



# Frequently Asked Questions

## Proposed Cleanup Plan for the Upper Coeur d'Alene Basin *Public Comments Due August 25, 2010*

Revised July 2010

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This document answers questions about the Proposed Cleanup Plan for the Upper Basin and the “Record of Decision Amendment” for the Bunker Hill Superfund Site. This proposal is in addition to the ongoing property cleanup which will continue until completed. The overall area of this site is often called the “Coeur d’Alene Basin.” As the process to modify the cleanup plan moves forward, you may have other questions. Contact the people listed in this document for information at any time.

### **Why should I care about a change to the cleanup plan?**

Changes to the cleanup plan will result in a more complete cleanup in the Basin. This proposed cleanup will protect the people, the environment, and the economy, and is a wise investment for the future. It will create jobs and diversify the economy of the Silver Valley. It removes contamination along creeks and rivers to enable safe recreation, healthy fisheries and riparian life, as well as expanded tourism opportunities. The changes will also add more cleanup actions to the current plan. Because of this, the cleanup will take longer and ultimately cost more. To make smart use of dollars, the Proposed Cleanup Plan includes a priority list which will help the agencies pick the most important cleanup jobs to do first. A more complete cleanup means a cleaner place to live, work, play, and raise a family.

### **Why is there an environmental cleanup?**

Over a century of historic mining, milling, and smelting practices in north Idaho has resulted in widespread contamination of soils, sediments, surface water, and groundwater. The levels of contamination are way above acceptable state and site specific standards. Contaminants include lead, zinc, cadmium, arsenic, and other metals. Millions of tons of old mill tailings, mine waste rock, and ore concentrates are spread across the site. The contaminants pose a risk to people (especially young children), wildlife, fish, and the environment. The Superfund cleanup program is helping to reduce this risk. Cleanup has been going on since 1986.

### **What is a ROD Amendment?**

#### **What is a Proposed Plan?**

A Record of Decision or “ROD” is a document that guides cleanup efforts at a Superfund site. A change to a cleanup plan is a “ROD Amendment.” A ROD Amendment is required when EPA determines that the scope of the remedy must be changed to protect human health and the environment. Before the ROD is amended, EPA considers comments from the public on a “Proposed Plan.” The Proposed Plan presents cleanup alternatives.

**You Can Comment on the Proposed Plan:  
Comments Due August 25, 2010**

Bring your comments to the meetings noted below or mail them by August 25 to: Coeur d'Alene Basin Team, EPA, 1200 6<sup>th</sup> Avenue, Suite 900, ECL-113, Seattle, WA 98101. Or, email your comments to: [cdabasin@epa.gov](mailto:cdabasin@epa.gov)

**You're Invited:  
Open House, Public Meeting August 4, 2010  
Shoshone Medical Center, Health & Ed Center, 858 Commerce Drive,  
Smelterville, ID 83868**

Open House: 5-6:30 pm – Drop in any time, see displays, talk to project reps, ask questions, submit written comment on the Proposed Plan

Public Meeting: 7-8:30 pm – Hear a formal presentation, present your oral comments for the record, submit written comments

This is the best time to influence the overall cleanup plan for the Upper Basin, and EPA encourages you to comment. However, it is not the only chance to be involved. There will be many future opportunities for community input on the cleanup and work planning.

**What does this mean for my community?**

A cleaner environment is better for people and wildlife. Cleanups done under the Proposed Cleanup Plan will help protect not only people, but also protect fish and wildlife. Water quality in the Upper Basin will be improved. Efforts to protect communities from tributary and rainfall flood will be made, and these efforts will help keep cleaned up areas clean. The most urgent cleanups will get done first.

The proposed cleanup is good for the local economy. Millions of dollars have already been invested locally for the cleanup, and the investment will continue. Currently, the cleanup employs about 200 local workers. Additionally, a cleaner environment can help open the door for new commercial, recreational and real estate development. If the past is any indication, cleanup will help foster future economic development opportunities. We've all seen the benefit of the golf course, water park, and trail – developments made possible in part by the cleanup.

