Restoration Plan for Qualified Hydrologic Unit Determination Surface Mining Control and Reclamation Act Amendments of 2006

Hydrologic Unit: Catawissa Creek

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 NY = PA = MD = USA

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DESCRIPTION OF WATERSHED

 The area covered by this Restoration Plan for Qualified Hydrologic Unit Plan (QHUP) Development consists of the Catawissa Creek Watershed impacted by Abandoned Mine Drainage (AMD). This includes the entire mainstem of Catawissa Creek that is listed as AMD-Impaired (41.48 stream miles), and all the tributaries entering this stretch, including the AMD-Impaired major tributary of Tomhicken Creek. The portion of the Catawissa Creek Watershed requested for qualification is 153 square miles in size and encompasses 193.4 stream miles.

 Catawissa Creek Watershed is located in the Eastern Middle Anthracite Coal Field. From its confluence with the Susquehanna River to Rattling Run, Catawissa Creek is classified as a Trout Stocked Fishery (TSF) in Chapter 93 of the Pennsylvania Code. From Rattling Run to its source, Catawissa Creek is classified as a Cold Water Fishery (CWF) and many of its tributaries are classified as High Quality (HQ) streams. These tributaries have documented natural trout reproduction, with several classified as Class A Wild Trout (WT). Once restored, the Pennsylvania Fish and Boat Commission (PFBC) plans to manage 18 miles of Catawissa Creek as a TSF and an additional 23.5 miles as a WT fishery.

 The primary sources of AMD impairment to Catawissa Creek are from five drainage-tunnel outfalls. Two of those, Oneida #1 and #3, impact the Tomhicken Creek tributary and have been treated successfully by the Catawissa Creek Restoration Association (CCRA). Sections of Tomhicken Creek have recently been removed from PA's Integrated List of Impaired Waters (2018) due to water quality and biological improvement after treatment.

 Three other drainage-tunnel outfalls remain untreated and enter Catawissa Creek very close to one another near the headwaters in East Union Township, Schuylkill County (Figure 1). The first outfall is the relatively small Catawissa Tunnel which does not significantly impair Catawissa Creek. As will be discussed later, a native brook trout population exists in Catawissa Creek downstream of the Catawissa Tunnel.

 The second outfall, the Audenried Tunnel, has the largest AMD impact to Catawissa Creek and is the eighth largest flow discharge $(\sim 24$ cubic feet per second (cfs) average) in the entire Susquehanna River Anthracite Field. Upon its entry, the fish assemblage of Catawissa Creek is eradicated and does not return to any significance until the entry of Tomhicken Creek, about 15 miles downstream.

 The third outfall, the Green Mountain Tunnel, enters about one-third of a mile downstream of Audenried. Even though of relatively significant flow (~4.5 cfs average), the concentration and loading of AMD parameters are inconsequential due to the extreme loading of Audenried (Table 1).

 As this restoration plan will show, treatment of the Audenried Tunnel is the only project required that would restore the entire length of the Catawissa Creek mainstem to its confluence with the Susquehanna River, potentially removing nearly 45 stream miles from the Integrated List of Impaired Waters (2018). In addition, due to the high quality of tributaries entering Catawissa, many of which are classified as HQ and/or Class A, Catawissa Creek has the potential of being a regional large-river, cold-water fishery destination similar to Penns Creek or Little Juniata River.

Figure 1. Map of the AMD-Impacted Streams and AMD Discharge Locations on Catawissa Creek in East Union Township, Schuylkill County

HISTORICAL STUDIES AND RESTORATION PLANS

 Although not all are comprehensive relative to the entire watershed and all mine discharges therein, historical studies and restoration plans included:

- United States Environmental Protection Agency (USEPA) *Catawissa Creek Mine Drainage Abatement Project* (1977)
- GEO-Technical Services *Design Criteria and a Conceptual Plan for the Abatement of AMD Discharges from Five Water Level Tunnels* (1982)
- PFBC *Catawissa Creek Fisheries Management Report* (1997)

 Though dated with recommendations and plans that are inconsistent with current water quality and watershed restoration needs, only water quantity data were utilized from these older studies. Studies completed after 2003 were fully investigated for not only available water quality and quantity data, but also for recommendations and plans for the restoration of Catawissa Creek from AMD impacts. Those three studies included:

1) Pennsylvania Department of Environmental Protection (PADEP) – *Catawissa Creek Watershed Total Maximum Daily Load (TMDL)* (2003)

 The Catawissa Creek TMDL calculated the amount of load reductions needed at several stations along Catawissa Creek, including Audenried and Green Mountain Tunnels, to meet water quality standards (Table 2). The calculations demonstrate that in 2003, acidity and aluminum (Al) concentrations were the main water quality issues within Catawissa Creek, and that Audenried and Green Mountain Tunnels were responsible for the majority of this loading.

 Downstream of Tomhicken Creek, there are no more AMD inputs to Catawissa Creek. As will be discussed later, Tomhicken Creek is now a source of beneficial water quality to Catawissa Creek due to the treatment of Oneida #1 and #3, although this historically was not the case.

 The headwaters of Catawissa are impacted from historical mines. Surface water is lost underground through the broken strata. However, as will be shown later, the headwaters of Catawissa Creek are not nearly as contaminated as Catawissa Creek below the Audenried and Green Mountain Tunnels.

| Station | Parameter | | Measured Sample Data | | Allowable | Reduction | | |
|-----------------|---------------------------------|--------------------------------|--------------------------------|-------|--------------------------|------------------|--|--|
| | | mg/l | lbs/day | mg/l | lbs/day | $\frac{0}{0}$ | | |
| CC1 | Headwaters of Catawissa Creek | | | | | | | |
| | Fe | 0.34 | | 0.34 | $\overline{}$ | $\boldsymbol{0}$ | | |
| | Mn | 1.74 | | 0.001 | | 99.9 | | |
| | A1 | 3.2 | $\overline{}$ | 0.38 | $\overline{}$ | 88 | | |
| | Acid | 34.5 | | 0.03 | - | 99.9 | | |
| Audenried | Audenried Tunnel Outfall | | | | | | | |
| | Fe | 0.7 | 71.3 | 0.56 | 57.1 | 21 | | |
| | Mn | 2.28 | 232.4 | 0.61 | 62.2 | 73 | | |
| | A ₁ | 7.93 | 808.2 | 0.4 | 40.8 | 95 | | |
| | Acid | 68.08 | 6938.4 | 0.68 | 69.3 | 99 | | |
| GMT | Green Mountain Tunnel Outfall | | | | | | | |
| | Fe | 0.44 | 5.3 | 0.23 | 2.8 | 49 | | |
| | Mn | 0.64 | 7.7 | 0.62 | 7.4 | 3 | | |
| | AI | 2.97 | 35.7 | 0.33 | $\overline{4}$ | 89 | | |
| | Acid | 28.06 | 337 | 2.25 | 27 | 92 | | |
| CC6 | | Catawissa at Girard Manor Road | | | | | | |
| | Fe | 0.25 | 46.8 | 0.25 | 46.8 | $\boldsymbol{0}$ | | |
| | Mn | 1.05 | 196.5 | 0.4 | 74.9 | $\overline{0}$ | | |
| | A ₁ | 3.62 | 677.5 | 0.29 | 54.3 | $\overline{0}$ | | |
| | Acid | 33.26 | 6224.6 | 0.1 | 18.7 | $\overline{0}$ | | |
| CC ₉ | Catawissa DS of Tomhicken Creek | | | | | | | |
| | Fe | 0.1 | 48.8 | 0.1 | 46.8 | $\boldsymbol{0}$ | | |
| | Mn | 0.53 | 258.7 | 0.4 | 195.5 | $\boldsymbol{0}$ | | |
| | A ₁ | 1.3 | 634.5 | 0.27 | 131.8 | $\overline{0}$ | | |
| | Acid | 23.88 | 11654.8 | 0.24 | 117.1 | 96 | | |

