



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
IDAHO OPERATIONS OFFICE
1435 N. Orchard St.
Boise, Idaho 83706

August 24, 2010

Mr. Michael McCrum
Red Devil Project Manager
U.S. Department of the Interior
Bureau of Land Management
Anchorage Field Office
4700 BLM Road
Anchorage, Alaska 99507

Re: Red Devil Mine Remedial Investigation/Feasibility Study (RI/FS) Workplan

Dear Mr. McCrum:

The U.S. Environmental Protection Agency (EPA) received notice that the revised draft final workplan for the Red Devil Mine and Mill site remedial investigation/feasibility study (RI/FS) was posted to a web site late on the afternoon of August 18, 2010, with the expectation that EPA and Alaska Department of Environmental Conservation (ADEC) would finalize their review and enable field work to commence on Monday August 23. EPA will not be able to complete its review within this timeframe. Our review of the draft RI/FS Workplan raised significant issues. The RI/FS workplan is a critical document that will define the scope of the environmental investigations at the site. It is not possible to resolve these issues in such a short review period.

An option that would be acceptable to EPA would require BLM's agreement to propose a limited sampling effort, thus allowing the agencies to focus their review and comment (not approval or concurrence) on that portion of the workplan. BLM could then proceed with an initial phase of the investigation. Please let me know as soon as possible if you would like to proceed in this manner.

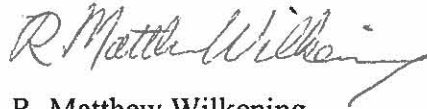
EPA is also concerned about the community and Tribal interests in this project. At most sites, the community and Tribes have an opportunity to review and comment on the scope of the planned work. We are aware of the initial outreach meetings that BLM hosted earlier this summer; however, these presentations were general in nature and the RI/FS workplan was not available at that time. Has consultation taken place with the local tribes consistent with federal policy?

The limited time between the receipt of the draft final document and the start of the field investigation increases EPA's concerns about how this project will proceed. I realize this is an inauspicious start to the Red Devil Mine cleanup, but the regulatory agencies need adequate time

to review documents to ensure (1) that they are consistent with the NCP and EPA Guidance and policy and (2) that the investigation will, in fact, yield the information necessary to assure adequate protection of human health and the environment at the Red Devil Mine and Mill site.

EPA looks forward to developing a cooperative working relationship with BLM and ADEC for the investigation and cleanup of the Red Devil Mine and Mill site. Accordingly, we request a teleconference with the project managers to discuss how a delay in the start of the field investigation would affect this project. Please call me at 208/378-5760 to discuss how to keep the investigation moving forward.

Sincerely,

A handwritten signature in cursive script that reads "R. Matthew Wilkening". The signature is written in black ink and is positioned above the printed name.

R. Matthew Wilkening
Red Devil Mine Project Manager

cc: Anne Marie Palmieri, ADEC
Dennis Faulk, EPA