



U. S. DEPARTMENT OF THE INTERIOR OFFICE OF INSPECTOR GENERAL

FLASH REPORT



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ENVIRONMENTAL, HEALTH AND SAFETY ISSUES AT BUREAU OF LAND MANAGEMENT RIDGECREST FIELD OFFICE RAND MINING DISTRICT, CA

C-IN-BLM-0012-2007

September 2007



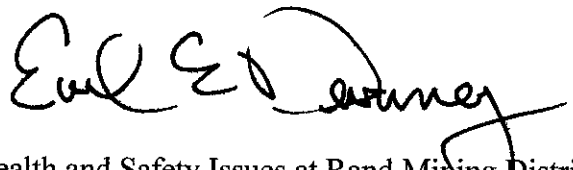
United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20240

SEP 12 2007

Memorandum

To: Secretary

From: Earl E. Devaney
Inspector General 

Subject: Environmental, Health and Safety Issues at Rand Mining District, CA,
Bureau of Land Management (Report No. C-IN-BLM-0012-2007)

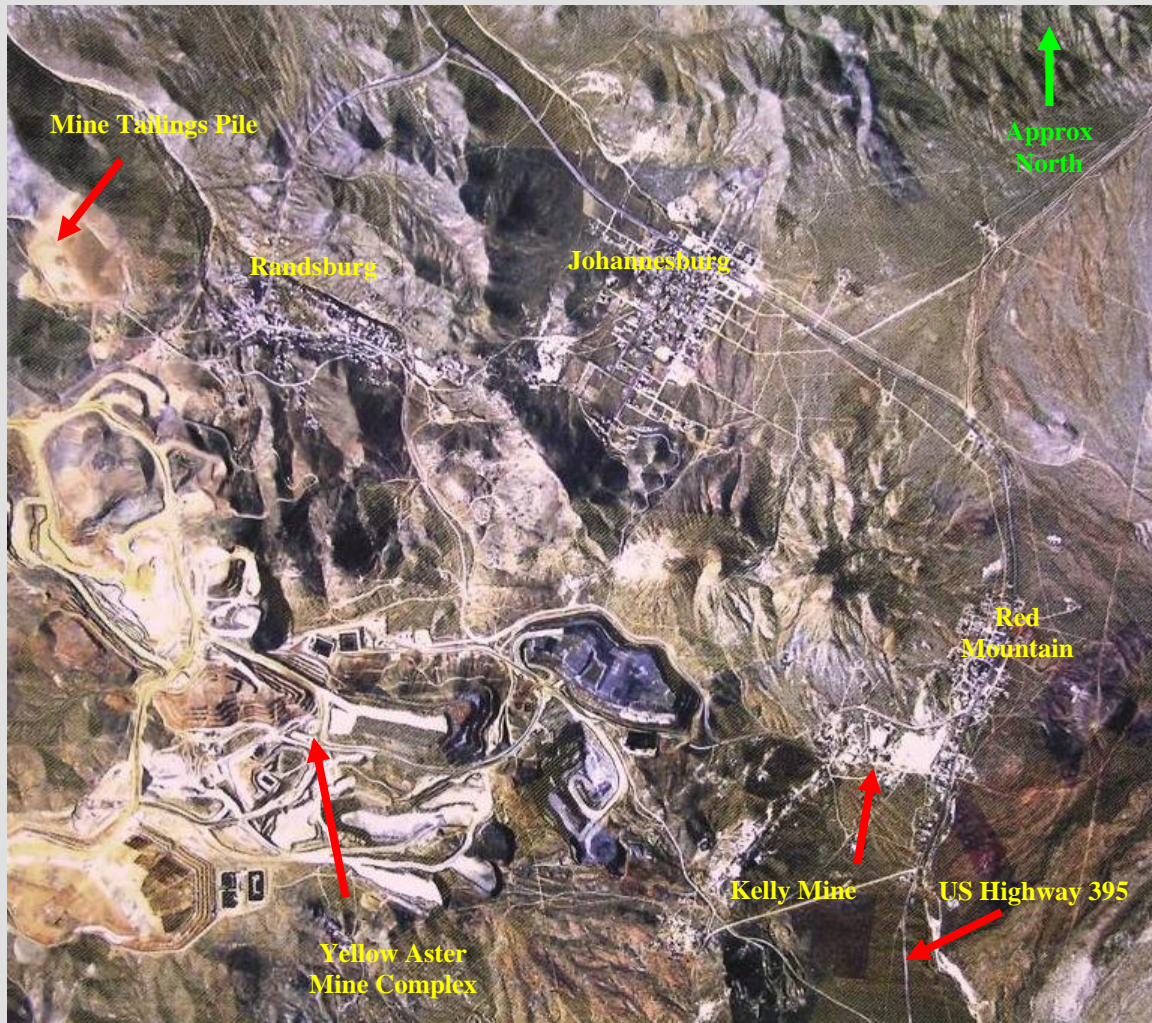
This report describes hazardous conditions at abandoned mine sites in California's Rand Mining District (District) that require immediate action to protect the health and safety of the public and employees. In February 2006, the Bureau of Land Management (BLM) identified evidence of serious environmental contamination in the District. Known contaminants include levels of arsenic which are thousands of times higher than EPA recognized safe levels. Arsenic is a known carcinogen that can also cause skin, stomach, and nerve damage. While BLM has initiated a Time-Critical Removal Action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), it has not taken timely action to mitigate the current health risks to the public and employees.

