



June 3, 2008

Mr. Joseph A. Brunner  
Resource Reclamation Manager  
Freeport McMoRan Copper & Gold  
Resource Management  
One North Central Avenue  
Phoenix, AZ 85004-2306

Re: Ready for Reuse Determination  
Amax Metals Recovery, Inc. (AMRI) Port Nickel Facility  
AI No. 16817  
3607 English Turn Road  
Braithwaite, Plaquemines Parish, Louisiana

Dear Mr. Brunner:

The Louisiana Department of Environmental Quality (LDEQ) and United States Environmental Protection Agency (EPA), Region 6 together have determined that a portion of the Amax Metals Recovery, Inc. (AMRI) Port Nickel Facility (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgment by both agencies that environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use.

The Property encompassed by this Ready for Reuse Determination consists of approximately 410 acres of the former Port Nickel Facility used from 1958 until operations ceased in 2000. The current owner is Amax Metals Recovery, Inc., which is a wholly owned subsidiary of Freeport-McMoRan Copper & Gold, Inc. The Property is located in Braithwaite, Louisiana (Plaquemines Parish), on the east bank of the Mississippi River approximately 15 miles south of New Orleans.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that Amax Metals Recovery, Inc. has successfully conducted investigation and risk management activities and the environmental conditions at the Property are protective of human health and the environment based on its current and planned future commercial/industrial and ecological uses. The Ready for Reuse Basis of Decision is provided as Enclosures 1 and 2 to this correspondence. Information concerning the current environmental conditions of the site and risk management activities to ensure protectiveness is summarized in Enclosures 3 and 4. Copies of relevant documents may be obtained from LDEQ at the addresses provided in Enclosure 5 to this correspondence.

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If conditions on the property change, including environmental conditions, land use, site receptors, and remedy performance, the current owner/operator will notify LDEQ and it may become necessary to perform additional investigation and/or remediation to ensure continuing protectiveness. The undersigned expressly reserve all rights and authorities to require future action by owners or operators if new or additional information becomes apparent that impacts this Ready for Reuse Determination, whether such information is known as of this date, or is discovered in the future.

Congratulations on this most noteworthy achievement!

Sincerely yours,



Harold Leggett, Ph.D.  
Secretary  
Louisiana Department of  
Environmental Quality



Carl E. Edlund, P.E.  
Director  
Multimedia Planning  
and Permitting Division  
EPA Region 6

Enclosures

## ENCLOSURE 1

### READY FOR REUSE BASIS OF DECISION AMAX METALS RECOVERY INC. PORT NICKEL FACILITY

#### INTRODUCTION

The Louisiana Department of Environmental Quality (LDEQ) – Remediation Services Division (RSD) has determined that the Amax Metals Recovery, Inc. (AMRI) Port Nickel Facility (the “Property”) (LDEQ Agency Interest 16817) is Ready for Reuse. The Property meets the criteria for a Ready for Reuse Determination because it has been investigated and remediated to the extent necessary such that environmental conditions on the Property are protective of human health and the environment based upon its current and/or planned land use. Information regarding the Property’s background, the results of investigations and remedial activities, and current conditions at the Property are summarized in the following sections.

#### PROPERTY DESCRIPTION

The Amax Metals Recovery Inc. (AMRI) Port Nickel Facility (Facility) is located in Braithwaite, Plaquemines Parish, Louisiana. The Facility comprises approximately 1,100 acres on the east bank of the Mississippi River, approximately 15 miles south of New Orleans, Louisiana. The geographical coordinates of the Port Nickel Facility are 29° 51’ 40” N and 89° 57’ 55” W. The Property consists of an approximately 410 acre portion of the Port Nickel Facility, as defined in the legal description and conveyance notification map provided in Enclosure 2.

The Ready for Reuse Property includes the following areas:

- (1) All of the Voluntary Remediation Program (VRP) Area addressed by LDEQ’s November 15, 2007 Voluntary Remediation Program Certificate of Completion/No Further Action (23 Solid Waste Management Units (SWMUs) and two Areas of Investigation (AOIs));
- (2) SWMU 10 (part), Oxidation Pond;
- (3) SWMU 10 (part), Process Water Pond;
- (4) SWMU 12, Landfills A and A1;
- (5) Dock Structures; and
- (6) SWMU 18, NPDES Storm Water Drainage Ditches.

The following areas of the Port Nickel Facility are not included in this Ready for Reuse Determination. AMRI’s legal description provided in Enclosure 2 specifically excludes this unit from the Property.

