

**Addendum to the Fact Sheet for
State Waste Discharge Permit ST0005270
Hecla Limited**

1. General Information

Facility Name and Address	Hecla Limited, Republic Unit 190 Knob Hill Drive, Republic, WA 99166
Type of Facility	Closed Gold and Silver Mining and Milling
Type of Treatment	Storage and evaporation of collected mine water and seepage from the Aspen tailings pond

2. Application and Compliance Review

Hecla Limited (Hecla) submitted an application to Ecology on January 22, 2015 for permit reissuance, and Ecology accepted it on March 12, 2015. Ecology reviewed inspections and assessed compliance of the facility's discharge with the terms and conditions in the previous permit. Ecology has sufficiently reviewed the application, discharge monitoring reports, and other facility information in enough detail to ensure that:

- Hecla has complied with the terms, conditions, requirements and schedules of compliance of the expired permit. Over the past 5 years, Hecla has had only one late permit report for an engineering report and plans & specifications for the evaporation pond system submitted on April 12, 2013 (due date was April 1, 2013).
- Ecology has up-to date information on the facility's waste treatment practices, the facility's site activities (the facility has been inactive since 1995); and the nature, content, volume, and frequency of its discharge.
- The discharge meets applicable effluent standards and limits, ground water quality standards (local limits), and other legally applicable requirements.

Since the issuance of the current permit, Ecology has not received any additional information, which indicates that environmental impacts from the discharge warrant a complete renewal of the permit. Therefore, Ecology chose to reauthorize this permit.

Extreme precipitation that occurred from the fall of 2016 through the spring of 2017 in Eastern Washington prompted the Permittee to evaluate options for discharging treated pond water to a land treatment system. The Permittee prepared and submitted a State Environmental Policy Act (SEPA) checklist, hydrogeologic report, and modified SWD permit application for Ecology review in May 2017. However, Hecla delayed the preparation of the associated engineering report. Ecology will need to review and approve an engineering report in order to permit the land treatment of accumulated pond water.

3. Permit Reauthorization

When Ecology reauthorizes a discharge permit it essentially reissues the permit with the existing limits, terms and conditions. Alternatively, when Ecology renews a permit it re-evaluates the impact of the discharge on the ground water, which may lead to changes in the limits, terms and conditions of the permit.

The permit reauthorization process, along with the renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed their expiration dates. Ecology assesses each permit that is expiring and due for reissuance and compares it with other permits due for reissuance when it plans its workload for the upcoming year.

This fact sheet addendum accompanies the permit, which Ecology proposes to reauthorize for Hecla, a closed gold and silver mining and milling operation (currently undergoing reclamation) to discharge to a groundwater management impoundment and Aspen tailings pond. The previous fact sheet explains the basis for the discharge limits and conditions of the reauthorized permit and remains as part of the administrative record.

4. Permit Limits and Conditions

The reauthorized permit is nearly identical to the previous permit issued on February 22, 2010 with a few exceptions identified below. Ecology removed the completed report requirements that do not require additional or continued assessment. The proposed reauthorized permit includes:

- The discharge limits and conditions in effect at the time of expiration of the previous permit.
- Changes to the submittal dates for reports from those in the previous permit.
- Adjusted dates for the other necessary compliance and submittal requirements carried over from the past permit.
- A new requirement, Appendix A, which identifies the required test methods, detection levels and quantitation levels for the monitoring required in the proposed permit. Ecology added this requirement to ensure that facilities use test methods with detection levels that will detect pollutants at levels necessary to evaluate ground water quality standards.
- A new requirement to report Discharge Monitoring Reports and permit required submittals electronically by using Ecology's online system WQWebPortal.
- A new condition stating that Hecla submit an engineering report for Ecology review and approval for the land treatment of accumulated pond water. The land treatment of water would require a modification to this permit including a public review and comment period.
- A revised schedule for mine water monitoring. Ecology has removed testing for weak acid dissociable (WAD) cyanide due to its consistent non-detectable results.