Table 2. Catawissa Creek Pollution Loading Reduction Targets

2) The Catawissa Creek Restoration Association (CCRA) and the Eastern PA Coalition for Abandoned Mine Reclamation (EPCAMR) – *Catawissa Creek Watershed Implementation Plan* (2004)

 CCRA, with the help of PADEP's 319 Program and EPCAMR, developed the Catawissa Creek Watershed Implementation Plan to address the TMDL. This document explains the various pollution sources, what projects need to be completed to meet pollutant load reductions required by the TMDL, and the estimated cost to restore Catawissa Creek.

 In 2005, as a result of the implementation plan, CCRA constructed a passive treatment system for the Audenried Tunnel. The system consists of three limestone filled upflow style tanks and settling ponds and was originally designed to treat about 18 cfs. An underdrain intake system collects the polluted mine water from the discharge channel,

diverts it, and splits the flow into the three tanks. Additionally, a bypass intake system and micro-hydro turbines were installed on the outflow of the tanks to generate electricity and to help flush the tanks on a regular basis to limit aluminum sludge buildup in the limestone.

3) Pennsylvania Environmental Council (PEC) – *Catawissa Creek Watershed Rivers Conservation Plan* (2010)

 This study does not focus significantly on the AMD water quality issues of Catawissa Creek.

LOCAL SUPPORT

 CCRA is a very active volunteer watershed organization that works to preserve and improve water quality within the Catawissa Creek Watershed. Since its inception in 1998, CCRA has been involved in monitoring and water quality improvement projects in the watershed.

In 2001, CCRA helped bring a passive treatment system online for Oneida #1 that neutralizes the AMD discharging into Sugarloaf Creek, a tributary of Tomhicken Creek.

 As a result of the Catawissa Creek Implementation Plan, CCRA constructed a passive treatment system for the Audenried Tunnel in 2005. The system consists of three limestone-filled upflow style tanks and settling ponds and was originally designed to treat about 18 cfs. An under drain intake system collects the polluted mine water from the discharge channel, diverts it, and splits the flow into the three tanks. Later, a bypass intake system and micro-hydro turbines were installed on the outflow of the tanks to generate electricity and to help flush the tanks on a regular basis to limit aluminum sludge buildup in the limestone. Unfortunately, that system was taken offline after high flow damage from Tropical Storm Lee in 2011.

 In 2009, CCRA helped to complete a third treatment system to treat the water from Oneida #3 that discharges into Tomhicken Creek, the largest tributary to Catawissa Creek. Oneida #1 and #3 treatment systems have restored sections of Tomhicken Creek, which is now a source of clean alkaline water that helps dilute the AMD loading within Catawissa Creek.

 CCRA continues its efforts to restore Catawissa Creek and is a partner in this effort for restoration plan qualification and the use of Surface Mine Control and Reclamation Act funds to construct an active treatment plant (ATP) to finally treat the Audenried Tunnel in total, which will restore the entire mainstem of Catawissa Creek to its confluence with the Susquehanna River. As mentioned, Catawissa Creek has the potential of becoming a large-river, regional cold water fishery destination due to HQ-CWF/Class A fisheries found on many of its tributaries.

 CCRA lists the following organizations/agencies on their website (http://thecatty.org/) as partners: Columbia County Conservation District, Schuylkill County Conservation District, PA Department of Conservation and Natural Resources, USEPA, U.S. Department of the Interior Office of Surface Mining (OSM), U.S. Department of Agriculture, PFBC, Trout Unlimited, PEC, and EPCAMR. Through this restoration plan effort, the Susquehanna River Basin Commission (SRBC) will be a continuing partner as well.

BACKGROUND DATA

 Due to the large amount of studies and restoration plans completed for Catawissa Creek from the early 1970s to the present, the watershed is not without available data. Lab-certified water quality data from PADEP, SRBC, and the U.S. Geological Survey were utilized for analysis. The focus area of this Restoration Plan is the eventual treatment of the Audenried Tunnel which should restore the entirety of the Catawissa Creek mainstem. However, a detailed analysis of the Green Mountain and Catawissa Tunnel discharges and their quantity statistics and water quality is essential to document how those two discharges have improved in quality over time and do not need treatment for the restoration of the Catawissa Creek mainstem.

Audenried Tunnel Quality

 Audenried Tunnel drains the western portion of the Jeansville Coal Basin (Figure 2). The Audenried Tunnel is the largest flow and the worst water quality outfall that enters Catawissa Creek. The flow exiting the Audenried Tunnel averages around ten times the flow of Catawissa Creek upon their confluence. The average flow discharging out of Audenried is \sim 24 cfs, with a maximum recorded flow of 69 cfs collected on April 9, 1970.

Figure 2. The Audenried Tunnel Outfall into Catawissa Creek

 Just like virtually all deep mine discharges, Audenried is undergoing pyrite decay and has improved over time. Audenried's pH, acidity, iron (Fe), and aluminum (Al) concentrations have all improved significantly over the last five decades (Figures 3 and 4). Since Audenried is improving over time, only recent water quality data should be considered for analysis (Table 3).

Figure 3. Audenried pH (SU) and Acidity Concentration (mg/l) Trends from 1969-2020

Figure 4. Audenried Total Fe and Al Concentrations (mg/l) from 1969-2020

| | Lab pH | Acidity | Fe | Mn | Al | SO ₄ | TDS |
|---------------|--------|----------------|------|------|------|-----------------|------------|
| | SU | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| N | 20 | 20 | 20 | 20 | 20 | 20 | 20 |
| Min | 4.00 | 26.00 | 0.29 | 0.99 | 3.62 | 90.20 | 156.00 |
| Ave | 4.24 | 38.58 | 0.49 | 1.38 | 4.57 | 125.62 | 235.55 |
| Med | 4.20 | 36.30 | 0.36 | 1.29 | 4.25 | 117.50 | 217.00 |
| Max | 4.49 | 58.00 | 3.05 | 2.08 | 6.54 | 185.50 | 394.00 |
| STD | 0.13 | 7.66 | 0.59 | 0.30 | 0.82 | 24.32 | 52.76 |
| 90 Percentile | 4.20 | 50.24 | 0.50 | 2.00 | 6.30 | 170.30 | 305.40 |

Table 3. Water Quality Statistics for the Audenried Outfall from 2018-2020

Audenried Tunnel Quantity and Loading

 According to the historical data, flows exiting Audenried seem to be decreasing slightly (Figure 5). This is probably due to surface reclamation and increased vegetation in the mine poolshed that fuels Audenried. Due to this trend, the flow of Audenried from 1969-2020 and from 2018-2020 was analyzed (Table 4).

