Atlantic Richfield Company

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January 30, 2009

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

Subject: **Response to EPA Comments dated January 5, 2009 on the Conceptual Site Model (Revision 2) dated August 29, 2008, and Submittal of the updated Conceptual Site Model (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:

Please find attached Atlantic Richfield Company's (ARC's) responses to comments transmitted by the U.S. Environmental Protection Agency – Region 9 (EPA) to ARC on January 5, 2009 for the Conceptual Site Model (CSM; Revision 2) for the Yerington Mine Site dated August 29, 2008. Also attached is the updated CSM (Revision 3). The CSM is required under the Administrative Order for Remedial Investigation and Feasibility Study for the Anaconda/Yerington Mine Site, Yerington, Lyon County, Nevada EPA Docket No. 9-2007-0005, dated January 12, 2007. ARC's responses to the numbered EPA comments are presented in italicized font following each comment.

Please contact me at 661-287-3855 if you have any questions regarding the attached responses to EPA comments or the attached CSM (Revision 3) dated January 30, 2009.

Sincerely,

Roy I. Thun
Environmental Business Manager

cc: Dave Seter (EPA)
Sophia Serda (EPA)
Carl Brickner (EPA)
Tom Olsen (BLM)
Paul Meyer (BLM)
Joe Sawyer (NDEP)
Damian K. Higgins (USFWS)
Sonce DeVries (USFWS)
David Towell (CH2M Hill)
Victor Early (TetraTech)
Dan Newell (City of Yerington)
Vince Conway (YPT)
Justin Whitesides (YPT)
Roxanne Ellingson (Walker River Paiute Tribe)
Lyon County Library System
James Lucari (BP)
Jim Chatham (BP)
John Batchelder (BP)
Terry Walden (BP)
Rosalind Schoof (Integral Consulting)
Les Williams (Integral Consulting)
Matt Arno (Foxfire Scientific)
Rock Vitale (ESI)
Rich Curley (Curley & Associates LLC)
Dietrich McGinnis (McGinnis & Associates)
John Krause (BIA)
Linda Henry (Brown and Caldwell)
Chuck Zimmerman (Brown and Caldwell)

The following responses to comments have been prepared by the Atlantic Richfield Company (ARC) to comments received by the U.S. Environmental Protection Agency - Region 9 (EPA) on the Conceptual Site Model (CSM; Revision 2) for the Yerington Mine Site (Site). It is ARC's understanding that: 1) EPA's review focused only on the portions of the CSM that were revised in response to EPA's June 2, 2008 comments on the CSM; and 2) selected comments provided by the Yerington Paiute Tribe (YPT) dated October 14, 2008 have been included in EPA's comments. ARC responses (in italicized font) are provided beneath each numbered EPA comment, and refer to the updated CSM (Revision 3) dated January 30, 2009 as the 'attached revised CSM'.

Comments on ARC's August 29, 2008 Revised CSM

1. Pages 3-8, Climate and Air Quality section. EPA is in the process of reviewing ARC's *Air Quality Monitoring Program Data Summary Report*, dated May 29, 2008, portions of which have been inserted into the CSM. EPA has significant comments on some of the Data Summary Report text and conclusions. Revised text will need to be incorporated into the CSM before it can be finalized.

***ARC Response**: The CSM text has been updated to reflect changes to the Air Quality Monitoring Data Summary Report that were requested by EPA in a comment letter dated January 5, 2009.*

2. Page 4, 1st bullet. A citation should be provided for the statement regarding wind speed requirements for particulate emission.

***ARC Response**: A citation for EPA 1995 has been added to the text and the list of references of the attached revised CSM.*

3. Page 17, timeline. The latter stages of the timeline should be expanded to summarize the NDEP and EPA removal actions that impact site conditions.

