



YERINGTON PAIUTE TRIBE

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January 13, 2012

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Tribal Manager
Deborah Dunn
Secretary of Record
Shelley Pugh

Jane Diamond
Director
U.S. EPA Region IX
Superfund Division (SFD-1)
75 Hawthorne Street
San Francisco CA 94105

RE: Request for a study of the threat to area agriculture created by the Anaconda Mine Site (EPA #: NVD083917252).

Dear Ms. Diamond:

As a member of the Mason Valley agricultural community, the Tribe takes great pride in the quality of the farm product our ranching operation produces. Quality growth requires clean air, water and soil; a condition the Tribe can no longer take for granted. With assessment of the groundwater plume from the Anaconda Mine CERLCA site creeping north past neighboring irrigation wells and green fields, the Tribe is growing more and more concerned about the quality of the agricultural industry, so important to our way of life.

As highlighted in the Tribe's press release of December 19, 2011, a comprehensive study of the threat to area agriculture created by the Anaconda Mine Site is needed. Previous groundwater monitoring indicates a plume of metals and radionuclides that extends north from the site into a large agricultural area dependent on groundwater for irrigation. A large number of domestic wells in the same area have been found to be unfit and the residents, including the entire Yerington Paiute Reservation, are provided with bottled water for BP. With this effect on domestic wells documented, irrigation wells from the same area and generally same depth would reasonably be expected to suffer some of the same issues. Adding to this, when an irrigation well near the site was used for aquifer testing this fall, the water had to be moved onsite to lined ponds due to water quality issues.

We are familiar with the January 9, 2009 Technical Memorandum (*Onion Sampling, Peri Farm, Yerington, Nevada*, prepared by CH2M Hill) regarding the issue of farm products and the mine. In that report, a total of four onions were analyzed for uranium. Results showed relatively low levels although a wide range of uranium concentrations was consistently detected. The onions had already been packaged for processing and/or distribution in fields near the site prior to sampling. Contrary to the report title, the onions may or may not have been from an area near the mine or even irrigated with groundwater due to use of Walker River water by the farm in question and their use of other properties extending beyond Mason Valley.

On December 21, 2011, Jerelean Johnson, the EPA Region IX Superfund Project Manager gave notice to the local press that "Crops grown and livestock raised in the Yerington Area should be considered safe for consumption" apparently based on the analysis of those 4 onions in 2009. As I am sure you can recognize, with multiple heavy metals and radionuclides known to have been released from the Anaconda mine and now found in area groundwater, this statement may exceed the intent and scope of that small study.

In addition, EPA statements to the press are contrary to planning. An important agricultural irrigation feature for the valley, the Wabuska Drain, is an Operable Unit (OU7) for the Anaconda Mine Site. Statements by the EPA contrary to planned activities and previous studies for such an important topic has created yet another public relations hurdle for Mason Valley that must be addressed with both urgency and certainty.

In addition to monitoring agricultural products, the Tribe is very interested in the irrigation records, soils analysis, groundwater modeling and irrigation water monitoring that will be part of a complete study of the effect of the Anaconda Mine CERCLA site on area agriculture.

The Tribe looks forward to assisting EPA in developing this important study which can also be a strong start for data collection supporting the RI/FS for OU7. If you have any questions or need to schedule meetings or conference calls, please feel free to contact the office of the Deborah Dunn, at 775.463.3301 x234.

Sincerely,
YERINGTON PAIUTE TRIBE



Linda L. Howard
Tribal Chairman

cc: YPT Environmental Director
Tom Olsen, BLM
Jim Najima, NDEP
Margaret Pauly, YCAG
John Krause, BIA
Jim Sanford, MVEC
WRPT Environmental Director
Kerensa King, USFW
Taurus Massey, Singatse Peak Services