

June 26, 2018

Barbara Nielsen, Manager Freeport-McMoRan 333 North Central Avenue Phoenix, AZ 85004 Re: Cyprus Amax Minerals Co. Former Satralloy site Inspection Inspection NPDES Jefferson County 0GC01828*AG 0GR00401*FG

Subject: NPDES Construction and Industrial Storm Water Inspections

Dear Ms. Nielsen:

On May 1, 2018, Ohio EPA conducted construction storm water and industrial storm water inspections at the Cyprus Amax Minerals Company facility, former Satralloy site, at 4243 County Road 74 in Mingo Junction, Ohio. During the inspection Barbra Nielsen represented Freeport-McMoRan, John Wise represented Golder Associates, and I represented the Ohio EPA, Southeast District Office, Division of Surface Water.

The purpose of the inspection was to evaluate your compliance with the terms and conditions of your National Pollutant Discharge Elimination System (NPDES) permits for discharges of storm water associated with construction and industrial activities.

Findings:

- There was visible accumulation of precipitate within the hillside channels that flow to locations SC1 and SC2 located off Sheep Rock Road and discharging to Cross Creek.
- Accumulation of precipitate was visible on the bottom of the culvert at discharging location GC5. A mound of precipitate had accumulated below the outfall and on the streambank of Cross Creek.
- Precipitate was observed along the streambank of Cross Creek from discharging locations GC4 to GC1 off Gould Road.
- 4. At the time of the inspection, major construction activities per the storm water pollution prevention plan (SWPPP) scope of work were completed and all disturbed areas were stabilized. Other construction may still occur but would follow the guidelines set forth in the SWPPP.

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- Best management practices (BMPs) in use include rip rap, catch basins protected by silt fence and straw bales, swales, diversion berms, super silt fence, and check dams.
- 6. The check dam at the end of the swale from the rail spur area and draining to GC5 had been washed out on the western side and was scheduled to be repaired.
- Inspection requirements are being met or exceeded for both permits. Construction 7. storm water inspections occur at a frequency of once per month. Routine facility inspections for industrial storm water were conducted quarterly while activity was occurring at the site. Only annual industrial storm water comprehensive site inspections are conducted during periods of no activity.

No violations of the terms and conditions of the permit were discovered. Please continue to implement permit requirements as operation continues.

If you have any questions or comments, please contact me at (740) 380-5227, or email at alex.delvalle@epa.ohio.gov.

Sincerely,

Alex Del Valle

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Environmental Specialist Division of Surface Water

Southeast District Office

AD/dh

Barbara Nielsen, Manager John Wise, Senior Consultant

ec: Lee Holder, Associate Engineer