

WPDES permit application for the Kennecott Flambeau Project. 1989

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Foth & Van Dyke

New New Dischargers for white with

WPDES Permit Application for the Kennecott Flambeau Project

Scope I.D.: 87K10

Kennecott Minerals Company Ladysmith, Wisconsin

April 1989

Kennecott Minerals Company 1515 Mineral Square P.O. Box 11248 Salt Lake City, Utah 84147 Telephone (801) 322-8460 FAX (801) 583-3129

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April 1, 1989

Kennecott 87K10-57

Michael Witt, Chief Industrial Wastewater Section Wisconsin Department of Natural Resources P. O. Box 7921 Madison, WI 53707

Dear Mr. Witt:

RE: Kennecott Flambeau Project WPDES Permit Application

Kennecott Minerals Company (Kennecott) is pleased to submit to the Wisconsin Department of Natural Resources (WDNR) the enclosed WPDES discharge permit application. The permit application includes the following documents:

Application Form 1 - General Information, Consolidated Permits Program

Application Form 2D - New Sources and New Dischargers: Application for Permit to discharge process wastewater

Preliminary Engineering Report for Wastewater Treatment Facilities - Kennecott Flambeau Project

This application and report are being submitted pursuant to Wis. Stat. ch. 147.

A comprehensive Environmental Impact Report for the Flambeau Project has also been submitted to the WDNR. The document contains 12 months of background monitoring data for the Flambeau River. This data will provide the WDNR with the information regarding receiving water characteristics needed to establish discharge limits per Wis. Admin. Code Chs. NR 105 and NR 106. Michael Witt, Chief Wisconsin Department of Natural Resources April 1, 1989 Page 2

The primary discharge points will consist of an outfall for the project's wastewater treatment plant and an outfall for the project's settling ponds. Both outfalls will discharge to the Flambeau River. Also included in the proposed project is the flexibility to discharge treated water from the wastewater treatment plant and the settling ponds to a wetland located near the proposed open pit. Hydrologic studies have shown that mining operations may disrupt water flow to the wetland. To avoid adverse impacts to the wetland, the project includes provisions to replace any disrupted water flow when needed, with water from the wastewater treatment plant and/or from the settling ponds.

With respect to NR 207 "Water Quality Antidegradation," Kennecott hereby makes the following statements.

- 1. The Flambeau River is considered a fish and aquatic life water as defined under NR 102.13.
- 2. As provided for in Wis. Admin. Code NR 207.05(3), Kennecott waives the procedure in s. NR 207.05(2)(a) to (d). The mining project will accommodate important economic and social development through an increase in employment and other factors enumerated under NR 207.04(1)(c). Estimations of this impact are available in Section 3.13 of the Environmental Impact Report.
- 3. The proposed discharges cannot be altered through the use of additional conservation or recycling measures beyond those already employed. The discharges will consist of pit groundwater inflows and storm water runoff which comes in contact with the ore, Type II material, Type I material, overburden, and/or saprolite. Every effort has been made to limit the area impacted by this project and thus limit the amount of storm water runoff generated from the site. See Section 4.0 of the EIR for further discussion of this issue.
- 4. The wastewater treatment facilities, designed by Ford, Bacon & Davis provides the technology needed to meet water quality effluent limits. This technology has been evaluated through bench scale tests which are discussed in the attached Preliminary Engineering Report. Alternate technologies were evaluated in the preliminary evaluation of the wastewater treatment processes but were ruled out for various reasons.
- 5. Alternate discharge locations have been considered. One such alternate includes the discharge of treated water to a wetland. This discharge is a part of the remedial process for the mining project. The mine development may cut off the natural water supply for a wetland within the boundaries of the mine site. The effluent discharge is one alternative for maintaining water in the wetland. The wetland may not need the entire volume of water available through the wastewater treatment systems and therefore cannot be

Michael Witt, Chief Wisconsin Department of Natural Resources April 1, 1989 Page 3

considered the primary discharge point for the effluent discharge.

Based on the statements above, water quality based effluent limitations should not be based on NR 207.

As per an agreement developed with the Department, it is our understanding that the WDNR will distribute this report to all appropriate state and federal agencies. Kennecott will distribute this document to appropriate public officials.

We are requesting that the WDNR review this application as expeditiously as possible such that permitting activities associated with the project can continue in a timely manner. If you have any questions or comments as you review this report, please contact us at your convenience.

Sincerely,

KENNECOTT

Zawrina & Mercando

Lawrence E. Mercando Director, Process Development

Enclosure

cc: Robert Ramharter, WDNR (w/30 encl.) John Kaiser, Chairman, Rusk County Board (w/encl.) Robert Plantz, Chairman, Town of Grant (w/encl.) Martin Reynolds, Mayor, City of Ladysmith (w/encl.) Norm Arndt, Rusk County Zoning Administrator (w/encl.) Edwarde R. May, James Askew Associates Inc. (w/encl.) Ladysmith Office, Kennecott (w/encl.) Henry J. Handzel, DeWitt, Porter et al. (w/encl.) Master File (w/encl.)

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LABEL ITEMS I. EPA I.D. NUMBER III. FACILITY MAME V PACILITY V. MAILING ADDRESS VI. FACILITY VI. LOCATION	PLEASE PLACE LABEL IN THIS SPACE	GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the inform- ation carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appeer), please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descrip- tions and for the legal authorizations under which this data is collected.
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EPA ID Number (copy from Item 1 of Form 1)

Form Approved OMB No. 2040-0086 Approval expires 7-31-88

		oplicat	N ion	ew Sources and N for Permit to Discl	ew Dischargers harge Process Wastewate		
NPDES Outfall Location					3		
For each outfa	II, list the latitude a	ind longitude,	and the	name of the receiving water.			
Outfall Number	Latitude	Longitu		Receiving Water (name)			
(list)	Deg Min Sec	Deg Min	Sec				
001	45 26 20	91 07	10	Flambeau River			
002	45 26 30	91 07	20	Flambeau River			
ALT- 002	45 26 20	91 07	20	Wetland Discharge to 1	Maintain Water in a Wetland		
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	(When do you exp	ect to begin di	schargii	ng?)			
August 19	s of Pollution, and	T T					
process w	astewater, san ach operation;	itary waste	water,	cooling water, and stormwa	g wastewater to the effluent, including ter runoff; (2) The average flow contrib ewater. Continue on additional sheet		
Outfall Number	1. Operat	ions Contribut (list)	ing Flov	3: Treatment (Description or List Codes from Table 2D-1			
001	Storm water				2-C (Lime), 2-D (Polymer),		
	mining oper			e II 117 GPM*	2-C (Sulfide), 1-Q, 2-K		
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0C2	Storm water			28 GPM*	1-U 2-C (Lime), 2-D (Polymer)**		
	Type I mate	erial sto	rage	· · · · · · · · · · · · · · · · · · ·	Z=C (Lime), Z=D (Polymer)		
	pile						
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	*Estimated	flows ba	sed o	n average annual preci	pitation		
	**1-U sedir	nentation	is t	he primary form of tre	atment if needed,		
	2-D, poly	mer and	2-C (Lime) will be used to	enhance settling.		
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. Except fe seasona		11, ICaka, UI a	· ·	_		m III-A be interr	
	Yes (complete	the following tab		(go to item IV)			
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ictual produ	applicable prodi	desian), expressi	ed in the terms and	d units used in the	applicable effluen	ed level of producti t guideline or NSPS (attach a separate	5, for each of th
	a Quantity	b Units of					
Year	Per Day	Measure		c Uperati	on, Product, Material,	elc (specny)	

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EPA ID Number (copy from Item 1 of Form 1)

Outfall Number 001

V. Effluent Characteristics

A, and B: These items require you to report estimated amounts (both concentration and mass) of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See table 2D-2 for Pollutants)

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)
B.O.E. mg/1	30	20	4
B.O.E. 1bs/day	228	123	· · · · · · · · · · · · · · · · · · ·
C.O.I. mg/1	50	20	4
C.O.I [.] . lbs/day	480	123	
TOC mg/1	50	20	4
TOC lbs/day	480	123	
T.S.S. mg/1	30	20	1, 4
T.S.S.lbs/day	288	123	
Flow GPM	800	514	1, 4
Flow MGD	1.152	0.74016	
Ammonia (N) $^{(1)}$ mg/1	<2	<2	4
Ammonia (N) ⁽¹⁾	<19	<12.3	
Temperature	Ambient		4
pH s.u.	9.0	6.5	1, 4
Sulfate mg/l	400 ·	300	4
Sulfate lbs/day	3,843	1,852	
Sulfide mg/l	10	5	4
Sulfide lbs/day	96	30.9	
			· · ·
(1) No ammonia will be generat	ed from the	mining opera	tion. This should not be a
permitted parameter.			

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EPA ID Number (copy from Item 1 of Form 1)

Outfall Number 001

Effluent Characteristics

A, and B: These items require you to report estimated amounts *(both concentration and mass)* of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See table 2D-2 for Pollutants)