- (1) SWMU 8, Reclamation Process Pond (Tract 2 of Legal Description, Enclosure 2);
- (2) SWMU 10 (part), Wastewater Pond (Tract 1 of Legal Description, Enclosure 2); and
- (3) SWMU 10 (part), Wastewater Storage Pond (Tract 1 of Legal Description, Enclosure 2).

Information regarding these areas is provided below and in Enclosures 3 and 4.

## **BACKGROUND INFORMATION**

The Port Nickel Facility was established in 1957-1958 by the Cuban-American Nickel Company, a Freeport Sulfur (Freeport) subsidiary, to process metal sulfide concentrates derived from the Moa Bay (Cuba) Laterite Project and produce pure forms of nickel and cobalt. The Facility's original operation was closed in 1959 as a consequence of the Cuban Revolution. In 1972, AMAX Inc. (AMAX) purchased the plant from Freeport to produce metallic nickel, cobalt, and copper. The original operations were expanded to refine very pure forms of these metals from nickel, cobalt, and copper mattes (pre-processed sulfide concentrates) supplied from Africa and Australia. The nickel refining process operated from 1974 to 1985 when it closed again as a result of a depressed nickel market and the loss of the matte supply from Africa.

In 1985, AMAX modified the Facility to use spent catalysts from petroleum refining operations as its principal feed stock. As a result of a partnership between AMAX and Shell Oil Company, the Facility's name was changed to Amax Metals Recovery, Inc. (AMRI). The previously converted hydrometallurgical manufacturing operations were used to produce finished products of aluminum, nickel, molybdenum, and other metals from 1986 to 2000. The Facility also processed a small amount of secondary materials containing chromium and aluminum. Prior to ceasing operations in 2000, the Facility was operated by Cyprus Amax Minerals Company, which was acquired by Phelps Dodge Corporation in 1999. In March, 2007, Freeport-McMoRan Copper & Gold Inc. (Freeport-McMoRan) acquired Phelps Dodge Corporation. The current owner continues to be AMRI, which is a wholly owned subsidiary of Freeport-McMoRan.

## **PROPERTY INVESTIGATION AND REMEDIAL ACTION CHRONOLOGY**

The following sections provide information regarding the investigation and remedial action taken at the units included in this Determination. The Ready for Reuse Property comprises 410 acres. Of these, approximately 215 acres were included in the Voluntary Remediation Program Area, and 195 acres make up the other areas combined.

### **(1) Voluntary Remediation Program Area**

The 23 Solid Waste Management Units and two Areas of Investigation addressed by LDEQ's November 15, 2007 Voluntary Remediation Program Certificate of Completion/No Further Action are listed in Enclosure 3. Further information may be reviewed in the November 15, 2007 Certificate of Completion/No Further Action prepared by LDEQ [LDEQ Electronic Data Management System (EDMS) Document 36434447].

### **(2) SWMU 10 (part), Oxidation Pond**

The three-acre Oxidation Pond functioned as AMRI's sanitary treatment system from 1958 until its closure in 2007 by providing biological treatment of the sewage sludges generated at the Port Nickel Facility. This unlined impoundment was excavated from underlying native clays with berms constructed from excavated material. The pond was

constructed with the approval of the Louisiana Department of Health and did not need a permit.

Closure involved the dewatering of the pond followed by in-place stabilization of residual sludges. Following stabilization, sampling and analysis of the in-place stabilized sludges were conducted to determine if closure of the unit in-place met criteria under LAC 33:IX.6901 for the land application of sewage sludges. Samples were characterized for Facility Constituents of Concern and evaluated for the Exceptional Quality Level for fecal coliform, PCBs and specific oxygen uptake rate, as defined in LAC 33:IX.6901. Upon approval of AMRI's closure confirmation report by LDEQ (EDMS Documents 35904376 and 36016695 respectively), the pond was closed in-place under MO-1 RECAP standards with no remedial action required.

(3) SWMU 10 (part), Process Water Pond

The Process Water Pond, also known as the Raw Water Pond or Firewater Pond, provided storage capacity for reserve process water received from the Mississippi River that was required to support AMRI's manufacturing operations. The unit was constructed to a maximum depth of six feet below ground surface and the excavated soils were used to construct a containment berm to separate the unit from adjacent impoundments.

