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Living Rivers Council

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Comments on the:

**Public Comment
Engineering Evaluation/
Cost Analysis
Mine Waste Removal Action
Bureau of Indian Affairs Road 120
Sulphur Bank Mercury Mine
Superfund Site**

The projects primary objectives are stated as:

- Reduce the long-term potential for exposure to current and potential future residents and potential future construction workers with mercury, arsenic, or antimony associated with mine waste from SBMM that was placed along BIA 120. The potential for exposure to the solid mine waste is through incidental ingestion of surface soils, inhalation of chemicals adsorbed by airborne dust, dermal exposure to trace metals in exposed soil, and inhalation of volatile mercury.
- Reduce contact with mine wastes along BIA 120 that contain metals above risk-based action levels in a manner that is consistent with a final remedy for the site. An additional objective is to minimize disruption to EIC residents and cultural resources during the removal action.

The scope of the removal action is to reduce exposure.

This cost analysis for the Alternatives proposed does not consider the cost of environmental evaluation of not removing all contaminated soils from the site. On going pollution contamination

from the Sulphur Banks Mercury Mine and Herman pit mining past activities along with the BIA 120 road construction continues to degrade the water quality of the Clear Lake basin. Bioaccumulation of mercury in the food chain damages ecosystems resulting in a economic disaster for the Lake County residences and business that suffer from contaminants such as mercury and arsenic etc.

The EPA should make every effort to ride this site of all mining waste through the most protective project that would remove all contaminates both on BIA 120, the Herman Pit and other contaminated areas on this site. To do less is to subject future generations to on-going contamination and continued loss of beneficial uses of the Clear Lake basin water.

Thank you,

Chris Malan
LRC Manager