Coeur d'Alene Basin Five-year (2010-2014) Final Work Plan

INTRODUCTION

This plan for calendar years 2010-2014 covers environmental cleanup and improvement activities in the Coeur d'Alene Basin planned by the Basin Environmental Improvement Project Commission (BEIPC) and cooperating agencies and governments in accordance with responsibilities as stated in the Memorandum of Agreement establishing the BEIPC. This plan has been prepared by the Technical Leadership Group (TLG) and the Executive Director with review by the Citizen Coordinating Council (CCC), and is based on their recommendations for activities and work to be performed in CY 2010-2014. Annual work plans will address specific actions from this five-year plan. This proposed five-year work plan is organized as follows:

Part 1 – Remedial Work Funded with Superfund or Other Cleanup Monies

Part 2 – Other BEIPC Activities and Responsibilities

Part 1 includes work to implement the Operable Unit (OU) 3 Record of Decision (ROD) and amendments with funding provided by the U.S. Environmental Protection Agency (EPA's) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Superfund program or other environmental cleanup funding. The OU-3 ROD identifies remedial actions in the State of Idaho as well as cleanup actions in the State of Washington. For planning purposes a 30-year period of remediation was anticipated. Except for establishing the human health remedy as a top priority, the ROD does not address the sequence of actions.

Part 2 includes work and responsibilities the BEIPC has assumed based on recommendations from the National Academy of Sciences (NAS) Study and requests from the citizens and communities of the Basin.

PART 1 – REMEDIAL WORK FUNDED WITH SUPERFUND OR OTHER CLEANUP FUNDING

Funds made available through EPA's CERCLA appropriations are available for environmental remediation on privately owned lands and state, county and local government owned properties. EPA's appropriated CERCLA funds cannot be used for cleanup of sites on public (Federal) land. Work proposed on public lands is the responsibility of the federal land management agencies. The State of Idaho also supplies funding through the Idaho Department of Environmental Quality (IDEQ) for environmental cleanup activities.

For Part 1, the scope of the proposed five-year work plan corresponds generally to the level of funding and the funding sources anticipated over the five-year period, 2010-2014. The 2010-2014 Work Plan proposes a cleanup approach and a listing of priority activities for the 5-year planning period. The proposal includes the following work to be funded with Superfund or other cleanup monies:

- Repository Development and Management
- Residential and Community Property Remediation Including Private Drinking Water Supply
- Blood Lead Screening in Children
- Recreational Use Areas
- Ecological remedial actions in the Upper Basin
- Ecological remedial actions in the Lower Basin
- Basin Environmental Monitoring

Table 1-1 Summary of Remedial Activities Proposed for Implementation for 2010-2014

Proposed Activity	Scope	Objective	Lead Agency #
Repository	Repository activities center on	Continue to utilize BCR for	IDEQ
Development and	three objectives: (1) operations at	Upper Basin remediation and	EPA
Management	Big Creek Repository (BCR) and	Institutional Controls Program	PHD
	East Mission Flats Repository	(ICP) waste until it reaches	
	(EMF); (2) the search for a new	capacity and close. Continue	
	repository site in the Upper Basin;	operations at EMF for	
	and (3) development/revision of	remediation and ICP waste.	
	repository program guidance	Complete development of the	
	documents including the Waste	new Upper Basin repository.	
	Management Strategy (WMS) and	Complete development of the	
	Waste Acceptance Criteria	WMS and WAC. Develop	
	(WAC).	alternatives for disposal of	
		metals-contaminated soil	
		originating within the Area of	
		Contamination. The	
		alternatives for evaluation will	
		include methods beyond the	
		current practice of disposal at	
		repositories. The goal of this	
		task is to have viable	
		functional alternative in place	
		for the 2010 construction	
		season.	

Proposed Activity	Scope	Objective	Lead
Residential and Community Property Remediation including private Drinking Water Sources Blood Lead Screening in Children	Continue the residential and community property and private drinking water source remediation program for protection of human health as required by the ROD. Screening of children for elevated blood lead levels has been occurring annually in the CDA Basin since 1996 as a public health service. The purpose of the screening is to identify children with elevated blood lead levels and provide follow-up from a public health professional to identify ways to reduce lead exposures. The screening program also provides data to inform the Basin cleanup efforts. The cleanup action decisions are not based on annual blood lead testing results. Rather, the goal is to prevent lead exposures that could result in elevated blood lead levels.	Targeted property sampling substantially complete in 2010. Remediate about 700 properties per year and any needed private drinking water sources through 2011. Program should be substantially complete at the end of this 5 year plan. The blood lead screening program will continue in the same manner as it has in previous years. However, efforts will continue to be undertaken to explore ways to increase participation. EPA and IDEQ will engage local residents and partner agencies such as the Panhandle Health District, the Idaho Department of Health and Welfare, and the Agency for Toxic Substances and Disease Registry (ATSDR) to specifically discuss ways to increase participation in blood lead testing in the Basin. The agencies also will solicit input on public outreach activities that could be conducted in addition to the Basin Commission process to increase participation in the Bunker Hill annual blood lead testing program.	IDEQ PHD

