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ENVIR. APPEALS BOARD

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September 12, 2003

TERESA A. HILL
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VIA OVERNIGHT DELIVERY

United States Environmental Protection Agency
Clerk of the Board
Environmental Appeals Board
1341 G. Street NW, Suite 600
Washington, DC 20005

**RE: IN THE MATTER OF HECLA MINING COMPANY – LUCKY FRIDAY MINE
NPDES Permit No. ID-000017-5**

Dear Clerk of the Board:

Enclosed are the original Affidavits of Mike Dexter and Bob Tridle in Support of Hecla Mining Company's Petition for Review. Please return conformed copies to me in the enclosed, self-addressed stamped envelope provided.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in cursive script that reads "Kevin Beaton".

Kevin J. Beaton

KJB:ww

Enclosures

cc: Mike Dexter (w/o encls.)
Dave Holland (w/o encls.)
Bob Tridle (w/o encls.)
John Galbavy (w/o encls.)

4. EPA set Method detection limits (MDL) for ambient water quality monitoring in the SFCDA river in section I.D.2 table 7 on page 22 of the NPDES permit. Cadmium, lead and zinc were new additions to this table and were not available for comment in the draft final.

5. The MDL for cadmium and lead are acceptable and easily obtainable at most commercial labs - including SVL, which analyzes the Lucky Friday Unit's samples.

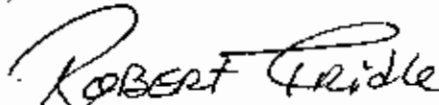
6. The MDL for zinc was set at 5 ug/L and is excessively stringent to monitor instream aquatic criteria.

7. I calculated the instream aquatic criteria using the site specific criteria with an instream hardness of 25 mg/L. The resulting instream aquatic criteria is 78 ug/L. Hardness of 25 mg/L is the lower limit that Idaho uses to calculate hardness based criteria (i.e. if the instream hardness is 20 mg/L then 25 mg/L is used to calculate the criteria). The criteria increases as hardness increases (i.e. at hardness of 74 mg/L the instream aquatic criteria for zinc is 160 ug/L)

8. The most common method for zinc analysis is EPA method 200.7 which has a MDL for zinc of 10 ug/L. This MDL of 10 ug/L should be used in table 7 since it easily measures compliance with the instream aquatic criteria.

9. EPA method 200.8 can be used for zinc analysis (but not by SVL because they lack the equipment and class 100 clean room - along with many other laboratories) with a lower MDL but the expense can be as much as 8 times the cost of the 200.7 method (depending on laboratory setup fees and number of samples analyzed).

DATED this 10 day of September, 2003.



BOB TRIDLE

SUBSCRIBED AND SWORN to before me this 10th day of September, 2003.



Ann C. Robison
NOTARY PUBLIC for the State of Idaho
residing at: Payden
My Commission Expires: 10/31/2004

AFFIDAVIT OF BOB TRIDLE IN SUPPORT OF HECLA MINING COMPANY'S PETITION
FOR REVIEW 3

Boisc-161434.1 0019077-00008

CERTIFICATE OF SERVICE

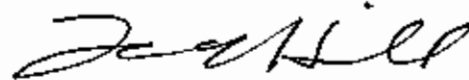
I hereby certify that the Affidavit of Bob Tridle in Support of Hecla Mining Company's Petition for Review was served on this 5th day of September, 2003 as follows:

By overnight delivery to:

United States Environmental Protection Agency
Clerk of the Board, Environmental Appeals Board
1341 G. Street N.W., Suite 600
Washington, DC 20005

By regular mail to:

Director, Office of Water
United States Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, WA 98101



fw Kevin J. Beaton
Attorneys for Hecla Mining Company