Response to Comments on Mineral Mine General Permit

A. The pH limit should be 6 - 9 standard units (SU) as it has been

1. The pH limit should not be changed, and no further monitoring should be required. Other states in this area use 6.0 - 9.0, as does EPA. The existing pH limit is adequately protective, and MDE has offered no justification of the need for the change.

The 6-9 range, which is specified in the federal effluent limitation guidelines and is widely used, is a technology limit only. Maryland regulation, at COMAR 26.08.03.01.C(2) (b), states that technology based limits shall be superseded by whatever is necessary to protect established water quality standards. Maryland has established a water quality based pH limit of 6.5 - 8.5 in COMAR 26.08.033 A.(4) , and the burden of proof is on the operator to demonstrate that s/he is not violating Maryland water quality standards. However, the Maryland waters that are impaired by low pH are currently limited to areas west of Town Creek in Allegany County. NOI reviews and registrations under this general permit will specify the lower pH limit of 6.5 or 6.0 depending upon the potential vulnerability of receiving water.

2. The pH in natural waters is often below 6.5 (43% of the time in the Choptank). Mines should not have to adjust the pH of natural waters.
Sand and gravel pits in areas without power or storage cannot adjust pH.

If precipitation is causing a low pH in the area of the mine, the ambient water quality will be affected as well, and the discharge should not have a lower pH than the natural water. Instream pH measurements have been included in the permit as an alternative for facilities whose discharges do not meet the water quality standard due to a low pH.

Language included in the draft permit addressed this concern by allowing the permittee to discharge water with a pH between 6.0 and 6.5 (except in Western Md) or between 8.5 and 9.0, if it does not cause the pH of the receiving waters to violate the water quality standard of 6.5 - 8.5 SU. Such a discharge is also permitted if it does not cause the receiving waters, beyond ten feet from the discharge point, to vary further from the water quality limit if the pH of the ambient stream does not meet that limit. "

3. The alternative to measure the impact of the discharge upon the pH of the receiving water is not helpful because we can't measure upstream or downstream (the discharge enters the waters of the state at a point that's too distant from the pit).

A separate pH report is unnecessary, this information should be included in the discharge monitoring report.

The instream pH measurements are included in the permit as an alternative for facilities whose discharges do not meet the water quality standards at the outfall points, and the results of the stream pH monitoring are used to determine whether or not the effluent water quality is acceptable. These results do not belong on the discharge monitoring report because the permittee is only partly responsible for the quality of the water in the stream.

If the operator is unable to access a suitable monitoring point in the stream, then neither MDE nor the operator can assume the water quality outcome resulting from adding the discharge to the receiving stream, and the Department has no choice but to apply the water quality standard at the end of the pipe.

B. Product information

1. The permit requires the submission of names of new products with adequate toxicity data. MDE doesn't have the authority to require the names of wastewater treatment additives and admixtures. This information is not even required of industrial sources in major source categories subject to individual permits. MDE has written into the permit the power to screen the ingredients and products which the facility uses, and laws limit MDE's authority to impose such restrictions and prohibitions.

The need for certain products can change frequently, often with less than 30 days notice. The proposed approach is very burdensome to permittee and MDE, and may make it impossible for us to meet customer requirements in a timely fashion, causing hardship to our business.
MDE does require similar information for additives that are likely to be present in discharges, even in very small quantities, from applicants for individual permits. It is MDE's responsibility to prevent the discharge of toxic wastewaters and make sure that permitted discharges do not cause toxicity in receiving streams.

2. For a ready-mix plant, the pH limit requires the use of an acid to comply, but the common treatment acids are on the EPA ECOTOX website.
Full strength acids are toxic, but in the proper amount, an acid will keep the pH of the discharge within water quality limits. The pH monitoring of the discharge is sufficient to be sure the acids are being used in the proper amount. We have exempted the most common treatment chemicals, inorganic acids, alum, and ferric chloride, from the requirement to report manufacturer's information and toxicity data.

3. Manufacturers do not always provide a list of all ingredients in their products. Aquatic toxicity information is not available from most manufacturers of chemical admixtures. We're being asked to provide information that isn't available. Manufacturer's information should be limited to MSDS sheets. We propose that concrete producers be required to maintain a current list of all admixtures used at the facility, and MSDS sheets on-site.

