

January 27, 2026

Pennsylvania Department of Environmental Protection
400 Market St.
Harrisburg, PA 17101

Re: [Draft 2026 Integrated Water Quality Monitoring and Assessment Report](#)

Background

Protect PT (Penn-Trafford) is a nonprofit based in Harrison City, Pennsylvania. We ensure residents' safety, security, and quality of life by engaging in education and advocacy to protect the economic, environmental, and legal rights of the people in Westmoreland and Allegheny counties. Today, I am writing on behalf of our members.

In order to support the rights of our members, we regularly monitor and observe streams in our service area. We utilize various tools to measure basic water parameters, following consistent procedures. We submit these comments as community members who maintain familiarity with the conditions of local streams. Thank you for the opportunity to comment on this report.

Introduction

The comments below are based on repeated observations and measurements conducted in surface waters of SW PA. This data is based on regular visits to a set of sites in publicly accessible areas. Our comments are organized according to stream segments. We are not currently submitting our data to DEP. We are happy to share any information that gives our comments below context, including instrument specifications and sampling protocols.

- pH and conductivity measurements have been collected using a YSI Sonde EXO 3 model
- PFAS levels were collected and analyzed with the Cyclopure brand PFAS field kit
- IC and ICP-MS lab methods were used to analyze water chemistry at the Stolz lab at Duquesne University

Stream segments and comments

Pucketa Creek and tributary

Segments: 123972352, 123972348, and tributary segment 123972356

Pucketa Creek is currently identified as supporting aquatic life. We have repeatedly collected samples from segments 123972352, 123972348 in sterilized bottles and submitted them to the Stolz laboratory at Duquesne University for IC and ICP_MS analysis. On multiple occasions our results suggest that the aluminum levels of the streams may exceed the US EPA 2018 National Recommended Aquatic Life Freshwater Acute and Freshwater Chronic Criteria for aluminum (see the table below). We are aware that a true evaluation of this would require concurrent measurements of pH, total hardness, and DOC, as these influence bioavailability. We urge DEP to perform the appropriate tests at these sites to determine if the current assessment that these stream segments are not impaired is correct.

Segment	Date	Aluminum (ppb)	pH	PFAS
123972352	7/26/2023	277	N/A	N/A
123972352	3/27/2024	154	8.8	94 total ppt, PFOS 51.9
123972352	5/15/2024	58	8.8	0 total
123972348	3/27/2024	205	8.8	0 total
123972348	5/15/2024	76	9.0	N/A
123972348	7/26/2024	162	8.1	2.7 total

We have also regularly measured PFAS levels, which we are aware is not currently part of the criteria evaluated in the CWA report. However, these may be helpful as an indicator of possible causes of impairment.

- In the 10 samples collected from segment 123972352: 9/10 contained PFAS; levels ranged from 1.3 - 94.0 ppt
- In the 9 samples collected from segment 123972348: 8/9 contained PFAS; levels ranged from 1.1 - 14.4 ppt

