



Board of Commissioners

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May 8, 2012

Ms. Anne Hurlburt, Administrator
City of Scandia
14727 209th Street North
Scandia, MN 55073

RE: Draft Environmental Impact Statement for the Zavoral Mine and Reclamation Plan

Dear Ms. Hurlburt:

Washington County is submitting comments in response to the Draft Environmental Impact Statement for the Zavoral Mine and Reclamation Plan. Washington County finds the Plan generally consistent with the 2003-2013 Groundwater Plan and Washington County Comprehensive Plan.

Attached are comments from the county in response to the Plan. Washington County would like to thank you for the opportunity to review the Draft Environmental Impact Statement for the Zavoral Mine and Reclamation Plan. Please contact Stephen Wensman at 651-430-6701 or via email at Stephen.Wensman@co.washington.mn.us if you have questions regarding the comments.

Sincerely,

Dennis Hegberg, Chair
Washington County Board of Commissioners

- c. Washington County Board of Commissioners
- Molly O'Rourke, County Administrator
- Lowell Johnson, Department of Public Health & Environment
- Amanda Strommer, Department of Public Health & Environment
- Jessica Collin-Pilarski, Department of Public Health & Environment
- Stephen Wensman, Department of Public Health & Environment
- Jim Shaver, Carnelian Marine St. Croix Watershed District
- Judy Sventek, Metropolitan Council

Enclosure: comments

Draft Environmental Impact Statement for the Zavoral Mine and Reclamation Plan

April 2012

Washington County has reviewed the Draft Environmental Impact Statement for the Zavoral Mine and Reclamation Plan (EIS). The county has prepared the following comments to ensure the health, safety and welfare of county residents, ensure environmental compliance, and minimize environmental impact.

I. Aquifer Sensitivity

Given that the mining is proposed to be conducted about 25-50 feet above the water table, there should be no impact to the groundwater quality directly from the mining operations. However, care should be taken to ensure that any hazardous materials on site are properly handled and do not reach the water table.

The groundwater resources identified in the Zavoral Mine site are the Glacial, Prairie Du Chien-Jordan, Franconia-Ironton-Galesville, and Mt. Simon Aquifers. The upper geologic profile, the Glacial Aquifer, is shallow and consists of unconsolidated granular materials with a lack of low permeable soils above them considered to have “high” sensitivity to pollution. Because of the high soil sensitivity, contaminants introduced on the site will most likely reach the groundwater system in several weeks to years.

The existing well, unique number 210498, is a multi-aquifer well and is open across the Franconia, Ironton-Galesville, Eau Claire (confining layer), and into the Mount Simon. This type of well construction is not allowed in MN for new wells; however, because it was constructed in 1969, it is grandfathered. The Minnesota Department of Health recommends reconstructing this well so that it obtains water from only one aquifer.

Department of Public Health and Environment comments:

- Section 2.8, Solid Waste, Hazardous Waste, and Storage Tanks, indicates the possibility of an above ground storage tank (AST), or refueling from a bulk delivery truck. Solid and Hazardous Waste located in the project area shall be disposed of in accordance with Minnesota Rules 7035 and 7045 and Washington County Ordinances #114 and #119. A spill recovery kit must be present during fueling activities used to run equipment at the mine. Containment must be implemented for fuel tank storage.

- Section 5.3, Other Mitigation, recommends that Tiller keep records of when the Zavoral Site Well is pumped, and provide these to the city for groundwater monitoring activities. This data along with all groundwater monitoring data should also be provided to Stephen Wensman, Associate Planner, Washington County Department of Public Health and Environment, 14949 62nd St. N., P.O. Box 6. Stillwater, MN 55082.
- The Minnesota Department of Health recommends reconstructing the well so that it obtains water from only one aquifer. Washington County supports this recommendation. For well reconstruction information and procedures, contact: Patrick T. Sarafolean, Hydrologist, Well Management Section, Minnesota Department of Health at (651) 201-3962.
- The EIS, Sections 4.7.1.5.1, 4.7.1.5.3, and 4.7.1.5.4, denote that there is no significant cumulative effect of well pumping; however the tests were conducted with a prohibition of pumping by Abrahamson Nursery. The cumulative effect of the use of the Zavoral well and Abrahamson's well simultaneously has not been adequately tested. The cumulative effect of both wells running simultaneously should be studied.
- Section 4.7.2, Potential Mitigation Measures, states that mitigation measures are not proposed because significant impacts are not expected as a result of pumping. A mitigation plan should be required in the event significant impacts occur.

II. Transportation Safety

The Zavoral Mine is located at the intersection of State Trunk Highways 95 and 97. With the "build alternatives", the proposed haul route for the mine operations would be on State Highway 97. The primary difference between the alternatives is the duration of the hauling of material (total number of years and number of weeks).

Although these are state highways, the county has safety concerns which are addressed below.

Department of Public Works comments:

- Public Works will support any of the transportation alternatives; however they prefer alternatives 1 and 3.
- Public Works has safety concerns with the dual bi-pass lanes at the intersection of State Trunk Highways 95 and 97 and the mine access driveway.
- Public Works will be rehabilitating County Road 91 in the next few years and will work with residents and businesses regarding traffic operations during the mine operations.