

**COLORADO** Division of Reclamation, Mining and Safety Department of Natural Resources

1313 Sherman Street, Room 215 Denver, CO 80203

July 2, 2021

Brian Briggs Ouray Silver Mine, Inc. PO Box 564 Ouray, CO 81427

## RE: Revenue Mine, Permit No. M-2012-032, Technical Revision (TR-14) Approval, Commitments and Inspection Schedule

Dear Mr. Briggs:

On July 2, 2021 the Division of Reclamation, Mining, and Safety (Division) **approved** the Technical Revision request (TR-4) submitted on April 16, 2021, addressing the following:

*Environmental Protection Facility (EPF) certification plan for the Reagent Room portion of the previously approved mill filter building extension, permitted under TR-09.* 

Construction of the Reagent Room as proposed in TR-14 and its supplemental documentation may now commence.

Throughout the course of the review of TR-14, the Division has identified the following phases of construction, which include the critical inspection points to be completed by the Division. Notification of completion of the current construction phase and request for inspection shall be provided to the Division at least 72 hours prior to the requested inspection, and can be sent via email. QA/QC documentation including the running table for the completed phase shall be provided to the Division at the time of request for inspection.

Phase/Task	Areas / Items to be inspected (includes but is not limited to)			
<b>1</b> Existing construction / disturbance	All existing disturbances, including excavation, concrete and any other construction improvements completed prior to this revision approval with regards to the Reagent Room.			
<b>2</b> Remaining excavations, concrete prep work	Excavations to bedrock, compacted soils, forms, rebar/reinforcements for footers, slabs or curbing. *If multiple pours/reinforcements are required, inspections between each subsequent pour may be required.			
<b>3</b> Building Erection (Concrete Work)	Concrete flat work, partition walls, exterior walls, verification of sealant between pours for partitions, walls or secondary containment structures.			



Brian Briggs OSMI Page 2 of 4 July 2, 2021

<b>4</b> Building Erection (Structural Steel)	Steel superstructure, construction joints (bolts), sheeting.				
<b>5</b> Secondary Containment	All secondary containment structures including enclosed rooms, with epox coatings.				
<b>6</b> Equipment Installation	All tanks, storage racks, piping, delivery lines, sump systems.				
<b>7</b> Final	Completed construction inspection. Final sign off of all QA/QC tasks. Energizing of lines, equipment testing, pressure tests of lines and any final checks that are done after the equipment is installed.				

\*additional inspections may be required if the entirety of each phase cannot be completed within one inspection.

Upon completion of construction, certified inspections and submittal of all QA/QC documentation including as-built certifications the Division will issue an EPF Certification for the facilities proposed under TR-14. Please note that no chemicals may be imported, stored or used on site until such time as the EPF has been certified by the Division.

Also, throughout the application and review process of TR-14, commitments were made by OSMI that are now incorporated into the permit file. Those commitments are;

- 1. EPF Certification and QA/QC: Notification of completion of the current construction phase and request for inspection shall be provided to the Division at least 72 hours prior to the requested inspection, and can be sent via email. QA/QC documentation including the running table for the completed phase shall be provided to the Division at the time of request for inspection.
  - a. Provide all QA/QC documentation including change orders or alteration documentation for each respective phase of construction as it is completed. These should be provided in addition to the as built drawings and certifications for the components it applies to.
  - b. During the submittal of the as-built certifications of the reagent room, the final drawings of the building will identify the location of the septic tank leach field.
- 2. **Chemical Handling:** The Division has evaluated the specific chemicals listed in Table 4 (enclosed). All necessary information under Rule 6.4.21(5) has been provided and the Division is approving the use of the chemicals (these chemicals are manufacturer specific).
  - a. If an approved alternative is being switched out, written notification and acknowledgement of the change in chemical use will be required prior to the change being implemented. Please note that this notification should be submitted under a separate cover.

Brian Briggs OSMI Page 3 of 4 July 2, 2021

- b. For any new chemicals that may be used as a substitution that are not included in Table 4, so long as the chemical is comparable to what is already approved, a written notification along with the SDS of the proposed chemical must be submitted to the Division prior to use. Acceptance or denial of the substitution will be provided by the Division within 14 days. If the chemical is different in its makeup that substitution would need to be addressed through the Division's Technical Revision Process.
- c. OSMI has committed to removing designated chemicals within 30 days of the date of approval of Temporary Cessation.
- d. OSMI has committed to storing containers on secondary containment for containers with liquid chemicals that are to be returned to the manufacturer or are awaiting results of waste determination testing.
- 3. **Quarterly Milling Report:** OSMI will submit a Quarterly Milling Report that includes tons of ore processed, volumes of chemicals used to process the ore and a balance sheet describing what chemicals have been shipped to the site, consumed during milling operations and containers or chemicals disposed of. Said report will be due within 30 days of the end of the previous quarter.
  - a. Q1 (January 1 to March 31) is due by April 30;
  - b. Q2 (April 1 to June 30) is due by July 30;
  - c. Q3 (July 1 to September 30) is due by October 30;
  - d. Q4 (October 1 to December 31) is due by January 30.

