FREEPORT-MCMORAN
Cyprus Amax Minerals Company

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Maria Galanti
Site Coordinator
Division of Environmental Response and Revitalization
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138

RE: Amendment No. 5 to the Interim Action Workplan Former Satralloy Site

Dear Ms. Galanti:

Cyprus Amax Minerals Company (Cyprus) would like to amend the Interim Action Workplan in accordance with the Consent Order for Preliminary Injunction (COPI) Section VI (Interim Action) 13(d) and Section XII (Review of Submittals): "All work plans, reports, or other items required to be submitted to Ohio EPA under this COPI, including any approved additional Work, shall, upon approval by Ohio EPA, be deemed to be incorporated in and made an enforceable part of this COPI."

AMENDMENT SCOPE

Demolition of buildings at the Former Satralloy Site (the Site) was included in the original workplan, but implementation of the demolition was postponed. The attached revised workplan for demolition has been updated to reflect current conditions.

Per Amendment No. 3 of the workplan, chromium-containing dust collected during interim action was placed in bags staged in the North Mill Building (NMB). This dust is in waterproof "SuperSacks".

SPLP analyses on dust samples (RI Table 4.2-1) suggest that the dust collected from the NMB will have a TCLP value for chromium greater than the hazardous waste characteristic value of 5 mg/L. SPLP analyses on dust from the South Mill Building (SMB) show that it has low leaching potential and suggest that SMB dust will be non-hazardous based on TCLP. Therefore, Cyprus proposes that NMB dust will be characterized and, if the TCLP for chromium is greater than 5 mg/L as expected, dispose of NMB dust off-site as hazardous waste. Cyprus proposes that bags of SMB dust that is non-hazardous per TCLP analysis be moved to a slag pile to be managed with the slag during final remediation. For comparison, see slag SPLP results in RI Table 4.1-1C.

SCHEDULE

Cyprus proposes to begin the work in the summer of 2019.

CLOSING

Cyprus respectfully requests approval of this amendment. Please call me if you have any questions.

Sincerely,

Barbara K. Nielsen
Manager, Remediation Projects