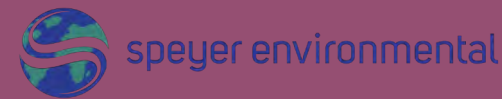


IKMHS SUPERFUND SITE RI/FS | Review & Response

STEPHEN E. SPEYER, PH.D, R.G.
PRINCIPAL SCIENTIST



22703

Agenda



INTRODUCTIONS

MODULE 1 | CERCLA & SUPERFUND | OVERVIEW

MODULE 2 | IKMHS SUPERFUND & EPA PROGRAM

MODULE 3 | IKMHS RI/FS WHAT IS ADEQUATE & WHAT IS NOT

CLOSING COMMENTS | QUESTIONS & ANSWERS



1

**US EPA & CERCLA
OVERVIEW & REVIEW**



WHAT IS EPA'S MISSION...?

THE GOALS OF SUPERFUND

- Protect human health and the environment by cleaning up contaminated sites;
- Make responsible parties pay for cleanup work;
- Involve communities in the Superfund process; and
- Return Superfund sites to productive use.

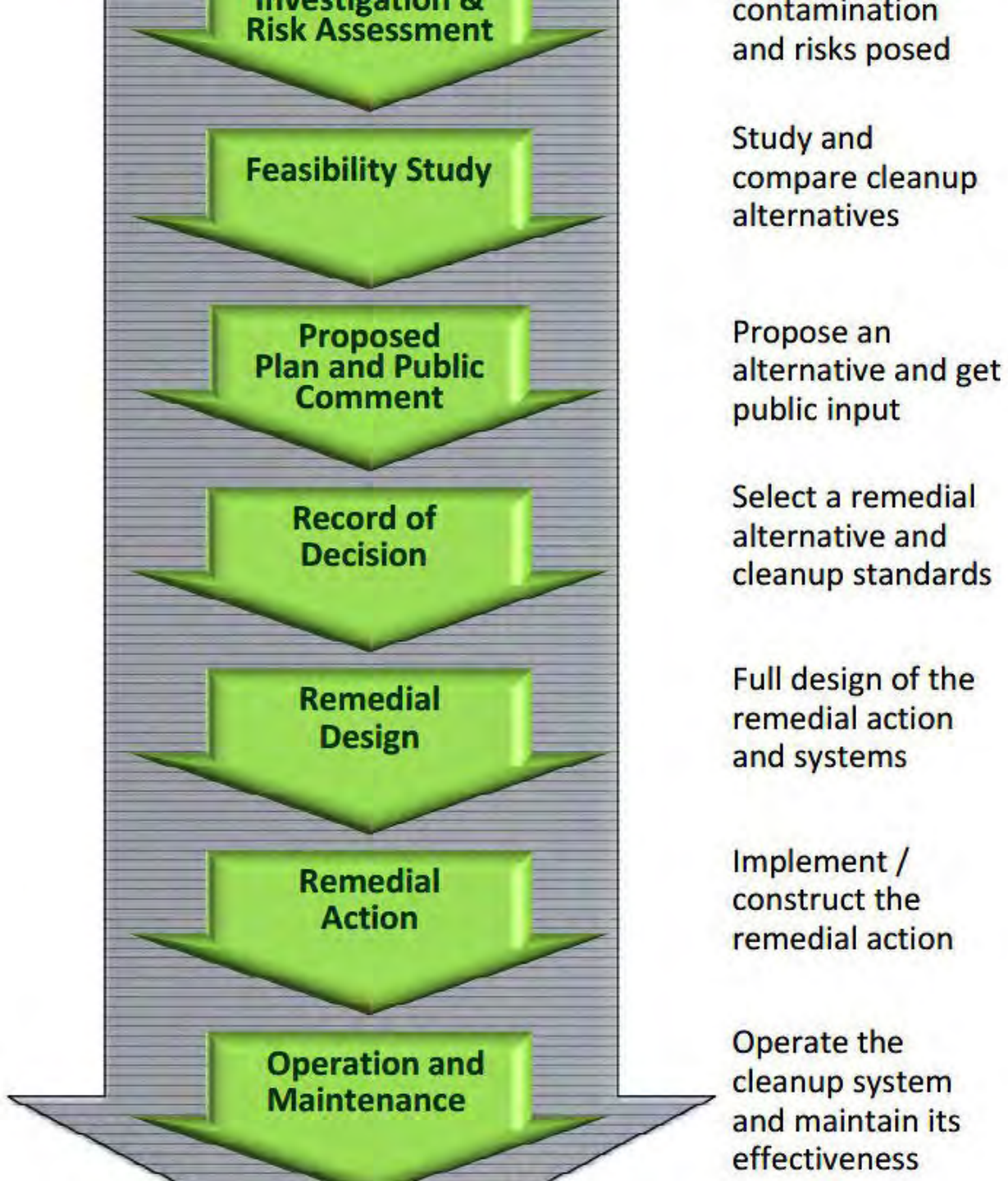




US EPA & CERCLA

COMPREHENSIVE ENVIRONMENTAL RESPONSE,
COMPENSATION & LIABILITIES ACT

COMPREHENSIVE
ENVIRONMENTAL
RESPONSE
COMPENSATION
LIABILITY



cERCLA...

ENVIRONMENTAL

- EPA addresses the distribution of contaminants in environmental media as a matter of calculated risk.
- The concentration of contaminants is measured in the environmental and levels that exceed statutory or calculated threshold values are addressed.
- EPA addresses possible impacts to health only, not actual health impacts.
- EPA does NOT address the long-term impact of these contaminants on a community or an individual.

RESPONSE

- EPA responds to a measured level of contamination that exceeds or might exceed a level of risk that is calibrated as “screening” or “threshold” based on sample data.
- The risk directs the extent of cleanup as a preventative measure.
- EPA responded to high concentrations of Arsenic and Lead in residential soils (2011) and restored the affected properties following the removal action (2012).
- EPA conducted an additional time-critical removal assessment of residential properties in 2013, but there has been no reported removal action following sampling.



How does EPA Benefit the Town...?



- 1) COMPLETED A SIGNIFICANT AMOUNT OF SAMPLING & ANALYSIS.
- 2) IDENTIFIED THE DISTRIBUTION OF CONTAMINATION.
- 3) HAS THE FUNDING TO REMOVE THE CONTAMINATION FROM PUBLIC EXPOSURE.
- 4) IS AVAILABLE TO DISCUSS COMPLETED & PLANNED WORK WITH THE TOWN'S CONSULTANT.

2

US EPA | IKMHS SUPERFUND

**REMEDIAL INVESTIGATION &
FEASIBILITY STUDY REPORTS**

SUMMARY & REVIEW



Status Report

(February 14, 2023)

WHAT I HAVE COMPLETED

- 1) Overview of Remedial Investigation (RI) & Feasibility Study (FS)
- 2) Air Samples & Data Analysis
- 3) Soil Sampling & Data Analysis
- 4) Review of Remedial Options

WHAT I AM WORKING ON

- 1) Groundwater Sampling & Data Analysis
- 2) Sediment & Surface Water Analysis
- 3) Detailed Analysis of Remedial Options

CERCLA is Focused on Environmental Media

AIR

EPA conducted a year-long monitoring of air based on wind patterns and proximity to mine tailings, dross, and smelter slag.



SOIL

EPA collected and analyzed 9,478 soil samples from the Superfund Site and 269 soil samples from outside the Site boundary.



SEDIMENT & SURFACE WATER

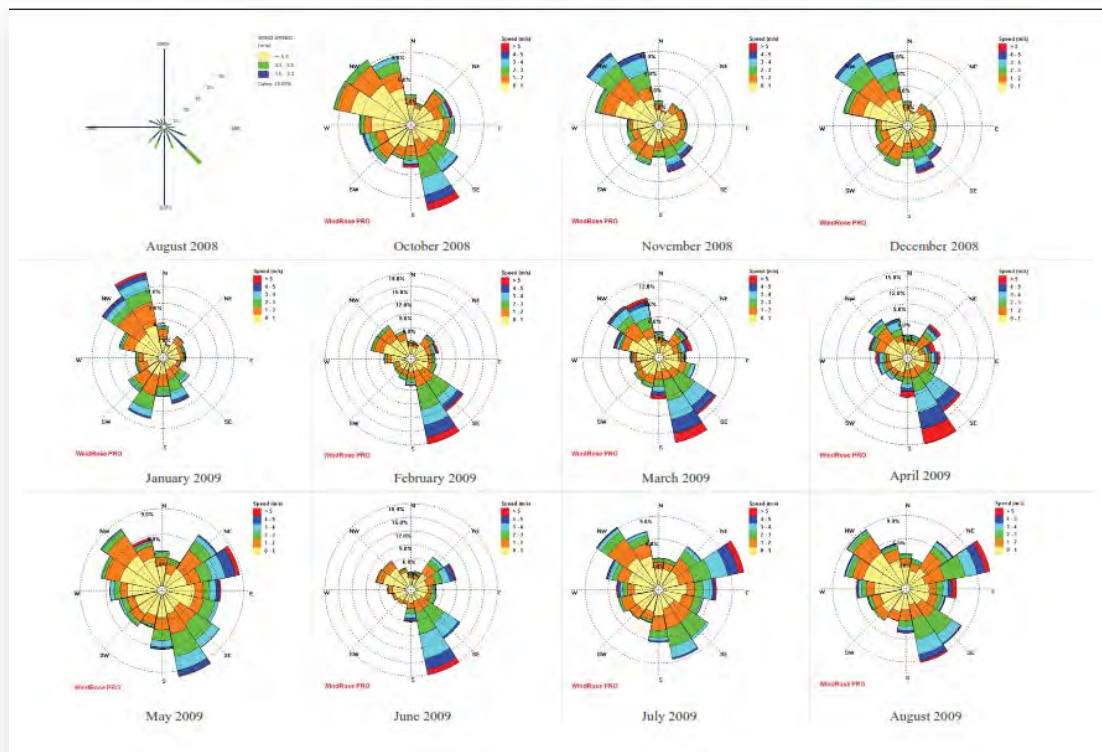
EPA collected and analyzed sediment and water samples from Galena Gulch, Chaparral Gulch, and Agua Fria River



GROUNDWATER

EPA collected and analyzed 339 groundwater samples from existing water supply wells and 26 monitoring wells.

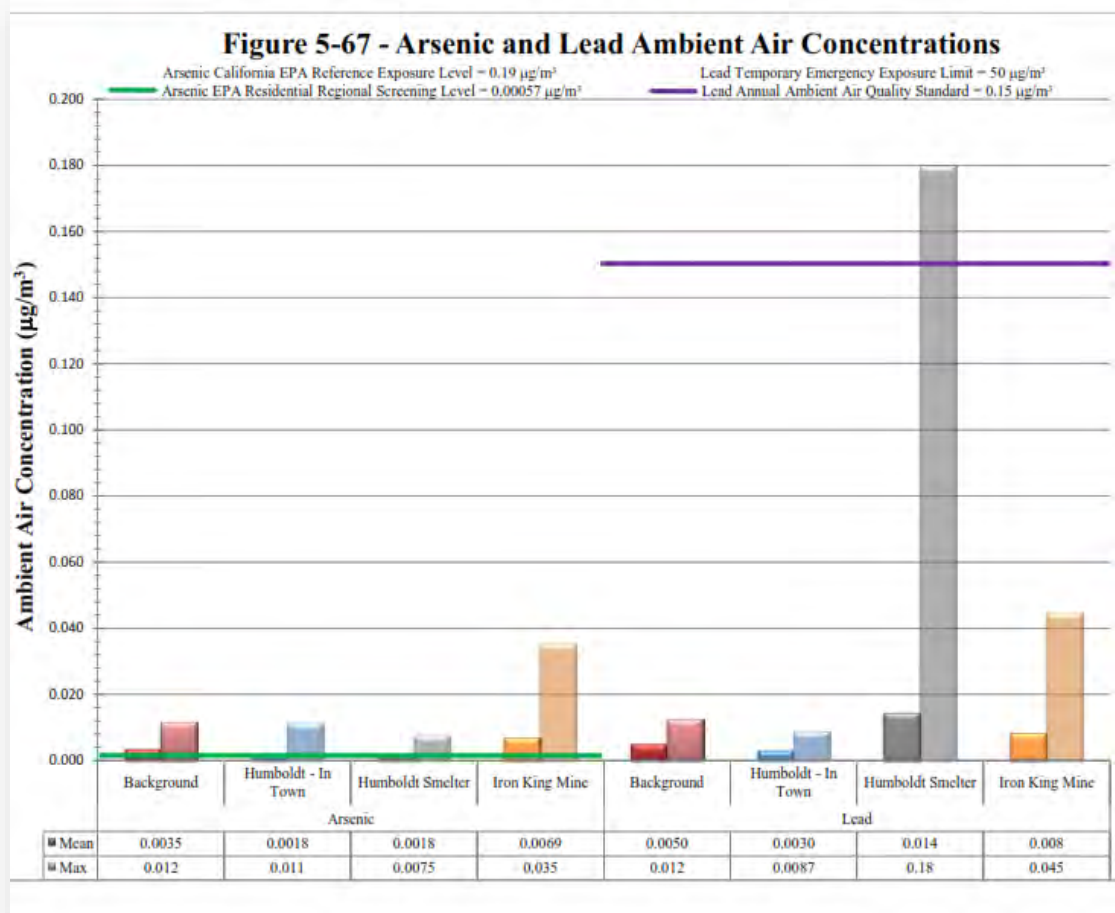
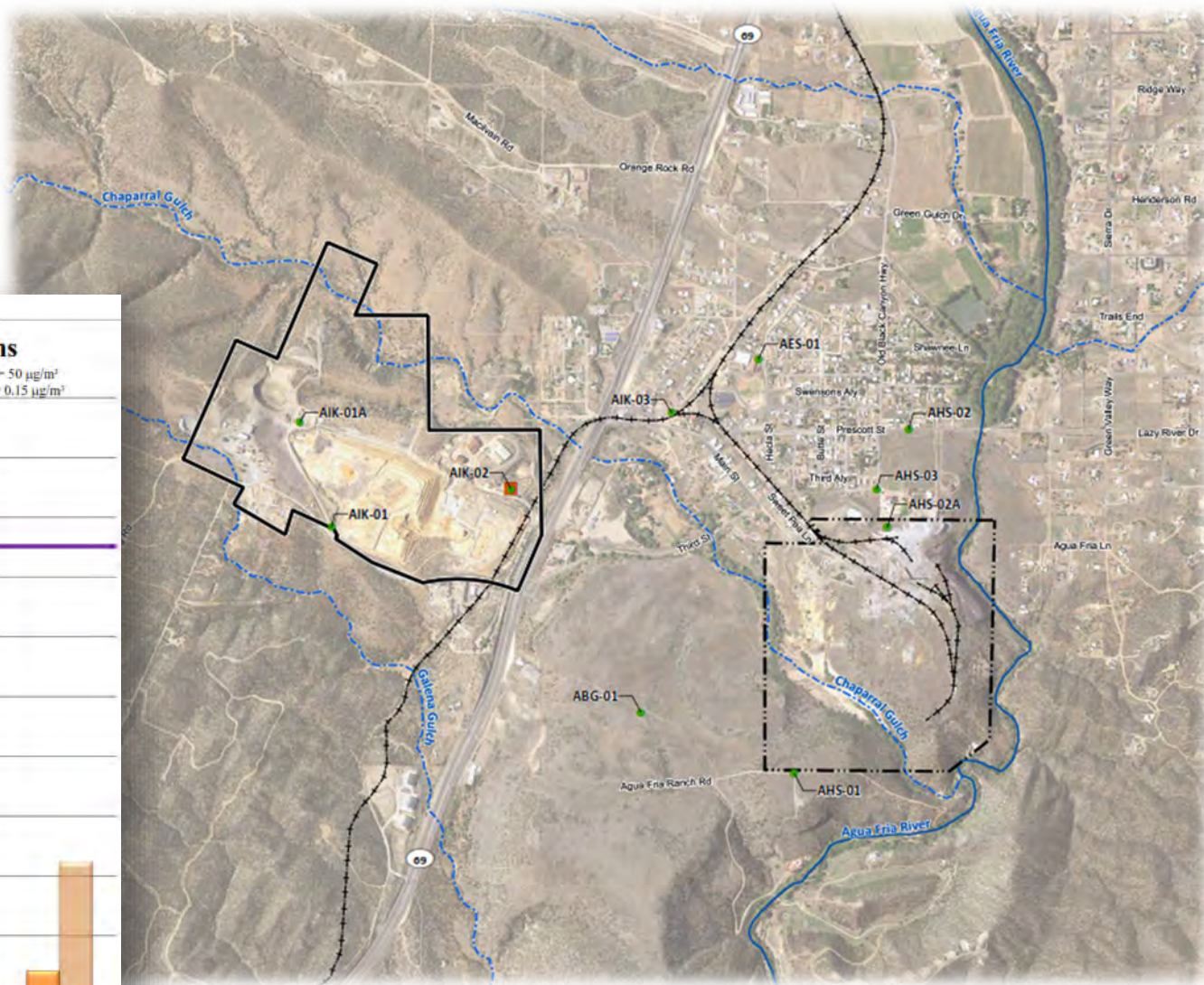
AMBIENT AIR SAMPLING



