Susquehanna River Basin Commission (SRBC)
Water Quality Advisory Committee (WQAC) Meeting Minutes

U.S. Geological Survey (USGS) Office
215 Limekiln Rd
New Cumberland, PA

September 23, 2009
10:00 a.m.

A. Introduction and Opening Remarks (Dave Heicher, SRBC)

Dave Heicher, SRBC, opened the meeting with introductions (see Participant List in Attachment A). The WQAC usually meets twice each year, in spring and fall.

B. Lower Susquehanna Source Water Protection Project and Early Warning System Improvements (Andrew Gavin, SRBC)

Andy Gavin, SRBC, gave an update on the Lower Susquehanna Source Water Protection Project (SWP) and Early Warning System (EWS) improvements. SRBC will be involved in the development of individual source water protection plans for over 20 systems in the Lower Susquehanna Subbasin, development of a Lower Susquehanna Subbasin SWP Strategy, and enhancement and expansion to the Pennsylvania portion of the EWS.

The U.S. Environmental Protection Agency (USEPA) and Pennsylvania Department of Environmental Protection (PADEP) require the following minimum elements for source water protection: steering committee and public participation, SWP area delineation, contaminant source inventory, SWP area management and commitment, contingency planning, and new sources. SWP plan development will depend on steering committees and public participation and will include source delineation and contaminant inventory refinements, as well as a management/implementation plan. Strategy development could include a regional partnership framework throughout the subbasin, identification and prioritization of regional issues (such as pollutants, critical conditions, etc.), and a regional implementation plan.

The EWS has been in operation since 2003. The EWS enhances drinking water protection efforts. It measures pH, temperature, and turbidity at public water supply intake locations with real-time data transmission to monitor rapid changes in water quality. Four stations have organic contaminant detection capabilities. Staff wants to add additional stations and parameters, as well as enhance and develop an analytical tool for time-of-travel and contaminant tracking. SRBC is interested in forming partnerships with water suppliers, federal/state agencies, county/municipal planning, watershed/citizen organizations, and regional organizations like PA Rural Water and the Lower Susquehanna Center for Land and Water. In 2006, New York provided funds for EWS expansion into that portion of the Susquehanna River Basin.

SRBC completed the New York expansion for the Elmira/Binghamton intakes in summer 2009. In addition to the standard parameters, dissolved oxygen, conductance, and organics detection have been added. SRBC also installed "stand-alone" remote monitoring stations upstream of the New York intakes and was able to measure for the additional parameters mentioned above. SRBC has been able to apply the knowledge from New York to upgrade equipment and parameters at several Pennsylvania stations, some in partnership with the Susquehanna Heartland Coalition. Staff is working to standardize data transmission/management modules for ease of implementation at new stations. SRBC currently operates nine stations and is hoping to have the online web interface completed by the end of 2009. The four new stations measure temperature, conductance, pH, dissolved oxygen, turbidity, and water depth. One station is powered by a solar panel. The data are transmitted by a cell modem.

C. Marcellus Shale Water Quality Considerations (Dave Heicher, SRBC)

Dave Heicher, SRBC, gave an update on Marcellus shale water quality considerations in the Susquehanna River Basin. Dave prepared a draft matrix (spreadsheet) at the request of SRBC's Maryland Commissioner, Dr. Robert Summers, after the last WQAC meeting via webinar. This matrix lists the regulatory controls in place to protect water quality during Marcellus shale gas well development in the Susquehanna River Basin. At the request of Pennsylvania, Dave agreed to accept comments until October 16. An updated version of the matrix is attached.

Andy Gavin, SRBC, gave an update on SRBC's remote water quality monitoring network proposal. SRBC proposes to implement a network designed to remotely monitor water quality conditions to maintain and protect surface waters in select portions of the basin. It would take some of the technology used in the EWS. The monitoring network would utilize state-of-the-art monitoring and communication technology to collect and transmit real-time water quality data. The proposal would help monitor areas affected by the increasing demands of the natural gas industry. The Water Resources Management (WRM) Division at SRBC handles SRBC regulatory approvals needed for the natural gas companies to use water in the basin. Contact Mike Brownell, chief of the WRM Division, with any questions on the proposal.

