

Atlantic Richfield Company

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May 5, 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: April 2009 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 April 2009.

April 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. Use of the VLT propane cannon was suspended per the results of an EPA and USFWS site visit (March 24) and subsequent correspondence.
- Pumpback well system (PWS) was not operated after the shutdown was implemented in late March. PWS evaporation pond levels: North Cell < 1.00 feet (minimum staff gauge level recorded April 16, 2009); Middle Cell = 1.03 feet; South Cell = 1.37 feet. ARC plans to let the PWS evaporation pond cells go dry through the remainder of 2009.
- Arimetco heap leach fluid management system (FMS): 1) Total estimated gallons transferred from VLTSP Pond to Evaporation Pond = 132,000 gallons; SSP to Evaporation Pond = 0 gallons; Phase 1 Pond to Evaporation Pond = 0 gallons; 2) Pond levels: Phase 1 Pond = <1.0 foot; Evaporation Pond = 5.5 feet; VLT Pond = 9.5 feet; Slot 2 Pond = 15 feet.

Other Site Activities

- Tom Dunkelman (EPA) was on Site April 16.
- Nadia Hollan-Burke, Roberta Blank and Margot Perez-Sullivan (EPA) were on Site April 28 to conduct a tour with representatives from CH2M Hill, BLM, Yerington Community Action Group, Bristol Bay, Great Basin Resource Watch, Nondalton Tribal, Kokhanak Village, Pedro Bay Village, Togiale, The Wilderness Society, Naknek, Felt Soul Media, Frontier Media Arts, Earthworks, and the Yerington Paiute Tribe.
- Site Technical and O&M personnel completed the Smith System Driving Course on April 28-29.

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April 2009 Activities - Continued

Site Characterization

- Site-wide monthly groundwater elevation measurements were obtained on April 23, 24 and 27.
- A pit lake elevation of 4218.28 feet amsl was recorded on April 30 from the pressure transducer, an increase of 0.34 feet over a 4-week period (since March 31) and an increase of 3.15 feet in the past year (since April 30, 2008).
- Continued meteorological monitoring at the AM-6 location.
- Continued preliminary risk calculations associated with the inhalation pathway for a baseline human health risk assessment.
- Initiated responses to EPA comments on, and revisions to, the Site-wide Quality Assurance Project Plan (QAPP; Revision 4) dated November 12, 2008.
- Initiated responses to EPA and Yerington Paiute Tribe (YPT) comments on the Conceptual Site Model (CSM; Revision 3) dated January 30, 2009.
- Initiated responses to EPA and YPT comments on the Draft Process Areas (OU-3) RI Work Plan dated August 30, 2007 including a Site visit and review of Site files.
- Continued management of field activities associated with the PWS and Shallow Zone groundwater characterization activities including procedures to address high turbidity/precipitates in unfiltered samples, the preparation of progress reports and coordination with EPA oversight contractors (CH2M Hill and TetraTech) for split sampling. Prepared and submitted responses to EPA contractor (CH2M Hill) oversight report. Copper Environmental conducted a safety audit of the WDC and BC field crews.
- Continued updates to the project database, incorporating results from the groundwater characterization activities and associated quality control information.
- Continued the compilation and interpretation of field information and laboratory analytical data for the Anaconda Evaporation Ponds Removal Action Characterization Data Summary Report. Continued vadose zone modeling for the evaporation ponds.
- Continued Site wildlife surveys.

AOC Removal Actions

- The Administrative Order on Consent (AOC) and Associated Scope of Work (SOW) for removal actions at the Site was finalized (signed April 21; effective May 1).
- Continued preliminary engineering activities associated with the removal action for the inactive Anaconda Evaporation Ponds. Tri-State Surveying was on Site to survey the inactive Anaconda evaporation ponds for technical design support of the removal action. Black Eagle Consulting, with assistance from Desert Engineering, was on Site to conduct geotechnical field investigations for technical design support of the removal action.
- Initiated development of the following SOW deliverables: Site O&M Plan; Electrical Threats Work Plan; Transite Pipe Work Plan, Evaporation Ponds Removal Action Design Work Plan (attached to the Anaconda Evaporation Ponds Removal Action Data Summary Report); and the Process Areas MARSSIM Characterization Work Plan.

Site Issues

- Non-Routine pumping continues out of the Slot Pond Leak detection sump at a rate of approximately 1.2 gallons per minute.
- The Slot Pond propane cannon operation was reviewed and adjusted in response to residential complaints. ARC is currently evaluating the equipment to achieve greater reliability.

Planned May/June 2009 Activities

- Continue routine O&M, site security and modified bird deterrent activities. Modify the Slot Pond propane cannon to provide greater operational reliability.
- Continue meteorological monitoring at AM-6. Continue groundwater elevation and pit lake level monitoring. Conduct the 2Q 2009 quarterly monitoring event and associated annual domestic well sampling event. Continue PWS shutdown activities - pulling pumps out of the wells and inspecting, cataloging and storing the pumps.
- Complete the shallow zone characterization field work and continue monitoring associated with the PWS and Shallow Zone Characterization Work Plans. Submit a well construction (letter) report for the nine new monitor wells associated with the PWS. Initiate the data summary report.
- Respond to EPA comments on the Site-wide QAPP (Revision 4), and submit the revised QAPP. Respond to EPA comments on the Draft Process Areas (OU-3) Remedial Investigation Work Plan. Provide responses to EPA comments on the Site Conceptual Model (Revision 3).
- Continue engineering activities associated with the removal action for the inactive Anaconda Evaporation Ponds, including Sub-Area A. Initiate engineering activities associated with the on-Site landfill for the management of transite pipe and other Site C&D materials.
- Continue preparation of the following AOC/SOW deliverables: Site O&M Plan; Electrical Threats Work Plan; Transite Pipe Work Plan, Evaporation Ponds Removal Action Design Work Plan (attached to the Anaconda Evaporation Ponds Removal Action Data Summary Report); and the Process Areas MARSSIM Characterization Work Plan. Submit these deliverables to EPA in accordance with the SOW deliverable schedule.

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,



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
Chris Winsor, Atlantic Richfield Company – via electronic mail
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