Proposed Activity	Scope	Objective	Lead Agency #
Recreational Use Areas	Develop a Basin Recreational Management Strategy and Guidelines Document. Remediate identified recreation areas or develop substitute clean areas along the CDA River.	Further update the comprehensive inventory of contaminated recreation use areas. Review operational plans for each recreation agency to identify commonalities that could be incorporated into an area wide recreation management guideline or strategy. Work with the Communications PFT to identify what else can be done to make recreation users aware of human health risks along the river corridor and to further educate people on how to minimize any risks.	EPA with state and federal agencies and CDA Tribe

Proposed Activity	Scope	Objective	Lead Agency #
Activity Upper Basin Ecological Remedies	Evaluate OU-2 and Upper Basin OU-3 ecological cleanup alternatives to develop a comprehensive cleanup plan to be included in a ROD amendment for the Upper Basin which includes the South Fork Coeur d'Alene River basin and its tributaries downstream to the confluence with the North Fork. Address National Academy of Sciences recommendations, to incorporate improved knowledge of the Upper Basin and OU-2, and to move forward on a systematic, cost-effective approach to cleanup activities.	Identify and select additional remedial actions for the Upper Basin and Box in a ROD amendment. Evaluate selected cleanup actions and make modifications to existing decision documents. The ROD amendment will provide a priority list of cleanup actions in the Upper Basin and Box that will be completed as funds become available. The priority setting process will be documented in an Implementation Plan that compliments the ROD Amendment. This process will help ensure that the most effective actions are taken first. Goal is to issue the amendment for OU-2 and OU-3 Upper Basin in 2010.	Agency # EPA and IDEQ with supporting agencies and CDA Tribe.

Proposed Activity	Scope	Objective	Lead Agency #
Lower Basin Ecological Remedies	Evaluate and prioritize potential ecological remedies noted in the ROD comparing RI/FS data with new data from CWA projects and other sources. Ensure that remedies are coordinated with natural resource restoration activities.	Finalize the development of an Enhanced Conceptual Site Model (ECSM) for the Lower Basin. The ECSM will serve to refine the current understanding of the Lower Basin with respect to river flows and sediment transport. Fill critical data gaps to facilitate the development of a computational model in the future. Data collection will be a multi-year effort with the focus on filling the most critical data needs first. The sequencing and evaluation of cleanup actions in the Lower Basin will receive greater focus as human health cleanup and water quality issues in the Upper Basin are addressed. Develop a computational model to assist in understanding contaminated sediment transport for the purposes of remedial actions evaluation and prioritization.	EPA, IDEQ, USFWS and CDA Tribe

Proposed Activity	Scope	Objective	Lead Agency #
Basin	Continue to implement long-term	Integrate existing plans into a	EPA
Environmental	monitoring and make results	consolidated CDA Basin	working
Monitoring	available via the new WQX data	environmental monitoring	with other
	management system. The site	plan (BEMP). This process	agencies
	environmental monitoring data	will utilize existing	including
	will be accessible at	quantitative and qualitative	IDEQ,
	www.bunkerhilldata.org. The	tools to evaluate & optimize	USFWS,
	biological monitoring data and	the current program. This	and USGS
	annual monitoring reports are also	overall effort is also consistent	and the
	accessible at EPA's web page	with the efforts underway to	CDA
	under Technical Documents at	develop a Comprehensive	Tribe.
	http://yosemite.epa.gov/R10/CLE	Ecological Cleanup Plan.	
	ANUP.NSF/sites/cda Implement	The major goal of the current	
	remedial action effectiveness	and revised BEMP is to	
	monitoring as appropriate.	monitor and evaluate the	
		progress of the remedy in	
		terms of improving ecosystem	
		conditions.	

Note with planning and implementation of remedial activities, lead agencies will coordinate with federal, state, tribal and local agencies as appropriate.

PART 2 – OTHER BEIPC ACTIVITIES AND RESPONSIBILITIES

For Part 2, the scope of the five-year work plan includes a number of work items that the BEIPC has elected to become involved in and items of work needed to accommodate some of the recommendations of the NAS study. The plan includes the following work:

- Lake Management Activities
- Funding for the Environmental Cleanup, Remedy Protection, and Infrastructure Revitalization
- Communications and Public Involvement
- Natural Resource Damage Restoration

2.1 LAKE MANAGEMENT ACTIVITIES

The OU-3 ROD did not include CDA Lake in the Selected Remedy. The ROD anticipated that the State, Tribe, federal agencies, and local governments would implement a Lake Management Plan (LMP) outside the Superfund process using separate regulatory authorities.

