CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD COLORADO RIVER BASIN REGION

ORDER NO. 87-80

WASTE DISCHARGE REQUIREMENTS
FOR
AMERICAN GIRL MINING CORPORATION
North of Ogilby - Imperial County

The California Regional Water Quality Control Board, Colorado River Basin Region, finds that:

- American Girl Mining Corporation (hereinafter also referred to as the discharger), P.O. Box 6426, Yuma, Arizona, 85364, submitted a Report of Waste Discharge, dated May 22, 1987, for a heap-leach mining operation.
- 2. The discharger proposes a gold and silver extraction operation by heap cyanide leaching 4 million tons of ore for approximately 10 years. The ore heap would be continually sprinkled with a solution that contains 0.4 grams per liter of sodium cyanide (NaCN), and lime (CaO) for pH control. The solution would leach through the ore dissolving the gold and silver before draining into a pregnant solution containment basin. The solution would then be piped through carbon column units, where the precious metals would be removed. The remaining barren solution would drain into a tank where cyanide would be added to bring the concentration of the solution to the appropriate strength before it is recirculated onto the pile. The processing site is to be located in an unsurveyed portion of T15S, R21E, and in Section 25 and 26, T15S, R20E, SBB&M, which is about 3 miles north of Ogilby in Imperial County.
- 3. Up to four million tons of ore will be leached on one large leach pad. The ore to be leached will be underlain by a continuous synthetic (or equivalent) liner designed to be effective throughout the processing life of each pile or segment. The liner design would be based on: (1) the size of the ore particles in the initial life, against the liner, (2) maximum pile height, (3) ore placement methods, (4) subgrade preparation and/or overliner procedures, and (5) provisions for controlling the hydraulic head of the solution on the liner.
- 4. Upon completion of the ore-leaching process, each pile or segment would be flushed with fresh water, or otherwise rinse-treated, to reduce cyanide concentrations to a mining waste classification of Group C, Article 7, Subchapter 15, Chapter 3, of Title 23 California Administrative Code. The pile would then be either abandoned in place or moved elsewhere.

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- 5. Normal annual precipitation in this area is 3.5 inches, and normal annual surface evaporation is 9 feet.
- 6. The Water Quality Control Plan for the Colorado River Basin Region of California was adopted by the Regional Board on November 14, 1984. The beneficial uses of the ground waters of the Amos-Ogilby Hydrologic Unit, as set forth in the above plan, is municipal supply. The depth to bedrock in the project area is between 100 and 150 feet. More than 20 drill holes have been drilled at the project site to delineate the ore body. These cores were drilled between 350 and 550 feet. The Regional Board has copies of the drill logs in its files. The drill logs show that no ground water was encountered in any of these drill logs. For this reason, ground water monitoring wells would not be practical for this project. The industrial water supply for this project is derived from a well which is located approximately 2 miles to the southwest of the property.
- 7. Overburden soil and rock and waste rock from the mining operations would be deposited in piles surrounding the mining pits. These materials have the classification of Group C per Article 7 of said Subchapter 15, based on laboratory tests on crushed rock which show that the material is not acid generating or hazardous and would not cause a discharge having a significant effect on water quality.
- 8. This site is subject to Waste Discharge Requirements adopted in Board Order No. 86-63, which was for pilot operations.
- 9. The Board has notified the discharger and interested agencies and persons of its intent to revise waste discharge requirements for this facility.
- 10. The Board in a public meeting, heard and considered all comments pertaining to the proposed discharge.
- 11. The U.S. Department of the Interior, Bureau of Land Management, has prepared an environmental assessment dated August 17, 1987 in accordance with the provisions of the National Environmental Policy Act (42, U.S.C. Section 4321 et. seq.) and in compliance with the State Guidelines under the California Environmental Quality Act (Chapter 3, Title 14 California Administrative Code). This environmental assessment is in compliance with all C.E.Q.A. requirements and indicates that this project would not have a significant effect on water quality. The State Clearinghouse number for this document is 87081903.

