

EPA REGION 10 Enforcement Division

INSPECTION REPORT

Inspection Entry Date/Time	09/11/2023 06:50 AM (AKT)	Announced: Yes	
Inspection Exit Date/Time	09/11/2023 04:38 PM (AKT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Coeur Alaska, Inc.		
Facility or Site Name	Coeur Alaska, Inc. - Kensington Gold Mine		
Facility/Site Identifier	AKR000203612		
Facility/Site Physical Address	Sec 5, T35s, R62e Approx 45 Mi		
City, State, Zip Code	Juneau, AK 99801		
County/Borough	Juneau City & Borough		
Generator Status	Large Quantity Generator (LQG)		
NAICS	21222		
Type of Operation	Gold Ore and Silver Ore Mining		
Geographic Coordinates	58.303379, -134.407654		
Mailing Address/Secondary Address	Mr. Peter Strow, Environmental Manager pstrow@coeur.com 3031 Clinton Drive, Suite 202 Juneau, AK 99801 CC: Ms. Cassandra Joos, Senior Environmental Coordinator cjoos@coeur.com Ms. Sierra Lammers, Environmental Coordinator slammers@coeur.com		
City, State, Zip Code	Juneau, AK 99801		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2023.11.28 08:10:28 -09'00'	
	EPA Region 10	Jones.Jon@epa.gov	(907) 271-6329
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.12.14 14:28:02 -08'00'	
	EPA Region 10	Quarterman.matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Coeur Alaska, Inc Kensington Gold Mine Facility (the

“Site” or “Facility”), located at Sec 5, T35s, R62e Approx 45 Mi, Juneau, AK 99801, at 06:50 AM (AKT) on 09/11/2023 for an announced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Ms. Cassandra Joos, Senior Environmental Coordinator that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA). This was a Resource Conservation and Recovery Act (RCRA) inspection. The facility was inspected to ensure compliance with standards for hazardous waste generators and universal waste management (40 C.F.R. Part 262 through 273) and used oil management (40 C.F.R. Part 279). The inspection was conducted as part of a Core Program requirement for FY 2023. This report is based on information supplied by Coeur Alaska, Inc. - Kensington Gold Mine Facility representatives, observations made by the EPA Region 10 inspector, and records and reports maintained by the facility, but not limited to: direct observations made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Senior Environmental Coordinator/Coeur Alaska, Inc. - Kensington Mine	Cassandra Joos	(907) 523-3606	cjoos@coeur.com	Yes	Yes
Environmental Coordinator/Coeur Alaska, Inc. - Kensington Mine	Sierra Lammers	(907) 523-3337	slammers@coeur.com	Yes	Yes
RCRA Inspector/ADEC	Alan Pefley	(907) 269-4567	alan.pefley@alaska.gov	Yes	Yes
RCRA Inspector/ADEC	Emily Vannortwick		emily.vannortwick@alaska.gov	Yes	Yes

Opening Conference

At the beginning of the opening conference, I presented Ms. Joos with a list of questions that was part of an information request for mines operating in Alaska. The list of questions presented to Ms. Joos and the facility responses to those questions are included in the attached document log. The file size of the majority of supporting documentation that was received from the facility was too large to be uploaded to the attached Document Log.

We asked Ms. Joos about any changes that had taken place since the last inspection. She told us that Kevin Eppers, the last Environmental Manager, had taken another position at one of Coeur's other mines. She told us that Peter Strow was hired to replace Mr. Eppers as the new Environmental Manager at the Kensington Mine. Ms. Joos told us that Mr. Strow would not be available for the inspection, as he was away on a two-week moose hunt.

Ms. Joos also told us that the Julian Mine was closed in May/June 2023 and that they have flooded the mine.

She also said that they had updated their Forrest Service Plan in February 2022. The mine is located on patented claims within the Tongass National Forest and portions of the support operations are located on U.S. Forest Service Lands.

During the opening conference, we explained that the focus of the RCRA inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents.

Only those areas in which we observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Facility/Site Information

The following information was obtained from the facility's website (<https://www.coeur.com/operations-projects/kensington-ak/default.aspx>) as well as the Alaska Department of Natural Resources website (<https://dnr.alaska.gov/mlw/mining/large-mines/kensington/>).

Coeur Alaska's Kensington mine is an underground gold operation located in southeast Alaska, consisting of the Kensington Main deposit, Raven deposit as well as other nearby deposits and exploration targets. The Kensington mine is housed in the historic Berners Bay Mining District which has seen over 130 years of resource development. The Kensington mine is located 45 miles north-northwest of Juneau and 35 miles south-southeast of Haines. The mine has a small footprint of approximately 240 acres and is accessed via the water on Lynn Canal or by air. The project is operated by Coeur Alaska, Inc. (Coeur), a wholly owned subsidiary of Coeur Mining. The major Kensington Mine facilities include the Kensington underground mine, underground paste backfill plant, surface mill, tailings treatment facility, administrative and camp facilities, generator facilities, water treatment facilities, and marine dock facility. Power is supplied by on-site diesel generators. Coeur Alaska employs approximately 400 mining professionals at the mine and is the second largest private employer and the second largest property taxpayer in the City and Borough of Juneau. The mine was originally permitted in 2005, and operates 24-hours a day, 365 days a year.

Coeur Alaska became involved in the Kensington mine property and formed a joint venture in 1987, and in 1995, Coeur Mining acquired 100% interest in the mine. Commercial production commenced in 2010 and in 2019, Kensington achieved over one million ounces of gold produced. In 2021, approximately 604,753 tons of ore was mined, and 673,625 tons were processed through the mill facility. Approximately 16,671 tons of concentrate were shipped to an off-site refinery producing approximately 123,550 ounces of gold. A total of 187,029 feet of core drilling was completed in 2021. The drilling was comprised of production and exploration programs.

