



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

March 25, 2019

**Via Email: [Air.Permits@pima.gov](mailto:Air.Permits@pima.gov) and  
Certified Mail: 7015 1520 0002 5365 9789**

Mr. Dustin Fitzpatrick  
Air Compliance Manager  
Pima County Department of Environmental Quality  
33 N Stone Ave, Suite 700  
Tucson, Arizona 85701

**Re: Tailings Dam Dust Control Management Plan Revision, Freeport-McMoRan Sierrita Inc., Permit # 6067**

Dear Mr. Fitzpatrick:

Attachment B, Section XIX. B.3.b.ii. of the Freeport-McMoRan Sierrita Inc. (FMSI) Air Quality Control Permit No.6067 requires that FMSI maintain a Tailings Dam Dust Control Management Plan (TDDCMP). Sierrita has maintained an approved TDDCMP since issuance of its Title V Permit. The permit also requires FMSI to provide notification to the Control Officer within 10 days following a change to the TDDCMP. In addition, FMSI committed to a revision of the current TDDCMP in the response letter to Notice of Violation PC 1810-033, dated December 28, 2018 and PC 1811-151, dated January 30, 2019.

Attached to this letter, please find the revised Tailings Dam Dust Control Management Plan, dated March 25, 2019.

If you have any additional questions or require additional information, please contact me at (520) 393-2376.

Sincerely,

A handwritten signature in black ink that reads 'Natalie Nunez'.

Natalie Nunez  
Senior Environmental Scientist

20190325\_001  
1 attachment

Certification of Truth, Accuracy and Completeness

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

David Rhoades, General Manager – Sierrita Operations



(Signature)



(Date)

# **Freeport-McMoRan Sierrita, Inc.**

## **Tailings Dam Dust Control Management Plan**

### **1.0 Introduction**

#### **1.1 Vision and Mission Statement**

##### **VISION**

A stable, dust-free, visually attractive tailings dam.

##### **MISSION**

Through teamwork, good communication, training, and technological improvements, we are leaders in tailings dam safety and environmental stewardship. Employees are empowered to construct Sierrita's dam in a manner that is structurally sound, weather resistant and blends into the natural landscape.

#### **1.2 Permit Requirements and Policy**

As company policy Freeport-McMoRan Sierrita, Inc. (FMSI) shall, to the extent practicable, maintain the surface crust of the tailings dam by using water, magnesium chloride ( $MgCl_2$ ), or other approved methods along with taking other reasonable precautions, to prevent excessive amounts of particulate matter from becoming airborne and to meet or exceed compliance with the opacity and visibility limiting standards of the Air Quality Permit. FMSI shall accomplish these goals via the methods, equipment and procedures outlined in this Tailings Dam Dust Control Management Plan (TDDCMP). FMSI shall operate as an environmentally responsible producer of quality mineral products and Sierrita's Tailings Dam operations shall be designed and operated in a safe, and environmentally responsible manner.

The Freeport-McMoRan Sierrita, Inc. (FMSI) Air Quality Class I Permit requires that reasonable precautions be employed to prevent excessive amounts of particulate matter from becoming airborne. Airborne particulate from the tailings dam is also limited to no greater than 20% opacity measured in accordance with EPA Reference Method 9. In addition, FMSI 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, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter. The actions constituting reasonably necessary and feasible precautions are included as conditions of the Title V Permit.

#### **1.3 Background**

The FMSI milling facility, commonly known as the concentrator, is designed to economically produce marketable copper and molybdenum concentrates. The valuable minerals are liberated from the ore by first crushing and grinding the ore. The free minerals are then collected into enriched concentrates by flotation. For each ton of ore FMSI processes, approximately five pounds of copper and a half pound of molybdenum are

recovered in about twenty pounds of enriched material. The remaining 1,980 pounds of ground rock material is referred to as tailings.

