

Cripple Creek & Victor Gold Mining Company

Community Right-To-Know

2009 Information Reported 2010

What is TRI?

Congress developed the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) to provide information about certain manufacturing activities to emergency response agencies and the public. Part of EPCRA includes the Toxics Release Inventory (TRI), which requires certain facilities to annually report data on “releases” and management activities for specific chemicals and compounds. In 1997, the Environmental Protection Agency (EPA) expanded its reporting programs to include mine operations such as CC&V’s.

In compliance with the EPA guidelines, CC&V inventories and reports the compounds, which **naturally** occur in the rocks within its operations area.

What is TRI’s Purpose?

- Make information available to the public about compounds used and “released.”
- Reduce chances of accidents.
- Encourage education about use and “release” of these compounds.

What are the Limitations of TRI Data?

- TRI data reflect “releases” of compounds, not the risk of exposure of the public to those substances.
- TRI assumes all compounds are liberated during the reporting year, although most mining related “releases” are associated with native rock that requires decades to millennia to weather.
- TRI does not cover all sources of “releases” such as car emissions.

What is the Nature of the Releases?

- CC&V’s “releases” for lead and mercury include the rock containing naturally occurring metal compounds that is removed and stockpiled to gain access to the ore.
- CC&V’s activities involving the use and “release” of these compounds are in full compliance with existing permits, laws and regulations.

2009 “Releases”

TRI Chemical	Release in Pounds
Ammonia	2,722
Chromium Compounds	0.4
Cyanide Compounds	10
Hydrogen Cyanide	3,205
Lead Compounds	3,282,319
Manganese Compounds	9
Mercury Compounds	1,879
Nitrate Compounds	4,592
Total Release	3,294,736

Please note, rounding of numbers may result in columns not adding up exactly.

2009 “Releases” – By Media

Media	Release in Pounds
“Release” to Air	6,035
“Release” to Water	0
“Release” to Land	3,288,701
Total Release	3,294,736

Naturally Occurring vs. Synthetic Substances

Type	Release in Pounds
Synthetic	12,692
Naturally Occurring	3,282,044
Total Release	3,294,736

History of Reported “Releases”

CC&V has been reporting since reporting year 1998. From 1998 through 2009, between 99.6 to 99.9% of all annually reported “releases” have been naturally occurring metal compounds found in the rock moved for mining operations.

Recycling

Reporting of chromium is required because of CC&V's recycling of scrap metal in accordance with permit approvals. Scrap metal is sent off-site for recycling. If CC&V had chosen not to institute this environmentally sound practice, CC&V would not have reached the reporting threshold for chromium.

2009 Release Report

The 2009 TRI "release" figures do not include overburden material that is excavated and moved from one area to another. Prior to 2002, the naturally occurring components of the rock that were placed in storage areas designed to minimize exposure to the elements were reported as "releases," but a federal district court determined that was inappropriate for "de minimis" constituents. There is no "de minimis" exemption assigned for naturally occurring lead and mercury compounds in overburden rock. Hence part per million concentrations of lead and mercury compounds naturally occurring in the rock are reported as a "release" to land under TRI reporting requirements.