



COLORADO

Hazardous Materials
& Waste Management Division

Department of Public Health & Environment

May 20, 2021

Laura Williams, Response Unit Chief
U.S. Environmental Protection Agency
1595 Wynkoop Street
Denver, Colorado 80202-1129

Via e-mail to: Williams.Laura@epa.gov

RE: Request for Time Critical Removal Action - Pride of the West Mill, Silverton, San Juan County Colorado

Dear Ms. Williams:

The Pride of the West Mill, located on County Road 2, approximately 1.5 miles northeast of Silverton Colorado, is a former mineral processing facility that had operated under permit #M-1984-049 from the Colorado Division of Reclamation and Mining Safety (DRMS). Operations at the facility ceased in 2016, and the facility has forfeited its reclamation bond of approximately \$280,000. On May 11, 2021, DRMS staff, along with a representative of the San Juan County Sheriff's office, conducted an inspection of the facility to identify potential safety concerns and reclamation activities that could be addressed using bond forfeiture funds.

The inspection included exterior visual observations of the nine buildings located on the property, and also included interior inspections of two of the buildings. With assistance from the Sheriff, DRMS staff were able to access the interior of the mill building and the leach plant. Inspection of the mill building interior noted the general disrepair of the building and also identified numerous barrels that appear to contain cyanide chemicals, flocculants, peroxides and various oils and lubricants. Many of the barrels are marked as corrosive and some appear to be leaking. Numerous bagged chemicals were also present within the mill building. Inside the leach plant, DRMS staff identified additional barrels of cyanide chemicals and other bagged chemicals.

DRMS staff were also able to observe the interior of the lab building through building windows where a number of chemicals in reagent type containers were observed. One of the lab building windows is broken and accessible to the public. Additional details of the inspection and a list of the chemicals observed can be found in the attached notes from the DRMS inspection. Site photographs taken during the inspection can be found at <https://drive.google.com/drive/folders/1-1rJtGPZbkkf3seP7qLuhYow7J5U7IQ?usp=sharing>

The inspection notes and photographs document the presence of significant volumes of toxic and



corrosive chemicals within the mill and the leach plant building. Some of the chemical barrels appear to be leaking and most lack secondary containment. Additionally, several inches of ice were observed in the lower level of the mill building, suggesting that groundwater or surface water is infiltrating the structure. As such, any release of stored chemicals could impact the alluvial aquifer and the nearby Upper Animas River. Potential asbestos-containing material were also observed within the buildings. Furthermore, the site is adjacent to County Road 2 that sees heavy recreational traffic during the summer months.

The presence of toxic and corrosive chemicals in the unoccupied and unmaintained buildings, potential impacts to groundwater and/or surface water, along the potential for trespassers to access the site present imminent and substantial risks to human health and the environment. During a meeting on May 17, 2021, DRMS informed both EPA and CDPHE that available bond funds were insufficient to address the safety hazards at the site and perform any necessary reclamation. Therefore, due to the observed releases of hazardous substances, and the potential for public access and exposure to the releases, CDPHE believes this site is an appropriate candidate for a CERCLA emergency removal action.

Because state and local resources are insufficient to address the immediate safety and environmental concerns at the site, CDPHE formally requests assistance from the Region VIII removal program. Should EPA decide to proceed with a response action at this site, Colorado looks forward to providing support as part of its on-going efforts to render care, assistance and advice in accordance with the National Contingency Plan and at the direction of EPA's on-scene coordinators and remedial project managers, as set forth in section 107(d) of CERCLA, 42 U.S.C. § 9607(d).

If you have any questions, please feel free to call me. Due to current COVID restrictions, I can most easily be reached on my cell phone at (303) 913-9375.

Sincerely,



Douglas C. Jamison
Superfund\Brownfields Unit Leader
Hazardous Materials and Waste Management Division

cc: Deirdre Rothery, EPA
Jeff Graves, DRMS
Jason King, COAGO
Jeff Fugate, COAGO

