



Janice K. Brewer  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin  
Director

February 26, 2013

VRP 13:165

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

RE: Review of Freeport McMoRan Sierrita, Inc January 8, 2013, "*Response to Comments Letter*" for the *Final Voluntary Remediation Program Soil and Sediment Characterization Report*  
Freeport Sierrita Mine – VRP Site Code 100073-03  
Green Valley, Arizona

Dear Mr. Broderick:

The Arizona Department of Environmental Quality (ADEQ) Waste Program's Division (WPD) Voluntary Remediation Program (VRP) has reviewed the document titled "Response to Comment" letter regarding the Final Voluntary Remediation Program Soil and Sediment Characterization Report. This document was prepared by **Freeport-McMoran Copper and Gold – Sierrita Operations (Sierrita)**. This document was dated January 8, 2013 and was received by ADEQ on January 11, 2013.

There are two main areas that make up the site, the Former Clear Plant Subarea and the Former Esperanza Mill Subarea, within these two areas, eight additional sub-areas have been identified as containing potential contaminants of concern (PCOC). VRP recognizes that sampling events have been conducted in order to collect data to determine the PCOC in each of the ten areas of concern. The data appears to have been evaluated by comparing the soil concentrations to the applicable non-residential Soil Remediation Levels (NRSRLs) The VRP wants to be sure that Sierrita understands and is clear about the process for remediating the soil at the site in accordance with Arizona Administrative Code (A.A.C) Article 2, Soil Remediation Standards. Therefore, the VRP accepts Sierrita's responses, but has the following general comments.

## General Comments:

1. In accordance with Arizona Revised Statute (A.R.S.) § 49-181, the VRP can issue a No Further Action (NFA) determination or a Conditional NFA determination. A Conditional NFA is issued when remediation levels have been achieved through the use of an

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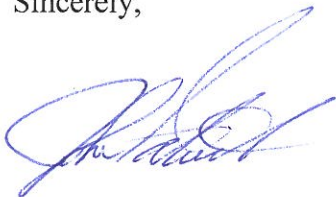
recommended that SPLP samples be collected in order to calculate an alternative GPL for antimony.

5. In addition, please provide and include a table that illustrates how the alternative GPLs were calculated. This should include the "total metal" concentration, SPLP, R-value, etc. This information would be helpful for ADEQ to understand how these alternative GPL were derived.
6. Please include the respective Pro UCL worksheet and the calculation sheet illustrating the generated statistical data. This information would be helpful for ADEQ to understand how the data was categorized and evaluated.
7. Please include an electronic copy of all reports that are submitted.

ADEQ would like to schedule a meeting and/or possibly a site visit in order to evaluate and get a better understand of Sierrita's final cleanup objectives.

If you have questions regarding this correspondence please feel free to contact John Patricki at 602-771-4397 or via electronic mail at [jp10@azdeq.gov](mailto:jp10@azdeq.gov), or Danielle Taber at 602-771-4414 or via electronic mail at [dt3@azdeq.gov](mailto:dt3@azdeq.gov).

Sincerely,



John Patricki, 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  
Clinton D. Beck, Freeport-McMoRan Copper & Gold  
Katy Brantingham, ARCADIS, Project Manager

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*References:*

Arizona Department of Environmental Quality (ADEQ), 1996. A Screening Method to Determine Soil Concentrations Protective of Groundwater Quality

URS, 2012. Final Voluntary Remediation Program (VRP) Soil and Sediment Characterization Report. December, 2012.