5. Public Process

Ecology determined that there is no change in volume of the discharge or a change in characteristics of the discharge, nor were there significant changes since the current permit was issued, therefore Ecology is not required to public notice its intent to reissue the permit or solicit public review of the drafts; WAC 173-216-090.

6. Recommendation for Permit Issuance

Ecology proposes to reissue this permit for 5 years.

7. Permit Appeal Process

Appendix A describes the permit appeal process.

8. Permit Appeal Process

Appendix B contains the response to comments.

Appendix A - Your Right to Appeal

You have a right to appeal this permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of the final permit. The appeal process is governed by chapter 43.21B RCW and chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2) (see glossary).

To appeal you must do the following within 30 days of the date of receipt of this permit:

- File your appeal and a copy of this permit with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this permit on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in chapter 43.21B RCW and chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

Appendix B – Response to Comments

Ecology received comments on the draft permit reauthorization documents during a 15 day entity review period. Below are the comments and Ecology's responses. The original comment documents (emails) are on file with Ecology.'

The following are comments were received from the Permittee by two emails dated February 26 and 27, 2018.

#	Comments	Ecology's Responses
1.	<i>Page 4, top of the table, it says that "All permit required submittals" must be electronic. Could this just be limited to the DMR stuff we currently do?</i>	Ecology is moving permitted facilities toward electronic reporting for both discharge monitoring reports and submittals. The final permit includes these electronic reporting requirements.
2.	<i>It seems like we have to submit all lab results electronically (which we have never had to do before) at S3.A.6. Hecla doesn't have to do this at any other site where electronic submittals are required, even at operating sites (both EPA and State reporting at these operating sites).</i>	Permit condition S3.A.6 applies to reporting single-sample grouped parameters, those listed in the first paragraph in S3.A.6: priority pollutants, PAHs, pulp and paper chlorophenolics, TTOs. Electronic reporting would not apply to general chemistry and metals laboratory results.
3.	<i>At S3.B. maybe I am reading "reports" too broadly at S3.B., but S3.F. is all about "Reporting" (thus "reports"?), while also thinking it could include routine site inspections or readings that Smokey currently puts in his site log books and forms. If this was limited to the DMRs I would be more clear on what to submit electronically.</i>	The electronic reporting would also apply to any written noncompliance reports submitted under S3.F.
4.	<i>The Section S4. on "Operations and maintenance" has a lot of electronic submittal requirements. It would be nice if we could keep this as we currently do, keep hard copies at the office and submit any notice of a review or substantial changes by mail. It also seems that S4.A.a.1. thru 5 also require electronic submittal, including simple "reviews, changes, and updates". At this same section under S4.A.b., new additions over the current permit seem to fit active operations, but not inactive ones. Could this subsection "b." remain as per the current permit?</i>	Since the facility is inactive, the O&M requirements have been modified to those required by the previous permit.

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5.	<i>At the last two paragraphs of S2.E. there are two "must" provisions that I do not understand. I suppose they are both "boilerplate" for operating sites but we don't do soil analysis, but if we go the next step on land application that would be appropriate then so maybe leave this out now or move it to S5.A for the potential land application submittal? The second "must" is to participate in a "proficiency testing program", but this web site is for analytical labs and does not seem applicable to this permit renewal so delete this?</i>	Ecology has removed the last two paragraphs under Permit Condition S2.E from the final permit, as they refer to analytical procedures for soil sampling and testing.
6.	<i>At several draft permit locations guidance documents are incorporated as "must" conditions but in our current permit guidance documents are "should". Two of the "must" conditions are in #5 above, and others are at the second paragraph of S2.E. and S4.A.b. – these also appear to be directed to operating sites and not those that have been idle for as long as Republic has been</i>	In Permit Condition S2.E, Ecology has replaced the word "must" with "should" in outlining groundwater sampling protocols.
	<i>On the Addendum to the Fact Sheet:</i>	
7.	<i>Page 1 under item 2, first bullet – over the past 5 years I do not think we had any permit violations. Our flow limit was removed and my hard copies of the submitted DMRs show dates before the deadline.</i>	<p>Ecology has re-examined the Permittee's past compliance history and found discrepancies in our permit system database. These have been resolved and the permit final fact sheet addendum includes a revised discussion of past compliance history.</p> <p>The 5 year compliance history (2013 through 2018) includes only one late report (engineering report and plans and specifications for the evaporation pond system), submitted 10 days past its due date.</p>
8.	<i>Page 1 under item 2, second bullet - could you delete "...the facility's production levels" and replace with "...the facility has been inactive since 1995".</i>	<p>Ecology has changed the portion of this sentence to read:</p> <p>"...the facility's site activities (the facility has been inactive since 1995)..."</p>

