



RE: Schedule for Implementation of Modified COPI

From kevin.ohara@epa.ohio.gov <kevin.ohara@epa.ohio.gov>
Date Mon 5/5/2025 10:20 AM
To Anderson, Steve <steve.anderson3@wsp.com>
Cc Barbara Nielsen (bnielsen@fmi.com) <bnielsen@fmi.com>; Sisson, Jordan <jsisson@fmi.com>; Barbich, Brent <brent.barbich@wsp.com>; Beul, Cameron <cameron.beul@wsp.com>; Stodola, Laura <laura.stodola@wsp.com>

Thank you, Steve....this is very helpful.

-Kevin

From: Anderson, Steve <steve.anderson3@wsp.com>
Sent: Friday, May 2, 2025 4:53 PM
To: Ohara, Kevin <kevin.ohara@epa.ohio.gov>
Cc: Barbara Nielsen (bnielsen@fmi.com) <bnielsen@fmi.com>; Sisson, Jordan <jsisson@fmi.com>; Barbich, Brent <brent.barbich@wsp.com>; Beul, Cameron <cameron.beul@wsp.com>; Stodola, Laura <laura.stodola@wsp.com>
Subject: Schedule for Implementation of Modified COPI

Good afternoon Kevin,

On behalf of Cyprus Amax Minerals Company, the following is the implementation schedule required by the Modified Consent Order for Preliminary Injunction for the Former Satralloy Site (dated April 3, 2025).

The Modified Consent Order requires several types of Work at the Former Satralloy Site (Site). Some of this Work can only begin following completion of certain interim action activities (e.g., slag consolidation). The interim action activities are dependent on a number of factors, such as weather, that are beyond the control of Cyprus Amax Minerals Company. In addition, some vegetation planting must be done in the proper season. Therefore, this schedule is described using "trigger" events that must be completed, and the duration of the consent order activities following the trigger event.

This schedule covers the Work specified in three subsections of Section III.1 of the Modified Consent Order:

- b. On-Property Improvements to Cover Crop/Plantings. This work will be performed incrementally as slag removal and grading is finished in portions of the Site. Overall, this planting will be completed within one year following completion of slag removal and construction of

the consolidated slag stockpile. The tables below provide the seed mixes, sapling species, and application rates for the enhanced seeding and planting areas.

- c. On-Property Wetlands Increases or Improvements. This work will be completed within one year following completion of slag removal and construction of the consolidated slag stockpile.
- d. On-Property Conservation/Protection of Riparian Habitat. The schedule for establishment of an environmental covenant is specified in the Modified Consent Order. Habitat enhancements in the area disturbed by the utility company will be completed within nine months of the effective date of the Modified Consent Order. During this time period, portions of this area that have not revegetated naturally will be planted with a native grass seed mix.

Table 1. Ground Cover Seed Mix (Enhanced Woodland Area) Herbaceous Application Rates

Seeds	Recommended Minimum Species	Pure Live Seed (PLS) lbs/acre	Total PLS lbs
Native Grasses			
Canadian wild rye (<i>Elymus canadensis</i>)	Minimum 2 perennial grasses	2.5	88.5
Virginia wild rye (<i>Elymus virginicus</i>)		3.5	123.9
Annual Ryegrass (<i>Lolium multiflorum</i>)		15	531
Legumes			
Partridge Pea (<i>Chamaecrista fasciculata</i>)	Minimum 2 species At least 30% of total mix	2	70.8
Alsike clover (<i>Trifolium hybridum</i>)		0.5	17.7
Birdsfoot trefoil (<i>Lotus corniculatus</i>)		1	35.4
Crimson clover (<i>Trifolium incarnatum</i>)		3	106.2
Ladino clover (<i>Trifolium repens</i>)		0.5	17.7
Red clover (<i>Trifolium pratense</i>)		2	70.8
Total		30 lbs/acre	1,062 lbs

Table 2. Reforestation Woody Species Application Rates

Species	Application Rate per Acre	Total Seedlings*
Tree species		
<i>American elm (<i>Ulmus americana</i>)</i>		
<i>American sycamore (<i>Platanus occidentalis</i>)</i>	600-681 seedlings/acre	21,240-24,107 seedlings
<i>Black locust (<i>Robinia pseudoacacia</i>)</i>	Use 2-year seedlings	
<i>Eastern cottonwood (<i>Populus deltoides</i>)</i>	Minimum of 6 tree species	
<i>Eastern hemlock (<i>Tsuga canadensis</i>)</i>		
<i>Ohio buckeye (<i>Aesculus glabra</i>)</i>		
<i>Shagbark hickory (<i>Carya ovata</i>)</i>		

