

Atlantic Richfield Company

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October 3, 2008

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: September 2008 Monthly Report, Yerington Mine Site, Lyon County, Nevada:
Administrative Order for Remedial Investigation and Feasibility Study, EPA Docket
No. 9-2007-0005**

Dear Ms. Hollan Burke:

Pursuant to the above referenced order issued by the U.S. Environmental Protection Agency – Region 9 (EPA), please note the following monthly status report for Atlantic Richfield Company (ARC) activities at the Yerington Mine Site (Site) during September 2008.

September 2008 Activities

Operations, Maintenance and Site Security

- Continued routine Site O&M and security activities.
- Pumpback well system (PWS) averaged approximately 61 gpm. All 11 wells operated 24/7 with minor downtime for preventive maintenance (PW-4, PW-5, and PW-7). PWS evaporation pond levels: north cell = 1.62 feet; middle cell = <0.1 feet; south cell = <0.1 feet. Pond liner inspection performed September 25.
- Arimetco heap leach fluid management system (FMS): 1) Total estimated gallons transferred from VLT Pond to Evaporation Pond = 69,000 gallons; Slot 2 Pond to SSP = 36,600; SSP to Evaporation Pond = 198,000 gallons; Raff sump to Phase 1 Pond = 0; Phase 1 Pond to Evaporation Pond = 0 gallons; 2) Pond levels: Evaporation Pond = 4 feet; VLT Pond = 3.5 feet; Slot 1 Pond = dry; Slot 2 Pond = 13.25 feet; 3) EPA removal Action: Phase I Pond under re-construction; Raff 1, Raff 2 and Plant Feed ponds eliminated; and Mega Pond decommissioning in progress.
- Bird mitigation plan activities included selection of pyrotechnic launcher, airsoft soft pellet rifle, and the procurement of the Bird Gard deterrent call equipment. Demonstration and training of the Bird Gard system occurred on September 24.

Other Site Activities

- EPA and EQM (construction sub-contractor) initiated FMS pond removal actions on September 8.
- Art Gravenstein, Lisa Johnson and Joe Sawyer (NDEP) reviewed FMS removal actions with Tom Dunkelman (EPA) September 25.

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September 2008 Activities - Continued

Site Characterization

- Conducted the third quarter (3Q 2008) Site-wide groundwater monitoring event from September 7 through September 16. Three wells (USEPA-2S, B/W-1S, B/W-28S) were not sampled due to a lower water table and dry well (i.e., water table dropped below the screen intervals for these wells). Two wells (MW-1, B/W-25D) were not sampled due to damaged pumps and/or discharge lines. Water quality samples were submitted to TestAmerica laboratories for the standard analytical suite. Site-wide monthly groundwater elevation measurements were obtained on October 1 and 2 (delayed one week). Initiated temperature measurements in Site monitor wells.
- The 2Q 2008 Groundwater Monitoring Report was submitted to EPA on September 11. The report included results from the quarterly sampling of Site monitor wells and the annual sampling of select domestic wells.
- The pit lake pressure transducer, after being pulled on July 15 due to erratic readings, was returned from the manufacturer and reinstalled on September 12 (the manufacturer was not able to determine the source of the erratic data). ARC confirmed that the unit was accurately recording pit lake levels using the surveyed staff gages installed along the north ramp of the pit. The pit lake water level, measured on 9/24 was 4,215.85 feet amsl.
- Six domestic wells were sampled at the request of homeowners to determine if they qualify for the bottled water program. Three homeowners with wells that exceed 25 ug/L uranium were added to the bottled water program, and three did not qualify.
- Provided responses to EPA comments on the draft Background Soils Data Summary Report and submitted a revised Background Soils Data Summary Report dated September 5, 2008.
- Continued review of the Public Review Draft Remedial Investigation Report Arimetco Facilities Operable Unit 8, Anaconda Copper Yerington Mine and the Anaconda Mine Radiation Assessment Letter Report.
- Continued to work with EPA to finalize the Quality Assurance Project Plan (QAPP) for the Site.
- Responded to EPA comments on the draft Anaconda Evaporation Ponds Removal Action Characterization Work Plan to EPA (dated August 22, 2008) and submitted a 'final' version of the Work Plan to EPA on September 15, 2008. Subsequently, based on EPA's review of the 'final' Work Plan, ARC provided select revised pages and figures via e-mail on September 26.
- Continued the compilation, geochemical modeling and statistical analysis of Second-Step Hydrologic Framework Assessment (HFA) data for inclusion in the Data Summary Report (DSR) to be submitted mid-October 2008.
- Conducted the quarterly data management audit on September 24.
- Continued Site wildlife surveys.

Planned October-November 2008 Activities

- Continue routine O&M and site security activities.
- Conduct training and testing of pyrotechnic launcher and airsoft soft pellet rifle, and position Bird Gard deterrent call units. Implement the Mitigation Plan for Deterring Birds from Lined Evaporation and Pumpback Ponds by October 31.
- Continue meteorological monitoring at AM-6.
- Continue groundwater elevation and pit lake level monitoring. Continue temperature measurements in Site monitor wells. Compile 3Q 2008 Site-wide groundwater monitoring data.
- Initiate field activities associated with the Anaconda Evaporation Ponds Removal Action Characterization Work Plan on October 4.

Planned October-November 2008 Activities - Continued

- Submit the Second Step HFA DSR by October 15. Attend groundwater technical meeting in mid-November. Initiate work on the revised Site-Wide Groundwater RI Work Plan.
- Submit comments to EPA on the Public Review Draft Remedial Investigation Report Arimetco Facilities Operable Unit 8, Anaconda Copper Yerington Mine, and the Anaconda Mine Radiation Assessment Letter Report.
- As received, respond to EPA comments on previous submittals required under the Order and attached SOW (e.g., Draft Groundwater RI, Process Areas RI and Draft Pit Lake RI Work Plans, Draft Site-Wide Groundwater Monitoring Plan).

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,



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cc: Dave Seter, EPA – via electronic mail
Mike Montgomery, EPA – via electronic mail
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