

“LOW-LEVEL MERCURY SAMPLING WILL BE PERFORMED IN ACCORDANCE WITH EPA METHOD 1669.”

That’s two different methods.

Table 2 in “WATER QUALITY AT TWIN PINES MINE” by Robert M. Holt, October 31, 2019, 2-MLUP-App-H-b-Water-Quality-10-31-2019-Figs-Tables-and-Apps.pdf, says the actual method of “Laboratory Analysis” for mercury was “SW-846 7470A”.

So that’s three different methods.

- **Why is the laboratory method specified for ongoing mercury analysis different from the method used in preliminary sampling?**
- **Since those methods are different, how can we depend on the low results for mercury from the preliminary sampling?**

Sheet 11 of the MLUP, Section 3.3.1 “PROCEDURES”, paragraph F, “LABORATORY ANALYSIS” says,

“WATER QUALITY SAMPLES WILL BE ANALYZED FOR THE CONSTITUENTS SPECIFIED IN TABLES 3.3-2 AND 3.2-4.”

Paragraph J says there will be trend analysis, and Section 3.3.2 “DATA ANALYSIS AND REPORTING” says,

“WATER CHEMISTRY DATA WILL BE REGULARLY COMPARED TO BACKGROUND CONCENTRATION AND APPLICABLE REGULATORY STANDARDS.”

Section 3.3.2 further mentions there may be a statistical summary, before the section is cut off in the middle of a sentence.

- **What happens if the test data show measurements exceed applicable regulatory standards?**

For groundwater levels, Sheet 11 Section 2.5 “ADAPTIVE MANAGEMENT AND CONTINGENCY PLAN” says no further action will be required if certain specific conditions are not achieved but the problem can be attributed to factors unrelated to the mining. Which seems to apply otherwise action will be required. What action is not said ther than maybe increase the amount of bentonite. However,

“A CONTINGENCY PLAN WILL BE PREPARED AND SUBMITTED TO EPD FOR ITS REVIEW AND APPROVAL PRIOR TO IMPLEMENTATION.”

- **Why did EPD not require a water level contingency plan to be included in the MLUP?**
- **Will EPD require a water level contingency plan to be included in the MLUP?**
- **But for mercury not even that potential contingency plan level of clarification is mentioned in Sheet 11.**
- **What will the miners have to do if their sampling finds too much mercury?**