

Atlantic Richfield Company

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September 5, 2012

CERTIFIED – RETURN RECEIPT REQUESTED

Ms. Jere Johnson
Remedial Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street, SFD-9-1
San Francisco, CA 94105

Subject: August 2012 Monthly Report, Yerington Mine Site, Lyon County, Nevada: Administrative Order for Remedial Investigation and Feasibility Study (RI/FS), CERCLA Docket No. 9-2007-0005; Administrative Order on Consent, CERCLA Docket No. 09-2009-0010

Dear Ms. Johnson:

Pursuant to the above referenced orders issued by the U.S. Environmental Protection Agency - Region 9 (EPA), Atlantic Richfield Company (ARC) has prepared this August 2012 monthly report for RI/FS and Operations and Maintenance (O&M) activities at the Yerington Mine Site (Site).

August 2012 Activities

Site Security and O&M Activities

- Continued routine Site O&M, security and bird deterrent activities. Security cameras at various locations (e.g., Main and Arimetco gates, entrances to buildings) indicated no activity of concern.
- “Wind Dancers” were operated at the Slot Pond, the Pumpback Well System (PWS) Pond, and the Lined Evaporation Pond. Propane cannons were operated at the Arimetco Fluid Management System (FMS) ponds (with the exception of the VLT Pond, as directed by EPA). Locations of “Wind Dancers” and bird deterrent flags were rotated every two weeks, or as field observations dictated, to lessen the possibility of birds becoming habituated to these deterrents. In keeping with the Bird Mitigation SOP, and as a result of the evaporation of water in the pumpback and lined evaporation ponds, bird guard towers A, B and C have been turned off for the duration of the dry season. Start/stop times on all propane cannons continued to be adjusted to reflect the changing timing of sunrise and sunset.
- On August 20, Site personnel noted that three fence posts located approximately 100 yards east of the Arimetco gate were bent (approximately 25-degree angles), likely the result of weekend vehicular traffic. Site personnel contacted, and assisted, SPS in straightening the fence posts.
- Water levels in all PWS Evaporation Pond cells continued to remain at 0 feet.
- Arimetco FMS pond levels: Phase 1 Pond = 3.23 feet; FMS Evaporation Pond = 8.96 feet; VLT Pond = 1.42 feet; Slot 2 Pond = 4.52 6 feet. Approximately 350,417 gallons of solution were pumped from the VLT Pond to the FMS Evaporation Pond. No transfers from the Slot Pond occurred. Approximately 26,297 gallons of solution were pumped from the leak detectors in August (primarily from SD1), bringing the cumulative 2012 total to 279,044 gallons. The VLT Pond leak detector continued to be inactive through August (see attached monitoring data).

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August 2012 Activities - Continued

Site Security and O&M Activities - Continued

- The remaining freeboard in the FMS Evaporation Pond at the end of August was approximately 1.17 feet. Combined drain-down from all Arimetco heap leach pads (HLPs) averaged approximately 10.5 gallons per minute (gpm) in August (see attached monitoring data).
- The VLT Pond flow meter, which records fluid transfers to the FMS Evaporation Pond, started to malfunction on August 29. The flow meter will remain inoperative until after EPA completes the re-construction of the VLT Pond, and will be repaired or replaced ahead of the completion of the EPA re-construction to allow flows to be monitored after the pond is returned to service.
- A semi-annual FMS monitoring event occurred on August 22, which included the collection of liquid and solid samples from the FMS ponds.

Other Site Activities

- B.V. Nevada personnel continued with demolition and salvage activities.
- ARC continued to assess potential locations for an evaluation of the feasibility of Site-wide radio communications