What criteria will MDE use to determine if sufficient information has been submitted to prove it is not toxic?
As mentioned in the fact sheet, MSDS sheets seldom include aquatic toxicity, and further information is needed to make sure there will not be water quality impacts from the discharges.

Recognizing the limited amount of information available on concrete additives, MDE has removed the requirement to submit aquatic toxicity information. Biomonitoring will be required for internal wastewaters including concrete additives.

The permit language has been changed as follows:

> ***Part IV*** **C. Wastewater Treatment Chemicals and Concrete Admixtures.**
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> 1. The applicant shall submit with the NOI the names of wastewater treatment additives and admixtures (for concrete plants), currently in use at the facility and potentially discharging to surface water of the State, and facility specific estimates of concentrations of each that will exist in the effluent.

2. No later than 30 days before changing or adding any wastewater treatment chemicals or concrete admixtures, the permittee shall submit the names of the new products to the Department.

3. Accompanying the product list for all wastewater treatment additives, except muriatic acid, sodium carbonate, and lime, shall be all available corresponding aquatic toxicity data, which may be found on http://cfpub.epa.gov/ecotox/; manufacturer's information on chemical composition of the product; and a facility specific estimate of concentrations that will exist in the effluent.

C. Biomonitoring cannot be done on these discharges.

1. Biomonitoring is not workable as ready mix facilities don't have regular discharges. The chronic toxicity testing specified requires repeat samples over several days.
Because the discharges from these sites are often intermittent, and production is more frequent than discharges, the permit has been modified to require biomonitoring at internal sampling points, such as the last holding pond.

2. There is no evidence to suggest discharges from our operations have resulted in degradation of receiving streams. These requirements should be removed and studied more thoroughly to determine whether the residual discharge waters are harmful to the environment. Defer until there is data showing it is reasonable and necessary. It is unreasonable and improper to require biomonitoring without a scientific basis on which to justify the program and where there is data to show the material is nontoxic.
Sufficient information has not been provided to show the materials are nontoxic. MDE has reviewed the toxicity information provided. Several components of the products listed are toxic in small quantities. However, performing biomonitoring at internal sampling points will allow MDE and the industry to learn more about the characteristics of the potential wastewater.

3. Biomonitoring isn't possible for concrete because mixtures change, the quantity of effluent changes, and not every combination could be tested. Too many variables exist to be able to test every combination.
MDE has heard the comments of the industry and understands that the concrete admixtures are used in different combinations and quantities. We also understand that the amount of concrete discharged in washing is very small, further diluting the chemicals introduced into each batch of concrete.
The nature of the chemicals is varied, and some of them do show up on EPA's ECOTOX database, showing that they can be toxic in some circumstances. For these reasons, we have requested monitoring of internal wastewater that will include additives in batches and combinations similar to those in which they may be discharged, making sure that each class of admixture is present in at least a few of the samples. While these exact wastewaters may never be discharged, the combination of tests will offer an idea of the toxicity of typical wastewaters. It may be that none of the combinations tested is toxic, in which case no biomonitoring will be required after the first year. If some combinations do not pass the WET test, MDE and industry representatives will be able to look for patterns of chemical use that should be avoided.

4. Concrete admixtures will be discharged at only a fraction of the concentration of TSS, which is already limited at a low level.
Many chemicals are toxic at very low levels. There is also a possibility that non toxic additives will have synergistic effects and result in a toxic wastewater.

5. There is no scientific data or rationale for toxicity and biomonitoring reporting (MDE must provide a fact sheet). MDE has provided no information that it has considered the toxicity information provided by LaFarge or others. MDE has the burden of explaining its reasons for requiring any discharger to monitor for toxic discharges in its effluent. Aquatic toxicity of products would be inconclusive for effluent testing. MDE has ignored that concrete additives do not have any suspected aquatic toxicity. In particular, aquatic toxicity which may be found on Aqua Tox is unclear and would not produce meaningful data . Data submissions are unclear and will not produce meaningful data.
See response to C.2, above. Biomonitoring requirements are specified under COMAR 26.08.03.07E, and these tests provide the most definitive information about toxicity.

6. There is no option for conducting toxicity testing of the individual admixtures. While we don't currently have toxicity data from our admix suppliers, this should be an option for satisfying the NOI or a change in product submittals to MDE. In addition, if a producer wanted to, could they conduct toxicity testing on the individual admixtures themselves instead of on the plant discharge?
The biomonitoring test is more definitive than separate tests of different admixtures, and will detect any synergistic effects that occur.

