



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

Barbara K. Nielsen
Manager, Remediation Projects
Telephone: (602) 366-8270
Fax : 602-366-7307
E-mail: bnielsen@fmi.com

March 2, 2020

VIA EMAIL AND U.S. MAIL

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

**RE: Amendment No. 7 to the Interim Action Workplan
Former Satralloy Site**

Dear Mr. Cook:

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

BACKGROUND

After consultation with Ohio EPA, it was determined that it would be beneficial to conduct a Focused Feasibility Study (FFS) in order to evaluate the alternatives for addressing the Site slag with the relatively highest potential risks (the lowland slag) as an interim action (IA). The FFS will identify a preferred alternative for negotiation with Ohio EPA.

PURPOSE

This document describes how a FFS will be performed to determine the appropriate IA(s) to address the Site slag containing the relatively highest potential risks (i.e., the lowland slag).

SCOPE OF WORK

As indicated above, the slag with the relatively highest potential risks to human health and the environment is located in the lowlands of the Site (Figure 1). As documented in the draft Human Health Risk Assessment (HHRA), the south lowland slag has the relatively highest potential human health risk of the Site slag. The north lowland slag has the most potential to contribute to discharges of chromium to Cross Creek.

The FFS will be performed in the following steps:

- Identification of Remedial Action Objectives (RAOs)
- Identification of Applicable or Relevant and Appropriate Requirements (ARARs)
- Identification and screening of remediation technologies
- Assembly of remediation technologies into remediation alternatives, and screening of these alternatives
- Development of alternatives retained after screening
- Evaluation of alternatives

The alternatives will be evaluated using the standard FS criteria (40 CFR 300.430(e)(9)):

- Overall protection of human health and the environment
- Compliance with ARARs
- Long-term effectiveness and permanence
- Reduction in toxicity, mobility and volume through treatment
- Short-term effectiveness
- Implementability
- Cost

The first two criteria are termed "threshold" criteria. These criteria address minimum requirements that must be met for remediation alternatives to be selected. The retained alternatives, with the possible exception of "No Further Action", must meet the requirements of these two criteria.

The next five are the "balancing" criteria, which are the primary criteria upon which the evaluation is based.

Two "modifying" criteria are not evaluated in an FS, because they are based on state and public comments:

- State Acceptance – determined via review and approval of the FFS
- Community Acceptance – determined based on public comments on the FFS

DELIVERABLES

To expedite and complete the FFS, the FFS will be submitted to Ohio EPA and reviewed in the following sections:

- RAOs and ARARs
- Identification and Screening of Technologies
- Assembly and Screening of Alternatives
- Agency Draft FFS, including the Evaluation of Alternatives
- Public Draft FFS, revised to address Ohio EPA comments
- Final FFS, revised to address public comments.

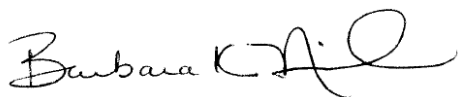
The sections will not be reissued after revisions to address Ohio EPA comments. Rather, the revised sections will be incorporated into each draft FFS.

Shannon Cook
Ohio Environmental Protection Agency
March 2, 2020

CLOSING

Cyprus respectfully requests approval of Amendment No. 7 to the Interim Action Workplan as described above. Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara K. Nielsen". The signature is fluid and cursive, with the first name "Barbara" written in a larger, more prominent script than the last name "Nielsen".

Barbara K. Nielsen
Manager, Remediation Projects

cc: