W.O. 501 - Room 5647

IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

2033
(CA-932.8)

JUN 28 1985

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

Dear Mr. Wise:

It has come to our attention recently comments concerning the Atlas Mine RI/FS and a short cover note (enclosure 1) were submitted directly to your office from an employee of the Department of Interior, Office of Environmental Project Review. The cover note stated, "Attached for your information...is a copy of comments...which I am sending to Pat Port.... Ms. Port is overseeing DOI coordination efforts on this project at the field level." This note is misleading and requires clarification. I have enclosed a memorandum (enclosure 2) from our Washington Office to the Office of Environmental Project Review, DOI.

The coordination channels that your staff has used for the past year and a half have not changed. Our process is to insure the DOI Regional Solicitor in Sacramento is in full agreement with our participation and comments concerning the Atlas Mine. Any future correspondence reflecting BLM's official position concerning the Atlas Mine or any other hazardous material site on public lands in California will be issued by this office.

We appreciate your cooperation in this matter and should you have any questions, please feel free to contact our Hazardous Materials Specialist, Ms. Lois Payne.

Sincerely,

Ed Hastey

Ed Hastey
State Director

2 Enclosures
Encl. 1 -- Comments and cover note
Encl. 2 -- Washington Office memorandum

cc:
Bruce Blanchard -- DOI, OEPR
Pat Port -- REO, Region IX
Bernie Hyde -- W.O. (501--Room 5647)

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY

Office of Environmental Project Review

Attached for your information and use as appropriate is a copy of comments which I am sending to Pat Port, (FTS 8-552-8200) Southwest Regional Environmental Officer, Department of the Interior. Ms. Port is overseeing DOI coordination efforts on this project at the field level.

Tom Loomis

Tom Loomis, Chief
Minerals Section
(FTS-8-343-8661)

5/13/85

Tom H. W. Loomis, P.E.
OFFICE OF ENVIRONMENTAL
PROJECT REVIEW

EARTH SCIENCES
GEOLOGY
MINING

U.S. DEPT. OF THE INTERIOR
WASHINGTON, DC 20240
(202) 343-8661

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

May 9, 1985

Memorandum

To: Pat Port

From: Tom Loomis

Subject: Review of Final Work Plan Remedial Investigation/Feasibility Study for the Atlas/Coalinga Asbestos sites

General -

There is an ambivalence throughout document as to whether both the Atlas and Coalinga mine sites are being addressed or just the Atlas site. Related to this is the lack of clarity as to where remedial actions are to be focused, just on the mine site(s) or on the entire watershed from the area of serpentine rock. A serious deficiency of the document is failure to clearly indicate the area of serpentine rock outcrop and asbestos-rich zones.

Other information that should be provided to ensure adequate evaluation of the problem and possible remedial actions includes: location and description of other mines and prospects in area, quantity of tailings at Atlas site, stability of tailings, and discussion of other activities in the area that could have a bearing on susceptibility of the soils to erosion.

Sample plan-

Stream sample sites S-5 thru S-8 sample tributaries in the upper reaches of White Creek; S-3 samples White Creek just above its confluence with Pine Canyon Creek, after numerous tributaries have augmented the flow. I would suggest an additional sampling site on White Creek just below site S-5; this will provide a check on any stream flow and sediment yields that might be derived from S-5 thru S-8.

In view of the very real question as to the relative significance of the quantity of asbestos contribution by the mine sites compared with that occurring naturally from the soils of the area, a more rigorous sampling program should be developed for soil areas adjacent to the mine sites. Six sample locations (p. A11) hardly seems an adequate representation on which to base background asbestos estimates for the area. Again, lack of definition of the asbestos-rich zone and serpentine rock outcrop area as a whole makes this difficult to evaluate. The question also arises as to whether the serpentine area is well enough defined to allow representative sampling.

I note that only stream samples S-12 and S-13 are to be analyzed for heavy metals - these represent only the immediate areas of the Atlas and Coalinga asbestos mine sites, a very small portion of the asbestos-rich zone and the serpentine drainage area. There

are both mercury and chromium mines and prospects in the drainage area of concern. At least two other samples should be selected for heavy metal analyses - one to represent the serpentine area and one from a drainage outside the serpentine area as a control.

I note that soil samples from four mine site locations are to be analyzed for heavy metals. Again, in view of the mineral history of the area, some of the soil samples from the serpentine area should be similarly analyzed to establish local background levels.

Sample analysis-

It seems to me that the analysis method ("total release") proposed to determine asbestos levels in sediments will give unnaturally high results - beyond what might be expected from normal attrition through stream flow. However, not knowing the extent of grinding proposed, the washing procedures, etc., I can't evaluate the protocol further. I would urge that at a minimum some samples (both sediments and soil splits) be processed both with and without grinding as a control.

Finally, I question both the wisdom and the importance of relying on EMS Laboratories for the sediment asbestos analyses. The rationale that they have done the previous asbestos studies for DWR-an interested party in this case-is not persuasive; rather it would seem that the question of bias could be raised. Other competent laboratories using accepted protocols should be able to produce comparable analyses. Reproductibility of results, by others as well as the original laboratory, is a critical criteria of an acceptable analysis.

In summary, it does not appear that the sampling program as designed has the capability to provide the information sought. In particular, the sampling of the soil areas adjacent to the mines and the analytical procedures for free asbestos determinations should be reevaluated. The heavy metal screening analyses should include samples away from the two mine sites. In view of the unique questions and problems presented by this site, as well as the importance and controversial nature of the problem, it is essential that the results obtained from any studies conducted be defensible.

5/13/85

IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

3040 (501)

JUN 14 1985

Memorandum

To: Tom Loomis, Office of Environmental Project Review

From: Chief, Hazardous Materials and Program Management Staff, BLM

Subject: Your Comments on Atlas Asbestos RI/FS Work Plan

Thank you for your comments of May 9, 1985, to EPA Regional IX regarding the Final Work Plan for the Remedial Investigation/Feasibility Study for the Atlas Mine hazardous waste site. We appreciate your technical support on this issue.

Please be advised, however, that the interagency lead for the Department of the Interior for the activities associated with cleanup of this National Priority List hazardous waste site is the California Regional Solicitor's Office. They review all correspondence going to the EPA on this matter for consistency with the Department's legal policies regarding the Atlas sites. In the future, please send all correspondence to EPA Region IX on the Atlas case through Al Johns of the Regional Solicitor's Office.

Bernie Hyde, Jr.

cc:
Lois Payne-CASO, Al Johns-CA Reg. Sol
Sherry Katz-SOL, 501 RF, Doc. 0091H
501:BHyde:smb:6/13/85