

MEMORANDUM OF AGREEMENT
AMONG THE US ENVIRONMENTAL PROTECTION AGENCY,
THE VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION, and
THE VERMONT STATE HISTORIC PRESERVATION OFFICE
FOR CLEANUP OF THE ELY COPPER MINE,
IN VERSHIRE, VERMONT
November 2019

WHEREAS, the United States Environmental Protection Agency (EPA) has listed the Ely Copper Mine in east central Vermont (the “Site”) on the National Priorities List pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601 et seq. (CERCLA); and

WHEREAS, EPA, pursuant to 36 CFR § 800.4 (c), has determined the Ely Copper Mine, its associated features and landscapes including, but not limited to, the shafts and adits; foundations; smoke flue; roast beds; and smelter site to be eligible for inclusion in the National Register of Historic Places (NR) under Criteria A, B, C, and D. Based on these criteria, the Ely Copper Mine is significant at the local, state and national level in areas including Commerce, Economics, Engineering, Industry, Invention and Historic Non-Aboriginal Archaeology; and

WHEREAS, the Ely Copper Mine is one component of the Orange County Mining District, encompassing also Elizabeth Mine in Strafford, VT, and Pike Hill Mine in Corinth, VT, a district that has been determined to be eligible for the NR; and

WHEREAS, EPA has selected Remedial Actions (RAs) to clean up the Site. The RAs are documented in two Records of Decisions (RODs) signed September 28, 2011 (Operable Unit 1) and June 23, 2016 (Operable Units 2 and 3) as modified by an Explanation of Significant Differences signed September 25, 2019. Each RA was presented to the public in a Feasibility Study and Proposed Plan that was subject to a 30-day public comment period following the issuance of each Proposed Plan. The ESD was also subject to a comment period following the issuance of a public information fact sheet; and

WHEREAS, the RAs will involve activities that will disturb the historic industrial landscape including, but not limited to: removal of the contaminated waste rock, soil and sediment, as applicable, in the Upper Waste Area, Lower Waste Area, Tailings Area, Ore Roast Bed area, Deep Adit, Pond 4, Pond 5 and along Ely Brook and its tributaries; collection and possible treatment of water discharging from the Main Adit and Deep Adit; hauling of source rock, soil, construction equipment, and fill, installation and maintenance of access roads, and use of off-site and on-site borrow areas and construction staging areas; and increased truck traffic; and

WHEREAS, a qualified professional is a person meeting the requirements identified in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716, 1983); and

WHEREAS, EPA established the area of potential effect (APE), as defined at 36 CFR § 800.16 (d), to include the Ely Copper Mine and its associated features, the towns of Vershire and West Fairlee, and any borrow areas and haul roads with the area of direct effects being approximately 175 acres; and any areas of indirect effects yet to be determined (See Figure 1 for the extent of the APE and the location of historic features at the Site); and

WHEREAS, EPA determined the Ely Copper Mine remediation will have adverse effects on historic properties pursuant to 36 CFR § 800.6; and

WHEREAS, EPA, the Vermont State Historic Preservation Office (SHPO) and Vermont Department of Environmental Conservation (VTDEC) after extensive deliberation and consultation with stakeholders have concluded that in-depth historic and archaeological documentation and interpretation must be performed for those features where avoidance and/or preservation in place is not possible; and

WHEREAS, wherever possible, the remedy will maximize in-place preservation of historic sites, historic features and historic landforms; and

WHEREAS, EPA produced reports for identification and evaluation of historic properties along with geographic information system (GIS) based maps (references provided in Appendix B); and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), EPA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the VTDEC will assume operation and maintenance of the cleanup at the Ely Copper Mine site once EPA has completed the installation of the response action and in accordance with the State Superfund Contract between EPA and VTDEC for the Ely Mine Superfund Site; and

WHEREAS, EPA invited the VTDEC to participate in the consultation and sign this Memorandum of Agreement (MOA); and

WHEREAS, the Ely Copper Mine and its environs are on lands privately owned; and

WHEREAS, EPA consulted with the Towns of Vershire and West Fairlee and has invited them to concur in this MOA; and

WHEREAS, EPA, as part of the developments of the RODs, mailed several public information fact sheets summarizing the project and the historic properties to residents of Vershire, West Fairlee, and held public meetings to discuss the cleanup project and historic properties; and

NOW, THEREFORE, EPA, the VTDEC and Vermont SHPO agree that upon EPA's decision to proceed with the implementation of the RAs, EPA shall ensure that the following stipulations are implemented in order to take into account the effects of the remediation on historic properties

and that these stipulations shall govern the Site and all of its parts until this MOA expires or is terminated.

