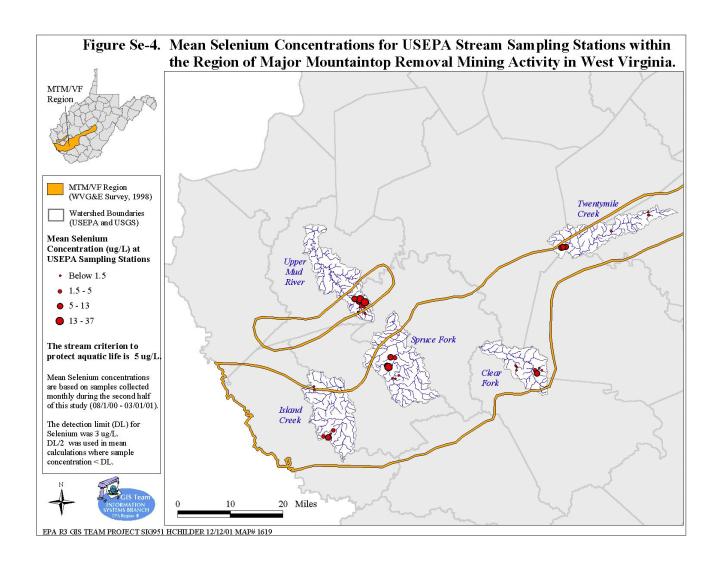
6.8.c Distribution of Sites Violating the Stream Criterion - Lab 2 Only

It was noted earlier that 66 violations of the stream criterion for selenium were identified in samples tested at the second laboratory. The period of sampling began in August 2000 and ran through February 2001. Each site was visited six times in this period and samples were collected at each site if there was flow in the stream. There were 13 sites with selenium concentrations above the criterion and all are in the Filled category. Sites MT-18, 32, 34B, 64, 98, and 103 exceeded the criterion in all six samples. Sites MT- 15, 23, 24, 57B, and 104 exceeded the criterion in five of the six samples. Sites MT-25B and 52 exceeded the criterion in two of the six samples.

The average selenium concentration for each site in the study was calculated for the last six months of the study and plotted on maps to better evaluate the distribution of the sites with high selenium. Figures Se-4 through Se-9 are maps of the study area showing the locations of the sites and the mean concentration of selenium reported by the second laboratory. Many sites had no detectable (N.D.) concentration of selenium reported by the laboratory, but that does not

necessarily mean they have zero selenium. The laboratory's detection limit (DL) for selenium was 3 ug/L. In **calculating statistics for a site**, all samples having a reported concentration of N.D. were arbitrarily assigned a value of one half the D.L. or 1.5 ug/L. If the mean selenium concentration for a site is 1.5 ug/L, then all the values were below the detection limit. This is indicated on the maps by "Below D.L."

Figure Se-4 is a map of the entire study area which plots the locations of sites with a high median value for selenium concentrations. All violations of the criterion were at Filled sites. The sites with high selenium are scattered across the entire region of mountaintop mining, but within each watershed they seem be clustered in only a portion of the study area. Maps for each watershed were prepared to show the location and average concentration of selenium at the monitoring sites.



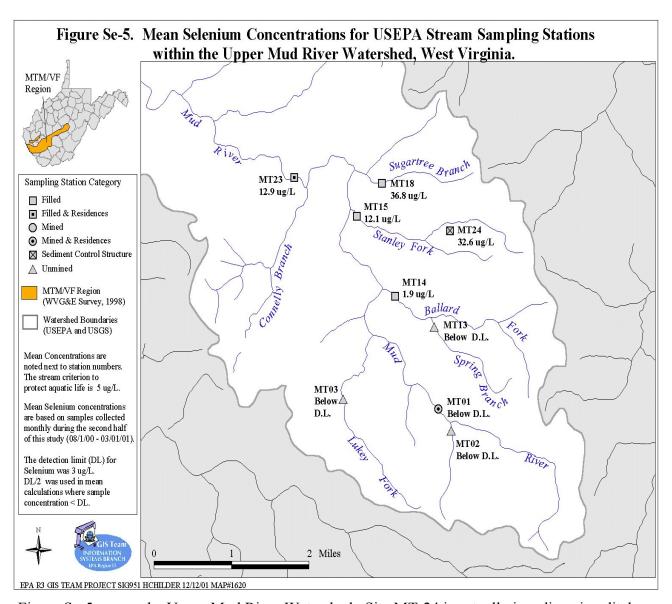


Figure Se-5 covers the Upper Mud River Watershed. Site MT-24 is actually in a diversion ditch on a reclaimed MTM/VF mine. Site information is:

| Site ID | # of Fills /Year of Permit # | Average Selenium (ug/L) | Watershed (acres) |
|---------|-------------------------------|-------------------------|-------------------|
| MT-14 | 8 / 1985, 88, 89 | 1.9 | 1,527 |
| MT-15 | 6 / 1988, 89, 91, 92, 95 | 12.1 | 1,114 |
| MT-18 | 2 / 1992, 95 | 36.8 | 479 |
| MT-23 | 26 / 1985, 88, 89, 91, 92, 95 | 5, 96 12.9 | 10,618 |
| MT-24 | 1 / 1988, 89 | 32.6 | unknown |

The level of selenium upstream other upstream sites MT-01, 02, 03, and 13 were all below the detection limit of 3 ug/L. There is a source of selenium in the upper portion of Sugartree Branch and Stanley Fork where there has been MTM/VF mining activity.

