



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

June 14, 2013

VRP 13:308

Mr. John Broderick
Freeport-McMoRan Copper & Gold
Sierrita Operations
Post Office Box 527
Green Valley, Arizona 85622-0527

RE: NO FURTHER ACTION (NFA) APPROVAL - SOIL
Freeport Sierrita, Inc – Clear Plant - Training Facility Area
6200 W. Duval Mine Rd.
Post Office Box 527
Green Valley, Arizona 85622-0527
VRP Site Code: 100073-03

Dear Mr. Broderick:

The Arizona Department of Environmental Quality (ADEQ) Waste Program's Division (WPD) Voluntary Remediation Program (VRP) has reviewed the document titled *Seven Element Request for No Further Action for the Freeport McMoRan Sierrita Inc, Former CLEAR Plant Training Facility* (Report). This report was prepared and submitted by ARCADIS US, Inc on behalf of Freeport-McMoRan Copper & Gold (volunteer) as a requirement of Arizona Revised Statute (A.R.S.) § 49-181. This report was dated and received by ADEQ on March 1, 2013.

ADEQ has determined the Request for No Further Action (NFA) meets the requirements of A.R.S. § 49 -181 and is approved.

The approval for No Further Action determination applies only to the soil on the portion of the site known as the Former CLEAR Plant Training Facility, and more specifically described by the following latitude/longitude coordinates and respective distances: From the point of beginning at 31.87864228, -111.0992760, a distance of 206.57 feet to 31.87807462, -111.0992819 a distance of 238.59 feet to 31.87807672, -111.0985167 a distance of 206.54 feet to 31.87864436, -111.0985189 and a distance of 235.06 feet to the point of beginning. The approximate area subject to the NFA is illustrated on the attached map (Figure 1).

Please note that the NFA is granted with the limitations described by A.R.S. §§ 49-181(E) and 49-181(F) and does not address any other area of land, groundwater, or any other contaminants not specifically defined within this NFA.

The NFA Determination was based on soil sampling activities, remediation, and confirmation sampling results documented in the Reports titled *Voluntary Remediation Program Soil and Sediment*

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

Printed on recycled paper

Characterization Report, and Voluntary Remediation Program: Revised Former Clear Plant Area Soil Excavation and Tier I Screening Risk Report dated December 2012 and January 16, 2013, respectively.

The soil NFA determination is for the area depicted on the attached Figure 1 and for the following constituents (see attached table): antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, manganese, mercury, molybdenum, nickel, selenium, thallium, uranium and zinc.

This NFA determination is based on the following:

1. During site characterization and/or remediation activities, soil samples were collected and analyzed for the following:
 - Metals by EPA Method 6010B and 6020
2. Laboratory analytical results of previous sampling activities and confirmation soil samples that were collected after remediation (excavation) confirmed that the following mining related metals: antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, manganese, mercury, molybdenum, nickel, selenium, thallium, uranium and zinc are below residential Soil Remediation Levels (SRLs) prescribed in Arizona Administrative Code Title 18, Chapter 7 Article 2.
3. Per A.R.S. § 49-176(B), the applicant provided general public notice of the Request for No Further Action Determination. The public notice was placed in the *Green Valley Newspaper* on April 17, 2013. The public comment period ended on May 20, 2013. No comments were received by either the applicant or ADEQ.

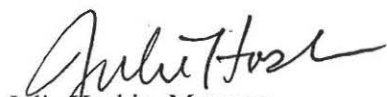
CONDITIONS OF NO FURTHER ACTION

In accordance with A.R.S. § 49-181(E), the department may rescind or amend the determination of no further action and require remedial action pursuant to applicable law for any of the following reasons:

1. On discovery of new information that, based on the criteria in subsection C of this section, would result in the potential denial of a no further action request.
2. That information submitted pursuant to subsection A or B of this section was inaccurate, misleading, or incomplete.
3. The reopening of an investigation or the taking of a remedial action is necessary to respond to a release or the threat of a release of a contaminant that may present an imminent and substantial danger to the public health or welfare of the environment.

