



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

Sent via U.S. Mail

February 16, 2018
VRP 18-124

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

RE: ADEQ/ADHS February 2018 Comments on Sierrita BHHRA
Freeport Sierrita Mine
6200 W. Duvall Mine Road
Green Valley, Arizona
VRP Site Code: 100073-03

Dear Mr. Rhoades:

On February 2, 2018, the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program issued a letter (the Letter) to Freeport-McMoRan Sierrita Inc. (FMI) which addressed comments received by ADEQ from the Arizona Department of Health Services (ADHS) regarding ADHS's review of the Freeport Sierrita Mine Baseline Human Health Risk Assessment (BHHRA) dated June 7, 2016. The Letter cites ADHS's recommendation for using the Centers for Disease Control and Agency for Toxic Substances and Disease Registry elevated blood lead level of 5 micrograms per deciliter ($\mu\text{g}/\text{dL}$). The Letter further states FMI would need to incorporate this elevated blood lead level into the BHHRA to receive ADHS concurrence on the BHHRA.

After the Letter was issued, ADEQ and ADHS communicated regarding the use of this input in environmental risk assessments. On February 14, 2018, ADEQ received the following amended comment from ADHS:

"ADHS will be adhering to the significant blood lead levels as listed in Arizona Administrative Code [A.A.C.]... of 10 $\mu\text{g}/\text{dL}$ for childhood level and 25 $\mu\text{g}/\text{dL}$ for an adult in accordance with the definitions outlined in [A.A.C.] R9-4-301.

...[Regarding] receptors "residential adult, trespasser, worker; etc." will be considered adults per the definition of an adult if over 16 years of age with the caveat (which ADHS is still making final determinations) that the childhood level of 10 $\mu\text{g}/\text{dL}$ will be applied to pregnant women as part of the risk assessment."

Please note, this comment supersedes the blood lead level comment cited in the Letter. As such, FMI may proceed with preparing the revised BHHRA based on the blood lead level inputs of 10 $\mu\text{g}/\text{dL}$ for children and 25 $\mu\text{g}/\text{dL}$ for adult, as defined in A.A.C. R9-4-301, and clarified above.

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Please let me know if there are any questions.

Regards,



Joey Pace, Project Manager
Voluntary Remediation Program

cc: Dave Gosen, FMI – *sent via email*
William Hart, FMI – *sent via email*
David Caskey, FMI – *sent via email*
Katy Brantingham, ARCADIS – *sent via email*