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)
Aluminum mg/l	<5	<5	4
Aluminum lbs/day	<48	<30.9	
Iron mg/1	1.0	0.3	4
Iron lbs/day	9.61	1.85	-
Magnesium ⁽²⁾ mg/1	40	10	4
Magn∋sium ⁽²⁾ 1bs/day	384	61.7	
Arsenic ug/1	90	5.0	4
Arsenic lbs/day	0.86	0.031	
Copp [,] ≥r ug/1	20 ⁽³⁾	<20 ⁽³⁾	1, 4
Copp [.] er lbs/day	0.192	<0.123	
Mercury ⁽⁴⁾ ug/1	0.5	<0.5	1, 4
Mercury ⁽⁴⁾ lbs/day	0.0048	<0.0031	
Selenium ug/l	200	20	4
Selenium lbs/day	1.922	0.123	
· · ·			
(2) No permit limits should b	e applied to	Mg - this of	nly represents background levels.
⁽³⁾ E?A's document "SW-846" 1	ists a detec	tion limit f	or copper of 20 ug/1.
⁽⁴⁾ Background studies have n			
(1).5 ug/1). No effluent	limit should	be establis	hed.
			·

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EPA ID Number (copy from Item 1 of Form 1)

Outfall Number 001

V. Effluent Characteristics

A, and B. These items require you to report estimated amounts *(both concentration and mass)* of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See table 2D-2 for Pollutants)

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)
Silver ⁽⁵⁾ ug/1	<10	<10	1, 4
Silver lbs/day	<0.096	. <0.062	
Cadnium ug/l	5.0	<5.0	1, 4
Cadnium lbs/day	0.048	<0.031	
Lead ug/1	100	<100	1, 4
Lead lbs/day	0.96	<0.617	
Nickel mg/1	1.0	<0.04	- 1, 4
Nickel lbs/day	9.6	<0.247	:
Zine ug/l	80	<30	1, 4
Zine lbs/day	0.769	<0.185	
Chromium, total ug/l	50	<50	1,4.
Chromium, total lbs/day	0.48	<0.309	
Manganese mg/1	1.0	0.1	
Manganese 1bs/day	9.61	0.617	
:			
(5) EPA's document "SW-846" 1	ists the det	ection limit	for silver at 10 ug/1.
			•
	-		

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EPA ID Number (copy from Item 1 of Form 1)

Outfall Number 002

V. Effluent Characteristics

A, and B: These items require you to report estimated amounts *(both concentration and mass)* of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See table 2D-2 for Pollutants)

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)
B.O.D. mg/1	30	20	4
B.O.D. Ibs/day	2,864	6.73	
C.O.D. mg/1	50	20	4
C.O.D. lbs/day	4,774	6.73	
TOC mg/l	50 ·	20	4
TOC lbs/day	4,774	6.73	
T.S.S. mg/1	30	20	1, 4
T.S.S. lbs/day [.]	2,864	6.73	
Flow GPM	7,950	28	1, 4
Flow MGD	11.448	0.04032	
Ammonia (N) ⁽¹⁾ mg/1	<2	<2	4
Ammonia (N) ⁽¹⁾ 1bs/day	<191	<0.67	
Temperature	Ambient		4
pH s.u.	9.0	6.5	1, 4
Sulfate mg/1	400	300	4
Sulfate lbs/day	38,191	101	· · ·
Sulfide mg/1	10	5	4
Sulfide lbs/day	955	1.68	· · · · · · · · · · · · · · · · · · ·
(1) No ammonia will be gene	erated from th	e mining oper	cation. This should not be a
permitted parameter.			
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Outfall Number 002

V. Effluent Characteristics

A, and B: These items require you to report estimated amounts *(both concentration and mass)* of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See table 2D-2 for Pollutants)

- 1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)
Aluminum mg/l	<5	<5	4
Aluminum lbs/day	<477	<1.68	•
Iron mg/1	1.0	0.3	4
Iron lbs/day	95.48	0.10	
Magnesium ⁽²⁾ mg/1	40	10	4
Magnesium ⁽²⁾ mg/1	3,819	3.36	
Arsenic ug/1	90	5.0	4
Arsenic lbs/day	8.59	0.002	
Copper ug/1	20 ⁽³⁾	<20 ⁽³⁾	1, 4
Copper lbs/day	1.91	<0.007	· · · · · · · · · · · · · · · · · · ·
Mercury ⁽⁴⁾ ug/1	0.5	<0.5	1, 4
Mercury ⁽⁴⁾ lbs/day	0.048	<0.0002	
Selenium ug/l	200	20	4
Selenium lbs/day	19.1	0.007	• .
		-	
(2) No permit limits should	be applied t	o Mg - this	only represents background
levels.			• • • • • • • • • • • • • • • • • • •
(3) EPA's document "SW-846"	lists a dete	ction limit	for copper of 20 ug/1.
	1		in excess of detection limits
(0.5 ug/1). No effluent	limits shou	ld be establ	ished.
	<u>+</u>		
	1	÷	

EPA ID Number (copy from Item 1 of Form 1)

Outfall Number 002

V. Effluent Characteristics

A. and B. These items require you to report estimated amounts (both concentration and mass) of the pollutants to be discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and should be completed in accordance with the specific instructions for that part. Data for each outfall should be on a separate page. Attach additional sheets of paper if necessary.

