

Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

Sent via U.S. Mail

February 2, 2018
VRP 18-119

Mr. David Rhoades
President and General Manager
Freeport-McMoRan Sierrita Inc.
PO Box 527
Green Valley, AZ 85614-0527

RE: ADHS Review of: (1) Sierrita BHHRA, dated June 7, 2016; (2) ADEQ's Comments on the BHHRA, (includes ADEQ/Kleinfelder comments) dated August 18, 2016; and (3) Arcadis's Summary and Response Intentions for Comments, dated December 19, 2017.

Freeport Sierrita Mine
6200 W. Duvall Mine Road
Green Valley, Arizona
VRP Site Code: 100073-03

Dear Mr. Rhoades:

The Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program requested the Arizona Department of Health Services complete a review Freeport-McMoRan Sierrita Inc.'s (FMI's) Baseline Human Health Risk Assessment (BHHRA) dated June 7, 2016, along with ADEQ's August 18, 2016 comments on the BHHRA (inclusive of comments from ADEQ's third-party risk assessor, Kleinfelder), and Arcadis's response to the June 2016 ADEQ/Kleinfelder comments. ADEQ requested ADHS review all of the documents and determine if:

- ADHS concurs with the ADEQ/Kleinfelder comments which Arcadis intends to address in an updated BHHRA;
- ADHS has any additional comments on the BHHRA not previously addressed by ADEQ/Kleinfelder; and
- ADHS requires FMI provide any additional information in an updated BHHRA beyond the comments already made by ADEQ/Kleinfelder.

Based upon a January 2018 review of the above-referenced documents, ADHS responded to ADEQ as follows:

1. ADHS concurs with the ADEQ/Kleinfelder comments FMI intends to address in an updated BHHRA.
2. ADHS does not need any additional ADEQ/Kleinfelder comments addressed in an updated BHHRA.

Main Office

1110 West Washington Street • Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

www.azdeq.gov

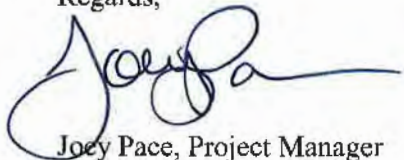
printed on recycled paper

3. ADHS has the following comment on the BHHRA not previously addressed by ADEQ/Kleinfelder which should be addressed in a revised BHHRA:

Section 6.3.5 of BHHRA: Regarding lead exposure, the Centers for Disease Control and Prevention (CDC) and Agency for Toxic Substances and Disease Registry (ATSDR) no longer accept 10 micrograms per deciliter ($\mu\text{g}/\text{dL}$) as the input for representing elevated blood lead levels. In 2012, the CDC adopted the 97.5 percentile of blood lead levels for children aged 1 through 5 years in the National Health and Nutrition Examination Survey as the reference value for identifying children and environments associated with lead-exposure hazards. The 97.5 percentile is currently 5 $\mu\text{g}/\text{dL}$. ADHS's current follow-up level is 5 $\mu\text{g}/\text{dL}$ for children. ADHS suggests including 5 $\mu\text{g}/\text{dL}$ in the assessment.

Please be advised, with ADHS as the regulatory reviewer of the revised BHHRA, the comment above will need to be satisfactorily addressed, along with the other comments defined in the December 2017 *Summary and Response Intentions for Comments*, for ADHS to approve the applicability and findings in a revised BHHRA.

Regards,



Joey Pace, Project Manager
Voluntary Remediation Program

cc: Stuart Brown, FMI, Senior Director, Remediation Projects – *sent via email*
William Hart, FMI Sierrita Operations, Senior Environmental Specialist – *sent via email*
David Caskey, FMI Sierrita Operations, Chief Environmental Engineer – *sent via email*
Katy Brantingham, ARCADIS, Project Manager – *sent via email*