D. Bathymetry and Sediment Storage Capacity Above Conowingo, Holtwood, and Safe Harbor Dams (Mike Langland, USGS)

Mike Langland, USGS, gave an update on the Lower Susquehanna River Reservoir System Bathymetry study completed last summer. The reservoirs have been filling with sediment and associated nutrients, reducing capacity for sediment storage. Approximately 55-60 percent of the sediment and 40 percent of the phosphorus are being trapped. The revised estimate given in 2001 is 25-30 years of remaining sediment storage capacity. At capacity, sediment and phosphorus loads may increase significantly to the upper Chesapeake Bay. The project objectives included collecting bathymetry data to update and map bottom-surface

profiles, providing updated estimates of remaining capacity for sediment storage, and providing information useful to consider appropriate management options.

There are three reservoirs in the Lower Susquehanna River system: Safe Harbor Dam, Holtwood Dam, and Conowingo Dam. York Haven Dam, located farther upstream, has no significant sediment storage capacity. There has been long-term monitoring in the Susquehanna River system, so we are able to see a significant decrease in sediment loads from 1900-1999. However, from 2000-2008, there was a slight increase: an average of 4.3 million tons of sediment in and 1.2 million tons of sediment out, averaging 72% trapped.

Total deposition of sediment above Safe Harbor Dam in Lake Clarke was about 92 million tons in 2008. Total deposition behind Holtwood Dam in Lake Aldred was 14 million tons in 2008. Total deposition in the Conowingo Pond behind Conowingo Dam is 174 million tons.

Overall, there is room for about 30 million tons of sediment until storage capacity is reached in the Conowingo Pond. Predictions are for steady state to be achieved in 15 to 20 years. However, if future changes are added, the number of years could be increased. If transport is decreased from 4.2 to 2.5 million tons per year, four more years could be added. Five more years could be added due to statistically expected scour removal. If the trapping efficiency could be decreased to 55 percent, four more years could be added. With all of these changes, the time period for steady state to occur may increase to 25-35 years. USGS encourages bathymetry to be conducted more frequently.

USGS will continue to work with other federal and state agencies and partners to consider possible solutions. The U.S. Army Corps of Engineers (USACE) is considering a new study, which Anna Compton discussed in the next item. Mike also mentioned reconvening the Sediment Task Force (first convened in 2001) and considering some of their solutions, including removing reservoir sediment, reducing sediment transport from source areas, and using floodplains to dissipate stream energy and store sediments.

E. USACE Sediment Behind the Dams Study (Anna Compton, USACE)

Anna Compton, USACE, gave a presentation on the USACE sediment behind the dams study. USACE got involved in the original sediment study in 1999 when SRBC formed the Sediment Task Force. USACE was given authority to study shoreline erosion and related sediment management measures that could be undertaken to address the issue of sediment behind the dams. The original reconnaissance phase had two parts: Part 1 was sediment behind the dams on the Lower Susquehanna River, and Part 2 was Chesapeake Bay shoreline erosion.

SRBC and USACE had scoped a cost-shared, traditional feasibility study in fall 2003 estimated at $2 million. Options for use or disposal of dredged material would have been studied and compared. A No Feasibility Cost Sharing Agreement was signed, and the study was not initiated. However, current USGS estimates have Conowingo Dam reaching steady state in 15-20 years (not including scour events). USACE is looking for cost-sharing partners, and is

reconvening the Sediment Task Force in late October. USACE has had conversations with the Engineering Research Development Center (ERDC) to learn about the different tools, applications, and models available to help answer questions.

USACE is holding the Sediment Task Force meeting on October 29, 2009. The agency would like to secure a sponsor by December 2009 and have a signed agreement for the study by May 2010. The Feasibility Phase would start in August 2010.

F. Lunch

G. Chesapeake Bay TMDL and Executive Order Implications and Opportunities (Rich Batiuk, Chesapeake Bay Program)

Rich Batiuk, USEPA Chesapeake Bay Program Office, gave an update on the Chesapeake Bay Total Maximum Daily Load (TMDL). He said it will be one TMDL broken into 92 segments. Maryland, Virginia, Delaware, and Washington, D.C. have listed most of these 92 tidal water segments as impaired. All six watershed states (Pennsylvania, New York, West Virginia, and those listed above) must help achieve the prescribed sediment and nutrient diet for each of these Bay tidal water segments. For example, Maryland will have 51 TMDLs–one for each Bay tidal segment. Each TMDL will address all sources within the watershed directly draining into each respective tidal Bay segment.