***ARC Response**: The timeline has been updated in the attached revised CSM to summarize NDEP and EPA removal actions since 2000 that (may) have impacted site conditions.*

4. Page 62, 2nd paragraph. The last sentence states "Therefore, an on-site residential scenario is not included in this CSM." As stated previously, EPA does not concur that the on-site residential scenario should be eliminated. This pathway needs to be included to demonstrate that it has been evaluated. Replace the last sentence with the following: "Therefore, an on-site residential scenario is included in this CSM as low probability and potentially incomplete." This scenario should be added to Figures 3-1 and 3-2 with notations indicating that it is low probability and potentially incomplete.

***ARC Response**: ARC has modified the attached revised CSM to address this comment, and the on-Site residential scenario has also been added to Figures 3-1 and 3-2 with notations indicating that it is low probability and potentially incomplete. A column for a potential 'On-Site' resident has been added to Figure 3-1 with the designation for "Exposure route considered low probability and potentially incomplete". The 'Off-Site' designation has been removed from the term 'Resident' on Figure 3-2. A box showing exposure pathways for On-Site resident has been added to Figure 3-2 and a footnote has been added indicating that "Exposure pathways for onsite residents are considered low probability and potentially incomplete." Section 3.4 (pages 68 and 69) of the attached revised CSM now includes the following two paragraphs (located at the beginning and end of the section, respectively):*

3.4 Resident

Potential exposure routes for off- and on-Site residents are considered in this section of the CSM. Off-Site residents also include those individuals who practice tribal lifeways, which are discussed in Section 3.5. An on-Site residential exposure scenario is included in this CSM as a low probability occurrence and partially incomplete because of existing land ownership (half the Site is owned by BLM), current Lyon County land use planning and, more importantly, the likelihood that future mining and ore-reprocessing activities will occur at the Site.

<u>On-Site Resident</u>

The probability that the Site would be used for residences in the future is very low and the exposure pathways are considered potentially incomplete. However, in theory, a hypothetical future resident could be exposed to mine-related chemical via air, soil, tailings materials, sediment, surface water and biota through ingestion, inhalation, dermal contact and external radiation as noted in Figures 3-1 and 3-2.

5. Page 69, bullet lists. Other minor exposure pathways that should be discussed include ingestion of potentially-impacted wild game and the potential exposure to surface soil associated with local commercial crops.

***ARC Response**: Ingestion of potentially-impacted wild game and the potential exposure to surface soil associated with local commercial crops have been added to the last bullet in the first set of bullets on Page 71 of the attached revised CSM.*

6. Page 70, Sec. 3.5, 2nd paragraph. The text focuses only on exposure through the irrigation water/groundwater route. However, incidental ingestion, dermal contact and external radiation exposure to potentially-impacted soil that may be present on native plants and wild game should also be considered.

***ARC Response**: Incidental ingestion, dermal contact and external radiation exposure to potentially impacted soil that may be present on native plants and wild game was added to this section of the attached revised CSM.*

7. Figures 3-1 and 3-2. These two figures should be revised in accordance with the comments 3 through 5.

***ARC Response:** Comment 3 required additions to the text, which have been included in the attached revised CSM, including those described in ARC's response to Comment 4 (above). Changes were made to Figures 3-1 as follows: 1) the words "and contact with associated soil" were added to footnote "h"; 2) the designation for dermal contact, ingestion and external radiation exposure for off-Site traditional tribal lifeways was changed from a dash (incomplete pathway) to an open circle (potentially complete but minor pathway) for subsurface soil; and 3) "contact with associated surface soil" was added to appropriate pathways on Figure 3-2 designated with an asterisk.*

8. Page 73, 2nd paragraph, 2nd sentence. A citation should be provided supporting the statement that volatilization to outdoor air is not relevant to ecological receptors.

