

**Citizen Issues/Questions**  
**14 May 2009**  
**From Public Workshop in Wallace, Idaho**  
**for presentation at**  
**24 June Public Workshop**

On May 14, 2009, the Idaho Department of Environmental Quality (IDEQ) and the Environmental Protection Agency (EPA) hosted a Community Workshop about the effort to site a repository in the Upper Basin. The workshop gave citizens a chance to raise issues and ask questions about the repository siting process. Citizens also had many questions about other Superfund cleanup activities. The issues and questions were written on flipcharts during the meeting and are addressed here.

A total of 50 issues and questions were recorded. Those issues and questions have been grouped into 11 categories. The citizen question is printed in slanted text below, and the agency response is printed in normal text.

**Category 1. Public Input**

*1a. Is Wallace your only public forum, considering you are looking from Elizabeth Park to Mullan?*

Response: Lots of people are interested in learning about the Upper Basin repository siting process. The agencies will host three forums as we work through site selection. It is difficult to find a room to use in the evening that fits a large number of people. The Wallace Inn location was selected as the meeting site because it is central to the Upper Basin area, can hold many people, is available in the evening, and has good seating, lighting and acoustics.

At the same time, the agencies are sending mailers, putting information on the web, working with local officials, giving updates at other local gatherings, and working with the media to keep people informed. Citizens don't have to come to meetings to participate in the process. They can share suggestions or ask questions by phone, mail, or e-mail.

*1b. Why ask for input when it will be ignored?*

Response: Citizen and local agency input does make a difference and can change the course of a project. For example, as a result of citizen input, the planned height of the East Mission Flats (EMF) repository was decreased from 64 feet above ground to 32 feet above ground. The agencies also are building a bridge from Exit 39 to the EMF site in response to input from the East Side Highway District.

We encourage citizen participation. Your input can result in a better project.

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*1c. Even if a majority of people oppose it, you'll still do it anyway, won't you?*

Response: If a majority of citizens oppose a particular repository location in the Upper Basin, it may be difficult for the agencies to select that site as a disposal area. The agencies would prefer to locate repositories in areas that are acceptable to the Upper Basin communities. However, if the agencies are not able to build repositories, the Superfund cleanup would be delayed and unacceptable risks to people's health and the environment would not be addressed. The agencies have a mandated responsibility to clean up the contamination, manage the waste, and keep people protected. We will fulfill that responsibility.

We understand why people might not want a repository in their neighborhood. At the same time, repositories are needed to safely contain the contaminated soil from cleanup work and development activity. Repositories help protect people and the environment by dramatically decreasing the chance that people will be exposed to contaminated soils. Cleanup work consists of removing contamination from all over the communities and putting it into sites/repositories that can be carefully managed.

Citizen input can and does change the way repositories are located and built. That is why we are asking for citizen input in developing the siting criteria. That input is helping to design the tool that will be used to help IDEQ and EPA in selecting the next Upper Basin repository site. Bear in mind that the tool will not choose the repository site. IDEQ and EPA will select the site using the many tools that they have at their disposal and only after using science, engineering, and best judgment. Refer to the response to Question 1a for an example of how local input has shaped the end result.

*1d. There is no debate.*

Response: EPA is actively seeking public dialogue on the repository siting process. Refer to the response for Question 1a to see how citizens can make a difference.

*1e. Woodland Park – ATVs and motorcycles riding all over that contaminated area – who's managing this?*

Response: This type of activity presents a health risk. Off-road vehicle users riding on contaminated material may inhale or ingest lead and/or arsenic. Also,

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off-road vehicles may track contaminated dirt onto public roads after leaving the site. The contaminated dirt may wash onto clean property and spread contamination, it may turn to dust and be lifted into the air by other road traffic, or it may be tracked by the rider into the rider's home. The Woodland Park area is private property and it is the responsibility of the landowner to manage this site. However, if the property owner is unable or unwilling to manage the site, EPA may take steps to ensure that the property uses at the Woodland Park area are protective of human health and the environment.