The agencies understand that this cleanup does impact people's lives. It has been a long-term effort and will continue for decades. Any time you have concerns, you can contact the agencies locally. Many EPA and DEQ staff working on this project live and have their offices within the site. DEQ has a local office in Kellogg, and a community liaison is stationed there. EPA maintains a field office in Coeur d'Alene. Citizens can call or stop in to talk about issues and ask questions.

**Will all this work make it harder for mines to do business in the area?**

No. EPA is here to protect the environment, not to put mines out of business. This area has a proud mining history which we respect. While contamination has occurred from past practices, mines in the U.S are now required to comply with federal and state laws that may not have existed historically. This Proposed Cleanup Plan will not change existing law. Responsible mining can still occur as it does in other parts of the country. Even in places where cleanup has been done, mines could be re-opened provided the activity does not limit the effectiveness of the actions taken on that site. EPA is prepared to coordinate its cleanup efforts with the owners of property, including mining companies, where cleanup has been selected. This coordination will minimize conflicts between ongoing operations and cleanup.

### **Why not do the cleanup in 10-year pieces, instead of creating a long-term plan?**

A long-term cleanup plan provides a "road map" of the Upper Basin cleanup that is clear about the scope and scale of cleanup actions necessary to achieve goals. This approach gives some certainty to the agencies and communities about what the cleanup actually includes and its cost. At the same time, there will be plenty of opportunities for public input along the way, including opportunities for public comment should EPA make significant or fundamental changes to the selected remedy.

Additionally, having a grasp of the big picture will help EPA wisely spend settlement money, and fewer taxpayer dollars. This approach gives the Trust flexibility to manage cleanup funds for the long-term. Also, it is time intensive and costly to amend RODs. Rather than amending the ROD every so often to add sites, it is easier to remove sites from the list if no further action is required. It makes more sense financially to get the job done now and be thorough about it, instead of taking a piecemeal approach.

### **How will I be affected?**

Cleanup could affect you. Cleanup work will continue to create scores of jobs for local workers. In addition, you may see workers and equipment moving dirt. Traffic patterns could temporarily change as roads may need to be rerouted to give access for trucks and other large vehicles needed for the cleanup. Access to homes and businesses will be ensured. Actions at mine and mill sites could also temporarily or permanently restrict access to some roads. EPA will be working with officials from Shoshone County and local communities, the public, and land management agencies, such as the Bureau of Land Management and the U.S. Forest Service, to identify and reduce impacts to traffic routes. Throughout the cleanup, EPA will work with local officials and the public to identify any adverse impacts and take steps to reduce them. An Implementation Plan (discussed later) will lay out work plans in advance and will be developed with ongoing public input.

### **What area is covered?**

The Proposed Plan will select cleanup actions in the Upper Coeur d'Alene Basin. The Upper Basin includes the South Fork of the Coeur d'Alene River and its tributaries downstream to where they combine with the North Fork. Also included is the 21-square-mile Bunker Hill "Box" around the old Bunker Hill smelter, where EPA began its cleanup work in the 1980s. Each local community will be affected differently by the cleanup. The Proposed Plan lays out cleanup work that could happen in different areas. Also, EPA is developing an "Implementation Plan" to identify areas of work and general schedules. Plus, although the Proposed Plan focuses on the Upper Basin, it also benefits the Lower Basin by reducing the amount of contaminants coming from upstream.

### **What is the Implementation Plan?**

The Implementation Plan is the process to identify the highest priority sites in 1-5 year increments, get community input on those actions via the Basin Commission process and other public participation opportunities, and evaluate the effectiveness of the actions. The Implementation Plan itself will spell out the details on what constitutes a high priority site, what factors are used to select the type and location of sites, and how to use the information collected from an action to set the next group of priority sites.

### **What is the goal of the ROD Amendment?**

The main goal of the ROD Amendment is to select cleanup actions to protect human health and the environment. The ROD Amendment will set out a comprehensive, holistic ecological and human health cleanup approach across the Upper Basin. Protecting human health remains EPA's highest priority. This ROD Amendment aims to reduce the amount of heavy metals getting into streams. Ultimately, this action will provide cleaner water to protect fish, wildlife, recreational users, agricultural uses, and public water supplies. It will also include cleanup in more places that are used for recreation and provide a better quality of life for residents. In addition, the ROD Amendment will select actions to maintain or protect previously selected human health remedies that are vulnerable to erosion and recontamination.