Figure 5. Audenried Flows in CFS from 1969 to 2020

| | 1969-2020 | 2018-2020 |
|---------------|------------|------------|
| | CFS | CFS |
| N | 117 | 15 |
| Min | 5.858 | 5.858 |
| Ave | 20.414 | 23.734 |
| Med | 17.010 | 25.947 |
| Max | 69.000 | 44.676 |
| STD | 11.402 | 10.794 |
| 90 Percentile | 36.774 | 37.674 |
| 95 Percentile | 42.960 | ND |
| 99 Percentile | 67.747 | ND |

Table 4. Audenried Flow Statistics from 1969-2018 and 2014-2018

 With a slightly decreasing flow trend and improving water quality, the 2018-2020 average flows and quality will be used when computing average AMD loading (Table 5). On average, Audenried contributes 901 tons per year of acidity, 11 tons per year of Fe, 32 tons per year of manganese (Mn), and 107 tons per year of Al to Catawissa Creek.

| Ave Flow | Ave Acidity | Ave Fe | Ave Mn | Ave Al | Ave SO ₄ | Ave TDS |
|-----------------|---------------------|----------------|----------------|---------|----------------------|-----------------|
| CFS | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| 23.734 | 38.58 | 0.49 | 1.38 | 4.57 | 125.62 | 235.55 |
| | | | | | | |
| | Acidity Load | Fe Load | Mn Load | Al Load | SO ₄ Load | TDS Load |
| | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day |
| | 4,939.59 | 62.74 | 176.69 | 585.12 | 16,083.74 | 30,158.61 |

Table 5. Audenried Average AMD Loading

Audenried Tunnel High Flow Quality, Quantity, and Loading

 Since the eventual ATP will have to be sized to accommodate the high flows from Audenried, an analysis of the high-flow quality, quantity, and loadings that could be encountered is important. Audenried has improved in quality over time and seems to have decreased in flow, so the 20 samples collected since 2018 are only being used for analysis. However, it should be noted that the absolute high flow encountered at Audenried was 69 cfs in 1970.

 Since 2018, the highest flow recorded at Audenried was 44.676 cfs on November 14, 2018. The water quality and loading of Audenried on that date is found in Table 6.

| Flow | Acidity | Fe | Mn | Al | SO ₄ | TDS |
|-------------|---------------------|----------------|---------|---------|----------------------|-----------------|
| CFS | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| 44.676 | 35.00 | 0.30 | 0.99 | 3.63 | 90.20 | 192.00 |
| | | | | | | |
| | Acidity Load | Fe Load | Mn Load | Al Load | SO ₄ Load | TDS Load |
| | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day |
| | 8,435.28 | 72.30 | 238.60 | 874.86 | 21,738.93 | 46,273.55 |

Table 6. Audenried Quantity, Quality, and Loading on November 14, 2018

Green Mountain Tunnel Quality

 Green Mountain Tunnel drains the eastern portion of the South Green Mountain Coal Basin (Figure 6). Green Mountain enters Catawissa Creek only one-third of a mile downstream of Audenried. The average flow discharging out of Green Mountain is 4.49 cfs, with a maximum recorded flow of 10.386 cfs collected on November 14, 2018.

Figure 6. The Green Mountain Tunnel Outfall into Catawissa Creek

 As with almost all deep mine discharges, Green Mountain is undergoing pyrite decay and has improved over time. Green Mountain's pH, acidity, Fe, and Al concentrations have all improved significantly over the last five decades (Figures 7 and 8). Since Green Mountain is improving over time, only recent water quality data should be considered for analysis (Table 7).

Figure 7. Green Mountain pH (SU) and Acidity Concentration (mg/l) Trends from 1975-2020

Figure 8. Green Mountain Total Fe and Al Concentrations (mg/l) from 1975-2020

| | Lab pH | Acidity | Fe | Mn | Al | SO ₄ | TDS |
|---------------------------|----------|----------------|------|------|------|-----------------|------------|
| | SU | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| $\boldsymbol{\mathrm{N}}$ | 21 | 21 | 21 | 20 | 20 | 21 | 19 |
| Min | 3.88 | 8.20 | 0.15 | 0.36 | 1.02 | 23.90 | 98.00 |
| Ave | 4.22 | 19.07 | 0.29 | 0.48 | 1.34 | 31.46 | 172.11 |
| Med | 4.20 | 18.60 | 0.30 | 0.44 | 1.23 | 28.00 | 154.00 |
| Max | 4.40 | 39.00 | 0.40 | 0.79 | 2.78 | 75.00 | 534.00 |
| STD | 0.13 | 7.38 | 0.05 | 0.11 | 0.37 | 11.07 | 88.07 |
| 90 Percentile | 4.40 | 31.00 | 0.30 | 0.68 | 1.79 | 46.42 | 190.00 |

Table 7. Water Quality Statistics for the Green Mountain Outfall since 2018

Green Mountain Tunnel Quantity and Loading

 According to the historical data, flows exiting Green Mountain seem to be increasing (Figure 9). This is probably due to the increased precipitation that the region has received over the last three years and the large surface area that fuels the mine pool drained by Green Mountain. Due to this trend, the flow of Green Mountain from 1975-2020 and from 2018-2020 was analyzed (Table 8).

Figure 9. Green Mountain Flows in CFS from 1975 to 2020

 With an increasing flow trend and improving water quality, the 2018-2020 average flows and quality will be used when computing average AMD loading (Table 9). On average, Green Mountain contributes 84 tons per year of acidity, 1.3 tons per year of Fe, 2.1 tons per year of Mn, and 5.9 tons per year of Al to Catawissa Creek.

| Ave Flow | Ave Acidity | Ave Fe | Ave Mn | Ave Al | Ave SO ₄ | Ave TDS |
|-----------------|---------------------|----------------|----------------|---------|----------------------|-----------------|
| CFS | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| 4.490 | 19.07 | 0.29 | 0.48 | 1.34 | 31.46 | 172.11 |
| | | | | | | |
| | Acidity Load | Fe Load | Mn Load | Al Load | SO ₄ Load | TDS Load |
| | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day |
| | 461.91 | 7.02 | 11.63 | 32.46 | 762.01 | 4,168.79 |

Table 9. Green Mountain Average AMD Loading

Green Mountain Tunnel High Flow Quality, Quantity, and Loading

 Even though treatment of Audenried is all that is needed to restore Catawissa Creek, an analysis of the high-flow quality, quantity, and loadings that could be encountered from Green Mountain is supplied. Since Green Mountain has improved in quality over time and seems to have increased in flow, the 21 samples collected since 2018 are only being used for analysis.

