



Freeport-McMoRan Sierrita Inc.
6200 W. Duval Mine Rd.
PO Box 527
Green Valley, Arizona 85622-0527

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PIMA COUNTY

APR 4 2016

DEPARTMENT OF
ENVIRONMENTAL QUALITY

April 1, 2016

**Via Facsimile and
Certified Mail: 7015 1520 0002 5365 7904**

Return Receipt Requested

Mr. Dustin Fitzpatrick
Compliance Supervisor
Pima County Department of Environmental Quality
33 N Stone Ave, Suite 730
Tucson, Arizona 85701

**Re: Opportunity to Correct # PC 1602-106
Freeport-McMoRan Sierrita Inc., Title V Air Quality Permit # 6067**

Dear Mr. Fitzpatrick:

Freeport-McMoRan Sierrita Inc. (Sierrita) is in receipt of the Pima County Department of Environmental Quality (PDEQ) Opportunity to Correct notice, dated March 2, 2016, relating to fugitive dust at Sierrita's tailings impoundment. As directed by that notice, Sierrita is submitting this response outlining corrective actions to be taken to achieve and maintain compliance with PDEQ Air Quality Permit No. 6067, Attachment B.II.E.1 during high wind events.

As previously discussed with PDEQ, Sierrita employs several measures to control fugitive dust from the tailings impoundment. These methods are largely designed to stabilize the surface area, with wetting and the use of chemical dust suppressants being the principal means of control. Given the size of the tailings impoundment, weather conditions, and the nature of high-wind events that can overwhelm currently available control measures, the control of windblown dust presents unique challenges. Accordingly, as part of Sierrita's commitment to dust control at the tailings impoundment, Sierrita is continuously investigating new technologies and innovative control methods. For example, Sierrita's tailings group is currently working with our parent corporation's newly developed "Manager Source & Migration Control Environmental Technology/Life Cycle Analysis" team, which is studying the effectiveness of various types of manufactured dust suppressants at several Freeport-McMoRan, Inc. sites. In addition, Sierrita is always looking for possible ways to improve current control measures by evaluating our practices and procedures. Based on our review of the January 31, 2016 event, we have identified the following actions that have or will be taken to improve dust control at the tailings impoundment during high wind events.

New Standard Operating Procedure (SOP) for Surface Inspections.

To ensure the ability to conduct timely and effective surface inspections, Sierrita has revised tailings (SOP), which outlines the process for selecting areas for inspection; completing the inspection form; and identifying surface conditions (wet, recently crusted, breaking down, sanded material accumulating on surface, etc.), weather conditions, controls currently in place (MgCl₂ recently applied, recent deposition in area, etc.), and any recommended actions as a result of the inspection (MgCl₂ application, water trucks, moving deposition to area). Sierrita will require all tailings employees to be trained and available to perform surface inspections. This should allow for quicker response times in the event circumstances (e.g., weather events) warrant evaluation or re-evaluation of tailings impoundment surface conditions to identify areas that may be susceptible to high wind events and require additional action.

Improved Project Planning Coordination

To evaluate stability of the tailings impoundment and how any future work may impact stability, Sierrita hires contractors to conduct surveys (i.e., drilling projects) on various areas of the impoundment. In preparation for these projects, the area must be dry and stable enough to mobilize the drilling equipment. To minimize the time these areas may be susceptible to high wind events, the Environmental Department will coordinate with operation departments on project planning and implementation. As part of any such project affecting the tailings impoundment, contingency plans will be put in place to address high wind events predicted by weather forecasts.

Personnel Scheduling

Notwithstanding our reduction of workforce due to production curtailment, Sierrita will continue to schedule necessary personnel according to weather forecasts and surface conditions on the tailings impoundment. Sierrita has approved overtime pay for employees at the tailings impoundment to work late on windy days and to work longer days on weekends as necessary to assist in dust control efforts. The availability of these employees will help ensure commensurate measures (applying MgCl₂ or water, moving deposition, etc.) are taken to address high wind events.

Improved Communication between Tailings and Environmental Departments

To improve control measures and help minimize response times, Sierrita will improve communication between the Tailings and Environmental Departments. First, Environmental Department personnel will be required at Tailings Department “line-out” meetings. The objective of these meetings is to discuss safety concerns, environmental issues, and to review the day’s activities. Participation in these meetings by Environmental Department personnel will help clarify dust control procedures and practices, facilitate the identification of possible improvements, and ensure that obligations are being met (e.g., confirmation of surface inspections and any follow-up action). The Tailings Department will also designate a weekend “on call” supervisor, which will be included on the “Site Weekend Duty Personnel.” This should ensure requisite expertise is available on weekends when staff levels are typically reduced.

Reduction in Travel Distances for Vehicles Applying Dust Suppressants

Depending on the location of MgCl₂ and water applications on and around the tailings impoundment, there may be a large distance required to be traveled to refill all-track

vehicles and water trucks. To reduce travel time and allow for quicker application of dust suppressants, water trucks will be used to haul MgCl₂ to areas where all-track vehicles are operating. We will also begin using fire hoses to apply MgCl₂ to the inner perimeter areas of the tailings impoundment, if necessary. In addition, a proposal is currently under review in Sierrita's Management of Change process to move the location of Water Stand Pipes to areas in closer proximity to the tailings impoundment, thereby reducing travel times.

Minimize Delays Due to Equipment Failures

To help minimize delays from unexpected failures and malfunctions of equipment used for dust control (e.g., tracks and water trucks), Sierrita will coordinate with Arnold Machinery, the equipment maintenance contractor, to be on call during high-wind days to ensure quick repairs of critical dust control equipment if necessary.

Improved Identification and Management of "Hot Spots"

In preparation for high wind events, tailings personnel perform surface inspections and address "hot spots" (i.e., areas that may be particularly susceptible to windblown dust) as they are identified. In some cases, however, another area (not previously identified) may become problematic during a high wind event. While these areas often inherently difficult to manage given the timing of their identification and the location (within the interior of the tailings impoundment, surrounded by very wet material or stabilized areas, etc.), Sierrita is working to improve the identification of hot spots prior to and during high-wind events, and to strategically stage MgCl₂ and tracks around the tailings impoundment perimeter to facilitate better (and more timely) access to the interior of the impoundment.

As illustrated above, Sierrita is committed to continuous improvement of its dust control measures at the tailings impoundment. If there are additional concerns or questions, please contact Bryce Cooke at (520) 393-2419.

Sincerely,



Bryce Cooke, Senior Environmental Air Scientist

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Certification of Truth, Accuracy and Completeness

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

David Rhoades, President and General Manager



(signature)

4/1/2016

(date)