

From: [John Peterson](#)
To: [DHONT, JEFF](#)
Cc: [Mike Gronseth](#); [John Peterson](#)
Subject: Iron King Mine - Humboldt Smelter Site Identification and Initial Screening of Potential Technologies and Process Options Technical Memorandum
Date: Thursday, June 27, 2019 3:32:22 PM
Attachments: [ikmhs_adeq_comments_draft_comparative_analysis_of_technologies_tm_27_june_2019.pdf](#)

Jeff,

ADEQ and our contractor Matrix Environmental reviewed the following document prepared by Tetra Tech for US EPA:

- *Iron King Mine-Humboldt Smelter Site Identification and Initial Screening of Potential Technologies and Process Options Technical Memorandum.*

ADEQ comments are included in the attached PDF. If you have any questions or need additional information, please contact me.

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 Peterson

Project Manager, Federal Projects Unit
Waste Programs Division
Ph: 602-771-2234



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Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

June 27, 2019
FPU 19-262

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 Iron King Mine – Humboldt Smelter Site Identification and Initial Screening of Potential Technologies and Process Options Technical Memorandum* dated 18 June 2019.

Dear Mr. Dhont:

The Arizona Department of Environmental Quality (ADEQ) reviewed the above-referenced document and has the following comments:

GENERAL COMMENTS

1. The technical memorandum is well organized and presents technologies and process options typically used at mine waste sites.
2. The memorandum defines acronyms in the text, however a list of acronyms is not included. Please add this list for completeness.
3. Technologies are not presented for addressing mine works (i.e., adits, open boreholes, collapsed shafts) that are present in the area. Please add a section to present available technologies to address these physical hazards at the site.

SPECIFIC COMMENTS

1. **Page 1, Section 1.0, First Paragraph, Third and Fourth Sentences:** The third sentence reads “Concentrations of some chemicals of interest were detected above screening levels in groundwater and air during the remedial investigation...” The fourth sentence indicates that groundwater and air will be remediated through the remedial actions associated with contaminated soil, sediment, and surface water. The technical memorandum does not identify contingent actions that would be required if concentrations of the chemicals of interest remain above screening levels. Please identify which technologies and process options would be utilized in

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a contingent action to treat groundwater for example if screening levels continue to be exceeded following implementation of remedial actions at the site.

2. **Page 4, Section 4.2, Second Paragraph, Fourth Sentence:** The sentence states that the dross is an uncontaminated waste. The following sections indicate that the dross may need to be disposed of in a RCRA compliant landfill. Please rectify this inconsistency in the technical memorandum.

If you have any questions or need additional information, please contact me at 602-771-2234 or peterjohn@azdeq.gov.

Sincerely,



John Peterson
Project Manager
Federal Projects Unit

cc: Mike Gronseth, Matrix Environmental