 Since 2018, the highest flow recorded at Green Mountain was 10.386 cfs on November 14, 2018. The water quality and loading of Green Mountain on that date is found in Table 10.

| Flow | Acidity | Fe | Mn | Al | SO ₄ | TDS |
|------------|---------------------|----------------|---------|---------|----------------------|-----------------|
| CFS | mg/l | mg/l | mg/l | mg/l | mg/l | mg/ |
| 10.386 | 18.60 | 0.30 | 0.36 | 1.18 | 27.80 | 154.00 |
| | | | | | | |
| | Acidity Load | Fe Load | Mn Load | Al Load | SO ₄ Load | TDS Load |
| | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day |
| | 1,042.12 | 16.81 | 20.17 | 66.11 | 1,557.58 | 8,628.32 |

Table 10. Green Mountain Quantity, Quality, and Loading on November 14, 2018

Catawissa Tunnel Quality

 The Catawissa Tunnel drains portions of the South Green Mountain Coal Basin (Figure 10). The Catawissa Tunnel is the first tunnel outfall impacting Catawissa Creek and enters about one-mile upstream of Audenried. The average flow discharging out of the Catawissa Tunnel is 1.320 cfs, with a maximum recorded flow of 6.050 cfs collected on May 16, 1998.

Figure 10. The Catawissa Tunnel Outfall into Catawissa Creek

 The Catawissa Tunnel is remote and has not been sampled as extensively as Audenried and Green Mountain. In addition, the Catawissa Tunnel does not impact Catawissa Creek greatly as a population of native brook trout were captured downstream of the discharge. Consequently, and just like Green Mountain, the Catawissa Tunnel does not have to be treated for the restoration of Catawissa Creek.

 As with almost all deep mine discharges, the Catawissa Tunnel is undergoing pyrite decay and has improved over time. The Catawissa Tunnel's pH, acidity, and Fe concentrations have all improved significantly over the last five decades (Figures 11 and 12). The aluminum concentrations have not been sampled enough for trend analysis. Since the Catawissa Tunnel is improving over time, only recent water quality data should be considered (Table 11).

Figure 11. Catawissa Tunnel pH (SU) and Acidity Concentration (mg/l) Trends from 1975-2020

Figure 12. Catawissa Tunnel Iron Concentration (mg/l) Trend from 1975-2020

| | Lab pH | Acidity | Fe | Mn | Al | SO ₄ |
|---------------|--------|----------------|------|------|------|-----------------|
| | SU | mg/l | mg/l | mg/l | mg/l | mg/l |
| $\mathbf N$ | 54 | 54 | 54 | 54 | 53 | 24 |
| Min | 3.80 | 13.00 | 0.45 | 0.17 | 0.92 | 20.00 |
| Ave | 4.17 | 18.90 | 1.02 | 0.32 | 1.35 | 26.40 |
| Med | 4.20 | 18.00 | 0.91 | 0.30 | 1.30 | 20.00 |
| Max | 4.50 | 37.00 | 2.03 | 0.68 | 3.94 | 65.00 |
| STD | 0.17 | 4.91 | 0.42 | 0.11 | 0.26 | 10.60 |
| 90 Percentile | 4.40 | 28.00 | 1.71 | 0.49 | 1.71 | 41.40 |

Table 11. Water Quality Statistics for the Catawissa Tunnel from 1996-1999

Catawissa Tunnel Quantity and Loading

 Since the Catawissa Tunnel is remote and has not been consistently sampled for over a decade, an analysis of all flows collected from 1975-1999 can be found in Table 12. On average, the Catawissa Tunnel contributes 25 tons per year of acidity, 1.3 tons per year of Fe, 0.4 tons per year of Mn, and 1.8 tons per year of Al to Catawissa Creek (Table 13).

| | 1975-1999 |
|---------------|------------|
| | CFS |
| Ń | 83 |
| Min | 0.110 |
| Ave | 1.325 |
| Med | 0.920 |
| Max | 6.050 |
| STD | 1.315 |
| 90 Percentile | 3.020 |
| 95 Percentile | 5.064 |
| 99 Percentile | ND |

Table 12. Catawissa Tunnel Flow Statistics from 1975-1999

Table 13. Catawissa Tunnel Average AMD Loading

| Ave Flow | Ave Acidity | Ave Fe | Ave Mn | Ave Al | Ave SO ₄ | Ave TDS |
|-----------------|---------------------|----------------|----------------|---------|----------------------|-----------------|
| CFS | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| 1.325 | 18.90 | 1.02 | 0.32 | 1.35 | 26.40 | ND |
| | | | | | | |
| | Acidity Load | Fe Load | Mn Load | Al Load | SO ₄ Load | TDS Load |
| | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day | lbs/day |
| | 135.09 | 7.29 | 2.29 | 9.65 | 188.70 | ND |

Catawissa Tunnel High Flow Quality, Quantity, and Loading

 Even though treatment of Audenried is all that is needed to restore Catawissa Creek, an analysis of the high flow quality, quantity, and loadings that could be encountered from the Catawissa Tunnel is supplied. The highest flow recorded at the Catawissa Tunnel was 6.050 cfs on May 16, 1998. The water quality and loading of the Catawissa Tunnel on that date is found in Table 14.

Treatment Plant Influent Projections

 As mentioned, due to Audenried contributing 89 percent of the acidity and 93 percent of the aluminum loading currently entering Catawissa Creek, only Audenried would need to be treated to restore the mainstem. The average flow, quality, and loading that would be handled by the treatment plant is detailed in Table 5. The plant will have to treat, on average, 901 tons/year of acidity and dispose of a little less than 11 tons/year of Fe, 32 tons per year of Mn, and 107 tons/year of Al, considering the effluent concentration standards of the plant. Influent to the plant will also contain, on average, 126 mg/l of sulfate (SO4) and 236 mg/l of total dissolved solids (TDS). On average, the plant will have to treat over 15 million gallons per day (mgd) of water.

 Because of the lack of storage ability within the mine pools contributing the discharge flows, the plant will have to be built to accommodate high flows and loading. The high flow quantity, quality, and loading that would have to be handled by the treatment plant is detailed in Table 6. During a high flow period, the plant will have to be able to treat around 8,435 lbs/day of acidity and dispose of a little less than 72 lbs/day of Fe, 239 lbs/day of Mn, and 875 lbs/day of Al, considering the effluent concentration standards of the plant. According to quantity data from 2014-2019, the plant will have to treat around 29 mgd of water during high flow periods.

