

# Atlantic Richfield Company

**Jack Oman**  
Project Manager

4 Centerpointe Drive  
LaPalma, CA. 90623-1066  
(714) 228-6774 office  
(714) 670-5195 fax  
jack.oman@bp.com

December 23, 2009

Ms. Nadia Hollan Burke  
Remedial Project Manager  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

**Subject: Baseline Human Health Risk Assessment Work Plan for the Inhalation Pathway (Revision 3), Yerington Mine Site, Lyon County, Nevada: Administrative Order for Remedial Investigation and Feasibility Study, EPA Docket No. 9-2007-0005**

Dear Ms. Hollan Burke:

Atlantic Richfield Company (ARC) has prepared the attached Baseline Human Health Risk Assessment Work Plan for the Inhalation Pathway (HHRA Work Plan - Revision 3) dated December 23, 2009, which has been revised based on: 1) recent correspondence between ARC and the U. S. Environmental Protection Agency Region 9 (EPA); and 2) comments received from EPA and the Yerington Paiute Tribe (YPT) dated February 27 and April 5, 2009, respectively. ARC's most recent set of responses (dated June 18, 2009) to EPA and YPT comments are provided as Appendix A of the revised HHRA Work Plan. Subsequent verbal and email agreements between ARC and EPA (not included in Appendix A) include the calculation of residential risk only for inhalation exposure at the Site boundary, which excludes off-Site dispersion modeling and the off-Site deposition of dust.

The revised HHRA Work Plan has also incorporated the following changes, per EPA request:

- The phrase "under current conditions" was added to the first sentence in Section 1.0
- The word "outdoor" was inserted before "air" in the third sentence of the first paragraph in Section 4.2.3 and the next sentence that formerly read "In accordance with risk guidance from the Department of Energy (DOE, 2001), residents are assumed to spend 12 hours a day inside the residence and 12 hours a day outside and the concentration of dust in the indoor air is assumed to be 40 percent of the concentration of dust in the outdoor air." has been deleted.
- The last sentence in Section 4.3.1 that formerly read "For these chemicals, ARC will request that EPA provide a toxicity factor in accordance with EPA guidance (EPA 2009a)." has been replaced with a sentence that reads: "For these chemicals, the oral toxicity factor will be used as a surrogate for inhalation toxicity (route-to-route extrapolation)."

A BP affiliated company



Ms. Nadia Hollan Burke  
EPA Region 9  
December 23, 2009  
Page 2

The revised HHRA Work Plan has been uploaded to the following web site:

<https://partners.ttemi.com/sites/epanevada/default.aspx>;

and is located in the file path listed below:

[Document Library, Anaconda Copper Mine, Yerington, Nevada](#) > [Public Documents](#) > [Current Documents](#) > **Sitewide \HHRA Work Plan Dec 2009**

The copied recipients below will receive hard or electronic copies of the revised HHRA Work Plan. In addition, ARC has provided the text of the revised HHRA Work Plan as a Word file in 'track changes mode' on the attached disc (submitted only to you). ARC anticipates that the draft Baseline Human Health Risk Assessment Work Plan for the Inhalation Pathway Report can be submitted to EPA twelve (12) weeks after receipt of final approval from EPA.

Please contact me at (714) 228-6774 or via e-mail at [jack.oman@bp.com](mailto:jack.oman@bp.com) if you have any questions regarding the attached HHRA Work Plan – Revision 3 dated December 23, 2009.

Sincerely,



Jack Oman  
Project Manager

cc: Dave Seter (EPA)  
Sophia Serda (EPA)  
Carl Brickner (EPA)  
Tom Olsen (BLM)  
Paul Meyer (BLM)  
Sonce DeVries (USFWS)  
Ken Greene (CH2M Hill)  
Victor Early (TetraTech)  
Dan Newell (City of Yerington)  
Chairman Emm (YPT)  
Justin Whitesides (YPT)  
Chairman Reymus (Walker River Paiute Tribe)  
Raymond Montoya (Walker River Paiute Tribe)  
Roxanne Ellingson (Walker River Paiute Tribe)  
Peggy Pauley, YCAG  
Lyon County Library System  
James Lucari (BP)  
Matt Arno (Foxfire Scientific)  
Rich Curley (Curley & Associates LLC)  
Dietrich McGinnis (McGinnis & Associates)  
John Krause (BIA)  
Linda Henry (Brown and Caldwell)  
Chuck Zimmerman (Brown and Caldwell)