Following completion of the investigation and approval of AMRI's closure confirmation report by LDEQ (EDMS Documents 35904374 and 35938059 respectively), the pond was closed in-place in accordance with applicable RECAP screening standards. Based on the its original location and site elevation, AMRI elected to restore the closed pond and contiguous down-gradient areas of the Port Nickel Facility to a wildlife habitat. Upon closure of the adjacent Wastewater Storage Pond and Oxidation Pond (both part of SWMU 10), the containment berm was lowered and a spillway was constructed at the down-gradient end of the unit to lower the water level and restore the pond and contiguous down-gradient areas to a wildlife habitat.

(4) SWMU 12, Landfills A and A1

This SWMU consists of two inactive Solid Waste landfills, located north of the Process Water Pond. Both landfills are underlain by native clays. Landfill A has been inactive since 1973. The landfill was excavated and backfilled with clean soil in 1993 as part of AMRI's closure of the Process Reclamation Pond (SWMU 08). Approximately 7,000 cubic yards of industrial debris, solid waste, and contaminated soils were removed and placed within the Reclamation Process Pond closure cell prior to capping activities.

Landfill A1, with an estimated surface area of 1.5 acres and an approximate capacity of 4,000 cubic yards, has been inactive since 1979. The contents of Landfill A1 were believed to consist of industrial debris and solid waste resulting from nickel refining operations. Following a three-phase investigation process completed in 2005 in accordance with applicable RECAP industrial MO-1 standards, the landfill was closed and no remedial action was required.

(5) Dock Structures

The Port Nickel Facility's docks consist of two separate dock structures located on the Mississippi River. These docks were used to off-load and on-load commodity feed materials and commercial products, and were not regulated units. The dock structures were closed during AMRI's closure of the Port Nickel Facility's feedstock materials storage areas during which a site-specific confirmation testing procedure was developed to verify clean closure of surfaces and above-ground structures. AMRI completed closure of the surfaces associated with the dock structures in 2001, and submitted a closure report to the LDEQ on March 01, 2001 (EDMS Document 17323984).

(6) SWMU 18, NPDES Storm Water Drainage Ditches

SWMU 18 consists of two unlined storm water conveyance systems (i.e., North and South Storm Water Ditches, LPDES Outfalls 002 and 003, respectively) excavated from natural clays. The system remains active and is maintained under an alternative regulatory program (LPDES Permit LA0045233). The areas of the unit located east of La. Hwy. 39 were addressed by the LDEQ's Voluntary Remediation Program Certificate of Completion/No Further Action. Investigation activities conducted in direct proximity or contiguous to the unit, demonstrated that subsurface soils and water complied with appropriate RECAP screening limits. The LDEQ's VRP determination confirmed that the Port Nickel Facility's Process Area Containment (PAC) system isolated the unit from potential releases resulting from historic manufacturing operations.

The area of the unit west of La. Hwy. 39, which is down gradient from the area of the unit resolved under the LDEQ's VRP, was addressed under two separate voluntary remedial actions conducted in 1979 and 1993, and by remaining under the conditions of an alternative regulatory program. In 1979, a release occurred from the process transfer line the area of the South Storm Water Ditch, adjacent to the Reclamation Process Pond (SWMU 8). The impacted portion of South Storm Water Ditch (i.e., approximately 1,500 feet, running east of La. Hwy. 39) was isolated from the release and blocked to prevent flow to the Forty Arpent Canal, and purged of the released solution. Following the removal of tailings material resulting from the release, the areas adjacent to the South Storm Water Ditch and Reclamation Process Pond (SWMU 8) that were impacted by the release were treated with lime and covered with sand.

In 1993, AMRI conducted a voluntary remedial action (i.e., soil excavation) to address areas directly adjacent to the Reclamation Process Pond, including the previously addressed 1,500 foot section of the South Storm Water Ditch. During the remedial action, AMRI excavated approximately 12,000 cubic yards of soils from the South Storm Water Ditch and areas adjacent to the Reclamation Process Pond. Excavated soils were consolidated within the in-place closure of the Reclamation Process Pond. Groundwater monitoring, required as a condition of the Reclamation Process Pond's post-closure requirements under LDEQ Solid Waste Permit P-0135, has documented no contaminants.

On April 27, 2006, the LDEQ approved a minor modification to the unit's permit, allowing the diversion of storm water, previously managed by the Port Nickel Facility's

wastewater treatment system, to flow to Outfalls 002 and 003. The diversion was required prior to closure activities being initiated on the remaining surface impoundments associated with the Port Nickel Facility's wastewater treatment system.

