



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF THE
ADMINISTRATOR

IN THE MATTER OF)
)
NATIONAL POLLUTANT DISCHARGE)
ELIMINATION SYSTEM PERMITS FOR)
)
ALASKA PLACER MINERS)
)
DOCKET NO. X-WP-76-30C)

INITIAL DECISION ON REMAND

82 MAR 27 9 33

INTRODUCTION

In 1976, EPA issued approximately 170 NPDES Permits to the placer mining industry of Alaska. The permittee miners protested that the permit conditions were too stringent and that: (1) EPA lacked the power to regulate their business, and (2) no limits for discharge would be appropriate. Several other groups entered the fray contending that the Permits were not stringent enough and that zero discharge obtained by total recycling was the treatment of choice.

These issues were joined in a Hearing in 1977. Following this Hearing and pursuant to the unusual Rules then in effect, the record was certified to the Administrator of EPA Region X in Seattle for decision.

The Regional Administrator decided that settling ponds should be the treatment of choice since there was not enough testimony in the record on the costs and efficacy of total recycling. This decision was appealed to the Administrator, who, in 1980, decided that the matter should be remanded to the Regional Administrator for the purpose of re-opening the hearing to receive testimony "...on the extra costs of recycling in relationship to the effluent benefits to be achieved from recycling." The Decision also directed that, pending final resolution of the case, settling ponds shall be considered a required treatment scheme.

The Trustees for Alaska, a public interest environmental group, petitioned the Administrator for a partial reconsideration and clarification of his March 10, 1980 Decision. The Trustees argued that a determination that settling ponds alone constitute BPT will leave unanswered several issues properly raised in connection with the Trustees' appeal of the Regional Administrator's Initial Decision. The Trustees pointed out that irrespective of the BPT issue, the 2 ml/l limitation for settleable solids will not prevent violation of state water quality standards for turbidity (total suspended solids), arsenic and mercury, and that effluent limitations for these parameters should be established along with additional monitoring requirements directed to these other pollutants.

The Administrator, recognizing the logic of this argument, modified his Decision on July 10, 1980, by directing the Presiding Officer to allow additional evidence to be received if he believes that such evidence is necessary to make the requested determinations.

Following a pre-hearing conference, the Hearing commenced on March 17, 1981, was continued until June 2nd and ended on June 5, 1981. Following the Hearing and after distribution of the transcript, the matter was briefed by the parties. Proposed findings of fact and law were also submitted.

THE ISSUES

1. Burden of Proof

One of the primary reasons underlying the Regional Administrator's Initial Decision was that the Trustees and Mr. Zemanski, the original requestor, failed to sustain their burden of proof that recycling constituted BPT. The Administrator in his Decision held that the Regional Administrator, the presiding Judge and all the parties had somehow misapplied the burden of proof. The Administrator blamed this error on a "lack of clear guidance in the procedural Rules and in past decisions". On the contrary, the then-applicable Rules of procedure were very clear in placing both the burden of proof and of going forward with the evidence on Mr. Zemanski, the requestor. The General Counsel of EPA on at least three previous occasions had addressed this question in his written decisions. On all occasions, the Agency's chief legal officer upheld the Regulations concerning placing the burden of proof on the requestor. See decisions of the General Counsel numbers 4, 23 and 51.

Despite this history, the Administrator, in his Remand Decision, shifted the burden of proof to the Miners. Ostensibly his ultra vires act was authorized by the notion that the Agency's duly promul-

gated Regulations were in direct conflict with the language of the Clean Water Act and therefore could be ignored by executive fiat. No mention is made of just how the Rules are in conflict with the Statute. In his brief on behalf of the Miners, Mr. Farleigh complains about this state of affairs. Although I sympathize with Mr. Farleigh and agree that the Administrator probably overstepped his authority in summarily revoking a properly promulgated Regulation, we are bound by his ruling at this point in the procedure. An argument could be made that the new Rules should apply to this remand and to some extent they allocate the burdens of proof in a fashion more closely akin to that mandated by the Administrator in his Decision.

2. Ponds

A great deal of testimony and an even greater amount of cross-examination involved the question of ponds. How to build one, what they cost and how well they work. All of this is relevant because ponds form the basis for all the parties' notion of what constitutes BPT.

