Interim
Record of Decision (ROD) Amendment, Upper Basin of the Coeur d'Alene River

Bunker Hill Mining
and Metallurgical Complex
Superfund Site

Part 3 Section 4.0
Responses to Individual Comments

United States
Environmental Protection
Agency Region 10

August 2012

Responses to Individual Comments

This section presents EPA's responses to individual comments received on the Proposed Plan. EPA received comments in various forms including letters, emails, and oral testimony at community meetings. The comments and EPA's responses are organized into the following attachments (the attachments are provided in electronic format):

- **Attachment A**: Index of Commenters and Responses
- **Attachment B**: Master Comment List
- **Attachment C**: Responses to Federal Agency Comments
- **Attachment D**: Responses to State Agency Comments
- **Attachment E**: Responses to Native American Tribe Comments
- **Attachment F**: Responses to Local Jurisdiction Comments
- **Attachment G**: Responses to Local Community/Special Interest Organization Comments
- **Attachment H**: Responses to Business Comments
- **Attachment I**: Responses to Individual Comments

Attachment A presents an Index of all comments sorted in two methods. First, all commenters are listed alphabetically by the last name of the person or the organization providing the comments. It provides the locations (Attachment and page number) of the comments and EPA's responses. Second, all comment are listed alphabetically/numerically by the comment number, along with the locations of the comments and responses.

Many comments address similar issues. In these cases, the response for a given issue is provided once. Responses to later comments on the same issue refer to the master comment list where this response is provided. These responses are referred to as "master comment responses" and are found in Attachment B. When using Attachment B, the user may find that the referenced response addresses more issues than he or she raised. In these cases, it is expected that the user will be able to identify those parts of the referenced response that apply. In other cases, a comment may raise multiple issues. In such cases, the user may be referred to several master comment responses for a complete response to all issues raised. An overview of the issues raised and EPA's responses is provided in Part 3, Section 3.0, Responsiveness Summary.

In Attachments C through I, the comments and responses are sorted alphabetically by the last name of the commenter. Each comment letter, email, and oral testimony comment was assigned a unique identification number (e.g., 1365213). Each comment was assigned a unique comment number (e.g., LJ36-1). Many commenters submitted more than one comment letter. In these cases, a separate identification number and comment number were assigned for each set of comments. This approach helped EPA ensure that all comments were addressed.

In Attachments C through I, an image of the original comment is shown on the left side of the page and includes EPA's delineation. The right side of the page presents EPA's response to that comment.

A number of commenters' names were illegible, and these commenters are listed as "Unknown." EPA has included their comments in Attachment I and has responded to the comments where possible.

As provided in the CERCLA statute, Section 117(b), EPA is only responsible for providing responses to each of the "significant" comments, criticisms, and new data. Comments not meeting this statutory criterion have nonetheless been recorded in this section, and responses have been provided to the extent possible.

ATTACHMENT I

Responses to Individual Comments

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Unknown, Unknown, I795, Letter 1365173 ..... I-1127
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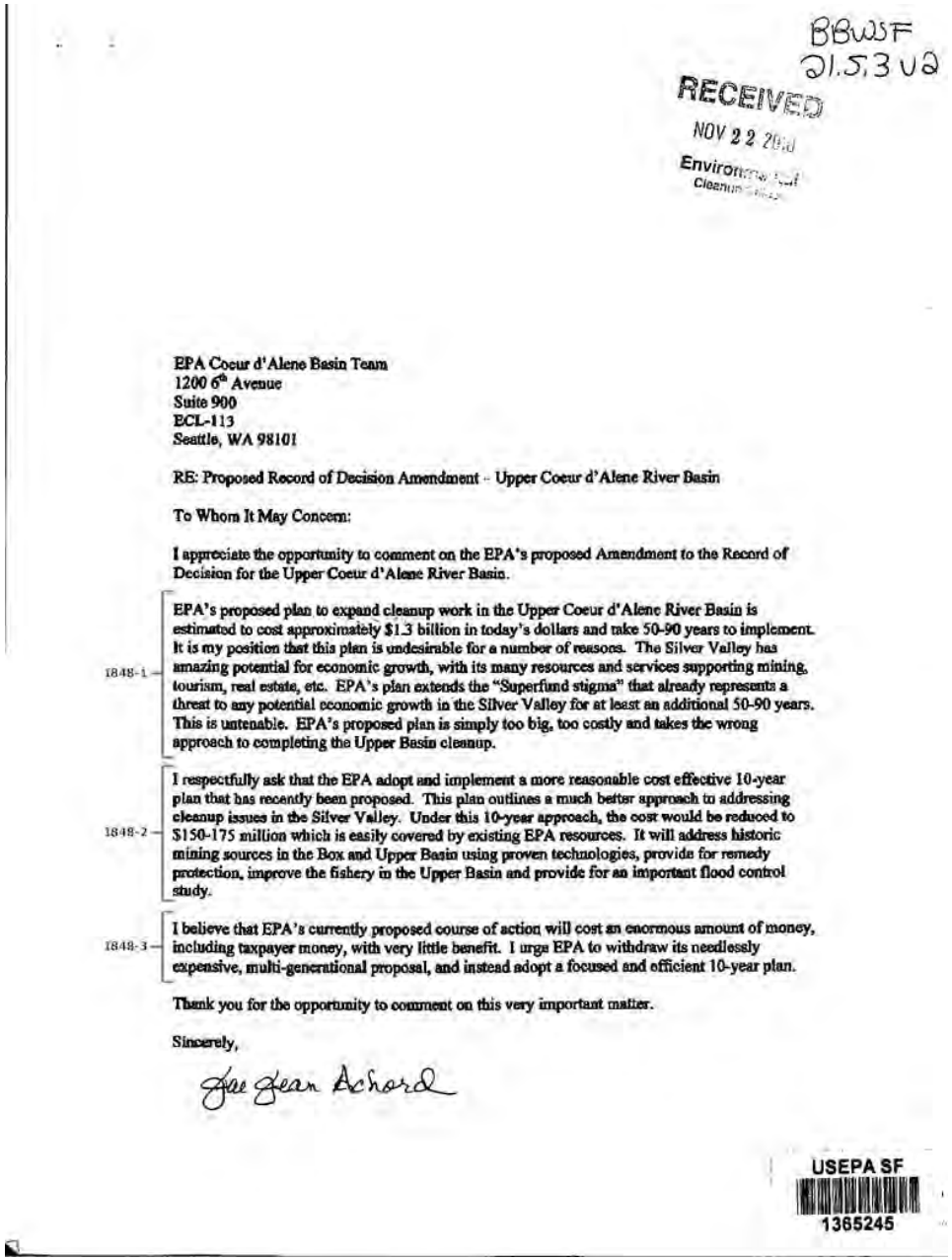
Achord, Jae Jean, I848, Letter 1365245



BBWSF
21.53 U2

RECEIVED
NOV 22 2010
Environmental
Cleanup

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I848-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I848-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I848-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Jae Jean Achord

USEPA SF
1365245

Response to comment I848-1

See response to Comment No. I474-1.

Response to comment I848-2

See response to Comment No. I474-2.

Response to comment I848-3

See response to Comment No. I474-3.

Achord, Steve, I547, Letter 617543

ROD
Sue Achord
to:
CDABasin
11/22/2010 07:26 PM
Cc:
"Steve Achord"
Show Details

I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I547-1

My Concerns
Timeline -- The EPA plan of 50-90 years is too long
Economic Impacts -- The plan will have a negative impact on development in the Silver Valley
Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature
Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars)
Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley
Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete
Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water
Stream & Fishery Impacts -- This plan could eliminate or reduce water flows.
States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high
National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations

617543

Response to comment I547-1

See response to Comment No. I351-1.

Achord, Sue, I548, Letter 617544

ROD
Sue Achord
to:
CDABasin
11/22/2010 07:18 PM
Show Details

EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I548-1

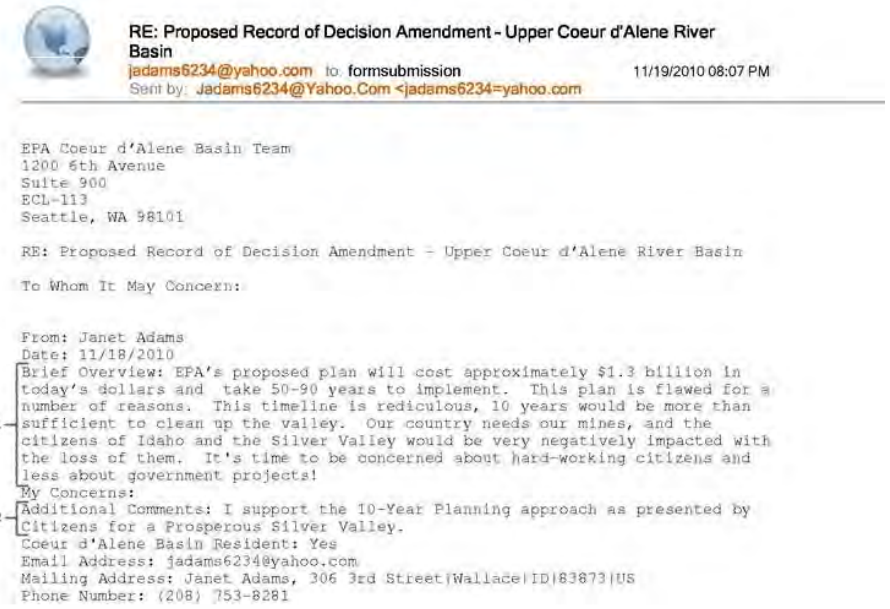
My Concerns
Timeline -- The EPA plan of 50-90 years is too long
Economic Impacts -- The plan will have a negative impact on development in the Silver Valley
Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature
Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars)
Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley
Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete
Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water
Stream & Fishery Impacts -- This plan could eliminate or reduce water flows.
States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high
National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations.
I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

617544

Response to comment I548-1

See response to Comment No. I351-1.

Adams, Janet, I524, Letter 617265



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jadams6234@yahoo.com to formsubmission 11/19/2010 08:07 PM
Sent by: Jadams6234@Yahoo.Com <jadams6234=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Janet Adams
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. This timeline is rediculous, 10 years would be more than sufficient to clean up the valley. Our country needs our mines, and the citizens of Idaho and the Silver Valley would be very negatively impacted with the loss of them. It's time to be concerned about hard-working citizens and less about government projects!
I524-1
My Concerns:
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
I524-2
Coeur d'Alene Basin Resident: Yes
Email Address: jadams6234@yahoo.com
Mailing Address: Janet Adams, 306 3rd Street|Wallace|ID|83873|US
Phone Number: (208) 753-8281

617265

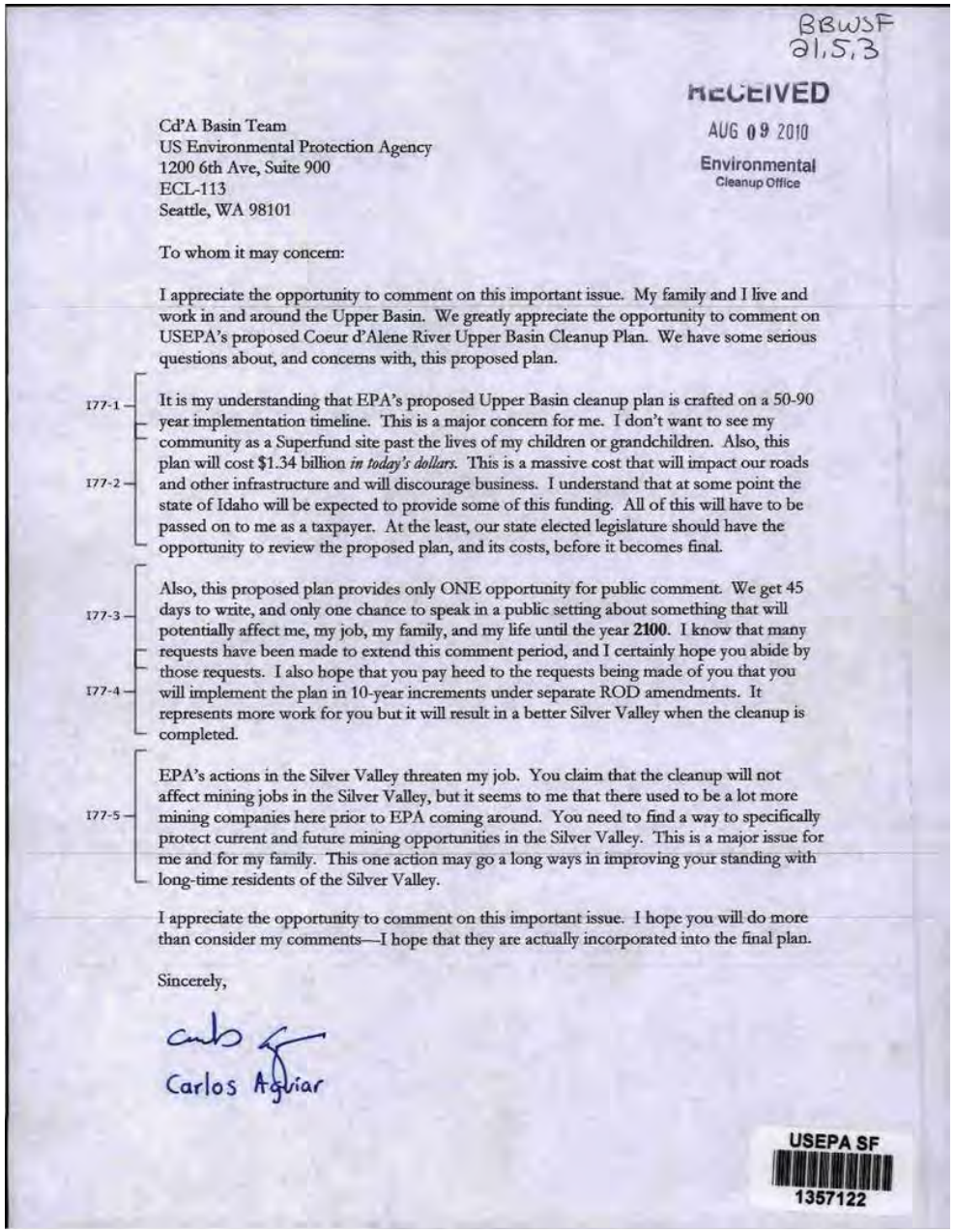
Response to comment I524-1

See responses to Comment Nos. I58-1, I58-2, and I58-3.

Response to comment I524-2

See response to Comment No. I474-2.

Aguiar, Carlos, I77, Letter 1357122



BBWSF
21,5,3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I77-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I77-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I77-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I77-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I77-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Carlos Aguiar

USEPA SF
1357122

Response to comment I77-1
See response to Comment No. I58-1.

Response to comment I77-2
See response to Comment No. I58-2.

Response to comment I77-3
See response to Comment No. I58-3.

Response to comment I77-4
See response to Comment No. I58-4.

Response to comment I77-5
See response to Comment No. I58-5.

Albright, Wayne, I347, Letter 616231

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
woodsrider@cableone.net to: formsubmission 11/13/2010 07:44 AM
Sent by: Woodsrider@Cableone.Net <woodsrider=cableone.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Wayne Albright
Date: 11/13/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: woodsrider@cableone.net
Mailing Address: 938 Kodiak Lane|Lewiston|ID|83501|US
Phone Number:

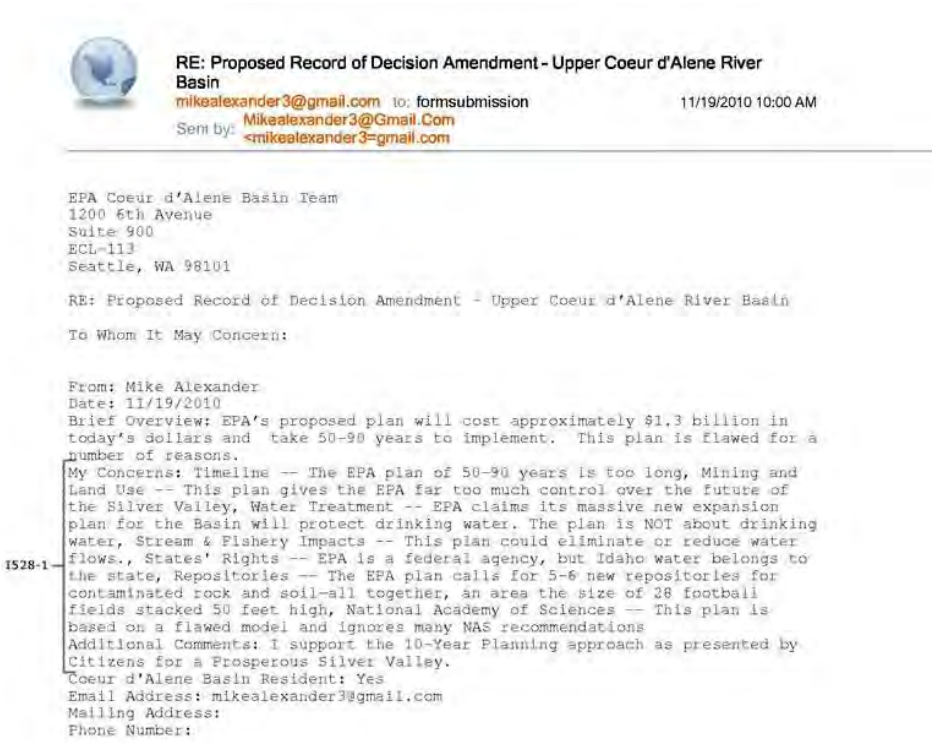
I347-1

616231

Response to comment I347-1

See response to Comment No. I351-1.

Alexander, Mike, I528, Letter 617269



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

mikealexander3@gmail.com to: formsubmission 11/19/2010 10:00 AM

Sent by: Mikealexander3@Gmail.Com <mikealexander3=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Mike Alexander
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: mikealexander3@gmail.com
Mailing Address:
Phone Number:

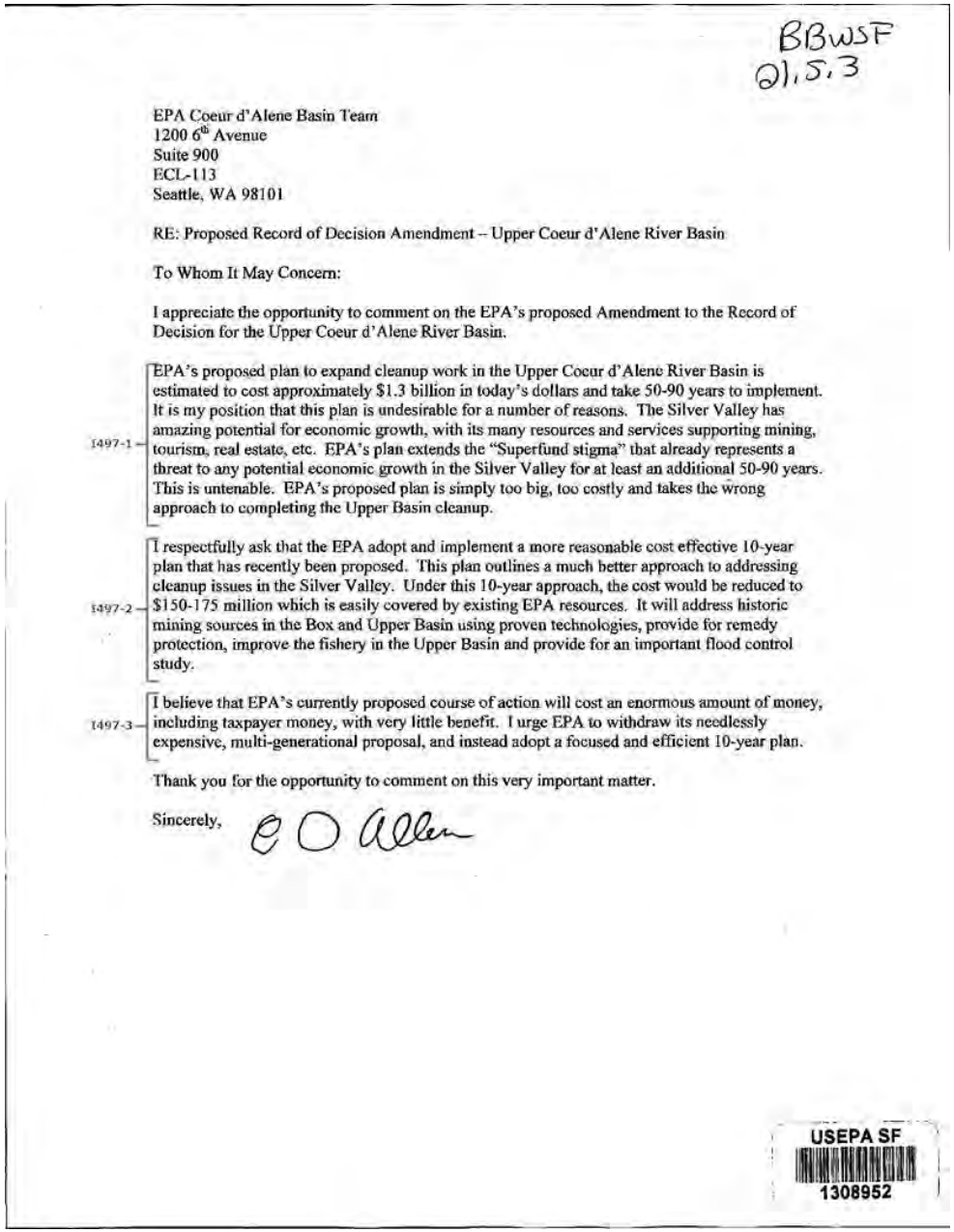
I528-1

617269

Response to comment I528-1

See response to Comment No. I351-1.

Allen, C.O., I497, Letter 1308952



BBWSF
2.1.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I497-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I497-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I497-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely, C O Allen

USEPA SF
1308952

Response to comment I497-1
See response to Comment No. I474-1.

Response to comment I497-2
See response to Comment No. I474-2.

Response to comment I497-3
See response to Comment No. I474-3.

Allen, Kip, I549, Letter 617545

Allen, Kip
to:
CDABasin
11/23/2010 03:56 PM
Show Details

Page 1 of 3
November 23, 2010
Coeur d'Alene Basin Team
EPA
1200 6th Avenue, Suite 900
ECL-113
Seattle, WA 98101
cdabasin@epa.gov
Re: Proposed Cleanup Plan for the Upper Coeur d'Alene Basin
Ladies and Gentlemen:

I549-1

I have been involved with mining for 35 plus years. Mining have evolved to the point that stewardship of the lands is a high priority. I know my involvement emphasizes the need for good responsible mining.

I want to go on record today in opposition to EPA's proposed cleanup plan for the Upper Coeur d'Alene Basin ("Proposed Plan").

Hard-rock mining is critical to the health of North Idaho's current economy and the area's future economic development. It also is very important to the state's overall economy as well as the national economy, as Silver Valley silver production accounts for 15% of the total annual production nationwide. According to the Idaho Department of Labor, the average wage for all industries in Shoshone County is approximately $31, 600 a year, while the average wage in the mining industry is approximately $60,500 a year. The folks actually doing the mining make about $100,000 a year including benefits. Mining jobs account for more than 10% of total employment in Shoshone County. The economic impact of mining includes the many suppliers and contractors that provide the important materials and services to the industry. It is critically important that any EPA cleanup plan for the Upper Basin encourage and support additional mining-related investment, especially now when demand for metals is so high.

Mining activities in Idaho are subject to stringent environmental regulation. There is no need or legal basis to expand CERCLA beyond its legislative intent to include hazardous waste site cleanup in the regulations for active mining operations. It is important to keep in mind that modern hardrock mines are designed to limit the environmental harms that might lead to a CERCLA NPL designation. It is largely legacy hardrock sites, which were not designed for closure and reclamation that are on the NPL. EPA's proposal will disadvantage both mining operations (existing and prospective) and mining investment in North Idaho vis-à-vis mining operations elsewhere in the country (and the world for that matter). In addition, the Proposed Plan will effectively shift land use planning and decision making authority from local people to a federal agency, and in so doing, will significantly handicap North Idaho's ability to develop its natural resources at a time when conditions are otherwise prime for new investment. The

IMA – November 23, 2010
Page 2 of 3

Proposed Plan also ignores critically important state sovereignty and regulatory imperatives relative to water rights. All of these outcomes are unacceptable and unwarranted.

617545

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Response to comment I549-1

This letter is nearly identical to the letter submitted by the Idaho Mining Association. Please see responses to Document No. LC28 for responses to the Idaho Mining Association's comments.

Starting with the implications for mining, the Proposed Plan will, for the first time, set stringent closure requirements for active tailings ponds that are in compliance with current law and regulatory requirements. This will set an unprecedented and arbitrary double standard for regulation of Silver Valley mining vs. mining elsewhere, to the serious economic disadvantage of the Silver Valley. EPA also says it will only allow new mining activity if it does not "impede" its cleanup plans. This approach is quite clearly intended to make EPA's cleanup plans a higher priority than anyone else's plans, for mining or any other development, effectively putting control of North Idaho's mining economy and economic future in EPA's hands. EPA simply is not justified or authorized to exercise this sort of control.

Similarly, EPA's Proposed Plan implicates and impinges on local land use control authorities. It is a fundamental tenet under our federal system that land use decision making is the right and responsibility of local governments, with some limited role for the State perhaps, but certainly not ever a federal prerogative. The Proposed Plan will undo those rules in the Silver Valley. As noted earlier, it is the Proposed Plan that will control local decision making on economic development. The EPA will need much of the flat ground in the Upper Basin, including existing tailings impoundments, for repository space, leaving little flat ground for any future revenue generating opportunities. EPA also plans to build miles of drains and plumbing along the South Fork and any new development presumably will be precluded unless that development is acceptable to EPA.

The Proposed Plan withdraws huge quantities of water in the Upper South Fork of the Coeur d' Alene River and its tributaries above Elizabeth Park for treatment that will have significant impacts on the river and, by extension, on water rights in the Upper South Fork. Those rights are currently in adjudication, pursuant to State law. Is EPA planning to acknowledge State law and participate in that adjudication? EPA's proposed withdrawals would also trigger State permitting requirements, and possibly even require approval by the Idaho Legislature. EPA's proposed withdrawals will also be subject to Idaho's conjunctive management rules and EPA will need to prove these withdrawals will not injure existing water rights. The Proposed Plan is silent on these very important considerations in addressing the feasibility and implementability of EPA's proposal. EPA also ignores the impact its proposal will have on the ability of Upper Basin industrial and municipal water dischargers that have NPDES permits to meet discharge limits on this stretch of river.

1549-1

EPA's plan is simply too big, too costly and not well thought out. There are also serious questions about whether what EPA proposes is legally permissible or implementable. EPA should instead adopt a realistic and cost-effective 10-year planning approach along the lines of the alternative 10-Year Plan that has been offered in response to EPA's proposal. That plan presents a data-driven, cost-effective approach to remediating high priority historic mining sites with proven technologies that have a high probability of success. At the end of 10 years, cleanup goals and remaining cleanup needs can be evaluated in light of the progress to date. Among other things, the 10-Year Plan respects the limits of federal authority, respects the role and

IMA – November 23, 2010

importance of mining in the Valley and the rights and freedom of Silver Valley residents to direct their future.

In addition, I have reviewed the comments of the Northwest Mining Association (NWMA) dated November 23, 2010, in particular the comments on the Proposed Plan prepared by ARCADIS U.S., Inc., wherein ARCADIS concludes that the Proposed Plan:

I549-1

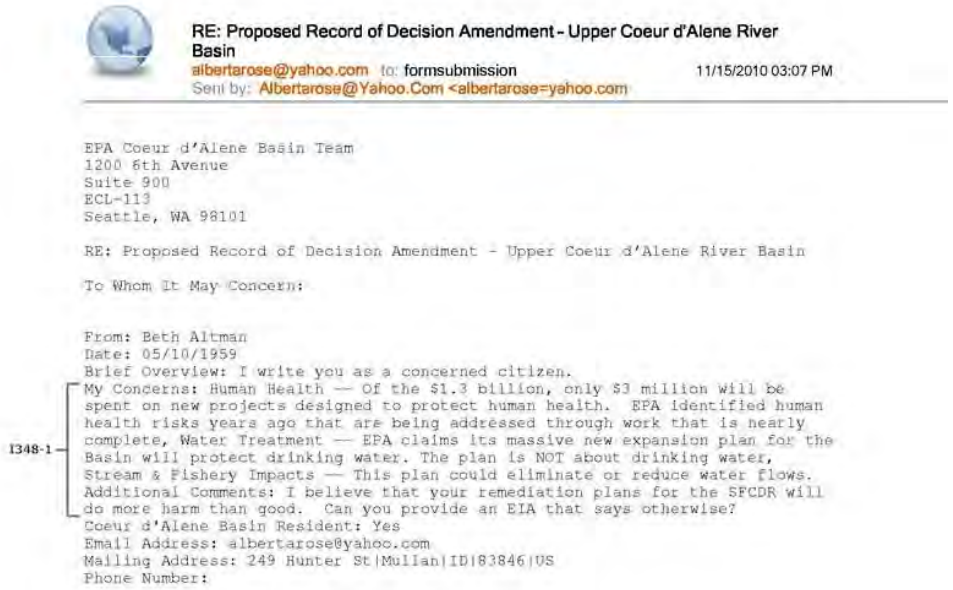
- ☐ encompasses too large of an area,
- ☐ fails to meet ARARs,
- ☐ prescribes remedial activities that are not implementable at costs that are proportional to benefits,
- ☐ does not demonstrate effectiveness, including protectiveness, over a reasonable amount of time, and
- ☐ is not compliant with the NCP in other ways.

ARCADIS further concludes that the phased 10-year plan is a much more reasoned approach and is both more protective and cost-effective at addressing the critical sources of contamination within a manageable time frame. I fully endorse the ARCADIS comments and incorporate them by reference into this comment letter.

Very truly yours,

Kip S Allen
Pipeline/ Safety Leadperson
CECM
Work 208 547 0404
Cell 208 221 6856
Bringing Earth's Resources to Life
If it can't be Grown, It's got to be Mined. If it's Grown, It requires Mining

Altman, Beth, I348, Letter 616232



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
albertarose@yahoo.com to: formsubmission 11/15/2010 03:07 PM
Sent by: Albertarose@Yahoo.Com <albertarose=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Beth Altman
Date: 05/10/1959
Brief Overview: I write you as a concerned citizen.
I348-1 My Concerns: Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows.
Additional Comments: I believe that your remediation plans for the SFCDR will do more harm than good. Can you provide an EIA that says otherwise?
Coeur d'Alene Basin Resident: Yes
Email Address: albertarose@yahoo.com
Mailing Address: 249 Hunter St|Mullan|ID|83846|US
Phone Number:

616232

Response to comment I348-1

See response to Comment No. I351-1.

Ames, Darlene, I349, Letter 616233

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
rockrake@q.com to: formsubmission 11/15/2010 09:23 AM
Sent by: Rockrake@Q.Com <rockrake=q.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Darlene Ames
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. When those in WA DC try to plan for States they generally are more expensive and less effective than those plans made be the states inconjunction with the federal agency involved.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts — The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I349-1

This logical plan is less expensive and would be implemented in a much more timely fashion, to the benefit of those who live in the region as well as the federal tax payer.

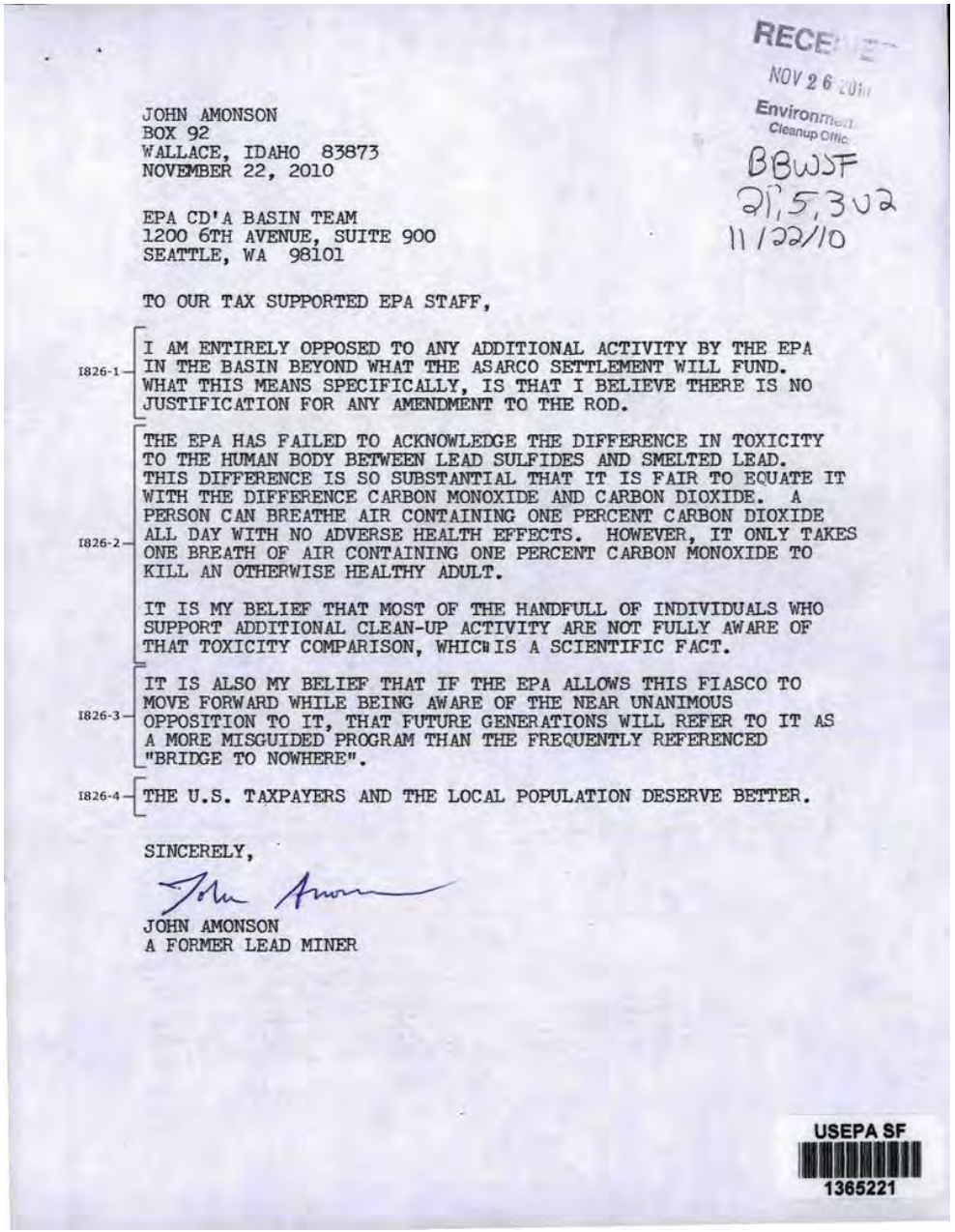
Let's forget the power struggle and just do the RIGHT thing NOW!
Coeur d'Alene Basin Resident: No
Email Address: rockrake@q.com
Mailing Address: 1082 Valley Street|Middleton|ID|83644|US
Phone Number:

616233

Response to comment I349-1

See response to Comment No. I351-1.

Amonson, John, I826, Letter 1365221



RECEIVED
NOV 26 2010
Environmental Cleanup Office
BBWJF
21,5,3v2
11/22/10

JOHN AMONSON
BOX 92
WALLACE, IDAHO 83873
NOVEMBER 22, 2010

EPA CD'A BASIN TEAM
1200 6TH AVENUE, SUITE 900
SEATTLE, WA 98101

TO OUR TAX SUPPORTED EPA STAFF,

I826-1 I AM ENTIRELY OPPOSED TO ANY ADDITIONAL ACTIVITY BY THE EPA IN THE BASIN BEYOND WHAT THE ASARCO SETTLEMENT WILL FUND. WHAT THIS MEANS SPECIFICALLY, IS THAT I BELIEVE THERE IS NO JUSTIFICATION FOR ANY AMENDMENT TO THE ROD.

I826-2 THE EPA HAS FAILED TO ACKNOWLEDGE THE DIFFERENCE IN TOXICITY TO THE HUMAN BODY BETWEEN LEAD SULFIDES AND SMELTED LEAD. THIS DIFFERENCE IS SO SUBSTANTIAL THAT IT IS FAIR TO EQUATE IT WITH THE DIFFERENCE CARBON MONOXIDE AND CARBON DIOXIDE. A PERSON CAN BREATHE AIR CONTAINING ONE PERCENT CARBON DIOXIDE ALL DAY WITH NO ADVERSE HEALTH EFFECTS. HOWEVER, IT ONLY TAKES ONE BREATH OF AIR CONTAINING ONE PERCENT CARBON MONOXIDE TO KILL AN OTHERWISE HEALTHY ADULT.

IT IS MY BELIEF THAT MOST OF THE HANDFULL OF INDIVIDUALS WHO SUPPORT ADDITIONAL CLEAN-UP ACTIVITY ARE NOT FULLY AWARE OF THAT TOXICITY COMPARISON, WHICH IS A SCIENTIFIC FACT.

I826-3 IT IS ALSO MY BELIEF THAT IF THE EPA ALLOWS THIS FIASCO TO MOVE FORWARD WHILE BEING AWARE OF THE NEAR UNANIMOUS OPPOSITION TO IT, THAT FUTURE GENERATIONS WILL REFER TO IT AS A MORE MISGUIDED PROGRAM THAN THE FREQUENTLY REFERENCED "BRIDGE TO NOWHERE".

I826-4 THE U.S. TAXPAYERS AND THE LOCAL POPULATION DESERVE BETTER.

SINCERELY,

John Amonson

JOHN AMONSON
A FORMER LEAD MINER

USEPA SF
1365221

Response to comment I826-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Also see response to Comment No. L295-3.

Response to comment I826-2

EPA and other agencies have done many studies over the years that document lead speciation and bioavailability in the Upper Basin. Results from these studies were considered in the development and evaluation of remedial alternatives. As to human health risks in the Basin, see the response to Comment No. I295-1.

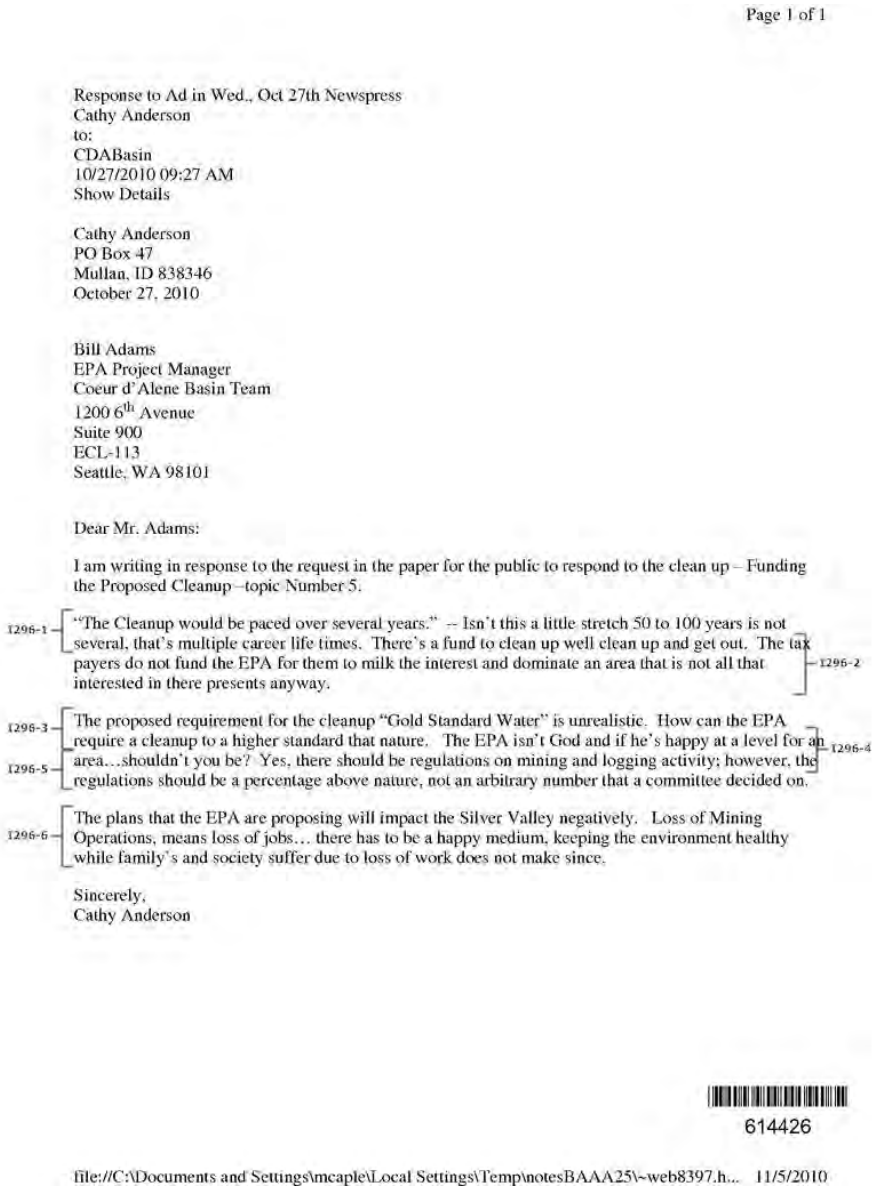
Response to comment I826-3

Comment noted.

Response to comment I826-4

Comment noted.

Anderson, Cathy, I296, Letter 614426



Page 1 of 1

Response to Ad in Wed., Oct 27th Newspress
Cathy Anderson
to:
CDABasin
10/27/2010 09:27 AM
Show Details

Cathy Anderson
PO Box 47
Mullan, ID 838346
October 27, 2010

Bill Adams
EPA Project Manager
Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

Dear Mr. Adams:

I am writing in response to the request in the paper for the public to respond to the clean up – Funding the Proposed Cleanup –topic Number 5.

I296-1 "The Cleanup would be paced over several years." -- Isn't this a little stretch 50 to 100 years is not several, that's multiple career life times. There's a fund to clean up well clean up and get out. The tax payers do not fund the EPA for them to milk the interest and dominate an area that is not all that interested in there presents anyway. I296-2

I296-3 The proposed requirement for the cleanup "Gold Standard Water" is unrealistic. How can the EPA require a cleanup to a higher standard that nature. The EPA isn't God and if he's happy at a level for an I296-4
I296-5 area…shouldn't you be? Yes, there should be regulations on mining and logging activity; however, the regulations should be a percentage above nature, not an arbitrary number that a committee decided on.

I296-6 The plans that the EPA are proposing will impact the Silver Valley negatively. Loss of Mining Operations, means loss of jobs… there has to be a happy medium, keeping the environment healthy while family's and society suffer due to loss of work does not make since.

Sincerely,
Cathy Anderson

614426

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web8397.h... 11/5/2010

Response to comment I296-1

Please see Response to Comment No. I58-1.

Response to comment I296-2

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. See response to Comment No. I295-3.

Response to comment I296-3

EPA is required by Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to carry out the cleanup to meet applicable or relevant and appropriate requirements (ARARs) unless these are waived. The ARARs for protection of the environment in the Upper Basin are the site-specific surface water quality standards for cadmium, lead, and zinc developed by the State of Idaho (Idaho Administrative Procedures Act [IDAPA] 58.01.02.285). The site-specific criteria for lead and zinc are higher than the federal and state-wide criteria for protection of aquatic life, although they have been demonstrated to provide a comparable level of protectiveness within the SFCDR Watershed. The site-specific cadmium criterion is lower than the federal and state criteria. See response to Comment No. LC33-8 regarding background concentrations in the Coeur d'Alene Basin.

Response to comment I296-4

Comment noted.

Response to comment I296-5

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediments, groundwater, and surface water that poses risks to people, wildlife, and the environment. The levels of contamination significantly exceed regulatory and site-specific water quality standards. See response to Comment No. LC33-8 regarding background metals levels in the Coeur d'Alene Basin.

Response to comment I296-6

See response to Comment No. I58-5.

Anderson, Charleen, I362, Letter 616248

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
sallya92825@yahoo.com to: formsubmission 11/12/2010 10:10 AM
Sent by: Sallya92825@Yahoo.Com <sallya92825=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

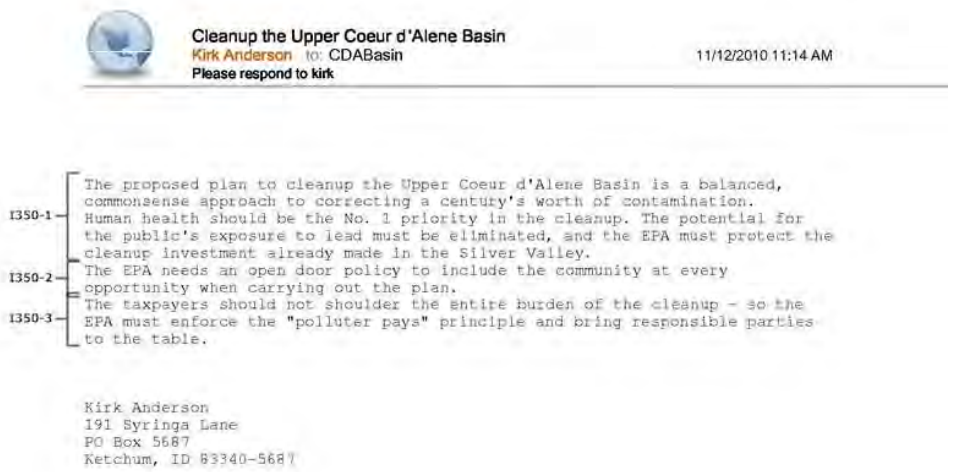
From: Charleen Anderson
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I do not have any confidence in plans made by people who do not live in the affected area, local live with it
I362-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: sallya92825@yahoo.com
Mailing Address: C. M. Anderson, 5363 W Lockport Dr|Boise|ID|Boise, ID 83703|US
Phone Number: (208) 384-1599

616248

Response to comment I362-1

See response to Comment No. I351-1.

Anderson, Kirk, I350, Letter 616234



Cleanup the Upper Coeur d'Alene Basin
Kirk Anderson to: CDABasin 11/12/2010 11:14 AM
Please respond to kirk

I350-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I350-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I350-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Kirk Anderson
191 Syringa Lane
PO Box 5687
Ketchum, ID 83340-5687

616234

Response to comment I350-1

See response to Comment No. I295-1.

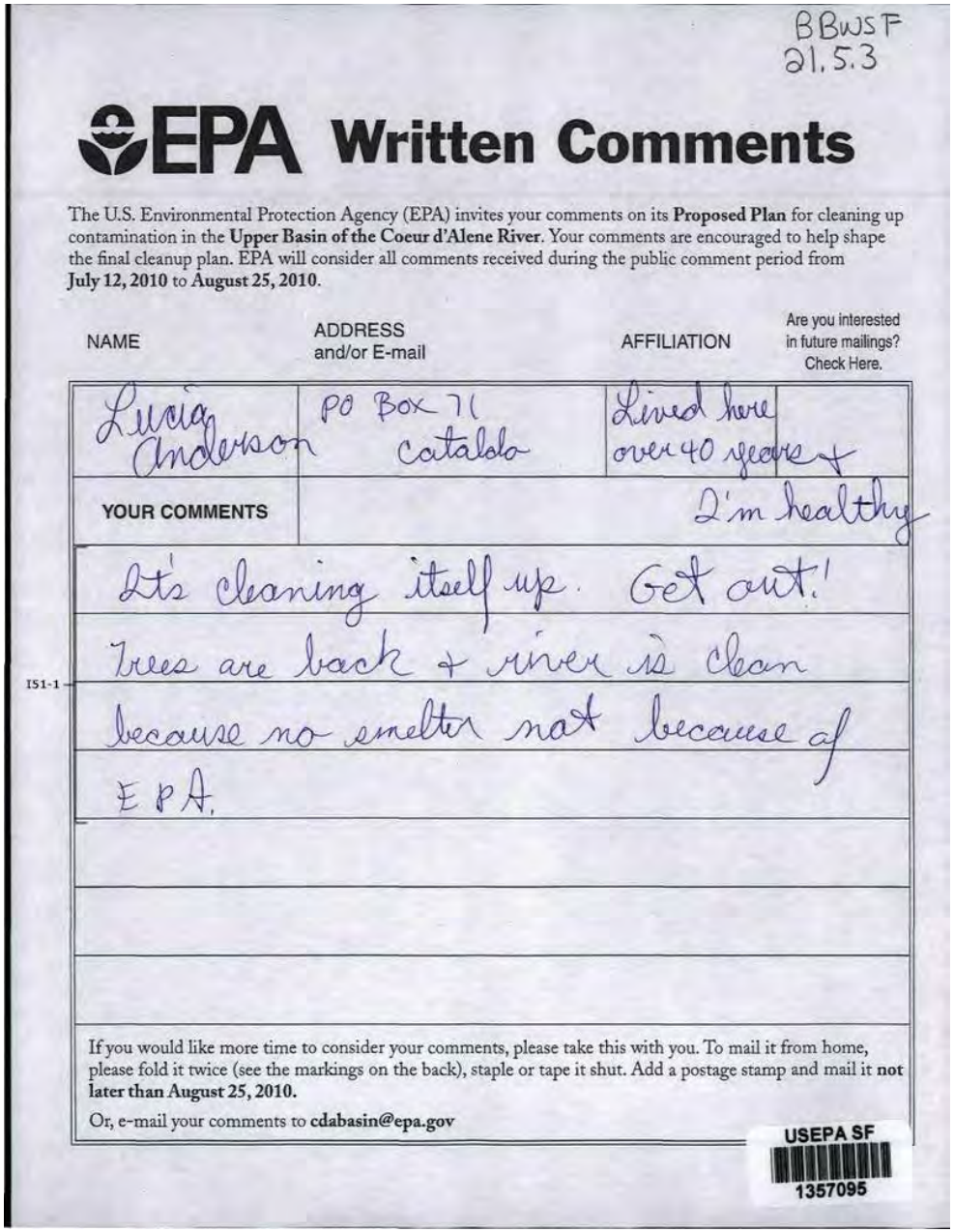
Response to comment I350-2

See response to Comment No. I295-2.

Response to comment I350-3

See response to Comment No. I295-3.

Anderson ,Lucia, I51, Letter 1357095



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Lucia Anderson	PO Box 71 Cataldo	Lived here over 40 years +	

YOUR COMMENTS

I'm healthy

It's cleaning itself up. Get out!

Trees are back + river is clean

I51-1 because no smelter not because of

EPA.

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

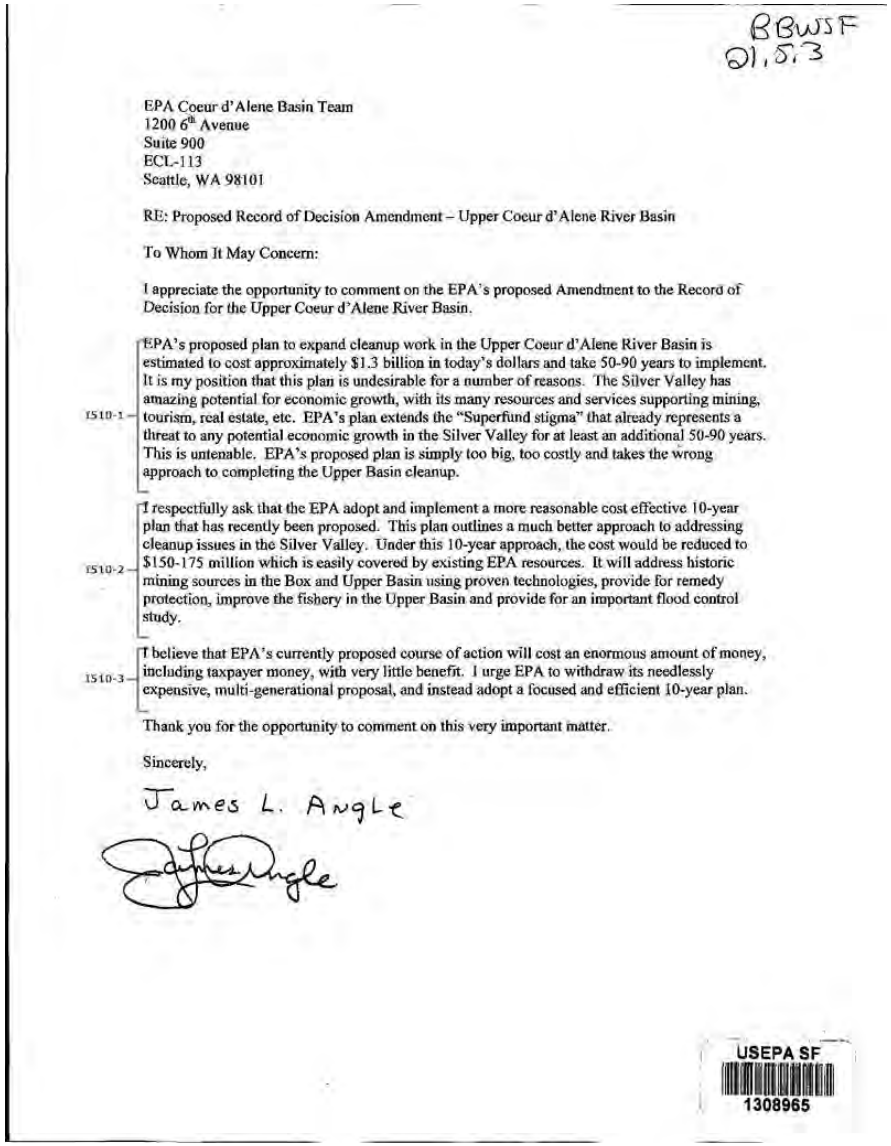
Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357095

Response to comment I51-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Although significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses risks to people, wildlife, fish, and the environment. The No Action Alternative was evaluated as part of the recent Final Focused Feasibility Study (FFS) process (EPA, August 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). However, evaluation results indicate the No Action Alternative would not be protective of human health and the environment.

Angle, James , I510, Letter 1308965



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I510-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I510-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I510-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

James L. Angle

James Angle

USEPA SF
1308965

Response to comment I510-1

See response to Comment No. I474-1.

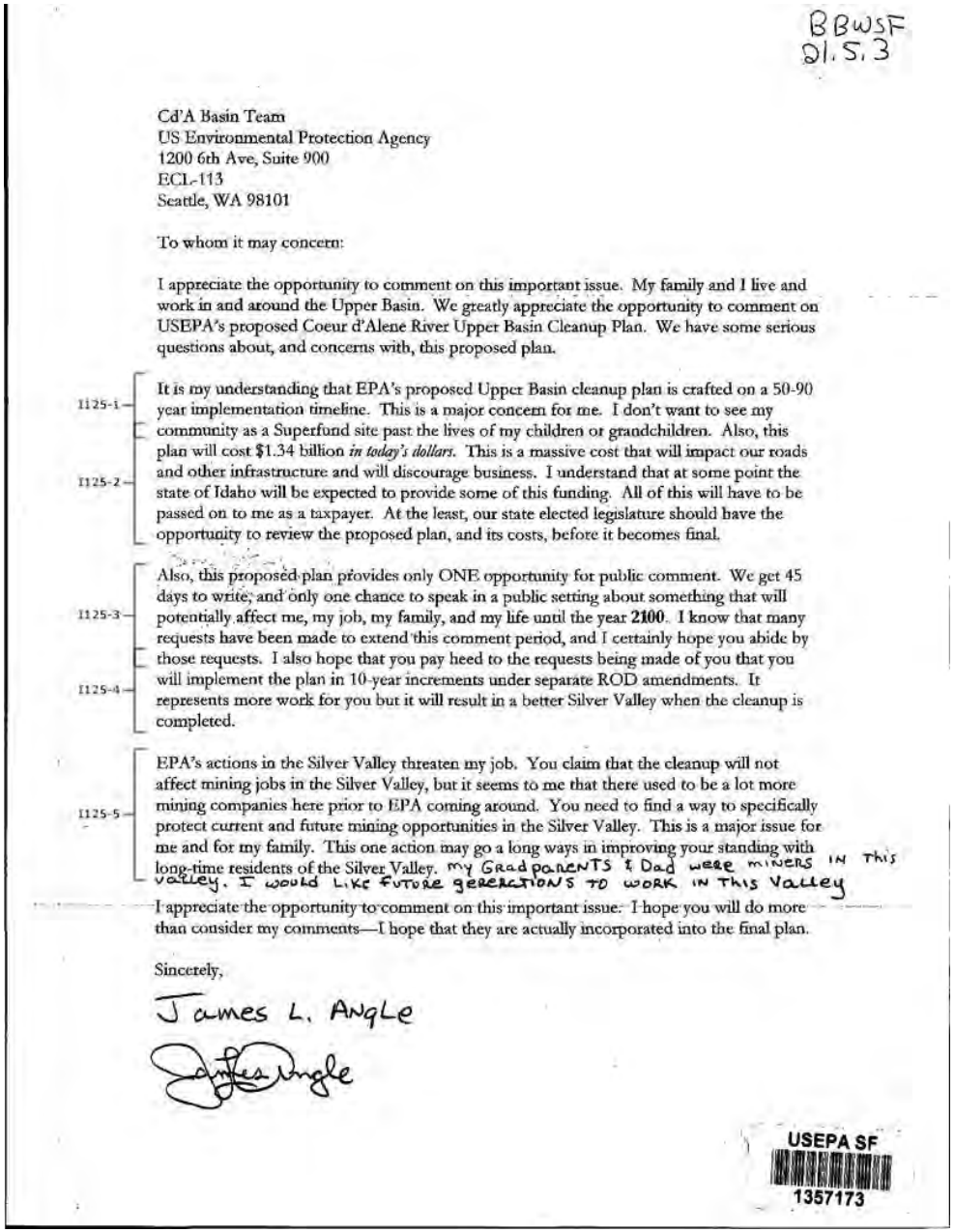
Response to comment I510-2

See response to Comment No. I474-2.

Response to comment I510-3

See response to Comment No. I474-3.

Angle, James, I125, Letter 1357173



BBWSF
01.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I125-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I125-2

I125-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I125-4

I125-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley. My Grandparents & Dad were miners in this valley. I would like future generations to work in this Valley

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

James L. Angle

James Angle

USEPA SF
1357173

Response to comment I125-1
See response to Comment No. I58-1.

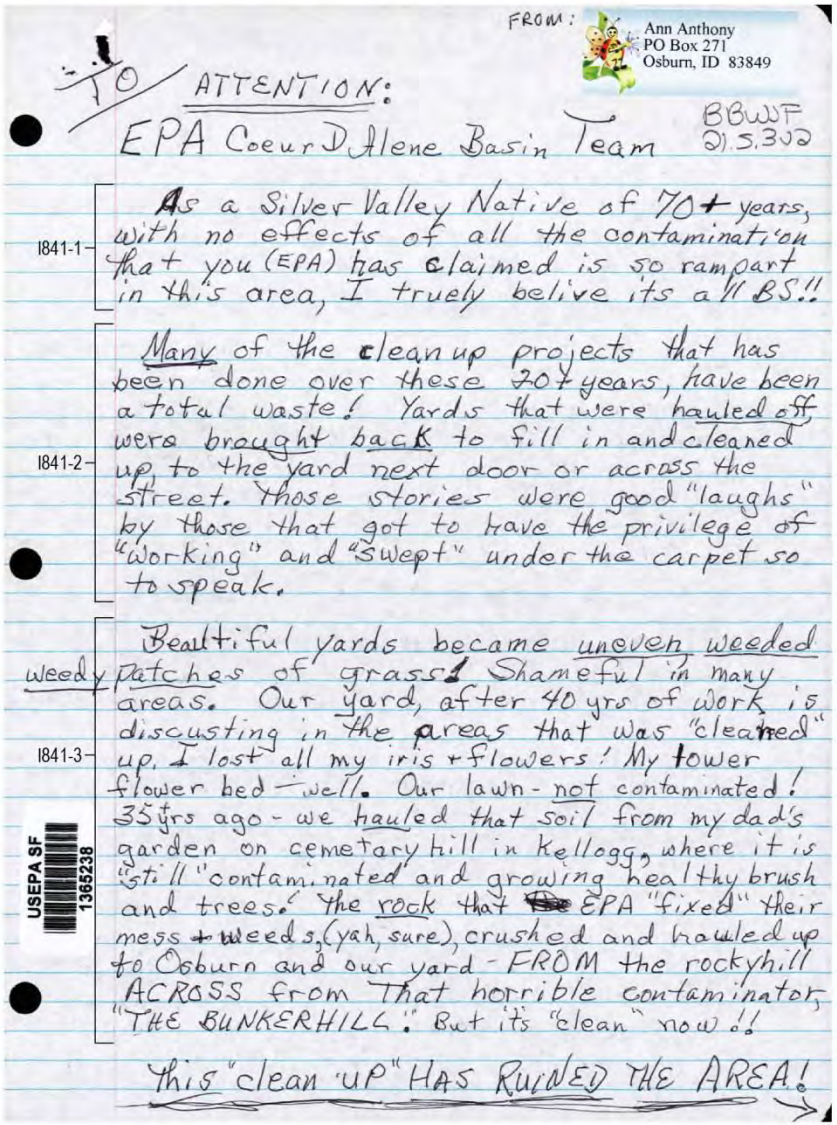
Response to comment I125-2
See response to Comment No. I58-2.

Response to comment I125-3
See response to Comment No. I58-3.

Response to comment I125-4
See response to Comment No. I58-4.

Response to comment I125-5
See response to Comment No. I58-5.

Anthony, Ann, I841, Letter 1365238



FROM: Ann Anthony
PO Box 271
Osburn, ID 83849

TO ATTENTION:
EPA Coeur D'Alene Basin Team

BBWF
2.1.5.3.02

I841-1 As a Silver Valley Native of 70+ years, with no effects of all the contamination that you (EPA) has claimed is so rampart in this area, I truely belive its all BS!!

I841-2 Many of the clean up projects that has been done over these 20+ years, have been a total waste! Yards that were hauled off were brought back to fill in and cleaned up, to the yard next door or across the street. Those stories were good "laughs" by those that got to have the privilege of "working" and "swept" under the carpet so to speak.

I841-3 Beautiful yards became uneven, weeded weedy patches of grass! Shameful in many areas. Our yard, after 40 yrs of work, is disgusting in the areas that was "cleaned" up. I lost all my iris + flowers! My tower flower bed – well. Our lawn - not contaminated! 35 yrs ago - we hauled that soil from my dad's garden on cemetary hill in Kellogg, where it is still "contaminated and growing healthy brush and trees." The rock that ~~the~~ EPA "fixed" their mess + weeds, (yah, sure), crushed and hauled up to Osburn and our yard - FROM the rockyhill ACROSS from That horrible contaminator, "THE BUNKERHILL." But it's "clean" now!!

This "clean up" HAS RUINED THE AREA!

USEPA SF 1365238

Response to comment I841-1

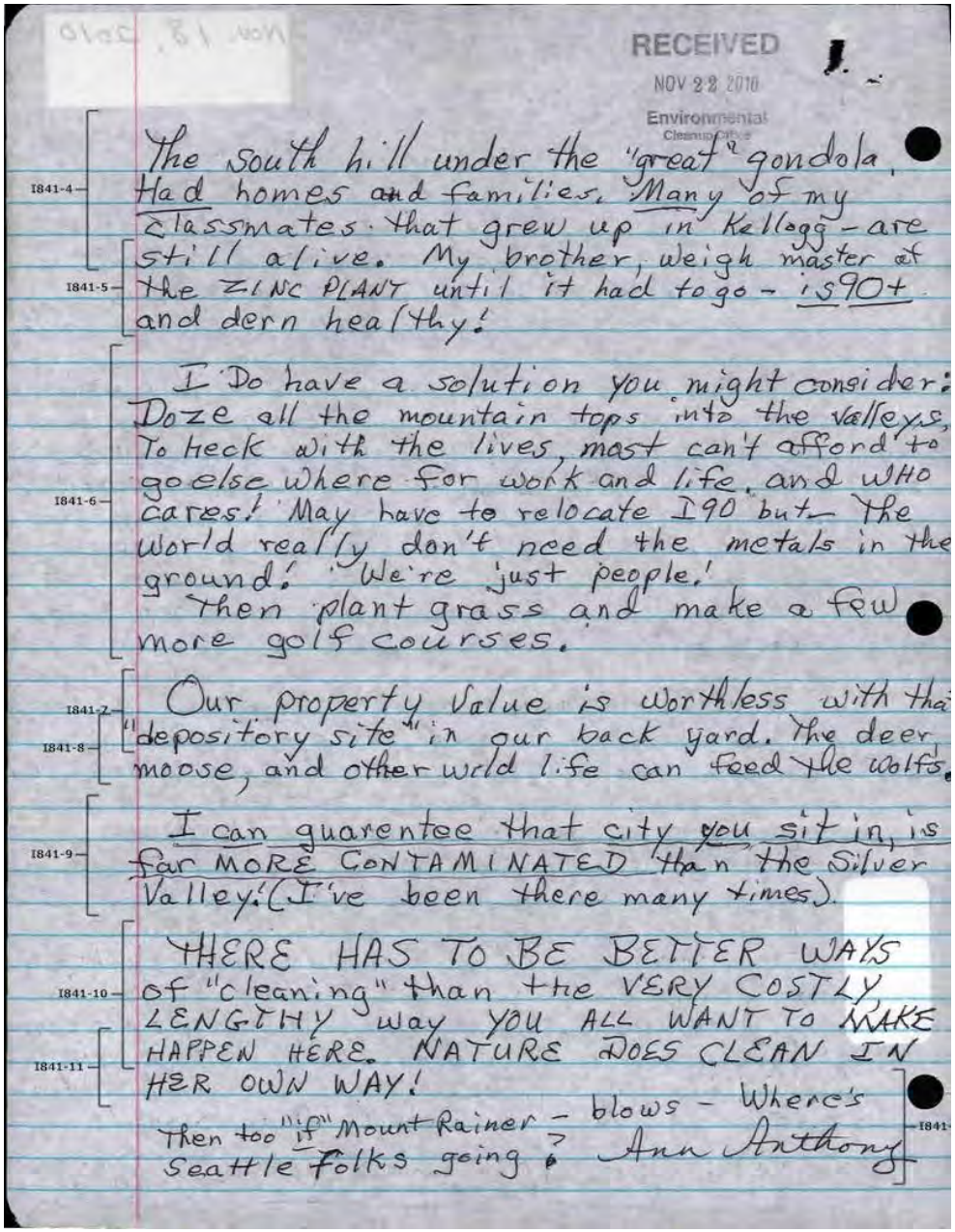
While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. Contaminants include lead, zinc, cadmium, arsenic, and other metals. Millions of tons of old mill tailings, mine waste rock, and ore concentrates are spread across areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to addressing these unacceptable risks.

Response to comment I841-2

See response to Comment No. I521-8 regarding the yard cleanup program. If the commenter is aware of specific instances of contaminated material used for "clean" barriers, please contact IDEQ or EPA.

Response to comment I841-3

See response to Comment No. I521-8.



RECEIVED
NOV 22 2010
Environmental Cleanup Office

I841-4 The south hill under the "great" gondola, Had homes and families. Many of my classmates that grew up in Kellogg - are still alive. My brother, weigh master at
I841-5 the ZINC PLANT until it had to go - is 90+ and dern healthy!

I841-6 I Do have a solution you might consider: Doze all the mountain tops into the valleys, To Heck with the lives, most can't afford to go else where for work and life, and WHO cares! May have to relocate I90 but - The world really don't need the metals in the ground! We're just people!
Then plant grass and make a few more golf courses.

I841-7 Our property value is worthless with that
I841-8 "depository site" in our back yard. The deer, moose, and other wild life can feed the wolfs.

I841-9 I can guarentee that city you sit in, is far MORE CONTAMINATED than the Silver Valley. (I've been there many times).

I841-10 THERE HAS TO BE BETTER WAYS of "cleaning" than the VERY COSTLY LENGTHY way YOU ALL WANT TO MAKE
I841-11 HAPPEN HERE. NATURE DOES CLEAN IN HER OWN WAY!

Then too "if" Mount Rainer - blows - Where's Seattle folks going?

Ann Anthony

I841-12

Response to comment I841-4
Comment noted.

Response to comment I841-5
We commend your brother on his continued good health. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination that poses unacceptable risks to human health and the environment. The Upper Basin cleanup is essential to addressing these unacceptable risks.

Response to comment I841-6
Comment noted.

Response to comment I841-7
See response to Comment No. I54-3.

Response to comment I841-8
Comment noted.

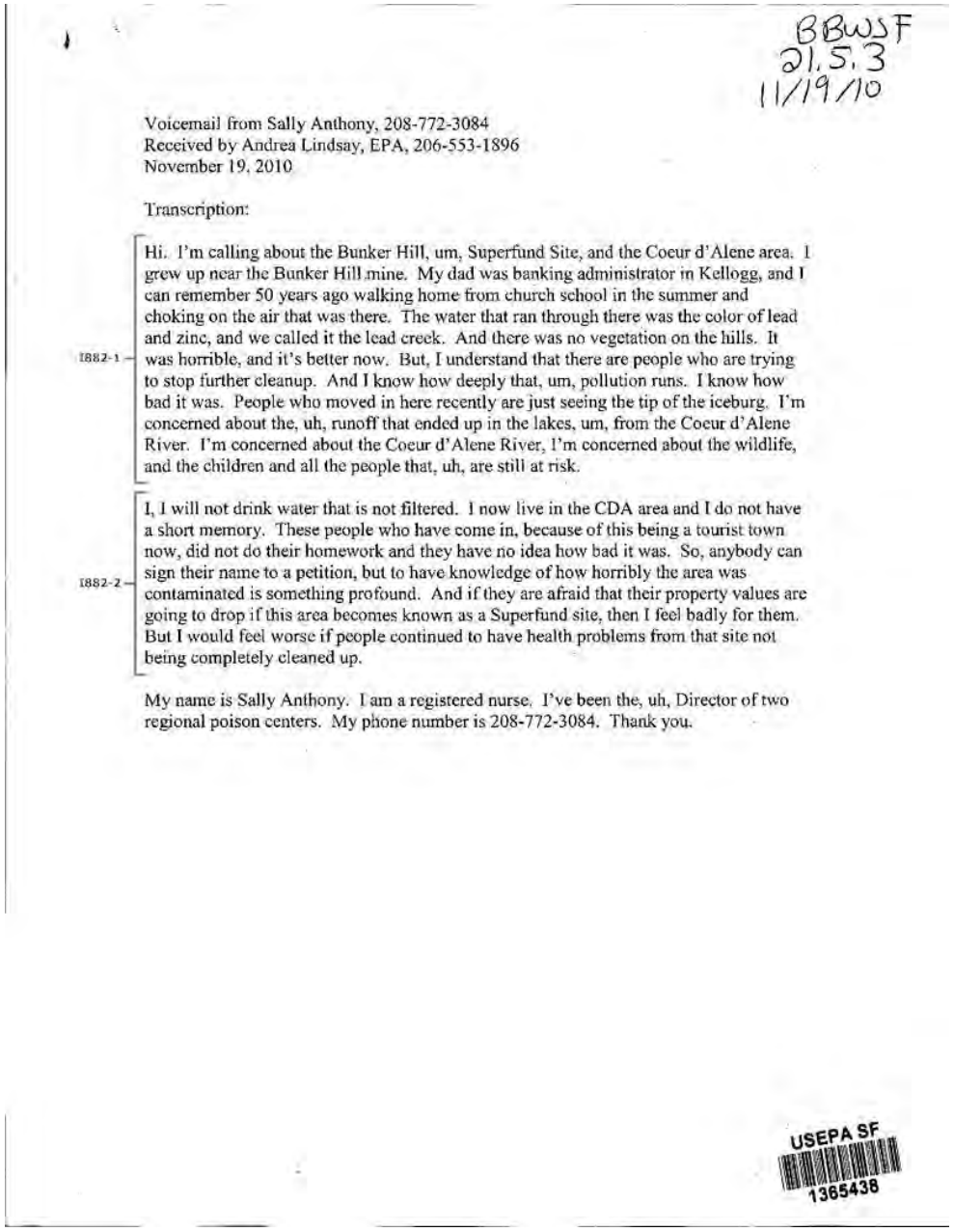
Response to comment I841-9
Comment noted.

Response to comment I841-10
EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. See responses to Comment Nos. I58-1 and I58-2.

Response to comment I841-11
Comment noted.

Response to comment I841-12
Comment noted.

Anthony, Sally, I882, Letter 1365438



BBWSF
21.5.3
11/19/10

Voicemail from Sally Anthony, 208-772-3084
Received by Andrea Lindsay, EPA, 206-553-1896
November 19, 2010

Transcription:

I882-1 — Hi. I'm calling about the Bunker Hill, um, Superfund Site, and the Coeur d'Alene area. I grew up near the Bunker Hill mine. My dad was banking administrator in Kellogg, and I can remember 50 years ago walking home from church school in the summer and choking on the air that was there. The water that ran through there was the color of lead and zinc, and we called it the lead creek. And there was no vegetation on the hills. It was horrible, and it's better now. But, I understand that there are people who are trying to stop further cleanup. And I know how deeply that, um, pollution runs. I know how bad it was. People who moved in here recently are just seeing the tip of the iceburg. I'm concerned about the, uh, runoff that ended up in the lakes, um, from the Coeur d'Alene River. I'm concerned about the Coeur d'Alene River, I'm concerned about the wildlife, and the children and all the people that, uh, are still at risk.

I882-2 — I, I will not drink water that is not filtered. I now live in the CDA area and I do not have a short memory. These people who have come in, because of this being a tourist town now, did not do their homework and they have no idea how bad it was. So, anybody can sign their name to a petition, but to have knowledge of how horribly the area was contaminated is something profound. And if they are afraid that their property values are going to drop if this area becomes known as a Superfund site, then I feel badly for them. But I would feel worse if people continued to have health problems from that site not being completely cleaned up.

My name is Sally Anthony. I am a registered nurse. I've been the, uh, Director of two regional poison centers. My phone number is 208-772-3084. Thank you.

USEPA SF
1365438

Response to comment I882-1

EPA appreciates your concern regarding the contamination that has occurred over time in the Basin. While significant cleanup has taken place, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. The Upper Basin cleanup is essential to reducing these risks.

Response to comment I882-2

Thank you for your comment. See response to Comment No. I295-1.

transcribed voicemail comment
Andrea Lindsay to: cdabasin, Dailey.Anne 11/22/2010 08:17 AM

PPcommentvoicemailtranscript.doc

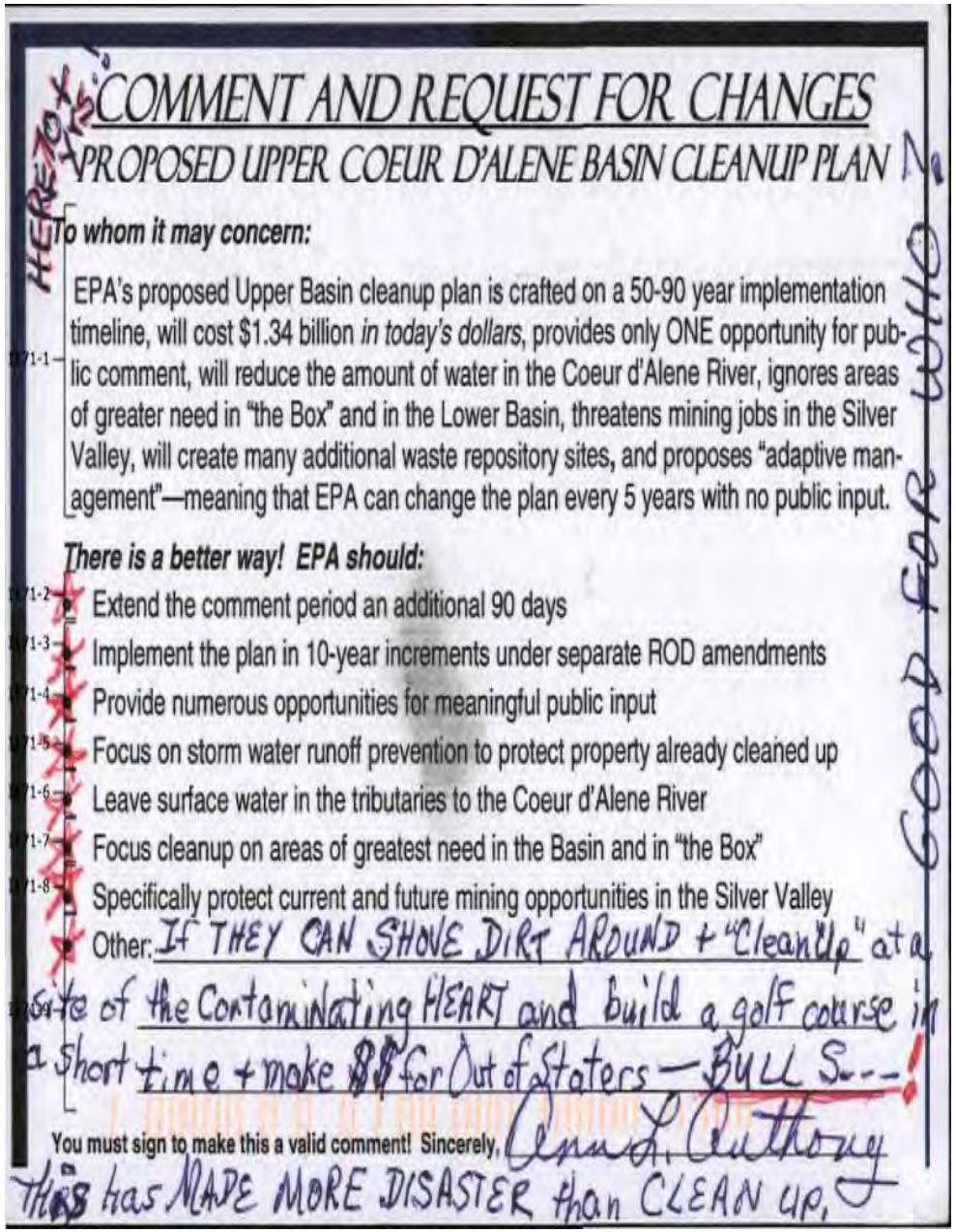
****

Andrea Lindsay
Community Involvement Coordinator
EPA, 1200 6th Avenue, Suite 900
Seattle, WA 98101
206/553-1896
Work days: Mon, Thurs, Fri

Sign up for EPA R10's Water News Listserv at
www.epa.gov/r10earth/watertalk.htm

No comments

Anthony, Ann, I171, Letter 1357372



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

HERE TO ... COMMENT AND REQUEST FOR CHANGES ... GOOD FOR WHO

To whom it may concern:

I171-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I171-2 Extend the comment period an additional 90 days
I171-3 Implement the plan in 10-year increments under separate ROD amendments
I171-4 Provide numerous opportunities for meaningful public input
I171-5 Focus on storm water runoff prevention to protect property already cleaned up
I171-6 Leave surface water in the tributaries to the Coeur d'Alene River
I171-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
I171-8 Specifically protect current and future mining opportunities in the Silver Valley
Other: IF THEY CAN SHOVE DIRT AROUND + "Clean Up" at a site of the Contaminating HEART and build a golf course in a short time + make $$ for Out of Staters — BULL S--- !

You must sign to make this a valid comment! Sincerely, Ann L. Anthony

THIS has MADE MORE DISASTER than CLEAN UP.

Response to comment I171-1
See response to Comment No. I25-1.

Response to comment I171-2
See response to Comment No. I25-2.

Response to comment I171-3
See response to Comment No. I25-3.

Response to comment I171-4
See response to Comment No. I25-4.

Response to comment I171-5
See response to Comment No. I25-5.

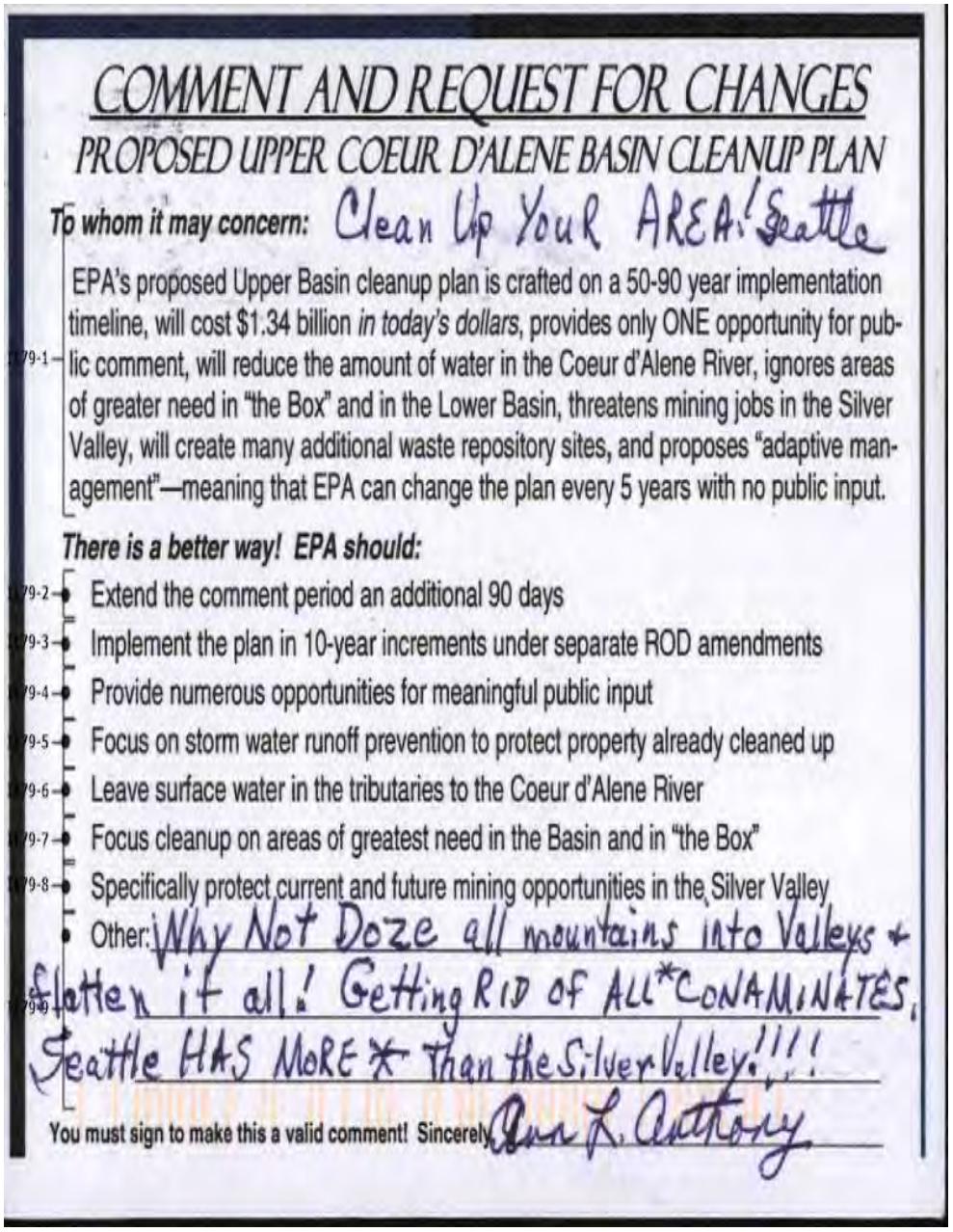
Response to comment I171-6
See response to Comment No. I25-6.

Response to comment I171-7
See response to Comment No. I25-7.

Response to comment I171-8
See response to Comment No. I25-8.

Response to comment I171-9
Comment noted.

Anthony, Ann, I179, Letter 1357372



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern: Clean Up Your AREA! Seattle

I179-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I179-2 Extend the comment period an additional 90 days
- I179-3 Implement the plan in 10-year increments under separate ROD amendments
- I179-4 Provide numerous opportunities for meaningful public input
- I179-5 Focus on storm water runoff prevention to protect property already cleaned up
- I179-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I179-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I179-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: Why Not Doze all mountains into Valleys & flatten it all! Getting RID of ALL*CONAMINATES, I179-9 Seattle HAS MORE * than the Silver Valley!!!!

You must sign to make this a valid comment! Sincerely, Ann L. Anthony

Response to comment I179-1
See response to Comment No. I25-1.

Response to comment I179-2
See response to Comment No. I25-2.

Response to comment I179-3
See response to Comment No. I25-3.

Response to comment I179-4
See response to Comment No. I25-4.

Response to comment I179-5
See response to Comment No. I25-5.

Response to comment I179-6
See response to Comment No. I25-6.

Response to comment I179-7
See response to Comment No. I25-7.

Response to comment I179-8
See response to Comment No. I25-8.

Response to comment I179-9
Comment noted.

Anthony, Sally, I681, Letter 618291

Voicemail from Sally Anthony, 208-772-3084
Received by Andrea Lindsay, EPA, 206-553-1896
November 19, 2010

Transcription:

I681-1 Hi. I'm calling about the Bunker Hill, um, Superfund Site, and the Coeur d'Alene area. I grew up near the Bunker Hill mine. My dad was banking administrator in Kellogg, and I can remember 50 years ago walking home from church school in the summer and choking on the air that was there. The water that ran through there was the color of lead and zinc, and we called it the lead creek. And there was no vegetation on the hills. It was horrible, and it's better now. But, I understand that there are people who are trying to stop further cleanup. And I know how deeply that, um, pollution runs. I know how bad it was. People who moved in here recently are just seeing the tip of the iceburg. I'm concerned about the, uh, runoff that ended up in the lakes, um, from the Coeur d'Alene River. I'm concerned about the Coeur d'Alene River, I'm concerned about the wildlife, and the children and all the people that, uh, are still at risk.

I681-2 I, I will not drink water that is not filtered. I now live in the CDA area and I do not have a short memory. These people who have come in, because of this being a tourist town now, did not do their homework and they have no idea how bad it was. So, anybody can sign their name to a petition, but to have knowledge of how horribly the area was contaminated is something profound. And if they are afraid that their property values are going to drop if this area becomes known as a Superfund site, then I feel badly for them. But I would feel worse if people continued to have health problems from that site not being completely cleaned up.

My name is Sally Anthony. I am a registered nurse. I've been the, uh, Director of two regional poison centers. My phone number is 208-772-3084. Thank you.

618291

Response to comment I681-1

Thank you for your comment.

Response to comment I681-2

Thank you for your comment.

Antonioli, Ted, I529, Letter 617270

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
ted.antonioli@gmail.com to: formsubmission 11/17/2010 05:49 PM
Sent by: Ted.Antonioli@Gmail.Com <ted.antonioli=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Ted Antonioli
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I529-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: Missoula Chapter
Montana Mining Association
P.O. Box
Missoula, MT 59806

To: EPA Coeur d' Alene Basin Team
1200-6th Ave. Suite 900
ECL-113
Seattle, WA 98101

I529-2 Re: Proposed ROD - Upper Coeur d' Alene Basin

To Whom it may concern:

The Missoula Chapter of the Montana Mining Association is composed of prospectors, geologists, mine operators and hobbiests. Several of our members

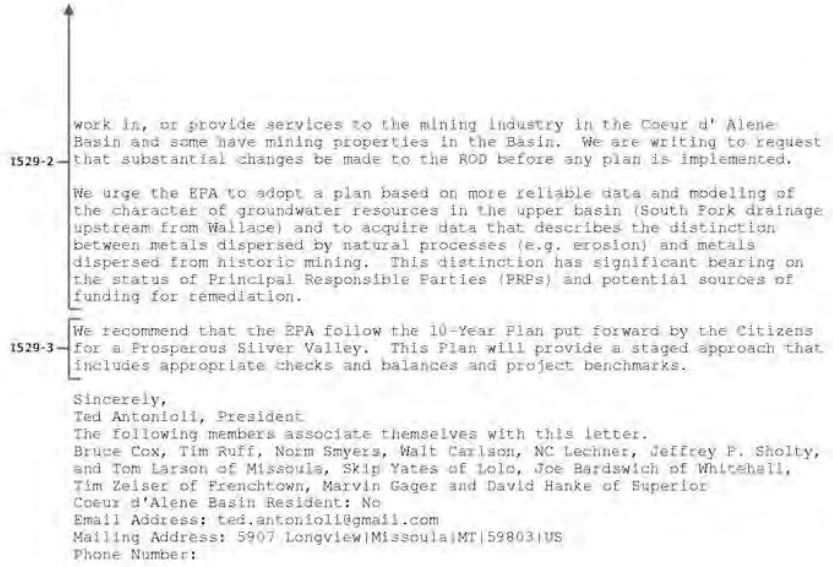
617270

Response to comment I529-1

See response to Comment No. I351-1.

Response to comment I529-2

See responses to Comment Nos. I58-1 and LC33-8.



work in, or provide services to the mining industry in the Coeur d' Alene Basin and some have mining properties in the Basin. We are writing to request
I529-2 that substantial changes be made to the ROD before any plan is implemented.

We urge the EPA to adopt a plan based on more reliable data and modeling of the character of groundwater resources in the upper basin (South Fork drainage upstream from Wallace) and to acquire data that describes the distinction between metals dispersed by natural processes (e.g. erosion) and metals dispersed from historic mining. This distinction has significant bearing on the status of Principal Responsible Parties (PRPs) and potential sources of funding for remediation.

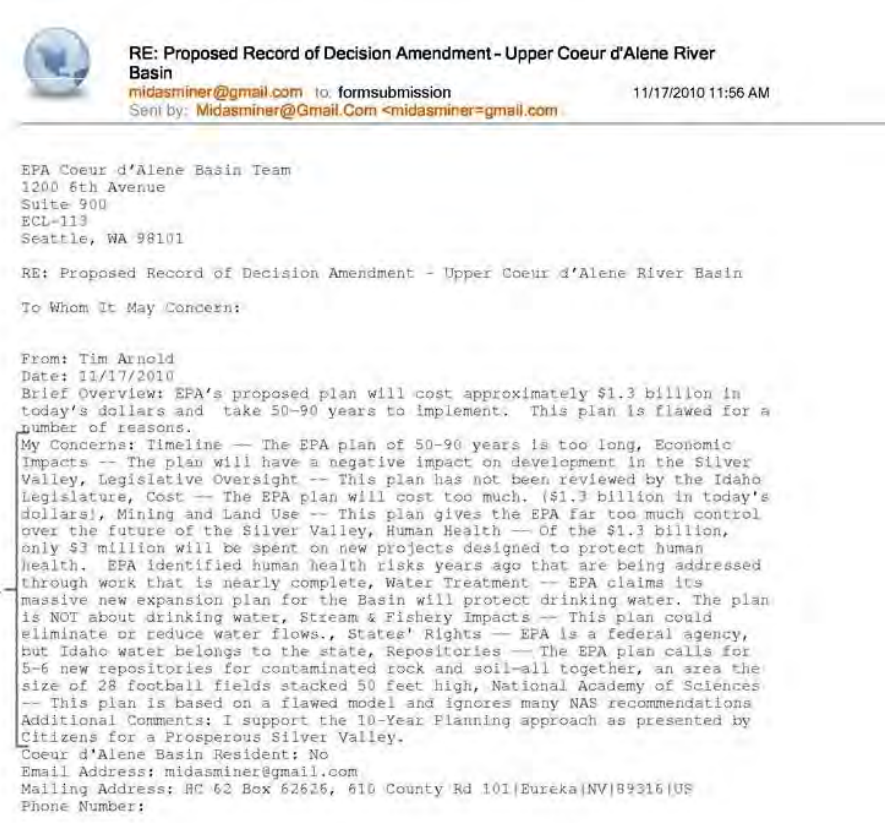
We recommend that the EPA follow the 10-Year Plan put forward by the Citizens
I529-3 for a Prosperous Silver Valley. This Plan will provide a staged approach that includes appropriate checks and balances and project benchmarks.

Sincerely,
Ted Antonioli, President
The following members associate themselves with this letter.
Bruce Cox, Tim Ruff, Norm Smyers, Walt Carlson, NC Lechner, Jeffrey P. Sholty, and Tom Larson of Missoula, Skip Yates of Lolo, Joe Bardswich of Whitehall, Tim Zeiser of Frenchtown, Marvin Gager and David Hanke of Superior
Coeur d'Alene Basin Resident: No
Email Address: ted.antonioli@gmail.com
Mailing Address: 5907 Longview|Missoula|MT|59803|US
Phone Number:

Response to comment I529-3

See response to Comment No. I474-2.

Arnold, Tim, I909, Letter 617271



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
midasminer@gmail.com to: formsubmission 11/17/2010 11:56 AM
Sent by: Midasminer@Gmail.Com <midasminer=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Tim Arnold
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: midasminer@gmail.com
Mailing Address: HC 62 Box 62626, 610 County Rd 101|Eureka|NV|89316|US
Phone Number:

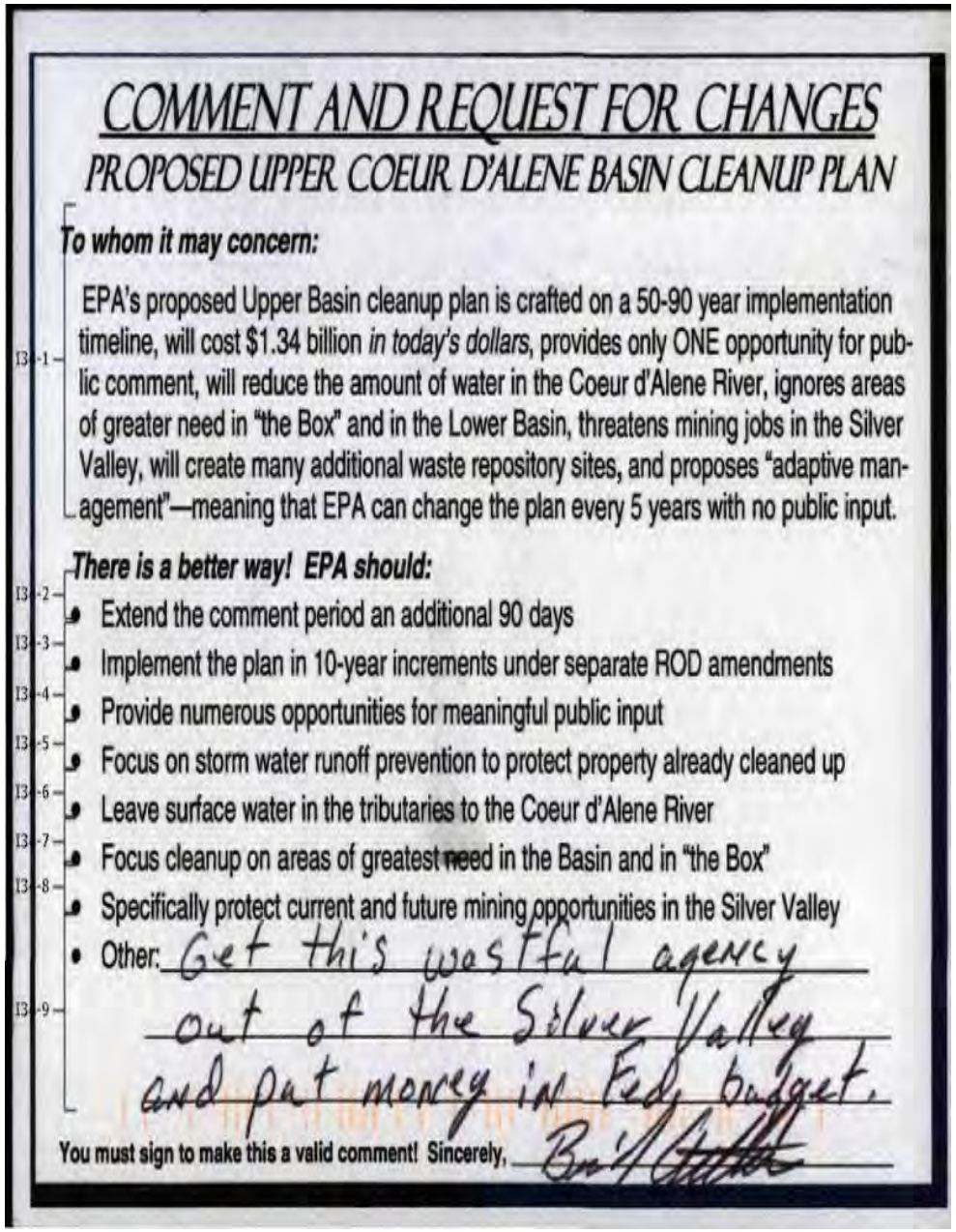
I909-1

617271

Response to comment I909-1

See response to Comment No. I351-1.

Arthur, Billie, I34, Letter 1357078



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I34-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I34-2 Extend the comment period an additional 90 days
- I34-3 Implement the plan in 10-year increments under separate ROD amendments
- I34-4 Provide numerous opportunities for meaningful public input
- I34-5 Focus on storm water runoff prevention to protect property already cleaned up
- I34-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I34-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I34-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: Get this wasteful agency out of the Silver Valley and put money in Fed budget.

I34-9 **You must sign to make this a valid comment! Sincerely,** Bill Arthur

Response to comment I34-1
See response to Comment No. I25-1.

Response to comment I34-2
See response to Comment No. I25-2.

Response to comment I34-3
See response to Comment No. I25-3.

Response to comment I34-4
See response to Comment No. I25-4.

Response to comment I34-5
See response to Comment No. I25-5.

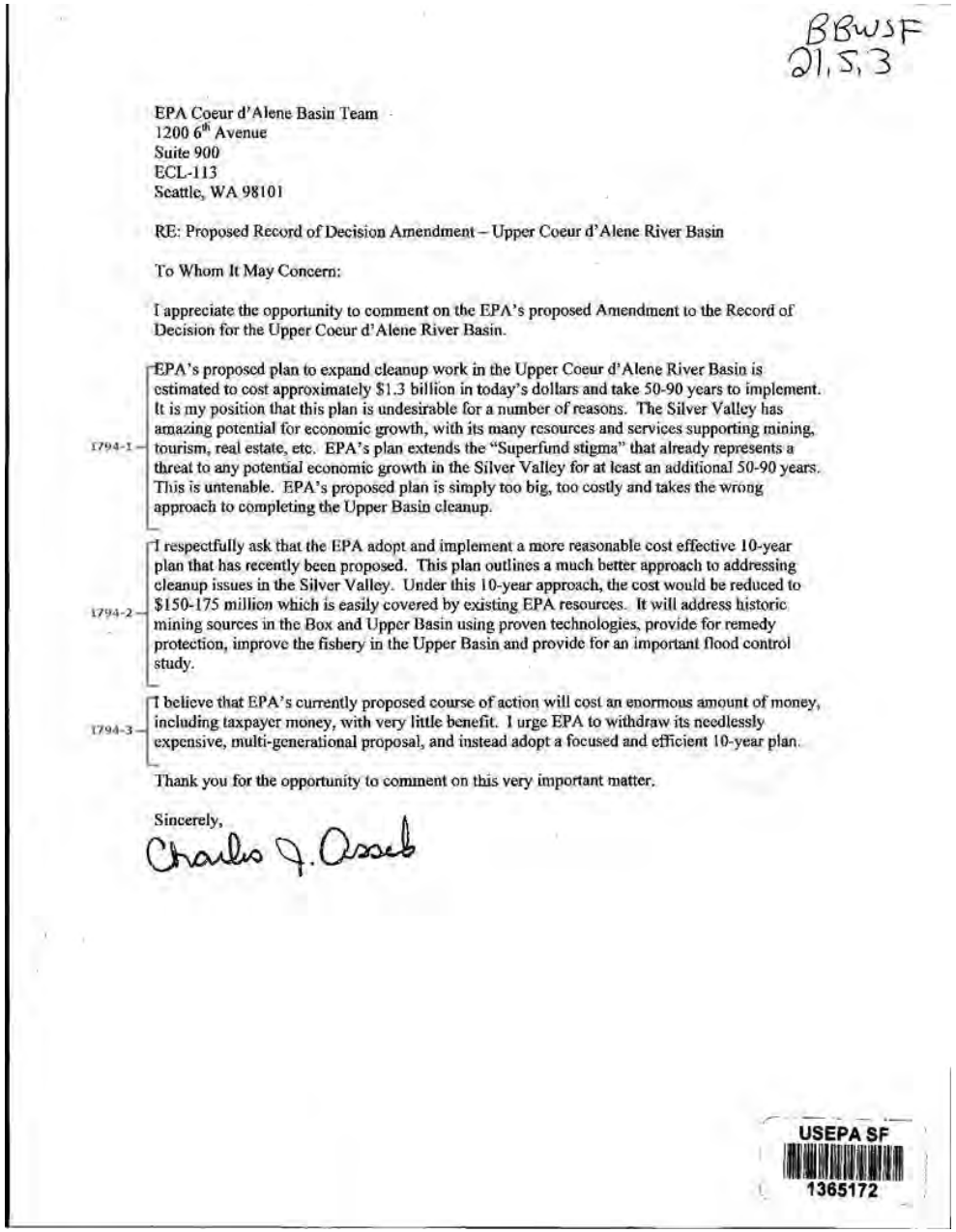
Response to comment I34-6
See response to Comment No. I25-6.

Response to comment I34-7
See response to Comment No. I25-7.

Response to comment I34-8
See response to Comment No. I25-8.

Response to comment I34-9
See response to Comment No. I58-2.

Asseb, Charles J, I794, Letter 1365172



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I794-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I794-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I794-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,
Charles J. Asseb

USEPA SF
1365172

Response to comment I794-1
See response to Comment No. I474-1.

Response to comment I794-2
See response to Comment No. I474-2.

Response to comment I794-3
See response to Comment No. I474-3.

Bailey, Mark, I351, Letter 616235

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mflmark@aol.com to: formsubmission 11/11/2010 10:25 AM
Sent by: MflMark@Aol.Com <mflmark=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Mark Bailey
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts — The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I351-1

The EPA needs to be reined in, we can not afford more of the same wasteful spending by federal government. We should be cutting the EPA not expanding it and its authority.
Coeur d'Alene Basin Resident: No
Email Address: mflmark@aol.com
Mailing Address: 2930 Hayward Dr.|Bellingham|WA|98226|US
Phone Number:

616235

Response to comment I351-1

Due in part to extensive public concern about the duration of cleanup, EPA has decided to reduce the scope of the Selected Remedy by prioritizing the remedial actions that were presented as EPA's Preferred Alternative in the Proposed Plan. The Upper Basin Selected Remedy is an interim remedy which identifies the priority remedial actions that are expected to provide the greatest reduction of contamination in the SFCDR and its tributaries and protection of in-place human health barriers in local communities. EPA's goal is to complete the actions identified in the interim remedy in the Upper Basin as quickly as possible and with minimum disruption. Most of the cleanup work will be in the areas of greatest contamination which are generally in more remote areas and hence won't be highly visible or disruptive to communities. Implementation of the Selected Remedy is expected to take about 30 years.

How long it takes to implement the Selected Remedy will ultimately depend upon the annual funding rate, the ability to work in multiple areas simultaneously, the overall pace of cleanup, and how well the environmental system responds to cleanup actions. As the cleanup progresses, EPA will routinely look for opportunities to speed up cleanup activities while also identifying locations where no further or more limited action is required. Using the adaptive management process, EPA will also continually evaluate the effectiveness of the cleanup actions, as well as the need for additional actions.

Economic Impacts – The plan will have a negative impact on development in the Silver Valley.

EPA believes that the cleanup will benefit the local economy in a variety of ways. The Selected Remedy will boost economic growth by significantly improving the environment for residents and tourists, creating jobs with the money that will be spent on the Upper Basin cleanup, and providing opportunities for currently contaminated land to be redeveloped. Retail development in Smelterville, the Galena Ridge golf community, and the Trail of the Coeur d'Alenes are examples of the types of redevelopment that can occur on remediated properties.

Since 2000, millions of dollars have been spent on cleanup, primarily for yard remediation and cleanup in the Bunker Hill Box. Significant spending will continue for the cleanup actions in the Upper Basin. EPA encourages the hiring of local businesses and workforce for the cleanup work.

Cleanup of additional properties in the Silver Valley will provide opportunities for development that do not currently exist. EPA is committed to working with the mining industry and Silver Valley businesses and landowners to conduct the cleanup in ways that are consistent with the current and future land uses desired by the community. Throughout the cleanup, there will be opportunities for the public to provide input on implementation planning through the established Basin Environmental Improvement Project Commission (Basin Commission) process.

Legislative Oversight – This plan has not been reviewed by the Idaho Legislature,

Under the Superfund law, EPA has a responsibility and the authority to take actions to protect human health and the environment. EPA's decisionmaking process has been a careful and collaborative effort, which included input from state and local governments, tribes, other federal agencies, the Basin Commission, and the public. During the Focused Feasibility Study for the Upper Basin, EPA met regularly with the Basin Commission's Upper Basin Project Focus Team (PFT), a group focused on technical issues related to cleanup and primarily composed of interested citizens and representatives from the State of Idaho, Shoshone County, the U.S. Bureau of Land Management, the U.S. Fish and Wildlife Service, the U.S. Forest Service, the Coeur d'Alene and Spokane Tribes, and the State of Washington. Additional stakeholders participated in some of these meetings, including mining industry representatives. During the 135-day Proposed Plan comment period, some members of the Idaho State Legislature reviewed and submitted formal comments on the Proposed Plan.

Cost – The EPA plan will cost too much ($1.3 billion in today's dollars),

EPA agrees that this is a considerable amount of money and has significantly reduced the scope of the Selected Remedy so that the total cost is decreased by about half. EPA's implementation planning process will also ensure that money is spent wisely to protect human health and the environment.

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. The Preferred Alternative as presented in the Proposed Plan provided an overall vision of the estimated full amount of cleanup required in the Upper Basin. Based on comments received from the public EPA decided to reduce the scope of this ROD Amendment. The Selected Remedy is now an interim remedy which identifies the priority remedial actions that are expected to provide the greatest reduction of contamination in the SFCDR and its tributaries and protection of in-place human health barriers in local communities. The Selected Remedy will make substantial progress toward the overall cleanup goals perhaps may eventually achieve those goals without additional actions. EPA will ensure that settlement monies are spent wisely and will maximize the cleanup completed using these funds. This will be accomplished by rigorous implementation planning and pacing cleanup over time, allowing interest to accrue on the settlement monies.

EPA has listened and responded to comments received on the Proposed Plan to reduce the scope of the Selected Remedy. The total estimated cost of the Selected Remedy as presented in the ROD Amendment is $635 million. This includes capital costs as well as long-term operation and maintenance costs. Furthermore, EPA has developed and documented an implementation approach to identify where the work starts, how it will proceed, how sites may be removed from the Selected Remedy should additional data indicate acceptable exposure risks, and how the community can be involved. The bottom line is that actions will be planned and implemented to ensure that those providing the highest value in terms of effectiveness per dollar spent are conducted first, with consideration of a variety of other factors in consultation with the Basin Commission's Upper Basin PFT and other community members. EPA understands that $635 million is still a large sum of money, but cleaning up contamination from a hundred years of past mining practices in this large and complex area will require considerable time and resources. The actions included in the Selected Remedy will provide a significant step forward in site cleanup and EPA is committed to getting the job done as efficiently as possible.

Mining and Land Use – This plan gives the EPA far too much control over the future of the Silver Valley.

EPA is confident that cleanup and mining can coexist. The Upper Basin cleanup will address historical contamination from mining activities that began in the 1880s. Historical mine waste disposal practices were much different than they

are today. For example, until 1968, significant amounts of mine wastes were discharged directly into creeks and rivers. This widespread contamination from past mining and smelting activities led to the necessity of CERCLA cleanup actions. Today, ongoing mining activities are regulated by state and federal laws other than the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

In response to public comments and concerns, the Upper Basin ROD Amendment clarifies the decision process for whether CERCLA cleanup actions will be conducted at "Active Facilities" (i.e., mining facilities among others). This process was developed through cooperation between EPA, IDEQ, and the community members and stakeholders involved in the Basin Commission's Upper Basin PFT. For the purposes of the ROD Amendment, an Active Facility is defined as a property where the owner is actively managing the risk of a release, or potential release, of a hazardous substance through regulatory mechanisms outside CERCLA that enforce compliance to protect human health and the environment. Active Facilities will continue to operate under those governing regulations and will be required to address the release of hazardous substances, as necessary, under those governing regulations. CERCLA cleanup actions will be conducted if data indicate that a release of hazardous substances has occurred or is occurring from a facility that poses risks to human health or the environment, and that this release is not being satisfactorily managed or addressed by the facility under an existing regulatory program.

EPA is confident that cleanup and mining can continue together in the Upper Basin. Where cleanup of historical contamination from past mining activities is planned in areas that are being currently mined, developed, or expanded, EPA will coordinate investigation, design, and cleanup work with the property owners. This approach will minimize disruption to Active Facilities.

One of the provisions of the Consent Decree between Hecla and EPA is for both parties to attend an annual planning meeting to coordinate the cleanup with ongoing exploration or development by Hecla. EPA is willing to coordinate with other mining companies in the Basin in a similar way, and welcomes further discussions with them.

Cleanup is not expected to restrict future mining and exploration in the Silver Valley. EPA is aware that mining has been an important part of the history and economy of the Silver Valley and will continue to be in the future. EPA also understands that mining companies need certainty for planning and investing, and is committed to completing cleanup actions in ways that allow mining operations to continue in compliance with environmental regulations.

Cleanup of additional properties in the Silver Valley will provide opportunities for development that do not currently exist. EPA is committed to working with the mining industry and Silver Valley businesses and landowners to conduct the cleanup in ways that are consistent with the current and future land uses desired by the community. Throughout the cleanup, there will be opportunities for the public to provide input on implementation planning through the established Basin Commission process.

Human Health – Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete.

EPA has consistently stated and shown that protection of human health in the Coeur d'Alene Basin is its highest priority. Since the ROD for OU 3 was issued in 2002, EPA has carried out the majority of the Selected Human Health Remedy throughout the residential areas of the Upper Basin. In addition, to date, millions of dollars have been spent implementing the Selected Human Health Remedies described in the existing RODs for OUs 1, 2, and 3. The Selected Human Health Remedy for OU 1, described in the 1991 ROD and performed by the Upstream Mining Group under the 1994 Consent Decree, has been certified complete. Additional human health actions in the Upper Basin are ongoing. Although human health is the highest priority, EPA is also required to address the significant risks to the environment that still exist.

It is not correct that "only $3 million will be spent on new projects designed to protect human health." The Upper Basin Selected Remedy includes an estimated $33.9 million for remedy protection work in the Upper Basin. Remedy protection is intended to protect the existing human health clean soil barriers (e.g., remediated yards, commercial properties, and rights-of-way) within Upper Basin communities from tributary flooding and high-precipitation events. In addition to the remedy protection work, cleanup actions that address mine waste contamination within drainage areas accessible for recreational use will protect human health and improve surface water quality. Common recreational activities in the Coeur d'Alene Basin include hiking, fishing, hunting, boating, swimming,

and all-terrain-vehicle riding. Exposure to lead contamination can cause elevated blood lead levels and resulting adverse neurological effects. EPA has also found that elevated blood lead levels can occur within relatively short exposure periods (such as through recreational exposure to contamination located along the SFCDR, on waste piles, etc.). The Selected Remedy will provide clean surface soil in contaminated areas and reduce particulate lead loading to surface water. In these ways, the Selected Remedy will further reduce the risks people may be exposed to during recreational activities.

Water Treatment – EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water.

EPA has not focused this Selected Remedy on drinking water. The focus of the remedial actions is to achieve the applicable or relevant and appropriate requirements (ARARs) for surface water. In the case of the SFCDR, the ARARs that will protect the environment are the site-specific ambient water quality criteria (AWQC), which were developed by the State of Idaho to protect aquatic life. The water quality standards to protect the environment are more stringent than drinking water standards (i.e., maximum contaminant levels) for contaminants of concern in the Basin. There is one exception, mercury, as it has not been found to be prevalent in the Upper Basin. EPA is simply stating that by achieving the AWQC through the proposed water treatment actions, the surface water in the SFCDR will also meet drinking water standards.

Water treatment is a key part of this remedy because it (1) addresses subsurface materials too deep or impractical to be removed, (2) generally provides a high degree of metals load reduction for a relatively low cost, and (3) provides immediate improvements to surface water quality.

Stream & Fishery Impacts – This plan could eliminate or reduce water flows.

Collection of contaminated groundwater for treatment will reduce surface water flows in Canyon Creek and the SFCDR, but not significantly. EPA has modeled these reductions during low-flow and average-flow conditions. The modeling estimates that the maximum stream flow reductions in Canyon Creek and the SFCDR during extreme low-flow conditions would be about 10 percent and 16 percent, respectively. To put this in perspective, in a "typical" year, dry season flow rates, as represented by flows in the 10 percentile, have been shown to fluctuate by 21 percent on average over the period of record. Therefore, a fluctuation of 16 percent is within the range of average natural low flow fluctuation from year to year. Under average-flow conditions, the reductions are estimated to only be about 1 percent in Canyon Creek and 5 percent in the SFCDR. Further, this reduction will only occur for a small stretch of river between the collection points in Osburn and Canyon Creek and Kellogg, where the same volume of clean treated water will be returned to the SFCDR. EPA has estimated this expected stream flow reduction using Basin-wide groundwater model historical stream flow monitoring data collected by the U.S. Geological Service (see the Final FFS Report [EPA, 2012] for documentation of these analyses). Before conducting any water treatment project, EPA will perform additional study and remedial design to ensure that stream flows are not reduced to a point that will have negative effects on water rights holders or aquatic life. During and after remedy implementation, stream flows and collected flow rates will be monitored. Water collected for treatment will include both contaminated groundwater and adit discharges. Surface water will not be collected directly from tributaries and the SFCDR.

Problems from stream flow reduction are not expected but, if any were to occur, collection rates could be modified to minimize or eliminate any problems. In addition, adit discharges currently slated for treatment at the CTP could be treated onsite using semi-passive technologies. Following treatment at the CTP, the same volume of clean water will return to the SFCDR at Kellogg, albeit downstream from onsite treatment locations. Onsite treatment of the adit discharges involves smaller, semi-passive systems and returns the collected water back to the water body from which it came, resulting in no net reduction in stream flow. The flow rate of adit discharges to be collected is uncertain at this time. Adit discharge flow rates will be determined during design. Early activities will include the sampling of adit discharge flows under both low- and high-flow conditions to inform planning for future water treatment actions and evaluation of projected stream flow reductions, including adit discharges.

Some comments received during the public comment period have speculated that water treatment will eliminate or greatly reduce water flows. These comments are flawed in that they are based on impossible flow scenarios. For example, maximum groundwater and adit discharge flows, which only take place under high-flow conditions (conditions during peak runoff periods as occur in spring runoff or rain-on-snow events), were compared to the lowest flow conditions, which happen during dry periods like late summer and early fall. This

logic is flawed. Peak flows do not occur during the dry season. Therefore, any assessment of stream flow reduction must consider both stream flows and projected groundwater and adit discharge collection under the same flow regime (i.e., comparison of high-flow to high-flow and low-flow to low-flow conditions).

States' Rights – EPA is a federal agency, but Idaho water belongs to the state.

Collection of contaminated groundwater and adit discharges is a key component of the Selected Remedy and will provide immediate improvements in water quality and address areas where source control actions are not feasible. The State of Idaho has legislated law concerning the use of water belonging to the State. That Idaho State water law is an ARAR for the selected remedy. EPA will comply with Idaho State water law as an ARAR and in accordance with CERCLA.

Repositories – The EPA plan calls for 5-6 new repositories for contaminated rock and soil – all together, and area the size of 28 football fields stacked 50 feet high.

The Selected Remedy does call for significant excavation and consolidation of contaminated materials in either engineered repositories or "waste consolidation areas". For the purposes of the Selected Remedy, repositories are considered to be large, centrally located areas within the Upper Basin where contaminated soil excavated during cleanup actions is transported to, managed, and secured. EPA's preference will be to locate repositories in areas that are already contaminated, such as on top of historical mine tailings piles. The Big Creek Repository, Page Repository, Osburn Tailings Ponds, and Star Ponds are examples of former tailings impoundments that either have been or could be turned into cleanup repositories. Repositories help protect people and the environment by dramatically decreasing the chance that people and wildlife will be exposed to metals-contaminated soil, sediment, and debris. Without repositories, cleanup cannot proceed and the public will continue to be exposed to high metals levels. Repositories constructed under the Selected Remedy will be engineered to securely contain waste materials, which will prevent contaminants from being released to surface water, groundwater, or air at concentrations above State and/or federal standards.

Waste consolidation areas will differ from the centrally located repositories. Waste consolidated areas will be established within tributary watersheds (e.g., the Ninemile and Canyon Creek Watersheds) in areas where significant volumes of waste are already present from historical mine and mill site operations. Rather than haul these wastes out of the watershed to a regional repository, EPA's first step will be to look for locations to safely consolidate and cap wastes at the particular mine and mill site being cleaned up or in another area of the watershed where the consolidated waste can be better protected from surface water runoff and erosion. This approach will significantly reduce the number of haul trucks driving through communities such as Woodland Park, Wallace, and Mullan. The approach has already been used successfully in the Upper Basin and, as a result, the volume of soil hauled to repositories has been minimized. Good examples of the successful use of waste consolidation areas include the Moon Creek Watershed and the Golconda Mine near Wallace. Pre-design investigation work has also led to the identification of a location for waste consolidation in the East Fork Ninemile Creek drainage. Based on this new information, select cleanup methods for sites in the Ninemile drainage have been modified to optimize the use of this local waste consolidation area and eliminate the need for regional repository space for these materials.

EPA, IDEQ, and the Basin Commission are working together to identify locations for new repositories in the Upper Basin. There are many opportunities for community involvement in repository siting. To learn more, please contact Don Carpenter, IDEQ, at 208-373-0141 or Ed Moreen, EPA, at 208-664-4588, or visit: http://basincommission.com/TLG_PFT_Repository.asp.

National Academy of Sciences – This plan is based on a flawed model and ignores many NAS recommendations.

In 2002, Congress instructed EPA to ask the National Research Council (NRC) to conduct an independent evaluation of the Bunker Hill Superfund Site. The NRC established the Committee on Superfund Site Assessment and Remediation in the Coeur d'Alene Basin to evaluate the 2002 ROD for OU 3 (EPA, 2002; www.epa.gov/superfund/sites/rods/fulltext/r1002032.pdf) and supporting documents, and to examine EPA's scientific and technical practices at the Site. NAS issued its resulting report in 2005 (National Academy of Sciences, 2005, http://www.epa.gov/superfund/accomp/coeur/).

The report's conclusions and recommendations cover the remedial investigation, human health risk assessment, and ecological risk assessment of the Coeur d'Alene Basin, and remediation objectives and approaches. Many of the recommendations relate to EPA's approach to protection of the environment

presented in the 2002 ROD for OU 3 and the 2001 Feasibility Study (FS) Report (EPA, October 2001, *Final [Revision 2] Feasibility Study Report, Coeur d'Alene Basin Remedial Investigation/Feasibility Study*). The NAS review validated much of the 2002 ROD for OU 3, and the recommendations for areas of improvement primarily focused on ecological protection. EPA carefully considered the NAS report and its recommendations, and conducted studies and evaluations to address the major recommendations. The results of those efforts are reflected in the actions identified in the Upper Basin Selected Remedy. EPA believes the Selected Remedy presented in the ROD Amendment addresses the NAS report's recommendations, while recognizing EPA's statutory obligations under CERCLA.

Since the ROD for OU 3 was issued in 2002 and the NAS report in 2005, EPA has continued to collect environmental data and conduct additional studies throughout the Coeur d'Alene Basin, particularly in the Upper Basin. The additional data and studies have improved EPA's understanding of the Upper Basin, and enabled EPA to address key NAS recommendations involving: the fate and transport of dissolved metals in the subsurface; the role that groundwater plays in contaminant loading to surface water; approaches to groundwater treatment; the development of predictive tools to assess the effectiveness of remedial actions; evaluation of the SFCDR Watershed as a whole, including the Bunker Hill Box; and improving the use of the adaptive management approach.

The Predictive Analysis (PA) is a tool that can be used to estimate how effective proposed remedial actions will be in relation to projected improvements to surface water quality. The PA was first developed to support the evaluation of alternatives in the 2001 FS Report. It was later used to support evaluations in the ROD for OU 3 and the FFS Report for the Upper Basin. The Upper Basin covers a large geographic area, and predicting the potential effectiveness of hundreds of individual remedial actions across the entire Upper Basin is a significant challenge. The PA provided a means of addressing this challenge. Using the basic principle of mass balance (i.e., if 10 lb. of zinc are present at a site and 9 are removed, 1 lb. remains), the PA provided estimates of remedial effectiveness on an Upper-Basin-wide scale that could be used in comparing alternatives.

The development of the PA (referred to as the Probabilistic Analysis at the time of the 2002 ROD for OU 3) was first documented in a 2001 technical memorandum (URS Greiner, September 2001, *Technical Memorandum [Revision 1]: Probabilistic Analysis of Post-Remediation Metal Loading, prepared for EPA Region 10*). The PA and associated documentation were reviewed as part of the NAS review (see Appendix F in National Academy of Sciences, 2005, http://www.epa.gov/superfund/accomp/coeur/). That review raised questions about the methods and assumptions used to develop the PA. Following the NAS review, EPA sought an independent review of the PA by a well-known leader in the field of probabilistic modeling, Dr. Gregory B. Baecher, University of Maryland, A.J. Clark School of Engineering (College Park, MD). The purpose of Dr. Baecher's review was to address questions raised by the NAS review.

Dr. Baecher's review validated EPA's use of the PA in the evaluation and comparison of remedial alternatives. This review culminated in a second memorandum, *A Predictive Analysis of Post-Remediation Metals Loading* (EPA, 2007, http://yosemite.epa.gov/R10/CLEANUP.NSF/6ea33b02338c3a5e882567ca005d382f/97c56add3adf946788257559007716 91/$FILE/CDA%20Final%20Tech%20Memo.pdf), which provided clarification and additional documentation related to the PA. However, the fundamentals of the analysis have remained unchanged since it was first developed for the 2001 FS. The following is an excerpt from Dr. Baecher's transmittal letter for the 2007 memorandum, which summarizes his findings related to the PA: "In my opinion, the Predictive Analysis strikes a reasonable balance between the needs of the Remedial Investigation and Feasibility Study to chart a course forward, and the difficulty of acquiring sufficient data on the basin from which to analyze conditions in a statistically exhaustive way. The approach taken by the Predictive Analysis is the traditional one of using professional judgment -- both engineering and scientific -- to form assumptions and to make estimates of parameter values, boundary conditions, and initial conditions. In my opinion, this is sound engineering practice."

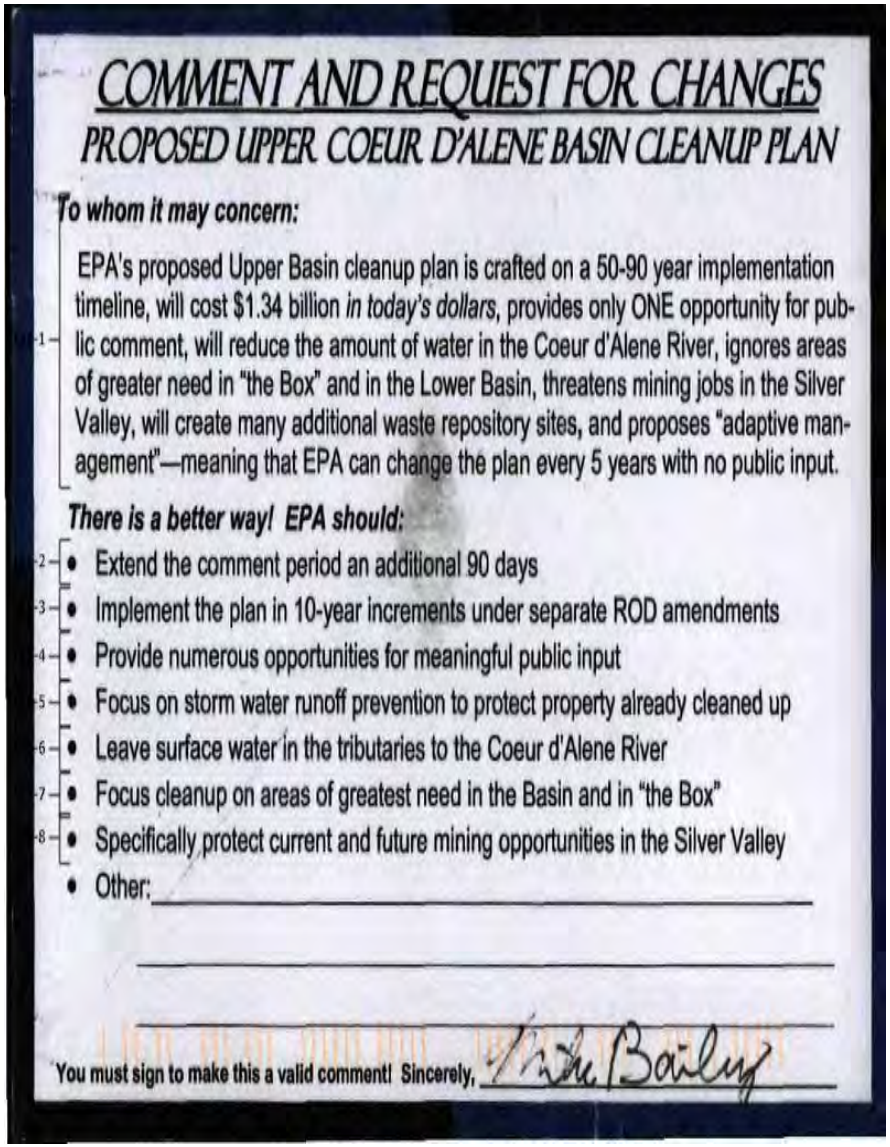
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

Response: EPA does not believe that Hecla's 10-Year Plan is comprehensive enough to protect human health and the environment throughout the Upper Basin. Most of the sites identified in Hecla's 10-Year Plan are also priority sites in EPA's Selected Remedy. However, the actions included in Hecla's 10-Year Plan only address a fraction of the contamination that needs to be and is addressed under EPA's Selected Remedy. Hecla's 10-Year Plan also relies heavily on less protective remedial actions such as "toe pull-back" (moving the base of waste piles away from creeks and the SFCDR), regrading, soil capping, and

revegetation. Furthermore, elements of Hecla's 10-Year Plan may not be technically feasible. For example, the plan calls for contaminated adit and seep discharges to be collected and treated at lagoon-type systems which, as proposed, have serious technical flaws and are not likely possible to implement.

In contrast to Hecla's 10-Year Plan, EPA's Selected Remedy identifies effective and proven actions. For example, the remedy includes methods such as excavation of highly contaminated floodplain sediments and tailings, and groundwater collection and treatment, to address contamination that is inaccessible for removal (such as materials located beneath roads and communities). EPA believes these actions will be more effective in reducing metals loading to the SFCDR and its tributaries, and will more comprehensively protect human health and the environment.

Bailey, Mike, I35, Letter 1357079



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I-2 Extend the comment period an additional 90 days
- I-3 Implement the plan in 10-year increments under separate ROD amendments
- I-4 Provide numerous opportunities for meaningful public input
- I-5 Focus on storm water runoff prevention to protect property already cleaned up
- I-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Mike Bailey

Response to comment I35-1
See response to Comment No. I25-1.

Response to comment I35-2
See response to Comment No. I25-2.

Response to comment I35-3
See response to Comment No. I25-3.

Response to comment I35-4
See response to Comment No. I25-4.

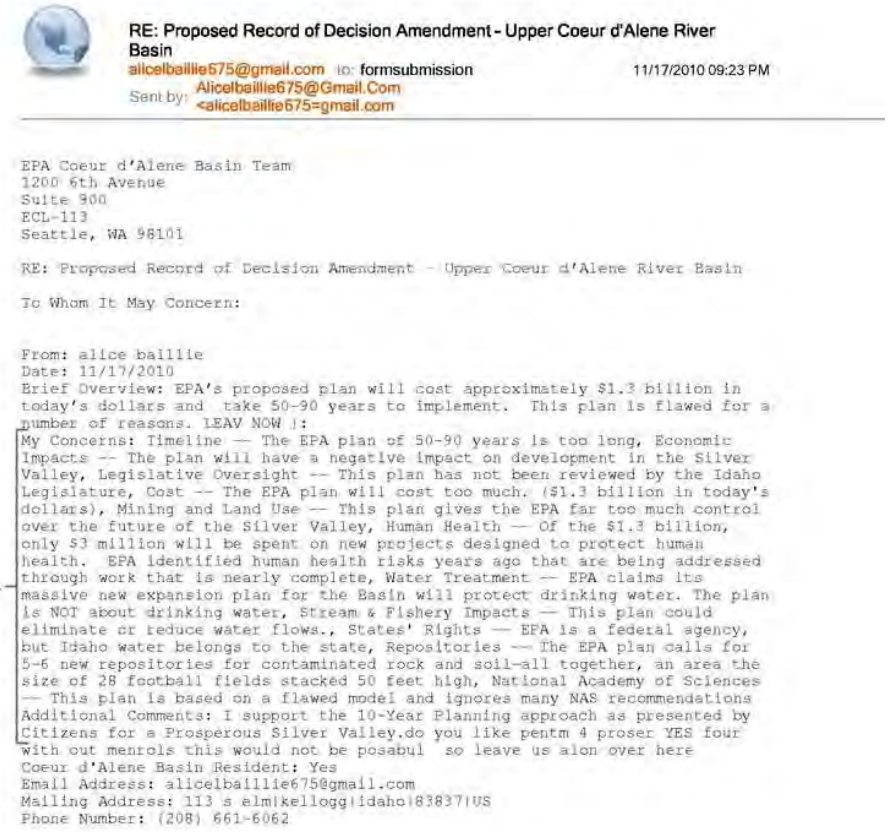
Response to comment I35-5
See response to Comment No. I25-5.

Response to comment I35-6
See response to Comment No. I25-6.

Response to comment I35-7
See response to Comment No. I25-7.

Response to comment I35-8
See response to Comment No. I25-8.

Baillie, Alice, I531, Letter 617273



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

alicelbaillie675@gmail.com to: formsubmission 11/17/2010 09:23 PM

Sent by: Alicelbaillie675@Gmail.Com <alicelbaillie675=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: alice baillie
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. LEAV NOW):
I531-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.do you like pentm 4 proser YES four with out menrols this would not be posabul so leave us alon over here
Coeur d'Alene Basin Resident: Yes
Email Address: alicelbaillie675@gmail.com
Mailing Address: 113 s elm|kellogg|idaho|83837|US
Phone Number: (208) 661-6062

617273

Response to comment I531-1

See response to Comment No. I351-1.

Baillie, Melvin, I530, Letter 617272

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
melvin.baillie@gmail.com to: formsubmission 11/17/2010 09:14 PM
Sent by: Melvin.Baillie@Gmail.Com <melvin.baillie=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: melvin baillie
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. EPA IS FLAWED
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. JUST GO AWAY EPA YOU ARE NOT NEEDED GO PICK ON NEWS RIVER IN NORTHCAROLNA WHERE THERE IS FISH KILLS Mel Baillie
kellogg id
Coeur d'Alene Basin Resident: Yes
Email Address: melvin.baillie@gmail.com
Mailing Address: 113 s elm, 113 s elm|kellogg|Idaho|83837|US
Phone Number: (208) 661-6162

I530-1

I530-2

617272

Response to comment I530-1

See response to Comment No. I351-1.

Response to comment I530-2

Comment noted.

Bair, Geri, I532, Letter 617274

Listen Up EPA
Geri Bair
to:

11/20/2010 05:49 PM
Cc:
CDABasin
Show Details

Dear EPA;

LISTEN! LISTEN! LISTEN!

I532-1 I have attended several public meetings here in the Silver Valley. ALL of you refuse to listen to the residents who live here. ENOUGH, is enough.

I532-2 A ten year plan with all costs lined out is more acceptable then 50 to 90 years. You just want to control our water rights and gain big profits in your pockets. Once the water is clean?? Then a bird gets a drink and then OH we better clean up this water again because the bird contaminated the water. Next it will be our trees are contaminated and need to be removed. Leave our natural area alone. God will take care of his world in his own time. I532-3

I532-4 I live up Nine Mile and I don't want the creek beside my house covered over or changed. I enjoy the sound of the creek each night and in the evenings during the summer.

I532-5 People who thought of moving here—hear about the control of EPA in this valley and they want no part of living here. Some people have told me what you have done in Colorado.

I have had enough of the government trying to control my life. ENOUGH—IS ENOUGH!! LISTEN to those of us who have lived here all our life and I even played in these creeks as a small child and I'm still alive and healthy!!

Sincerely,
Geraldine L. Bair
481 Nine Mile Road
Wallace, Idaho 83873

617274

Response to comment I532-1
See response to Comment No. I295-2.

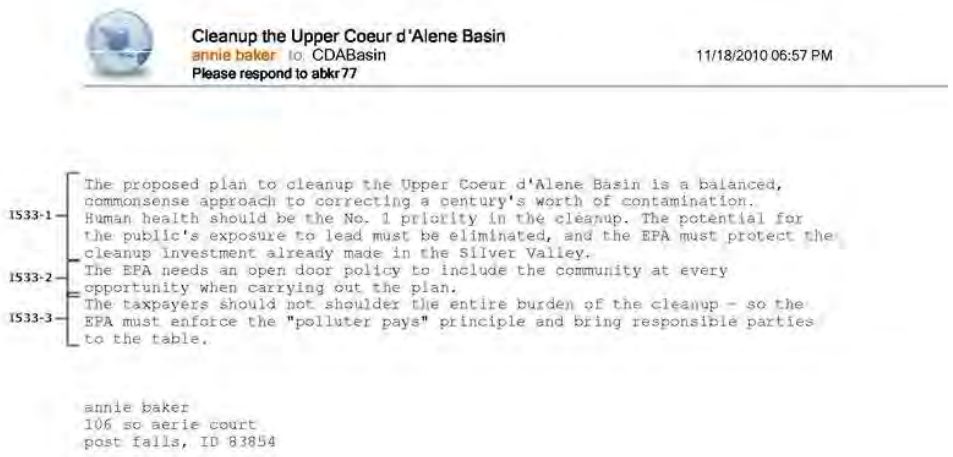
Response to comment I532-2
See response to Comment No. I58-1 regarding duration of cleanup. See response to Comment No. SA4-12 regarding water rights.

Response to comment I532-3
Comment noted.

Response to comment I532-4
Thank you for your comment.

Response to comment I532-5
Comment noted.

Baker, Annie, I533, Letter 617275



Cleanup the Upper Coeur d'Alene Basin
annie baker to: CDABasin 11/18/2010 06:57 PM
Please respond to abkr77

I533-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I533-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I533-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

annie baker
106 so aerie court
post falls, ID 83854

617275

Response to comment I533-1

See response to Comment No. I295-1.

Response to comment I533-2

See response to Comment No. I295-2.

Response to comment I533-3

See response to Comment No. I295-3.

Bales, Stephany, I905, Letter 616236

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
stefany_bales@hotmail.com to: formsubmission 11/15/2010 09:03 AM
Sent by: Stefany_bales@Hotmail.Com <stefany_bales=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: stefany bales
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I905-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: stefany_bales@hotmail.com
Mailing Address:
Phone Number:

616236

Response to comment I905-1

See response to Comment No. I351-1.

Banks, Bill, I2, Letter 896725

amendment to the 2002 ROD
bill banks to: CDABasin 08/03/2010 03:20 PM

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I2-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion in today's dollars. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point

I2-2 the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about

I2-3 something that will potentially affect me, my job, my family, and my life until the year 2100. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement

I2-4 the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming

I2-5 around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments–I hope that they are actually incorporated into the final plan.

Sincerely,
William O. Banks

896725

Response to comment I2-1
See response to Comment No. I58-1.

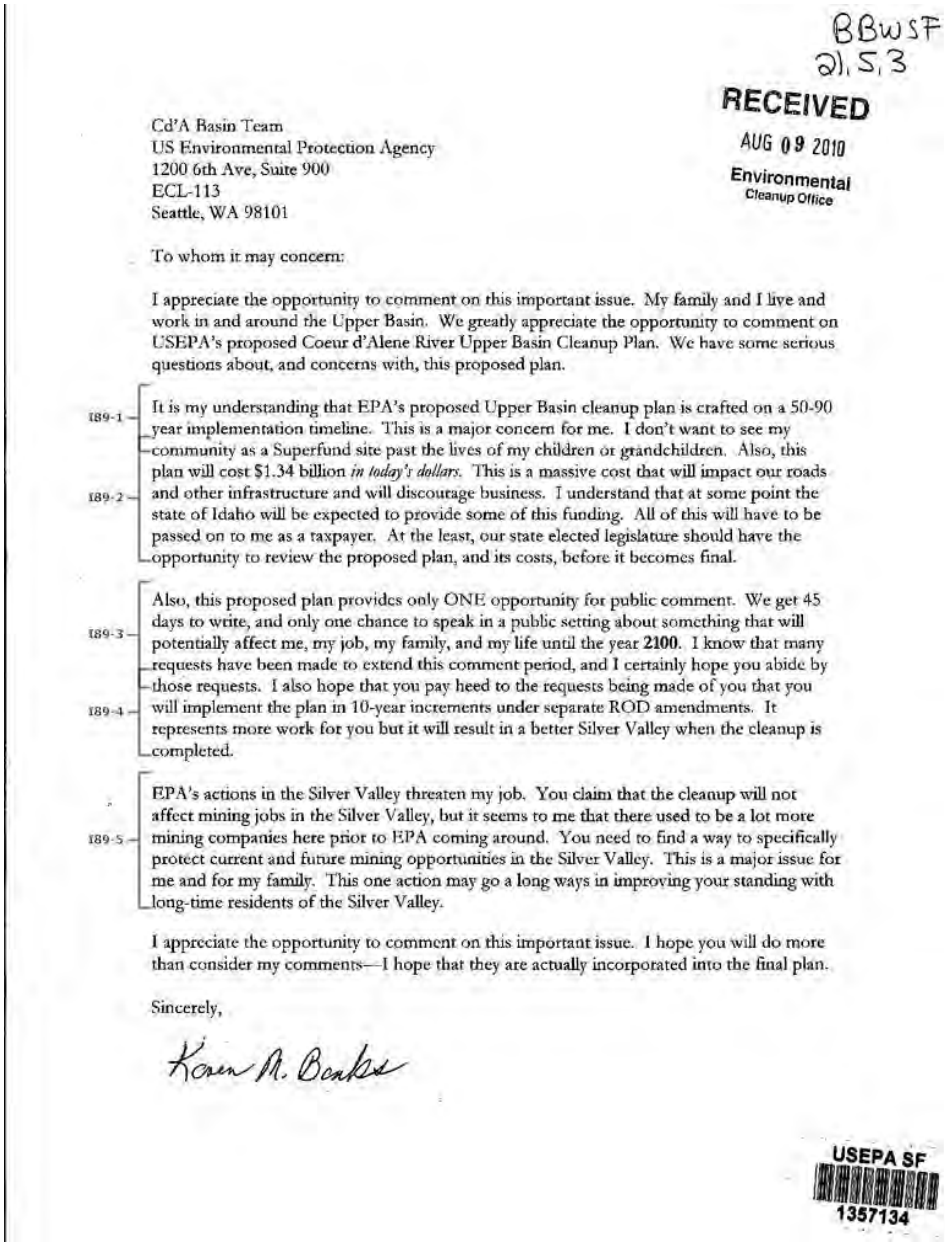
Response to comment I2-2
See responses to Comment Nos. I58-2 and LJ39-5.

Response to comment I2-3
See responses to Comment Nos. I54-6 and I295-2.

Response to comment I2-4
See responses to Comment Nos. I58-4 and I474-2.

Response to comment I2-5
See response to Comment No. I58-5.

Banks, Karen, I89, Letter 1357134



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I89-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I89-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I89-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I89-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I89-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Karen M. Banks

USEPA SF
1357134

Response to comment I89-1
See response to Comment No. I58-1.

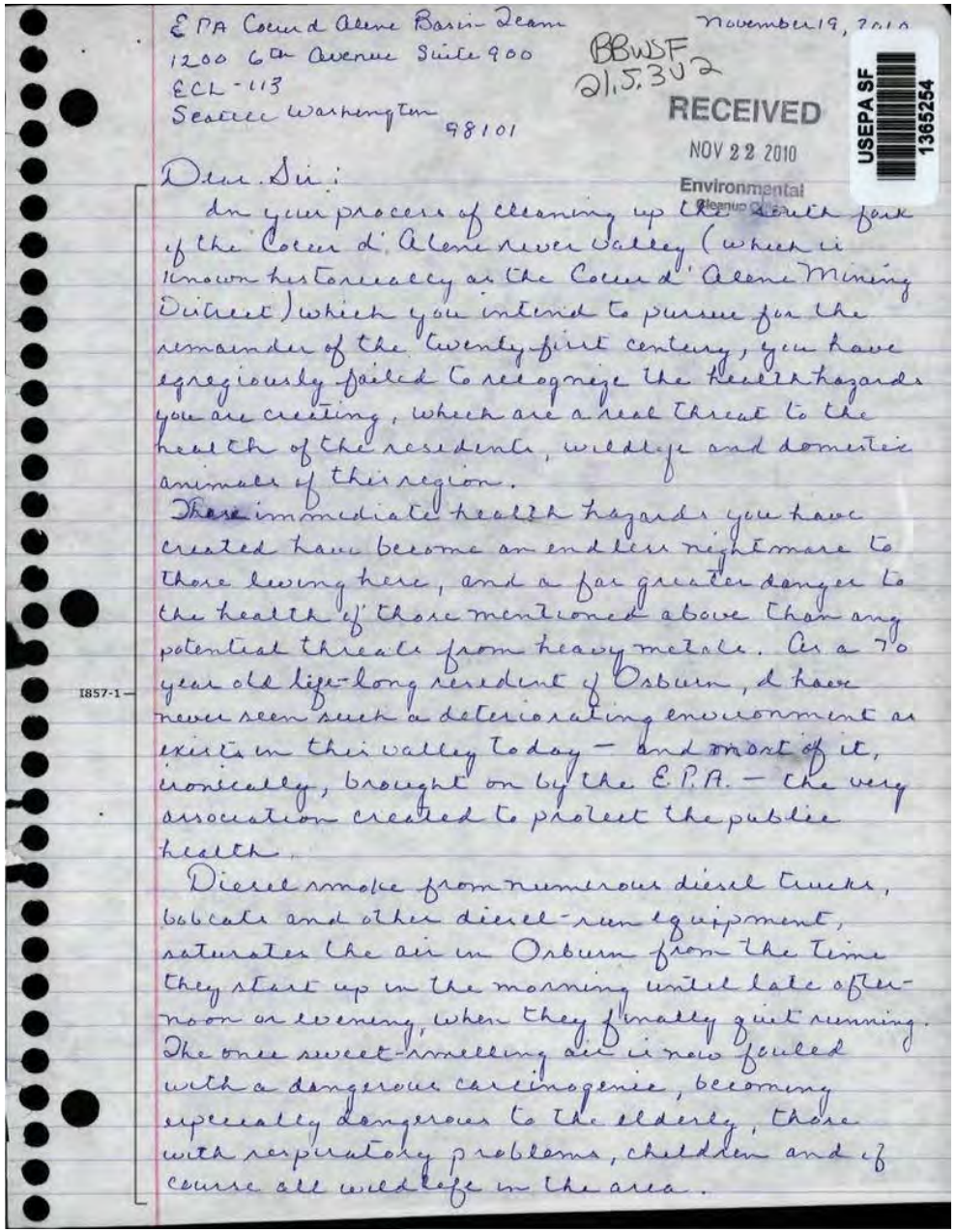
Response to comment I89-2
See response to Comment No. I58-2.

Response to comment I89-3
See response to Comment No. I58-3.

Response to comment I89-4
See response to Comment No. I58-4.

Response to comment I89-5
See response to Comment No. I58-5.

Bardelli, Fred, I857, Letter 1365254



EPA Coeur d Alene Basin Team
1200 6th Avenue Suite 900
ECL-113
Seattle Washington 98101

November 19, 2010

BBWSF
21.5.3U2

RECEIVED
NOV 22 2010
Environmental Cleanup Office

USEPA SF
1365254

Dear Sir:

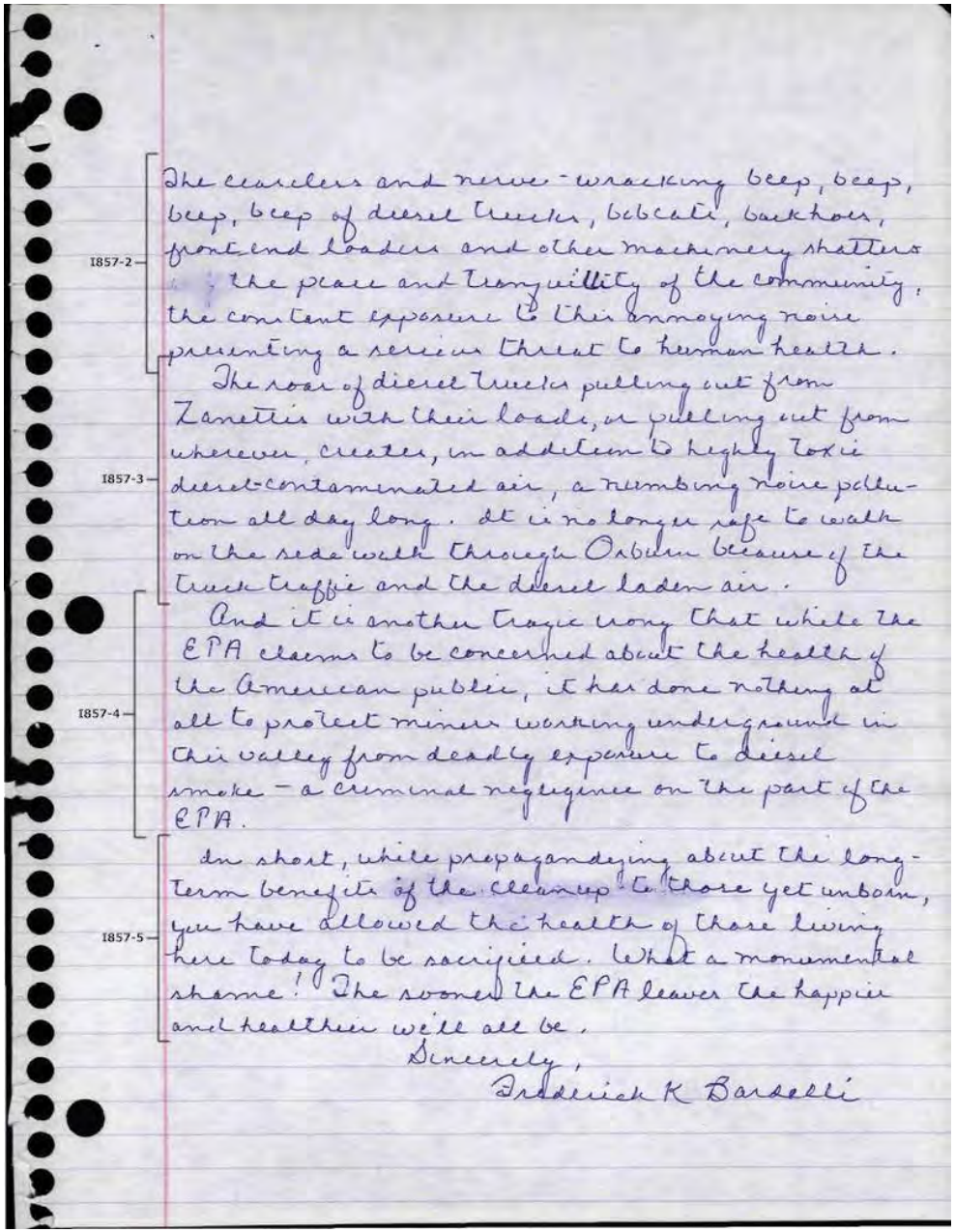
In your process of cleaning up the South fork of the Coeur d' Alene river Valley (which is known historically as the Coeur d' Alene Mining District) which you intend to pursue for the remainder of the twenty-first century, you have egregiously failed to recognize the health hazards you are creating, which are a real threat to the health of the residents, wildlife and domestic animals of this region.

I857-1 These immediate health hazards you have created have become an endless nightmare to those living here, and a far greater danger to the health of those mentioned above than any potential threats from heavy metals. As a 70 year old life-long resident of Osburn, I have never seen such a deteriorating environment as exists in this valley today – and most of it, ironically, brought on by the E.P.A. – the very association created to protect the public health.

Diesel smoke from numerous diesel trucks, bobcats and other diesel-run equipment, saturates the air in Osburn from the time they start up in the morning until late afternoon or evening, when they finally quit running. The once sweet-smelling air is now fouled with a dangerous carcinogenic, becoming especially dangerous to the elderly, those with respiratory problems, children and of course all wildlife in the area.

Response to comment I857-1

Thank you for your comment. Most of the Selected Remedy cleanup work will be in the areas of greatest contamination which are generally in less populated areas higher in stream drainages. With much of the Selected Remedy work planned for outside community areas such as Osburn, impacts to local residents and businesses are expected to be significantly less than experienced during yard cleanup work in the residential areas.



I857-2 The clanking and nerve-wracking beep, beep, beep, beep of diesel trucks, bobcats, backhoes, front end loaders and other machinery shatters the peace and tranquillity of the community, the constant exposure to this annoying noise presenting a serious threat to human health.

I857-3 The roar of diesel trucks pulling out from Zanetti's with their loads, or pulling out from wherever, creates, in addition to highly toxic diesel-contaminated air, a numbing noise pollution all day long. It is no longer safe to walk on the side walk through Osburn because of the truck traffic and the diesel laden air.

I857-4 And it is another tragic irony that while the EPA claims to be concerned about the health of the American public, it has done nothing at all to protect miners working underground in this valley from deadly exposure to diesel smoke – a criminal negligence on the part of the EPA.

I857-5 In short, while propagandizing about the long-term benefits of the cleanup to those yet unborn, you have allowed the health of those living here today to be sacrificed. What a monumental shame! The sooner the EPA leaves the happier and healthier we'll all be.

Sincerely,
Frederick K Bardelli

Response to comment I857-2

Thank you for your comment. While some disruption is unavoidable, EPA will continue to work to minimize the impact cleanup work has on nearby residents and businesses.

Response to comment I857-3

Comment noted. To the extent practical, EPA schedules field work hours to minimize impacts to local residents. Some disruption during cleanup is unfortunately unavoidable.

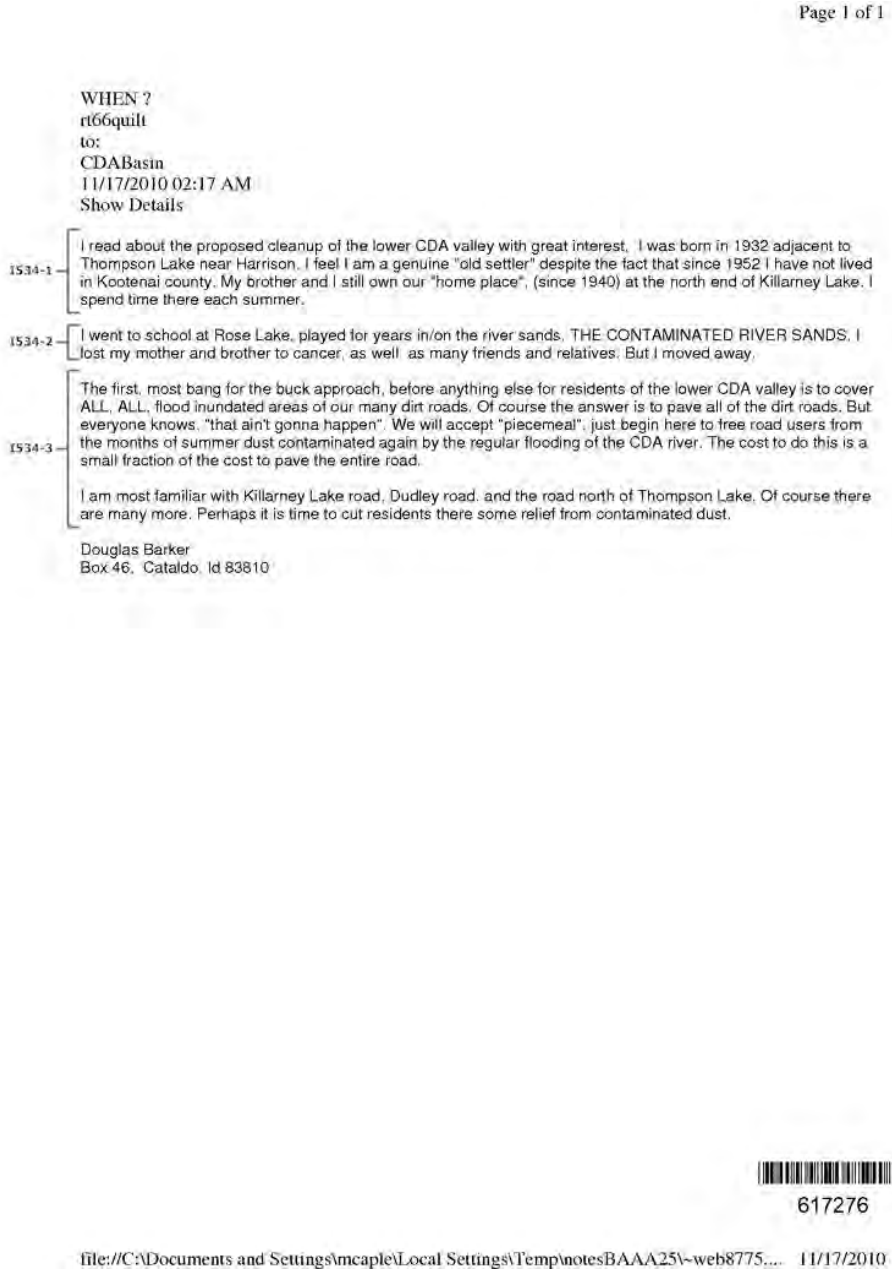
Response to comment I857-4

The Selected Remedy focuses on cleanup of historical mining-related contamination. The EPA does not regulate mine safety and that is the responsibility of other federal agencies such as the U.S. Department of Labor and the Mine Safety and Health Administration (MSHA).

Response to comment I857-5

Comment noted.

Barker, Douglas, I534, Letter 617276



Page 1 of 1

WHEN ?
rt66quilt
to:
CDABasin
11/17/2010 02:17 AM
Show Details

I534-1 I read about the proposed cleanup of the lower CDA valley with great interest, I was born in 1932 adjacent to Thompson Lake near Harrison. I feel I am a genuine "old settler" despite the fact that since 1952 I have not lived in Kootenai county. My brother and I still own our "home place", (since 1940) at the north end of Killarney Lake. I spend time there each summer.

I534-2 I went to school at Rose Lake, played for years in/on the river sands. THE CONTAMINATED RIVER SANDS. I lost my mother and brother to cancer, as well as many friends and relatives. But I moved away.

I534-3 The first, most bang for the buck approach, before anything else for residents of the lower CDA valley is to cover ALL, ALL, flood inundated areas of our many dirt roads. Of course the answer is to pave all of the dirt roads. But everyone knows, "that ain't gonna happen". We will accept "piecemeal", just begin here to free road users from the months of summer dust contaminated again by the regular flooding of the CDA river. The cost to do this is a small fraction of the cost to pave the entire road.

I am most familiar with Killarney Lake road, Dudley road, and the road north of Thompson Lake. Of course there are many more. Perhaps it is time to cut residents there some relief from contaminated dust.

Douglas Barker
Box 46, Cataldo, Id 83810

617276

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web8775.... 11/17/2010

Response to comment I534-1

Thank you for your comment.

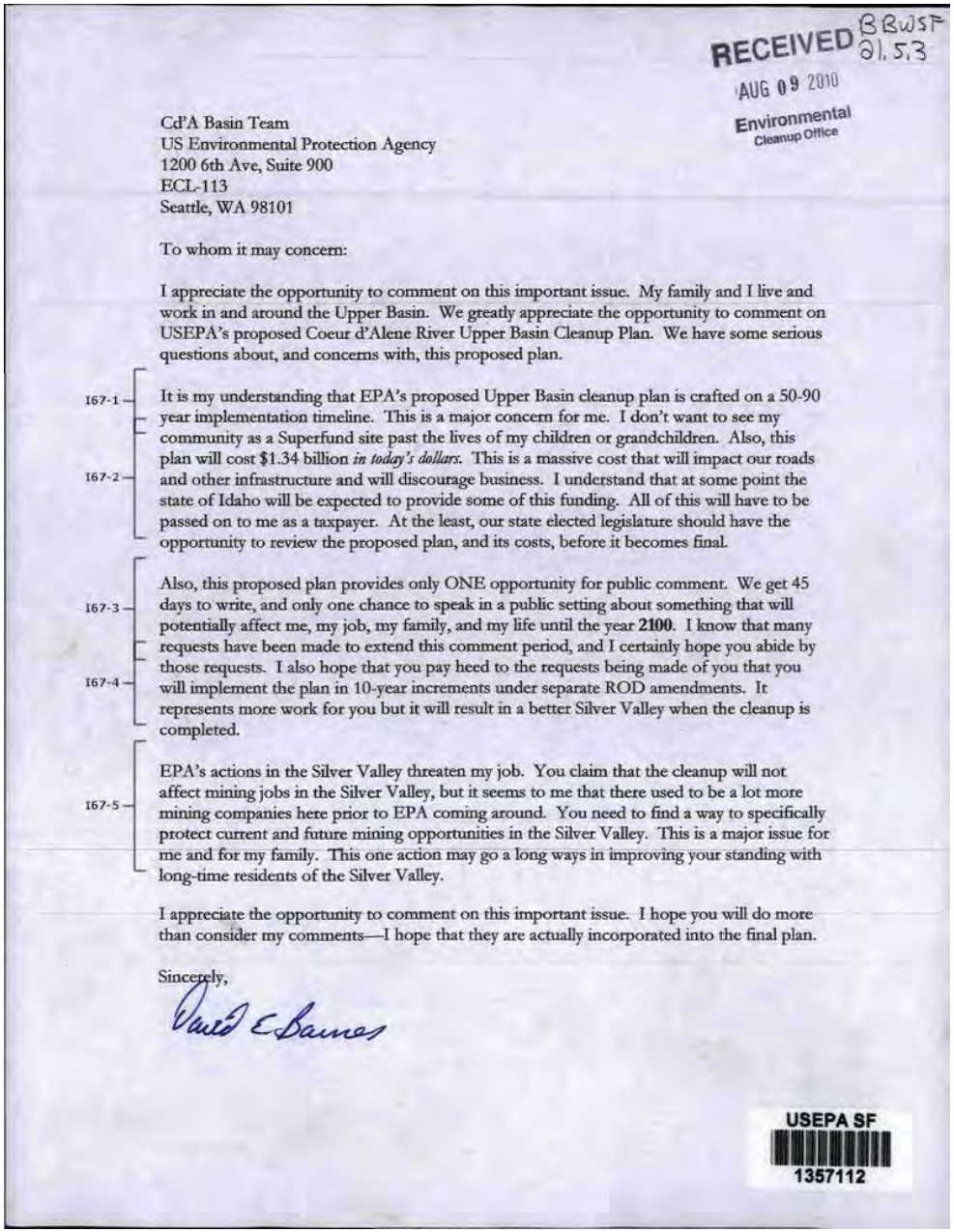
Response to comment I534-2

Thank you for your comment.

Response to comment I534-3

The Upper Basin ROD Amendment does not select any remedies for the Lower Basin. The RODs for OUs 1, 2, and 3 address cleanup of rights-of-way (ROWs) in the Bunker Hill Box and the Coeur d'Alene Basin, as appropriate, to respond to risks to human health. The RODs allow ROWs to be cleaned up such that they provide barriers to underlying metals contamination. Many ROWs have been cleaned up as residential and commercial properties have been remediated in Box and Basin communities. However, EPA and IDEQ recognize that some pre-existing paved roadways may not provide adequate long-term barriers to underlying contaminated material, and that local and state entities are responsible for the long-term road development and maintenance efforts. As a result, the agencies are developing an approach under the existing RODs to address this issue collaboratively with local, county, and state entities responsible for providing and maintaining roadways in their communities. The objective of this effort is to develop and implement a strategy that ensures the long-term effectiveness of barriers installed in ROWs, and also aligns with the transportation and maintenance needs of the Box and Basin communities.

Barnes, David, I67, Letter 1357112



RECEIVED
AUG 09 2010
Environmental Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I67-1, I67-2: It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I67-3, I67-4: Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I67-5: EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

David E Barnes

USEPA SF
1357112

Response to comment I67-1
See response to Comment No. I58-1.

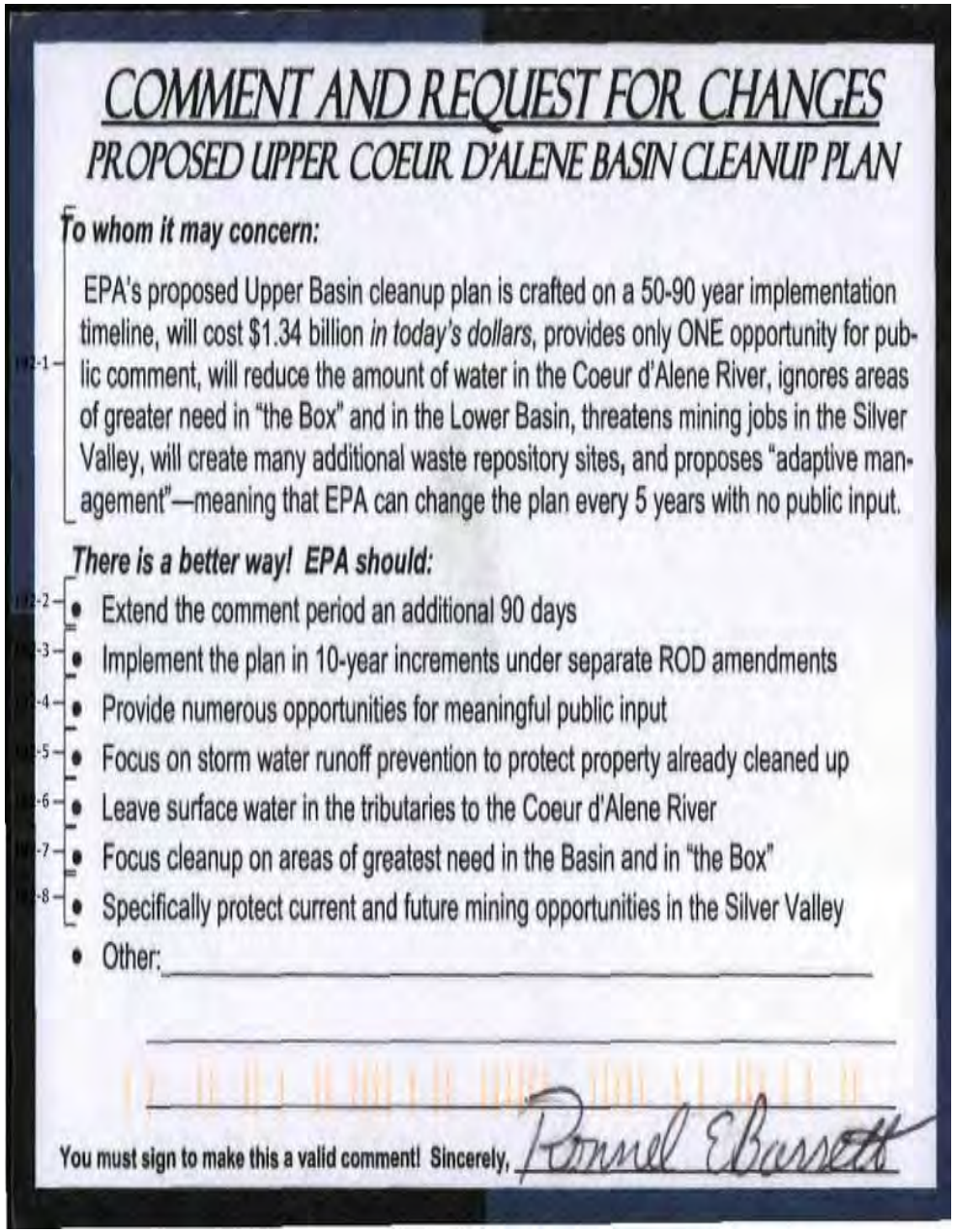
Response to comment I67-2
See response to Comment No. I58-2.

Response to comment I67-3
See response to Comment No. I58-3.

Response to comment I67-4
See response to Comment No. I58-4.

Response to comment I67-5
See response to Comment No. I58-5.

Barrett, Ronnel, I92, Letter 1357139



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I92-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I92-2 • Extend the comment period an additional 90 days
I92-3 • Implement the plan in 10-year increments under separate ROD amendments
I92-4 • Provide numerous opportunities for meaningful public input
I92-5 • Focus on storm water runoff prevention to protect property already cleaned up
I92-6 • Leave surface water in the tributaries to the Coeur d'Alene River
I92-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
I92-8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other: _____

You must sign to make this a valid comment! Sincerely, Ronnel E Barrett

Response to comment I92-1
See response to Comment No. I25-1.

Response to comment I92-2
See response to Comment No. I25-2.

Response to comment I92-3
See response to Comment No. I25-3.

Response to comment I92-4
See response to Comment No. I25-4.

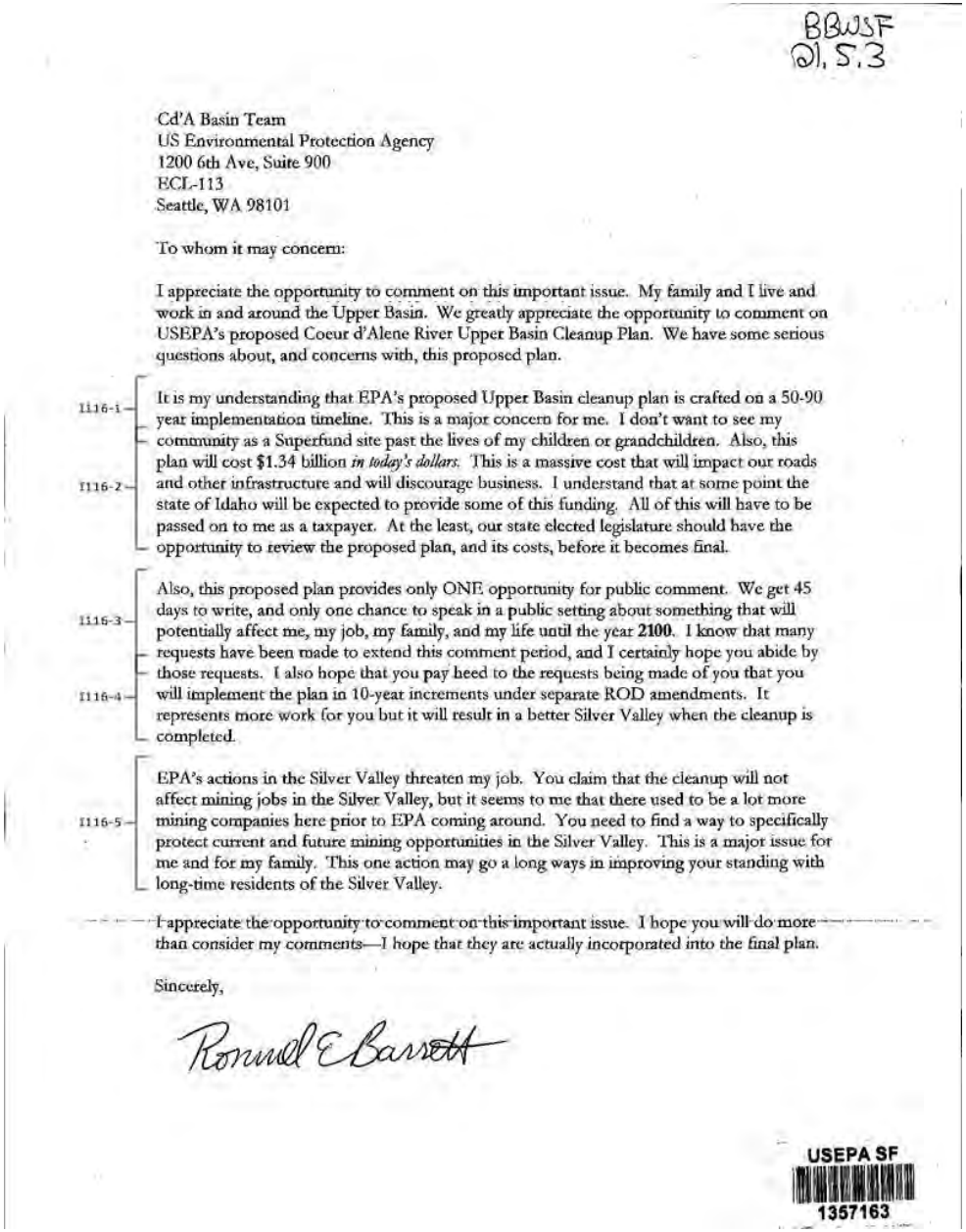
Response to comment I92-5
See response to Comment No. I25-5.

Response to comment I92-6
See response to Comment No. I25-6.

Response to comment I92-7
See response to Comment No. I25-7.

Response to comment I92-8
See response to Comment No. I25-8.

Barrett, Ronnel, I116, Letter 1357163



BBWSF
01.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I116-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I116-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I116-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I116-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I116-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Ronnel E Barrett

USEPA SF
1357163

Response to comment I116-1
See response to Comment No. I58-1.

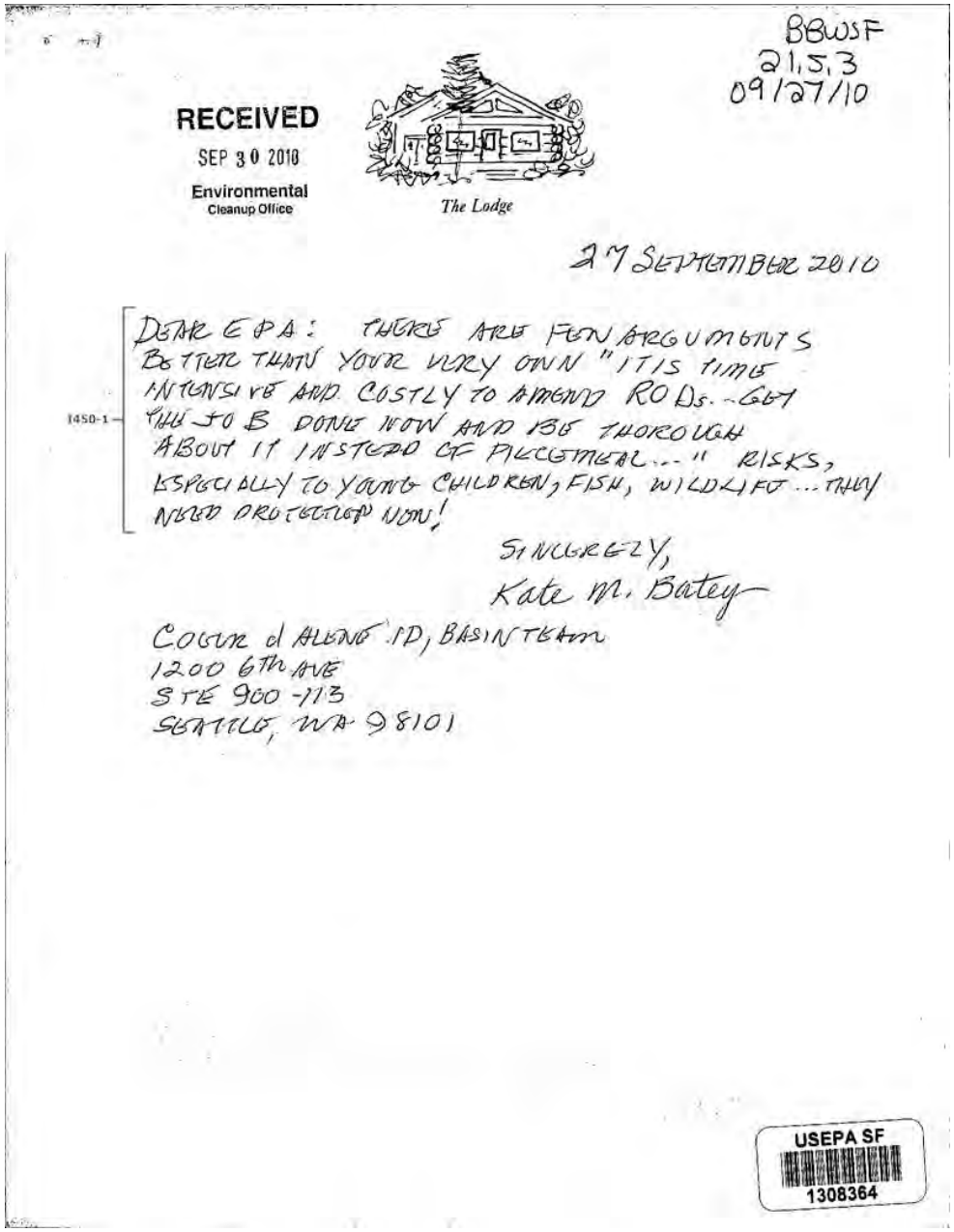
Response to comment I116-2
See response to Comment No. I58-2.

Response to comment I116-3
See response to Comment No. I58-3.

Response to comment I116-4
See response to Comment No. I58-4.

Response to comment I116-5
See response to Comment No. I58-5.

Batey, Kate, I450, Letter 1308364



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09/27/10

RECEIVED
SEP 30 2010
Environmental
Cleanup Office

The Lodge

27 SEPTEMBER 2010

DEAR EPA: THERE ARE FEW ARGUMENTS BETTER THAN YOUR VERY OWN "IT IS TIME INTENSIVE AND COSTLY TO AMEND RODs. - GET THIS JOB DONE NOW AND BE THOROUGH ABOUT IT INSTEAD OF PIECEMEAL..." RISKS, ESPECIALLY TO YOUNG CHILDREN, FISH, WILDLIFE ... THEY NEED PROTECTION NOW!

I450-1

SINCERELY,
Kate M. Batey

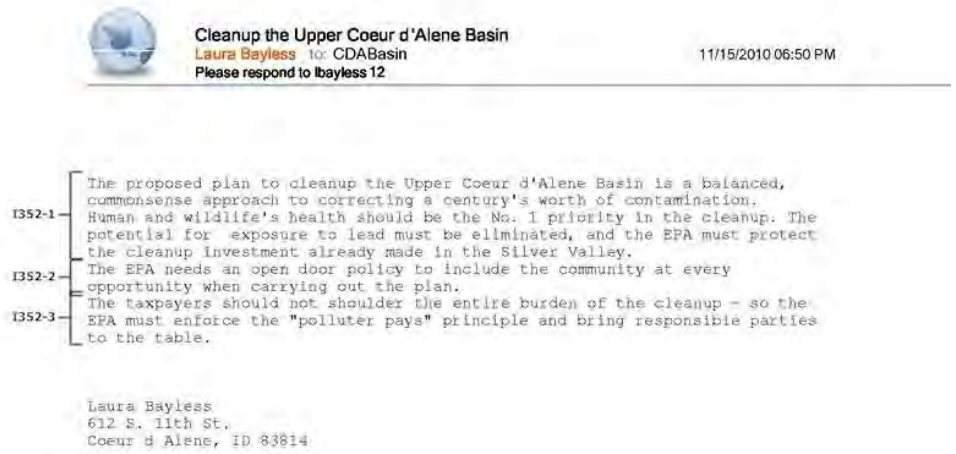
COEUR d ALENE ID, BASIN TEAM
1200 6TH AVE
STE 900 -113
SEATTLE, WA 98101

USEPA SF
1308364

Response to comment I450-1

EPA appreciates your support in urging an expeditious cleanup. EPA's goal is to complete the cleanup in the Basin as quickly as possible and with minimum disruption. EPA is required by law to ensure protection of human health and the environment. The Upper Basin is a large area with complicated contamination issues that have evolved over a long period of time. The extent and nature of the contamination will take substantial time and resources to clean up. EPA expects that implementing the Selected Remedy will lead to significant reductions in risks to human health and the environment throughout the Upper Basin.

Bayless, Laura, I352, Letter 616237



Cleanup the Upper Coeur d'Alene Basin
Laura Bayless to: CDABasin 11/15/2010 06:50 PM
Please respond to lbayless 12

I352-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human and wildlife's health should be the No. 1 priority in the cleanup. The potential for exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I352-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I352-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Laura Bayless
612 S. 11th St.
Coeur d Alene, ID 83814

616237

Response to comment I352-1

See response to Comment No. I295-1.

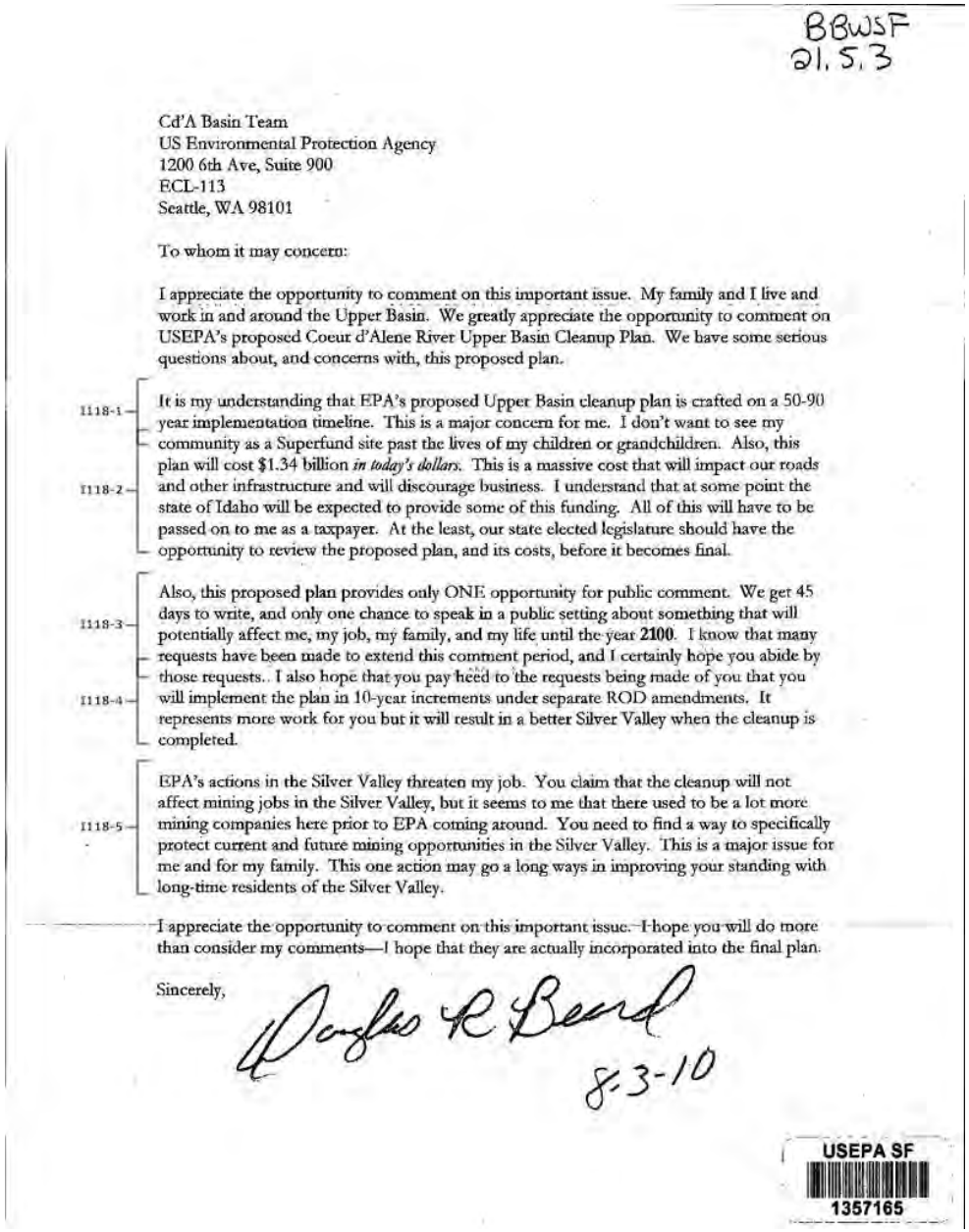
Response to comment I352-2

See response to Comment No. I295-2.

Response to comment I352-3

See response to Comment No. I295-3.

Beard, Douglas R, I118, Letter 1357165



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I118-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I118-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

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I118-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I118-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Douglas R Beard
8-3-10

USEPA SF
1357165

Response to comment I118-1
See response to Comment No. I58-1.

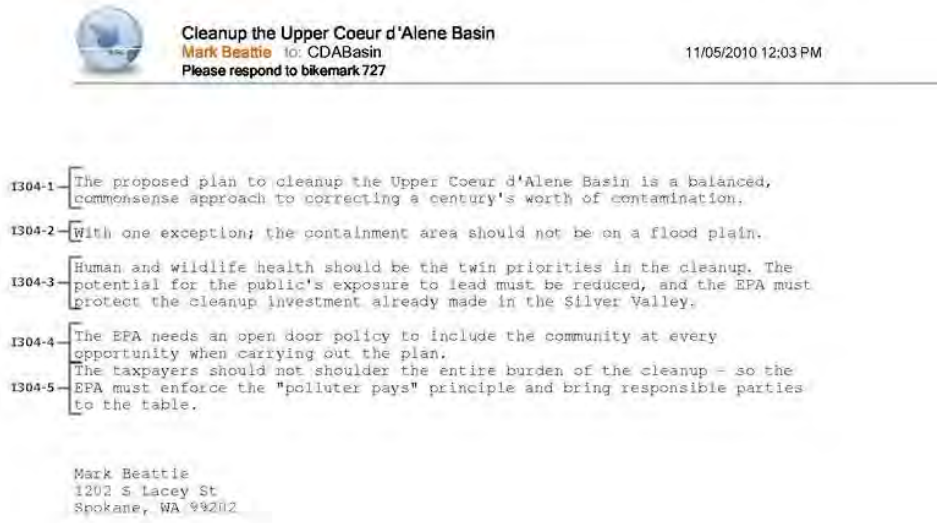
Response to comment I118-2
See response to Comment No. I58-2.

Response to comment I118-3
See response to Comment No. I58-3.

Response to comment I118-4
See response to Comment No. I58-4.

Response to comment I118-5
See response to Comment No. I58-5.

Beattie, Mark, I304, Letter 614434



Cleanup the Upper Coeur d'Alene Basin
Mark Beattie to: CDABasin 11/05/2010 12:03 PM
Please respond to bikemark727

I304-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination.

I304-2 With one exception; the containment area should not be on a flood plain.

I304-3 Human and wildlife health should be the twin priorities in the cleanup. The potential for the public's exposure to lead must be reduced, and the EPA must protect the cleanup investment already made in the Silver Valley.

I304-4 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I304-5 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Mark Beattie
1202 S Lacey St
Spokane, WA 99202

614434

Response to comment I304-1
Comment noted and appreciated.

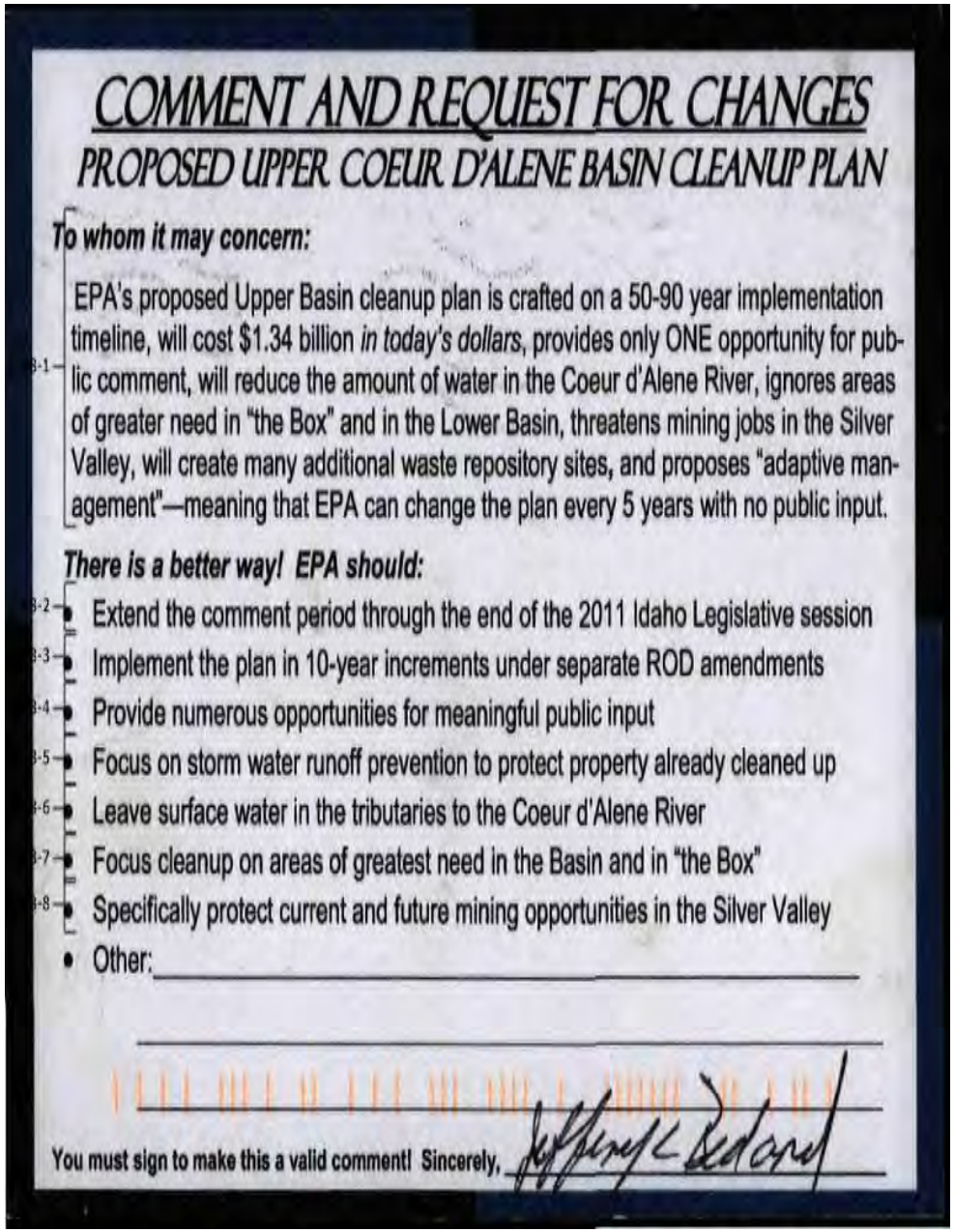
Response to comment I304-2
See response to Comment No. I54-3.

Response to comment I304-3
Comment noted and appreciated. EPA's responsibilities under CERCLA include protection of both human health and the environment. Implementing the Upper Basin Selected Remedy will make substantial progress in achieving such protection.

Response to comment I304-4
See response to Comment No. I295-2.

Response to comment I304-5
See response to Comment No. I295-3.

Bedard, Jeffrey, I198, Letter 1357510



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I198-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I198-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I198-3 Implement the plan in 10-year increments under separate ROD amendments
- I198-4 Provide numerous opportunities for meaningful public input
- I198-5 Focus on storm water runoff prevention to protect property already cleaned up
- I198-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I198-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I198-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Jeffrey C Bedard

Response to comment I198-1
See response to Comment No. I25-1.

Response to comment I198-2
See response to Comment No. I25-2.

Response to comment I198-3
See response to Comment No. I25-3.

Response to comment I198-4
See response to Comment No. I25-4.

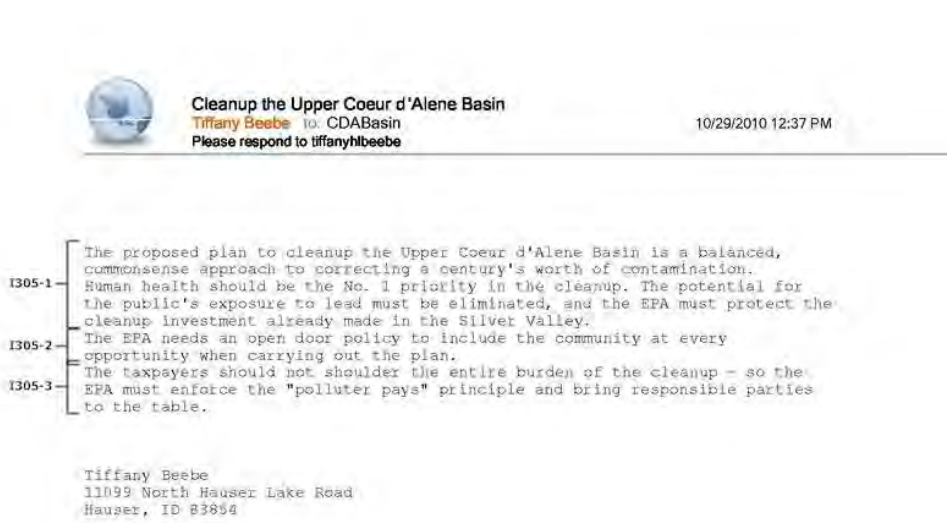
Response to comment I198-5
See response to Comment No. I25-5.

Response to comment I198-6
See response to Comment No. I25-6.

Response to comment I198-7
See response to Comment No. I25-7.

Response to comment I198-8
See response to Comment No. I25-8.

Beebe, Tiffany, I305, Letter 614435



Cleanup the Upper Coeur d'Alene Basin
Tiffany Beebe to: CDABasin 10/29/2010 12:37 PM
Please respond to tiffanyhlbeebe

I305-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I305-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I305-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Tiffany Beebe
11099 North Hauser Lake Road
Hauser, ID 83854

614435

Response to comment I305-1

See response to Comment No. I295-1.

Response to comment I305-2

See response to Comment No. I295-2.

Response to comment I305-3

See response to Comment No. I295-3.

Beehner, Don, I535, Letter 617277

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
dbeehner@ussil.com to: formsubmission 11/17/2010 02:38 PM
Sent by: Dbeehner@Ussil.Com <dbeehner=ussil.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Don Beehner
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: dbeehner@ussil.com
Mailing Address: Box 583|Kellogg|ID|83837|US
Phone Number: (208) 752-1116

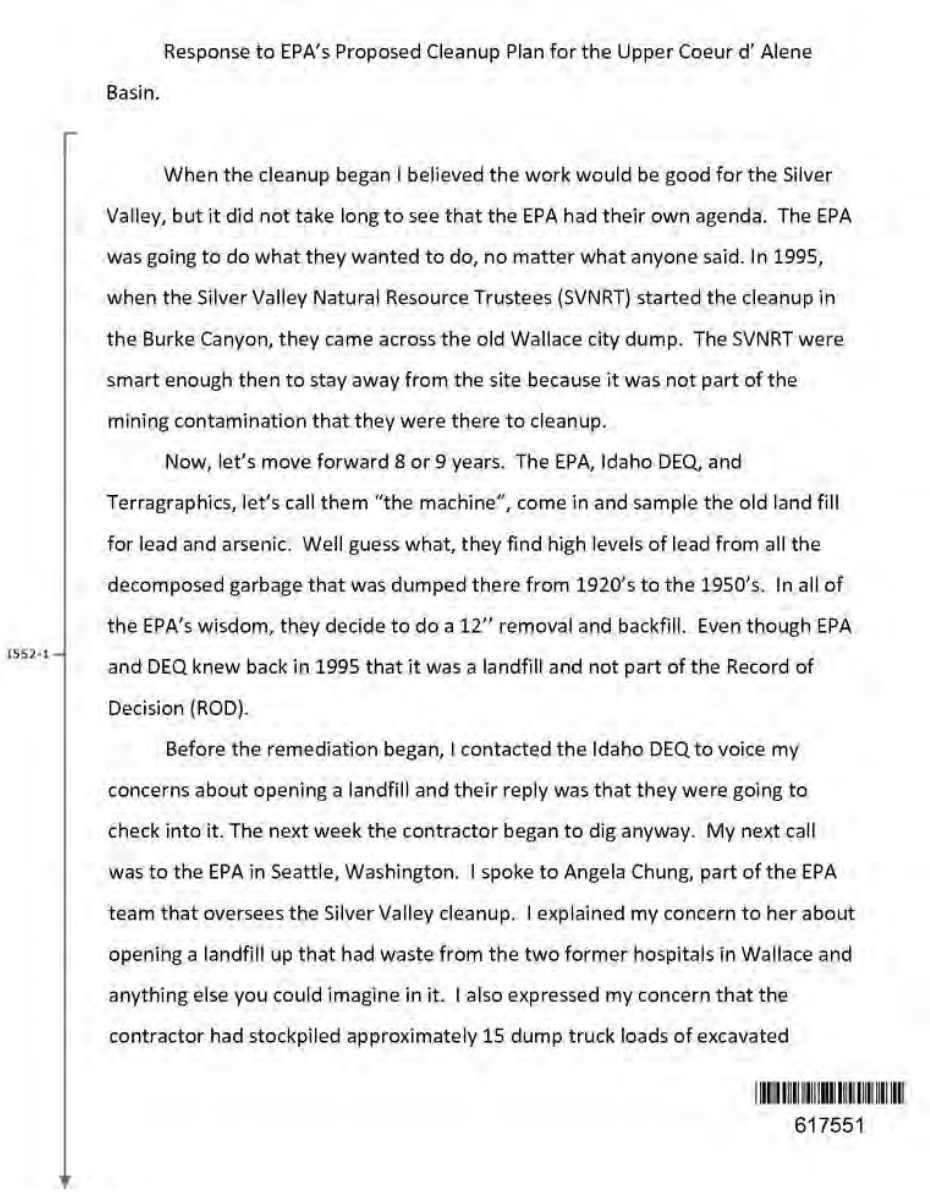
I535-1

617277

Response to comment I535-1

See response to Comment No. I351-1.

Beehner, Matt, I552, Letter 617551



Response to EPA's Proposed Cleanup Plan for the Upper Coeur d' Alene Basin.

When the cleanup began I believed the work would be good for the Silver Valley, but it did not take long to see that the EPA had their own agenda. The EPA was going to do what they wanted to do, no matter what anyone said. In 1995, when the Silver Valley Natural Resource Trustees (SVNRT) started the cleanup in the Burke Canyon, they came across the old Wallace city dump. The SVNRT were smart enough then to stay away from the site because it was not part of the mining contamination that they were there to cleanup.

Now, let's move forward 8 or 9 years. The EPA, Idaho DEQ, and Terragraphics, let's call them "the machine", come in and sample the old land fill for lead and arsenic. Well guess what, they find high levels of lead from all the decomposed garbage that was dumped there from 1920's to the 1950's. In all of the EPA's wisdom, they decide to do a 12'' removal and backfill. Even though EPA and DEQ knew back in 1995 that it was a landfill and not part of the Record of Decision (ROD).

I552-1

Before the remediation began, I contacted the Idaho DEQ to voice my concerns about opening a landfill and their reply was that they were going to check into it. The next week the contractor began to dig anyway. My next call was to the EPA in Seattle, Washington. I spoke to Angela Chung, part of the EPA team that oversees the Silver Valley cleanup. I explained my concern to her about opening a landfill up that had waste from the two former hospitals in Wallace and anything else you could imagine in it. I also expressed my concern that the contractor had stockpiled approximately 15 dump truck loads of excavated

617551

Response to comment I552-1

The comment appears to discuss issues related to a community landfill located near the mouth of Canyon Creek. Community wastes disposed of in the landfill were commingled with mining wastes that contain heavy metals like lead and zinc. This area continues to be a source of metals contamination and the Selected Remedy identifies cleanup actions for the this area. It should be noted that the community landfill is not a repository that was developed as part of clean up actions to address mine waste contamination. Repositories that EPA develops as part of the Selected Remedy shall only accept wastes generated during the performance of an EPA selected response action. Repositories used by the Institutional Control Program will only accept contaminated materials generated during cleanup or pursuant to an ICP regulated activity.

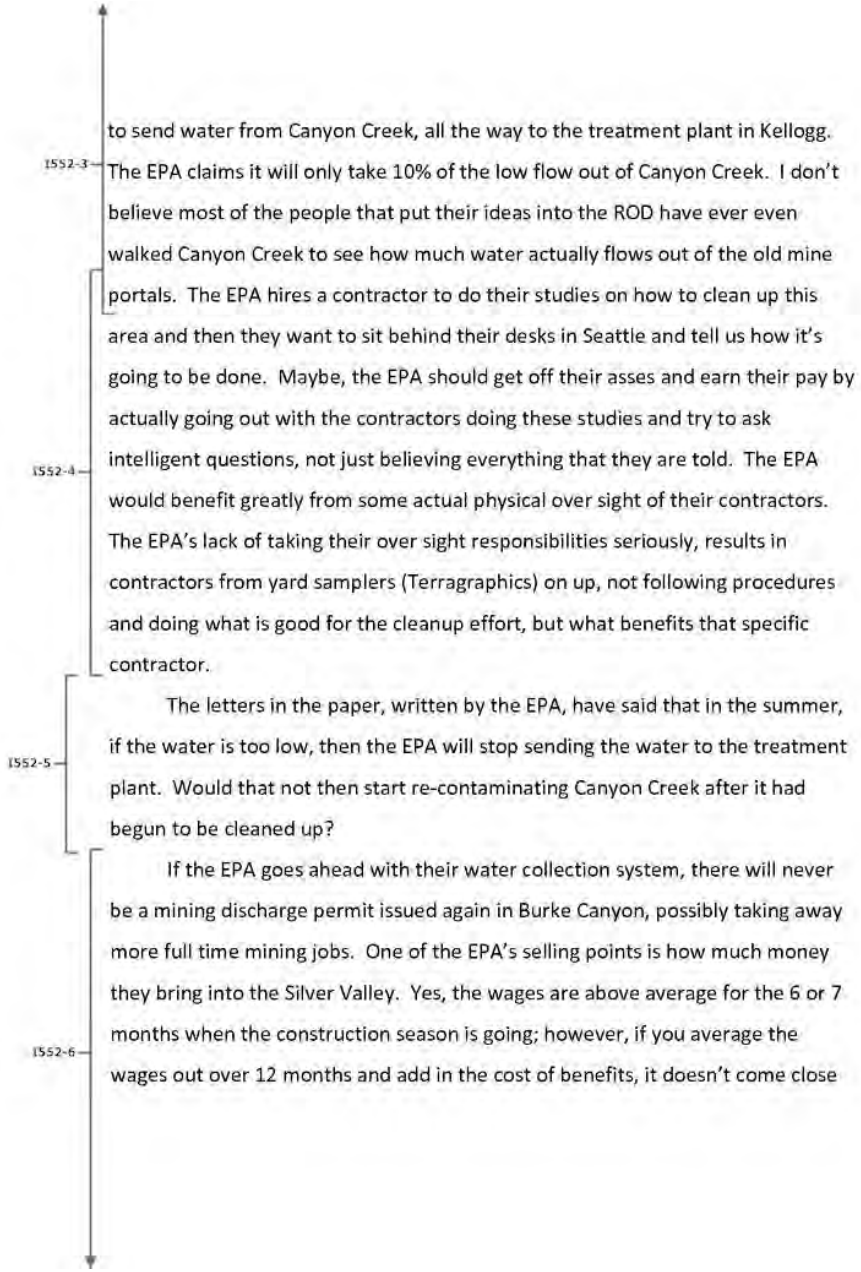
material over the weekend, which the ROD said would not be done. Angela Chung explained that she would check into it. Later, a representative of the Idaho DEQ, Mark Stromberg, did contact me. Mr. Stromberg explained to me that he had just started running the Kellogg office and that the landfill should not have been opened. He assured me that they would close it as fast as they could. I informed him that I had contacted his office before the excavation began and told them it was an old landfill but they opened it anyway. Mr. Stromberg told me that he would check into why my concern had not been looked into prior to the start of the excavation. He also told me that the rest of the landfill that had not been excavated, approximately 10 to 15 acres, would not be opened up. The EPA team leader, Angela Chung's response was that it was not of real concern to her that it was a landfill and that the ROD had not been followed. I552-1

Let's move ahead to 2008, 4 more years and incompetence is still breeding incompetence. The CDA Basin Yard Remediation is again at the landfill on Canyon Creek. They partially open the remaining part of the land fill, that I was told by Mr. Stromberg would not be touched, and cap the rest with 12'' of clean material. This "remedy" isn't even up to the EPA's own standards for capping a landfill. Again the EPA and the Idaho DEQ machine can do what they want. "The machine" can put medical and general landfill waste in repositories designed for mining waste. This brings up the question - Are the repositories in the Silver Valley now garbage landfills that will have different regulations? If any other contractor, group, or organization did this, they would be hung by the EPA. But the EPA machine cannot be stopped or even slowed down.

The new ROD is a joke just like the last one. Without any checks and balances in place, the ROD is not followed, so what's the point? The new plan is I552-2 I552-3

Response to comment I552-2
Comment noted.

Response to comment I552-3
See response to Comment No. I54-8.



to send water from Canyon Creek, all the way to the treatment plant in Kellogg.

I552-3 The EPA claims it will only take 10% of the low flow out of Canyon Creek. I don't believe most of the people that put their ideas into the ROD have ever even walked Canyon Creek to see how much water actually flows out of the old mine portals. The EPA hires a contractor to do their studies on how to clean up this area and then they want to sit behind their desks in Seattle and tell us how it's going to be done. Maybe, the EPA should get off their asses and earn their pay by actually going out with the contractors doing these studies and try to ask intelligent questions, not just believing everything that they are told. The EPA

I552-4 would benefit greatly from some actual physical over sight of their contractors. The EPA's lack of taking their over sight responsibilities seriously, results in contractors from yard samplers (Terragraphics) on up, not following procedures and doing what is good for the cleanup effort, but what benefits that specific contractor.

The letters in the paper, written by the EPA, have said that in the summer,

I552-5 if the water is too low, then the EPA will stop sending the water to the treatment plant. Would that not then start re-contaminating Canyon Creek after it had begun to be cleaned up?

If the EPA goes ahead with their water collection system, there will never be a mining discharge permit issued again in Burke Canyon, possibly taking away more full time mining jobs. One of the EPA's selling points is how much money they bring into the Silver Valley. Yes, the wages are above average for the 6 or 7

I552-6 months when the construction season is going; however, if you average the wages out over 12 months and add in the cost of benefits, it doesn't come close

Response to comment I552-4

Comment noted.

Response to comment I552-5

Based on modeling conducted by EPA (see response to Comment No. I54-8), it does not appear likely that the groundwater collection systems would need to be turned off to prevent detrimental effects to the streams with the possible exception of extreme low flow events (which occur for short periods of time at frequencies more than 10 years apart). EPA will further evaluate potential environmental impacts as well as collection system effectiveness during design.

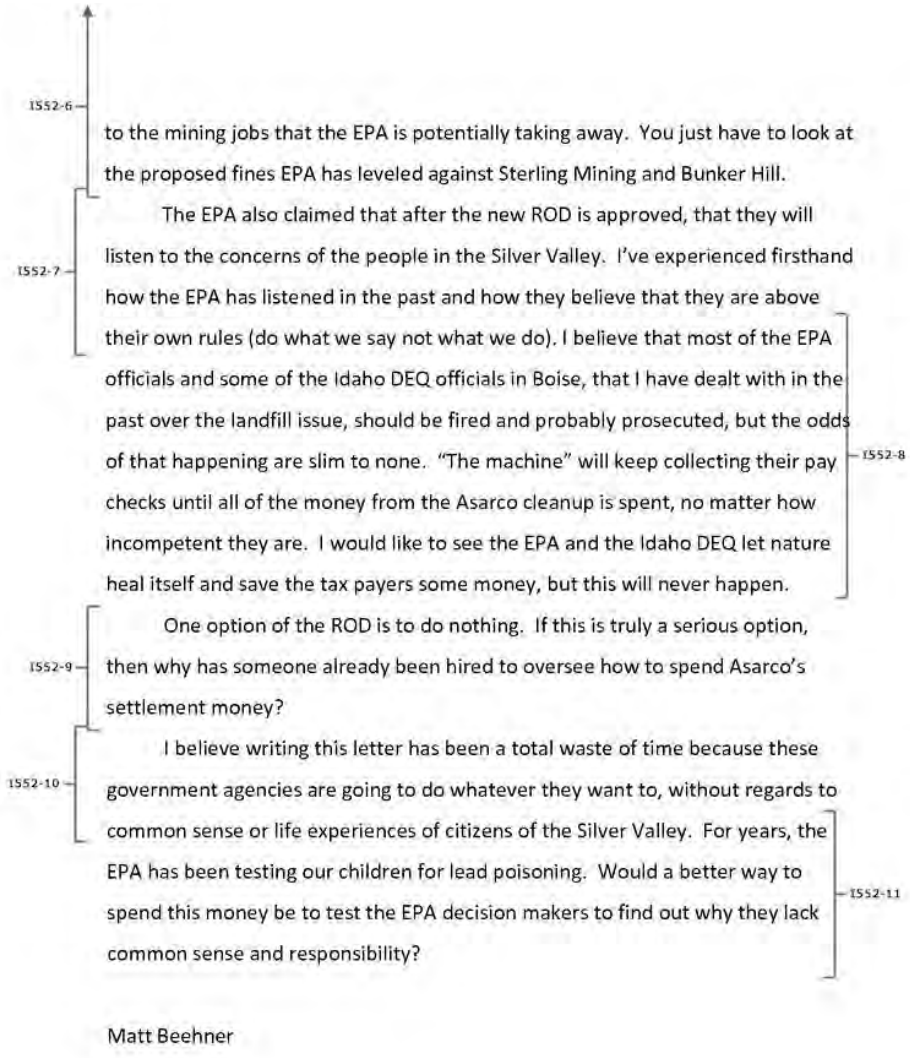
Response to comment I552-6

EPA does not believe that the collection and treatment of contaminated groundwater will result in a mining company never receiving a Clean Water Act (CWA) discharge permit in Burke Canyon. Whether a mining company obtains a CWA discharge permit will depend on information developed at the time of the permit application. Reduced river flows resulting from the collection, conveyance, and treatment of contaminated adit discharges may change the analysis underlying the permit application but will not make it impossible for a mining company to obtain a CWA discharge permit. The Selected Remedy includes actions to collect and actively treat adit drainages from adits upstream of Burke Canyon. Contaminated waters collected from these adits will be conveyed to the Central Treatment Plant for treatment. These adits contribute relatively low flows to Canyon Creek but the collection of these contaminated adits discharges and conveyance for treatment at the Central Treatment Plant will reduce river flows in Canyon Creek in Burke Canyon. This stretch of Canyon Creek is identified as impaired by certain pollutants pursuant to the CWA. There is no Total Maximum Daily Load (TMDL) for such pollutants that applies to Canyon Creek. As such, effluent limits for these pollutants are based on meeting the applicable water quality criteria prior to discharge to the water (i.e., end-of-pipe) and discharges of these pollutants do not receive the benefit of a mixing zone. If a TMDL is developed for the South Fork of the Coeur d'Alene River and its tributaries, the TMDL will allocate pollutant loads for point and non-point sources within the South Fork and its tributaries. The allocations will provide the

basis for permitted effluent limitations. Effluent limitations based on the TMDL load allocations will not get the benefit of a mixing zone either. Pollutants present in the discharge but not identified as impaired, so not included in a

TMDL, will be subject to analyses to determine whether effluent limitations are necessary. This analysis will occur when the permit application is submitted. Discharges for these permits may receive the benefit of a mixing zone. It should be noted that reductions of river flow as a result of remedy implementation may also correspond with reduction in surface water loading from non-impaired pollutants. Nevertheless, reduction in lower flows in the receiving stream may impact the amount of mixing zone available to meet these effluent limits for these pollutants and application of mixing zone to discharge permits will be dependent upon information developed at the time the permit is applied for and evaluated.

See response to Comment No. I58-5 regarding EPA's plans to conduct cleanup activities alongside continued mining operations. See response to Comment No. LC32-2 regarding jobs created as part of implementing the Selected Remedy.



I552-6

to the mining jobs that the EPA is potentially taking away. You just have to look at the proposed fines EPA has leveled against Sterling Mining and Bunker Hill.

The EPA also claimed that after the new ROD is approved, that they will

I552-7

listen to the concerns of the people in the Silver Valley. I've experienced firsthand how the EPA has listened in the past and how they believe that they are above their own rules (do what we say not what we do). I believe that most of the EPA officials and some of the Idaho DEQ officials in Boise, that I have dealt with in the past over the landfill issue, should be fired and probably prosecuted, but the odds of that happening are slim to none. "The machine" will keep collecting their pay checks until all of the money from the Asarco cleanup is spent, no matter how incompetent they are. I would like to see the EPA and the Idaho DEQ let nature heal itself and save the tax payers some money, but this will never happen.

I552-8

One option of the ROD is to do nothing. If this is truly a serious option,

I552-9

then why has someone already been hired to oversee how to spend Asarco's settlement money?

I believe writing this letter has been a total waste of time because these

I552-10

government agencies are going to do whatever they want to, without regards to common sense or life experiences of citizens of the Silver Valley. For years, the EPA has been testing our children for lead poisoning. Would a better way to spend this money be to test the EPA decision makers to find out why they lack common sense and responsibility?

I552-11

Matt Beehner

Response to comment I552-7

See responses to Comment Nos. I295-2 and LJ11-2.

Response to comment I552-8

Comment noted.

Response to comment I552-9

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. The No Action Alternative is required to be evaluated under CERCLA. As described in the ROD Amendment, it was rejected as not compliant with the threshold criteria (Overall protections of human health and the environment, and Compliance with ARARs). Regarding the funding of the cleanup, see response to Comment No. I295-3.

Response to comment I552-10

See response to Comment No. I295-2.

Response to comment I552-11

Comment noted.

Beliveau, David, I536, Letter 617278

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
dave.beliveau@itron.com to: formsubmission 11/19/2010 01:41 PM
Sent by: Dave.Beliveau@Itron.Com <dave.beliveau=itron.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: David Beliveau
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I536-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I536-2 I thnk that you (the EPA) have done enough damage in the area, It feels like to me that the "people" who are pushing this have moved here, love it here and don't want to leave. So you're trying to figure out how you can keep your job and keep this gravey train going. I emplore your higher management that may read these letters to spend our hard earned Tax Money else where. Where the locals really "need and want your help". I think that you need to take us off your list.
Coeur d'Alene Basin Resident: Yes
Email Address: dave.beliveau@itron.com
Mailing Address: 12611 N. Chicken Pt Rd.|Hayden|Idaho|83835|US
Phone Number: (208) 772-5509

617278

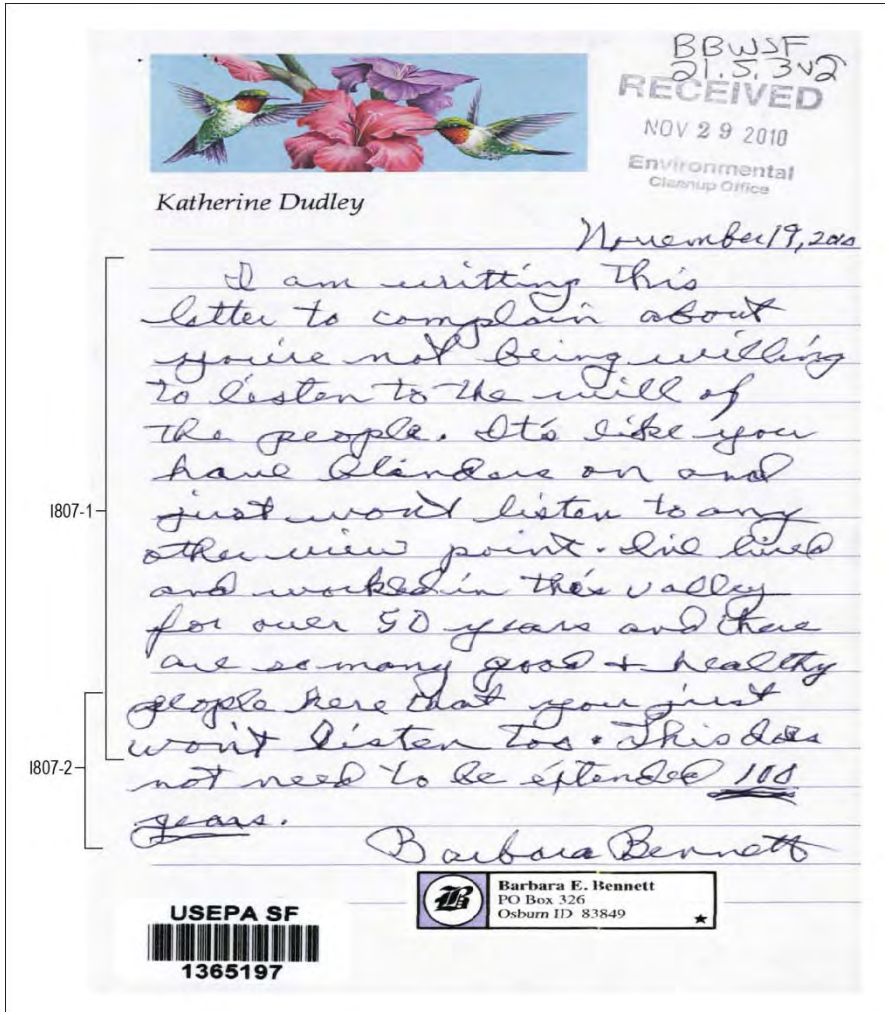
Response to comment I536-1

See response to Comment No. I351-1.

Response to comment I536-2

Comment noted.

Bennett, Barbara, I807, Letter 1365197



BBWSF
21.5.3v2
RECEIVED
NOV 29 2010
Environmental
Cleanup Office

Katherine Dudley

November 19, 2010

I807-1 I am writting this letter to complain about youre not being willing to listen to the will of the people. Its like you have blinders on and just wont listen to any other view point. I've lived and worked in this valley for over 50 years and there are so many good + healthy people here that you just wont listen too. This does

I807-2 not need to be extended 10 years.

Barbara Bennett

Barbara E. Bennett
PO Box 326
Osburn ID 83849

USEPA SF
1365197

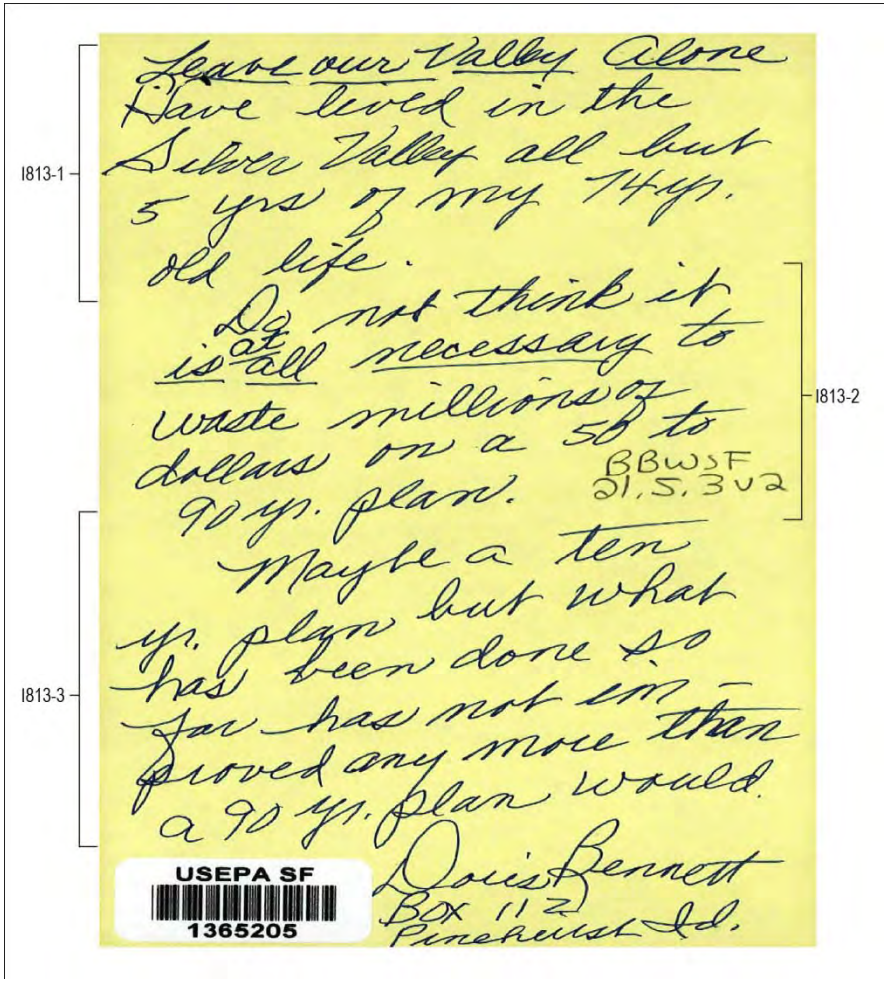
Response to comment I807-1

See response to Comment No. I295-2.

Response to comment I807-2

See response to Comment No. I58-1.

Bennett, Davis, I813, Letter 1365205



Response to comment I813-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

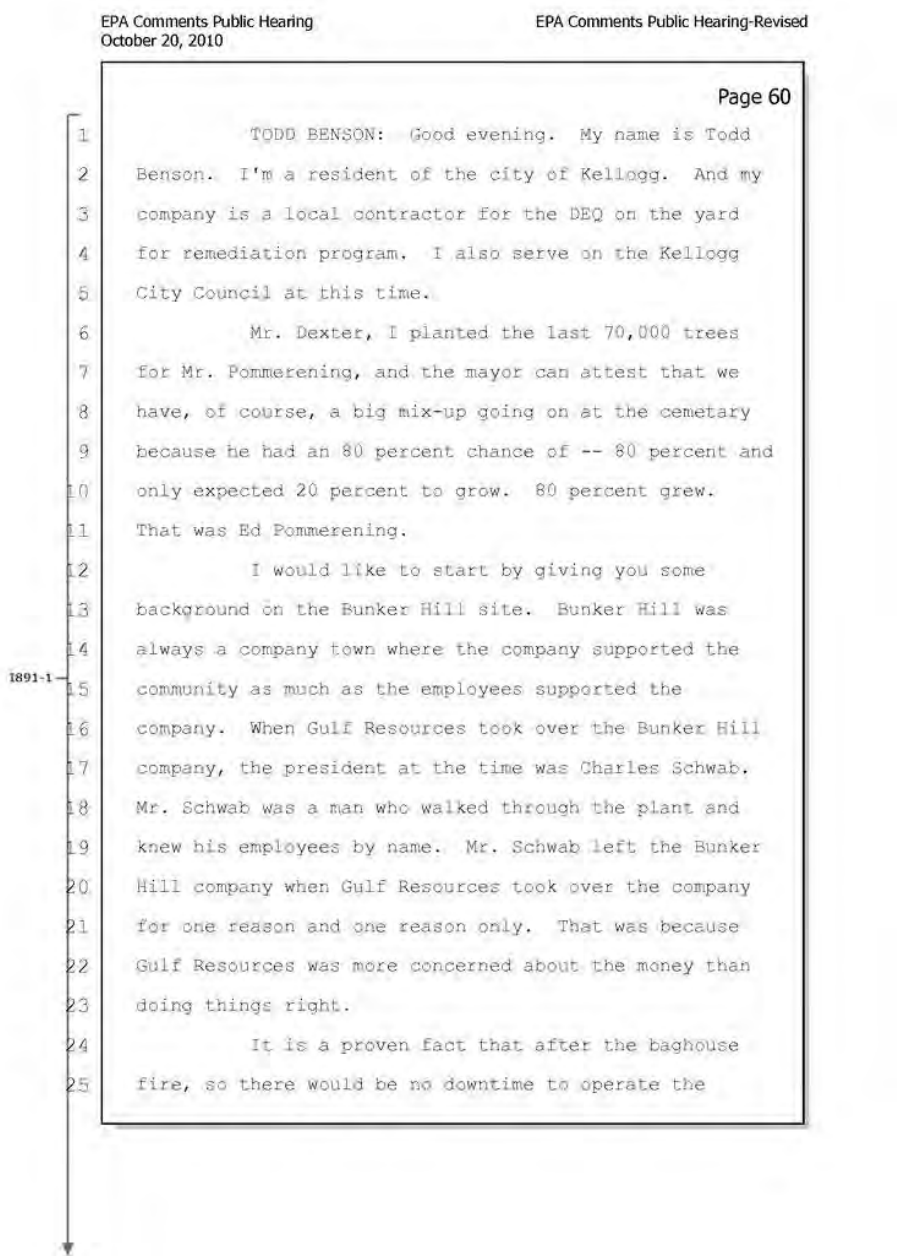
Response to comment I813-2

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I813-3

Comment noted.

Benson, Todd, I891, Letter 619651-24



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TODD BENSON: Good evening. My name is Todd Benson. I'm a resident of the city of Kellogg. And my company is a local contractor for the DEQ on the yard for remediation program. I also serve on the Kellogg City Council at this time.

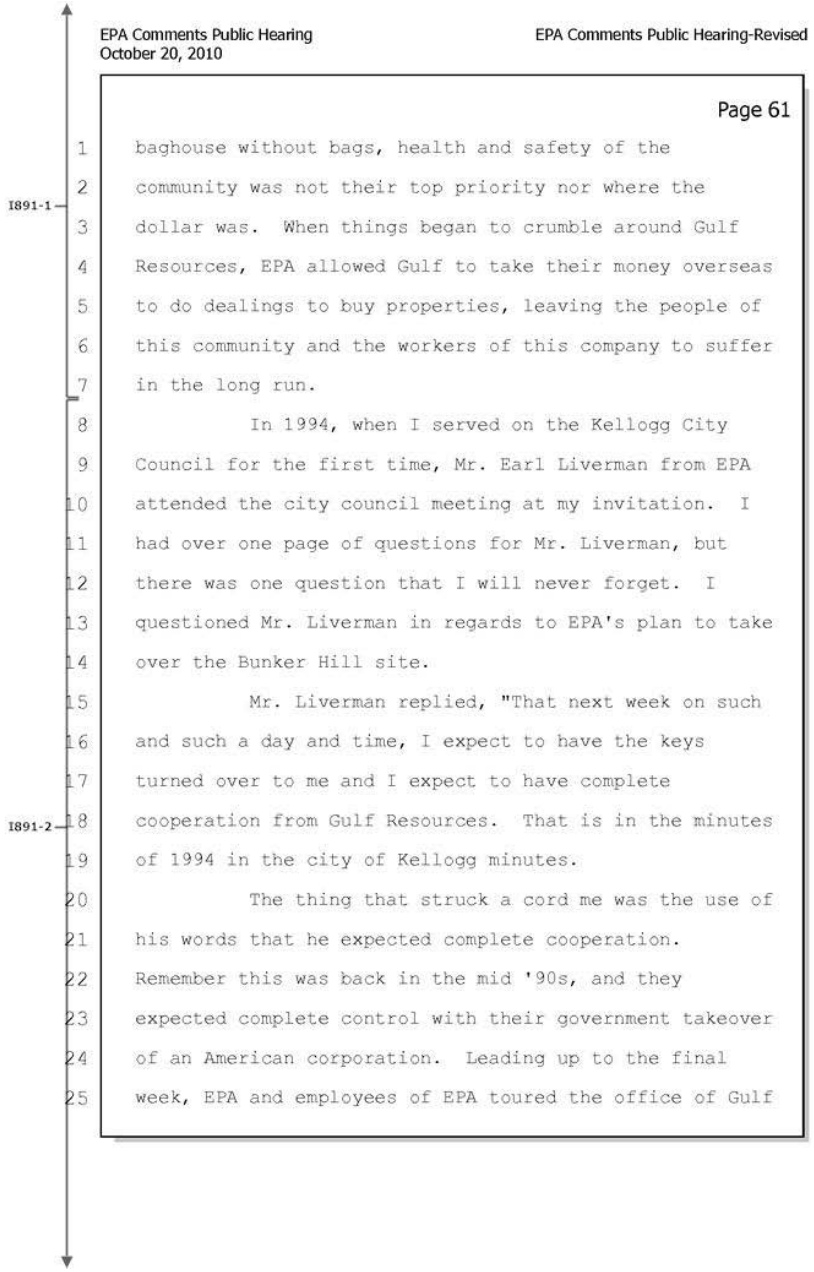
Mr. Dexter, I planted the last 70,000 trees for Mr. Pommerening, and the mayor can attest that we have, of course, a big mix-up going on at the cemetary because he had an 80 percent chance of -- 80 percent and only expected 20 percent to grow. 80 percent grew. That was Ed Pommerening.

I would like to start by giving you some background on the Bunker Hill site. Bunker Hill was always a company town where the company supported the I891-1 community as much as the employees supported the company. When Gulf Resources took over the Bunker Hill company, the president at the time was Charles Schwab. Mr. Schwab was a man who walked through the plant and knew his employees by name. Mr. Schwab left the Bunker Hill company when Gulf Resources took over the company for one reason and one reason only. That was because Gulf Resources was more concerned about the money than doing things right.

It is a proven fact that after the baghouse fire, so there would be no downtime to operate the

Response to comment I891-1

Comment noted. However, EPA neither sought nor benefited from the demise of Gulf Resources. Gulf's demise resulted in an enormous cleanup cost being passed to the taxpayers of the United States. EPA, as a result of its obligations and responsibilities under CERCLA, had to assume the lead cleanup role for administering that cleanup.



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baghouse without bags, health and safety of the community was not their top priority nor where the dollar was. When things began to crumble around Gulf Resources, EPA allowed Gulf to take their money overseas to do dealings to buy properties, leaving the people of this community and the workers of this company to suffer in the long run.

I891-1

In 1994, when I served on the Kellogg City Council for the first time, Mr. Earl Liverman from EPA attended the city council meeting at my invitation. I had over one page of questions for Mr. Liverman, but there was one question that I will never forget. I questioned Mr. Liverman in regards to EPA's plan to take over the Bunker Hill site.

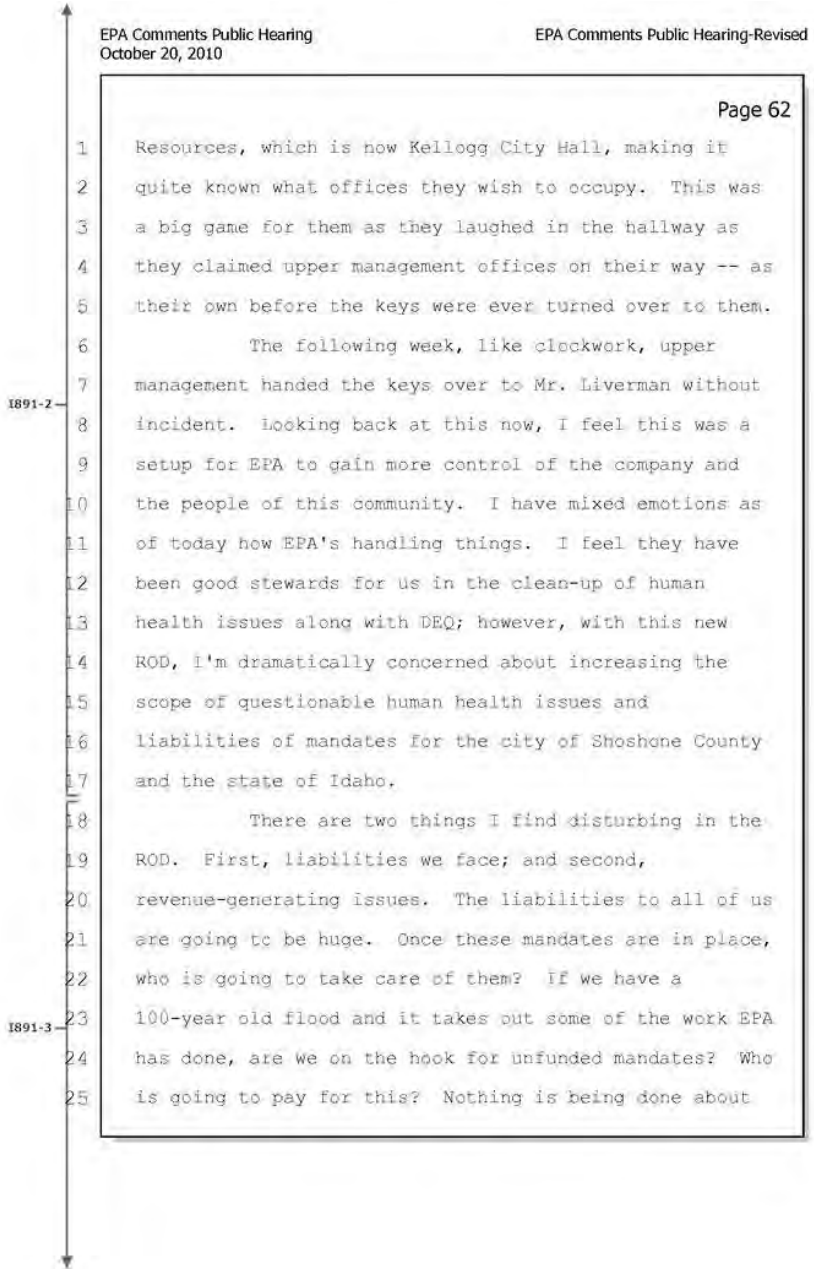
Mr. Liverman replied, "That next week on such and such a day and time, I expect to have the keys turned over to me and I expect to have complete cooperation from Gulf Resources. That is in the minutes of 1994 in the city of Kellogg minutes.

I891-2

The thing that struck a cord me was the use of his words that he expected complete cooperation. Remember this was back in the mid '90s, and they expected complete control with their government takeover of an American corporation. Leading up to the final week, EPA and employees of EPA toured the office of Gulf

Response to comment I891-2

EPA neither sought nor benefited from the demise of Gulf Resources.



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Resources, which is now Kellogg City Hall, making it quite known what offices they wish to occupy. This was a big game for them as they laughed in the hallway as they claimed upper management offices on their way -- as their own before the keys were ever turned over to them.

The following week, like clockwork, upper management handed the keys over to Mr. Liverman without incident. Looking back at this now, I feel this was a setup for EPA to gain more control of the company and the people of this community. I have mixed emotions as of today how EPA's handling things. I feel they have been good stewards for us in the clean-up of human health issues along with DEQ; however, with this new ROD, I'm dramatically concerned about increasing the scope of questionable human health issues and liabilities of mandates for the city of Shoshone County and the state of Idaho.

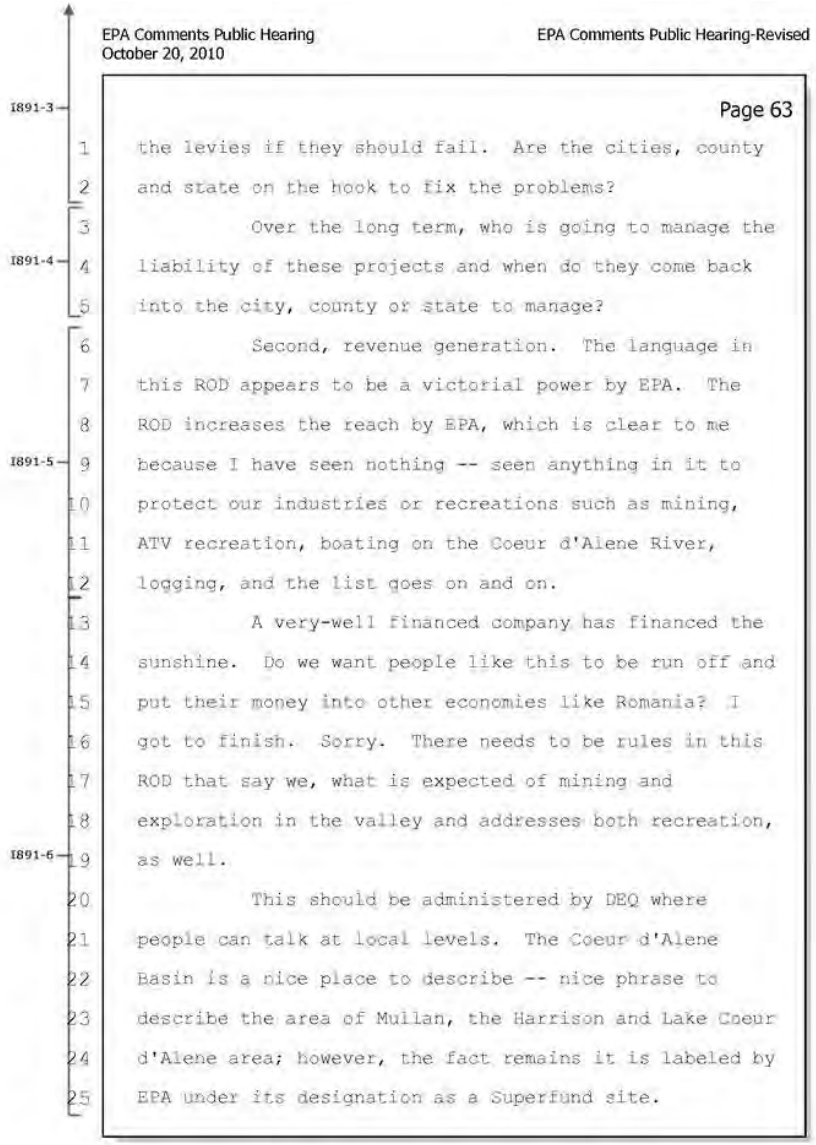
I891-2

There are two things I find disturbing in the ROD. First, liabilities we face; and second, revenue-generating issues. The liabilities to all of us are going to be huge. Once these mandates are in place, who is going to take care of them? If we have a 100-year old flood and it takes out some of the work EPA has done, are we on the hook for unfunded mandates? Who is going to pay for this? Nothing is being done about

I891-3

Response to comment I891-3

See response to Comment No. LJ36-3. If a flood event damages a constructed remedy such that remedial action and O&M performance standards may no longer be met, EPA and the State will evaluate how and why the event occurred, and will determine whether the damage requires repair and whether such repair is a remedial action or part of O&M. This determination will be based on many factors including the severity of the event, the severity of damage, and risk posed by the damage. Depending upon extent of damage other state and federal agencies may be involved in addressing the damage.



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I891-3

the levies if they should fail. Are the cities, county and state on the hook to fix the problems?

Over the long term, who is going to manage the

I891-4

liability of these projects and when do they come back into the city, county or state to manage?

Second, revenue generation. The language in this ROD appears to be a victorial power by EPA. The ROD increases the reach by EPA, which is clear to me

I891-5

because I have seen nothing -- seen anything in it to protect our industries or recreations such as mining, ATV recreation, boating on the Coeur d'Alene River, logging, and the list goes on and on.

A very-well financed company has financed the sunshine. Do we want people like this to be run off and put their money into other economies like Romania? I got to finish. Sorry. There needs to be rules in this ROD that say we, what is expected of mining and exploration in the valley and addresses both recreation,

I891-6

as well.

This should be administered by DEQ where people can talk at local levels. The Coeur d'Alene Basin is a nice place to describe -- nice phrase to describe the area of Mullan, the Harrison and Lake Coeur d'Alene area; however, the fact remains it is labeled by EPA under its designation as a Superfund site.

Response to comment I891-4

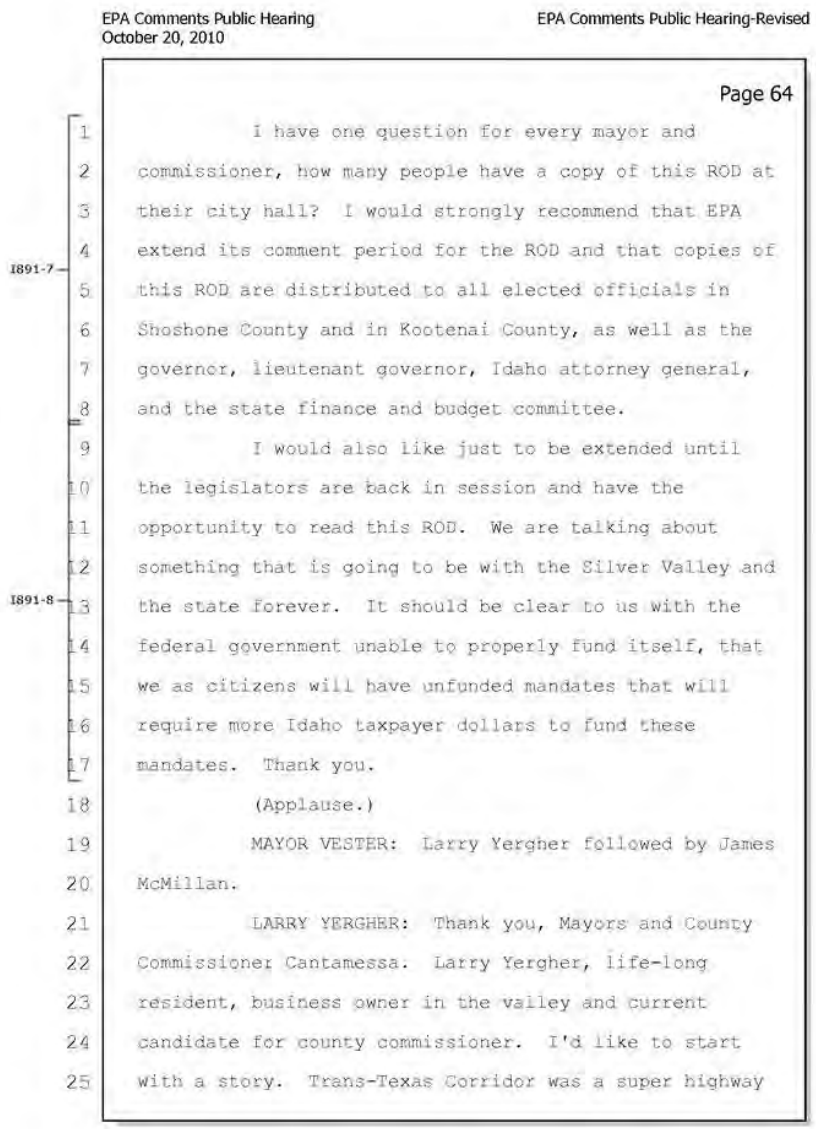
The capital and Operation and Maintenance costing of the Selected Remedy is described in Part 2, Sections 12.1.3 and 12.2.3 of the ROD Amendment. Regarding the funding of the Selected Remedy see response to Comment No. I295-3.

Response to comment I891-5

See responses to Comment Nos. I54-2 and I58-5.

Response to comment I891-6

See response to Comment No. I58-5.



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I891-7 I891-8

I have one question for every mayor and commissioner, how many people have a copy of this ROD at their city hall? I would strongly recommend that EPA extend its comment period for the ROD and that copies of this ROD are distributed to all elected officials in Shoshone County and in Kootenai County, as well as the governor, lieutenant governor, Idaho attorney general, and the state finance and budget committee.

I would also like just to be extended until the legislators are back in session and have the opportunity to read this ROD. We are talking about something that is going to be with the Silver Valley and the state forever. It should be clear to us with the federal government unable to properly fund itself, that we as citizens will have unfunded mandates that will require more Idaho taxpayer dollars to fund these mandates. Thank you.

(Applause.)

MAYOR VESTER: Larry Yergher followed by James McMillan.

LARRY YERGHER: Thank you, Mayors and County Commissioner Cantamessa. Larry Yergher, life-long resident, business owner in the valley and current candidate for county commissioner. I'd like to start with a story. Trans-Texas Corridor was a super highway

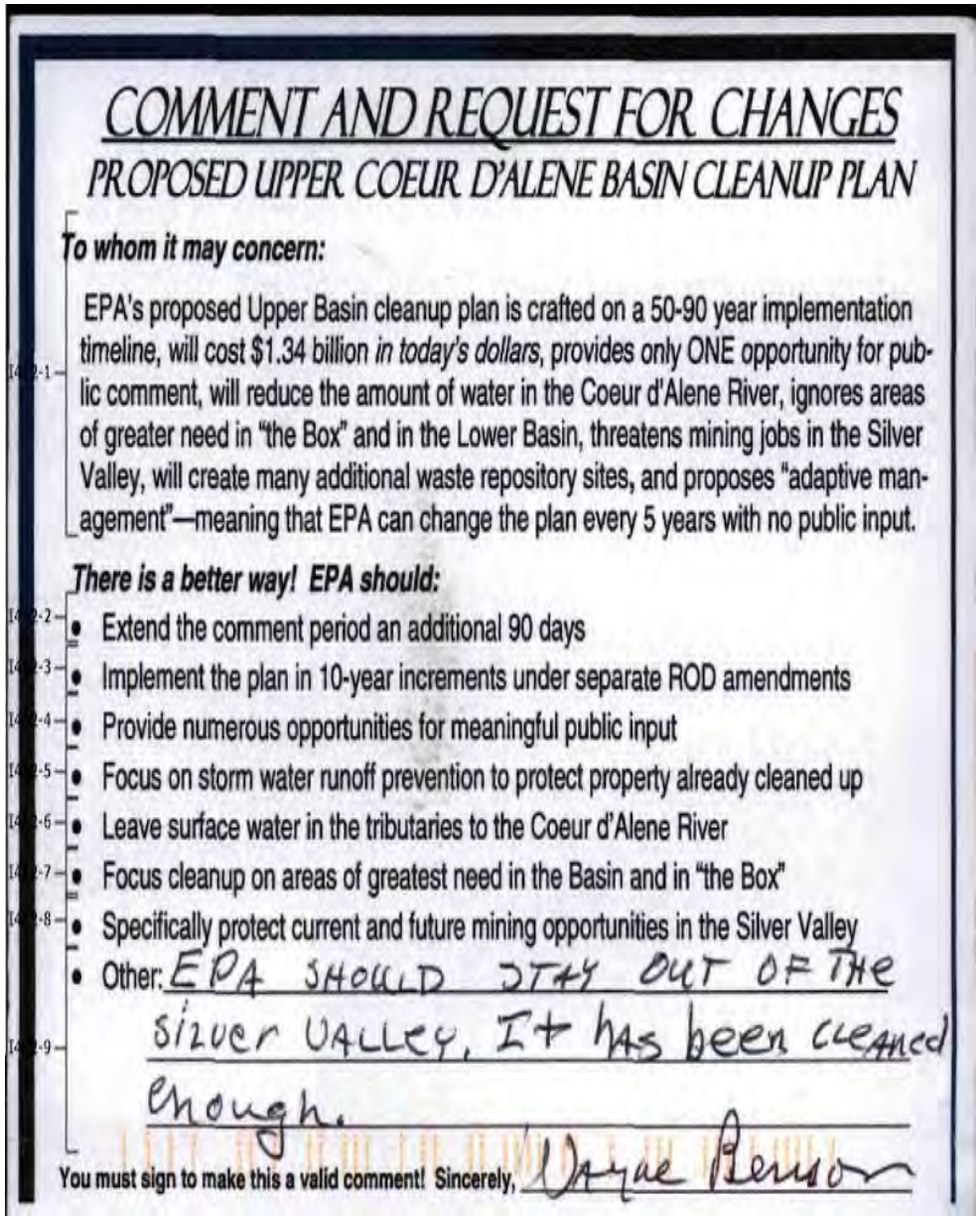
Response to comment I891-7

See responses to Comment Nos. I54-6 and I295-2.

Response to comment I891-8

See responses to Comment Nos. I54-6 and I295-3 and I58-2.

Benson, Wayne, I452, Letter 1308494



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I452-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I452-2 Extend the comment period an additional 90 days
- I452-3 Implement the plan in 10-year increments under separate ROD amendments
- I452-4 Provide numerous opportunities for meaningful public input
- I452-5 Focus on storm water runoff prevention to protect property already cleaned up
- I452-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I452-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I452-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: EPA SHOULD STAY OUT OF THE SILVER VALLEY. IT HAS BEEN CLEANED ENOUGH. I452-9

You must sign to make this a valid comment! Sincerely, Wayne Benson

Response to comment I452-1
See response to Comment No. I25-1.

Response to comment I452-2
See response to Comment No. I25-2.

Response to comment I452-3
See response to Comment No. I25-3.

Response to comment I452-4
See response to Comment No. I25-4.

Response to comment I452-5
See response to Comment No. I25-5.

Response to comment I452-6
See response to Comment No. I25-6.

Response to comment I452-7
See response to Comment No. I25-7.

Response to comment I452-8
See response to Comment No. I25-8.

Response to comment I452-9
Comment noted.

Bergstrom, Frank , I537, Letter 617279

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
frank.b@gci.net to formsubmission 11/17/2010 04:38 PM
Sent by: Frank.B@Gci.Net <frank.b=gci.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

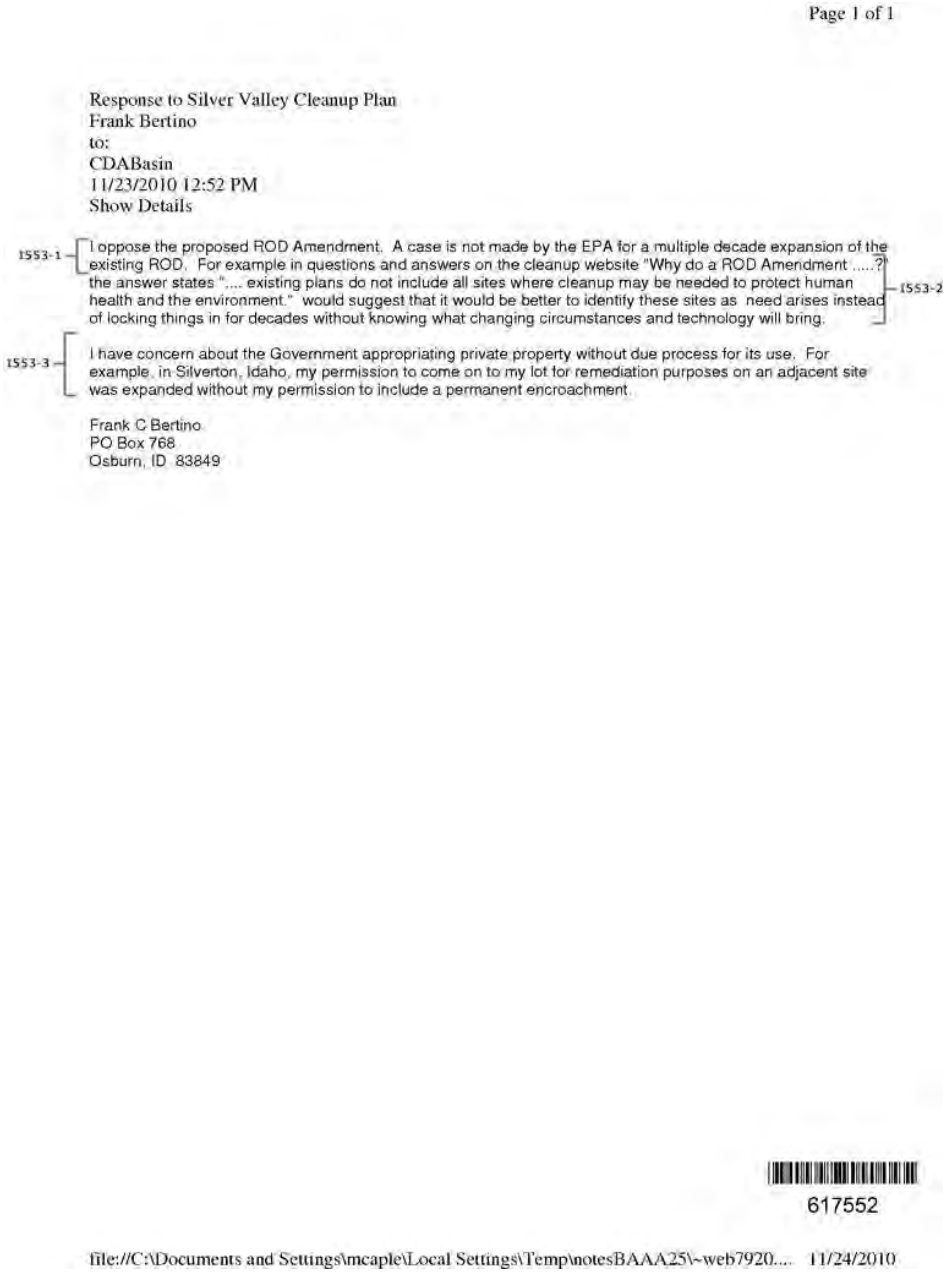
From: Frank Bergstrom
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. One of the critical issues to the future of the United States is deficit reduction. We must reduce our deficits to remain competetive. Unjustifiably high expenditures for diminishing environmental returns should be the first bit of wasteful spending to go!
I537-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows.
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. Get it done over the next decade or quit.
Coeur d'Alene Basin Resident: No
Email Address: frank.b@gci.net
Mailing Address: PO Box 22909|Juneau|Alaska|99802|US
Phone Number:

617279

Response to comment I537-1

See response to Comment No. I351-1.

Bertino, Frank , I553, Letter 617552



Page 1 of 1

Response to Silver Valley Cleanup Plan
Frank Bertino
to:
CDABasin
11/23/2010 12:52 PM
Show Details

I553-1 I oppose the proposed ROD Amendment. A case is not made by the EPA for a multiple decade expansion of the existing ROD. For example in questions and answers on the cleanup website "Why do a ROD Amendment .....?" the answer states ".... existing plans do not include all sites where cleanup may be needed to protect human health and the environment." would suggest that it would be better to identify these sites as need arises instead of locking things in for decades without knowing what changing circumstances and technology will bring. I553-2

I553-3 I have concern about the Government appropriating private property without due process for its use. For example, in Silverton, Idaho, my permission to come on to my lot for remediation purposes on an adjacent site was expanded without my permission to include a permanent encroachment.

Frank C Bertino
PO Box 768
Osburn, ID 83849

617552

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web7920.... 11/24/2010

Response to comment I553-1

Comment noted. See response to Comment No. I58-1.

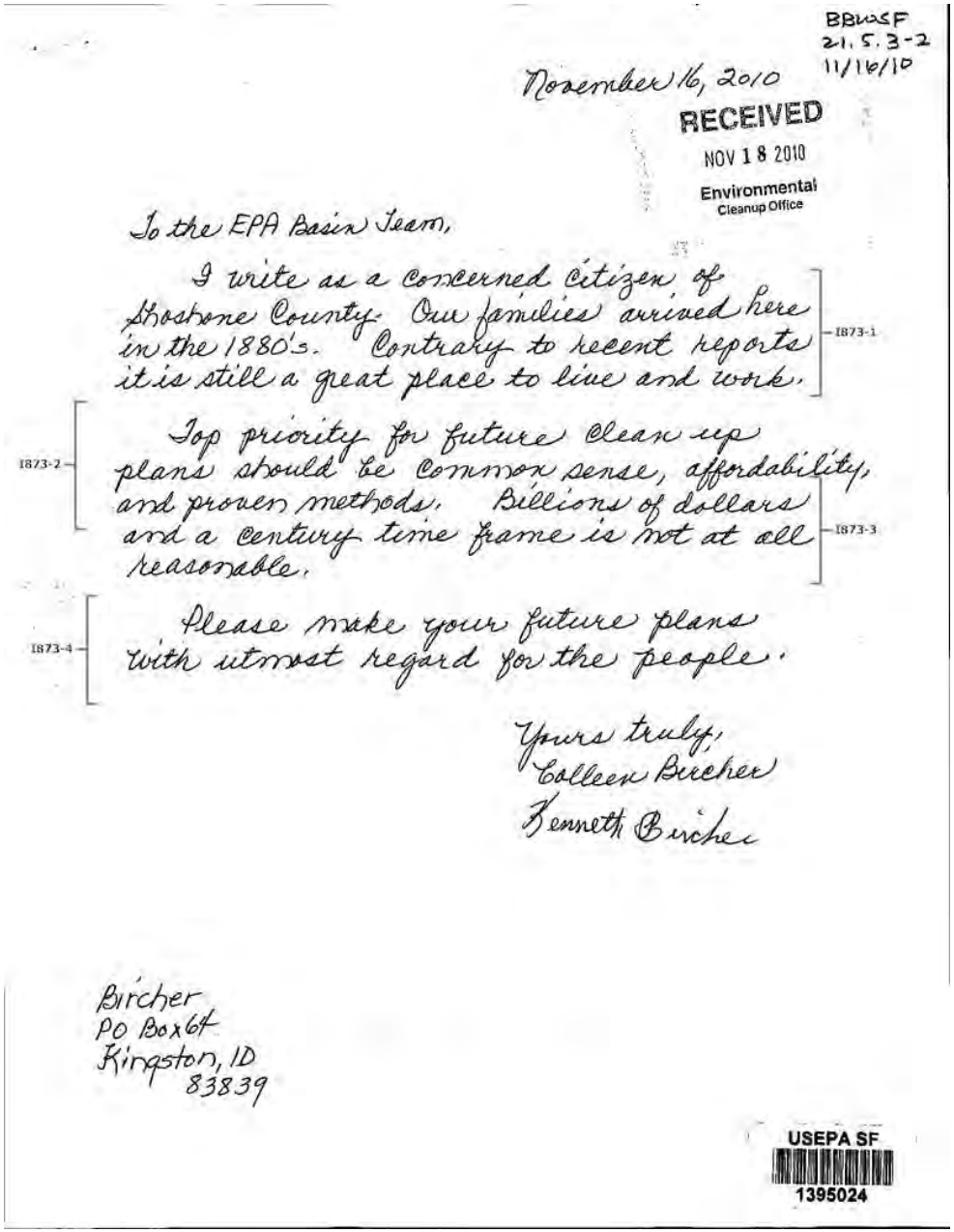
Response to comment I553-2

As described in the response to Comment No. I58-1, EPA has decided to significantly reduce the scope of the cleanup included in the Selected Remedy. As the cleanup is implemented, EPA will use an adaptive management process as described in the ROD Amendment Part 2, Section 12.3.

Response to comment I553-3

The federal government may not take private property without paying compensation. A property owner who believes that his or her property has been taken without the payment of compensation may assert a takings claim against the United States.

Bircher, Colleen and Kenneth, I873, Letter 1395024



BBWSF
21.5.3-2
11/16/10

November 16, 2010

RECEIVED
NOV 18 2010
Environmental
Cleanup Office

To the EPA Basin Team,

I write as a concerned citizen of Shoshone County. Our families arrived here in the 1880's. Contrary to recent reports it is still a great place to live and work. I873-1

I873-2 Top priority for future clean up plans should be common sense, affordability, and proven methods. Billions of dollars and a century time frame is not at all reasonable. I873-3

I873-4 Please make your future plans with utmost regard for the people.

Yours truly,
Colleen Bircher
Kenneth Bircher

Bircher
PO Box 64
Kingston, ID
83839

USEPA SF
1395024

Response to comment I873-1
Thank you for your comment.

Response to comment I873-2
See responses to Comment Nos. I58-1 and I58-4.

Response to comment I873-3
See responses to Comments Nos. I58-1 and I58-2.

Response to comment I873-4
See response to Comment Nos. I295-1 and I295-2.

Bircher, Colleen, I460, Letter 1308797

BBWSF
21,5,3
10/28/10

Shoshone County

RECEIVED
OCT 28 2010
Environmental Cleanup Office

Editorial

By Dick Harwood, Idaho State Representative

Disingenuous. That's the only word to adequately describe the Environmental Protection Agency's (EPA) recent media-heavy attempts to paint themselves and their $1.3 billion, 50-90 year plan to expand cleanup in the Upper Coeur d'Alene Basin, in a favorable light to the people of North Idaho.

EPA released a Record of Decision (ROD) in 2002 to remediate historic mine waste in the Silver Valley. This ROD was a 30-year plan intended to address human health protection in Shoshone County. Despite the fact that blood-lead levels are now within acceptable limits, the EPA is proposing to expand cleanup efforts to address ecological issues already underway in the Valley.

I460-1

Silver Valley residents are hopping mad, and rightfully so. Consider some of the elements of the proposed plan — 10 miles of plastic liner installed under the South Fork of the Coeur d'Alene River, removal of 12,000 to 19,000 gallons of groundwater per minute from the upper headwaters of the South Fork, construction of 59 miles of pipeline to move collected groundwater to the Central Treatment Plant, five to six new repositories each the size of East Mission Flats and enough soil to fill a 115-story building, and no assurances that the mining activities, which provide over 1 percent of Shoshone County's direct employment, will be allowed to continue.

Needless to say, public opposition to this plan is virtually unanimous. Hundreds of people showed up at public meetings in the valley last August to tell the EPA their plan is too expensive, too big and the wrong approach. Simply put, EPA has overstated the problem and the resultant cleanup plan.

EPA is undeterred, however. They have launched a media blitz which includes recurrent half-page ads in the local newspapers and media tours showcasing projects they claim their cleanup activities have had a positive impact on wildlife habitat.

There's just one problem — EPA isn't telling the whole truth. Recent stories have appeared in the local newspapers showcasing Moon Creek, a contaminated stream north of Kellogg, as an example of successful cleanup. These stories implied that the Moon Creek project was an EPA-directed cleanup. In reality, the U.S. Forest Service was responsible for that effort, not the EPA.

In another article, the EPA trumpets about a wetland improvement project near Rose Lake. This is an admirable project, but the problem is EPA suggests that this is an example of what they can accomplish in the Upper Basin. In reality, this Lower Basin project is completely different from what is being proposed for the Upper Basin. This project was a conservation easement on private property, with many agencies and volunteers involved. An EPA spokesman implied in the story that the formula they used on the project is easily exported to the Upper Basin. In reality, comparing this small project to the massive Upper Basin plan is comparing apples and oranges.

Perhaps most maddening however, are the series of ads EPA has placed in our local newspapers which attempt to help us all "understand the plan." These are nothing but desperate attempts by the agency to try and gain some level of support for a wildly unpopular and misguided plan.

Colleen Bircher
PO Box 64
Kingston, ID 83839

USEPA SF
1308797

Response to comment I460-1
Comment noted.

Bircher, Kip, I470, Letter 1308809

Shoshone County

Editorial

RECEIVED
NOV 4 – 2010
Environmental
Cleanup Office
BBWSF
21.5.3
11/04/10

By Dick Harwood, Idaho State Representative

Disingenuous. That's the only word to adequately describe the Environmental Protection Agency's (EPA) recent media-heavy attempts to paint themselves and their $1.3 billion, 50-90 year plan to expand cleanup in the Upper Coeur d'Alene Basin, in a favorable light to the people of North Idaho.

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Silver Valley residents are hopping mad, and rightfully so. Consider some of the elements of the proposed plan — 10 miles of plastic liner installed under the South Fork of the Coeur d'Alene River, removal of 12,000 to 19,000 gallons of groundwater per minute from the upper headwaters of the South Fork, construction of 59 miles of pipeline to move collected groundwater to the Central Treatment Plant, five to six new repositories each the size of East Mission Flats and enough soil to fill a 115-story building, and no assurances that the mining activities, which provide over 11 percent of Shoshone County's direct employment, will be allowed to continue.

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In another article, the EPA trumpets about a wetland improvement project near Rose Lake. This is an admirable project, but the problem is EPA suggests that this is an example of what they can accomplish in the Upper Basin. In reality, this Lower Basin project is completely different from what is being proposed for the Upper Basin. This project was a conservation easement on private property, with many agencies and volunteers involved. An EPA spokesman implied in the story that the formula they used on the project is easily exported to the Upper Basin. In reality, comparing this small project to the massive Upper Basin plan is comparing apples and oranges.

Perhaps most maddening however, are the series of ads EPA has placed in our local newspapers which attempt to help us all "understand the plan." These are nothing but desperate attempts by the agency to try and gain some level of support for a wildly unpopular and misguided plan.

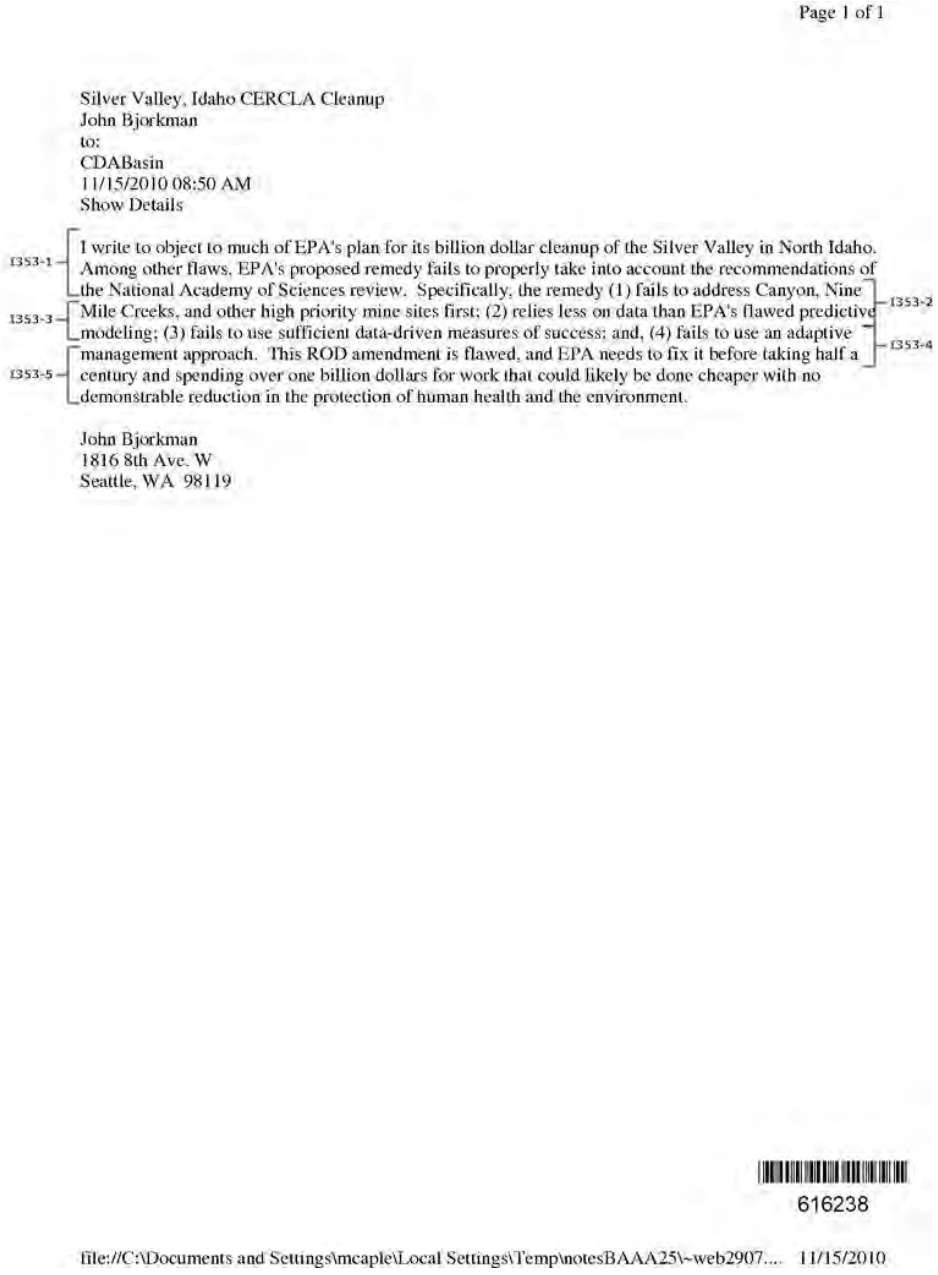
I470-1

Kip R. Bircher
Debbie Bircher

USEPA SF
1308809

Response to comment I470-1
Comment noted.

Bjorkman, John, I353, Letter 616238



Page 1 of 1

Silver Valley, Idaho CERCLA Cleanup
John Bjorkman
to:
CDABasin
11/15/2010 08:50 AM
Show Details

I353-1 I write to object to much of EPA's plan for its billion dollar cleanup of the Silver Valley in North Idaho. Among other flaws, EPA's proposed remedy fails to properly take into account the recommendations of the National Academy of Sciences review. Specifically, the remedy (1) fails to address Canyon, Nine I353-2
I353-3 Mile Creeks, and other high priority mine sites first; (2) relies less on data than EPA's flawed predictive modeling; (3) fails to use sufficient data-driven measures of success; and, (4) fails to use an adaptive I353-4
I353-5 management approach. This ROD amendment is flawed, and EPA needs to fix it before taking half a century and spending over one billion dollars for work that could likely be done cheaper with no demonstrable reduction in the protection of human health and the environment.

John Bjorkman
1816 8th Ave. W
Seattle, WA 98119

616238

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web2907.... 11/15/2010

Response to comment I353-1

See response to Comment No. LJ27-8.

Response to comment I353-2

See response to Comment No. I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. The Selected Remedy does focus the majority of actions on Canyon Creek, Ninemile Creek and the Bunker Hill Box.

Response to comment I353-3

Regarding EPA's use of the Predictive Analysis, see response to comment No. LJ27-8. Regarding "data-driven measures of success" see responses to Comment Nos. LJ39-5 and SA4-13.

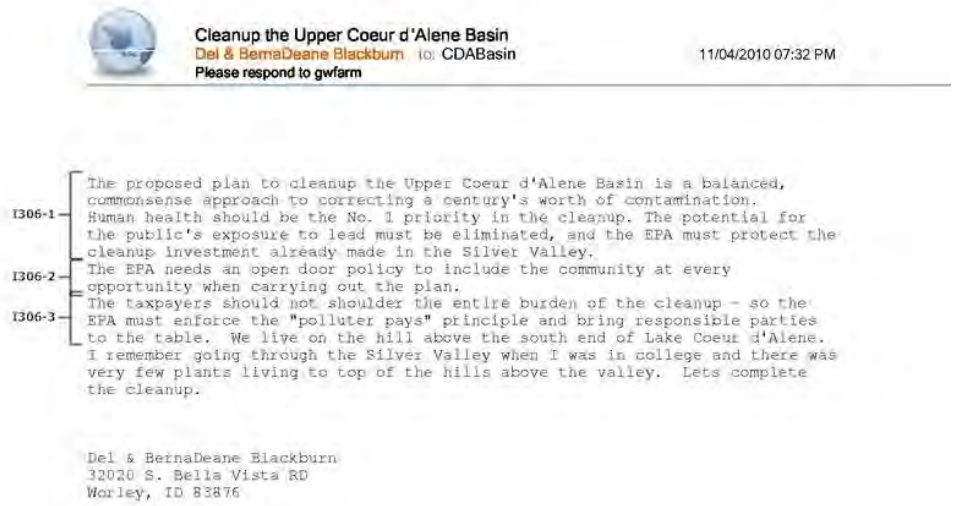
Response to comment I353-4

EPA is committed to using an adaptive management framework to manage and carry out the Selected Remedy for the Upper Basin, in accordance with its previous decision documents and the recommendations of the NAS (National Academy of Sciences, 2005, http://www.epa.gov/superfund/accomp/coeur/).

Response to comment I353-5

See responses to Comment Nos. I58-1 and I58-2.

Blackburn, Del, I306, Letter 614436



Cleanup the Upper Coeur d'Alene Basin
Del & BernaDeane Blackburn to: CDABasin 11/04/2010 07:32 PM
Please respond to gwfarm

I306-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I306-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I306-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table. We live on the hill above the south end of Lake Coeur d'Alene. I remember going through the Silver Valley when I was in college and there was very few plants living to top of the hills above the valley. Lets complete the cleanup.

Del & BernaDeane Blackburn
32020 S. Bella Vista RD
Worley, ID 83876

614436

Response to comment I306-1

See response to Comment No. I295-1.

Response to comment I306-2

See response to Comment No. I295-2.

Response to comment I306-3

See response to Comment No. I295-3.