Please provide a copy of this letter to your consultant.

Sincerely,



Julie Hoskin, Manager
Voluntary Remediation Program
Remedial Projects Section

Mr. John Broderick
June 14, 2013
Page 3 of 4

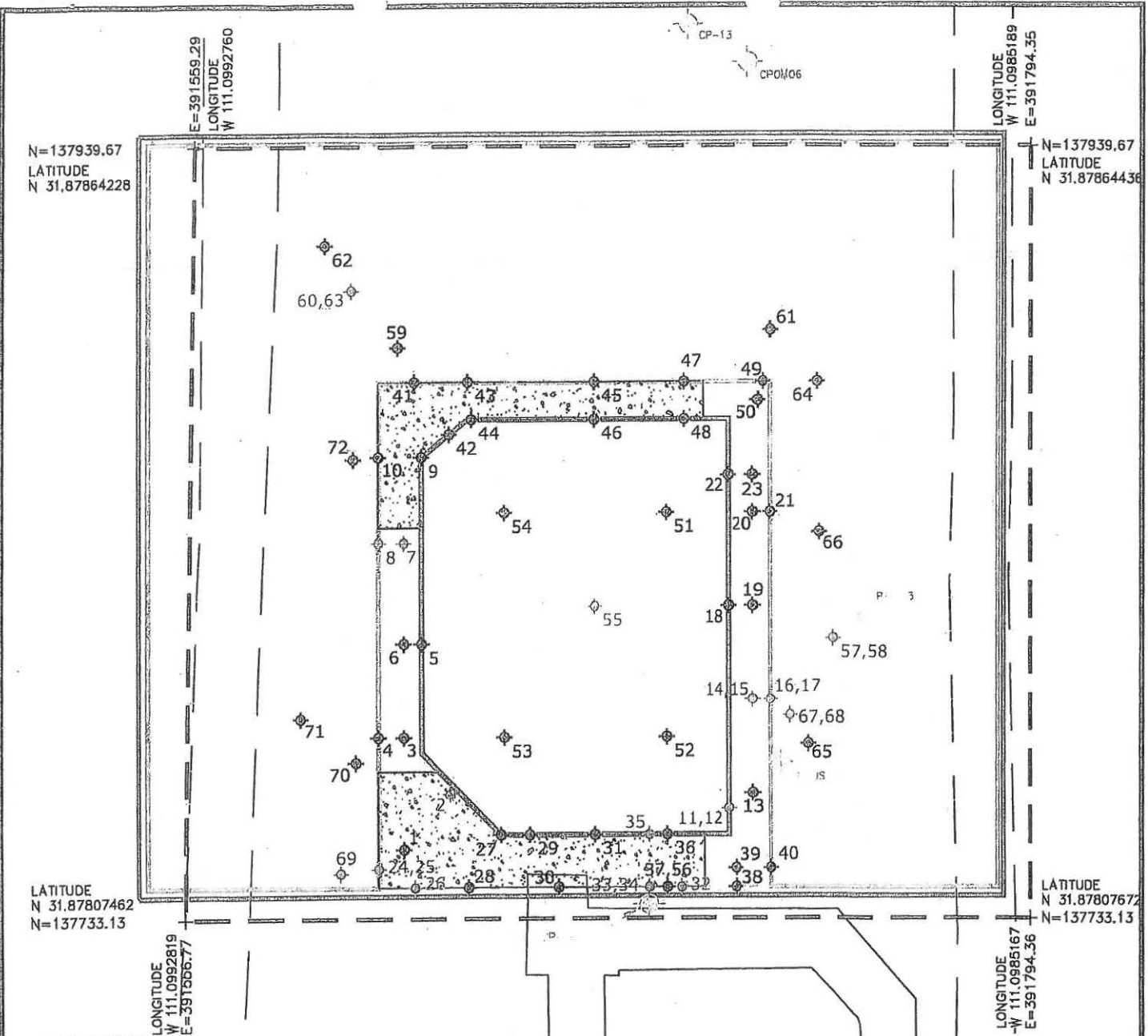
VRP 13:308

cc: Martha Mottley, Freeport McMoRan Copper & Gold
Kanyembo Katapa, Freeport McMoRan Copper & Gold