WIND DIRECTION & STRENGTH

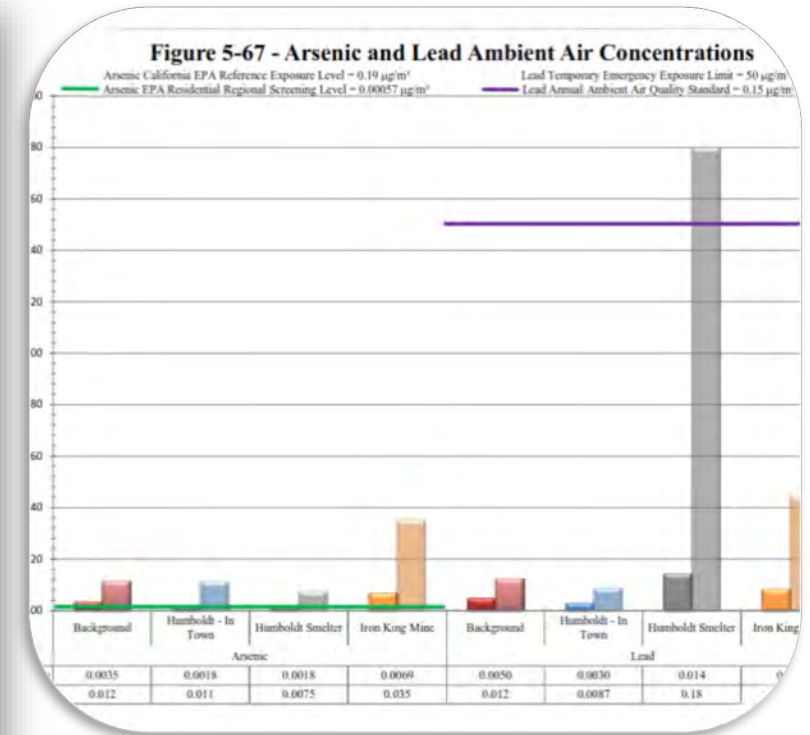
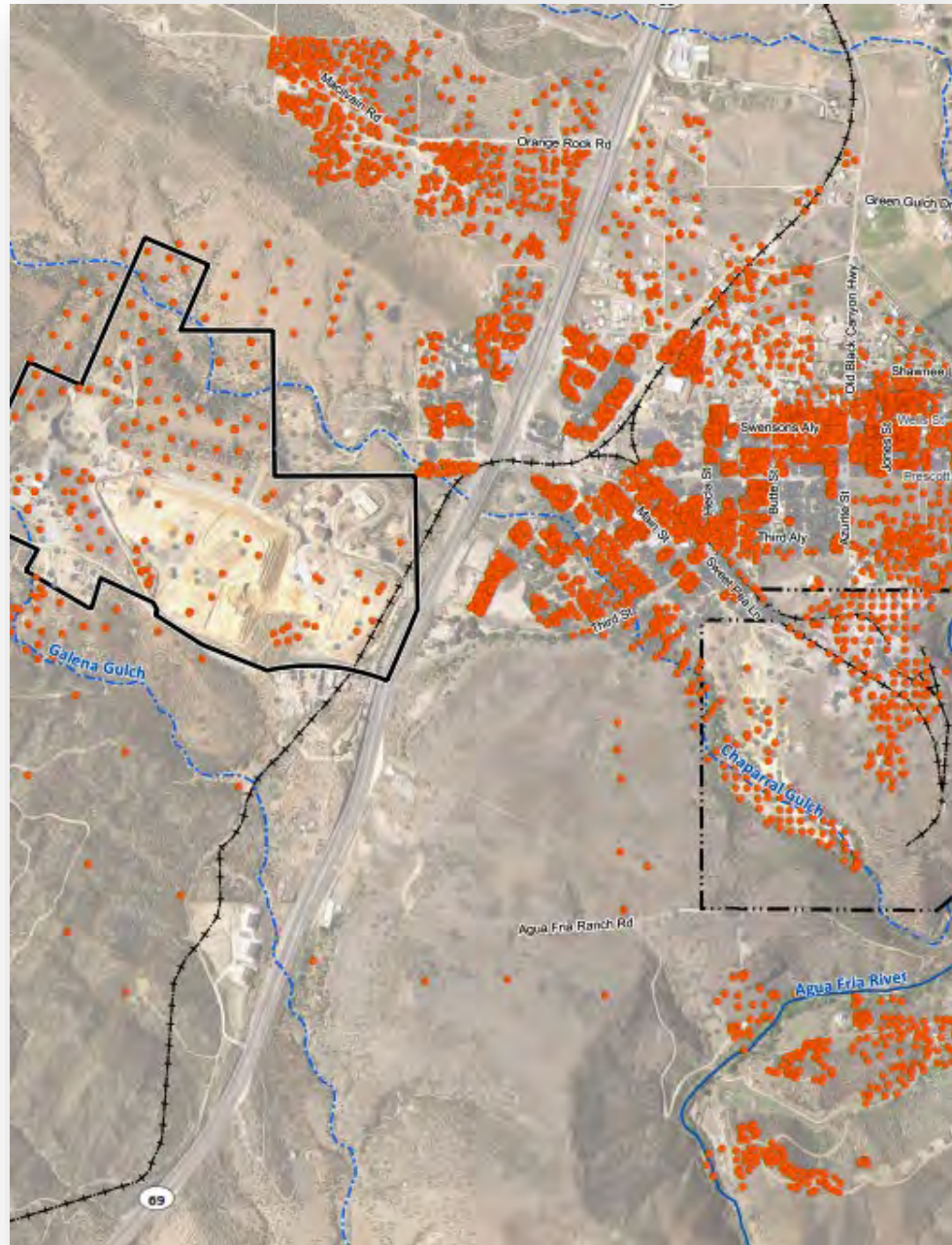
- 1) The direction of prevailing winds guides the placement of air monitoring devices.
- 2) EPA collected wind direction data for a 1-year period (8/2008 – 8/2009)
- 3) Air samplers were placed at the IKM & HS and in the Town of Humboldt.
- 4) Control samplers were placed off-site in order to record “Background” data.
- 5) Exposure due to Fugitive Dust is related to metals, including Arsenic & Lead

Arsenic & Lead in Ambient Air Samples



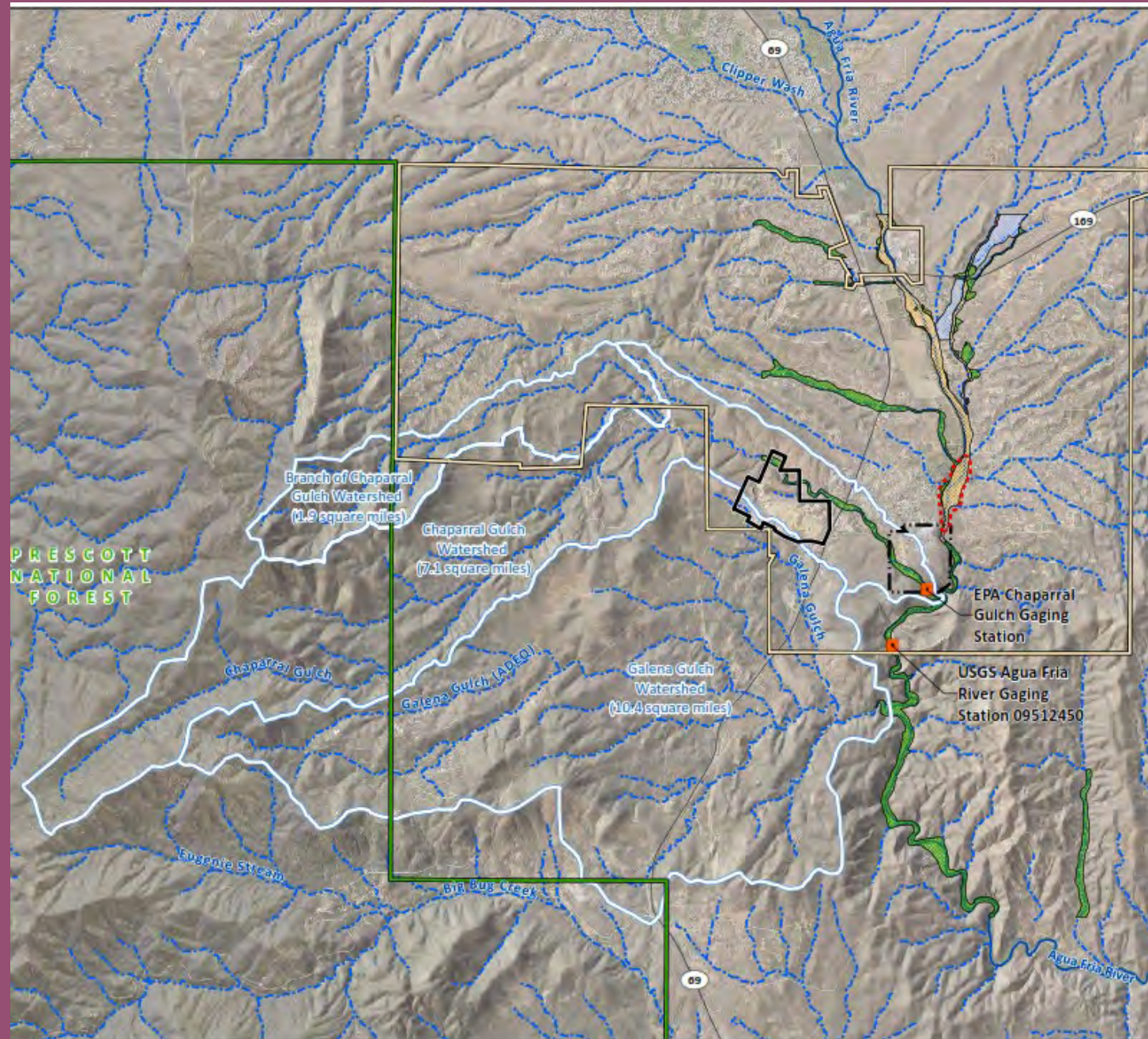
Data collected by EPA | 8/17/2008 – 9/8/2009 | Min & Max Values

Ambient Air Impact Assessment

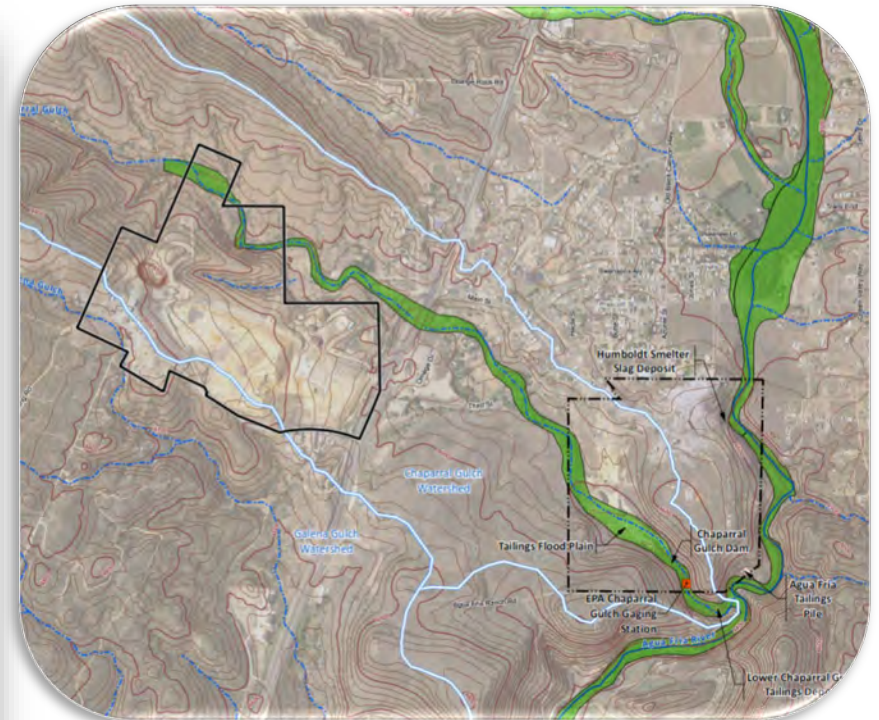
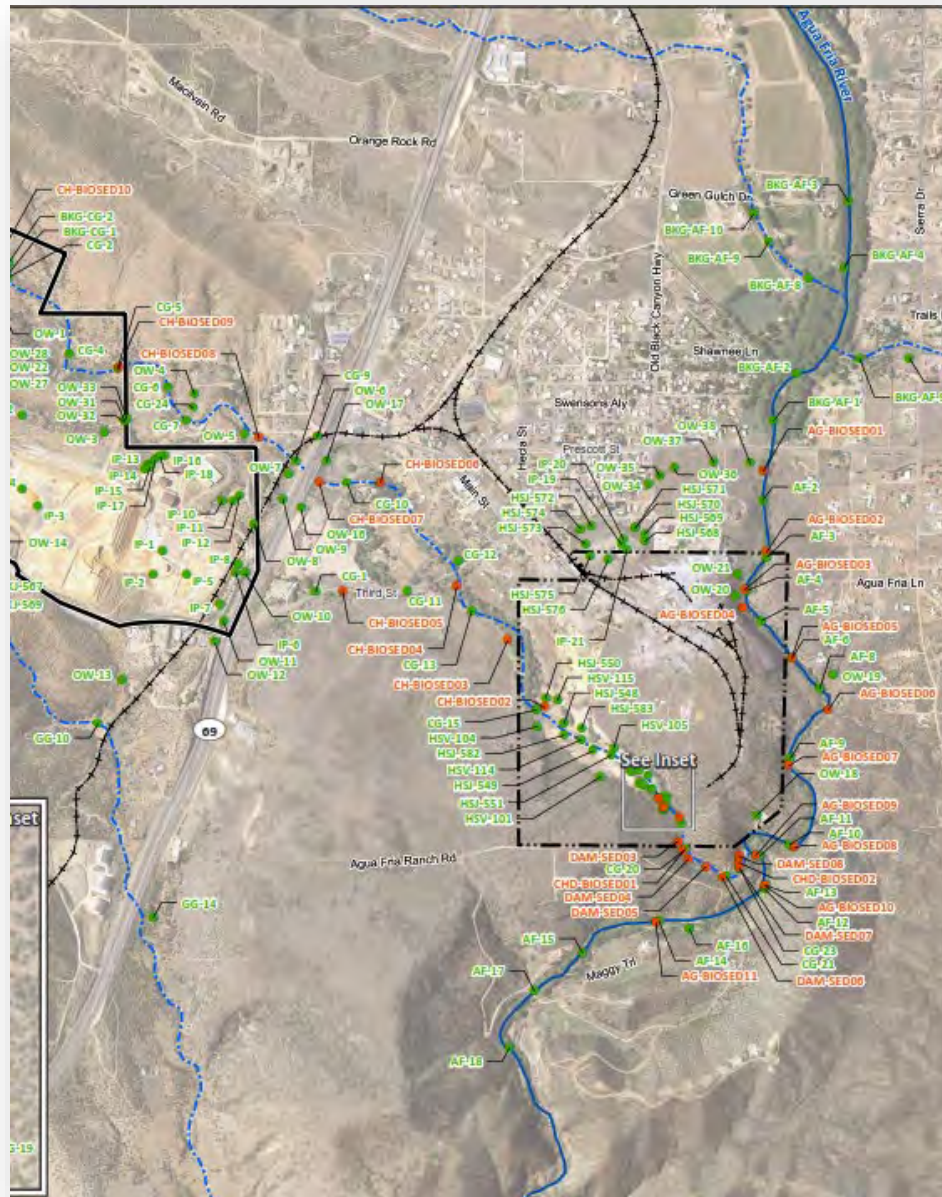


