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Waste and Underground Tank Management Bureau
Solid Waste Program
P.O. Box 200901
Helena, MT 59620-0901

RE: Comments - Supplemental EA – Browns Septic Service Inc
Potential pollution of the Bitterroot River

Ladies and Gentlemen:

Thank you for the opportunity to comment on the Supplemental EA. I also commented on the original EA.

My major comment is that the Supplemental EA, specifically the narratives accompanying the photographs in the photo gallery, clearly demonstrate that high groundwater has been present at the proposed sites. Groundwater monitoring during spring runoff is clearly necessary to determine whether the permit will meet legal requirements.

As I understand it, the main reason for a Supplemental EA was to dig pits at the sites and evaluate the soils for signs of the presence of moisture. Contrary to statements in the Supplemental EA itself, the soils clearly show both the presence of water and signs of the presence of water in the past. This information is taken directly from the photos and the photo narratives in the DEQ photo gallery accompanying the Supplemental EA.

These pits were dug during the driest part of the year. If there is moist soil and signs of water in late November, as documented by DEQ in the Supplemental photo gallery, then there will clearly be more moisture present in the spring.

Examples of evidence of moist soils at these sites from the Supplemental photo gallery are as follows:

Photo # Inspection 016 - Site I Pit II

“At 4 ft, trace clay was observed which was slightly moist.”

Photo # 031 - Site I Pit III

“At 4 ft, some orange and white mottling around cobbles. Decomposed white feldspar cobbles.”

According to Dr. James Bauder, of Montana State University Extension: “The presence of mottles is one of the best indicators of alternating wet/dry conditions and less than optimal drainage.”

See: Basic Soils Short Course in Cooperation with Montana DEQ entitled Septic Drainfield Soil Suitability Presentations: Basics of Soil Properties Pertinent to Onsite Septic Drainfield Suitability Assessments; MSU Extension and Water Quality Program. Frame 18.

http://waterquality.montanat.edu/docs/homeowners/Septic_Drainfield_Soil_Suitability_Presentations_/Septic_Drainfield_Presentations_edit.htm

Photo # Inspection 055 - Site II Pit II

“Looking at the dry soil walls. No evidence of groundwater penetration. At 6 ½ ft, light yellowish tan clayey sand, some silt, and some cobbles observed. Slightly moist.”

Note: The description of dry soil walls is inconsistent with the description of the soils being moist.

Photo # Inspection 068 - Site II Pit III

“Top soil is dry dark blackish brown silt and some sand. At 4 ½ to 5 ½ ft a light yellowish tan clayey sand lense can be seen. Soil removed from this area was slightly moist.”

Photo # Inspection 033

This photograph shows Aspen trees either on or very close to Site II. Aspen trees are an indication of high groundwater.

In addition to the above evidence of groundwater at the proposed sites, the photo gallery also indicates that the sites present a high risk of pollution directly to the Bitterroot River.

Photos # Inspection 16 and 17

These photos show a well defined Creek which flows directly into the Bitterroot River ½ mile away. Apparently the Creek is 150 feet (required setback) from the North edge of Site I. However, the ground slopes down from the site to the Creek. Runoff from the site will flow directly into the Creek and the Bitterroot River.

In conclusion, contrary to the assertions in the Supplemental EA, there is clear evidence of the presence of groundwater near the surface at these sites.

Groundwater monitoring during the time of year when the groundwater is at its peak is clearly necessary. There is also evidence of a high risk of septage flowing directly into the Bitterroot River.

Thank you for the opportunity to comment.

Sincerely

Dave Woodgerd

C: Tom Ellerhoff, DEQ, Director's Office
Jeff Ryan, DEQ, Water Protection Bureau
✓ Environmental Quality Council
Director, Department of, Fish, Wildlife & Parks