Blair, Frank, I538, Letter 617280

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
frank.dot@comcast.net to: formsubmission 11/17/2010 11:19 AM
Sent by: Frank.Dot@Comcast.Net <frank.dot=comcast.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Frank Blair
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: frank.dot@comcast.net
Mailing Address: 1511 S Stanley Rd|Spokane Valley|Washington|99212-3228|US
Phone Number: (509) 533-2716

I538-1

617280

Response to comment I538-1

See response to Comment No. I351-1.

Blair, Tammy, I539, Letter 617281

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
tblair@vetmed.wsu.edu to: formsubmission 11/16/2010 11:35 AM
Sent by: Tblair@Vetmed.Wsu.Edu <tblair=vetmed.wsu.edu

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Tammy Blair
Date: 11/16/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I539-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I539-2 This is a joke, if you were to look at pictures of the Silver Valley from 20 years ago compared to now you can see that the environment is much nicer, greener. It truely amazes me everytime I go back home how green all the mountains have gotten. I grew up in the Silver Valley. Leave it alone already. Our government is already in the red and you are just driving it further. This is truely a "Fleecing of America".
Coeur d'Alene Basin Resident: No
Email Address: tblair@vetmed.wsu.edu
Mailing Address:
Phone Number:

617281

Response to comment I539-1

See response to Comment No. I351-1.

Response to comment I539-2

See response to Comment No. LJ39-5.

Bloxam, Linda, I300, Letter 614430

Upper Coeur d' Alene Basin
Linda Bloxam
to:
CDABasin
10/20/2010 02:39 PM
Show Details

I300-1 My voice speaks on behalf of the children that grew up in the" Valley of Death" we didn't have a chance of a normal childhood with my family living up DEADWOOD GULCH. The sulfur dioxide SO2 gas, which on a rainy day became acid rain which would rot our clothes if left on the clothesline overnight. We had 300 lbs of lead dust dump on us daily. we could write our names on on parent's car even make footprints in the thick lead dust. We had a cr eek run through our town which was called LEAD CREEK it was gray because of the pollution. EPA did have a monitor on my sisters home because her boys had lead levels70's-80s.where were you then EPA? Nothing was ever done, but now 50 years later you want to clean up the area what a waste of money. I'm sure I'm not alone on how I feel, really what effect does it have to clean up every other yard? I300-2

Thank You for you time

Linda Sieverding Bloxam

3762 Wyatt Rd

Cda, ID 83815

614430

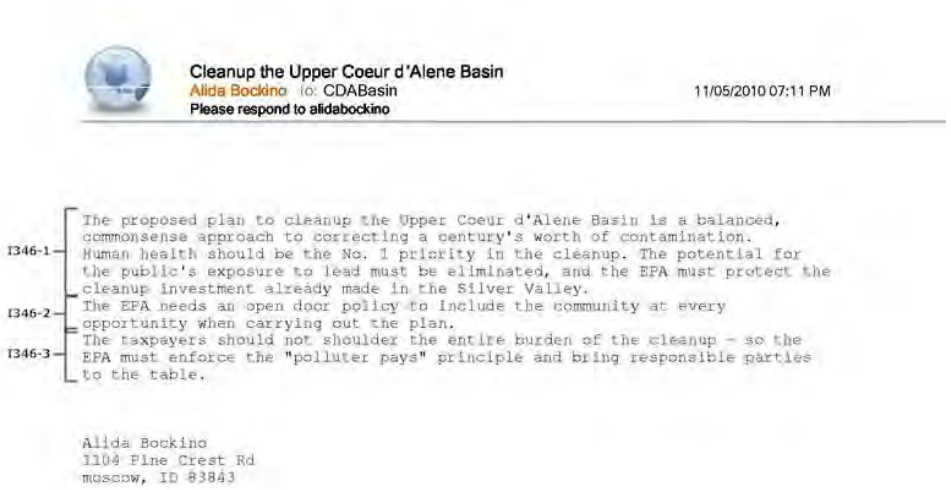
Response to comment I300-1

Thank you for your comment.

Response to comment I300-2

See response to Comment No. I521-8.

Bockino, Alida, I346, Letter 614476



Cleanup the Upper Coeur d'Alene Basin
Alida Bockino (o: CDABasin 11/05/2010 07:11 PM
Please respond to alidabockino

I346-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I346-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I346-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Alida Bockino
1104 Pine Crest Rd
moscow, ID 83843

614476

Response to comment I346-1

See response to Comment No. I295-1.

Response to comment I346-2

See response to Comment No. I295-2.

Response to comment I346-3

See response to Comment No. I295-3.

Boleneus, David, I354, Letter 616239

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
comose30438@mypacks.net to: formsubmission 11/11/2010 01:48 PM
Sent by: Comose30438@Mypacks.Net <comose30438=mypacks.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: David Boleneus
Date: 11/09/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: comose30438@mypacks.net
Mailing Address: PO Box 98|Spokane|WA|99206|US
Phone Number:

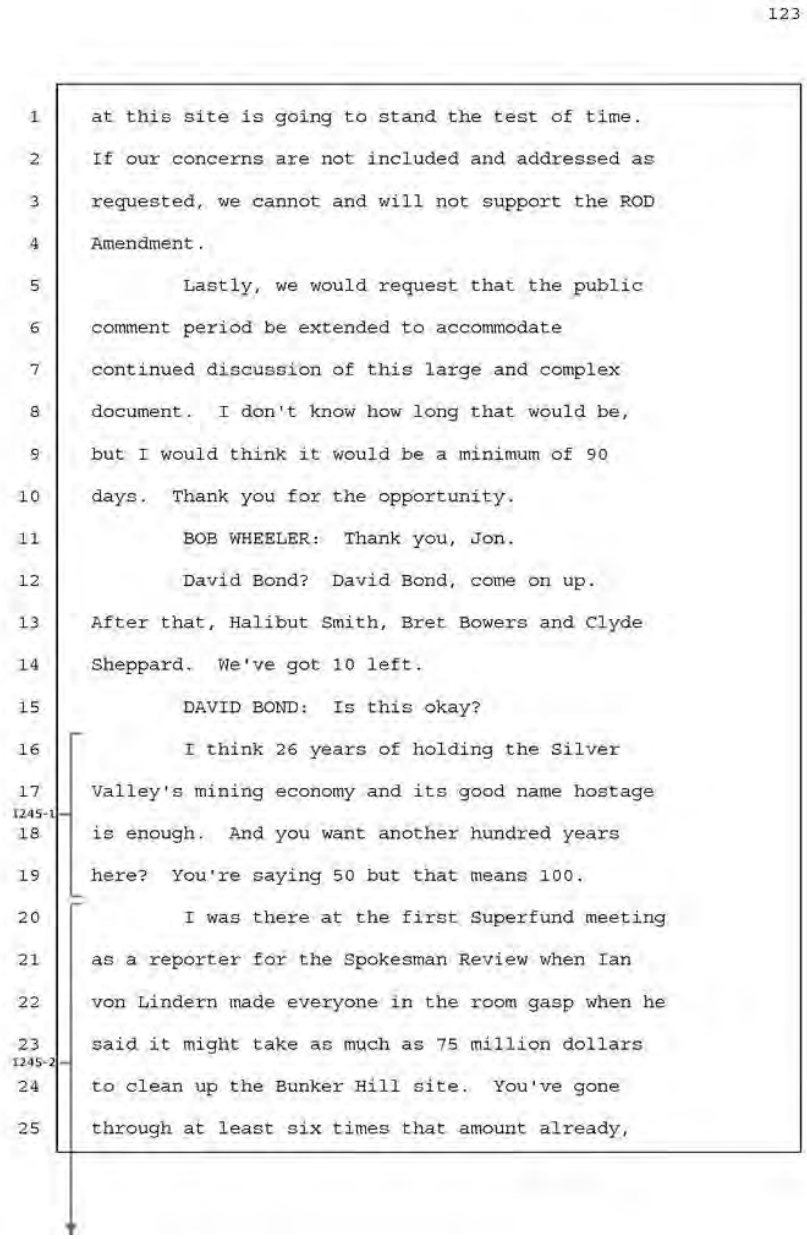
I354-1

616239

Response to comment I354-1

See response to Comment No. I351-1.

Bond, David, I245, Letter 610097-40



123

at this site is going to stand the test of time. If our concerns are not included and addressed as requested, we cannot and will not support the ROD Amendment.

Lastly, we would request that the public comment period be extended to accommodate continued discussion of this large and complex document. I don't know how long that would be, but I would think it would be a minimum of 90 days. Thank you for the opportunity.

BOB WHEELER: Thank you, Jon.

David Bond? David Bond, come on up. After that, Halibut Smith, Bret Bowers and Clyde Sheppard. We've got 10 left.

DAVID BOND: Is this okay?

I think 26 years of holding the Silver Valley's mining economy and its good name hostage I245-1 is enough. And you want another hundred years here? You're saying 50 but that means 100.

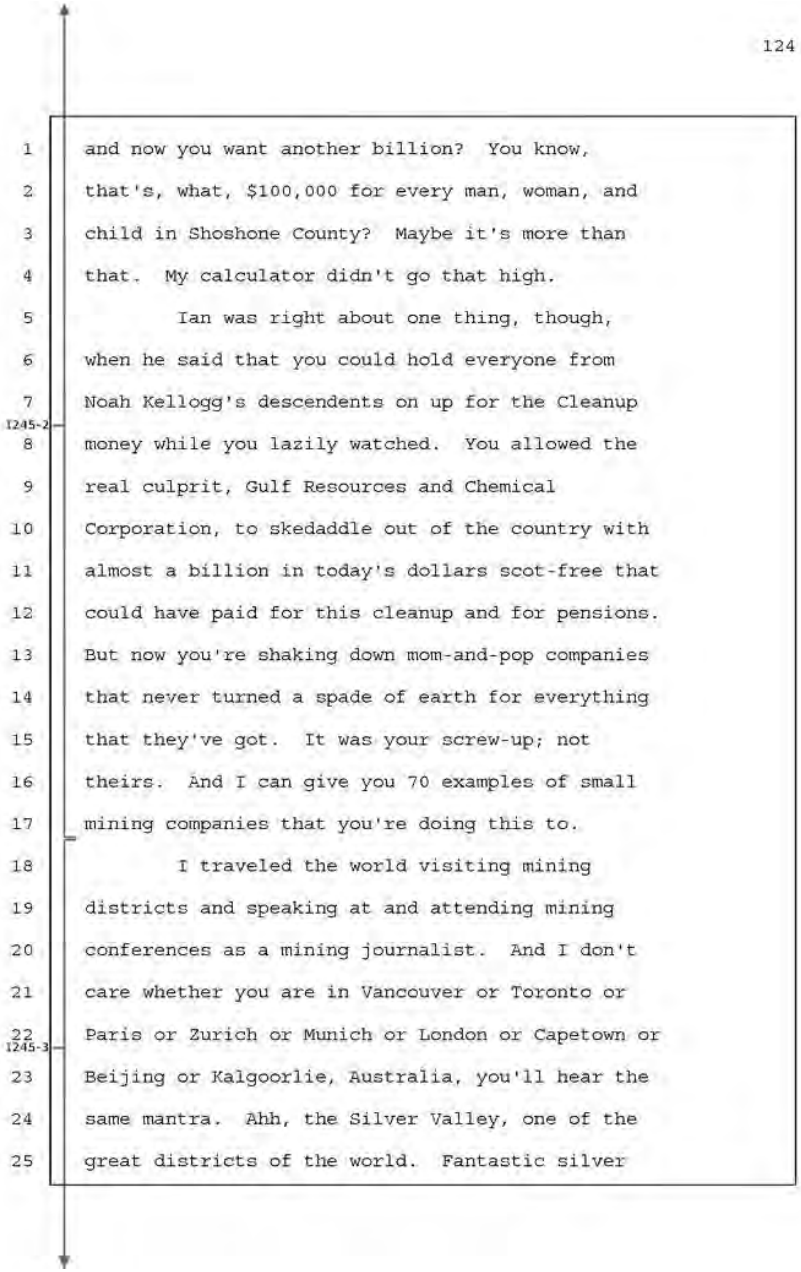
I was there at the first Superfund meeting as a reporter for the Spokesman Review when Ian von Lindern made everyone in the room gasp when he said it might take as much as 75 million dollars I245-2 to clean up the Bunker Hill site. You've gone through at least six times that amount already,

Response to comment I245-1

See responses to Comment Nos. I58-1 and I58-5.

Response to comment I245-2

In regards to Gulf Resources and Chemical Corporation, the United States pursued Gulf through its bankruptcy and recovered those assets that were available. Unfortunately the recovery did not reflect Gulf's fair share of responsibility of contamination in the Silver Valley. See response to Comment No. I58-2.



124

and now you want another billion? You know, that's, what, $100,000 for every man, woman, and child in Shoshone County? Maybe it's more than that. My calculator didn't go that high.

Ian was right about one thing, though, when he said that you could hold everyone from Noah Kellogg's descendents on up for the Cleanup money while you lazily watched. You allowed the real culprit, Gulf Resources and Chemical Corporation, to skedaddle out of the country with almost a billion in today's dollars scot-free that could have paid for this cleanup and for pensions. But now you're shaking down mom-and-pop companies that never turned a spade of earth for everything that they've got. It was your screw-up; not theirs. And I can give you 70 examples of small mining companies that you're doing this to.

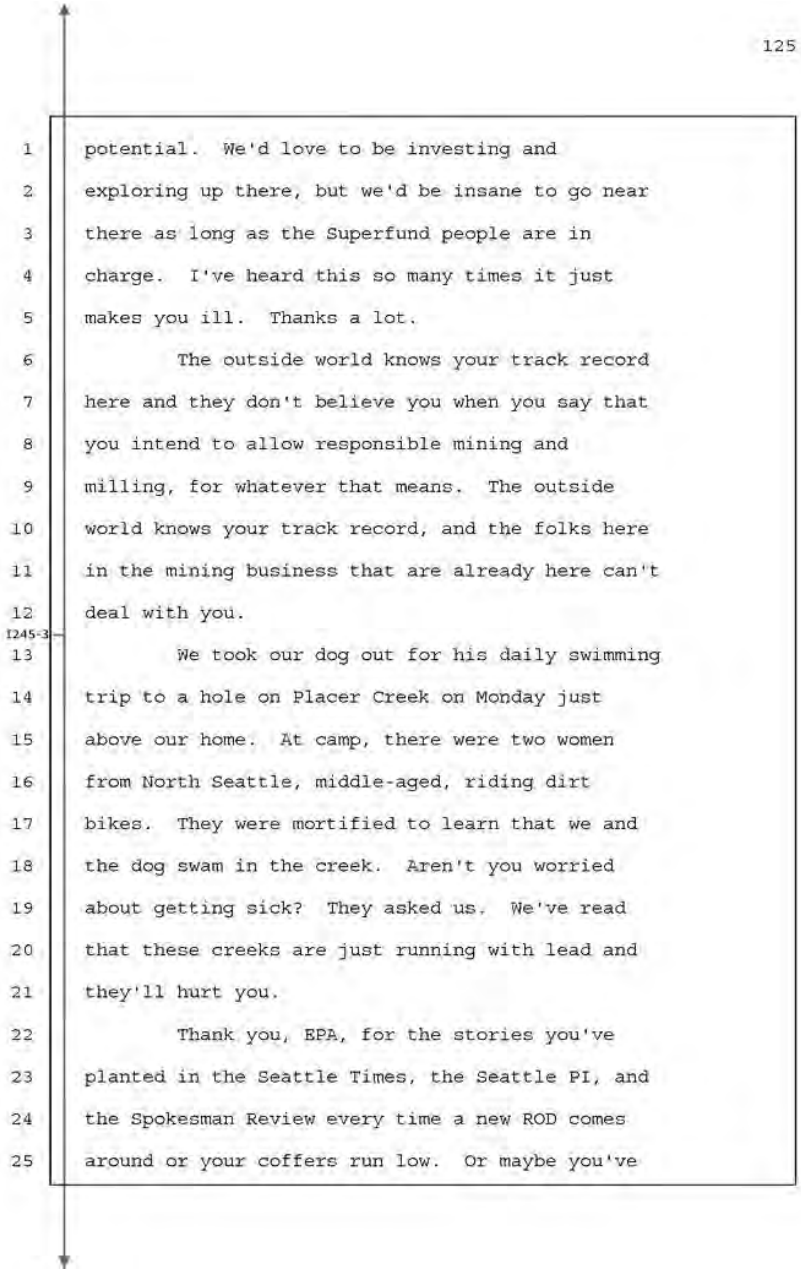
I245-2

I traveled the world visiting mining districts and speaking at and attending mining conferences as a mining journalist. And I don't care whether you are in Vancouver or Toronto or Paris or Zurich or Munich or London or Capetown or Beijing or Kalgoorlie, Australia, you'll hear the same mantra. Ahh, the Silver Valley, one of the great districts of the world. Fantastic silver

I245-3

Response to comment I245-3

See responses to Comment Nos. I54-2 and I58-5.



125

potential. We'd love to be investing and exploring up there, but we'd be insane to go near there as long as the Superfund people are in charge. I've heard this so many times it just makes you ill. Thanks a lot.

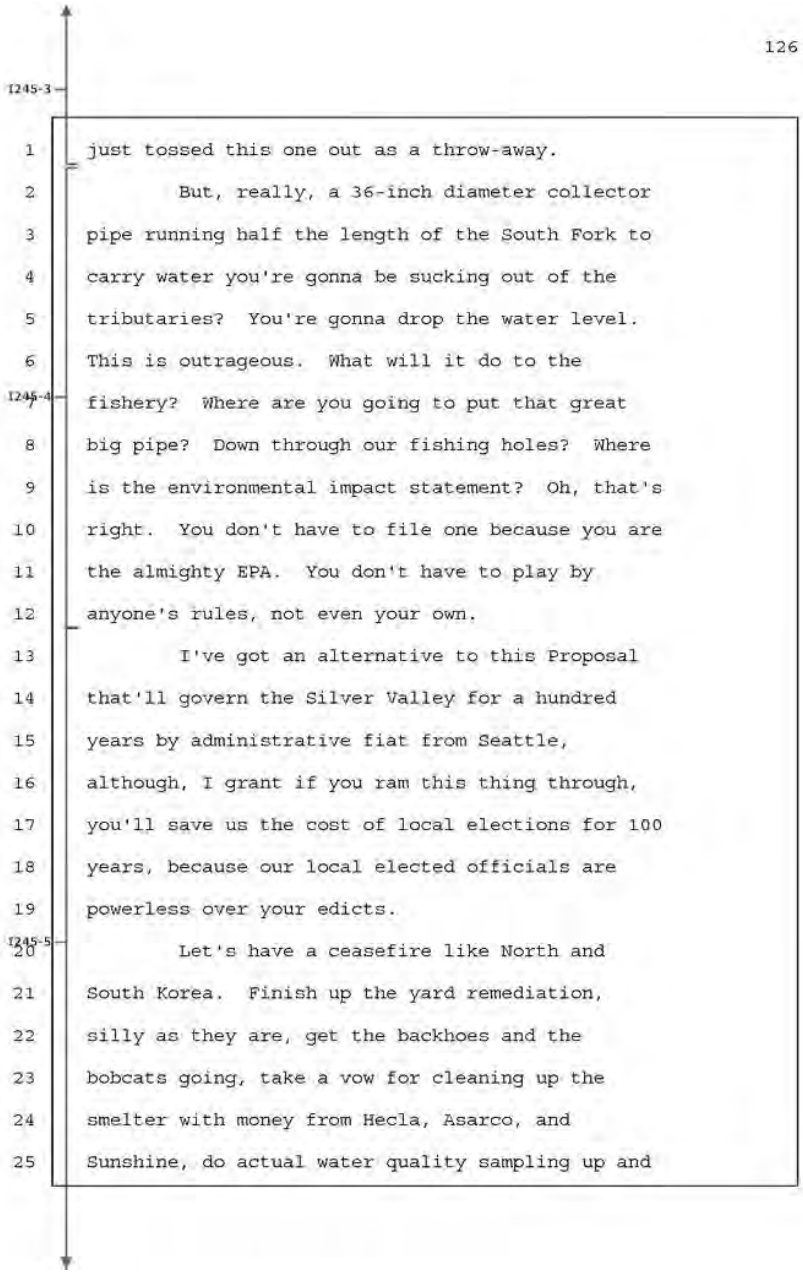
The outside world knows your track record here and they don't believe you when you say that you intend to allow responsible mining and milling, for whatever that means. The outside world knows your track record, and the folks here in the mining business that are already here can't deal with you.

I245-3

We took our dog out for his daily swimming trip to a hole on Placer Creek on Monday just above our home. At camp, there were two women from North Seattle, middle-aged, riding dirt bikes. They were mortified to learn that we and the dog swam in the creek. Aren't you worried about getting sick? They asked us. We've read that these creeks are just running with lead and they'll hurt you.

Thank you, EPA, for the stories you've planted in the Seattle Times, the Seattle PI, and the Spokesman Review every time a new ROD comes around or your coffers run low. Or maybe you've

No comments



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I245-3

just tossed this one out as a throw-away.

But, really, a 36-inch diameter collector pipe running half the length of the South Fork to carry water you're gonna be sucking out of the tributaries? You're gonna drop the water level. This is outrageous. What will it do to the

I245-4

fishery? Where are you going to put that great big pipe? Down through our fishing holes? Where is the environmental impact statement? Oh, that's right. You don't have to file one because you are the almighty EPA. You don't have to play by anyone's rules, not even your own.

I've got an alternative to this Proposal that'll govern the Silver Valley for a hundred years by administrative fiat from Seattle, although, I grant if you ram this thing through, you'll save us the cost of local elections for 100 years, because our local elected officials are powerless over your edicts.

I245-5

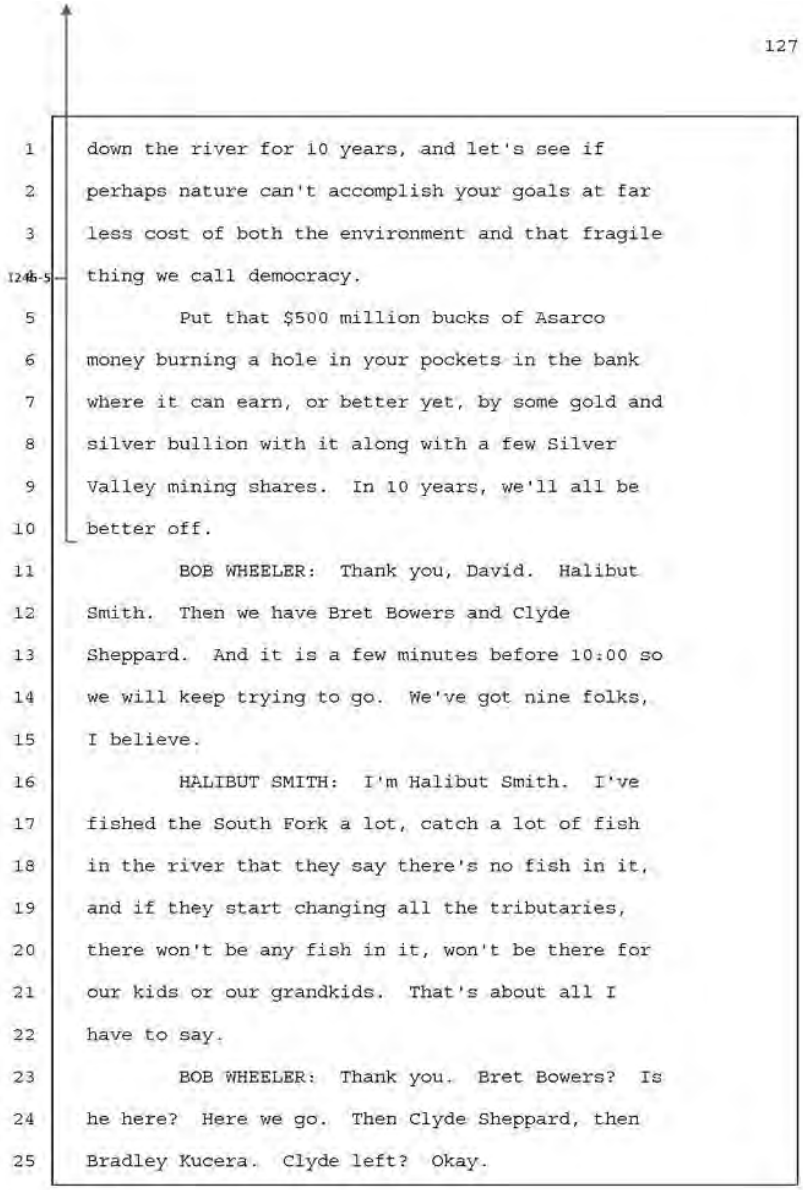
Let's have a ceasefire like North and South Korea. Finish up the yard remediation, silly as they are, get the backhoes and the bobcats going, take a vow for cleaning up the smelter with money from Hecla, Asarco, and Sunshine, do actual water quality sampling up and

Response to comment I245-4

See response to Comment No. I54-8 regarding water treatment and potential streamflow reduction. In regards to citing a pipeline for conveyance of contaminated water EPA will need to obtain access from property owners prior to design and construction of a pipeline. EPA will make every effort to minimize disruption to any private property owners. Finally, a logical corridor for the pipeline would be within the right of way of the Trail of the Coeur d'Alenes. In this area access would be straightforward and minimize or eliminate any impact to private property.

Response to comment I245-5

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment.



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down the river for 10 years, and let's see if perhaps nature can't accomplish your goals at far less cost of both the environment and that fragile thing we call democracy.

Put that $500 million bucks of Asarco money burning a hole in your pockets in the bank where it can earn, or better yet, by some gold and silver bullion with it along with a few Silver Valley mining shares. In 10 years, we'll all be better off.

BOB WHEELER: Thank you, David. Halibut Smith. Then we have Bret Bowers and Clyde Sheppard. And it is a few minutes before 10:00 so we will keep trying to go. We've got nine folks, I believe.

HALIBUT SMITH: I'm Halibut Smith. I've fished the South Fork a lot, catch a lot of fish in the river that they say there's no fish in it, and if they start changing all the tributaries, there won't be any fish in it, won't be there for our kids or our grandkids. That's about all I have to say.

BOB WHEELER: Thank you. Bret Bowers? Is he here? Here we go. Then Clyde Sheppard, then Bradley Kucera. Clyde left? Okay.

I246-5

No comments

Bond, David, I274, Letter 616015-38

used in a more wisely way. If the EPA forces its ROD amendment on us, I would like to see the EPA guarantee mining in the valley and writing that their jobs to be safe and that mining construction in the valley will continue, but I don't think that the EPA will employ everyone in the valley if they shut down the mines. When the [sort of] money is gone, where will the EPA guys go? What will these people that are left here do? I don't know but what I do know is I would like to grow old, retire here with my wife and grandchildren in this valley. Thank you very much.

Susan Mitchell: I'm Susan Mitchell. I'm from Cataldo and I experienced all [the PMF] when that whole process was unfolding. I believe that there continues to be need for cleanup that has to be carefully evaluated as we proceed and that community involvement is critically important in whatever ways we move forward. So I just specifically like to say that I see there's really a need for technical assistance that the research that's done by EPA we seldom, almost never have any opportunity to bring in outside scientific evaluation to analyze outward. So this puts the community in a position of not knowing if that information is valid or if there are other possibilities that would be equally as effective or perhaps there would be a trade-off cost-wise and they would be viable alternatives. So I just want to put in a word for that. Thank you.

David Bond: I think the fact that's not widely understood is that mining is a truly global industry and so is the financing. In the last half dozen years or so, I have covered that aspect of it for a publisher in New York and I get around in the financial capitals of Europe and North America at least once a year; Paris, Zurich, London, Munich, Toronto, New York, Vancouver, I never realized till my first kind of swing through about half a dozen years ago just how famous Coeur d'Alene mining district is. Everybody in the financing end of financing capital-intensive projects like mining is [frivolous], but here's a regrettable mantra and I've heard one time over or 500 times. "Ah, the Silver Valley. Great district, fantastic silver, lead and zinc [we can do]. We'd love to be exploring or investing here but we'd be out of our minds to put a penny into that camp as long as you have those Superfund people running around." That's God's honest truth. So if you think the EPA has low credibility in this camp, consider it as equally - even lower credibility

I274-1

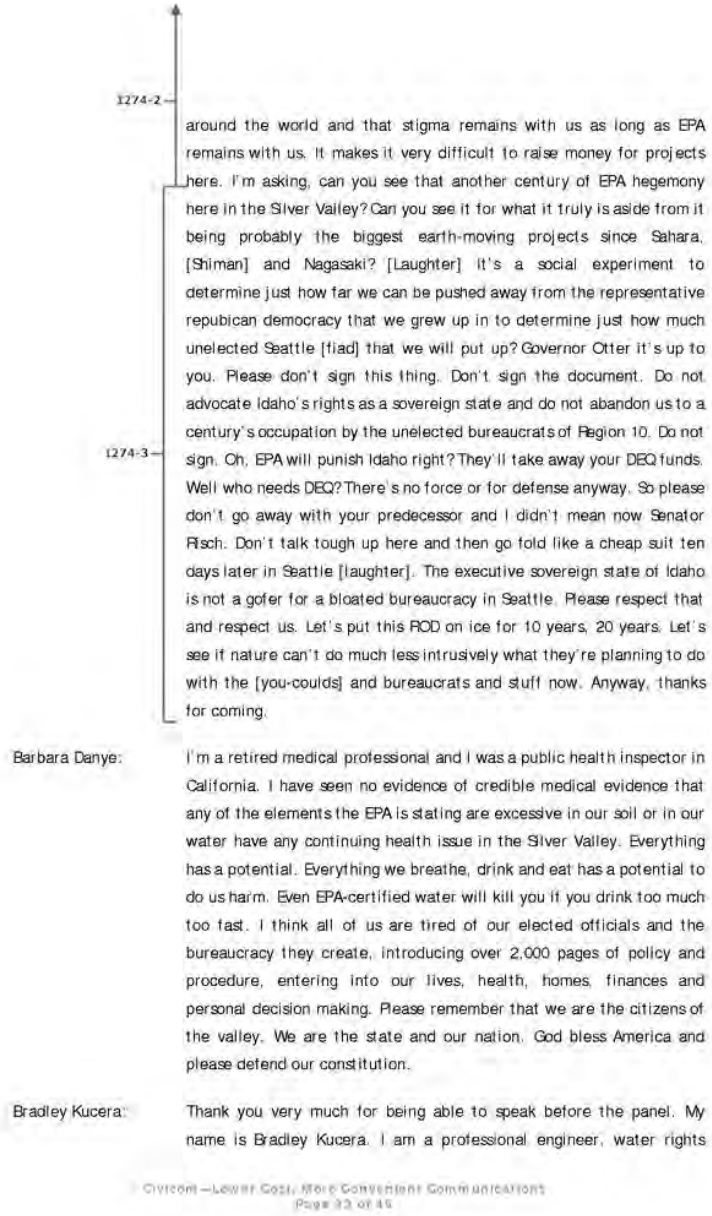
I274-2

Response to comment I274-1

Thank you for your comment.

Response to comment I274-2

See response to Comment No. I58-5.



I274-2

around the world and that stigma remains with us as long as EPA remains with us. It makes it very difficult to raise money for projects here. I'm asking, can you see that another century of EPA hegemony here in the Silver Valley? Can you see it for what it truly is aside from it being probably the biggest earth-moving projects since Sahara, [Shiman] and Nagasaki? [Laughter] It's a social experiment to determine just how far we can be pushed away from the representative republican democracy that we grew up in to determine just how much unelected Seattle [fiad] that we will put up? Governor Otter it's up to you. Please don't sign this thing. Don't sign the document. Do not advocate Idaho's rights as a sovereign state and do not abandon us to a century's occupation by the unelected bureaucrats of Region 10. Do not

I274-3

sign. Oh, EPA will punish Idaho right? They'll take away your DEQ funds. Well who needs DEQ? There's no force or for defense anyway. So please don't go away with your predecessor and I didn't mean now Senator Risch. Don't talk tough up here and then go fold like a cheap suit ten days later in Seattle [laughter]. The executive sovereign state of Idaho is not a gofer for a bloated bureaucracy in Seattle. Please respect that and respect us. Let's put this ROD on ice for 10 years, 20 years. Let's see if nature can't do much less intrusively what they're planning to do with the [you-coulds] and bureaucrats and stuff now. Anyway, thanks for coming.

Barbara Danye: I'm a retired medical professional and I was a public health inspector in California. I have seen no evidence of credible medical evidence that any of the elements the EPA is stating are excessive in our soil or in our water have any continuing health issue in the Silver Valley. Everything has a potential. Everything we breathe, drink and eat has a potential to do us harm. Even EPA-certified water will kill you if you drink too much too fast. I think all of us are tired of our elected officials and the bureaucracy they create, introducing over 2,000 pages of policy and procedure, entering into our lives, health, homes, finances and personal decision making. Please remember that we are the citizens of the valley. We are the state and our nation. God bless America and please defend our constitution.

Bradley Kucera: Thank you very much for being able to speak before the panel. My name is Bradley Kucera. I am a professional engineer, water rights

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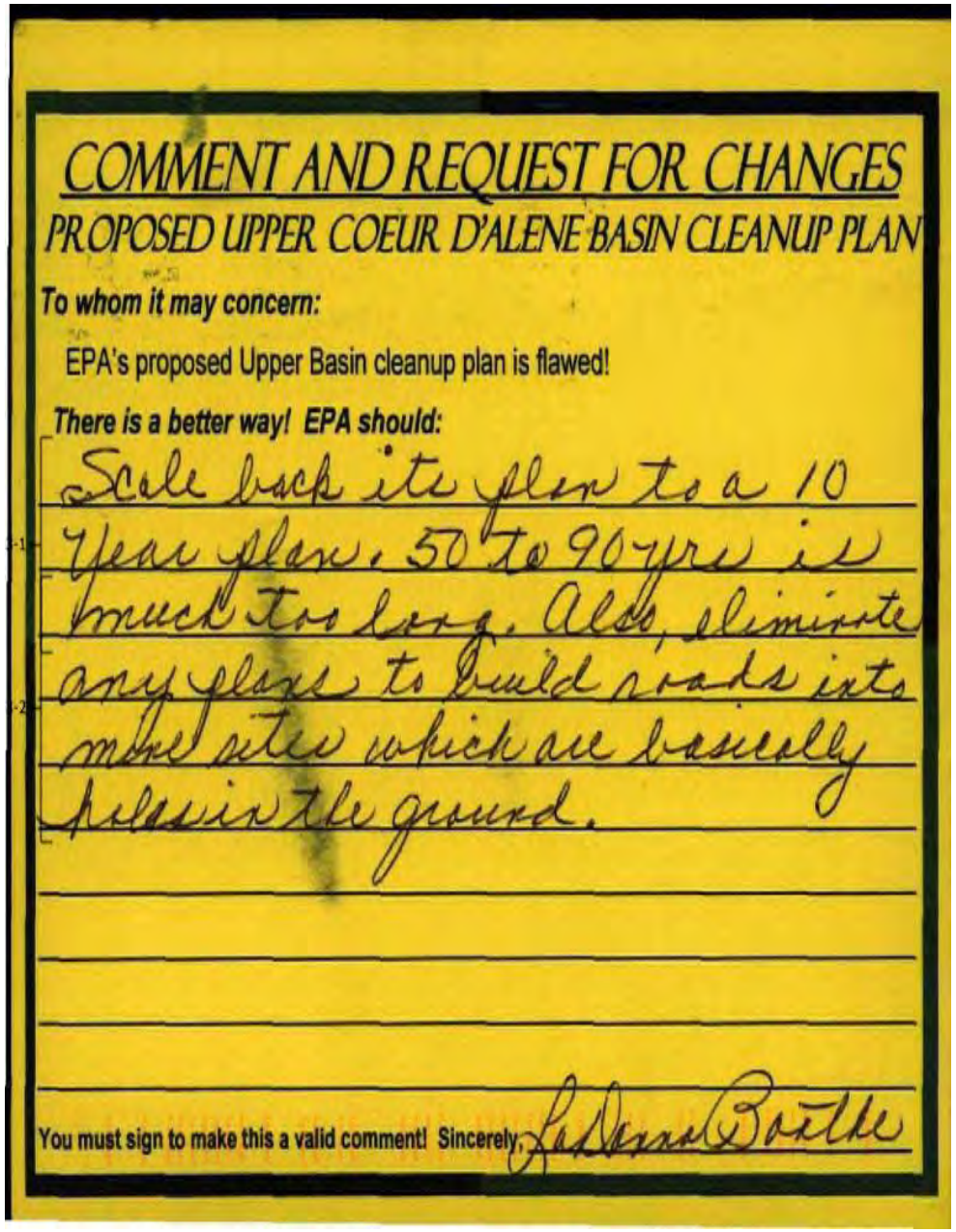
Response to comment I274-3

Comment noted.

Boothe, La Donna, I463, Letter 1308800



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

I-1 Scale back its plan to a 10 Year plan. 50 to 90 yrs is much too long. Also, eliminate

I-2 any plans to build roads into mine sites which are basically below the ground.

You must sign to make this a valid comment! Sincerely, La Donna Boothe

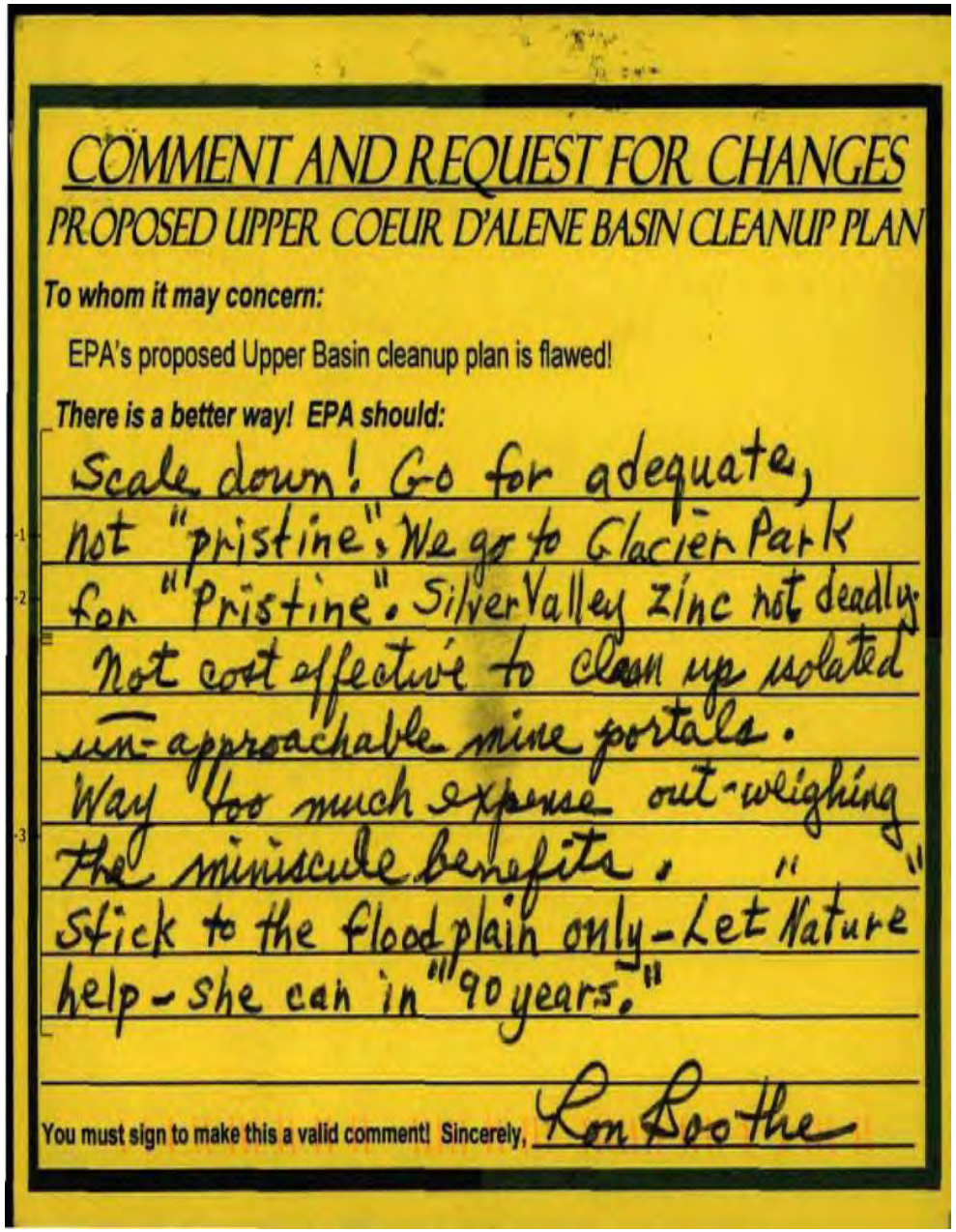
Response to comment I463-1

See responses to Comment Nos. I58-1 and I474-2.

Response to comment I463-2

See response to Comment No. I822-14.

Boothe, Ron, I464, Letter 1308801



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

Scale down! Go for adequate,
not "pristine". We go to Glacier Park
for "Pristine". Silver Valley zinc not deadly.
Not cost effective to clean up isolated
un-approachable mine portals.
Way too much expense out-weighing
the miniscule benefits. " "
Stick to the flood plain only - Let Nature
help - She can in "90 years."

You must sign to make this a valid comment! Sincerely, Ron Boothe

Response to comment I464-1

See response to Comment No. I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative in the Proposed Plan. EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment.

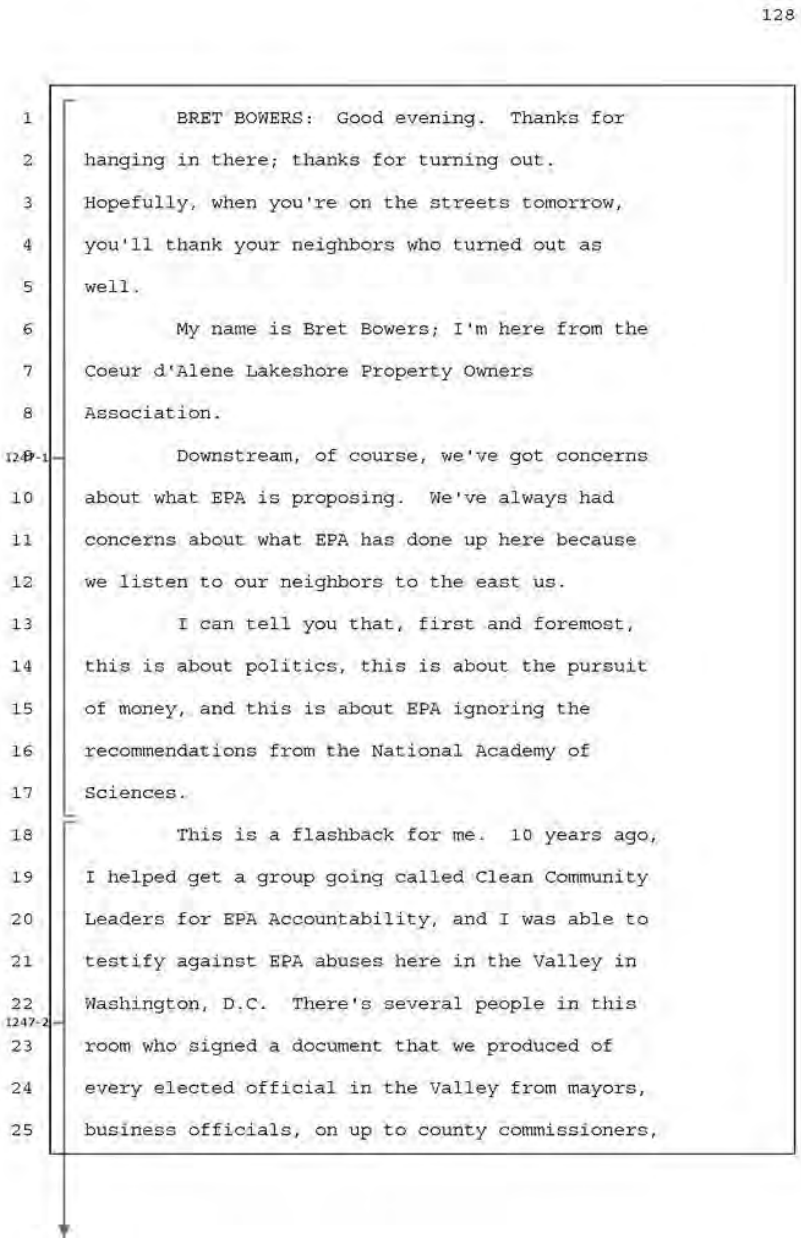
Response to comment I464-2

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. As documented in the FFS, Proposed Plan and ROD Amendment, past studies have documented these unacceptable risks which include excessive concentrations of zinc in streams. Zinc has severe adverse effects on fish at the concentrations found and warrants remediation of sources of zinc. The Selected Remedy will make significant progress in diminishing this unacceptable risk.

Response to comment I464-3

See response to Comment No. I58-1.

Bowers, Bret, I247, Letter 610097-42



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BRET BOWERS: Good evening. Thanks for hanging in there; thanks for turning out. Hopefully, when you're on the streets tomorrow, you'll thank your neighbors who turned out as well.

My name is Bret Bowers; I'm here from the Coeur d'Alene Lakeshore Property Owners Association.

I247-1 Downstream, of course, we've got concerns about what EPA is proposing. We've always had concerns about what EPA has done up here because we listen to our neighbors to the east us.

I can tell you that, first and foremost, this is about politics, this is about the pursuit of money, and this is about EPA ignoring the recommendations from the National Academy of Sciences.

This is a flashback for me. 10 years ago, I helped get a group going called Clean Community Leaders for EPA Accountability, and I was able to testify against EPA abuses here in the Valley in Washington, D.C. There's several people in this

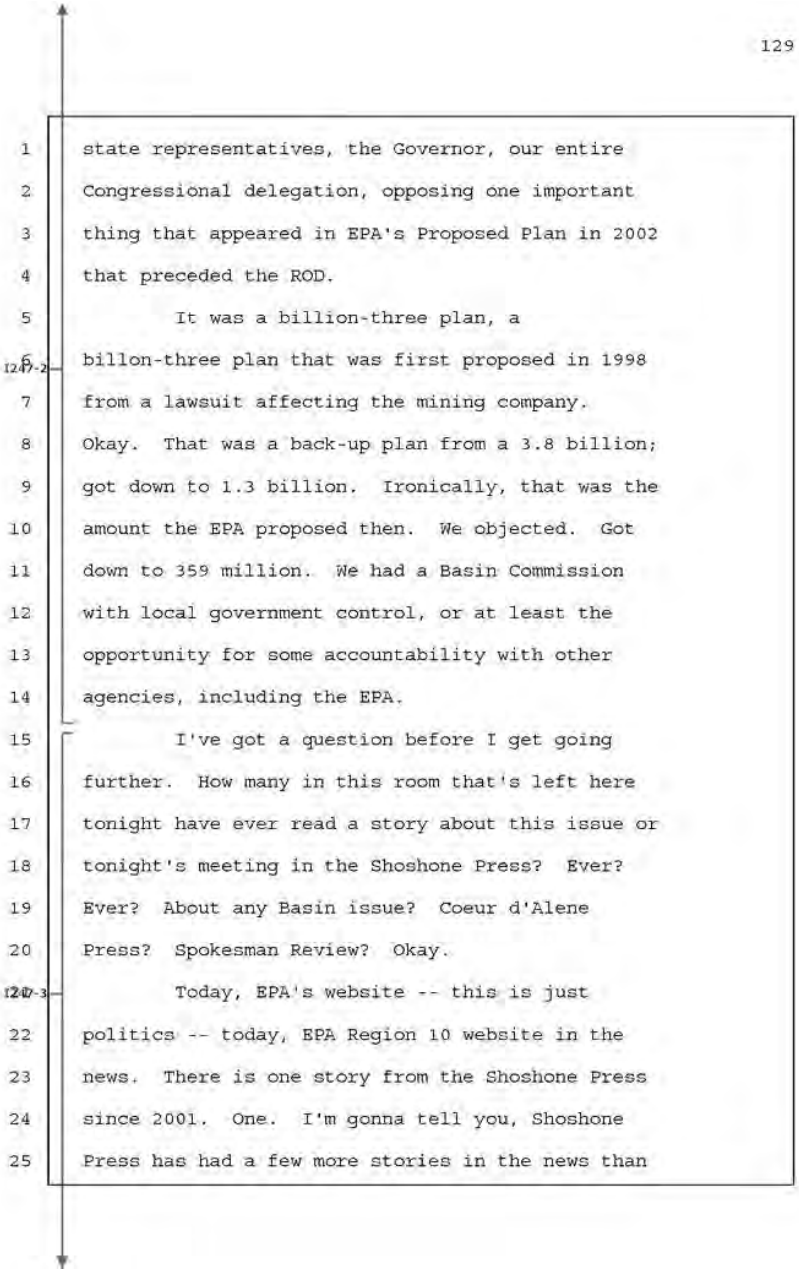
I247-2 room who signed a document that we produced of every elected official in the Valley from mayors, business officials, on up to county commissioners,

Response to comment I247-1

See response to Comment No. LJ27-8.

Response to comment I247-2

See responses to Comment Nos. I58-1, I295-1, and I295-2.



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state representatives, the Governor, our entire Congressional delegation, opposing one important thing that appeared in EPA's Proposed Plan in 2002 that preceded the ROD.

It was a billion-three plan, a billon-three plan that was first proposed in 1998 from a lawsuit affecting the mining company. Okay. That was a back-up plan from a 3.8 billion; got down to 1.3 billion. Ironically, that was the amount the EPA proposed then. We objected. Got down to 359 million. We had a Basin Commission with local government control, or at least the opportunity for some accountability with other agencies, including the EPA.

I247-2

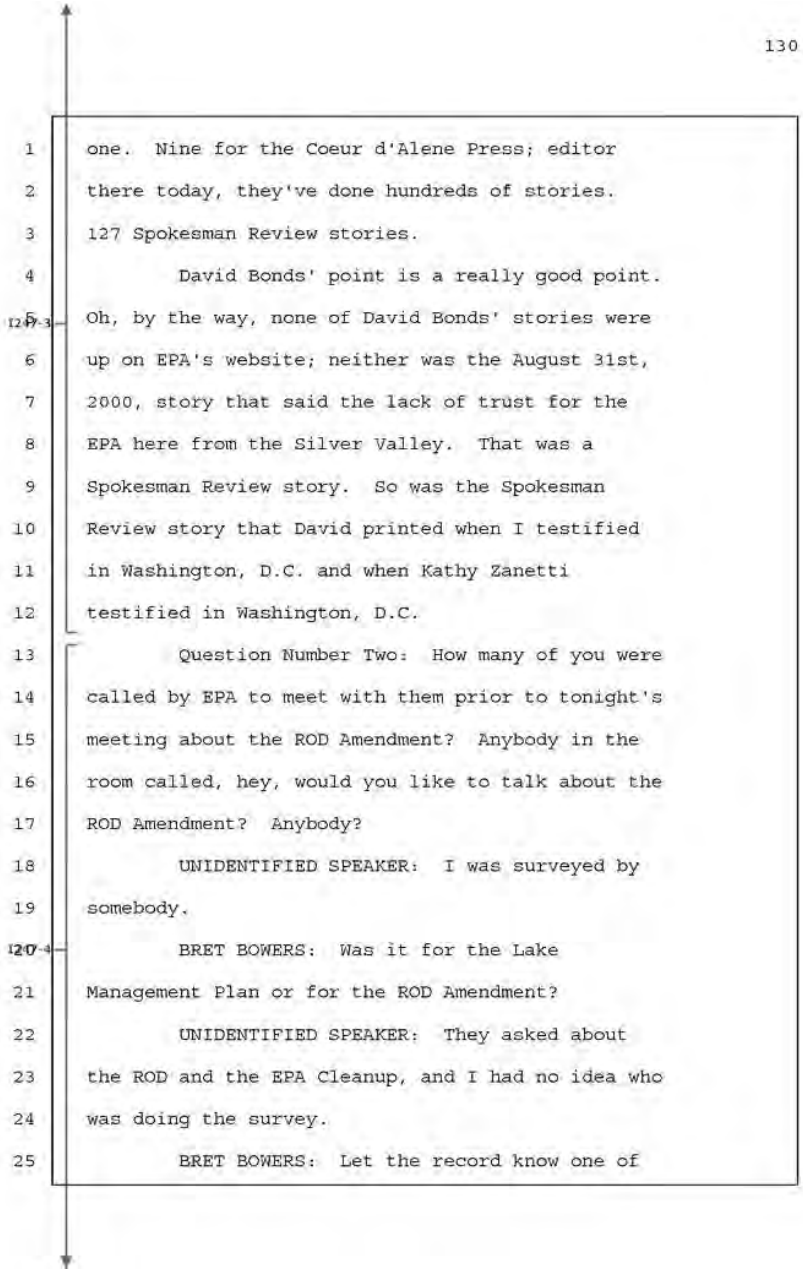
I've got a question before I get going further. How many in this room that's left here tonight have ever read a story about this issue or tonight's meeting in the Shoshone Press? Ever? Ever? About any Basin issue? Coeur d'Alene Press? Spokesman Review? Okay.

I247-3

Today, EPA's website -- this is just politics -- today, EPA Region 10 website in the news. There is one story from the Shoshone Press since 2001. One. I'm gonna tell you, Shoshone Press has had a few more stories in the news than

Response to comment I247-3

Thank you for your comment.



130

one. Nine for the Coeur d'Alene Press; editor there today, they've done hundreds of stories. 127 Spokesman Review stories.

David Bonds' point is a really good point. Oh, by the way, none of David Bonds' stories were up on EPA's website; neither was the August 31st, 2000, story that said the lack of trust for the EPA here from the Silver Valley. That was a Spokesman Review story. So was the Spokesman Review story that David printed when I testified in Washington, D.C. and when Kathy Zanetti testified in Washington, D.C.

Question Number Two: How many of you were called by EPA to meet with them prior to tonight's meeting about the ROD Amendment? Anybody in the room called, hey, would you like to talk about the ROD Amendment? Anybody?

UNIDENTIFIED SPEAKER: I was surveyed by somebody.

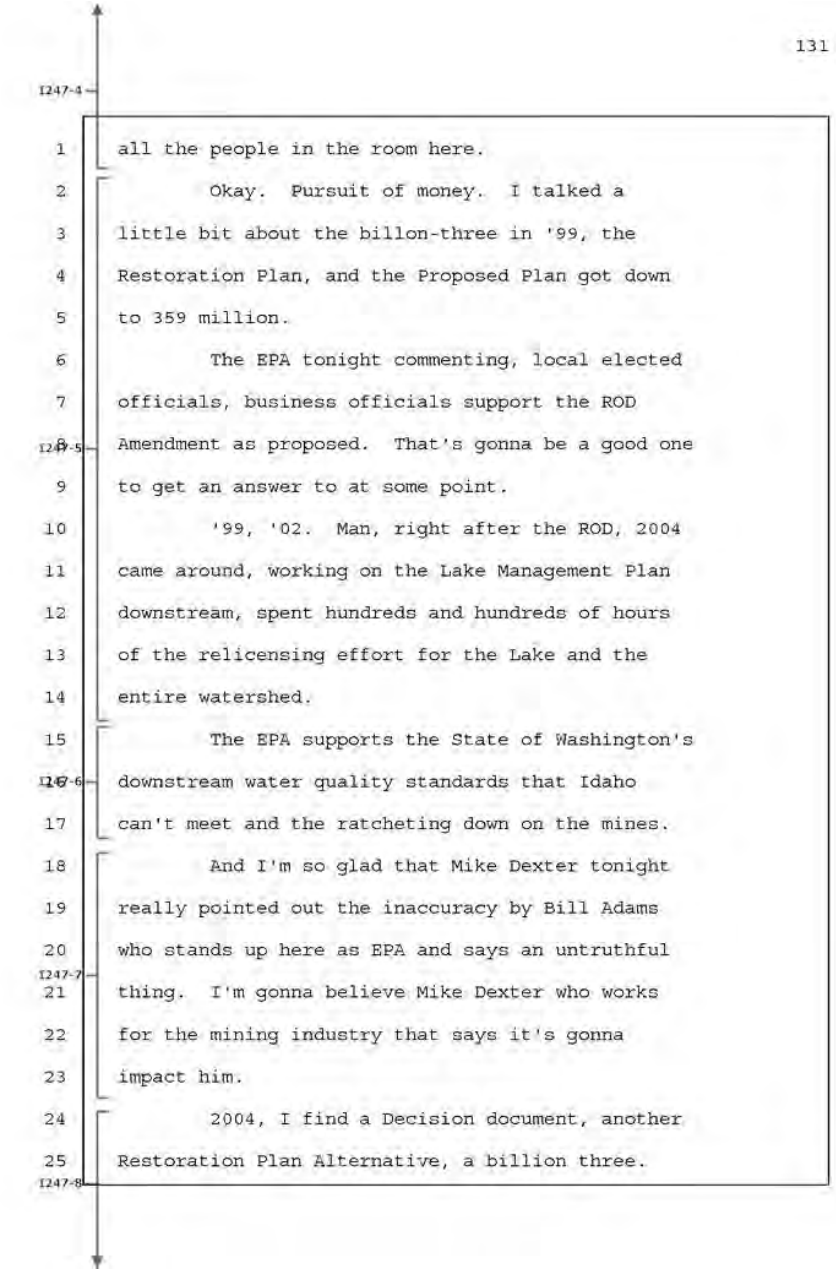
BRET BOWERS: Was it for the Lake Management Plan or for the ROD Amendment?

UNIDENTIFIED SPEAKER: They asked about the ROD and the EPA Cleanup, and I had no idea who was doing the survey.

BRET BOWERS: Let the record know one of

Response to comment I247-4

See response to Comment No. I295-2.



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I247-4

all the people in the room here.

Okay. Pursuit of money. I talked a little bit about the billon-three in '99, the Restoration Plan, and the Proposed Plan got down to 359 million.

The EPA tonight commenting, local elected officials, business officials support the ROD

I247-5 Amendment as proposed. That's gonna be a good one to get an answer to at some point.

'99, '02. Man, right after the ROD, 2004 came around, working on the Lake Management Plan downstream, spent hundreds and hundreds of hours of the relicensing effort for the Lake and the entire watershed.

The EPA supports the State of Washington's

I247-6 downstream water quality standards that Idaho can't meet and the ratcheting down on the mines.

And I'm so glad that Mike Dexter tonight really pointed out the inaccuracy by Bill Adams who stands up here as EPA and says an untruthful

I247-7 thing. I'm gonna believe Mike Dexter who works for the mining industry that says it's gonna impact him.

2004, I find a Decision document, another Restoration Plan Alternative, a billion three.

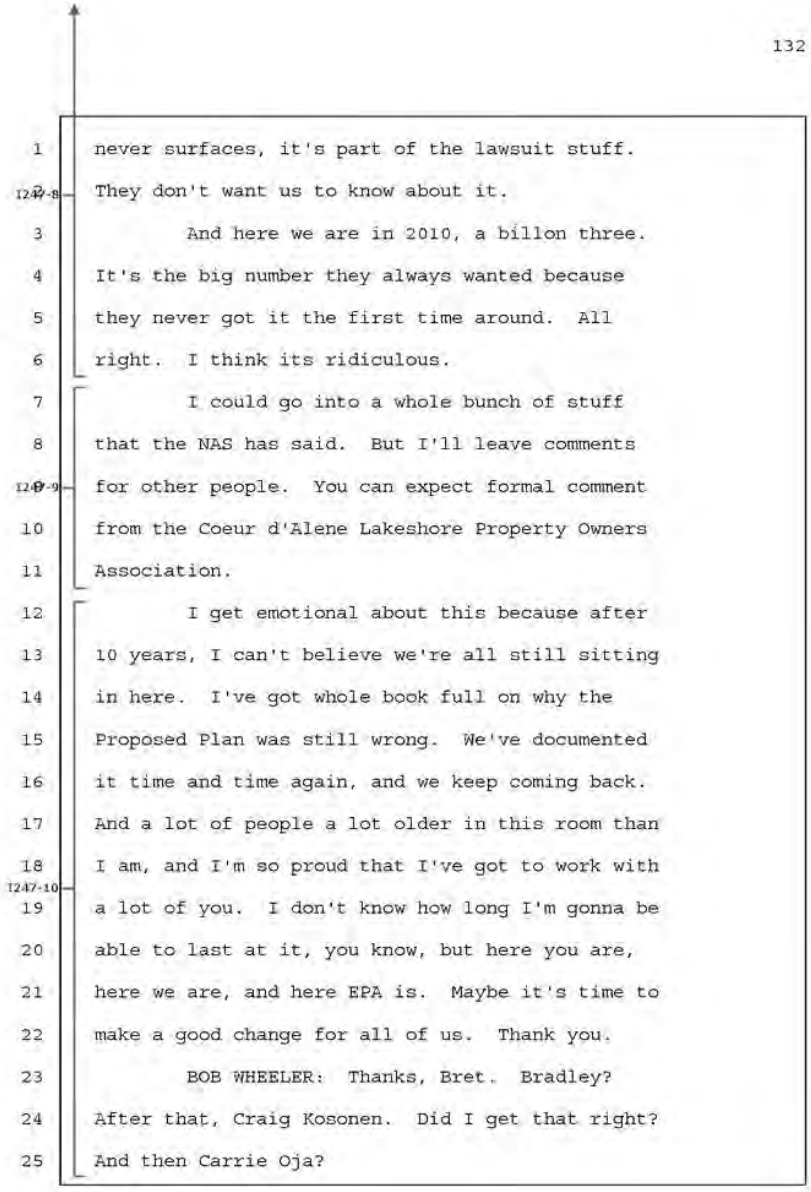
I247-8

Response to comment I247-5
Comment noted.

Response to comment I247-6
Comment noted. The cleanup levels for surface water are site-specific criteria developed by the state of Idaho for the SFCDR and its tributaries. See the ROD Amendment Decision Summary (Part 2) Section 8.0 for more detail. Local mines operating within this area are required to meet discharge requirements based on these site specific standards.

Response to comment I247-7
See response to Comment No. I58-5.

Response to comment I247-8
EPA's cleanup decisions are not driven by litigation but are based on well documented risks to human health and the environment. See response to Comment No. I58-2.



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never surfaces, it's part of the lawsuit stuff. They don't want us to know about it.

I247-8

And here we are in 2010, a billon three. It's the big number they always wanted because they never got it the first time around. All right. I think its ridiculous.

I could go into a whole bunch of stuff that the NAS has said. But I'll leave comments for other people. You can expect formal comment from the Coeur d'Alene Lakeshore Property Owners Association.

I247-9

I get emotional about this because after 10 years, I can't believe we're all still sitting in here. I've got whole book full on why the Proposed Plan was still wrong. We've documented it time and time again, and we keep coming back. And a lot of people a lot older in this room than I am, and I'm so proud that I've got to work with a lot of you. I don't know how long I'm gonna be able to last at it, you know, but here you are, here we are, and here EPA is. Maybe it's time to make a good change for all of us. Thank you.

I247-10

BOB WHEELER: Thanks, Bret. Bradley? After that, Craig Kosonen. Did I get that right? And then Carrie Oja?

Response to comment I247-9

Thank you for your comment. EPA has responded separately to formal comments from the Coeur d'Alene Lakeshore Property Owners Association (see Document LC37).

Response to comment I247-10

Thank you for your comments.

Braach, Buddy, I355, Letter 616240

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
buddybraach@wseco.com to: formsubmission 11/09/2010 09:52 AM
Sent by: Buddybraach@Wseco.Com <buddybraach=wseco.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Buddy Braach
Date: 11/09/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: buddybraach@wseco.com
Mailing Address: 10780 N Hwy 95, 10780 N Hwy 95|Hayden, id|Idaho|Hayden, id|US
Phone Number: (208) 762-6600

I355-1

616240

Response to comment I355-1

See response to Comment No. I351-1.

Brackenbusch, Fred, I4, Letter 896727

ROD Amendment comments by: Fred W. Brackebusch
Date: 4 Aug 2010

SHARE THE WEALTH

I won't comment about the huge amount of money to be spent, or the unbelievable time frame approaching a century, or about the high potential of waste, or that bureaucracies are good at perpetuating themselves and looking after their own interests instead of the public interest, or even that it seems a waste of time to comment because your comments will be ignored.

What I want to say, instead, is "share the wealth."

I'm not just talking about seasonal jobs either.

Mines in this valley are starving for capital to conduct exploration and to expand their operations.

I4-1

Why not invest the ½ billion dollars in the Asarco trust fund right here in the Silver Valley? After all the ½ billion did not come from investment in government bonds – it came from making lots of money in the copper mining business.

I think everyone would agree that increased economic activity would be welcomed by everyone living in the Valley and should be welcomed by EPA as well.

There are lots of good mining investments available with much better rates of return than bonds. One that comes to mind is the planned deep shaft at the Lucky Friday. Perhaps the trustee could loan $100 million to the Lucky Friday to help assure another 25 years of jobs and operations. Undoubtedly there are many other good projects available in mining and related businesses right here in the Valley.

Share the wealth.

896727

Response to comment I4-1

See responses to Comment Nos. I58-2 and I474-1.

Brackenbusch, Grant, I5, Letter 896728

Upper Coeur d'Alene Basin Cleanup Plan Comments
Grant A. Brackebusch
to:
CDABasin
08/04/2010 02:05 PM
Show Details

To: USEPA

Date: August 4, 2010

Subject: Upper Coeur d'Alene Basin Cleanup Plan

I5-1 After reading through the supporting documents on the EPA's website, I noticed one of the benefits expected from the implementation of the Preferred Alternative is a significant reduction in groundwater contamination levels and the contribution of contaminated groundwater to surface water. However, as CH2M Hill mentions in their report, the subsurface contamination is pervasive so drinking water standards may not be achieved by remediation efforts in some places.

I5-2 Another benefit claimed by the EPA of its Upper CDA Basin Cleanup Plan is the creation of cleanup jobs that will help to diversify the economy of the Silver Valley. Unfortunately, the majority of cleanup jobs that will be created by the plan will be seasonal and without benefits. Additionally, the wages will most likely be reduced from their current level as the trustee for the Asarco Settlement Fund will not be bound to pay Davis-Bacon wages.

I5-3 In my estimation, the EPA should propose a preferred alternative that would deal with both of these problems - the pervasive subsurface contamination and the seasonal jobs without benefits. An obvious solution to these problems is to remove the pervasive subsurface contamination to a reasonable depth, say 15,000 feet. This would provide year-round employment in order to excavate the subsurface contamination, separate the contamination from the clean rock and concentrate the contamination into a saleable product. The concentrated contamination could be sold to foreign processing plants which would remove the contamination from the Basin and also offset the cost of contamination removal. A portion of the clean rock liberated from the contamination could be placed back underground with the remaining portion placed in repositories. Finally, this plan would present a long term solution for the Basin as it would take millions of years for the erosive surface to reach the unexcavated contaminants.

Has the USEPA considered such an alternative?

Regards,
Grant Brackebusch, P.E.
Silverton, Idaho

E-mail message checked by Spyware Doctor (7.0.0.514)
Database version: 6.15580
http://www.pctools.com/spyware-doctor-antivirus/

896728

Response to comment I5-1

It is correct that drinking water standards may not be achieved in all locations following implementation of the Selected Remedy. In addition, EPA has reduced the scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. The Selected Remedy is expected to result in significant improvements to surface water quality in the Upper Basin and may achieve ambient water quality criteria (AWQC) applicable and relevant or appropriate requirements (ARARs) under the Clean Water Act in many locations; however, it may not achieve these AWQC ARARs at all locations. The Selected Remedy is also expected to greatly reduce both groundwater contamination levels and the contribution of contaminated groundwater to surface water. However, given the pervasive nature of the subsurface contamination, the Selected Remedy is not expected to achieve the groundwater ARARs under the Safe Drinking Water Act at all locations. EPA will evaluate future monitoring data to determine whether additional actions are needed or would be effective in meeting drinking water standards and AWQC.

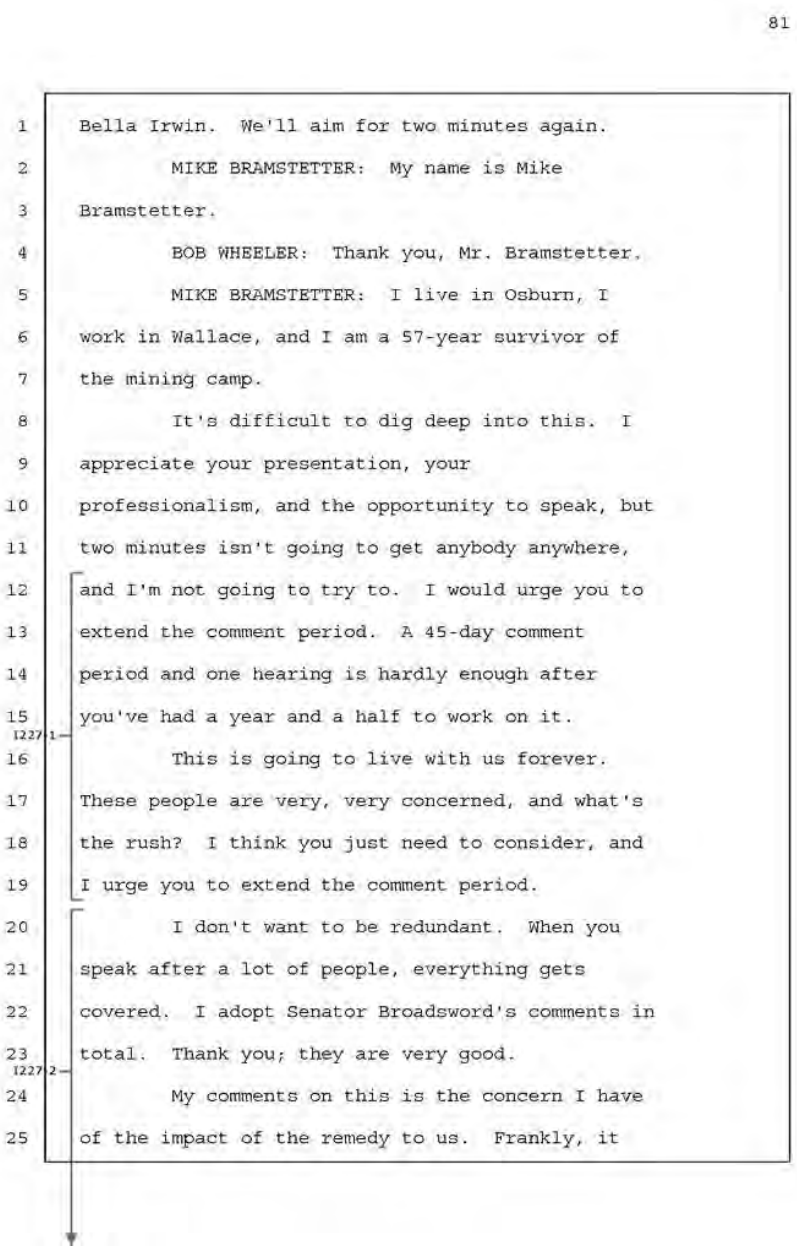
Response to comment I5-2

See response to Comment No. LC32-2.

Response to comment I5-3

No, EPA has not considered such an alternative. At this time, there are no economically viable processes by which to concentrate the contamination that is present throughout the Upper Basin into a "saleable product". However, through the adaptive management process, EPA will continue to consider new technologies and should such a process become economically viable, it will be considered.

Bramstetter, Mike, I227, Letter 610097-22



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Bella Irwin. We'll aim for two minutes again.

MIKE BRAMSTETTER: My name is Mike Bramstetter.

BOB WHEELER: Thank you, Mr. Bramstetter.

MIKE BRAMSTETTER: I live in Osburn, I work in Wallace, and I am a 57-year survivor of the mining camp.

It's difficult to dig deep into this. I appreciate your presentation, your professionalism, and the opportunity to speak, but two minutes isn't going to get anybody anywhere, and I'm not going to try to. I would urge you to extend the comment period. A 45-day comment period and one hearing is hardly enough after you've had a year and a half to work on it. I227-1

This is going to live with us forever. These people are very, very concerned, and what's the rush? I think you just need to consider, and I urge you to extend the comment period.

I don't want to be redundant. When you speak after a lot of people, everything gets covered. I adopt Senator Broadsword's comments in total. Thank you; they are very good. I227-2

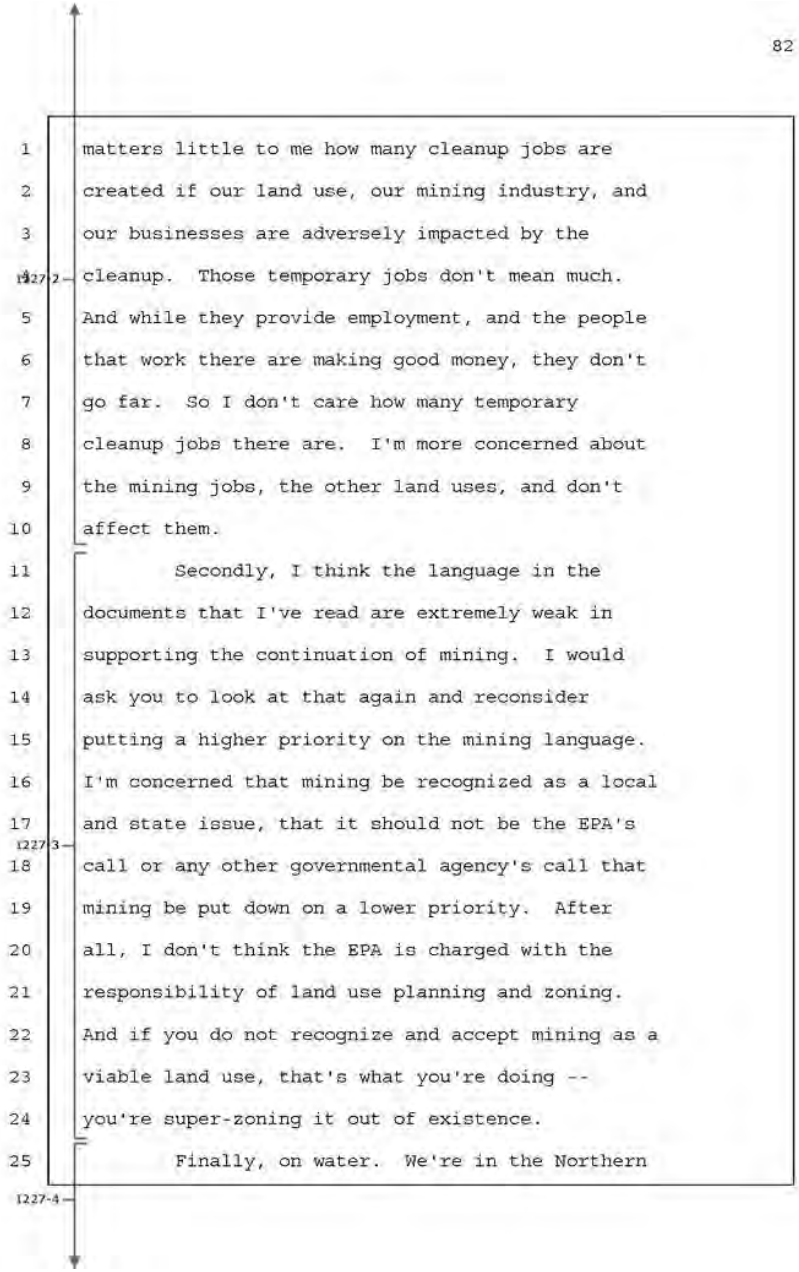
My comments on this is the concern I have of the impact of the remedy to us. Frankly, it

Response to comment I227-1

See response to Comment No. I54-6.

Response to comment I227-2

See response to Comment Nos. I58-5, LC32-2, and I54-2.



82

matters little to me how many cleanup jobs are created if our land use, our mining industry, and our businesses are adversely impacted by the cleanup. Those temporary jobs don't mean much. And while they provide employment, and the people that work there are making good money, they don't go far. So I don't care how many temporary cleanup jobs there are. I'm more concerned about the mining jobs, the other land uses, and don't affect them.

I227-2

Secondly, I think the language in the documents that I've read are extremely weak in supporting the continuation of mining. I would ask you to look at that again and reconsider putting a higher priority on the mining language. I'm concerned that mining be recognized as a local and state issue, that it should not be the EPA's call or any other governmental agency's call that mining be put down on a lower priority. After all, I don't think the EPA is charged with the responsibility of land use planning and zoning. And if you do not recognize and accept mining as a viable land use, that's what you're doing -- you're super-zoning it out of existence.

I227-3

Finally, on water. We're in the Northern

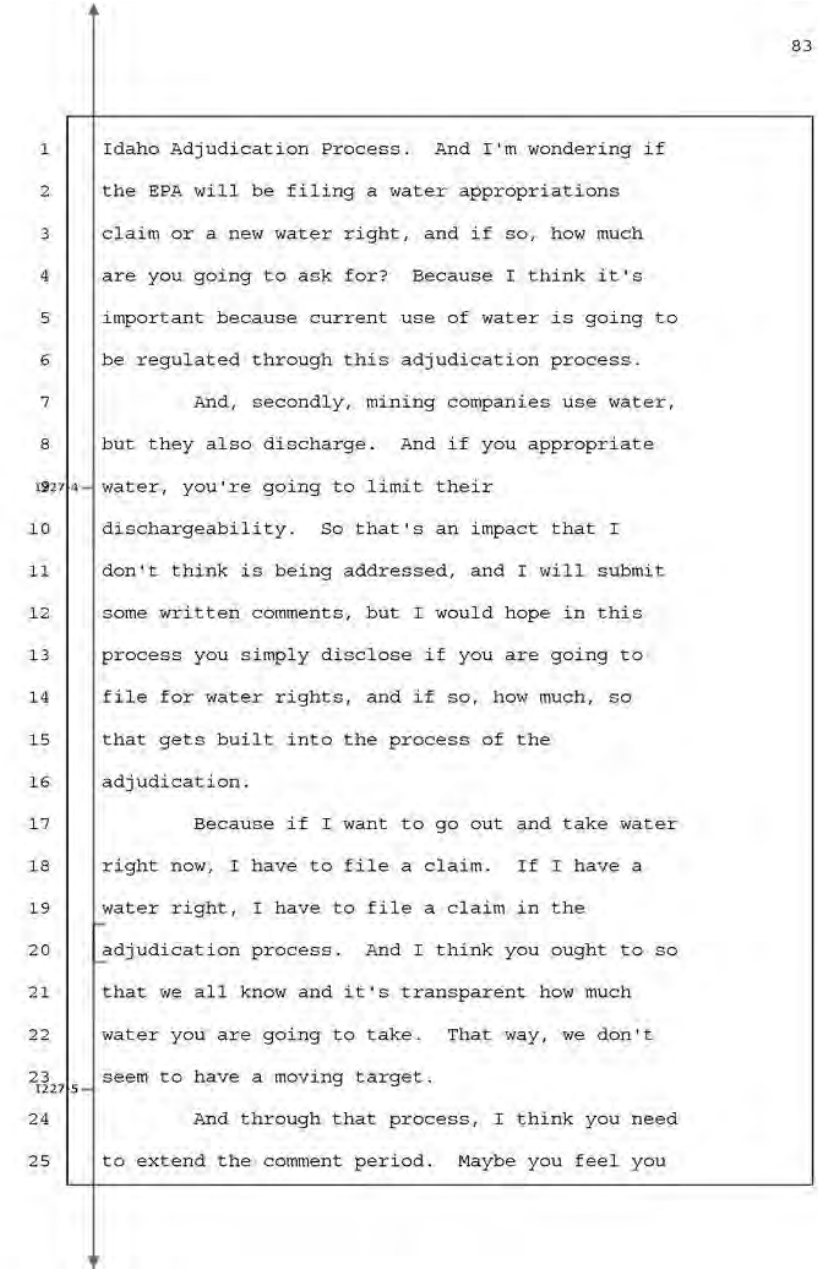
I227-4

Response to comment I227-3

See response to Comment No. I58-5.

Response to comment I227-4

EPA is not yet required to participate in the adjudication since any permit application EPA may submit would be filed after November 12, 2008, the cut-off date for requiring participation in the adjudication. EPA does not believe that its collections and treatment of contaminated water will impair a mining company's ability to discharge water generated through its operations, however such discharge is likely subject to the Clean Water Act. See response to Comment No. SA4-12 and the ROD Amendment Part 3, Section 3.7.4.



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Idaho Adjudication Process. And I'm wondering if the EPA will be filing a water appropriations claim or a new water right, and if so, how much are you going to ask for? Because I think it's important because current use of water is going to be regulated through this adjudication process.

And, secondly, mining companies use water, but they also discharge. And if you appropriate water, you're going to limit their dischargeability. So that's an impact that I don't think is being addressed, and I will submit some written comments, but I would hope in this process you simply disclose if you are going to file for water rights, and if so, how much, so that gets built into the process of the adjudication.

I227-4

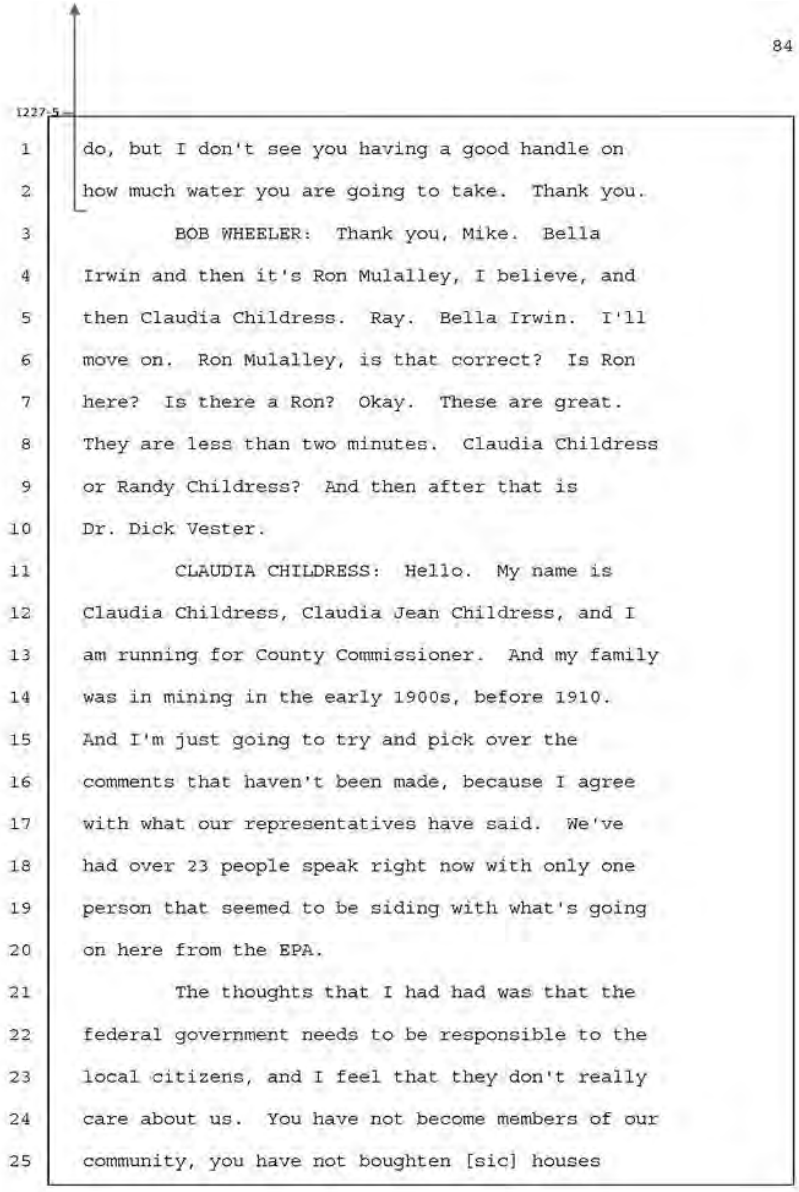
Because if I want to go out and take water right now, I have to file a claim. If I have a water right, I have to file a claim in the adjudication process. And I think you ought to so that we all know and it's transparent how much water you are going to take. That way, we don't seem to have a moving target.

I227-5

And through that process, I think you need to extend the comment period. Maybe you feel you

Response to comment I227-5

See responses to Comment Nos. I54-8 and I54-6.



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1227.5

do, but I don't see you having a good handle on how much water you are going to take. Thank you.

BOB WHEELER: Thank you, Mike. Bella Irwin and then it's Ron Mulalley, I believe, and then Claudia Childress. Ray. Bella Irwin. I'll move on. Ron Mulalley, is that correct? Is Ron here? Is there a Ron? Okay. These are great. They are less than two minutes. Claudia Childress or Randy Childress? And then after that is Dr. Dick Vester.

CLAUDIA CHILDRESS: Hello. My name is Claudia Childress, Claudia Jean Childress, and I am running for County Commissioner. And my family was in mining in the early 1900s, before 1910. And I'm just going to try and pick over the comments that haven't been made, because I agree with what our representatives have said. We've had over 23 people speak right now with only one person that seemed to be siding with what's going on here from the EPA.

The thoughts that I had had was that the federal government needs to be responsible to the local citizens, and I feel that they don't really care about us. You have not become members of our community, you have not boughten [sic] houses

No comments

Brand, Nathan, I542, Letter 617284

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
nathanthestout@gmail.com To: formsubmission 11/18/2010 08:05 PM
Sent by: Nathanthestout@Gmail.Com <nathanthestout=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Nathan Brand
Date: 11/18/2010
Brief Overview: The plan the EPA has proposed for the Upper Coeur d'Alene River Basin does not realistically address the problem(s) it is purported to solve.
I542-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley, or an alternative plan yet to be proposed by an organized group of local citizens.
Coeur d'Alene Basin Resident: No
Email Address: nathanthestout@gmail.com
Mailing Address: 6218 S. Wildman Lane|Coeur d'Alene|Idaho|83814|US
Phone Number:

617284

Response to comment I542-1

See response to Comment No. I351-1.

Brand, Paul, I541, Letter 617283

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
paul@khouse.org to: formsubmission 11/18/2010 08:15 PM
Sent by: Paul@Khouse.Org <paul=khouse.org

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Paul Brand
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximstely $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I541-1 First, I think any plan must be subject to review for a shorter period of time – say 10 years at the most. Second, I think the plan looks at far too many former mine sites. Many of these old sites are better left as they are now I541-2 not disturbed by the remediation. Third, I believe the local community should have the final say in coordinating any kind of plan that is implemented.

I541-3 Shoshone County has petitioned the EPA for coordination status and wants to use its comprehensive plan. I think the current EPA plan must be evaluated in regard to how that fits with the Shoshone County plan.

My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed

I541-4 through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I541-5 I also think that local cities and communities must be involved in a real solution. Let local people help solve local problems.
Coeur d'Alene Basin Resident: No
Email Address: paul@khouse.org
Mailing Address: 6218 S Wildman Lane|Coeur d'Alene|ID|83814|US
Phone Number: (208) 667-3331

617283

Response to comment I541-1
See response to Comment No. I58-1.

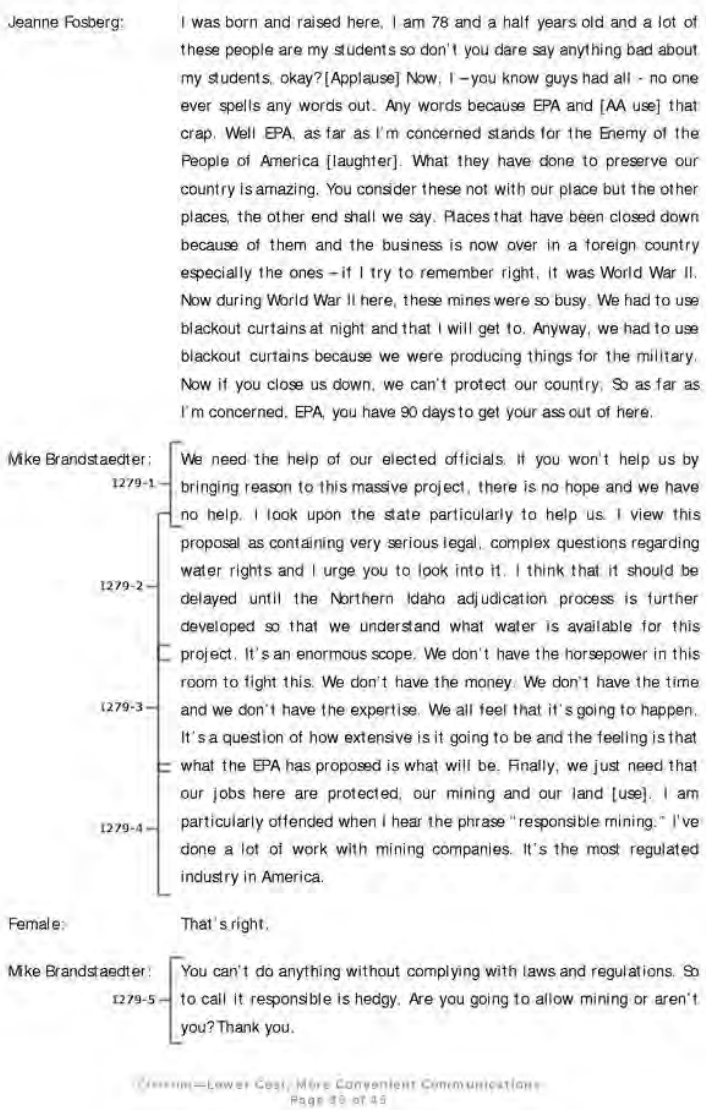
Response to comment I541-2
See response to Comment No. I822-14.

Response to comment I541-3
See responses to Comment Nos. I295-2 and LJ39-5.

Response to comment I541-4
See response to Comment No. I351-1.

Response to comment I541-5
See response to Comment No. I295-2 and the ROD Amendment Part 2, Section 3.0 regarding EPA's efforts to involve the community in the decisionmaking process.

Brandstaedter, Mike, I279, Letter 616015-43



Jeanne Fosberg: I was born and raised here. I am 78 and a half years old and a lot of these people are my students so don't you dare say anything bad about my students, okay? [Applause] Now, I – you know guys had all - no one ever spells any words out. Any words because EPA and [AA use] that crap. Well EPA, as far as I'm concerned stands for the Enemy of the People of America [laughter]. What they have done to preserve our country is amazing. You consider these not with our place but the other places, the other end shall we say. Places that have been closed down because of them and the business is now over in a foreign country especially the ones – if I try to remember right, it was World War II. Now during World War II here, these mines were so busy. We had to use blackout curtains at night and that I will get to. Anyway, we had to use blackout curtains because we were producing things for the military. Now if you close us down, we can't protect our country. So as far as I'm concerned, EPA, you have 90 days to get your ass out of here.

Mike Brandstaedter: We need the help of our elected officials. If you won't help us by bringing reason to this massive project, there is no hope and we have no help. I look upon the state particularly to help us. I view this proposal as containing very serious legal, complex questions regarding water rights and I urge you to look into it. I think that it should be delayed until the Northern Idaho adjudication process is further developed so that we understand what water is available for this project. It's an enormous scope. We don't have the horsepower in this room to fight this. We don't have the money. We don't have the time and we don't have the expertise. We all feel that it's going to happen. It's a question of how extensive is it going to be and the feeling is that what the EPA has proposed is what will be. Finally, we just need that our jobs here are protected, our mining and our land [use]. I am particularly offended when I hear the phrase "responsible mining." I've done a lot of work with mining companies. It's the most regulated industry in America.

I279-1 I279-2 I279-3 I279-4

Female: That's right.

Mike Brandstaedter: You can't do anything without complying with laws and regulations. So to call it responsible is hedgy. Are you going to allow mining or aren't you? Thank you.

I279-5

[illegible]—Lower Cost, More Convenient Communications
Page 39 of 45

Response to comment I279-1
Comment noted.

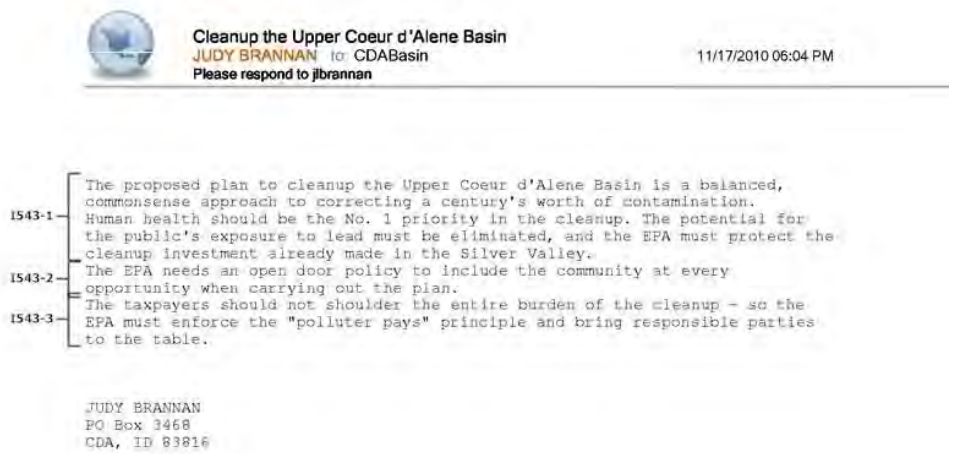
Response to comment I279-2
See response to Comment No. SA4-12 and the ROD Amendment Part 3, Section 3.7.4.

Response to comment I279-3
See responses to Comment Nos. I58-1 and I295-3.

Response to comment I279-4
See response to Comment No. I58-5.

Response to comment I279-5
See response to Comment No. I58-5.

Brannan, Judy, I543, Letter 617285



Cleanup the Upper Coeur d'Alene Basin
JUDY BRANNAN to: CDABasin 11/17/2010 06:04 PM
Please respond to jlbrannan

I543-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I543-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I543-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

JUDY BRANNAN
PO Box 3468
CDA, ID 83816

617285

Response to comment I543-1

See response to Comment No. I295-1.

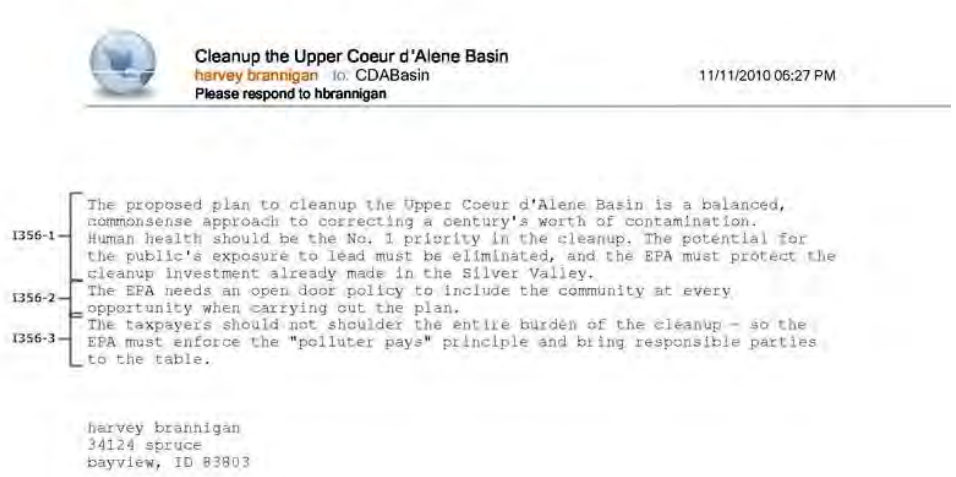
Response to comment I543-2

See response to Comment No. I295-2.

Response to comment I543-3

See response to Comment No. I295-3.

Brannigan, Harvey, I356, Letter 616241



Cleanup the Upper Coeur d'Alene Basin
harvey brannigan to: CDABasin 11/11/2010 06:27 PM
Please respond to hbrannigan

I356-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I356-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I356-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

harvey brannigan
34124 spruce
bayview, ID 83803

616241

Response to comment I356-1

See response to Comment No. I295-1.

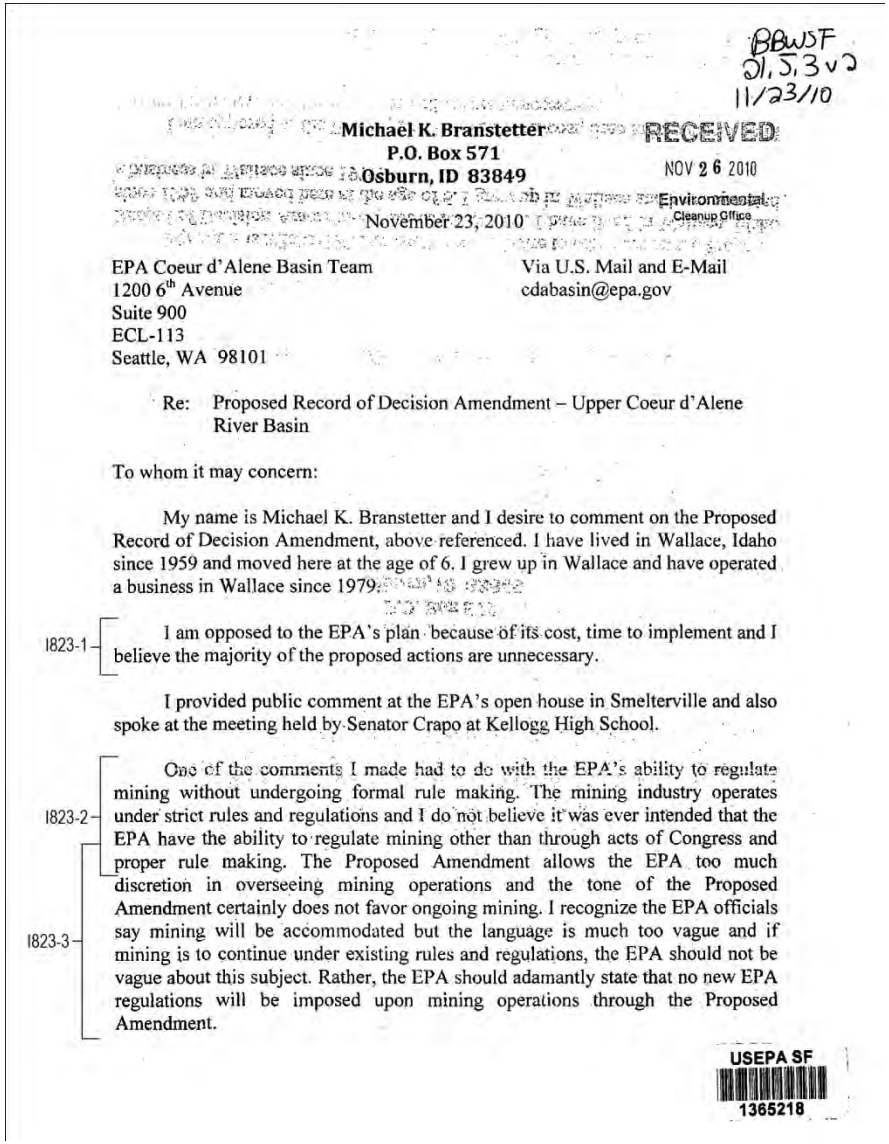
Response to comment I356-2

See response to Comment No. I295-2.

Response to comment I356-3

See response to Comment No. I295-3.

Branstetter, Michael , I823, Letter 1365218



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11/23/10

Michael K. Branstetter
P.O. Box 571
Osburn, ID 83849

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Environmental
Cleanup Office

November 23, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

Via U.S. Mail and E-Mail
cdabasin@epa.gov

Re: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To whom it may concern:

My name is Michael K. Branstetter and I desire to comment on the Proposed Record of Decision Amendment, above referenced. I have lived in Wallace, Idaho since 1959 and moved here at the age of 6. I grew up in Wallace and have operated a business in Wallace since 1979.

I823-1 I am opposed to the EPA's plan because of its cost, time to implement and I believe the majority of the proposed actions are unnecessary.

I provided public comment at the EPA's open house in Smelterville and also spoke at the meeting held by Senator Crapo at Kellogg High School.

I823-2 One of the comments I made had to do with the EPA's ability to regulate mining without undergoing formal rule making. The mining industry operates under strict rules and regulations and I do not believe it was ever intended that the EPA have the ability to regulate mining other than through acts of Congress and proper rule making. The Proposed Amendment allows the EPA too much discretion in overseeing mining operations and the tone of the Proposed Amendment certainly does not favor ongoing mining. I recognize the EPA officials say mining will be accommodated but the language is much too vague and if mining is to continue under existing rules and regulations, the EPA should not be vague about this subject. Rather, the EPA should adamantly state that no new EPA regulations will be imposed upon mining operations through the Proposed Amendment.

I823-3

USEPA SF
1365218

Response to comment I823-1

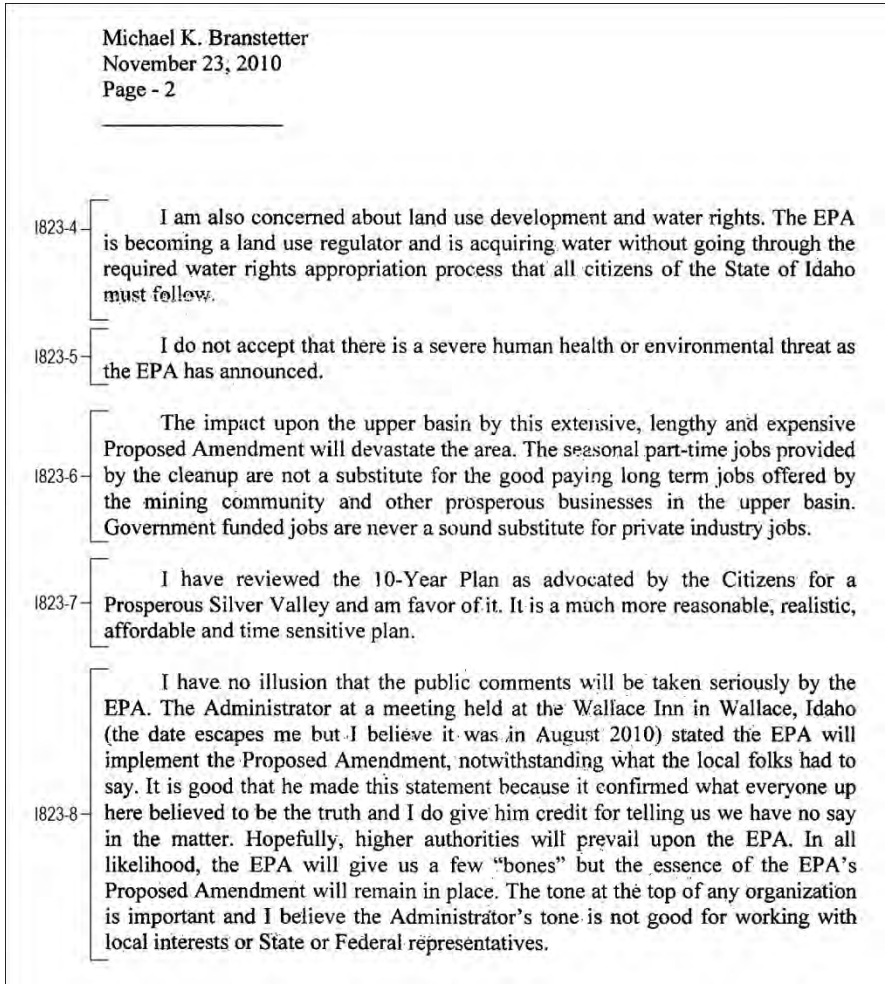
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I823-2

The Selected Remedy does not regulate mining. In addition, see response to Comment No. I58-5.

Response to comment I823-3

See response to Comment No. I58-5.



Michael K. Branstetter
November 23, 2010
Page - 2

I823-4 I am also concerned about land use development and water rights. The EPA is becoming a land use regulator and is acquiring water without going through the required water rights appropriation process that all citizens of the State of Idaho must follow.

I823-5 I do not accept that there is a severe human health or environmental threat as the EPA has announced.

I823-6 The impact upon the upper basin by this extensive, lengthy and expensive Proposed Amendment will devastate the area. The seasonal part-time jobs provided by the cleanup are not a substitute for the good paying long term jobs offered by the mining community and other prosperous businesses in the upper basin. Government funded jobs are never a sound substitute for private industry jobs.

I823-7 I have reviewed the 10-Year Plan as advocated by the Citizens for a Prosperous Silver Valley and am favor of it. It is a much more reasonable, realistic, affordable and time sensitive plan.

I823-8 I have no illusion that the public comments will be taken seriously by the EPA. The Administrator at a meeting held at the Wallace Inn in Wallace, Idaho (the date escapes me but I believe it was in August 2010) stated the EPA will implement the Proposed Amendment, notwithstanding what the local folks had to say. It is good that he made this statement because it confirmed what everyone up here believed to be the truth and I do give him credit for telling us we have no say in the matter. Hopefully, higher authorities will prevail upon the EPA. In all likelihood, the EPA will give us a few "bones" but the essence of the EPA's Proposed Amendment will remain in place. The tone at the top of any organization is important and I believe the Administrator's tone is not good for working with local interests or State or Federal representatives.

Response to comment I823-4

EPA intends to implement remedial actions selected for ground and surface in compliance with CERCLA as well state and federal water law. See responses to Comment Nos. I54-2 and SA4-12; and the ROD Amendment Part 3, Section 3.7.4.

Response to comment I823-5

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to addressing these unacceptable risks.

Response to comment I823-6

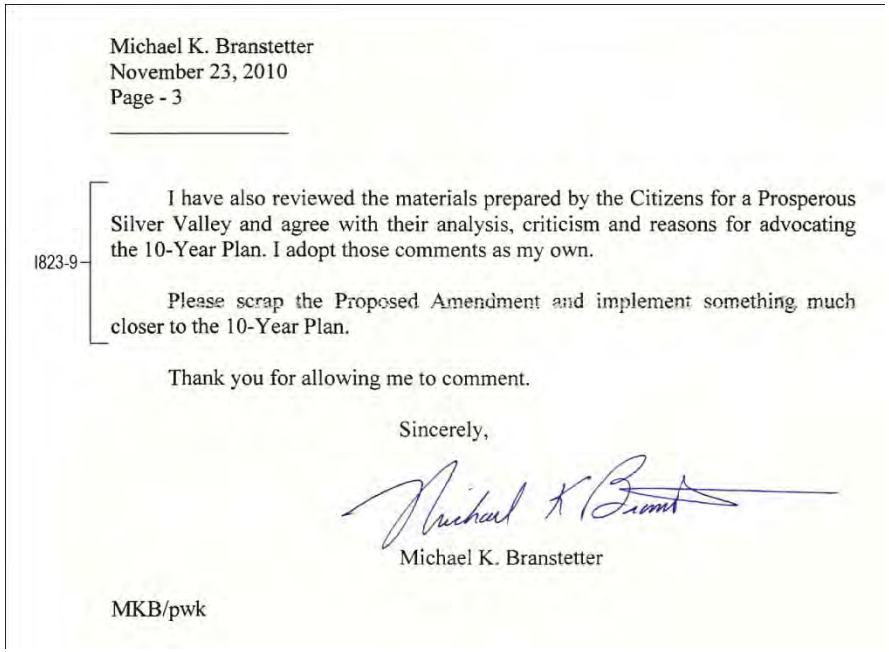
See responses to Comment Nos. I54-2 and I58-5.

Response to comment I823-7

See response to Comment No. I474-2.

Response to comment I823-8

See response to Comment No. I295-2.



Michael K. Branstetter
November 23, 2010
Page - 3

I823-9 I have also reviewed the materials prepared by the Citizens for a Prosperous Silver Valley and agree with their analysis, criticism and reasons for advocating the 10-Year Plan. I adopt those comments as my own.

Please scrap the Proposed Amendment and implement something much closer to the 10-Year Plan.

Thank you for allowing me to comment.

Sincerely,

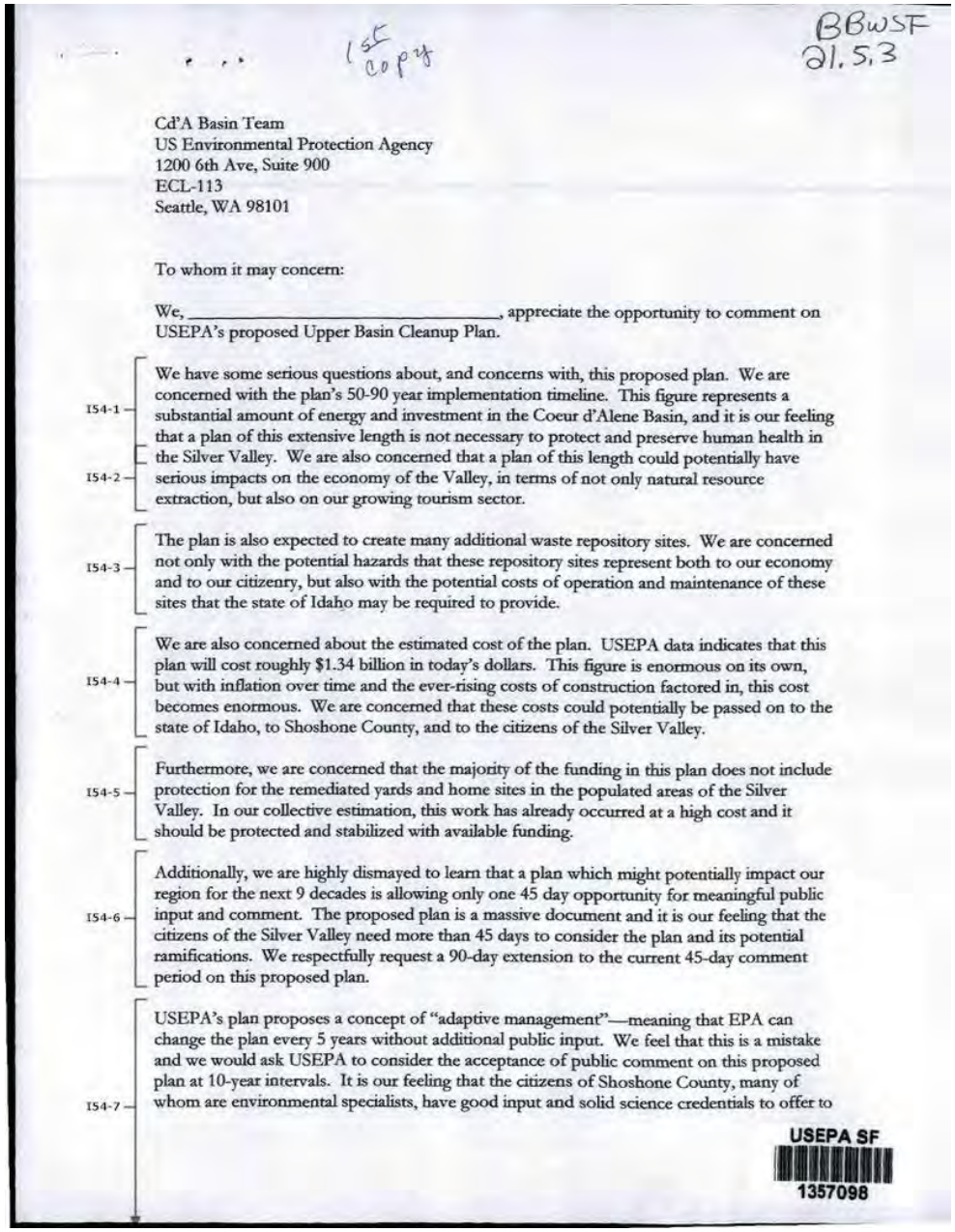
Michael K. Branstetter

MKB/pwk

Response to comment I823-9

See response to Comment No. I474-2.

Branstetter, Joann, I54, Letter 1357098



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BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

We, _____, appreciate the opportunity to comment on USEPA's proposed Upper Basin Cleanup Plan.

I54-1 We have some serious questions about, and concerns with, this proposed plan. We are concerned with the plan's 50-90 year implementation timeline. This figure represents a substantial amount of energy and investment in the Coeur d'Alene Basin, and it is our feeling that a plan of this extensive length is not necessary to protect and preserve human health in the Silver Valley.

I54-2 We are also concerned that a plan of this length could potentially have serious impacts on the economy of the Valley, in terms of not only natural resource extraction, but also on our growing tourism sector.

I54-3 The plan is also expected to create many additional waste repository sites. We are concerned not only with the potential hazards that these repository sites represent both to our economy and to our citizenry, but also with the potential costs of operation and maintenance of these sites that the state of Idaho may be required to provide.

I54-4 We are also concerned about the estimated cost of the plan. USEPA data indicates that this plan will cost roughly $1.34 billion in today's dollars. This figure is enormous on its own, but with inflation over time and the ever-rising costs of construction factored in, this cost becomes enormous. We are concerned that these costs could potentially be passed on to the state of Idaho, to Shoshone County, and to the citizens of the Silver Valley.

I54-5 Furthermore, we are concerned that the majority of the funding in this plan does not include protection for the remediated yards and home sites in the populated areas of the Silver Valley. In our collective estimation, this work has already occurred at a high cost and it should be protected and stabilized with available funding.

I54-6 Additionally, we are highly dismayed to learn that a plan which might potentially impact our region for the next 9 decades is allowing only one 45 day opportunity for meaningful public input and comment. The proposed plan is a massive document and it is our feeling that the citizens of the Silver Valley need more than 45 days to consider the plan and its potential ramifications. We respectfully request a 90-day extension to the current 45-day comment period on this proposed plan.

I54-7 USEPA's plan proposes a concept of "adaptive management"—meaning that EPA can change the plan every 5 years without additional public input. We feel that this is a mistake and we would ask USEPA to consider the acceptance of public comment on this proposed plan at 10-year intervals. It is our feeling that the citizens of Shoshone County, many of whom are environmental specialists, have good input and solid science credentials to offer to

USEPA SF
1357098

Response to comment I54-1

See response to Comment No. I58-1.

Response to comment I54-2

EPA believes that the cleanup will benefit the local economy in a variety of ways. The Selected Remedy will boost economic growth by significantly improving the environment for residents and tourists, creating jobs with the money that will be spent on the Upper Basin cleanup, and providing opportunities for formerly contaminated land to be redeveloped. Retail development in Smelterville, the Galena Ridge golf community, and the Trail of the Coeur d'Alenes are examples of the types of redevelopment that can occur on remediated properties.

Since 1985, millions of dollars have been spent on cleanup, primarily for yard remediation and cleanup in the Upper Basin, including the Bunker Hill Box. Significant spending will continue for the cleanup actions in the Upper Basin. EPA encourages the hiring of local businesses and workforce for the cleanup work. To that end EPA is providing training opportunities, through the Superfund Job Training Initiative, for local citizens in order to successfully compete for these jobs.

Cleanup of additional properties in the Silver Valley will provide opportunities for development that do not currently exist. EPA is committed to working with the mining industry and all Silver Valley businesses and landowners to conduct the cleanup in ways that are consistent with the current and future land uses desired by the community

Response to comment I54-3

The Selected Remedy does call for significant excavation and consolidation of contaminated materials in either engineered repositories or "waste consolidation areas". For the purposes of the Selected Remedy, repositories are considered to be large, centrally located areas within the Upper Basin where contaminated soil excavated during cleanup actions is transported to, managed, and secured. EPA's preference will be to locate repositories in areas that are already contaminated; such as on top of historical mine tailings piles. The Big

Creek Repository, Page Repository, Osburn Tailings Ponds, and Star Ponds are examples of former tailings impoundments that either have been or could be turned into cleanup repositories. Repositories help protect people and the environment by dramatically decreasing the chance that people and wildlife will

be exposed to metals-contaminated soil, sediments, and debris. Without repositories, cleanup cannot proceed and the public will continue to be exposed to high metals levels. Repositories constructed under the Selected Remedy will be engineered to securely contain waste materials, which will prevent contaminants from being released to surface water, groundwater, or air at concentrations above State and/or federal standards.

Waste consolidation areas will differ from the centrally located repositories. Waste consolidation areas will be established within tributary watersheds (e.g., the Ninemile and Canyon Creek Watersheds) in areas where significant volumes of waste are already present from historical mine and mill site operations. Rather than haul these wastes out of the watershed to a regional repository, EPA's first step will be to look for locations to safely consolidate and cap wastes at the particular mine and mill site being cleaned up or in another area of the watershed where the consolidated waste can be better protected from surface water runoff and erosion. This approach will significantly reduce the number of haul trucks driving through communities such as Woodland Park, Wallace, and Mullan. The approach has already been used successfully in the Upper Basin and, as a result, the volume of soil hauled to repositories has been minimized. Good examples of the successful use of waste consolidation areas include the Moon Creek Watershed and the Golconda Mine near Wallace. Pre-design investigation work has also led to the identification of a location for a waste consolidation area in the East Fork of Ninemile Creek drainage. Based on this new information, select cleanup methods for sites in the Ninemile drainage have been modified to optimize the use of this local waste consolidation area and eliminate the need for regional repository space for these materials.

EPA, IDEQ, and the Basin Commission are working together to identify locations for new repositories in the Upper Basin. There are many opportunities for community involvement in repository siting. To learn more, please contact Don Carpenter, IDEQ, at 208-373-0141 or Ed Moreen, EPA, at 208-664-4588, or visit: http://basincommission.com/TLG_PFT_Repository.asp.

Response to comment I54-4

See response to Comment No. I58-2.

Response to comment I54-5

The Selected Remedy includes remedy protection actions to protect remediated properties from SFCDR tributary stormwater runoff. These actions will help protect areas that have been cleaned up—i.e., keep clean areas clean, which is a common sense goal. Remedy protection includes actions such as local drainage controls to ensure that clean gravel or soil barriers are not washed away or recontaminated during heavy rain or snow events or by tributary flooding.

To date, EPA has addressed these types of issues on a site-by-site and as-needed basis. In some instances, recontaminated barriers have been replaced by new clean barriers. This approach may have been acceptable in the short term, but it is not proactive in addressing recontamination concerns. EPA recognizes that it is better to be more systematic about these types of recontamination problems. By being proactive EPA intends to reduce the chance that clean barriers will be recontaminated. Based on hydraulic analyses, field experience over the last 15 years, and input from local public works and elected officials, EPA and IDEQ have identified areas most likely to be recontaminated by tributary flooding or heavy rain or snowfall. Basin-wide flooding issues (including SFCDR flooding) are not addressed in this ROD Amendment.

EPA worked collaboratively with IDEQ to develop and evaluate remedy protection alternatives in the Focused Feasibility Study (FFS). The Selected Remedy includes specific mitigation actions (referred to as remedy protection projects) within the primary Upper Basin communities (Pinehurst, Smelterville, Kellogg, Wardner, Osburn, Silverton, Wallace, and Mullan) to protect existing Selected Human Health Remedies at risk from recontamination. The remedy protection projects include drainage controls such as replacing culverts, improving channel capacity, controlling erosion, and other actions to reduce the risks posed to the existing remedies. In addition to the eight primary communities, the Selected Remedy anticipates additional remedy protection work in the Upper Basin side gulches (defined as drainage areas outside the primary communities). Remedy protection projects in the side gulches will be

similar to work selected for the primary communities and will be described in future decision documents as appropriate.

Response to comment I54-6

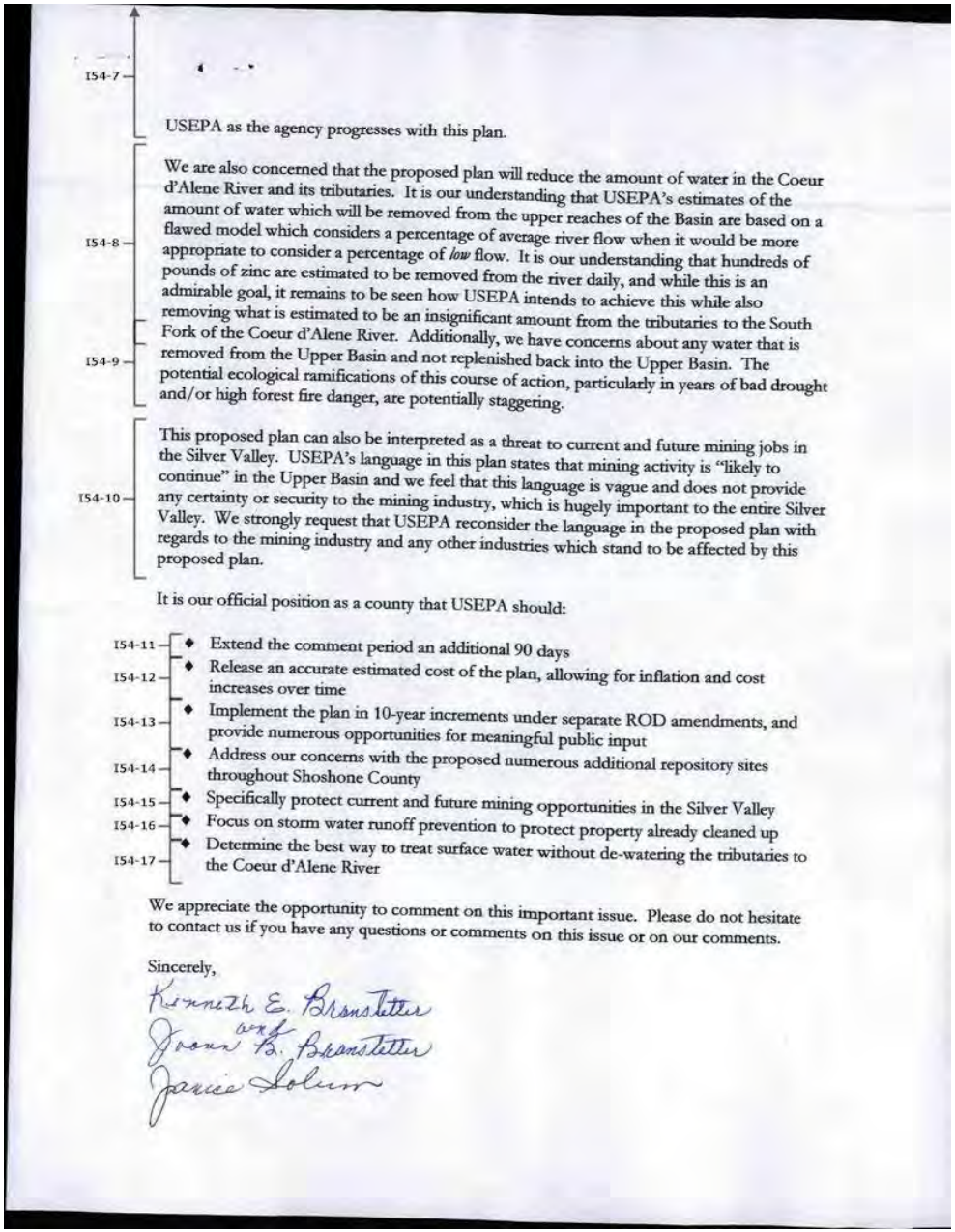
Based on requests from the public after the Proposed Plan was issued, the comment period was extended 90 additional days, for a total of 135 days for public and stakeholder comment on both the Proposal Plan and the Draft Final FFS Report.

Response to comment I54-7

Adaptive management does not mean that EPA can change the Selected Remedy without meaningful public participation. In fact, if EPA determines in the future that significant or fundamental changes to the remedy are necessary, then EPA is legally obligated by CERCLA to address these changes through an Explanation of Significant Differences or another ROD Amendment, respectively. Within the context of the Selected Remedy, adaptive management simply means that EPA will implement specific cleanup actions included in the remedy, monitor the effectiveness of those actions to determine whether cleanup goals are being achieved, and make adjustments to future cleanup actions to benefit from the information gained through the effectiveness monitoring. If these adjustments require significant or fundamental changes to the Selected Remedy, EPA will prepare a new appropriate decision document. In such circumstances, consistent with the requirements of Section 113(k) of CERCLA and 40 CFR Section 300.435(c), EPA will provide opportunities for public participation. Depending on the significance of the changes in cleanup approach, there may be additional opportunities for public input. Adaptive management does not relieve EPA of its obligations under law and policy, or of its commitment to work with the affected communities.

Adaptive management is a critical component of the Selected Remedy because it is not possible for physical and chemical conditions to be fully defined and known for this large and complex area. Uncertainty is unavoidable, and the Selected Remedy must be managed and put into action taking this uncertainty into account. An adaptive management framework provides a methodology to carry out the Selected Remedy in a structured, iterative way. Adaptive management considers uncertainty, monitors and evaluates the effectiveness of the remedial actions and cleanup technologies, and then incorporates the "lessons learned" such that uncertainty is reduced for future actions as the cleanup work progresses towards achievement of the overall cleanup goals, called remedial action objectives (RAOs). The adaptive management process will provide valuable information to prioritize cleanup actions so the greatest amount of effective cleanup is achieved for the lowest cost. EPA previously identified the need to adaptively manage cleanup activities in the Coeur d'Alene Basin in the ROD for OU 3 (EPA, 2002; www.epa.gov/superfund/sites/rods/fulltext/r1002032.pdf) and through the phased approach used to implement the remedy for non-populated areas of the Bunker Hill Box (OU 2) following bankruptcy of the potentially responsible party. In addition, the NAS agreed with EPA's decision documented in the 2002 ROD to perform the cleanup through the "establishment of a rigorous adaptive management process" for the planning, implementation, and management of environmental cleanup activities at the Bunker Hill Superfund Site (National Academy of Sciences, 2005, http://www.epa.gov/superfund/accomp/coeur/). EPA is committed to using an adaptive management framework to manage and carry out the Selected Remedy for the Upper Basin, in accordance with its previous decision documents and the recommendations of the NAS.

The replanting of the OU 2 hillsides that surround the historical Lead Smelter and Zinc Plant is a highly visible and successful example of adaptive management at the Site. Several earlier attempts to revegetate the hillsides failed because the high degree of associated uncertainty was neither understood nor addressed. Uncertainty existed with respect to the causes of prior failures, the levels of contamination, and the planting conditions and species that would have the greatest chance of survival and natural regeneration. To develop a successful planting program, EPA conducted studies of several small-scale test plots on the hillsides. These studies evaluated specific areas of uncertainty such as hillside slopes, contaminant levels, varying fertilizers and seed-tackifiers, and different grass, shrub, and tree species. The test plots were monitored over two growth seasons, and the lessons learned enabled EPA to develop a variety of "recipes" for revegetating the hillsides. The hillside replanting was ultimately a great success, as rocky, bare slopes were transformed into a healthy, green, sustainable ecosystem.



I54-7

USEPA as the agency progresses with this plan.

We are also concerned that the proposed plan will reduce the amount of water in the Coeur d'Alene River and its tributaries. It is our understanding that USEPA's estimates of the amount of water which will be removed from the upper reaches of the Basin are based on a flawed model which considers a percentage of average river flow when it would be more appropriate to consider a percentage of *low* flow. It is our understanding that hundreds of pounds of zinc are estimated to be removed from the river daily, and while this is an admirable goal, it remains to be seen how USEPA intends to achieve this while also removing what is estimated to be an insignificant amount from the tributaries to the South Fork of the Coeur d'Alene River. Additionally, we have concerns about any water that is removed from the Upper Basin and not replenished back into the Upper Basin. The potential ecological ramifications of this course of action, particularly in years of bad drought and/or high forest fire danger, are potentially staggering.

I54-8

I54-9

This proposed plan can also be interpreted as a threat to current and future mining jobs in the Silver Valley. USEPA's language in this plan states that mining activity is "likely to continue" in the Upper Basin and we feel that this language is vague and does not provide any certainty or security to the mining industry, which is hugely important to the entire Silver Valley. We strongly request that USEPA reconsider the language in the proposed plan with regards to the mining industry and any other industries which stand to be affected by this proposed plan.

I54-10

It is our official position as a county that USEPA should:

- I54-11 Extend the comment period an additional 90 days
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- I54-13 Implement the plan in 10-year increments under separate ROD amendments, and provide numerous opportunities for meaningful public input
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- I54-15 Specifically protect current and future mining opportunities in the Silver Valley
- I54-16 Focus on storm water runoff prevention to protect property already cleaned up
- I54-17 Determine the best way to treat surface water without de-watering the tributaries to the Coeur d'Alene River

We appreciate the opportunity to comment on this important issue. Please do not hesitate to contact us if you have any questions or comments on this issue or on our comments.

Sincerely,

Kenneth E. Branstetter

Joann B. Branstetter

Janice Solum

Response to comment I54-8

Collection of contaminated groundwater for treatment will reduce surface water flows in Canyon Creek and the SFCDR, but not significantly. EPA has modeled these reductions during low-flow and average-flow conditions. The modeling estimates that the maximum stream flow reductions in Canyon Creek and the SFCDR during extreme low-flow conditions would be about 10 percent and 16 percent, respectively. To put this in perspective, in a "typical" year, dry season flow rates, as represented by flows in the 10 percentile, have been shown to fluctuate by 21 percent on average over the period of record. Therefore, a fluctuation of 16 percent is within the range of average natural low flow fluctuation from year to year. Under average-flow conditions, the reductions are estimated to only be about 1 percent in Canyon Creek and 5 percent in the SFCDR. Further, this reduction will only occur for a small stretch of river between the collection points in Osburn and Canyon Creek and Kellogg, where the same volume of clean treated water will be returned to the SFCDR. EPA has estimated this expected stream flow reduction using the Basin-wide groundwater model and historical stream flow monitoring data collected by the U.S. Geological Service (see the Final FFS Report [EPA, 2012] for documentation of these analyses). Before conducting any water treatment project, EPA will perform additional study and remedial design to ensure that stream flows are not reduced to a point that will have negative effects on water rights holders or aquatic life. During and after remedy implementation, stream flows and collected flow rates will be monitored. Water collected for treatment will include both contaminated groundwater and adit discharges. Surface water will not be collected directly from tributaries and the SFCDR.

Problems from stream flow reduction are not expected but, if any were to occur, collection rates could be modified to minimize or eliminate any problems. In addition, adit discharges currently slated for treatment at the CTP could be treated onsite using semi-passive technologies. Semi-passive treatment approaches that may be applied include *ex situ* chemical or biological treatment. *In situ* treatment approaches were considered in the FFS and may be evaluated further for application at specific sites. Following treatment at the CTP, the same volume of clean water will return to the SFCDR at Kellogg, albeit downstream

from onsite treatment locations. Onsite treatment of the adit discharges involves smaller, semi-passive systems and returns the collected water back to the water body from which it came, resulting in no net reduction in stream flow. The flow

rate of adit discharges to be collected is uncertain at this time. Adit discharge flow rates will be determined during design. Early activities will include the sampling of adit discharge flows under both low- and high-flow conditions to inform planning for future water treatment actions and evaluation of projected stream flow reductions, including adit discharges.

Some comments received during the public comment period have speculated that water treatment will eliminate or greatly reduce water flows. These comments are flawed in that they are based on impossible flow scenarios. For example, maximum groundwater and adit discharge flows, which only take place under high-flow conditions (conditions during peak runoff periods as occur in spring runoff or rain-on-snow events), were compared to the lowest flow conditions, which happen during dry periods like late summer and early fall. This logic is flawed. Peak flows do not occur during the dry season. Therefore, any assessment of stream flow reduction must consider both stream flows and projected groundwater and adit discharge collection under the same flow regime (i.e., comparison of high-flow to high-flow and low-flow to low-flow conditions).

Response to comment I54-9

Stream flow reduction will only occur for a brief stretch of the SFCDR between the collection points in Osburn and Canyon Creeks and Kellogg, where the water will be treated and returned to the river. All groundwater collected for treatment will be treated and discharged in Kellogg. Therefore, water will be replenished within the Upper Basin.

See response to Comment No. I54-8 for additional information regarding the minimal reduction in stream flow expected, even during extreme low-flow periods.

Response to comment I54-10

See response to Comment No. I58-5.

Response to comment I54-11

See response to Comment No. I54-6 above.

Response to comment I54-12

The cost estimate was developed according to CERCLA guidance for the Feasibility Study (FS) process. EPA guidance states that the accuracy of the cost estimates presented in an FS should be within a range of -30 percent to +50 percent , and that a discount rate of 7 percent should be used to estimate total project costs in today's dollars (EPA, 2000, http://yosemite1.epa.gov/EE/EPA/ria.nsf/vwTD/D80FCAF00F14E6A585256A6F004C10B2). According to guidance, this 7 percent discount rate accounts for inflation and the rising costs of construction over time. In estimating the cost of the Selected Remedy in the ROD Amendment, 2009 dollars are the basis for the net present value cost estimate, consistent with cost estimates presented in the FFS Report (EPA, 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). The cost estimate includes the costs of both the remedial actions and operation and maintenance. Cost estimates for work to be performed will be further refined during the remedial design process, and over time as the remedy is implemented.

Response to comment I54-13

See response to Comment No. I58-4.

Response to comment I54-14

See response to Comment No. I54-3 above.

Response to comment I54-15

See response to Comment No. I58-5.

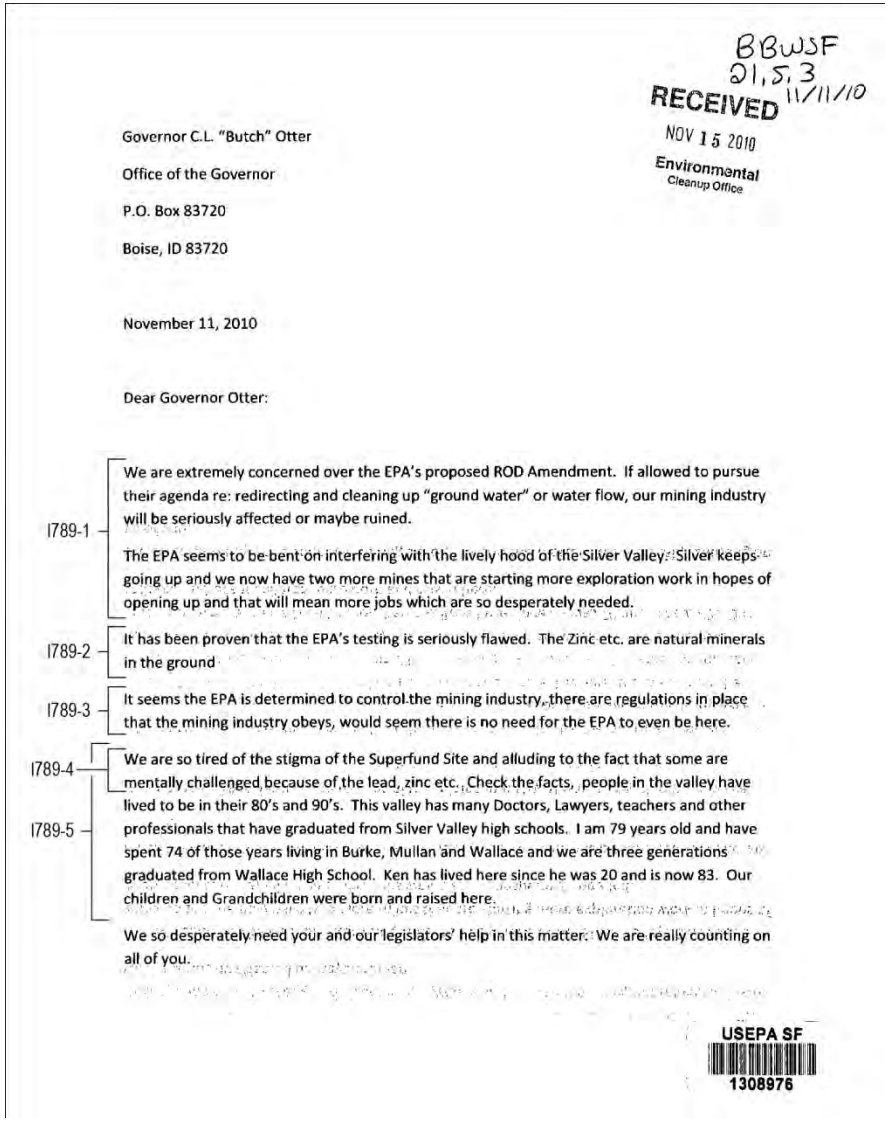
Response to comment I54-16

See response to Comment No. I54-5 above.

Response to comment I54-17

See responses to Comment Nos. I54-8 and I54-9 above.

Branstetter, Joann and Kenneth, I789, Letter 1308976



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RECEIVED
NOV 15 2010
Environmental
Cleanup Office

Governor C.L. "Butch" Otter
Office of the Governor
P.O. Box 83720
Boise, ID 83720

November 11, 2010

Dear Governor Otter:

I789-1 We are extremely concerned over the EPA's proposed ROD Amendment. If allowed to pursue their agenda re: redirecting and cleaning up "ground water" or water flow, our mining industry will be seriously affected or maybe ruined.

The EPA seems to be bent on interfering with the lively hood of the Silver Valley. Silver keeps going up and we now have two more mines that are starting more exploration work in hopes of opening up and that will mean more jobs which are so desperately needed.

I789-2 It has been proven that the EPA's testing is seriously flawed. The Zinc etc. are natural minerals in the ground

I789-3 It seems the EPA is determined to control the mining industry, there are regulations in place that the mining industry obeys, would seem there is no need for the EPA to even be here.

I789-4 We are so tired of the stigma of the Superfund Site and alluding to the fact that some are mentally challenged because of the lead, zinc etc. Check the facts, people in the valley have lived to be in their 80's and 90's. This valley has many Doctors, Lawyers, teachers and other professionals that have graduated from Silver Valley high schools. I am 79 years old and have spent 74 of those years living in Burke, Mullan and Wallace and we are three generations graduated from Wallace High School. Ken has lived here since he was 20 and is now 83. Our children and Grandchildren were born and raised here.

I789-5 We so desperately need your and our legislators' help in this matter. We are really counting on all of you.

USEPA SF
1308976

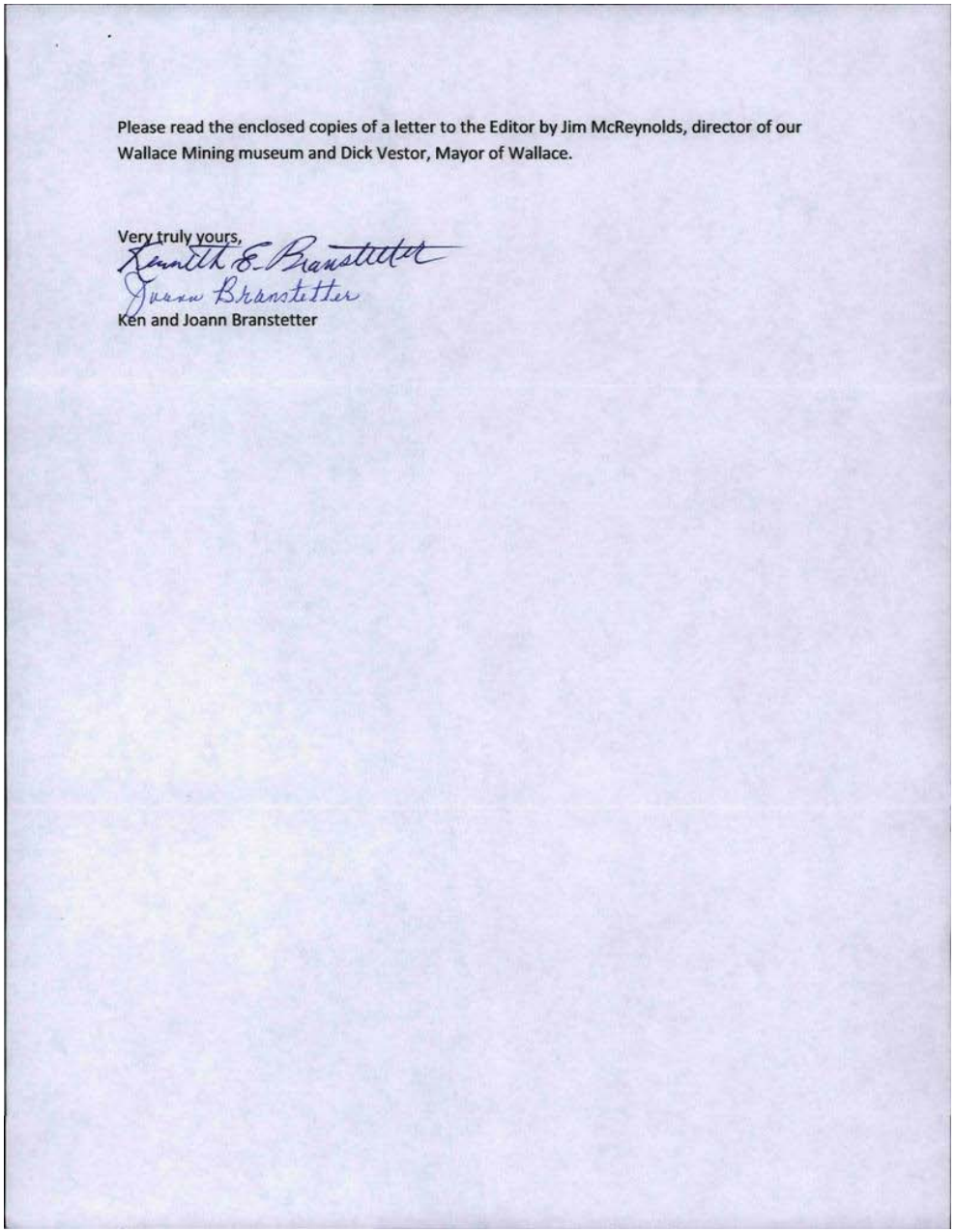
Response to comment I789-1
See response to Comment No. I58-5.

Response to comment I789-2
EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Also see response to Comment No. LC33-8.

Response to comment I789-3
Upper Basin soil, sediments, groundwater, and surface water are contaminated and pose unacceptable risks to human health and the environment. The levels of contamination are well established and are considerably above background levels. Contaminants include lead, zinc, cadmium, arsenic, and other metals. See response to Comment No. LC33-8.

Response to comment I789-4
There are serious risks to human health from heavy metal contamination in the Basin. The risks are well documented. EPA has a regulatory responsibility to address these risks.

Response to comment I789-5
EPA and other agencies have done many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. The primary human health concern in the Upper Basin is excessive lead in the blood of young children and pregnant women. Although risks have been greatly reduced through cleanup activities completed to date, more work is needed to address the continued transport of lead from Upper Basin sources, along the SFCDR floodplain and into Coeur d'Alene Lake. EPA is committed and required by CERCLA to address the remaining unacceptable human health risks in the Upper Basin.



Please read the enclosed copies of a letter to the Editor by Jim McReynolds, director of our Wallace Mining museum and Dick Vestor, Mayor of Wallace.

Very truly yours,
Kenneth E. Branstetter
Joann Branstetter
Ken and Joann Branstetter

No comments

Copies to:
Senator Jim Risch
2 Russell Court Yard
Senate Office Building
Washington DC 20510-1203

Senator Mike Crapo
239 Dirksen Senate Building
Washington DC 20515

Congressman Walt Minnick
1517 Longworth Office Building
Washington DC 20515

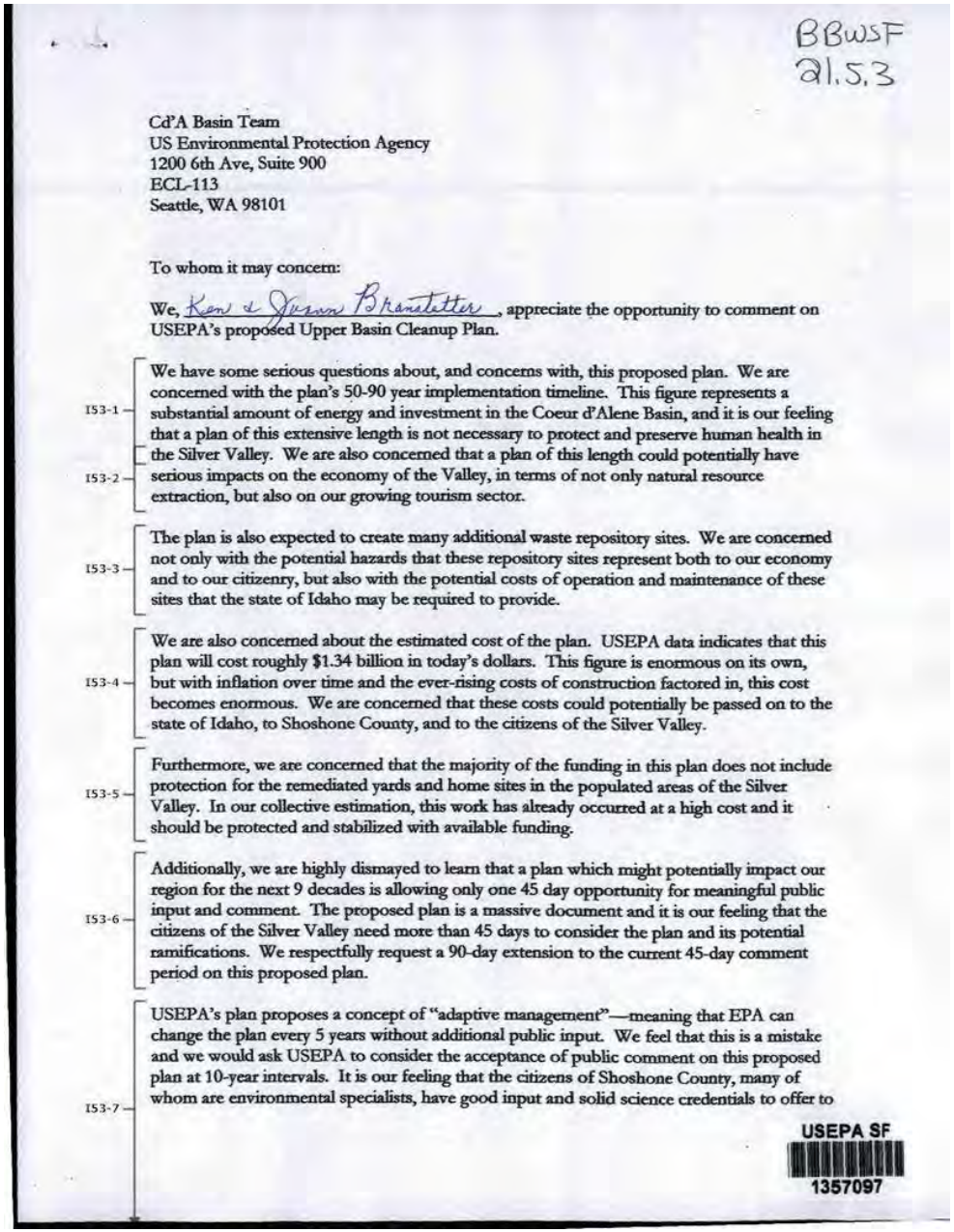
Rep. Mary Lou Shepherd
Idaho State Legislature
P.O. Box 83730
Boise, ID 83720

Rep. Richard "Dick" Harwood
Idaho State Legislature
P.O. Box 83720
Boise, ID 83720

Senator Joyce Broadsword
Idaho State Legislature
P.O. Box 83720
Boise, ID 83720

No comments

Branstetter, Kenneth, I53, Letter 1357097



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

We, Ken & Susan Branstetter, appreciate the opportunity to comment on USEPA's proposed Upper Basin Cleanup Plan.

I53-1 We have some serious questions about, and concerns with, this proposed plan. We are concerned with the plan's 50-90 year implementation timeline. This figure represents a substantial amount of energy and investment in the Coeur d'Alene Basin, and it is our feeling that a plan of this extensive length is not necessary to protect and preserve human health in the Silver Valley.

I53-2 We are also concerned that a plan of this length could potentially have serious impacts on the economy of the Valley, in terms of not only natural resource extraction, but also on our growing tourism sector.

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USEPA SF
1357097

Response to comment I53-1
See response to Comment No. I54-1.

Response to comment I53-2
See response to Comment No. I54-2.

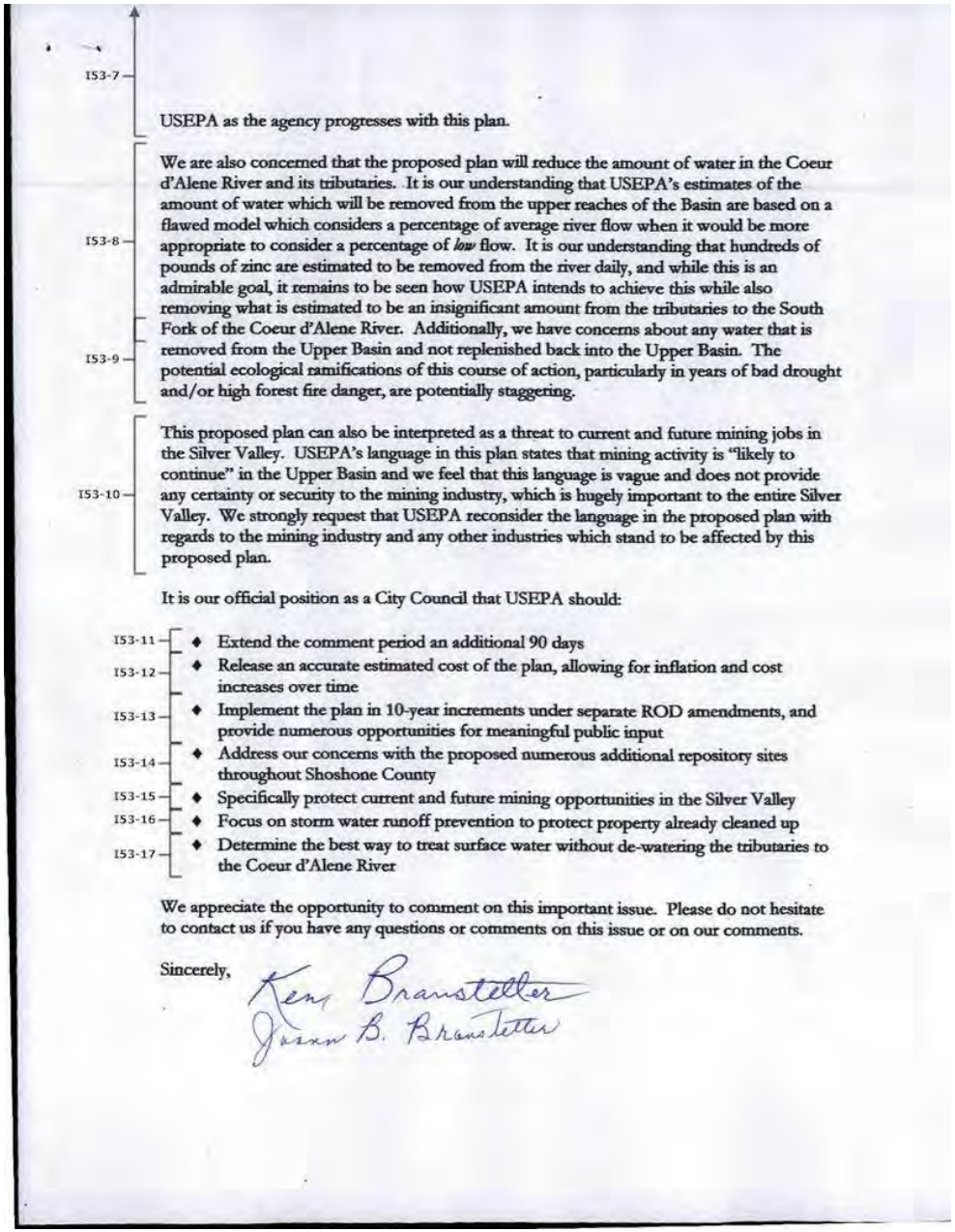
Response to comment I53-3
See response to Comment No. I54-3.

Response to comment I53-4
See response to Comment No. I54-4.

Response to comment I53-5
See response to Comment No. I54-5.

Response to comment I53-6
See response to Comment No. I54-6.

Response to comment I53-7
See response to Comment No. I54-7.



I53-7

USEPA as the agency progresses with this plan.

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I53-10

It is our official position as a City Council that USEPA should:

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We appreciate the opportunity to comment on this important issue. Please do not hesitate to contact us if you have any questions or comments on this issue or on our comments.

Sincerely,

Ken Branstetter
Joann B. Branstetter

Response to comment I53-8
See response to Comment No. I54-8.

Response to comment I53-9
See response to Comment No. I54-9.

Response to comment I53-10
See response to Comment No. I54-10.

Response to comment I53-11
See response to Comment No. I54-11.

Response to comment I53-12
See response to Comment No. I54-12.

Response to comment I53-13
See response to Comment No. I54-13.

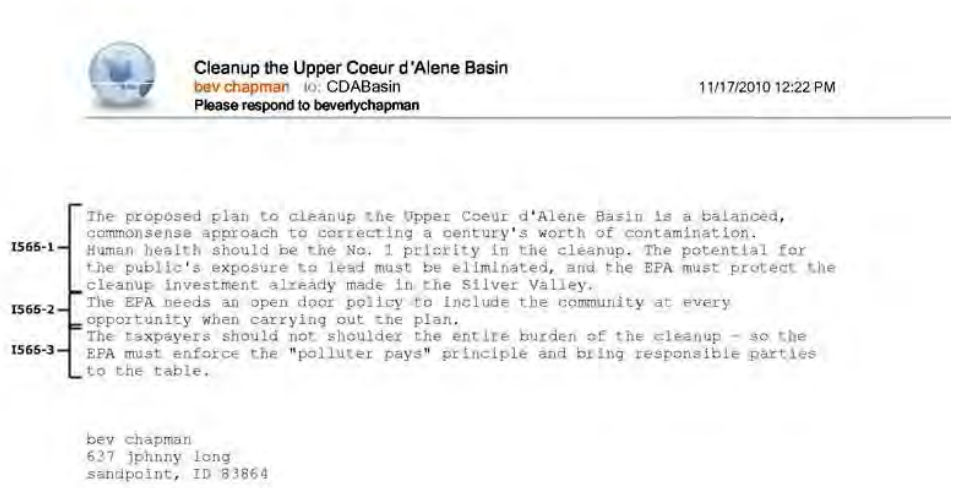
Response to comment I53-14
See response to Comment No. I54-14.

Response to comment I53-15
See response to Comment No. I54-15.

Response to comment I53-16
See response to Comment No. I54-16.

Response to comment I53-17
See response to Comment No. I54-17.

Branstetter, Michael, I566, Letter 617567



Cleanup the Upper Coeur d'Alene Basin
bev chapman to: CDABasin 11/17/2010 12:22 PM
Please respond to beverlychapman

I566-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I566-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I566-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

bev chapman
627 jphnny long
sandpoint, ID 83864

617567

Response to comment I566-1

See response to Comment No. I295-1.

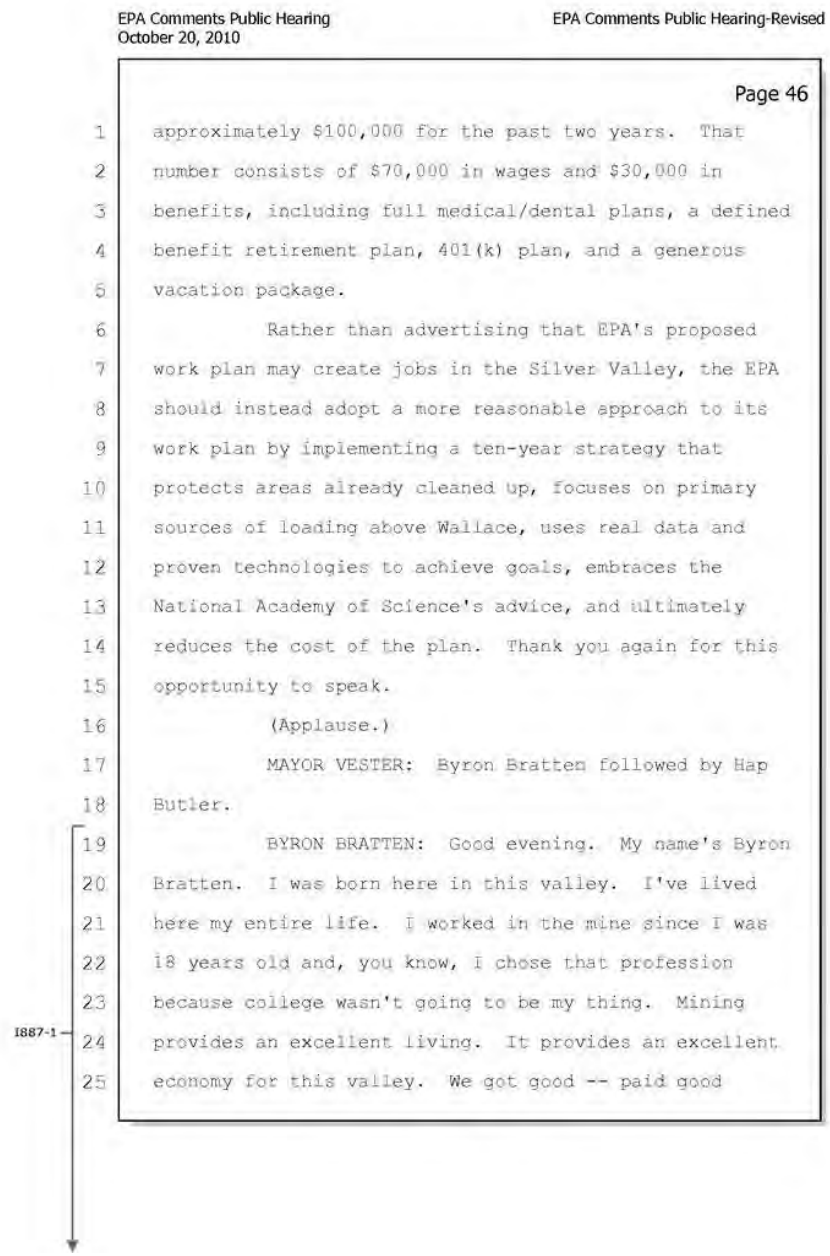
Response to comment I566-2

See response to Comment No. I295-2.

Response to comment I566-3

See response to Comment No. I295-3.

Bratten, Byron, I887, Letter 619651-18



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 46

approximately $100,000 for the past two years. That number consists of $70,000 in wages and $30,000 in benefits, including full medical/dental plans, a defined benefit retirement plan, 401(k) plan, and a generous vacation package.

Rather than advertising that EPA's proposed work plan may create jobs in the Silver Valley, the EPA should instead adopt a more reasonable approach to its work plan by implementing a ten-year strategy that protects areas already cleaned up, focuses on primary sources of loading above Wallace, uses real data and proven technologies to achieve goals, embraces the National Academy of Science's advice, and ultimately reduces the cost of the plan. Thank you again for this opportunity to speak.

(Applause.)

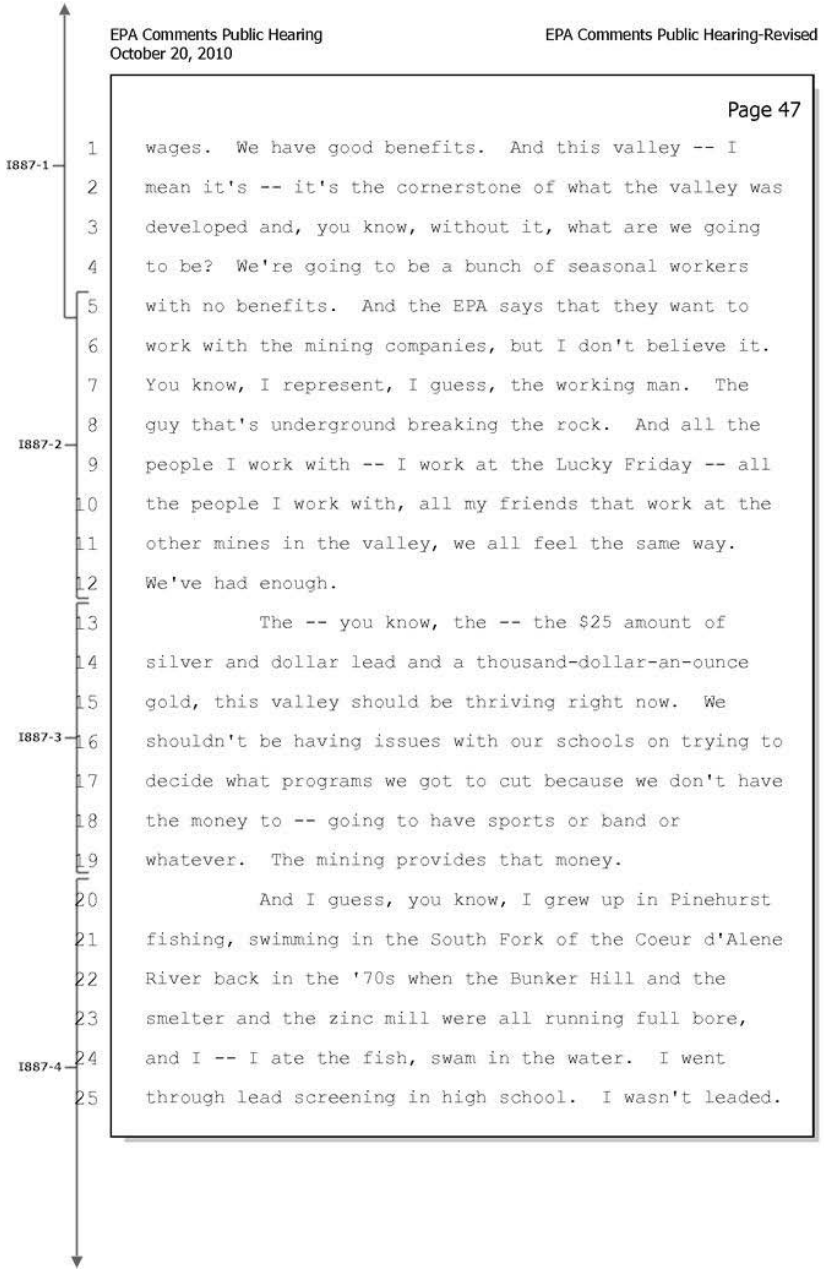
MAYOR VESTER: Byron Bratten followed by Hap Butler.

BYRON BRATTEN: Good evening. My name's Byron Bratten. I was born here in this valley. I've lived here my entire life. I worked in the mine since I was 18 years old and, you know, I chose that profession because college wasn't going to be my thing. Mining provides an excellent living. It provides an excellent economy for this valley. We got good -- paid good

I887-1

Response to comment I887-1

See responses to Comment Nos. LC32-2 and I58-5.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 47

I887-1 wages. We have good benefits. And this valley -- I mean it's -- it's the cornerstone of what the valley was developed and, you know, without it, what are we going to be? We're going to be a bunch of seasonal workers with no benefits. And the EPA says that they want to work with the mining companies, but I don't believe it. You know, I represent, I guess, the working man. The guy that's underground breaking the rock. And all the

I887-2 people I work with -- I work at the Lucky Friday -- all the people I work with, all my friends that work at the other mines in the valley, we all feel the same way. We've had enough.

The -- you know, the -- the $25 amount of silver and dollar lead and a thousand-dollar-an-ounce gold, this valley should be thriving right now. We

I887-3 shouldn't be having issues with our schools on trying to decide what programs we got to cut because we don't have the money to -- going to have sports or band or whatever. The mining provides that money.

And I guess, you know, I grew up in Pinehurst fishing, swimming in the South Fork of the Coeur d'Alene River back in the '70s when the Bunker Hill and the smelter and the zinc mill were all running full bore,

I887-4 and I -- I ate the fish, swam in the water. I went through lead screening in high school. I wasn't leaded.

Response to comment I887-2

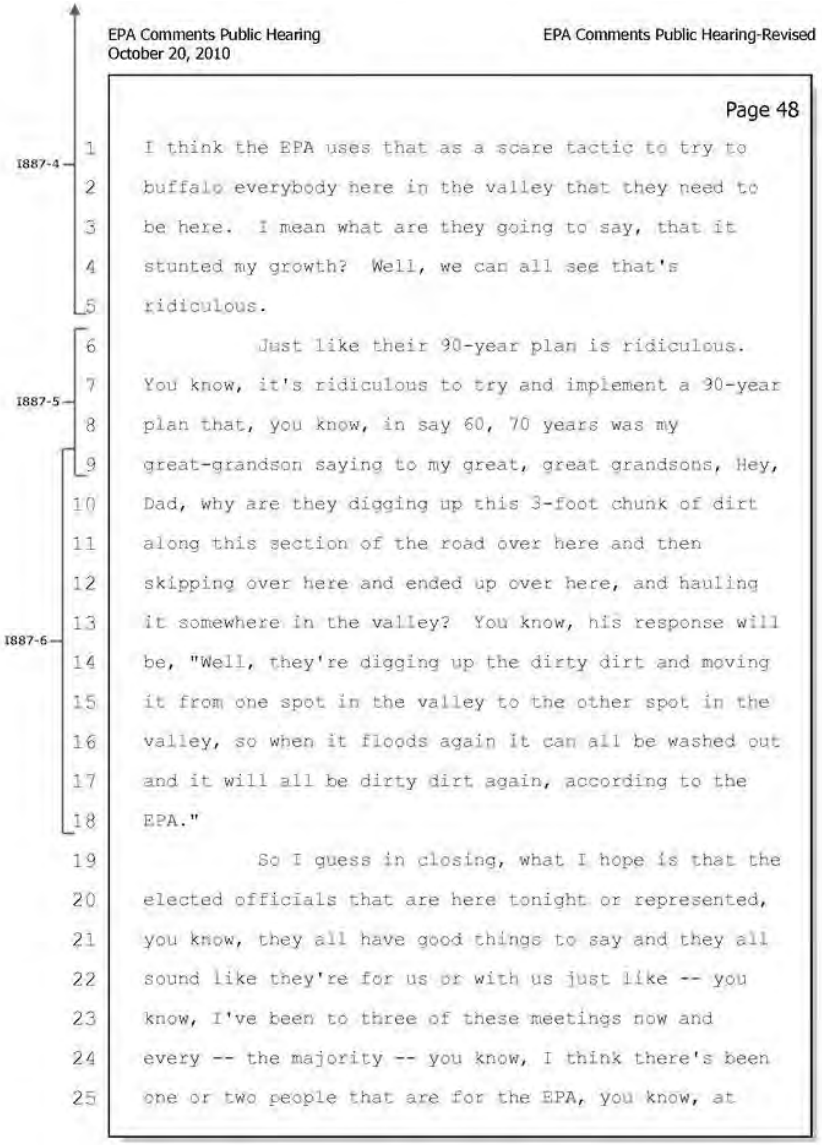
See response to Comment No. I58-5.

Response to comment I887-3

See response to Comment No. I58-5.

Response to comment I887-4

See response to Comment No. I295-1.



EPA Comments Public Hearing
October 20, 2010

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I887-4

I think the EPA uses that as a scare tactic to try to buffalo everybody here in the valley that they need to be here. I mean what are they going to say, that it stunted my growth? Well, we can all see that's ridiculous.

Just like their 90-year plan is ridiculous.

I887-5

You know, it's ridiculous to try and implement a 90-year plan that, you know, in say 60, 70 years was my great-grandson saying to my great, great grandsons, Hey, Dad, why are they digging up this 3-foot chunk of dirt along this section of the road over here and then skipping over here and ended up over here, and hauling it somewhere in the valley? You know, his response will

I887-6

be, "Well, they're digging up the dirty dirt and moving it from one spot in the valley to the other spot in the valley, so when it floods again it can all be washed out and it will all be dirty dirt again, according to the EPA."

So I guess in closing, what I hope is that the elected officials that are here tonight or represented, you know, they all have good things to say and they all sound like they're for us or with us just like -- you know, I've been to three of these meetings now and every -- the majority -- you know, I think there's been one or two people that are for the EPA, you know, at

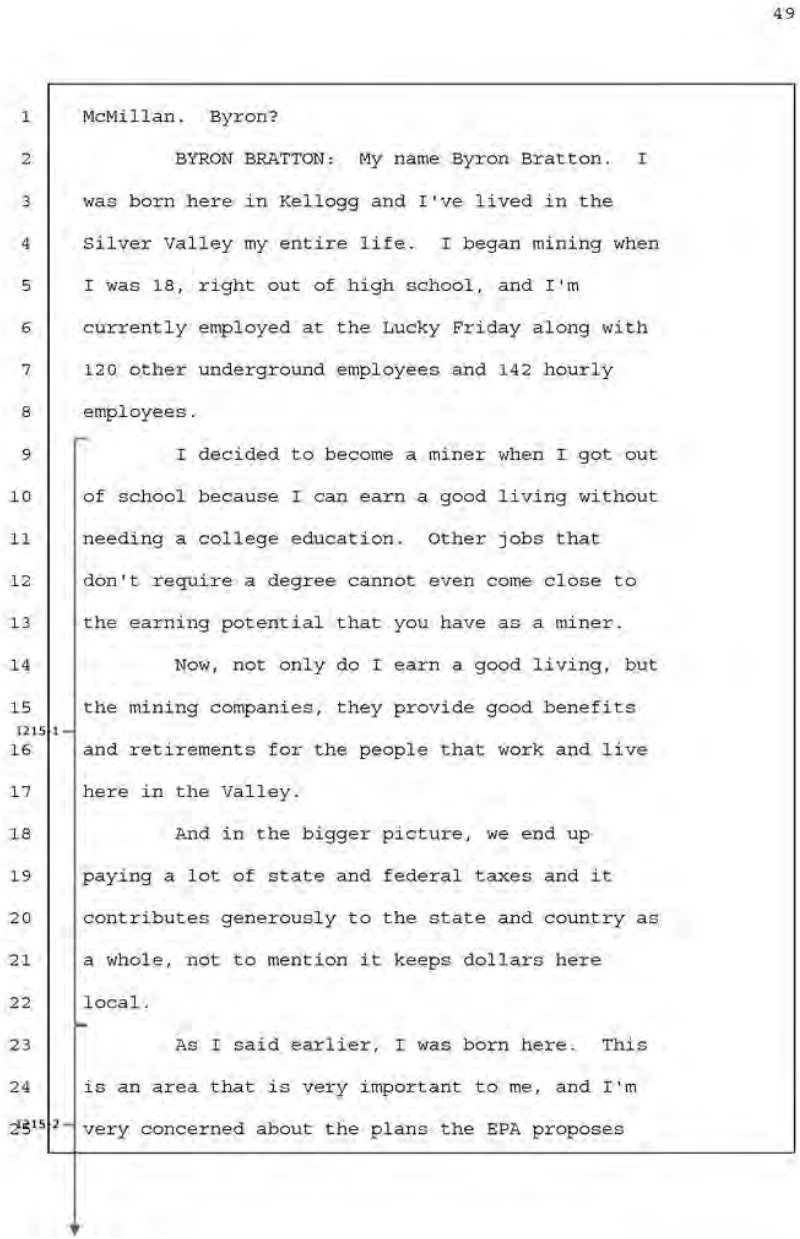
Response to comment I887-5

See response to Comment No. I58-1.

Response to comment I887-6

See response to Comment No. I54-3.

Bratton, Byron, I215, Letter 610097-10



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McMillan. Byron?

BYRON BRATTON: My name Byron Bratton. I was born here in Kellogg and I've lived in the Silver Valley my entire life. I began mining when I was 18, right out of high school, and I'm currently employed at the Lucky Friday along with 120 other underground employees and 142 hourly employees.

I decided to become a miner when I got out of school because I can earn a good living without needing a college education. Other jobs that don't require a degree cannot even come close to the earning potential that you have as a miner.

Now, not only do I earn a good living, but the mining companies, they provide good benefits and retirements for the people that work and live here in the Valley. I215-1

And in the bigger picture, we end up paying a lot of state and federal taxes and it contributes generously to the state and country as a whole, not to mention it keeps dollars here local.

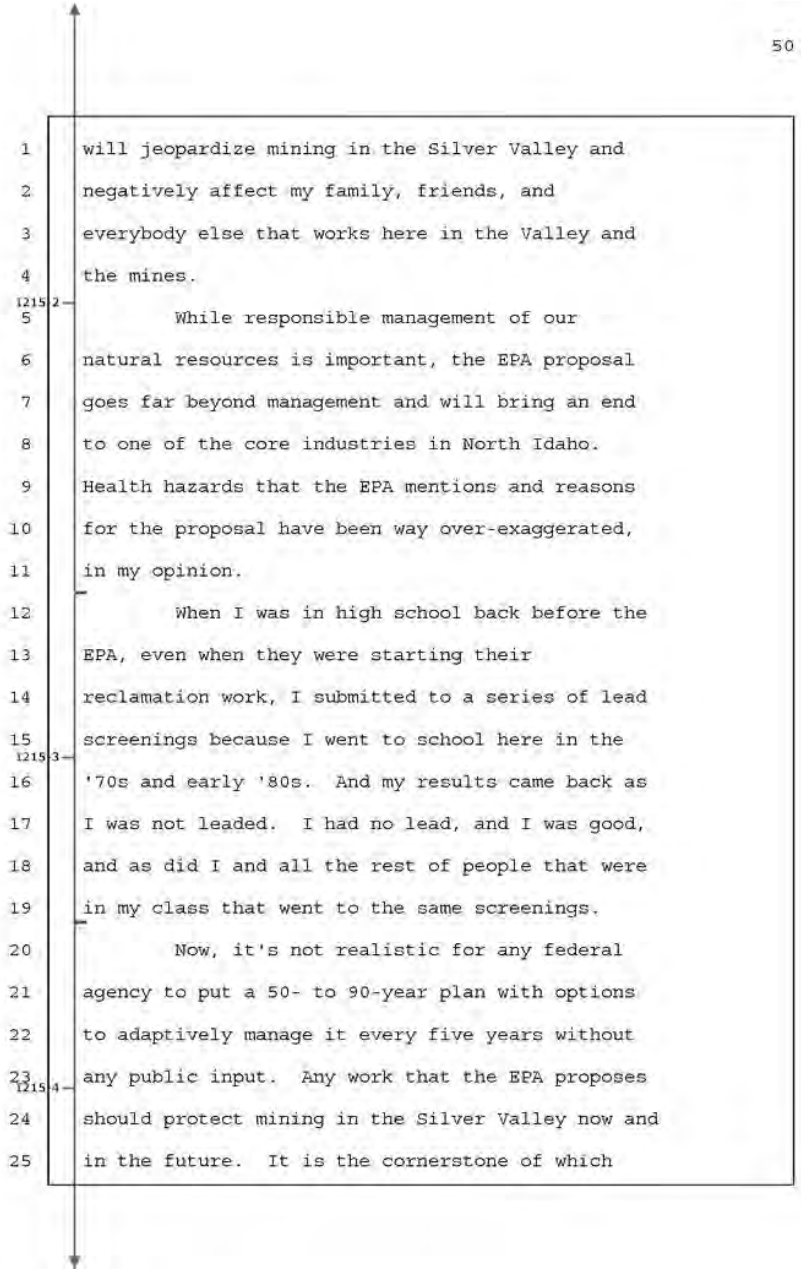
As I said earlier, I was born here. This is an area that is very important to me, and I'm very concerned about the plans the EPA proposes I215-2

Response to comment I215-1

Thank you for your comments.

Response to comment I215-2

See response to Comment No. I58-5. EPA and other agencies have conducted many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediments, groundwater, and surface water that poses risks to people, wildlife, and the environment.



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will jeopardize mining in the Silver Valley and negatively affect my family, friends, and everybody else that works here in the Valley and the mines.

I215-2 While responsible management of our natural resources is important, the EPA proposal goes far beyond management and will bring an end to one of the core industries in North Idaho. Health hazards that the EPA mentions and reasons for the proposal have been way over-exaggerated, in my opinion.

When I was in high school back before the EPA, even when they were starting their reclamation work, I submitted to a series of lead screenings because I went to school here in the

I215-3 '70s and early '80s. And my results came back as I was not leaded. I had no lead, and I was good, and as did I and all the rest of people that were in my class that went to the same screenings.

Now, it's not realistic for any federal agency to put a 50- to 90-year plan with options to adaptively manage it every five years without

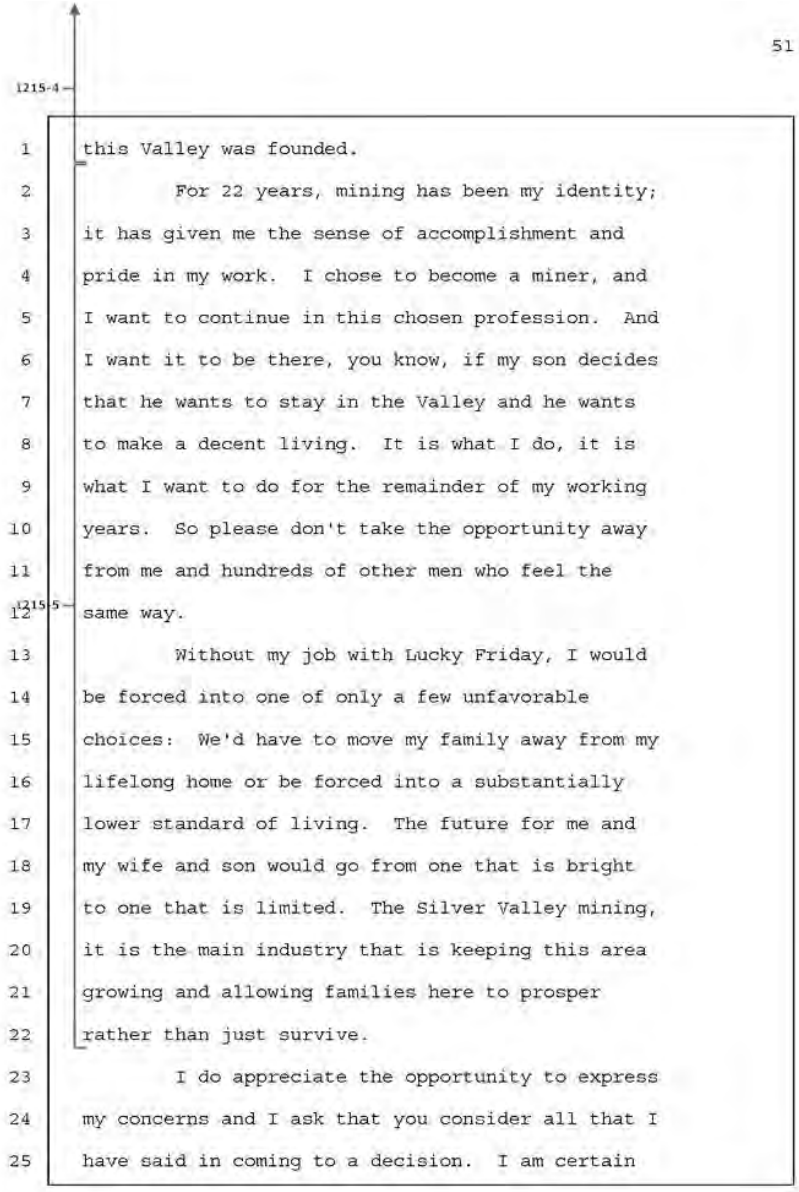
I215-4 any public input. Any work that the EPA proposes should protect mining in the Silver Valley now and in the future. It is the cornerstone of which

Response to comment I215-3

See response to Comment No. I295-1.

Response to comment I215-4

See responses to Comment Nos. LJ11-2 and I58-5.



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I215-4

this Valley was founded.

For 22 years, mining has been my identity; it has given me the sense of accomplishment and pride in my work. I chose to become a miner, and I want to continue in this chosen profession. And I want it to be there, you know, if my son decides that he wants to stay in the Valley and he wants to make a decent living. It is what I do, it is what I want to do for the remainder of my working years. So please don't take the opportunity away from me and hundreds of other men who feel the same way.

I215-5

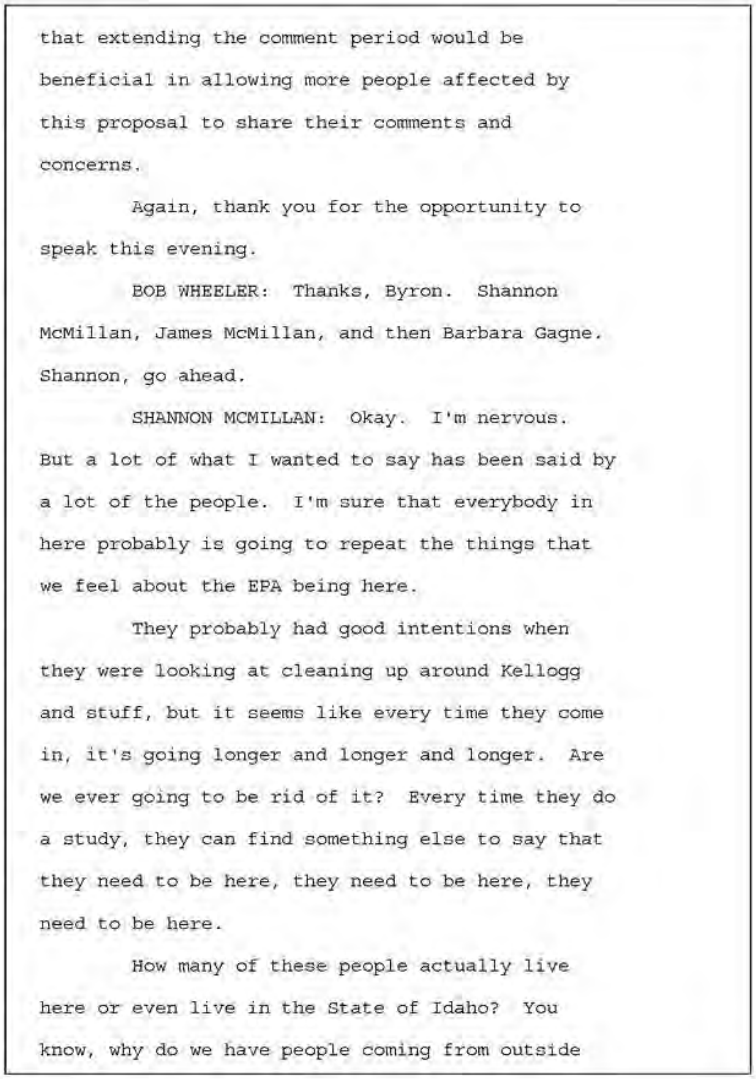
Without my job with Lucky Friday, I would be forced into one of only a few unfavorable choices: We'd have to move my family away from my lifelong home or be forced into a substantially lower standard of living. The future for me and my wife and son would go from one that is bright to one that is limited. The Silver Valley mining, it is the main industry that is keeping this area growing and allowing families here to prosper rather than just survive.

I do appreciate the opportunity to express my concerns and I ask that you consider all that I have said in coming to a decision. I am certain

Response to comment I215-5

See response to Comment No. I58-5.

No comments



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that extending the comment period would be beneficial in allowing more people affected by this proposal to share their comments and concerns.

Again, thank you for the opportunity to speak this evening.

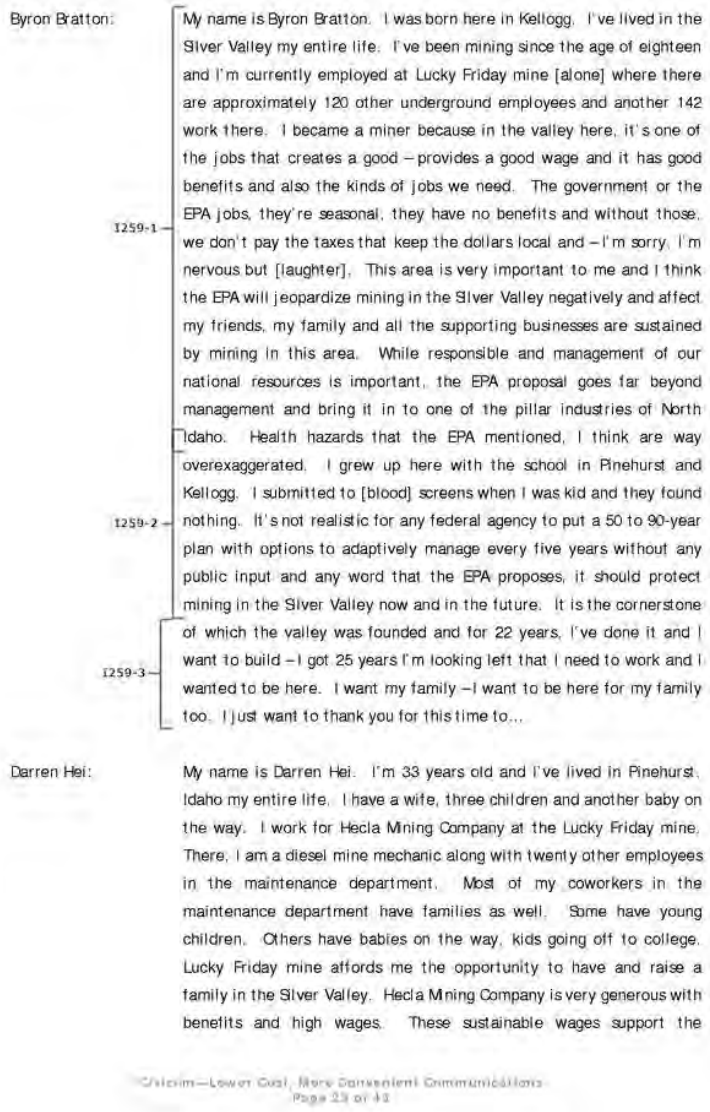
BOB WHEELER: Thanks, Byron. Shannon McMillan, James McMillan, and then Barbara Gagne. Shannon, go ahead.

SHANNON MCMILLAN: Okay. I'm nervous. But a lot of what I wanted to say has been said by a lot of the people. I'm sure that everybody in here probably is going to repeat the things that we feel about the EPA being here.

They probably had good intentions when they were looking at cleaning up around Kellogg and stuff, but it seems like every time they come in, it's going longer and longer and longer. Are we ever going to be rid of it? Every time they do a study, they can find something else to say that they need to be here, they need to be here, they need to be here.

How many of these people actually live here or even live in the State of Idaho? You know, why do we have people coming from outside

Bratton, Byron, I259, Letter 616015-22



Byron Bratton: My name is Byron Bratton. I was born here in Kellogg. I've lived in the Silver Valley my entire life. I've been mining since the age of eighteen and I'm currently employed at Lucky Friday mine [alone] where there are approximately 120 other underground employees and another 142 work there. I became a miner because in the valley here, it's one of the jobs that creates a good – provides a good wage and it has good benefits and also the kinds of jobs we need. The government or the EPA jobs, they're seasonal, they have no benefits and without those, we don't pay the taxes that keep the dollars local and – I'm sorry, I'm nervous but [laughter]. This area is very important to me and I think the EPA will jeopardize mining in the Silver Valley negatively and affect my friends, my family and all the supporting businesses are sustained by mining in this area. While responsible and management of our national resources is important, the EPA proposal goes far beyond management and bring it in to one of the pillar industries of North Idaho. Health hazards that the EPA mentioned, I think are way overexaggerated. I grew up here with the school in Pinehurst and Kellogg. I submitted to [blood] screens when I was kid and they found nothing. It's not realistic for any federal agency to put a 50 to 90-year plan with options to adaptively manage every five years without any public input and any word that the EPA proposes, it should protect mining in the Silver Valley now and in the future. It is the cornerstone of which the valley was founded and for 22 years, I've done it and I want to build – I got 25 years I'm looking left that I need to work and I wanted to be here. I want my family – I want to be here for my family too. I just want to thank you for this time to...

I259-1

I259-2

I259-3

Darren Hei: My name is Darren Hei. I'm 33 years old and I've lived in Pinehurst, Idaho my entire life. I have a wife, three children and another baby on the way. I work for Hecla Mining Company at the Lucky Friday mine. There, I am a diesel mine mechanic along with twenty other employees in the maintenance department. Most of my coworkers in the maintenance department have families as well. Some have young children. Others have babies on the way, kids going off to college. Lucky Friday mine affords me the opportunity to have and raise a family in the Silver Valley. Hecla Mining Company is very generous with benefits and high wages. These sustainable wages support the

Citizen—Lower Cost, More Convenient Communications
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Response to comment I259-1

See responses to Comment Nos. I58-5 and LC32-2.

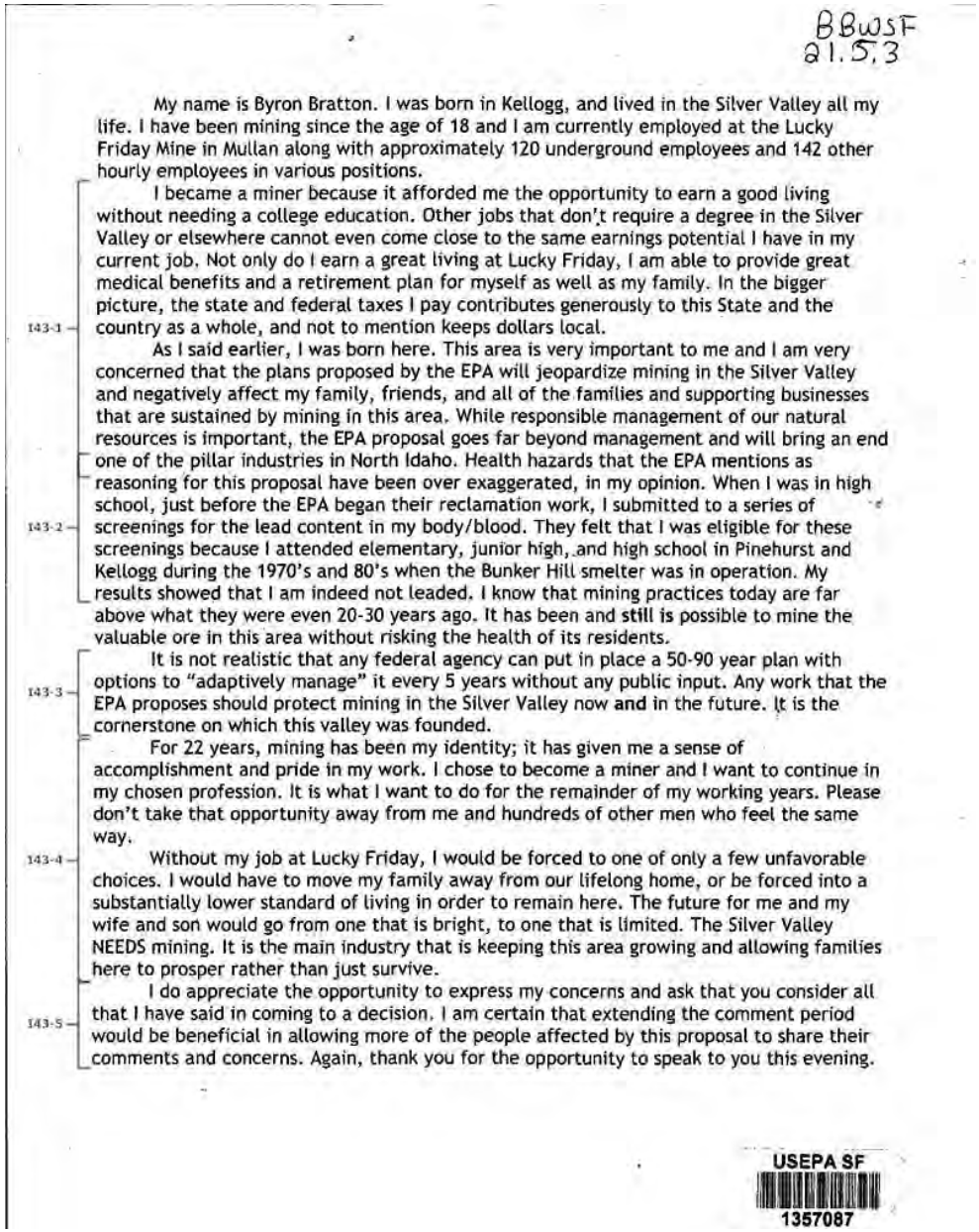
Response to comment I259-2

There are serious risks to human health from heavy metal contamination in the Basin. The risks are well documented. EPA has a regulatory responsibility to address these risks. Lead is of most concern, especially for young children and pregnant women. Though some cleanup has been done, there is more work to do to protect people. Cleaning up contamination in the Upper Basin will reduce the amount of metals that flows downstream through communities. Also, some of the work done under the ROD Amendment will help keep cleaned-up areas clean. It will address tributary flooding, which can spread contamination. See response to Comment No. I58-1 regarding the reduced scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. See responses to Comment Nos. LI11-2 and I58-5 regarding public input and mining in the Silver Valley.

Response to comment I259-3

Thank you for your comment.

Bratton, Byron, I43, Letter 1357087



BBWSF
21.5.3

My name is Byron Bratton. I was born in Kellogg, and lived in the Silver Valley all my life. I have been mining since the age of 18 and I am currently employed at the Lucky Friday Mine in Mullan along with approximately 120 underground employees and 142 other hourly employees in various positions.

I became a miner because it afforded me the opportunity to earn a good living without needing a college education. Other jobs that don't require a degree in the Silver Valley or elsewhere cannot even come close to the same earnings potential I have in my current job. Not only do I earn a great living at Lucky Friday, I am able to provide great medical benefits and a retirement plan for myself as well as my family. In the bigger picture, the state and federal taxes I pay contributes generously to this State and the country as a whole, and not to mention keeps dollars local. I43-1

As I said earlier, I was born here. This area is very important to me and I am very concerned that the plans proposed by the EPA will jeopardize mining in the Silver Valley and negatively affect my family, friends, and all of the families and supporting businesses that are sustained by mining in this area. While responsible management of our natural resources is important, the EPA proposal goes far beyond management and will bring an end one of the pillar industries in North Idaho. Health hazards that the EPA mentions as reasoning for this proposal have been over exaggerated, in my opinion. When I was in high school, just before the EPA began their reclamation work, I submitted to a series of screenings for the lead content in my body/blood. They felt that I was eligible for these screenings because I attended elementary, junior high, and high school in Pinehurst and Kellogg during the 1970's and 80's when the Bunker Hill smelter was in operation. My results showed that I am indeed not leaded. I know that mining practices today are far above what they were even 20-30 years ago. It has been and **still** is possible to mine the valuable ore in this area without risking the health of its residents. I43-2

It is not realistic that any federal agency can put in place a 50-90 year plan with options to "adaptively manage" it every 5 years without any public input. Any work that the EPA proposes should protect mining in the Silver Valley now **and** in the future. It is the cornerstone on which this valley was founded. I43-3

For 22 years, mining has been my identity; it has given me a sense of accomplishment and pride in my work. I chose to become a miner and I want to continue in my chosen profession. It is what I want to do for the remainder of my working years. Please don't take that opportunity away from me and hundreds of other men who feel the same way.

Without my job at Lucky Friday, I would be forced to one of only a few unfavorable choices. I would have to move my family away from our lifelong home, or be forced into a substantially lower standard of living in order to remain here. The future for me and my wife and son would go from one that is bright, to one that is limited. The Silver Valley NEEDS mining. It is the main industry that is keeping this area growing and allowing families here to prosper rather than just survive. I43-4

I do appreciate the opportunity to express my concerns and ask that you consider all that I have said in coming to a decision. I am certain that extending the comment period would be beneficial in allowing more of the people affected by this proposal to share their comments and concerns. Again, thank you for the opportunity to speak to you this evening. I43-5

USEPA SF
1357087

Response to comment I43-1
See response to Comment No. I58-5.

Response to comment I43-2
See response to Comment No. I295-1.

Response to comment I43-3
See responses to Comment Nos. I58-4 and LJ11-2.

Response to comment I43-4
See response to Comment No. I58-5.

Response to comment I43-5
See response to Comment No. I54-6.

Braun, Rodney, I1, Letter 896724

Rod Braun
to:
CDABasin
07/14/2010 07:22 AM
Show Details

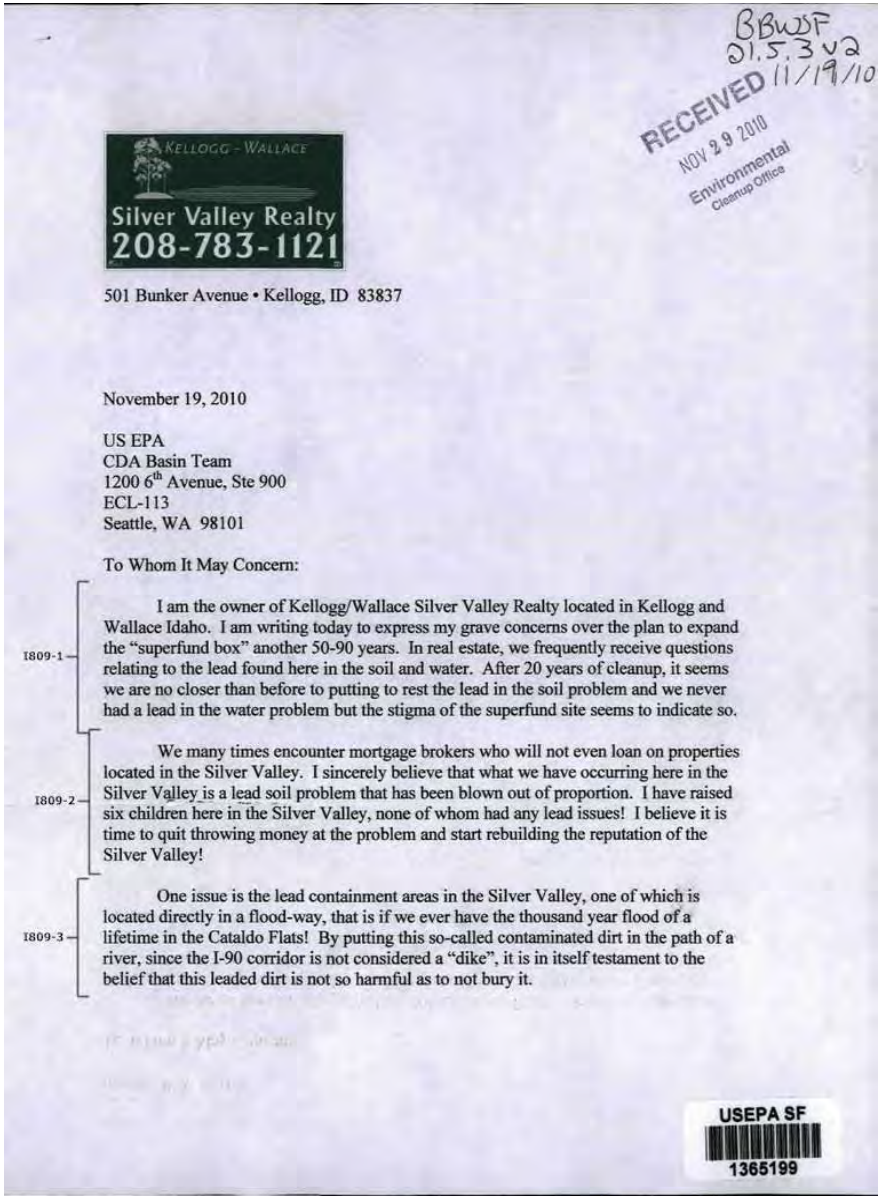
I1-1 — **The same questions were being asked in 1990 when I worked for the BLM – that's right, TWENTY YEARS AGO…order another study, drag it on another few years, order more studies – keep the grants rolling, justify your existence – do you actually think the public believes you're looking for a solution? Guess again. There were so many redundant reports and articles written that we had to create a data base and library…there is enough empirical evidence to make a decision without dragging it on another TWENTY YEARS.**

Rodney D. Braun
Commercial Appraisal Division
Kootenai County Assessor's Office
208-446-1521
rbraun@kcgov.us

896724

Response to comment I1-1
Comment noted.

Breazeal, Rose, I809, Letter 1365199



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Environmental Cleanup Office

KELLOGG - WALLACE
Silver Valley Realty
208-783-1121

501 Bunker Avenue • Kellogg, ID 83837

November 19, 2010

US EPA
CDA Basin Team
1200 6th Avenue, Ste 900
ECL-113
Seattle, WA 98101

To Whom It May Concern:

I809-1 I am the owner of Kellogg/Wallace Silver Valley Realty located in Kellogg and Wallace Idaho. I am writing today to express my grave concerns over the plan to expand the "superfund box" another 50-90 years. In real estate, we frequently receive questions relating to the lead found here in the soil and water. After 20 years of cleanup, it seems we are no closer than before to putting to rest the lead in the soil problem and we never had a lead in the water problem but the stigma of the superfund site seems to indicate so.

I809-2 We many times encounter mortgage brokers who will not even loan on properties located in the Silver Valley. I sincerely believe that what we have occurring here in the Silver Valley is a lead soil problem that has been blown out of proportion. I have raised six children here in the Silver Valley, none of whom had any lead issues! I believe it is time to quit throwing money at the problem and start rebuilding the reputation of the Silver Valley!

I809-3 One issue is the lead containment areas in the Silver Valley, one of which is located directly in a flood-way, that is if we ever have the thousand year flood of a lifetime in the Cataldo Flats! By putting this so-called contaminated dirt in the path of a river, since the I-90 corridor is not considered a "dike", it is in itself testament to the belief that this leaded dirt is not so harmful as to not bury it.

USEPA SF
1365199

Response to comment I809-1

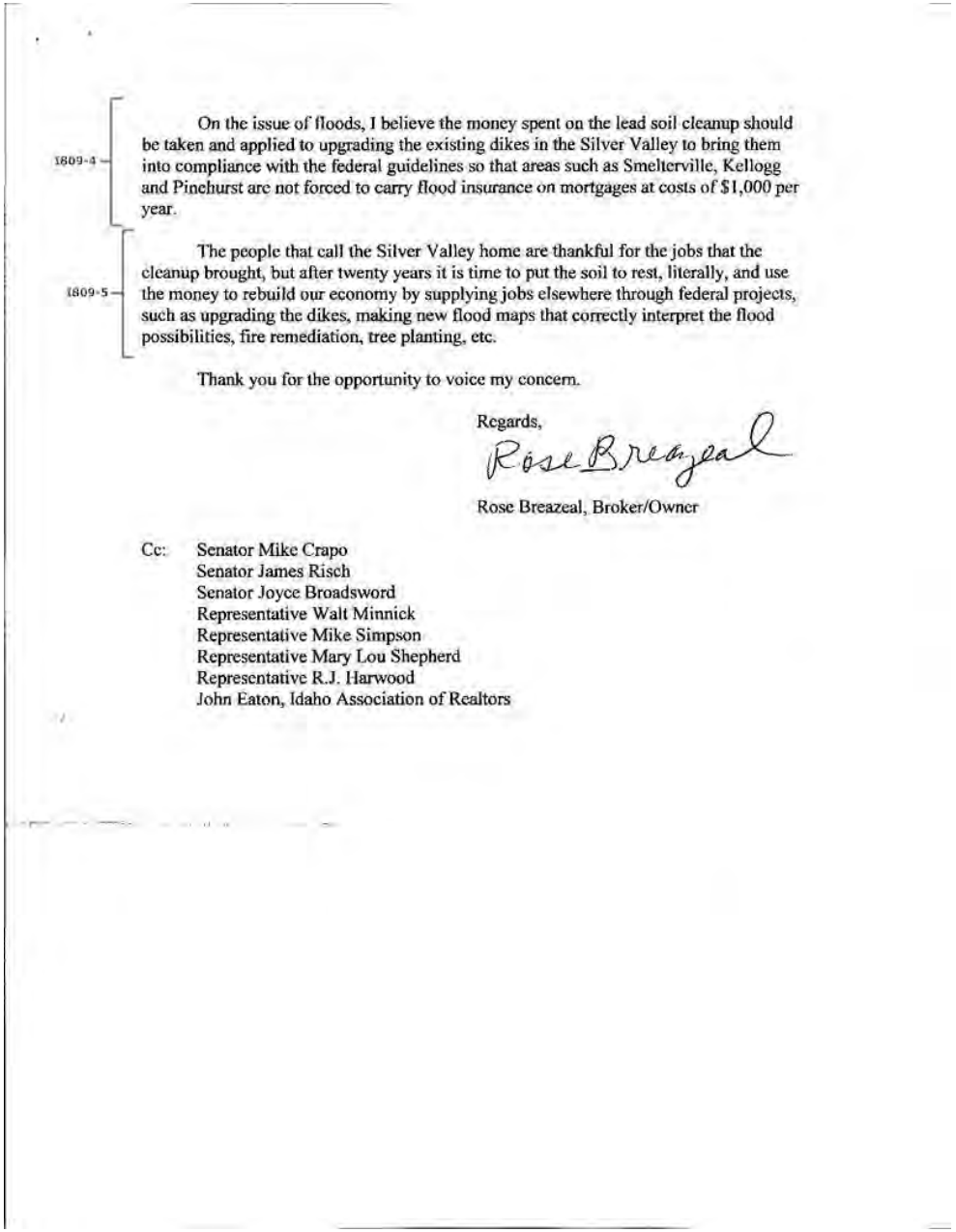
See response to Comment No. I58-1.

Response to comment I809-2

EPA and other agencies have conducted many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. The primary human health concern in the Coeur d'Alene Basin is excessive lead in the blood of young children and pregnant women.

Response to comment I809-3

See response to Comment No. LC21-9.



I809-4 On the issue of floods, I believe the money spent on the lead soil cleanup should be taken and applied to upgrading the existing dikes in the Silver Valley to bring them into compliance with the federal guidelines so that areas such as Smelterville, Kellogg and Pinehurst are not forced to carry flood insurance on mortgages at costs of $1,000 per year.

I809-5 The people that call the Silver Valley home are thankful for the jobs that the cleanup brought, but after twenty years it is time to put the soil to rest, literally, and use the money to rebuild our economy by supplying jobs elsewhere through federal projects, such as upgrading the dikes, making new flood maps that correctly interpret the flood possibilities, fire remediation, tree planting, etc.

Thank you for the opportunity to voice my concern.

Regards,

Rose Breazeal

Rose Breazeal, Broker/Owner

Cc: Senator Mike Crapo
Senator James Risch
Senator Joyce Broadsword
Representative Walt Minnick
Representative Mike Simpson
Representative Mary Lou Shepherd
Representative R.J. Harwood
John Eaton, Idaho Association of Realtors

Response to comment I809-4

EPA is eager to ensure the long-term performance of the Selected Human Health Remedies and understands that local communities are concerned about flood insurance requirements and development restrictions associated with updated Flood Insurance Rate Maps. However, CERCLA requires that EPA's contribution to flood control work must have a direct connection to the CERCLA remedy.

Response to comment I809-5

Thank you for your comment.

Briggs, Jeff, I295, Letter 614425

Cleanup the Upper Coeur d'Alene Basin
Jeff Briggs to: CDABasin 10/29/2010 03:43 PM
Please respond to jbriggs

I295-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I295-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I295-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Jeff Briggs
923 E. Augusta Ave
Spokane, WA 99207

614425

Response to comment I295-1

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. As described in the ROD Amendment, EPA and other agencies have done many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. The primary human health concern in the Upper Basin is excessive lead in the blood of young children and pregnant women. Site-specific analysis of blood lead data paired with environmental lead data demonstrate that complex exposure pathways exist. Human health has been and continues to be EPA's priority for cleanup, and EPA has targeted cleanup actions to reduce human health exposures. EPA is committed to addressing the remaining unacceptable human health risks in the Upper Basin.

Cleanup of Upper Basin areas will also greatly reduce the amount of lead being transported down the Coeur d'Alene River and settling in Lower Basin areas and Coeur d'Alene Lake, posing potential risks to human health. Cleanup of Upper Basin areas will also reduce the risk of future recontamination of remediated Lower Basin areas, thereby minimizing the need for follow up cleanup work in those areas.

The remedy protection actions included in the cleanup plan will protect the existing human health clean-soil barriers installed within Upper Basin communities from tributary flooding and other high-precipitation events, thereby protecting the cleanup investments made as part of the existing Selected Human Health Remedies for OUs 1, 2, and 3.

Response to comment I295-2

EPA is committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has engaged the public through all phases of its work. Most importantly, EPA has encouraged the public to be involved in selection of the remedies for OUs 1, 2, and 3 and,

most recently, the Selected Remedy for the Upper Basin. Throughout the ROD Amendment process, EPA met regularly with the Basin Environmental Improvement Project Commission's (the Basin Commission's) Upper Basin Project Focus Team (PFT), a group focused on technical issues related to cleanup. The PFT members include interested citizens and representatives from the State of Idaho, Shoshone County, the U.S. Bureau of Land Management, the U.S. Fish and Wildlife Service, the U.S. Forest Service, the Coeur d'Alene and Spokane Tribes, and the State of Washington. In addition to its meetings with the Upper Basin PFT, EPA has provided a wide range of opportunities for community participation in the selection of a remedy for the Upper Basin. Since late 2008, EPA has hosted and/or attended about 60 meetings to share information and gather input for development of the Focused Feasibility Study Report and the Proposed Plan and, ultimately, the ROD Amendment. EPA has engaged local residents, elected officials, community groups, and many other stakeholders in the decisionmaking process. This outreach has included working with the Basin Commission, its Technical Leadership Group, and the Citizens' Coordinating Council.

EPA's efforts to provide opportunities for public participation more than satisfy the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act and the National Oil and Hazardous Substances Pollution Contingency Plan. The input EPA has received from the public has been instrumental in the changes made to the Upper Basin cleanup plan since the Proposed Plan was issued. The ongoing involvement of the community will be an important part of the cleanup as it moves forward.

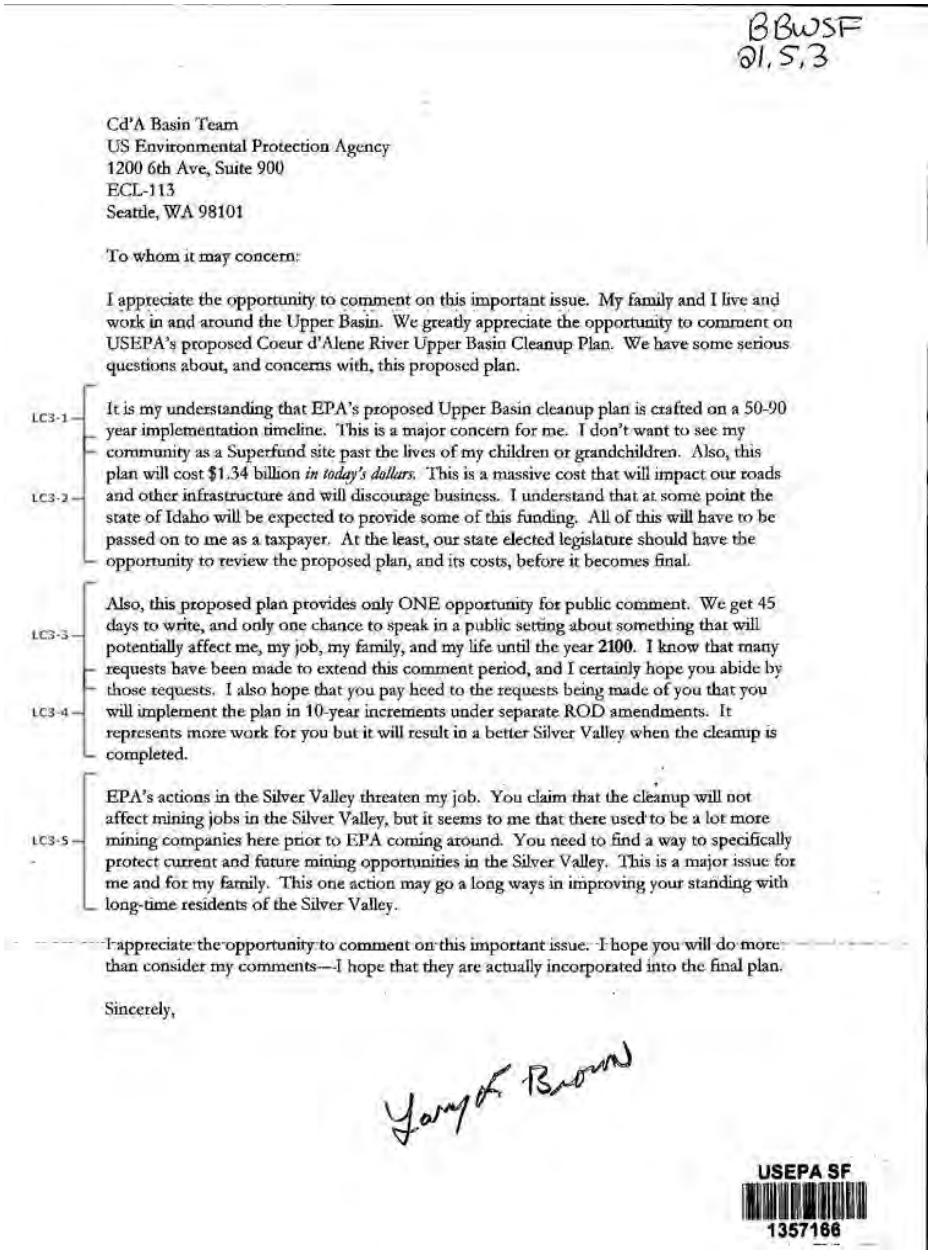
Response to comment I295-3

EPA will pay for much of the proposed cleanup with funds from legal settlements between mining companies and the federal government. CERCLA creates a liability scheme that prioritizes cleanup by potential responsible parties (PRPs). In this instance EPA has maximized cost recovery from the PRPs. The cleanup will proceed as quickly as possible while balancing the need to let interest accrue on settlement monies, allowing for completion of the cleanup throughout the Upper and Lower Basin. Taxpayer dollars used to fund the cleanup, if any, will augment settlement funds.

At this time, EPA has recovered the largest amount of available settlement funds—more than $573 million—from the ASARCO bankruptcy proceedings completed in 2009. Of this total, $494 million is apportioned for EPA response activities and the remainder will be used for mitigation of natural resource damages. An independent Work Trust has been established to manage the ASARCO settlement funds and conduct the EPA-approved cleanup. The money held by the Work Trust is invested by a private investment firm, allowing this fund to continue to grow. Spending and investing under this Work Trust will be carefully managed by EPA to ensure the continued growth of the Trust while balancing the need to conduct cleanup in an efficient and a timely manner.

In 2011, a significant settlement was reached with Hecla Mining Company. Under this settlement, Hecla will pay $263.4 million plus interest to the United States, the Coeur d'Alene Tribe, and the State of Idaho to resolve claims stemming from releases of wastes from its mining operations. Most (75 percent) of the recovery funds will be used for response actions at the Bunker Hill Superfund Site. The remaining amount will fund natural resource restoration projects.

Brown, Gary, LC3, Letter 1357166



BBWSF
21,5,3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

LC3-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
LC3-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

LC3-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
LC3-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

LC3-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Gary L Brown

USEPA SF
1357166

Response to comment LC3-1
See response to Comment No. I58-1.

Response to comment LC3-2
See response to Comment No. I58-2.

Response to comment LC3-3
See response to Comment No. I58-3.

Response to comment LC3-4
See response to Comment No. I58-4.

Response to comment LC3-5
See response to Comment No. I58-5.

Brown, Jonathan, I546, Letter 617289

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
geo_1948@yahoo.com to: formsubmission 11/17/2010 11:22 AM
Sent by: Geo_1948@Yahoo.Com <geo_1948=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Jonathan Brown
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I546-1 My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: Although I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley I think that state government and Federal Land Management Agencies ought to regulate mining in a particular state. EPA can play an oversight role but this over expansive reach of jurisdiction is not appropriate. I546-2
I546-3 Finally, stop trampling on the professionalism of state resource specialists, and others that are diligently working as resource specialists for State and Federal agencies, especially colleagues within the Forest Service and the Bureau of Land Management.
Coeur d'Alene Basin Resident: No
Email Address: geo_1948@yahoo.com
Mailing Address: 3345 Idlewild Drive|Reno|Nevada|89509|US
Phone Number: (775) 233-9291

617289

Response to comment I546-1

See response to Comment No. I351-1.

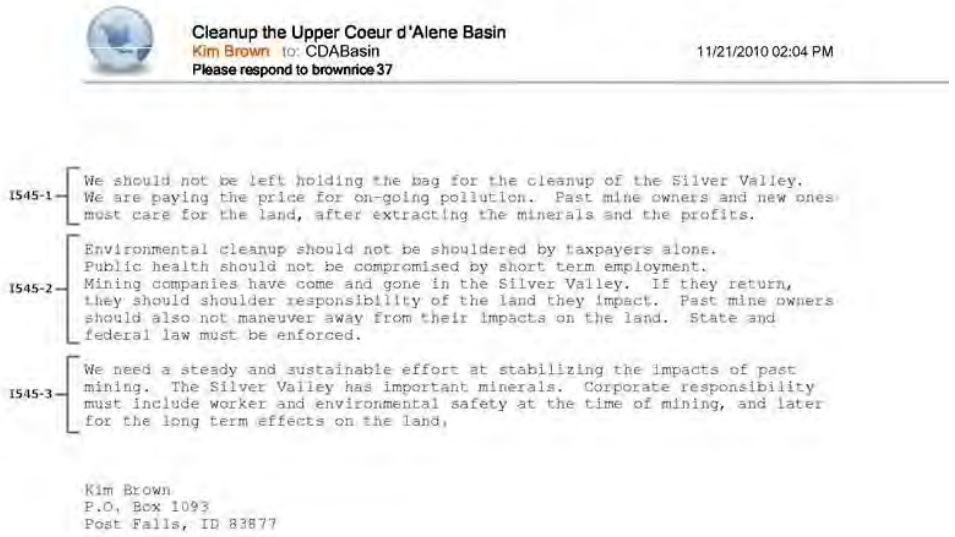
Response to comment I546-2

See response to Comment No. LJ39-5.

Response to comment I546-3

See response to Comment No. LJ39-5.

Brown, Kim, I545, Letter 617288



Cleanup the Upper Coeur d'Alene Basin
Kim Brown to: CDABasin 11/21/2010 02:04 PM
Please respond to brownrice37

I545-1 We should not be left holding the bag for the cleanup of the Silver Valley. We are paying the price for on-going pollution. Past mine owners and new ones must care for the land, after extracting the minerals and the profits.

I545-2 Environmental cleanup should not be shouldered by taxpayers alone. Public health should not be compromised by short term employment. Mining companies have come and gone in the Silver Valley. If they return, they should shoulder responsibility of the land they impact. Past mine owners should also not maneuver away from their impacts on the land. State and federal law must be enforced.

I545-3 We need a steady and sustainable effort at stabilizing the impacts of past mining. The Silver Valley has important minerals. Corporate responsibility must include worker and environmental safety at the time of mining, and later for the long term effects on the land.

Kim Brown
P.O. Box 1093
Post Falls, ID 83877

617288

Response to comment I545-1

See response to Comment No. I295-3.

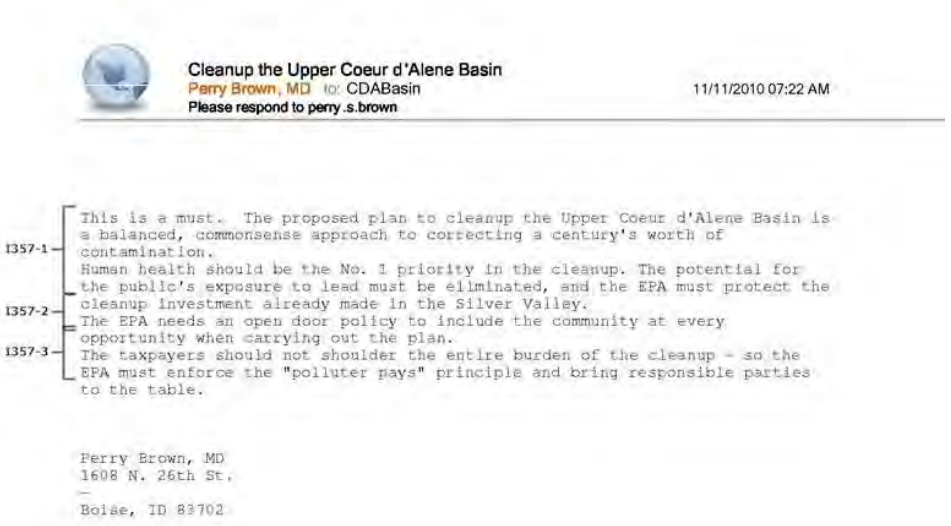
Response to comment I545-2

See response to Comment No. I295-3.

Response to comment I545-3

Thank you for your comment.

Brown, Perry, I357, Letter 616242



Cleanup the Upper Coeur d'Alene Basin
Perry Brown, MD to: CDABasin 11/11/2010 07:22 AM
Please respond to perry.s.brown

I357-1 This is a must. The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination.

I357-2 Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I357-3 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan. The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Perry Brown, MD
1608 N. 26th St.
Boise, ID 83702

616242

Response to comment I357-1

See response to Comment No. I295-1.

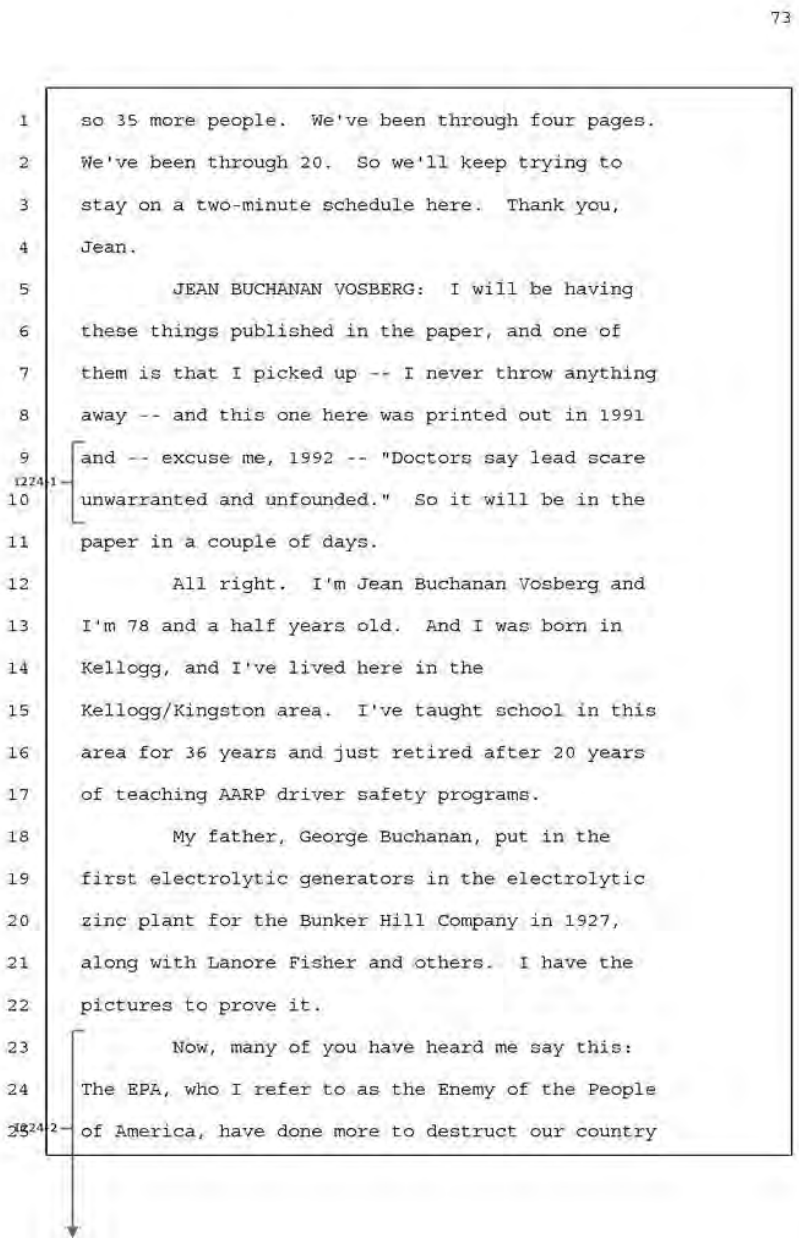
Response to comment I357-2

See response to Comment No. I295-2.

Response to comment I357-3

See response to Comment No. I295-3.

Buchanan-Vosberg, Jean, I224, Letter 610097-19



73

so 35 more people. We've been through four pages. We've been through 20. So we'll keep trying to stay on a two-minute schedule here. Thank you, Jean.

JEAN BUCHANAN VOSBERG: I will be having these things published in the paper, and one of them is that I picked up -- I never throw anything away -- and this one here was printed out in 1991 and -- excuse me, 1992 -- "Doctors say lead scare unwarranted and unfounded." So it will be in the paper in a couple of days. I224-1

All right. I'm Jean Buchanan Vosberg and I'm 78 and a half years old. And I was born in Kellogg, and I've lived here in the Kellogg/Kingston area. I've taught school in this area for 36 years and just retired after 20 years of teaching AARP driver safety programs.

My father, George Buchanan, put in the first electrolytic generators in the electrolytic zinc plant for the Bunker Hill Company in 1927, along with Lanore Fisher and others. I have the pictures to prove it.

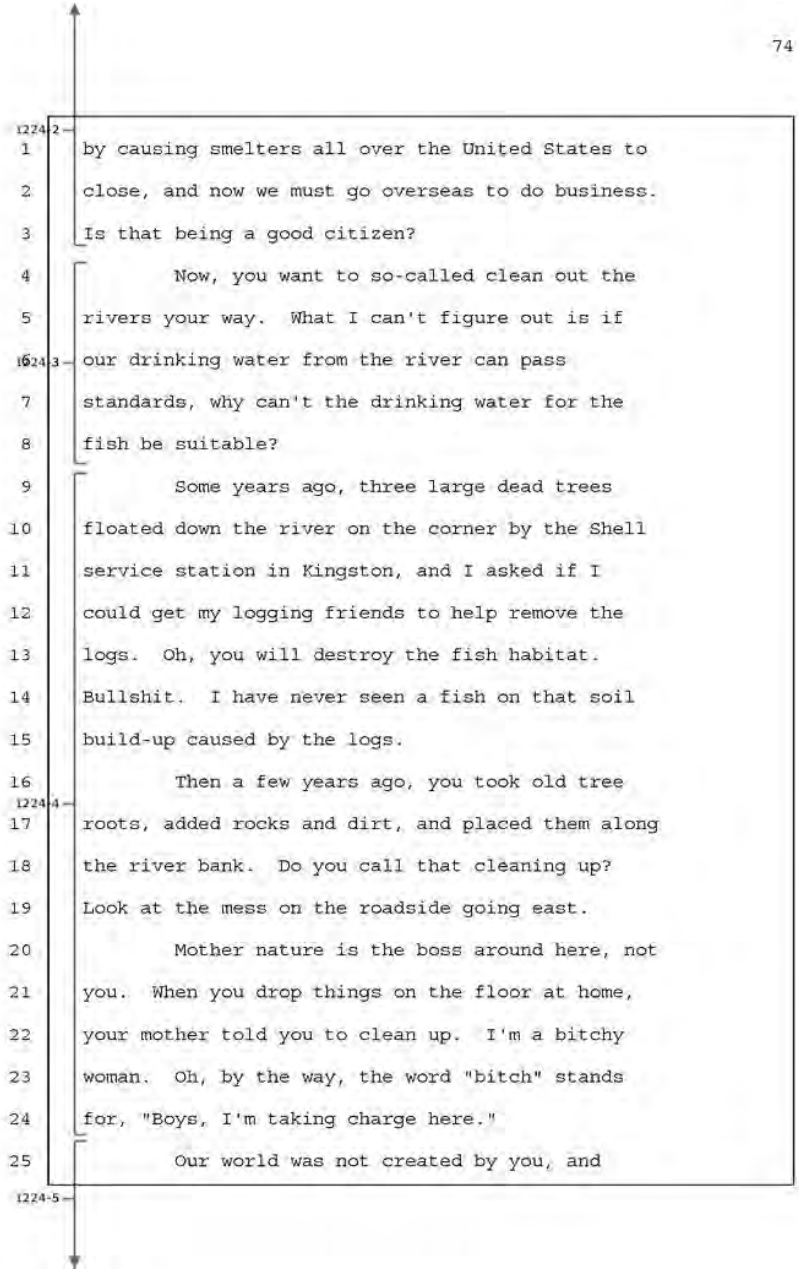
Now, many of you have heard me say this: The EPA, who I refer to as the Enemy of the People of America, have done more to destruct our country I224-2

Response to comment I224-1

See response to Comment No. I295-1.

Response to comment I224-2

Comment noted.



74

I224-2
by causing smelters all over the United States to close, and now we must go overseas to do business. Is that being a good citizen?

Now, you want to so-called clean out the rivers your way. What I can't figure out is if
I224-3
our drinking water from the river can pass standards, why can't the drinking water for the fish be suitable?

Some years ago, three large dead trees floated down the river on the corner by the Shell service station in Kingston, and I asked if I could get my logging friends to help remove the logs. Oh, you will destroy the fish habitat. Bullshit. I have never seen a fish on that soil build-up caused by the logs.

Then a few years ago, you took old tree
I224-4
roots, added rocks and dirt, and placed them along the river bank. Do you call that cleaning up? Look at the mess on the roadside going east.

Mother nature is the boss around here, not you. When you drop things on the floor at home, your mother told you to clean up. I'm a bitchy woman. Oh, by the way, the word "bitch" stands for, "Boys, I'm taking charge here."

Our world was not created by you, and
I224-5

Response to comment I224-3

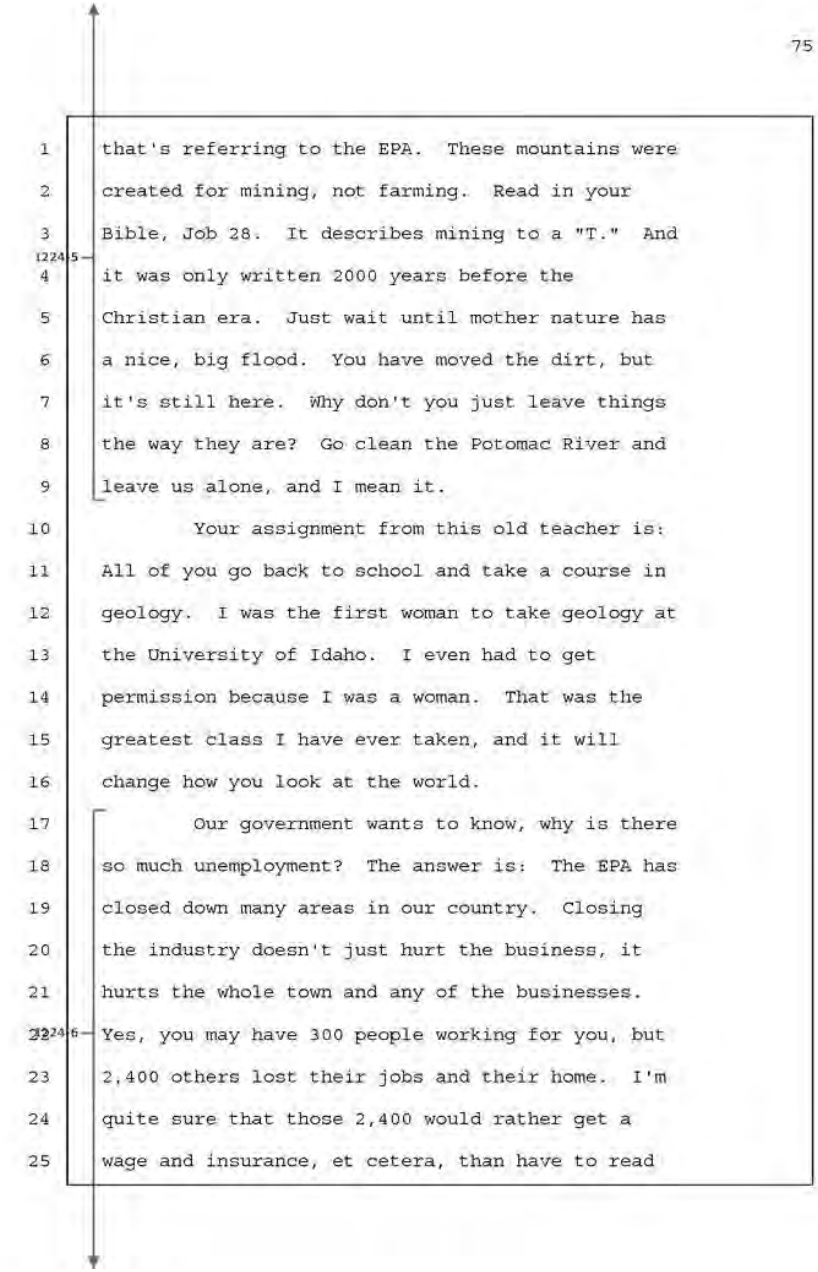
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. As described in the ROD Amendment, the levels of contamination significantly exceed acceptable state and site-specific water quality standards. As described in the response to Comment No. I295-2, EPA has sought and received considerable public involvement in the development of the Selected Remedy.

Response to comment I224-4

Comment noted.

Response to comment I224-5

Comment noted.



75

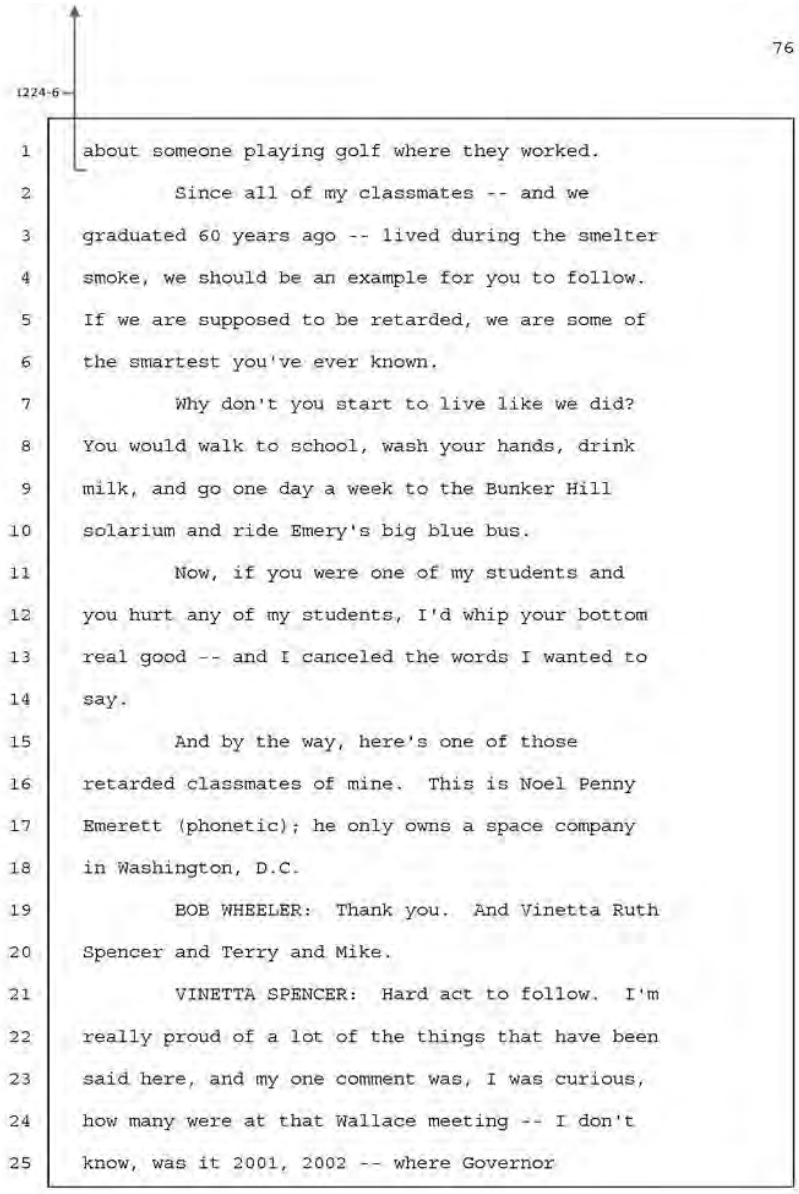
that's referring to the EPA. These mountains were created for mining, not farming. Read in your Bible, Job 28. It describes mining to a "T." And I224-5 it was only written 2000 years before the Christian era. Just wait until mother nature has a nice, big flood. You have moved the dirt, but it's still here. Why don't you just leave things the way they are? Go clean the Potomac River and leave us alone, and I mean it.

Your assignment from this old teacher is: All of you go back to school and take a course in geology. I was the first woman to take geology at the University of Idaho. I even had to get permission because I was a woman. That was the greatest class I have ever taken, and it will change how you look at the world.

Our government wants to know, why is there so much unemployment? The answer is: The EPA has closed down many areas in our country. Closing the industry doesn't just hurt the business, it hurts the whole town and any of the businesses. I224-6 Yes, you may have 300 people working for you, but 2,400 others lost their jobs and their home. I'm quite sure that those 2,400 would rather get a wage and insurance, et cetera, than have to read

Response to comment I224-6

Comment noted.



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I224-6

about someone playing golf where they worked.

Since all of my classmates -- and we graduated 60 years ago -- lived during the smelter smoke, we should be an example for you to follow. If we are supposed to be retarded, we are some of the smartest you've ever known.

Why don't you start to live like we did? You would walk to school, wash your hands, drink milk, and go one day a week to the Bunker Hill solarium and ride Emery's big blue bus.

Now, if you were one of my students and you hurt any of my students, I'd whip your bottom real good -- and I canceled the words I wanted to say.

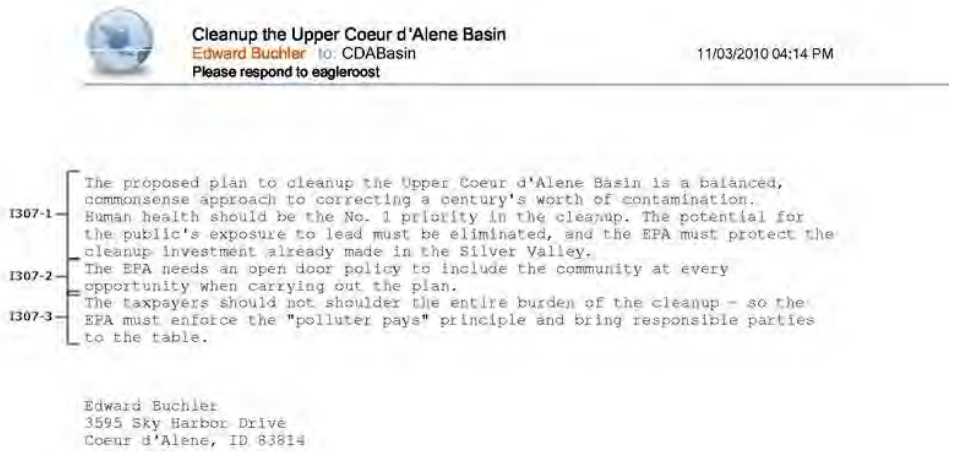
And by the way, here's one of those retarded classmates of mine. This is Noel Penny Emerett (phonetic); he only owns a space company in Washington, D.C.

BOB WHEELER: Thank you. And Vinetta Ruth Spencer and Terry and Mike.

VINETTA SPENCER: Hard act to follow. I'm really proud of a lot of the things that have been said here, and my one comment was, I was curious, how many were at that Wallace meeting -- I don't know, was it 2001, 2002 -- where Governor

No comments

Buchler, Edward, I307, Letter 614437



Cleanup the Upper Coeur d'Alene Basin
Edward Buchler to: CDABasin 11/03/2010 04:14 PM
Please respond to eagleroost

I307-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I307-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I307-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Edward Buchler
3595 Sky Harbor Drive
Coeur d'Alene, ID 83814

614437

Response to comment I307-1

See response to Comment No. I295-1.

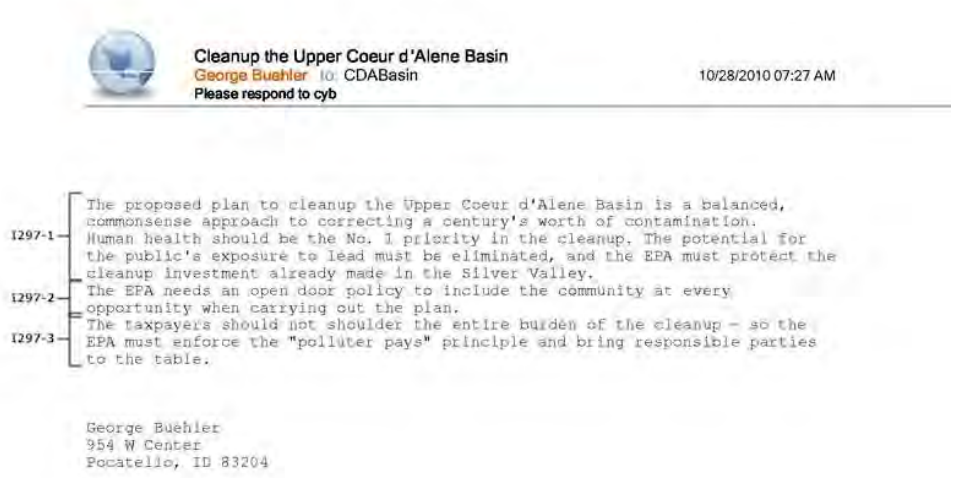
Response to comment I307-2

See response to Comment No. I295-2.

Response to comment I307-3

See response to Comment No. I295-3.

Buehler, George, I297, Letter 614427



Cleanup the Upper Coeur d'Alene Basin
George Buehler To: CDABasin
Please respond to cyb
10/28/2010 07:27 AM

I297-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I297-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I297-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

George Buehler
954 W Center
Pocatello, ID 83204

614427

Response to comment I297-1

See response to Comment No. I295-1.

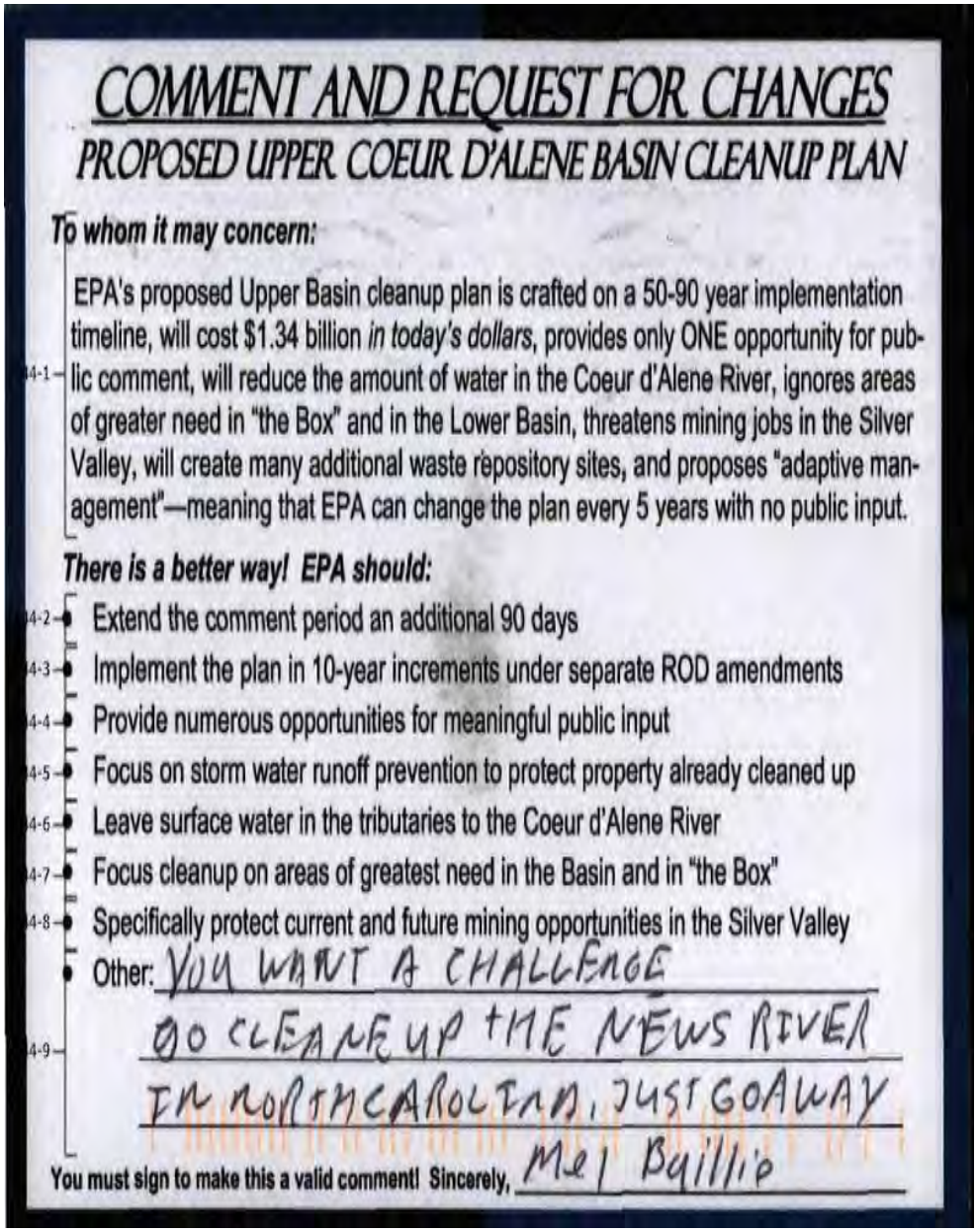
Response to comment I297-2

See response to Comment No. I295-2.

Response to comment I297-3

See response to Comment No. I295-3.

Buillip,Mel, I144, Letter 1357280



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I144-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I144-2 Extend the comment period an additional 90 days
- I144-3 Implement the plan in 10-year increments under separate ROD amendments
- I144-4 Provide numerous opportunities for meaningful public input
- I144-5 Focus on storm water runoff prevention to protect property already cleaned up
- I144-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I144-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I144-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: YOU WANT A CHALLENGE

I144-9 GO CLEAN UP THE NEWS RIVER IN NORTH CAROLINA, JUST GO AWAY

You must sign to make this a valid comment! Sincerely, Mel Buillip

Response to comment I144-1
See response to Comment No. I25-1.

Response to comment I144-2
See response to Comment No. I25-2.

Response to comment I144-3
See response to Comment No. I25-3.

Response to comment I144-4
See response to Comment No. I25-4.

Response to comment I144-5
See response to Comment No. I25-5.

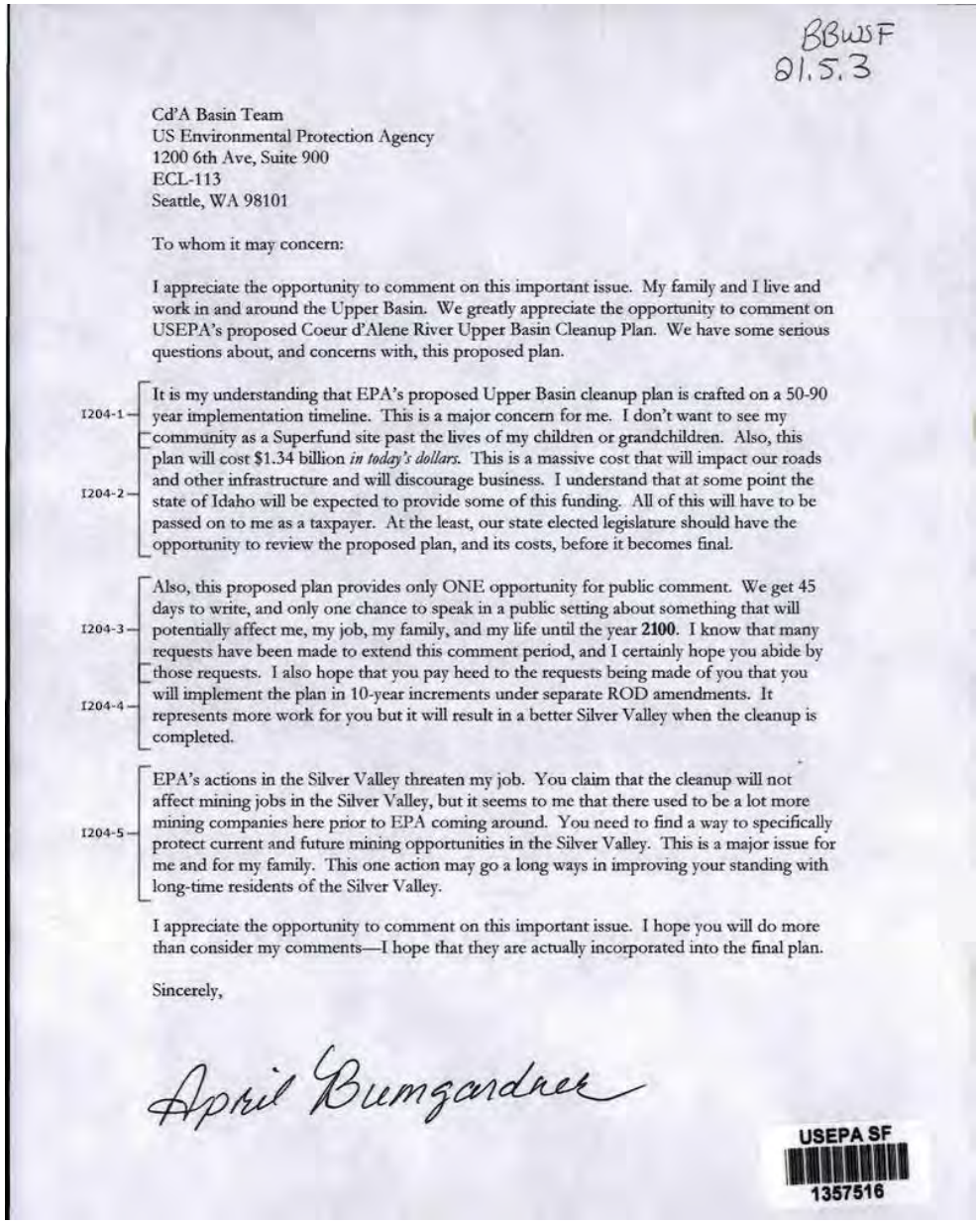
Response to comment I144-6
See response to Comment No. I25-6.

Response to comment I144-7
See response to Comment No. I25-7.

Response to comment I144-8
See response to Comment No. I25-8.

Response to comment I144-9
Comment noted.

Bumgardner, April, I204, Letter 1357516



BBWSF
01.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I204-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I204-2

I204-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I204-4

I204-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

April Bumgardner

USEPA SF
1357516

Response to comment I204-1
See response to Comment No. I58-1.

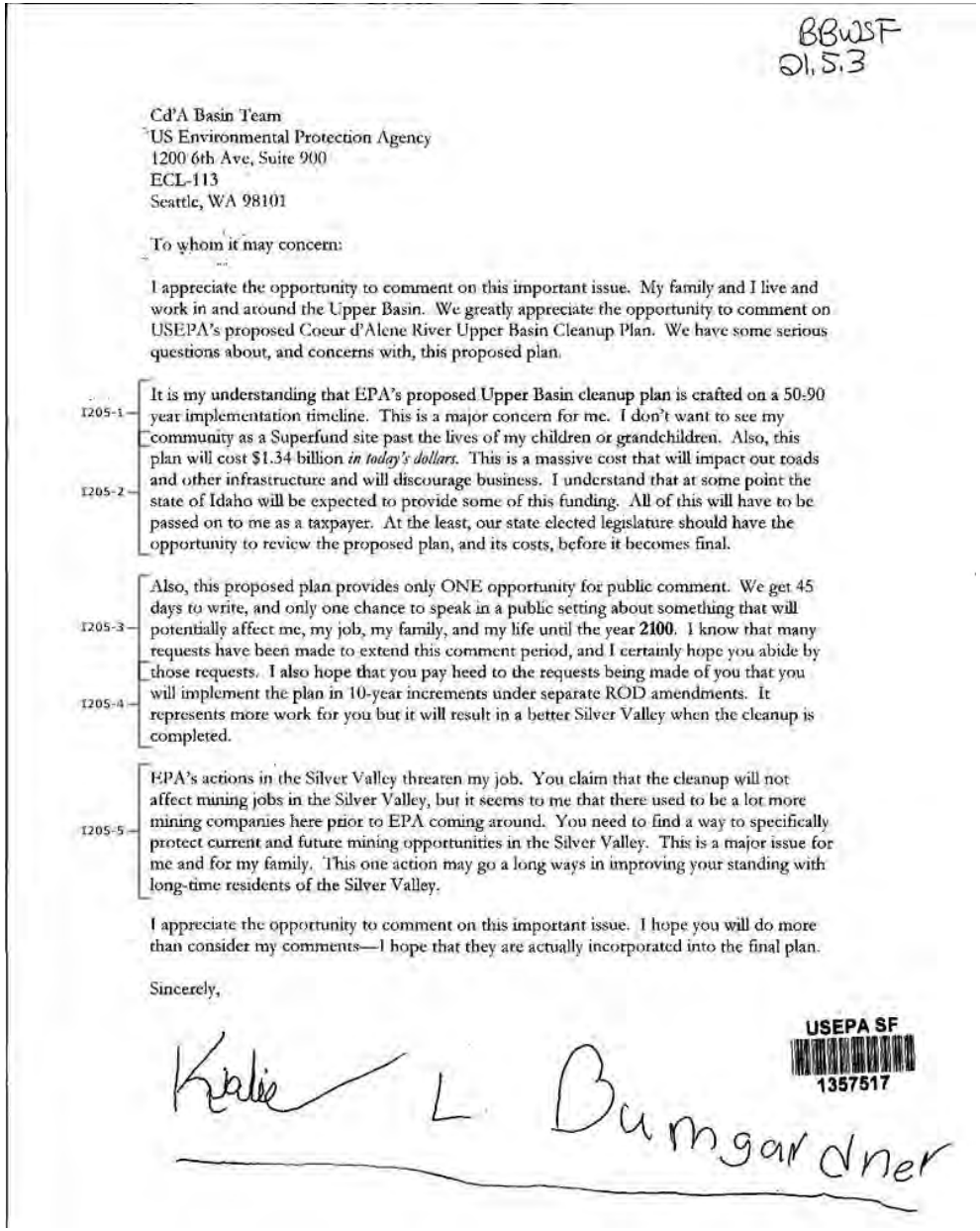
Response to comment I204-2
See response to Comment No. I58-2.

Response to comment I204-3
See response to Comment No. I58-3.

Response to comment I204-4
See response to Comment No. I58-4.

Response to comment I204-5
See response to Comment No. I58-5.

Bumgardner, Kalie L., I205, Letter 1357517



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I205-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the I205-2 state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I205-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you I205-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I205-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

USEPA SF
1357517

Kalie L Bumgardner

Response to comment I205-1
See response to Comment No. I58-1.

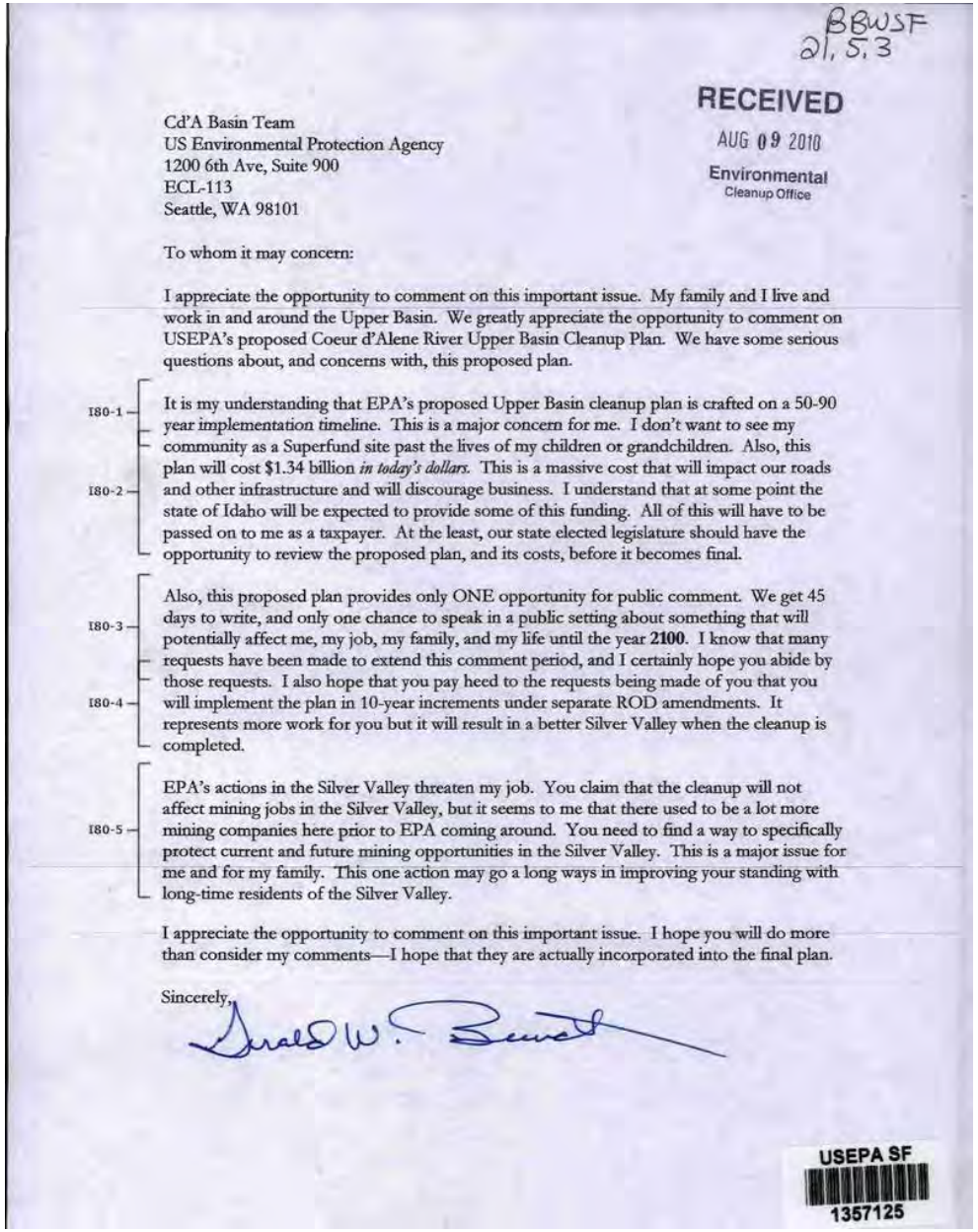
Response to comment I205-2
See response to Comment No. I58-2.

Response to comment I205-3
See response to Comment No. I58-3.

Response to comment I205-4
See response to Comment No. I58-4.

Response to comment I205-5
See response to Comment No. I58-5.

Buncs, Gerald, I80, Letter 1357125



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RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I80-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I80-2 — plan will cost $1.34 billion *in today's dollars.* This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I80-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by
I80-4 — those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I80-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Gerald W. Buncs

USEPA SF
1357125

Response to comment I80-1
See response to Comment No. I58-1.

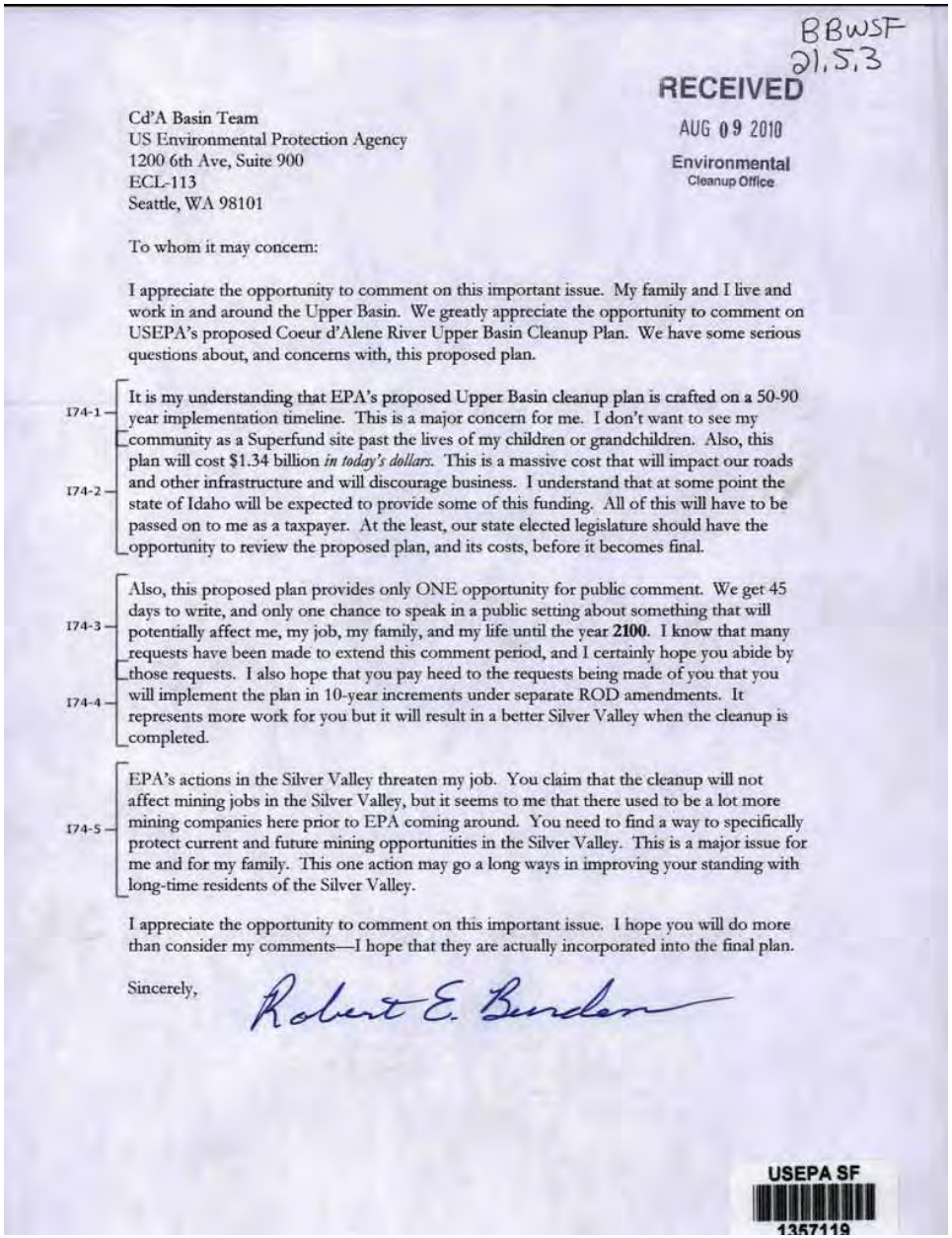
Response to comment I80-2
See response to Comment No. I58-2.

Response to comment I80-3
See response to Comment No. I58-3.

Response to comment I80-4
See response to Comment No. I58-4.

Response to comment I80-5
See response to Comment No. I58-5.

Burden, Robert, I74, Letter 1357119



BBWSF
21,5,3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
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1200 6th Ave, Suite 900
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Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I74-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I74-2

I74-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I74-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

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I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Robert E. Burden

USEPA SF
1357119

Response to comment I74-1
See response to Comment No. I58-1.

Response to comment I74-2
See response to Comment No. I58-2.

Response to comment I74-3
See response to Comment No. I58-3.

Response to comment I74-4
See response to Comment No. I58-4.

Response to comment I74-5
See response to Comment No. I58-5.

Burrows, John, I558, Letter 617560

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jburr1@yahoo.com to: formsubmission 11/17/2010 11:30 AM
Sent by: Jburr1@Yahoo.Com <jburr1=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

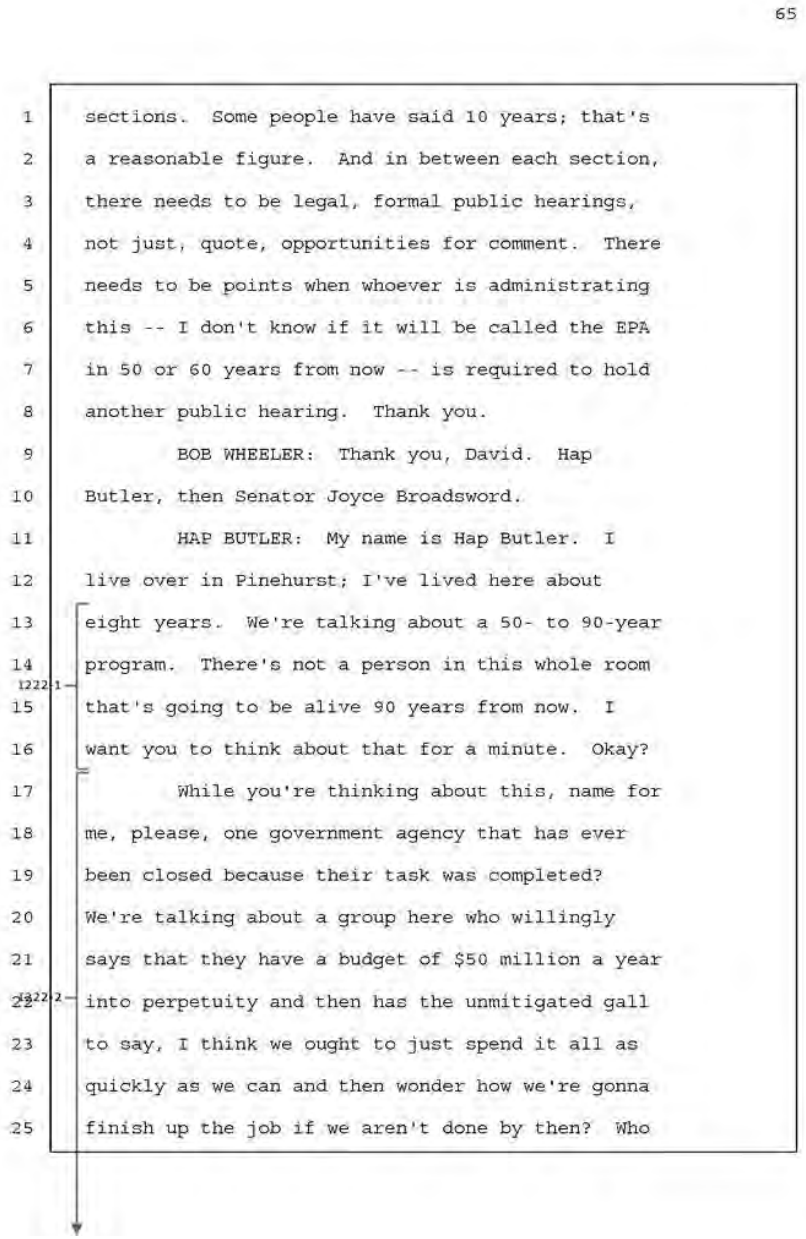
From: John Burrows
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I558-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: jburr1@yahoo.com
Mailing Address: 3220 Quartzite Dr., 3220 Quartzite Dr.|Reno|NV|89523|US
Phone Number:

617560

Response to comment I558-1

See response to Comment No. I351-1.

Butler, Hap, I222, Letter 610097-17



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sections. Some people have said 10 years; that's a reasonable figure. And in between each section, there needs to be legal, formal public hearings, not just, quote, opportunities for comment. There needs to be points when whoever is administrating this -- I don't know if it will be called the EPA in 50 or 60 years from now -- is required to hold another public hearing. Thank you.

BOB WHEELER: Thank you, David. Hap Butler, then Senator Joyce Broadsword.

HAP BUTLER: My name is Hap Butler. I live over in Pinehurst; I've lived here about eight years. We're talking about a 50- to 90-year program. There's not a person in this whole room that's going to be alive 90 years from now. I want you to think about that for a minute. Okay?