Number of employees	~395
Length of Facility at Location	Production began in 2010
Operating Hours	The Mine operates 24 hours a day – 7 days a week with two 12-hour shifts. Mine employees typically work 2 weeks on and 1 week off, with approximately a third of the employees out at any given time.
Safety Training Provided to Inspector(s)?	Yes
Size of Facility	240 acres
What type of generator facility notified?	Large Quantity Generator (LQG)

What type of generator facility verified as?	Verified by Ms. Joos to be an LQG
Weather Conditions	Rainy

Process Description

According to Ms. Joos, wastes generated at the facility include waste aerosol cans, waste residue from aerosol can puncturing, waste aerosol puncture filters, waste lead contaminated debris (PPE, cupels, crucibles, slag, plastic bags, and clean-up cloths), waste sodium hydroxide cleaner, waste ammonium vacu-vial water quality test kits, used oil, used oil filters, and used antifreeze.

We were accompanied throughout the inspection by Ms. Lammers and Ms. Joos. During the inspection we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste and used oil management.

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Assay Lab		Yes
Area just outside the lab	Staging area for containers of used crucibles and gold bar slag.	Yes
Central Accumulation Area (CAA)	Accumulation of hazardous waste.	Yes
Green Connex adjacent to CAA accumulation locker	Additional CAA containment area.	Yes
Comet Mine Water Treatment Plant (MWTP)		Yes
Flammable storage cabinet		Yes
Concentrate Load Out		No
Mill Maintenance/Mill		No
Small bead-blast booth	Used to clean up parts removing rust/scale.	No
Sewage Treatment Plant Lab		No
Surface Maintenance Shop		Yes
Area outside and adjacent to the Surface maintenance Shop	Universal waste battery accumulation area.	Yes
Oil filter crusher	Crushing of used oil filters.	Yes
Parts Room	Equipment and parts storage.	Yes
Tailings Treatment Facility (TTF)		No
Filter Press	Filter Press sludge generated in the TTF.	No
Underground Maintenance 940 Paste Plant		Yes
Underground Maintenance at the 900 Main		Yes
Underground Maintenance Shop 850		No

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Universal Waste Connex	Storage Connex used to accumulate universal wastes.	No
Warehouse	Storage of mining equipment and supplies to be issued to mine personnel.	Yes
Satellite Accumulation Area (SAA), outside and adjacent to the warehouse	SAA for the accumulation of waste aerosol can residue in a container with an attached aerosol can popper.	Yes
Water Treatment Plant (WTP)		No

SECTION II – OBSERVATIONS**Building:** Tailings Treatment Facility (TTF)/Filter Press**Observation #:** JJ1-OB-001 **Date:** 09/11/2023 **Contains AOC:** No **Contains CBI:** No**Person Interviewed:** Cassandra Joos **Title:** Senior Environmental Coordinator

While in the Tailings Treatment Facility, we saw a filter press where sludge was generated from the treatment process and claimed by the facility to be managed under the Bevill exemption.

Photo(s)

1. [IMG_1640.jpg](#)
2. [IMG_1641.jpg](#)
3. [IMG_1642.jpg](#)

Building: Warehouse/Satellite Accumulation Area (SAA), outside and adjacent to the warehouse**Observation #:** JJ1-OB-002 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No**Person Interviewed:** Cassandra Joos **Title:** Senior Environmental Coordinator

During the inspection, we saw a SAA for the accumulation of waste aerosol residue. The SAA was located outside and adjacent to the Warehouse. At the time of the inspection, Ms. Joos explained that when a waste aerosol can was generated by mine personnel in the area, they would bring the aerosol can to the SAA and puncture the aerosol in the can popper that was attached to the SAA container. The punctured aerosol can is then placed into a lined container and when full the punctured aerosol cans are managed as scrap metal.

While inspecting this SAA, we observed quite a bit of overspray in the area from the aerosol can puncturing process. There was overspray on the surrounding walls of the SAA as well as paint that had run down the side of the 55-gallon SAA container and on the cover of the puncturing device. Later, while reviewing the photos, I noticed that at the time of the inspection the closure device on the attached aerosol can popper was not closed down onto the cover of the puncturing device so the SAA container was not closed during the inspection.

Ms. Joos response, that was received following the inspection, included a list of "Items noted during the inspection update" that included the following language:

EPA and ADEC Inspectors noted the following items during the inspection and close out meeting that are still in process of determination or correction.

- Overspray was noted in one of the aerosol can puncture units. We were unable to determine where the overspray was coming from but decided the best management practice would be to change the

puncturing device.

Photo(s)

1. [IMG_1643.jpg](#)
2. [IMG_1644.jpg](#)

Building: Warehouse**Observation #:** JJ1-OB-003**Date:** 09/11/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Cassandra Joos**Title:** Senior Environmental Coordinator

During the inspection, we asked Ms. Joos about the facility's use of leather products, such as gloves and mine belts. I explained that waste leather gloves will fail for chromium (D007) when tested. Ms. Joos indicated that she was unaware of this. I asked Ms. Joos if they issued these leather items to facility personnel, and she said these items were issued out of the Warehouse. When we got to the Warehouse, supply personnel took us to where they store these leather products. While there we saw a plastic sleeve on the bottom shelf that, according to the label, held 10 pair of leather gloves. We also saw some of the mining belts that are used to carry self-contained breathing devices. I explained that the belts may also have leather components. I explained that the facility would be required to make a waste determination for their facility's waste leather.

Ms. Joos response, that was received following the inspection, included a list of "Items noted during the inspection update" that included the following language:

EPA and ADEC Inspectors noted the following items during the inspection and close out meeting that are still in process of determination or correction.

- Leather items, goods may fail TCLP. Has a waste determination been completed on leather gloves or other PPE? Coeur Alaska has created a list of all leather goods and PPE that may be ordered. Waste determination of those items is in process.

