



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

November 30, 2015

**RE: Satra Concentrate Steubenville
Investigation Report
Remedial Response
Jefferson County
441001068009**

Barbara Nielsen, Project Manager
Cyprus Amax Minerals Company
333 N. Central Avenue
Phoenix, AZ 85004

Lee Holder, Project Manager
Golder Associates Inc.
18300 NE Union Hill Road
Redmond, Washington 98052

Subject: Addendum No. 4 to the former Satralloy Site; Interim Action Schedule

Dear Ms. Nielsen and Mr. Holder,

Ohio EPA has completed the review of the November 12, 2015 submittal titled Addendum No. 4 to the Interim Action Work Plan. Addendum No. 4 describes additional work pursuant to the requirements of 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 enforceable part of the COPI." As noted in the November 12 correspondence, the additional work consists of:

- PCB soil and concrete removal – Recent data indicate the polychlorinated biphenyls (PCBs) have been found near the electrical building at the site. Concrete and soil with PCB concentrations exceeding or equal 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 as not to interfere with future remedial action. Because the area 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

Satra Concentrate Steubenville

November 30, 2015

Page 2

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.

Ohio EPA approves of the additional work for PCB removal in soils and on the concrete pad as noted in bullet one in accordance with Section XII, Review of Submittals, of the November 2010 COPI. Please provide a schedule for PCB removal in soils and the concrete pad once it has been finalized for Ohio EPA to incorporate into the appropriate work plan and the COPI.

Regarding the work that is described in bullet two, filling in of waterbodies in the Lowlands, Ohio EPA understands that the work has yet to be authorized by the Corps. While Ohio EPA acknowledges the need to complete the work as described above, to prevent interference with future remediation, approval or authorization is completed by the Corps not Ohio EPA. Thus, once the Corps authorizes the work of filling in of waterbodies pursuant to the Clean Water Act Section 404, Nation Wide Permit No.38, please submit a schedule to Ohio EPA for completion of the work.

If you have any questions regarding this correspondence, please do not hesitate to contact me at 740-380-5289 or maria.galanti@epa.ohio.gov.

Sincerely,



Maria Galanti

Site Coordinator

Division of Environmental Response and Revitalization

MG/cb

cc: John Rochotte, Supervisor, DERR-SEDO
Lisa Shook, DERR-CO
Brian Tucker, DERR-CO
Rachel Taulbee, DSW-SEDO