



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
 California State Office
 2800 Cottage Way, Room E-2845
 Sacramento, California 95825-1889



IN REPLY REFER TO:

1703
 CA-932.7

OCT 2 1991

Memorandum

To: Clementine Berger, Attorney
 Office of the Solicitor
 Pacific Southwest Region, Sacramento

From: State Director

Subject: Atlas Mine Superfund Site

Pursuant to your recent request on the Bureau's past costs at the subject site, attached are our best estimates. According to these estimates, the Bureau has spent a total of \$ 925,681 at the Atlas Asbestos Mine from 1977 to 1991. For some of the cost data (contracted studies, contracted construction actions, and personal protection equipment) we have specific figures. However, for time spent by field and office personnel, we can only provide a conservative estimate based on conversations with field and State Office personnel. It would be difficult to arrive at precise data on expended effort (Work Months) and average salary figures for each and every BLM person that was or is involved with the Atlas Mine Site issue.

Copies of all the produced reports can be made available if you need them. They can also be found in the Atlas Mine NPL Briefing Book. Contract and cost data for the two reports done by the University of California, Berkeley, 1978-1979, are no longer available. We were able to talk with one of the principal authors, through his secretary, and confirmed the cost was \$9,985. These reports were prepared mainly in response to the Bureau's concern on airborne asbestos in the Clear Creek Management Area and the possible health risks to the public and Bureau employees. At that same time OSHA revised its allowable airborne asbestos limits downward to two fibers, five micrometers or longer in length, per cubic centimeter of air. Another possible reason BLM decided to begin collecting some baseline data on airborne asbestos was the increase in legal activities associated with the Johns-Manville Coalinga Asbestos Mill.

The 1988 Field Observations Report done by the Bureau's Service Center was a direct result of EPA's RI/FS effort.

Medical monitoring of Bureau employees who work or have worked in the Clear Creek Management Area was a result of OSHA's airborne asbestos limits and the results of air sampling in the area.

The NUS Corporation open contract is being used by the Bureau on a continuing basis to examine technical and procedural issues at the Atlas Asbestos Mine NPL Site. The two tasks associated with this contract are a direct result of EPA's request for information. The Bureau doesn't have the technical expertise in several of the areas that EPA is requesting information. Copies of Task 8 and 10b of the NUS Corporation contract are included as the attachment. They provide a short description on the purpose of each task that was done or in the process of being done. The cost data for these contracts

was obtained from the Service Center over the telephone. If you need copies of this information, we can request the Service Center provide hard copies.

The construction of the Clear Creek Administration Site was motivated by both OSHA and EPA requirements. The Administration Site includes a vehicle wash facility. The increased patrolling of the Atlas Mine Site required a facility close to the mine to carry out maintenance of public access control structures, including the fence, signs, and gates. In addition, all BLM vehicles used on the mine site need to be decontaminated prior to leaving the Clear Creek area.

The fencing was a direct EPA requested action to exclude public access to the mine site.

Because of EPA's requirement to exclude the public from the Atlas Mine Site, additional vehicles were assigned for use in patrolling the mine area.

All of the personal protective equipment and related supplies, and training are required by EPA and OSHA regulations.

Calculating the total Work Month (WM) dollars spent at the Atlas Mine Site since 1977, required discussions with the field and office personnel who were and are still involved at the site. As noted earlier in this letter, this information is subjective, but it is our best estimate.

If you need additional information or assistance, please contact Mr. Dick Johnson or Mr. Richard Forester of my staff. They can be reached at extension 4725.

Richard F. Johnson
ACTING STATE DIRECTOR

Attachment
As Stated

cc: WO (750), Room 302 LS
DM, Bakersfield
AM, Hollister

BUREAU OF LAND MANAGEMENT PAST COSTS
AT THE ATLAS ASBESTOS MINE NPL SITE

CONTRACTED STUDIES

1978 - Report on Asbestos in Clear Creek Recreation Area

In mid-1977, the Bureau of Land Management requested analysis of a sample of rock from the Clear Creek area in San Benito County, California, to determine if it contained chrysotile asbestos which might be a hazard to health. The area was known to be one where the predominant mineral was serpentine. When the preliminary analysis confirmed the presence of chrysotile, a study was designed to determine if recreational use might result in hazardous concentrations of airborne chrysotile, and also if there were asbestos fibers in the water of the area.

During the spring and summer of 1978, a joint study was carried out by the School of Public Health and the Department of Geology and Geophysics of the University of California, Berkeley, supported by the Bureau of Land Management. The objectives were to collect samples of air and water in the Clear Creek area, to determine if asbestos was present, and if so, the concentrations and size characteristics that were present.