Sediment & Surface Water

WATERSHEDS IN THE VICINITY OF DEWEY-HUMBOLDT

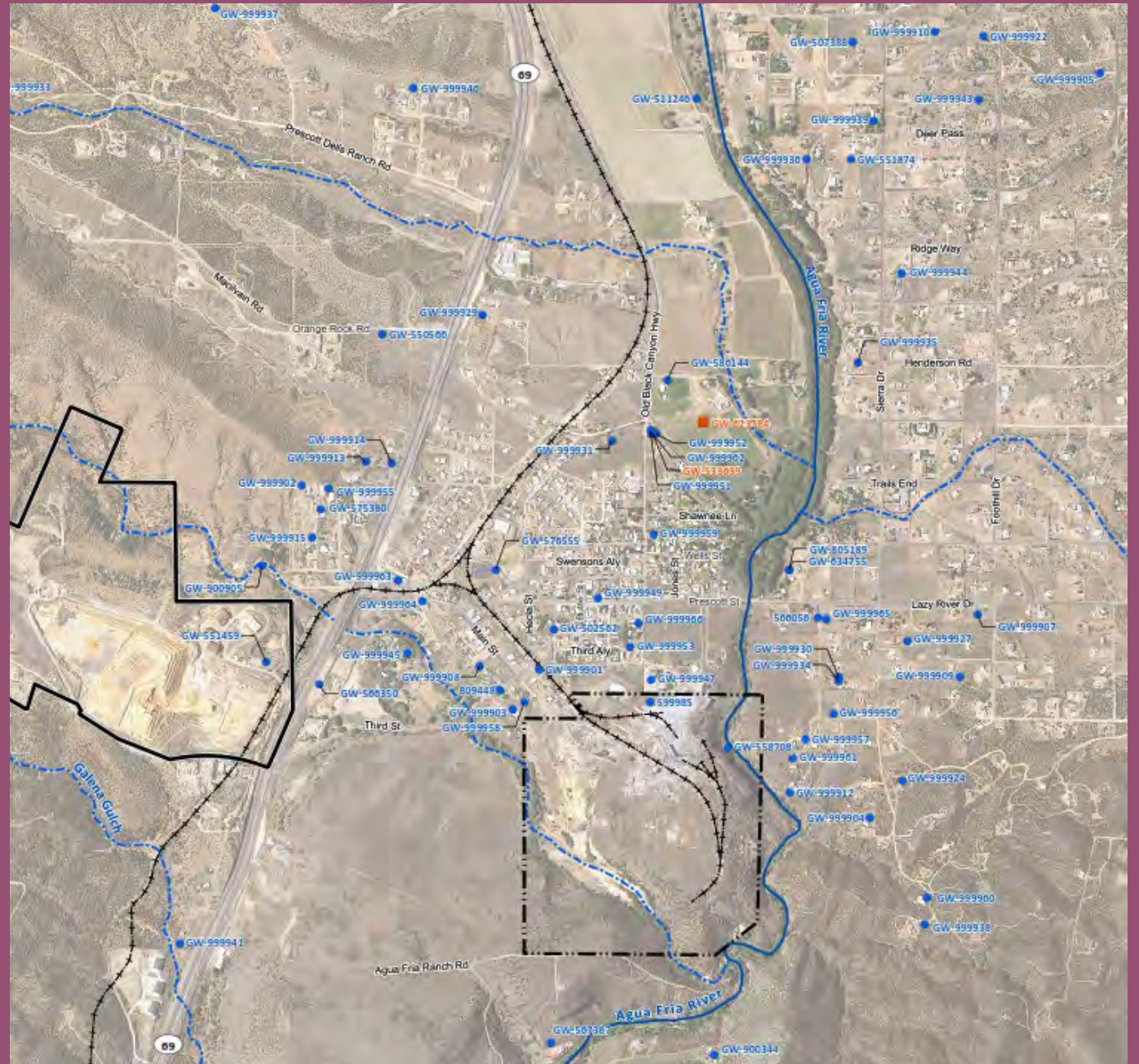


Surface Water & Sediment Samples



Groundwater

Existing Production Wells,
Drinking Water Wells, EPA
Monitoring Wells



Soil Sampling & Analysis

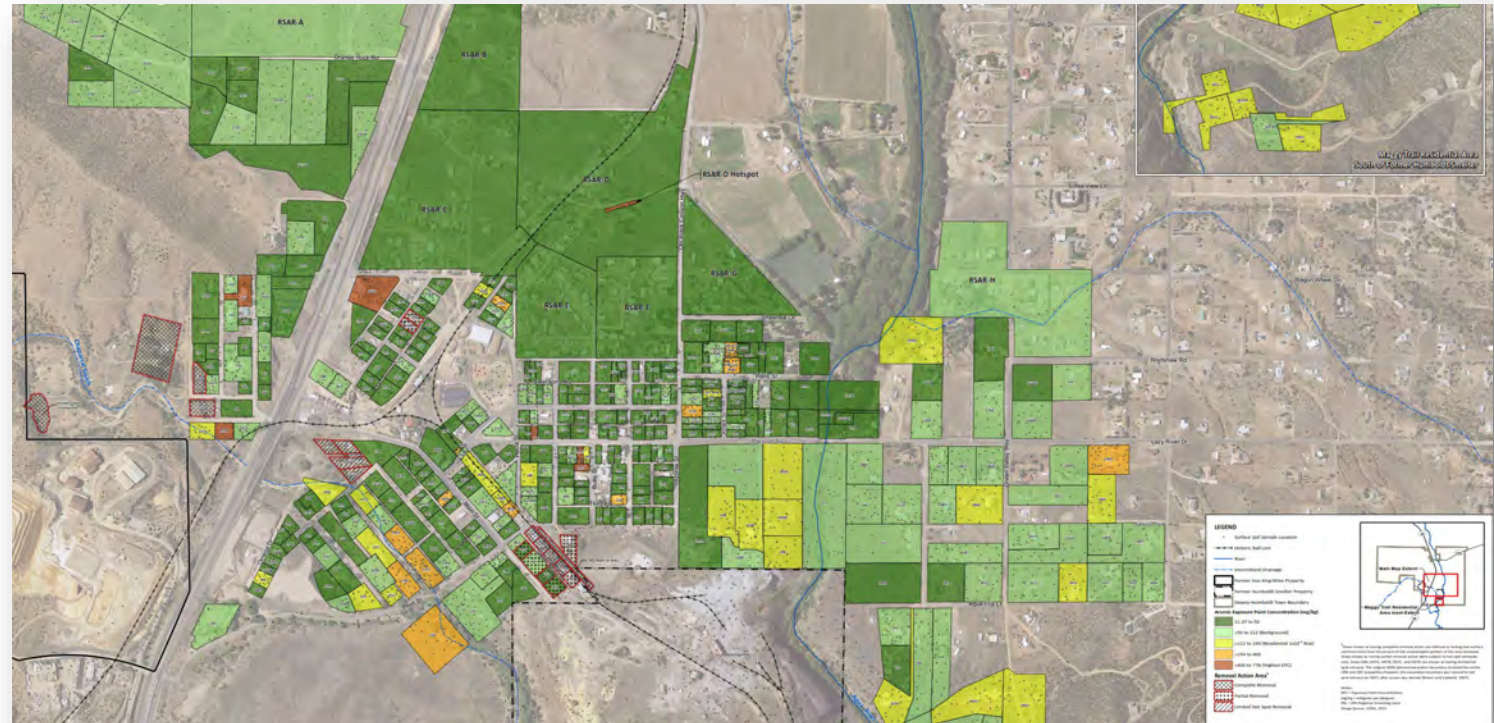
IKMHS SUPERFUND CHEMICALS OF CONCERN | SOIL

The RI/FS identified several contaminants in the Study Area, including Metals, PCBs, Pesticides, PAHs, and Cyanide.

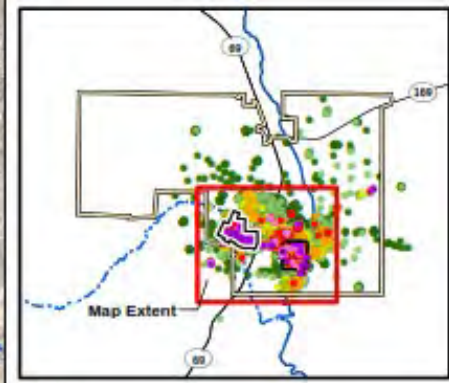
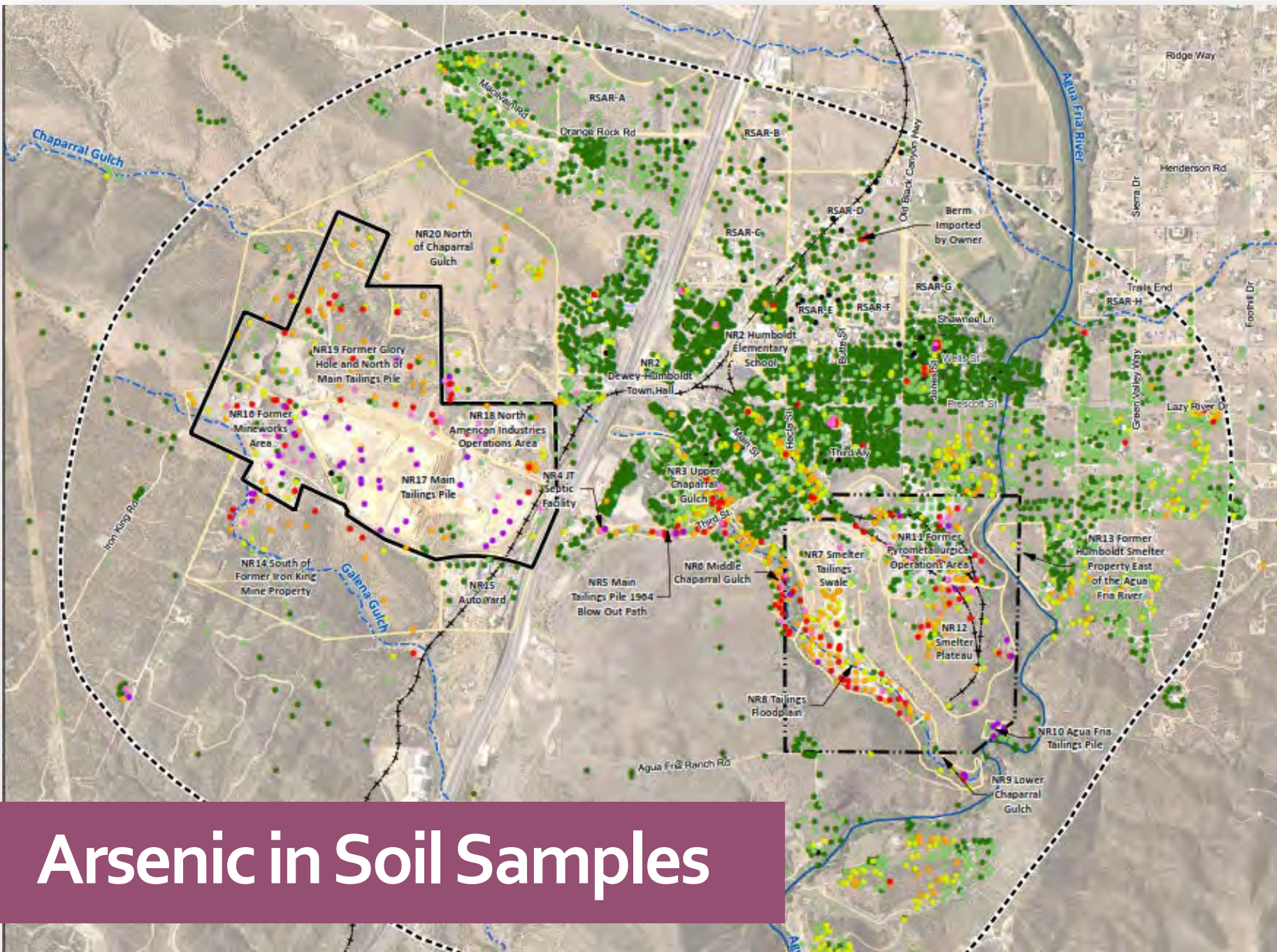
Arsenic and Lead were identified as Primary Chemicals of Interest (or Chemicals of Concern).

The distribution of COCs at the Superfund Site consists of co-occurring groups of chemicals.

Arsenic occurs in all media and remediation work regarding Arsenic will result in removal of other COCs.



Arsenic in Soil Samples



LEGEND

Arsenic Concentration in Surface Soil (mg/kg)

- Not Detected
- 1.6 (Lowest Detection) to 50
- >50 to 112 (Background)
- >112 to 194 (Screening Level)
- >194 to 400
- >400 to 800
- >800 to 1,000
- 1,600 to 20,200 (Highest Detection)

- Historic Rail Line
- River
- Intermittent Drainage
- Exposure Area
- ▭ Former Iron King Mine Property
- ▭ Former Humboldt Smelter Property
- ▭ Area of Potential Site Impact
- ▭ Dewey-Humboldt Town Boundary

Scale in Feet: 0, 1,200, 2,400

Notes:
 Surface soil samples have a beginning depth less than or equal to 2 feet below ground surface. At locations where multiple samples were collected at less than or equal to 2 feet below ground surface, the symbolized concentration represents the maximum result. Screening levels were used solely to evaluate the nature and extent of contamination; they are not intended to infer the existence of unacceptable risk.
 NR3 Upper Chaparral Gulch, designated as a non-residential (possible future residential) area, overlaps an area designated as RYSK.
 Image Source: USDA, 2015.



Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
36W-025-1	0 to 2 inches	1,900	372
36W-025-2	10 to 14 inches	30 U	35 U
36W-025-3	22 to 26 inches	30 U	35 U
36W-025-4	34 to 38 inches	30 U	35 U

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
36W-025-1	0 to 2 inches	938	279
36W-025-2	10 to 14 inches	30 U	35 U
36W-025-3	22 to 26 inches	30 U	35 U
36W-025-4	34 to 38 inches	30 U	35 U

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
36W-020-1	0 to 2 inches	2,093	654
36W-020-2	10 to 14 inches	30 U	35 U
36W-020-3	22 to 26 inches	30 U	35 U
36W-020-4	34 to 38 inches	66	43

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
36W-015-1	0 to 2 inches	1,180	299
36W-015-2	10 to 14 inches	31	35 U
36W-015-3	22 to 26 inches	30 U	35 U
36W-015-4	34 to 38 inches	30 U	35 U

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
30W-021-1	0 to 2 inches	1,163	240
30W-021-2	10 to 14 inches	84	54
30W-021-3	22 to 26 inches	89	35 U
30W-021-4	34 to 38 inches	30 U	35 U

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
36W-026-1	0 to 2 inches	1,135	366
36W-026-2	10 to 14 inches	30 U	35 U
36W-026-3	22 to 26 inches	30 U	35 U
36W-026-4	34 to 38 inches	30 U	35 U

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
30W-024-1	0 to 2 inches	617	231
30W-024-2	10 to 14 inches	145	443
30W-024-3	22 to 26 inches	33	35 U
30W-024-4	34 to 38 inches	30 U	35 U

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
36W-017-1	0 to 2 inches	1,305	396
36W-017-2	10 to 14 inches	30 U	35 U
36W-017-3	22 to 26 inches	30 U	35 U
36W-017-4	34 to 38 inches	30 U	35 U

Sample Number	Depth	Lead (mg/kg) Concentration	Arsenic (mg/kg) Concentration
30W-020-1	0 to 2 inches	540	210
30W-020-2	10 to 14 inches	495	371
30W-020-3	22 to 26 inches	1,123	303
30W-020-4	34 to 38 inches	223	663



Chemicals of Interest (COIs)

