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Comments: I am a physician who specializes in treatment of chronic illness from toxin exposures including exposures to heavy metals. The most recent amendment to the Stibnite Mine DEIS does not address any of my previous or ongoing concerns that revolve around air and water quality.

1: pg 2-244 quote:

"Approximately two percent of the groundwater particles originating from the Yellow Pine pit backfill are predicted to reach those groundwater areas which could observe an associated increase in groundwater antimony and arsenic concentrations."

"In groundwater samples from alluvial and bedrock wells, analytes concentrations generally met regulatory criteria except for arsenic and antimony. Arsenic and antimony are considered the key chemicals of public health concern in groundwater in the analysis area. Highest groundwater concentrations were noted in wells directly downgradient of the legacy disturbed areas"

How will groundwater be monitored during the mining process and what criteria will be used to determine an "acceptable" increase in groundwater antimony and arsenic? To me, no increase in groundwater heavy metals is acceptable. There are many unknowns about the complexity of groundwater migration. The ATSDR Public Health Study that is quoted is 20 years old and we now know that no increase in heavy metals is safe.

2: pg 4-252 quote:

"Air emissions from the project have the potential to contribute metals to the ground surface via wet and dry deposition that have the potential to affect surface water chemistry. Most of these contributions would be in the form of particulate matter, but a portion of the local aerial deposition of mercury may also occur in elemental form. Total mercury emissions from the project are predicted to be approximately 13.6 pounds of mercury per year. "

The report concludes without evidence that "aerial deposition would have a minor to moderate, long-term effect on particulate mercury loads in streams within the project area watershed, depending on the annual precipitation conditions. " There is no plan to monitor air or water quality during the project for mercury deposition.

The entire town of McCall, Idaho depends on the water quality of Payette lake for drinking water. The risk of long term, significant contamination of this body of water alone is significant and there is no plan to monitor it. This does not include the risks to rivers, streams, fish and other wildlife that others have commented on.

3: The significant risk of hazardous materials spills from prolonged and frequent transport increases proportionately with the number of transport vehicles involved. The impact of even 1 spill in a rural area with limited resources and nearby waterways would be of great concern and be a very significant risk for contamination of air and water. Hazardous materials spills are the responsibility of local Fire Departments. The DEIS does not indicate that there would be any Technician Level (NFPA 472) Hazardous Material Responders available to respond quickly and with the most expertise/equipment to a spill. This needs to be addressed. The economic and other risks of road closures involved in such a situation have not been addressed either.

Sincerely,

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