1979 - Report of Seasonal Variations in Asbestos Aerosols in the Clear Creek Recreational Area

This report documents further investigations into the exposures of visitors to the Clear Creek Recreational Area to natural asbestos which comprises the bulk of soil in this area. The initial study, Report on Asbestos in Clear Creek Recreation Area, examined exposures at only one point in time. This study was done to span a wider range of seasonal conditions. In particular it was hypothesized that rainfall and subsequent moisture in the soil would be significant sources of seasonal variations in airborne fiber concentrations generated by motorcycle riders. Further data were desired on other users of the area and on the other sources and movement of the asbestos dust aerosols in the area.

Cost for both Reports \$ 9,985

1988 - Field Observations Report - Atlas Asbestos Mine Complex

A field trip was made June 13-16, 1988, by BLM Service Center personnel involved in the technical review of the Atlas Asbestos mine Remedial Investigation and Feasibility Study (RI/FS), Clear Creek Management Area. The purpose of the trip was to gain additional knowledge of the area and, if necessary, gather physical resource (soil and water) data in support of the technical review for the EPA generated documents related to the Atlas Asbestos Mine RI/FS.

Cost \$ 2,000

1978 - Present - Medical Monitoring Contract with U.S. Public Health

Two employees who have work responsibilities at the Atlas Mine Site receive medical surveillance monitoring each year at a cost of \$ 250 per person per year.

Cost to date \$ 6,500

1989 - ~~Brown and Caldwell (subcontractor to NUS)~~
~~Brown and Caldwell were subcontracted by NUS to provide a technical review of the BLM's Atlas Mine Site air sampling techniques and data and the health and safety plan. This contract lasted only a few months before it was terminated by NUS at the request of the Bureau.~~

~~Cost \$ 7,016~~

1989 - Present - NUS Corporation (general Bureauwide work contract)
Contract # AA852-CT9-18

Task 8 - (see attached)
Task 10b - (see attached)

Cost to date \$ 97,083

CONSTRUCTION ACTIVITIES

1988 - Development of BLM Clear Creek Administration Site and Decontamination Facility. The Bureau of Land Management initiated the development of an administration and decontamination facility in the Clear Creek area. A small parcel of BLM land was leveled to accommodate a large mobile trailer for the administration building, a concrete pad was poured and a maintenance building erected, a shower trailer moved onto a concrete pad, car wash facilities constructed, a

water well drilled and utilities installed. The Bureau is mandated to manage the public lands under its regulatory authority for the public's interest. Since the Atlas Mine Site is a "Superfund" site and there may be some concern regarding the public's health and safety in the area, considerable time and expense has been expended by the Bureau in providing field patrols into and around the Atlas Mine Site. The Administration Site provides the necessary services to allow the Bureau to maintain a very visible presence in the area. We estimate, based on current Bureau activities in the area, thirty percent of the site's use can be attributed to work related activities at the Atlas Mine Site. To date a total of \$144,000 have been spent constructing and operating the Administration Site. The prorated costs for the Atlas Mine Site are \$ 47,520.

Cost to date \$ 47,520

1977 - Present - Signs (printing and posting)
Asbestos hazard warning signs were printed and posted around the Atlas Mine Site. Vandalized signs are repaired or replaced as they are found.
Cost to date \$ 7,250

1989 - Fence Construction and Maintenance
In April 1989, a contract (# YA551-CT8-240068) was let to construct a high tensile fence around a portion of the Atlas Asbestos Mine to prevent public access to the mine site. In addition, barriers, including earthen berms and field fencing were placed in appropriate locations to prevent public access to the mine site.
Cost \$ 185,792

The fence has required periodic maintenance to keep the wires tight and to remove any tree limbs or vegetation that may have fallen onto the fence.
Cost to date \$ 1,500

EQUIPMENT AND SUPPLIES

1977 - Present
Vehicles - Two vehicles are designated for use in the Clear Creek area. Prior to 1987, 6 trips were taken to the Atlas Mine Site per year. After 1987, twelve trips were made to the Atlas Mine Site per year. As noted earlier, Atlas Mine Site inspections account for about one-third of the total BLM field activities in this area. Since 1977, vehicle maintenance has averaged about \$ 6,000 per year. In calculating the total vehicle costs, we use the following:
Cost of vehicles - \$ 30,000, including two way radios

and the necessary equipment for rough terrain use, plus the average cost of vehicle maintenance of \$ 6,000 per year over 14 years = \$ 114,000. The prorated costs for Atlas Mine Site are estimated to be \$ 37,620.

Cost \$ 37,620

Personal Protective Equipment (PPE) - The Fence construction contract required BLM personnel to use personal protection equipment while on the Atlas Mine Site per OSHA regulations. BLM purchased the following PPE:

2	HEPA vacuums	\$ 1,000 each	\$ 2,000
4	Half-mask respirators	\$ 40 each	\$ 160
1	Full-face respirator		\$ 250
2	Powered air respirators	\$ 425 each	\$ 850
2	Air samplers	\$ 925 each	\$ 1,850
			\$ 5,110

Average yearly costs for PPE supplies and maintenance of equipment.