***ARC Response:** The referenced paragraph has been deleted from the introduction to Section 4.0 of the attached revised CSM. Discussion of the relative importance of the inhalation route of exposure and how it might be handled for specific operable units (OUs) is provided in Section 4.2 (Page 74), which includes the following text: "Inhalation is a potentially complete pathway for terrestrial invertebrates by passive exchange of air, and for vertebrates by breathing in airborne particulates or volatilized chemicals. Because volatile chemicals are not expected to be present in surface soils, inhalation of vapors in outdoor air is not considered to be a complete pathway. Inhalation is generally considered to be a relatively minor pathway for exposure relative to direct ingestion of chemicals of concern by wildlife. For example, EPA (2005) did not use inhalation of soil particles in deriving the national ecological soil-screening levels ("SSLs") because exposure is accounted for by the soil-ingestion route. One exception to the statement that inhalation is generally considered a minor pathway is the potential inhalation of particulates and volatile chemicals by burrowing animals in subsurface soils (Figure 4-1)."*

9. Appendix E. The updated EPA RSLs (dated September 12, 2008) should be included in the appendix.

***ARC Response:** RSL tables in Appendix E of the attached revised CSM have been updated to represent the September 12, 2008 values.*

10. Page 77, last sentence (continues to Page 78). Provide additional explanation for the conclusion that radiation exposure (internal and external) is a minor contributor to a receptors overall radiation dose.

ARC Response: *Text has been added to Page 77 of the attached revised CSM to explain that preliminary data for Ra-226 and -228 emissions at the Site are well below U.S. Department of Energy ("DOE") screening levels that are protective of internal and external radiation in wildlife. For the purposes of the attached revised CSM, wildlife exposure to internal and external radiation is assumed to be potentially complete, but insignificant or minor. This assumption will be re-evaluated based on site-specific comparisons of radiochemical activities to DOE Soil Level Values (SLVs) in the SLERA for each OU.*

11. Page 79, 2nd paragraph. It is not uncommon for annuals and even some perennials in that ecosystem to rely for "flashy" surface water occurrences to support their growth. At the Anaconda Mine Site, this surface water flows may contained elevated dissolved contaminants. How will this be accounted for?

ARC Response: *The following text has been added as a footnote to Section 4.3 of the attached revised CSM (Page 79): "To the extent that 'flashy water' associated with precipitation transports suspended soil particles or dissolved contaminants, exposure of plants to these contaminants would be mediated by root uptake from the soil matrix and, therefore, is accounted for in the soil exposure pathway."*

12. Page 81, 2nd bullet. Resting periods comprise a considerable part of the total day for these animals. The scientific justification for calling this pathway insignificant is not clear. Either revise this conclusion or provide additional text to support the stated presumption.

ARC Response: *The references to resting periods have been removed from the text in the attached revised CSM (the previous version of the CSM [Revision 2] contained such references in three locations [bullets on Pages 81 and 82]).*

13. Appendix D. This appendix represents a significant improvement in the discussion of Tribal Lifeways compared to prior versions of the CSM. However, the Yerington Paiute Tribe (YPT) still has some specific comments on Appendix D that ARC needs to incorporate into the revised CSM. Please refer to the Appendix D comments in the YPT's October 14, 2008 comment letter addressed to Nadia Hollan Burke/EPA.

ARC Response: *Appendix D has been revised to include information from the reference requested in the YPT comments "Wovoka and the Ghost Dance" by Michael Hittman. ARC also obtained permission from the Special Collections section of the University of Nevada in Reno to include ten of Margaret Wheat's photographs depicting various Tribe lifeways that are discussed in Appendix D.*

EPA Comments on the Response to Comments Letter included with ARC's August 29, 2008 Revised CSM

1. Response to Comment 28, Page 18 of RTC letter. Although the response to comments (RTC) letter states that ephemeral ponded surface water pathway has been added to the CSM, it does not appear that it has been added to Figure 4-1.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. Footnote 'm' has been added, which states: "Surface water includes both perennial and ephemeral occurrences. Ephemeral ponded waters will be evaluated, as appropriate, for specific OUs."*

2. Response to Comment 29, Page 18 of RTC letter. Internal exposure to radiochemicals has been added to the text, but no change was made to Figure 4-1.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. The exposure route is now listed as "Radiation Exposure[l]." Footnote 'l' has been added, which states: "Total radiation exposure (internal and external)."*