I222-1

While you're thinking about this, name for me, please, one government agency that has ever been closed because their task was completed? We're talking about a group here who willingly says that they have a budget of $50 million a year into perpetuity and then has the unmitigated gall to say, I think we ought to just spend it all as quickly as we can and then wonder how we're gonna finish up the job if we aren't done by then? Who

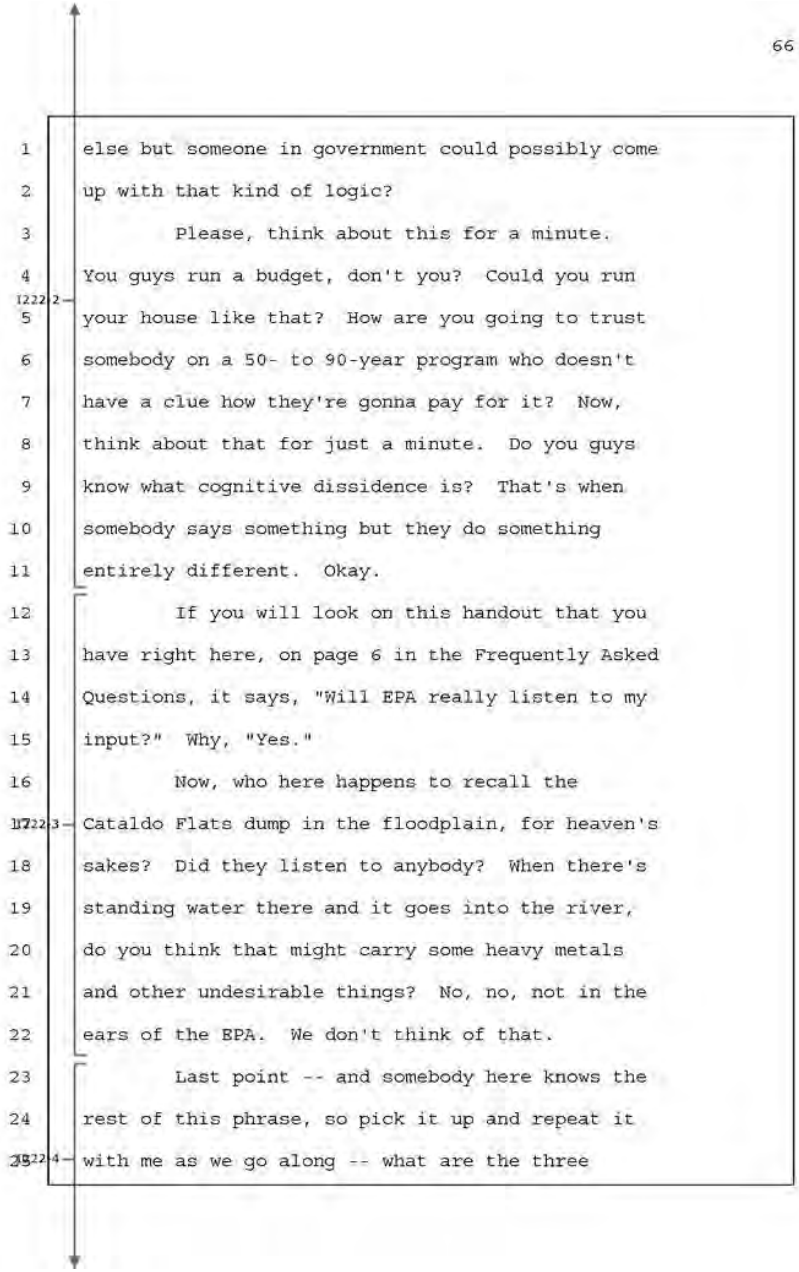
I222-2

Response to comment I222-1

See response to Comment No. I58-1.

Response to comment I222-2

See responses to Comment Nos. I58-1 and I58-2.



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else but someone in government could possibly come up with that kind of logic?

Please, think about this for a minute. You guys run a budget, don't you? Could you run I222-2 your house like that? How are you going to trust somebody on a 50- to 90-year program who doesn't have a clue how they're gonna pay for it? Now, think about that for just a minute. Do you guys know what cognitive dissidence is? That's when somebody says something but they do something entirely different. Okay.

If you will look on this handout that you have right here, on page 6 in the Frequently Asked Questions, it says, "Will EPA really listen to my input?" Why, "Yes."

Now, who here happens to recall the I222-3 Cataldo Flats dump in the floodplain, for heaven's sakes? Did they listen to anybody? When there's standing water there and it goes into the river, do you think that might carry some heavy metals and other undesirable things? No, no, not in the ears of the EPA. We don't think of that.

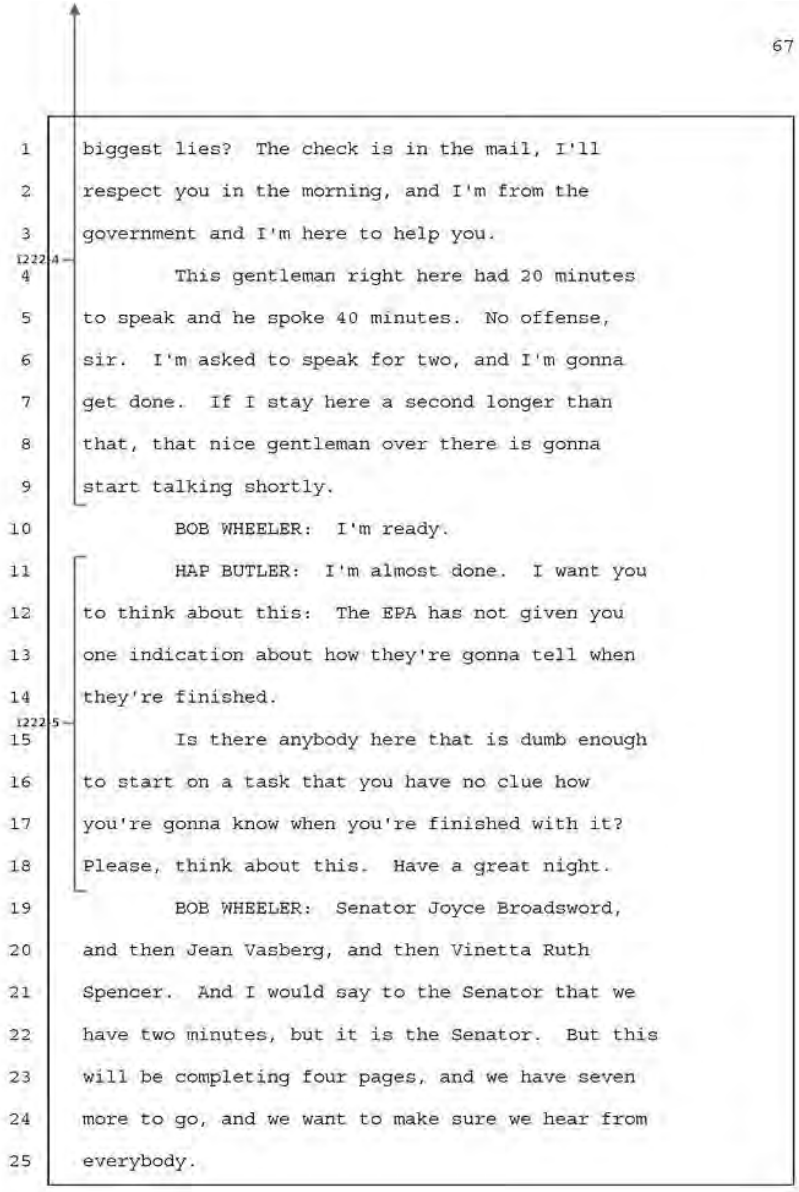
Last point -- and somebody here knows the rest of this phrase, so pick it up and repeat it I222-4 with me as we go along -- what are the three

Response to comment I222-3

EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of our work. Most importantly, we have encouraged the public to provide comments and input on remedy selection. With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT over the last several years, EPA developed a logical and transparent prioritization process for cleanup actions. Using this prioritization process, the Selected Remedy, an interim action, focuses on a prioritized set of cleanup actions. The actions include the most contaminated drainages (i.e., Ninemile and Canyon Creeks), areas that have the greatest adverse impact on groundwater and surface water (e.g., OU 2), and areas that provide protection for existing remedies.

Response to comment I222-4

Comment noted.



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biggest lies? The check is in the mail, I'll respect you in the morning, and I'm from the government and I'm here to help you.

I222-4

This gentleman right here had 20 minutes to speak and he spoke 40 minutes. No offense, sir. I'm asked to speak for two, and I'm gonna get done. If I stay here a second longer than that, that nice gentleman over there is gonna start talking shortly.

BOB WHEELER: I'm ready.

HAP BUTLER: I'm almost done. I want you to think about this: The EPA has not given you one indication about how they're gonna tell when they're finished.

I222-5

Is there anybody here that is dumb enough to start on a task that you have no clue how you're gonna know when you're finished with it? Please, think about this. Have a great night.

BOB WHEELER: Senator Joyce Broadsword, and then Jean Vasberg, and then Vinetta Ruth Spencer. And I would say to the Senator that we have two minutes, but it is the Senator. But this will be completing four pages, and we have seven more to go, and we want to make sure we hear from everybody.

Response to comment I222-5

See response Comment No. I58-1.

Butler, Hap, I263, Letter 616015-26

right now as we are talking because they are farmers and their water's been taken away from them. I know that water is important to this valley. I know it's important to mining and I do not want to see a bureaucratic system come in and basically run at least my friends and my family out of work. I just returned to this community about three weeks ago. I'm going to live here. I'm going to stay here and I've seen the devastation that the EPA caused in California and there is no [need for us]. They say they listen. These farmers have been begging for water and they haven't gotten it. They don't listen. They don't care. 1200 Pennsylvania Avenue is too far away from this part of the world. We need them out of here and controlled by the local government. That's it.

Hap Butler: My name is Hap Butler. I live in Pinehurst. Thank you, Senator Crapo, for calling this county hall meeting. Thank you, Governor Otter, for coming up here from Boise. I know it took time out of your day, and thank you, Chief Allan, for coming to be with us. I appreciate that more than you might imagine. Mr. Opalski, I expect the people might be a less cynical but the EPA's going just to listen to our comments and concerns. If we ever say the EPA pay any attention to anything anybody has ever said – I give you the example, the toxic waste site that you dumped out of here on the Cataldo Flat despite considerable opposition from this community. You didn't listen to a single thing that we said. [Applause] Now does that tell us how you listen to anything else we say? I just wonder about that. Senator Crapo, as Senator Risch so correctly pointed out, the EPA has not proposed how to wind down in their project here rather, they are coming back with a proposal that say two to three times [at longs] they've already been here so far. Nothing! Absolutely nothing lasts forever with the exception of an unelected federal agency. I urge you, Senator, and Governor, to do every single thing in your power to show the EPA the clearly marked exit from the Silver Valley and [the can]. They're not going to do anything further here. They run this like a business. They come forward with benchmarks. They come forward with time pranks and they keep them reasonable and they keep them affordable. Thank you.

I263-1

I263-2

I263-3

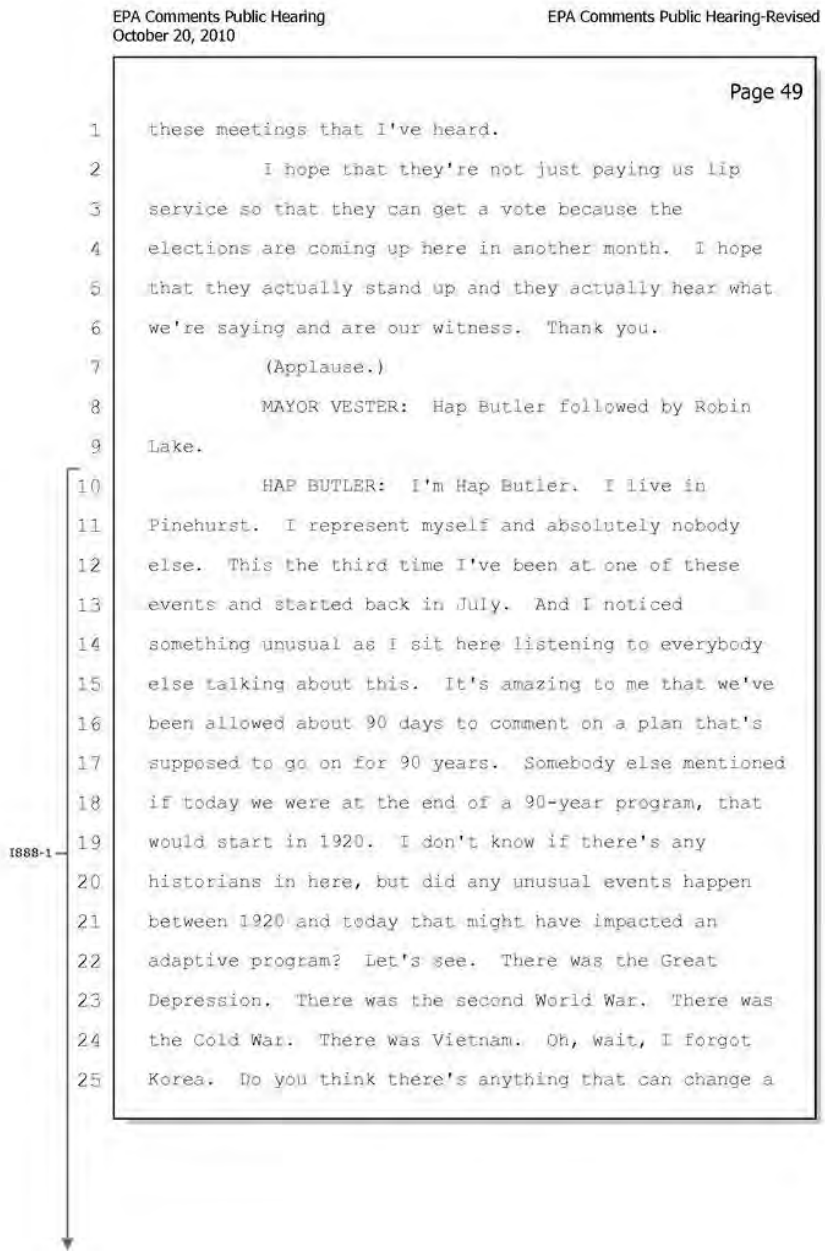
Bill Mooney: Yes, my name is Bill Mooney.

Response to comment I263-1
See response to Comment No. LC21-9

Response to comment I263-2
See response to Comment No. I58-1.

Response to comment I263-3
Comment noted.

Butler, Hap, I888, Letter 619651-19



EPA Comments Public Hearing
October 20, 2010

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these meetings that I've heard.

I hope that they're not just paying us lip service so that they can get a vote because the elections are coming up here in another month. I hope that they actually stand up and they actually hear what we're saying and are our witness. Thank you.

(Applause.)

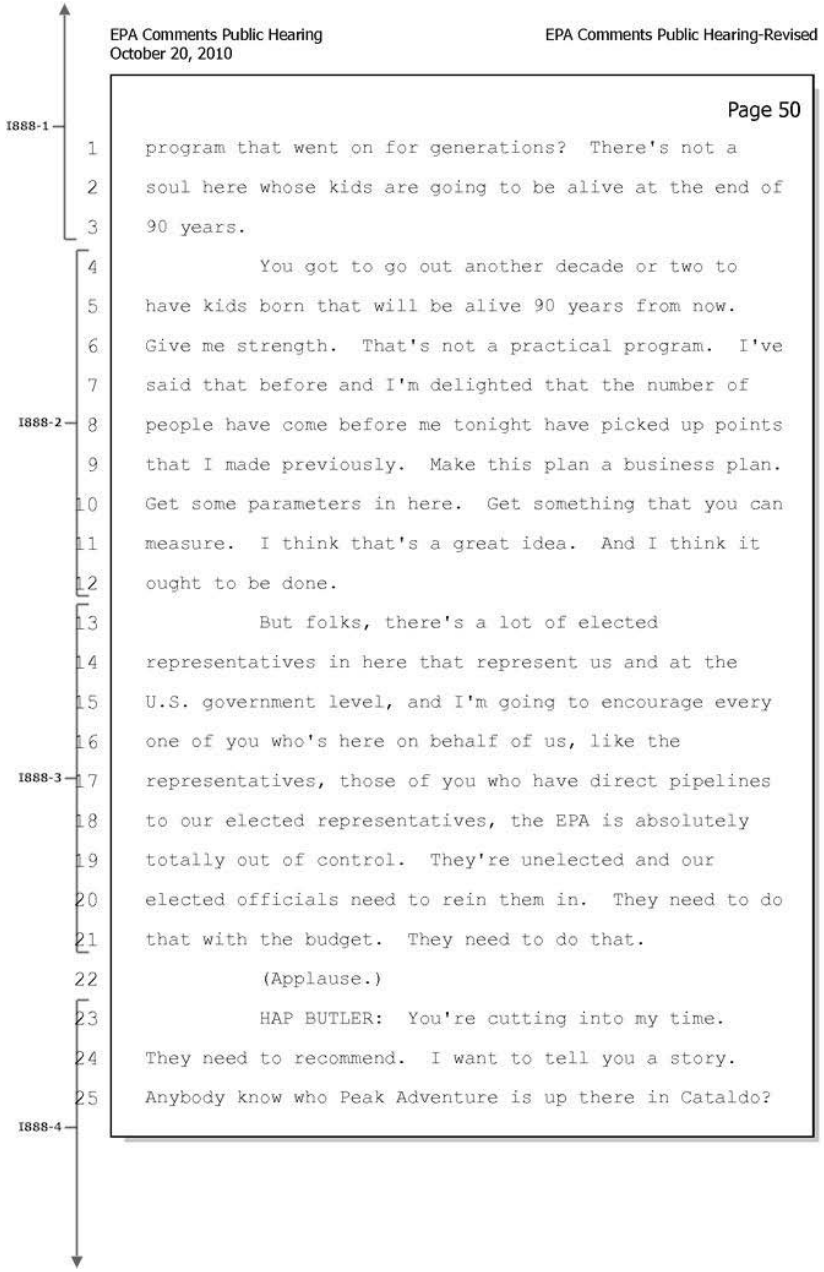
MAYOR VESTER: Hap Butler followed by Robin Lake.

HAP BUTLER: I'm Hap Butler. I live in Pinehurst. I represent myself and absolutely nobody else. This the third time I've been at one of these events and started back in July. And I noticed something unusual as I sit here listening to everybody else talking about this. It's amazing to me that we've been allowed about 90 days to comment on a plan that's supposed to go on for 90 years. Somebody else mentioned if today we were at the end of a 90-year program, that would start in 1920. I don't know if there's any historians in here, but did any unusual events happen between 1920 and today that might have impacted an adaptive program? Let's see. There was the Great Depression. There was the second World War. There was the Cold War. There was Vietnam. Oh, wait, I forgot Korea. Do you think there's anything that can change a

I888-1

Response to comment I888-1

See responses to Comment Nos. I58-1 and I54-6.



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I888-1

program that went on for generations? There's not a soul here whose kids are going to be alive at the end of 90 years.

You got to go out another decade or two to have kids born that will be alive 90 years from now. Give me strength. That's not a practical program. I've said that before and I'm delighted that the number of

I888-2

people have come before me tonight have picked up points that I made previously. Make this plan a business plan. Get some parameters in here. Get something that you can measure. I think that's a great idea. And I think it ought to be done.

But folks, there's a lot of elected representatives in here that represent us and at the U.S. government level, and I'm going to encourage every one of you who's here on behalf of us, like the

I888-3

representatives, those of you who have direct pipelines to our elected representatives, the EPA is absolutely totally out of control. They're unelected and our elected officials need to rein them in. They need to do that with the budget. They need to do that.

(Applause.)

HAP BUTLER: You're cutting into my time. They need to recommend. I want to tell you a story. Anybody know who Peak Adventure is up there in Cataldo?

I888-4

Response to comment I888-2

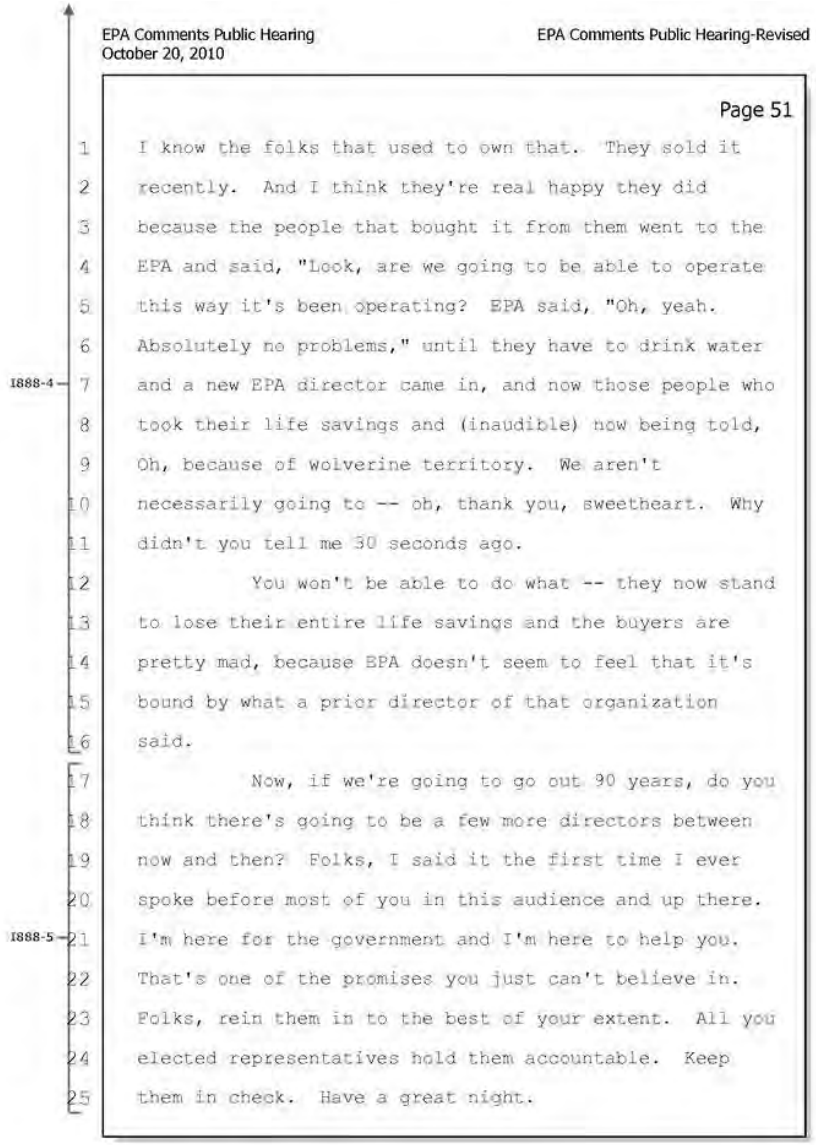
EPA along with other state and federal agencies have developed environmental metrics to measure progress toward completion of the cleanup. See response to Comment No. I58-1 regarding duration of the Selected Remedy.

Response to comment I888-3

Comment noted.

Response to comment I888-4

Comment noted.



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October 20, 2010

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I know the folks that used to own that. They sold it recently. And I think they're real happy they did because the people that bought it from them went to the EPA and said, "Look, are we going to be able to operate this way it's been operating? EPA said, "Oh, yeah. Absolutely no problems," until they have to drink water
I888-4 and a new EPA director came in, and now those people who took their life savings and (inaudible) now being told, Oh, because of Wolverine territory. We aren't necessarily going to -- oh, thank you, sweetheart. Why didn't you tell me 30 seconds ago.

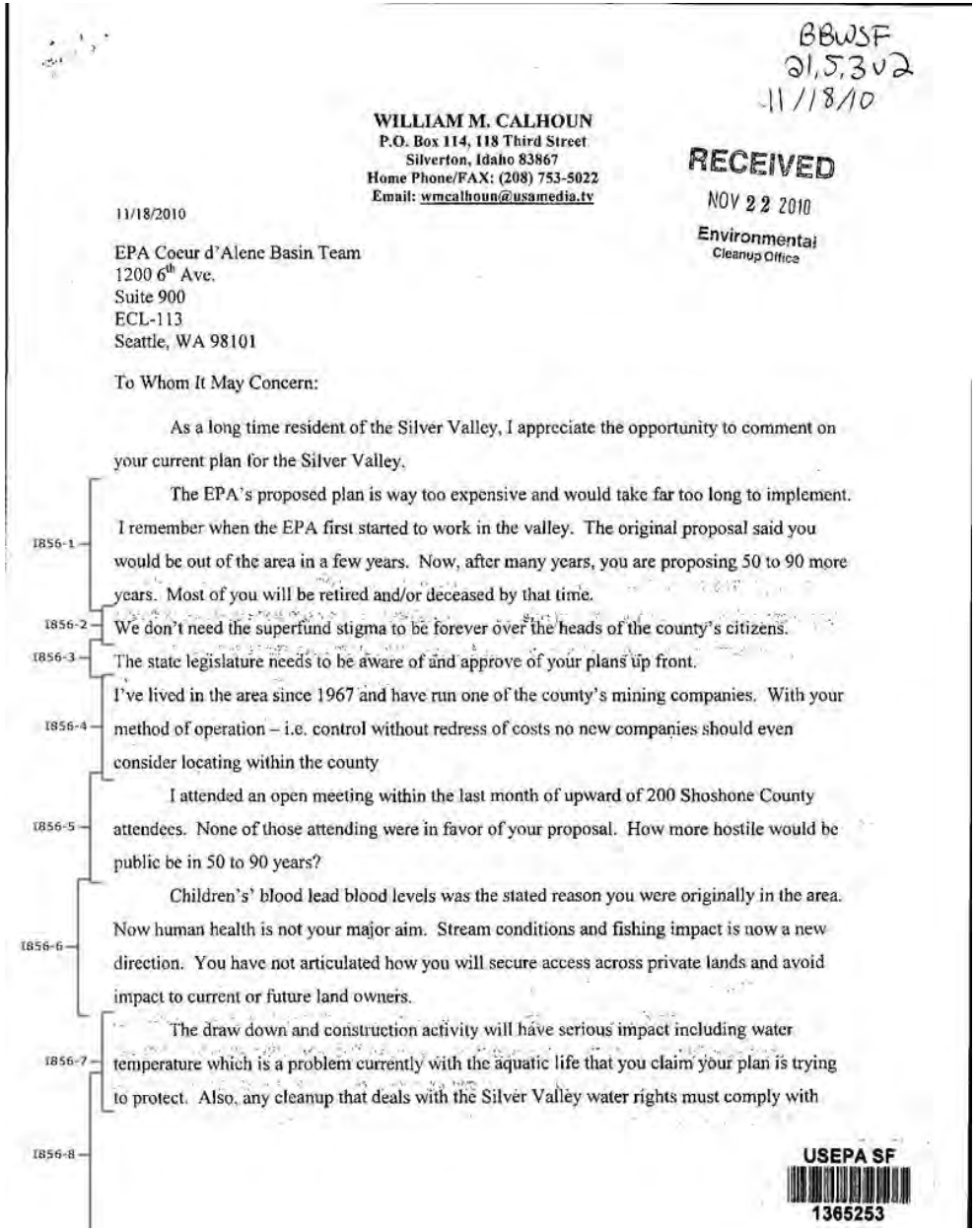
You won't be able to do what -- they now stand to lose their entire life savings and the buyers are pretty mad, because EPA doesn't seem to feel that it's bound by what a prior director of that organization said.

Now, if we're going to go out 90 years, do you think there's going to be a few more directors between now and then? Folks, I said it the first time I ever spoke before most of you in this audience and up there.
I888-5 I'm here for the government and I'm here to help you. That's one of the promises you just can't believe in. Folks, rein them in to the best of your extent. All you elected representatives hold them accountable. Keep them in check. Have a great night.

Response to comment I888-5

Thank you for your comment.

Calhoun, William M., I856, Letter 1365253



BBWSF
21,5,3v2
11/18/10

WILLIAM M. CALHOUN
P.O. Box 114, 118 Third Street
Silverton, Idaho 83867
Home Phone/FAX: (208) 753-5022
Email: wmcalhoun@usamedia.tv

RECEIVED
NOV 22 2010
Environmental
Cleanup Office

11/18/2010

EPA Coeur d'Alene Basin Team
1200 6th Ave.
Suite 900
ECL-113
Seattle, WA 98101

To Whom It May Concern:

As a long time resident of the Silver Valley, I appreciate the opportunity to comment on your current plan for the Silver Valley.

The EPA's proposed plan is way too expensive and would take far too long to implement. I remember when the EPA first started to work in the valley. The original proposal said you would be out of the area in a few years. Now, after many years, you are proposing 50 to 90 more years. Most of you will be retired and/or deceased by that time. I856-1

We don't need the superfund stigma to be forever over the heads of the county's citizens. I856-2

The state legislature needs to be aware of and approve of your plans up front. I856-3

I've lived in the area since 1967 and have run one of the county's mining companies. With your method of operation – i.e. control without redress of costs no new companies should even consider locating within the county I856-4

I attended an open meeting within the last month of upward of 200 Shoshone County attendees. None of those attending were in favor of your proposal. How more hostile would be public be in 50 to 90 years? I856-5

Children's' blood lead blood levels was the stated reason you were originally in the area. Now human health is not your major aim. Stream conditions and fishing impact is now a new direction. You have not articulated how you will secure access across private lands and avoid impact to current or future land owners. I856-6

The draw down and construction activity will have serious impact including water temperature which is a problem currently with the aquatic life that you claim your plan is trying to protect. Also, any cleanup that deals with the Silver Valley water rights must comply with I856-7

I856-8

USEPA SF
1365253

Response to comment I856-1
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I856-2
See response to Comment No. I474-1.

Response to comment I856-3
See response to Comment No. LJ39-5.

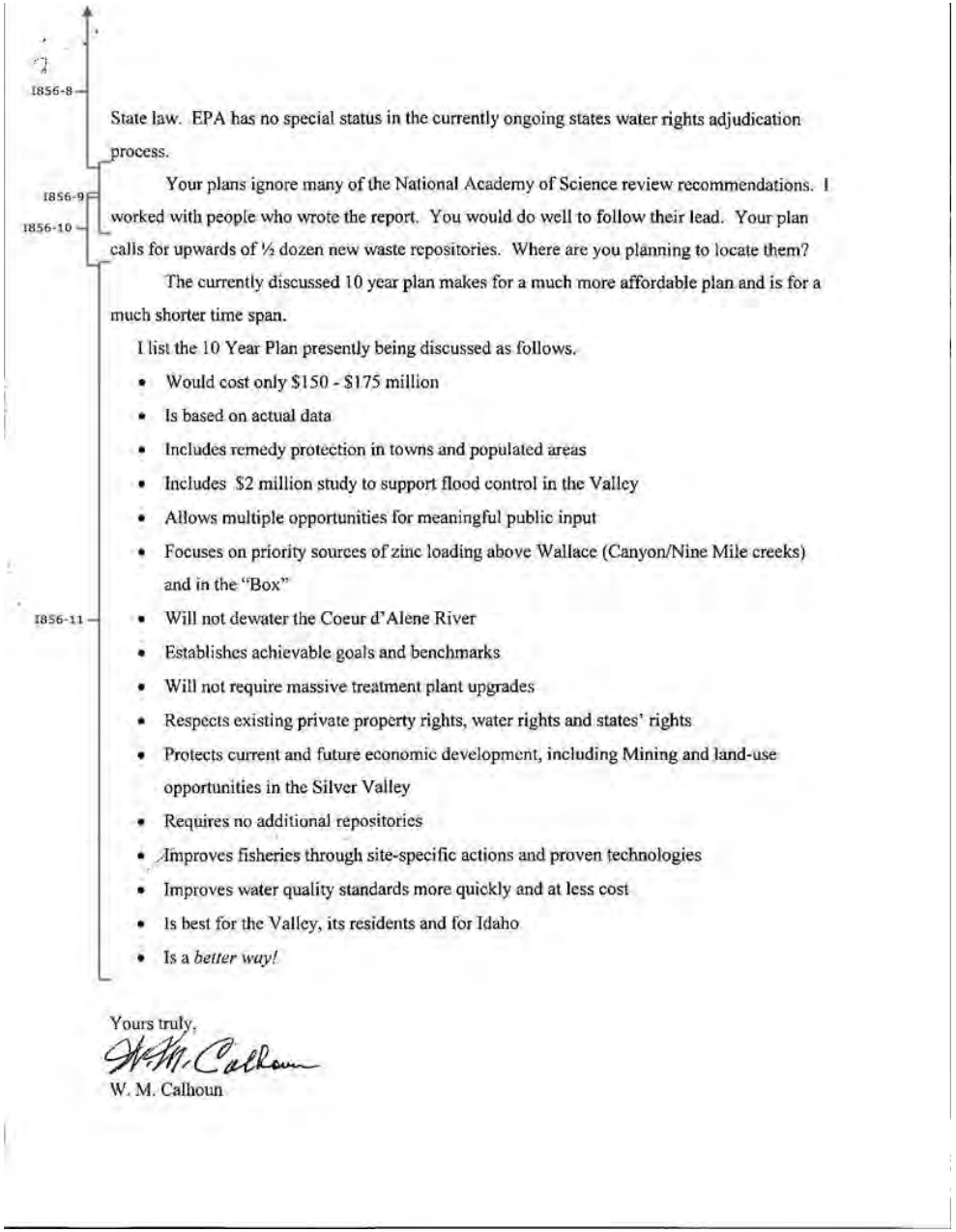
Response to comment I856-4
See response to Comment No. I58-5.

Response to comment I856-5
Comment noted.

Response to comment I856-6
Although significant cleanup has taken place in the Upper Basin that has focused on risks to human health, EPA also has the responsibility to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect the environment. Contamination is still present in site soil, sediments, groundwater, and surface water that pose risks to people, wildlife, fish, and the environment. EPA will work with owners of private party to secure access by agreement and anticipates that it will be able to obtain access consensually. In addition, EPA intends to work with private property owners to minimize impacts to their use and enjoyment of property.

Response to comment I856-7
See responses to comments Nos. LC33-10 and I54-8.

Response to comment I856-8
See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.



I856-8

State law. EPA has no special status in the currently ongoing states water rights adjudication process.

I856-9

Your plans ignore many of the National Academy of Science review recommendations. I worked with people who wrote the report. You would do well to follow their lead. Your plan

I856-10

calls for upwards of ½ dozen new waste repositories. Where are you planning to locate them?

The currently discussed 10 year plan makes for a much more affordable plan and is for a much shorter time span.

I list the 10 Year Plan presently being discussed as follows.

- Would cost only $150 - $175 million
- Is based on actual data
- Includes remedy protection in towns and populated areas
- Includes $2 million study to support flood control in the Valley
- Allows multiple opportunities for meaningful public input
- Focuses on priority sources of zinc loading above Wallace (Canyon/Nine Mile creeks) and in the "Box"

I856-11

- Will not dewater the Coeur d'Alene River
- Establishes achievable goals and benchmarks
- Will not require massive treatment plant upgrades
- Respects existing private property rights, water rights and states' rights
- Protects current and future economic development, including Mining and land-use opportunities in the Silver Valley
- Requires no additional repositories
- Improves fisheries through site-specific actions and proven technologies
- Improves water quality standards more quickly and at less cost
- Is best for the Valley, its residents and for Idaho
- Is a *better way!*

Yours truly,

W. M. Calhoun

Response to comment I856-9

See response to Comment No. LJ27-8.

Response to comment I856-10

See response to Comment No. I54-3.

Response to comment I856-11

See response to Comment No. I474-2.

Callicrate, Thomas, I559, Letter 617561

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mtngold@Charter.net to formsubmission 11/17/2010 06:26 PM
Sent by: mtngold@Charter.net <mtngold=Charter.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Thomas Callicrate
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: mtngold@Charter.net
Mailing Address: PO Box 21146|Reno|NV|89515|US
Phone Number:

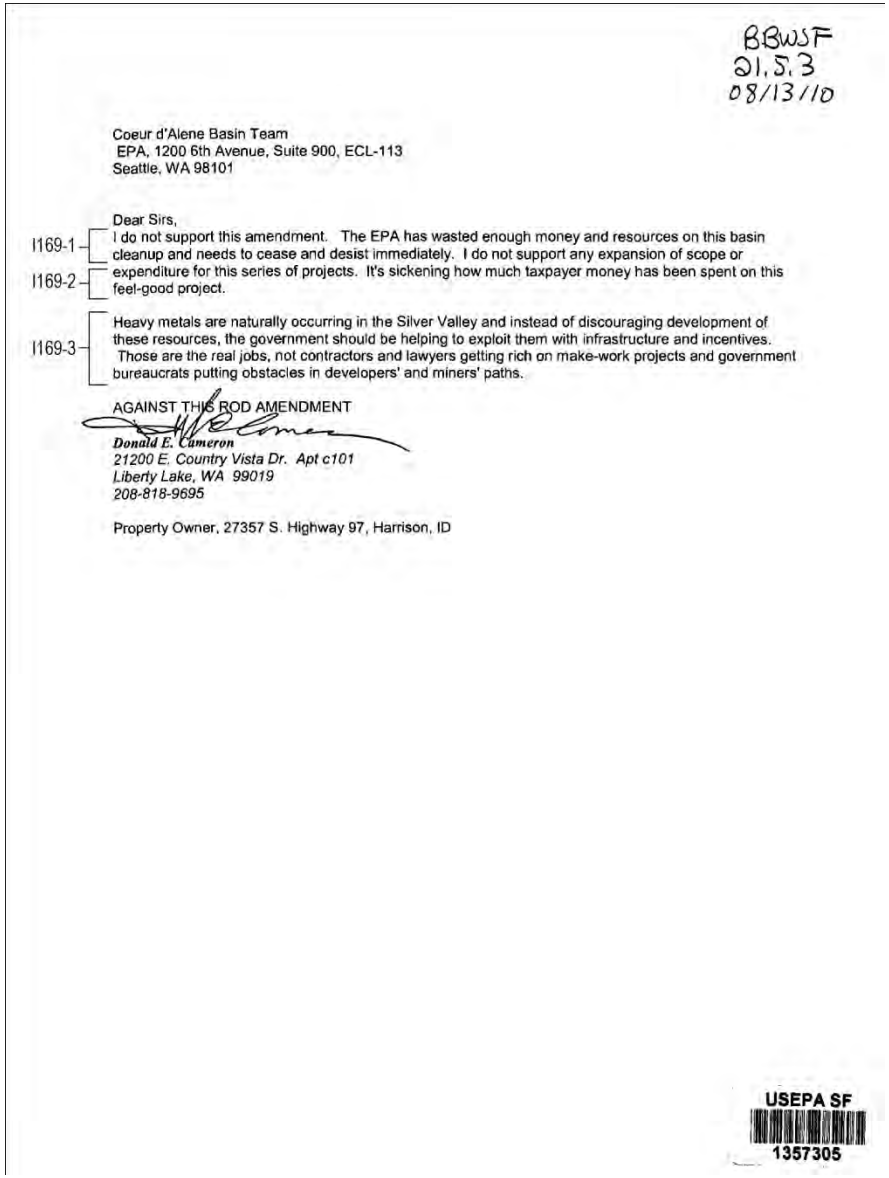
I559-1

617561

Response to comment I559-1

See response to Comment No. I351-1.

Cameron, Donald, I169, Letter 1357305



BBWSF
21.5.3
08/13/10

Coeur d'Alene Basin Team
EPA, 1200 6th Avenue, Suite 900, ECL-113
Seattle, WA 98101

Dear Sirs,

I169-1 I do not support this amendment. The EPA has wasted enough money and resources on this basin cleanup and needs to cease and desist immediately. I do not support any expansion of scope or

I169-2 expenditure for this series of projects. It's sickening how much taxpayer money has been spent on this feel-good project.

I169-3 Heavy metals are naturally occurring in the Silver Valley and instead of discouraging development of these resources, the government should be helping to exploit them with infrastructure and incentives. Those are the real jobs, not contractors and lawyers getting rich on make-work projects and government bureaucrats putting obstacles in developers' and miners' paths.

AGAINST THIS ROD AMENDMENT

Donald E. Cameron
21200 E. Country Vista Dr. Apt c101
Liberty Lake, WA 99019
208-818-9695

Property Owner, 27357 S. Highway 97, Harrison, ID

USEPA SF
1357305

Response to comment I169-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. See responses to Comment Nos. I58-1 and I58-2.

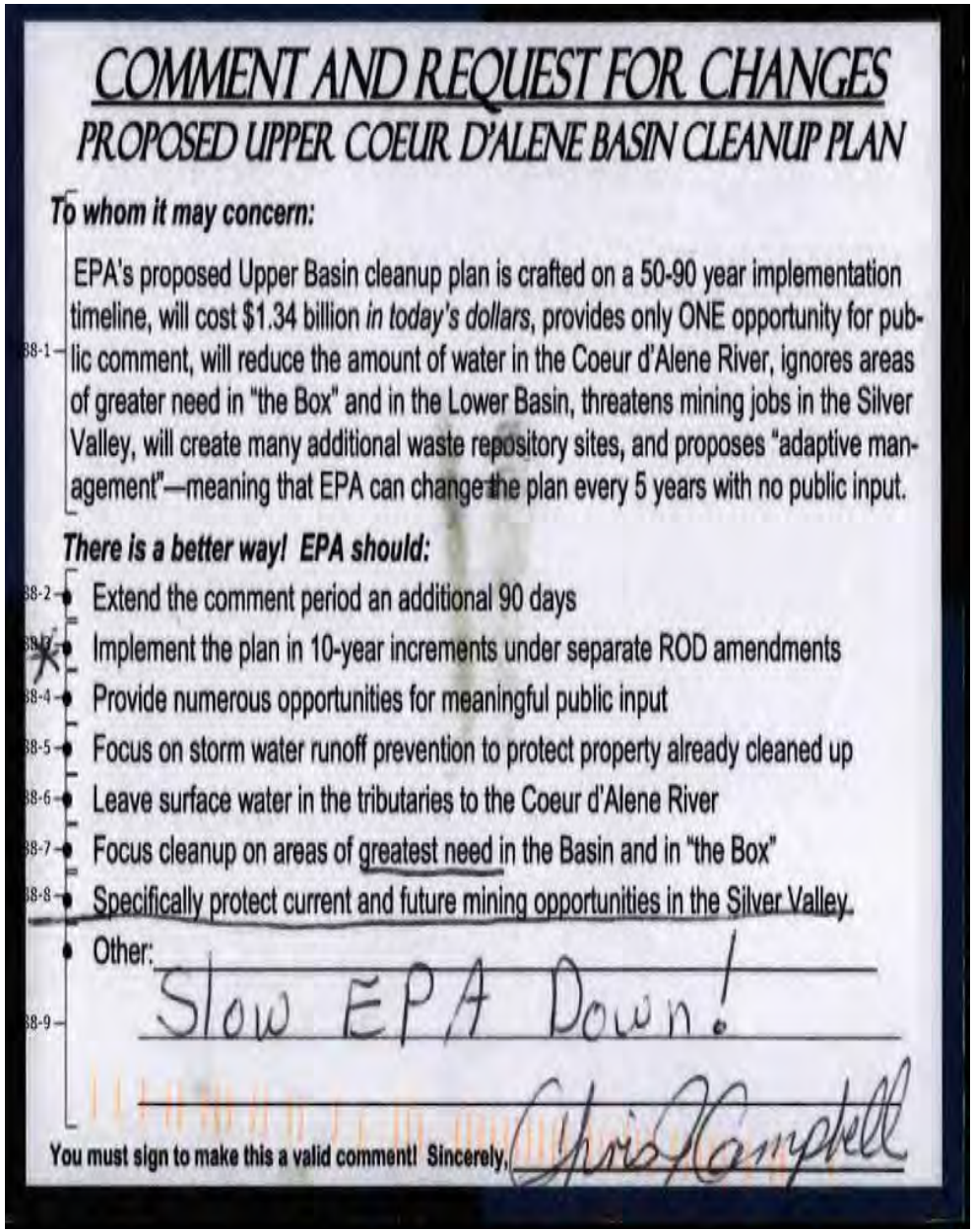
Response to comment I169-2

Comment noted. See response to Comment No. I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan.

Response to comment I169-3

EPA and other agencies have done many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. See response to Comment No. I58-5.

Campbell, Chris, I188, Letter 1357500



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I88-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I88-2 Extend the comment period an additional 90 days
- I88-3 Implement the plan in 10-year increments under separate ROD amendments
- I88-4 Provide numerous opportunities for meaningful public input
- I88-5 Focus on storm water runoff prevention to protect property already cleaned up
- I88-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I88-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I88-8 Specifically protect current and future mining opportunities in the Silver Valley.
- Other: Slow EPA Down!

I88-9

You must sign to make this a valid comment! Sincerely, Chris Campbell

Response to comment I188-1
See response to Comment No. I25-1.

Response to comment I188-2
See response to Comment No. I25-2.

Response to comment I188-3
See response to Comment No. I25-3.

Response to comment I188-4
See response to Comment No. I25-4.

Response to comment I188-5
See response to Comment No. I25-5.

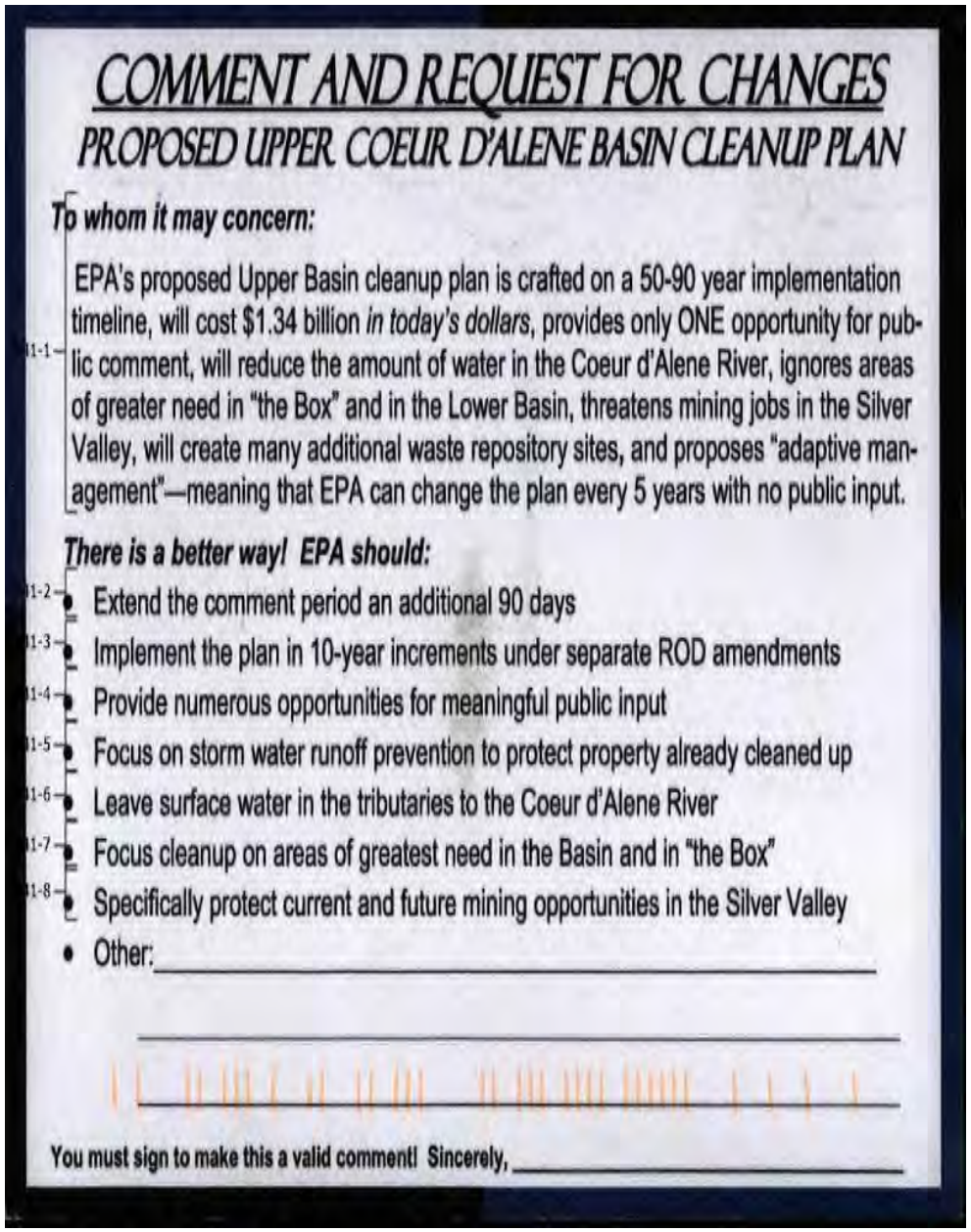
Response to comment I188-6
See response to Comment No. I25-6.

Response to comment I188-7
See response to Comment No. I25-7.

Response to comment I188-8
See response to Comment No. I25-8.

Response to comment I188-9
Comment noted.

Campbell, Jim, I141, Letter 1357277



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I141-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I141-2 Extend the comment period an additional 90 days
- I141-3 Implement the plan in 10-year increments under separate ROD amendments
- I141-4 Provide numerous opportunities for meaningful public input
- I141-5 Focus on storm water runoff prevention to protect property already cleaned up
- I141-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I141-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I141-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I141-1
See response to Comment No. I25-1.

Response to comment I141-2
See response to Comment No. I25-2.

Response to comment I141-3
See response to Comment No. I25-3.

Response to comment I141-4
See response to Comment No. I25-4.

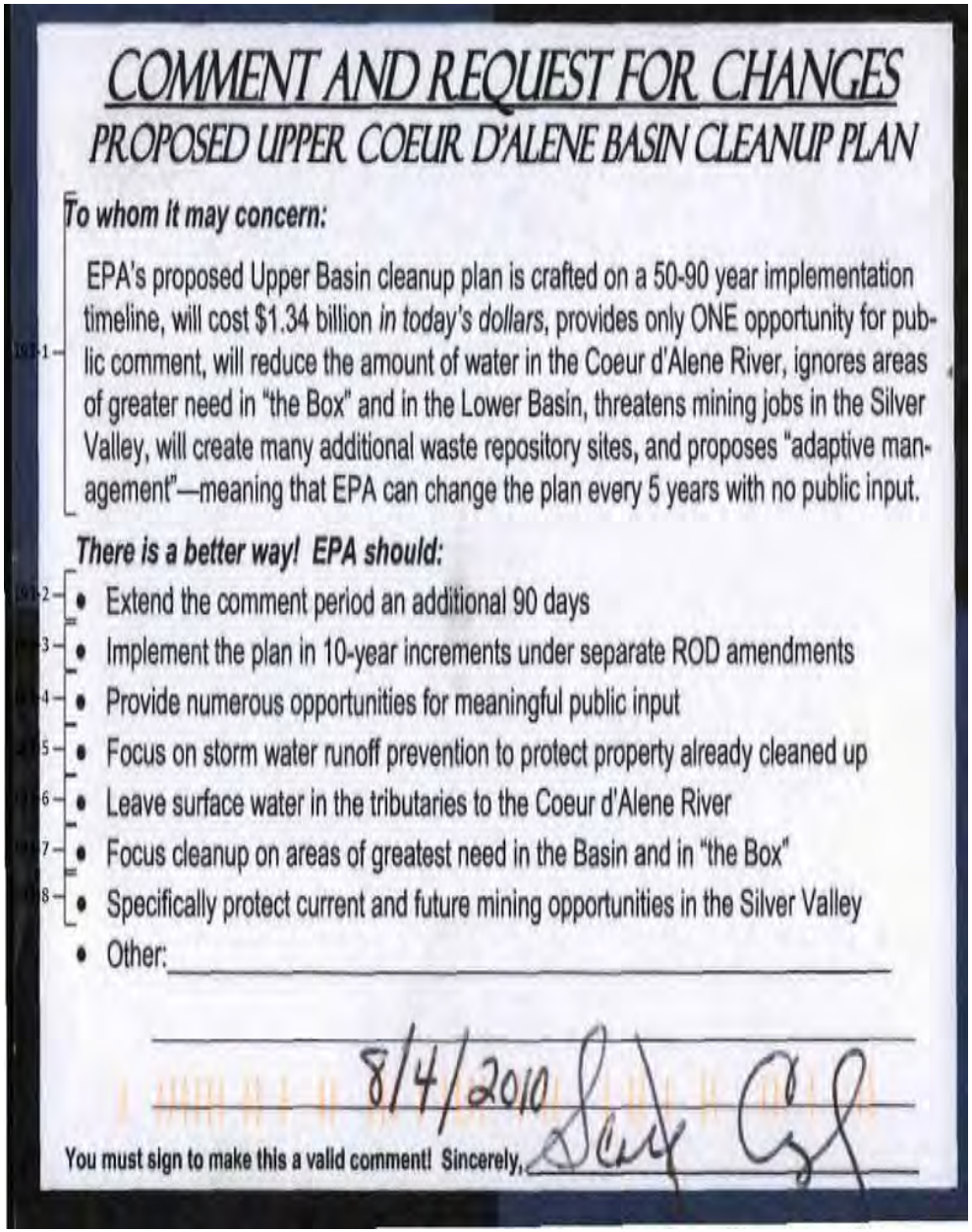
Response to comment I141-5
See response to Comment No. I25-5.

Response to comment I141-6
See response to Comment No. I25-6.

Response to comment I141-7
See response to Comment No. I25-7.

Response to comment I141-8
See response to Comment No. I25-8.

Campbell, Scott T., I93, Letter 1357140



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I93-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I93-2 • Extend the comment period an additional 90 days
I93-3 • Implement the plan in 10-year increments under separate ROD amendments
I93-4 • Provide numerous opportunities for meaningful public input
I93-5 • Focus on storm water runoff prevention to protect property already cleaned up
I93-6 • Leave surface water in the tributaries to the Coeur d'Alene River
I93-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
I93-8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other: _____

8/4/2010

You must sign to make this a valid comment! Sincerely, _____

Response to comment I93-1
See response to Comment No. I25-1.

Response to comment I93-2
See response to Comment No. I25-2.

Response to comment I93-3
See response to Comment No. I25-3.

Response to comment I93-4
See response to Comment No. I25-4.

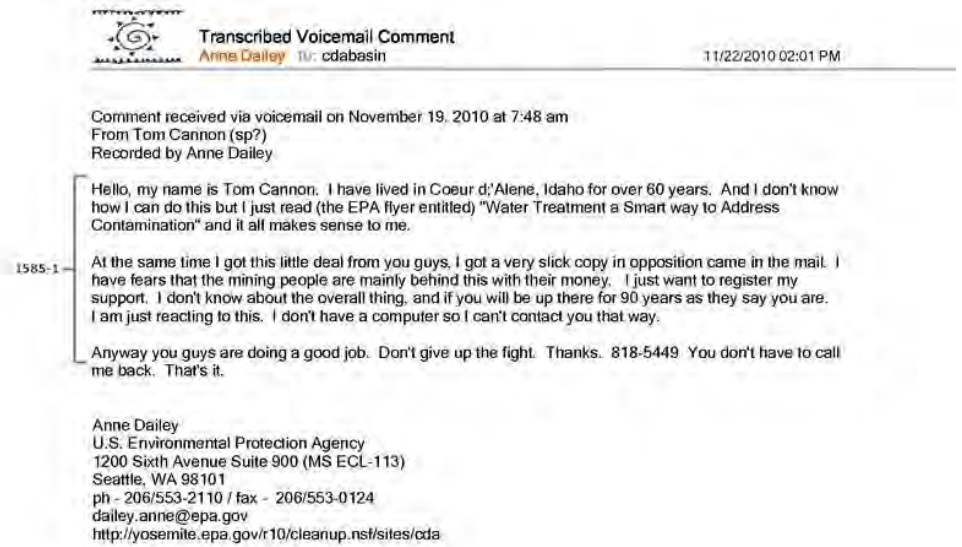
Response to comment I93-5
See response to Comment No. I25-5.

Response to comment I93-6
See response to Comment No. I25-6.

Response to comment I93-7
See response to Comment No. I25-7.

Response to comment I93-8
See response to Comment No. I25-8.

Cannon, Tom, I585, Letter 617766



Transcribed Voicemail Comment
Anne Dailey To: cdabasin 11/22/2010 02:01 PM

Comment received via voicemail on November 19, 2010 at 7:48 am
From Tom Cannon (sp?)
Recorded by Anne Dailey

Hello, my name is Tom Cannon. I have lived in Coeur d;'Alene, Idaho for over 60 years. And I don't know how I can do this but I just read (the EPA flyer entitled) "Water Treatment a Smart way to Address Contamination" and it all makes sense to me.

I585-1 At the same time I got this little deal from you guys, I got a very slick copy in opposition came in the mail. I have fears that the mining people are mainly behind this with their money. I just want to register my support. I don't know about the overall thing, and if you will be up there for 90 years as they say you are. I am just reacting to this. I don't have a computer so I can't contact you that way.

Anyway you guys are doing a good job. Don't give up the fight. Thanks. 818-5449 You don't have to call me back. That's it.

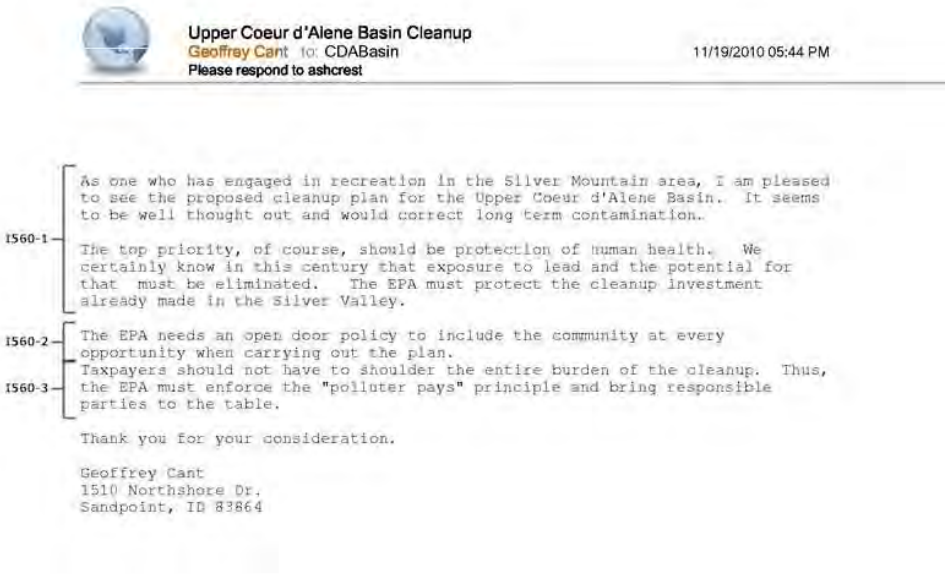
Anne Dailey
U.S. Environmental Protection Agency
1200 Sixth Avenue Suite 900 (MS ECL-113)
Seattle, WA 98101
ph - 206/553-2110 / fax - 206/553-0124
dailey.anne@epa.gov
http://yosemite.epa.gov/r10/cleanup.nsf/sites/cda

617766

Response to comment I585-1

Thank you for your comment.

Cant, Geoffrey, I560, Letter 617562



Upper Coeur d'Alene Basin Cleanup
Geoffrey Cant to: CDABasin 11/19/2010 05:44 PM
Please respond to ashcrest

I560-1 As one who has engaged in recreation in the Silver Mountain area, I am pleased to see the proposed cleanup plan for the Upper Coeur d'Alene Basin. It seems to be well thought out and would correct long term contamination.

The top priority, of course, should be protection of human health. We certainly know in this century that exposure to lead and the potential for that must be eliminated. The EPA must protect the cleanup investment already made in the Silver Valley.

I560-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I560-3 Taxpayers should not have to shoulder the entire burden of the cleanup. Thus, the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Thank you for your consideration.

Geoffrey Cant
1510 Northshore Dr.
Sandpoint, ID 83864

617562

Response to comment I560-1

See response to Comment No. I295-1.

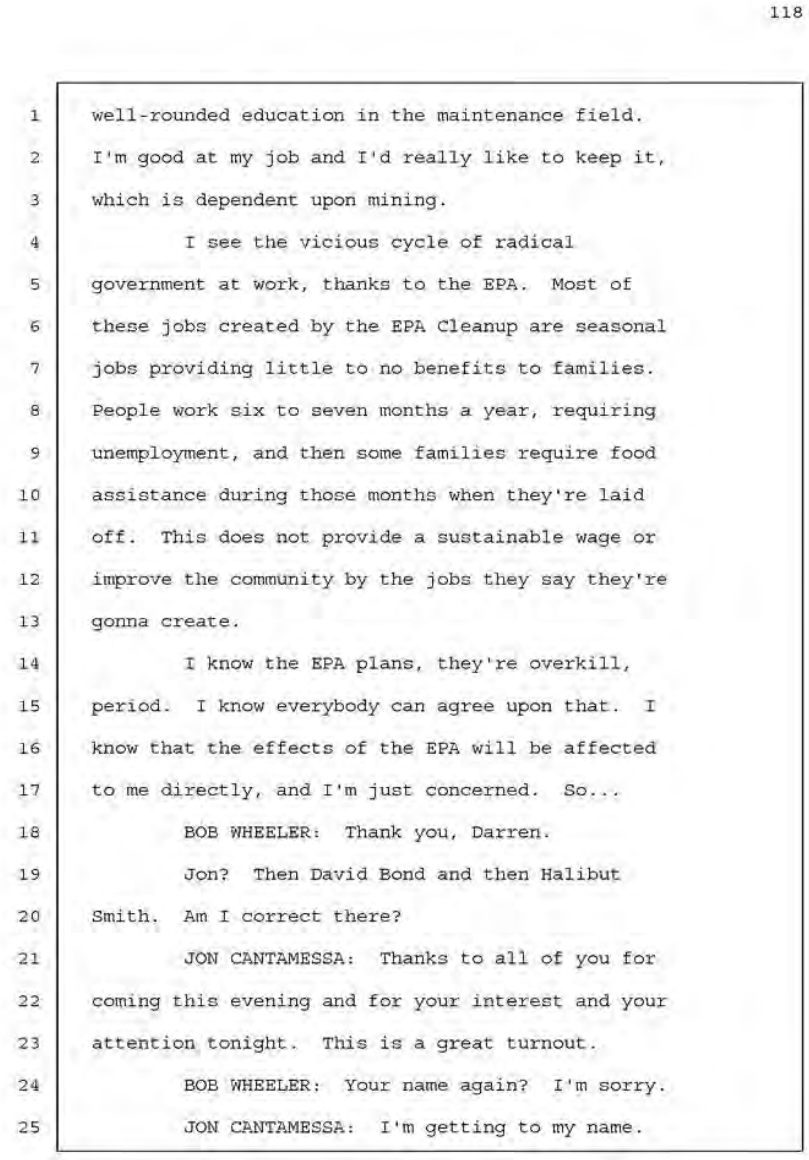
Response to comment I560-2

See response to Comment No. I295-2.

Response to comment I560-3

See response to Comment No. I295-3.

Cantamessa, Jon, I244, Letter 610097-39



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well-rounded education in the maintenance field. I'm good at my job and I'd really like to keep it, which is dependent upon mining.

I see the vicious cycle of radical government at work, thanks to the EPA. Most of these jobs created by the EPA Cleanup are seasonal jobs providing little to no benefits to families. People work six to seven months a year, requiring unemployment, and then some families require food assistance during those months when they're laid off. This does not provide a sustainable wage or improve the community by the jobs they say they're gonna create.

I know the EPA plans, they're overkill, period. I know everybody can agree upon that. I know that the effects of the EPA will be affected to me directly, and I'm just concerned. So...

BOB WHEELER: Thank you, Darren.

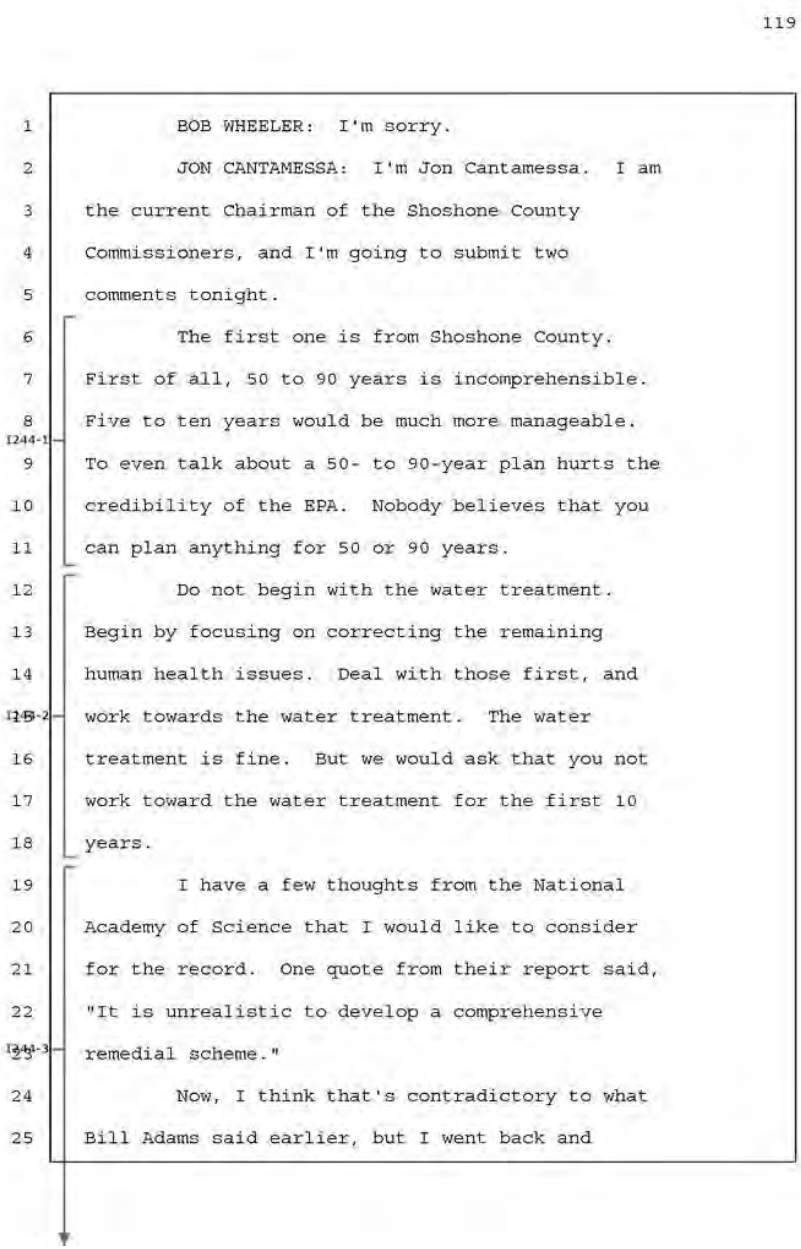
Jon? Then David Bond and then Halibut Smith. Am I correct there?

JON CANTAMESSA: Thanks to all of you for coming this evening and for your interest and your attention tonight. This is a great turnout.

BOB WHEELER: Your name again? I'm sorry.

JON CANTAMESSA: I'm getting to my name.

No comments



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BOB WHEELER: I'm sorry.

JON CANTAMESSA: I'm Jon Cantamessa. I am the current Chairman of the Shoshone County Commissioners, and I'm going to submit two comments tonight.

The first one is from Shoshone County. First of all, 50 to 90 years is incomprehensible. Five to ten years would be much more manageable. I244-1 To even talk about a 50- to 90-year plan hurts the credibility of the EPA. Nobody believes that you can plan anything for 50 or 90 years.

Do not begin with the water treatment. Begin by focusing on correcting the remaining human health issues. Deal with those first, and I244-2 work towards the water treatment. The water treatment is fine. But we would ask that you not work toward the water treatment for the first 10 years.

I have a few thoughts from the National Academy of Science that I would like to consider for the record. One quote from their report said, "It is unrealistic to develop a comprehensive I244-3 remedial scheme."

Now, I think that's contradictory to what Bill Adams said earlier, but I went back and

Response to comment I244-1

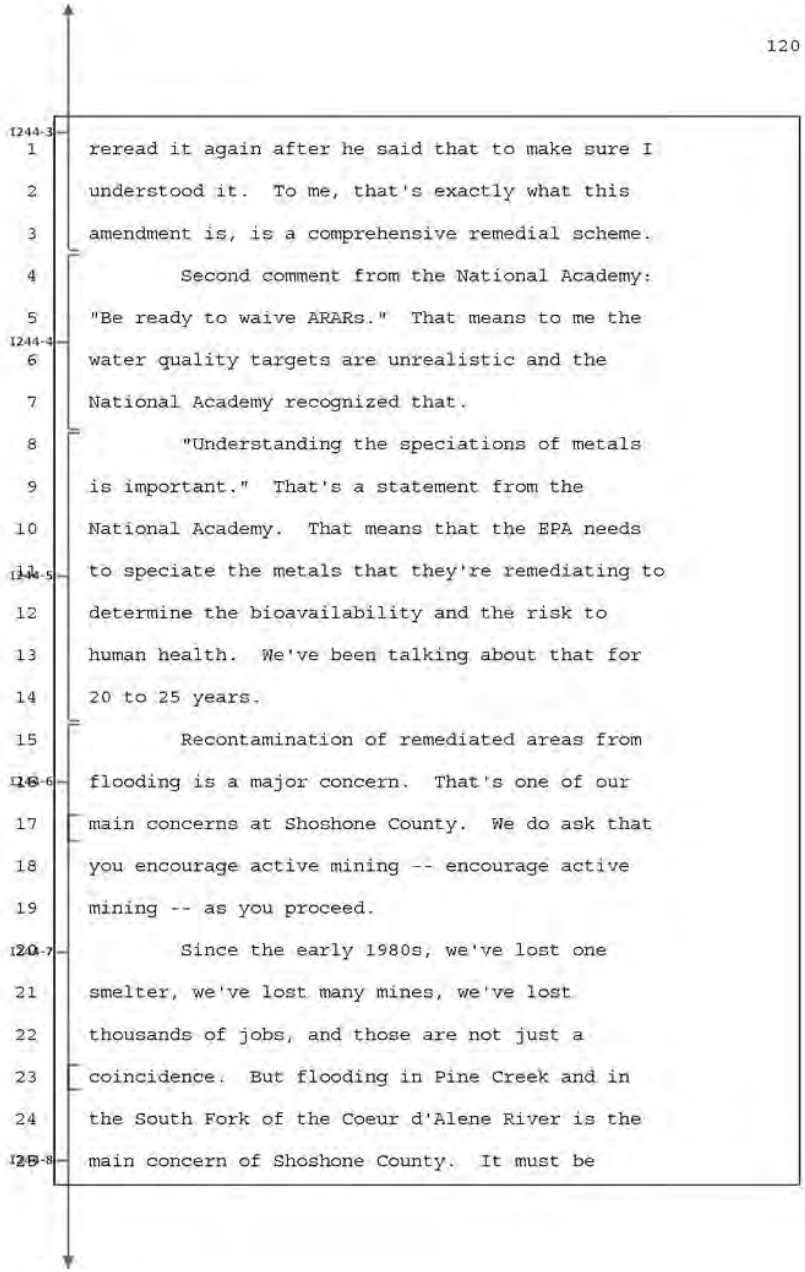
See response to Comment No. I58-1.

Response to comment I244-2

EPA agrees that protection of human health should be a high priority. EPA is committed to completion of the property remediation program identified under previous decision documents. That said EPA is also required to take actions that protect the environment. EPA believes that the water treatment actions in the selected remedy are also a high priority and can proceed concurrently with cleanup actions to address human health. Also see responses to Comment Nos. I295-1 and I58-1.

Response to comment I244-3

The ROD Amendment, including the Selected Remedy, was developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as required by CERCLA. In response to comments, EPA has significantly reduced the scope of the Selected Remedy and is not including all of the remedial actions that were identified in EPA's Preferred Alternative for the Upper Basin in the Proposed Plan. Changes made to the Selected Remedy are described in detail in Part 2, Section 14.0 of this ROD Amendment. Regarding the NAS recommendations, see response to Comment No. LJ27-8.



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I244-3
reread it again after he said that to make sure I understood it. To me, that's exactly what this amendment is, is a comprehensive remedial scheme.

Second comment from the National Academy: "Be ready to waive ARARs." That means to me the I244-4 water quality targets are unrealistic and the National Academy recognized that.

"Understanding the speciations of metals is important." That's a statement from the National Academy. That means that the EPA needs I244-5 to speciate the metals that they're remediating to determine the bioavailability and the risk to human health. We've been talking about that for 20 to 25 years.

Recontamination of remediated areas from I244-6 flooding is a major concern. That's one of our main concerns at Shoshone County. We do ask that you encourage active mining -- encourage active mining -- as you proceed.

I244-7 Since the early 1980s, we've lost one smelter, we've lost many mines, we've lost thousands of jobs, and those are not just a coincidence. But flooding in Pine Creek and in the South Fork of the Coeur d'Alene River is the I244-8 main concern of Shoshone County. It must be

Response to comment I244-4

See response to Comment No. SA4-11.

Response to comment I244-5

Regarding the issue of speciation of metals, sufficient information has been collected to quantify the unacceptable risks and conditions, and select appropriate remedies. Human health impacts are still apparent and waterfowl mortalities occur on an annual basis. As EPA implements the Selected Remedy with an adaptive management approach, considerations will be given regarding the need for additional monitoring.

Response to comment I244-6

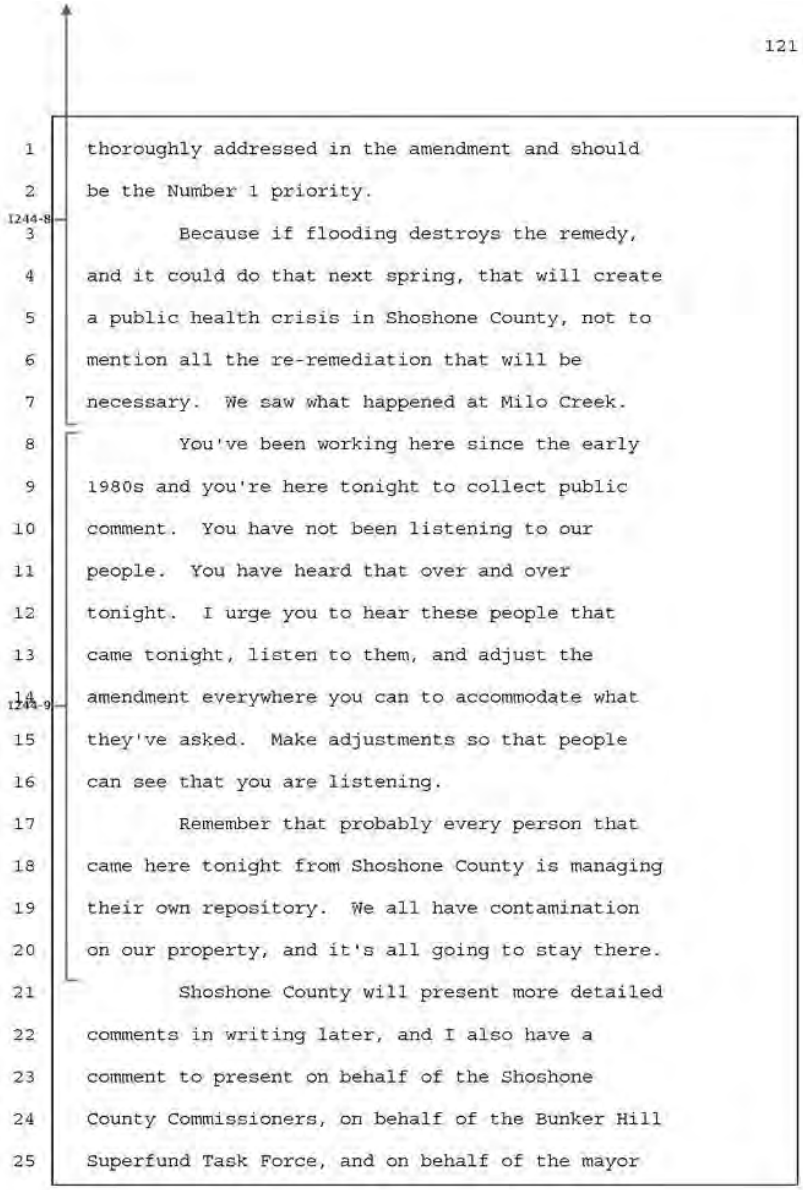
EPA is eager to ensure the long-term performance of the Selected Human Health Remedies. EPA is therefore committed to working with local, state, and federal entities with an interest in SFCDR flood issues and, consistent with EPA's authority, to help craft solutions. EPA can and will contribute to efforts to understand SFCDR flooding and, if these efforts identify actions that will meet Superfund remedy requirements, EPA will define and select these activities in future decision documents. CERCLA requires that EPA's contribution to flood control work must have a direct connection to the CERCLA remedy. For additional information see responses to Comment Nos. I54-5 and LJ36-3.

Response to comment I244-7

See response to Comment No. I58-5.

Response to comment I244-8

See response to Comment No. LJ36-3.



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thoroughly addressed in the amendment and should be the Number 1 priority.

I244-8

Because if flooding destroys the remedy, and it could do that next spring, that will create a public health crisis in Shoshone County, not to mention all the re-remediation that will be necessary. We saw what happened at Milo Creek.

You've been working here since the early 1980s and you're here tonight to collect public comment. You have not been listening to our people. You have heard that over and over tonight. I urge you to hear these people that came tonight, listen to them, and adjust the amendment everywhere you can to accommodate what

I244-9

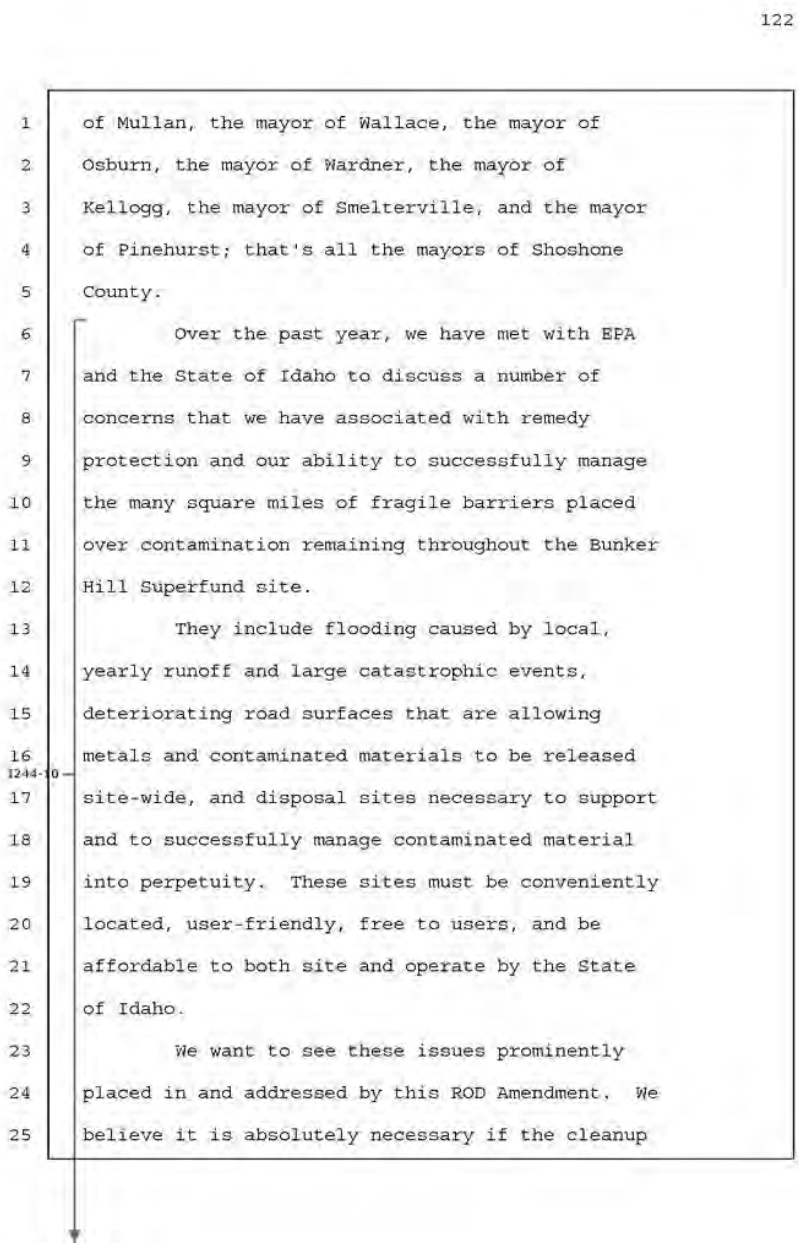
they've asked. Make adjustments so that people can see that you are listening.

Remember that probably every person that came here tonight from Shoshone County is managing their own repository. We all have contamination on our property, and it's all going to stay there.

Shoshone County will present more detailed comments in writing later, and I also have a comment to present on behalf of the Shoshone County Commissioners, on behalf of the Bunker Hill Superfund Task Force, and on behalf of the mayor

Response to comment I244-9

Thank you for your comment.



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of Mullan, the mayor of Wallace, the mayor of Osburn, the mayor of Wardner, the mayor of Kellogg, the mayor of Smelterville, and the mayor of Pinehurst; that's all the mayors of Shoshone County.

Over the past year, we have met with EPA and the State of Idaho to discuss a number of concerns that we have associated with remedy protection and our ability to successfully manage the many square miles of fragile barriers placed over contamination remaining throughout the Bunker Hill Superfund site.

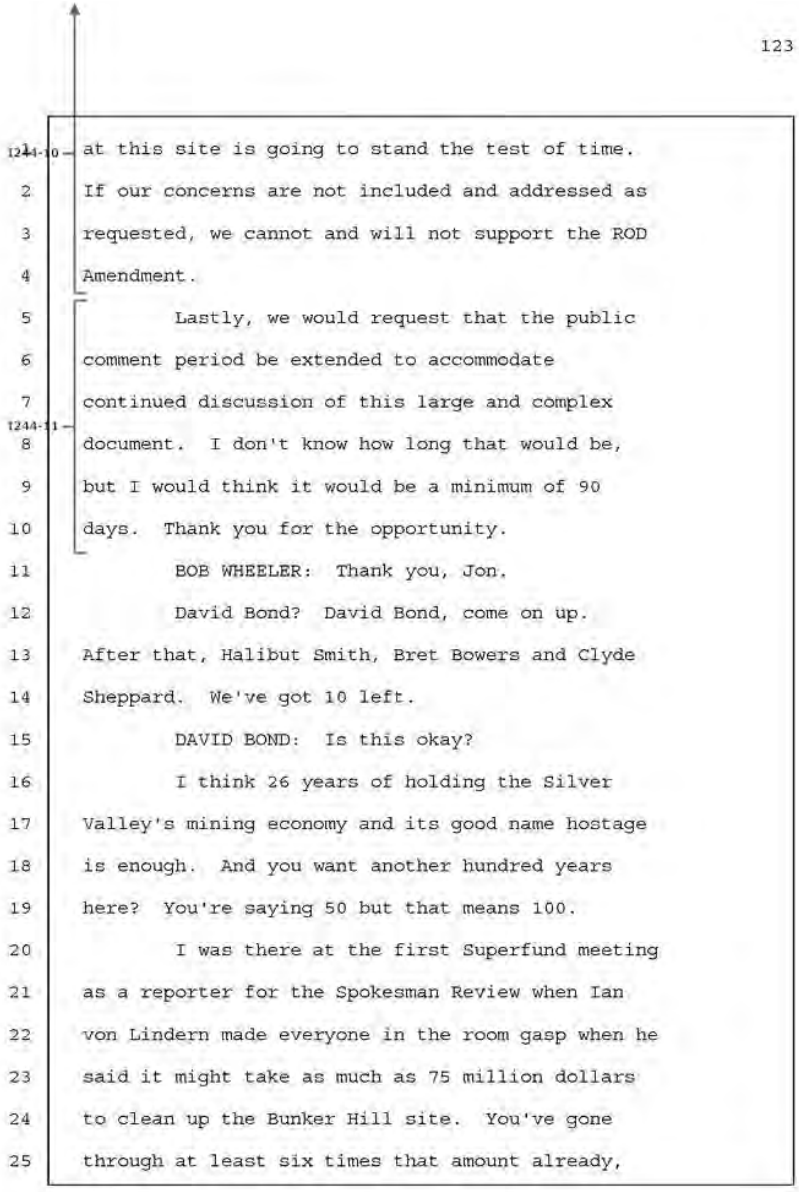
I244-10

They include flooding caused by local, yearly runoff and large catastrophic events, deteriorating road surfaces that are allowing metals and contaminated materials to be released site-wide, and disposal sites necessary to support and to successfully manage contaminated material into perpetuity. These sites must be conveniently located, user-friendly, free to users, and be affordable to both site and operate by the State of Idaho.

We want to see these issues prominently placed in and addressed by this ROD Amendment. We believe it is absolutely necessary if the cleanup

Response to comment I244-10

See responses to Comment Nos. I54-3, LJ36-3 and I54-5. The RODs for OUs 1, 2, and 3 address cleanup of rights-of-way (ROWs) in the Bunker Hill Box and the Coeur d'Alene Basin, as appropriate, to respond to risks to human health. The RODs allow ROWs to be cleaned up such that they provide barriers to underlying metals contamination. Many ROWs have been cleaned up as residential and commercial properties have been remediated in Box and Basin communities. However, EPA and IDEQ recognize that some pre-existing paved roadways may not provide adequate long-term barriers to underlying contaminated material, and that local and state entities are responsible for the long-term road development and maintenance efforts. As a result, the agencies are developing an approach under the existing RODs to address this issue collaboratively with local, county, and state entities responsible for providing and maintaining roadways in their communities. The objective of this effort is to develop and implement a strategy that ensures the long-term effectiveness of barriers installed in ROWs, and also aligns with the transportation and maintenance needs of the Box and Basin communities.



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I244-10 at this site is going to stand the test of time. If our concerns are not included and addressed as requested, we cannot and will not support the ROD Amendment.

Lastly, we would request that the public comment period be extended to accommodate continued discussion of this large and complex I244-11 document. I don't know how long that would be, but I would think it would be a minimum of 90 days. Thank you for the opportunity.

BOB WHEELER: Thank you, Jon.

David Bond? David Bond, come on up. After that, Halibut Smith, Bret Bowers and Clyde Sheppard. We've got 10 left.

DAVID BOND: Is this okay?

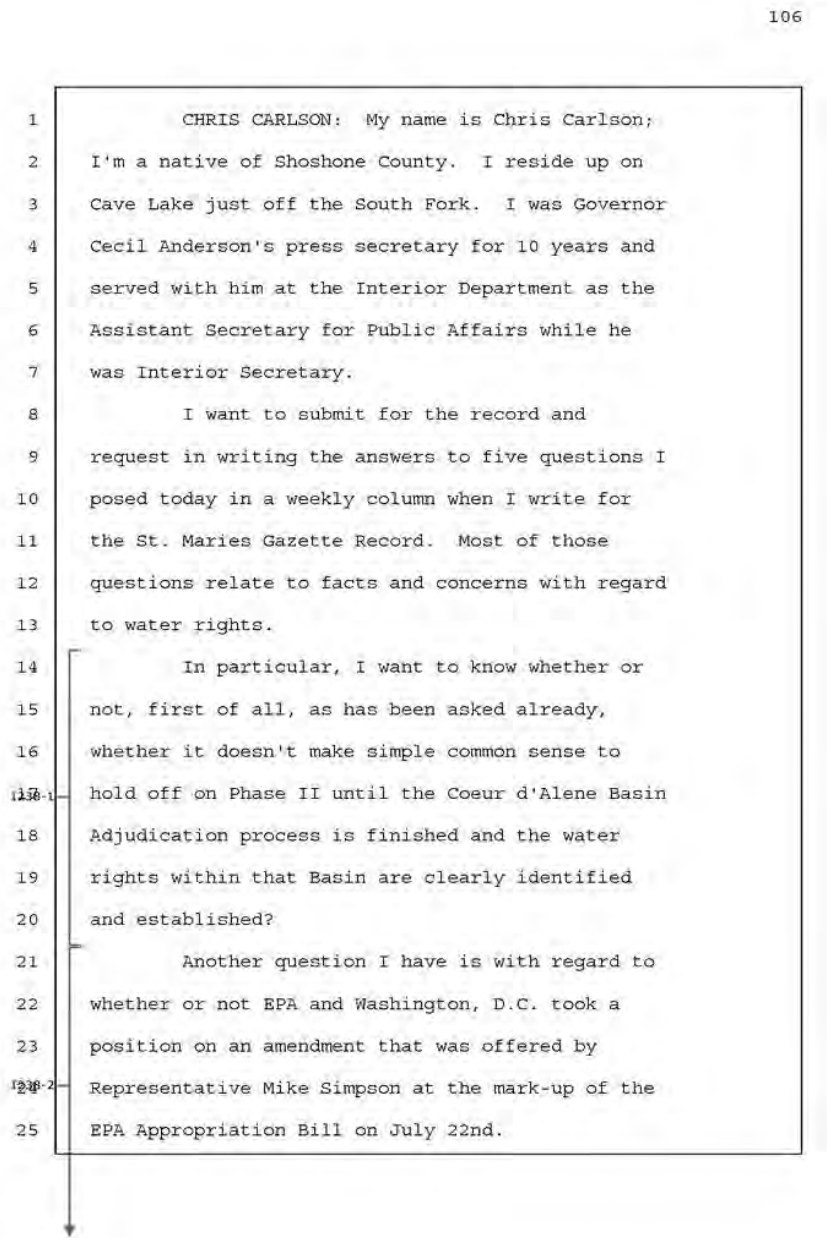
I think 26 years of holding the Silver Valley's mining economy and its good name hostage is enough. And you want another hundred years here? You're saying 50 but that means 100.

I was there at the first Superfund meeting as a reporter for the Spokesman Review when Ian von Lindern made everyone in the room gasp when he said it might take as much as 75 million dollars to clean up the Bunker Hill site. You've gone through at least six times that amount already,

Response to comment I244-11

See response to Comment No. I54-6.

Carlson, Chris, I238, Letter 610097-33



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CHRIS CARLSON: My name is Chris Carlson; I'm a native of Shoshone County. I reside up on Cave Lake just off the South Fork. I was Governor Cecil Anderson's press secretary for 10 years and served with him at the Interior Department as the Assistant Secretary for Public Affairs while he was Interior Secretary.

I want to submit for the record and request in writing the answers to five questions I posed today in a weekly column when I write for the St. Maries Gazette Record. Most of those questions relate to facts and concerns with regard to water rights.

In particular, I want to know whether or not, first of all, as has been asked already, whether it doesn't make simple common sense to hold off on Phase II until the Coeur d'Alene Basin Adjudication process is finished and the water rights within that Basin are clearly identified and established?

I238-1

Another question I have is with regard to whether or not EPA and Washington, D.C. took a position on an amendment that was offered by Representative Mike Simpson at the mark-up of the EPA Appropriation Bill on July 22nd.

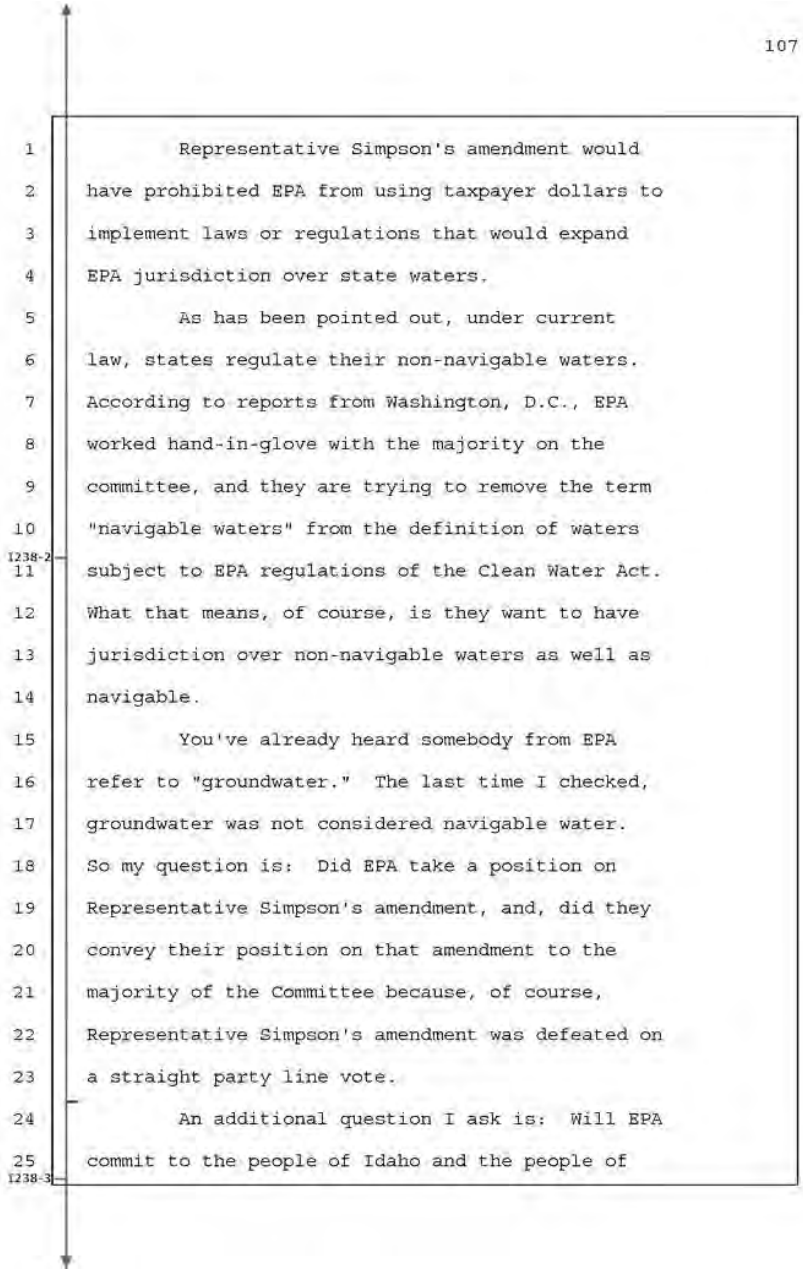
I238-2

Response to comment I238-1

EPA does believe that it makes sense to delay issuance of the Selected Remedy until after the Northern Idaho Adjudication has been completed. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I238-2

EPA assumes that the commenter is referring to ongoing efforts to address jurisdictional issues related to the Clean Water Act. These issues are well outside of the scope of the Selected Remedy and EPA's efforts to address mine waste contamination in the Coeur d'Alene Basin.



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Representative Simpson's amendment would have prohibited EPA from using taxpayer dollars to implement laws or regulations that would expand EPA jurisdiction over state waters.

As has been pointed out, under current law, states regulate their non-navigable waters. According to reports from Washington, D.C., EPA worked hand-in-glove with the majority on the committee, and they are trying to remove the term "navigable waters" from the definition of waters subject to EPA regulations of the Clean Water Act. What that means, of course, is they want to have jurisdiction over non-navigable waters as well as navigable.

I238-2

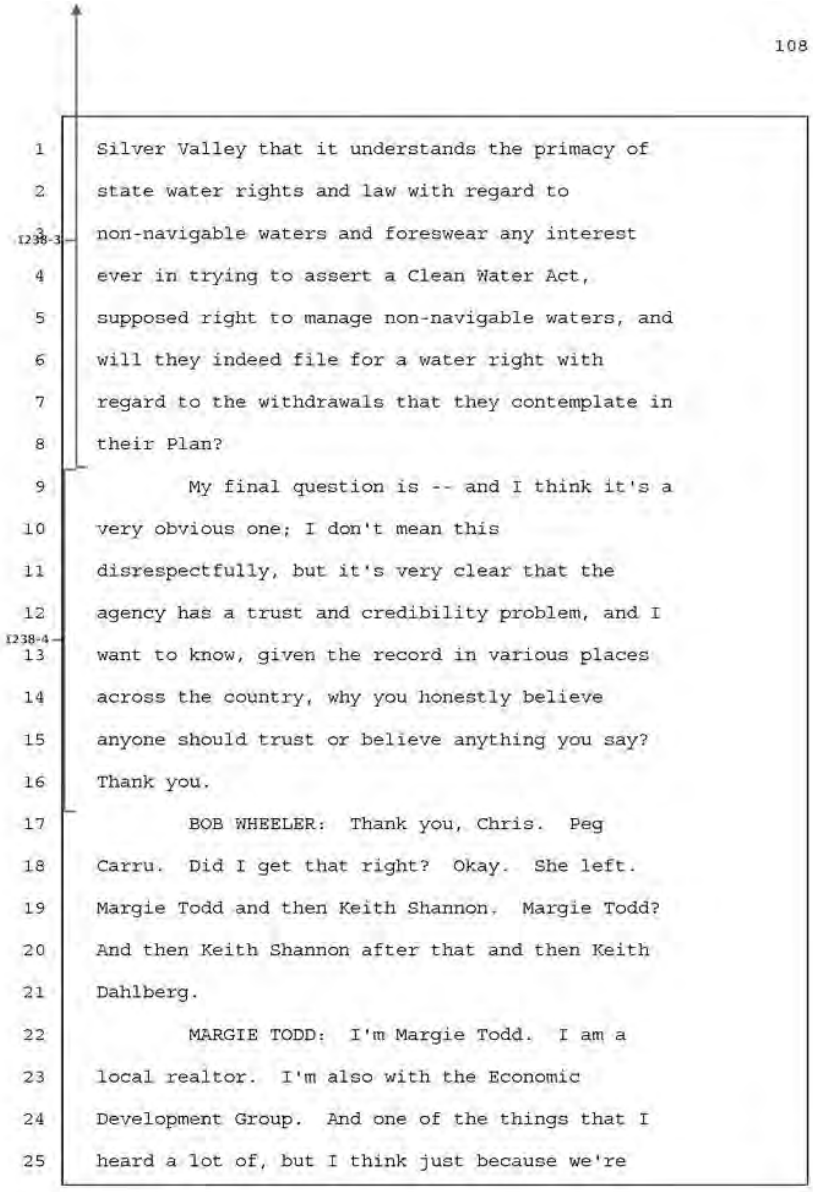
You've already heard somebody from EPA refer to "groundwater." The last time I checked, groundwater was not considered navigable water. So my question is: Did EPA take a position on Representative Simpson's amendment, and, did they convey their position on that amendment to the majority of the Committee because, of course, Representative Simpson's amendment was defeated on a straight party line vote.

An additional question I ask is: Will EPA commit to the people of Idaho and the people of

I238-3

Response to comment I238-3

The comment raises issues concerning EPA regulation of non-navigable waters. Regulations of such waters is well beyond EPA's decision to the select remedial actions for the Upper Basin and the Selected Remedy does not regulate such waters. See responses to Comment Nos. SAA1-5 and SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.



108

Silver Valley that it understands the primacy of state water rights and law with regard to non-navigable waters and foreswear any interest ever in trying to assert a Clean Water Act, supposed right to manage non-navigable waters, and will they indeed file for a water right with regard to the withdrawals that they contemplate in their Plan?

I238-3

My final question is -- and I think it's a very obvious one; I don't mean this disrespectfully, but it's very clear that the agency has a trust and credibility problem, and I want to know, given the record in various places across the country, why you honestly believe anyone should trust or believe anything you say? Thank you.

I238-4

BOB WHEELER: Thank you, Chris. Peg Carru. Did I get that right? Okay. She left. Margie Todd and then Keith Shannon. Margie Todd? And then Keith Shannon after that and then Keith Dahlberg.

MARGIE TODD: I'm Margie Todd. I am a local realtor. I'm also with the Economic Development Group. And one of the things that I heard a lot of, but I think just because we're

Response to comment I238-4

Thank you for your comment. EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin.

Carlson, Eric, I220, Letter 610097-15

disagreements and working together to make this a place where people can come and live and raise their families and be secure with a future for their children, their grandchildren, and their great, great, great grandchildren.

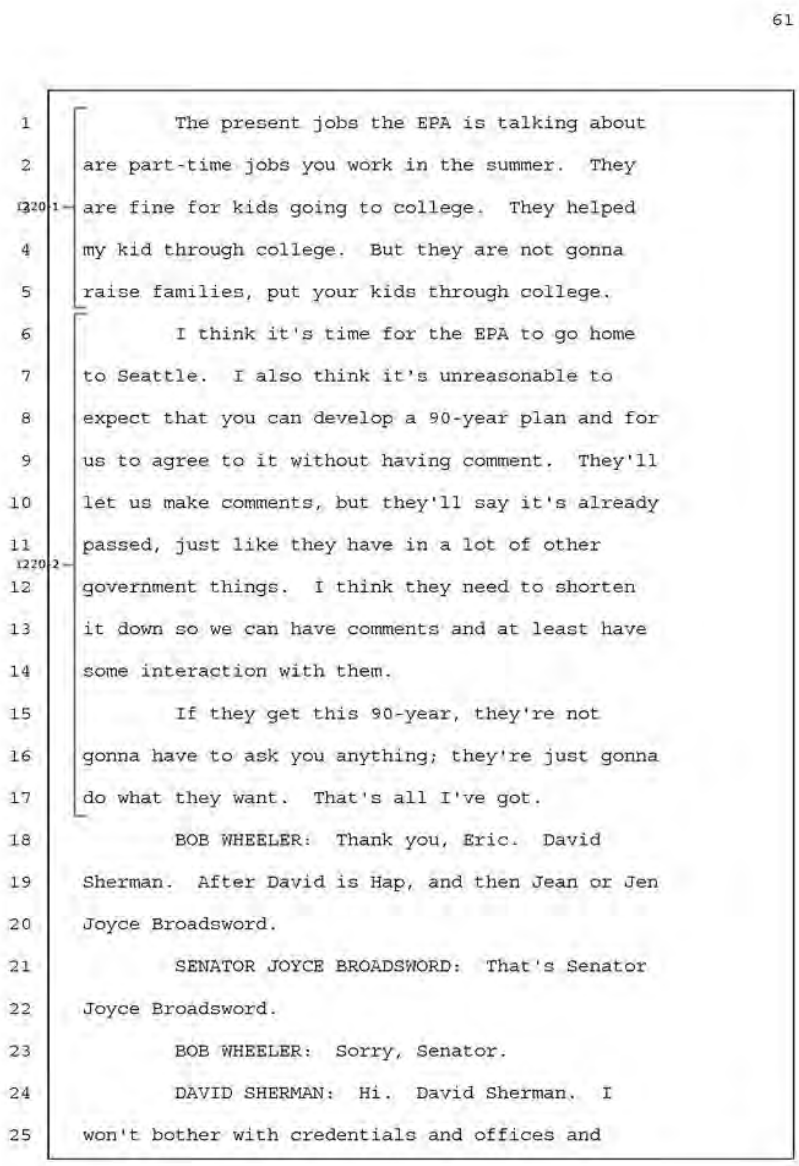
That's my piece that I'm saying tonight. And there will be things coming through the mail, on the airwaves, in the newspaper, to do just exactly that, to bring us together and to take back our county. It is our county, it is our state, it is our America that's being taken away from us.

BOB WHEELER: Thank you, Dan. Next is Eric Carlson, and then David Sherman, and then Hap Butler.

ERIC CARLSON: My name is Eric Carlson and I'm a transplant from Seattle. I moved here in 1970. At that time, we had over 10,000 people working in the mines or in the woods. Now, I doubt we've got even 1,000 people.

I was able to come here, get a job, get married, buy a home, send two kids to college, they graduated from college, they are now school teachers, and this was all provided by the mining industry.

No comments



61

The present jobs the EPA is talking about are part-time jobs you work in the summer. They I220-1 are fine for kids going to college. They helped my kid through college. But they are not gonna raise families, put your kids through college.

I think it's time for the EPA to go home to Seattle. I also think it's unreasonable to expect that you can develop a 90-year plan and for us to agree to it without having comment. They'll let us make comments, but they'll say it's already passed, just like they have in a lot of other I220-2 government things. I think they need to shorten it down so we can have comments and at least have some interaction with them.

If they get this 90-year, they're not gonna have to ask you anything; they're just gonna do what they want. That's all I've got.

BOB WHEELER: Thank you, Eric. David Sherman. After David is Hap, and then Jean or Jen Joyce Broadsword.

SENATOR JOYCE BROADSWORD: That's Senator Joyce Broadsword.

BOB WHEELER: Sorry, Senator.

DAVID SHERMAN: Hi. David Sherman. I won't bother with credentials and offices and

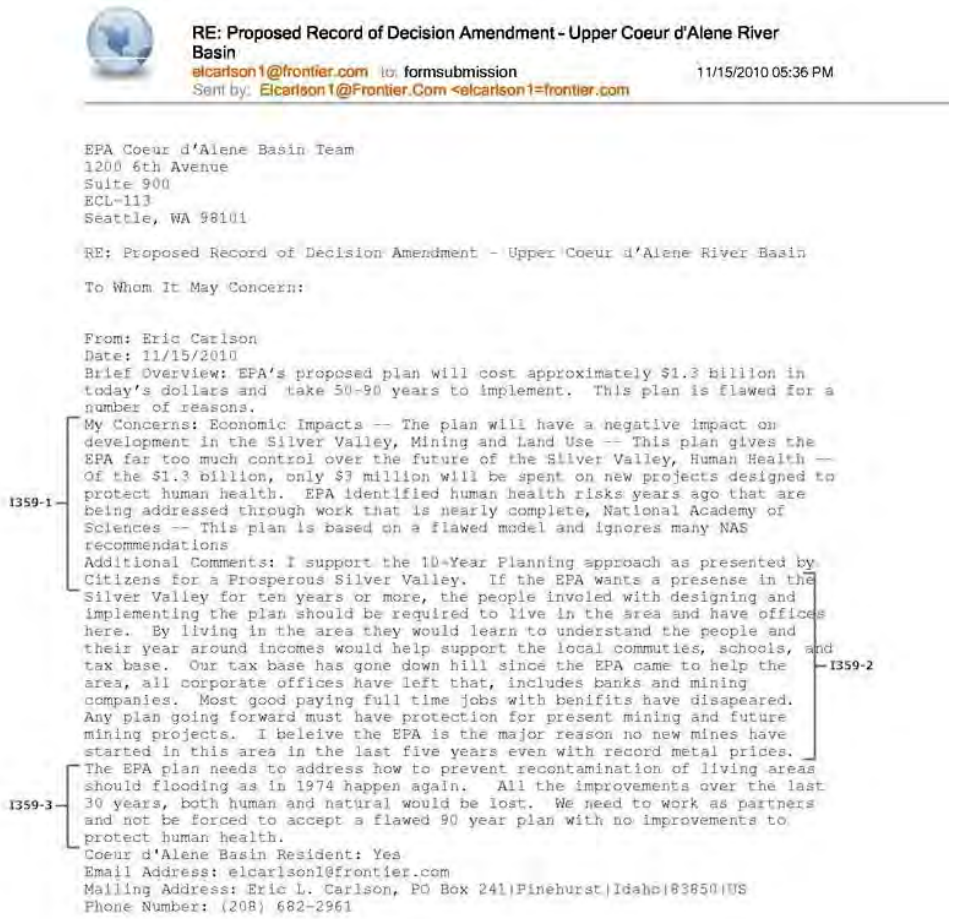
Response to comment I220-1

See response to Comment No. LC32-2.

Response to comment I220-2

See responses to Comment Nos. I58-1 and I295-2.

Carlson, Eric, I359, Letter 616244



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
elcarlson1@frontier.com to: formsubmission 11/15/2010 05:36 PM
Sent by: Elcarlson1@Frontier.Com <elcarlson1=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Eric Carlson
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I359-1 My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. If the EPA wants a presense in the Silver Valley for ten years or more, the people involed with designing and implementing the plan should be required to live in the area and have offices here. By living in the area they would learn to understand the people and their year around incomes would help support the local commuties, schools, and tax base. Our tax base has gone down hill since the EPA came to help the area, all corporate offices have left that, includes banks and mining companies. Most good paying full time jobs with benifits have disapeared. Any plan going forward must have protection for present mining and future mining projects. I beleive the EPA is the major reason no new mines have started in this area in the last five years even with record metal prices. I359-2
I359-3 The EPA plan needs to address how to prevent recontamination of living areas should flooding as in 1974 happen again. All the improvements over the last 30 years, both human and natural would be lost. We need to work as partners and not be forced to accept a flawed 90 year plan with no improvements to protect human health.
Coeur d'Alene Basin Resident: Yes
Email Address: elcarlson1@frontier.com
Mailing Address: Eric L. Carlson, PO Box 241|Pinehurst|Idaho|83850|US
Phone Number: (208) 682-2961

616244

Response to comment I359-1

See response to Comment No. I351-1.

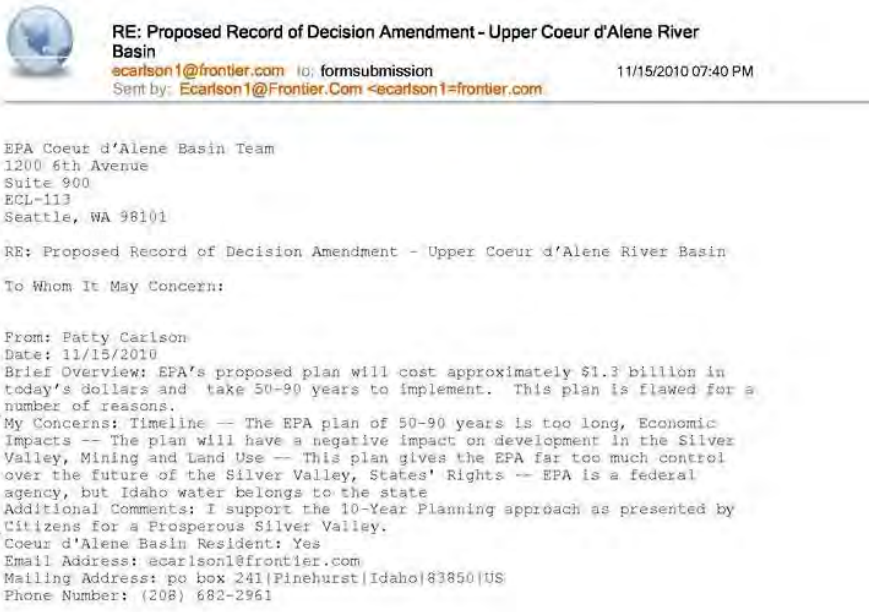
Response to comment I359-2

See responses to Comment Nos. I54-2 and I58-5.

Response to comment I359-3

See responses to Comment Nos. I54-5 and LJ36-3.

Carlson, Patty, I358, Letter 616243



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
ecarlson1@frontier.com to: formsubmission 11/15/2010 07:40 PM
Sent by: Ecarlson1@Frontier.Com <ecarlson1=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

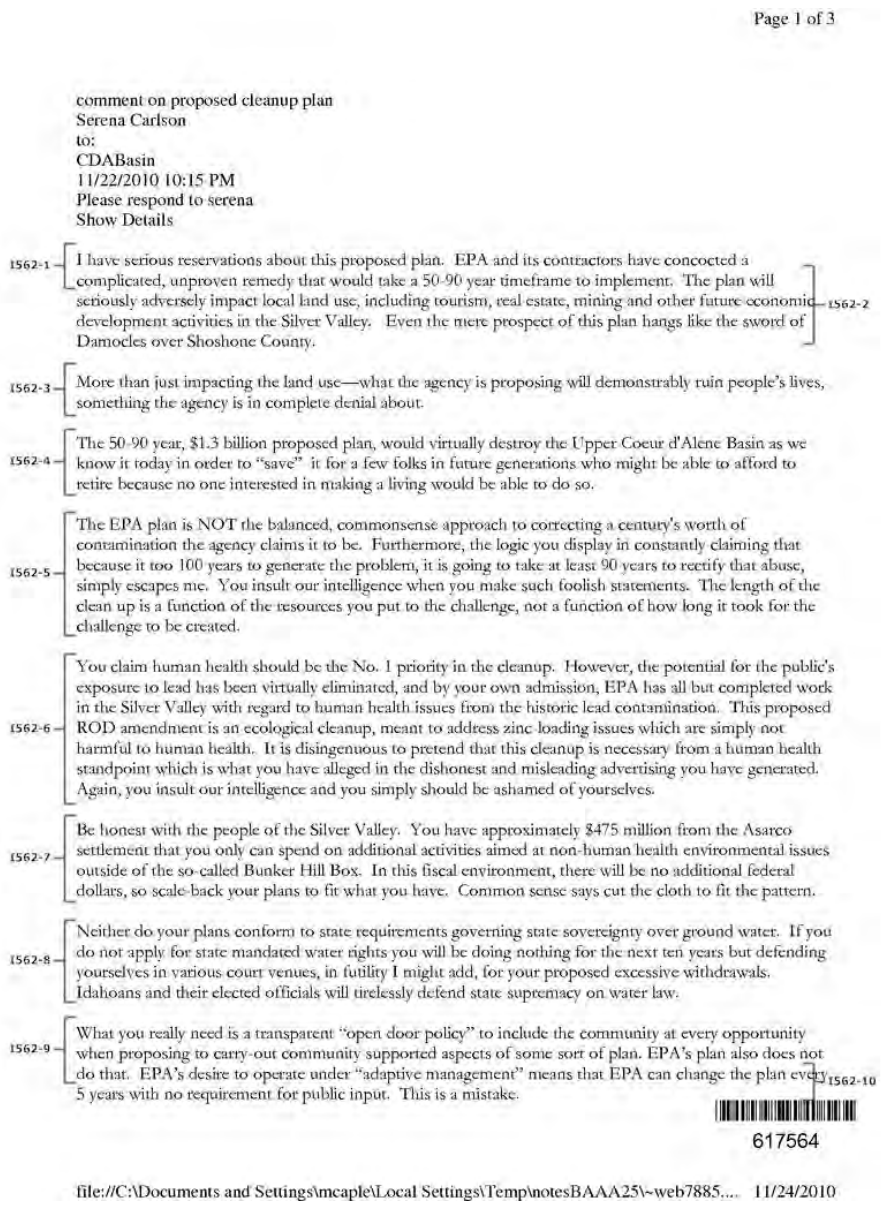
From: Patty Carlson
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I358-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: ecarlson1@frontier.com
Mailing Address: po box 241|Pinehurst|Idaho|83850|US
Phone Number: (208) 682-2961

616243

Response to comment I358-1

See response to Comment No. I351-1.

Carlson, Serena, I562, Letter 617564



Page 1 of 3

comment on proposed cleanup plan
Serena Carlson
to:
CDABasin
11/22/2010 10:15 PM
Please respond to serena
Show Details

I562-1 I have serious reservations about this proposed plan. EPA and its contractors have concocted a complicated, unproven remedy that would take a 50-90 year timeframe to implement. The plan will seriously adversely impact local land use, including tourism, real estate, mining and other future economic development activities in the Silver Valley. Even the mere prospect of this plan hangs like the sword of Damocles over Shoshone County. I562-2

I562-3 More than just impacting the land use—what the agency is proposing will demonstrably ruin people's lives, something the agency is in complete denial about.

I562-4 The 50-90 year, $1.3 billion proposed plan, would virtually destroy the Upper Coeur d'Alene Basin as we know it today in order to "save" it for a few folks in future generations who might be able to afford to retire because no one interested in making a living would be able to do so.

I562-5 The EPA plan is NOT the balanced, commonsense approach to correcting a century's worth of contamination the agency claims it to be. Furthermore, the logic you display in constantly claiming that because it too 100 years to generate the problem, it is going to take at least 90 years to rectify that abuse, simply escapes me. You insult our intelligence when you make such foolish statements. The length of the clean up is a function of the resources you put to the challenge, not a function of how long it took for the challenge to be created.

I562-6 You claim human health should be the No. 1 priority in the cleanup. However, the potential for the public's exposure to lead has been virtually eliminated, and by your own admission, EPA has all but completed work in the Silver Valley with regard to human health issues from the historic lead contamination. This proposed ROD amendment is an ecological cleanup, meant to address zinc loading issues which are simply not harmful to human health. It is disingenuous to pretend that this cleanup is necessary from a human health standpoint which is what you have alleged in the dishonest and misleading advertising you have generated. Again, you insult our intelligence and you simply should be ashamed of yourselves.

I562-7 Be honest with the people of the Silver Valley. You have approximately $475 million from the Asarco settlement that you only can spend on additional activities aimed at non-human health environmental issues outside of the so-called Bunker Hill Box. In this fiscal environment, there will be no additional federal dollars, so scale-back your plans to fit what you have. Common sense says cut the cloth to fit the pattern.

I562-8 Neither do your plans conform to state requirements governing state sovereignty over ground water. If you do not apply for state mandated water rights you will be doing nothing for the next ten years but defending yourselves in various court venues, in futility I might add, for your proposed excessive withdrawals. Idahoans and their elected officials will tirelessly defend state supremacy on water law.

I562-9 What you really need is a transparent "open door policy" to include the community at every opportunity when proposing to carry-out community supported aspects of some sort of plan. EPA's plan also does not do that. EPA's desire to operate under "adaptive management" means that EPA can change the plan every 5 years with no requirement for public input. This is a mistake. I562-10

617564

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Response to comment I562-1
See response to Comment No. I58-1.

Response to comment I562-2
See response to Comment No. I474-1.

Response to comment I562-3
Comment noted.

Response to comment I562-4
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I562-5
See response to Comment No. I58-1.

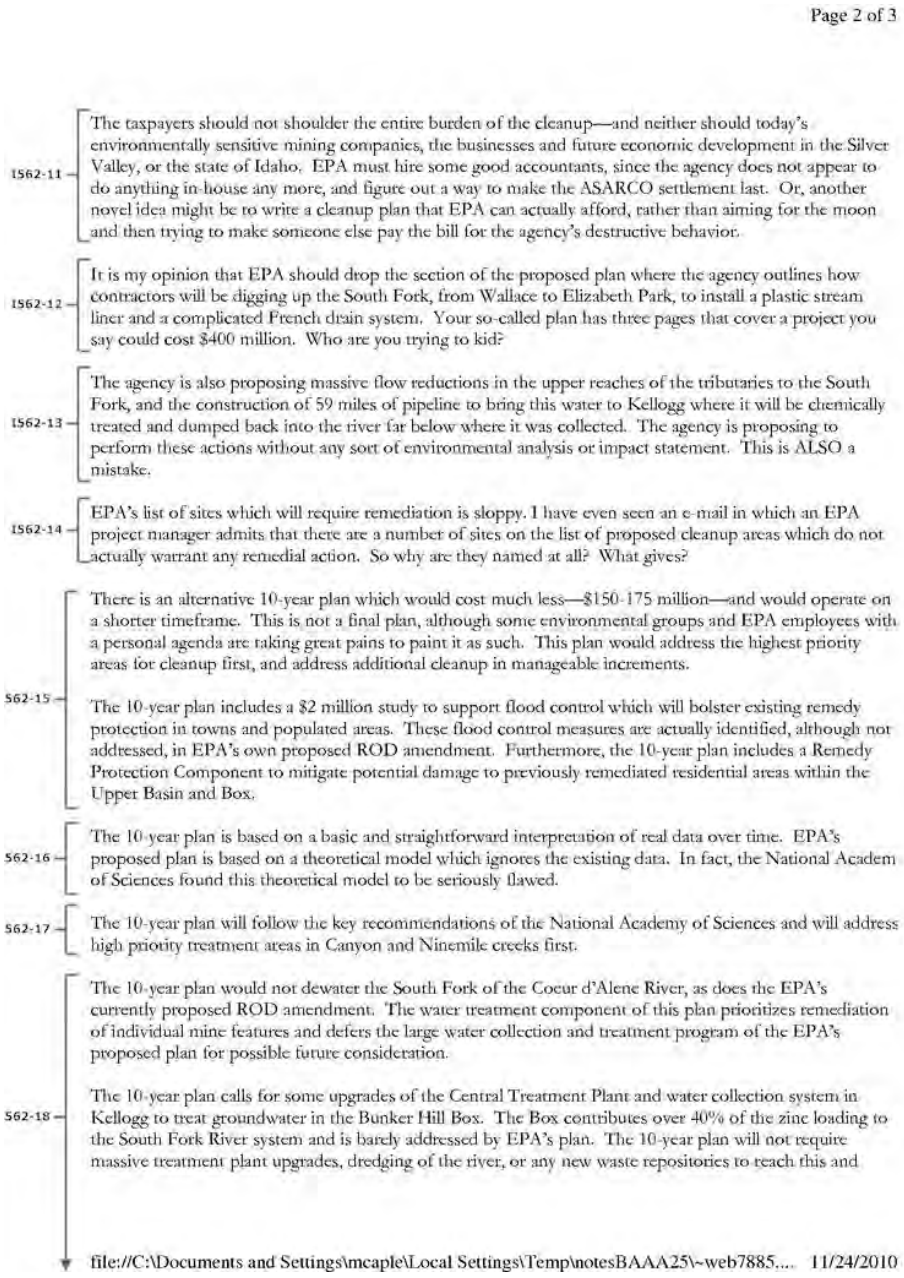
Response to comment I562-6
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, particularly with regards to human health, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. Millions of tons of old mill tailings, mine waste rock, and ore concentrates are spread across areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

Response to comment I562-7
See responses to Comment Nos. I295-3 and I58-1.

Response to comment I562-8
As it implements the Selected Remedy EPA intends to satisfy State water law as required by CERCLA. See response to Comments No. SA4-12, and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I562-9
See response to comment No. I295-2.

Response to comment I562-10
See response to Comment No. LJ11-2.



Page 2 of 3

I562-11 The taxpayers should not shoulder the entire burden of the cleanup—and neither should today's environmentally sensitive mining companies, the businesses and future economic development in the Silver Valley, or the state of Idaho. EPA must hire some good accountants, since the agency does not appear to do anything in-house any more, and figure out a way to make the ASARCO settlement last. Or, another novel idea might be to write a cleanup plan that EPA can actually afford, rather than aiming for the moon and then trying to make someone else pay the bill for the agency's destructive behavior.

I562-12 It is my opinion that EPA should drop the section of the proposed plan where the agency outlines how contractors will be digging up the South Fork, from Wallace to Elizabeth Park, to install a plastic stream liner and a complicated French drain system. Your so-called plan has three pages that cover a project you say could cost $400 million. Who are you trying to kid?

I562-13 The agency is also proposing massive flow reductions in the upper reaches of the tributaries to the South Fork, and the construction of 59 miles of pipeline to bring this water to Kellogg where it will be chemically treated and dumped back into the river far below where it was collected. The agency is proposing to perform these actions without any sort of environmental analysis or impact statement. This is ALSO a mistake.

I562-14 EPA's list of sites which will require remediation is sloppy. I have even seen an e-mail in which an EPA project manager admits that there are a number of sites on the list of proposed cleanup areas which do not actually warrant any remedial action. So why are they named at all? What gives?

There is an alternative 10-year plan which would cost much less—$150-175 million—and would operate on a shorter timeframe. This is not a final plan, although some environmental groups and EPA employees with a personal agenda are taking great pains to paint it as such. This plan would address the highest priority areas for cleanup first, and address additional cleanup in manageable increments.

562-15 The 10-year plan includes a $2 million study to support flood control which will bolster existing remedy protection in towns and populated areas. These flood control measures are actually identified, although not addressed, in EPA's own proposed ROD amendment. Furthermore, the 10-year plan includes a Remedy Protection Component to mitigate potential damage to previously remediated residential areas within the Upper Basin and Box.

562-16 The 10-year plan is based on a basic and straightforward interpretation of real data over time. EPA's proposed plan is based on a theoretical model which ignores the existing data. In fact, the National Academ of Sciences found this theoretical model to be seriously flawed.

562-17 The 10-year plan will follow the key recommendations of the National Academy of Sciences and will address high priority treatment areas in Canyon and Ninemile creeks first.

The 10-year plan would not dewater the South Fork of the Coeur d'Alene River, as does the EPA's currently proposed ROD amendment. The water treatment component of this plan prioritizes remediation of individual mine features and defers the large water collection and treatment program of the EPA's proposed plan for possible future consideration.

562-18 The 10-year plan calls for some upgrades of the Central Treatment Plant and water collection system in Kellogg to treat groundwater in the Bunker Hill Box. The Box contributes over 40% of the zinc loading to the South Fork River system and is barely addressed by EPA's plan. The 10-year plan will not require massive treatment plant upgrades, dredging of the river, or any new waste repositories to reach this and

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Response to comment I562-11
See responses to Comment Nos. I58-2 and I295-3.

Response to comment I562-12
See response to Comment No. I828-10.

Response to comment I562-13
See response to comment I54-8.

Response to comment I562-14
See response to Comment No. I822-14.

Response to comment I562-15
See response to Comment No. I474-2.

Response to comment I562-16
See responses to Comment Nos. LJ27-8 and I474-2.

Response to comment I562-17
See responses to Comment Nos. LJ27-8 and I474-2.

Response to comment I562-18
See response to Comment No. I474-2.

other achievable goals and benchmarks.

Furthermore, this well-thought-out plan will improve fisheries and water standards through site specific actions and proven technologies—more quickly and at less cost than the proposed EPA plan. Additionally, the 10-year plan respects existing water rights, states' rights and private property rights. The plan can accommodate development needs in the Silver Valley because it is only a ten-year plan. It does not lock anyone into a 50-90 year commitment and can much more readily respond to the changing needs of Shoshor County's communities.

I562-18

The 10-year plan would also incorporate many opportunities for meaningful public comment and involvement. This plan is consistent with CERCLA requirements for meaningful public participation, and ensures that the public has a continuing role in defining the Basin's future. A plan like this one is what the National Academy of Sciences had in mind when it endorsed an adaptive management approach to Basin cleanup.

Last but not least, the 10-year plan provides an opportunity for a thorough review by Idaho's 2011 Legislature. This 10-year plan is the best plan for the Valley and for Idaho, and I enthusiastically support thi proposal.

I feel that you, EPA, owe me a response to these comments and concerns. You also owe it to the Silver Valley to consider a plan that is better written and more effective than yours. Although Region 10 EPA Director Dennis McLerran has already publicly dismissed the ten-year plan (prior to the end of the comment period, I might add), it is a better approach for the people who live and work in the Silver Valley.

I562-19

Serena Carlson
Carlson Strategic Communications, LLC
3676 N. Steven Place
Coeur d'Alene, Idaho 83815
(208) 818-4338 cell
serena@carlsonstratcomm.com
www.carlsonstratcomm.com

Response to comment I562-19

See response to Comment No. I474-2.

Carney, Lisa, I360, Letter 616246

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
lisaa10k@suddenlink.net to: formsubmission 11/11/2010 10:43 AM
Sent by: Lisaa10k@Suddenlink.Net <lisaa10k=suddenlink.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

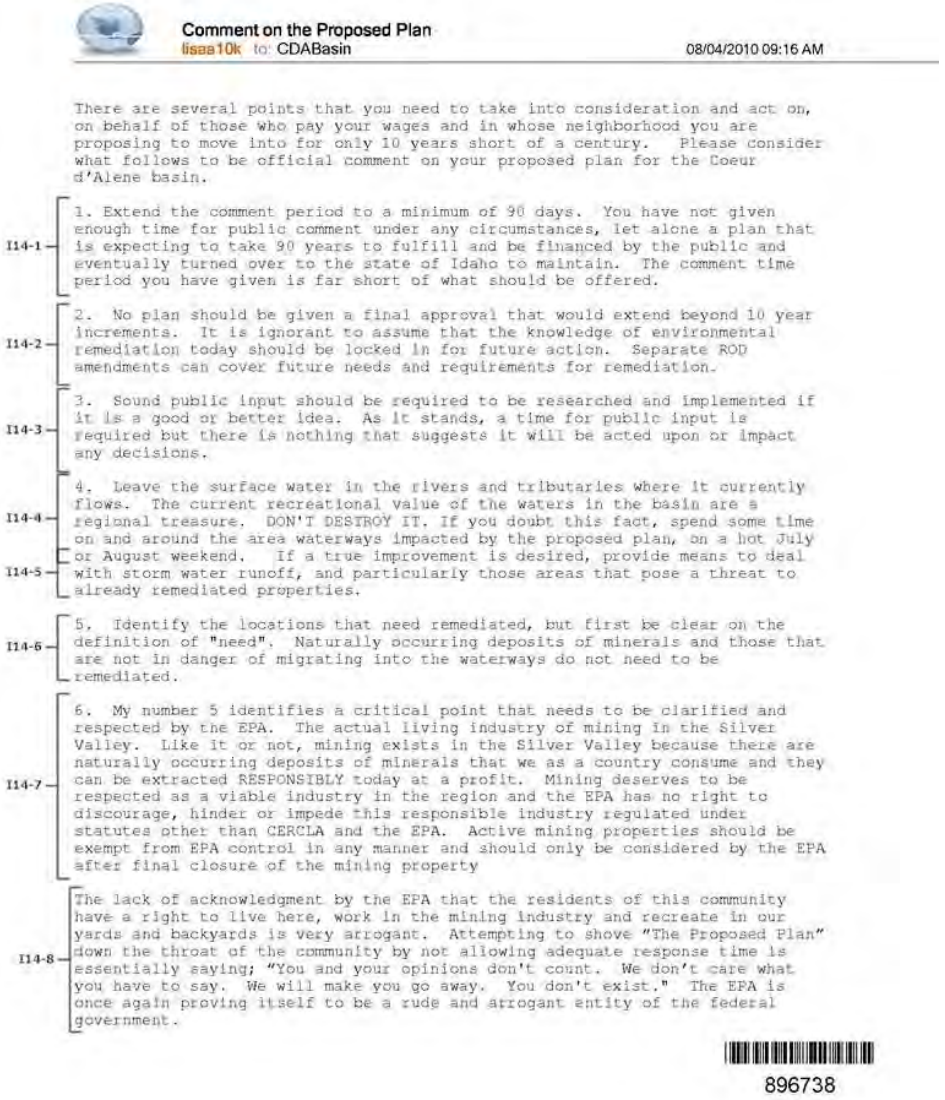
From: Lisa Carney
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I360-1 My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: lisaa10k@suddenlink.net
Mailing Address: P.O. Box 72, 40636 Riverview Dr.|Cataldo|ID|83810|US
Phone Number:

616246

Response to comment I360-1

See response to Comment No. I351-1.

Carney, Lisa, I14, Letter 896738



Comment on the Proposed Plan
lisaa10k to: CDABasin 08/04/2010 09:16 AM

There are several points that you need to take into consideration and act on, on behalf of those who pay your wages and in whose neighborhood you are proposing to move into for only 10 years short of a century. Please consider what follows to be official comment on your proposed plan for the Coeur d'Alene basin.

I14-1 1. Extend the comment period to a minimum of 90 days. You have not given enough time for public comment under any circumstances, let alone a plan that is expecting to take 90 years to fulfill and be financed by the public and eventually turned over to the state of Idaho to maintain. The comment time period you have given is far short of what should be offered.

I14-2 2. No plan should be given a final approval that would extend beyond 10 year increments. It is ignorant to assume that the knowledge of environmental remediation today should be locked in for future action. Separate ROD amendments can cover future needs and requirements for remediation.

I14-3 3. Sound public input should be required to be researched and implemented if it is a good or better idea. As it stands, a time for public input is required but there is nothing that suggests it will be acted upon or impact any decisions.

I14-4 4. Leave the surface water in the rivers and tributaries where it currently flows. The current recreational value of the waters in the basin are a regional treasure. DON'T DESTROY IT. If you doubt this fact, spend some time on and around the area waterways impacted by the proposed plan, on a hot July or August weekend.

I14-5 If a true improvement is desired, provide means to deal with storm water runoff, and particularly those areas that pose a threat to already remediated properties.

I14-6 5. Identify the locations that need remediated, but first be clear on the definition of "need". Naturally occurring deposits of minerals and those that are not in danger of migrating into the waterways do not need to be remediated.

I14-7 6. My number 5 identifies a critical point that needs to be clarified and respected by the EPA. The actual living industry of mining in the Silver Valley. Like it or not, mining exists in the Silver Valley because there are naturally occurring deposits of minerals that we as a country consume and they can be extracted RESPONSIBLY today at a profit. Mining deserves to be respected as a viable industry in the region and the EPA has no right to discourage, hinder or impede this responsible industry regulated under statutes other than CERCLA and the EPA. Active mining properties should be exempt from EPA control in any manner and should only be considered by the EPA after final closure of the mining property

I14-8 The lack of acknowledgment by the EPA that the residents of this community have a right to live here, work in the mining industry and recreate in our yards and backyards is very arrogant. Attempting to shove "The Proposed Plan" down the throat of the community by not allowing adequate response time is essentially saying; "You and your opinions don't count. We don't care what you have to say. We will make you go away. You don't exist." The EPA is once again proving itself to be a rude and arrogant entity of the federal government.

896738

Response to comment I14-1
See response to Comment No. I54-6.

Response to comment I14-2
See responses to Comment Nos. I58-1 and I58-4.

Response to comment I14-3
EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. See response to Comment No. I295-2.

Response to comment I14-4
See response to Comment No. I54-8.

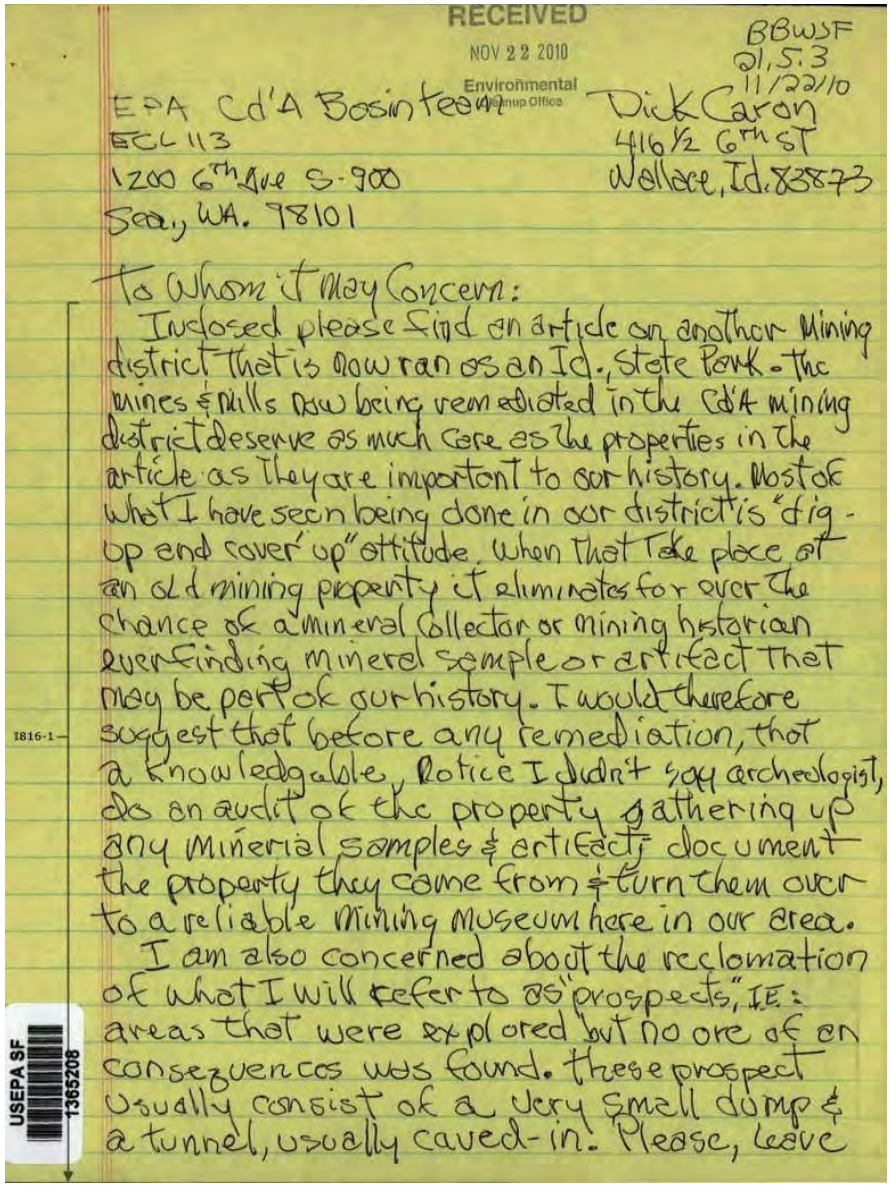
Response to comment I14-5
See response to Comment No. I54-5.

Response to comment I14-6
Regarding background concentrations, see response to Comment No. LC33-8.

Response to comment I14-7
See response to Comment No. I58-5.

Response to comment I14-8
See responses to Comment Nos. I54-6 and I295-2.

Caron, Dick, I816, Letter 1365208



RECEIVED
NOV 22 2010
Environmental Cleanup Office

BBWSF
21,5.3
11/22/10

EPA Cd'A Basin team
ECL 113
1200 6th Ave S-900
Seay, WA. 98101

Dick Caron
416½ 6th St
Wallace, Id. 83873

To Whom it May Concern:

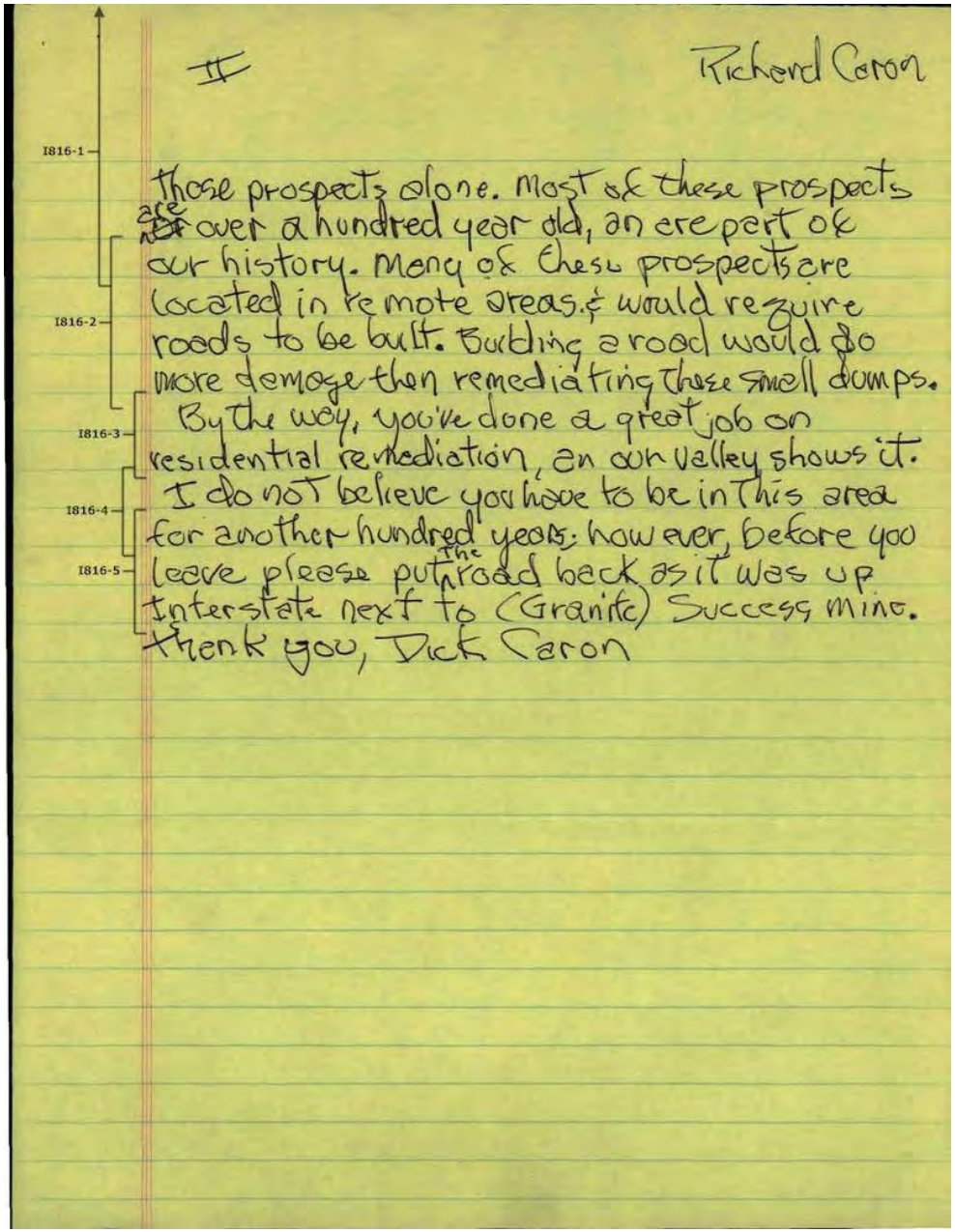
Inclosed please find an article on another Mining district that is now ran as an Id., State Park. The mines & mills now being remediated in the Cd'A mining district deserve as much care as the properties in the article as they are important to our history. Most of what I have seen being done in our district is "dig-up and cover up" attitude. When that take place at an old mining property it eliminates for ever the chance of a mineral collector or mining historian ever finding mineral sample or artifact that may be part of our history. I would therefore I816-1 suggest that before any remediation, that a knowledgable, Notice I didn't say archeologist, do an audit of the property gathering up any mineral samples & artifacts document the property they came from & turn them over to a reliable mining museum here in our area.

I am also concerned about the reclomation of what I will refer to as "prospects", I.E.: areas that were explored but no ore of en consequencos was found. these prospect usually consist of a very small dump & a tunnel, usually caved-in. Please, leave

USEPA SF 1365208

Response to comment I816-1

Thank you for your comment. See responses to Comment Nos. I822-14 and I822-11.


II

Richard Caron

I816-1 those prospects alone. Most of these prospects are not over a hundred year old, an ere part of our history. Many of these prospects are located in remote areas & would require roads to be built. Building a road would do more damage than remediating these small dumps.

I816-2 By the way, you've done a great job on residential remediation, an our valley shows it.

I816-3 I do not believe you have to be in this area for another hundred years; however, before you leave please put the road back as it was up Interstate next to (Granite) Success mine.

I816-4 Thank you, Dick Caron

I816-5

Response to comment I816-2
See response to Comment No. I822-14.

Response to comment I816-3
Thank you for your comment.

Response to comment I816-4
See response to Comment No. I58-1.

Response to comment I816-5
Comment noted. The Selected Remedy includes funding for constructing roads to access sites and to repair damage to existing roads due to cleanup activities. In this particular case re-establishment of the road along the East Fork of Ninemile Creek at the Success site will occur as part of the work in this area during the summer of 2012.

above, the road approaches the town with weathered wood buildings on the right. Some of them are in better shape than others. The most noticeable structure is the large, well-preserved mill building. Built on a steep slope comparable to the old wooden mines in Silver Valley near Kellogg, the eyes quickly scan below to a cluster of buildings that are the remains of a small town. No one lives there now, and the town of Bayhorse has been preserved and protected as a historical Idaho State Park.

MIKE BRODWATER

Historical it is. It is one thing to read about Idaho's mining history and quite another to actually walk through an old mining town. The street is narrow, dusty and rough. The homes don't look very comfortable. They are small but functional. The hotel has two stories, the rooms look very small. There are a few homes, now without roofs, built from local rocks into the hillside. Yet, the rock-sided homes and some of the mine buildings show true craftsmanship as if they were constructed by experienced masons. In fact the rockwork could be described as beautiful.

It had to be an ordeal just getting there while standing among these buildings clustered in the barren, dry, steep, rocky canyon still isolated in east-central Idaho.

The town's people had to build shelter, find food and carry in mining tools. Even if they found ore, it would have to be shipped out the same way they had come in. They persevered, found good ore and built a town below the mill where the ore was crushed and concentrated. The mining company developed a way to crush and grind the ore and a small smelter to recover the silver.

But in the end the logistics of transportation of food and equipment into the isolated town and taking the ore out proved to be too expensive in the long run. Bayhorse died a slow death as the economic realities became obvious. The original prospector's name has been lost over time, but his two bay horses haven't. He told others of an outcropping with silver and lead, and they marked the creek he had worked his way down. Later, they came back to that creek that they called Bayhorse, and ore was eventually found up the creek in the rugged canyon. Word got out about their find and a rush occurred with miners, businessmen and outfitters showing up and creating a small town with a population of 300 to 500.

The years of 1882 into the 1890s were the best when $10 million of minerals, in the form of silver and copper, were extracted from the area. A few workers lingered into the 1900s, as ore concentration technology improved and the town experienced a series of small revivals only to die again. The private property was gated and the public did not have access.

In 2006 the area became an Idaho State Park. The toxic area at the site was covered with soil and the buildings fenced off to create a safety zone. A parking lot was constructed over a contaminated area and interpretive signs provide the interesting history of many of the buildings.

The buildings resonate from another time. There was a time when snow blocked this place for months at a time. Miners were trapped in the area and had to survive on their own during the severe winter storms and cold. There is no doubt, after visiting the town, that only the toughest and most tenacious individuals could make this their home. Who knows, maybe a ghost or two remain to watch over the town at night. Here is a place to explore only during the day.

Bayhorse is as isolated as it sounds. The destination is a day's drive one way. A good location for an overnight stay is Salmon, Idaho.

PHOTOS BY MIKE BRODWATER Special to Hendle Extra

The ghost town of Bayhorse was once a lively community with a population of 300 to 500. The historic town offers a weathered "downtown," with homes and a hotel in various states of decline. On a hill above the town several preserved buildings provided the means of grinding and processing the silver ore.

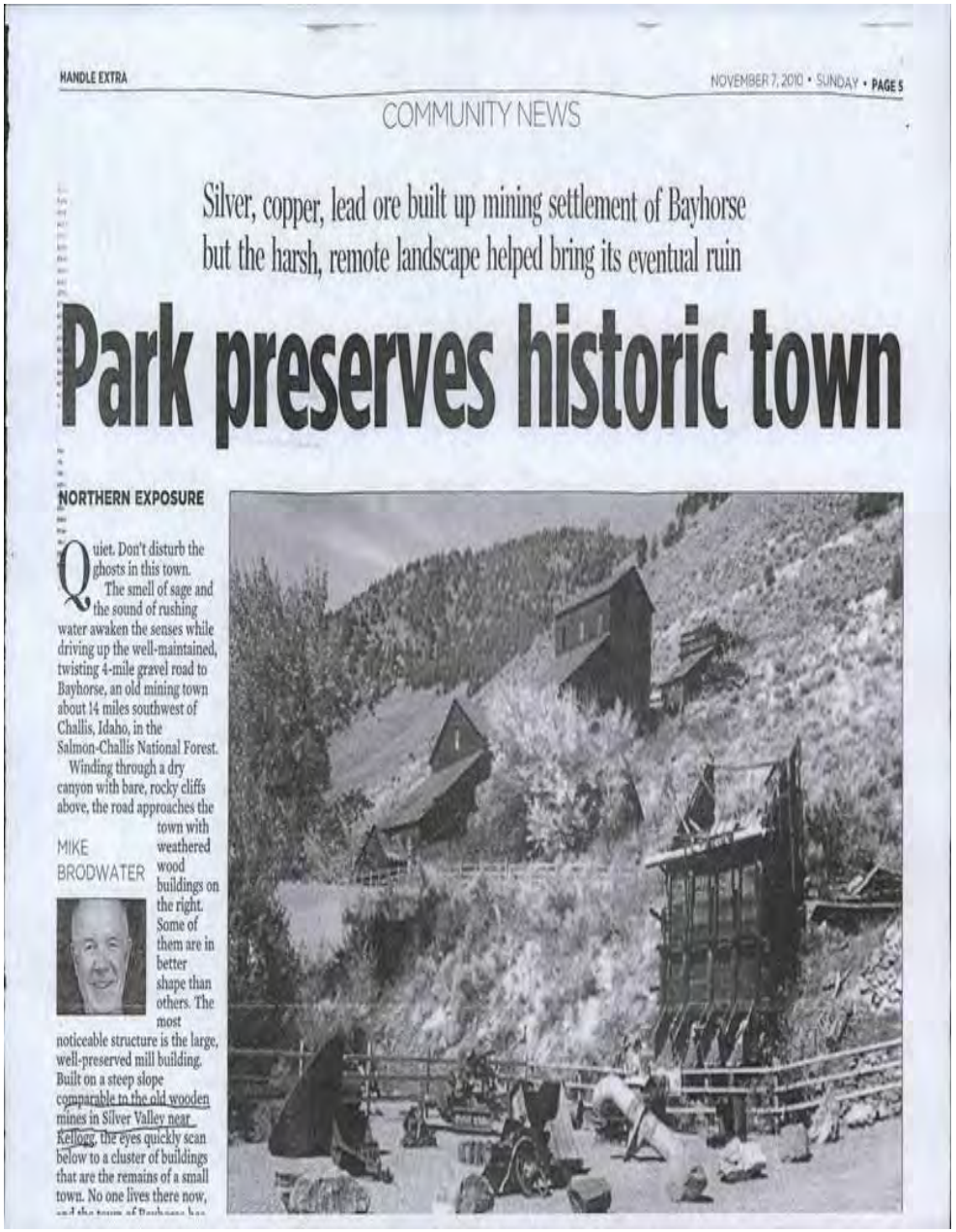
There are many old homes to be found in Bayhorse. Several are well-preserved while others have collapsed into a piles of lumber.

BAYHORSE STATE PARK

If you go

Season: Late spring, summer and early fall
Fee: $5 day use for state parks
On the Web: parksandrecreation.idaho.gov/parks/yankeefork.aspx
Phone: (208) 879-5244
Distance from Coeur d'Alene: 380 miles
Other attractions: The area is full of mining history including the ghost towns of Bonanza, Custer, a gold dredge and a mining museum at Challis.

No comments



HANDLE EXTRA NOVEMBER 7, 2010 • SUNDAY • PAGE 5

COMMUNITY NEWS

Silver, copper, lead ore built up mining settlement of Bayhorse
but the harsh, remote landscape helped bring its eventual ruin

Park preserves historic town

NORTHERN EXPOSURE

MIKE BRODWATER

Quiet. Don't disturb the ghosts in this town.

The smell of sage and the sound of rushing water awaken the senses while driving up the well-maintained, twisting 4-mile gravel road to Bayhorse, an old mining town about 14 miles southwest of Challis, Idaho, in the Salmon-Challis National Forest.

Winding through a dry canyon with bare, rocky cliffs above, the road approaches the town with weathered wood buildings on the right. Some of them are in better shape than others. The most noticeable structure is the large, well-preserved mill building. Built on a steep slope comparable to the old wooden mines in Silver Valley near Kellogg, the eyes quickly scan below to a cluster of buildings that are the remains of a small town. No one lives there now,

No comments

Carpenter, Ann, I563, Letter 617565

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

ann.carpenter@remoteenergysolutions.net to: formsubmission 11/17/2010 04:03 PM

Sent by: Ann.Carpenter@Remoteenergysolutions.Net <ann.carpenter=remoteenergysolutions.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

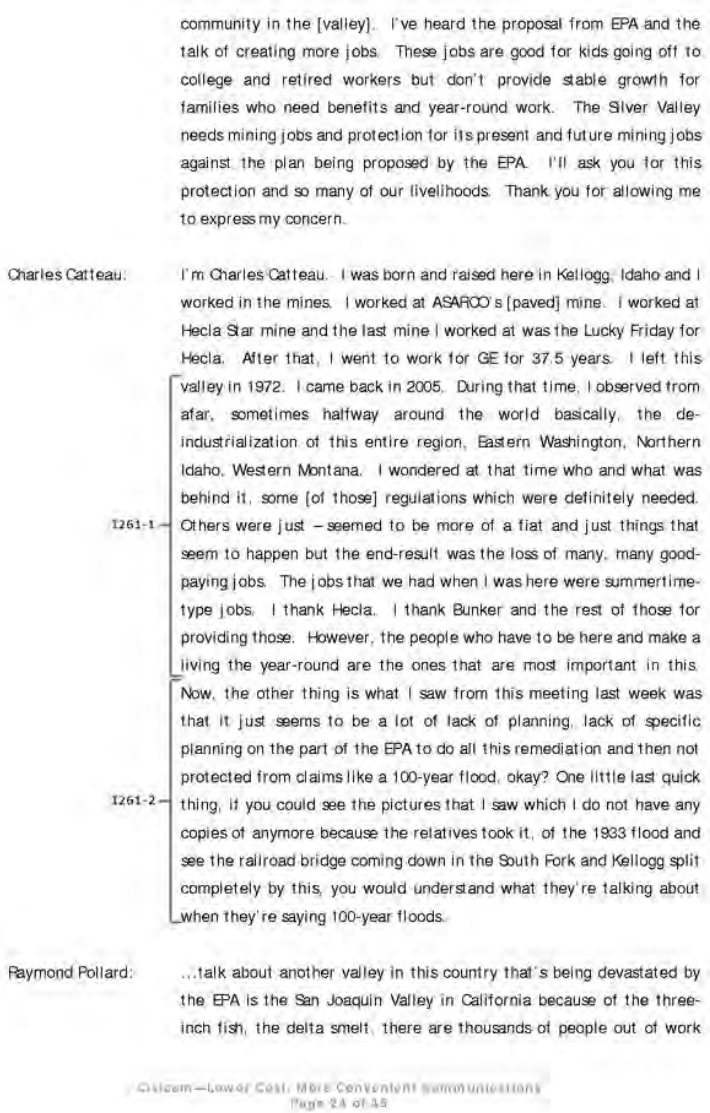
From: Ann Carpenter
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I563-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: ann.carpenter@remoteenergysolutions.net
Mailing Address: 5445 Goldenrod Drive|Reno|Nevada|89511|US
Phone Number: (775) 849-9707

617565

Response to comment I563-1

See response to Comment No. I351-1.

Catteau, Charles, I261, Letter 616015-24



community in the [valley]. I've heard the proposal from EPA and the talk of creating more jobs. These jobs are good for kids going off to college and retired workers but don't provide stable growth for families who need benefits and year-round work. The Silver Valley needs mining jobs and protection for its present and future mining jobs against the plan being proposed by the EPA. I'll ask you for this protection and so many of our livelihoods. Thank you for allowing me to express my concern.

Charles Catteau: I'm Charles Catteau. I was born and raised here in Kellogg, Idaho and I worked in the mines. I worked at ASARCO's [paved] mine. I worked at Hecla Star mine and the last mine I worked at was the Lucky Friday for Hecla. After that, I went to work for GE for 37.5 years. I left this valley in 1972. I came back in 2005. During that time, I observed from afar, sometimes halfway around the world basically, the de-industrialization of this entire region, Eastern Washington, Northern Idaho, Western Montana. I wondered at that time who and what was behind it, some [of those] regulations which were definitely needed. Others were just – seemed to be more of a fiat and just things that seem to happen but the end-result was the loss of many, many good-paying jobs. The jobs that we had when I was here were summertime-type jobs. I thank Hecla. I thank Bunker and the rest of those for providing those. However, the people who have to be here and make a living the year-round are the ones that are most important in this. Now, the other thing is what I saw from this meeting last week was that it just seems to be a lot of lack of planning, lack of specific planning on the part of the EPA to do all this remediation and then not protected from claims like a 100-year flood, okay? One little last quick thing, if you could see the pictures that I saw which I do not have any copies of anymore because the relatives took it, of the 1933 flood and see the railroad bridge coming down in the South Fork and Kellogg split completely by this, you would understand what they're talking about when they're saying 100-year floods.

I261-1

I261-2

Raymond Pollard: ...talk about another valley in this country that's being devastated by the EPA is the San Joaquin Valley in California because of the three-inch fish, the delta smelt, there are thousands of people out of work

Citizen—Lower Cost, More Convenient Communications
Page 24 of 35

Response to comment I261-1

Thank you for your comment.

Response to comment I261-2

Comprehensive flood control is a complex multi-jurisdictional issue that exceeds the expertise and regulatory authority of EPA's CERCLA cleanup program. EPA is eager to ensure the long-term performance of the Selected Human Health Remedies. EPA is therefore committed to working with local, state, and federal entities with an interest in SFCDR flood issues and, consistent with EPA's authority, to help craft solutions. EPA can and will contribute to efforts to understand SFCDR flooding and, if these efforts identify actions that will meet Superfund remedy requirements, EPA will define and select these activities in future decision documents. CERCLA requires that EPA's contribution to flood control work must have a direct connection to the CERCLA remedy.

Chaffin, Gary, I361, Letter 616247

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
gtreekiller@aol.com to: formsubmission 11/12/2010 07:59 AM
Sent by: Gtreekiller@Aol.Com <gtreekiller=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Gary L Chaffin
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I361-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: gtreekiller@aol.com
Mailing Address: 25 N 470 W|Blackfoot|ID|83221|US
Phone Number: (208) 785-4294

616247

Response to comment I361-1

See response to Comment No. I351-1.

Chambers, I564, Letter 617566

Page 1 of 1

Silver Valley cleanup
Chambers
to:
CDABasin
11/23/2010 10:23 AM
Show Details

The EPA performance and cleanup

I564-1 ..Putting hazardous waste in a flood plain

I564-2 ..Removing contaminated gravel from from driveways that had been put there by a company and then replaced by the same company

..Going back over a property again after it had been cleared a few years before

..Redundancy

I564-3 ..How much more of our tax dollars are you going to spend?

I564-4 ..Let the land now grow back as it did after Mt.St. Helen's.

I564-5 ..Did anyone think to check the levels of metals before mining?----Check the building material from the 1800's in the Old Mission at Cataldo.

I564-6 --The EPA is now doing more harm than good.

617566

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web4849.... 11/24/2010

Response to comment I564-1
This comment is interpreted as primarily referring to the East Mission Flats repository and the potential for other regional repositories to be constructed. See response to Comment No. LC21-9.

Response to comment I564-2
See response to Comment No. I521-8.

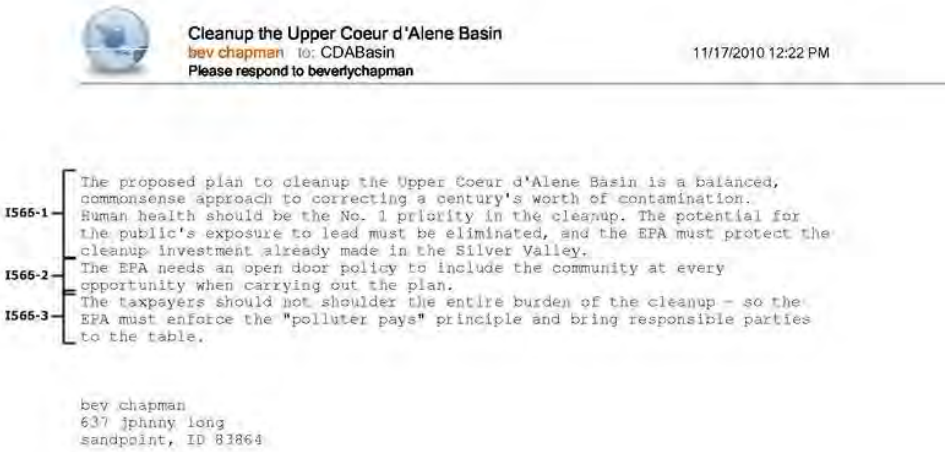
Response to comment I564-3
See response to Comment No. I58-2.

Response to comment I564-4
Comment noted.

Response to comment I564-5
Comment noted. See response to Comment No. LC33-8.

Response to comment I564-6
Comment noted.

Chapman, Bev, I565, Letter 617567



Cleanup the Upper Coeur d'Alene Basin
bev chapman to: CDABasin 11/17/2010 12:22 PM
Please respond to beverlychapman

I565-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I565-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I565-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

bev chapman
637 jphnny long
sandpoint, ID 83864

617567

Response to comment I565-1

See response to Comment No. I295-1.

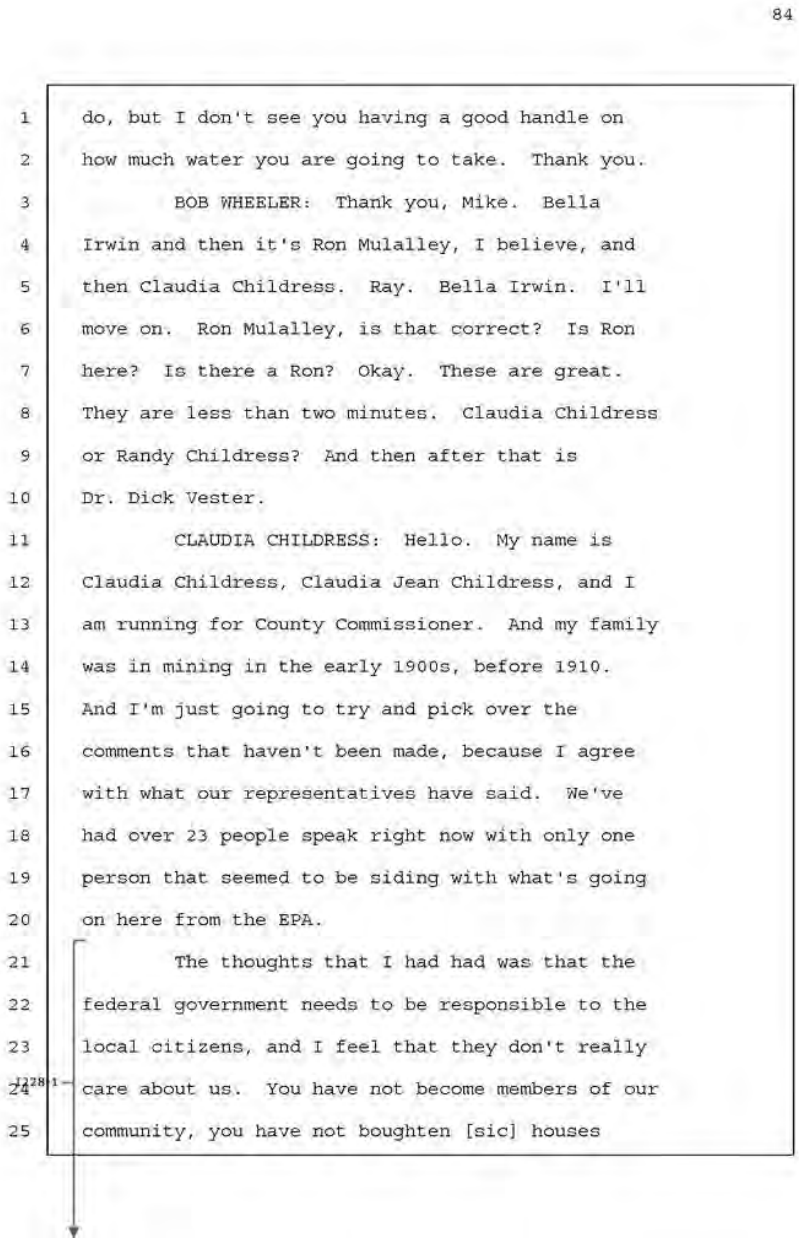
Response to comment I565-2

See response to Comment No. I295-2.

Response to comment I565-3

See response to Comment No. I295-3.

Childress, Claudia, I228, Letter 610097-23



84

do, but I don't see you having a good handle on how much water you are going to take. Thank you.

BOB WHEELER: Thank you, Mike. Bella Irwin and then it's Ron Mulalley, I believe, and then Claudia Childress. Ray. Bella Irwin. I'll move on. Ron Mulalley, is that correct? Is Ron here? Is there a Ron? Okay. These are great. They are less than two minutes. Claudia Childress or Randy Childress? And then after that is Dr. Dick Vester.

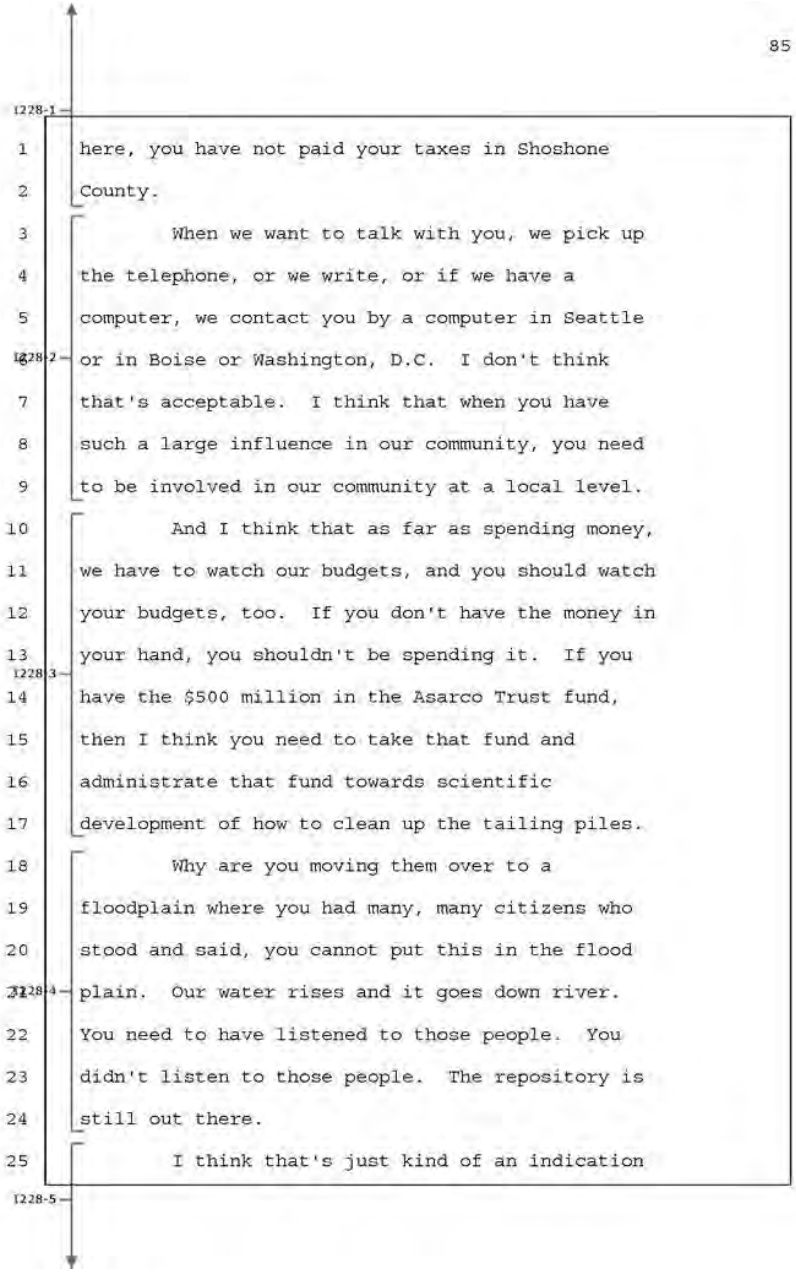
CLAUDIA CHILDRESS: Hello. My name is Claudia Childress, Claudia Jean Childress, and I am running for County Commissioner. And my family was in mining in the early 1900s, before 1910. And I'm just going to try and pick over the comments that haven't been made, because I agree with what our representatives have said. We've had over 23 people speak right now with only one person that seemed to be siding with what's going on here from the EPA.

The thoughts that I had had was that the federal government needs to be responsible to the local citizens, and I feel that they don't really care about us. You have not become members of our community, you have not boughten [sic] houses

I228-1

Response to comment I228-1

Thank you for your comment.



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I228-1

here, you have not paid your taxes in Shoshone County.

When we want to talk with you, we pick up the telephone, or we write, or if we have a computer, we contact you by a computer in Seattle or in Boise or Washington, D.C. I don't think that's acceptable. I think that when you have such a large influence in our community, you need to be involved in our community at a local level.

I228-2

And I think that as far as spending money, we have to watch our budgets, and you should watch your budgets, too. If you don't have the money in your hand, you shouldn't be spending it. If you have the $500 million in the Asarco Trust fund, then I think you need to take that fund and administrate that fund towards scientific development of how to clean up the tailing piles.

I228-3

Why are you moving them over to a floodplain where you had many, many citizens who stood and said, you cannot put this in the flood plain. Our water rises and it goes down river. You need to have listened to those people. You didn't listen to those people. The repository is still out there.

I228-4

I think that's just kind of an indication

I228-5

Response to comment I228-2

EPA agrees that it is helpful to have a community liaison available in the local area. In March 2011, EPA hired (through the "SEE" program) a local resident to serve this role. That individual later accepted a different position, resigning in 2012. The agency has recently been looking into options for re-establishing the position and is now moving forward with filling this position with someone from the local community. In addition, several local resources are available. EPA maintains a field office in Coeur d'Alene, staffed with a key local contact for the cleanup. The office of the Coeur d'Alene Trust, heavily involved in cleanup work, is located in Kellogg. Also, the State Department of Environmental Quality has an office in Kellogg, staffed with people working on the cleanup. EPA encourages citizens to contact cleanup staff any time with questions or concerns.

Response to comment I228-3

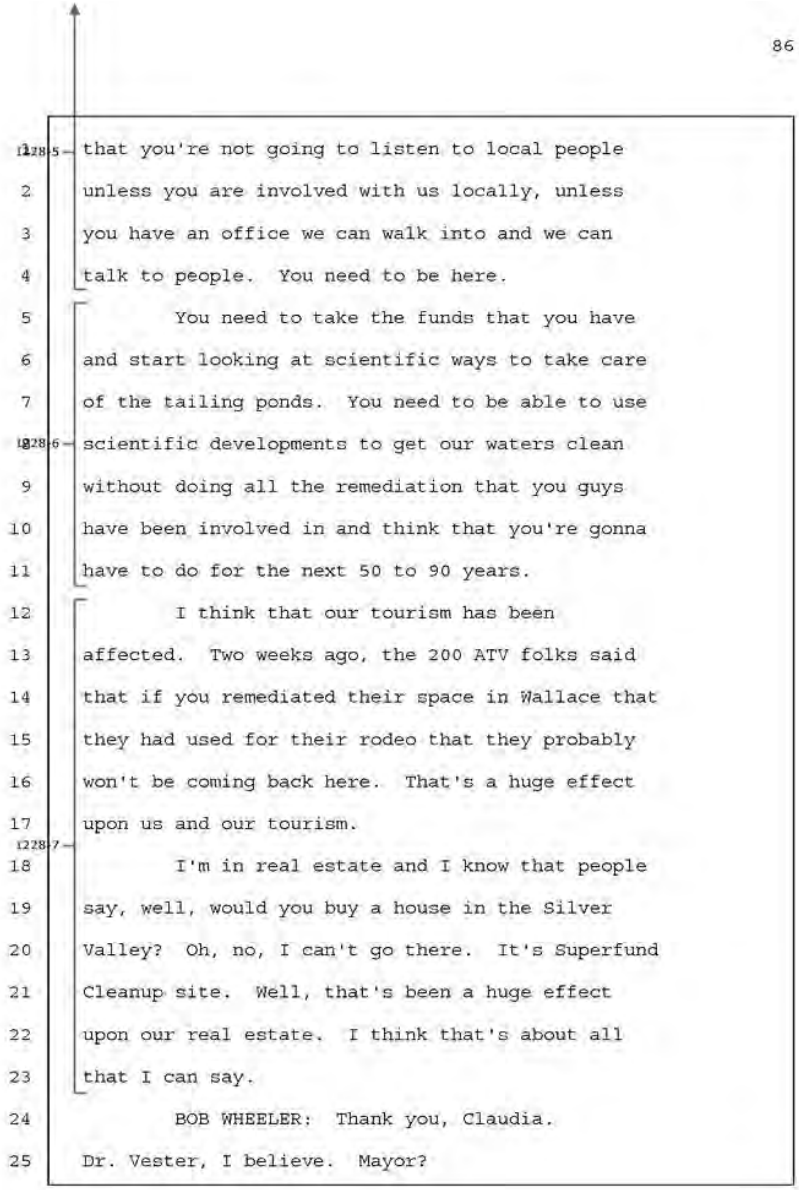
See response to Comment No. I295-3.

Response to comment I228-4

See response to Comment No. LC21-9.

Response to comment I228-5

EPA agrees that it is helpful to have a community liaison available in the local area. In March 2011, EPA hired (through the "SEE" program) a local resident to serve this role. That individual later accepted a different position, resigning in 2012. The agency has recently been looking into options for re-establishing the position and is now moving forward with filling this position with someone from the local community. In addition, several local resources are available. EPA maintains a field office in Coeur d'Alene, staffed with a key local contact for the cleanup. The office of the Coeur d'Alene Trust, heavily involved in cleanup work, is located in Kellogg. Also, the State Department of Environmental Quality has an office in Kellogg, staffed with people working on the cleanup. EPA encourages citizens to contact cleanup staff any time with questions or concerns.



86

that you're not going to listen to local people unless you are involved with us locally, unless you have an office we can walk into and we can talk to people. You need to be here.

You need to take the funds that you have and start looking at scientific ways to take care of the tailing ponds. You need to be able to use scientific developments to get our waters clean without doing all the remediation that you guys have been involved in and think that you're gonna have to do for the next 50 to 90 years.

I think that our tourism has been affected. Two weeks ago, the 200 ATV folks said that if you remediated their space in Wallace that they had used for their rodeo that they probably won't be coming back here. That's a huge effect upon us and our tourism.

I'm in real estate and I know that people say, well, would you buy a house in the Silver Valley? Oh, no, I can't go there. It's Superfund Cleanup site. Well, that's been a huge effect upon our real estate. I think that's about all that I can say.

BOB WHEELER: Thank you, Claudia. Dr. Vester, I believe. Mayor?

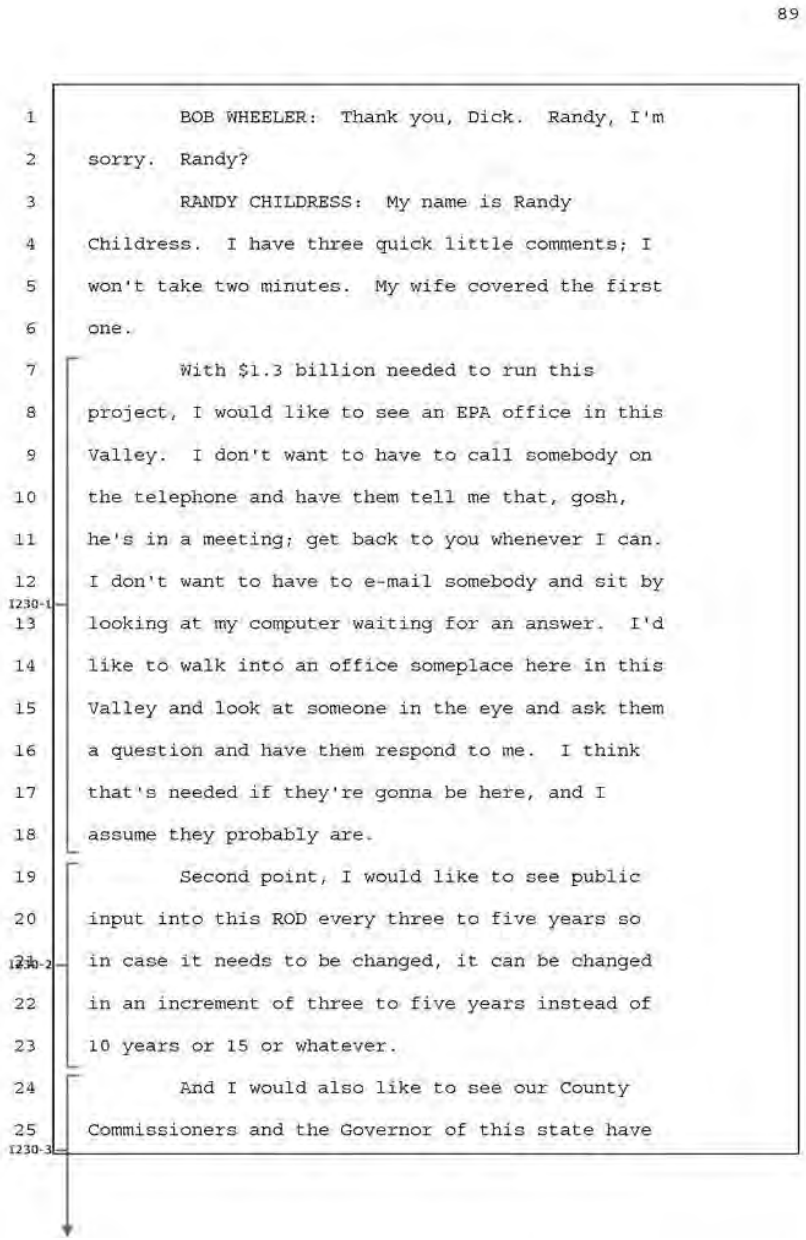
Response to comment I228-6

As documented in the ROD Amendment, the Selected Remedy was developed based on significant data collection and pre-remediation studies. A considerable body of information is now available for updating prior analyses, developing and evaluating enhanced remedial alternatives, and selecting a remedy for the Upper Basin. The resulting information indicates that it is necessary to augment the established remedies to ensure continued protection of human health and the environment in the Upper Basin. These studies include a review by the National Research Council in 2005.

Response to comment I228-7

See response to Comment No. I474-1.

Childress, Randy, I230, Letter 610097-25



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BOB WHEELER: Thank you, Dick. Randy, I'm sorry. Randy?

RANDY CHILDRESS: My name is Randy Childress. I have three quick little comments; I won't take two minutes. My wife covered the first one.

With $1.3 billion needed to run this project, I would like to see an EPA office in this Valley. I don't want to have to call somebody on the telephone and have them tell me that, gosh, he's in a meeting; get back to you whenever I can. I don't want to have to e-mail somebody and sit by looking at my computer waiting for an answer. I'd like to walk into an office someplace here in this Valley and look at someone in the eye and ask them a question and have them respond to me. I think that's needed if they're gonna be here, and I assume they probably are.

I230-1

Second point, I would like to see public input into this ROD every three to five years so in case it needs to be changed, it can be changed in an increment of three to five years instead of 10 years or 15 or whatever.

I230-2

And I would also like to see our County Commissioners and the Governor of this state have

I230-3

Response to comment I230-1

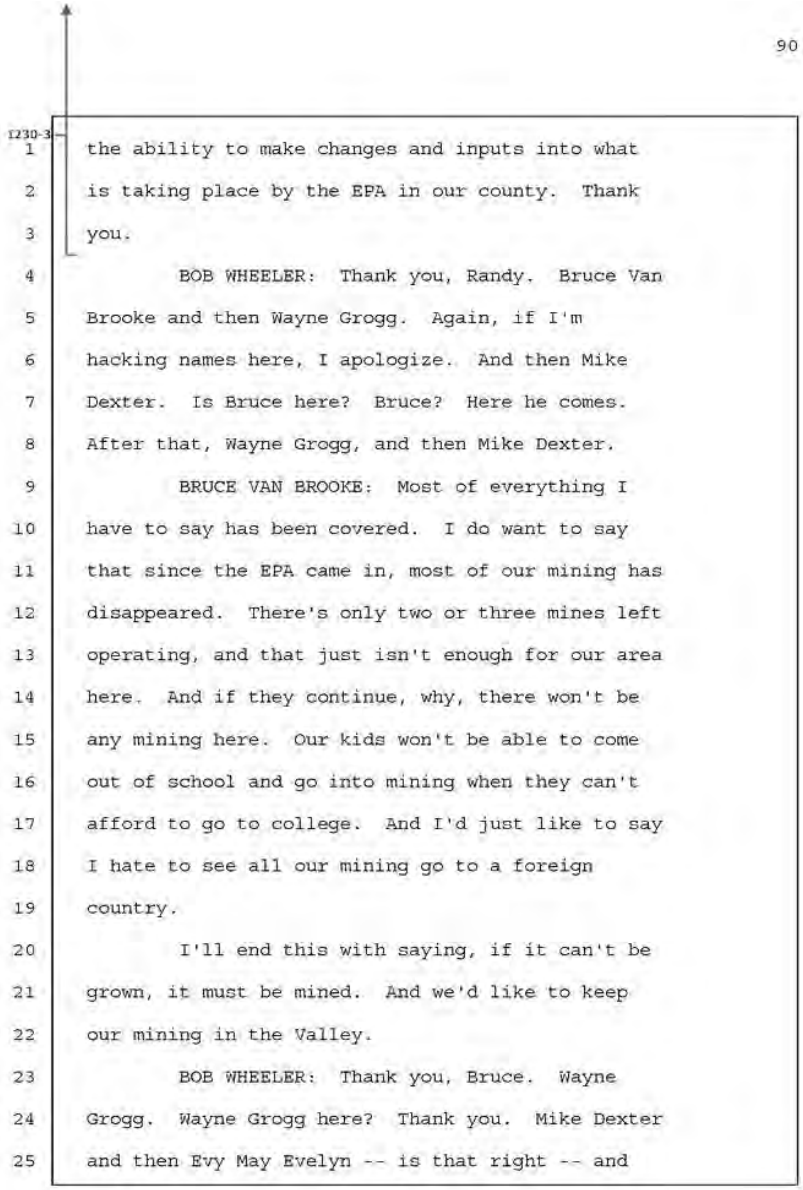
EPA agrees that it is helpful to have a community liaison available in the local area. In March 2011, EPA hired (through the "SEE" program) a local resident to serve this role. That individual later accepted a different position, resigning in 2012. The agency has recently been looking into options for re-establishing the position and is now moving forward with filling this position with someone from the local community. In the meantime, several local resources are available. EPA maintains a field office in Coeur d'Alene, staffed with a key local contact for the cleanup. The office of the Coeur d'Alene Trust, heavily involved in cleanup work, is located in Kellogg. Also, the State Department of Environmental Quality has an office in Kellogg, staffed with people working on the cleanup. EPA encourages citizens to contact cleanup staff any time with questions or concerns.

Response to comment I230-2

See response to Comment No. LJ11-2.

Response to comment I230-3

See response to Comment No. LJ39-5.



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I230-3

the ability to make changes and inputs into what is taking place by the EPA in our county. Thank you.

BOB WHEELER: Thank you, Randy. Bruce Van Brooke and then Wayne Grogg. Again, if I'm hacking names here, I apologize. And then Mike Dexter. Is Bruce here? Bruce? Here he comes. After that, Wayne Grogg, and then Mike Dexter.

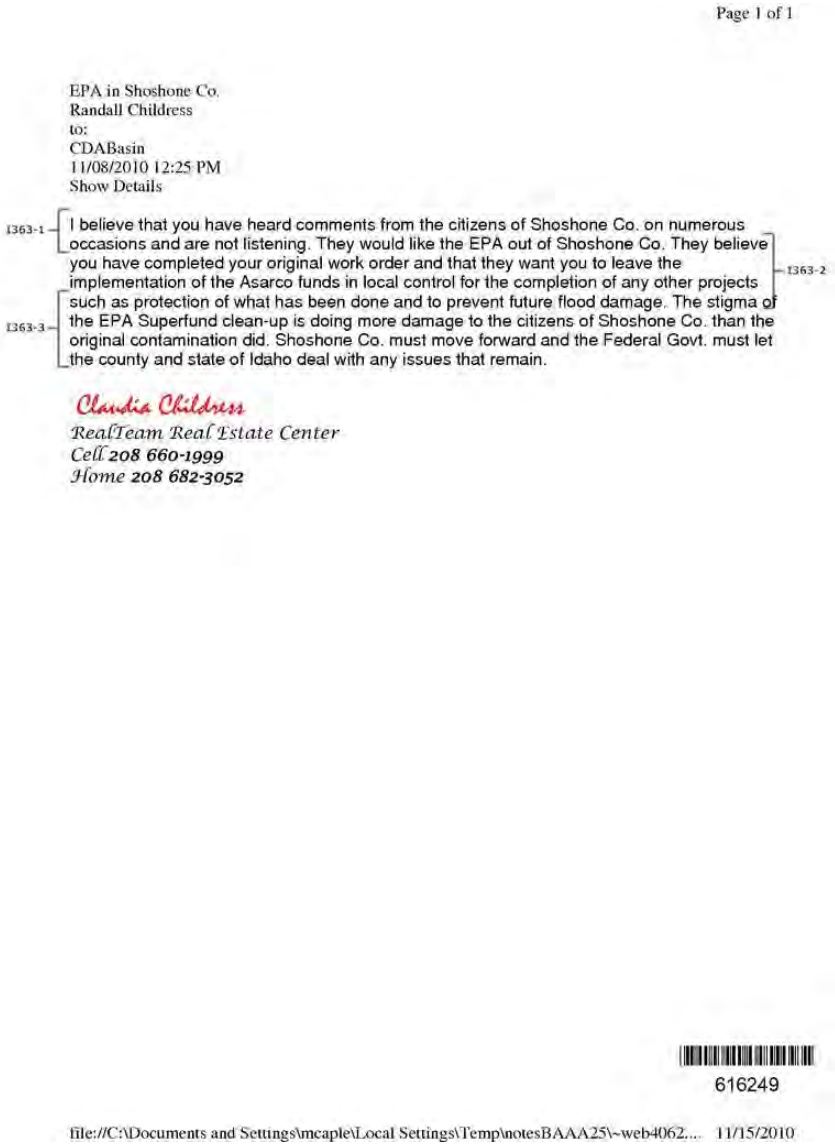
BRUCE VAN BROOKE: Most of everything I have to say has been covered. I do want to say that since the EPA came in, most of our mining has disappeared. There's only two or three mines left operating, and that just isn't enough for our area here. And if they continue, why, there won't be any mining here. Our kids won't be able to come out of school and go into mining when they can't afford to go to college. And I'd just like to say I hate to see all our mining go to a foreign country.

I'll end this with saying, if it can't be grown, it must be mined. And we'd like to keep our mining in the Valley.

BOB WHEELER: Thank you, Bruce. Wayne Grogg. Wayne Grogg here? Thank you. Mike Dexter and then Evy May Evelyn -- is that right -- and

No comments

Childress, Randall, I363, Letter 616249



Page 1 of 1

EPA in Shoshone Co.
Randall Childress
to:
CDABasin
11/08/2010 12:25 PM
Show Details

I363-1 I believe that you have heard comments from the citizens of Shoshone Co. on numerous occasions and are not listening. They would like the EPA out of Shoshone Co. They believe you have completed your original work order and that they want you to leave the implementation of the Asarco funds in local control for the completion of any other projects such as protection of what has been done and to prevent future flood damage. The stigma of the EPA Superfund clean-up is doing more damage to the citizens of Shoshone Co. than the original contamination did. Shoshone Co. must move forward and the Federal Govt. must let the county and state of Idaho deal with any issues that remain. I363-2 I363-3

Claudia Childress
RealTeam Real Estate Center
Cell 208 660-1999
Home 208 682-3052

616249

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Response to comment I363-1

EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. See response to Comment No. I295-2.

Response to comment I363-2

EPA has a statutory obligation under CERCLA to protect human health and the environment. Regarding funding of the cleanup, see response to Comment Nos. I295-3.

Response to comment I363-3

Thank you for your comment.

Christensen, Todd, I257, Letter 616015-19

law and according to science and recognize that the Lower Basin still needs work. Thirty seconds. We understand the difficulty of the timeframe but we understand that this ROD properly and honestly describes the scope and scale of this problem. We're going to recommend procedures that will give input and collaboration so that the process moving forward is fair and reasonable and we get meaningful involvement but let's understand that this needs to become the - that the Lower Basin needs to be dealt with and...

Mayor Dick Vester: Senator Crapo, Governor Otter, members of the head table, other elected officials, friends and neighbors, I'm Dr. Dick Vester. I'm the Mayor of Wallace. I wish everybody could've been at the meeting last Wednesday in Smelterville. It was very enlightening. There were doctors and lawyers, hard rock miners and mining executives, retired people and college kids, Democrats and Republicans, yet the message sent to the EPA was almost unanimous and universal. The message sent was, "We don't want this thing to go on forever and we need a longer time to digest the information." I would ask our elected officials to use your clout and influence with the EPA for two things. It sounds like you've already accomplished one and that's to extend the comment period so that we have – our citizens have enough time to digest the approximately 2,400 pages of information. More importantly, I would ask you to use your influence to have this Record of Decision end in a maximum of ten years. We do not need our community to go through the devastation of being a Superfund site for 30 or 50 or 90 years so we ask your help and we hope the EPA will listen to the comments.

Todd Christensen: On July 26, we formally requested an extension to Administrator McLerran. Mr. Opalski, we appreciate the notification of such an extension. Additionally, we highlight the importance of additional review by the Idaho State Legislature as already outlined this evening specifically to have a full understanding on the current and future fiscal impact to the state for a plan that reaches between 50 to 90 years. We appreciate your consideration and I [yield] the balance of my time.

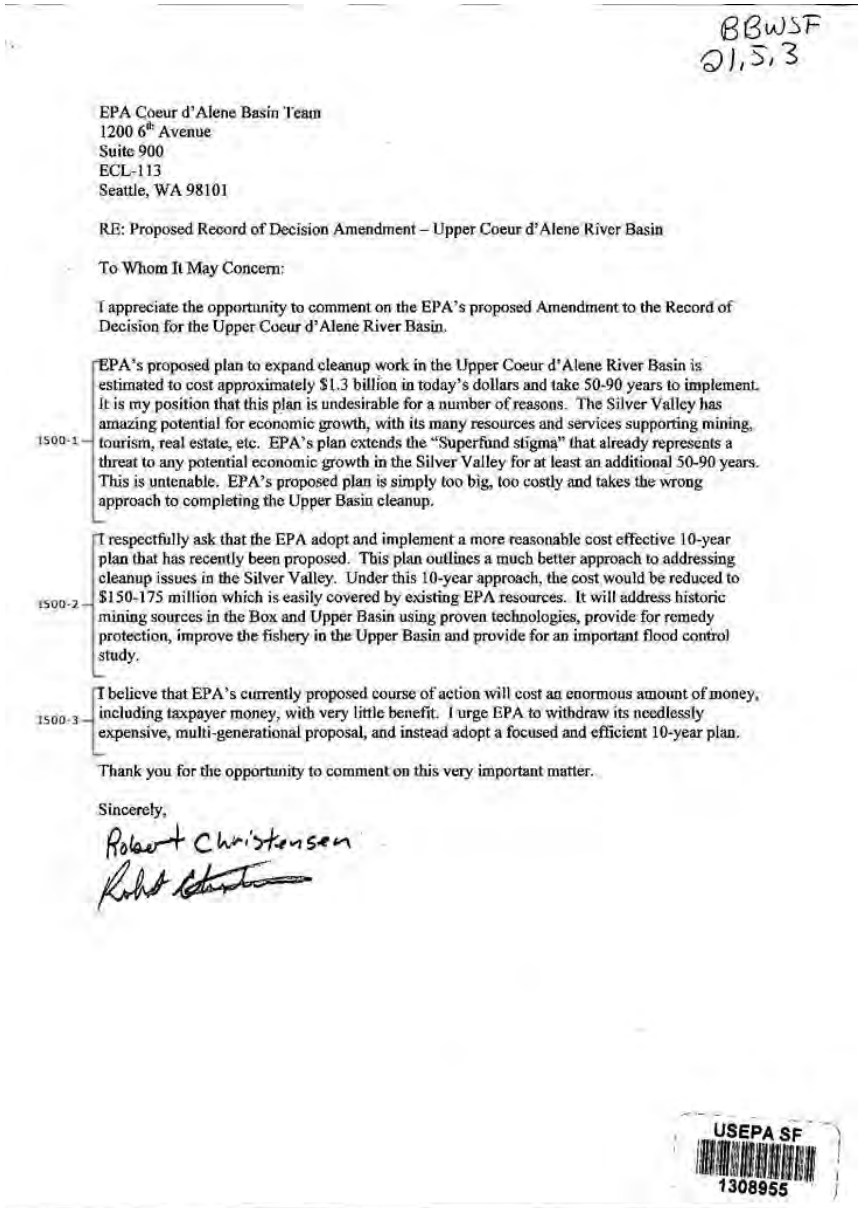
I257-1

Calcom—Lewis Oral Mark Comment Communications
Page 21 of 43

Response to comment I257-1

Comment noted and also see responses to Comment Nos. LJ39-5 and I58-1.

Christensen, Robert, I500, Letter 1308955



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I500-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I500-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I500-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Robert Christensen

USEPA SF
1308955

Response to comment I500-1

See response to Comment No. I474-1.

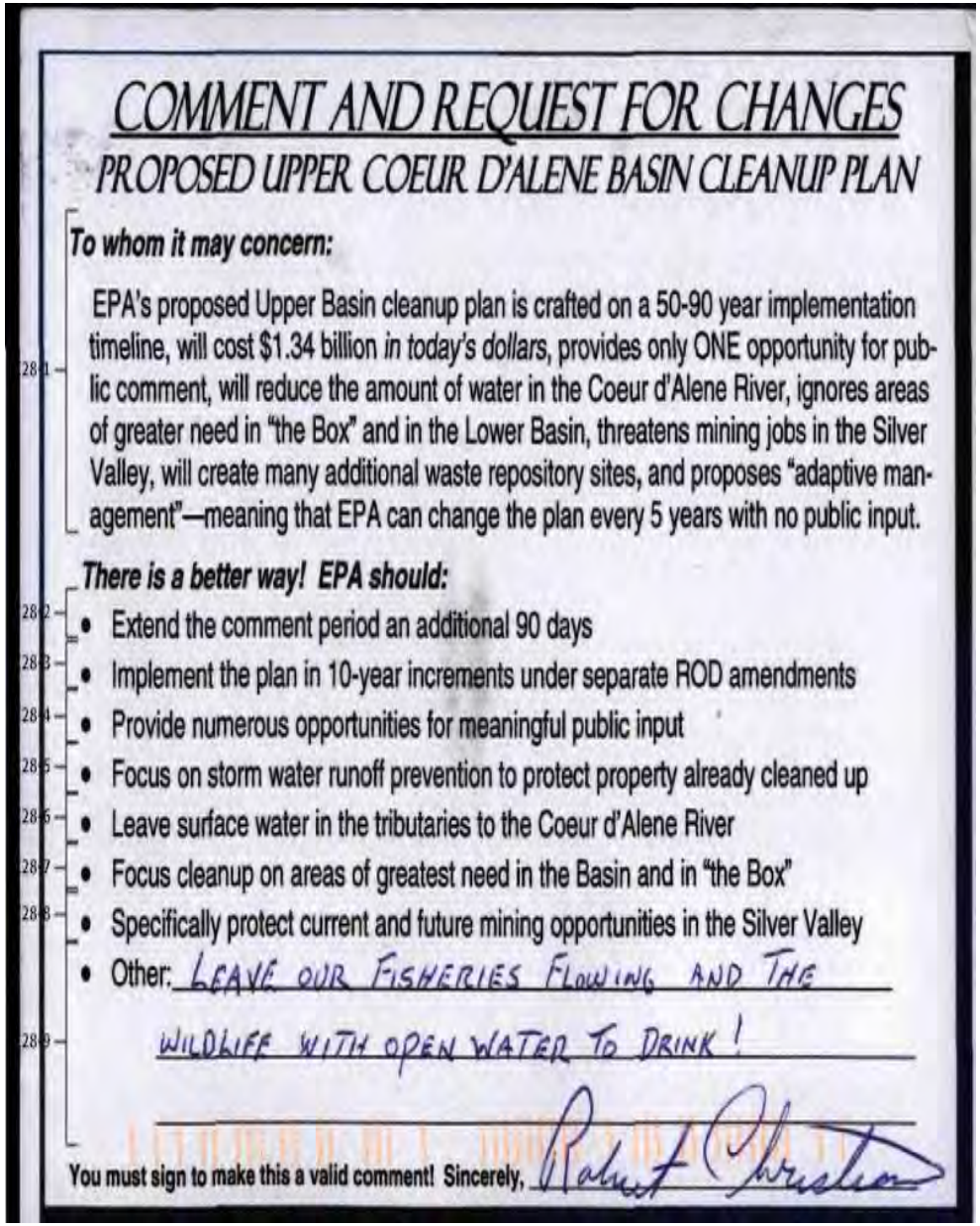
Response to comment I500-2

See response to Comment No. I474-2.

Response to comment I500-3

See response to Comment No. I474-3.

Christian, Robert, I28, Letter 1357072



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I28-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I28-2 Extend the comment period an additional 90 days
- I28-3 Implement the plan in 10-year increments under separate ROD amendments
- I28-4 Provide numerous opportunities for meaningful public input
- I28-5 Focus on storm water runoff prevention to protect property already cleaned up
- I28-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I28-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I28-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: LEAVE OUR FISHERIES FLOWING AND THE WILDLIFE WITH OPEN WATER TO DRINK! I28-9

You must sign to make this a valid comment! Sincerely, Robert Christian

Response to comment I28-1
See response to Comment No. I25-1.

Response to comment I28-2
See response to Comment No. I25-2.

Response to comment I28-3
See response to Comment No. I25-3.

Response to comment I28-4
See response to Comment No. I25-4.

Response to comment I28-5
See response to Comment No. I25-5.

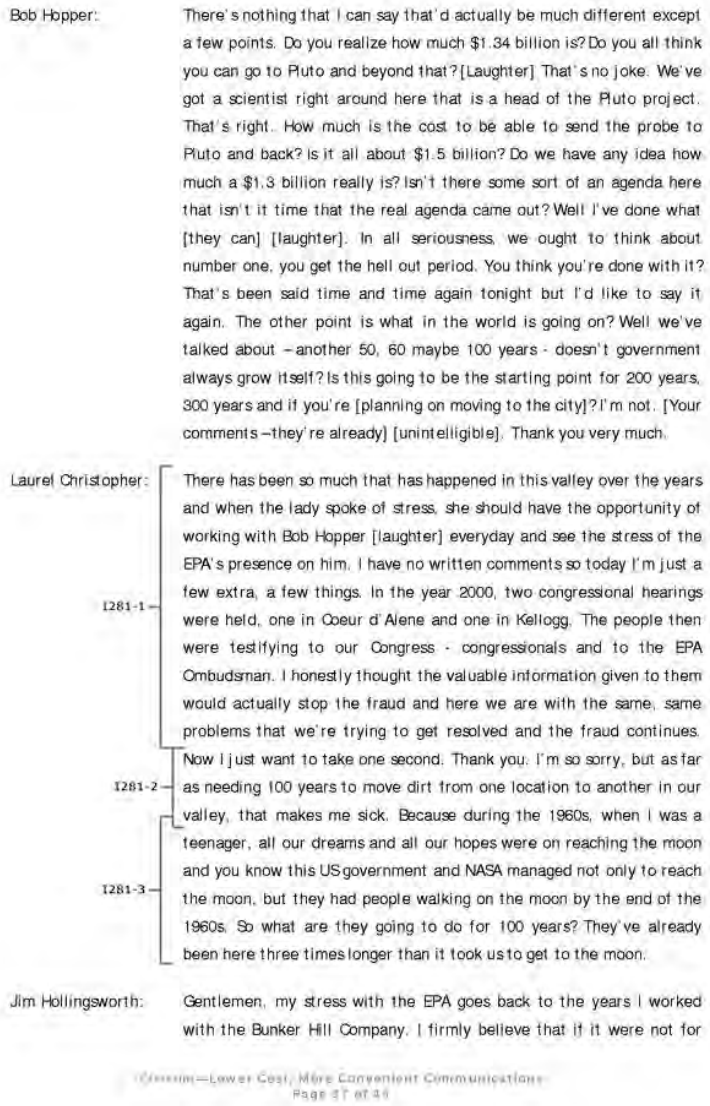
Response to comment I28-6
See response to Comment No. I25-6.

Response to comment I28-7
See response to Comment No. I25-7.

Response to comment I28-8
See response to Comment No. I25-8.

Response to comment I28-9
See response to Comment No. I54-8.

Christopher, Laurel, I281, Letter 616015-46



Bob Hopper: There's nothing that I can say that'd actually be much different except a few points. Do you realize how much $1.34 billion is? Do you all think you can go to Pluto and beyond that? [Laughter] That's no joke. We've got a scientist right around here that is a head of the Pluto project. That's right. How much is the cost to be able to send the probe to Pluto and back? Is it all about $1.5 billion? Do we have any idea how much a $1.3 billion really is? Isn't there some sort of an agenda here that isn't it time that the real agenda came out? Well I've done what [they can] [laughter]. In all seriousness, we ought to think about number one, you get the hell out period. You think you're done with it? That's been said time and time again tonight but I'd like to say it again. The other point is what in the world is going on? Well we've talked about – another 50, 60 maybe 100 years - doesn't government always grow itself? Is this going to be the starting point for 200 years, 300 years and if you're [planning on moving to the city]? I'm not. [Your comments –they're already] [unintelligible]. Thank you very much.

Laurel Christopher: There has been so much that has happened in this valley over the years and when the lady spoke of stress, she should have the opportunity of working with Bob Hopper [laughter] everyday and see the stress of the EPA's presence on him. I have no written comments so today I'm just a few extra, a few things. In the year 2000, two congressional hearings were held, one in Coeur d'Alene and one in Kellogg. The people then were testifying to our Congress - congressionals and to the EPA Ombudsman. I honestly thought the valuable information given to them would actually stop the fraud and here we are with the same, same problems that we're trying to get resolved and the fraud continues.

I281-1

Now I just want to take one second. Thank you. I'm so sorry, but as far as needing 100 years to move dirt from one location to another in our valley, that makes me sick. Because during the 1960s, when I was a teenager, all our dreams and all our hopes were on reaching the moon and you know this US government and NASA managed not only to reach the moon, but they had people walking on the moon by the end of the 1960s. So what are they going to do for 100 years? They've already been here three times longer than it took us to get to the moon.

I281-2

I281-3

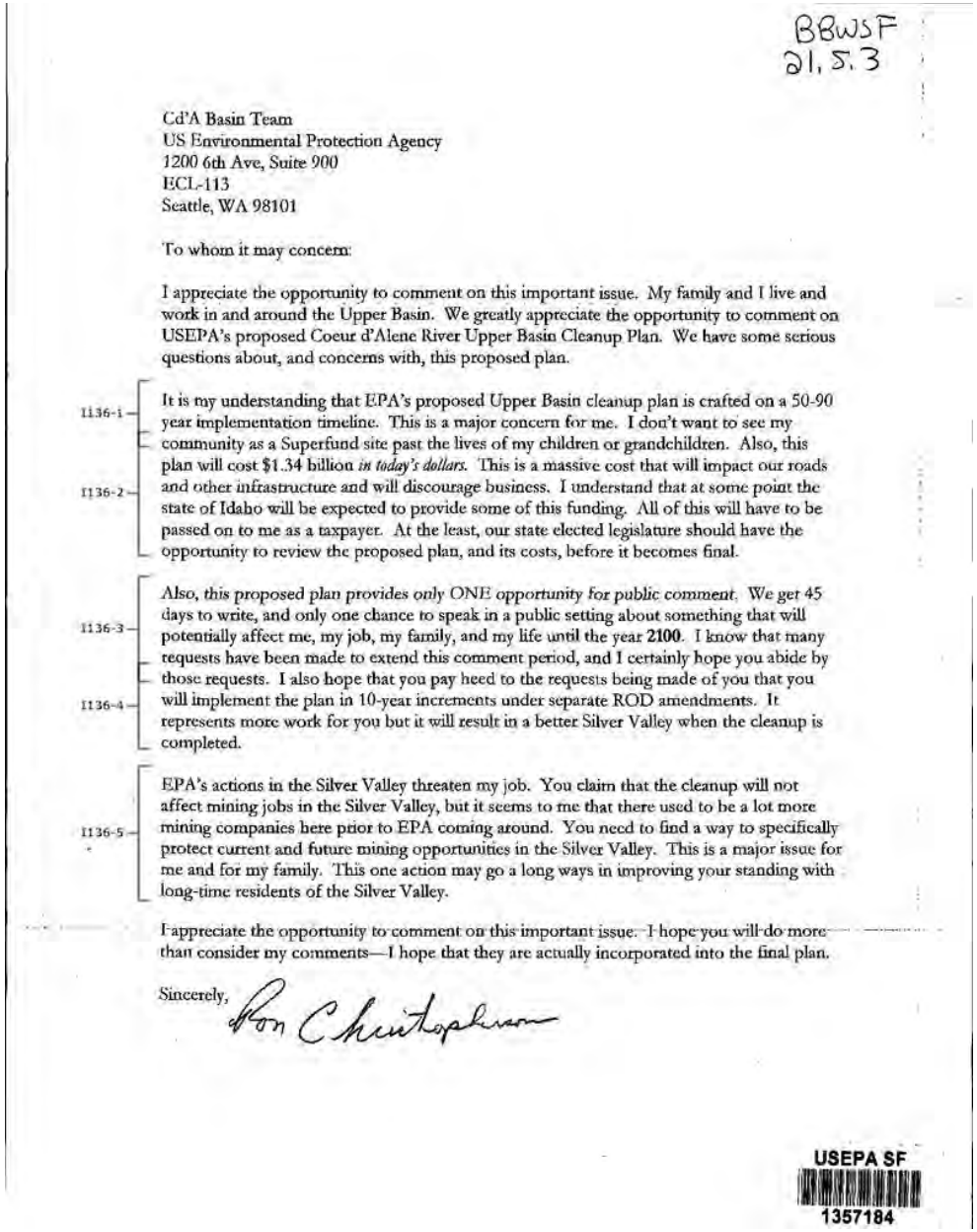
Jim Hollingsworth: Gentlemen, my stress with the EPA goes back to the years I worked with the Bunker Hill Company. I firmly believe that if it were not for

Response to comment I281-1
Comment noted.

Response to comment I281-2
See response to Comment No. I58-1.

Response to comment I281-3
Comment noted.

Christopherson, Ron, I136, Letter 1357184



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I136-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I136-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I136-3 Also, *this proposed plan provides only ONE opportunity for public comment*. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I136-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I136-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Ron Christopherson

USEPA SF
1357184

Response to comment I136-1
See response to Comment No. I58-1.

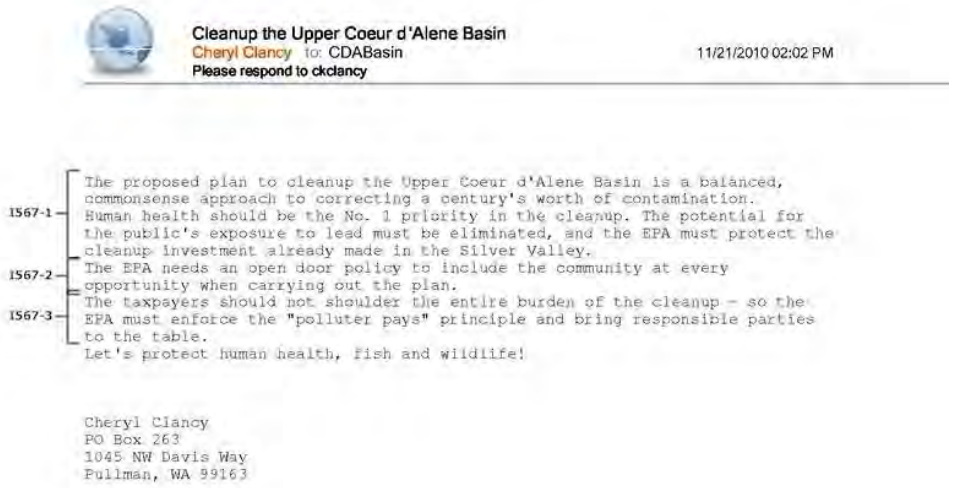
Response to comment I136-2
See response to Comment No. I58-2.

Response to comment I136-3
See response to Comment No. I58-3.

Response to comment I136-4
See response to Comment No. I58-4.

Response to comment I136-5
See response to Comment No. I58-5.

Clancy, Cheryl, I567, Letter 617570



Cleanup the Upper Coeur d'Alene Basin
Cheryl Clancy to: CDABasin 11/21/2010 02:02 PM
Please respond to ckclancy

I567-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I567-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I567-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Let's protect human health, fish and wildlife!

Cheryl Clancy
PO Box 263
1045 NW Davis Way
Pullman, WA 99163

617570

Response to comment I567-1

See response to Comment No. I295-1.

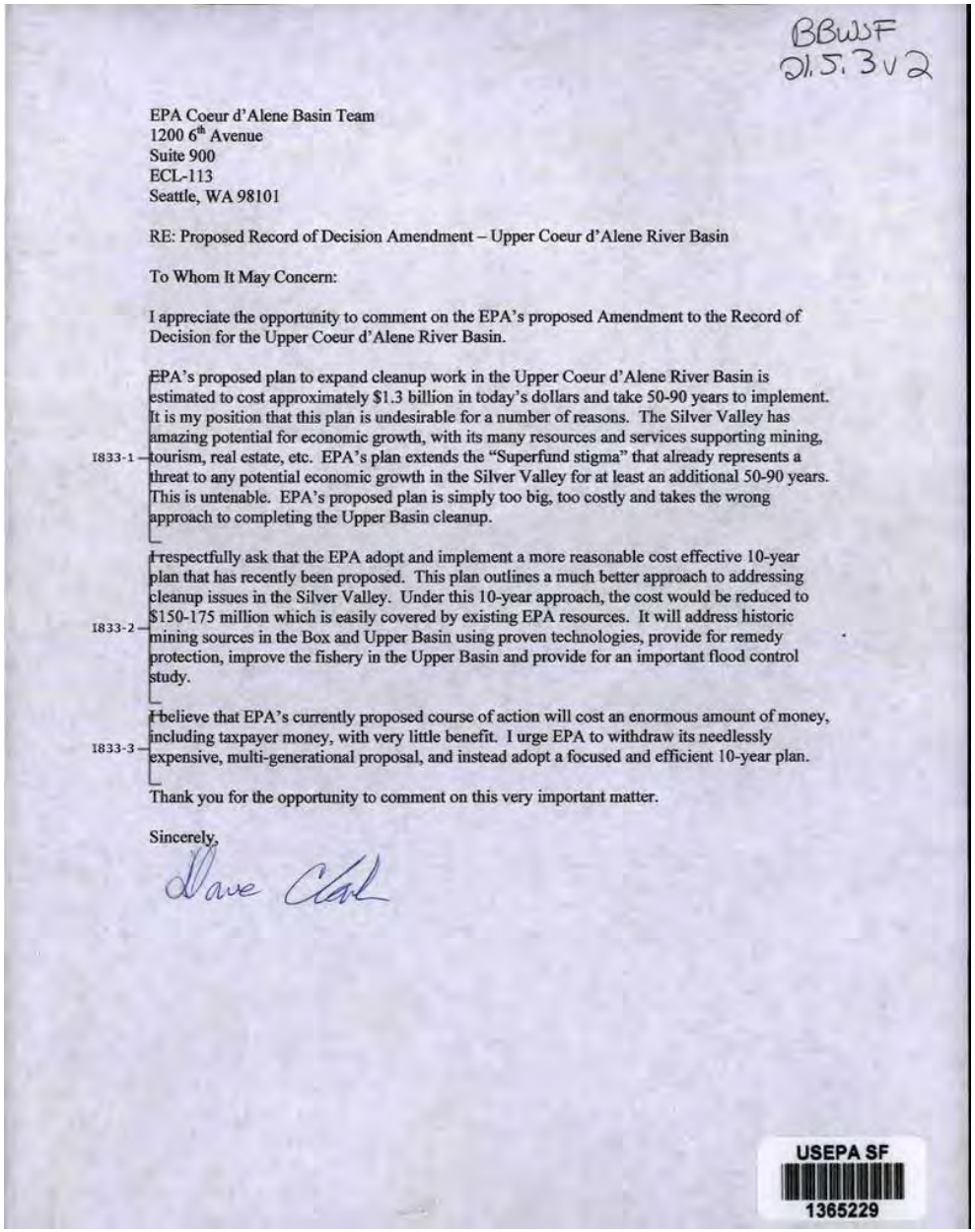
Response to comment I567-2

See response to Comment No. I295-2.

Response to comment I567-3

See response to Comment No. I295-3.

Clark, Dave, I833, Letter 1365229



BBWSF
21.5.3 v 2

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I833-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I833-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I833-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Dave Clark

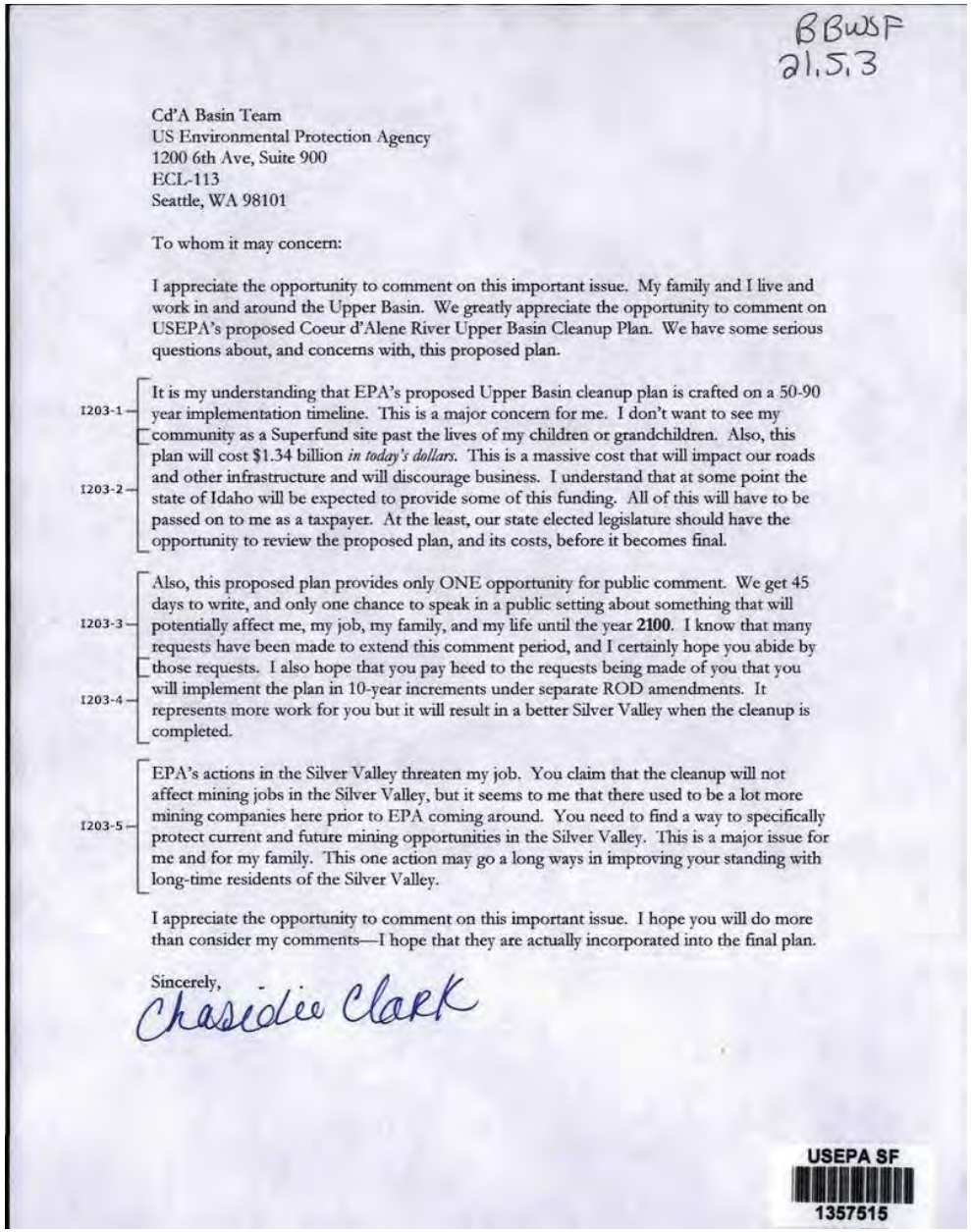
USEPA SF
1365229

Response to comment I833-1
See response to Comment No. I474-1.

Response to comment I833-2
See response to Comment No. I474-2.

Response to comment I833-3
See response to Comment No. I474-3.

Clark, Chasidie, I203, Letter 1357515



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I203-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I203-2

I203-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I203-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I203-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,
Chasidie Clark

USEPA SF
1357515

Response to comment I203-1
See response to Comment No. I58-1.

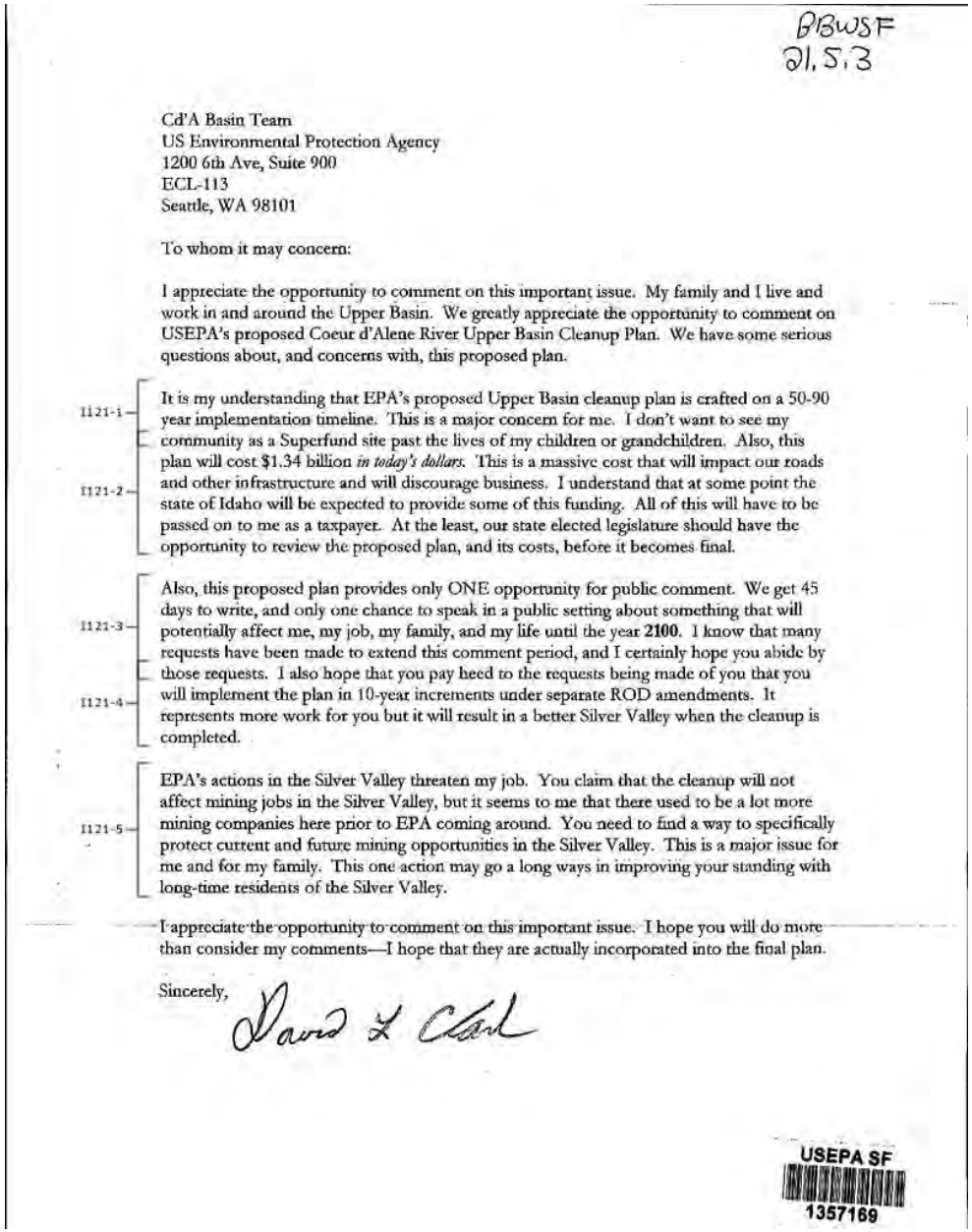
Response to comment I203-2
See response to Comment No. I58-2.

Response to comment I203-3
See response to Comment No. I58-3.

Response to comment I203-4
See response to Comment No. I58-4.

Response to comment I203-5
See response to Comment No. I58-5.

Clark, David, I121, Letter 1357169



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

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I121-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I121-2

I121-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

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I121-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

David L Clark

USEPA SF
1357169

Response to comment I121-1
See response to Comment No. I58-1.

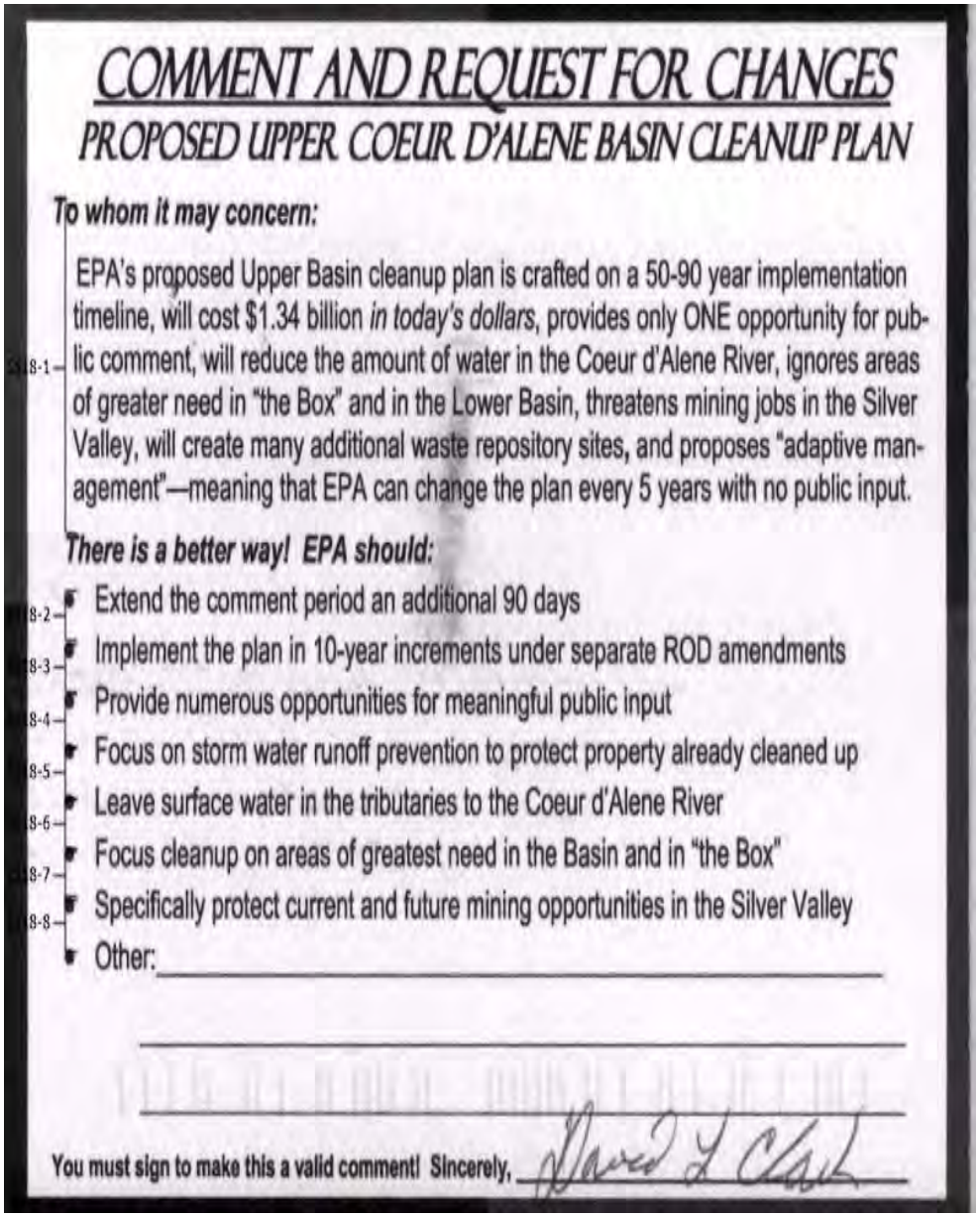
Response to comment I121-2
See response to Comment No. I58-2.

Response to comment I121-3
See response to Comment No. I58-3.

Response to comment I121-4
See response to Comment No. I58-4.

Response to comment I121-5
See response to Comment No. I58-5.

Clark, David, I518, Letter 1357640



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I518-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I518-2 Extend the comment period an additional 90 days
- I518-3 Implement the plan in 10-year increments under separate ROD amendments
- I518-4 Provide numerous opportunities for meaningful public input
- I518-5 Focus on storm water runoff prevention to protect property already cleaned up
- I518-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I518-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I518-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, David L Clark

Response to comment I518-1
See response to Comment No. I25-1.

Response to comment I518-2
See response to Comment No. I25-2.

Response to comment I518-3
See response to Comment No. I25-3.

Response to comment I518-4
See response to Comment No. I25-4.

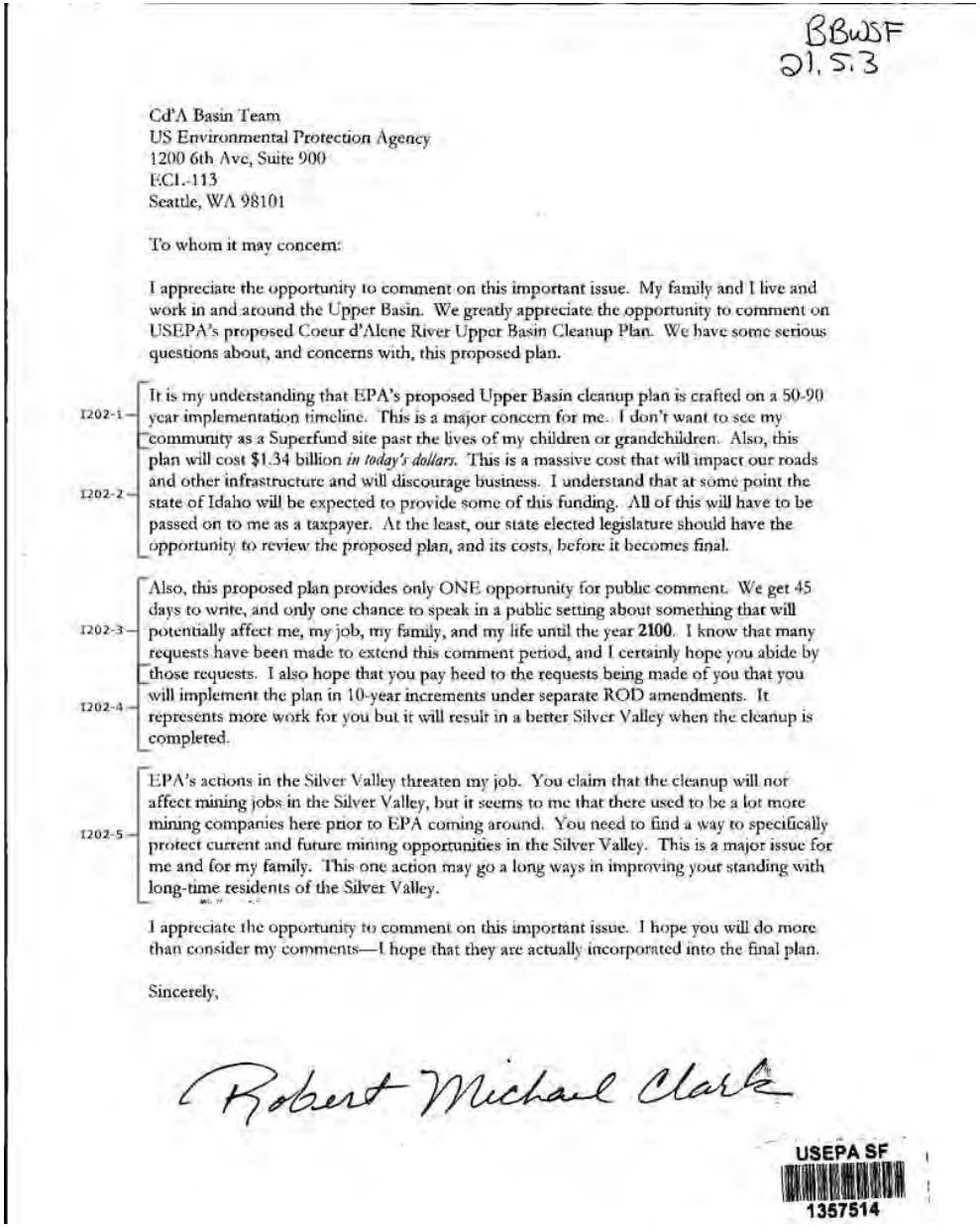
Response to comment I518-5
See response to Comment No. I25-5.

Response to comment I518-6
See response to Comment No. I25-6.

Response to comment I518-7
See response to Comment No. I25-7.

Response to comment I518-8
See response to Comment No. I25-8.

Clark, Robert M., I202, Letter 1357514



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

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I202-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I202-2

I202-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I202-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I202-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Robert Michael Clark

USEPA SF
1357514

Response to comment I202-1
See response to Comment No. I58-1.

Response to comment I202-2
See response to Comment No. I58-2.

Response to comment I202-3
See response to Comment No. I58-3.

Response to comment I202-4
See response to Comment No. I58-4.

Response to comment I202-5
See response to Comment No. I58-5.

Clary, Heidi, I568, Letter 617571

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
hmclary@msn.com to: formsubmission 11/19/2010 01:46 PM
Sent by: Hmclary@Msn.Com <hmclary=msn.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Heidi Clary
Date: 11/19/2010

I568-1 Brief Overview: The current proposed ROD for the Coeur d'Alene River Basin lacks sufficient flood control measures, covers too many years, and falls to assure the plan will not inhibit current and future mining.

My Concerns:

I568-2 Additional Comments: Thank you for the opportunity to comment on the proposed plan for the Upper Coeur d' Alene River Basin. I do not currently live in the Silver Valley, but I lived there for many years and currently have numerous family and friends in the area.

The EPA's proposed plan focuses too many dollars in areas which are not protective of human health. The plan should be revised to include more money for flood control, which will protect human health by protecting areas previously reclaimed.

I568-3 I also hope significant consideration will be give to the economic impact on the Silver Valley, when the EPA prepares the ROD. Many families depend on mining as the sole source, or a significant source, of their income. It is very important that current mining activities be allowed to continue, and new mining operations be allowed to develop. In order to sustain our economy, I568-4 mining activities conducted under the current legislative and regulatory system must be allowed to continue.

Thank you
Coeur d'Alene Basin Resident: No
Email Address: hmclary@msn.com
Mailing Address: 8106 e. Sommerset Dr.|Spokane|Washington|99217|US
Phone Number:

617571

Response to comment I568-1

See responses to Comment Nos. LJ36-3, I58-1, and I58-5.

Response to comment I568-2

See responses to Comment Nos. I295-1, I54-5 and LJ36-3.

Response to comment I568-3

See responses to Comment Nos. I58-5 and I54-2.

Response to comment I568-4

See response to Comment No. I58-5.

Clary, Michael, I364, Letter 616250

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mclary@hecla-mining.com to: formsubmission 11/11/2010 02:14 PM
Sent by: McLary@Hecla-Mining.Com <mclary=hecla-mining.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Michael Clary
Date: 11/11/2010

I364-1 Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons and leads to uncertainty of economic development in the upper Coeur d'Alene river basin - specifically mining.

My Concerns:

Additional Comments: My name is Mike Clary and I am currently an attorney at Hecla Mining Company. I have worked for Hecla for 16 years and appreciate the opportunity to comment on some of the issues of concern I have with the EPA's proposed plan for the Upper Coeur d'Alene River Basin.

I364-2 In recent months, EPA has claimed that its proposed massive work plan will create jobs and economic benefit for the communities of the Silver Valley. While creating jobs and economic development is a laudable goal, it is certainly not a role EPA is qualified to play, nor is it part of CERCLA's mandate.

I364-3 The Silver Valley economy depends on stable, family-wage jobs and the economic strength that comes from the contributions healthy businesses make in our communities. For instance, for the 5-year period from 2006 through 2010, Hecla will have spent approximately $400 million dollars to run its Lucky Friday mine located in Mullan, Idaho. A significant percentage of that $400 million has been spent in the Silver Valley including expenditures for payroll, exploration, development, and purchases of goods and services from local vendors for on-going operations.

I364-4 Hecla employs 267 full-time men and women at the Lucky Friday mine and, in addition, pays over 100 contractors to provide additional services (such as welders, construction crews, engineers). This is real employment and economic development, as opposed to the seasonal jobs typically provided by EPA's past work in the Silver Valley.

I spent my first ten years at Hecla serving as personnel manager at the Lucky Friday mine, and during that time I recall countless occasions when people who had been working for EPA related contractors in the Silver Valley came into my office looking for full-time, non-seasonal, family-wage jobs that included benefits.

I364-5 The average job at the Lucky Friday has been valued at approximately $100,000 dollars per year during the past two years. That number consists of $70,000

616250

Response to comment I364-1

See responses to Comment Nos. I474-1 and I58-5.

Response to comment I364-2

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. EPA has simply stated that the benefits of cleanup actions include benefits to the local economy.

Response to comment I364-3

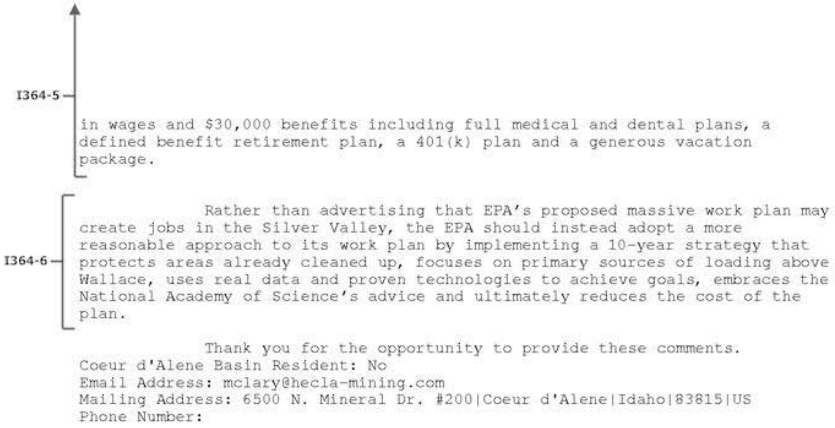
See response to Comment No. I58-5.

Response to comment I364-4

See response to Comment No. LC32-2.

Response to comment I364-5

Comment noted.



I364-5

in wages and $30,000 benefits including full medical and dental plans, a defined benefit retirement plan, a 401(k) plan and a generous vacation package.

I364-6

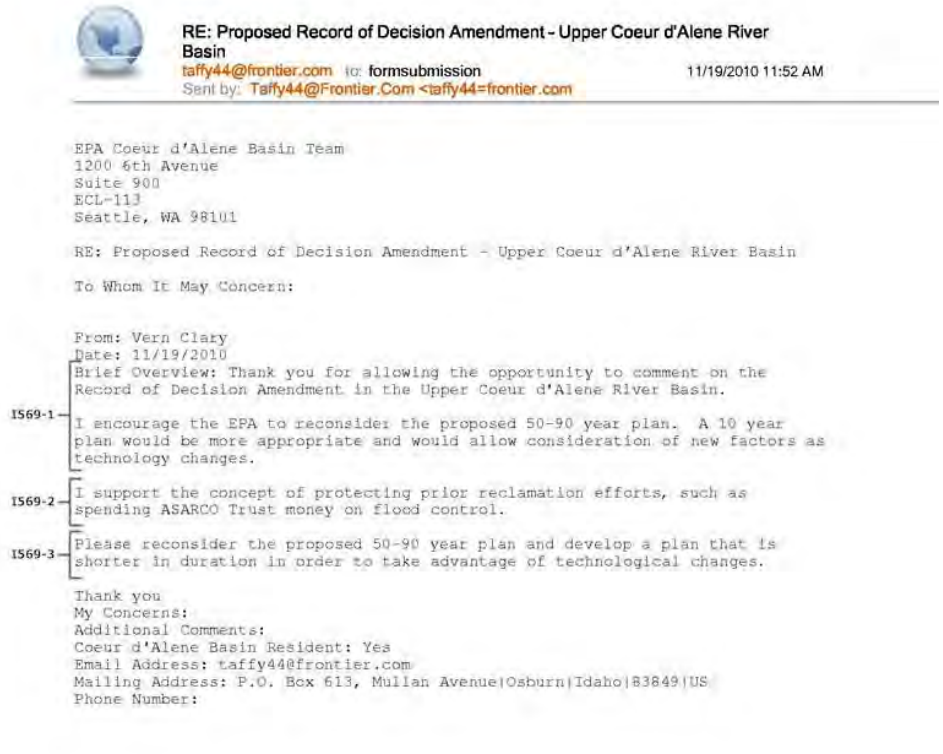
Rather than advertising that EPA's proposed massive work plan may create jobs in the Silver Valley, the EPA should instead adopt a more reasonable approach to its work plan by implementing a 10-year strategy that protects areas already cleaned up, focuses on primary sources of loading above Wallace, uses real data and proven technologies to achieve goals, embraces the National Academy of Science's advice and ultimately reduces the cost of the plan.

Thank you for the opportunity to provide these comments.
Coeur d'Alene Basin Resident: No
Email Address: mclary@hecla-mining.com
Mailing Address: 6500 N. Mineral Dr. #200|Coeur d'Alene|Idaho|83815|US
Phone Number:

Response to comment I364-6

See responses to Comment Nos. I474-2, LJ27-8, and I59-2.

Clary, Vern, I569, Letter 617572



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
taffy44@frontier.com to: formsubmission 11/19/2010 11:52 AM
Sent by: Taffy44@Frontier.Com <taffy44=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Vern Clary
Date: 11/19/2010
Brief Overview: Thank you for allowing the opportunity to comment on the Record of Decision Amendment in the Upper Coeur d'Alene River Basin.

I569-1 I encourage the EPA to reconsider the proposed 50-90 year plan. A 10 year plan would be more appropriate and would allow consideration of new factors as technology changes.

I569-2 I support the concept of protecting prior reclamation efforts, such as spending ASARCO Trust money on flood control.

I569-3 Please reconsider the proposed 50-90 year plan and develop a plan that is shorter in duration in order to take advantage of technological changes.

Thank you
My Concerns:
Additional Comments:
Coeur d'Alene Basin Resident: Yes
Email Address: taffy44@frontier.com
Mailing Address: P.O. Box 613, Mullan Avenue|Osburn|Idaho|83849|US
Phone Number:

617572

Response to comment I569-1

See response to Comment No. I58-1.

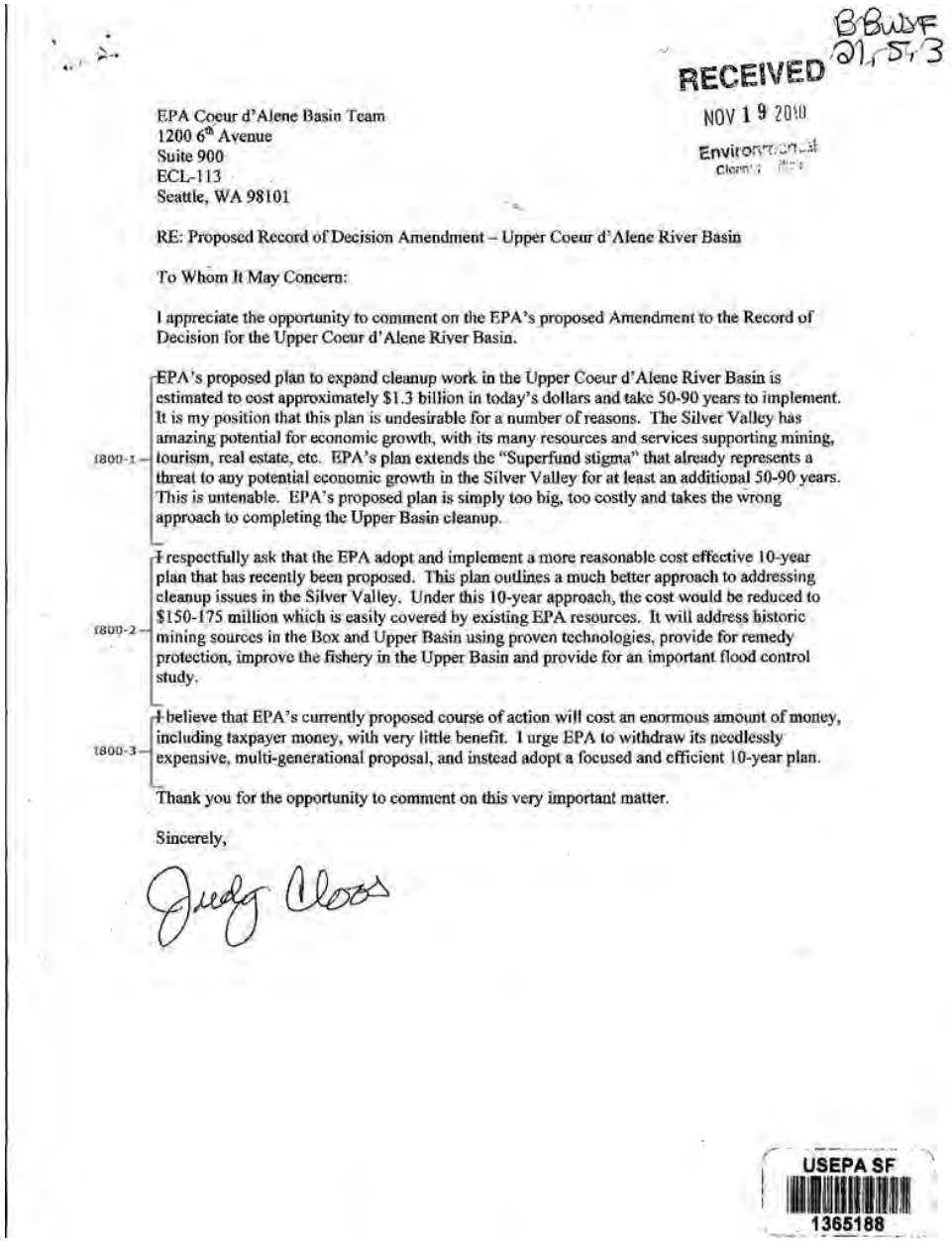
Response to comment I569-2

See responses to Comment Nos. I295-3 and LJ36-3.

Response to comment I569-3

See response to Comment No. I58-1.

Cloos, Judy, I800, Letter 1365188



B BWSF 21,57,3

RECEIVED
NOV 19 2010
Environmental Clean

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I800-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I800-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I800-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Judy Cloos

USEPA SF
1365188

Response to comment I800-1
See response to Comment No. I474-1.

Response to comment I800-2
See response to Comment No. I474-2.

Response to comment I800-3
See response to Comment No. I474-3.

Cloos, Ken, I365, Letter 616252

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
kencloos@hotmail.com to: formsubmission 11/15/2010 01:29 PM
Sent by: Kencloos@Hotmail.Com <kencloos=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Ken Cloos
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: kencloos@hotmail.com
Mailing Address:
Phone Number:

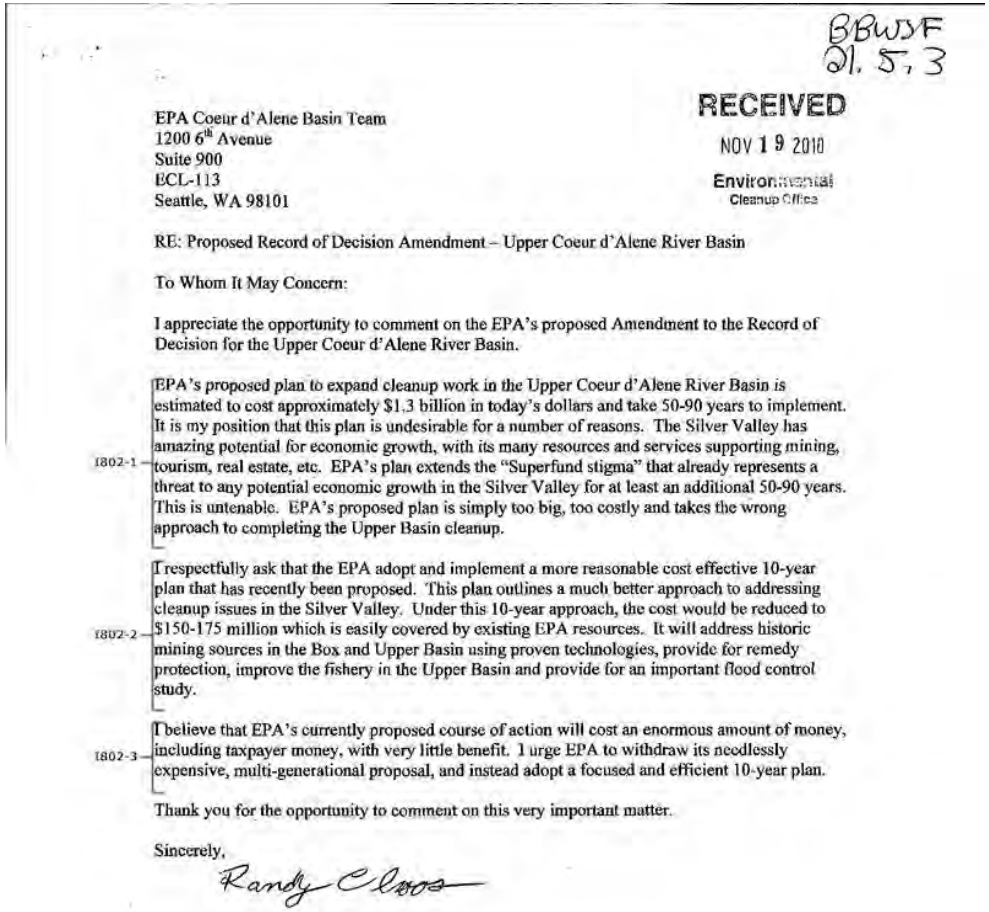
I365-1

616252

Response to comment I365-1

See response to Comment No. I351-1.

Cloos, Randy, I802, Letter 1365190



BBWSF
21.5.3

RECEIVED
NOV 19 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I802-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I802-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I802-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Randy Cloos

USEPA SF
1365190

Response to comment I802-1

See response to Comment No. I474-1.

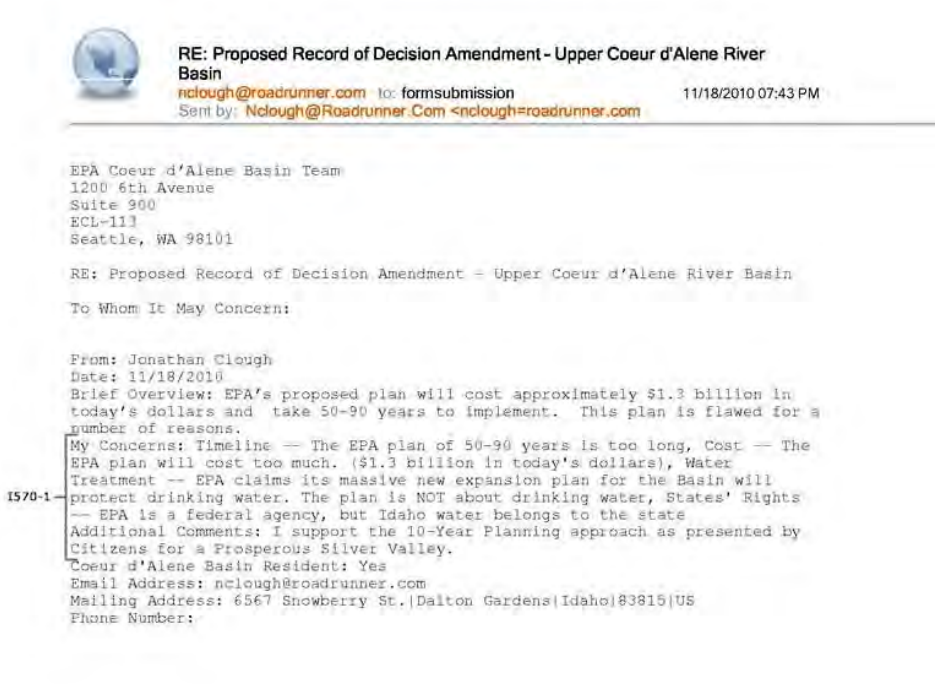
Response to comment I802-2

See response to Comment No. I474-2.

Response to comment I802-3

See response to Comment No. I474-3.

Clough, Jonathan, I570, Letter 617573



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

nclough@roadrunner.com to: formsubmission 11/18/2010 07:43 PM

Sent by: Nclough@Roadrunner.Com <nclough=roadrunner.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-111
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Jonathan Clough
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I570-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: nclough@roadrunner.com
Mailing Address: 6567 Snowberry St.|Dalton Gardens|Idaho|83815|US
Phone Number:

617573

Response to comment I570-1

See response to Comment No. I351-1.

Clough, Sharon, I366, Letter 616253

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
sharonclough@wseco.com to: formsubmission 11/09/2010 07:19 AM
Sent by: Sharonclough@Wseco.Com <sharonclough=wseco.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Sharon Clough
Date: 11/09/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I366-1 The timeline involved of the 50 to 90 years is too long an it's at a price that EPA and the citizens of the Silver Valley cannot afford. In addition this plan has not been reviewed or approved by the Idaho Legislature and as it is proposed would have a negative impact on the development in the Silver Valley.

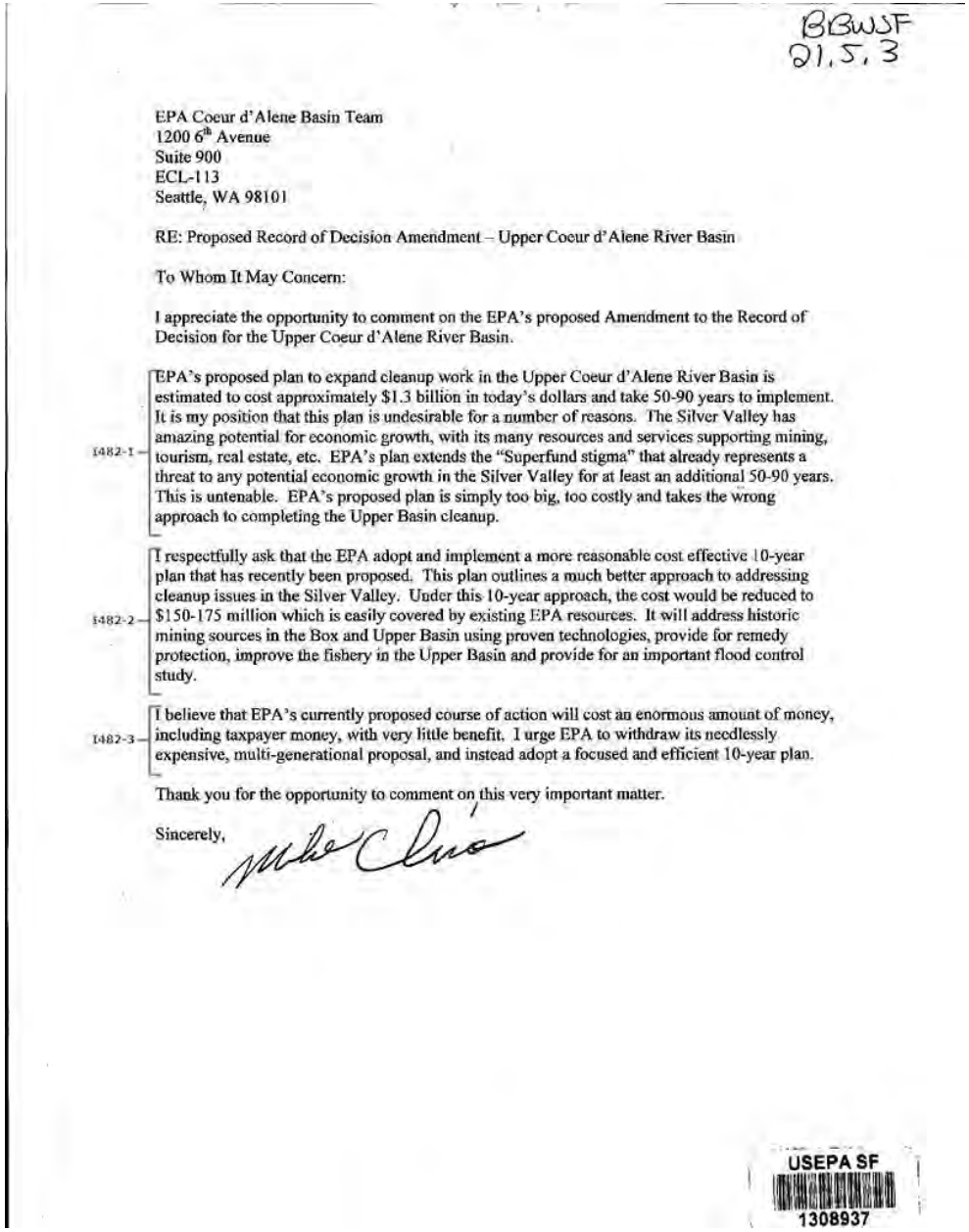
For these reasons, I strongly opposed the EPA's proposal.
My Concerns:
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: sharonclough@wseco.com
Mailing Address: Sharon Clough, 6017 S. Latigo Drive|Boise|ID|83709|US
Phone Number:

616253

Response to comment I366-1

See responses to Comment Nos. I58-1, I58-2 and LJ39-5.

Clus, Mike, I482, Letter 1308937



BBWJF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I482-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I482-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I482-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Mike Clus

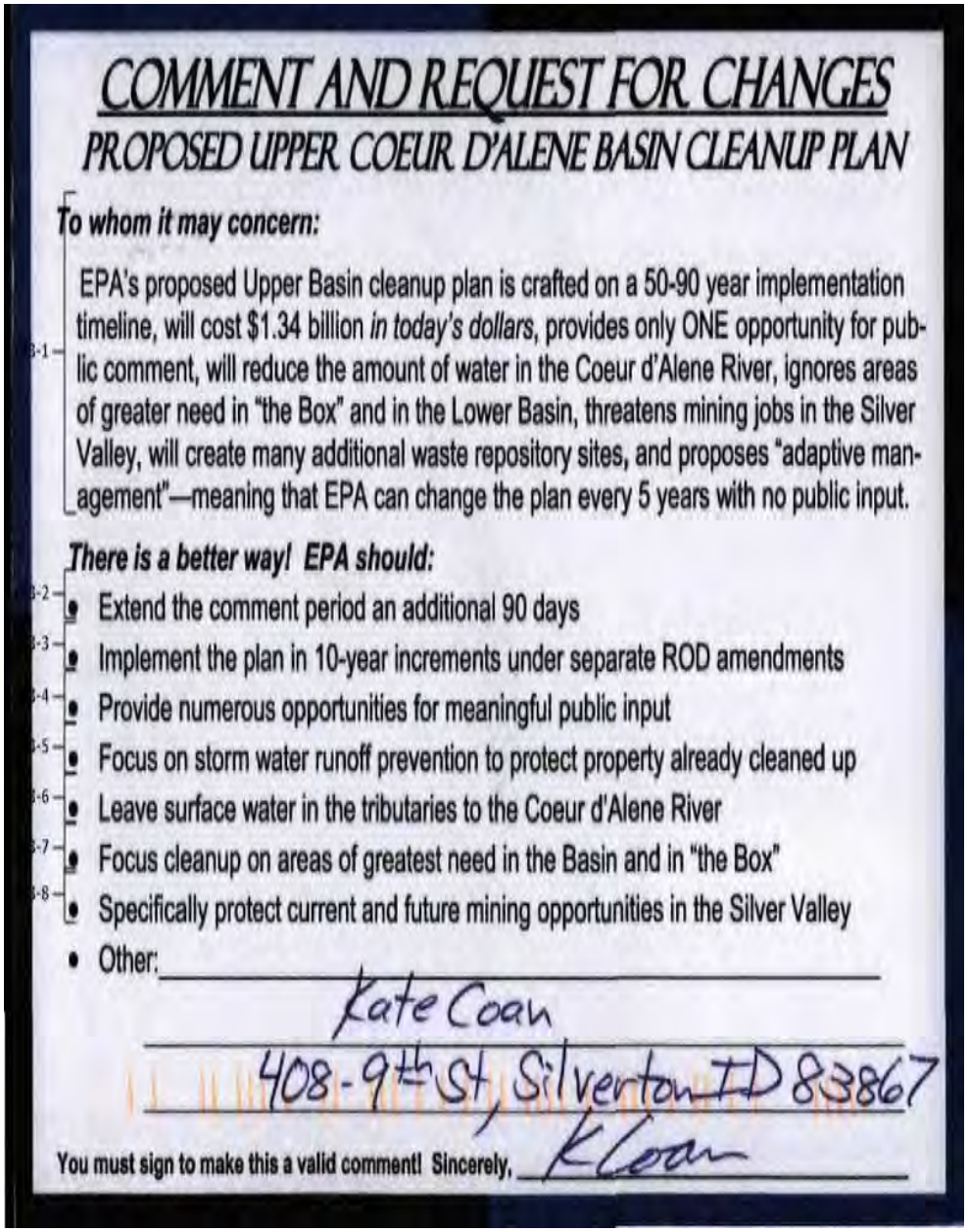
USEPA SF
1308937

Response to comment I482-1
See response to Comment No. I474-1.

Response to comment I482-2
See response to Comment No. I474-2.

Response to comment I482-3
See response to Comment No. I474-3.

Coan, K., I33, Letter 1357077



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I33-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I33-2 Extend the comment period an additional 90 days
- I33-3 Implement the plan in 10-year increments under separate ROD amendments
- I33-4 Provide numerous opportunities for meaningful public input
- I33-5 Focus on storm water runoff prevention to protect property already cleaned up
- I33-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I33-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I33-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

Kate Coan

408-9th St, Silverton ID 83867

You must sign to make this a valid comment! Sincerely, K Coan

Response to comment I33-1
See response to Comment No. I25-1.

Response to comment I33-2
See response to Comment No. I25-2.

Response to comment I33-3
See response to Comment No. I25-3.

Response to comment I33-4
See response to Comment No. I25-4.

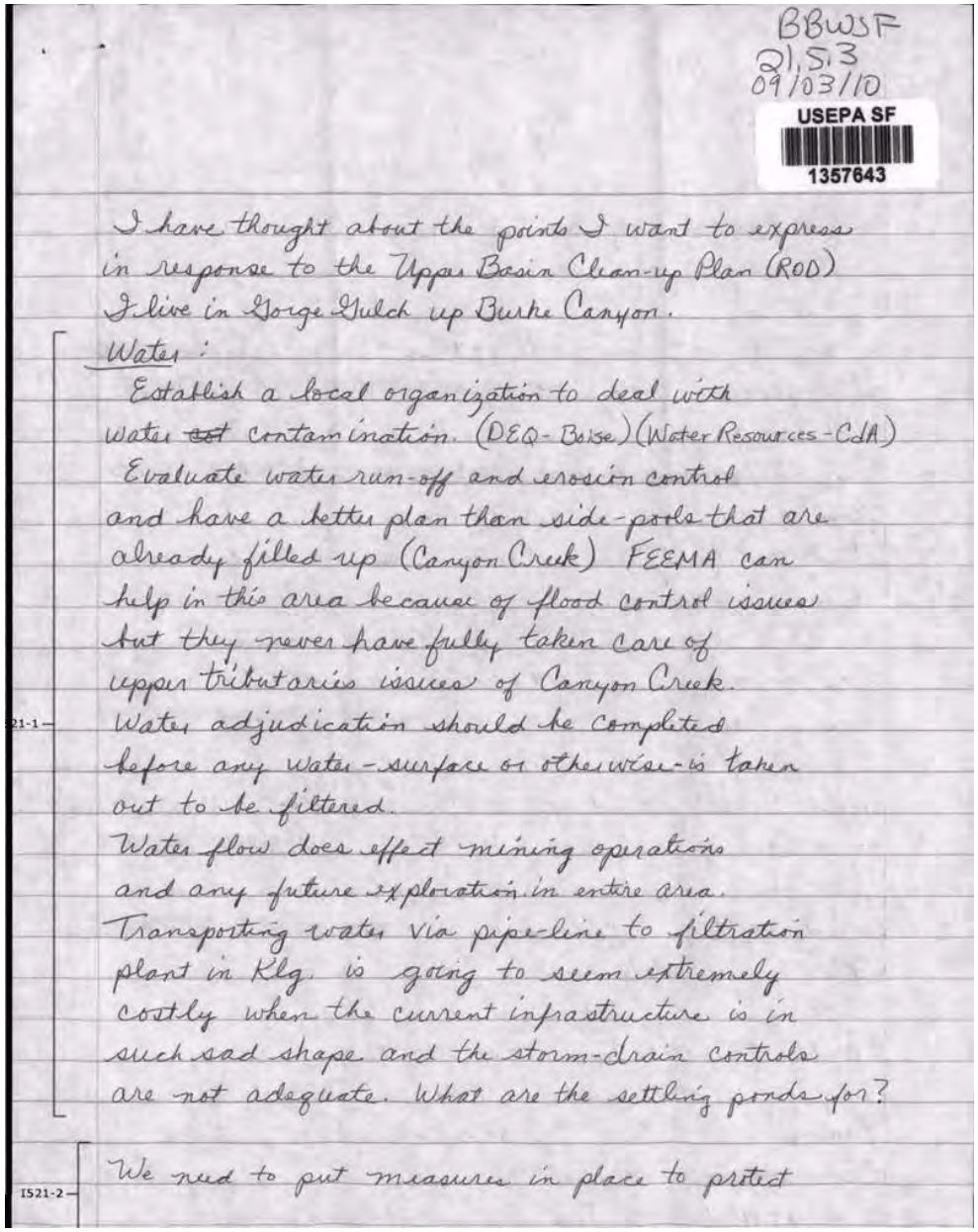
Response to comment I33-5
See response to Comment No. I25-5.

Response to comment I33-6
See response to Comment No. I25-6.

Response to comment I33-7
See response to Comment No. I25-7.

Response to comment I33-8
See response to Comment No. I25-8.

Collins, Carolyn, I521, Letter 1357643



BBWSF
21.5.3
09/03/10

USEPA SF
1357643

I have thought about the points I want to express in response to the Upper Basin Clean-up Plan (ROD) I live in Gorge Gulch up Burke Canyon.

Water:

Establish a local organization to deal with water ~~not~~ contamination. (DEQ - Boise) (Water Resources - CdA)

Evaluate water run-off and erosion control and have a better plan than side-pools that are already filled up (Canyon Creek) FEEMA can help in this area because of flood control issues but they never have fully taken care of upper tributaries issues of Canyon Creek.

I521-1 Water adjudication should be completed before any water - surface or otherwise - is taken out to be filtered.

Water flow does effect mining operations and any future exploration in entire area.

Transporting water via pipe-line to filtration plant in Klg. is going to seem extremely costly when the current infrastructure is in such sad shape and the storm-drain controls are not adequate. What are the settling ponds for?

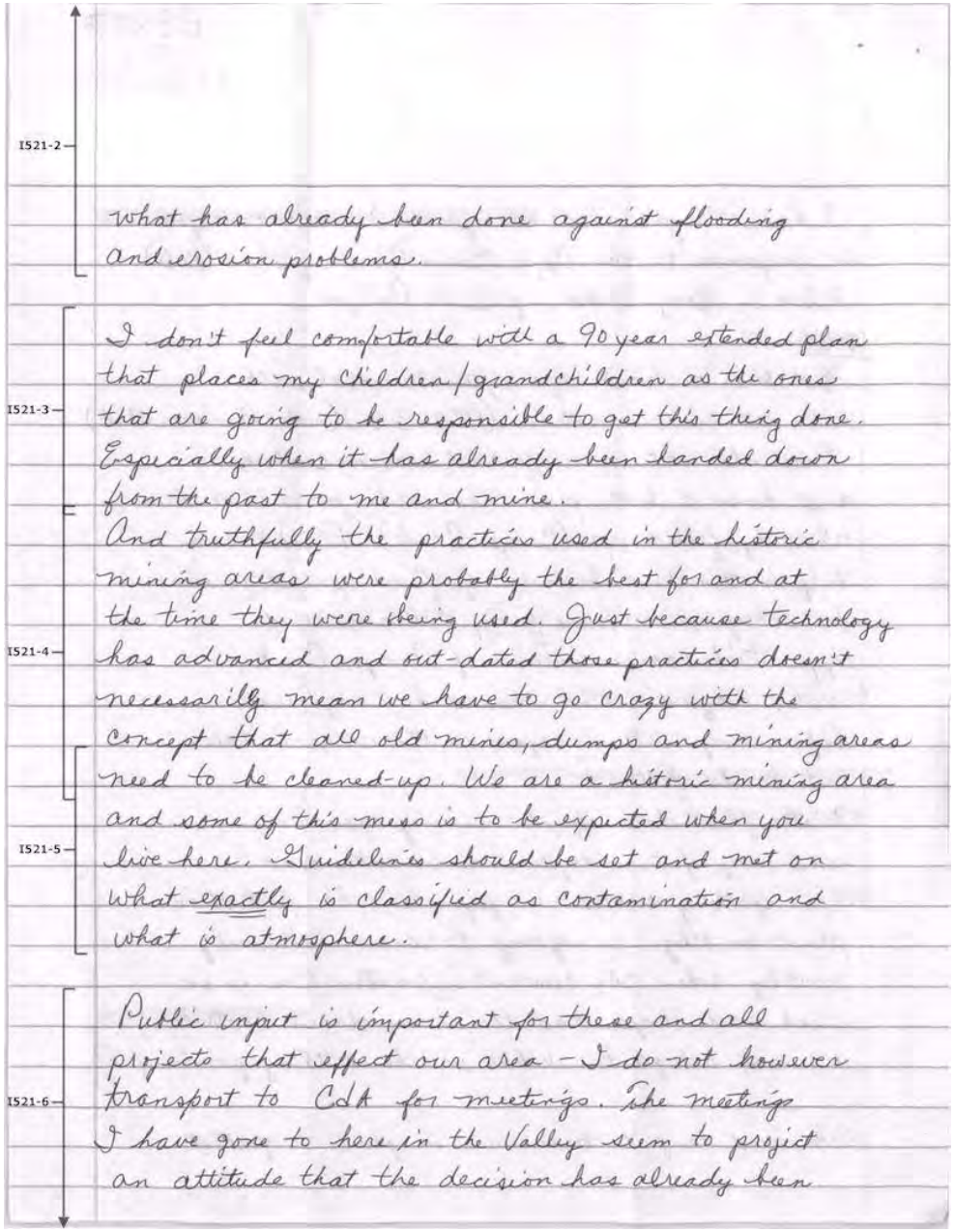
I521-2 We need to put measures in place to protect

Response to comment I521-1

EPA will continue to work with IDEQ, the Basin Commission, and other project stakeholders in addressing water contamination in the Upper Basin. There are no plans to create an additional organization to address water contamination issues. Where water runoff and erosion have the potential to impact the effectiveness of the Selected Remedy, these issues will be considered and mitigation measures incorporated into remedial designs. The water adjudication process in the State of Idaho is ongoing. EPA will coordinate with the State of Idaho on all water collection actions as they are implemented and will comply with all applicable or relevant and appropriate requirements (ARARs). The flow rate of contaminated water to be collected from the Upper Basin for treatment at the Central Treatment Plan (CTP) is relatively low in comparison to overall surface water flows and is not expected to impact existing water rights holders, including mining companies. The intent of the comment regarding settling ponds is unclear. If this refers to the onsite water treatment, there will be lime settling ponds used in some areas to treat contaminated water onsite rather than conveying it to the CTP for treatment. Onsite treatment is generally less costly than treatment at the CTP for sites in relatively remote locations.

Response to comment I521-2

See responses to Comment Nos. I54-5 and LJ36-3.



I521-2

What has already been done against flooding and erosion problems.

I521-3

I don't feel comfortable with a 90 year extended plan that places my children / grandchildren as the ones that are going to be responsible to get this thing done. Especially when it has already been handed down from the past to me and mine.

I521-4

And truthfully the practices used in the historic mining areas were probably the best for and at the time they were being used. Just because technology has advanced and out-dated those practices doesn't necessarily mean we have to go crazy with the concept that all old mines, dumps and mining areas need to be cleaned-up. We are a historic mining area and some of this mess is to be expected when you live here.

I521-5

Guidelines should be set and met on what exactly is classified as contamination and what is atmosphere.

I521-6

Public input is important for these and all projects that effect our area – I do not however transport to CdA for meetings. The meetings I have gone to here in the Valley seem to project an attitude that the decision has already been

Response to comment I521-3

See response to Comment No. I58-1.

