



EPA Region 7 TMDL Review

TMDL ID 302 **Water Body ID** MoWBID 0737
Water Body Name Cedar Creek
Pollutant Sulfate
Tributary
State MO **HUC** 10300102-190001
Basin Lower Missouri-Moreau
Submittal Date 6/18/2004
Approved yes

Submittal Letter

State submittal letter indicates final TMDL(s) for specific pollutant(s)/ water(s) were adopted by the state, and submitted to EPA for approval under section 303(d) of the Clean Water Act.

Received on June 18, 2004; submitted as a final TMDL document which also includes a second TMDL for Manacle Creek for pH and sulfate, under a cover letter dated June 16, 2004.

Water Quality Standards Attainment

The water body's loading capacity for the applicable pollutant is identified and the rationale for the method used to establish the cause-and-effect relationship between the numeric target and the identified pollutant sources is described. TMDL and associated allocations are set at levels adequate to result in attainment of applicable water quality standards.

Sulfate and chloride criteria for the protection of aquatic life are linked in Missouri's Water Quality Standards (WQS) where it's stated the in-stream concentration of chloride plus sulfate in each creek will not exceed 1000 mg/L; the beneficial use is the protection of aquatic life. Allocations are set with a 4% margin of safety, thereby setting the in-stream target lower than the WQS criterion for the pollutants, which will result in attainment of the applicable beneficial uses.

Numeric Target(s)

Submittal describes applicable water quality standards, including beneficial uses, applicable numeric and/or narrative criteria. If the TMDL is based on a target other than a numeric water quality criterion, then a numeric expression, site specific if possible, was developed from a narrative criterion and a description of the process used to derive the target is included in the submittal.

The beneficial uses of Cedar Creek are described, and the water quality standards for those beneficial uses are described. The targets are taken directly from the water quality criteria in Missouri's water quality standards.

Link Between Numeric Target(s) and Pollutant(s) of concern

An explanation and analytical basis for expressing the TMDL through surrogate measures (e.g., parameters such as percent fines and turbidity for sediment impairments, or chlorophyll-a and phosphorus loadings for excess algae) is provided, if applicable. For each identified pollutant, the submittal describes analytical basis for conclusions, allocations and margin of safety that do not exceed the load capacity.

The numeric targets are the water quality criteria for sulfate/chloride. The relationship between the numeric targets and the pollutant is direct.

Source Analysis

Important assumptions made in developing the TMDL, such as assumed distribution of land use in the watershed, population characteristics, wildlife resources, and other relevant information affecting the characterization of the pollutant of concern and its allocation to sources, are described. Point, non point and background sources of pollutants of concern are described, including magnitude and location of the sources. Submittal demonstrates all significant sources have been considered.

The sources of sulfate are described. The major contribution was determined to be abandoned coal mine drainage. The submittal demonstrates that all significant sources of sulfate were identified and considered.

Allocation

Submittal identifies appropriate wasteload allocations for point, and load allocations for nonpoint sources. If no point sources are present the wasteload allocation is zero. If no nonpoint sources are present, the load allocation is zero.

The load capacity is identified as the sulfate plus chloride criterion, the MOS is explicitly set at 4% of that concentration, thereby setting the allocation targets lower than the WQS criterion.

WLA Comment

The waste load allocation is zero.

LA Comment

The load allocation is 960 mg/L sulfate plus chloride under all flow conditions.

Margin of Safety

Submittal describes explicit and/or implicit margin of safety for each pollutant. If the MOS is implicit, the conservative assumptions in the analysis for the MOS are described. If the MOS is explicit, the loadings set aside for the MOS are identified and a rationale for selecting the value for the MOS is provided.

The margin of safety is 4% of the sulfate plus chloride criterion of 1000 mg/L. This explicit MOS is based on the mean chloride concentrations found in Cedar Creek and Manacle Creek (flows directly into Cedar Creek) and best professional judgement regarding the uncertainty in the knowledge of the link between the allocation and the water quality in Cedar Creek.

Seasonal Variation and Critical Conditions

Submittal describes the method for accounting for seasonal variation and critical conditions in the TMDL(s).

Seasonal variation was considered, and critical conditions were identified. Since the water quality standards for sulfate do not distinguish between seasons, the allocations apply year round.

Public Participation

Submittal describes public notice and public comment opportunity, and explains how the public comments were considered in the final TMDL(s).

This TMDL was placed on public notice from April 23 to May 23, 2004; two comments were received and addressed.

Monitoring Plan for TMDL(s) Under Phased Approach

The TMDL identifies the monitoring plan that describes the additional data to be collected to determine if the load reductions required by the TMDL lead to attainment of WQS, and a schedule for considering revisions to the TMDL(s) (where phased approach is used).

Cedar Creek is included in MDNR's continuous monitoring plan and is sampled twice per year.

Reasonable assurance

Reasonable assurance only applies when reduction in nonpoint source loading is required to meet the prescribed waste load allocations.

Not required.