7. Any comprehensive sampling effort without specific parameters to define "non toxic" will be inconclusive, and may result in thousands of dollars in sampling costs and labor to compute and interpret the results with no guarantee that MDE would accept the results and concur with the results of the study. The requirements of the biomonitoring plan submitted to MDE should allow flexible sampling schedules
MDE requires submission of the biomonitoring plan prior to its implementation to ensure that the sampling results will be acceptable, provided the protocol described is followed. The plans submitted should include a schedule that is acceptable to the industry involved.

8. Biomonitoring and toxicity information is new to our admixture suppliers and our industry. We need a workable method for conducting testing. The permit as written does not give us the flexibility of a workable solution that will allow compliance within our industry.
Recognizing the limited amount of information available on concrete additives, MDE has removed the requirement to submit aquatic toxicity information. Biomonitoring will be required for internal wastewaters including concrete additives.

9. Except for a single group option, there is no alternative to biomonitoring at every facility.
The group option does not specify individual admixtures.
The Department has removed the group option because the industry representatives we heard from did not believe it would be useful, and because the vast majority of facilities submitting discharge data during the past year were part of large companies with several plants.
Those facilities that have not discharged in the past year will not be required to submit results from biomonitoring.
The Department reserves the right to require a second set of biomonitoring tests during the life of the permit without reopening it.
The biomonitoring requirement was meant to offer an indication of overall toxicity of the discharges, rather than specific information about individual products.

10. Facility specific estimate of concentrations in estimate is not clear and would not produce meaningful data.
As noted, the quantities of different compounds vary by site.

11. Remove biomonitoring
The requirement to provide aquatic toxicity data and/or a biomonitoring program should be removed.
As explained elsewhere within this document, the Department does not agree.

12. If discharges are toxic, admixtures may not be the source of toxicity. Storm water containing wash-water from concrete and ready mix plants that use concrete admixtures is unlikely to pose aquatic toxicity risks from these admixtures due to the composition, chemical reactions, and their low initial concentrations of these products. Admixtures are used at .01 - .3 % solid by weight, and are bound to or react with hydrating cement, typically very tightly and often irreversibly.

13. The permit appears to assume that risks from discharges of wash-water from concrete plants would be associated with admixtures, and that additives would have a negative rather than positive impact on water quality. Comparisons with cooling water are inappropriate.

We have removed the requirement to cease using admixtures if toxicity testing is positive, and added the following:
Depending on the level and frequency of acute and chronic toxicity outcomes, the Department may require through written notification without reopening the permit a second round of testing to be performed during the third year of the permit. The Department may also reopen the permit as a major permit modification to establish additional permit conditions regarding biomonitoring or toxicity reduction evaluation. As the Department has consulted with industrial representatives on the permit, the Department will also consult with interested parties on the need to modify the permit.

14. Routine biomonitoring is not practicable and is cost-prohibitive. This is a research requirement which is not appropriate in a general permit. If chemicals have proven to negatively impact waters, MDE should establish regulatory threshold concentrations in effluent necessary to prevent such impacts. If any toxicity provision remains, it should be only for the toxic pollutants as defined under the Clean Water Act.
Whole effluent toxicity is not a research test, but a condition of a number of discharge permits. MDE cannot establish regulatory threshold concentrations on every chemical compound that is formulated. We believe the revised permit condition is practical.

15. A low to no discharge category should be established, so that facilities staying within those parameters do not needing biomonitoring, as evaluated on a site specific basis. Exempting facilities from toxicity testing only if they recycle all of their wastewater is not realistic, since there are users (including state facilities) that do not accept concrete with any reused water.
The permit has been reviewed to exclude from biomonitoring facilities that have not discharged during the past year, or are not expected to be in operation during the coming year. However, the specific impact of particular "low flow discharges" cannot be evaluated as part of the general permit process. Toxicity is dependent upon concentration as well as volume. A low flow

discharge with high concentrations of toxics would violate state regulations for whole effluent toxicity.