IT IS HEREBY ORDERED, the discharger shall comply with the following:

A. Discharge Specifications

 Neither the mining process nor the discharge of wastewater or other wastes shall create a pollution or a nuisance as defined in Division 7 of the California Water Code.

- 2. The cyanide solutions shall be contained only in the processing system or in other leak-proof containers.
- 3. There shall be no wind transport of cyanide solution or ore containing cyanide away from the leaching area.
- 4. The heap leach ore pile shall be underlain by a synthetic liner which has a maximum permeability of 1×10^{-10} cm/sec and a minimum thickness of 40 mils. An equivalent liner may be approved by the Regional Board's Executive Officer if the discharger demonstrates that the equivalent liner will function equal to or better than the above specified minimum system.
- 5. Each cyanide solution containment basin, shall be underlain by a double liner with a leachate collection and removal system installed between the two synthetic liners. Each synthetic liner shall have a permeability which does not exceed 1 x 10⁻¹⁰ cm/sec. Each liner shall have a minimum thickness of 40 mils. Each basin shall contain a leak detection system and withdrawal sump. The double liners with leachate collection and removal system shall extend up the sidewalls to at least the following heights (vertical) above the maximum working depth of the cyanide solution and/or sludge contained therein:
 - a. 2.0 feet as regards basins
 - b. 1.3 feet as regards transport ditches (except as required in Specification No. 8, below).

The remaining sidewalls of both basins and truck transport ditches shall have a single 36 mils reinforced weather-resistant synthetic liner, or an equivalent liner approved by the Regional Board's Executive Officer. Other design details for protection of the quality of State waters shall also be approved by the Executive Officer.

- 6. The processing area shall be protected from any run-on, washout, or erosion which could occur as a result of a storm having a predicted frequency of once in 100 years, and based on time of concentration at the processing area, as set forth in Department of Water Resources Bulletin No. 195 for El Centro, Blythe and Hayfield, California and Yuma Arizona. The average value shall be taken from these four reporting stations.
- 7. The heap leach processing area shall be bermed, and capacity in the aboved described containment basins shall be provided to impound all storm water drainage from the piles and from the cyanide solution collection and transport facilities during a maximum probable one-hour storm, as set forth in Department of Water Resources Bulletin No. 195 for El Centro, Blythe and Hayfield, California and Yuma, Arizona. The average value (5.0 inches) taken from these four reporting stations is to be used. In addition, containment capacity shall be provided

for 24 hours of cyanide solution draindown from the piles. Also, standby emergency facilities shall be available to assure continual circulation of the leaching solution if at any time it is determined that a planned processing configuration or rate could in an emergency result in flow in excess of existing basin storage capacity. The additional storm storage capacity shall be provided before the new processing configuration is started.

- 8. The impoundment area berms and containment basins shall provide at least two feet of freeboard above the storage volumes required in Discharge Specification No. 7, above.
- 9. There shall be no discharge of process wastewater at any location without prior approval from the Regional Board.
- 10. Adequate measures shall be taken to insure that liners will not be punctured for the duration of the leaching activity.
- 11. Leached ore residual shall not be placed in perennial, intermittent, or ephemeral stream channels unless provisions are made to divert runoff around the waste in a non-erosive manner. Waste shall not be placed where it can be eroded by streamflows or cause accelerated streambank erosion.
- 12. Prior to removal of leach ore residue from an impervious pad, for disposal, the cyanide contained therein shall be neutralized as described in Discharge Specification No. 16, below.
- 13. Ore residue may be abandoned on a pad, provided the cyanide in the ore is neutralized as described in Discharge Specification No 16, below.
- 14. All industrial waste materials not covered by said Article 7, Subchapter 15 shall be discharged at a Board approved waste management unit. Any hazardous waste containers shall be rendered unusable prior to final disposal.
- 15. Adequate measures shall be taken to assure that unauthorized persons and mammals are effectively excluded from the processing area.
- 16. When abandoning leached ore residue, the procedure for determination of whether free cyanide (CN) in the ore residue has been neutralized to a satisfactory level shall be as follows:
 - a. A sampling grid of the ore pile or segment on the leach pad shall be submitted that is acceptable to the Executive Officer. The sampling grid shall contain a total of at least ten sampling locations on the ore pile or segment being abandoned.