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9.	<i>Page 2 under item 4, fifth bullet – could the electronic submittals be limited to the DMRs only? Smokey only has a fax machine, which operates erratically, and the site has been inactive for 23 years. I expect that additional requirements can be added by amendment if Hecla starts planning for operations if the gold price climbs & stabilizes adequately, at which point full-time Hecla staff and computer equipment will be available at the site.</i>	See response to comment #1.
	<i>On the draft permit:</i>	
10.	<i>On the cover page, in two places, replace “190 Knob Hill Drive” with “190 Knob Hill Road”.</i>	This has been corrected in the final permit.
11.	(Ecology note: this comment has been re-phrased from the original). <i>On page 4 of 32, could electronic reporting be limited to the DMRs as in the past? Also on this page, item S6 in the table is item S5 in the draft permit & the renewal submittal deadline in both the rules and current permit is 60 days prior to expiration date of the permit. Also on this page, permit sections G4 & G5 have 180 day requirements but the rules say 60 days. While the site remains inactive, if there ever was a situation where this would be triggered it would be an emergency situation and 180 days cannot help in such situations.</i>	For electronic reporting, see response to comment #1. Ecology has retained the requirement to submit documents electronically. The final permit specifies that the Permittee must submit permit renewal application and any new applications for planned expansions at least 60 days prior to discharge, consistent with the State's Water Pollution Control Law, Chapter 90.48.170 RCW.
12.	<i>On page 5 of 32, second paragraph under S1.A. – “the” needs capitalization.</i>	This has been corrected in the final permit.
13.	<i>Beginning on page 5 of 32, at all tables for “Conductivity” the units should be “Umhos/cm”.</i>	This has been corrected in the final permit.
14.	<i>On page 6 of 32, footnote a, please add “...based upon the weekly readings” at the end of the sentence to clarify that Smokey takes weekly readings.</i>	This has been added in the final permit.

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15.	<i>On page 6 of 32, under S2.B., could a second sentence be added to clarify "Mine water pumping is conducted as necessary, dependent upon site weather patterns, and is not daily and may not occur in every quarter." Pumping is weather-driven due to infiltration of groundwater into the mine.</i>	Ecology added the following sentence under S2.B: "If no discharge of mine water occurred during the reporting period, use code 'C - No Discharge' on the WQWebDMR."
16.	<i>On page 6 of 32, under S2.B., the line below "(2) Mine Water Monitoring", please clarify "The sampling point(s) for mine water can be either at the top of the pump column or a discharge inlet to the Aspen pond or GWMI." It is safer for Smokey this way because he is usually alone when sampling.</i>	This has been added in the final permit.
17.	<i>On page 6 of 32, under S2.B., first "Flow", please specify "Flow (quarterly daily average)" and in the units column explain "gpd (total gallons/90)" – this is how the spreadsheet does the number?</i>	Flow has been noted as a 'quarterly average' in the final permit. The units for this measurement would still remain 'gpd', so that remains the same in the final permit.
18.	<i>On page 6 of 32, under S2.B., also related to "Flow", does it need to be added that the spreadsheet & DMR also has the "Total annual gallons" and "Average annual gpd (total gallons/365)"?</i>	This reporting has been added to the final permit.
19.	<i>On page 8 of 32, under S2.D. the sentence under "(4) Surface Water Monitoring", for clarity change to "Monitor water collected from Mud Lake and Eureka Creek at both the Coreshed and Quilp Mine locations."</i>	This has been added to the final permit.
20.	<i>On page 9 of 32, at the footnotes, please add the safety footnote in the current permit and add a clarifying sentence that "Eureka Creek locations may be seasonally dry, depending upon weather conditions. If "dry", use code XXX on the DMR." This will help me not to screw up the DMR by putting in the wrong code.</i>	Ecology added the following sentences under S2.D: "If a surface water site is dry, use code 'M - Monitoring Is Conditional/Not Req This MP' on the WQWebDMR. If a surface water site is either frozen or has unsafe sampling conditions, use code 'FC Frozen Conditions/Unsafe conditions' on the WQWebDMR."