Species	Application Rate per Acre	Total Seedlings*
Silver maple (<i>Acer saccharinum</i>)		
Sugar maple (<i>Acer saccharum</i>)		
White oak (<i>Quercus alba</i>)		
<i>Understory woody vegetation</i>		
Common elderberry (<i>Sambucus nigra</i>)		
Black raspberry (<i>Rubus occidentalis</i>)		
Black chokeberry (<i>Aronia Melancarpa</i>)	60	
Bristly locust (<i>Robinia Hispida</i>)		
American cranberrybush (<i>Viburnum Opulus</i>)		
Thicket serviceberry (<i>Amelanchier Canadensis</i>)		

*Based on 35.4-acre Reforestation Area

Table 3. Seed Mix (Open Meadow Areas) Herbaceous Application Rates

Seeds	Recommended Max Allowed % ¹	Pure Live Seed (PLS) lbs/acre	Total PLS lbs ²
<i>Native Wildflowers</i>			
New England Aster (<i>Aster novae-angliae</i>)	10		
Partridge Pea (<i>Cassia fasciculata</i>)	10		
Greyhead Coneflower (<i>Ratibida pinnata</i>)	10		
Orange Coneflower (<i>Rudbekia fulgida</i>)	10		
Prairie Dock (<i>Silphium terebinthinaceum</i>)	10		
Whorled Rosinweed (<i>Silphium trifoliatum</i>)	10		
Stiff Goldenrod (<i>Solidago rigida</i>)	10		
Monarch butterfly planting species list	Butterfly-weed (<i>Asclepias tuberosa</i>)	25	14.8 Ideally, 60% of the wildflower mix should be composed of species from the monarch butterfly planting species list 910.2
	Purple Coneflower (<i>Echinacea purpurea</i>)	10	
	Rattlesnake Master (<i>Eryngium yuccifolium</i>)	10	
	Ox-eye Sunflower (<i>Heliopsis helianthoides</i>)	10	
	Wild Bergamot (<i>Monarda fistulosa</i>)	10	
<i>Native Grasses</i>			
Big Bluestem (<i>Andropogon gerardii</i>)		2	123.0

Seeds	Recommended Max Allowed % ¹	Pure Live Seed (PLS) lbs/acre	Total PLS lbs ²
Little Bluestem (<i>Schizachyrium scoparium</i>)		3	184.5
Indiangrass (<i>Sorghastrum nutans</i>)		1	61.5
Annual Ryegrass (<i>Lolium multiflorum</i>)		40	2,460.0
Total		60.8 lbs/acre	3,739.20 lbs

¹ This is a suggested maximum percentage of a given species among the total composition.

² Based on the 61.5-acre open meadow seeding areas.

Table 4. Seed Mix (Open Meadow Areas) Milkweed Application Rates

Seeds	Seeding Method PLS lbs/acre	Total PLS lbs ¹	Planting Method Plugs/acre	Total plugs ¹
Swamp milkweed (<i>Asclepias incarnata</i>)				
Purple milkweed (<i>Asclepias purpurascens</i>)	0.9 lbs/acre			
Sullivant's milkweed (<i>Asclepias sullivantii</i>)				
Common milkweed (<i>Asclepias syriaca</i>)				
Whorled milkweed (<i>Asclepias verticillata</i>)	Minimum 1 <i>Asclepias</i> species in mix	55.35	400 plugs/acre	24,040

¹ Based on the 61.5-acre open meadow seeding areas.

Please let Barb or me know if you have any questions. We look forward to Ohio EPA review and approval.

Kind regards,
Steve

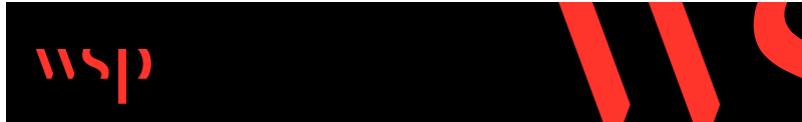
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