Rich explained the watershed implementation plan expectations and sequencing. Plan development and model runs will be performed from October 2009 to June 2010, and then plan details will be put into draft waste load allocations (WLAs) and load allocations (LAs). The final TMDL will be established by December 2010. USEPA will have two-year milestones for reporting, modeling, and monitoring from 2011 to 2025. Rich said that the actual court order deadline for the TMDL is May 2011.

USEPA will issue final watershed implementation guidelines and hopes to have agreement with the partners on new nutrient jurisdiction-based target cap loads by the end of October 2009. The agency will issue more detailed descriptions of consequences for not meeting TMDL requirements by mid-November. The first round of public meetings will be held November to January, and the states will work with local governments and stakeholders to implement the TMDL. The states and local government will develop watershed implementation plans by May 2010. Public meetings for the draft TMDL will be held June to September 2010, and the final TMDL will be established by December 2010.

Rich also mentioned a series of seven federal agency reports (under President Obama's Executive Order) on water quality, targeting resources, stormwater and federal facilities, climate change, public access and conservation, monitoring and decision support, and habitat and research for living resources. There is a link to these reports on the Chesapeake Bay Program's web site at http://executiveorder.chesapeakebay.net/. Rich talked about some key points under the water quality report, such as following the new accountability program with the Bay TMDL,

achieving pollutant reductions through regulations, permits, or enforceable agreements, and proposing new/expanded consolidated animal feeding operation (CAFO), stormwater, and source rulemakings.

Rich said there were three ways that the WQAC could be involved with the Bay TMDL. First, members could get informed, stay involved, and participate in upcoming public meetings. Members also could work with the three watershed jurisdictions and federal partners to do what is best for the Susquehanna River, as well as keep a critical eye on issues unique to the river (sediment behind the dams, legacy sediments, acid mine drainage (AMD)).

H. Maryland Antidegradation Strategy for Protection of High Quality Waters (Matthew Rowe, Maryland Department of the Environment (MDE))

Matt Rowe, MDE, gave a presentation on the Implementation of Maryland's Antidegradation Policy. The Clean Water Act (CWA) can be thought of as a "three-legged stool" of designated uses (such as recreation, trout fishing, etc.), criteria to support uses, and antidegradation policy. Maryland's antidegradation regulations state that water quality better than the minimum criterion shall be maintained. The regulations also define assimilative capacity for high quality waters, as well as discharge and water and sewer plan amendments to waters designated as high quality. An antidegradation review must first consider a no discharge alternative. It also must consider discharge modifications to limit the use of the assimilative capacity. Lastly, it must perform a social and economic justification if a particular discharge will degrade a Tier II segment. Maryland currently has 223 designated high quality stream segments that were identified using Maryland's Biological Stream Survey (MBSS) data (fish and benthic).

MDE developed GIS screening tools such as online and PDF maps on its web site, as well as a Tier II Geodatabase compatible with ArcGIS. These tools will help determine if the activity specified in a particular permit application will be located in an area draining to a Tier II stream segment. MDE has been doing internal outreach, such as brown bag lunches with key permitting programs, and external outreach, such as targeted mailings to planning, economic development, and public works directors throughout the local jurisdictions. MDE has also performed targeted monitoring by identifying new Tier II segments, increasing coverage in "hot spot" areas, and enhancing baseline information statewide. MDE developed permit guidance elements such as minimum 100 foot stream buffers, environmental site design, baseline (and five years post-construction) biological and flow monitoring as permit requirements, phasing, pollution prevention, and land use change thresholds.

MDE is revising regulations to increase clarity and better define scope of regulatory authority. Matt mentioned pilot studies performed with three local jurisdictions to better understand their planning processes and identify outreach points. MDE might include NPDES general construction permits in future regulations. A GIS land use change tracking tool to determine cumulative impacts also is being considered.

I. American Eels Do Everything Backwards–American Eel Restoration in the Susquehanna River Basin (Steve Minkkinen, USFWS, Maryland Fishery Resources Office)

Steve Minkkinen, U.S. Fish and Wildlife Service (USFWS), gave a presentation on American eels. Eels are the only catadromous (migratory, spawning in salt water) species on the East Coast, and do everything "backward" from the anadromous (migratory, spawning in fresh water) species. Immature eels hatch from eggs spawned in the Sargasso Sea, ride the Gulf Stream north, and then ascend North American rivers and streams, where they grow into adults. Concern over eels started when commercial eel landings started to decline in the 1970s. USFWS reviewed the petition submitted to add eels to the Endangered Species Act and determined that listing was not warranted.

