



July 26, 2019

Mr. Michael Fodse
U.S. ARMY CORPS OF ENGINEERS
1000 Liberty Avenue
Pittsburgh, Pennsylvania 15222-4186

**Re: REVISED PROJECT AREA, PRECONSTRUCTION NOTIFICATION FOR
REMEDIAATION ACTIVITIES AT THE FORMER SATRALLOY SITE, CORPS
FILE NO. 2005-2397
WESTLAND PROJECT NO. 1271.05**

Dear Mr. Fodse:

Per our discussion with you on July 16, 2019, on behalf of Cyprus Amax Minerals Company (Cyprus) WestLand Resources, Inc. (WestLand) is submitting this revision of the project area for the Former Satralloy Site remediation activities Preconstruction Notification (PCN). We originally submitted the PCN to you on March 15, 2019; further design of the project activities in the interim has changed some of the project elements, as described below.

Building Demolition

Fill to Wetland QQ, associated with the building demolition activities, has been removed from the project design described in the PCN. The new project design avoids this wetland.

Surface Water Management

There are no changes to the surface water management activities described in the PCN.

Road Improvements

The road improvements described in the PCN referred to a 15-foot wide alignment. That width represents the travel way rather than the full footprint of the disturbance area. The actual disturbance area will be a maximum of 40 feet wide, which accounts for the road prism and cut-and-fill activities where necessary to traverse steep slopes. Additionally, a few other segments of the existing road will be improved and three small areas will be excavated to provide road base materials (i.e., borrow sources). However, these changes will not affect any potential waters of the U.S.

PCN **Figure 3**, *Impacts to Potential Waters and Wetlands of the U.S.*, has been revised to reflect these changes. The revised version is attached.

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ENGINEERING AND ENVIRONMENTAL CONSULTANTS

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The environmental effects that would result from the revised project are described as follows.

Waters of the U.S.

Wetland QQ will not be filled as part of the revised project; all other impacts to potential waters of the U.S. remain as described in the PCN. **Table 1** provides the acreage of the proposed impacts to potential waters of the U.S.

Table 1. Project Impacts to Potential Waters of the U.S.

Activity (Location)	Potential Waters Impacted	Impacts (acres)
Building Demolition (Plant Area)	Tributary OO	0.0019
	Wetland RR	0.0072
	Subtotal	0.0091
Settling Pond Development (Plant Area)	Tributary LL	0.0059
	Wetland LL	0.0030
	Subtotal	0.0089
Road Improvements (Mine Perimeter Road)	Wetland S3	0.0332
	Wetland S4	0.0118
	Subtotal	0.0450
Total Tributary Impacts		0.0078
Total Wetland Impacts		0.0552
Total Impacts		0.0630

Threatened and Endangered Species

As described in the original PCN, two federally listed bat species have potential to occur at the site. These two species, the Indiana bat and the northern long-eared bat, both summer roost in trees such as are present at the Satralloy site. Cyprus has carefully mapped the proposed road alignment to avoid potentially suitable roosting trees to the extent practical, and plans to remove trees during the winter season (October 1 to March 31) to avoid impacting roosting bats.

Although not quantified in the original PCN, the forested area that would be cleared for the originally proposed road improvements was calculated as 1.7 acres. The revised footprint of the road improvements plus the borrow areas is 7.0 acres. The former Satralloy site encompasses approximately 327 acres, about 2/3 (~220 acres) of which is forested with a mixture of suitable and unsuitable roosting trees. The 7 acres of forest that would be cleared for the revised project represents approximately 3.2 percent of the forested area on the site. Accordingly, the revised project area is still considered to have an insignificant and discountable potential to affect either species.

Historic Properties and Cultural Resources

The revised project would not affect any known cultural resources, identical to the original project.

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If you have any questions or require additional information, please do not hesitate to call.

Respectfully,
WestLand Resources, Inc.