Commercial laundry for coveralls and rags. 56 pair are used each year	\$ 1,500
100 Air filter cassettes per year	\$ 150
100 Lab analyses of filters	\$ 2,500
Air sampler maintenance each year	\$ 285
	\$ 4,435
\$ 4,435 multiplied by three years =	\$13,305

Health and Safety Training - Because EPA has determined that asbestos is a health risk, Bureau employees who have field responsibilities in the Atlas Mine Site area must complete OSHA health and safety training. A staff of two are required to attend to patrolling and field work at the Atlas Mine Site. Appropriate training included the following:

OSHA 40 hour training course	\$ 1,000 each	\$ 2,000
OSHA annual refresher course	\$ 500 each	\$ 1,000

The annual refresher course has been taken annually since 1988.

Cost to date \$ 5,000

EMPLOYEE SALARIES

1977- Present - We estimate that 100 Work Months(WM) of time have been spent by Bureau personnel in patrolling, collecting field data, posting signs, preparing reports and attending various Atlas Mine Site meetings since 1977. Using the average of \$ 2,000 per WM, we estimate \$ 200,000 in Bureau salaries have been spent by field personnel during the last 14 years at the Atlas Mine

Site. Another 100 WMs was spent by Bureau management and technical personnel on review of documents, attending management level meetings and writing reports. Using the average of \$ 3,000 per WM, we estimate another \$ 300,000 of Bureau salaries was spent during the same time period.

Cost to date \$ 500,000

The Bureau has spent (from 1977 to date) a total of \$ 925,681 of time, effort and materials at the Atlas Asbestos Mine NPL Site.

1. CONTRACT ID CODE		PAGE OF PAGES	
2. AMENDMENT/MODIFICATION NO. 9		3. EFFECTIVE DATE 8-23-89	4. REQUISITION/PURCHASE REQ. NO. 509-PR9-2
5. PROJECT NO. (If applicable)		6. ISSUED BY U.S. Department of Energy Bureau of Land Management 18th & C Streets, N.W., Room 2444 Washington, D.C. 20240	
7. ADMINISTERED BY (If other than Item 6) Lynne C. Sendejo Contracting Officer		CODE 852	

8. NAME AND ADDRESS OF CONTRACTOR (No., street, county, State and ZIP Code) NUS Corporation 910 Clopper Road P.O. Box 6032 Gaithersburg, Maryland 20877-0962		(Y)	9A. AMENDMENT OF SOLICITATION NO.
CODE			9B. DATED (SEE ITEM 11)
FACILITY CODE		XX	10A. MODIFICATION OF CONTRACT/ORDER NO. AA852-CT9-18
			10B. DATED (SEE ITEM 13) April 28, 1989

11. THIS ITEM ONLY APPLIES TO AMENDMENTS OF SOLICITATIONS

The above numbered solicitation is amended as set forth in Item 14. The hour and date specified for receipt of Offers is extended, is not extended.

Offers must acknowledge receipt of this amendment prior to the hour and date specified in the solicitation or as amended, by one of the following methods:

(a) By completing Items 8 and 15, and returning _____ copies of the amendment; (b) By acknowledging receipt of this amendment on each copy of the offer submitted; or (c) By separate letter or telegram which includes a reference to the solicitation and amendment numbers. FAILURE OF YOUR ACKNOWLEDGMENT TO BE RECEIVED AT THE PLACE DESIGNATED FOR THE RECEIPT OF OFFERS PRIOR TO THE HOUR AND DATE SPECIFIED MAY RESULT IN REJECTION OF YOUR OFFER. If by virtue of this amendment you desire to change an offer already submitted, such change may be made by telegram or letter, provided each telegram or letter makes reference to the solicitation and this amendment, and is received prior to the opening hour and date specified.

12. ACCOUNTING AND APPROPRIATION DATA (If required)

13. THIS ITEM APPLIES ONLY TO MODIFICATIONS OF CONTRACTS/ORDERS, IT MODIFIES THE CONTRACT/ORDER NO. AS DESCRIBED IN ITEM 14.

(Y) THIS CHANGE ORDER IS ISSUED PURSUANT TO: (Specify authority) THE CHANGES SET FORTH IN ITEM 14 ARE MADE IN THE CONTRACT ORDER NO. IN ITEM 10A.
52,243-02

X B. THE ABOVE NUMBERED CONTRACT/ORDER IS MODIFIED TO REFLECT THE ADMINISTRATIVE CHANGES (such as changes in paying office, appropriation data, etc.) SET FORTH IN ITEM 14, PURSUANT TO THE AUTHORITY OF FAR 43.103(b).