*1f. Other ways of dealing with waste besides repositories – get involved.*

Response: Repositories are specified in the 2002 ROD as the method to store contaminated waste. Refer to the response to Question 1c for more information on repositories and their relationship to the cleanup.

We encourage people to share their ideas for soil disposal solutions with EPA and DEQ. Please contact Andy Mork at 208-373-0141 or Ed Moreen of EPA at 208-664-4588 with your suggestions.

*1g. IDFG most concerned about impacts to fish, wildlife, and hunters/other people.*

Response: It is Idaho Department of Fish and Game's (IDFG) responsibility to manage game and non-game species. The IDFG Mission Statement says:

"All wildlife, including all wild animals, wild birds, and fish, within the state of Idaho, is hereby declared to be the property of the state of Idaho. It shall be preserved, protected, perpetuated, and managed. It shall be only captured or taken at such times or places, under such conditions, or by such means, or in such manner, as will preserve, protect, and perpetuate such wildlife, and provide for the citizens of this state and, as by law permitted to others, continued supplies of such wildlife for hunting, fishing and trapping."

The IDFG is a cooperating agency in the cleanup. EPA and DEQ incorporate IDFG considerations into repository site selection.

*1h. How long has DEQ lead (Andy Mork) worked on site.*

Response: Andy has been working on this project since January 2008, about 17 months. Prior to that, he worked as a consulting geologist for 19 years, and

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before that, he worked seven years in the mineral exploration and mining business.

**Category 2. Surface and Groundwater Concerns**

*2a. Much lead and zinc are naturally occurring in the Silver Valley. Groundwater impacts to Fill the Holes?*

Response: The Silver Valley is a world-class deposit for silver, lead and zinc. The ore-grade minerals are located very deep below the surface and do not pose a risk to people directly, but may pose a risk to groundwater. Lead- and zinc-containing materials that pose risks to both people and the environment are from historic mining, milling and smelting wastes that have accumulated in the Valley over 100+ years of active mining.

Arsenic, cadmium and zinc are already in the groundwater throughout the South Fork Coeur D'Alene River valley. Effects to groundwater from any "Fill the Holes" program will be carefully considered so that the program protects the environment. One guiding principal will be to do no further harm to groundwater.

*2b. Citizens oppose the East Mission Flats repository – wildlife, wells, and wetland. Swans killed downstream recently. Will EMF pollute the aquifer?*

Response: The East Mission Flats repository is designed to protect groundwater quality. The Final 90% Design Report is available on the Basin Commission web site (<http://www.basincommission.com/>). Appendix Q in the 90% Design Report presents results of studies looking at groundwater quality. Repository design features were developed based on the studies' findings.

The study found that EMF will not pollute the aquifer. The agencies will complete analyses, including technical verification of the water quality analyses, as recommended in the Inspector General's June 2009 final report on the East Mission Flats repository. In addition, to ensure that water quality is not affected by the repository, groundwater monitoring will be done regularly for the foreseeable future. If results show a release of metals to groundwater from repository operations, we will find the cause of the release and stop it.

Waterfowl eat lead-contaminated sediment in the lower basin and suffer toxic effects. An annual die-off of waterfowl has occurred in the area for decades. Much of the sediment and soil in the Lower Coeur d'Alene Basin contains levels of lead that is potentially lethal to waterfowl. Annual, Lower Basin floods

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continue to carry the contaminated sediments to downstream wetlands, the Chain Lakes, Coeur d'Alene Lake, and beyond.

*2c. How to keep the repository sites from seeping metals into groundwater?*

Response: The repositories are carefully designed to keep metals from leaching to groundwater. Examples of features that protect groundwater:

- During construction, stormwater is collected in ponds to retain sediment and prevent discharges. When the ponds get full, the water is handled appropriately prior to discharge.
- When filling of the repository is complete, the repository top and sides will be sloped to encourage water runoff and prevent ponding.
- When completely full and graded, the repositories will be covered with a clean soil cap and vegetated. The cap will minimize the seepage of surface water into the waste material and potential transport of contamination from the waste material into groundwater.