The updated LMP has been prepared and approved for implementation. Implementation of the 2009 LMP will be an adaptive management process and adjustments may be necessary as monitoring and other data are obtained and analyzed.

As referenced in Subsection 4.5.1 of the 2009 LMP, many of the agencies, governments, and other stakeholders that address water quality in CDA Lake are represented on the BEIPC, TLG or CCC. As such these various BEIPC forums represent unique opportunities for LMP coordination and implementation which IDEQ and the Tribe intend to fully utilize.

Examples of coordination activities envisioned for implementation of the 2009 LMP include, but are not limited to the following:

- 1. Provide routine updates on implementation activities at each BEIPC meeting with the intention to coordinate with agencies/governments represented on the Commission;
- 2. Engage nutrient management partners on the TLG to review Management Action Table (MAT) activities and work to better understand how to develop partnerships and joint plans for nutrient reduction projects;
- 3. Present draft yearly monitoring plans for TLG review and comment and present yearly monitoring results;
- 4. Present draft annual work plans to the TLG for review and comment; and
- 5. Provide an annual overview of LMP implementation activities to the CCC and solicit their input.

This level of coordination within the BEIPC will maximize opportunities for information exchange and advice working under the BEIPC MOA and work plans.

2.2 FUNDING FOR THE ENVIRONMENTAL CLEANUP AND INFRASTRUCTURE REVITALIZATION

Funding for the human health element of the Superfund (CERCLA) remedy is currently provided by the EPA and the States on private and state lands. The Federal Land Management agencies are currently providing funding for human health and ecological system cleanup actions on federally managed lands. Funding for EPA to implement the remedies in OU-2 and 3 is currently prioritized on implementation of the Human Health protection. Funding for the infrastructure revitalization activities is currently being addressed in the Drainage Control Infrastructure Revitalization Plan (DCIRP) process.

There continues to be a great deal of discussion and concern expressed over the lack of funding sources in the future for implementation of the ecological remedy in OU-2 and 3 and implementation of the DCIRP. The Funding PFT developed a potential funding source spread sheet in fall 2008 for use in securing funding for the DCRIP and flood prevention programs. The funding acquisition work will include prioritization of systems segments, the study and determination of the best processes for rehabilitation, and preparation of preliminary designs and estimates to support efforts in meetings with local governments, taxing districts boards, local stakeholders and the general public. The BEIPC will assist Upper Basin communities and utilities in pursuing funding to implement the DCIRP and flood control efforts to upgrade and certify the levee system.

Federal funding of CERCLA activities on state and private lands outside of the EPA's appropriation for CERCLA is not allowed, but the PFT will continue to investigate opportunities to fund these activities from other sources.

2.3 COMMUNICATIONS AND PUBLIC INVOLVEMENT

During 2010, the Communications PFT will continue to address issues concerning the strengthening of public involvement and education in BEIPC activities and communication between the Basin community and the BEIPC and CERCLA cleanup and natural resource restoration implementing agencies. The CCC will continue to be the focus organization to assist in implementing this process.

Following is a partial listing of communications and public involvement work items:

- Work with the Executive Director on requests for presentations to public groups.
- Conduct audience analysis for reworking the BEIPC tri-fold brochure produced by the Communications PFT in 2008 and revised in 2009.
- Produce communications pieces for possible mass distribution and target audiences.
- Provide assistance to BEIPC groups and staff who are making verbal or written public presentations on issues such as information sessions; Op-Eds, news articles, public releases, display ads, etc.
- Continue to update avenues of outreach in the CDA Basin.
- Examine alternative communication tools such as local radio, television, and workshops, etc.
- Develop involvement categories to structure communication/outreach activities.
- Continue efforts on increasing public attendance at meetings and provide assistance when requested at other CDA Basin or agency related events such as open houses, etc.
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2.4 NATURAL RESOURCE DAMAGE RESTORATION

CERCLA natural resource trustees in the Coeur d'Alene Basin are the United States, represented by the U.S. Forest Service, U.S. Fish & Wildlife Service and U.S. Bureau of Land Management, the Coeur d'Alene Tribe, and the State of Idaho. In 2007, the federal and tribal trustees, who comprise the Coeur d'Alene Basin Natural Resource Trustees (Trustees) selected the preferred alternative for the final interim restoration plan and environmental assessment. The State of Idaho adopted the Trustee's preferred alternative. The projects under the selected alternative of the Trustees' interim restoration plan will be implemented using funds that the Trustees have recovered through CERCLA natural resource damage settlements with potentially responsible parties, or other funding as available for the purpose of natural resource restoration. The Trustees continue to coordinate with the BEIPC as the Trustees move toward implementing the projects under the Trustees' interim restoration plan. The BEIPC and the Trustees are continuing to improve coordination regarding Basin remediation and restoration projects.