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Page 9/75 – Metals are the only suspected contaminants on your property and sediment, surface water, and groundwater are not contaminated seem contradictory. Do you mean only elevated levels in waste rock/tailings present on site? There is likelihood that sediment is also around the site that has elevated metals.

Page 9/75 – Is this model remedy program to be used as a stand alone option for cleanup or is planned to be paired with the VCP program as the mechanism for remediation? It seems that if folks are seeking a NFA, they need to proceed under the VCP, but can still use model remedies, which would waive the fee?

- Should a VCP be considered for a larger project (>2000 CY)? What would the mechanism be if those larger projects are encountered?
- Would Ecology work with a 3 rd party or landowner to accomplish cleanup of mine waste in excess of 2000CY? What would that process look like?

Page 15/75 – Has WA considered in-situ treatment of mine wastes, which is also referred to as in-situ phytostabilization? This would be using a limestone (pulverized or crushed) product to neutralize the acidity present, which also helps with reducing the availability and dissolution of metals in the soils. In situ is also often combined with other organic amendments such as fertilizers, compost, humates, mycorrhizae, native seed and mulch to raise organic rates and moisture retention to create a conducive growing medium. Sometimes this is a good option if metals concentrations are elevated enough to warrant action, but not enough so for consolidation. It looks like this could be considered under an “Additional Option” under page 24/75?

Page 16/75 – Ecology will conduct initial determination sampling at y our property at no cost. This is a really nice feature, but does this then put the owner on the hook to cleanup contamination if it is present? If so, this should likely be explicitly spelled out.

Page 17/75 – Concur with the 30 point composite sampling approach. We usually do that down here as well.

Page 53-4/75 - Compliance with State and Federal Laws. If contaminated mine waste is present on site and considered hazardous to ecological receptors or human health, how should an applicant deal with EPA? Does Ecology consult with EPA regional staff or is this MTCA process protective enough of the applicant?

- This program seems geared towards private landowners. Can a third party organization, like Trout Unlimited, work with a private landowner to complete these types of cleanups? This is often

then case given the technical expertise that TU staff can bring, as well as the ability to generate grant funds or other sources of revenue to fund these sometimes expensive cleanups. Please advise?