Response to comment I521-4

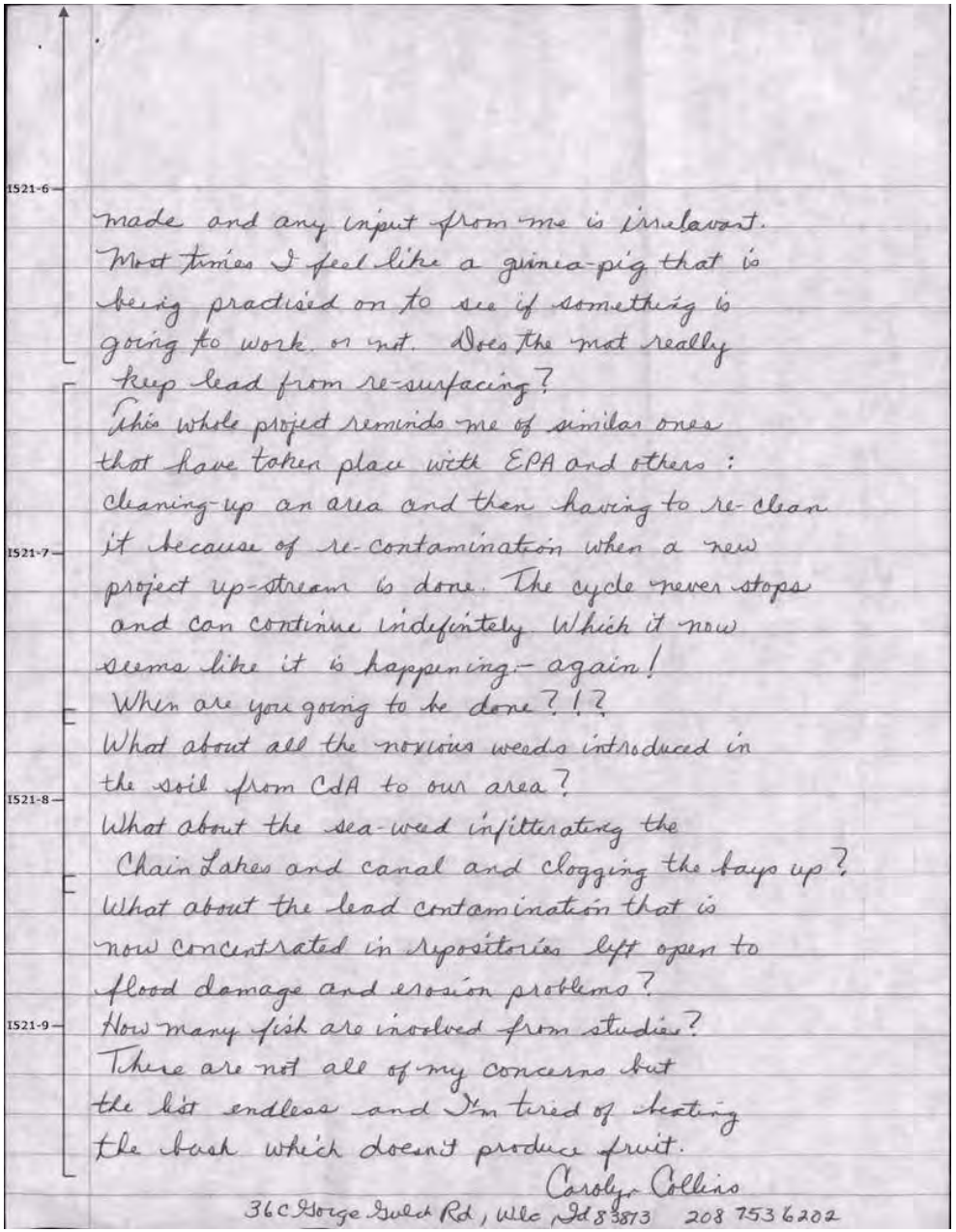
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to addressing these unacceptable risks.

Response to comment I521-5

See response to Comment No. LC33-8.

Response to comment I521-6

See response to Comment No. I295-2.



I521-6

made and any input from me is irrelavant.
Most times I feel like a guinea-pig that is
being practised on to see if something is
going to work or not. Does the mat really
keep lead from re-surfacing?
This whole project reminds me of similar ones
that have taken place with EPA and others:
cleaning up an area and then having to re-clean
I521-7 it because of re-contamination when a new
project up-stream is done. The cycle never stops
and can continue indefintely. Which it now
seems like it is happening - again!
When are you going to be done?!?
What about all the noxious weeds introduced in
the soil from CdA to our area?
I521-8 What about the sea-weed infiltrating the
Chain Lakes and canal and clogging the bays up?
What about the lead contamination that is
now concentrated in repositories left open to
flood damage and erosion problems?
I521-9 How many fish are involved from studies?
There are not all of my concerns but
the list endless and I'm tired of beating
the bush which doesn't produce fruit.

Carolyn Collins
36C Gorge Gulch Rd, Wlc Id 83873 208 753 6202

Response to comment I521-7

See response to Comment No. I58-1. EPA has already begun the process of prioritizing sites for cleanup in the Upper Basin, and potential for recontamination is taken into account.

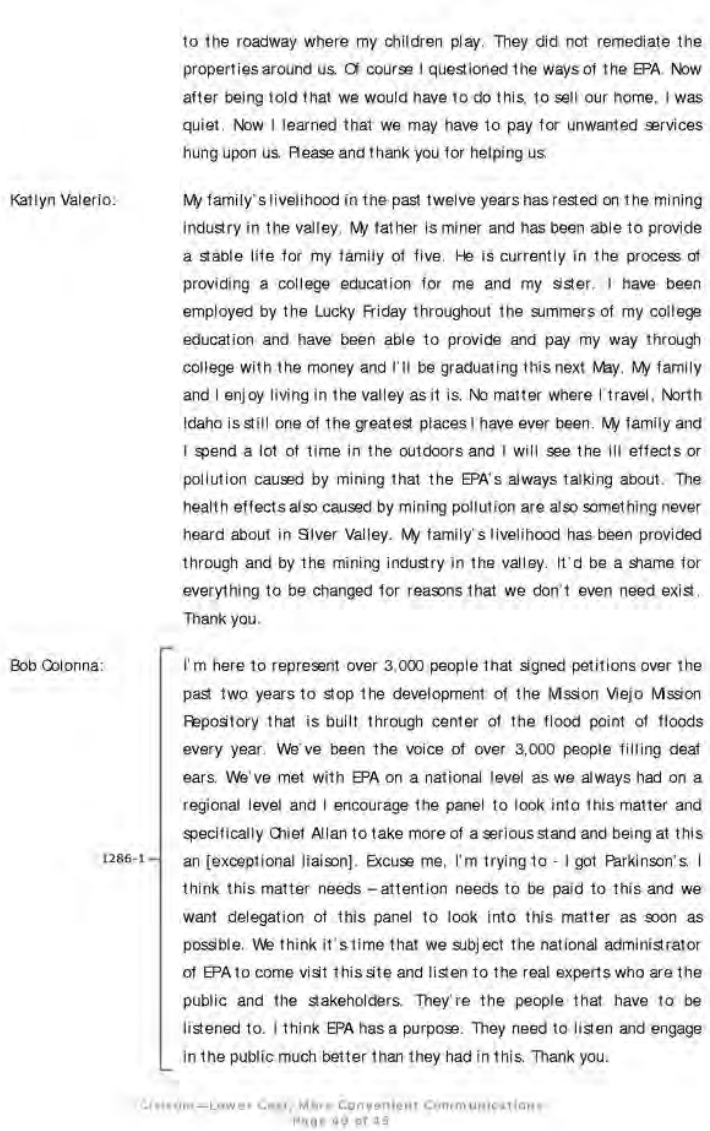
Response to comment I521-8

The yard cleanup remedy was selected as part of the human health component in EPA's 2002 ROD for OU 3 (EPA, 2002; www.epa.gov/superfund/sites/rods/fulltext/r1002032.pdf). The current ROD Amendment for the Upper Basin does not include any changes to the human health remedy selected in the 2002 ROD, and focuses on cleanup actions to improve surface water and groundwater quality and to reduce contamination in soils and sediments where actions are taken. IDEQ administers the Basin Property Remediation Program (BPRP), also referred to as the yards program. The BPRP implements yard cleanups, which include the removal of contaminated soil in places where humans are frequently exposed, such as yards, parks, and public properties to address the human health component of the cleanup.

Response to comment I521-9

Repositories that are part of the Selected Remedy will be designed to mitigate potential flooding and erosion impacts. As documented in the ROD Amendment, numerous studies have been conducted regarding water quality. These studies have repeatedly documented concentrations of dissolved zinc and cadmium that are above safe levels for fish. The Selected Remedy will result in significant reductions in these metals concentrations.

Colonna, Bob, I286, Letter 616015-51



to the roadway where my children play. They did not remediate the properties around us. Of course I questioned the ways of the EPA. Now after being told that we would have to do this, to sell our home, I was quiet. Now I learned that we may have to pay for unwanted services hung upon us. Please and thank you for helping us.

Katlyn Valerio: My family's livelihood in the past twelve years has rested on the mining industry in the valley. My father is miner and has been able to provide a stable life for my family of five. He is currently in the process of providing a college education for me and my sister. I have been employed by the Lucky Friday throughout the summers of my college education and have been able to provide and pay my way through college with the money and I'll be graduating this next May. My family and I enjoy living in the valley as it is. No matter where I travel, North Idaho is still one of the greatest places I have ever been. My family and I spend a lot of time in the outdoors and I will see the ill effects or pollution caused by mining that the EPA's always talking about. The health effects also caused by mining pollution are also something never heard about in Silver Valley. My family's livelihood has been provided through and by the mining industry in the valley. It'd be a shame for everything to be changed for reasons that we don't even need exist. Thank you.

Bob Colonna: I'm here to represent over 3,000 people that signed petitions over the past two years to stop the development of the Mission Viejo Mission Repository that is built through center of the flood point of floods every year. We've been the voice of over 3,000 people filling deaf ears. We've met with EPA on a national level as we always had on a regional level and I encourage the panel to look into this matter and specifically Chief Allan to take more of a serious stand and being at this an [exceptional liaison]. Excuse me, I'm trying to - I got Parkinson's. I think this matter needs – attention needs to be paid to this and we want delegation of this panel to look into this matter as soon as possible. We think it's time that we subject the national administrator of EPA to come visit this site and listen to the real experts who are the public and the stakeholders. They're the people that have to be listened to. I think EPA has a purpose. They need to listen and engage in the public much better than they had in this. Thank you.

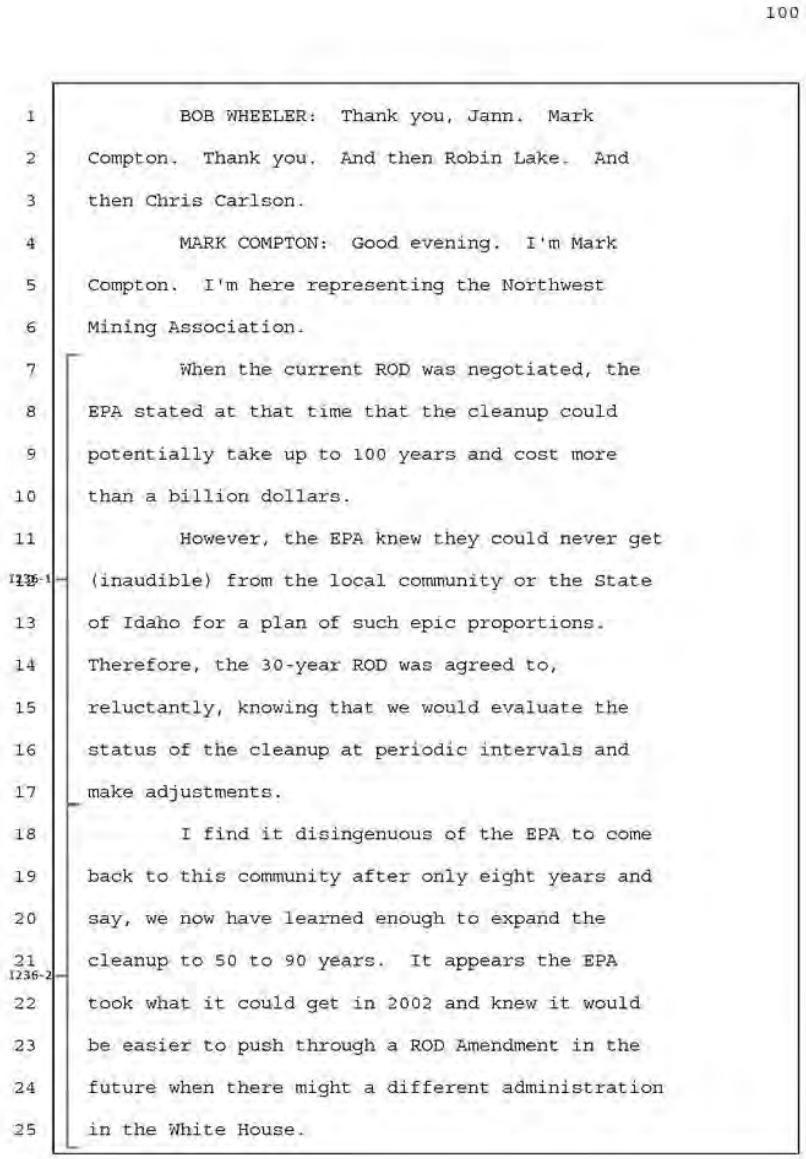
I286-1

Litescribe—Lower Cost, More Convenient Communications
Page 49 of 49

Response to comment I286-1

See responses to Comment Nos. I295-2 and LC21-9.

Compton, Mark, I236, Letter 610097-31



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BOB WHEELER: Thank you, Jann. Mark Compton. Thank you. And then Robin Lake. And then Chris Carlson.

MARK COMPTON: Good evening. I'm Mark Compton. I'm here representing the Northwest Mining Association.

When the current ROD was negotiated, the EPA stated at that time that the cleanup could potentially take up to 100 years and cost more than a billion dollars.

However, the EPA knew they could never get (inaudible) from the local community or the State of Idaho for a plan of such epic proportions. Therefore, the 30-year ROD was agreed to, reluctantly, knowing that we would evaluate the status of the cleanup at periodic intervals and make adjustments.

I find it disingenuous of the EPA to come back to this community after only eight years and say, we now have learned enough to expand the cleanup to 50 to 90 years. It appears the EPA took what it could get in 2002 and knew it would be easier to push through a ROD Amendment in the future when there might a different administration in the White House.

I236-1

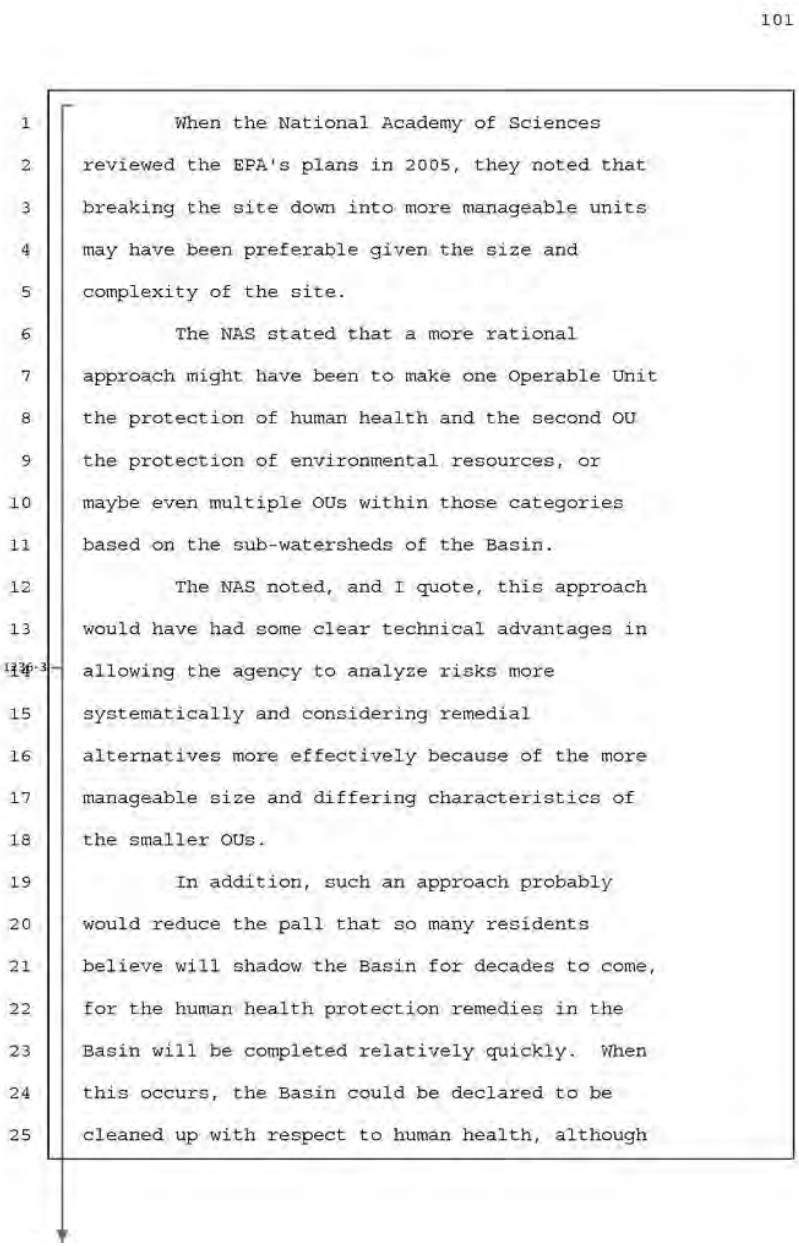
I236-2

Response to comment I236-1

Thank you for your comment. See response to Comment No. I58-1.

Response to comment I236-2

See response to Comment No. I58-1.



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When the National Academy of Sciences reviewed the EPA's plans in 2005, they noted that breaking the site down into more manageable units may have been preferable given the size and complexity of the site.

The NAS stated that a more rational approach might have been to make one Operable Unit the protection of human health and the second OU the protection of environmental resources, or maybe even multiple OUs within those categories based on the sub-watersheds of the Basin.

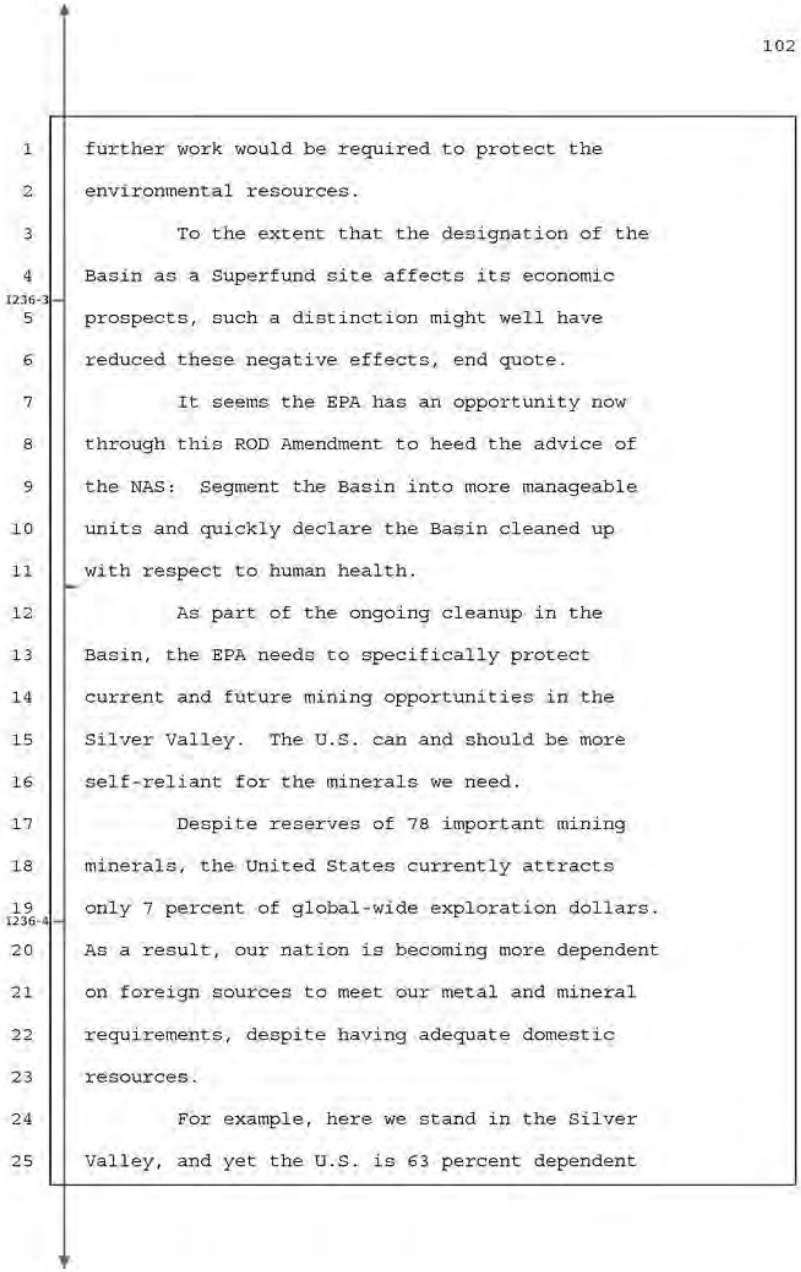
The NAS noted, and I quote, this approach would have had some clear technical advantages in allowing the agency to analyze risks more systematically and considering remedial alternatives more effectively because of the more manageable size and differing characteristics of the smaller OUs.

I236-3

In addition, such an approach probably would reduce the pall that so many residents believe will shadow the Basin for decades to come, for the human health protection remedies in the Basin will be completed relatively quickly. When this occurs, the Basin could be declared to be cleaned up with respect to human health, although

Response to comment I236-3

EPA's decision to issue a selected remedy that addresses the Box and Upper Basin is consistent with the NAS recommendations related to remediation objectives and approaches which favored a upstream to downstream sequencing of cleanup. In 2002, Congress instructed EPA to ask the National Research Council (NRC) to conduct an independent evaluation of the Bunker Hill Superfund Site. The NRC established the Committee on Superfund Site Assessment and Remediation in the Coeur d'Alene Basin to evaluate the 2002 Interim ROD and supporting documents and examine EPA's scientific and technical practices at the Site. The NAS issued the resulting report in 2005. The report's conclusions and recommendations cover remedial investigation, human health risk assessment, ecological risk assessment, and remediation objectives and approaches. Many of the recommendations relate to EPA's approach to the protection of the environment presented in the 2002 Interim ROD and the 2001 Feasibility Study Report. The NAS Review validated much of the 2002 Interim ROD, and the recommendations for areas of improvement primarily focused on ecological protection. EPA carefully considered the NAS report and its recommendations. Since the Interim ROD for OU 3 was issued in 2002 and the NAS Report in 2005, EPA has continued to collect environmental data and conduct studies throughout the Coeur d'Alene Basin, particularly in the Upper Basin. The additional data and studies improve EPA's understanding of the Upper Basin, and address key NAS recommendations. These are: the fate and transport of dissolved metals in the subsurface; the role that groundwater plays in contaminant loading to surface water; consideration of groundwater treatment approaches; the development of predictive tools to assess the effectiveness of remedial actions; evaluation of the SFCDR watershed as a whole, including the Bunker Hill Box; and improving the use of the adaptive management approach. The results of these efforts are reflected in the actions identified in this ROD Amendment. EPA believes the Selected Remedy presented in the ROD Amendment addresses the NAS report's recommendations, while recognizing EPA's statutory obligations under CERCLA.



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further work would be required to protect the environmental resources.

To the extent that the designation of the Basin as a Superfund site affects its economic prospects, such a distinction might well have reduced these negative effects, end quote.

I236-3

It seems the EPA has an opportunity now through this ROD Amendment to heed the advice of the NAS: Segment the Basin into more manageable units and quickly declare the Basin cleaned up with respect to human health.

As part of the ongoing cleanup in the Basin, the EPA needs to specifically protect current and future mining opportunities in the Silver Valley. The U.S. can and should be more self-reliant for the minerals we need.

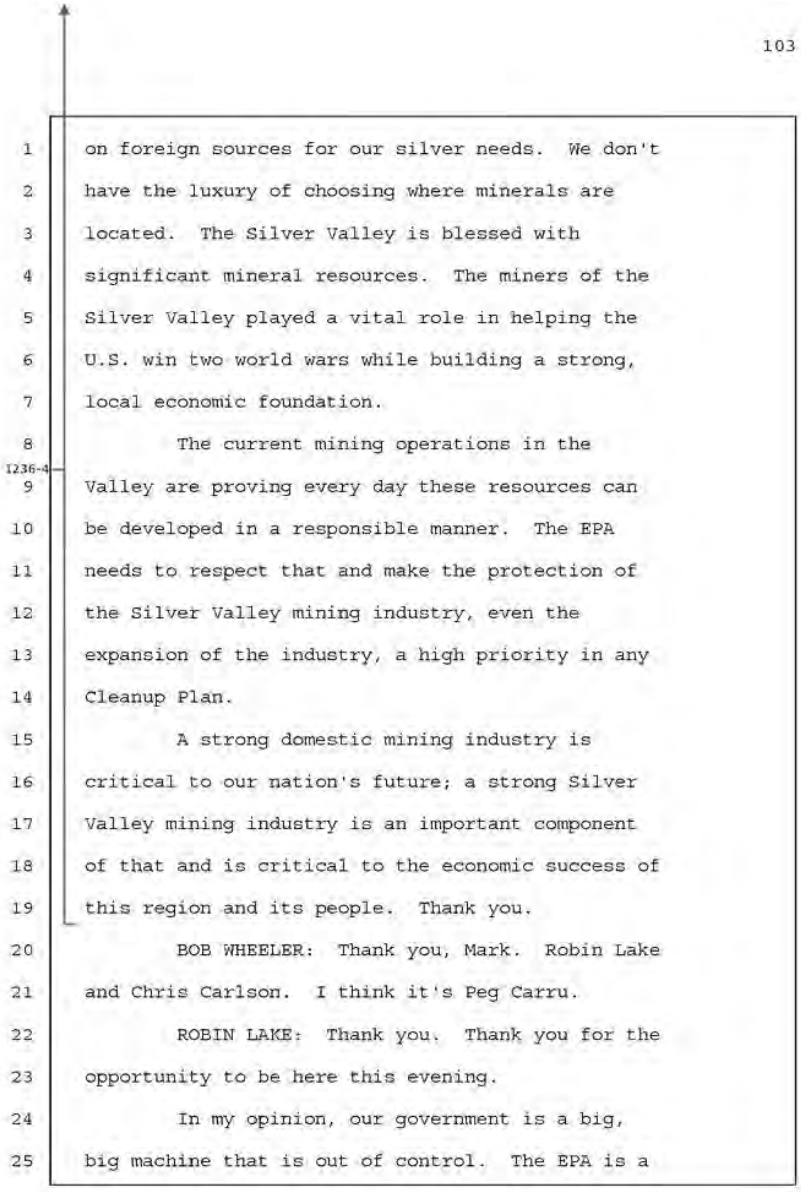
Despite reserves of 78 important mining minerals, the United States currently attracts only 7 percent of global-wide exploration dollars. As a result, our nation is becoming more dependent on foreign sources to meet our metal and mineral requirements, despite having adequate domestic resources.

I236-4

For example, here we stand in the Silver Valley, and yet the U.S. is 63 percent dependent

Response to comment I236-4

See response to Comment No. I58-5.



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on foreign sources for our silver needs. We don't have the luxury of choosing where minerals are located. The Silver Valley is blessed with significant mineral resources. The miners of the Silver Valley played a vital role in helping the U.S. win two world wars while building a strong, local economic foundation.

The current mining operations in the 1236-4 Valley are proving every day these resources can be developed in a responsible manner. The EPA needs to respect that and make the protection of the Silver Valley mining industry, even the expansion of the industry, a high priority in any Cleanup Plan.

A strong domestic mining industry is critical to our nation's future; a strong Silver Valley mining industry is an important component of that and is critical to the economic success of this region and its people. Thank you.

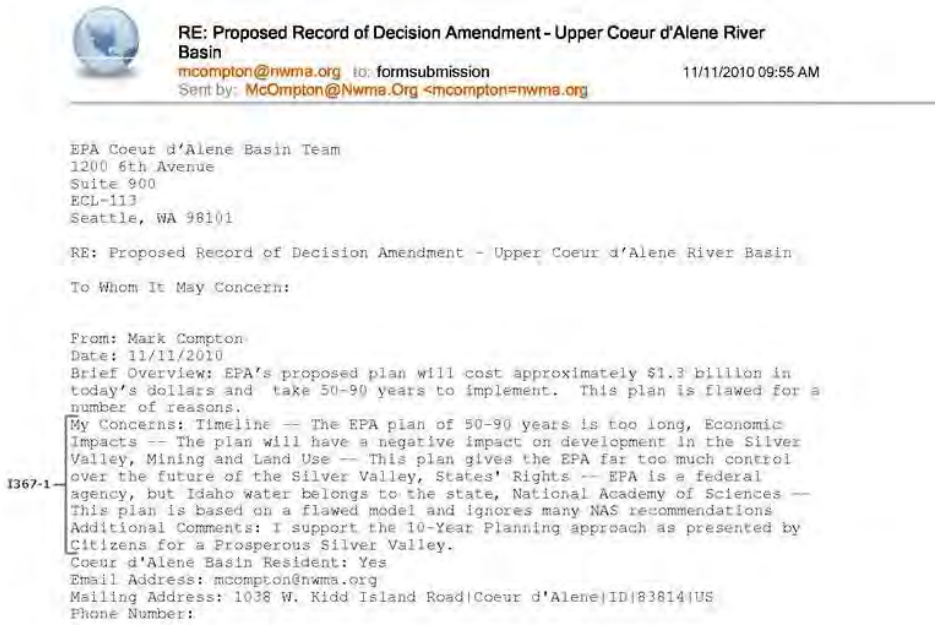
BOB WHEELER: Thank you, Mark. Robin Lake and Chris Carlson. I think it's Peg Carru.

ROBIN LAKE: Thank you. Thank you for the opportunity to be here this evening.

In my opinion, our government is a big, big machine that is out of control. The EPA is a

No comments

Compton, Mark, I367, Letter 616254



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mcompton@nwma.org to: formsubmission 11/11/2010 09:55 AM
Sent by: McOmpton@Nwma.Org <mcompton=nwma.org

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Mark Compton
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: mcompton@nwma.org
Mailing Address: 1038 W. Kidd Island Road|Coeur d'Alene|ID|83814|US
Phone Number:

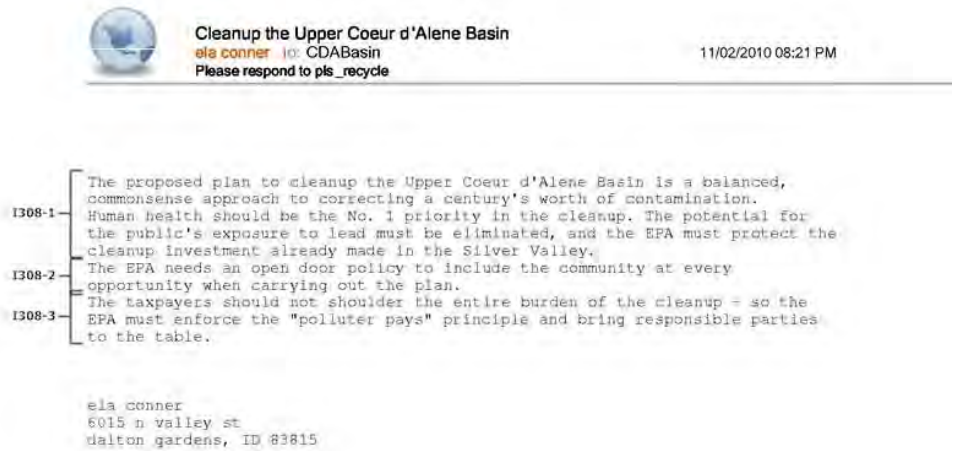
I367-1

616254

Response to comment I367-1

See response to Comment No. I351-1.

Conner, Ela, I308, Letter 614438



Cleanup the Upper Coeur d'Alene Basin
ela conner to: CDABasin 11/02/2010 08:21 PM
Please respond to pls_recycle

I308-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I308-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I308-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

ela conner
6015 n valley st
dalton gardens, ID 83815

614438

Response to comment I308-1

See response to Comment No. I295-1.

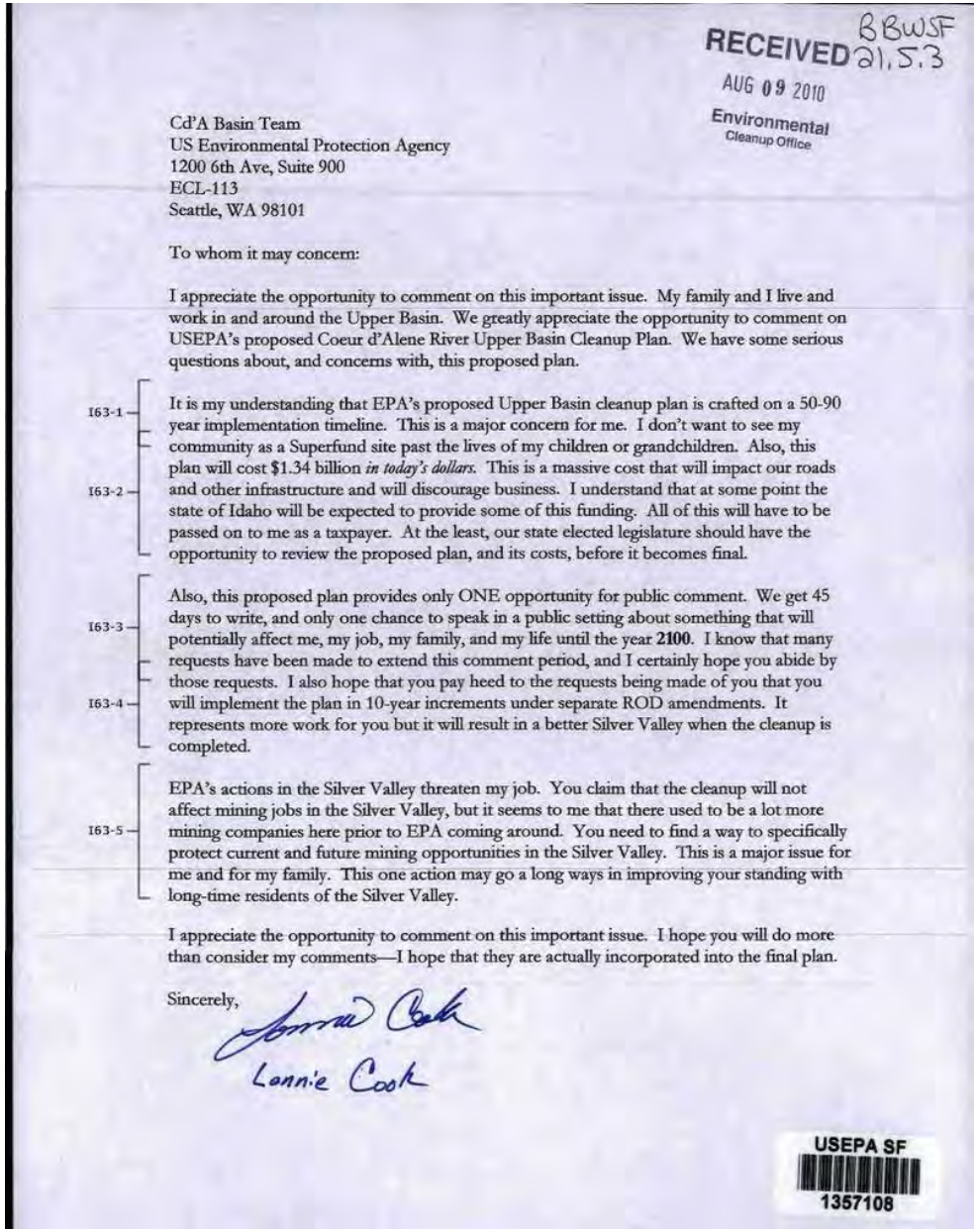
Response to comment I308-2

See response to Comment No. I295-2.

Response to comment I308-3

See response to Comment No. I295-3.

Cook, Lonnie, I63, Letter 1357108



RECEIVED
AUG 09 2010
Environmental
Cleanup Office

BBWSF 21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I63-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I63-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I63-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by
I63-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I63-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Lonnie Cook

USEPA SF
1357108

Response to comment I63-1
See response to Comment No. I58-1.

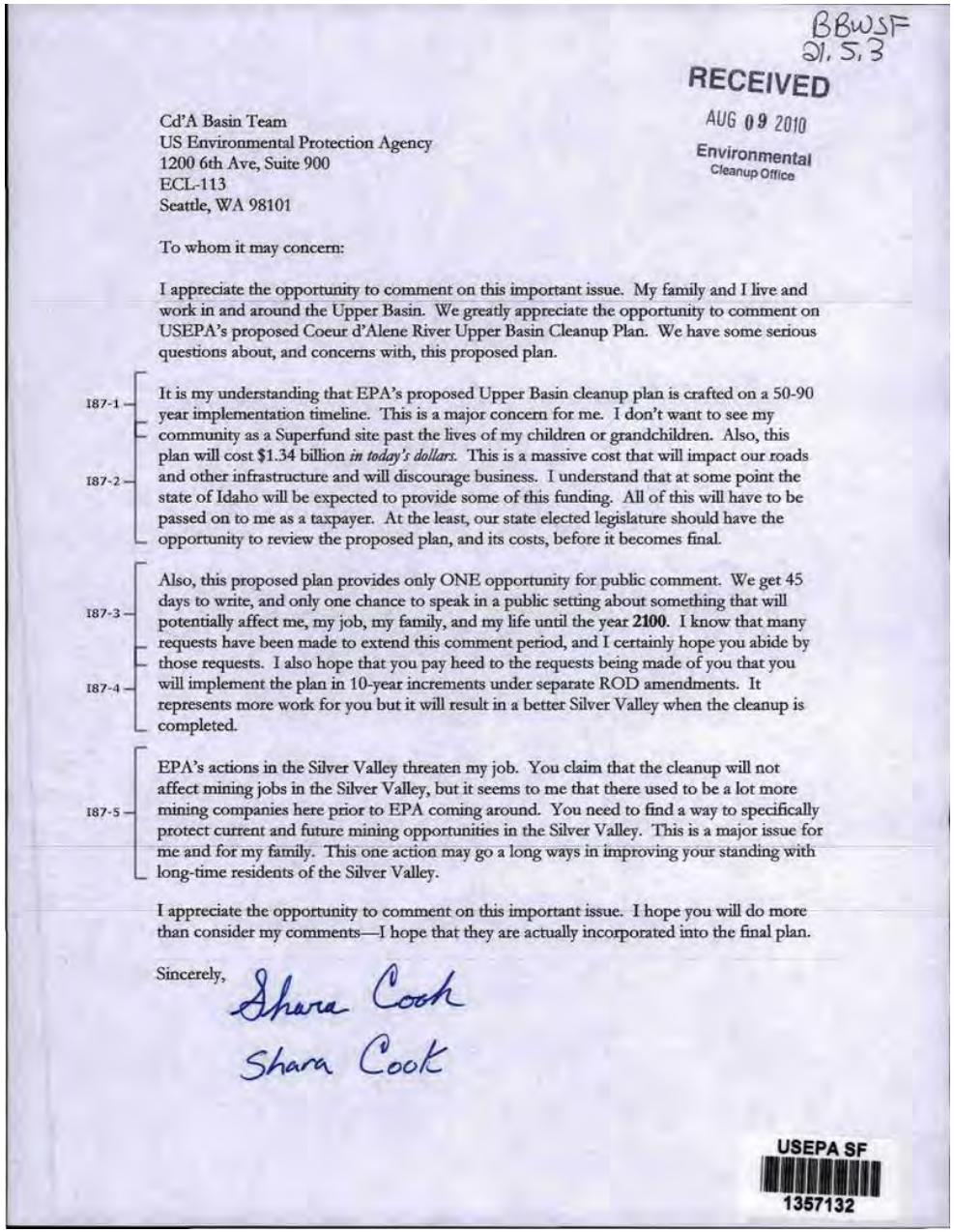
Response to comment I63-2
See response to Comment No. I58-2.

Response to comment I63-3
See response to Comment No. I58-3.

Response to comment I63-4
See response to Comment No. I58-4.

Response to comment I63-5
See response to Comment No. I58-5.

Cook, Shara, I87, Letter 1357132



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

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I87-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I87-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

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I87-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

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I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Shara Cook

Shara Cook

USEPA SF
1357132

Response to comment I87-1
See response to Comment No. I58-1.

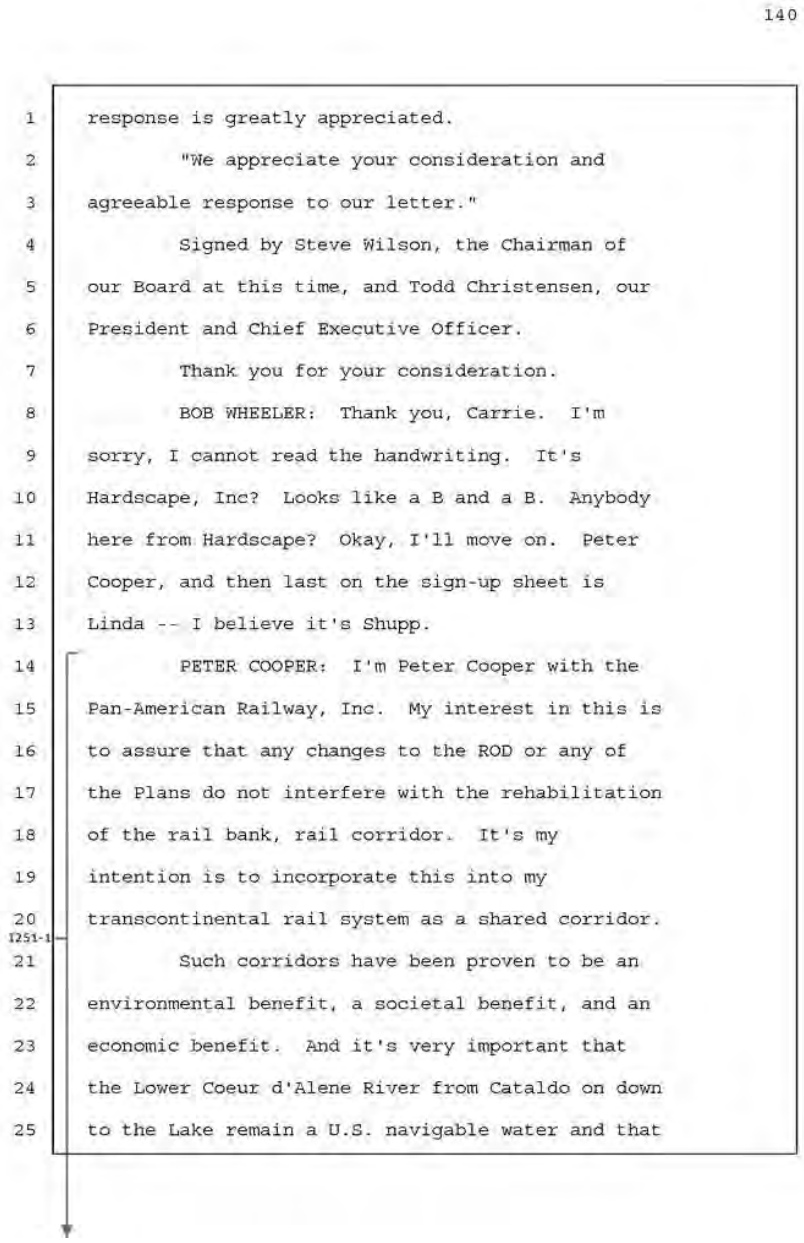
Response to comment I87-2
See response to Comment No. I58-2.

Response to comment I87-3
See response to Comment No. I58-3.

Response to comment I87-4
See response to Comment No. I58-4.

Response to comment I87-5
See response to Comment No. I58-5.

Cooper, Peter, I251, Letter 610097-46



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response is greatly appreciated.

"We appreciate your consideration and agreeable response to our letter."

Signed by Steve Wilson, the Chairman of our Board at this time, and Todd Christensen, our President and Chief Executive Officer.

Thank you for your consideration.

BOB WHEELER: Thank you, Carrie. I'm sorry, I cannot read the handwriting. It's Hardscape, Inc? Looks like a B and a B. Anybody here from Hardscape? Okay, I'll move on. Peter Cooper, and then last on the sign-up sheet is Linda -- I believe it's Shupp.

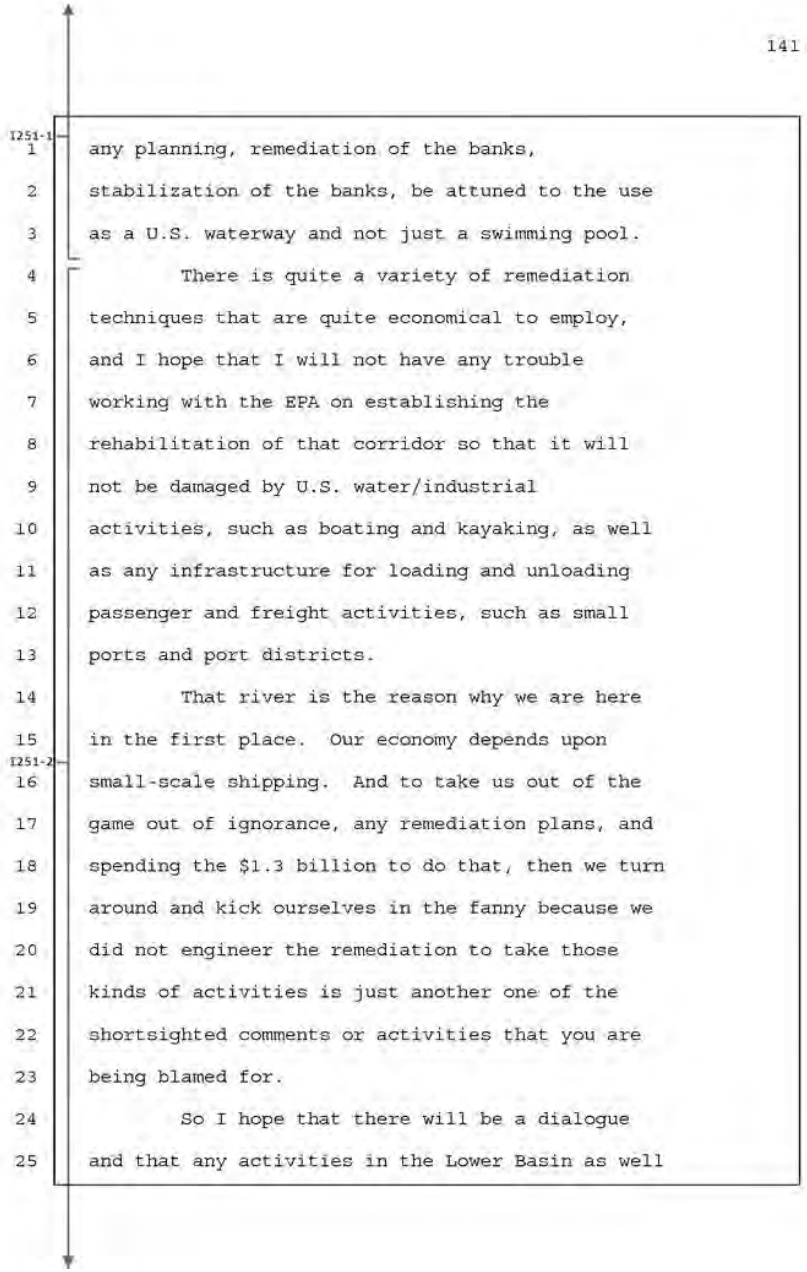
PETER COOPER: I'm Peter Cooper with the Pan-American Railway, Inc. My interest in this is to assure that any changes to the ROD or any of the Plans do not interfere with the rehabilitation of the rail bank, rail corridor. It's my intention is to incorporate this into my transcontinental rail system as a shared corridor.

I251-1

Such corridors have been proven to be an environmental benefit, a societal benefit, and an economic benefit. And it's very important that the Lower Coeur d'Alene River from Cataldo on down to the Lake remain a U.S. navigable water and that

Response to comment I251-1

Comment noted. Any reduction in stream flow due to water treatment in the Upper Basin will not affect the Couer d'Alene River. All water collected will be treated and discharged to the SFCDR near the Central Treatment Plant in Kellogg. Therefore, water will be replenished within the Upper Basin.



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I251-1
any planning, remediation of the banks, stabilization of the banks, be attuned to the use as a U.S. waterway and not just a swimming pool.

There is quite a variety of remediation techniques that are quite economical to employ, and I hope that I will not have any trouble working with the EPA on establishing the rehabilitation of that corridor so that it will not be damaged by U.S. water/industrial activities, such as boating and kayaking, as well as any infrastructure for loading and unloading passenger and freight activities, such as small ports and port districts.

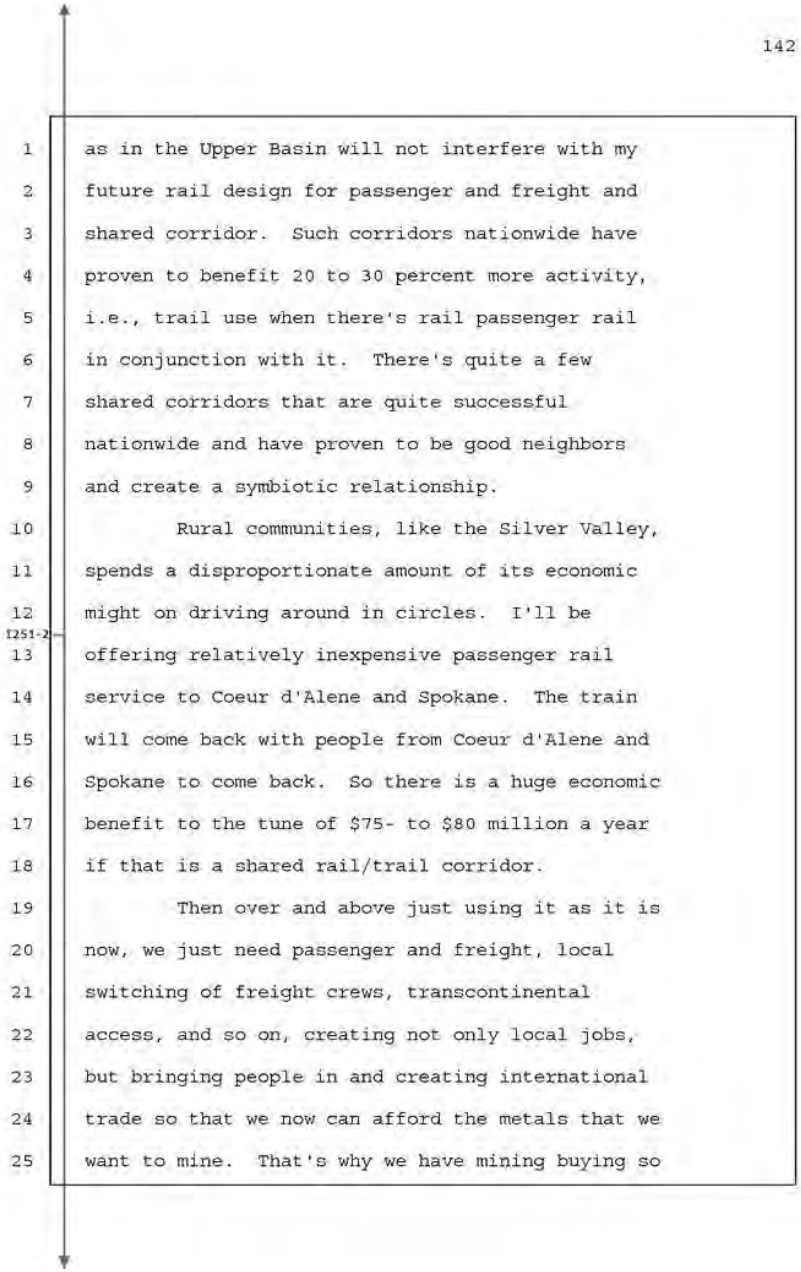
That river is the reason why we are here in the first place. Our economy depends upon

I251-2
small-scale shipping. And to take us out of the game out of ignorance, any remediation plans, and spending the $1.3 billion to do that, then we turn around and kick ourselves in the fanny because we did not engineer the remediation to take those kinds of activities is just another one of the shortsighted comments or activities that you are being blamed for.

So I hope that there will be a dialogue and that any activities in the Lower Basin as well

Response to comment I251-2

Thank you for your comment.



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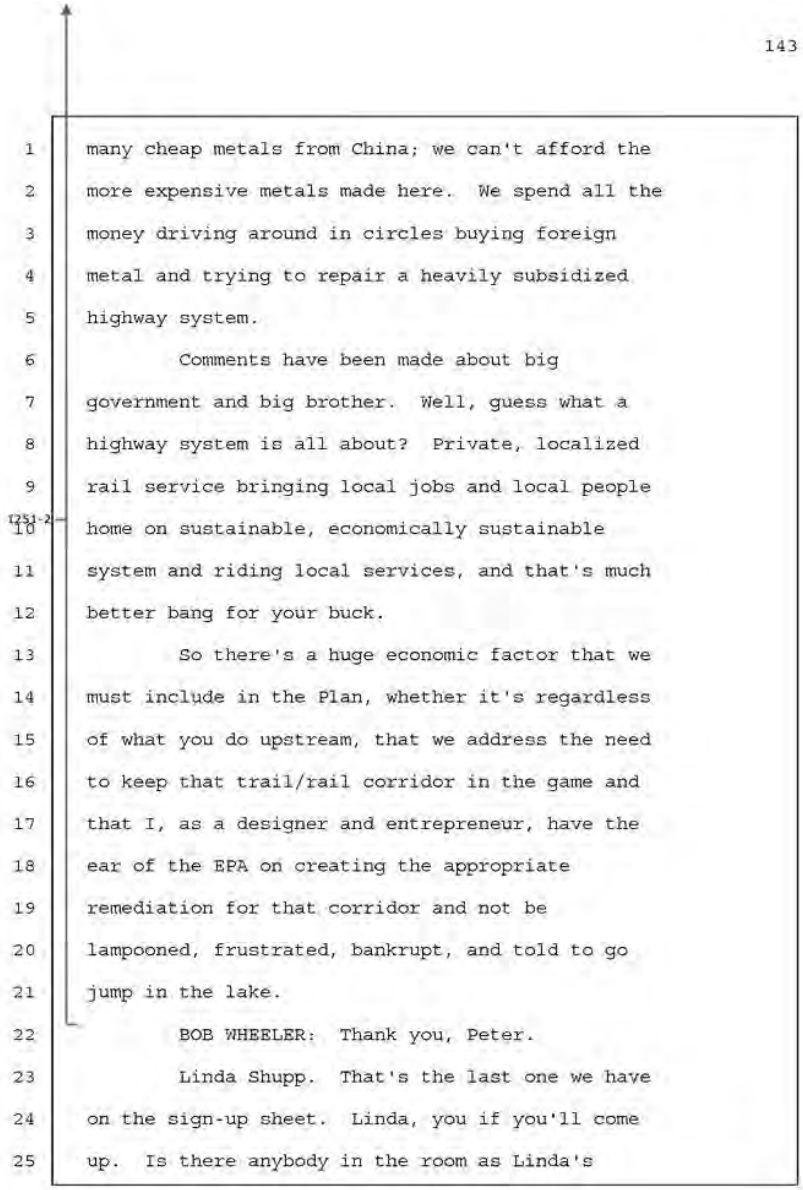
as in the Upper Basin will not interfere with my future rail design for passenger and freight and shared corridor. Such corridors nationwide have proven to benefit 20 to 30 percent more activity, i.e., trail use when there's rail passenger rail in conjunction with it. There's quite a few shared corridors that are quite successful nationwide and have proven to be good neighbors and create a symbiotic relationship.

Rural communities, like the Silver Valley, spends a disproportionate amount of its economic might on driving around in circles. I'll be offering relatively inexpensive passenger rail service to Coeur d'Alene and Spokane. The train will come back with people from Coeur d'Alene and Spokane to come back. So there is a huge economic benefit to the tune of $75- to $80 million a year if that is a shared rail/trail corridor.

I251-2

Then over and above just using it as it is now, we just need passenger and freight, local switching of freight crews, transcontinental access, and so on, creating not only local jobs, but bringing people in and creating international trade so that we now can afford the metals that we want to mine. That's why we have mining buying so

No comments



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many cheap metals from China; we can't afford the more expensive metals made here. We spend all the money driving around in circles buying foreign metal and trying to repair a heavily subsidized highway system.

Comments have been made about big government and big brother. Well, guess what a highway system is all about? Private, localized rail service bringing local jobs and local people home on sustainable, economically sustainable system and riding local services, and that's much better bang for your buck. I251-2

So there's a huge economic factor that we must include in the Plan, whether it's regardless of what you do upstream, that we address the need to keep that trail/rail corridor in the game and that I, as a designer and entrepreneur, have the ear of the EPA on creating the appropriate remediation for that corridor and not be lampooned, frustrated, bankrupt, and told to go jump in the lake.

BOB WHEELER: Thank you, Peter.

Linda Shupp. That's the last one we have on the sign-up sheet. Linda, you if you'll come up. Is there anybody in the room as Linda's

No comments

Cooper, Dean, I573, Letter 617582

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
cooperdeanm@yahoo.com to: formsubmission 11/19/2010 08:52 AM
Sent by: Cooperdeanm@Yahoo.Com <cooperdeanm=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Dean Cooper
Date: 11/19/2010
Brief Overview: As a citizen of Wallace, owner of multiple businesses, homeowner, commercial real estate owner and member of the Wallace City Council I feel the EPA's proposed plan has numerous challenges. If you can't get something done in the first 10 years, it shouldn't be part of the plan. They built the Panama Canal in less than 10 years. Further, if you don't involve the people that live here and are being most impacted you're just being a bully and imposing your ideals on us. We have all chose to live here as it is, let us decide and play a part in what it becomes. You put this huge expense out there, but don't have money to pay for it. Put a plan together for the money you have, nothing more. When you get more money, spend it. You're our government, be responsible!

I573-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 milllon will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations

I573-2 Additional Comments: You need to have goals so that progress can be measured. Those goals should focus on human health. If you do focus on fish, keep your comparisons local. Test against fish in these streams and rivers. Measure your accomplishments against your targets and then you can decide what to do next.

I573-3 This plan leaves raw sewage going into the North Fork of the CdA River. I don't know how that is left out of a plan, are you kidding me? Not only is it gross, but to pipe a bunch of water from remote mine sites to Kellogg and not put in a sewer is idiotic at best. I realize you say you have rules that don't allow you to do this, but other rules have been adapted. You need to

617582

Response to comment I573-1

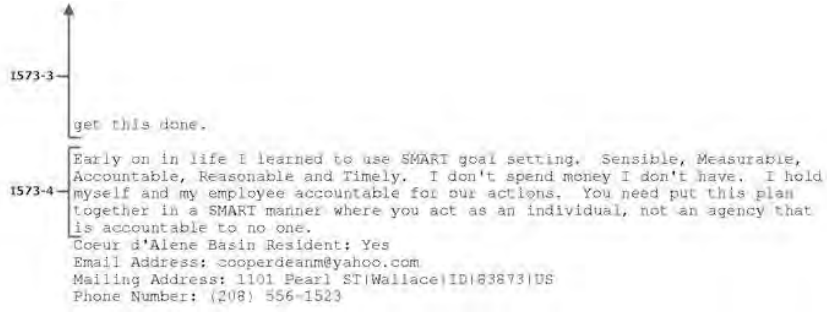
See response to Comment No. I351-1.

Response to comment I573-2

See the ROD Amendment, Part 2, Section 8.0 regarding remedial action objectives and cleanup levels for the Selected Remedy. As to human health see response to Comment No. I295-2. Regarding the implementation of the Selected Remedy, see the ROD Amendment, Part 2, Section 12.3.

Response to comment I573-3

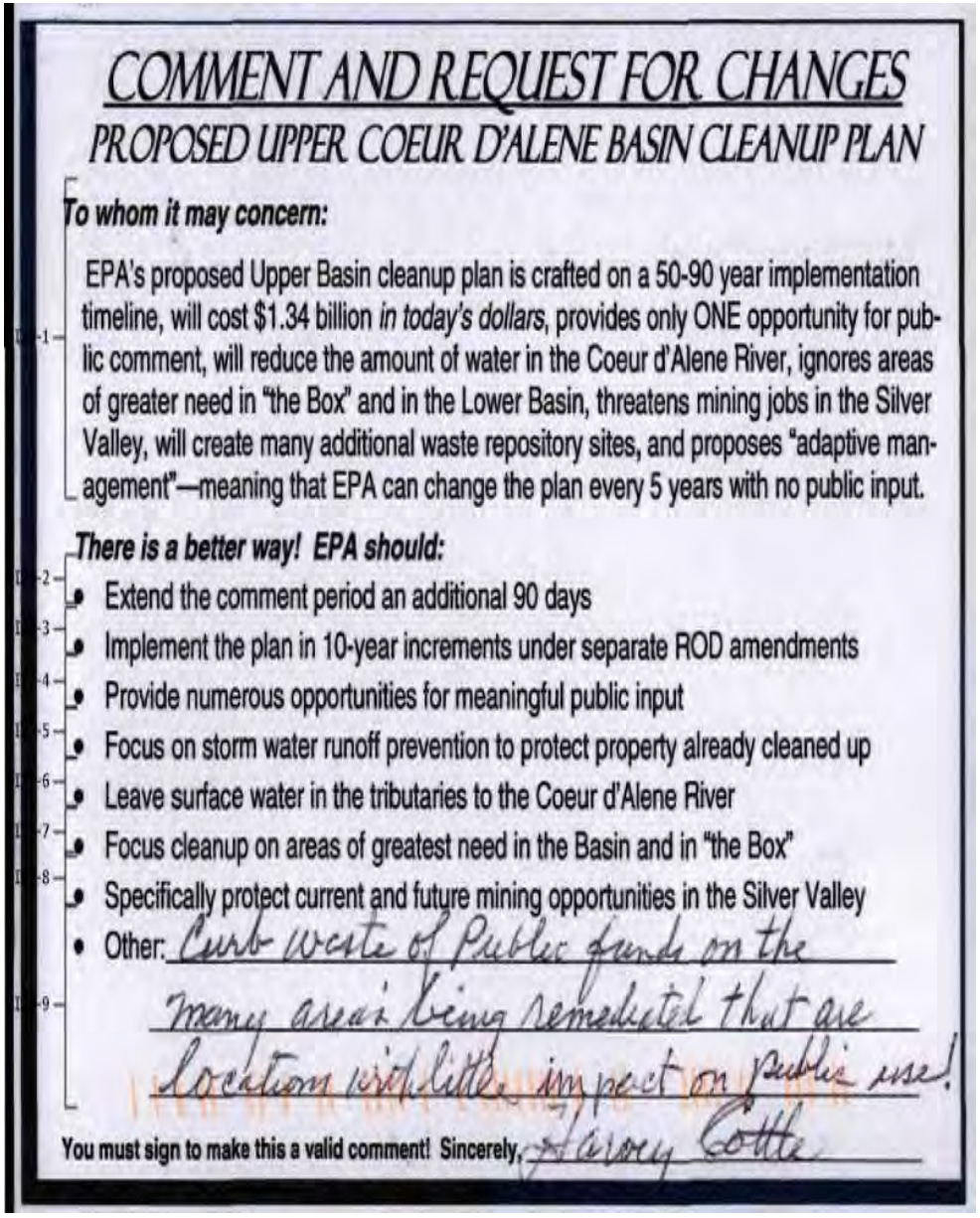
As noted in the ROD Amendment, EPA has not selected remedies for the North Fork as part of this action. The North Fork is being addressed under CERCLA by other (non-EPA) agencies, primarily the U.S. Forest Service. However, discharges of raw sewage are not within the purview of CERCLA and would be covered by other statutes.



Response to comment I573-4

See response to Comment No. LJ39-5.

Cottle, Harvey, I29, Letter 1357073



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I1-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I1-2 • Extend the comment period an additional 90 days
I1-3 • Implement the plan in 10-year increments under separate ROD amendments
I1-4 • Provide numerous opportunities for meaningful public input
I1-5 • Focus on storm water runoff prevention to protect property already cleaned up
I1-6 • Leave surface water in the tributaries to the Coeur d'Alene River
I1-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
I1-8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other: Curb waste of Public funds on the many areas being remediated that are location with little impact on Public use!

I1-9

You must sign to make this a valid comment! Sincerely, Harvey Cottle

Response to comment I29-1
See response to Comment No. I25-1.

Response to comment I29-2
See response to Comment No. I25-2.

Response to comment I29-3
See response to Comment No. I25-3.

Response to comment I29-4
See response to Comment No. I25-4.

Response to comment I29-5
See response to Comment No. I25-5.

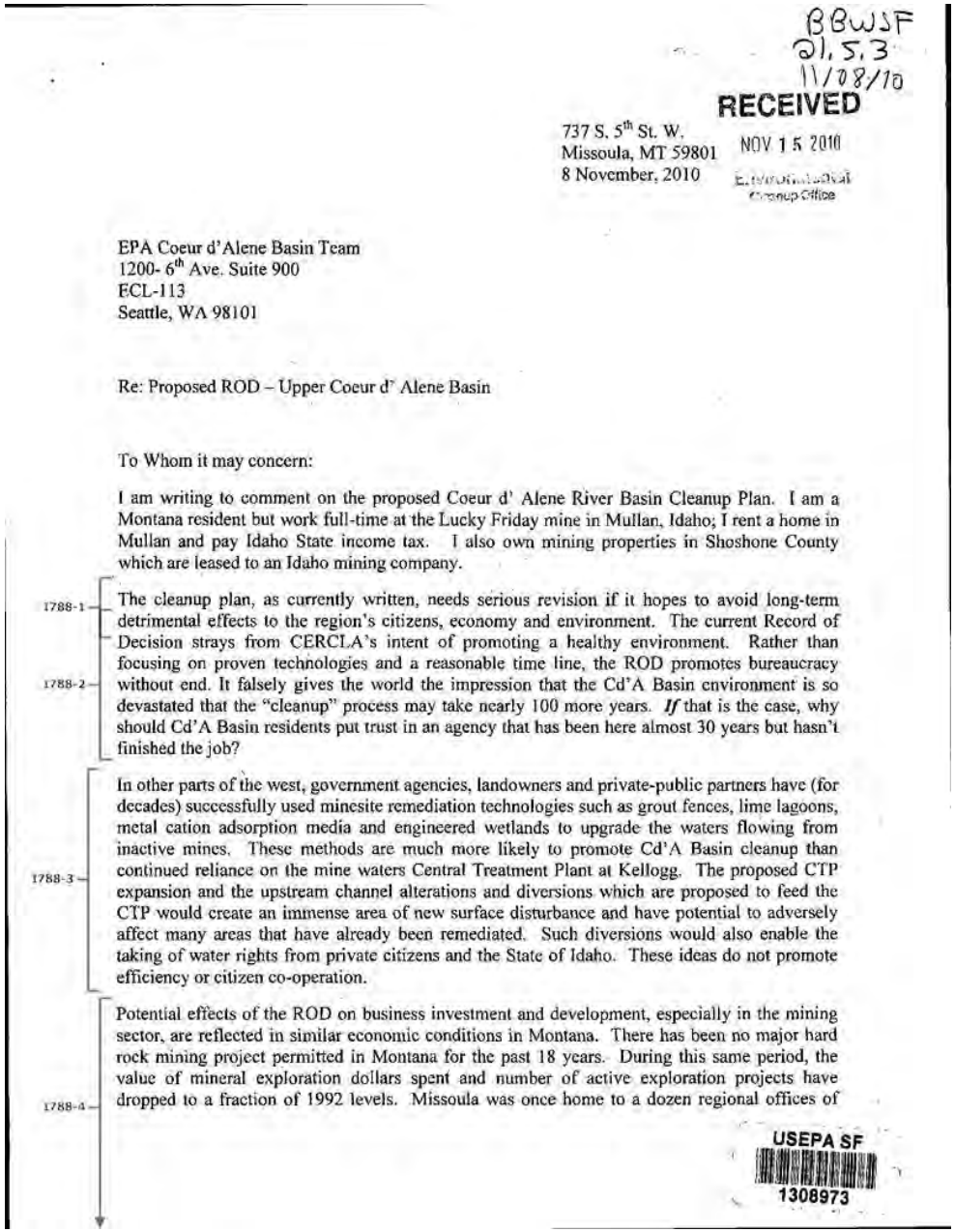
Response to comment I29-6
See response to Comment No. I25-6.

Response to comment I29-7
See response to Comment No. I25-7.

Response to comment I29-8
See response to Comment No. I25-8.

Response to comment I29-9
See responses to Comment Nos. I58-1 and I58-2.

Cox, Bruce, I788, Letter 1308973



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11/08/10

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NOV 15 2010
Environmental Cleanup Office

737 S. 5th St. W.
Missoula, MT 59801
8 November, 2010

EPA Coeur d'Alene Basin Team
1200- 6th Ave. Suite 900
ECL-113
Seattle, WA 98101

Re: Proposed ROD – Upper Coeur d' Alene Basin

To Whom it may concern:

I am writing to comment on the proposed Coeur d' Alene River Basin Cleanup Plan. I am a Montana resident but work full-time at the Lucky Friday mine in Mullan, Idaho; I rent a home in Mullan and pay Idaho State income tax. I also own mining properties in Shoshone County which are leased to an Idaho mining company.

I788-1 The cleanup plan, as currently written, needs serious revision if it hopes to avoid long-term detrimental effects to the region's citizens, economy and environment. The current Record of Decision strays from CERCLA's intent of promoting a healthy environment. Rather than focusing on proven technologies and a reasonable time line, the ROD promotes bureaucracy

I788-2 without end. It falsely gives the world the impression that the Cd'A Basin environment is so devastated that the "cleanup" process may take nearly 100 more years. *If* that is the case, why should Cd'A Basin residents put trust in an agency that has been here almost 30 years but hasn't finished the job?

I788-3 In other parts of the west, government agencies, landowners and private-public partners have (for decades) successfully used minesite remediation technologies such as grout fences, lime lagoons, metal cation adsorption media and engineered wetlands to upgrade the waters flowing from inactive mines. These methods are much more likely to promote Cd'A Basin cleanup than continued reliance on the mine waters Central Treatment Plant at Kellogg. The proposed CTP expansion and the upstream channel alterations and diversions which are proposed to feed the CTP would create an immense area of new surface disturbance and have potential to adversely affect many areas that have already been remediated. Such diversions would also enable the taking of water rights from private citizens and the State of Idaho. These ideas do not promote efficiency or citizen co-operation.

I788-4 Potential effects of the ROD on business investment and development, especially in the mining sector, are reflected in similar economic conditions in Montana. There has been no major hard rock mining project permitted in Montana for the past 18 years. During this same period, the value of mineral exploration dollars spent and number of active exploration projects have dropped to a fraction of 1992 levels. Missoula was once home to a dozen regional offices of

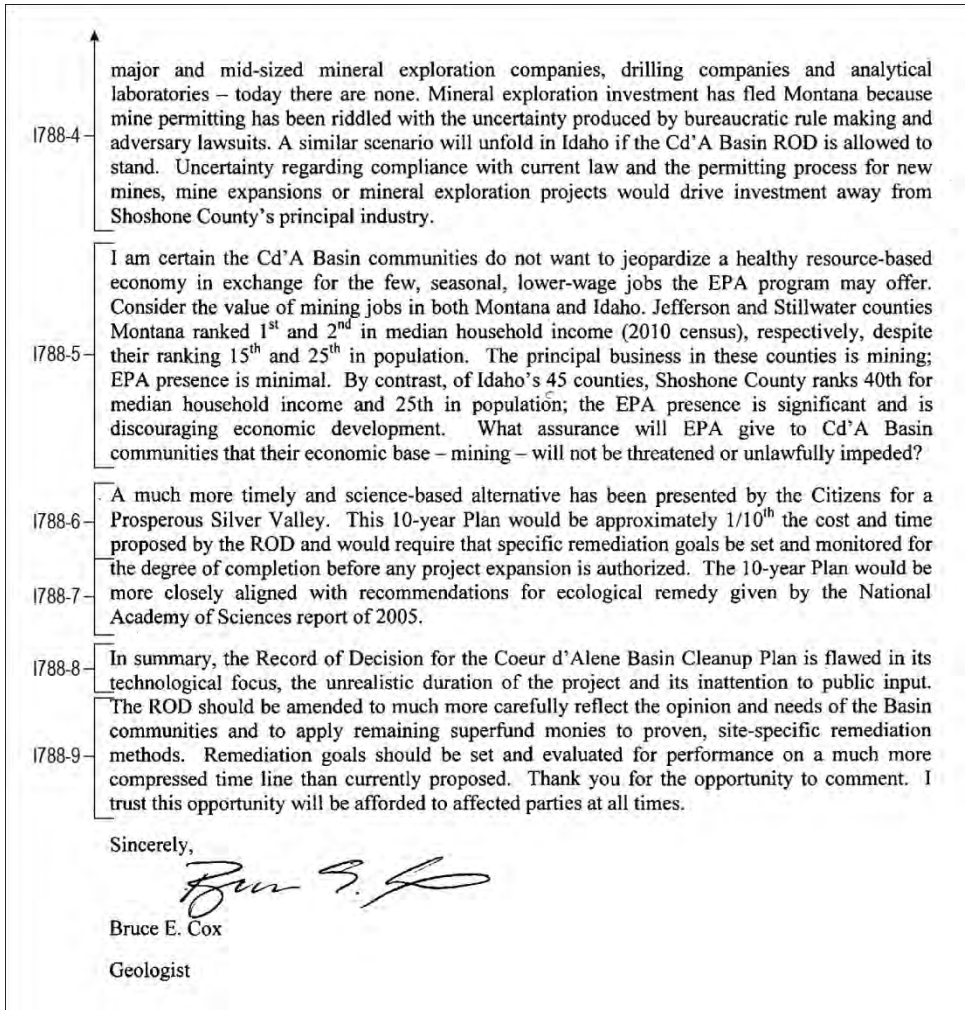
USEPA SF
1308973

Response to comment I788-1
See response to Comment No. I54-2.

Response to comment I788-2
See response to Comment No. I58-1.

Response to comment I788-3
Onsite semi-passive treatment technologies will be used as part of the Selected Remedy, including a lime lagoon-type system and sulfate reducing bioreactors. However, for some sites, conveyance and treatment at the existing Central Treatment Plant (CTP) is the least costly option, both in terms of capital and operations and maintenance costs. Waters conveyed to the CTP for treatment will consist of either groundwater collected in subsurface drains or adit drainages collected at the source of discharge and conveyed within pipes to the CTP. There will be no channel alternations or diversions. There will be no disturbance of areas already remediated. The flows of contaminated water collected for treatment at the CTP are not expected to impact water rights holders (see response to Comment No. SA4-12).

Response to comment I788-4
See response to Comment No. I58-5.



major and mid-sized mineral exploration companies, drilling companies and analytical laboratories – today there are none. Mineral exploration investment has fled Montana because mine permitting has been riddled with the uncertainty produced by bureaucratic rule making and adversary lawsuits. A similar scenario will unfold in Idaho if the Cd'A Basin ROD is allowed to stand. Uncertainty regarding compliance with current law and the permitting process for new mines, mine expansions or mineral exploration projects would drive investment away from Shoshone County's principal industry.

I788-4

I am certain the Cd'A Basin communities do not want to jeopardize a healthy resource-based economy in exchange for the few, seasonal, lower-wage jobs the EPA program may offer. Consider the value of mining jobs in both Montana and Idaho. Jefferson and Stillwater counties Montana ranked 1st and 2nd in median household income (2010 census), respectively, despite their ranking 15th and 25th in population. The principal business in these counties is mining; EPA presence is minimal. By contrast, of Idaho's 45 counties, Shoshone County ranks 40th for median household income and 25th in population; the EPA presence is significant and is discouraging economic development. What assurance will EPA give to Cd'A Basin communities that their economic base – mining – will not be threatened or unlawfully impeded?

I788-5

A much more timely and science-based alternative has been presented by the Citizens for a Prosperous Silver Valley. This 10-year Plan would be approximately 1/10th the cost and time proposed by the ROD and would require that specific remediation goals be set and monitored for the degree of completion before any project expansion is authorized. The 10-year Plan would be more closely aligned with recommendations for ecological remedy given by the National Academy of Sciences report of 2005.

I788-6

I788-7

In summary, the Record of Decision for the Coeur d'Alene Basin Cleanup Plan is flawed in its technological focus, the unrealistic duration of the project and its inattention to public input. The ROD should be amended to much more carefully reflect the opinion and needs of the Basin communities and to apply remaining superfund monies to proven, site-specific remediation methods. Remediation goals should be set and evaluated for performance on a much more compressed time line than currently proposed. Thank you for the opportunity to comment. I trust this opportunity will be afforded to affected parties at all times.

I788-8

I788-9

Sincerely,

Bruce E. Cox

Geologist

Response to comment I788-5

See response to Comment No. I58-5.

Response to comment I788-6

See response to Comment No. I474-2.

Response to comment I788-7

See response to Comment No. I474-2.

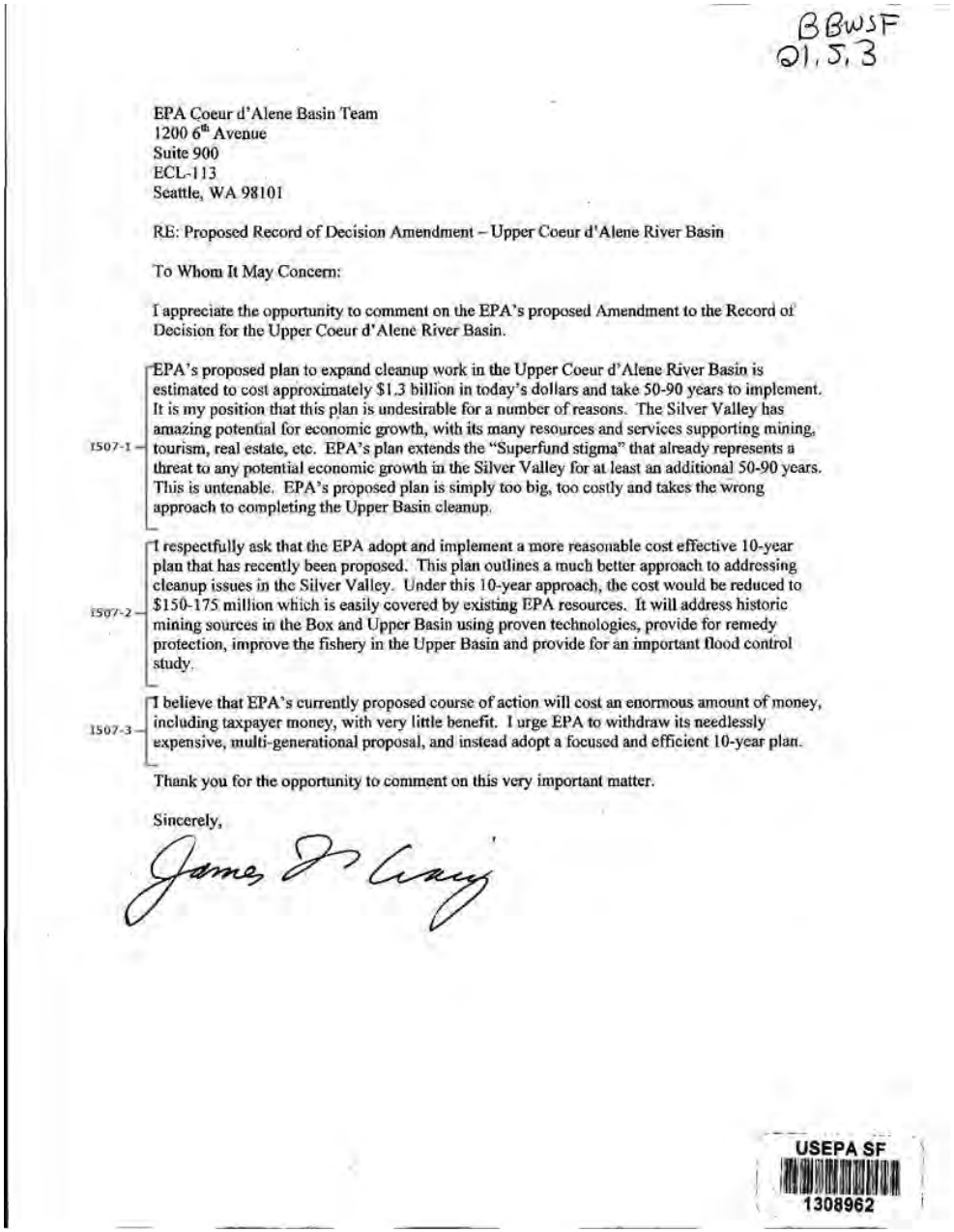
Response to comment I788-8

See responses to Comment Nos. I58-1 and I58-4.

Response to comment I788-9

The ROD Amendment, including the Selected Remedy, was developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as required by CERCLA. EPA's goal is to complete the cleanup in the Basin as quickly as possible and with minimum disruption. EPA is required by law to ensure protection of human health and the environment. The Upper Basin is a large area with complicated contamination issues that have evolved over a long period of time. The extent and nature of the contamination dictate that it will take substantial time and resources to clean up. The ROD Amendment provides details regarding the implementation approach for the Selected Remedy, including where the work starts and how it will proceed over time. With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT over the last several years, EPA developed a logical and transparent prioritization process for cleanup actions. Using this prioritization process, the Selected Remedy, an interim action, focuses on a prioritized set of cleanup actions. The actions include the most contaminated drainages (i.e., Ninemile and Canyon Creeks), areas that have the greatest adverse impact on groundwater and surface water (e.g., OU 2), and actions that provide protection for existing remedies. This process of prioritizing actions included in the Selected Remedy is consistent with the adaptive management approach. The estimated time for implementing the Selected Remedy is about thirty years. Also see response to Comment No. I59-1.

Craig, James, I507, Letter 1308962



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I507-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I507-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I507-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

James D Craig

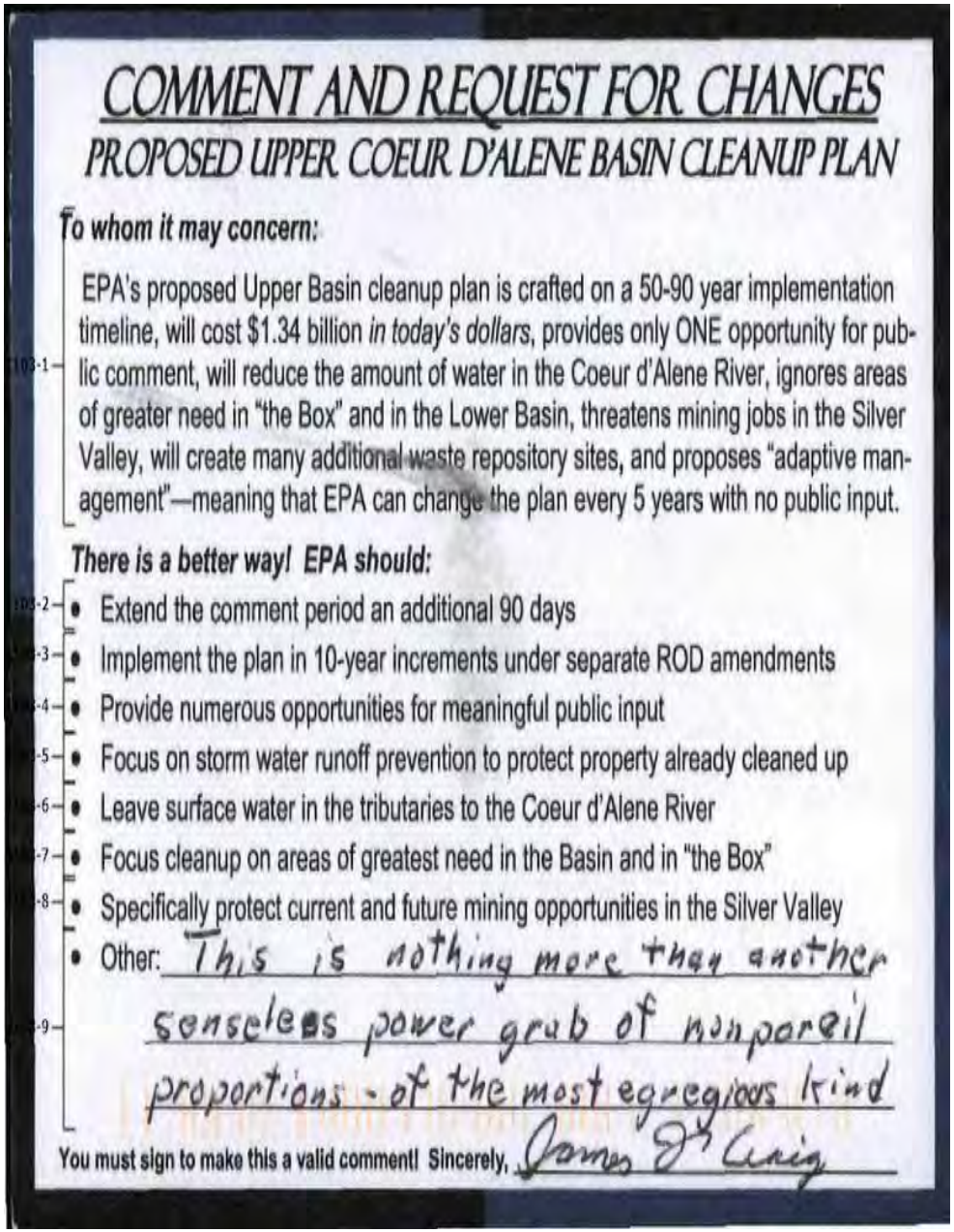
USEPA SF
1308962

Response to comment I507-1
See response to Comment No. I474-1.

Response to comment I507-2
See response to Comment No. I474-2.

Response to comment I507-3
See response to Comment No. I474-3.

Craig, James, I103, Letter 1357150



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I103-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I103-2 • Extend the comment period an additional 90 days
I103-3 • Implement the plan in 10-year increments under separate ROD amendments
I103-4 • Provide numerous opportunities for meaningful public input
I103-5 • Focus on storm water runoff prevention to protect property already cleaned up
I103-6 • Leave surface water in the tributaries to the Coeur d'Alene River
I103-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
I103-8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other: This is nothing more than another senseless power grab of nonpareil proportions - of the most egregious kind
I103-9

You must sign to make this a valid comment! Sincerely, James D. Craig

Response to comment I103-1
See response to Comment No. I25-1.

Response to comment I103-2
See response to Comment No. I25-2.

Response to comment I103-3
See response to Comment No. I25-3.

Response to comment I103-4
See response to Comment No. I25-4.

Response to comment I103-5
See response to Comment No. I25-5.

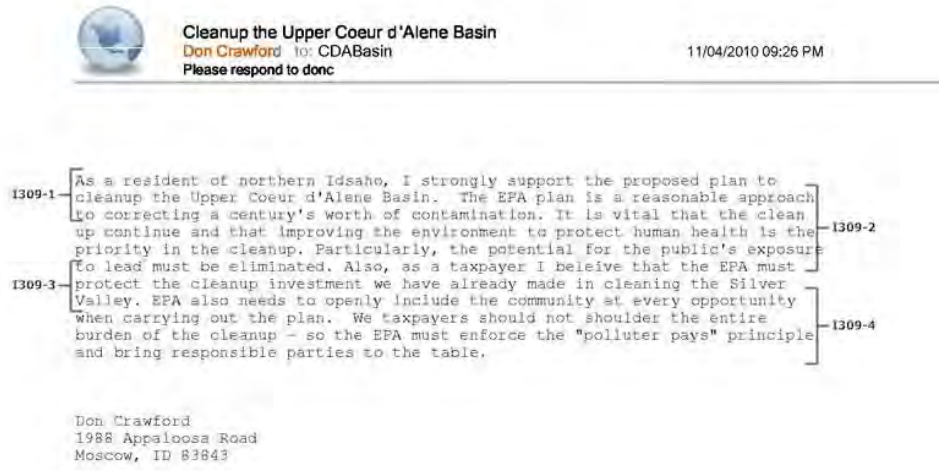
Response to comment I103-6
See response to Comment No. I25-6.

Response to comment I103-7
See response to Comment No. I25-7.

Response to comment I103-8
See response to Comment No. I25-8.

Response to comment I103-9
Comment noted. Also see response to Comment No. I295-1.

Crawford, Don, I309, Letter 614439



Cleanup the Upper Coeur d'Alene Basin
Don Crawford to: CDABasin 11/04/2010 09:26 PM
Please respond to donc

I309-1 As a resident of northern Idsaho, I strongly support the proposed plan to cleanup the Upper Coeur d'Alene Basin. The EPA plan is a reasonable approach to correcting a century's worth of contamination. It is vital that the clean up continue and that improving the environment to protect human health is the priority in the cleanup. Particularly, the potential for the public's exposure to lead must be eliminated. Also, as a taxpayer I beleive that the EPA must I309-3 protect the cleanup investment we have already made in cleaning the Silver Valley. EPA also needs to openly include the community at every opportunity when carrying out the plan. We taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

I309-2

I309-4

Don Crawford
1988 Appaloosa Road
Moscow, ID 83843

614439

Response to comment I309-1

Comment noted and appreciated.

Response to comment I309-2

See response to Comment No. I295-1.

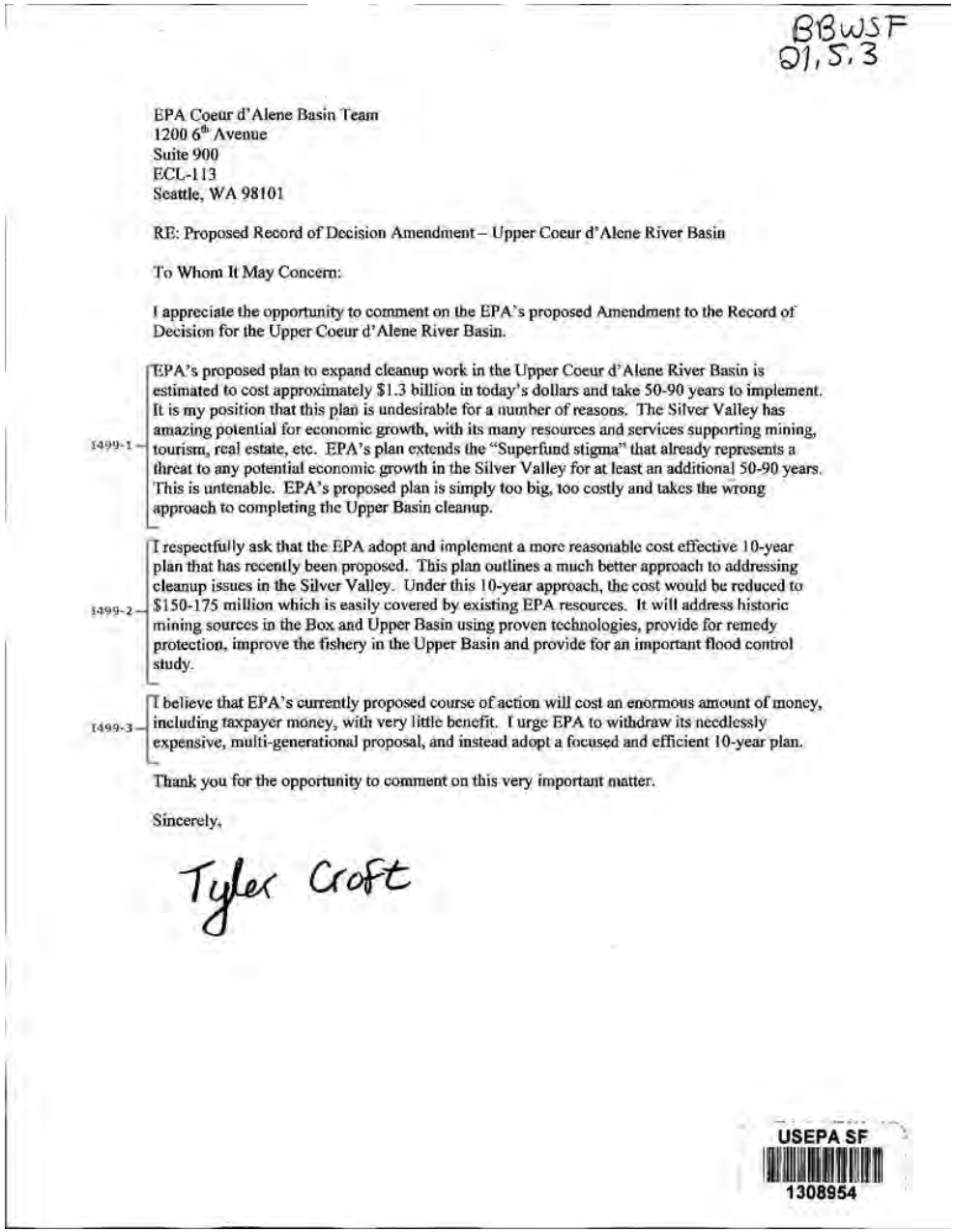
Response to comment I309-3

See responses to Comment Nos. I54-5 and LJ36-3.

Response to comment I309-4

See responses to Comment Nos. I295-2 and I295-3.

Croft, Tyler, I499, Letter 1308954



BBWSF
01,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I499-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I499-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I499-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Tyler Croft

USEPA SF
1308954

Response to comment I499-1

See response to Comment No. I474-1.

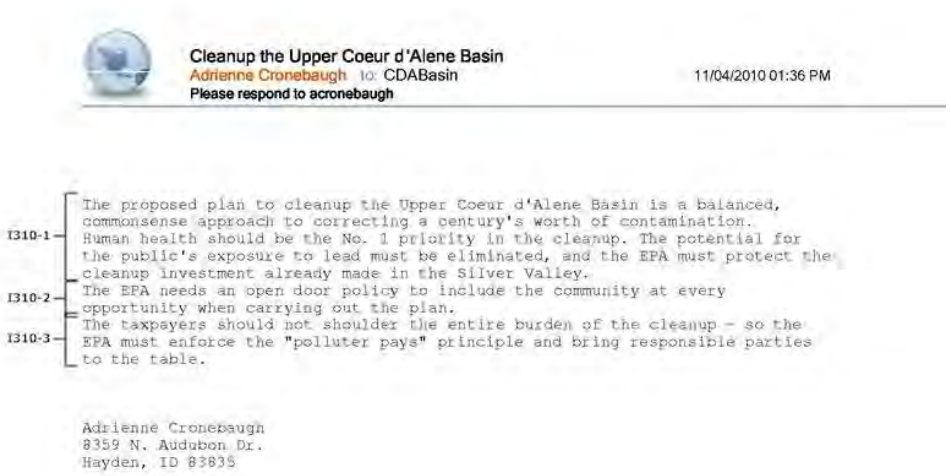
Response to comment I499-2

See response to Comment No. I474-2.

Response to comment I499-3

See response to Comment No. I474-3.

Cronebaugh, Adrienne, I310, Letter 614440



Cleanup the Upper Coeur d'Alene Basin
Adrienne Cronebaugh to: CDABasin 11/04/2010 01:36 PM
Please respond to acronebaugh

I310-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I310-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I310-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Adrienne Cronebaugh
8359 N. Audubon Dr.
Hayden, ID 83835

614440

Response to comment I310-1

See response to Comment No. I295-1.

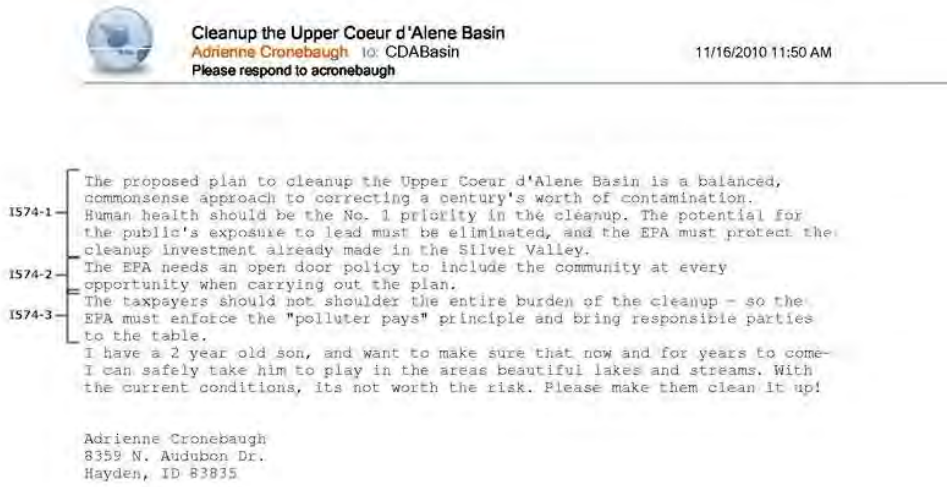
Response to comment I310-2

See response to Comment No. I295-2.

Response to comment I310-3

See response to Comment No. I295-3.

Cronebaugh, Adrienne, I574, Letter 617755



Cleanup the Upper Coeur d'Alene Basin
Adrienne Cronebaugh to: CDABasin 11/16/2010 11:50 AM
Please respond to acronebaugh

I574-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I574-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I574-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

I have a 2 year old son, and want to make sure that now and for years to come I can safely take him to play in the areas beautiful lakes and streams. With the current conditions, its not worth the risk. Please make them clean it up!

Adrienne Cronebaugh
8359 N. Audubon Dr.
Hayden, ID 83835

617755

Response to comment I574-1

See response to Comment No. I295-1.

Response to comment I574-2

See response to Comment No. I295-2.

Response to comment I574-3

See response to Comment No. I295-3.

Cronister, Jennie, I575, Letter 617756

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
luvmyhusky43@gmail.com to: formsubmission 11/16/2010 10:26 PM
Sent by: Luvmyhusky43@Gmail.Com <luvmyhusky43=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: jennie Cronister
Date: 11/16/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: luvmyhusky43@gmail.com
Mailing Address:
Phone Number:

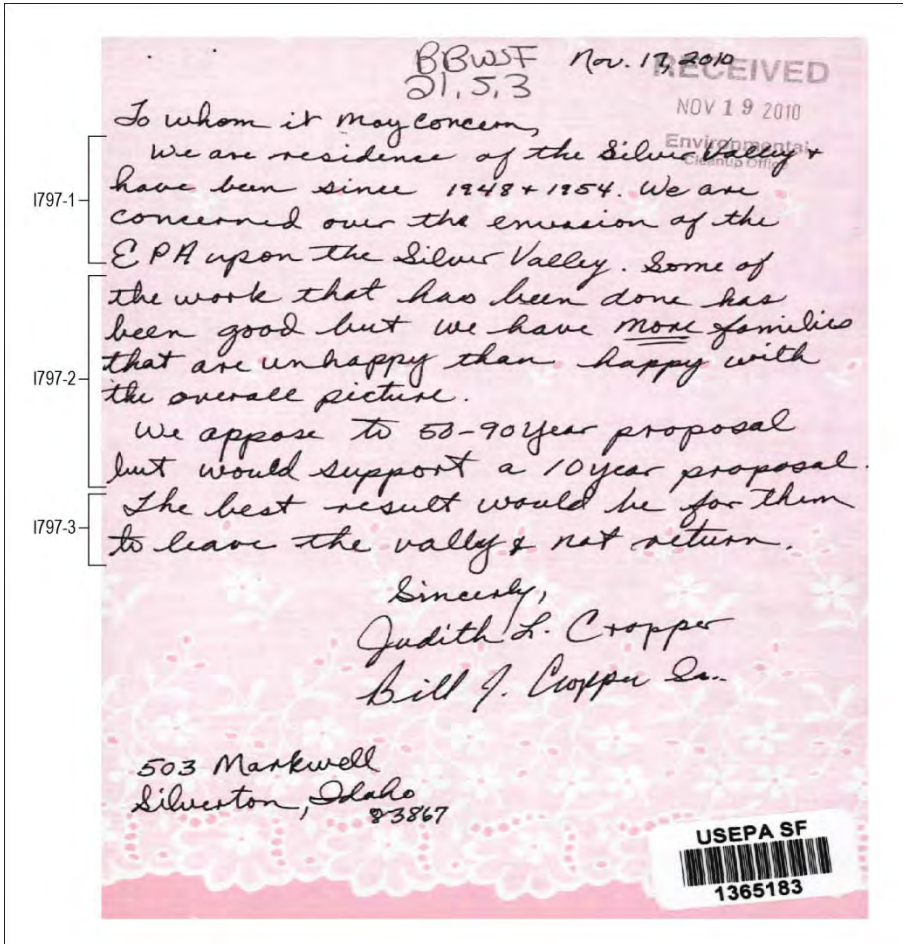
I575-1

617756

Response to comment I575-1

See response to Comment No. I351-1.

Cropper, Judith, I797, Letter 1365183



BBWF Nov. 17, 2010
21,5,3

RECEIVED
NOV 19 2010
Environmental Cleanups Office

To whom it may concern,

I797-1 We are residence of the Silver Valley & have been since 1948 + 1954. We are concerned over the invasion of the EPA upon the Silver Valley. Some of

I797-2 the work that has been done has been good but we have more families that are unhappy than happy with the overall picture.

We appose to 50-90 year proposal but would support a 10 year proposal.

I797-3 The best result would be for them to leave the valley & not return.

Sincerely,
Judith L. Cropper
Bill J. Cropper Sr.

503 Markwell
Silverton, Idaho
83867

USEPA SF
1365183

Response to comment I797-1

Comment noted.

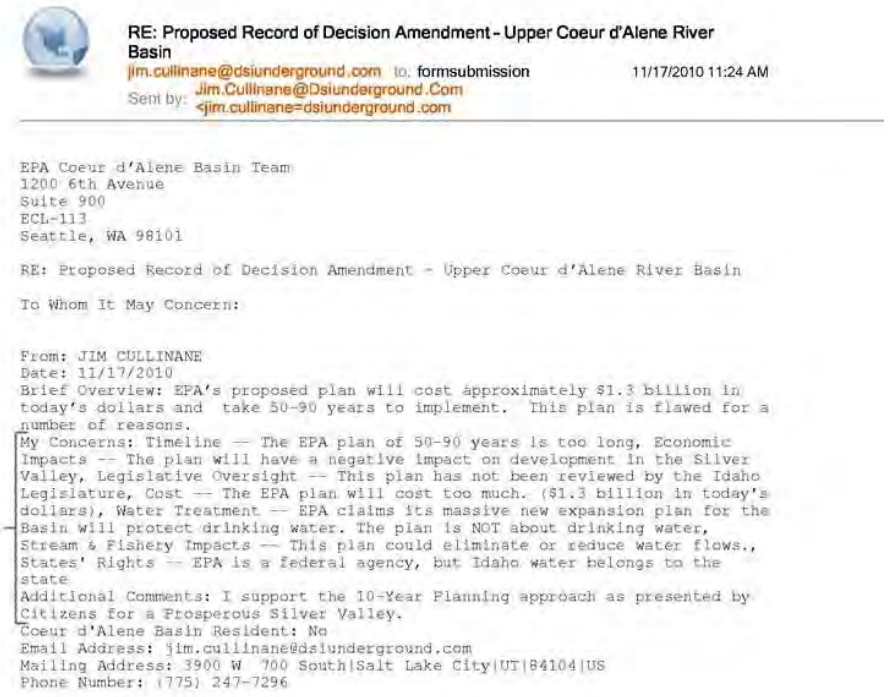
Response to comment I797-2

See responses to Comment Nos. I58-1 and I474-2.

Response to comment I797-3

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Cullinane, Jim, I576, Letter 617757



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jim.cullinane@dsiunderground.com to: formsubmission 11/17/2010 11:24 AM
Sent by: Jim.Cullinane@Dsiunderground.Com <jim.cullinane=dsiunderground.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

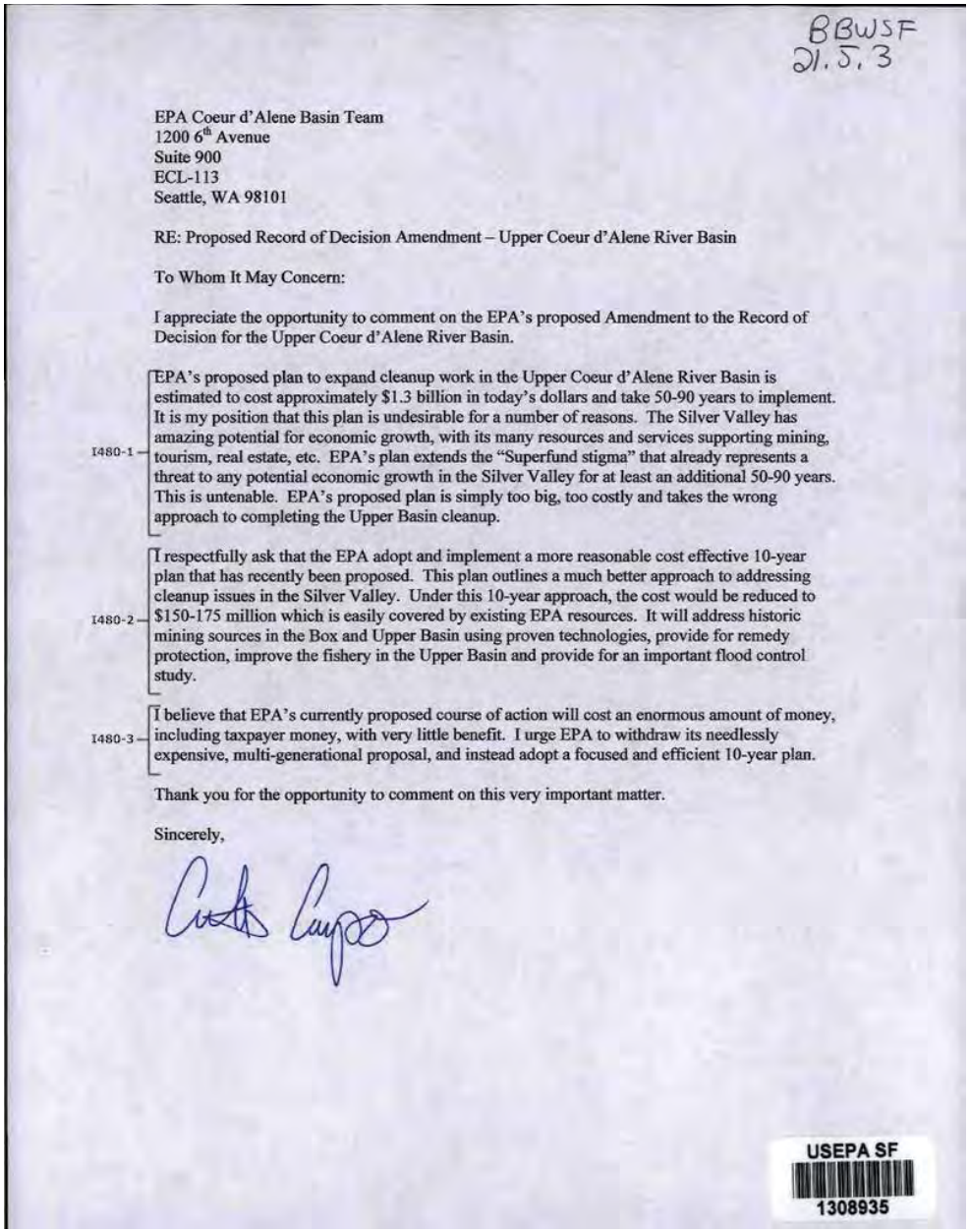
From: JIM CULLINANE
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I576-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: jim.cullinane@dsiunderground.com
Mailing Address: 3900 W 700 South|Salt Lake City|UT|84104|US
Phone Number: (775) 247-7296

617757

Response to comment I576-1

See response to Comment No. I351-1.

Cupo, Curtis, I480, Letter 1308935



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I480-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I480-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I480-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Curtis Cupo

USEPA SF
1308935

Response to comment I480-1
See response to Comment No. I474-1.

Response to comment I480-2
See response to Comment No. I474-2.

Response to comment I480-3
See response to Comment No. I474-3.

Currie, Rick, I254, Letter 616015-14

Rick Currie:

I254-1 — My sole purpose to come here tonight is to lobby for an extension and looks like that's going to be granted. So first off, I would like to comment on Senator Risch's comments. That should be played a few more times so everybody gets the message. He was spot on. Other than that, I would – I ask that EPA not only give the people the time needed to critique the plan but truly listen to what people have to say. Thank you. — I254-2

John Magnuson: Senator Crapo and members of the head table, my name is John Magnuson and my family has had the privilege to call the Silver Valley our home for as long as Idaho has been a state. We are a proud community, a community rich in mining tradition yet we are community that has produced far more than that. We have produced people of character, integrity with a love for this state and a love for this region that goes as deep as anyone else in the country. We did saw many instances against the federal headwind that would have scattered lesser communities through the sands of time. I say that so the EPA can understand the perspective from which we come when we view this plan as skepticism. The federal government declared martial law over our ancestors. The federal government in some instances actively directed mining operations during World War II yet when the Superfund site designation came about, that fact was ignored and not addressed. In 1991, on a lazy summer Sunday, the federal government sent us the largest FBI delegation in West Coast history and in the 1980s, the [EPA] effectively kicked a community already down on its luck by declaring a federal Superfund site all but hoping – halting any hope of economic recovery or development. That cleanup, merging completion of perceived human health risk having been fully addressed, what do we face now? We face a federal headwind stronger than any other. Call it for what it is. It is an unnecessary plan. It is an unwelcome plan. It's an unwanted plan. It needs adequate time for analysis. It needs adequate time for comment. It needs parameters. It needs limitations. It needs limitations, scope in time and money. More importantly, it needs to reflect the wishes of this community. To preserve this community's chances for economic self-determination and survival and 100-year stigmatization is not the answer. We need

Clearwire—Lower Cost, More Convenient Communications
Page 19 of 45

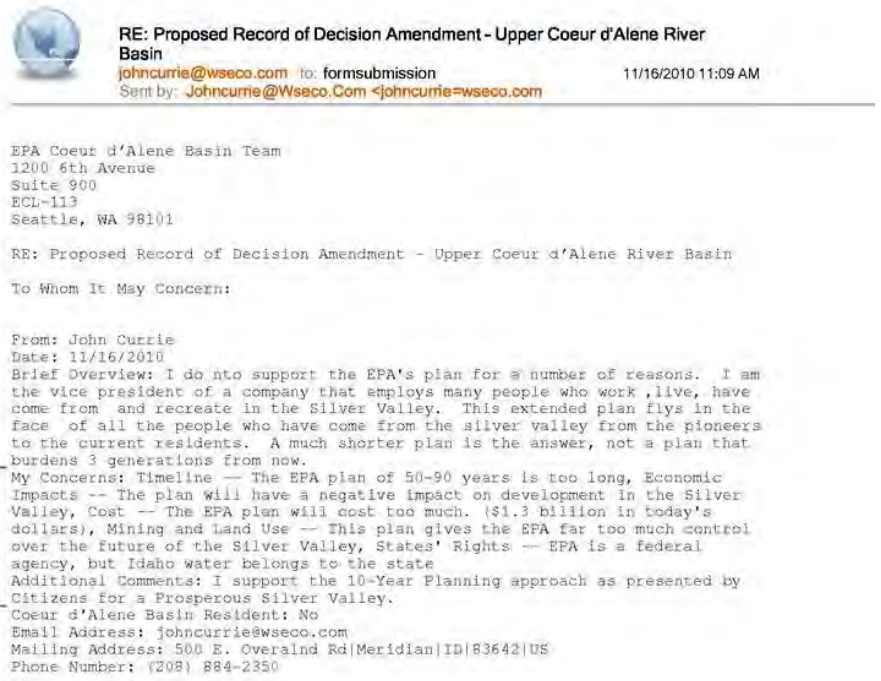
Response to comment I254-1

See response to Comment No. I54-6.

Response to comment I254-2

See response to Comment No. I54-6.

Currie, John, I368, Letter 616255



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
johncurrie@wseco.com to: formsubmission 11/16/2010 11:09 AM
Sent by: Johncurrie@Wseco.Com <johncurrie=wseco.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

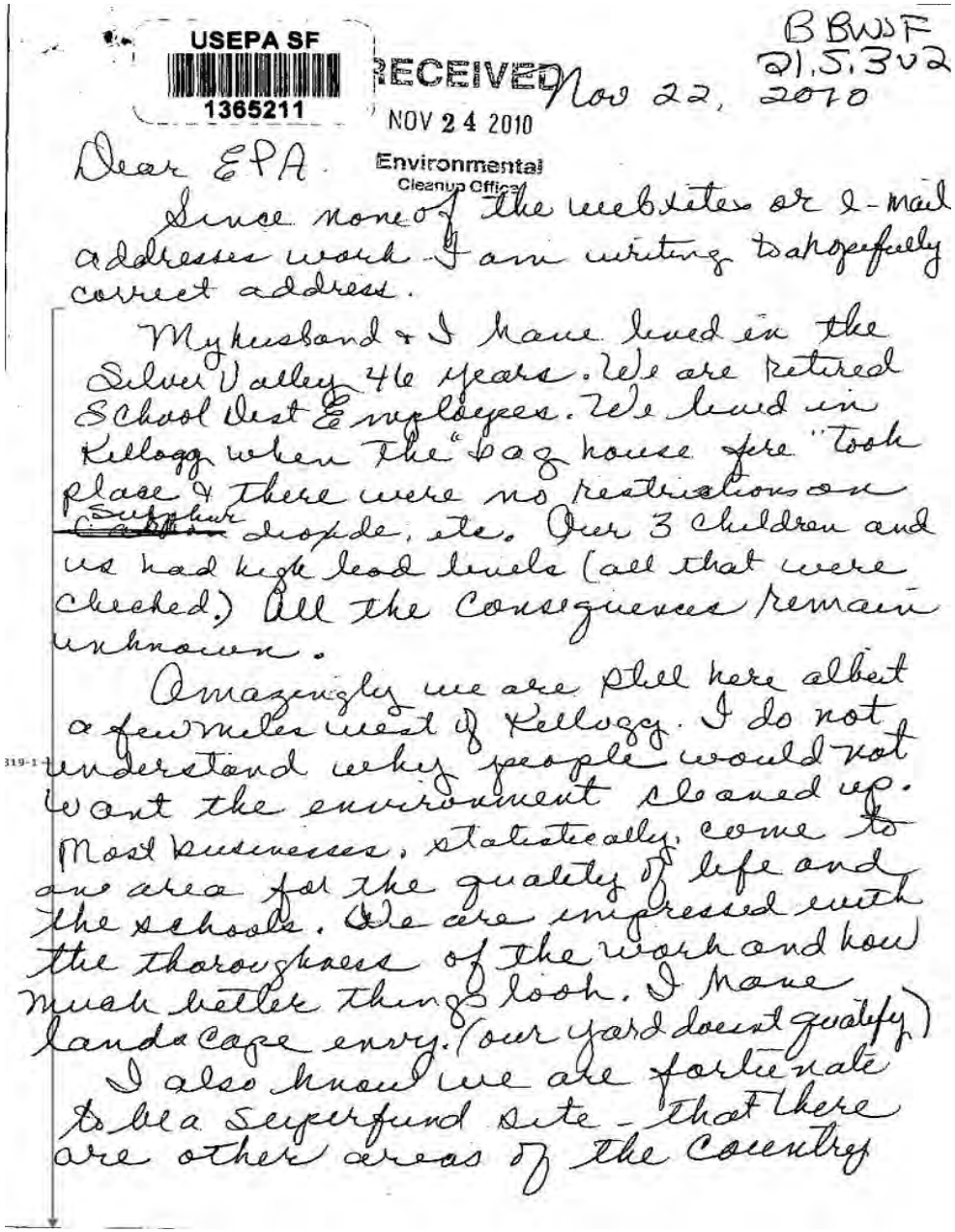
From: John Currie
Date: 11/16/2010
Brief Overview: I do nto support the EPA's plan for a number of reasons. I am the vice president of a company that employs many people who work ,live, have come from and recreate in the Silver Valley. This extended plan flys in the face of all the people who have come from the silver valley from the pioneers to the current residents. A much shorter plan is the answer, not a plan that burdens 3 generations from now.
I368-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: johncurrie@wseco.com
Mailing Address: 500 E. Overalnd Rd|Meridian|ID|83642|US
Phone Number: (208) 884-2350

616255

Response to comment I368-1

See response to Comment No. I351-1.

Curry, Ann, I819, Letter 1365211



USEPA SF
1365211

RECEIVED
NOV 24 2010
Environmental
Cleanup Office

B BWSF
21.5.3v2

Nov 22, 2010

Dear EPA.

Since none of the websites or e-mail addresses work I am writing to a hopefully correct address.

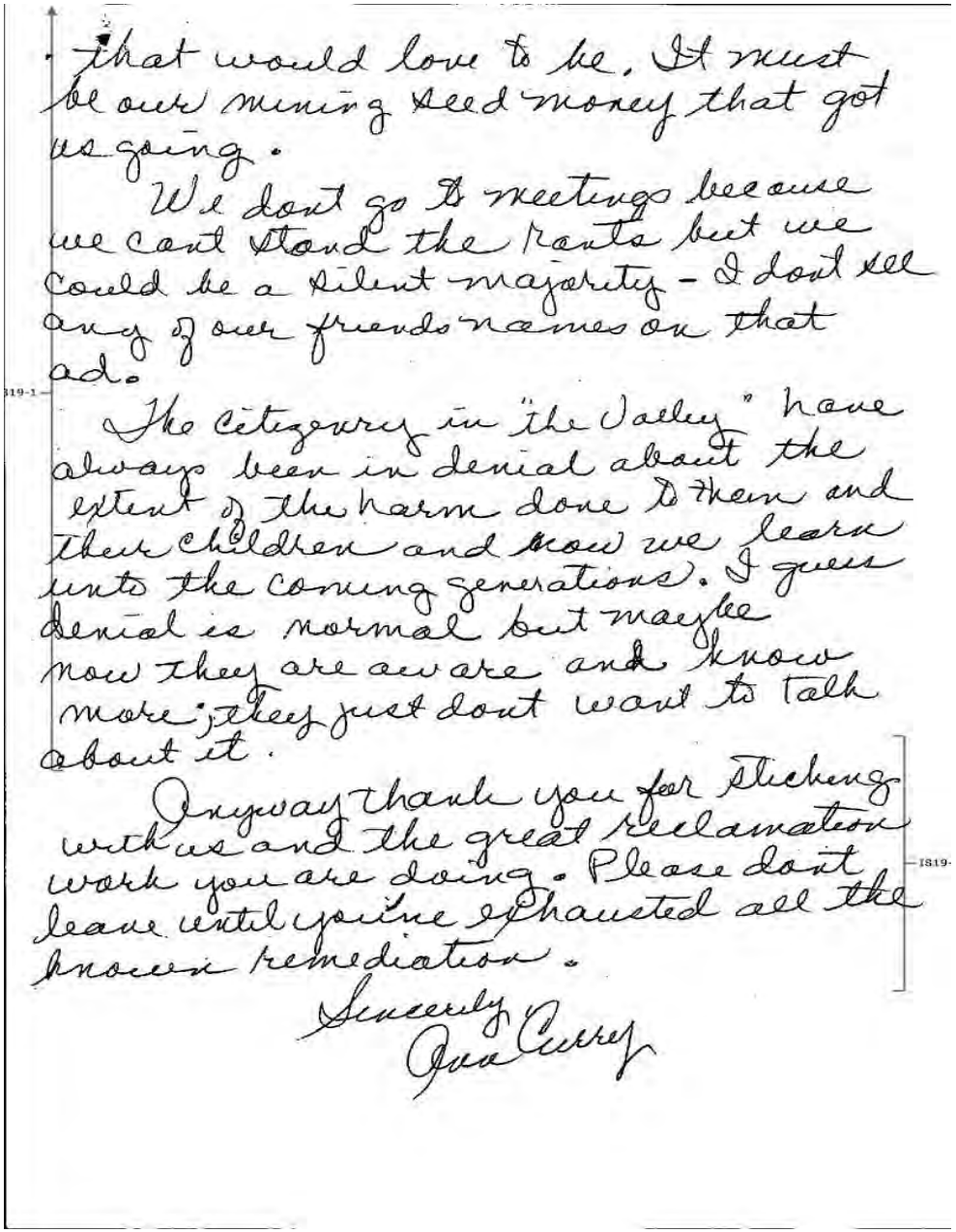
My husband & I have lived in the Silver Valley 46 years. We are retired School Dist Employees. We lived in Kellogg when the "bag house fire" took place & there were no restrictions on ~~Sulphur~~ dioxide, etc. Our 3 children and us had high lead levels (all that were checked.) All the consequences remain unknown.

Amazingly we are still here albeit a few miles west of Kellogg. I do not understand why people would not want the environment cleaned up. Most businesses, statistically, come to our area for the quality of life and the schools. We are impressed with the thoroughness of the work and how much better things look. I have landscape envy. (our yard doesn't qualify)

I also know we are fortunate to be a Superfund site - that there are other areas of the country

I819-1

Response to comment I819-1
Thank you for your comment.



that would love to be. It must be our mining seed money that got us going.

We dont go to meetings because we cant stand the rants but we could be a silent majority - I dont see any of our friends names on that ad.

I819-1

The citizenry in "the Valley" have always been in denial about the extent of the harm done to them and their children and now we learn unto the coming generations. I guess denial is normal but maybe now they are aware and know more; they just dont want to talk about it.

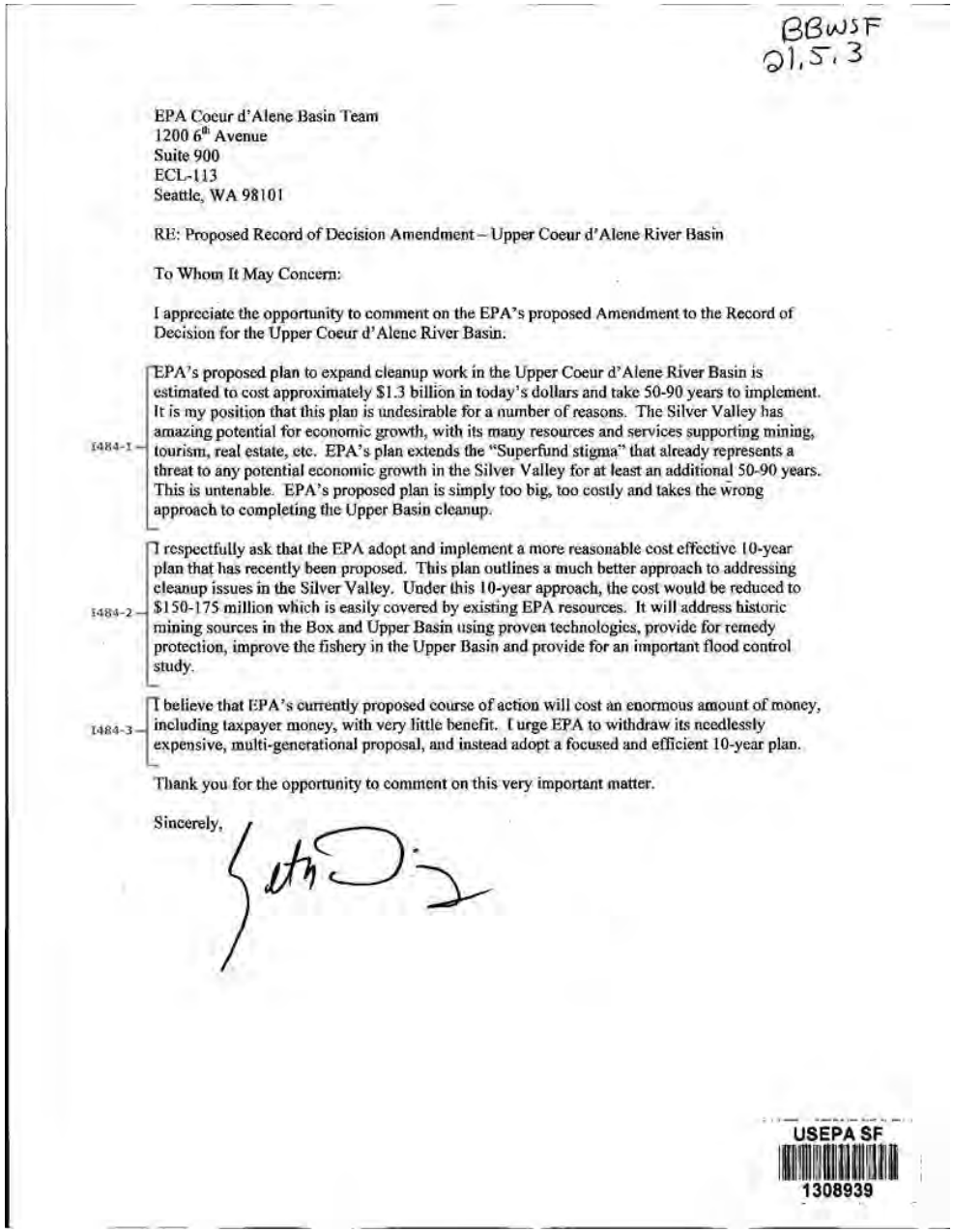
Anyway thank you for sticking with us and the great reclamation work you are doing. Please dont leave until you've exhausted all the known remediation.

I819-2

Sincerely
Joe Currey

Response to comment I819-2
Comment noted and appreciated.

D, Seth, I484, Letter 1308939



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I484-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I484-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I484-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

USEPA SF
1308939

Response to comment I484-1

See response to Comment No. I474-1.

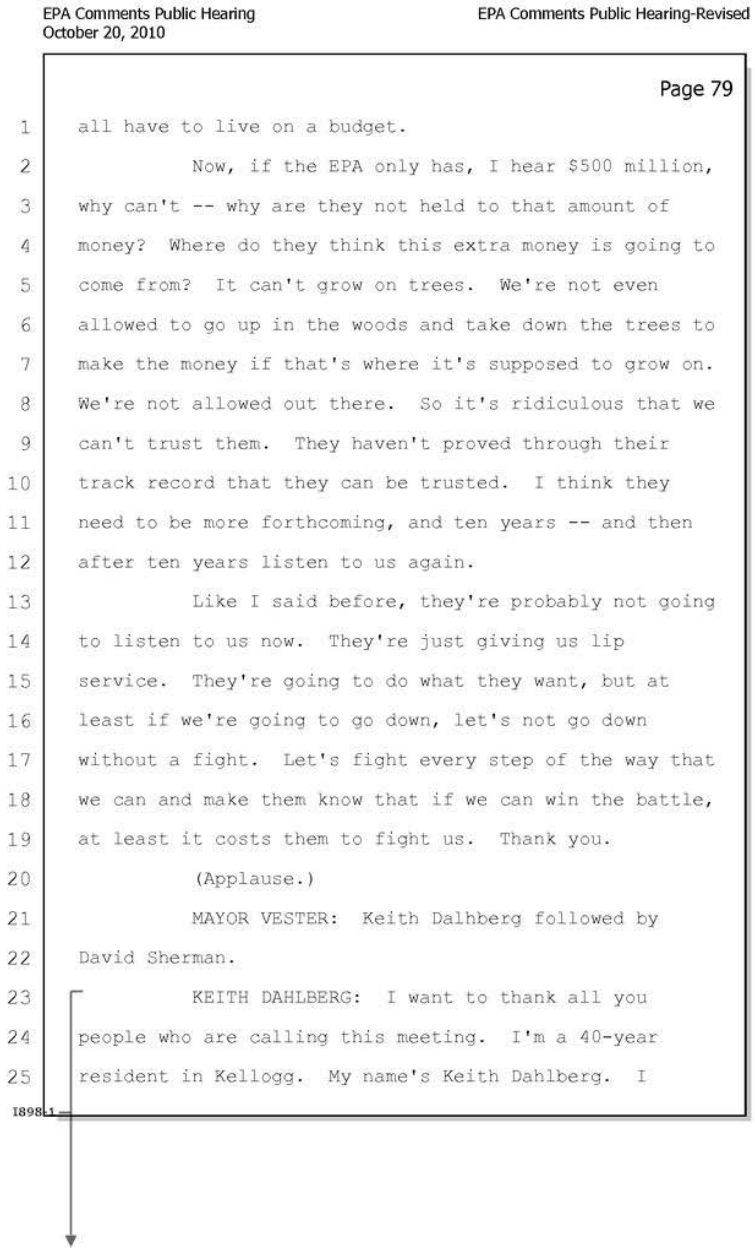
Response to comment I484-2

See response to Comment No. I474-2.

Response to comment I484-3

See response to Comment No. I474-3.

Dahlberg, Katie, I898, Letter 619651-33



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

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all have to live on a budget.

Now, if the EPA only has, I hear $500 million, why can't -- why are they not held to that amount of money? Where do they think this extra money is going to come from? It can't grow on trees. We're not even allowed to go up in the woods and take down the trees to make the money if that's where it's supposed to grow on. We're not allowed out there. So it's ridiculous that we can't trust them. They haven't proved through their track record that they can be trusted. I think they need to be more forthcoming, and ten years -- and then after ten years listen to us again.

Like I said before, they're probably not going to listen to us now. They're just giving us lip service. They're going to do what they want, but at least if we're going to go down, let's not go down without a fight. Let's fight every step of the way that we can and make them know that if we can win the battle, at least it costs them to fight us. Thank you.

(Applause.)

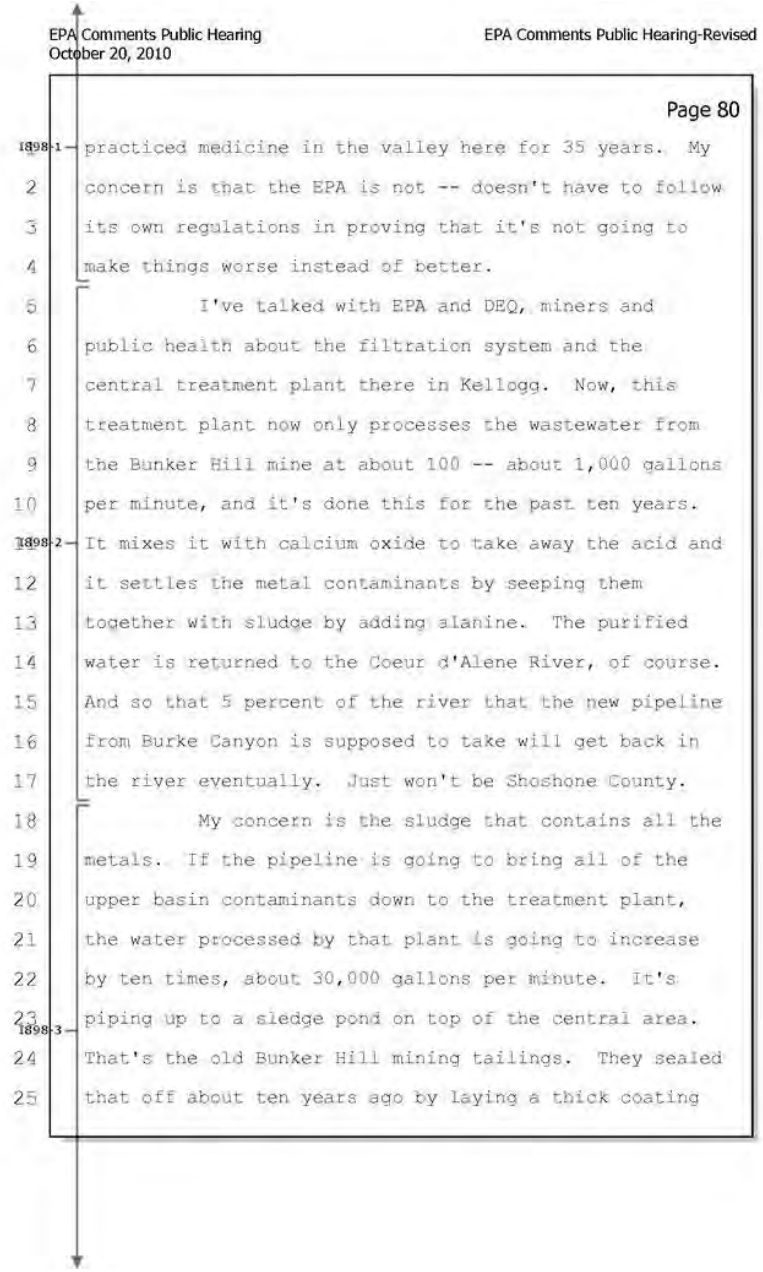
MAYOR VESTER: Keith Dalhberg followed by David Sherman.

KEITH DAHLBERG: I want to thank all you people who are calling this meeting. I'm a 40-year resident in Kellogg. My name's Keith Dahlberg. I

I898-1

Response to comment I898-1

Comment noted.



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October 20, 2010

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I898-1 practiced medicine in the valley here for 35 years. My concern is that the EPA is not -- doesn't have to follow its own regulations in proving that it's not going to make things worse instead of better.

I've talked with EPA and DEQ, miners and public health about the filtration system and the central treatment plant there in Kellogg. Now, this treatment plant now only processes the wastewater from the Bunker Hill mine at about 100 -- about 1,000 gallons per minute, and it's done this for the past ten years.

I898-2 It mixes it with calcium oxide to take away the acid and it settles the metal contaminants by seeping them together with sludge by adding alanine. The purified water is returned to the Coeur d'Alene River, of course. And so that 5 percent of the river that the new pipeline from Burke Canyon is supposed to take will get back in the river eventually. Just won't be Shoshone County.

My concern is the sludge that contains all the metals. If the pipeline is going to bring all of the upper basin contaminants down to the treatment plant, the water processed by that plant is going to increase by ten times, about 30,000 gallons per minute. It's

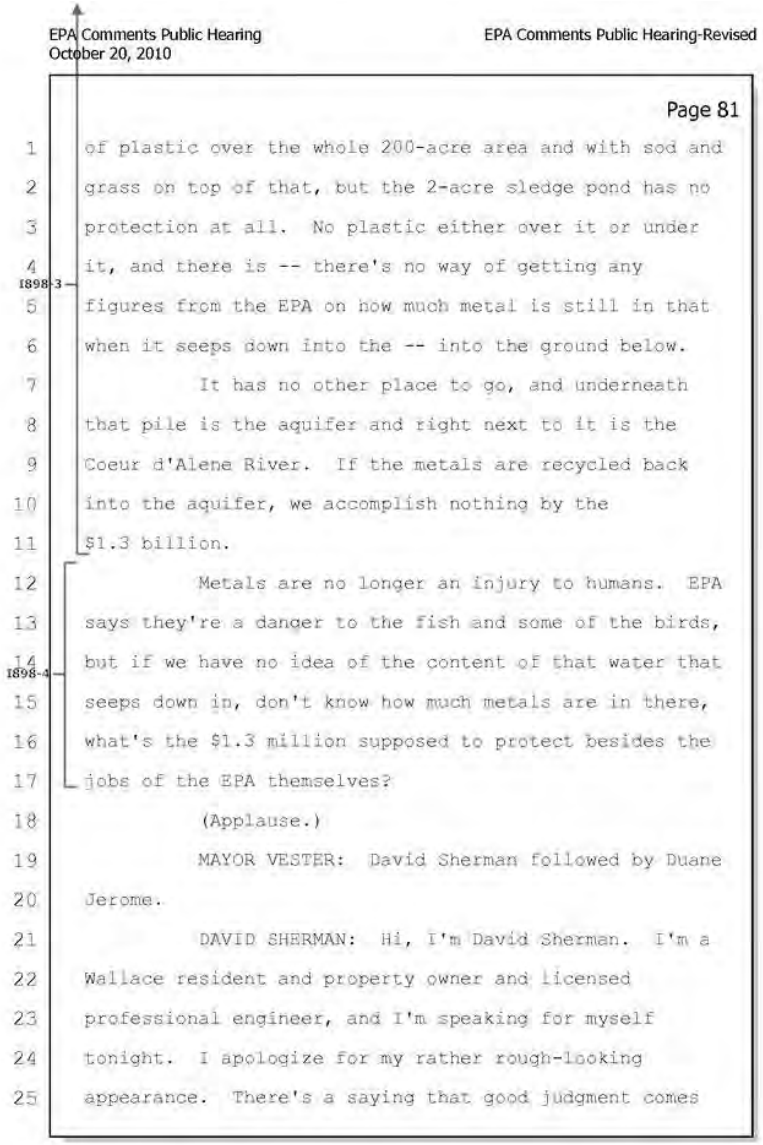
I898-3 piping up to a sledge pond on top of the central area. That's the old Bunker Hill mining tailings. They sealed that off about ten years ago by laying a thick coating

Response to comment I898-2

Water that is treated at the CTP will be returned to the Coeur d'Alene River adjacent to the CTP in Kellogg, which is located within Shoshone County.

Response to comment I898-3

See response to Comment No. I8-2.



EPA Comments Public Hearing
October 20, 2010

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of plastic over the whole 200-acre area and with sod and grass on top of that, but the 2-acre sledge pond has no protection at all. No plastic either over it or under it, and there is -- there's no way of getting any I898-3 figures from the EPA on how much metal is still in that when it seeps down into the -- into the ground below.

It has no other place to go, and underneath that pile is the aquifer and right next to it is the Coeur d'Alene River. If the metals are recycled back into the aquifer, we accomplish nothing by the $1.3 billion.

Metals are no longer an injury to humans. EPA says they're a danger to the fish and some of the birds, but if we have no idea of the content of that water that I898-4 seeps down in, don't know how much metals are in there, what's the $1.3 million supposed to protect besides the jobs of the EPA themselves?

(Applause.)

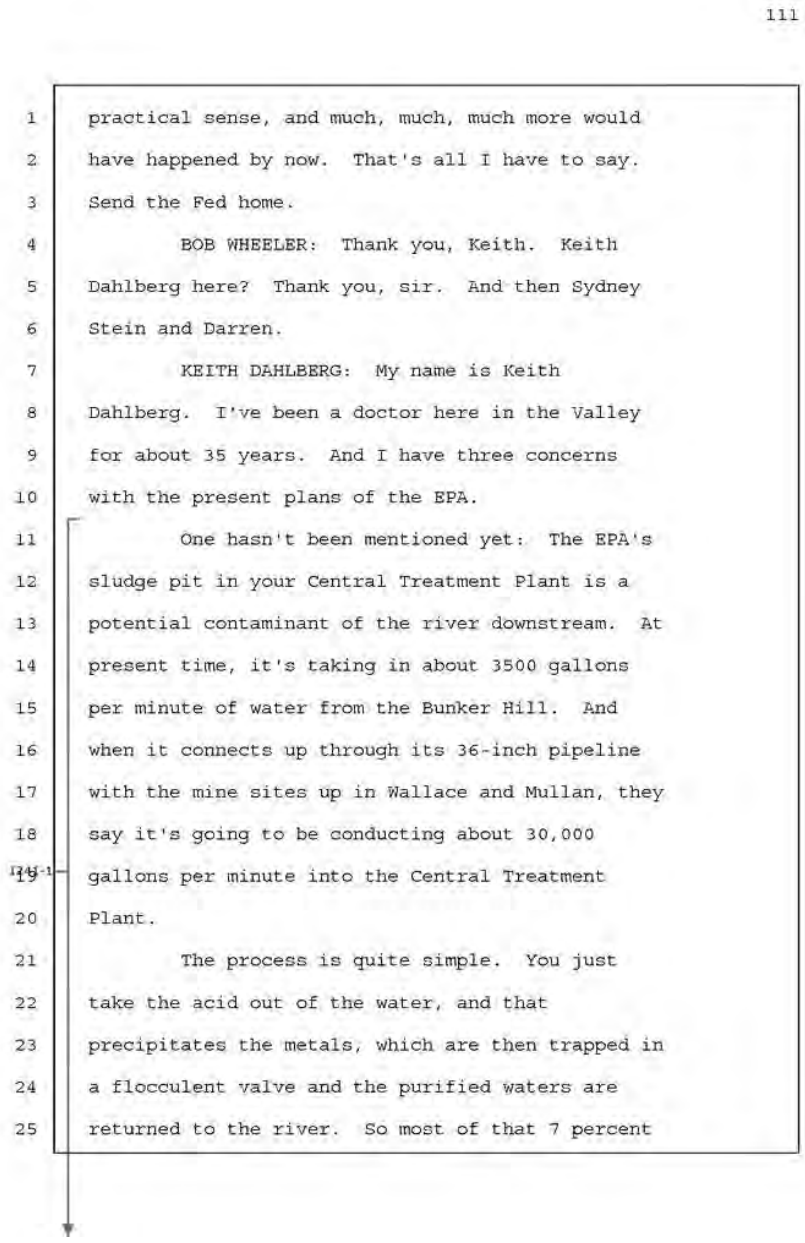
MAYOR VESTER: David Sherman followed by Duane Jerome.

DAVID SHERMAN: Hi, I'm David Sherman. I'm a Wallace resident and property owner and licensed professional engineer, and I'm speaking for myself tonight. I apologize for my rather rough-looking appearance. There's a saying that good judgment comes

Response to comment I898-4

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediment, groundwater, and surface water that poses risks to people, wildlife, and the environment. The levels of contamination significantly exceed acceptable state and site-specific water quality 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 Upper Basin. There is substantial documentation of the contamination levels and risks posed.

Dahlberg, Keith, I241, Letter 610097-36



111

practical sense, and much, much, much more would have happened by now. That's all I have to say. Send the Fed home.

BOB WHEELER: Thank you, Keith. Keith Dahlberg here? Thank you, sir. And then Sydney Stein and Darren.

KEITH DAHLBERG: My name is Keith Dahlberg. I've been a doctor here in the Valley for about 35 years. And I have three concerns with the present plans of the EPA.

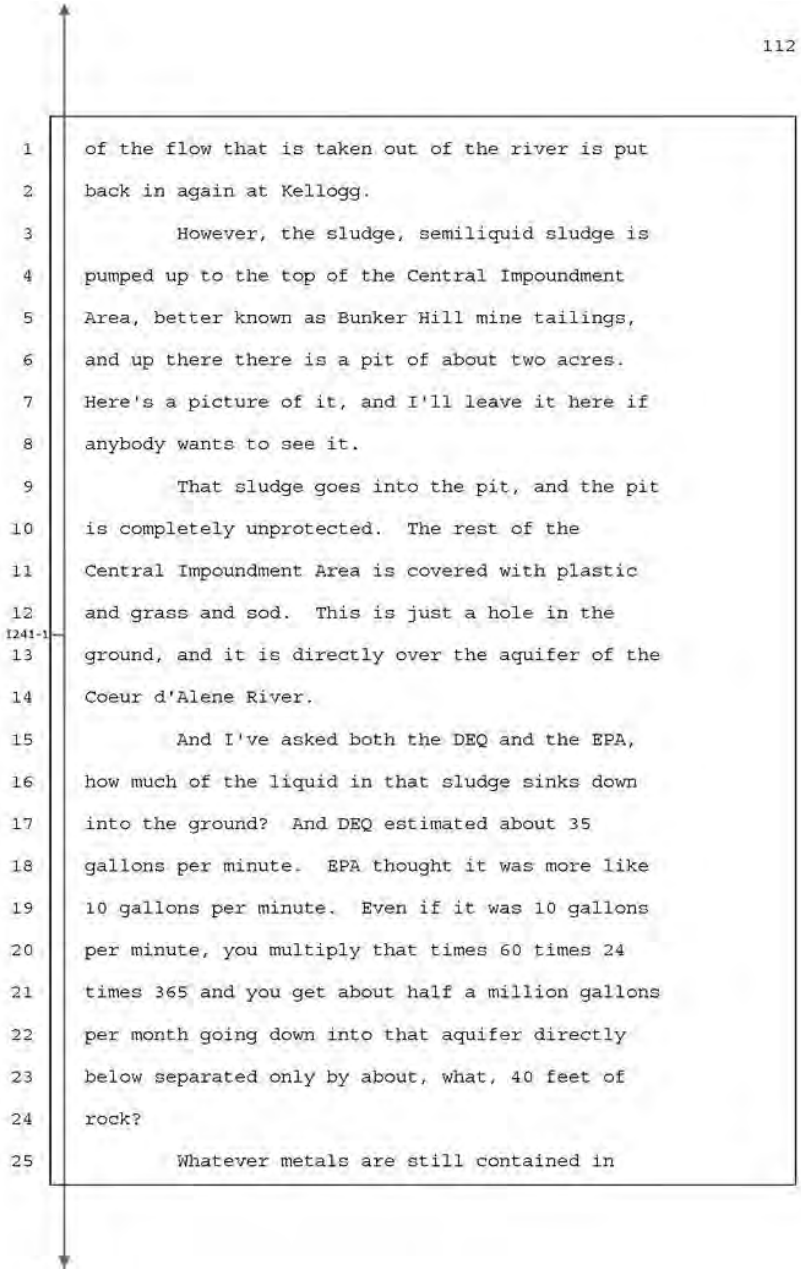
One hasn't been mentioned yet: The EPA's sludge pit in your Central Treatment Plant is a potential contaminant of the river downstream. At present time, it's taking in about 3500 gallons per minute of water from the Bunker Hill. And when it connects up through its 36-inch pipeline with the mine sites up in Wallace and Mullan, they say it's going to be conducting about 30,000 gallons per minute into the Central Treatment Plant.

I241-1

The process is quite simple. You just take the acid out of the water, and that precipitates the metals, which are then trapped in a flocculent valve and the purified waters are returned to the river. So most of that 7 percent

Response to comment I241-1

See response to Comment No. I8-2.



112

of the flow that is taken out of the river is put back in again at Kellogg.

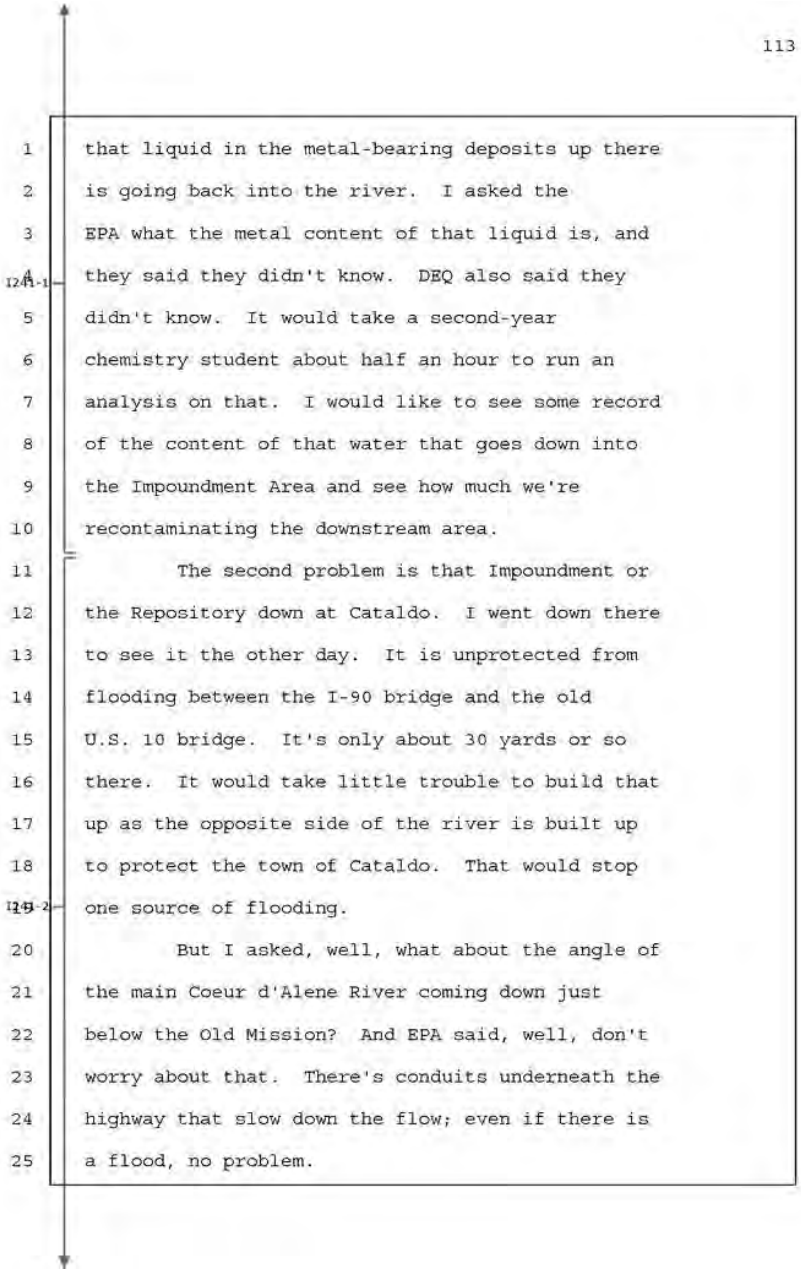
However, the sludge, semiliquid sludge is pumped up to the top of the Central Impoundment Area, better known as Bunker Hill mine tailings, and up there there is a pit of about two acres. Here's a picture of it, and I'll leave it here if anybody wants to see it.

That sludge goes into the pit, and the pit is completely unprotected. The rest of the Central Impoundment Area is covered with plastic and grass and sod. This is just a hole in the ground, and it is directly over the aquifer of the Coeur d'Alene River. I241-1

And I've asked both the DEQ and the EPA, how much of the liquid in that sludge sinks down into the ground? And DEQ estimated about 35 gallons per minute. EPA thought it was more like 10 gallons per minute. Even if it was 10 gallons per minute, you multiply that times 60 times 24 times 365 and you get about half a million gallons per month going down into that aquifer directly below separated only by about, what, 40 feet of rock?

Whatever metals are still contained in

No comments



113

that liquid in the metal-bearing deposits up there is going back into the river. I asked the EPA what the metal content of that liquid is, and they said they didn't know. DEQ also said they didn't know. It would take a second-year chemistry student about half an hour to run an analysis on that. I would like to see some record of the content of that water that goes down into the Impoundment Area and see how much we're recontaminating the downstream area.

I241-1

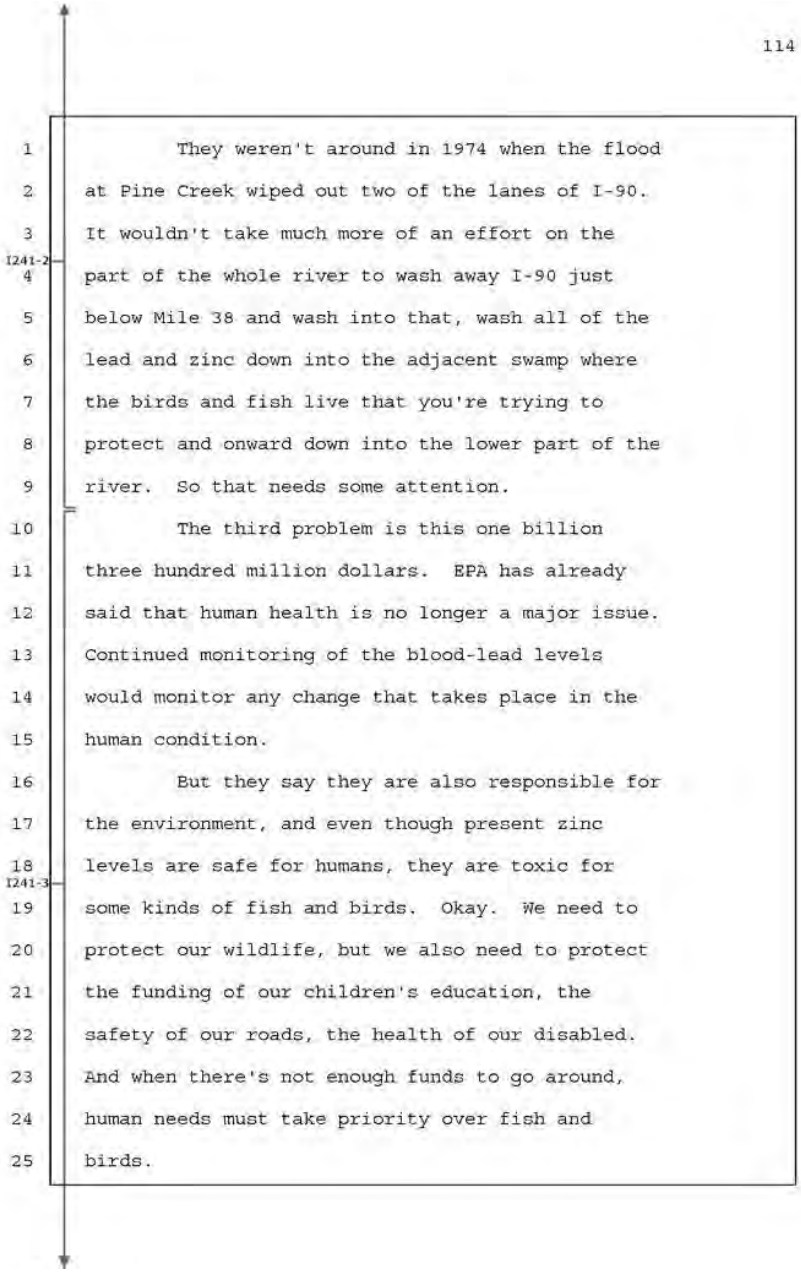
The second problem is that Impoundment or the Repository down at Cataldo. I went down there to see it the other day. It is unprotected from flooding between the I-90 bridge and the old U.S. 10 bridge. It's only about 30 yards or so there. It would take little trouble to build that up as the opposite side of the river is built up to protect the town of Cataldo. That would stop one source of flooding.

I241-2

But I asked, well, what about the angle of the main Coeur d'Alene River coming down just below the Old Mission? And EPA said, well, don't worry about that. There's conduits underneath the highway that slow down the flow; even if there is a flood, no problem.

Response to comment I241-2

See response to Comment No. LC21-9.



114

They weren't around in 1974 when the flood at Pine Creek wiped out two of the lanes of I-90. It wouldn't take much more of an effort on the part of the whole river to wash away I-90 just below Mile 38 and wash into that, wash all of the lead and zinc down into the adjacent swamp where the birds and fish live that you're trying to protect and onward down into the lower part of the river. So that needs some attention.

I241-2

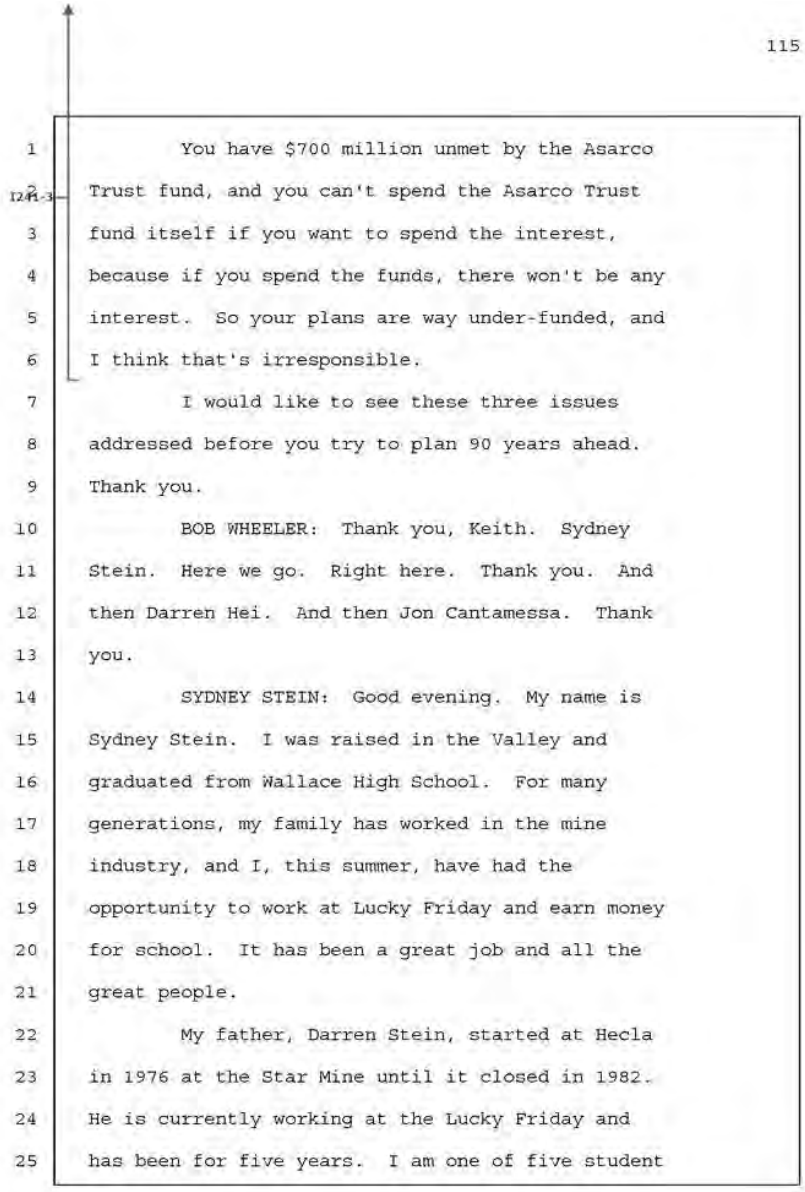
The third problem is this one billion three hundred million dollars. EPA has already said that human health is no longer a major issue. Continued monitoring of the blood-lead levels would monitor any change that takes place in the human condition.

But they say they are also responsible for the environment, and even though present zinc levels are safe for humans, they are toxic for some kinds of fish and birds. Okay. We need to protect our wildlife, but we also need to protect the funding of our children's education, the safety of our roads, the health of our disabled. And when there's not enough funds to go around, human needs must take priority over fish and birds.

I241-3

Response to comment I241-3

See response to Comment No. I58-2.



115

You have $700 million unmet by the Asarco Trust fund, and you can't spend the Asarco Trust fund itself if you want to spend the interest, because if you spend the funds, there won't be any interest. So your plans are way under-funded, and I think that's irresponsible.

I would like to see these three issues addressed before you try to plan 90 years ahead. Thank you.

BOB WHEELER: Thank you, Keith. Sydney Stein. Here we go. Right here. Thank you. And then Darren Hei. And then Jon Cantamessa. Thank you.

SYDNEY STEIN: Good evening. My name is Sydney Stein. I was raised in the Valley and graduated from Wallace High School. For many generations, my family has worked in the mine industry, and I, this summer, have had the opportunity to work at Lucky Friday and earn money for school. It has been a great job and all the great people.

My father, Darren Stein, started at Hecla in 1976 at the Star Mine until it closed in 1982. He is currently working at the Lucky Friday and has been for five years. I am one of five student

No comments

Dahlberg, Keith, I577, Letter 617758

cda basin ROD
dahlberg
to:
CDABasin
11/18/2010 02:12 PM
Cc:
Anne Dailey, "Dennis Adams", Bill, Anne McCauley, Ed Moreen, larry
Show Details

I577-1 I am Keith Dahlberg, a 35-year resident and practicing physician (M.D.) in the Silver Valley. I appreciate what EPA and DEQ have done in cleaning up the sources of lead pollution in Shoshone County over the past four decades. I note that now, with rare exceptions, lead toxicity is no more prevalent here than in the rest of USA. EPA in its own statements acknowledges this, and says the problem now is the environment, where metal levels, zinc in particular, are still toxic to certain species of fish, birds, and/or wild animals (which ones?) even though safe for humans.

I577-2 While I am in favor of preserving wildlife, I have difficulty justifying spending over a billion dollars for it when it means taking more than half of the funding from far more pressing human needs in Idaho like improving human health, primary education, or long-overdue infrastructure repairs. Even major threats to wildlife would scarcely justify your proposed ROD's scope; zinc overload in some fish's liver doesn't qualify, especially when your plan appears to do nothing more than concentrate metallic toxins from the whole watershed and deposit them precisely over the aquifer at the central treatment plant.

I577-3 Mr. Moreen dismissed the danger of dumping toxic waste into the CIA sludge pond by saying that the whole Central Impoundment Area has been covered by an impermeable layer of plastic. He surely must know that the two-acre sludge pond has no plastic barrier separating it from the aquifer directly underneath. ALL of the sludge from the Treatment Plant goes into that pond, and the DEQ and EPA estimates of the liquid portion seeping downward toward the aquifer vary between 10 and 35 gallons per minute. Since the treatment plant operates nearly 24/7, that means that at least four million gallons a year, for the last ten years, is contaminating the site. And if the ROD calls for increasing the plant intake by ten-fold from the soon-to-be-piped water from the upper basin, you are only increasing the danger of dumping an unknown portion of the county's pollutants back into the river's aquifer, upstream from the very wildlife you are trying to protect.

It is ridiculous, Mr. Adams, to suppose that 15,000 gallons of supernatant liquid per day just disappears without a trace, as you claimed at a recent EPA public meeting. That daily quantity won't just evaporate. And your wells around the CIA are dry because the fluid doesn't need to go sideways to reach the flowing aquifer. As far as I can tell, using high-power binoculars, you have no well pipes closer than 200 yards from the sludge pond.

In sum, you do not know how much sludge liquid penetrates into the aquifer, nor do you know how

617758

Response to comment I577-1

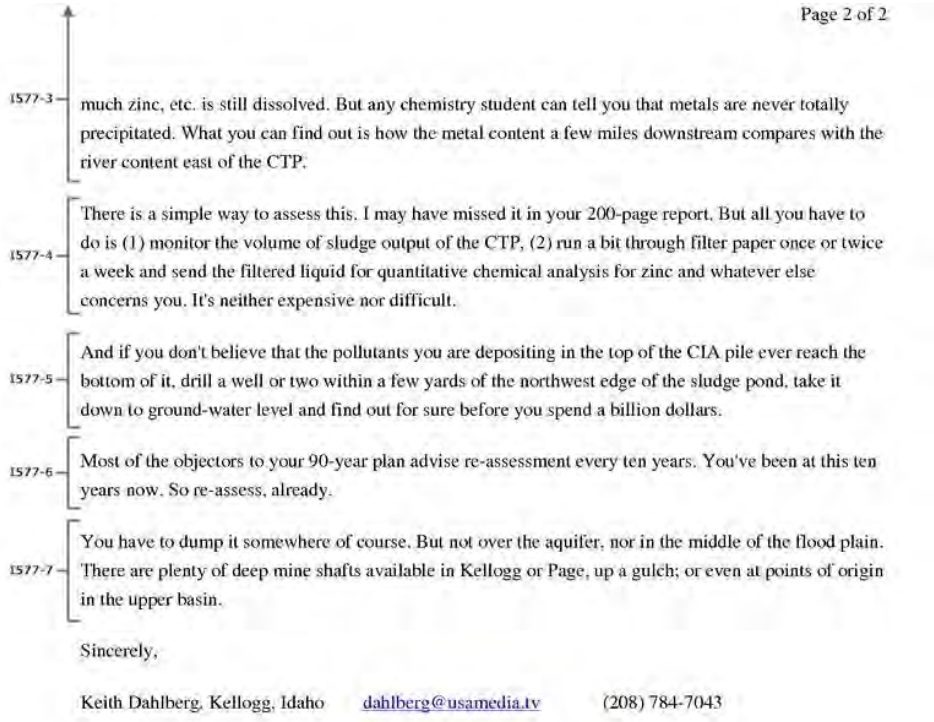
Thank you for your comment. Regarding human health risks, see response to Comment No. I295-1.

Response to comment I577-2

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I577-3

EPA placed a plastic cover (high-density polyethelene) over the entire surface of the Central Impoundment Area (CIA) about a decade ago to cut off the infiltration from precipitation into the approximate 230 Acre surface area. Since that cover installation the wells in the CIA cell have all dried up, indicating that there is no groundwater buildup in the CIA. These same monitoring wells contained water until a few years after installation of the cover. Recognizing that fact, the average amount of water that dewaters from the sludge is on the order of 9 gals per minute. That would equate to less than 2 five gallon buckets over a large area of over 5 acres. Imagine filling up 2 five gallon bucket twice in a minute and pouring it over a large surface, it would not amount to much moisture, which is one of the reasons why we don't see any water in the ground water wells in the CIA. The existing sludge pond is nearing capacity and will be closed with an impermeable membrane cover, similar to the rest of the CIA to preclude infiltration. With regard to impacts to groundwater in the vicinity of the CIA, EPA monitors impacts from a range of sources including from the CIA itself. Monitoring of the groundwater near the CIA has demonstrated that the waste material associated with the CIA is stable and no longer significantly contributing to the groundwater in the area.



Page 2 of 2

I577-3 much zinc, etc. is still dissolved. But any chemistry student can tell you that metals are never totally precipitated. What you can find out is how the metal content a few miles downstream compares with the river content east of the CTP.

I577-4 There is a simple way to assess this. I may have missed it in your 200-page report. But all you have to do is (1) monitor the volume of sludge output of the CTP, (2) run a bit through filter paper once or twice a week and send the filtered liquid for quantitative chemical analysis for zinc and whatever else concerns you. It's neither expensive nor difficult.

I577-5 And if you don't believe that the pollutants you are depositing in the top of the CIA pile ever reach the bottom of it, drill a well or two within a few yards of the northwest edge of the sludge pond, take it down to ground-water level and find out for sure before you spend a billion dollars.

I577-6 Most of the objectors to your 90-year plan advise re-assessment every ten years. You've been at this ten years now. So re-assess, already.

I577-7 You have to dump it somewhere of course. But not over the aquifer, nor in the middle of the flood plain. There are plenty of deep mine shafts available in Kellogg or Page, up a gulch; or even at points of origin in the upper basin.

Sincerely,

Keith Dahlberg, Kellogg, Idaho dahlberg@usamedia.tv (208) 784-7043

Response to comment I577-4

See response to comment I577-3 above.

Response to comment I577-5

The Central Impoundment Area (CIA) was closed in 2000 with an impermeable cap. Monitoring of the groundwater near the CIA has demonstrated that the waste material contained in the CIA is stable and no longer contributing to the groundwater in the area. The CIA remedy has successfully prevented direct contact with contaminated materials and minimized infiltration through the contaminated materials. EPA will conduct site-specific designs for all remedial actions prior to implementation. As needed to support remedial designs, such as the in the Bunker Hill Box area, EPA will conduct additional sampling and may conduct pilot tests.

Response to comment I577-6

See responses to Comment Nos. I58-4 and LJ11-2.

Response to comment I577-7

See response to Comment No. I54-3.

Dahlberg, Keith, I8, Letter 896731

August 4 meeting
dahlberg
to:
CDABasin
08/02/2010 11:21 AM
Show Details

re: EPA Public Meeting August 4:

I8-1 I hope EPA folks will give a concise plain English explanation of their plans this time around. Your website http://www.epa.gov/region10/pdf/sites/bunker_hill/roda_faq_072910.pdf (eight pages instead of 2,000) gives readers clearer answers.

That said, I still see three major problems: (1) contamination of the aquifer from the EPA sludge pit at their Central Treatment Plant [CPT], (2) their puzzling placement of a contaminated-soil repository in the Cataldo flood plain, and (3) EPA's 1.3 billion dollar underfunded cost.

I8-2 (1) The CPT inflow averages 1,300 gallons per minute [gpm] flow, averaging about 172 parts per million [ppm] dissolved zinc, and lesser amounts of arsenic, cadmium, lead, and other elements. The plant de-acidifies the intake water with calcium oxide, trapping and precipitating the metals in a sludge of "flocculent" (mostly alum). The purified water returns to the river, but the sludge is pumped to a several-acre pit on top of the Central Impoundment Area [CIA], the old Bunker tailings pile.

The 200-acre CIA has been covered and sealed under heavy plastic and overlain by clean soil and grass for ten years now, *except* for that sludge pit. The pit has no protection against seepage into the underlying alluvial plain and aquifer. Seeping from the sludge is estimated variously at 35 gpm (by DEQ) or 9 gpm (by EPA) but the sludge is the concentrate of the whole CTP output. And if all the Upper Basin mine flows are piped to the CTP, the intake will increase from 1,300 gpm to 33,000 gpm. Probably less contaminated than the Bunker Hill water, but even 10 gallons per minute seepage equals five million gallons per year, directly over the aquifer. What is the toxic metal content of this re-pollution? EPA says it doesn't know. Why are you waiting five or more years from now until the present pit is full before building a new, protected, plastic-lined pit?

I8-3 (2) The Cataldo contaminated-soil repository, adjacent to the Mission Swamp, is vulnerable to flooding from upstream (between the I-90 bridge and the Canyon Road Bridge) or by a washout of I-90 at the river bend near milepost 38. The 1974 Pine Creek flood took out both eastbound lanes of I-90. So far,the full effect of a combined North and South Fork flood has never been tested. It would be a simple operation to protect the righthand bank of the river in the few yards between the two bridges, as has been on the left bank. But what was EPA's reasoning, placing a repository there as a first choice? A major flood will recontaminate everything downstream all over again, and there goes your billion dollar wildlife protection.

I8-4 (3) Cost. One billion three hundred million dollars.. EPA has already said human health is no longer a major issue. Continued monitoring of local blood lead levels would monitor any change. But you say you are also responsible for the environment, and even though present zinc levels are safe for humans, they are toxic for some kinds of fish and birds. Okay, we need to protect wildlife, but we also need to protect the funding of our children's education, the safety of our roads, the health of the disabled, etc. And when there aren't enough funds to go around, human needs must take priority.

EPA needs to go back to the drawing board. The Asarco Trust fund can't finance their present plans. And neither can Idaho tax payers.

Keith Dahlberg, Kellogg (208) 784-7043 dahlberg@usamedia.tv

896731

Response to comment I8-1

With regard to contamination of the aquifer see response to Comment No. I577-3. With regard to the East Mission Flats Repository, please see response to Comment No. LC21-9. Regarding estimated costs of the Selected Remedy, see response to Comment No. I58-2.

Response to comment I8-2

The infiltration rate of water beneath the sludge pond was estimated by EPA to be 9 gallons per minute (gpm) as noted in the comment and documented in the following report*: Current Status, Conceptual Site Model, Operable Unit 2, Bunker Hill Mining and Metallurgical Complex Superfund Site* (CH2M HILL, 2006). The sludge in the pond is comprised of precipitated metal hydroxides, gypsum, and water. Alum is not used as a treatment reagent (coagulant) at the CTP, and the CTP influent contains relatively little aluminum; thus, the sludge is not "mostly alum" as indicated in the comment. The metals are sequestered in the precipitated solids such that the water that drains from the sludge (and thus the water that infiltrates the CIA) is near the same quality as the CTP effluent. Although this water is clean as it drains from the sludge, it is possible that it could become recontaminated to some degree as it infiltrates through the CIA materials.

Capital costs for construction of a new sludge pond are estimated at $7.33 million dollars, which is estimated to provide 30 years of capacity. Groundwater beneath the CIA currently constitutes one of the largest sources of metals loading to the SFCDR. Given that, the incremental increase in load that would be attributed to the 9 gpm that is estimated to be infiltrating from the sludge pond does not constitute a significant source of metals to groundwater. Because this water is not a significant source of contamination, and because construction of new sludge disposal capacity is so costly, closure of the existing sludge pond at this time would not be the best use of cleanup funds. The existing pond could last five years or more, depending on the implementation rate of the remedy, deferring construction of a replacement pond, as well as saving at least 5 years of capacity.

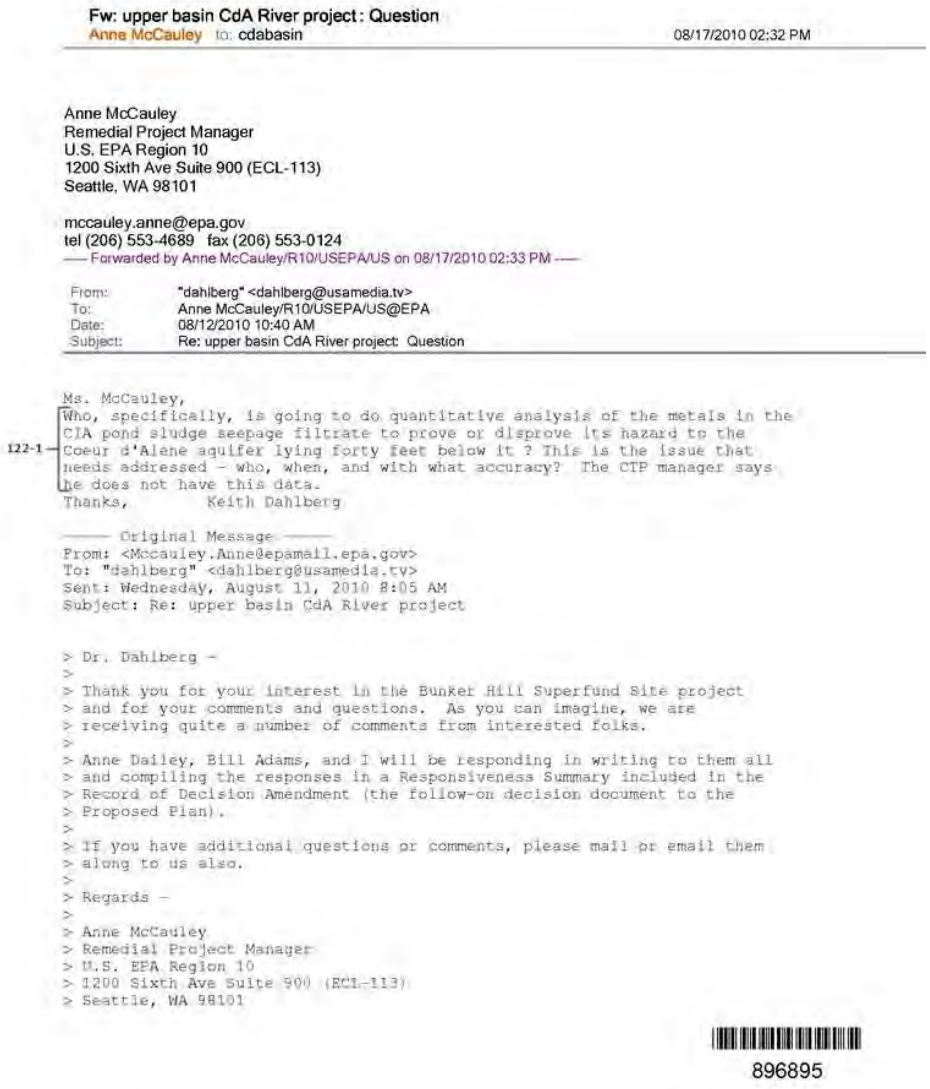
Response to comment I8-3

See response to Comment No. LC21-9.

Response to comment I8-4

See responses to Comment Nos. I58-2 and I527-1.

Dahlberg, Keith, I22, Letter 896895



Fw: upper basin CdA River project: Question
Anne McCauley to: cdabasin 08/17/2010 02:32 PM

Anne McCauley
Remedial Project Manager
U.S. EPA Region 10
1200 Sixth Ave Suite 900 (ECL-113)
Seattle, WA 98101

mccauley.anne@epa.gov
tel (206) 553-4689 fax (206) 553-0124
---- Forwarded by Anne McCauley/R10/USEPA/US on 08/17/2010 02:33 PM ----

From: "dahlberg" <dahlberg@usamedia.tv>
To: Anne McCauley/R10/USEPA/US@EPA
Date: 08/12/2010 10:40 AM
Subject: Re: upper basin CdA River project: Question

Ms. McCauley,
I22-1 Who, specifically, is going to do quantitative analysis of the metals in the CIA pond sludge seepage filtrate to prove or disprove its hazard to the Coeur d'Alene aquifer lying forty feet below it ? This is the issue that needs addressed - who, when, and with what accuracy? The CTP manager says he does not have this data.
Thanks, Keith Dahlberg

----- Original Message -----
From: <Mccauley.Anne@epamail.epa.gov>
To: "dahlberg" <dahlberg@usamedia.tv>
Sent: Wednesday, August 11, 2010 8:05 AM
Subject: Re: upper basin CdA River project

> Dr. Dahlberg -
>
> Thank you for your interest in the Bunker Hill Superfund Site project
> and for your comments and questions. As you can imagine, we are
> receiving quite a number of comments from interested folks.
>
> Anne Dailey, Bill Adams, and I will be responding in writing to them all
> and compiling the responses in a Responsiveness Summary included in the
> Record of Decision Amendment (the follow-on decision document to the
> Proposed Plan).
>
> If you have additional questions or comments, please mail or email them
> along to us also.
>
> Regards -
>
> Anne McCauley
> Remedial Project Manager
> U.S. EPA Region 10
> 1200 Sixth Ave Suite 900 (ECL-113)
> Seattle, WA 98101

896895

Response to comment I22-1

See response to Comment No. I8-2.

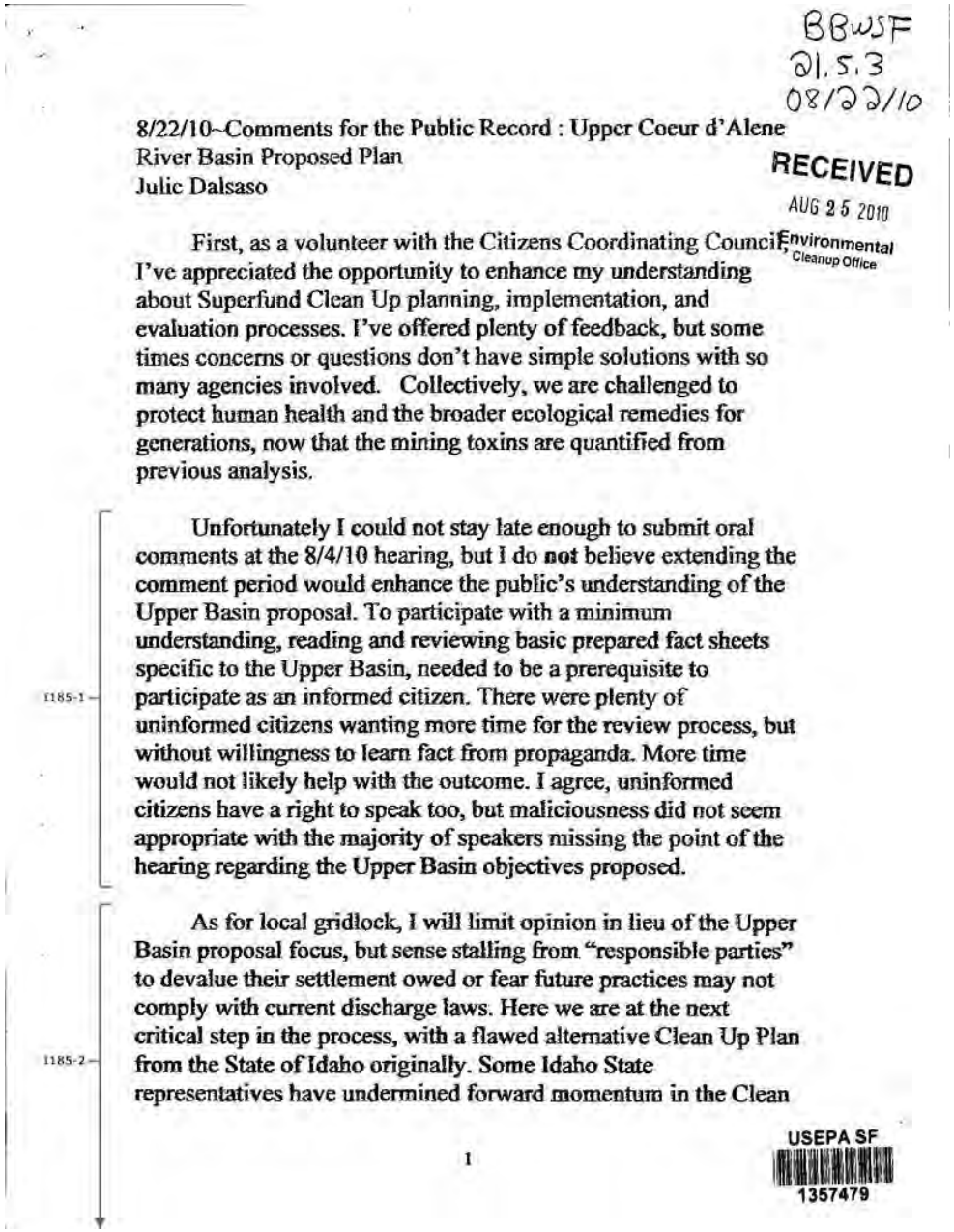
No comments

>
> mccauley.anne@epa.gov
> tel (206) 553-4689 fax (206) 553-0124
>
>
>
> From: "dahlberg" <dahlberg@usamedia.tv>
>
> To: Anne McCauley/R10/USEPA/US@EPA
>
> Date: 08/10/2010 04:41 PM
>
> Subject: upper basin CdA River project
>
>
>
>
>
>
> After the August 4th meeting in Smelterville perhaps you can give me a
> few succinct answers to the issues I raised during audience
> participation. I am a medical doctor with some background in chemistry
> and mineralogy, living in Shoshone county since 1967. After Bunker
> Hillâ?Ts baghouse burned, some of my patients were among those with the
> highest blood lead levels, exceeding 130 nanograms per dl, and. I am
> glad EPA continues to monitor blood leads and has abolished the main
> sources of contamination.
>
>
>
> But, I am concerned about glaringly inconsistent procedures in EPAâ?Ts
> proposed long term plan. I understand the basics of water treatmentâ?"
> raising the pH to precipitate the metals, trapping them in an alum-based
> flocculate, and returning the purified water into the river. But the
> pollutant-containing sludge is pumped into the only unprotected spot on
> top of the CIA. EPA evidently intends to collect metals from the whole
> upper basin and store them directly over the alluvial plain, separated
> from the aquifer below by only thirty feet of old mine tailings. I am
> told by both EPA and IDEQ local people that seepage rate of the liquid
> portion of the deposited sludge is between 9 and 30 gallons per minute
> (gpm) at present operation on only the Bunker Hill mine flow of about
> 1,200 gpm. After the new pipeline, the processed flow will rise to about
> 30,000 gpm.
>
>
> I know that most of the metal pollution will be trapped in the sludge,
> but there will still be a certain amount seeping downward through the
> tailings. Ten to 30 gpm averages about one million gallons of seepage
> each month, ad infinitum. The whole CIA is covered in waterproof plastic
> (except for the 2 or 3 acres of sludge pond, so there will be little
> chance of evaporation. Depending on the particle size of the tailings,
> the pollution plume could be quite narrow, perhaps not registering on
> any test wells (though I understand that Bunker Creek, now carrying the
> purified water from the CTP, is already re-polluted.)
>
>
> My question: What amount (per week, month, or whatever) of metal
> pollutants are being redeposited in the CdA River aquifer lying directly
> below the sludge pit? This should be a simple matter to measure, with
> periodic sampling of the filtrate. Before risking negation of your whole

No comments

> projectâ?Ts goal, I would think that this sampling should have been
> started years ago, but the CTP manager says it has not, and has no idea
> about the amount of metals carried
>
>
> Another question regarding the stability of the CdA River flood plain
> and the Cataldo soil repository: In 1974, a flood in Pine Creek (a small
> tributary of the CdA) took out both eastbound lanes of Interstate 90.
> The Cataldo repository appears vulnerable to a major flood of the
> mainstream Coeur dâ?TAlene at two points: (1) east of the repository in
> the 30 yards or so between the I-90 bridge and the county road (old US
> 10) and (2) where the river bends toward the highway just east of
> Cataldo Mission State Park. One spot is easily fixed, and the other
> event is less likely to occur. But if either should happen, and the
> depository is washed downstream (or even into the marsh adjacent to it,
> home of the birds and fish you are trying to protect) would mean
> starting again from square one for the lower basin. It seems safer to
> relocate the repository.
>
>
> Although a Democrat myself, I agree with Senator Crapo that federal
> funding will not be by the federal government any time soon. The Asarco
> 480 million, if spent, leaves you with no interest for long term
> funding. It's time to go back to the drawing board. Idahoâ?Ts needs are
> for schools, health, roads. etc. before raising any extra 900 milllon to
> improve one fish and bird habitat. I look forward to your reply.
>
>
> With thanks, Keith Dahlberg, MD (retired) dahlberg@usamedia.tv
> (208) 784-7043
>
>

Dalaso, Julie, I185, Letter 1357479



BBWSF
21.5.3
08/22/10

8/22/10~Comments for the Public Record : Upper Coeur d'Alene River Basin Proposed Plan
Julie Dalsaso

RECEIVED
AUG 25 2010
Environmental Cleanup Office

First, as a volunteer with the Citizens Coordinating Council, I've appreciated the opportunity to enhance my understanding about Superfund Clean Up planning, implementation, and evaluation processes. I've offered plenty of feedback, but some times concerns or questions don't have simple solutions with so many agencies involved. Collectively, we are challenged to protect human health and the broader ecological remedies for generations, now that the mining toxins are quantified from previous analysis.

I185-1 Unfortunately I could not stay late enough to submit oral comments at the 8/4/10 hearing, but I do **not** believe extending the comment period would enhance the public's understanding of the Upper Basin proposal. To participate with a minimum understanding, reading and reviewing basic prepared fact sheets specific to the Upper Basin, needed to be a prerequisite to participate as an informed citizen. There were plenty of uninformed citizens wanting more time for the review process, but without willingness to learn fact from propaganda. More time would not likely help with the outcome. I agree, uninformed citizens have a right to speak too, but maliciousness did not seem appropriate with the majority of speakers missing the point of the hearing regarding the Upper Basin objectives proposed.

I185-2 As for local gridlock, I will limit opinion in lieu of the Upper Basin proposal focus, but sense stalling from "responsible parties" to devalue their settlement owed or fear future practices may not comply with current discharge laws. Here we are at the next critical step in the process, with a flawed alternative Clean Up Plan from the State of Idaho originally. Some Idaho State representatives have undermined forward momentum in the Clean

1

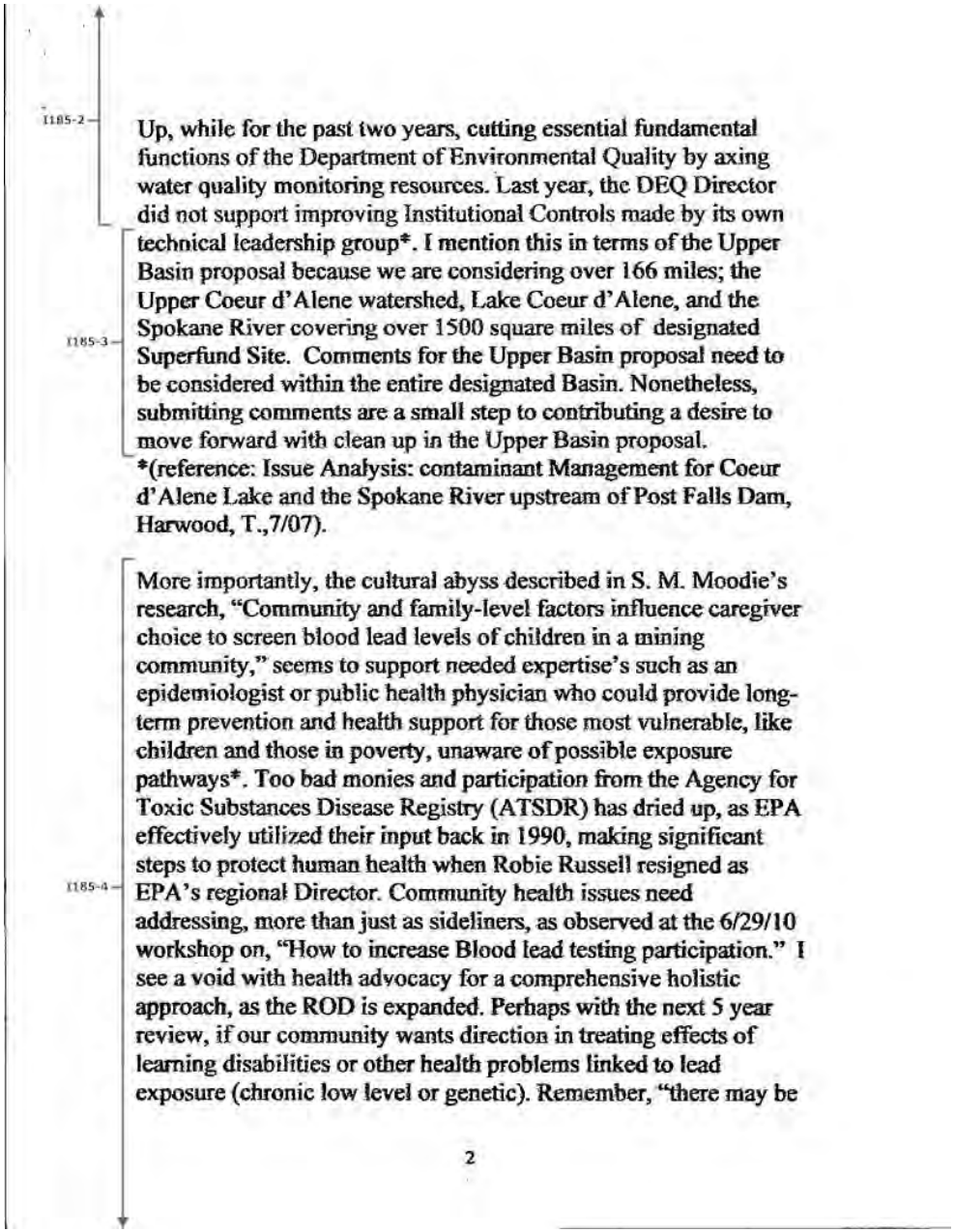
USEPA SF
1357479

Response to comment I185-1

Comment noted. EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund cleanup in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of our work.

Response to comment I185-2

Comment noted. EPA's decision-making process was a careful and collaborative effort that included input from state and local governments, tribes, other federal agencies, the Basin Commission and the public.



I185-2

Up, while for the past two years, cutting essential fundamental functions of the Department of Environmental Quality by axing water quality monitoring resources. Last year, the DEQ Director did not support improving Institutional Controls made by its own technical leadership group*. I mention this in terms of the Upper Basin proposal because we are considering over 166 miles; the Upper Coeur d'Alene watershed, Lake Coeur d'Alene, and the Spokane River covering over 1500 square miles of designated Superfund Site. Comments for the Upper Basin proposal need to be considered within the entire designated Basin. Nonetheless, submitting comments are a small step to contributing a desire to move forward with clean up in the Upper Basin proposal.

I185-3

*(reference: Issue Analysis: contaminant Management for Coeur d'Alene Lake and the Spokane River upstream of Post Falls Dam, Harwood, T.,7/07).

More importantly, the cultural abyss described in S. M. Moodie's research, "Community and family-level factors influence caregiver choice to screen blood lead levels of children in a mining community," seems to support needed expertise's such as an epidemiologist or public health physician who could provide long-term prevention and health support for those most vulnerable, like children and those in poverty, unaware of possible exposure pathways*. Too bad monies and participation from the Agency for Toxic Substances Disease Registry (ATSDR) has dried up, as EPA effectively utilized their input back in 1990, making significant steps to protect human health when Robie Russell resigned as

I185-4

EPA's regional Director. Community health issues need addressing, more than just as sideliners, as observed at the 6/29/10 workshop on, "How to increase Blood lead testing participation." I see a void with health advocacy for a comprehensive holistic approach, as the ROD is expanded. Perhaps with the next 5 year review, if our community wants direction in treating effects of learning disabilities or other health problems linked to lead exposure (chronic low level or genetic). Remember, "there may be

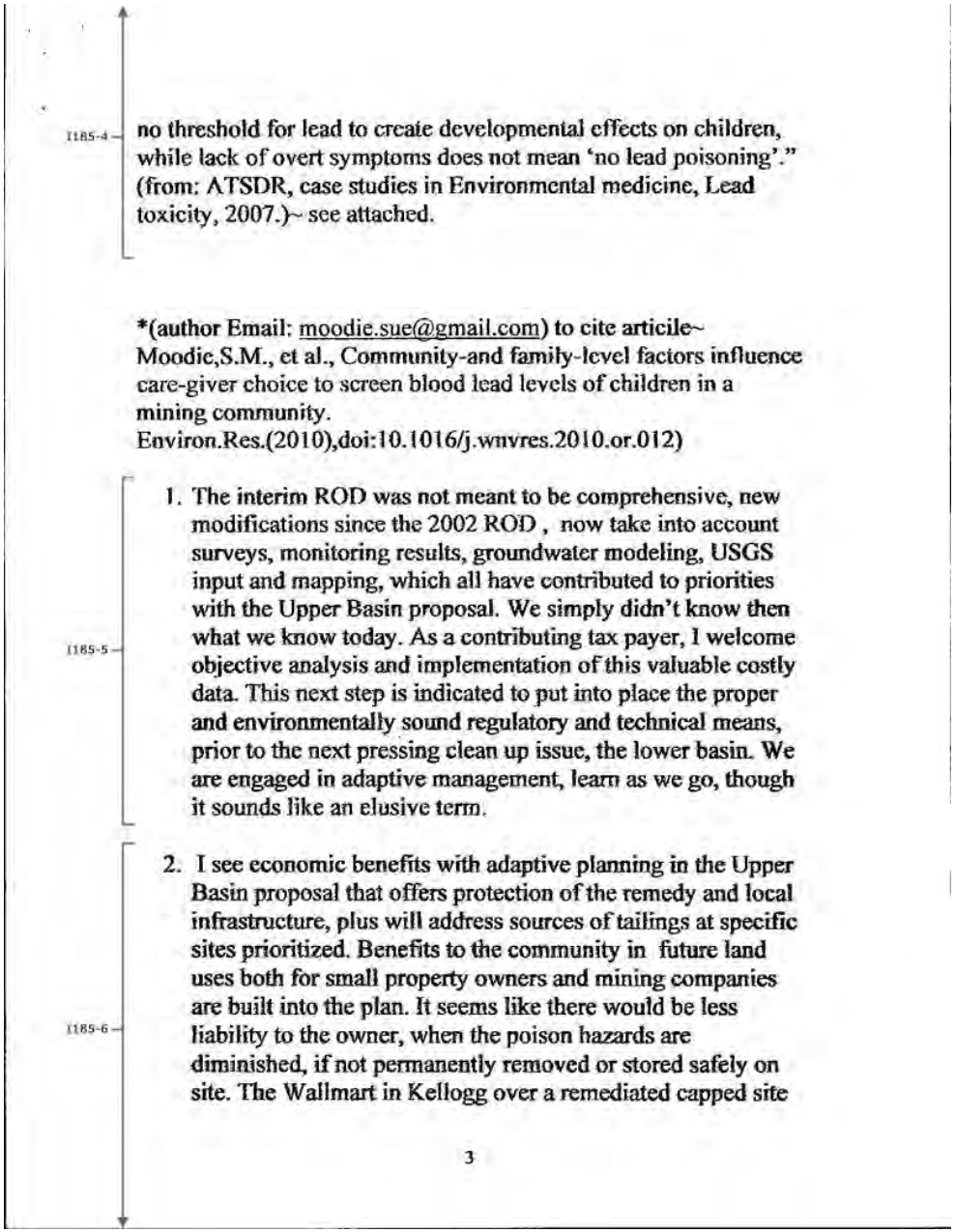
2

Response to comment I185-3

Thank you for your comment. As noted this ROD Amendment focuses on the Upper Basin which primarily includes the SFCDR watershed.

Response to comment I185-4

Thank you for your comment. EPA continues to work with Panhandle Health to identify ways to increase educational opportunities about health risks associated with the Bunker Hill Superfund Site and to find ways to increase participation in the voluntary blood screening program. See response to Comment No. I295-1.



I185-4 no threshold for lead to create developmental effects on children, while lack of overt symptoms does not mean 'no lead poisoning'." (from: ATSDR, case studies in Environmental medicine, Lead toxicity, 2007.)~ see attached.

*(author Email: moodie.sue@gmail.com) to cite articile~ Moodie,S.M., et al., Community-and family-level factors influence care-giver choice to screen blood lead levels of children in a mining community. Environ.Res.(2010),doi:10.1016/j.wnvres.2010.or.012)

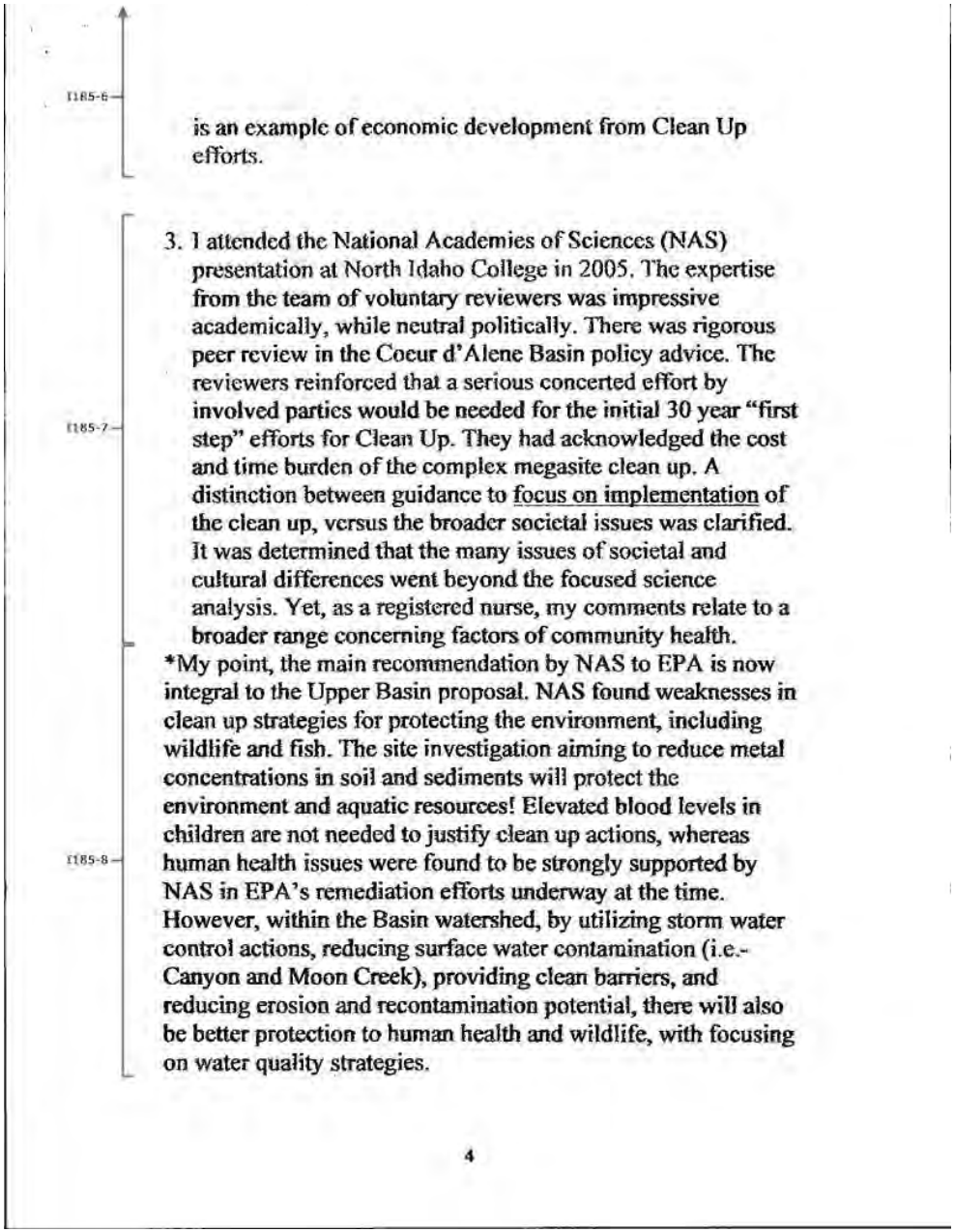
I185-5 1. The interim ROD was not meant to be comprehensive, new modifications since the 2002 ROD , now take into account surveys, monitoring results, groundwater modeling, USGS input and mapping, which all have contributed to priorities with the Upper Basin proposal. We simply didn't know then what we know today. As a contributing tax payer, I welcome objective analysis and implementation of this valuable costly data. This next step is indicated to put into place the proper and environmentally sound regulatory and technical means, prior to the next pressing clean up issue, the lower basin. We are engaged in adaptive management, learn as we go, though it sounds like an elusive term.

I185-6 2. I see economic benefits with adaptive planning in the Upper Basin proposal that offers protection of the remedy and local infrastructure, plus will address sources of tailings at specific sites prioritized. Benefits to the community in future land uses both for small property owners and mining companies are built into the plan. It seems like there would be less liability to the owner, when the poison hazards are diminished, if not permanently removed or stored safely on site. The Wallmart in Kellogg over a remediated capped site

3

Response to comment I185-5
Comment noted.

Response to comment I185-6
Thank you for the comment.



I185-6

is an example of economic development from Clean Up efforts.

I185-7

3. I attended the National Academies of Sciences (NAS) presentation at North Idaho College in 2005. The expertise from the team of voluntary reviewers was impressive academically, while neutral politically. There was rigorous peer review in the Coeur d'Alene Basin policy advice. The reviewers reinforced that a serious concerted effort by involved parties would be needed for the initial 30 year "first step" efforts for Clean Up. They had acknowledged the cost and time burden of the complex megasite clean up. A distinction between guidance to focus on implementation of the clean up, versus the broader societal issues was clarified. It was determined that the many issues of societal and cultural differences went beyond the focused science analysis. Yet, as a registered nurse, my comments relate to a broader range concerning factors of community health.

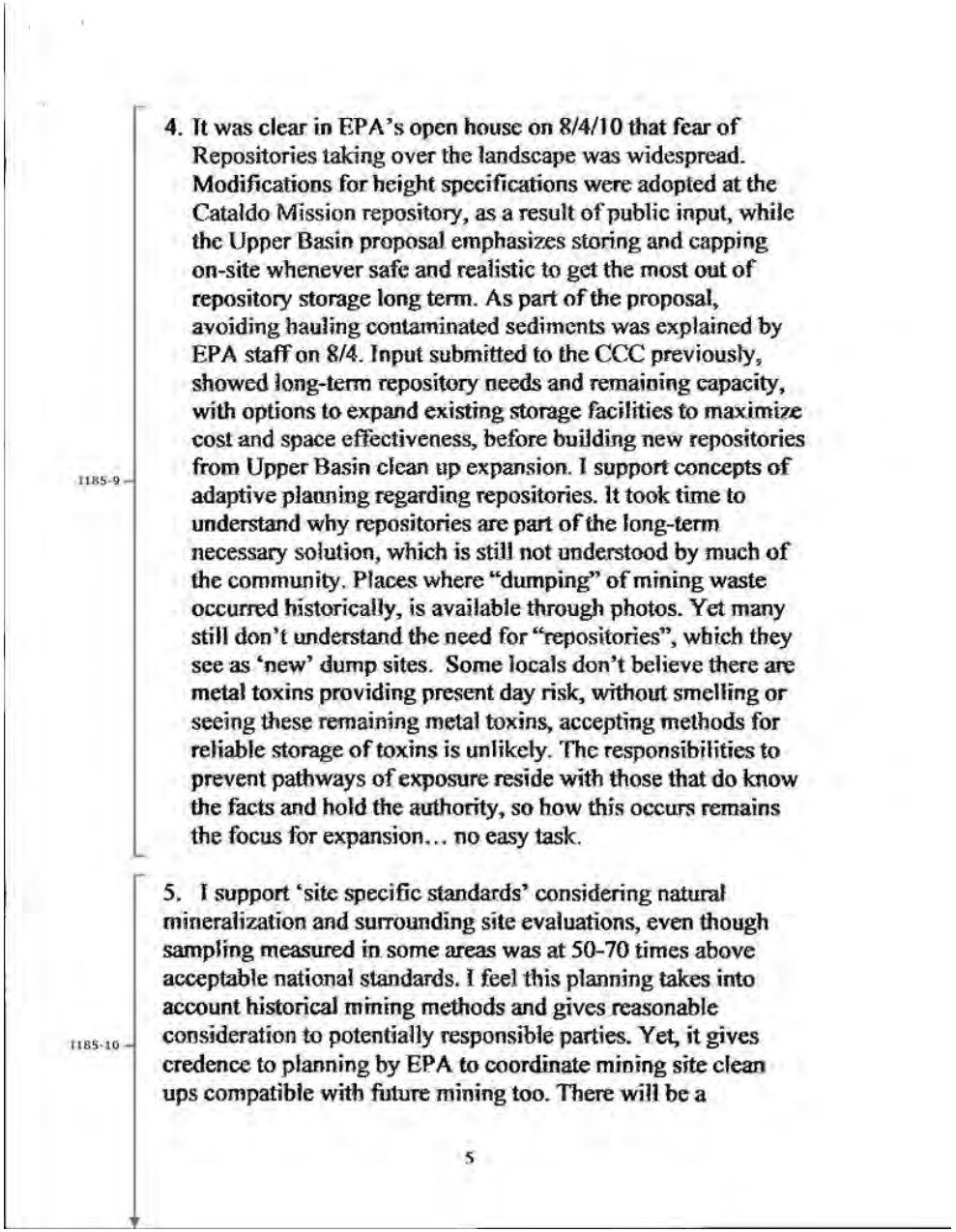
I185-8

*My point, the main recommendation by NAS to EPA is now integral to the Upper Basin proposal. NAS found weaknesses in clean up strategies for protecting the environment, including wildlife and fish. The site investigation aiming to reduce metal concentrations in soil and sediments will protect the environment and aquatic resources! Elevated blood levels in children are not needed to justify clean up actions, whereas human health issues were found to be strongly supported by NAS in EPA's remediation efforts underway at the time. However, within the Basin watershed, by utilizing storm water control actions, reducing surface water contamination (i.e.- Canyon and Moon Creek), providing clean barriers, and reducing erosion and recontamination potential, there will also be better protection to human health and wildlife, with focusing on water quality strategies.

4

Response to comment I185-7
Comment noted.

Response to comment I185-8
Comment noted.



4. It was clear in EPA's open house on 8/4/10 that fear of Repositories taking over the landscape was widespread. Modifications for height specifications were adopted at the Cataldo Mission repository, as a result of public input, while the Upper Basin proposal emphasizes storing and capping on-site whenever safe and realistic to get the most out of repository storage long term. As part of the proposal, avoiding hauling contaminated sediments was explained by EPA staff on 8/4. Input submitted to the CCC previously, showed long-term repository needs and remaining capacity, with options to expand existing storage facilities to maximize cost and space effectiveness, before building new repositories from Upper Basin clean up expansion. I support concepts of adaptive planning regarding repositories. It took time to understand why repositories are part of the long-term necessary solution, which is still not understood by much of the community. Places where "dumping" of mining waste occurred historically, is available through photos. Yet many still don't understand the need for "repositories", which they see as 'new' dump sites. Some locals don't believe there are metal toxins providing present day risk, without smelling or seeing these remaining metal toxins, accepting methods for reliable storage of toxins is unlikely. The responsibilities to prevent pathways of exposure reside with those that do know the facts and hold the authority, so how this occurs remains the focus for expansion… no easy task.

I185-9

5. I support 'site specific standards' considering natural mineralization and surrounding site evaluations, even though sampling measured in some areas was at 50-70 times above acceptable national standards. I feel this planning takes into account historical mining methods and gives reasonable consideration to potentially responsible parties. Yet, it gives credence to planning by EPA to coordinate mining site clean ups compatible with future mining too. There will be a

I185-10

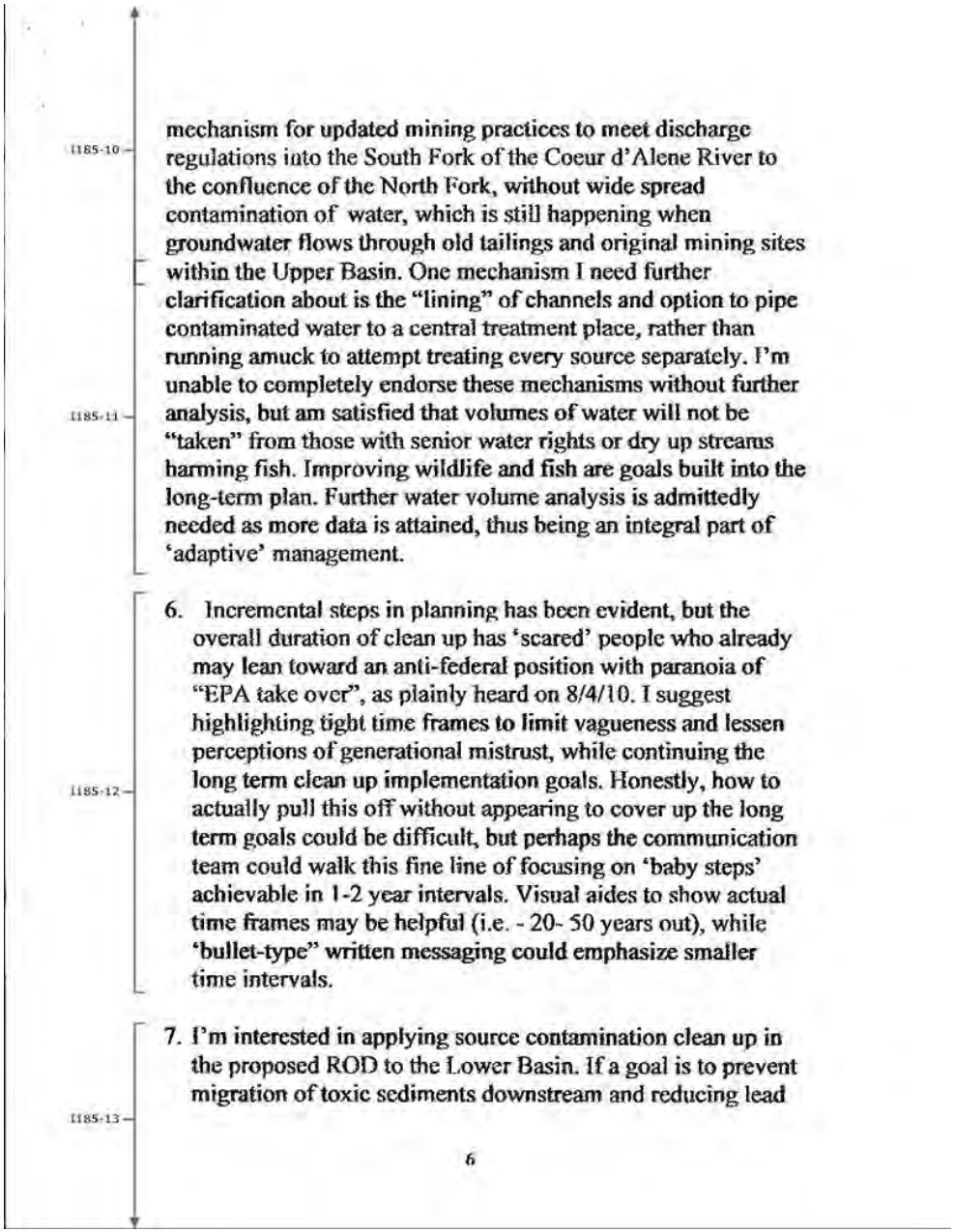
5

Response to comment I185-9

Thank you for the comment. See response to Comment No. I54-3.

Response to comment I185-10

Comment noted. For the Upper Basin cleanup, water quality standards have been identified as applicable or relevant and appropriate requirements (ARARs) to protect aquatic life. The ARARs for protection of the environment in the Upper Basin are the site-specific surface water quality standards developed by the State of Idaho to protect designated and existing beneficial uses. Through the adaptive management process, EPA will implement specific cleanup actions included in the remedy, monitor the effectiveness of those actions to determine whether cleanup levels are being achieved, and make adjustments to future cleanup actions to benefit from the information gained through the effectiveness monitoring.



I185-10 mechanism for updated mining practices to meet discharge regulations into the South Fork of the Coeur d'Alene River to the confluence of the North Fork, without wide spread contamination of water, which is still happening when groundwater flows through old tailings and original mining sites within the Upper Basin. One mechanism I need further clarification about is the "lining" of channels and option to pipe contaminated water to a central treatment place, rather than running amuck to attempt treating every source separately. I'm unable to completely endorse these mechanisms without further

I185-11 analysis, but am satisfied that volumes of water will not be "taken" from those with senior water rights or dry up streams harming fish. Improving wildlife and fish are goals built into the long-term plan. Further water volume analysis is admittedly needed as more data is attained, thus being an integral part of 'adaptive' management.

6. Incremental steps in planning has been evident, but the overall duration of clean up has 'scared' people who already may lean toward an anti-federal position with paranoia of "EPA take over", as plainly heard on 8/4/10. I suggest highlighting tight time frames to limit vagueness and lessen perceptions of generational mistrust, while continuing the

I185-12 long term clean up implementation goals. Honestly, how to actually pull this off without appearing to cover up the long term goals could be difficult, but perhaps the communication team could walk this fine line of focusing on 'baby steps' achievable in 1-2 year intervals. Visual aides to show actual time frames may be helpful (i.e. - 20- 50 years out), while 'bullet-type" written messaging could emphasize smaller time intervals.

7. I'm interested in applying source contamination clean up in the proposed ROD to the Lower Basin. If a goal is to prevent

I185-13 migration of toxic sediments downstream and reducing lead

6

Response to comment I185-11

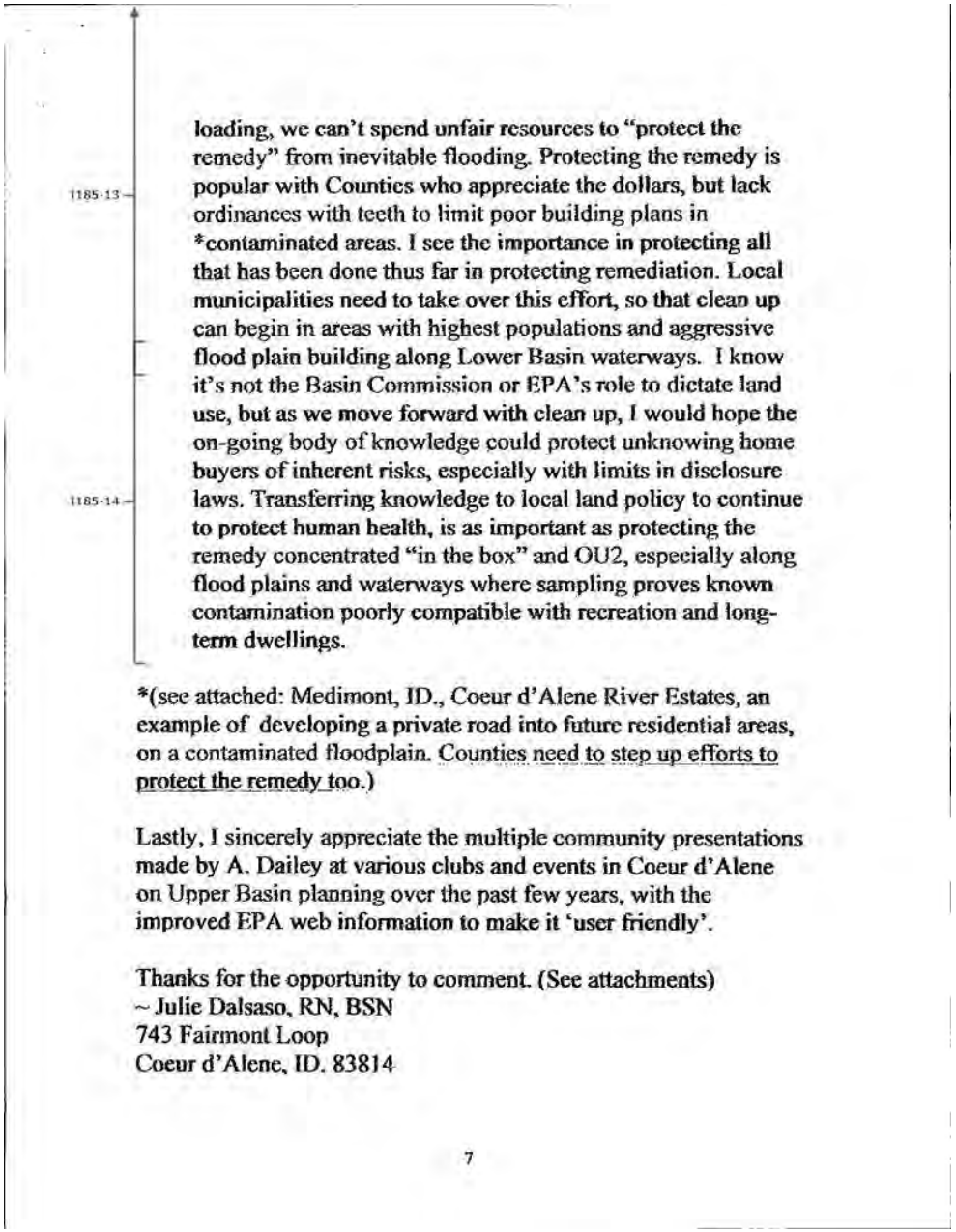
With regard to stream lining, see response to Comment No. I828-10. With regard to water rights, see response to Comment No. SA4-12. With regard to wildlife and fish, see response to Comment No. LC33-10.

Response to comment I185-12

Comment noted. See response to Comment No. I58-1.

Response to comment I185-13

Work in the Lower Basin is continuing with additional characterization and refinement of the Conceptual Site Model and will likely include pilot projects. EPA continues to pursue data collection and analysis efforts in the Lower Basin to support the future development and evaluation of remedial alternatives. After these studies have been completed, EPA expects to select additional cleanup actions, subject to public comment, to address contamination issues in the Lower Basin. Although the Lower Basin is not included in the Selected Remedy, actions in the Upper Basin are expected to improve water quality and reduce the movement of contaminated sediments downstream in the Lower Basin. Thus, the Upper Basin cleanup is expected to complement cleanup activities in the Lower Basin by reducing the flow of contaminated materials and reducing the potential for recontamination from the Upper Basin to the Lower Basin. Actions in the Lower Basin will be conducted concurrently with Upper Basin cleanups depending on recontamination and other factors. The Selected Remedy includes specific actions to safeguard clean barriers installed to protect human health.



I185-13

I185-14

loading, we can't spend unfair resources to "protect the remedy" from inevitable flooding. Protecting the remedy is popular with Counties who appreciate the dollars, but lack ordinances with teeth to limit poor building plans in *contaminated areas. I see the importance in protecting all that has been done thus far in protecting remediation. Local municipalities need to take over this effort, so that clean up can begin in areas with highest populations and aggressive flood plain building along Lower Basin waterways. I know it's not the Basin Commission or EPA's role to dictate land use, but as we move forward with clean up, I would hope the on-going body of knowledge could protect unknowing home buyers of inherent risks, especially with limits in disclosure laws. Transferring knowledge to local land policy to continue to protect human health, is as important as protecting the remedy concentrated "in the box" and OU2, especially along flood plains and waterways where sampling proves known contamination poorly compatible with recreation and long-term dwellings.

*(see attached: Medimont, ID., Coeur d'Alene River Estates, an example of developing a private road into future residential areas, on a contaminated floodplain. Counties need to step up efforts to protect the remedy too.)

Lastly, I sincerely appreciate the multiple community presentations made by A. Dailey at various clubs and events in Coeur d'Alene on Upper Basin planning over the past few years, with the improved EPA web information to make it 'user friendly'.

Thanks for the opportunity to comment. (See attachments)
~ Julie Dalsaso, RN, BSN
743 Fairmont Loop
Coeur d'Alene, ID. 83814

7

Response to comment I185-14

Thank you for your comment. EPA continues to work with the Idaho Department of Environmental Quality and Panhandle Health District to ensure both prospective and current residents and business owners understand the health risks associated with mining related metal contamination.

Environmental Research

Contents lists available at ScienceDirect

Environmental Research

journal homepage: www.elsevier.com/locate/envres

* See page 2 / AD 8/22/10

Community- and family-level factors influence care-giver choice to screen blood lead levels of children in a mining community

S.M. Moodie [a,*], E.K. Tsui [b], E.K. Silbergeld [a]

[a] Johns Hopkins School of Public Health, Department of Environmental Health and Engineering, 615 N. Wolfe Street, Room E6644, Baltimore, MD 21205, USA
[b] Johns Hopkins School of Public Health, Department of Health Behavior and Society, 615 N. Wolfe Street, Room E6644, Baltimore, MD 21205, USA

ARTICLE INFO

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ABSTRACT

Context: Bunker Hill, in Kellogg, Idaho, formerly a lead mine (1884–1981) and smelter (1917–1981), is now a Superfund site listed on the Environmental Protection Agency's (EPA) National Priorities List. Lead contamination from the site is widespread due to past smelter discharges to land, water, and air, placing children at risk for both exposure to lead and resultant health effects of lead. Since 1983, the EPA has used child blood lead levels to inform the clean-up standards for the Bunker Hill Superfund site. This study was undertaken to examine factors that have contributed to the significant fall-off in the rates and numbers of children being screened for blood lead in Kellogg (number screened decreased from 195 to 8 from 2002 to 2007). The goal of this research project was to define community- and family-level factors which influence care-giver choice to screen blood lead levels of their children in this environment.

Methods: This formative research study used mixed methods and was comprised of three research components: (1) preliminary interviews using community-based participatory research methods to define key research questions of relevance to community members, government and NGOs working in relation to the Bunker Hill clean-up; (2) a quantitative analysis of a cross-sectional household survey conducted with adult care-givers about child blood lead screening in Kellogg; and (3) ethnographic community rapid assessment methods formed the in-depth interview process and qualitative analysis.

Results: The survey showed the likelihood of blood lead screening that for children under the age of 18 years increases 34% with each one-year increase in current age of the child (95% CI, 1.06–1.67, p-value=0.009); and decreases 45% with annual household income greater than $10,000 (95% CI, 0.35–0.88, p-value=0.013). Sibling birth order increased the likelihood of blood lead screening by 61% (95% CI, 1.04–2.48, p-value=0.032) for each successive child. Female children were rated by their care-givers as 3.7 times less agitated or easily angered than male children (95% CI, 1.5–8.8, p-value=0.005). Across all levels of interviews, regulators, residents, and non-governmental organization representatives reported that Kellogg's long history as a mining town has continued to influence attitudes and actions of care-givers to access blood lead screening for their children. The mining context has been described as instilling stigmas, parental blame and a sense of shame about lead exposure and resultant health effects.

Discussion: Children under 6 years of age are currently the least likely to have been screened for lead in Kellogg and screening rates decreased in the 2000s. According to most indicators, socio-economic status did not influence the likelihood of a care-giver to screen children's blood lead levels. However, children in homes with an annual income below $10,000 were more likely to have been screened than the rest of the population. Former concerted screening efforts, including outreach, support, follow-up, and financial incentives in the 1980s–1990s to screen children, may have influenced low-income residents. Programmatic outreach for children under 6 years of age in Kellogg should focus on increasing female child and first child blood lead screening, rather than targeting only low-income families, by improving approaches to promotion, implementations and environmental follow-up for child lead screening. Some families have resided in Kellogg for five to six generations, and the long-term mining context influences community values and perceptions of lead exposure and screening for children through a conflicted combination of pride in the mining history, attachment to the past economy that supported the community in juxtaposition to the personalized blame, shame, guilt, and stigma associated with children having high blood lead levels. Health communication and other programs should prioritize methods of reducing parental feelings of blame, shame and guilt, and stigmas associated with the

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E-mail address: moodie.sue@gmail.com (S.M. Moodie).

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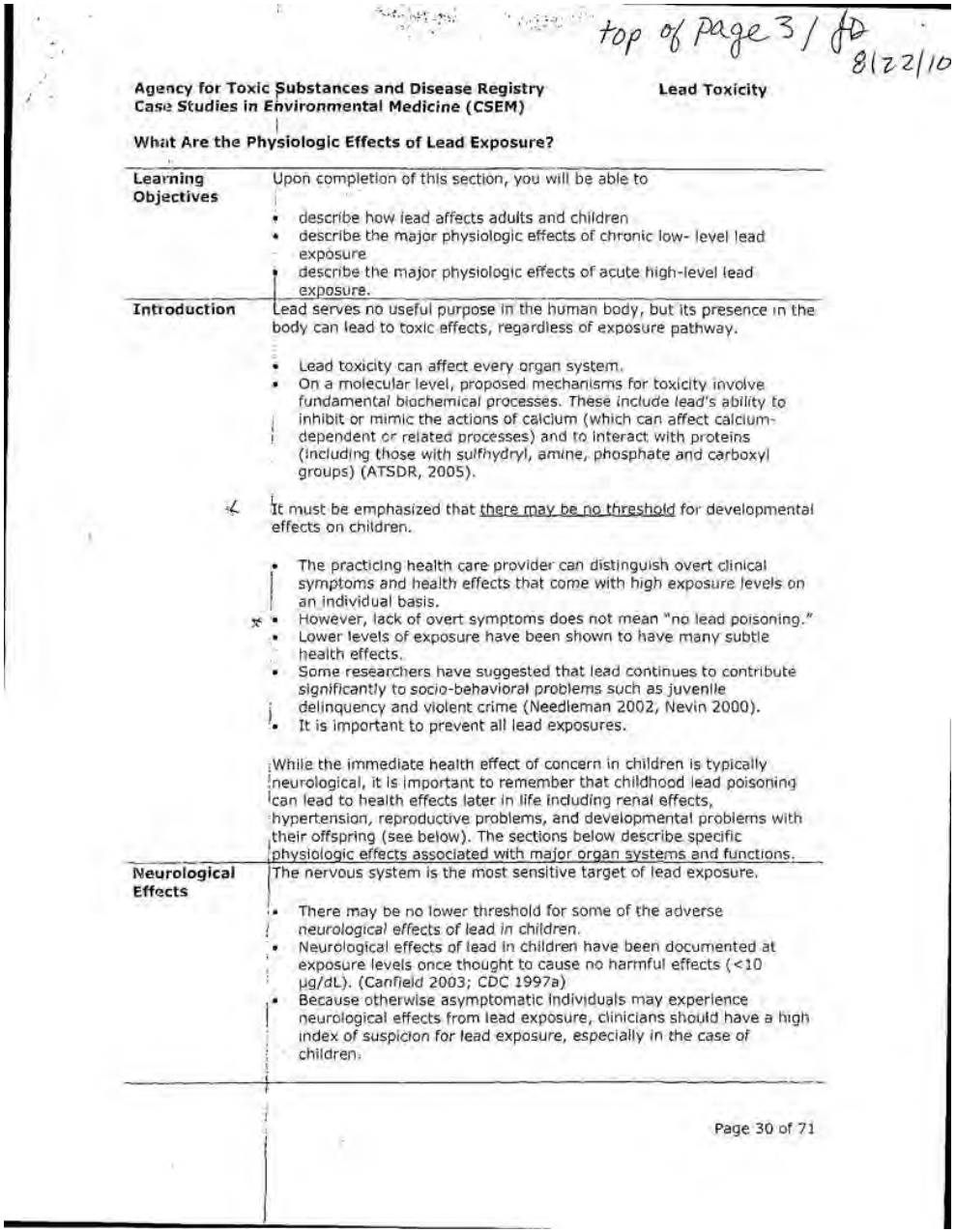
No comments



top of page 3 / 8/22/10

Agency for Toxic Substances and Disease Registry **Lead Toxicity**
Case Studies in Environmental Medicine (CSEM)

What Are the Physiologic Effects of Lead Exposure?

Learning Objectives

Upon completion of this section, you will be able to

- describe how lead affects adults and children
- describe the major physiologic effects of chronic low- level lead exposure
- describe the major physiologic effects of acute high-level lead exposure.

Introduction

Lead serves no useful purpose in the human body, but its presence in the body can lead to toxic effects, regardless of exposure pathway.

- Lead toxicity can affect every organ system.
- On a molecular level, proposed mechanisms for toxicity involve fundamental biochemical processes. These include lead's ability to inhibit or mimic the actions of calcium (which can affect calcium-dependent or related processes) and to interact with proteins (including those with sulfhydryl, amine, phosphate and carboxyl groups) (ATSDR, 2005).

It must be emphasized that there may be no threshold for developmental effects on children.

- The practicing health care provider can distinguish overt clinical symptoms and health effects that come with high exposure levels on an individual basis.
- However, lack of overt symptoms does not mean "no lead poisoning."
- Lower levels of exposure have been shown to have many subtle health effects.
- Some researchers have suggested that lead continues to contribute significantly to socio-behavioral problems such as juvenile delinquency and violent crime (Needleman 2002, Nevin 2000).
- It is important to prevent all lead exposures.

While the immediate health effect of concern in children is typically neurological, it is important to remember that childhood lead poisoning can lead to health effects later in life including renal effects, hypertension, reproductive problems, and developmental problems with their offspring (see below). The sections below describe specific physiologic effects associated with major organ systems and functions.

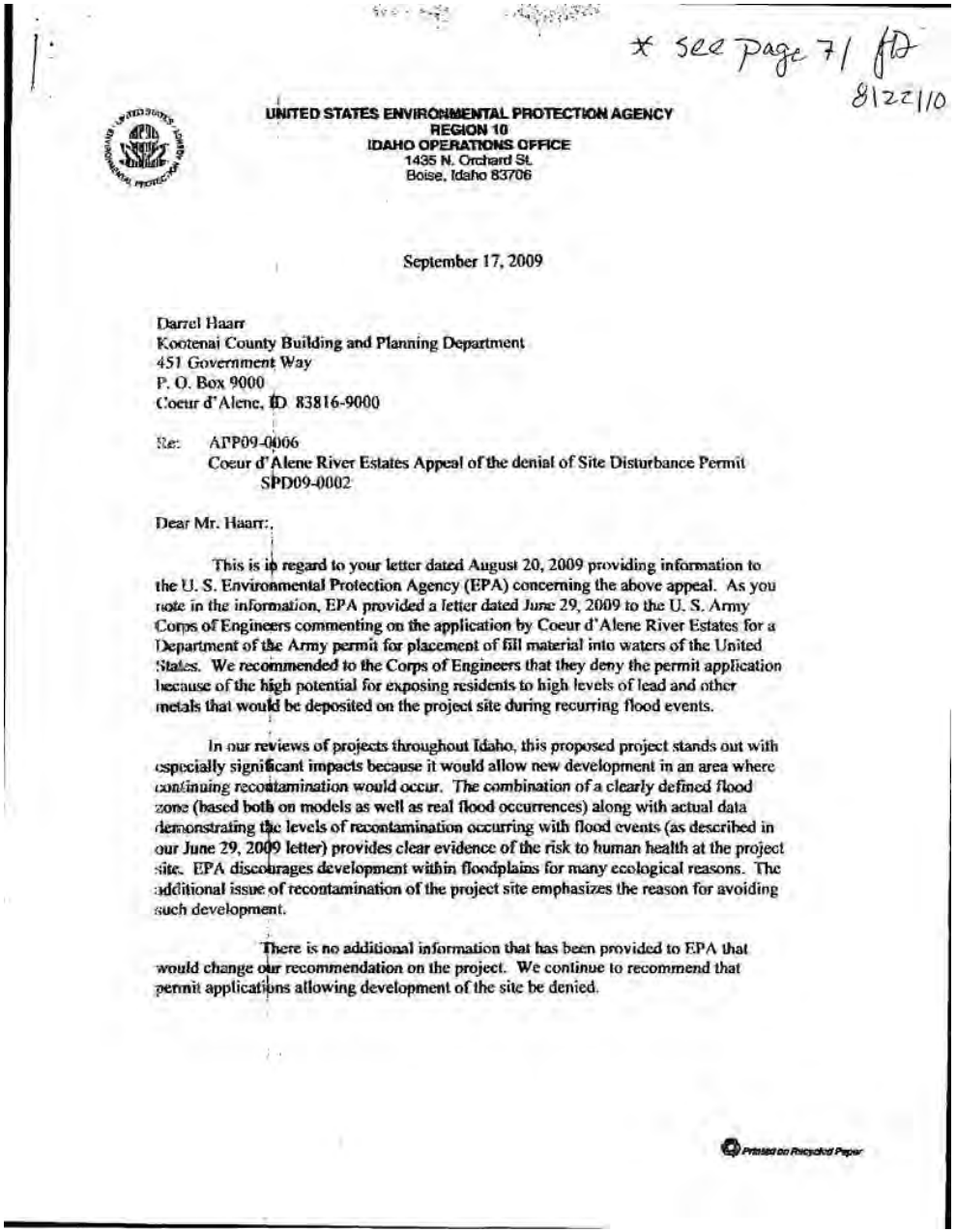
Neurological Effects

The nervous system is the most sensitive target of lead exposure.

- There may be no lower threshold for some of the adverse neurological effects of lead in children.
- Neurological effects of lead in children have been documented at exposure levels once thought to cause no harmful effects (<10 µg/dL). (Canfield 2003; CDC 1997a)
- Because otherwise asymptomatic individuals may experience neurological effects from lead exposure, clinicians should have a high index of suspicion for lead exposure, especially in the case of children.

Page 30 of 71

No comments



* see Page 71 fD
8/22/10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
IDAHO OPERATIONS OFFICE
1435 N. Orchard St.
Boise, Idaho 83706

September 17, 2009

Darrel Haarr
Kootenai County Building and Planning Department
451 Government Way
P. O. Box 9000
Coeur d'Alene, ID 83816-9000

Re: APP09-0006
Coeur d'Alene River Estates Appeal of the denial of Site Disturbance Permit
SPD09-0002

Dear Mr. Haarr:

This is in regard to your letter dated August 20, 2009 providing information to the U. S. Environmental Protection Agency (EPA) concerning the above appeal. As you note in the information, EPA provided a letter dated June 29, 2009 to the U. S. Army Corps of Engineers commenting on the application by Coeur d'Alene River Estates for a Department of the Army permit for placement of fill material into waters of the United States. We recommended to the Corps of Engineers that they deny the permit application because of the high potential for exposing residents to high levels of lead and other metals that would be deposited on the project site during recurring flood events.

In our reviews of projects throughout Idaho, this proposed project stands out with especially significant impacts because it would allow new development in an area where continuing recontamination would occur. The combination of a clearly defined flood zone (based both on models as well as real flood occurrences) along with actual data demonstrating the levels of recontamination occurring with flood events (as described in our June 29, 2009 letter) provides clear evidence of the risk to human health at the project site. EPA discourages development within floodplains for many ecological reasons. The additional issue of recontamination of the project site emphasizes the reason for avoiding such development.

There is no additional information that has been provided to EPA that would change our recommendation on the project. We continue to recommend that permit applications allowing development of the site be denied.

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No comments

Danye, Barbara, I275, Letter 616015-39

around the world and that stigma remains with us as long as EPA remains with us. It makes it very difficult to raise money for projects here. I'm asking, can you see that another century of EPA hegemony here in the Silver Valley? Can you see it for what it truly is aside from it being probably the biggest earth-moving projects since Sahara, [Shiman] and Nagasaki? [Laughter] it's a social experiment to determine just how far we can be pushed away from the representative republican democracy that we grew up in to determine just how much unelected Seattle [fiad] that we will put up? Governor Otter it's up to you. Please don't sign this thing. Don't sign the document. Do not advocate Idaho's rights as a sovereign state and do not abandon us to a century's occupation by the unelected bureaucrats of Region 10. Do not sign. Oh, EPA will punish Idaho right? They'll take away your DEQ funds. Well who needs DEQ? There's no force or for defense anyway. So please don't go away with your predecessor and I didn't mean now Senator Risch. Don't talk tough up here and then go fold like a cheap suit ten days later in Seattle [laughter]. The executive sovereign state of Idaho is not a gofer for a bloated bureaucracy in Seattle. Please respect that and respect us. Let's put this ROD on ice for 10 years, 20 years. Let's see if nature can't do much less intrusively what they're planning to do with the [you-coulds] and bureaucrats and stuff now. Anyway, thanks for coming.

Barbara Danye:

I275-1 I'm a retired medical professional and I was a public health inspector in California. I have seen no evidence of credible medical evidence that any of the elements the EPA is stating are excessive in our soil or in our water have any continuing health issue in the Silver Valley. Everything has a potential. Everything we breathe, drink and eat has a potential to do us harm. Even EPA-certified water will kill you if you drink too much too fast.

I275-2 I think all of us are tired of our elected officials and the bureaucracy they create, introducing over 2,000 pages of policy and procedure, entering into our lives, health, homes, finances and personal decision making. Please remember that we are the citizens of the valley. We are the state and our nation. God bless America and please defend our constitution.

Bradley Kucera:

Thank you very much for being able to speak before the panel. My name is Bradley Kucera. I am a professional engineer, water rights

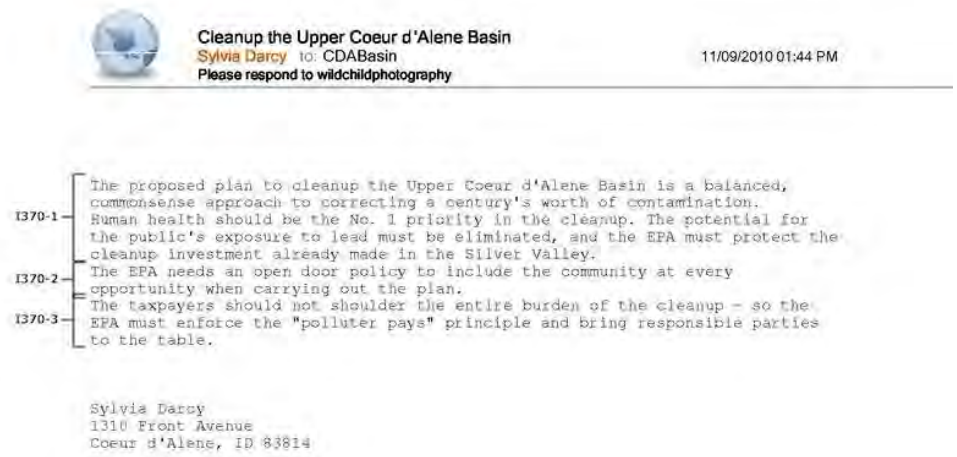
Response to comment I275-1

See response to Comment No. I295-1

Response to comment I275-2

Comment noted.

Darcy, Sylvia, I370, Letter 616257



Cleanup the Upper Coeur d'Alene Basin
Sylvia Darcy to: CDABasin 11/09/2010 01:44 PM
Please respond to wildchildphotography

I370-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I370-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I370-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Sylvia Darcy
1310 Front Avenue
Coeur d'Alene, ID 83814

616257

Response to comment I370-1

See response to Comment No. I295-1.

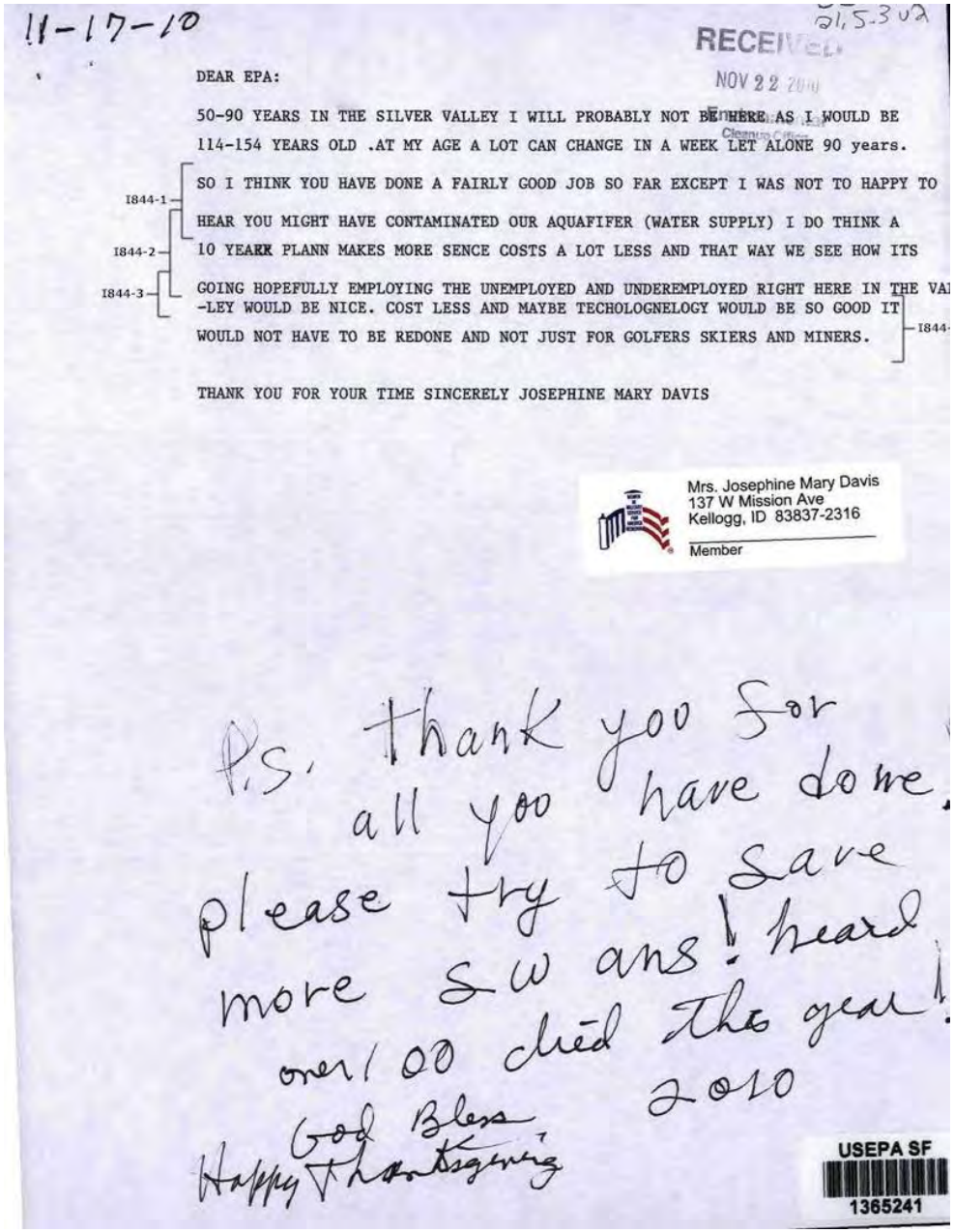
Response to comment I370-2

See response to Comment No. I295-2.

Response to comment I370-3

See response to Comment No. I295-3.

Davis, Josephine Mary, I844, Letter 1365241



11-17-10

RECEIVED
NOV 22 2010
Cleanup Office

DEAR EPA:

50-90 YEARS IN THE SILVER VALLEY I WILL PROBABLY NOT BE HERE AS I WOULD BE 114-154 YEARS OLD .AT MY AGE A LOT CAN CHANGE IN A WEEK LET ALONE 90 years.

I844-1 SO I THINK YOU HAVE DONE A FAIRLY GOOD JOB SO FAR EXCEPT I WAS NOT TO HAPPY TO HEAR YOU MIGHT HAVE CONTAMINATED OUR AQUAFIFER (WATER SUPPLY) I DO THINK A

I844-2 10 YEARR PLANN MAKES MORE SENCE COSTS A LOT LESS AND THAT WAY WE SEE HOW ITS

I844-3 GOING HOPEFULLY EMPLOYING THE UNEMPLOYED AND UNDEREMPLOYED RIGHT HERE IN THE VA -LEY WOULD BE NICE. COST LESS AND MAYBE TECHOLOGNELOGY WOULD BE SO GOOD IT WOULD NOT HAVE TO BE REDONE AND NOT JUST FOR GOLFERS SKIERS AND MINERS. I844-

THANK YOU FOR YOUR TIME SINCERELY JOSEPHINE MARY DAVIS

Mrs. Josephine Mary Davis
137 W Mission Ave
Kellogg, ID 83837-2316
Member

P.S. thank you for all you have done, please try to save more SW ans! heard over 100 died this year! 2010
God Bless,
Happy Thanksgiving

USEPA SF
1365241

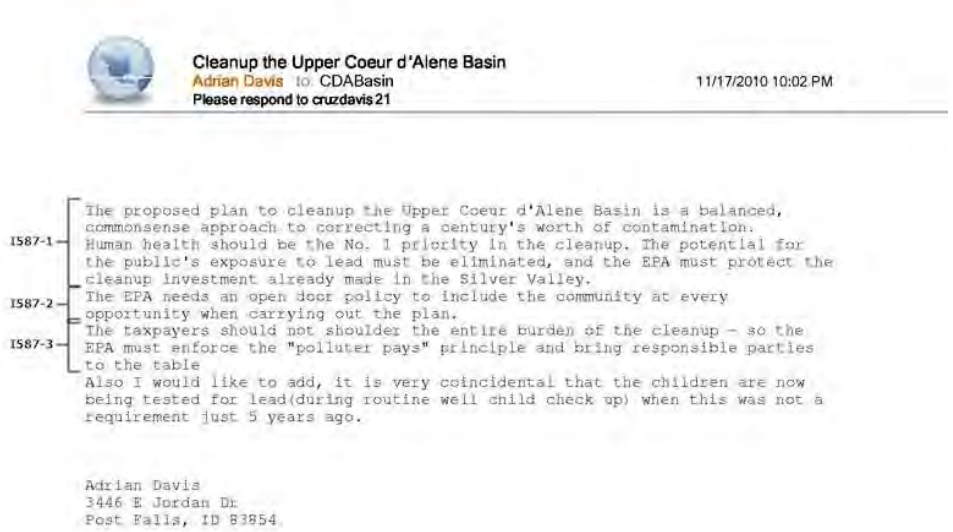
Response to comment I844-1
Thank you for your comment. EPA is unaware of having contaminated a water supply. If the commenter is aware of specific instances of a contaminated water supply, please contact EPA.

Response to comment I844-2
See response to Comment No. I474-2.

Response to comment I844-3
See response to Comment No. I54-2.

Response to comment I844-4
Thank you for your comment.

Davis, Adrian, I587, Letter 617768



Cleanup the Upper Coeur d'Alene Basin
Adrian Davis to: CDABasin 11/17/2010 10:02 PM
Please respond to cruzdavis21

I587-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I587-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I587-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table

Also I would like to add, it is very coincidental that the children are now being tested for lead(during routine well child check up) when this was not a requirement just 5 years ago.

Adrian Davis
3446 E Jordan Dr
Post Falls, ID 83854

617768

Response to comment I587-1

See response to Comment No. I295-1.

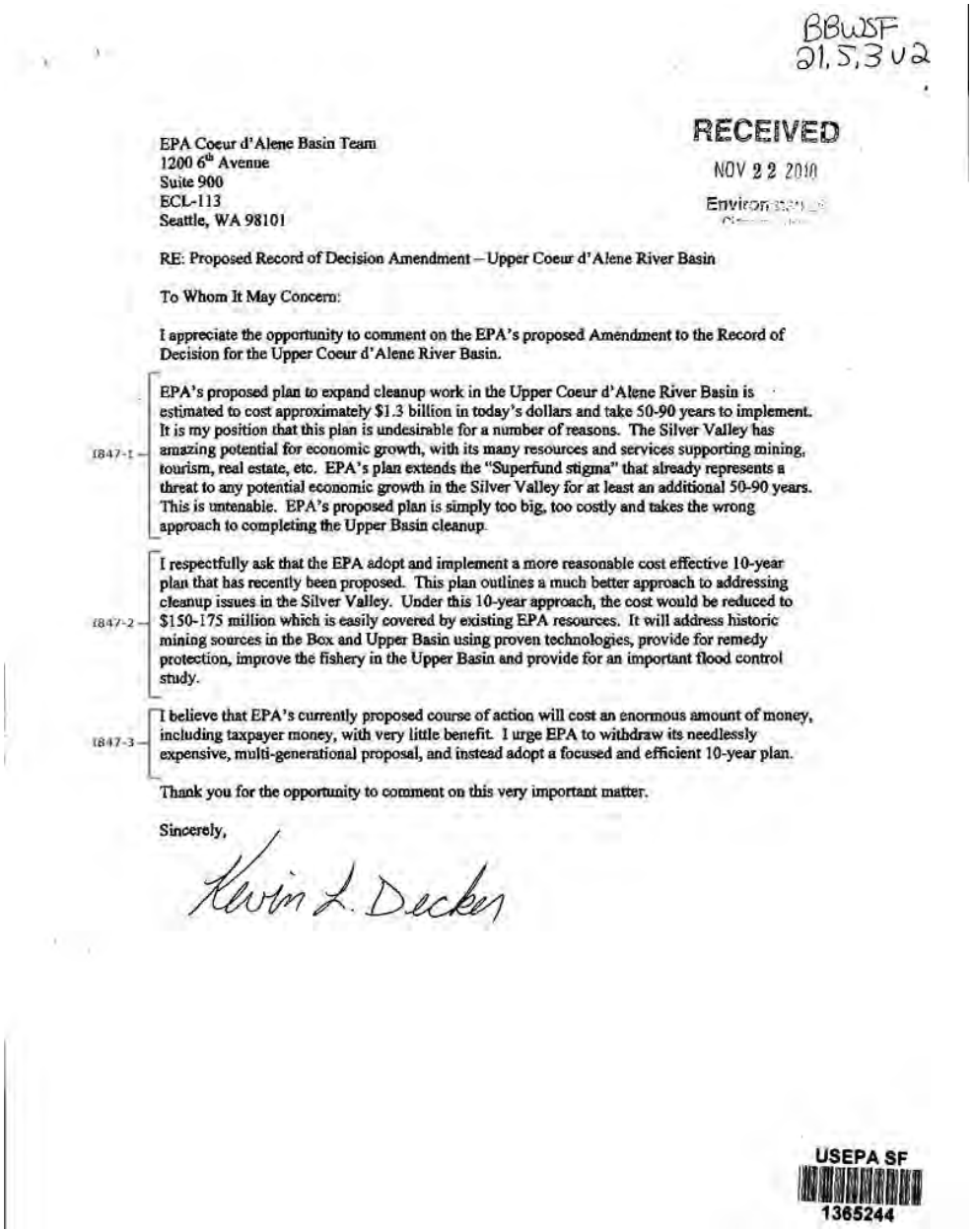
Response to comment I587-2

See response to Comment No. I295-2.

Response to comment I587-3

See response to Comment No. I295-3.

Decker, Kevin L., I847, Letter 1365244



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NOV 22 2010
Environ...

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I847-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I847-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I847-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Kevin L. Decker

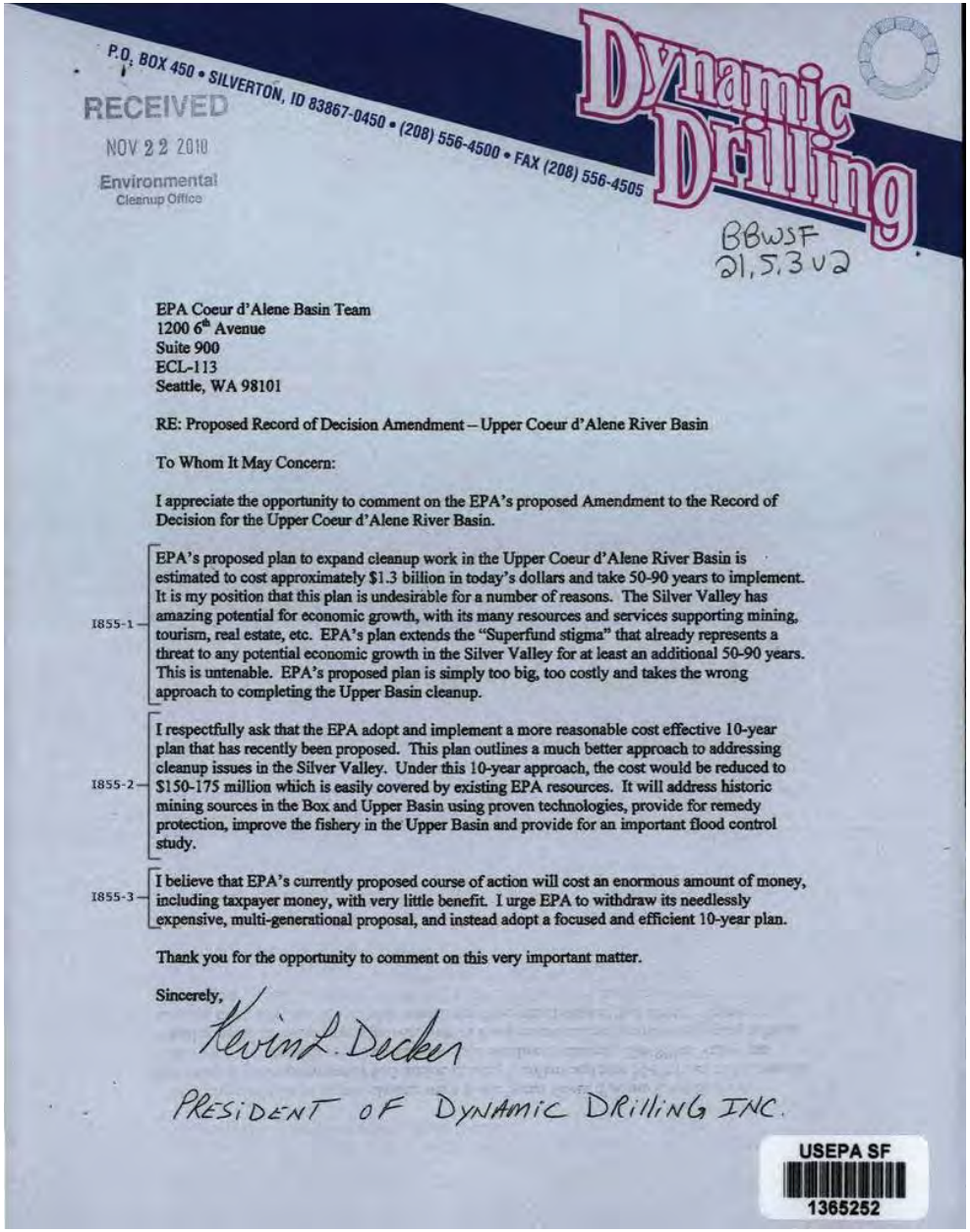
USEPA SF
1365244

Response to comment I847-1
See response to Comment No. I474-1.

Response to comment I847-2
See response to Comment No. I474-2.

Response to comment I847-3
See response to Comment No. I474-3.

Decker, Kevin L., I855, Letter 1365252



P.O. BOX 450 • SILVERTON, ID 83867-0450 • (208) 556-4500 • FAX (208) 556-4505

Dynamic Drilling

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Environmental
Cleanup Office

BBWSF
21,5,3 v2

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I855-1 — EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I855-2 — I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I855-3 — I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Kevin L. Decker

PRESIDENT OF DYNAMIC DRILLING INC.

USEPA SF
1365252

Response to comment I855-1

See response to Comment No. I474-1.

Response to comment I855-2

See response to Comment No. I474-2.

Response to comment I855-3

See response to Comment No. I474-3.

Decker, Edward, I371, Letter 616258

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
rdecker@mvtvusa.tv to: formsubmission 11/15/2010 06:53 PM
Sent by: Rdecker@Mvtvusa.Tv <rdecker=mvtvusa.tv

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

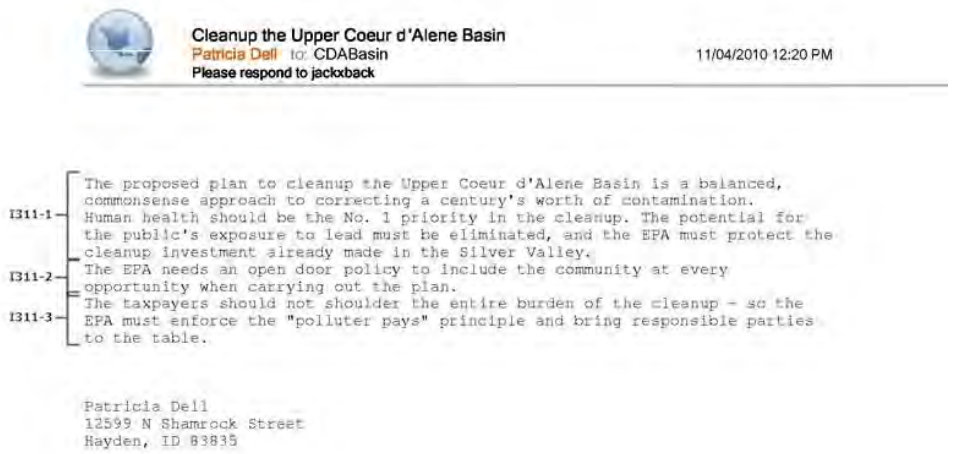
From: EDWARD DECKER
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. We have no idea what 5 years, 10 years, 20 years or 90 years will bring us, so how can we make a plan and keep it at $1.3 billion? The tax payers money EPA is spending on ads to try to sell their plan is proof to me that EPA has no care as to how they spend our tax dollars.
I371-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. This gives the tax payers a chance to to see how the EPA is doing and are not wasting money like they have with the yard cleanup.
Coeur d'Alene Basin Resident: Yes
Email Address: rdecker@mvtvusa.tv
Mailing Address: PO Box 17, 31 Tennis Row|Mullan|Idaho|83846-0017|US
Phone Number: (208) 744-1558

616258

Response to comment I371-1

See response to Comment No. I351-1.

Dell, Patricia, I311, Letter 614441



Cleanup the Upper Coeur d'Alene Basin
Patricia Dell to: CDABasin 11/04/2010 12:20 PM
Please respond to jackxback

I311-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I311-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I311-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Patricia Dell
12599 N Shamrock Street
Hayden, ID 83835

614441

Response to comment I311-1

See response to Comment No. I295-1.

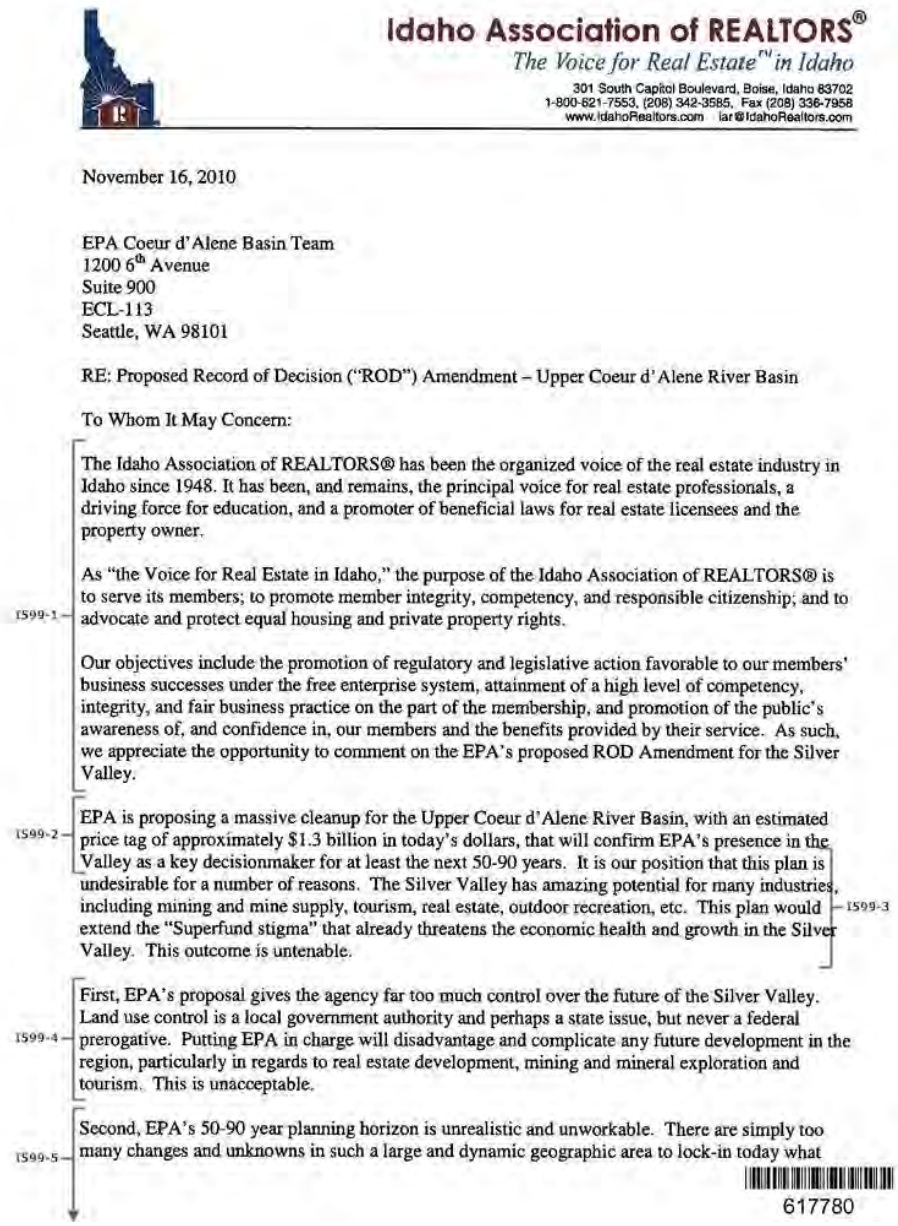
Response to comment I311-2

See response to Comment No. I295-2.

Response to comment I311-3

See response to Comment No. I295-3.

DeLorenzo, Julie, I599, Letter 617780



Idaho Association of REALTORS®
The Voice for Real Estate™ in Idaho
301 South Capitol Boulevard, Boise, Idaho 83702
1-800-621-7553, (208) 342-3585, Fax (208) 336-7958
www.IdahoRealtors.com iar@IdahoRealtors.com

November 16, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision ("ROD") Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

The Idaho Association of REALTORS® has been the organized voice of the real estate industry in Idaho since 1948. It has been, and remains, the principal voice for real estate professionals, a driving force for education, and a promoter of beneficial laws for real estate licensees and the property owner.

I599-1 As "the Voice for Real Estate in Idaho," the purpose of the Idaho Association of REALTORS® is to serve its members; to promote member integrity, competency, and responsible citizenship; and to advocate and protect equal housing and private property rights.

Our objectives include the promotion of regulatory and legislative action favorable to our members' business successes under the free enterprise system, attainment of a high level of competency, integrity, and fair business practice on the part of the membership, and promotion of the public's awareness of, and confidence in, our members and the benefits provided by their service. As such, we appreciate the opportunity to comment on the EPA's proposed ROD Amendment for the Silver Valley.

I599-2 EPA is proposing a massive cleanup for the Upper Coeur d'Alene River Basin, with an estimated price tag of approximately $1.3 billion in today's dollars, that will confirm EPA's presence in the Valley as a key decisionmaker for at least the next 50-90 years. It is our position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for many industries, including mining and mine supply, tourism, real estate, outdoor recreation, etc. This plan would extend the "Superfund stigma" that already threatens the economic health and growth in the Silver Valley. This outcome is untenable. I599-3

I599-4 First, EPA's proposal gives the agency far too much control over the future of the Silver Valley. Land use control is a local government authority and perhaps a state issue, but never a federal prerogative. Putting EPA in charge will disadvantage and complicate any future development in the region, particularly in regards to real estate development, mining and mineral exploration and tourism. This is unacceptable.

I599-5 Second, EPA's 50-90 year planning horizon is unrealistic and unworkable. There are simply too many changes and unknowns in such a large and dynamic geographic area to lock-in today what

617780

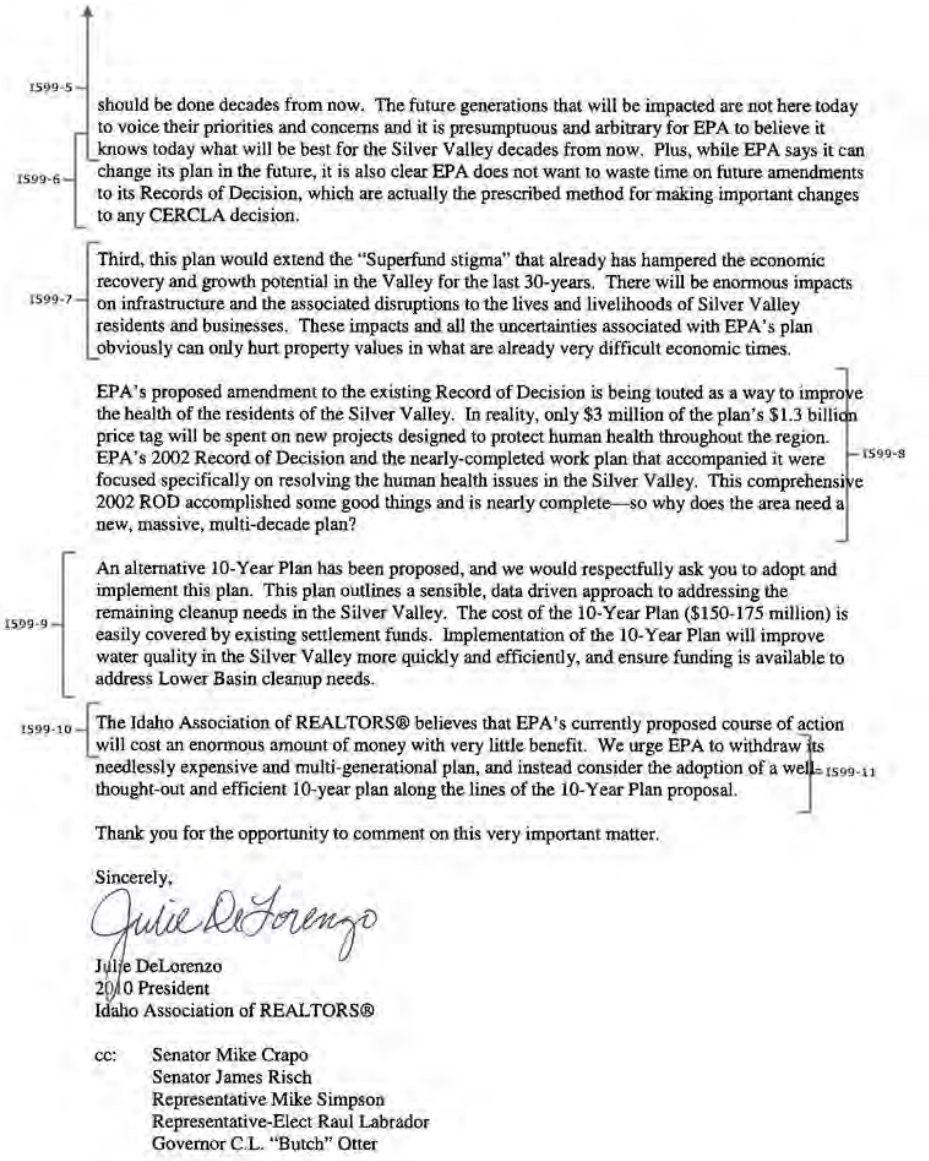
Response to comment I599-1
Thank you for your comments.

Response to comment I599-2
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I599-3
See response to Comment No. I474-1.

Response to comment I599-4
The Selected Remedy does not infringe on local governments' authority to regulate land use. Certain remedial actions, for example mine and mill sites that include consolidation and capping of contaminated materials, may require deed restrictions to ensure the remedy remains protective and that land uses are consistent with the level of cleanup achieved. EPA anticipates that the deed restrictions will be tailored to the area where the remedial action feature is located, i.e. the area where wastes have been consolidated and capped, and filed by the property owner. Previous decision documents have relied on the Institutional Control Program which was implemented through state and local authorities and is administered by the PanHandle Health District. EPA supports the ICP. See responses to Comment Nos. I58-5 and I54-2.

Response to comment I599-5
See response to Comment No. I58-1.



I599-5 should be done decades from now. The future generations that will be impacted are not here today to voice their priorities and concerns and it is presumptuous and arbitrary for EPA to believe it knows today what will be best for the Silver Valley decades from now. Plus, while EPA says it can
I599-6 change its plan in the future, it is also clear EPA does not want to waste time on future amendments to its Records of Decision, which are actually the prescribed method for making important changes to any CERCLA decision.

I599-7 Third, this plan would extend the "Superfund stigma" that already has hampered the economic recovery and growth potential in the Valley for the last 30-years. There will be enormous impacts on infrastructure and the associated disruptions to the lives and livelihoods of Silver Valley residents and businesses. These impacts and all the uncertainties associated with EPA's plan obviously can only hurt property values in what are already very difficult economic times.