Dams on the Susquehanna River block migration of eels. Fish passage on the river has been designed for anadromous species like shad and river herring that move upstream as adults and prefer high flows and daytime migration. These passage methods are ineffective at passing juvenile eels because eels travel in slow water, are smaller, and migrate at night to avoid predators. Steve mentioned that the three dams are up for FERC relicensing over the next five years, and that eel passage is an important issue.

Eels are apex predators that feed on almost everything in the river. Freshwater mussels (eastern elliptio) use eels to complete their life cycle. Mussel larvae attach to eels and are carried upstream, where the larvae detach and drop to the bottom to mature as adults. Lack of eels above dams may be limiting mussel populations. Mussels live fairly long lives (over 100 years) and can improve water quality by filtering out nutrients and sediments.

USFWS has started sampling eel populations downstream of the Conowingo Dam. USFWS also has been working with USGS to study the relationship between eels and mussels in the Susquehanna River to confirm the eels as the primary hosts of eastern elliptio (and possible hosts for other species). Over the last few years, USFWS has conducted experimental eel introductions in river tributaries above the dam. The fish were immersed into antibiotics for six hours so they would be identifiable by UV light if re-captured. USFWS stocked approximately 15,000 elvers in Conowingo Creek in 2009 and will stock for two more years. Fourteen sites were sampled in the Susquehanna with one control site in the Potomac River. Qualitative and quantitative surveys were performed, and mussels found in quantitative surveys were identified and measured. Steve believes that eels are important to eastern elliptio reproduction and that this hypothesis should be tested in areas where there is currently no recruitment (such as Buffalo Creek and West Branch Pine Creek). Future studies could include increasing elver captures below Conowingo Dam, stocking eels in upstream tributaries, determining if eels can move through Conowingo Pool, determining optimal size of eels as a freshwater mussel host, and considering downstream passage issues.

J. Use of Lime Silo Dosers for AMD Treatment on Bear Run (Tom Clark, SRBC)

Tom Clark, SRBC, gave a presentation on the use of Swedish bucket lime silo dosers for AMD treatment on Bear Run. Bear Run is a 19.3 square mile subwatershed of the West Branch Susquehanna River located in Indiana, Clearfield, and Jefferson Counties. Much of the watershed is inside state game lands 174, and is very rural with an extremely small watershed population. Most of the pollution in Bear Run is from AMD. SRBC is the first recipient of a Watershed Renaissance Grant Award from the Commonwealth of Pennsylvania which is going to allow this watershed to be completely restored.

There are several treatment alternatives for Phases V–VIII of the Bear Run project. With no treatment, Bear Run continues to be impaired. With passive treatment, there is a risk of malfunction due to heavy acidity and aluminum loading. With active treatment, there are high operational costs. The Swedish bucket lime dosing system is considered to be a combination of passive and active treatments because it has the benefits of both treatments while lessening the risks and costs. The silo allows a direct relationship between the lime dose amount and flow. It uses no electricity, only the power of the water flow. The maintenance is minimal, easy, and cheap because the dosing system only has three moving parts. The silo has a small footprint of approximately 100 square feet. It also minimizes thermal pollution.

Tom explained how the Swedish bucket system was tested before implementation on Bear Run. A one-ton test unit was borrowed from Environmental Dosers and installed on the Banks Coal #1 Discharge, which has water quality similar to the Phase V–VIII discharges. The test unit was filled with a half ton of hydrated lime and a datalogger was installed a quarter of a mile downstream on Murray Run. The test ran from May 11-18, 2009, and the doser was online May 13-18, 2009. A video of the doser is available online at http://2009.treatminewater.com/images/DStammLimeDoser.pdf (slide 6 of the 37MB PDF file).

From the test, staff concluded that the doser method was a viable technique for discharges with high acidity and metals. The lime dosage amount could be scaled back to a quarter ton per week for the Banks #1 discharge treatment, which would cost about $1,440 a year. The lime reaction does increase the temperature of the discharge slightly, but the majority of the lime dispensed seems to be dissolved.