16. Are only concrete plants required to do biomonitoring? Does it apply to wastewater treatment additives?
This permit does not include biomonitoring requirements for wastewater treatment additives, although other permits require biomonitoring for wastewater containing treatment additives such as effluent from POTWs.. Considerably more information is available on treatment additives than on concrete admixtures, and sufficient non-toxic flocculants exist that the industry should be able to choose non-toxic wastewater treatment chemicals. If wastewater tests are positive for toxicity, the wastewater treatment additives may be investigated during the toxicity reduction evaluation.

17. The timeline for the biomonitoring requirement starts with permit issuance but should start with notification from MDE.
The change in permit language is consistent with the biomonitoring timeline in the permit, since MDE will not make a determination of whether discharges must be monitored.

D. Solids limits

No justification is offered for changing the method for wet weather sampling or limits. The permit change ignores improved settling systems in use today, and disregards strong industry compliance history. The proposed changes would require chemical additives (may have to add flocculants in conflict with pollution control initiatives). Permittees may be forced to use mechanical clarifiers (more energy and greenhouse gas emissions).
For wet weather sampling, we feel that halving the existing settleable solids standard to 0.25 ml/l would be more appropriate. Our employees already know this monitoring. Alternatively, the 100 mg/l TSS in the EPA Multi-Sector general permit for storm water could be used.
MDE reviewed the performance of existing facilities covered under the permit during the development of the proposed permit renewal. The facilities providing routine monitoring results met the discharge limits included in the permit. Improved settling systems should make the use of additional flocculants unnecessary. The majority of waters in Maryland are impaired for solids, so improvements to discharges are necessary, and results for total suspended solids are necessary to quantify the current solids loadings.

E. Storm Water Pollution Prevention Plans

1. Submission of two copies of a SWPPP is unreasonably burdensome, unnecessary, and will cause more problems than it solves. The requirement will increase administrative costs. It would be more economical to limit the obligation to those plans that are specifically requested. Submission of SWPPPs for MDE review and approval is unnecessary, since they are available to MDE upon request, and gets away from the idea of self-monitoring and self-management.
The NPDES program is based upon self-monitoring AND reporting, *with oversight.*

MDE has not asked for any paper copies of plans. Two copies were requested to satisfy industry concerns that some information in SWPPPs is confidential or must be withheld due to homeland security concerns. We have revised this permit condition to require only one version of the plan, which is suitable for public review, to be made available electronically.

2. The submission of two plans introduces the potential for confidential information mistakenly to be made public. SWPPPs are currently available for inspection and redacted copies can be made available upon request. This could cause an undue burden on the concrete producer with having to educate a member of the public that does not have the education or training in SWPPP.
We have revised this permit condition to require only one version of the plan, which is suitable for public review, to be made available electronically. The SWPPP shall also be available on site to MDE personnel. Most unedited plans will contain home telephone numbers and other private information.

If permittees would prefer to make this information publicly available on a company website, MDE will accept a website address instead of an electronic submission of a plan.

3. Plans are updated continuously as facilities are modified and chemical inventories and staff change. MDE would have inaccurate plans on file. Quarries, etc, involve movement of large amounts of overburden, product, and stockpiles. Submission is unworkable, since operations include frequent movement of overburden, material, product, etc, and sediment traps and storm water controls are planned with these changes in mind. The sediment and erosion control plan is already approved locally and by MDE's mining program. MDE shouldn't make the industry wait for another approval.
The SWPPP includes factors not covered in a sediment and erosion control plan, and not included in a Bureau of Mines review.

The changes sited are under the control of the permittee, who can plan in advance for the location of product and stockpiles. The SWPPP may be presented in phases, so that current and future, planned configurations may be addressed in the same document. Not all changes such as chemicals kept on site and staff changes must be reflected in a SWPPP, but more broad information like storage areas and conditions, current lines of responsibility, and training schedules for staff are very important.

4. Has MDE considered the policy ramification of this requirement and whether similar requirements will be included in different general permits?
MDE has included language in the construction general permit to allow public review of sediment and erosion control plans prior to registration under the permit. In addition, MDE is planning similar language in the industrial storm water general permit. These requirements are being encouraged on the federal level to increase transparency, and have been a factor in citizen complaints about other NPDES permits.

