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Janet Cohen, Executive Director
SYRCL

Janet,

Recently the US EPA has provided me with copies of two field monitoring reports covering work that was done during the past year at the Lava Cap Mine site. My comments on these reports are presented below.

Review of the Lava Cap Mine Superfund Site Field Monitoring Report for Remedial Investigation/Feasibility Study; Field Activities - August through November 2001, Prepared for the US EPA by CH2M Hill, April 2002

On page 7 is a presentation of the results from the arsenic III and V studies on groundwaters. It would be of interest to compare the III-to-V ratios to the redox potential measurements to see if the groundwaters with high arsenic V tend to have a higher redox potential.

On page 9, the last sentence states, "... were essentially non-detect." Statements of this type should always be accompanied by the detection limit that was used.

Review of the Lava Cap Mine Superfund Site Field Monitoring Report; Quarterly Monitoring Activities; February and May 2002, Prepared for the US EPA by CH2M Hill, September 2002

A review of this report shows that the US EPA has still not established a credible monitoring program for the Lava Cap Mine site with respect to surface water transport of tailings and arsenic from the mine area downstream during stormwater runoff events. This is a significant, serious deficiency with the site investigation that must be corrected this year. Failure to do so will be a significant error on the part of the US EPA. They must establish crews in the area who can take samples of stormwater runoff and measure flow of the creek at various locations during runoff events.

I understand that there will be additional work done on groundwater hydrology. Sometime in the near future an assessment of what is known about groundwater hydrology should be developed for review. This would then serve as a basis for developing a groundwater monitoring program to fill gaps and verify the understanding that exists of flow direction and magnitude.

If there are questions about these matters, please contact me.

Fred