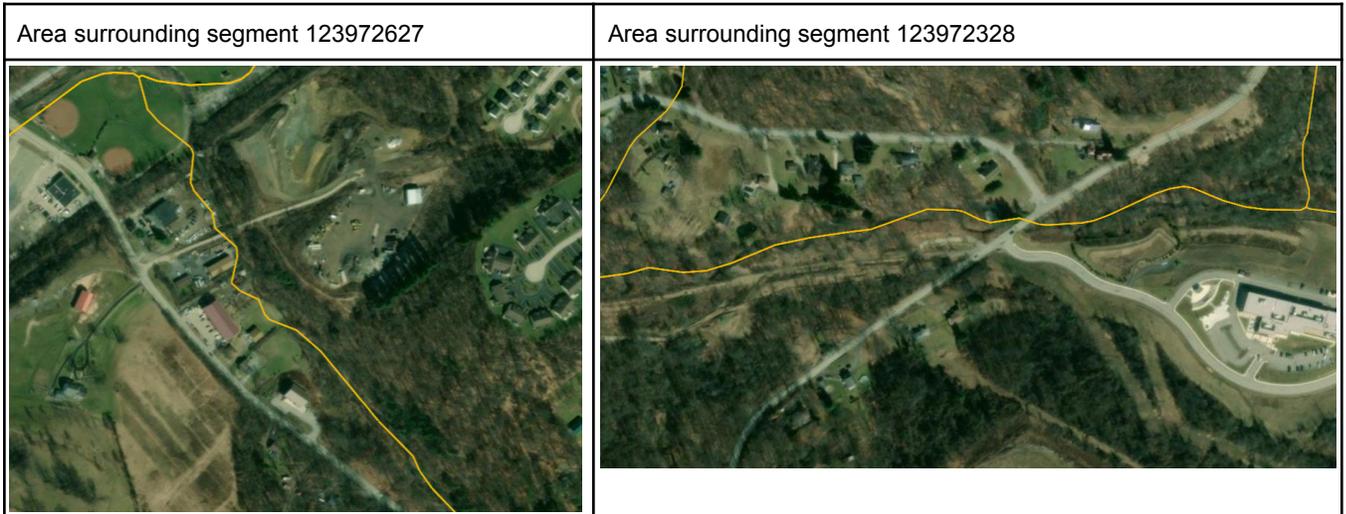
During monitoring visits to the above segments, we regularly observe an unnamed tributary to Pucketa Creek (segment 123972356). It is currently listed as impaired by "Nutrients." It is not clear if this designation accounts for heavy siltation of this stream. On multiple occasions we have observed a heavy layer of fine light colored sediment coating this streambed and streambanks. Below are pictures from 8/21/2025 that illustrate this. We ask DEP to consider this observation when determining future necessary sampling or monitoring that must be done to evaluate the cause of impairment.



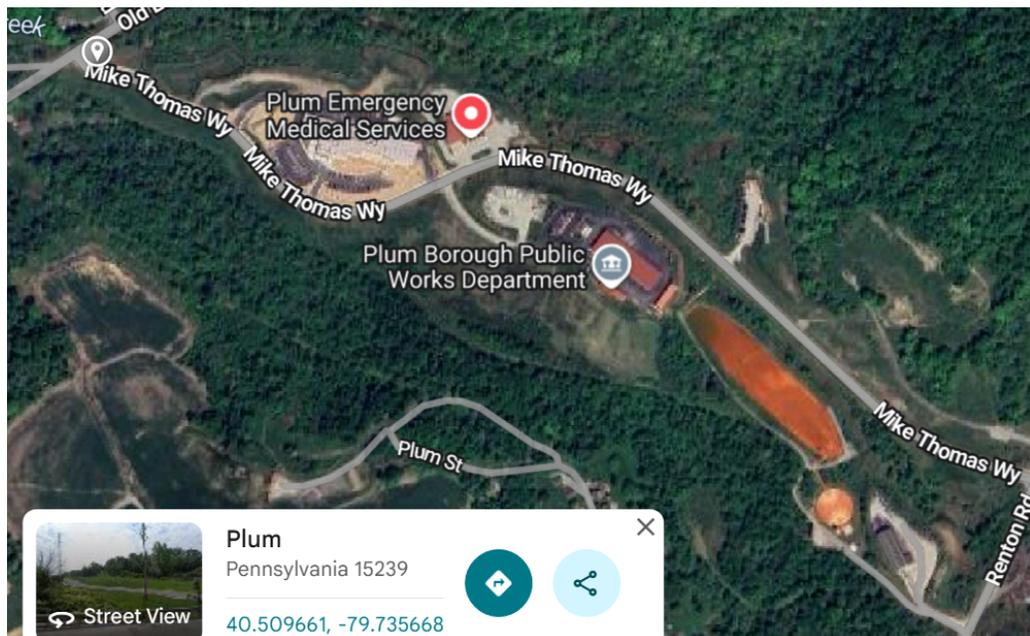
Little Plum Creek

Segments: tributary segment 123972627, 123972328, tributary segment 123973067

These segments are all listed as impaired, but sources and causes have changed. In the 2026 report, segments 123972627, 123972328 both are listed as being impacted by “URBAN RUNOFF/STORM SEWERS.” However, as can be seen in the satellite images below, the area around these segments is minimally developed or hardened. Thus, we question this source designation.