BACKGROUND

The Historic Rand Mining District is located in south central California about 23 miles south of the BLM Ridgecrest Field Office. It includes the small towns of Randsburg, Red Mountain and Johannesburg. The District's population totals about 400. The area was mined for gold and silver beginning in the late 19th century and has been mined sporadically since. Land in the area is predominantly under the jurisdiction of BLM. The area is a popular off-highway vehicle (OHV)¹ destination and as many as 30,000 visitors a day use the area's trails on some weekends.

¹ OHVs are vehicles mostly used for recreation and are generally prohibited from use on public roads. OHVs include all terrain vehicles (ATV), off-road motorbikes or dirt bikes, and some four-wheel drive vehicles.

Aerial Photo of Rand Mining District



BLM Photo

Soil samples collected near residential properties in February 2006 identified “very high” risks from levels of arsenic that, according to BLM, exceed EPA’s cleanup guidelines² by up to 4,700 times. As a result, BLM implemented a Time-Critical Removal Action under the CERCLA. BLM prepared an Action Memorandum in August 2006 and a Project Management Plan that identified short term proposed actions for mitigating the site. BLM intends to begin a CERCLA Remedial Investigation/Feasibility Study in 2007 to identify needed long-term mitigation actions in the District.

While BLM will not know the true cost of this project for some years, BLM officials have estimated that it could exceed \$170 million. The project is one of the largest environmental clean-up projects ever managed by BLM. To put the project’s size in perspective, BLM has a total annual Abandoned Mine Lands (AML) budget of about \$10 million which is allocated from BLM’s Soil, Air & Water and Hazardous Materials Management programs.

² The levels exceeded EPA Region IX’s Preliminary Remediation Goals (PRGs), which are used as guidelines for evaluating and cleaning up contaminated sites.

OIG OBSERVATIONS

We conducted two site visits to BLM's Ridgecrest Field Office and the District in March and May 2007. We interviewed BLM field office staff and local residents about the project's history and management and the physical and environmental hazards in the area. We also visited the BLM California State Office in March 2007 and interviewed staff there about the District.

Environmental hazards in the District include high levels of arsenic contamination in over 3,000 acres of mine tailings and 500,000 tons of additional mining related waste rock. This material is widely dispersed across the District and has potential health risks to the approximate 400 residents of the District, the thousands of OHV visitors that visit the region, as well as BLM staff that visit the site to monitor the project.

We reviewed the CERCLA Action Memorandum and the Project Management Plan and noted that actions scheduled for FY 2007 included addressing physical threats, fencing of mine features, installation of air monitoring stations and initiation of a site-wide community relations plan.

EXPOSURE TO RESIDENTS

The area's dry climate and winds routinely expose residents to arsenic-laden dust. In addition, some residential properties are located adjacent to contaminated tailings piles. At the time of our visit, BLM had not sampled all potentially affected residential properties to determine their levels of contamination. In August, we were informed that BLM had sampled 20 residential properties. However, the test results were not yet available. We concluded that BLM has not taken sufficient steps to identify the extent of contamination on residential properties.

