In Reply Refer To: 3720 (9300)

August 31, 2010

Mr. R. Matthew Wilkening  
Red Devil Mine Project Manager  
U.S. Environmental Protection Agency, Region 10  
Idaho Operations Office  
1435 N. Orchard St.  
Boise, Idaho 83706

RE: Red Devil Mine Remedial Investigation/Feasibility Study (RI/FS) Work Plan

Dear Mr. Wilkening:

In response to your letter dated August 24, 2010, the BLM - Alaska would like to address concerns regarding finalizing the RI/FS work plan. The BLM has worked to facilitate the process of finalizing the RI/FS work plan by interacting with reviewers while addressing comments. The intended result was a plan that would enable a quick review of the final RI/FS work plan.

If we finalize the RI/FS work plan prior to mobilizing, we will eliminate the opportunity to perform field data collection this season. In lieu of missing a field season, we are proposing a limited sampling effort at the Red Devil Mine Site. The effort would allow for some data collection this year, to use for refining the scope of drilling and associated subsurface soil and groundwater sampling during the 2011 field season.

The BLM contractor, E&E, can mobilize to Red Devil Mine to accomplish a limited sampling effort within seven days of a notice to proceed from the BLM. The field activities outlined below will require approximately 14 days. Weather patterns in southwestern Alaska are transitioning from summer to winter during September, which is why the BLM would like to mobilize sometime between September 8 and 13. Consequently, the BLM must be in a position to authorize E&E to mobilize in early September.
As part of this limited field sampling effort, we will conduct the following activities at Red Devil Mine during September 2010:

1. Implementation of Field Sampling Plan (FSP) Section 2.1, Surface Soil. This would include the visual inspection of tailings coverage (FSP Section 2.1.1); Surface soil XRF screening (FSP Section 2.1.2); and collection of surface soil samples for laboratory analyses from all proposed surface sample locations (FSP Section 2.1.3).

2. Implementation of FSP Section 2.4, Red Devil Creek Surface Water and Sediment. This would include collection of all proposed surface water and sediment samples in the Red Devil Creek drainage.

3. Implementation of FSP Section 2.5, Kuskokwim River Sediment. This would include collection of all proposed river sediment samples in the Kuskokwim River. Implementation of this work would be dependent on the river level and the related accessibility to the proposed sampling sites.

4. Implementation of a portion of FSP Section 2.3, Groundwater. This would include collection of groundwater samples from the five existing monitoring wells within the Main Processing Area of the site.

Per our phone conversation last Friday, August 27, I understand that the EPA is concerned about involving the local population in the CERCLA process at Red Devil Mine. The BLM developed a Community Involvement Plan for this project and our initial consultations with local communities have been conducted in a manner consistent with federal policy.

Please call me at (907) 271-4426 if you have any questions.

Sincerely,

Mike McCrum
Red Devil Project Manager

cc: Jennifer Roberts/ADEC
Anne Marie Palmieri/ADEC
Jim Fincher/BLM
Larry Beck/BLM