3. Response to Comment 36g, Page 23 of RTC letter. Figure 4-1 does not appear to have been corrected as gopher inhalation is shown to complete, but insignificant.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment to indicate that the gopher inhalation pathway includes soil particles as well as vapors. The two boxes that read "Vapors in indoor air/burrows" have been revised to read "Indoor air and burrows". The text has been modified to state "Inhalation is a potentially complete pathway for terrestrial invertebrates by passive exchange of air, and for vertebrates by breathing in airborne particulates or volatilized chemicals. Because volatile chemicals are not expected to be present in surface soils, inhalation of vapors in outdoor air is not a complete pathway. Inhalation is generally considered a relatively minor pathway for exposure relative to direct ingestion by wildlife of chemicals of concern. For example, EPA (2005) did not use inhalation of soil particles in deriving the national ecological soil-screening levels ("SSLs") because exposure is accounted for by the soil-ingestion route. One exception to the statement that inhalation is generally considered a minor pathway is the potential inhalation of particulates and volatile chemicals in the confined spaces occupied by burrowing animals in subsurface soils (Figure 4-1)."*

4. Response to Comment 36h, Page 23 of RTC letter. We were unable to find specific discussion in the CSM of potential inhalation of solid material containing alpha radiation contamination.

ARC Response: *Inhalation of airborne particulates with radiation contamination as a source of exposure is included in Figure 4-1 of the attached revised CSM. The radiation exposure route captures both external radiation, and internal radiation (including alpha emitters) via ingestion and inhalation, as discussed in Section 4.2 (Page 77): "Internal radiation exposure (dose) may occur as a result of an intake of radiochemicals by any of the inhalation, dermal contact/uptake, direct ingestion, and trophic transfer pathways discussed above."*

5. Response to Comment 36q, Page 18 of RTC letter. It is not clear how the 1st statement in the response (*'This response falls under the overarching EPA Specific Comment 36 on page 20'*) relates to answering the comment. Regardless, we concur that evaluation of reptiles and amphibians in terrestrial habitats is problematic due to limited availability of suitable toxicity data and the poorly developed exposure estimation methods. However, significant data are available for the evaluation of effects on various amphibian life stages in aquatic habitats. In addition methods exist to evaluate sediment toxicity to amphibians (new ASTM standard: E2591-07). These could be applied in subsequent tiers if risks are identified. Although amphibian data are included in the AWQCs, AWQCs are not specific for amphibians. Amphibian-specific toxicity data should be used to provide an explicit evaluation of risks to amphibians.

Note that this does not require any change to the CSM. As noted in the RTC letter, these issues can be resolved as part of future ecological risk assessment activities.

ARC Response: *Comment noted and ARC agrees that these issues can be resolved as part of future ecological risk assessment activities.*

6. Response to Additional Comment 3, Page 29 of RTC letter. Biota has been added as an exposure medium in the text, but Figure 4-1 has not been modified.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. The addition of biota is addressed in Footnote f for the trophic transfer pathway, which refers to exposure by the consumption of lower trophic level species that are exposed to the exposure medium.*

7. Response to Additional Comment 8, Page 29/30 of RTC letter. Neither the text (page 75, last paragraph, line 2) nor Figure 4-1 have been changed.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. The column heading for invertebrates now lists "Terrestrial Invertebrates" as a sub-heading. Footnote 'e' in Figure 4-1, and the text, has also been changed from 'infaunal invertebrates' to 'invertebrates that burrow'.*

8. Response to Additional Comment 11, Page 30 of RTC letter. Only a portion of the stated response was incorporated into the CSM. The phrase "might result in significant exposure" was not added to the text.

ARC Response: *The phrase has been added to the text (Page 77, and modified as: "represent a primary route of exposure" to be consistent with ARC's response to EPA Comment 28 (below).*

9. Response to Additional Comment 12, Page 30 of RTC letter. The paragraph referenced in the original comment has not been modified. Suggest deleting the paragraph from the CSM (2nd paragraph on Page 77).