C. THIS SUPPLEMENTAL AGREEMENT IS ENTERED INTO PURSUANT TO AUTHORITY OF:

D. OTHER (Specify type of modification and authority)

E. IMPORTANT: Contractor is not, is required to sign this document and return _____ copies to the issuing office.

14. DESCRIPTION OF AMENDMENT/MODIFICATION (Organized by UCF section headings, including solicitation/contract subject matter where feasible.)

- The purposes of this modification are to:
1. Transmit a revised Statement of Work for Task 8, Atlas Asbestos Technical Support.
 2. Permit the contractor to forward a revised cost proposal for the work to be performed under Task 8 to the BLM office above. The proposal is due by September 4, 1989.
 3. Detailed Statement of Work for revised Task 8 is attached.

END OF MODIFICATION

Except as provided herein, all terms and conditions of the document referenced in Item 9A or 10A, as heretofore changed, remains unchanged and in full force and effect.

15A. NAME AND TITLE OF SIGNER (Type or print)		16A. NAME AND TITLE OF CONTRACTING OFFICER (Type or print)	
		Lynne C. Sendejo, WO-205	
15B. CONTRACTOR/OFFEROR	15C. DATE SIGNED	16B. UNITED STATES OF AMERICA <i>Lynne C. Sendejo</i> (Signature of Contracting Officer)	16C. DATE SIGNED
(Signature of person authorized to sign)			

TASK ORDER
TASK 8

TASK 8. The contractor shall provide all necessary technical services and support requested by Task Order to the BLM California State Office and to the BLM Headquarters in the management of the Atlas Asbestos Mine Site.

1. Background. See pages marked "Appendix 1" through "Appendix 6" (attached).

2. Role of the Contractor. The role of the Contractor under this Task Order is that of consultant to the BLM Project Inspector, the BLM Headquarters COR and the Contracting Officer. The Contractor shall speak to the Bureau in all matters regarding the Atlas Asbestos Mine Site. The Contractor has no authority to commit the Bureau or the United States in any way.

3. Work Authorized Under This Task Order. The Contractor is hereby authorized and directed to carry out the following work:

a. No later than the week of July 10, 1989 the Contractor shall visit the Bureau of Land Management office in Sacramento, California and meet with the BLM State Director, or his designees, as well as the BLM's Project Inspector for this Task Order, to become familiar with BLM, other Federal, State and local agencies and private firm activities associated with the Atlas Asbestos Mine Site RI/FS and the BLM's specific requirements for this Task Order including a discussion and further clarification of the activities of the Contractor regarding the BLM's requirements for the Contractor to provide assistance to the Hollister Resource Area Office as it develops a soil moisture/air sampling strategy and a revegetation/erosion control plan for the Atlas Mine Site.

Visit the Bureau of Land Management Office at Bakersfield, California and meet with the District Manager, or his designees, and the BLM's Project Inspector assigned to this Task Order. The purpose of this meeting will be to further familiarize the Contractor with background of the Atlas Asbestos RI/FS, the work done by the EPA, significant dates of the EPA's ongoing schedule for completing the RI/FS and Record of Decision and the specific needs of the BLM in the management of its work at the site.

Visit the Bureau of Land Management Area Office at Hollister, California and meet with the Area Manager to acquaint him with the nature and extent of the Contractor's work as requested by the State and District Offices, and to determine what, if any, additional services the Area Manager thinks is required.

The Task Order elements listed below are in order of priority.

b. The Contractor shall review the following documents related to the Atlas Mine, and/or Areawide study: (see attachment labeled "Appendix 7"). This review shall be for the purpose of becoming more familiar with the conditions found at the site and surrounding area as well as the results of studies which have been prepared in the past.

c. The Contractor shall serve in the capacity of an expert witness on three (3) occasions at public or private meetings to be held in either Sacramento, San Francisco or Hollister, California in matters connected to the Atlas project, if so requested by the BLM Project Inspector.

d. The Contractor is to attend approximately three (3) meetings and conferences as the Bureau's technical expert upon five (5) days notice of said meetings. The purpose of the Contractor's attendance at these meetings or conferences is to consult with the BLM personnel regarding the status of work associated with this task order and to provide an update of the progress being made on the Contractor's work assignments. The BLM shall either videotape or record these meetings for the purpose of producing a record of the proceeding.

e. Evaluate Health and Safety Plan. The Technical Support contractor shall review BLM's Health and Safety Plan for the following areas of concern:

- 1) Review the plan for adequacy of the air monitoring plan for employees and compliance with both OSHA 8 hour TWA and 0.5 hour excursion limit for asbestos and nickel, chromium and cobalt.
- 2) Review the plan for adequacy of air monitoring database and specific work activities for employee exposure documentation of asbestos, and other fugitive dusts containing nickel, chromium and cobalt.
- 3) Review BLM generic contractual language for adequacy of contract provisions concerning health and safety procedures for BLM contractors.
- 4) The EPA Risk Assessment shall be reviewed in context for the following elements 3.e. 1-3 above. The Contractor shall recommend any improvements or suggest changes to BLM's Health and Safety Plan.