*2d. What if contaminated materials wash out from repository? Cleanup plan for that?*

Response: The repositories are designed to prevent erosion from rains or floods. Should the unlikely event of a wash-out occur, the cleanup will be planned on an event-specific basis, the cause of the washout will be determined, and prevention measures will be implemented. The State will authorize the engineering services contractor to clean up any material transported off the site.

*2e. How will you keep contamination out of creeks?*

Response: The repositories are actively managed to keep contaminated soil out of waterways. For example: (1) all soil placed on the repository is compacted to make it hard for water to wash it off the repository; (2) side-slopes are kept at a 3 horizontal to 1 vertical [3:1] slope or less to prevent erosion; (3) water channels on the completed portions of the repositories are lined and armored with clean rock to prevent contact with the underlying contaminated soil; (4) silt fences, interim vegetation, and other erosion controls are installed around the disturbed ground to capture fine material in the run-off water; and (5) regular and episodic inspections by operations staff check on the effectiveness of the erosion protection measures. If a portion of the repository is eroding, measures will be taken to stop the erosion.

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*2f. Dirty railroad ties were washed in SF Coeur d'Alene River.*

Response: Washing contaminated railroad ties in the river is not an approved cleanup method. If contractors are caught washing contaminated material in the river instead of taking it to a repository, they will be disciplined with measures up to and including termination. We encourage the public to report such activities to the Kellogg DEQ office at 208-783-5781.

*2g. Hard to find locations without surface water concerns.*

Response: Surface water concerns are a big issue with repository siting. Many of the candidate sites lie within the 100-year floodplain. If a site within the floodplain is selected, it will require special engineering to prevent releases during floods. The flooding issue highlights the importance of careful site selection and design. That is an example of the complicated issues that have to be examined carefully, why the process is so detailed, and takes a lot of time.

*2h. Groundwater concerns. Has a well. Will you guarantee the water's good and test it for perpetuity? Live in Osburn – mineral testing is expensive.*

Response: Contaminated groundwater is widespread in the Silver Valley area. The contamination is a result of groundwater contact with metals-contaminated mining waste. The contamination was present long before the cleanup started. Part of the effectiveness monitoring for the cleanup includes groundwater testing around the repository to monitor for impacts from the placement of the contaminated soils. This testing is planned to continue for many years in the Coeur d'Alene Basin.

Although we cannot guarantee your private well water quality, you may be eligible to have your water tested and may be eligible to be hooked up to a community system or for other assistance. Testing is conducted by IDEQ and can be arranged by calling the Kellogg Project Office at 208-783-5781 (who's POC).

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**Category 3. Repository Siting**

*3a. "Willing Seller" issue – Would government exercise Eminent Domain if 2 of 20 acres were by non-willing seller?*

Response: The agencies have not used their right of Eminent Domain in this cleanup, and it is the Agencies' preference to get repository land without exercising this right. We believe that a suitable property with a willing seller will be found. However, EPA reserves all of its authority, including the right of eminent domain, for the purpose of acquiring property to site repositories necessary for the cleanup of the Basin. In addition, EPA notes that parties who are potentially responsible for the contamination in the Basin maintain or own properties that have been used for storing contaminated mine waste materials. EPA believes these properties may provide suitable locations for cleanup repositories and that it may be appropriate for such parties to allow these properties to be used as repositories.

*3b. Why must the repository be located somewhere from Elizabeth Park to Mullan? Let's look at areas outside this area. Why not pick an appropriate place that would not need to be moved if there's a failure?*

Response: When selecting cleanup options EPA considers whether a repository can be located within the Superfund site to safely contain cleanup wastes. If safe disposal sites are available, EPA will consider other factors such as costs associated with disposing of wastes within or outside of the Superfund site. At the Bunker Hill site, EPA has determined that safe disposal sites can be located within the site and that it is more cost-effective to do so. Since convenient access for people in the Upper Basin is one of the considerations for repository siting, the Elizabeth Park to Mullan area is an appropriate place to look for a new repository.