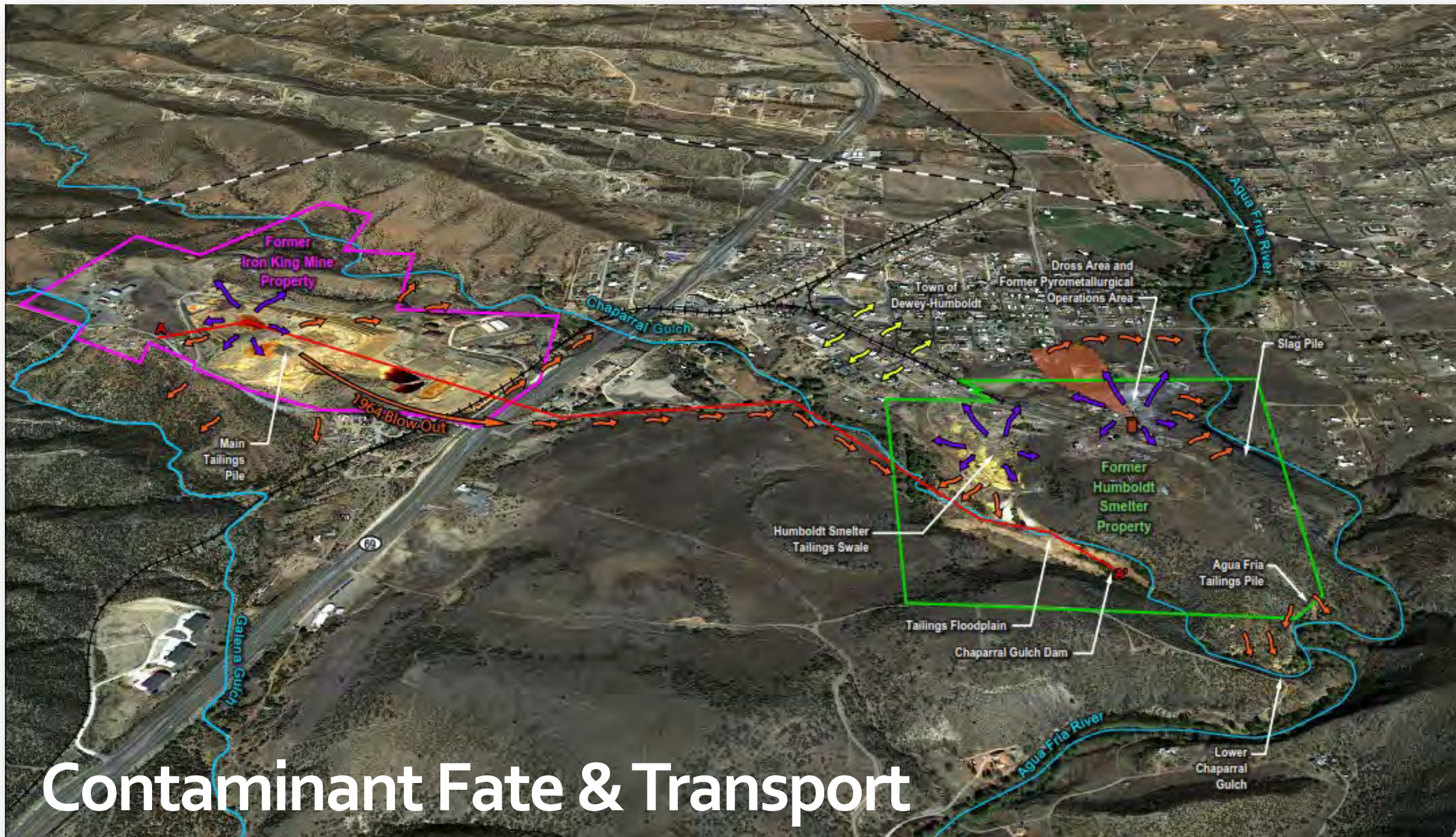
PRIMARY CHEMICALS OF INTEREST | CH2M (2016)

ENV MEDIUM	AIR	SOIL	SURFACE WATER	SEDIMENT	GROUNDWATER
ANALYTE					
ARSENIC	X	X	X	X	X
COPPER			X	X	
IRON			X		
LEAD		X	X	X	X
MERCURY				X	
ZINC			X	X	
NTRATE					X
SULFATE					X
TDS					X

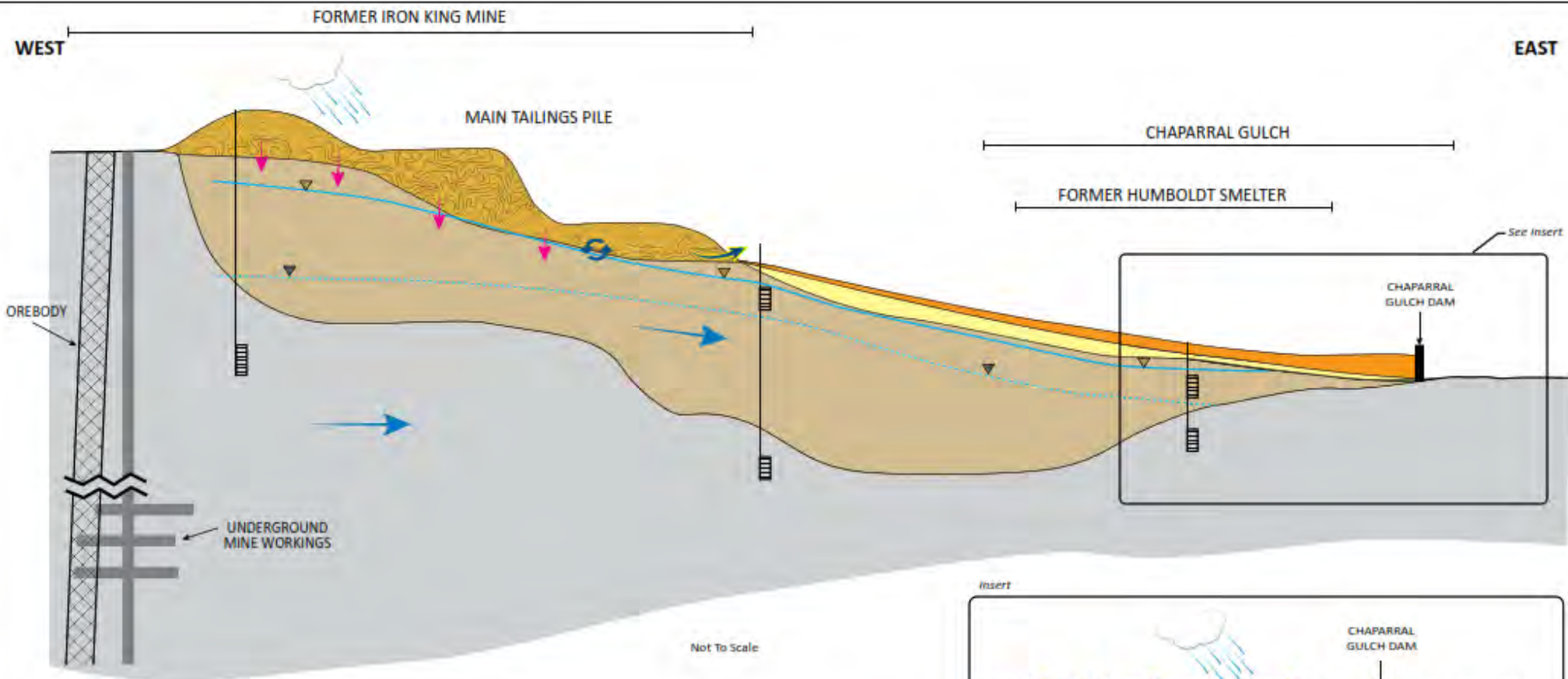
According to the RI, COIs are based on:

- Frequency of detection above screening levels.
- Maximum concentrations relative to screening levels.
- Distribution at the former Iron King Mine and Humboldt Smelter properties and adjacent areas.





Contaminant Fate & Transport



LEGEND

- Tailings
- Tailings and Tailings-Alluvium Mixtures
- Quaternary Alluvium
- Tertiary Hickey Formation
- Precambrian Bedrock
- Piezometric Surface (Tailings - Alluvium Mixture in Chaparral Gulch)
- Piezometric Surface (Hickey)
- Piezometric Surface (Precambrian)
- Regional groundwater flow direction
- Rainfall, percolation, generation of acid rock drainage (ARD), and leaching of metals
- Releases to surface water by erosion, runoff, and groundwater seepage
- Geochemical transformation by dissolution, precipitation, and adsorption reactions
- Well Screen

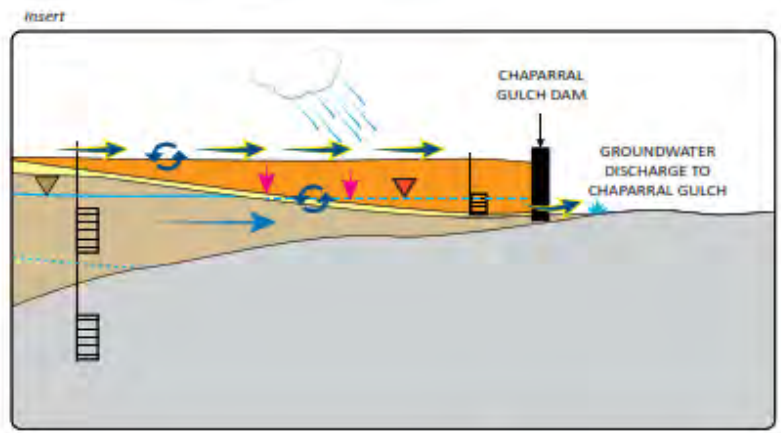


Figure 8-9
Conceptual Site Model Cross Section
 Iron King Mine – Humboldt Smelter Superfund Site
 Dewey-Humboldt, Yavapai County, Arizona

COI	US EPA SCREENING LEVEL THRESHOLDS (NOVEMBER 2022)							
	CANCER RISK (1 x 10 ⁻⁶)				HAZARD INDEX (HS = 1.0)			
	INGESTION	DERMAL	INHALATION	CARCINOGENIC	INGESTION	DERMAL	INHALATION	NON-CARCINOGENIC
ARSENIC	0.77	5.5	890	0.68	39	330	21,000	35
LEAD	NA	NA	NA	NA	NS	NS	NS	400
NOTE: All threshold concentrations are reported in milligrams per Kilogram (mg/Kg) [ppm].								
NA	NOT APPLICABLE			NS	NOT SPECIFIED			

Cleanup Target Values

FEDERAL REQUIREMENTS

- 1) Screening Levels | November 2022
- 2) Drinking Water Standards | Federal Safe Drinking Water Act | 1974 (MCLs)
- 3) Risk Assessment Guidance for Superfund (RAGS) | 1989 to 2022
- 4) Exposure Point Concentrations (EPCs) | Preliminary Remediation Goals (PRGs)

APPROPRIATE OR RELEVANT APPLICABLE REQUIREMENTS

- 1) Arizona State Statutes & Rules | ARS & AAC
- 2) Soil Remediation Levels (SRLs) | 2009
- 3) Aquifer Water Quality Standards (AWQS) | Drinking Water Standards (DWS) | Follow Federal SDWA
- 4) AAC includes Provisions for Site-Specific Remediation Goals

Background Threshold Values

The Town of Dewey-Humboldt is located in a mineralized area where metals are expected to naturally exist. For most metals at the IKMHS Site, EPA has adopted the corresponding statutory clean-up concentration. **Arsenic and Lead are exceptions.**

COI	SOIL REMEDIATION LEVEL (SRL)		EPA SUPERFUND / CERCLA / IKMHS CLEANUP CRITERIA					
	EPA (2022)	ADEQ (2009)	EA	EA	E & E	LM SERA	CH2M	Tetra Tech**
			2010	2011	2012	2013	2016	2022
ARSENIC	0.68	10	48	38	38	150	112	92
LEAD	400	400	44	23	23	300	400 (140)*	Varies***

NOTE: All threshold concentrations are reported in milligrams per Kilogram (mg/Kg) [ppm].

* Provisional Screening Level for Lead (Pb) (Not promulgated by EPA / under review)

** Preliminary Remediation Goals vary according to Remedial Group identified by Feasibility Study.

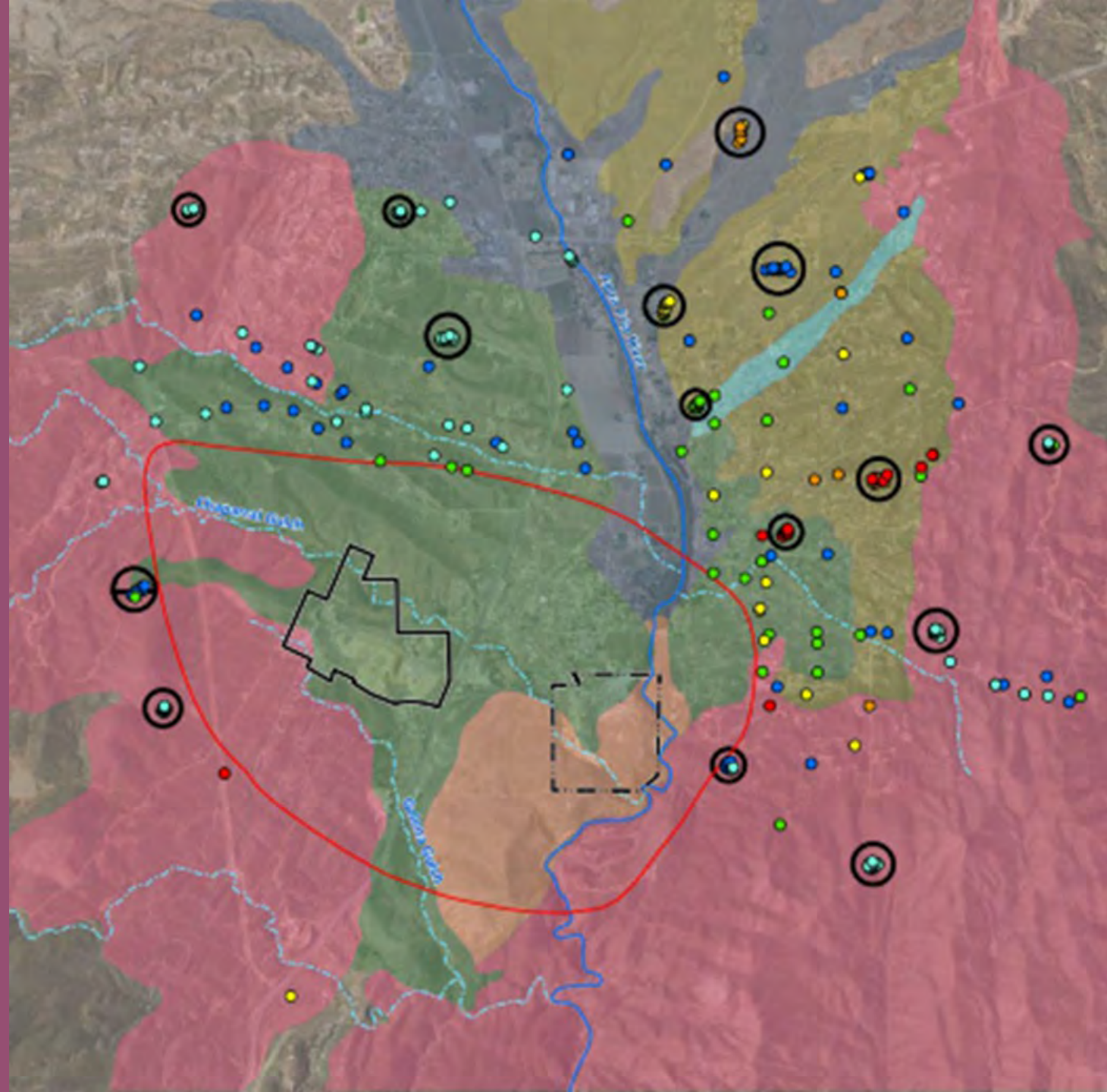
*** Tetra Tech (FS) applied an Integrated Exposure Uptake Biokinetic Model (EPA, 2009) to calculate Lead PRGs.

BACKGROUND THRESHOLD LEVEL (BTL) APPLIED IN RESIDENTIAL SETTINGS.



