



STATE OF
COLORADO

Eschberger - DNR, Amy <amy.eschberger@state.co.us>

Re: Cross and Caribou Mine Issues

Jacob Dyste - CDPHE <jacob.dyste@state.co.us>

Wed, Feb 5, 2020 at 1:17 PM

To: "Cunningham - DNR, Michael" <michaela.cunningham@state.co.us>

Cc: Amy Eschberger - DNR <amy.eschberger@state.co.us>

Attached is Calais Resources' Compliance Advisory Response. It provides some new information about the situation at the mines.

Jacob

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Jacob Dyste
Enforcement Specialist



COLORADO

Water Quality Control Division

Department of Public Health & Environment

P 303.692.3290

4300 Cherry Creek Drive South, Denver, CO 80246

jacob.dyste@state.co.us | www.colorado.gov/cdphe/wqcd

24-hr Environmental Release/Incident Report Line: [1.877.518.5608](tel:18775185608)

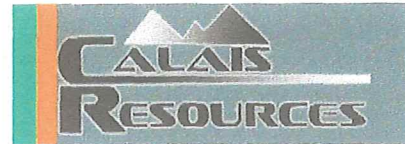
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Calais Resources Compliance Advisory Response.pdf

1097K

4415 CARIBOU RD
NEDERLAND, CO 80466-0653
516-582-0833



January 30, 2020
Mr. Jacob Dyste
Enforcement Specialist
Colorado Dept. of Public Health and Environment
CWE-WQCD-P2
4300 Cherry Creek Dr. South
Denver, CO 80246

Received
FEB 05 2020
Water Quality Control

RE: Compliance Advisory Response; January 17, 2020 Compliance Advisory

Dear Mr. Dyste,

Calais Resources Inc. (Calais) has received the compliance advisory dated January 17, 2020 under CDPS permit CO0032751. This letter serves as the compliance advisory response. As you know, the site has undergone an enormous loss with the passing of the previous permittee, Thomas S. Hendricks, on January 6, 2020 following a prolonged illness. Mr. Hendrick's passing has left the mine scrambling to fill his significant shoes and trying to catch up on issues that may not have captured Tom's full attention as his health failed. Tom is now interred on mine property at the historic Caribou Cemetery, forever a part of the land he loved. Those who knew Tom have appreciated the sympathetic responses received from state and local officials as we work through this rough transition.

I, Richard Mittasch, Vice President of Calis Resources Inc., am taking over as the permittee, a Change of Contact Form (attached) was sent on January 29, 2020 to that effect. Briana Greer will continue as the DMR cognizant official. As discussed with Mr. Dyste by both Ms. Greer and Mr. Pollock, Mr. Daniel Pollock is joining the team as the Operator in Responsible Charge. Mr. Pollock is currently a Class C residential operator with the Town of Nederland. Mr. Pollock has fast-tracked his Industrial Class D test to Feb. 6, 2020. Ms. Greer, a geochemist specializing in mine water quality, was brought on in December to help address compliance challenges. She will remain as the DMR cognizant official.

Regarding reported effluent violations and notice of significant non-compliance, Calais recognizes these violations and Calais is working to address them. In many of the past DMR cover letters Mr. Hendricks discusses the need for rehabilitation at the Idaho Tunnel. The collapsed Idaho Tunnel (which discharges better quality water than the Cross portion of the discharge) created a difficult to manage situation with



respect to water quality and quantity on the Caribou side of the Mine. Recognizing the likely deleterious effects of the collapse, Calais moved to rehabilitate the tunnel.

In November 2019 a contractor was mobilized to begin work in the tunnel. Mine staff report that in late November the contractor mistakenly broke piping that carried the tunnel effluent to the pond where it mixed with the Cross water. That connection has been fixed as of January 29, 2020. However the Idaho Tunnel rehabilitation is not yet complete, so full access to the water has not yet been achieved. Calais continues to work the contractor to rehabilitate the Idaho Tunnel, and believes this will improve water quality.

Calais believes that the potentially dissolved lead exceedances of June and July, as well as the potentially dissolved cadmium and zinc exceedances of October and November 2019 are directly related to the disturbance in flow caused by the tunnel collapse and subsequent rehabilitation. Calais is working to find a skid mounted water treatment system to use on the site temporarily until construction is complete and more permanent solutions can be evaluated.

In addition to bringing on additional environmental support staff and continuing to rehabilitate the Idaho Tunnel, Calais began an Environmental Audit in December of 2019. While not yet in receipt of the final audit report, Calais has begun to address the following identified issues:

- **Stormwater Management Plan:** Auditors found that an inadequate Stormwater Management Plan existed for the site (CDPS COR 040242). To facilitate creation and construction of an adequate Stormwater Management Plan, Calais is in contracting with a surveyor to ground-truth open source LIDAR data. The resultant map will be used for preliminary stormwater design. The preliminary stormwater design will allow Calais to estimate costs for final design and construction expected to occur in late summer 2020.
- **Invalid Silver Data:** October and November potentially dissolved silver results were reported as NODI code "H" or "Invalid Test" because the lab had indicated reporting limits above the Permit PQL with a non-detect result. A January 10, 2020 Compliance Advisory for an Incomplete DMR was issued as a result. After coordinating with the Laboratory, reporting limits were corrected. Revised DMRs have subsequently been submitted (attached).
- **Expanded Monitoring Program:** Auditors found that while the existing, recently upgraded, monitoring at the permitted outfall met permit obligations, additional data is need for sound water management strategy. Calais has already expanded the analytical suite at the outfall to include common ions. The addition of common ions will allow for the use common hydro-

chemical tools such as piper diagrams, to evaluate overall trends in water quality and source. Additionally, these parameters are important consideration in water treatment. The topographic data being obtained for Stormwater Management serve to evaluate additional upstream and downstream monitoring locations and expand groundwater monitoring locations.

Calais appreciates the opportunity to work with the Division in bringing this Project into compliance. Please feel free to reach out with any questions or concerns.

Sincerely,



Richard D. Mittasch
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ATTACHMENTS:

Change of Contact Form
Revised October 2019 DMR
Revised November 2019 DMR

