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Ursula Kramer Nelson, P.E.
Director

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October 23, 2019

Freeport-McMoRan Sierrita, Inc.
Attn: David Rhoades, President & General Manager
6200 W. Duval Mine Rd.
Green Valley, AZ 85629

Sent by Email
drhoades@fmi.com

OPPORTUNITY TO CORRECT # PC1910-033

Dear Mr. Rhoades,

On October 8, 2019, October 9, 2019, and October 10, 2019 representatives of the Pima County Department of Environmental Quality (PDEQ) responded to a fugitive dust complaint at Freeport-McMoRan Sierrita Incorporated (FMSI) located at 6200 W. Duval Mine Rd operating under PDEQ Air Quality Operating Permit No. 6067. During the inspection on October 9, 2019 the following compliance deficiencies of Permit No. 6067 were observed:

- **Pursuant to Attachment B Condition II.E.1 and PCC 17.16.050.D**, *The permittee shall not cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne. Sources may be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken.*
- **Pursuant to Attachment B Condition XIX.B.1.a and PCC 17.16.050.B**, *The permittee shall not cause, allow or permit visible emissions from any fugitive dust source in excess of 20% opacity measured in accordance with EPA Reference Method.*
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Freeport McMoRan Sierrita Incorporated reported permit deviations from October 8, 2019 and October 9, 2019 via phone call to PDEQ within 24 hours of each fugitive dust event respectively. Permit deviation reports were submitted via email to PDEQ with 72 hours of each event. Freeport-McMoRan Sierrita Incorporated did not conduct Method 9 observations due to the position of the sun being outside the 140 sector to the observer's back.

PDEQ Air Program determined that an opportunity to correct these deficiencies will be afforded to Freeport-McMoRan Sierrita Incorporated. Within **thirty (30)** days of the date of this letter, please submit to PDEQ a written response outlining the corrective actions to be taken to achieve and maintain compliance with the cited deficiencies. PDEQ also requests documents that would provide the tailings impoundment inspections and activities as well as All-track and water truck

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activities, and any other relevant documentation from September 30, 2019 to October 10, 2019. The inspection reports are attached for your reference. If you have questions, please contact me at (520) 724-7400. PDEQ looks forward to working with you to achieve compliance.

Sincerely,

A handwritten signature in black ink, appearing to read 'JR', with a long horizontal flourish extending to the right.

Jacqueline Ronstadt
Air Compliance Manager

Attachment: Inspection Report dated October 8, 2019
Inspection Report dated October 9, 2019
Inspection Report dated October 10, 2019

cc: PDEQ File #: 1910-033