

~~W0707 - Rm. 3529~~

CRD Atlas Atlas
mine

SEP 05 1989

1703
CA-930

Memorandum

To: State Director
From: Deputy State Director, Lands & Renewable Resources
Subject: Coordination Meeting with EPA, Atlas Mine, 8/31/89

On Thursday, August 31, 1989, I met with EPA in San Francisco to discuss our comments to their preliminary draft RI/FS and risk analysis. Bob Beehler and Tim Moore, Hollister RA also attended. EPA was represented by Greg Baker and Dan Meer. The agenda is attached.

Our discussions centered around interpreting and elaborating on the written comments we had previously provided to EPA. The meeting was helpful in that it continued our dialogue with EPA staff and brought us both up to date on current events.

While EPA is not redoing their models used for their air and water analysis, they are running what they call "sensitivity checks" by using various levels of information to see what the results will show. For example, they are varying the erosion potential factors, and the percent chrysotile in soils and tailings to see the resulting variance. They are not, however, planning to revise the models or change their basic assumptions.

Tim and Bob asked for a better exchange of technical data from EPA, at the same time recognizing some information may be privileged and not releasable.

We discussed the 9 items on p. 2 of the agenda (EPA's Preliminary Proposed Plan Outline for the Atlas Mine Site). We commented as follows:

1. A clear definition of the "site" needs to be stated. It is confusing whether EPA intends the "site" to be the Atlas mine site or some broader area.
 2. We commented that patrolling is now occurring, and that what EPA could consider are other methods of monitoring, including aerial and satellite observations, and possible the use of sensors.
 3. We commented that paving or sealing of the road through the Atlas mine site may not be very effective, considering all the other uncovered roads and trails in the regional area.
 4. We discussed the remediation plan developed by Vinnell/Atlas last year, and suggested that EPA include in their plan that up-front studies must be done before clearly deciding that regrading would be effective. The effectiveness of regrading, and the possibility of safety problems developing should be determined by determining the stability of the tailings.
 5. We agreed that some form of run-on controls would be needed, and acknowledged that the remediation plan already developed by Vinnell/Atlas included run-off control.
 6. We discussed the need for requiring retention dams to be clearly explained; whether on-site or off-site. We commented that EPA ought to include any such discussion based on an area-wide perspective.
-
7. Bob and Tim acknowledged the revegetation work now being done by U.C. Riverside and CalPoly.
 8. Regarding the closing of the Clear Creek Management Area to OHV use I stated that this is a key point that you and McGovern would want to discuss at a face-to-face meeting prior to EPA releasing the draft RI/FS for public comment.
 9. We suggested to EPA that this draft plan recommend a preferred ~~method of disposal of the mill building and equipment - burial~~ on-site or transportation off-site.

We also suggested EPA consider a plan element addressing monitoring the effectiveness of each of the planning elements. We made it clear to Greg that we would not be happy with a monitoring requirement that went along ad-infinitum. We also suggested they may want to consider a plan element addressing erosion control on the roads and trails in the area.

We did not discuss who would undertake these plan actions. I told Greg I would follow up with our WO to see if there was anything new regarding USDI/BLM's position on responsibility.

Greg discussed their new schedule for the draft RI/FS:

- * they now plan to distribute the Draft RI/FS about 12/1/89.
- * there will be a minimum of 30 days for public review, but this could be extended to 60 days if requested.
- * there would probably be one public hearing, at Coalinga.
- * they plan to issue the ROD by the end of 6/90.

le/ RICHARD F. JOHNSON

Attachment
As stated

cc: DM, Bakersfield
AM, Hollister
WO-707, Room 3529, MIB
EPA, Greg Baker
Branch of Biological Resources