### **What cleanup actions will take place under the new cleanup plan?**

The previous ROD identified a number of cleanup actions but did not identify which should be done first. The Implementation Plan will identify priority actions from the ROD Amendment to be completed in the near term as funds come in. This will help ensure that the most important actions happen first. Some places for cleanup were identified in past studies. Some will be new. Most new places are in the Upper Basin, including Ninemile and Canyon Creeks. They include some mine and mill sites, mine adits, and parts of streams containing mine waste. Actions also will include areas in the Upper Basin and Box where clean water gets contaminated after flowing through mining waste below the ground surface.

Typical actions include moving old mine waste out of the streams and capping the waste. The ROD Amendment will also include a more comprehensive approach to water treatment for the Upper Basin and Box, rather than looking at areas one by one. This could mean piping contaminated water to a central place for efficient treatment, rather than trying to treat each source separately. Also, some channels may be lined so that clean water can flow around contaminated areas.

### **Why do a ROD Amendment when there is still a lot of cleanup to be done under the existing decision documents?**

A greater understanding of the Upper Basin has been gained over the last 8 years from site investigations, groundwater modeling, research into groundwater-surface water interactions, and ecological studies. A comprehensive approach can now be taken to address contamination in the Upper Basin. Except for some mine and mill sites, most prior Upper Basin cleanup work has focused on residential properties. Protecting human health remains the highest priority for EPA. As this work is completed, EPA can move forward with the other cleanup work in existing cleanup plans. However, the existing plans do not include all sites where cleanup is needed to protect human health and the environment.

Also, up to this point, EPA has been managing the Upper Basin and Box under two different cleanup plans. The Upper Basin and Box have similar water quality problems that harm fish and other wildlife. EPA also knows that solutions are similar for these two areas. As a result, the

Proposed Cleanup plan will look at each of these two areas together and set priorities for cleanup actions across the Upper Basin and Box to address water quality issues. This approach helps address the National Academy of Sciences' recommendation for a more well-rounded and complete cleanup strategy.

**Why do we need water treatment? Won't it reduce flows in the river? Can we just rely on source control upstream?**

Source control alone will not clean up surface waters. Simply put, contamination levels are so high in some waters where the source of contamination is buried beneath communities and related infrastructure that water treatment is necessary to do the job.

Water treatment is the fastest and most effective way to reduce metal loading in streams and downstream waters. Water treatment for the Box represents only about 3% of the total cost in the Proposed Plan, yet accounts for 40% of the load reduction.

Highly contaminated groundwater will be collected, treated, and then discharged back into the South Fork Coeur d'Alene River. In the driest conditions, the collected water represents less than 10% of the total river flows, and the collected water after treatment will be cleaner and returned to the river. Under normal river flows, the collected water represents about 5% of total river flows. Because the volume of water that will be collected and treated is small, and returned to the river, any changes to flow will be very small.

**Will more waste repositories be needed as a result of the ROD Amendment?**

Yes. More cleanup work will be going on, so more repositories will be needed. Repositories are the places where contaminated soils from the cleanups are brought together, managed and secured. Repositories help protect people and the environment by dramatically decreasing the chance that people and wildlife will be exposed to metals-contaminated soils. Repositories constructed under the ROD Amendment will be engineered and constructed to reliably contain waste material. Repositories will prevent contaminants from being released to surface water, groundwater, or air in concentrations above state and/or federal standards.

At this time, it is not possible to estimate the number of repositories needed to contain the wastes that come from the ROD Amendment work. The number of future repositories will depend on: (1) the volume of waste for storage; and (2) the size of the future repositories. The bottom line is, the larger the repositories, the fewer will be needed to store the waste.

