

Harding Lawson Associates



October 31, 1988

18157,018.02

U.S. Bureau of Land Management (BLM)
Department of Interior
WO 509 - Room 3529
Washington, D.C. 20240

Attention: Mr. Bernie Hyde
Chief, Hazardous Materials Staff

Dear Bernie:

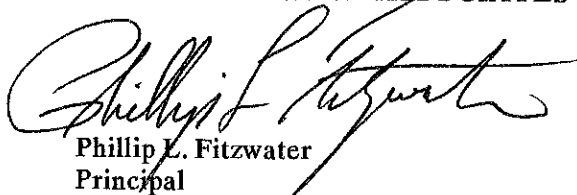
I enjoyed our discussion this morning regarding asbestos related activities near Coalinga, California, and I am looking forward to working with you to expedite an effective resolution to the problems the area represents.

Enclosed is a copy of a letter that I drafted for Mr. Tim Moore in Hollister, California. The letter includes suggestions on how BLM's digitized map files might be used to understand the contributions to regional sediment and asbestos loading from various natural and anthropogenic sources. I will be following up on the mapping suggestions with Tim.

If I can be of assistance to you at any time during this project, please contact me.

Very truly yours,

HARDING LAWSON ASSOCIATES


Phillip L. Fitzwater
Principal

Enclosure

PLF/tg/a33

Fitzwater

Harding Lawson Associates



October 27, 1988

18157,017.02

U.S. Bureau of Land Management
P.O. Box 365
Hollister, California 95024

Attention: Mr. Tim Moore

Gentlemen:

**Geographic Information System Utilization
Mountain Asbestos Plan
Coalinga, California**

I was pleased to have the opportunity to discuss the Bureau of Land Management's (BLM) involvement with asbestos related activities in and around Coalinga, California. Harding Lawson Associates (HLA) represents Vinnell Corporation, a one-time operator of the Atlas mine and mill site north of Coalinga, California. In this capacity, we are concerned that the appropriate regional issues be identified and addressed to understand what risk may be posed by naturally occurring asbestos of the New Idria Formation as opposed to risks generated by man's (anthropogenic) activities in the area. We are committed to working with you to bring the significant issues into focus to begin to understand what is an appropriate course of action for the regional asbestos situation around Coalinga. We suggest this course of action ultimately be developed into a Mountain Asbestos Plan (MAP) that will address concerns of land managers, regulatory agencies, private parties and other concerned entities.

As a sound beginning to developing the MAP, I was delighted to hear that BLM had undertaken a program to digitize 7-1/2 minute U.S. Geological Survey contour maps utilizing the standard format of the Geographic Information System (GIS). We concur with your decision to use GIS digitized maps as a tool for understanding land use patterns, historical land development, and the relative areas involved in any one anthropogenic activity. Analysis of land use would be very useful in understanding natural versus anthropogenic generated risks.

We have discussed internally what overlays might be useful in developing the MAP for the region and have grouped our suggestions into five overlay groupings. We believe that these groups would provide a basis for beginning to understand what sources of risk exist in the area, the relative size of each source, and lastly the

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likely responsible party associated with each source area. The MAP study area is assumed to be the same area that was delineated in the 1987 Woodward Clyde Consultants' report *Inventory of Potential Asbestos Sources in the New Idria-Coalinga Study Region*. The groupings are as follows:

1. An overlay illustrating the New Idria Formation outcrop within the study area. This overlay would provide a basis for understanding the magnitude of naturally occurring asbestos within the MAP study area.
2. Disturbed areas within the MAP study area delineated to quantify the magnitude of asbestos contributing area for each type of disturbed area. The disturbed areas would likely need to be referenced according to activity type. These may include:
 - o asbestos mine sites
 - o asbestos fill sites
 - o other mine sites
 - o exploration sites
 - o roadways

Delineation of these disturbed areas would allow efficient calculation of areas represented by each activity type. These areas could be used to begin to understand the relative contribution to regional risk posed by each activity and the proportion to which each might be yielding asbestos for either airborne or waterborne transport. These overlays would likely need to be prepared for each five-year period starting in 1955.

3. Many areas within the New Idria Formation are naturally unvegetated. These areas would be more readily eroded than vegetated areas, and hence should be mapped as a separate overlay to delineate naturally occurring areas with a greater potential for erosion and subsequent transport of asbestos.
4. An overlay of drainage basins within the MAP study area would be very useful in understanding potential for asbestos transport in surface waters and the ultimate destination of such asbestos transport. We suggest that delineation of drainage basins, including first, second, third, and larger order streams, be completed to facilitate characterizing the basin geometries required for hydraulic analyses of erodibility and runoff for each basin type. Such analysis may allow us to better understand the likely contribution of asbestos from each watershed.

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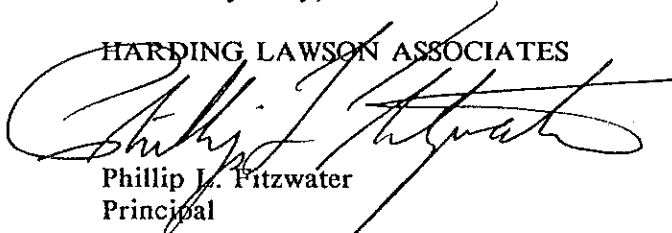
5. The final overlay would be related to ownership or access rights to lands within the study area. We would suggest overlays be prepared for ownership, leases, and mineral rights, at a minimum, and would suggest that these overlays be prepared at five-year intervals or more frequently if a large degree of activity is encountered in any five-year period.

We understand that these recommendations do not encompass all that can be accomplished utilizing the GIS mapping system, but we feel that, beginning with this framework, we could develop a clearer understanding of the major issues confronting us in developing an implementable MAP that will remediate unacceptable risks that have been generated by man's activities within the study area. We are committed to work with you to bring the major central issues involved in the MAP into focus so that an appropriate and realistic remedial plan can be developed and applied within the study area.

I will be calling you in the near future to discuss how we might work together to define central issues for the MAP and to further explore how we might share resources to our mutual benefit. If you have any questions in the meantime, please feel free to contact me.

Yours very truly,

HARDING LAWSON ASSOCIATES



Phillip L. Fitzwater
Principal

PLF/trf/G6290-CT



U.S. Department of Justice

MNS:JSR
DJ# 90-11-2-287

Washington, D.C. 20530

October 24, 1988

Mr. Bernie Hyde
Chief, Hazardous Materials & Program
Management Staff
Bureau of Land Management
U. S. Department of the Interior
18th & C Streets, N.W.
Washington, D.C. 20240

Re: Atlas Asbestos

Dear Bernie:

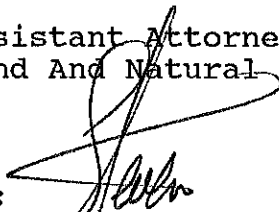
Enclosed per your request are copies of the model DOD and DOE Inter-Agency Agreements with EPA; the Record of Decision issued by EPA at the "French Limited" Superfund Site in Crosby, Texas; and a cost sharing agreement between the U. S. Navy and a RP for the Pioneer Sand Superfund Site in Pensacola, Florida.

Please let me know if I ^{can} be of further help.

Sincerely yours,

Assistant Attorney General
Land And Natural Resources Division

By:


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Environmental Defense Section
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