



**GUADALUPE RUBBISH
DISPOSAL CO., INC.**

P.O. Box 20957
San Jose, CA 95160
(408) 268-1670
(408) 268-7451 Fax

July 11, 2011

Sent via electronic mail; no hard copy to follow

Carrie M. Austin
Environmental Engineer
Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay St., Suite 1400
Oakland, CA 94612

**Re: Addendum - inventory eroding mercury mining wastes - response & map now due
July 13, 2011; Guadalupe Rubbish Disposal Company, San Jose California.**

Dear Ms. Austin:

Pursuant to your June 20, 2011 email request for a response and map addressing questions from the Regional Water Quality Control Board, San Francisco Bay Region, on the topic of "Evaluation of Mining Waste Erodibility", GRDC is pleased to submit the following three (3) files in response to this request.

The files included are titled as follows:

- 1) Holman Response to Questions
- 2) GRDC cult res map
- 3) Surface Distribution Stantec

Please feel free to contact me if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "William Spence". The signature is fluid and cursive, with a long horizontal line extending to the right.

William Spence

Guadalupe Rubbish Disposal Company



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Acting Secretary for
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>

Edmund G. Brown, Jr.
Governor

June 20, 2011
WDID No: 243S007368
CIWQS # 717685

Sent via electronic mail: no hardcopy to follow

Guadalupe Rubbish Disposal Company, Inc.
ATTN: William Spence, District Manager
P. O. Box 20957
San Jose, CA 95160
WSpence@WM.com

SUBJECT: ADDENDUM TO DECEMBER 23, 2010 TECHNICAL REPORT:
EVALUATION OF MINING WASTE ERODIBILITY, UNNAMED PROSPECT
RESPONSE AND MAP DUE JULY 1, 2011

Dear Mr. Spence:

This letter provides Water Board staff comments on the April 18, 2011 addendum to the December 23, 2010 report by Stantec, *Report on Erosion of Mercury Mining Waste (Addendum)*. We find this addendum partially complete, and require that a written response and map be submitted by July 1, 2011. Please call Carrie if you need an extension to this due date.

Please respond to the following questions on the Archeological Survey (Exhibit P):

1. What information from the Archeological Survey should the Water Board keep confidential? Specifically, we propose to include the following pages as attachments to tentative orders posted on our website: both front and inside cover pages, pages i, 34 [Summary only], 37, and Map 4.
2. Summary p. 34: Where on Map 3 were the three additional locations to the south?
3. Summary p. 34: Where on "sketch map" in Appendix C are the following indicated, "north additional mining shafts and tunnels might extended [*sic*] along the ridgeline and down the other side of the hill"?

We compared Map 4 from Appendix C (Study Area, Features and Loci Recorded, and Terraformed Areas at Southern Part of 15999 Guadalupe Mines Road, San Jose) to Figure 4 from Stantec's December 2010 Report (Surface Distribution of Mining Wastes). From this comparison, it appears that two "loci" from the Archeological Survey are also outside the area that Stantec reported on in 2010. These are Loci 21 (tailings piles) and 35 (part of the town of Guadalupe... flat terrace was once larger and has been reduced through mining and erosions...). Therefore, we additionally

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request that a map be prepared that merges the Archeological Study sites (Map 4) onto Stantec's Figure 4, which shows both mining waste areas previously mapped, and areas where stormwater BMPs are/will be constructed.

If you have any questions, or if you need an extension to this due date, please do not hesitate to contact me at 510 622-1015, or via e-mail at CAustin@waterboards.ca.gov.

Sincerely,

Carrie M. Austin, P.E.
Environmental Engineer

cc w/Attachments:

Waste Management, Inc.
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James D. Ponton, Senior Geologist, Water Board TMDL Program Manager
Keith Lichten, Senior Engineer, Water Board Enforcement Section
Lindsay Whalin, Engineering Geologist, Water Board
Laurent Meillier, Engineering Geologist, Water Board



holman & ASSOCIATES
Archaeological Consultants

"SINCE THE BEGINNING"

3615 FOLSOM ST. SAN FRANCISCO,
CALIFORNIA 94110 415/550-7286

30 June 2011

Tay Peterson
Senior Project Manager
TRA Environmental Sciences, Inc.
545 Middlefield Road, Suite 200
Menlo Park, California 94025

Re: Responding to California Regional Water Quality Control Board Letter of 20 June 2011
Concerning 15999 Guadalupe Mines Road, San Jose, Santa Clara County.