The Trustees and Mr. Zemanski take the position that the cost of constructing a pond for closed cycle operation of a placer mine is irrelevant and not a proper cost item to address since properly constructed settling ponds are required no matter which control technology is finally adopted.

The Miners Association and Mr. Rosander, a miner appearing pro se, take issue with this position arguing that settling ponds which can achieve the 2 ml/l effluent limit, and in some cases the 25 J.T.U.

limit as well, are not completely impervious as would be required for the zero discharge associated with closed cycle operation. They argue that the majority of ponds used by the miners in Alaska are not impervious, but rather act as filter devices which, when used in series and obtain a state of partial siltation, are very effective control devices. They leak, and are supposed to. The Miners also argue that the materials needed to construct an impervious pond are not available at most mine sites.

These opposing contentions will be discussed later.

3. B.P.T.

§301(b) (1) (A) of the Clean Water Act requires that the subject Permits contain limitations requiring the application of "best practicable control technology currently achievable" which we refer to as "BPT". Since no industry-wide, nationally applicable effluent limitations have been promulgated for the placer mining industry, the EPA is authorized by §402(a) (1) of the Act to issue permits on a case-by-case basis upon "such conditions as the Administrator determines are necessary to carry out the provisions of this Act." In making this determination, the Agency must consider the factors of §304(b) of the Act which include:

"...the total cost of application of technology in relation to the effluent reduction benefits to be achieved from such application, ...the age of equipment and facilities involved, the process employed, the engineering aspects of the application of various types of control techniques, process changes, non-water quality environmental impact (including energy requirements), and other factors as the Administrator deems appropriate."

In the context of the present inquiry, legislative intent as adopted by the courts teach that the cost aspect of the equation means that EPA must examine the incremental cost of an additional technology and assure itself that such cost is not totally out of proportion to the benefits incurred by the utilization of that technology expressed in reductions in the discharge of pollutants to the waters of the United States.

In other words, if settling ponds alone would remove 98 per cent of all relevant pollutants and recycle would eliminate 99.5 per cent, but at a cost ten times that of settling ponds alone, an argument could be made that total recycle does not pass the statutory test. Unfortunately, the data and testimony in this case is not so clear cut.

In their request for reconsideration by the Administrator, the Trustees apparently overlooked a key provision of the existing Permits. The Trustees expressed concern that if settling ponds were to be found to constitute BPT, some provision must be made to account for total suspended solids (TSS), mercury and arsenic. The Permits, as written, do account for TSS. The settling pond provision only relates to the 2 ml/l settle solids limitation. The 25 J.T.U. limitation included in the Permits, pursuant to §401, at the request of the State of Alaska, must still be met and that limit is designed to meet the TSS requirement. J.T.U., or Jackson Turbidity Units, measure the light scattering effect of solids suspended in a liquid medium and thus are an indirect measurement of TSS. This parameter

can be measured by a hand-held device powered by a 12-volt auto battery, such as the Hach Model 2100. Therefore, if settling ponds are determined to constitute BPT, the Miners must still meet the 25 J.T.U. requirement. Testimony by witnesses appearing for all sides of this controversy agreed that the 25 J.T.U. limit represents almost clear water and thus is very difficult to meet. However, like the 2 ml/l limit, the TSS limit is a net limit and is measured 500 feet downstream from the outfall. Since many of Alaska's streams carry a high loading of glacial flour, a net limit for TSS is indicated. As indicated by the report prepared by the EPA National Enforcement Investigations Center entitled "Evaluation of Settleable Solids Removal Alaska Gold Placer Mines" which appears as attachment II to EPA Exhibit No. 56, at least two mines utilizing ponds in series could meet the J.T.U. limit.

According to this report as well as the "Calspan Report" prepared by Calspan Advanced Technology Center, which evaluated wastewater treatment practices at Alaska Gold Placer Mines, both the 2 ml/l and the TSS limit can be achieved by the use of settling ponds in series. These reports also indicate that in some cases these treatment techniques also reduce mercury and arsenic levels to below background.

This is likely for two reasons: (1) in some areas of Alaska, there is a high level of naturally occurring arsenic in the streams, and (2) most arsenic is closely associated with particulate matter and as settleable and suspended solids are removed from the waste stream a high reduction in the associated arsenic is experienced.^{1/}

^{1/} Environmental Path of Arsenic in Groundwater, Institute of Water Resources, Univ. of Alaska, October 1976. D. B. Hawkins.

I think that by now most observers, including EPA, realize that this provision was a mistake. In its initial appeal brief to the Administrator, Region X sought to have that provision deleted from the Permits. I can understand why EPA included the provision in the Permits. It saved the miner the time and cost required to sample and analyze their effluent, and it provided an easy enforcement tool for EPA in that if a miner did not have a pond it could be inferred that he was in violation of the permit and conversely if he had an operating pond in use, it could be assumed he was meeting the 2 ml/l limit. The problem with that approach is that it tended to focus everyone's attention on technology and away from protecting water quality.

One must remember that the only reason for identifying BPT is to arrive at effluent limitations. The technology ultimately identified as BPT merely provides a measurable efficiency from which allowable concentrations of target pollutants can be set. These limits can be expressed in terms of mass, concentration or weight per unit of produced product. The exact phraseology of the effluent limitations as expressed in the permit are not really important, the only important thing is that the permittee meet them. How he elects to do so is none of EPA's business, nor can EPA dictate or prescribe how a permittee must meet them. No specific technology may be included in a permit. The reason for this small dissertation is that throughout this whole procedure one side was saying, "We cannot install closed cycle technology," and the other side was saying, "The law says you must". Of course, the law says no such

thing. What Mr. Zemanski and the Trustees were really saying was that the Permits must require a zero discharge and that limit can be achieved by utilizing total recycle of sluice water, which is a technology readily applicable to gold placer mining. If one were to decide that zero discharge is a proper limitation to put in the Permits, the miners could achieve it by any means they wanted to use, but for the life of me I can not envision any other way than recycle.

4. Costs

All parties agree that at least two elements should be included in determining the added or incremental costs associated with total recycle, i.e., a pump with all operating and maintenance costs associated therewith, and pipe to transport the sluice water from the recycle pond back up to the sluice box. Of course, no one agrees what these items cost. EPA estimated pump costs to range from \$25,000 to \$75,000 depending on the type, size, water head and volume to be pumped. Mr. Zemanski puts the average cost at about \$16,000 F.O.B. Anchorage. The cost assigned by the Miners ranged from \$20,000 to \$240,000, with most miners estimating a cost in the range of \$44,000 to \$56,000. Based upon all of the testimony, I am of the opinion that a cost of \$50,000 would be reasonable for a pump, motor and skid.

As for the pipe, EPA and the Miners based their costs on steel pipe, while Mr. Zemanski assumed plastic pipe. I can find no reasonable argument in the record which would preclude the use of plastic pipe for this application. Mr. Zemanski estimates a cost of this pipe and its necessary fittings to be \$5,370 F.O.B. Anchorage. I find no problem with that figure.

On the basis of fuel at \$1.50/gallon at the site and sluicing 10 hours/day, six days a week for 16 weeks, the fuel cost would be \$12,960 per season. An estimate of spare parts and fuel storage is \$2,500. Maintenance costs at \$30/hour, 8 hours a week is \$240 a week or \$3,840 per season.

Most of the mines in Alaska are located in remote areas where transportation is a real problem. Some miners fly in their supplies, some use boats in conjunction with trucks and bulldozers pulling sleds. In many cases, access to the sites for heavy hauling is limited to those times when the ground is frozen; so all supplies must be brought in at the same time. Depending on location, these costs vary from \$2,000 (Hederly-Smith) to \$60,000 (William Hall). EPA witness Lamoreaux estimates \$5,000. Mr. Zemanski assigns about the same. \$5,000 seems to be a reasonable average cost.

EPA estimates a cost of about \$4,500 for site preparation for the pump, pipe and assembly. This figure is acceptable. Moving the pipe, pump and associated equipment to safe ground at the end of the mining season and winterizing it should cost about \$3,600.

Other costs would include interest on the loan, moving the equipment once more during the mining season, and other minor costs.

The costs, then, breakdown as follows:

Pump	\$50,000
Pipe (P.V.C.)	5,370
Fuel	12,960
Spare parts & fuel storage	2,500
Maintenance	3,840
Transportation	5,000
Site preparation	4,500
One move	4,500
Storage & winterizing	3,600
Interest & incidentals	<u>9,000</u>
TOTAL	\$92,270
Tax savings on salaries, fuel & depreciation	\$18,000
NET COST	<u>\$74,270</u>

Of course, this is a first year cost and costs for following years will be less, but not a whole lot since, with exception of transportation, most of the costs are continuing in nature.