At this time the Division is not certifying the mill for long term storage of additional reagent chemicals. OSMI has committed that chemicals to be located within the mill shall be for short-term temporary storage during times of maintenance or housekeeping within the reagent room.

- a. No more than two different reagents shall be stored within the mill at any given time;
- b. The total volume of reagents stored in the mill building shall go towards the site total maximums to be stored on site.

The terms of the TR-4 approved by the Division are hereby incorporated into Permit No. M-2012-032. All other conditions and requirements of the permit remain in full force and effect.

If you require additional information, or have questions or concerns, please feel free to contact me. Lucas West at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 303-866-3567 Ext 8187 or via email at lucas.west@state.co.us. Sincerely,

Lucas West Environmental Protection Specialist

Brian Briggs OSMI Page 4 of 4 July 2, 2021

Enclosures: Table 4 - Reagent List

Cc: Travis Marshall, Senior EPS, Grand Junction DRMS

Reagent	Manufacturer	Purpose of use	Alt Names	Human Health 52: SDS HCS 2012 (29CFR 1910.1200)	Environmental Impacts §12: SDS	PPE §8: SDS	NFPA - Classification §16 SDS	EPA List of Lists §12 SDS	Corrosivity	Incompatible Materials
AeroFloat 242 Promoter	Solvay (distributor for Cytec Industries Inc.)	This is the ammonium sail of AEROFLOAT 31 promoter: Widely used for floation of Pb from Pb/Zn ores and CuiPb from CuiPb/Zn ores. Improves Ag recovery from these ores.	NA	Acute toxicity, Category 4 — H402: Harmful if swallowed Acute toxicity, Category 3 — H431: Toxic in contact with skin Skin Corrosin, Category 16 — H4314; Causes server skin burns and eye damage Serious eye damage, Category 1 — H431: Rouses anilerup: skin reaction Skin Sensitzation, Category 1 — H431: Suzues an allergic skin reaction Reproductive toxicity, Category 2 — H431: Suzected of damaging fertility or the unborn child Specific target organ toxicity - repeated exposure, Category 2 — H437: Suzected for damaging fertility or the unborn child repeated exposure.	Acute toxicity to 54 hr. ca.66mg/L Rainbow tr Acute toxicity to daphnia and other aquatic invertebrates. Not tested Toxicity to aquatic plants. Not tested Toxicity to microorganisms. Not tested Mr Factor Amnonium Nydroxide Acute aquatic toxicity = 1 Biodegradibility < 70% - 28 Days Toxicity to benitro granisms. Not tested Toxicity to benitro granisms. Not tested Toxicity to terrestrial plants. Not tested Toxicity to above ground organisms. Not tested	Chemical resistant, lightly fitting goggles Impervious clothing Change working achter each shift Handle in accordance with good industrial hygiane and safety practice Wash hands before breaks at the end of workday When using do not eat, drink or smoke Eye wash bottler/station: compliance with applicable standards Ensure that eyewash stations and showers are close to the workstation location	Heath - 3 Serious Flammability - 1 Slight Instability or Reactivity - 0 Minimal	Ammonium HydroxideCAS - No. 1336-21- 6 1000b	Not classified re: corrosion of metals	Oxidizing agents, strong acids or bases, and amines
Danafloat 067 (alternative to AeroFloat 242)	Quadra Chemicals Inc.	Floatation Agent	NA	Acute taxicity, Category 4 — H021: Hormful if swallowed Acute toxicity, Category 3 — H0311: Toxic in contact with skin Skin Corrosion, Category 1 — H1314: Causes severe skin burns and eye damage Serious eye damage, Category 1 — H318: Causes serious eye damage	Acute EC50 5 to 10ppm Marine Water - Species: Algae -macrocystic Exposure 4 days pyffera - young Acute EC50 7000 µgl fresh water - Crustacears - Cammanus 44 Hours fasciatus Acute LC50 10000 µgl fresh water Fish - lepomis macrochirus 96 Hours	Chemical resistant, sightly fitting goggles Impervious dothing Change working dothes after each shift Handle in accordance with good industrial hygiane and safety practice Wash hands before breaks afte end of workday When using do not eat, drink or smoke Eye wash bottles/stations in compliance with applicable standards Ensure that eyewash stations and showers are close to the workstation location	Health - 3 Flammability - 0 Phsyical Hazards - 0	Ammonium O, O-bis(methylphenyl) dithiophosphate 49-51 % CAS -No. 87373-83-4 mix-cresol 0-7% CAS No. 1319-77-3 amoonia 0-7% CAS No. 1336-21-6	Corrosive to the respiratory system and digestive tract	Acids