General Instructions (See-table 2D-2 for Pollutants)

1. Pollutant	2. Maximum Daily Value (include units)	3. Average Daily Value (include units)	4. Source (see instructions)
Silver ⁽⁵⁾ ug/l	<10	<10	1, 4
Silver lbs/day	<0.95	<0.003	
Cadmium ug/1	5.0	<5.0	1, 4
Cadmium 1bs/day	0.48	<0.002	
Lead ug/1	100	<100	1, 4
Lead lbs/day	9.55	<0.034	
Nickel mg/1	1.0	<0.004	1, 4
Nickel lbs/day	95.48	<0.013	· · · · · · · · · · · · · · · · · · ·
Zinc ug/1	80	<30	1, 4
Zinc lbs/day	7.64	<0.01	
Chromium, total ug/l	50	<50	1, 4
Chromium, total lbs/day	4.77	<0.017	
Manganese mg/1	1.0	0.1	
Manganese lbs/day	95.48	0.034	·
(5) EPA's document "SW-846"	lists the def	ection limit	for silver at 10 ug/1.
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CONTINUED FROM THE FRONT	EPA ID Number (copy from Item 1 of Form 1)
C. Use the space below to list reason to believe will be di believe it will be present.	any of the pollutants listed in Table 2D-3 of the instructions which you know or ha scharged from any outfall. For every pollutant you list, briefly describe the reasons y
1 Pollutant	2. Reason for Discharge
None	
-	
-	
VI. Engineering Report on Wastewate A. If there is any technical evaluation	Ireatment In concerning your wastewater treatment, including engineering reports or pilot plant studies, check t
appropriate box below.	in concerning your wastewater treatment, including engineering reports or pilot plant studies, check t
Report Available	No Report
B. Provide the name and loc production facility with res	ation of any existing plant(s) which, to the best of your knowledge, resembles the pect to production processes, wastewater constituents, or wastewater treatments.
Name	Location
	vn to exist which duplicate the combination of ore type,
wastewater constituen	ts, and chosen treatment technology.
1 ····	
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VII. Other Information (Optional)

Use the space below to expand upon any of the above questions or to bring to the attention of the reviewer any other information you feel should be considered in establishing permit limitations for the proposed facility. A:tach additional sheets if necessary.

Please see attached

VIII. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting talse information, including the possibility of fine and imprisonment for knowing violations.

	e Signed
Lawrence E. Mercando, Director, Process Development 322	. 0400
A. Name and Official Title (type or print) (80	

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VII. Other information (Optional)

The following figures can be found in the Preliminary Engineering Report submitted as a supplement to this application:

Site Topographic Map

Site Plot Plan

Flow Diagram - Wastewater Treatment Plant

Flow Diagram - Sedimentation Basin

B. Kennecott Minerals Company proposes to operate an open pit mine. The ore taken from the mine will only be crushed at the site. The crushed ore will be shipped to an out-ofstate processing facility.

Outfalls 001 and 002 will primarily discharge to the Flambeau River. The mine may be interrupting the flow of water to a wetland near the proposed open pit. To mitigate this impact, some or all of the water from outfalls 001 and/or 002 may be directed to this wetland as an alternate water supply. This water will then serve a useful and beneficial purpose.

Flow for outfalls 001 and 002 reflect the stages of mine development. Groundwater and precipitation from the pit will be directed to outfall 002 during preproduction stripping. Once this water has come in contact with the high sulfur waste rock and/or the ore, it will be directed to the wastewater treatment facility for outfall 001. Average flow calculation for Section V of this form reflect pit area discharge through 001.

Simply because a parameter is listed in Section V, Effluent Characteristics, it should not necessarily be regulated through a WPDES discharge permit. This list was prepared with the intention of addressing those parameters listed in Group A and selected parameters which applied to this mining project from Group B. Parameters from the following sections have no applicability to this project: Section 2 Section 3 GC/MS Fraction - Volatile Compounds GC/MS Fraction - Acid Compounds GC/MS Fraction - Base/Neutral Compounds GC/MS Fraction - Pesticides Toxic Pollutant Hazardous Substances

In establishing effluent limits, consideration must be given to analytical methods and their associated detection limits. The instrumentation which will be available on site for analysis will be an Atomic Absorption Spectrophotometer with direct aspiration flame analysis capabilities. The detection limits for these analytical procedures are listed in EPA's document SW846, page 7000-2. The applicable parameters and their detection limits are listed below:

Cadmium	0.005	mg/l
Chromium	0.05	mg/l
Copper	0.02	mg/l
Lead	0.1	mg/l
Nickel	0.04	mg/l
Selenium	0.002	mg/l
Silver	0.01	mg/l
Zinc	0.005	mg/l

In the event that water quality standards present limits which are lower than the detection limits listed above, the detection limits should be used to establish the effluent limits.



