

MEMORANDUM TO FILE

TO: KMCC Correspondence File

FROM: Brian A. Rakvica

DATE: August 1, 2003

CC: Todd Croft and Jeff Johnson

RE: Review of Chromium Mitigation Permitting

1. Brian reviewed the KMCC Consent Agreement for chromium mitigation (1986) and noted that the discharge limits exceeded the MCLs. The subsequent UIC permit (1995) reiterated these limitations.
2. Brian reviewed this issue with Russ Land (BWPC – CC) and Russ noted that the year 2000 renewal for this permit had not yet been issued. Brian explained the issue of the discharge limitations and Russ noted that Evan Chambers will address this issue.
3. Brian began to review the various NPDES and GW permits for the KMCC. The chromium mitigation system discharges to an on site pond (GW-11 as noted by BWPC) and is regulated by permit # NV0023060. Discharge limitations are: 0.01 ppm for hexavalent chromium and 0.1 ppm for total chromium (which matches the MCL for total chromium).
4. The DMRs for this permit indicate that concentrations of chromium have been ND typically.
5. ACTION ITEM: BWPC needs to re-issue the UIC permit # NEV94218 to change the discharge limitations to the applicable MCLs. Brian to follow up with BWPC.