March 6, 2014

Ms. Barbara Nielson

Manager, Remediation Division

Freeport-McMoRan Copper & Gold, Inc.

On Behalf of Cyprus Amax Minerals Company

333 N. Central Avenue

Phoenix, AZ 85004

RE: Amendment No. 2 to the Interim Action Workplan for the Former Satralloy Site.

Ms. Nielson,

I received Amendment No. 2 to the Interim Action Workplan for the former Satralloy Site (Site) on March 4, 2014. This Amendment requested approval for removal and deposition of saturated dust found on the North Mill Building, the South Mill Building, and the Waste Water and Cooling Pumphouse buildings. The request included information on the mode of dust collection, transport and details on the preparation of depositional area. The dust will be deposited in a natural depression which will be further bermed to prevent migration of any materials within the area. The design is to let the saturated dust dewater naturally and then include this area in the final facility’s corrective action investigations.

In keeping with the rationale for analyzing and containing other dust material that will be removed from the buildings during demolition, the saturated dust will need to be initially characterized to determine whether it could display the characteristic of toxicity. If it is determined that a waste characteristic can be applied to this material, the Ohio EPA would expect that the material in the bermed area would be treated in a similar manner as other process waste collected from the buildings. The plan should include a provision for covering the dust using available materials found within the confines of the site. In addition, maintenance of the bermed depositional area should be contemplated in the plan so that any breaches or overflows of the bermed area are fixed in an expeditious manner. If the saturated dust material is determined not to bear the characteristic of toxicity, then covering would not be necessary, but maintenance review would need to be considered.

Please incorporate these changes into a revised amendment for my approval. I’m available at your convenience to discuss these comments.

Sincerely

Erik Hagen, Ph.D.

Site Coordinator

Ohio EPA, Division of Environmental Response and Revitalization