STIPULATIONS

EPA shall ensure that the following stipulations are implemented. The area of potential effects is depicted on Figure 1.

I. Avoidance

- A. The final design plans for the RAs have identified the areas to be avoided and areas where significant historic features may be encountered. In particular, the Smoke Flue and foundations west of Ely Brook and along Vershire Road shall be avoided along with the Main Shaft and associated features, which include the Main Adit and Burleigh Shaft foundations.
- B. The final design plans for the RAs include visual measures or barriers (i.e., snow fencing, caution tape) to alert on-site personnel of the presence of historic resources to be avoided on locations where there may be clearing or ground disturbing activities in close proximity to these historic resources. The prime contractor's on-site project manager will review with construction personnel the procedures to avoid impacts to historic resources in the daily briefing whenever work will occur near such areas.
- C. At the beginning of the construction season and at other key points of the construction season, the EPA Remedial Project Manager will brief construction personnel on the historic areas to be avoided during construction activities.

II. Assessment of Effects

- A. EPA retained a qualified professional to review the design for the RAs, including any associated restoration plans prior to the Vermont SHPO's review. A copy of the reviewer's comments has been forwarded to the VTDEC and Vermont SHPO.
- B. The design for the RAs was provided to the VTDEC and Vermont SHPO for consultation, review and comment. The design for the RAs identified the anticipated adverse effects from the activities to be implemented and the measures, if any, that will be taken to minimize the adverse effect.
- C. EPA will notify the VTDEC and Vermont SHPO within ten business days of EPA's discovery of the potential for any unforeseen direct adverse effects to historic properties, previously identified or new, within the APE. EPA will consult with the SHPO to identify the appropriate response to address such unforeseen direct adverse effects. An appropriate response could include archaeological data recovery, construction monitoring, photo documentation, or other measures based on the nature of the historic property.

- D. Paragraph II.C above does not relate to any unforeseen discovery of human remains and associated funerary objects. The procedures to address such unforeseen discovery are described in Appendix A to this MOA.
- E. EPA will consult with the Vermont SHPO regarding any indirect adverse effects that may occur to historic properties as a result of the RAs. The construction implementation plans will identify those measures that will be taken to minimize the indirect adverse effects on historic properties. If avoidance or minimization is not possible, or if an inadvertent adverse effect occurs, EPA will consult with the Vermont SHPO to resolve any adverse effects.

III. Artifact Collection, Care, and Management

- A. All artifacts collected by qualified professionals during any investigations of any phase of the cleanup belong to the specific landowner of the property where the artifacts were located. Inventories will be developed and given to the respective landowners, to the Vermont SHPO, and to the Vershire Historical Society within one year of collection or one year of the effective date of this MOA, whichever is later.
- B. The artifacts will be returned to the landowner, unless the landowner agrees in writing to an alternative arrangement for disposition of the artifacts, following analysis by qualified professionals within one year of collection. If the landowner does not want the artifacts, the final disposition will be determined through consultation among the Signatories of this agreement.
- C. EPA and the Vermont SHPO will encourage landowners to donate historic mining equipment and any other artifacts that may be useful for interpretive exhibits. The Vermont SHPO will designate the acceptable curatorial facilities for all donations in consultation with the donating landowner.

IV. Cleanup Action Activities

A. Pre-Construction Landscape Assessment

1. Prior to initiation of the construction activities, EPA will have a qualified professional perform a site reconnaissance of the Upper and Lower Waste Areas and the Ely Brook Tributaries to determine if any additional features have been exposed or identified since the original recording on the previous GIS maps.
2. EPA will have the GPS site map and GIS database updated, as necessary, to reflect any newly identified features.
3. EPA will obtain ground and air digital photos prior to construction activities and provide an accompanying photo index and narrative description, as necessary.