Repositories are engineered to resist failure. Extensive background studies are performed to identify hazards from earthquakes, floods, landslides and other natural events. That is why the repository selection process is so detailed and takes such a long time. We are trying to find the best available location to safely store waste for a very long time.

*3c. Big Creek is a good repository because the mining company built it, not the government.*

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Response: The BCR site was formerly owned by Sunshine Mining Company (Sunshine) and operated as a tailings pond. Sunshine designed and operated that tailings pond until it was acquired by EPA for purpose of creating a contaminated soil repository. EPA took title to the site in 2002 and transferred the property to DEQ. The evaluation of the site was completed by the US Army Corps of Engineers on behalf of EPA in 2002 and 2003. The BCR was operated by EPA in 2002 and 2003, and since then it has been managed and operated by DEQ with funding and support provided by EPA.

*3d. Why not look at flat ridges, not just valley floor – on federal land. Look at dry sites, no live streams. Good sites above valley floor.*

Response: Both flat ridges and federally-owned lands are being considered as potential repository sites if they are contaminated with mine waste and meet other technical requirements. If the flat ridges are not contaminated, EPA and DEQ would likely not consider them as appropriate locations for cleanup disposal.

*3e. Use Harrison Flats above the water as repository site.*

Response: Thanks for the suggestion on a possible repository site. Harrison Flats may be a good site to store contaminated waste, but it is a long way from the Upper Basin and transportation costs would be higher than such costs for a repository located in the Upper Basin.

Our goal is to locate a site between Mullan and Elizabeth Park to store the waste from cleanup in the Upper Basin. The selected site needs to be a convenient place for Upper Basin Institutional Controls Program (ICP) users to dispose of soil waste from residential, commercial and infrastructure development. We would not want to require ICP users in towns like Wallace and Osburn to drive all the way to Harrison to dispose of ICP waste.

*3f. Why using sites in cities when this was a criterion? Also what about long-haul like the garbage?*

Response: We are evaluating as many candidate sites as we can find for the repository siting process. Although we have not developed the final criteria for siting the repositories, it is likely that potential sites in cities will not grade out very high due to proximity to residential areas and safety issues.

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With regard to the long-haul trucking of soil to a distant disposal site, refer to the responses to questions 3b and 3d for more information.

**Category 4. Yard Cleanup Program**

*4a. How do you choose property cleanups? Seems inconsistent.*

Response: DEQ uses property data such as lead and arsenic sampling results and information provided about children or pregnant women living at the residence to select where or prioritize when the cleanups will occur. In general, the priority properties selected for cleanup are those with children under the age of 7 or pregnant women living at the residence. Once a priority property is identified, every effort is made to ensure it has been sampled and, if contaminated, the construction occurs as soon as possible.

Overall, the goal is to clean up properties from the east and work west. However, weather can interfere, so properties on the west are sometimes cleaned up early and late in the season. In addition, making contact with owners can be difficult; a property may not be sampled or remediated if contact is not made with the homeowner.

To be efficient, cleanups for the most part are done one community at a time. Within each community, the properties where young children or pregnant women live get priority. Also, some properties test high enough for cleanup, even if the property next door does not. For this reason, it may appear that cleanups are random or inconsistent. In fact, cleanups are done in a way that is designed to be fair and efficient, while taking care of the biggest risks first.

*4b. Am I "perpetuating fraud" by consenting to soil testing?*

Response: No. The testing is done to evaluate if soil on a property may be a lead and arsenic hazard to children. There is a medical basis for the testing and the cleanup thresholds. The work is being done to protect human health. However, homeowners who have had their property sampled and are intending to sale their home should be aware of disclosure obligations that other statutes may impose.

*4c. How much money used on stimulus besides money government putting in?*

Response: To continue to protect human health, the federal government will contribute \$10-25 million to the Basin residential property cleanups from the

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stimulus funding over the next 2 to 3 years, Most of that money will go directly to Silver Valley employers and suppliers involved with the property cleanups in the valley.