Distribution of Background Soil Samples

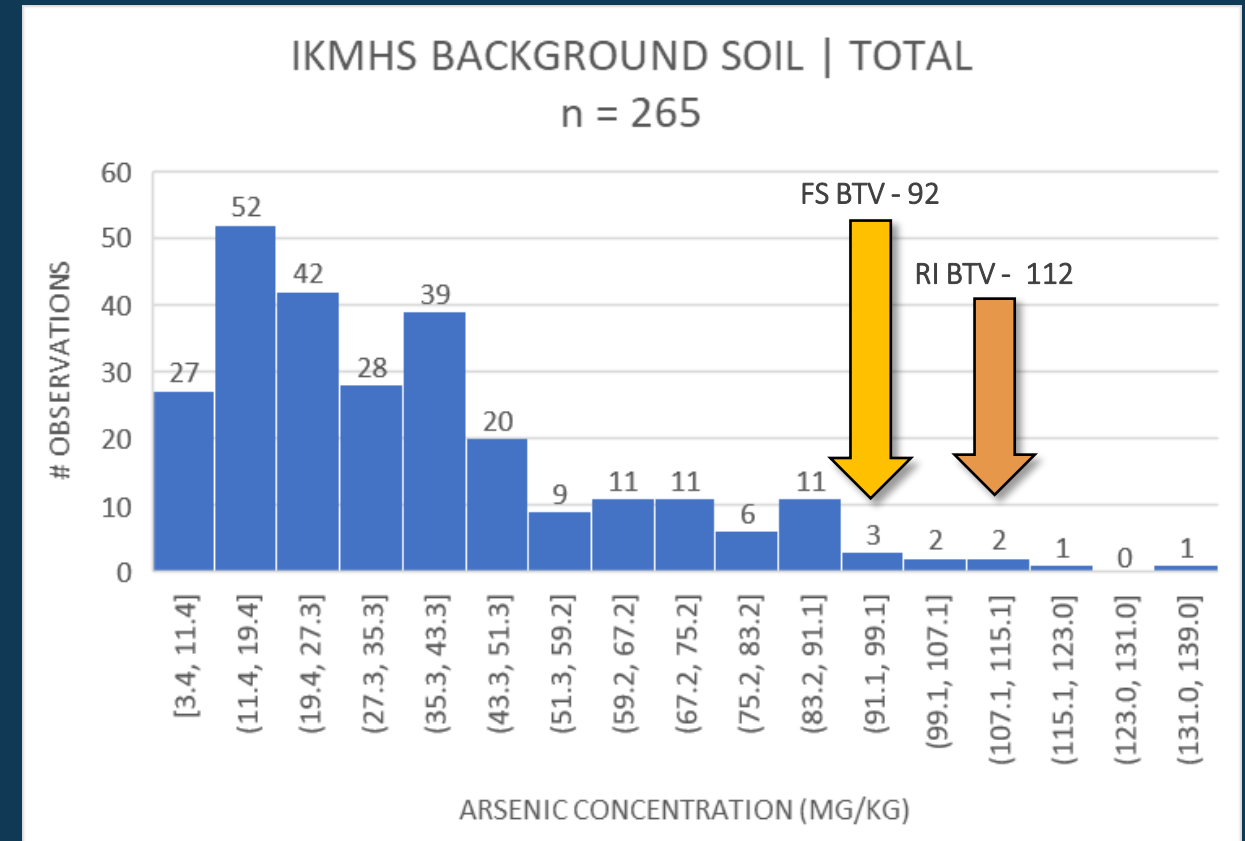
These Data are used to calculate a Background Threshold Value (BTV)

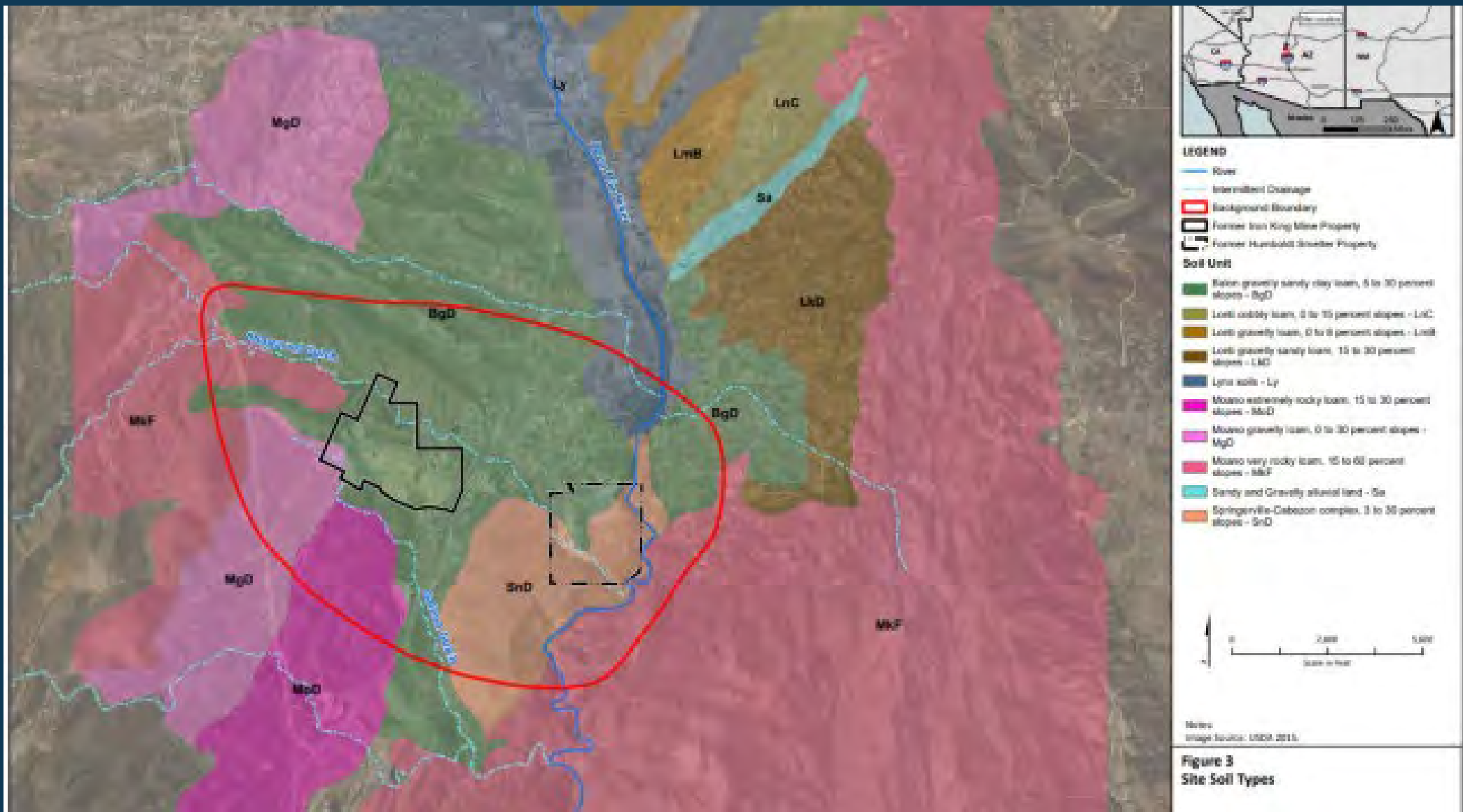


EPA Analysis of Background Concentrations of Arsenic

EPA (Tetra Tech) | BTV Analysis

- 1) TOTAL OF 269 DATA
- 2) ARSENIC DATA GROUPED ACCORDING TO SOIL TYPE
- 3) SOIL TYPE WAS IGNORED BY FS
- 4) 4 DATA – EXTREME OUTLIERS (REMOVED FROM STUDY)
- 5) TOTAL 8 DATA – OUTLIERS ACCORDING TO EPA GUIDANCE DOCUMENTS (FS IGNORES 4 OF THESE 8)
- 6) VORONOI TESSELLATION – WEIGHTED DATA BASED ON SAMPLE PER AREA
- 7) NONPARAMETRIC STATISTICAL ANALYSIS TO DERIVE BTV
- 8) FS BTV DOES NOT ADEQUATELY CHARACTERIZE BACKGROUND ARSENIC CONCENTRATIONS WITH RESPECT TO IKMHS SUPERFUND SITE

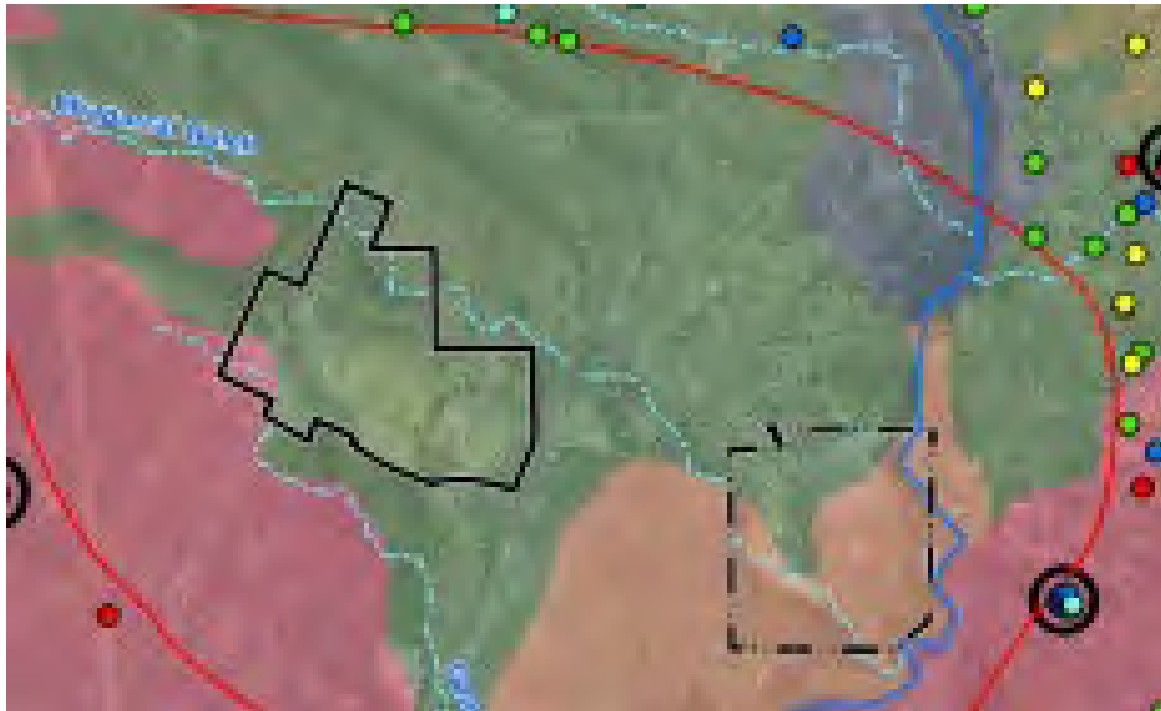




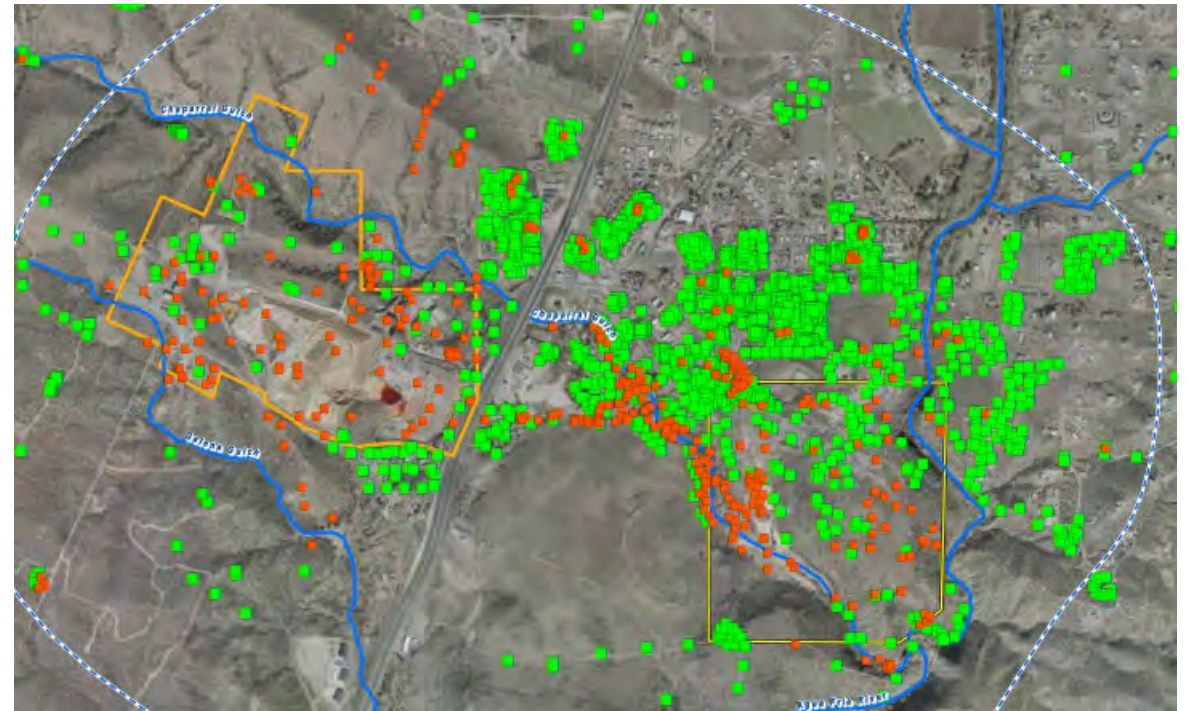
Dewey-Humboldt Area Soil Types

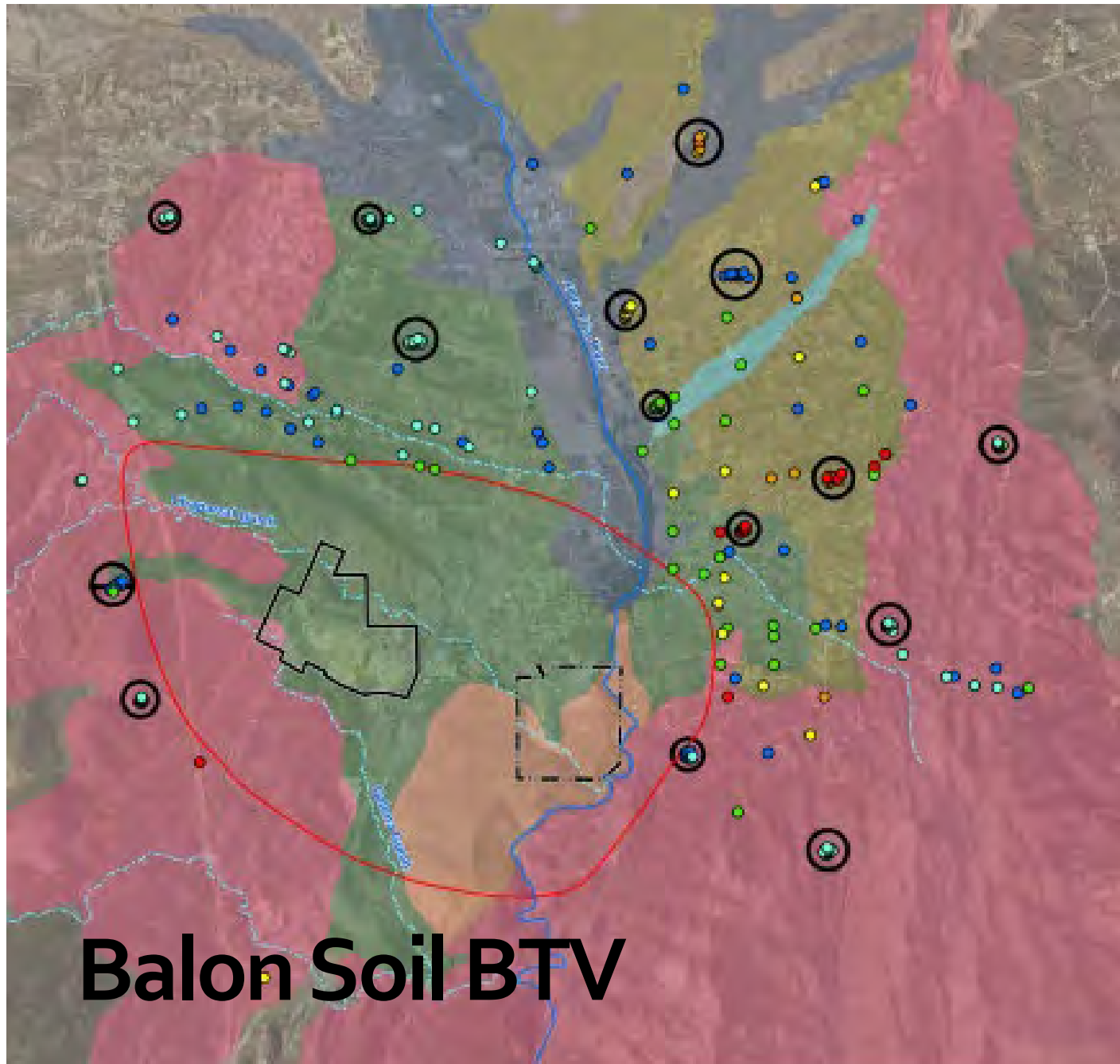
Background Concentration of Arsenic in Soils

Residential Area of the Superfund Site is Balon Type Soil (Green)

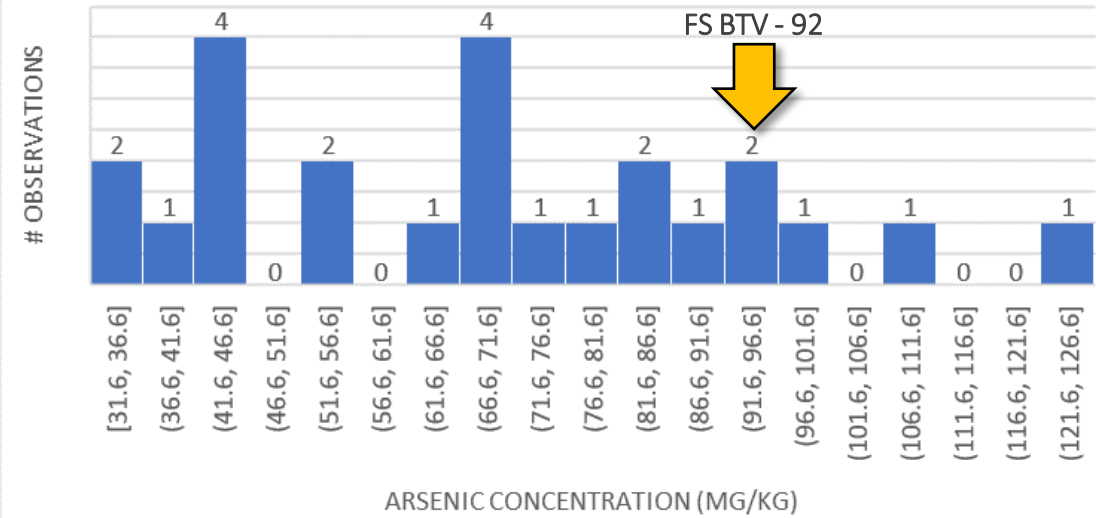


Green vs Red Data are based on a BTV of 112 mg/Kg (RI)

