



Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

*Sent via Certified Mail*

April 22, 2016  
VRP 16-204

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

**RE: No Further Action Determination for Arsenic, Copper, and Lead in Soil**  
Freeport Sierrita Inc. – Clear Plant Paving Project  
6200 W. Duvall Mine Road, Green Valley, Arizona  
VRP Site Code: 100073-03

Dear Mr. Rhoades:

The Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) hereby grants Freeport-McMoRan Inc. Sierrita Operations (FMI), a No Further Action (NFA) determination for soil for the CLEAR Plant Paving Project, which encompasses two areas of the FMI Sierrita Mine, located at 6200 W. Duval Mine Rd in Green Valley, Arizona (the Site). The areas eligible for the NFA are depicted on **Figure 1**. Please note the NFA is granted with the limitations described under Arizona Revised Statutes (A.R.S.) §§ 49-181(E) and 49-181(F) and does not address groundwater, surface water, other media, or any other area of land.

The NFA determination is for the following metals in soil: arsenic, copper, and lead. A table listing the contaminants subject to the NFA determination and the respective site-specific sampling information is attached and titled *Contaminants Subject to NFA Determination (Table 1)*.

The NFA Determination was based on the following:

1. Between May 19, 2015 and June 19, 2015, FMI collected 29 soil samples for comparison with the residential Soil Remediation Levels (rSRLs) and Groundwater Protection Levels (GPLs). FMI collected two samples from the septic tank leach field in the southern paving area, 10 samples from the northern paving area, and 17 samples from the southern paving area. FMI shipped the soil samples to SVL Laboratories for analysis via United States Environmental Protection Agency Method (USEPA) 6010B for arsenic, copper, and lead.
2. FMI ran a Tier I Screening Risk Evaluation to establish an exposure point concentration (EPC) for arsenic, copper, and lead. The EPC selected for each constituent was the lesser of the maximum detected concentration versus the 95% upper confidence limit (UCL). For all three constituents, the 95% UCL was lower than the maximum detected concentration for each respective constituent. As such, the 95% UCLs were selected as the EPCs for all three