*4d. Frost line goes down 3 feet – how does 12” of clean soil over contaminants keep contaminants from rising to surface from frost heave?*

Response: With the clean soil over the contaminants, the contaminants are kept in place when frost heaving occurs. The contaminants are kept in place because both the contaminated and clean soil expand due to frost action. The clean soil expands upward and stays above the contamination. The contaminants (particularly lead) do not move because the contaminants are incorporated into the soil structure which is below the 12” of clean soil.

The question of frost heave breaking through the clean cap was put to the Panhandle Health District. Their representatives have been working with cap maintenance issues for over 15 years. According the PHD, no cap failures due to frost heave have been reported.

*4e. Why not spend money to fix sewers and water rather than spend money on cleanup?*

Response: EPA and DEQ recognize that sewer and water systems in the communities need upgrades and repairs. The cleanup that the agencies are implementing does not call for wholesale repair and replacement of aging water and sewer systems. EPA and DEQ are spending Superfund money on performing the cleanup described in the ROD. There are other federal and state programs that focus on water and sewer system improvement. These programs make funds available for communities through the DEQ Revolving Fund Program. Points of contact are available upon request.

*4f. Sampling program for lawns seems very unfair.*

Response: The sampling and analysis plan is approved by EPA and DEQ each year and outlines how a property should be sampled. The protocols have been similar for many years. However, before 2002, properties were sampled by different agencies for different purposes. Generally those properties have been sampled again in more recent years using the recent standardized protocols.

Sometimes one property will require cleanup and the property next-door will not. That is due to different lead and arsenic levels found at each site. Neighboring

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properties may not have the same type of soil because of the fill source used to level the lots may have been different. This may cause one property to require remediation, while the next door property requires no action.

*4g. Osburn not part of original cleanup, bought home there, now you're considering cleaning up Osburn. Why?*

Response: Cleanup activity first centered on the Kellogg–Smelterville area because that was the area with the highest risks to people. As we learned more about the widespread high levels of lead and arsenic and their health risks, the cleanup area was expanded and now includes the South Fork and Main Stem Coeur D'Alene River areas.

**Category 5. Fill the Holes**

*5a. Is filling holes safer than building a repository? Or not? VERY IMPORTANT!*

Response: Filling the holes would involve putting contaminated soil on vacant property to create level ground for economic development. There would be many legal and practical hurdles to overcome. For example, a “Fill the Holes” program would need to make this type of disposal as safe as storing the waste in a repository. The agencies are working with local officials to study options for this program.

*5b. Fill the holes, cap – will solve problem, tell us how you can do it, not why you can't.*

Response: Creating an acceptable “Fill the Holes” policy could allow for waste soil disposal independent from the regular repository-style disposal method. EPA and DEQ are working with Shoshone County and local elected officials to develop a “Fill the Holes” policy. The first in a series of these meetings took place June 18. We will provide a summary of the June 18<sup>th</sup> meeting at the June 24<sup>th</sup> meeting in Wallace.

*5c. Does the developer take responsibility after holes filled? (CERCLA liability)*

Response: Right now there isn't a sitewide “Fill the Holes” policy that addresses the practice of filling holes or responsibilities if it were to happen.. However, it is the responsibility of the property owner to maintain the cap on all cleaned-up properties pursuant to the ICP.

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*5d. Fill the hole – East of “Bridge to Nowhere.” – for school bus yard and other uses – can this be done?*

Response: The “Fill the Holes” policy is in the discussion stage so it is too soon to say. See responses to questions 5a and 5b.

*5e. Fill the holes with structural fill to leave us with some economic benefit.*

Response: A group of local, State and Federal representatives are meeting to develop a policy on “Fill the Holes.” Placement of structural fill is a complicated request that would require a much greater effort and resources than providing soils and will be part of future discussions on filling the holes. Specific details of the new construction such as geotechnical investigations and foundation design will be the responsibility of any site developer. IDEQ and EPA recognize that filling the holes may facilitate site re-use and development.

