

COMMENTS: CONSTRUCTION EMERGENCY ACTION PLAN FOR THE STANDARD MINE SUPERFUND SITE

General Comment – Many emergency response actions contained in the Emergency Action Plan (EAP) are to be undertaken by local officials. These organizations should acknowledge their understanding and acceptance of their obligations by being signatories to the Plan.

Section I: Abnormal Reading, Observation or Low Consequence Unanticipated Release Notification Flowchart

Comment: In the interest of accurate information dissemination, the Crested Butte Water Department should be made aware of abnormal readings or observations as part of the notification process, acknowledging their receipt of the notice and confirming their understanding that they are not required to take any further action.

Section II: Statement of Purpose

Purpose. "...MIW discharges from many of the Standard Mine adits, at varying flows, with the primary discharge occurring from Level 1."

Comment: For clarity, we understand, and the plan should state that the MIW discharges only from Levels 1, 2 (seep), and 5.

Section III: Project Description

Comment: We note that a potential breach of the existing portal blockage in Level 2 was evaluated as a low risk resulting in low consequences were mitigation to occur, but resulting in high consequences should mitigation not occur. Although we agree with these conclusions, we are anxious that mitigation occur in order that the risks and potential consequences at the collapsed Level 2 entry are in fact low. The Failure Modes and Effects Analysis Draft Workshop Notes suggest that dewatering of Level 2 is necessary to achieve the low risk, low consequence threshold. Further, it is logical that construction safety will be enhanced, and environmental conditions potentially improved, by removing the Level 2 mine pool prior to initiating significant subsurface work in Level 1. To this end, we recommend that EPA dewater Level 2 early in the 2016 field season, and take steps at the Level 2 adit collapse to prevent near surface containment of water in the long term.

Incident Detection. "Construction activities will be occurring up to 24 hours per day during the summer construction season, generally from July through October."

Comment: Please describe the process by which visual monitoring of mine water discharges will occur between sunset and sunrise.

Section IV: EAP Response Process

Comment: Pertaining to High and Medium Consequences of an imminent release or in the event that a release has occurred, relevant criteria appear to be based on quantity or coloration of the release. We encourage EPA to develop and implement a water quality (chemistry based) standard which could also be applied to the criteria in order that all aspects of an event are objectively known, evaluated and accounted for. These water quality derived criteria could be used to supplement and define Medium Consequence Item 3) “potential impact to water supply...”

Section V: General Roles and Responsibilities Under the EAP

Comment: This section notes that “The Town of Crested Butte and Gunnison County Emergency Management are responsible for providing overall coordination and resource management of town and county response activities, including coordination of local municipality, emergency fire, and police responsibilities.” We are interested in assuring that all responsible parties understand their roles in the event of an emergency response resulting from the Standard Mine. To that end, we recommend providing the opportunity for these agencies to be signatories to the EAP. This signatory role may help in communicating individual roles and responsibilities to all engaged in the various responses.

Section VI: Preparedness

C. Response During Periods of Darkness

Comment: Operations are anticipated to be conducted on a 24 hour per day basis, which means that incidents could potentially occur at any time of day. The plan states that during periods of darkness, auxiliary illumination will be provided through use of portable lighting equipment provided by HDR or local emergency services resources. This statement implies that portable lighting equipment would be transported to the site as needed. Due to the need to react quickly and appropriately, even during night time hours, we suggest that one or more light plants be pre-located at the site for the duration of the construction season and available for use whenever operations are conducted between sunset and sunrise.

E. Response During Periods of Adverse Weather

Comment: As noted in Section VI B. of the EAP, alternative modes of transportation are required to access the site at certain times of year or during severe weather events. Alternative transportation includes, but may not be limited to helicopter, snow machines and foot travel. These alternative methods of accessing the site could be referenced in this section, and an estimate of response time could be provided for a given mode of transportation.

G. Emergency Supplies and Resources

Comment: The EAP states that “HWCC has available those excavating and lifting equipment that are on-site for construction.” Available equipment would be used to implement repairs should such repairs be practical and not endanger human life. Please provide a list of equipment to be located at the site during the construction season which could be utilized to facilitate a structural repair. We suggest that, at a minimum, a light duty track excavator and / or small dozer be available on site through the construction season in order to facilitate emergency repairs or to construct temporary earthen structures in an expedient manner if necessary.

H. Field Operations Center

Comment: The EAP states that the “...HDR on-site project office will serve as the Field Emergency Operations Center...” We suggest that an alternate location also be pre-designated so lines of communication and contact are maintained in the event that the project office cannot be used as the Emergency Operations Center.

J. Training and Exercising

Comment: We suggest that the annual refresher training referenced in Section J be conducted no less frequently than twice per year; once at the beginning of the field construction season, and once about half way through the field construction season.

Comment: We suggest that revisions to the EAP be distributed to all responsible personnel immediately upon release, versus the suggested monthly updates (please see Appendix A for immediate update commitment).

Comment: We suggest that the Tabletop exercise be conducted no less frequently than twice per year; once at the beginning of the field construction season, and once about half way through the field construction season. Perhaps it could be scheduled at the same time as the refresher training.