The Miners allege that since the sluice water will become thick with solids as recycling progresses, they will experience a loss in gold recovery. Zemanski and other witnesses dispute this claim. The Trustees' witnesses on this subject could cite no actual studies showing no gold losses, since most of the proffered theory involved spherical objects and gold fines tend to be flat. On the other hand, except for one allegation by a miner that he noticed a loss in recovery while practicing recycle for a short period, no real data was presented to prove that a loss occurs. At this point in time, no competent evidence exists to prove this cost item and therefore no figure will be assigned to it.

As we discussed above, there is a dispute over whether it is proper to assign some additional cost to building an impervious dam to be used with total recycle as opposed to the leaky ones now used as settling ponds. It occurs to me that to call what the miners now use "settling ponds" is a slight misnomer since their function involves both settling and filtration. The evidence seems to support the notion that these filtering ponds do a better job of cleaning the wastewater than a true settling pond alone would be expected to achieve. The basis for this statement is the fact that some ponds, as currently utilized, will meet the 25 J.T.U. number. Settling ponds utilized solely as such will do very little to eliminate suspended solids, by the very definition of the term, and also as reflected in the data.

I must therefore conclude that some additional cost must be allocated to total recycle to reflect the time, labor and equipment costs associated with this extra effort. Just what this figure should be will be discussed later.

5. Benefits

Both Mr. Zemanski and Mr. Lamoreaux for the EPA performed calculations which purported to illustrate the effectiveness of observed settling ponds in removing pollutants compared to the results one would expect with a total recycle system.

The calculations for settling ponds resulted in the following numbers:

	<u>Zemanski</u>	<u>Lamoreaux</u>
Settleable solids	93%	99.7%
Suspended solids	87%	98.9%
Turbidity solids	64%	Insufficient Data
Arsenic	75%	95.2%
Mercury	76%	76-100%

The difference between these percentages and 100% represent the theoretical incremental benefits one would expect to see if total recycle were installed. One major flaw with that statement is that the testimony of all witnesses who addressed this issue, including Mr. Zemanski, was that total recycle will not result in zero discharge. Some unknown amount of seepage or water loss will occur.

DISCUSSION AND CONCLUSION

Although previous decisions in this case have discussed the nature of gold placer miners in general, I feel that some further discussion is indicated.

For the most part gold placer mining in Alaska is a small family operation, with the exception, of course, of the two large dredging operations. The typical mine employs two to four persons, usually family members. The miners only operate from June to September or roughly from thaw to freeze. In June, the family packs up and heads for the mine site which is located in the bush far from towns or roads. They must take in all supplies, such as: food,

fuel, tools and equipment. Trucks can bring these supplies to the end of paved roads. From there a typical miner will load his supplies on large sleds or skids and tow it to the mine site with a dozer or other tracked vehicle. They then must set up camp, take the equipment and tools out of protective storage and begin to prepare the ground for mining. With a dozer, high lift or whatever is used, the overburden, if any, must be removed to expose the pay dirt or placer deposits. The sluice is set up, water is brought to the sluice and separation of gold from dirt begins. In most cases, the miner moves upstream as he mines, relocating his sluice and equipment as he goes. Ponds are constructed, usually out of sluice tailings or other available materials and in many cases new ponds are built upstream from the old ones, resulting in a series of rather small ponds through which the wastewater percolates, is filtered and solids are settled out. The record indicates that most ponds are very shallow and not as efficient as settling basins as deeper ponds would be.

It is true that total recycle is mandated for related mining operations, such as the sand and gravel industry, but the record does not disclose any placer mine operating in Alaska with total recycle and zero discharge, such as Zemanski and the Trustees advocate. Some miners operate with partial recycle to conserve water, but they must use make-up water to supplement the water lost through seepage through the ground.

Placer mining, by definition, is done in old or existing stream beds some of which have been mined before. The result of this is that in many cases a supply of neatly segregated clay or fine materials from which to construct a dam with an impervious core is simply not available.