This list of "Items noted during the inspection update" is included in the document log of this report.

Photo(s)

1. [IMG_1645.jpg](#)
2. [IMG_1646.jpg](#)
3. [IMG_1647.jpg](#)

Building: Surface Maintenance Shop/Area outside and adjacent to the Surface maintenance Shop**Observation #:** JJ1-OB-004**Date:** 09/11/2023**Contains AOC:** Yes**Contains CBI:** No**Person Interviewed:** Cassandra Joos**Title:** Senior Environmental Coordinator

While walking up to the Surface Maintenance Shop, we saw a blue, 55-gallon poly container that was being used to accumulated sealed, lead-acid battery jump packs. We asked Ms. Joos about the batteries, and she told us that they manage the batteries as universal waste. The container was labeled with the words "Jump Pack Collection Drum" and was marked with a DOT label for corrosivity. At the time of the inspection, the 55-gallon container held one sealed, lead-acid battery jump pack and was not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."

Ms. Joos response, that was received following the inspection, included photo documentation showing that the

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container had been marked with a "Used Batteries" label after the inspection.

Document(s)

1. Jump Pack Battery Drums Labels.pdf

Photo(s)

1. [IMG_1648.jpg](#)
2. [IMG_1649.jpg](#)

Building: Surface Maintenance Shop/Oil filter crusher

Observation #: JJ1-OB-005 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

While inspecting the Surface Maintenance Shop, we saw a used oil filter crusher. Upon closer inspection, we saw a five-gallon container beneath the filter crusher that was being used to accumulate used oil as filters were being crushed. We looked inside the container and saw that it contained used oil. At the time of the inspection, the container was approximately 1/4 full, containing a little more than a gallon of used oil, and was not labeled with the words "Used Oil."

Ms. Joos response, that was received following the inspection, included a list of "Items noted during the inspection update" that included the following language:

EPA and ADEC Inspectors noted the following items during the inspection and close out meeting that are still in process of determination or correction.

Containers determined to have held or the potential to hold used oil without used oil labeling or very faded labeling.

- Mobile maintenance personnel have been have reminded by supervisory personnel to label all used oil containers. The next online training module will contain reminder information concerning labeling of all used oil containers.

This list of "Items noted during the inspection update" is included in the document log of this report.

Photo(s)

1. [IMG_1650.jpg](#)
2. [IMG_1651.jpg](#)
3. [IMG_1652.jpg](#)
4. [IMG_1653.jpg](#)
5. [IMG_1654.jpg](#)

Building: Surface Maintenance Shop/Parts Room

Observation #: JJ1-OB-006 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

While inspecting the Surface maintenance Shop, we saw another waste lead-acid battery jump pack on the floor in the Parts Room. The battery had a tag attached to it that was marked with the word, "Junk." Ms. Joos verified that it was a waste battery jump pack that should be managed as universal waste. At the time of the inspection, the waste battery jump pack was not labeled with either the phrase "Universal Waste - Batteries,"

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"Waste Batteries," or "Used Batteries."

Ms. Joos response, that was received following the inspection, included photo documentation showing that the waste lead-acid battery jump pack had been placed inside the container outside that had since been labeled as "Used Batteries."

Document(s)

1. Jump Pack Battery Disposal.pdf

Photo(s)

1. [IMG_1655.jpg](#)
2. [IMG_1656.jpg](#)

Building: Assay Lab/Area just outside the lab

Observation #: JJ1-OB-007 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

While inspecting the Assay Lab, we saw two 55-gallon containers that were staged just right outside the door to the lab. According to facility/lab personnel, one 55-gallon container held used crucibles that had been onsite since November 2022. The other 55-gallon container held gold bar slag that had been onsite for two months. According to facility/lab personnel, they have been waiting to hear whether the contents of the containers will be managed as waste or if it will go through further extraction to get out any remaining gold, silver, or lead. I explained that a waste determination was required to be made at the point of generation. At the time of the inspection, the facility had not made a hazardous waste determination on either the used crucibles or the slag.

Ms. Joos response, that was received following the inspection, included a copy of an invoice showing that the used crucibles and gold bar slag had been sold.

Document(s)

1. Gold Slag Material Sale.pdf

Photo(s)

1. [IMG_1657.jpg](#)
2. [IMG_1658.jpg](#)
3. [IMG_1659.jpg](#)
4. [IMG_1660.jpg](#)

Building: Central Accumulation Area (CAA)

Observation #: JJ1-OB-008 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

During the inspection, we went across the road from the Assay Lab to inspect the facility's CAA. The facility uses a large metal HAZMAT storage locker for the accumulation of hazardous waste. Upon opening the doors of the CAA, we saw a five-gallon poly container containing hazardous waste that was not closed. The container held waste test kits for ultra-low chlorine. At the time of the inspection, the lid on the container was not snapped down all the way, making a complete seal with the container.

Ms. Joos snapped the lid down completely during the inspection, closing the container.

Photo(s)

1. [IMG_1662.jpg](#)
2. [IMG_1663.jpg](#)

Building: Central Accumulation Area (CAA)/Green Connex adjacent to CAA accumulation locker

Observation #: JJ1-OB-009 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

While still at the CAA, we saw a large green Connex box, adjacent to the large HAZMAT storage locker, that was also being used as a CAA. The Connex had signage posted on the door that stated, "Non-Hazardous Waste Storage Room." When we entered the Connex, we saw that there were two 55-gallon containers and one 35-gallon container of hazardous waste being accumulated inside. At the time of the inspection, we saw a 55-gallon container that was labeled as containing waste amines (D002). Additional labeling indicated that it contained a Part B hardener. Upon closer inspection, we saw that there was no accumulation start date (ASD) marked on the container.

Ms. Joos marked the container with an ASD of 9/2/23 during the inspection.