Tailings slurry gravity flows from the concentrator at about 25,000 gallons per minute and is about 50% percent solids by weight. This mixture is gravity fed through a 42-inch pipeline to a pump station located on the inactive Esperanza Tailings Impoundment. From there, the slurry is pumped to the surface of the Sierrita Tailings Impoundment. The tailings distribution pipeline system around the top of the impoundment is approximately 12.5 miles in length. The tailings dam itself covers an area of about 3,200 active acres. It is approximately 5 miles southeast of the concentrator and is divided into two areas referred to as the North and South dam.

The North and South dam are each divided into three phases for a total of six phases. Refer to Attachment A for the general configuration of the tailings dam. Typically, five phases are utilized for tailings deposition while the remaining phase goes through a construction period. During this period, the surface is allowed to dry to the point that it is safe for equipment to operate on it. The tailings deposition sequence can be altered due to operational necessities such as berm push, pipe lift, corrective maintenance, etc.

## **2.0 Control Plan – Normal Operations**

### **2.1 Operating Strategy and Inspections**

FMSI's strategy is to ensure that fugitive dust emissions from the tailings impoundment surface and related areas are controlled by using reasonable precautions at all times. As described in this Plan, reasonable precautions authorized for use by FMSI's Class I air quality permit consist of the following:

- (1) Use of "wet" dam construction method.
- (2) Berm construction techniques to minimize dust emissions.
- (3) Suitable products for stabilization of the side slopes.
- (4) Encrustation of the surface of the impoundment.
- (5) New tailings dam roads, constructed as part of pipeline lift (discussed below), are capped with native dirt and treated with a dust suppressant.
- (6) Heavily traveled perimeter roads will be treated with dust suppressant (e.g.  $MgCl_2$ ).
- (7) Revegetation techniques used for side slope stabilization, where practical.
- (8) Active berms and construction areas shall be sprayed with water or other dust suppressant, as necessary.
- (9) After heavy rainfall events (sufficient to cause surface runoff and flushing of natural dust suppressing surface salts) if the upper most layer becomes susceptible to wind erosion, a dust suppressant will be reapplied, as practicable and necessary, to the impoundment surface area requiring additional control.

Daily visual inspections of the tailings dam shall be conducted to observe the dam surface characteristics and conditions. The inspection shall identify signs of fatigue on the surface crust and areas on the surface of the impoundment that have been impacted by storm events (i.e. hot spots). The results of this inspection shall be used to determine the need for additional dust control measures. Corrective and/or preventive actions taken in response to the results of this inspection shall be recorded. A copy of this form is provided in Attachment C.

## **2.2 Roads and Embankment Faces**

A suite of dust control measures shall be utilized to minimize fugitive emissions from the tailings dam roads and embankment faces. New tailings dam roads, constructed as part of each pipeline lift, shall be capped with native soil and treated with a dust suppressant as soon as practicable. The soil cap is less susceptible to erosion and will hold more moisture when water is applied. Application of the dust suppressant to the native soil cap establishes a more solid roadway which creates less dust with vehicle traffic. Perimeter roads shall be treated with dust suppressant, as necessary, to minimize dust from vehicular traffic and high velocity winds. Once roads have been treated with a dust suppressant, water is applied as needed.

Dust suppressants and water are used on the sloped embankments of the dam faces (side slopes) and on portions of the Esperanza tailings area. A dust suppressant shall be used on the side slopes to minimize dust from these areas due to high velocity winds. The dust suppressant shall be used as needed, and reapplied as is determined necessary through a daily visual inspection. Water trucks shall be used, as necessary, to spray the active berms and construction areas to minimize fugitive dust.

## **2.3 Tailings Deposition – Dam Filling Operations**

When berm construction activities are not in progress, the dam is normally kept wet by continual rotation of operating spigots and switching between North and South Dam pipelines. This tailings deposition sequence can be altered due to operational necessities such as berm push, pipe lift, corrective maintenance, etc. Dam building (i.e. adding fresh tailings to the active portion of the impoundment) is accomplished by opening multiple six-inch spigot pipes that are attached to the 42-inch tailings pipeline to deposit tailings slurry into the interior of the tailings dam.