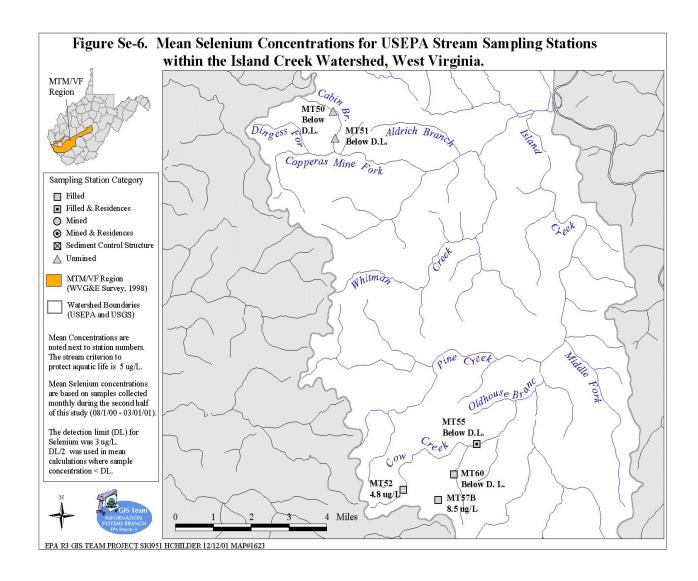


Figure Se-6 shows the average concentrations at the sites in the Island Creek watershed. In the Island Creek watershed there were two adjacent tributaries that exceeded the selenium criterion. The average value at MT-52 was 4.8 ug/L, and next door was MT-57B with an average of 8.5 ug/L. These values are near the detection limit of 3 ug/L. There was no detectable concentration of selenium downstream at MY-55 or MT-60. Dilution and the lack of additional sources of selenium could cause this. The other sites in this watershed (MT-50 & 51) had no detectable selenium. There appears to be a source of selenium in the upper portion of Cow Creek watershed where there has been MTM/VF mining activity.

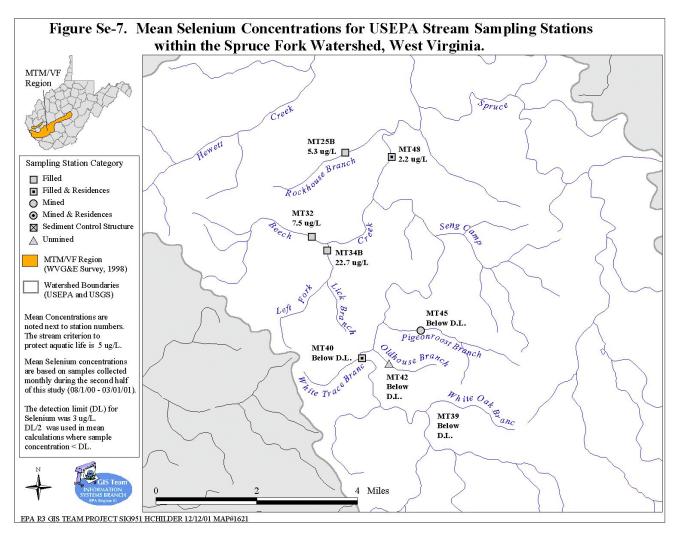


Figure Se-7 covers the sites within the Spruce Fork watershed. There were three sites on tributaries with fills in the Spruce Fork watershed that exceeded the criterion. Data on those sites is listed below:

| Site ID # | of Fills /Year of Permit # | Average Selenium (ug/L) | Watershed (acres) |
|-----------|----------------------------|-------------------------|-------------------|
| MT-25B | 1 / 1986 | 5.3 | 997 |
| MT-32 | 5 / 1986, 88, 89, 91 | 7.5 | 2,878 |
| MT-34B | - / 1985, 86 | 22.7 | 1,677 |
| MT-48 | 22 / many + 4 communitie | es 2.2 | 27,742 |

There was no detectable concentration at the four other sites to the south in this watershed (MT-39, 40, 42, 45). There is a source of selenium in the upper portion of Beech Creek above MT-32 and MT-34B and in Rockhouse Branch above MT-25B where there has been MTM/VF mining activity.