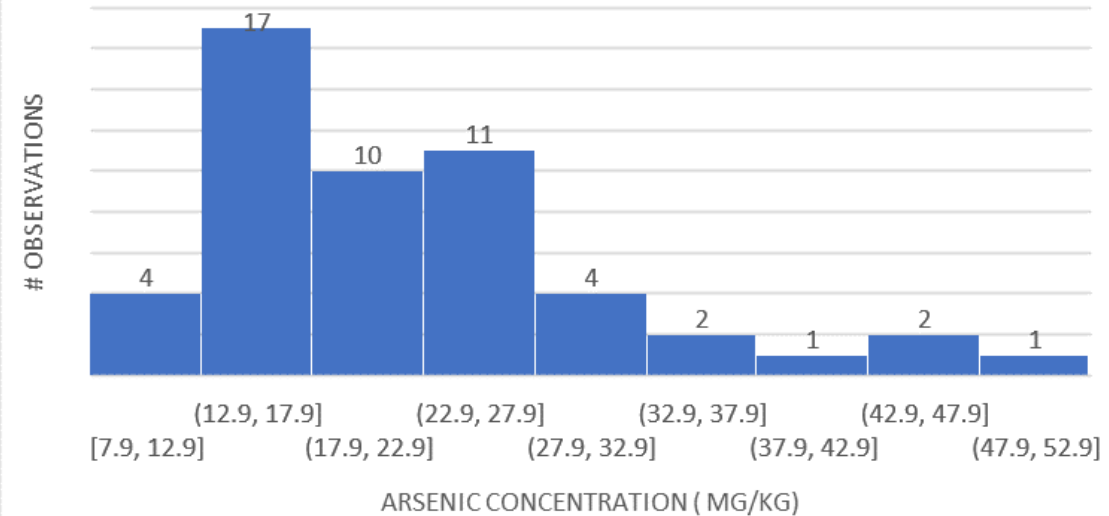




BACKGROUND SOIL DATA | BALON SOIL EAST OF AGUA FRIA RIVER



BACKGROUND SOIL DATA | BALON SOIL WEST OF AGUA FRIA RIVER



Background Threshold Value

ASSESSMENT OF TETRA TECH'S DETERMINATION OF AN ARSENIC BTV

Eliminate ALL Outliers

Eliminate ALL outliers, including those dictated by EPA guidance documents.

Apply Soil Type Data

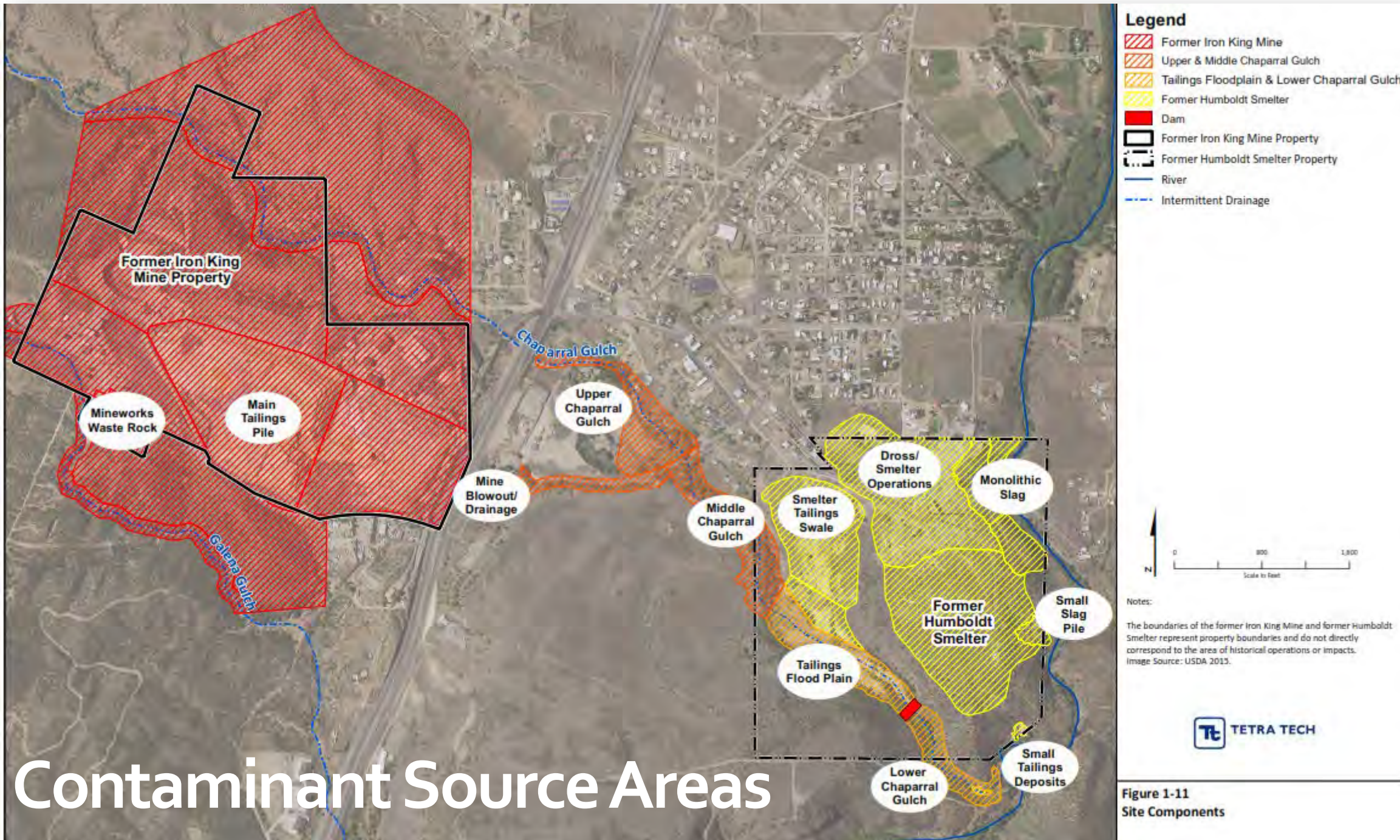
Develop BTVs based on SOIL TYPE.
For example, most residential parcels are characterized as Balon Soil.

West of Agua Fria River

Remove ALL sample data locations "East of Agua Fria River" from consideration. These are outside the area of interest and appear to impose biasing effects.

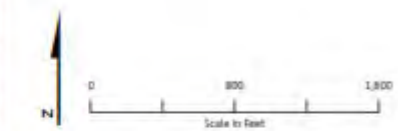
Avoid Complex Statistics

Do NOT apply complex statistics where summary statistics provide adequate guidance.
Check for direct and indirect biases.



Contaminant Source Areas

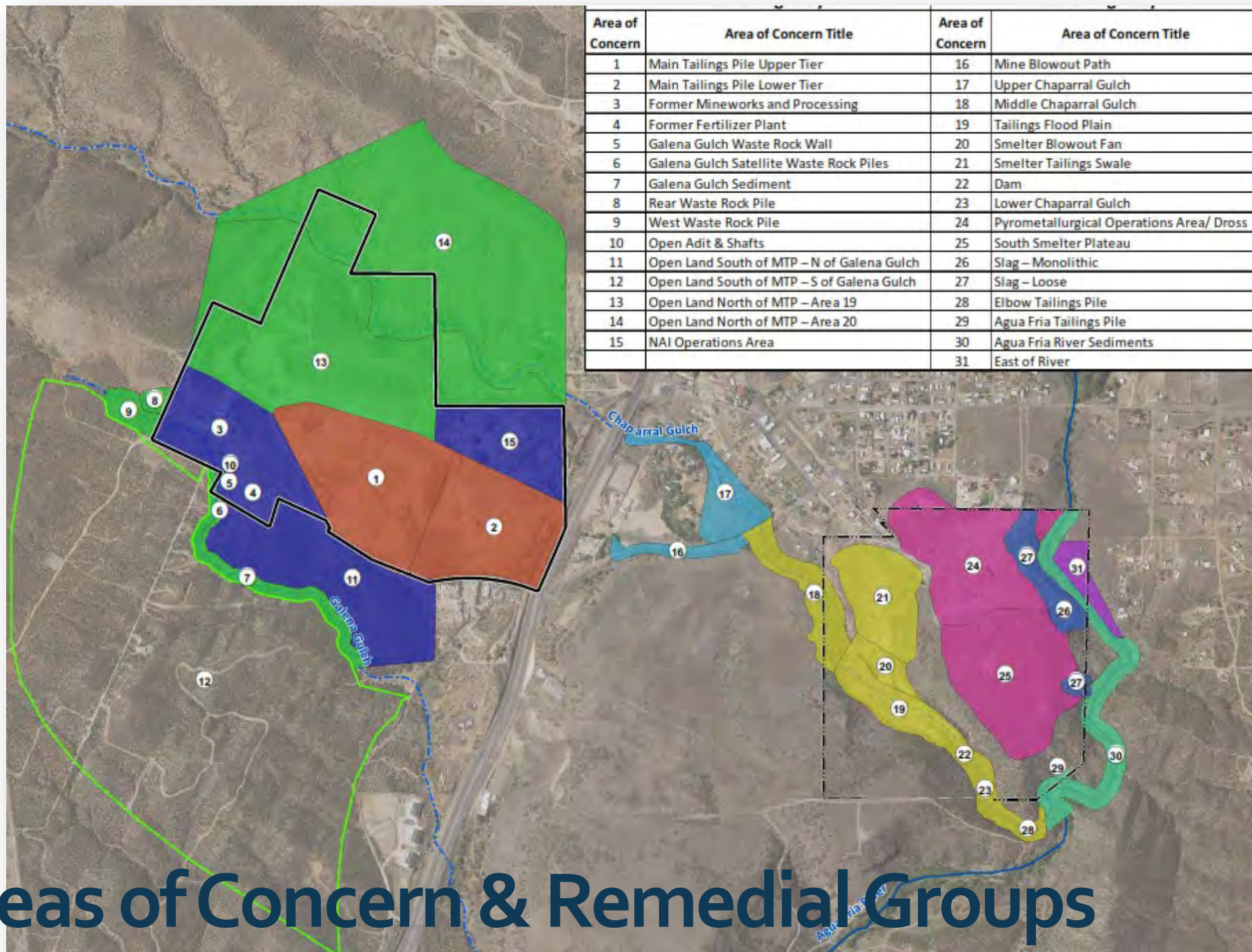
- Legend**
- Former Iron King Mine
 - Upper & Middle Chaparral Gulch
 - Tailings Floodplain & Lower Chaparral Gulch
 - Former Humboldt Smelter
 - Dam
 - Former Iron King Mine Property
 - Former Humboldt Smelter Property
 - River
 - Intermittent Drainage



Notes:
 The boundaries of the former Iron King Mine and former Humboldt Smelter represent property boundaries and do not directly correspond to the area of historical operations or impacts.
 Image Source: USDA 2013.



Figure 1-11
 Site Components



Legend

- River
- Intermittent Drainage
- Former Iron King Mine Property
- Former Humboldt Smelter Property
- Area Not Considered for Remedial Action

Remedial Group¹

- A - Main Tailings Pile (MTP)
- B - Industrial Areas around MTP
- C - Open Land Around MTP
- D - Upper Chaparral Gulch
- E - Middle and Lower Chaparral Gulch
- F - Pyrometallurgical/South Smelter Plateau
- G - Slag
- H - Agua Fria River
- I - East of River

Notes:

¹ Remedial groups are composites of multiple materials with the most prevalent material shown for Groups A, F, and G.

The boundaries of the former Iron King Mine and former Humboldt Smelter represent property boundaries and do not directly correspond to the area of historical operations or impacts. Image Source: USDA 2015.



Figure 1-12
Remedial Groups and Areas of Concern

Areas of Concern & Remedial Groups

COI	ARIZONA	FS PRELIMINARY REMEDIATION GOALS (PRGs) FOR 9 REMEDIAL GROUPS (DECEMBER 2022)									
	rSRL	BACKGROUND	MTP	INDUSTRY / MTP	OPEN LAND / MTP	U CHAPARRAL	M/L CHAPARRAL	S SMELTER	SLAG	AGUA FRIA RIVER	E / AGUA FRIA R.
ARSENIC	10	92	884	92 - 884	92 - 1414	92	274	274	274	92	92
LEAD	400	35	460	197 - 460	197 - 559	197	460 - 559	460	559	128	460

NOTE: All Preliminary Remediation Goal (PRG) concentrations are reported in milligrams per Kilogram (mg/Kg) [ppm].

RES / OCC	<p>ARSENIC (As) & LEAD (Pb) Preliminary Remediation Goals (PRGs) are founded on modelled concentrations. The RI/FS models are incomplete, incorrect, or based on aged versions that are not current with available toxicological information.</p> <p>Arsenic & Lead are the most significant COCs at the Superfund and appropriate remediation requires appropriate application of calculated Background Threshold Value(s). Human Health Risk Assessments must be based on current toxicological information.</p>
OCC / REC	
OCC / ECO	
OCC / REC / ECO	
RES / OCC / REC / ECO	
REC / ECO	

Preliminary Remediation Goals (PRGs)

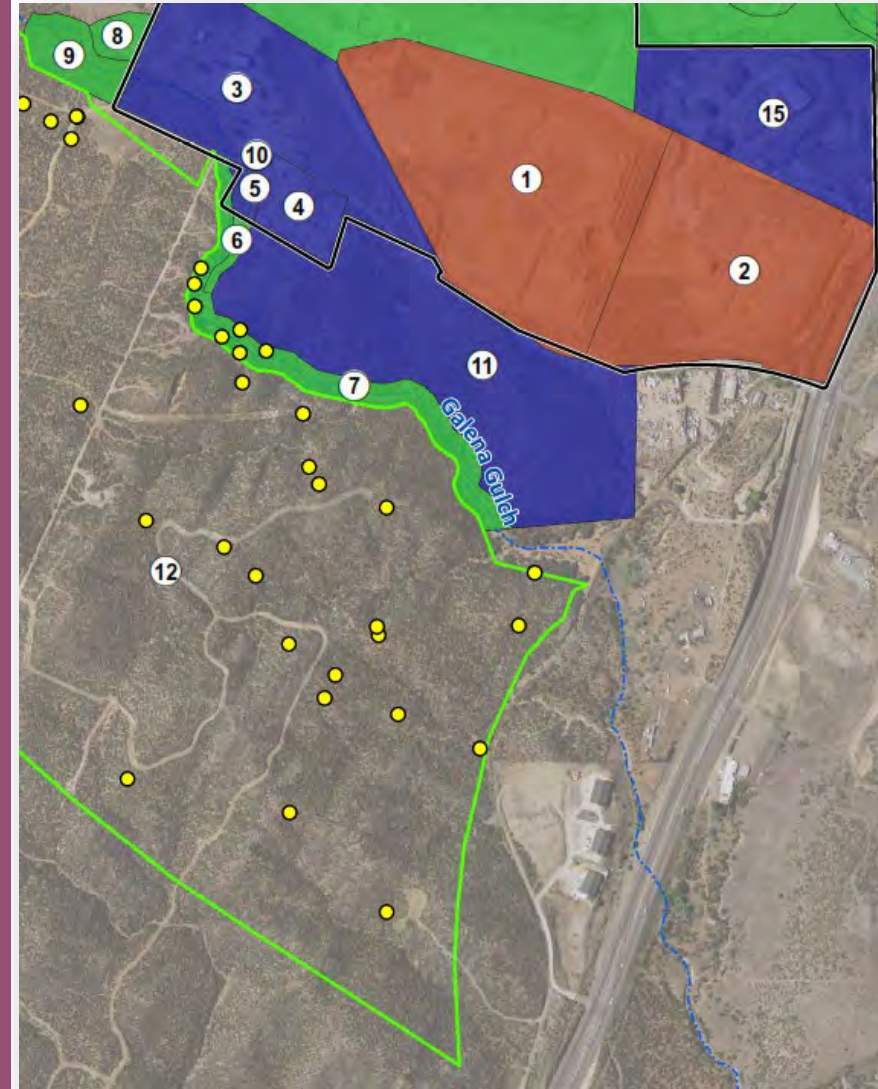
- 1) Once the Exposure Point Concentrations (EPCs) are identified across an Area, the Preliminary Remediation Goals (RPGs) are determined.
- 2) EPA represents “site-specific” PRGs for Arsenic for 30 identified Areas of Concern (AOCs) according to Nine (9) Remedial Groups. These are based on (1) Exposure Risk Category, (2) Background Threshold Limits (BTVs) that are determined based on sample results for soils that are collected outside of the Superfund Site perimeter, and (3) EPA (2009) Integrated Exposure Uptake Biokinetic Model (IEUBK ver. 1.1) for Lead (Pb).

