

**From:** [John Peterson](#)  
**To:** [Dhont, Jeffrey](#)  
**Cc:** [michael\\_pompliano](#); [John Peterson](#)  
**Subject:** Iron King Mine - Humboldt Smelter FS  
**Date:** Wednesday, September 22, 2021 2:52:42 PM  
**Attachments:** [ADEQ review rtcs and redline IKHS FS 22 sept 2021.pdf](#)

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Jeff,

ADEQ and our contractor Matrix Design Group reviewed responses to comments and the following redline document prepared by Tetra Tech for the U.S. Environmental Protection Agency, Region 9:

- *Draft Feasibility Study, Iron King Mine / Humboldt Smelter Superfund Site, September 2021.*

ADEQ comments on the above referenced document are included in the attached PDF. Please contact me if you have any questions. Thanks.

ADEQ may add or amend ADEQ comments if evidence to the contrary of our understanding is discovered; if received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was signed or electronically delivered; if other parties bring valid and proven concerns to our attention; or site conditions are deemed not protective of human health and the environment within the scope of this Department.

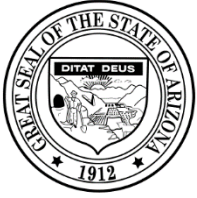
## John R. Peterson

Project Manager, Federal Projects Unit  
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Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

September 22, 2021  
FPU 22-053

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

Re: *Redline Draft Feasibility Study, Iron King Mine / Humboldt Smelter Superfund Site, September 2021.*

Dear Mr. Dhont:

The Arizona Department of Environmental Quality (ADEQ) reviewed the above-referenced document and EPA/Tetra Tech's responses and has the following comments:

The EPA/Tetra Tech responses are satisfactory and have been incorporated in the FS as indicated with the following exceptions:

1. The figure edits could not be checked given revised figures were not provided with the backcheck documents.
2. The table edits could not be checked given revised tables were not provided.

#### Follow-on Comments

1. There are format issues (hanging headers, page number issues, spaces prior to periods) that should be cleaned up before issuing the next version of the FS.
2. Executive Summary, Page 1, Second Paragraph, First Sentence. The text reads "This executive summary presents the key findings and results of the *Feasibility Study Report, Iron King Mine – Humboldt Smelter Superfund Site, Dewey-Humboldt, Yavapai County, Arizona* (FS Report), dated June 2021." The cover indicates September as the publication date, please review and revise.
3. Section ES4.0. This section would benefit with the addition of figures depicting each of the remedial alternatives.
4. Section ES6.1, Third Paragraph, Last Sentence. The text reads "Under Alternative 4, the off-site disposal repository would also likely require similar long-term maintenance" If

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Alternative 4 includes the complete removal and off-site disposal of waste, please explain how this alternative has similar long-term maintenance as the alternatives which include on-site repositories.

If you have any questions or need additional information, please contact me at 602-771-2234 or [peterjohn@azdeq.gov](mailto:peterjohn@azdeq.gov).

Sincerely,

A handwritten signature in cursive script that reads "John R. Peterson".

John R. Peterson  
Project Manager  
Federal Projects Unit

cc: Michael Pompliano, Matrix Design Group