EPA's proposed amendment to the existing Record of Decision is being touted as a way to improve the health of the residents of the Silver Valley. In reality, only $3 million of the plan's $1.3 billion price tag will be spent on new projects designed to protect human health throughout the region. I599-8
EPA's 2002 Record of Decision and the nearly-completed work plan that accompanied it were focused specifically on resolving the human health issues in the Silver Valley. This comprehensive 2002 ROD accomplished some good things and is nearly complete—so why does the area need a new, massive, multi-decade plan?

I599-9 An alternative 10-Year Plan has been proposed, and we would respectfully ask you to adopt and implement this plan. This plan outlines a sensible, data driven approach to addressing the remaining cleanup needs in the Silver Valley. The cost of the 10-Year Plan ($150-175 million) is easily covered by existing settlement funds. Implementation of the 10-Year Plan will improve water quality in the Silver Valley more quickly and efficiently, and ensure funding is available to address Lower Basin cleanup needs.

I599-10 The Idaho Association of REALTORS® believes that EPA's currently proposed course of action will cost an enormous amount of money with very little benefit. We urge EPA to withdraw its needlessly expensive and multi-generational plan, and instead consider the adoption of a well- I599-11
thought-out and efficient 10-year plan along the lines of the 10-Year Plan proposal.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Julie DeLorenzo
2010 President
Idaho Association of REALTORS®

cc: Senator Mike Crapo
Senator James Risch
Representative Mike Simpson
Representative-Elect Raul Labrador
Governor C.L. "Butch" Otter

Response to comment I599-6
See response to Comment No. LJ11-2.

Response to comment I599-7
See response to Comment No. I474-1.

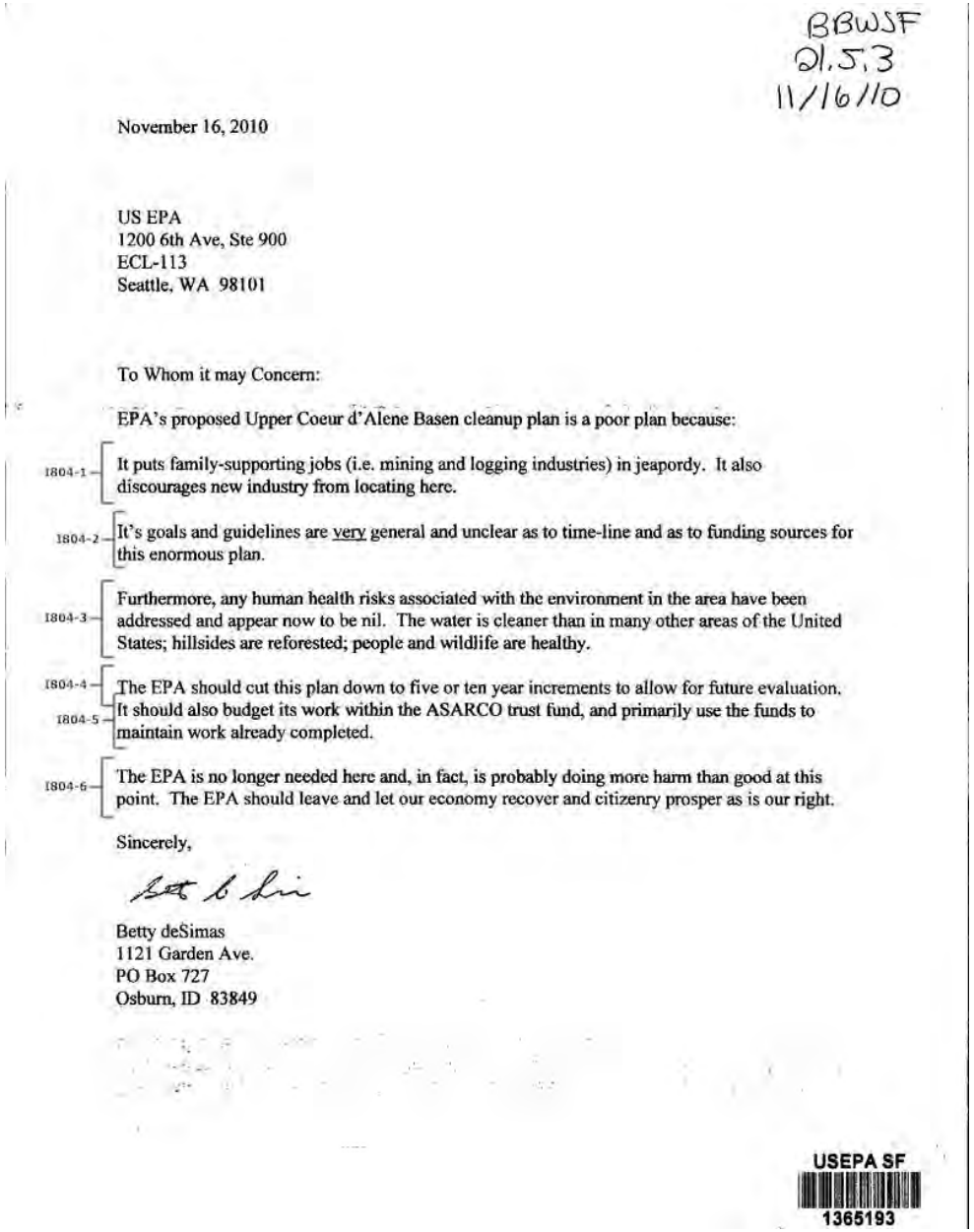
Response to comment I599-8
See response to Comment No. I295-1. The Upper Basin Selected Remedy includes an estimated $33.9 million for remedy protection work in the Upper Basin. Remedy protection is intended to protect the existing human health clean soil barriers (e.g., remediated yards, commercial properties, and rights-of-way) within Upper Basin communities from tributary flooding and high-precipitation events. In addition to the remedy protection work, cleanup actions that address mine waste contamination within drainage areas accessible for recreational use will protect human health and improve surface water quality. Common recreational activities in the Coeur d'Alene Basin include hiking, fishing, hunting, boating, swimming, and all-terrain-vehicle riding. Exposure to lead contamination can cause elevated blood lead levels and resulting adverse neurological effects. EPA has also found that elevated blood lead levels can occur within relatively short exposure periods (such as through recreational exposure to contamination located along the SFCDR, on waste piles, etc.). The Selected Remedy will provide clean surface soil in contaminated areas and reduce particulate lead loading to surface water. In these ways, the Selected Remedy will further reduce the risks people may be exposed to during recreational activities.

Response to comment I599-9
See response to Comment No. I474-2.

Response to comment I599-10
See response to Comment No. I58-2.

Response to comment I599-11
See response to Comment No. I474-2.

deSimas, Betty, I804, Letter 1365193



BBWSF
21.5.3
11/16/10

November 16, 2010

US EPA
1200 6th Ave, Ste 900
ECL-113
Seattle, WA 98101

To Whom it may Concern:

EPA's proposed Upper Coeur d'Alene Basen cleanup plan is a poor plan because:

I804-1 It puts family-supporting jobs (i.e. mining and logging industries) in jeapordy. It also discourages new industry from locating here.

I804-2 It's goals and guidelines are very general and unclear as to time-line and as to funding sources for this enormous plan.

I804-3 Furthermore, any human health risks associated with the environment in the area have been addressed and appear now to be nil. The water is cleaner than in many other areas of the United States; hillsides are reforested; people and wildlife are healthy.

I804-4 The EPA should cut this plan down to five or ten year increments to allow for future evaluation.

I804-5 It should also budget its work within the ASARCO trust fund, and primarily use the funds to maintain work already completed.

I804-6 The EPA is no longer needed here and, in fact, is probably doing more harm than good at this point. The EPA should leave and let our economy recover and citizenry prosper as is our right.

Sincerely,

Betty deSimas
1121 Garden Ave.
PO Box 727
Osburn, ID 83849

USEPA SF
1365193

Response to comment I804-1

See responses to Comment Nos. I54-2 and I58-5.

Response to comment I804-2

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I804-3

While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to addressing these unacceptable risks .

Response to comment I804-4

See response to Comment No. I58-4. In addition EPA is required to evaluate the progress of the cleanup every five years through Five Year Review reports.

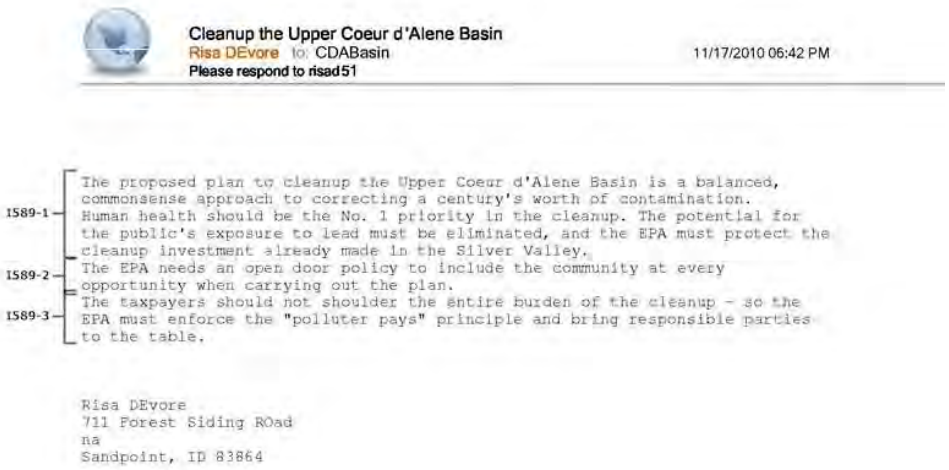
Response to comment I804-5

See responses to Comment Nos. I58-1, I295-1 and I295-3.

Response to comment I804-6

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

DEvore, Risa, I589, Letter 617770



Cleanup the Upper Coeur d'Alene Basin
Risa DEvore to: CDABasin 11/17/2010 06:42 PM
Please respond to risad51

I589-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I589-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I589-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Risa DEvore
711 Forest Siding ROad
na
Sandpoint, ID 83864

617770

Response to comment I589-1

See response to Comment No. I295-1.

Response to comment I589-2

See response to Comment No. I295-2.

Response to comment I589-3

See response to Comment No. I295-3.

DeVries, Fred, I590, Letter 617771

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
chemmin@axs2000.net to: formsubmission 11/17/2010 06:50 PM
Sent by: Chemmin@Axs2000.Net <chemmin=axs2000.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

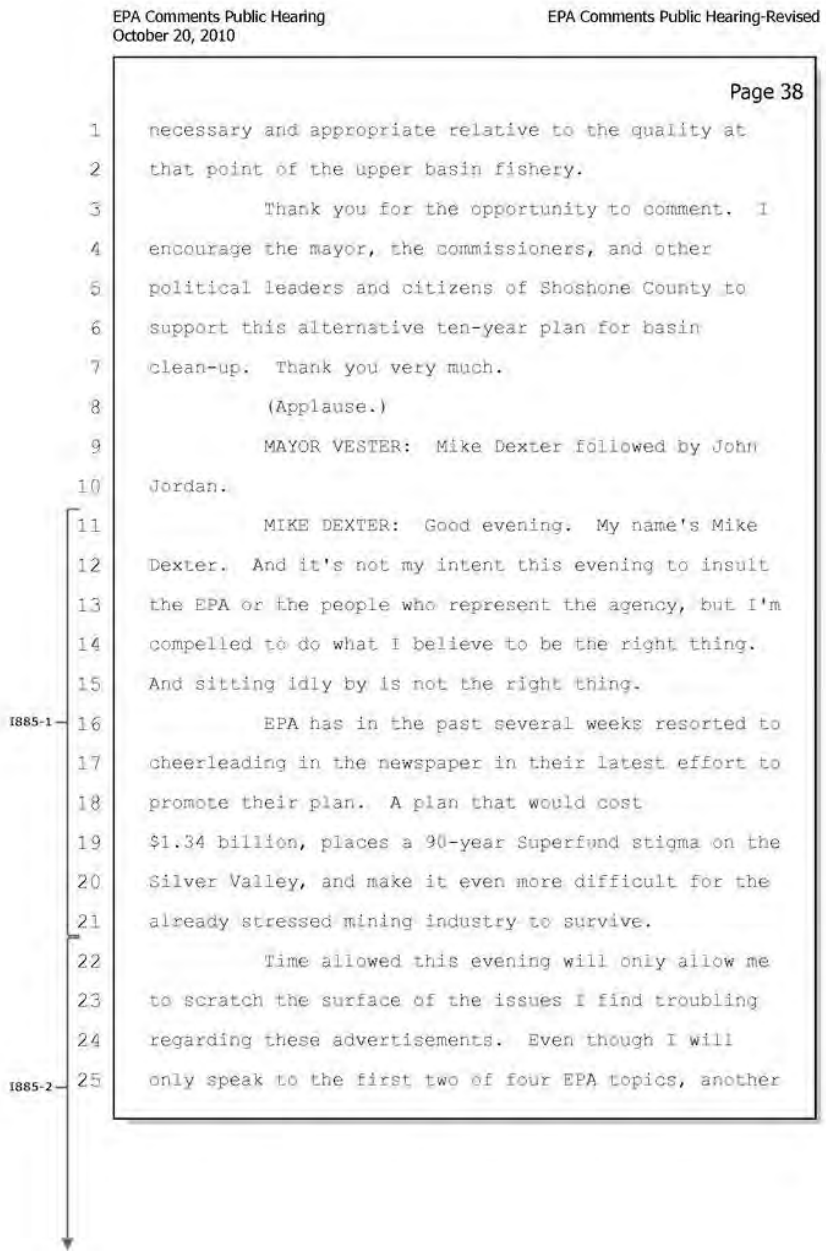
From: Fred DeVries
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I590-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. This has the breath of reality!
Coeur d'Alene Basin Resident: No
Email Address: chemmin@axs2000.net
Mailing Address: Chemmin Mining Consulting, Ltd., 25 Hillendale Road|Chadds Ford|PA|19317|US
Phone Number: (610) 388-2513

617771

Response to comment I590-1

See response to Comment No. I351-1.

Dexter, Mike, I885, Letter 619651-15



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October 20, 2010

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necessary and appropriate relative to the quality at that point of the upper basin fishery.

Thank you for the opportunity to comment. I encourage the mayor, the commissioners, and other political leaders and citizens of Shoshone County to support this alternative ten-year plan for basin clean-up. Thank you very much.

(Applause.)

MAYOR VESTER: Mike Dexter followed by John Jordan.

MIKE DEXTER: Good evening. My name's Mike Dexter. And it's not my intent this evening to insult the EPA or the people who represent the agency, but I'm compelled to do what I believe to be the right thing. And sitting idly by is not the right thing.

I885-1 EPA has in the past several weeks resorted to cheerleading in the newspaper in their latest effort to promote their plan. A plan that would cost $1.34 billion, places a 90-year Superfund stigma on the Silver Valley, and make it even more difficult for the already stressed mining industry to survive.

Time allowed this evening will only allow me to scratch the surface of the issues I find troubling regarding these advertisements. Even though I will

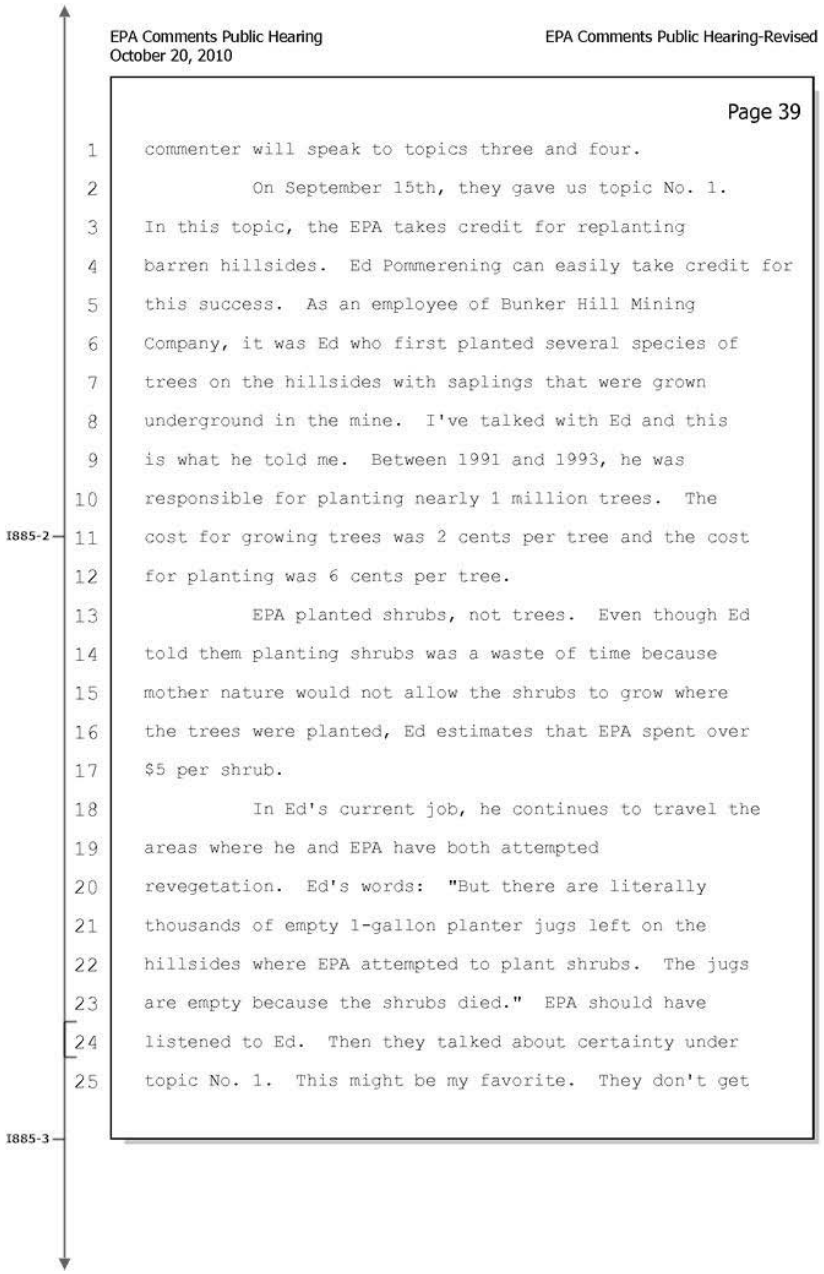
I885-2 only speak to the first two of four EPA topics, another

Response to comment I885-1

See responses to Comment Nos. I58-1, I58-2, and I58-5.

Response to comment I885-2

EPA acknowledges the extensive efforts by Ed Pommerening and the Mining Companies in restoration of the hillsides. This work in combination with EPA's efforts at planting and fertilization finally helped vegetation get established. The end result, and the point EPA was trying to make in the presentation, was to show the significant improvement in the environment that had occurred as a result of these significant efforts.



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commenter will speak to topics three and four.

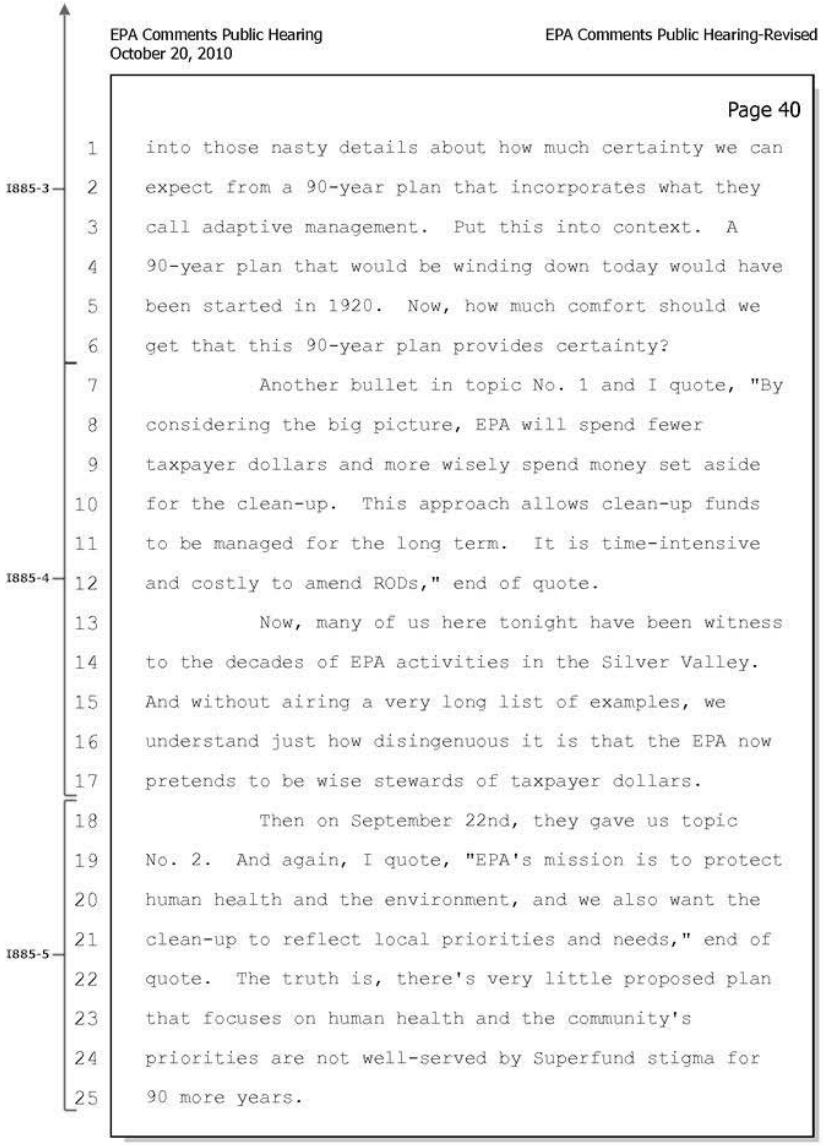
On September 15th, they gave us topic No. 1. In this topic, the EPA takes credit for replanting barren hillsides. Ed Pommerening can easily take credit for this success. As an employee of Bunker Hill Mining Company, it was Ed who first planted several species of trees on the hillsides with saplings that were grown underground in the mine. I've talked with Ed and this is what he told me. Between 1991 and 1993, he was responsible for planting nearly 1 million trees. The cost for growing trees was 2 cents per tree and the cost for planting was 6 cents per tree. I885-2

EPA planted shrubs, not trees. Even though Ed told them planting shrubs was a waste of time because mother nature would not allow the shrubs to grow where the trees were planted, Ed estimates that EPA spent over $5 per shrub.

In Ed's current job, he continues to travel the areas where he and EPA have both attempted revegetation. Ed's words: "But there are literally thousands of empty 1-gallon planter jugs left on the hillsides where EPA attempted to plant shrubs. The jugs are empty because the shrubs died." EPA should have listened to Ed. Then they talked about certainty under topic No. 1. This might be my favorite. They don't get I885-3

Response to comment I885-3

See response to Comment No. I58-1 regarding the duration of the Selected Remedy. Adaptive management is a critical component of the Selected Remedy because it is not possible for physical and chemical conditions to be fully defined and known for this large and complex area. An adaptive management framework provides a methodology to carry out the Selected Remedy in a structured, iterative way. Also see response to Comment No. LJ11-2.



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I885-3 into those nasty details about how much certainty we can
expect from a 90-year plan that incorporates what they
call adaptive management. Put this into context. A
90-year plan that would be winding down today would have
been started in 1920. Now, how much comfort should we
get that this 90-year plan provides certainty?

Another bullet in topic No. 1 and I quote, "By
considering the big picture, EPA will spend fewer
taxpayer dollars and more wisely spend money set aside
for the clean-up. This approach allows clean-up funds
to be managed for the long term. It is time-intensive
I885-4 and costly to amend RODs," end of quote.

Now, many of us here tonight have been witness
to the decades of EPA activities in the Silver Valley.
And without airing a very long list of examples, we
understand just how disingenuous it is that the EPA now
pretends to be wise stewards of taxpayer dollars.

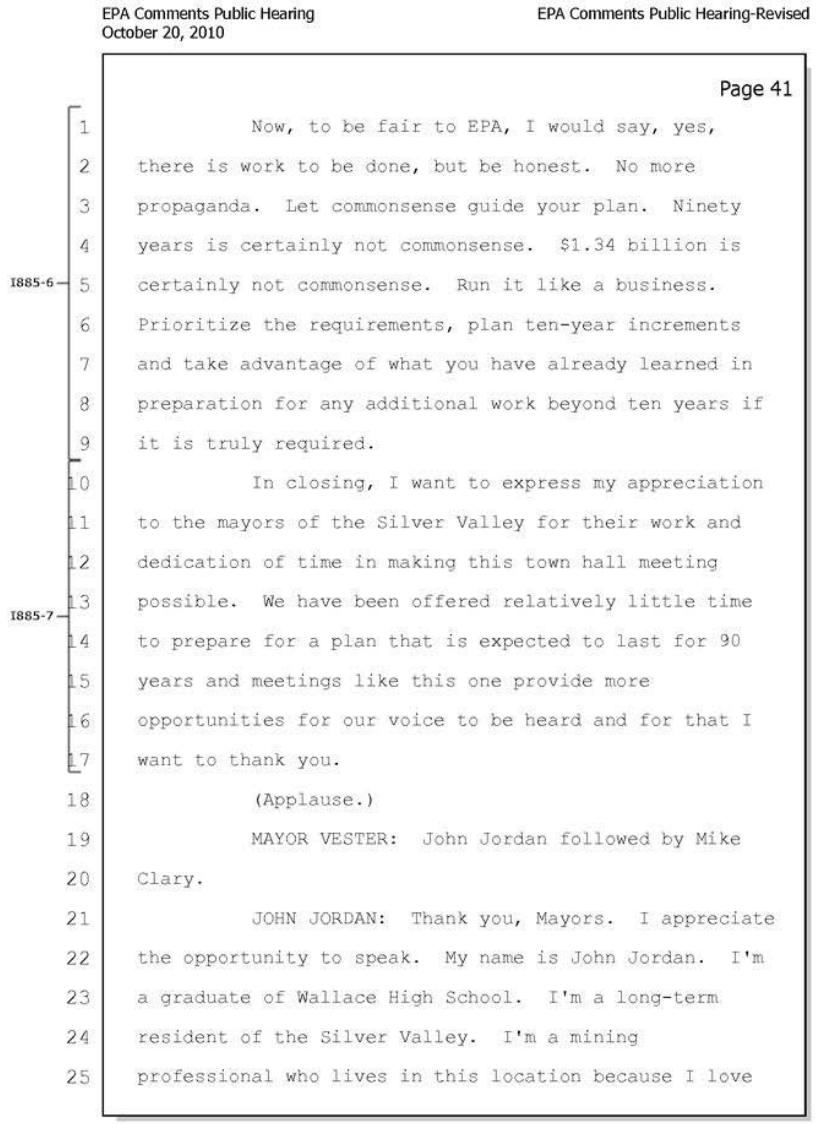
Then on September 22nd, they gave us topic
No. 2. And again, I quote, "EPA's mission is to protect
human health and the environment, and we also want the
I885-5 clean-up to reflect local priorities and needs," end of
quote. The truth is, there's very little proposed plan
that focuses on human health and the community's
priorities are not well-served by Superfund stigma for
90 more years.

Response to comment I885-4

EPA is carefully considering how to maximize the settlement funds while also moving forward with cleanup priorities. See response to Comment No. I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. Also see response to Comment No. 1295-3.

Response to comment I885-5

Regarding human health risks in the Basin, see response to Comment No. I295-1. The Upper Basin Selected Remedy includes an estimated $33.9 million for remedy protection work in the Upper Basin. Remedy protection is intended to protect the existing human health clean soil barriers (e.g., remediated yards and rights-of-way) within Upper Basin communities from tributary flooding and high-precipitation events. In addition to the remedy protection work, cleanup actions that address mine waste contamination within drainage areas accessible for recreational use will protect human health and improve surface water quality. Common recreational activities in the Coeur d'Alene Basin include hiking, fishing, hunting, boating, swimming, and all-terrain-vehicle riding. As noted in the ROD Amendment, Part 3, Section 3.2.4, exposure to lead contamination can cause elevated blood lead levels. EPA has also found that elevated blood lead levels can occur within relatively short exposure periods (such as through recreational exposure to contamination located along the SFCDR, on waste piles, etc.). The Selected Remedy will provide clean surface soil in contaminated areas and reduce particulate lead loading to surface water. In these ways, the Selected Remedy will further reduce the risks people may be exposed to during recreational activities. Regarding effects of the Selected Remedy on the local economy and the duration of the Selected Remedy, see responses to Comment Nos. I54-2 and I58-1.



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Now, to be fair to EPA, I would say, yes, there is work to be done, but be honest. No more propaganda. Let commonsense guide your plan. Ninety years is certainly not commonsense. $1.34 billion is certainly not commonsense. Run it like a business. Prioritize the requirements, plan ten-year increments and take advantage of what you have already learned in preparation for any additional work beyond ten years if it is truly required.

I885-6

In closing, I want to express my appreciation to the mayors of the Silver Valley for their work and dedication of time in making this town hall meeting possible. We have been offered relatively little time to prepare for a plan that is expected to last for 90 years and meetings like this one provide more opportunities for our voice to be heard and for that I want to thank you.

I885-7

(Applause.)

MAYOR VESTER: John Jordan followed by Mike Clary.

JOHN JORDAN: Thank you, Mayors. I appreciate the opportunity to speak. My name is John Jordan. I'm a graduate of Wallace High School. I'm a long-term resident of the Silver Valley. I'm a mining professional who lives in this location because I love

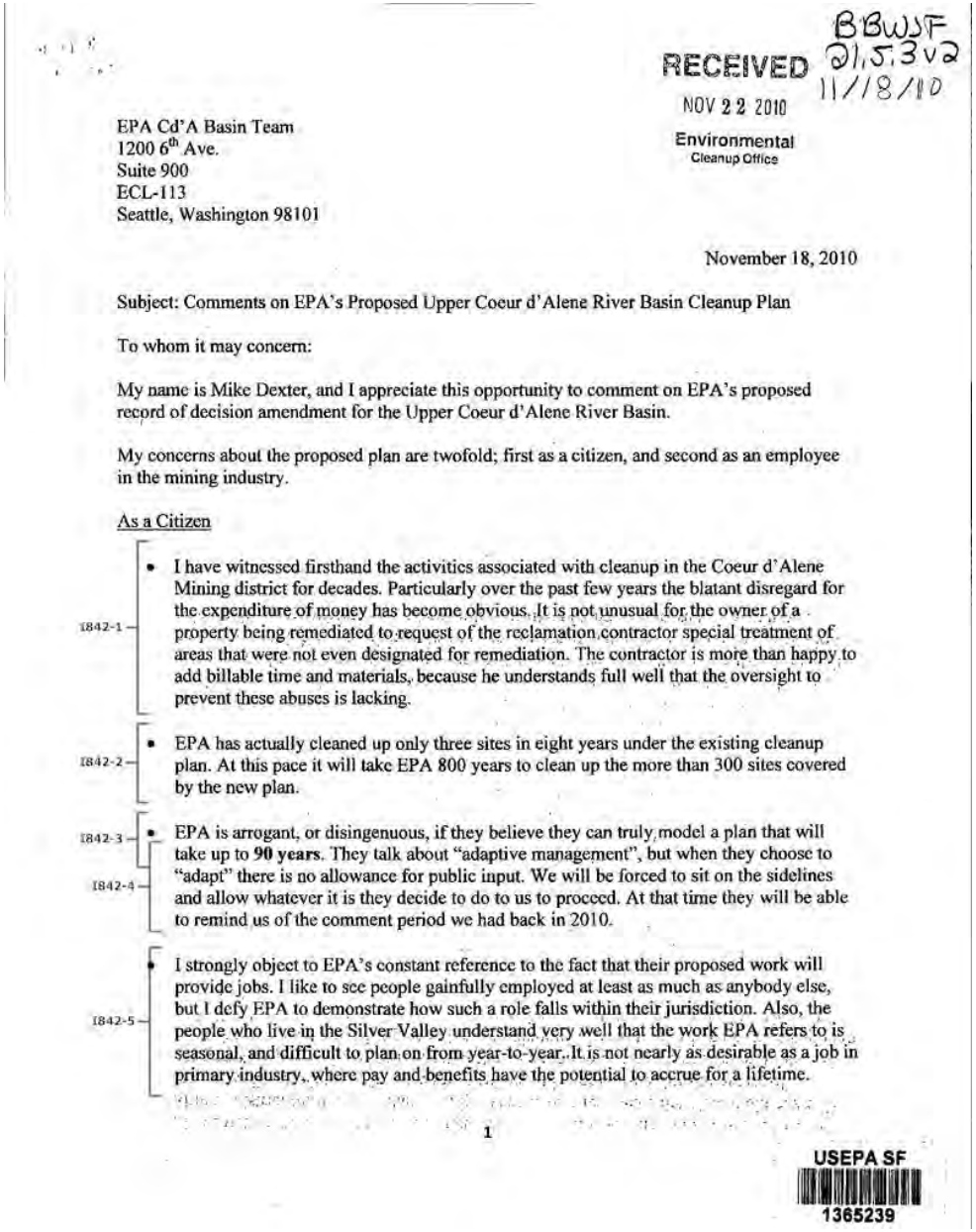
Response to comment I885-6

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I885-7

Thank you for your comments. See response to Comment No. I295-2.

Dexter, Mike, I842, Letter 1365239



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RECEIVED
NOV 22 2010
Environmental
Cleanup Office

EPA Cd'A Basin Team
1200 6th Ave.
Suite 900
ECL-113
Seattle, Washington 98101

November 18, 2010

Subject: Comments on EPA's Proposed Upper Coeur d'Alene River Basin Cleanup Plan

To whom it may concern:

My name is Mike Dexter, and I appreciate this opportunity to comment on EPA's proposed record of decision amendment for the Upper Coeur d'Alene River Basin.

My concerns about the proposed plan are twofold; first as a citizen, and second as an employee in the mining industry.

As a Citizen

I842-1 • I have witnessed firsthand the activities associated with cleanup in the Coeur d'Alene Mining district for decades. Particularly over the past few years the blatant disregard for the expenditure of money has become obvious. It is not unusual for the owner of a property being remediated to request of the reclamation contractor special treatment of areas that were not even designated for remediation. The contractor is more than happy to add billable time and materials, because he understands full well that the oversight to prevent these abuses is lacking.

I842-2 • EPA has actually cleaned up only three sites in eight years under the existing cleanup plan. At this pace it will take EPA 800 years to clean up the more than 300 sites covered by the new plan.

I842-3 • EPA is arrogant, or disingenuous, if they believe they can truly model a plan that will take up to **90 years**. They talk about "adaptive management", but when they choose to "adapt" there is no allowance for public input. We will be forced to sit on the sidelines and allow whatever it is they decide to do to us to proceed. At that time they will be able to remind us of the comment period we had back in 2010.

I842-4

I842-5 • I strongly object to EPA's constant reference to the fact that their proposed work will provide jobs. I like to see people gainfully employed at least as much as anybody else, but I defy EPA to demonstrate how such a role falls within their jurisdiction. Also, the people who live in the Silver Valley understand very well that the work EPA refers to is seasonal, and difficult to plan on from year-to-year. It is not nearly as desirable as a job in primary industry, where pay and benefits have the potential to accrue for a lifetime.

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1365239

Response to comment I842-1

The yards cleanup program is intended to address the human health risk posed by mining related contaminated. To the extent that the commenter or others are aware of specific instances where a contractor working on the yards cleanup program billed the government for services not related to the human health cleanup please let us know.

Response to comment I842-2

See response to Comment No. I58-1.

Response to comment I842-3

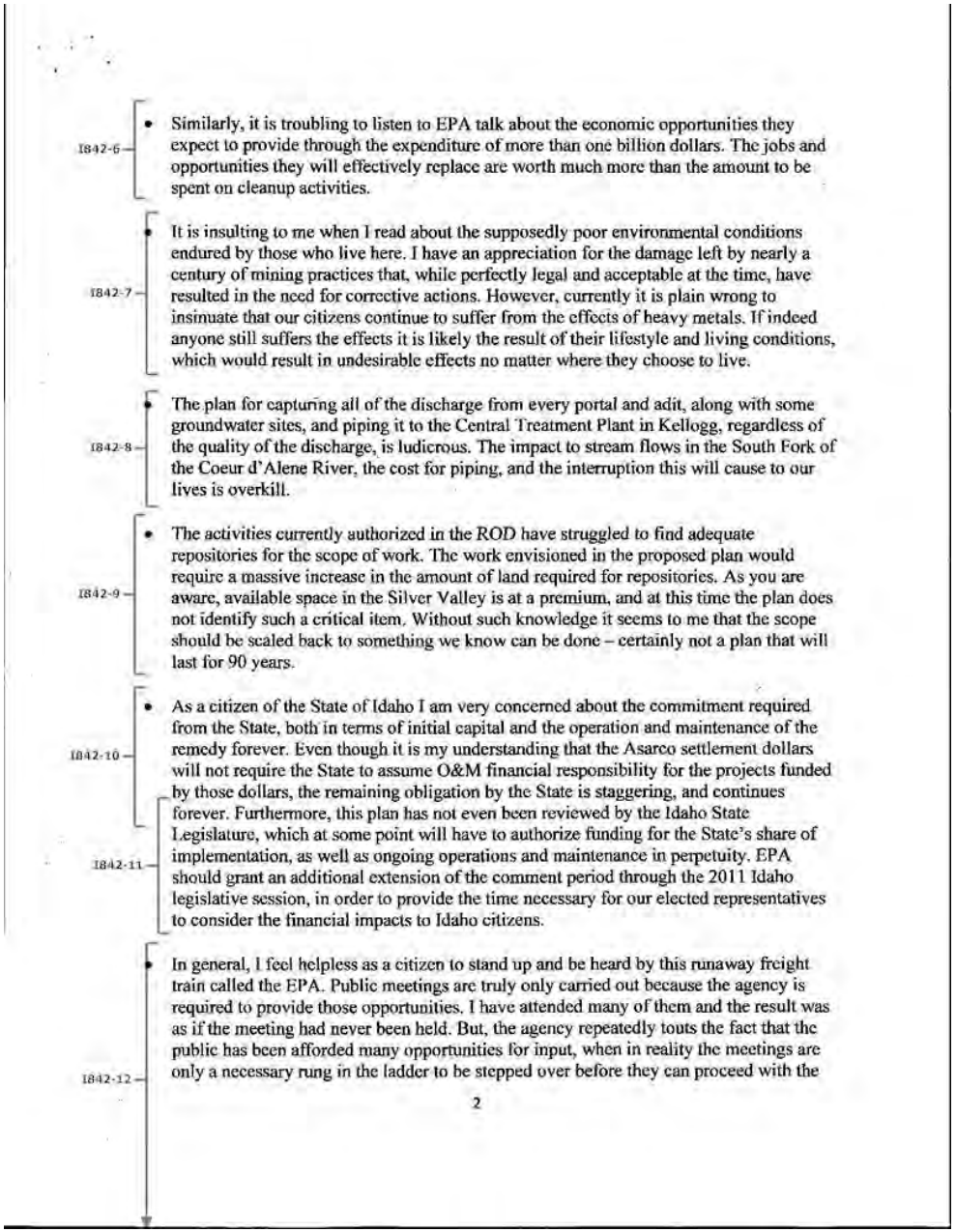
See response to Comment No. I58-1.

Response to comment I842-4

See responses to Comment Nos. LJ11-2 and I295-2.

Response to comment I842-5

See response to Comment No. LC32-2.



I842-6 • Similarly, it is troubling to listen to EPA talk about the economic opportunities they expect to provide through the expenditure of more than one billion dollars. The jobs and opportunities they will effectively replace are worth much more than the amount to be spent on cleanup activities.

I842-7 • It is insulting to me when I read about the supposedly poor environmental conditions endured by those who live here. I have an appreciation for the damage left by nearly a century of mining practices that, while perfectly legal and acceptable at the time, have resulted in the need for corrective actions. However, currently it is plain wrong to insinuate that our citizens continue to suffer from the effects of heavy metals. If indeed anyone still suffers the effects it is likely the result of their lifestyle and living conditions, which would result in undesirable effects no matter where they choose to live.

I842-8 • The plan for capturing all of the discharge from every portal and adit, along with some groundwater sites, and piping it to the Central Treatment Plant in Kellogg, regardless of the quality of the discharge, is ludicrous. The impact to stream flows in the South Fork of the Coeur d'Alene River, the cost for piping, and the interruption this will cause to our lives is overkill.

I842-9 • The activities currently authorized in the ROD have struggled to find adequate repositories for the scope of work. The work envisioned in the proposed plan would require a massive increase in the amount of land required for repositories. As you are aware, available space in the Silver Valley is at a premium, and at this time the plan does not identify such a critical item. Without such knowledge it seems to me that the scope should be scaled back to something we know can be done – certainly not a plan that will last for 90 years.

I842-10 • As a citizen of the State of Idaho I am very concerned about the commitment required from the State, both in terms of initial capital and the operation and maintenance of the remedy forever. Even though it is my understanding that the Asarco settlement dollars will not require the State to assume O&M financial responsibility for the projects funded by those dollars, the remaining obligation by the State is staggering, and continues forever. Furthermore, this plan has not even been reviewed by the Idaho State Legislature, which at some point will have to authorize funding for the State's share of implementation, as well as ongoing operations and maintenance in perpetuity. EPA should grant an additional extension of the comment period through the 2011 Idaho legislative session, in order to provide the time necessary for our elected representatives to consider the financial impacts to Idaho citizens.

I842-11

I842-12 • In general, I feel helpless as a citizen to stand up and be heard by this runaway freight train called the EPA. Public meetings are truly only carried out because the agency is required to provide those opportunities. I have attended many of them and the result was as if the meeting had never been held. But, the agency repeatedly touts the fact that the public has been afforded many opportunities for input, when in reality the meetings are only a necessary rung in the ladder to be stepped over before they can proceed with the

2

Response to comment I842-6
See responses to Comment Nos. I54-2, I58-5, and I58-2.

Response to comment I842-7
See response to Comment No. I295-1.

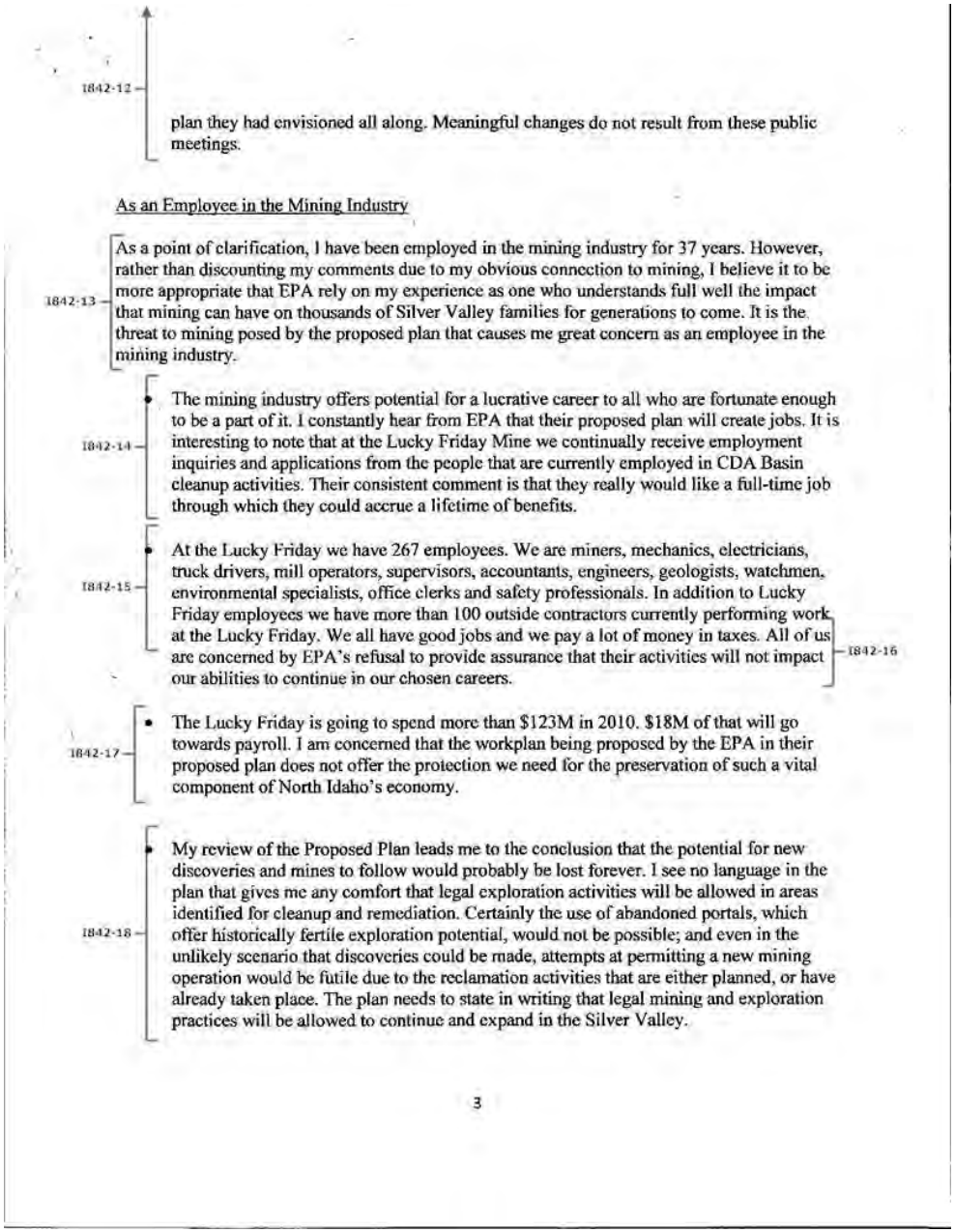
Response to comment I842-8
The Selected Remedy does not include the capture of all of the discharge from every portal and adit; only those discharges that exceed water quality standards and are resulting in impaired water quality in the SFCDR and its tributaries. The highest concentration discharges will be addressed first. During this initial period of implementation, water quality will be monitored and if needed, additional actions will be taken to achieve remedial action objectives. The impact to stream flows is expected to be minimal (see responses to comment I54-8 and I54-9), and conveyance to the Central Treatment Plant for treatment has been shown to be the lowest cost option for most sites (EPA, August 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*).

Response to comment I842-9
See response to Comment No. I58-1 regarding the reduction in scope of the ROD Amendment compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. I54-3 regarding repositories.

Response to comment I842-10
As noted in the comment current interpretation is the State is not required to assume O&M for settlement dollars. This includes funding from both the Asarco and Hecla settlements. The State would be required to enter into a State Superfund contract prior to assuming any O&M responsibilities that are associated with the expenditure of other appropriated funds for cleanup. Also see responses to Comment Nos. I58-1 and I295-3.

Response to comment I842-11
See responses to Comment Nos. LJ39-5 and I54-6.

Response to comment I842-12
See response to Comment No. I295-2.



I842-12

plan they had envisioned all along. Meaningful changes do not result from these public meetings.

As an Employee in the Mining Industry

I842-13

As a point of clarification, I have been employed in the mining industry for 37 years. However, rather than discounting my comments due to my obvious connection to mining, I believe it to be more appropriate that EPA rely on my experience as one who understands full well the impact that mining can have on thousands of Silver Valley families for generations to come. It is the threat to mining posed by the proposed plan that causes me great concern as an employee in the mining industry.

I842-14

- The mining industry offers potential for a lucrative career to all who are fortunate enough to be a part of it. I constantly hear from EPA that their proposed plan will create jobs. It is interesting to note that at the Lucky Friday Mine we continually receive employment inquiries and applications from the people that are currently employed in CDA Basin cleanup activities. Their consistent comment is that they really would like a full-time job through which they could accrue a lifetime of benefits.

I842-15

- At the Lucky Friday we have 267 employees. We are miners, mechanics, electricians, truck drivers, mill operators, supervisors, accountants, engineers, geologists, watchmen, environmental specialists, office clerks and safety professionals. In addition to Lucky Friday employees we have more than 100 outside contractors currently performing work at the Lucky Friday. We all have good jobs and we pay a lot of money in taxes. All of us are concerned by EPA's refusal to provide assurance that their activities will not impact our abilities to continue in our chosen careers.

I842-16

I842-17

- The Lucky Friday is going to spend more than $123M in 2010. $18M of that will go towards payroll. I am concerned that the workplan being proposed by the EPA in their proposed plan does not offer the protection we need for the preservation of such a vital component of North Idaho's economy.

I842-18

- My review of the Proposed Plan leads me to the conclusion that the potential for new discoveries and mines to follow would probably be lost forever. I see no language in the plan that gives me any comfort that legal exploration activities will be allowed in areas identified for cleanup and remediation. Certainly the use of abandoned portals, which offer historically fertile exploration potential, would not be possible; and even in the unlikely scenario that discoveries could be made, attempts at permitting a new mining operation would be futile due to the reclamation activities that are either planned, or have already taken place. The plan needs to state in writing that legal mining and exploration practices will be allowed to continue and expand in the Silver Valley.

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Response to comment I842-13

See response to Comment No. I58-5.

Response to comment I842-14

See responses to Comment No. I58-5 and LC32-2.

Response to comment I842-15

Thank you for your comment.

Response to comment I842-16

See response to Comment No. I58-5.

Response to comment I842-17

See response to Comment No. I58-5.

Response to comment I842-18

See response to Comment No. I58-5.

In closing, I respectfully request that EPA consider an alternative ten-year plan that has been proposed. This plan:

- Would cost only $150 - $175 million, compared to EPA's plan which, in real dollars, could cost as much as $5.4 billion.
- Is based on actual data, instead of relying on EPA's flawed predictive model, as recommended by the National Academy of Sciences.
- Includes remedy protection in towns and populated areas.
- Includes a $2 million study to support flood control in the Silver Valley.
- Allows multiple opportunities for meaningful public input.
- Focuses on priority sources of zinc loading above Wallace in Canyon Creek and Nine Mile Creek, and in the "box", as recommended by the National Academy of Sciences. I842-19
- Will not dewater the Coeur d'Alene River.
- Establishes achievable goals and benchmarks.
- Will not require massive treatment plant upgrades.
- Respects existing private property rights, water rights and states' rights.
- Protects current and future economic development, including mining and land-use opportunities in the Silver Valley.
- Requires no additional repositories.
- Improves fisheries through site-specific actions and proven technologies.
- Improves water quality standards more quickly and at less cost.
- Is better for the Silver Valley, its residents, and for Idaho.
- Is a better way than the needlessly expensive, multi-generational plan proposed by EPA.

Sincerely,

Mike Dexter
155 King Street
Wallace, Idaho 83873

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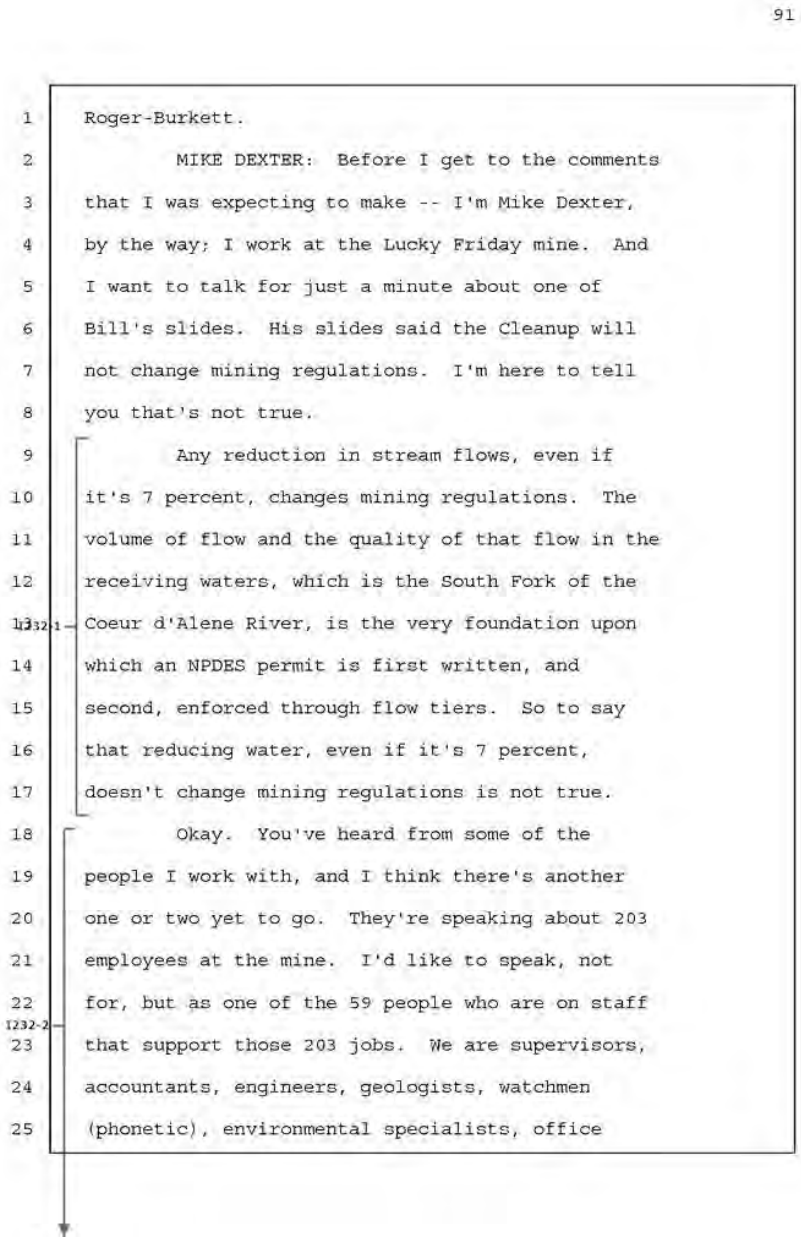
Response to comment I842-19

See response to Comment No. I474-2.

Dexter, Mike, I232, Letter 610097-27



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Roger-Burkett.

MIKE DEXTER: Before I get to the comments that I was expecting to make -- I'm Mike Dexter, by the way; I work at the Lucky Friday mine. And I want to talk for just a minute about one of Bill's slides. His slides said the Cleanup will not change mining regulations. I'm here to tell you that's not true.

Any reduction in stream flows, even if it's 7 percent, changes mining regulations. The volume of flow and the quality of that flow in the receiving waters, which is the South Fork of the Coeur d'Alene River, is the very foundation upon which an NPDES permit is first written, and second, enforced through flow tiers. So to say that reducing water, even if it's 7 percent, doesn't change mining regulations is not true.

I232-1

Okay. You've heard from some of the people I work with, and I think there's another one or two yet to go. They're speaking about 203 employees at the mine. I'd like to speak, not for, but as one of the 59 people who are on staff that support those 203 jobs. We are supervisors, accountants, engineers, geologists, watchmen (phonetic), environmental specialists, office

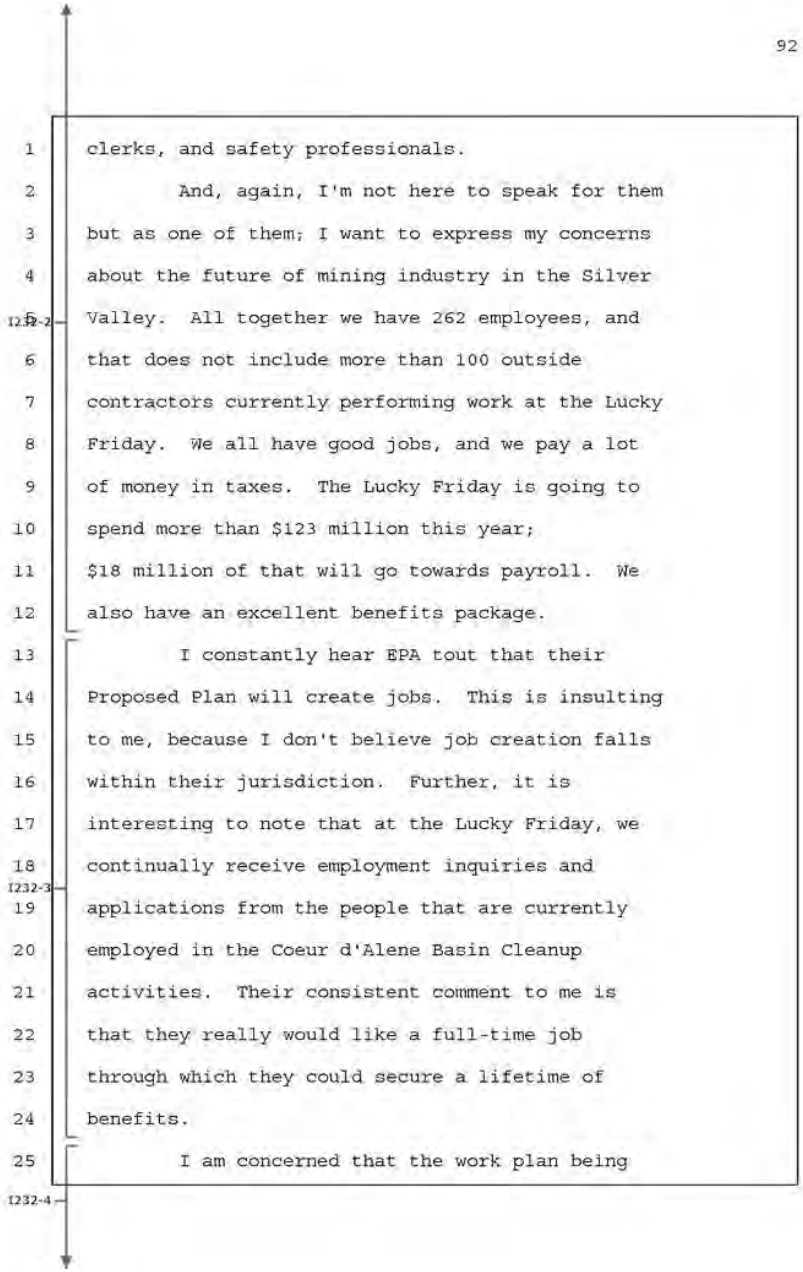
I232-2

Response to comment I232-1

See response to comment I54-8 regarding estimated reductions in stream flows. The comment is accurate in that if stream flows are reduced by 7 percent during low flow times of the year, there will be a minor impact to NPDES permitted dischargers because that 7 percent difference may result in a lower flow tier applying to their discharge, and therefore a lower concentration or mass of a certain parameter, or parameters, that is acceptable for discharge. However, this estimated reduction in flow of 7 percent is not considered to be significant given that the natural variability of dry season flows from year to year averages 21 percent.

Response to comment I232-2

See response to Comment No. I58-5.



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clerks, and safety professionals.

And, again, I'm not here to speak for them but as one of them; I want to express my concerns about the future of mining industry in the Silver Valley. All together we have 262 employees, and that does not include more than 100 outside contractors currently performing work at the Lucky Friday. We all have good jobs, and we pay a lot of money in taxes. The Lucky Friday is going to spend more than $123 million this year; $18 million of that will go towards payroll. We also have an excellent benefits package.

I constantly hear EPA tout that their Proposed Plan will create jobs. This is insulting to me, because I don't believe job creation falls within their jurisdiction. Further, it is interesting to note that at the Lucky Friday, we continually receive employment inquiries and applications from the people that are currently employed in the Coeur d'Alene Basin Cleanup activities. Their consistent comment to me is that they really would like a full-time job through which they could secure a lifetime of benefits.

I am concerned that the work plan being

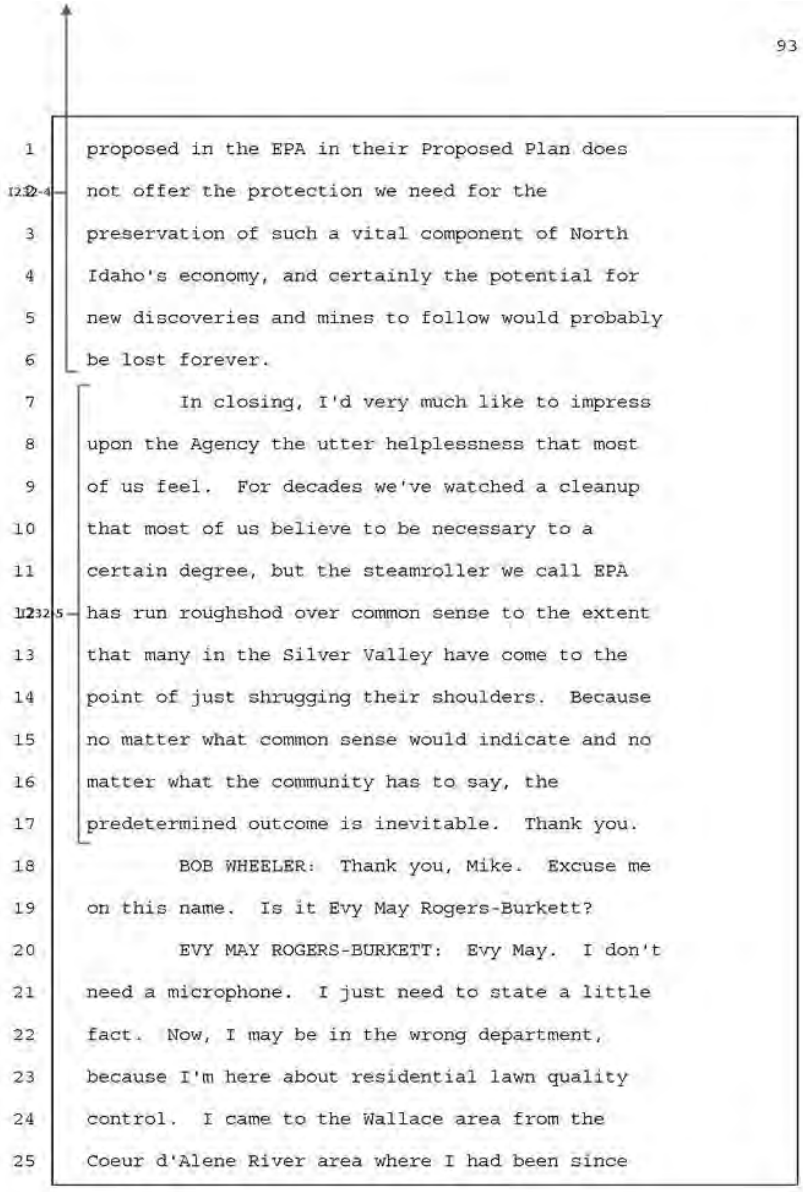
I232-2 I232-3 I232-4

Response to comment I232-3

See response to Comment No. LC32-2.

Response to comment I232-4

See response to Comment No. I58-5.



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proposed in the EPA in their Proposed Plan does not offer the protection we need for the preservation of such a vital component of North Idaho's economy, and certainly the potential for new discoveries and mines to follow would probably be lost forever.

I232-4

In closing, I'd very much like to impress upon the Agency the utter helplessness that most of us feel. For decades we've watched a cleanup that most of us believe to be necessary to a certain degree, but the steamroller we call EPA has run roughshod over common sense to the extent that many in the Silver Valley have come to the point of just shrugging their shoulders. Because no matter what common sense would indicate and no matter what the community has to say, the predetermined outcome is inevitable. Thank you.

I232-5

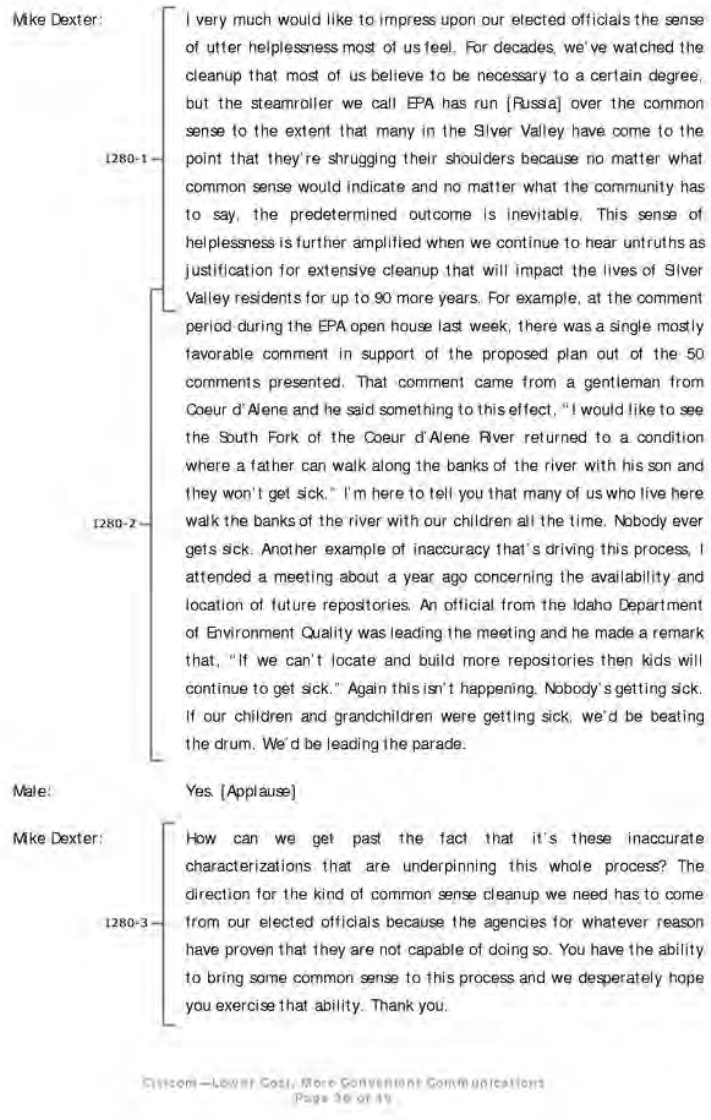
BOB WHEELER: Thank you, Mike. Excuse me on this name. Is it Evy May Rogers-Burkett?

EVY MAY ROGERS-BURKETT: Evy May. I don't need a microphone. I just need to state a little fact. Now, I may be in the wrong department, because I'm here about residential lawn quality control. I came to the Wallace area from the Coeur d'Alene River area where I had been since

Response to comment I232-5

EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. See response to Comment No. I295-2.

Dexter, Mike, I280, Letter 616015-44



Mike Dexter: I very much would like to impress upon our elected officials the sense of utter helplessness most of us feel. For decades, we've watched the cleanup that most of us believe to be necessary to a certain degree, but the steamroller we call EPA has run [Russia] over the common sense to the extent that many in the Silver Valley have come to the point that they're shrugging their shoulders because no matter what common sense would indicate and no matter what the community has to say, the predetermined outcome is inevitable. This sense of helplessness is further amplified when we continue to hear untruths as justification for extensive cleanup that will impact the lives of Silver Valley residents for up to 90 more years. For example, at the comment period during the EPA open house last week, there was a single mostly favorable comment in support of the proposed plan out of the 50 comments presented. That comment came from a gentleman from Coeur d'Alene and he said something to this effect, "I would like to see the South Fork of the Coeur d'Alene River returned to a condition where a father can walk along the banks of the river with his son and they won't get sick." I'm here to tell you that many of us who live here walk the banks of the river with our children all the time. Nobody ever gets sick. Another example of inaccuracy that's driving this process, I attended a meeting about a year ago concerning the availability and location of future repositories. An official from the Idaho Department of Environment Quality was leading the meeting and he made a remark that, "If we can't locate and build more repositories then kids will continue to get sick." Again this isn't happening. Nobody's getting sick. If our children and grandchildren were getting sick, we'd be beating the drum. We'd be leading the parade.

I280-1

I280-2

Male: Yes. [Applause]

Mike Dexter: How can we get past the fact that it's these inaccurate characterizations that are underpinning this whole process? The direction for the kind of common sense cleanup we need has to come from our elected officials because the agencies for whatever reason have proven that they are not capable of doing so. You have the ability to bring some common sense to this process and we desperately hope you exercise that ability. Thank you.

I280-3

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Response to comment I280-1

See responses to Comment Nos. I295-2 and I58-1.

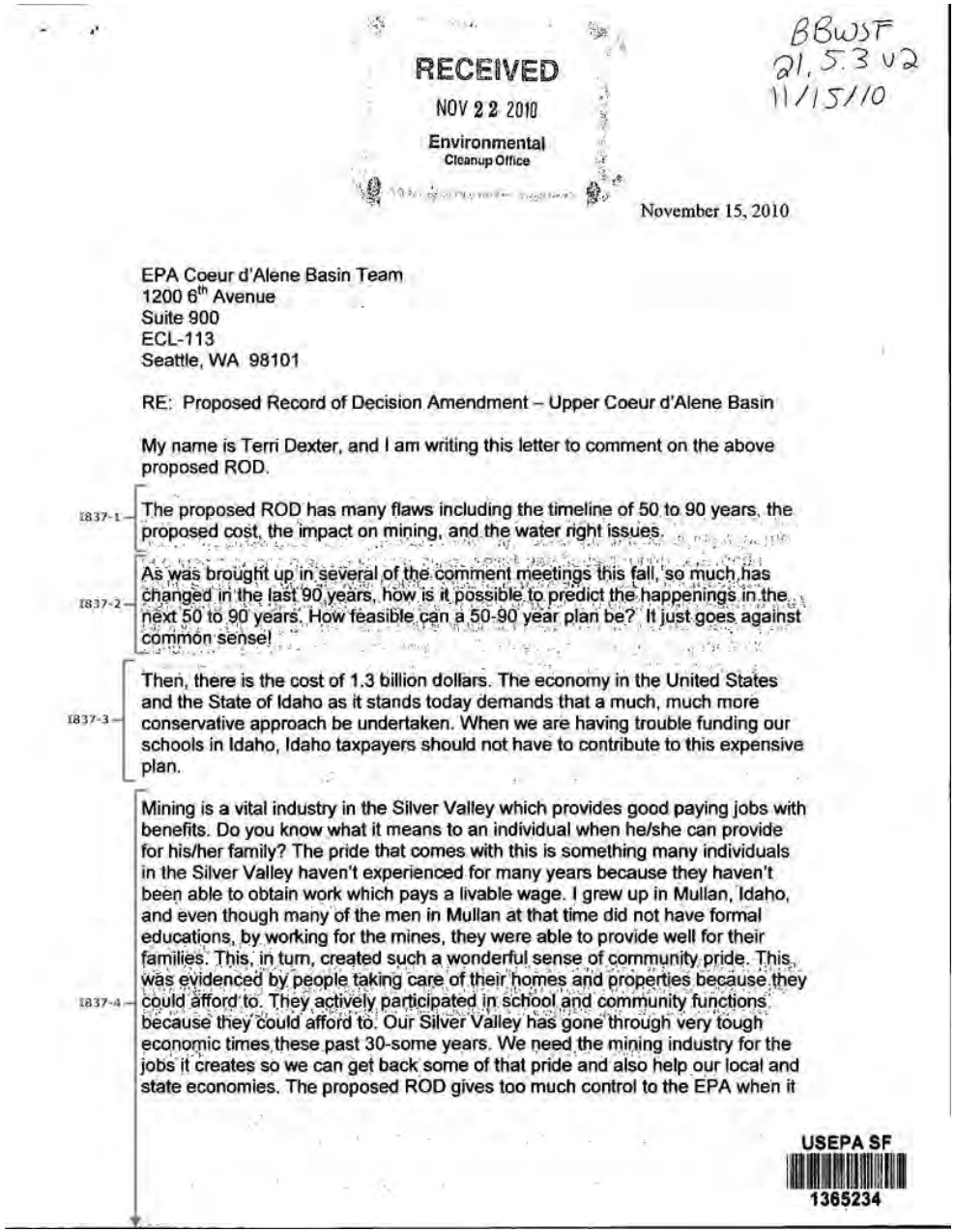
Response to comment I280-2

Regarding risks to human health, see response to Comment No. I295-1.

Response to comment I280-3

Comment noted.

Dexter, Terri, I837, Letter 1365234



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November 15, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene Basin

My name is Terri Dexter, and I am writing this letter to comment on the above proposed ROD.

I837-1 The proposed ROD has many flaws including the timeline of 50 to 90 years, the proposed cost, the impact on mining, and the water right issues.

I837-2 As was brought up in several of the comment meetings this fall, so much has changed in the last 90 years, how is it possible to predict the happenings in the next 50 to 90 years. How feasible can a 50-90 year plan be? It just goes against common sense!

I837-3 Then, there is the cost of 1.3 billion dollars. The economy in the United States and the State of Idaho as it stands today demands that a much, much more conservative approach be undertaken. When we are having trouble funding our schools in Idaho, Idaho taxpayers should not have to contribute to this expensive plan.

I837-4 Mining is a vital industry in the Silver Valley which provides good paying jobs with benefits. Do you know what it means to an individual when he/she can provide for his/her family? The pride that comes with this is something many individuals in the Silver Valley haven't experienced for many years because they haven't been able to obtain work which pays a livable wage. I grew up in Mullan, Idaho, and even though many of the men in Mullan at that time did not have formal educations, by working for the mines, they were able to provide well for their families. This, in turn, created such a wonderful sense of community pride. This was evidenced by people taking care of their homes and properties because they could afford to. They actively participated in school and community functions because they could afford to. Our Silver Valley has gone through very tough economic times these past 30-some years. We need the mining industry for the jobs it creates so we can get back some of that pride and also help our local and state economies. The proposed ROD gives too much control to the EPA when it

USEPA SF
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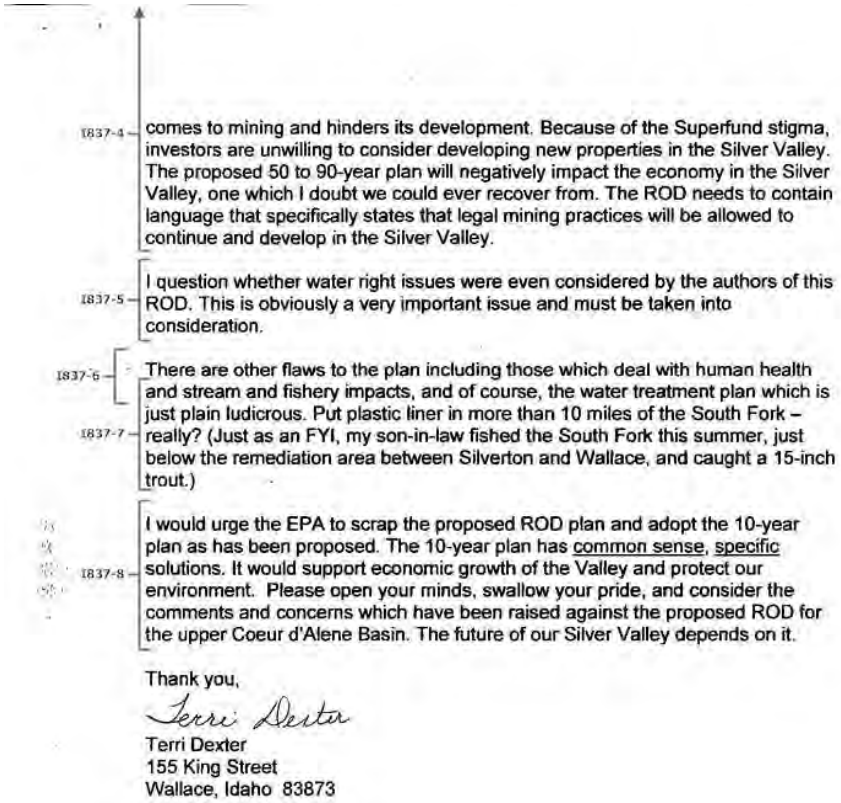
Response to comment I837-1
See responses to Comment Nos. I58-1, I58-2, I58-5, and SA4-12.

Response to comment I837-2
See response to Comment No. I58-1.

Response to comment I837-3
See response to Comment No. I58-2.

Response to comment I837-4
See responses to Comment Nos. I58-1 and I58-5.



I837-4 comes to mining and hinders its development. Because of the Superfund stigma, investors are unwilling to consider developing new properties in the Silver Valley. The proposed 50 to 90-year plan will negatively impact the economy in the Silver Valley, one which I doubt we could ever recover from. The ROD needs to contain language that specifically states that legal mining practices will be allowed to continue and develop in the Silver Valley.

I837-5 I question whether water right issues were even considered by the authors of this ROD. This is obviously a very important issue and must be taken into consideration.

I837-6 There are other flaws to the plan including those which deal with human health and stream and fishery impacts, and of course, the water treatment plan which is just plain ludicrous. Put plastic liner in more than 10 miles of the South Fork –

I837-7 really? (Just as an FYI, my son-in-law fished the South Fork this summer, just below the remediation area between Silverton and Wallace, and caught a 15-inch trout.)

I837-8 I would urge the EPA to scrap the proposed ROD plan and adopt the 10-year plan as has been proposed. The 10-year plan has common sense, specific solutions. It would support economic growth of the Valley and protect our environment. Please open your minds, swallow your pride, and consider the comments and concerns which have been raised against the proposed ROD for the upper Coeur d'Alene Basin. The future of our Silver Valley depends on it.

Thank you,

Terri Dexter

Terri Dexter
155 King Street
Wallace, Idaho 83873

Response to comment I837-5

See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I837-6

The comment does not state what specific "flaws" are of concern. The EPA Proposed Plan was carefully developed in a manner consistent with the National Contingency Plan (NCP), as required by CERCLA. EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

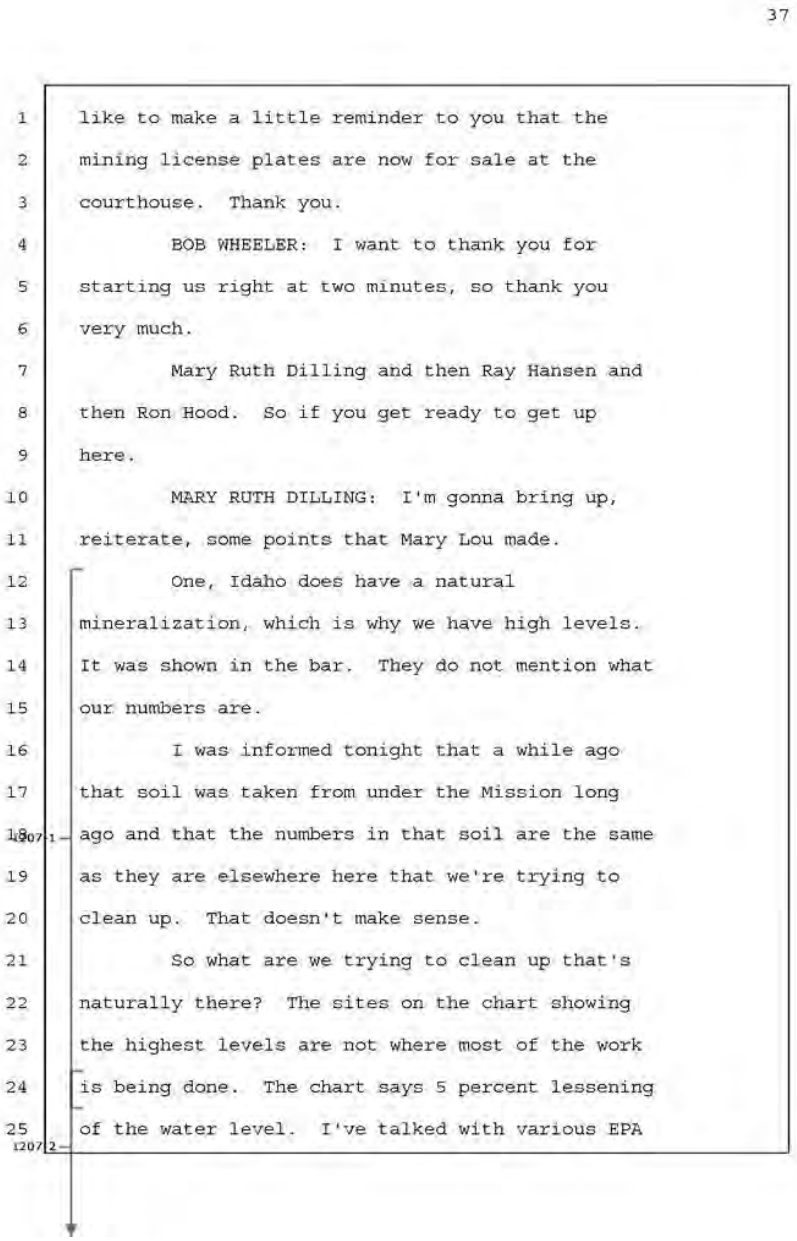
Response to comment I837-7

See response to Comment No. I828-10.

Response to comment I837-8

See response to Comment No. I474-2.

Dilling, Mary Ruth, I207, Letter 610097-2



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like to make a little reminder to you that the mining license plates are now for sale at the courthouse. Thank you.

BOB WHEELER: I want to thank you for starting us right at two minutes, so thank you very much.

Mary Ruth Dilling and then Ray Hansen and then Ron Hood. So if you get ready to get up here.

MARY RUTH DILLING: I'm gonna bring up, reiterate, some points that Mary Lou made.

One, Idaho does have a natural mineralization, which is why we have high levels. It was shown in the bar. They do not mention what our numbers are.

I was informed tonight that a while ago that soil was taken from under the Mission long ago and that the numbers in that soil are the same as they are elsewhere here that we're trying to clean up. That doesn't make sense.

So what are we trying to clean up that's naturally there? The sites on the chart showing the highest levels are not where most of the work is being done. The chart says 5 percent lessening of the water level. I've talked with various EPA

I207-1

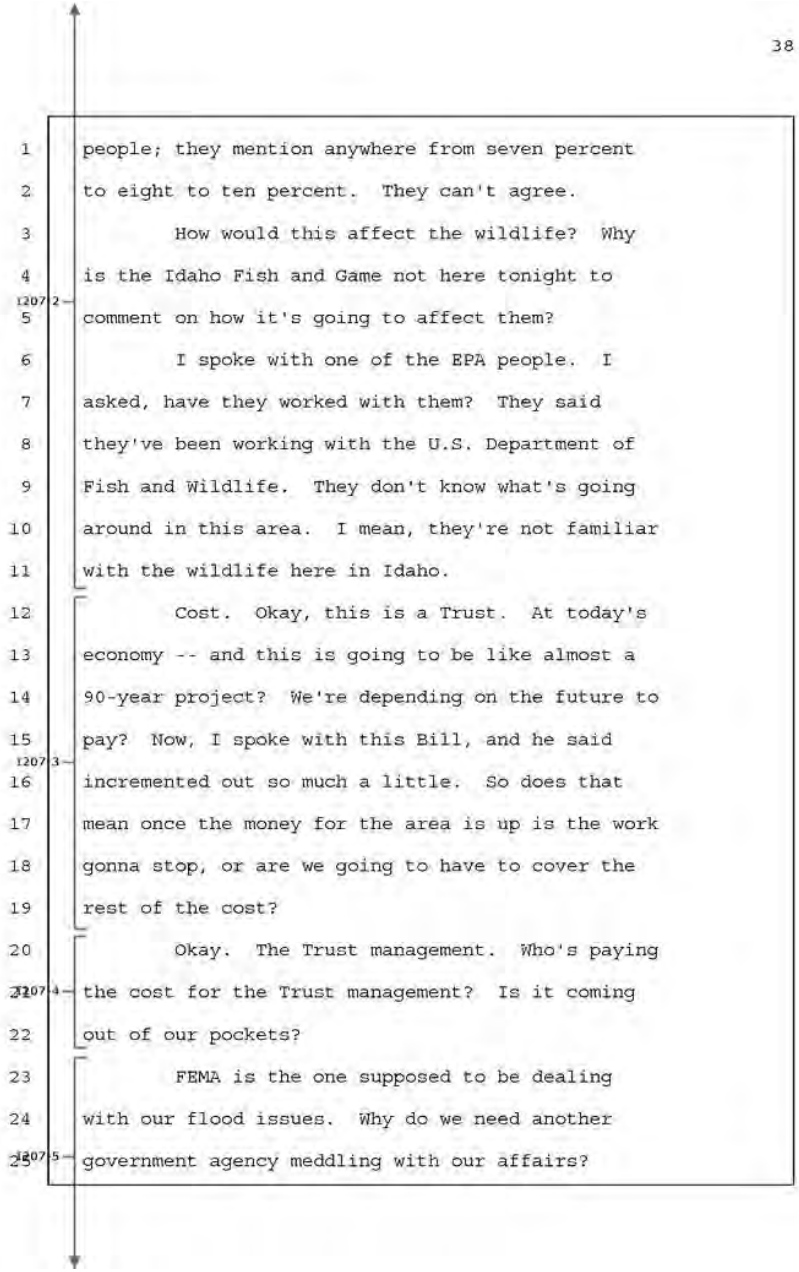
I207-2

Response to comment I207-1

See response to Comment No. LC33-8.

Response to comment I207-2

See response to comments LC33-10 and I54-8. The Selected Remedy is not anticipated to have a detrimental effect on fish and wildlife; rather the Selected Remedy is expected to reduce contaminant concentrations in soil, sediments, and surface water, thereby creating an improved habitat for fish and wildlife.



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people; they mention anywhere from seven percent to eight to ten percent. They can't agree.

How would this affect the wildlife? Why is the Idaho Fish and Game not here tonight to I207-2 comment on how it's going to affect them?

I spoke with one of the EPA people. I asked, have they worked with them? They said they've been working with the U.S. Department of Fish and Wildlife. They don't know what's going around in this area. I mean, they're not familiar with the wildlife here in Idaho.

Cost. Okay, this is a Trust. At today's economy -- and this is going to be like almost a 90-year project? We're depending on the future to pay? Now, I spoke with this Bill, and he said I207-3 incremented out so much a little. So does that mean once the money for the area is up is the work gonna stop, or are we going to have to cover the rest of the cost?

Okay. The Trust management. Who's paying I207-4 the cost for the Trust management? Is it coming out of our pockets?

FEMA is the one supposed to be dealing with our flood issues. Why do we need another I207-5 government agency meddling with our affairs?

Response to comment I207-3

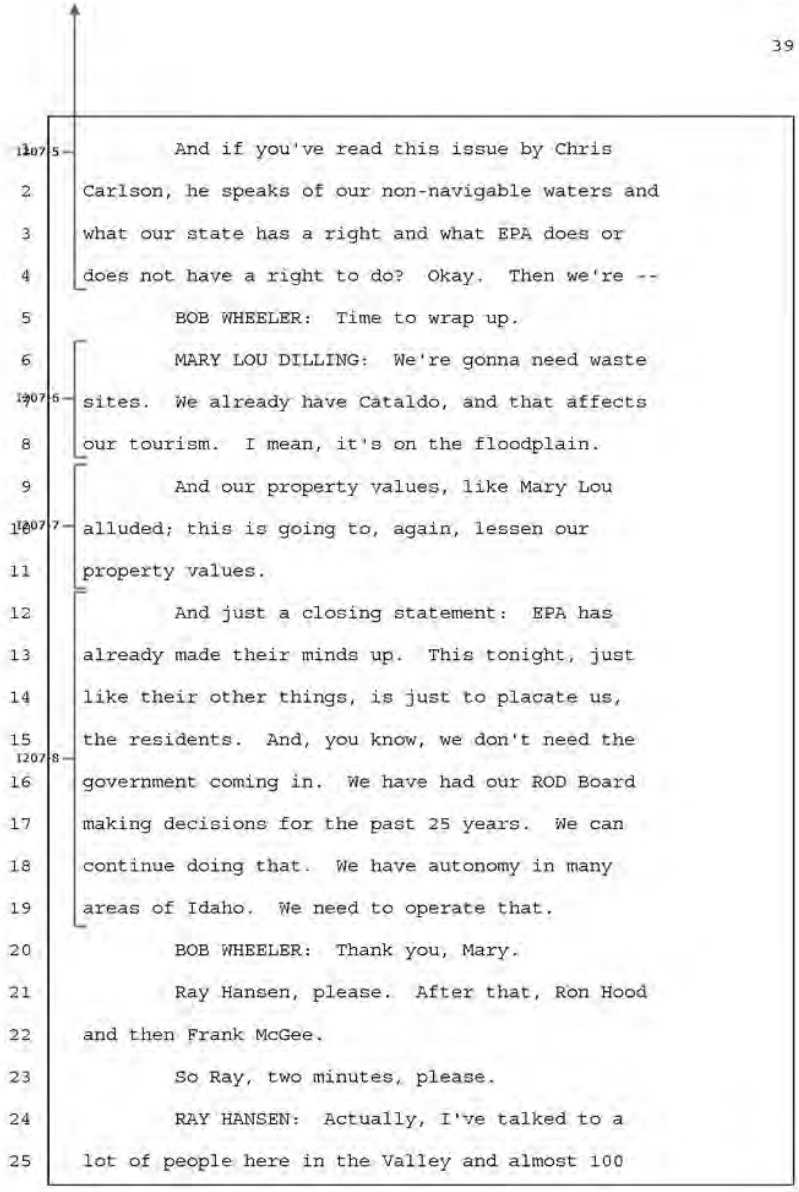
See response to Comment No. I295-3.

Response to comment I207-4

See response to Comment No. I691-25.

Response to comment I207-5

Comprehensive flood control is a complex multi-jurisdictional issue that exceeds the expertise and regulatory authority of EPA's cleanup program. EPA is therefore committed to working with local, state, and federal entities with an interest in SFCDR flood issues and, consistent with EPA's authority, to help craft solutions.



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I207-5 And if you've read this issue by Chris Carlson, he speaks of our non-navigable waters and what our state has a right and what EPA does or does not have a right to do? Okay. Then we're --

BOB WHEELER: Time to wrap up.

MARY LOU DILLING: We're gonna need waste I207-6 sites. We already have Cataldo, and that affects our tourism. I mean, it's on the floodplain.

And our property values, like Mary Lou I207-7 alluded; this is going to, again, lessen our property values.

And just a closing statement: EPA has already made their minds up. This tonight, just like their other things, is just to placate us, the residents. And, you know, we don't need the I207-8 government coming in. We have had our ROD Board making decisions for the past 25 years. We can continue doing that. We have autonomy in many areas of Idaho. We need to operate that.

BOB WHEELER: Thank you, Mary.

Ray Hansen, please. After that, Ron Hood and then Frank McGee.

So Ray, two minutes, please.

RAY HANSEN: Actually, I've talked to a lot of people here in the Valley and almost 100

Response to comment I207-6

See responses to Comment Nos. I54-3 and LC21-9.

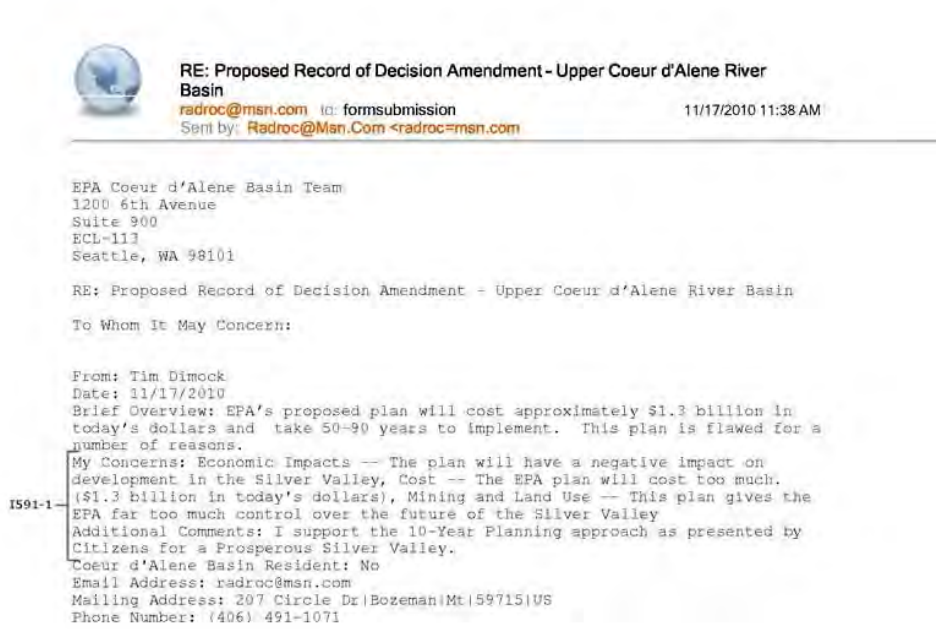
Response to comment I207-7

See response to Comment No. I54-2.

Response to comment I207-8

Comment noted.

Dimock, Tim, I591, Letter 617772



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
radroc@msn.com to: formsubmission 11/17/2010 11:38 AM
Sent by: Radroc@Msn.Com <radroc=msn.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

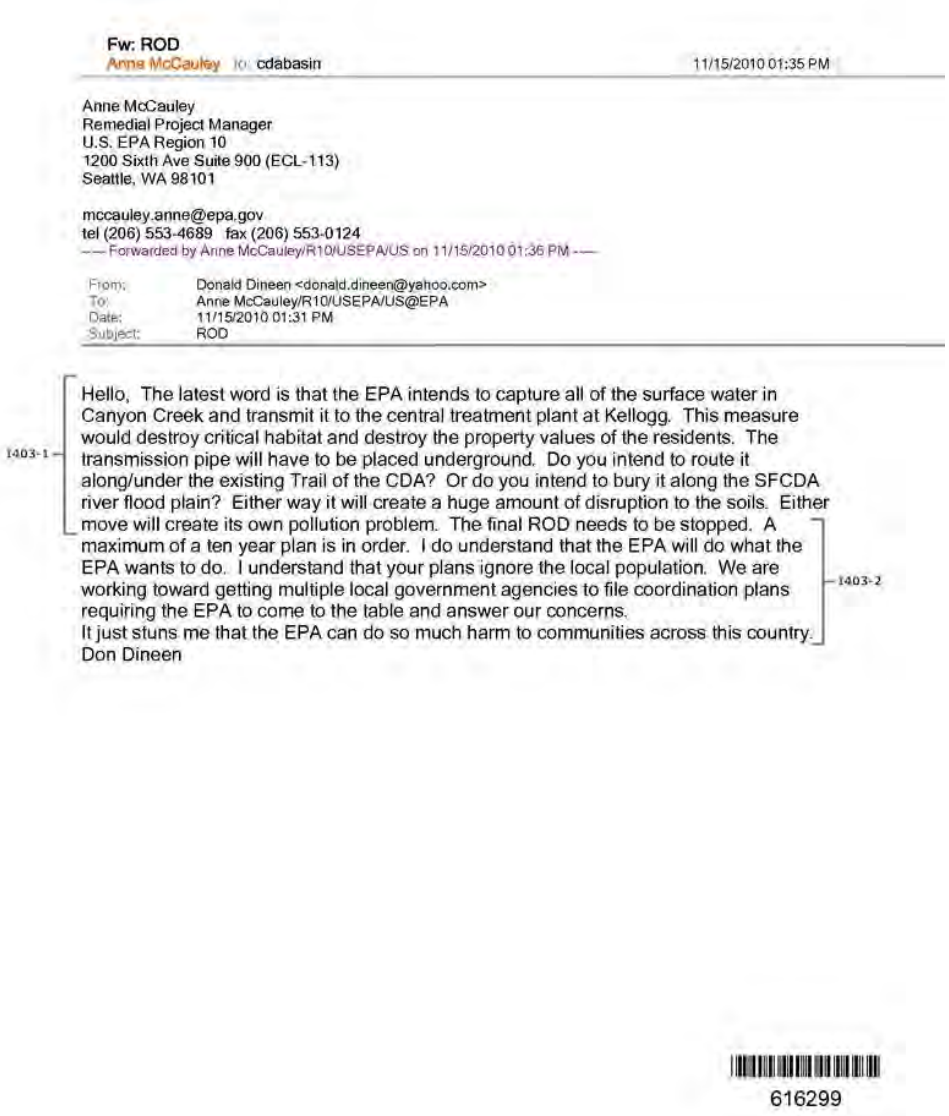
From: Tim Dimock
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I591-1 — My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: radroc@msn.com
Mailing Address: 207 Circle Dr|Bozeman|Mt|59715|US
Phone Number: (406) 491-1071

617772

Response to comment I591-1

See response to Comment No. I351-1.

Dineen, Donald, I403, Letter 616299



Fw: ROD
Anne McCauley to: cdabasin 11/15/2010 01:35 PM

Anne McCauley
Remedial Project Manager
U.S. EPA Region 10
1200 Sixth Ave Suite 900 (ECL-113)
Seattle, WA 98101

mccauley.anne@epa.gov
tel (206) 553-4689 fax (206) 553-0124
---- Forwarded by Anne McCauley/R10/USEPA/US on 11/15/2010 01:36 PM ----

From: Donald Dineen <donald.dineen@yahoo.com>
To: Anne McCauley/R10/USEPA/US@EPA
Date: 11/15/2010 01:31 PM
Subject: ROD

I403-1 Hello, The latest word is that the EPA intends to capture all of the surface water in Canyon Creek and transmit it to the central treatment plant at Kellogg. This measure would destroy critical habitat and destroy the property values of the residents. The transmission pipe will have to be placed underground. Do you intend to route it along/under the existing Trail of the CDA? Or do you intend to bury it along the SFCDA river flood plain? Either way it will create a huge amount of disruption to the soils. Either move will create its own pollution problem. The final ROD needs to be stopped. A maximum of a ten year plan is in order. I do understand that the EPA will do what the EPA wants to do. I understand that your plans ignore the local population. We are working toward getting multiple local government agencies to file coordination plans requiring the EPA to come to the table and answer our concerns. I403-2
It just stuns me that the EPA can do so much harm to communities across this country.
Don Dineen

616299

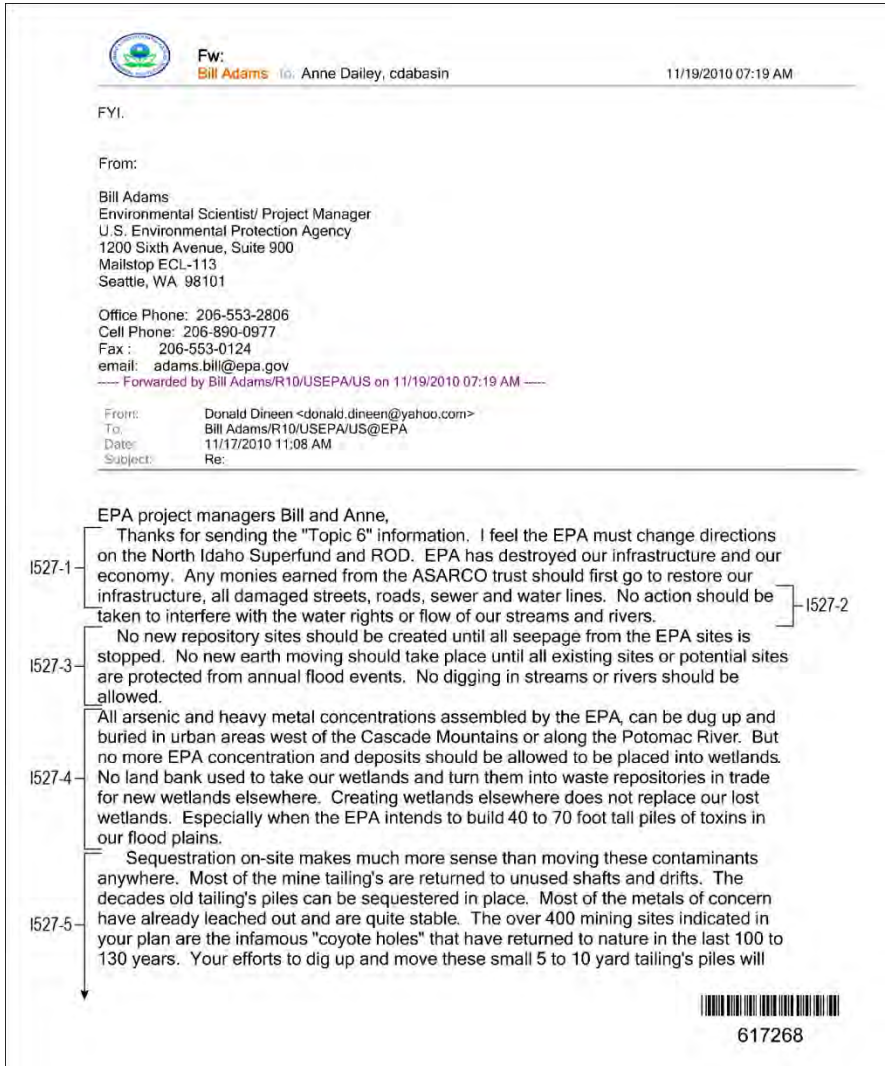
Response to comment I403-1

Capturing surface water in Canyon Creek was not a component of the Preferred Alternative and is not a component of the Selected Remedy. Collection and treatment of surface water from Canyon Creek was a component of the 2002 ROD for OU 3; however, that action has been replaced in this ROD Amendment with a more focused collection of groundwater only in the Woodland Park area. Collected groundwater will be conveyed to the CTP for treatment. Regarding routing of the conveyance pipeline, see response to Comment No. I248-1. Before the cleanup takes place, many pre-design activities will take place at specific sites, including for the route of the pipeline. The pre-design activities for the groundwater treatment pipe will, at a minimum, include surveying and mapping of the site; assessment of stormwater, surface water, and groundwater flows; assessment of site ownership; and identification of easement and access requirements. Collection of contaminated groundwater for treatment will result in some relatively minor, localized, flow reductions in Canyon Creek and the SFCDR. Regarding stream flow reduction, see response to Comment No. I54-8.

Response to comment I403-2

See responses to Comment Nos. I474-2, I295-2 and 1351-3.

Dineen, Donald, I527, Letter 617268



Fw:
Bill Adams to: Anne Dailey, cdabasin 11/19/2010 07:19 AM

FYI.

From:

Bill Adams
Environmental Scientist/ Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Mailstop ECL-113
Seattle, WA 98101

Office Phone: 206-553-2806
Cell Phone: 206-890-0977
Fax : 206-553-0124
email: adams.bill@epa.gov
---- Forwarded by Bill Adams/R10/USEPA/US on 11/19/2010 07:19 AM ----

From: Donald Dineen <donald.dineen@yahoo.com>
To: Bill Adams/R10/USEPA/US@EPA
Date: 11/17/2010 11:08 AM
Subject: Re:

EPA project managers Bill and Anne,

I527-1 Thanks for sending the "Topic 6" information. I feel the EPA must change directions on the North Idaho Superfund and ROD. EPA has destroyed our infrastructure and our economy. Any monies earned from the ASARCO trust should first go to restore our infrastructure, all damaged streets, roads, sewer and water lines. No action should be taken to interfere with the water rights or flow of our streams and rivers. I527-2

I527-3 No new repository sites should be created until all seepage from the EPA sites is stopped. No new earth moving should take place until all existing sites or potential sites are protected from annual flood events. No digging in streams or rivers should be allowed.

I527-4 All arsenic and heavy metal concentrations assembled by the EPA, can be dug up and buried in urban areas west of the Cascade Mountains or along the Potomac River. But no more EPA concentration and deposits should be allowed to be placed into wetlands. No land bank used to take our wetlands and turn them into waste repositories in trade for new wetlands elsewhere. Creating wetlands elsewhere does not replace our lost wetlands. Especially when the EPA intends to build 40 to 70 foot tall piles of toxins in our flood plains.

I527-5 Sequestration on-site makes much more sense than moving these contaminants anywhere. Most of the mine tailing's are returned to unused shafts and drifts. The decades old tailing's piles can be sequestered in place. Most of the metals of concern have already leached out and are quite stable. The over 400 mining sites indicated in your plan are the infamous "coyote holes" that have returned to nature in the last 100 to 130 years. Your efforts to dig up and move these small 5 to 10 yard tailing's piles will

617268

Response to comment I527-1

EPA agrees that the total cost of the Selected Remedy is a considerable amount of money and has significantly reduced the scope of the Selected Remedy from that of the Preferred Alternative identified in the Proposed Plan so that the total cost is decreased from $1.3 billion to about $635 million. Implementation of the Selected Remedy is expected to take about 30 years. EPA will pay for much of the proposed cleanup with funds from legal settlements between mining companies and the federal government. At this time, the largest amount of available settlement funds—more than $573 million—is from the ASARCO bankruptcy proceedings completed in 2009. Of this total, $494 million is apportioned for EPA response activities and the remainder will be used for mitigation of natural resource damage. Approximately $8 million are to be used for work in OU 2, the non-populated areas in the 21-square mile Bunker Hill Box surrounding Kellogg. An independent Work Trust has been established to manage the ASARCO settlement funds and conduct the EPA-approved cleanup. The money held by the Work Trust is invested, allowing this fund to continue to grow. Spending and investing under this Work Trust will be carefully managed by EPA to ensure the continued growth of the Trust while balancing the need to conduct cleanup in an efficient and a timely manner.

In 2011, a significant settlement was also reached with Hecla Mining Company. Under this settlement, Hecla will pay $263.4 million plus interest to the United States, the Coeur d'Alene Tribe, and the State of Idaho to resolve claims stemming from releases of wastes from its mining operations. Most (75 percent) of the recovery funds will be used for response actions at the Bunker Hill Superfund Site. The remaining amount will fund natural resource restoration projects.

Pursuant to the terms of the consent decrees approving these settlements, EPA may only use the recovered funds to perform response actions it selects. Asarco funds are specifically limited to response actions in OU 3. Hecla settlement funds can be used for select response actions throughout the Bunker Hill Superfund Site.

Regarding the "infrastructure and our economy" see responses to Comments Nos. I58-5 and I474-1.

Response to comment I527-2

See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I527-3

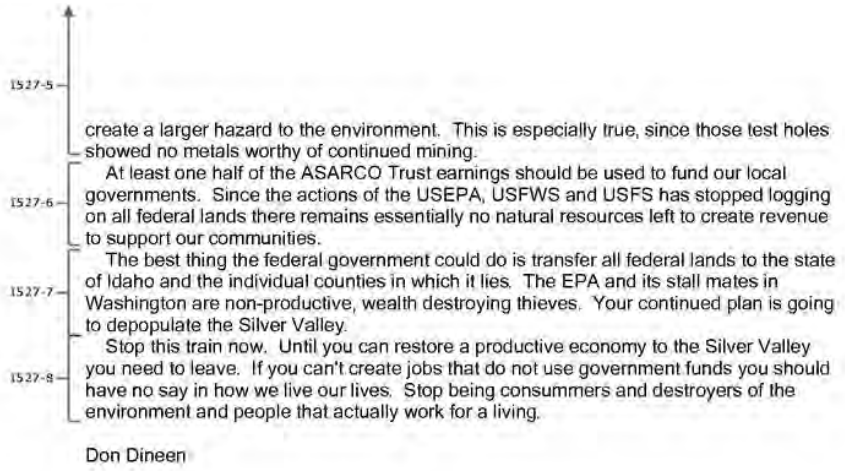
See response to Comment No. I54-3 regarding repositories. See responses to Comment Nos. I54-5 and LJ36-6 regarding remedy protection and flooding. With regard to cleanup work near or in streams or the SFCDR, after consideration of comments received on the Proposed Plan EPA further evaluated reaches of the SFCDR designated for stream and riparian cleanup actions that were of the most concern to stakeholders. As a result of this evaluation EPA has made changes to its plans for stream and riparian actions. These changes are described in the ROD Amendment, Part 2, Section 14.3.

Response to comment I527-4

The commenter may be referring to the 2009 1.6 acre Page Repository expansion into adjacent contaminated wetlands. This expansion did involve the use of a wetlands mitigation bank to make up for the loss of local Page area wetlands due to expansion. The Page Repository will be expanded again in the future and this expansion will impact additional areas of contaminated wetlands. IDEQ and EPA are currently working on a wetland design and conducting field work to allow for construction access to new wetlands across the Trail of the Coeur d'Alenes from Page wetlands that will be impacted by future expansion. Future wetlands mitigation will be located in the valley. Also see responses to Comment Nos. I54-3 and LC21-9.

Response to comment I527-5

See response to Comment No. I54-3.



I527-5 create a larger hazard to the environment. This is especially true, since those test holes showed no metals worthy of continued mining.

I527-6 At least one half of the ASARCO Trust earnings should be used to fund our local governments. Since the actions of the USEPA, USFWS and USFS has stopped logging on all federal lands there remains essentially no natural resources left to create revenue to support our communities.

I527-7 The best thing the federal government could do is transfer all federal lands to the state of Idaho and the individual counties in which it lies. The EPA and its stall mates in Washington are non-productive, wealth destroying thieves. Your continued plan is going to depopulate the Silver Valley.

I527-8 Stop this train now. Until you can restore a productive economy to the Silver Valley you need to leave. If you can't create jobs that do not use government funds you should have no say in how we live our lives. Stop being consummers and destroyers of the environment and people that actually work for a living.

Don Dineen

Response to comment I527-6

Regarding funding of the cleanup, see response to comment No. I295-3.

Regarding the effects of the cleanup on the economy, see response to Comment No. I474-1.

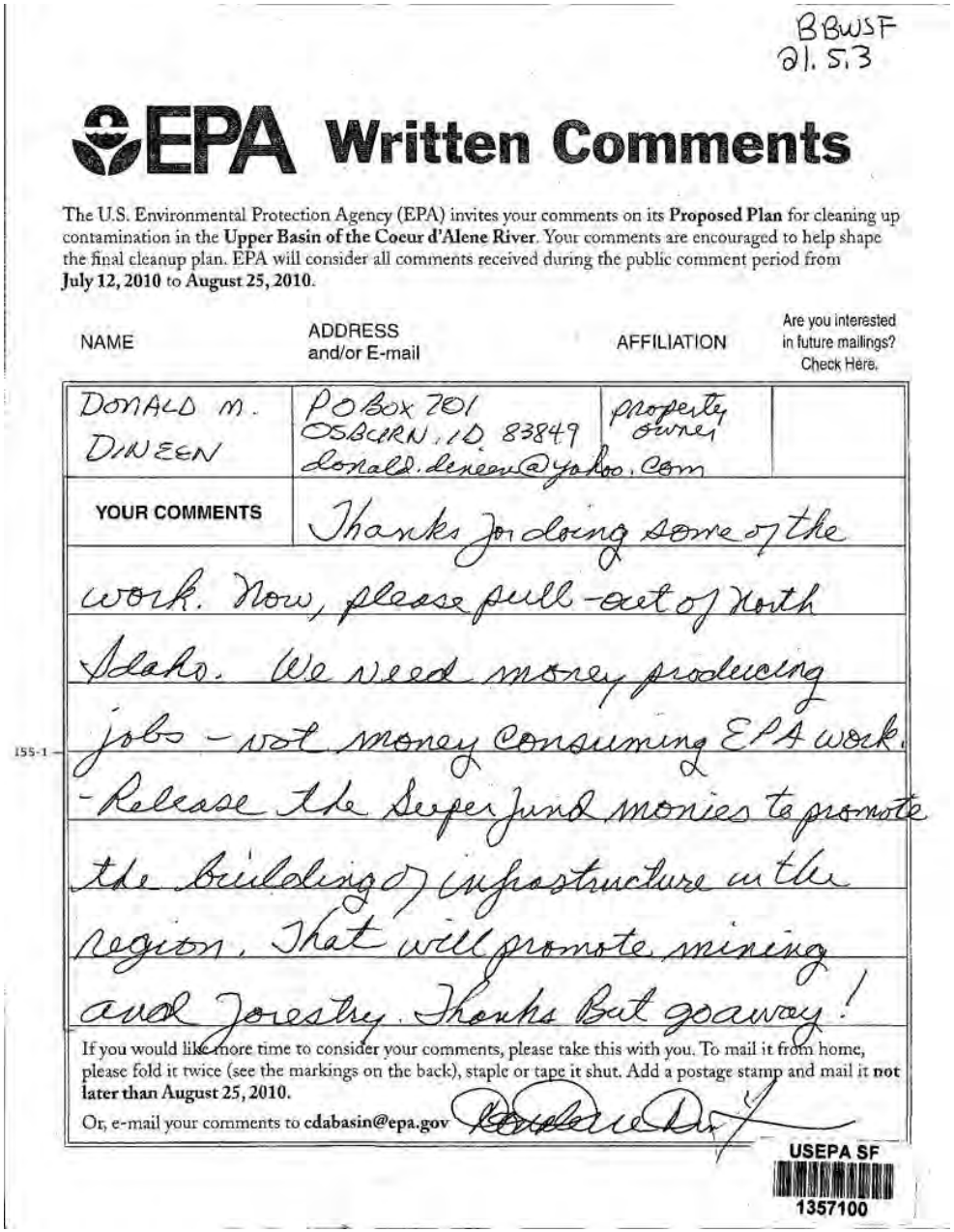
Response to comment I527-7

Comment noted.

Response to comment I527-8

Comment noted.

Dineen, Donald, I55, Letter 1357100



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
DONALD M. DINEEN	PO Box 701 OSBURN, ID 83849 donald.dineen@yahoo.com	property owner	

YOUR COMMENTS

Thanks for doing some of the work. Now, please pull out of North Idaho. We need money producing jobs – not money consuming EPA work. – Release the Superfund monies to promote the building of infrastructure in the region. That will promote mining and forestry. Thanks But go away!

I55-1

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357100

Response to comment I55-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Although significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses risks to people, wildlife, fish, and the environment.

Dineen, Donald, I372, Letter 616260

Page 1 of 1

Silver Valley ROD. North Idaho Superfund
Donald Dineen
to:
CDABasin
11/08/2010 09:49 PM
Show Details

Thank you for taking my comments on the proposed ROD for the new 1500 square mile Superfund cleanup. I am personally opposed to the project. I see how you intend to fund it using the earnings from the ASARCO settlement. Earnings of $40-50 million per year to create a perpetual clean up and land modeling operation that will last for several hundred years. I372-1

The problem is the EPA wants to create a low-wage non-productive project as opposed to working to build our community. EPA has destroyed the economy of North Idaho. No industry in the I-90 corridor seems to be the goal of Washington EPA environmentalists. I372-2

The wording contained in the ROD allowing mining are clearly so vague as to be meaningless. I372-3

Our community is suffering from damaged infrastructure caused by the cleanup crews. As I read the ROD it appears that EPA will not spend any of the ASARCO trust earnings to correct the damage done in the name of the federal government. It seems that you are passing the repairs onto the local jurisdictions that have nearly no tax base left to support the needed work. This is wrong. I372-4

The EPA has created a great environmental health hazard at each of its dump sites and at the treatment facility. The latest map shows that the entire canyon creek water system will be diverted to the leaking treatment plant in Kellogg. Instead of letting nature reclaim the land and streams you intend to destroy the earth in order to save it. In the process you are not only destroying the water system, but you are destroying the lives of our county. I372-5

I simply cannot understand the mentality of the EPA. Destroy lives by the thousands to implement unproven science class projects. Like a bunch of high school students given a pile of money to spend, with no adult supervision. I372-6

Don Dineen

11-08-2010

616260

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web5054.... 11/15/2010

Response to comment I372-1

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I372-2

See responses to Comment Nos. I54-2 and LC32-2.

Response to comment I372-3

See response to Comment No. I58-5.

Response to comment I372-4

The Selected Remedy includes estimated costs for constructing roads to access sites and to repair damage to existing roads due to cleanup activities. In addition, EPA and IDEQ recognize that some pre-existing paved roadways may not provide adequate long-term barriers to underlying contaminated material, and that local and state entities are responsible for the long-term road development and maintenance efforts. As a result, the agencies are developing an approach under the existing RODs to address this issue collaboratively with local, county, and state entities responsible for providing and maintaining roadways in their communities. The objective of this effort is to develop and implement a strategy that ensures the long-term effectiveness of roads that also serve as barriers, and aligns with the transportation and maintenance needs of the Box and Basin communities.

Response to comment I372-5

See responses to Comment Nos. I54-8 and I54-9.

Response to comment I372-6

Comment noted.

Dineen, Donald, I592, Letter 617773

Fw: EPA
Donald Dineen
to:
CDABasin
11/17/2010 10:30 PM
Show Details

This is a copy of a letter to the editor that I thought you could add to the public comments on the ROD. Don Dineen

----- Forwarded Message ----
From: Donald Dineen <donald.dineen@yahoo.com>
To: Dan Drewy Shoshone News Press <ddrewry@shoshonenewspress.com>
Sent: Wed, November 17, 2010 9:19:06 AM
Subject: EPA

Editor,

Thank you for taking a strong position regarding the EPA Record Of Decision. The EPA cleanup past years has done some good for our valley. No one I know thinks the cleanup was a bad thing, except for the collateral damage they brought. When EPA came on scene our
I592-1 valley was a mess. We did need to clean things up and we did. Our population went from a high of 23,000 people just before EPA showed up, down to 13,000 people today. That dragged the valley down to 1910 levels. Along with the missing 10,000 people and their productive jobs went the future of our Silver Valley.

The Pickard's in their letter to the editor obviously just don't get it. They feel that, evil big mining, is totally responsible for our early mess. Well, a bunch of that was true but the reason the
I592-2 mines are here is the naturally existing metals in the ground. We live in Mother Natures heavy metal storehouse. No one will ever remove the metals from our mountains and streams, without the earth undoing the EPA efforts.

Pickard's feel that we have enough big employers in the Valley. They cite the school districts and our health care industry. They forgot that government is a huge employer. What Pickard's fail to recognize is that schools, medical services and local governments are all consumptive enterprises. In order for those enterprises to exist
I592-3 they have to consume money created in the private back pockets of the people. If you want good schools - pay big taxes. If you want good health care - pay big insurance fees. If you want good local government - pay taxes. We all get the services provided by those groups. But those groups, our largest employers in the valley, do not create wealth.

Only private business creates wealth. Basic economics, if you want services someone has to pay the bills. If every industry in the
I592-4 Silver Valley is a non-producer of wealth, who then creates the money to pay those folks? We are lucky to have one large commercial Enterprise that employs a bunch of people, Dave Smith Motors. It strikes me that we are just beneficiaries of good luck by having DSM.

We do have some other big businesses. Mining companies that are now very regulated. Our mines actually create wealth that allows much of what we have to continue on. Without the mines our Silver Valley would be a tourist spot on some map and people would stop to
I592-5 get gasoline and gas station chicken. Really folks, to the outside world, the Silver Valley is known as a polluted former whore house

617773

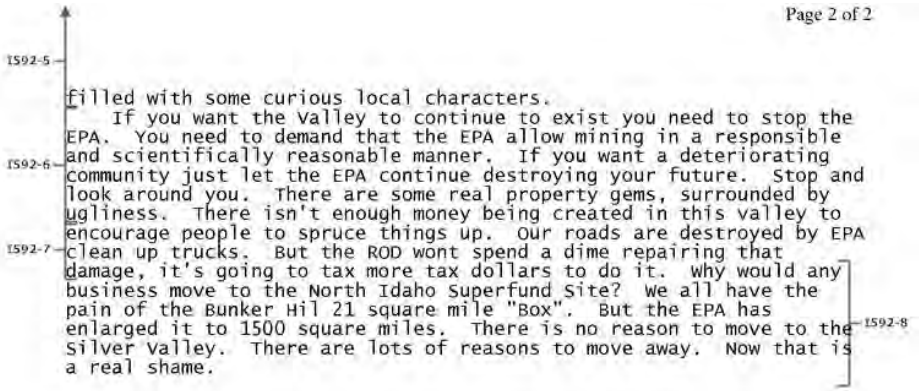
Response to comment I592-1
Thank you for your comment.

Response to comment I592-2
See response to Comment No. LC33-8.

Response to comment I592-3
Thank you for your comment.

Response to comment I592-4
Comment noted.

Response to comment I592-5
Comment noted.



Page 2 of 2

I592-5

filled with some curious local characters.

If you want the Valley to continue to exist you need to stop the EPA. You need to demand that the EPA allow mining in a responsible and scientifically reasonable manner. If you want a deteriorating community just let the EPA continue destroying your future. Stop and look around you. There are some real property gems, surrounded by ugliness. There isn't enough money being created in this valley to encourage people to spruce things up. Our roads are destroyed by EPA clean up trucks. But the ROD wont spend a dime repairing that damage, it's going to tax more tax dollars to do it. Why would any business move to the North Idaho Superfund Site? We all have the pain of the Bunker Hil 21 square mile "Box". But the EPA has enlarged it to 1500 square miles. There is no reason to move to the Silver Valley. There are lots of reasons to move away. Now that is a real shame.

I592-6

I592-7

I592-8

Response to comment I592-6

See response to Comment No. I58-5.

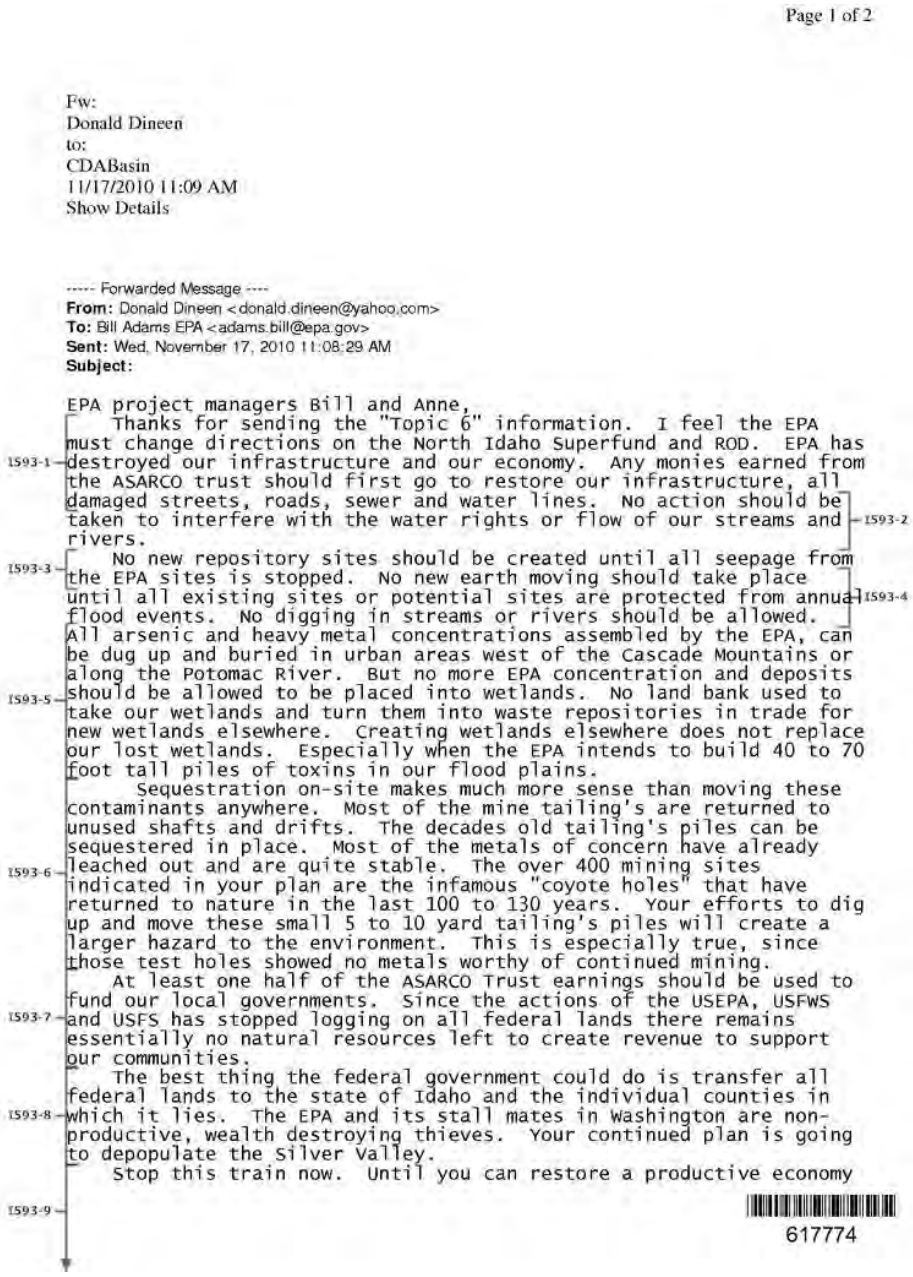
Response to comment I592-7

The Selected Remedy includes estimated costs for constructing roads to access sites and to repair damage to existing roads due to cleanup activities. The RODs for OUs 1, 2, and 3 address cleanup of rights-of-way (ROWs) in the Bunker Hill Box and the Coeur d'Alene Basin, as appropriate, to respond to risks to human health. The RODs allow ROWs to be cleaned up such that they provide barriers to underlying metals contamination. Many ROWs have been cleaned up as residential and commercial properties have been remediated in Box and Basin communities. However, EPA and IDEQ recognize that some pre-existing paved roadways may not provide adequate long-term barriers to underlying contaminated material, and that local and state entities are responsible for the long-term road development and maintenance efforts. As a result, the agencies are developing an approach under the existing RODs to address this issue collaboratively with local, county, and state entities responsible for providing and maintaining roadways in their communities. The objective of this effort is to develop and implement a strategy that ensures the long-term effectiveness of barriers installed in ROWs, and also aligns with the transportation and maintenance needs of the Box and Basin communities.

Response to comment I592-8

See response to Comment No. I474-1.

Dineen, Donald, I593, Letter 617774



Page 1 of 2

Fw:
Donald Dineen
to:
CDABasin
11/17/2010 11:09 AM
Show Details

----- Forwarded Message ----
From: Donald Dineen <donald.dineen@yahoo.com>
To: Bill Adams EPA <adams.bill@epa.gov>
Sent: Wed, November 17, 2010 11:08:29 AM
Subject:

EPA project managers Bill and Anne,
Thanks for sending the "Topic 6" information. I feel the EPA
I593-1 must change directions on the North Idaho Superfund and ROD. EPA has destroyed our infrastructure and our economy. Any monies earned from the ASARCO trust should first go to restore our infrastructure, all damaged streets, roads, sewer and water lines. No action should be taken to interfere with the water rights or flow of our streams and I593-2 rivers.
I593-3 No new repository sites should be created until all seepage from the EPA sites is stopped. No new earth moving should take place until all existing sites or potential sites are protected from annual I593-4 flood events. No digging in streams or rivers should be allowed.
All arsenic and heavy metal concentrations assembled by the EPA, can be dug up and buried in urban areas west of the Cascade Mountains or along the Potomac River. But no more EPA concentration and deposits
I593-5 should be allowed to be placed into wetlands. No land bank used to take our wetlands and turn them into waste repositories in trade for new wetlands elsewhere. Creating wetlands elsewhere does not replace our lost wetlands. Especially when the EPA intends to build 40 to 70 foot tall piles of toxins in our flood plains.
Sequestration on-site makes much more sense than moving these contaminants anywhere. Most of the mine tailing's are returned to unused shafts and drifts. The decades old tailing's piles can be sequestered in place. Most of the metals of concern have already
I593-6 leached out and are quite stable. The over 400 mining sites indicated in your plan are the infamous "coyote holes" that have returned to nature in the last 100 to 130 years. Your efforts to dig up and move these small 5 to 10 yard tailing's piles will create a larger hazard to the environment. This is especially true, since those test holes showed no metals worthy of continued mining.
At least one half of the ASARCO Trust earnings should be used to fund our local governments. Since the actions of the USEPA, USFWS
I593-7 and USFS has stopped logging on all federal lands there remains essentially no natural resources left to create revenue to support our communities.
The best thing the federal government could do is transfer all federal lands to the state of Idaho and the individual counties in
I593-8 which it lies. The EPA and its stall mates in Washington are non-productive, wealth destroying thieves. Your continued plan is going to depopulate the Silver Valley.
Stop this train now. Until you can restore a productive economy
I593-9

617774

Response to comment I593-1
Regarding funding of the cleanup, see response to Comment No. I58-2. Regarding the "infrastructure and our economy" see responses to Comments Nos. I58-5 and I474-1.

Response to comment I593-2
See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I593-3
See response to Comment No. I54-3.

Response to comment I593-4
See responses to Comment Nos. I54-5 and LJ36-3.

Response to comment I593-5
Comment noted.

Response to comment I593-6
See response to Comment No. I822-14.

Response to comment I593-7
Regarding funding of the cleanup, see response to comment No. I295-3. Regarding the effects of the cleanup on the economy, see response to Comment No. I474-1.

Response to comment I593-8
Comment noted.

Response to comment I593-9
EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. See response to Comment Nos. LC32-2 and I295-3.

IS93-9 to the Silver Valley you need to leave. If you can't create jobs that do not use government funds you should have no say in how we live our lives. Stop being consummers and destroyers of the environment and people that actually work for a living.

Don Dineen

No comments

Dineen, Donald, I9, Letter 896732

Fw: ger wanted in the Silver Valley.Upper CDA basin clean up
Donald Dineen
to:
CDABasin
08/09/2010 10:22 AM
Show Details

----- Forwarded Message ----
From: Donald Dineen <donald.dineen@yahoo.com>
To: adams.bill@epa.gov
Sent: Sun, August 8, 2010 10:32:53 PM
Subject: ger wanted in the Silver Valley.Upper CDA basin clean up

Dear Mr. Adams,

I9-1 The presentation in Smelterville on August 4th was very interesting. It was obvious from the 50 or so speakers that the EPA is no longer wanted in the Silver Valley. I have only lived here for 3 1/2 years, to be near my grandchildren. In that time I have watched the communities economic base shrink more.

I9-2 The Silver Valley is negatively impacted by the presence of the EPA actions and attached stigma carried with the the Super Fund designation. Most of the "yard work" I have seen shows removal of "contaminated soils", only to be replaced by inferior soils having a high concentration of noxious weeds. The Valley is a mess. The cost of the yard crews in relation to the end product seems to be out of reason. The jobs cost too much for giving such inferior results. I feel the EPA should reduce their presence in the state of Idaho. Forty million dollars a year for people to move some dirty earth to unsafe areas.

I9-3 Pumping treated water for miles and miles only to dump the effluent into a leaking pond above Kellogg. Insanity, disruptive, un-needed.

I9-4 Thank you for showing up and doing the work, even though it is poor quality work, leaving ugly yards and many new weeds behind. The money generated by the growth of the Asarco Trust should be spent improving the community infrastructure and doing simple sequestration of contaminated soils. We need a community that has appeal to new industries involving mining and forestry. The presence of EPA in the Valley drives people away, drives business away, drives tourists away.

We know that the people at EPA are sincere in their belief that they are doing good things. But from my perspective the EPA is an untrustworthy, thuggish group of over sensitive people bent on saving the earth at the expense of its human residents. A response learned from members of the early US Forest Service. Smart Harvard and Yale graduates that knew so much more than the settlers. "We are from the government and we will save you from your ignorant selves". Arrogant bullies with Federal authority, money and rule books. Like a group of "revenuers" chasing moonshiners. Legal but unwanted.

I9-5 Please rethink the ROD. I think you will find that most Silver Valley residents will view this continuing intrusion into our lives as a bad thing. More big government, pushed down or throats or up our tushes by a person wearing an Obama campaign button. Taking more rights from us as individuals and as small local communities.

Over 40 years ago my father was bullied into installing a high efficiency cedar waste burner. It cost him a fortune. The two EPA officials I was standing behind, they didn't know who I was, were laughing about how they never really thought they could get anyone to do the job. The EPA gave him an award. Along with that, increased fuel costs to burn the waste, and a Jimmy Carter economy he lost most of his income and died shortly after the EPA came to town. For 35 years now the burner has sat unused - it helped ruin the economy and the cedar business. You do that in every community you charge into. "Help from the federal government" has destroyed more industry and jobs as the EPA saves mother earth.

Please go away,

Don Dineen

896732

Response to comment I9-1
Thank you for your comment.

Response to comment I9-2
See responses to Comment Nos. I54-2 and I521-8.

Response to comment I9-3
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. As described in the FFS, Proposed Plan and ROD Amendment, numerous studies over the years have documented these risks. The Selected Remedy is expected to make significant progress towards addressing these risks. Water treatment is a key part of the Selected Remedy because it will (1) address subsurface materials too deep or impractical to be removed, (2) generally provide a high degree of metals load reduction for a relatively low cost, and (3) achieve immediate improvements to water quality. EPA has conducted studies to evaluate groundwater-surface water interactions and characterize aquifer properties in key areas of the Upper Basin, conducted pilot studies for groundwater treatment, and evaluated the cost of implementing various groundwater treatment technologies. These studies found that for some areas within the Upper Basin, collection of groundwater and treatment at the Central Treatment Plant (CTP) in Kellogg is the lowest-cost treatment option.

Response to comment I9-4
See responses to Comment Nos. I521-8 and I54-2.

Response to comment I9-5
Comment noted.

Dineen, Donald, I10, Letter 896733

Silver Valley ROD
Donald Dineen
to:
CDABasin
08/10/2010 04:39 PM
Show Details

Hello,

Last night, August 9, 2010, I attended the public comment session at Kellogg High School. Once again we heard from about 50 people. All but one speaker spoke out against adoption of the proposed ROD amendment. If the EPA official didn't get the message I10-1 he would have to have been in an office in Seattle to miss it. Many of us living in the Silver Valley deeply resent the presence of the EPA and the attendant Superfund designation.

Several scientist testified, and reminded the EPA, Governor Otter and Senator Crappo that reports filed earlier declared the methods and techniques used by the EPA were fraudulent or just poor science. One scientist even testified that he observed EPA technicians falsify I10-2 water samples taken at the fish hatchery. He witnessed the "real sample" testing clean. So the EPA techs created contaminated water samples that would satisfy the goals set forth by the EPA administrators. One problem, the sulfates used by those techs did not match the naturally appearing sulfates in the Valley.

The EPA has become an over-powerful government agency that is stomping local communities into the ground. EPAs goal is to destroy the economic base of this country. The goal of cleaning up and protecting the environment has been lost in the rush toward total I10-3 control. Total control of industry through threats, fines, closure, increased costs to meet unrealistic ends and a transfer of wealth to foreign nations. The EPA has become the Enemy of the People of America. We live in fear of your heavy and destructive hand. Please leave Idaho alone.

Donald M. Dineen
PO Box 701
Osburn, Idaho 83849-0701
208-512-2943
donald.dineen@yahoo.com

896733

Response to comment I10-1

Thank you for your comment.

Response to comment I10-2

EPA is unaware of any instances where the sampling or analytical methodologies it employed in developing the technical information that supports this ROD Amendment were not scientifically acceptable. In addition EPA is not aware of any instances where fraudulent practices were used by on behalf of EPA. EPA conducts monitoring activities in accordance with all appropriate testing standards and quality control procedures.

Response to comment I10-3

Comment noted.

Dineen, Donald, I24, Letter 897236

Fw: [PCincubator] FW: Basin Commission meeting - McLerran rejects states' rights
Donald Dineen
to:
CDABasin
08/23/2010 03:36 PM
Show Details

I24-1 Hello, As you disrespect citizens who complain that the federal government is out of control, maybe you will recognize why we distrust the EPA. It is obvious that the thug-ocracy at EPA is going to crush the Silver Valley. There is going to be a sea change within the power structure in Washington. It will happen because of statements such as Mr. McClerran's.
Don Dineen

----- Forwarded Message ----
From: Donald Dineen <donald.dineen@yahoo.com>
To: Dwight Greer <dwight@molalla.net>
Sent: Mon, August 23, 2010 3:24:28 PM
Subject: Fw: [PCincubator] FW: Basin Commission meeting - McLerran rejects states' rights

This is the piece from the Basin commission meeting in greater depth than the newspaper article. EPA rules, we don't count. Don

----- Forwarded Message ----
From: Linda Yergler <lindayergler@usamedia.tv>
To: Growing the GOP in SC <pcincubator@shoshone-gop.org>
Sent: Mon, August 23, 2010 3:20:56 PM
Subject: [PCincubator] FW: Basin Commission meeting - McLerran rejects states' rights

Here we go gang...

-----Original Message-----
From: Serena Carlson [mailto:SCarlson@hecla-mining.com]
Sent: Monday, August 23, 2010 3:08 PM
To: jimhollingsworth@verizon.net; jann@eclecticsilver.net; lindayergler@usamedia.tv
Subject: Basin Commission meeting - McLerran rejects states ' rights

EPA administrator rejects state sovereignty in Basin cleanup plan
From a transcript of EPA Region 10 Administrator Dennis McLerran's remarks at the Basin Environmental Improvement Project Commission meeting in Wallace last week (emphasis added by editor): "Lastly, I want to say we heard that a lot folks have asked Governor Otter to stop the ROD Amendment. Well, a couple of things about that. One, EPA under our Statutes has an obligation to be here to do this cleanup. We're in the Valley, we're here to stay, and we're not going away until the job is done. And I heard the comments where people said, get in your Prius and go back to Seattle . Well, you know we've been in the Valley a long time. There's a job that still remains to be done and we're going to stay here in the Valley; and while we want to get concurrence from the State with respect to the remedy, we do have authority under our Statutes to move forward without that concurrence. I'm not saying we don't want to get that concurrence; we do want to get that concurrence . . . I just want people to know that people are calling on the Governor to stop this. He just doesn't have that authority to stop this. We are in a position where we will move forward with the plan. We want to get the State on board. We want the Governor and Idaho DEQ on board and we'll work hard to get that. But, that comment is just not a reality."-BEIPC transcript

897236

Response to comment I24-1
Comment noted.

Dineen, Donald, I444, Letter 898783

Page 1 of 1

Silver Valley ROD
Donald Dineen
to:
CDABasin
08/24/2010 12:19 PM
Show Details

Administrator McClarren,

I444-1 — Your remarks at the recent CDA Basin Commission meeting continue to cause a great stir in the Silver Valley. It was nice to see that you actually feel the EPA is allowed to function without being constrained by the constitution. Your expressed belief that administrative rules are superior to the constitutional restraints on government certainly are unusual. If the states have no recourse but to accept the EPA fist and club, then we have obviously given you too much power. It is my belief that you have given us little people enough ammunition to start rolling back your excesses.

Thank you for being so blunt and honest about your agencies disregard for the rule of constitutional law. Your remarks will aid us in the deconstruction of the EPA.

Earlier I had commented that I felt your people were sincere in their desire to improve the environment. But, it is obvious that you have a darker mindset aimed at destroying communities and the rule of law.

Don Dineen

898783

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web8014.h... 8/27/2010

Response to comment I444-1

See response to Comment No. LJ39-5.

Dingman, Kenneth, I594, Letter 617775

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
merryr11@peoplepc.com to: formsubmission 11/19/2010 03:12 PM
Sent by: Merryr11@Peoplepc.Com <merryr11=peoplepc.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

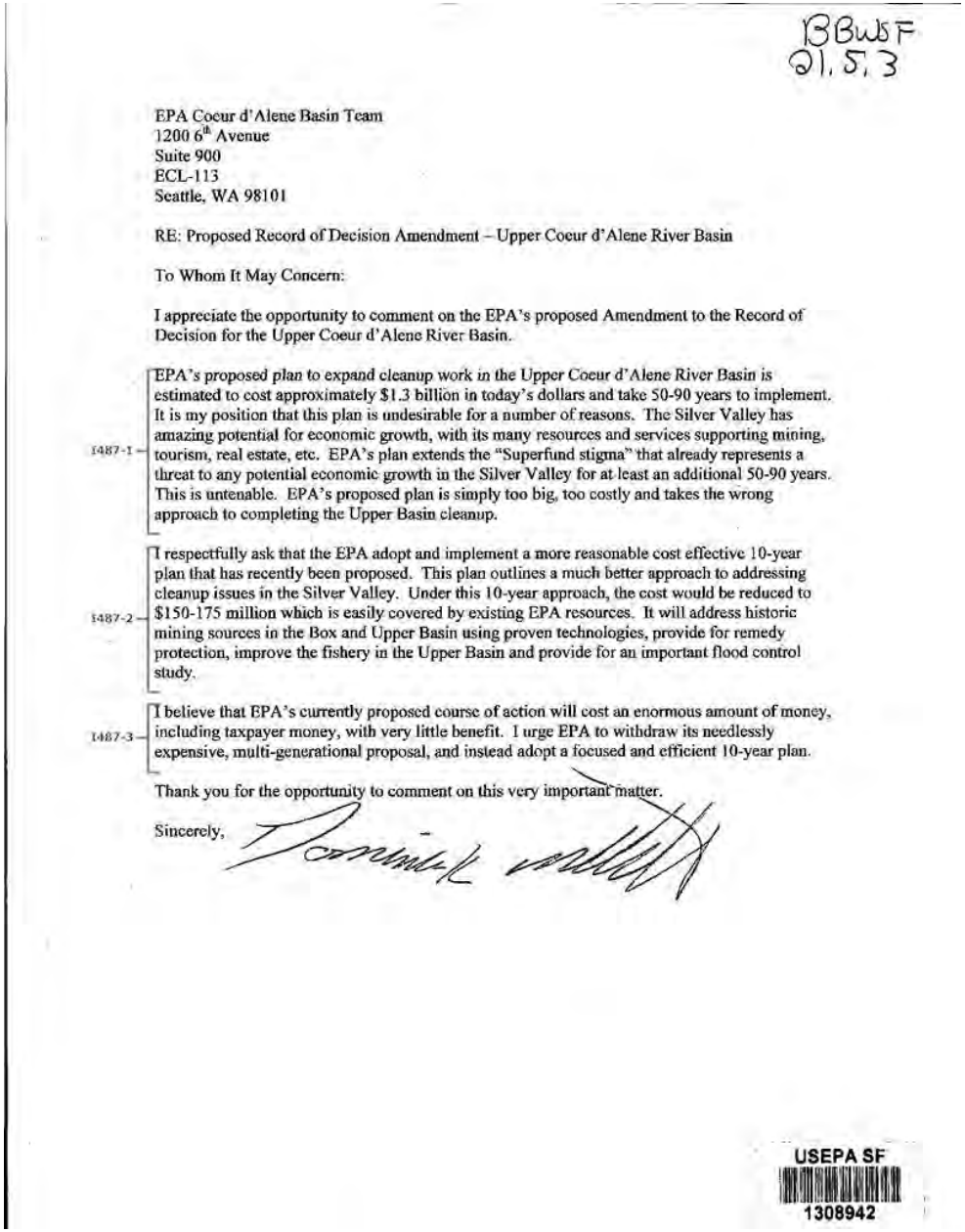
From: KENNETH DINGMAN
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. Having seen the Silver Valley when it was a brown valley, I find it hard to believe that digging up nature's healing process and starting over is a good idea. Aren't you just bringing it back to the surface to bury it somewhere else?
I594-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: merryr11@peoplepc.com
Mailing Address: 11922 E KEMPTON ROAD|COEUR D'ALENE|ID|83814|US
Phone Number:

617775

Response to comment I594-1

See response to Comment No. I351-1.

Dominick, I487, Letter 1308942



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I487-1 – EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I487-2 – I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I487-3 – I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Dominick

USEPA SF
1308942

Response to comment I487-1

See response to Comment No. I474-1.

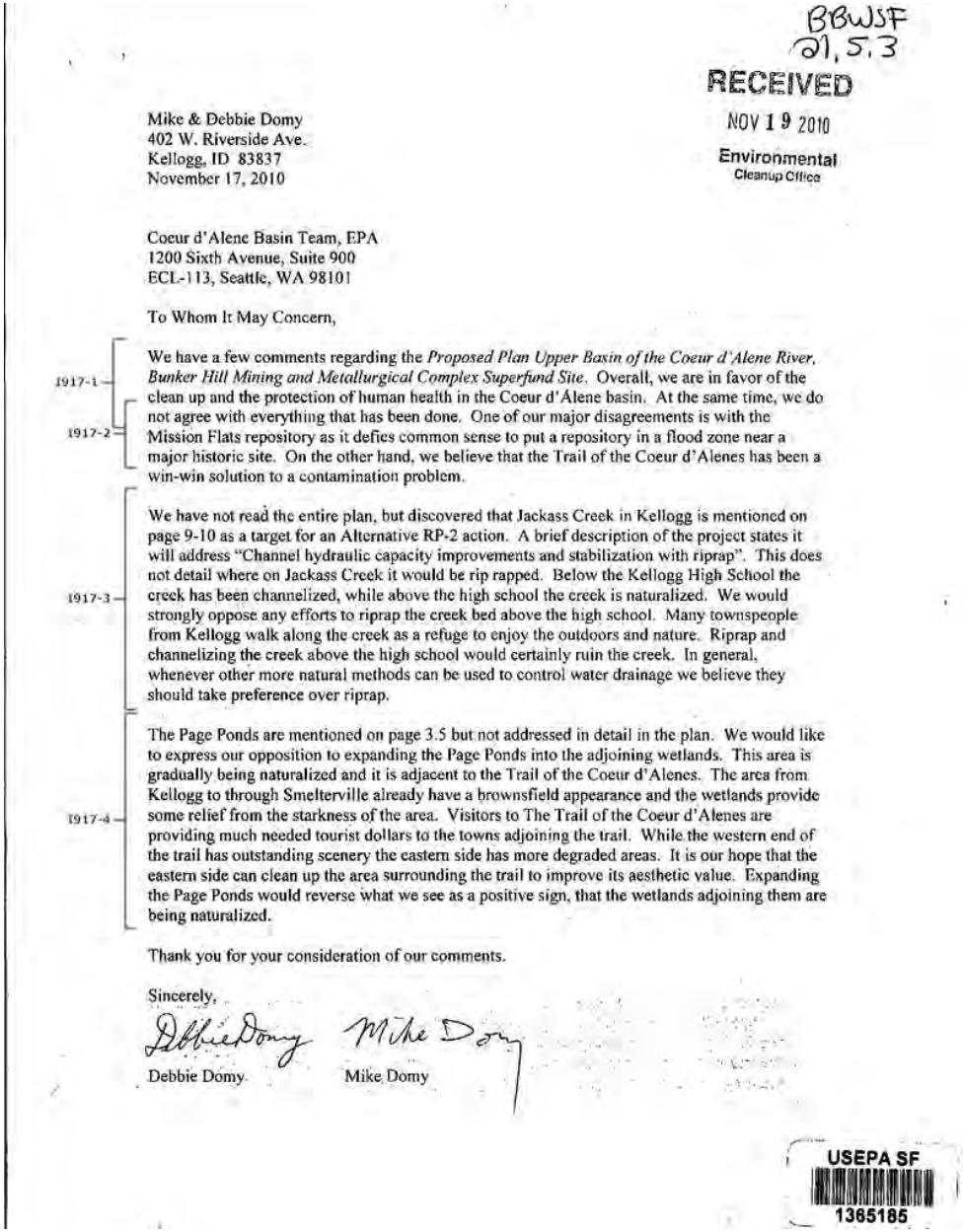
Response to comment I487-2

See response to Comment No. I474-2.

Response to comment I487-3

See response to Comment No. I474-3.

Domy, Debbie and Mike, I917, Letter 1365185



BBWSF
21,5.3

RECEIVED
NOV 19 2010
Environmental
Cleanup Office

Mike & Debbie Domy
402 W. Riverside Ave.
Kellogg, ID 83837
November 17, 2010

Coeur d'Alene Basin Team, EPA
1200 Sixth Avenue, Suite 900
ECL-113, Seattle, WA 98101

To Whom It May Concern,

I917-1 We have a few comments regarding the *Proposed Plan Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*. Overall, we are in favor of the clean up and the protection of human health in the Coeur d'Alene basin. At the same time, we do

I917-2 not agree with everything that has been done. One of our major disagreements is with the Mission Flats repository as it defies common sense to put a repository in a flood zone near a major historic site. On the other hand, we believe that the Trail of the Coeur d'Alenes has been a win-win solution to a contamination problem.

We have not read the entire plan, but discovered that Jackass Creek in Kellogg is mentioned on page 9-10 as a target for an Alternative RP-2 action. A brief description of the project states it will address "Channel hydraulic capacity improvements and stabilization with riprap". This does

I917-3 not detail where on Jackass Creek it would be rip rapped. Below the Kellogg High School the creek has been channelized, while above the high school the creek is naturalized. We would strongly oppose any efforts to riprap the creek bed above the high school. Many townspeople from Kellogg walk along the creek as a refuge to enjoy the outdoors and nature. Riprap and channelizing the creek above the high school would certainly ruin the creek. In general, whenever other more natural methods can be used to control water drainage we believe they should take preference over riprap.

The Page Ponds are mentioned on page 3.5 but not addressed in detail in the plan. We would like to express our opposition to expanding the Page Ponds into the adjoining wetlands. This area is gradually being naturalized and it is adjacent to the Trail of the Coeur d'Alenes. The area from

I917-4 Kellogg to through Smelterville already have a brownsfield appearance and the wetlands provide some relief from the starkness of the area. Visitors to The Trail of the Coeur d'Alenes are providing much needed tourist dollars to the towns adjoining the trail. While the western end of the trail has outstanding scenery the eastern side has more degraded areas. It is our hope that the eastern side can clean up the area surrounding the trail to improve its aesthetic value. Expanding the Page Ponds would reverse what we see as a positive sign, that the wetlands adjoining them are being naturalized.

Thank you for your consideration of our comments.

Sincerely,

Debbie Domy Mike Domy

Debbie Domy Mike Domy

USEPA SF
1365185

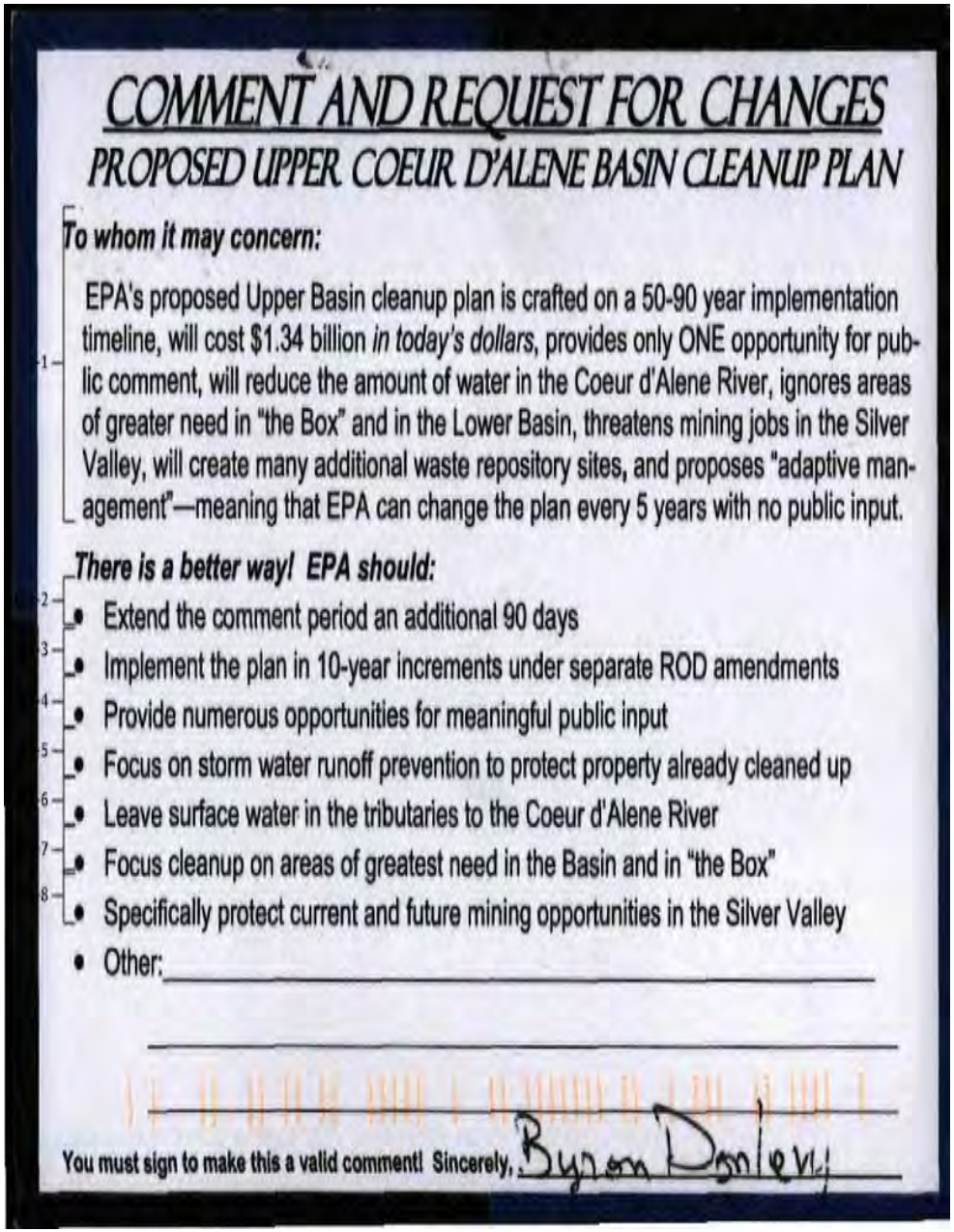
Response to comment I917-1
Thank you for your comments.

Response to comment I917-2
See response to Comment No. LC21-9.

Response to comment I917-3
The remedy protection actions for Jackass Creek are located downstream from the high school where the creek has been channelized. There are no actions upstream from the high school. The conceptual design, including figures, for Alternative RP-2 actions in Jackass Creek are presented in Appendix G of the FFS Report (CH2M HILL, July 2010, *Draft Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site, prepared for EPA Region 10*).

Response to comment I917-4
Thank you for your comment. Expansion of the existing Page Institutional Controls Program Repository is proceeding outside the scope of this ROD Amendment. IDEQ and EPA are working with interested individuals and organizations to address aesthetic and wildlife habitat concerns similar to those expressed by the commenter. Mitigation for wetlands impacted by the expansion is planned for an area adjacent to the Trail of Coeur d'Alenes near the impacted wetlands. In response to input from stakeholders, preliminary designs for this work have incorporated components to enhance the experience of Trail users in the Page area.

Donlevy, Byron, I31, Letter 1357075



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

2 • Extend the comment period an additional 90 days
3 • Implement the plan in 10-year increments under separate ROD amendments
4 • Provide numerous opportunities for meaningful public input
5 • Focus on storm water runoff prevention to protect property already cleaned up
6 • Leave surface water in the tributaries to the Coeur d'Alene River
7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other:_____

You must sign to make this a valid comment! Sincerely, Byron Donlevy

Response to comment I31-1
See response to Comment No. I25-1.

Response to comment I31-2
See response to Comment No. I25-2.

Response to comment I31-3
See response to Comment No. I25-3.

Response to comment I31-4
See response to Comment No. I25-4.

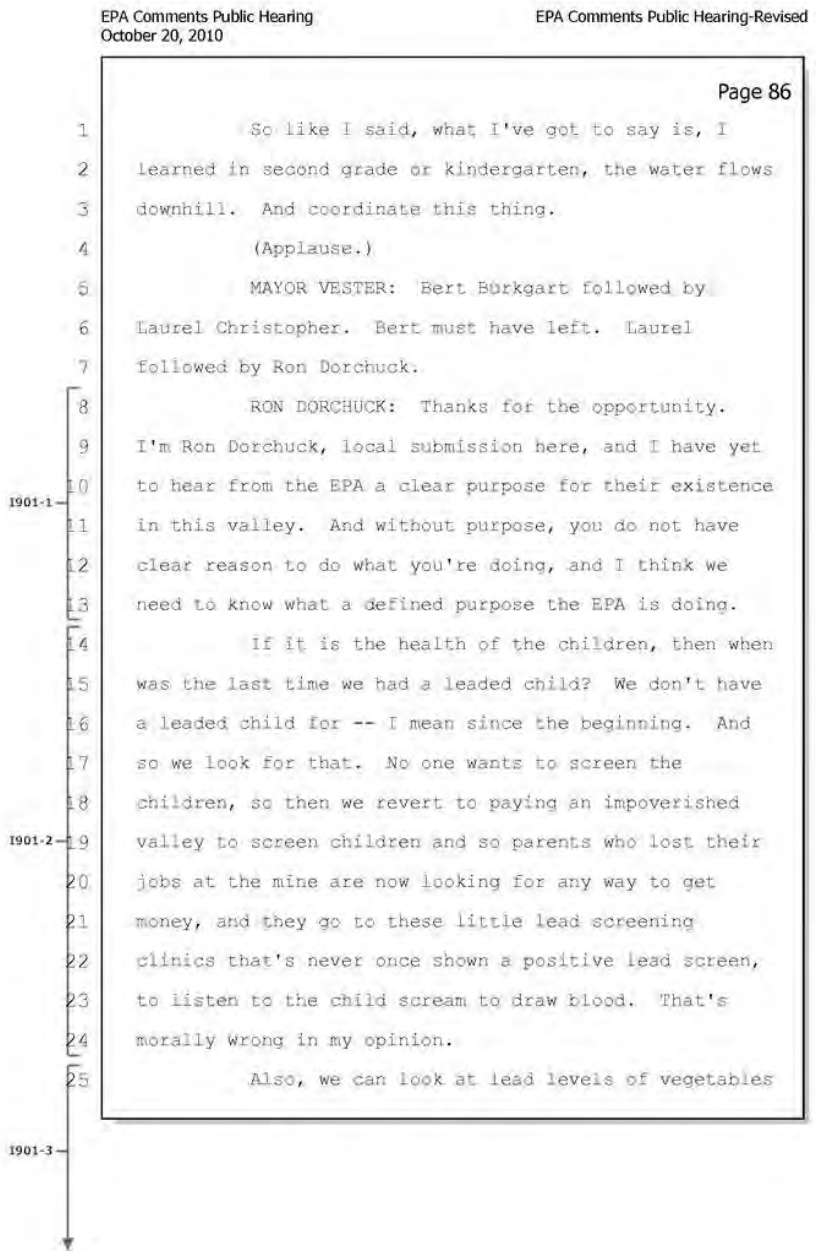
Response to comment I31-5
See response to Comment No. I25-5.

Response to comment I31-6
See response to Comment No. I25-6.

Response to comment I31-7
See response to Comment No. I25-7.

Response to comment I31-8
See response to Comment No. I25-8.

Dorchuck, Ron, I901, Letter 619651-36



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 86

So like I said, what I've got to say is, I learned in second grade or kindergarten, the water flows downhill. And coordinate this thing.

(Applause.)

MAYOR VESTER: Bert Burkgart followed by Laurel Christopher. Bert must have left. Laurel followed by Ron Dorchuck.

RON DORCHUCK: Thanks for the opportunity. I'm Ron Dorchuck, local submission here, and I have yet to hear from the EPA a clear purpose for their existence in this valley. And without purpose, you do not have clear reason to do what you're doing, and I think we need to know what a defined purpose the EPA is doing.

I901-1

If it is the health of the children, then when was the last time we had a leaded child? We don't have a leaded child for -- I mean since the beginning. And so we look for that. No one wants to screen the children, so then we revert to paying an impoverished valley to screen children and so parents who lost their jobs at the mine are now looking for any way to get money, and they go to these little lead screening clinics that's never once shown a positive lead screen, to listen to the child scream to draw blood. That's morally wrong in my opinion.

I901-2

Also, we can look at lead levels of vegetables

I901-3

Response to comment I901-1

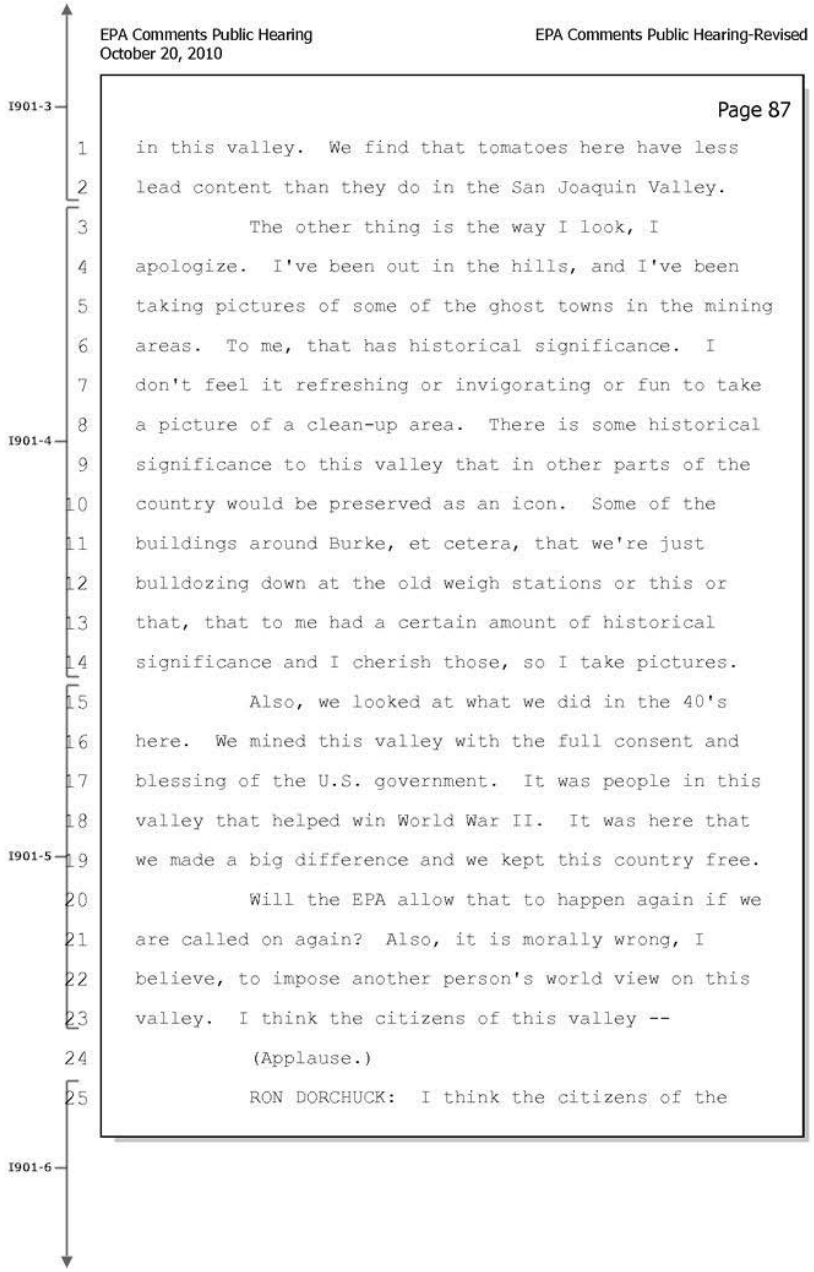
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment.

Response to comment I901-2

See response to Comment No. I295-1.

Response to comment I901-3

Comment noted.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 87

I901-3

in this valley. We find that tomatoes here have less lead content than they do in the San Joaquin Valley.

The other thing is the way I look, I apologize. I've been out in the hills, and I've been taking pictures of some of the ghost towns in the mining areas. To me, that has historical significance. I don't feel it refreshing or invigorating or fun to take a picture of a clean-up area. There is some historical

I901-4

significance to this valley that in other parts of the country would be preserved as an icon. Some of the buildings around Burke, et cetera, that we're just bulldozing down at the old weigh stations or this or that, that to me had a certain amount of historical significance and I cherish those, so I take pictures.

Also, we looked at what we did in the 40's here. We mined this valley with the full consent and blessing of the U.S. government. It was people in this valley that helped win World War II. It was here that

I901-5

we made a big difference and we kept this country free.

Will the EPA allow that to happen again if we are called on again? Also, it is morally wrong, I believe, to impose another person's world view on this valley. I think the citizens of this valley --

(Applause.)

RON DORCHUCK: I think the citizens of the

I901-6

Response to comment I901-4

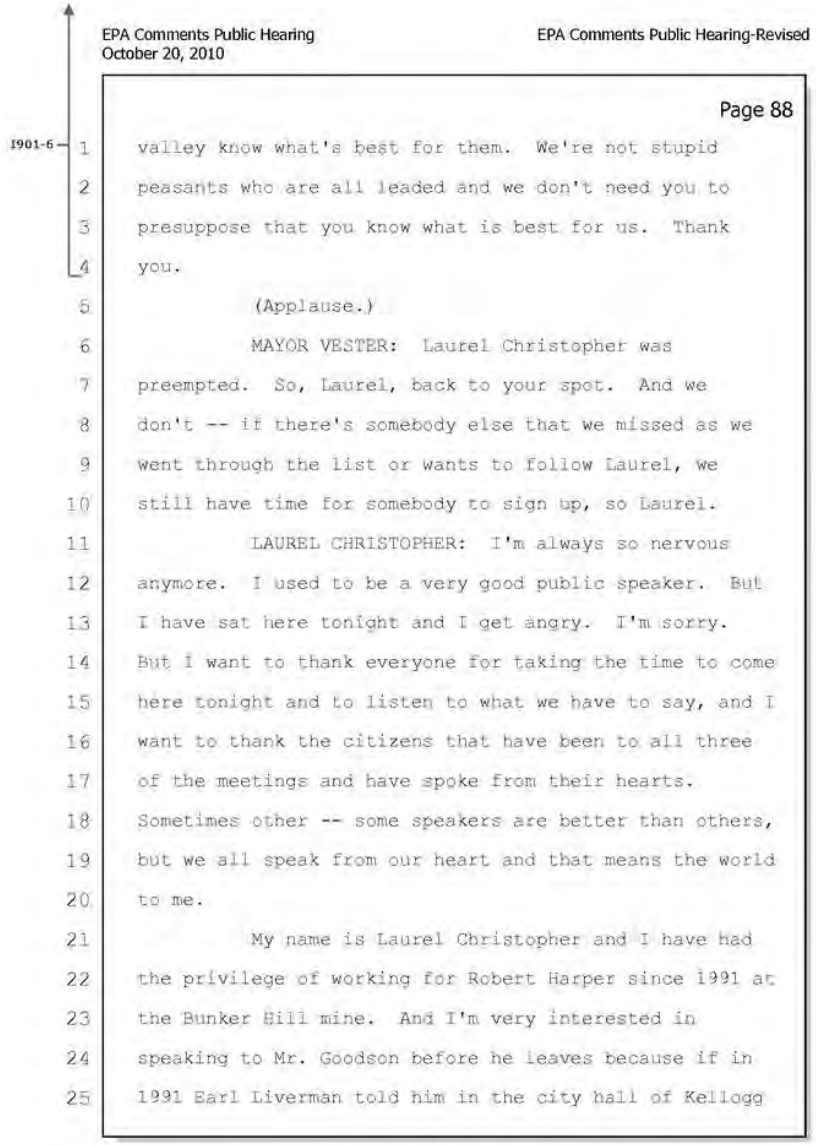
See response to Comment No. I822-11.

Response to comment I901-5

Comment noted.

Response to comment I901-6

See response to Comment No. I295-2.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 88

I901-6

valley know what's best for them. We're not stupid peasants who are all leaded and we don't need you to presuppose that you know what is best for us. Thank you.

(Applause.)

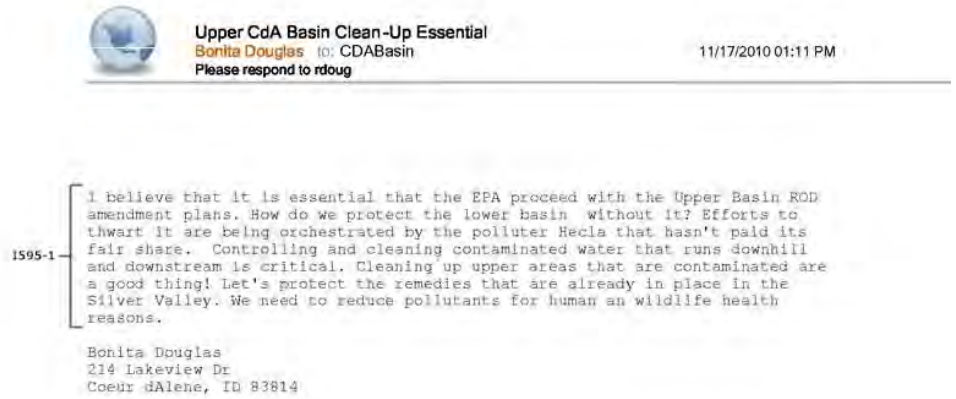
MAYOR VESTER: Laurel Christopher was preempted. So, Laurel, back to your spot. And we don't -- if there's somebody else that we missed as we went through the list or wants to follow Laurel, we still have time for somebody to sign up, so Laurel.

LAUREL CHRISTOPHER: I'm always so nervous anymore. I used to be a very good public speaker. But I have sat here tonight and I get angry. I'm sorry. But I want to thank everyone for taking the time to come here tonight and to listen to what we have to say, and I want to thank the citizens that have been to all three of the meetings and have spoke from their hearts. Sometimes other -- some speakers are better than others, but we all speak from our heart and that means the world to me.

My name is Laurel Christopher and I have had the privilege of working for Robert Harper since 1991 at the Bunker Hill mine. And I'm very interested in speaking to Mr. Goodson before he leaves because if in 1991 Earl Liverman told him in the city hall of Kellogg

No comments

Douglas, Bonita, I595, Letter 617776



Upper CdA Basin Clean-Up Essential
Bonita Douglas to: CDABasin 11/17/2010 01:11 PM
Please respond to rdoug

I595-1 I believe that it is essential that the EPA proceed with the Upper Basin ROD amendment plans. How do we protect the lower basin without it? Efforts to thwart it are being orchestrated by the polluter Hecla that hasn't paid its fair share. Controlling and cleaning contaminated water that runs downhill and downstream is critical. Cleaning up upper areas that are contaminated are a good thing! Let's protect the remedies that are already in place in the Silver Valley. We need to reduce pollutants for human an wildlife health reasons.

Bonita Douglas
214 Lakeview Dr
Coeur dAlene, ID 83814

617776

Response to comment I595-1

See response to Comment No. I295-1.

Driskell, James, I369, Letter 616256

Fw: EPA deadline
Anne Dailey To: cdabasin 11/15/2010 01:42 PM

Anne Dailey
U.S. Environmental Protection Agency
1200 Sixth Avenue Suite 900 (MS ECL-113)
Seattle, WA 98101
ph - 206/553-2110 / fax - 206/553-0124
dailey.anne@epa.gov
http://yosemite.epa.gov/r10/cleanup.nsf/sites/cda

--- Forwarded by Anne Dailey/R10/USEPA/US on 11/15/2010 01:38 PM ---

From: "West Pack, Incorporated" <westpack@usamedia.tv>
To: Anne McCauley/R10/USEPA/US@EPA, Bill Adams/R10/USEPA/US@EPA, Anne Dailey/R10/USEPA/US@EPA
Cc: <rbond@shoshonenewspress.com>, <jthompson@cdapress.com>
Date: 11/15/2010 01:34 PM
Subject: EPA deadline

Please add this to your list of comments that you'll be addressing.

I369-1 The fact that the general public has until November 23rd to submit their comments to the EPA would suggest that there should be a deadline for the EPA to respond to our comments. You give yourselves until "sometime in 2011". It seems ridiculous that you could even consider in excess of a year a reasonable time frame to address the comments that have been submitted, especially considering the fact that this time-frame will mean operating in the blind through next summer's season.

I369-2 The fact that noone of any importance from the EPA showed up in the Silver Valley for any of the public meetings is proof enough to myself that the EPA is not taking public comments seriously. You are merely going through the motions of public input which will be addressed or not addressed by sometime next year when the ROD will be recorded with no further input from the residents of the Silver Valley! A conversation, arguement or debate where people are deciding together (a.k.a. cooperating) requires TWO parties participating and I don't believe the EPA has nor intends to communicate in any way, shape or form before making a decision.

I369-3 I own property which is slated to be remediated next year and I withdraw ANY cooperation on having an EPA contractor on my land if the ROD commits to a time frame of more than 20 additional years of operation in the Silver Valley.

It's time for the residents of this valley to take matters into our own hands and tell the EPA to finish this project in a timely manner with a reasonable budget or just pull out now due to lack of cooperation.

I369-4 With silver nearing $30.00 per ounce, why is this valley still depressed? The answer can be summed up in 3 letters, EPA!

You claim to want to work "with" mining companies but by your own admittance on your "tour" of the box; you're involved in litigation with most of the mining companies that are operating or have operated here in the valley. If this is not a discouragement to the local businesses and economy, I don't know what is.

Sincerely,

616256

Response to comment I369-1

See responses to Comment Nos. I295-2 and I54-6.

Response to comment I369-2

See responses to Comment Nos. I295-2 and LJ39-5.

Response to comment I369-3

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. See response to Comment No. I58-1 regarding duration of the Selected Remedy.

Response to comment I369-4

See responses to Comment Nos. I58-5 and I54-2.

No comments

James Driskell
Silver Valley Resident

Original Message-----
From: Lindsay.Andrea@epamail.epa.gov [mailto:Lindsay.Andrea@epamail.epa.gov]
Sent: Monday, November 15, 2010 12:39 PM
To: undisclosed-recipients
Subject: EPA Proposed Cleanup Plan: Status of Public Comments

Many people are wondering how EPA is handling public comments on the Proposed Cleanup Plan for the Upper Basin, and when they might hear something back. Here are answers those questions.

The public comment period on EPA's Proposed Cleanup Plan closes November 23. EPA has received hundreds of comments. It will take time for the agency to consider and respond to all of them. EPA takes each comment seriously. The agency is aware that the cleanup is complex, and is a topic which is deeply important to local citizens. EPA has received comments both in favor of and against the plan. EPA will consider changes to the proposed cleanup plan in response to public input.

All comments are being entered into an electronic database. Comments will be logged individually and in categories. This process ensures that each comment is accounted for and helps with an orderly, thorough response. The agency will prepare a document called a "Response to Comments." It will include both a response to each comment and a summary response to each issue.

The Response to Comments will be issued to the public at the same time as the ROD (Record of Decision) Amendment, sometime in 2011. The ROD Amendment is the final decision document. It will describe the selected cleanup alternative. The public will be able to request a hard copy of these documents and find them at select local libraries and on EPA's website.

In the meantime, feel free to contact one of the EPA Project Managers listed below.
Bill Adams, adams.bill@epa.gov, 206-553-2806
Anne Dailey, dailey.anne@epa.gov, 206-553-2110
Anne McCauley, mccauley.anne@epa.gov, 206--553-4689
Or, call toll-free 800-424-4372

Website: http://go.usa.gov/igD

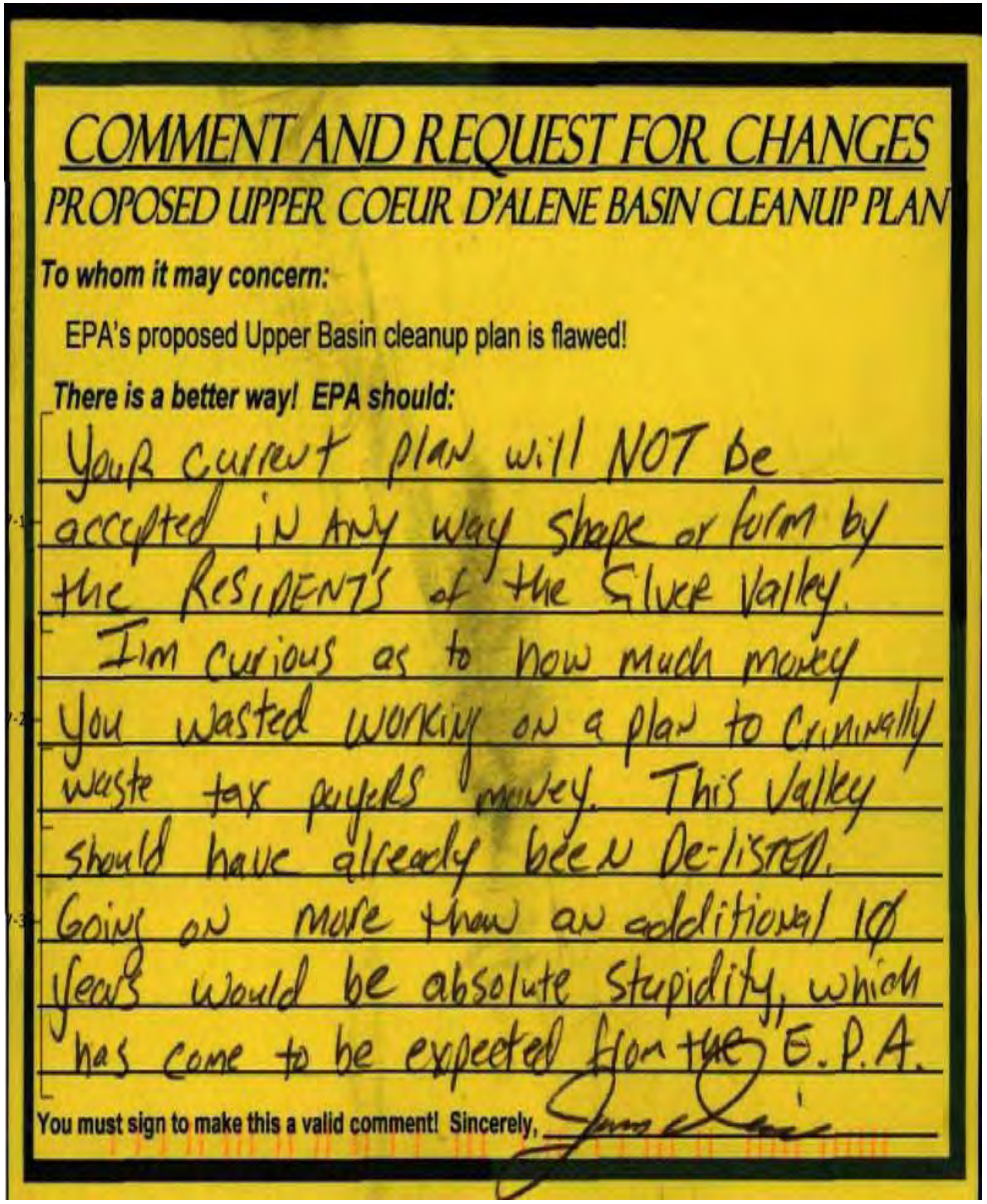
****

No comments

Andrea Lindsay
Community Involvement Coordinator
EPA, 1200 6th Avenue, Suite 900
Seattle, WA 98101
206/553-1896
Work days: Mon, Thurs, Fri

Sign up for EPA R10's Water News Listserv at
www.epa.gov/r10earth/watertalk.htm

Driskell, J., I457, Letter 1308794



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

I-1 Your current plan will NOT be accepted in any way shape or form by the RESIDENTS of the Silver Valley.

I-2 I'm curious as to how much money you wasted working on a plan to Criminally waste tax payers money. This Valley should have already been De-listed.

I-3 Going on more than an additional 10 years would be absolute stupidity, which has come to be expected from the E.P.A.

You must sign to make this a valid comment! Sincerely,

Response to comment I457-1

Comment noted.

Response to comment I457-2

EPA believes that money spent on investigation and development of a cleanup plan for the Upper Basin has been appropriate in relation to the magnitude of the human health and environmental risk. EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. EPA is also required under CERCLA to provide a Proposed Plan for comment by the local community.

Response to comment I457-3

Comment noted.

Driskell, J., I596, Letter 617777

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
northidahogems@gmail.com to: formsubmission 11/17/2010 12:35 PM
Sent by: Northidahogems@Gmail.Com <northidahogems=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: James Driskell
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: northidahogems@gmail.com
Mailing Address: 8851 Coeur d Alene River Road|Kingston|Id|83839|US
Phone Number: (208) 659-2709

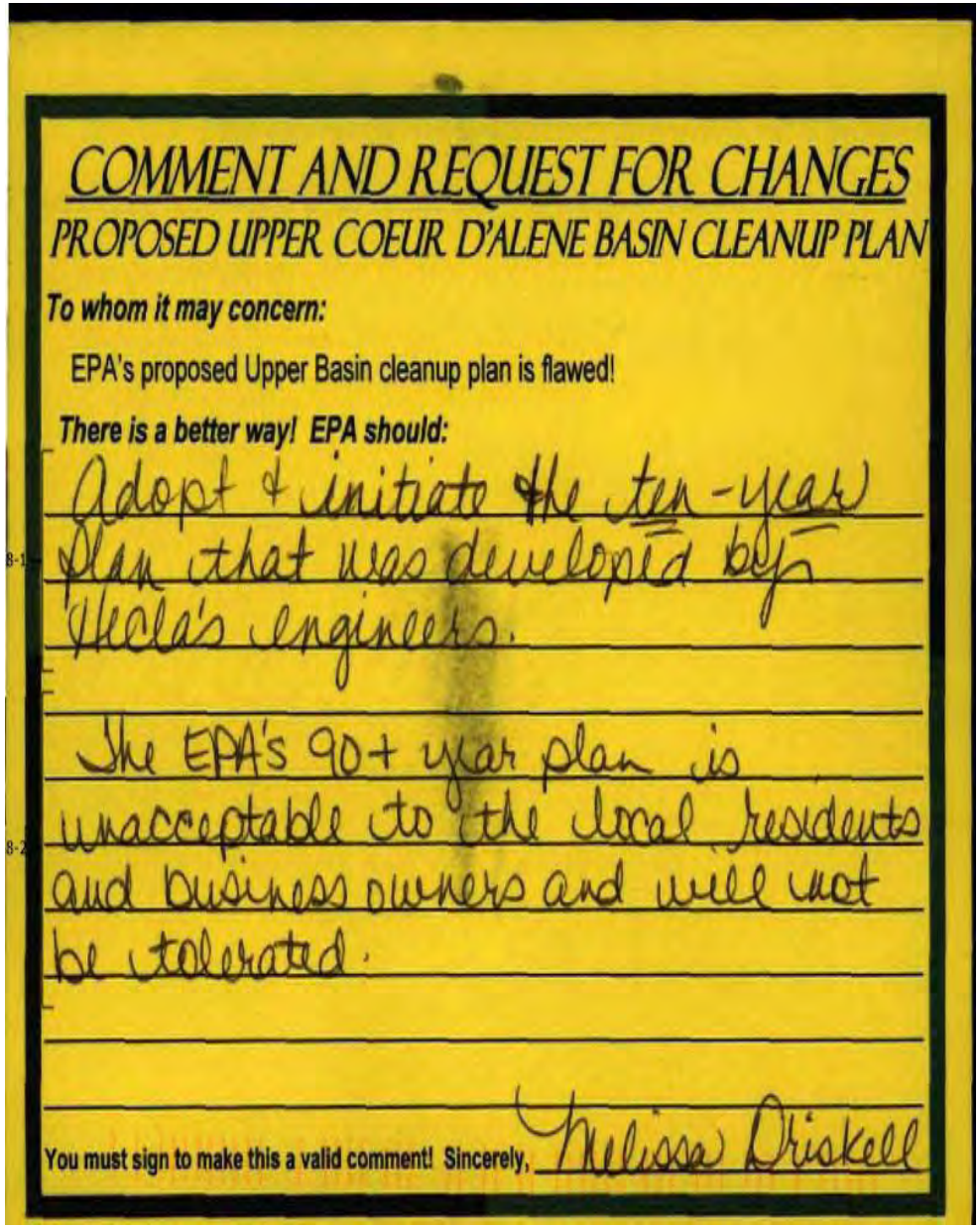
I596-1

617777

Response to comment I596-1

See response to Comment No. I351-1.

Driskell, Melissa, I458, Letter 1308795



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

Adopt & initiate the ten-year plan that was developed by Hecla's engineers.

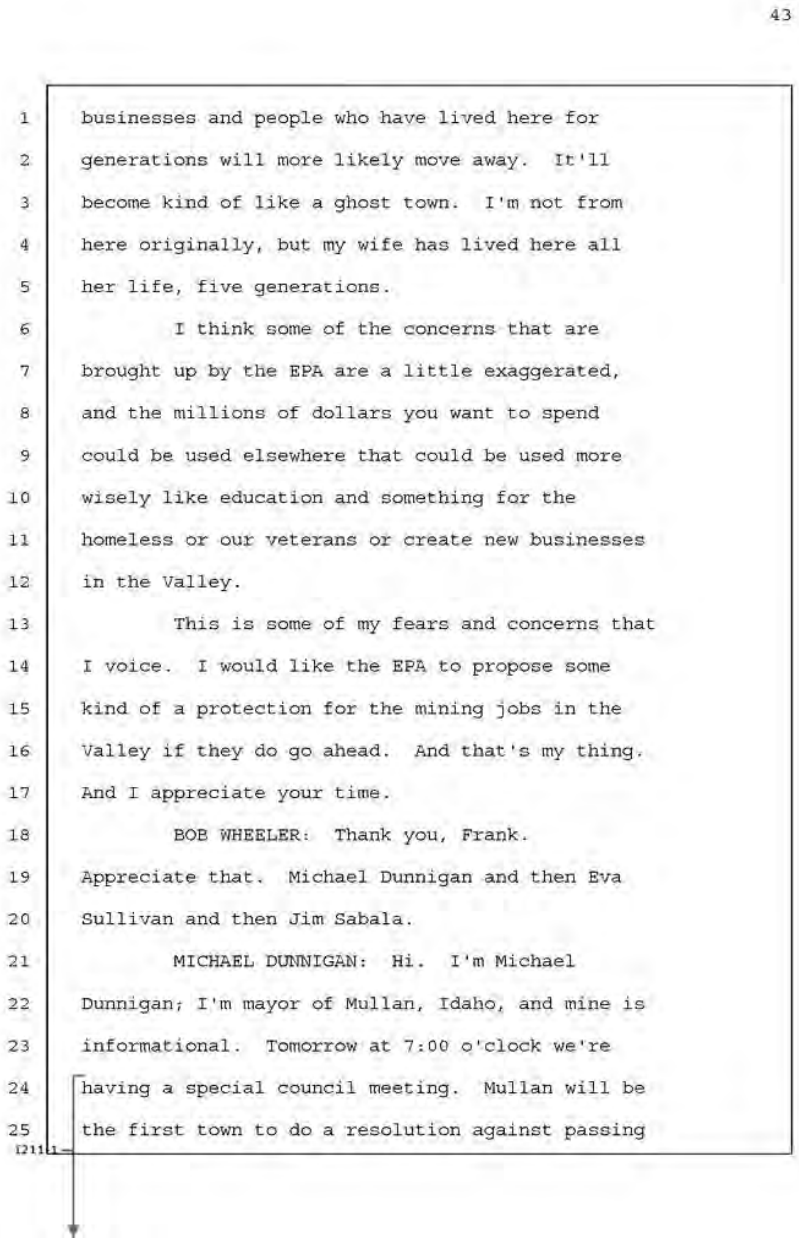
The EPA's 90+ year plan is unacceptable to the local residents and business owners and will not be tolerated.

You must sign to make this a valid comment! Sincerely, Melissa Driskell

Response to comment I458-1
See response to Comment No. I474-2.

Response to comment I458-2
See response to Comment No. I58-1.

Dunnigan, Michael, I211, Letter 610097-6



43

businesses and people who have lived here for generations will more likely move away. It'll become kind of like a ghost town. I'm not from here originally, but my wife has lived here all her life, five generations.

I think some of the concerns that are brought up by the EPA are a little exaggerated, and the millions of dollars you want to spend could be used elsewhere that could be used more wisely like education and something for the homeless or our veterans or create new businesses in the Valley.

This is some of my fears and concerns that I voice. I would like the EPA to propose some kind of a protection for the mining jobs in the Valley if they do go ahead. And that's my thing. And I appreciate your time.

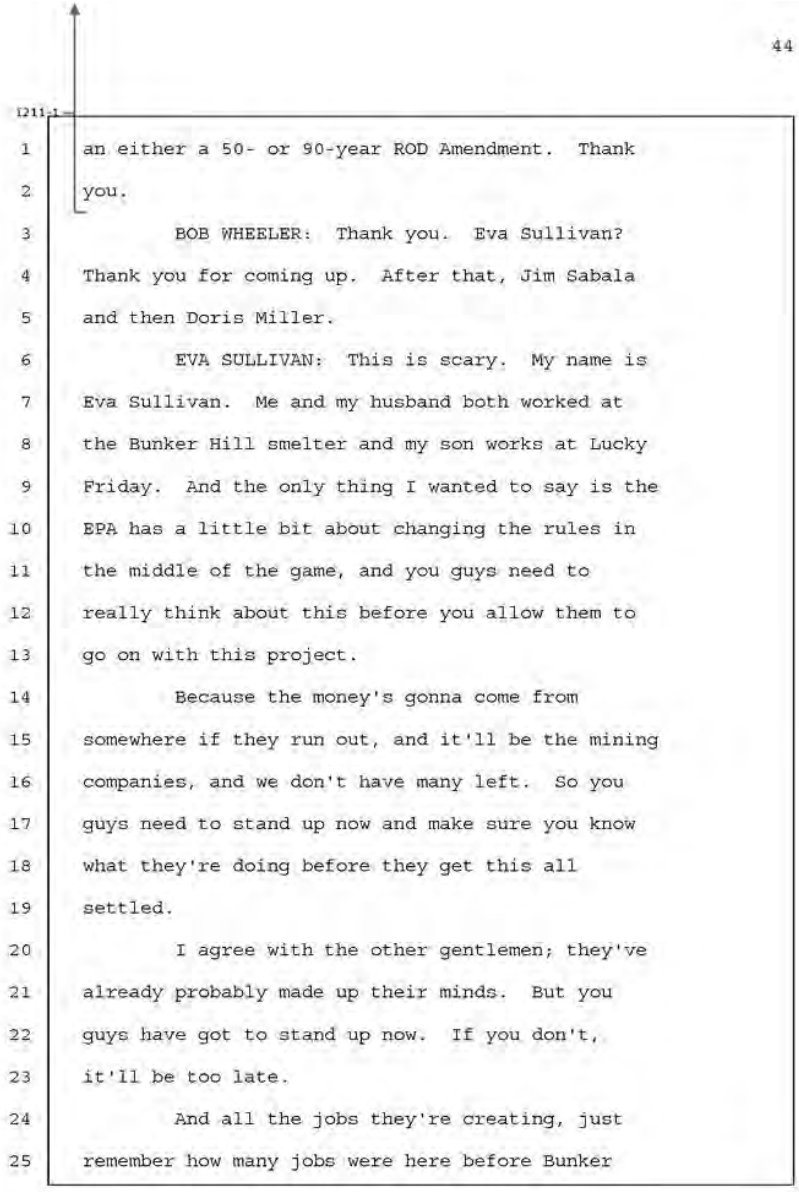
BOB WHEELER: Thank you, Frank. Appreciate that. Michael Dunnigan and then Eva Sullivan and then Jim Sabala.

MICHAEL DUNNIGAN: Hi. I'm Michael Dunnigan; I'm mayor of Mullan, Idaho, and mine is informational. Tomorrow at 7:00 o'clock we're having a special council meeting. Mullan will be the first town to do a resolution against passing

I211-1

Response to comment I211-1

Comment noted. See response to Comment No. I58-1.



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I211.1

an either a 50- or 90-year ROD Amendment. Thank you.

BOB WHEELER: Thank you. Eva Sullivan? Thank you for coming up. After that, Jim Sabala and then Doris Miller.

EVA SULLIVAN: This is scary. My name is Eva Sullivan. Me and my husband both worked at the Bunker Hill smelter and my son works at Lucky Friday. And the only thing I wanted to say is the EPA has a little bit about changing the rules in the middle of the game, and you guys need to really think about this before you allow them to go on with this project.

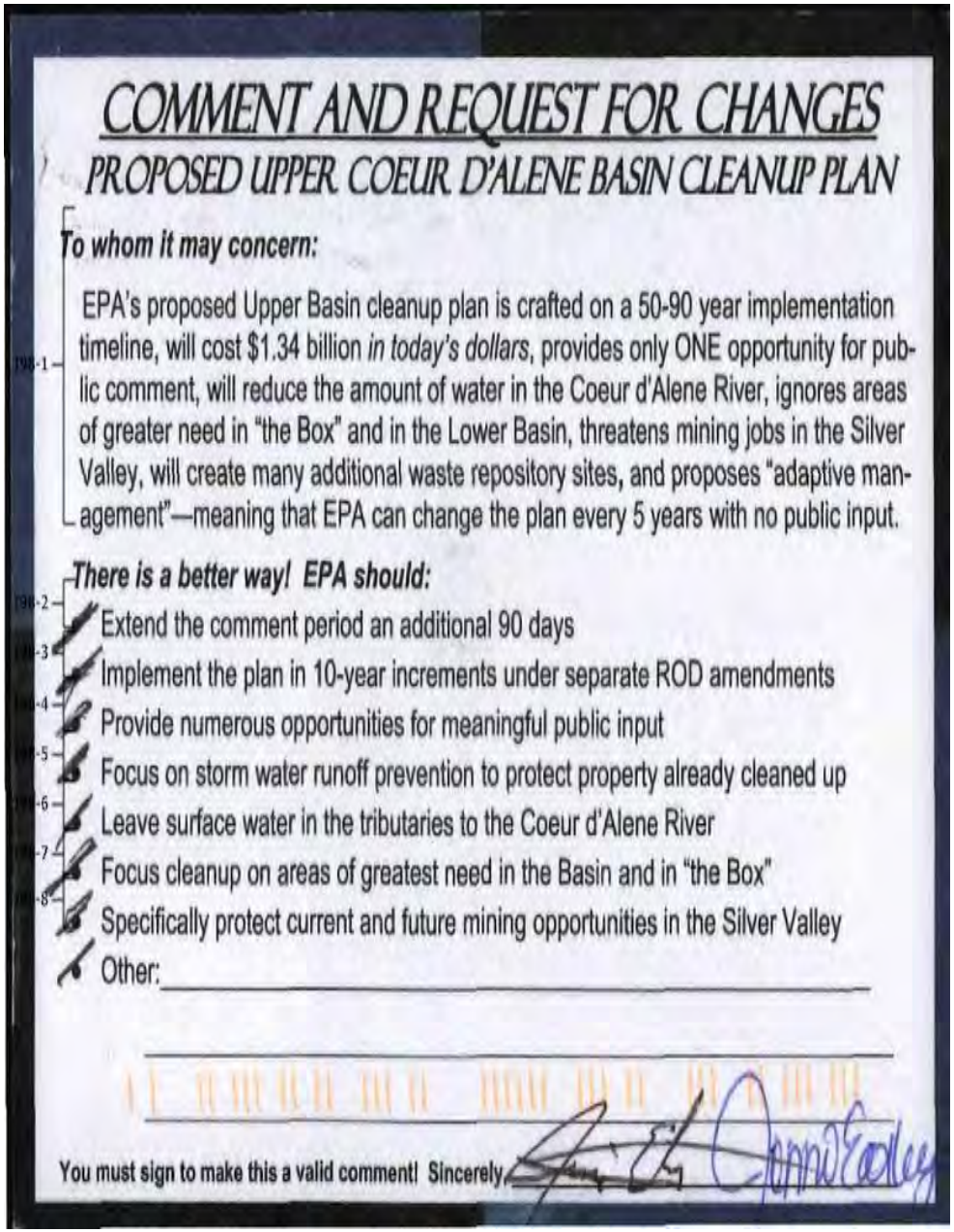
Because the money's gonna come from somewhere if they run out, and it'll be the mining companies, and we don't have many left. So you guys need to stand up now and make sure you know what they're doing before they get this all settled.

I agree with the other gentlemen; they've already probably made up their minds. But you guys have got to stand up now. If you don't, it'll be too late.

And all the jobs they're creating, just remember how many jobs were here before Bunker

No comments

Easley, Jonni, I98, Letter 1357145



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I98-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I98-2 ☑ Extend the comment period an additional 90 days

I98-3 ☑ Implement the plan in 10-year increments under separate ROD amendments

I98-4 ☑ Provide numerous opportunities for meaningful public input

I98-5 ☑ Focus on storm water runoff prevention to protect property already cleaned up

I98-6 ☑ Leave surface water in the tributaries to the Coeur d'Alene River

I98-7 ☑ Focus cleanup on areas of greatest need in the Basin and in "the Box"

I98-8 ☑ Specifically protect current and future mining opportunities in the Silver Valley

☑ Other: _____

You must sign to make this a valid comment! Sincerely, Jonni Easley

Response to comment I98-1
See response to Comment No. I25-1.

Response to comment I98-2
See response to Comment No. I25-2.

Response to comment I98-3
See response to Comment No. I25-3.

Response to comment I98-4
See response to Comment No. I25-4.

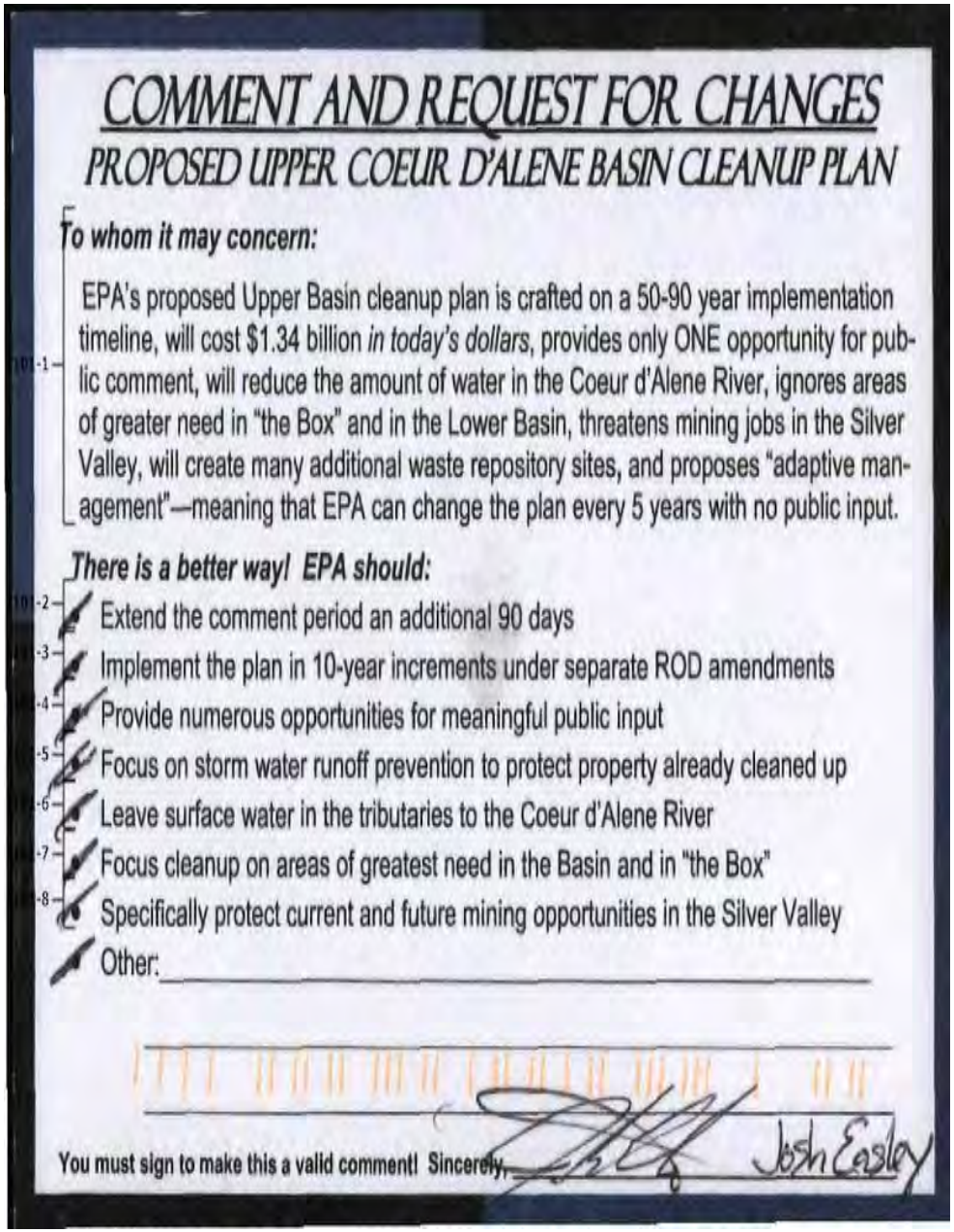
Response to comment I98-5
See response to Comment No. I25-5.

Response to comment I98-6
See response to Comment No. I25-6.

Response to comment I98-7
See response to Comment No. I25-7.

Response to comment I98-8
See response to Comment No. I25-8.

Easley, Josh, I101, Letter 1357148



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I101-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I101-2 ✓ Extend the comment period an additional 90 days

I101-3 ✓ Implement the plan in 10-year increments under separate ROD amendments

I101-4 ✓ Provide numerous opportunities for meaningful public input

I101-5 ✓ Focus on storm water runoff prevention to protect property already cleaned up

I101-6 ✓ Leave surface water in the tributaries to the Coeur d'Alene River

I101-7 ✓ Focus cleanup on areas of greatest need in the Basin and in "the Box"

I101-8 ✓ Specifically protect current and future mining opportunities in the Silver Valley

✓ Other: _____

You must sign to make this a valid comment! Sincerely, Josh Easley

Response to comment I101-1
See response to Comment No. I25-1.

Response to comment I101-2
See response to Comment No. I25-2.

Response to comment I101-3
See response to Comment No. I25-3.

Response to comment I101-4
See response to Comment No. I25-4.

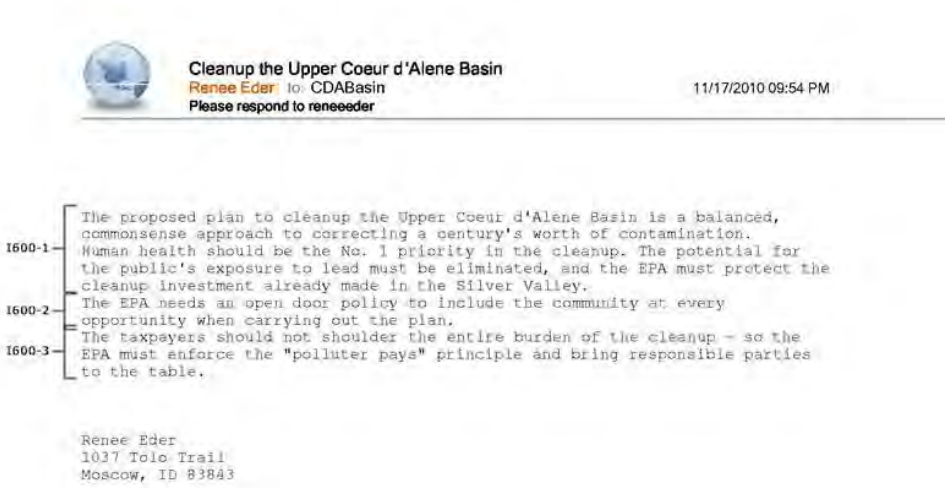
Response to comment I101-5
See response to Comment No. I25-5.

Response to comment I101-6
See response to Comment No. I25-6.

Response to comment I101-7
See response to Comment No. I25-7.

Response to comment I101-8
See response to Comment No. I25-8.

Eder, Renee, I600, Letter 617781



Cleanup the Upper Coeur d'Alene Basin
Renee Eder to: CDABasin 11/17/2010 09:54 PM
Please respond to reneeeder

I600-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I600-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I600-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Renee Eder
1037 Tolo Trail
Moscow, ID 83843

617781

Response to comment I600-1

See response to Comment No. I295-1.

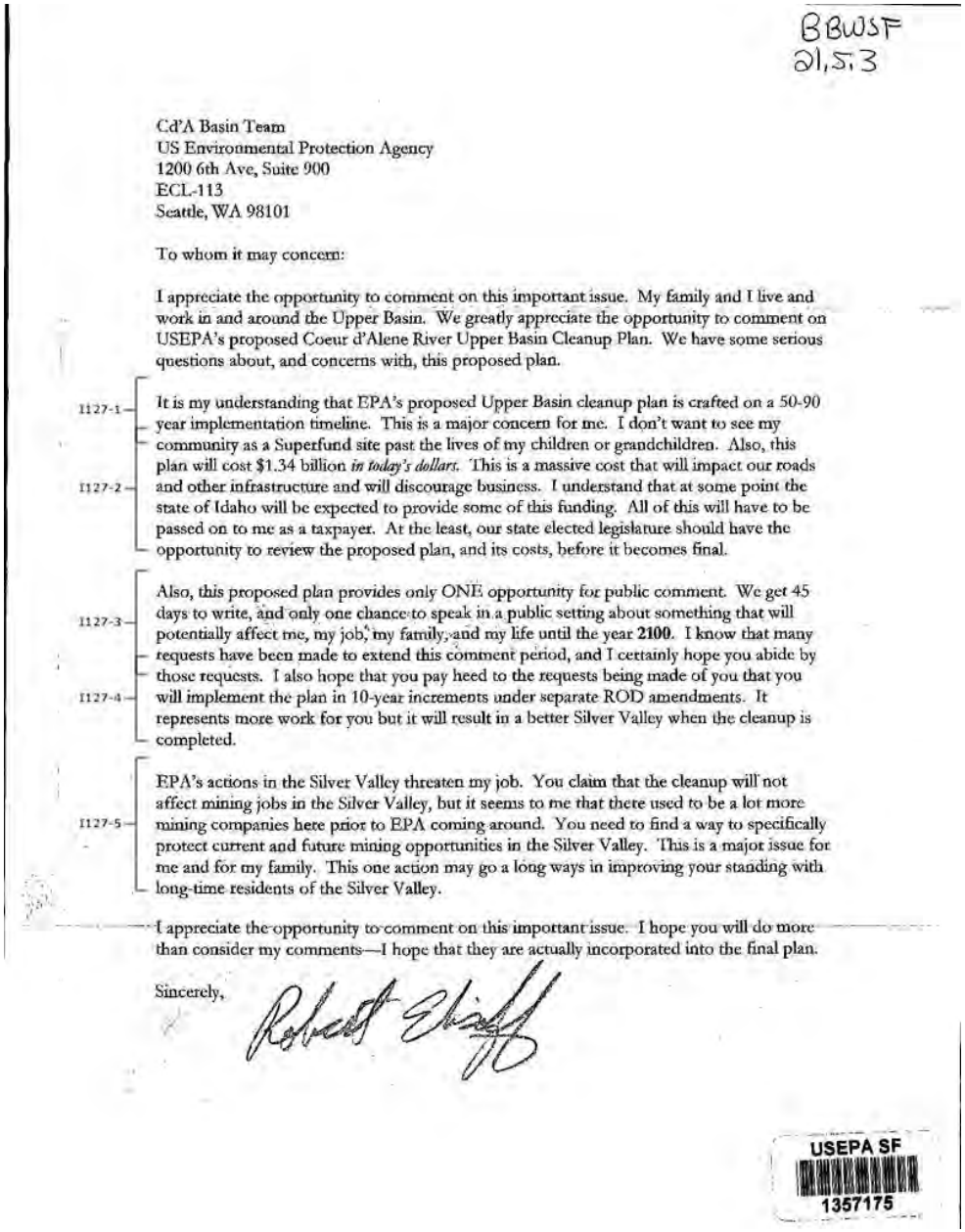
Response to comment I600-2

See response to Comment No. I295-2.

Response to comment I600-3

See response to Comment No. I295-3.

Elisoff, Robert, I127, Letter 1357175



BBWSF
21,5,3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I127-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I127-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I127-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I127-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I127-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Robert Elisoff

USEPA SF
1357175

Response to comment I127-1
See response to Comment No. I58-1.

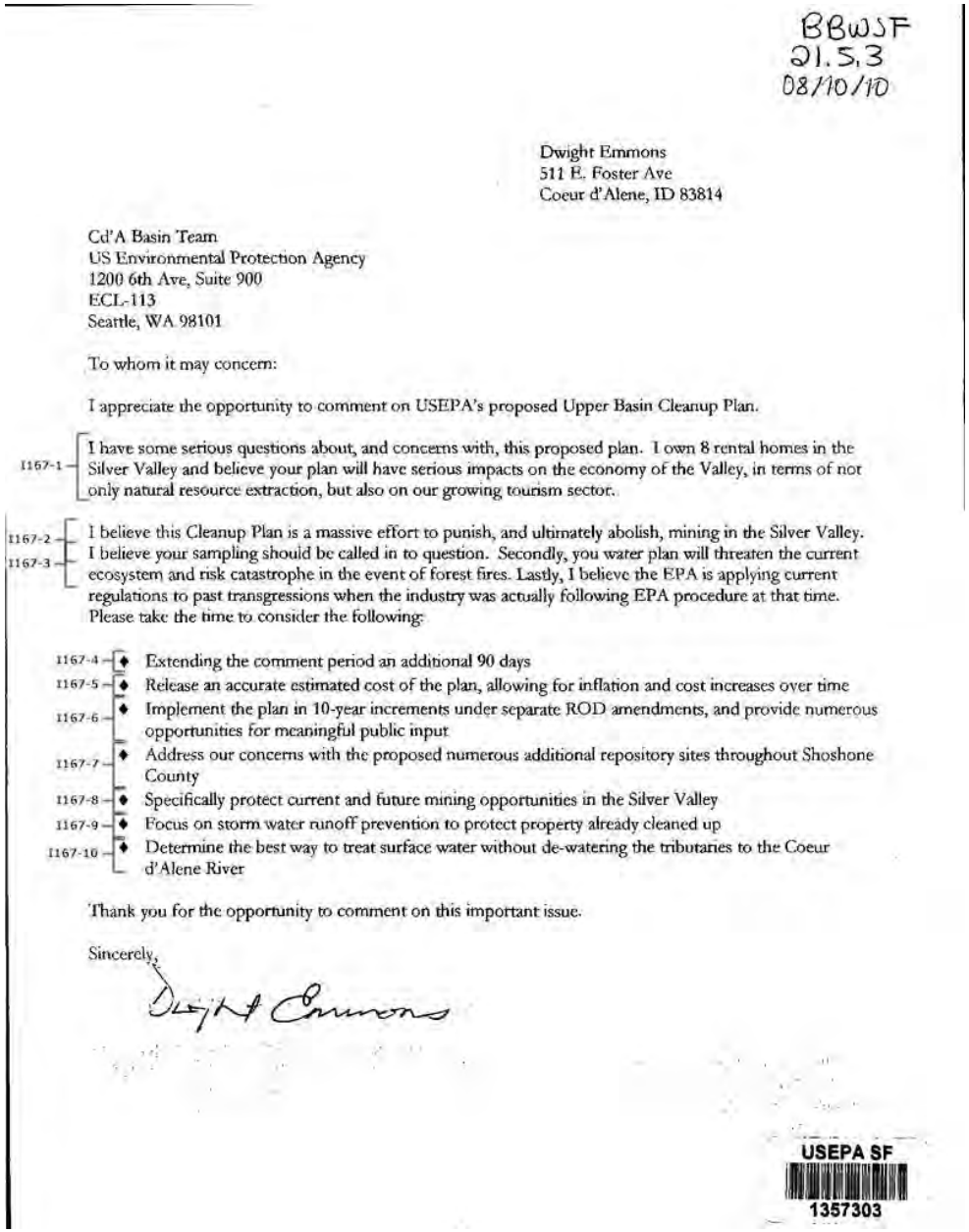
Response to comment I127-2
See response to Comment No. I58-2.

Response to comment I127-3
See response to Comment No. I58-3.

Response to comment I127-4
See response to Comment No. I58-4.

Response to comment I127-5
See response to Comment No. I58-5.

Emmons, Dwight, I167, Letter 1357303



BBWSF
21.5.3
08/10/10

Dwight Emmons
511 E. Foster Ave
Coeur d'Alene, ID 83814

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on USEPA's proposed Upper Basin Cleanup Plan.

I167-1 I have some serious questions about, and concerns with, this proposed plan. I own 8 rental homes in the Silver Valley and believe your plan will have serious impacts on the economy of the Valley, in terms of not only natural resource extraction, but also on our growing tourism sector.

I167-2 I believe this Cleanup Plan is a massive effort to punish, and ultimately abolish, mining in the Silver Valley.
I167-3 I believe your sampling should be called in to question. Secondly, you water plan will threaten the current ecosystem and risk catastrophe in the event of forest fires. Lastly, I believe the EPA is applying current regulations to past transgressions when the industry was actually following EPA procedure at that time.
Please take the time to consider the following:

- I167-4 Extending the comment period an additional 90 days
- I167-5 Release an accurate estimated cost of the plan, allowing for inflation and cost increases over time
- I167-6 Implement the plan in 10-year increments under separate ROD amendments, and provide numerous opportunities for meaningful public input
- I167-7 Address our concerns with the proposed numerous additional repository sites throughout Shoshone County
- I167-8 Specifically protect current and future mining opportunities in the Silver Valley
- I167-9 Focus on storm water runoff prevention to protect property already cleaned up
- I167-10 Determine the best way to treat surface water without de-watering the tributaries to the Coeur d'Alene River

Thank you for the opportunity to comment on this important issue.

Sincerely,

Dwight Emmons

USEPA SF
1357303

Response to comment I167-1
See responses to Comment Nos. I54-2 and I58-5.

Response to comment I167-2
See response to Comment No. I58-5. Environmental monitoring conducted at the Bunker Hill Superfund Site is performed using standard methods and procedures developed by EPA and USGS for environmental sampling. Environmental samples are analyzed by laboratories with state-of-the-art analytical methods. Field and laboratory quality control procedures are implemented to ensure data quality is achieved.

Response to comment I167-3
See response to Comment No. I54-8.

Response to comment I167-4
See response to Comment No. I54-6.

Response to comment I167-5
See response to Comment No. I54-12.

Response to comment I167-6
See responses to Comment Nos. I58-4 and LJ11-2.

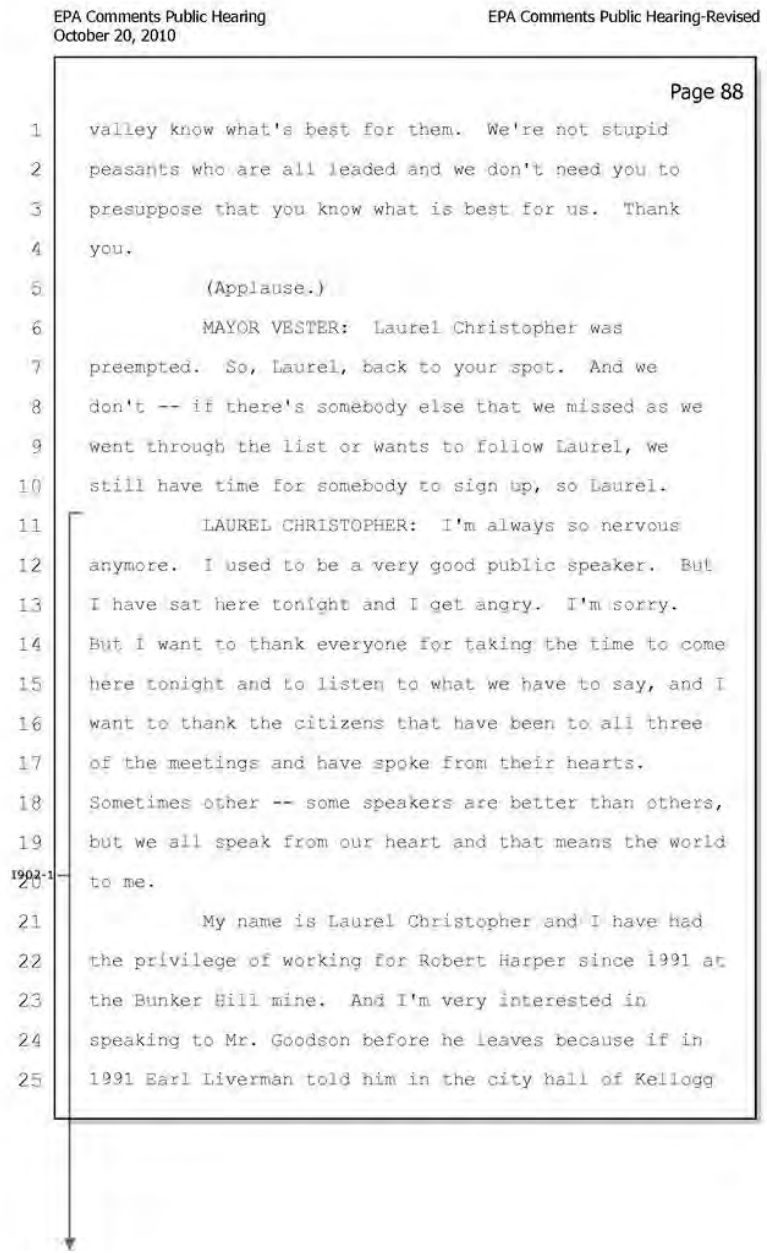
Response to comment I167-7
See response to Comment No. I54-3.

Response to comment I167-8
See response to Comment No. I58-5.

Response to comment I167-9
See response to Comment No. I54-5.

Response to comment I167-10
See response to Comment No. I54-8.

Employee of Bunker Hill Mine, I902, Letter 619651-37



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valley know what's best for them. We're not stupid peasants who are all leaded and we don't need you to presuppose that you know what is best for us. Thank you.

(Applause.)

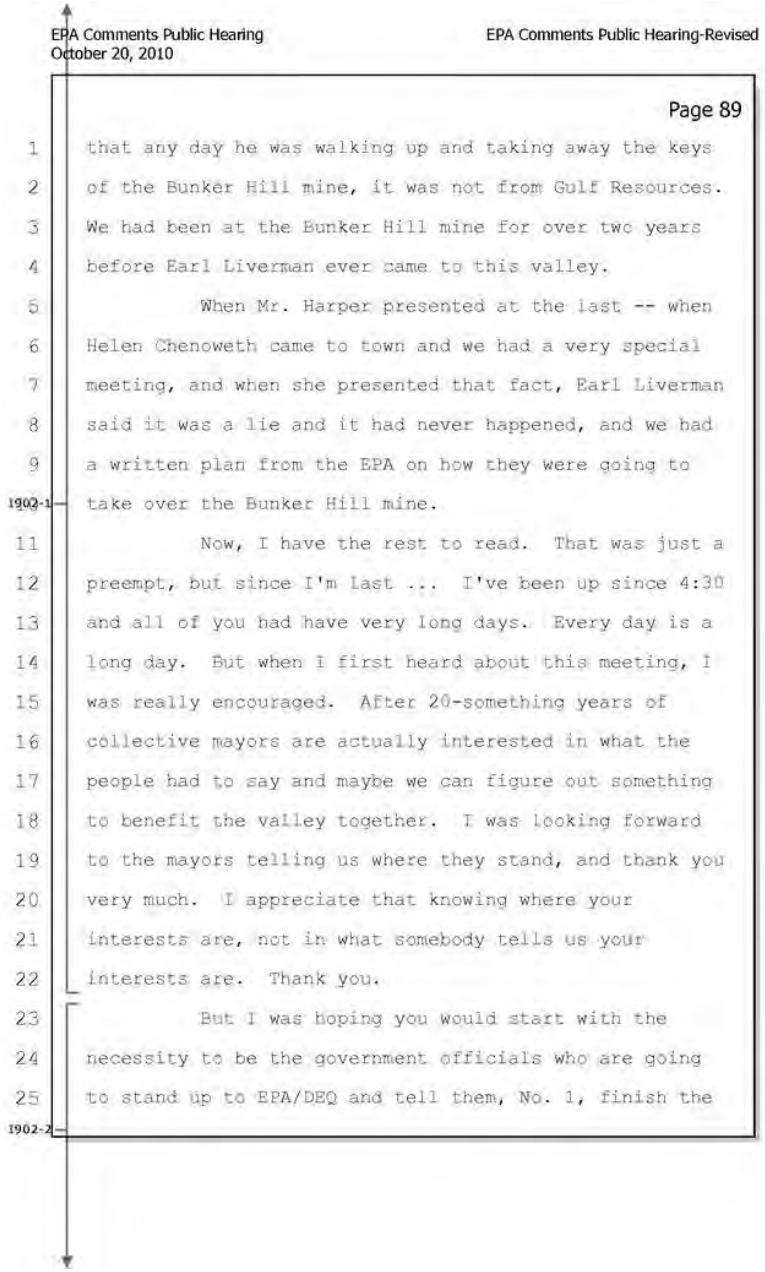
MAYOR VESTER: Laurel Christopher was preempted. So, Laurel, back to your spot. And we don't -- if there's somebody else that we missed as we went through the list or wants to follow Laurel, we still have time for somebody to sign up, so Laurel.

LAUREL CHRISTOPHER: I'm always so nervous anymore. I used to be a very good public speaker. But I have sat here tonight and I get angry. I'm sorry. But I want to thank everyone for taking the time to come here tonight and to listen to what we have to say, and I want to thank the citizens that have been to all three of the meetings and have spoke from their hearts. Sometimes other -- some speakers are better than others, but we all speak from our heart and that means the world to me. I902-1

My name is Laurel Christopher and I have had the privilege of working for Robert Harper since 1991 at the Bunker Hill mine. And I'm very interested in speaking to Mr. Goodson before he leaves because if in 1991 Earl Liverman told him in the city hall of Kellogg

Response to comment I902-1

Comment noted.



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October 20, 2010

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that any day he was walking up and taking away the keys of the Bunker Hill mine, it was not from Gulf Resources. We had been at the Bunker Hill mine for over two years before Earl Liverman ever came to this valley.

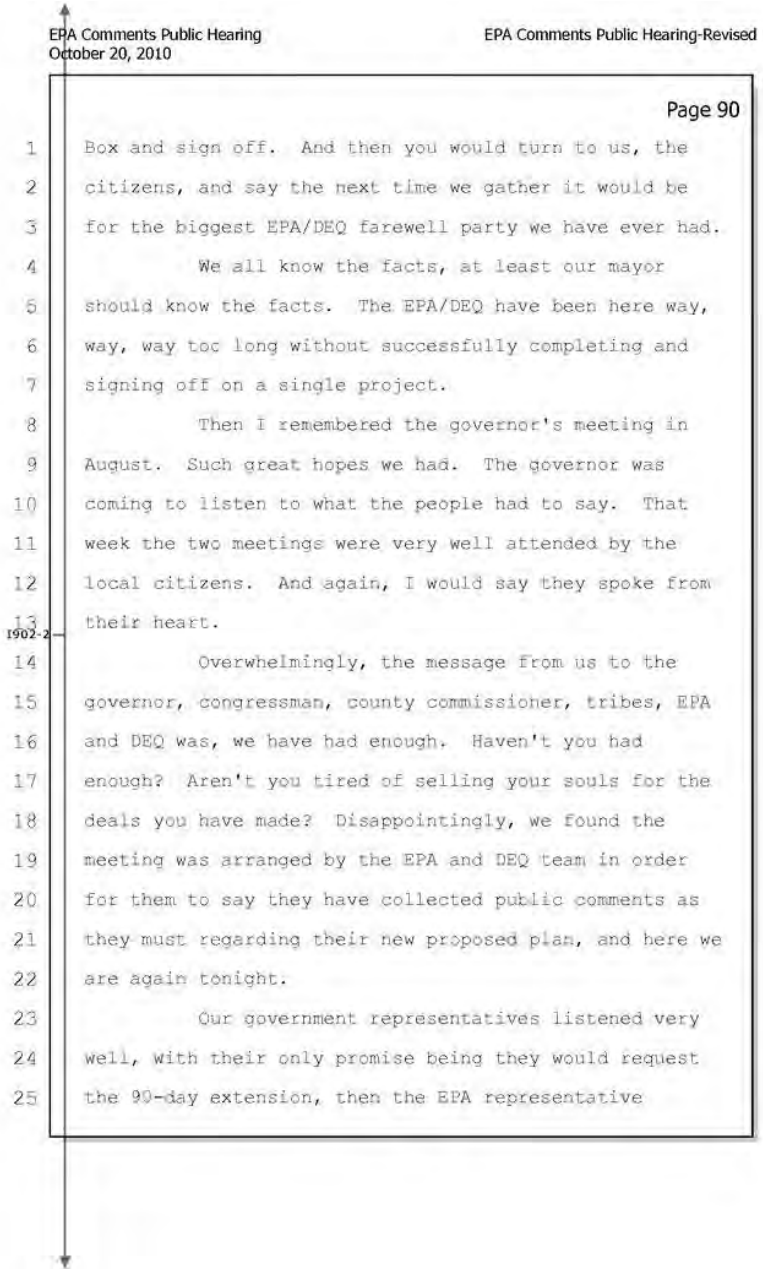
When Mr. Harper presented at the last -- when Helen Chenoweth came to town and we had a very special meeting, and when she presented that fact, Earl Liverman said it was a lie and it had never happened, and we had a written plan from the EPA on how they were going to take over the Bunker Hill mine. 1902-1

Now, I have the rest to read. That was just a preempt, but since I'm last ... I've been up since 4:30 and all of you had have very long days. Every day is a long day. But when I first heard about this meeting, I was really encouraged. After 20-something years of collective mayors are actually interested in what the people had to say and maybe we can figure out something to benefit the valley together. I was looking forward to the mayors telling us where they stand, and thank you very much. I appreciate that knowing where your interests are, not in what somebody tells us your interests are. Thank you.

But I was hoping you would start with the necessity to be the government officials who are going to stand up to EPA/DEQ and tell them, No. 1, finish the 1902-2

Response to comment I902-2

Thank you for your comments.



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Box and sign off. And then you would turn to us, the citizens, and say the next time we gather it would be for the biggest EPA/DEQ farewell party we have ever had.

We all know the facts, at least our mayor should know the facts. The EPA/DEQ have been here way, way, way too long without successfully completing and signing off on a single project.

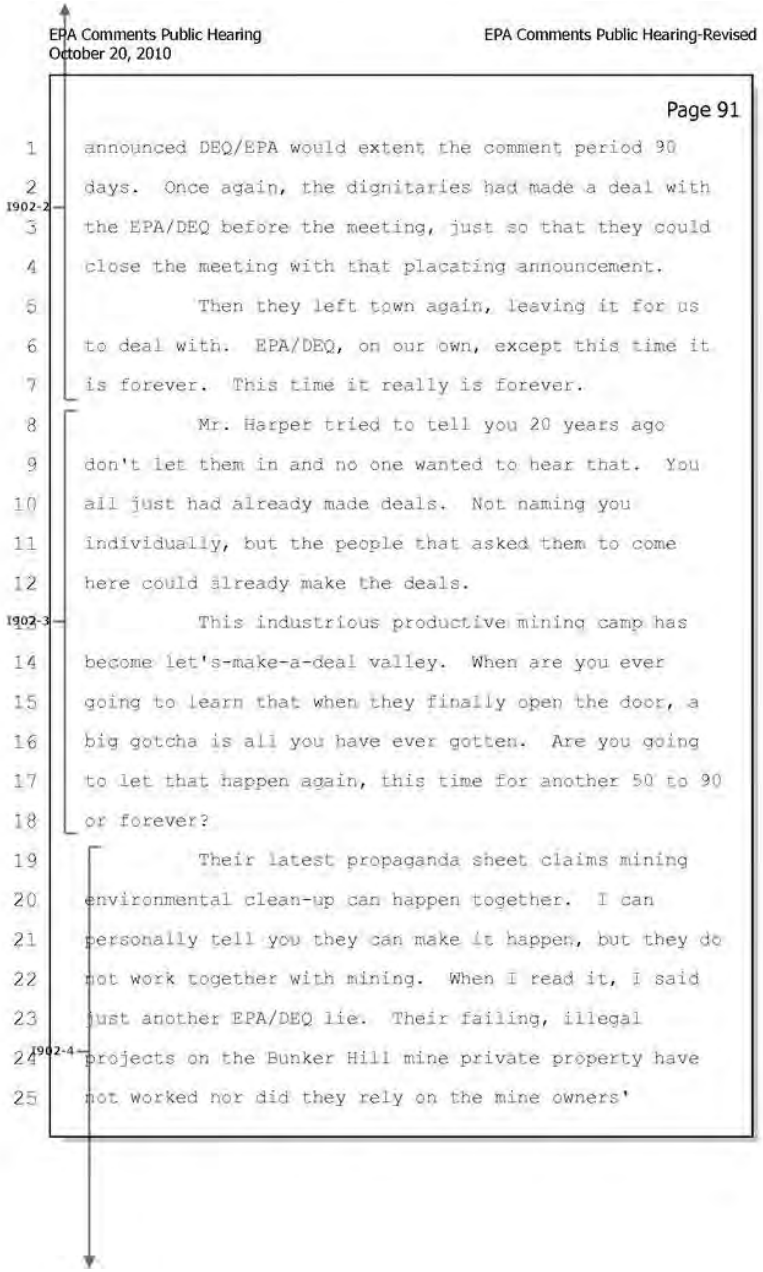
Then I remembered the governor's meeting in August. Such great hopes we had. The governor was coming to listen to what the people had to say. That week the two meetings were very well attended by the local citizens. And again, I would say they spoke from their heart.

I902-2

Overwhelmingly, the message from us to the governor, congressman, county commissioner, tribes, EPA and DEQ was, we have had enough. Haven't you had enough? Aren't you tired of selling your souls for the deals you have made? Disappointingly, we found the meeting was arranged by the EPA and DEQ team in order for them to say they have collected public comments as they must regarding their new proposed plan, and here we are again tonight.

Our government representatives listened very well, with their only promise being they would request the 90-day extension, then the EPA representative

No comments



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announced DEQ/EPA would extent the comment period 90 days. Once again, the dignitaries had made a deal with
I902-2 the EPA/DEQ before the meeting, just so that they could close the meeting with that placating announcement.

Then they left town again, leaving it for us to deal with. EPA/DEQ, on our own, except this time it is forever. This time it really is forever.

Mr. Harper tried to tell you 20 years ago don't let them in and no one wanted to hear that. You all just had already made deals. Not naming you individually, but the people that asked them to come here could already make the deals.

I902-3 This industrious productive mining camp has become let's-make-a-deal valley. When are you ever going to learn that when they finally open the door, a big gotcha is all you have ever gotten. Are you going to let that happen again, this time for another 50 to 90 or forever?

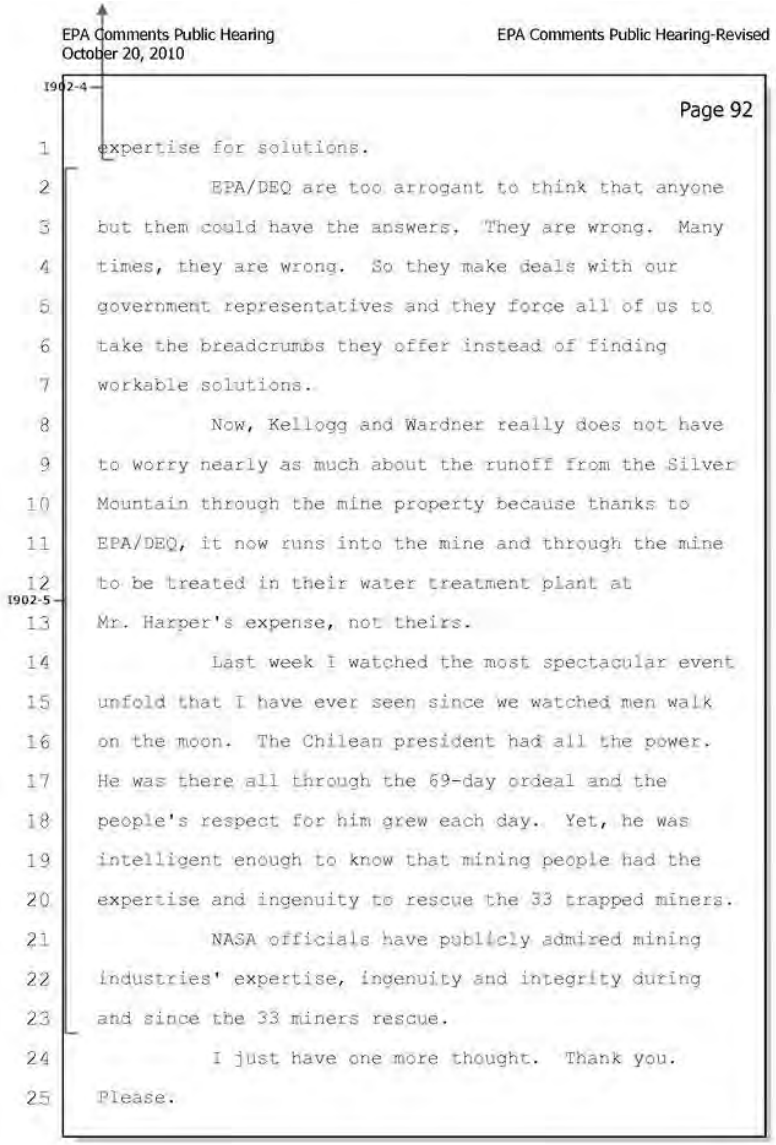
Their latest propaganda sheet claims mining environmental clean-up can happen together. I can personally tell you they can make it happen, but they do not work together with mining. When I read it, I said just another EPA/DEQ lie. Their failing, illegal
I902-4 projects on the Bunker Hill mine private property have not worked nor did they rely on the mine owners'

Response to comment I902-3

Comment noted.

Response to comment I902-4

See response to Comment No. I58-5.



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I902-4

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expertise for solutions.

EPA/DEQ are too arrogant to think that anyone but them could have the answers. They are wrong. Many times, they are wrong. So they make deals with our government representatives and they force all of us to take the breadcrumbs they offer instead of finding workable solutions.

Now, Kellogg and Wardner really does not have to worry nearly as much about the runoff from the Silver Mountain through the mine property because thanks to EPA/DEQ, it now runs into the mine and through the mine to be treated in their water treatment plant at

I902-5

Mr. Harper's expense, not theirs.

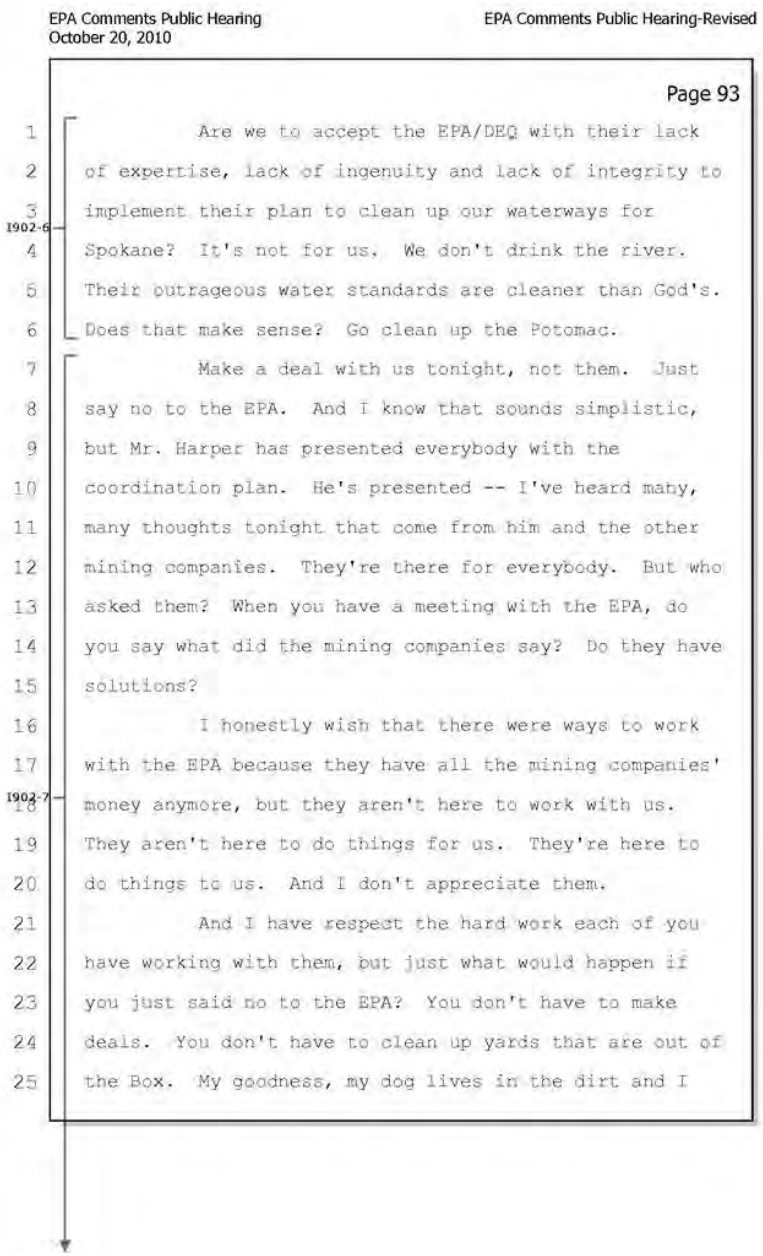
Last week I watched the most spectacular event unfold that I have ever seen since we watched men walk on the moon. The Chilean president had all the power. He was there all through the 69-day ordeal and the people's respect for him grew each day. Yet, he was intelligent enough to know that mining people had the expertise and ingenuity to rescue the 33 trapped miners.

NASA officials have publicly admired mining industries' expertise, ingenuity and integrity during and since the 33 miners rescue.

I just have one more thought. Thank you. Please.

Response to comment I902-5

Comment noted.



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Page 93

Are we to accept the EPA/DEQ with their lack of expertise, lack of ingenuity and lack of integrity to implement their plan to clean up our waterways for Spokane? It's not for us. We don't drink the river. Their outrageous water standards are cleaner than God's. Does that make sense? Go clean up the Potomac.

Make a deal with us tonight, not them. Just say no to the EPA. And I know that sounds simplistic, but Mr. Harper has presented everybody with the coordination plan. He's presented -- I've heard many, many thoughts tonight that come from him and the other mining companies. They're there for everybody. But who asked them? When you have a meeting with the EPA, do you say what did the mining companies say? Do they have solutions?

I honestly wish that there were ways to work with the EPA because they have all the mining companies' money anymore, but they aren't here to work with us. They aren't here to do things for us. They're here to do things to us. And I don't appreciate them.

And I have respect the hard work each of you have working with them, but just what would happen if you just said no to the EPA? You don't have to make deals. You don't have to clean up yards that are out of the Box. My goodness, my dog lives in the dirt and I

I902-6

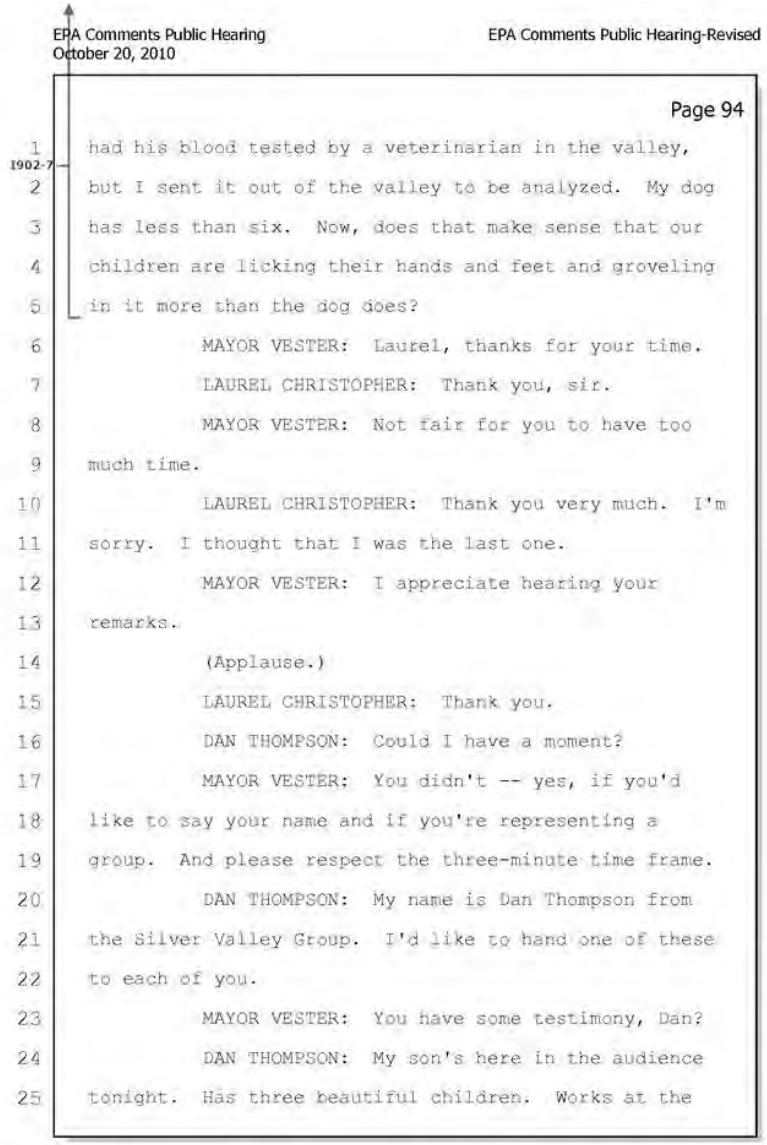
I902-7

Response to comment I902-6

Comment noted.

Response to comment I902-7

Comment noted.



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I902-7

had his blood tested by a veterinarian in the valley, but I sent it out of the valley to be analyzed. My dog has less than six. Now, does that make sense that our children are licking their hands and feet and groveling in it more than the dog does?

MAYOR VESTER: Laurel, thanks for your time.

LAUREL CHRISTOPHER: Thank you, sir.

MAYOR VESTER: Not fair for you to have too much time.

LAUREL CHRISTOPHER: Thank you very much. I'm sorry. I thought that I was the last one.

MAYOR VESTER: I appreciate hearing your remarks.

(Applause.)

LAUREL CHRISTOPHER: Thank you.

DAN THOMPSON: Could I have a moment?

MAYOR VESTER: You didn't -- yes, if you'd like to say your name and if you're representing a group. And please respect the three-minute time frame.

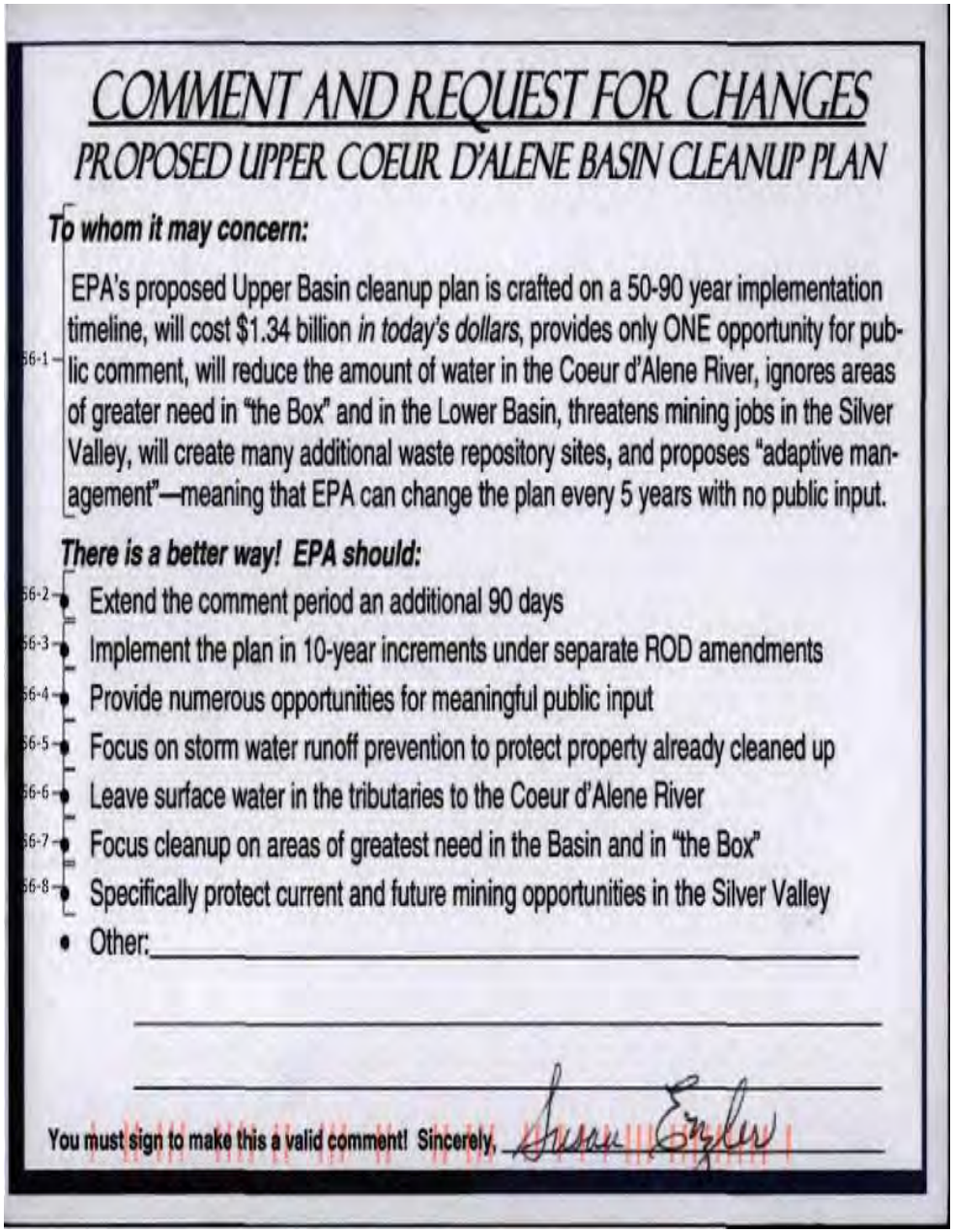
DAN THOMPSON: My name is Dan Thompson from the Silver Valley Group. I'd like to hand one of these to each of you.

MAYOR VESTER: You have some testimony, Dan?

DAN THOMPSON: My son's here in the audience tonight. Has three beautiful children. Works at the

No comments

Enzler, Susan, I156, Letter 1357292



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I56-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I56-2 Extend the comment period an additional 90 days
- I56-3 Implement the plan in 10-year increments under separate ROD amendments
- I56-4 Provide numerous opportunities for meaningful public input
- I56-5 Focus on storm water runoff prevention to protect property already cleaned up
- I56-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I56-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I56-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely, Susan Enzler

Response to comment I156-1
See response to Comment No. I25-1.

Response to comment I156-2
See response to Comment No. I25-2.

Response to comment I156-3
See response to Comment No. I25-3.

Response to comment I156-4
See response to Comment No. I25-4.

Response to comment I156-5
See response to Comment No. I25-5.

Response to comment I156-6
See response to Comment No. I25-6.

Response to comment I156-7
See response to Comment No. I25-7.

Response to comment I156-8
See response to Comment No. I25-8.

Erickson, Carol, I602, Letter 617785

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

ericksoncl2006@ericksonartstudio.com to: formsubmission 11/18/2010 08:46 AM

Sent by: Ericksoncl2006@Ericksonartstudio.Com <ericksoncl2006=ericksonartstudio.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Carol Erickson
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: ericksoncl2006@ericksonartstudio.com
Mailing Address:
Phone Number:

I602-1

617785

Response to comment I602-1

See response to Comment No. I351-1.

Erickson, Lois, I601, Letter 617784

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
erlois@mctvusa.tv to formsubmission 11/19/2010 05:20 PM
Sent by: Erlois@McTvusa.Tv <erlois=mctvusa.tv

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Lois M Erickson
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

This plan is too expensive and too far reaching.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
The Epa has annoyed the Silver Valley far too long already. A 10 year plan should be plenty of time to do the things deemed necessary by the residents of the Valley and the state of Idaho.
Coeur d'Alene Basin Resident: Yes
Email Address: erlois@mctvusa.tv
Mailing Address: 511Boulder Street|Mullan|Idaho|83846|US
Phone Number:

I601-1

I601-2

617784

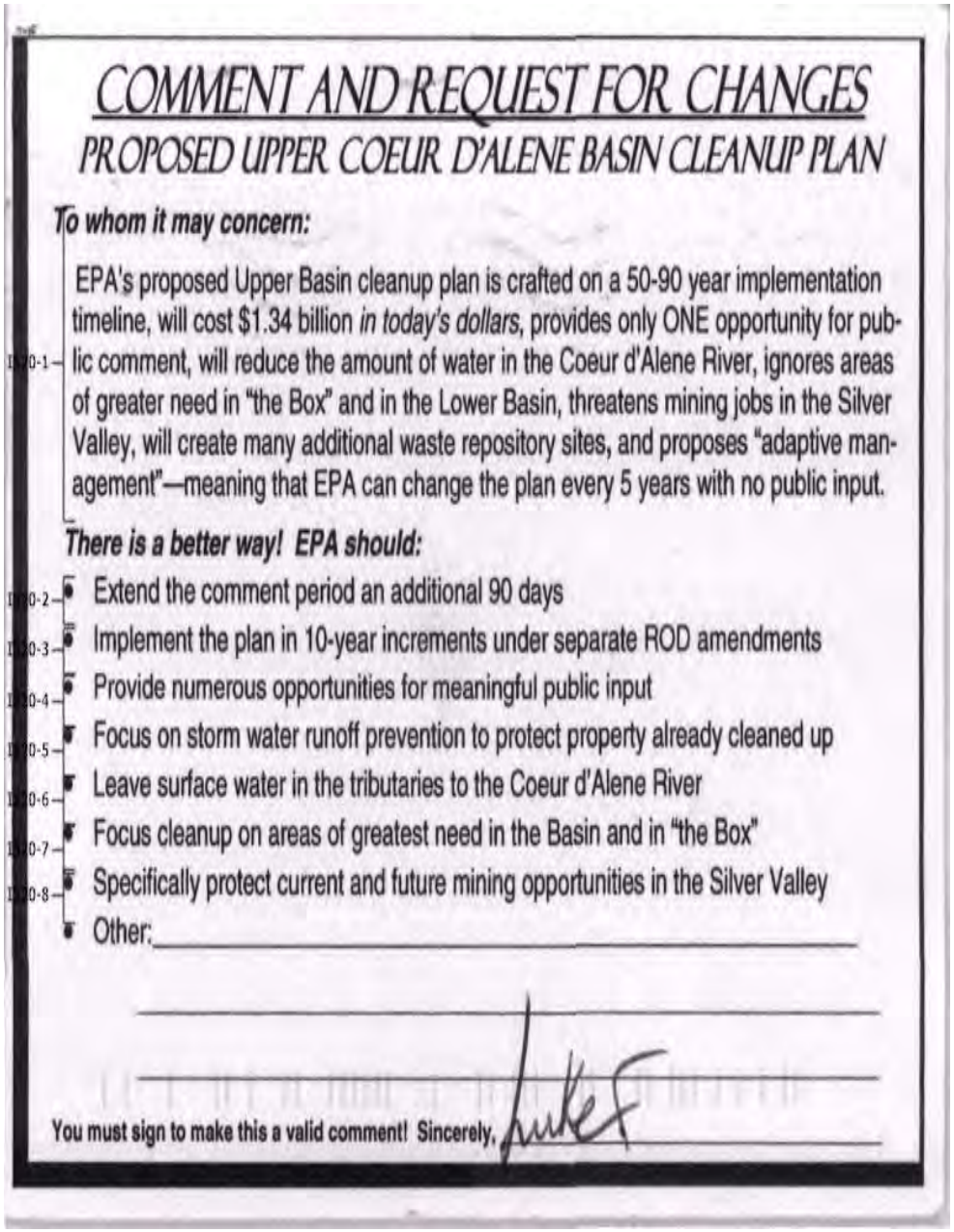
Response to comment I601-1

See response to Comment No. I351-1.

Response to comment I601-2

See responses to Comment Nos. I58-1 and I474-2.

F., Luke, I520, Letter 1357642



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I520-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I520-2 Extend the comment period an additional 90 days
- I520-3 Implement the plan in 10-year increments under separate ROD amendments
- I520-4 Provide numerous opportunities for meaningful public input
- I520-5 Focus on storm water runoff prevention to protect property already cleaned up
- I520-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I520-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I520-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely, Luke F

Response to comment I520-1
See response to Comment No. I25-1.

Response to comment I520-2
See response to Comment No. I25-2.

Response to comment I520-3
See response to Comment No. I25-3.

Response to comment I520-4
See response to Comment No. I25-4.

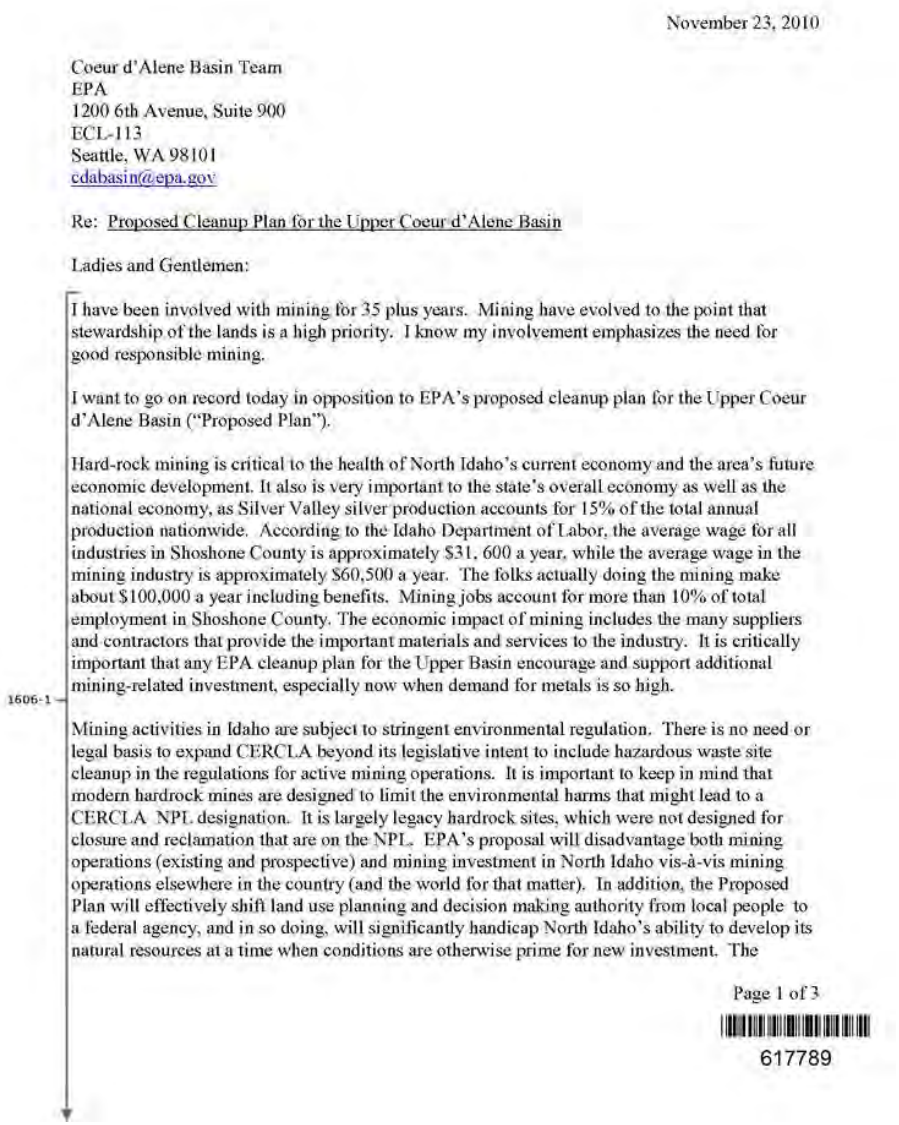
Response to comment I520-5
See response to Comment No. I25-5.

Response to comment I520-6
See response to Comment No. I25-6.

Response to comment I520-7
See response to Comment No. I25-7.

Response to comment I520-8
See response to Comment No. I25-8.

Facer, Dennis, I606, Letter 617789



November 23, 2010

Coeur d'Alene Basin Team
EPA
1200 6th Avenue, Suite 900
ECL-113
Seattle, WA 98101
cdabasin@epa.gov

Re: Proposed Cleanup Plan for the Upper Coeur d'Alene Basin

Ladies and Gentlemen:

I have been involved with mining for 35 plus years. Mining have evolved to the point that stewardship of the lands is a high priority. I know my involvement emphasizes the need for good responsible mining.

I want to go on record today in opposition to EPA's proposed cleanup plan for the Upper Coeur d'Alene Basin ("Proposed Plan").

Hard-rock mining is critical to the health of North Idaho's current economy and the area's future economic development. It also is very important to the state's overall economy as well as the national economy, as Silver Valley silver production accounts for 15% of the total annual production nationwide. According to the Idaho Department of Labor, the average wage for all industries in Shoshone County is approximately $31, 600 a year, while the average wage in the mining industry is approximately $60,500 a year. The folks actually doing the mining make about $100,000 a year including benefits. Mining jobs account for more than 10% of total employment in Shoshone County. The economic impact of mining includes the many suppliers and contractors that provide the important materials and services to the industry. It is critically important that any EPA cleanup plan for the Upper Basin encourage and support additional mining-related investment, especially now when demand for metals is so high.

1606-1

Mining activities in Idaho are subject to stringent environmental regulation. There is no need or legal basis to expand CERCLA beyond its legislative intent to include hazardous waste site cleanup in the regulations for active mining operations. It is important to keep in mind that modern hardrock mines are designed to limit the environmental harms that might lead to a CERCLA NPL designation. It is largely legacy hardrock sites, which were not designed for closure and reclamation that are on the NPL. EPA's proposal will disadvantage both mining operations (existing and prospective) and mining investment in North Idaho vis-à-vis mining operations elsewhere in the country (and the world for that matter). In addition, the Proposed Plan will effectively shift land use planning and decision making authority from local people to a federal agency, and in so doing, will significantly handicap North Idaho's ability to develop its natural resources at a time when conditions are otherwise prime for new investment. The

Page 1 of 3

617789

Response to comment I606-1

This letter is nearly identical to the letter submitted by the Idaho Mining Association. Please see responses to Document LC28 for responses to the Idaho Mining Association's comments.

Proposed Plan also ignores critically important state sovereignty and regulatory imperatives relative to water rights. All of these outcomes are unacceptable and unwarranted.

Starting with the implications for mining, the Proposed Plan will, for the first time, set stringent closure requirements for active tailings ponds that are in compliance with current law and regulatory requirements. This will set an unprecedented and arbitrary double standard for regulation of Silver Valley mining vs. mining elsewhere, to the serious economic disadvantage of the Silver Valley. EPA also says it will only allow new mining activity if it does not "impede" its cleanup plans. This approach is quite clearly intended to make EPA's cleanup plans a higher priority than anyone else's plans, for mining or any other development, effectively putting control of North Idaho's mining economy and economic future in EPA's hands. EPA simply is not justified or authorized to exercise this sort of control.

Similarly, EPA's Proposed Plan implicates and impinges on local land use control authorities. It is a fundamental tenet under our federal system that land use decision making is the right and responsibility of local governments, with some limited role for the State perhaps, but certainly not ever a federal prerogative. The Proposed Plan will undo those rules in the Silver Valley. As noted earlier, it is the Proposed Plan that will control local decision making on economic development. The EPA will need much of the flat ground in the Upper Basin, including existing tailings impoundments, for repository space, leaving little flat ground for any future revenue generating opportunities. EPA also plans to build miles of drains and plumbing along the South Fork and any new development presumably will be precluded unless that development is acceptable to EPA.

1606-1

The Proposed Plan withdraws huge quantities of water in the Upper South Fork of the Coeur d' Alene River and its tributaries above Elizabeth Park for treatment that will have significant impacts on the river and, by extension, on water rights in the Upper South Fork. Those rights are currently in adjudication, pursuant to State law. Is EPA planning to acknowledge State law and participate in that adjudication? EPA's proposed withdrawals would also trigger State permitting requirements, and possibly even require approval by the Idaho Legislature. EPA's proposed withdrawals will also be subject to Idaho's conjunctive management rules and EPA will need to prove these withdrawals will not injure existing water rights. The Proposed Plan is silent on these very important considerations in addressing the feasibility and implementability of EPA's proposal. EPA also ignores the impact its proposal will have on the ability of Upper Basin industrial and municipal water dischargers that have NPDES permits to meet discharge limits on this stretch of river.

EPA's plan is simply too big, too costly and not well thought out. There are also serious questions about whether what EPA proposes is legally permissible or implementable. EPA should instead adopt a realistic and cost-effective 10-year planning approach along the lines of the alternative 10-Year Plan that has been offered in response to EPA's proposal. That plan presents a data-driven, cost-effective approach to remediating high priority historic mining sites with proven technologies that have a high probability of success. At the end of 10 years, cleanup goals and remaining cleanup needs can be evaluated in light of the progress to date. Among other things, the 10-Year Plan respects the limits of federal authority, respects the role and

No comments

importance of mining in the Valley and the rights and freedom of Silver Valley residents to direct their future.

In addition, I have reviewed the comments of the Northwest Mining Association (NWMA) dated November 23, 2010, in particular the comments on the Proposed Plan prepared by ARCADIS U.S., Inc., wherein ARCADIS concludes that the Proposed Plan:

1606-1

- encompasses too large of an area,
- fails to meet ARARs,
- prescribes remedial activities that are not implementable at costs that are proportional to benefits,
- does not demonstrate effectiveness, including protectiveness, over a reasonable amount of time, and
- is not compliant with the NCP in other ways.

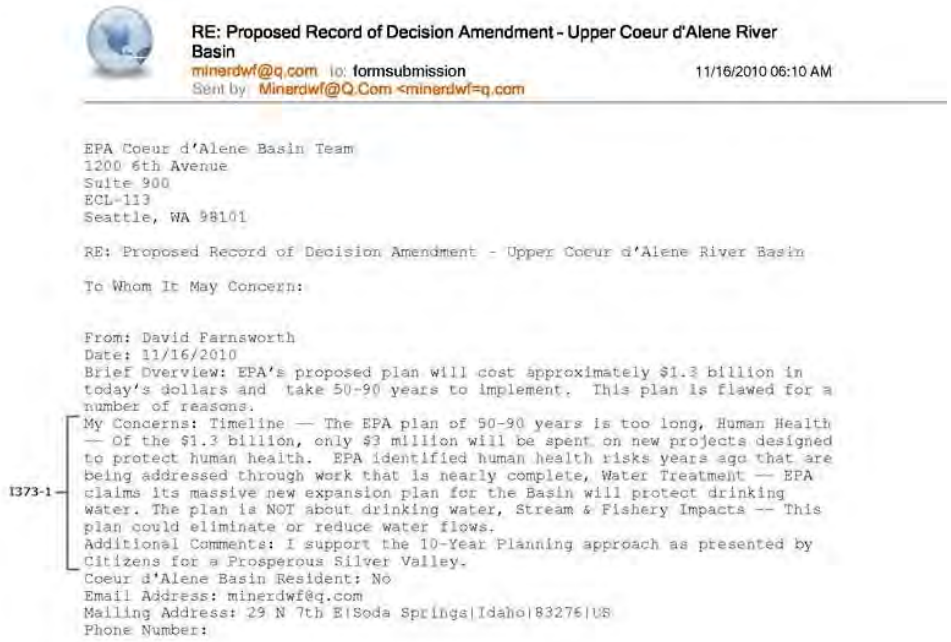
ARCADIS further concludes that the phased 10-year plan is a much more reasoned approach and is both more protective and cost-effective at addressing the critical sources of contamination within a manageable time frame. I fully endorse the ARCADIS comments and incorporate them by reference into this comment letter.

Very truly yours,

Dennis L. Facer
367 Sunny Meadow Court
Afton, Wyoming 83110

No comments

Farnsworth, David, I373, Letter 616261



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
minerdwf@q.com to: formsubmission 11/16/2010 06:10 AM
Sent by: Minerdwf@Q.Com <minerdwf=q.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

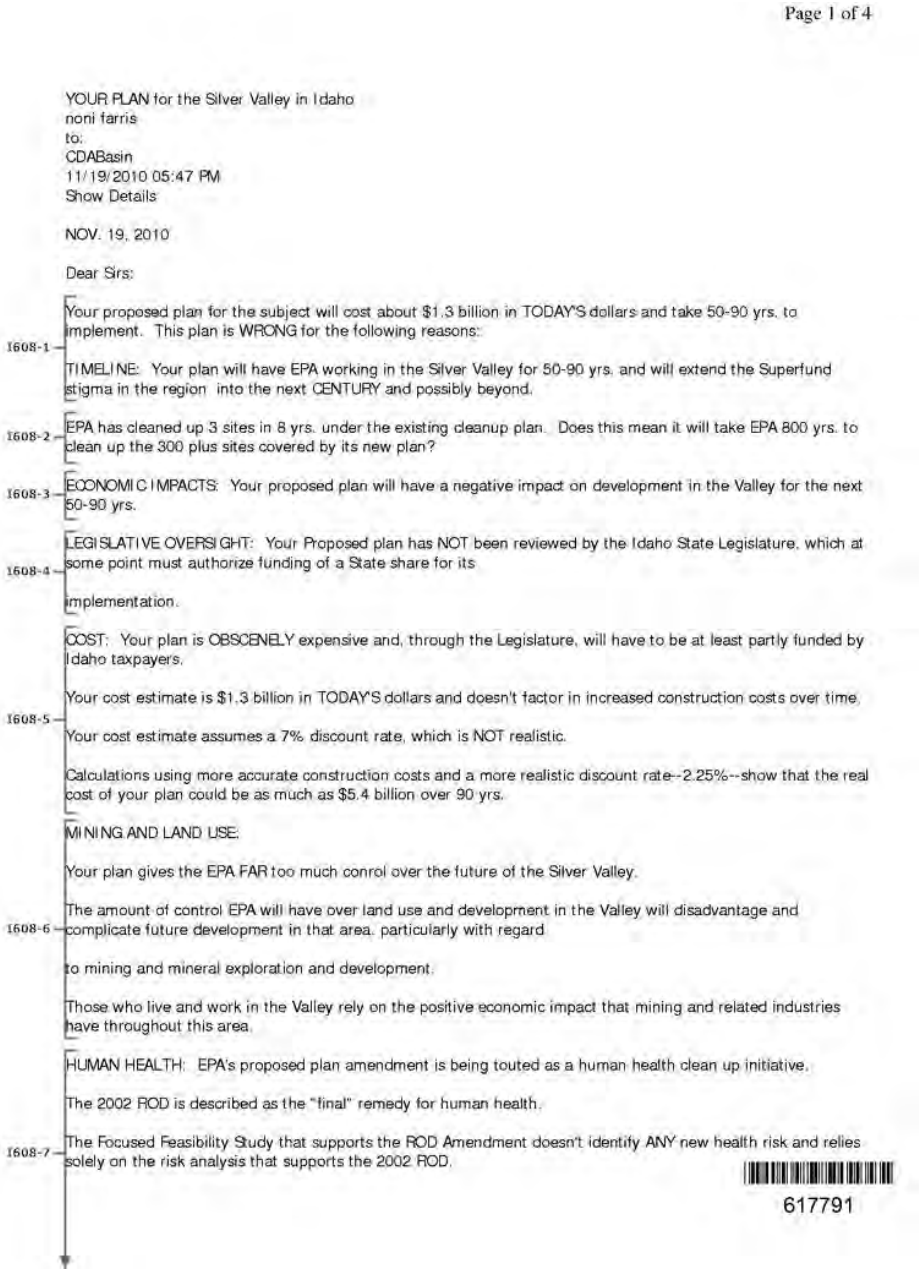
From: David Farnsworth
Date: 11/16/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I373-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows.
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: minerdwf@q.com
Mailing Address: 29 N 7th E|Soda Springs|Idaho|83276|US
Phone Number:

616261

Response to comment I373-1

See response to Comment No. I351-1.

Farris, Noni, I608, Letter 617791



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YOUR PLAN for the Silver Valley in Idaho
noni farris
to:
CDABasin
11/19/2010 05:47 PM
Show Details

NOV. 19, 2010

Dear Sirs:

I608-1 Your proposed plan for the subject will cost about $1.3 billion in TODAY'S dollars and take 50-90 yrs. to implement. This plan is WRONG for the following reasons:

TIMELINE: Your plan will have EPA working in the Silver Valley for 50-90 yrs. and will extend the Superfund stigma in the region into the next CENTURY and possibly beyond.

I608-2 EPA has cleaned up 3 sites in 8 yrs. under the existing cleanup plan. Does this mean it will take EPA 800 yrs. to clean up the 300 plus sites covered by its new plan?

I608-3 ECONOMIC IMPACTS: Your proposed plan will have a negative impact on development in the Valley for the next 50-90 yrs.

I608-4 LEGISLATIVE OVERSIGHT: Your Proposed plan has NOT been reviewed by the Idaho State Legislature, which at some point must authorize funding of a State share for its

implementation.

COST: Your plan is OBSCENELY expensive and, through the Legislature, will have to be at least partly funded by Idaho taxpayers.

I608-5 Your cost estimate is $1.3 billion in TODAY'S dollars and doesn't factor in increased construction costs over time.