Attachments: Figure 1 – NFA Boundary Area
Table 1 – Specific Contaminants for NFA Determination

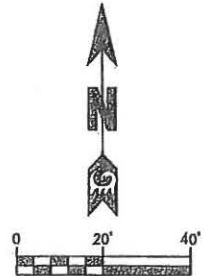
Table 1: Freeport McMoRan Sierrita Inc - Former Clear Plant Training Facility – Soil Sampling for NFA Determination

<i>Constituent</i>	<i>Analytical Method</i>	<i>Analytical Method</i>	<i>Analysis Date</i>	<i>Name of Laboratory</i>
Antimony		6020	August – October 2004	ALS Laboratory Group
Arsenic		6020	August – October 2004	ALS Laboratory Group
Barium	6010B		August – October 2004	ALS Laboratory Group
Beryllium	6010B		August – October 2004	ALS Laboratory Group
Cadmium	6010B		August – October 2004	ALS Laboratory Group
Chromium	6010B		August – October 2004	ALS Laboratory Group
Cobalt	6010B		August – October 2004	ALS Laboratory Group
Copper	6010B		August – October 2004	ALS Laboratory Group
Lead		6020	August – October 2004	ALS Laboratory Group
Manganese	6010B		August – October 2004	ALS Laboratory Group
Mercury	M7471		August – October 2004	ALS Laboratory Group
Molybdenum	6010B		August – October 2004	ALS Laboratory Group
Nickel	6010B		August – October 2004	ALS Laboratory Group
Selenium		6020	August – October 2004	ALS Laboratory Group
Thallium		6020	August – October 2004	ALS Laboratory Group
Zinc	6010B		August – October 2004	ALS Laboratory Group
Antimony		6020	July – August 2008	ACZ Laboratories
Arsenic		6020	July – August 2008	ACZ Laboratories
Barium	6010B		July – August 2008	ACZ Laboratories
Beryllium	6010B		July – August 2008	ACZ Laboratories
Cadmium	6010B		July – August 2008	ACZ Laboratories
Chromium	6010B		July – August 2008	ACZ Laboratories
Cobalt	6010B		July – August 2008	ACZ Laboratories
Copper	6010B		July – August 2008	ACZ Laboratories
Lead		6020	July – August 2008	ACZ Laboratories
Manganese	6010B		July – August 2008	ACZ Laboratories
Mercury	M7471		July – August 2008	ACZ Laboratories
Molybdenum	6010B		July – August 2008	ACZ Laboratories
Nickel	6010B		July – August 2008	ACZ Laboratories
Selenium		6020	July – August 2008	ACZ Laboratories
Thallium		6020	July – August 2008	ACZ Laboratories
Uranium		6020	July – August 2008	ACZ Laboratories
Zinc	6010B		July – August 2008	ACZ Laboratories
Arsenic	6010B		May 2012	SVL Analytical
Copper	6010B		May 2012	SVL Analytical
Lead	6010B		May 2012	SVL Analytical



LEGEND

- Former CLEAR Plant Area
- Soil Sample
- Former CLEAR Plant Area Soil Confirmation Sample
- Former CLEAR Plant Area Soil Replacement Sample following Over-Excavation
- Boundary for NO FURTHER ACTION Area
- APPROXIMATE TRAINING FACILITY AND PARKING LOT EXTENT
- PARKING LOT AREA
- BUILDING FOOTPRINT AREA
- EXPOSED CONCRETE AREA



FREEPORT MCMORAN SIERRITA OPERATIONS PIMA COUNTY, ARIZONA	
TRAINING FACILITY AND SOIL SAMPLES LOCATION MAP Former CLEAR Plant Area Soil Excavation Report	
	1