Current Catawissa Creek Mainstem Quality

 As mentioned, upstream of Audenried, Catawissa Creek is only slightly impacted by the Catawissa Tunnel (Table 15). The water quality at this station is representative of headwater streams in this area of the Susquehanna River Basin: barely net alkaline with relatively low metals and pH around 6.0. The water quality at this station is good enough to support a small but increasing population of native brook trout. Once Audenried is treated, these native brook trout, as well as natives in practically all of Catawissa Creek's tributary streams, will serve as a source of mainstem recolonizers.

 After the entry of especially Audenried, and to a lesser extent, Green Mountain, the water quality of Catawissa becomes significantly impaired by AMD, particularly in terms of pH, acidity, and Al.

At the Girard Manor Road and upstream (US) Tomhicken Creek stations, the entry of small unimpaired tributary streams have improved the water quality slightly, but still does not meet water quality standards for pH, acidity, and Al.

 After the entry of the larger Tomhicken Creek, which is significantly improved from past AMD impacts through the treatment of the Oneida #1 and #3 Tunnels, Catawissa Creek improves to the point that the water quality could be considered as just meeting standards, particularly since pH is greater than 6.0, alkalinity is greater than acidity, and aluminum is less than 0.75 mg/l. Catawissa Creek continues to slowly improve towards its confluence with the Susquehanna River due to the entry of numerous other small unimpaired tributaries.

| Location | () | pH | Alk. | Acid. | Fe | Mn | Al | SO ₄ | TDS |
|------------------------------|------------|------|------|-------|------|------|------|-----------------|--------|
| | CFS | Lab | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| Catawissa US Audenried | 6.260 | 5.99 | 6.64 | 5.55 | 0.39 | 0.09 | 0.46 | 18.10 | 58.30 |
| Catawissa DS Green Mountain | 37.124 | 4.44 | 4.28 | 26.74 | 0.47 | 0.91 | 2.97 | 78.75 | 172.40 |
| Catawissa at Girard Manor Rd | 51.971 | 4.84 | 1.05 | 17.06 | 0.13 | 0.66 | 1.66 | 63.14 | 89.00 |
| Catawissa US Tomhicken Creek | 136.351 | 5.15 | 1.00 | 6.65 | 0.10 | 0.29 | 0.93 | 30.95 | 56.00 |
| Catawissa DS Tomhicken Creek | 208.067 | 6.18 | 4.00 | 3.74 | 0.11 | 0.22 | 0.67 | 24.60 | 51.00 |
| Catawissa Mouth | 286.870 | 6.35 | 5.00 | 2.00 | 0.06 | 0.12 | 0.20 | 17.70 | 38.00 |

Table 15. Catawissa Creek Upstream (US) and Select Stations Downstream (DS) of Audenried and Green Mountain

Oneida Passive Treatment Systems Summary

 As mentioned, much of Tomhicken Creek has already been restored from the impacts of mine drainage due to construction of the Oneida #1 and #3 Passive Treatment Systems. These systems were constructed by CCRA with funds from PADEP and USEPA. The Oneida #1 Passive Treatment System was constructed in 2001 and Oneida #3 was constructed in 2009. Both treatment systems are oxic limestone drains (OLD) that have been extremely successful to the extent that sections of Tomhicken Creek have been removed from PA's Integrated List of Impaired Waters. (Table 16).

| Location | | pH | Alk. | Acid. | Fe | Mn | Al | SO ₄ | TDS |
|--------------------|------------|------|-------|----------|------|------|------|-----------------|------------|
| | CFS | Lab | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l | mg/l |
| Oneida #1 Influent | .62 | 4.16 | 1.63 | 47.98 | 0.50 | 0.77 | 2.37 | 65.90 | 197.38 |
| Oneida #1 Effluent | 1.62 | 7.40 | 39.30 | -27.30 | 0.25 | 0.17 | 0.59 | 65.07 | 284.29 |
| Oneida #3 Influent | 5.76 | 4.53 | 4.16 | 24.79 | 0.23 | 0.49 | 1.42 | 49.00 | 110.50 |
| Oneida #3 Effluent | 5.76 | 6.95 | 17.91 | -6.49 | 0.23 | 0.13 | 0.58 | 28.45 | 107.38 |

Table 16. Average Water Quantity and Quality of the Oneida Passive Treatment System's Influent and Effluent

RESTORATION GOALS

In recognition that funding to fully restore all AMD-impacted streams in PA does not exist, BAMR established a two-tier framework for restoration goals that can reasonably be achieved (PADEP, 2016). The Upper Tier Restoration Goal includes full aquatic life use attainment and water quality objectives met for all flow conditions. The Lower Tier Restoration Goal, applicable for the majority of AMD-impaired watersheds, includes diverse fish and macroinvertebrate communities with attainment as a recreational fishery along with an expectation that minor exceedances of some water quality objectives will occur for some flow conditions.

Upon entry, Audenried comprises a majority of the Catawissa Creek flow (~90 percent), so if Audenried is treated, Catawissa Creek is restored. In addition, since all tributaries downstream of Audenried are unimpaired by AMD, the treatment goal of Audenried is an effluent quality that creates a net alkaline condition in Catawissa Creek containing low concentrations of Al to allow for fish recolonization (particularly native brook trout).

 Since Audenried and Green Mountain enter Catawissa Creek very near one another, it is very easy to test this hypothesis through a mass-balance equation to predict the treatment effluent quality needed to meet that goal.

 On three separate occasions in 2018/2019, five stations were sampled within hours of each other for quantity and quality. Those five stations included:

- 1. Catawissa Creek Upstream of Audenried
- 2. Audenried Tunnel
- 3. Spies Run (tributary that enters Catawissa Creek between Audenried and Green Mountain)
- 4. Green Mountain Tunnel
- 5. Catawissa Creek Downstream of Audenried/Spies Run/Green Mountain

 With quantities and qualities collected for each of these stations, the quality of the Audenried Tunnel Outfall (#2) can be adjusted to predict the downstream Catawissa Creek (#5) quality through a mass-balance model (Table 17-19).