Your cost estimate assumes a 7% discount rate, which is NOT realistic.

Calculations using more accurate construction costs and a more realistic discount rate--2.25%--show that the real cost of your plan could be as much as $5.4 billion over 90 yrs.

MINING AND LAND USE:

Your plan gives the EPA FAR too much conrol over the future of the Silver Valley.

I608-6 The amount of control EPA will have over land use and development in the Valley will disadvantage and complicate future development in that area, particularly with regard

to mining and mineral exploration and development.

Those who live and work in the Valley rely on the positive economic impact that mining and related industries have throughout this area.

HUMAN HEALTH: EPA's proposed plan amendment is being touted as a human health clean up initiative.

The 2002 ROD is described as the "final" remedy for human health.

I608-7 The Focused Feasibility Study that supports the ROD Amendment doesn't identify ANY new health risk and relies solely on the risk analysis that supports the 2002 ROD.

617791

Response to comment I608-1

See response to Comment No. I58-1.

Response to comment I608-2

See response to Comment No. I58-1.

Response to comment I608-3

See response to Comment No. I474-1.

Response to comment I608-4

See response to Comment No. LJ39-5.

Response to comment I608-5

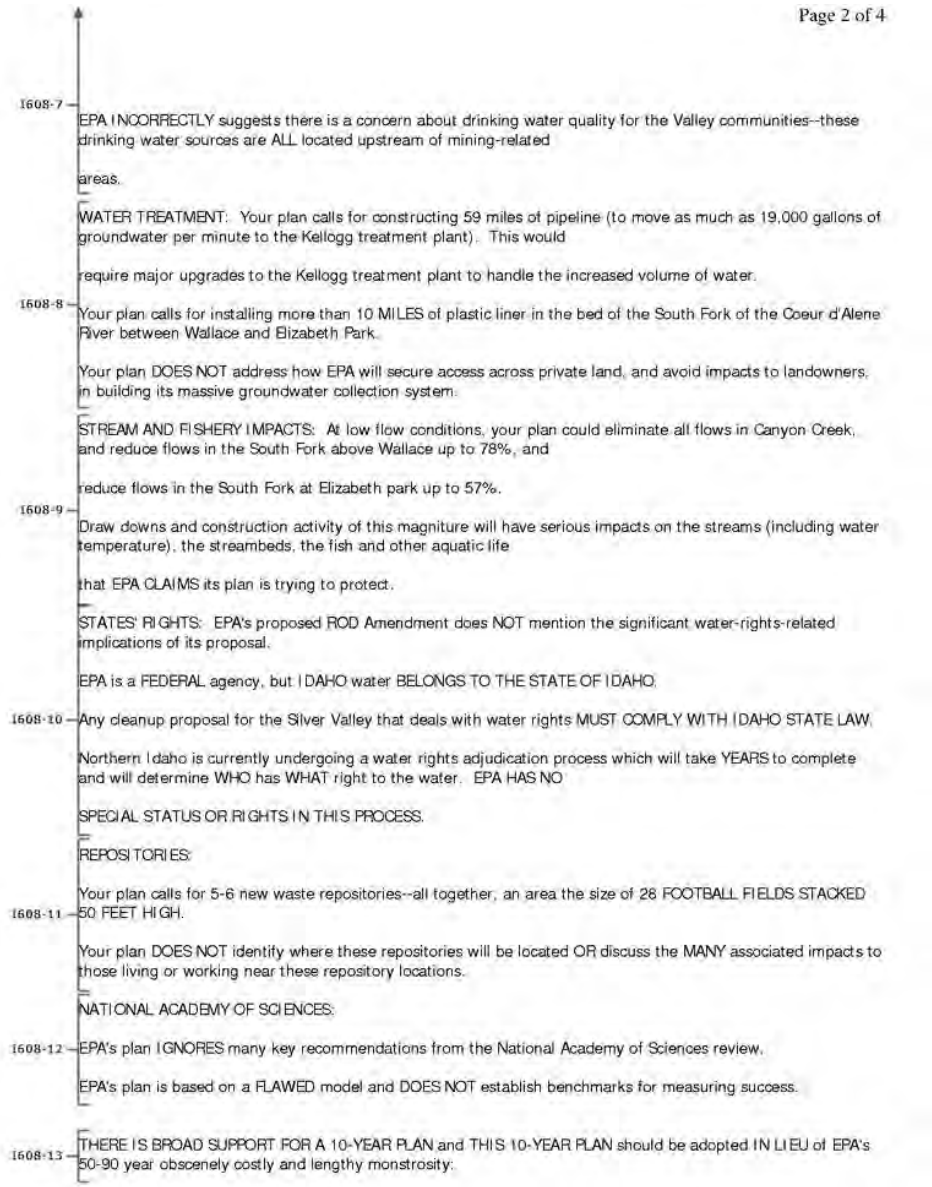
See responses to Comment Nos. I58-2 and I54-12.

Response to comment I608-6

The Selected Remedy does not infringe on local governments' authority to regulate land use. Certain remedial actions, for example mine and mill sites that include consolidation and capping of contaminated materials, may require deed restrictions to ensure the remedy remains protective and that land uses are consistent with the level of cleanup achieved. EPA anticipates that the deed restrictions will be tailored to the area where the remedial action feature is located, i.e. the area where wastes have been consolidated and capped, and filed by the property owner. Previous decision documents have relied on the Institutional Control Program which was implemented through state and local authorities and is administered by the Panhandle Health District. EPA supports the ICP. See responses to Comment Nos. I58-5 and I54-2.

Response to comment I608-7

Regarding human health risks, see response to Comment No. 1295-1. EPA has not focused its Selected Remedy on drinking water. In the case of the SFCDR, the applicable or relevant and appropriate requirements (ARARs) that will protect the environment include site-specific ambient water quality criteria. These criteria were developed by the State of Idaho to protect aquatic life. The water quality standards to protect the environment are more stringent than drinking water standards (i.e., maximum contaminant levels [MCLs]) for contaminants of concern in the Basin. (There is one exception -- mercury, as it has not been found to be prevalent in the Upper Basin.) Therefore, EPA believes that achieving ARARs will inherently have a potential drinking water benefit.



Page 2 of 4

I608-7 EPA INCORRECTLY suggests there is a concern about drinking water quality for the Valley communities--these drinking water sources are ALL located upstream of mining-related areas.

WATER TREATMENT: Your plan calls for constructing 59 miles of pipeline (to move as much as 19,000 gallons of groundwater per minute to the Kellogg treatment plant). This would require major upgrades to the Kellogg treatment plant to handle the increased volume of water.

I608-8 Your plan calls for installing more than 10 MILES of plastic liner in the bed of the South Fork of the Coeur d'Alene River between Wallace and Elizabeth Park.

Your plan DOES NOT address how EPA will secure access across private land, and avoid impacts to landowners, in building its massive groundwater collection system.

STREAM AND FISHERY IMPACTS: At low flow conditions, your plan could eliminate all flows in Canyon Creek, and reduce flows in the South Fork above Wallace up to 78%, and reduce flows in the South Fork at Elizabeth park up to 57%.

I608-9 Draw downs and construction activity of this magniture will have serious impacts on the streams (including water temperature), the streambeds, the fish and other aquatic life that EPA CLAIMS its plan is trying to protect.

STATES' RIGHTS: EPA's proposed ROD Amendment does NOT mention the significant water-rights-related implications of its proposal.

EPA is a FEDERAL agency, but IDAHO water BELONGS TO THE STATE OF IDAHO.

I608-10 Any cleanup proposal for the Silver Valley that deals with water rights MUST COMPLY WITH IDAHO STATE LAW.

Northern Idaho is currently undergoing a water rights adjudication process which will take YEARS to complete and will determine WHO has WHAT right to the water. EPA HAS NO SPECIAL STATUS OR RIGHTS IN THIS PROCESS.

REPOSITORIES:

I608-11 Your plan calls for 5-6 new waste repositories--all together, an area the size of 28 FOOTBALL FIELDS STACKED 50 FEET HIGH.

Your plan DOES NOT identify where these repositories will be located OR discuss the MANY associated impacts to those living or working near these repository locations.

NATIONAL ACADEMY OF SCIENCES:

I608-12 EPA's plan IGNORES many key recommendations from the National Academy of Sciences review.

EPA's plan is based on a FLAWED model and DOES NOT establish benchmarks for measuring success.

I608-13 THERE IS BROAD SUPPORT FOR A 10-YEAR PLAN and THIS 10-YEAR PLAN should be adopted IN LIEU of EPA's 50-90 year obscenely costly and lengthy monstrosity.

Response to comment I608-8

With regard to CTP upgrades see response to Comment No. LC37-9. With regard to the SFCDR groundwater action see response to Comment No. I828-10. With regard to private land access see response to Comment No. I248-1.

Response to comment I608-9

It is unclear where the percentages for stream flow reduction in the comment come from. EPA has evaluated potential stream flow reductions related to the Selected Remedy and they are expected to be minimal. See response to comments I54-8 and LC33-10.

Response to comment I608-10

See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I608-11

See response to Comment No. I58-1 regarding the reduction in scope of the ROD Amendment compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. I54-3 regarding repositories.

Response to comment I608-12

See responses to Comment Nos. LJ27-8 and SA4-13.

Response to comment I608-13

See response to Comment No. I474-2.

Page 3 of 4

1 Adopt the following 10-year cleanup plan--it is SHORTER-TERM, infinitely MORE AFFORDABLE, and has a MUCH GREATER chance of SUCCESS:

2 THE 10-YEAR PLAN:

Would cost only $150-175 MILLION.....Is based on ACTUAL data.....Includes remedy protection in towns and populated areas.....

Includes a $2 million study to support flood control in the Valley.....Allows MANY opportunities for meaningful PUBLIC input.....

Focuses on priority sources of zinc loading above Wallace (Canyon/Nine Mile creeks) and in the "Box" .....WON'T de-water the Coeur d'Alene River.....

1608-14

Establishes achievable goals and benchmarks.....WON'T require MASSIVE treatment plant upgrades.....

Respects existing private property rights, water rights and STATES' rights.....

Protects current & future economic development (including mining & land-use opportunities in the Silver Valley).....

Requires NO additional repositories.....Improves fisheries through site-specific actions and proven technologies.....

Improves water quality standards MORE QUICKLY and AT LESS COST.....IS BEST FOR THE VALLEY, ITS RESIDENTS AND IDAHO.....IS A BETTER WAY!!

NATIONAL ACADEMY OF SCIENCES RECOMMENDATIONS:

EPA should follow the National Academy of Sciences recommendations as follows:

Address the high priority historic mine site areas first, including Canyon and Nine Mile Creeks and the "Box"

1608-15

Be DATA-driven, instead of relying on EPA's Flawed predictive model.

Focus on the achievement of ACTUAL data-driven measures of success, rather than on numerical standards.

Incorporate an adaptive management approach which would address the cleanup in stages, evaluate progress and allow for the revision of goals and strategies based on

effectiveness of actions taken over time.

1608-16 COST: EPA should RECALCULATE THE COST OF THE EXISTING PLAN, allowing for increasing constructions costs, and using a more realistic discount rate of 2.25%.

1608-17 LEGISLATIVE OVERSIGHT: EPA should grant an additional EXTENSION of the COMMENT PERIOD through the 2011 Idaho Legislative session.

1608-18 ENVIRONMENTAL ANALYSIS: EPA should conduct a thorough National Environmental Policy Act-quality analysis of the impacts of its proposal, INCLUDING HOW its proposed

water collection and treatment plans will impact the fishery and aquatic habitat.

1608-19 MINING AND LAND USE: Insist that the plan provide certainty for the mining industry. SPecifically, ask that EPA

Response to comment I608-14

See response to Comment No. I474-2.

Response to comment I608-15

See responses to Comment Nos. LJ27-8 and I58-4.

Response to comment I608-16

See response to Comment No. I54-12.

Response to comment I608-17

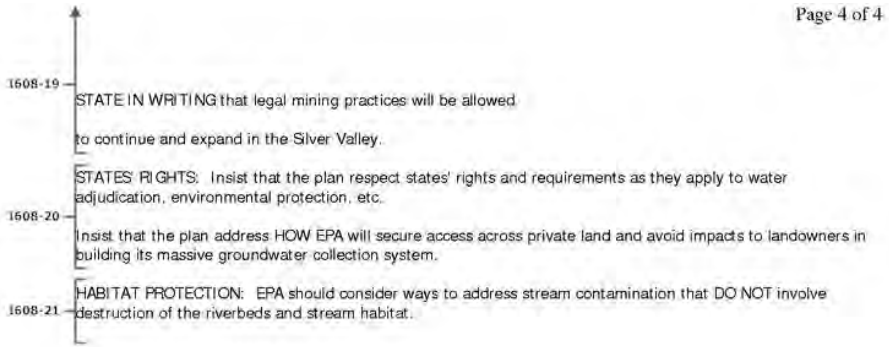
See response to Comment No. I54-6.

Response to comment I608-18

The comment raises issues regarding whether EPA satisfied National Environmental Policy Act (NEPA) requirements. For CERCLA response actions, EPA is exempted from the procedural requirements of environmental laws, including NEPA. CERCLA Section 121 (d)(2)(A) addresses the applicability of other environmental laws through applicable or relevant and appropriate requirements (ARARs). The National Oil and Hazardous Substances Pollution Contingency Plan interprets this to require compliance only with substantive, not procedural, aspects of ARARs. Because NEPA requirements are procedural, NEPA is not an ARAR for CERCLA response actions. EPA procedures or environmental reviews under CERCLA enabling legislation are functionally equivalent to the NEPA process and thus, exempt from the procedural requirements in NEPA. CERCLA addresses the two basic objectives of NEPA: (1) the agency should consider significant environmental impacts of the proposed action, and (2) relevant environmental information should be made available to the public, which allows the public to play a role in the agency's decision-making process and implementation of the decision. The administrative record EPA developed in support of the Selected Remedy documents that EPA, by following the requirements of the NCP, conducted a remedy selection process that was the functional equivalent of NEPA.

Response to comment I608-19

See response to Comment No. I58-5.



Page 4 of 4

1608-19 STATE IN WRITING that legal mining practices will be allowed to continue and expand in the Silver Valley.

STATES' RIGHTS: Insist that the plan respect states' rights and requirements as they apply to water adjudication, environmental protection, etc.

1608-20 Insist that the plan address HOW EPA will secure access across private land and avoid impacts to landowners in building its massive groundwater collection system.

1608-21 HABITAT PROTECTION: EPA should consider ways to address stream contamination that DO NOT involve destruction of the riverbeds and stream habitat.

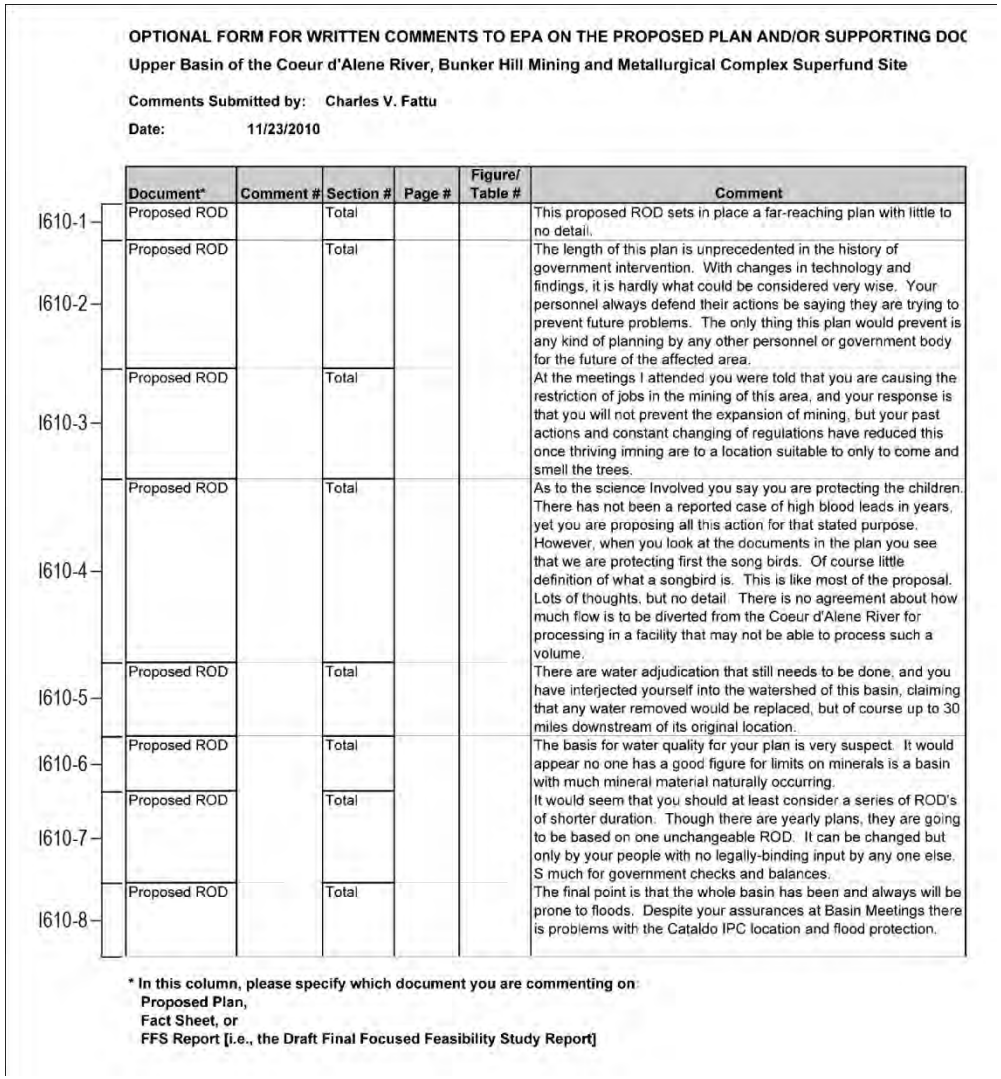
Response to comment I608-20

See responses to Comment Nos. SA4-12, LC33-10, and I248-1 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I608-21

Following consideration of comments received on the Proposed Plan, EPA further evaluated reaches of the SFCDR designated for stream and riparian cleanup actions that were of the most concern to stakeholders. As a result of this evaluation EPA has made changes to its plans for stream and riparian actions. These changes are described in the ROD Amendment, Part 2, Section 14.3.

Fattu, Charles, I610, Letter 617793



OPTIONAL FORM FOR WRITTEN COMMENTS TO EPA ON THE PROPOSED PLAN AND/OR SUPPORTING DOC

Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site

Comments Submitted by: Charles V. Fattu

Date: 11/23/2010

	Document*	Comment #	Section #	Page #	Figure/ Table #	Comment
I610-1	Proposed ROD		Total			This proposed ROD sets in place a far-reaching plan with little to no detail.
I610-2	Proposed ROD		Total			The length of this plan is unprecedented in the history of government intervention. With changes in technology and findings, it is hardly what could be considered very wise. Your personnel always defend their actions be saying they are trying to prevent future problems. The only thing this plan would prevent is any kind of planning by any other personnel or government body for the future of the affected area.
I610-3	Proposed ROD		Total			At the meetings I attended you were told that you are causing the restriction of jobs in the mining of this area, and your response is that you will not prevent the expansion of mining, but your past actions and constant changing of regulations have reduced this once thriving imning are to a location suitable to only to come and smell the trees.
I610-4	Proposed ROD		Total			As to the science Involved you say you are protecting the children. There has not been a reported case of high blood leads in years, yet you are proposing all this action for that stated purpose. However, when you look at the documents in the plan you see that we are protecting first the song birds. Of course little definition of what a songbird is. This is like most of the proposal. Lots of thoughts, but no detail. There is no agreement about how much flow is to be diverted from the Coeur d'Alene River for processing in a facility that may not be able to process such a volume.
I610-5	Proposed ROD		Total			There are water adjudication that still needs to be done, and you have interjected yourself into the watershed of this basin, claiming that any water removed would be replaced, but of course up to 30 miles downstream of its original location.
I610-6	Proposed ROD		Total			The basis for water quality for your plan is very suspect. It would appear no one has a good figure for limits on minerals is a basin with much mineral material naturally occurring.
I610-7	Proposed ROD		Total			It would seem that you should at least consider a series of ROD's of shorter duration. Though there are yearly plans, they are going to be based on one unchangeable ROD. It can be changed but only by your people with no legally-binding input by any one else. S much for government checks and balances.
I610-8	Proposed ROD		Total			The final point is that the whole basin has been and always will be prone to floods. Despite your assurances at Basin Meetings there is problems with the Cataldo IPC location and flood protection.

*** In this column, please specify which document you are commenting on:**
Proposed Plan,
Fact Sheet, or
FFS Report [i.e., the Draft Final Focused Feasibility Study Report]

Response to Comment I610-1

See response to Comment No. I58-1.

Response to Comment I610-2

See response to Comment No. I58-1.

Response to Comment I610-3

See response to Comment No. I58-5.

Response to Comment I610-4

Regarding human health risks in the Upper Basin, see response to Comment No. I295-1.

As discussed in the ROD Amendment, for additional information regarding risks to songbirds, see the following references: CH2M HILL, December 2006 (Coeur d'Alene Riparian Songbird Ecological Risk Assessment); Hansen, James A., August 30, 2007 (Songbird Exposure to Lead-Contaminated Soils in the Coeur d'Alene Basin); Hansen, James A., Daniel Audet, Brian L. Spears, Kate A. Healy, Roy E. Brazzle, David J. Hoffman, Anne Dailey, and W. Nelson Beyer, April 2011 ("Lead Exposure and Poisoning of Songbirds Using the Coeur d'Alene River Basin, Idaho, USA" in Integrated Environmental Assessment and Management, vol. 7. No. 4, pp. 587-595); and Sample, Bradley E., James A. Hansen, Anne Dailey, and Bruce Duncan, July 2011 ("Assessment of Risks to Ground-Feeding Songbirds from Lead in the Coeur d'Alene Basin, Idaho, USA" in Integrated Environmental Assessment and Management, vol. 7, no. 4, pp. 596-611).

Regarding the collection of contaminated groundwater for treatment (and associated reductions in stream flows), see response to Comment No. I54-8. Upgrade and expansion of the Central Treatment Plant (CTP) in Kellogg is a component of the Selected Remedy; therefore, the facility will have the ability to treat the waters identified for treatment.

Response to Comment I610-5

See response to Comment No. SA4-12.

Response to Comment I610-6

See response to Comment No. LC33-8.

Response to Comment I610-7

See response to Comment No. LJ11-2.

Response to Comment I610-8

Regarding general flooding concerns, see response to Comment No. LJ36-3. Regarding the East Mission Flats Repository, see response to Comment No. LC21-9.

Fedders, John, I611, Letter 617794

Silver Valley of North Idaho
John Fedders
to:
CDABasin
11/17/2010 07:58 AM
Sent by:
jfedders@gmail.com
Show Details

Ladies and Gentleman:

I611-1 I am a property owner in Tetonia, Idaho and an attorney admitted to the bar in Idaho. I also practice law in Washington, D.C.

I write to you with respect to your proposal to work in the Silver Valley of North Idaho for the next several decades.

The EPA's proposal appears to me, after care study, to be a serious and arbitrary waste of U.S. taxpayers' money. The project will cost billions of dollars. As everyone at the EPA knows, there are reasonable alternative approaches, namely, a less expensive plan taking only a decade.

I611-2 My understanding is that under CERCLA, Idaho and its citizens will be required to pay 10% of construction costs and all operating and maintenance charges. There is no need for this to occur. As an Idaho property owner, I reject the bogus science upon which the Silver Valley project is based. There is no need to usurp Idaho land use and water rights.

I611-3 I oppose in the strongest terms the wasteful, expensive and unecessary project. We will do what is necessary to stop the power grab by an administrative agency, the EPA.

Respectfully submitted, John Fedders

John M. Fedders
Attorney at Law
1914 Sunderland Place, N.W.
Washington, D.C. 20036-1608
Tel: (202) 659-2424
Fax: (202) 659-4959
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E-mail: jfedders@fedderslaw.com
Website: www.fedderslaw.com

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Any advice contained in this communication is not intended or written by the author to be used, and nothing contained in this communication can be used by you or any other person, for purposes of avoiding penalties that may be imposed under Federal tax law.

617794

Response to comment I611-1

See responses to Comment Nos. I58-2 and I474-2.

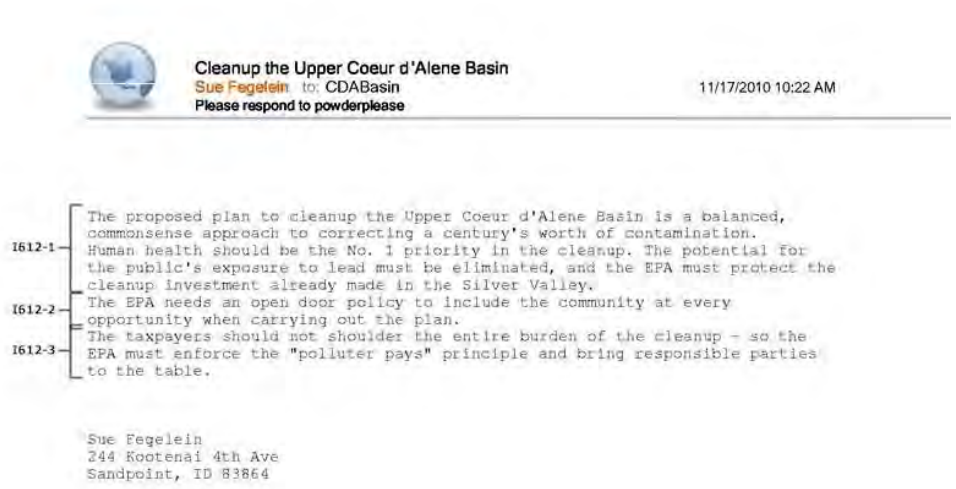
Response to comment I611-2

The State of Idaho is not required to provide funds for remedial actions funded by monies EPA recovers from settlements. Settlement funds can be used to reduce both federal and state costs associated with cleanup. EPA, and the ASARCO Work Trust, have received approximately $691 million from its settlements with ASARCO Inc. and the Hecla Mining Company, and is committed to careful use of these funds to protect human health and the environment over the long-term. However, when cleanup costs exceed the money recovered, the federal government pays directly for cleanup, and the state is required to fund 10 percent of the construction costs and 100 percent of the O&M costs. In regards to water rights please see response to comment SA4-12.

Response to comment I611-3

Comment noted. See response to Comment I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan.

Fegelein, Sue, I612, Letter 617795



Cleanup the Upper Coeur d'Alene Basin
Sue Fegelein to: CDABasin 11/17/2010 10:22 AM
Please respond to powderplease

I612-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I612-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I612-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Sue Fegelein
244 Kootenai 4th Ave
Sandpoint, ID 83864

617795

Response to comment I612-1

See response to Comment No. I295-1.

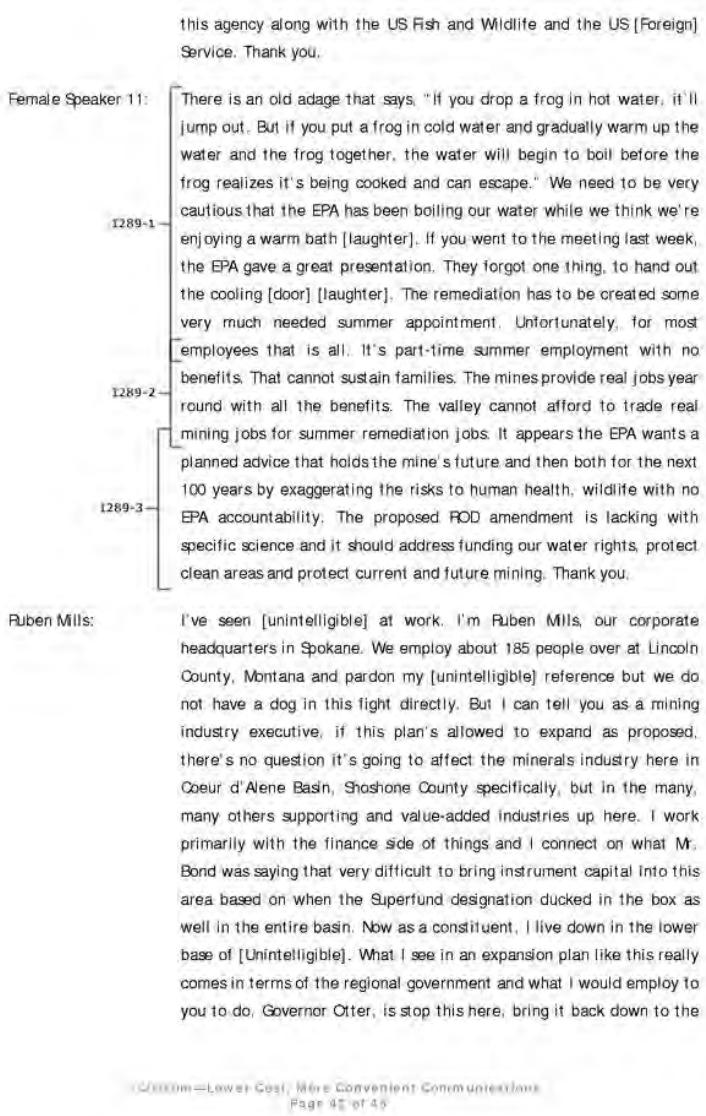
Response to comment I612-2

See response to Comment No. I295-2.

Response to comment I612-3

See response to Comment No. I295-3.

Female Speaker 11, I289, Letter 616015-54



this agency along with the US Fish and Wildlife and the US [Foreign] Service. Thank you.

Female Speaker 11: There is an old adage that says, "If you drop a frog in hot water, it'll jump out. But if you put a frog in cold water and gradually warm up the water and the frog together, the water will begin to boil before the frog realizes it's being cooked and can escape." We need to be very cautious that the EPA has been boiling our water while we think we're enjoying a warm bath [laughter]. If you went to the meeting last week, the EPA gave a great presentation. They forgot one thing, to hand out the cooling [door] [laughter]. The remediation has to be created some very much needed summer appointment. Unfortunately, for most employees that is all. It's part-time summer employment with no benefits. That cannot sustain families. The mines provide real jobs year round with all the benefits. The valley cannot afford to trade real mining jobs for summer remediation jobs. It appears the EPA wants a planned advice that holds the mine's future and then both for the next 100 years by exaggerating the risks to human health, wildlife with no EPA accountability. The proposed ROD amendment is lacking with specific science and it should address funding our water rights, protect clean areas and protect current and future mining. Thank you.

I289-1

I289-2

I289-3

Ruben Mills: I've seen [unintelligible] at work. I'm Ruben Mills, our corporate headquarters in Spokane. We employ about 185 people over at Lincoln County, Montana and pardon my [unintelligible] reference but we do not have a dog in this fight directly. But I can tell you as a mining industry executive, if this plan's allowed to expand as proposed, there's no question it's going to affect the minerals industry here in Coeur d'Alene Basin, Shoshone County specifically, but in the many, many others supporting and value-added industries up here. I work primarily with the finance side of things and I connect on what Mr. Bond was saying that very difficult to bring instrument capital into this area based on when the Superfund designation ducked in the box as well in the entire basin. Now as a constituent, I live down in the lower base of [Unintelligible]. What I see in an expansion plan like this really comes in terms of the regional government and what I would employ to you to do, Governor Otter, is stop this here, bring it back down to the

Response to comment I289-1

Comment noted.

Response to comment I289-2

See response to Comment No. I58-5.

Response to comment I289-3

See response to Comment No. I58-5 regarding CERCLA cleanup actions and mining. See response to Comment No. I58-1 regarding the reduced scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. SA4-12 regarding water rights.

Fessler, Gary, I613, Letter 617796

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
gjfessler@yahoo.com to: formsubmission 11/16/2010 04:42 PM
Sent by: Gjfessler@Yahoo.Com <gjfessler=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Gary Fessler
Date: 11/16/2010
Brief Overview: My primary concerns are that: 1) Estimated costs are in today's dollars and the actual cost will be well over the advertised $1.3billion. 2) I also don't trust that the EPA has reasonably and economically considered all alternatives.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high
Additional Comments: I am in agreement with what the EPA has done within the current BOX (Bunker Hill Site). Please spend the funds to permanently secure THIS site.

But regarding the "outside the box" proposal:

I'm being told that the EPA's $1.3 billion estimate is way off - in that they are using TODAY's dollars. If this is true, it shows me complete mismanagement of the project - what public firm can go to its shareholders with this kind of proposal and knowing in the end that it will report 2x, 3x times greater than this in actual costs. The board of directors would be sued and replaced!

There are items that I've come to the conclusion are political and self-serving but NOT scientific (in other words I don't trust what I'm reading at times from the EPA):
What I'm hearing is that most of the money and time being proposed under this new plan is actually for FISH HABITAT not human safety. In other words the removal of zinc from the waterways. What I think I'm reading is SCARE tactics from the EPA on human health conditions.
Why are you spending money EAST of Wallace - as far as I can see this shows NO zinc concerns. My conversations with area locals say that public water comes from beyond impacted sites. And there is fewer dollars allocated where there

617796

I613-1
I613-2
I613-3
I613-4
I613-5
I613-6

Response to comment I613-1
See response to Comment No. I351-1.

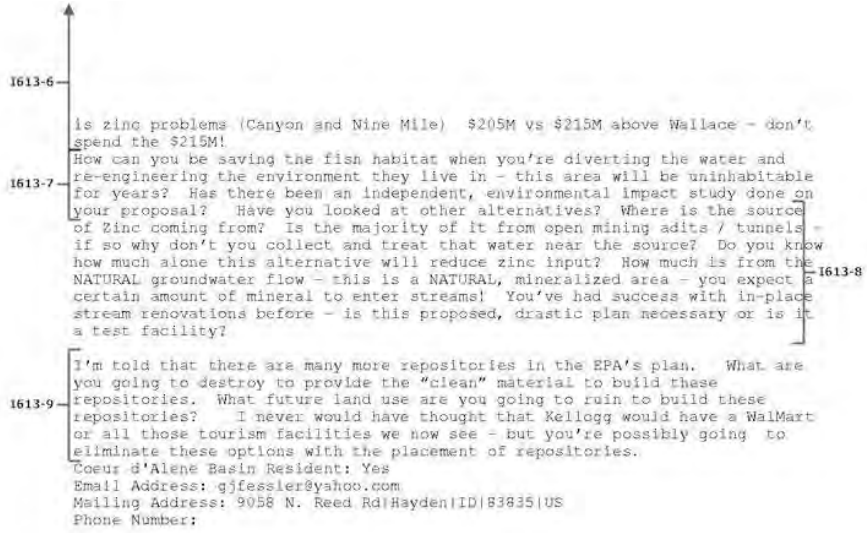
Response to comment I613-2
See response to Comment No. I54-3.

Response to comment I613-3
Comment Noted

Response to comment I613-4
See responses to Comment Nos. I58-1 and I54-12.

Response to comment I613-5
There are serious risks to human health from heavy metal contamination in the Basin. The risks are well documented. EPA has a regulatory responsibility to address these risks. Lead is of most concern, especially for young children and pregnant women. Though some cleanup has been done, there is more work to do to protect people. Cleaning up contamination in the Upper Basin will reduce the amount of metals that flows downstream into communities. Also, some of the work done under this ROD Amendment will help keep cleaned-up areas clean. It will address tributary flooding, which can spread contamination. Also see the ROD Amendment, Part 3, Section 3.2.4.

Response to comment I613-6
See response to Comment No. I822-14. EPA has reduced the scope of the Selected Remedy. The Selected Remedy includes significantly less remedial actions east of Wallace compared to the Preferred Alternative identified in the Proposed Plan.



I613-6

is zinc problems (Canyon and Nine Mile) $205M vs $215M above Wallace - don't spend the $215M!

I613-7

How can you be saving the fish habitat when you're diverting the water and re-engineering the environment they live in - this area will be uninhabitable for years? Has there been an independent, environmental impact study done on your proposal? Have you looked at other alternatives? Where is the source of Zinc coming from? Is the majority of it from open mining adits / tunnels - if so why don't you collect and treat that water near the source? Do you know how much alone this alternative will reduce zinc input? How much is from the NATURAL groundwater flow - this is a NATURAL, mineralized area - you expect a certain amount of mineral to enter streams! You've had success with in-place stream renovations before - is this proposed, drastic plan necessary or is it a test facility?

I613-8

I613-9

I'm told that there are many more repositories in the EPA's plan. What are you going to destroy to provide the "clean" material to build these repositories. What future land use are you going to ruin to build these repositories? I never would have thought that Kellogg would have a WalMart or all those tourism facilities we now see - but you're possibly going to eliminate these options with the placement of repositories.

Coeur d'Alene Basin Resident: Yes
Email Address: gjfessler@yahoo.com
Mailing Address: 9058 N. Reed Rd|Hayden|ID|83835|US
Phone Number:

Response to comment I613-7

See response to Comment No. I54-8.

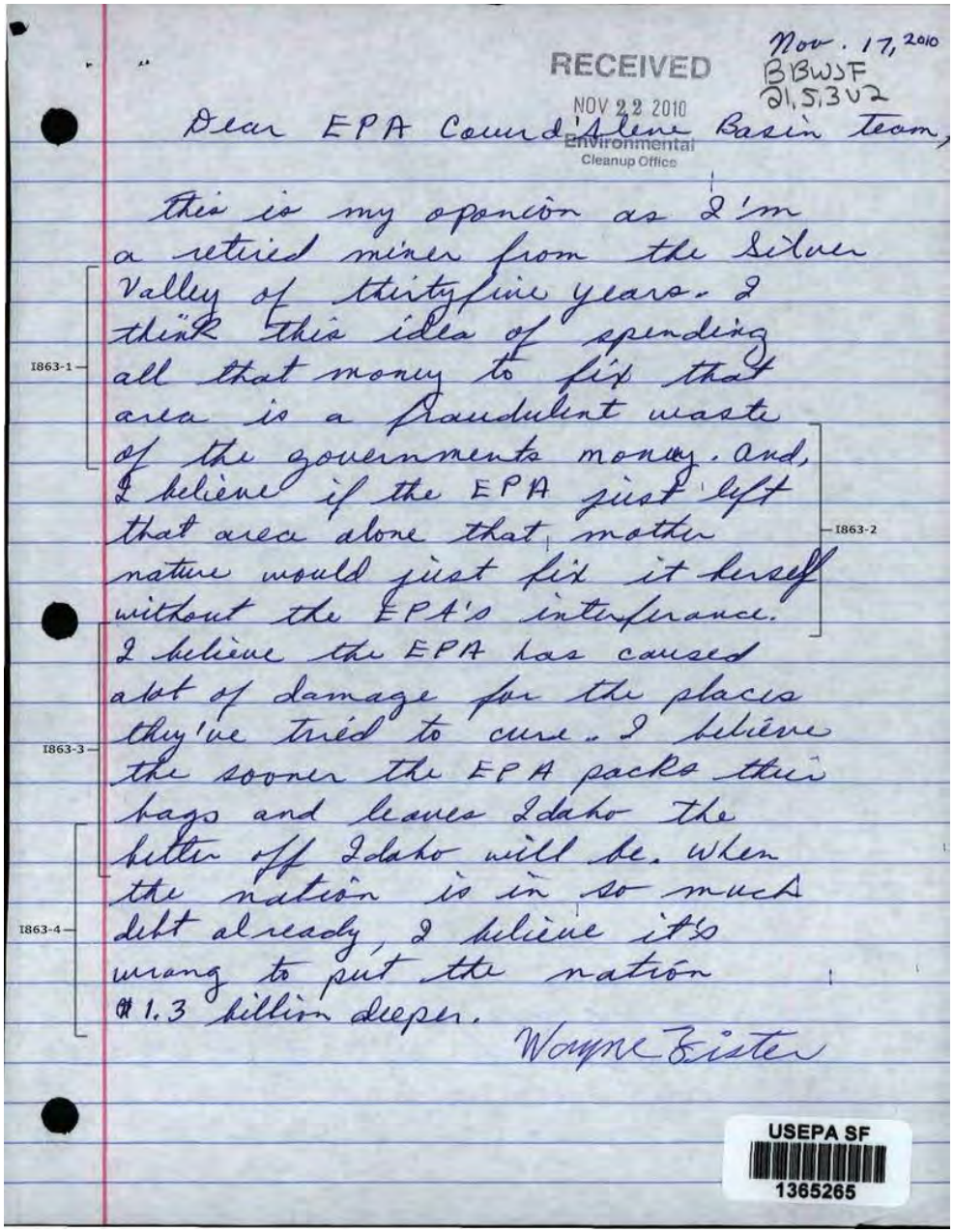
Response to comment I613-8

EPA developed and evaluated alternatives according to CERCLA criteria and the National Oil and Hazardous Substances Pollution Contingency Plan in the Focused Feasibility Study (FFS) Report (EPA, August 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). The long- and short-term effectiveness of each alternative was evaluated in the FFS Report. The sources of metals loading in the Upper Basin are described in Section 5.0 of the Upper Basin ROD Amendment. See response to Comment No. LC33-8 regarding background levels in the Coeur d'Alene Basin.

Response to comment I613-9

See response to Comment No. I54-3.

Fister, Wayne, I863, Letter 1365265



RECEIVED
NOV 22 2010
Environmental
Cleanup Office

Nov. 17, 2010
BBWJF
21,5,3U2

Dear EPA Coeur d'Alene Basin team,

this is my opencion as I'm a retired miner from the Silver Valley of thirtyfive years. I think this idea of spending all that money to fix that area is a fraudulent waste of the gouernments money. And, I beliene if the EPA just left that area alone that mother nature would just fix it herself without the EPA's interferance. I beliene the EPA has caused alot of damage for the places they've tried to cure. I beliene the sooner the EPA packs their bags and leaues Idaho the better off Idaho will be. When the nation is in so much debt already, I beliene it's wrang to put the nation @ 1.3 billion deeper.

Wayne Fister

I863-1
I863-2
I863-3
I863-4

USEPA SF
1365265

Response to comment I863-1

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. See response to Comment No. I58-2.

Response to comment I863-2

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

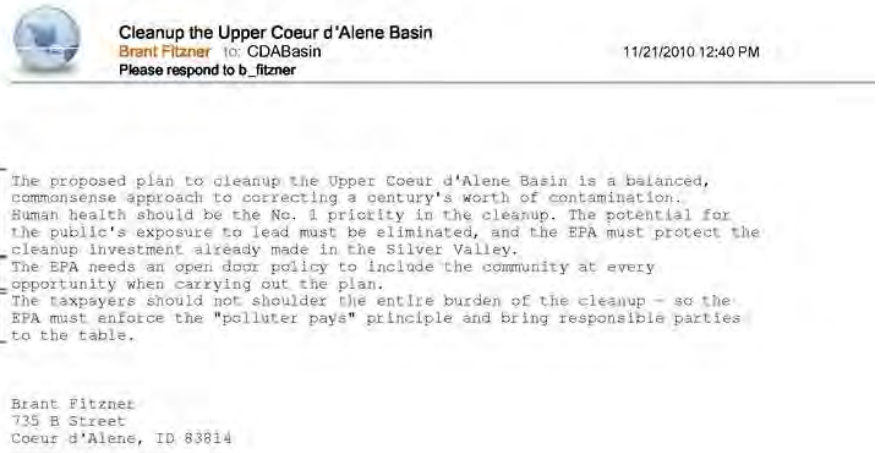
Response to comment I863-3

Comment noted.

Response to comment I863-4

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. See response to Comment No. I58-2.

Fitzner, Brant, I615, Letter 617798



Cleanup the Upper Coeur d'Alene Basin
Brant Fitzner to: CDABasin 11/21/2010 12:40 PM
Please respond to b_fitzner

I615-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I615-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I615-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Brant Fitzner
735 B Street
Coeur d'Alene, ID 83814

617798

Response to comment I615-1

See response to Comment No. I295-1.

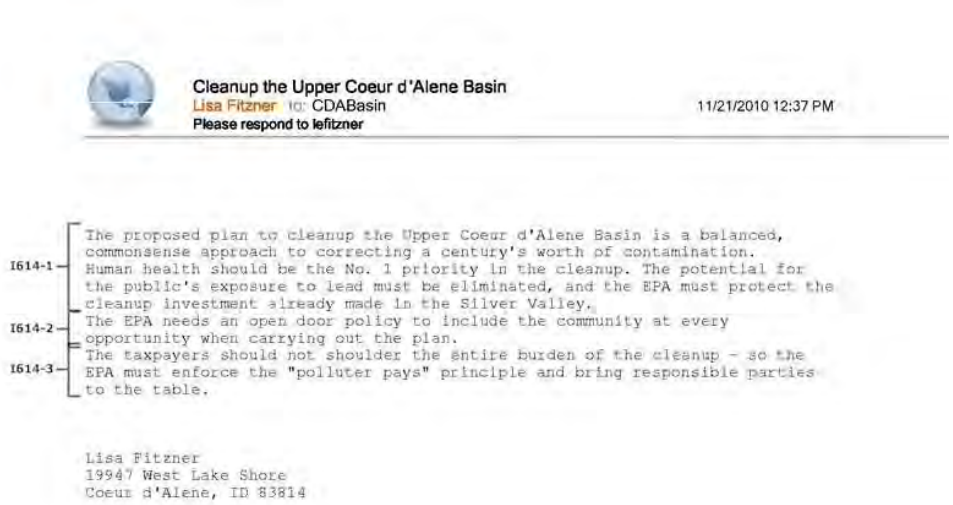
Response to comment I615-2

See response to Comment No. I295-2.

Response to comment I615-3

See response to Comment No. I295-3.

Fitzner, Lisa, I614, Letter 617797



Cleanup the Upper Coeur d'Alene Basin
Lisa Fitzner to: CDABasin 11/21/2010 12:37 PM
Please respond to lefitzner

I614-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I614-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I614-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Lisa Fitzner
19947 West Lake Shore
Coeur d'Alene, ID 83814

617797

Response to comment I614-1

See response to Comment No. I295-1.

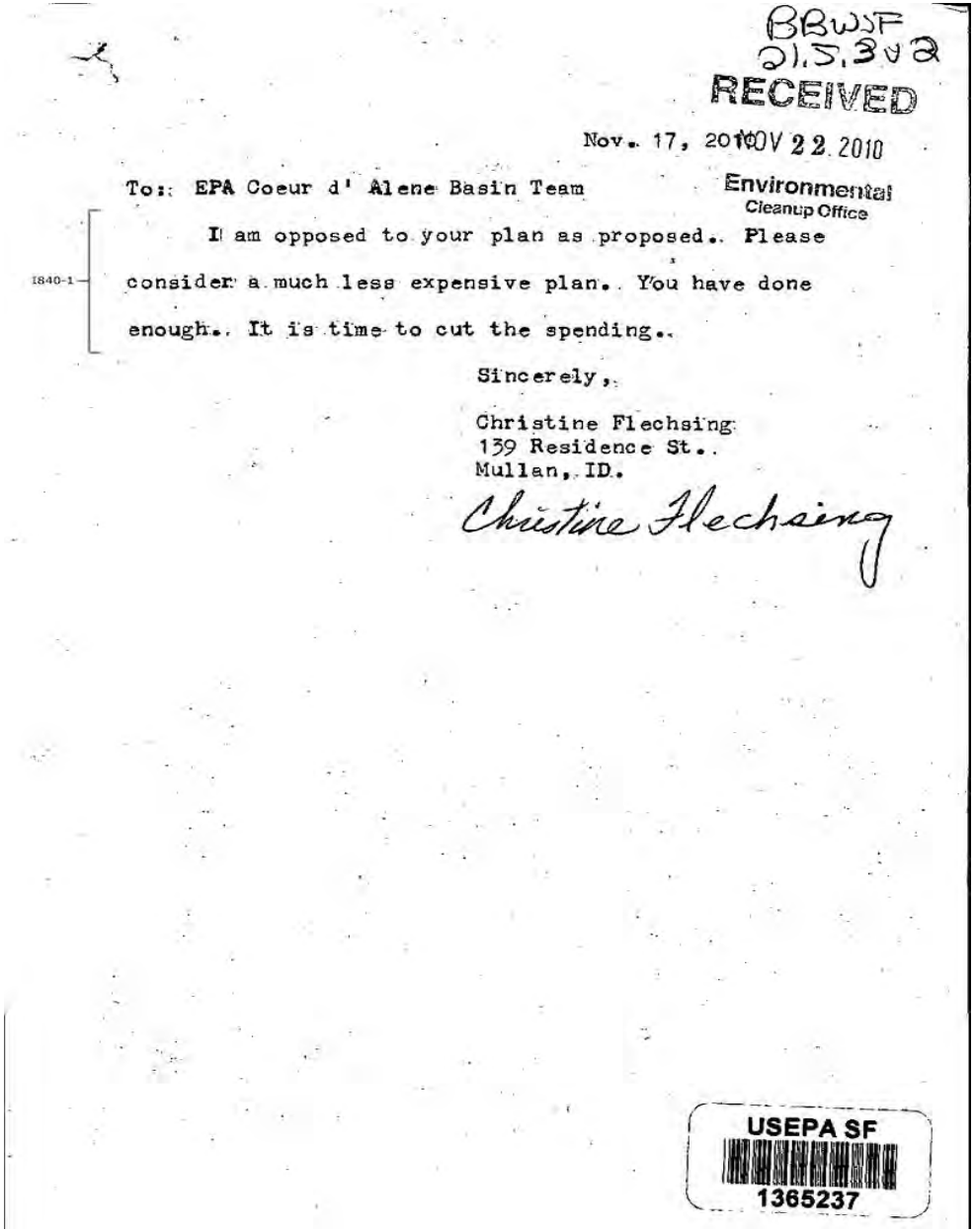
Response to comment I614-2

See response to Comment No. I295-2.

Response to comment I614-3

See response to Comment No. I295-3.

Flechsing, Christine, I840, Letter 1365237



BBWJF
21.5.3v2

RECEIVED
NOV 22 2010
Environmental
Cleanup Office

Nov. 17, 2010

To:: EPA Coeur d' Alene Basin Team

I840-1 I am opposed to your plan as proposed.. Please consider a much less expensive plan.. You have done enough.. It is time to cut the spending..

Sincerely,

Christine Flechsing
139 Residence St..
Mullan,. ID.

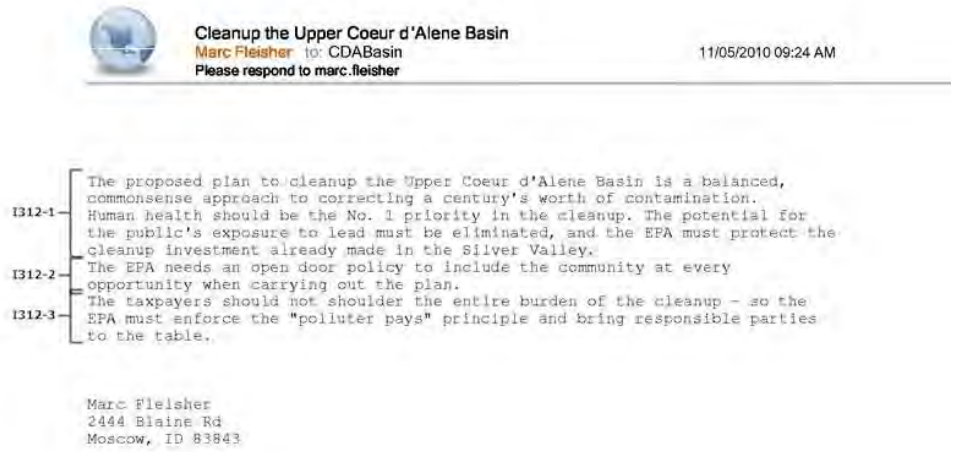
Christine Flechsing

USEPA SF
1365237

Response to comment I840-1

See responses to Comment Nos. I58-1 and I58-2.

Fleisher, Mark, I312, Letter 614442



Cleanup the Upper Coeur d'Alene Basin
Marc Fleisher to: CDABasin 11/05/2010 09:24 AM
Please respond to marc.fleisher

I312-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I312-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I312-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Marc Fleisher
2444 Blaine Rd
Moscow, ID 83843

614442

Response to comment I312-1

See response to Comment No. I295-1.

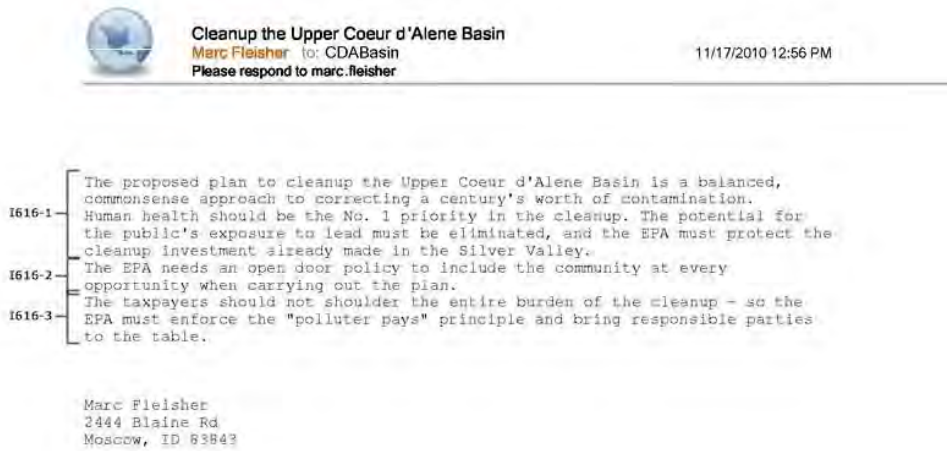
Response to comment I312-2

See response to Comment No. I295-2.

Response to comment I312-3

See response to Comment No. I295-3.

Fleisher, Mark, I616, Letter 617799



Cleanup the Upper Coeur d'Alene Basin
Marc Fleisher to: CDABasin 11/17/2010 12:56 PM
Please respond to marc.fleisher

I616-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I616-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I616-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Marc Fleisher
2444 Blaine Rd
Moscow, ID 83843

617799

Response to comment I616-1

See response to Comment No. I295-1.

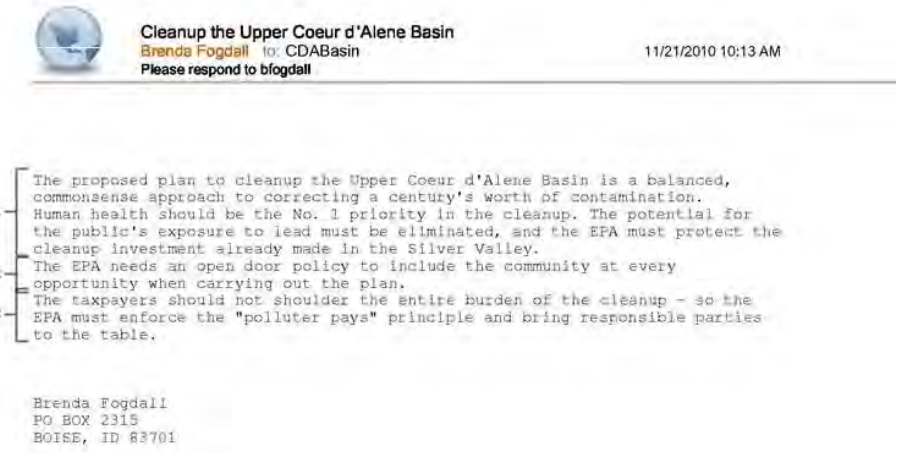
Response to comment I616-2

See response to Comment No. I295-2.

Response to comment I616-3

See response to Comment No. I295-3.

Fogdall, Brenda, I617, Letter 617800



Cleanup the Upper Coeur d'Alene Basin
Brenda Fogdall to: CDABasin 11/21/2010 10:13 AM
Please respond to bfogdall

I617-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I617-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I617-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Brenda Fogdall
PO BOX 2315
BOISE, ID 83701

617800

Response to comment I617-1

See response to Comment No. I295-1.

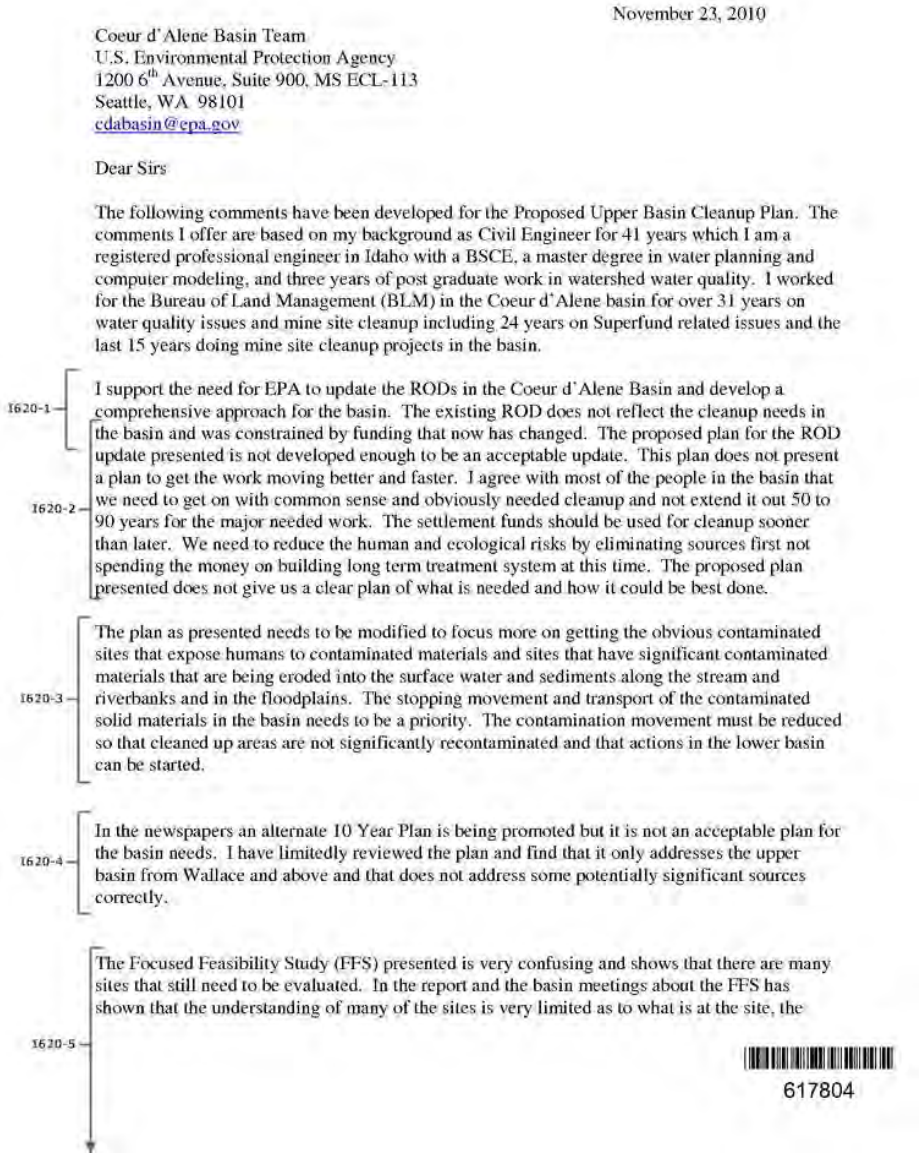
Response to comment I617-2

See response to Comment No. I295-2.

Response to comment I617-3

See response to Comment No. I295-3.

Fortier, David, I620, Letter 617804



November 23, 2010

Coeur d'Alene Basin Team
U.S. Environmental Protection Agency
1200 6th Avenue, Suite 900, MS ECL-113
Seattle, WA 98101
cdabasin@epa.gov

Dear Sirs

The following comments have been developed for the Proposed Upper Basin Cleanup Plan. The comments I offer are based on my background as Civil Engineer for 41 years which I am a registered professional engineer in Idaho with a BSCE, a master degree in water planning and computer modeling, and three years of post graduate work in watershed water quality. I worked for the Bureau of Land Management (BLM) in the Coeur d'Alene basin for over 31 years on water quality issues and mine site cleanup including 24 years on Superfund related issues and the last 15 years doing mine site cleanup projects in the basin.

I620-1 I support the need for EPA to update the RODs in the Coeur d'Alene Basin and develop a comprehensive approach for the basin. The existing ROD does not reflect the cleanup needs in the basin and was constrained by funding that now has changed. The proposed plan for the ROD update presented is not developed enough to be an acceptable update. This plan does not present a plan to get the work moving better and faster. I agree with most of the people in the basin that

I620-2 we need to get on with common sense and obviously needed cleanup and not extend it out 50 to 90 years for the major needed work. The settlement funds should be used for cleanup sooner than later. We need to reduce the human and ecological risks by eliminating sources first not spending the money on building long term treatment system at this time. The proposed plan presented does not give us a clear plan of what is needed and how it could be best done.

I620-3 The plan as presented needs to be modified to focus more on getting the obvious contaminated sites that expose humans to contaminated materials and sites that have significant contaminated materials that are being eroded into the surface water and sediments along the stream and riverbanks and in the floodplains. The stopping movement and transport of the contaminated solid materials in the basin needs to be a priority. The contamination movement must be reduced so that cleaned up areas are not significantly recontaminated and that actions in the lower basin can be started.

I620-4 In the newspapers an alternate 10 Year Plan is being promoted but it is not an acceptable plan for the basin needs. I have limitedly reviewed the plan and find that it only addresses the upper basin from Wallace and above and that does not address some potentially significant sources correctly.

I620-5 The Focused Feasibility Study (FFS) presented is very confusing and shows that there are many sites that still need to be evaluated. In the report and the basin meetings about the FFS has shown that the understanding of many of the sites is very limited as to what is at the site, the

617804

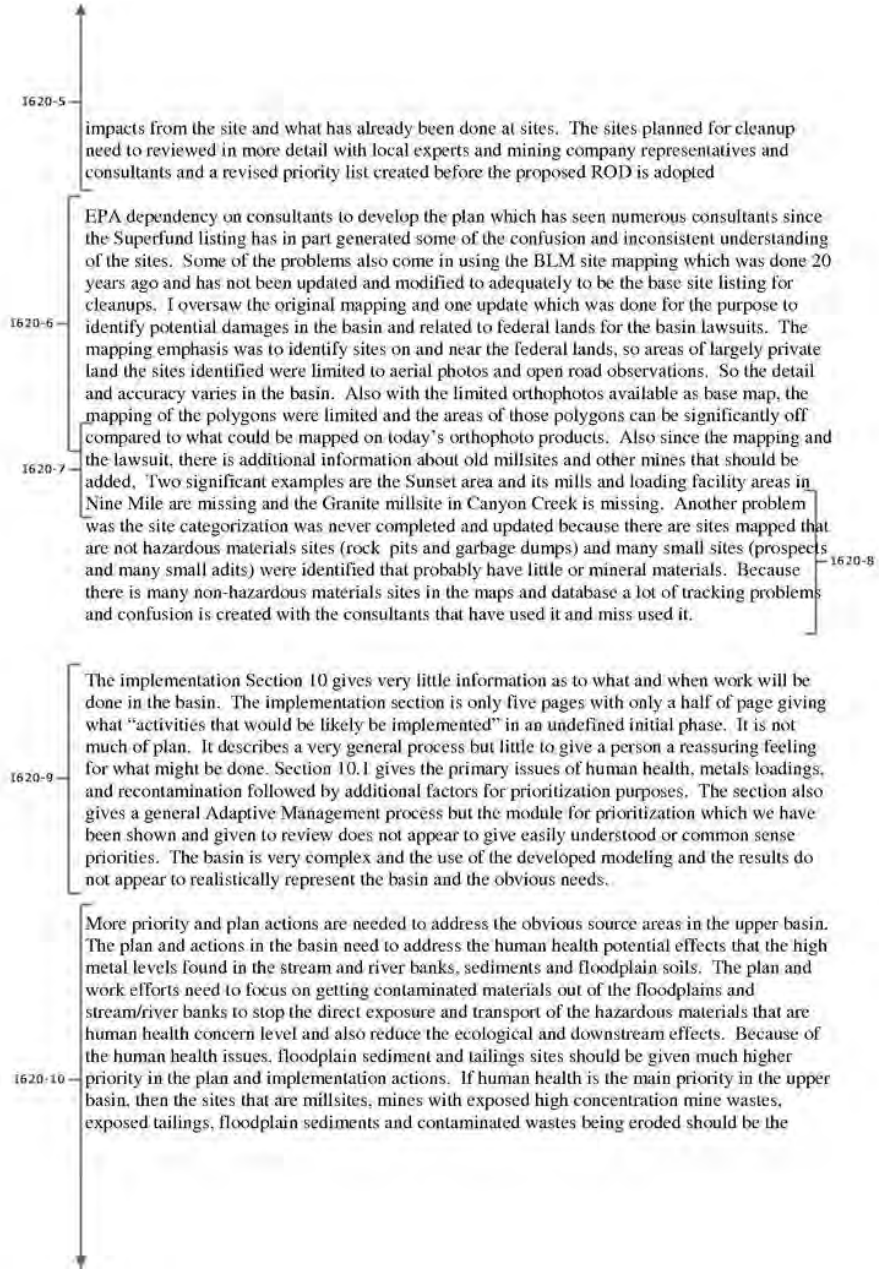
Response to comment I620-1
Thank you for your comment.

Response to comment I620-2
See responses to Comment Nos. I58-1 and I822-14, and the ROD Amendment, Part 2, Section 12.3.

Response to comment I620-3
See responses to Comment Nos. I58-1 and I54-5.

Response to comment I620-4
Comment noted.

Response to comment I620-5
See responses to Comment Nos. I58-1 and I822-14.



I620-5 impacts from the site and what has already been done at sites. The sites planned for cleanup need to reviewed in more detail with local experts and mining company representatives and consultants and a revised priority list created before the proposed ROD is adopted

I620-6 EPA dependency on consultants to develop the plan which has seen numerous consultants since the Superfund listing has in part generated some of the confusion and inconsistent understanding of the sites. Some of the problems also come in using the BLM site mapping which was done 20 years ago and has not been updated and modified to adequately to be the base site listing for cleanups. I oversaw the original mapping and one update which was done for the purpose to identify potential damages in the basin and related to federal lands for the basin lawsuits. The mapping emphasis was to identify sites on and near the federal lands, so areas of largely private land the sites identified were limited to aerial photos and open road observations. So the detail and accuracy varies in the basin. Also with the limited orthophotos available as base map, the mapping of the polygons were limited and the areas of those polygons can be significantly off compared to what could be mapped on today's orthophoto products. Also since the mapping and

I620-7 the lawsuit, there is additional information about old millsites and other mines that should be added, Two significant examples are the Sunset area and its mills and loading facility areas in Nine Mile are missing and the Granite millsite in Canyon Creek is missing. Another problem was the site categorization was never completed and updated because there are sites mapped that are not hazardous materials sites (rock pits and garbage dumps) and many small sites (prospects and many small adits) were identified that probably have little or mineral materials. Because there is many non-hazardous materials sites in the maps and database a lot of tracking problems and confusion is created with the consultants that have used it and miss used it. I620-8

I620-9 The implementation Section 10 gives very little information as to what and when work will be done in the basin. The implementation section is only five pages with only a half of page giving what "activities that would be likely be implemented" in an undefined initial phase. It is not much of plan. It describes a very general process but little to give a person a reassuring feeling for what might be done. Section 10.1 gives the primary issues of human health, metals loadings, and recontamination followed by additional factors for prioritization purposes. The section also gives a general Adaptive Management process but the module for prioritization which we have been shown and given to review does not appear to give easily understood or common sense priorities. The basin is very complex and the use of the developed modeling and the results do not appear to realistically represent the basin and the obvious needs.

I620-10 More priority and plan actions are needed to address the obvious source areas in the upper basin. The plan and actions in the basin need to address the human health potential effects that the high metal levels found in the stream and river banks, sediments and floodplain soils. The plan and work efforts need to focus on getting contaminated materials out of the floodplains and stream/river banks to stop the direct exposure and transport of the hazardous materials that are human health concern level and also reduce the ecological and downstream effects. Because of the human health issues, floodplain sediment and tailings sites should be given much higher priority in the plan and implementation actions. If human health is the main priority in the upper basin, then the sites that are millsites, mines with exposed high concentration mine wastes, exposed tailings, floodplain sediments and contaminated wastes being eroded should be the

Response to comment I620-6

EPA recognizes that the original mapping that was done by Bureau of Land Management was based on limited information at the time and included any site where there may have been some sort of mining or exploration activity. Over time this larger list has been screened by EPA and other stakeholders and prioritized in order to identify the most important sites. This process is ongoing. See response to Comment No. I822-14. Sites included in the Selected Remedy will be further evaluated in the design phase to obtain more detailed information in order to determine the extent of cleanup required.

Response to comment I620-7

Comment noted. If other sites are identified that warrant action, that were not part of those carried through the RI/FS, they can be added through future decision documents.

Response to comment I620-8

See response to Comment No. I822-14.

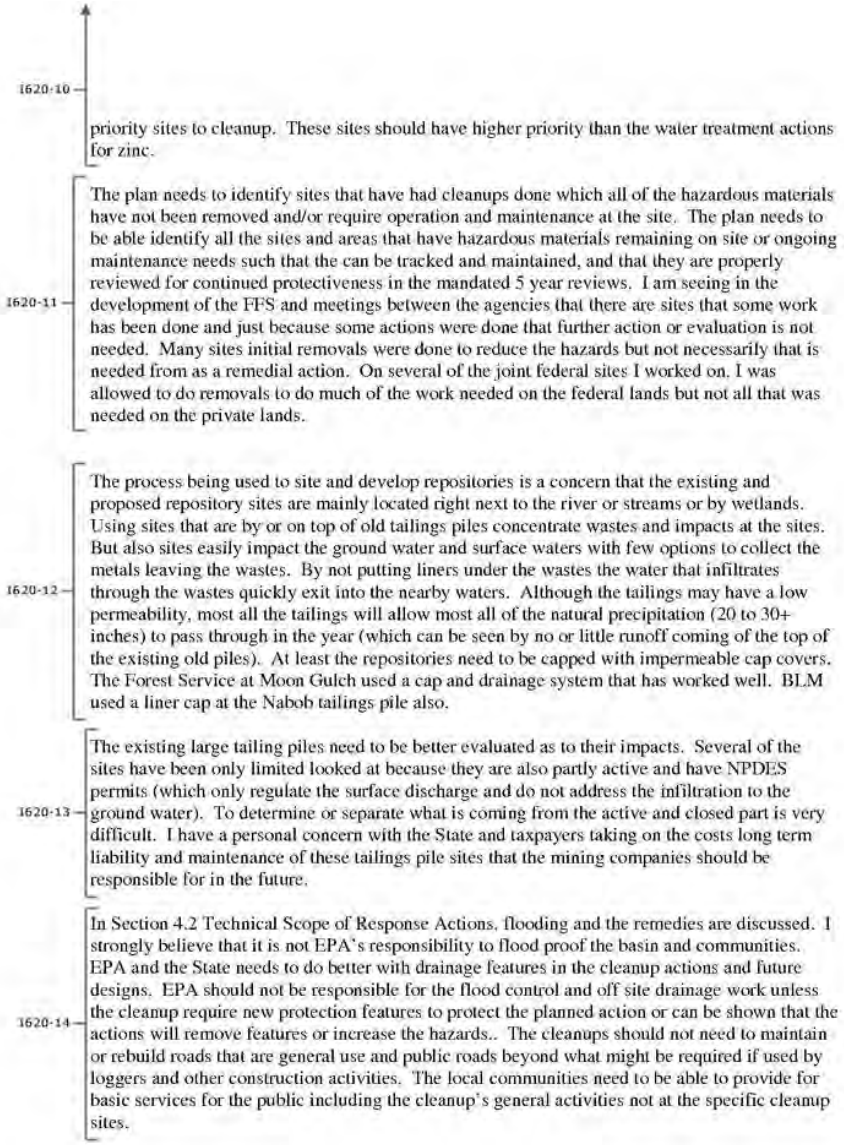
Response to comment I620-9

Section 10.0 of the Proposed Plan is not intended to serve as an Implementation Plan for the Selected Remedy but rather an overview of what the implementation process will be.

As noted in the Proposed Plan, a Draft Implementation Plan has been in development and is being published in parallel with the ROD Amendment. This implementation plan will act as a "living document" to identify priority projects and guide the actions selected in the ROD Amendment. There will be regular opportunities for review of this document. It is through these public review periods, as well as ongoing Project Focus Team meetings, that comments related to priority setting will be discussed and considered. Also see the ROD Amendment, Part 2, Section 12.3.

Response to comment I620-10

Regarding prioritization of sites, see the ROD Amendment, Part 2, Section 12.3.3 and response to Comment No. I822-14.



I620-10 priority sites to cleanup. These sites should have higher priority than the water treatment actions for zinc.

I620-11 The plan needs to identify sites that have had cleanups done which all of the hazardous materials have not been removed and/or require operation and maintenance at the site. The plan needs to be able identify all the sites and areas that have hazardous materials remaining on site or ongoing maintenance needs such that the can be tracked and maintained, and that they are properly reviewed for continued protectiveness in the mandated 5 year reviews. I am seeing in the development of the FFS and meetings between the agencies that there are sites that some work has been done and just because some actions were done that further action or evaluation is not needed. Many sites initial removals were done to reduce the hazards but not necessarily that is needed from as a remedial action. On several of the joint federal sites I worked on. I was allowed to do removals to do much of the work needed on the federal lands but not all that was needed on the private lands.

I620-12 The process being used to site and develop repositories is a concern that the existing and proposed repository sites are mainly located right next to the river or streams or by wetlands. Using sites that are by or on top of old tailings piles concentrate wastes and impacts at the sites. But also sites easily impact the ground water and surface waters with few options to collect the metals leaving the wastes. By not putting liners under the wastes the water that infiltrates through the wastes quickly exit into the nearby waters. Although the tailings may have a low permeability, most all the tailings will allow most all of the natural precipitation (20 to 30+ inches) to pass through in the year (which can be seen by no or little runoff coming of the top of the existing old piles). At least the repositories need to be capped with impermeable cap covers. The Forest Service at Moon Gulch used a cap and drainage system that has worked well. BLM used a liner cap at the Nabob tailings pile also.

I620-13 The existing large tailing piles need to be better evaluated as to their impacts. Several of the sites have been only limited looked at because they are also partly active and have NPDES permits (which only regulate the surface discharge and do not address the infiltration to the ground water). To determine or separate what is coming from the active and closed part is very difficult. I have a personal concern with the State and taxpayers taking on the costs long term liability and maintenance of these tailings pile sites that the mining companies should be responsible for in the future.

I620-14 In Section 4.2 Technical Scope of Response Actions, flooding and the remedies are discussed. I strongly believe that it is not EPA's responsibility to flood proof the basin and communities. EPA and the State needs to do better with drainage features in the cleanup actions and future designs. EPA should not be responsible for the flood control and off site drainage work unless the cleanup require new protection features to protect the planned action or can be shown that the actions will remove features or increase the hazards.. The cleanups should not need to maintain or rebuild roads that are general use and public roads beyond what might be required if used by loggers and other construction activities. The local communities need to be able to provide for basic services for the public including the cleanup's general activities not at the specific cleanup sites.

Response to comment I620-11

Over time, cleanup actions have been conducted by EPA, other agencies, and property owners within the Upper Basin. The majority of actions taken at these sites focused on human health risks, but in some cases additional actions were taken to reduce contaminant loading to surface and groundwater. Currently, sites where cleanup actions have been conducted are being monitored to determine their effectiveness in meeting RAOs. Review of the monitoring results and the protectiveness of these cleanup actions are documented in Five-Year Reviews consistent with CERCLA and the 2002 ROD for OU 3 (EPA, 2002; www.epa.gov/superfund/sites/rods/fulltext/r1002032.pdf). Potential shortcomings of these cleanup actions in achieving RAOs and protection of human health and the environment will be addressed as part of the Five-Year Review process. Any addition actions that may be required at these sites will be conducted under the authority of the original documents that implemented those actions i.e., 2002 OU3 ROD.

Response to comment I620-12

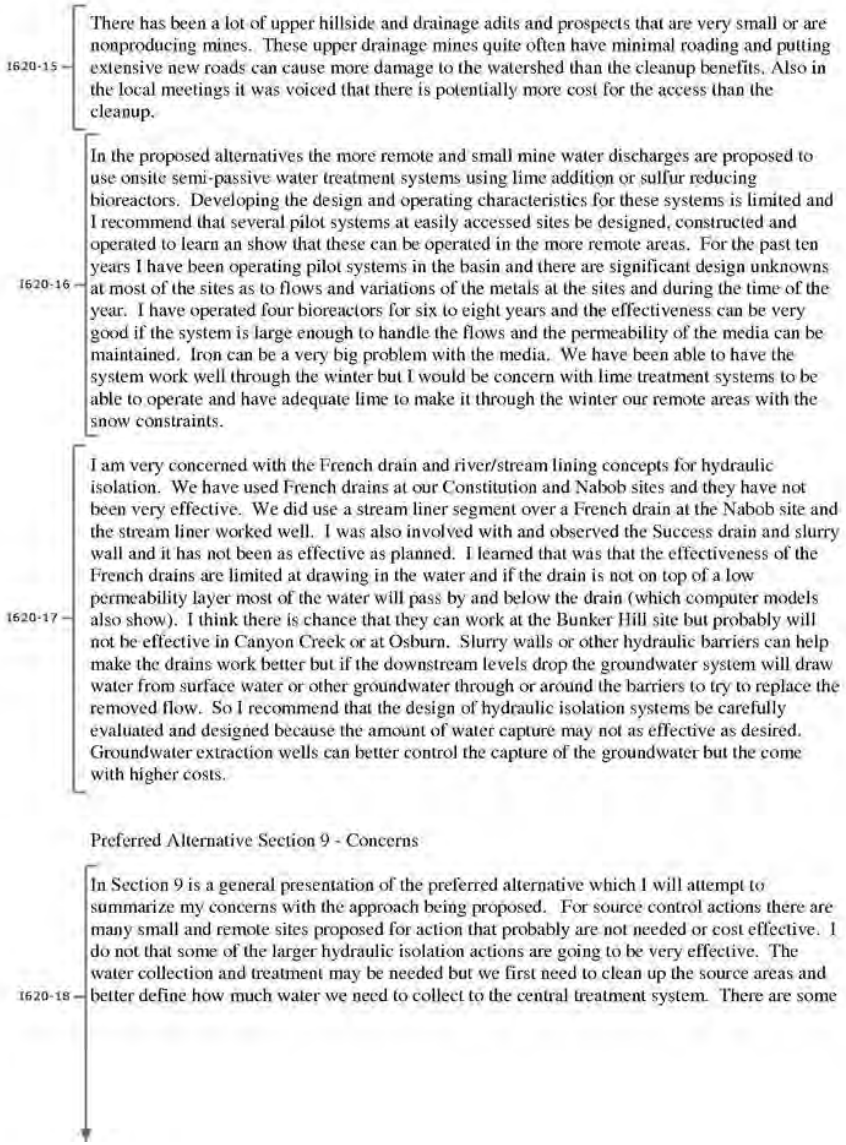
See response to comment I54-3.

Response to comment I620-13

See responses to Comment Nos. I58-5 and I295-3.

Response to comment I620-14

Comment noted. See response to Comment No. LJ36-3.



I620-15 There has been a lot of upper hillside and drainage adits and prospects that are very small or are nonproducing mines. These upper drainage mines quite often have minimal roading and putting extensive new roads can cause more damage to the watershed than the cleanup benefits. Also in the local meetings it was voiced that there is potentially more cost for the access than the cleanup.

I620-16 In the proposed alternatives the more remote and small mine water discharges are proposed to use onsite semi-passive water treatment systems using lime addition or sulfur reducing bioreactors. Developing the design and operating characteristics for these systems is limited and I recommend that several pilot systems at easily accessed sites be designed, constructed and operated to learn an show that these can be operated in the more remote areas. For the past ten years I have been operating pilot systems in the basin and there are significant design unknowns at most of the sites as to flows and variations of the metals at the sites and during the time of the year. I have operated four bioreactors for six to eight years and the effectiveness can be very good if the system is large enough to handle the flows and the permeability of the media can be maintained. Iron can be a very big problem with the media. We have been able to have the system work well through the winter but I would be concern with lime treatment systems to be able to operate and have adequate lime to make it through the winter our remote areas with the snow constraints.

I620-17 I am very concerned with the French drain and river/stream lining concepts for hydraulic isolation. We have used French drains at our Constitution and Nabob sites and they have not been very effective. We did use a stream liner segment over a French drain at the Nabob site and the stream liner worked well. I was also involved with and observed the Success drain and slurry wall and it has not been as effective as planned. I learned that was that the effectiveness of the French drains are limited at drawing in the water and if the drain is not on top of a low permeability layer most of the water will pass by and below the drain (which computer models also show). I think there is chance that they can work at the Bunker Hill site but probably will not be effective in Canyon Creek or at Osburn. Slurry walls or other hydraulic barriers can help make the drains work better but if the downstream levels drop the groundwater system will draw water from surface water or other groundwater through or around the barriers to try to replace the removed flow. So I recommend that the design of hydraulic isolation systems be carefully evaluated and designed because the amount of water capture may not as effective as desired. Groundwater extraction wells can better control the capture of the groundwater but the come with higher costs.

Preferred Alternative Section 9 - Concerns

I620-18 In Section 9 is a general presentation of the preferred alternative which I will attempt to summarize my concerns with the approach being proposed. For source control actions there are many small and remote sites proposed for action that probably are not needed or cost effective. I do not that some of the larger hydraulic isolation actions are going to be very effective. The water collection and treatment may be needed but we first need to clean up the source areas and better define how much water we need to collect to the central treatment system. There are some

Response to comment I620-15

As noted in the response to Comment No. I58-1, the scope of the Selected Remedy has been significantly reduced. Consequently, significantly fewer sources in remote areas will need to be accessed. Those sources which will need to be accessed in remote locations have been determined to be sufficiently significant to require remediation. EPA will seek to minimize damage to the environment in accessing them. Final details regarding access will be determined during design.

Response to comment I620-16

See response to Comment No. I899-7.

Response to comment I620-17

Since the NAS review, EPA has conducted studies to evaluate groundwater-surface water interactions and characterize aquifer properties in key areas of the Upper Basin; conducted pilot studies for groundwater treatment; and evaluated the cost of implementing various groundwater treatment technologies. This information has enabled hydraulic isolation actions to be refined. For example, as a result of this work it was determined that though active water collection options (extraction wells) have relatively low estimated capital and 30-year NPV costs compared to the passive water collection options (French drains), the number of wells needed to replace to function of the drains is relatively high. For example, an estimated 41 wells would be needed in Woodland Park to replace the planned French drain in that location. These wells would need to be constantly monitored and adjusted to maintain the desired hydraulic control with seasonally fluctuating flows. French drains will be tested at the site prior to implementation. Information collected during testing will be used to inform decisions about groundwater collection methods to be used throughout the Bunker Hill Superfund Site. Specific groundwater collection methods will also be evaluated on a site-by-site basis during remedial design, when more site-specific information will be available. If the results of drain testing and site-specific design activities indicate than an alternative groundwater collection method (such as wells) would be most appropriate for a given site, then those alternative methods will be used. This approach is consistent with EPA's adaptive management of Site cleanup activities.

Response to comment I620-18

See responses to Comment Nos. I58-1 and I899-7.

I620-18 valid concerns with the onsite and passive treatment systems can be designed and operated effectively. Until we know better the flows from the sites and if the onsite treatment systems work effectively, the upper basin collection system and upgrading of plant for the upper sites needs to be deferred. The Bunker Hill Box action could be the test area for lining and drains before it is used in the upper basin. Until we know that we can effectively collect, isolate and handle the flows, we should not install the upper basin conveyance and plant upgrade for it. Further evaluations should be done to see if there should be a need for capturing groundwater flows also at the lower end of Smelterville.

Specific Proposed Plan and FFS Site Comments

To show some of the problems with the development of FFS, the following is a limited quick review and presentation of some of the site issues. Using Table D-1 the following is sites that I would not include as priority and potential cleanup sites and other issues examples. Starting with Big Creek, several sites listed for cleanup are above the municipal water intakes and the West Fork sites are in unroaded areas. Site I would not include would be POL010, 044, 052, 066, 067 and 068.

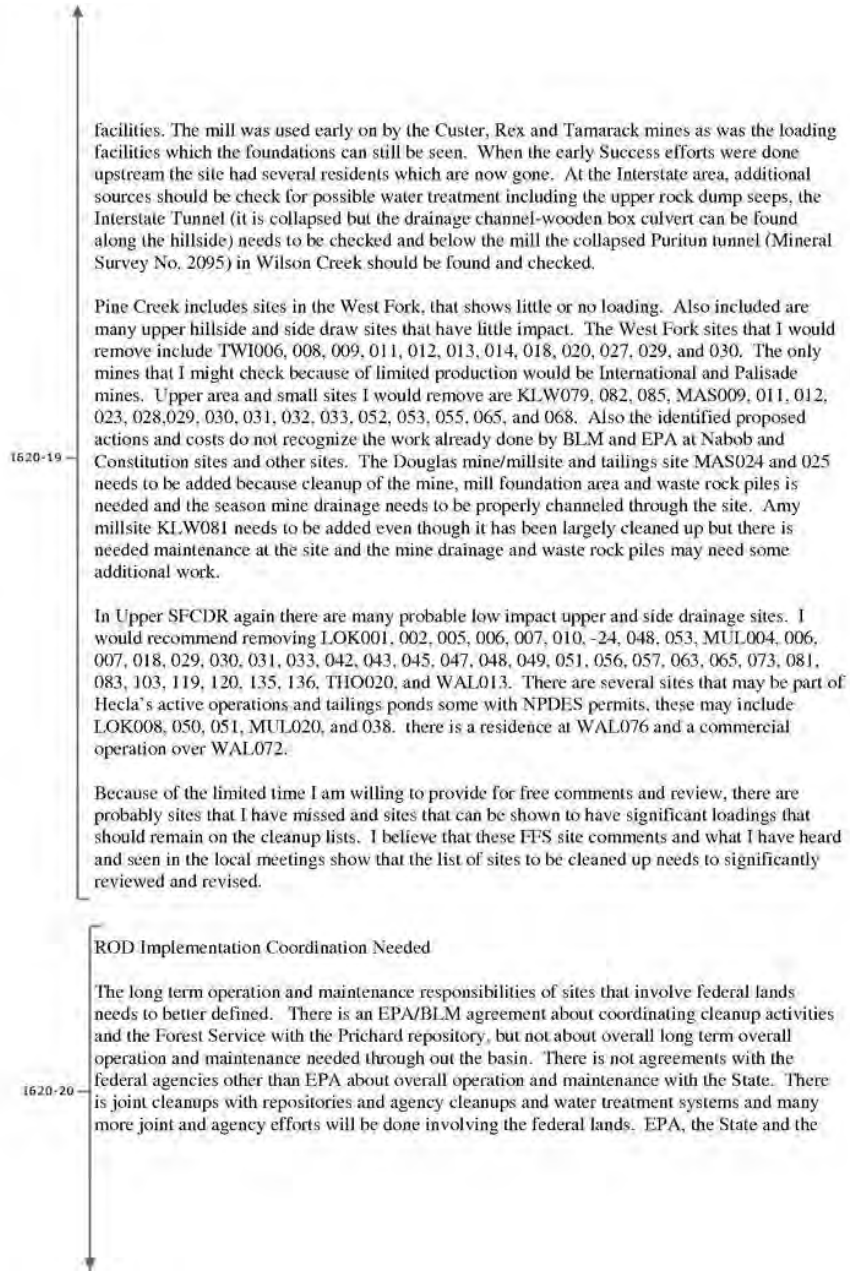
In Canyon Creek there are several nonproducing mines and upper hillside mines included. Some of the sites that I question that should be included are BUR006, 068, 089,094, 099, 105, 112, 125, 133, 134, 135, 176,177,185, 187, 189, 204 and THO023. In the Canyon Creek Woodland Park I would not include WAL012. Other issues at sites include why the garbage dump BUR150 and landfill (dump) WAL081 would be part of the mine cleanups. There are also active NPDES sites included of Hecla-Star Mine/Millsite BUR 128 and Tailings Piles WAL009 that they should be responsible for. Missing is the Granite millsite in the upper part of BUR141.

I620-19 Mainstem SFCDR areas include many upper drainage sites which I would consider removing including KLE016, 023, 051, 066, 067, 068, 069, 070, MUL085, 086, OSB025, 030, 070, 072, 074, 075, 076, 078, POL021, 064, WAL016, 024, 046, 055, 056, 057, 058, 062, 064, 072, and 073. There is a large group of the WAL sites that are in the West Fork of Placer Creek that are again above the municipal water intakes and roading access would be very damaging. Also in this segment there are several active mine sites and commercial sites such as KLE075, OSB119, WAL001 WAL020 and WAL035 The last being a rock pit what should not be a hazardous materials site). Moon Creek also has several upper drainage I would probably remove including KLE008, 061, 063, 064, and 065.

In Nine Mile Creek there is not many upper drainage sites included but I would remove BUR052 and WAL006. I would also probably recommend removing the Black Cloud Creek group because the area is used as a water source and without any significant producing mines, so the area is probably a low hazard area. Improving the stream channel and drainage features through the Black Cloud community to protect the yard cleanups might be a better justification for the work. The upper Black Cloud sites include OSB032, 033, 038, 082, 084, and 085. Also the old Black Cloud millsite, OSB061, was largely capped by the yard program since a trailer home is located there now. Missing in Nine Mile is the Sunset Area in the OSB057 reach which was the location of a early community where the railroad ended with the old millsite and loading

Response to comment I620-19

See response to Comment No. I620-10 above.



facilities. The mill was used early on by the Custer, Rex and Tamarack mines as was the loading facilities which the foundations can still be seen. When the early Success efforts were done upstream the site had several residents which are now gone. At the Interstate area, additional sources should be check for possible water treatment including the upper rock dump seeps, the Interstate Tunnel (it is collapsed but the drainage channel-wooden box culvert can be found along the hillside) needs to be checked and below the mill the collapsed Puritun tunnel (Mineral Survey No. 2095) in Wilson Creek should be found and checked.

Pine Creek includes sites in the West Fork, that shows little or no loading. Also included are many upper hillside and side draw sites that have little impact. The West Fork sites that I would remove include TWI006, 008, 009, 011, 012, 013, 014, 018, 020, 027, 029, and 030. The only mines that I might check because of limited production would be International and Palisade mines. Upper area and small sites I would remove are KLW079, 082, 085, MAS009, 011, 012, 023, 028,029, 030, 031, 032, 033, 052, 053, 055, 065, and 068. Also the identified proposed actions and costs do not recognize the work already done by BLM and EPA at Nabob and Constitution sites and other sites. The Douglas mine/millsite and tailings site MAS024 and 025 needs to be added because cleanup of the mine, mill foundation area and waste rock piles is needed and the season mine drainage needs to be properly channeled through the site. Amy millsite KLW081 needs to be added even though it has been largely cleaned up but there is needed maintenance at the site and the mine drainage and waste rock piles may need some additional work.

I620-19

In Upper SFCDR again there are many probable low impact upper and side drainage sites. I would recommend removing LOK001, 002, 005, 006, 007, 010, -24, 048, 053, MUL004, 006, 007, 018, 029, 030, 031, 033, 042, 043, 045, 047, 048, 049, 051, 056, 057, 063, 065, 073, 081, 083, 103, 119, 120, 135, 136, THO020, and WAL013. There are several sites that may be part of Hecla's active operations and tailings ponds some with NPDES permits, these may include LOK008, 050, 051, MUL020, and 038. there is a residence at WAL076 and a commercial operation over WAL072.

Because of the limited time I am willing to provide for free comments and review, there are probably sites that I have missed and sites that can be shown to have significant loadings that should remain on the cleanup lists. I believe that these FFS site comments and what I have heard and seen in the local meetings show that the list of sites to be cleaned up needs to significantly reviewed and revised.

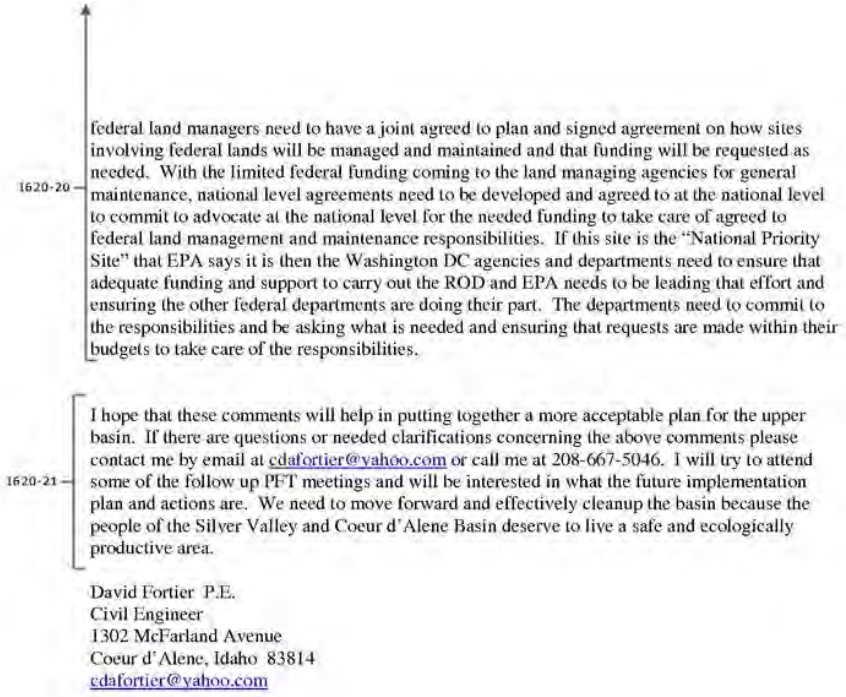
ROD Implementation Coordination Needed

The long term operation and maintenance responsibilities of sites that involve federal lands needs to better defined. There is an EPA/BLM agreement about coordinating cleanup activities and the Forest Service with the Prichard repository, but not about overall long term overall operation and maintenance needed through out the basin. There is not agreements with the federal agencies other than EPA about overall operation and maintenance with the State. There is joint cleanups with repositories and agency cleanups and water treatment systems and many more joint and agency efforts will be done involving the federal lands. EPA, the State and the

I620-20

Response to comment I620-20

EPA agrees with your comment. During the development of the Focused Feasibility Study and previous decision documents, EPA has met regularly with the Basin Commission's Technical Leadership Group, a group focused on technical issues related to cleanup and primarily composed of interested citizens, representatives from the State of Idaho, Shoshone County, the U.S. Bureau of Land Management, the U.S. Fish and Wildlife Service, the U.S. Forest Service, the Spokane Tribe, the Coeur d'Alene Tribe, and the State of Washington. EPA will continue to work with these key stakeholders as the cleanup moves forward in order to address the long-term responsibilities associated with the cleanup actions. Development of national agreements and commitments of funding will require participation of all key stakeholder to resolve these complex multi-jurisdictional issues.



federal land managers need to have a joint agreed to plan and signed agreement on how sites involving federal lands will be managed and maintained and that funding will be requested as needed. With the limited federal funding coming to the land managing agencies for general maintenance, national level agreements need to be developed and agreed to at the national level to commit to advocate at the national level for the needed funding to take care of agreed to federal land management and maintenance responsibilities. If this site is the "National Priority Site" that EPA says it is then the Washington DC agencies and departments need to ensure that adequate funding and support to carry out the ROD and EPA needs to be leading that effort and ensuring the other federal departments are doing their part. The departments need to commit to the responsibilities and be asking what is needed and ensuring that requests are made within their budgets to take care of the responsibilities.

I620-20

I hope that these comments will help in putting together a more acceptable plan for the upper basin. If there are questions or needed clarifications concerning the above comments please contact me by email at cdafortier@yahoo.com or call me at 208-667-5046. I will try to attend some of the follow up PFT meetings and will be interested in what the future implementation plan and actions are. We need to move forward and effectively cleanup the basin because the people of the Silver Valley and Coeur d'Alene Basin deserve to live a safe and ecologically productive area.

I620-21

David Fortier P.E.
Civil Engineer
1302 McFarland Avenue
Coeur d'Alene, Idaho 83814
cdafortier@yahoo.com

Response to comment I620-21

Thank you for your comments and for your input on the Bunker Hill Superfund Site cleanup plans.

Fosberg, Jeanne, I278, Letter 616015-42

Jeanne Fosberg: I was born and raised here. I am 78 and a half years old and a lot of these people are my students so don't you dare say anything bad about my students, okay? [Applause] Now, I – you know guys had all - no one ever spells any words out. Any words because EPA and [AA use] that crap. Well EPA, as far as I'm concerned stands for the Enemy of the People of America [laughter]. What they have done to preserve our country is amazing. You consider these not with our place but the other places, the other end shall we say. Places that have been closed down because of them and the business is now over in a foreign country especially the ones – if I try to remember right, it was World War II. Now during World War II here, these mines were so busy. We had to use blackout curtains at night and that I will get to. Anyway, we had to use blackout curtains because we were producing things for the military. Now if you close us down, we can't protect our country. So as far as I'm concerned, EPA, you have 90 days to get your ass out of here. I278-1

Mike Brandstaedter: We need the help of our elected officials. If you won't help us by bringing reason to this massive project, there is no hope and we have no help. I look upon the state particularly to help us. I view this proposal as containing very serious legal, complex questions regarding water rights and I urge you to look into it. I think that it should be delayed until the Northern Idaho adjudication process is further developed so that we understand what water is available for this project. It's an enormous scope. We don't have the horsepower in this room to fight this. We don't have the money. We don't have the time and we don't have the expertise. We all feel that it's going to happen. It's a question of how extensive is it going to be and the feeling is that what the EPA has proposed is what will be. Finally, we just need that our jobs here are protected, our mining and our land [use]. I am particularly offended when I hear the phrase "responsible mining." I've done a lot of work with mining companies. It's the most regulated industry in America.

Female: That's right.

Mike Brandstaedter: You can't do anything without complying with laws and regulations. So to call it responsible is hedgy. Are you going to allow mining or aren't you? Thank you.

Response to comment I278-1

Comment noted.

Foster, Dale, I375, Letter 616263

November 9, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Public comment on proposed plan to cleanup Upper Coeur d'Alene (CdA) Basin

Delivered: via e-mail to: cdabasin@epa.gov

To whom it may concern –

I375-1 I am a Hayden, Idaho private citizen downstream of the upper CdA Basin. I support the EPA's proposed plan for cleaning up the upper CdA. Yes, the proposed plan covers a long time period, but in my opinion it is the best and most pragmatic approach to cleaning up this problem that took many decades on mining to produce.

I375-2 I believe it is deplorable that Hecla Mining Corporation is trying to undermine (no pun intended) the EPA's plan in a thinly veiled attempt to minimize their responsibilities towards the cost of the cleanup. Taxpayer should not bear the majority burden of the

I375-3 cleanup cost and thus EPA should make the polluters pay to the extent it is possible to hold those parties accountable. I oppose the alternative plan proposed by Hecla. Hecla's heart, mind and checkbook does not appear to support doing the right thing for the area by supporting a thorough and effective cleanup. They also appear to be engaged in a mis-information campaign to undermine the EPA plan and simply be done with the cleanup efforts. I375-4

I375-5 EPA is to be applauded for their on-going efforts to cleanup the Silver Valley and protect the downstream watershed. .It is EPA's mandate to protect human health and a proper and thorough cleanup is needed. I encourage EPA to stick with your plan.

Sincerely,

Dale Foster
12488 N. Shamrock St.
Hayden, ID 83835
e-mail: dale.foster@roadrunner.com

616263

Response to comment I375-1
Comment noted and appreciated.

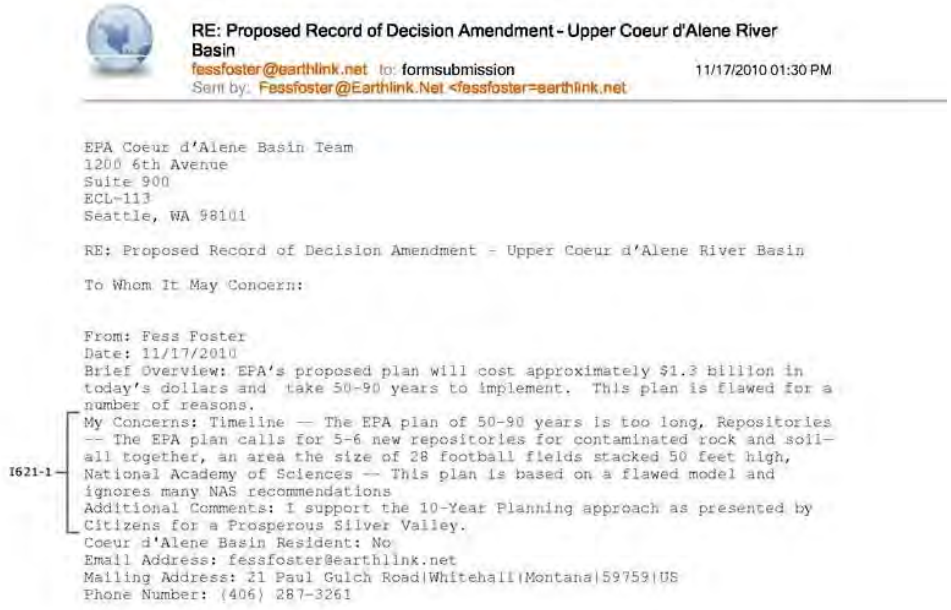
Response to comment I375-2
Thank you for your comment.

Response to comment I375-3
See response to Comment No. I295-3.

Response to comment I375-4
Thank you for your comment.

Response to comment I375-5
Thank you for your comment.

Foster, Fess, I621, Letter 617805



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
fessfoster@earthlink.net to: formsubmission 11/17/2010 01:30 PM
Sent by: Fessfoster@Earthlink.Net <fessfoster=earthlink.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Fess Foster
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I621-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil- all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: fessfoster@earthlink.net
Mailing Address: 21 Paul Gulch Road|Whitehall|Montana|59759|US
Phone Number: (406) 287-3261

617805

Response to comment I621-1

See response to Comment No. I351-1.

Fox, Fred, I622, Letter 617806

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
fred.fox@comcast.net to: formsubmission 11/17/2010 02:28 PM
Sent by: Fred.Fox@Comcast.Net <fred.fox=comcast.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Fred Fox
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

Now is not the time to waste federal tax dollars on such a wasteful and stupid plan that goes way too far in scope and unnessary expenditures.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: fred.fox@comcast.net
Mailing Address: Fred Fox, PO Box 681981|Park City|UT|84068|US
Phone Number:

I622-1

617806

Response to comment I622-1

See response to Comment No. I351-1.

Frago, Fred, I623, Letter 617807

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
thifort@frontier.com to: formsubmission 11/18/2010 10:26 AM
Sent by: Thifort@Frontier.Com <thifort=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Frank Frago
Date: 11/18/2010
Brief Overview: This EPA plan is too lengthy and way too costly! There is a locally drawn-up plan that is much better and only takes ten years in duration. It protects areas already cleaned up, it focuses on the key historic mining areas above Wallace and in the Box, it is based on real data, it uses proven technologies, it embraces the National Academy of Sciences advice, and it costs much less. As as a citizen of this beautiful Silver Valley, I ask, no, demand the EPA listen to the people that live here and have to endure whatever whim this agency comes up with..
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: thifort@frontier.com
Mailing Address: PO Box 596 Pinehurst, Id. 83850, 605 Nevada St.|Pinehurst|Idaho|83850|US
Phone Number:

1623-1
1623-2

617807

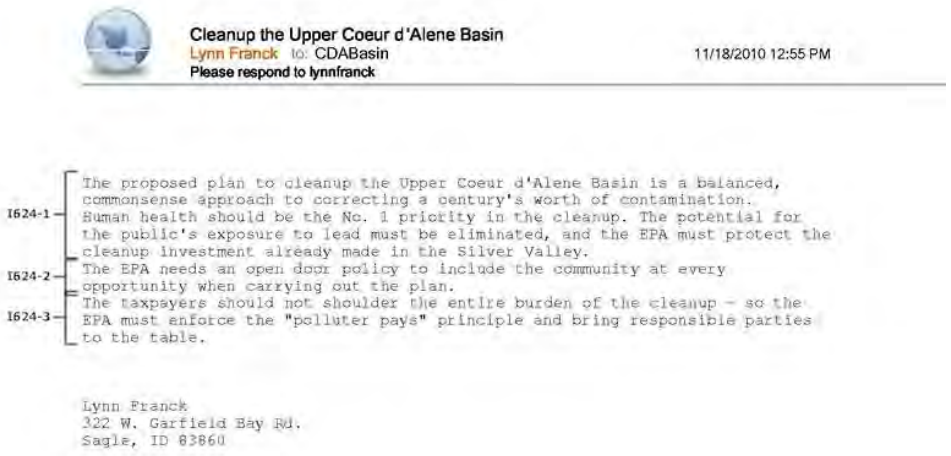
Response to comment I623-1

See responses to Comment Nos. I474-2, I54-5, and LJ27-8.

Response to comment I623-2

See response to Comment No. I351-1.

Franck, Lynn, I624, Letter 617808



Cleanup the Upper Coeur d'Alene Basin
Lynn Franck to: CDABasin 11/18/2010 12:55 PM
Please respond to lynnfranck

I624-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I624-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I624-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Lynn Franck
322 W. Garfield Bay Rd.
Sagle, ID 83860

617808

Response to comment I624-1

See response to Comment No. I295-1.

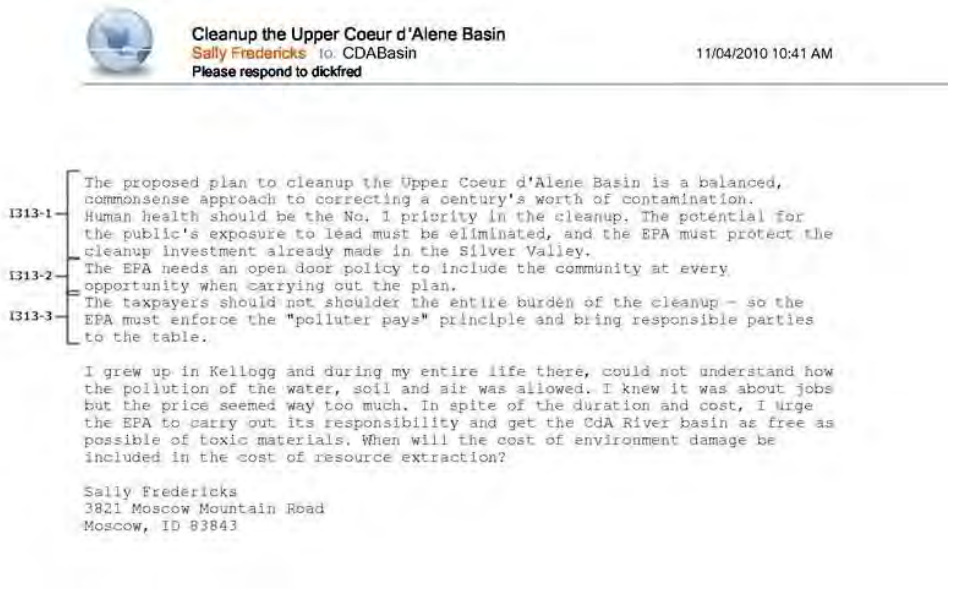
Response to comment I624-2

See response to Comment No. I295-2.

Response to comment I624-3

See response to Comment No. I295-3.

Fredericks, Sally, I313, Letter 614443



Cleanup the Upper Coeur d'Alene Basin
Sally Fredericks to: CDABasin 11/04/2010 10:41 AM
Please respond to dickfred

I313-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I313-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I313-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

I grew up in Kellogg and during my entire life there, could not understand how the pollution of the water, soil and air was allowed. I knew it was about jobs but the price seemed way too much. In spite of the duration and cost, I urge the EPA to carry out its responsibility and get the CdA River basin as free as possible of toxic materials. When will the cost of environment damage be included in the cost of resource extraction?

Sally Fredericks
3821 Moscow Mountain Road
Moscow, ID 83843

614443

Response to comment I313-1

See response to Comment No. I295-1.

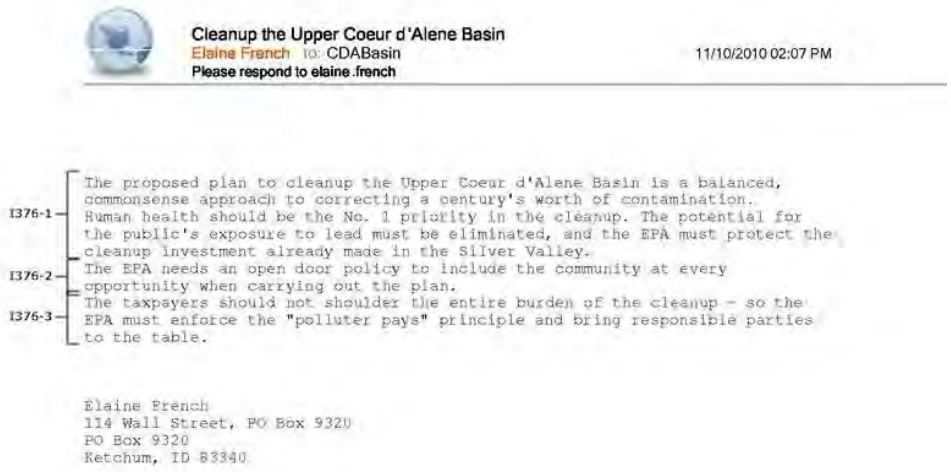
Response to comment I313-2

See response to Comment No. I295-2.

Response to comment I313-3

See response to Comment No. I295-3.

French, Elaine, I376, Letter 616264



Cleanup the Upper Coeur d'Alene Basin
Elaine French To: CDABasin 11/10/2010 02:07 PM
Please respond to elaine.french

I376-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I376-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I376-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Elaine French
114 Wall Street, PO Box 9320
PO Box 9320
Ketchum, ID 83340

616264

Response to comment I376-1

See response to Comment No. I295-1.

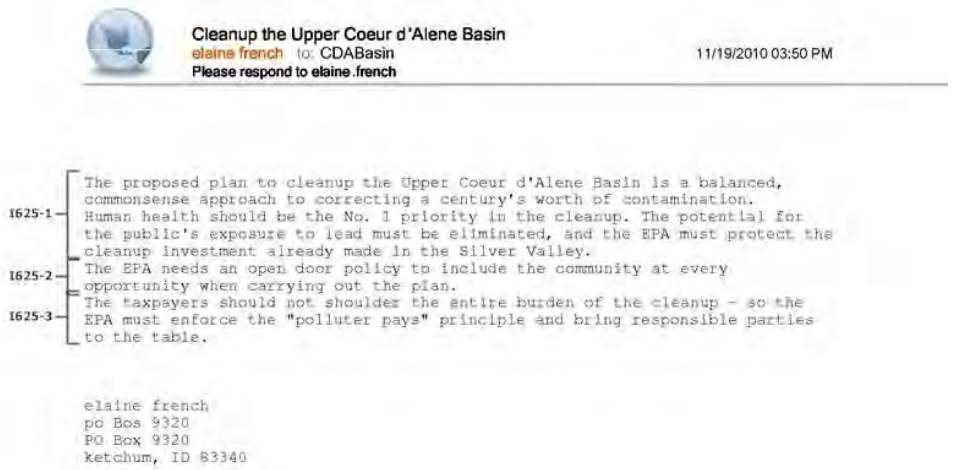
Response to comment I376-2

See response to Comment No. I295-2.

Response to comment I376-3

See response to Comment No. I295-3.

French, Elaine, I625, Letter 617809



Cleanup the Upper Coeur d'Alene Basin
elaine french to: CDABasin 11/19/2010 03:50 PM
Please respond to elaine.french

I625-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I625-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I625-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

elaine french
po Box 9320
PO Box 9320
ketchum, ID 83340

617809

Response to comment I625-1

See response to Comment No. I295-1.

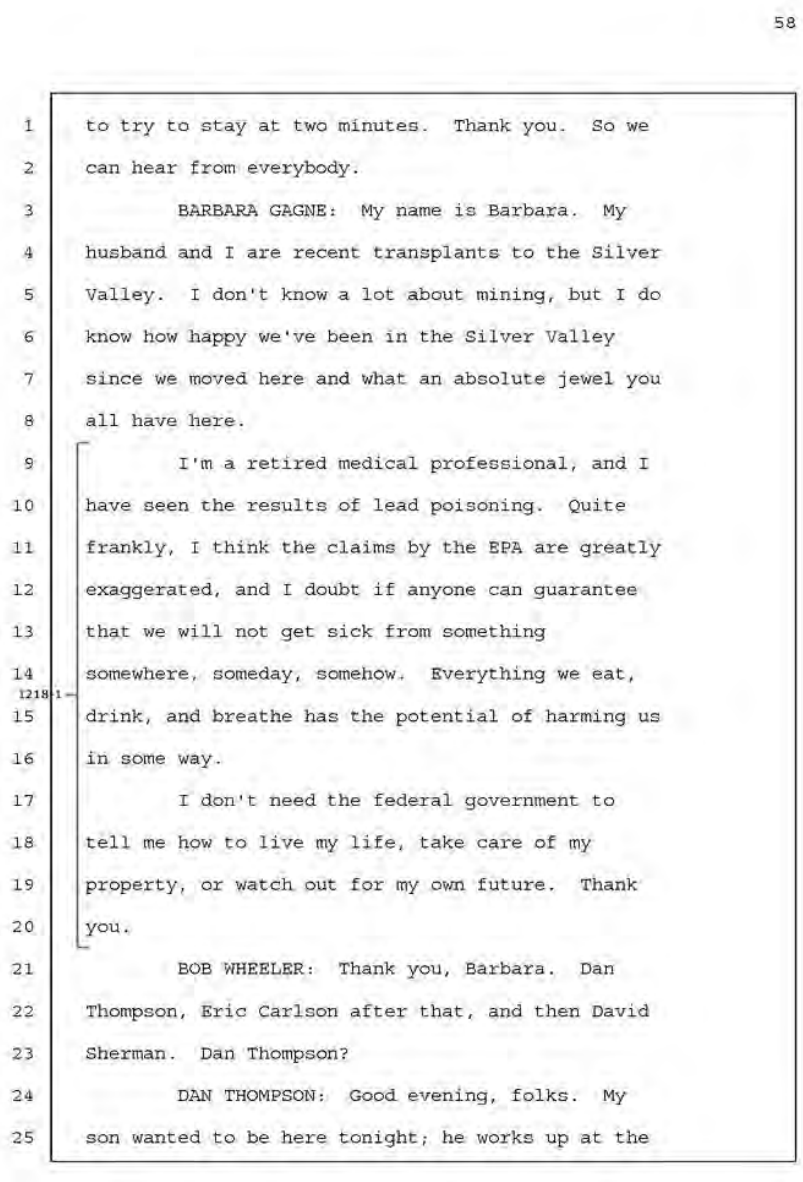
Response to comment I625-2

See response to Comment No. I295-2.

Response to comment I625-3

See response to Comment No. I295-3.

Gagne, Barbara, I218, Letter 610097-13



58

to try to stay at two minutes. Thank you. So we can hear from everybody.

BARBARA GAGNE: My name is Barbara. My husband and I are recent transplants to the Silver Valley. I don't know a lot about mining, but I do know how happy we've been in the Silver Valley since we moved here and what an absolute jewel you all have here.

I'm a retired medical professional, and I have seen the results of lead poisoning. Quite frankly, I think the claims by the EPA are greatly exaggerated, and I doubt if anyone can guarantee that we will not get sick from something somewhere, someday, somehow. Everything we eat, drink, and breathe has the potential of harming us in some way. I218-1

I don't need the federal government to tell me how to live my life, take care of my property, or watch out for my own future. Thank you.

BOB WHEELER: Thank you, Barbara. Dan Thompson, Eric Carlson after that, and then David Sherman. Dan Thompson?

DAN THOMPSON: Good evening, folks. My son wanted to be here tonight; he works up at the

Response to comment I218-1

EPA and other agencies have done many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. EPA is required under Comprehensive Environmental Response, Compensation, and Liability Act, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Gagne, Brenda, I626, Letter 617810

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
gagne.barbara@yahoo.com to: formsubmission 11/19/2010 08:02 AM
Sent by: Gagne.Barbara@Yahoo.Com <gagne.barbara=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Barbara Gagne
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons, all of which are correctly laid out in the "Citizens for a Prosperous Silver Valley" checklist and rebuttal, which I thoroughly agree with and support.
The EPA has become a self-proliferating federal entity with enormous intrusive power over our lives, our lands, and our futures, and robbed the citizens of their God given rights to freedom and self government. In labeling the Siver Valley as a "superfund" area, the EPA has literally labeled our area as a "valley of death" for investment, industry, real estate, and population growth.
I suggest the EPA return its attention, people, and enterprise to Washington, D.C., where the contamination levels within the government are posing a threat to our entire nation. The liberals in the White House and Congress are a much greater threat to the United States of America than any reported levels of lead or zinc within Idaho's northern borders.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: Enough is enough. Listen to the voices of the citizens of the Silver Valley who have lived and worked and died here. We are entitled to life, liberty, and the pursuit of happiness.....not the EPA destroying our land, our rights, and our livelihood.
Coeur d'Alene Basin Resident: Yes
Email Address: gagne.barbara@yahoo.com

617810

I626-1

I626-2

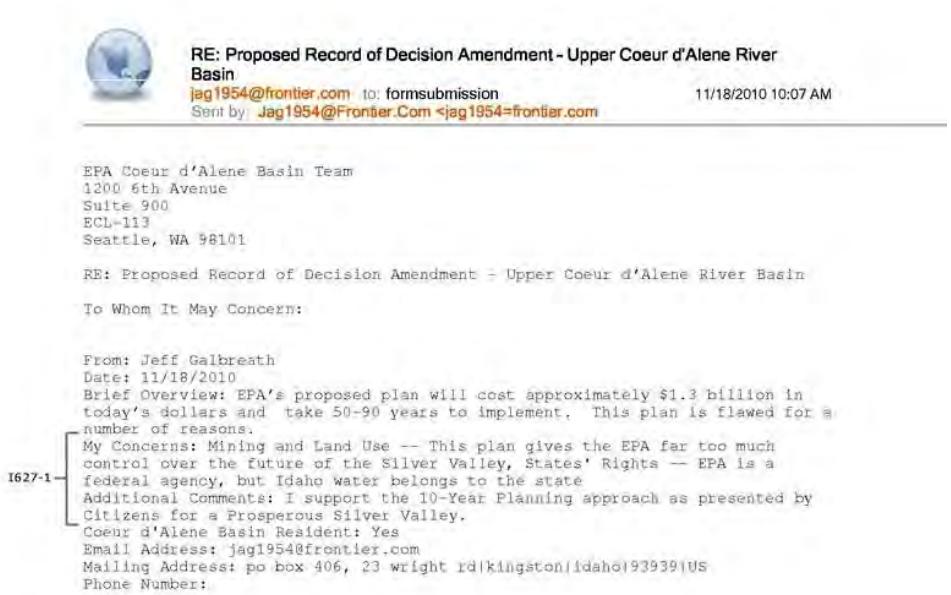
Response to comment I626-1

Comment noted.

Response to comment I626-2

See response to Comment No. I351-1.

Galbreath, Jeff, I627, Letter 617811



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jag1954@frontier.com to: formsubmission 11/18/2010 10:07 AM
Sent by: Jag1954@Frontier.Com <jag1954=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

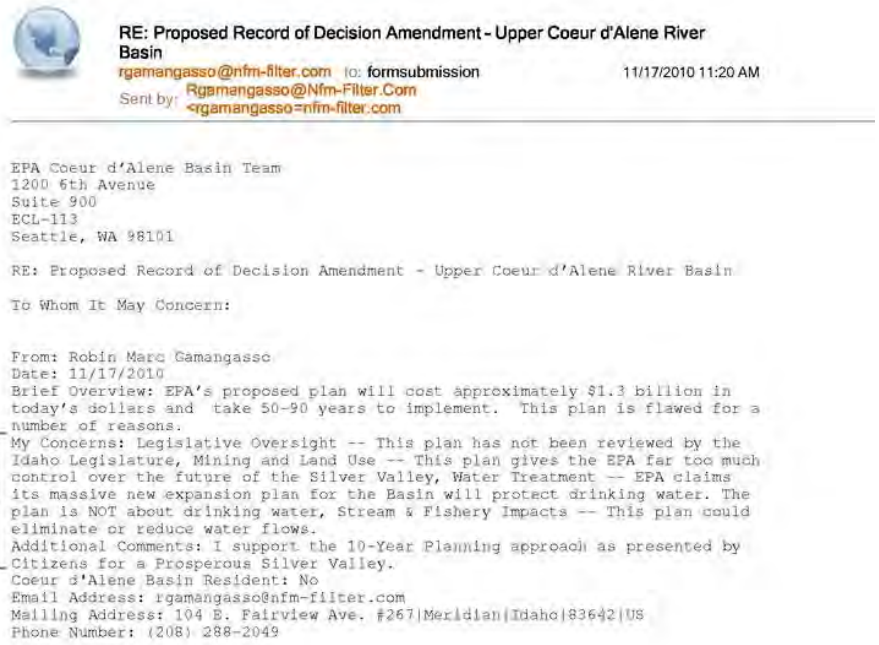
From: Jeff Galbreath
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I627-1 My Concerns: Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: jag1954@frontier.com
Mailing Address: po box 406, 23 wright rd|kingston|idaho|93939|US
Phone Number:

617811

Response to comment I627-1

See response to Comment No. I351-1.

Gamangasso, Robin, I628, Letter 617812



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
rgamangasso@nfm-filter.com to: formsubmission 11/17/2010 11:20 AM
Sent by: Rgamangasso@Nfm-Filter.Com <rgamangasso=nfm-filter.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Robin Marc Gamangasso
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows.
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: rgamangasso@nfm-filter.com
Mailing Address: 104 E. Fairview Ave. #267|Meridian|Idaho|83642|US
Phone Number: (208) 288-2049

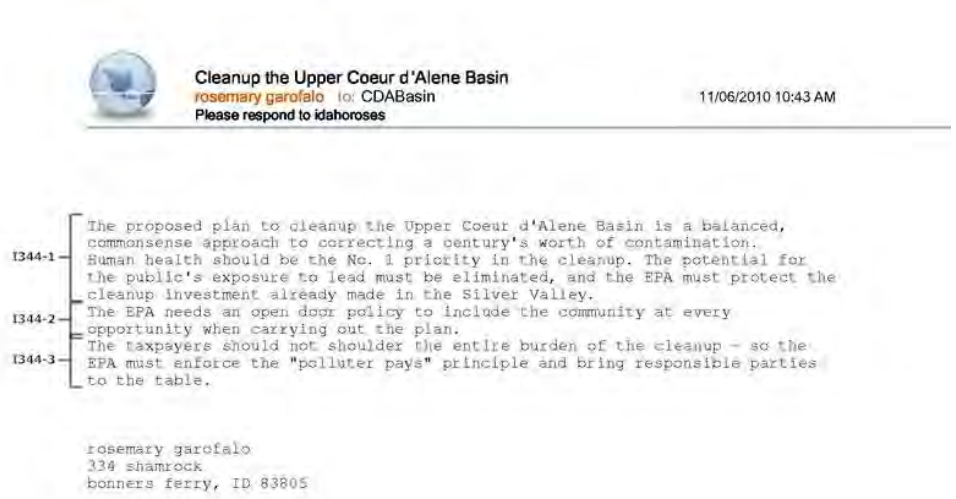
I628-1

617812

Response to comment I628-1

See response to Comment No. I351-1.

Garofalo, Rosemary, I344, Letter 614474



Cleanup the Upper Coeur d'Alene Basin
rosemary garofalo to: CDABasin 11/06/2010 10:43 AM
Please respond to idahoroses

I344-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I344-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I344-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

rosemary garofalo
334 shamrock
bonners ferry, ID 83805

614474

Response to comment I344-1

See response to Comment No. I295-1.

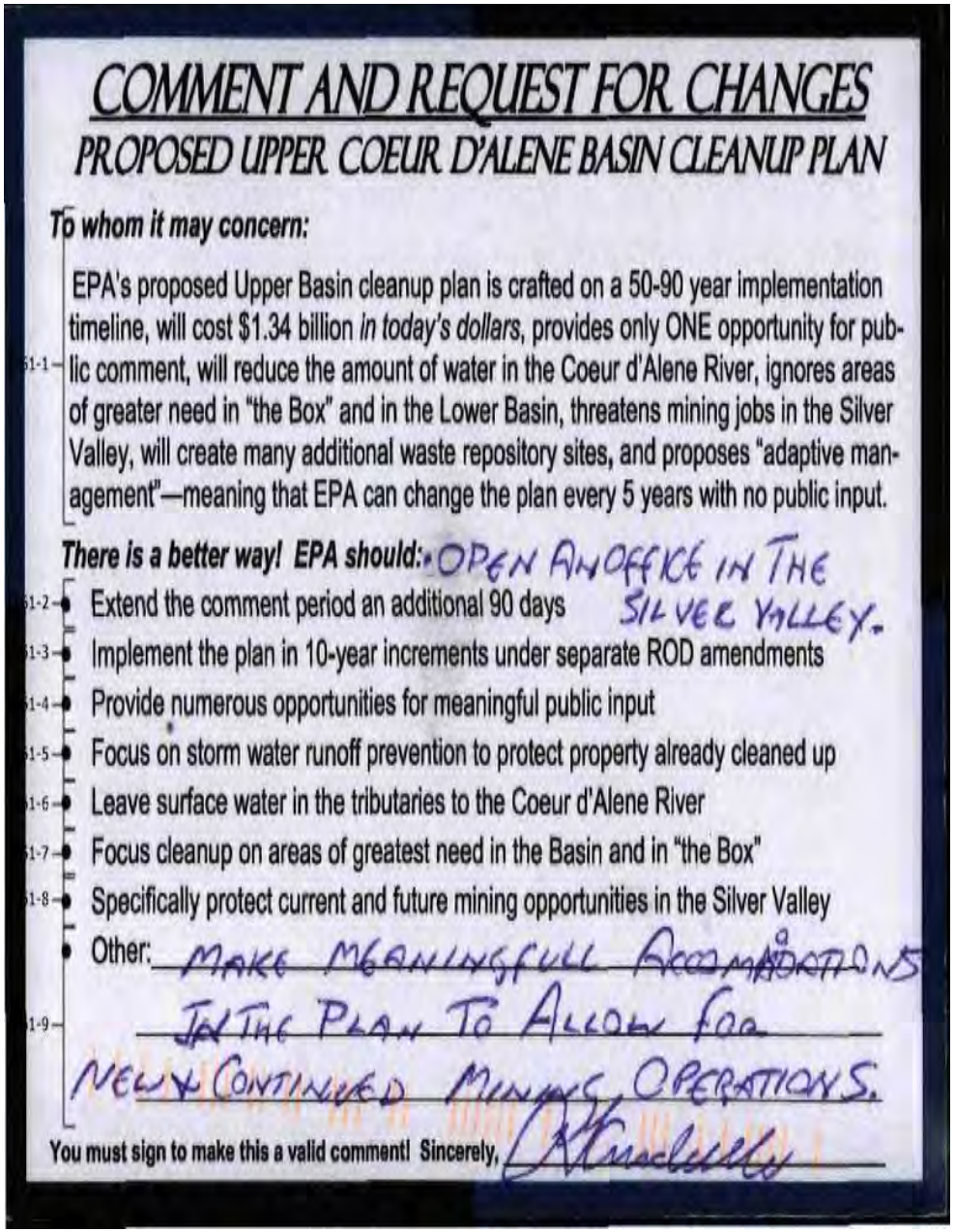
Response to comment I344-2

See response to Comment No. I295-2.

Response to comment I344-3

See response to Comment No. I295-3.

Gaudielle, A.J., I161, Letter 1357297



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I161-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should: OPEN AN OFFICE IN THE SILVER VALLEY.

- I161-2 Extend the comment period an additional 90 days
- I161-3 Implement the plan in 10-year increments under separate ROD amendments
- I161-4 Provide numerous opportunities for meaningful public input
- I161-5 Focus on storm water runoff prevention to protect property already cleaned up
- I161-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I161-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I161-8 Specifically protect current and future mining opportunities in the Silver Valley
- I161-9 Other: MAKE MEANINGFULL ACCOMMODATIONS IN THE PLAN TO ALLOW FOR NEW & CONTINUED MINING OPERATIONS.

You must sign to make this a valid comment! Sincerely, [signature]

Response to comment I161-1
See response to Comment No. I25-1.

Response to comment I161-2
See response to Comment No. I25-2.

Response to comment I161-3
See response to Comment No. I25-3.

Response to comment I161-4
See response to Comment No. I25-4.

Response to comment I161-5
See response to Comment No. I25-5.

Response to comment I161-6
See response to Comment No. I25-6.

Response to comment I161-7
See response to Comment No. I25-7.

Response to comment I161-8
See response to Comment No. I25-8.

Response to comment I161-9
See response to Comment No. I58-5.

Gaudielle, Andy, I377, Letter 616266

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

a.j.gaudielle@att.net to: formsubmission 11/10/2010 06:40 AM
Sent by: A.J.Gaudielle@Att.Net <a.j.gaudielle=att.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Andy Gaudielle
Date: 11/10/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

My biggest concern is that the ROD will have significant impact on the future of responsible mining in the Silver Valley.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: a.j.gaudielle@att.net
Mailing Address: Andy Gaudielle, 2866 N. White Pines Drive|Coeur D Alene|Idaho|83815|US
Phone Number: (208) 667-3073

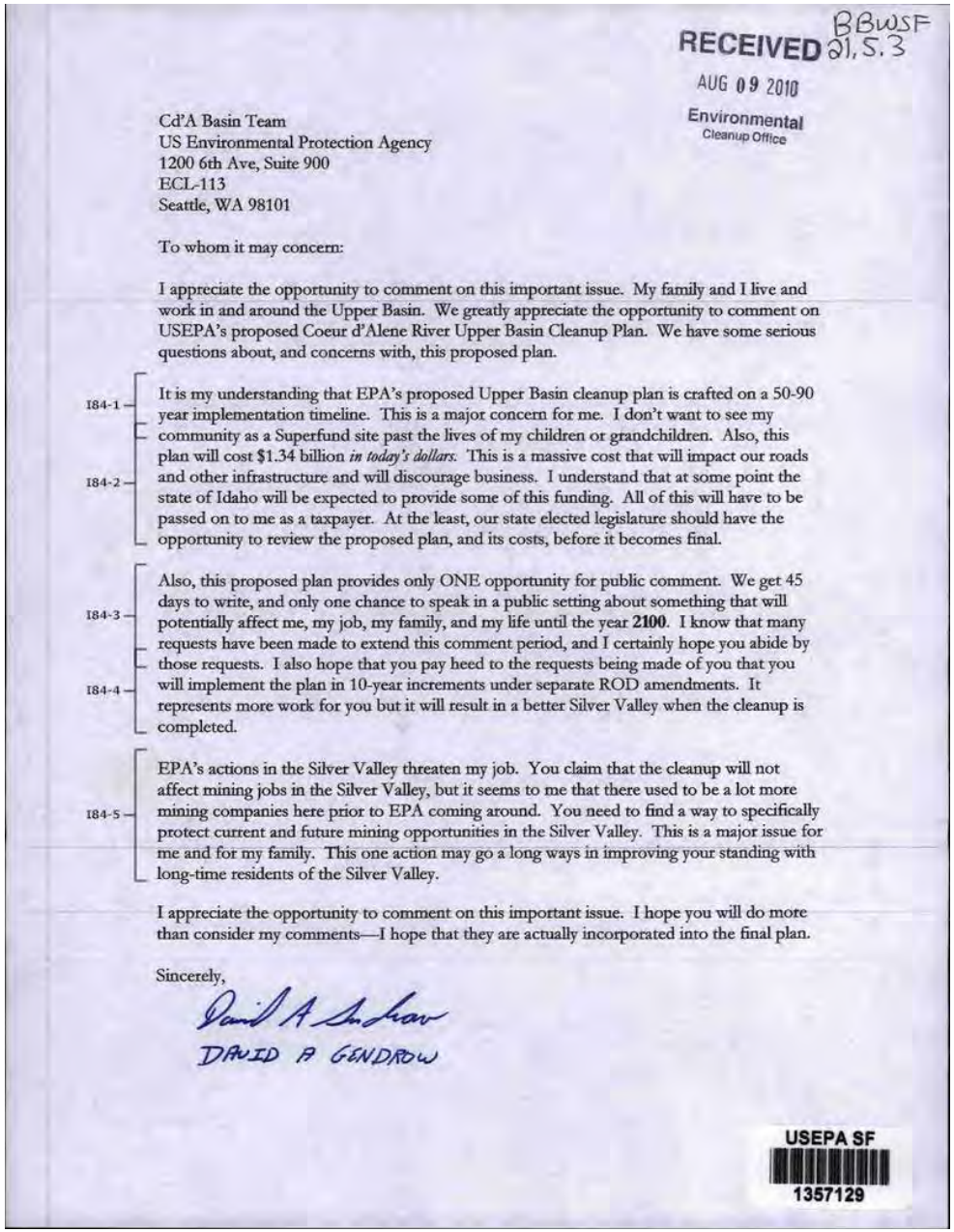
I377-1

616266

Response to comment I377-1

See response to Comment No. I351-1.

Gendrow, David, I84, Letter 1357129



BBWSF 21.5.3

RECEIVED
AUG 09 2010
Environmental Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I84-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars.* This is a massive cost that will impact our roads
I84-2 — and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I84-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I84-4 — will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I84-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

David A Gendrow

DAVID A GENDROW

USEPA SF
1357129

Response to comment I84-1
See response to Comment No. I58-1.

Response to comment I84-2
See response to Comment No. I58-2.

Response to comment I84-3
See response to Comment No. I58-3.

Response to comment I84-4
See response to Comment No. I58-4.

Response to comment I84-5
See response to Comment No. I58-5.

Gentry, Dean, I315, Letter 614445

Page 1 of 1

EPA's Proposed Cleanup
Gentry
to:
CDABasin
11/01/2010 08:51 AM
Cc:
"Dick Harwood"
Show Details

I315-1 Of the total $ 1.34 billion please give me a breakdown of the source of the funds. Such as, settlement funds, EPA tax dollars, State funds, and - - - - .

I315-2 Why is the proposed plan so controversial? Why is there so much opposition to the plan? Is the EPA listening to the Silver Valley folkes and their objections?

I315-3 The EPA states the settlement funds may be used only for the Coeur d'Alene Basin cleanup. How about crediting the entities who have funded the cleanup to this point with those settlement funds? How about maintaining a trust fund for monitoring as needed and for future damage to those areas which have been cleaned up caused by acts of God.

Dean C. Gentry

P O Box 321
St.Maries, Idaho 83861

dgg@smgazette.com

614445

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web9994.h... 11/5/2010

Response to comment I315-1

See responses to Comment Nos. I58-2 and I295-3.

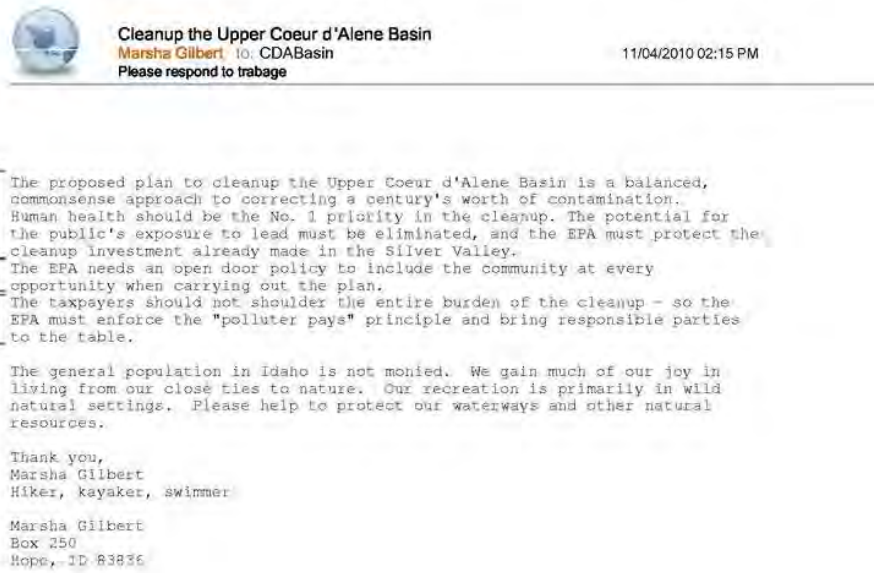
Response to comment I315-2

EPA is listening. EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. EPA is committed to working with the mining industry and Silver Valley businesses and landowners to conduct the cleanup in ways that are consistent with the current and future land uses desired by the community. See Response to Comment No. I295-2.

Response to comment I315-3

EPA believes that monies it has recovered should be applied to cleanup within the Site. EPA has not recovered in excess of any potentially responsible party's fair or actual share of responsibility and see no reason to return settlement recoveries to any potentially responsible party who has resolved its liability to the United States. While natural events have contributed to the fate and transport of contamination within the Site, these events were not solely responsible for the spreading of contamination. For example, the environmental degradation caused by early floods was greatly influenced by historical mining practices, such as direct discharge of tailing into the river system and the construction of plank dams. See response to Comment No. I527-1.

Gilbert, Marsha, I316, Letter 614446



Cleanup the Upper Coeur d'Alene Basin
Marsha Gilbert to: CDABasin 11/04/2010 02:15 PM
Please respond to trabage

I316-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I316-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I316-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

The general population in Idaho is not monied. We gain much of our joy in living from our close ties to nature. Our recreation is primarily in wild natural settings. Please help to protect our waterways and other natural resources.

Thank you,
Marsha Gilbert
Hiker, kayaker, swimmer

Marsha Gilbert
Box 250
Hope, ID 83836

614446

Response to comment I316-1

See response to Comment No. I295-1.

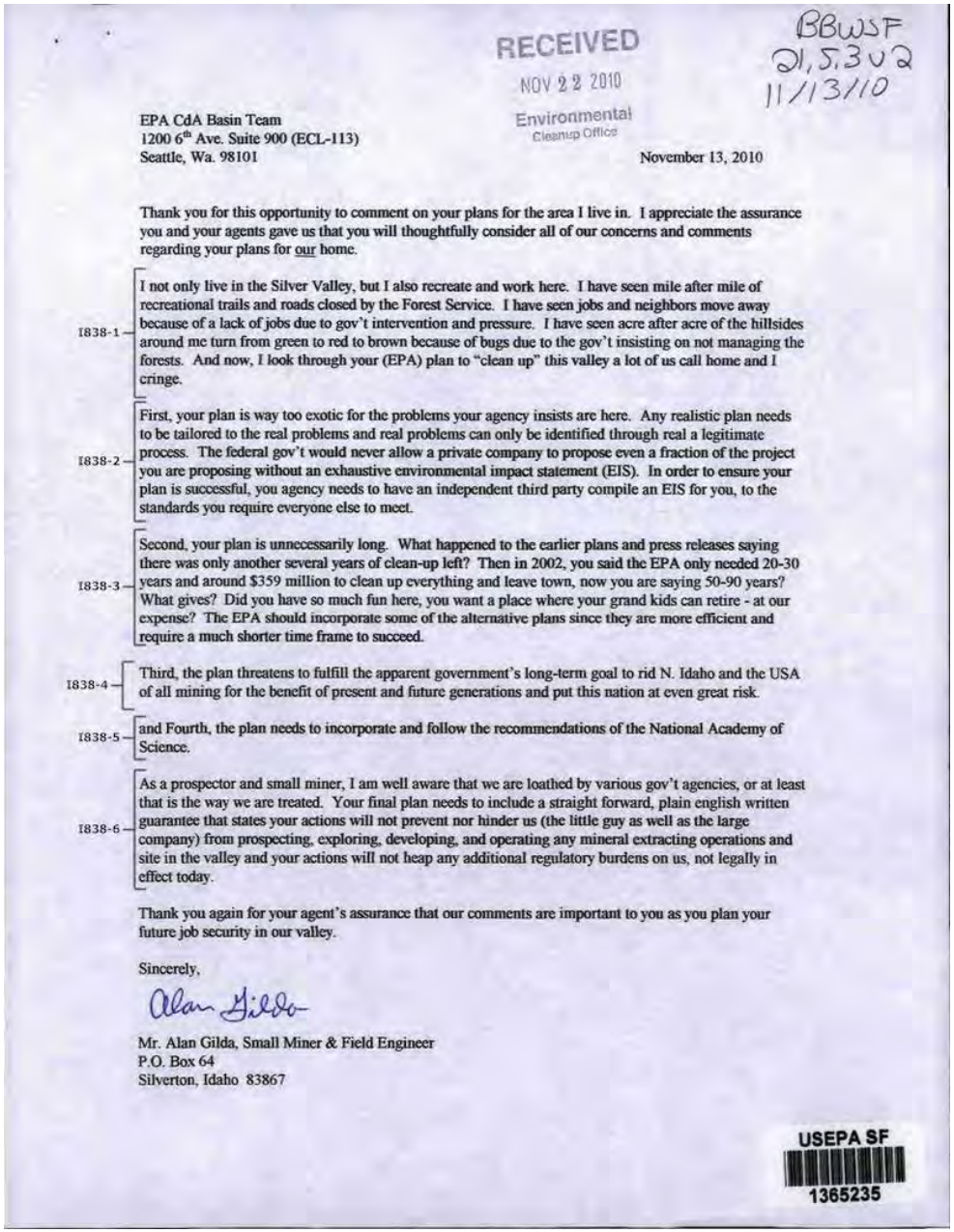
Response to comment I316-2

See response to Comment No. I295-2.

Response to comment I316-3

See response to Comment No. I295-3.

Gilda, Alan, I838, Letter 1365235



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NOV 22 2010
Environmental
Cleanup Office

BBWSF
21,5,3 v 2
11/13/10

EPA CdA Basin Team
1200 6th Ave. Suite 900 (ECL-113)
Seattle, Wa. 98101

November 13, 2010

Thank you for this opportunity to comment on your plans for the area I live in. I appreciate the assurance you and your agents gave us that you will thoughtfully consider all of our concerns and comments regarding your plans for our home.

I838-1 I not only live in the Silver Valley, but I also recreate and work here. I have seen mile after mile of recreational trails and roads closed by the Forest Service. I have seen jobs and neighbors move away because of a lack of jobs due to gov't intervention and pressure. I have seen acre after acre of the hillsides around me turn from green to red to brown because of bugs due to the gov't insisting on not managing the forests. And now, I look through your (EPA) plan to "clean up" this valley a lot of us call home and I cringe.

I838-2 First, your plan is way too exotic for the problems your agency insists are here. Any realistic plan needs to be tailored to the real problems and real problems can only be identified through real a legitimate process. The federal gov't would never allow a private company to propose even a fraction of the project you are proposing without an exhaustive environmental impact statement (EIS). In order to ensure your plan is successful, you agency needs to have an independent third party compile an EIS for you, to the standards you require everyone else to meet.

I838-3 Second, your plan is unnecessarily long. What happened to the earlier plans and press releases saying there was only another several years of clean-up left? Then in 2002, you said the EPA only needed 20-30 years and around $359 million to clean up everything and leave town, now you are saying 50-90 years? What gives? Did you have so much fun here, you want a place where your grand kids can retire - at our expense? The EPA should incorporate some of the alternative plans since they are more efficient and require a much shorter time frame to succeed.

I838-4 Third, the plan threatens to fulfill the apparent government's long-term goal to rid N. Idaho and the USA of all mining for the benefit of present and future generations and put this nation at even great risk.

I838-5 and Fourth, the plan needs to incorporate and follow the recommendations of the National Academy of Science.

I838-6 As a prospector and small miner, I am well aware that we are loathed by various gov't agencies, or at least that is the way we are treated. Your final plan needs to include a straight forward, plain english written guarantee that states your actions will not prevent nor hinder us (the little guy as well as the large company) from prospecting, exploring, developing, and operating any mineral extracting operations and site in the valley and your actions will not heap any additional regulatory burdens on us, not legally in effect today.

Thank you again for your agent's assurance that our comments are important to you as you plan your future job security in our valley.

Sincerely,

Alan Gilda

Mr. Alan Gilda, Small Miner & Field Engineer
P.O. Box 64
Silverton, Idaho 83867

USEPA SF
1365235

Response to comment I838-1
Comment noted.

Response to comment I838-2
The comment raises issues regarding whether EPA satisfied National Environmental Policy Act (NEPA) requirements. For CERCLA response actions, EPA is exempted from the procedural requirements of environmental laws, including NEPA. CERCLA Section 121 (d)(2)(A) addresses the applicability of other environmental laws through applicable or relevant and appropriate requirements (ARARs). The National Oil and Hazardous Substances Pollution Contingency Plan interprets this to require compliance only with substantive, not procedural, aspects of ARARs. Because NEPA requirements are procedural, NEPA is not an ARAR for CERCLA response actions. EPA procedures or environmental reviews under CERCLA enabling legislation are functionally equivalent to the NEPA process and thus, exempt from the procedural requirements in NEPA. CERCLA addresses the two basic objectives of NEPA: (1) the agency should consider significant environmental impacts of the proposed action, and (2) relevant environmental information should be made available to the public, which allows the public to play a role in the agency's decision-making process and implementation of the decision. The administrative record EPA developed in support of the Selected Remedy documents that EPA, by following the requirements of the NCP, conducted a remedy selection process that was the functional equivalent of NEPA.

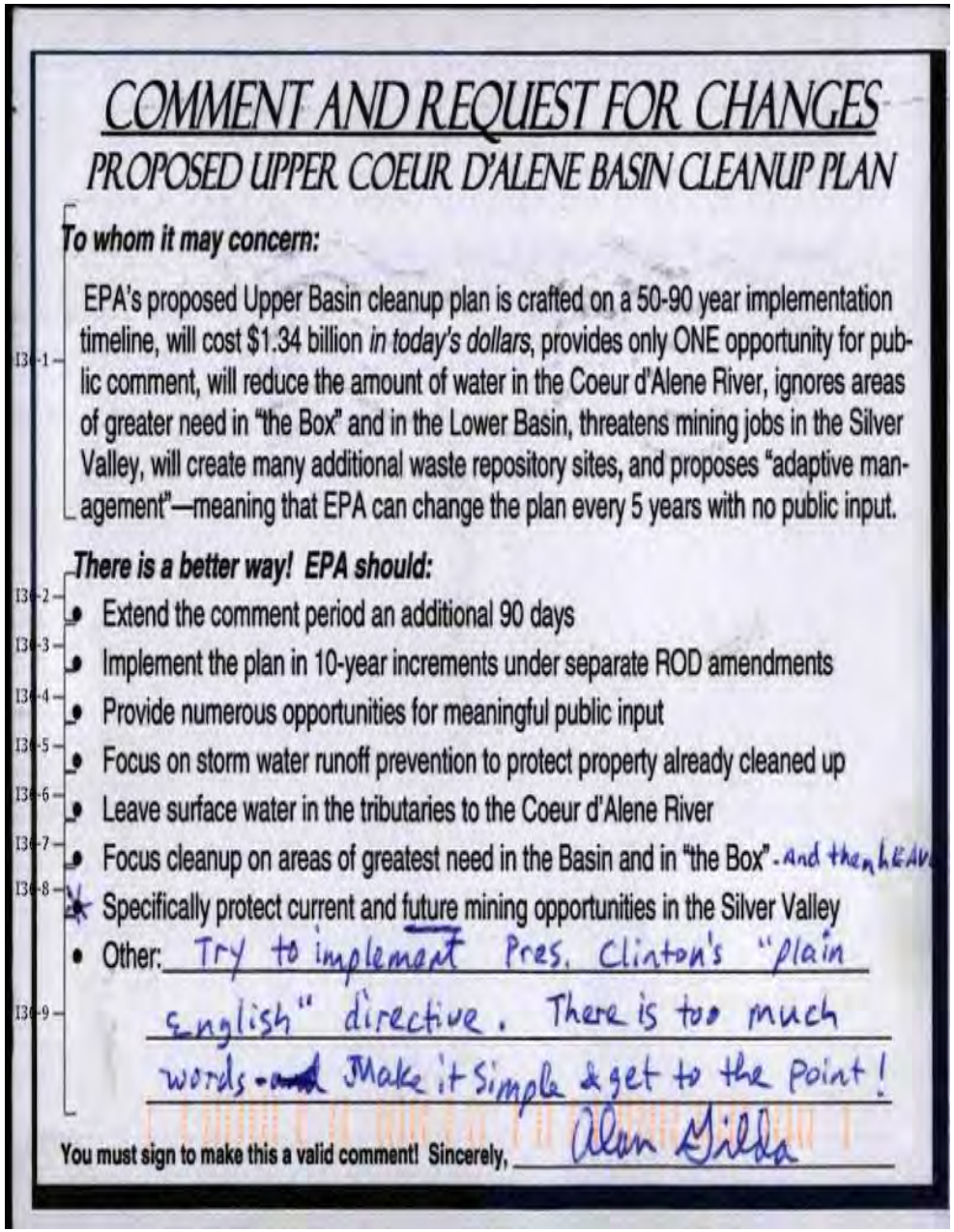
Response to comment I838-3
See response to Comment No. I58-1.

Response to comment I838-4
See response to Comment No. I58-5.

Response to comment I838-5
See response to Comment No. LJ27-8.

Response to comment I838-6
See response to Comment No. I58-5.

Gilda, Alan, I36, Letter 1357080



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I36-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I36-2 Extend the comment period an additional 90 days
- I36-3 Implement the plan in 10-year increments under separate ROD amendments
- I36-4 Provide numerous opportunities for meaningful public input
- I36-5 Focus on storm water runoff prevention to protect property already cleaned up
- I36-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I36-7 Focus cleanup on areas of greatest need in the Basin and in "the Box". And then LEAV
- I36-8 ★ Specifically protect current and future mining opportunities in the Silver Valley
- Other: Try to implement Pres. Clinton's "plain English" directive. There is too much words and Make it Simple & get to the Point!

I36-9

You must sign to make this a valid comment! Sincerely, Alan Gilda

Response to comment I36-1
See response to Comment No. I25-1.

Response to comment I36-2
See response to Comment No. I25-2.

Response to comment I36-3
See response to Comment No. I25-3.

Response to comment I36-4
See response to Comment No. I25-4.

Response to comment I36-5
See response to Comment No. I25-5.

Response to comment I36-6
See response to Comment No. I25-6.

Response to comment I36-7
See response to Comment No. I25-7.

Response to comment I36-8
See response to Comment No. I25-8.

Response to comment I36-9
Comment noted.

Gillerman, Virginia S., I775, Letter 618776

Comments for Nov. 23 deadline on Proposed Cleanup plan for Upper Coeur d'Alene Basin in Idaho
cmp10d83 to: CDABasin 11/23/2010 02:01 PM
Cc: vgillerm

Dear EPA,

I775-1 I would like to comment on the "Proposed Plan for the Upper Coeur d'Alene River Basin and Bunker Hill Superfund site," also known as an ROD Amendment. I am submitting these comments as an Idaho citizen concerned about the well-being of the state and its citizens and lands, as an experienced geological professional, and as a researcher in mine lands reclamation with considerable expertise in Idaho, mine waste geochemistry, and science and engineering in general.

I have visited much of the area under question over the past 20 years. I only recently became aware of the plan and the very short time frame for comments. I live in Boise and while the area affected is in northern Idaho, I had not seen any EPA public meetings in Boise, nor public notices on the proposed action. Thus, it seems like many of the state's citizens and government have been kept in the dark on this proposal. Personally, I know the EPA could find some better places (either in US or overseas) to spend $ 1+ billion of taxpayer money -places where the environment really does need cleaning up. Most of the human health effects left in the CDA Basin could probably be taken

I775-2 care of with about $ 100 million and 5 years of effort. Most, probably 95%, were already addressed in the BH Box cleanup. Just because we can analyse water and soils to parts per trillion detection limits does not mean that is the only target limit. Let's be practical. Neither money nor minerals are renewable resources anymore.

Considering that the EPA is not through with current efforts in the Basin, it seems to me that such a huge and expensive expansion of the Superfund cleanup is totally premature. From my observations of the area, I am not convinced that the proposed work is necessary, and indeed things like putting plastic liners in the riverbed seem like a total waste of money. One sharp rock through the plastic and all that money is gone and the predictive modeling is

I775-3 totally disproven. The river banks and vegetation are already recovering nicely. Nature will do more than the EPA can accomplish on water quality. EPA actions to remove and encapsulate tailings and selected waste rock dumps of "contaminated" natural mined rock are important. But other agencies and contractors can usually get the job done quicker and better. Clean-up of selected sites does not cost that much nor take that long. Let BLM/FS or private groups take the lead. Water quality can be adequately addressed by placing wells outside the affected areas and by water treatment plants.

I have not read all the documents in detail, but I have heard that the proposed action ignores the good science and conclusions from the National Academy of Sciences review. Why? Do EPA personnel value their jobs over the next 100 years more than good science and data? What about jobs for residents in the Silver Valley and the mining industry? This amendment to the ROD will make it more difficult for mining, tourism, and other industries to exist in the region.

I775-4 I challenge EPA to withdraw their overly ambitious proposal and to sit down with all the data (including NAS study) and parties involved, including State of Idaho and Valley residents, and to reformulate the clean-up proposal into a

618776

Response to comment I775-1

See responses to Comment Nos. I295-2 and LJ39-5.

Response to comment I775-2

See responses to Comment Nos. I58-1 and LJ39-5.

Response to comment I775-3

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. Cleanup of Upper Basin areas will also greatly reduce the amount of lead being transported down the Coeur d'Alene River and settling in Lower Basin areas and Coeur d'Alene Lake, posing potential risks to human health. Cleanup of Upper Basin areas will also reduce the risk of future recontamination of remediated Lower Basin areas, thereby minimizing the need for follow up cleanup work in those areas. The plastic liners mentioned in the comment will provide hydraulic isolation to isolate contaminated waters from clean waters (i.e., keep clean water clean). The liners will be installed with bedding material beneath and on top of the liner to prevent damage to the liner. Over time, the liners will need repair and replacement and costs for that upkeep are included in the cost estimates for the Selected Remedy. The comment suggests collection of contaminated groundwater in wells and treatment at treatment plants. Treatment at the Central Treatment Plant in Kellogg is essentially what is included in the Selected Remedy for areas of significant groundwater contamination. Similarly, contaminated adit discharges will be collected and treated.

Response to comment I775-4

EPA carefully considered the NAS report and its recommendations. Furthermore, EPA collected additional data and conducted studies to address some of the key NAS recommendations. The results of those efforts are reflected in the Upper Basin Selected Remedy. Also see the ROD Amendment, Part 3, Section 3.5.2. Regarding jobs and the mining industry, see responses to Comment Nos. I54-2 and I58-5. Regarding EPA's interaction with the community and others in developing the Selected Remedy, see response to Comment No. I295-2.

I775-4

time and money-limited plan which addresses the major areas that do need remediation, such as Canyon and Ninemile Creeks, in a cost efficient manner in a ten year or less time frame. No one needs the gold-plated, "EPA jobs forever" version which the proposed action is. Idaho and the country simply can not afford the plan proposed.

Respectfully,

Virginia S. Gillerman, Ph.D.
Economic Geologist
2974 E. Hard Rock Dr.
Boise, Idaho 83712
virginia.gillerman@frontier.com

(also a geologist with the Idaho Geological Survey, Boise Office, for 20 years)
Comment is from myself, not my agency position. The IGS is neutral but in favor of good science.

No comments

Gillespie, Clyde, I629, Letter 617813

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
cdgillesp@msn.com to: formsubmission 11/17/2010 11:23 PM
Sent by: Cdgillesp@Msn.Com <cdgillesp=msn.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Clyde Gillespie
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: cdgillesp@msn.com
Mailing Address: PO Box 34565|Juneau|AK|99803|US
Phone Number: (907) 500-7911

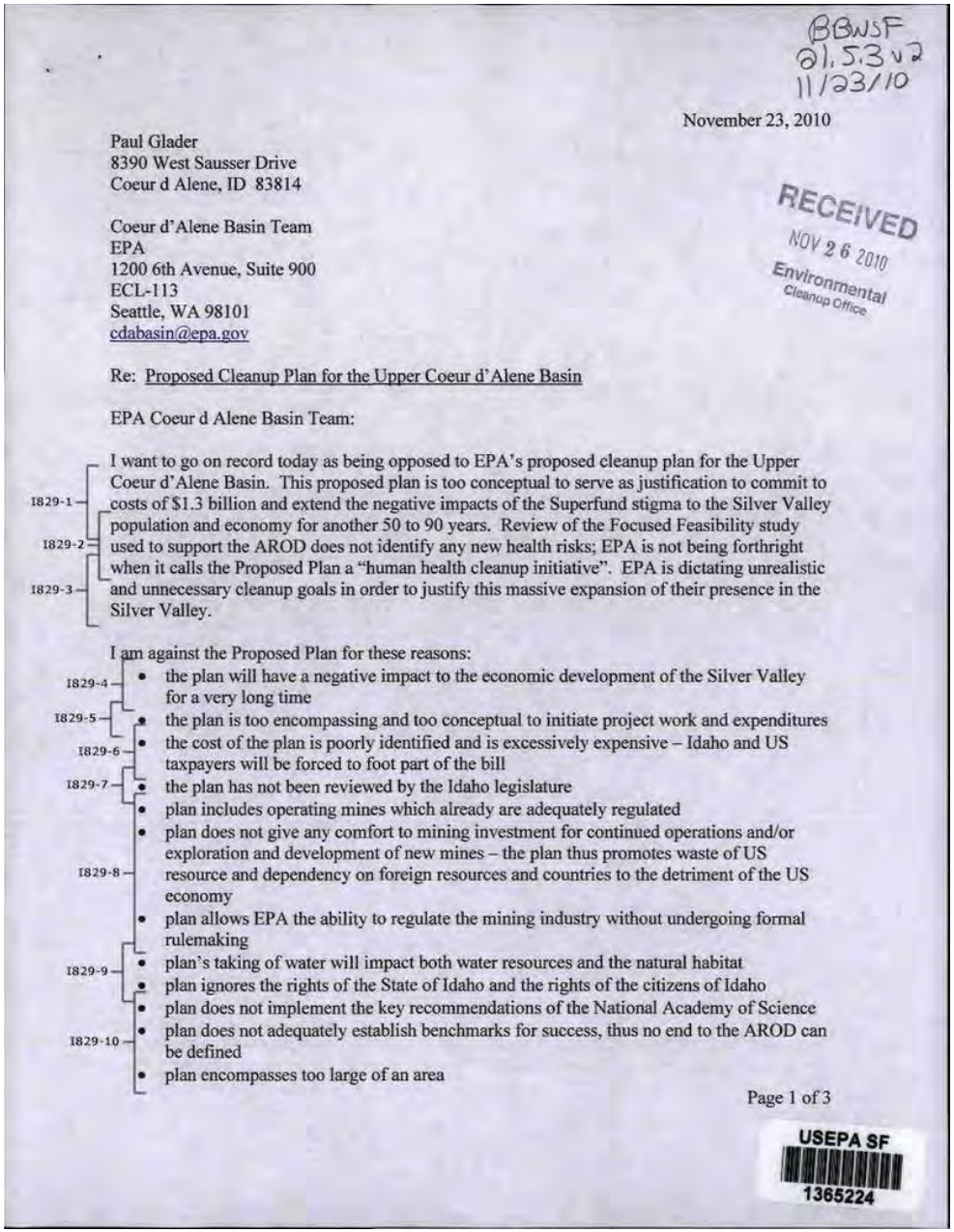
1629-1

617813

Response to comment I629-1

See response to Comment No. I351-1.

Glader, Paul L., I829, Letter 1365224



BBWSF
01.5.3 v2
11/23/10

November 23, 2010

Paul Glader
8390 West Sausser Drive
Coeur d Alene, ID 83814

RECEIVED
NOV 26 2010
Environmental
Cleanup Office

Coeur d'Alene Basin Team
EPA
1200 6th Avenue, Suite 900
ECL-113
Seattle, WA 98101
cdabasin@epa.gov

Re: Proposed Cleanup Plan for the Upper Coeur d'Alene Basin

EPA Coeur d Alene Basin Team:

I829-1 I829-2 I829-3 I want to go on record today as being opposed to EPA's proposed cleanup plan for the Upper Coeur d'Alene Basin. This proposed plan is too conceptual to serve as justification to commit to costs of $1.3 billion and extend the negative impacts of the Superfund stigma to the Silver Valley population and economy for another 50 to 90 years. Review of the Focused Feasibility study used to support the AROD does not identify any new health risks; EPA is not being forthright when it calls the Proposed Plan a "human health cleanup initiative". EPA is dictating unrealistic and unnecessary cleanup goals in order to justify this massive expansion of their presence in the Silver Valley.

I am against the Proposed Plan for these reasons:

- I829-4 the plan will have a negative impact to the economic development of the Silver Valley for a very long time
- I829-5 the plan is too encompassing and too conceptual to initiate project work and expenditures
- I829-6 the cost of the plan is poorly identified and is excessively expensive – Idaho and US taxpayers will be forced to foot part of the bill
- I829-7 the plan has not been reviewed by the Idaho legislature
- plan includes operating mines which already are adequately regulated
- plan does not give any comfort to mining investment for continued operations and/or exploration and development of new mines – the plan thus promotes waste of US
- I829-8 resource and dependency on foreign resources and countries to the detriment of the US economy
- plan allows EPA the ability to regulate the mining industry without undergoing formal rulemaking
- I829-9 plan's taking of water will impact both water resources and the natural habitat
- plan ignores the rights of the State of Idaho and the rights of the citizens of Idaho
- plan does not implement the key recommendations of the National Academy of Science
- I829-10 plan does not adequately establish benchmarks for success, thus no end to the AROD can be defined
- plan encompasses too large of an area

Page 1 of 3

USEPA SF
1365224

Response to comment I829-1
See responses to Comment Nos. I58-2 and I58-4.

Response to comment I829-2
Cleanup actions that address mine waste contamination within drainage areas accessible for recreational use will protect human health and improve surface water quality. Common recreational activities in the Coeur d'Alene Basin include hiking, fishing, hunting, boating, swimming, and all-terrain-vehicle riding. The Selected Remedy will provide clean surface soil in contaminated areas and reduce particulate lead loading to surface water. In these ways, the Selected Remedy will further reduce the risks people may be exposed to during recreational activities. Also see response to Comment No. I295-1.

Response to comment I829-3
EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Response to comment I829-4
See response to Comment No. I54-2.

Response to comment I829-5
The ROD Amendment selects a remedy consistent with CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan. EPA will use an adaptive management process to monitor the performance of cleanup actions and will make adjustments to future actions to benefit from the information gained. Adaptive management does not mean that EPA can change the Selected Remedy without meaningful public participation. In fact, if EPA decides in the future that significant or fundamental changes to the remedy are needed, EPA is legally required to document changes to the Selected Remedy in an Explanation of Significant Differences or another ROD Amendment. Also see response to Comment No. I58-1.

Response to comment I829-6
See response to Comment No. I58-2.

Response to comment I829-7

See response to Comment No. LJ39-5.

Response to comment I829-8

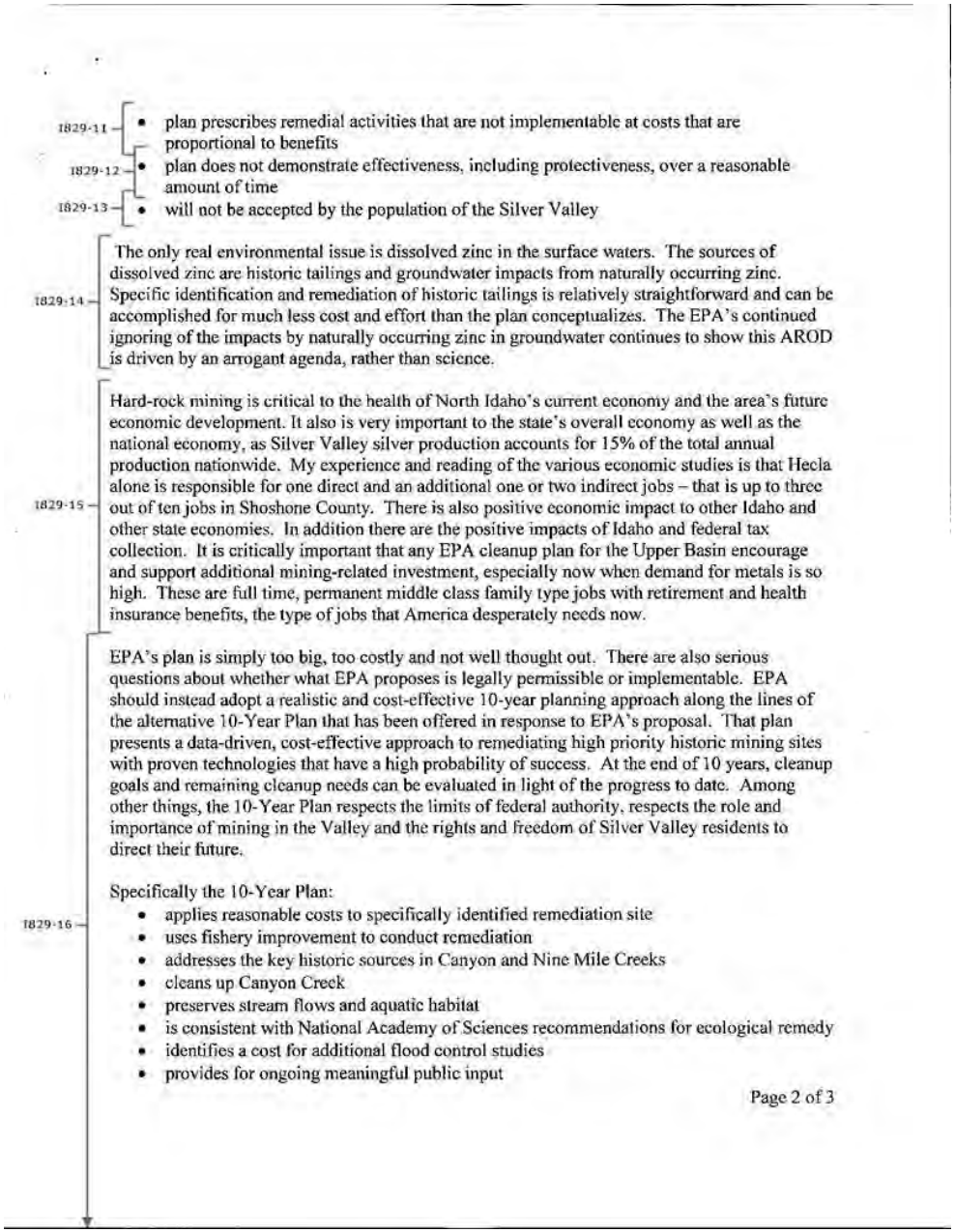
See response to Comment No. I58-5.

Response to comment I829-9

See responses to Comment Nos. SA4-12 and LJ39-5 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I829-10

See responses to Comment Nos. LJ27-8, I58-1 and I822-14.



I829-11 • plan prescribes remedial activities that are not implementable at costs that are proportional to benefits

I829-12 • plan does not demonstrate effectiveness, including protectiveness, over a reasonable amount of time

I829-13 • will not be accepted by the population of the Silver Valley

I829-14 The only real environmental issue is dissolved zinc in the surface waters. The sources of dissolved zinc are historic tailings and groundwater impacts from naturally occurring zinc. Specific identification and remediation of historic tailings is relatively straightforward and can be accomplished for much less cost and effort than the plan conceptualizes. The EPA's continued ignoring of the impacts by naturally occurring zinc in groundwater continues to show this AROD is driven by an arrogant agenda, rather than science.

I829-15 Hard-rock mining is critical to the health of North Idaho's current economy and the area's future economic development. It also is very important to the state's overall economy as well as the national economy, as Silver Valley silver production accounts for 15% of the total annual production nationwide. My experience and reading of the various economic studies is that Hecla alone is responsible for one direct and an additional one or two indirect jobs – that is up to three out of ten jobs in Shoshone County. There is also positive economic impact to other Idaho and other state economies. In addition there are the positive impacts of Idaho and federal tax collection. It is critically important that any EPA cleanup plan for the Upper Basin encourage and support additional mining-related investment, especially now when demand for metals is so high. These are full time, permanent middle class family type jobs with retirement and health insurance benefits, the type of jobs that America desperately needs now.

EPA's plan is simply too big, too costly and not well thought out. There are also serious questions about whether what EPA proposes is legally permissible or implementable. EPA should instead adopt a realistic and cost-effective 10-year planning approach along the lines of the alternative 10-Year Plan that has been offered in response to EPA's proposal. That plan presents a data-driven, cost-effective approach to remediating high priority historic mining sites with proven technologies that have a high probability of success. At the end of 10 years, cleanup goals and remaining cleanup needs can be evaluated in light of the progress to date. Among other things, the 10-Year Plan respects the limits of federal authority, respects the role and importance of mining in the Valley and the rights and freedom of Silver Valley residents to direct their future.

Specifically the 10-Year Plan:

I829-16
- applies reasonable costs to specifically identified remediation site
- uses fishery improvement to conduct remediation
- addresses the key historic sources in Canyon and Nine Mile Creeks
- cleans up Canyon Creek
- preserves stream flows and aquatic habitat
- is consistent with National Academy of Sciences recommendations for ecological remedy
- identifies a cost for additional flood control studies
- provides for ongoing meaningful public input

Page 2 of 3

Response to comment I829-11
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I829-12
EPA selected an interim remedy for the Upper Basin its remedy in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan. As noted in the ROD Amendment, Part 2, Section 12.0, EPA did not select a final remedy. In response to public comments, EPA reduced the scope of the Preferred Alternative as identified in the Proposed Plan, and did not include all of the remedial actions that were identified in its Preferred Alternative. Therefore, the Selected Remedy is not intended to fully address surface water contamination in all locations in the Upper Basin. Nor is it intended to fully address groundwater contamination. Thus, the Selected Remedy is an interim remedy for the Upper Basin. However, the Selected Remedy will address many significant sources of contamination in the Upper Basin and will be protective of human health and the environment within the context of its scope.

Response to comment I829-13
Comment noted.

Response to comment I829-14
See response to Comment No. LC33-8.

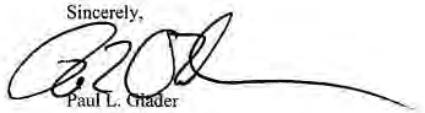
Response to comment I829-15
See response to Comment No. I58-5.

Response to comment I829-16
See response to Comment No. I474-2.

1829-16

The phased 10-year plan is a much more reasoned approach than the EPA's Proposed Plan and is both more protective and cost-effective at addressing the critical sources of contamination within a manageable time frame.

Sincerely,



Paul L. Glader

Page 3 of 3

No comments

Glass, Rachel, I630, Letter 618237

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
bigbearbuds@msn.com to: formsubmission 11/18/2010 07:10 PM
Sent by: Bigbearbuds@Msn.Com <bigbearbuds=msn.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Rachel Glass
Date: 04/01/1980
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. Don't waste our tax dollars and hurt our economy with this ridiculous plan. The country has more pressing needs than this. The human health risk is already being addressed in more sensible ways. This plan will do more harm than good for the Silver Valley. This plan is flawed for a number of reasons. The state of Idaho should be in charge of overseeing this project. We need state rights to be implemented here and not big government overstepping its bounds. We need to stick to the facts and get rid of the negative distortions with the EPAs plan.
I630-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: bigbearbuds@msn.com
Mailing Address: 808 N 22nd St|Coeur d Alene|Idaho|83814|US
Phone Number:

618237

Response to comment I630-1

See response to Comment No. I351-1.

Goebel, Michele, I379, Letter 616268

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mgoebel@modernmachinery.com to: formsubmission 11/11/2010 08:56 AM
Sent by: Mgoebel@Modernmachinery.Com <mgoebel=modernmachinery.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Michele Goebel
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: mgoebel@modernmachinery.com
Mailing Address: 2555 Garrett Way|Pocatello|ID|83201|US
Phone Number: (208) 241-5791

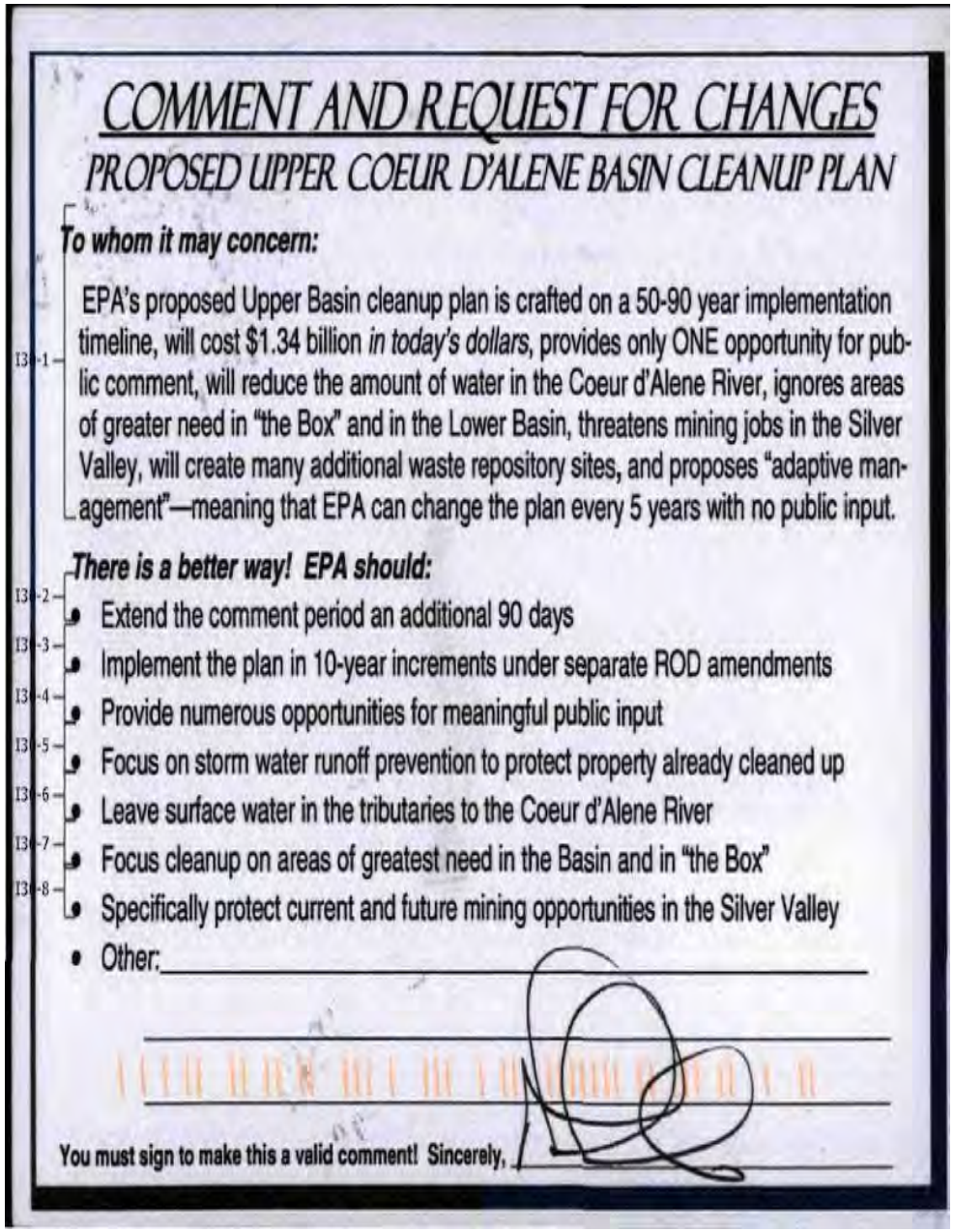
I379-1

616268

Response to comment I379-1

See response to Comment No. I351-1.

Goelle, I30, Letter 1357074



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I30-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I30-2 Extend the comment period an additional 90 days
- I30-3 Implement the plan in 10-year increments under separate ROD amendments
- I30-4 Provide numerous opportunities for meaningful public input
- I30-5 Focus on storm water runoff prevention to protect property already cleaned up
- I30-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I30-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I30-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I30-1
See response to Comment No. I25-1.

Response to comment I30-2
See response to Comment No. I25-2.

Response to comment I30-3
See response to Comment No. I25-3.

Response to comment I30-4
See response to Comment No. I25-4.

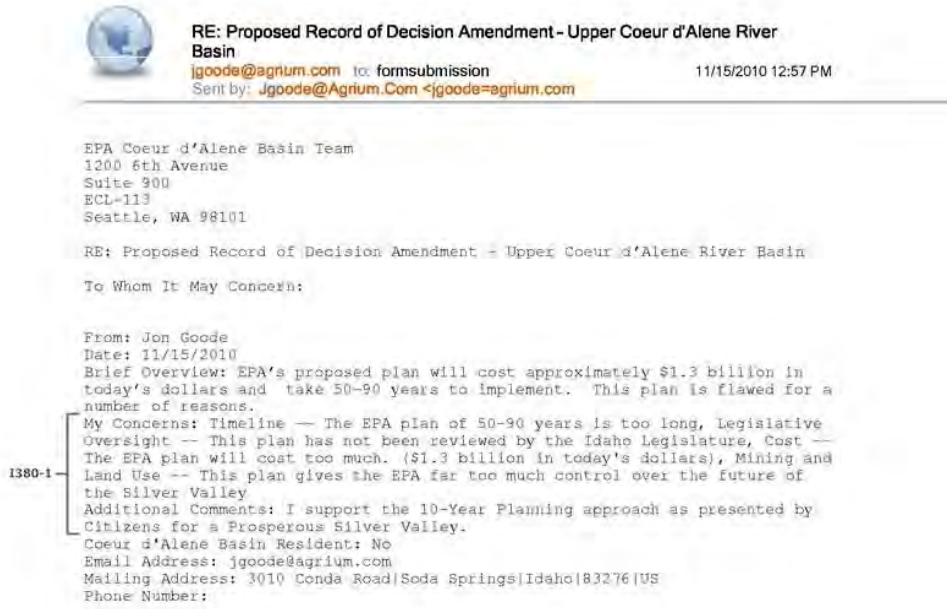
Response to comment I30-5
See response to Comment No. I25-5.

Response to comment I30-6
See response to Comment No. I25-6.

Response to comment I30-7
See response to Comment No. I25-7.

Response to comment I30-8
See response to Comment No. I25-8.

Goode, Jon, I380, Letter 616270



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jgoode@agrium.com to: formsubmission 11/15/2010 12:57 PM
Sent by: Jgoode@Agrium.Com <jgoode=agrium.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Jon Goode
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: jgoode@agrium.com
Mailing Address: 3010 Conda Road|Soda Springs|Idaho|83276|US
Phone Number:

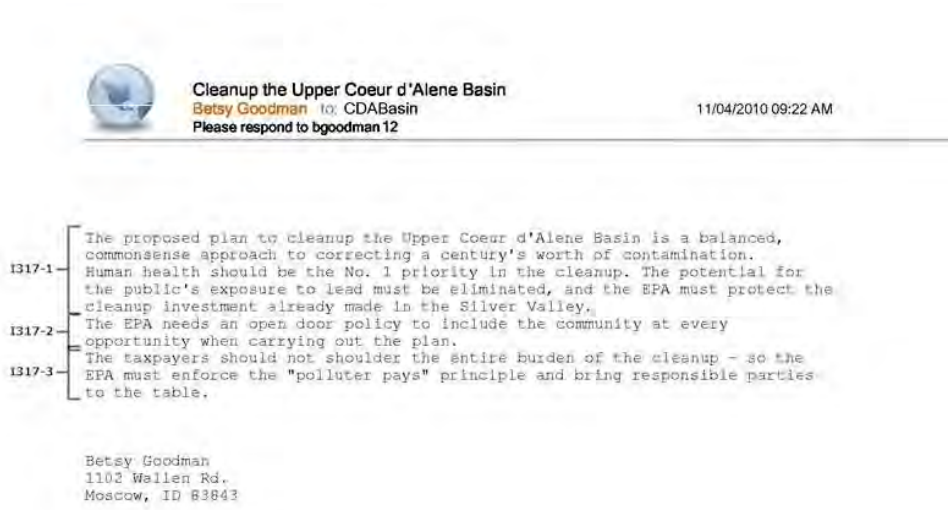
I380-1

616270

Response to comment I380-1

See response to Comment No. I351-1.

Goodman, Betsy, I317, Letter 614447



Cleanup the Upper Coeur d'Alene Basin
Betsy Goodman to: CDABasin 11/04/2010 09:22 AM
Please respond to bgoodman12

I317-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I317-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I317-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Betsy Goodman
1102 Wallen Rd.
Moscow, ID 83843

614447

Response to comment I317-1

See response to Comment No. I295-1.

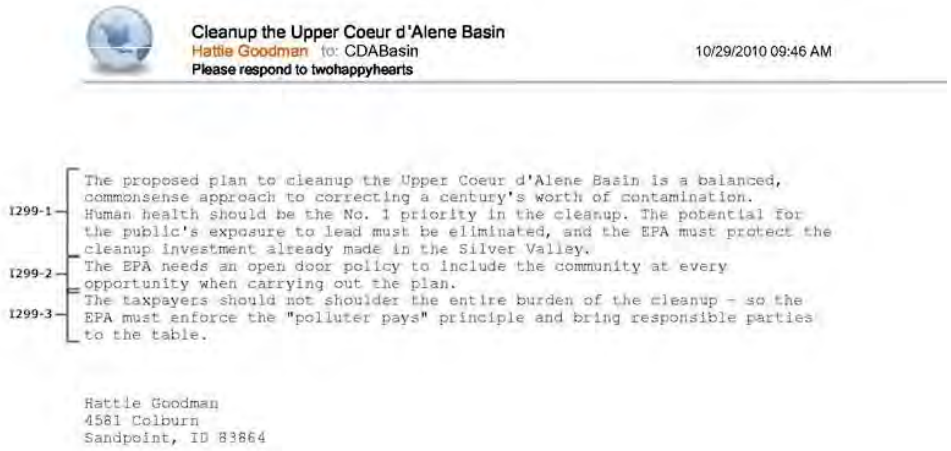
Response to comment I317-2

See response to Comment No. I295-2.

Response to comment I317-3

See response to Comment No. I295-3.

Goodman, Hattie, I299, Letter 614429



Cleanup the Upper Coeur d'Alene Basin
Hattie Goodman to: CDABasin 10/29/2010 09:46 AM
Please respond to twohappyhearts

I299-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I299-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I299-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Hattie Goodman
4581 Colburn
Sandpoint, ID 83864

614429

Response to comment I299-1

See response to Comment No. I295-1.

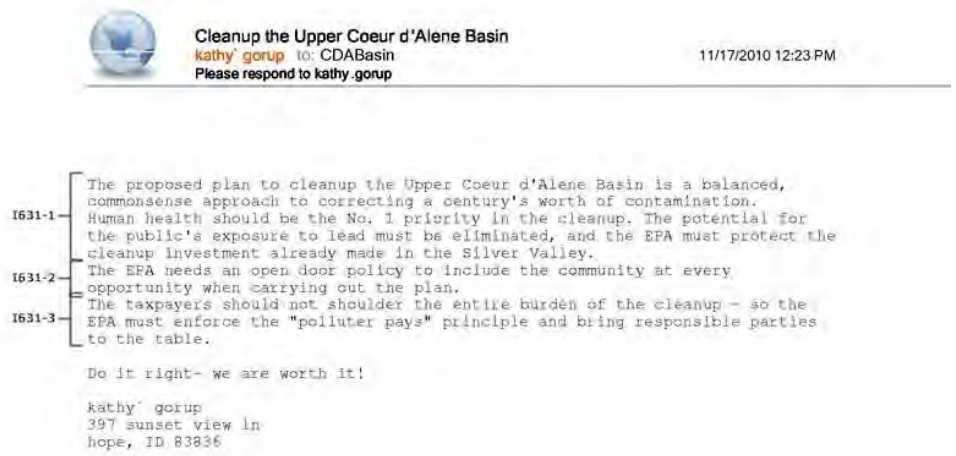
Response to comment I299-2

See response to Comment No. I295-2.

Response to comment I299-3

See response to Comment No. I295-3.

Gorup, Kathy, I631, Letter 618238



Cleanup the Upper Coeur d'Alene Basin
kathy` gorup to: CDABasin 11/17/2010 12:23 PM
Please respond to kathy.gorup

I631-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I631-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I631-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Do it right- we are worth it!

kathy` gorup
397 sunset view ln
hope, ID 83836

618238

Response to comment I631-1

See response to Comment No. I295-1.

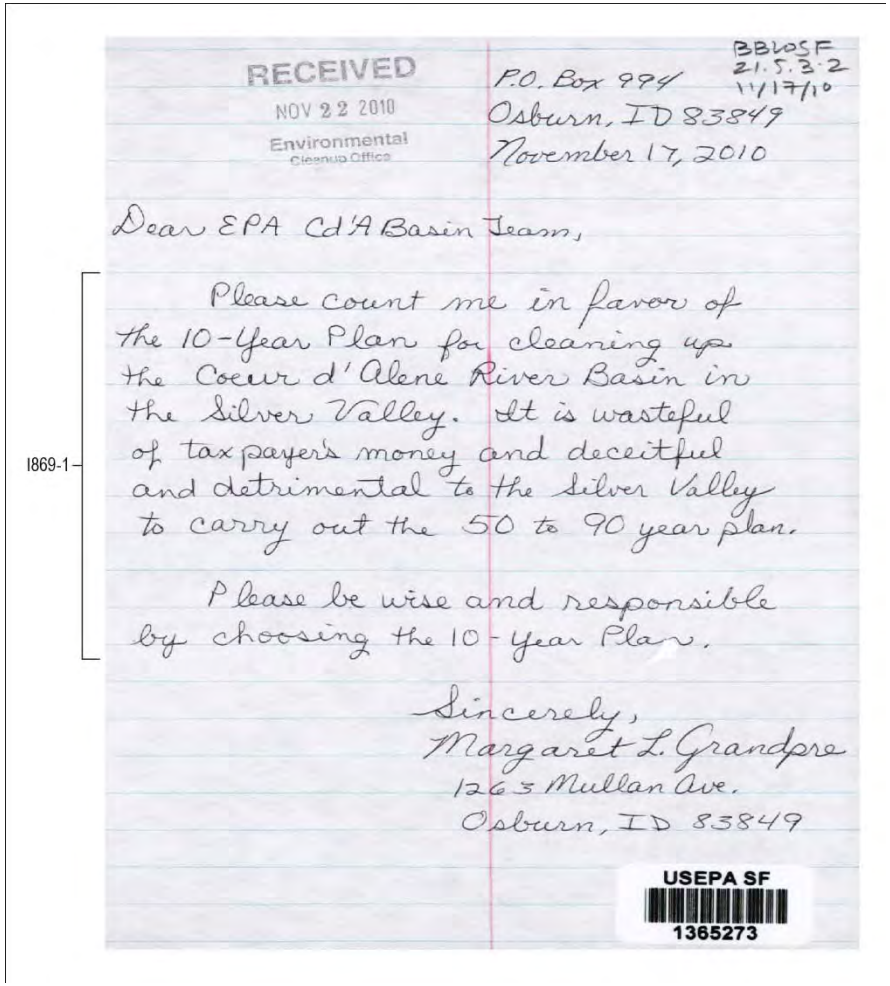
Response to comment I631-2

See response to Comment No. I295-2.

Response to comment I631-3

See response to Comment No. I295-3.

Grandpre, Margaret L., I869, Letter 1365273



BBLOSF
21.5.3.2
11/17/10

RECEIVED
NOV 22 2010
Environmental Cleanup Office

P.O. Box 994
Osburn, ID 83849
November 17, 2010

Dear EPA Cd'A Basin Team,

I869-1 — Please count me in favor of the 10-Year Plan for cleaning up the Coeur d'Alene River Basin in the Silver Valley. It is wasteful of tax payer's money and deceitful and detrimental to the Silver Valley to carry out the 50 to 90 year plan.

Please be wise and responsible by choosing the 10-Year Plan.

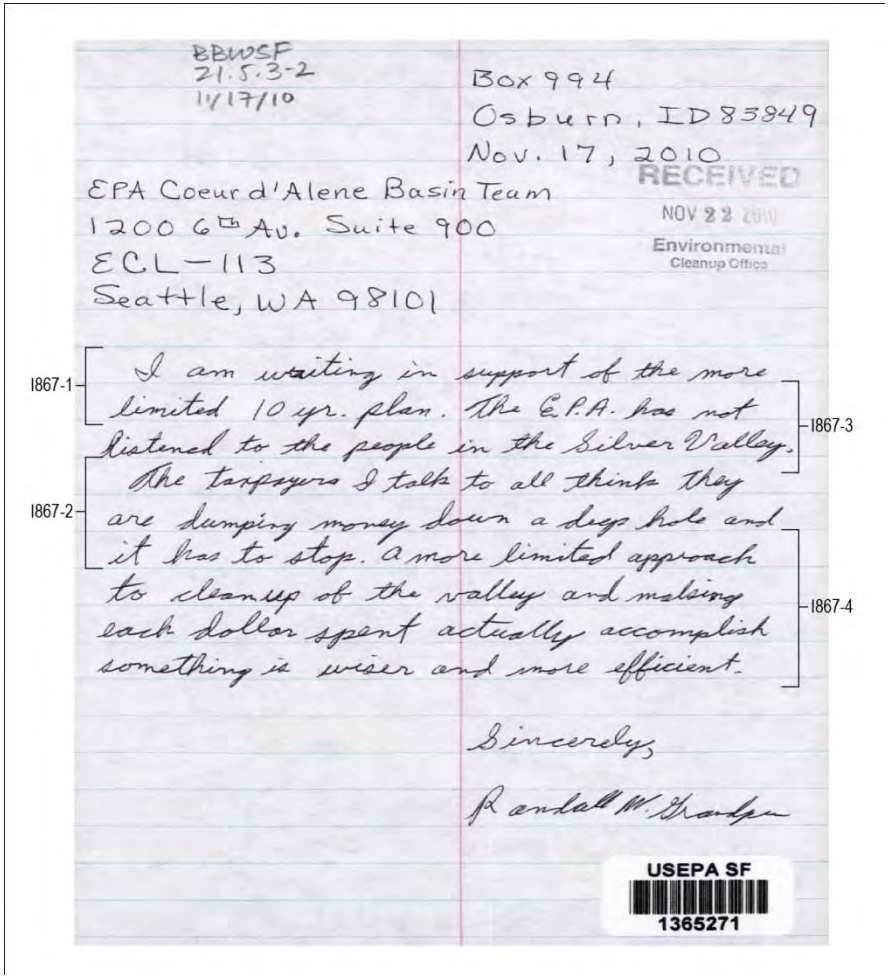
Sincerely,
Margaret L. Grandpre
1263 Mullan Ave.
Osburn, ID 83849

USEPA SF
1365273

Response to comment I869-1

See response to Comment No. I474-2.

Grandpre, Randall W., I867, Letter 1365271



BBWSF
21.5.3-2
11/17/10

Box 994
Osburn, ID 83849
Nov. 17, 2010

RECEIVED
NOV 22 2010
Environmental Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Av. Suite 900
ECL-113
Seattle, WA 98101

I867-1 I am waiting in support of the more limited 10 yr. plan. The E.P.A. has not listened to the people in the Silver Valley. I867-3

I867-2 The taxpayers I talk to all think they are dumping money down a deep hole and it has to stop. a more limited approach to cleanup of the valley and making each dollar spent actually accomplish something is wiser and more efficient. I867-4

Sincerely,

Randall W. Grandpre

USEPA SF
1365271

Response to comment I867-1

See response to Comment No. I474-2.

Response to comment I867-2

See response to Comment No. I295-2.

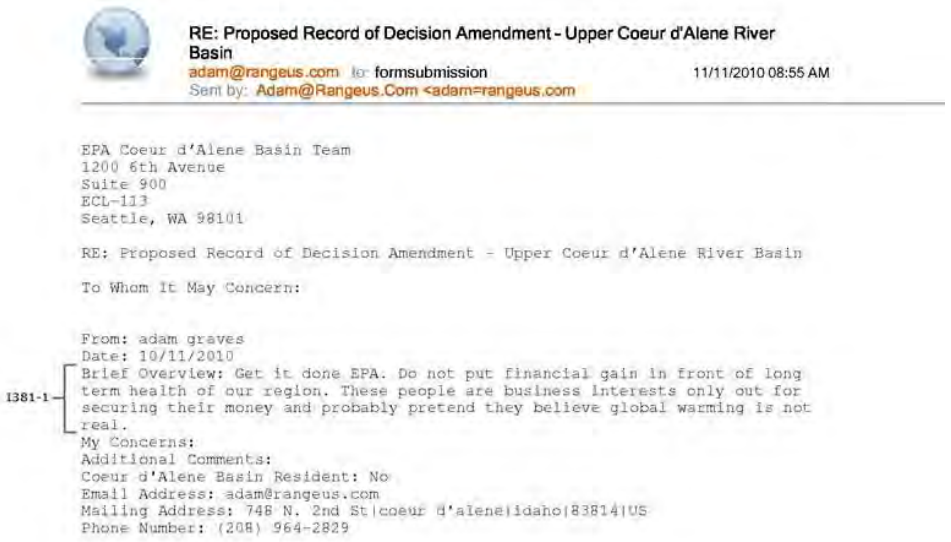
Response to comment I867-3

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. See response to Comment No. I58-1.

Response to comment I867-4

See responses to Comment Nos. I474-2 and I58-2.

Graves, Adam, I381, Letter 616271



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
adam@rangeus.com to formsubmission 11/11/2010 08:55 AM
Sent by: Adam@Rangeus.Com <adam=rangeus.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

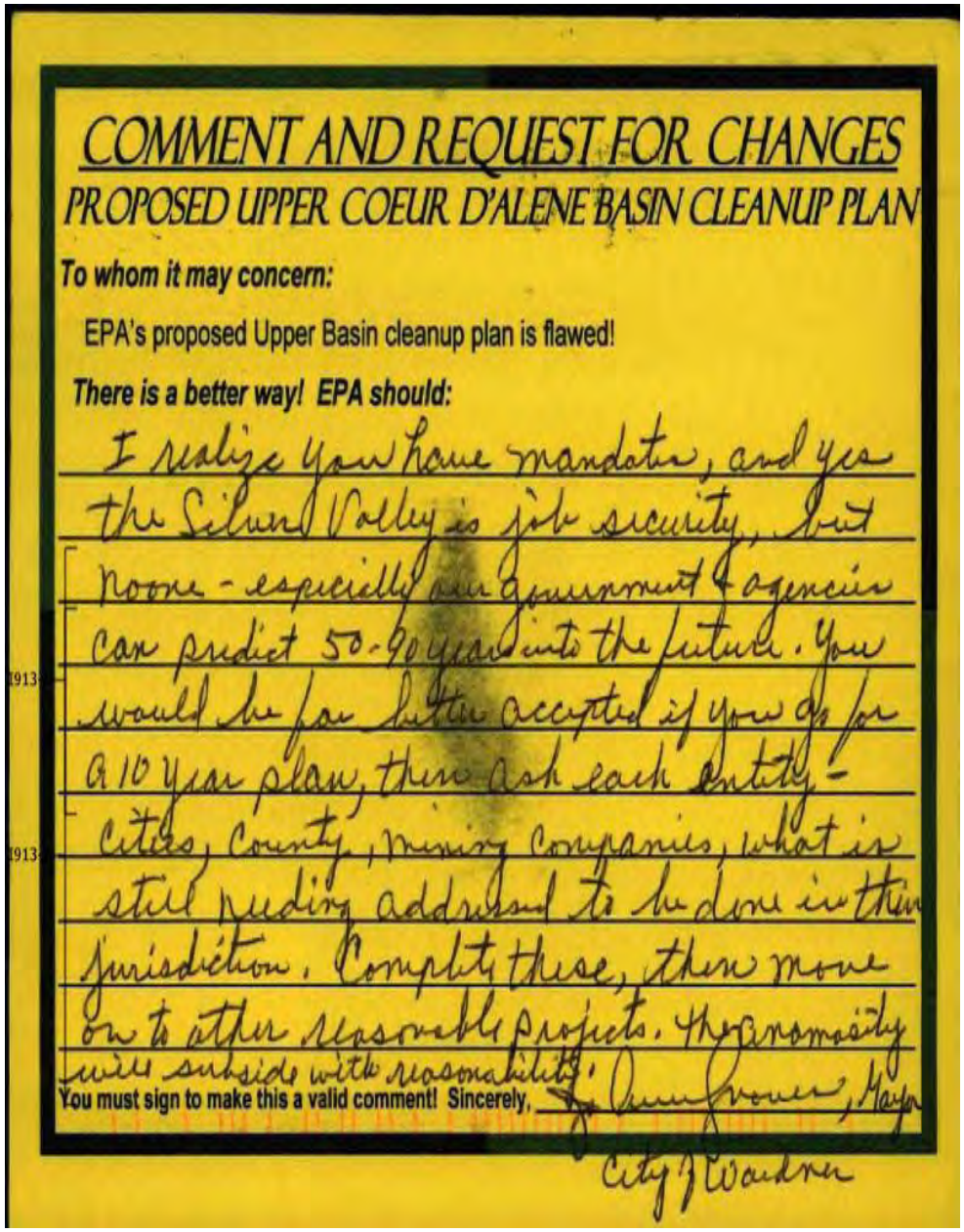
From: adam graves
Date: 10/11/2010
I381-1 Brief Overview: Get it done EPA. Do not put financial gain in front of long term health of our region. These people are business interests only out for securing their money and probably pretend they believe global warming is not real.
My Concerns:
Additional Comments:
Coeur d'Alene Basin Resident: No
Email Address: adam@rangeus.com
Mailing Address: 748 N. 2nd St|coeur d'alene|idaho|83814|US
Phone Number: (208) 964-2829

616271

Response to comment I381-1

Thank you for your comment.

Groves, Joann, I913, Letter 1308802



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

I realize you have mandates, and yes the Silver Valley is job security, but noone - especially our government & agencies can predict 50-60 years into the future. You would be far better accepted if you do for a 10 year plan, then ask each entity - Cities, County, mining companies, what is still needing addressed to be done in their jurisdiction. Complete these, then move on to other reasonable projects. The animosity will subside with reasonability.

You must sign to make this a valid comment! Sincerely, [illegible] Mayor
City of Wardner

I913-1

I913-2

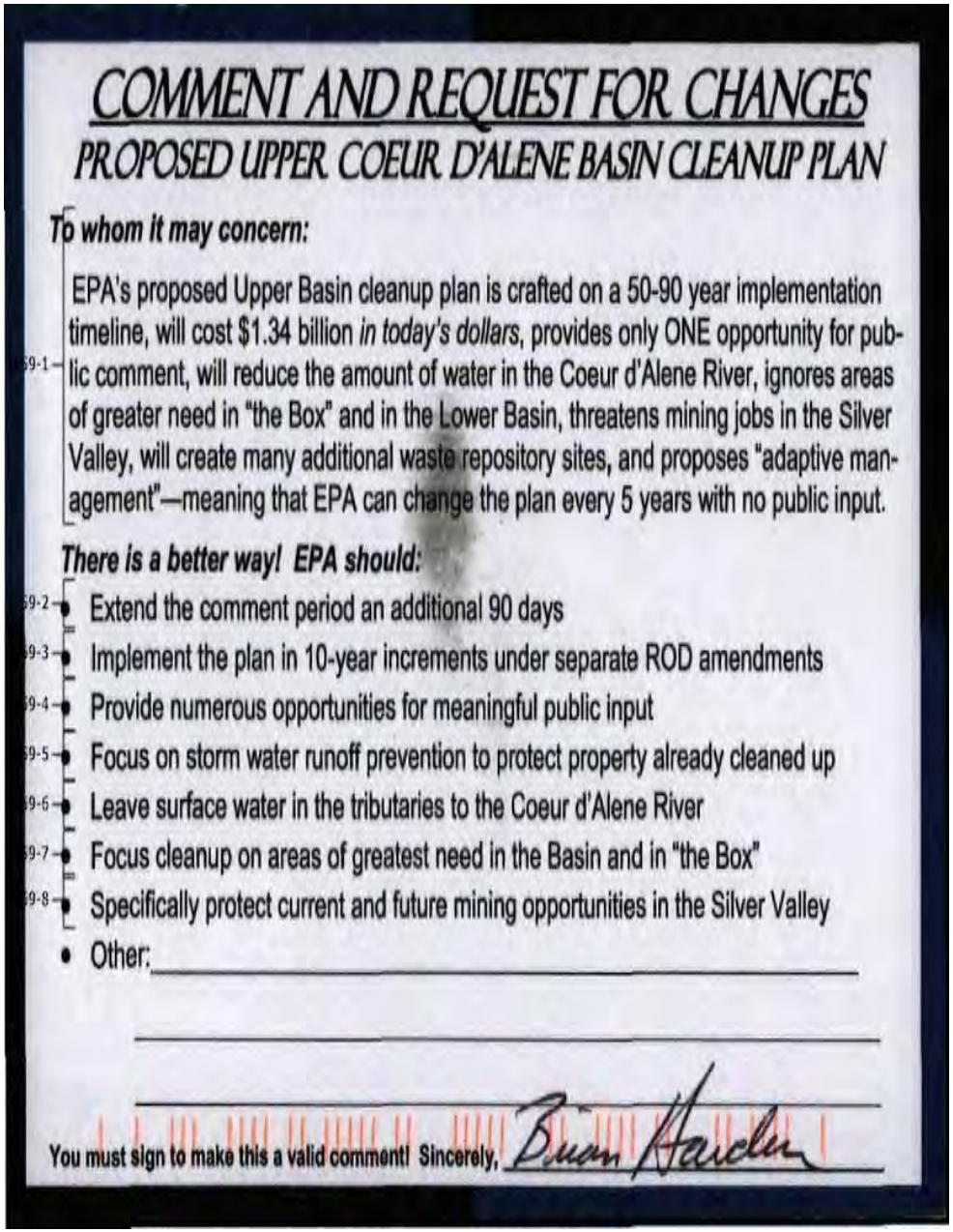
Response to comment I913-1

See responses to Comment Nos. I58-1 and I474-2.

Response to comment I913-2

See responses to Comment Nos. I58-1 and I474-2.

H, Brian, I159, Letter 1357295



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I59-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I59-2 Extend the comment period an additional 90 days
- I59-3 Implement the plan in 10-year increments under separate ROD amendments
- I59-4 Provide numerous opportunities for meaningful public input
- I59-5 Focus on storm water runoff prevention to protect property already cleaned up
- I59-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I59-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I59-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Brian Hardin

Response to comment I159-1
See response to Comment No. I25-1.

Response to comment I159-2
See response to Comment No. I25-2.

Response to comment I159-3
See response to Comment No. I25-3.

Response to comment I159-4
See response to Comment No. I25-4.

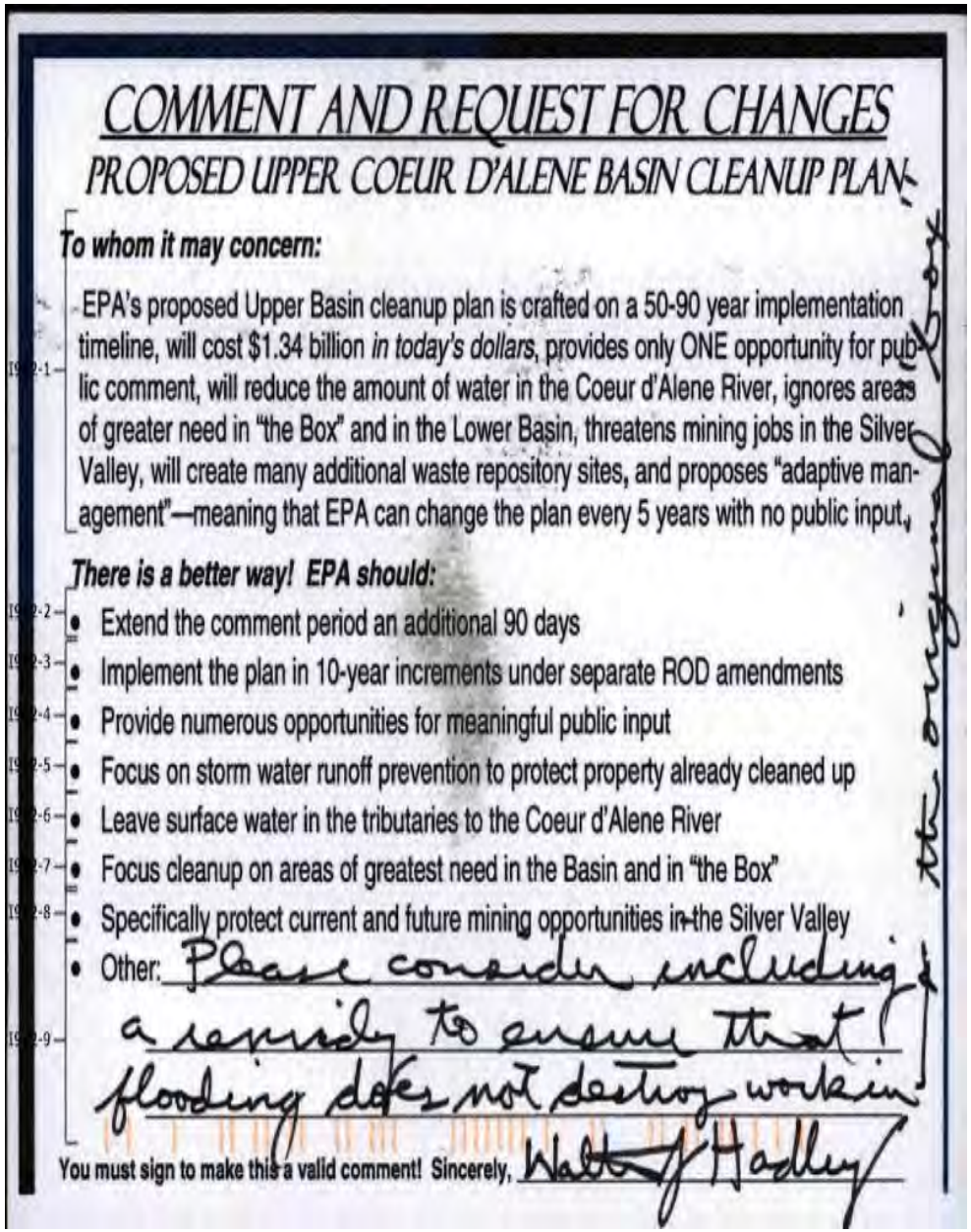
Response to comment I159-5
See response to Comment No. I25-5.

Response to comment I159-6
See response to Comment No. I25-6.

Response to comment I159-7
See response to Comment No. I25-7.

Response to comment I159-8
See response to Comment No. I25-8.

Hadley, Walter J., I912, Letter 1308493



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I912-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I912-2 Extend the comment period an additional 90 days
- I912-3 Implement the plan in 10-year increments under separate ROD amendments
- I912-4 Provide numerous opportunities for meaningful public input
- I912-5 Focus on storm water runoff prevention to protect property already cleaned up
- I912-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I912-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I912-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: Please consider including a capacity to ensure that flooding does not destroy work in the original Box

I912-9

You must sign to make this a valid comment! Sincerely, Walter J Hadley

Response to comment I912-1
See response to Comment No. I25-1.

Response to comment I912-2
See response to Comment No. I25-2.

Response to comment I912-3
See response to Comment No. I25-3.

Response to comment I912-4
See response to Comment No. I25-4.

Response to comment I912-5
See response to Comment No. I25-5.

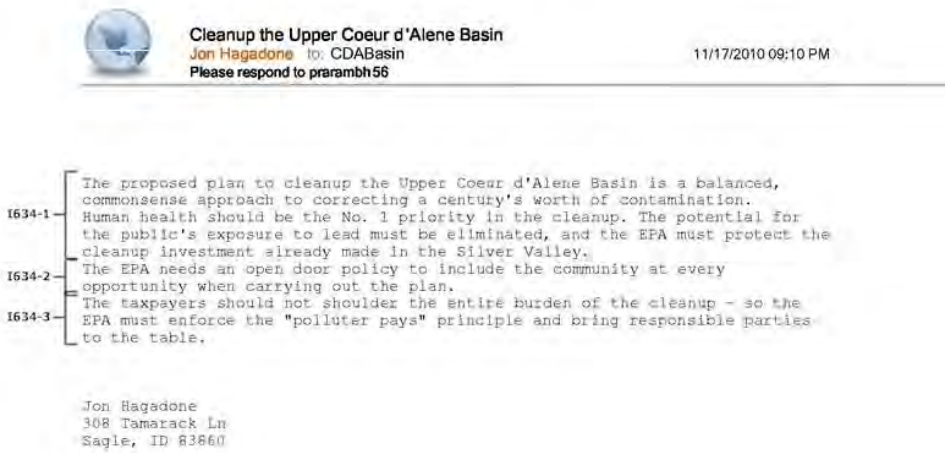
Response to comment I912-6
See response to Comment No. I25-6.

Response to comment I912-7
See response to Comment No. I25-7.

Response to comment I912-8
See response to Comment No. I25-8.

Response to comment I912-9
See responses to Comment Nos. I54-5 and LJ36-3.

Hagadone, Jon, I634, Letter 618241



Cleanup the Upper Coeur d'Alene Basin
Jon Hagadone to: CDABasin 11/17/2010 09:10 PM
Please respond to prarambh56

I634-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I634-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I634-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Jon Hagadone
308 Tamarack Ln
Sagle, ID 83860

618241

Response to comment I634-1

See response to Comment No. I295-1.

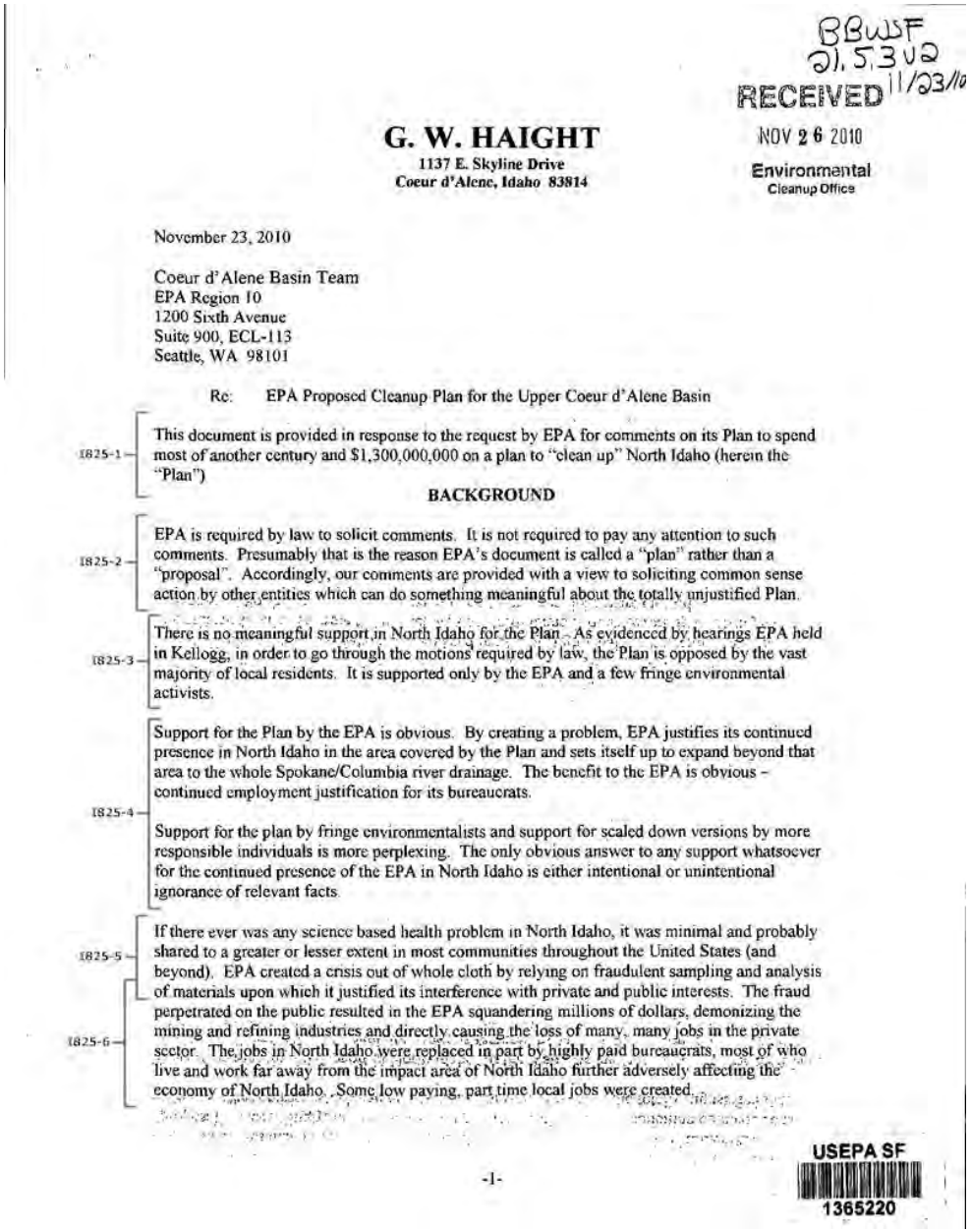
Response to comment I634-2

See response to Comment No. I295-2.

Response to comment I634-3

See response to Comment No. I295-3.

Haight, G.W., I825, Letter 1365220



BBWSF
21.5.3 v2
RECEIVED 11/23/10
NOV 26 2010
Environmental
Cleanup Office

G. W. HAIGHT
1137 E. Skyline Drive
Coeur d'Alene, Idaho 83814

November 23, 2010

Coeur d'Alene Basin Team
EPA Region 10
1200 Sixth Avenue
Suite 900, ECL-113
Seattle, WA 98101

Re: EPA Proposed Cleanup Plan for the Upper Coeur d'Alene Basin

I825-1 This document is provided in response to the request by EPA for comments on its Plan to spend most of another century and $1,300,000,000 on a plan to "clean up" North Idaho (herein the "Plan")

BACKGROUND

I825-2 EPA is required by law to solicit comments. It is not required to pay any attention to such comments. Presumably that is the reason EPA's document is called a "plan" rather than a "proposal". Accordingly, our comments are provided with a view to soliciting common sense action by other entities which can do something meaningful about the totally unjustified Plan.

I825-3 There is no meaningful support in North Idaho for the Plan. As evidenced by hearings EPA held in Kellogg, in order to go through the motions required by law, the Plan is opposed by the vast majority of local residents. It is supported only by the EPA and a few fringe environmental activists.

I825-4 Support for the Plan by the EPA is obvious. By creating a problem, EPA justifies its continued presence in North Idaho in the area covered by the Plan and sets itself up to expand beyond that area to the whole Spokane/Columbia river drainage. The benefit to the EPA is obvious – continued employment justification for its bureaucrats.

Support for the plan by fringe environmentalists and support for scaled down versions by more responsible individuals is more perplexing. The only obvious answer to any support whatsoever for the continued presence of the EPA in North Idaho is either intentional or unintentional ignorance of relevant facts.

I825-5 If there ever was any science based health problem in North Idaho, it was minimal and probably shared to a greater or lesser extent in most communities throughout the United States (and beyond). EPA created a crisis out of whole cloth by relying on fraudulent sampling and analysis of materials upon which it justified its interference with private and public interests. The fraud perpetrated on the public resulted in the EPA squandering millions of dollars, demonizing the mining and refining industries and directly causing the loss of many, many jobs in the private sector. The jobs in North Idaho were replaced in part by highly paid bureaucrats, most of who live and work far away from the impact area of North Idaho further adversely affecting the economy of North Idaho. Some low paying, part time local jobs were created.

I825-6

-1-

USEPA SF
1365220

Response to comment I825-1
Thank you for your comment.

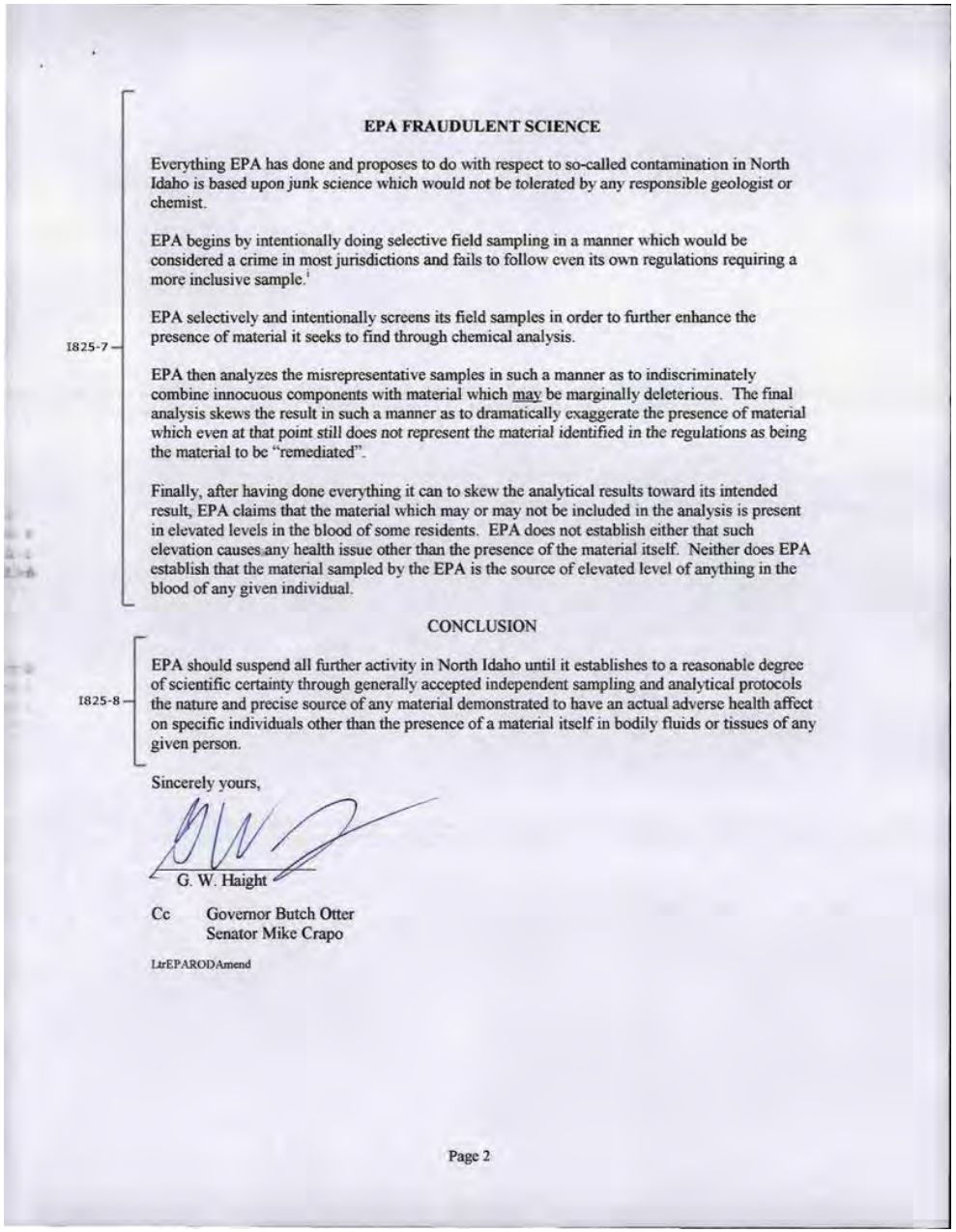
Response to comment I825-2
See response to Comment No. I295-2.

Response to comment I825-3
Comment noted.

Response to comment I825-4
Comment noted.

Response to comment I825-5
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to addressing these unacceptable risks.

Response to comment I825-6
Comment noted.



EPA FRAUDULENT SCIENCE

Everything EPA has done and proposes to do with respect to so-called contamination in North Idaho is based upon junk science which would not be tolerated by any responsible geologist or chemist.

EPA begins by intentionally doing selective field sampling in a manner which would be considered a crime in most jurisdictions and fails to follow even its own regulations requiring a more inclusive sample.[1]

I825-7 EPA selectively and intentionally screens its field samples in order to further enhance the presence of material it seeks to find through chemical analysis.

EPA then analyzes the misrepresentative samples in such a manner as to indiscriminately combine innocuous components with material which may be marginally deleterious. The final analysis skews the result in such a manner as to dramatically exaggerate the presence of material which even at that point still does not represent the material identified in the regulations as being the material to be "remediated".

Finally, after having done everything it can to skew the analytical results toward its intended result, EPA claims that the material which may or may not be included in the analysis is present in elevated levels in the blood of some residents. EPA does not establish either that such elevation causes any health issue other than the presence of the material itself. Neither does EPA establish that the material sampled by the EPA is the source of elevated level of anything in the blood of any given individual.

CONCLUSION

I825-8 EPA should suspend all further activity in North Idaho until it establishes to a reasonable degree of scientific certainty through generally accepted independent sampling and analytical protocols the nature and precise source of any material demonstrated to have an actual adverse health affect on specific individuals other than the presence of a material itself in bodily fluids or tissues of any given person.

Sincerely yours,

G. W. Haight

Cc Governor Butch Otter
Senator Mike Crapo

LtrEPARODAmend

Page 2

Response to comment I825-7

As documented in the FFS, Proposed Plan and ROD Amendment, numerous studies have been conducted over the years in the Upper Basin which irrefutably document the unacceptable risks to human health and the environment. EPA has the responsibility and obligation under CERCLA to address these unacceptable risks and is doing so with the Selected Remedy.

Response to comment I825-8

As documented in the FFS, Proposed Plan and ROD Amendment, numerous studies have been conducted over the years in the Upper Basin which irrefutably document the unacceptable risks to human health and the environment. EPA has the responsibility and obligation under CERCLA to address these unacceptable risks and is doing so with the Selected Remedy. Also see response to Comment I295-1.

Hall, Jack, I635, Letter 618242

Support the Cleanup
Godspeedx11
to:
CDABasin
11/20/2010 12:04 PM
Show Details

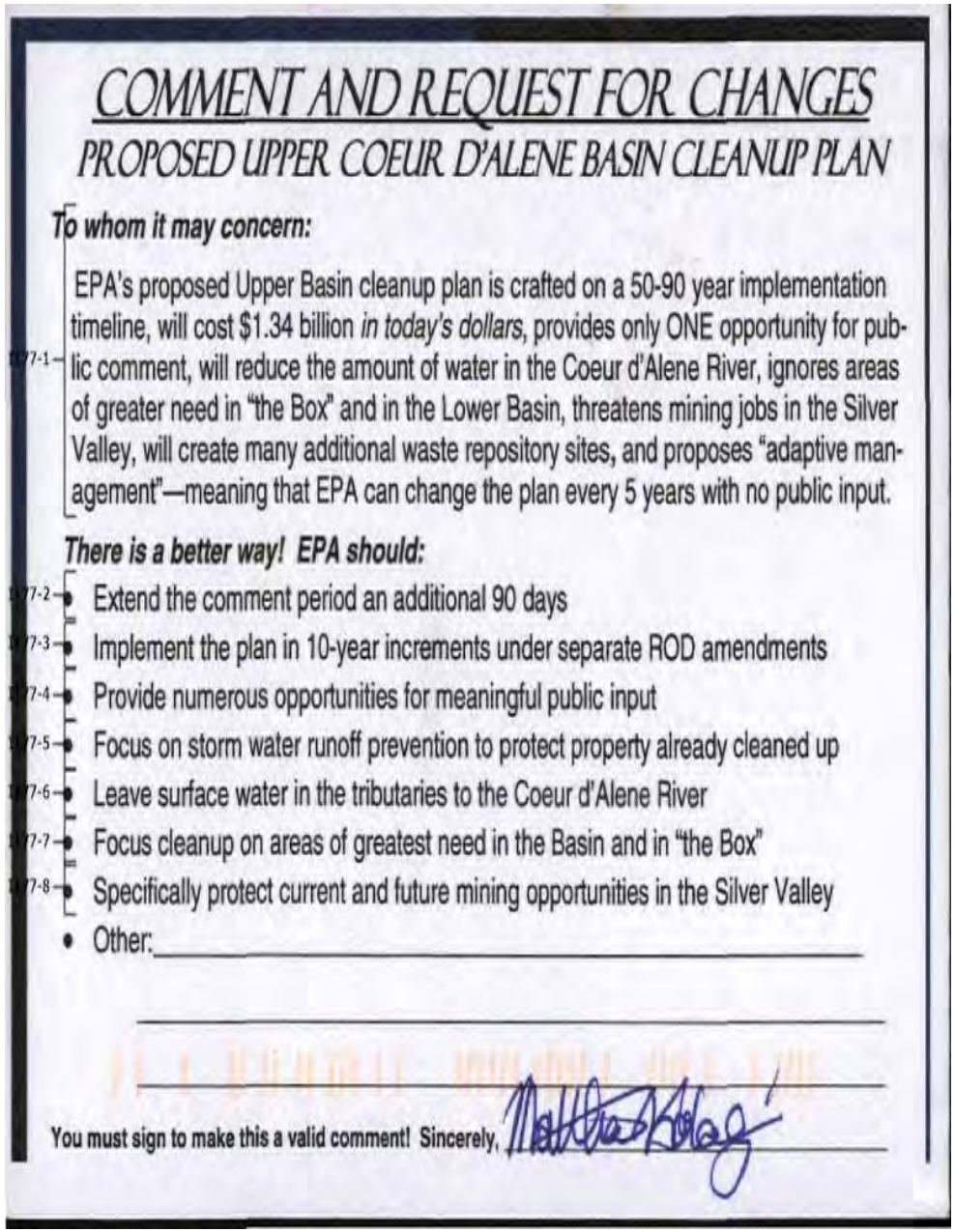
I635-1 I GREW UP IN MULLAN AND SAW WHAT THE MINE WASTE WAS AND DID TO THE SOUTH FORK OF THE COUER D ALENE RIVER. AS ONE MOVES DOWNSTREAM THE EFFECTS INCREASE DRAMATICALLY. THE CLEANUP IS AN AWESOME TASK BUT I FEEL IT IS NEEDED TO MAKE THE BASIN A PLACE THAT IS SAFE AND ENJOYABLE. IT IS A BEAUTIFUL AREA AND CAN BE ENHANCED DRAMATICALLY BY THE CLEANUP.

THANK YOU FOR THE OPPORTUNITY TO EXPRESS MY FEELINGS. JACK R. HALL

618242

Response to comment I635-1
Comment noted and appreciated.

Hallard, Susan, I177, Letter 1357370



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I177-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I177-2 Extend the comment period an additional 90 days
- I177-3 Implement the plan in 10-year increments under separate ROD amendments
- I177-4 Provide numerous opportunities for meaningful public input
- I177-5 Focus on storm water runoff prevention to protect property already cleaned up
- I177-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I177-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I177-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I177-1
See response to Comment No. I25-1.

Response to comment I177-2
See response to Comment No. I25-2.

Response to comment I177-3
See response to Comment No. I25-3.

Response to comment I177-4
See response to Comment No. I25-4.

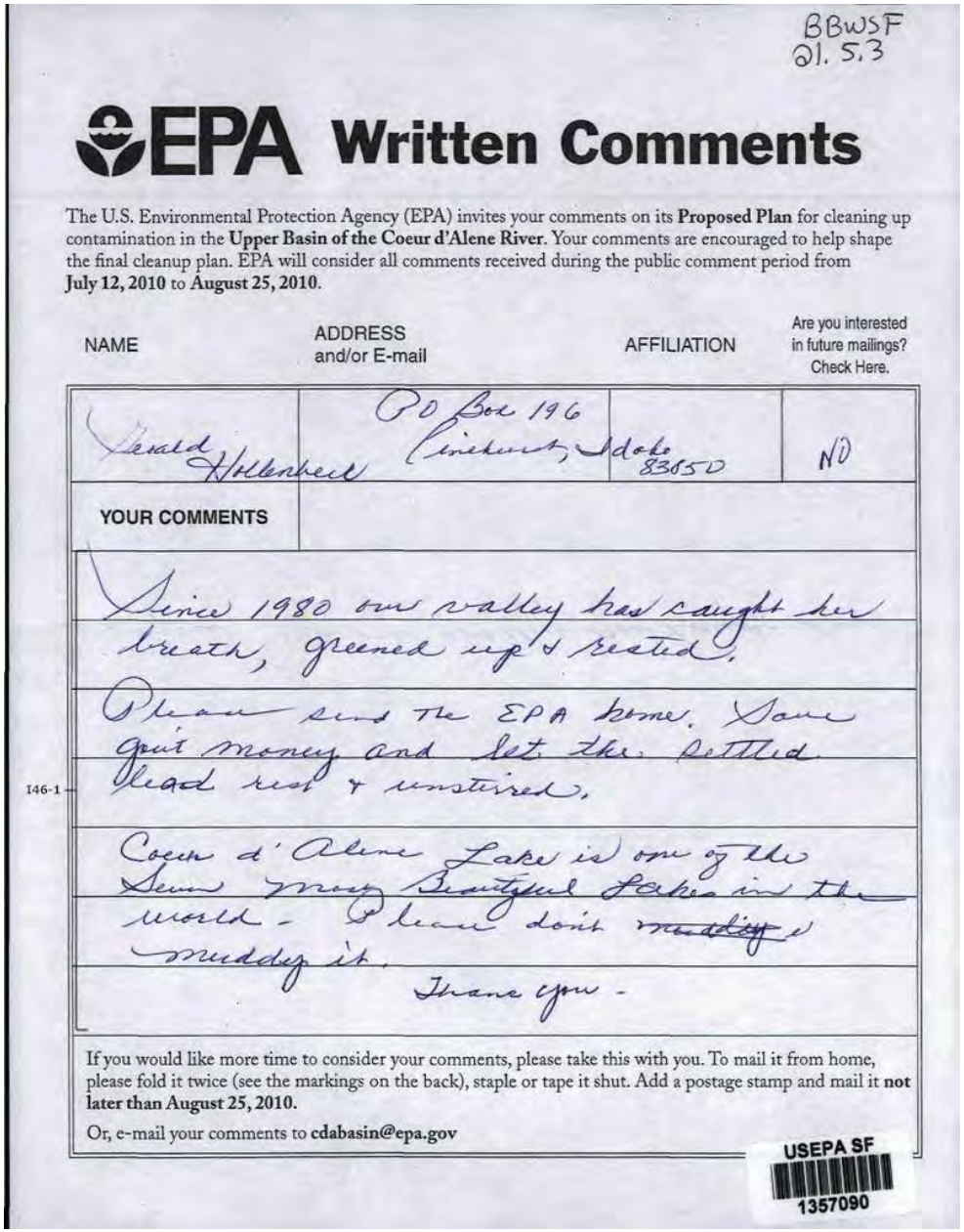
Response to comment I177-5
See response to Comment No. I25-5.

Response to comment I177-6
See response to Comment No. I25-6.

Response to comment I177-7
See response to Comment No. I25-7.

Response to comment I177-8
See response to Comment No. I25-8.

Hallenbeck, Gerald, I46, Letter 1357090



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Gerald Hallenbeck	PO Box 196 Cincinnati, Idaho 83850		NO

YOUR COMMENTS

Since 1980 our valley has caught her breath, greened up & rested.

Please send the EPA home. Save your money and let the settled dead rest & undisturbed.

I46-1

Coeur d'Alene Lake is one of the few most beautiful lakes in the world - Please don't ~~muddy~~ muddy it.

Thank you -

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

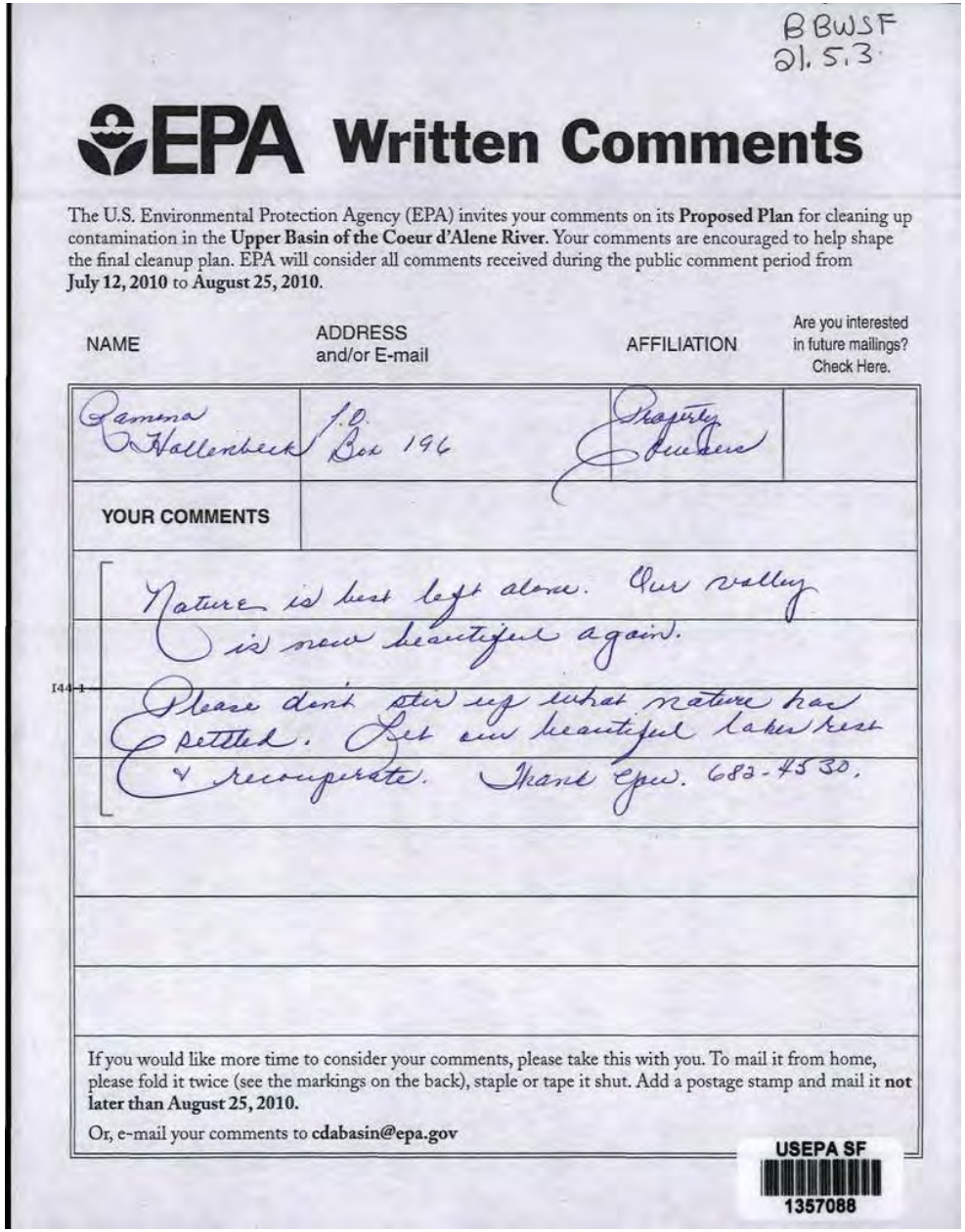
Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357090

Response to comment I46-1

Thank you for your comment.

Hallenbeck, Ramona, I44, Letter 1357088



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River.** Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010.**

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Ramona Hallenbeck	P.O. Box 196	Property Owner	

YOUR COMMENTS

Nature is best left alone. Our valley is now beautiful again.

I44-1 Please don't stir up what nature has settled. Let our beautiful lake rest & recuperate. Thank you. 683-4530.

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357088

Response to comment I44-1

Thank you for your comment.

Hammond, Ray, I636, Letter 618243

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
ray_hammond2002@hotmail.com to formsubmission 11/19/2010 02:32 AM
Sent by: Ray_hammond2002@Hotmail.Com <ray_hammond2002=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Ray Hammond
Date: 1/22/1986
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete
Additional Comments: I do NOT support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I636-1

1. You said that at leats 4 areas where there was obviously Lead in the area had none at all. 1 of which used to have a old mine mill on it. the other were my families properties that used Mine muck to build everything on the land including the road. which you said had no lead in it.

I636-2

2. The lawns you took out here in Mullan the new Grass you put in is HIGH maintenance grass. You have to fertilize the lawn 3-4 times a year for it to not die on us. Before you removed the grass alot of the people didn't have to do that or maybe one time a year. That costs us money.

I636-3

Coeur d'Alene Basin Resident: No
Email Address: ray_hammond2002@hotmail.com
Mailing Address: P.O. box 124, 310 oregon st|Mullan|ID|83846|US
Phone Number: (208) 744-1532

618243

Response to comment I636-1

See response to Comment No. I351-1.

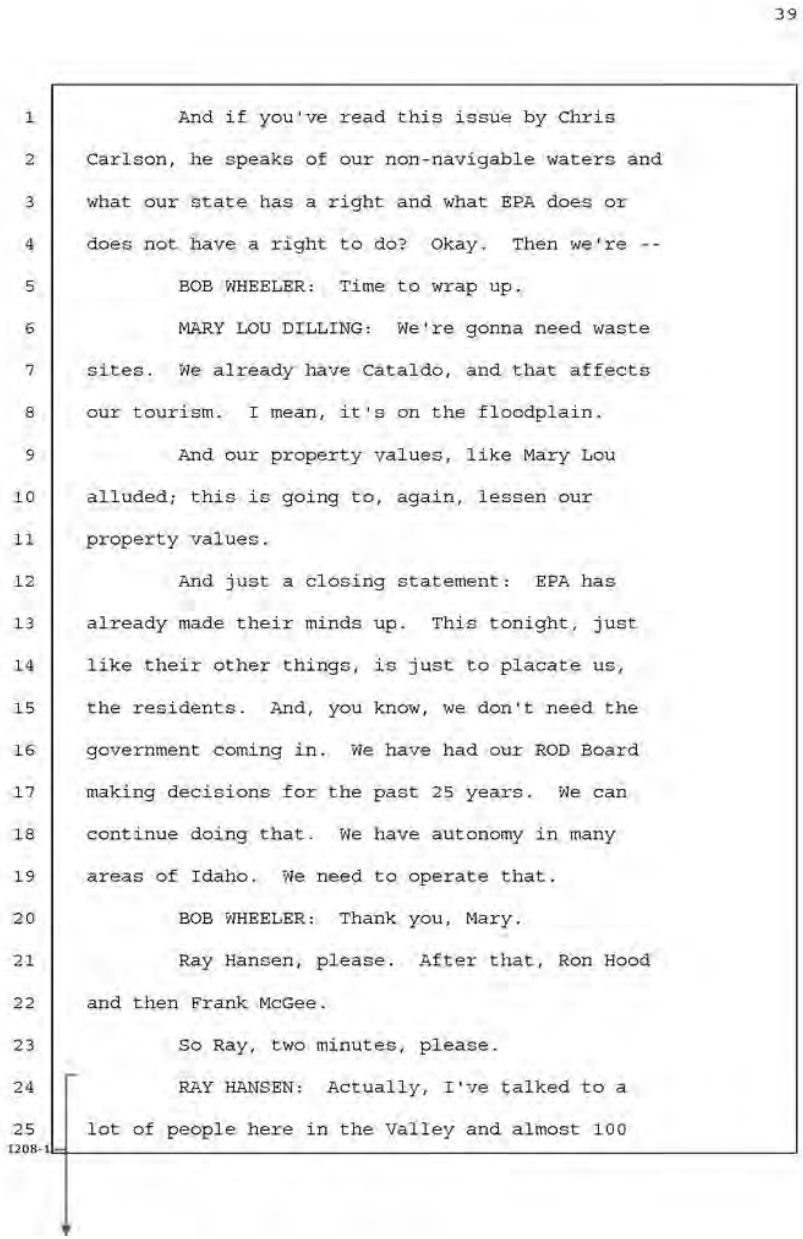
Response to comment I636-2

Comment Noted. See response to Comments No. I58-4 and I822-14 for information regarding EPA's plan for implementation of the Selected Remedy.

Response to comment I636-3

See response to Comment No. I521-8.

Hansen, Ray, I208, Letter 610097-3



39

And if you've read this issue by Chris Carlson, he speaks of our non-navigable waters and what our state has a right and what EPA does or does not have a right to do? Okay. Then we're --

BOB WHEELER: Time to wrap up.

MARY LOU DILLING: We're gonna need waste sites. We already have Cataldo, and that affects our tourism. I mean, it's on the floodplain.

And our property values, like Mary Lou alluded; this is going to, again, lessen our property values.

And just a closing statement: EPA has already made their minds up. This tonight, just like their other things, is just to placate us, the residents. And, you know, we don't need the government coming in. We have had our ROD Board making decisions for the past 25 years. We can continue doing that. We have autonomy in many areas of Idaho. We need to operate that.

BOB WHEELER: Thank you, Mary.

Ray Hansen, please. After that, Ron Hood and then Frank McGee.

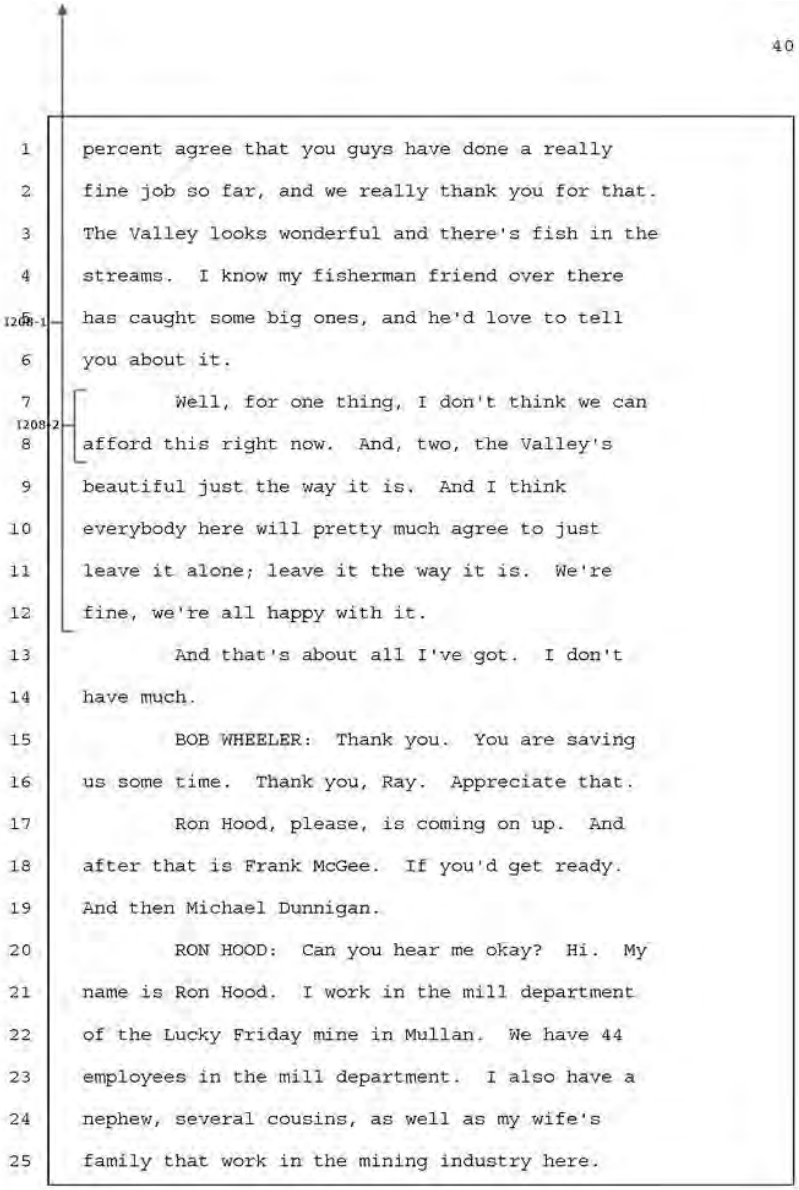
So Ray, two minutes, please.

RAY HANSEN: Actually, I've talked to a lot of people here in the Valley and almost 100

I208-1

Response to comment I208-1

Thank you for your comment. EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.



40

percent agree that you guys have done a really fine job so far, and we really thank you for that. The Valley looks wonderful and there's fish in the streams. I know my fisherman friend over there has caught some big ones, and he'd love to tell you about it. I208-1

Well, for one thing, I don't think we can afford this right now. And, two, the Valley's I208-2 beautiful just the way it is. And I think everybody here will pretty much agree to just leave it alone; leave it the way it is. We're fine, we're all happy with it.

And that's about all I've got. I don't have much.

BOB WHEELER: Thank you. You are saving us some time. Thank you, Ray. Appreciate that.

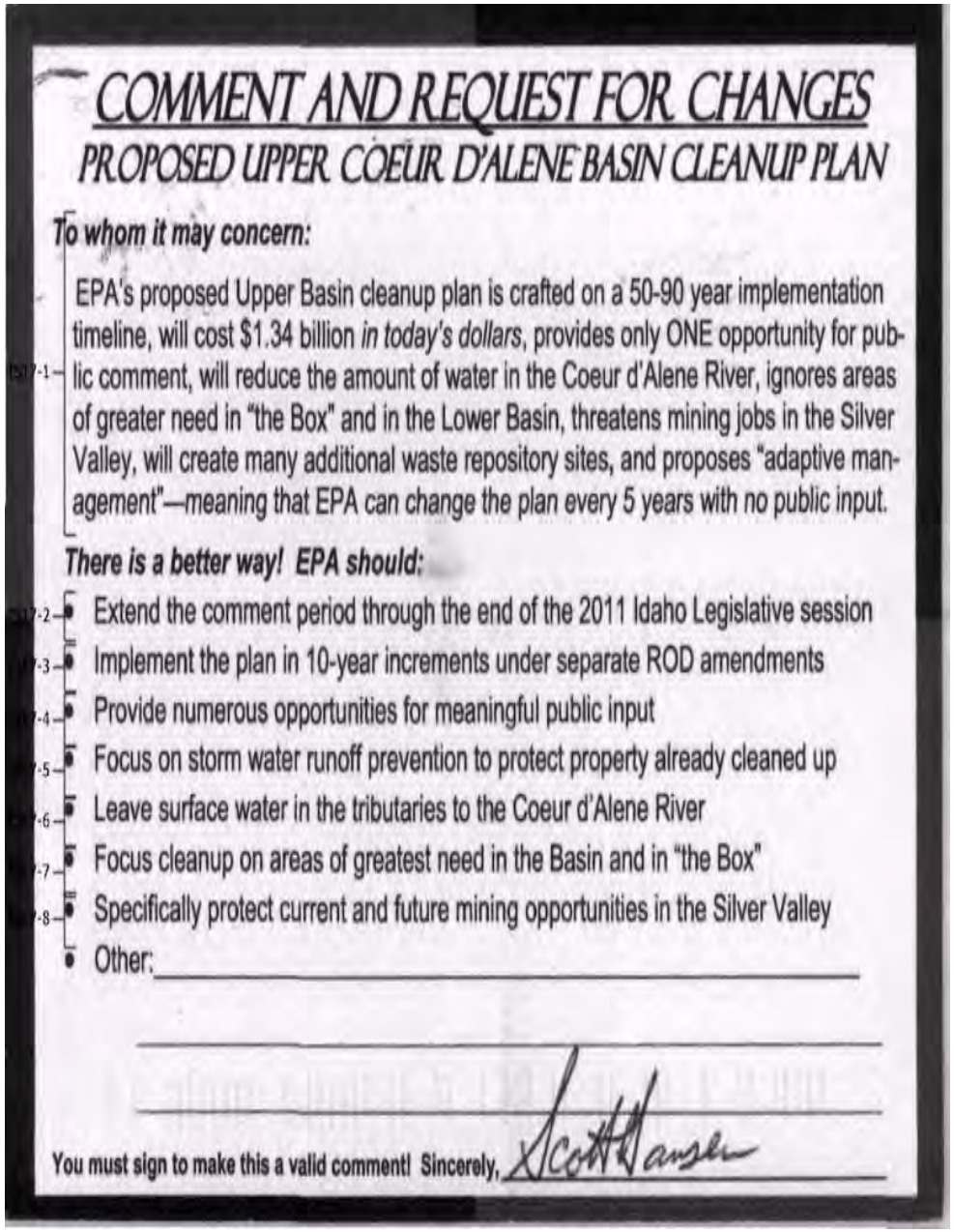
Ron Hood, please, is coming on up. And after that is Frank McGee. If you'd get ready. And then Michael Dunnigan.

RON HOOD: Can you hear me okay? Hi. My name is Ron Hood. I work in the mill department of the Lucky Friday mine in Mullan. We have 44 employees in the mill department. I also have a nephew, several cousins, as well as my wife's family that work in the mining industry here.

Response to comment I208-2

Under the Superfund law, EPA has the responsibility and the authority to take actions to protect human health and the environment. Cost is one of the nine CERCLA remedy selection criteria that EPA has evaluated during the remedy selection process as documented in the ROD Amendment and the FFS Report. See response to Comment No. I58-2.

Hansen, Scott M., I517, Letter 1357639



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I517-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I517-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I517-3 Implement the plan in 10-year increments under separate ROD amendments
- I517-4 Provide numerous opportunities for meaningful public input
- I517-5 Focus on storm water runoff prevention to protect property already cleaned up
- I517-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I517-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I517-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Scott Hansen

Response to comment I517-1
See response to Comment No. I25-1.

Response to comment I517-2
See response to Comment No. I25-2.

Response to comment I517-3
See response to Comment No. I25-3.

Response to comment I517-4
See response to Comment No. I25-4.

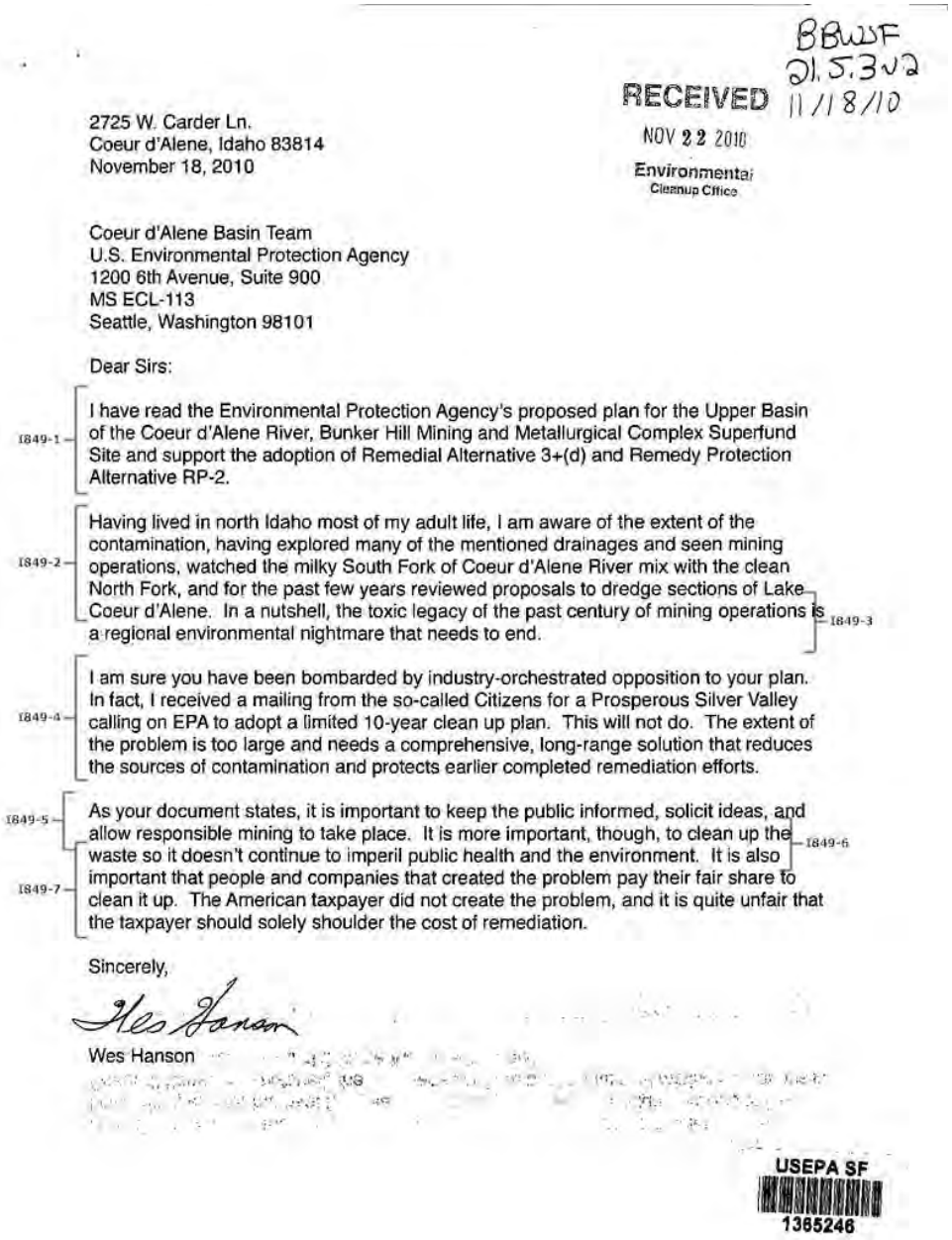
Response to comment I517-5
See response to Comment No. I25-5.

Response to comment I517-6
See response to Comment No. I25-6.

Response to comment I517-7
See response to Comment No. I25-7.

Response to comment I517-8
See response to Comment No. I25-8.

Hanson, Wes, I849, Letter 1365246



BBWF
21.5.3v2
11/18/10

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NOV 22 2010
Environmental
Cleanup Office

2725 W. Carder Ln.
Coeur d'Alene, Idaho 83814
November 18, 2010

Coeur d'Alene Basin Team
U.S. Environmental Protection Agency
1200 6th Avenue, Suite 900
MS ECL-113
Seattle, Washington 98101

Dear Sirs:

I849-1 I have read the Environmental Protection Agency's proposed plan for the Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site and support the adoption of Remedial Alternative 3+(d) and Remedy Protection Alternative RP-2.

I849-2 Having lived in north Idaho most of my adult life, I am aware of the extent of the contamination, having explored many of the mentioned drainages and seen mining operations, watched the milky South Fork of Coeur d'Alene River mix with the clean North Fork, and for the past few years reviewed proposals to dredge sections of Lake Coeur d'Alene. In a nutshell, the toxic legacy of the past century of mining operations is a regional environmental nightmare that needs to end. I849-3

I849-4 I am sure you have been bombarded by industry-orchestrated opposition to your plan. In fact, I received a mailing from the so-called Citizens for a Prosperous Silver Valley calling on EPA to adopt a limited 10-year clean up plan. This will not do. The extent of the problem is too large and needs a comprehensive, long-range solution that reduces the sources of contamination and protects earlier completed remediation efforts.

I849-5 As your document states, it is important to keep the public informed, solicit ideas, and allow responsible mining to take place. It is more important, though, to clean up the waste so it doesn't continue to imperil public health and the environment. I849-6 It is also I849-7 important that people and companies that created the problem pay their fair share to clean it up. The American taxpayer did not create the problem, and it is quite unfair that the taxpayer should solely shoulder the cost of remediation.

Sincerely,

Wes Hanson

Wes Hanson

USEPA SF
1365246

Response to comment I849-1
Comment noted and appreciated.

Response to comment I849-2
Thank you for your comment.

Response to comment I849-3
Comment noted.

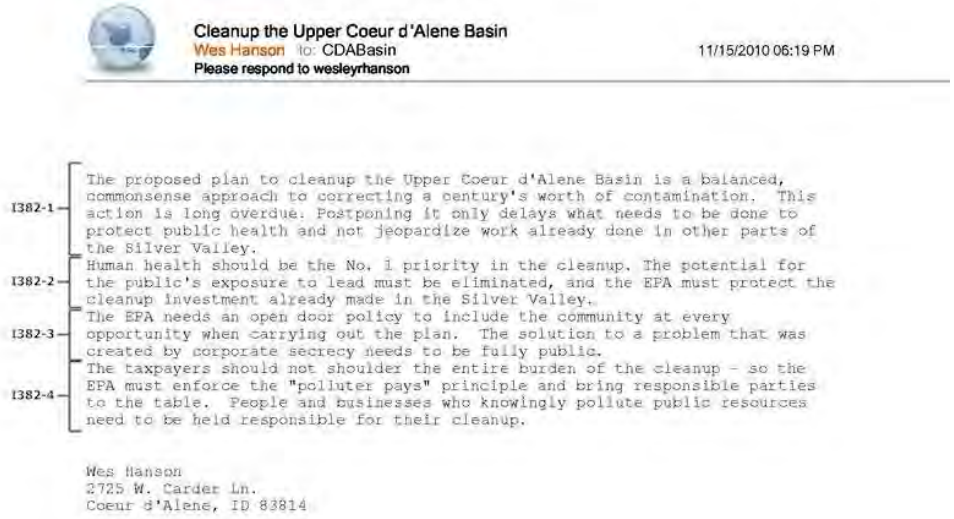
Response to comment I849-4
Thank you for your comments.

Response to comment I849-5
EPA is confident that cleanup and mining can coexist. The proposed cleanup addresses historical contamination from mining activities that began in the late 1880s. Historical mine waste disposal practices were much different than those used today. For example, until 1968, some mine wastes were discharged directly into creeks and rivers. Today, ongoing mining activities are regulated by state and federal laws other than CERCLA.

Response to comment I849-6
EPA agrees regarding the importance of cleaning up the Basin. EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. The Upper Basin cleanup is essential to addressing these unacceptable risks .

Response to comment I849-7
See response to Comment No. I295-3.

Hanson, Wes, I382, Letter 616272



Cleanup the Upper Coeur d'Alene Basin
Wes Hanson to: CDABasin 11/15/2010 06:19 PM
Please respond to wesleyrhanson

I382-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. This action is long overdue. Postponing it only delays what needs to be done to protect public health and not jeopardize work already done in other parts of the Silver Valley.

I382-2 Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I382-3 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan. The solution to a problem that was created by corporate secrecy needs to be fully public.

I382-4 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table. People and businesses who knowingly pollute public resources need to be held responsible for their cleanup.

Wes Hanson
2725 W. Carder Ln.
Coeur d'Alene, ID 83814

616272

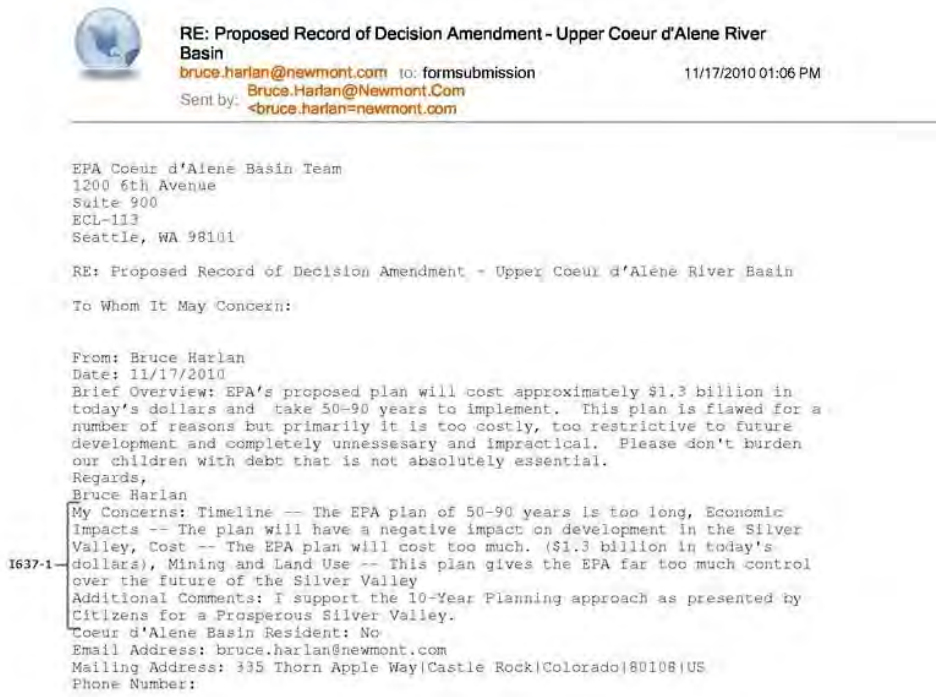
Response to comment I382-1
Comment noted and appreciated.

Response to comment I382-2
See responses to Comment Nos. I295-1 and I54-5.

Response to comment I382-3
EPA remains committed to ongoing, meaningful community involvement during implementation of the cleanup. See response to Comment No. I295-2.

Response to comment I382-4
See response to Comment No. I295-3.

Harlan, Bruce, I637, Letter 618244



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
bruce.harlan@newmont.com to: formsubmission 11/17/2010 01:06 PM
Sent by: Bruce.Harlan@Newmont.Com <bruce.harlan=newmont.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

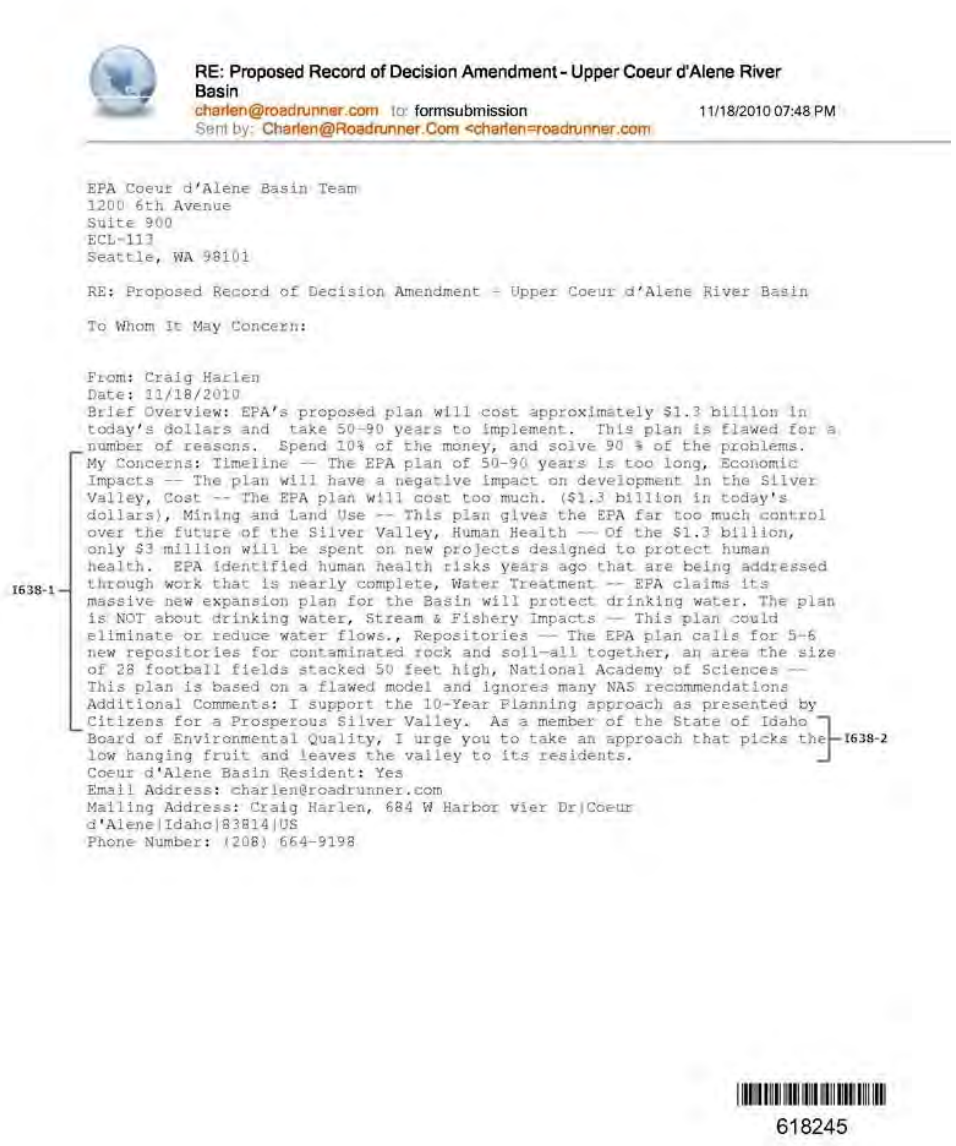
From: Bruce Harlan
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons but primarily it is too costly, too restrictive to future development and completely unnessesary and impractical. Please don't burden our children with debt that is not absolutely essential.
Regards,
Bruce Harlan
I637-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: bruce.harlan@newmont.com
Mailing Address: 335 Thorn Apple Way|Castle Rock|Colorado|80108|US
Phone Number:

618244

Response to comment I637-1

See response to Comment No. I351-1.

Harlen, Craig, I638, Letter 618245



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
charlen@roadrunner.com to: formsubmission 11/18/2010 07:48 PM
Sent by: Charlen@Roadrunner.Com <charlen=roadrunner.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Craig Harlen
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. Spend 10% of the money, and solve 90 % of the problems.
I638-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. As a member of the State of Idaho Board of Environmental Quality, I urge you to take an approach that picks the low hanging fruit and leaves the valley to its residents. I638-2
Coeur d'Alene Basin Resident: Yes
Email Address: charlen@roadrunner.com
Mailing Address: Craig Harlen, 684 W Harbor vier Dr|Coeur d'Alene|Idaho|83814|US
Phone Number: (208) 664-9198

618245

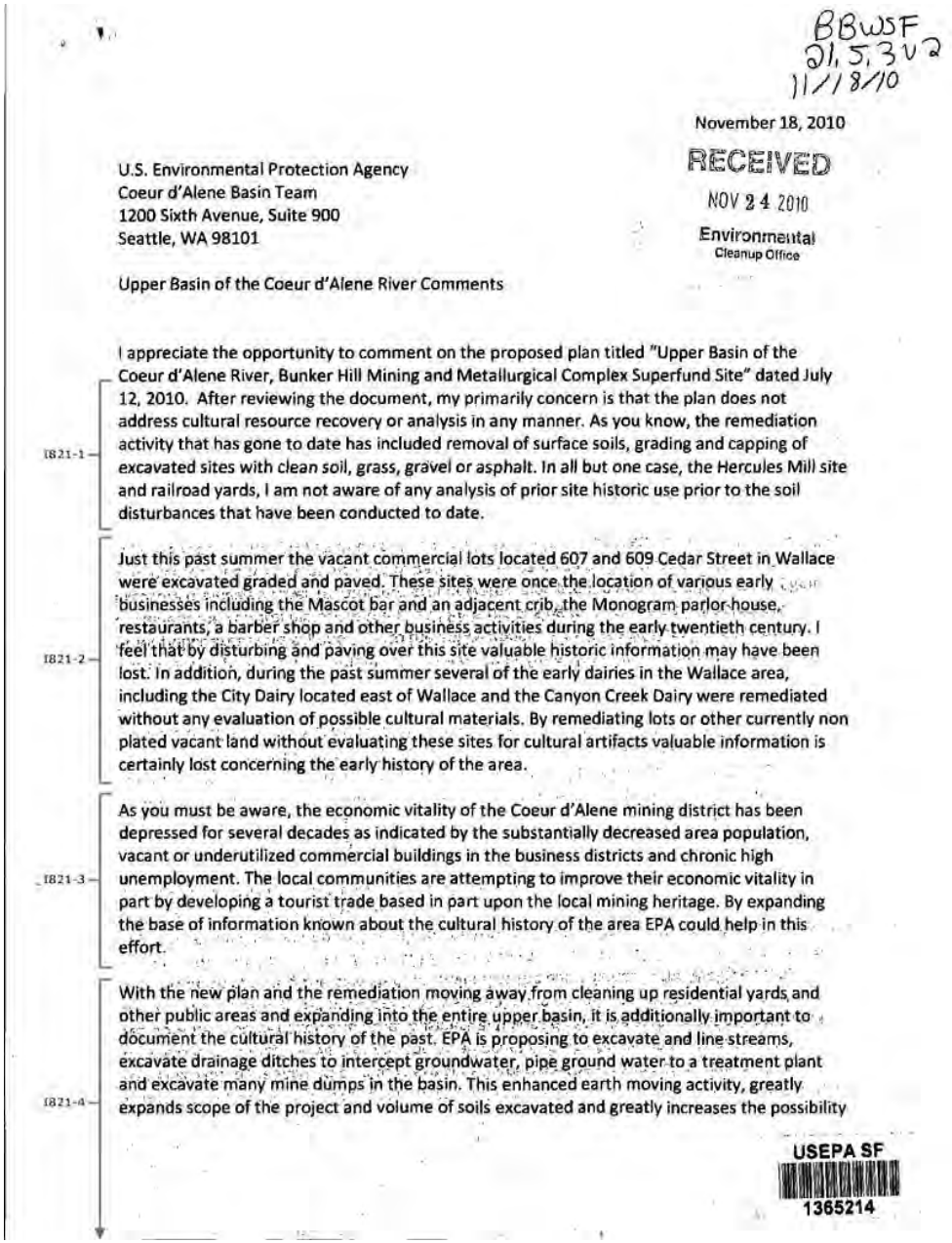
Response to comment I638-1

See response to Comment No. I351-1.

