



LDS Monitoring Requirements

1 message

Justin Bills <Justin.Bills@newmont.com>

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To: "Eschberger - DNR, Amy" <amy.eschberger@state.co.us>, "Cazier - DNR, Tim" <tim.cazier@state.co.us>, Elliott Russell - DNR <elliott.russell@state.co.us>, "Cunningham - DNR, Michael" <michaela.cunningham@state.co.us>

Cc: Justin Raglin <Justin.Raglin@newmont.com>, Ronald Parratt <Ronald.Parratt@newmont.com>, Katie Dehlin <Katie.Blake@newmont.com>, Erik Munroe <Erik.Munroe@newmont.com>

Amy,

Please find page 15 (Appendix III) of the Cyanide Emergency Response Plan, as part of Volume IV of the approved Amendment 11 submittal. The document outlines the monitoring responses and notification criteria for the key solution collection features of the VLFs. The VLFs are managed according to these criteria and have been incorporated into our permit since TR19.

It is important to note that these criteria were established because the LDS design allows both process solution and groundwater to report to the canisters. Unfortunately, it is not realistic or operationally feasible to ensure the canisters are dry at all times. However, the monitoring plan within the permit considers the likelihood of non-process related solution reporting to the LDS canisters, and outlines a system for process solution identification through the analytical criteria, as written.

When CC&V pumps solution from the canisters, a sample is collected and sent for analysis for the criteria included within the permit and field pH is recorded. To date, CC&V has not met this notification criteria and there is no other evidence process solution has/is reporting to any LDS.

Please let me know if you have questions or additional concerns.

Thank you,



Justin Bills

Environmental Manager

T 719.689.4046
M 719.306.3388

justin.bills@newmontgoldcorp.com

Newmont Goldcorp

300 N Third Street

PO Box 191

Victor, CO 80860

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Appendix III

MONITORING RESPONSES

The information presented below incorporates updated criteria for responding to situations which demonstrate significant changes from previous results. The situations outlined below are those which require further action.

- a) Underdrains: The 30-day running average of CN_{WAD}^1 for an underdrain exceeds 1.0 mg/1 and the 30-day running average pH value for the same underdrain for the same period exceeds 9.0;
- b) LDS: The 30-day running average of CN_{WAD}^1 for a LDS exceeds 0.5 mg/1 and the 30-day running average pH value for the same LDS for the same period exceeds 9.0;
- c) HVSCS: The average of the water level readings in the PSSAs exceeds 80 percent of the total capacity in a sustained manner;
- d) LVSCS, LDCRS: The transducers in the LVSCS or LDCRS exceed two feet in a sustained manner;
- e) OLS: The head above the Phase I and II OLS is sustained at greater than two feet on a sustained basis;

$^1CN_{WAD}$ concentrations must be accompanied by a commensurate level of CN_{Free} . In addition, the CN_{Free} concentration in any sample must exceed 0.2 mg/1.

The first response to any of the conditions listed above will be to verify that the measurements are accurate. This may involve re-sampling or revisiting the monitoring location to confirm the initial results. In the event that initial results are confirmed, verbal notice will be provided to the DRMS. Recommendations will be provided to the DRMS regarding further analysis of the situation and, if warranted, appropriate corrective actions. This may include, but not be limited to, providing a written plan to DRMS regarding proposed measures for addressing the situation, changing flow rates to the various portions of the VLF, discontinuing the addition of CN or make-up water, initiating detoxification operations, or other appropriate responses.