

From: [John Peterson](#)
To: [DHONT, JEFFE](#); [Ueno, Karen](#)
Cc: [John Peterson](#)
Subject: Iron King Mine-Humboldt Smelter
Date: Monday, February 25, 2019 11:55:02 AM
Attachments: [ikmhs_adeq_comments_draft_fs_strategy.pdf](#)

Jeff Dhont and Karen Ueno,

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

- *FS Strategy, Objectives, Data Needs and Schedule, Iron King Mine-Humboldt Smelter Superfund Site, Dewey-Humboldt, Arizona.*

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

February 25, 2019
FPU 19-163

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 Feasibility Study Strategy Technical Memorandum, December 28, 2018.*

Dear Mr. Dhont:

The Arizona Department of Environmental Quality (ADEQ) and our contractor Matrix Design Group reviewed the above-referenced document. ADEQ comments are presented below:

ADEQ Comments:

- Section 3.3 Waste Considerations. It is indicated that based on the potential preferences of EPA and PRPs, flexibility will be built into the proto and final alternatives. With the assumption that the State of Arizona will ultimately take over the long-term requirements of some site actions once EPA has completed the remedy (i.e., long-term O&M of repository covers), then State preferences should also be considered during alternative development.
- Section 3.8 Community Involvement. Tetra Tech indicates that they will work with EPA to ensure public comment is formally and informally received. They should also be working with State of Arizona agencies as appropriate.
- Section 3.12 Highway 69. Depending on the haul route for wastes removed from Chaparral Gulch and the Blowout Path, local residences and streets could also be impacted by increased traffic and spills of mine waste.
- Table 5-2 Impacted Media to be Addressed – Main Tailings Pile/Former Mineworks and Processing. Include groundwater under the pile until the results of the groundwater sampling are available and integrated into potential site risks.

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- The State of Arizona should receive copies of all the technical memorandums indicated on Figure 6-2 even if they are for information-only.
- There are several EPA/Tetra Tech meetings included on Figure 6-2. Please include the State of Arizona in these meetings to at least listen in on, especially any risk related and PRG discussions.

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 Programs Unit

cc: Mike Gronseth, Matrix Design Group