

## MINOR PERMIT REVISION DESCRIPTION

This minor permit revision for Phelps Dodge Morenci Inc. (PDMI) authorizes the company to revise the timeline for implementing monitoring and performance testing requirements for sources not yet constructed at their mine site.

In the significant revision #36424, PDMI was required to conduct the initial test for baseline levels and performance test within 180 days of issuance of the revision. The period of 180 days has elapsed and PDMI has not been able to complete the work on the equipment/items permitted under Significant Revision #36424. In view of this, PDMI has requested that the time period of requirement of initial testing and conducting performance testing be revised as per A.A.C.R 18-2-312.

The above changes meet all the requirements of a minor permit revision.

### ATTACHMENT "B"

#### SPECIFIC CONDITIONS

**Addenda (Minor Permit Revision #41833) to Operating Permit No. M110734P1-99 for  
Phelps Dodge Morenci Inc. - Morenci Mine**

The following conditions shall be replaced in the requirements set forth in Attachment "B" of Operating Permit No. M110734P1-99 as revised by Significant Revision No. 36424.

Condition II.C.2.c.(1) in Attachment "B" shall be amended to read as follows:

- II.C.2.c.(1) Within 60 days after the In Pit Crusher (IPC) #2 has achieved the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start-up, the Permittee shall conduct one certified Method 9 observation on fabric filter DC-002 while it is operating at normal representative working conditions to establish a baseline opacity level. Within 30 days of establishing the baseline opacity, the Permittee shall report the results to the Director. [A.A.C. R18-2-312]

Condition II.C.2.e.(2) in Attachment "B" shall be amended to read as follows:

- II.C.2.e.(2) Within 60 days after the In Pit Crusher (IPC) #2 has achieved the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start-up, the Permittee shall conduct performance test for particulate matter on the stack #002 of fabric filter DC-002 (Process #006). The performance test shall be used to demonstrate compliance with the voluntarily accepted limits in Condition II.A.2.c. [A.A.C. R18-2-312]

Condition III.E.2 in Attachment "B" shall be amended to read as follows:

- III.E.2. Within 60 days after the affected units subject to this section achieve the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start up, the Permittee shall conduct performance tests for particulate matter emissions on Stack #s 002, 005, 006, 007, and 008 on

Process #s 006, 225, 228, 229, and 230 respectively, and furnish the Director a written report of the results of the test. The performance tests shall be used to demonstrate compliance with the voluntary limitation accepted in Condition III.C.2. [A.A.C. R18-2-312.A]

Condition IV.C.1.d.(4) in Attachment “B” shall be amended to read as follows:

IV.C.1.d.(4) Within 60 days after the affected units subject to this section achieve the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start up, the Permittee shall conduct one set of performance tests for particulate matter on the following stack #s 013, 014, 015, 016, and 017 (Process #s 30, 31, 32, 35, and 36, respectively) and furnish the Director a written report of the results of the test. [A.A.C. R18-2-312.A]

Condition VII.C.1 in Attachment “B” shall be amended to read as follows:

VII.C.1. Within 60 days after the affected units subject to this section achieve the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start up, the Permittee shall conduct one certified Method 9 observation on the bin vent filters on Lime Silo #s 1 and 2 during lime loading of the silos during normal representative loading conditions to establish a baseline opacity level. Within 30 days of establishing the baseline opacity, the Permittee shall report the results to the Director. [A.A.C. R18-2-312.A]

Condition XVI.C.1 and 4 in Attachment “B” shall be amended to read as follows:

XVI.C.1. Within 60 days after the affected units subject to this section achieve the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start up, the Permittee shall conduct one certified Method 9 observation on the stacks associated with the CLP while operating at normal representative working conditions to establish a baseline opacity level. Within 30 days of establishing the baseline opacity, the Permittee shall report the results to the Director. [A.A.C. R18-2-312.A]

XVI.C.4.a. Within 60 days after the affected units subject to this section achieve the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start up, the Permittee shall conduct performance test for particulate matter emissions from the “Concentrate Leach Plant” (CLP) operations on Stack #s 097 and 099 (corresponding process #s 239 and 243 respectively). The performance test shall be used to demonstrate compliance with the voluntary limitation accepted in Condition XVI.A.1.c. EPA Reference Method 5 in 40 CFR 60, Appendix A and EPA Reference Method 202 specified in 40 CFR 51, Appendix M shall be used to determine emissions of particulate matter. [A.A.C. R18-2-312.A]

XVI.C.4.b Within 60 days after the affected units subject to this section achieve the capability to operate at the maximum production rate on a sustained basis but no later than 180 days after initial start up, the Permittee shall conduct performance test for volatile organic compounds from the CLP operations on Stack #097 (corresponding process #239) of PLVs. The performance test shall be used to

demonstrate compliance with the voluntary limitation accepted in Condition XVI.A.3.d. Performance tests shall be conducted and data reduced in accordance with the EPA Reference Method 25 to determine the VOC emission rate from the stack of PLVs. [A.A.C. R18-2-312.A]