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File Code: 2500

Date: December 28, 1999

California Regional Water Quality Control Board, Central Valley Region  
c/o Steve E. Rosenbaum, Senior Engineering Geologist  
3443 Routier Road, Suite A  
Sacramento, CA 95827-3003

**COMMENTS CONCERNING  
TENTATIVE ORDER REVISING WASTE DISCHARGE REQUIREMENTS  
WALKER MINE TAILINGS, PLUMAS COUNTY**

Dear Mr. Rosenbaum.

Enclosed is a copy of our comments concerning the tentative order revising Waste Discharge Requirements (WDRs) Order no. 91-017 for the Walker Mine Tailings. I understand that this tentative order is not yet draft and has not been sent out for public review. I am submitting the enclosed comments for your review and to enable you to continue working with Mr. Terry Benoit of this office.

Analysis of the required water quality data collected under the existing and previous Orders is ongoing and will become a part of the amended Record of Decision (ROD) for treatment of the site. Completion of this supplemental report is expected in early January, after which we'd like to meet with you to discuss the results of the analysis and treatment options at the site. Although it is not anticipated that this new information will specifically affect changes to the revised Order, it could generate new information that may affect the Monitoring and Reporting Program.

Please direct questions and comments to Terry Benoit at (530) 283-7822 or  
Email: [tbenoit/r5\\_plumas@fs.fed.us](mailto:tbenoit/r5_plumas@fs.fed.us).

Sincerely,

*Mark J. Madrid*  
MARK J. MADRID  
Forest Supervisor

enclosure  
cc: DR, BRD  
Rose Miksovsky, OGC

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**COMMENTS REGARDING  
TENTATIVE ORDER REVISING WASTE DISCHARGE REQUIREMENTS  
WALKER MINE TAILINGS  
USDA FOREST SERVICE, PLUMAS NATIONAL FOREST  
December 28, 1999**

The following comments refer to the tentative order revising Waste Discharge Requirements and Monitoring and Reporting Program sent by Steve Rosenbaum of the California Regional Water Quality Control Board, Central Valley Region to Terry Benoit, USFS, and Neal Brody, ARCO, dated 1 December 1999. Suggested changes are italicized.

Tentative Waste Discharge Requirements

P1, para 4, line 4: The ROD was signed in June 1994, not April. April is the date the ROD was prepared.

P1, para 5, line 2: "...tailings from the mill were deposited in a *constructed* basin..."

P2, para 7, line 2: "...such as leakage through the levee *that separates* Little Grizzly Creek *from the tailings area*."

P2, para 12, line 2: "The first *approach* of the ROD *is* to provide additional ..."

P2, para 13, line 1: "The ROD *evaluated* diversion of..."

P3, para 13 and 14, last sentences: Delete or re-write the sentence. Additional action can be required without being specific.

P3, para 14, line 1: "The second *approach* of the ROD *is* to reduce erosion and..."

P3 and 4, para 18, lines 7 and 8: Only Little Grizzly Creek is utilized for "preservation and enhancement of cold water fisheries", while both are utilized to "preserve and enhance wildlife".

P4, para 21: "The *general* beneficial uses of groundwater *in the State of California* are domestic and municipal, agricultural supply, and industrial supply."

None of these uses apply to the groundwater in the tailings. The contamination of deep groundwater in the area by water from the perched water of the tailings has never been asked and there's no evidence that it's occurring. In fact, water seeping along the base of the tailings and into Little Grizzly Creek does not contain any of the contamination constituents tested for except iron. Some or most of this iron may be from the meadow/wetlands originally located at the confluence of Little Grizzly and Dolly Creeks

before the tailings pond was constructed and filled. Iron is a common metal released naturally from meadows and other wetlands in this area.

P5, "C. Receiving Water Limitations", para 1: The limitation for copper is lower than the original tentative draft. Was there a re-calculation? The footnote describing the effects of hardness and displaying the EPA equations is missing from the table and appears only in the "Information Sheet" at the end of the document.

This brings up the question of including iron as a water quality limitation constituent. Since the primary ore body constituent causing acid formation is not a pyrite of iron, but of copper, is there evidence that iron concentrations released from the tailings area is not at naturally occurring levels? In addition, a review of past several years of data indicates that iron concentrations at the compliance station did not exceeded the prescribed limitations. If the only concern is the formation of iron precipitate deposits on channel substrate material, then there's no evidence that iron is causing problems. The only iron precipitates that form are very localized floculants that quickly break up and wash away where water flows are noticable and, of course, during high flow events. There's no noticable, long-term accumulation of iron precipitates in Little Grizzly Creek.

P7, para 2, line 1: "The Discharger shall *also* comply with the reporting requirements..."

P7, para 4: Does this paragraph apply to this site? Release of contaminants from the site has been a long-term problem with no immediate solutions. Release of contaminants is currently persistent but, with treatments in place, this release is expected to subside gradually.

P8, Compliance Schedule, tasks A and B: We may not be able to meet the year 2000 due date for "submitting a proposed in-stream biotoxicity assessment program" and "submitting a workplan for diversion of Dolly Creek..." because the Unilateral Administrative Order (UAO) we're working on to recouperate past and future costs will take several more months to complete. A more realistic date would be year 2001, same months.

P8, Compliance Schedule, task D: We don't expect "full compliance with Receiving Water Limitations" for at least 30 years. By 1 October 2008 we do expect *Operational* compliance.

#### Tentative Monitoring and Reporting Program

P1, table "Surface Water Monitoring Points", R-6: "Settling pond *culvert outlet* adjacent to Little Grizzly Creek."

P2, para 1: A set of samples in a high flow month and one in a low flow month over the 5 year term of the WDR should give us sufficient data points, along with that previously collected, to give us an indication of compliance and trends. I recommend that we sample in May or June, whichever month we can first access the site, and again in September, generally the lowest flow month. Flows in October are not that much more than August's and there have been years when snow prevented us from accessing the site in October.

Flows drop rapidly after the snowmelt season so that by June flows are beginning to run low, or at least moderately low. If you believe that we need at least three data points per year, then we should sample during high, moderate, and low flow months, or May, June, and September. If June is the first month we can sample due to access problems, then June, July, and September could be the sampling months.

P2, table "Surface Water Monitoring Parameters": Why is "Sulfate" added? We've not been testing for this constituent except during the annual large array of constituent testing in May and sulfates have always been none detectable.

Both "Suspended Sediment and Settleable Solids" are not included as in the current WDR Monitoring Program. I agree that they are not needed, but I think we can substitute something more meaningful, such as pebble counts. I recommend we conduct an annual pebble count at permanent cross-sections both upstream of the confluence with Dolly Creek on Little Grizzly Creek (R-4 or near R-6) and at the compliance station. Enclosed is a copy of the Wolman Pebble Count citation and methodology.

Pp2 and 3, "Groundwater Monitoring": I still question why we would want to monitor water held in hazardous waste material. It seems that we will always find the contamination constituents above limitation levels. If you believe we must sample, then we should reduce the monitoring to three wells once a year during the low flow month of September. I recommend W-3, W-5, and W-7(the background well).

Attachment B: Background well, W-7, is not shown. It's located near the tailings and just below the "B" in "Beckwourth-Taylorville Rd."

