



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

Superfund Division

February 17, 2016

Ms. Yvonne Kimball, Town Manager  
Town of Dewey-Humboldt  
Humboldt Station  
2735 South Highway 69  
Dewey-Humboldt, Arizona 86329

RE: An Update on EPA Activities at the Iron King/Humboldt Smelter Superfund Site

Dear Yvonne:

Here at EPA, we are aware that we have not made contact with the Town for some time. I would therefore like to provide you and the Council with a brief update about our activities at the Iron King Mine/Humboldt Smelter (IKHS) Superfund site. If you could please forward a copy of this letter to councilmembers, it would be greatly appreciated. Let me begin by affirming that we continue to make progress on the site towards its remediation, though the timing of our work may understandably seem extended.

When we visited Dewey-Humboldt last year, we provided an overview of our cleanup remedy selection process along with an update on new information about residential and non-residential aspects of the site. Our primary focus, however, was on providing information about our sampling of residential yards. To this end, we provided community members with a fact sheet and showed residents detailed, color-coded maps of arsenic and lead levels found in yards. We had concluded at that time that soils at the great majority of the almost 600 residential yards we had evaluated did not pose a site-related unacceptable risk to residents. However, some yards did have levels that could pose a long-term risk. Owners of all homes we sampled in 2014 received letters with their results. In addition, we called those whose yards had clearly elevated levels of arsenic and lead to provide guidance and answer questions.

At the time of our last visit, we mentioned that we had not yet completed a critical piece of our work: the human health risk assessment. This evaluation looks in greater depth at all the yards – along with non-residential areas – and evaluates the actual site-related health risks that might exist from all metals and exposure pathways at the site. We use this more complete evaluation when making decisions about which yards will require cleanup actions.

We now have the human health risk assessment in full draft. In addition, we have also drafted the full remedial investigation report. We would like to finalize these reports and provide them to the Town and the public, with outreach, in about 2-3 months' time. The remedial investigation presents and analyzes the extensive sampling and other field work conducted over the last few years and characterizes the nature and extent of contamination at the entire IKHS site. This

information informs how we design cleanup options, not only for those residential yards that are affected, but also for the site's non-residential areas: the mine pile, the Chaparral Gulch, the smelter property and tailings swale, the great tailings flood plain, the dam, and the pathway to the Agua Fria River. Because the tailings are toxic, these non-residential areas do pose potential future environmental and human health risks if not addressed.

While it has been our intention to have returned to the Council and the public by now, we have been waiting to complete further outreach until, instead of reiterating that we are completing studies and working on reports, we can instead provide more tangible information about what we plan to *do* at the site, especially for residential properties. We are nearing the point where we can provide this information. Here are some elements of the current plan and status:

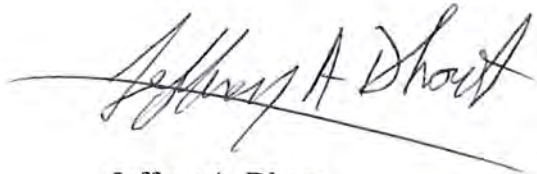
First, we are placing our highest priority on the cleanup of residential yards. We would like to focus first and foremost on mitigating any health risks where people live, and we are aware that uncertainty about whether cleanup actions will be required at a property can potentially affect home sale decisions. We are attempting to use an authority called "removal authority" at the site, which would allow us to take faster action at those yards where cleanup is required. This would also allow residents whose yards do not require any action to move forward knowing that their yards are not adversely affected by the site.

With the completion of our more thorough risk assessment, we will next be deciding our target cleanup levels for residential yards. At that point, it will be very important that we do significant outreach with the community.

In addition, we are also investigating *what* we would do at yards that require cleanup. So far, the residential cleanups we have completed at this site have entailed removing contaminated soil and replacing it with clean soil. However, we are also currently evaluating other cleanup options in order to identify the most efficient – and effective – cleanup method.

Though we cannot yet schedule our next public meeting, we hope to do so soon. In the meantime, if you or the Town Council have any questions, please do not hesitate to contact us, and we will certainly endeavor to answer them. We thank you for your patience with our process, and we look forward to speaking with you soon.

Sincerely,



Jeffrey A. Dhont  
Remedial Project Manager  
Superfund Division



Heather Parker  
Community Involvement Coordinator  
Superfund Division