Photo(s)

1. [IMG_1666.jpg](#)
2. [IMG_1664.jpg](#)
3. [IMG_1668.jpg](#)
4. [IMG_1669.jpg](#)
5. [IMG_1665.jpg](#)
6. [IMG_1667.jpg](#)

Building: Mill Maintenance/Mill/Small bead-blast booth

Observation #: JJ1-OB-010 **Date:** 09/11/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

While in the Mill Maintenance area, we saw a small bead-blast booth. We asked Ms. Joos if waste was ever generated from this process and how it was managed. At the time of the inspection, Ms. Joos told us that she would need to find out and get back with us.

Ms. Joos response, that was received following the inspection, included a list of "Items noted during the inspection update" that included the following language:

EPA and ADEC Inspectors noted the following items during the inspection and close out meeting that are still in process of determination or correction.

Sand Blasting Units and Sandblasting materials. Has a waste determination been completed for sand blasting materials?

- There is just one sand blasting unit at Kensington Mine. The material used in the sand blast unit is nonhazardous by the SDS. A sample of used sand blast material is in process of being collected and analyzed. Another sample will be collected and analyzed when the material currently in the unit is ready

to be disposed as defined by the maintenance personnel using the sand blaster.

This list of "Items noted during the inspection update" is included in the document log of this report.

Building: Comet Mine Water Treatment Plant (MWTP)/Flammable storage cabinet

Observation #: JJ1-OB-011 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

While inspecting the Comet Mine WTP, we opened a flammable storage cabinet. Once opened, we saw an assortment of products being used at the WTP including aerosol cans. We checked some of the aerosol cans in the storage cabinet, by shaking them, to determine if any were empty/waste aerosol cans. While checking the various aerosol cans in the cabinet, we identified one waste aerosol that was still pressurized and contained some material. Ms. Joos confirmed that the aerosol can was a waste aerosol can. At the time of the inspection, the waste aerosol can was not labeled with the words "Hazardous Waste" or marked with a hazard indicator.

Ms. Joos took the waste aerosol can with her when we left the WTP, and she punctured the aerosol can in a waste aerosol SAA during the inspection.

Photo(s)

1. [IMG_1672.jpg](#)

Building: Underground Maintenance at the 900 Main

Observation #: JJ1-OB-012 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Cassandra Joos **Title:** Senior Environmental Coordinator

While inspecting the UG 900 Maintenance area, we saw two large used oil drain pads that contained used oil and were not labeled with the words "Used Oil." It could be seen that at one time the pads had been labeled, but the markings needed to be refreshed as the words were faded and/or obscured to the point that the words were illegible.

Ms. Joos response, that was received following the inspection, included a list of "Items noted during the inspection update" that included the following language:

EPA and ADEC Inspectors noted the following items during the inspection and close out meeting that are still in process of determination or correction.

Containers determined to have held or the potential to hold used oil without used oil labeling or very faded labeling.

- Mobile maintenance personnel have been have reminded by supervisory personnel to label all used oil containers. The next online training module will contain reminder information concerning labeling of all used oil containers.

This list of "Items noted during the inspection update" is included in the document log of this report.

While still in the UG Maintenance area, we saw a 55-gallon poly container that held a waste lead-acid battery jump pack. At the time of the inspection, the container was not labeled with either phrase "Universal Waste –

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Batteries," "Waste Batteries," or "Used Batteries."

Photo(s)

1. [IMG_1675.jpg](#)
2. [IMG_1674.jpg](#)
3. [IMG_1676.jpg](#)
4. [IMG_1673.jpg](#)

Building: Underground Maintenance 940 Paste Plant**Observation #:** JJ1-OB-013 **Date:** 09/11/2023 **Contains AOC:** Yes **Contains CBI:** No**Person Interviewed:** Cassandra Joos **Title:** Senior Environmental Coordinator

While inspecting the 940 Paste Plant, we saw a 55-gallon SAA container with an attached aerosol can popper. At the time of the inspection, the SAA container contained hazardous waste, but the cover on the attached aerosol can popper was not closed; therefore, the container was not closed.

Ms. Joos closed the cover on the attached aerosol can popper during the inspection.

Photo(s)

1. [IMG_1677.jpg](#)
2. [IMG_1678.jpg](#)

SECTION III – RECORDS REVIEW**Record:** Contingency Plan's Quick Reference Guide**AOC:** No**Ref #:** JJ1-RR-001**Reviewed By:** Jon Jones**Reviewed Date:** 09/11/2023

At the time of the inspection, Ms. Joos told us that the facility did not have a Contingency Plan Quick Reference Guide.

Ms. Joos response, that was received following the inspection, included a Contingency Plan Quick Reference Guide.

Record: Inspections**AOC:** Yes**Ref #:** JJ1-RR-002**Reviewed By:** Jon Jones**Reviewed Date:** 09/11/2023

During the inspection, we reviewed the last three years of the facility's weekly hazardous waste inspections, covering the period of September 11, 2020, through September 11, 2023. During this review, we found that no weekly hazardous waste inspection was conducted for the following two weeks:

- 3/13/22 through 3/19/22
- 4/9/23 through 4/15/23

Ms. Joos response, that was received following the inspection, included photo documentation of a note pad that she stated shows an inspection was completed on 3/16/22, during the week of 3/13/22 through 3/19/22.