## **INVESTIGATION AND REMEDIAL ACTION CHRONOLOGY OF AREAS NOT INCLUDED IN THE PROPERTY**

The following areas of the Port Nickel Facility are excluded from AMRI's Ready for Reuse Determination request. These units were closed in-place and are currently being maintained under an alternative regulatory program (LDEQ Solid Waste Permit P-0135). The closure of the two areas included in SWMU 10 under the Solid Waste regulation was confirmed by LDEQ on October 8, 2007.

- (1) SWMU 8, Reclamation Process Pond;
- (2) SWMU 10 (part), Wastewater Pond; and
- (3) SWMU 10 (part), Wastewater Storage Pond.

Further information regarding these areas is provided in Enclosures 3 and 4.

## **PROPERTY INSTITUTIONAL CONTROLS AND CURRENT ENVIRONMENTAL CONDITIONS**

The use of the areas included in this Ready for Reuse Determination is limited to industrial/commercial or ecological use. A conveyance notification including this property has been filed with the Clerk of Court in Plaquemines Parish by Amax Metals Recovery, Inc.

The current status of those Ready for Reuse SWMUs or AOIs with contaminant concentrations that exceeded the RECAP Screening Standards is summarized in Enclosure 4 (Current Property-Wide Environmental Conditions) to this Ready for Reuse Determination letter. Contact information for questions regarding these conditions is provided in Enclosure 5.

## **REFERENCES**

Documents related to the site investigations and remedial actions at the Amax Metals Recovery, Inc. Port Nickel Facility are public records, and are available through LDEQ's Electronic Document Management System (EDMS). Contact information for obtaining access to these records is provided in Enclosure 5 to the Ready for Reuse Determination letter. A list of primary documents that support this Ready for Reuse Determination Basis of Decision is provided below. Additional documents regarding this facility may be reviewed under Agency Interest Number 16817.

*Facility-Wide Summary Report*, AMRI Correspondence and Documentation, June 27, 2007 [EDMS Document 36119977]

*Voluntary Remediation Application Form*, AMRI VRP Application Submittal, August 13, 2007  
[EDMS Document 36187044]

*Certificate of Completion / No Further Action*, LDEQ Correspondence and Basis of Decision,  
November 15, 2007 [EDMS Document 36434447]

*Ready for Reuse Determination Request*, AMRI Correspondence and Documentation, May 13,  
2008



## ENCLOSURE 2

### LEGAL DESCRIPTION AND MAP OF READY FOR REUSE PROPERTY

The Ready for Reuse Property consists of an approximate 410 acre portion of the Port Nickel facility, as defined in the following legal description and illustrated in the attached conveyance notification map.

Commencing at a point on the west Right of Way line of La. State Hwy No. 39 and its intersection with the northerly line of Lot 3 of St. Clair Plantation, run along said northerly line S.  $63^{\circ} 49' 55''$  E. a distance of 2176 feet more or less to its intersection with the top bank of a canal; thence in a southwesterly direction along said top bank a distance of 3210 feet, more or less, to its point of intersection with the line between Lots 18 and 19 of Mon Plaisir Plantation, thence N.  $64^{\circ} 17' 54''$  W. along said line a distance of 5950 feet, more or less, to its intersection with the mean low water's edge of the Mississippi River; thence in a northerly direction along said mean low water's edge a distance of 3621 feet, more or less, to its intersection with the Northerly line of Lot 3 of St. Clair Plantation S.  $63^{\circ} 49' 55''$  E. along said northerly line a distance of 4053 feet, more or less, to the point of beginning of the tract herein described, all situated in T 13 S – R 12 E Section 6 and T 14 S – R 12 E Sections 1, 2, 3, & 23, and including two (2) docks and their accesses and mooring systems, the upriver dock being approximately 400 feet in length and the downriver dock being approximately 780 feet in length, both including all related structures.

#### Less and Except:

A certain parcel of land situated in T 14 S – R 12 E Section 2, being part of Lot 1 of St. Clair Plantation and being the property of the Parish of Plaquemines measuring 205.00 feet in width along La. State Hwy. No. 3137 by 130.00 feet in depth and containing 0.568 acres and shown on plan of H.B. McCurdy, Jr., R.L.S., dated September 22, 1986.

