- **Why did EPD not require a COPC exceedance contingency plan to be included in the MLUP?**
- **Will EPD require a COPC exceedance contingency plan to be included in the MLUP?**
- **What are the applicable regulatory standards for mercury?**

EPA 1631E and EPA 1669 are sampling methods, not standards.

In EPA 1631E, Introduction, page iii,

> *"CWA Section 303 requires each State to set a water quality standard for each body of water within its boundaries. A State water quality standard consists of a designated use or uses of a water body or a segment of a water body, the water quality criteria that are necessary to protect the designated use or uses, and an antidegradation policy. CWA Section 304(a) requires EPA to publish water quality criteria that reflect the latest scientific knowledge concerning the physical fate of pollutants, the effects of pollutants on ecological and human health, and the effect of pollutants on biological community diversity, productivity, and stability. These water quality standards serve two purposes: (1) they establish the water quality goals for a specific water body, and (2) they are the basis for establishing water quality-based treatment controls and strategies beyond the technology-based controls required by CWA Sections 301(b) and 306.*
>
> *"In 1987, amendments to the CWA required States to adopt numeric criteria for toxic pollutants (designated in Section 307(a) of the Act) based on EPA Section 304(a) criteria or other scientific data, when the discharge or presence of those toxic pollutants could reasonably be expected to interfere with designated uses. Method 1631 was specifically developed to provide reliable measurements of mercury at EPA WQC levels."*

- **Does this boil down to Twin Pines has to abide by GA-EPD's TMDL for mercury?**
- **TMDLs are typically for water bodies, not for land. So, which TMDL are the miners required to use for regulatory standards for mercury?**
- **And what are the miners required to do if they exceed the TMDL, or whichever regulatory standard applies?**

Spills

During and just after Hurricane Irma in 2017, the only pollution spills reported in the Suwannee River Basin in Florida, other than a couple of diesel spills from military vehicle accidents, were from three Chemours TiO2 mine sites on Trail Ridge.[4] Here is an excerpt from the report for Chemours Maxville Mine near Starke, Bradford County, Florida,

[4] Spills in the Suwannee River Basin, in Florida Public Notice of Pollution, WWALS, 29 September 2017, https://wwals.net/?p=37541#basin, data from Florida Pollution Notices, http://prodenv.dep.state.fl.us/DepPNP/reports/viewIncidentDetails?page=1