4. EPA will perform a LiDAR survey of the Ore Roast Beds and Smelter site prior to disturbance of this historic property.
5. EPA will have a qualified individual take 18-24 large format film photographs of standing foundations and masonry structures including the Main Adit portal, Flotation Mill, waste areas, etc. as well as a digital photo mural for the Ore Roast Bed.
6. Any additional activities that may be required to document newly-exposed features that are deemed to have historical significance will be discussed with the Vermont SHPO prior to EPA undertaking construction.

B. Data Recovery

1. A Data Recovery Plan shall be developed for those areas where pre-construction documentation is required. The plan shall address and incorporate the research questions and identify the methods for data recovery, artifact curation and storage, and final reporting.
2. The Vermont SHPO shall be provided the Data Recovery Plan for review and comment at least 120 days prior to the start of the field work.
3. As described above in Paragraph II.D, any unforeseen discovery of human remains and associated funerary objects during data recovery will be addressed following the procedures described in Appendix A to this MOA.
4. Unexpected discoveries that are not subject to Appendix A, shall be addressed following the procedures in Paragraph II.C above.

C. Construction Monitoring

1. A detailed plan for monitoring ground-disturbing construction within areas identified for construction monitoring shall be submitted to the Vermont SHPO at least sixty days prior to the initiation of the ground-disturbing activities.
2. Construction monitoring will be performed for those areas identified as requiring construction monitoring in the OU1 and OU2 Remedial Design. Some OU4 areas, such as the Smelter site may also require monitoring if staging areas are located in this area to support the OU1 and OU2 implementation.
3. As described above in Paragraph II.D, any unforeseen discovery of human remains and associated funerary objects during construction monitoring will be addressed following the procedures described in Appendix A to this MOA.

4. Unexpected discoveries that are not subject to Appendix A, shall be addressed following the procedures in Paragraph II.C above.

D. Borrow Material

1. Sole source borrow areas for the RAs (EPA or EPA contractor developed) that are not within the Ely Copper Mine Superfund Site or the previously identified Green Crow borrow area will be assessed by qualified professionals to identify and evaluate any historic properties that may exist in the borrow area APE.
2. If historic properties are going to be adversely affected by borrow material removal as part of the RAs, EPA will consult with the Vermont SHPO to determine how to address the effects prior to removing any borrow material.
3. EPA will consult with the Vermont SHPO and other appropriate parties to avoid obtaining material from a commercial borrow facility that may also contain historic properties, human remains or funerary objects.
4. EPA will continue to consult with the Vermont SHPO regarding the off-site haul routes by periodically updating the maps identifying the anticipated haul routes. Based on feedback from the Vermont SHPO, EPA will make reasonable efforts to minimize the impact of material hauling on historic properties and will consult with the Vermont SHPO to resolve any adverse affects.

V. Reports and Educational Products

A. Technical Reports

1. Multiple technical reports and detailed project maps with identified historic features and structures have been produced to date and are referenced by title in this document. The technical reports are identified in Appendix B.
2. EPA will have a qualified professional produce a report detailing the data recovery and construction monitoring activities including the results and interpretation of features and artifacts following the completion of the RAs cleanup actions. The Vermont SHPO and VTDEC will be provided an opportunity to review and comment on the report.
3. EPA shall have a qualified individual create a set of drawings illustrating the Ely Copper Mine site and mining and industrial processes. These shall be similar to those done at Elizabeth Mine Superfund Site in Strafford, Vermont, following Historic American Engineering Record standards and guidelines and include: a cover sheet with Site map, diagram of the mining process and underground workings, flotation mill, ore roast bed, and other key features.

4. EPA will submit any updated archaeological spatial information to the Vermont SHPO as shape files as new site data becomes available subsequent to various cleanup actions.
5. Complete copies of the technical reports and addendum will be provided to the Vermont SHPO on DVD.

