



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Director

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MAY 18 2012

ARCADIS U.S., INC.

May 2, 2012

VRP 12:193

Mr. John Broderick
Freeport-McMoRan Copper & Gold
Sierrita Operations
Post Office Box 527
Green Valley, Arizona 85622-0527

RE: *Review of Response to Comments and Revised Work Plan for Training Facility Soil Excavation Project*
Freeport Sierrita Mine
Green Valley, Arizona; Site Code: 100073-03

Dear Mr. Broderick:

The Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) has completed its review of the *Response to Comments* letter from Martha Mottley, Freeport-McMoRan Copper & Gold, dated April 14, 2012, and the *Revised Work Plan for Training Facility Soil Excavation Project*, dated April 17, 2012, prepared by ARCADIS on behalf of Freeport-McMoran Copper and Gold – Sierrita Operations (Sierrita), for the Freeport Sierrita Mine (“Site”).

The response letter and revised work plan:

- Clarifies that Freeport McMoRan will be providing a work plan to perform a Human Health Risk Assessment for the various portions of the Site that are under the VRP.
- Provided a modified Figure 3 containing analytical results for the labeled samples, excavation dimensions for each excavation, and added sample ID CP-13 in its proper location.
- Provided modifications to the sampling plan to increase the number of samples collected in the excavation areas associated with the Training Facility building footprint and the parking lot surrounding the future Training Facility building.
- Clarifies disposition of excavated soil that does not exceed TCLP, nr-SRLs, or GPLs to an onsite dedicated landfill area.

The VRP approves the response letter and the revised work plan as written. As a note of clarification, the VRP points out in response to comment 1R, reference is made to adding site-specific risk assessment text to Section 4.1.1 in the revised work plan. The revised work plan does not contain a Section 4.1.1, however, the referenced text was located and reviewed under Section 4.1 of the revised work plan.

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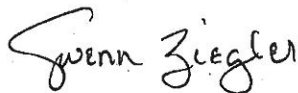
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Please submit a post excavation report containing analysis data for each sample collected and a figure clearly identifying the location of each sample collected.

If you have any questions, please contact me by electronic mail at dt3@azdeq.gov or by telephone at (602) 771-4414.

Respectfully,



Gwenn Ziegler, Project Manager
Voluntary Remediation Program



Danielle Taber, Project Manager
Voluntary Remediation Program

cc: Stuart Brown, Freeport-McMoRan Copper & Gold, Senior Director – Remediation Projects
Martha G. Mottley, Freeport-McMoRan Copper & Gold – Sierrita Operations, Chief
Environmental Engineer
Katy Brantingham, ARCADIS, Project Manager