b. The sample to be analyzed from each sampling location shall contain 100 grams as an aliquot of samples taken as set forth below, except that no sample shall be taken within three feet above the plastic liner unless special provisions are made to avoid penetrating the liner or for sealing said penetrations: 1. An ore pile thirty feet or less in depth shall have samples taken at 25, 50 and 75 percent of the depth. 2. An ore pile greater than thirty feet in depth shall have samples taken every ten feet of depth. c. The sample analysis procedure shall be as set forth in Attachment A. d. The maximum allowable free cyanide (CN) shall not exceed the following levels in the filtrate portion of a 5/1 extraction. 1. 90 percent of at least 10 samples shall contain less than 10mg/l free cyanide (CN') in the filtrate. 2. None of the samples shall contain more than 20 mg/l free cyanide (CN) in the filtrate. e. For any sampling location that indicates a free cyanide level in excess of 20 mg/l in the filtrate, the areal extent of the inadequately detoxified area shall be determined and detoxified so that the cyanide levels in that particular ore pile will comply with the limitations contained in Specification No. 16 (d) 1 and 2 above. 17. Adjacent and contiguous ore piles or segments shall also be sampled simultaneously when any pile or segment is to be abandoned. If any additional processing is done in the sampled areas, the piles and segments tested will require additional rinsing and testing prior to abandonment or removal. 18. The discharger shall maintain vadose zone monitoring system in locations as approved by the Executive Officer. 19. A device which measures the hydraulic head on the leach pad liner shall be installed at the point at which the hydraulic head is anticipated to be maximum. Provisions B. 1. At least 60 days(1) prior to commencement of construction of each of the above mentioned components of the facility, the discharger shall submit to the Board for approval by the Executive Officer a technical report which shall include a plan showing in detail the proposed construction of that component. (1) 60 days unless a lesser period is approfed by the Executive Officer.

- 2. At least 10 days prior to commencement of operations, the discharger shall submit to the Boards Executive Officer a certificate, signed by a California Registered Civil Engineer, stating that the pads, containment basins, leakage detection system, flood protection and attendant facilities, and disposal areas are constructed in accordance with the technical report as approved by the Executive Officer to meet the requirements of this Order.
- 3. At least 10 days prior to loading ore onto the pads, the discharger shall notify the Board to allow sufficient time to schedule a staff evaluation of construction and inspection procedures utilized by the discharger for liner installation.
- The discharger shall comply with "Monitoring and Reporting Program No. 87-80", and future revisions thereto, as specified by the Executive Officer.
- 5. Prior to any significant modifications in this facility which could result in material change in the quality or quantity of wastes discharged, or any material change in location of discharge, the discharger shall report in writing to the Regional Board allowing sufficient time for Board consideration and action.
- 6. The discharger shall submit to the Board, at least 30 days prior to commencement of the herein stated expanded operations, written adequate assurance that money is committed in an amount sufficient to insure detoxification of all cyanide, plus cleanup and closure of the processing site upon abandonment of facilities, in a manner that will not adversely affect water quality.
- 7. Lack of construction or operational activity on the site for a period of one year shall constitute abandonment for the purpose of this Order.
- 8. This Order supersedes Board Order No. 86-63.
- 9. The discharger shall install a device for testing the leak detection system of each double-lined containment structure. Said testing shall be subject to approval by the Executive Officer.

I, Arthur Swajian, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Colorado River Basin Region, on _____September 23, 1987_.

althu Swajen Executive Officer

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD COLORADO RIVER BASIN REGION

MONITORING AND REPORTING PROGRAM NO. 87-80 FOR AMERICAN GIRL MINING CORPORATION North of Ogilby - Imperial County

Location: Section 25 and 26, T15S, R20E, SBB&M

Monitoring and Reporting No. 1

The discharger shall submit to the Regional Board monthly reports containing the following:

- A. The current status of mining operations as to whether the operation is active or inactive.
- B. An estimate of the total amount of ore (tons) presently being processed.
- C. The amount of liquid collected in each seepage detection sump and the period of time since the last evacuation.
- D. Analysis for free cyanide and total cyanide of any water found in each seepage detection sump.
- E. Analysis for free cyanide and total cyanide for any liquid found in the vadose zone monitoring system.
- F. The amount of hydraulic head (inches) on leach pad liner. Readings to be taken weekly and the weekly average to be reported monthly.