This review shall be completed by September 29, 1989. Both a hard copy and an IBM Wordperfect 5.0 floppy disk shall be provided.

- f. The Contractor shall review the preliminary draft and the draft EPA Remedial Investigation and Feasibility Study (RI/FS) on Atlas Mine. The Contractor shall also review the Levine-Fricke Remedial Investigation and Feasibility Study (RI/FS) on the Johns-Manville Mine. These reviews shall address the following elements;
- 1) Determine the technical adequacy of the above referenced reports; specifically reviewing the scientific soundness to support the findings, recommendations and conclusions. The Contractor shall review BLM's comments on the EPA draft RI/FS documents and determine if any technical omissions exist.
 - 2) Upon receipt by BLM of the EPA final draft RI/FS (estimated October 1989) this document is to receive the same review as in 3.f.1 above. This review is to be completed by September 29, 1989 for 3f.1 and 3f.2 will be completed 30 days after receipt to BLM of final draft of Atlas RI/FS estimated approximately mid-October, 1989. The format for the review is previously described in task element 3a.
- g. Develop plan of study for revegetation/erosion control. This plan is to address the alternatives for asbestos soil and tailings stabilization for both disturbed and natural barren slopes. This plan will be developed for the existing 8 foot high asbestos berm on the Atlas Mine and will include measures such as reseeding, soil amendments, soil tackifiers and contouring, etc.)

This task element is to be completed by October 15, 1989 so that a early fall application of proposed and recommended treatment may be initiated.

ATLAS ASBESTOS MINE

APPENDI

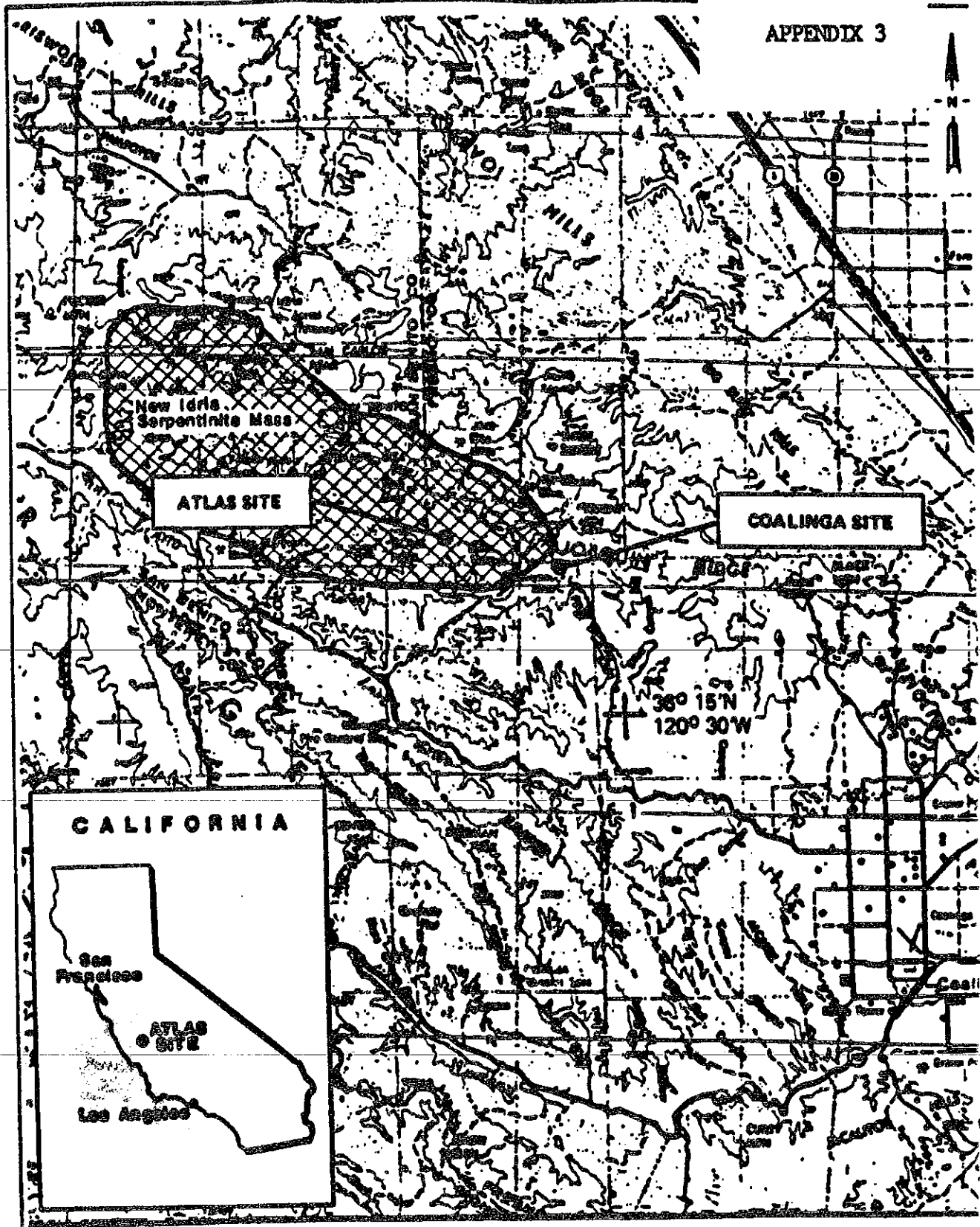
- Atlas site developed under the purview of the 1872 Minin Law.
- The Atlas Mine operation involved approximately 185 lode mining claims (inclusive of two 5-acre mill-site claims). Mineral surveys completed in 1961 and 1965.
- Mill-site claims are patented private land held by Wheeler Properties, Inc.
- Total area of operations 140-acres.
- Wheeler in default due to non-payment of taxes.
- Operations (mining and milling) occurred from 1967 to 1979.
- Facility first owned and operated by Vinnell Mining and Minerals Corporation (1967 - 1974).
- Facilities sold to Wheeler Properties in 1974.
- Wheeler continued operations until 1979. They filed bankruptcy shortly thereafter.
- Major features of the site include:
 - 1.) open-pit mine
 - 2.) ore stockpile area
 - 3.) mill facilities
 - 4.) 17-acre process waste tailings area
 - 5.) warehouse and distribution facility for milled asbestos was located in Coalinga.
- September 1983: EPA proposed site for National Priorities List (NPL).
- September 1984: site finalized on NPL and authorized to use Super Fund to investigate and clean up.

