UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105

July 27, 2017

Mr. Anthony R. Brown
Environmental Manager Atlantic
Richfield Company
4 Centerpointe Drive, LPR 4-435
La Palma, CA 90623-1066

Re: EPA Acceptance of Atlantic Richfield Final Reference Area Work Plan, Revision No. 1 Dated April 20, 2017

Dear Mr. Brown,

The US Environmental Protection Agency (EPA) has reviewed Atlantic Richfield's April 20, 2017 Final Reference Area Work Plan, Revision No. 1, Leviathan Mine Site, Alpine County, California. 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).

Background: Atlantic Richfield Company (ARC) provided the Final Reference Area Focused Remedial Investigation Work Plan, Leviathan Mine Site, Alpine County California on January 19, 2017. The April 20, 2017 submittal was provided in response to EPA conditional approval provided on February 16, 2017.

EPA has completed its review of this document, finds that the ARC responses EPA comments are adequate, and approves this document with the following comments to be incorporated.

- EPA understands that the requested reconnaissance mapping planned for the area above the Leviathan Mine Site will be completed this season. Please ensure that the stream reaches identified are sampled; and the data collected is fully considered in the draft Remedial Investigation.

- EPA has reviewed the Reference Area calculation of Reference Threshold Values (RTVs). EPA does not support the use of the upper simultaneous limit (USL) statistic to represent the Reference Threshold Value (RTV). The USL is the upper boundary of the largest value calculated so that all observations in a dataset are less than or equal to the USL, which means RTVs would be higher than the maximum value of a data set. Also, note that The Pro UCL

manual referenced is a useful source of information on how to use the software, and technical explanations of statistical tests, but should not be considered EPA policy or guidance. Please utilize the 95th percentile or 95% Upper Tolerance Limit (UTL) using the appropriate method based on the data distribution.

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

Sincerely,

Lynda Deschambault
Remedial Project Manager

Cc by electronic Email:

Scott Ferguson, California Regional Water Quality Control Board, Lahontan Region
Douglas Carey, California Regional Water Quality Control Board, Lahontan Region
Norman Harry, Washoe Tribe of Nevada and California
David Friedman, Nevada Department of Environmental Protection
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