Dear Tay:

This letter addresses three questions from California Regional Water Quality Control Board (Austin 2011) concerning the information presented in an archaeological survey report for the above referenced project that was submitted by Holman & Associates.

Question 1. What information from the Archeological Survey should the Water Board keep confidential? Specifically, we propose to include the following pages as attachments to tentative orders posted on our website: both front and inside cover pages, pages i, 34 [Summary only], 37, and Map 4.

All but Map 4 can be posted. Instead of Map 4, Map 1 could be used to identify the study area, but not the specific locations of each of the features or loci. Archaeological site location information, and detail descriptions of the features or loci should not be disseminated to the general public or posted on the California Regional Water Quality Control Board's website to deter vandalism and looting, Map 4 along with most of the details in the survey report should be limited to those individuals with a need to know basis for the project.

Question 2. Summary p. 34: Where on Map 3 were the three additional locations to the south?

Map 3 is a 1917 view of the general study area. Two clusters of six buildings or structures, and to the southeast, a single structure are all situated south of Guadalupe Creek and Hicks Road. These are the three locations that are marked on Map 4 as ". . . beyond the study area" and south of the gray line marking the study area boundary of Guadalupe Creek.

Question 3. Summary p. 34: Where on "sketch map" in Appendix C are the following indicated, "north additional mining shafts and tunnels might extended [sic] along the ridgeline and down the other side of the hill"?

The sketch map on page 5 of 10 of Psota 2011:Appendix C shows where known features and loci are situated within the 100-acre study area. While historic-era maps and previous archaeological investigations conducted on portions of the land north of the district boundary identified additional

mining activities, it was beyond the scope of this project to identify any specific remaining features and loci in this area. That is why the boundary is a tentative one, periodically marked by question marks. In contrast, the three loci south of the study area contain fencing and structures that are visible from Hicks Road and document a known continuation of mining activities associated with this district with remnants still visible. The recording of this mining district and defining the boundaries are consistent with the Northwest Information Center of the California Historical Resources Information System's policy for historic archaeological districts and were created in consultation with Leigh Jordan that facility's Coordinator and Site Records Coordinator.

The map that combines Archeological Study sites Map 4 onto Stantec's Figure 4 should also be considered confidential and distributed to people only with a need to know basis.

Thank you for this opportunity to respond to the previous questions.

Sincerely,

Sunshine Psota, M.A., Register Professional Archaeologist
Senior Historical Archaeologist

References

Austin, Carrie M., P.E.

2011 Addendum to December 23, 2010 Technical Report: Evaluation of Mining Waste Erodibility, Unnamed Prospect Response and Map Due July 2, 2011. Letter dated 20 June 2011. California Regional Water Quality Control Board, Oakland.

Psota, Sunshine

2011 *Archaeological Survey of an 100-Acre Southern Portion of 15999 Guadalupe Mines Road near San Jose, Santa Clara County, California*. Holman & Associates, San Francisco. Prepared for TRA Environmental Sciences, Menlo Park.