As evaporation occurs on the tailings surface, the concentration of gypsum and sodium sulfate salts in the interstitial water is increased. These salts assist in the binding of the surface of the tailings and help prevent wind erosion.

## **2.4 Berm Construction**

Prior to berm construction, the dam will go through a final fill with deposition. The dam will be filled until deposited solids are approximately two feet from the crest. Typically, the fill will start on the west end of the respective dam phase that is being filled and work

its way to the divider. Once the first phase is filled, it will go into a rest period generally lasting several weeks.

When proper moisture conditions for berm construction are achieved through evaporation, the dam will be prepped for berm construction. Through the use of low ground pressure dozers, the first sections are ripped to a depth of up to 4 to 6 feet, which will encourage surface evaporation and homogenize the material. Once the tailings material reaches a workable moisture content, the berm lift will commence with the dozers pushing the tailings material on top of the previous berm, creating the desired height of the new berm. This can vary in height, but the overall tailings impoundment will always be built at a 3 to 1 slope or less for stability purposes.

During the construction period, water trucks are utilized to control fugitive dust. During the ripping stage and the berm lift, water trucks will add water to disturbed areas. A water truck will be designated to support the ongoing construction throughout the entire process.

The decision to use all-tracks will be made when areas do not have the potential for immediate deposition in completed construction areas. The all-tracks will apply  $MgCl_2$  throughout the process in areas that become dry or areas where the salt crust has deteriorated. They will also be utilized in areas where water trucks do not have access due to soft ground conditions and in borrow pits during berm construction, as necessary.  $MgCl_2$  will also be applied to hot spots that may develop in areas between berm construction and the interior reclaim pond.

As construction proceeds, sections of the newly completed dam will be available to deposit tailings. This process allows for additional dust control measures by freeing up equipment to concentrate on areas near the berm construction or ahead of the build.

## **2.5 Berm Construction – Pipeline Lift**

Every 40 vertical feet, approximately five years, the 42-inch pipeline around the perimeter of each side of the dam is raised to a higher working elevation to maintain a safe and practical operating pressure for the spigots. The pipeline is raised to the highest elevation of the completed dam and new roadways are established at this height. Pipe lift construction generally takes approximately 12 months.

Phase I of the dam is filled in preparation for construction of a new berm, road and pipe bed. After final filling, 4 to 8 weeks of evaporating time is required to allow low-ground pressure bulldozers to work in the area and provide proper moisture content for adequate compaction of the erected berm, road, and pipe bed. The length of time required to achieve proper moisture content varies depending on weather conditions after final fill. Inspections of the surface are conducted regularly to ensure there are no areas that could potentially create dust. Refer to section 4.1 for more information.

During the pipe lift construction, water trucks shall be used as needed to control fugitive dust on roads and berms in the tailings impacted areas. As the roadway progresses, a top layer of native soil is applied as a dust control measure. The all-track vehicles will be

utilized to control interior dust during the pipe lift construction period if surface conditions on the interior of the dam are stable enough for travel. The  $MgCl_2$  is used throughout the construction phases on the interior of the dam and on pipeline road.

## **2.6 Surface Application of Dust Suppressant**

Daily inspections of the tailings dam shall be made to observe the dam surface characteristics and conditions. The inspection shall identify signs of fatigue on the surface crust and areas on the surface of the impoundment that are susceptible to storm events (i.e. hot spots). The results of this inspection will be used to determine the need for additional dust control measures.

If slurry deposition of the area is not practical, all-track vehicles will be utilized to apply  $MgCl_2$  where feasible.  $MgCl_2$  storage containers are staged in close proximity to or on the tailings impoundment so that it is readily available for use. FMSI will record locations where dust suppressant is applied on the surface inspection sheet along with where tailings slurry is being deposited.

