

CAG Meeting Summary
Bonita Peak Mining District Community Advisory Group
February 22, 2024, 6:30—8:35 PM
via Computer Conferencing and In Person
at Silverton Town Hall, 1360 Greene Street

CAG in attendance: Chara Ragland (Chair), Sara Burch, Anthony Edwards, Ty Churchwell, Parker Newby, Russ Anderson, Terry Morris, David Palmer, Emily Thorn, Susan Livenick, Jason Fast, Charlie Smith; Helen Mary Johnson and Brian Devine online.

In room: Meg Broughton, Joy Jenkins, Athena Jones, & Jessica Duggan (EPA); Kirstin Brown (CODRMS), Mark Rudolph (CDPHE), Lisa Merrill (BLM), Allen McCaw (USFS), Jake Kurzweil (MSI), James Livenick

Introductions and Announcements

Chara announced the new officers elected for 2024 and introduced them:

Chara Ragland – Chair
Russ Anderson – Vice Chair
Ty Churchwell – Secretary/Treasurer
Terry Morris – Working Group Coordinator

Chara announced the establishment of a working group for Sampling and Data

Management: Sara Burch - Sampling Coordinator
Dave Palmer - Data Manager
Parker Newby
Charlie Smith

Chara noted that both the EPA and La Plata County Commissioner had a favorable response to Peter Butler’s letter of resignation and wished to thank Peter for his effort. As the new chair, Chara emphasized that her strength is not in mining but in coordinating action to promote progress. She would like to see the community, agencies, and tribes within the Animas River watershed build something strong for the community in the long run. Chara sees the CAG as an advisory group that obtains and contributes meaningful input to improving the watershed, including:

- Sampling
- Goal setting particularly SMART goals that are specific, relevant, meaningful, and timely
- Long term monitoring plan
- New working groups, such as for Howardsville and Gladstone with input from all in the meeting and online.

Kirsten Brown announced that the Rocky Mountain Mining and Reclamation Conference registration has been extended to March 1. The conference will be held in Leadville on May 22-24. Check it out on the MSI website.

Ty announced that the CAG has a new website manager/administrator.

He also reported that advertisements were sent to the local paper and via email announcing a CAG opening. The preference is to find someone with agricultural experience to fill the need for such expertise in the group.

Brian (online) announced the new La Plata County Public Health Department started January 1st. The county will need to appoint a new representative for the CAG.

Business Items

The bulk of the meeting was devoted to a discussion of the EPA's Draft OU2 Conceptual Site Model (CSM). EPA provided a draft CSM to CAG members for comment and suggestions. Meg asked if EPA should take the comments for review and get responses back to the CAG. Chara and the CAG preferred a real time response and discussion to the comments. Meg noted that a contractor representative from CDM Smith (Kurt Coover) who helped prepare the draft CSM was online to respond to comments. Helen Mary asked what would work best for EPA. Meg stated that this was a collaborative discussion, and EPA also would have their own comments and edits; this process is new and experimental to EPA, and she agreed we should continue the meeting with a real time discussion. Meg noted that the discussion was being recorded and asked if that was okay with the CAG. CAG members agreed that it was fine. (Note: recording did not work.)

Jessica commented on the purpose of the CSM. It describes what we know and what we don't. It is an internal document that helps identify data gaps and how to fill in those gaps. It will be updated using the document's revision recorder and will become part of the record. The CSM will not be reissued but can be provided as a PDF file. Chara will be sent the link when completed. Joy noted that EPA will collect more samples this year and incorporate new data to update the CSM.

Anthony asked if the OU2 is separate from the TP-4 repository, i.e., what if there is a cap installed. Joy said it could be added in the next revision to the CSM.

CAG comment: add an executive summary at the beginning of the CSM. Emily described what an executive summary entails for those who did not know. Susan noted the CSM is a working document and EPA is seeking comments from the CAG and our institutional knowledge. Meg said that a fact sheet would be preferable to an executive summary because the document will get revised periodically. Joy and Meg agreed that they can probably use Section 1 for the public audience.

CAG comment: Figure 2.3 – how certain that there is glacial drift and alluvium under the pond? Coover responded by calling out Figure 32. The interpretation (by Sunnyside) is

glacial drift is on the side and alluvium on the base and possibly on top of the drift. The compositional differences are slight, although the alluvium has a higher transmissivity. Red seep is high in iron but not other metals, and it's uncertain what is natural and what is mining related. The southwest corner of TP-4 appears to bottom in standing water. Terry mentioned that the red fen (bog) in the vicinity of Seep 6150 was identified long ago by a backhoe operator. He thinks advanced alteration beneath TP-4 may be the source. Cooper called up Figure 29 and said it shows in 1975 that the braided channels of the meandering river crossed edge to edge in the valley. The river alluvium was used to build the underdrain, and Sunnyside also used peat from the stream bed as topsoil for site remediation.

