



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #5
Final Polrep
Iron King Mine 3
09MX
Dewey-Humboldt, AZ
Latitude: 34.4647392 Longitude: -112.1966734

To: Harry Allen, EPA Region 9
Dan Meer, EPA Region 9
Enrique Manzanilla, EPA Region 9

From: Christopher Weden, On-Scene Coordinator

Date: 6/30/2017

Reporting Period: 6/20-30/2017

1. Introduction

1.1 Background

Site Number:	09MX	Contract Number:	EP-S9-1201
D.O. Number:	9070	Action Memo Date:	1/25/2017
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	4/17/2017	Start Date:	4/17/2017
Demob Date:		Completion Date:	
CERCLIS ID:	AZ0000309013	RCRIS ID:	
ERNS No.:		State Notification:	ADEQ
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Removal at NPL Site

1.1.2 Site Description

The Removal Program continues to assist the Remedial Program by conducting a second interim removal action at this Site. Site features include the Iron King Mine and vicinity, the Humboldt Smelter, impacted surface waterways and residential properties. This Action will address threats to human health and the environment from soils with elevated levels of arsenic and lead on residential properties.

Previous removal actions took place at the Site in 2006 and again in 2011, each focusing predominantly on residential properties. In 2006 ERS conducted sampling at 17 residential properties in the vicinity of the Chaparral Gulch and directed excavation of contaminated soils from 4 of these properties under an enforcement agreement with the Ironite Products Company. In 2011, ERS conducted removal actions at 11 additional residential properties in the vicinity of Sweet Pea Lane. These properties were located downgradient of the smelter and ore cart conveyance rail tracks. Also in 2011, one distinct tailings pile, located on the Iron King Mine property but adjacent to one residential property, was removed. Excavated soils from each of these actions were disposed at the Iron King Mine.

At the time of the 2011 Action Memo, EPA had assessed approximately 190 residential yards. Further Remedial Investigation activities at the Site took place in multiple phases between 2012 and 2016. In 2016, EPA completed the Remedial Investigation at the Site, after sampling an additional 190 residential and commercial properties, bringing the total to approximately 380. Most of the additional 190 properties were residential. During this time, EPA also completed a full Site-specific risk assessment including a Site-specific bioavailability determination in order to refine removal action Site cleanup goals.

Among the additional 190 residential properties sampled, 35 additional residential yards were identified with contamination that posed an unacceptable threat to human health for residents living at those properties, especially children. Lead at concentrations up to 20,500 mg/kg and arsenic at levels up to 1,630 mg/kg are present at some of these properties. These additional properties had not yet been sampled at the time of the previous Action Memorandum. These 35 residential yards represent the basis for the continuation of the response.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Contaminated soils and debris from 31 of the 35 sites identified for this removal action have been placed atop the Iron King Mine tailings pile. The contaminated soils have been spread across the top of the tailings pile and should host wind-blown grasses as did the spoils from previous removals. The contaminated soils removed were replaced with clean imported soil that was graded, moisture conditioned, and compacted. The debris was stock-piled atop the tailings pile and ultimately disposed at the municipal landfill. Dust control was paramount, so two water trucks ran full time during excavation activities. START maintained air sampling for dust/particulates around all areas that were excavated. As excavation at each property was completed and prior to backfill, START took soil samples, performed XRF analysis, and based on sample results determined if placing a visual barrier (orange construction fence) was warranted. This visual barrier was placed on the bottom of excavated areas where the soil concentration of lead and/or arsenic exceed the Action Level. Often, ERRS would first excavate an additional 6 inches in an effort to eliminate the need for a visual barrier. More often than not, this was successful.

2.1.2 Response Actions to Date:

June 19-24: Continued excavation, back-filling, and compaction operations at site 107B. Midday temps exceeded 100F

June 26-29: Began excavation of strip between driveways of sites 107B and 203B. Began grading sites 222, 2408, 2409, 2410 (Peloso Trust) for hydroseeding. Common soil imported directly to site 107B.

Friday, June 30: Access to office trailers and other equipment is cut off by a road block due to the Goodwin Fire.

Backfill at sites 107B, 203B and 105B is complete. Repairs to the long gravel driveway at site 203B (710 ft) completed. Installation of the sprinkler system and topsoil at 107B completed but will not have sod in place until next July 6 or 7. Installation of the fence between site 203B and 107B is slow due to a lot of rock and will need a jack hammer to set most of the posts. Fence fabric will be installed on Monday or Wednesday.

Saturday, July 1: Access to office trailers and other equipment is still cut off by a road block due to the wild fire.

Hydro-seeding on sites 222, 2408, 2409, 2410 (Peloso Trust) completed. Remaining boulders set in place to secure access to the property per owner request.

START and ERRS met with Ed Hanks of D-H Public Works after the road plates were removed. The only asphalt damage occurred at the exit from the laydown yard (Peloso Trust) on Hecla St. ERRS will arrange for repair with D-H Public Works. All of the rest of the asphalt work areas were protected by the road plates.

Monday, July 2: Iron King Rd. is still closed, but the road blockade was moved back about 100 ft at the entrance, allowing access to the office trailers and other equipment at that location. Office trailers and Conex box demobilized. Emergency management personnel staged at the blockade, escorted the two heavy haul trailers to the top of the repository to pick up the excavator and sheep-foot roller for demobilization. Remaining equipment has been taken "off-rent" and staged outside the IKM gate per vendor request. They will demobilize at their leisure. All contractors demobilized.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics thru COB 6/28/2017

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Pb/As	Soil	10,025 CY	N/A		
Non-Haz	Debris	407 CY	N/A		
Pb/As	Rock	53 CY	N/A		

2.2 Planning Section

No information available at this time.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

ERRS Costs to date thru 06/28/2017

START costs to date thru 06/29/2017

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,968,000.00	\$1,326,855.08	\$641,144.92	32.58%
START	\$500,000.00	\$339,714.95	\$160,285.05	32.06%
Intramural Costs				
USEPA - Direct	\$90,000.00	\$55,000.00	\$35,000.00	38.89%
USEPA - InDirect	\$1,375,742.00	\$825,000.00	\$550,742.00	40.03%

Total Site Costs	\$3,933,742.00	\$2,546,570.03	\$1,387,171.97	35.26%
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* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

1 OSC, 2 START, and 10 ERRS

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.