

Atlantic Richfield Company

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November 9, 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: October 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 October 2012 monthly report for RI/FS and Operations and Maintenance (O&M) activities at the Yerington Mine Site (Site).

October 2012 Activities

Site Security and O&M Activities

- Continued routine Site O&M, security and bird deterrent activities with the exception of the VLT Pond, as directed by EPA. Security cameras at various locations (e.g., Main and Arimetco gates, entrances to buildings) indicated no activity of concern.
- The Wind Dancer at the Slot Pond remained in service, while the Wind Dancer at the Pumpback Well System (PWS) Pond and the Lined Evaporation Pond (LEP) were not active in October. 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 remained inactive. Start/stop times on all propane cannons continued to be adjusted to reflect the changing timing of sunrise and sunset.
- Water levels in all PWS Evaporation Pond cells continued to remain at 0 feet. Arimetco FMS pond levels: Phase 1 Pond = 3.21 feet; FMS Evaporation Pond = 9.02 feet; VLT Pond = 2.67 feet; Slot 2 Pond = 5.4 feet. Freeboard in the FMS Evaporation Pond was at 1.11 feet as of October 31. No fluid transfers occurred in October.
- EPA completed re-constructing the VLT Pond but has retained operational and monitoring control during the close-out period to re-establish electrical, pumping and monitoring systems to return the pond to substantially complete operational status.
- Approximately 33,097 gallons of solution were pumped from the leak detectors in October (primarily from SD1), bringing the cumulative 2012 total to 340,164 gallons (see attached monitoring data). Monitoring of leak detectors VLTP1 and VLTD1 remained under EPA control during the VLT Pond repair and close-out periods.

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October 2012 Activities - Continued

Other Site Activities

- B.V. Nevada personnel continued with demolition and salvage activities.
- Desert Engineering performed routine road maintenance activities October 22-25.

Site Characterization Activities

- Monthly groundwater elevation measurements were obtained October 29-31.
- A pit lake water elevation of 4228.164 feet above mean sea level (amsl) was recorded on October 29, 2012 from the pressure transducer, a decrease of 0.166 feet since September 25, 2012. The pit lake elevation has risen 2.129 feet since October 29, 2011.
- One new residence (DW-197) was added to the domestic well monitoring program. Access agreements were transmitted to one new residence (DW-199) and to the new owner of DW-89 (the status of access agreements is "pending" for new residences at DW-196 and DW-198).
- Two residences were added to the Bottled Water Program: 1) DW-92 that became eligible in April 2012; and 2) DW-89, with a new owner.
- Transmitted the 2Q 2012 Groundwater Monitoring Report (GMR) dated October 25, 2012.
- Prepared for the 4Q 2012 domestic well sampling event to be conducted in November.
- Completed 4Q 2012 groundwater monitoring activities in mid-October.
- Continued the preparation of responses to comments and revisions to the Aquifer Test DSR dated April 19, 2012 based on EPA comments received August 2, 2012.
- Continued the preparation of the revised Site-Wide Groundwater Operable Unit (OU-1) Remedial Investigation (RI) Work Plan.
- Completed revisions to the Background Groundwater Quality Assessment (BGQA) in response to EPA comments that were discussed during the August 29-30, 2012 technical meeting (the revised BGQA is an attachment to the revised Groundwater RI Work Plan).
- Completed and transmitted to EPA the Draft 2011 Monitor Well Installation Data Summary Report (2011 DSR) dated October 3, 2012.
- Completed and transmitted to EPA the letter describing Proposed Initial Bedrock Characterization Activities dated October 11, 2012 based on discussions from the groundwater technical meeting held August 28-29. EPA approved the letter on October 22, 2012.
- On October 15, 2012, the revised Aquifer Solids Testing Standard Operating Procedures (SOPs) document dated September 27, 2012 was transmitted to EPA. EPA approved the revised SOPs on October 30, 2012 providing that three minor edits be incorporated into the final version.
- Completed and transmitted to EPA a revised technical memorandum dated October 15, 2012 that described the objectives and approach for groundwater modeling at the Site based on discussions from the groundwater technical meeting held August 28-29. EPA approved the technical memorandum on October 26.
- Continued coordination and tracking of hydrologic tracer data from the 2Q 2012 sampling event.
- Continued the preparation of responses to comments and figure modifications 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.

Planned November/December 2012 Activities

Site Security and O&M Activities

- Assume responsibility for the FMS after EPA completes close-out activities for the VLT Pond.
- Continue routine Site O&M, security and bird deterrent activities.
- 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.

Planned November/December 2012 Activities - Continued

Site Characterization Activities

- Continue groundwater elevation and pit lake level measurements, and meteorological monitoring.
- Continue the Bottled Water Program.
- Compile field and laboratory data for the 3Q 2012 domestic well and groundwater monitoring events, and transmit the 3Q 2012 domestic and groundwater monitoring reports. Initiate the compilation of data associated with the 4Q 2012 domestic and groundwater monitoring events.
- Complete and transmit the revised Groundwater RI Work Plan.
- Continue preparation of the Groundwater Model Work Plan for transmittal to EPA in early 2013.
- Transmit responses to EPA comments dated June 14, 2012 on the Process Areas Sub-Surface Utility and Dry Well Geophysical Investigation Technical Memorandum, 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 October 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
John Batchelder, EnviroSolve – via electronic mail
Jim Chatham, Atlantic Richfield Company – via electronic mail
Rich Curley, Curley and Associates, LLC – via electronic mail

Ms. Jere Johnson
Yerington Monthly Report
November 9, 2012
Page 4 of 4

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