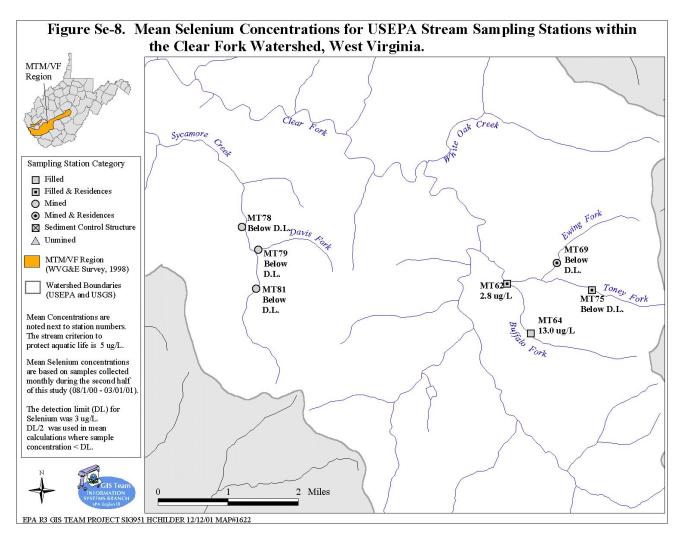


Figure Se-8 covers the sites within the Clear Fork watershed. Two sites in this watershed had measurable concentrations of selenium and data on them is listed below:

| Site ID | # of Fills /Year of Permit # | Average Selenium (ug/L) | Watershed (acres) |
|---------|------------------------------|-------------------------|-------------------|
| MT-62 | 11 / 1989, 91, 92, 93 | 2.8 | 3,193 |
| MT-64 | 5 / 1992, 93 | 13.0 | 758 |

The three other sites on Sycamore Creek (MT-78, 79, and 81) had no detectable concentration of selenium. There is a source of selenium in the upper portion of Buffalo Fork above MT-64 where there has been MTM/VF mining activity.

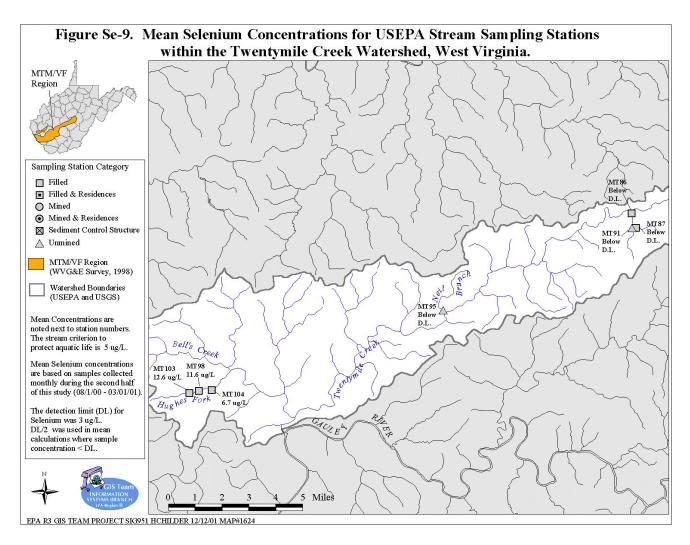


Figure Se-9 covers the sites within the Twentymile Creek watershed. The three sites in Twentymile Creek watershed that had excessive selenium are located along Hughes Fork and each one flows to the next. Data on the sites is listed below:

| Site ID | # of Fills /Year of Permit # | Average Selenium (ug/L) | Watershed (acres) |
|---------|------------------------------|-------------------------|-------------------|
| MT-98 | 8 / 1977, 82, 90 | 11.6 | 1,208 |
| MT-103 | 6 / 1977, 82, 90 | 12.6 | 1,027 |
| MT-104 | 8 / 1977, 82, 90 | 6.7 | 2,455 |

The fact that the values get lower going downstream would indicate the effects of dilution and that there are no significant additional sources of selenium in this reach of stream. All other sites in the Twentymile watershed had no detectable concentrations of selenium. There is a source of selenium in the upper portion of Hughes Fork above MT-103 where there has been MTM/VF mining activity. It would be worthwhile to further evaluate what other common attributes, in addition to MTM/VF mining, exist among these sites. Those sites are: MT-18, MT-24, MT-25B, MT-32, MT-34B, MT-52, MT-57B, MT-64, MT-103.

6.9 Total Silver - Maximum Depends on Hardness

There were 213 samples analyzed for silver at the second laboratory. None were rejected in the QA/QC review so the percent completeness is 100 %. The detection limit was 10 ug/L. The second laboratory found no detectable concentration of silver in any duplicates or blanks or stream samples. MTM/VF mining does not appear to cause increased concentrations of silver to be released to streams in the study area.

6.10 Temperature - Maximum 87°F May through November or 73°F December through April

Temperature is a field measurement. There were 474 field measurements of stream temperature in this study. None of them exceeded the maximum allowable temperatures for West Virginia streams. Continuous temperature records, especially during the hotter summer months, would have been a better indicator of temperature.

