

Atlantic Richfield Company

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July 6, 2009

CERTIFIED – RETURN RECEIPT REQUESTED

Ms. Nadia Hollan Burke
Remedial Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street, SFD-8-2
San Francisco, CA 94105

**Subject: June 2009 Monthly Report, Yerington Mine Site, Lyon County, Nevada:
Administrative Order for Remedial Investigation and Feasibility Study, EPA Docket
No. 9-2007-0005 and EPA Docket No. 09-2009-0010**

Dear Ms. Hollan Burke:

Pursuant to the above referenced orders issued by the U.S. Environmental Protection Agency – Region 9 (EPA), please note the following monthly status report for Atlantic Richfield Company (ARC) RI/FS and removal action activities at the Yerington Mine Site (Site) during June 2009.

June 2009 Activities

Operations, Maintenance and Site Security

- Continued routine Site O&M, security and bird deterrent activities including operation of the propane cannons for the Arimetco ponds (except the VLT Pond; bird mitigation at the VLT pond continues in accordance with revised EPA & USFWS guidelines). Desert engineering personnel assisted with ongoing O&M and bird mitigation activities.
- The shutdown of the pumpback well system (PWS) continued. PWS evaporation pond levels: North Cell <1.00 feet (minimum staff gauge level recorded April 16, 2009); Middle Cell = 0 feet; South Cell < 0.1 feet. Uncorrected pan evaporation for the month of June was 9.96 inches and the Site received 0.93 inches of precipitation.
- Arimetco heap leach fluid management system (FMS): 1) Total estimated gallons transferred from VLTSP Pond to Evaporation Pond = 0 gallons; SSP to Evaporation Pond = 60,000 gallons; Phase 1 Pond to Evaporation Pond = 0 gallons; 2) Pond levels: Phase 1 Pond = <1.0 foot; Evaporation Pond = 5 feet; VLT Pond = 7.5 feet; Slot 2 Pond = 15 feet.
- Completed permanent fence and gate repairs along Burch and Luzier Lanes. Completed subsequent temporary fence repairs due to a traffic accident along Burch Road across from the front gate.
- Pulled the pumps and flow meters from the pumpback wells. Cleaned, serviced and placed the equipment in storage. Pump conditions were assessed for required repairs and improvements prior to a return to service. Flushed the PWS discharge lines.

A BP affiliated company



May 2009 Activities - Continued

Other Site Activities

- Fawcett Electric was on Site June 1 to repair the slot transfer pump.
- Roy Shipes (Arimetco) was on Site June 5 with Western Utah Copper Company (WUCC) to inspect former Arimetco equipment. Ilka Dinkelman (CH2M Hill) was on Site June 5 to locate monitor wells, inspect the Slot Pond leak, and participate in the Arimetco tour.
- Lyon County Fence was on Site June 8-11 for gate and fence repairs.
- Tom Dunkelman (EPA) was on Site June 10.
- Joe Sawyer (NDEP) was on site June 19 with Stan Levers (BVNC, a demolition company).
- Ilka Dinkelman (CH2M Hill) was on Site June 24 to lead a tour with WUCC personnel.
- Comstock Inspection was on Site June 26 for ground clearance associated with upcoming power pole replacement and road grading activities.

Site Characterization

- Site-wide monthly groundwater elevation measurements were obtained on June 23-24.
- A pit lake elevation of 4218.53 feet amsl was recorded on June 23 from the pressure transducer, an increase of 0.07 feet over a 30 day period (since May 23) and an increase of 2.89 feet in the past year (since June 23, 2008).
- 2Q 2008 groundwater monitoring continued through June 10, including on- and off-Site monitor wells and annual domestic well sampling of 21 wells at off-Site residences (three residences did not respond to the notification of proposed sampling).
- An additional 23 homes (of 30 contacted) along Locust Drive and Luzier Lane (west and north of the Site boundary, respectively) agreed to participate in a quarterly domestic well sampling program related to the planned 1-year shutdown of the PWS. The domestic wells were sampled June 16-18. Prior to sampling, access agreements were received from the 23 home owners. This domestic well sampling activity was volunteered by ARC at the May 28 Stakeholders' Meeting.
- Continued compilation of 1Q 2009 groundwater monitoring data for inclusion in the quarterly monitoring report, which will include the monitor well construction information for the nine new wells installed as part of the PWS Shutdown Work Plan.
- Continued monthly monitoring and the evaluation of groundwater data generated from the PWS Shutdown Work Plan and the Shallow Zone Work Plan.
- Continued meteorological monitoring at the AM-6 location. Conducted the semi-annual met station calibration.
- Submitted the Anaconda Evaporation Ponds Removal Action Characterization Data Summary Report to EPA on June 12, 2009 (also see AOC removal actions section).
- Implemented modifications to the Conceptual Site Model (CSM) based on EPA and Yerington Paiute Tribe (YPT) comments. Given that YPT comments on the CSM requested an evaluation of plants related to tribal lifeways, submitted a letter to YPT on June 16 describing an approach to developing the appropriate plant list.
- Submitted responses to EPA and YPT comments (dated April 13, 2009) on the Draft Process Areas (OU-3) Remedial Investigation Work Plan (dated August 30, 2007) on June 9.
- Submitted responses to EPA and YPT comments (dated May 21, 2009) on the Air Quality Monitoring Data Summary Report (AQM DSR dated January 30, 2009) and the Work Plan for the Human Health Risk Assessment for the Inhalation Pathway (HHRA Work Plan dated January 30, 2009) on June 18.
- Continued Site wildlife surveys.