Large, centrally-located repositories are one option for ROD Amendment waste storage. However, for mine and mill site (source area) cleanups, EPA's first step will be to look for opportunities to safely consolidate and cap waste on site. EPA has used this approach successfully on many occasions and, as a result, has been able to reduce the volume of soils hauled to repositories. In a broad sense, we can minimize the capacity and number of repositories needed for cleanup work by maximizing the number of sites where we consolidate contaminated soils in place. If EPA cannot safely contain waste at a cleanup site, it will be taken to a repository. EPA's goal is always to protect people and the environment.

DEQ, EPA, and the Basin Commission are working together to find places for new repositories in the Upper Basin. To learn more please contact Andy Mork, DEQ, at 208-373-0141 or Ed Moreen, EPA, 208-664-4588 or visit [http://basincommission.com/TLG\\_PFT\\_Repository.asp](http://basincommission.com/TLG_PFT_Repository.asp). Without repositories, the cleanup cannot proceed and the public will continue to be exposed to be high metals levels.

### **What happens if there is no ROD Amendment?**

The historic legacy of mine waste contamination will continue to degrade the quality of water, soils, sediments, and environment of the Upper Basin, and pose risks to people who live or recreate in the area. By far, the most difficult impacts from historical mining in the Basin to clean up relate to ecological protection. The impact to water quality from old mining waste is a long-term problem with no quick solution. If this work does not start now, it will continue to leave a legacy of mining impacts that will result in long-term environmental and human health risks for many more future generations. In addition, the failure to address the wide spread contamination in the Upper Basin may lead to the areas that have been cleaned becoming re-contaminated as well as the further spreading of contamination and people getting exposed to contaminants. This would be likely to limit the Basin's ability to reach its full potential for economic development and recreational opportunities.

### **How can the public provide input?**

EPA is accepting public comments on the "Proposed Plan" from July 12, 2010 through August 25, 2010. On August 4, 2010, EPA will hold a public meeting and an informal Open House to get people's input on the cleanup plan. You are encouraged to participate.

EPA has been working with the public, elected officials, and local groups throughout the development of the ROD Amendment, Implementation Plan, and Proposed Plan. EPA will continue to coordinate with these groups and the Basin Environmental Improvement Project Commission, its Technical Leadership Group (TLG), and Citizens' Coordinating Council (CCC). EPA will also continue to share information and seek community input on the ROD Amendment process and schedule. EPA encourages people interested in the Proposed Cleanup Plan to get involved through the Basin Commission and the TLG and CCC. EPA will give updates in its Basin Bulletin, in fact sheet mailers, and on EPA's web page (see below for the address). To get on the mailing list, call 1-800-424-4372, x0247.

### **What is the role of the Basin Commission?**

The Basin Environmental Improvement Project Commission (Basin Commission) is a local coordinating body created by Idaho state law. The Commission is in charge of developing cleanup work plans, sharing project information, giving technical advice, coordinating work with local priorities, and providing a forum for public participation in those decisions. It includes representatives from the federal government, the states of Idaho and Washington, the Coeur d'Alene Tribe, and three north Idaho counties. The Commission meets four times a year. The Basin Commission has been closely involved throughout the effort to amend the ROD, draft the Proposed Plan, and create an Implementation Plan. For more information, visit [www.basincommission.com](http://www.basincommission.com).

### **Will EPA really listen to my input?**

Yes. EPA needs your help to achieve its cleanup mandate. EPA wants the cleanup work to reflect local priorities and needs. EPA is required by law to protect human health and the environment. Your input will help EPA shape the Proposed Cleanup Plan and priorities to meet the legal requirements and local concerns. EPA will consider and respond to all comments received during the formal public comment period and public meeting. If you have questions or suggestions, contact the people listed at the end of this document. We want to hear from you. Your ideas are important to help design the Proposed Plan and guide the cleanup process.

### **How will EPA pay for the added cleanup activities?**

The recent legal settlement with Asarco will be an important source of funding for the cleanup. EPA has also been spending at least \$15 million per year for the human health cleanup, funded by our federal budget. As the residential yard cleanup work is completed, we will request the same funding levels for the ecologically-related cleanup actions. Many of these actions will also reduce human exposure to elevated metals.