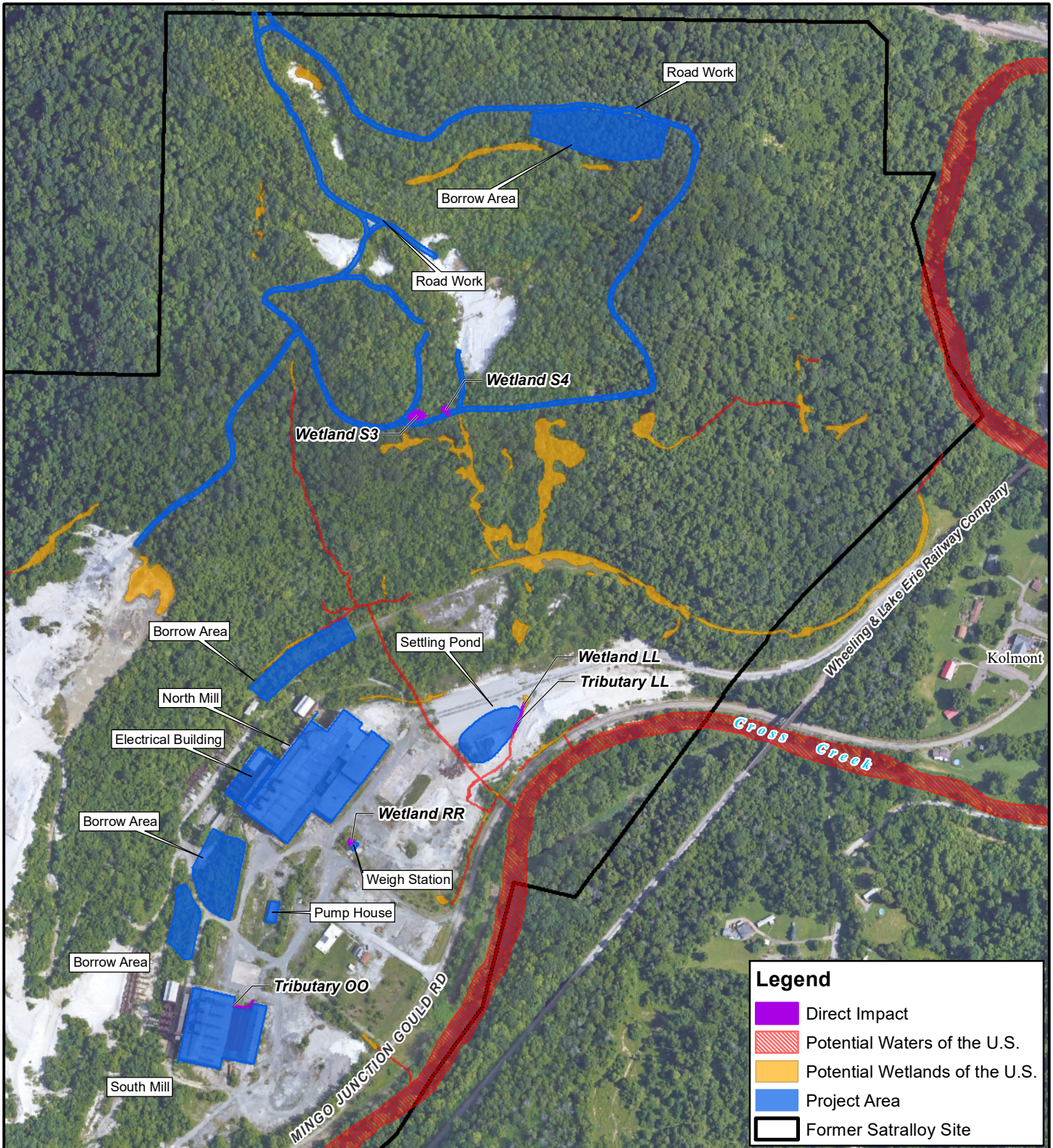
A handwritten signature in black ink, appearing to read "Claire Phillips". The signature is fluid and cursive, with the first name "Claire" and last name "Phillips" clearly distinguishable.

Claire Phillips
Environmental Specialist

CMP:kd

Attachment: PCN Figure 3, Impacts to Potential Waters and Wetlands of the U.S. (Revised)

cc: William E. Cobb, Cyprus Amax Minerals Company
Barbara Nielsen, Freeport-McMoRan Inc.
Chris Rife, WestLand Resources, Inc.



Project Area in:
 T6N, R2W, Portions of Sections 8, and 9,
 Jefferson County, Ohio
 Data Source: Golder
 Image Source: Google Earth 06/08/2016

CYPRUS AMAX MINERALS CORPORATION
 Pre-Construction Notification
 Nationwide Permit 38
 (Cleanup of Hazardous and Toxic Waste)

IMPACTS TO POTENTIAL WATERS AND WETLANDS
 OF THE U.S. (REVISED)

Figure 3

WestLand Resources



0 250 500 Feet
 0 75 150 Meters