Deschambault, Lynda

From: Deschambault, Lynda
Sent: Friday, August 12, 2016 12:22 PM
To: 'Brown, Anthony R (RM)'
Cc: 'Lombardi, Marc'; Black, Ned; Bruck, Glenn (Separated 5/28/16); Cory Koger; Darrel Cruz 1; Darrel Cruz 2; David Friedman; Doug Carey; Fred K; Greg Reller; Joshua Wirtschafter (Wirtschafter.Joshua@epa.gov); Ken Maas; Lombardi, Marc (marc.lombardi@amecfw.com); Lynelle Hartway; Patty Cubanski; Sanchez, Yolanda; Serda, Sophia; Shaffer, Caleb; Steve Hampton; Thomas Maurer; Toby McBride
Subject: EPA Conditional Approval on the Fish Sampling TSAP
Attachments: 160513 AppD Fish Substantive_Compiled.pdf; FK_Resp_EPA_160205 _Fish_TSAP_Compiled_Comments.pdf; EPA Comments onFi shSampling_05.13.16.pdf; 160222 RWQCB Comms on Draft TSAP for Fish Investiga tion FINAL.pdf; EPA Comments on Fish TSAP_08.12.16.pdf

Dear Mr. Brown:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Task Sampling and Analysis Plan for Fish Investigation (Draft Final) (TSAP), Leviathan Mine Site, Alpine County, California, Leviathan Mine Site, Alpine County, California, dated June 13, 2016. Atlantic Richfield Company (ARC) submitted the TSAP to EPA pursuant to the Administrative Order for Remedial Investigation and Feasibility Study, Leviathan Mine, Alpine County, California (CERCLA Docket No. 2008-18, June 23, 2008).

EPA has completed its review of the June 13, 2016 submittal and provides the attached line by line response to ARC's response to EPA's May 13, 2016 comments.

EPA conditionally approves this document, provided these comments are addressed and incorporated as described. The work outlined in this Task Sampling Analysis Plan should be completed during the 2016 field season.

Section 9 of the TSAP states that Fish sampling will begin in August to prevent missing the 2016 field season due to early snow. Large brown trout typically swim upstream to spawn in September. USFWS was able to successfully collect fish in late October of 2013. USGS flow data show that 2016 flows are higher at both locations than they were during the same time period in 2013. **EPA requests that the sampling occur in late September.**

EPA requests timely notification of EPA of when ARC anticipates commencing the work. EPA notes that the information collected under this TSAP will be used to support both the Human Health and Ecological risk assessments, and that EPA has provided separate technical comments on the Human Health and Ecological risk assessment work plans

These comments reflect Washoe Tribe of Nevada and California response to the TSAP provided to EPA. EPA continues to work with the Tribe to ensure that their concerns regarding analysis of fish tissue are addressed.

Please provide a written report to EPA within 90 days of completion of field work.

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: Monday, June 13, 2016 7:24 PM
To: Deschambault, Lynda <Deschambault.Lynda@epa.gov>
Cc: Brown, Anthony R (RM) <anthony.brown@bp.com>; Riley, Gary <riley.gary@epa.gov>; Hillenbrand, John <Hillenbrand.John@epa.gov>; DCarey@waterboards.ca.gov; Block, Nathan <Nathan.Block@bp.com>; Cohen, Adam <Adam.Cohen@dgslaw.com>; Sandy Riese <sriese@ensci-inc.com>; Grant Ohland - (gohland@ohlandhydrogeo.com) <gohland@ohlandhydrogeo.com>; McCarthy, Dave T (Copper Environmental Consulting) <dave.mccarthy@copperenv.com>; Koger, Cory S SPK <Cory.S.Koger@usace.army.mil>; Greg Reller <gr@burlesonconsulting.com>; Ken Maas <kmaas@fs.fed.us>; Lynelle.Hartway@washoetribe.us; Fred E. Kirschner (fredk@aeseinc.com) <fredk@aeseinc.com>; Jefferson, Jill <jill.jefferson@amecfw.com>; Parrish, Kent <kent.parrish@amecfw.com>; Ellis, Steve <steve.ellis@amecfw.com>; Lombardi, Lynda <lynda.lombardi@amecfw.com>; Ann Verwiel <averwiel@toxstrategies.com>
Subject: Leviathan Mine - On-Property, Off-Property Area, and Reference Area FRI Work Plans – TSAP for Fish Investigation (Draft Final)

Lynda,

On behalf of Atlantic Richfield, Amec Foster Wheeler is submitting the draft final *On-Property, Off-Property Area, and Reference Area Focused Remedial Investigation Work Plans – Task Sampling and Analysis Plan for Fish Investigation* for the Leviathan Mine Site in Alpine County, California. Hardcopy to follow.