CAG comment: Section 2.2 – put dates on the bulleted items. Figure 4 – the top of the risk assessment chart is cut off. Why is there a blue line on the chart? Coover stated that it is part of the matrix that applies to OU2, and the table was prepared by the site risk assessor; would have to consult with the assessor. Helen Mary noted it is a risk assessment issue; the chart is available on EPA's website.

CAG comment: Section 4 – general comment is that it is poorly written, needs editing. Why were the other mills included in the discussion since they appear to have been cleaned up in the past? Lisa commented that there is an aerial diagram showing the old mill locations.

CAG comment: Figure 21 – show where the old road and new road are located. Chara suggested using Figure 92.

CAG comment: Figures 24 – 27 suggest adding cross section lines to maps; why are some well data (groundwater elevations) not used in the maps? Coover commented that the figures are from Sunnyside reports, and he had no reason to recreate them. He said that he could modify them to respond to comments.

CAG comment: Seep 6150 – what is the source? Coover confirmed that is a data gap since the floodplain was not investigated at all. It will be a primary part of the investigation. Emily asked where the groundwater contamination came from. Coover noted there is one continuous plume at Seep 6150 to the end of OU2. No specific source has been identified in the wetlands; the upgradient area is not connected.

CAG comment: Section 8.1 – add a link to the Riverwatch data. Section 8.2 – Figure 37 needs a better description.

CAG comment: Section 9.2 – add hardness to the listed suite of analytes. Coover said that makes good sense – the ICP suite is a subset of what was analyzed. Section 9.3 – show where is Seep 6150? Suggest adding an offset arrow showing its location in comparison to the other sampling points. Coover stated that is a general location of contaminants, and just shows hotspots.

CAG comment: Table 2 – prefer more graphical representations of the cluster locations versus tables. Coover said it could have its own appendix in a CSM presentation versus in a remedial document. He ran many iterations of cluster groupings and got various clusters – from 4 to 16 - and settled on 12. It is not perfect but is reasonable based on professional judgement.

CAG comment: Figure 40 – the range of scales for the data is misleading. Anthony noted the scale could be better. Coover stated that the value 21 to 1430 is an “everything else value” with only a couple of data points within it. Terry noted there were only a couple of values greater than 200, so don’t need so many colors. Terry commented that the flood of 1975 out of Boulder Creek corresponds to the “clean” part of the diagram; the tailings were swept away by the flood. Some areas within the wetlands and willows the tailings were not cleaned up. Coover mentioned that between TP-2 and TP-4 they found some tailings in the floodplain. No tailings were found west of TP-4. Anthony asked about any alteration evident in the area between TP-1 and TP-4; there should be pH differences at any hotspots. Helen Mary asked why to differentiate between low impacted and unimpacted areas. Coover stated that areas greater than 10 were clearly impacted and he liked to show areas of lesser impact. If they remediate the red areas first, then they next must deal with the yellow areas.

CAG comment: Section 13.11, Figure 92 – were any drainage ditches found? Coover commented that when doing the investigation, they used samples taken in the 1984 time frame. Red and orange dots are 2020 data. The pathways shown by purple arrows are still relevant, but there is still lots of speculation in the diagram. There are data gaps to be investigated, but we still don’t know what happened. Athena noted that during the investigation they did not find groundwater but were in tailings during the excavation of the trench area, with the same vertical distances throughout. Jessica mentioned that there was no clear documentation of the trench location, so it was our best guess.

CAG comment: Section 15 – needs a link from TOC to text. Coover stated that their new document template does not link the TOC to text; trying to figure out how to change that. Athena noted that data from the 2023 field season on the edge of TP-4 is not included in the CSM.

Charlie observed that the section on human health specifically called out tribal members, and he wondered why? It might be construed as biased. Athena commented that tribes have differing interactions with flora and fauna that may need to be considered in the CSM.

This concluded the discussion and comments on the draft CSM. Coover then showed and discussed four recent slides that are not included in the CSM. These meeting notes do not include information presented in those slides.

Administrative Items

- ✓ Meeting Summaries – Chara presented the January 2024 meeting notes summary for approval. Parker motioned to approve the summary. Sara seconded. All were in favor.
- ✓ Long-Range Schedule – next CAG Meeting is scheduled for March 21 in Durango.
- ✓ Next open meeting will be scheduled for April 18 - location TBD,
- ✓ Future Agenda Items? *Macroinvertebrate Data, Remedial Actions for Gladstone and Howardsville, etc.*

8:35 PM**Adjourn**