BUREAU ACTIONS RELATING TO THE SITE:

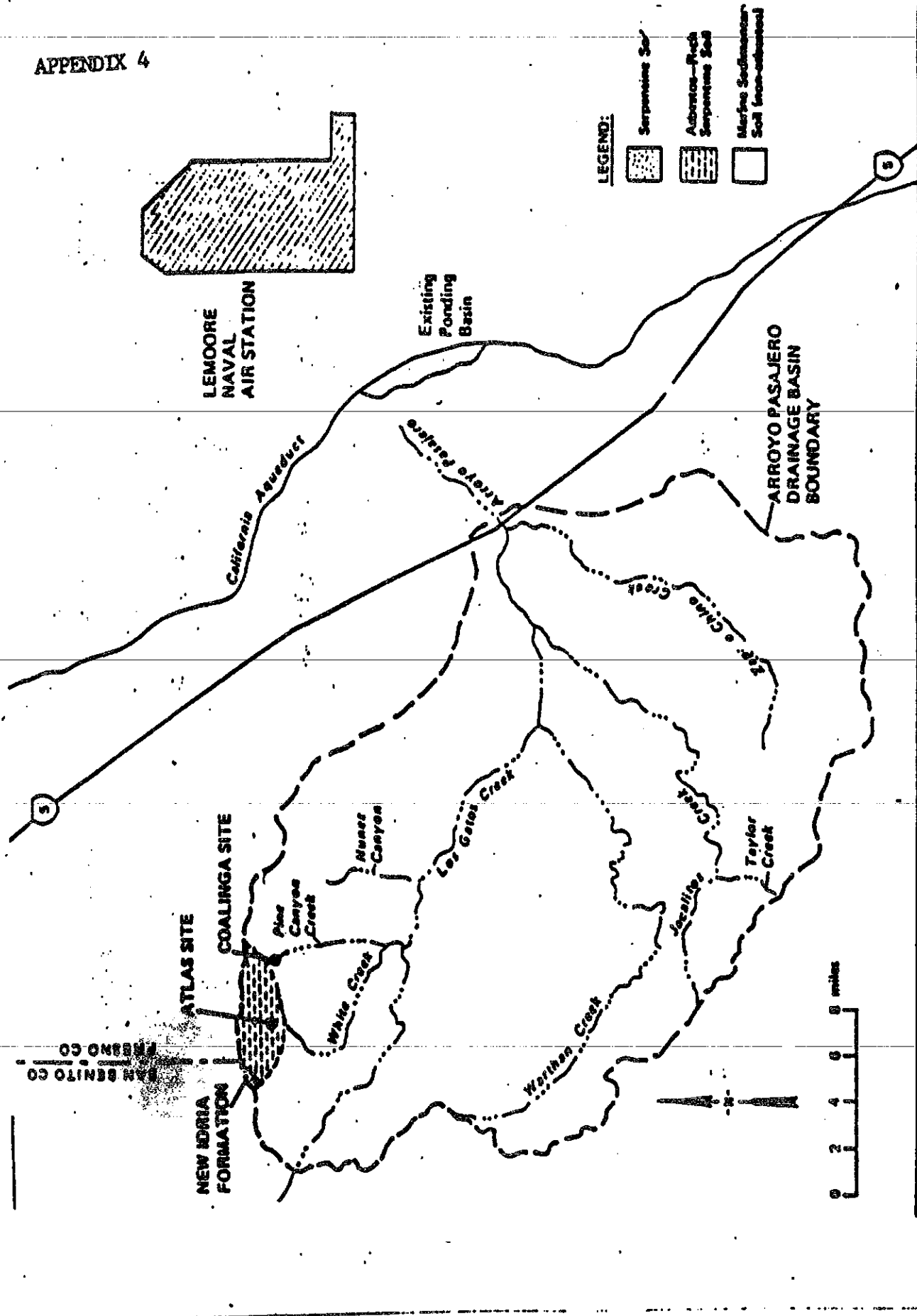
- 1978 contract w/U C Berkeley for asbestos study.
- 1981 development of an asbestos information pamphlet and a statement of BLM's position on use in the asbestos area. Also implementation of BLM's hazard awareness program.

