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06/05/01 02:39 PM

To: Mike_Alcorn@ak.blm.gov

cc:

Subject: Re: Red Devil conceptual solid waste management plan

Mike, Please see the attached note.

(See attached file: alcorn.wpd)

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Red Devil Mine Conceptual Solid Waste Management Plan Comments

Nick Ceto, EPA Region 10 - June 5, 2001

Mike,

This note is provided to summarize the key points we recently by phone on June 4.

EPA concurs with the application of the Area of Contamination (AOC) concept to the removal action being taken at the Red Devil site. Thoughtful design of the on-site containment area within the AOC should provide an effective means to manage direct exposure at the site, as well as mitigating the continuing release of contaminants to the environment.

As we discussed by phone, EPA believes it is appropriate to consider treatment of contaminated soils and wastes that fail TCLP testing prior to consolidation in the containment area located within the AOC. This would help to minimize future risk posed by the site. The goal of treatment should be to reduce achieve TCLP test results that would allow the treated waste to be considered non-hazardous, which would for soils also meet RCRA Land Disposal Restrictions (LDRs). If during the course of your work you find highly concentrated mercury product this material should be shipped off-site for appropriate treatment/disposal.

It is not necessary to test debris prior to consolidation within the Area of Contamination, however, surface cleaning of this material prior to consolidation in the AOC is appropriate to the extent it facilitates collection of contaminated soils or processing waste that may require treatment.

You had asked specifically how bricks should be managed. I would suggest consolidation of the bricks within the AOC area that will include treated soils. Spraying them prior to consolidation with an encapsulating compound would be helpful, but not required.

Consolidation of slag within the AOC is acceptable, however, it would be useful to have a chemical analysis of this material to understand whether it should be treated prior to consolidation within the AOC.

Tailings at the site are Bevill exempt. However, they should be managed in a way that appropriately mitigates human health and ecological risk. At many mine sites this means in-situ management, but just as frequently it means consolidation and containment on-site. The risk assessment being developed for the facility will help you determine an appropriate management approach.

In reviewing your Conceptual Solid Waste Management Plan I noted several references to impacted soils being those that failed TCLP (see 5.2.4 for an example). TCLP is not an appropriate test for determining whether a soil is "impacted" or requires management, rather it provides information on leaching potential under a specific set of test conditions. It does not address all potential risk pathways. The baseline risk assessment that BLM is conducting will help you determine which soils should be included within the AOC rather than left in-place.

Finally, we discussed the need to make sure that no free mercury had made its way through cracks in the Retort foundation and into underlying soils. Please be certain to address this potential release pathway in your final cleanup proposal.

If you have additional questions please let me know. Nick