B. Popular Reports and Other Educational Products

1. EPA will develop an illustrated popular report that describes the historic developments and mining processes at the Ely Copper Mine for the general public. The report will also include a discussion of the environmental impacts associated with the Ely Copper Mine and cleanup activities. The format (look and feel) should be consistent with the popular report created for the Elizabeth Mine Superfund Site (*From Copperas to Cleanup*, Milestone Heritage Consulting). A draft will be provided to the Vermont SHPO, VTDEC, Vershire Selectboard, West Fairlee Selectboard, Vershire Historical Society and West Fairlee Historical Society for review and comment.
4. EPA will develop and fabricate a set of interpretive panels (approximately 10) interpreting the historical and industrial features at the Ely Copper Mine. The format (look and feel) should be consistent with the interpretive panels created for the Elizabeth Mine Superfund Site. Drafts of all interpretive products will be provided to the Vermont SHPO, VTDEC, Vershire Selectboard, West Fairlee Selectboard, Vershire Historical Society and West Fairlee Historical Society for review and comment.

C. Distribution of the Popular Report and Other Educational Products

1. EPA will distribute copies of the popular report to the Signatories and Concurring Parties of this agreement and to applicable landowners. The Vermont SHPO will receive 100 copies of the popular report.
2. EPA will distribute copies of the technical reports and the popular report to the designated public repositories: Special Collections at the Bailey-Howe Library at the University of Vermont, the Dartmouth College Library, and the Vermont Historical Society, as well as other locations upon request.
3. EPA will provide copies of the popular report and other educational products specified in B, above, to the Vermont SHPO on a DVD(s) so it may disseminate this information to any additional parties as appropriate and post on the Internet as appropriate.

VI. Dispute Resolution

- A. EPA shall consult with any Signatory to this agreement, in accord with 36 CFR § 800.6 (c)(1), if there is an objection by a Signatory to the manner in which the terms of the agreement are implemented.
- B. If EPA determines that the objection cannot be resolved among the involved parties, the EPA shall forward all documentation relevant to the dispute to the ACHP in accordance with 36 CFR § 800.2(b)(2). After reviewing the documentation, the ACHP will either:
 - 1. Provide EPA with recommendations, which EPA can take into account in reaching a final decision regarding the dispute; or
 - 2. Notify EPA that it will comment pursuant to 36 CFR §800.7(c) and proceed to comment. EPA will take into account any ACHP comment provided in response to such a request in accordance with 36 CFR § 800.7(c)(4) with reference to the subject of the dispute.
- C. Any recommendation or comment provided by the ACHP will pertain only to the subject of the dispute. EPA's responsibility to carry out all actions under this agreement that are not subjects of the dispute will remain unchanged.

VII. Amendment

Any Signatory to this agreement, in accord with 36 CFR § 800.6 (c)(1), may request that the other Signatories consider amending it if circumstances change over time and warrant revision of the stipulations. Amendments will be executed in the same manner as the original MOA.

VIII. Termination

- A. Any Signatory to this agreement, in accord with 36 CFR § 800.6 (c)(1), may initiate consultation for termination by providing 30 business days notice to the other parties of their intent. After notification by the initiating Signatory, the remaining Signatories will have 60 business days to consult to seek agreement on amendments or any other actions that would address the issues and avoid termination.
- B. In the event of termination, EPA will seek the ACHP's comment on any remaining adverse effects to historic properties only for the project and terms of this agreement.

IX. Sunset Terms

- A. This agreement shall be null and void if its terms are not carried out within twenty years from the date of its execution, unless the Signatories agree in writing to an extension for carrying out its terms.
- B. In the event the cleanup is not funded and will not occur, EPA is not obligated to perform the mitigation tasks as identified in this agreement.

Execution of this Memorandum of Agreement and implementation of its terms is evidence that EPA has afforded the ACHP an opportunity to comment on all response activities at the Ely Copper Mine Site.