A certain parcel of land situated in T 14 S – R 12 E Section 2, being part of Lots 21 and 22 of Mon Plaisir Plantation and being the property of La. Power and Light Co., now or formerly, being the 410 foot depth adjoining La. State Hwy. No 3137 in Lots 21 and 22 of said plantation and containing 3.276 acres and shown on plan of Adloe Orr, C.E., dated January, 1920.

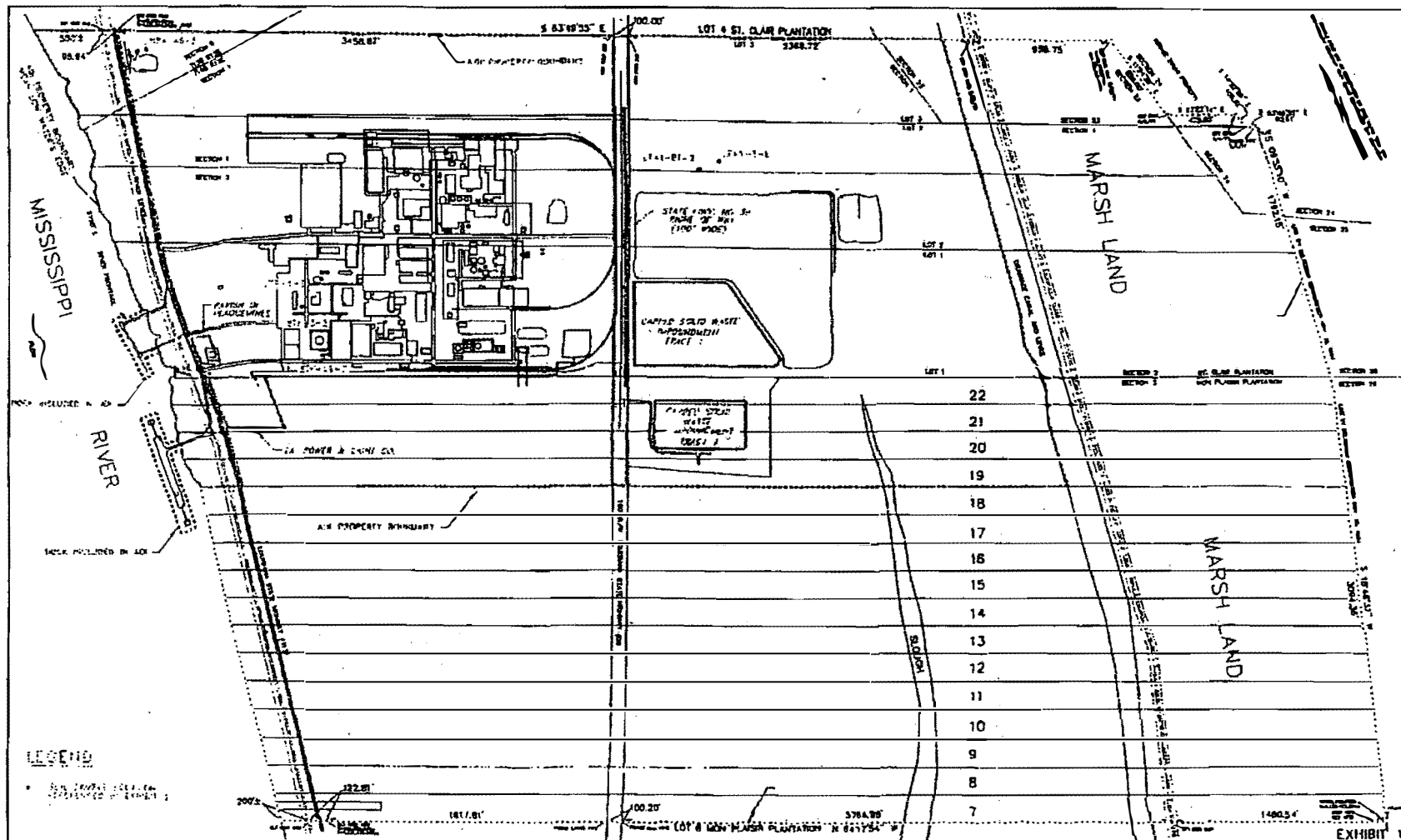
A certain parcel of land situated in T 14 S – R 12 E Sections 1, 2 and 3 and being a part of Lots 1, 2 and 3 of St. Clair Plantation and a part of Lots 19, 20, 21, and 22 of Mon Plaisir Plantation and also being the Right of Way of State Hwy. No. 39 measuring 100 feet in width by 3104 feet, more or less in length.

