

Cyprus Amax Minerals Company
333 North Central Avenue
Phoenix, AZ 85004

November 12, 2015

Maria Galanti
Site Coordinator
Division of Environmental Response and Revitalization
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138

**RE: Amendment No. 4 to the Interim Action Workplan
Former Satralloy Site**

Dear Ms. Galanti:

Cyprus Amax Minerals Company (Cyprus) would like to amend the Interim Action Workplan in accordance with the Consent Order for Preliminary Injunction (COPI) Section VI (Interim Action) 13(d) and Section XII (Review of Submittals): "All work plans, reports, or other items required to be submitted to Ohio EPA under this COPI, including any approved additional Work, shall, upon approval by Ohio EPA, be deemed to be incorporated in the made an enforceable part of this COPI."

SCHEDULE

Cyprus and Golder Associates are currently negotiating the contract that we will use to complete Interim Action work. We expect to be able to begin the portion of the interim action work that Cyprus previously planned for 2015 in spring 2016 and complete the work in 2016.

ADDITIONAL WORK

Cyprus proposes the following additional work under this Amendment:

- **PCB soil and concrete removal** – Soils and concrete impacted by polychlorinated biphenyls (PCBs) have been found near the Electrical Building at the site. The PCB concrete and PCB soil with PCBs detected at greater than or equal to 2 mg/kg will be removed for off-site disposal in accordance with applicable regulations.

- **Filling of Waterbodies in the Lowlands** – Three waterbodies identified as federally jurisdictional by the U.S. Army Corps of Engineers (Corps), consisting of one wetland and two manmade ditches in the plant area of the site, will be filled so they will not interfere with future remedial action as shown on the attached drawing. Because the area to be filled is less than 0.1 acre per waterbody, mitigation will not be required. A Preconstruction Notification has been submitted to the Corps for coverage of this work under Clean Water Act Section 404 Nationwide Permit No. 38, Cleanup of Hazardous Waste. Work will not commence until the work coverage is authorized by the Corps.

Cyprus respectfully requests approval of the additional Work described above. Please call me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara K. Nielsen".

Barbara K. Nielsen
Manager, Remediation Projects

cc: Sabrina Mizrachi, Cyprus-Amax Minerals Company
Lee Holder, Golder
J. Stanton Curry, G&K
Shane Farolino, R&A
Chris Rife, Westland Resources