Site Characterization Activities

- Monthly groundwater elevation measurements were obtained August 28-30.
- The Pit Lake pressure transducer was re-calibrated on August 5, 2012 to reflect an increase of 0.028 feet as determined by the survey performed in July.
- A pit lake elevation of 4228.338 feet amsl was recorded on August 28 from the re-calibrated pressure transducer, an increase of 0.002 feet since July 23, 2012. The pit lake elevation has risen 2.382 feet since August 28, 2011
- No changes to the domestic well sampling program occurred in August.
- No changes to the Bottled Water Program occurred in August.
- Transmitted the 1Q 2012 Domestic Well Monitoring Report (DWMR) dated August 16, 2012 and the 1Q 2012 Groundwater Monitoring Report (GMR) dated August 22, 2012.
- Continued the compilation of data and the preparation of the 2Q 2012 DWMR and GMR.
- Performed the 3Q groundwater monitoring event August 5-21.
- Continued the compilation of field and laboratory data associated with the 2011 Monitor Well program, and the preparation of the Data Summary Report.
- Transmitted the SOPs for aquifer solids testing on August 17, 2012 for EPA review.
- Continued the preparation of the revised Site-Wide Groundwater Operable Unit (OU-1) Remedial Investigation (RI) Work Plan including data quality objectives and appendices.
- Transmitted a technical memorandum for EPA and project stakeholder review on August 15, 2012 that described the objectives for groundwater modeling at the Site.
- Attended a groundwater technical meeting on August 28-29 with EPA, the Yerington Paiute Tribe (YPT) and other project stakeholders to: 1) discuss ARC preliminary responses to EPA comments on four previous groundwater-related transmittals (BGQA, 2010 DSR, Public Information Tech Memo and Initial Bedrock Characterization); 2) groundwater modeling objectives; and 3) the Groundwater RI Work Plan.
- Continued the preparation of responses to comments and figure modifications as per EPA comments on the Technical Memorandum - Revision 2 for the Process Areas (OU-3) Sub-Surface Utility and Dry Well Geophysical Investigation Results for Phase I Activities.
- Routine database management activities and support of Site investigations and reports. Developed field sampling forms for the 3Q 2012 domestic well monitoring event.
- Presented information on the project database to EPA and YPT on August 14, and discussed EPA comments dated July 12, 2012. Initiated responses to EPA comments on the project database, and developed a preliminary list of action items resulting from the August 14 meeting.

Planned September/October 2012 Activities

Site Security and O&M Activities

- EPA will re-construct the VLT Pond.
- Continue routine Site O&M, security and bird deterrent activities.
- Perform bird observation training.
- Ship approximately 10 cubic yards of petroleum-contaminated soils to the US Ecology landfill in Beatty NV as non-hazardous non-DOT regulated solid waste resulting from implementation of the VLT Transformer soil cleanup and the Process Areas sub-surface utility/dry well investigation.

Site Characterization Activities

- Continue groundwater elevation and pit lake level measurements, and meteorological monitoring.
- Continue the Bottled Water Program.
- Transmit the 2Q 2012 GMR and DWMR.
- Prepare for, and conduct, the 3Q 2012 domestic well monitoring event in September. Compile field and laboratory data for the 3Q 2012 domestic well and groundwater monitoring events. As appropriate, discuss with EPA the preliminary responses to EPA comments on the 2010 Monitor Well and Ag Fields Data Summary Report (DSR). Initiate responses to EPA comments on the Aquifer Test DSR dated April 19, 2012.
- Complete and transmit the 2011 Monitor Well DSR to EPA.
- Continue the compilation of information for inclusion in the revised Groundwater RI Work Plan.
- When available, review EPA's draft data quality objectives for the Arimetco areas of investigation associated with the Site-Wide Groundwater RI Work Plan.
- Transmit responses to EPA comments dated June 14, 2012 on the Process Areas Sub-Surface Utility and Dry Well Geophysical Investigation Tech Memo, and requested figure modifications.
- When available, review EPA's draft Process Areas (OU-3) RI Work Plan and data quality objectives for the Wabuska Drain (OU-7) RI Work Plan.

Please contact me at (714) 228-6774 or via e-mail at jack.oman@bp.com if you have any questions or comments about the August 2012 monthly report.

Sincerely,



Jack Oman
Project Manager

Attachment

cc: Dave Seter, EPA – via electronic mail
Roberta Blank, EPA – via electronic mail
Andrew Helmlinger, EPA – via electronic mail
Tom Dunkelman, EPA – via electronic mail
Greg Lovato, NDEP – via electronic mail
Tom Olsen, BLM – via electronic mail
Dan Newell, City of Yerington – via electronic mail
Phyllis Hunewill – via electronic mail
Virgil Arellano, Lyon County Commissioner – via electronic mail
Rob Loveberg, Lyon County Planning Department – via electronic mail
Tom Grady, Nevada State Assembly – via electronic mail
Jim Sanford, MVEC – via electronic mail

Lauryne Wright, YPT – via electronic mail
Chairwoman Howard, YPT – via electronic mail
Dietrick McGinnis, McGinnis and Associates – via electronic mail
Tom Bowden, Ridolfi, Inc. – via electronic mail
Chairwoman McFalls, WRPT – via electronic mail
Tad Williams, WRPT – via electronic mail
Ron Halsey, Atlantic Richfield Company – via electronic mail
James Lucari, Atlantic Richfield Company – via electronic mail
Marc Ferries, Atlantic Richfield Company – via electronic mail
Brian Johnson, Atlantic Richfield Company – via electronic mail
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