Aerophine 3418 Promoter	Solvay (distributor for Cytec Industries Inc.)	AEROPHINE 3418A has application in botto of cooper- and lead- suffice minerals, particularly where these are found in complex suffice ones containing sphatente zizn mineralization, and ones with high levels of pyrite and/or pyrrhotite.	NA	Serious wy damage, Category 1 — H1316. Causes serious wy damage Stie sensiticantion, Sub-Category 11 — H1017. Mw zawae an allengic stir neation Health hazards not otherwise classified, Category 1 → Contact with acids liberates toxic gases	Acute toxicity to fish Not harmful (LC LL50-100mg(L)) Acute toxicity to daphnia and other aquadic investmentatives. Not harmful (ECEL50-100mg(L)) Toxicity to microorganisme. Not tested Chronic toxicity to tasking to tasking Chronic toxicity to shift hort tested Toxicity to advetting organisme. Not tested	Impervicus grows - Nitrile or fuormated rubber gloves Chemical resistant googles, tightly fitting Impervicus dothing Full protective suit Change working dothes after each shift contaminated work dothing should not be allowed out of the workplace Handle in accordrace with good industrial hygiene and safety practice Wash hand's before breaks and at the end of workday When using do not ad, dirk, snoke Eye wash bottles/stations in compliance with applicable standards Ensure that eyewash stations and safety showers are close to the work station location.	Health - 3 Serious Flarmability - 1 Slight Iinstability or Reactivity - 0 Minimal	N/A	Not corrosive to metals	Mineral acids, strong oxidizing agents, strong acids or bases
Copper Sulfate Pentahydrate	Quadra Chemicals LTD,	Used in Zinc flotation as an activator of sphalente	cupric sulfate, blue vitriol, bluestone	Acute Toxicity - Oral Category 4→ Harmful if swallowed Skin Corresion/Inflation Category 2→ Harmful in contact with skin Eye damage/Inflation Category 2→ Eye damage/Inflation	Ecotoxichy Very toxic to aquatic life with long to Persistence and degradability Not determined Bioaccumulation Not determined Mobility May be mobile due to water solubili Other Adverse Effects Not Determined	Long sleeved shirt, long pants, and shoes plus socks Water proof gloves	Health - 3 Serious Flammability - 0 Instability or Reactivity - 0 Minimal	CAS/313 Category Codes N100 & (CERCLA) 313	Mildly corrosive to steel	Aluminum powder, acetylene gas, hydroxylamine, magnesium and moisture
Hyperfloc AF 309	SNF, Inc.	Used as a settling agent, A flocularit causes the suspended mineral to form to small masses. This will make the thickener load settle.	NA	No known hazards to humans Aqueous solutions or powders that become wet render surfaces extremely slippery	Acute toxicity to fish ECS0Dario rend;96 hours > 100m; Acute toxicity to invertificate. ECS0Fathead minnovi96 hours > Acute toxicity to alige ECS0Facendesmus subspicatus?? Chronic toxicity to insh No Data Chronic toxicity to invertificate. No Data Toxicity to microorganisms No Data Effects on trensfath organisms. No known effects Sediment toxicity No Data	100mg/L (OECD 203) Plastic material gloves	Health - 0 Flammability - 0 Instability - 0	CERCLA - Hazardous substances list (40 CFR 302.4) - RQ - Not concerned	Not classified re: corrosion of metals	Strong bases, oxidizing agents
Hydrated Lime	Lhoist North America	Line is used to adjust the pH to aid in the collector adsorption by controlling the pulp chemistry. It also aids in the depression of certain minerals	NA	Eye damage Category 1 — Serious eye damage Carcinogen Category 2 — Seini ritration Specific Target Organ Toxicity Single Exposure Category 3 — Damage to Largs through prolonged or repeated exposure Specific Target Organ Toxicity Repeat Exposure Category 3 — Damage to Largs through prolonged or repeated exposure Cancer potential through inhalation Hydrated line is not listed as a carcinogen, however this product contrains crystaline Size, which is dassified as carcinogenic to humans when inhaled.	