



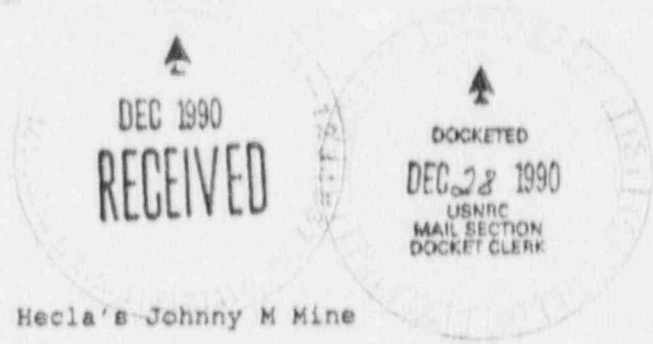
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202-2733

RETURN ORIGINAL TO PDR, HQ.

DEC 20 1990

Mr. Gary Gamble  
Hecla Mining Company  
6500 Mineral Drive  
Box C-8000  
Coeur d'Alene, Idaho 83814-1931



Re: NESHAP's Radon-222 Emissions Testing at Hecla's Johnny M Mine

Dear Mr. Gamble:

This is in response to your letter of November 9, 1990, to Mr. Hank May of my staff. Your letter requests EPA's concurrence that Hecla's Johnny M mine site need not be monitored for radon-222 emissions, per 40 CFR Part 61, Subpart T.

As outlined in your letter, the Johnny M was a uranium mine backfilled with uranium mill tailings from Kerr-McGee's mill located at Ambrosia Lake. The site has been undergoing reclamation clean-up. Although initial reclamation efforts were completed in 1981, there are still some residual tailings contamination at some mine surface areas. A reclamation plan approved by the Nuclear Regulatory Commission on October 10, 1990, provides for removal and disposal of the residual tailings contaminated soil at the Quivira Mining Company's Ambrosia Lake Mill. The removal and disposal of these materials is presently anticipated to be conducted during 1991.

Based upon the information provided in your letter, the Johnny M mine site may be considered as "land contaminated with residual radioactive materials from inactive Uranium processing sites" rather than a Uranium mill tailings disposal site. Monitoring for radon-222 emissions per 40 CFR Part 61, subpart T is, therefore, not required for the site.

Please be advised that the above discussion only addresses the requirements of the Radionuclide NESHAP at 40 CFR Part 61, Subpart T. The opinions expressed in this letter in no way affect approvals or activities required by other applicable requirements of 40 CFR or other Federal or state regulatory authorities.

We appreciate being informed of Hecla's plans to clean up the contaminated soils at the Johnny M mine site.

Sincerely yours,

Original signed by:

9101150139 901220  
PDR ADOCK 04008914  
P PDR

John R. Hepola  
Chief  
Air Enforcement Branch (6T-E)

DESIGNATED ONLY

cc: Mr. Jack Elvinger  
Air Quality Bureau, NMEID

Certified By *Mary C. Hank*

Mr. Ramon E. Hall ✓  
NRC, Uranium Recovery Field Office

DF02  
91-0165-10