ARC Response: *This paragraph has been deleted from the attached revised CSM.*

10. Response to Additional Comment 14, Page 30 of RTC letter. The text has been revised, but Figure 4-1 was not changed.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. Footnote 'l' was added, which states "Total radiation exposure (internal and external).*

11. Response to Additional Comment 16, Page 31 of RTC letter. Text changes have been made, but reference to epifauna and infauna soil invertebrates remains in Figure 4-1.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. The reference to epifauna and infauna soil invertebrates has been removed from Figure 4-1.*

12. Response to Additional Comment 18, Page 31 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *As requested by EPA in Comment 34 (p. 33 of the August 28, 2008 comments), the exposure pathway for trophic transfer of airborne particulates has been changed to incomplete for all receptors and, therefore, has been deleted from the text and Figure 4-1 of the attached revised CSM. The following sentence has been added to Footnote 'f' on Figure 4-1: "Trophic transfer is not shown for airborne particulates because this pathway is captured by the surface soil pathway." See related ARC responses to comments 13 and 22 (below).*

13. Response to Additional Comment 20, Page 31 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *As requested by EPA in Comment 34 (p. 33 of the August 28, 2008 comments), the exposure pathway for trophic transfer of airborne particulates has been changed to incomplete for all receptors and, therefore, has been deleted from the text and Figure 4-1. The following sentence has been added to Footnote 'f' on Figure 4-1: "Trophic transfer is not shown for airborne particulates because this pathway is captured by the surface soil pathway." See related ARC responses to comments 12(above) and 22(below).*

14. Response to Additional Comment 22, Page 32 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. Open circles for potentially complete, minor pathways have been added to Figure 4-1 for ingestion and radiation exposure from surface water for the pocket gopher.*

15. Response to Additional Comment 23, Page 32 of RTC letter. Text changes have not been made.

ARC Response: *The CSM text has been modified to indicate one mammal under Invertivores.*

16. Response to Additional Comment 28, Page 32 of RTC letter. The text has been revised, but Figure 4-1 was not changed.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. Open circles for potentially complete, minor pathways have been added for ingestion and radiation exposure from surface water for the shrew.*

17. Response to Additional Comment 29, Page 32 of RTC letter. Neither the text nor Figure 4-1 was revised.

ARC Response: *ARC did not add an exposure pathway for the kestrel drinking surface water in the August 29, 2008 CSM (Revision 2) and has not included this exposure pathway in the attached revised CSM (text and Figure 4-1), based on the following evidence that kestrels do not ingest surface water. The Birds of North America website includes the following information from Smallwood and Bird 2002: "Little information on drinking for wild birds. Captive kestrels maintained for years on a diet of day-old cockerels and no water bred normally and showed no apparent side effects. [A kestrel] Not only derives water from food content and metabolic sources…, but also produces very concentrated urine in kidneys considered heavy relative to body mass in comparison to other raptor species". This information indicates no support for the concept that kestrels regularly or occasionally drink free-standing surface water and the resulting pathway for ingestion in the CSM.*

Although there is a water ingestion rate provided in the Wildlife Exposure Factors Handbook (EPA 1993), this value is estimated from allometric equations and not based on actual surface water ingestion rates. As an allometric equation it simply estimates rates of water intake which are not specific to the pathway of intake (e.g., an estimate of intake via water content in food). ARC has not been successful in identifying any evidence that kestrels drink water, and is willing to consider any evidence to the contrary that EPA can provide.

References:

EPA, 1993, Wildlife exposure factors handbook. EPA/600/R-93/187. U.S. Environmental Protection Agency, Office of Research and Development, Washington, DC.

Smallwood, John A. and David M. Bird. 2002. American Kestrel (Falco sparverius), The Birds of North America Online (A. Poole, Ed.). Ithaca: Cornell Lab of Ornithology. http://bna.birds.cornell.edu/bna/species/602. Accessed August 4, 2008.