Response to comment I638-2

See response to Comment No. I638-1 above.

Harman, Tom, I821, Letter 1365214



BBWSF
21, 5, 3 v 2
11/18/10

November 18, 2010

RECEIVED
NOV 24 2010
Environmental
Cleanup Office

U.S. Environmental Protection Agency
Coeur d'Alene Basin Team
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Upper Basin of the Coeur d'Alene River Comments

I appreciate the opportunity to comment on the proposed plan titled "Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site" dated July 12, 2010. After reviewing the document, my primarily concern is that the plan does not address cultural resource recovery or analysis in any manner. As you know, the remediation activity that has gone to date has included removal of surface soils, grading and capping of excavated sites with clean soil, grass, gravel or asphalt. In all but one case, the Hercules Mill site and railroad yards, I am not aware of any analysis of prior site historic use prior to the soil disturbances that have been conducted to date. I821-1

Just this past summer the vacant commercial lots located 607 and 609 Cedar Street in Wallace were excavated graded and paved. These sites were once the location of various early businesses including the Mascot bar and an adjacent crib, the Monogram parlor house, restaurants, a barber shop and other business activities during the early twentieth century. I feel that by disturbing and paving over this site valuable historic information may have been lost. In addition, during the past summer several of the early dairies in the Wallace area, including the City Dairy located east of Wallace and the Canyon Creek Dairy were remediated without any evaluation of possible cultural materials. By remediating lots or other currently non plated vacant land without evaluating these sites for cultural artifacts valuable information is certainly lost concerning the early history of the area. I821-2

As you must be aware, the economic vitality of the Coeur d'Alene mining district has been depressed for several decades as indicated by the substantially decreased area population, vacant or underutilized commercial buildings in the business districts and chronic high unemployment. The local communities are attempting to improve their economic vitality in part by developing a tourist trade based in part upon the local mining heritage. By expanding the base of information known about the cultural history of the area EPA could help in this effort. I821-3

With the new plan and the remediation moving away from cleaning up residential yards and other public areas and expanding into the entire upper basin, it is additionally important to document the cultural history of the past. EPA is proposing to excavate and line streams, excavate drainage ditches to intercept groundwater, pipe ground water to a treatment plant and excavate many mine dumps in the basin. This enhanced earth moving activity, greatly expands scope of the project and volume of soils excavated and greatly increases the possibility I821-4

USEPA SF
1365214

Response to comment I821-1

See response to Comment No. I822-11.

Response to comment I821-2

Yard cleanup work involves removing 6 or 12 inches of contaminated soil or gravel and replacement with a similar amount of clean material. Yard cleanup work is done with the consent of property owners and generally does not require removal of foundations or other potentially valuable artifacts. Also see Response to Comment No. I521-8. EPA has identified the National Historic Preservation Act (NHPA) as an Applicable or Relevant and Appropriate Requirement for the Selected Remedy. EPA intends to comply with substantive requirements of the NHPA as it implements the Selected Remedy.

Response to comment I821-3

The National Historic Preservation Act (NHPA) is an ARAR for the Selected Remedy. By complying with NHPA EPA will develop historic and cultural information that will expand the base of knowledge of local history. Recently this type of information has been developed by the Wallace Mining Museum for several cleanup sites in Nine Mile Creek. See responses to Comment Nos. I54-2 and I58-5.

Response to comment I821-4

See response to Comment No. I822-11.

I821-4 of disturbing historic material. I think that a federal agency should lead by example and treat the disturbance of historic cultural material encountered during its projects in the same manor as it requires on federal and tribal lands. This includes researching the site use from various historic records, site surveys, possible artifact excavation and the documentation and interpretation of any artifacts recovered and formatting this information in a manner so that it is available to the public.

Again, I appreciate the opportunity to comment on the proposed plan.

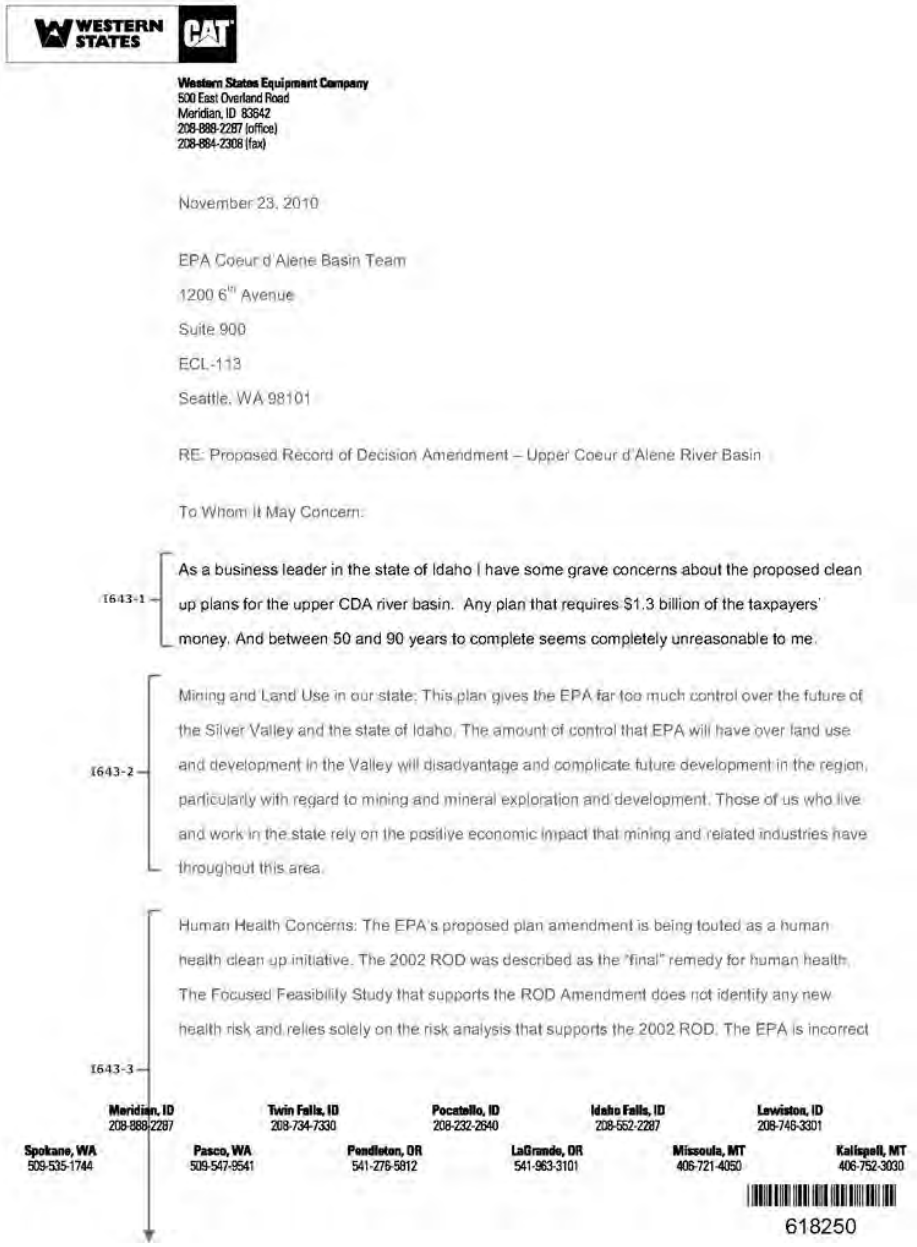
Sincerely,

Tom Harman
Silverton, Idaho

c. Janet Gallimore, Executive Director, SHIPO

No comments

Harris,Tom, I643, Letter 618250



WESTERN STATES CAT

Western States Equipment Company
500 East Overland Road
Meridian, ID 83642
208-888-2287 (office)
208-884-2308 (fax)

November 23, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I643-1 As a business leader in the state of Idaho I have some grave concerns about the proposed clean up plans for the upper CDA river basin. Any plan that requires $1.3 billion of the taxpayers' money. And between 50 and 90 years to complete seems completely unreasonable to me.

I643-2 Mining and Land Use in our state: This plan gives the EPA far too much control over the future of the Silver Valley and the state of Idaho. The amount of control that EPA will have over land use and development in the Valley will disadvantage and complicate future development in the region, particularly with regard to mining and mineral exploration and development. Those of us who live and work in the state rely on the positive economic impact that mining and related industries have throughout this area.

I643-3 Human Health Concerns: The EPA's proposed plan amendment is being touted as a human health clean up initiative. The 2002 ROD was described as the "final" remedy for human health. The Focused Feasibility Study that supports the ROD Amendment does not identify any new health risk and relies solely on the risk analysis that supports the 2002 ROD. The EPA is incorrect

Meridian, ID 208-888-2287 | Twin Falls, ID 208-734-7330 | Pocatello, ID 208-232-2640 | Idaho Falls, ID 208-552-2287 | Lewiston, ID 208-746-3301
Spokane, WA 509-535-1744 | Pasco, WA 509-547-9541 | Pendleton, OR 541-276-5812 | LaGrande, OR 541-963-3101 | Missoula, MT 406-721-4050 | Kalispell, MT 406-752-3030

618250

Response to comment I643-1

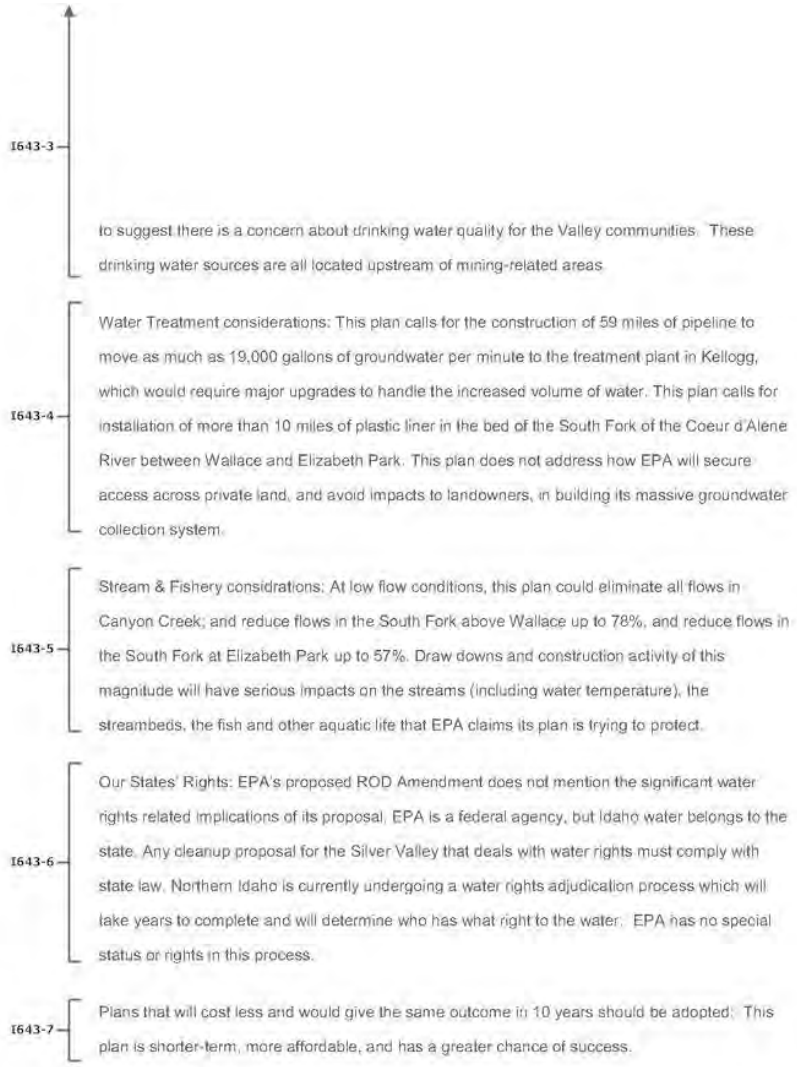
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I643-2

See response to Comment No. I58-5.

Response to comment I643-3

Regarding human health risks, see response to Comment No. 1295-1. EPA has not focused its Selected Remedy on drinking water. In the case of the SFCDR, the applicable or relevant and appropriate requirements (ARARs) that will protect the environment include site-specific ambient water quality criteria. These criteria were developed by the State of Idaho to protect aquatic life. The water quality standards to protect the environment are more stringent than drinking water standards (i.e., maximum contaminant levels [MCLs]) for contaminants of concern in the Basin. (There is one exception -- mercury, as it has not been found to be prevalent in the Upper Basin.) Therefore, EPA believes that achieving ARARs will inherently have a potential drinking water benefit.



I643-3

to suggest there is a concern about drinking water quality for the Valley communities. These drinking water sources are all located upstream of mining-related areas.

I643-4

Water Treatment considerations: This plan calls for the construction of 59 miles of pipeline to move as much as 19,000 gallons of groundwater per minute to the treatment plant in Kellogg, which would require major upgrades to handle the increased volume of water. This plan calls for installation of more than 10 miles of plastic liner in the bed of the South Fork of the Coeur d'Alene River between Wallace and Elizabeth Park. This plan does not address how EPA will secure access across private land, and avoid impacts to landowners, in building its massive groundwater collection system.

I643-5

Stream & Fishery considrations: At low flow conditions, this plan could eliminate all flows in Canyon Creek; and reduce flows in the South Fork above Wallace up to 78%, and reduce flows in the South Fork at Elizabeth Park up to 57%. Draw downs and construction activity of this magnitude will have serious impacts on the streams (including water temperature), the streambeds, the fish and other aquatic life that EPA claims its plan is trying to protect.

I643-6

Our States' Rights: EPA's proposed ROD Amendment does not mention the significant water rights related implications of its proposal. EPA is a federal agency, but Idaho water belongs to the state. Any cleanup proposal for the Silver Valley that deals with water rights must comply with state law. Northern Idaho is currently undergoing a water rights adjudication process which will take years to complete and will determine who has what right to the water. EPA has no special status or rights in this process.

I643-7

Plans that will cost less and would give the same outcome in 10 years should be adopted. This plan is shorter-term, more affordable, and has a greater chance of success.

Response to comment I643-4

With regard to the proposed liner action along the SFCDR, see response to Comment No. I828-10. With regard to private land access for pipelines see response to Comment No. I248-1.

Response to comment I643-5

It is unclear where the percent reductions referenced in the comment came from. EPA has conducted an evaluation of potential stream flow reductions related to the Selected Remedy and the estimated reductions are relatively low. See response to Comment No. I54-8. Regarding potential ecosystem impacts, see response to Comment No. LC33-10.

Response to comment I643-6

EPA has received notice of the Northern Idaho Adjudication but is not required to participate in the adjudication at this time. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I643-7

See response to Comment No. I474-2.

I643-8

The 10-Year Plan:

- Would cost only $150 - $175 million
- Is based on actual data
- Includes remedy protection in towns and populated areas
- Includes a $2 million study to support flood control in the Valley
- Allows multiple opportunities for meaningful public input
- Focuses on priority sources of zinc loading above Wallace (Canyon/Nine Mile creeks) and in the "Box"
- Will not dewater the Coeur d'Alene River
- Establishes achievable goals and benchmarks
- Will not require massive treatment plant upgrades
- Respects existing private property rights, water rights and states rights
- Protects current and future economic development, including mining and land-use opportunities in the Silver Valley
- Requires no additional repositories
- Improves fisheries through site-specific actions and proven technologies
- Improves water quality standards more quickly and at less cost
- Is best for the Valley, its residents and for Idaho
- Is a *better way*!

Thank you for the opportunity to comment on your plan I look forward to seeing a more reasonable EPA approach in the future.

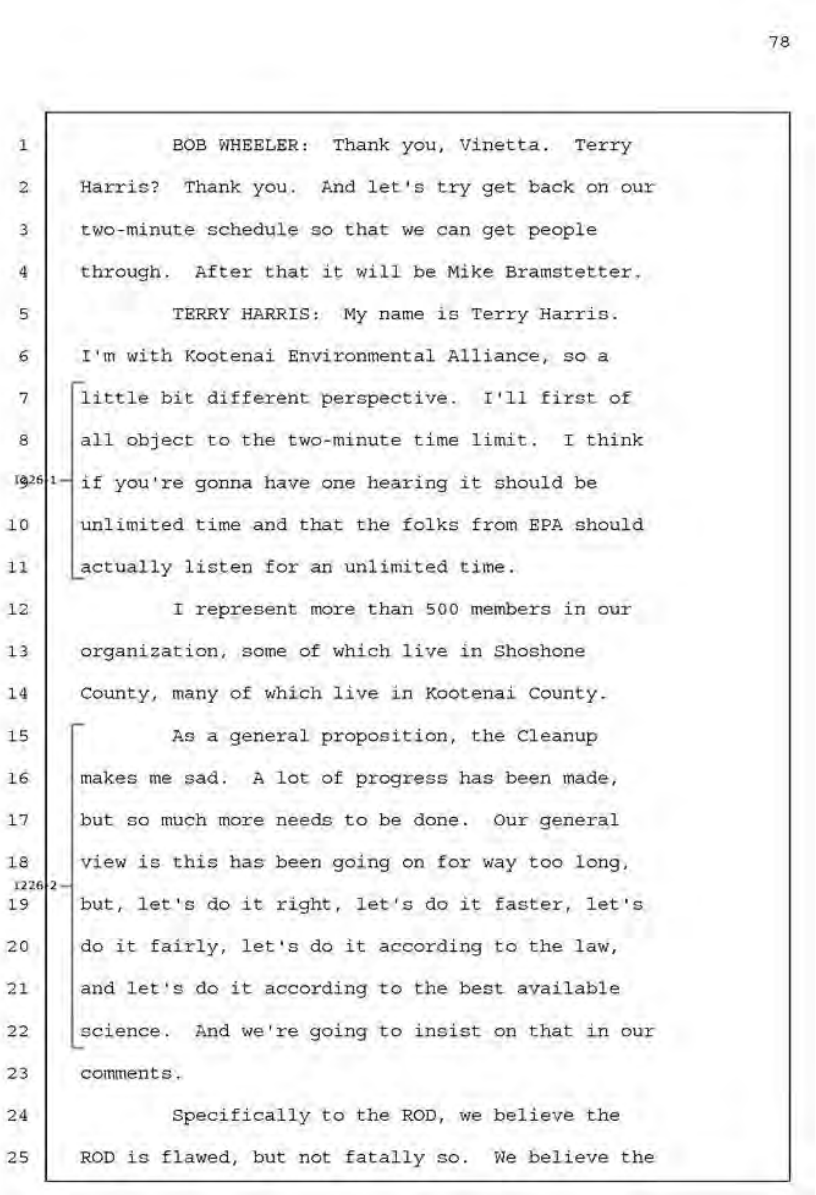
Thomas G Harris

President

Response to comment I643-8

See response to Comment No. I474-2.

Harris, Terry, I226, Letter 610097-21



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BOB WHEELER: Thank you, Vinetta. Terry Harris? Thank you. And let's try get back on our two-minute schedule so that we can get people through. After that it will be Mike Bramstetter.

TERRY HARRIS: My name is Terry Harris. I'm with Kootenai Environmental Alliance, so a little bit different perspective. I'll first of all object to the two-minute time limit. I think I226-1 if you're gonna have one hearing it should be unlimited time and that the folks from EPA should actually listen for an unlimited time.

I represent more than 500 members in our organization, some of which live in Shoshone County, many of which live in Kootenai County.

As a general proposition, the Cleanup makes me sad. A lot of progress has been made, but so much more needs to be done. Our general view is this has been going on for way too long, I226-2 but, let's do it right, let's do it faster, let's do it fairly, let's do it according to the law, and let's do it according to the best available science. And we're going to insist on that in our comments.

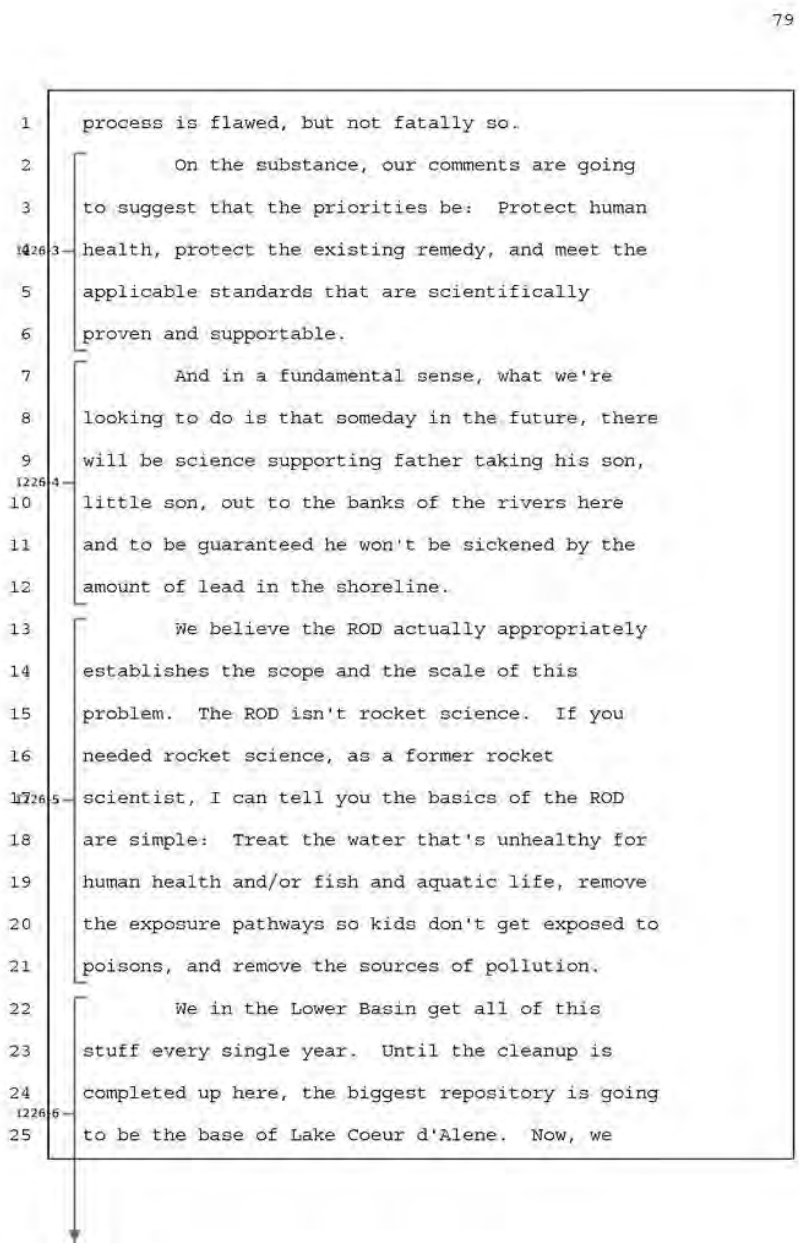
Specifically to the ROD, we believe the ROD is flawed, but not fatally so. We believe the

Response to comment I226-1

As described in the ROD Amendment, Part 2, Section 3.0, EPA has gone to great lengths to engage the public in the remedy selection process and gather viewpoints on all aspects of the process. The public session was one of a number of opportunities for public comment.

Response to comment I226-2

Thank you for your comment. See response to Comment No. I58-1 regarding the duration of the Selected Remedy.



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process is flawed, but not fatally so.

On the substance, our comments are going to suggest that the priorities be: Protect human I226-3 health, protect the existing remedy, and meet the applicable standards that are scientifically proven and supportable.

And in a fundamental sense, what we're looking to do is that someday in the future, there will be science supporting father taking his son, I226-4 little son, out to the banks of the rivers here and to be guaranteed he won't be sickened by the amount of lead in the shoreline.

We believe the ROD actually appropriately establishes the scope and the scale of this problem. The ROD isn't rocket science. If you needed rocket science, as a former rocket I226-5 scientist, I can tell you the basics of the ROD are simple: Treat the water that's unhealthy for human health and/or fish and aquatic life, remove the exposure pathways so kids don't get exposed to poisons, and remove the sources of pollution.

We in the Lower Basin get all of this stuff every single year. Until the cleanup is completed up here, the biggest repository is going I226-6 to be the base of Lake Coeur d'Alene. Now, we

Response to comment I226-3

Comment noted. In general, EPA agrees with these priorities and this is reflected in the Upper Basin ROD Amendment.

Response to comment I226-4

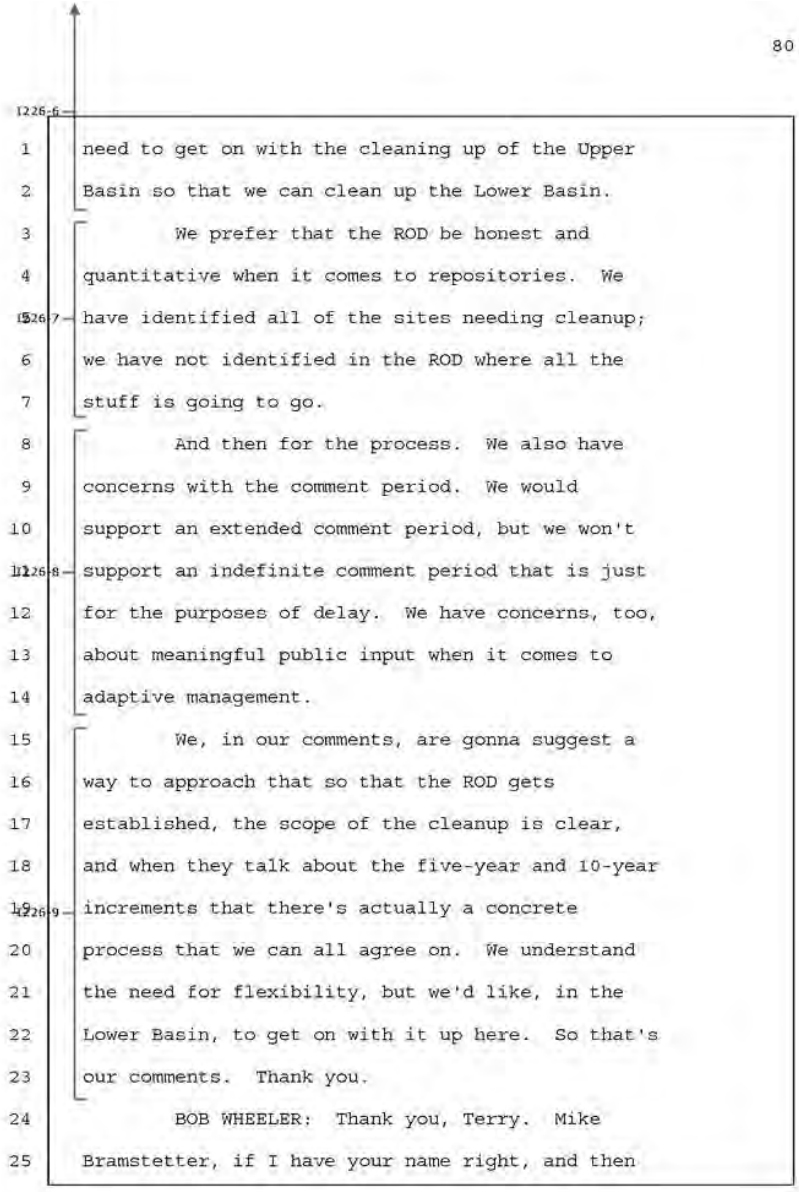
Comment noted. See response to Comment No. I295-1.

Response to comment I226-5

Thank you for your comment.

Response to comment I226-6

Thank you for your comment.



80

I226-6

need to get on with the cleaning up of the Upper Basin so that we can clean up the Lower Basin.

We prefer that the ROD be honest and quantitative when it comes to repositories. We I226-7 have identified all of the sites needing cleanup; we have not identified in the ROD where all the stuff is going to go.

And then for the process. We also have concerns with the comment period. We would support an extended comment period, but we won't I226-8 support an indefinite comment period that is just for the purposes of delay. We have concerns, too, about meaningful public input when it comes to adaptive management.

We, in our comments, are gonna suggest a way to approach that so that the ROD gets established, the scope of the cleanup is clear, and when they talk about the five-year and 10-year I226-9 increments that there's actually a concrete process that we can all agree on. We understand the need for flexibility, but we'd like, in the Lower Basin, to get on with it up here. So that's our comments. Thank you.

BOB WHEELER: Thank you, Terry. Mike Bramstetter, if I have your name right, and then

Response to comment I226-7

See response to Comment No. I54-3.

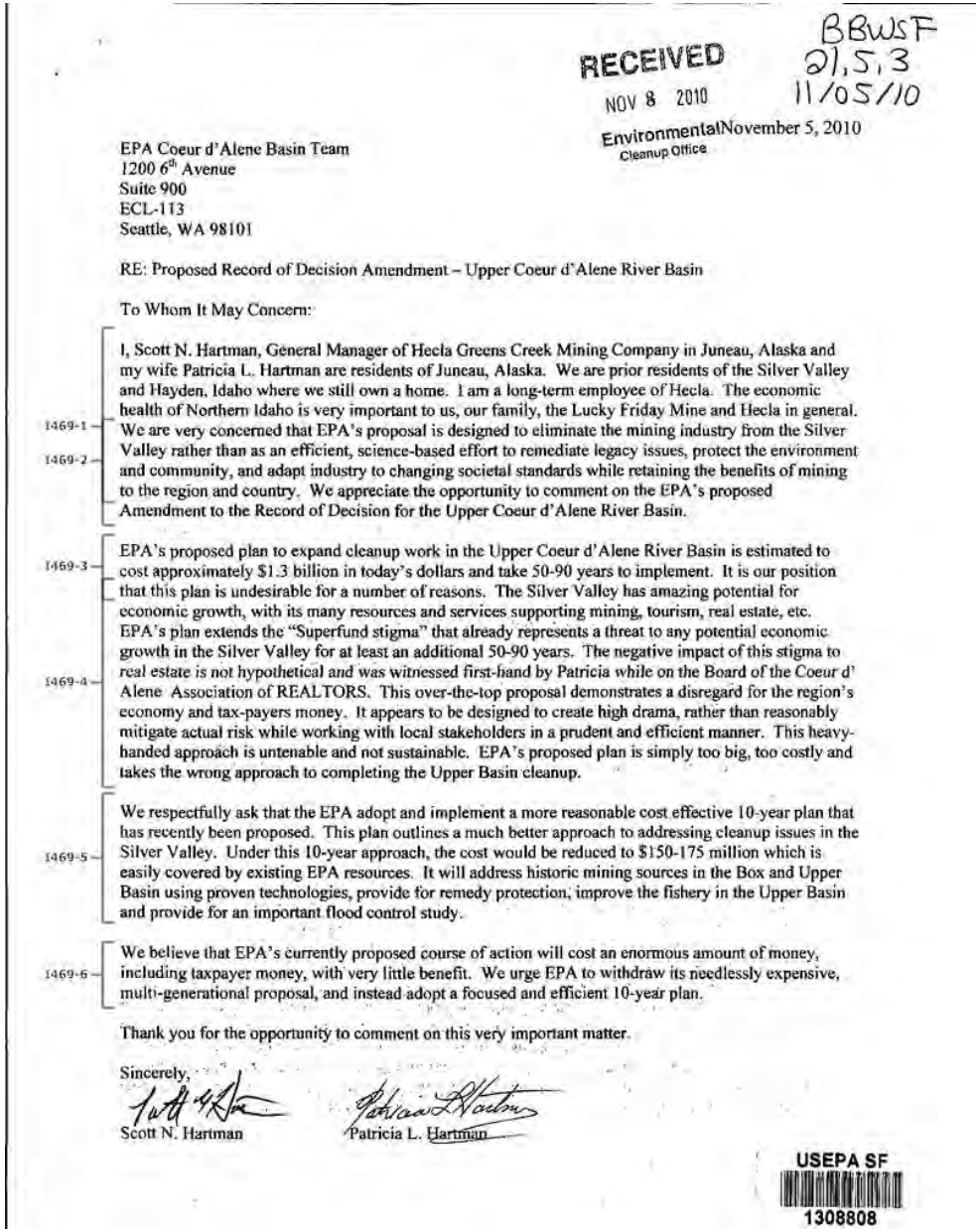
Response to comment I226-8

See responses to Comment Nos. I54-6 and LJ11-2.

Response to comment I226-9

See responses to Comment Nos. I58-4 and LJ11-2.

Hartman, Scott; Hartman, Patricia, I469, Letter 1308808



RECEIVED
NOV 8 2010
Environmental Cleanup Office

BBWSF
21,5,3
11/05/10

November 5, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I, Scott N. Hartman, General Manager of Hecla Greens Creek Mining Company in Juneau, Alaska and my wife Patricia L. Hartman are residents of Juneau, Alaska. We are prior residents of the Silver Valley and Hayden, Idaho where we still own a home. I am a long-term employee of Hecla. The economic health of Northern Idaho is very important to us, our family, the Lucky Friday Mine and Hecla in general.

I469-1 We are very concerned that EPA's proposal is designed to eliminate the mining industry from the Silver Valley rather than as an efficient, science-based effort to remediate legacy issues, protect the environment and community, and adapt industry to changing societal standards while retaining the benefits of mining to the region and country. We appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I469-2

I469-3 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is our position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. The negative impact of this stigma to real estate is not hypothetical and was witnessed first-hand by Patricia while on the Board of the Coeur d' Alene Association of REALTORS. This over-the-top proposal demonstrates a disregard for the region's economy and tax-payers money. It appears to be designed to create high drama, rather than reasonably mitigate actual risk while working with local stakeholders in a prudent and efficient manner. This heavy-handed approach is untenable and not sustainable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I469-4

I469-5 We respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I469-6 We believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. We urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Scott N. Hartman

Patricia L. Hartman

USEPA SF
1308808

Response to comment I469-1
See response to Comment No. I58-5.

Response to comment I469-2
See response to Comment No. I58-5.

Response to comment I469-3
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I469-4
See responses to Comment Nos. I474-1, I58-1, and I58-2.

Response to comment I469-5
See response to Comment No. I474-2.

Response to comment I469-6
See responses to Comment Nos. I58-2 and I474-2.

Hartmann, Mark, I11, Letter 896734

Cd'A cleanup plan
Hartmann, Mark
to:
CDABasin
07/14/2010 01:09 PM
Show Details

I11-1 — The superfund cleanup in the Silver Valley needs to end. As stated by Terry Harwood, the cleanup of contaminated human properties is nearly complete. With the human health issues resolved, the program should end. We do not need to be in the business of remediation for wildlife. Please finally close the book on the Superfund cleanup in the Silver Valley. Human health has been protected and your job is done.

Thanks for considering my comments.

Mark A. Hartmann PE
314 Cedar St
Wallace, ID 83873
208.512.1728

896734

Response to comment I11-1

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to people, wildlife, fish, and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

Hasz, Fred, I645, Letter 618254

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
fhazard@live.com to: formsubmission 11/19/2010 06:09 AM
Sent by: Fhazard@Live.Com <fhazard=live.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Fred Hasz
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: The EPA is In the Silver Valley is a perfect example of a totally out of control government agency with no checks put on them . Get out of the Silver valley.
You are no longer needed here. Spend tax dollars unnecessarily some place else.
Coeur d'Alene Basin Resident: Yes
Email Address: fhazard@live.com
Mailing Address:
Phone Number:

I645-1
I645-2

618254

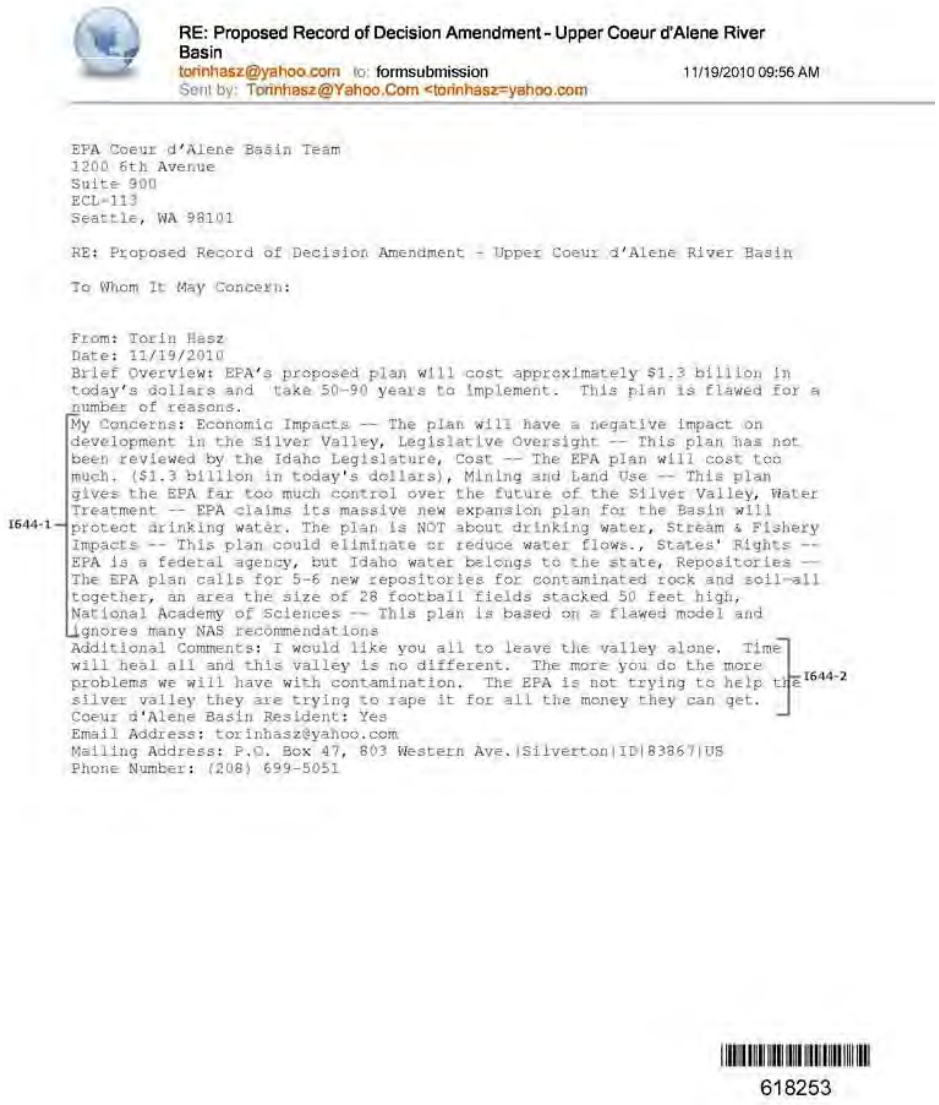
Response to comment I645-1

See response to Comment No. I351-1.

Response to comment I645-2

Comment noted.

Hasz, Torin, I644, Letter 618253



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
torinhasz@yahoo.com to: formsubmission 11/19/2010 09:56 AM
Sent by: Torinhasz@Yahoo.Com <torinhasz=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Torin Hasz
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I would like you all to leave the valley alone. Time will heal all and this valley is no different. The more you do the more problems we will have with contamination. The EPA is not trying to help the silver valley they are trying to rape it for all the money they can get.
Coeur d'Alene Basin Resident: Yes
Email Address: torinhasz@yahoo.com
Mailing Address: P.O. Box 47, 803 Western Ave.|Silverton|ID|83867|US
Phone Number: (208) 699-5051

I644-1
I644-2

618253

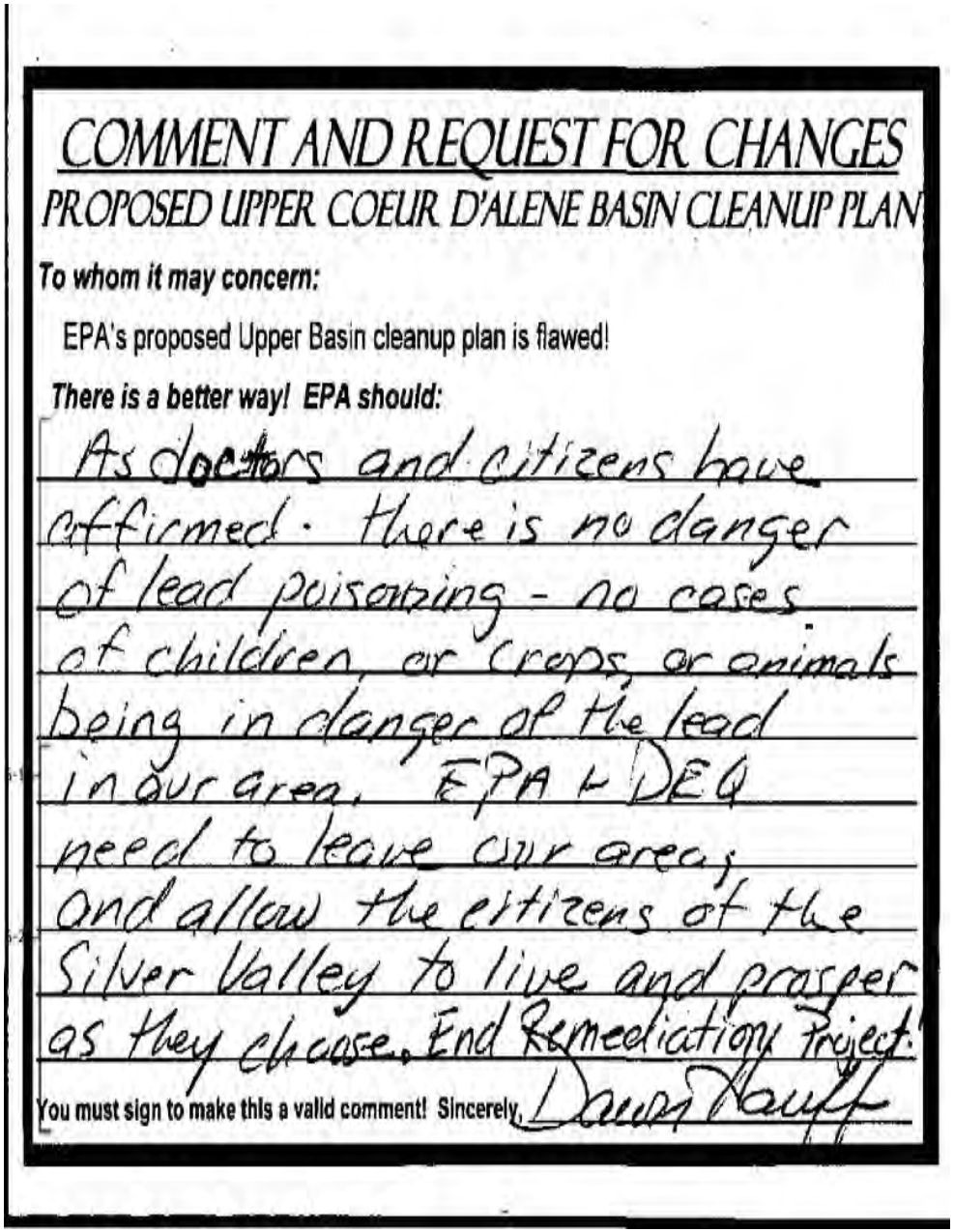
Response to comment I644-1

See response to Comment No. I351-1.

Response to comment I644-2

Comment noted.

Hauff, Dawn, I455, Letter 1308792



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

As doctors and citizens have affirmed - there is no danger of lead poisoning - no cases of children, or crops, or animals being in danger of the lead in our area. EPA + DEQ need to leave our area, and allow the citizens of the Silver Valley to live and prosper as they choose. End Remediation Project.

You must sign to make this a valid comment! Sincerely, Dawn Hauff

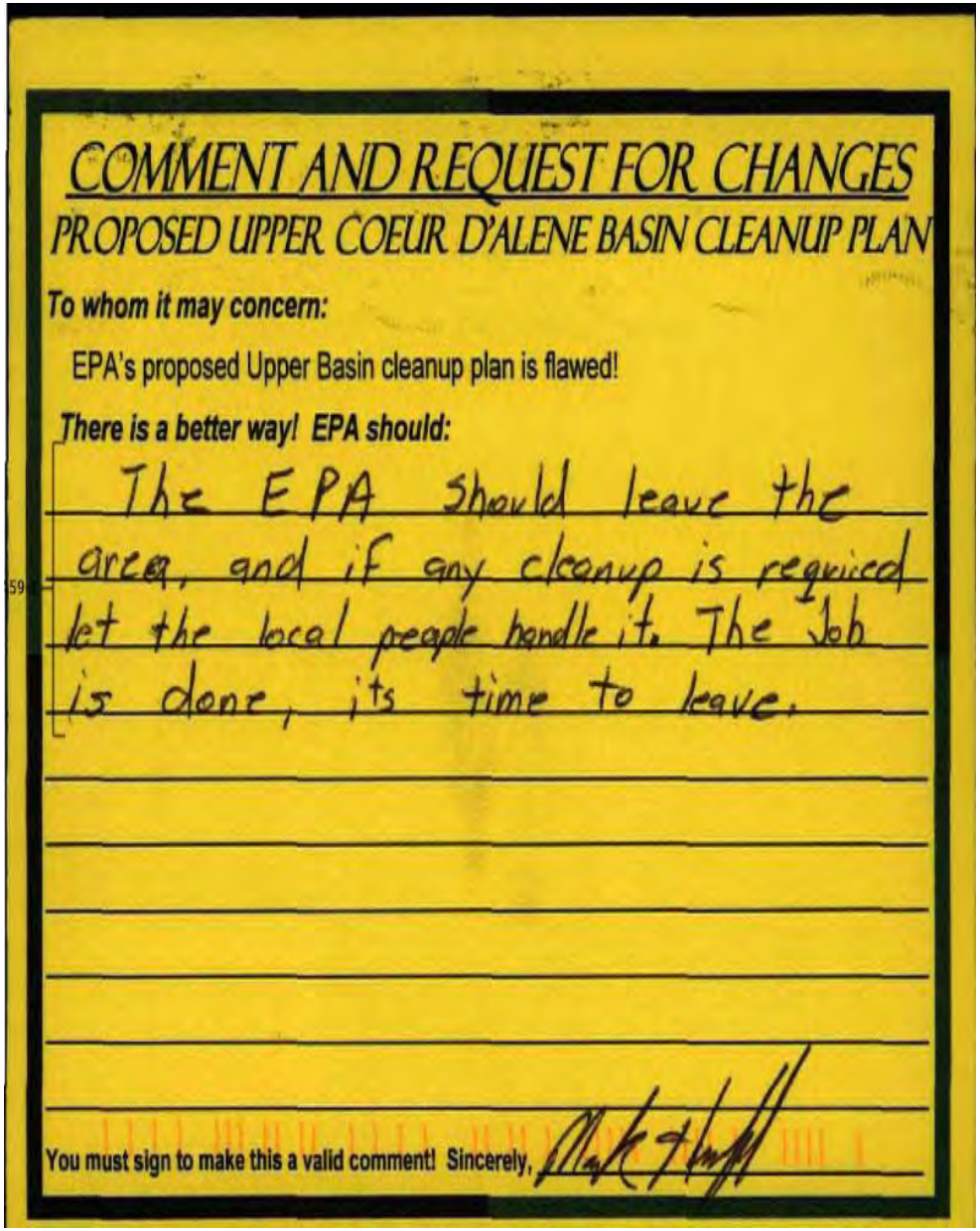
Response to comment I455-1

See response to Comment No. I295-1.

Response to comment I455-2

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. EPA's goal is to complete cleanup as quickly as possible and with minimum disruption.

Hauff, Mark, I459, Letter 1308796



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

The EPA should leave the area, and if any cleanup is required let the local people handle it. The Job is done, its time to leave.

459-1

You must sign to make this a valid comment! Sincerely, Mark Hauff

Response to comment I459-1

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate the cleanup plan and progress to the public.

Hayman, Marcy, I646, Letter 618255

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
marcyhayman@cebridge.net to: formsubmission 11/18/2010 07:44 PM
Sent by: Marcyhayman@Cebridge.Net <marcyhayman=cebridge.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: marcy hayman
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I646-1

I have a hard time believing that the federal goverment would be more concerned about the fish in the waters of Shoshone county than they are of the aged and disabled in the entire state of Idaho. The State of Idaho is facing a huge deficit in their budget this year yet the EPA is willing to spend billions of dollars to continue working on something they have been dawdling in for 30 years. Really?? Come on if you haven't solved the problem by now, are you really going to solve it over the course of the next 90 years? Sounds like the EPA wants to do what they want whenever they want with no state regulations to abide by. I think the moneys used to fund the EPA could certainly be useful other places in our federal goverment and could go along way in taking care of the great people of this great country as apposed to the fish.

I646-2

Coeur d'Alene Basin Resident: Yes
Email Address: marcyhayman@cebridge.net
Mailing Address: box 2065, 1233 E Larch|Osburn|ID|83849|US
Phone Number: (208) 752-4661

618255

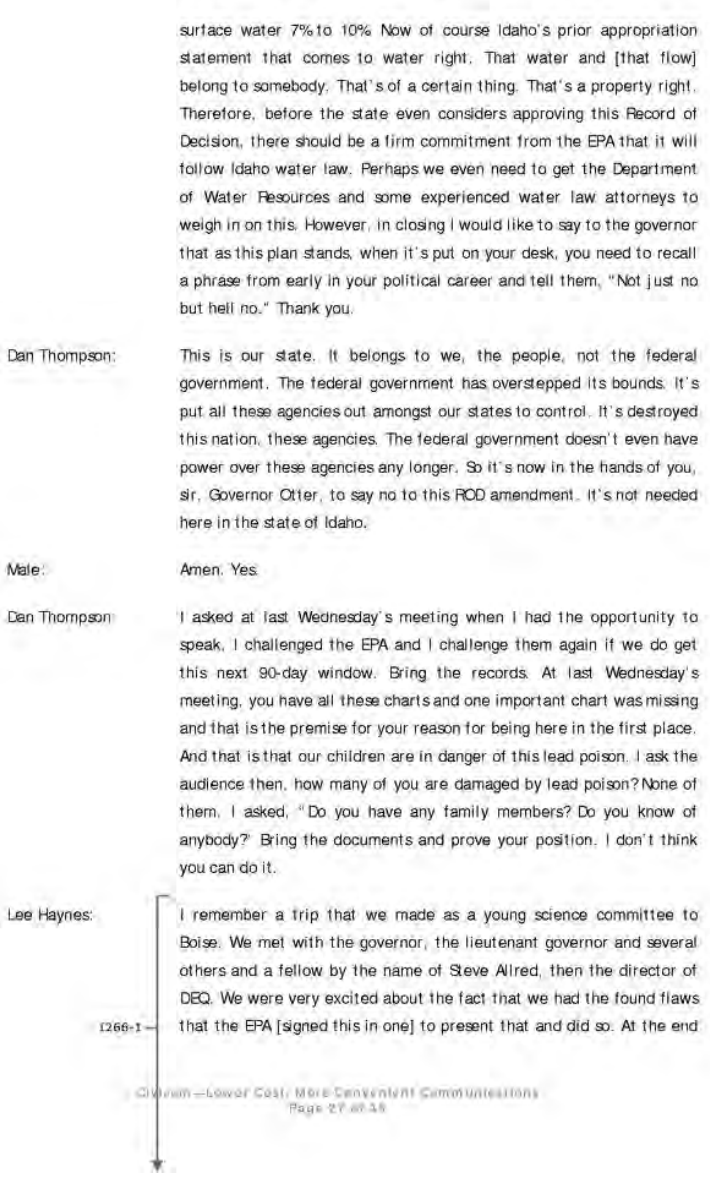
Response to comment I646-1

See response to Comment No. I351-1.

Response to comment I646-2

See responses to Comments No. 1295-1, 158-1, and I295-3.

Haynes, Lee, I266, Letter 616015-30



surface water 7% to 10% Now of course Idaho's prior appropriation statement that comes to water right. That water and [that flow] belong to somebody. That's of a certain thing. That's a property right. Therefore, before the state even considers approving this Record of Decision, there should be a firm commitment from the EPA that it will follow Idaho water law. Perhaps we even need to get the Department of Water Resources and some experienced water law attorneys to weigh in on this. However, in closing I would like to say to the governor that as this plan stands, when it's put on your desk, you need to recall a phrase from early in your political career and tell them, "Not just no but hell no." Thank you.

Dan Thompson: This is our state. It belongs to we, the people, not the federal government. The federal government has overstepped its bounds. It's put all these agencies out amongst our states to control. It's destroyed this nation, these agencies. The federal government doesn't even have power over these agencies any longer. So it's now in the hands of you, sir, Governor Otter, to say no to this ROD amendment. It's not needed here in the state of Idaho.

Male: Amen. Yes.

Dan Thompson: I asked at last Wednesday's meeting when I had the opportunity to speak, I challenged the EPA and I challenge them again if we do get this next 90-day window. Bring the records. At last Wednesday's meeting, you have all these charts and one important chart was missing and that is the premise for your reason for being here in the first place. And that is that our children are in danger of this lead poison. I ask the audience then, how many of you are damaged by lead poison? None of them. I asked, "Do you have any family members? Do you know of anybody?" Bring the documents and prove your position. I don't think you can do it.

Lee Haynes: I remember a trip that we made as a young science committee to Boise. We met with the governor, the lieutenant governor and several others and a fellow by the name of Steve Allred, then the director of DEQ. We were very excited about the fact that we had the found flaws that the EPA [signed this in one] to present that and did so. At the end

I266-1

Citizen – Lower Cost, More Convenient Communications
Page 27 of 34

Response to comment I266-1

Issues related to the methodologies used for the current site specific standards for surface water quality in the South Fork of the Coeur d'Alene River are not addressed by the Selected Remedy. The site-specific surface water quality standards for cadmium, lead, and zinc were developed by the State of Idaho (Idaho Administrative Procedures Act [IDAPA] 58.01.02.285). The site-specific criteria for lead and zinc are higher than the federal and state-wide criteria for protection of aquatic life, although they have been demonstrated to provide a comparable level of protectiveness within the SFCDR Watershed. The site-specific cadmium criterion is lower than the federal and state criteria.

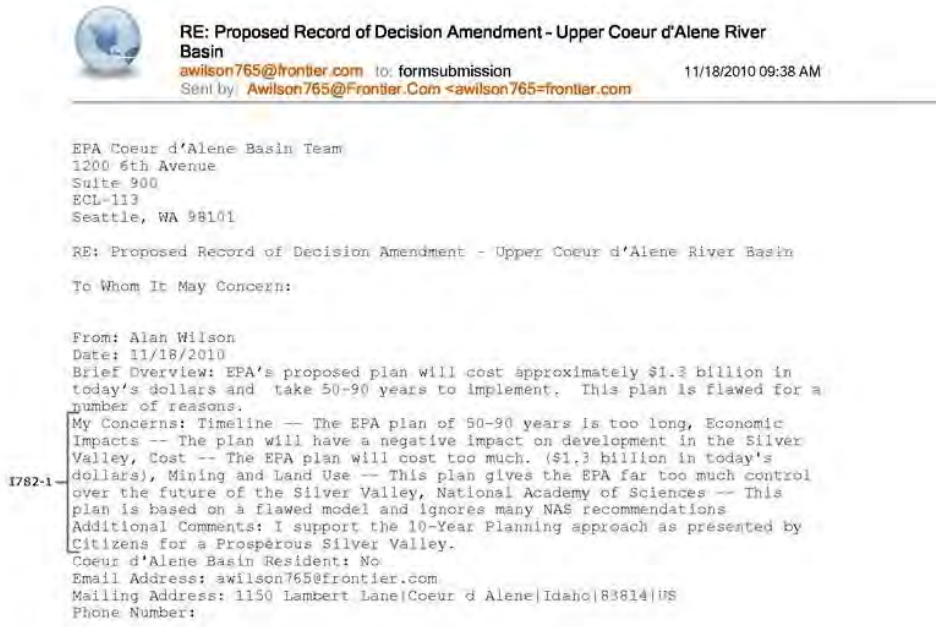
I266-1

of the meeting, Steve Allred said, "Basically science doesn't matter." Of course that ticked us all off because that's what we are. His point was it is mostly political, but I'd like to submit something tonight that maybe we haven't heard and it is from a scientific point of view. Years ago, our river right out here, the South Fork, was designated for water biota, Gold Book stand. That was also done through the EPA study, at the [Hale fish lab] for using, in my book, bogus water because they cooked it on the site. They didn't use real water from the river. They used nitrate and zinc, which [bile up] takes in the fish much more regularly than our native zinc. What I would submit is that the state of Idaho and our DEQs supposed to be working for us, asked for that study be revisited and look at site-specific criteria and see what our standards really are. They think our goals are totally off. We're trying to read something that really is impossible. EPA knows it. So if we could force that restudy, cite specific standards and the kind that Montana did, and I don't think there's a person in this room that would not support returning the river to its original condition, nothing better. Thank you.

Linda Wright: I live in Coeur d'Alene. I returned to Pinehurst in the 80s and 90s and I attended Wednesday's meeting in Smelterville for the fact finding mission. I've read and heard several times that night that public health is number one for the EPA. As I watched that meeting and all the residents and the stress level in that room, if public health is indeed number one, there it is. You're just going to have to back off because it's stress. Stress kills. We know that [laughter]. I did some research on it at the American Medical Association and the American Psychological Association. Both said that we all know that chronic emotional stress has negative impacts on our health. Chronic stress - and these people have been through this for years and years and years - it compromises the immune system and can cause major damage to health. It also reports really interestingly that stress is a control issue; all about the subjective response to loss of control. The people here feel they have lost control, that there is no way they can regain the control of their valley and their lives. Like I said, if indeed public health is number one for the EPA, it has to back off.

No comments

Wilson, Alan, I782, Letter 618783



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
awilson765@frontier.com to: formsubmission 11/18/2010 09:38 AM
Sent by: Awilson765@Frontier.Com <awilson765=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Alan Wilson
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: awilson765@frontier.com
Mailing Address: 1150 Lambert Lane|Coeur d Alene|Idaho|83814|US
Phone Number:

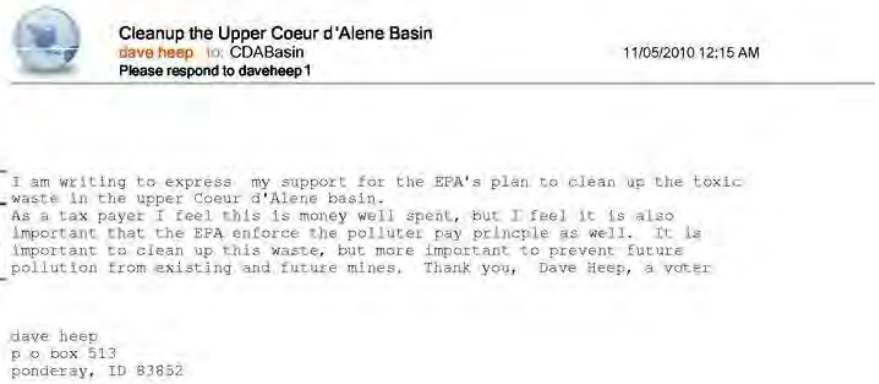
I782-1

618783

Response to comment I782-1

See response to Comment No. I351-1.

Heep, Dave, I301, Letter 614431



Cleanup the Upper Coeur d'Alene Basin
dave heep to: CDABasin 11/05/2010 12:15 AM
Please respond to daveheep1

I301-1 I am writing to express my support for the EPA's plan to clean up the toxic waste in the upper Coeur d'Alene basin.

I301-2 As a tax payer I feel this is money well spent, but I feel it is also important that the EPA enforce the polluter pay principle as well. It is important to clean up this waste, but more important to prevent future pollution from existing and future mines. Thank you, Dave Heep, a voter

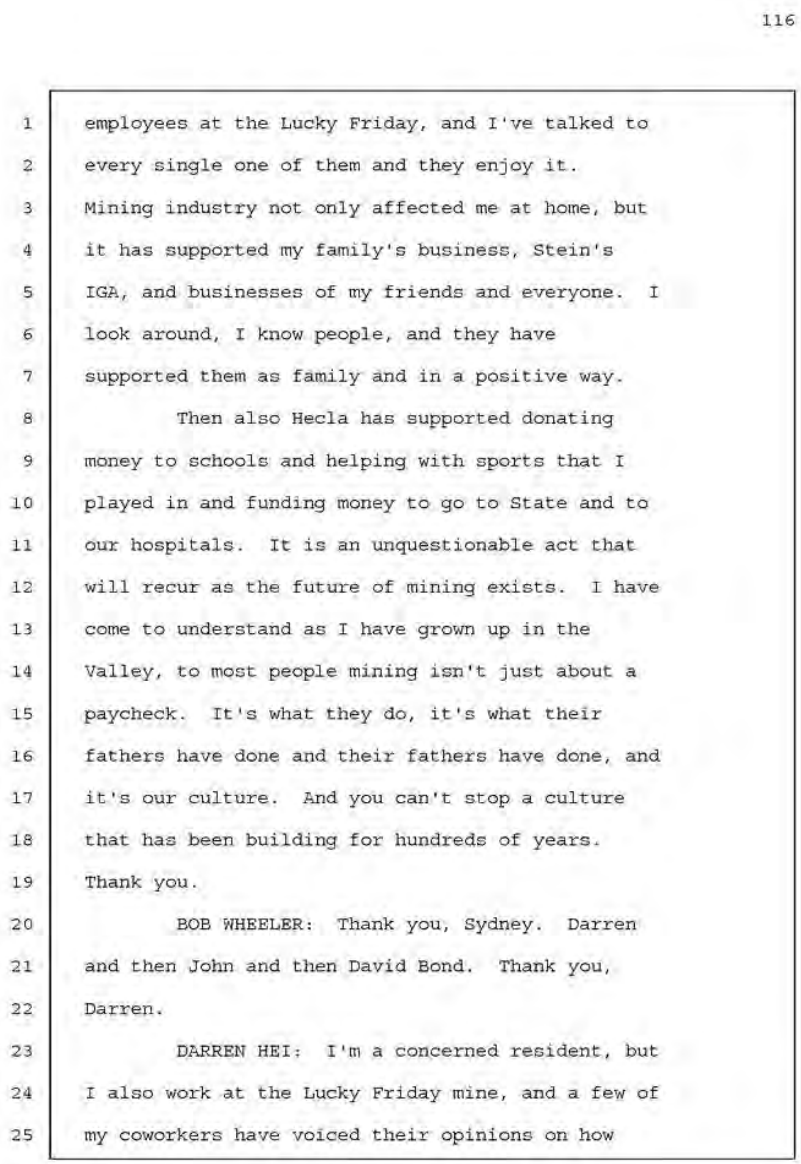
dave heep
p o box 513
ponderay, ID 83852

614431

Response to comment I301-1
Comment noted and appreciated.

Response to comment I301-2
See response to Comment No. I295-3.

Hei, Darren, I243, Letter 610097-38



116

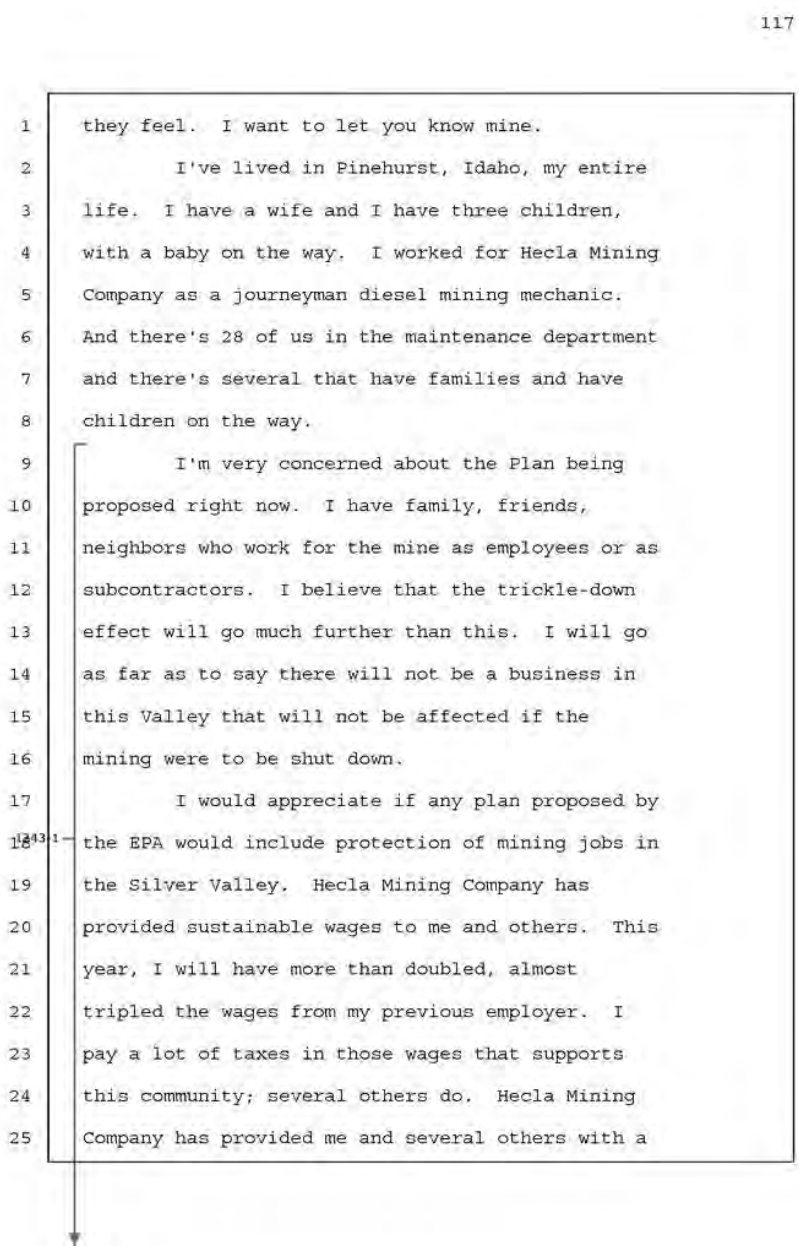
employees at the Lucky Friday, and I've talked to every single one of them and they enjoy it. Mining industry not only affected me at home, but it has supported my family's business, Stein's IGA, and businesses of my friends and everyone. I look around, I know people, and they have supported them as family and in a positive way.

Then also Hecla has supported donating money to schools and helping with sports that I played in and funding money to go to State and to our hospitals. It is an unquestionable act that will recur as the future of mining exists. I have come to understand as I have grown up in the Valley, to most people mining isn't just about a paycheck. It's what they do, it's what their fathers have done and their fathers have done, and it's our culture. And you can't stop a culture that has been building for hundreds of years. Thank you.

BOB WHEELER: Thank you, Sydney. Darren and then John and then David Bond. Thank you, Darren.

DARREN HEI: I'm a concerned resident, but I also work at the Lucky Friday mine, and a few of my coworkers have voiced their opinions on how

No comments



117

they feel. I want to let you know mine.

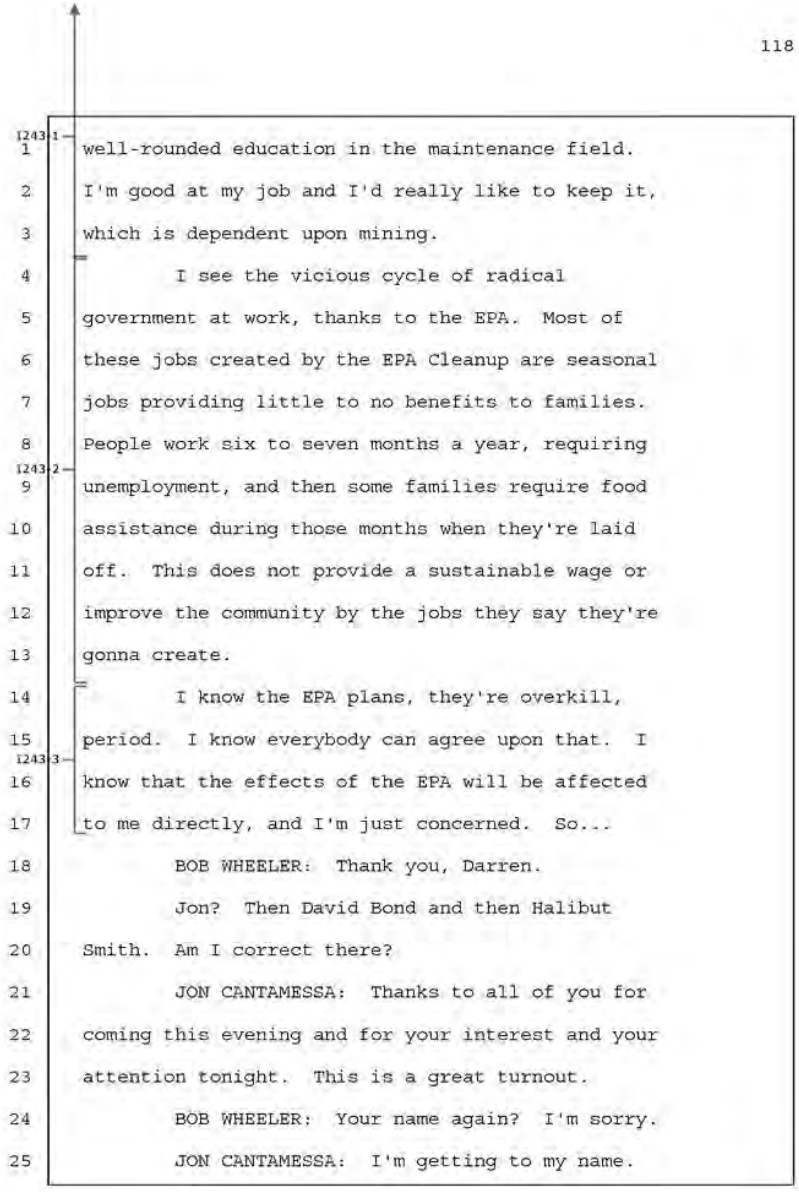
I've lived in Pinehurst, Idaho, my entire life. I have a wife and I have three children, with a baby on the way. I worked for Hecla Mining Company as a journeyman diesel mining mechanic. And there's 28 of us in the maintenance department and there's several that have families and have children on the way.

I'm very concerned about the Plan being proposed right now. I have family, friends, neighbors who work for the mine as employees or as subcontractors. I believe that the trickle-down effect will go much further than this. I will go as far as to say there will not be a business in this Valley that will not be affected if the mining were to be shut down.

I would appreciate if any plan proposed by I243-1 the EPA would include protection of mining jobs in the Silver Valley. Hecla Mining Company has provided sustainable wages to me and others. This year, I will have more than doubled, almost tripled the wages from my previous employer. I pay a lot of taxes in those wages that supports this community; several others do. Hecla Mining Company has provided me and several others with a

Response to comment I243-1

See response to Comment No. I58-5.



118

I243-1
well-rounded education in the maintenance field. I'm good at my job and I'd really like to keep it, which is dependent upon mining.

I see the vicious cycle of radical government at work, thanks to the EPA. Most of these jobs created by the EPA Cleanup are seasonal jobs providing little to no benefits to families. People work six to seven months a year, requiring

I243-2
unemployment, and then some families require food assistance during those months when they're laid off. This does not provide a sustainable wage or improve the community by the jobs they say they're gonna create.

I know the EPA plans, they're overkill, period. I know everybody can agree upon that. I

I243-3
know that the effects of the EPA will be affected to me directly, and I'm just concerned. So...

BOB WHEELER: Thank you, Darren.

Jon? Then David Bond and then Halibut Smith. Am I correct there?

JON CANTAMESSA: Thanks to all of you for coming this evening and for your interest and your attention tonight. This is a great turnout.

BOB WHEELER: Your name again? I'm sorry.

JON CANTAMESSA: I'm getting to my name.

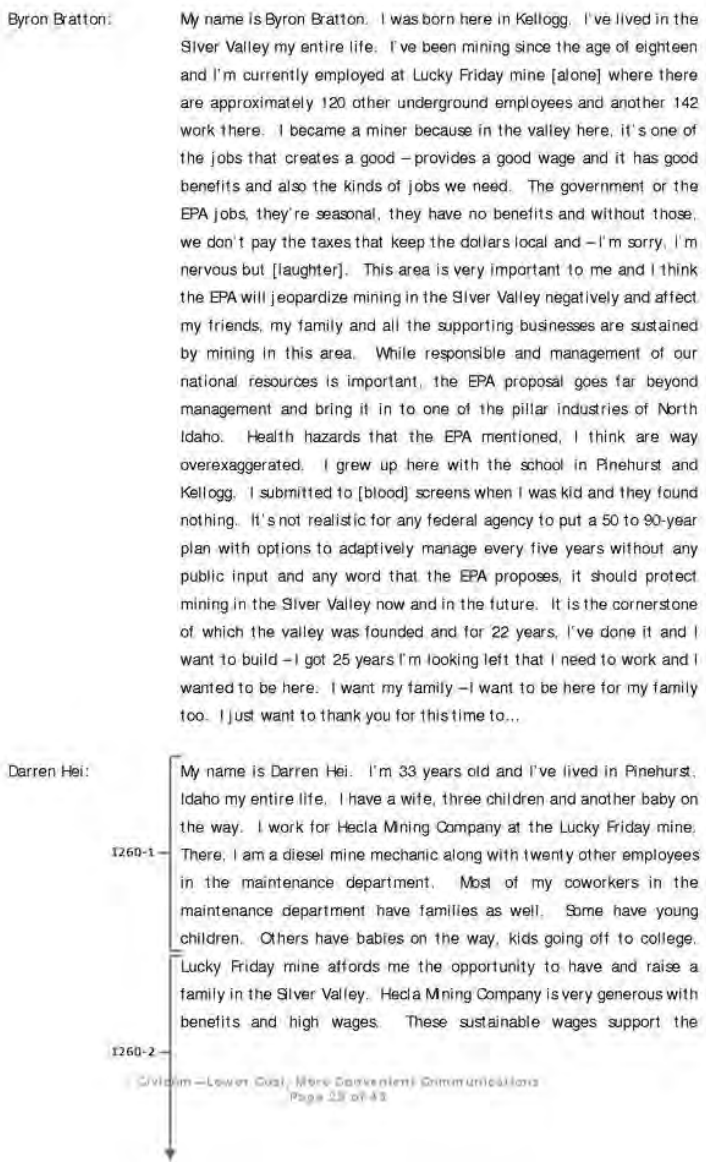
Response to comment I243-2

See response to Comment No. LC32-2.

Response to comment I243-3

Thank you for your comments. See response to Comment I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan.

Hei, Darren, I260, Letter 616015-23



Byron Bratton: My name is Byron Bratton. I was born here in Kellogg. I've lived in the Silver Valley my entire life. I've been mining since the age of eighteen and I'm currently employed at Lucky Friday mine [alone] where there are approximately 120 other underground employees and another 142 work there. I became a miner because in the valley here, it's one of the jobs that creates a good – provides a good wage and it has good benefits and also the kinds of jobs we need. The government or the EPA jobs, they're seasonal, they have no benefits and without those, we don't pay the taxes that keep the dollars local and – I'm sorry, I'm nervous but [laughter]. This area is very important to me and I think the EPA will jeopardize mining in the Silver Valley negatively and affect my friends, my family and all the supporting businesses are sustained by mining in this area. While responsible and management of our national resources is important, the EPA proposal goes far beyond management and bring it in to one of the pillar industries of North Idaho. Health hazards that the EPA mentioned, I think are way overexaggerated. I grew up here with the school in Pinehurst and Kellogg. I submitted to [blood] screens when I was kid and they found nothing. It's not realistic for any federal agency to put a 50 to 90-year plan with options to adaptively manage every five years without any public input and any word that the EPA proposes, it should protect mining in the Silver Valley now and in the future. It is the cornerstone of which the valley was founded and for 22 years, I've done it and I want to build – I got 25 years I'm looking left that I need to work and I wanted to be here. I want my family – I want to be here for my family too. I just want to thank you for this time to...

Darren Hei: My name is Darren Hei. I'm 33 years old and I've lived in Pinehurst, Idaho my entire life. I have a wife, three children and another baby on the way. I work for Hecla Mining Company at the Lucky Friday mine. I260-1 There, I am a diesel mine mechanic along with twenty other employees in the maintenance department. Most of my coworkers in the maintenance department have families as well. Some have young children. Others have babies on the way, kids going off to college. Lucky Friday mine affords me the opportunity to have and raise a family in the Silver Valley. Hecla Mining Company is very generous with benefits and high wages. These sustainable wages support the I260-2

Civilian – Lower Cost, More Convenient Communications
Page 23 of 43

Response to comment I260-1

Thank you for your comment.

Response to comment I260-2

See responses to Comment Nos. I58-5 and LC32-2.

I260-2

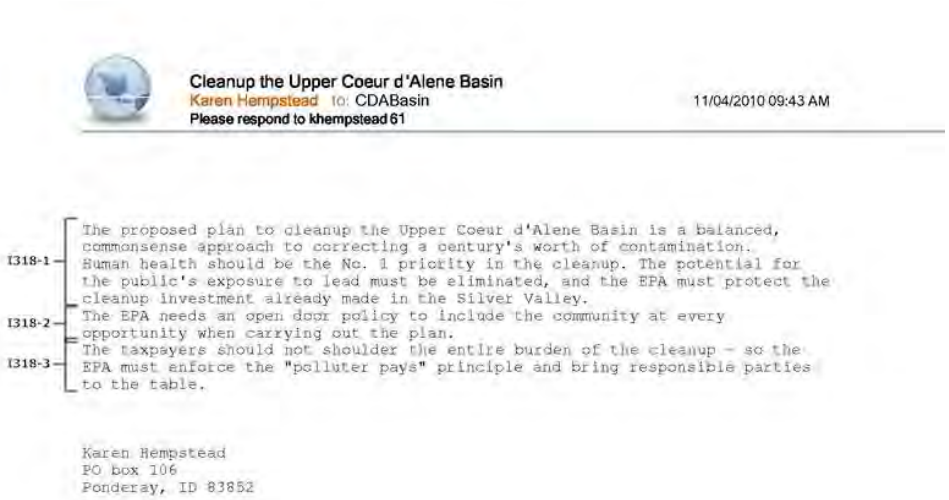
community in the [valley]. I've heard the proposal from EPA and the talk of creating more jobs. These jobs are good for kids going off to college and retired workers but don't provide stable growth for families who need benefits and year-round work. The Silver Valley needs mining jobs and protection for its present and future mining jobs against the plan being proposed by the EPA. I'll ask you for this protection and so many of our livelihoods. Thank you for allowing me to express my concern.

Charles Catteau: I'm Charles Catteau. I was born and raised here in Kellogg, Idaho and I worked in the mines. I worked at ASARCO's [paved] mine. I worked at Hecla Star mine and the last mine I worked at was the Lucky Friday for Hecla. After that, I went to work for GE for 37.5 years. I left this valley in 1972. I came back in 2005. During that time, I observed from afar, sometimes halfway around the world basically, the de-industrialization of this entire region, Eastern Washington, Northern Idaho, Western Montana. I wondered at that time who and what was behind it, some [of those] regulations which were definitely needed. Others were just – seemed to be more of a fiat and just things that seem to happen but the end-result was the loss of many, many good-paying jobs. The jobs that we had when I was here were summertime-type jobs. I thank Hecla. I thank Bunker and the rest of those for providing those. However, the people who have to be here and make a living the year-round are the ones that are most important in this. Now, the other thing is what I saw from this meeting last week was that it just seems to be a lot of lack of planning, lack of specific planning on the part of the EPA to do all this remediation and then not protected from claims like a 100-year flood, okay? One little last quick thing, if you could see the pictures that I saw which I do not have any copies of anymore because the relatives took it, of the 1933 flood and see the railroad bridge coming down in the South Fork and Kellogg split completely by this, you would understand what they're talking about when they're saying 100-year floods.

Raymond Pollard: ...talk about another valley in this country that's being devastated by the EPA is the San Joaquin Valley in California because of the three-inch fish, the delta smelt, there are thousands of people out of work

No comments

Hempstead, Karen, I318, Letter 614448



Cleanup the Upper Coeur d'Alene Basin
Karen Hempstead To: CDABasin 11/04/2010 09:43 AM
Please respond to khempstead 61

I318-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I318-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I318-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Karen Hempstead
PO box 106
Ponderay, ID 83852

614448

Response to comment I318-1

See response to Comment No. I295-1.

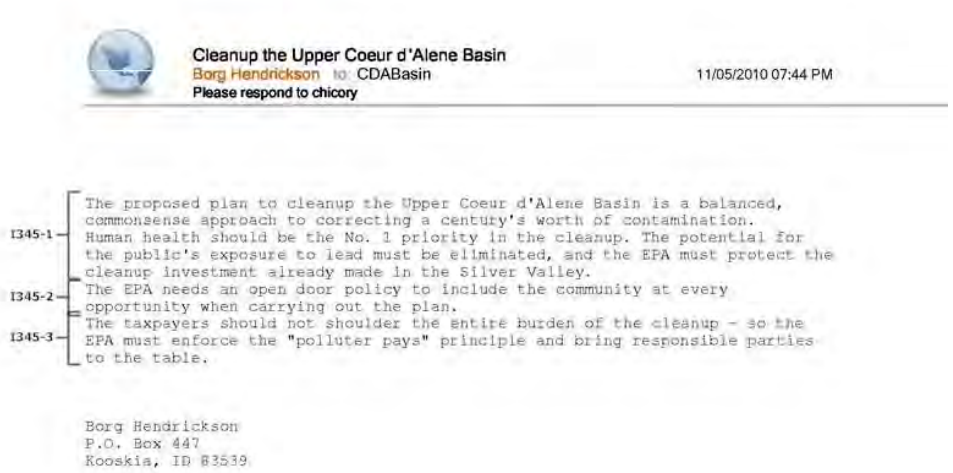
Response to comment I318-2

See response to Comment No. I295-2.

Response to comment I318-3

See response to Comment No. I295-3.

Hendrickson, Borg, I345, Letter 614475



Cleanup the Upper Coeur d'Alene Basin
Borg Hendrickson to: CDABasin 11/05/2010 07:44 PM
Please respond to chicory

I345-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I345-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I345-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Borg Hendrickson
P.O. Box 447
Kooskia, ID 83539

614475

Response to comment I345-1

See response to Comment No. I295-1.

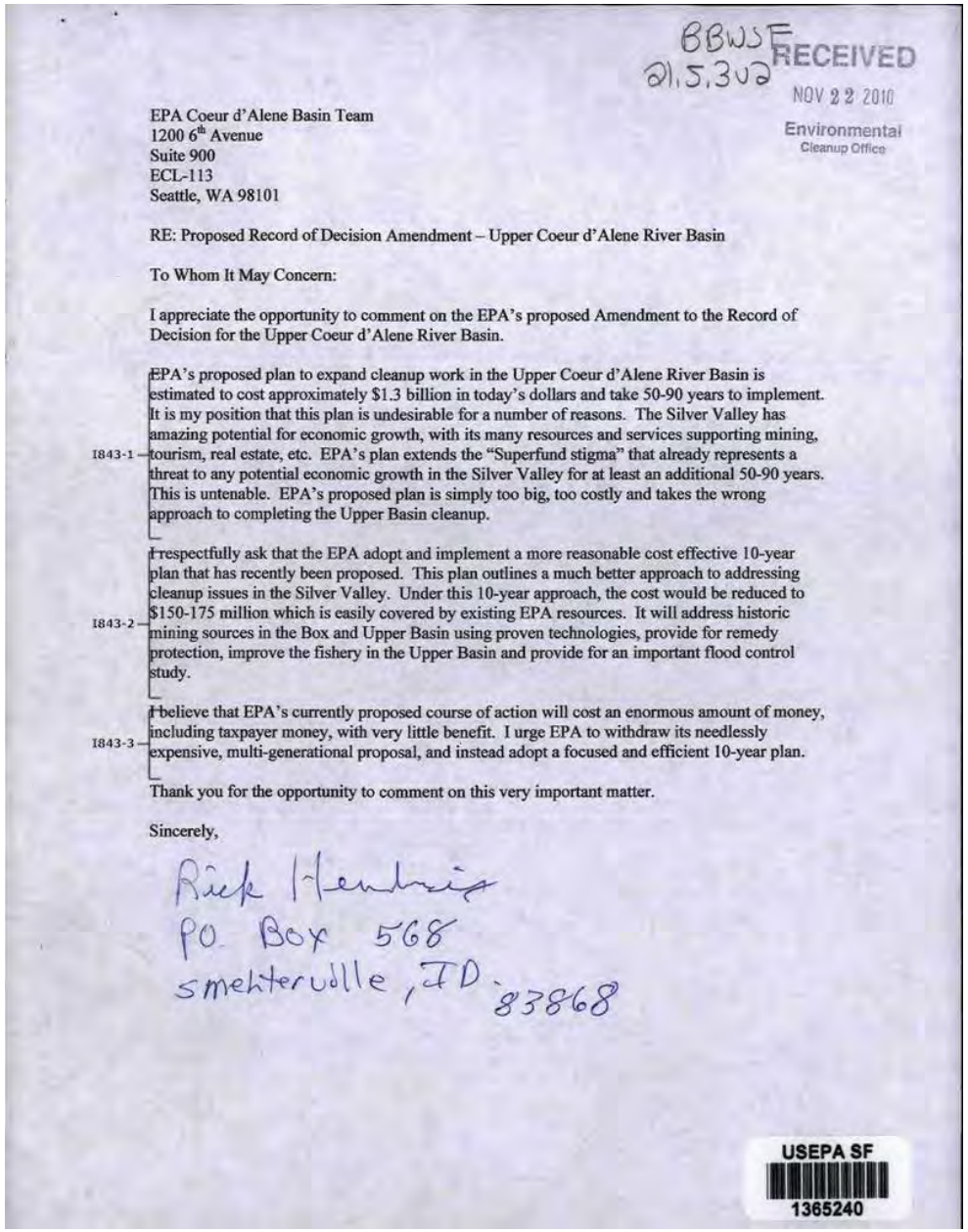
Response to comment I345-2

See response to Comment No. I295-2.

Response to comment I345-3

See response to Comment No. I295-3.

Hendrix, Rick, I843, Letter 1365240



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NOV 22 2010
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Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I843-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I843-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I843-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Rick Hendrix
PO Box 568
Smelterville, ID 83868

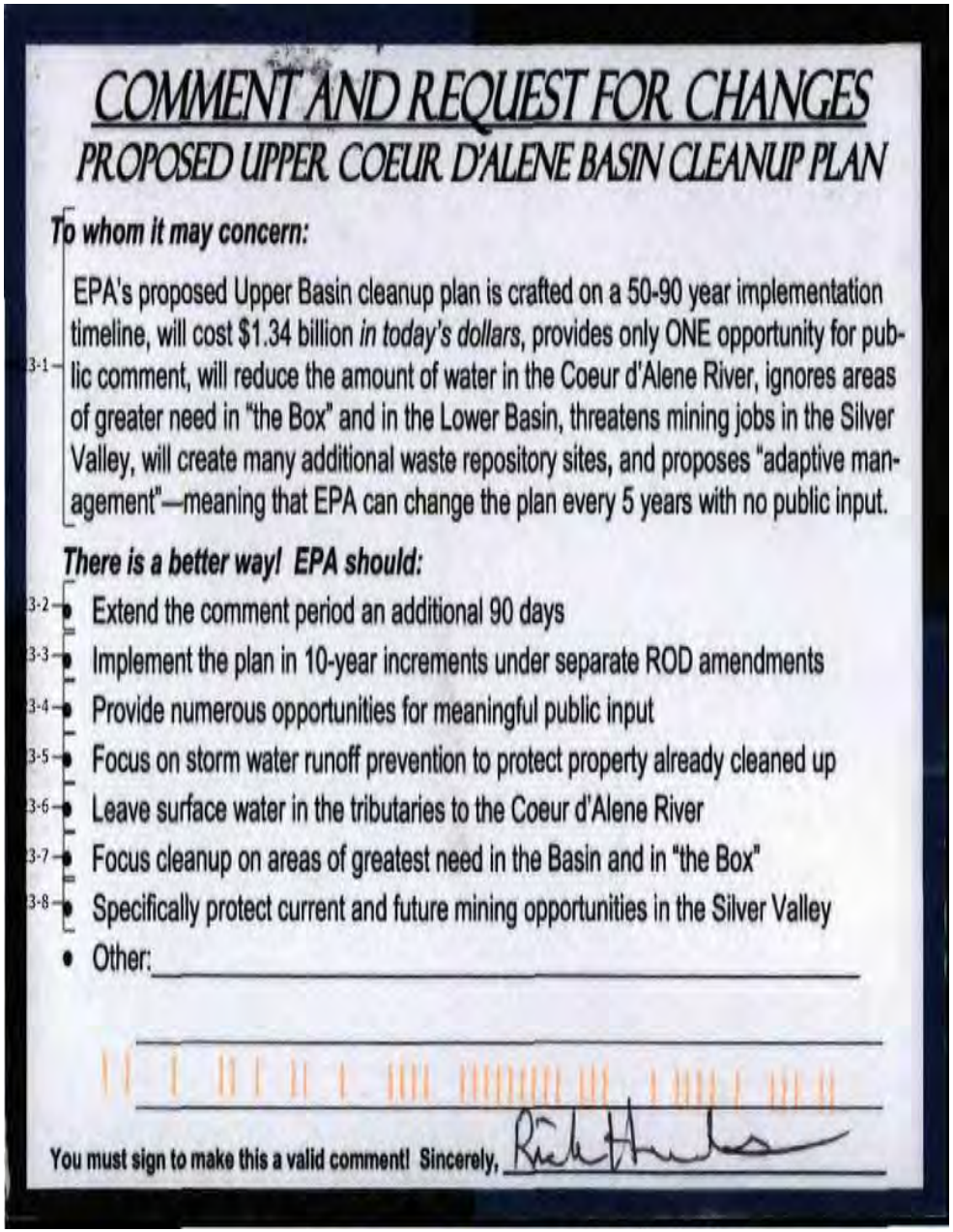
USEPA SF
1365240

Response to comment I843-1
See response to Comment No. I474-1.

Response to comment I843-2
See response to Comment No. I474-2.

Response to comment I843-3
See response to Comment No. I474-3.

Hendrix, Rick, I523, Letter 1357785



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I23-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I23-2 Extend the comment period an additional 90 days
- I23-3 Implement the plan in 10-year increments under separate ROD amendments
- I23-4 Provide numerous opportunities for meaningful public input
- I23-5 Focus on storm water runoff prevention to protect property already cleaned up
- I23-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I23-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I23-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Rick Hendrix

Response to comment I523-1
See response to Comment No. I25-1.

Response to comment I523-2
See response to Comment No. I25-2.

Response to comment I523-3
See response to Comment No. I25-3.

Response to comment I523-4
See response to Comment No. I25-4.

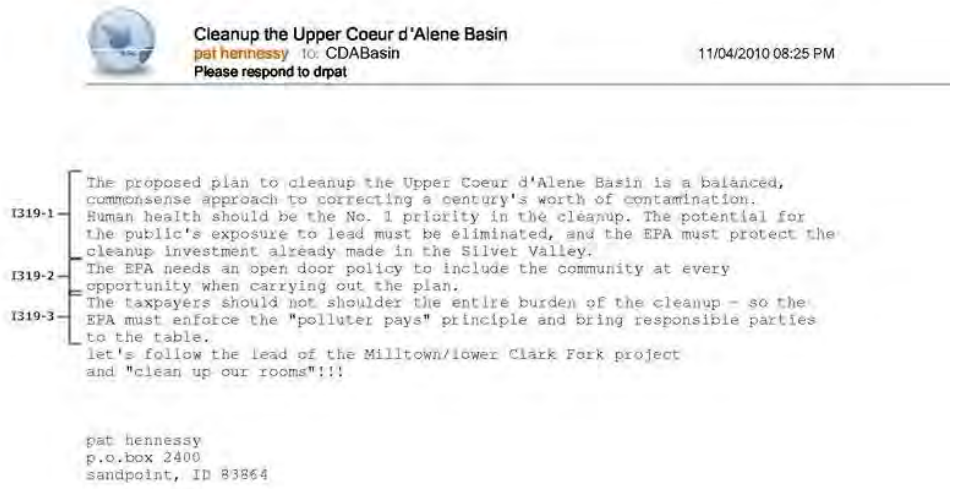
Response to comment I523-5
See response to Comment No. I25-5.

Response to comment I523-6
See response to Comment No. I25-6.

Response to comment I523-7
See response to Comment No. I25-7.

Response to comment I523-8
See response to Comment No. I25-8.

Hennessy, Pat, I319, Letter 614449



Cleanup the Upper Coeur d'Alene Basin
pat hennessy to: CDABasin 11/04/2010 08:25 PM
Please respond to drpat

I319-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I319-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I319-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

let's follow the lead of the Milltown/lower Clark Fork project and "clean up our rooms"!!!

pat hennessy
p.o.box 2400
sandpoint, ID 83864

614449

Response to comment I319-1

See response to Comment No. I295-1.

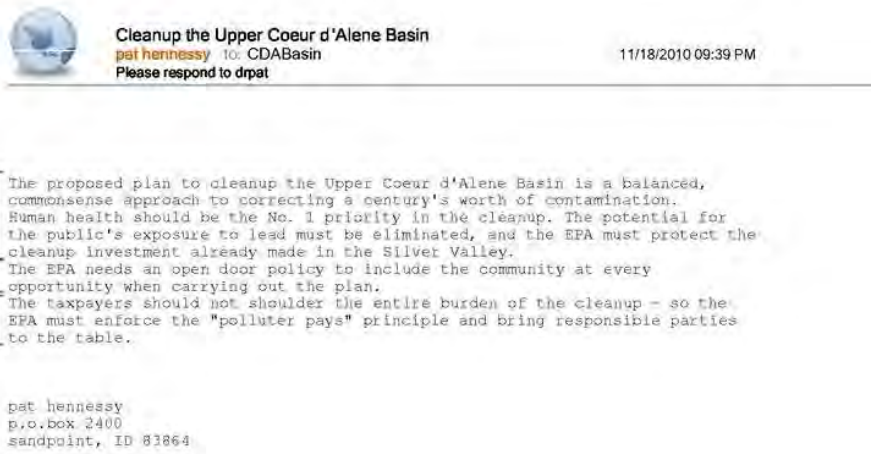
Response to comment I319-2

See response to Comment No. I295-2.

Response to comment I319-3

See response to Comment No. I295-3.

Hennessy, Pat, I648, Letter 618258



Cleanup the Upper Coeur d'Alene Basin
pat hennessy to: CDABasin 11/18/2010 09:39 PM
Please respond to drpat

I648-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I648-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I648-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

pat hennessy
p.o.box 2400
sandpoint, ID 83864

618258

Response to comment I648-1

See response to Comment No. I295-1.

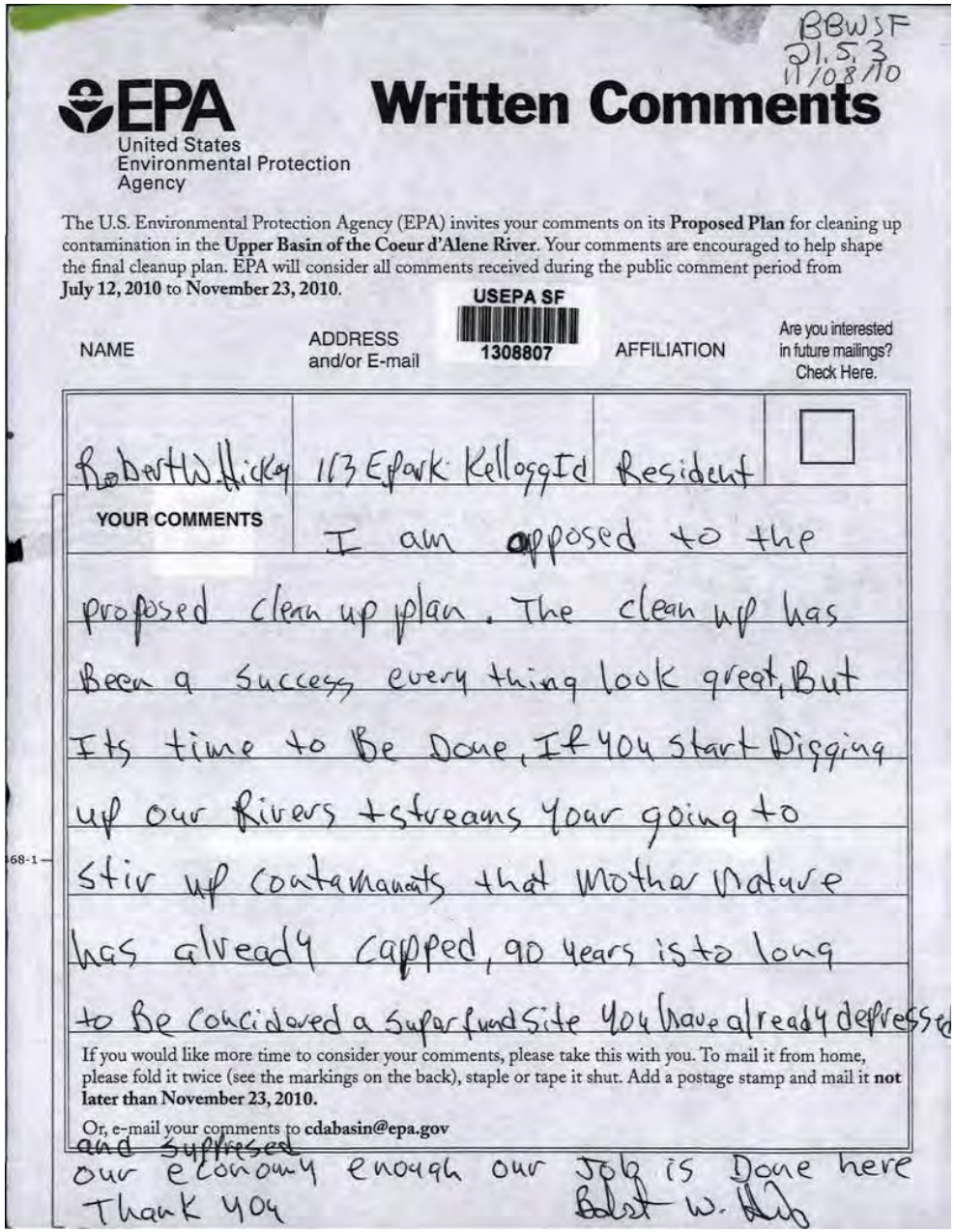
Response to comment I648-2

See response to Comment No. I295-2.

Response to comment I648-3

See response to Comment No. I295-3.

Hickey, Robert W., I468, Letter 1308807



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11/08/10

EPA United States Environmental Protection Agency

Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **November 23, 2010**.

USEPA SF 1308807

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
RoBerth W. Hickey	113 E fork Kellogg Id	Resident	☐

YOUR COMMENTS

I am opposed to the proposed clean up plan. The clean up has Been a success every thing look great, But Its time to Be Done, If you start Digging up our Rivers + streams your going to stir up contamanats that Mother Nature has already capped, 90 years is to long to Be concidered a Superfund Site you have already depressed and Suppresed our economy enough our Job is Done here Thank you

Robert W. Hickey

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than November 23, 2010.**

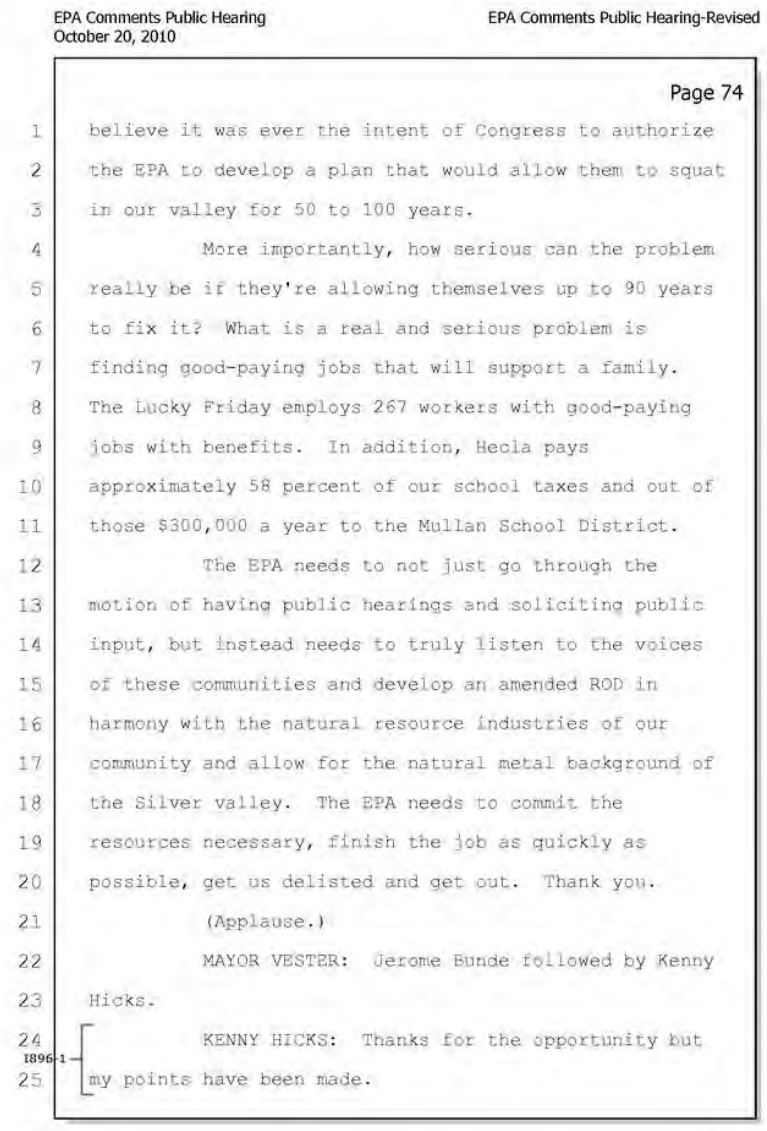
Or, e-mail your comments to **cdabasin@epa.gov**

I468-1

Response to comment I468-1

See responses to Comment Nos. I58-1 and I54-2.

Hicks, Kenny, I896, Letter 619651-30



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 74

believe it was ever the intent of Congress to authorize the EPA to develop a plan that would allow them to squat in our valley for 50 to 100 years.

More importantly, how serious can the problem really be if they're allowing themselves up to 90 years to fix it? What is a real and serious problem is finding good-paying jobs that will support a family. The Lucky Friday employs 267 workers with good-paying jobs with benefits. In addition, Hecla pays approximately 58 percent of our school taxes and out of those $300,000 a year to the Mullan School District.

The EPA needs to not just go through the motion of having public hearings and soliciting public input, but instead needs to truly listen to the voices of these communities and develop an amended ROD in harmony with the natural resource industries of our community and allow for the natural metal background of the Silver valley. The EPA needs to commit the resources necessary, finish the job as quickly as possible, get us delisted and get out. Thank you.

(Applause.)

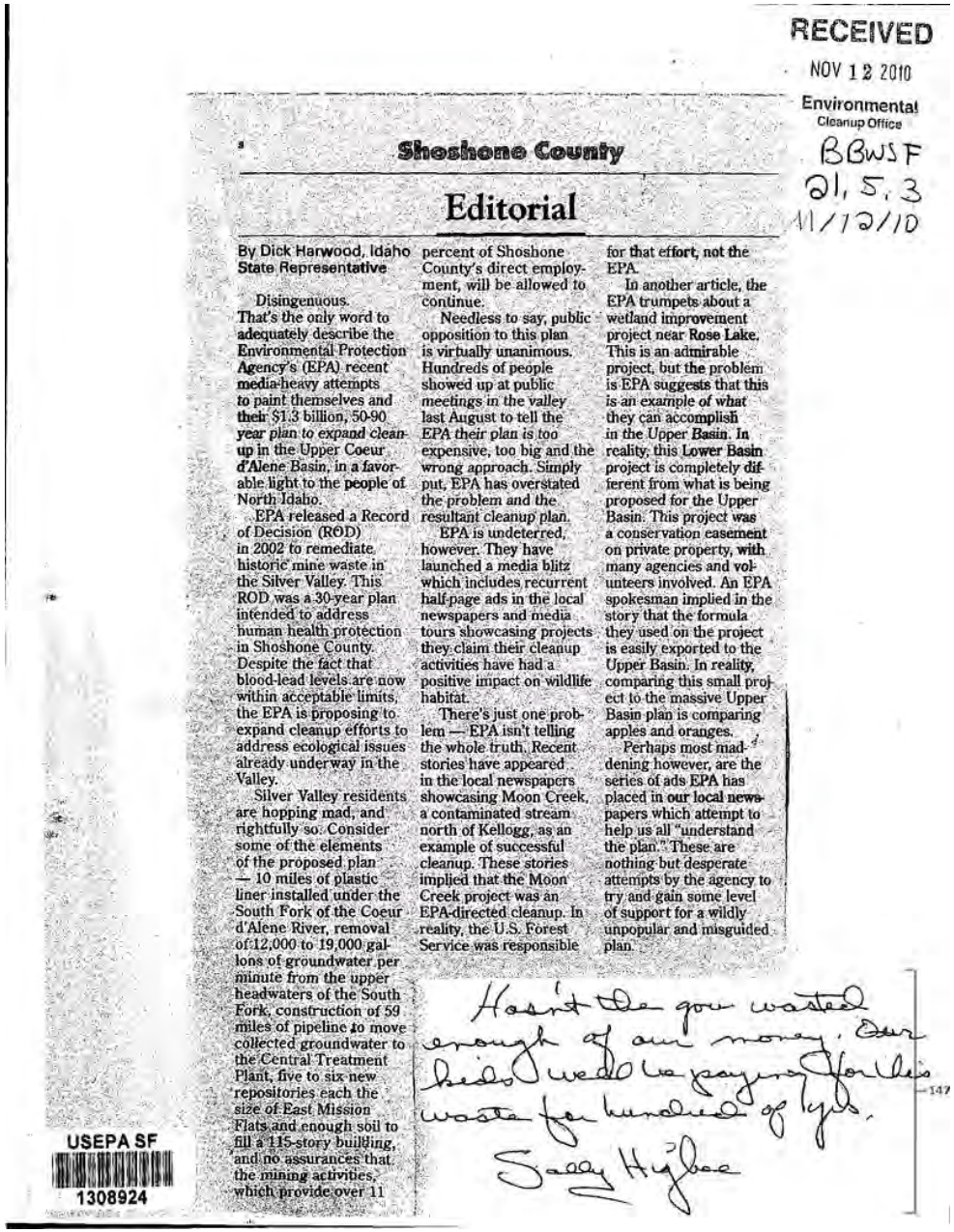
MAYOR VESTER: Jerome Bunde followed by Kenny Hicks.

KENNY HICKS: Thanks for the opportunity but my points have been made. I896-1

Response to comment I896-1

Thank you for your comment.

Higbee, Sally, I471, Letter 1308924



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NOV 12 2010
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Cleanup Office
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21, 5, 3
11/12/10

Shoshone County

Editorial

By Dick Harwood, Idaho State Representative

Disingenuous. That's the only word to adequately describe the Environmental Protection Agency's (EPA) recent media-heavy attempts to paint themselves and their $1.3 billion, 50-90 year plan to expand clean-up in the Upper Coeur d'Alene Basin, in a favorable light to the people of North Idaho.

EPA released a Record of Decision (ROD) in 2002 to remediate historic mine waste in the Silver Valley. This ROD was a 30-year plan intended to address human health protection in Shoshone County. Despite the fact that blood-lead levels are now within acceptable limits, the EPA is proposing to expand cleanup efforts to address ecological issues already underway in the Valley.

Silver Valley residents are hopping mad, and rightfully so. Consider some of the elements of the proposed plan — 10 miles of plastic liner installed under the South Fork of the Coeur d'Alene River, removal of 12,000 to 19,000 gallons of groundwater per minute from the upper headwaters of the South Fork, construction of 59 miles of pipeline to move collected groundwater to the Central Treatment Plant, five to six new repositories each the size of East Mission Flats and enough soil to fill a 115-story building, and no assurances that the mining activities, which provide over 11 percent of Shoshone County's direct employment, will be allowed to continue.

Needless to say, public opposition to this plan is virtually unanimous. Hundreds of people showed up at public meetings in the valley last August to tell the EPA their plan is too expensive, too big and the wrong approach. Simply put, EPA has overstated the problem and the resultant cleanup plan.

EPA is undeterred, however. They have launched a media blitz which includes recurrent half-page ads in the local newspapers and media tours showcasing projects they claim their cleanup activities have had a positive impact on wildlife habitat.

There's just one problem — EPA isn't telling the whole truth. Recent stories have appeared in the local newspapers showcasing Moon Creek, a contaminated stream north of Kellogg, as an example of successful cleanup. These stories implied that the Moon Creek project was an EPA-directed cleanup. In reality, the U.S. Forest Service was responsible for that effort, not the EPA.

In another article, the EPA trumpets about a wetland improvement project near Rose Lake. This is an admirable project, but the problem is EPA suggests that this is an example of what they can accomplish in the Upper Basin. In reality, this Lower Basin project is completely different from what is being proposed for the Upper Basin. This project was a conservation easement on private property, with many agencies and volunteers involved. An EPA spokesman implied in the story that the formula they used on the project is easily exported to the Upper Basin. In reality, comparing this small project to the massive Upper Basin plan is comparing apples and oranges.

Perhaps most maddening however, are the series of ads EPA has placed in our local newspapers which attempt to help us all "understand the plan." These are nothing but desperate attempts by the agency to try and gain some level of support for a wildly unpopular and misguided plan.

Hasn't the gov wasted enough of our money. Our kids + we do not want to pay for this waste for hundreds of yrs.
Sally Higbee
147

USEPA SF
1308924

Response to comment I471-1

Please see response to Comment No. I58-2.

Higbee, Thomas, I472, Letter 1308925

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21.5.3

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NOV 12 2010
Environmental Cleanup Office

Shoshone County

Editorial

By Dick Harwood, Idaho State Representative

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The E.P.A. is just like the Endangered Species Act, Nothing matters to them. The E.P.A. signed a agreement with the Mining Company's to limit clean up to a 10 square mile. From this to what they have now is completely different.

Thomas E Higbee 16582 S. Latour Crk. Cataldo, Idaho 83810

USEPA SF
1308925

Response to comment I472-1

There was no such agreement to limit EPA's authority to the Box. The mining companies challenged in court EPA's authority to use remedial authorities outside of the Box. EPA prevailed in this action and the court found EPA's authority did extend outside the Box.

Higdem, Jan, I270, Letter 616015-34

had to give up coaching baseball. You know why? We didn't have any kids. The EPA ran them out of this valley. They scared so many people, "Oh, there's lead in the water. Don't walk here. Don't step off the path." They told so many visitors that we lost some people coming in here to visit our land. Well, I kind of got sick and tired of that. I'm sick and tired of it now. A lot of people think that we could get another 90 days. I got something to read to you. "We're pretty well fed up gentlemen. Now while I don't speak for all the so-called lead-retarded people in this valley [laughter], I sure echo a lot of thinking ones. We don't want them. We don't need them. Thank you for what you've done. It's a very nice-looking valley now but you haven't solved any health problem, because there wasn't any? Don't forget, retarded votes count [laughter] and vote this year."

Jane Higdem: I'm Jane Higdem. I'm the national president of Women in Mining; 170 women. I'm also one of three Republican delegates for legislative district two, covering five counties. I also own business, some clothing made with pure silver and that I recently, due to lack of sales and my suppliers going out of business, I had to fire myself. Most of the topics that I will be covering tonight will be – I want to hit on the issue of basically the EPA making up its own rules and changing them as they feel. The EPA has limits on the maximum [mineral] contamination that they can discharge. If it's over by some little fraction like .1, they assess a fine to the mining company. If it's over by .2 they assess a fine. They don't have that I can find anywhere, any guidelines or standards for how much does this charge –how much this .1, how much that would cost the company or this. They just kind of make it up as they go and if you don't like it then you can argue it and spend lots of lawyer money, but basically not friendly to mining. If they say they are, how can a mine company stay alive when they fine them to death? Thank you.

I270-1

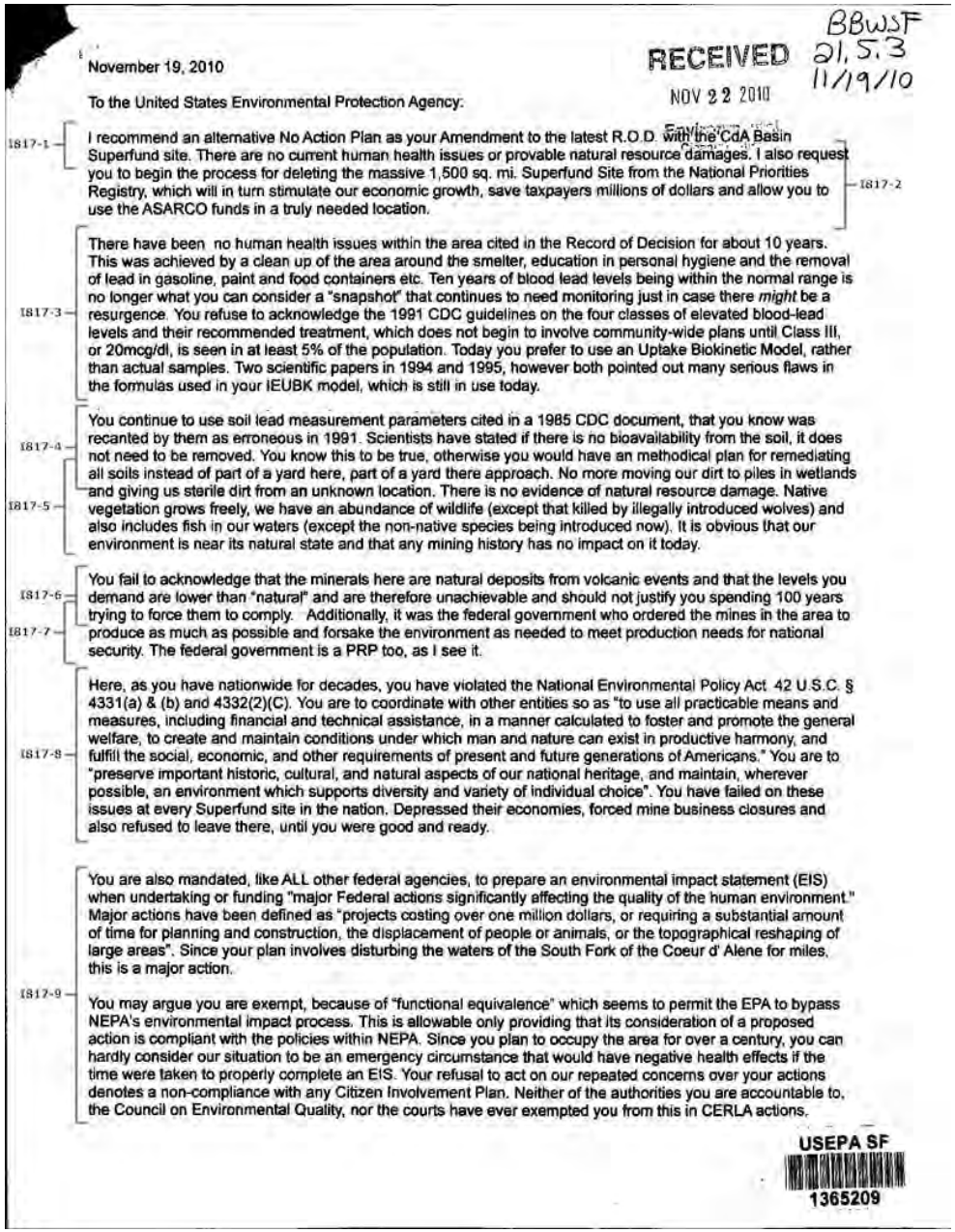
Steve Petroni: Good evening. My name is Steve Petroni. I'm Hecla's Silver Valley exploration manager. I'd like to thank the panel for allowing me to present my views tonight. My comments this evening focus on portions of the plan that makes me most nervous about the future of exploration in mining in the Silver Valley. In EPA's cover letter in the proposed plan, they stated and I quote, "EPA has worked with Hecla

Liscom—Lower Cost, More Convenient Communications
Page 30 of 45

Response to comment I270-1

The Selected Remedy selected in the Upper Basin ROD Amendment addresses historical mining contamination and not current mining operations.

Higdem, Jann, I817, Letter 1365209



November 19, 2010

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To the United States Environmental Protection Agency:

I817-1 I817-2 I recommend an alternative No Action Plan as your Amendment to the latest R.O.D. with the CdA Basin Superfund site. There are no current human health issues or provable natural resource damages. I also request you to begin the process for deleting the massive 1,500 sq. mi. Superfund Site from the National Priorities Registry, which will in turn stimulate our economic growth, save taxpayers millions of dollars and allow you to use the ASARCO funds in a truly needed location.

I817-3 There have been no human health issues within the area cited in the Record of Decision for about 10 years. This was achieved by a clean up of the area around the smelter, education in personal hygiene and the removal of lead in gasoline, paint and food containers etc. Ten years of blood lead levels being within the normal range is no longer what you can consider a "snapshot" that continues to need monitoring just in case there *might* be a resurgence. You refuse to acknowledge the 1991 CDC guidelines on the four classes of elevated blood-lead levels and their recommended treatment, which does not begin to involve community-wide plans until Class III, or 20mcg/dl, is seen in at least 5% of the population. Today you prefer to use an Uptake Biokinetic Model, rather than actual samples. Two scientific papers in 1994 and 1995, however both pointed out many serious flaws in the formulas used in your IEUBK model, which is still in use today.

I817-4 I817-5 You continue to use soil lead measurement parameters cited in a 1985 CDC document, that you know was recanted by them as erroneous in 1991. Scientists have stated if there is no bioavailability from the soil, it does not need to be removed. You know this to be true, otherwise you would have an methodical plan for remediating all soils instead of part of a yard here, part of a yard there approach. No more moving our dirt to piles in wetlands and giving us sterile dirt from an unknown location. There is no evidence of natural resource damage. Native vegetation grows freely, we have an abundance of wildlife (except that killed by illegally introduced wolves) and also includes fish in our waters (except the non-native species being introduced now). It is obvious that our environment is near its natural state and that any mining history has no impact on it today.

I817-6 I817-7 You fail to acknowledge that the minerals here are natural deposits from volcanic events and that the levels you demand are lower than "natural" and are therefore unachievable and should not justify you spending 100 years trying to force them to comply. Additionally, it was the federal government who ordered the mines in the area to produce as much as possible and forsake the environment as needed to meet production needs for national security. The federal government is a PRP too, as I see it.

I817-8 Here, as you have nationwide for decades, you have violated the National Environmental Policy Act 42 U.S.C. § 4331(a) & (b) and 4332(2)(C). You are to coordinate with other entities so as "to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." You are to "preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice". You have failed on these issues at every Superfund site in the nation. Depressed their economies, forced mine business closures and also refused to leave there, until you were good and ready.

I817-9 You are also mandated, like ALL other federal agencies, to prepare an environmental impact statement (EIS) when undertaking or funding "major Federal actions significantly affecting the quality of the human environment." Major actions have been defined as "projects costing over one million dollars, or requiring a substantial amount of time for planning and construction, the displacement of people or animals, or the topographical reshaping of large areas". Since your plan involves disturbing the waters of the South Fork of the Coeur d' Alene for miles, this is a major action.

You may argue you are exempt, because of "functional equivalence" which seems to permit the EPA to bypass NEPA's environmental impact process. This is allowable only providing that its consideration of a proposed action is compliant with the policies within NEPA. Since you plan to occupy the area for over a century, you can hardly consider our situation to be an emergency circumstance that would have negative health effects if the time were taken to properly complete an EIS. Your refusal to act on our repeated concerns over your actions denotes a non-compliance with any Citizen Involvement Plan. Neither of the authorities you are accountable to, the Council on Environmental Quality, nor the courts have ever exempted you from this in CERLA actions.

USEPA SF
1365209

Response to comment I817-1

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to addressing these unacceptable risks.

Response to comment I817-2

EPA and other agencies have done many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Response to comment I817-3

Regarding human health risk, see response to I295-1. For more information on the use of the IEUBK model, please see the 2002 ROD, Part 3, Section 3.7.1.

Response to comment I817-4

Regarding bioavailability, EPA uses a substantially reduced bioavailability (18% instead of 30%) based on site specific data & observed blood lead levels from thousands of children residing in the community (see the 2002 ROD, Part 3, Section 3.7.7). Also see response to Comment No. I295-1.

Response to comment I817-5

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. As described in the ROD

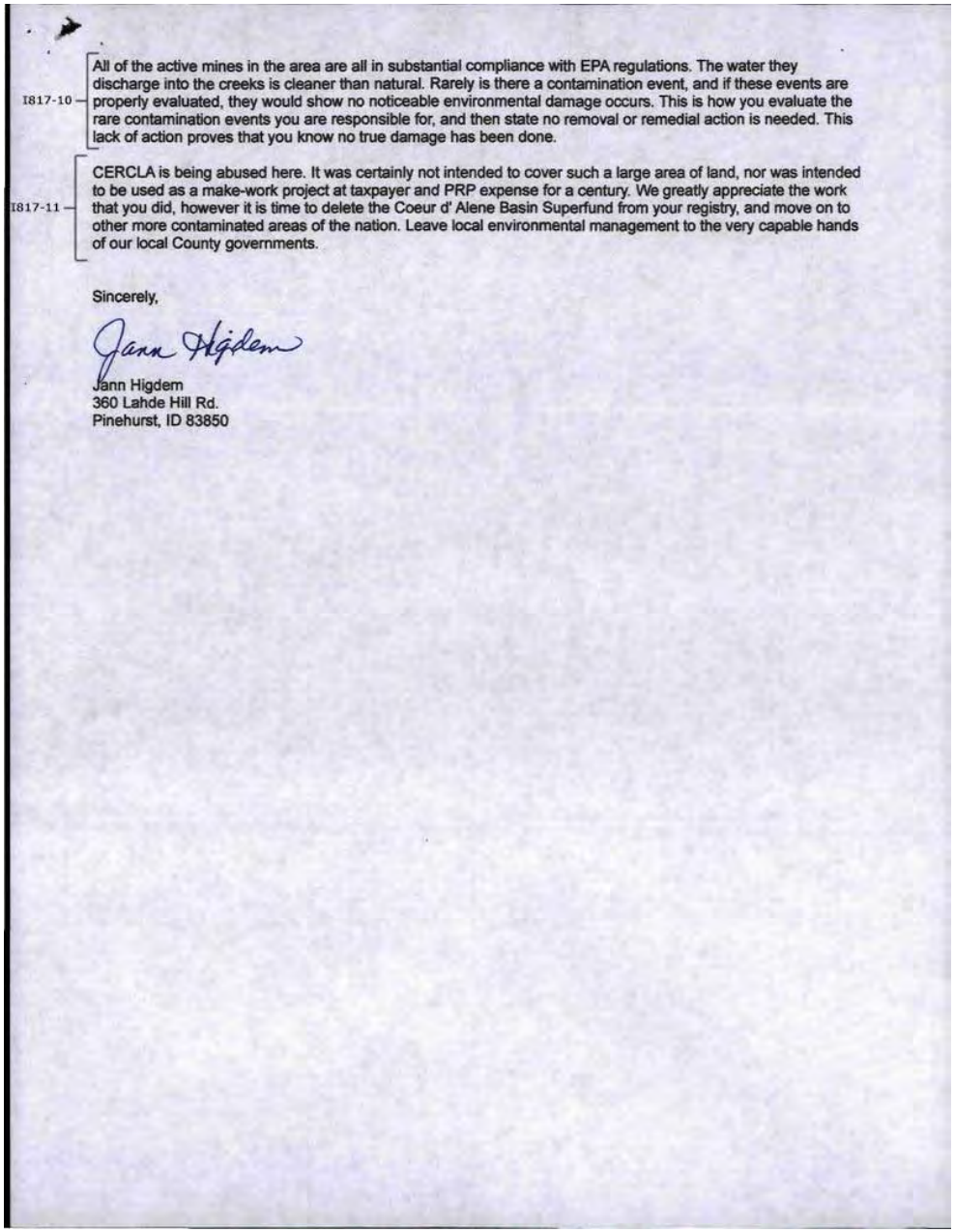
Amendment, the levels of contamination significantly exceed acceptable state and site-specific water quality standards.

Response to comment I817-6
See response to Comment No. LC33-8.

Response to comment I817-7
Comment noted.

Response to comment I817-8
The comment raises issues regarding whether EPA satisfied National Environmental Policy Act (NEPA) requirements. For CERCLA response actions, EPA is exempted from the procedural requirements of environmental laws, including NEPA. CERCLA Section 121 (d)(2)(A) addresses the applicability of other environmental laws through applicable or relevant and appropriate requirements (ARARs). The National Oil and Hazardous Substances Pollution Contingency Plan interprets this to require compliance only with substantive, not procedural, aspects of ARARs. Because NEPA requirements are procedural, NEPA is not an ARAR for CERCLA response actions. EPA procedures or environmental reviews under CERCLA enabling legislation are functionally equivalent to the NEPA process and thus, exempt from the procedural requirements in NEPA. CERCLA addresses the two basic objectives of NEPA: (1) the agency should consider significant environmental impacts of the proposed action, and (2) relevant environmental information should be made available to the public, which allows the public to play a role in the agency's decision-making process and implementation of the decision. The administrative record EPA developed in support of the Selected Remedy documents that EPA, by following the requirements of the NCP, conducted a remedy selection process that was the functional equivalent of NEPA.

Response to comment I817-9
See response to Comment No. I817-8.



I817-10 All of the active mines in the area are all in substantial compliance with EPA regulations. The water they discharge into the creeks is cleaner than natural. Rarely is there a contamination event, and if these events are properly evaluated, they would show no noticeable environmental damage occurs. This is how you evaluate the rare contamination events you are responsible for, and then state no removal or remedial action is needed. This lack of action proves that you know no true damage has been done.

I817-11 CERCLA is being abused here. It was certainly not intended to cover such a large area of land, nor was intended to be used as a make-work project at taxpayer and PRP expense for a century. We greatly appreciate the work that you did, however it is time to delete the Coeur d' Alene Basin Superfund from your registry, and move on to other more contaminated areas of the nation. Leave local environmental management to the very capable hands of our local County governments.

Sincerely,

Jann Higdem

Jann Higdem
360 Lahde Hill Rd.
Pinehurst, ID 83850

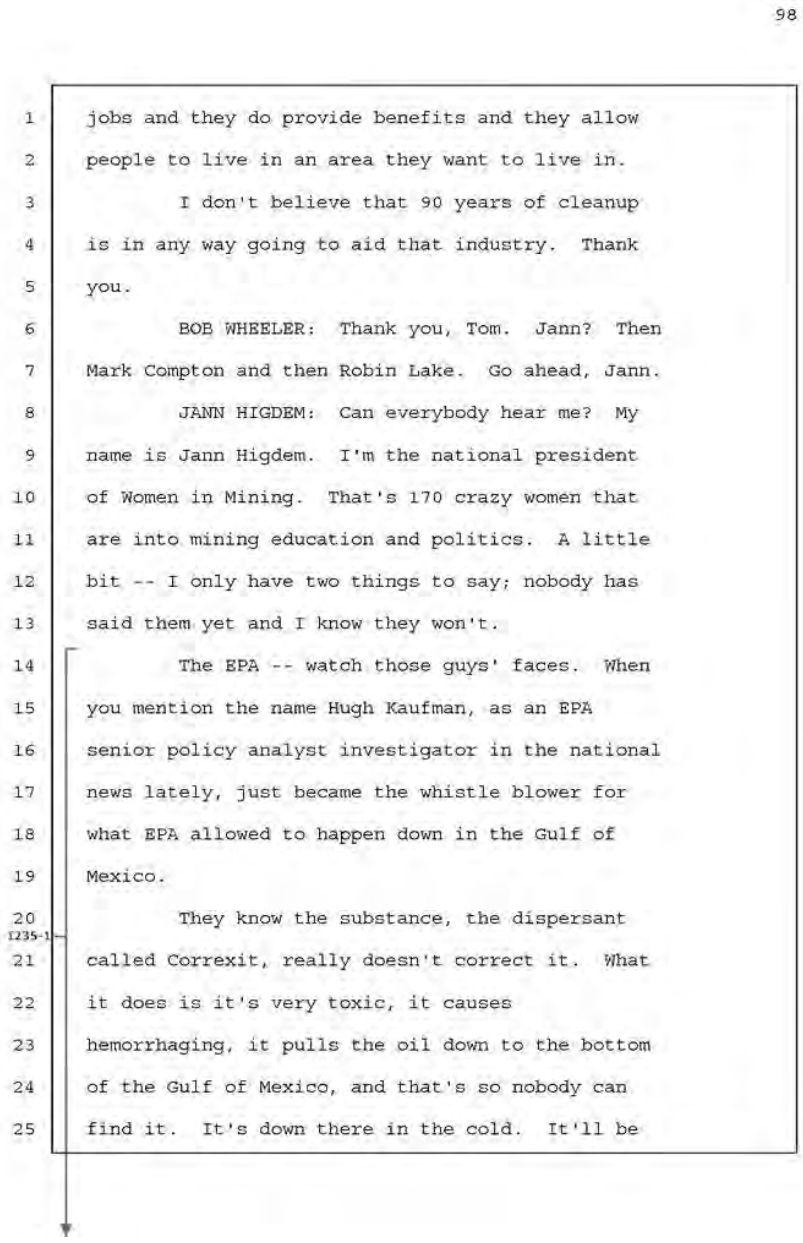
Response to comment I817-10

Comment noted.

Response to comment I817-11

See response to Comment No. I295-1.

Higdem, Jann, I235, Letter 610097-30



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jobs and they do provide benefits and they allow people to live in an area they want to live in.

I don't believe that 90 years of cleanup is in any way going to aid that industry. Thank you.

BOB WHEELER: Thank you, Tom. Jann? Then Mark Compton and then Robin Lake. Go ahead, Jann.

JANN HIGDEM: Can everybody hear me? My name is Jann Higdem. I'm the national president of Women in Mining. That's 170 crazy women that are into mining education and politics. A little bit -- I only have two things to say; nobody has said them yet and I know they won't.

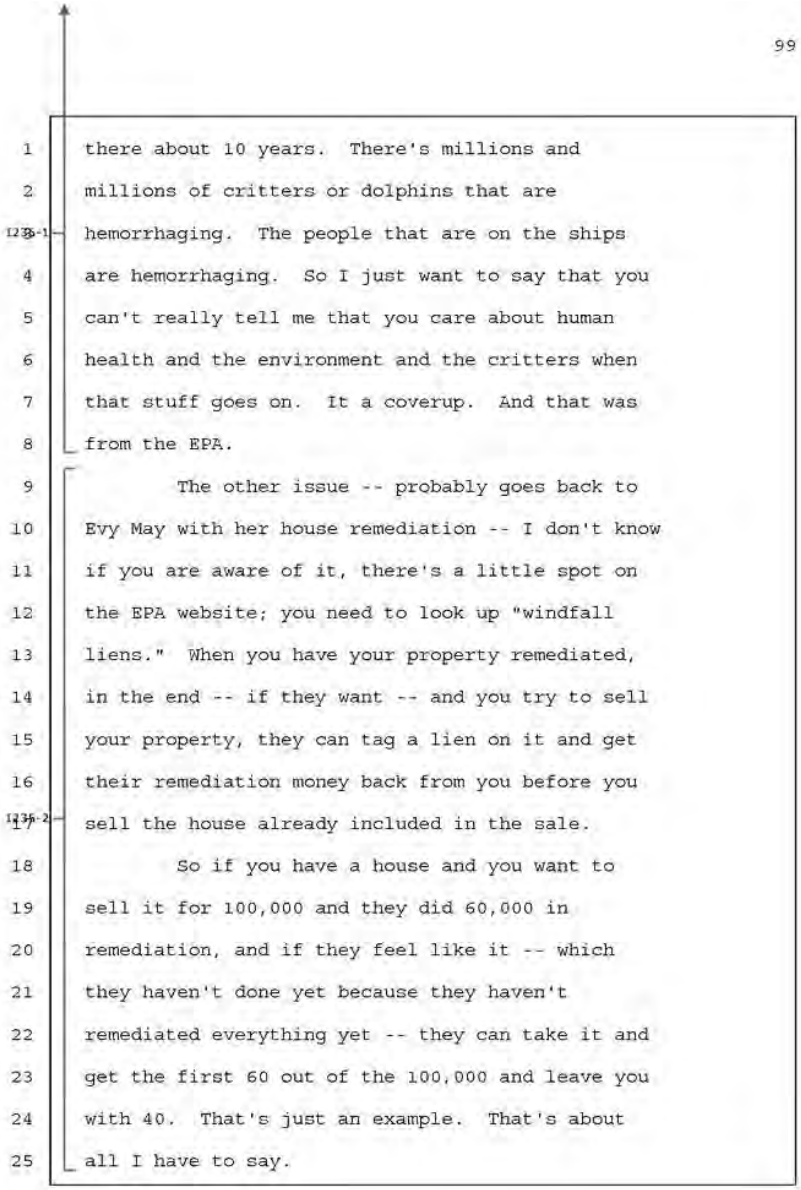
The EPA -- watch those guys' faces. When you mention the name Hugh Kaufman, as an EPA senior policy analyst investigator in the national news lately, just became the whistle blower for what EPA allowed to happen down in the Gulf of Mexico.

I235-1

They know the substance, the dispersant called Correxit, really doesn't correct it. What it does is it's very toxic, it causes hemorrhaging, it pulls the oil down to the bottom of the Gulf of Mexico, and that's so nobody can find it. It's down there in the cold. It'll be

Response to comment I235-1

Comment noted.



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there about 10 years. There's millions and millions of critters or dolphins that are hemorrhaging. The people that are on the ships are hemorrhaging. So I just want to say that you can't really tell me that you care about human health and the environment and the critters when that stuff goes on. It a coverup. And that was from the EPA.

I235-1

The other issue -- probably goes back to Evy May with her house remediation -- I don't know if you are aware of it, there's a little spot on the EPA website; you need to look up "windfall liens." When you have your property remediated, in the end -- if they want -- and you try to sell your property, they can tag a lien on it and get their remediation money back from you before you sell the house already included in the sale.

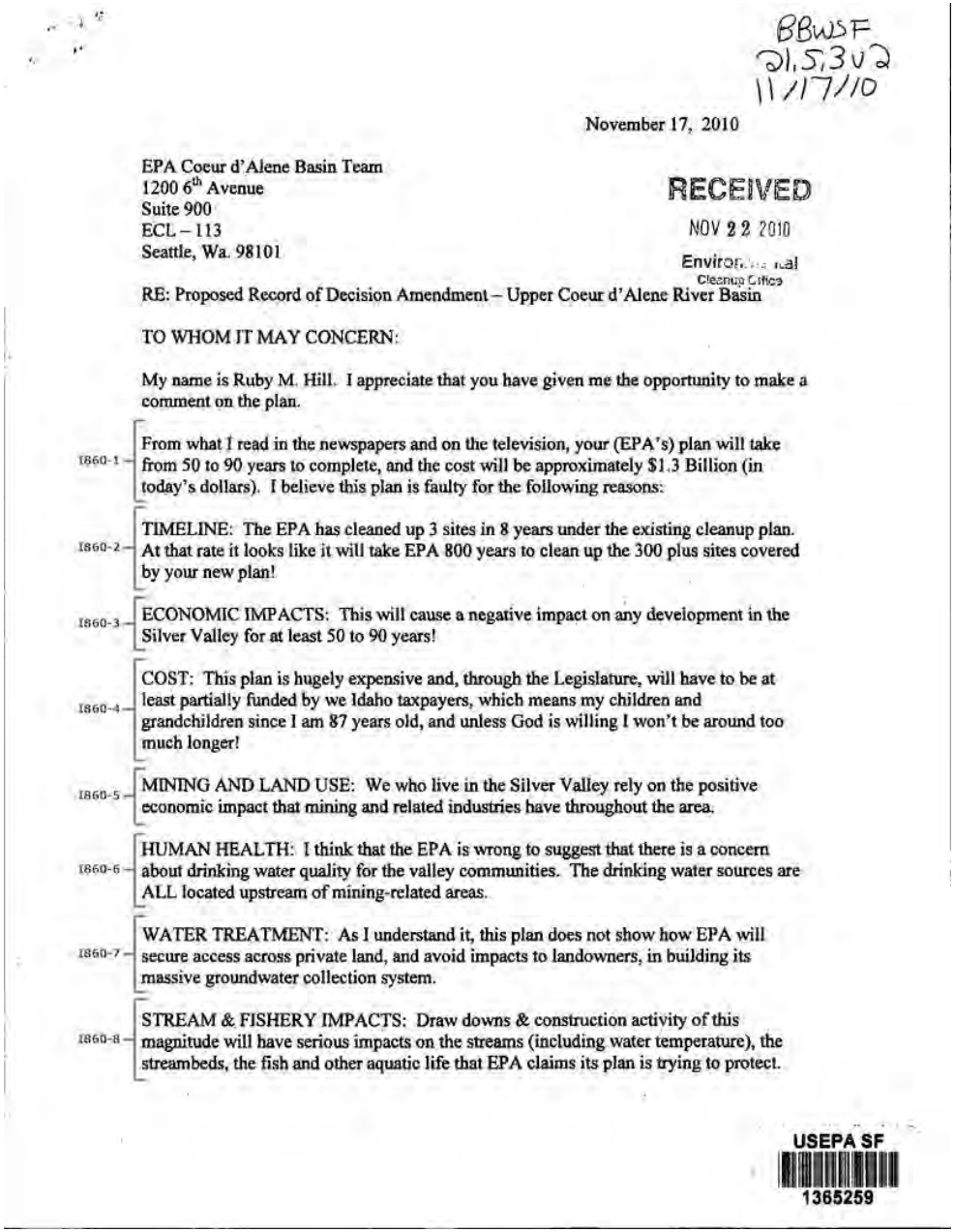
I235-2

So if you have a house and you want to sell it for 100,000 and they did 60,000 in remediation, and if they feel like it -- which they haven't done yet because they haven't remediated everything yet -- they can take it and get the first 60 out of the 100,000 and leave you with 40. That's just an example. That's about all I have to say.

Response to comment I235-2

CERCLA does provide EPA authority to recover windfall lien to compensate EPA for the cost of remediation. EPA has not filed any such lien on a residential property at the site.

Hill, Ruby, I860, Letter 1365259



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11/17/10

November 17, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL – 113
Seattle, Wa. 98101

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NOV 22 2010
Environmental Cleanup Office

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

TO WHOM IT MAY CONCERN:

My name is Ruby M. Hill. I appreciate that you have given me the opportunity to make a comment on the plan.

I860-1 From what I read in the newspapers and on the television, your (EPA's) plan will take from 50 to 90 years to complete, and the cost will be approximately $1.3 Billion (in today's dollars). I believe this plan is faulty for the following reasons:

I860-2 TIMELINE: The EPA has cleaned up 3 sites in 8 years under the existing cleanup plan. At that rate it looks like it will take EPA 800 years to clean up the 300 plus sites covered by your new plan!

I860-3 ECONOMIC IMPACTS: This will cause a negative impact on any development in the Silver Valley for at least 50 to 90 years!

I860-4 COST: This plan is hugely expensive and, through the Legislature, will have to be at least partially funded by we Idaho taxpayers, which means my children and grandchildren since I am 87 years old, and unless God is willing I won't be around too much longer!

I860-5 MINING AND LAND USE: We who live in the Silver Valley rely on the positive economic impact that mining and related industries have throughout the area.

I860-6 HUMAN HEALTH: I think that the EPA is wrong to suggest that there is a concern about drinking water quality for the valley communities. The drinking water sources are ALL located upstream of mining-related areas.

I860-7 WATER TREATMENT: As I understand it, this plan does not show how EPA will secure access across private land, and avoid impacts to landowners, in building its massive groundwater collection system.

I860-8 STREAM & FISHERY IMPACTS: Draw downs & construction activity of this magnitude will have serious impacts on the streams (including water temperature), the streambeds, the fish and other aquatic life that EPA claims its plan is trying to protect.

USEPA SF
1365259

Response to comment I860-1
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I860-2
See response to Comment No. I58-1.

Response to comment I860-3
See response to Comment No. I474-1.

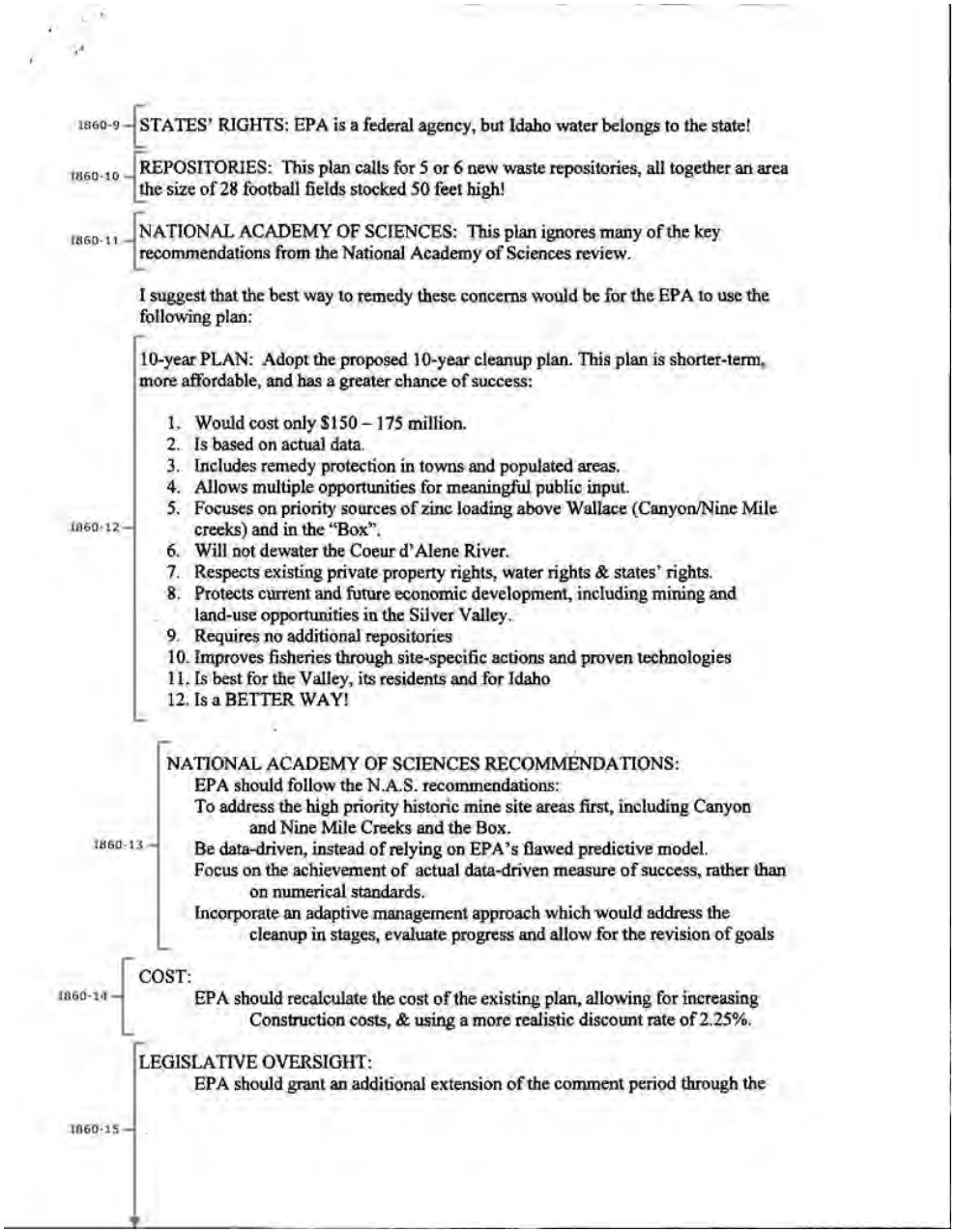
Response to comment I860-4
See response to Comment No. I58-2.

Response to comment I860-5
See response to Comment No. I58-5.

Response to comment I860-6
EPA has not focused its Selected Remedy on drinking water. Past cleanup plans have already addressed residential drinking water issues. However, the Upper Basin Selected Remedy will significantly improve surface water quality in the SFCDR and its tributaries. In the case of the SFCDR, the applicable or relevant and appropriate requirements (ARARs) that will protect the environment include site-specific ambient water quality criteria (AWQC). These criteria were developed by the State of Idaho to protect aquatic life. The water quality standards to protect the environment are more stringent than drinking water standards (i.e., maximum contaminant levels [MCLs]) for contaminants of concern in the Basin. (There is one exception -- mercury, as it has not been found to be prevalent in the Upper Basin.) Therefore, EPA believes that achieving ARARs will inherently have a potential drinking water benefit.

Response to comment I860-7
See response to Comment No. I248-1.

Response to comment I860-8
See responses to comments LC33-10 and I54-8.



I860-9 STATES' RIGHTS: EPA is a federal agency, but Idaho water belongs to the state!

I860-10 REPOSITORIES: This plan calls for 5 or 6 new waste repositories, all together an area the size of 28 football fields stocked 50 feet high!

I860-11 NATIONAL ACADEMY OF SCIENCES: This plan ignores many of the key recommendations from the National Academy of Sciences review.

I suggest that the best way to remedy these concerns would be for the EPA to use the following plan:

10-year PLAN: Adopt the proposed 10-year cleanup plan. This plan is shorter-term, more affordable, and has a greater chance of success:

1. Would cost only $150 – 175 million.
2. Is based on actual data.
3. Includes remedy protection in towns and populated areas.
4. Allows multiple opportunities for meaningful public input.
5. Focuses on priority sources of zinc loading above Wallace (Canyon/Nine Mile creeks) and in the "Box". I860-12
6. Will not dewater the Coeur d'Alene River.
7. Respects existing private property rights, water rights & states' rights.
8. Protects current and future economic development, including mining and land-use opportunities in the Silver Valley.
9. Requires no additional repositories
10. Improves fisheries through site-specific actions and proven technologies
11. Is best for the Valley, its residents and for Idaho
12. Is a BETTER WAY!

NATIONAL ACADEMY OF SCIENCES RECOMMENDATIONS:
EPA should follow the N.A.S. recommendations:
To address the high priority historic mine site areas first, including Canyon and Nine Mile Creeks and the Box. I860-13
Be data-driven, instead of relying on EPA's flawed predictive model.
Focus on the achievement of actual data-driven measure of success, rather than on numerical standards.
Incorporate an adaptive management approach which would address the cleanup in stages, evaluate progress and allow for the revision of goals

COST: I860-14
EPA should recalculate the cost of the existing plan, allowing for increasing Construction costs, & using a more realistic discount rate of 2.25%.

LEGISLATIVE OVERSIGHT:
EPA should grant an additional extension of the comment period through the I860-15

Response to comment I860-9
EPA agrees that the State of Idaho regulates Idaho state waters. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I860-10
See response to Comment No. I58-1 regarding the reduction in scope of the ROD Amendment compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. I54-3 regarding repositories.

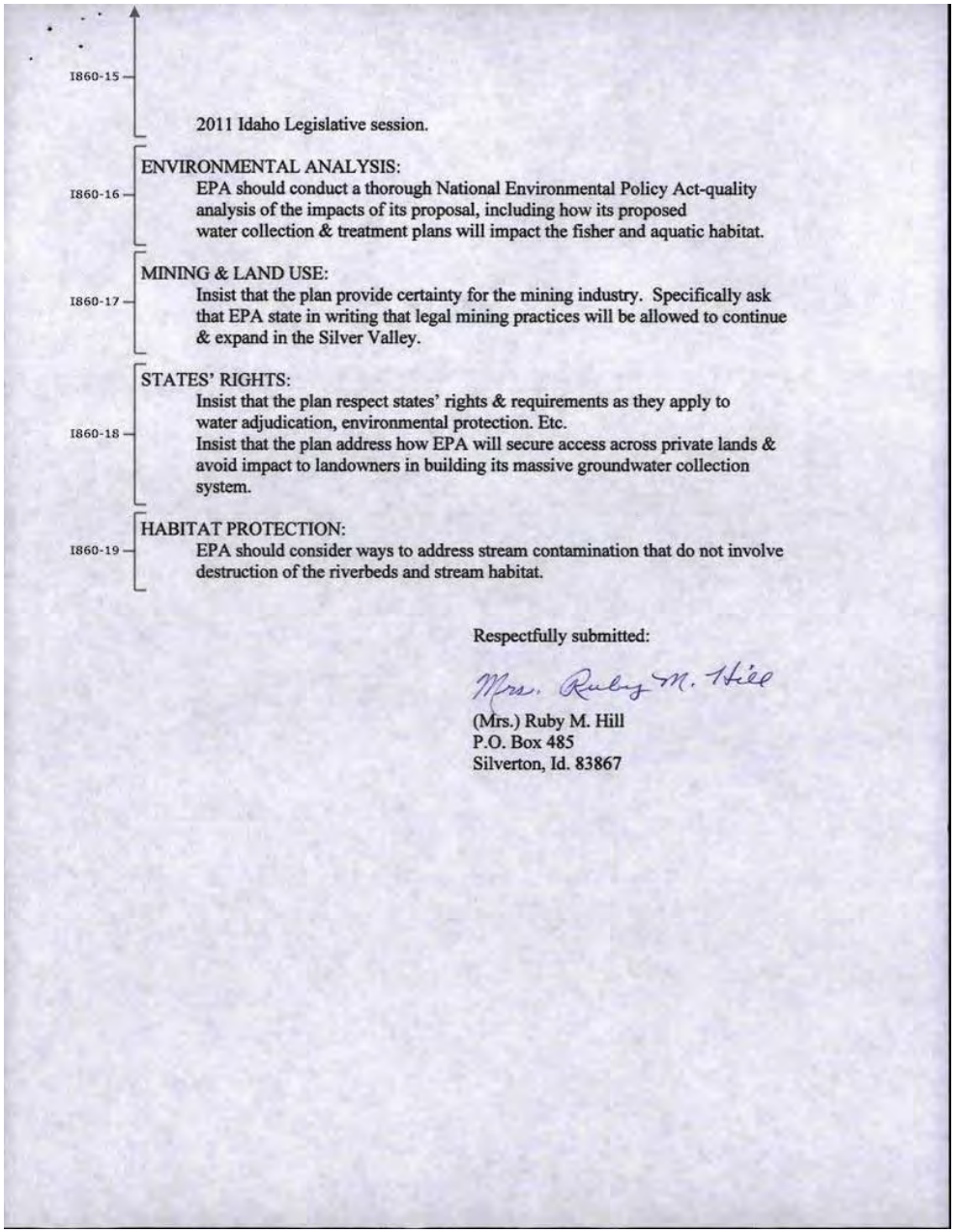
Response to comment I860-11
See response to Comment No. LJ27-8.

Response to comment I860-12
See response to Comment No. I474-2.

Response to comment I860-13
See responses to Comment Nos. LJ27-8, LJ11-2, I822-14, and 158-4.

Response to comment I860-14
See response to Comment No. I54-12.

Response to comment I860-15
See response to Comment No. LJ39-5.



I860-15

2011 Idaho Legislative session.

I860-16

ENVIRONMENTAL ANALYSIS:
EPA should conduct a thorough National Environmental Policy Act-quality analysis of the impacts of its proposal, including how its proposed water collection & treatment plans will impact the fisher and aquatic habitat.

I860-17

MINING & LAND USE:
Insist that the plan provide certainty for the mining industry. Specifically ask that EPA state in writing that legal mining practices will be allowed to continue & expand in the Silver Valley.

I860-18

STATES' RIGHTS:
Insist that the plan respect states' rights & requirements as they apply to water adjudication, environmental protection. Etc.
Insist that the plan address how EPA will secure access across private lands & avoid impact to landowners in building its massive groundwater collection system.

I860-19

HABITAT PROTECTION:
EPA should consider ways to address stream contamination that do not involve destruction of the riverbeds and stream habitat.

Respectfully submitted:

Mrs. Ruby M. Hill

(Mrs.) Ruby M. Hill
P.O. Box 485
Silverton, Id. 83867

Response to comment I860-16

The comment raises issues regarding whether EPA satisfied National Environmental Policy Act (NEPA) requirements. For CERCLA response actions, EPA is exempted from the procedural requirements of environmental laws, including NEPA. CERCLA Section 121 (d)(2)(A) addresses the applicability of other environmental laws through applicable or relevant and appropriate requirements (ARARs). The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) interprets this to require compliance only with substantive, not procedural, aspects of ARARs. Because NEPA requirements are procedural, NEPA is not an ARAR for CERCLA response actions. EPA procedures or environmental reviews under CERCLA enabling legislation are functionally equivalent to the NEPA process and thus, exempt from the procedural requirements in NEPA. CERCLA addresses the two basic objectives of NEPA: (1) the agency should consider significant environmental impacts of the proposed action, and (2) relevant environmental information should be made available to the public, which allows the public to play a role in the agency's decision-making process and implementation of the decision. The administrative record EPA developed in support of the Selected Remedy documents that EPA, by following the requirements of the NCP, conducted a remedy selection process that was the functional equivalent of NEPA.

Response to comment I860-17

See response to Comment No. I58-5.

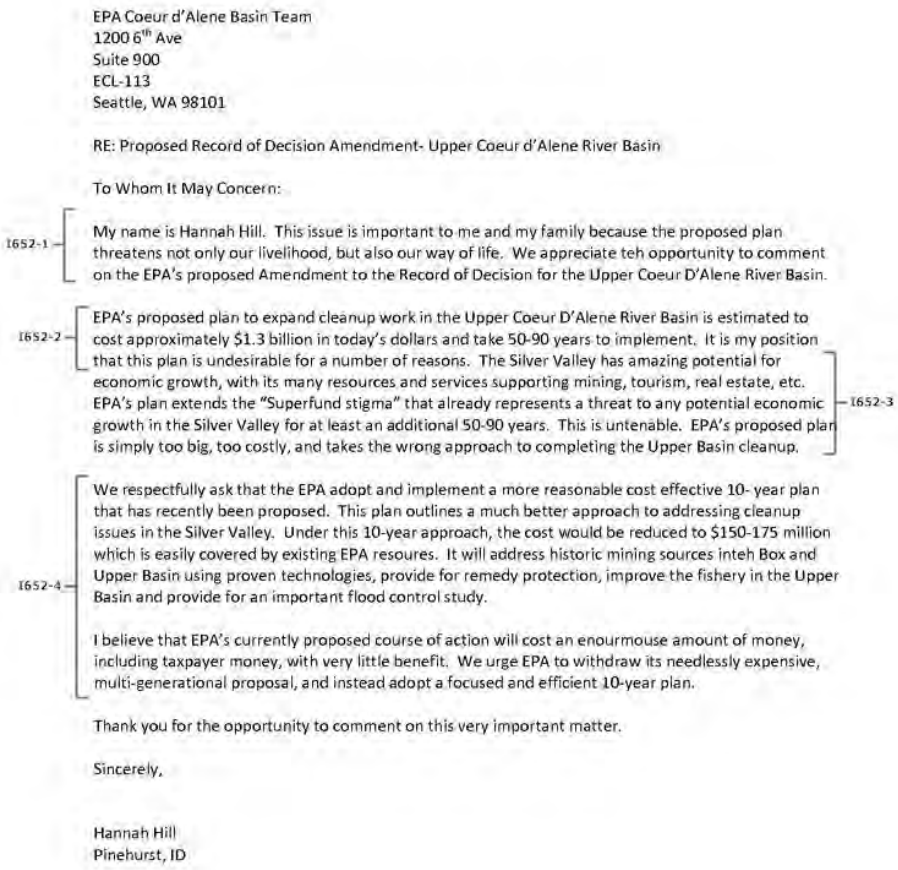
Response to comment I860-18

See responses to Comment Nos. SA4-12 and I248-1 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I860-19

Comment noted. Through the design and construction process EPA will seek to minimize damage to the environment while conducting necessary remedial work. As part of the cleanup EPA must meet the substantive requirements of the Clean Water Act to prevent and/or mitigate any deleterious effects on streams and stream habitat. EPA will also be using best management practices to control turbidity and erosion while conducting any in stream work.

Hill, Hannah, I652, Letter 618262



EPA Coeur d'Alene Basin Team
1200 6th Ave
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment- Upper Coeur d'Alene River Basin

To Whom It May Concern:

I652-1 My name is Hannah Hill. This issue is important to me and my family because the proposed plan threatens not only our livelihood, but also our way of life. We appreciate teh opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur D'Alene River Basin.

I652-2 EPA's proposed plan to expand cleanup work in the Upper Coeur D'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly, and takes the wrong approach to completing the Upper Basin cleanup. I652-3

I652-4 We respectfully ask that the EPA adopt and implement a more reasonable cost effective 10- year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resoures. It will address historic mining sources inteh Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I believe that EPA's currently proposed course of action will cost an enourmouse amount of money, including taxpayer money, with very little benefit. We urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Hannah Hill
Pinehurst, ID

618262

Response to comment I652-1

Thank you for your comments.

Response to comment I652-2

See responses to Comment Nos. I58-1 and I58-2.

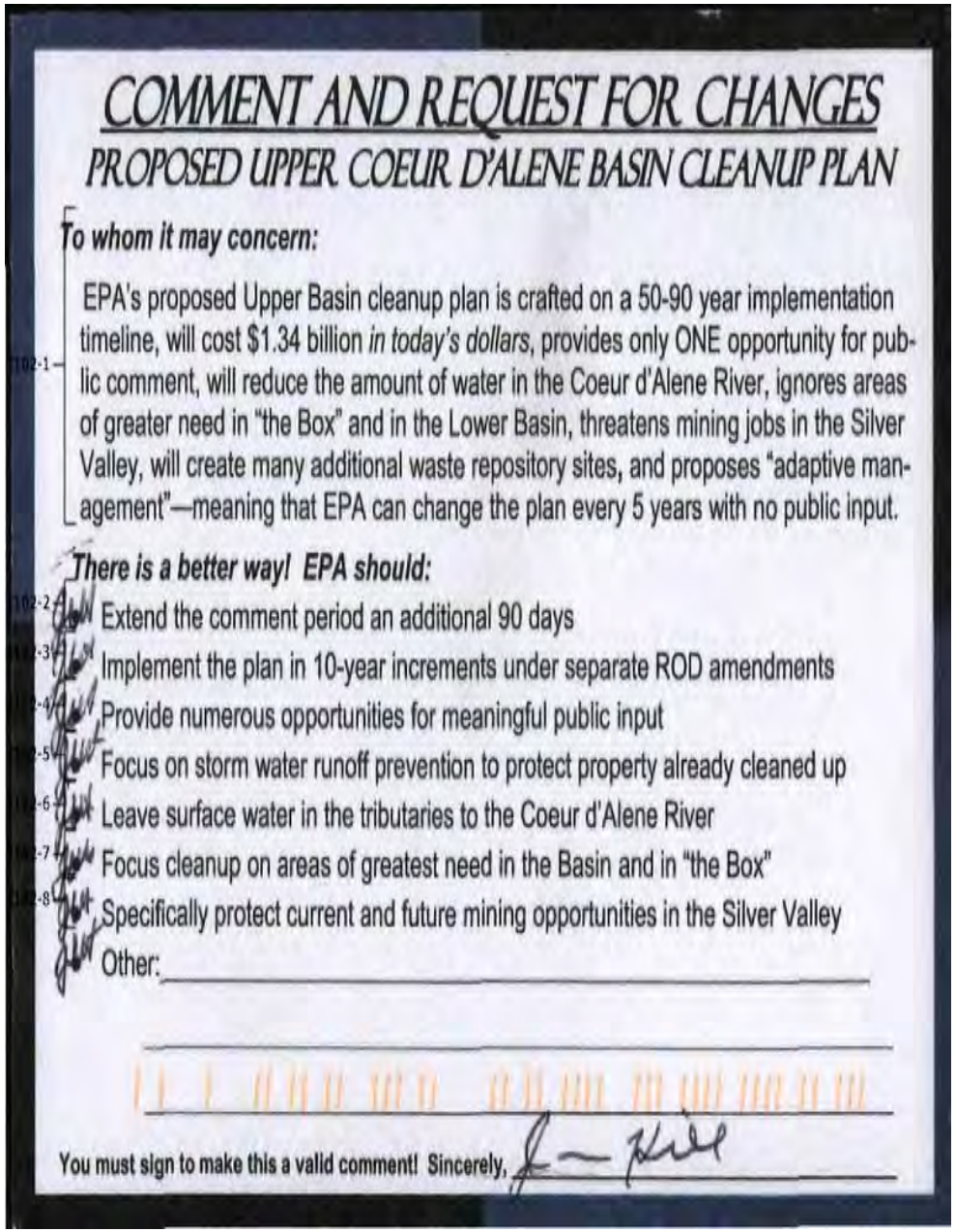
Response to comment I652-3

See response to Comment No. I474-1.

Response to comment I652-4

See response to Comment No. I474-2.

Hill, Jamie, I102, Letter 1357149



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I102-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I102-2 Extend the comment period an additional 90 days
I102-3 Implement the plan in 10-year increments under separate ROD amendments
I102-4 Provide numerous opportunities for meaningful public input
I102-5 Focus on storm water runoff prevention to protect property already cleaned up
I102-6 Leave surface water in the tributaries to the Coeur d'Alene River
I102-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
I102-8 Specifically protect current and future mining opportunities in the Silver Valley
Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I102-1
See response to Comment No. I25-1.

Response to comment I102-2
See response to Comment No. I25-2.

Response to comment I102-3
See response to Comment No. I25-3.

Response to comment I102-4
See response to Comment No. I25-4.

Response to comment I102-5
See response to Comment No. I25-5.

Response to comment I102-6
See response to Comment No. I25-6.

Response to comment I102-7
See response to Comment No. I25-7.

Response to comment I102-8
See response to Comment No. I25-8.

Hill, Jesse, I12, Letter 896735

EPA's Proposed Coeur d' Alene River Basin Cleanup Plan
Jesse Hill
to:
CDABasin
08/02/2010 01:59 PM
Show Details

I12-1 The current proposal call for the removal of waste rock from historic mining properties. This means the removal of millions of cubic yards of material. Where are all of these waste repositories going to go? Why is there a need to remove waste rock? It is just that...waste rock it is inert. Also there is no need to re mediate the South Fork of the Coeur D Alene above Mullan. I know that the water quality of that

I12-2 stretch of river meets all state and federal requirements per the clean water act. If it is true of that stretch of river how many other sites do not actually pose a risk? The EPA is merely wasting money. ASARCO is paying a considerable amount of money that will be used to fund a portion of this

I12-3 proposal. The company has been penalized, retro actively, for past mining practices that were not only common at the time, but legal. How can you say that you are going to protect the interest of current and future mining when your actions speak to the opposite?

I12-4 90 years is too long for one plan. Break it into 10 year segments. The idea of a living document or adaptive management gives too much leeway and power to the EPA with no available recourse from those affected.

I12-5 The proposal states that there will be a measured increase in state revenue from new industries, and tourism. How can that be when the proposal shuts down local industry and thus the supporting industries as well as restricting access to land. Many tourists come here to see the beauty of northern Idaho. Do you expect me to believe that all of these lined channels and pipelines are going to enhance the ascetics of the valley? Where are these pipe lines going to be located. Does the EPA intend to claim eminent domain should the plans for one of these pipe lines call for it to go through my land?

The fact sheet for the proposal says the the EPA does not wish to segment the proposal in 10 year increments because it is time intensive and costly, however the plan itself calls for continual revisions and updates. It would seem that the EPA already plans to invest the time and money for this process.

I12-6 "Because these cleanup actions will take years and conditions will change over time, EPA will use an "adaptive management" process to make decisions along the way. This means decisions will take into account new information on the effectiveness of earlier cleanup actions as it becomes available. The Implementation Plan will be updated regularly to guide future decisions and to document changes to project priorities."

I12-7 And finally, how does the EPA determine that there is a lead contaminant in an area? The reason that there is current and historical mining in the area is because there is an abundance of mineralization in the basin. That means background mineral loading ie. naturally occurring. For lead this mineralization presents itself as lead sulfide. This is an inert mineral and is of little concern to human health. However, lead oxide like that produced by the bunker hill smelter is of concern. Clean up to date has addressed the area inside of the box and blood lead levels are steadily decreasing. How does the EPA intend to distinguish between lead oxide and lead sulfide? Why is airborne lead still a concern when there are no longer any smelting activities in the basin?

896735

Response to comment I12-1

See response to Comment No. I58-1 regarding the reduction in scope of the ROD Amendment compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. I54-3 regarding repositories.

Response to comment I12-2

See response to Comment No. I58-1 regarding the reduced scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. The reduced scope Selected Remedy includes relatively few actions in the SFCDR upstream of Wallace.

Response to comment I12-3

See response to Comment No. I58-5.

Response to comment I12-4

See responses to Comment Nos. I58-1 and I58-4.

Response to comment I12-5

See responses to Comment Nos. I54-2 and I58-5.

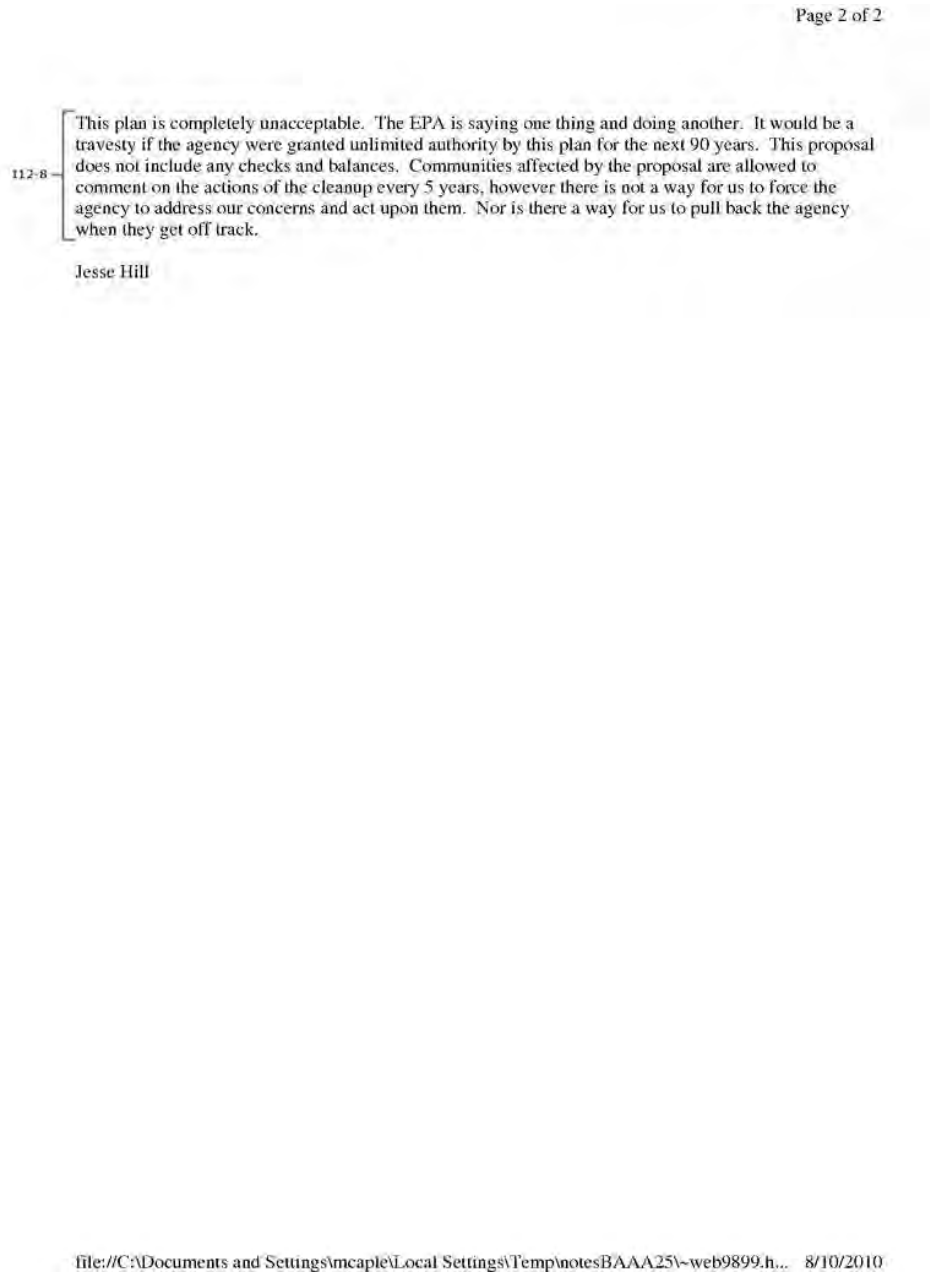
Response to comment I12-6

Regarding the reduced scope and implementation of the Selected Remedy, including the use of adaptive management, see the response to Comment No. I58-1 and the ROD Amendment, Part 2, Section 12.3, respectively. Regarding the route of pipelines, see response to Comment No. I248-1.

Response to comment I12-7

An extensive evaluation of background concentrations of metals was conducted as part of the studies. The overwhelming conclusion of this evaluation is that the dominant source of metals to the surface water is mining-related contamination, that naturally occurring metals contribute insignificant amounts of metals to surface waters, and that the contribution of naturally occurring metals is localized (associated with areas near exposed ore bodies). Lead sulfide, lead phosphate, and lead oxides are not soluble in water. When soils with high concentrations of metals are exposed to air, a natural geochemical process can

occur in which the sulfide form of the metals is oxidized. These oxidized metals can absorb to soil particles and be transported from the landscape with the soil via surface runoff and wind and water erosion. Lead absorption is influenced by the route of exposure, the exposure medium, speciation and physiochemical characteristics of lead, and the age and physiological state of the exposed individual. Adverse effects of lead in humans are most often related to the blood lead level as an indicator of internal lead dose. Regarding human health risks in the Basin, see response to Comment No. I295-1



Page 2 of 2

I12-8 This plan is completely unacceptable. The EPA is saying one thing and doing another. It would be a travesty if the agency were granted unlimited authority by this plan for the next 90 years. This proposal does not include any checks and balances. Communities affected by the proposal are allowed to comment on the actions of the cleanup every 5 years, however there is not a way for us to force the agency to address our concerns and act upon them. Nor is there a way for us to pull back the agency when they get off track.

Jesse Hill

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web9899.h... 8/10/2010

Response to comment I12-8

See response to Comment No. I58-1 in regards to the duration of cleanup. See response to Comment No. LJ11-2 regarding EPA's limitations to making changes to cleanup without public comment. EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Where changes to the Selected Remedy are significant, EPA will provide opportunities for public participation consistent with the requirements of Section 113(k) of CERCLA and 40 Code of Federal Regulations Section 300.435(c). Depending on the significance of the changes in the cleanup approach, there will be additional opportunities for public input as the cleanup proceeds.

Hill, Joe, I183, Letter 1357406

COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I83-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I83-2 Extend the comment period an additional 90 days
- I83-3 Implement the plan in 10-year increments under separate ROD amendments
- I83-4 Provide numerous opportunities for meaningful public input
- I83-5 Focus on storm water runoff prevention to protect property already cleaned up
- I83-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I83-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I83-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Joe Hill

Response to comment I183-1
See response to Comment No. I25-1.

Response to comment I183-2
See response to Comment No. I25-2.

Response to comment I183-3
See response to Comment No. I25-3.

Response to comment I183-4
See response to Comment No. I25-4.

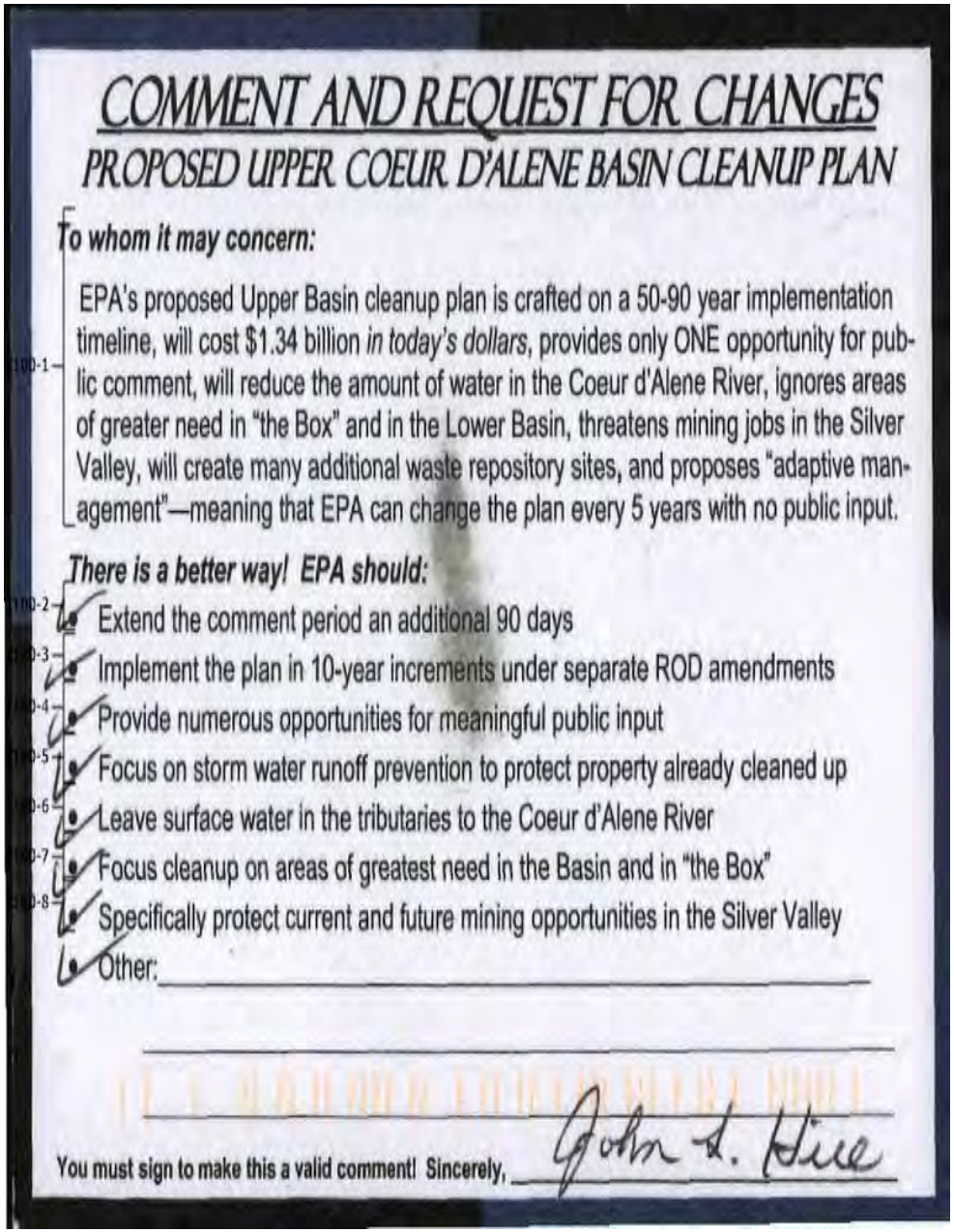
Response to comment I183-5
See response to Comment No. I25-5.

Response to comment I183-6
See response to Comment No. I25-6.

Response to comment I183-7
See response to Comment No. I25-7.

Response to comment I183-8
See response to Comment No. I25-8.

Hill, John L., I100, Letter 1357147



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I100-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I100-2 ✓ Extend the comment period an additional 90 days
- I100-3 ✓ Implement the plan in 10-year increments under separate ROD amendments
- I100-4 ✓ Provide numerous opportunities for meaningful public input
- I100-5 ✓ Focus on storm water runoff prevention to protect property already cleaned up
- I100-6 ✓ Leave surface water in the tributaries to the Coeur d'Alene River
- I100-7 ✓ Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I100-8 ✓ Specifically protect current and future mining opportunities in the Silver Valley
- ✓ Other: _____

You must sign to make this a valid comment! Sincerely, John L. Hill

Response to comment I100-1
See response to Comment No. I25-1.

Response to comment I100-2
See response to Comment No. I25-2.

Response to comment I100-3
See response to Comment No. I25-3.

Response to comment I100-4
See response to Comment No. I25-4.

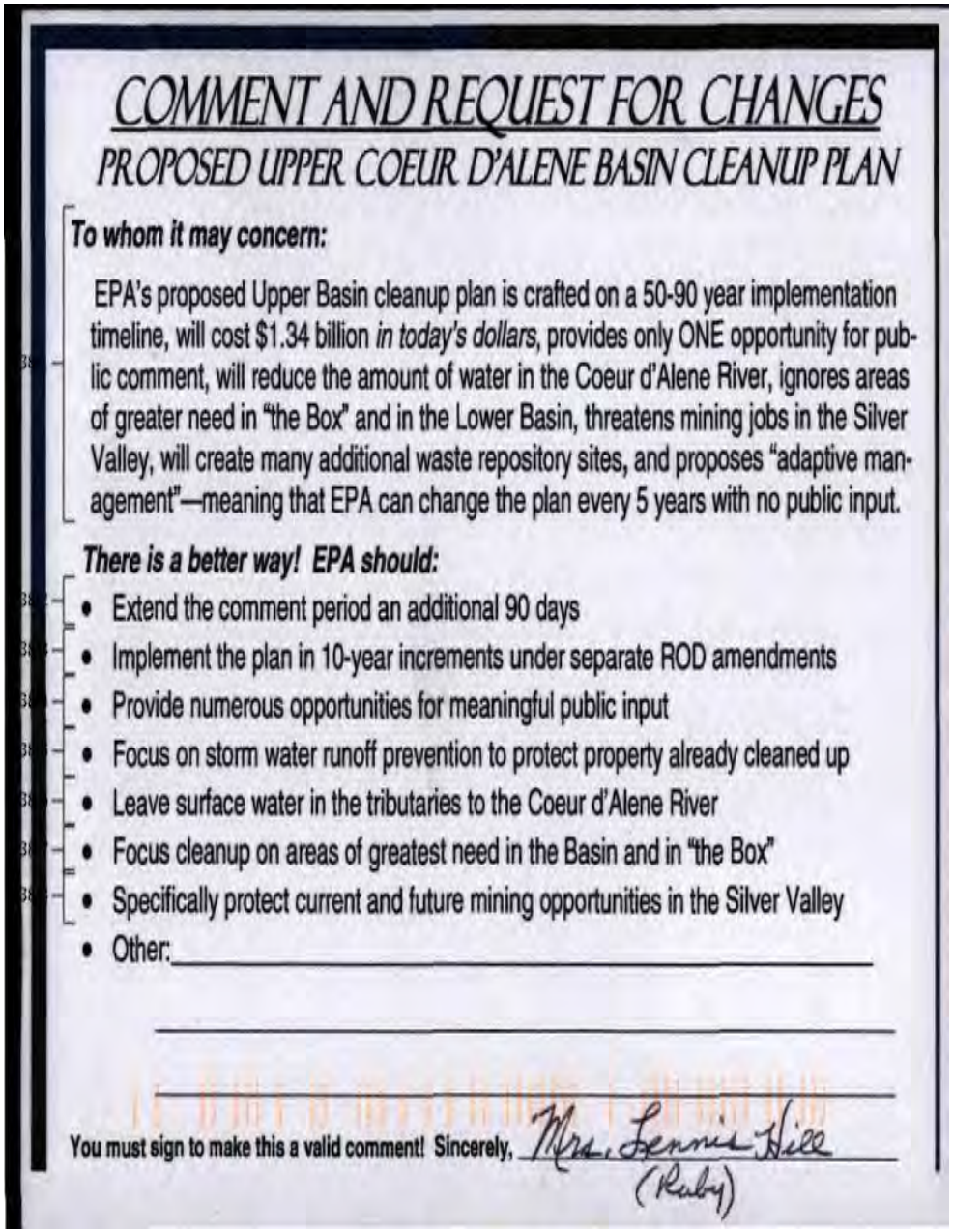
Response to comment I100-5
See response to Comment No. I25-5.

Response to comment I100-6
See response to Comment No. I25-6.

Response to comment I100-7
See response to Comment No. I25-7.

Response to comment I100-8
See response to Comment No. I25-8.

Hill, Lennis, I38, Letter 1357082



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I38-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I38-2 Extend the comment period an additional 90 days
- I38-3 Implement the plan in 10-year increments under separate ROD amendments
- I38-4 Provide numerous opportunities for meaningful public input
- I38-5 Focus on storm water runoff prevention to protect property already cleaned up
- I38-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I38-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I38-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

_____

_____

You must sign to make this a valid comment! Sincerely, Mrs. Lennis Hill (Ruby)

Response to comment I38-1
See response to Comment No. I25-1.

Response to comment I38-2
See response to Comment No. I25-2.

Response to comment I38-3
See response to Comment No. I25-3.

Response to comment I38-4
See response to Comment No. I25-4.

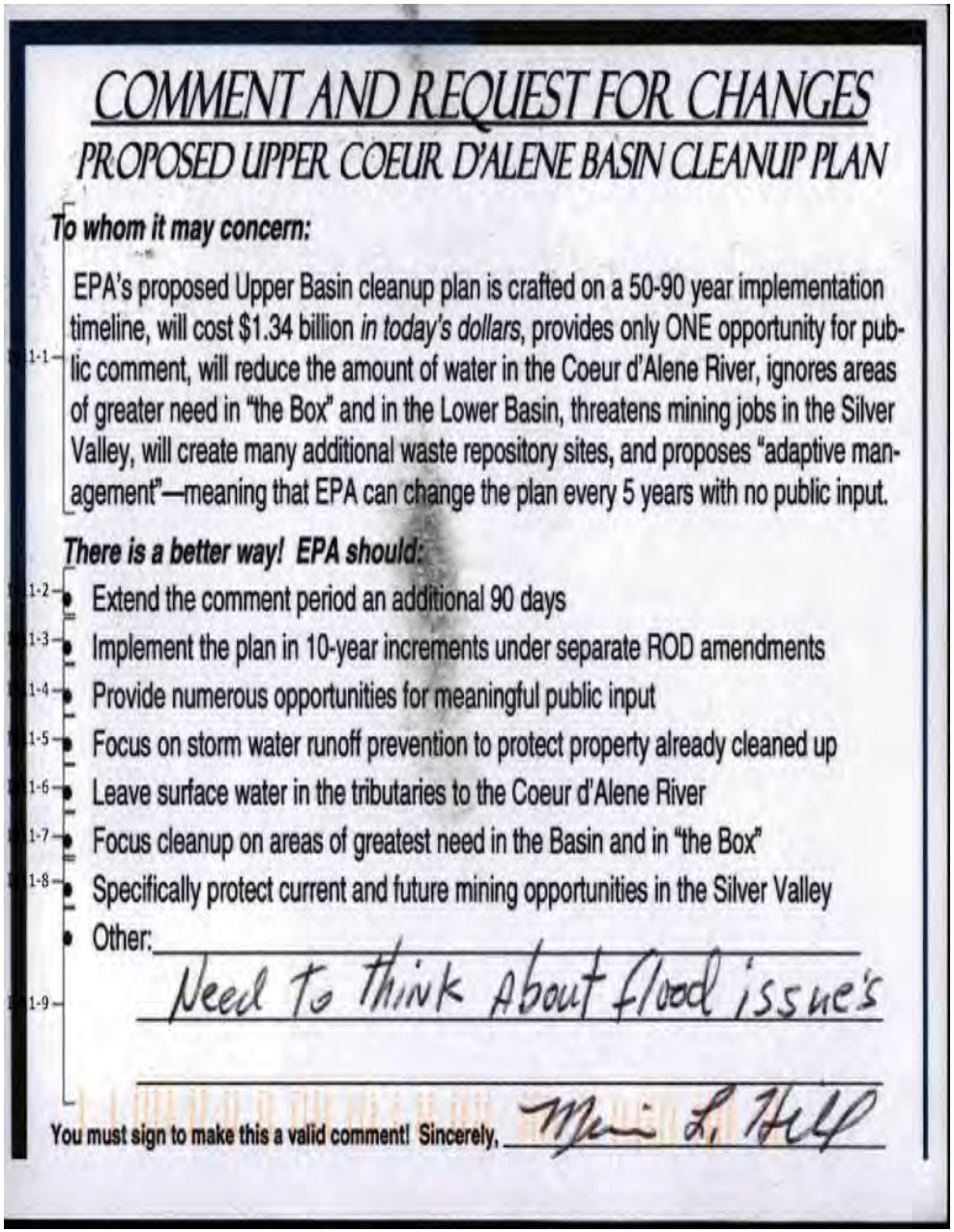
Response to comment I38-5
See response to Comment No. I25-5.

Response to comment I38-6
See response to Comment No. I25-6.

Response to comment I38-7
See response to Comment No. I25-7.

Response to comment I38-8
See response to Comment No. I25-8.

Hill, Unknown, I911, Letter 1308363



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I-2 Extend the comment period an additional 90 days
- I-3 Implement the plan in 10-year increments under separate ROD amendments
- I-4 Provide numerous opportunities for meaningful public input
- I-5 Focus on storm water runoff prevention to protect property already cleaned up
- I-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: Need To think About flood issue's

I-9

You must sign to make this a valid comment! Sincerely, Mari L. Hill

Response to comment I911-1
See response to Comment No. I25-1.

Response to comment I911-2
See response to Comment No. I25-2.

Response to comment I911-3
See response to Comment No. I25-3.

Response to comment I911-4
See response to Comment No. I25-4.

Response to comment I911-5
See response to Comment No. I25-5.

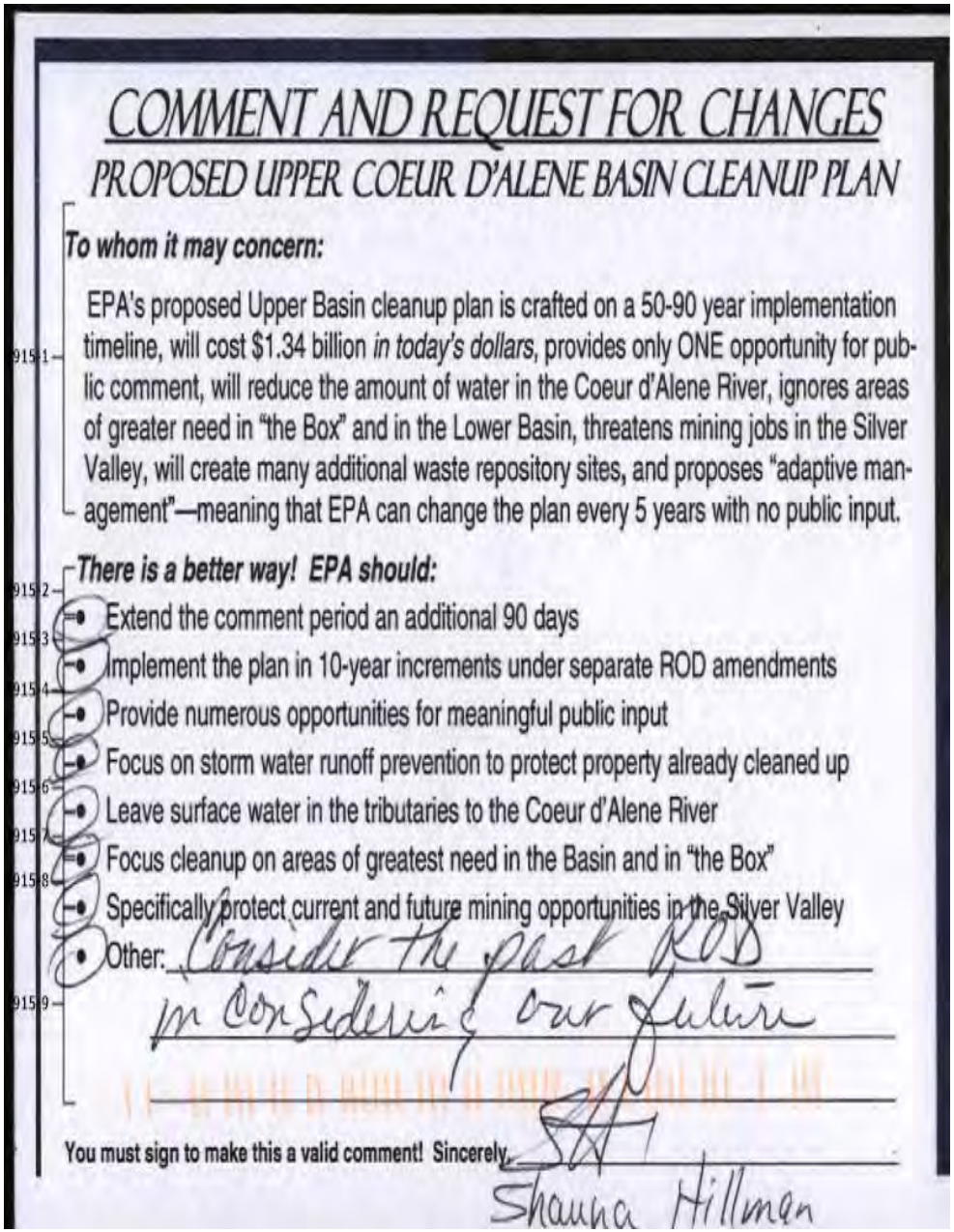
Response to comment I911-6
See response to Comment No. I25-6.

Response to comment I911-7
See response to Comment No. I25-7.

Response to comment I911-8
See response to Comment No. I25-8.

Response to comment I911-9
See responses to Comment Nos. I54-5 and LJ36-3.

Hillman, Shauna, I915, Letter 1357137



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I915-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I915-2 ☐ Extend the comment period an additional 90 days
I915-3 ☐ Implement the plan in 10-year increments under separate ROD amendments
I915-4 ☐ Provide numerous opportunities for meaningful public input
I915-5 ☐ Focus on storm water runoff prevention to protect property already cleaned up
I915-6 ☐ Leave surface water in the tributaries to the Coeur d'Alene River
I915-7 ☐ Focus cleanup on areas of greatest need in the Basin and in "the Box"
I915-8 ☐ Specifically protect current and future mining opportunities in the Silver Valley
I915-9 ☐ Other: Consider the past ROD in considering our future

You must sign to make this a valid comment! Sincerely,
Shauna Hillman

Response to comment I915-1
See response to Comment No. I25-1.

Response to comment I915-2
See response to Comment No. I25-2.

Response to comment I915-3
See response to Comment No. I25-3.

Response to comment I915-4
See response to Comment No. I25-4.

Response to comment I915-5
See response to Comment No. I25-5.

Response to comment I915-6
See response to Comment No. I25-6.

Response to comment I915-7
See response to Comment No. I25-7.

Response to comment I915-8
See response to Comment No. I25-8.

Response to comment I915-9
Comment noted. See the ROD Amendment, Part 2, Section 4.0 for additional detail regarding existing RODs.

Hillman, Shauna, I13, Letter 896736

EPAs Proposed Upper Coeur d'Alene River Basin Cleanup Plan
Shauna Hillman
to:
CDABasin
07/23/2010 12:42 PM
Show Details

July 23, 2010

Good Day:

I opposed the plan!

I13-1 — This plan will devastate the Silver Valley tourism efforts and marketing plans; not to mention our industrial tax basing and in mining .

I am expressing my dismay at the EPA control over the Silver Valley's future as a sustainable economy, tourist destination and natural habitat for fish and wildlife.

I13-2 — There must be more control over this government agency now and in the future.

Sincerely,

Shauna Hillman

--
Shauna Hillman, President
THE SILVER SUMMIT
INVESTMENT CONFERENCE, INC.
604 Bank Street
P.O. Box 1286
Wallace, Idaho 83873-1286
USA
208.556.1621
208.753.0591
Fax 208.752.1877

896736

Response to comment I13-1

See responses to Comment Nos. I54-2 and I58-5.

Response to comment I13-2

It is beyond the scope of the decision to address the role of government. EPA believes it has the authority to issue and implement the Selected Remedy. See response to Comment No. LJ11-2.

Hodge, Jim, I910, Letter 896737

Page 1 of 1

Pinehurst golf course
Jim Hodge
to:
CDABasin
07/27/2010 10:53 AM
Show Details

I910-1 — Why do the state and the EPA continue to insist that the Pinehurst Golf course is not a problem when we know that the rough area and the cart paths along with some of the Sand Traps have high levels of Pb in them? All we hear is that we don't meet the recreational criteria and that it is not a problem with kids. Yet when we have a large amount of golf carts being used on those cart paths and a lot of dust is being generated because of that. Plus when a contractor was working on site the other day they were told that they had to be careful with the hole that they were digging because the soil was contaminated. Either we are not contaminated or we are, the regulatory people can't have it both ways. A lot of the problems could be taken care of by upgrading the water system which was put in around 1950 and does not cover cart paths or some of the rough areas. Plus a cover put on the cart paths that would keep the dust down would be another remedy. Also there should be something done with the Sand Traps because I know for a fact that there is old Bunker Hill slag underneath some of the sand that is in them at this time. We used to use slag in our traps in place of Sand for several years. We would like the EPA to help us with the proper solutions for this situation. Thank you for the chance to comment on the New Work Order for the Basin Cleanup.

Pinehurst Golf Course Membership
Pinehurst Golf Club.com

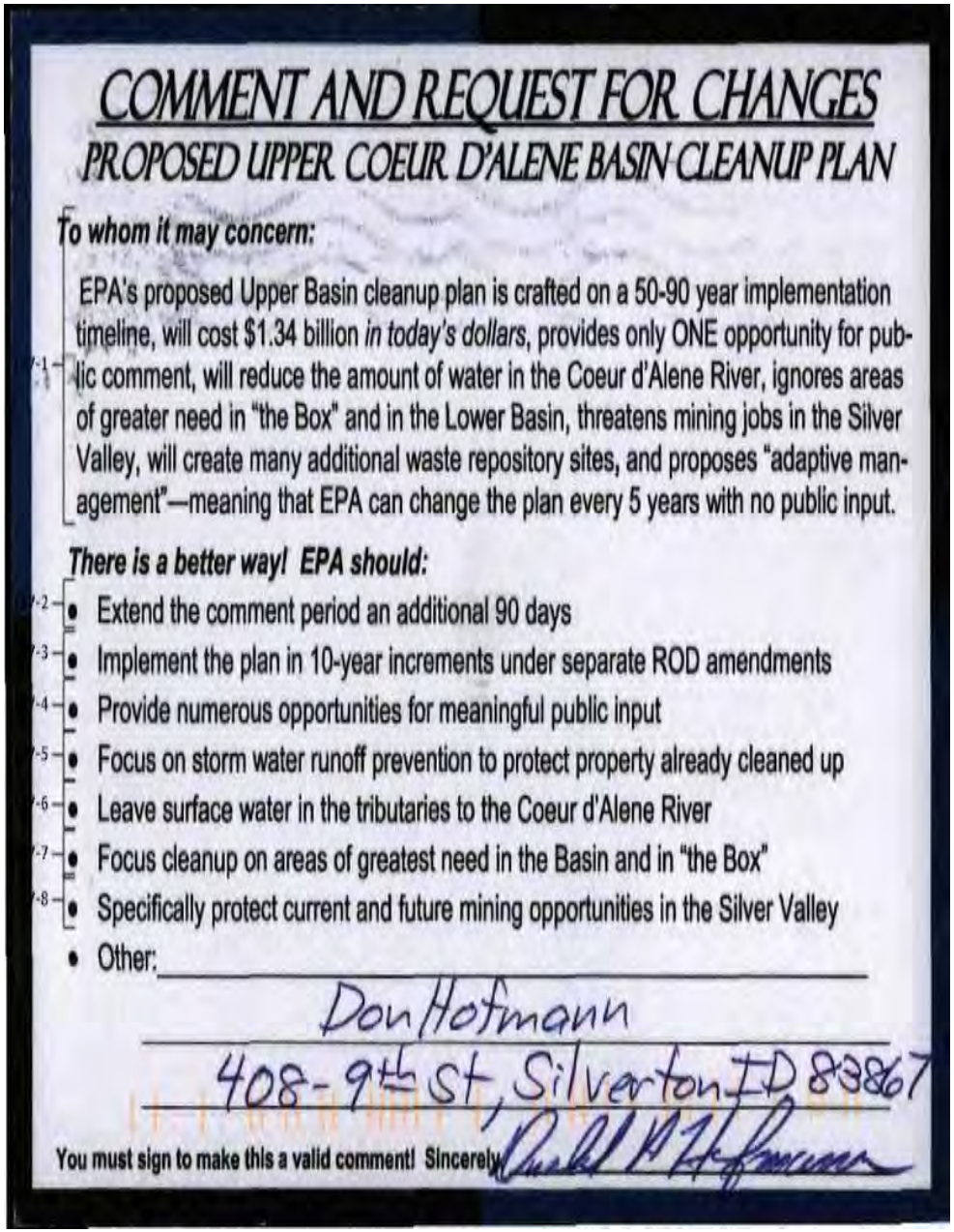
896737

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web4889.h... 8/10/2010

Response to comment I910-1

In 2005 and again in 2010, EPA and IDEQ evaluated potential exposures at the Pinehurst Golf Course. In both cases the Agencies determined that based on contaminant concentrations at the Golf Course and the recreational use of the property, unacceptable exposures were not occurring.

Hofmann, Don, I37, Letter 1357081



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I-2 Extend the comment period an additional 90 days
- I-3 Implement the plan in 10-year increments under separate ROD amendments
- I-4 Provide numerous opportunities for meaningful public input
- I-5 Focus on storm water runoff prevention to protect property already cleaned up
- I-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

Don Hofmann
408-9th St, Silverton ID 83867

You must sign to make this a valid comment! Sincerely, Donald W. Hofmann

Response to comment I37-1
See response to Comment No. I25-1.

Response to comment I37-2
See response to Comment No. I25-2.

Response to comment I37-3
See response to Comment No. I25-3.

Response to comment I37-4
See response to Comment No. I25-4.

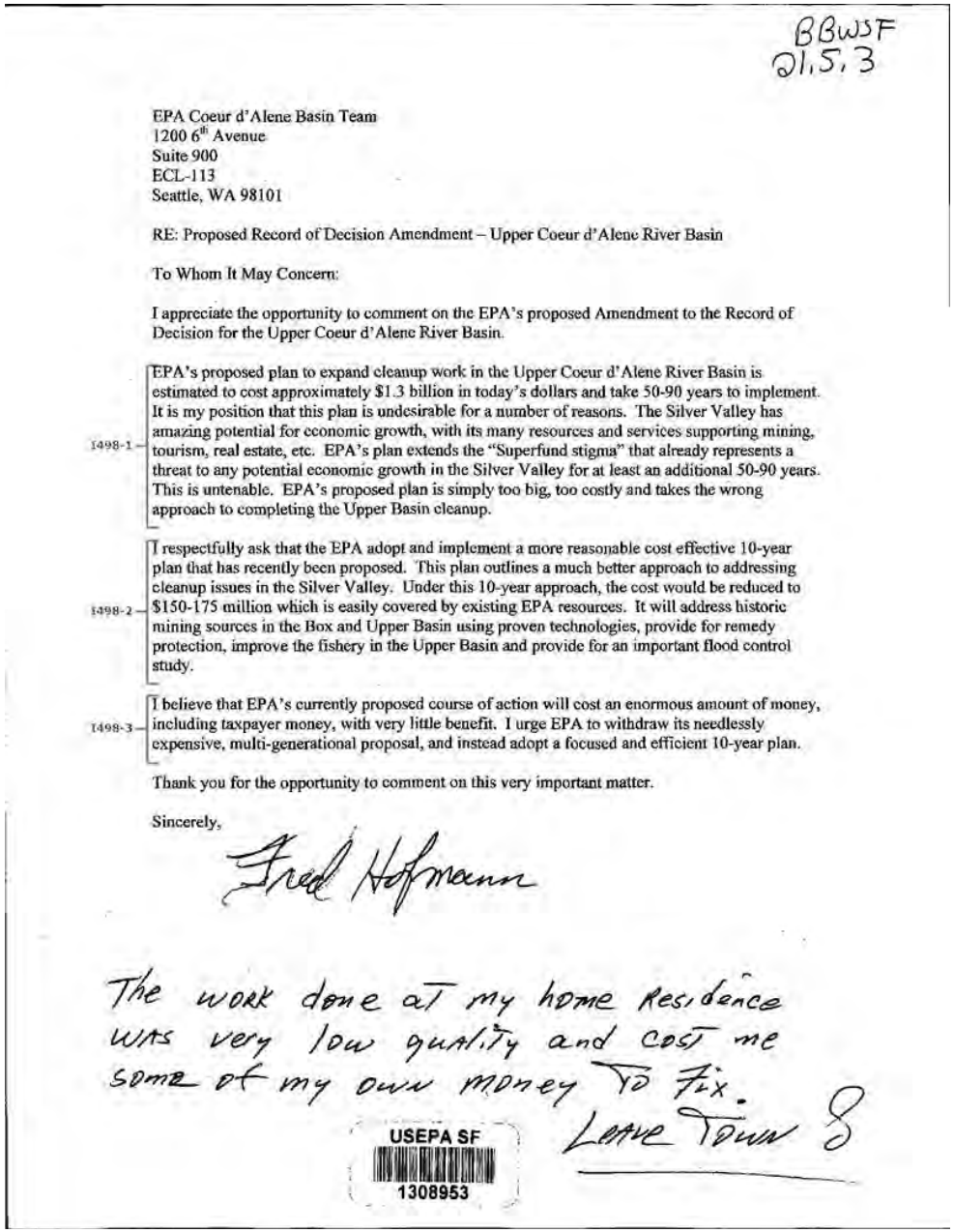
Response to comment I37-5
See response to Comment No. I25-5.

Response to comment I37-6
See response to Comment No. I25-6.

Response to comment I37-7
See response to Comment No. I25-7.

Response to comment I37-8
See response to Comment No. I25-8.

Hofmann, Fred, I498, Letter 1308953



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I498-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I498-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I498-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Fred Hofmann

The work done at my home Residence was very low quality and cost me some of my own money To Fix. Leave Town

USEPA SF
1308953

Response to comment I498-1

See response to Comment No. I474-1.

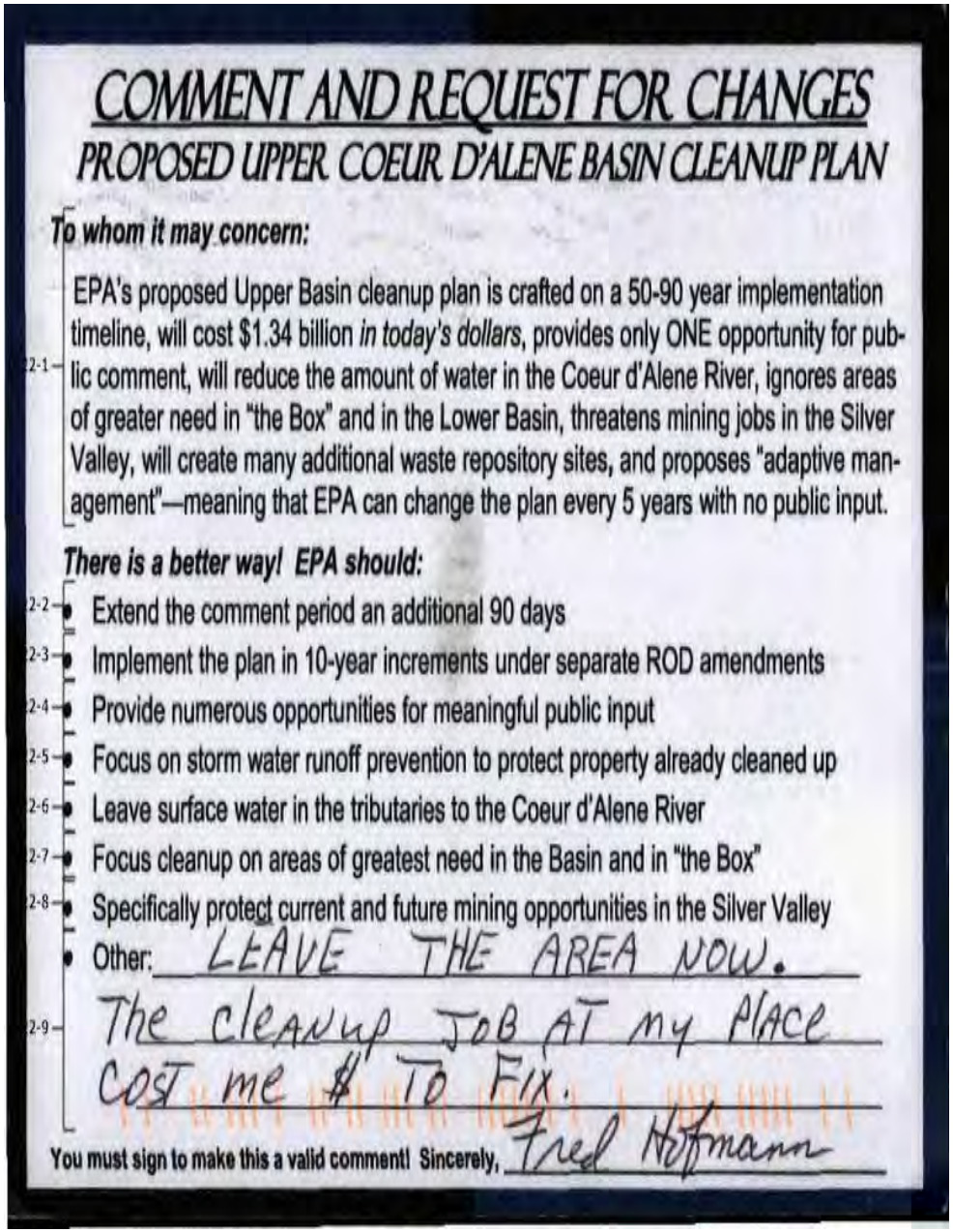
Response to comment I498-2

See response to Comment No. I474-2.

Response to comment I498-3

See response to Comment No. I474-3.

Hofmann, Fred, I522, Letter 1357784



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I522-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I522-2 Extend the comment period an additional 90 days
- I522-3 Implement the plan in 10-year increments under separate ROD amendments
- I522-4 Provide numerous opportunities for meaningful public input
- I522-5 Focus on storm water runoff prevention to protect property already cleaned up
- I522-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I522-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I522-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: LEAVE THE AREA NOW.

I522-9 The cleanup JOB AT my PLACE COST me $ TO FIX.

You must sign to make this a valid comment! Sincerely, Fred Hoffmann

Response to comment I522-1
See response to Comment No. I25-1.

Response to comment I522-2
See response to Comment No. I25-2.

Response to comment I522-3
See response to Comment No. I25-3.

Response to comment I522-4
See response to Comment No. I25-4.

Response to comment I522-5
See response to Comment No. I25-5.

Response to comment I522-6
See response to Comment No. I25-6.

Response to comment I522-7
See response to Comment No. I25-7.

Response to comment I522-8
See response to Comment No. I25-8.

Response to comment I522-9
Comment noted.

Hogamier, Scott, I383, Letter 616273

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
shogamier@hecla-mining.com to formsubmission 11/11/2010 01:09 PM
Sent by: Shogamier@Hecla-Mining.Com <shogamier=hecla-mining.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Scott Hogamier
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. Mining in the Silver Valley has a long history, by what the EPA is proposing will most certainly have an impact on the mining industry. Everyone in the valley is in one way or another connected to the mining industry. Our families have worked in the mines for decades. I would hate to think that my lively hood will be jeopardized by a governmental agency intent on protecting the health of citizens of the Silver Valley, when they have already cleaned up every yard in the valley. I believe that if the EPA wants to realy help the residents of the Silver Valley then they should at least listen to what the residents have been telling them. The EPA came in 20+ years ago and started a cleanup, they have done what they set out to do. It is clearly time to take a long look at the new ROD and see if it is really what this valley needs. When I was a kid, i fished the south fork of the Cd'A river for trout, always catching rainbows. Now I can walk down to the river and catch cutthroat trout. Any fish biologist anywhere in the nation will tell you that you need extremely clean water to support cutthroat trout. Apparently the south fork is clean enough. Thank you for allowing me to express my concerns on the proposed ROD.
Coeur d'Alene Basin Resident: Yes
Email Address: shogamier@hecla-mining.com
Mailing Address: PO Box 359, 320 Cameron Drive|Osburn|Idaho|83849|US
Phone Number: (208) 752-7085

I383-1
I383-2
I383-3
I383-4

616273

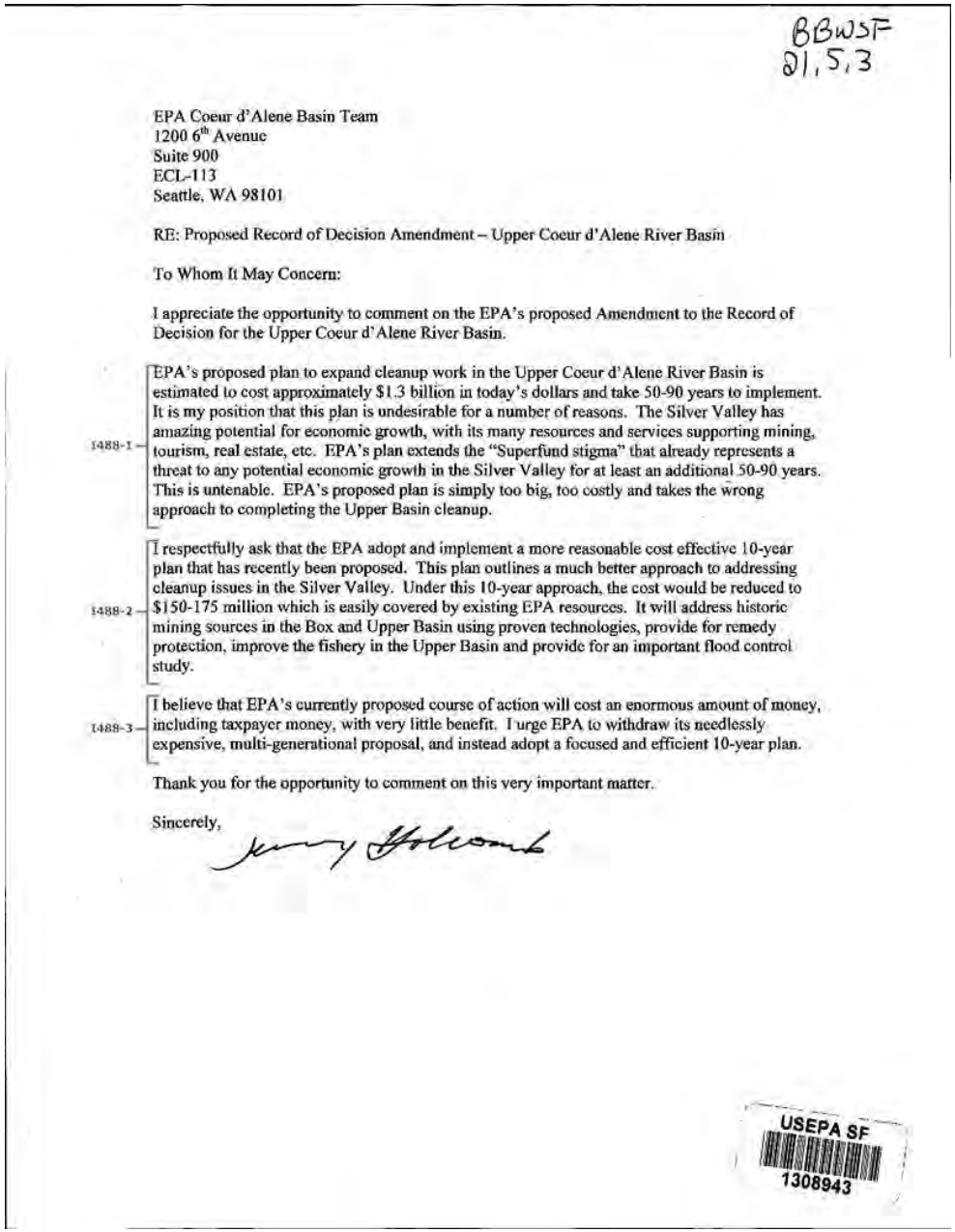
Response to comment I383-1
See response to Comment No. I351-1.

Response to comment I383-2
See response to Comment No. I58-5.

Response to comment I383-3
See response to Comment No. I295-2.

Response to comment I383-4
As described in the FFS, Proposed Plan and ROD Amendment, numerous studies have been conducted that document significant environmental problems, including impacts on fish, in the Upper Basin. The Selected Remedy is expected to make considerable progress in remedying these problems.

Holcomb, J., I488, Letter 1308943



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I488-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I488-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I488-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Jerry Holcomb

USEPA SF
1308943

Response to comment I488-1

See response to Comment No. I474-1.

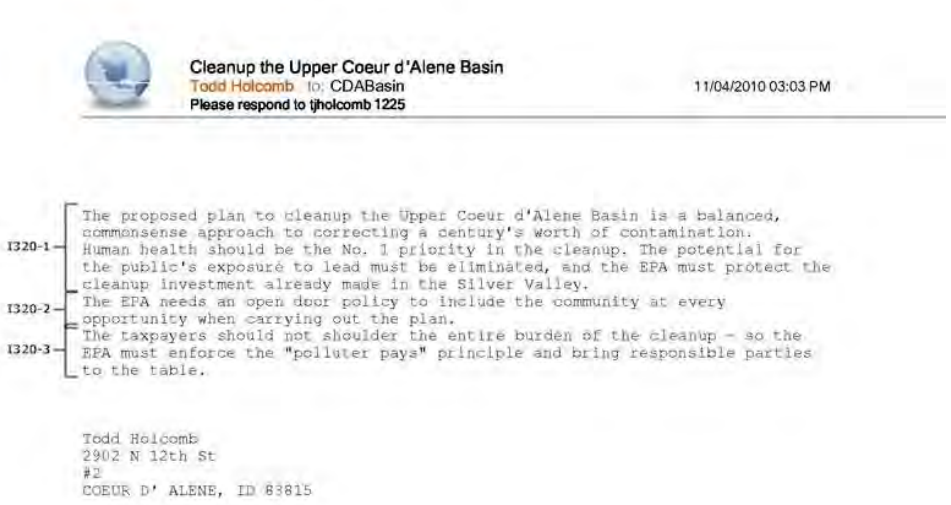
Response to comment I488-2

See response to Comment No. I474-2.

Response to comment I488-3

See response to Comment No. I474-3.

Holcomb, Todd, I320, Letter 614450



Cleanup the Upper Coeur d'Alene Basin
Todd Holcomb to: CDABasin 11/04/2010 03:03 PM
Please respond to tjholcomb 1225

I320-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I320-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I320-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Todd Holcomb
2902 N 12th St
#2
COEUR D' ALENE, ID 83815

614450

Response to comment I320-1

See response to Comment No. I295-1.

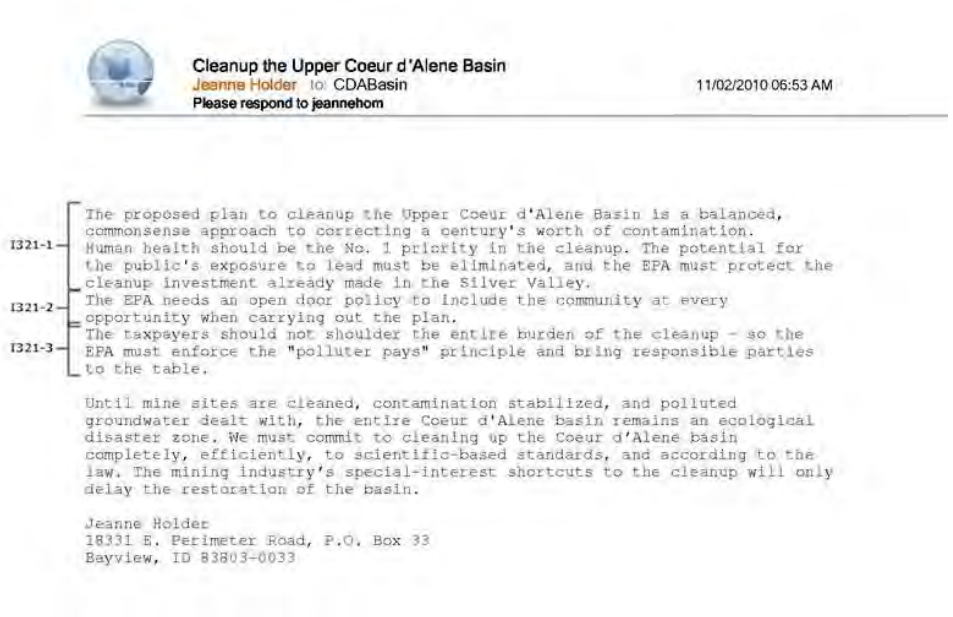
Response to comment I320-2

See response to Comment No. I295-2.

Response to comment I320-3

See response to Comment No. I295-3.

Holder, Jeanne, I321, Letter 614451



Cleanup the Upper Coeur d'Alene Basin
Jeanne Holder to: CDABasin 11/02/2010 06:53 AM
Please respond to jeannehom

I321-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I321-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I321-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Until mine sites are cleaned, contamination stabilized, and polluted groundwater dealt with, the entire Coeur d'Alene basin remains an ecological disaster zone. We must commit to cleaning up the Coeur d'Alene basin completely, efficiently, to scientific-based standards, and according to the law. The mining industry's special-interest shortcuts to the cleanup will only delay the restoration of the basin.

Jeanne Holder
18331 E. Perimeter Road, P.O. Box 33
Bayview, ID 83803-0033

614451

Response to comment I321-1

See response to Comment No. I295-1.

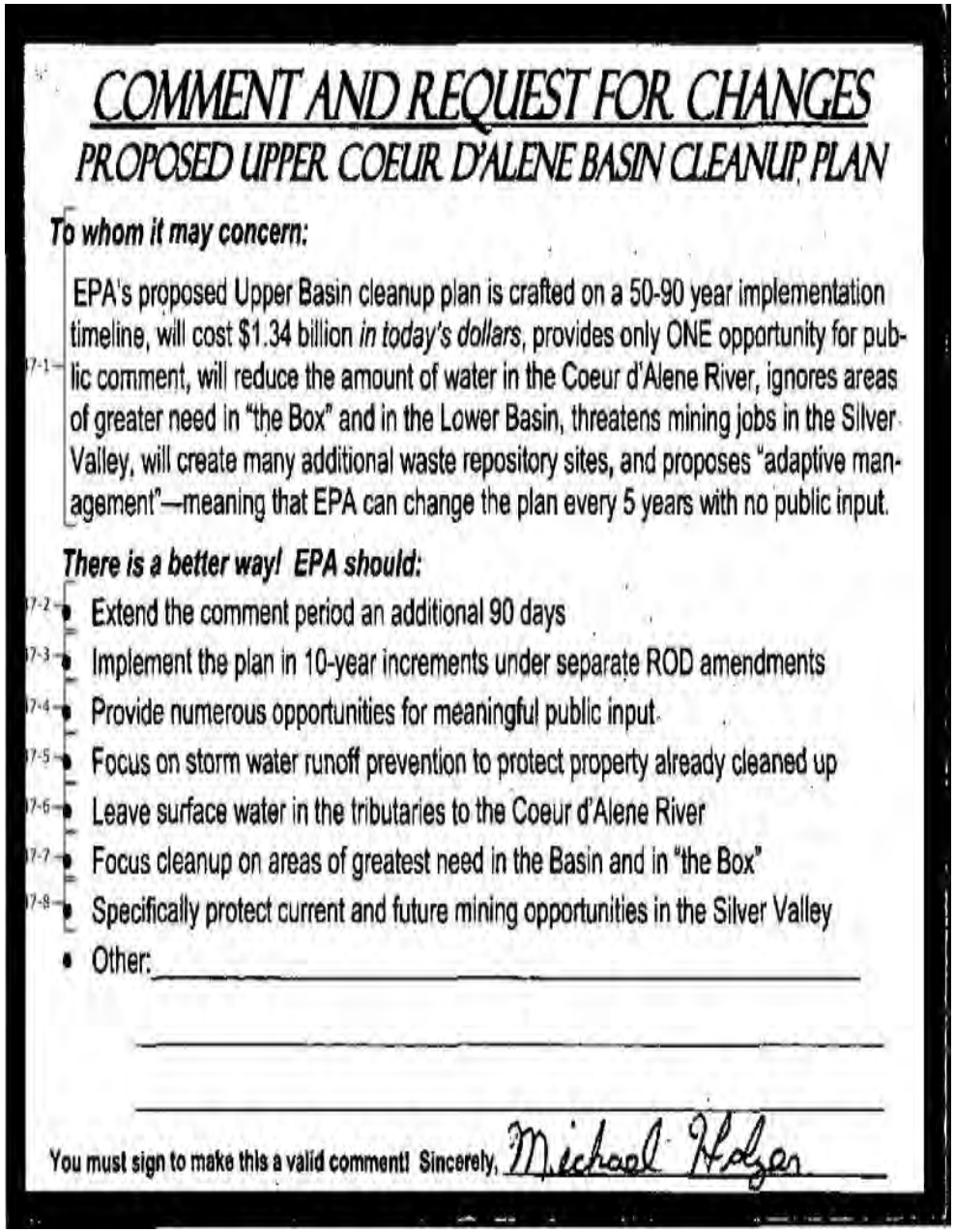
Response to comment I321-2

See response to Comment No. I295-2.

Response to comment I321-3

See response to Comment No. I295-3.

Holger, Michael, I147, Letter 1357283



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I47-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I47-2 Extend the comment period an additional 90 days
- I47-3 Implement the plan in 10-year increments under separate ROD amendments
- I47-4 Provide numerous opportunities for meaningful public input
- I47-5 Focus on storm water runoff prevention to protect property already cleaned up
- I47-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I47-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I47-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

_____

_____

You must sign to make this a valid comment! Sincerely, Michael Holger

Response to comment I147-1
See response to Comment No. I25-1.

Response to comment I147-2
See response to Comment No. I25-2.

Response to comment I147-3
See response to Comment No. I25-3.

Response to comment I147-4
See response to Comment No. I25-4.

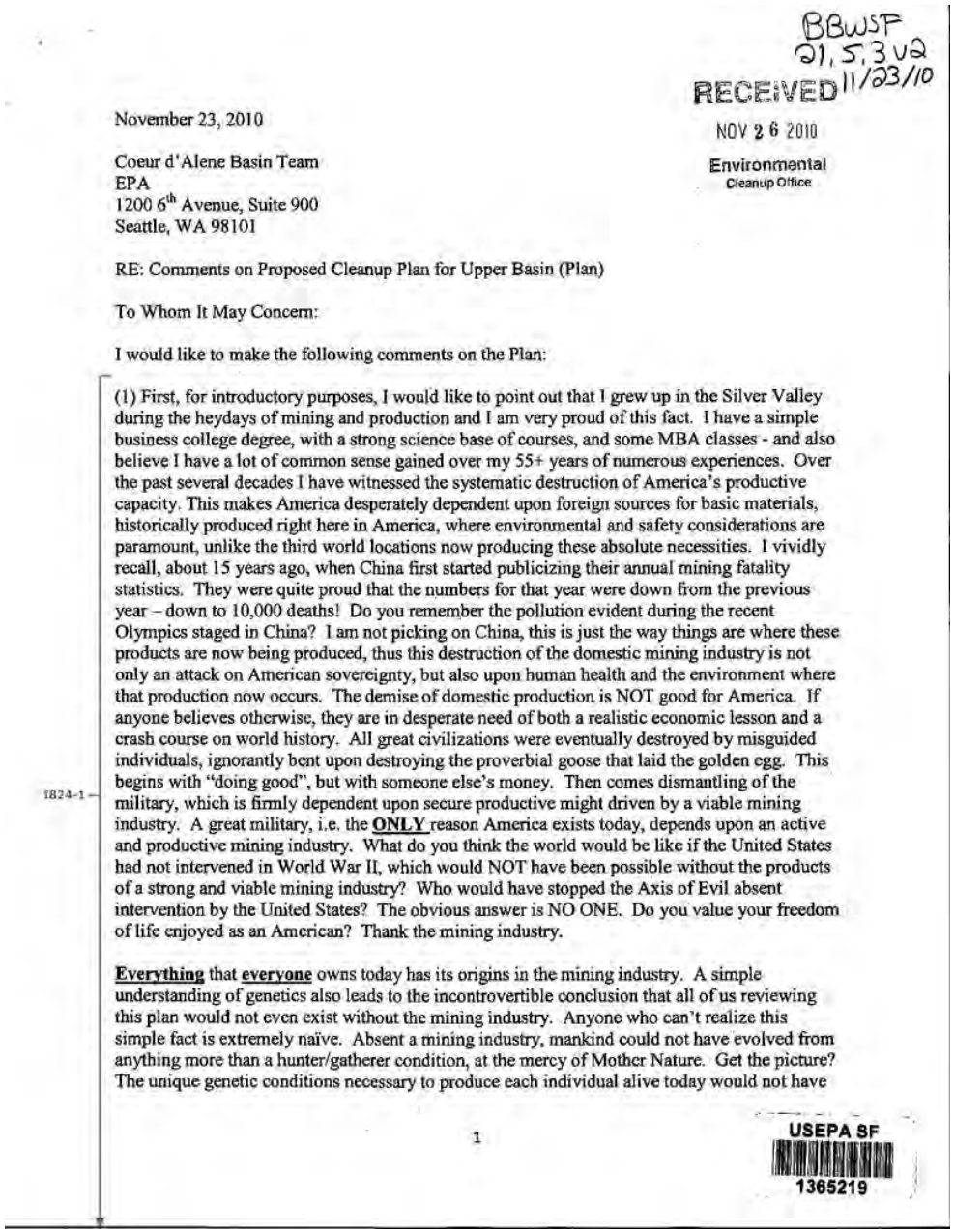
Response to comment I147-5
See response to Comment No. I25-5.

Response to comment I147-6
See response to Comment No. I25-6.

Response to comment I147-7
See response to Comment No. I25-7.

Response to comment I147-8
See response to Comment No. I25-8.

Holland, David E., I824, Letter 1365219



BBWSF
21.5.3 v2
11/23/10

RECEIVED
NOV 26 2010
Environmental
Cleanup Office

November 23, 2010

Coeur d'Alene Basin Team
EPA
1200 6th Avenue, Suite 900
Seattle, WA 98101

RE: Comments on Proposed Cleanup Plan for Upper Basin (Plan)

To Whom It May Concern:

I would like to make the following comments on the Plan:

(1) First, for introductory purposes, I would like to point out that I grew up in the Silver Valley during the heydays of mining and production and I am very proud of this fact. I have a simple business college degree, with a strong science base of courses, and some MBA classes - and also believe I have a lot of common sense gained over my 55+ years of numerous experiences. Over the past several decades I have witnessed the systematic destruction of America's productive capacity. This makes America desperately dependent upon foreign sources for basic materials, historically produced right here in America, where environmental and safety considerations are paramount, unlike the third world locations now producing these absolute necessities. I vividly recall, about 15 years ago, when China first started publicizing their annual mining fatality statistics. They were quite proud that the numbers for that year were down from the previous year – down to 10,000 deaths! Do you remember the pollution evident during the recent Olympics staged in China? I am not picking on China, this is just the way things are where these products are now being produced, thus this destruction of the domestic mining industry is not only an attack on American sovereignty, but also upon human health and the environment where that production now occurs. The demise of domestic production is NOT good for America. If anyone believes otherwise, they are in desperate need of both a realistic economic lesson and a crash course on world history. All great civilizations were eventually destroyed by misguided individuals, ignorantly bent upon destroying the proverbial goose that laid the golden egg. This begins with "doing good", but with someone else's money. Then comes dismantling of the military, which is firmly dependent upon secure productive might driven by a viable mining industry. A great military, i.e. the **ONLY** reason America exists today, depends upon an active and productive mining industry. What do you think the world would be like if the United States had not intervened in World War II, which would NOT have been possible without the products of a strong and viable mining industry? Who would have stopped the Axis of Evil absent intervention by the United States? The obvious answer is NO ONE. Do you value your freedom of life enjoyed as an American? Thank the mining industry.

I824-1

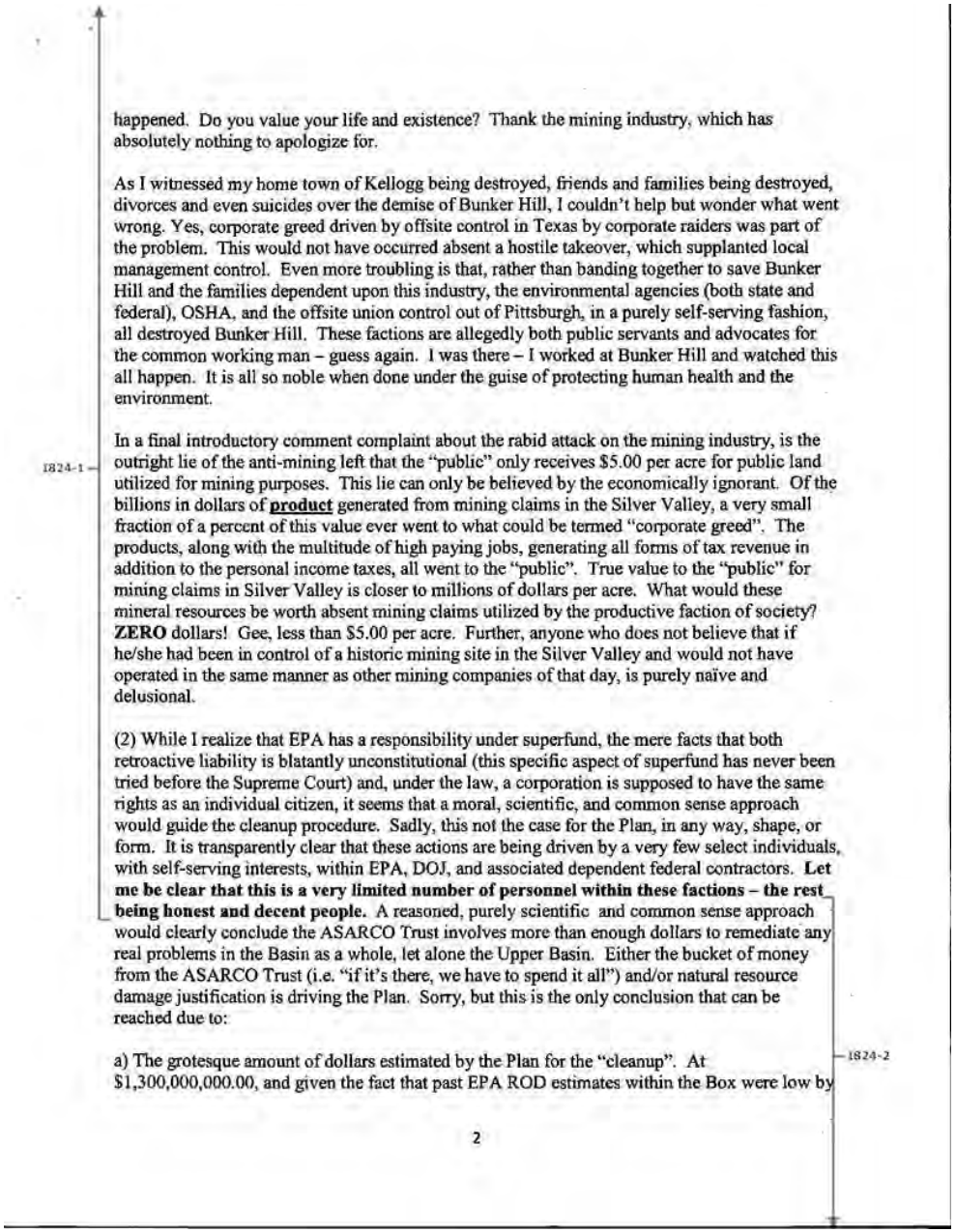
Everything that **everyone** owns today has its origins in the mining industry. A simple understanding of genetics also leads to the incontrovertible conclusion that all of us reviewing this plan would not even exist without the mining industry. Anyone who can't realize this simple fact is extremely naïve. Absent a mining industry, mankind could not have evolved from anything more than a hunter/gatherer condition, at the mercy of Mother Nature. Get the picture? The unique genetic conditions necessary to produce each individual alive today would not have

1

USEPA SF
1365219

Response to comment I824-1

Thank you for your comments. See response to Comment No. I58-5.



happened. Do you value your life and existence? Thank the mining industry, which has absolutely nothing to apologize for.

As I witnessed my home town of Kellogg being destroyed, friends and families being destroyed, divorces and even suicides over the demise of Bunker Hill, I couldn't help but wonder what went wrong. Yes, corporate greed driven by offsite control in Texas by corporate raiders was part of the problem. This would not have occurred absent a hostile takeover, which supplanted local management control. Even more troubling is that, rather than banding together to save Bunker Hill and the families dependent upon this industry, the environmental agencies (both state and federal), OSHA, and the offsite union control out of Pittsburgh, in a purely self-serving fashion, all destroyed Bunker Hill. These factions are allegedly both public servants and advocates for the common working man – guess again. I was there – I worked at Bunker Hill and watched this all happen. It is all so noble when done under the guise of protecting human health and the environment.

I824-1 In a final introductory comment complaint about the rabid attack on the mining industry, is the outright lie of the anti-mining left that the "public" only receives $5.00 per acre for public land utilized for mining purposes. This lie can only be believed by the economically ignorant. Of the billions in dollars of **product** generated from mining claims in the Silver Valley, a very small fraction of a percent of this value ever went to what could be termed "corporate greed". The products, along with the multitude of high paying jobs, generating all forms of tax revenue in addition to the personal income taxes, all went to the "public". True value to the "public" for mining claims in Silver Valley is closer to millions of dollars per acre. What would these mineral resources be worth absent mining claims utilized by the productive faction of society? **ZERO** dollars! Gee, less than $5.00 per acre. Further, anyone who does not believe that if he/she had been in control of a historic mining site in the Silver Valley and would not have operated in the same manner as other mining companies of that day, is purely naïve and delusional.

(2) While I realize that EPA has a responsibility under superfund, the mere facts that both retroactive liability is blatantly unconstitutional (this specific aspect of superfund has never been tried before the Supreme Court) and, under the law, a corporation is supposed to have the same rights as an individual citizen, it seems that a moral, scientific, and common sense approach would guide the cleanup procedure. Sadly, this not the case for the Plan, in any way, shape, or form. It is transparently clear that these actions are being driven by a very few select individuals, with self-serving interests, within EPA, DOJ, and associated dependent federal contractors. **Let me be clear that this is a very limited number of personnel within these factions – the rest being honest and decent people.** A reasoned, purely scientific and common sense approach would clearly conclude the ASARCO Trust involves more than enough dollars to remediate any real problems in the Basin as a whole, let alone the Upper Basin. Either the bucket of money from the ASARCO Trust (i.e. "if it's there, we have to spend it all") and/or natural resource damage justification is driving the Plan. Sorry, but this is the only conclusion that can be reached due to:

I824-2 a) The grotesque amount of dollars estimated by the Plan for the "cleanup". At $1,300,000,000.00, and given the fact that past EPA ROD estimates within the Box were low by

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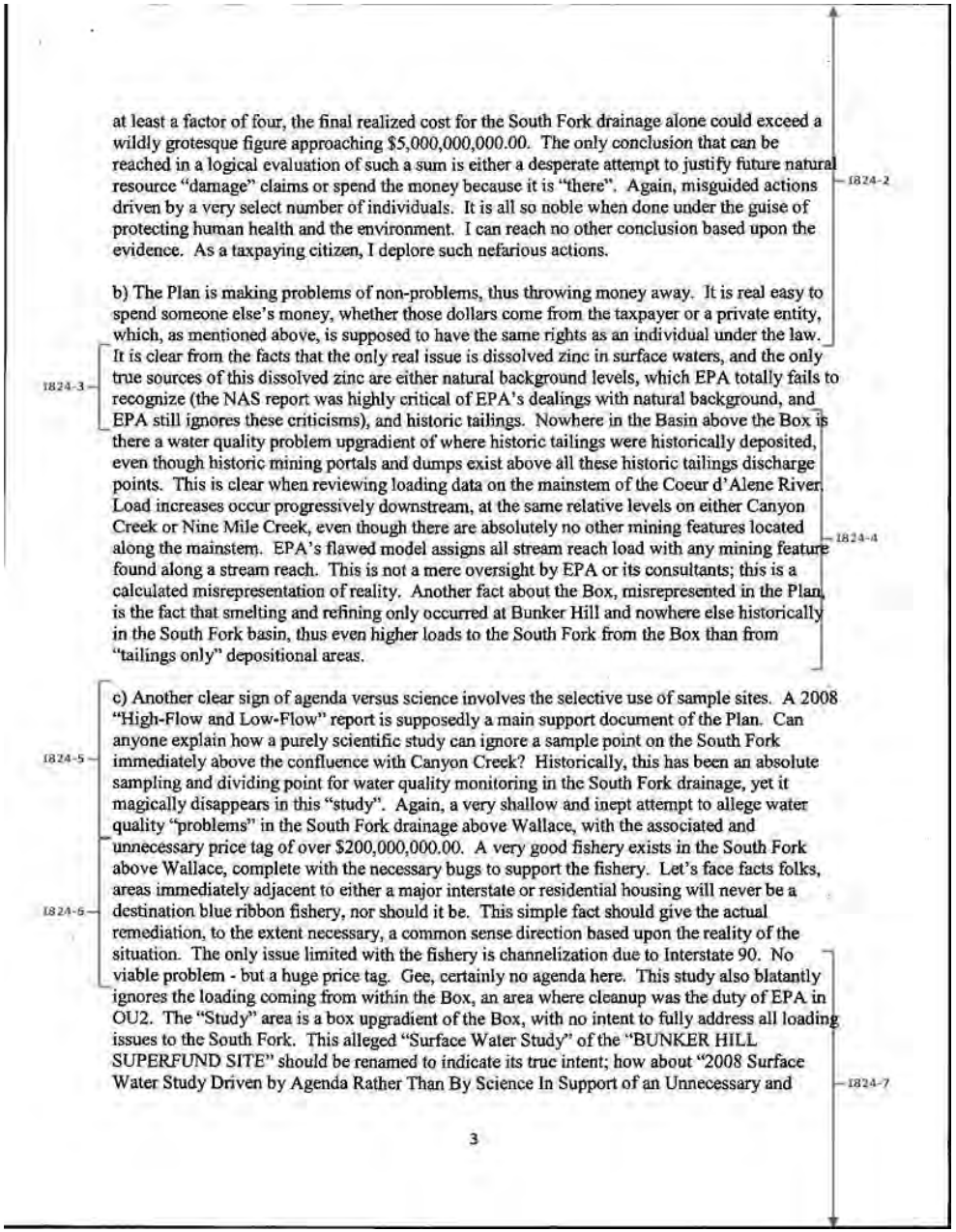
Response to comment I824-2

See responses to Comment Nos. I295-3 and I58-1.



at least a factor of four, the final realized cost for the South Fork drainage alone could exceed a wildly grotesque figure approaching $5,000,000,000.00. The only conclusion that can be reached in a logical evaluation of such a sum is either a desperate attempt to justify future natural resource "damage" claims or spend the money because it is "there". Again, misguided actions driven by a very select number of individuals. It is all so noble when done under the guise of protecting human health and the environment. I can reach no other conclusion based upon the evidence. As a taxpaying citizen, I deplore such nefarious actions. I824-2

b) The Plan is making problems of non-problems, thus throwing money away. It is real easy to spend someone else's money, whether those dollars come from the taxpayer or a private entity, which, as mentioned above, is supposed to have the same rights as an individual under the law.

I824-3 It is clear from the facts that the only real issue is dissolved zinc in surface waters, and the only true sources of this dissolved zinc are either natural background levels, which EPA totally fails to recognize (the NAS report was highly critical of EPA's dealings with natural background, and EPA still ignores these criticisms), and historic tailings. Nowhere in the Basin above the Box is there a water quality problem upgradient of where historic tailings were historically deposited, even though historic mining portals and dumps exist above all these historic tailings discharge points. This is clear when reviewing loading data on the mainstem of the Coeur d'Alene River. Load increases occur progressively downstream, at the same relative levels on either Canyon Creek or Nine Mile Creek, even though there are absolutely no other mining features located along the mainstem. EPA's flawed model assigns all stream reach load with any mining feature found along a stream reach. This is not a mere oversight by EPA or its consultants; this is a calculated misrepresentation of reality. Another fact about the Box, misrepresented in the Plan, is the fact that smelting and refining only occurred at Bunker Hill and nowhere else historically in the South Fork basin, thus even higher loads to the South Fork from the Box than from "tailings only" depositional areas. I824-4

c) Another clear sign of agenda versus science involves the selective use of sample sites. A 2008 "High-Flow and Low-Flow" report is supposedly a main support document of the Plan. Can

I824-5 anyone explain how a purely scientific study can ignore a sample point on the South Fork immediately above the confluence with Canyon Creek? Historically, this has been an absolute sampling and dividing point for water quality monitoring in the South Fork drainage, yet it magically disappears in this "study". Again, a very shallow and inept attempt to allege water quality "problems" in the South Fork drainage above Wallace, with the associated and unnecessary price tag of over $200,000,000.00. A very good fishery exists in the South Fork above Wallace, complete with the necessary bugs to support the fishery. Let's face facts folks,

I824-6 areas immediately adjacent to either a major interstate or residential housing will never be a destination blue ribbon fishery, nor should it be. This simple fact should give the actual remediation, to the extent necessary, a common sense direction based upon the reality of the situation. The only issue limited with the fishery is channelization due to Interstate 90. No viable problem - but a huge price tag. Gee, certainly no agenda here. This study also blatantly ignores the loading coming from within the Box, an area where cleanup was the duty of EPA in OU2. The "Study" area is a box upgradient of the Box, with no intent to fully address all loading issues to the South Fork. This alleged "Surface Water Study" of the "BUNKER HILL SUPERFUND SITE" should be renamed to indicate its true intent; how about "2008 Surface Water Study Driven by Agenda Rather Than By Science In Support of an Unnecessary and I824-7

3

Response to comment I824-3

See response to Comment No. LC33-8.

Response to comment I824-4

As described in the Proposed Plan and ROD Amendment, extensive and numerous studies have been conducted in the Coeur d'Alene Basin which document the adverse effects to the environment. The commenter is mistaken to the extent that he suggests discharges from mine portals and mine waste dumps do not contribute to surface water contamination. Depending on the locations, time, and metal concentration, these sources of contamination may contribute to problems even when the discharges occur upstream of locations where tailing were disposed of. It should be noted that EPA relies on actual water quality data and not the Predictive Analysis to characterize surface water quality. As to EPA's use of the Predictive Analysis to evaluate remedial alternatives, see response to comment LJ27-8. As noted in the ROD Amendment, Part 2, Section 14.0, The Selected Remedy contains significant changes from EPA's Preferred Alternative identified in the Upper Basin Proposed Plan (EPA, 2010, *Proposed Plan, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). These changes affect the remedial actions included in the Selected Remedy. No changes have been made to the remedy protection actions as identified in the Proposed Plan. In response to stakeholder and public comments, EPA has reduced the scope of the Selected Remedy and focused on prioritized actions that will be implemented over about a 30-year time frame.

Response to comment I824-5

In order to catch the "high" and the "low" flow event, samples had to be collected within a short period of time, so for this study EPA decided to sample stations that USGS monitors on a routine basis. The 2008 High-Flow and Low-Flow Surface Water Study Report was one of various studies that have been conducted to determine the nature and extent of contamination in the Upper Basin. Also see response to Comment No. I58-1. As described in the ROD Amendment, Part 2, Section 12, many of proposed remedial actions upstream of

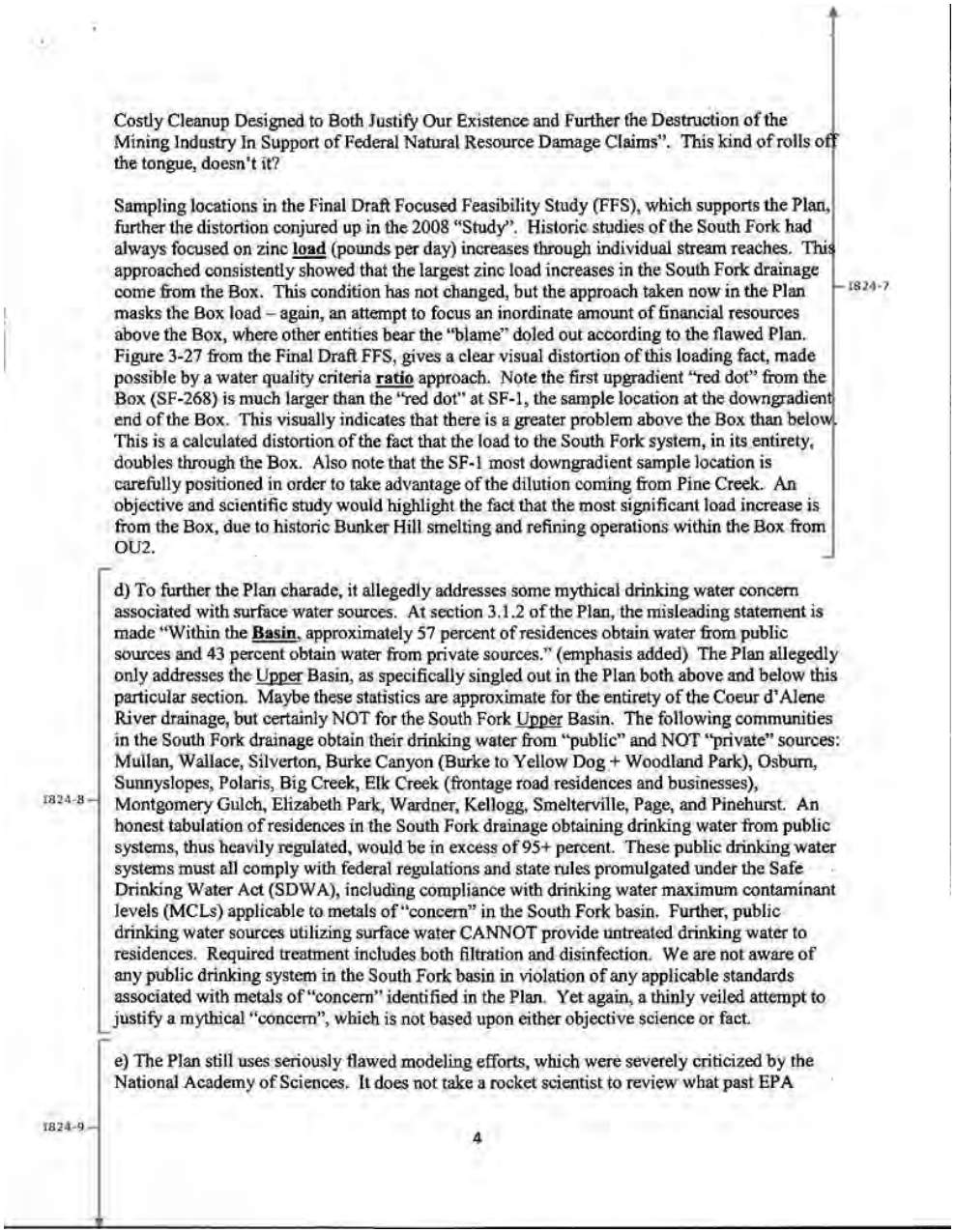
Wallace that were identified in the Preferred Alternative of the Proposed Plan have been excluded from the Selected Remedy.

Response to comment I824-6

Regarding the scope and cost of the Selected Remedy, see response to Comment No. I58-1.EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. As described in the ROD Amendment, the levels of contamination significantly exceed acceptable state and site-specific water quality standards.

Response to comment I824-7

As documented in the FFS, Proposed Plan and ROD Amendment, numerous studies have been conducted in the Upper Basin which document adverse effects to the environment caused by past mining, milling and smelting activities. The Box is indeed a significant contributor to these problems. As described in the ROD Amendment, Part 2, Section 12, considerable remedial work will be conducted in the Box as part of the Selected Remedy. Implementation of the Selected Remedy will significantly improve water quality in affected areas.



Costly Cleanup Designed to Both Justify Our Existence and Further the Destruction of the Mining Industry In Support of Federal Natural Resource Damage Claims". This kind of rolls off the tongue, doesn't it?

Sampling locations in the Final Draft Focused Feasibility Study (FFS), which supports the Plan, further the distortion conjured up in the 2008 "Study". Historic studies of the South Fork had always focused on zinc **load** (pounds per day) increases through individual stream reaches. This approached consistently showed that the largest zinc load increases in the South Fork drainage come from the Box. This condition has not changed, but the approach taken now in the Plan masks the Box load – again, an attempt to focus an inordinate amount of financial resources above the Box, where other entities bear the "blame" doled out according to the flawed Plan. Figure 3-27 from the Final Draft FFS, gives a clear visual distortion of this loading fact, made possible by a water quality criteria **ratio** approach. Note the first upgradient "red dot" from the Box (SF-268) is much larger than the "red dot" at SF-1, the sample location at the downgradient end of the Box. This visually indicates that there is a greater problem above the Box than below. This is a calculated distortion of the fact that the load to the South Fork system, in its entirety, doubles through the Box. Also note that the SF-1 most downgradient sample location is carefully positioned in order to take advantage of the dilution coming from Pine Creek. An objective and scientific study would highlight the fact that the most significant load increase is from the Box, due to historic Bunker Hill smelting and refining operations within the Box from OU2.

I824-7

d) To further the Plan charade, it allegedly addresses some mythical drinking water concern associated with surface water sources. At section 3.1.2 of the Plan, the misleading statement is made "Within the **Basin**, approximately 57 percent of residences obtain water from public sources and 43 percent obtain water from private sources." (emphasis added) The Plan allegedly only addresses the Upper Basin, as specifically singled out in the Plan both above and below this particular section. Maybe these statistics are approximate for the entirety of the Coeur d'Alene River drainage, but certainly NOT for the South Fork Upper Basin. The following communities in the South Fork drainage obtain their drinking water from "public" and NOT "private" sources: Mullan, Wallace, Silverton, Burke Canyon (Burke to Yellow Dog + Woodland Park), Osburn, Sunnyslopes, Polaris, Big Creek, Elk Creek (frontage road residences and businesses), Montgomery Gulch, Elizabeth Park, Wardner, Kellogg, Smelterville, Page, and Pinehurst. An honest tabulation of residences in the South Fork drainage obtaining drinking water from public systems, thus heavily regulated, would be in excess of 95+ percent. These public drinking water systems must all comply with federal regulations and state rules promulgated under the Safe Drinking Water Act (SDWA), including compliance with drinking water maximum contaminant levels (MCLs) applicable to metals of "concern" in the South Fork basin. Further, public drinking water sources utilizing surface water CANNOT provide untreated drinking water to residences. Required treatment includes both filtration and disinfection. We are not aware of any public drinking system in the South Fork basin in violation of any applicable standards associated with metals of "concern" identified in the Plan. Yet again, a thinly veiled attempt to justify a mythical "concern", which is not based upon either objective science or fact.

I824-8

e) The Plan still uses seriously flawed modeling efforts, which were severely criticized by the National Academy of Sciences. It does not take a rocket scientist to review what past EPA

I824-9

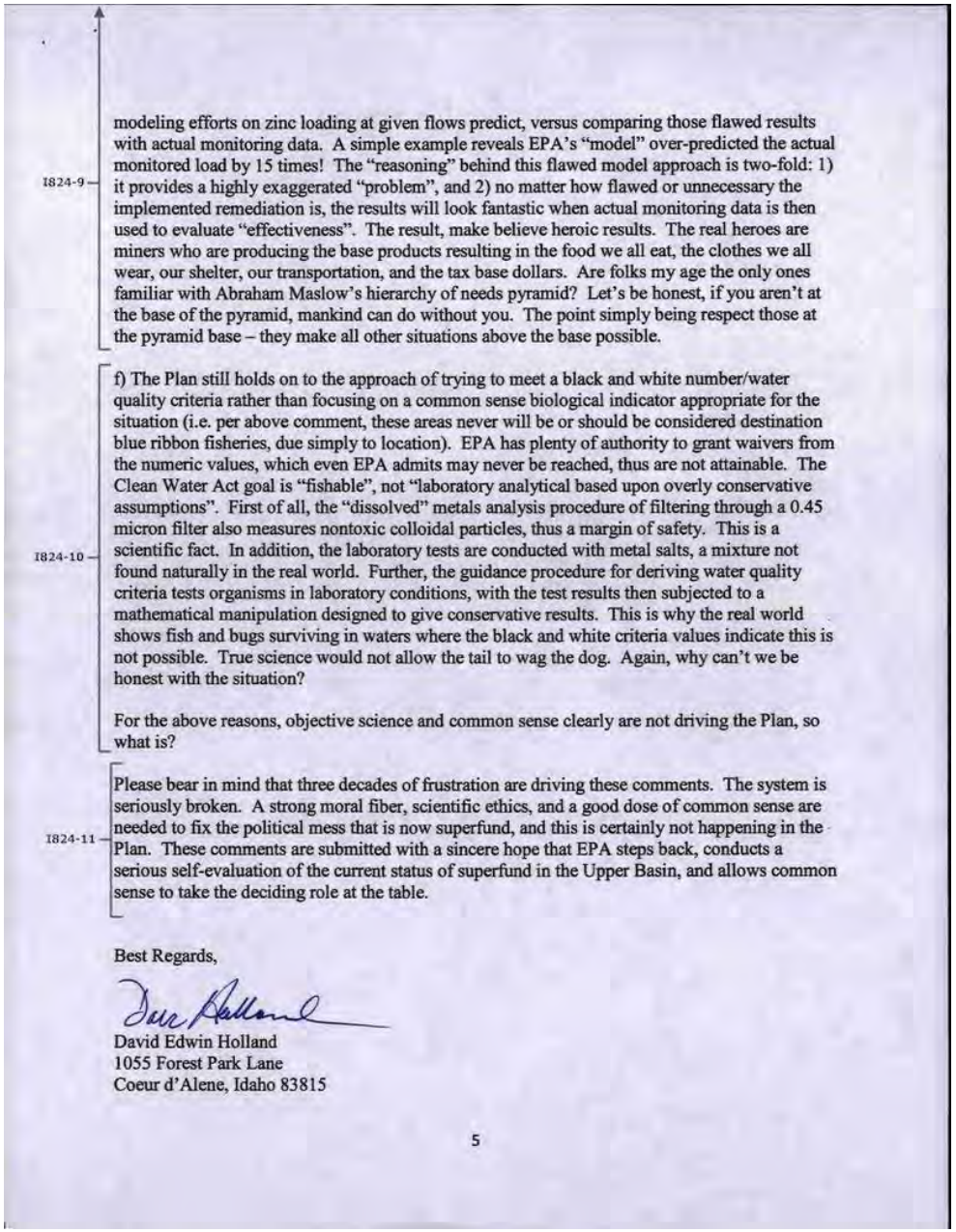
4

Response to comment I824-8

Granted that only a small percentage of residences may obtain water from private sources in the South Fork Upper Basin, the State of Idaho has identified drinking water as a designated beneficial use for the surface water of the Idaho portion of the Coeur d'Alene Basin. EPA is required by law to clean to the beneficial use designation. EPA has not focused its Selected Remedy on drinking water. In the case of the SFCDR, the applicable or relevant and appropriate requirements (ARARs) that will protect the environment include site-specific ambient water quality criteria. These criteria were developed by the State of Idaho to protect aquatic life. The water quality standards to protect the environment are more stringent than drinking water standards (i.e., maximum contaminant levels [MCLs]) for contaminants of concern in the Basin. (There is one exception -- mercury, as it has not been found to be prevalent in the Upper Basin.) Therefore, EPA believes that achieving ARARs will inherently have a potential drinking water benefit.

Response to comment I824-9

The remedy selection process was conducted in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. Also see response to Comment No. LJ27-8.



modeling efforts on zinc loading at given flows predict, versus comparing those flawed results with actual monitoring data. A simple example reveals EPA's "model" over-predicted the actual monitored load by 15 times! The "reasoning" behind this flawed model approach is two-fold: 1) I824-9 it provides a highly exaggerated "problem", and 2) no matter how flawed or unnecessary the implemented remediation is, the results will look fantastic when actual monitoring data is then used to evaluate "effectiveness". The result, make believe heroic results. The real heroes are miners who are producing the base products resulting in the food we all eat, the clothes we all wear, our shelter, our transportation, and the tax base dollars. Are folks my age the only ones familiar with Abraham Maslow's hierarchy of needs pyramid? Let's be honest, if you aren't at the base of the pyramid, mankind can do without you. The point simply being respect those at the pyramid base – they make all other situations above the base possible.

f) The Plan still holds on to the approach of trying to meet a black and white number/water quality criteria rather than focusing on a common sense biological indicator appropriate for the situation (i.e. per above comment, these areas never will be or should be considered destination blue ribbon fisheries, due simply to location). EPA has plenty of authority to grant waivers from the numeric values, which even EPA admits may never be reached, thus are not attainable. The Clean Water Act goal is "fishable", not "laboratory analytical based upon overly conservative assumptions". First of all, the "dissolved" metals analysis procedure of filtering through a 0.45 micron filter also measures nontoxic colloidal particles, thus a margin of safety. This is a I824-10 scientific fact. In addition, the laboratory tests are conducted with metal salts, a mixture not found naturally in the real world. Further, the guidance procedure for deriving water quality criteria tests organisms in laboratory conditions, with the test results then subjected to a mathematical manipulation designed to give conservative results. This is why the real world shows fish and bugs surviving in waters where the black and white criteria values indicate this is not possible. True science would not allow the tail to wag the dog. Again, why can't we be honest with the situation?

For the above reasons, objective science and common sense clearly are not driving the Plan, so what is?

Please bear in mind that three decades of frustration are driving these comments. The system is seriously broken. A strong moral fiber, scientific ethics, and a good dose of common sense are I824-11 needed to fix the political mess that is now superfund, and this is certainly not happening in the Plan. These comments are submitted with a sincere hope that EPA steps back, conducts a serious self-evaluation of the current status of superfund in the Upper Basin, and allows common sense to take the deciding role at the table.

Best Regards,

David Edwin Holland
1055 Forest Park Lane
Coeur d'Alene, Idaho 83815

5

Response to comment I824-10

See response to Comment No. SA4-13 regarding biological indicators. See response to Comment No. SA4-11 regarding EPA's ability to invoke ARAR waivers.

Response to comment I824-11

Thank you for your comment. Also, see response to Comment No. I58-1.

Hollenbeck, Ramona, I284, Letter 616015-49

going to be: history. As a college-educated person and with all the people - with all the intelligence that's just a glimpse of my life and the people in my life that have put blood, sweat and tears into this valley. All of family, 100 plus, has been involved in mining as either employees or investors and we all drink the water here.

Female: Yes. [Applause]

Mike Little: I have the privilege to continue the legacy of being involved in mining. I'm proud to work for a company that puts money and effort towards being compliant and meetings standards. I've seen the water filtration plant we've put online that has tested cleaner than this water we drink here. I personally tested it myself. The 90-year plan had many educated and qualified people working on it for two years, relying on 26 years of knowledge from what they've been doing already. Two years they had time to plan this, we get 90 days in rebuttal? It doesn't make sense. The 90-year plan with no public input or revisions of the progress besides the EPA's own adaptable management is wrong and it appears to be unconstitutional. There's no way that they could put a $1.3 billion price tag on the next 90 years. It's an impossibility to know what things are going to cost in the next 90 years. Myself, I've paid quite a bit of taxes. I have a well-paying job that I thank Lucky Friday for but as far as I'm concerned, I've paid over $12,000.00 in taxes in this year alone and when this $1.3 billion runs out, I'm going to probably end up paying a lot more than what I'm already paying taxes – an outside agency to continue here and coming here with this plan and kill off your people.

Ramona Hollenbeck: My parents came here 64 years ago on their way to Alaska. When they got to this beautiful valley they decided to stay. Daddy worked for [Page Mine] and he worked in [Blitz] and he loved it. It was autumn about twelve years ago when the EPA came to our house in Pinehurst and said, "That yard was hot." They didn't come back till spring and by then they didn't mention the yard. They mentioned that the gravel was hot. They made me take everything out the garage. Of course they didn't make me but I did it. Somebody had to [laughter], and they remediated the corner of First and Idaho where we lived in the corner in Pinehurst. About three feet they dug down and they remediated over

I284-1

Response to comment I284-1

See responses to Comment Nos. I295-1 and I295-3.

I284-1 to the roadway where my children play. They did not remediate the properties around us. Of course I questioned the ways of the EPA. Now after being told that we would have to do this, to sell our home, I was quiet. Now I learned that we may have to pay for unwanted services hung upon us. Please and thank you for helping us.

Katlyn Valerio: My family's livelihood in the past twelve years has rested on the mining industry in the valley. My father is miner and has been able to provide a stable life for my family of five. He is currently in the process of providing a college education for me and my sister. I have been employed by the Lucky Friday throughout the summers of my college education and have been able to provide and pay my way through college with the money and I'll be graduating this next May. My family and I enjoy living in the valley as it is. No matter where I travel, North Idaho is still one of the greatest places I have ever been. My family and I spend a lot of time in the outdoors and I will see the ill effects or pollution caused by mining that the EPA's always talking about. The health effects also caused by mining pollution are also something never heard about in Silver Valley. My family's livelihood has been provided through and by the mining industry in the valley. It'd be a shame for everything to be changed for reasons that we don't even need exist. Thank you.

Bob Colonna: I'm here to represent over 3,000 people that signed petitions over the past two years to stop the development of the Mission Viejo Mission Repository that is built through center of the flood point of floods every year. We've been the voice of over 3,000 people filling deaf ears. We've met with EPA on a national level as we always had on a regional level and I encourage the panel to look into this matter and specifically Chief Allan to take more of a serious stand and being at this an [exceptional liaison]. Excuse me, I'm trying to - I got Parkinson's. I think this matter needs – attention needs to be paid to this and we want delegation of this panel to look into this matter as soon as possible. We think it's time that we subject the national administrator of EPA to come visit this site and listen to the real experts who are the public and the stakeholders. They're the people that have to be listened to. I think EPA has a purpose. They need to listen and engage in the public much better than they had in this. Thank you.

No comments

Hollingsworth, Jim, I282, Letter 616015-47

Bob Hopper: There's nothing that I can say that'd actually be much different except a few points. Do you realize how much $1.34 billion is? Do you all think you can go to Pluto and beyond that? [Laughter] That's no joke. We've got a scientist right around here that is a head of the Pluto project. That's right. How much is the cost to be able to send the probe to Pluto and back? Is it all about $1.5 billion? Do we have any idea how much a $1.3 billion really is? Isn't there some sort of an agenda here that isn't it time that the real agenda came out? Well I've done what [they can] [laughter]. In all seriousness, we ought to think about number one, you get the hell out period. You think you're done with it? That's been said time and time again tonight but I'd like to say it again. The other point is what in the world is going on? Well we've talked about – another 50, 60 maybe 100 years - doesn't government always grow itself? Is this going to be the starting point for 200 years, 300 years and if you're [planning on moving to the city]? I'm not. [Your comments – they're already] [unintelligible]. Thank you very much.

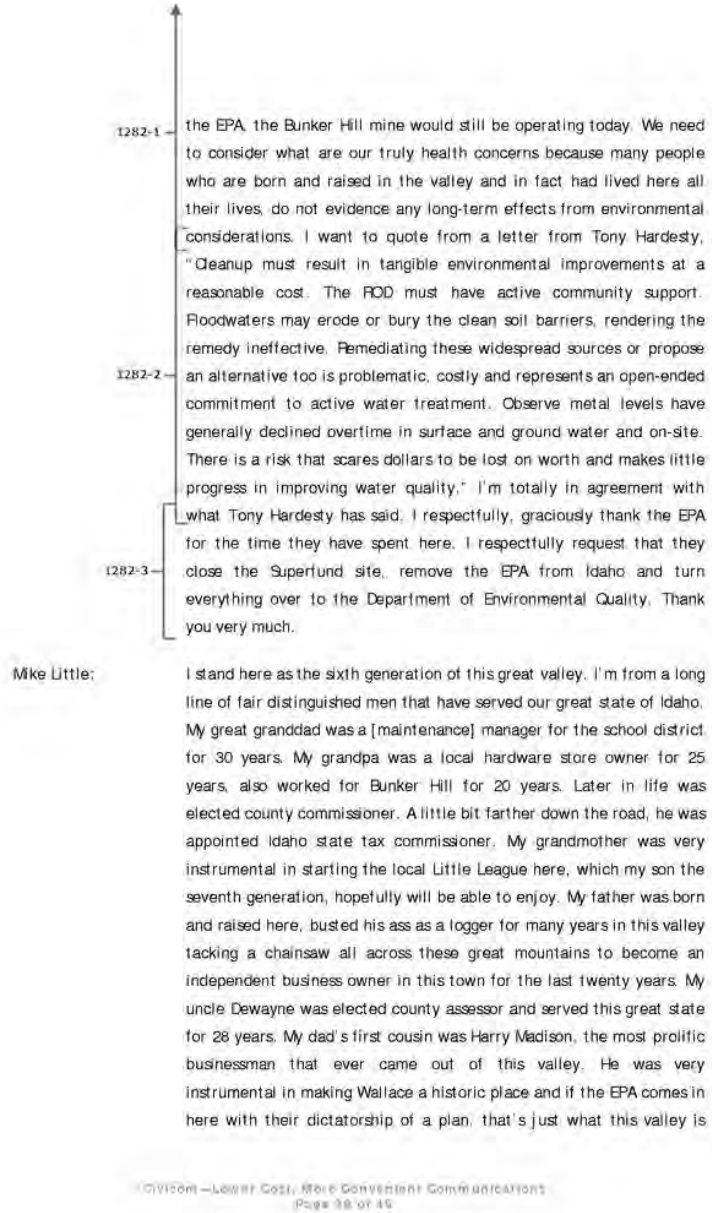
Laurel Christopher: There has been so much that has happened in this valley over the years and when the lady spoke of stress, she should have the opportunity of working with Bob Hopper [laughter] everyday and see the stress of the EPA's presence on him. I have no written comments so today I'm just a few extra, a few things. In the year 2000, two congressional hearings were held, one in Coeur d'Alene and one in Kellogg. The people then were testifying to our Congress - congressionals and to the EPA Ombudsman. I honestly thought the valuable information given to them would actually stop the fraud and here we are with the same, same problems that we're trying to get resolved and the fraud continues. Now I just want to take one second. Thank you. I'm so sorry, but as far as needing 100 years to move dirt from one location to another in our valley, that makes me sick. Because during the 1960s, when I was a teenager, all our dreams and all our hopes were on reaching the moon and you know this US government and NASA managed not only to reach the moon, but they had people walking on the moon by the end of the 1960s. So what are they going to do for 100 years? They've already been here three times longer than it took us to get to the moon.