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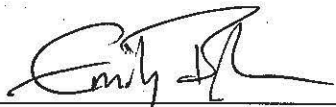
Signatory

BRYAN OLSON Digitally signed by BRYAN OLSON
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Bryan Olson, Director
Superfund and Emergency Management Division
United States Environmental Protection Agency

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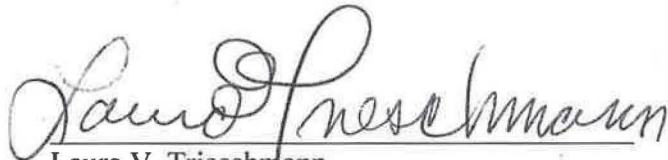
Emily Boedecker, Commissioner
Vermont Department of Environmental Conservation

1/16/20

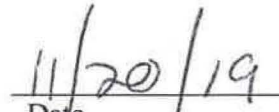
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IN VERSHIRE, VERMONT

Signatory



Laura V. Trieschmann
Vermont State Historic Preservation Officer



Date

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Concurring Party



Vernal Stone, Chair
Town of Vershire Selectboard

7-28-2022
Date

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Concurring Party



Delsie Hoyt, Chair
Town of West Fairlee, Selectboard

1/20/2020
Date
Approved by Selectboard

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Concurring Party

GARY W. GOODRICH

Gary W. Goodrich

President

Vershire Historical Society

12/21/2020

Date

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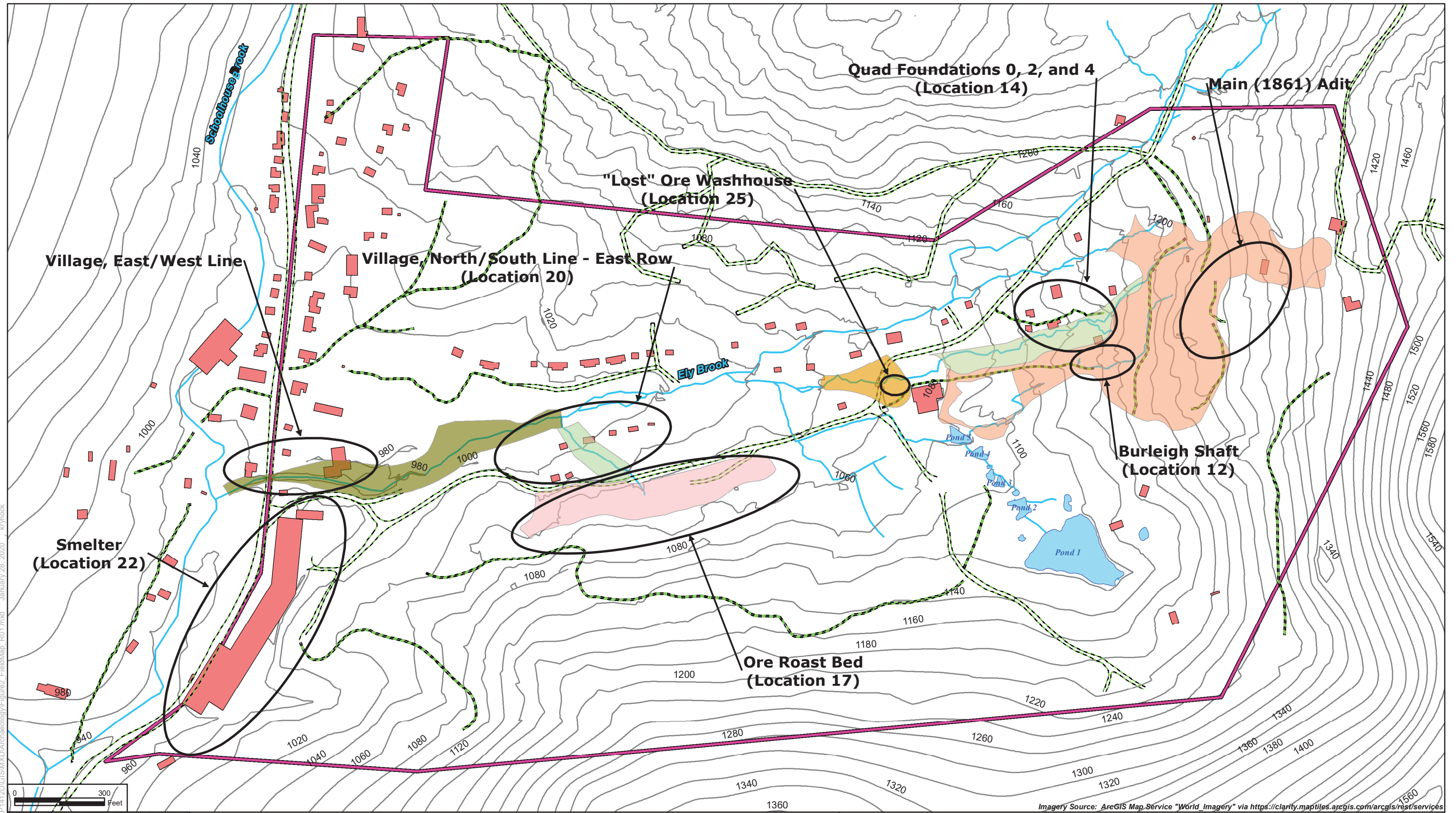
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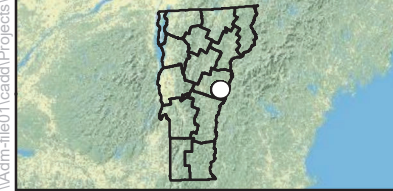
Dwight Hill Forest, LLC