This document is available for immediate download on the Leviathan Mine SharePoint Site via the following hyperlinks:

This document is stored on this site. Click here to directly access the folder where these folders/documents are stored. Click on the links below to access each folder/document individually:

Title	Folder/File
	160613 Fish TSAP_Compiled.pdf

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

Thanks,
Marc

From: Deschambault, Lynda [mailto:Deschambault.Lynda@epa.gov]
Sent: Friday, May 13, 2016 8:33 AM
To: Brown, Anthony R (RM)
Cc: Lombardi, Marc; Patty Cubanski; Black, Ned; Bruck, Glenn; Cory Koger; Darrel Cruz 1; Darrel Cruz 2; David Friedman; Doug Carey; Fred K; Greg Reller; Wirtschafter, Josh ua; Ken Maas; Lynelle.Hartway@washoetribe.us; Sanchez, Yolanda; Serda, Sophia; Shaffer, Caleb; Steve Hampton; Thomas Maurer; Toby McBride
Subject: EPA comments – TSAP for Fish Investigation

Dear Mr. Brown:

The U.S. Environmental Protections Agency (EPA) has reviewed the Draft On-Property, Off-Property, and Reference Area Focused Remedial Investigation Work Plans—Task Sampling and Analysis Plan for Fish Investigation, Leviathan Mine Site, Alpine County, California, prepared on behalf of the Atlantic Richfield Company (ARC) by AMEC, dated February 5, 2016 . This work was submitted to EPA pursuant to Administrative Order for Remedial Investigation and Feasibility Study, Leviathan Mine, Alpine County, California (CERCLA Docket No. 2008-18, June 23, 2008).

Attached please find EPA comments, along with comments from the Lahontan Regional Water quality Control Board dated February 3, 2016; and from the Washoe Tribe of Nevada and California dated February 5, 2016 for your full consideration.

At our upcoming June 13th meeting, EPA would like to discuss options for how the fish size used for tissue analysis can be extrapolated to fish consumed by human receptors.
Please provide line by line response to these comments along with a revised Sampling Analysis plan within 30 days, and prior to collecting samples please provide a revised map showing the sample locations identified based on the proposed mapping.

ARC must also submit documentation of compliance with substantive provisions of Applicable or Relevant and Appropriate Requirements related to taking fish for purposes of this TSAP and minimizing the probability of accidentally taking endangered or threatened species of fish, understanding that Section 121(e) of CERCLA exempts this sampling from procedural requirements related to permits to permits.

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: Friday, February 05, 2016 3:21 PM
To: Deschambault, Lynda <Deschambault.Lynda@epa.gov>
Cc: Brown, Anthony R (RM) <anthony.brown@bp.com>; Riley, Gary <riley.gary@epa.gov>; Hillenbrand, John <Hillenbrand.John@epa.gov>; DCarey@waterboards.ca.gov; Block, Nathan <Nathan.Block@bp.com>; Cohen, Adam <Adam.Cohen@dgslaw.com>; sriese@ensci-inc.com; Grant Ohland - (gohland@ohlandhydrogeo.com) <gohland@ohlandhydrogeo.com>; dave.mccarthy@copperenv.com; Koger, Cory S SPK <Cory.S.Koger@usace.army.mil>; Greg Reller <gr@burlesonconsulting.com>; Ken Maas <kmaas@fs.fed.us>; Lynelle.Hartway@washoetribe.us; Jefferson, Jill <jill.jefferson@amecfw.com>; Parrish, Kent <kent.parrish@amecfw.com>; Lombardi, Lynda <lynda.lombardi@amecfw.com>; Ellis, Steve <steve.ellis@amecfw.com>; Gonzales, Joseph D <joseph.gonzales@amecfw.com>
Subject: Leviathan Mine - Draft On-Property, Off-Property Area, and Reference Area FRI Work Plans – TSAP for Fish Investigation

Lynda,

On behalf of Atlantic Richfield, Amec Foster Wheeler is submitting the Draft On-Property, Off-Property Area, and Reference Area Focused Remedial Investigation Work Plans – Task Sampling and Analysis Plan for Fish Investigation for the Leviathan Mine Site in Alpine County, California. Hardcopy to follow. This document is available for immediate download on the Leviathan Mine SharePoint Site via the following hyperlinks:

This document is located in a folder titled Public Documents, stored on this site. Click here to directly access the folder where these folders/documents are stored. Click on the links below to access each folder/document individually:

Project #: 0013091150

Title	Folder/File
	160205 Fish TSAP_Compiled.pdf

Please let me know if you have any issues accessing the SharePoint Site.

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

Thanks,
Marc