In some instances, excessive moisture on the tailings impoundment creates an unsafe condition where the all-track vehicles may become stuck in the tailings material, entrapping the employee. To address hot spots where these conditions exist, FMSI has developed and will maintain the ability to apply dust suppressant manually, if safe conditions allow. Manual application consists of stand-alone pumps mounted on the all-track vehicle with attached hoses. Instead of the  $MgCl_2$  being sprayed from the all-track, a person walks with a hose to areas too soft for the all-track to travel. This allows areas to be covered that are inaccessible by equipment.

In addition, FMSI has implemented GPS units on the all-track vehicles to track  $MgCl_2$  application on the tailings impoundment. This allows for more precise tracking of dust suppressant application and hot spot prevention.

## **2.7 High Wind and Heavy Rainfall Events**

FMSI will always pay close attention to the local weather forecast for the area on a daily basis. If the local weather forecast indicates high winds (approximately 15mph or greater) in the area, FMSI will evaluate the tailings impoundment to determine if the surface is prepared for forecasted weather and appropriate adjustments will be made as follows:

- Schedule change to apply more dust suppressant chemicals or run water trucks. This includes the possibility of 24 hour coverage on dust control equipment and utilizing additional workforce from other departments.
- Daily job tasks will be changed to focus on dust control. This includes deferring earth work projects and other non-dust control related tasks.
- Focus daily inspections on areas of concern

After a heavy rainfall or high wind event, FMSI will evaluate the areas where the storm may have affected the dam. Heavy rainfall events are those sufficient to cause surface runoff and flushing of natural dust suppressing surface salts. If damage is observed, contingency measures will be implemented, as described in section 3.0.

FMSI has three weather stations in close proximity to the tailings impoundment to monitor wind speed and direction. The weather stations are calibrated annually by a third party consultant. FMSI believes these weather stations are the most accurate and representative data for the tailings impoundment and will use this data for reporting purposes.

### **3.0 Contingency Measures**

FMSI is dedicated to using all reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne from the tailings impoundment, associated berms, and roadways. Despite these efforts, environmental conditions may occur that overwhelm these reasonable precautions. If so, FMSI will implement contingency measures that go beyond those considered reasonable to control dust. Contingency measures include::

- Additional evaluation of areas where the storm has affected the dam, if damage has been observed, FMSI will take appropriate actions to mitigate the affected areas which may include:
  - All-track vehicles applying  $MgCl_2$  to areas that are accessible to help re-establish a crust, which can include adding additional shifts up to 24-hour coverage..
  - If areas are not accessible for travel of all-track vehicles, manual application may be used to cover the area(s) of concern.
- Additional resources will be used in areas around the impoundment such as the outer berm and roads which will be sprayed with water using water trucks, as needed.
- Once area(s) of concern have been addressed, FMSI will continue normal daily inspections.

## **4.0 Monitoring and Communication Procedures**

### **4.1 Inspections and Recordkeeping**

As described in Section 2.1, regular visual inspections of the tailings dam shall be made to observe the dam surface. The inspection shall identify signs of fatigue on the surface crust and areas of the impoundment that may be susceptible to storm events (i.e. hot spots). The results of this inspection will be used to determine the need for additional dust control measures. Corrective and/or preventive actions taken in response to the results of this inspection shall be recorded. A copy of this form is provided in Attachment C.

A certified Method 9 observer from the Environment, Land and Water Department will complete a weekly visual survey of the tailings impoundment. If the observer sees visible emissions that on an instantaneous basis appear to exceed the opacity standard, then the

observer shall, if practicable, take a six-minute Method 9 observation of the plume. A copy of a Visual Emission Observation (VEO) form is attached (Attachment B).