7. OTHER EVALUATIONS

7.1 Parameters with Concentrations Below Detection Limits

In addition to total beryllium, total silver, and total mercury, there were eight other parameters which were not detected in any of the samples in this study reported in data from the second laboratory.

7.1.a Hot Acidity

The second laboratory tested for hot acidity in a few samples at the start of their contract work. The Study Plan called for only acidity, not hot acidity. Acidity was analyzed for all samples in this study and that data is discussed earlier in this report. There were 22 samples analyzed for hot acidity and none was detected in any sample. This limited amount of data on hot acidity does not support any conclusions.

7.1.b Total Antimony, Arsenic, Cadmium, Chromium, Cobalt, Thallium and Vanadium

There were 213 samples analyzed for these metals and none was detected in any sample at the detection limit of 5 ug/L. None of the blanks had detectable concentrations and all of the data passed the QA/QC review. MTM/VF mining did not impact the concentration of these metals in streams in the study area.

7.2 Flow Rate Data

The flow rate was measured 466 times when the stream was sampled in this study. There is a flow rate to go with 97.3% of the samples. Most flow rates were measured using standard stream gaging procedures and calculations. There has been considerable discussion and speculation regarding the impacts of MTM/VF mining on stream flows.

MTM/VF mining can affect runoff. Rain falling on a watershed either runs off in the stream or infiltrates into the ground. If it infiltrates, it either percolates through the rocks and eventually comes out of a spring that feeds a surface stream, or it is taken up by plants and stored or evaporated back into the atmosphere. Many aspects of MTM/VF mining activities can affect stream flow including: removing the trees and other plants; fracturing rocks; moving soil and rocks; constructing flow diversion channels and sedimentation ponds; constructing haul roads; reshaping and compacting mine spoil; constructing valley fills; and reestablishing vegetation on the mined area. MTM/VF activities can increase the base flows of streams while decreasing the peak flows of floods by temporarily storing the rainfall in ponds or in the increased voids in the spoil of mined areas. The Kentucky Geological Survey report *Hydrogeology*, *Hydrogeochemistry*, and Spoil Settlement at a Large Mine-Spoil Area in Eastern Kentucky: Star Fire Tract notes:

Field investigations have identified numerous ground-water recharge and discharge zones at the mine spoil area. Recharge occurs by way of disappearing streams, ground-water infiltration along exposed boulder zones, and at areas where spoil is in contact with bedrock highwalls. Minor recharge occurs locally on the spoil's surface through macropores (snakeholes). Discharge of ground-water from the spoil occurs mainly through springs and seeps at the outslope of the spoil body. Ground-water movement within the spoil is controlled by the ground-water gradients within the spoil, which are a function of the buried topography and interaction of the recharge and discharge zones of low-permeability spoil. The spoil interior, lacking any major direct recharge from the surface, slowly accumulates water, whereas in the valley fills ground water moves at a rapid rate. Recharge to the valley fills comes from streams, adjacent bedrock aquifers, and from surface water that seeps in near the bedrock-spoil interface. (Wunsch 1996, page 25)

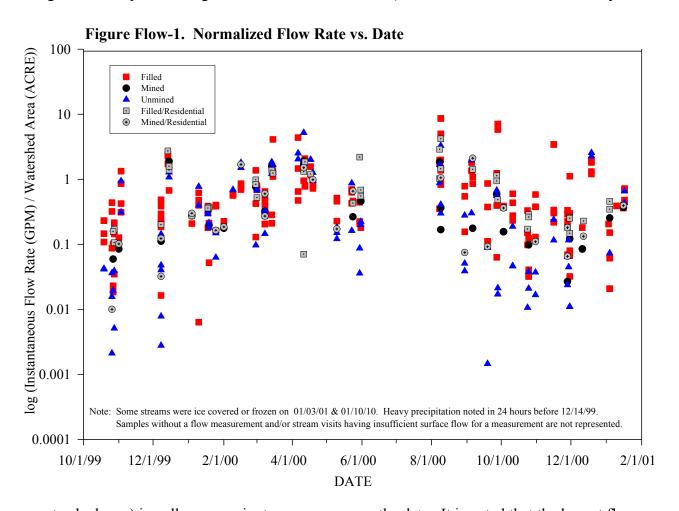
The impact of fills on base flow in streams has been investigated by several researchers. The USGS Water- Resources Investigations Report 01-4092, *Reconnaissance of Stream Geomorphology, Low Streamflow, and Mountaintop Coal-Mining Region, Southern West Virginia, 1999-2000* notes:

... the valley-fill sites can have about a 6-7 times greater 90-percent flow duration than unmined sites. (Wiley et al 2001, page 13)

The 90-percent flow duration is the flow that is exceeded 90 % of the time. The report indicates

that base flows of streams with valley fills are 6 to 7 times greater than the base flows of unmined areas. Stream water quality below MTM/VF mines is also altered in base flow periods when the mineralized ground-water from the mined area becomes the major portion of the stream flow.