BUREAU ACTIONS RELATING TO THE SITE:
(CONTINUED)

- ORV designations completed in 1982, Atlas area designated as closed to ORVs.
- 1983 development of Clear Creek Management Area map/pamphlet.
- August 6, 1984 Hollister RMP ROD designated the serpentine area as an ACEC to protect important watershed values, significant sensitive plant habitat and because of asbestos related health hazards.
- June 2, 1986 final Clear Creek Management Plan Decision Record. Embodied specific actions for resource management and asbestos hazard mitigation measures.
- 1986 signing and patrol of the area.
- 1986 recruitment of two Park Rangers for the Clear Creek Area. Primary duties, visitor contact and Management Plan project implementation. A dominant function is to inform the public of the asbestos hazard in the area and recommend appropriate personal protective measures.
- February, 1988 development of an action plan for land use plan decision implementation specific to the Atlas site.
- May, 1988 contract preparation for site specific mitigation measures.
- August, 1988 contract advertised for site security measures, fence, berm and signs.
- March, 1989 contract completed for site security, initiate erosion control plan for surface disturbance of onsite berm construction.
- June-July, 1989 Anticipated implementation of onsite erosion controls
- September-October, 1989 Anticipated EPA Record of Decision on Atlas Remedial Actions.



Project No. 238-P81	Atlas Site	PROJECT VICINITY MAP	Figur 1-1
	Woodward-Clyde Consultants		



LEGEND:

- Serpentine Soil
- Alluvium-rich Serpentine Soil
- Marine Sedimentary Soil (non-saturated)

Figure 1.2. ARROYO PASAJERO DRAINAGE BASIN



Topographic Source: U.S.G.S. Quadrangles



Project No. 238-F81	Atlas Site	GENERAL SITE MAP	Figur 1-2
	Woodward-Clyde Consultants		

Selected References and Reports for the Atlas Mine

California Serpentine: Flora, Vegetation, Geology, Soils Management Problems, Kruckeberg, 180 pages.