5. "Prior to submission of the NOI, a permittee shall prepare a SWPPP. It is not clear whether this applies to existing facilities with existing plans. If so, the administrative burden is significant and there is no apparent benefit to the environment.
As the language indicates, the requirement is for all permittees. Existing permittees should already have a SWPPP, since the current general permit required development and implementation of a storm water pollution prevention plan upon the date of coverage. MDE is intent on providing the public with appropriate assurance that the plans have been developed. If existing plans continue to represent site conditions and management practices, the applicability of the plan may be confirmed; if existing plans must be changed to represent current conditions, an environmental benefit will result. New or first time plans for facilities that have previously been permitted will also potentially improve water quality.

6. The phrase "coverage under the permit is conditioned upon implementation of the SWPPP" is not clear, undermines the permit and represents an attempt by MDE to expand its enforcement opportunities. Plans in MDE's possession will appear to be tacitly approved.
SWPPPs have been an essential requirement of the permit for the past fourteen years. This provision of the permit has been rewritten as follows: "Coverage under the permit requires implementation of the SWPPP."
This language does not alter the importance of the plan or MDE's enforcement authority.

F. Shale, dimension stone
Clarify that the permit applies to shale and dimension stone
We've added dimension stone and shale to stone, sand and clay in the definition of mine, the statement about process wastewater that is not required to be monitored if the discharge is to the ground, and to the descriptions of discharges from quarries that must be monitored.

G. General

1. The permit does not include a definition for concrete admixtures. Do they include pigments and fibers?
Yes.

2. Does the definition of waters of the state include sediment ponds or intermittent drainage on private land?
The definition of waters of the state is somewhat site specific.
a. If the sediment pond is dry, it is not waters of the state.
b. If the pond was created by damming a natural waterway, it is waters of the state.
c. If the sediment pond was created for wastewater treatment, and was not created by damming a natural waterway, it is not waters of the state.

3. Please confirm that the hosing down of vehicles to remove mud only is an eligible discharge.
Part I.B. "Applicable Discharges" lists washing of concrete mixer trucks and mixing equipment. The hosing of vehicles to remove mud is also an eligible discharge, within the limits on each of the discharge limitations pages.

4. Part I.E.6. states that "The Department may terminate coverage under this general permit for an existing permittee after providing 30 days notice if the Department finds that:…g. any other good cause exists for denying coverage under this permit." The permittee should be informed of the cause before the permit is denied.
This section discusses the circumstances under which the Department may terminate coverage under the general permit. This is general language and will not be modified. The termination of general permit coverage is an administrative decision, and does not preclude the application for and issuance of an individual permit for the same facility, so appeal procedures are not included in this section.

5. Our facility seldom discharges, so it doesn't make sense for us to monitor the flow.
We require monitoring of flow, and include this provision in every permit.

6. We need further information to understand how much our fee could be reduced and under what circumstances.

The language has been revised to state that fee reductions will be based upon reductions in impervious surfaces:

> Part III. C.3. Any permittee making facility modifications to reduce paved surface areas, collect and divert roof runoff, and incorporate vegetated buffers between such areas and natural waterways in the SWPPP may be entitled to a fee reduction equivalent to the percentage of impervious surface eliminated for each year after the first year of the permit. The permittee shall submit before and after photographs and site plans documenting changes made to the Department at least 90 days before the anniversary date of the permit.

7. Our air permit requires wet suppression to minimize fugitive dust generation.

The wet suppression system is covered by this permit, and will require monitoring if it has a separate discharge.

8. This represents an "end run" around the complicated permitting process for individual facilities discharging into specified bodies of water by imposing water quality based effluent standards for toxic pollutant discharges. Affected facilities must guess what MDE is trying to do and are not given the procedural protections provided by effluent standard setting.

No facility owner is required to apply for the general permit if s/he would prefer to be covered by an individual permit, so the procedural protections are available to all dischargers. The general permit must be protective in as many cases as possible to be useful to the Department, and reflects both the many Maryland waters that have water quality based limits and many waters that are impaired.

9. MDE should not require monthly submission of DMRs, but quarterly. Monthly DMRs effectively make the average limit the maximum limit, making Maryland most stringent.

While one report is required for each month, the DMRs must be sent in each quarter. '

The permit has been modified so the monthly average limit applies only if there are more than two discharges during the month, or one discharge that lasts three days or more. The existence of a maximum and an average limit means that if a regularly discharging facility has one high sample during the month, another sample may be taken and averaged with the first sample, giving the facility the potential to meet the permit limit in spite of one high result. A comparison of limits in several states with general permits for non-coal mines is included in the fact sheet.