#### Less and Except:

Tract 1 - A certain piece or portion of ground situated in the State of Louisiana, Plaquemines Parish, St. Clair Plantation, designated as Capped Solid Waste

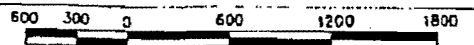
Impoundment 1 and described more fully as follows: commence at the intersection of the easterly right of way line of La. State Highway No. 39 and the line common to St. Clair and Mon Plaisir Plantations; measure thence N 26°09'23" E along said right of way line a distance of 50.88 feet to a point; thence S 63°51'27" E a distance of 4.09 feet to the point of beginning of the tract herein described; thence S 63°51'27" E a distance of 1029.79 feet to the point of curvature of a curve to the left having a radius of 50.00 feet; thence along said curve a distance of 108.88 feet to a point; thence N 8°27'34" W a distance of 618.64 feet to the point of curvature of a curve to the left having a radius of 100.00 feet; thence along said curve a distance of 96.40 feet to a point; thence N 63°51'27" W a distance of 640.60 feet to a point; thence S 26°09'23" W a distance of 623.95 feet to the point of beginning.

Tract 2 - A certain piece or portion of ground situated in the State of Louisiana, Plaquemines Parish, Mon Plaisir Plantation, portion of Arpent Lots 20, 21 & 22, designated as Area of Capped Solid Waste Impoundment 2 and more fully described as follows: commence at the intersection of the easterly right of way line of River Road and the line common to St. Clair and Mon Plaisir Plantation; measure thence along said common line in a southeasterly direction a distance of 2893.23 feet to a point on the easterly right of way line of State Highway 39; thence on an interior angle of 89°36'00" along said easterly line in a southwesterly direction a distance of 168.32 feet; thence on an interior angle of 90°19'00" in a southeasterly direction a distance of 184.96 feet to a point, the point of beginning; measure thence from the point of beginning in a southeasterly direction a distance of 628.24 feet; the angle of 90°18'00" a distance of 340.13 feet; thence on an interior angle of 89°42'00" a distance of 629.87 feet; thence on an interior angle of 90°01'30" a distance of 340.13 to a point, the point of beginning.



LEGEND  
 \* SEE EXHIBIT 1 FOR  
 CONTINGENT EASEMENTS

# CONVEYANCE NOTIFICATION PLAN



WALDEMAR S. NELSON AND COMPANY  
 INCORPORATED  
 ENGINEERS AND ARCHITECTS  
 1200 ST. CHARLES AVE. NEW ORLEANS, LA.

AMAX METALS RECOVERY, INC.  
 BRATTHWAITE, LA.

## CONVEYANCE NOTIFICATION

DATE	SCALE	JOB NO.	DRAWING NO.
3/12/08	AS SHOWN	20040203	RFR_2

PLOT DATE: 3/14/08 12:35 P.M. ACSI FILE: RFR\_1.DWG

EXHIBIT 1

### ENCLOSURE 3

#### SUMMARY OF ENVIRONMENTAL UNITS AT THE AMAX METALS RECOVERY, INC. PORT NICKEL FACILITY INCLUDED IN THE READY FOR REUSE DETERMINATION

