



## RECEIVED U.S. E.P.A.

7003 SEP 16 AN 10: 12

ENVIR. APPEALS BOARD

ROLS Capitol Beulevard, Scile 1900 Boxe, Idaho A3702 main 208.389.9000 [ax 208.389.5040] www.sionl.com

September 12, 2003

TERESA A. HILL Direct (208) 387-4264 tahill@stocl.com

## 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,

Kevin J. Beaton

KJB:ww Enclosures

cc: Mike Dexter (w/o encs.)

Dave Holland (w/o encs.) Bob Tridle (w/o encs.) John Galbavy (w/o encs.)

> Oregon Washington Call-orgia Utan Idaho

RECEIVED U.S. E.P.A.

Kevin J. Beaton STOEL RIVES LLP 101 S. Capitol Blvd., Suite 1900

Boise, Idaho 83702

Telephone: (208) 389-9000 Facsimile: (208) 389-9040

Attorneys for Hecla Mining Company

2003 SEP 16 AM (0: 13

ENVIR. APPEALS BOARD

BEFORE THE ENVIRONMENTAL APPEALS BOARD	
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY	Y
WASHINGTON, D.C.	

IN THE MATTER OF	) NPDES Appeal
HECLA MINING COMPANY -	) ) AFFIDAVIT OF BOB TRIDLE IN SUPPORT OF ) HECLA MINING COMPANY'S PETITION FOR
LUCKY FRIDAY MINE	) REVIEW
NPDES Permit No. ID-000017-5	) ) )
STATE OF IDAHO )	
County of Kootenai ) ss:	

- I, BOB TRIDLE, being first duly sworn, depose and say:
- 1. I have personal knowledge of the facts contained in this affidavit.
- I have been employed by Hecla Mining Company ("Hecla") or its predecessors 2. since February 2000.
- At all times relevant to this matter, I have been employed by Heela as the Chief 3. Chemist. My responsibilities include evaluation of water treatment technologies and projected water treatment plant effluent water quality based on those technologies.

AFFIDAVIT OF BOB TRIDLE IN SUPPORT OF HECLA MINING COMPANY'S PETITION FOR REVIEW 1

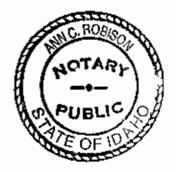
- 4. EPA set Method detection limits (MDL) for ambient water quality monitoring in the SFCDA river in section LD.2 table 7 on page 22 of the NPDES permit. Cadmium, lead and zinc were new additions to this table and were not available for comment in the draft final.
- 5. The MDL for cadmium and lead are acceptable and easily obtainable at most commercial labs including SVL, which analyzes the Lucky Friday Unit's samples.
- 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 <u>10</u> day of September, 2003.

BOB TRIDLE

oBERT GRidle

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



NOTARY PUBLIC for the State of Idaho residing at: The John My Commission Expires: 10/31/2006

## 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 15th 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

Kevin J. Beaton

Attorneys for Hecla Mining Company

Jersill