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21.	<i>On page 9 of 32, second paragraph under S2.E., in the current permit the "must" is "should". We have been sampling groundwater with the same equipment for quite some time now and, if the guidance mandates a certain procedure, we may have to change things which disrupts the historic data set.</i>	See response to comment # 6. Ecology has replaced the word "must" with "should" in outlining groundwater sampling protocols.
22.	<i>On page 9 of 32, last two paragraphs under S2.E., we don't sample soil and the testing program is for labs. Should these be deleted or moved/deferred as requirements at the land application permit section at S5.A.?</i>	See response to comment #5. Ecology has removed the last two paragraphs from the final permit, as they refer to analytical procedures for soil sampling and testing.
23.	<i>On page 11 of 32, at item 2, for clarification could this be added to the end of the last sentence ", or if a surface water monitoring location is dry; if a monitoring well has insufficient volume, use reporting code XXX." (I can't recall that code but I think there is a specific one for monitoring wells but not for dry surface locations).</i>	Ecology added the following sentence under S2.C: "If a groundwater well is dry, use code 'L - Dry Groundwater Well' on the WQWebDMR."
24.	<i>On page 11 of 32, delete items 5. & 6. because the permit does not have averaging conditions & does not sample for "single-sample grouped parameters", which I suppose active operations may have.</i>	To remain consistent with permit shell language, Ecology has not removed these items from the final permit.
25.	<i>On page 12 of 32, last part of S3.C., delete this sentence since we don't monitor sludge or add it to S5.A. Because if we land apply we will have a water treatment plant.</i>	This sentence has been removed from the final permit.
26.	<i>On page 15 of 32, item S3.G.a. seems to be directed at active operations such as Kinross where many substances are stored in bulk and it should be deleted as a permit condition. We don't even store fuel at the site plus compliance with statutes, ordinances, or regulations is already covered at G6 (page 22 of 32).</i>	The site must still undergo final reclamation, some of which may include the use of heavy equipment. Since there is a potential for spills/releases during site reclamation activities, Ecology has retained this condition in the final permit.
27.	<i>On page 15 of 32, under S4., fourth line, maybe change "daily operation logbook" to "appropriate documentation"? This, too, seems geared to active operations.</i>	Ecology has changed the portion of the sentence to read "operation logbook" rather than "daily operation logbook".

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28.	<i>Beginning on page 15 of 32, at S4.A., the changes over what we have in the current permit are geared towards active operations and not inactive sites such as ours, which will remain unchanged until if/when Hecla pursues active operations and if that happens permit modifications will be necessary to address active operations, so couldn't we keep the current permit language on O&M and without electronic submittals? Also at item b. on the next page there is a "must" provision on a guidance and this is clearly directed at active operations with lots of things going on, which is not the case with us.</i>	See response to comment #1. Ecology has retained the permit requirement to submit documents electronically.
29.	<i>On page 16 of 32, item b.3., "monitoring" is misspelled.</i>	This has been corrected in the final permit.
30.	<i>At page 19 of 32, first line under S5., the current permit and rules have 60 days before expiration for the highlighted yellow section.</i>	See response to comment #11. The final permit specifies that the permit renewal application be submittal at least 60 day prior to permit expiration.
31.	<i>At page 22 of 32, first line under G4., the current permit and rules have 60 days, which is more appropriate for this permit.</i>	See response to comment #11 and #30.