Figure Flow-1 plots the log of the normalized flow rate (the instantaneous flow divided by the

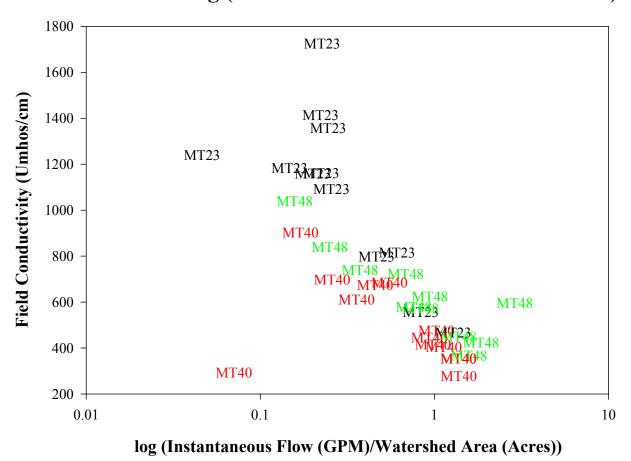


watershed area) in gallons per minute per acre versus the date. It is noted that the lowest flows are often at Unmined sites. There is a broad range of normalized flow rates for this study area and some variation with the seasons is also evident. There does not appear to be any period of extremely low flow.

Cumulative impacts of MTM/VF mining are difficult to measure but the cumulative impacts on flow rate should be measurable. When the base flows of streams are increased by MTM/VF mining, the base flows of larger streams are also increased. Since the base flows from MTM/VF sites are higher in dissolved minerals, the conductivity of larger streams should increase as low flows occur. Figure Flow-2 plots the conductivity of samples for the three largest watersheds in this study (MT-23 the Mud River near Mud, MT-40 Spruce Fork near Blair, and MT-48 Spruce Fork near Dobra) vs the log of the normalized flow. The pattern of lower flows being associated

Figure Flow-2. Field Conductivity vs.

Log (Instantaneous Flow / Watershed Area)



with higher conductivity is evident.

The flow rate data for each sampling event is part of the electronic data base of this report. While outside the scope of this report, there would be value in having experts evaluate the flow rate data comparing it with references and nearby long term stream flow records to identify impacts attributable to mining.

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ATTACHMENT 1

CHEMICAL PARAMETERS IN WEST VIRGINIA WATER QUALITY CRITERIA

Chemical Parameters Selected From West Virginia Water Quality Criteria

The chemical parameter, the water quality limit, and the type of limit are listed in italics. Any comments on the monitoring of each parameter are included in plain type.

Aluminum

Not to exceed 750 ug/L

Acute limits for cold and warm water streams

Total aluminum and dissolved aluminum were monitored in this study.

Ammonia

Limit determined using the tables and formulae in the national Criteria section of USEPA's Ambient Water Quality Criteria for Ammonia 1984 (EPA 440/5-85-001)

Acute and chronic limits for cold and warm water streams

Ammonia is not thought to be a normal contaminant from coal mining activities and was not monitored in this study.

<u>Dissolved Trivalent Arsenic</u>

Not to exceed 360 ug/L (Acute) nor 190 ug/L (Chronic)

Acute and chronic limits for cold and warm water streams.

Arsenic in trivalent form is not thought to be a normal contaminant from coal mining activities. This study monitored for total arsenic concentrations which would include the dissolved trivalent form. This study's grab sample results can be compared to the limit for dissolved trivalent arsenic to indicate the need for expanded monitoring in the future. If the total arsenic values are less than the limit for dissolved trivalent arsenic, no further studies are recommended. If however the total arsenic values are greater than the limit for dissolved trivalent arsenic, then further study might be recommended.

Beryllium

Not to exceed 130 ug/L

Acute limit for cold and warm water streams

Beryllium was monitored during this study.

Dissolved Cadmium

The one-hour average concentration shall not exceed the value determined by the following equation:

 $Cd \ (ug/L) = e^{\ [\{1.128\}\ x\ \{ln\ hardness\}\ -\ 3.828]}\ x\ [1.101672\ -\ \{(ln\ hardness)\ x\ (0.041838)\}]$

Chronic limit for warm and cold water streams (acute limit is higher) -

Only total cadmium concentrations were monitored in the grab samples from the streams. This study's grab sample results can be compared to the one-hour average dissolved cadmium limit to indicate the need for expanded monitoring in the future.

Chloride

Not to exceed 860 mg/L (Acute) nor 230 mg/L (Chronic)

Warm and cold water streams

The 230 mg/L limit was used for this study.