**Category 6. Waste Disposal**

*6a. Why not ship waste out of here? Could be cheaper way.*

Response: When selecting cleanup options, EPA considers whether a repository can be located within the Superfund site to safely contain cleanup wastes. If safe disposal sites are available, EPA will consider other factors such as costs for disposing of wastes within or outside of the Superfund site. At the Bunker Hill site, EPA has determined that safe disposal sites can be located within the site and that it is more cost-effective to do so. This means that the waste soil from the Coeur d’Alene Basin cleanup will stay in the Coeur d’Alene Basin. Trucking to a local disposal site will be much cheaper than trucking to locations outside of the Site.

*6b. Take waste to Yucca Mountain.*

Response: Transporting waste to Yucca Mountain would be prohibitively expensive and not a responsible use of US taxpayer money. See the response to question 6a for more information.

*6c. Is the Yucca Mountain floor cracked?*

Response: The integrity of the proposed Yucca Mountain Repository in Nevada is not relevant to repository siting in the Upper Basin. If anyone is interested in

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follow-up on this question, we can find out who can answer questions on the Yucca Mountain facility.

*6d. Long haul – Load to trucks and transport to railhead, lease railroad cars. Send south somewhere.*

Response: This disposal alternative involving long-haul trucking, trans-loading to railcars and shipping elsewhere would be prohibitively expensive. We are looking for a local site to serve public needs for ICP waste disposal and EPA/DEQ needs for remedial action waste storage. See response to question 6a.

*6e. If you're filling, how do you know you haven't exceeded allowable limits?*

Response: Material that is generated by the EPA and DEQ-led cleanup will be sampled to make sure it does not go over the allowable limits for contamination. Waste soil from the Institutional Controls Program (ICP) is subject to permitting by the Panhandle Health District (PHD). PHD uses "waste acceptance criteria" to determine what waste can go to the repositories. For details, call PHD at 208-783-0707.

**Category 7. Government Gulch**

*7a. I favor filling Government Gulch – it makes sense.*

Response: Government Gulch is on the list of sites for evaluation as a new repository. If selected as a repository site, Government Gulch will be filled with waste from the Upper Basin.

If it is not selected as a repository, it may be filled with clean or contaminated soil to accommodate redevelopment. The State owns Government Gulch, and would evaluate opportunities to fill Government Gulch on a case-by-case basis. Since the Gulch may need over 400,000 cubic yards to make it level with the road, there is no single project on the horizon that could deliver that much waste. The filling process would take place over a number of years from a number of sources.

The Agencies are OK for developers to place clean or contaminated fill for development in Government Gulch. Many local officials feel Basin waste can be used to fill Government Gulch but cannot go to Page repository; this Basin waste could be routed to Government Gulch to level the site. One thing the Agencies

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need to develop is criteria on how developers should characterize contaminated materials going to Government Gulch to ensure principal threat materials aren't used as fill. With respect to groundwater protection, property development will not be delayed even though the agencies have not yet selected final cleanup actions to protect water quality in Government Gulch. One thing that is certain at this point, EPA/DEQ will not reprocess material from Page to fill Government Gulch.

*7b. Will State make Government Gulch marketable property – no one will reasonably pay it. It doesn't have value if you can't sell it. Can be engineered to work.*

Response: The State considers Government Gulch marketable property as-is. The property is now up for sale or lease, but market conditions are slow and commercial/industrial property is not selling well. As an example of this, there are about 25 acres of level property at or near road-grade at the south end of Government Gulch that has not created developer or buyer interest. When the market turns around, we expect more interest in the property.

*7c. Government Gulch – Economic Development – Had a potential buyer with 60 employees. The deal fell through. Can't sell the property in Government Gulch "as is" – it's not sellable as is. – Fill the holes – how do we fix this? Don't say why we can't!*

Response: There are many items factored into an owner's decision to acquire property and open a new facility. Things like population base, local and state tax structure, access to transportation, utility infrastructure, zoning, location relative to raw materials and market for products are important, as well as a sound business plan and availability of financing to bring the idea into reality. The potential owner mentioned in the question made no serious run with the state regarding this project, and we suspect the deal fell through for reasons other than the availability of ground at Government Gulch.

In regard to the "Fill the Holes" program, the agencies are working with the local community to develop this policy. See responses to questions 5a through 5e for more information on Fill the Holes.

