



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

21 OCT 2004

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REGIONAL OFFICE

Jim Hull, Director
Water Pollution Control Program
Water Protection and Soil Conservation Division
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Dear Mr. Hull:

Re: Approval of the TMDL for Tributary to Big Otter Creek

This letter responds to the submission from the Missouri Department of Natural Resources (MDNR) received by the Environmental Protection Agency (EPA) on October 04, 2004, for one Total Maximum Daily Load (TMDL) document which contains a TMDL for pH. Tributary to Big Otter Creek was identified on the 1998 and the 2002 Missouri §303(d) lists as impaired as a result of pH. This submission fulfills the Clean Water Act statutory requirement to develop TMDLs for impairments listed on a state's §303(d) list. The specific impairment (water body segment and pollutant) are:

Table with 4 columns: Water Body Name, WBID, Listed pollutant, TMDL pollutant. Row 1: Tributary to Big Otter Creek, 1225, pH, pH

EPA has completed its review of the TMDL with supporting documentation and information. By this letter, EPA approves the submitted TMDL. Enclosed with this letter is the Region 7 TMDL Decision Document which summarizes the rationale for EPA's approval of the TMDL. The EPA believes the separate elements of the TMDL described in the enclosed form adequately address the pollutant of concern, taking into consideration seasonal variation and a margin of safety.

EPA is currently in consultation under Section 7 of the Endangered Species Act with the U.S. Fish and Wildlife Service regarding this TMDL. While EPA is approving this TMDL at the present time, EPA may decide that changes to the TMDL are warranted based upon the results of the consultation when it is completed.

EPA appreciates the thoughtful effort that MDNR has put into this TMDL. EPA will continue to cooperate with and assist, as appropriate, in future efforts by MDNR to develop the remaining TMDLs.

Sincerely,

A handwritten signature in black ink, appearing to read "Leo J. Alderman", with a long horizontal flourish extending to the right.

Leo J. Alderman  
Director  
Water, Wetlands, and Pesticides Division

Enclosure

cc: Ann Crawford  
TMDL Coordinator, Jefferson City, MO

Phil Schroeder  
MO Dept of Natural Resources, Jefferson City, MO

Scott Dye  
Sierra Club, Columbia, MO



## EPA Region 7 TMDL Review

**TMDL ID** 317 **Water Body ID** MoWBID 1225  
**Water Body Name** Tributary to Big Otter Creek  
**Pollutant** pH  
**Tributary**  
**State** MO **HUC** 10290108  
**Basin** Upper Deep Water Creek - Arm of Truman Lake  
**Submittal Date** 10/4/2004  
**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 October 04, 2004; submitted as a final TMDL document, under a cover letter dated September 27, 2004, as revised on October 12, 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.*

The pH water quality standards require contaminants shall not cause the pH to be outside the range of 6.5 to 9.0 SU. The allocations are set with a margin of safety, at the WQS criteria levels, which are adequate to result in attainment of the applicable WQS.

### 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 The Tributary to Big Otter Creek are described, and the WQS for those beneficial uses are described. The targets are taken directly from the water quality criteria in Missouri's water quality standards for pH. An additional target of alkalinity was established for the impairment caused by excess acidity to assure the pH target would be attained in the Tributary to Big Otter Creek.

#### **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 pH. The relationship between the numeric targets and the pollutants is direct. The alkalinity target was derived using in-stream chemistry data and performing a correlation analysis to the pH WQS; the alkalinity target assures the load capacity for acidity (low pH) is not exceeded.

#### **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 acid (pH) is described. The major contribution was determined to be abandoned mine drainage. The submittal demonstrates that all significant sources of acidity (pH) 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.*

Tributary to Big Otter Creek will have to meet in-stream WQS for pH (6.5-9.0 SU) and an alkalinity target of 45 mg/L or greater.

#### **WLA Comment**

The WLA is zero.

#### **LA Comment**

The load allocation for pH is established as within the range of 6.5 to 9.0 SU. The load allocation for the second acid-related endpoint, alkalinity, is established as 45 mg/L (as calcium carbonate) or greater.

#### **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.*

An implicit MOS is identified for the low pH impairment as using a secondary target of alkalinity since it is a measurable characteristic in the Tributary of Big Otter Creek and can be linked to the pH water quality criterion; alkalinity has units of mg/L as calcium carbonate as discussed in Standard Methods for the Examination of water and Wastewater.

#### **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 pH does 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 July 30 to August 29, 2004; one comment was 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).*

The Tributary to Big Otter Creek is included in MDNR's continuous monitoring plan sampled annually. Ambient and low flow monitoring for chloride, sulfate, alkalinity, pH, and acidity will be done four times a year.

#### **Reasonable assurance**

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

Not required, because there are no facilities requiring waste load allocations.

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