To: Herrera, Angeles[Herrera.Angeles@epa.gov]
Cc: Miller, Amy[Miller.Amy@epa.gov]; Manzanilla, Enrique[Manzanilla.Enrique@epa.gov]; Ball, Harold[Ball.Harold@epa.gov]; Rodriguez, Dante[Rodriguez.Dante@epa.gov]; Maldonado, Lewis[Maldonado.Lewis@epa.gov]
From: Strauss, Alexis
Sent: Tue 6/20/2017 11:49:25 PM
Subject: Anaconda OU-8 ROD

Thanks. Recall that Brad Crowell offered to reach into BLM if need be to keep this moving….five weeks seems sluggish. A few questions:

- Is there an OLEM role for us?
- Who is paying?
- What does PW stand for?

Thx, Alexis

Alexis Strauss

Acting Regional Administrator

E.P.A. Region 9

75 Hawthorne Street

San Francisco, CA 94105

415-972-3572

From: Herrera, Angeles
Sent: Monday, June 19, 2017 8:47 PM
To: Strauss, Alexis <Strauss.Alexis@epa.gov>
Cc: Miller, Amy <Miller.Amy@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; Ball, Harold <Ball.Harold@epa.gov>; Rodriguez, Dante <Rodriguez.Dante@epa.gov>; Maldonado, Lewis <Maldonado.Lewis@epa.gov>
Subject: FW: draft email memo for Alexis re: Anaconda OU-8 ROD

Hi Alexis,

We wanted to give you some basic information about the upcoming Record Of Decision (ROD) for the Anaconda Mine, which just today started its routing for signatures. The ROD is for OU-8, the Arimetco Operable Unit. This OU is comprised of the heap leach pads and fluid management system that was abandoned by Arimetco Inc. when they went bankrupt back around 1999. OU-8 is the orphan-share OU; all other OUs are being funded by Atlantic Richfield under EPA Orders.

The signature process for the ROD is comprised of concurrent routing within the three partner agencies (EPA, BLM and NDEP), all of whom shall be signatories to the ROD. The routing started on Tuesday (6/13). NDEP signed it last week. BLM says that DOI in their Washington DC HQ will sign it, and their routing process will take 5 weeks. (BLM's goal is to have it signed by July 15). We (EPA) are now in the process of preparing our routing package and anticipate having it on Enrique's desk within a couple weeks to await his signature. Enrique plans to wait until BLM/DOI signs the ROD before he signs it.

The selected remedy is briefly summarized below.

SELECTED REMEDY:

1. **Evaporative covers.** Re-grade, re-shape and cover heaps (2 foot thickness at a minimum), include stormwater controls and collection channels surrounding the heaps.

2. **Upgrades to drain-down Fluid-Management System.** Upgrade, rehabilitate and repair.

3. **Passive evaporation treatment of drain-down fluids.** Continue current operations.

4. **Fluids management with wildlife deterrents.** Continue current operations.

5. **Upgrades to evaporation ponds.** Upgrade, rebuild ponds, locations may change.

6. **Closure of the 4-Acre Pond.** Remove and reprocess, or encapsulation (stabilize, seal with liner).

7. Site access and Land Use Controls.

a. No-climb fencing around ponds

b. Warning signage

c. Continue current perimeter control activities

d. Deed restrictions on private property. Prohibit residential, ensure remedy integrity.

e. Use restrictions on public property. BLM land management plan (same objectives).

8. Stormwater management system. Interim OU8 plan for stand-alone system, later incorporate into site-wide plan.

Cost Estimate: $36,111,000 (30-year PW of capital and O&M)

- Capital: $30,428,000
- Annual O&M: $381,700
- O&M 30-year PW: $5,683,000

Estimate Construction Time: 2 years

Please let us know if you would like to discuss further. My team and I are happy to schedule a briefing for you before Enrique signs it.

Thanks,

Angeles