



COLORADO

Division of Reclamation, Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

September 2, 2021

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

RE: Revenue Mine, Permit No. M-2012-032, Technical Revision (TR-16), Adequacy Review-2

Dear Mr. Briggs:

The Division of Reclamation, Mining and Safety (Division) is in the process of reviewing the above referenced Technical Revision in order to ensure that it adequately satisfies the requirements of the Colorado Mined Land Reclamation Act (Act) and the associated Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations (Rules). Based on the proposed changes included in TR-16 a Reclamation Cost Estimate update will be performed.

During review of the material submitted, the Division determined that the following issue(s) of concern need to be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

Equipment Storage Sheds

1. Your response of removing the concrete footers for the Equipment Storage Sheds to a depth of 1 foot below grade is noted, however Division policy is that all concrete will be buried a minimum of 3 feet below final grade and that no structural elements (rebar) may be protruding. The Division will bond as such. Please commit to removing concrete footers in accordance with this policy.

Equipment Wash Area

2. The drawing submitted of the vehicle wash pad is overly simplistic, please provide a more detailed drawing of the Equipment Wash Area. The drawings should include but are not limited to details regarding curbing around the perimeter of the pad, location of the sump and its relationship to and location of the Oil Water Separator.



3. The drawings submitted depict that the equipment wash area does not have walls. It is likely that contaminated (hydrocarbon) water would not end up on the wash pad and instead the area around the pad would become contaminated over time. Please describe and include in the updated drawings if necessary, to address how splash-back water resulting from washing of vehicles will be contained.
4. Does OSMI intend to use the vehicle wash pad year round? Given the tough winter conditions an open air wash bay seems impractical, as does the oil and water separators ability to function in sub freezing temperatures. Please clarify.
5. During the Division's inspection on August 31, 2021 it was stated that the wash pad would connect to the rails within the train shed so that trains and their cars could be washed prior to conducting maintenance. Please include the linear feet of the rail line to be extended to the wash bay.
6. What is the specific model/type of Water Oil Separator proposed to be utilized on site? The information provided is generic and includes lots of information for the various types of separators manufactured by AFL. Also please provide more detailed information regarding the applicability of the unit and it's efficiency to remove specific contaminants.
7. Effluent quality seems to be largely based on how efficiently the separator is functioning. Please provide maintenance procedures to ensure the unit will maintain it's efficiency. Also please describe if and how the water produced by the separator will be sampled prior to discharge, if it is to be sampled please provide a list of analytes the samples will be analyzed for.

Please submit your responses to the above listed issues by Monday September 13, 2021 in order to allow the Division sufficient time for review. If you cannot address the above issues by September 13, 2021 please request an extension to the decision due date to ensure adequate time for the Division to review materials. A decision due date of **September 15, 2021** has been set. If any adequacy issues remain by the decision due date the Division may deny your request.

The Division will continue to review your Technical Revision and will contact you if additional information is needed. If you require additional information, or have questions or concerns, please feel free to contact me.

Sincerely,



Lucas West
Environmental Protection Specialist
Division of Reclamation, Mining and Safety

Ec: Travis Marshall, Senior EPS, DRMS
Amy Yeldell, DRMS
Todd Jesse, OSMI
Michelle Robbins, OSMI