



August 31, 2021

Angela M. Bellantoni Ph.D.
Environmental Alternatives, Inc.
P.O. Box 326
Canon City, CO 81215

Re: Salisbury Gladstone LLC; Gladstone Toll Mill; File No. M-2021-007; Designated Mining Limited Impact (110d) Operation Reclamation Permit Application Fourth Adequacy Review

Ms. Bellantoni:

The Division of Reclamation, Mining and Safety (Division/DRMS) reviewed the contents of the Salisbury Gladstone LLC permit application adequacy response received on August 19, 2021 for the Gladstone Toll Mill, File No. M-2021-007 and submits the following comments. The Division is required to make an approval or denial decision no later than September 15, 2021 therefore; a response to the following adequacy review concerns should be submitted to the Division as soon as possible.

6.3.3 EXHIBIT C - MINING PLAN

1. On Page 5 of 23, the Applicant states the byproduct material owner will submit application for a Beneficial Use Determination (BUD) from CO Department of Public Health and Environment (CDPHE) Hazardous Waste Management Division. The Division consulted with the CDPHE Material Management Unit regarding which entity, the Applicant/Operator or the byproduct material owner, would be required to hold the BUD for the byproduct material. The CDPHE representative state they would require the Applicant/Operator to hold the BUD for the byproduct materials. Please revise Exhibit C and the Toll Mill Agreement accordingly.
2. On Page 6 of 23, the Applicant states the fluidized feed stream is conveyed to four shaker tables requiring *on* 15 gpm per table or 45 gpm total. The Division believes the Applicant meant to state the total feed stream for the four tables would be 60 gpm. Please review the statement and revised Exhibit C accordingly.
3. On Page 6 of 23, the Applicant states both Quicklime and Sodium Bisulfate will be used in the milling process to control the pH level in the process water. Please provide Material Safety Data Sheets (MSDS) for the chemicals proposed in Exhibit C.



4. On Page 6 of 23, the Applicant states the (Quicklime and Sodium Bisulfate) pallets and drums will be tarped and stored within a curbed and dry containment area at the plant site. Please provide the dimensions for the containment area and confirm the containment area is sized appropriately to contain 110% of the maximum proposed stored amount of chemicals (2,000 pounds each).
5. On Page 6 of 23, the Applicant states the byproduct storage pads will be 30' x 30'. On E1.2b Section Views and Details – Sheet 10 of 10, the figure indicates a 45' x 20' byproduct storage pad. Please explain this discrepancy the update Exhibit C and/or the figure accordingly. Additionally, Note #1 on the figure states “60x40 Storage”. Please revise the note to indicate 45x20 storage in the plan view detail.
6. On Page 6 of 23, the Applicant states the settling ponds for the recirculating process water system are 22' by 26'. Please provide figures with plan and side elevations for the process water settling ponds.
6. In response to Item #15, the Applicant states the Closed Circuit Mill Flow Chart is revised to include the byproduct storage bin. The updated flow chart removed the water sampling station, contaminated sand holding area, contaminated water tank and the process water tank as indicated on the July 1, 2021 chart. Please note: the Applicant may have renamed the process water tank as the clean water tank. Please provide a mill flow chart indicating all aspects of the proposed milling process.

6.3.9 Exhibit I - Proof of Filing with County Clerk

7. Please provide an affidavit or receipt indicating the date on which the revised application documents were placed with the Clear Creek County Clerk and Recorder in response to this letter. Please note, the application documents are not required to be recorded by the county clerk, however the documents must be available for public review at the county clerk's office.

Appendix F - Toll Milling Agreement

8. The Applicant removed the Byproduct Analysis and Concentrate Analysis Addendums from the revised Toll Mill Agreement. Please confirm the Applicant intended to remove the addendums from the agreement.
9. The Applicant states in the adequacy response letter items #10 and #11 of the Milling Agreement includes characterization of both feedstock and byproduct material. The revised Toll Milling Agreement submit with the adequacy response did not contain the revisions mentioned in the letter. Please provide a copy of the revised Toll Milling Agreement with the updated characterization language.

10. The Applicant removed the Warranted Condition section from the revised Toll Mill Agreement. Please confirm the Applicant intended to remove the section from the agreement.
11. Item #10 of the revised Toll Milling Agreement refers to "Feedstock Quality Standards". Please provide a copy of the Feedstock Quality Standards for Division review.
12. The Applicant states in the adequacy response letter the Byproduct Purchase Agreement provides opportunity for the material owner to sell the byproduct to SGLLC if the byproduct material meets quality standards and a BUD is obtained. As stated in Item #1, following consultation with CDPHE the Division will require the Applicant/Operator to obtain the BUD from CDPHE. Please revise the Byproduct Purchase Agreement accordingly.

Please be advised the Gladstone Toll Mill application may be deemed inadequate, and the application may be denied on September 15, 2021, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division. If more time is needed to complete the reply, the Division can grant an extension to the decision date. This will be done upon receipt of a written waiver of the Applicant's right to a decision by September 15, 2021 and a request for additional time. This must be received no later than the deadline date.

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; Division of Reclamation, Mining & Safety
Jeff Carter; Salisbury Gladstone LLC