There is no doubt that it is theoretically possible to operate a placer mine with total recycle. Mr. Zemanski's orderly engineer's mind cannot understand why anyone would suggest that it might not be practicable to construct and operate a total recycle system at any mine site in Alaska. I do not think that it is practical out in the bush country. Certainly a sand and gravel operation located on the outskirts of Columbus, Ohio or Gary, Indiana can construct a closed system. These operations usually stay in the same location for years. All kinds of equipment, building materials and emergency facilities are only a phone call away should a mishap occur at one of these sites. Not so in the back country of Alaska. If a pump goes out, a line breaks, a pond is breached in the bush, total shutdown is mandated and in all likelihood wastewater containing high concentrations of pollutants would be released to the receiving stream.

All of the miners who testified, as well as Mr. Lamoreaux for EPA, stated that it is almost impossible to construct a non-leaking pond in Alaska. Even if an impervious core could be obtained for the lower wall of the pond, ground water intrusion and extrusion will take place because many ponds are built at or below the water table.

Even if a miner could economically construct a water-tight pond on bed rock with no water intrusion or extrusion occurring, this structure must be periodically relocated upstream as mining progresses. In order to be feasible, the recycling pond must be located rather close to the sluice box or else pipe costs and pumping requirements become totally uneconomical. The likelihood of finding the exact combination of materials, location and area for such a perfect pond at a series of locations moving upstream, would, in my opinion, be remote.

When viewed in its totality, the Alaska gold placer mining industry must be considered unique and hence technology used by kindred endeavors is not necessarily transferable to it. Here we have an industry that only operates for a short period of time during the year in remote wilderness areas, must be totally shut down, moved and started up again each season. All of this to be accomplished in a hostile environment. It occurs to me that even if industry-wide effluent limitations for gold placer mining had been promulgated, a good argument could be made for the notion that the Alaska segment of that industry is entitled to a waiver from those requirements based on the theory that they are "fundamentally different" from the rest of the industry.

I find that the preponderance of the evidence in this case indicates that zero discharge is not "practicable" for gold placer miners in Alaska. I also find that since zero discharge is not feasible, the incremental benefits associated with recycle technology become diminished to an unknown degree when compared with the

rather high levels of pollutant removal associated with settling and filtration ponds. In other words, the difference between what settling ponds can do as compared with recycle becomes something less than that figure one gets by subtracting a given efficiency from 100 per cent. Since that number is unknown and possibly unknowable, given our current state of data generation, it is not possible to complete the analysis that the statute requires be done in determining BPT for an entire industry.

As we all know by now, having benefited from numerous court decisions on the subject, determining BPT and the effluent limitations associated therewith does not finish the permit writing job. State water quality standards must still be met even if that effort requires meeting effluent limitations more stringent than those mandated by BPT. The 25 J.T.U. requirement in the subject permits was included on the basis of state certification pursuant to §401 of the Act. My review of the record indicates that the State of Alaska has water quality standards of arsenic and mercury. Although the State did not address these pollutants in their certification, EPA has an independent duty to assure that any permit it issues will contain effluent limitations which will prevent violation of state water quality standards.

Most of the data on these pollutants found in the several reports in the record of this case reflect concentrations from mines that are meeting neither the SS or TSS limitations of the permits. Since we know that arsenic and mercury concentrations in the waste

stream are reduced as solid content is lowered, we do not have a lot of information on what levels we might find if SS and TSS were being met. It may turn out to be the case that no substantial problem exists with these two pollutants. However since we are dealing with toxic substances, it is not sufficient merely to speculate on what may or may not turn out to be the fact.

Accordingly, I would direct that the subject Permits be modified to require that monitoring for arsenic and mercury be accomplished on whatever frequency EPA and the State of Alaska deem to be appropriate. This monitoring should be carried out for at least one mining season to determine whether or not arsenic and mercury constitute a problem with placer mining. It is, of course, expected that the miners will also be meeting the SS and TSS limits of the Permits. How the miners elect to meet these limits is up to them. It may require some recycle in conjunction with settling ponds used in series or perhaps some other technology currently not employed in Alaska.

If, after this monitoring exercise is completed, it is shown that arsenic and mercury pollution is sufficiently widespread, the Permits can be modified to include effluent limitations for these elements of sufficient stringency to protect state water quality standards. If, on the other hand, it is shown that there is no problem or that it exists only on certain streams or in certain areas of Alaska, individual limits can be placed in the appropriate Permits.