1/28/2020

Date



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|----------------------------|--------------------|----------------------|
| Area of Potential Effects | Ore Roast Bed Area | Water |
| Ely Brook Lower Reach Area | Tailings Area | Access Road Contours |
| Ely Brook Tributary 1 Area | Upper Waste Area | Topographic Contours |
| Ely Brook Tributary 3 Area | Features | Streams |

Imagery Source: ArcGIS Map Service "World Imagery" via <https://clarity.maptiles.arcgis.com/arcgis/rest/services>

Figure 1 Ely Copper Mine MOA
Extent of Area of Potential Effect (APE) and Location of Historic Features
 Ely Copper Mine Superfund Site
 Vershire, Vermont

Appendix A: Unanticipated Discoveries of Human Remains
and Associated Funerary Objects
Memorandum of Agreement – Ely Copper Mine

Procedures for Unanticipated Discoveries

I. Definitions

- A. Unanticipated discoveries in the context of this MOA only applies to human remains and associated funerary objects.
- B. Associated funerary objects include those objects placed intentionally with human remains and are physically associated in space with such remains. The location of objects within the grave fill or in immediate proximity to human remains shall be understood to evidence intentional placement with human remains.
- C. Native American means of, or relating to, a tribe, people or culture that is indigenous to the United States.
- D. Cultural affiliation means that there is a relationship of shared group identity which can be reasonable traced historically or prehistorically between a present day Native American group and an identifiable earlier group.

II. Plan of Action

- A. Construction activities in the area of the unanticipated discovery shall cease if human remains, associated funerary objects or graves are discovered. The on-site project manager will contact immediately the EPA Remedial Project Manager (RPM). Protective measures such as barriers or fencing will be erected until the plan for treatment is completed.
- B. The EPA RPM will notify the medical examiner or appropriate law enforcement official of Orange County, VT, the VT State Archaeologist, and the property owner. Pending determination of jurisdiction by the medical examiner or law enforcement official, EPA will have a qualified professional determine the cultural affiliation and approximate age of the remains, if appropriate.
- C. If the human remains are determined to be of Native American cultural affiliation, EPA shall immediately notify the representatives of those Native American groups with an expressed interest in this geographical region.
- D. EPA will consult with Native Americans to develop a specific plan for treatment of the human remains and any associated funerary objects. The treatment plan may include any analysis that may be necessary for identification, method of transporting the remains and objects, temporary storage if necessary, curation if appropriate and repatriation.

- E. Construction in the area may commence once EPA, in consultation with the appropriate authorities, has determined the unanticipated discoveries have been addressed in the appropriate manner.