Area of Concern 12

According to the FS, AOC 12 is not addressed as part of the Remedial Plan.

The FS states that soils in AOC 12 do not pose an unacceptable human health risk.

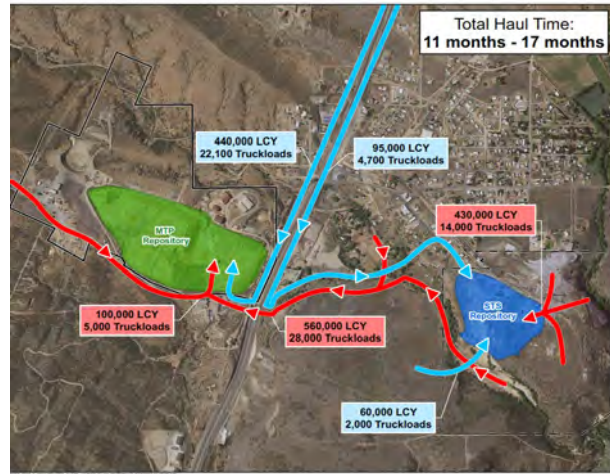
The FS defines the acceptable human health risk for arsenic exposure (soils) to be 10E^{-4} , which “corresponds” to the 92 mg/Kg BTV. The standard acceptable exposure risk is 10E^{-5} , and the EPA Screening Level for soil is calibrated to a 10E^{-6} cancer risk.



EPA FS REMEDIAL ALTERNATIVES

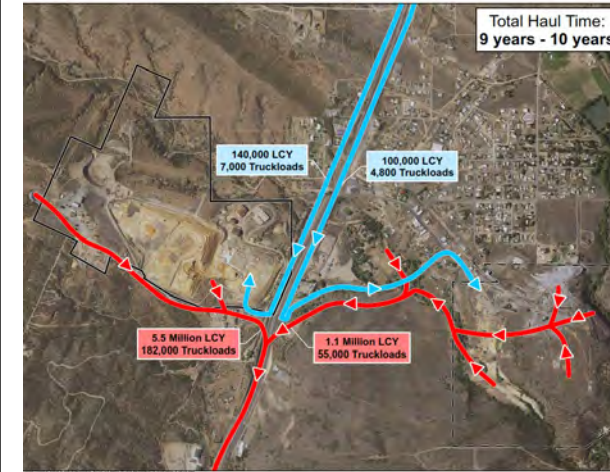
ALTERNATIVE 2

ALL SOILS & MINE WASTE ARE DISPOSED IN ONE REPOSITORY (MTP) AND CAPPED.



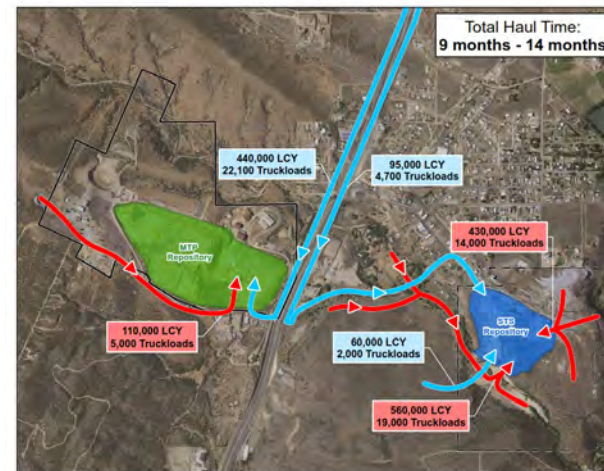
ALTERNATIVE 3B

ALL SOILS & MINE WASTE ARE DISPOSED IN TWO REPOSITORIES (MTP & STS) AND CAPPED. ALL MINE WASTE EAST OF HW 69 IS MOVED TO STS.



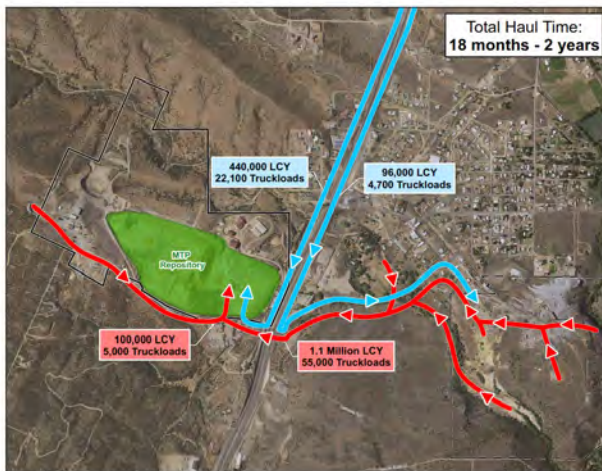
ALTERNATIVE 3A

ALL SOILS & MINE WASTE ARE DISPOSED IN TWO REPOSITORIES (MTP & STS) AND CAPPED. MINE WASTE EAST OF HW 69 IS MOVED TO MTP OR STS.

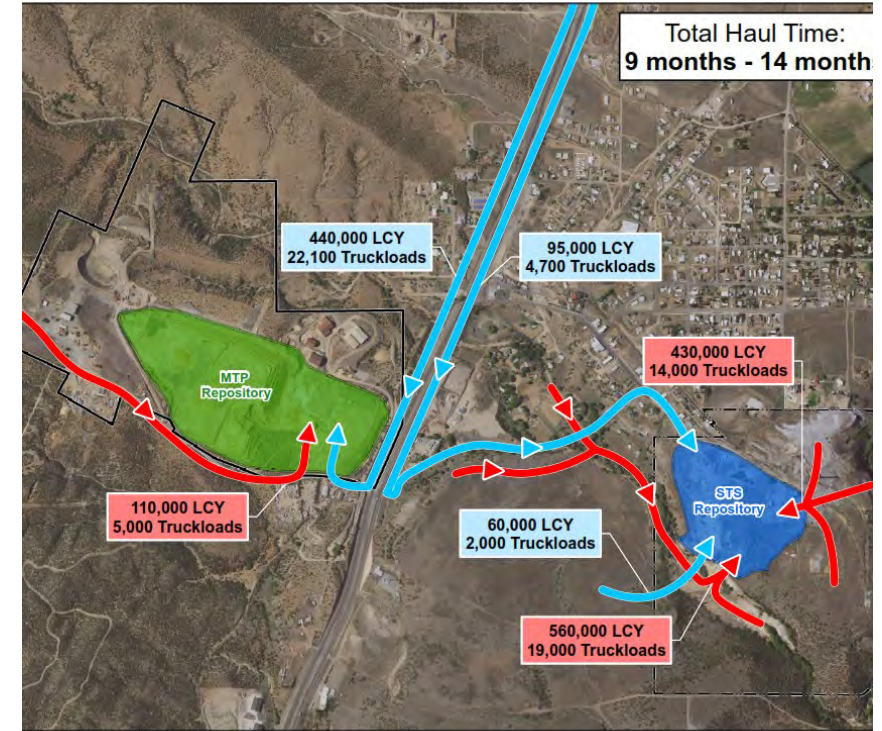


ALTERNATIVE 4

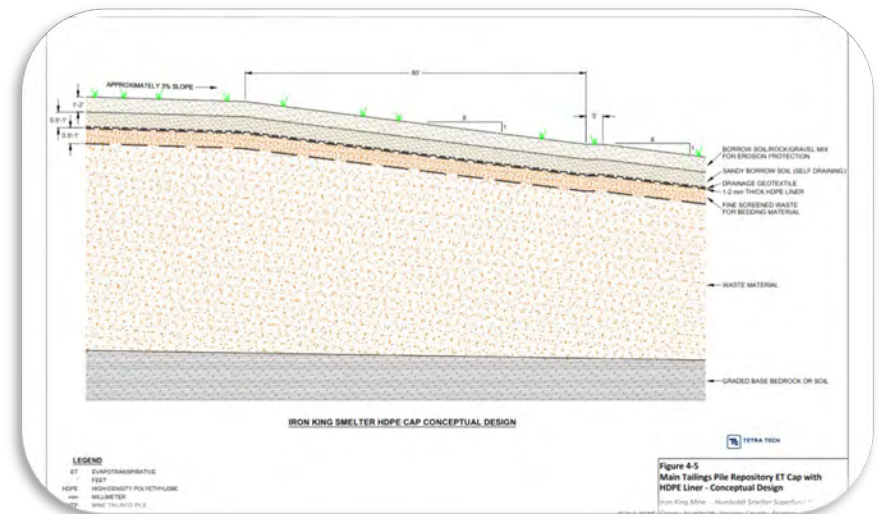
ALL CONTAMINATED SOILS & MINE WASTE ARE REMOVED FROM THE SUPERFUND SITE.



Remove Mine Waste to Repositories



Main Tailings Pile Repository





Remedial Options



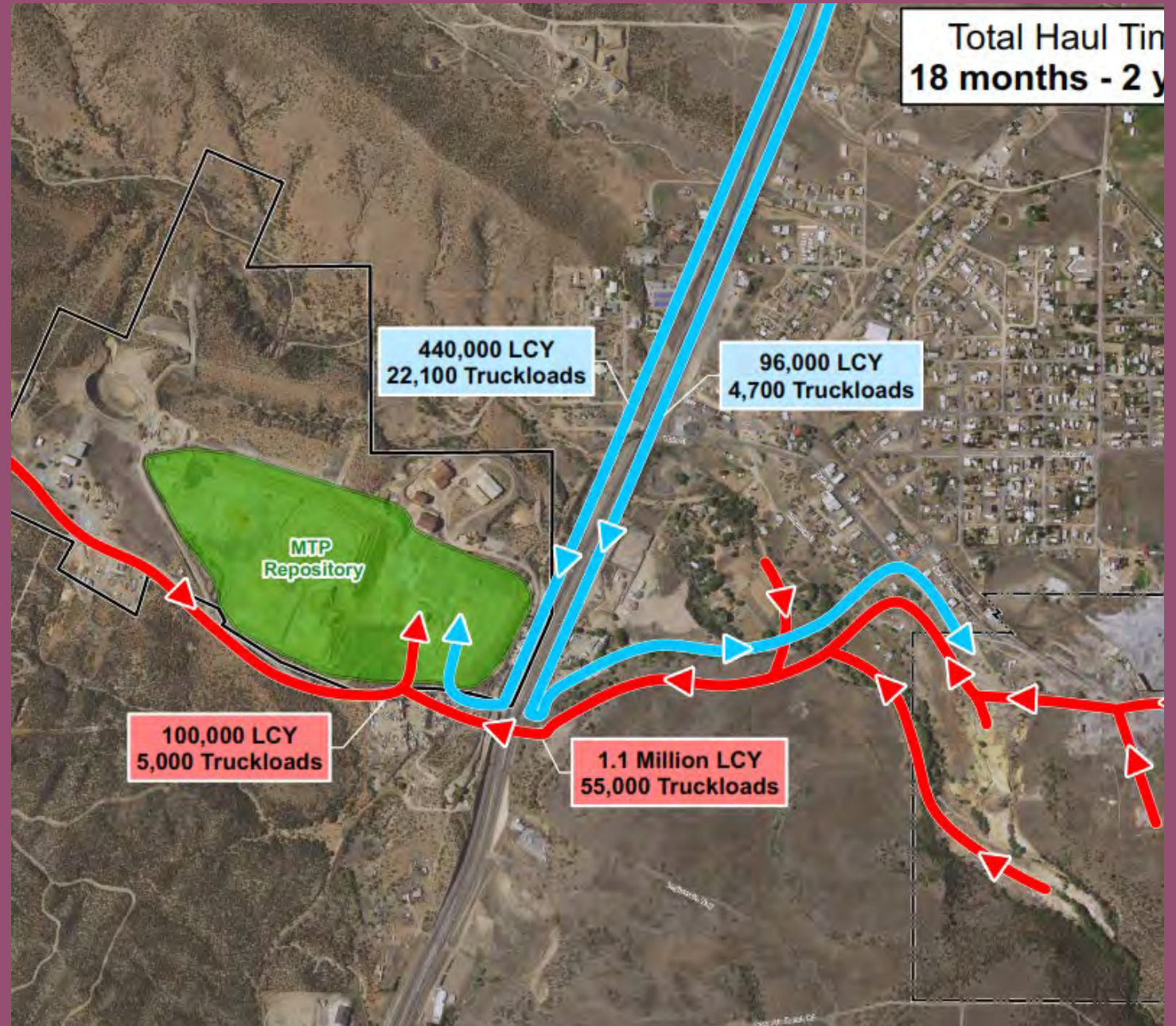
I reviewed each of the four (4) remedial options identified by EPA's Consultant Tetra Tech. These are my preliminary recommendations, pending the Town's thoughts regarding what is best for their on-going and long-term interests.

OPTION 2. Create a Repository for all removed mine waste and contaminated soils at the existing location of the Main Tailings Pile on the Iron King Mine site.

OPTION 3 (A & B). Create two (2) Repositories for all removed mine waste and contaminated soils. One at the Main Tailings Pile (Iron King Mine) and one at the Humboldt Smelter property (Smelter Tailings Swale).

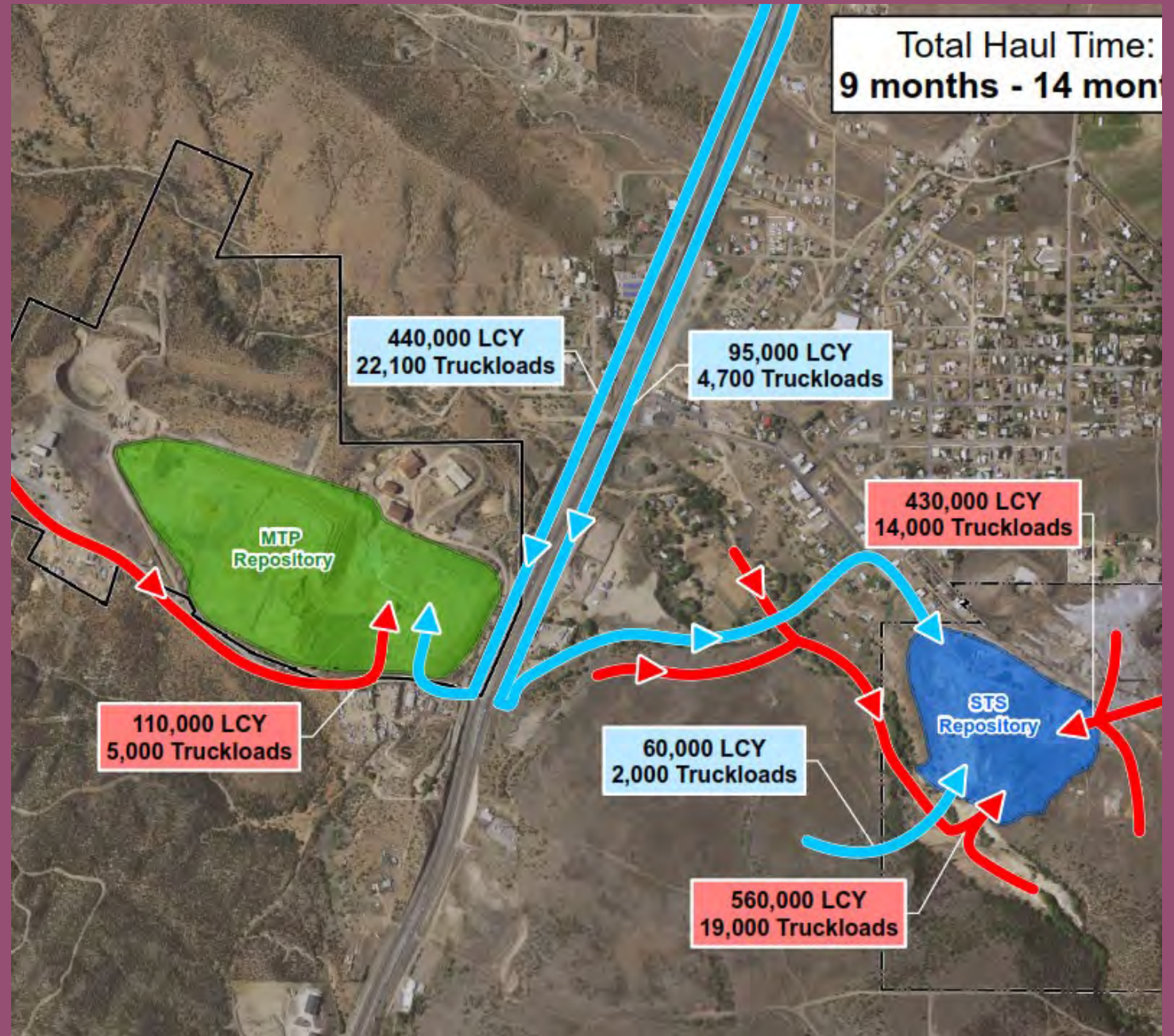
Recommended Remedial Option

REMEDIAL OPTION 2



Recommended Remedial Option

REMEDIAL OPTION 3B



3

EPA | IKMHS SUPERFUND

**WHAT IS ADEQUATE...
WHAT IS NOT**

Assessment of RI/FS Adequacy

ADEQUATE

- 1) Assessment of contamination of groundwater, surface water, and sediments.
- 2) Assessment of the distribution of COCs in soils, including mine waste.
- 3) Feasibility Study of Remedial Options, including detailed assessment of five (5) alternatives.