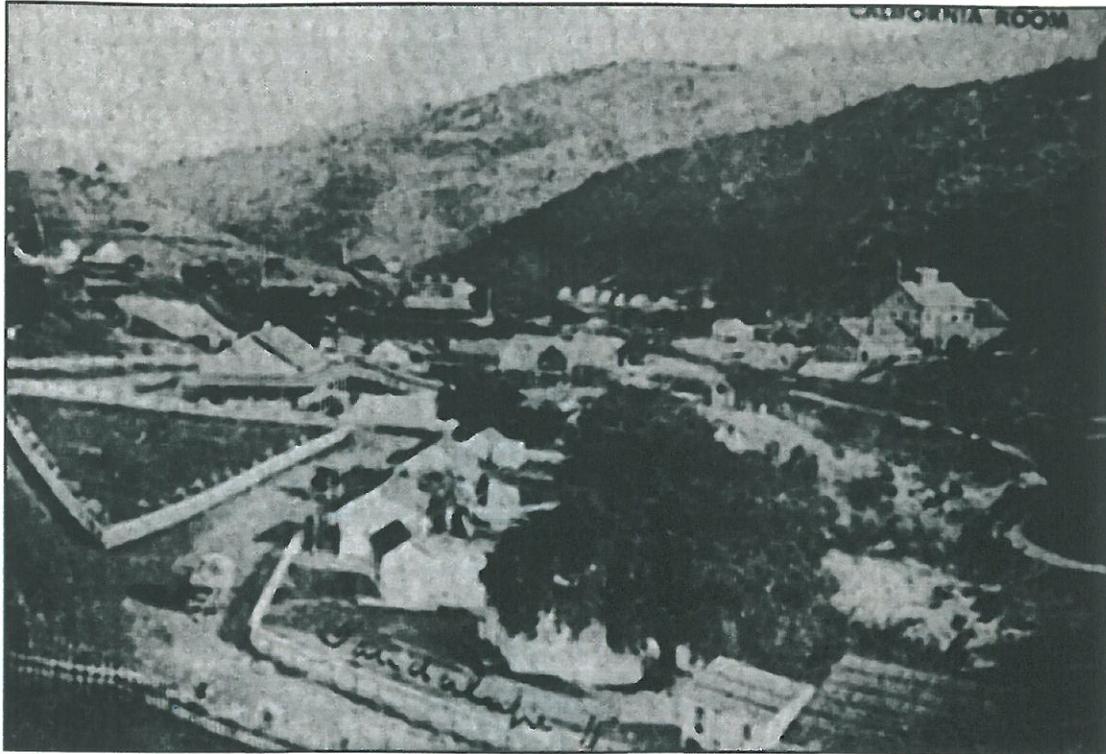
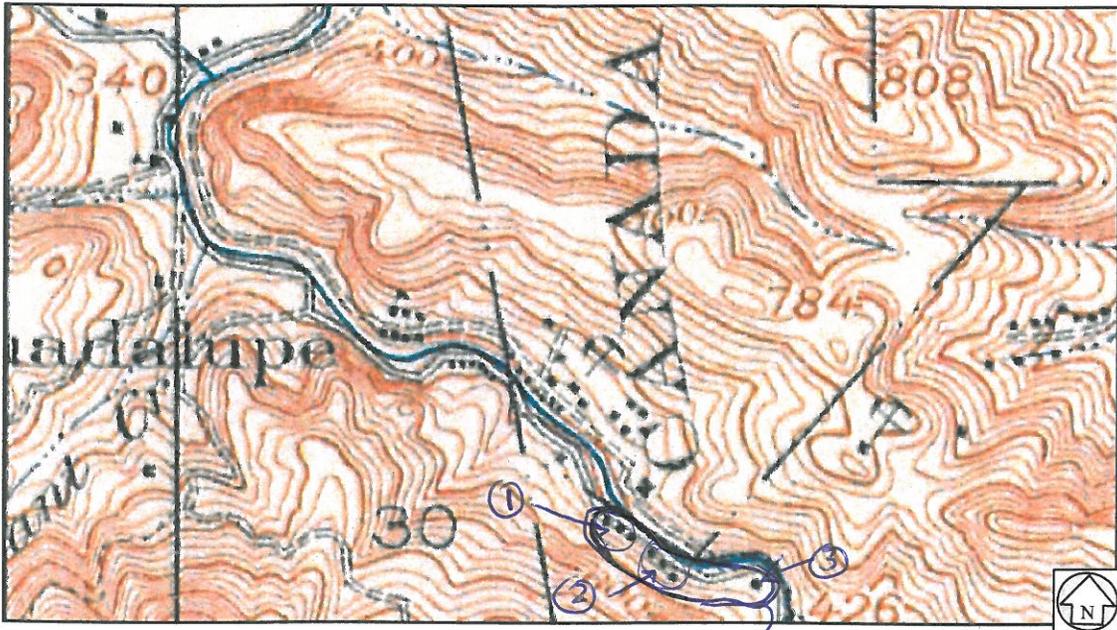


Photo 3. Overview of Guadalupe and the Guadalupe Mines, date unknown but attributed to circa 1875 (Anonymous n.d.). View is looking southeast with residences and commercial buildings in front and center, the main engine shaft at center far right, and the processing area in the back center. This perspective provides a very different view than all the other overall photographs of the town and mines.



Map 3. A 1917 view of the study area showing the remaining buildings and areas that were currently mined. Mining symbol to east (left) of eastern boundary marked the nearby Senator Mine, a part of New Almaden Mines (USGS 1917). right

→ the three locations marked on Map 4 as "...beyond the study area." They are off property, south of Guad. Ck.