Document(s)

1. Storage Room Inspections Dates.pdf

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Warehouse	Area: Satellite Accumulation Area (SAA), outside and adjacent to the warehouse	Sub-area:
JJ1-OB-002		
At the time of the inspection the closure device on the attached aerosol can popper was not closed down onto the cover of the puncturing device so the SAA container was not closed during the inspection.	Regulation:	Sections:
Building: Warehouse	Area:	Sub-area:
JJ1-OB-003		
During the inspection, we asked Ms. Joos about the facility's use of leather products, such as gloves and mine belts. I explained that waste leather gloves will fail for chromium (D007) when tested. Ms. Joos indicated that she was unaware of this. I asked Ms. Joos if they issued these leather items to facility personnel, and she said these items were issued out of the Warehouse. When we got to the Warehouse, supply personnel took us to where they store these leather products. While there we saw a plastic sleeve on the bottom shelf that, according to the label, held 10 pair of leather gloves. We also saw some of the mining belts that are used to carry self-contained breathing devices. I explained that the belts may also have leather components. I explained that the facility would be required to make a waste determination for their facility's waste leather.	Regulation:	Sections:
Building: Surface Maintenance Shop	Area: Oil filter crusher	Sub-area:

JJ1-OB-005		
At the time of the inspection, the container was approximately 1/4 full, containing a little more than a gallon of used oil, and was not labeled with the words "Used Oil."	Regulation:	Sections:
Building: Surface Maintenance Shop	Area: Parts Room	Sub-area:
JJ1-OB-006		
We saw a waste lead-acid battery jump pack on the floor in the Parts Room. The battery had a tag attached to it that was marked with the word, "Junk." Ms. Joos verified that it was a waste battery jump pack that should be managed as universal waste. At the time of the inspection, the waste battery jump pack was not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."	Regulation:	Sections:
Building: Surface Maintenance Shop	Area: Area outside and adjacent to the Surface maintenance Shop	Sub-area:
JJ1-OB-004		
At the time of the inspection, the 55-gallon container held one sealed, lead-acid battery jump pack and was not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."	Regulation:	Sections:
Building: Assay Lab	Area: Area just outside the lab	Sub-area:
JJ1-OB-007		
At the time of the inspection, the facility had not made a hazardous waste determination on either the used crucibles or the slag.	Regulation:	Sections:
Building: Central Accumulation Area (CAA)	Area:	Sub-area:
JJ1-OB-008		

Upon opening the doors of the CAA, we saw a five-gallon poly container that was not closed. The container held waste test kits for ultra-low chlorine. At the time of the inspection, the lid on the container was not snapped down all the way, making a complete seal with the container.	Regulation:	Sections:
Building: Central Accumulation Area (CAA)	Area: Green Connex adjacent to CAA accumulation locker	Sub-area:
JJ1-OB-009		
The Connex had signage posted on the door that stated, "Non-Hazardous Waste Storage Room." When we entered the Connex, we saw that there were two 55-gallon containers and one 35-gallon container of hazardous waste being accumulated inside. At the time of the inspection, we saw a 55-gallon container that was labeled as containing waste amines (D002). Additional labeling indicated that it contained a Part B hardener. Upon closer inspection, we saw that there was no accumulation start date (ASD) marked on the container.	Regulation:	Sections:
Building: Comet Mine Water Treatment Plant (MWTP)	Area: Flammable storage cabinet	Sub-area:
JJ1-OB-011		
While inspecting the Comet Mine WTP, we opened a flammable storage cabinet. Once opened, we saw an assortment of products being used at the WTP including aerosol cans. We checked some of the aerosol cans in the storage cabinet, by shaking them, to determine if any were empty/waste aerosol cans. While checking the various aerosol cans in the cabinet, we identified one waste aerosol. Ms. Joos confirmed that the aerosol can was a waste aerosol can. At the time of the inspection, the waste aerosol	Regulation:	Sections:

Inspection Date(s):

09/11/2023 - 09/11/2023

can was not labeled with the words "Hazardous Waste" or marked with a hazard indicator.		
Building: Underground Maintenance at the 900 Main	Area:	Sub-area:
JJ1-OB-012		
While inspecting the UG 900 Maintenance area, we saw two large used oil drain pads that contained used oil and were not labeled with the words "Used Oil." It could be seen that at one time the pads had been labeled, but the markings needed to be refreshed as the words were faded and/or obscured to the point that the words were illegible.	Regulation:	Sections:
Building: Underground Maintenance 940 Paste Plant	Area:	Sub-area:
JJ1-OB-013		
While inspecting the 940 Paste Plant, we saw a 55-gallon SAA container with an attached aerosol can popper. At the time of the inspection, the cover on the attached aerosol can popper was not closed; therefore, the container was not closed.	Regulation:	Sections:

Record: Inspections		
JJ1-RR-002		
No weekly hazardous waste inspection was conducted for the following two weeks: 3/13/22 through 3/19/22 4/9/23 through 4/15/23	Regulation:	Sections:

SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, I conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. I thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that I observed during my inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern resulted in determinations of violation.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



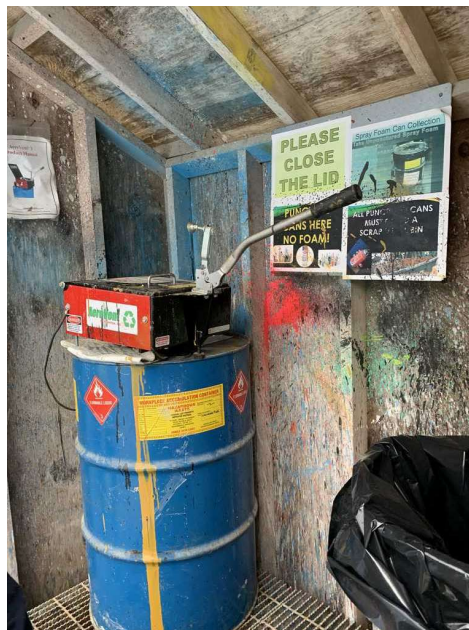
[Title]			IMG_1640.jpg
09/11/2023 09:01 AM	No CBI	No PII	Photographer: Jon Jones
Tailings Treatment Facility (TTF)/Filter Press			58.81415833, -135.03846666
Close-up view of the filter press.			