In accordance with the FMSI Air Quality Permit, a Tailings Dam Weekly Environmental Activities Report shall be compiled weekly with records of the following:

- The area of tailings deposition and any special wetting areas such as project areas
- The number of loads of water that has been applied to tailings impoundment area during the previous week.
- The amount and areas of chemical dust suppressant application to the roads, berms and surface of the tailings impoundment during the previous week.
- Site conditions, such as, areas of construction and inches of rain during the previous week.

A copy of the Tailings Dam Weekly Environmental Activities Report is included in Attachment A.

FMSI has implemented a pilot program to augment dam inspections by using a drone with a mounted camera.. These drone flights are performed periodically while the pilot program continues to be evaluated for effectiveness of hot spot identification.

#### **4.2 Evaluation of Objectives**

On a semi-annual basis, an internal review team comprised of FMSI Environmental personnel, shall conduct an audit of the tailings dam. The audit will evaluate the effectiveness of the TDDCMP by conducting an inspection of the tailings dam, reviewing pertinent records including the Tailings Dam Weekly Environmental Activities Reports, VEOs, and VEO training certifications. The audit will include recommendations for improving dust management at the Tailings Impoundment based on measures specified in the FMSI Air Quality Permit. All improvements or corrective actions shall be reviewed, developed and implemented. A checklist audit form is used to document the results of the audit, refer to Attachment D.

#### **5.0 Potential Dust Control Improvement Experiments and Projects under Review**

The dust control procedures at the FMSI tailings dam are continually improving and new technologies have been utilized during the past several years to prevent excessive amounts of particulate matter from becoming airborne. FMSI continues to evaluate binders, dust suppressants, construction and reclamation techniques that provide a safe, economical and environmentally compliant means of managing the tailings dam facility. Dust control improvement experiments and projects with their results are provided below.

##### **Experiments:**

Year	Experiment	Results
2018	Solicit bids to companies who specialize	FMSI conducted a Dust Suppressant

	<p>in dust control suppressants for tailings dams to determine if there is a better product that will help control fugitive dust and be sufficient enough for future mining activities (i.e. leaching of tailings deposits)</p>	<p>study from mid-2018 to first quarter of 2019. The final results are being compiled at the time of this revision of the TDDCMP.</p>
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**Projects:**

Year	Project	Results
2018	Adding a color pigment to the MgCl <sub>2</sub> to better track application in all areas across the tailings dam.	Trials to be conducted in 2 <sup>nd</sup> and 3 <sup>rd</sup> quarter of 2019.
2019	Replace the steel tank with a poly tank on the Terramac to reduce the weight of the equipment to allow better accessibility to the water's edge.	Tank is on-site and is scheduled for installation in 2 <sup>nd</sup> quarter of 2019.

# Attachment A

## Tailings Dam Weekly Environmental Activities Report

### Tailings Dam Environmental Weekly Activities Report

Operator: \_\_\_\_\_ Date: \_\_\_\_\_

Primary Controls	N/S	Phase	Area			
Area of Deposition						
Special Wetting Area						
Water Truck #	88	94	36	37	Rental	Rental
No. of Loads						

	Gallons	N/S	Approximate Area Covered
All-track Application			
Mag. Chloride Applied to Rds			
Site Conditions			
Area Under Construction			
Inches of Rain Throughout Week			

Comments: \_\_\_\_\_

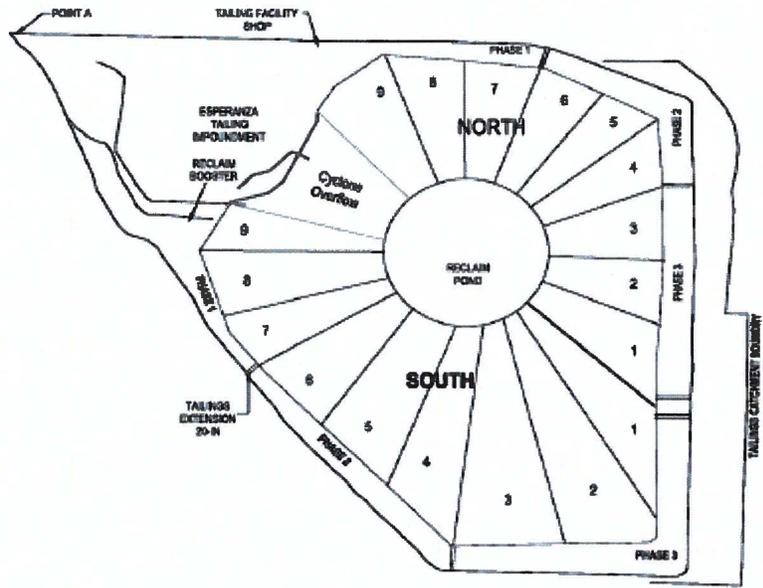
\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