SWMU or Area Name	Unit Included in VRP <sup>1</sup>	Action Taken	RECAP Standards Applied
SWMU 01, Tanks 8-TK-1 & 8-TK-2	Yes	No remedial action required	MO-1
SWMU 02, Sumps in Tanks 8-TK-1 & 8-TK-2	Yes	No remedial action required	MO-1
SWMU 9, pH Adjustment Pond	Yes	Excavated and removed contaminated sediment <sup>2</sup>	SO
SWMU 10, Process Water Pond	No	No remedial action required	SO
SWMU 10, Oxidation Pond	No	No remedial action required	MO-1
SWMU 11, Collection Basin	Yes	Excavated and removed contaminated sediment <sup>2</sup>	SO
SWMU 13, Former Landfills B, C, D, E, & F	Yes	No remedial action required	MO-1
SWMU 14, Railcar Unloading Area	Yes	No remedial action required	SO
SWMU 15, Internal Drainage Ditches	Yes	Excavated and removed contaminated sediment/soil <sup>2</sup>	MO-1
SWMU 16, Laboratory Sump	Yes	No remedial action required	MO-1
SWMU 17, Area 9 Recycling Building	Yes	No remedial action required	MO-1
SWMU 19, Drum Storage Area	Yes	No remedial action required	MO-1
SWMU 21, Tanks 8-TK-5 & 8-TK-6	Yes	No remedial action required	MO-1
SWMU 24, Area 21 Empty Drum Storage Area	Yes	No remedial action required	MO-1
SWMU 25, Area 21 Empty Drum Crushing Area	Yes	No remedial action required	MO-1
SWMU 26, Copper Tank House Waste Pile	Yes	No remedial action required	MO-1
SWMU 27, Outdoor Container Storage Area	Yes	No remedial action required	MO-1
SWMU 28, Copper Tank House Bulk Storage Building	Yes	No remedial action required	SO
SWMU 29, Copper Tank House Outdoor Container Storage Area	Yes	No remedial action required	SO
SWMU 32, Southwest Storage Area Sump	Yes	No remedial action required	MO-1
SWMU 33, Area 8 Recycle Process Feed System	Yes	No remedial action required	MO-1
SWMU 39, Area 13 Vanadium Flyash Storage Building	Yes	No remedial action required	MO-1
SWMU 41, R & D Laboratory Sump	Yes	No remedial action required	MO-1
SWMU 42, Underground Storage Tank Waste Pile	Yes	Excavated impacted soil <sup>3</sup>	MO-1
SWMU 43, Vehicle Maintenance Building Sump	Yes	No remedial action required	MO-1
SWMU 44, West Outdoor Container Storage Area	Yes	No remedial action required	MO-1
SWMU 45, Caustic Storage Tank	Yes	No remedial action required	MO-1
SWMU 46, Nickel Sulfide Receiving Area	Yes	Excavated impacted soil <sup>2</sup>	MO-1
SWMU 47, Area 9 Support Material Bulk Storage Area	Yes	No remedial action required	MO-1
SWMU 58, Plant Roads	Yes	No remedial action required	MO-1
AOI 1, Northwest Corner Property Truck Yard Area	Yes	No remedial action required	MO-1
AOI 2, Non-Process Areas	Yes	No remedial action required	MO-1
SWMU 12, Landfill A and A1	No	No remedial action required	MO-1
SWMU 18, NPDES Storm Water Drainage Ditches	No	No remedial action required	SO
Dock Structures	No	No remedial action required	N/A

<sup>1</sup> Certificate of Completion/No Further Action, Amax Metals Recovery, Inc.; Louisiana Department of Environmental Quality, Voluntary Remediation Program (VRP); November 15, 2007.

<sup>2</sup> Excavated sediment and/or soil were placed in the Wastewater Pond/Wastewater Storage Pond Areas.

<sup>3</sup> Excavated soil disposed of off-site at Woodside Landfill in Walker, Louisiana.

**SUMMARY OF ENVIRONMENTAL UNITS AT THE  
AMAX METALS RECOVERY, INC. PORT NICKEL FACILITY  
NOT INCLUDED IN THE READY FOR REUSE DETERMINATION**

<b>SWMU or Area Unit Name</b>	<b>Action Taken</b>
SWMU 8, Reclamation Process Pond	Unit closed in place, and maintained under Solid Waste Permit P-0135
SWMU 10, Wastewater Pond	Permitted consolidation area for contaminated sediment/soil maintained under Solid Waste Permit P-0135
SWMU 10, Waste Water Storage Pond	Permitted consolidation area for contaminated sediment/soil maintained under Solid Waste Permit P-0135

## ENCLOSURE 4

### CURRENT PROPERTY-WIDE ENVIRONMENTAL CONDITIONS

Information concerning the current environmental conditions of the entire Property, including the impacted media, Constituents of Concern (COCs), maximum concentrations of COCs remaining on-site and site-specific limiting RECAP standards is shown in the tables below.

**Table 1. Maximum Remaining Constituents of Concern in Soil**

Constituents of Concern (COCs)	Maximum Concentrations Exceeding SOIL <sub>ni</sub> (mg/kg)	Limiting RECAP Standard (mg/kg)	
Antimony	35.3	82	SOIL <sub>ssi</sub> <sup>2</sup>
Arsenic	4.61 <sup>1</sup>	11.5	SOIL <sub>ssi</sub>
Chromium	927	1,400	SOIL <sub>ssi</sub> <sup>2</sup>
Copper	2,100	6,132	MO-1 SOIL <sub>Li</sub> <sup>2</sup>
Lead	656	1,008	SOIL <sub>ssi</sub>
Molybdenum	907	1,400	SOIL <sub>ssi</sub>
Nickel	41,900	82,000	MO-1 SOIL <sub>Li</sub> <sup>2</sup>
Vanadium	33,600	41,000	MO-1 SOIL <sub>Li</sub> <sup>2</sup>
TPH-D	796	5,119	MO-1 SOIL <sub>Li</sub>