[Title]			IMG_1641.jpg
09/11/2023 09:01 AM	No CBI	No PII	Photographer: Jon Jones
Tailings Treatment Facility (TTF)/Filter Press			58.81414166, -135.03854444
View of sludge in trough beneath filter press.			



[Title]			IMG_1642.jpg
09/11/2023 09:04 AM	No CBI	No PII	Photographer: Jon Jones
Tailings Treatment Facility (TTF)/Filter Press			58.81406666, -135.03875833
View of the filter press in the TTF.			



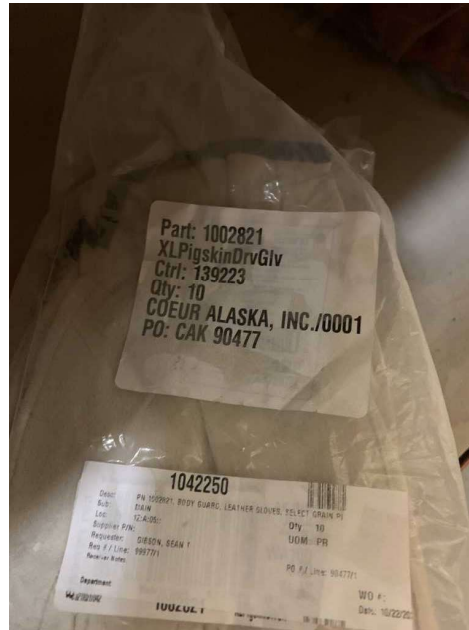
[Title]			IMG_1643.jpg
09/11/2023 09:30 AM	No CBI	No PII	Photographer: Jon Jones
Warehouse/Satellite Accumulation Area (SAA), outside and adjacent to the warehouse			58.83980555, -135.045975
View of SAA, showing 55-gallon container of waste aerosol residue with attached aerosol can popper is not closed.			



[Title]			IMG_1644.jpg
09/11/2023 09:31 AM	No CBI	No PII	Photographer: Jon Jones
Warehouse/Satellite Accumulation Area (SAA), outside and adjacent to the warehouse			58.84001944, -135.04605
Close-up view of the SAA, showing 55-gallon container of waste aerosol residue with attached aerosol can popper is not closed.			



[Title]			IMG_1645.jpg
09/11/2023 09:52 AM	No CBI	No PII	Photographer: Jon Jones
Warehouse			58.83957777, -135.04615833
View of a plastic sleeve, holding 10 pair of leather gloves.			



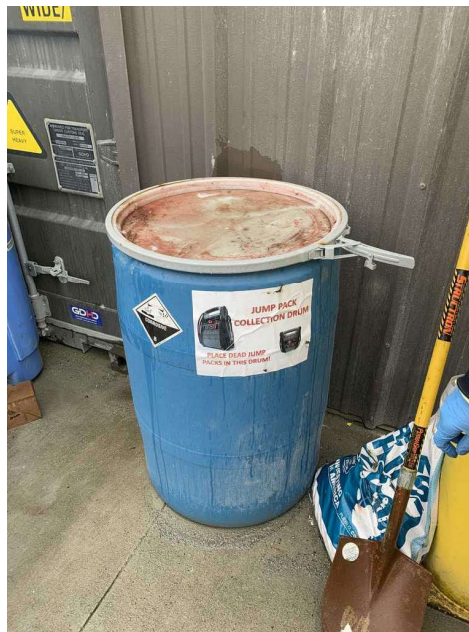
[Title]			IMG_1646.jpg
09/11/2023 09:52 AM	No CBI	No PII	Photographer: Jon Jones
Warehouse			58.83963333, -135.04611111
Close-up view of the information marked on the sleeve of gloves.			



[Title]			IMG_1647.jpg
09/11/2023 09:55 AM	No CBI	No PII	Photographer: Jon Jones
Warehouse			58.83963333, -135.04609722
View of the mining belts that may contain leather components.			



[Title]			IMG_1648.jpg
09/11/2023 10:08 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Area outside and adjacent to the Surface maintenance Shop			58.84078333, -135.04586666
View of a sealed, waste lead-acid battery jump pack inside of a container that is not labeled in a way to indicate it's managed as a universal waste.			



[Title]			IMG_1649.jpg
09/11/2023 10:08 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Area outside and adjacent to the Surface maintenance Shop			58.84075555, -135.04583611
View of the universal waste battery jump pack container, showing that it's not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."			



[Title]			IMG_1650.jpg
09/11/2023 10:13 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Oil filter crusher			58.8409, -135.04600555
View of the filter crusher, showing the unlabeled container of used oil beneath the crusher.			



[Title]			IMG_1651.jpg
09/11/2023 10:13 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Oil filter crusher			58.84086944, -135.04571666
Close-up view of the used oil container, showing that it is not labeled with the words "Used Oil."			



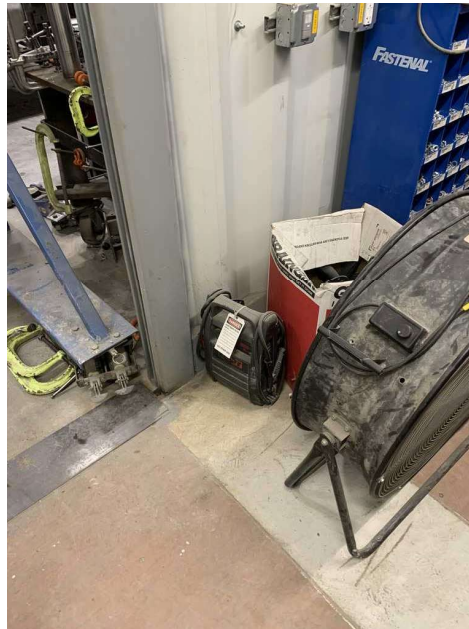
[Title]			IMG_1652.jpg
09/11/2023 10:13 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Oil filter crusher			58.840875, -135.04565555
Close-up view of the used oil container, showing that it contains used oil and is not labeled with the words "Used Oil."			



