

From: [John Peterson](#)
To: [DHONT, JEFF](#)
Cc: [Mike Gronseth](#); [John Peterson](#)
Subject: Iron King Mine - Humboldt Smelter Site Soil Borrow and Material Balance Technical Memorandum
Date: Thursday, June 27, 2019 1:52:38 PM
Attachments: [ikmhs_adeq_comments_draft_borrow_source_material_balance_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 Soil Borrow and Material Balance 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 19-261

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 Soil Borrow and Material Balance
Technical Memorandum dated 14 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. Acronyms and Abbreviations List – there are numerous instances of acronyms being defined in the text (i.e., bgs) that are not included in the list. In addition, several acronyms are included on the list (i.e., G) that are not used in the text. Finally, there are several instances in which the acronym definition included on the list doesn't match the corresponding acronym definition presented in the text (i.e., MTPL). Please review the text and coordinate the acronyms and abbreviations list as appropriate.
2. Table of Contents - List of Figures – the titles for Figures 1-1 through 5-4 do not match the actual titles on the corresponding figures. Please review and correct.

SPECIFIC COMMENTS

1. **Page 5, Section 3.0, First Paragraph – South of MTP Blowout Area, Third Sentence:** The sentence reads “The upper foot has a pH less than below 4,…” Please revise to read “The upper foot has a pH less than 4,…”
2. **Page 7, Section 4.0, First Paragraph, Last Sentence:** Please change the table reference to 4-2 to be consistent with the table title.

3. **Page 7, Section 4.0, Second Paragraph, Last Sentence:** Please change the table reference to 4-1 to be consistent with the table title.

4. **Page 15, Section 6.3, Fourth Paragraph, First Sentence:** The text indicates that the potential capacity of the STS repository is approximately 1,155,000 CY. The text also suggests that the capacity would be increased by 25,000 CY (to a total of 1,180,000CY) if the wastes already in-place are included. This is confusing as the actual capacity to add waste in this area is the volume remaining taking into account the volume of waste already in-place. Please review and revise the text to indicate the residual volume that is available for waste placement.

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