Appendix B: References
Memorandum of Agreement – Ely Copper Mine

Milestone Heritage Consulting Technical Memorandum Ely Copper Mine Site Remediation
Vershire, Vermont, Section 106 NHPA Compliance Support: Operable Unit 1 and 2
Part 2: OU1 and OU2 Combined Updated Cultural Resource Impacts & Recommendations
June 1, 2019

Milestone Heritage Consulting, Section 106 NHPA Compliance Support, Pre-Final Basis of
Design Review, Ely Copper Mine Superfund Site, Operable Unit 01. Prepared by Nobis
Engineering: September 2018

Milestone Heritage Consulting, Vermont Division for Historic Preservation Comments
Regarding: May 7, 2018 Site Visit and Technical Memorandum #9, June 3, 2018

Milestone Heritage Consulting, Technical Memorandum, Ely Copper Mine Site Remediation,
Vershire, Vermont. Section 106 NHPA Compliance Support Cultural Resources Comments
Regarding: Technical Memorandum #9. Updated OU1 Containment Cell Remedy Comparison,
Ely Copper Mine Superfund Site, Operable Unit 01 Prepared by Nobis Engineering: April 2018.

Milestone Heritage Consulting, Technical Memorandum, Ely Copper Mine Site Remediation,
Vershire, Vermont. Section 106 NHPA Compliance Support: Test Pit Monitoring October 5,
2016.

Milestone Heritage Consulting, Technical Memorandum, Ely Copper Mine Site Remediation,
Vershire, Vermont. Section 106 NHPA Compliance Support: Draft Intermediate Basis of Design
Report: Final Cultural Resources Comments. December 29, 2015

Milestone Heritage Consulting (2015). Technical Memorandum, Ely Copper Mine Site
Remediation, Vershire, Vermont Section 106 NHPA Compliance Support: Draft Intermediate
Basis of Design Report: Review July 15, 2015. <https://semspub.epa.gov/src/document/01/577672>

Milestone Heritage Consulting (2015), Technical Memorandum, Ely Copper Mine Site
Remediation, Vershire, Vermont. Section 106 NHPA Compliance Support: University of
Vermont Archival Research. July 4, 2015.

Milestone Heritage Consulting, Technical Memorandum Ely Copper Mine Site Remediation,
Vershire, Vermont. Section 106 NHPA Compliance Support: Draft OU2/OU3 Feasibility Study
Review. July 27, 2015.

Milestone Heritage Consulting, Technical Memorandum, Ely Copper Mine Site Remediation
Vershire, Vermont. Section 106 NHPA Compliance Support: RD-FI Phase II, Test Pit
Monitoring and Soil Borrow Area Walkover/Flagging. July 3, 2013.

Milestone Heritage Consulting, Technical Memorandum, Ely Copper Mine Site Remediation, Vershire, Vermont. Section 106 NHPA Compliance Support: RD-FI Test Pit Monitoring and Ore Roast Bed Wall Documentation. February 11, 2013.

Milestone Heritage Consulting, Technical Memorandum Ely Copper Mine Site Remediation, Vershire, Vermont. Section 106 NHPA Compliance Support: Draft RD-FIP Technical Review, September 19, 2012.

July 2011, Letter from ACHP documenting that ACHP did not need to be involved.
<https://semspub.epa.gov/src/document/01/486556>

June 2011, Letter to ACHP – Notification of Adverse Effects.
<https://semspub.epa.gov/src/document/01/486557>

Public Archaeology Laboratory (2011) Technical Memorandum, Ely Copper Mine Site Remediation, Vershire, Vermont, Section 106 NHPA Compliance Support, May 13, 2011, PAL No. 2366.01

Public Archaeology Laboratory (2005) “Historic/Archaeological Mapping and Testing, Ely Mine Site Volume I and Volume II”. Final report prepared for the US Army Corps of Engineers, New England District, PAL Report No. 1386, January.
<https://semspub.epa.gov/src/document/01/486505>

Kierstead, M. A., 2001. History and Historical Resources of the Vermont Copper Belt. Society of Economic Geologist Guidebook Series, v. 35, p. 165-191

Historical Context and Preliminary Resource Evaluation of the Elizabeth Mine, South Strafford, Orange County, VT. May 2001, Public Archaeological Laboratory, Inc.