

From: [Vaughn Frei](#)
To: [Vidic, Natasha@Waterboards](mailto:Vidic.Natasha@Waterboards)
Cc: [Shelton, Brad@Waterboards](mailto:Shelton.Brad@Waterboards); [Clark Burton](#)
Subject: RE: 2023 April Board Meeting agenda/McLaughlin WDR/MRP
Date: Monday, April 17, 2023 11:33:34 AM
Attachments: [image.png](#)
[image.png](#)
[image.png](#)

EXTERNAL:

Good morning Natasha,

Thanks for the update! We plan on requesting a Zoom link to attend virtually.

Below are four issues regarding the revisions to the Tentative Waste Discharge Requirements. Specifically, we believe that four of the Water Board's responses to comments still require minor revisions in the WDR, which are as follows:

(1) In response to Comment 1.b. regarding Finding 46, the Water Board stated that it would change all references to the Updated Closure Plan for the TIF as a technical report to an Updated TIF Closure Plan. However, Finding 46 states, "This Order requires submittal of technical report with an evaluation demonstrating the proposed infiltration gallery will not impair surface or groundwater quality (See Sections E.1 and I.2)." Instead, the proper revision should read as "This Order requires submittal of an Updated TIF Closure Plan with an evaluation demonstrating the proposed infiltration gallery will not impair surface or groundwater quality (See Sections E.1 and I.2)."

(2) In response to Comment 1.b. regarding Finding 61, the Water Board stated that it would change all references to the Updated Closure Plan for the TIF as a technical report to an Updated TIF Closure Plan. However, Finding 61 states, "This Order requires that the Discharger submits an updated TIF closure technical report addressing the coverage of the remaining TIF surface areas and the feasibility of directing Pump-back liquids to an infiltration gallery (Sections E.2 and I.2)." Instead, that proper revision should remove the reference to "technical report" and replaced with "plan."

(3) In response to Comment 3 regarding Finding?, the Water Board stated that it would remove the following four duplicative Yolo County APNs since they were already in Table 2: 018-280-003, 018-310-001, 018-310-021, and 018-310-023. However, the Water Board's revision completely removed the four APNs from the document. It appears that a proper revision would have only removed the APNs from Finding 2.

(4) In response to Comment 20 regarding Finding 91, the Water Board stated that "Reference to section I.5 has been changed to I.4." However, the Water Board's revision now only references "I" and fails to reference "1.4," thus, a proper revision must include subsection 4 after I.

Thanks and have a great week.

Cheers

Vaughn Frei

Mine Closure Manager