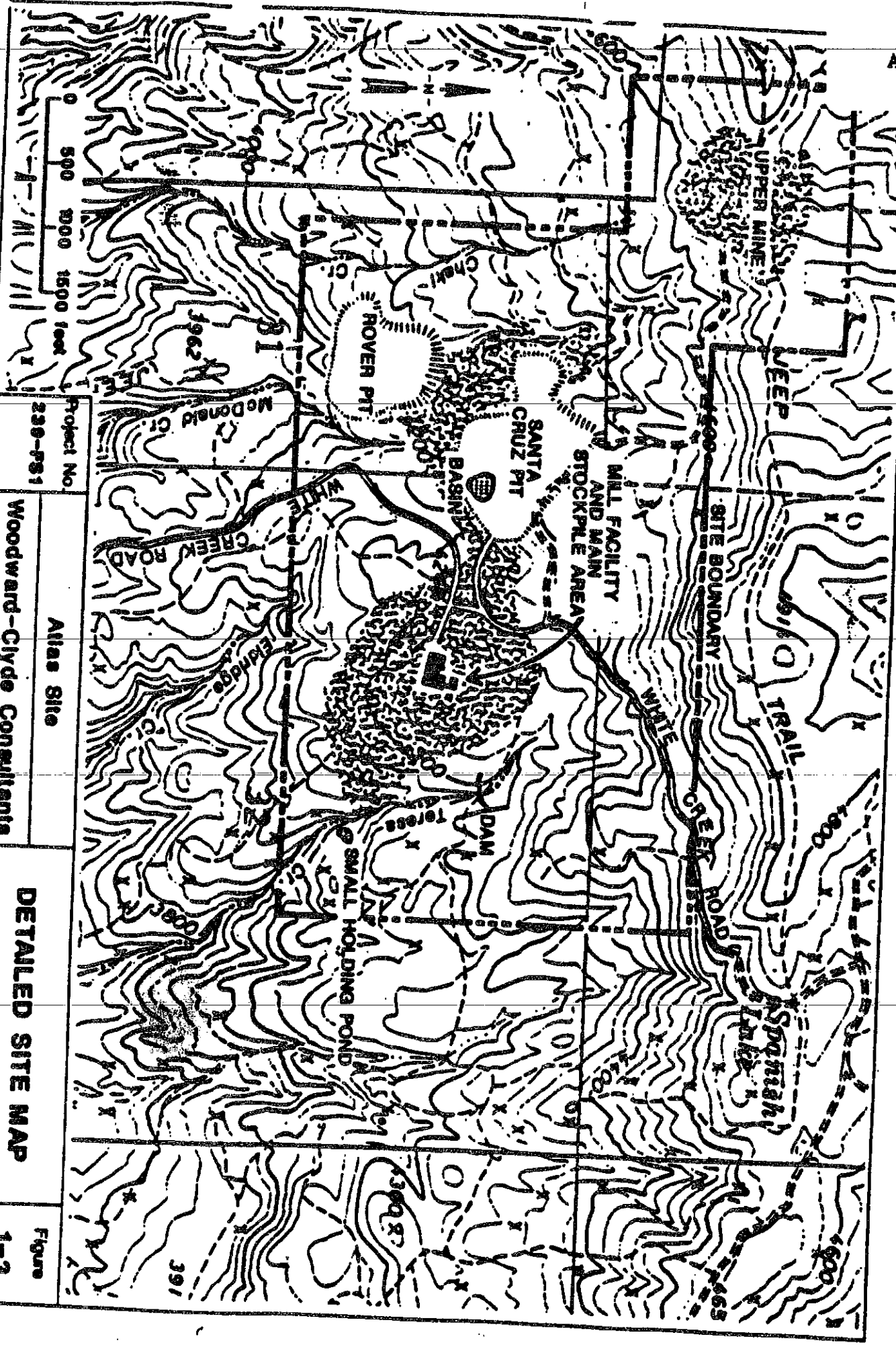
California Geology, July, 1988, Asbestos in the Western Sa Joaquin Valley, 5 pages.

Levine and Fricke, Remedial Investigation for the Coalinga Asbestos Mill Site Fresno County, California, 1988, 2 volu and 7 appendices, approx. 2000 pages including maps, photo tables.

Popendorf, W.J., Wenk, H.R., Report of the Seasonal Variat in Asbestos Aerosols in the Clear Creek Recreational Area, 1979, 46 pages.

Woodward & Clyde Consultants, Regional Study of Mining Disturbances and Exploration-Related Disturbances of Asbestos-Bearing Material in the New Idria-Coalinga-Table Mountain Study Region, 1989, approx. 100 pages including tables, maps and photos.

Topographic Source: U.S.G.S. Quadrangles



Project No. 238-PS1

Woodward-Clyde Consultants

DETAILED SITE MAP

Figure 1-3

Alias Site

TASK ORDER
Task 10-B

Contact No. AA852-079-18
Technical Support for Atlas Asbestos Mine Site

The technical support contractor, NUS Corporation, is authorized and directed to carry out the following work:

A. Review and become familiar with the existing Clear Creek Management Plan (1985), keeping in mind EPA's direction to BLM that the revised plan must minimize airborne asbestos emissions and minimize the threat to public health.

B. Review EPA's Risk Assessment taking special note of the air monitoring data that was used to develop it.

C. Review all pertinent air monitoring data including EPA's, BLM's, Levine-Fricke's, KCAC's and any others provided by BLM. The technical support contractor shall determine from this review whether the current data base is sufficient to prepare a risk assessment for the management area which can predict risk for specific locations within the management area, specific types of land uses and specific climatic and soil moisture conditions. If the current data base is not sufficient to prepare such a risk assessment, the technical support contractor shall develop a study plan to collect additional air monitoring data. This plan would provide specific instructions to BLM on the frequency, locations and methods of air sample analysis that would be necessary. Instructions would also be provided on how to monitor specific land uses under various climatic and soil moisture conditions. The technical support contractor shall submit a report on its conclusions regarding the adequacy of the existing data base and a study plan for additional monitoring, if determined necessary.

D. Assist, as requested, the Atlas Project Manager with preparing a written request to EPA for assistance in designing and conducting a risk assessment for the Clear Creek Management Area. The technical support contractor shall assist the BLM and the EPA in the design of the risk assessment.

E. Review the transcripts of the public meetings held in Coalinga and Sunnyvale, CA. Analyze the methods used by EPA to explain the information and analyze the degree of understanding and acceptance of the information by the public. Review methods of risk communication and recommend methods, including visual, to prepare and present information on the plan revision process and the results of the risk assessment for the management area at future public meetings. Deliver the results to the Atlas Project Manager.