



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

April 27, 1999

Mary Barraco
Manager, Compliance and Regulatory Affairs
Kinross Gold U.S.A., Inc.
185 South State Street
Suite 820
Salt Lake City, Utah 84111

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Ms. Barraco:

This letter responds to your April 19, 1999 letter to the Toxics Release Inventory Branch asking for guidance concerning the applicability of Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) to several Kinross Gold USA (hereafter "Kinross") facilities. Specifically, your letter states that three of the seven mines Kinross owns and operates in the United States have been in closure, or care and maintenance, for more than one year. The three mines in "care and maintenance" are:

Haile Mine	Lancaster County, SC
Sleeper Mine	Humboldt County, NV
Wind Mountain Mine	Washoe County, NV

According to your letter no economic extraction or beneficiation of minerals has occurred at these three mines in 1998. Current closure, or care and maintenance activities at these three mines include environmental monitoring, regrading/recontouring, seeding, facility upkeep, and water treatment/disposal activities.

Based on these representations regarding the activities taking place at the three mining facilities, these facilities do not appear to be primarily engaged in mining activities, as those activities are described in the Standard Industrial Classification (SIC) Manual. If the "environmental monitoring, general facility upkeep, and water treatment/disposal activities," taking place at these facilities do not include any of the mining activities described in Major Group 10 of the SIC Manual, then these facilities would not fall under SIC Code 10 - Metal Mining, and these facilities would not have to consider the requirements of EPCRA Section 313 based on that particular SIC Major Group.

I hope this information is helpful to you in making threshold determinations and release and other waste management calculations for Section 313 of EPCRA. If you have any other questions, or desire further information, please call either Larry Reisman at 202.260.2301 or me at 202.260.9592.

Sincerely,

A handwritten signature in black ink, appearing to read "Maria J. Doa". The signature is fluid and cursive, with a long horizontal stroke at the end.

Maria J. Doa, Ph.D., Chief
Toxics Release Inventory Branch