Dissolved Copper

The one-hour average concentration shall not exceed the value determined by the following equation:

Cu (ug/L) =
$$e^{[0.9422 \{ln \text{ hardness}\} - 1.464]} \times 0.960$$

Acute limit for warm and cold water streams.

Only total copper concentrations were monitored in the grab samples from the streams. This study's grab sample results can be compared to the one-hour average dissolved copper limit to evaluate the need for expanded monitoring in the future.

<u>Cyanide</u> (as Free Cyanide $HCN = CN^{-1}$)

Not to exceed 22ug/L (Acute) nor 5 ug/L(Chronic)

Limits for both warm and cold water streams.

Cyanide is not thought to be a normal contaminant from coal mining activities and was not monitored in this study.

Dissolved Oxygen

Not less than 5 mg/L at any time

Limit for warm water stream.

Field crews monitored for dissolved oxygen during this study.

Dissolved Hexavalent Chromium

Not to exceed 15.3 ug/L(Acute) nor 6.93 ug/L (Chronic)

There are different limits for warm or cold water streams.

Dissolved hexavalent chromium is not thought to be a normal contaminant from coal mining activities. Total chromium was monitored in this study. Total chromium results can be compared to these limits for dissolved hexavalent chromium to evaluate the need for expanded monitoring in the future.

<u>Iron</u>

Not to exceed 1.5 mg/L

Chronic limit for warm and cold water streams.

Total iron was monitored in this study as well as dissolved iron.

Dissolved Lead

The one-hour average concentration shall not exceed the value determined by the following equation:

Pb (ug/L) =
$$e^{[1.273\{\ln \text{hardness}\} - 1.46]} \times [1.46203 - \{(\ln \text{hardness})(0.145712)\}]$$

Acute limit for warm and cold water streams

Only total lead concentrations were monitored in this study. This study's grab sample results can be compared to the one-hour average dissolved lead limit to evaluate the need for expanded monitoring in the future.

Total Mercury

Not to exceed 2.4 ug/L

Acute limit for warm and cold water streams

Total mercury was monitored in this study.

<u>Methylmercury</u> (water column)

Not to exceed 0.012 ug/L

Chronic limit for warm and cold water streams

Only Total Mercury concentrations were monitored in this study.

Dissolved Nickel

The one-hour average concentration shall not exceed the value determined by the following equation:

```
Ni = e^{[0.846 \{ln \text{ hardness}\} + 3.361]} x [0.997]
```

Chronic limit for both warm and cold water streams

Only total nickel concentrations were monitored in this study. This study's grab sample results can be compared to the one-hour average dissolved nickel limit to evaluate the need for expanded monitoring in the future.

Nitrite (as Nitrite-N)

Not to exceed 1.0 mg/L (warm water stream) nor 0.60 mg/L (cold water stream)

The extremely short holding time for Nitrite analyses forced us to monitor for Nitrate + Nitrite. The Nitrite limit can be compared to the values for Nitrate + Nitrite only for an indication of which sites may possibly have Nitrite contamination.

Organics

Limits for chronic exposure in warm and cold water streams are -

Chlordane - 4.3 ng/L
DDT - 1.0 ng/L
Dieldrin - 1.9 ng/L
Endrin - 2.3 ng/L
Toxaphene - 0.2 ng/L
PCB - 14.0 ng/L
Methoxychlor - 0.03 ug/L

None of these Organics are thought to be a normal contaminant from coal mining activities. They were not included in the list of parameters to be monitored.

рН

No values below 6.0 nor above 9.0 (higher values tolerated if due to photosynthetic activity).

Limits for acute and chronic warm and cold water streams Field crews monitored for pH during this study.

Phenol

Not to exceed 10,200 ug/L (acute) nor 2,560 ug/L (chronic)

Limits for warm and cold water streams

Phenol is not thought to be a normal contaminant of concern from coal mining activities and was not monitored in this study.

Radioactivity

Gross Beta activity not to exceed 1000 picocuries per liter, etc.....

Limits for both warm and cold water streams

Radioactivity is not thought to be a normal contaminant of concern from coal mining activities and was not monitored in this study.

Selenium

Not to exceed 20 ug/L (acute) nor 5 ug/L (chronic)

Limits for warm and cold water streams

The 5 ug/L limit was used for this study.

Silver

The limit varies from 1 ug/L to 43 ug/L depending on the hardness which varies from 0 mg/L to 600 mg/L and whether it is a cold water or warm water stream.

Chronic limits for warm and cold water streams.

Total silver was monitored in this study.

Dissolved Silver

The one-hour average concentration shall not exceed the value determined by the following equation:

$$Ag = e^{[1.72\{\ln \text{ hardness}\} - 6.52]} \times 0.85$$

Acute limit for warm and cold water streams -

Only total silver concentrations were monitored in this study.

Temperature

..... not to exceed 87° Fahrenheit during May through November nor 73° Fahrenheit during December through April etc.....