<sup>1</sup> Average concentration for Arsenic

<sup>2</sup> Soil to groundwater pathway was eliminated through SPLP analysis

**Table 2. Maximum Remaining Constituents of Concern in Groundwater**

Constituents of Concern (COCs)	Maximum Concentrations Exceeding SOIL <sub>ni</sub> (mg/kg)	Limiting RECAP Standard (mg/kg)	
4-Bromophenyl phenyl ether	<0.0103	0.01	MDL
1,2-Diphenylhydrazine	<0.0106	0.018	MDL
1,3-Dichlorobenzene	<0.0106	1.431	GW3NDW
2,4,6-Trichlorophenyl	<0.0106	0.026	GW3NDW
2,4-Dinitrotoluene	<0.0006	9.353	GW3NDW
2,6-Dinitrotoluene	<0.0106	5.372	GW3NDW
2-Chlorophenol	<0.0106	4.032	GW3NDW
2-Methylnaphthalene	<0.0106	0.860	GW3NDW
2-Nitroaniline	<0.0532	16.105	GW3NDW
2-Nitrophenol	<0.0106	16.480	MDL
4,6-Dinitro-2-methylphenol	<0.0532	50.240	MDL
4-Chlorophenyl phenyl ether	<0.000243	0.0077	MDL
4-Nitrophenol	<0.0532	42.974	GW3NDW
Benzidine	<0.0426	0.230	MDL
Benzo(g,h,i)perylene	<0.000199	0.00026	WATER sol
Bis(2-Chloroethoxy)methane	<0.000155	0.0050	MDL
Bis(2-Chloroethyl)ether	<0.000357	0.0066	GW3NDW

**Table 2. Maximum Remaining Constituents of Concern in Groundwater (Continued)**

Constituents of Concern (COCs)	Maximum Concentrations Exceeding SOILni (mg/kg)	Limiting RECAP Standard (mg/kg)	
Bis(2-Chloroisopropyl)ether	<0.0106	0.027	GW3NDW
Bis(2-Ethylhexyl)phthalate	<0.0106	0.192	GW3NDW
Carbazole	<0.000214	0.0068	MDL
Dibenzofuran	<0.0006	0.487	GW3NDW
Hexachloroethane	<0.0106	0.056	GW3NDW
Naphthalene	<0.0106	7.024	GW3NDW
Nitrobenzene	<0.0106	3.085	GW3NDW
n-Nitrosodimethylamine	<0.0106	0.027	MDL
n-Nitrosodi-n-propylamine	<0.000124	0.010	GW1
Pyridine	<0.0106	17.206	MDL
Arsenic	0.06	12.4	GW3NDW
Cadmium	0.015	0.043	GW3NDW
Cobalt	0.38	165.688	GW3NDW
Lead	<0.03	0.215	GW3NDW
Molybdenum	2.24	16.899	GW3NDW
Nickel	11.7	28	GW3NDW
Selenium	0.08	0.215	GW3NDW
Silver	0.02	2.319	GW3NDW
Vanadium	0.35	4.495	GW3NDW

**ENCLOSURE 5**

**AGENCY CONTACTS  
AMAX METALS RECOVERY, INC., PORT NICKEL FACILITY**

For a copy of the administrative record providing detailed information regarding environmental conditions at the Amax Metals Recovery, Inc., Port Nickel Facility, please contact:

Louisiana Department of Environmental Quality  
Public Records Center  
Galvez Building, Room 127  
602 North Fifth Street  
Baton Rouge, LA 70802  
(225) 219-3168

For questions regarding the environmental conditions described in the Ready for Reuse Basis of Decision for the Amax Metals Recovery, Inc., Port Nickel Facility, please contact:

Ms. Kristine Carter  
Environmental Technology Division  
Office of Environmental Assessment  
Louisiana Department of Environmental Quality  
Post Office Box 4314  
Baton Rouge, LA 70821-4314  
Telephone (225) 219-3396  
[kristine.carter@la.gov](mailto:kristine.carter@la.gov)

or

Dianna G. Mahony  
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One North Central Avenue  
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