Staff compared costs for the Swedish bucket system versus passive treatment. Passive systems are usually sized for a 25-year life span. Based upon calculations, the doser seems to be less expensive for treatment of Phases V–VII, especially based on 25-year calculations. A doser costs approximately $100,000 to install, and the yearly costs are lower. However, the discharge needs to have appropriate elevation and distance from the stream to allow proper mixing. The silo also needs to be easily accessible for lime delivery trucks, and be as inconspicuous as possible to reduce vandalism.

Tom believes that the Swedish bucket system is possibly the best solution to treat high acidity and metal mine discharges in Pennsylvania. The Swedish bucket system can also be used for remediation of acid rain impaired streams. More testing will need to be done, but the systems are already in use in the Upper Potomac River in Maryland and have yielded good results in

those headwaters. There are annual costs, but those should be the same every year. The dosers are also made in Brookville, Pa.

K. Activities of Others and Open Discussion (All)

Dave asked meeting participants to send any comments on the Marcellus shale spreadsheet to him by October 23, 2009. Dave will send the meeting minutes to the committee members and meeting participants when completed, as well as proposed 2010 meeting dates.

Attachment A

Participant List

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Regulatory Controls to Protect Water Quality During Marcellus Shale Gas Well Development in the Susquehanna River Basin

	Agency	Statutory/ Regulatory Authority	Activity Regulated	Problems/Comments/Regulatory Gaps
Federal	U.S. Environmental Protection Agency (USEPA)	Clean Water Act (CWA)	Oversight of programs delegated to states for discharge of pollutants to surface water bodies pursuant to 40 CFR Section 123.1, The National Pollutant Discharge Elimination System (NPDES), Section 301(a) of the Clean Water Act, 33 USC Section 1311(a) which prohibits the discharge of any pollutant by any person from a point source into waters of the United States, and 40 CFR Section 122.	Established effluent limitation guidelines (ELGs) for oil and gas extraction, which were published in 1979, and can be found at 40 CFR Part 435. Developed a stormwater permitting program (Phase 1: 1990; Phase II: 1999) in accordance with Section 402(p), which was added to the Act in 1987. Section 402(l)(2) specifies that USEPA and the states shall not require NPDES permits under the CWA for uncontaminated storm water discharges from oil and gas exploration, production, processing, or treatment operations, or transmission facilities.
	USEPA	Energy Policy Act of 2005	The Energy Policy Act of 2005 modified the Section 402(l)(2) exemption of the Clean Water Act by defining the excluded oil and gas sector operations to include all oil and gas field activities and operations, including those necessary to prepare a site for drilling and for the movement and placement of drilling equipment.	

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Agency	Statutory/ Regulatory Authority	Activity Regulated	Problems/Comments/Regulatory Gaps
USEPA	Safe Drinking Water Act	USEPA sets national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants. In addition, USEPA regulates the underground injection of brines and other fluids in Class II wells, which are associated with oil and gas production. USEPA runs this program in New York and Pennsylvania, which do not currently have state primacy.	Class II wells may be used to inject water and other fluids into oil- and gas-bearing zones to enhance recovery, or they may be used to dispose of produced water. The regulation specifically prevents disposal of waste fluids into formations that serve as underground sources of drinking water.

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Agency	Statutory/ Regulatory Authority	Activity Regulated	Problems/Comments/Regulatory Gaps
U.S. Department of Transportation	Hazardous Material Transportation Act and Hazardous Materials Transportation Uniform Safety Act	Regulates transportation of hazardous chemicals found in fracturing additives and has also established standards for containers.	
Applicable agency dependent on the activitiy	National Environmental Policy Act	Requires that natural gas exploration and development on federal lands be analyzed for environmental impacts. Dependent on the level of agency involvement, may require preparation of an Environmental Impact Statement (EIS) or Environmental Assessment (EA).	