10. Shouldn't MDE be pursuing electronic submission of DMRs?

We are looking at electronic submissions, and will accept them as soon as we are technically able to do so.

11. Submitting annual flow values for billing should not be necessary, MDE should have this information already

The existing permit requires permittees to update this information with modification requests, however, these are frequently not submitted until after bills are received based upon previously reported flows. The submission of this information by permittees is standard procedure.

12. Is the permit in effect as soon as we submit the application and pay the fee?

The permit is in effect as of the effective date on its first page, but coverage under the permit for any facility is effective when the permittee receives a letter from MDE as described in Part I.F.

"Coverage under this permit is effective on the date that the NOI is accepted by the Department and the fee is paid to the Department in accordance with the terms stipulated in Part III below. A person who submits such an NOI, who is notified in writing of its acceptance by the Department, who complies with the terms and conditions of this permit, and who pays the required fee is authorized to discharge under the terms and conditions of this permit. ("in writing" was added for clarification).

13. The proposed changes are broad and significant enough that MDE should provide training and communication on the new permit.
Comment noted.

14. Logging daily rain gauge data should be required only at operational facilities. NRMCA suggests that rain gauge readings only be required for the 24-hours preceding a sampling event or an alternative data source such as local weather monitoring stations be allowed.
This permit requirement was changed in response to concerns expressed to us in July. The permit published in November requires that the permittee "record the precipitation on the day of wet weather monitoring in a log that shall be made available for inspection by Department personnel, or shall indicate upon submission of the NOI the name and location of a weather station within ten miles of the facility from which s/he shall use the recorded rainfall in every instance." This condition is unchanged in the final determination.

15. The limitation of weather stations within 10 miles of a facility is unnecessary. Web-based data sites are not that specific about all points of monitoring and as long as they provide coverage for the specific area of the facility in their precipitation mapping the data should be deemed sufficient.
Precipitation varies considerably over even short distances. As noted, web-based data sites are not very specific, so if the data is not collected near the location of the facility, it may not be relevant.

17. Why was the deadline pushed back from 30 to 60 days? Fast turn around time is vital
60 days reflects more realistically the amount of time necessary for MDE to complete the paperwork for permit registration.

18. Outfall identification sending a copy to two separate departments at MDE is confusing. This requirement was not included in the permit that was published in November.

19. Freeboard should be defined.
The following definition has been added: **"Freeboard"** means the height above the water level and below the overflow level of a pond or other structure.

20. Withdraw the tentative determination.
The comments received do not warrant that type of outcome.

21. In some sections of the permit, records must be maintained for five years, in other cases three. This should be consistent.
The requirements reference federal regulations, which require the maintenance of application related materials for five years and the maintenance of monitoring results for three years. For consistency, any permittee may choose to maintain all records for five years.

22. While MDE may enter our property at any time, they must first stop in our office to announce their presence to comply with safety requirements.
The permit language for right of entry at Part IX.A. is preceded by "upon the presentation of credentials", which necessarily requires that the inspector contact the permittee.

23. This section is environmentally unsound and should be rewritten. This requirement causes us to break a hole in the side of the impoundment to create a discharge so that we can achieve a monthly sample so that MDE has something to regulate.

"Outfall Design …If discharge is not by a discreet conveyance, such as a pipe, the permittee shall install a trap, weir, or any other appropriate alteration that will allow retrieval of effluent samples."

There is no intent for anyone to "break a hole in the side of the impoundment to create a discharge so that we can achieve a monthly sample". MDE agrees that sediment traps with weirs are a better environmental solution than discharge pipes if they are properly constructed and maintained. The requirement is to create a place where one can retrieve an effluent sample after the water has flowed over the spillway or emerged from a filter berm.

24. Fact Sheet

The Department is obligated to provide supporting documentation and data for changes to general discharge permits. It is required to include with a tentative determination "a fact sheet…describing the class of discharges to be regulated, outlined in the proposed permit conditions and limitations"
A fact sheet was developed and sent to industry and environmental contacts on May 28, 2009. A revised fact sheet has been completed to reflect the revised permit conditions, and is posted on our web site at
http://www.mde.state.md.us/Permits/WaterManagementPermits/water_applications/AMines.asp.