## Attachment B

### Visible Emission Observation (VEO) Form

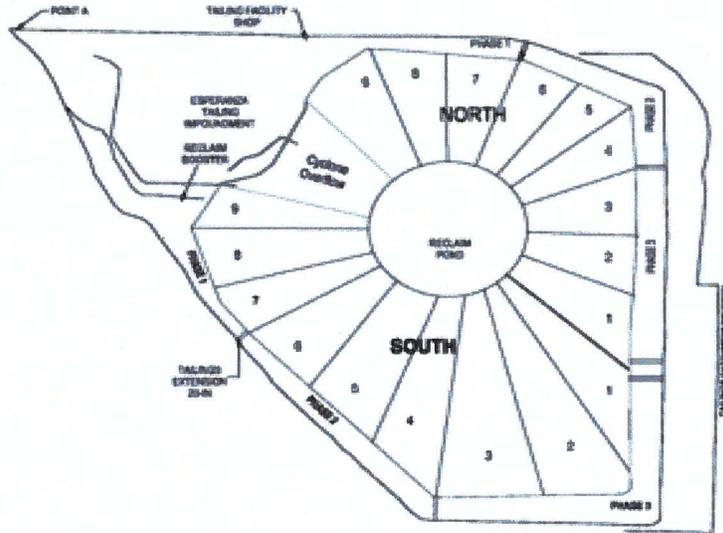
<b>FREEPORT-McMoRAN COPPER &amp; GOLD</b>		6200 W. Duval Mine Road P. O. Box 527 Green Valley AZ 85622-0527 Tel: (520) 648-8500		Observation Date		Start Time		Stop Time	
				Min	Sec	0	15	30	45
<b>Sierrita Operations</b>				1					
				2					
PROCESS EQUIPMENT		OPERATING MODE		3					
				4					
CONTROL EQUIPMENT		OPERATING MODE		5					
				6					
DESCRIBE EMISSION POINT				7					
				8					
HEIGHT ABOVE GROUND LEVEL		HEIGHT RELATIVE TO OBSERVER		9					
				10					
DISTANCE FROM OBSERVER		DIRECTION FROM OBSERVER		11					
				12					
DESCRIBE EMISSIONS				13					
START		STOP		14					
EMISSION COLOR		PLUME TYPE: CONTINUOUS <input type="checkbox"/>		15					
		FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>		16					
WATER DROPLETS PRESENT:		IF WATER DROPLETS PLUME:		17					
NO <input type="checkbox"/> YES <input type="checkbox"/>		ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		18					
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED				19					
				20					
DESCRIBE BACKGROUND				21					
START		STOP		22					
BACKGROUND COLOR		SKY CONDITIONS		23					
START STOP		START STOP		24					
WIND SPEED		WIND DIRECTION		25					
				26					
AMBIENT TEMPERATURE		WET BULB TEMP.		27					
		RH, (%)		28					
Source Layout Sketch				29					
<i>Draw North Arrow</i>				30					
		OBSERVERS NAME (PRINT)							
		OBSERVERS SIGNATURE				DATE			
		ORGANIZATION				DATE			
		CERTIFIED BY				DATE			
ADDITIONAL INFORMATION									