[Title]			IMG_1653.jpg
09/11/2023 10:13 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Oil filter crusher			58.84109444, -135.04606666
Another view of the used oil container, showing that it is not labeled with the words "Used Oil."			



[Title]			IMG_1654.jpg
09/11/2023 10:13 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Oil filter crusher			58.84108055, -135.04603611
Another view of the container, showing that it holds used oil and is not labeled with the words "Used Oil."			



[Title]			IMG_1655.jpg
09/11/2023 10:24 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Parts Room			58.8409, -135.04600555
View of a waste lead-acid battery jump pack on the floor in the Part Room.			



[Title]			IMG_1656.jpg
09/11/2023 10:24 AM	No CBI	No PII	Photographer: Jon Jones
Surface Maintenance Shop/Parts Room			58.8409, -135.04600555
Close-up view of the waste lead-acid battery jump pack, showing that it is labeled as "Junk" and not labeled with either the phrase "Universal Waste - Battery," "Waste Battery," or "Used Battery."			



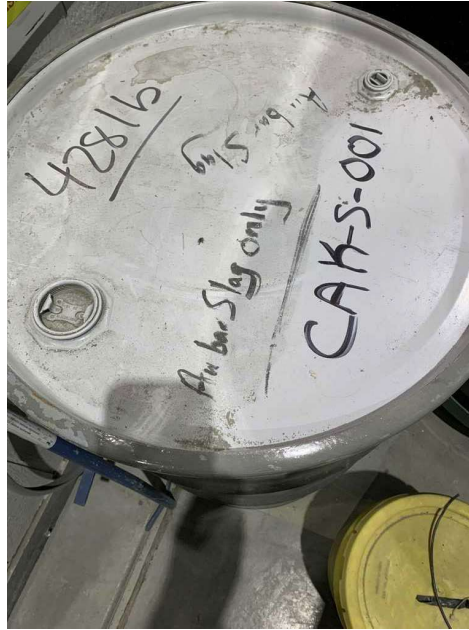
[Title]			IMG_1657.jpg
09/11/2023 10:46 AM	No CBI	No PII	Photographer: Jon Jones
Assay Lab/Area just outside the lab			58.84554722, -135.05026111
View of the 55-gallon container (white lid) holding used crucibles.			



[Title]			IMG_1658.jpg
09/11/2023 10:47 AM	No CBI	No PII	Photographer: Jon Jones
Assay Lab/Area just outside the lab			58.84554722, -135.05026111
View of the used crucibles in the container.			



[Title]			IMG_1659.jpg
09/11/2023 10:51 AM	No CBI	No PII	Photographer: Jon Jones
Assay Lab/Area just outside the lab			58.84554722, -135.05026111
View of the 55-gallon container holding the gold bar slag.			



[Title]			IMG_1660.jpg
09/11/2023 10:51 AM	No CBI	No PII	Photographer: Jon Jones
Assay Lab/Area just outside the lab			58.84554722, -135.05026111
View of the top of the 55-gallon container holding the gold bar slag.			



[Title]			IMG_1662.jpg
09/11/2023 11:03 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)			58.84586388, -135.0504
View of five-gallon waste container, shown here with the lid not fully closed.			



[Title]			IMG_1663.jpg
09/11/2023 11:10 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)			58.84563055, -135.05015555
View of the five-gallon waste container after Ms. Joos closed the container.			



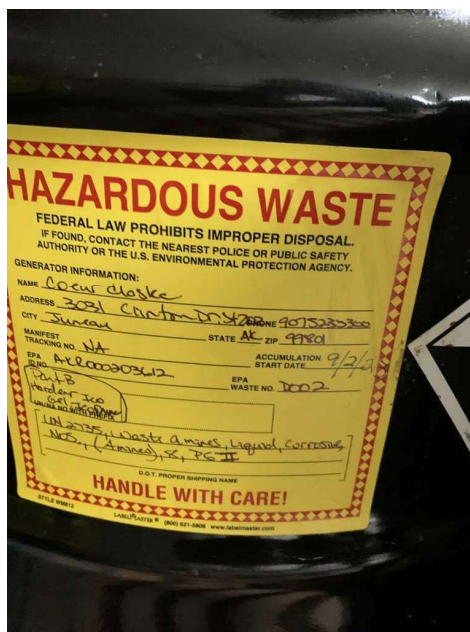
[Title]			IMG_1664.jpg
09/11/2023 11:13 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)/Green Connex adjacent to CAA accumulation locker			58.84598055, -135.05046111
View of the 55-gallon container with the missing ASD.			



[Title]			IMG_1665.jpg
09/11/2023 11:13 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)/Green Connex adjacent to CAA accumulation locker			58.84609166, -135.05059722
View of the label on the container, showing that it is not marked with an ASD.			



[Title]			IMG_1666.jpg
09/11/2023 11:13 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)/Green Connex adjacent to CAA accumulation locker			58.846175, -135.05073611
View of Ms. Joos marking the ASD of 9/2/23 on the container during the inspection.			



[Title]			IMG_1667.jpg
09/11/2023 11:13 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)/Green Connex adjacent to CAA accumulation locker			58.84613888, -135.05064444
View of the label showing the ASD of 9/2/23 that was marked on the container by Ms. Joos during the inspection.			