Reacts with atmospheric CO2 overtime to form calcium carbonate Calcium Hydroxide 13mg/m305-62. No bioaccumulation effect or food chain concentration toxicity 5 mg/m3 (respirate) Minimal mobility in soil. Reacts with clay portion of soil to form calcium ACGIH TLV: 5 mg/m3 silicates and calcium atuminates Magnesium Oxde 1309-48-4 OSH. This material is alkaline and if released into water or moist soil will ACGIH TLV: 10 mg/m3 cause an increase in pH. Crystalline Silica 14808-69-7 OSH TWA (respirate) ACGIH TLV: 0.025 mg/m3 (respira	Safety Glasses with side shields or safety goggles. Contact lenses should not be work when working with the lime products. A PEL: 15 mg/m3 Wear appropriate clothing and gloves to prevent contact Eye wash fountain and emergency showers close to work station location A PEL: 0.050mg/m3 as an 8 hr.	N/A	NA	Not classified re: corrosion of metals	Acids, reactive fluoridated or brominated compounds, reactive powdered metals, organic acid anhydrides, nitro-organic compounds, reactive phosphorous compounds, interhalogenated compounds
Oreprep F-549 Frother	Solvay (distributor for Cytec Carrado Inc.)	A forthing agent used to create a stable surface for sulfide mineral to adhere.	NA	Skin initiation Category 2— H915 Causes skin initiation Eye initiation Category 2A → H319: Causes serious eye initiation	Acute toxicity to faith to Data Acute toxicity to daphnia and other aqualic invententivates. No Data Toxicity to invententivates No Data Toxicity to invententivates No Data Chronic toxicity to faith No Data Chronic toxicity to faith No Data Acido degandation No Data Physical and photo-chronical alimination No Data Biologizgatadition No Data Acido potential No Data Acido potential No Data Results of PBT and YP-8 assessment No Data Other advesse effects No Data	Store in a well vernitated area Chemical resistant goggest striht fitting Impervicus scholing Change work clothes after each work shift Contaminated work clothing should not be allowed out of the workplace Handle in accordance will good industated Hygiane and safety practice Wash hands before breaks and at end d workday Do not eat, dirink or smoke while using this product.	Health - 2 Moderate Flammability - 1 Instability or reactivity - 0 or Minimal.	NA	Not corrosive to metals	Strong oxidizing agents
Polyfroth W20 (Alternative to Oreprep)	Quadra Chemicals Inc.	A frothing agent used to create a stable surface for sulfide mineral to adhere.	NA c	While this material is not considered hazardous by the OSHA Hazar Communication Standard (29 CFR 1910.1200), this SDS contains valuable information critical to the safe handling and proper us o the product. This SDS should be retained and available for employeed s and other users of this product. No known significant effects or critical hazards.	No known significant effects or cinitical hazards. Ecotoxicity - Not available Persistence and degradeability - Not available.	Chemical resistat, impervioud gloves, complying with an approved standard should be worn at tall times when handling chemical products if a risk assessment indicates this is necessary	Health - 0 Flammability - 0 Instability - 0	NA	NĂ	No specific test data related to reactivity available for this product or it's ingredients. The product is stable Under normal conditions of storage and use, hazardous reactions will not occur.
Sodium Isopropyl Xanthate Flottec SIPX Collector	Charles Tennant & Copmany	Xanthate is commonly used in the flotation process of sulfide minerals. Xanthate is a combination of alcohol, sodium hydroxide and carbon dioxide, which is an anionic collector.	NA	Sodium Isopropykanthata → Proxan Sodium (Synonym) Self heating substances and mixtures Category 1 → HC51: Self Heating; may catch fire Acute toxicity (orail: Category 4 → H302; Harmful if swallowed Acute toxicity (colema) Category 4 → H305: Causes skin Irritation Eye irritation Category 2 → Catches Fire spontaneous/i / exposed to air → Harmful if swallowed or in contact with skin → Causes skin Irritation →	Acute Aquatic Toxicity Category 2 — H411: Toxic to aquatic life long last Chronic Aquatic Toxicity Category 2 → Do not allow to enter soil, water ways or waste water. This product may be harmful to aquatic life Biodogradability All waste from this product including all empty containers must be disposed of in accordance with municipal, provincial and federal regulations.	Ing effects Wear impervious gloves when there is greater exposure risk. If respiratory protection is required institute a complete respiratory protection program including selection, fit tasting, training, maintenance and inspection. NIOSH or MSHA approved respirator for acidic vapors Face shield, safety glasses with side shields. Safety Boot Adequate protective cohting An eye wash station/safety shower should be near the work station Explosion proof mechanical ventilation to limit vapor concentration below T.L.V.	Health - 2 Flammability - 0 Instability - 2	CASI313 Category Codes 7440-23-5 CERCLA RQ 10	Not classified re: corrosion of metals	Strong oxidizing agents, strong acids, strong bases, flammable liquids, heat, moisture