During the 18 months since the project began, BLM has conducted only two public meetings; BLM has not developed and implemented a Community Relations Plan as called for in its Project Management Plan. CERCLA requires BLM to give the public prompt, accurate information on the nature of hazards and activities planned to mitigate these hazards. We conducted interviews with residents who complained that they were not being kept informed of project activities. In addition, the last public meeting was in October 2006. We concluded that BLM needs to be more proactive in its community relations efforts.

Additionally, we are concerned that BLM has not installed air monitoring equipment to measure arsenic exposure levels and has not fenced hazardous mine sites and tailings as planned in the Action Memorandum.



OIG Photo



BLM Photo

EXPOSURE TO OHV USERS

The District is a popular destination for OHV users. Near Randsburg, Route 110, a BLM authorized trail, crossed a 60 acre highly contaminated mine tailings pile. As recently as April 2007, the trail was used by many recreational OHV enthusiasts. At the time of our visit, BLM had taken no action to close the portion of the trail that crossed the contaminated tailings pile or to install fences along Route 110 to restrict access to highly contaminated areas. OHV users could potentially be exposed to significant levels of arsenic. Subsequent to our visit, we were informed that BLM rerouted Route 110 and installed a fence to prevent OHV users from using the closed portion of the trail that previously crossed the tailings pile. However, BLM has not installed fencing around the entire tailings pile to prevent OHV vehicles from accessing other parts of the tailings adjacent to the trail and has not installed signs warning of the specific dangers associated with the arsenic contamination.



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BLM Rt. 110 Before and After OIG Visit



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EXPOSURE TO EMPLOYEES

BLM employees who visit the District also risk exposure to high arsenic contamination levels that could potentially affect their health. BLM prepared a Site Safety and Health Plan to protect employees and subcontractors from potential hazards in the District that included medical monitoring of project personnel and air monitoring during work activities. However, this plan has not been fully implemented.

CONCLUSION

The Bureau of Land Management needs to take timely action to protect the health and safety of the public and employees from exposure to arsenic and other mining hazards in the Rand Mining District. While BLM has prepared planning documents, we are concerned that planned actions have not been fully implemented. For example, many actions planned for FY 2007 have not yet been implemented.

RECOMMENDATIONS

To protect the public and employees from hazards in the Rand Mining District, we recommend the Assistant Secretary, Land and Minerals direct BLM to:

1. Implement community relations activities, consistent with the Project Management Plan. These activities should include providing written notification to all District residents alerting them of the arsenic contamination and conducting periodic public education and outreach activities.
2. Reduce or eliminate existing arsenic exposure to recreational users consistent with the Project Management Plan. Actions should include promptly installing fencing around the entire tailings pile accessible from Route 110 to restrict access to OHV users and post signs warning of the arsenic contamination.
3. Promptly install fencing around hazardous mine features consistent with the Action Memorandum.
4. Promptly install air monitoring systems consistent with the Action Memorandum and Project Management Plan.
5. Consult with BLM's health and safety office and/or the Department's Office of Occupational Health and Safety, the Office of the Solicitor, and the Department's environmental experts to promptly determine and implement the appropriate testing and monitoring required for privately owned properties located within the Rand Mining District for use in Remedial Investigation/Feasibility Study process.
6. Implement medical monitoring and air monitoring of work activities consistent with the Site Health and Safety Plan.

This flash report is being issued to notify both Departmental and bureau management of serious health and safety issues that we found so that immediate action can be taken. We visited the District as part of our audit to determine if the Department of the Interior and its bureaus have adequate AML programs to protect public health and safety. While we have not completed this audit, we wanted to bring these serious health and safety issues to your attention. Our Department-wide audit report will address some of the more comprehensive factors that contributed to these health and safety deficiencies. The Department-wide audit is being done in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

Please provide us with your written comments to this report and a summary of actions taken or planned by **October 11, 2007**. Please address your response to:

Ms. Anne L. Richards
Assistant Inspector General for Audits
U.S. Department of the Interior
Office of Inspector General
1849 C Street, NW, MS 5341
Washington, D.C. 20240

If you have comments or questions about this report, please contact me at (202) 208-5745.

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