*7d. Doesn't believe Government Gulch is truly being studied.*

Response: Government Gulch is being evaluated as a potential repository for the Upper Basin. In addition, Government Gulch was the focus of a 2006

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redevelopment study. The 2006 study compared Government Gulch and Page as repository locations and concluded that Government gulch fill costs would be relatively comparable to the cost of disposal at the Page repository. The 2006 study also concluded that the Page repository will hold more waste and have a much more compact footprint than one would in Government Gulch.

The 2006 study did not factor in the increased costs of capping and maintaining the Government Gulch area, so the overall cost of developing a new repository at Government Gulch would be higher than at the existing Page repository. Since Page is an existing repository, the decision was made at that time to continue disposal at Page rather than develop a new repository at Government Gulch.

**Category 8. Page Repository**

*8a. Why not extend Page to the west?*

Response: The Page repository is expanding to the west. A 1.6-acre expansion is getting under way now. The expansion will accommodate approximately 75,000 cubic yards of waste soil. Because the Page is operated under agreement with EPA, DEQ and the Upstream Mining Group and has different management rules than the other repositories, the expansion will be used to store soil generated in the Box, not the Basin.

..

*8b. Page site with wetland to the west – why not just fill West Page Swamp? It's not useful now.*

Response: The short-term plan is to fill a 1.6-acre area next to the existing Page repository. The wetlands there are already contaminated. A wetlands analysis is needed, and some mitigation will be required. Even with the Page repository expansion, a repository is still needed in the Upper Basin. See the response to question 8a.

**Category 9. Waste Reuse**

*9a. Can contaminated soils be put to use somehow, cement railroad ties for example?*

Response: Contaminated materials including concrete, asphalt, trees and stumps are expected to be re-used. Re-use will limit the amount of material stored in the repository and extend its service life. Plans are in place to create

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separate stockpiles of reusable materials. Then they can be recycled for future use for such things as road gravel and wood chips for use on the repository sites.

Using contaminated soil in concrete items such as railroad ties is difficult because soil does not make good concrete. Concrete is a blend of cement (powdered limestone), gravel and sand. Including soil in the concrete mix would decrease the strength of the concrete and make the concrete unsuitable for many typical concrete uses. .

*9b. Why not make contaminated soil into aggregate or other concrete.*

Response: Materials re-use is addressed in the response to Question 9a.

**Category 10. Indoor Cleanup**

*10a. My main concern is children's health. Do you have an indoor cleanup program/plan?*

Response: The current cleanup plan for the Basin calls for the EPA and DEQ to look at the need for interior cleaning when we finish cleaning up the outside soils throughout the Basin communities. Due to a number of different factors that affect indoor house dust levels, it has been shown that indoor cleanups are not effective if outside soils have not yet been cleaned up. Right now we are a number of years away from completing property cleanups in the Basin, so we have not yet figured out whether any interior cleanups will be needed in Basin communities.

Within the Box communities average lead concentrations in interior dust have remained below the goal of 500 parts per million (ppm) since 2002. A small percentage of homes have lead concentrations above 1000 ppm. EPA and DEQ continue to monitor lead concentrations of interior dust and are evaluating options to address the individual homes that exceed the lead action level.

The Lead Health Intervention Program is a public health service offered by the Panhandle Health District to test children's blood for lead. This will help identify if children are exposed to lead in their environment. PHD also has trained staff with information on how to reduce your family's exposure to lead and arsenic-containing house dust.

Frequent damp cleaning of interior surfaces is recommended. The Panhandle Health District loans High Efficiency Particulate Air filter (HEPA) vacuums to

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**for presentation at**  
**24 June Public Workshop**

residents in the community if they do not have a vacuum cleaner or would prefer to use a HEPA vacuum.

**Category 11. Unclassified**

*11a. Water treatment plant “will get it anyway.” Felt we should have said “dirt stays here” by law.*

Response: We are sorry for not capturing this issue in such a way as to identify the citizen’s specific concern. We will be available in the next two meetings in Wallace to clarify and address this issue.