



July 7, 2021

Miguel Hamarat
Climax Molybdenum Company
P.O. Box 68
Empire, CO 80438

**Re: Climax Molybdenum Company; Henderson Mine; File No. M-1977-342;
Technical Revision No. 34 (TR-34); Environmental Protection Plan Revision Adequacy
Review**

Mr. Hamarat,

The Division of Reclamation, Mining and Safety (Division/DRMS) reviewed the contents of Technical Revision No. 34 (TR-34) - Environmental Protection Plan (EPP) Revision received on March 5, 2021 and submits the following comments.

1. On Page 7 of 40, Section 5 – Designated Chemical Evaluation, the Operator states the Henderson Mine does not use designated chemicals as part of the mining activities. The permit boundary for the Henderson Mine was increased to include the URAD WTP and water conveyance pipeline from the Henderson Mine to the URAD WTP in Amendment No. 7 (AM-07). The amendment was approved by the Division on May 4, 2020. The URAD WTP is an Environmental Protection Facility (EPF) and uses designated chemicals to removed metals from the mine water. Please update the revised EPP to state designated chemicals are used at the Henderson Mine in the URAD WTP and provide a list, description and storage location for the chemicals.

The EPP revisions for designated chemicals at the Henderson Mine include but are not limited to the following sections:

- Section 2.3 Site Figures – Figure 1
 - Section 5.1 – List of Chemicals and Specific Locations
 - Section 6.1.1 – Designated Chemicals Handling
 - Section 6.1.1.1 – Temporary Cessation
 - Section 6.1.1.2 – Final Closure
2. On Page 8 of 40, Table 5-1 Designated Chemicals Used at the Henderson Mill, the Operator lists the maximum quantity of Sodium Hydroxide stored at the Mill as 25,100 gallons. As identified during the April 4, 2021 inspection, the Sodium Hydroxide Storage head tank is listed as 500 gallons in the EPP, however the tank has a capacity of 2,000 gallons. Please update Table 5-1 to



indicate the maximum quantity of Sodium Hydroxide stored at the Mill as 26,600 gallons.

3. On Page 21 or 40, Mill EPF 2.1 – Sodium Hydroxide Storage, the Operator states liquid sodium hydroxide continues to be stored in two 12,300 gallon tanks located in this building (Nokes building) as well as a 500 gallon head tank inside the Mill building. As identified during the April 4, 2021 inspection, the Sodium Hydroxide Storage head tank has a capacity of 2,000 gallons. Please update the Mill EPF 2.1 section to indicate the volume of the head tank as 2,000 gallons.
4. On Page 30 of 40 – 10.2 Stormwater Management Plan, the Operator states a copy of the current SWMPs can be provided upon request. Please submit copies of the approved SWMPs for the Henderson Mine and Mill sites for the Division's file.
5. On Figure 4 – Henderson Mill EPFs, the map indicates TDL drop towers 17 and 8-16. Drop towers 17, 15 - 16 and 13 - 14 were removed from the TDL under technical revisions no. 20, 22 and 24, respectively. Please update Figure 4 to indicate the current configuration of the TDL.
6. On Page ii of the Environmental Incident Response Manual (IRM) for the Henderson Mine, the Table of Contents has four (4) sections listed as "Error! Bookmark not defined." Please provide a copy of the Table of Contents for the Henderson Mine IRM with all sections bookmarked.

Please be advised the technical revision for the Henderson Mine may be deemed inadequate, and the revision may be denied on August 2, 2021, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division.

If you have any questions, please contact me at peter.hays@state.co.us or (303) 866-3567 Ext. 8124.

Sincerely,



Peter S. Hays
Environmental Protection Specialist

Ec: Jared Ebert; DRMS
Geoff Niggeler; Henderson