

Data Submitted (UTC 11): 7/17/2022 8:15:45 PM

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Comments: While I have been a member of the East Boulder Oversight Committee of the Stillwater Good Neighbor Agreement (GNA) for the last 22 years, these comment are on my own behalf.

The EIS thirty years ago did not foresee the nitrogen loading from the blasted waste rock used in the tailings impoundment determined as the source of nitrate contamination today. With the proposed DFWRSA in close proximity to the East Boulder River and directly across the river from the EBM, the concern about contamination of the shallow groundwater at the site may be addressed by full analysis to remove as much nitrogen as possible through washing of waste rock, and other methods, prior to placement.

If washing is feasible, then efforts should be made to reduce the amount of waste rock storage needed to a minimum by sizing and separating waste rock which could allow for mixing with the "slimes of the sand size particles presently separated out and used by SMC as backfill, and making it very difficult to remove the water in the TSF. This potential solution could facilitate dry stack or filtered tailings and reduce the risk of TSF failure. It could also result in a smaller WRSA footprint, meet the need for a stable landform for closure of the TSF, protect baseline water quality by reducing the infiltration area and reduce costs of long term maintenance.

All of these possibilities should be examined to reduce the footprint recognizing the limited usable space in the upper East Boulder area.

With 20+ years of experience since the 1992 EIS, improvements can be made in this design to reduce impacts, protect baseline water quality and close a safer facility.

Thank you for your consideration.

Paul Hawks