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First name: Jim V.
Last name: Rouse
Organization:
Title:
Comments: It is my pleasure to submit the following document, which consists of my review of and support for the proposed Midas Gold Stibnite mine / mill complex and the restoration of environmental conditions which resulted from past decades of mining and milling activities in the Stibnite mining district, including the US government supported tungsten and antimony mining efforts required to aid the WW II efforts. Please permit me to introduce myself, to provide understanding of my background to support the proposed effort. I hold a Professional Engineer degree in Geological Engineering from the Colorado School of Mines (1961) and a Master of Science degree in Hydrology from Stanford University (1968). Since my

graduation from Mines, and excluding a year at Stanford, I have been involved in the pollution control activities of industry, mostly from mining, timber preservation, and metal finishing. From 1961 through 1977, I was with the various Federal pollution-control agencies, the last 7 years of which I was the "Mining and Milling Waste Specialist" at the US EPA National Enforcement Investigation Center. During that time I supervised water-quality studies at several mining sites later added to the 'Superfund' list, including Bunker Hill, ID, Butte MT, Whitewood Creek, SD and the Grants Mineral Belt, NM.

Since 1977, I have provided consulting services to the mining industry in the US, Canada, and Australasia, both through my own firms and through other firms, with specialty knowledge on the subsurface behavior of heavy metals and radionuclides, and the remediation of these elements in the vadose and saturated zones. Currently I am the Principal Geohydrologist at Acuity Environmental Solutions. We are currently part of a team addressing acid mine impacts in the Danial Boone National Forest in KY. My resume is available through www.acuityes.com. This information is provided as background for my thoughts on the Stibnite Plan of Restoration and Operation, as well as the Draft Impact Statement for Midas Gold activities.

I am excited about the innovative plans to conduct restoration efforts on past environmental degradation, using operating funds, personnel and equipment during the life of the proposed mining efforts. The Stibnite site is not alone throughout the western US (and Canada), in the form of environmental degradation at numerous locations in the various districts. The most positive aspect of the Stibnite site is that Midas Gold has obtained control of the key areas. As such it can serve almost as a model for the EPA "Good Samarian" concept. The initiation and success of the Midas Gold efforts can do much to advance the concept at other districts. The "Core Values" discussion in Chapter ES-4 can serve as a model for other firms or groups of firms wanting to restore environmental conditions during the future activities at other districts. The removal and reprocessing of the past tails provides an opportunity to stabilize the existing material, at the same time recovering values. The later "neutralized' tails will be placed in a tailings facility constructed in the downstream construction mode, which offers a chance to have a more stable facility, and to comply with the recently issued tailings protocol.

Data in the draft impact statement indicates that there is little acid generation, and that the ground water generally is not heavily impacted by soluble heavy metals. Obviously deeper mining, below the redox horizon into more sulfide-rich ore will require measures to assure that this does not become a problem, but the available data does not seem to cause concern over this. The industry has come a long way in its understanding of this aspect of mining operations. Once the existing tails are removed, if there are areas of localized mobile metals, this can be treated through the bore-hole placing of restoration reagents to achieve geochemical fixation.

Having provided a brief consulting service to a previous operator at the Stibnite site in the late 1970s or early 1980s, I am delighted to see the planned modification to access of the site. The existing roads are such as to invite accidents and discharge of reagents into area streams.

In summary, the proposed Midas Gold operation provides a unique opportunity to restore environmental conditions degraded by multiple activities. I urge the Forest Service and the EPA to aid in the conduct of a poster-child "Good Samaritan" project. Please feel free to contact me if I can be of any service in bringing this to pass.