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## EPA should run Gladstone plant at capacity

*Editor's note: Sunnyside Gold Corp. reclamation director Kevin Roach sent the following letter to the Bonita Peak Mining District Superfund Site Community Advisory Group on Nov. 5:*

Dear Citizens Advisory Group:  
It has been five years since the Animas River Stakeholders Group developed the ARSG Timeline for Reducing Metals Loading in the Upper Animas River Basin.

The Timeline called for the implementation of the "Preferred Solution" to further improve Animas River Water Quality by June of 2017. Unfortunately, the EPA Gold King Blowout and EPA's course of conduct since the Blowout have derailed the proven collaborative approach in the Basin. Significant time and money have been needlessly wasted while the obvious solution to further improving water quality has been ignored.

In order to further improve water quality in the Upper

Animas River Basin, EPA should immediately commence operating the Gladstone water treatment plant at capacity.

Running the plant at capacity would more than achieve the Citizens Superfund Workgroup's lead priority of improving water quality to levels documented in 1999-2003. Experts believe that running the Gladstone plant at capacity would cause Cement Creek water quality to be better than it was prior to any mining in the area.

Running the Gladstone plant at capacity, together with the documented improvements to water quality already achieved by both SGC and the ARSG, would result in greatly improved Animas River water quality and constitute an intelligent and efficient basin-wide solution.

The optimal site for storage of precipitate from the Gladstone plant is Mayflower Impoundment No. 4, which an expert engineer has called "an ideal long-term

sludge depository."

See Letter from Kevin Roach, SGC, to Gregory Sopkin, Regional Administrator, Re: Scoping Level Study Drawings for Mayflower No 4 Storage Facility (September 10, 2019), a copy of which has previously been provided to the CAG.

Gladstone is the only suitable location for a water treatment plant in the Basin. The major remaining point sources of metals loading in the Basin are proximate to Gladstone. See Mark Logsdon, Geochemica, Mass Loading Analysis of the Upper Animas River at Water Quality Station A72: Contribution of Sub-basin Drainages to Total Loading (and Concentrations), Technical Memorandum (July 14, 2012); Updated Annual Average Flow and Load Data 2011 - 2015. Capturing and treating these flows, together with partial flows from Cement Creek, is the "best case alternative."

See MWH, Evaluation of Certain Selected Conventional

Treatment Methodologies Cement Creek (July 2012). As noted in these authoritative reports, capturing additional flows anywhere downstream from Gladstone would be incredibly costly and extremely inefficient because the increase in flows greatly outweighs the increase in metals loading.

As succinctly stated in the 2018 Paper There Is More Than Sufficient Knowledge to Tackle Bonita Peak Today and Improve Water Quality in the Animas River:

It is clear that sufficient knowledge exists to make the decisions necessary to successfully address the major remaining sources of metals loading to the Animas River. The Bonita Peak area has been studied extensively. Every aspect of the problem of metals loading, and the solution to such metals loading, has been analyzed comprehensively. Years of concerted effort has resulted in

many sources of metals loading having already been reduced or eliminated. The remaining significant source of metals loading to the Animas River is point sources in the Cement Creek drainage. These flows should be targeted for treatment. Treating these flows would substantially reduce metals loading to the Animas River and demonstrably benefit the trout fishery downstream from Silverton. The best way to address these flows is through the proven technology already being employed at the Gladstone water treatment plant. The existing Gladstone treatment plant should be run to its full capacity.

The Reports referenced in this letter can be found at <http://www.sgcreclamation.com/reports.html>.

Thank you for your attention to this matter.

Sincerely,  
Kevin Roach, director, Reclamation Operations, Sunnyside Gold Corp.