NAX 31 (Sodium Isopropyl Xanthate alternative)	Prospec Chemicals (Charels Tennant & CO 3rd party supplier of Xanthate. Cascade columbia is a Distributor for Charles Tennant).	Xanthate is commonly used in the flotation process of sulfide minerals. Xanthate is a combination of alcohol, sodium hydroxide and carbon dioxide, which is an anionic collector.	NA	Acute Toxicity Oral Category 1— Harmful if swallowed Acute Toxicity Dermal Category 4— Hermful in contact with skin Acute Toxicity Skin Hradina — Wash with pienry of soap and water Eye inflation Category 2— Eye damageInritation Danger Category 2→ NA	NA NA	Wear impervious gloves. If respiratory protection is required, institute a complete respiratory protection program including selection, fit testing, training, maintenance and inspection. Refer to teh CAS standard 294.4 mBy 25 election, care and use of respirators. If vagos are present, use a NIOSH or MSHA approved respirator for addic vapours or a self contained breathing apparatus. Face shield, safety goggles. Rubber safety boots, adequate protective dothing. Eye wash station and safety shower should be mare the work area.	NA	NA	Not classified re: corrosion of metals	Strong oxidizing agents, strong acids, strong bases, flammable liquids, heat, moisture
Sodium Metabisulfite	Quadra Chemicals LTD. (Prospect Chemicals 2nd/3rd party distributor/supplier)		Sodium Pyrosulfite, Disodium Pyrosulfite, Pyrosulfurous Acid, Disodium Salt, Sodium Disulphite.	Acute Toxichy Oral Category 4 — Harmful if swallowed Acute Toxichy Dermal Category 5 — Harmful in contact with skin Serious Eye Irritant Category 1 → Eye damageIinitation	Ecotoxicity: Sodium Metabisuffile is a non hazardous solid commonly used as a waste water dechlorination agent. High concentrations will contribute to elevated chemical oxygen demand in aquatic environments.	General and local exhaust ventilation systems to maintain airborne concentrations If necessary, wear and MSHANIOSH approved respirator. Protective boots, gloves, and dochting to prevent excessive skinic contact. Protective ey glasses, safety glasses with side shields, or goggles. emergency eye wash stations, showers, and washing facilities available in the work area. Remove this material form PE as needed. Do not eat, drink or smoke in work areas.	Health - 2 Serious Flammability - 0 Instability or Reactivity - 0 Minimal	Hazardous Substance (40 CFR 302.4) RQ N/A	Not classified re: corrosion of metals	Acid and water produce sulfure oxides. Powdered potassium, sodium metal, alkali agents, oxidizing agents, and chlorates.
Zinc Sulphate Monohydrate	Zinc Nacional	The established lead- zinc ore floation processing scheme is to add zine sulphate (ZSNG4) to the grind to control metal ion activation (sphalerite depression)Shalerite that is rejected into the lead floation table after activation with copper sulphate.	White vitriol, Goslarite	Acute aquatic toxicity Category 1 → H302: Harmful if swallowed Skin corresion/Intration Category 2 → H315: Causes skin intration Serious eye drange Category 1 → H318: Causes serious aye dranage Specific target organ toxicity, single exposue, Respiratory tract H335. May cause respiratory inflation initiation Category 3 → H410: Very toxic to aquatic life with long lasting effects Hazardous to the aquatic environment, long-term hazard Category 1-	LCS0 24 Hours fah (rainbow trout) 1.24 mg/L Zinc Sulphate has a high water soi LCS0 48 Hours fah (rainbow trout) 2.4 - 5mg/L LCS0 96 Hours fah (rainbow trout) 2.4 - 5mg/L LCS0 96 Hours Fah (rainbow trout) 2.4 - 5mg/L LCS0 96 Hours Daphnia 7.4 mg/L and dissolved organic carbon levels	o available. The zinc may be should be worn where dust is generated and there is a potential that eye contact may occur. Use adequate local or general ventilation where necessary to maintain the concentrations of dust well	§ 5 Fire Fighting Measures	CERCLA RQ 1000 Section 313c	Not classified re: corrosion of metals	Strong oxidizers, acids, strong bases