



  
consulting  
scientists and  
engineers

MFG, Inc.  
P. O. Box 3449  
Coeur d'Alene, ID 83816  
208/667-2948  
Fax: 208/667-1739

April 20, 2006

Ms. Cheryl Woodall  
Gifford Pinchot National Forest  
10600 N.E. 51<sup>st</sup> Circle  
Vancouver, WA 98682

**SUBJECT: AZURITE MINE SITE – RESPONSE TO U.S. FOREST SERVICE COMMENTS ON THE DRAFT RISK ASSESSMENT AND REQUEST FOR SPECIFIC GUIDANCE**

Dear Cheryl:

On behalf of ASARCO LLC (Asarco) and based on our conference call on Wednesday, April 19, 2006, MFG, Inc. proposes to address the U.S. Forest Service's (USFS) comments on the Draft Risk Assessment for the Azurite Mine Site in Whatcom County, Washington (dated March 15, 2006) by submitting a revised risk assessment that is modeled after the Kromona Mine and Millsite Risk Assessment Work Plan and the forthcoming Final Kromona Mine Risk Assessment. The revised Azurite Mine risk assessment will be submitted to the USFS within 30 days of the receipt of the Final Kromona Mine Risk Assessment.

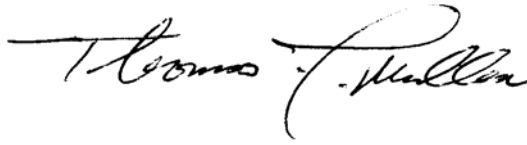
To aid in the development of a document that meets the needs and expectations of the USFS, MFG respectfully requests the USFS to provide MFG with the specific approaches and/or components that will be expected in the revised risk assessment. These approaches and/or components include, but are not limited to:

- Methodological approach expected for the human health and ecological quantitative risk assessments;
- Level of detail required for a quantitative risk assessment;
- Expected approach for developing sampling distributions for sample sizes of 3 or less;
- Incorporation of SI data into the risk assessment (how to handle single sample data for locations other than those sampled in the EE/CA);
- Assumptions to use for the assessment of risk upon the catastrophic failure of the waste rock pile;
- Specific threatened and endangered species to use in the risk assessment; and
- Specific contaminants of potential interest (COPIs).

By incorporating the USFS's input as to the scope and level of detail into the revised Azurite Mine risk assessment, MFG will be able to provide the USFS with a more comprehensive and defensible document. If you have any questions, or wish to discuss any items further, please do not hesitate to contact me at (208) 667-2948.

Ms. Cheryl Woodall  
April 20, 2006  
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Sincerely,  
MFG, INC.

A handwritten signature in black ink, reading "Thomas F. Mullen". The signature is written in a cursive style and is positioned to the left of a vertical red line.

Thomas F. Mullen, P.G.  
Senior Hydrogeologist

TFM:bms  
Enclosure

cc: J.C. Pfahl – Asarco  
Tom Hakonson - MFG

Response to Comments Letter