UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

June 26, 2014

Ref: 8ENF-RC

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7008 3230 0003 0725 8563

Wayne Berson, CEO
BDO USA, LLP
601 West Riverside Avenue
Suite 900
Spokane, WA 99201-06011

Re: Request for Information Pursuant to Section 104(e) of CERCLA
Gilt Edge Mine Site, Lawrence County, South Dakota, SSID # 08-7T

Dear Mr. Berson:

This letter seeks your cooperation in providing information and documents relating to the Gilt Edge Mine Site located approximately 4.5 miles southeast of the town of Lead in the northern Black Hills of Lawrence County, South Dakota (Site). The U.S. Environmental Protection Agency (EPA) is investigating the identification, nature and quantity of materials that have been generated, treated, stored or disposed of at, or transported to, the Site; the nature or extent of the release of a hazardous substance, pollutant or contaminant at the Site; and information relating to the ability of persons to pay for or to perform a cleanup at the Site.

Pursuant to the authority of section 104 of the Comprehensive, Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604, as amended, you are hereby requested to respond to the Information Request set forth in Enclosure 1, attached hereto. The EPA is writing this letter to you because it has reason to believe that you provided accounting services to CoCa Mines, Inc., Hecla Limited, Inc. (f/k/a Hecla Mining Company), and/or Hecla Mining Company, and have information relevant to this investigation.

Please respond to the Information Request within 30 days. Failure to respond fully and truthfully, or to adequately justify your failure to respond, can result in an enforcement action by the EPA, pursuant to section 104(e) of CERCLA, and the imposition of penalties of up to $37,500 per day of non-compliance. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

The Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Your response to this request must be accompanied by a notarized certificate that is signed and dated by the person who is authorized by you to respond to this request. The notarized certificate must state that the response submitted to the EPA is complete and contains all documents and information responsive to this request that are known to you following a complete and thorough review of all information and sources available to you. A suggested format for the notarized certificate is included with this request as Enclosure 2.

The response to the Information Request should be mailed to:

U.S. Environmental Protection Agency
Region 8
Attn: Sharon Abendschan (8ENF-RC)
1595 Wynkoop Street
Denver, CO 80202-1129

The EPA strongly encourages you to give this matter your immediate attention and respond to the Information Request within the time specified above. If you have any questions relating to this Information Request, please contact Andrea Madigan, EPA Supervisory Attorney, at (303) 312-6904 or Sharon Abendschan, EPA Enforcement Specialist, at (303) 312-6957. Thank you for your cooperation in this matter.

Sincerely,

Kelcey Land

Kelcey Land, Director
RCRA/CERCLA Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Andrea Madigan

Andrea Madigan
Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Enclosures

cc: Joseph G. Middleton, ESQ
Amelia Piggott, 8ENF-L
Joy Jenkins, 8EPR-SA
Sharon Abendschan, 8ENF-RC
Dianna Lim, 8EPR-PS

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ENCLOSURE 1

INSTRUCTIONS FOR THE INFORMATION REQUEST
Gilt Edge Mine Site, Lawrence County, South Dakota, SSID 08-7T
Request #1

1. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.

2. Precede each answer with the number of the Question to which it corresponds.

3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.

4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it corresponds.

5. The information requested herein must be provided even though the Respondent may contend that it includes possible confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to section 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. § 9604(e)(7)(E) , and 40 C.F.R. section 2.203(b). To prove your claim for confidentiality, you must provide the following information for each document for which confidentiality is claimed:

   a. the portions of the information claimed to be entitled to confidential treatment;

   b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);

   c. measures taken by you to guard against the undesired disclosure of the information to others;

   d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;

   e. pertinent confidentiality determinations, if any, by the EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and

f. whether you assert that disclosure of the information would be likely to result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information, and that you intend to continue to do so, and that it is not, and has not been, obtainable by legitimate means without your consent. Information covered by such a claim will be disclosed by the EPA only to the extent permitted by CERCLA section 104(e). If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you.

6. In accordance with 40 C.F. R. section 2.310(h), information that you submit in response to this Information Request may be disclosed to authorized representatives of the United States even if you assert a confidentiality claim. Please be advised that the EPA may disclose your responses to this Information Request to a private enforcement support services contractor employed by the EPA for the purpose of organizing and analyzing the response to this Information Request. The EPA contractor can only use the information for the purpose of carrying out the work required under the contract and must maintain the confidentially of such information. See 40 C.F.R. section 2.301(h)(B). If you are submitting information you claim to be entitled to treatment as confidential business information, you may comment on this possible disclosure to the EPA Enforcement Specialist identified above within fourteen days of receiving this Information Request.

DEFINITIONS AND INFORMATION
Gilt Edge Mine Site, Lawrence County, South Dakota, SSID 08-7T
Request #1

The following definitions shall apply to the following words as they appear in this Enclosure:

For purposes of this Information Request, the term "you" or "Respondent" shall mean BDO USA, LLP and any predecessor, successor or other subsidiary company of such entities.

1. The term "CERCLA" means the Comprehensive Environmental Response, Compensation and Liability Act, and can be found at Volume 42, United States Code (U.S.C.), Section 9601, et seq.

2. The terms "document" and "documents" shall mean any written, recorded or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts and all non-identical copies.

3. "Hecla Limited, Inc." shall mean Hecla Limited Inc., a Delaware corporation and parent company to CoCa Mines, Inc.

4. "Hecla Mining Company" shall mean Hecla Mining Company, a Delaware corporation and parent company to Hecla Limited, Inc.

5. "CoCa Mines" shall mean CoCa Mines, Inc., a Colorado corporation and subsidiary of Hecla Limited, Inc.

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. § 9601, et seq.; RCRA, 42 U.S.C. § 6901, et seq.; or their regulations found at 40 C.F.R. Part 300 and 40 C.F.R. Part 260, et seq. respectively, in which case the statutory or regulatory definitions shall apply.

QUESTIONS
Gilt Edge Mine Site, Lawrence County, South Dakota, SSID 08-7T
Request #1

1. Identify the person(s) answering these Questions by providing their name, address, fax and telephone number.

2. Identify the person(s) whom you wish to receive all further communications from the EPA related to the Property.

3. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

4. For each and every Question contained herein, identify documents consulted, examined, or referred to in the preparation of the answer or that contains information responsive to the Question and provide accurate copies of all such documents.

5. Provide copies of all documents in your possession, custody, and control relating to Hecla Limited, Hecla Mining Company, and CoCa Mines, Inc. from 2006 through the present.

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ENCLOSURE 2

NOTARIZED CERTIFICATE

I,_____, having been duly sworn and being of legal age, hereby state:

1. I am the person authorized by BDO USA, LLP to respond to the Environmental Protection Agency's (EPA's) request for information concerning the Gilt Edge Mine Site located in Lawrence County, South Dakota.

2. I have made a complete and thorough review of all documents, information, and sources relevant to the request.

3. I hereby certify that the attached response to EPA's request is complete and contains all information and documents responsive to the request.

(Signature) _____

(Name) _____

(Title) _____

(SEAL)

Subscribed and sworn to me
This_____day of_____, 2014.

_____
Notary Public

My Commission Expires_____
My address is_____
_____