Acute limits for warm water streams

Field crews monitored for temperature in this study.

Threshold Odor

Not to exceed a threshold odor number of 8 at 104° Fahrenheit as a daily average

Chronic limit for warm and cold water streams

Threshold Odor is not thought to be a normal contaminant from coal mining and was not monitored in this study.

Total Residual Chlorine

Not to exceed 19 mg/L (acute) nor11 ug/L

Warm water stream limits only - No chlorinated discharge allowed in cold water streams (chronic). Total Residual Chlorine is normally a parameter of concern only at sewage treatment facilities, water treatment plants, chemical plants or swimming pool discharges. It was not monitored in this study.

Turbidity

No discharge shall contribute to a net load of suspended matter such that the turbidity exceeds 10 NTU's over background turbidity when the background is 50 NTU or less, or have more than a 10% increase in turbidity (plus 10 NTU minimum) when the background turbidity is more than 50 NTUs

Chronic limit for warm and cold water streams -

Some of the field meters used in this study had the capability to monitor turbidity. The intermittent readings taken by some of the crews are not included in the results of the study. The limits also require upstream and downstream monitoring which was not part of the study plan.

Dissolved Zinc

The one-hour average concentration shall not exceed the value determined by the following equation:

$$Zn = \left[e^{\;\{(0.8743)\;x\;(ln\;hardness)\,+\,0.8604\}} \right] \;x\; \left[0.978 \right]$$

Acute limit for warm and cold water streams (chronic limit is higher)-

Only total zinc concentrations were monitored in this study. This study's grab sample results can be compared to the one-hour average dissolved zinc limit to evaluate the need for expanded monitoring in the future.

ATTACHMENT 2

FIELD SHEETS FOR WATER SAMPLING AND FLOW MEASUREMENT

FIELD SHEET - WATER SAMPLING

| STATION NUMBER | LOCATION | |
|---|---|---|
| DATE mm/dd/yy // | LOCATIONTIME (military) | hours |
| INVESTIGATOR | | |
| AGENCY | | |
| FIELD READINGS: Meter 1 | Make & ID: | |
| | (C) Dissolved Oxygen (mg/L) | |
| Conductivity (umhos/cm) | (C) Dissolved Oxygen (ing/L) | • |
| Conductivity (umhos/cm) In the conductivity (umhos/cm) | — nitials: | |
| pH Calibration (4.0) (7.0) | $(10.0) \qquad (Enter pH red)$ | eadings) |
| Conductivity Calibration (Cond | c. of Std. KCl), Reading: | umhos/cm |
| DO Calibration (Temp.) | | [Meters are Auto Altitude] |
| NIST Thermometer: Refere | nce Temperature (0° C - Ice/Water | in ice chest) Reading: |
| | nce Temperature (Ambient Air Ter | |
| | ence Temperature (0 °C - Ice/Wate | |
| | erence Temperature (Ambient Air | |
| FLOW RATE (Meter Make & | | |
| gauging sheet attached | | |
| measured with bucket & sto | pwatch @(volume) per | (seconds) =liters/sec |
| other method - describe | | |
| SAMPLE CONTAINERS F | TLLED AT THIS SITE ("* " Col | lect Field Duplicate, Mark spaces "x" as |
| Collected) | | |
| | | Sulfate, Chloride, Acidity, Alkalinity. |
| | ic) preserved with sulfuric acid to p | oH<2 for Total |
| phosphorous,(NO2+NO3) | | |
| | preserved with sulfuric acid to pH | |
| | filtered, preserved with sulfuric a | cid to pH <2 for Dissolved Organic |
| Carbon. | | |
| | ic) preserved with nitric acid to pH | |
| | ic), filtered preserved with nitric ac | |
| | c) preserved with nitric acid to pH | <2 for dissolved metals (Filter Blank, |
| 1/day per crew). | | |
| |) preserved with sulfuric acid to ph | I <2 for Dissolved Organic Carbon |
| (Filter Blank, 1/day/crew). | | |
| FIELD FILTRATION | | |
| | | am. A new disposable 0.45 micron filte |
| | - | nto the sample container for shipment to |
| | _ | ble site. The field filtering will comply |
| | | r blanks will be prepared with lab pure |
| | iges, dispensed through the fifter in | nto the container, and acidified (acid |
| listed above). | | |
| Chain of Custody: | | |
| • | Date (dd/mm/yy) T | Cime (military) Hours |
| | | seal them for shipment to the lab. |

| Lab Representative Signature | | Received the above listed samples into the | | |
|---------------------------------------|----------------|---|----------|--|
| Laboratory custody on Date (mm/dd/yy) | | Received the above listed samples into the Time (military) Hours. | | |
| FIELD SHEET - FLOW MEASUREMENT | | | | |
| | | | | |
| STATION NUMBER | LOCAT | TON | | |
| DATE mm/dd/vv $-$ | / / TIME (| TION(military) | hours | |
| INVESTIGATOR(S) | | | | |
| AGENCY | | | | |
| | | | | |
| | T_ , , | <u> </u> | | |
| Distance From Bank | Depth of Water | Depth of Reading | Velocity | |
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OBSERVATIONS: (over if required)

