ENGINEERING CHANGE NOTICE

Project: Satralloy Site Slag Removal and Consolidation Interim Action	**ECN No.:** 001
WSP Project No.: 31405041.036	**Date:** July 16, 2024
Engineering Change Notice Name: Clean Soil Fill Amendment	**Contract No.:** 35862100006-001
Project Feature: Clean Soil Fill Limestone Amendment	
Affected Documents: Specification Section 02200, Parts 2.2.B and 3.4	
Description of Change: The requirement to amend clean soil fill obtained from the Former Mine Area borrow areas with limestone is no longer applicable (i.e., Specification Section 02200, Parts 2.2.B and 3.4 are no longer applicable). Clean soil fill obtained from the Former Mine Area borrow areas can be placed directly as described in Part 3.5, without limestone amendment.	
Justification for Change: A subsequent evaluation determined that limestone amendment would not be cost effective and was unnecessary to meet project objectives.	
☑ Significant Design Change – Regulatory approval of this ECN is required prior to construction (see attached letter notifying OEPA of the change) ☐ Insignificant Design Change – No regulatory approval is required	
Prepared by:	
Approvals: WSP Design Engineer: Vanessa Nancarrow — Date: July 16, 2024 WSP Project Director: — Date: July 16, 2024 WSP Construction Manager: — Date: July 16, 2024 CAMC Program Manager: Approved via email — Date: July 30, 2024 OEPA Site Coordinator: See attached letter — Date: 6/7/2024 [letter date]	

Distribution:

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FREEPORT-McMoRan

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June 7, 2024

Kevin O'Hara
Site Coordinator
Division of Environmental Response and Revitalization
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138

RE: Revision to Approach on Borrow Soil
Former Satralloy Site

Dear Kevin,

The WSP letter dated March 8, 2024, reported on characterization of potential borrow soil at the Former Satralloy Site (the Site). The characterization addressed potential acid generation and potential sulfate leaching. The letter evaluated both and found that sulfate leaching would not be a concern, but the potential borrow soils had varying potential for acid generation. The letter suggested limestone addition to alleviate potential risk of adverse effects of potential acidic stormwater drainage from the borrow soil. It is important to note that it is not certain that there would be adverse effects from use of this borrow soil without limestone, but rather only a potential risk.

The proposal to add limestone was made before the cost of the addition was evaluated. We have now estimated the limestone addition cost. The volume of soil to be excavated is approximately 922,000 cubic yards. To amend all of the soil with limestone would result in considerable increase in the cost to the project. Upon reconsideration, the potential benefit of limestone addition to address a problem that is only potential is not justified by the high cost. Instead, we will monitor the situation during construction and include monitoring to detect potential negative effects of any acidic stormwater runoff in the Operations, Maintenance and Monitoring Plan that will be developed for the site. If the monitoring detects such potential negative effects, CAMC will confer with Ohio EPA on appropriate contingency plans or measures.

If you have any questions regarding this letter, please do not hesitate to contact me directly.

Sincerely,

Barbara K. Nielsen
Manager, Remediation Projects