

CASO

ATLAS ASBDO

**ATLAS ASBESTOS MINE
ISSUE RESOLUTION PROPOSALS**

ISSUE: Respond to EPA request for 15% contribution

RESOLUTION: Offer EPA to do ^{(limited list of stewardship activities on the land} ~~equivalent to 15% of future costs.~~ (O&M work) definitionally ^(changed)

Refuse to pay for past EPA costs.

Refuse to make any statement of liability.

Refuse to accept any obligation for capital or construction costs if the case is reopened.

Require anti-deficiency protection.

~~Refuse to sign FFA; accept only a Section 122 agreement or equivalent, with no stipulated penalty.~~

CONSULT WITH

TO IMPLEMENT THIS, IF IT IS SO DECIDED, WE WILL NOTIFY JUSTICE AND NEGOTIATE WITH EPA AT THE REGIONAL LEVEL.

AND

IF THESE POSITIONS CANNOT BE MET, THE BLM/DOI WILL GO TO DOJ ~~OR~~ OMB CONTINUING THE INNOCENT LANDOWNER DEFENSE.

ISSUE: Respond to EPA inclusion of the Clear Creek Management Area in the NPL Site.

RESOLUTION: Continue to challenge the inclusion at the Regional and Headquarters levels.

Initiate a full review of the data on which the EPA decision is based.

and

IF NO AGREEMENT WITHIN 6 MONTHS (DRAFT RMP AMENDMENT) GO TO DOJ ~~OR~~ OMB.