

Katie Hobbs
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Via email

February 17, 2023
FPU 23-162

Mr. Jeffrey A. Dhont
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street Mail Stop SFD-6-2
San Francisco, CA 94105

Re: *Draft Proposed Plan Layout and Redline Copy, Iron King Mine / Humboldt Smelter Superfund Site, dated January 11, 2023 and January 24, 2023*

Dear Mr. Dhont:

The Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and our contractor Matrix Design Group has reviewed the above-referenced documents. ADEQ provides the Environmental Protection Agency (EPA) with concurrence of the proposed Alternative 3B for remedial actions. ADEQ provides the following comments in regard to the drafted Proposed Plan:

General Comments

1. The drafted Proposed Plan text and the drafted Fact Sheet for the Proposed Plan contain the same terms which use different acronyms for example Iron King Mine Humboldt Smelter is referred through the Proposed Plan draft as IKM/HS Site but in the Fact Sheet as IKM. ADEQ suggests utilizing the same acronyms for both documents for consistency.
2. The draft Proposed Plan text throughout the report indicates the repositories would be inspected periodically and maintained, but does not provide additional detail. ADEQ suggests elaborating on the specifics for the future once the operation and maintenance period begins.
3. The residential yard cleanup as described throughout the draft Proposed Plan text does not provide clarity on how the yards for additional cleanup will be determined or how residential yards historically cleaned up will be addressed (for example: if additional data will be collected to determine if yards may need to be cleaned up as part of the remedy). Additionally, the drafted text does not provide details on if institutional controls, permits, etc. will be implemented for those residential yards where a warning barrier is placed which may be transferred with property ownership. ADEQ suggests expanding the section on residential yard clean ups or providing a separate document such as a frequently asked questions sheet or flyer

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which may be referred to or linked to the Fact Sheet and Proposed Plan as a website, included in the town Newsletter or handed out during the Proposed Plan Public Hearing.

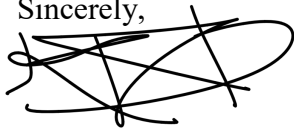
Specific Comments

4. Draft Proposed Plan Layout, Figure 2. Major Site Areas: ADEQ suggests labeling the Galena Gulch
5. Draft Proposed Plan Layout, hyperlink for the smelter project included on page 9, provides a 404-page not found on the ADEQ website. Please ensure the hyperlink is corrected.
6. Draft Proposed Plan Layout, Figure 4. Contamination Levels in Site Areas, page 10: ADEQ suggests including a legend on this figure.
7. Draft Proposed Plan Layout, the hyperlink provided to the Remedial Investigation, on page 12 links to a Superfund Site Information “no site is found: error page on the EPA’s website. Please ensure the hyperlink is corrected.
8. Draft Proposed Plan Layout, Iron King Mine Tailings Pile, page 12: ADEQ suggests including a link or reference to where thresholds of contaminants are located or include the information in this section for clarity.
9. Draft Proposed Plan Layout, Table 2: please provide a title for the table, additionally ADEQ suggests for the second column labeled “Assumed Human Health Risk Exposure Scenario” to be changed to “Evaluated Human Health Risk Exposure Scenario”

Please note, upon completion of the review of all of the comments, the EPA should ensure any changes made to the drafted Proposed Plan or drafted Fact Sheet for the Proposed Plan are incorporated throughout the report and fact sheet for consistency.

If you have any questions or need additional information, please contact me at 602-771-0167 or Kane-DeVries.Katelyn@azdeq.gov.

Sincerely,



Katelyn Kane-DeVries, RG
Project Manager
Federal Projects Unit

C: David Conner, Matrix Design Group

Attachment: Supplemental Considerations

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- A. The drafted Proposed Plan text contains technical terms which the general public would not recognize. ADEQ suggests utilizing more common terms to make the report more comprehensible for the general public. ADEQ offers these edits in a track changes of the Redline Copy of the draft Proposed Plan, as a separate document, previously supplied to EPA on February 10, 2023.
- B. There are format issues (e.g. page numbering, spacing errors, and spelling errors) that should be corrected prior to issuing the next version of document. Please revise based on professional discretion, ADEQ offers these edits in a track changes of the Redline Copy of the draft Proposed Plan, as a separate document, previously supplied to EPA on February 10, 2023.
- C. The drafted Proposed Plan text in some sections is repetitive in content. For example, the Site Background Section states “*The former mine is located immediately west of Arizona State Highway 69, and the former smelter lies about a half-mile east of Arizona State Highway 69*” in both the Setting and Site History paragraphs. ADEQ suggests revising sections with the same content included twice, so that the statements are only noted once per section.
- D. The meaning of multiple acronyms is not provided during the first use of the acronym in the document text. Please review the document to confirm the meaning of the acronym is provided at its first use. ADEQ offers these edits in a track changes of the Redline Copy of the draft Proposed Plan, as a separate document, previously supplied to EPA on February 10, 2023.
- E. The hyperlink provided for obtaining copies of referenced documents, IKM/HS Administrative Record file links to the general Iron King Mine Humboldt Smelter EPA webpage. ADEQ suggests changing the hyperlink to the Iron King Mine – Humboldt Smelter Site Documents & Data webpage (<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.docdata&id=0905049>).
- F. Draft Proposed Plan Layout, Figure 1. The Superfund Process: ADEQ suggests highlighting the current step of the process the site is on.
- G. Draft Proposed Plan Layout, Picture of Smelter operations prior to 1905, page 5: ADEQ suggests revision of the caption to Humboldt Smelter operations prior to 1905.
- H. Draft Proposed Plan Layout, Pictures on Page 6: ADEQ suggests labeling the pictures with greater detail on location for example picture on top right side of page caption: Former Humboldt Smelter brick smelter stack and converter flue building located on Humboldt Smelter plateau.
- I. Draft Proposed Plan Layout, page 17, photograph of Agua Fria River: ADEQ suggests adding to the caption to include where in proximity to the site the picture was taken.

- J. Draft Proposed Plan Layout, Table 4. Comparison of Alternatives: ADEQ suggests moving the comment regarding Alternative 1 as a footnote at the bottom of the table instead of the current placement on the upper left most title block.