To: Brown, Anthony R (RM)[anthony.brown@bp.com]
Cc: Greg Reller[gr@burlesonconsulting.com]; Cory Koger[Cory.S.Koger@usace.army.mil]; Chang, Kay SPK[Kay.Chang@usace.army.mil]; Lombardi, Marc (marc.lombardi@amecfw.com)[marc.lombardi@amecfw.com]; Gary Riley[Riley.Gary@epa.gov]; Wetmore, Cynthia[Wetmore.Cynthia@epa.gov]
From: Deschambault, Lynda
Sent: Fri 7/21/2017 4:20:40 PM
Subject: FW: EPA Concurrence on Field Work for ICT Amendment No. 2 – Full Scale Field Demonstration

Dear Mr Brown:

As per our concurrence on the Interim Combined Treatment Field demonstration project, we appreciate the ARC weekly updates. Since the field demonstration began we have received two reports dated July 5 and July 13. And one due July 20th is to be submitted.

The reports are helpful and informative, but do not seem to provide all information EPA requested for inclusion. As requested in the May 8 email, The weekly reports should highlight volumes, identify any exceedances of the discharge criteria in the effluent discharged to Leviathan Creek, details on how long effluent is recirculated to Pond 4 versus how long effluent is discharged to the creek, and volumes of discharges to the creek, so that EPA can estimate the mass of any metals discharged to Leviathan Creek.

Could you please ensure that next report is prompt and inclusive? Of particular importance because field parameters will be used as a surrogate for lab analysis, please include a summary table of the daily pH, specific conductance, DO, and field iron measurements; summary of daily volumes treated as well as quantity of Upper Pond water should be summarized; and a description of any upsets and/or challenges encountered.

Thank you!

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: Deschambault, Lynda [mailto:Deschambault.Lynda@epa.gov]
Sent: Monday, May 8, 2017 05:54 PM
To: 'Brown, Anthony R (RM)' <anthony.brown@bp.com>
Cc: tavassoli, lily <tavassoli.lily@epa.gov>; Wetmore, Cynthia <Wetmore.Cynthia@epa.gov>; Black, Ned <Black.Ned@epa.gov>; Cory Koger <Cory.S.Koger@usace.army.mil>; Barton, Dana <Barton.Dana@epa.gov>; Darrel Cruz 2 <Darrel.Cruz@washoetribe.us>; David Friedman <dfriedman@ndep.nv.gov>; Doug Carey <douglas.carey@waterboards.ca.gov>; Fred K <fredk@aeseinc.com>; Riley, Gary <riley.gary@epa.gov>; Greg Reller <gr@burlesonconsulting.com>; Wirtschafter, Joshua <Wirtschafter.Joshua@epa.gov>; Ken Maas <kmaas@fs.fed.us>; Lombardi, Marc (marc.lombardi@amecfw.com) <marc.lombardi@amecfw.com>; Michelle Hochrein <michelle.hochrein@washoetribe.us>; Patty Cubanski <pc@burlesonconsulting.com>; Serda, Sophia <Serda.Sophia@epa.gov>; Steve Hampton <Steve.Hampton@wildlife.ca.gov>; Thomas Maurer <thomas_maurer@fws.gov>; Toby McBride <toby_mcbride@fws.gov>
Subject: FW: EPA Concurrence on Field Work for ICT Amendment No. 2 – Full Scale Field Demonstration

Dear Mr. Brown:

EPA would like to further clarify our attached comments on the Interim Combined Treatment field demonstration project dated April 27, 2017 (attached)

EPA understands that this project is considered an “optimization trial” subject to

conditional exemption from stipulated penalties under the AOC for the Removal Action at Leviathan; Paragraph 104 .

It is EPA's understanding that the nature of this trial is inherently limited to 30 days or sooner if the water supply runs out. If the optimization trail is to be extended beyond that period, please notify EPA. During the trial, EPA requests that ARC provide EPA with weekly reporting to include field monitoring (pH, turbidity, flow, iron) and available laboratory analytical results ; EPA requests that ARC collect daily effluent samples during the first week of ICT operations and analyze these samples for all analytical compliance sampling analytes. The weekly reports should highlight volumes, identify any exceedances of the discharge criteria in the effluent discharged to Leviathan Creek, details on how long effluent is recirculated to Pond 4 versus how long effluent is discharged to the creek, and volumes of discharges to the creek, so that EPA can estimate the mass of any metals discharged to Leviathan Creek.

As noted in EPA's partial approval dated April 24, 2017, EPA is completing its review and will provide more detailed comments under separate cover.

Please provide a summary report with all data within 90 days of completion of the field demonstration.