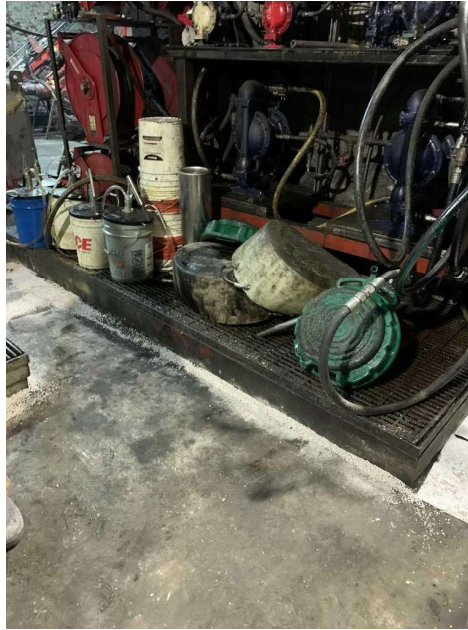
[Title]			IMG_1668.jpg
09/11/2023 11:16 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)/Green Connex adjacent to CAA accumulation locker			58.84592777, -135.05052222
View of the waste from the door of the green Connex.			



[Title]			IMG_1669.jpg
09/11/2023 11:16 AM	No CBI	No PII	Photographer: Jon Jones
Central Accumulation Area (CAA)/Green Connex adjacent to CAA accumulation locker			58.84586666, -135.05050555
View of the signage on the door of the green Connex, showing that it is marked "Non-Hazardous Waste Storage Room."			



[Title]			IMG_1672.jpg
09/11/2023 01:03 PM	No CBI	No PII	Photographer: Jon Jones
Comet Mine Water Treatment Plant (MWTP)/Flammable storage cabinet			[Geographic Coordinates]
View of waste aerosol can that was found inside of a flammable storage cabinet.			



[Title]			IMG_1673.jpg
09/11/2023 01:38 PM	No CBI	No PII	Photographer: Jon Jones
Underground Maintenance at the 900 Main			[Geographic Coordinates]
Another view of used oil drain pad that is not labeled with the words "Used Oil."			



[Title]			IMG_1674.jpg
09/11/2023 01:38 PM	No CBI	No PII	Photographer: Jon Jones
Underground Maintenance at the 900 Main			[Geographic Coordinates]
View of used oil drain pads that are not labeled with the words "Used Oil."			



[Title]			IMG_1675.jpg
09/11/2023 01:40 PM	No CBI	No PII	Photographer: Jon Jones
Underground Maintenance at the 900 Main			[Geographic Coordinates]
View of container, holding a waste lead-acid battery jump pack, seen here not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."			



[Title]			IMG_1676.jpg
09/11/2023 01:40 PM	No CBI	No PII	Photographer: Jon Jones
Underground Maintenance at the 900 Main			[Geographic Coordinates]
Another view of container, holding a waste lead-acid battery jump pack, seen here not labeled with either the phrase "Universal Waste - Batteries," "Waste Batteries," or "Used Batteries."			



[Title]			IMG_1677.jpg
09/11/2023 01:52 PM	No CBI	No PII	Photographer: Jon Jones
Underground Maintenance 940 Paste Plant			[Geographic Coordinates]
View of the SAA container, showing that the attached aerosol can popper cover is open, and the container is not closed.			



[Title]			IMG_1678.jpg
09/11/2023 01:54 PM	No CBI	No PII	Photographer: Jon Jones
Underground Maintenance 940 Paste Plant			[Geographic Coordinates]
View of the SAA container, after Ms. Joos closed the cover on the attached can popper, closing the container.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Communications	Jump Pack Battery Drums Labels.pdf	No	No	Jon Jones	11/17/2023
Communications	Jump Pack Battery Disposal.pdf	No	No	Jon Jones	11/17/2023
Other - Invoice for the sale of used crucibles and gold bar slag	Gold Slag Material Sale.pdf	No	No	Jon Jones	11/17/2023
Contingency Plan	KGM Contingency Plan October 2023.pdf	No	No	Jon Jones	11/17/2023
Contingency Plan	Quick Response Guide Kensington Mine .pdf	No	No	Jon Jones	11/17/2023
Communications	Items Noted During Inspection Update.pdf	No	No	Jon Jones	11/17/2023
Other - Container labeling	Li Ion Battery Drums Labels.pdf	No	No	Jon Jones	11/17/2023
Records Review	Storage Room Inspections Dates.pdf	No	No	Jon Jones	11/17/2023
Personnel Training	Bailey_Ryan_RCRA-DOT_Sep20.2023.pdf	No	No	Jon Jones	11/17/2023
Personnel Training	Foster_Kristal_RCRA-DOT_Ship_EnviroPro_Aug022023.pdf	No	No	Jon Jones	11/17/2023
Personnel Training	JOOS_C~1.PDF	No	No	Jon Jones	11/17/2023
Personnel Training	Lake_Landon_RCRA_Sep21.2023.pdf	No	No	Jon Jones	11/17/2023
Personnel Training	Lammers_Sierra_RCRA-DOT_Ship_EnviroPro_Jul252023.pdf	No	No	Jon Jones	11/17/2023
Personnel Training	Lare_Maureen_RCRADOT_Refresher_08_14_2023.pdf	No	No	Jon Jones	11/17/2023
Personnel Training	RCRA01~1.PDF	No	No	Jon Jones	11/17/2023
Personnel Training	Strow, P RCRA Refresher_12_24_22.pdf	No	No	Jon Jones	11/17/2023
Personnel Training	Wodkowsk John_RCRA Refresh 08_13_2023.pdf	No	No	Jon Jones	11/17/2023
Other - Coeur Alaska Document Request	Coeur Alaska Document Request.docx	No	No	Jon Jones	11/20/2023
Other - EPA Questionnaire	EPA Questionnaire Response Assay Lab FINAL.pdf	No	No	Jon Jones	11/20/2023

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Response Assay Lab FINAL					
Other - EPA Questionnaire Response Water Treatment Plants FINAL	EPA Questionnaire Response Water Treatment Plants FINAL.pdf	No	No	Jon Jones	11/20/2023