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From: Johnson, Brian S
Sent: Wed 7/22/2015 9:03:34 PM
Subject: Notes and Action Items from the July 10th Yerington Meeting - AR Comments

Greg,

We appreciate your efforts in organizing the July 10th meeting and helping to focus the discussion around the key issues at the site, and your efforts in capturing the action items from the meetings. We have reviewed those action items and have two minor comments, both of which are underlined below. Your original text is shown in italics Please let me know if you have any questions with respect to these comments.

Sincerely,

Brian S. Johnson

Listed below are what NDEP captured as the main action items coming out of the meeting. Please review and provide any comments by replying to all by July 22.

Thanks,

Greg

1. To start the Feasibility Study process for Operable Unit 1 – Site wide groundwater, ARC will prepare a technical memo with proposed Remedial Action Objectives (RAOs) and General Response Alternatives (GRAs). ARC planned to review with their project team a schedule for

submitting this memo. RAOs and GRAs for OU-1 will also be discussed in general terms at the upcoming August 5 groundwater technical meeting.

2. The next EPA/NDEP/ARC management meeting will be scheduled for September. One area of focus at that meeting will be discussion of OU-1 Feasibility Study progress and next steps.

3. ARC will provide EPA and NDEP a summary list of the institutional control and other land use issues it has been trying to engage with BLM. EPA and NDEP will reach out to BLM to discuss these issues and next steps.

4. ARC will provide EPA and NDEP a copy of the deed restriction proposal previously sent to Singatse Peak Services.

5. In response to ARC June 30, 2015 letter to NDEP, NDEP will be preparing an outline of a site-wide settlement proposal. NDEP anticipates providing in mid-August.

6. NDEP will meet with Singatse Peak Services regarding their June 29, 2015 letter and the following topics:

a. *We have discussed with ARC and EPA potential funding sources for the SPS enhanced evaporation proposal. ARC has indicated it is* not looking to further increase its FMS-related activities, but may be *open to further discussion of their participation in funding an enhanced evaporation project in the context of an overall discussion about OU-8 FMS O&M responsibilities* if there is a substantial change in responsibility for current site management obligations.

b. From NDEP's perspective, additional information and demonstration to address potential O&M complications related to enhanced evaporation are needed from a pilot prior to negotiating agreements for additional sources of funding.

c. SPS perspective on deed restrictions proposed by ARC.

7. NDEP and EPA will confer on message related to NPL in advance of the August 6 public meeting. For reference, provided below is the message NDEP put together and discussed with EPA, AR, and SPS before the April 2015 public meeting.

"When Arimetco declared bankruptcy and walked away from the site in 2000, EPA, ARC, and NDEP, and then once they owned the site in 2011, Singatse Peak Services, have worked collaboratively to stabilize the Arimetco portion of the site. Collectively this group has provided funding for and conducted the following work:

- operation and maintenance of the fluid management system and associated reporting;

- removal of leaking evaporation ponds;

- evaporation pond system liner repair, replacement and other equipment upgrades;

- evaluations of short term fluid management options; and

- addition of fluid capacity.

These actions have brought the Arimetco portion of the site to a stable condition and we expect to have adequate fluid capacity for the next 4 years.

Concurrently with these actions, the group has worked on development of longer term solutions for the Arimetco areas, including completion of a Draft Final Feasibility Study by EPA in May 2012 and an updated Water Balance Analysis by ARC in 2014. Most recently NDEP has been developing a Conceptual Closure Plan and Cost Estimate for closing the Arimetco facilities in a manner consistent with mine closures required by Nevada mining regulations. We expect to have this plan completed in the 2nd quarter of 2015.

Once these studies are completed, we have adequate information to propose longer term solutions for the Arimetco site. We have also determined that construction of additional fluid capacity is not a good use of limited resources. At this stage we need to identify potential sources of funding in conjunction with proposing a longer term solution. Ultimately that longer term solution may include options that have not been fully considered in the Conceptual Closure Plan and may require additional analysis. As we continue exploring these options, we will keep the community updated on our progress.

IN RESPONSE TO ANY QUESTIONS ABOUT POTENTIAL FUNDING OPTIONS OR NPL:

At this stage we are still looking at a range of potential long term solutions. NDEP is in discussions with SPS and AR regarding their potential participation in these longer term solutions."