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IN REPLY REFER TO:

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(CA-932.7)



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

CALIFORNIA STATE OFFICE

2800 Cottage Way
Sacramento, California 95825

SEP 12 1985

John Wise
Deputy Regional Administrator
U.S. EPA
215 Fremont Street
San Francisco, CA

Dear Mr. Wise:

In the past we have had some concerns as to how coordination between our two agencies was evolving, specifically as it related to the "Atlas Mine" National Priority List site. It had been our hope to continue to work closely with your staff to evaluate the incoming data in the Remedial Investigation/Feasibility Study and determine the level of concern.

Recently, we were notified by our Washington Office that EPA headquarters had received an A-106 "Federal Facilities Pollution" Report from your Region concerning the mine site with pollution control measures recommended that were projected to cost \$10 million. Since that notification my staff has spent a considerable amount of time trying to find out exactly what your staff sent forward and why.

Attached are two documents, the first being a letter from the Toxics Division to the Air Division notifying them of a potential violation of the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) and the second is the form sent by your Federal Facilities group to your Washington Office.

The form leaves us with many concerns. First, in the section delineating why the project must be funded in FY 87 there is the statement "BLM's position is that it is not their responsibility to reduce or alleviate the problem, and the site does not qualify for CERCLA remedial actions because ground water is not currently imperiled." How could this be our position on a NESHAPS violation, when we were never notified by your agency that a violation had occurred. The first time we became aware of an "Air Quality problem" was by that initial call from our Washington Office. The second part of that statement -- "the site does not qualify for CERCLA remedial...because ground water is not imperiled" -- is in no way accurate. Also, the form states that the asbestos piles blow across a heavily used State highway. This statement refers to Interstate 5 which is miles away from the area and does not receive the asbestos dust.

It appears that your staff cut and pasted various inputs from prior correspondence on the NPL listing concerns from our agency and never went back to read and analyze what the new sentence that they had created was actually saying.

As two agencies currently working together on the Atlas Mine as a Superfund site, we don't fully understand why the Air Quality problem is being separated as an issue and not being dealt with under the Superfund process. Whatever avenues are determined necessary to address this site we would appreciate greater attention being placed upon up front coordination so that we are not surprised by any future issues that may arise.

Sincerely,

Ed Hastey

Ed Hastey
State Director

Enclosures

cc:

WO 501 (Room 5647) ✓

DM, Bakersfield

CAA

Tom Loomis - DOJ, D.C.
8-343-8661

ATTACHMENT IV

REPORT OF
NEEDED PROJECT - FISCAL YEAR 1987

PARENT AGENCY: U.S. BUREAU OF LAND MANAGEMENT (INTERIOR DEPT.)

FFID:

FACILITY NAME: ATLAS ASBESTOS SITE (ABANDONED MILLING & MINING SITE).

FACILITY LOCATION: Near town of Coalinga; Fresno County, Calif. (on BLM Lands)

STATUTORY REQUIREMENT FOR PROJECT: CAA Sec. 112 & 40 CFR 61(m).

DATE COMPLIANCE MUST BE ACHIEVED: AS SOON AS POSSIBLE.

COMPLIANCE STATUS OF FACILITY IN MEETING STATUTORY REQUIREMENT: ESDP

POLLUTION CONTROLS REQUIRED: (see below).

ESTIMATED COST OF CONTROLS: \$10 million.

WHY PROJECT MUST BE FUNDED IN FY 87: Project must be rated "HIGH PRIORITY". The asbestos tailings piles blow into the area, across a heavily used State highway, etc., causing an on-going, severe threat to public health. BLM's position is that it is not their responsibility to reduce or alleviate the problem, and the site does not qualify for CERCLA remedial actions because ground water is not currently imperiled. The site is currently in violation of both CAA Sec. 112 & 40 CFR 61(m).

NAME OF EPA STAFF MEMBER PREPARING FORM: Nick Morgan, EPA Region 9
CR CERCLA STAFF MEMBER.

TELEPHONE NUMBER: 415-974-8918 or FTS 454-8918.

Atlas Asbestos Company, now out of business, mined & milled asbestos on BLM public lands. Currently, 140 acres of exposed, uncovered asbestos tailings piles are blowing into the air, and the area is also heavily used by hikers, ORV users, hunters, etc. These 140 acres need to be capped or covered. The program is required under the air program for NESHAPS violations, and is currently in violation of CAA & 40 CFR 61(m).

THIS PROJECT SHOULD BE DESIGNATED "HIGH PRIORITY". FOR IMMEDIATE FUNDING.

1. AUG 1985

NESHAPS Referral for Visible Emissions at the Atlas Asbestos Mine, Fresno County, CA

Original Signed By:

Harry Seraydarian, Director
Toxics and Waste Management Division (T-1)

David Howekamp, Director
Air Management Division (A-1)

Recently, while members of our Superfund Contractor, CH2M Hill, were collecting soil and stream sediment samples at the Atlas Asbestos mine site, visible emissions were observed originating from the tailings pile area of the site. Given the observed emissions, we thought it necessary to alert you and your staff of possible violations under the recently amended work place standards for asbestos, 40 CFR Part 61-National Emission Standards for Hazardous Air Pollutants; Amendments to Asbestos Standard; Final Rule dated April 5, 1984.

The Atlas Asbestos mine is probably a familiar name with you and your staff. In 1979 and 1980, the Region issued orders against Atlas Asbestos for Clean Air Act (CAA) violations associated with bag house operations at the mill site. The Atlas Asbestos mine has been inactive since 1980, and was nominated to the National Priorities List for Superfund response in September 1983.

The Atlas Asbestos site, as currently defined, is located in Fresno County, 18 miles northwest of Coalinga, California. The site area covers approximately 140 acres of U.S. Bureau of Land Management land and includes an open-pit, a mined ore stockpile area, mill facilities, and a process waste tailings area. The tailings area covers about 17 acres.

We are currently in the Remedial Investigation portion of work on the site. ~~This investigation covers air emissions, surface water run-off, and soils analysis in and around the immediate area of the site.~~ We have been working with your staff to develop an air sampling plan for the site that is scheduled to start in late August.

Richard Martyn is the Regional Project Manager for this site. If you or your staff require any additional information or assistance, please feel free to contact him at 4-7514.

Thank you for your attention in this matter, and for your assistance in the development of our air sampling plan.