

From: [John Peterson](#)
To: [Dhont, Jeffrey](#)
Cc: [Mike Gronseth](#); [Karin Harker](#)
Subject: Iron King Mine/Humboldt Smelter - ARARs
Date: Thursday, June 17, 2021 4:43:48 PM
Attachments: [IKHS ADEQ additional arar tbc IKHS 17 June 2021.pdf](#)

Jeff,

ADEQ and our contractor Matrix Design Group, Inc. reviewed the following letter prepared by Jeff Dhont of the U.S. Environmental Protection Agency, Region 9 to Karin Harker of ADEQ:

- *Applicable or Relevant and Appropriate Requirements, Iron King Mine / Humboldt Smelter (IKHS) Superfund Site, June 7, 2021.*

ADEQ's response to the above referenced letter is 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.

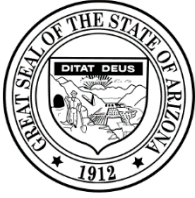
John R. Peterson

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Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

June 17, 2021
FPU 21-307

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

Re: *Applicable or Relevant and Appropriate Requirements
Iron King Mine / Humboldt Smelter (IKHS) Superfund Site*

Dear Mr. Dhont:

This letter is written in response to your letter to Karin Harker of ADEQ, dated June 7, 2021. In that letter you discussed the continuing coordination between EPA and ADEQ on the state of Arizona Applicable or Relevant and Appropriate Requirements (ARARs) that may ultimately be selected for the IKHS Site. ADEQ reviewed Appendix A of the draft FS Report that identified potential state and federal ARARs that EPA is considering in the IKHS remedy selection process. ADEQ did not have any comments on Appendix A but has identified two possible additions to the potential state ARARS list which are presented below:

- The *Arizona Administrative Code Title 11. Mines, Chapter 2. State Mine Inspector, Mined Land Reclamation* should be considered as an Action-Specific ARAR as it outlines state requirements for mine reclamation.
- The *Arizona Mining Guidance Manual BADCT* could be added as TBC based on the requirements for tailings impoundment facilities.

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

Sincerely,

John R. Peterson

John R. Peterson
Project Manager
Federal Projects Unit

cc: Mike Gronseth, Matrix Design Group
Karin Harker, ADEQ

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