Message

From: Wakeland, Morton [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3372623A45BE4D0FA0E18207E8BB682F-WAKELAND, MORTON]
Sent: 5/18/2017 5:40:39 PM
To: Bhakta, Rajesh [rbhakta@fmi.com]
Subject: RE: Question regarding TRI Reporting for 2014 - Phelps Dodge, El Paso, Texas

I think from you explanation that the compounds formed with As are of a non-arsine variety 99% of the time.
Only in rare instances would arsine be generated.

Again, thank you for your information.

Best, Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
EPCRA 313 Enforcement & TRI Program Coordinator
U.S. EPA Region 6
Compliance Assurance & Enforcement Division
Waste Compliance III Section (6EN-H3)
Dallas, Texas 75202
214.665.8116

From: Bhakta, Rajesh [mailto:rbhakta@fmi.com]
Sent: Thursday, May 18, 2017 12:34 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Bhakta, Rajesh <rbhakta@fmi.com>
Subject: RE: Question regarding TRI Reporting for 2014 - Phelps Dodge, El Paso, Texas

Mr. Wakefield,

I was travelling yesterday afternoon and apologize for the slightly delayed response.

We have a plant that produces nickel carbonate that has the potential to generate arsine ***under specific process upset conditions***. Per our Refinery Permit # 8647, this is listed as a ***potential*** source of arsine at maximum rate of 0.15 TPY.

The condition that ***could*** generate arsine only occurs if the copper concentration in the solutions being processed at the nickel carbonate plant are very low. Given the hazardous nature of arsine gas, we do everything possible to monitor and control the copper concentration in the process to ensure the low copper condition does not occur. As a result, for the reporting years under review we did not have a single event of that nature and thus no arsine releases to air were reported under TRI nor our annual emission inventory reporting to TCEQ.

I hope this explanation is clear and satisfies your needs. If not, please feel free to contact me.

FREEPORT-MCMORAN
Rajesh Bhakta
Sr. Environmental Engineer

Environmental Services
El Paso Operations
Office: (915) 782-7353

From: Wakeland, Morton [mailto:wakeland.morton@epa.gov]
Sent: Wednesday, May 17, 2017 11:58 AM
To: Bhakta, Rajesh <rbhakta@fmi.com>
Subject: RE: Question regarding TRI Reporting for 2014 - Phelps Dodge, El Paso, Texas

May I confirm then that arsine, AsH_3, is not a compound formed in your processing.

Thanks for helping!
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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From: Bhakta, Rajesh [mailto:rbhakta@fmi.com]
Sent: Wednesday, May 17, 2017 12:41 PM
To: Wakeland, Morton <wakeland.morton@epa.gov>
Cc: Bhakta, Rajesh <rbhakta@fmi.com>
Subject: RE: Question regarding TRI Reporting for 2014 - Phelps Dodge, El Paso, Texas

Mr. Wakeland,

Thank you for your inquiry. As requested, I have carefully reviewed our TRI records for RY 2014 and 2015 with respect to the arsenic compound Form Rs.

I confirm that indeed the quantities reported as released or waste managed are for arsenic metal only, and not for any arsenic compound. These numbers are generally derived from analytical assays completed for the various materials.

Regarding the specific arsenic compound, there are multiple compounds formed as part during various operations in our metal recovery processes. These compounds enter our processes as minor impurities in the form of oxides or sulfides, and are converted into by-products in the form of carbonates, hydroxides, sulfates, acids, oxides and potentially other compounds.

I am not sure of the reason for your inquiry, but am happy to discuss any of these matters with you at your convenience.

Kind regards,

FREEPORT-MCMORAN
Rajesh Bhakta
Sr. Environmental Engineer
Environmental Services

El Paso Operations
Office: (915) 782-7353

From: Wakeland, Morton [mailto:wakeland.morton@epa.gov]
Sent: Tuesday, May 16, 2017 10:43 AM
To: Bhakta, Rajesh <rbhakta@fmi.com>
Subject: Question regarding TRI Reporting for 2014 - Phelps Dodge, El Paso, Texas
Importance: High

You are listed as the technical contact on Phelps Dodge's 2014 and 2015 Form R reports for arsenic compounds.

My initial question is with respect to the reporting of arsenic compounds.

#1 Are the amounts displayed on the Form R, the amounts of only arsenic released and or waste managed
or amounts of arsenic compounds released or waste managed?

Note the EPCRA 313 requirements for the reporting of metal compounds:

Q&A Preview

108. How are threshold determinations made for metal-containing compounds?

Threshold quantities for metal compounds are based on the total weight of the metal compound, not just the metal portion of the metal compound. The threshold quantities are determined by adding up the total weight of all metal compounds containing the same parent metal. However, release and other waste management calculations are based solely on the weight of the parent metal portion of the metal compounds. Note that there are a few metal compounds that are separately listed and are not counted in the metal compounds categories. For example, maneb (CAS number 12427-38-2) is a manganese compound that is a separately listed chemical and is not reportable under the manganese compounds category.

You should have this information readily available due to EPCRA 313's record retention requirement.

Furthermore, we wish to clarify exactly what the form of the compound is with As?

Please respond as soon as possible.

Thank you,
Mort

Morton E. Wakeland, Jr., Ph.D. ("Mort")
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