

RESPONSE TO COMMENTS DOCUMENT
NIBLACK MINE DRAFT WASTE MANAGEMENT PERMIT NO. 2013DB001

This document summarizes and addresses comments received on the Niblack Mine Draft Waste Management Permit No. 2013DB001, which was public noticed on January 28, 2013. The Waste Management Permit authorizes and regulates the management of mine waste rock and waste water generated during the exploratory phase of the Niblack Mine. Niblack is a massive sulfide mineral (copper, zinc, gold, and silver) mine located on the southern end of Prince of Wales Island about 30 miles southwest of Ketchikan. Niblack Project, LLC operates the Niblack Mine.

Comments were received from the City of Craig in support of the mine. Comments were also received from the applicant, Niblack Project, LLC. The comments and responses to Niblack Project, LLC are contained in the following table.

Comment #	Comment summary	Comment response
1	The acronym PAG/ML is used throughout the permit. "PAG" stands for Potentially Acid Generating and "ML" stands for Metals Leaching. The prior Waste Management Permit only used the acronym PAG. The applicant requests to the removal of the acronym ML.	Metals leach out of rock and tailings to varying degrees whenever there are acidic conditions at metallic mines. Accordingly, the acronym PAG/ML has been adopted uniformly in Waste Management Permits for mines in Alaska as to better reflect the potential properties of the rock and issues related to its management. The acronym PAG/ML will remain in the permit as it more accurately describes the potential properties of the rock and is consistent with other mine permits.
2	Section 1.2.1.1.5 contains the term "drystack". There is no dry stack at the site and Niblack Project, LLC requests the removal of this term from the permit.	The term has been removed from the permit.
3	Section 1.2.1.1.5 includes a sentence related to Bevill excluded waste. These are wastes from processing ore at an active mine. Since this is not an active mine but the exploratory stage of a mine the applicant verbally requested this sentence be removed.	Agreed and the permit has been amended.

Comment #	Comment summary	Comment response
4	Section 1.2.2.6 requires the permittee to prevent the contact of mine wastes with oxygen. Practically one can minimize oxygen contacting mine waste, rather than preventing it. Niblack Project, LLC requests the term “minimize” be used in this section.	Agreed and the term has been changed to minimize.
5	Section 1.2.4.3 does not specify a time frame in which a written proposal is to be submitted in the event of a malfunction of the land application system. A reporting time frame is requested.	A reporting time frame of five days has been incorporated into this section.
6	Section 1.5.2 uses the phrase "surface impacted groundwater". The aforementioned phrase suggests groundwater quality has been adversely impacted, which has not been shown to be the case. Niblack Project, LLC would prefer the term shallow groundwater be used.	The term has been changed to “groundwater influenced by surface water”.
7	Section 1.5.7.2 states water quality must be monitored weekly. At times the pond may be frozen and a sample not able to be retrieved. Niblack Project, LLC would prefer that the requirement be that sample collection "will follow a weekly monitoring program".	Agreed and the permit has been amended.
8	Section 1.7.2.2 requires "adequate" sampling. Since the term is ambiguous Niblack Project, LLC requests the term be deleted.	The term has been deleted from the permit.