As noted, EPA is completing its review of the full ICT submittal and will provide additional comments in a separate letter.

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: Deschambault, Lynda
Sent: Tuesday, April 25, 2017 1:08 PM
To: Brown, Anthony R (RM) <anthony.brown@bp.com>
Cc: lily tavassoli (tavassoli.lily@epa.gov) <tavassoli.lily@epa.gov>; Black, Ned <Black.Ned@epa.gov>; Cory Koger <Cory.S.Koger@usace.army.mil>; Dana Barton <Barton.Dana@epa.gov>; Darrel Cruz 2 <Darrel.Cruz@washoetribe.us>; David Friedman <dfriedman@ndep.nv.gov>; 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>; Michelle Hochrein <michelle.hochrein@washoetribe.us>; Patty Cubanski <pc@burlesonconsulting.com>; Serda, Sophia <Serda.Sophia@epa.gov>; Steve Hampton <Steve.Hampton@wildlife.ca.gov>; Thomas Maurer <thomas_maurer@fws.gov>; Toby McBride <toby_mcbride@fws.gov>
Subject: EPA Concurrence on Field Work for ICT Amendment No. 2 – Full Scale Field Demonstration

Dear Mr. Brown,

EPA has considered Atlantic Richfield's Draft Amendment No. 2- Full Scale Field Demonstration Interim Combined Acid Drainage Treatability Investigation Work Plan, Leviathan Mine Site, Alpine County, California dated March 31, 2017 (work plan amendment). This work plan was submitted as partial fulfillment of the Scope of Work for completing the remedial investigation and feasibility study to identify a long term remedy pursuant to Administrative Order for Remedial Investigation and Feasibility

Study (RI/FS), Leviathan Mine, Alpine County, California (CERCLA Docket No. 2008-18, June 23, 2008); and the Administrative Settlement Agreement and Order on Consent for Removal action, CERCLA Docket No. 2008-29/2009(a), effective January 21, 2009 (and modified as of July 22, 2013) .

EPA provides concurrence on the field demonstration work. Please know that concurrence with performing the proposed treatability study does not imply agreement with ARC's descriptions of expected flow and chemistry conditions at the site. . EPA also expects any ongoing ERA/removal action attempting treatment of combined flows that may be proposed based on results of ICT trials to include contingencies that will prevent overflow of untreated acid drainage to Leviathan Creek.

EPA is completing its review of the submitals and will provide additional comments in a separate letter.

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: Friday, March 31, 2017 06:10 PM
To: Lynda Deschambault (deschambault.lynda@epa.gov) <deschambault.lynda@epa.gov>
Cc: Brown, Anthony R (RM) <anthony.brown@bp.com>; Gary Riley (riley.gary@epa.gov) <riley.gary@epa.gov>; Hillenbrand, John <Hillenbrand.John@epa.gov>; DCarey@waterboards.ca.gov; Chris Stetler (chris.stetler@waterboards.ca.gov) <chris.stetler@waterboards.ca.gov>; Johnson, Brian S <Brian.S.Johnson@bp.com>; Block, Nathan <Nathan.Block@bp.com>; Cohen, Adam <Adam.Cohen@dgslaw.com>; 'Sandy Reise' <sriese@ensci-inc.com>; Weber, Craig L <Craig.Weber@amecfw.com>; Grant Ohland - (gohland@ohlandhydrogeo.com) <gohland@ohlandhydrogeo.com>; McCarthy, Dave T (Copper Environmental Consulting) <dave.mccarthy@copperenv.com>; 'Jeremy Boucher' <jboucher@broadbentinc.com>; Michelle Hochrein (michelle.hochrein@washoetribe.us) <michelle.hochrein@washoetribe.us>; Fred E. Kirschner (fredk@aeseinc.com) <fredk@aeseinc.com>; Cory Koger <Cory.S.Koger@usace.army.mil>; Greg Reller <gr@burlesonconsulting.com>; Jefferson, Jill <Jill.Jefferson@amecfw.com>; Andrews, Andy <Andy.Andrews@amecfw.com>
Subject: Leviathan Mine - Interim Combined Acid Drainage Treatability Investigation Work Plan - Draft Amendment No. 2 – Full Scale Field Demonstration

Lynda,

On behalf of Atlantic Richfield, Amec Foster Wheeler is submitting the draft Amendment No. 2 – Full Scale Field Demonstration to the Interim Combined Acid Drainage Treatability Investigation Work Plan for the Leviathan Mine Site in Alpine County, California. Hardcopy to follow.

Should you have any questions or comments please contact Tony Brown at (657) 529-4537 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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