ATTACHMENT 3

INFORMATION ON PARAMETERS MONITORED

| Information on Parameters Monitored | | | | |
|-------------------------------------|---|---|--|--|
| Parameter | Method * | "Frequency of Collection | Sample Preservation/Holding Time (ice to < 4C,acid to pH<2) | Method Detection Limits** (ug/l) |
| Flow Rate | USGS stream gaging protocol modified to use electromagnetic velocity meter | On each sampling occasion at all 37 sites | not applicable | not applicable |
| Temperature (°C), | EPA 170.1 {Hydrolab type multiparameter field meter, in situ. See Section D.] | On each sampling occasion at all 37 sites | not applicable, in situ | not applicable |
| Dissolved Oxygen*** (mg/l), | EPA 170.1 [Hydrolab type multiparameter field meter, in situ. See Section D.] EPA 360.1 [in situ] | On each sampling occasion at all 37 sites | not applicable, in situ | not applicable (Capable of ± 0.2 mg/L*) |
| pH*** (su), | [Hydrolab type multiparameter field meter, in situ. See Section D.] EPA 150.1 [in situ] | On each sampling occasion at all 37 sites | not applicable, in situ | not applicable (Capable of measuring +/- 0.2 SU*) |
| Conductivity (umhos/cm) | [Hydrolab type multiparameter field meter, in situ. See Section D.] EPA 120.1 [in situ] | On each sampling occasion at all 37 sites | not applicable, in situ | not applicable |
| Total Suspended Solids | EPA 160.2 | Monthly | Ice/7 days | 5000 |
| Total Dissolved Solids | EPA 160.1 | Monthly | Ice/7 days | 5000 |
| Acidity | EPA 305.1 | Monthly | Ice/14 days | 2000 |
| Alkalinity | EPA 310.1 | Monthly | Ice/14 days | 4000 |
| Sulfate | EPA 375.4 | Monthly | Ice/28 days | 10000 |
| Nitrate+Nitrite | EPA 300.0 Unless acid preservative interferes | Monthly | Ice/H ₂ SO ₄ /28 Days | 100 |
| Total Phosphorous | EPA 365.4 | Monthly | Ice/H ₂ SO ₄ /28 Days | 10 |
| Total Organic Carbon | EPA 415.1 | Monthly | Ice/H ₂ SO ₄ /28 Days | 1000 |
| Dissolved Organic Carbon | EPA 415.1 | Monthly | Field filtered (see Appendix A) Ice/H ₂ SO ₄ /28 Days | 1000 |

| Information on Parameters Monitored | | | | |
|-------------------------------------|--|-----------------------------|--|---|
| Parameter | Method * | "Frequency of Collection | Sample Preservation/Holding Time (ice to < 4C,acid to pH<2) | Method Detection Limits** (ug/l) |
| Dissolved Metals Al, Fe, Mn | EPA 200.7 | Monthly | Field filtered (see Appendix A) Ice/HNO ₃ /6 months | 100 |
| Chloride*** | EPA 300.0 | Monthly | Ice/28 days | 80000 |
| Total K, Na | EPA 258.1, 273.1 | Monthly | Ice/HNO ₃ /6 months | 1000 |
| Total Al***, | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 250 |
| Ca, Mg, Mn | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 100 |
| Hardness | EPA 200.7 (Calculated from Ca + Mg) 2340B APHA | Monthly | Ice/HNO ₃ /6 months | Not Applicable |
| Total, Cr, Zn | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 10 |
| Total Ag | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 10 |
| Total Cu | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 10 |
| Total Fe*** | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 500 |
| Total Ni | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 10 |
| Total Be*** | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 40 |
| Total As | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 5 |
| Total Cd | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 5 |
| Total Pb | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 5 |
| Total Se*** | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 2 |
| Total Sb | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 5 |
| Total Tl | EPA 200.7 | Monthly | Ice/HNO ₃ /6 months | 5 |
| Total Hg*** | EPA 245.1 | Monthly | Ice/HNO ₃ /6 months | 0.8 |

^{*}Other equivalent 40CFR Part 136 Methods may be substituted in order to meet the needed Method Detection Limits listed.

^{**}The method detection limits listed are not critical if ambient levels are routinely measured at significantly higher levels. If the detection levels listed for WVWQSC analytes can not be achieved and the routine ambient levels are not detectable, the Project Officer must be notified.

^{***} Denotes parameter with applicable West Virginia Water Quality Stream Criteria (WVWQSC) for aquatic life.

ATTACHMENT 4

ELECTRONIC SPREADSHEET OF THE RESULTS OF THE STUDY