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	Agency	Statutory/ Regulatory Authority	Activity Regulated	Problems/Comments/Regulatory Gaps
New York	N.Y. State Department of Environmental Conservation (NYSDEC)	State Environmental Quality Review Act	Required preparation of a Supplemental Generic Environmental Impact Statement (SGEIS) that provides a comprehensive review of the potential environmental impacts of large water volume/horizontal oil and gas drilling and production and how they are mitigated.	GEIS includes discussion of water withdrawals, use of additives in hydraulic fracturing fluid, space and facilities required at the well site to ensure proper handling of water and additives, removal and ultimate disposition of spent fracturing fluid, and potential impacts at well sites where multiple wells will be drilled during a 3-year period.
	NYSDEC	Clean Water Act (federal), New York State Environmental Conservation Law (ECL)	Issues permits for discharges to ground water and surface water bodies (see comments column). In addition, Article 23, Title 3 of the ECL authorizes NYSDEC to require that wells be drilled, constructed, operated, and plugged, and the surrounding land reclaimed, to prevent or remedy the escape of oil, gas, brine, or water out of one stratum into another and the pollution of fresh water supplies by oil, gas, salt water, or other contaminants. Flowback water from wells is also regulated by NYSDEC, which also requires that a Drilling and Production Waste Tracking Form be completed and maintained by generators, haulers, and receivers of flowback water. 6 NYCRR Part 608 enables NYSDEC to control any change, modification, or disturbance to streams. Also, actions located within 100 feet of wetlands regulated by Article 24 of the ECL generally require a permit from NYSDEC.	New York State has a program which has been approved by USEPA for the control of wastewater and stormwater discharges in accordance with the Clean Water Act. Under New York State law, the program is known as the State Pollutant Discharge Elimination System (SPDES) and is broader in scope than that required by the Clean Water Act in that it controls point source discharges to groundwater as well as surface water. USEPA retains authority for the Underground Injection Control (UIC) Program. Nonetheless, a SPDES permit is needed to dispose of wastewater via an underground injection well. Site-specific SEQR review is required for the use of brine disposal wells. NYSDEC general permits for stormwater runoff require operators to develop, implement, and maintain up-to-date Stormwater Pollution Prevention Plans. These plans include the requirement to maintain a running inventory of hydraulic fracturing additive products present and used on the site.

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	Agency	Statutory/ Regulatory Authority	Activity Regulated	Problems/Comments/Regulatory Gaps
Pennsylvania	Pennsylvania Department of Environmental Protection (PADEP)	Clean Water Act (federal), Pennsylvania Clean Streams Law	Issues National Pollutant Discharge Elimination System (NPDES) permits for discharges to surface water bodies.	PADEP has delegation from USEPA to issue NPDES permits under the Clean Water Act. PADEP also has authority under the State's Clean Streams Law to issue wastewater discharge permits. USEPA retains authority for the pretreatment program and the UIC Program. As with all other NPDES permits, PADEP plans to issue discharge permits for Marcellus Shale wastewaters with effluent limits that are protective of water uses in the stream such as aquatic life uses and potable water supplies.
Maryland	Maryland Department of the Environment	Clean Water and Air Acts (federal), Code of Maryland Regulations	Applicable permitting authorities in Maryland may include: Oil and Gas exploration and Production Permit, NPDES Industrial Discharge Permit, wetlands license, water appropriations permit, and an air quality permit for construction. Also, a federal permit is required for transmission of the gas produced.	Likely the biggest problem will be finding resources at the state level for effective compliance and enforcement. Instream monitoring and analysis should be a requirement for larger projects. With respect to stormwater, if a project disturbs more than 5,000 square feet of land area and involves greater than 100 cubic yards of earth movement, the project sponsor is required to submit an erosion and sediment control plan to the local jurisdiction, or to the State of Maryland if the project is on state land. If the project disturbs more than 5,000 square feet of land area, the project sponsor also must apply for an NPDES general permit for stormwater discharges associated with construction activity.
Other	Susquehanna River Basin Commission (SRBC)	Susquehanna River Basin Compact (P.I. 91-575), the SRBC Comprehensive Plan for the Water Resources of the Susquehanna River Basin, and the Commission's Project Review Regulations (18 CFR Part 806)	Considers impacts on aquatic habitat and water quality associated with water withdrawals. Water withdrawal reporting is required, and withdrawals may be limited or prohibited during low flows to protect the aquatic environment and downstream users.	SRBC docket conditions state that SRBC approval shall not exempt the project sponsor from obtaining all necessary permits and/or approvals required for the project from other federal, state, or local government agencies having jurisdiction. SRBC reserves the right to modify, suspend, or revoke the docket action if the project sponsor fails to obtain or maintain such approvals.