To: 'Brown, Anthony R (RM)'[anthony.brown@bp.com]
Cc: Neil Mortimer[Neil.Mortimer@washoetribe.us]; Black, Ned[Black.Ned@epa.gov]; Cory Koger[Cory.S.Koger@usace.army.mil]; Darrel Cruz 1[dcruz@washoetanf.org]; Darrel Cruz 2[Darrel.Cruz@washoetribe.us]; David Friedman[dfriedman@ndep.nv.gov]; Diane Vitols[Diane.Vitols@washoetribe.us]; Doug Carey[douglas.carey@waterboards.ca.gov]; Fred K[fredk@aeseinc.com]; Gary Riley[Riley.Gary@epa.gov]; Greg Reller[gr@burlesonconsulting.com]; Joshua Wirtschafter (Wirtschafter.Joshua@epa.gov)[Wirtschafter.Joshua@epa.gov]; Ken Maas[kmaas@fs.fed.us]; Lombardi, Marc (marc.lombardi@amecfw.com)[marc.lombardi@amecfw.com]; Patty Cubanski[pc@burlesonconsulting.com]; Sanchez, Yolanda[Sanchez.Yolanda@epa.gov]; Serda, Sophia[Serda.Sophia@epa.gov]; Shaffer, Caleb[Shaffer.Caleb@epa.gov]; Steve Hampton[Steve.Hampton@wildlife.ca.gov]; Thomas Maurer[thomas_maurer@fws.gov]; Toby McBride[toby_mcbride@fws.gov]
From: Deschambault, Lynda
Sent: Thur 12/22/2016 8:21:09 PM
Subject: EPA Comments on TOC, Reporting, and RI/FS Completion Schedule
EPA comments on TOC and Reporting and Schedule_12.22.16.pdf

Dear Mr. Brown,

The US Environmental Protection Agency (EPA) has reviewed the following Atlantic Richfield Company's (ARC) submittals:

- March 13, 2015 and December 4, 2015 RI/FS Table of Contents (TOC);

- June 3, 2016 Remedial Investigation/Feasibility Study Schedule Update, and

- September 9, 2016 Reporting Options for Upcoming Interim RI Submittals.

This work is being performed pursuant to the Administrative Order for Remedial Investigation and Feasibility Study (RI/FS), Leviathan Mine, Alpine County, California

(CERCLA Docket No. 2008-18, June 23, 2008).

EPA and ARC have made significant progress in expediting the completion of the RI/FS. At our last meeting ARC and EPA were in close agreement.

ARC indicated that the final and complete RI/FS could be completed by December 2018 and

EPA has requested an inclusive *draft* RI/FS by December 31, 2017 and a complete and *final* RI/FS by August 30, 2018.

EPA's proposed timeline is reasonable and follows EPA guidance (EPA/540/G-89/004) and common practices at other Superfund sites.

The RI/FS schedule is based on: ensuring an agreed upon format; consolidation of field efforts; timely review, presentation and use of collected data; parallel completion of the Ecological and Human Health Risk Assessments, Remedial Investigation (RI) and Feasibility Study (FS); and final preparation of one approvable integrated final and complete RI/FS report.

In preparation for our discussion at our January 17, 2017 meeting, EPA provides the attached comments and looks forward to reaching an agreed upon RI/FS Schedule.

Within 30 days or by January 22, 2017 please provide a response to all general and specific comments, an annotated Table of Contents, and an updated schedule that reflects concurrent development of the TDSR's, RI, the FS and the risk assessments for an inclusive *draft* RI/FS by December 31, 2017 and a complete and *final* RI/FS by August 30, 2018.

EPA looks forward to our January 17, 2016 face-to-face meeting in San Francisco to discuss these comments and reach agreement on this final RI/FS schedule.

If you have any questions, please feel free to contact me at (415) 947-4183 or Deschambault.lynda@epa.gov.

Best Regards,

Lynda Deschambault

Environmental Scientist

USEPA Region 09

(415) 947-4183

Please be advised I may have limited access to email , therefore please be patient with any communication delays.

From: Lombardi, Marc [mailto:Marc.Lombardi@amecfw.com]
Sent: Wednesday, December 21, 2016 11:05 AM
To: Deschambault, Lynda <Deschambault.Lynda@epa.gov>; Brown, Anthony R (RM) <anthony.brown@bp.com>
Subject: RE: ANNOTATED TABLE OF CONTENTS: Followup/ Schedule Discussions at December 13 Technical Meeting

Lynda,

Attached is Atlantic Richfield's March 13, 2015 submittal containing the TOC and the December 4, 2015 letter transmitting responses to U.S. EPA comments dated November 4, 2015 and to LRWQCB comments dated March 23, 2015. We did not incorporate our December 4 responses into the TOC as we anticipated further discussion with U.S. EPA during the December 10, 2015 and January 19, 2016 meetings along with the fact that the comments and responses were fairly straight forward and not worth spending the time to circulate another draft or the TOC but rather assumed that they would be incorporated into the document itself.

Should you have any questions or comments please contact Tony Brown at (714) 228-6770 or anthony.brown@bp.com.

Thanks,

Marc

Marc R. Lombardi, CEM, PG

Principal Geologist / Office Manager, Environment & Infrastructure Americas, Amec Foster Wheeler

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