18. Response to Additional Comment 30, Page 33 of RTC letter. Text changes have not been made.

ARC Response: *As discussed in detail in the response to Comment 17 (above), ARC has not found evidence to support the identification of a complete exposure pathway for kestrels from the ingestion of any type of surface water.*

19. Response to Additional Comment 31, Page 33 of RTC letter. The comment has been partially addressed as the kit fox has been dropped from the text, but it remains in Figure 4-1.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. Kit fox has been removed from Figure 4-1.*

20. Response to Additional Comment 32, Page 33 of RTC letter. The comment has been partially addressed as the kit fox has been dropped from the text, but it remains in Figure 4-1.

ARC Response: *Figure 4-1 in the attached revised CSM reflects this comment. Kit fox has been removed from Figure 4-1.*

21. Response to Additional Comment 34a, Page 33 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. Open circles (complete but minor exposure pathway) have been added for dermal contact with airborne particles for all receptors except aquatic invertebrates.*

22. Response to Additional Comment 34b, Page 33 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *As requested by EPA in Comment 34 (p. 33 of the August 28, 2008 comments), the exposure pathway for trophic transfer of airborne particulates has been changed to incomplete for all receptors and therefore has been deleted from the text and Figure 4-1. The following sentence has been added to Footnote 'f' on Figure 4-1: "Trophic transfer is not shown for airborne particulates because this pathway is captured by the surface soil pathway."*

23. Response to Additional Comment 34e, Page 34 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. An open circle (complete but minor exposure pathway) has been added to Figure 4-1 for radiation exposure to woody plants from groundwater.*

24. Response to Additional Comment 34g, Page 34 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *The changes requested for the coyote have been included in Figure 4-1 of the attached revised CSM. Ingestion of subsurface soil by the coyote has been changed from a dash (incomplete pathway) to an open circle (potentially complete but minor pathway). Upon further consideration, however, ARC does not agree that there is sufficient evidence to support ingestion of subsurface soil by the jackrabbit. The CSM text (Page 81) explains that the jackrabbit forages as a browser and contacts only the first few inches of soil. Therefore, the ecology of jackrabbits does not indicate a complete exposure pathway via ingestion of subsurface soil.*

25. Response to Additional Comment 34h, Page 34 of RTC letter. External radiation exposure from subsurface soil to shrew, gopher, plants, and soil invertebrates should be shown as 'potentially significant' in Figure 4-1.

ARC Response: *The open circles indicating minor pathways in Figure 4-1 have not been changed to closed circles in Figure 4-1, indicating primary pathways, because ARC has presented additional evidence in the attached revised CSM that exposure to external radiation is expected to be a minor pathway. Specifically, text has been added to Page 77 of the revised CSM to explain that preliminary data for Ra 226 and Ra 228 emissions at the Site are well below DOE screening levels that are protective of internal and external radiation in wildlife. Consequently, wildlife exposure to internal and external radiation is assumed to be potentially complete, but minor for all receptors. ARC will evaluate this issue based on Site-specific comparisons of radiochemical activities to DOE SLVs in the SLERA for each OU.*

26. Response to Additional Comment 34i, Page 34 of RTC letter. If internal exposure is to be assumed to be addressed by all of the pathways listed in the response, a footnote should be included in Figure 4-1 to make this explicit. As currently presented, internal radiation exposure is not addressed in the figure.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. Footnote 'l' has been added, which states: "Total radiation exposure (internal and external)".*

27. Response to Additional Comment 34k, Page 34 of RTC letter. Revisions to Figure 4-1 have not been made.

ARC Response: *Figure 4-1 in the attached revised CSM has been modified per this comment. An open circle (complete but minor exposure pathway) has been added for radiation exposure to woody plants from groundwater.*

28. Response to Additional Comment 41, Page 36 of RTC letter. The requested change has not been made.

ARC Response: *The word 'insignificant' has been changed to 'minor' in the text and tables for the human health and ecological sections of the attached revised CSM. Also, the term 'potentially significant' has been changed to 'primary' to minimize any implication that the pathway represents a concern prior to completion of the risk assessments.*