Regarding segment 123972328 of Little Plum Creek, the new cause is listed as “Habitat Alterations” and “Siltation.” We collected multiple samples from this segment. When analyzed by the Stolz laboratory, results from a sample collected on 10/25/2022 showed high Sulfate levels (502 ppm). A later sample collected on 7/26/2023 showed high Chloride (2035 ppm) and Sulfate (3709 ppm) levels. This may indicate other sources of impairment. In the image below, our sample site is to the upper left (marked by a grey, circular marker). It is possible that materials stored in the facilities upstream are impacting this segment, and this source deserves evaluation.



Regarding segment 123973067 of the unnamed tributary to Little Plum Creek, the previous source of “ACID MINE DRAINAGE” has been removed. A sample collected on 7/21/2022 and analyzed via IC and ICP_MS methods showed elevated Aluminum (60 ppm), Manganese (4 ppm), Iron (20 ppm) and Sulfate (772 ppm) levels. This is consistent with AMD sources and we suggest that this source may still be active and should not be removed until DEP does further testing of this segment.

Speers Run

Segments: tributary segment 99409794

We monitor segments of Speers Run out of concern for a trackrecord of mismanagement at the nearby Westmoreland Sanitary Landfill (WSL). This landfill has received several violations for mismanagement of leachate that resulted in pollution of waters of the commonwealth. This is especially concerning because this landfill accepts unconventional oil and gas waste, which impacts the chemical composition and toxicity of leachate.

The unnamed Tributary to Speers Run (segment 99409794) is currently listed as impaired due to pH levels as a result of AMD. This segment is located directly across from the landfill and is fed largely by a culvert that drains runoff from WSL. This culvert has received leachate pollution during episodes that have resulted in violations. Our regular visits to this site since 2023 agree with DEPs finding of AMD impact through: low pH values (4.8-6.2); high conductivity measurements (1311-2165 $\mu\text{s}/\text{cm}$); and elevated levels of Sulfate, Aluminum, Manganese and Iron.

Site ID	Date	Total PFAS (ppt)
WSL#1	10/10/2023	185.1
WSL#1	2/16/2024	23.6
WSL#1	4/23/2024	19.8
WSL#1	6/21/2024	26.6
WSL#1	8/14/2024	8.1
WSL#1	10/17/2024	0
WSL#1	12/13/2024	5.8
WSL#1	3/6/2025	43.7
WSL#1	5/15/2025	36.7
WSL#1	7/24/2025	25.3
WSL#1a	9/29/2025	9.6

We also collect samples for PFAS analysis at this segment. PFAS, as a manmade contaminant, is not indicative of AMD. As shown in the table to the left, analysis of our samples have often shown results that are higher than background levels typical in Pennsylvania streams. Because this segment is known to have been repeatedly impacted by landfill leachate, and because PFAS is a common chemical component of landfill leachate, assigning AMD as the sole source of impairment may not be fully representative of the sources that are impacting this stream. We encourage DEP to conduct further testing of this segment to determine if other sources are contributing to its impairment.



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On behalf of Protect PT and our members, thank you for your consideration. If you have questions or comments, please contact me at yvonne@protectpt.org or call (724) 392-7023.

Sincerely,

A handwritten signature in blue ink that reads "Yvonne Sorovac".

Yvonne Sorovac
Protect PT
Environmental Scientist

A handwritten signature in blue ink that reads "Gillian Graber".

Gillian Graber
Protect PT
Executive Director