



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Director

June 22, 2012

VRP 12:229

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

RE: Review of February 2, 2012 Response to Comments
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 Freeport McMoRan Sierrita, Inc. (Sierrita) February 2, 2012 response to comments letter containing Sierrita's responses to ADEQ's October 7, 2011 concerning the *Voluntary Remediation Program Soil and Sediment Characterization Report*. The VRP accepts the responses provided by Sierrita, but has the following comments:

1. Referring to VRP Comment 5a: The VRP appreciates the inclusion of the e-mail received from Ms. Prabha Acharya, Manager of Technical Resources at ADHS. In Ms. Acharya's e-mail she stated "Uranium is not a target compound of EPA method 6020 and therefore, the results by that method must be qualified". The VRP concurs with this assessment and recommends the T2 data qualifier be utilized on the tables and data analysis reports for samples analyzed for uranium. The T2 data qualifier states "Cited ADHS licensed method does not contain this analyte as part of method compound list."
2. Referring to VRP Comment 5b: The VRP appreciates the inclusion of the e-mail received from Ms. Joey Pace addressing the certification issue with ALS Laboratory Group (formerly Paragon Laboratories). The VRP, therefore, accepts the previously approved condition one (1) with the lab successfully obtaining ADHS certification on January 15, 2009. When the groundwater data is submitted for VRP review, the VRP will verify that the data is not skewed in the three quarters following the initial sampling event, which will satisfy condition two (2).

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Mr. John Broderick

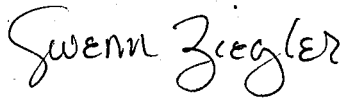
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3. Referring to VRP Comment 14: The VRP clarifies the Ms. Danielle Taber used the inorganic USEPA Contract Laboratory Program National Functional Guidelines (January 2010) (NFGs) in the example submitted in the October 7, 2011 letter. The VRP accepts used of the November 2008 NFGs; however, requests this be referenced appropriately in the revised report.

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