

**REVIEW
COMMENTS**

**PROJECT: BLM Red Devil Mine
DOCUMENT: Draft Action Memo**

	DATE: 5/20/2014 REVIEWER: AMPalmieri PHONE: 907-766-3184	Action taken on comment by:
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Item No.	Drawing Sht. No., Spec. Para.	COMMENTS	RESPONSE
1	Section II.B.1	The background section covers about 4 pages of the 13 total for the AM. Much of the text deals with areas other than that covered by the NTCRA. Although the site background is important, for the purposes of this AM, I would suggest that this section is trimmed.	Understood. However, BLM believes that the current amount of information is needed to support the removal action. No reduction in text will be made.
	Section II.B.2	This section presents the fact that public meetings were held, however it does not include a summary of the public comments, as it should.	Additional information associated with the public meetings and comments will be added.
2	Section II.B.3	This section does not clearly draw the connection of the eroding contaminated tailings in Red Devil Creek to elevated sediments in the Kuskokwim River and potential risk to human health and the environment. The exposure pathways for human and ecological receptors should be described. The last paragraph in Section II.B.3(b) states that there is migration, however there should be discussion about sample results at the mouth of the delta and in the Kuskokwim River. The AM states that there is an 'imminent and substantial' risk, but doesn't back that up with data and sufficient narrative.	<p>The last two paragraphs in Section II.B.3 will be revised as follows:</p> <p>Antimony, arsenic, and mercury compounds were detected at the greatest concentrations relative to background. All three metals and are significantly elevated in the creek section extending from the Main Processing Area to the Red Devil Creek delta. Elevated concentrations of these same three metals were detected in Kuskokwim River sediment downstream of the mouth of Red Devil Creek.</p> <p>This non-time critical removal action is designed to minimize active erosion of tailings into Red Devil Creek and subsequent migration to the Kuskokwim River.</p> <p>The last paragraph will be augmented with text summarizing exposure pathways and risk.</p>
3	Section II.B.4	DEC will provide a letter of concurrence for this action. This section should include a statement that there is support for this action from the different agencies.	A statement that DEC concurs with the AM will be added.
4	Section V	The 'No Action' alternative should also be added to this list. There aren't sections where: 1) the other actions are briefly described, and 2) there is an explanation as to why this alternative was selected, i.e. why was this one preferred over the others and what criteria were used to make that decision.	The No Action Alternative will be added to the list. The AM does reference the EE/CA, which provides a thorough explanation of the alternative development and selection. The addition of alternative descriptions that were not selected will not provide additional support for the selected alternative. No change to the text is proposed.

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5	Section V.A.1, para 5	How often will the sediment in the trap be checked in order to determine if it needs to be excavated? Will BLM have a contract for this? Maintenance of the sediment trap should be included in the AM.	The trap will be checked annually during the interim period prior to site-wide remediation. Additional language associated with maintenance will be added.
6	Section V.A.1, para 7	How frequently will the geomembrane liner be inspected and maintained? Maintenance of the stockpile should be included in the AM.	The BLM will inspect the cover annually during the interim period prior to site-wide remedial action.
7	Section V.A.4	Schedule states "2015".	The schedule will be revised to state 2014
8	Attachment C	Last 2 columns should be revised so that they pertain only to the selected alternative. Also, the page numbers are "B-#", whereas this is attachment "C".	Agreed. Corrections will be made.
		-End of Comments-	