AOC Removal Actions

- Continued preliminary engineering activities associated with the removal action for the inactive Anaconda Evaporation Ponds. Black Eagle Consulting completed geotechnical investigations for the design elements associated with the evaporation ponds removal action and the landfill to be constructed in the sulfide tailings area. Geotechnical testing of VLT samples continued at the DB Stephens Laboratory (Albuquerque, NM).
- Completed and submitted work plans for the following SOW deliverables: 1) draft Site O&M Plan (dated June 9, 2009); 2) draft Potential Electrical Hazards Work Plan (dated June 12, 2009, re-submittal of preliminary draft work plan); 3) draft Evaporation Ponds Removal Action Design Work Plan (dated June 12, 2009; attached to the Anaconda Evaporation Ponds Removal Action Data Summary Report); 4) draft Process Areas MARSSIM Characterization Work Plan (dated June 17, 2009); and 5) final Transite Pipe Removal Action Work Plan (dated June 30, 2009 including responses to EPA comments on the draft work plan received from EPA on June 15).

Site Issues

- Non-Routine pumping continues from the Slot Pond Leak detection sump at a rate of approximately 1.2 gallons per minute (no surface expression of leak evident).
- Continued operation of SSP Pump at reduced capacity while parts are located for implementing assessment and repairs. Repaired Slot 2 Pond transfer pump.
- Secured parts and vendor for repairing power pole for the VLT service line.
- The PVC casing in monitor well 4I was observed to be broken, and will be manually repaired. Once repaired, the measurement point on the casing will be re-surveyed and the pressure transducer data logger will be re-installed and calibrated against a manual water level measurement.

Planned July/August 2009 Activities

- Continue routine O&M, site security and modified bird deterrent activities.
- Continue engineering activities associated with the removal action for the inactive Anaconda Evaporation Ponds, including Sub-Area A, and the design for the on-Site landfill for the management of transite pipe and other Site C&D materials.
- Respond to comments to the draft versions, and prepare final versions of the following AOC/SOW deliverables: 1) Site O&M Plan; 2) Potential Electrical Hazards Work Plan; 3) Evaporation Ponds Removal Action Design Work Plan; and 4) Process Areas MARSSIM Characterization Work Plan.
- Upon EPA approval of the final Transite Pipe Removal Action Work Plan, perform transite pipe inspection and characterization activities including the sampling and analysis of pipe materials and radiometric survey.
- Submit the 1Q 2009 Groundwater Monitoring Report, including well construction information for nine new monitor wells associated with the PWS. Continue monitoring and data compilation, and initiate the data summary report for the shallow zone characterization and PWS assessment.
- Continue groundwater elevation and pit lake level monitoring. Conduct quarterly monitoring of domestic wells, as described above. Continue meteorological monitoring at AM-6.
- Meet with EPA to: 1) discuss Site technical issues including Work Plans for the Site-Wide Groundwater OU and the Process Areas OU; 2) deliverable dates for revisions to the CSM, the AQM DSR and the HHRA Work Plan; and 3) non-technical Site issues (e.g., upcoming public meeting format and technical assistance plan).

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If you have any questions or comments, please feel free to contact me at (661) 287-3855 or via e-mail at Roy.Thun@bp.com.

Sincerely,

A handwritten signature in black ink that reads "John Batchelder for". The signature is written in a cursive, flowing style.

Roy Thun
Environmental Business Manager

cc: Dave Seter, EPA – via electronic mail
Mike Montgomery, EPA – via electronic mail
Roberta Blank, EPA – via electronic mail
Andrew Helmlinger, EPA – via electronic mail
Tom Dunkelman, EPA – via electronic mail
Joe Sawyer, NDEP – via electronic mail
Tom Olsen, BLM – via electronic mail
Dan Newell, City of Yerington – via electronic mail
Phyllis Hunewill, Lyon County Commissioner – via electronic mail
Dennis Stark, Lyon County Manager – via electronic mail
Justin Whitesides, YPT – via electronic mail
Chairman Emm, YPT – via electronic mail
Dietrick McGinnis, McGinnis and Associates – via electronic mail
Chairman Reymus, WRPT – via electronic mail
Roxanne Ellingson, WRPT – via electronic mail
Chris Winsor, Atlantic Richfield Company - via electronic mail
James Lucari, Atlantic Richfield Company – via electronic mail
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Rich Curley, Curley and Associates, LLC – via electronic mail
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