NOT ADEQUATE

- 1) Determination of an appropriate Background Threshold Value (BTV) according to ADEQ Statute and CERCLA requirements pursuant to ARARs.
- 2) Assessment of Residential Exposure Pathways for soil based on appropriate Background Threshold Level (BTV) for arsenic.
- 3) Reliance on an aged EPA Model to calculate PRGs for Lead. Rejecting the BTV for Lead as a reasonable PRG. Rejecting the AZ State rSRL for Lead as an ARAR.
- 4) Characterization of Ambient Air Exposure Pathways in Residential Areas of the Superfund Site.
- 5) Unjustified dismissal of assessment of AOC No. 12, located south of Galena Gulch, south-southwest of Iron King Mine.

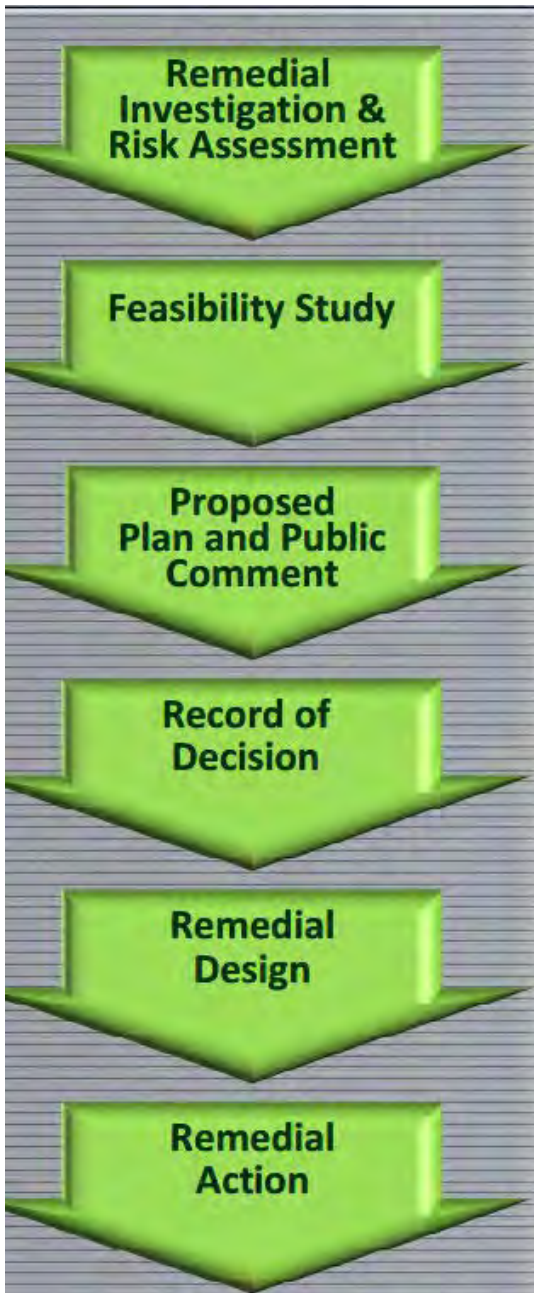


Recommendations

FOR EPA TO CONSIDER...

- 1) Develop a Sampling Plan that addresses representativeness, to assess Residential Properties for remediation. Provide the Plan for third-party review on behalf of the Town.
- 2) Incorporate appropriate BTVs in calculating PRGs for Arsenic.
- 3) Rerun IEUBK Model for Lead Exposure using EPA (2021). Justify not using Pb BTV or AZ rSRL.
- 4) Include perimeter groundwater monitoring wells to monitor leakage and subsurface runoff from the capped repositories. completion of remediation.

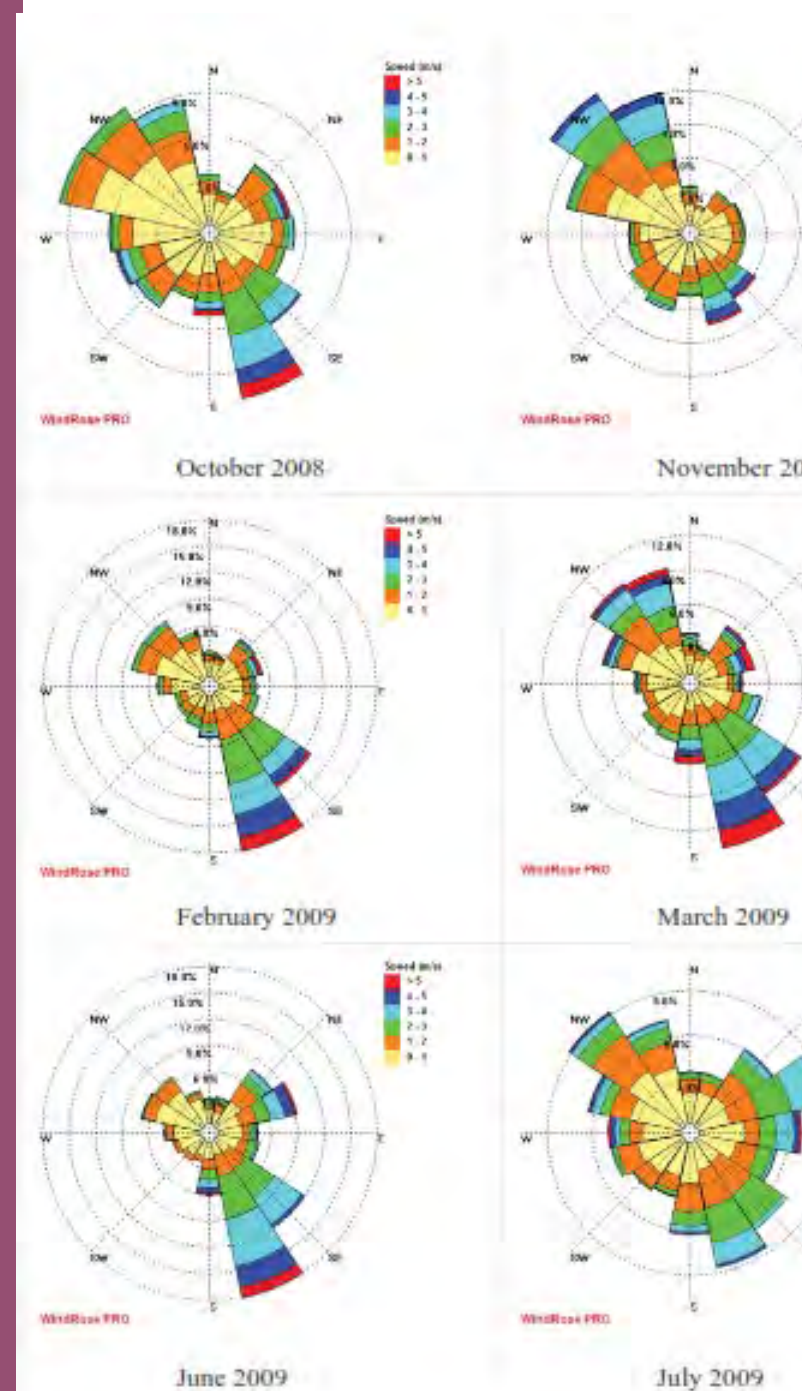


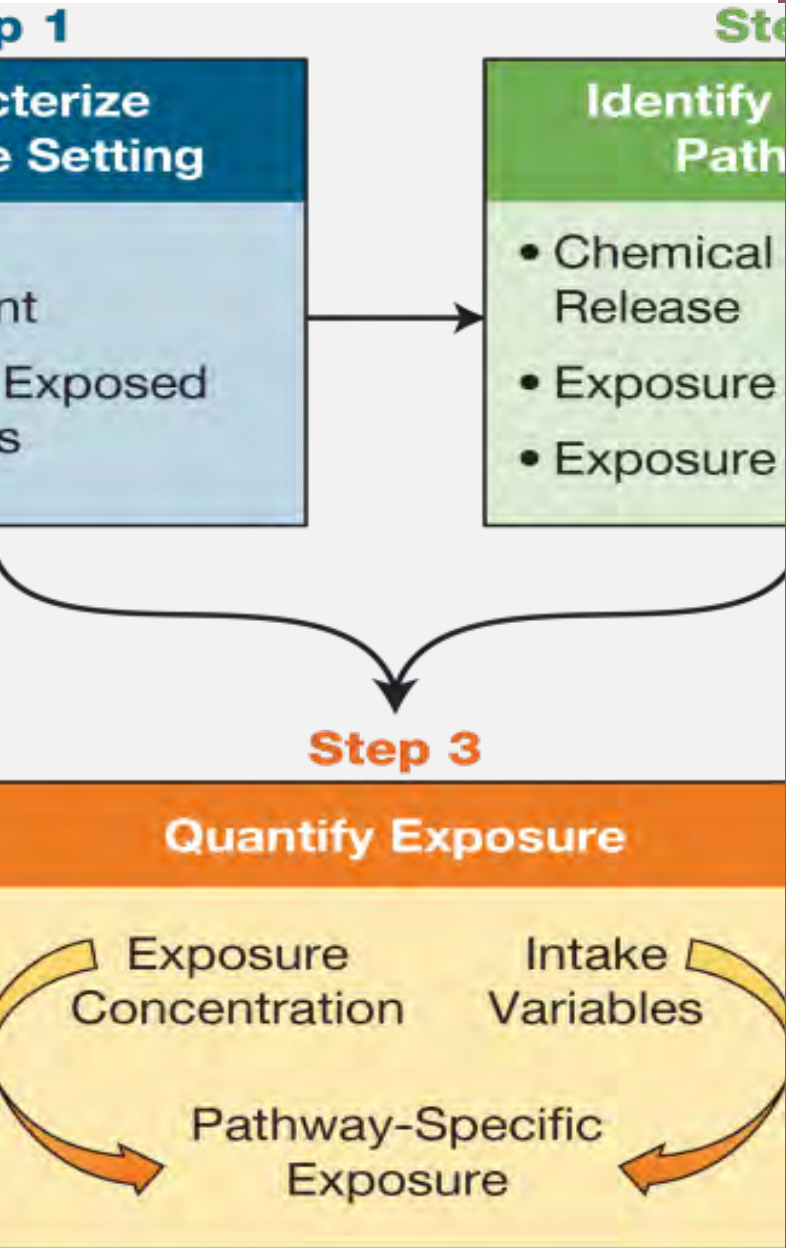


Recommendations

FOR EPA TO CONSIDER...

- 4) Supplement ambient air data for As and Pb (2008 to 2009) with “Rafter sampling”. Account for (i) proximity to the source(s), (ii) age of building, and (iii) location with respect to documented wind currents.
- 5) Include provisions for confirmation sampling to test adequacy of Remedial Action.
- 6) Pending a decision by the Town, support the determination of discreet exposure levels (dosing) of individuals, based on affirmative clinical studies.

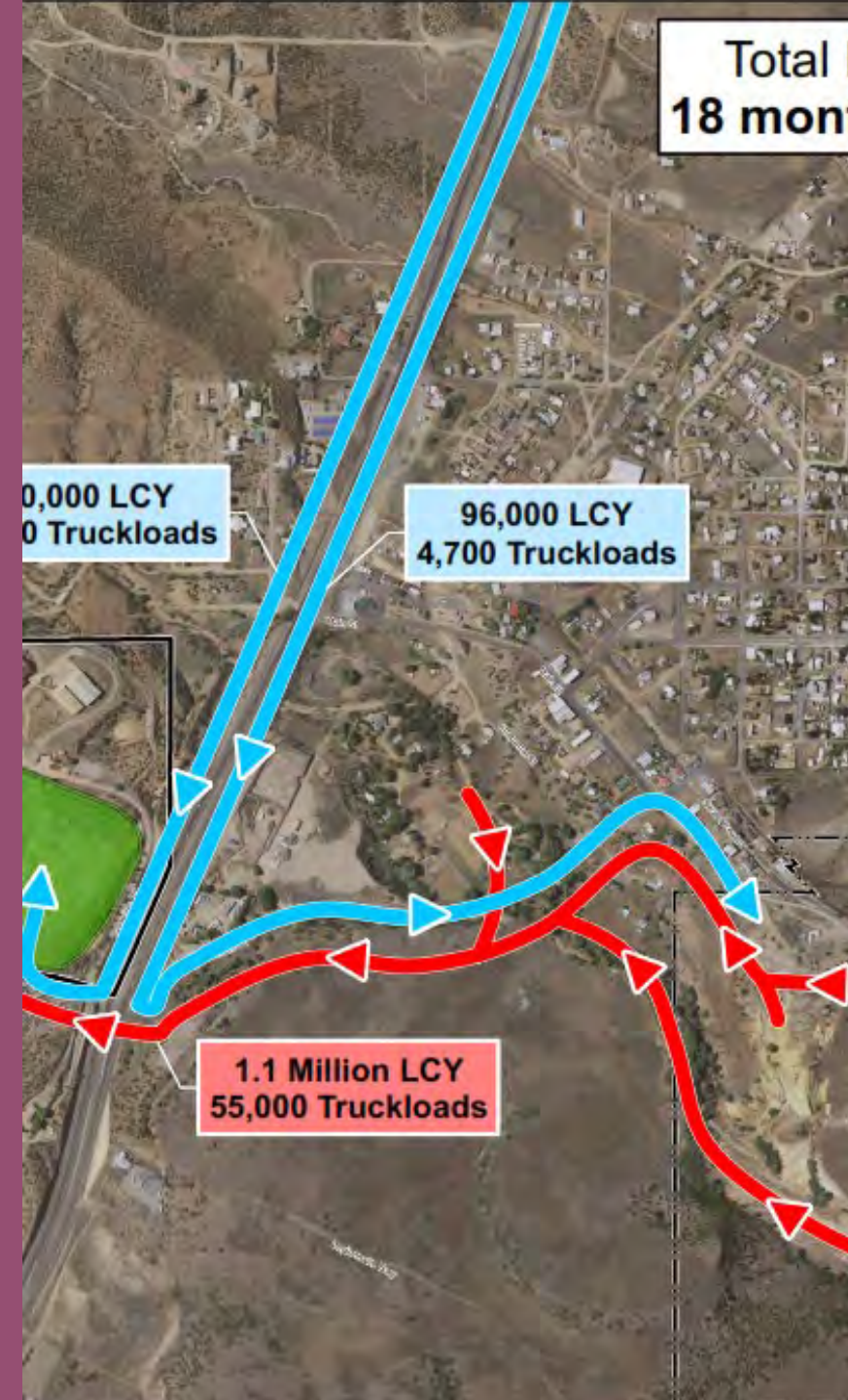




Recommendations

FOR THE TOWN TO CONSIDER...

- 1) Communicate to me the Town's sensitivities regarding the FS Remedial Options so that I can include your comments in my formal response to the EPA.
- 2) Consider incorporating an affirmative clinical assessment of metals exposure for community residents. This will provide answers to questions that EPA is not equipped to provide under the requirements of CERCLA.





Closing Remarks...

MY RECOMMENDATIONS

- 1) IT IS NOT MY INTENT TO DELAY, STALL, OR REDIRECT EPA IN A WAY THAT CHANGES THE TIMELINE TO COMPLETE REMEDIATION.
- 2) I DO INTEND TO MAKE SURE TO THE DEGREE THAT I CAN THAT REMEDIATION IS AS COMPLETE AS POSSIBLE.
- 3) ADDITIONAL WORK THAT I RECOMMEND CAN BE COMPLETED AT THE SAME TIME AS OTHER WORK CONDUCTED BY EPA.

THE EPA SCHEDULE

- 1) THE FORMAL PUBLIC RESPONSE PERIOD MAY BEGIN IN MARCH 2023.
- 2) EPA WILL RESPOND TO QUESTIONS & COMMENTS AND COMPLETE THE RECORD OF DECISION (ROD).
- 3) A FINAL REMEDIATION DESIGN WILL BE COMPLETED.
- 4) EPA WILL HIRE A CONTRACTOR TO COMPLETE THE REMEDIATION WORK.