| Station | $\bf{0}$ | pH | Acid | Fe | Mn | Al | Acid Load Fe Load Mn Load Al Load | | | |
|--|------------|-----------|---------|-------|------|------|-----------------------------------|---------|---------|---------|
| | CFS | SU | mg/l | mg/l | mg/l | mg/l | lbs/day | lbs/day | lbs/day | lbs/day |
| Upstream Audenried | 12.05 | 5.79 | 1.91 | 0.11 | 0.10 | 0.26 | 124.19 | 7.15 | 6.50 | 16.91 |
| Audenried | 31.94 | 4.37 | 26.00 | 0.29 | 1.09 | 3.69 | 4479.87 | 49.97 | 187.81 | 635.80 |
| Green Mountain | 5.53 | 4.34 | 10.03 | 0.20 | 0.39 | 1.20 | 299.11 | 5.96 | 11.63 | 35.79 |
| Spies Run | 5.00 | 5.78 | 3.00 | 0.08 | 0.01 | 0.08 | 80.92 | 2.24 | 0.38 | 2.13 |
| | | | | | | | | | | |
| DS Green Mountain Prediction | 54.52 | 4.51 | 16.95 | 0.22 | 0.70 | 2.35 | 4984.09 | 65.32 | 206.32 | 690.62 |
| DS Green Mountian Actual | 52.19 | 4.56 | 15.00 | 0.26 | 0.65 | 2.23 | 4222.90 | 73.20 | 182.99 | 627.80 |
| % Difference | 4.46 | 1.10 | 13.00 | 15.38 | 7.69 | 5.38 | | | | |
| | | | | | | | | | | |
| Predicted Effluent to Meet Negative Acidity and Al < 0.50 mg/l | | | | | | | | | | |
| Station | 0 | pН | Acid | Fe | Mn | Al | Acid Load Fe Load Mn Load Al Load | | | |
| | CFS | SU | mg/l | mg/l | mg/l | mg/l | lbs/day | lbs/day | lbs/day | lbs/day |
| Upstream Audenried | 12.05 | | 1.91 | | | 0.26 | 124.16 | | | 16.90 |
| Audenried | 31.94 | | -3.00 | | | 0.51 | -516.91 | | | 87.87 |
| Green Mountain | 5.53 | | 10.03 | | | 1.20 | 299.22 | | | 35.80 |
| Spies Run | 5.00 | | 3.00 | | | 0.08 | 80.92 | | | 2.13 |
| | | | | | | | | | | |
| DS Green Mountain Prediction | 54.52 | | -0.04 | | | 0.49 | -12.62 | | | 142.70 |

Table 18. Mass-Balance Audenried Effluent Quality Prediction on March 28, 2018 (Yellow is predicted Audenried effluent to generate (blue) Catawissa Creek instream quality.)

Table 19. Mass-Balance Audenried Effluent Quality Prediction on September 7, 2019 (Yellow is predicted Audenried effluent to generate (blue) Catawissa Creek instream quality.)

| Station | 0 | рH | Acid | Fe | Mn | Al | Acid Load Fe Load Mn Load | | | Al Load |
|--|------------|------|---------|------|-------------------|------|---------------------------------------|---------|---------|---------|
| | CFS | SU | mg/l | mg/l | mg/l | mg/l | lbs/day | lbs/day | lbs/day | lbs/day |
| Upstream Audenried | 0.545 | 5.93 | 13.00 | 0.01 | 0.04 | 0.03 | 38.22 | 0.03 | 0.12 | 0.09 |
| Audenried | 9.164 | 4.04 | 58.00 | 0.38 | 1.77 | 5.30 | 2867.28 | 18.79 | 87.50 | 262.01 |
| Green Mountain | 1.416 | 4.18 | 27.00 | 0.15 | 0.53 | 1.05 | 206.25 | 1.15 | 4.05 | 8.02 |
| Spies Run | 0.519 | 6.42 | 11.00 | 0.09 | 0.02 | 0.04 | 30.80 | 0.25 | 0.06 | 0.11 |
| | | | | | | | | | | |
| DS Green Mountain Prediction | 11.644 | 4.10 | 50.03 | 0.32 | 1.46 | 4.30 | 3142.55 | 20.21 | 91.72 | 270.23 |
| DS Green Mountain Actual | 10.890 | 4.42 | 38.00 | 0.09 | 0.97 | 2.80 | 2232.38 | 5.29 | 56.98 | 164.49 |
| % Difference | 6.48 | 0.23 | 24.05 | | 71.88 33.56 34.88 | | | | | |
| | | | | | | | | | | |
| Predicted Effluent to Meet Negative Acidity and Al < 0.50 mg/l | | | | | | | | | | |
| Station | 0 | pН | Acid | Fe | Mn | Al | Acid Load Fe Load Mn Load Al Load | | | |
| | CFS | SU | mg/l | mg/l | mg/l | mg/l | lbs/day | lbs/day | lbs/day | lbs/day |
| Upstream Audenried | 0.545 | | 13.00 | | | 0.03 | 38.220571 | | | 0.09 |
| Audenried | 9.164 | | -6.00 | | | 0.46 | -296.6154 | | | 22.74 |
| Green Mountain | 1.416 | | 27.00 | | | 1.05 | 206.24543 | | | 8.02 |
| Spies Run | 0.519 | | 11.00 | | | 0.04 | 30.797634 | | | 0.11 |
| | | | | | | | | | | |
| DS Green Mountain Prediction 11.644 | | | -0.34 | | | 0.49 | -21.35173 | | | 30.96 |

 As calculated in Tables 17-19, the effluent of the eventual Audenried ATP would not have to discharge high alkalinity concentrated water to ensure net alkalinity in the Catawissa Creek mainstem. An ATP net alkalinity between 3-6 mg/l would ensure a net alkaline Catawissa Creek under the varying flow regimes sampled. In summary, higher alkaline concentrated effluent needed during low flow conditions, less needed under high flow conditions.

 This analysis also allows us to estimate the average amount of lime needed and cost to treat the acid load of Audenried and impart the slight net alkalinity needed to restore the mainstem of Catawissa Creek (Table 20).

Table 20. Estimate of Lime Quantities and Associated Costs Under Varying Flow Regimes for the Audenried ATP

| | Audenried | Acid Load | Lime | Lime | Cost/mgd |
|----------------------|------------------|------------------|------------------|-----------|----------|
| Sampling Date | mgd | Tons/Year | Tons/Year | Cost/Year | |
| 12/11/2018 | 21.33 | 1170 | 968 | \$242,000 | \$11,346 |
| 3/28/2019 | 20.64 | 912 | 755 | \$189,000 | \$9,157 |
| 9/17/2019 | 5.92 | 198 | -64 | \$41,000 | \$6,926 |

 Using a ratings curve analysis equation of the cost/cfs value, at the average Audenried flow of 15.34 mgd, the Cost/mgd should be around \$8,814. Consequently, average annual cost of lime for the ATP should be around \$135,000 (AMDTreat estimates \$173,000). Consequently, annual lime costs should be around \$150,000 plus or minus a percentage based upon annual precipitation and flows.

Fish and Macroinvertebrates

 Detailed macroinvertebrate and fish data for Catawissa Creek can be found in Appendices F and G. Below is a summary and analysis of that data.

 On September 17 and 18, 2019, SRBC electrofished four reaches of Catawissa Creek, upstream and downstream of Tomhicken Creek, as well as upstream and downstream of the Audenried/Green Mountain Tunnels. Electrofishing surveys were conducted using the SRBC protocol of three passes, through a reach 10 times average wetted width, with a minimum reach length of 100 meters (Shank et al., 2016).