I, therefore, conclude and direct that the subject Permits be amended by:

1. Deleting any reference to technology.
2. Including therein monitoring requirements for mercury and arsenic as discussed above.
3. Including therein monitoring requirements for settleable solids and turbidity.

This decision would not be complete without some comment on the participants. I would like to compliment two individuals for their perseverance, integrity and dedication to their respective viewpoints. One is Mr. Gil Zemanski, an engineering student at the University of Washington, who initiated this action by challenging the Permits in 1976. Although Mr. Zemanski's fervor is not appreciated by all parties to this controversy, we all need persons of his caliber to question, probe and test the actions of government agencies. The other individual is Mr. Ronald Rosander, the operator of a modest family-run placer mine, who appeared pro se in these proceedings. He was present every day of the hearings, prepared and introduced testimony, cross-examined witnesses, wrote briefs and participated fully in this entire case. Mr. Rosander's ability to grasp many legal concepts and his obvious honesty and candor bring credit to him and his profession.

I think the placer miners of Alaska have come a long way since this case first started in 1976. The miners being strongly individualistic by nature vehemently resisted any attempt by EPA to regulate their industry. But now I sense in them a new awareness of their responsibility, not only to the environment, but to their fellow Alaskans to operate their mines in a proper manner. I hope my perception is correct.



Thomas B. Yost
Administrative Law Judge

DATED: March 17, 1982

**Judge Thomas B. Yost
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30308
Phone Number — 404/881-2681**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF THE
ADMINISTRATOR

IN THE MATTER OF)	
)	
NATIONAL POLLUTANT DISCHARGE)	ADDENDUM
ELIMINATION SYSTEM PERMITS FOR)	
)	INITIAL DECISION ON REMAND
ALASKA PLACER MINERS)	
)	
DOCKET NO. X-WP-76-30C)	

I just noticed that throughout the decision, the limitation for settleable solids is expressed as 2 ml/l. It should, of course, be 0.2 ml/l.



 Thomas B. Yost
 Administrative Law Judge

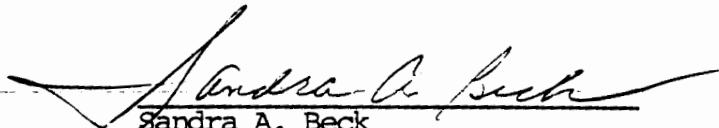
DATED: March 30, 1982

10:10 3/31/82

CERTIFICATION OF SERVICE

I hereby certify that the original of the Addendum to the Initial Decision on Remand was served on the Regional Hearing Clerk, EPA Region X, and that true and correct copies were served on the following by regular U.S. mail:

ANNE M GORSUCH, ADMINISTRATOR ENVL PROTECTION AG A100 401 M ST SW WASHINGTON DC 20460	BESSIE HAMEL HEARING CLERK ENVL PROTECTION AG A110 401 M ST SW WASHINGTON DC 20460	G M ZEMANSKY C/O FRIENDS OF THE EARTH 4512 UNIV WAY NE SEATTLE WA 98105
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Sandra A. Beck
Secretary to Judge Yost

BEFORE THE REGIONAL ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Seattle, Washington

In the Matter of)	DOCKET NO. X-WP-76-30C
National Pollutant Elimination)	ON REMAND APPEAL NO. 79-1
System Permits)	
170 ALASKA PLACER MINERS)	CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 24th day of March, 1982, she mailed a true and correct copy of page 8 of the Initial Decision on Remand by United States mail, postage prepaid, to the following:

Anne M. Gorsuch, Administrator Environmental Protection Agency 401 M Street, Southwest, A-100 Washington, D.C. 20460	Bessie Hamiel, Hearing Clerk Environmental Protection Agency 401 M Street, Southwest, A-110 Washington, D.C. 20460
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A true and correct copy of page 8 of the Initial Decision on Remand was hand delivered on the 24th day of March, 1982 to:

John R. Spencer, Regional Administrator
Environmental Protection Agency, Region X

John Y. Hohn, Attorney, Office of Regional Counsel
Environmental Protection Agency, Region X

DATED this 24th day of March, 1982.


VALERIE D. BADON
Regional Hearing Clerk, Region 10

Certificate of Service - 1

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