Monitoring and Reporting No. 2

- A. Immediate reporting of any accidental spillage, leakage, or release of waste material, including immediate measures being taken to correct same and limit detrimental effects.
- B. Upon request from this Board's Executive Officer, the discharger shall furnish special technical and/or monitoring reports on the treatment and discharge of wastes, and on the integrity of the cyanide solution containment system.

- C. The discharger shall submit quarterly reports showing present and planned drainage parameters. These drainage parameters shall show compliance with Discharge Specifications A-7 and A-8 of this Board Order.
- D. At least 30 days prior to any proposed abandonment of leached ore residues or discharge of wastewater, or termination of the operation described in this Order, the discharger shall submit a copy of the results of analyses of the cyanide concentration in the leached ore residue and in the wastewater in accordance with Discharge Specification No. 16.
- E. Report of completion of cleanup of premises shall be submitted to the Regional Board in writing within one week following completion of work.

The above monitoring program shall be implemented and/or maintained immediately upon adoption of Order No. 87-44.

Quarterly reports shall be submitted to the Regional Board by January 15, April 15, July 15 and October 15. Monthly reports shall be submitted to the Regional Board by the 15th day of the following month. Reports for Item 2A, (above) shall be forwarded immediately and if at all possible shall be preceded by phone communication to the Regional Board's office, phone no. (619) 346-7491. Copies of the reports submitted to the Board pursuant to this Monitoring and Reporting Program shall be maintained at the operations site, and shall be made available to staff of the Regional Board upon request.

Mail reports to:

California Regional Water Quality Control Board Colorado River Basin Region 73-271 Highway 111, Suite 21 Palm Desert, CA 92260

ORDERED BY

September 23, 1987

Date

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD COLORADO RIVER BASIN REGION

ATTACHMENT A TO ORDER 87-44

FOR IONIC CYANIDE also know as free soluble cyanide

Description: Ionic cyanide and most weak complexes are soluble in distilled water. The strong complexes of ions, although normally soluble, are bound too tightly to the particle surface and are not solublized. The sample is leached with distilled water in a single pass, flow-through manner. The leachate is collected, alkalized for preservation, and made up to a definite volume. This leachate sample is then analyzed via "Standard Methods" 412 C or E. Method 412 D may not be used.

Apparatus:

Large glass funnel, the stem throat plugged with glass wool;

or

- 2) Large glass funnel with glass fiber filter paper: Whatman GF/C, 934-AH, or equivalent.
- 3) Balance capable of weighing to nearest 0.01 g.
- 4) 500 ml volumetric flasks.
- 5) Items necessary to perform cyanide analysis as described in narrative above.

Reagents:

- 1) 2.5 N NaOH (100 g NaOH/1)
- Reagents necessary to perform cyanide analysis as described in narrative above.

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Procedure:

Weigh out, to nearest 0.01 g, 100+1 g of sample as received. Place in glass funnel, either glass wool plugged or with filter paper. Add 50.00 ml of 2.50 N NaOH to 500 ml volumetric flask and place it so as to catch the filtrate from the funnel. Pour 50 ml of distilled (or deionized) water onto the solid sample and allow to percolate through. When liquid level is even with the top of the solids, add an additional 50 ml of water. Repeat the addition of water until a total 400 ml H₂O has been used. Make up volume in volumetric flask to mark with distilled water. This constitutes the sample ready for analysis.

The titrametric (412C) and the ion selective probe (412E) require no further preparation. The sample is then read directly by either titrametric (412C) or the ion selective probe (412E) and the results reported in mg/l (CN⁻).