 Downstream of Tomhicken Creek, 13 species were collected totaling 207 fish, including brown and brook trout (Appendix G). The fact that no young-of-the-year trout were caught suggests that trout in this stretch had been stocked or traveled in from unimpaired tributaries. The most abundant species in this reach were eastern blacknose dace, green sunfish, and white suckers, making up 80 percent of the fish collected. Upstream of Tomhicken, only three species of fish were collected, totaling 17 individuals. Of the 17 fish caught, 15 were creek chubs, one of the most pollution-tolerant fishes found in PA. Catawissa Creek at Girard Manor Road is located over three river miles downstream of the Green Mountain Tunnel. In three 100-meter passes, not a single fish was captured at this site. These results demonstrate that without the increased water quality from Tomhicken, the upper reaches of Catawissa Creek are nearly to completely uninhabitable to fish due to AMD loading. Upstream of Audenried Tunnel, 20 brook trout and 20 eastern blacknose dace were collected, demonstrating the minimal impairment caused by the Catawissa Tunnel.

 Once the water from the Audenried Tunnel is treated, recolonization of fish populations should happen quickly from the many unimpaired tributaries that contain native brook trout populations, from Catawissa Creek downstream of Tomhicken, and from Catawissa Creek upstream of Audenried. Mainstem restoration will also allow reconnection and migration of those fish populations.

 On March 28, 2019, macroinvertebrates were sampled from five sites along the mainstem of Catawissa Creek (Appendix F). Upstream of the Audenried Tunnel, macroinvertebrate indices indicate a stream that could be delisted. Index of Biological Integrity (IBI) scores generally decreased as the sites moved downstream. Water quality improves with distance from the discharges due to high water quality inputs from Catawissa Creek tributaries. As the pH increases, Al precipitates and covers the substrate, filling interstitial spaces, thus reducing available macroinvertebrate habitat. This is why sites further downstream with better water quality actually have less macroinvertebrate density. The improved water quality allows Al to precipitate, which impacts available habitat.

 Macroinvertebrate recolonization will occur post-restoration, although likely not as quickly as the fish. Storms will scour precipitated metals from the substrate, opening habitat to macroinvertebrate recolonizers from the tributaries that are pushed downstream by forces, such as catastrophic and behavioral drift.

 Because PFBC plans to manage 18 miles of Catawissa Creek as a TSF and another 23.5 miles as a WT fishery, SRBC believes that those combined 41.5 miles of Catawissa Creek will at least meet the Lower Tier Restoration Goals (PADEP 2016). Those miles may even achieve the Higher Tier Restoration Goals since Audenried comprises a vast majority of the watershed AMD loading.

Technology Analysis

 The high flow volume of Audenried eliminates any possibility of using passive treatment technologies. Using PADEP's Risk Analysis Matrix for Passive Treatment Systems, the risk of constructing a passive treatment system would be considered as "High" (Table 21). To fit into a "Medium" risk analysis, the influent would have to be split into nearly 27 passive treatment cells during average flows.

 Over the last 10 years, PADEP has identified streams where one large ATP treating large quantities of discharge water could restore significant stream miles. The Lancashire ATP has improved about 30 miles of the West Branch Susquehanna River and has created a significant brown trout fishery near the towns of Northern Cambria and Cherry Tree. The Hollywood ATP

has improved about 33 miles of the Bennett Branch of Sinnemahoning Creek to the point that sections are now being stocked with trout by the PFBC. The Cresson ATP, which has just recently come online in 2019, has the potential to restore/improve 21 miles of Clearfield Creek.

 In addition to these already constructed facilities, PADEP also has plans to design and construct 1) the Wehrum ATP, which will restore/improve 25 miles of Blacklick Creek; 2) an ATP in the headwaters of Little Conemaugh River, which will restore/improve 20 miles; and, 3) the Quakake ATP, which will restore/improve 11 miles of the Lehigh River. Possible large-scale ATPs have also been planned for Chartiers Creek just outside of Pittsburgh, Shade Creek in Somerset County, and in the Tioga River Watershed in Tioga County.

 BAMR is committed to constructing the Audenried ATP and conducting long-term O&M of the plant once property ownership is resolved.

| Risk Analysis Matrix | | | | | | | | | |
|-----------------------------|--|--------------------------|--------------------------|--------------------------|--|--|--|--|--|
| Summation of Fe and | Design Flow Rate for each treatment cell | | | | | | | | |
| Al Concentration | < 25 GPM | > 25 < 50 GPM | > 50 < 100 GPM | >100 < 200 GPM | | | | | |
| $<$ 5 mg/l | Low | Low | Low | Low | | | | | |
| $> 5 < 15$ mg/l | Low | Medium | Medium | Medium | | | | | |
| $>15 < 25$ mg/l | Low | Medium | Medium | Medium | | | | | |
| $> 25 < 50$ mg/l | Medium | Medium | Medium | High | | | | | |
| > 50 mg/l | High | High | High | High | | | | | |
| | $>$ 200 $<$ 400 GPM | >400 < 800 GPM | > 800 < 1600 GPM | >1600 GPM | | | | | |
| $<$ 5 mg/l | Medium | Medium | Medium | High | | | | | |
| $> 5 < 15$ mg/l | Medium | High | High | High* | | | | | |
| $>15 < 25$ mg/l | High | High | High | High | | | | | |
| $> 25 < 50$ mg/l | High | High | High | High | | | | | |
| > 50 mg/l | High | High | High | High | | | | | |

Table 21. PADEP Passive Treatment System Risk Analysis Matrix

 Although the eventual Audenried ATP will be designed similarly to the Quakake ATP due to similar quantity and quality to be treated, the Quakake ATP is still in design so no substantive size or cost comparisons can be made at the present.

 Consequently, the Hollywood ATP capital and operation and maintenance (O&M) costs will be used as a starting point to estimate costs for the Audenried ATP. According to PADEP, Hollywood treats an average of 2.88 mgd of water and treated 4.61 mgd in 2018, the wettest year on record. On average, the Audenried ATP would have to treat 15.3 mgd and a high of around 28.9 mgd because the Jeansville Mine Pool is free-draining and offers no real ability for storage. To accommodate the typical average and the infrequent high flow periods, the Audenried ATP will need multiple clarifiers and/or larger clarifiers than the Hollywood ATP. For instance, an initial estimate of clarifier size to handle 28.9 mgd is two 250-foot diameter clarifiers with a water depth of 13-18 feet, plus 1.5-2 feet of freeboard.

 There could also be an option for incorporating some of the existing failed passive treatment plant features into the ATP design. For instance, there are three 120-foot diameter concrete holding tanks currently onsite that could be used for water storage or pre-treatment.

 In terms of loading between the two plants, the water at Catawissa is not as degraded as the influent treated at Hollywood (Table 22). The Audenried ATP will have to treat similar acid loading compared to the Hollywood Plant. Fe at Audenried is significantly less than at Hollywood, while around 30 percent more Al would need to be treated and disposed of at Audenried. However, when combined, metal sludge disposal quantities at Audenried are expected to be about half as much as generated at Hollywood. So even though capital construction costs at Audenried will be greater than at Hollywood due to the need of larger and more clarifiers, there is the potential of lower annual treatment and disposal costs as compared to the Hollywood ATP.