# Attachment C

## Tailings Impoundment Surface Inspection Form

### Tailings Impoundment Surface Inspection

Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Dam Inspected: \_\_\_\_\_ Inspected By: \_\_\_\_\_



1	Recent Deposition (14 days or less)	No Action Required
2	Moist Surface	No Action Required
3	Established Salt Crust	No Action Required
4	Crusted with light surface sands (blown in/washed in)	Watch Area/Re-inspect in one week
5	Crust is breaking down	Watch Area/Re-inspect in one week
6	Piles of standing sands	Action Required - Deposition or application of suppressant
7	Broken down crust	
8	Area has had dust suppressant recently applied	Watch Area/Re-inspect in one week

All-Track	Availability		Running		Location	Loads	Tot Gal.	H2O Trucks	Availability		Running	Loads
70105 (750g)	Yes	No	Yes	No				73736 (10000g)	Yes	No	Yes	No
70106 (750g)	Yes	No	Yes	No				73737 (8000g)	Yes	No	Yes	No
70107 (750g)	Yes	No	Yes	No				74188 (5000g)	Yes	No	Yes	No
70108 (750g)	Yes	No	Yes	No				74194 (5000g)	Yes	No	Yes	No
70109 (1500g)	Yes	No	Yes	No				Rental				
								Rental				

Inspection Action Plan: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Attachment D**  
**Semi-Annual Tailings Dam Review Dust Control Management Plan**

**Semi-Annual Tailings Dam and Dust Control Management Review**

Date of Audit: \_\_\_\_\_

Review Team Members: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**Visual Inspection**

Yes  No  Are berm construction activities currently in progress?

Yes  No  Is there any evidence of fugitive emissions in excess of permit conditions?

Yes  No  Is a dust suppressant (i.e. water, MgCl<sub>2</sub>) being applied on a frequent basis?

Comments:

\_\_\_\_\_  
\_\_\_\_\_

**Records Review**

Yes  No  Have Tailings Dam Weekly Environmental Activities Reports been completed at least weekly for the last six months and are they completed accurately?

Comments:

\_\_\_\_\_  
\_\_\_\_\_

Yes  No  Have Visible Emissions Observations (VEO) been conducted at a minimum on a monthly basis for the previous six months?

Yes  No  Were the VEO(s) conducted by a certified Method 9 observer?

Yes  No  Have any high opacity events resulted in the previous six months?

Yes  No  Is the MgCl<sub>2</sub> Log and Water truck log filled out properly?

Yes  No  Does the MgCl<sub>2</sub> log line up with the weekly report?

Comments:

\_\_\_\_\_  
\_\_\_\_\_

List high opacity dates and corresponding weather and operating conditions, if applicable, within the last 6 months:

\_\_\_\_\_  
\_\_\_\_\_

Yes  No  Were all corrective actions completed for high opacity events for the past six months?

Comments:

\_\_\_\_\_  
\_\_\_\_\_

**Reasonable Precautions:**

The Sierrita Title V air permit states that recommendation for improving dust management are "based on the results of a semi-annual checklist audit of compliance with the measures specified in XIX.B.1." The checklist consists of the reasonable precautions identified in Section XIX.B.1

Reasonable Precautions (Section XIX.B.1)

Yes  No  Are new tailing dam roads capped with native dirt?

Yes  No  Are heavily traveled perimeter roads capped with dust suppressant, as necessary?

Yes  No  Are active berms and construction areas sprayed with water, as necessary?  
Yes  No  Is dust suppressant applied to surface areas susceptible to wind erosion?

Comments:

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**Recommendations:**

Date of last plan revision: \_\_\_\_\_

Yes  No  Are all procedures being followed according to the plan?

Yes  No  Are there any procedures that are no longer in use? If so, state here and revise plan.

Yes  No  Are there any new experiments/projects? Have there been updates to existing projects?

Explain any recommended updates/revisions to the plan.

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