**When will the ROD Amendment be completed?**

EPA expects it will be done in late 2010.

**Will the yard cleanup program continue?**

Yes. Cleaning up yards protects people’s health, a priority at the site. The lead risks are real and serious, and the agencies have a responsibility to address those risks. Yard cleanups continue in the Basin. In the Box, the residential cleanup was certified complete in 2008. The Idaho Department of Environmental Quality (DEQ) runs the cleanup program for Basin residential properties.

**What is remedy protection and why is it in the ROD Amendment?**

“Remedy protection” refers to actions which help protect areas that have been cleaned up—it’s about keeping clean areas clean. These actions include local drainage controls to ensure that clean gravel or soil barriers are not washed away or recontaminated. To date, EPA has addressed these types of issues property-by-property. In some instances, recontaminated barriers have been replaced by new clean barriers.

Although this approach has worked to date, EPA recognizes that it would be better to be more systematic about these types of recontamination problems. By being pro-active versus reactive, EPA intends to reduce the chance that clean barriers will be recontaminated by rainfall or tributary flooding. Based on field experience over the last fifteen years, input from local representatives, and hydrologic studies, EPA and DEQ have found ways to predict which areas are likely to get recontaminated. The ROD Amendment will propose a list of drainage control projects in the Upper Basin communities to help reduce recontamination potential. The ROD Amendment will also describe steps EPA and DEQ will take to identify similar remedy protection projects in the gulches outside the communities.

**Will upgrading roads be part of the ROD Amendment?**

No, because the existing RODs address the cleanup of right-of-ways in the Box and Basin, which include state, county, local and private roads. Local representatives have expressed concern that yard cleanup trucks have damaged roads. EPA and DEQ are concerned that deteriorating roads no longer act as protective barriers from underlying contaminants. EPA and DEQ will be looking for ways to work together to address this issue with local, county and state offices which provide and maintain roads in their communities.

**Will the ROD Amendment address flooding of the South Fork River and Pine Creek?**

Yes, EPA will commit, consistent with the ongoing Idaho Basin Commission effort, to work with all interested parties to address the issue of flooding. Flooding of the South Fork of the Coeur d’Alene River and Pine Creek is a large, system-wide problem. Understanding the flow and flooding characteristics of the South Fork River and identifying any areas that may require flood protection will require a large investment in time and dollars. Other federal and state agencies have jurisdiction and specialized expertise in flood control beyond EPA and DEQ. Several federal and state agencies, including those with the specialized expertise, as well as local groups, have a stake in the issue. EPA will work with the

diverse group of stakeholders that has been organized by the Idaho Basin Commission. EPA and DEQ are committed to participating in discussions, investigations and planning to better understand the best ways to reduce South Fork flooding in areas that could impact remedies in place.

**What about the Lower Coeur d’Alene Basin?**

At this time, EPA is not planning to identify more cleanup work in the Lower Basin. The Lower Basin is defined as the Coeur d’Alene River, floodplains, lakes and wetlands downstream from where the South Fork and North Fork Coeur d’Alene River meet the Lake. The existing cleanup plan for the Basin includes work in the Lower Basin. This work includes pilot projects in the Lower Basin like dredging, wetlands conversion, and streambank stabilization. Before doing those projects, EPA will develop a better understanding of sediment transport in the Lower Basin. This will allow EPA to minimize recontamination during the Lower Basin cleanup. Being able to understand and predict the transport of contaminated sediments will enable us to prioritize our work and look at performing more work, if necessary, in the Lower Basin. A ROD Amendment would be required to do additional work in the Lower Basin, but that will not be part the 2010 ROD Amendment. We anticipate a ROD Amendment in the Lower Basin in a few years.

**For More Information**

*Project Managers*

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*Or call toll-free at 1-800-424-4372*

**Documents**

Documents are available at select local libraries and on the webpage noted below.

**Webpage**

Find technical memos, meeting presentations, and community involvement documents at

<http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/bh+rod+amendment>

Or, <http://go.usa.gov/igD>