The costs to construct the Audenried ATP should be relatively comparable to the 2020 adjusted costs to construct the Hollywood ATP. As discussed, the only significant difference may be the need for a larger-sized primary and an additional secondary clarifier to accommodate the high flows at Audenried, particularly due to the lack of mine pool storage potential.

The Hollywood ATP includes two ferrous Fe oxidation reactors, a 180-foot diameter clarifier, two sludge conditioning reactors, a high-density slurry system that includes sludge recirculation technology, and a 4.5-acre polishing pond (Figure 13).

Figure 13. Aerial Photo of the Hollywood ATP

 According to PADEP, the 2017 adjusted cost to construct the Hollywood ATP was \$15,509,262. Adjusted to 2020 costs and the need for a larger and additional clarifier (an additional \$990,121 according to OSM's AMDTreat software), capital construction costs for the Tioga ATP could be as high as \$17,312,493 (www.usinflationcalculator.com). Adding in 10 percent for engineering, total design and construction could total **\$19,043,742**.

Alternatives Analysis

 As mentioned, due to the large volume of the Audenried Tunnel, a passive treatment system alternative or other type of active treatment is not feasible. This was proven by the failed passive Audenried Tunnel AMD Passive Treatment Project. Initiated in 2005, this passive treatment system included three circular concrete tanks filled with high calcium limestone that functioned as a large OLD. Treated water then exited these tanks into an approximately 2-acre settling basin that was significantly undersized for the amount of aluminum loading that needed to precipitate prior to re-entry to Catawissa Creek. However, even before considering those design flaws that were predicated on treatment site limitations, the passive system was significantly damaged by high tunnel flows from Tropical Storm Lee in 2011. The passive treatment system remains offline today.

 In addition, the high volume of water that is to be treated from Audenried classifies it as "High Risk" in PADEP's Risk Analysis Matrix. The volume of water is so great that it would have to be split into 27 treatment cells to qualify as a "Medium Risk" under average flow conditions. A 27-cell passive treatment system would obviously not be feasible and would cover a massive area that is not available outside the 100-year floodplain downstream of Audenried. According to AMDTreat software, a 27-cell passive treatment system would be around 38 acres to adequately treat the average flow from Audenried and 71 acres to adequately treat the high flow. According to PADEP, the Hollywood ATP has a project footprint of 41 acres.

 SRBC agrees with PADEP and recommends that the only cost and size feasible method for treatment of the proposed Audenried influent is a hydrated lime/clarifier ATP, similar to the Hollywood ATP that treats poorer water quality but at a reduced volume.

OPERATION AND MAINTENANCE

 O&M at the Audenried ATP should be lower than the annual O&M costs at the Hollywood ATP, mainly due to the metal loading of the influent being significantly less. According to OSM's AMDTreat software, the chemical cost of running the Audenried ATP is estimated as \$173,318 per year (Appendix I). Adding in normal electrical and labor costs of other similar ATPs that include pumping of water and sludge, total yearly O&M costs of the Audenried ATP could be as high as **\$541,318**.

 Discharge water from Audenried can be conveyed to the proposed plant location by gravity. The proposed site also has enough room outside the 100-year floodplain to accommodate the multiple clarifiers needed to treat the amount of flow exiting Audenried.

Recent ATPs constructed by PADEP are not fully, but highly automated to the point that operational personnel are not needed at the plant at all times. Real-time monitoring instrumentation has also been installed at all the more recent ATPs to assist with O&M. PADEP is also financially committed to the long-term operational viability of the plant due to the amount of stream mileage restored.

In terms of maintenance, the most significant issue will be managing the amount of influent flows during periods of heavy precipitation. As mentioned, the Audenried Passive Treatment System was destroyed by extreme influent flows caused by heavy precipitation from Tropical Storm Lee in 2011. ATP designs will ensure that operations are in place to manage the amount of flow coming into the plant, allowing bypass when situations like a tropical storm occur.

When operating an ATP, maintenance is constant: ensuring proper flows entering, adding required lime amounts, and pumping sludge from the plant. However, unlike a passive system, an ATP allows for the real-time operation and automation of those maintenance duties, increasing the amount of control over the treatment process, which is a must with a flow the size of Audenried. Annual O&M costs for the ATP should only be around three percent of the construction costs.

Benefit/Cost Analysis

 To determine the value of the benefits of restoring Catawissa Creek, PFBC's Recreational Use Loss Estimates for PA Streams Degraded by AMD for base year 2006 adjusted to 2020 were used from PADEP's *Acid Mine Drainage Set-Aside Program: Program Implementation Guidelines* document (2016).

Stream Segment #1 Chapter 93 Designation: TSF Projected Use: TSF Miles Restored: 14 Use Rate: 1,100 trips/year/mile Valuation in 2020 Dollars from https://www.usinflationcalculator.com/: \$100.12 Lost Value: \$1,541,848

Stream Segment #2 Chapter 93 Designation: TSF Projected Use: TSF Miles Restored: 4 Use Rate: 1,100 trips/year/mile Valuation in 2020 Dollars from https://www.usinflationcalculator.com/: \$100.12 Lost Value: \$440,528

Stream Segment #3 Chapter 93 Designation: CWF Projected Use: WT Miles Restored: 23.5 Use Rate: 500 trips/year/mile Valuation in 2020 Dollars from https://www.usinflationcalculator.com/: \$84.70 Lost Value: \$995,225

 The Net Present Value (NPV) of the benefits can be calculated using the uniform series, present worth equations, or values extracted from the uniform series present worth table in Appendix E of PADEP's *Acid Mine Drainage Set-Aside Program: Program Implementation Guidelines* document (2016).

 The annual economic lost values of the portions of Catawissa Creek identified above are the basis of the project's NPV benefit Evaluation. The lost value is **\$2,977,601**. The following parameters are then applied to the NPV equation:

> N=50 Year $I=5\%$ USPWF=18.25593

Net Present Benefit = \$2,977,601 x 18.25593 = **\$54,358,875.40**

*Costs of the plant can overrun cost projections by \$25,432,869.90 and still meet the Benefit/Cost Analysis.

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APPENDIX A

December 10-12, 2018, Sampling Station Maps

APPENDIX B

December 10-12, 2018, Water Quality Data

APPENDIX C

Audenried Tunnel Outfall Data

APPENDIX D

Green Mountain Tunnel Outfall Data

APPENDIX E

Catawissa Tunnel Outfall Data

APPENDIX F

Catawissa Creek Macroinvertebrate Data

APPENDIX G

Catawissa Creek Fish Data

APPENDIX H

Catawissa Creek Habitat Data

APPENDIX I

AMDTreat Estimation of Annual Hydrated Lime Amounts and Costs for the Audenried ATP