Jim Hollingsworth: Gentlemen, my stress with the EPA goes back to the years I worked with the Bunker Hill Company. I firmly believe that if it were not for

I282-1

Response to comment I282-1

See response to Comment No. I295-1.



I282-1 the EPA, the Bunker Hill mine would still be operating today. We need to consider what are our truly health concerns because many people who are born and raised in the valley and in fact had lived here all their lives, do not evidence any long-term effects from environmental considerations. I want to quote from a letter from Tony Hardesty, "Cleanup must result in tangible environmental improvements at a reasonable cost. The ROD must have active community support. Floodwaters may erode or bury the clean soil barriers, rendering the remedy ineffective. Remediating these widespread sources or propose I282-2 an alternative too is problematic, costly and represents an open-ended commitment to active water treatment. Observe metal levels have generally declined overtime in surface and ground water and on-site. There is a risk that scares dollars to be lost on worth and makes little progress in improving water quality." I'm totally in agreement with what Tony Hardesty has said. I respectfully, graciously thank the EPA for the time they have spent here. I respectfully request that they I282-3 close the Superfund site, remove the EPA from Idaho and turn everything over to the Department of Environmental Quality. Thank you very much.

Mike Little: I stand here as the sixth generation of this great valley. I'm from a long line of fair distinguished men that have served our great state of Idaho. My great granddad was a [maintenance] manager for the school district for 30 years. My grandpa was a local hardware store owner for 25 years, also worked for Bunker Hill for 20 years. Later in life was elected county commissioner. A little bit farther down the road, he was appointed Idaho state tax commissioner. My grandmother was very instrumental in starting the local Little League here, which my son the seventh generation, hopefully will be able to enjoy. My father was born and raised here, busted his ass as a logger for many years in this valley tacking a chainsaw all across these great mountains to become an independent business owner in this town for the last twenty years. My uncle Dewayne was elected county assessor and served this great state for 28 years. My dad's first cousin was Harry Madison, the most prolific businessman that ever came out of this valley. He was very instrumental in making Wallace a historic place and if the EPA comes in here with their dictatorship of a plan, that's just what this valley is

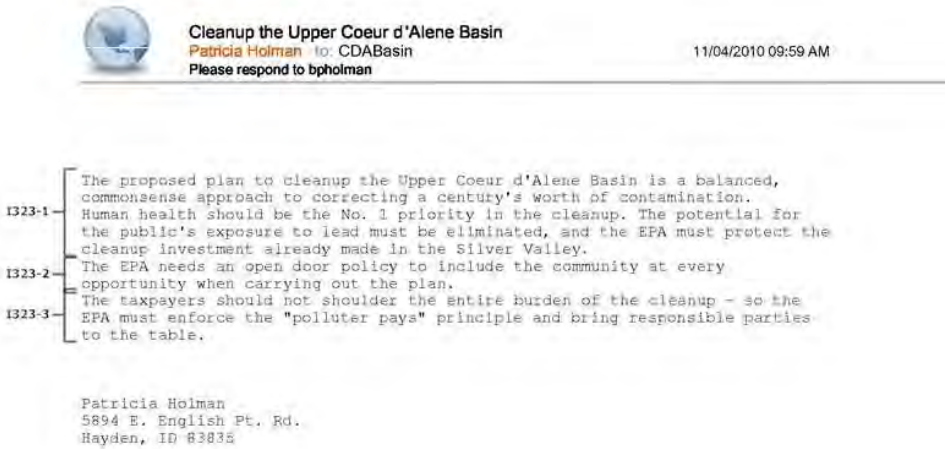
Response to comment I282-2

Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediments, groundwater, and surface water that poses unacceptable risks to people, wildlife, and the environment. The levels of contamination significantly exceed acceptable state and site-specific water quality standards. Under the Superfund Law, EPA has a responsibility and obligation to take actions to protect human health and the environment. As described in the responses to Comment Nos. I58-1 and I295-3 EPA has reduced the scope, and hence the cost, of the Selected Remedy and entered into settlements with mining companies regarding paying for cleanup. This cleanup which addresses prioritized sources of contamination was developed in a collaborative manner with the public, as described in the response to Comment No. I295-2. The Selected Remedy also includes remedy protection actions to protect remediated properties from SFCDR tributary stormwater runoff. EPA worked collaboratively with IDEQ to develop and evaluate remedy protection alternatives in the Focused Feasibility Study (FFS). The Selected Remedy includes specific mitigation actions (referred to as remedy protection projects) within the primary Upper Basin communities (Pinehurst, Smelterville, Kellogg, Wardner, Osburn, Silverton, Wallace, and Mullan) to protect existing Selected Human Remedies at risk from recontamination.

Response to comment I282-3

Thank you for your comments.

Holman, Patricia, I323, Letter 614453



Cleanup the Upper Coeur d'Alene Basin
Patricia Holman to: CDABasin 11/04/2010 09:59 AM
Please respond to bpholman

I323-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I323-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I323-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Patricia Holman
5894 E. English Pt. Rd.
Hayden, ID 83835

614453

Response to comment I323-1

See response to Comment No. I295-1.

Response to comment I323-2

See response to Comment No. I295-2.

Response to comment I323-3

See response to Comment No. I295-3.

Hood, Ron, I209, Letter 610097-4

percent agree that you guys have done a really fine job so far, and we really thank you for that. The Valley looks wonderful and there's fish in the streams. I know my fisherman friend over there has caught some big ones, and he'd love to tell you about it.

Well, for one thing, I don't think we can afford this right now. And, two, the Valley's beautiful just the way it is. And I think everybody here will pretty much agree to just leave it alone; leave it the way it is. We're fine, we're all happy with it.

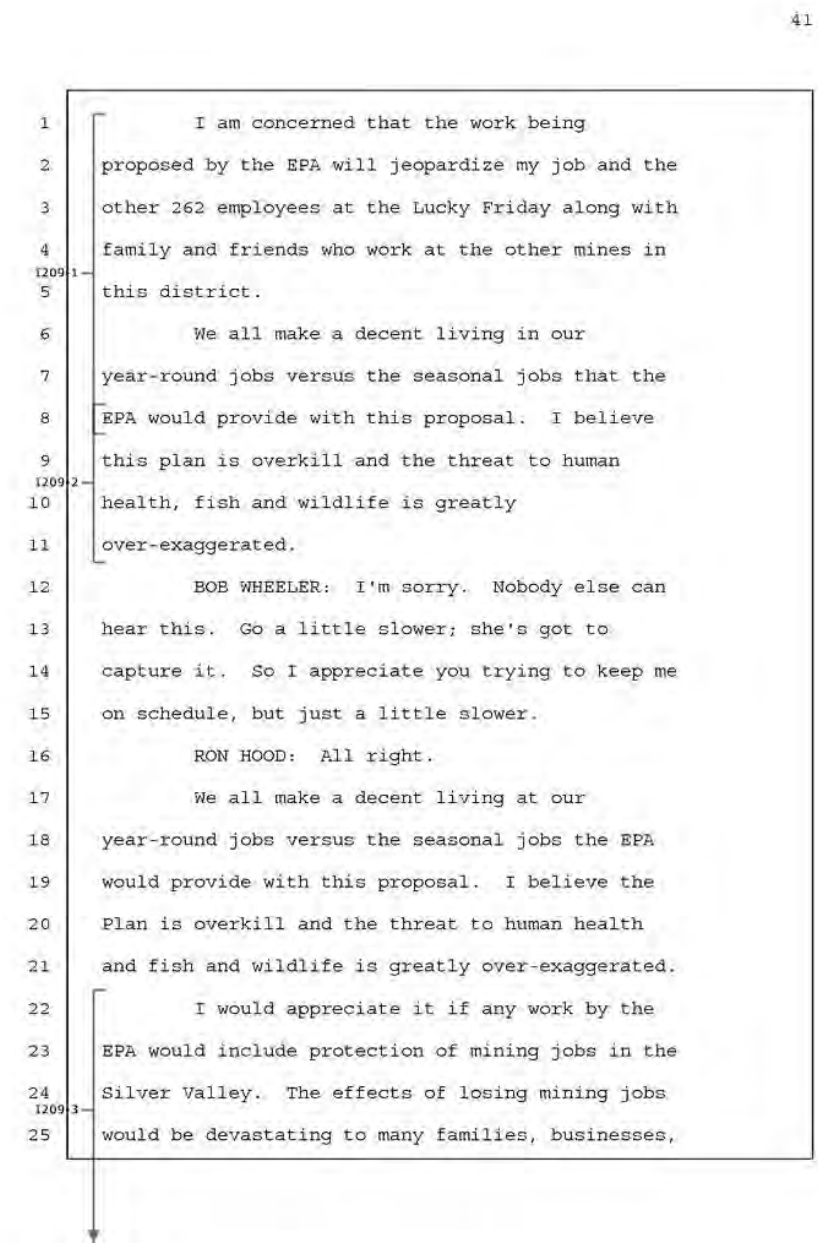
And that's about all I've got. I don't have much.

BOB WHEELER: Thank you. You are saving us some time. Thank you, Ray. Appreciate that.

Ron Hood, please, is coming on up. And after that is Frank McGee. If you'd get ready. And then Michael Dunnigan.

RON HOOD: Can you hear me okay? Hi. My name is Ron Hood. I work in the mill department of the Lucky Friday mine in Mullan. We have 44 employees in the mill department. I also have a nephew, several cousins, as well as my wife's family that work in the mining industry here.

No comments



41

I am concerned that the work being proposed by the EPA will jeopardize my job and the other 262 employees at the Lucky Friday along with family and friends who work at the other mines in this district. I209-1

We all make a decent living in our year-round jobs versus the seasonal jobs that the EPA would provide with this proposal. I believe this plan is overkill and the threat to human health, fish and wildlife is greatly over-exaggerated. I209-2

BOB WHEELER: I'm sorry. Nobody else can hear this. Go a little slower; she's got to capture it. So I appreciate you trying to keep me on schedule, but just a little slower.

RON HOOD: All right.

We all make a decent living at our year-round jobs versus the seasonal jobs the EPA would provide with this proposal. I believe the Plan is overkill and the threat to human health and fish and wildlife is greatly over-exaggerated.

I would appreciate it if any work by the EPA would include protection of mining jobs in the Silver Valley. The effects of losing mining jobs would be devastating to many families, businesses, I209-3

Response to comment I209-1

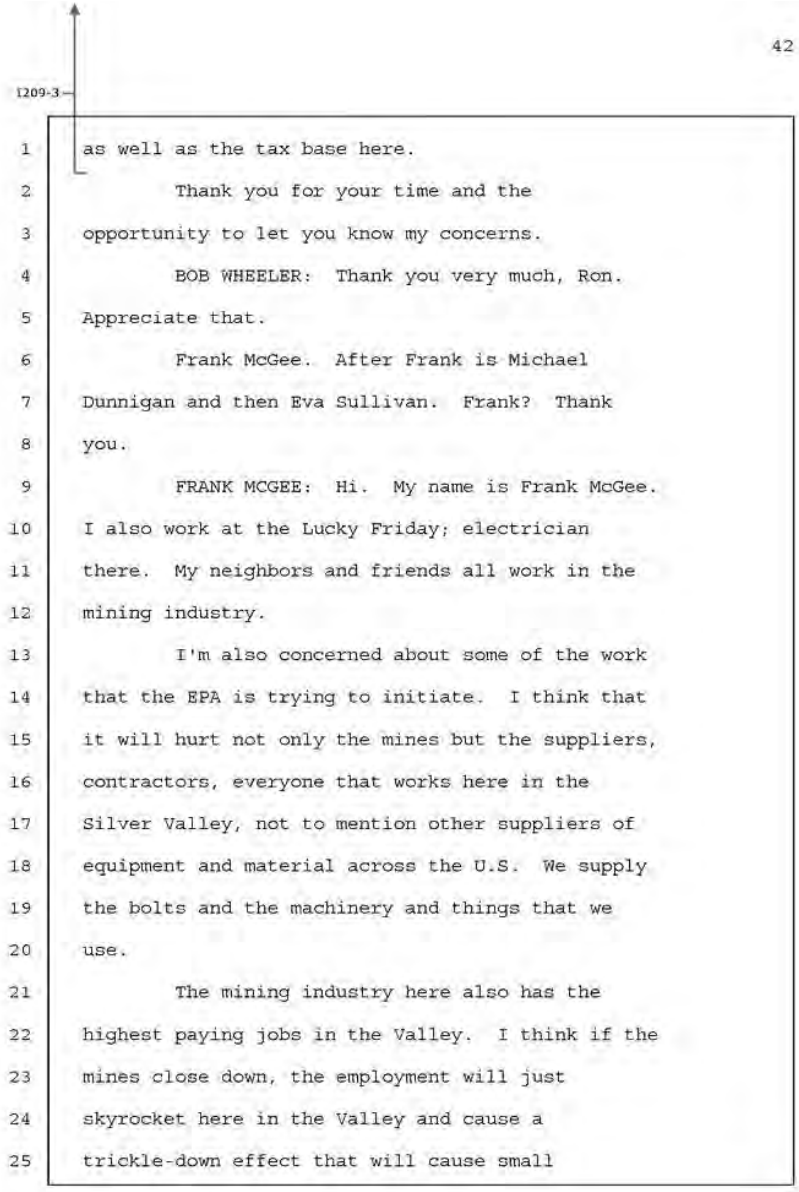
See response to Comment No. I58-5.

Response to comment I209-2

The FFS, Proposed Plan and ROD Amendment were developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. As documented in the ROD Amendment, while significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. Regarding the reduced scope of the Selected Remedy, see response to Comment No. I58-1.

Response to comment I209-3

See response to Comment No. I58-5.



42

I209-3

as well as the tax base here.

Thank you for your time and the opportunity to let you know my concerns.

BOB WHEELER: Thank you very much, Ron. Appreciate that.

Frank McGee. After Frank is Michael Dunnigan and then Eva Sullivan. Frank? Thank you.

FRANK MCGEE: Hi. My name is Frank McGee. I also work at the Lucky Friday; electrician there. My neighbors and friends all work in the mining industry.

I'm also concerned about some of the work that the EPA is trying to initiate. I think that it will hurt not only the mines but the suppliers, contractors, everyone that works here in the Silver Valley, not to mention other suppliers of equipment and material across the U.S. We supply the bolts and the machinery and things that we use.

The mining industry here also has the highest paying jobs in the Valley. I think if the mines close down, the employment will just skyrocket here in the Valley and cause a trickle-down effect that will cause small

No comments

Houchin, Mark, I384, Letter 616274

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
w.houchin@usamedia.tv to: formsubmission 11/11/2010 01:33 PM
Sent by: W.Houchin@Usamedia.Tv <w.houchin=usamedia.tv

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

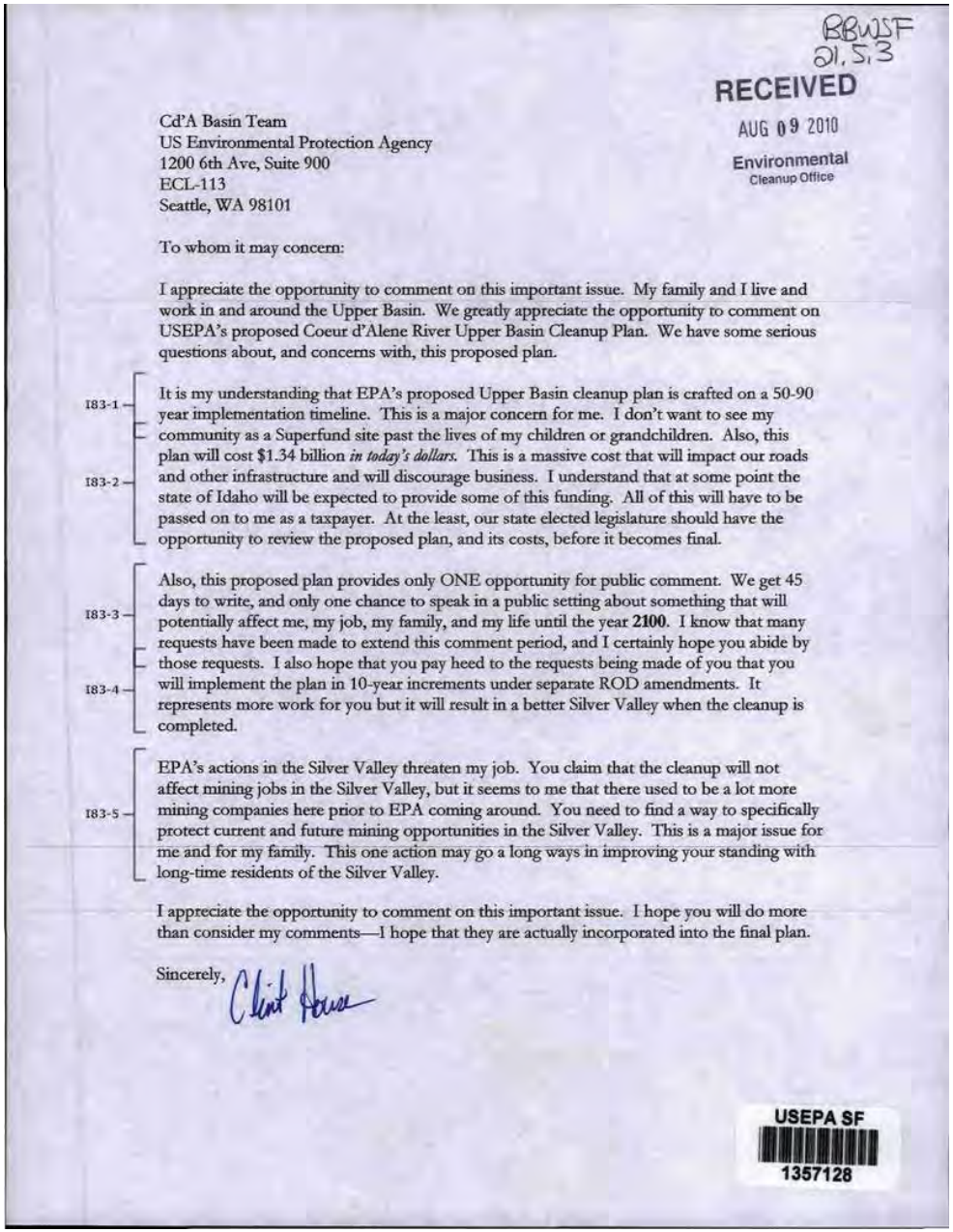
From: MARK HOUCHIN
Date: 11/20/1956
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I384-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: w.houchin@usamedia.tv
Mailing Address: 149 KING ST.|WALLACE|IDAHO|83873|US
Phone Number:

616274

Response to comment I384-1

See response to Comment No. I351-1.

House, Clint, I83, Letter 1357128



BBWSF
21,5,3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I83-1, I83-2 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I83-3, I83-4 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I83-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,
Clint House

USEPA SF
1357128

Response to comment I83-1
See response to Comment No. I58-1.

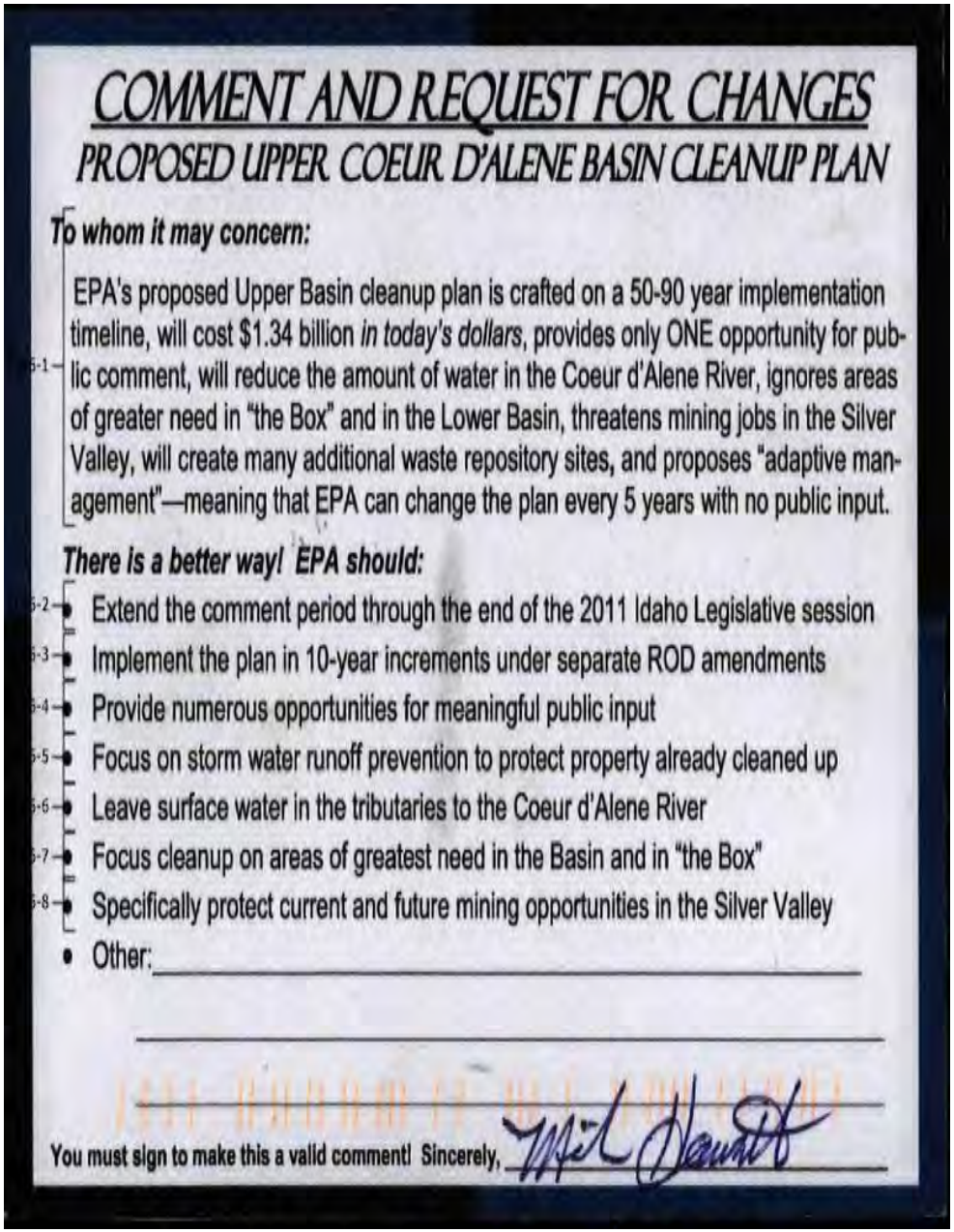
Response to comment I83-2
See response to Comment No. I58-2.

Response to comment I83-3
See response to Comment No. I58-3.

Response to comment I83-4
See response to Comment No. I58-4.

Response to comment I83-5
See response to Comment No. I58-5.

Howalt, Mike, I196, Letter 1357508



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I196-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I196-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I196-3 Implement the plan in 10-year increments under separate ROD amendments
- I196-4 Provide numerous opportunities for meaningful public input
- I196-5 Focus on storm water runoff prevention to protect property already cleaned up
- I196-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I196-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I196-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Mike Howalt

Response to comment I196-1
See response to Comment No. I25-1.

Response to comment I196-2
See response to Comment No. I25-2.

Response to comment I196-3
See response to Comment No. I25-3.

Response to comment I196-4
See response to Comment No. I25-4.

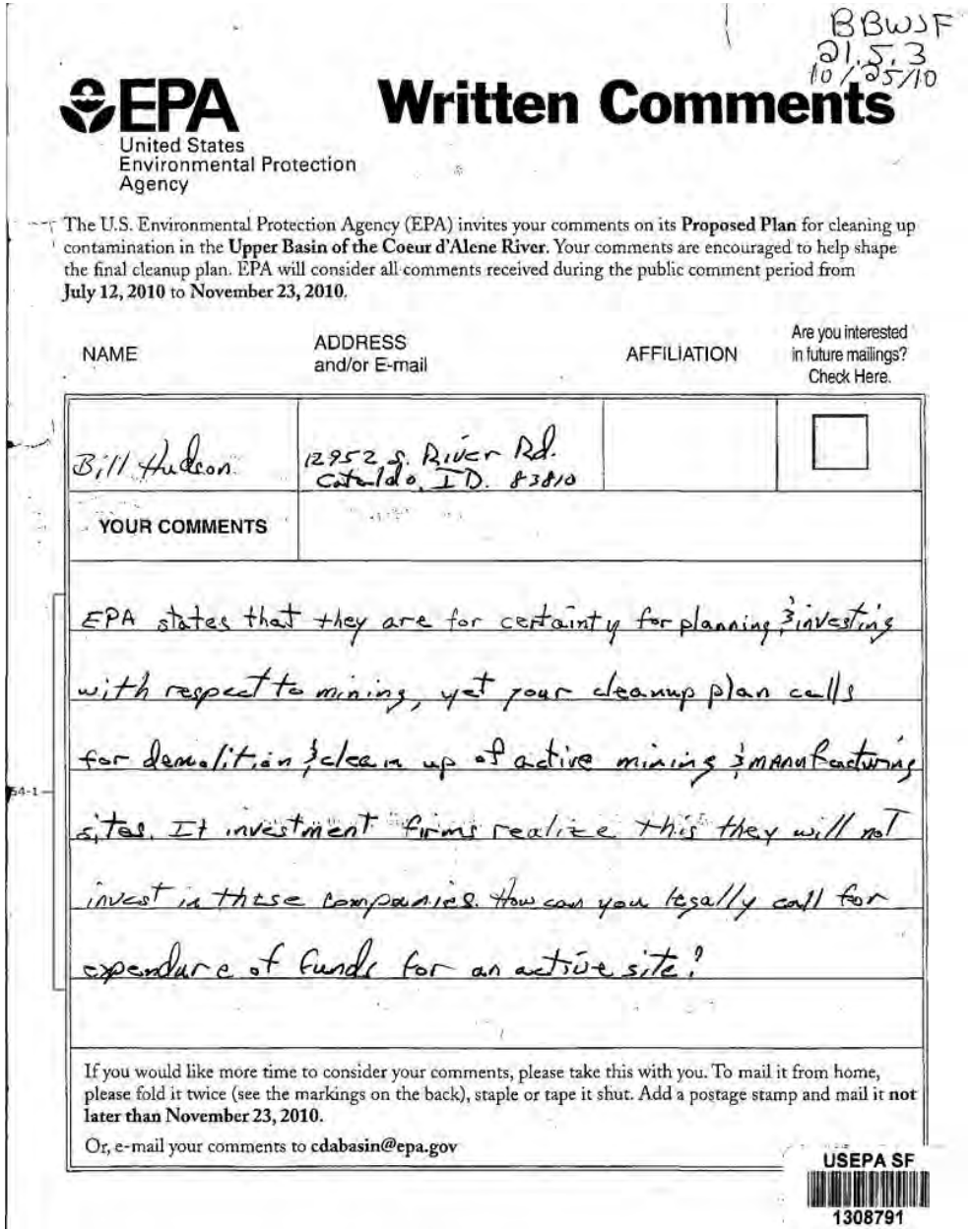
Response to comment I196-5
See response to Comment No. I25-5.

Response to comment I196-6
See response to Comment No. I25-6.

Response to comment I196-7
See response to Comment No. I25-7.

Response to comment I196-8
See response to Comment No. I25-8.

Hudson, Bill, I454, Letter 1308791



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21.5.3
10/25/10

EPA United States Environmental Protection Agency

Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **November 23, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Bill Hudson	12952 S. River Rd. Cataldo, ID. 83810		☐

YOUR COMMENTS

EPA states that they are for certainty for planning & investing with respect to mining, yet your cleanup plan calls for demolition & clean up of active mining & manufacturing sites. If investment firms realize this they will not invest in these companies. How can you legally call for expendure of funds for an active site?

I454-1

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than November 23, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1308791

Response to comment I454-1

See response to Comment No. I58-5.

Hull, John, I385, Letter 616276

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
JOHNH@NWMINESUPPLY.COM to formsubmission 11/11/2010 02:34 PM
Sent by: Johnh@Nwminesupply.Com <JOHNH=NWMINESUPPLY.COM

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: JOHN HULL
Date: 02/28/1963
Brief Overview: PACKUP AND GO HOME
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments:
Coeur d'Alene Basin Resident: Yes
Email Address: JOHNH@NWMINESUPPLY.COM
Mailing Address: JOHN HULL, 4190 BEAVER CREEK RD|WALLACE|IDAHO|83873|US
Phone Number: (208) 682-3054

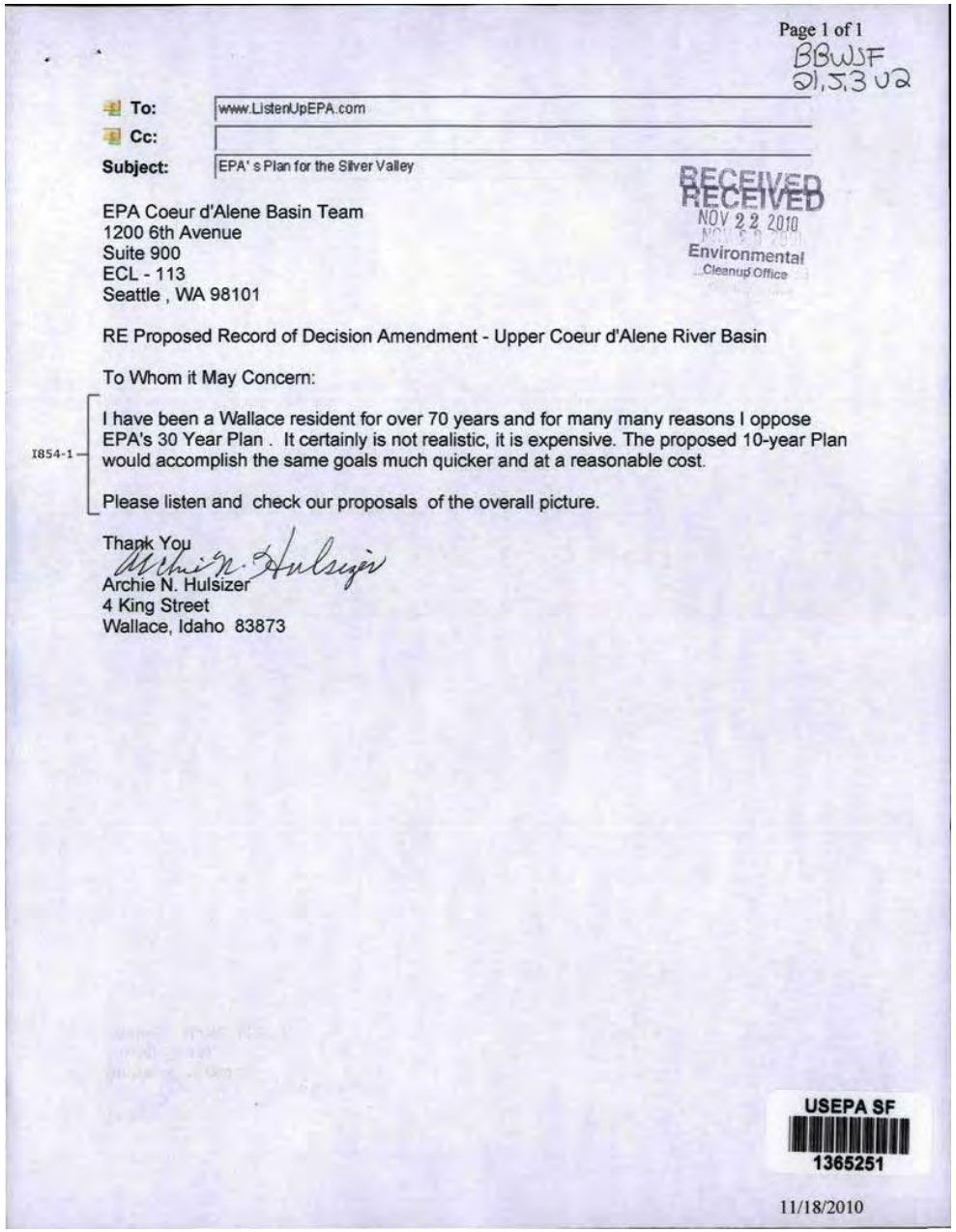
I385-1

616276

Response to comment I385-1

See response to Comment No. I351-1.

Hulsizer, Archie N., I854, Letter 1365251



Page 1 of 1

BBWJF
21,53 U2

To: www.ListenUpEPA.com

Cc:

Subject: EPA' s Plan for the Silver Valley

RECEIVED
RECEIVED
NOV 22 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL - 113
Seattle , WA 98101

RE Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom it May Concern:

I854-1 I have been a Wallace resident for over 70 years and for many many reasons I oppose EPA's 30 Year Plan . It certainly is not realistic, it is expensive. The proposed 10-year Plan would accomplish the same goals much quicker and at a reasonable cost.

Please listen and check our proposals of the overall picture.

Thank You
Archie N. Hulsizer

Archie N. Hulsizer
4 King Street
Wallace, Idaho 83873

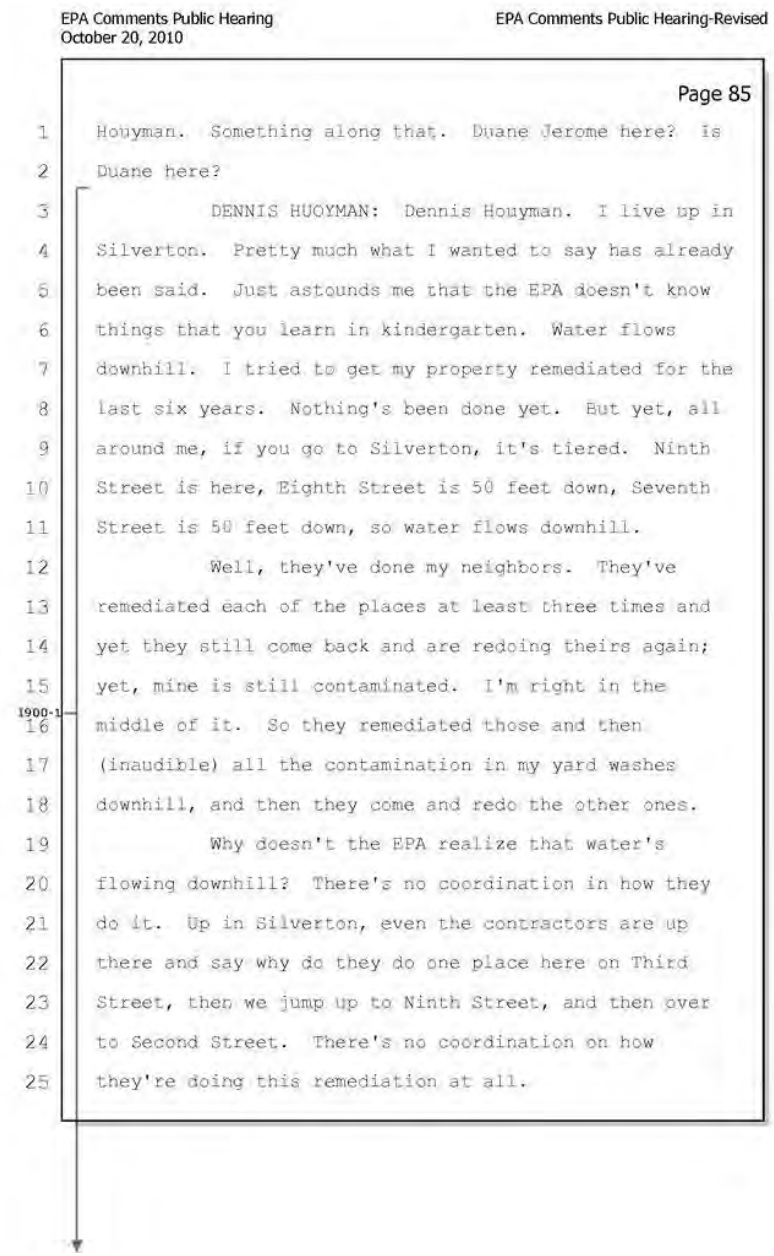
USEPA SF
1365251

11/18/2010

Response to comment I854-1

See response to Comment No. I474-2.

Huoyman, Dennis, I900, Letter 619651-35



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 85

Houyman. Something along that. Duane Jerome here? Is Duane here?

DENNIS HUOYMAN: Dennis Houyman. I live up in Silverton. Pretty much what I wanted to say has already been said. Just astounds me that the EPA doesn't know things that you learn in kindergarten. Water flows downhill. I tried to get my property remediated for the last six years. Nothing's been done yet. But yet, all around me, if you go to Silverton, it's tiered. Ninth Street is here, Eighth Street is 50 feet down, Seventh Street is 50 feet down, so water flows downhill.

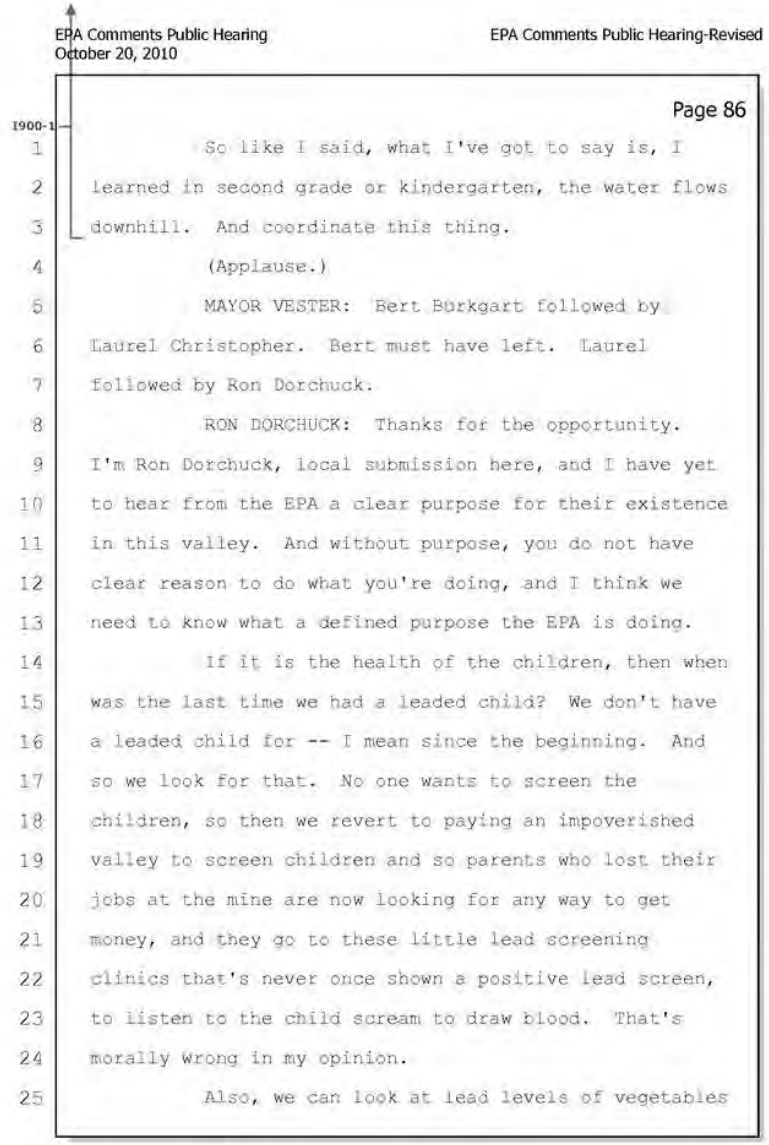
Well, they've done my neighbors. They've remediated each of the places at least three times and yet they still come back and are redoing theirs again; yet, mine is still contaminated. I'm right in the middle of it. So they remediated those and then (inaudible) all the contamination in my yard washes downhill, and then they come and redo the other ones.

Why doesn't the EPA realize that water's flowing downhill? There's no coordination in how they do it. Up in Silverton, even the contractors are up there and say why do they do one place here on Third Street, then we jump up to Ninth Street, and then over to Second Street. There's no coordination on how they're doing this remediation at all.

I900-1

Response to comment I900-1

Comment noted. See response to Comment No. I521-8.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 86

I900-1

So like I said, what I've got to say is, I learned in second grade or kindergarten, the water flows downhill. And coordinate this thing.

(Applause.)

MAYOR VESTER: Bert Burkgart followed by Laurel Christopher. Bert must have left. Laurel followed by Ron Dorchuck.

RON DORCHUCK: Thanks for the opportunity. I'm Ron Dorchuck, local submission here, and I have yet to hear from the EPA a clear purpose for their existence in this valley. And without purpose, you do not have clear reason to do what you're doing, and I think we need to know what a defined purpose the EPA is doing.

If it is the health of the children, then when was the last time we had a leaded child? We don't have a leaded child for -- I mean since the beginning. And so we look for that. No one wants to screen the children, so then we revert to paying an impoverished valley to screen children and so parents who lost their jobs at the mine are now looking for any way to get money, and they go to these little lead screening clinics that's never once shown a positive lead screen, to listen to the child scream to draw blood. That's morally wrong in my opinion.

Also, we can look at lead levels of vegetables

No comments

Husman, James, I653, Letter 618263

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jhusman@doerun.com to: formsubmission 11/18/2010 07:00 AM
Sent by: Jhusman@Doerun.Com <jhusman=doerun.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: James Husman
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. The EPA's Silver Valley proposed clean-up plan is unrealistic and unnecessary! The plan seems to me to be designed to build up the power structure of the EPA and not assist the Silver Valley. This appears to be a desperate grap by the EPA to ensure themselves jobs for 90 years at taxpayer expense. I don't want my taxes wasted in this manner!
Coeur d'Alene Basin Resident: No
Email Address: jhusman@doerun.com
Mailing Address: 48 Spruce St.|Viburnum|MO|65566|US
Phone Number: (573) 626-2005

1653-1

1653-2

618263

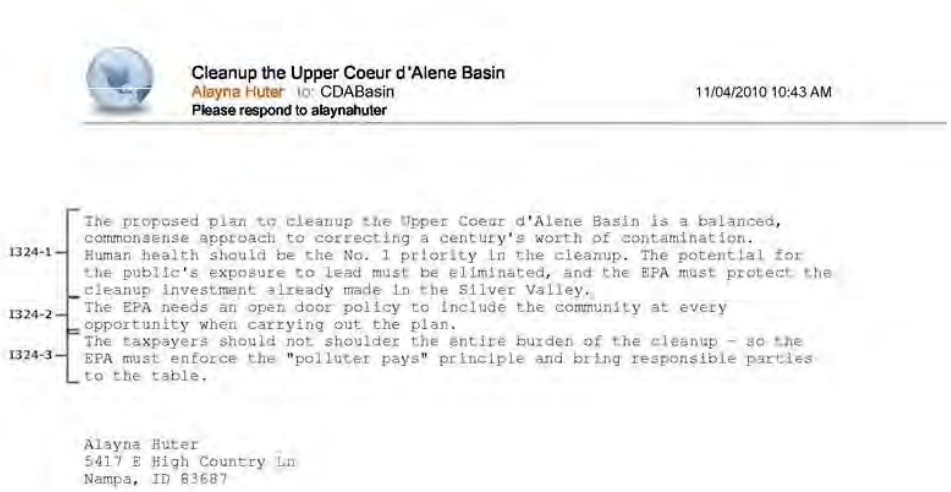
Response to comment I653-1

See response to Comment No. I351-1.

Response to comment I653-2

See responses to Comment Nos. I295-3 and LJ39-5.

Huter, Alayna, I324, Letter 614454



Cleanup the Upper Coeur d'Alene Basin
Alayna Huter to: CDABasin 11/04/2010 10:43 AM
Please respond to alaynahuter

I324-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I324-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I324-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Alayna Huter
5417 E High Country Ln
Nampa, ID 83687

614454

Response to comment I324-1

See response to Comment No. I295-1.

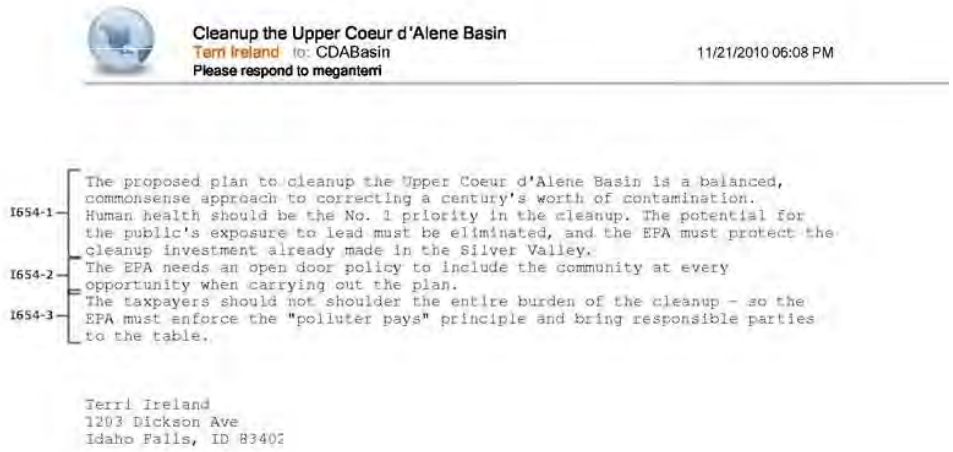
Response to comment I324-2

See response to Comment No. I295-2.

Response to comment I324-3

See response to Comment No. I295-3.

Ireland, Terri, I654, Letter 618264



Cleanup the Upper Coeur d'Alene Basin
Terri Ireland to: CDABasin 11/21/2010 06:08 PM
Please respond to meganterri

I654-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I654-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I654-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Terri Ireland
1203 Dickson Ave
Idaho Falls, ID 83402

618264

Response to comment I654-1

See response to Comment No. I295-1.

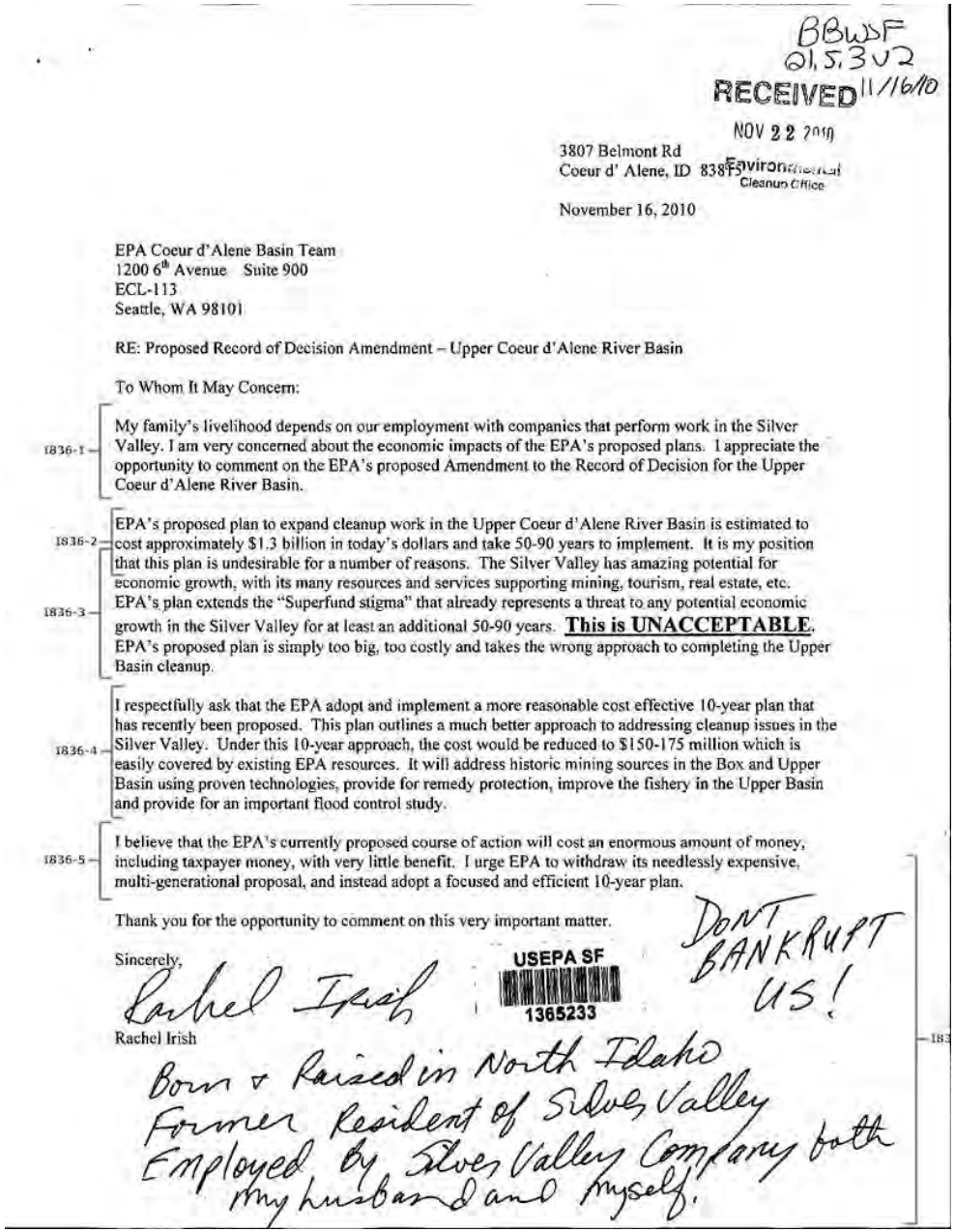
Response to comment I654-2

See response to Comment No. I295-2.

Response to comment I654-3

See response to Comment No. I295-3.

Irish, Rachel, I836, Letter 1365233



BBWSF
21.5.3v2
RECEIVED 11/16/10
NOV 22 2010
Environmental Cleanup Office

3807 Belmont Rd
Coeur d' Alene, ID 83815

November 16, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I836-1 My family's livelihood depends on our employment with companies that perform work in the Silver Valley. I am very concerned about the economic impacts of the EPA's proposed plans. I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I836-2 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc.

I836-3 EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. **This is UNACCEPTABLE.** EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I836-4 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I836-5 I believe that the EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Rachel Irish

USEPA SF
1365233

DON'T BANKRUPT US!

Rachel Irish

Born & Raised in North Idaho
Former Resident of Silver Valley
Employed by Silver Valley Company both my husband and myself.

I83

Response to comment I836-1
See responses to Comment Nos. I54-2 and I58-5.

Response to comment I836-2
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I836-3
See responses to Comment Nos. I474-1 and I58-5.

Response to comment I836-4
See response to Comment No. I474-2.

Response to comment I836-5
See response to Comment No. I474-2.

Response to comment I836-6
See responses to Comment Nos. I58-1, I58-2, and I474-2.

J, Vincent, I485, Letter 1308940

BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I485-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I485-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I485-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Vincent Je

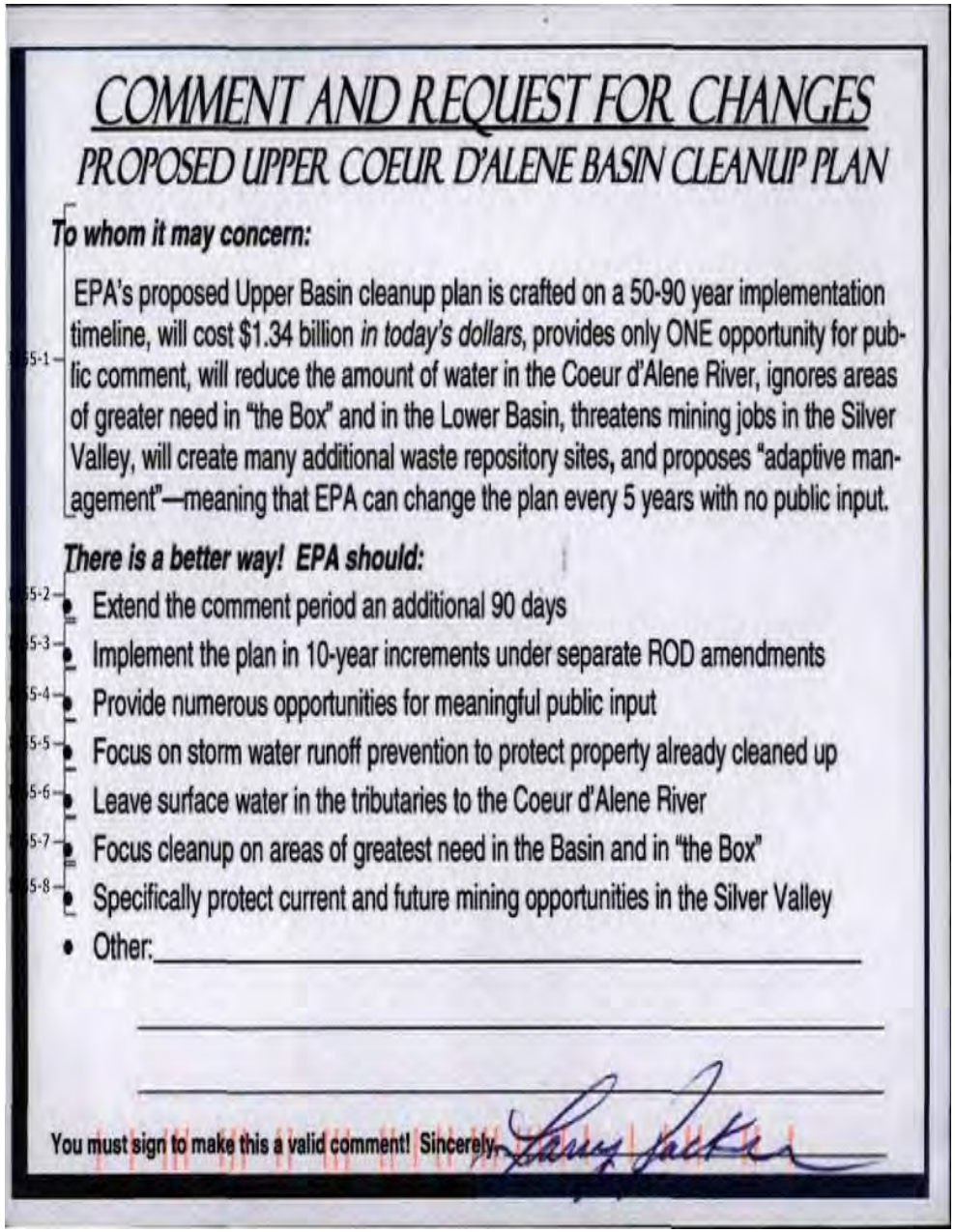
USEPA SF
1308940

Response to comment I485-1
See response to Comment No. I474-1.

Response to comment I485-2
See response to Comment No. I474-2.

Response to comment I485-3
See response to Comment No. I474-3.

Jackson, Larry, I155, Letter 1357291



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I155-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I155-2 Extend the comment period an additional 90 days
- I155-3 Implement the plan in 10-year increments under separate ROD amendments
- I155-4 Provide numerous opportunities for meaningful public input
- I155-5 Focus on storm water runoff prevention to protect property already cleaned up
- I155-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I155-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I155-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely, Larry Jackson

Response to comment I155-1
See response to Comment No. I25-1.

Response to comment I155-2
See response to Comment No. I25-2.

Response to comment I155-3
See response to Comment No. I25-3.

Response to comment I155-4
See response to Comment No. I25-4.

Response to comment I155-5
See response to Comment No. I25-5.

Response to comment I155-6
See response to Comment No. I25-6.

Response to comment I155-7
See response to Comment No. I25-7.

Response to comment I155-8
See response to Comment No. I25-8.

James, Jared, I115, Letter 1357162

BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I115-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I115-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I115-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I115-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I115-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Jared Jame

USEPA SF
1357162

Response to comment I115-1
See response to Comment No. I58-1.

Response to comment I115-2
See response to Comment No. I58-2.

Response to comment I115-3
See response to Comment No. I58-3.

Response to comment I115-4
See response to Comment No. I58-4.

Response to comment I115-5
See response to Comment No. I58-5.

Jameson, Dee, I655, Letter 618265

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
dee.jameson@frontier.com to: formsubmission 11/18/2010 11:00 AM
Sent by: Dee.Jameson@Frontier.Com <dee.jameson=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: DEE JAMESON
Date: 11/18/2010
Brief Overview: EPA's proposed plan IS FLAWED and is not supported by BEST SCIENCE AVAILABLE. EPA is ignoring the fact that it 50 to 90 year plan will be more distructive to the natural habitat and reverse the natural environmental ability to correct itself. Not to speak of the fact that EPA intends to disrupt living streams and rivers to be be channneled into what can only be termed as sewer pipes. EPA calls this necessary? I call this a man made catastrophy. EPA's hipocracy astounds me and my fellow Idahoans. You have so little to show for what you have done to date. EPA still holds back funds that were deignated for cleanup in the Valley.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. EPA has witheld funds designated for cleanup in the Valley. It continues to ignore the best science. EPA's plan will be a man made disaster to the environment, local economy and stimatize the Coeur'Alene Basin.
Coeur d'Alene Basin Resident: Yes
Email Address: dee.jameson@frontier.com
Mailing Address: Dee Jameson, 9120 N Fieldstone Dr|Hayden|Idaho|83835|US
Phone Number: (208) 659-1675

I655-1

I655-2

618265

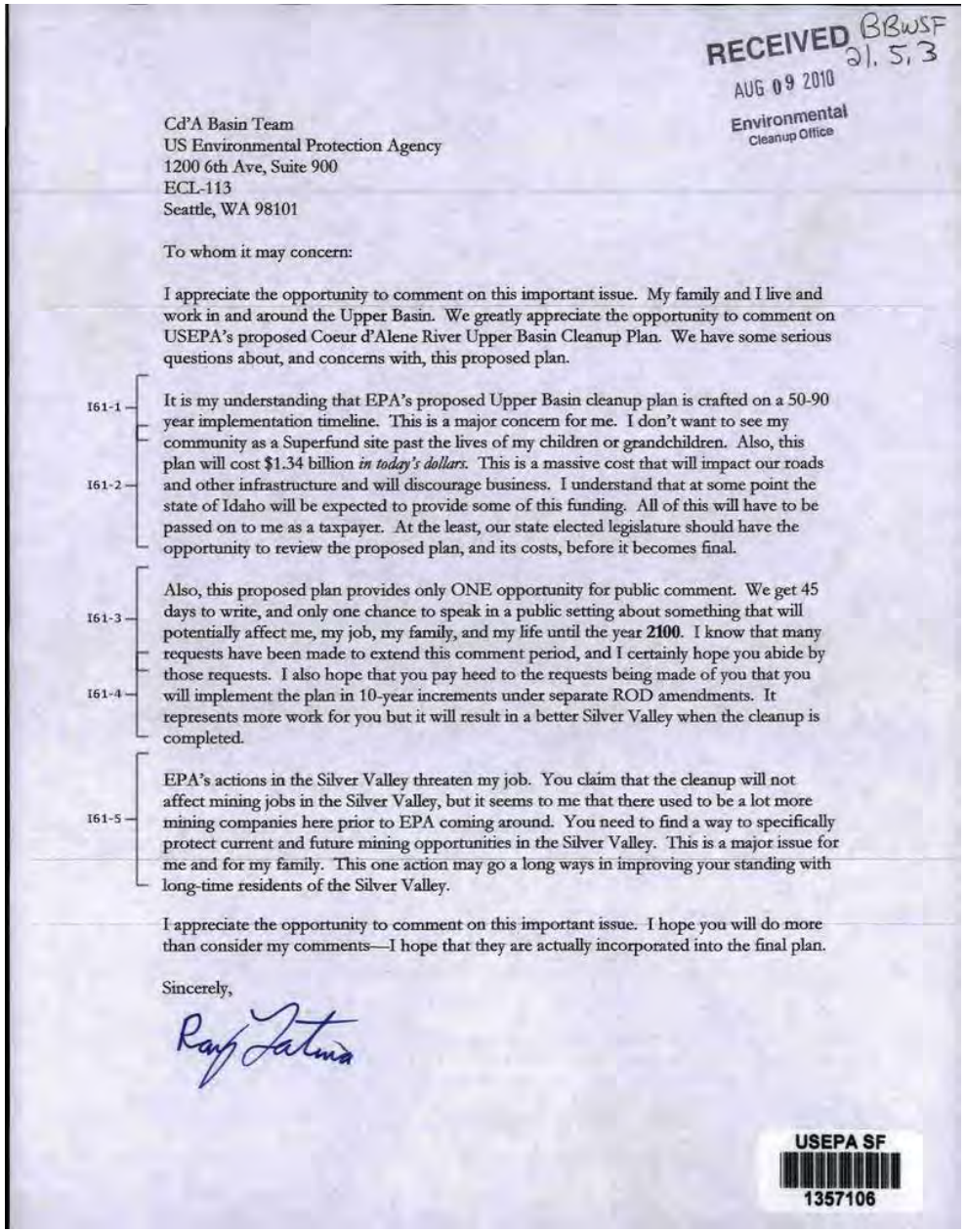
Response to comment I655-1

See response to Comment No. I351-1.

Response to comment I655-2

See responses to Comment Nos. I295-3, LJ39-5 and I54-2.

Jatma, Ray, I61, Letter 1357106



RECEIVED BBWSF 21, 5, 3
AUG 09 2010
Environmental Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I61-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I61-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I61-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I61-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I61-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Ray Jatma

USEPA SF
1357106

Response to comment I61-1
See response to Comment No. I58-1.

Response to comment I61-2
See response to Comment No. I58-2.

Response to comment I61-3
See response to Comment No. I58-3.

Response to comment I61-4
See response to Comment No. I58-4.

Response to comment I61-5
See response to Comment No. I58-5.

Jeffries, Tom, I656, Letter 618266

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
tntjeffries@verizon.net to: formsubmission 11/19/2010 12:43 PM
Sent by: Tntjeffries@Verizon.Net <tntjeffries=verizon.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Tom Jeffries
Date: 09/05/1970
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I656-1 My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. I make a good living for my family in the Mining Industry with great benefits and the ability to retire. The EPA has no right to come to the Silver Valley and potentially take my job along with SEVERAL others. I656-2
Coeur d'Alene Basin Resident: Yes
Email Address: tntjeffries@verizon.net
Mailing Address: PO BOX 913|Pinehurst|ID|83850|US
Phone Number: (208) 699-6695

618266

Response to comment I656-1

See response to Comment No. I351-1.

Response to comment I656-2

See responses to Comment Nos. I54-2 and I58-5.

Jeffries, Tracy, I657, Letter 618267

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
tracyjeffries@frontier.com to: formsubmission 11/19/2010 12:39 PM
Sent by: Tracyjeffries@Frontier.Com <tracyjeffries=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Tracy Jeffries
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I657-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: tracyjeffries@frontier.com
Mailing Address: PO BOX 913|Pinehurst|ID|83850|US
Phone Number: (208) 682-3406

618267

Response to comment I657-1

See response to Comment No. I351-1.

Jimmerson, Trish, I658, Letter 618268

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jalapeno_heaven@hotmail.com to: formsubmission 11/19/2010 08:27 AM
Sent by: Jalapeno_heaven@Hotmail.Com <jalapeno_heaven=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Trish Jimmerson
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I don't understand why you won't listen to the people of the Silver Valley. There isn't a person in the Valley that supports your plan including the Idaho government. You are causing concern and stress on the people of Idaho and you won't even consider their pleas. Don't do this. There is a better way for the people (I am referring to the 10-year proposed plan) and according to your EPA Commission Statement, you are suppose to protect the health and welfare of the citizens so listen to them, otherwise you will cause mining to suffer therefore hurting the livelihood of the Silver Valley.

I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: jalapeno_heaven@hotmail.com
Mailing Address: 33669 N. Roberts Rd.|Athol|Idaho|83801|US
Phone Number:

I658-1
I658-2

618268

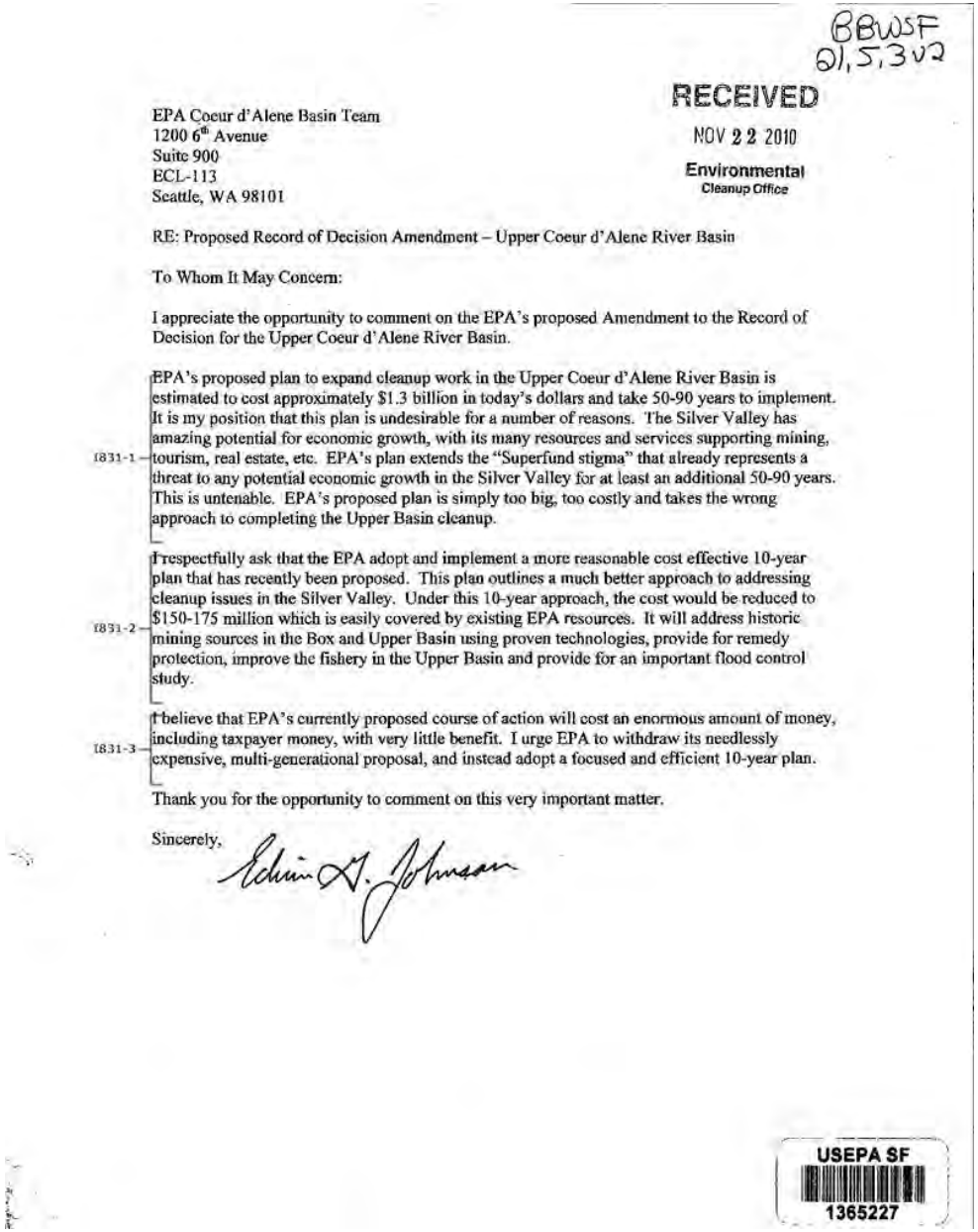
Response to comment I658-1

See response to Comment No. I351-1.

Response to comment I658-2

See response to Comment No. I658-1 above.

Johnson, E. G., I831, Letter 1365227



BBWSF
01,5,3v2

RECEIVED
NOV 22 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I831-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I831-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I831-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Edwin G. Johnson

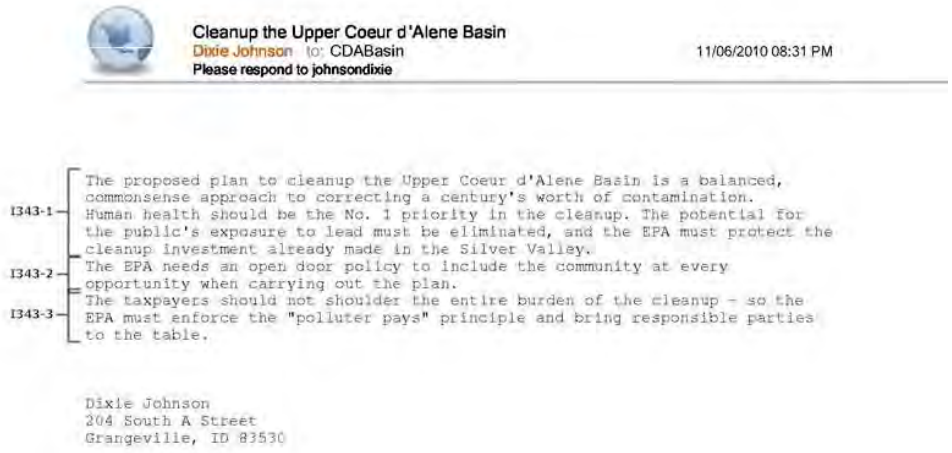
USEPA SF
1365227

Response to comment I831-1
See response to Comment No. I474-1.

Response to comment I831-2
See response to Comment No. I474-2.

Response to comment I831-3
See response to Comment No. I474-3.

Johnson, Dixie, I343, Letter 614473



Cleanup the Upper Coeur d'Alene Basin
Dixie Johnson to: CDABasin 11/06/2010 08:31 PM
Please respond to johnsondixie

I343-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I343-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I343-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Dixie Johnson
204 South A Street
Grangeville, ID 83530

614473

Response to comment I343-1

See response to Comment No. I295-1.

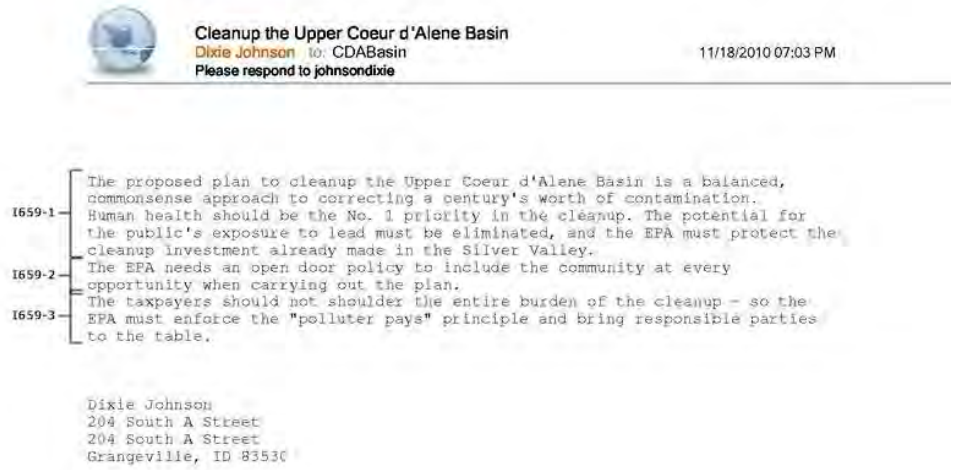
Response to comment I343-2

See response to Comment No. I295-2.

Response to comment I343-3

See response to Comment No. I295-3.

Johnson, Dixie, I659, Letter 618269



Cleanup the Upper Coeur d'Alene Basin
Dixie Johnson to: CDABasin 11/18/2010 07:03 PM
Please respond to johnsondixie

I659-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I659-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I659-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Dixie Johnson
204 South A Street
204 South A Street
Grangeville, ID 83530

618269

Response to comment I659-1

See response to Comment No. I295-1.

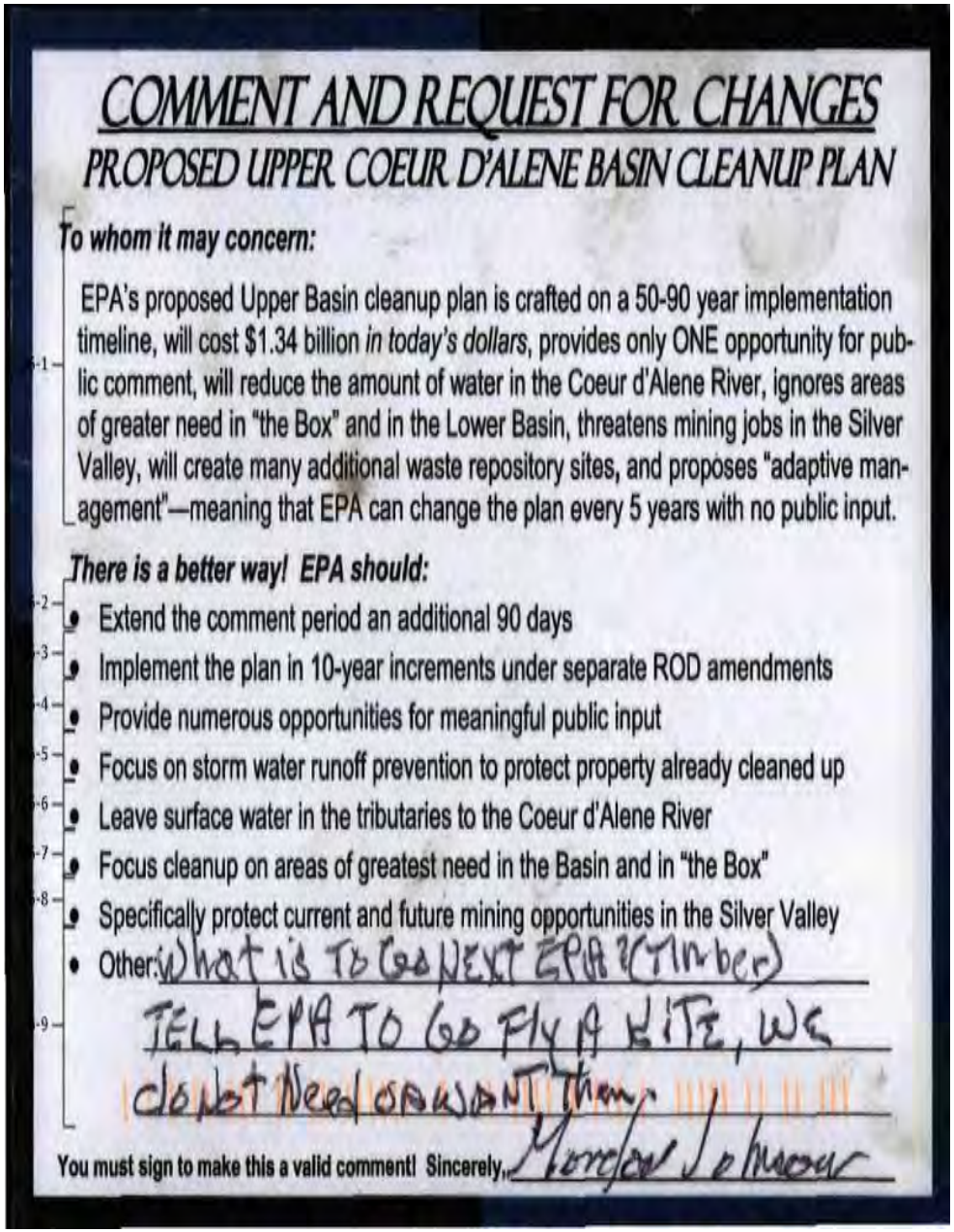
Response to comment I659-2

See response to Comment No. I295-2.

Response to comment I659-3

See response to Comment No. I295-3.

Johnson, Gordon, I26, Letter 1357070



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I26-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I26-2 Extend the comment period an additional 90 days
- I26-3 Implement the plan in 10-year increments under separate ROD amendments
- I26-4 Provide numerous opportunities for meaningful public input
- I26-5 Focus on storm water runoff prevention to protect property already cleaned up
- I26-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I26-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I26-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: What is To Go NEXT EPA ? (Timber)

I26-9 TELL EPA TO Go Fly A KITE, WE don't Need or WANT Them.

You must sign to make this a valid comment! Sincerely, Gordon Johnson

Response to comment I26-1
See response to Comment No. I25-1.

Response to comment I26-2
See response to Comment No. I25-2.

Response to comment I26-3
See response to Comment No. I25-3.

Response to comment I26-4
See response to Comment No. I25-4.

Response to comment I26-5
See response to Comment No. I25-5.

Response to comment I26-6
See response to Comment No. I25-6.

Response to comment I26-7
See response to Comment No. I25-7.

Response to comment I26-8
See response to Comment No. I25-8.

Response to comment I26-9
Comment noted.

Johnson, Roger, I660, Letter 618270

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
rogerjohnson_198@msn.com to: formsubmission 11/17/2010 01:26 PM
Sent by: Rogerjohnson_198@Msn.Com <rogerjohnson_198=msn.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Roger Johnson
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I660-1 My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: rogerjohnson_198@msn.com
Mailing Address:
Phone Number:

618270

Response to comment I660-1

See response to Comment No. I351-1.

Johnston, Bob, I386, Letter 616277

FW: EPA Plan
Citizens for Prosperous Silver Valley
to:
CDABasin
11/12/2010 05:33 PM
Cc:
BobCindiB
Show Details

From: BobCindiB@aol.com [mailto:BobCindiB@aol.com]
Sent: Friday, November 12, 2010 5:52 AM
To: info@ListenUpEPA.com
Subject: EPA Plan

Dear Sirs,

I386-1 **I live here and the EPA must listen to the people who live here. We urge the EPA to adopt and implement a sensible approach, a 10-Year Plan that has been proposed by members of the community. This 10-Year Plan could be implemented for $150-175 million, which is a price EPA can afford, and will improve water quality and the fishery in the Silver Valley more quickly and efficiently.**

I386-2 **Citizens for a Prosperous Silver Valley believes that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer dollars, with very little benefit. We urge EPA to withdraw its needlessly expensive and multi-generational proposal, and instead adopt a focused and efficient 10-Year Plan.** I386-3

The EPA plan is too big, too costly, and unnecessary!

EPA we don't need this plan it's too big and costly !

Call me if you want to discuss my opinion.

Bob Johnston
101 W.Prairie Ctr. Suite 204
Hayden, Idaho 83835
208-651-2251
bobcindib@aol.com

616277

Response to comment I386-1

See response to Comment No. I474-2.

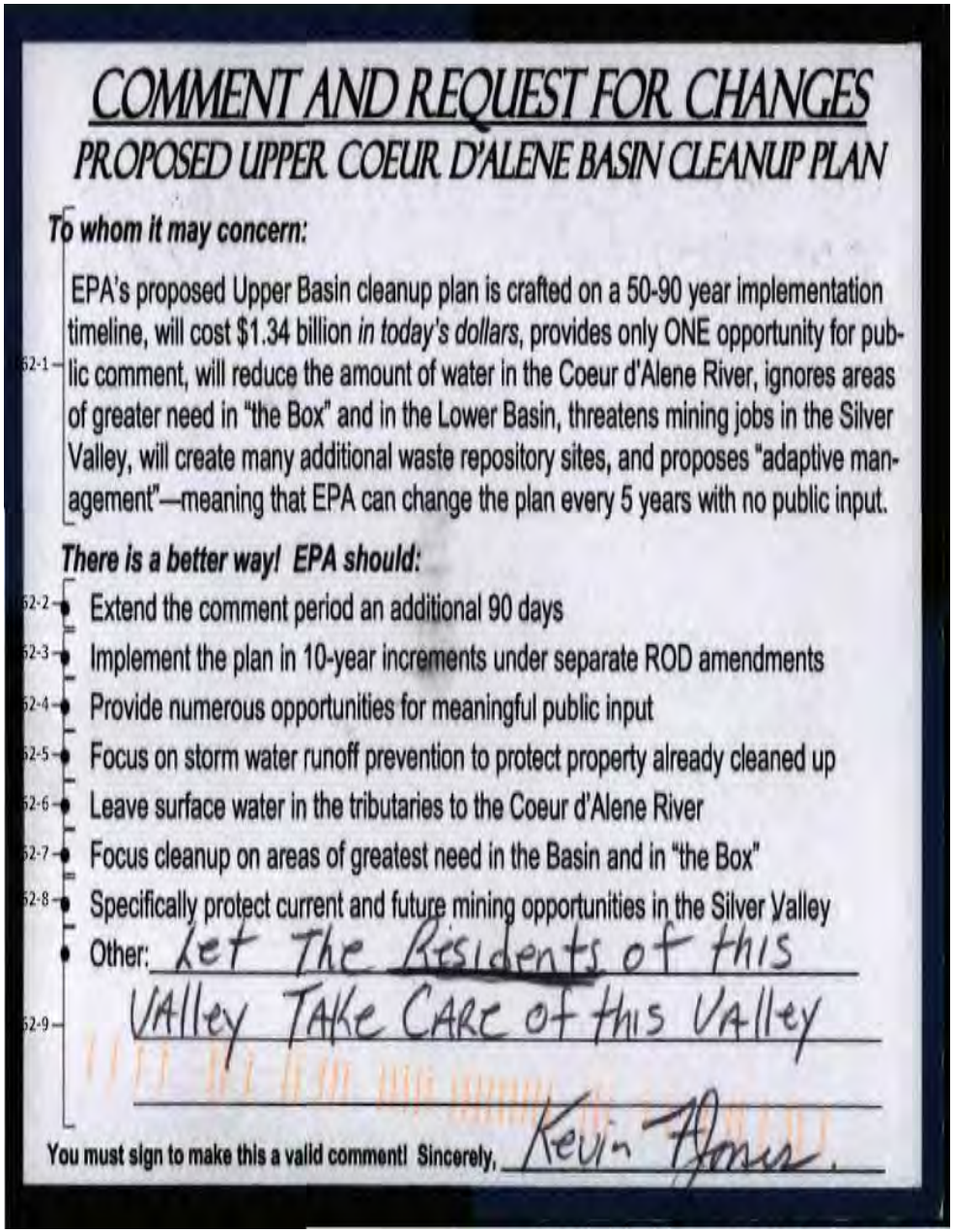
Response to comment I386-2

See response to Comment No. I58-2.

Response to comment I386-3

See response to Comment No. I474-2.

Jones, Kevin, I162, Letter 1357298



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I162-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I162-2 Extend the comment period an additional 90 days
- I162-3 Implement the plan in 10-year increments under separate ROD amendments
- I162-4 Provide numerous opportunities for meaningful public input
- I162-5 Focus on storm water runoff prevention to protect property already cleaned up
- I162-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I162-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I162-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: Let The Residents of this Valley Take Care of this Valley

I162-9

You must sign to make this a valid comment! Sincerely, Kevin Jones.

Response to comment I162-1
See response to Comment No. I25-1.

Response to comment I162-2
See response to Comment No. I25-2.

Response to comment I162-3
See response to Comment No. I25-3.

Response to comment I162-4
See response to Comment No. I25-4.

Response to comment I162-5
See response to Comment No. I25-5.

Response to comment I162-6
See response to Comment No. I25-6.

Response to comment I162-7
See response to Comment No. I25-7.

Response to comment I162-8
See response to Comment No. I25-8.

Response to comment I162-9
See response to Comment No. I295-1.

Jordan, John, I886, Letter 619651-16

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October 20, 2010

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Now, to be fair to EPA, I would say, yes, there is work to be done, but be honest. No more propaganda. Let commonsense guide your plan. Ninety years is certainly not commonsense. $1.34 billion is certainly not commonsense. Run it like a business. Prioritize the requirements, plan ten-year increments and take advantage of what you have already learned in preparation for any additional work beyond ten years if it is truly required.

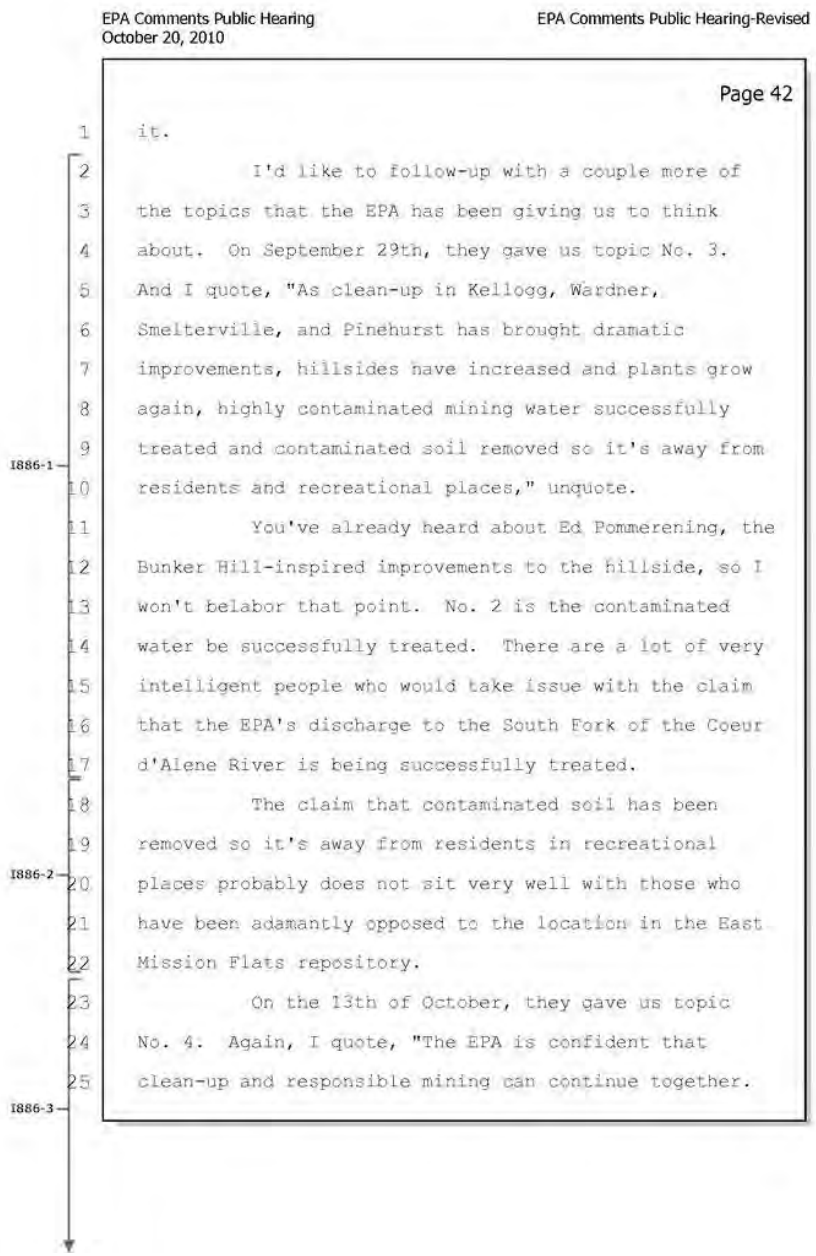
In closing, I want to express my appreciation to the mayors of the Silver Valley for their work and dedication of time in making this town hall meeting possible. We have been offered relatively little time to prepare for a plan that is expected to last for 90 years and meetings like this one provide more opportunities for our voice to be heard and for that I want to thank you.

(Applause.)

MAYOR VESTER: John Jordan followed by Mike Clary.

JOHN JORDAN: Thank you, Mayors. I appreciate the opportunity to speak. My name is John Jordan. I'm a graduate of Wallace High School. I'm a long-term resident of the Silver Valley. I'm a mining professional who lives in this location because I love

No comments



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

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it.

I'd like to follow-up with a couple more of the topics that the EPA has been giving us to think about. On September 29th, they gave us topic No. 3. And I quote, "As clean-up in Kellogg, Wardner, Smelterville, and Pinehurst has brought dramatic improvements, hillsides have increased and plants grow again, highly contaminated mining water successfully treated and contaminated soil removed so it's away from residents and recreational places," unquote. I886-1

You've already heard about Ed Pommerening, the Bunker Hill-inspired improvements to the hillside, so I won't belabor that point. No. 2 is the contaminated water be successfully treated. There are a lot of very intelligent people who would take issue with the claim that the EPA's discharge to the South Fork of the Coeur d'Alene River is being successfully treated.

The claim that contaminated soil has been removed so it's away from residents in recreational places probably does not sit very well with those who have been adamantly opposed to the location in the East Mission Flats repository. I886-2

On the 13th of October, they gave us topic No. 4. Again, I quote, "The EPA is confident that clean-up and responsible mining can continue together. I886-3

Response to comment I886-1

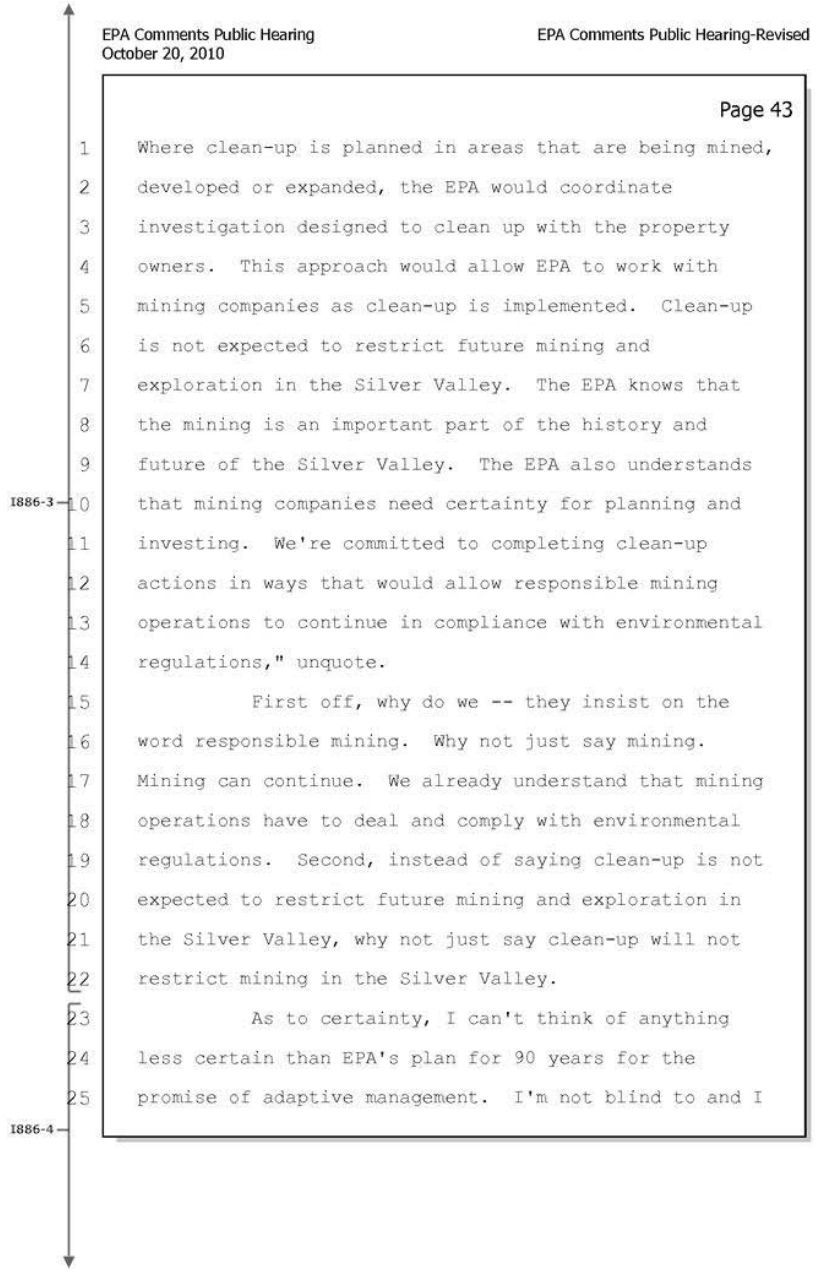
See response to Comment No. LC37-9.

Response to comment I886-2

See response to Comment No. LC21-9.

Response to comment I886-3

See response to Comment No. I58-5.



EPA Comments Public Hearing
October 20, 2010

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Where clean-up is planned in areas that are being mined, developed or expanded, the EPA would coordinate investigation designed to clean up with the property owners. This approach would allow EPA to work with mining companies as clean-up is implemented. Clean-up is not expected to restrict future mining and exploration in the Silver Valley. The EPA knows that the mining is an important part of the history and future of the Silver Valley. The EPA also understands that mining companies need certainty for planning and investing. We're committed to completing clean-up actions in ways that would allow responsible mining operations to continue in compliance with environmental regulations," unquote.

I886-3

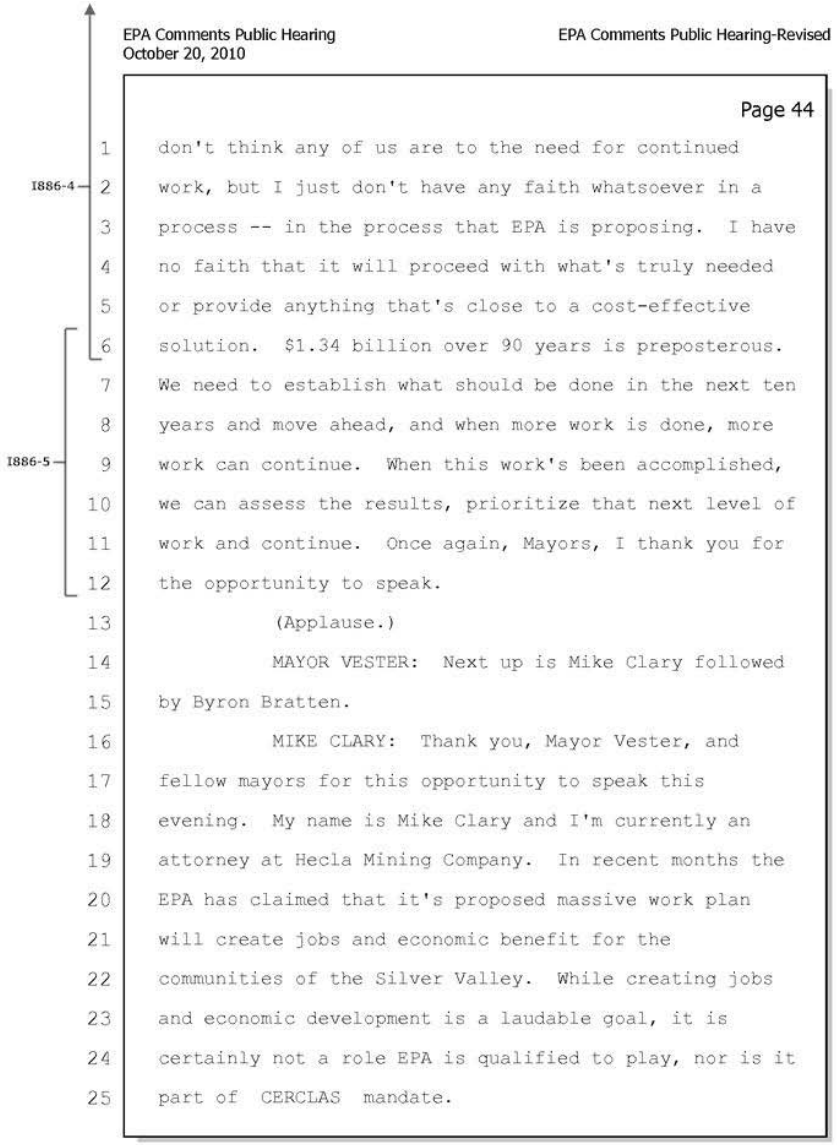
First off, why do we -- they insist on the word responsible mining. Why not just say mining. Mining can continue. We already understand that mining operations have to deal and comply with environmental regulations. Second, instead of saying clean-up is not expected to restrict future mining and exploration in the Silver Valley, why not just say clean-up will not restrict mining in the Silver Valley.

As to certainty, I can't think of anything less certain than EPA's plan for 90 years for the promise of adaptive management. I'm not blind to and I

I886-4

Response to comment I886-4

See responses to Comment Nos. I58-1, I58-4 and LJ11-2.



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October 20, 2010

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Page 44

I886-4 — don't think any of us are to the need for continued work, but I just don't have any faith whatsoever in a process -- in the process that EPA is proposing. I have no faith that it will proceed with what's truly needed or provide anything that's close to a cost-effective solution. $1.34 billion over 90 years is preposterous. We need to establish what should be done in the next ten years and move ahead, and when more work is done, more work can continue. When this work's been accomplished, we can assess the results, prioritize that next level of work and continue. Once again, Mayors, I thank you for the opportunity to speak.

(Applause.)

MAYOR VESTER: Next up is Mike Clary followed by Byron Bratten.

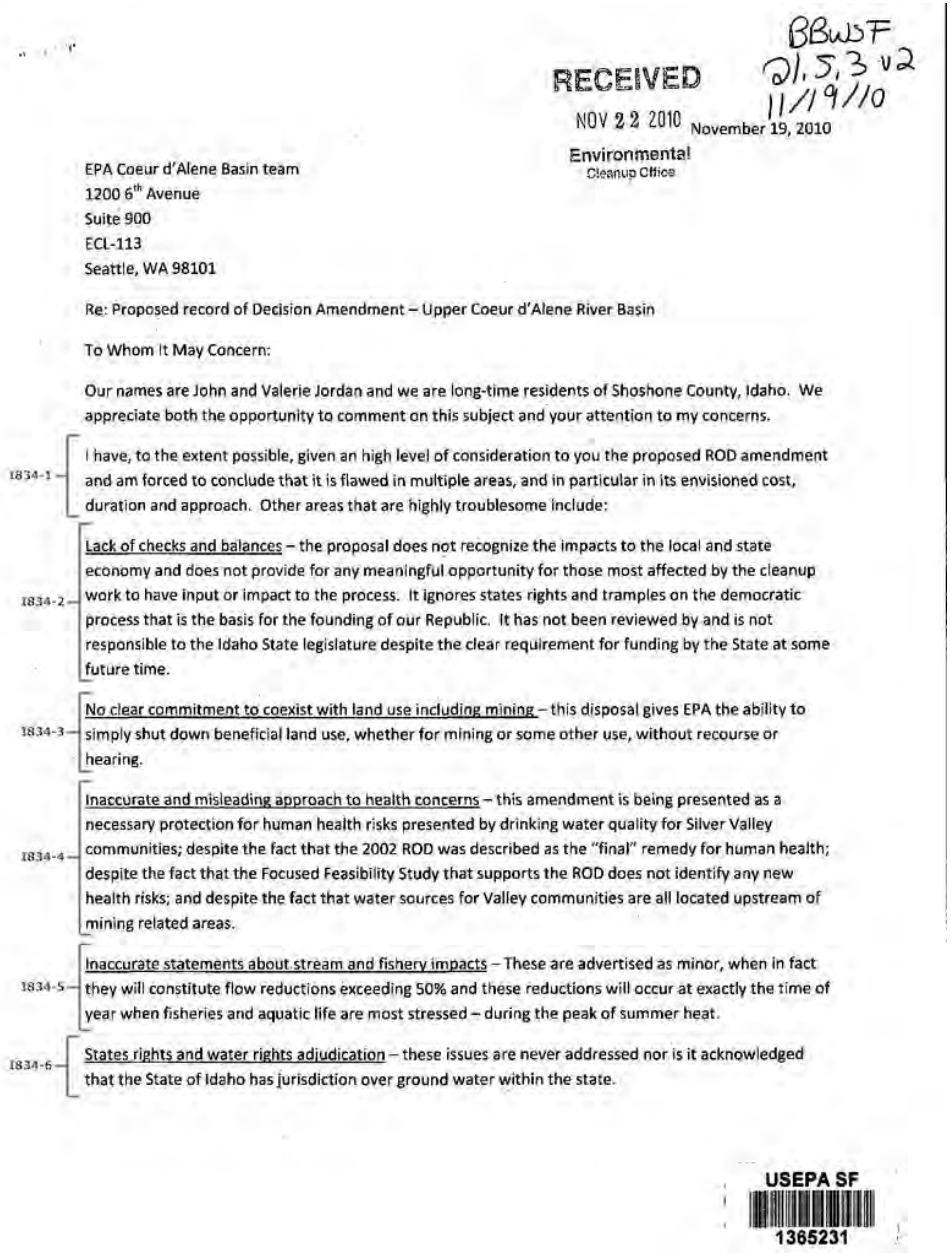
MIKE CLARY: Thank you, Mayor Vester, and fellow mayors for this opportunity to speak this evening. My name is Mike Clary and I'm currently an attorney at Hecla Mining Company. In recent months the EPA has claimed that it's proposed massive work plan will create jobs and economic benefit for the communities of the Silver Valley. While creating jobs and economic development is a laudable goal, it is certainly not a role EPA is qualified to play, nor is it part of CERCLAS mandate.

I886-5

Response to comment I886-5

See responses to Comment Nos. I58-1 and I58-4.

Jordan, John, Jordan, Valerie, I834, Letter 1365231



BBWSF
21.5.3 v2
11/19/10

RECEIVED
NOV 22 2010
Environmental
Cleanup Office

November 19, 2010

EPA Coeur d'Alene Basin team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

Re: Proposed record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

Our names are John and Valerie Jordan and we are long-time residents of Shoshone County, Idaho. We appreciate both the opportunity to comment on this subject and your attention to my concerns.

I834-1 I have, to the extent possible, given an high level of consideration to you the proposed ROD amendment and am forced to conclude that it is flawed in multiple areas, and in particular in its envisioned cost, duration and approach. Other areas that are highly troublesome include:

I834-2 Lack of checks and balances – the proposal does not recognize the impacts to the local and state economy and does not provide for any meaningful opportunity for those most affected by the cleanup work to have input or impact to the process. It ignores states rights and tramples on the democratic process that is the basis for the founding of our Republic. It has not been reviewed by and is not responsible to the Idaho State legislature despite the clear requirement for funding by the State at some future time.

I834-3 No clear commitment to coexist with land use including mining – this disposal gives EPA the ability to simply shut down beneficial land use, whether for mining or some other use, without recourse or hearing.

I834-4 Inaccurate and misleading approach to health concerns – this amendment is being presented as a necessary protection for human health risks presented by drinking water quality for Silver Valley communities; despite the fact that the 2002 ROD was described as the "final" remedy for human health; despite the fact that the Focused Feasibility Study that supports the ROD does not identify any new health risks; and despite the fact that water sources for Valley communities are all located upstream of mining related areas.

I834-5 Inaccurate statements about stream and fishery impacts – These are advertised as minor, when in fact they will constitute flow reductions exceeding 50% and these reductions will occur at exactly the time of year when fisheries and aquatic life are most stressed – during the peak of summer heat.

I834-6 States rights and water rights adjudication – these issues are never addressed nor is it acknowledged that the State of Idaho has jurisdiction over ground water within the state.

USEPA SF
1365231

Response to comment I834-1
See responses to Comment Nos. I58-1 and I58-2.

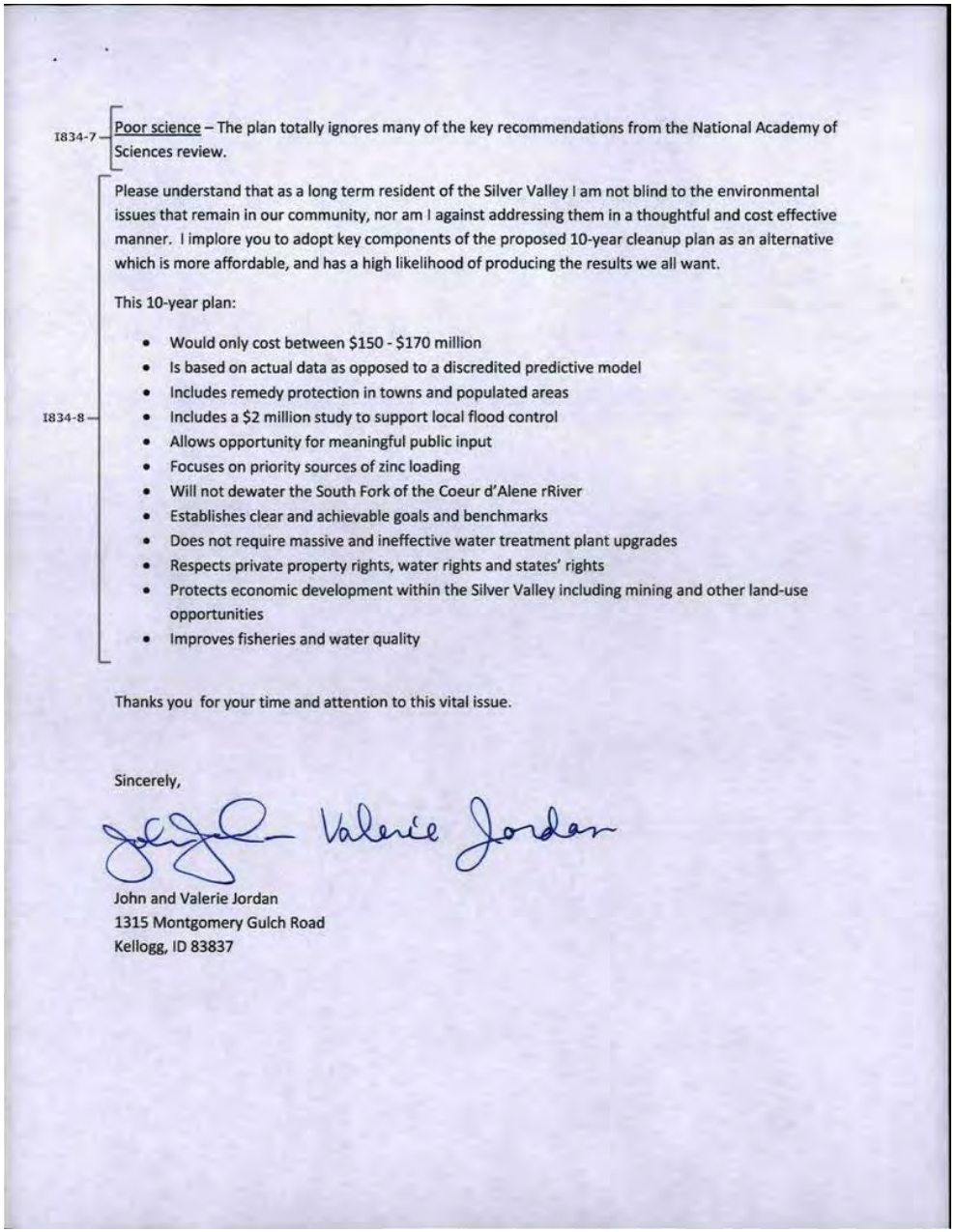
Response to comment I834-2
See responses to Comment Nos. I474-1, I295-2, and LJ39-5.

Response to comment I834-3
See responses to Comment Nos. I58-5 and I54-2.

Response to comment I834-4
See response to Comment No. I295-1 and the ROD Amendment, Part 3, Section 3.3.1.

Response to comment I834-5
See response to Comment No. I54-8.

Response to comment I834-6
See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.



I834-7 Poor science – The plan totally ignores many of the key recommendations from the National Academy of Sciences review.

Please understand that as a long term resident of the Silver Valley I am not blind to the environmental issues that remain in our community, nor am I against addressing them in a thoughtful and cost effective manner. I implore you to adopt key components of the proposed 10-year cleanup plan as an alternative which is more affordable, and has a high likelihood of producing the results we all want.

This 10-year plan:

I834-8
- Would only cost between $150 - $170 million
- Is based on actual data as opposed to a discredited predictive model
- Includes remedy protection in towns and populated areas
- Includes a $2 million study to support local flood control
- Allows opportunity for meaningful public input
- Focuses on priority sources of zinc loading
- Will not dewater the South Fork of the Coeur d'Alene rRiver
- Establishes clear and achievable goals and benchmarks
- Does not require massive and ineffective water treatment plant upgrades
- Respects private property rights, water rights and states' rights
- Protects economic development within the Silver Valley including mining and other land-use opportunities
- Improves fisheries and water quality

Thanks you for your time and attention to this vital issue.

Sincerely,

John and Valerie Jordan
1315 Montgomery Gulch Road
Kellogg, ID 83837

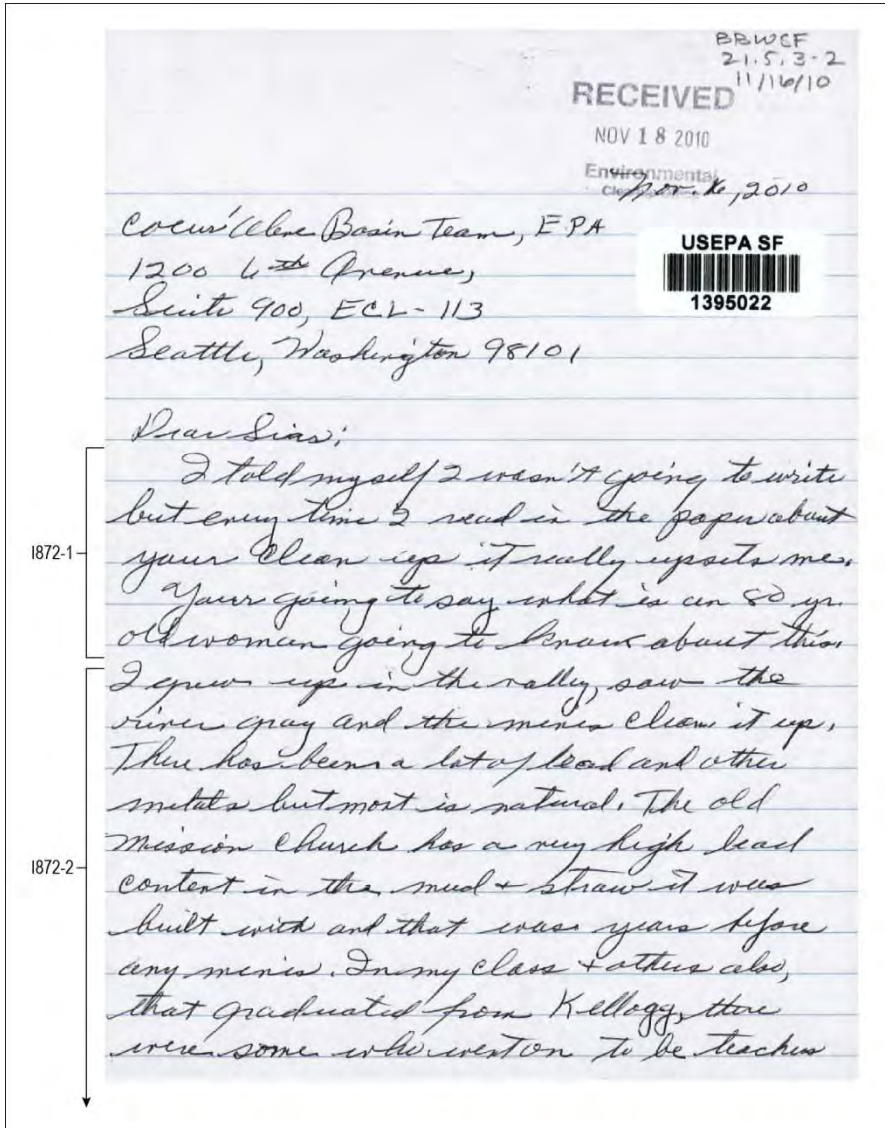
Response to comment I834-7

See response to Comment No. LJ27-8.

Response to comment I834-8

See response to Comment No. I474-2.

Joy, I872, Letter 1395022



BBWCF
21.5.3-2
11/16/10

RECEIVED
NOV 18 2010
Environmental

Nov. 16, 2010

Coeur d'Alene Basin Team, EPA
1200 6th Avenue,
Suite 900, ECL-113
Seattle, Washington 98101

USEPA SF
1395022

Dear Sirs;

I872-1 I told myself I wasn't going to write but every time I read in the paper about your clean up it really upsets me. You're going to say what is an 80 yr. old woman going to know about this.

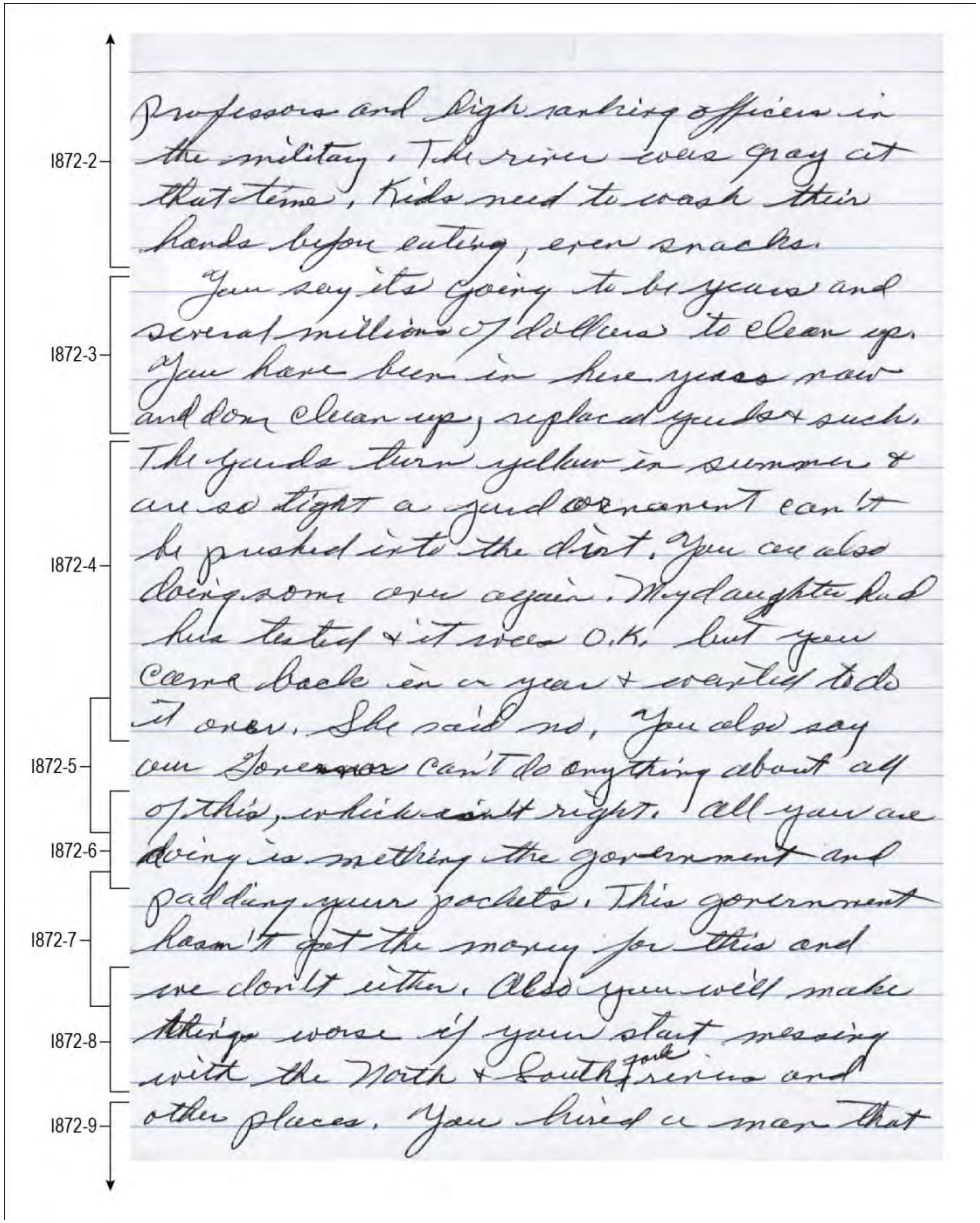
I872-2 I grew up in the valley, saw the river gray and the mines clean it up. There has been a lot of lead and other metals but most is natural. The old mission church has a very high lead content in the mud + straw it was built with and that was years before any mines. In my class + others also, that graduated from Kellogg, there were some who went on to be teachers

Response to comment I872-1

Thank you for your comment.

Response to comment I872-2

Comment noted.



Professors and High ranking officers in the military. The river bed's gray at that time, Kids need to wash their hands before eating, even snacks.

You say its going to be years and several millions of dollars to clean up. You have been in here years now and don clean up, replaced yards + such. The yards turn yellow in summer & are so tight a yard ornament can't be pushed into the dirt. You can also doing some over again. My daughter had hair tested + it was O.K. but you came back in a year + wanted kids it over. She said no, You also say our Governor can't do anything about all of this, which ain't right. All you are doing is nothing the government and padding your pockets. This government hasn't got the money for this and we don't either. Also you will make things worse if you start messing with the North + South Fork rivers and other places. You hired a man that

Response to comment I872-3
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I872-4
Comment noted.

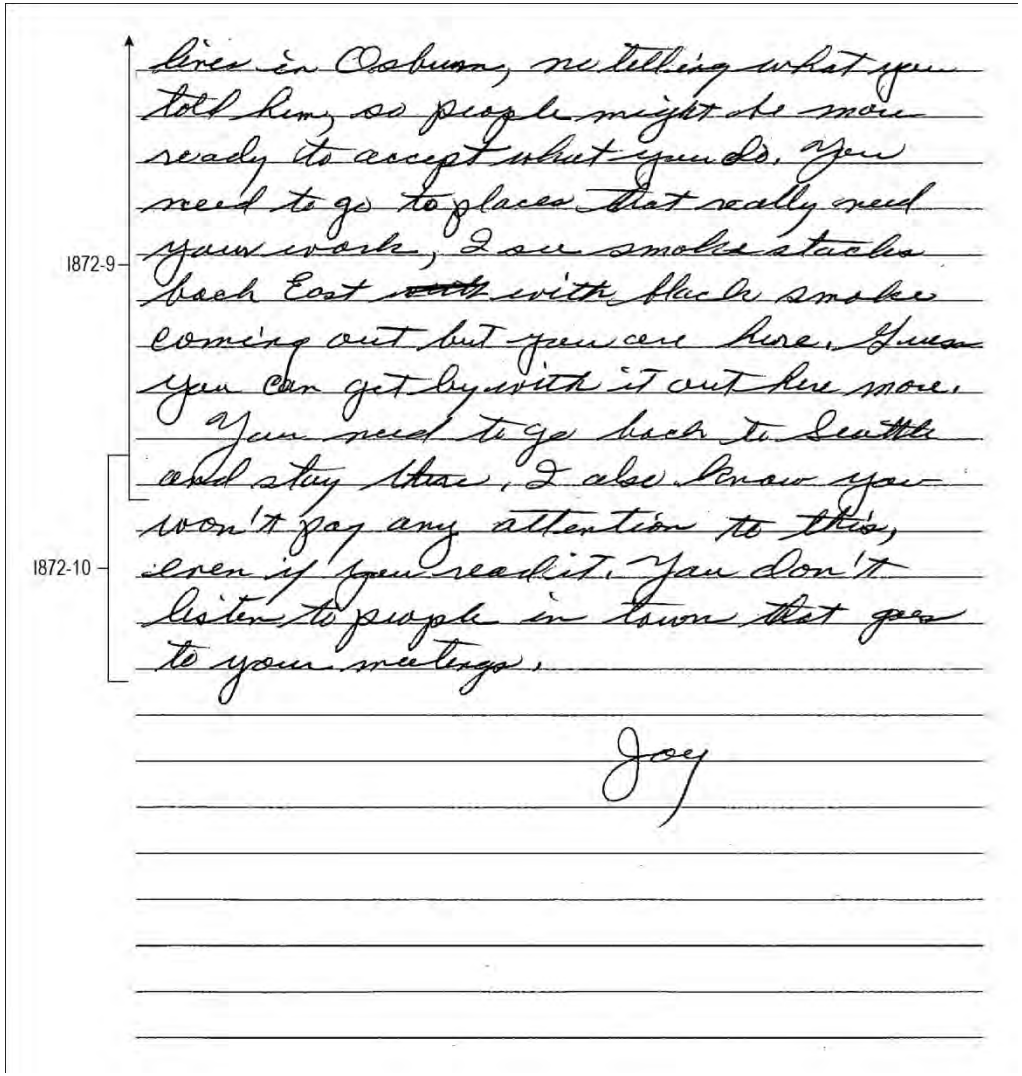
Response to comment I872-5
See response to Comment No. LJ39-5.

Response to comment I872-6
Comment noted.

Response to comment I872-7
See responses to Comment Nos. I58-2 and I295-3.

Response to comment I872-8
See response to Comment No. I54-8.

Response to comment I872-9
Comment noted.



lives in Osburn, not telling what you told him, so people might be more ready to accept what you do. You need to go to places that really need your work, I see smoke stacks back East ~~with~~ with black smoke coming out but you are here. I mean you can get by with it out here more. You need to go back to Seattle and stay there. I also know you won't pay any attention to this, even if you read it. You don't listen to people in town that go to your meetings.

Joey

I872-9

I872-10

Response to comment I872-10

See response to Comment No. I295-2.

Kammarcal, Randy, I664, Letter 618274

Randy Kammarcal
Date: November 15, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

Randy Kammarcal, National Account Manager. I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I664-1 — EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I664-2 — I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. We urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Randy Kammarcal
National Account Manager

618274

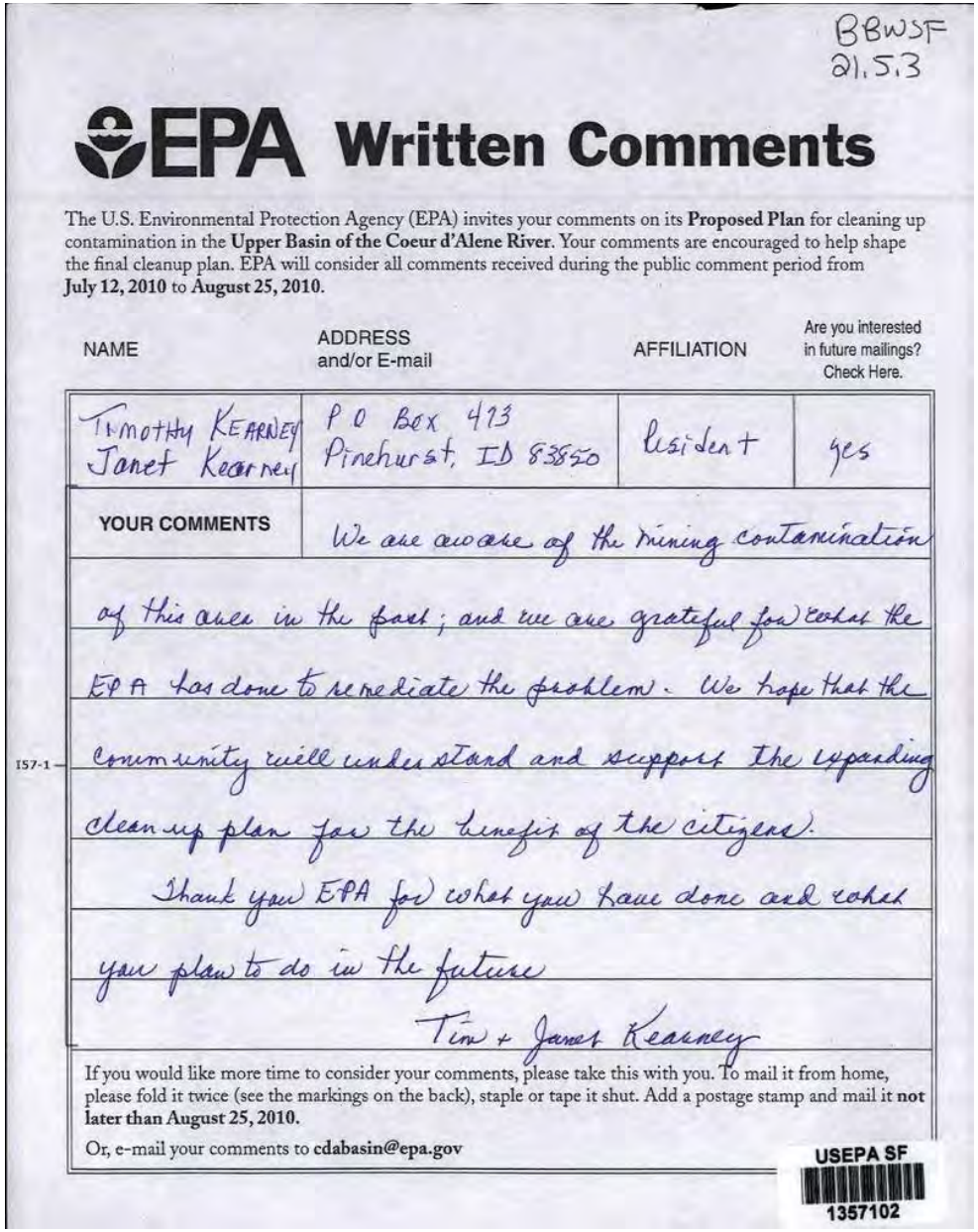
Response to comment I664-1

See responses to Comment Nos. I58-1 and I474-1.

Response to comment I664-2

See response to Comment No. I474-2.

Kearney, Janet; Kearney, Timothy, I57, Letter 1357102



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Timothy KEARNEY Janet Kearney	P O Box 473 Pinehurst, ID 83850	Resident	yes

YOUR COMMENTS

We are aware of the mining contamination of this area in the past; and we are grateful for what the EPA has done to remediate the problem. We hope that the community will understand and support the expanding clean up plan for the benefit of the citizens.

I57-1

Thank you EPA for what you have done and what you plan to do in the future

Tim + Janet Kearney

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

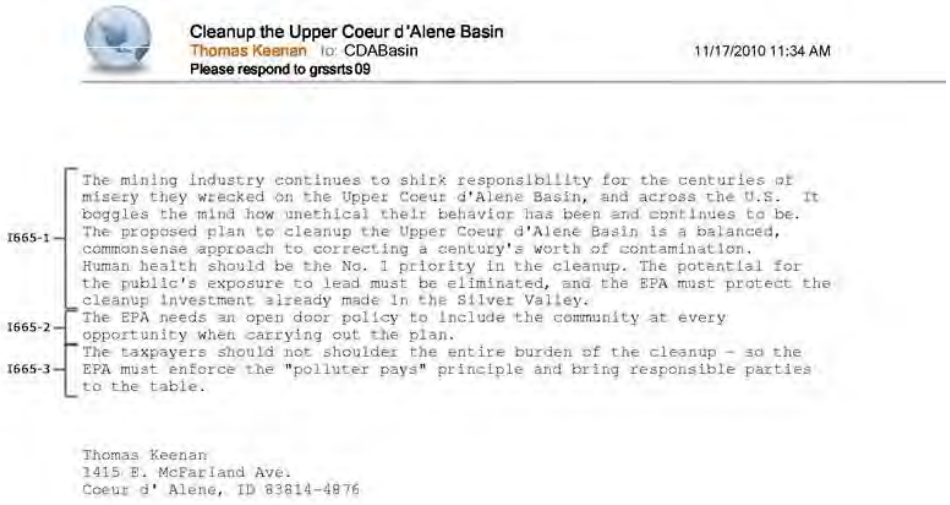
Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357102

Response to comment I57-1

Thank you for your comments.

Keenan, Thomas D., I665, Letter 618275



Cleanup the Upper Coeur d'Alene Basin
Thomas Keenan to: CDABasin 11/17/2010 11:34 AM
Please respond to grssrts09

I665-1 The mining industry continues to shirk responsibility for the centuries of misery they wrecked on the Upper Coeur d'Alene Basin, and across the U.S. It boggles the mind how unethical their behavior has been and continues to be. The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I665-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I665-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Thomas Keenan
1415 E. McFarland Ave.
Coeur d' Alene, ID 83814-4876

618275

Response to comment I665-1

See response to Comment No. I295-1.

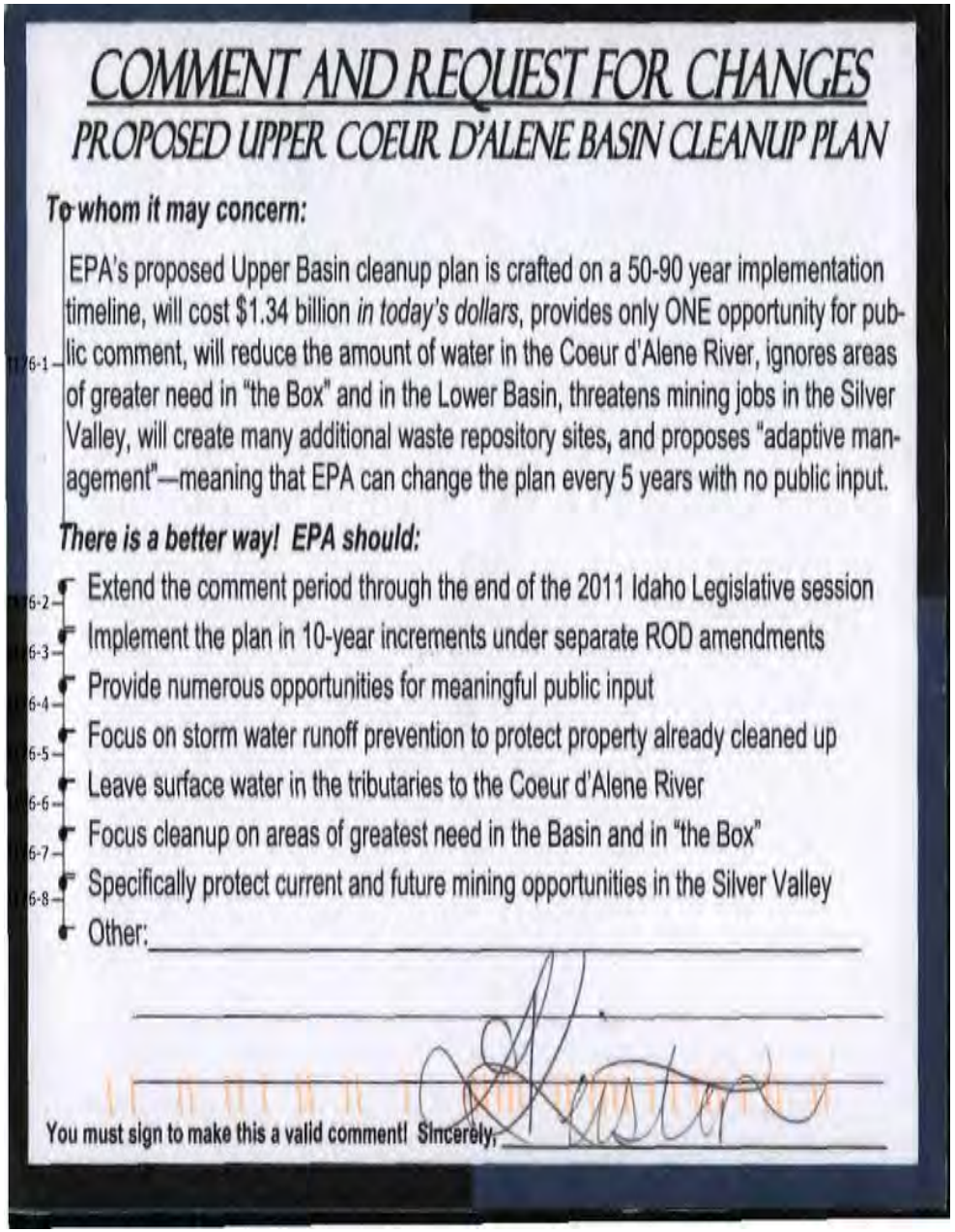
Response to comment I665-2

See response to Comment No. I295-2.

Response to comment I665-3

See response to Comment No. I295-3.

Keister, Lois, I176, Letter 1357369



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I176-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I176-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I176-3 Implement the plan in 10-year increments under separate ROD amendments
- I176-4 Provide numerous opportunities for meaningful public input
- I176-5 Focus on storm water runoff prevention to protect property already cleaned up
- I176-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I176-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I176-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely, Keister

Response to comment I176-1
See response to Comment No. I25-1.

Response to comment I176-2
See response to Comment No. I25-2.

Response to comment I176-3
See response to Comment No. I25-3.

Response to comment I176-4
See response to Comment No. I25-4.

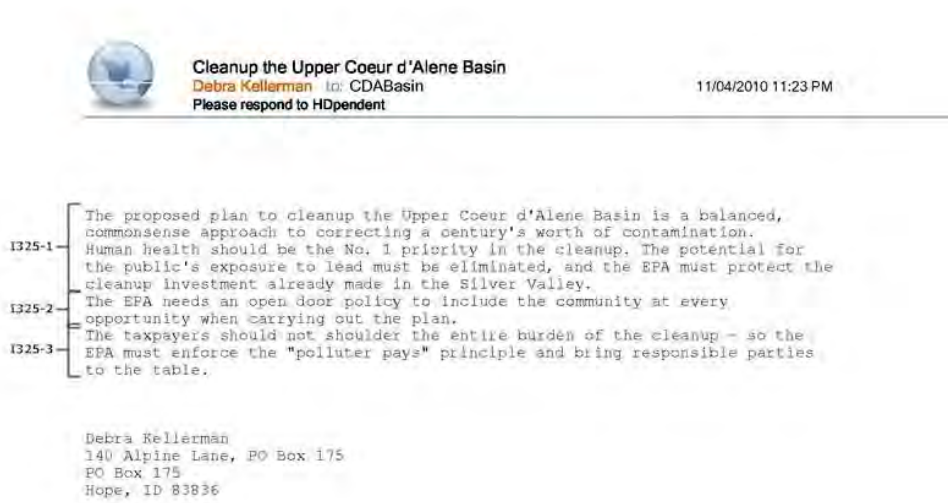
Response to comment I176-5
See response to Comment No. I25-5.

Response to comment I176-6
See response to Comment No. I25-6.

Response to comment I176-7
See response to Comment No. I25-7.

Response to comment I176-8
See response to Comment No. I25-8.

Kellerman, Debra, I325, Letter 614455



Cleanup the Upper Coeur d'Alene Basin
Debra Kellerman to: CDABasin 11/04/2010 11:23 PM
Please respond to HDpendent

I325-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I325-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I325-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Debra Kellerman
140 Alpine Lane, PO Box 175
PO Box 175
Hope, ID 83836

614455

Response to comment I325-1

See response to Comment No. I295-1.

Response to comment I325-2

See response to Comment No. I295-2.

Response to comment I325-3

See response to Comment No. I295-3.

Kelley, William, I489, Letter 1308944

BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I489-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I489-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I489-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

William C Kelley

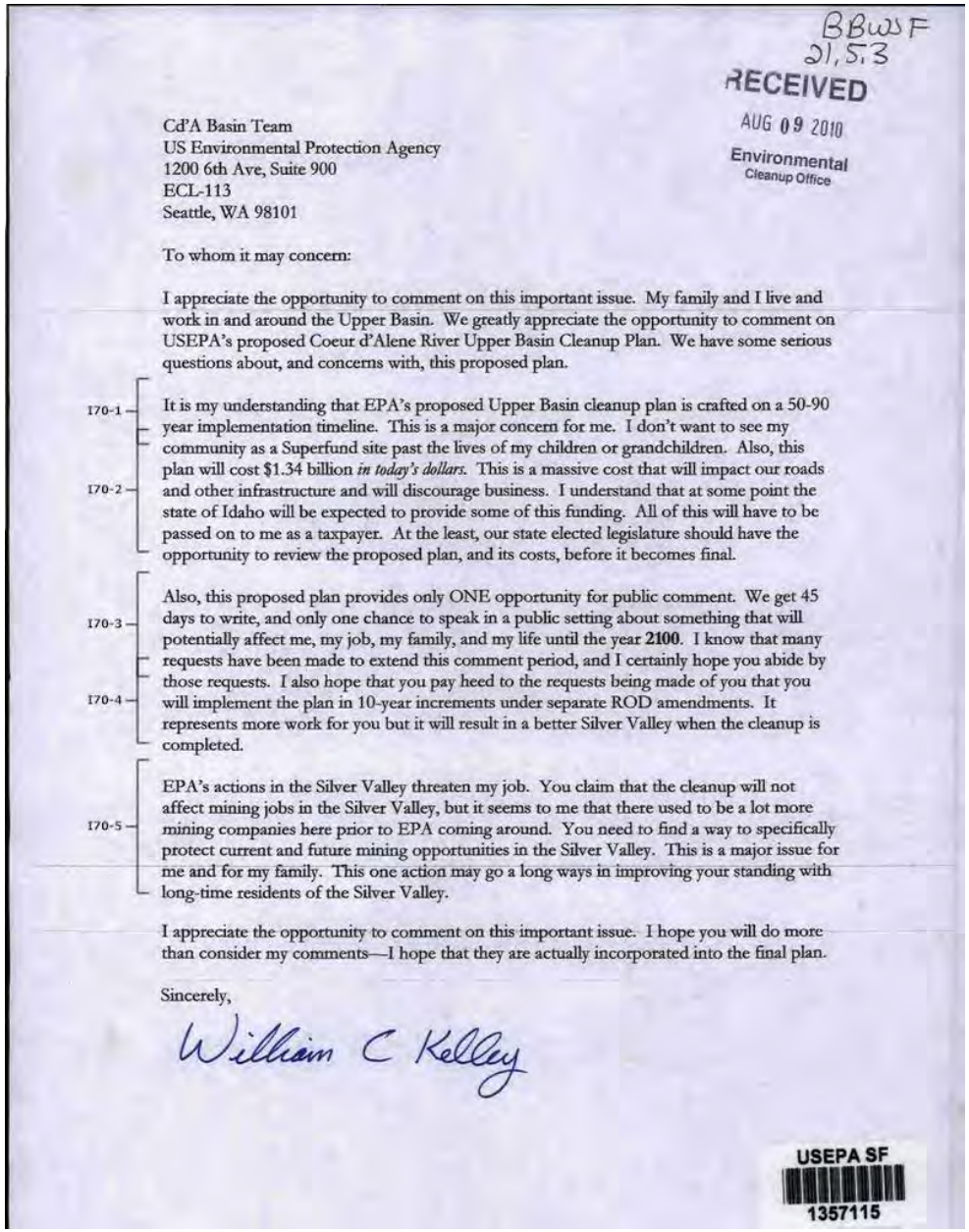
USEPA SF
1308944

Response to comment I489-1
See response to Comment No. I474-1.

Response to comment I489-2
See response to Comment No. I474-2.

Response to comment I489-3
See response to Comment No. I474-3.

Kelley, William, I70, Letter 1357115



BBWSF
21,5,3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I70-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I70-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I70-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by
I70-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I70-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

William C Kelley

USEPA SF
1357115

Response to comment I70-1
See response to Comment No. I58-1.

Response to comment I70-2
See response to Comment No. I58-2.

Response to comment I70-3
See response to Comment No. I58-3.

Response to comment I70-4
See response to Comment No. I58-4.

Response to comment I70-5
See response to Comment No. I58-5.

Kelly, Sharon, I666, Letter 618276

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
heyne1@msn.com to: formsubmission 11/18/2010 07:08 PM
Sent by: Heyne1@Msn.Com <heyne1=msn.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: SHARON KELLY
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

1666-1

The beautiful and historic Silver Valley's Residents desirve the right to "pursue life, Liberty and and happiness in their own Silver Valley where most of them have spent their entire lives following several generations of family members prior to the current generation. Our Federal Government has no right to take over their territory and stand in the way of future expansion and progress of the Silver Valley, holding up NEW INDUSTRIES MOVING INTO THE SILVER VALLEY AND CREATING MORE JOBS FOR FOLKS WHO LIVE THERE. The 90 year plan proposed by EPA means several NEW generations born in that area who will be ROBBED of new and better paying jobs.

1666-2

EPA should shut their 90 year plan down completely, get out of the way of Silver Valley's progress which will benefit the Residents who already live there, and those new generations to come. If such clean ups REALLY exist and need to be done, the 10 year plan wanted by they Residents is the one that should be used under our States laws and leadership. After all, those Residents who have lived there most of or, even their entire lives, are far more educated about what may be wrong with all facets of their area, than any

1666-3

618276

Response to comment I666-1

See response to Comment No. I351-1.

Response to comment I666-2

See responses to Comment Nos. I295-1 and I54-2.

Response to comment I666-3

See response to Comment No. I474-2.

I666-3 EPA person, many of which don't KNOW much of anything about the Silver Valley's needs when it comes to mining damage since they've NEVER been living there to explore the valley, and/or get to understand what is REALLY A PROBLEM, nor HOW TO FIX IT. If EPA supervisor's would get their very flawed 90 year plan shut down and out of the way, tje Valley's REAL problems could be repaired on the 10 year plan proposedand, no doubt would get the job done MUCH FASIER, and A WHOLE LOT CHEAPER!

I666-4 It appears to me that the EPA's 90 year plan is nothing more than HIGH UP Federal workers guaranteeng THEMSELVES A LIFE-LONG JOB WITH HIGH SALARARIES, AND POSSIBLY DOUBLE THAT SALARY FOR THEIR OWN RETIREMENT YEARS. A lot of that is going on right now, steered by the 'bama Administration! So, knock it off, already, and get out of the Silver Valley Residents way. Let THEM HAVE THose JOBS, AND GET IT DONE ON THE 10 YEAR PLAN, UNDER THE STATE OF IDAHO'S SUPERVISION AND LAWS.

I666-5 We IDAHOANS, may be RED-NECKS, BUT WE ARE NOT DUMB, OR STUPID. Residents are as smart and capable of fixing their own Valley's needs and repairs as any other AMERICANS, and having lived there for many years, may well be MORE capable than most other AMERICANS. I feel quite certain that living in the Silver Valley, and being a Minor takes a lot more guts than MOST OTHER AMERICANS CAN CLAIM!!!

I666-6 I lived in the Silver for two and a half years beginning in 1997, and never saw or heard of any Resident dying from bad water, lead in their yards, nor any other "environmental" problem. The valley Residents were obviously managing their towns and villages very well, and I enjoyed every minute that I had the pleasure of living in the Silver Valley, got to know a lot of people who were very intelligent, knew all about any REAL environmental problems and were VERY capable of explaining them clearly to me, the new greenhorn in their Valley.

I666-7 I came from Oregon, sold insurance, and had total access through my cliental to watch, for 16 years, all the UNIVERSITY STUDENTS, PROFESSORS, AND COLLEGE STUDENTS AND PROFESSORS DESTROY THE TIMBER INDUSTRY, THE COMMERCIAL FISHING INDUSTRY, THE DEMOLITION INDUSTRY, AND SO MANY SMALL BUSINESSES for no other reason that SAVING THE SPOTTED OWL!!! My specialty was WORKMAN'S COMPENSATION & selling for a non-STATE insurance company I HAD COMPANIES IN ALL THREE OF OREGON'S MAJOR INDUSTRIES PREVIOUSLY MENTIONED WHICH GAVE ME FIRST HAND STORIES ABOUT WHAT WAS GOING ON WITH THE ENVIRONMENTALISTS HOARDS. Then I moved back to Idaho, and watched the

I666-8 Environrmentalists here in Idaho, working on destroying the logging industry, and the mining industry here in Idaho. ENOUGH, ALREADY!!

SHARON Y KELLY
Coeur d'Alene Basin Resident: Yes
Email Address: heynel@msn.com
Mailing Address: SHARON Y KELLY, 5526 N. MT. CARROL ST.|COEUR D' ALENE|IDAHO|83815-9653|US
Phone Number: (208) 277-7709

Response to comment I666-4
Comment noted. See response to Comment No. I474-2.

Response to comment I666-5
Comment noted.

Response to comment I666-6
As described in the FFS, Proposed Plan and ROD Amendment, unacceptable risks to human health and the environment in the Upper Basin over time are well documented. The Selected Remedy is expected to make considerable progress in addressing these risks. See response to Comment No. I295-1.

Response to comment I666-7
Comment noted.

Response to comment I666-8
See response to Comment No. I54-2.

Keough, Shawn, I667, Letter 618277

comments on the Coeur d'Alene Basin plan
Senator Shawn Keough
to:
CDABasin
11/18/2010 09:01 AM
Show Details

Dear EPA Officials,
I am submitting comments today, 11/18/10, on the EPA's plan in the Coeur d'Alene Basin.

I667-1 I cannot support the EPA's plan. It appears to ignore the NAS input, it is extremely expensive with no apparent relevant activity and outcome tied to the expense, it proposes to place an undue and un-payable expense on the State of Idaho which currently has an unemployment rate of over 9% and a budget gap of $ 400 million dollars and it is not supported by the vast majority of people living within the Silver Valley. I667-2

I667-3 Further, it is a top down plan whereas a local group has a plan that is far less expensive that achieves relevant goals while supporting and growing the economy in the area.

It is my hope that the EPA will not proceed with this plan.

Thank you for your consideration.
Sincerely,
Shawn Keough

Senator Shawn Keough
District One: Boundary and northern Bonner Counties
P.O. Box 101
Sandpoint, ID 83864
Home Tel: 208-263-1839
During the Legislative Session January thru March: Toll Free Information Center in Boise: 800-626-0471
www.shawnkeough.com

618277

Response to comment I667-1

See response to Comment No. LJ27-8.

Response to comment I667-2

See responses to Comment Nos. I58-2 and LJ27-8.

Response to comment I667-3

See response to Comment No. I474-2.

Keough, Shawn, I668, Letter 618278

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

skeough@senate.idaho.gov to: formsubmission 11/18/2010 08:52 AM

Sent by: Skeough@Senate.Idaho.Gov <skeough=senate.idaho.gov

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Shawn Keough
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: skeough@senate.idaho.gov
Mailing Address: P.O. Box 101|Sandpoint|Idaho|83864|US
Phone Number: (208) 263-1839

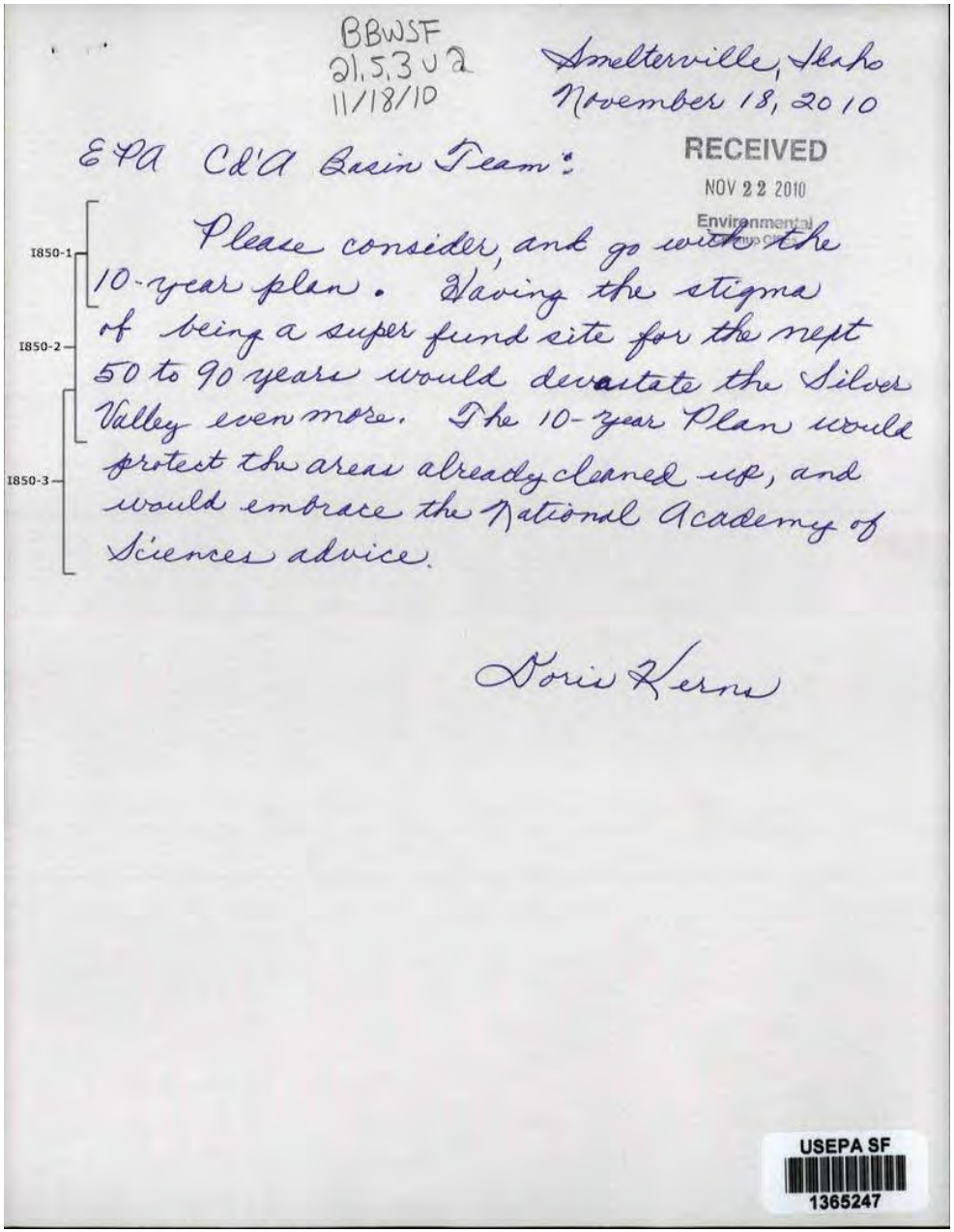
I668-1

618278

Response to comment I668-1

See response to Comment No. I351-1.

Kerns, Doris, I850, Letter 1365247



BBWSF
21.5.3 v 2
11/18/10

Smelterville, Idaho
November 18, 2010

EPA Cd'A Basin Team:

RECEIVED
NOV 22 2010
Environmental

I850-1 Please consider, and go with the 10-year plan. Having the stigma
I850-2 of being a super fund site for the next 50 to 90 years would devastate the Silver
Valley even more. The 10-year Plan would protect the areas already cleaned up, and
I850-3 would embrace the National Academy of Sciences advice.

Doris Kerns

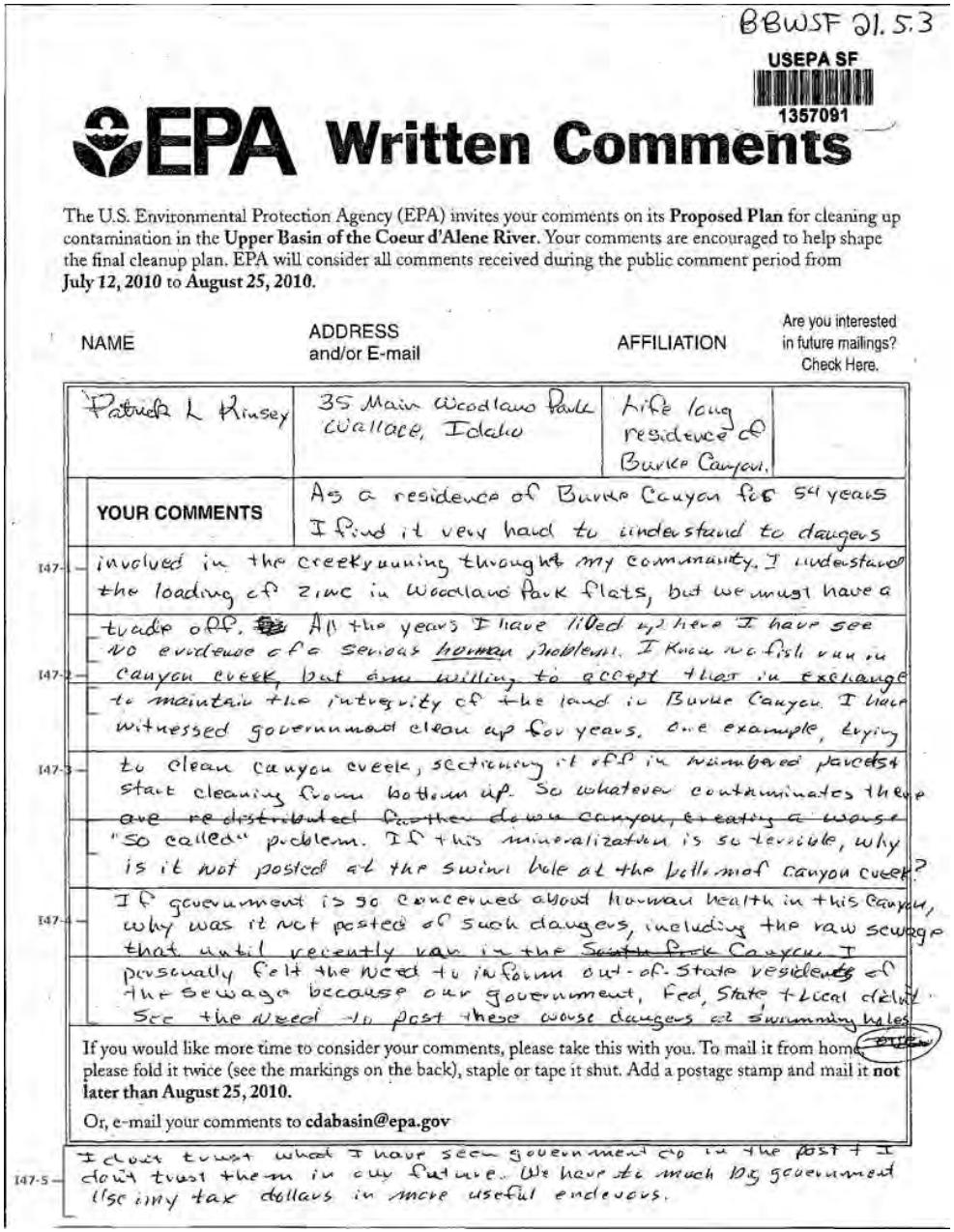
USEPA SF
1365247

Response to comment I850-1
See response to Comment No. I474-2.

Response to comment I850-2
See response to Comment No. I474-1.

Response to comment I850-3
See response to Comment No. I474-2.

Kinsey, Patrick, I47, Letter 1357091



BBWSF 21.5.3

USEPA SF
1357091

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River.** Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010.**

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Patrick L Kinsey	35 Main Woodland Park Wallace, Idaho	Life long residence of Burke Canyon.	

YOUR COMMENTS

As a residence of Burke Canyon for 54 years I find it very hard to understand to dangers

I47-1 involved in the creek running throught my community. I understand the loading of zinc in Woodland Park flats, but we must have a trade off. All the years I have lived up here I have see no evidence of a serious human problem. I know no fish run in

I47-2 Canyon creek, but am willing to accept that in exchange to maintain the integrity of the land in Burke Canyon. I have witnessed governmmed clean up for years. One example, trying

I47-3 to clean Canyon creek, sectioning it off in numbered parcels start cleaning from bottom up. So whatever contaminates there are redistributed further down canyon, creating a worse "so called" problem. If this mineralization is so terrible, why is it not posted at the swimming hole at the bottom of Canyon creek?

I47-4 If government is so concerned about human health in this Canyon, why was it not posted of such dangers, including the raw sewage that until recently ran in the South Fork Canyon. I personally felt the need to inform out-of-State residents of the sewage because our government, Fed, State + Local didn't see the need to post these worse dangers at swimming holes

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

I47-5 I don't trust what I have seen government do in the post + I don't trust them in our future. We have to much big government use my tax dollars in more useful endevors.

Response to comment I47-1
See response to Comment No. I295-1.

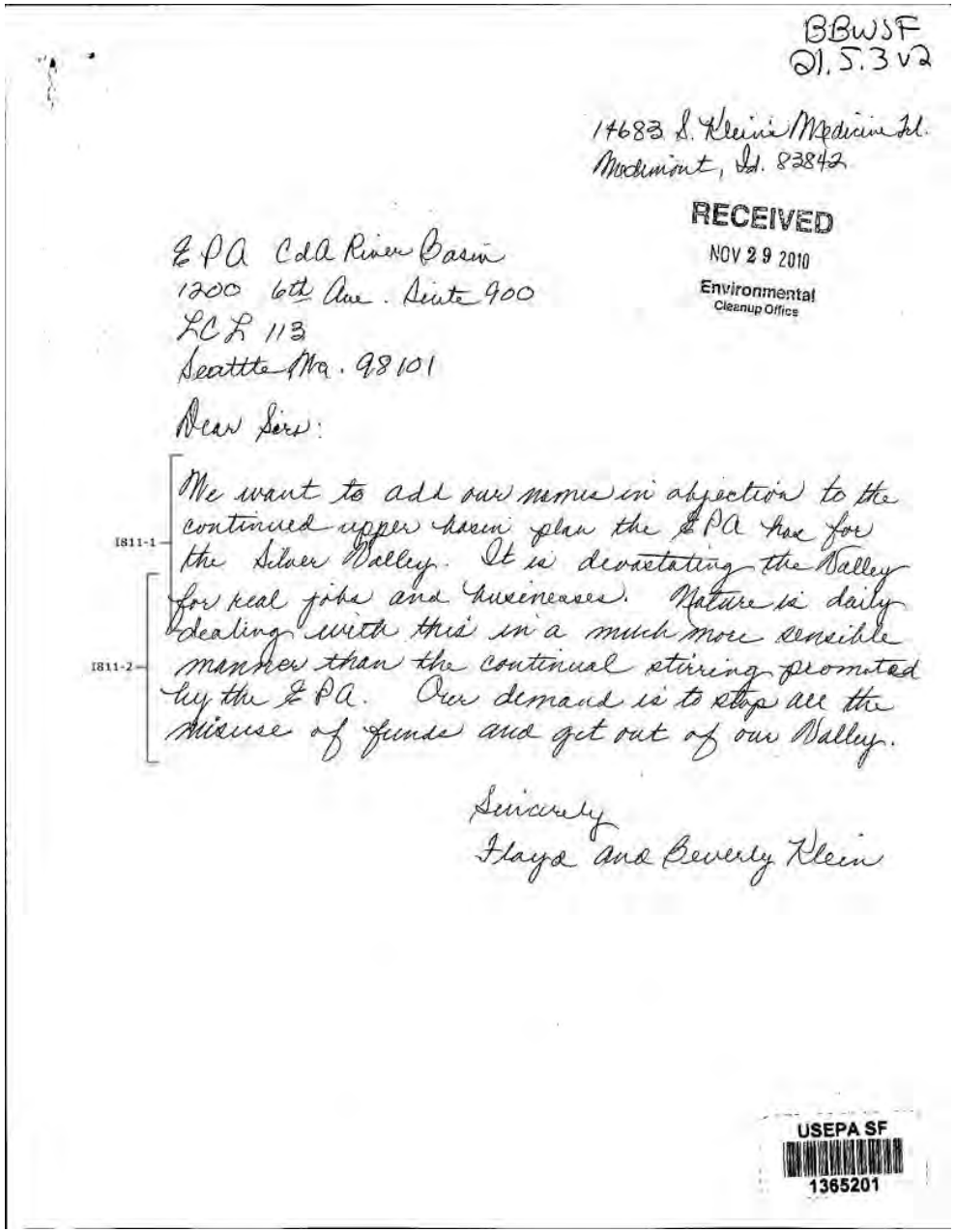
Response to comment I47-2
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. As described in the ROD Amendment, the levels of contamination significantly exceed acceptable state and site-specific water quality standards.

Response to comment I47-3
Comment noted. EPA has begun the process of prioritizing actions, and potential for recontamination is part of this prioritization.

Response to comment I47-4
Comment noted.

Response to comment I47-5
Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. See response to Comment No. I295-3.

Klein, Beverly, I811, Letter 1365201



BBWSF
21.5.3 v2

17683 S. Klein Meadow Rd.
Moscow, Id. 83843

RECEIVED
NOV 29 2010
Environmental
Cleanup Office

EPA CdA River Basin
1200 6th Ave. Suite 900
LCL 113
Seattle Wa. 98101

Dear Sirs:

I811-1 We want to add our names in objection to the continued upper basin plan the EPA has for the Silver Valley. It is devastating the Valley for real jobs and businesses. Nature is daily dealing with this in a much more sensible manner than the continual stirring promoted by the EPA. Our demand is to stop all the misuse of funds and get out of our Valley.

I811-2

Sincerely
Hayes and Beverly Klein

USEPA SF
1365201

Response to comment I811-1

See responses to Comment Nos. I54-2 and I58-5.

Response to comment I811-2

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Klepfer, Eric, I387, Letter 616278

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
eklepfer@roadrunner.com to: formsubmission 11/11/2010 08:14 PM
Sent by: Eklepfer@Roadrunner.Com <eklepfer=roadrunner.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Eric Klepfer
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: eklepfer@roadrunner.com
Mailing Address: 13058 Sherwood Court|Hayden Lake|Idaho|83838|US
Phone Number:

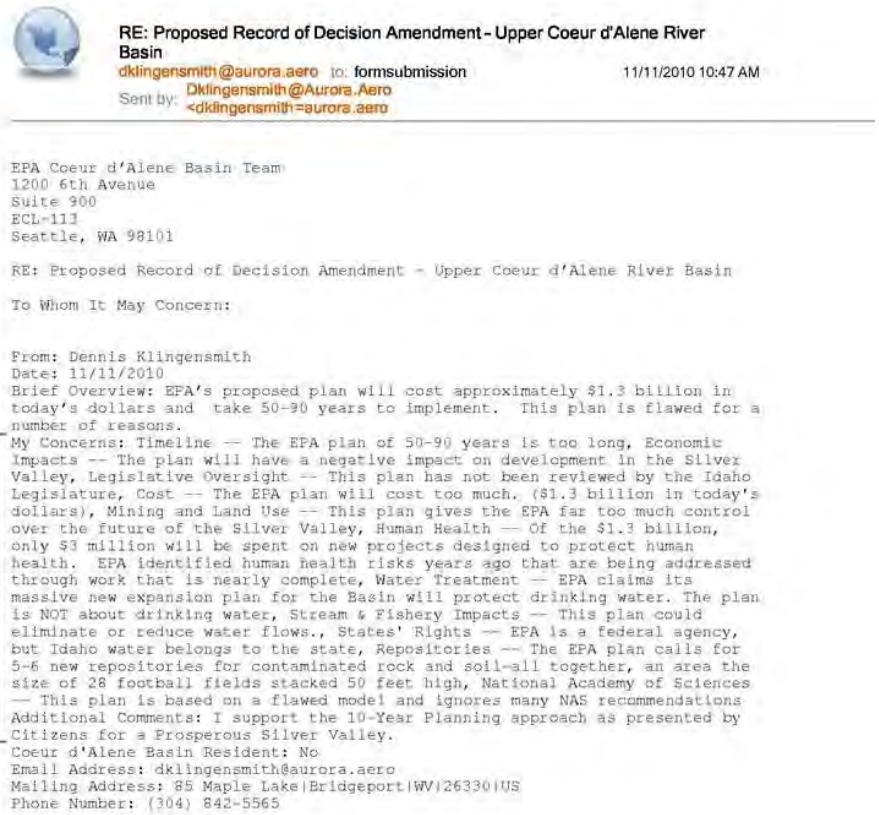
I387-1

616278

Response to comment I387-1

See response to Comment No. I351-1.

Klingensmith, Dennis, I388, Letter 616279



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
dklingensmith@aurora.aero to: formsubmission 11/11/2010 10:47 AM
Sent by: Dklingensmith@Aurora.Aero <dklingensmith=aurora.aero

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-111
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Dennis Klingensmith
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: dklingensmith@aurora.aero
Mailing Address: 85 Maple Lake|Bridgeport|WV|26330|US
Phone Number: (304) 842-5565

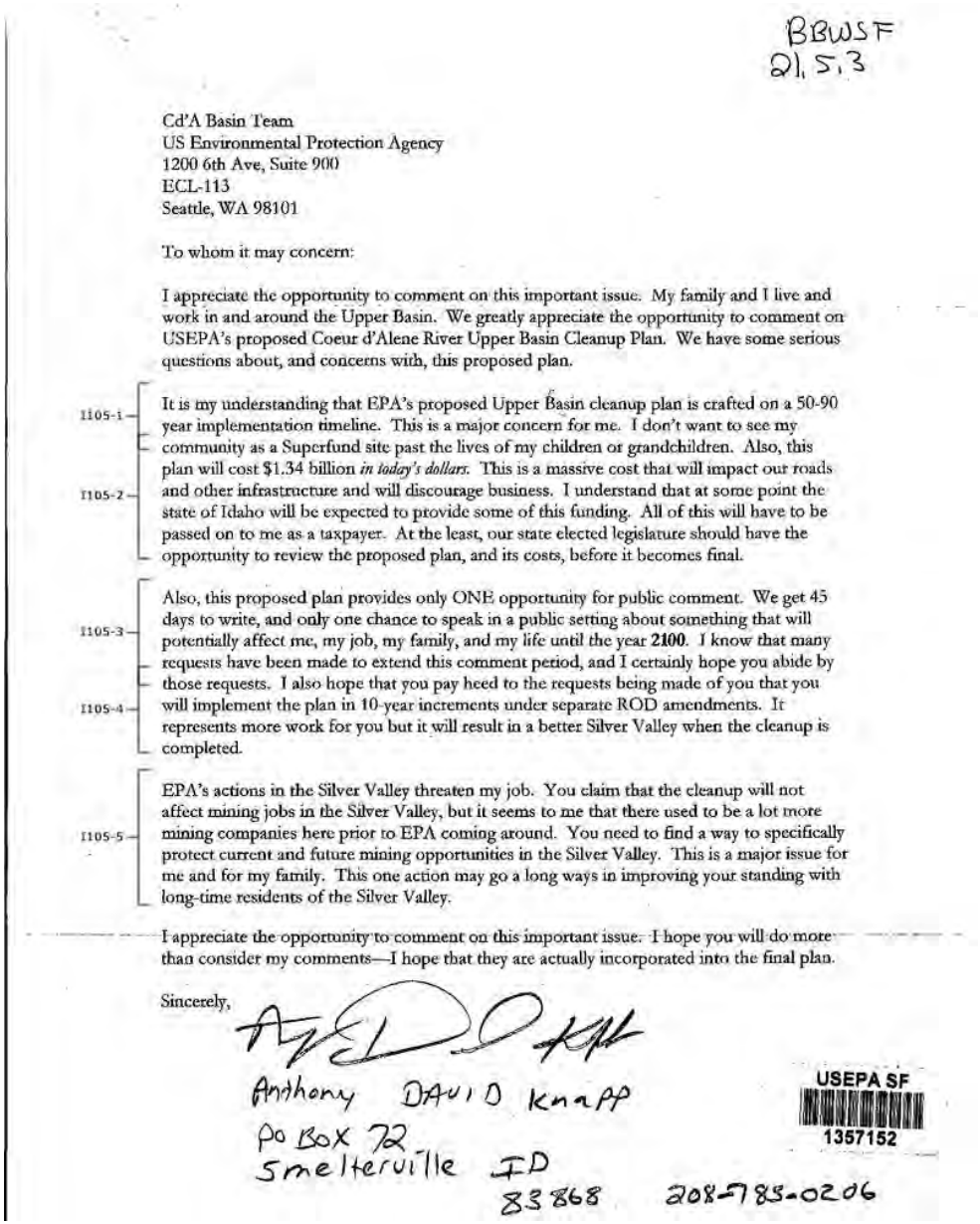
I388-1

616279

Response to comment I388-1

See response to Comment No. I351-1.

Knapp, Anthony D., I105, Letter 1357152



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I105-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I105-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I105-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I105-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I105-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Anthony DAVID Knapp
Po Box 72
Smelterville ID
83868 208-785-0206

USEPA SF
1357152

Response to comment I105-1
See response to Comment No. I58-1.

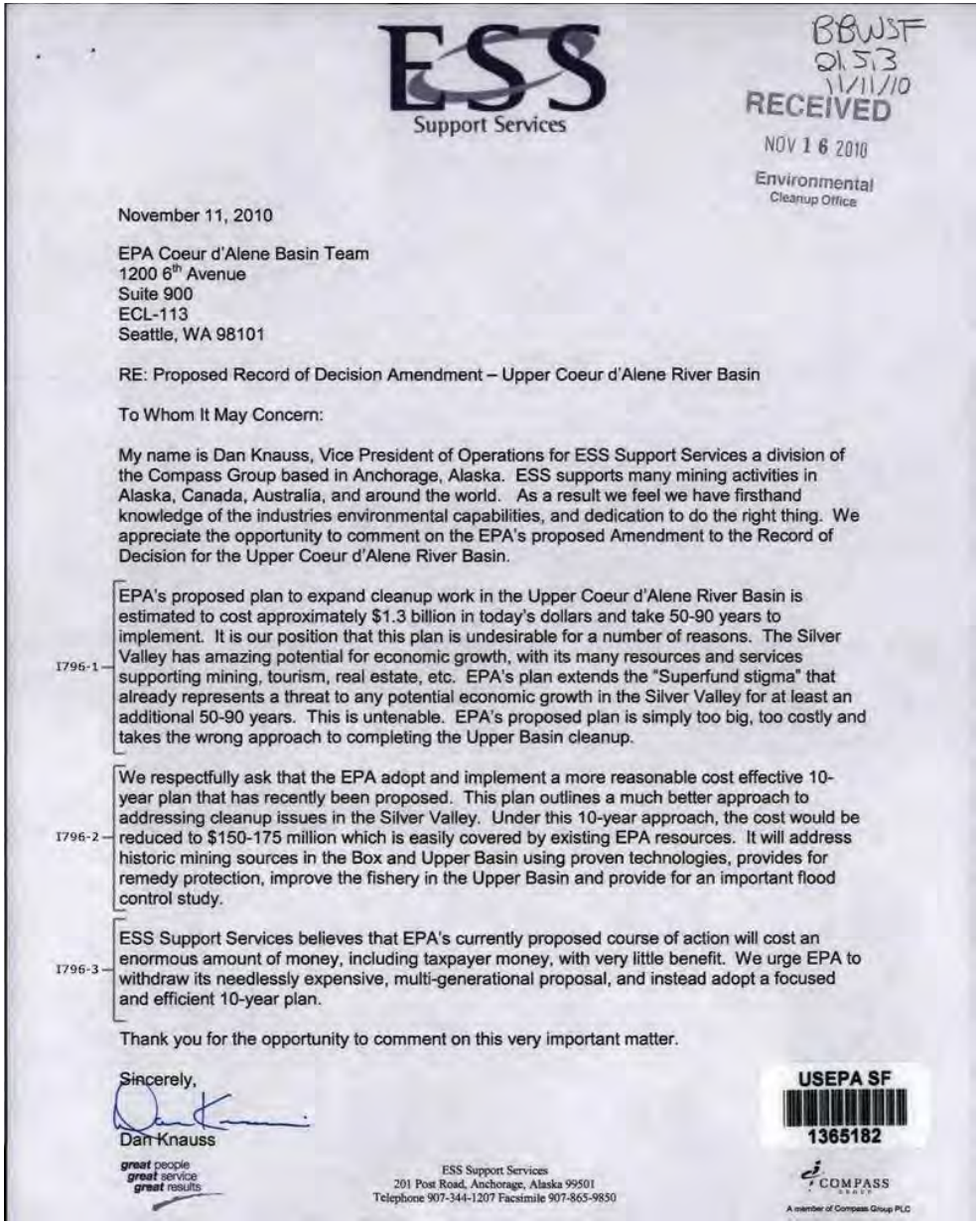
Response to comment I105-2
See response to Comment No. I58-2.

Response to comment I105-3
See response to Comment No. I58-3.

Response to comment I105-4
See response to Comment No. I58-4.

Response to comment I105-5
See response to Comment No. I58-5.

Knauss, Dan, I796, Letter 1365182



ESS Support Services

BBWSF
21.513
11/11/10
RECEIVED
NOV 16 2010
Environmental
Cleanup Office

November 11, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

My name is Dan Knauss, Vice President of Operations for ESS Support Services a division of the Compass Group based in Anchorage, Alaska. ESS supports many mining activities in Alaska, Canada, Australia, and around the world. As a result we feel we have firsthand knowledge of the industries environmental capabilities, and dedication to do the right thing. We appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I796-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is our position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I796-2 We respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provides for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I796-3 ESS Support Services believes that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. We urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Dan Knauss

great people
great service
great results

ESS Support Services
201 Post Road, Anchorage, Alaska 99501
Telephone 907-344-1207 Facsimile 907-865-9850

USEPA SF
1365182

COMPASS
A member of Compass Group PLC

Response to comment I796-1

See response to Comment No. I474-1.

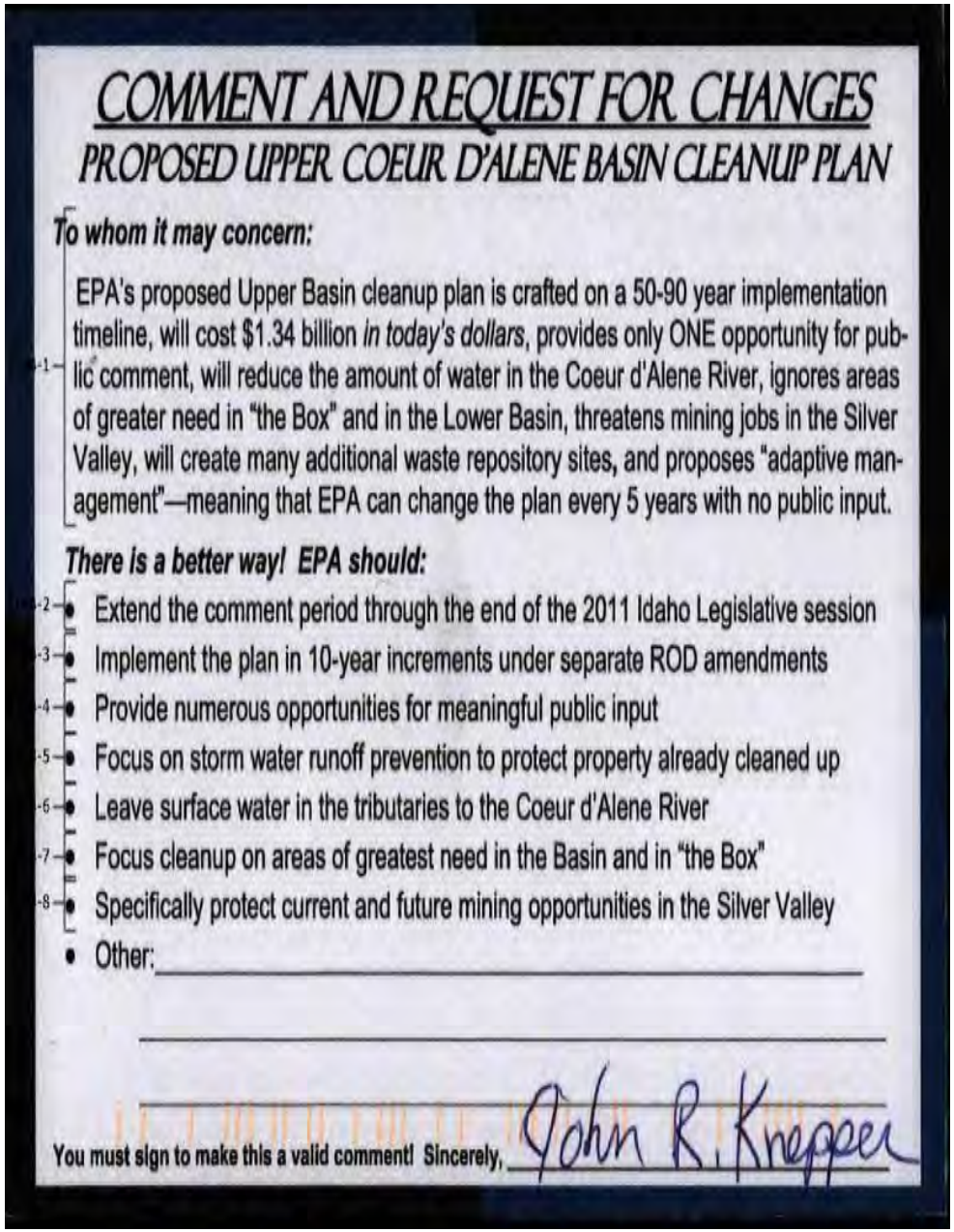
Response to comment I796-2

See response to Comment No. I474-2.

Response to comment I796-3

See response to Comment No. I474-3.

Knepper, John, I194, Letter 1357506



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I194-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I194-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I194-3 Implement the plan in 10-year increments under separate ROD amendments
- I194-4 Provide numerous opportunities for meaningful public input
- I194-5 Focus on storm water runoff prevention to protect property already cleaned up
- I194-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I194-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I194-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, John R. Knepper

Response to comment I194-1
See response to Comment No. I25-1.

Response to comment I194-2
See response to Comment No. I25-2.

Response to comment I194-3
See response to Comment No. I25-3.

Response to comment I194-4
See response to Comment No. I25-4.

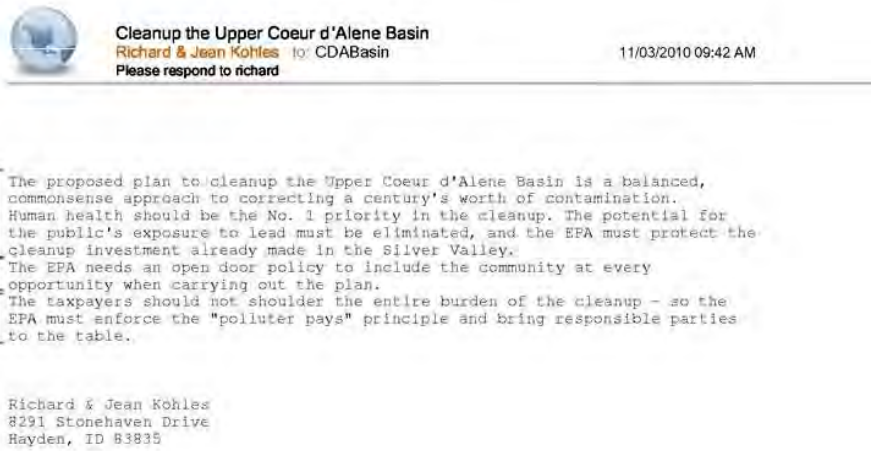
Response to comment I194-5
See response to Comment No. I25-5.

Response to comment I194-6
See response to Comment No. I25-6.

Response to comment I194-7
See response to Comment No. I25-7.

Response to comment I194-8
See response to Comment No. I25-8.

Kohles, Richard; Kohles, Jean, I326, Letter 614456



Cleanup the Upper Coeur d'Alene Basin
Richard & Jean Kohles to: CDABasin 11/03/2010 09:42 AM
Please respond to richard

I326-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I326-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I326-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Richard & Jean Kohles
8291 Stonehaven Drive
Hayden, ID 83835

614456

Response to comment I326-1

See response to Comment No. I295-1.

Response to comment I326-2

See response to Comment No. I295-2.

Response to comment I326-3

See response to Comment No. I295-3.

Kopf, Edwin, I669, Letter 618279

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
roselakeed@gmail.com to: formsubmission 11/19/2010 08:37 AM
Sent by: Roselakeed@Gmail.Com <roselakeed=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Edwin Kopf
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. This Federal program is another invasive action that
has caused the expulsion of president Obama and his elite group of control freaks. Any plan to HELP must be in cooperation with area residents and not forced upon them against their wills. Another sad fact is our historial mining sites are being destroyed, and present mining operations (and employment) is severly restricted through mega-overregulations. This must stop.
Coeur d'Alene Basin Resident: Yes
Email Address: roselakeed@gmail.com
Mailing Address: Edwin & Mary Kopf, 24155 E, Doyle Rd.,|Cataldo|Idaho|83810|US
Phone Number: (208) 682-4174

I669-1
I669-2
I669-3

618279

Response to comment I669-1

See response to Comment No. I351-1.

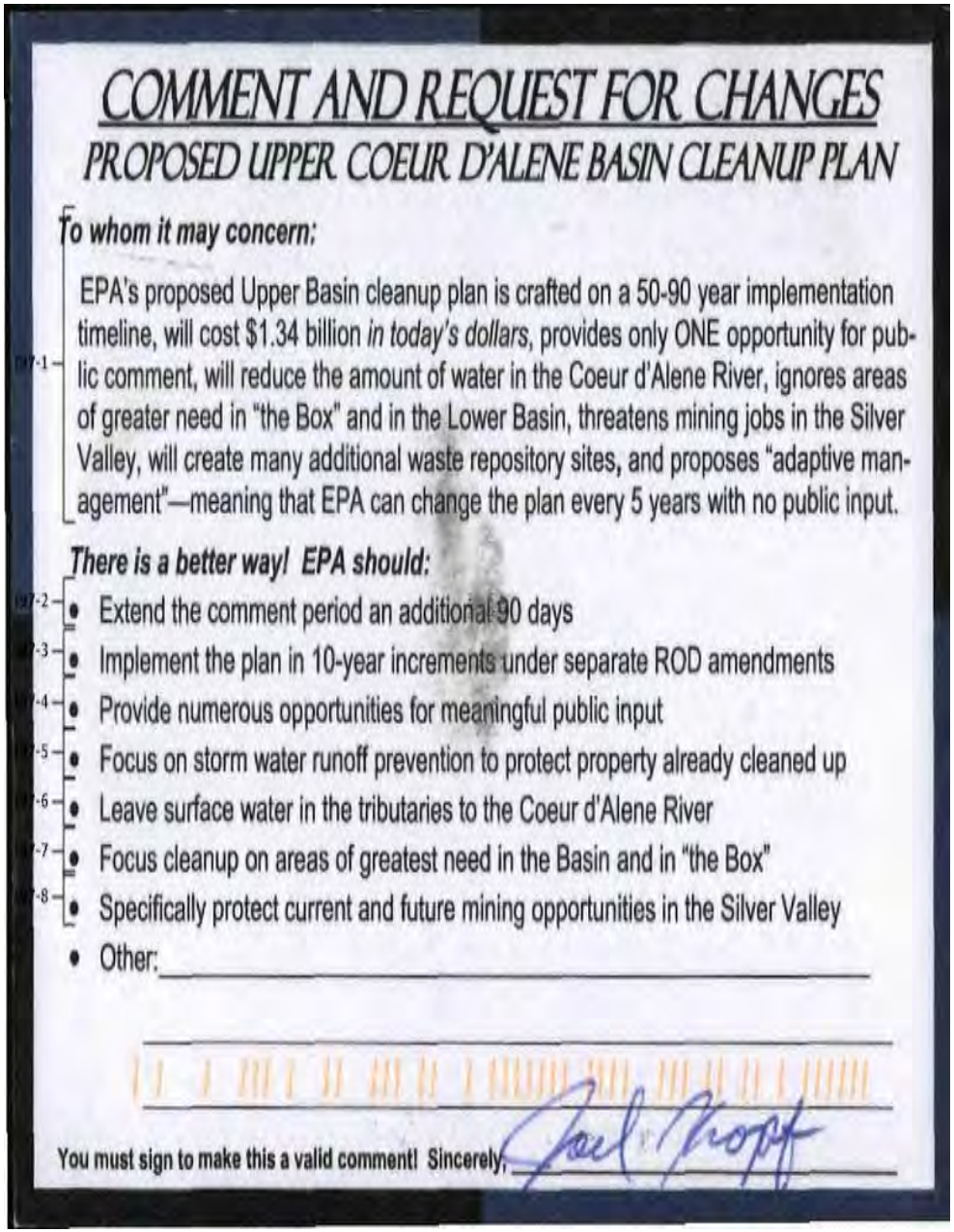
Response to comment I669-2

See responses to Comment Nos. I295-2 and LJ39-5.

Response to comment I669-3

EPA has identified the National Historic Preservation Act (NHPA) as an applicable or relevant and appropriate requirement for the Selected Remedy. EPA intends to comply with substantive requirements of the NHPA as it implements the Selected Remedy. Also see response to Comment No. I58-5.

Kopf, Joel, I97, Letter 1357144



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I97-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I97-2 Extend the comment period an additional 90 days
- I97-3 Implement the plan in 10-year increments under separate ROD amendments
- I97-4 Provide numerous opportunities for meaningful public input
- I97-5 Focus on storm water runoff prevention to protect property already cleaned up
- I97-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I97-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I97-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Joel Kopf

Response to comment I97-1
See response to Comment No. I25-1.

Response to comment I97-2
See response to Comment No. I25-2.

Response to comment I97-3
See response to Comment No. I25-3.

Response to comment I97-4
See response to Comment No. I25-4.

Response to comment I97-5
See response to Comment No. I25-5.

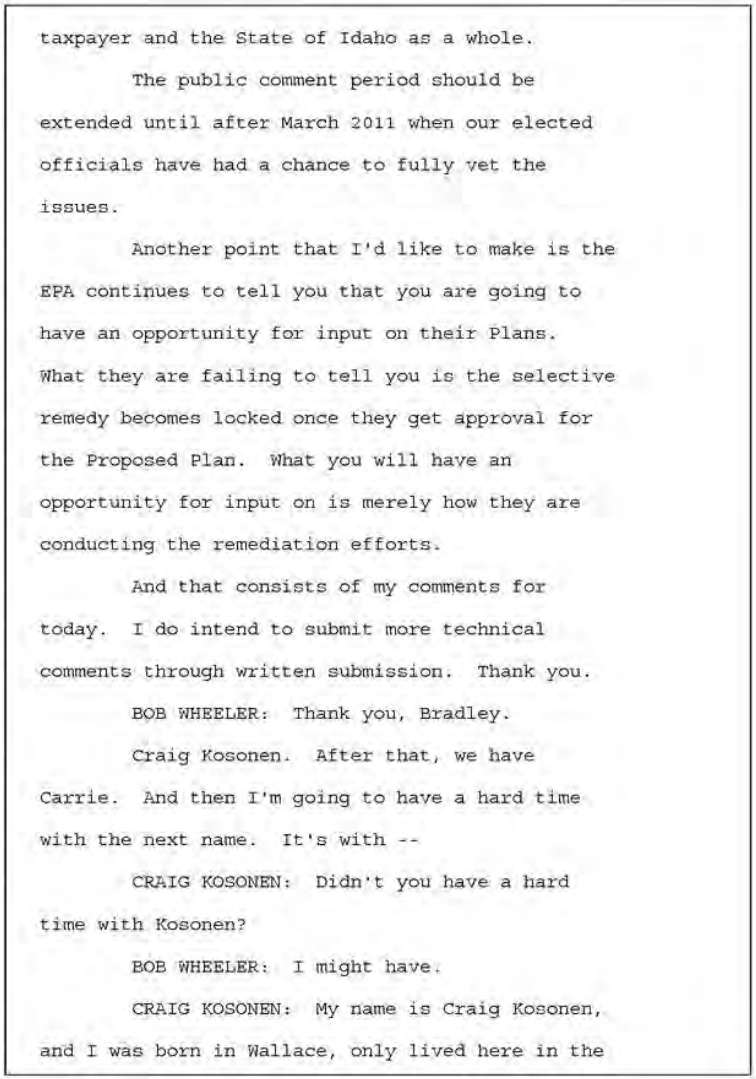
Response to comment I97-6
See response to Comment No. I25-6.

Response to comment I97-7
See response to Comment No. I25-7.

Response to comment I97-8
See response to Comment No. I25-8.

Kosonen, Craig, I249, Letter 610097-44

No comments



taxpayer and the State of Idaho as a whole.

The public comment period should be extended until after March 2011 when our elected officials have had a chance to fully vet the issues.

Another point that I'd like to make is the EPA continues to tell you that you are going to have an opportunity for input on their Plans. What they are failing to tell you is the selective remedy becomes locked once they get approval for the Proposed Plan. What you will have an opportunity for input on is merely how they are conducting the remediation efforts.

And that consists of my comments for today. I do intend to submit more technical comments through written submission. Thank you.

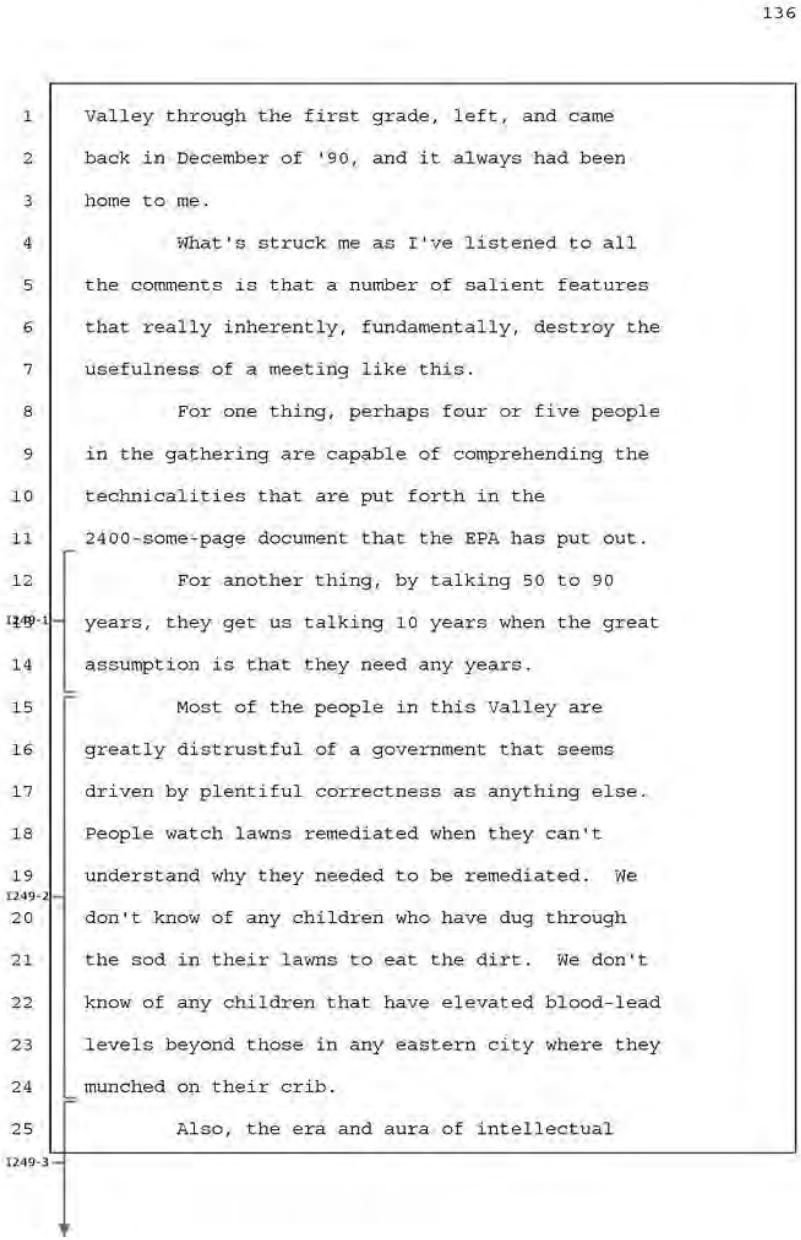
BOB WHEELER: Thank you, Bradley.

Craig Kosonen. After that, we have Carrie. And then I'm going to have a hard time with the next name. It's with --

CRAIG KOSONEN: Didn't you have a hard time with Kosonen?

BOB WHEELER: I might have.

CRAIG KOSONEN: My name is Craig Kosonen, and I was born in Wallace, only lived here in the



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Valley through the first grade, left, and came back in December of '90, and it always had been home to me.

What's struck me as I've listened to all the comments is that a number of salient features that really inherently, fundamentally, destroy the usefulness of a meeting like this.

For one thing, perhaps four or five people in the gathering are capable of comprehending the technicalities that are put forth in the 2400-some-page document that the EPA has put out.

For another thing, by talking 50 to 90 years, they get us talking 10 years when the great assumption is that they need any years.

Most of the people in this Valley are greatly distrustful of a government that seems driven by plentiful correctness as anything else. People watch lawns remediated when they can't understand why they needed to be remediated. We don't know of any children who have dug through the sod in their lawns to eat the dirt. We don't know of any children that have elevated blood-lead levels beyond those in any eastern city where they munched on their crib.

Also, the era and aura of intellectual

I249-1
I249-2
I249-3

Response to comment I249-1

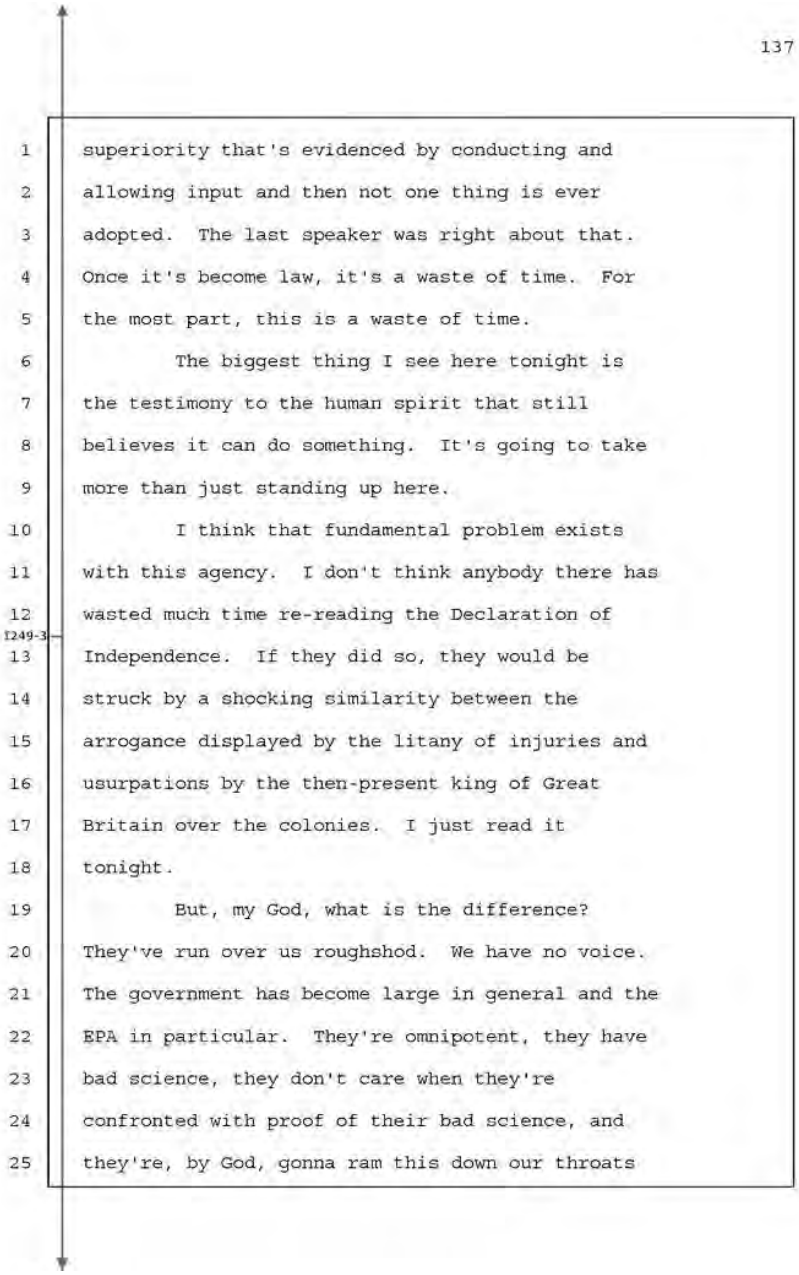
See response to Comment No. I58-1.

Response to comment I249-2

See response to Comment No. I295-1.

Response to comment I249-3

Thank you for your comments.



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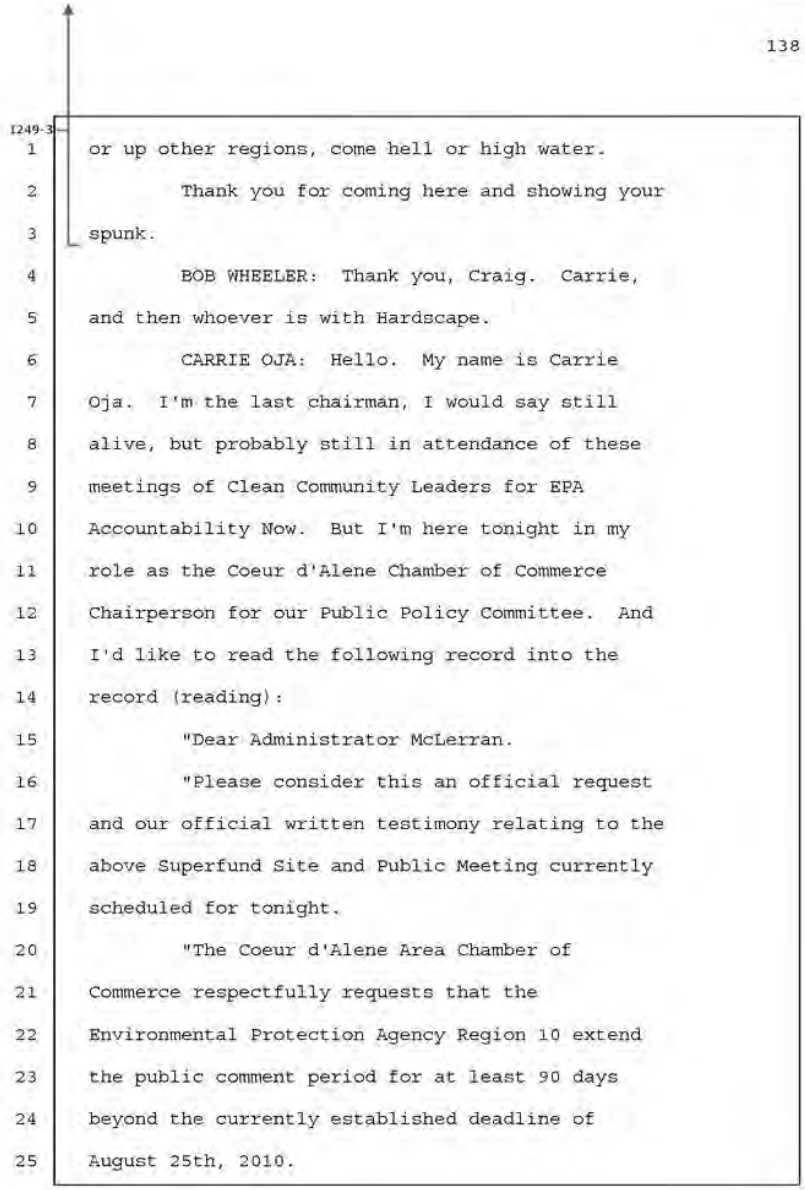
superiority that's evidenced by conducting and allowing input and then not one thing is ever adopted. The last speaker was right about that. Once it's become law, it's a waste of time. For the most part, this is a waste of time.

The biggest thing I see here tonight is the testimony to the human spirit that still believes it can do something. It's going to take more than just standing up here.

I think that fundamental problem exists with this agency. I don't think anybody there has wasted much time re-reading the Declaration of Independence. I249-3 If they did so, they would be struck by a shocking similarity between the arrogance displayed by the litany of injuries and usurpations by the then-present king of Great Britain over the colonies. I just read it tonight.

But, my God, what is the difference? They've run over us roughshod. We have no voice. The government has become large in general and the EPA in particular. They're omnipotent, they have bad science, they don't care when they're confronted with proof of their bad science, and they're, by God, gonna ram this down our throats

No comments



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I249-3

or up other regions, come hell or high water.

Thank you for coming here and showing your spunk.

BOB WHEELER: Thank you, Craig. Carrie, and then whoever is with Hardscape.

CARRIE OJA: Hello. My name is Carrie Oja. I'm the last chairman, I would say still alive, but probably still in attendance of these meetings of Clean Community Leaders for EPA Accountability Now. But I'm here tonight in my role as the Coeur d'Alene Chamber of Commerce Chairperson for our Public Policy Committee. And I'd like to read the following record into the record (reading):

"Dear Administrator McLerran.

"Please consider this an official request and our official written testimony relating to the above Superfund Site and Public Meeting currently scheduled for tonight.

"The Coeur d'Alene Area Chamber of Commerce respectfully requests that the Environmental Protection Agency Region 10 extend the public comment period for at least 90 days beyond the currently established deadline of August 25th, 2010.

No comments

Kromer, Joe, I479, Letter 1308934

BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I479-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I479-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I479-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Joe E. Kromer

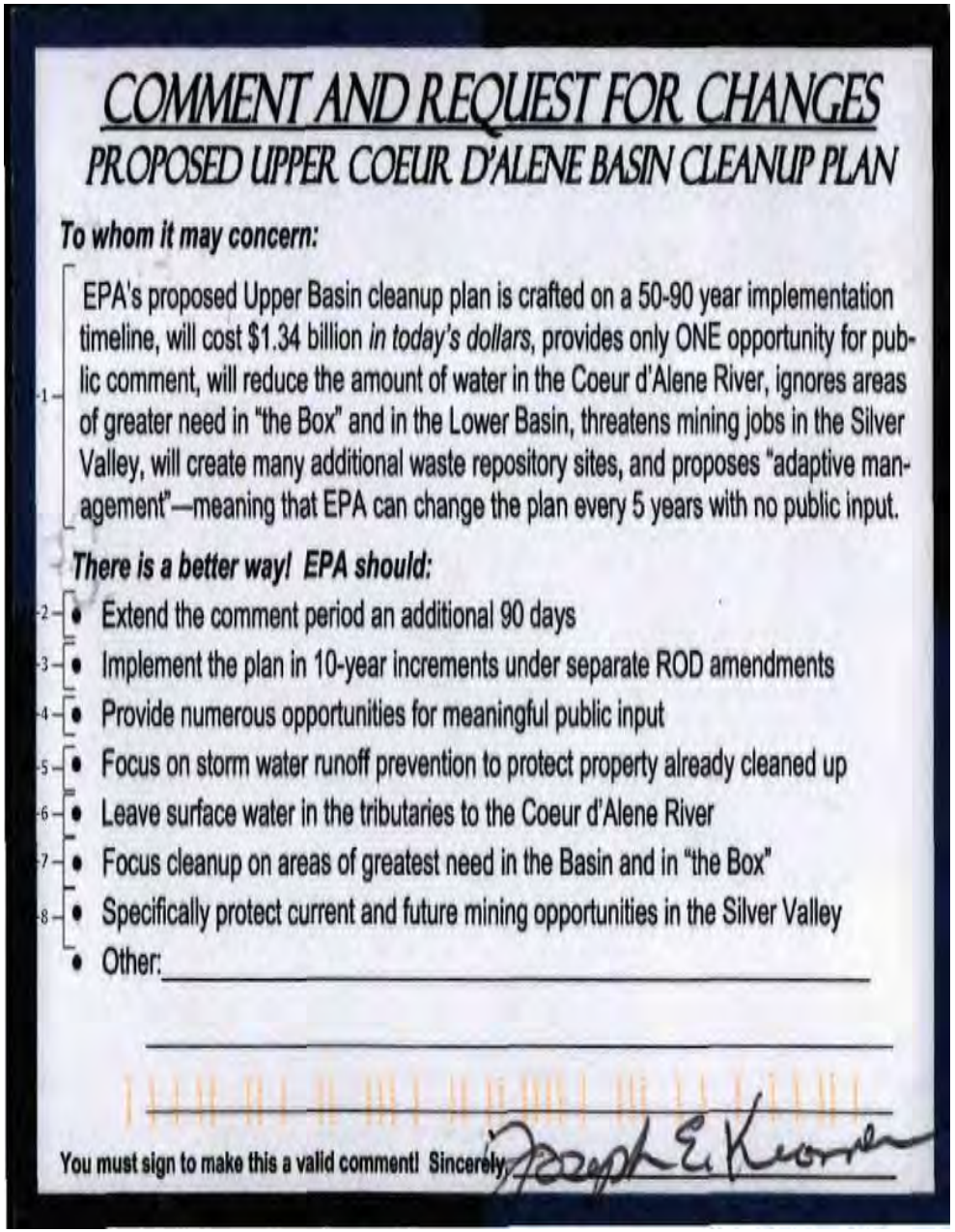
USEPA SF
1308934

Response to comment I479-1
See response to Comment No. I474-1.

Response to comment I479-2
See response to Comment No. I474-2.

Response to comment I479-3
See response to Comment No. I474-3.

Kromer, Joseph, I27, Letter 1357071



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I-27-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I-27-2 Extend the comment period an additional 90 days
- I-27-3 Implement the plan in 10-year increments under separate ROD amendments
- I-27-4 Provide numerous opportunities for meaningful public input
- I-27-5 Focus on storm water runoff prevention to protect property already cleaned up
- I-27-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I-27-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I-27-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Joseph E. Kromer

Response to comment I27-1
See response to Comment No. I25-1.

Response to comment I27-2
See response to Comment No. I25-2.

Response to comment I27-3
See response to Comment No. I25-3.

Response to comment I27-4
See response to Comment No. I25-4.

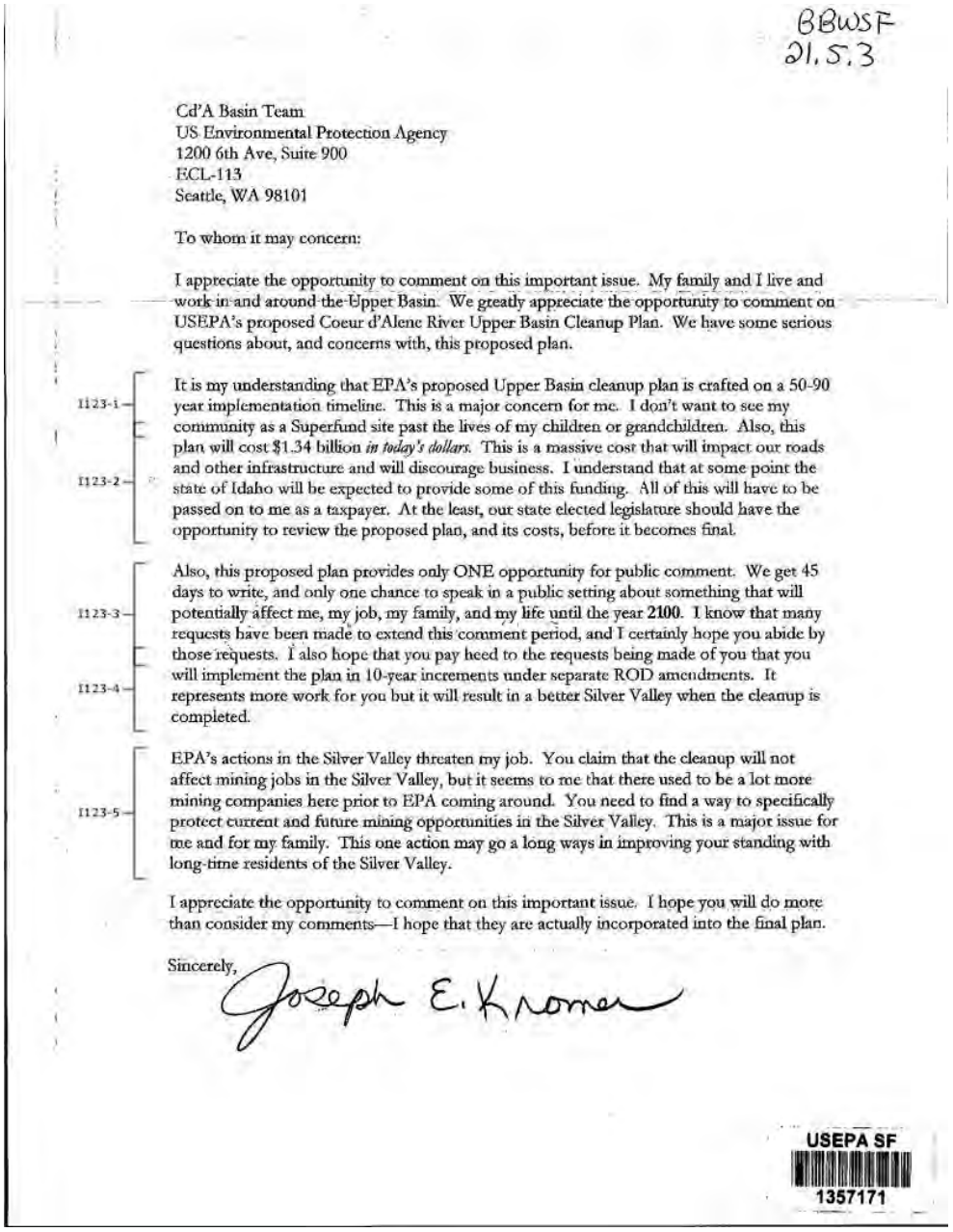
Response to comment I27-5
See response to Comment No. I25-5.

Response to comment I27-6
See response to Comment No. I25-6.

Response to comment I27-7
See response to Comment No. I25-7.

Response to comment I27-8
See response to Comment No. I25-8.

Kromer, Joseph, I123, Letter 1357171



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I123-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I123-2

I123-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I123-4

I123-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Joseph E. Kromer

USEPA SF
1357171

Response to comment I123-1
See response to Comment No. I58-1.

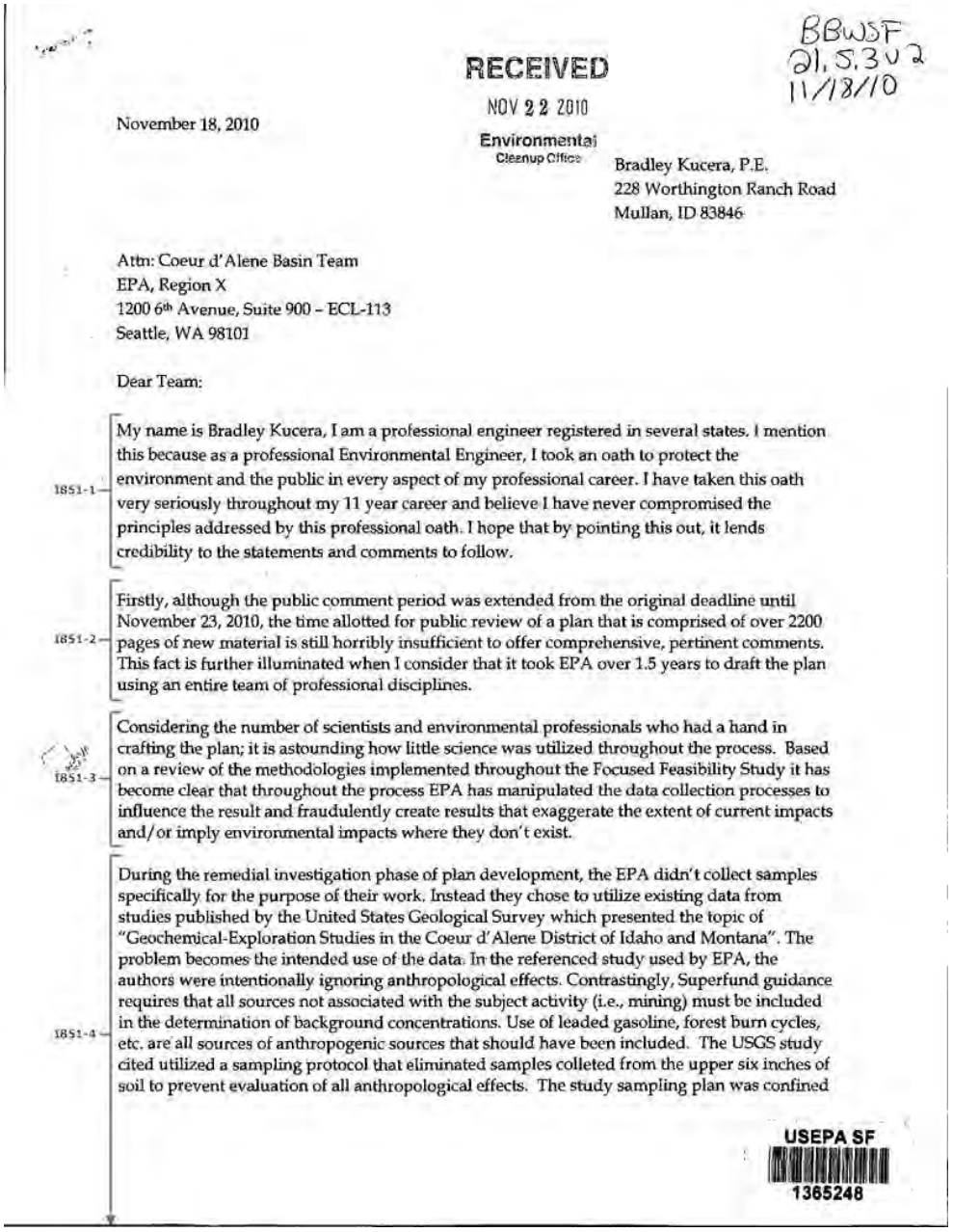
Response to comment I123-2
See response to Comment No. I58-2.

Response to comment I123-3
See response to Comment No. I58-3.

Response to comment I123-4
See response to Comment No. I58-4.

Response to comment I123-5
See response to Comment No. I58-5.

Kucera, Bradley, I851, Letter 1365248



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RECEIVED
NOV 22 2010
Environmental
Cleanup Office

November 18, 2010

Bradley Kucera, P.E.
228 Worthington Ranch Road
Mullan, ID 83846

Attn: Coeur d'Alene Basin Team
EPA, Region X
1200 6th Avenue, Suite 900 – ECL-113
Seattle, WA 98101

Dear Team:

I851-1 My name is Bradley Kucera, I am a professional engineer registered in several states. I mention this because as a professional Environmental Engineer, I took an oath to protect the environment and the public in every aspect of my professional career. I have taken this oath very seriously throughout my 11 year career and believe I have never compromised the principles addressed by this professional oath. I hope that by pointing this out, it lends credibility to the statements and comments to follow.

I851-2 Firstly, although the public comment period was extended from the original deadline until November 23, 2010, the time allotted for public review of a plan that is comprised of over 2200 pages of new material is still horribly insufficient to offer comprehensive, pertinent comments. This fact is further illuminated when I consider that it took EPA over 1.5 years to draft the plan using an entire team of professional disciplines.

I851-3 Considering the number of scientists and environmental professionals who had a hand in crafting the plan; it is astounding how little science was utilized throughout the process. Based on a review of the methodologies implemented throughout the Focused Feasibility Study it has become clear that throughout the process EPA has manipulated the data collection processes to influence the result and fraudulently create results that exaggerate the extent of current impacts and/or imply environmental impacts where they don't exist.

I851-4 During the remedial investigation phase of plan development, the EPA didn't collect samples specifically for the purpose of their work. Instead they chose to utilize existing data from studies published by the United States Geological Survey which presented the topic of "Geochemical-Exploration Studies in the Coeur d'Alene District of Idaho and Montana". The problem becomes the intended use of the data. In the referenced study used by EPA, the authors were intentionally ignoring anthropological effects. Contrastingly, Superfund guidance requires that all sources not associated with the subject activity (i.e., mining) must be included in the determination of background concentrations. Use of leaded gasoline, forest burn cycles, etc. are all sources of anthropogenic sources that should have been included. The USGS study cited utilized a sampling protocol that eliminated samples colleted from the upper six inches of soil to prevent evaluation of all anthropological effects. The study sampling plan was confined

USEPA SF
1365248

Response to comment I851-1

Comment noted.

Response to comment I851-2

EPA has provided a wide range of opportunities for community participation in the selection of a remedy for the Upper Basin. Since late 2008, EPA has hosted and/or attended about 60 meetings to share information and gather input for development of the Focused Feasibility Study (FFS) Report and the Proposed Plan. EPA has engaged local residents, elected officials, community groups, and many other stakeholders in the decision making process. This outreach has included working with the Basin Commission, its Technical Leadership Group, and the Citizens' Coordinating Council. EPA also submitted drafts of the FFS Report to stakeholders and the Basin Commission's Upper Basin Project Focus Team for review and comment to assist EPA in preparing a final report. EPA's efforts to provide opportunities for public participation more than satisfy the requirements of CERCLA, the Superfund law, and the National Oil and Hazardous Substances Pollution Contingency Plan.

Response to comment I851-3

The remedy selection process was conducted in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. Unacceptable risks to human health and the environment in the Upper Basin have been well documented through numerous studies, as noted in the Proposed Plan, ROD Amendment, and documents included in the administrative record that supports the Selected Remedy. EPA used generally accepted scientific methodologies when it collected and analyzed environmental and toxicological data during the remedy selection process that proceeded the Selected Remedy.

Response to comment I851-4

The comment raises four main points, each of which is addressed in the paragraphs below.

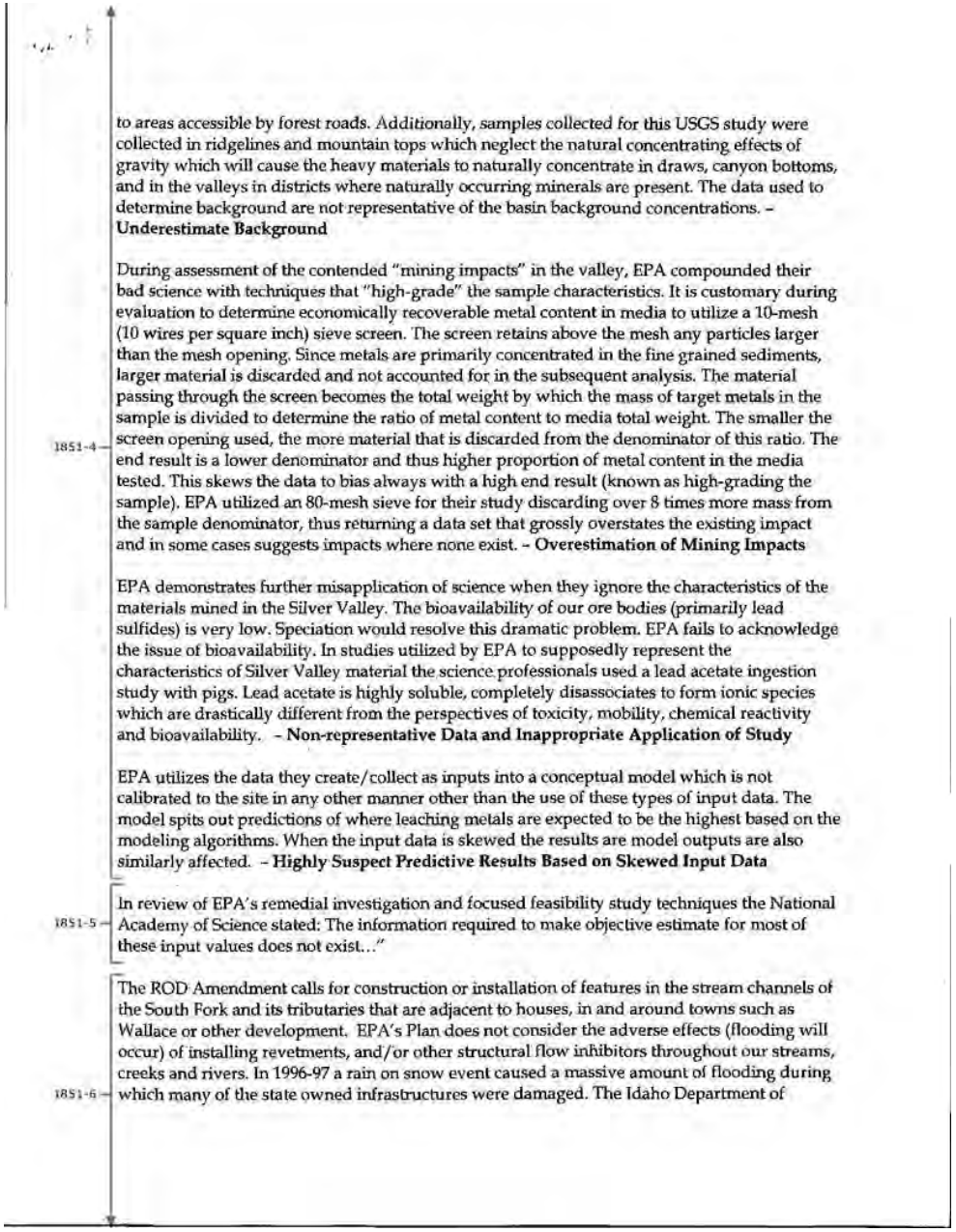
Background Concentrations -- EPA conducted extensive analyses and evaluations of background conditions as part of the RI/FS in documented in 2001.h. These

analyses and evaluations conclusively demonstrated that the dominant source of metals is from mining-related activities, not natural sources. A comprehensive analysis of background concentrations, representing more than 10,000 samples, can be found in the RI/FS Technical Memorandum (Revision 3): "Estimation of Background Concentrations in Soils, Sediments, and Surface Water in the Coeur d'Alene and Spokane River Basins," EPA 2001. Because metal concentrations are naturally variable, the analysis quantified the range of background concentrations for each metal and selected the 90th percentile for soils and sediments and the 95th percentile for surface water as the representative background concentrations. The background concentrations identified for the Upper Basin represent the most mineralized conditions and are different from background sediment concentrations for the Lower Basin, Coeur d'Alene Lake, and Spokane River. The background soil/sediment and surface water metal concentrations are far below, indeed are small fractions of the existing concentrations in the mining-impacted media targeted for cleanup by the Selected Remedy. Furthermore, the background soil and sediment lead levels are far below the soil/sediment cleanup level (530 milligrams/kilogram) reflected in the Selected Remedy.

Use of 8-mesh Sieve During 2001 RI -- The 175 micrometer (µm) (80-mesh sieve) soil sampling technique used in the Bunker Hill Box and Basin was adopted in 1974 during the original lead health studies and was used for all residential soil and dust samples collected in the Basin RI/FS (EPA, 2001, *Bunker Hill Mine Water Management Remedial Investigation/Feasibility Study*). The procedure was developed to represent the size range of particles most likely to adhere to children's hands and be ingested during normal hand-to-mouth activities. The selection of this standard pre-dates recent recommendations from EPA. However, subsequent research has shown that this size-range represents inadvertent soil ingestion of particles most likely to adhere to skin (Driver, J.H., J.J. Konz, G.K. Whitmyre, 1989, "Soil Adherence to Human Skin," *Bulletin of Environmental Contamination and Toxicology* 43: 814-20; Kissel, J.C., K.Y. Richter, and R.A. Fenske, 1996, "Factors Affecting Soil Adherence to Skin in Hand-Press Trials," *Bulletin of Environmental Contamination and Toxicology* 56:722-8; Que Hee, S.S., B. Peace, C.S. Clark, J.R. Boyle, R.L. Bornschein, and P.B. Hammond, 1985, "Evolution of Efficient Methods to Sample Lead Sources, such as House Dust and Hand Dust, in the Homes of Children," *Environmental Research* 38: 77-95; EPA Technical Review Workgroup for Lead, October 2000, *Review of Human Health Risk Assessment for the Coeur d'Alene Basin*). While some questions remain as to the precise size fraction to use in risk assessment protocols, the studies support an upper size range limit between 150 and 250 um. EPA recommendations currently identify 250 um as a maximum particle size to standardize sieving techniques, but acknowledge that site-specific differences may exist (EPA Technical Review Workgroup for Lead 2000). In the absence of compelling evidence to support modifying the existing protocol, the State of Idaho has decided to continue using the under 175 um size fraction to maintain consistency in risk characterization for the Bunker Hill Box and Coeur d'Alene Basin. EPA has concurred with the State's approach. The 2001 HHRA analysis derived a site-specific dose-response by relating observed blood lead levels to paired soil and dust lead concentrations measurements (TerraGraphics and URS Greiner, 2001, *Human Health Risk Assessment for the Coeur d'Alene Basin Extending from Harrison to Mullan on the Coeur d'Alene River and Tributaries Remedial Investigation/Feasibility Study*). Assuming that any concentration effect due to sieving is proportional, use of a larger particle size (resulting in a lower soil or dust concentration) would have been compensated with an increased dose-response coefficient in the Basin analysis. That is, the per unit effect of soil or dust lead concentration on blood lead levels would have been greater. The reduced concentration of lead would have been interpreted as a higher bioavailability of soil and dust or a higher ingestion rate of soil and dust. EPA and the State believe that the same sieving methodology used historically to characterize soil and dust exposure and to develop the action levels should be used to implement the cleanup.

Bioavailability of Metals (primarily lead)-- The bioavailability of lead was an issue raised in some comments received by EPA on the 2001 Coeur d'Alene Basin Proposed Plan (EPA, 2001, *Coeur d'Alene Basin Proposed Plan*). A detailed explanation of bioavailability and speciation of lead in the Silver Valley is provided in the 2002 Record of Decision for OU 3, Section 3.7.7. The statement in the comment that a lead acetate ingestion study with pigs was utilized to assess bioavailability of lead in the Silver Valley is incorrect. Bioavailability of lead in the Silver Valley was evaluated in the 2001 HHRA based on over 10 years of blood lead measurements paired with soil and house dust lead.

Predictive Analysis -- See response to Comment No. LJ27-8.



to areas accessible by forest roads. Additionally, samples collected for this USGS study were collected in ridgelines and mountain tops which neglect the natural concentrating effects of gravity which will cause the heavy materials to naturally concentrate in draws, canyon bottoms, and in the valleys in districts where naturally occurring minerals are present. The data used to determine background are not representative of the basin background concentrations. – **Underestimate Background**

During assessment of the contended "mining impacts" in the valley, EPA compounded their bad science with techniques that "high-grade" the sample characteristics. It is customary during evaluation to determine economically recoverable metal content in media to utilize a 10-mesh (10 wires per square inch) sieve screen. The screen retains above the mesh any particles larger than the mesh opening. Since metals are primarily concentrated in the fine grained sediments, larger material is discarded and not accounted for in the subsequent analysis. The material passing through the screen becomes the total weight by which the mass of target metals in the sample is divided to determine the ratio of metal content to media total weight. The smaller the screen opening used, the more material that is discarded from the denominator of this ratio. The end result is a lower denominator and thus higher proportion of metal content in the media tested. This skews the data to bias always with a high end result (known as high-grading the sample). EPA utilized an 80-mesh sieve for their study discarding over 8 times more mass from the sample denominator, thus returning a data set that grossly overstates the existing impact and in some cases suggests impacts where none exist. – **Overestimation of Mining Impacts**

1851-4

EPA demonstrates further misapplication of science when they ignore the characteristics of the materials mined in the Silver Valley. The bioavailability of our ore bodies (primarily lead sulfides) is very low. Speciation would resolve this dramatic problem. EPA fails to acknowledge the issue of bioavailability. In studies utilized by EPA to supposedly represent the characteristics of Silver Valley material the science professionals used a lead acetate ingestion study with pigs. Lead acetate is highly soluble, completely disassociates to form ionic species which are drastically different from the perspectives of toxicity, mobility, chemical reactivity and bioavailability. – **Non-representative Data and Inappropriate Application of Study**

EPA utilizes the data they create/collect as inputs into a conceptual model which is not calibrated to the site in any other manner other than the use of these types of input data. The model spits out predictions of where leaching metals are expected to be the highest based on the modeling algorithms. When the input data is skewed the results are model outputs are also similarly affected. – **Highly Suspect Predictive Results Based on Skewed Input Data**

In review of EPA's remedial investigation and focused feasibility study techniques the National Academy of Science stated: The information required to make objective estimate for most of these input values does not exist…"

1851-5

The ROD Amendment calls for construction or installation of features in the stream channels of the South Fork and its tributaries that are adjacent to houses, in and around towns such as Wallace or other development. EPA's Plan does not consider the adverse effects (flooding will occur) of installing revetments, and/or other structural flow inhibitors throughout our streams, creeks and rivers. In 1996-97 a rain on snow event caused a massive amount of flooding during which many of the state owned infrastructures were damaged. The Idaho Department of

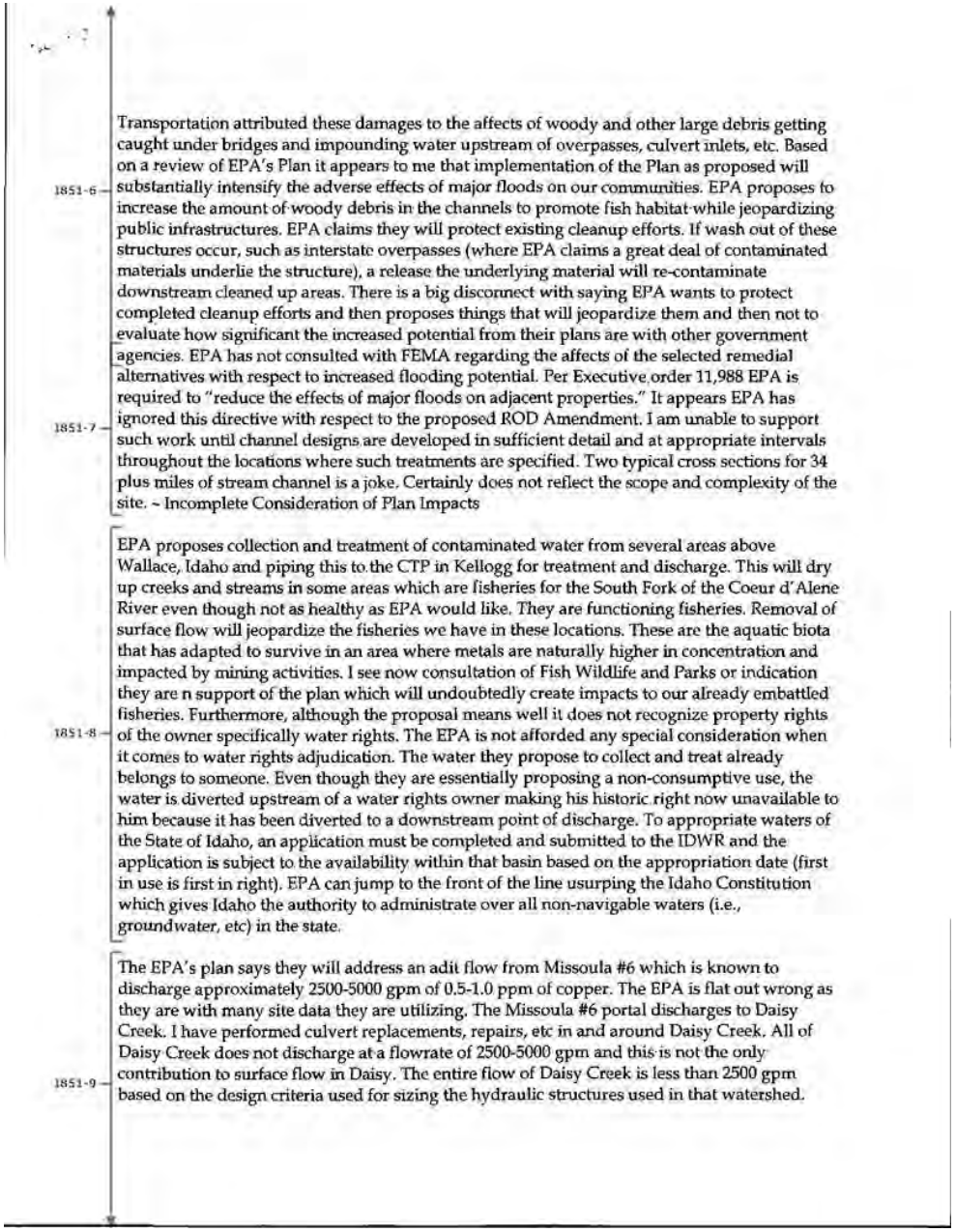
1851-6

Response to comment I851-5

See response to Comment No. LJ27-8.

Response to comment I851-6

Following consideration of comments received on the Proposed Plan and the reduced scope of remedial actions included in the Selected Remedy, EPA further evaluated reaches of the SFCDR designated for stream and riparian actions in the Preferred Alternative. The goal of the evaluation was to identify stream and riparian actions that will be co-located with remedial actions, particularly sediment removal actions, included in the Selected Remedy. Stream and riparian actions will be conducted following remedial actions to stabilize rivers and creeks in the remediated locations. Therefore, the Selected Remedy refers to these actions as stream and riparian "stabilization" actions in the Selected Remedy. During site characterization and remedial design, EPA will continue to coordinate with local communities and flood control authorities, the Basin Commission, the U.S. Army Corp of Engineers, and the Federal Emergency Management Agency. This coordination will ensure that cleanup and stabilization actions do not exacerbate flooding concerns. For additional details on changes to stream and riparian action see the ROD Amendment, Part 2, Section 14.3.



Transportation attributed these damages to the affects of woody and other large debris getting caught under bridges and impounding water upstream of overpasses, culvert inlets, etc. Based on a review of EPA's Plan it appears to me that implementation of the Plan as proposed will
1851-6 substantially intensify the adverse effects of major floods on our communities. EPA proposes to increase the amount of woody debris in the channels to promote fish habitat while jeopardizing public infrastructures. EPA claims they will protect existing cleanup efforts. If wash out of these structures occur, such as interstate overpasses (where EPA claims a great deal of contaminated materials underlie the structure), a release the underlying material will re-contaminate downstream cleaned up areas. There is a big disconnect with saying EPA wants to protect completed cleanup efforts and then proposes things that will jeopardize them and then not to evaluate how significant the increased potential from their plans are with other government agencies. EPA has not consulted with FEMA regarding the affects of the selected remedial alternatives with respect to increased flooding potential. Per Executive order 11,988 EPA is required to "reduce the effects of major floods on adjacent properties." It appears EPA has
1851-7 ignored this directive with respect to the proposed ROD Amendment. I am unable to support such work until channel designs are developed in sufficient detail and at appropriate intervals throughout the locations where such treatments are specified. Two typical cross sections for 34 plus miles of stream channel is a joke. Certainly does not reflect the scope and complexity of the site. ~ Incomplete Consideration of Plan Impacts

EPA proposes collection and treatment of contaminated water from several areas above Wallace, Idaho and piping this to the CTP in Kellogg for treatment and discharge. This will dry up creeks and streams in some areas which are fisheries for the South Fork of the Coeur d'Alene River even though not as healthy as EPA would like. They are functioning fisheries. Removal of surface flow will jeopardize the fisheries we have in these locations. These are the aquatic biota that has adapted to survive in an area where metals are naturally higher in concentration and impacted by mining activities. I see now consultation of Fish Wildlife and Parks or indication they are n support of the plan which will undoubtedly create impacts to our already embattled fisheries. Furthermore, although the proposal means well it does not recognize property rights
1851-8 of the owner specifically water rights. The EPA is not afforded any special consideration when it comes to water rights adjudication. The water they propose to collect and treat already belongs to someone. Even though they are essentially proposing a non-consumptive use, the water is diverted upstream of a water rights owner making his historic right now unavailable to him because it has been diverted to a downstream point of discharge. To appropriate waters of the State of Idaho, an application must be completed and submitted to the IDWR and the application is subject to the availability within that basin based on the appropriation date (first in use is first in right). EPA can jump to the front of the line usurping the Idaho Constitution which gives Idaho the authority to administrate over all non-navigable waters (i.e., groundwater, etc) in the state.

The EPA's plan says they will address an adit flow from Missoula #6 which is known to discharge approximately 2500-5000 gpm of 0.5-1.0 ppm of copper. The EPA is flat out wrong as they are with many site data they are utilizing. The Missoula #6 portal discharges to Daisy Creek. I have performed culvert replacements, repairs, etc in and around Daisy Creek. All of Daisy Creek does not discharge at a flowrate of 2500-5000 gpm and this is not the only
1851-9 contribution to surface flow in Daisy. The entire flow of Daisy Creek is less than 2500 gpm based on the design criteria used for sizing the hydraulic structures used in that watershed.

Response to comment I851-7

As the focus of EPA's work moves from developing the general FFS conceptual designs to the more detailed work of site characterization and remedial design of remedy protection, source control, and water quality projects, EPA will continue to coordinate with local communities and flood control authorities, the Basin Commission, the U.S. Army Corp of Engineers, and the Federal Emergency Management Agency. This coordination will ensure that cleanup actions do not exacerbate flooding concerns along the SFCDR and Pine Creek, and will leverage future work by the various entities involved in SFCDR and Pine Creek activities. Where planning and logical work sequencing allow, EPA will work collaboratively with other entities performing flood control projects to coordinate the cleanup work in a manner that provides joint benefits. In addition, EPA will implement the Upper Basin Selected Remedy in compliance with applicable or relevant and appropriate requirements (ARARs) and will refer to information "to be considered" (TBC), including official documents that address flooding such as Executive Order 11988, Protection of Floodplains. Among other things, Executive Order 11988 requires federal agencies performing actions within a floodplain to minimize potential harm to or within the floodplain and to avoid long- and short-term adverse impacts caused by floodplain modifications. Thus, as cleanup work is carried out within the floodplains of the SFCDR and Pine Creek, efforts will be made to comply with the mandate of that Executive Order.

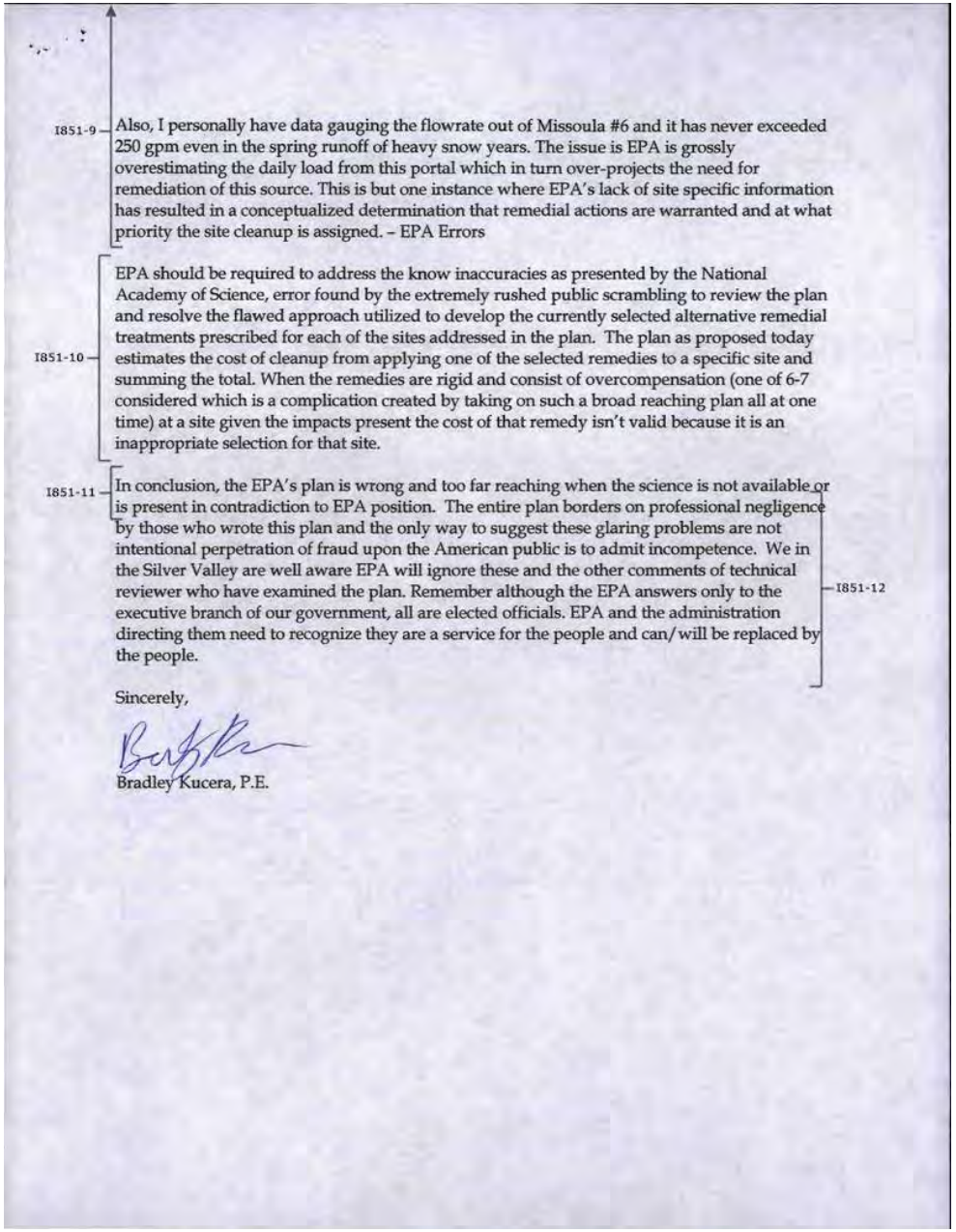
Response to comment I851-8

With regard to stream reduction, see response to Comment No. I54-8. With regard to water rights, see response to Comment No. SA4-12.

Response to comment I851-9

It is unclear what the commenter is referring to. The Proposed Plan did include actions at the Missoula Mine (Site ID MUL103) and these actions did include treatment of an adit discharge for which there were no flow rate data available. At this site, as with others where no flow rate data were available, the flow rate was assumed to be 45 gallons per minute (~0.1 cubic feet per minute). As described in response to Comment No. I822-14, EPA has significantly reduced

the scope of the Selected Remedy. MUL103 (Missoula Mine) is one of the site that is no longer included in the Selected Remedy.



I851-9 Also, I personally have data gauging the flowrate out of Missoula #6 and it has never exceeded 250 gpm even in the spring runoff of heavy snow years. The issue is EPA is grossly overestimating the daily load from this portal which in turn over-projects the need for remediation of this source. This is but one instance where EPA's lack of site specific information has resulted in a conceptualized determination that remedial actions are warranted and at what priority the site cleanup is assigned. – EPA Errors

I851-10 EPA should be required to address the know inaccuracies as presented by the National Academy of Science, error found by the extremely rushed public scrambling to review the plan and resolve the flawed approach utilized to develop the currently selected alternative remedial treatments prescribed for each of the sites addressed in the plan. The plan as proposed today estimates the cost of cleanup from applying one of the selected remedies to a specific site and summing the total. When the remedies are rigid and consist of overcompensation (one of 6-7 considered which is a complication created by taking on such a broad reaching plan all at one time) at a site given the impacts present the cost of that remedy isn't valid because it is an inappropriate selection for that site.

I851-11 In conclusion, the EPA's plan is wrong and too far reaching when the science is not available or is present in contradiction to EPA position. The entire plan borders on professional negligence by those who wrote this plan and the only way to suggest these glaring problems are not intentional perpetration of fraud upon the American public is to admit incompetence. We in the Silver Valley are well aware EPA will ignore these and the other comments of technical reviewer who have examined the plan. Remember although the EPA answers only to the executive branch of our government, all are elected officials. EPA and the administration directing them need to recognize they are a service for the people and can/will be replaced by the people. I851-12

Sincerely,

Bradley Kucera, P.E.

Response to comment I851-10

See responses to Comment Nos. LJ27-8, I54-12 and I295-2.

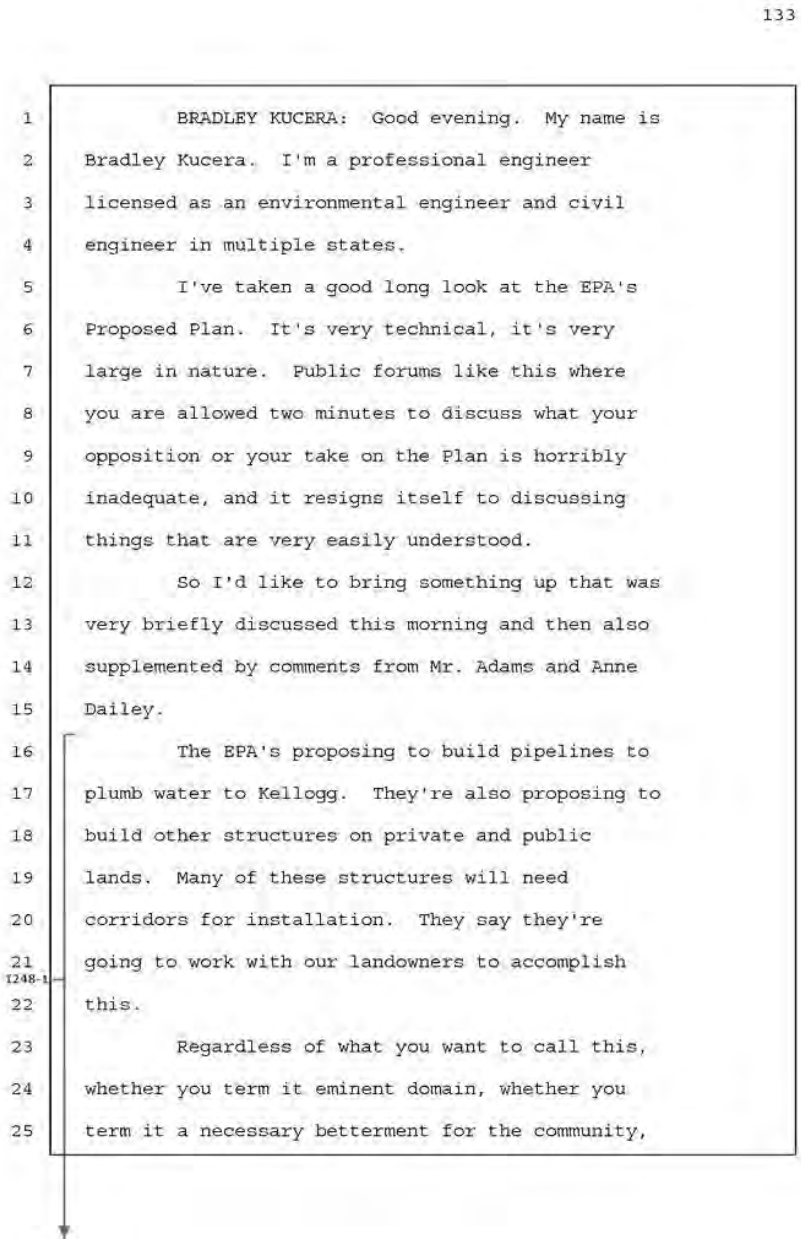
Response to comment I851-11

The Selected Remedy was designed to allow for the emergence of new information and new technologies. As the cleanup is put into action, EPA will use an adaptive management process through which EPA will periodically review new information as the cleanup moves forward. "New information" may include the effectiveness of implemented remedial actions, the fate and transport of contaminants, and review of new technologies that may be applicable to the Upper Basin. Through ongoing adaptive management and the CERCLA Five-Year Review process, EPA anticipates using the information gained to make adjustments to implementation plans and to evaluate and implement new technologies where appropriate.

Response to comment I851-12

Thank you for your comment.

Kucera, Bradley, I248, Letter 610097-43



133

BRADLEY KUCERA: Good evening. My name is Bradley Kucera. I'm a professional engineer licensed as an environmental engineer and civil engineer in multiple states.

I've taken a good long look at the EPA's Proposed Plan. It's very technical, it's very large in nature. Public forums like this where you are allowed two minutes to discuss what your opposition or your take on the Plan is horribly inadequate, and it resigns itself to discussing things that are very easily understood.

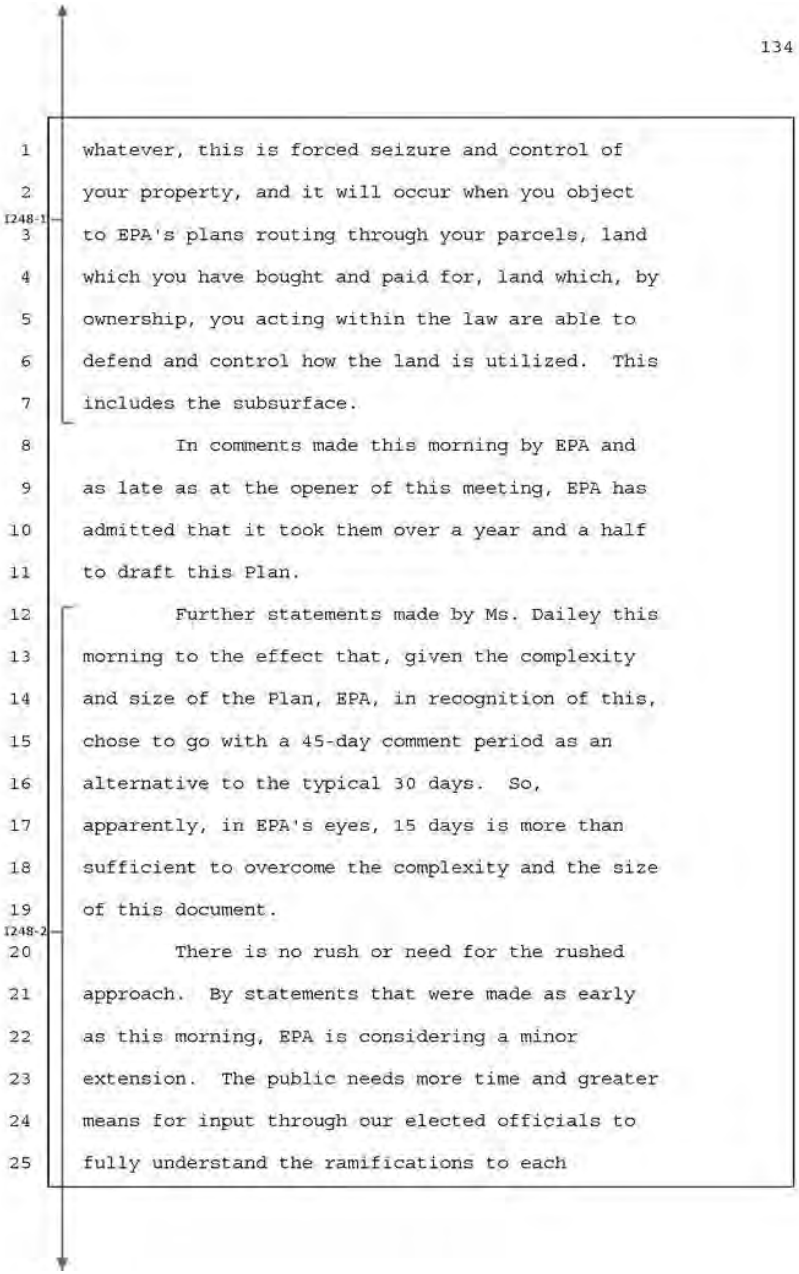
So I'd like to bring something up that was very briefly discussed this morning and then also supplemented by comments from Mr. Adams and Anne Dailey.

The EPA's proposing to build pipelines to plumb water to Kellogg. They're also proposing to build other structures on private and public lands. Many of these structures will need corridors for installation. They say they're going to work with our landowners to accomplish this. I248-1

Regardless of what you want to call this, whether you term it eminent domain, whether you term it a necessary betterment for the community,

Response to comment I248-1

The route of the pipeline conveying water to the CTP is assumed to follow existing rights-of-way along public roads. This will be confirmed during the design phase. By following existing public roads, the impact on landowners and the risk of encountering unexpected contamination is reduced.



134

whatever, this is forced seizure and control of your property, and it will occur when you object I248-1 to EPA's plans routing through your parcels, land which you have bought and paid for, land which, by ownership, you acting within the law are able to defend and control how the land is utilized. This includes the subsurface.

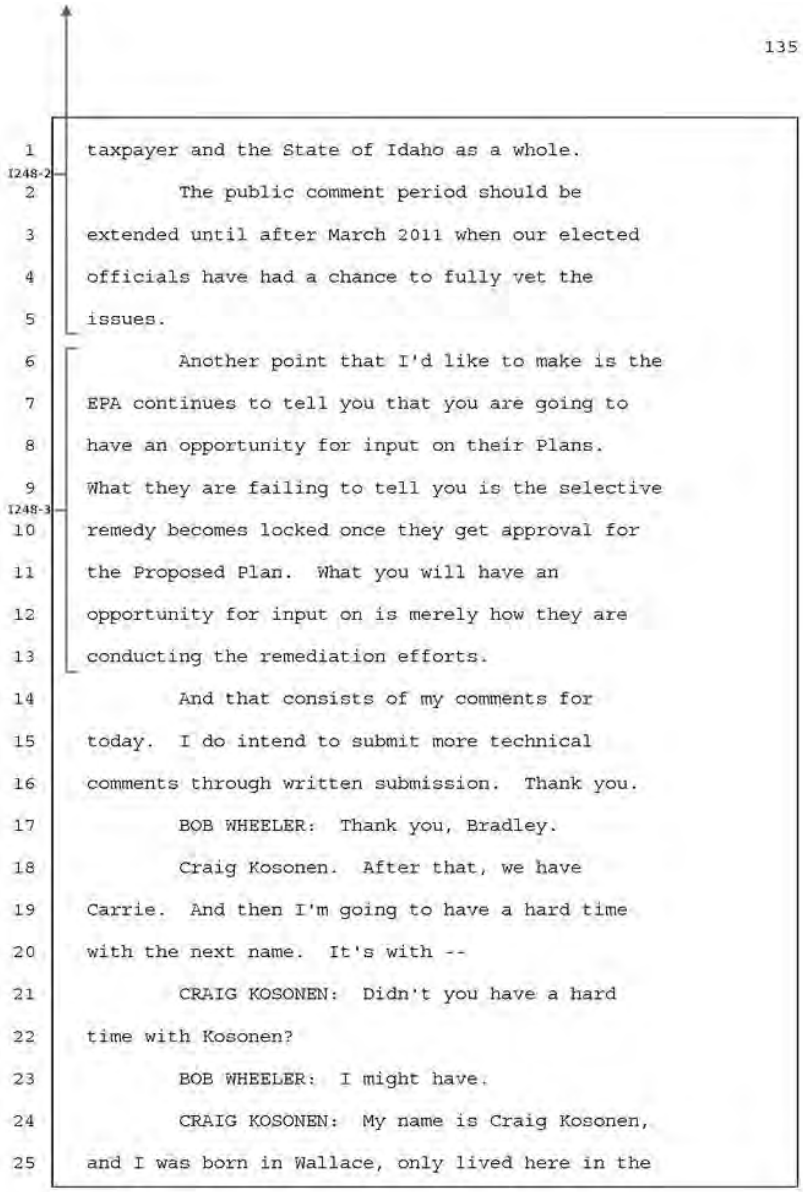
In comments made this morning by EPA and as late as at the opener of this meeting, EPA has admitted that it took them over a year and a half to draft this Plan.

Further statements made by Ms. Dailey this morning to the effect that, given the complexity and size of the Plan, EPA, in recognition of this, chose to go with a 45-day comment period as an alternative to the typical 30 days. So, apparently, in EPA's eyes, 15 days is more than sufficient to overcome the complexity and the size of this document.

I248-2 There is no rush or need for the rushed approach. By statements that were made as early as this morning, EPA is considering a minor extension. The public needs more time and greater means for input through our elected officials to fully understand the ramifications to each

Response to comment I248-2

See response to Comment No. I54-6.



135

taxpayer and the State of Idaho as a whole.

I248-2 The public comment period should be extended until after March 2011 when our elected officials have had a chance to fully vet the issues.

Another point that I'd like to make is the EPA continues to tell you that you are going to have an opportunity for input on their Plans. What they are failing to tell you is the selective

I248-3 remedy becomes locked once they get approval for the Proposed Plan. What you will have an opportunity for input on is merely how they are conducting the remediation efforts.

And that consists of my comments for today. I do intend to submit more technical comments through written submission. Thank you.

BOB WHEELER: Thank you, Bradley.

Craig Kosonen. After that, we have Carrie. And then I'm going to have a hard time with the next name. It's with --

CRAIG KOSONEN: Didn't you have a hard time with Kosonen?

BOB WHEELER: I might have.

CRAIG KOSONEN: My name is Craig Kosonen, and I was born in Wallace, only lived here in the

Response to comment I248-3

See response to Comment No. LJ11-2.

Kucera, Bradley, I276, Letter 616015-40

No comments

around the world and that stigma remains with us as long as EPA remains with us. It makes it very difficult to raise money for projects here. I'm asking, can you see that another century of EPA hegemony here in the Silver Valley? Can you see it for what it truly is aside from it being probably the biggest earth-moving projects since Sahara, [Shiman] and Nagasaki? [Laughter] It's a social experiment to determine just how far we can be pushed away from the representative repubican democracy that we grew up in to determine just how much unelected Seattle [fiad] that we will put up? Governor Otter it's up to you. Please don't sign this thing. Don't sign the document. Do not advocate Idaho's rights as a sovereign state and do not abandon us to a century's occupation by the unelected bureaucrats of Region 10. Do not sign. Oh, EPA will punish Idaho right? They'll take away your DEQ funds. Well who needs DEQ? There's no force or for defense anyway. So please don't go away with your predecessor and I didn't mean now Senator Risch. Don't talk tough up here and then go fold like a cheap suit ten days later in Seattle [laughter]. The executive sovereign state of Idaho is not a gofer for a bloated bureaucracy in Seattle. Please respect that and respect us. Let's put this ROD on ice for 10 years, 20 years. Let's see if nature can't do much less intrusively what they're planning to do with the [you-coulds] and bureaucrats and stuff now. Anyway, thanks for coming.

Barbara Danye: I'm a retired medical professional and I was a public health inspector in California. I have seen no evidence of credible medical evidence that any of the elements the EPA is stating are excessive in our soil or in our water have any continuing health issue in the Silver Valley. Everything has a potential. Everything we breathe, drink and eat has a potential to do us harm. Even EPA-certified water will kill you if you drink too much too fast. I think all of us are tired of our elected officials and the bureaucracy they create, introducing over 2,000 pages of policy and procedure, entering into our lives, health, homes, finances and personal decision making. Please remember that we are the citizens of the valley. We are the state and our nation. God bless America and please defend our constitution.

Bradley Kucera: Thank you very much for being able to speak before the panel. My name is Bradley Kucera. I am a professional engineer, water rights

surveyor, taxpayer and an affected citizen of the Silver Valley. It's an honor to go behind that young lady who's within the health care profession. This is a nice follow up to that. The driving force behind Superfund cleanup costs is quite basically an [absurd] assumption. By assuming extremely unlikely and sometimes physically impossible events will occur at some point in the future, EPA is able to create the impression of risk where no actual harm will occur. EPA generally, based upon these wildly exaggerated risks, given the increased cancer risk of one in 10,000 will undertake enormous cleanup costs. When you consider the normal rate of total cancer occurrence in the US which is approximately one in four, expending $1.34 billion to reduce the cancer risk by less than 1/100 of 1%is absolutely absurd, nothing short of irresponsible. I am offended as a member of the scientific community this is could ever be mistaken science.

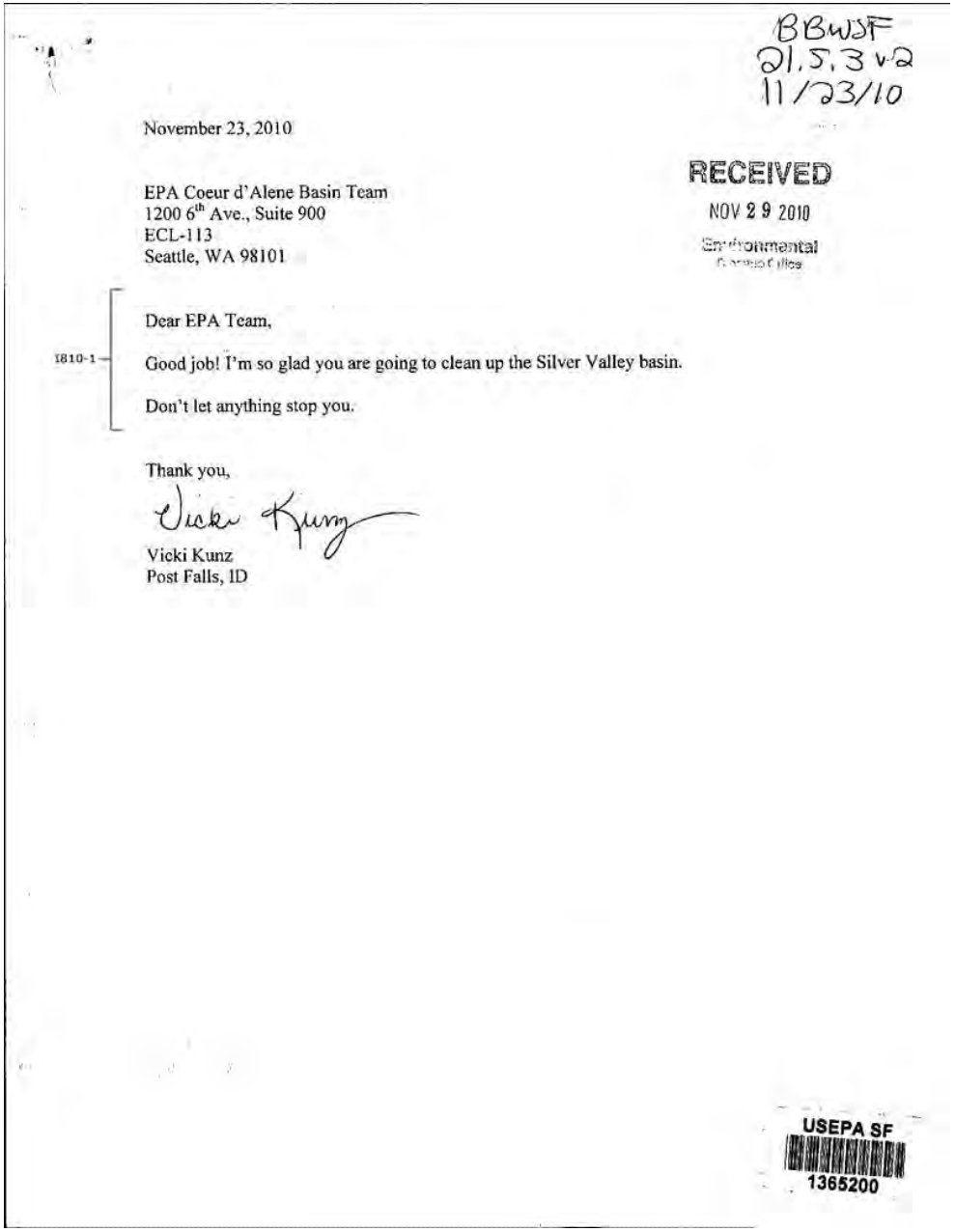
I276-1

Mary Ruth Dilling: My name is Mary Ruth Dilling. I feel the EPA continues to stick its nose in our business and it's time for the federal government to leave our area and go home. After the legal issues were handled in the past, the federal court said there had to be an ending if this plan is approved. Where is the ending? I know Wednesday night I saw the minutes from the Coeur d'Alene Basin board meeting and they were talking about in ten years working on the Coeur d'Alene River. Where does it stop? Another point as I was speaking to one of the project managers at the open house, he was explaining that they were draining the ground water. Okay, I know an old tried and true method of cleaning water is to drain it through sand and rocks. So if they're not going to worry about the surface water but the ground water, is the testing done on the ground water? The other night it was talking about work to be redone. Why? Because Mother Nature has torn away what EPA has done. Look at all this snow and snowmelt. Mother Nature is not going to be stopped. Does this mean that we continually put money into a project that has to be done over and over? I know of one EPA worker talking to another former one and said they needed to keep up the lead testing to keep the money coming in, but the results were all in the normal range and they had a problem with that. Listen, the EPA has already done enough damage. It's time for them to return home. Let's take care of ourselves.

Response to comment I276-1

Regarding human health risks, see response to Comment No. I295-1. The FFS, Proposed Plan and ROD Amendment were developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA.

Kunz, Vicki, I810, Letter 1365200



BBWSF
21.5.3 v.2
11/23/10

November 23, 2010

RECEIVED
NOV 29 2010
Environmental
Comment Office

EPA Coeur d'Alene Basin Team
1200 6th Ave., Suite 900
ECL-113
Seattle, WA 98101

Dear EPA Team,

I810-1 Good job! I'm so glad you are going to clean up the Silver Valley basin.

Don't let anything stop you.

Thank you,

Vicki Kunz

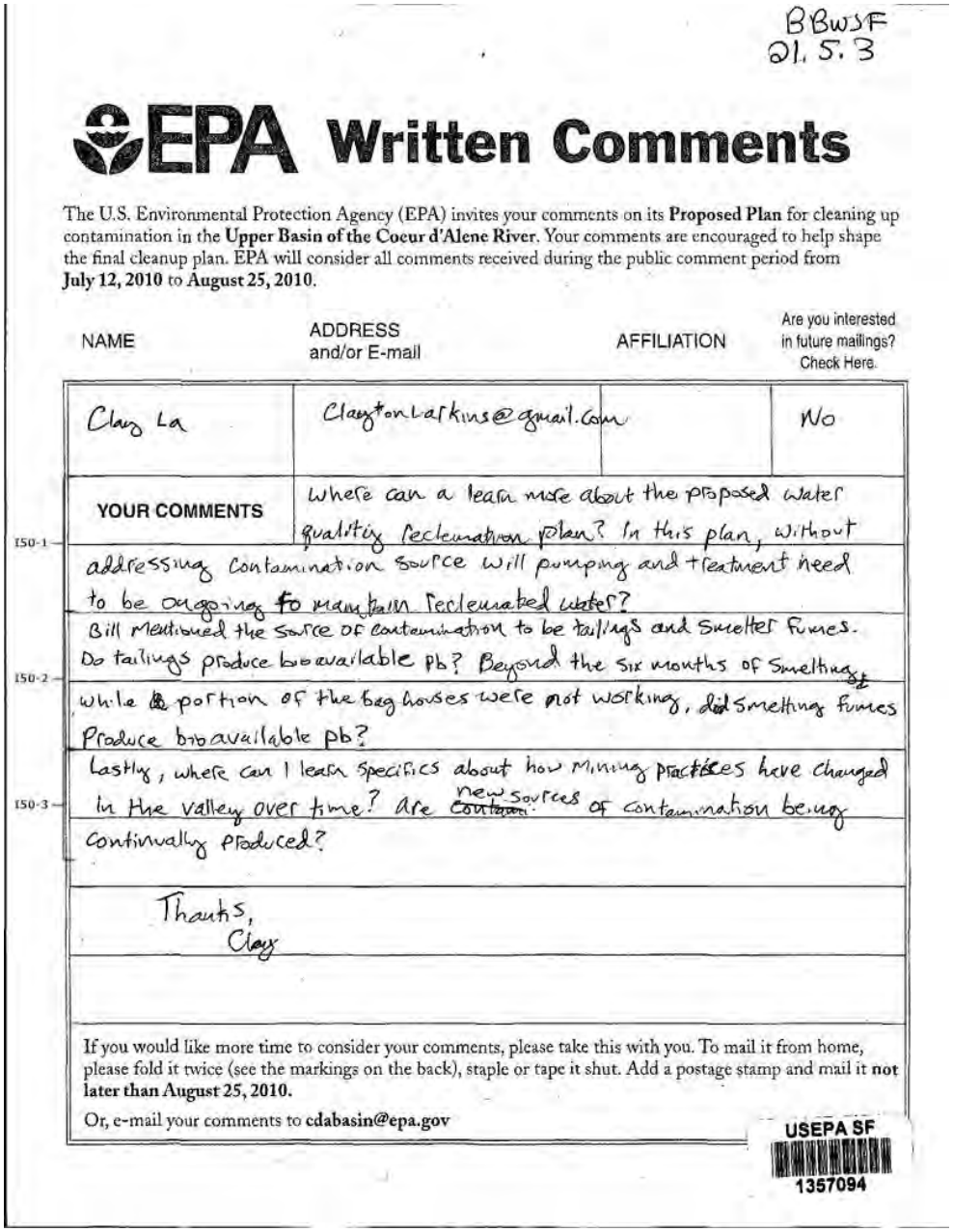
Vicki Kunz
Post Falls, ID

USEPA SF
1365200

Response to comment I810-1

Thank you for your comment.

La, Clay, I50, Letter 1357094



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Clay La	ClaytonLarkins@gmail.com		No

YOUR COMMENTS

I50-1 Where can a learn more about the proposed water quality reclamation plan? In this plan, without addressing contamination source will pumping and treatment need to be ongoing to maintain reclaimed water?

I50-2 Bill mentioned the source of contamination to be tailings and smelter fumes. Do tailings produce bioavailable pb? Beyond the six months of smelting while a portion of the bag houses were not working, did smelting fumes produce bioavailable pb?

I50-3 Lastly, where can I learn specifics about how mining practices have changed in the valley over time? Are ~~contam~~ new sources of contamination being continually produced?

Thanks,
Clay

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357094

Response to comment I50-1

EPA interprets this comment to be referring to the water treatment component of the Selected Remedy. The development of remedial alternatives, including application of water treatment and source control actions, is addressed in Section 6 of the FFS (EPA, 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). Water treatment is a key part of the Selected Remedy because it will (1) address subsurface materials too deep or impractical to be removed, (2) generally provide a high degree of metals load reduction for a relatively low cost, and (3) achieve immediate improvements to water quality. Given the widespread nature of the contamination and extent of groundwater contamination it is likely that collection and treatment of water will need to occur for an extended period of time.

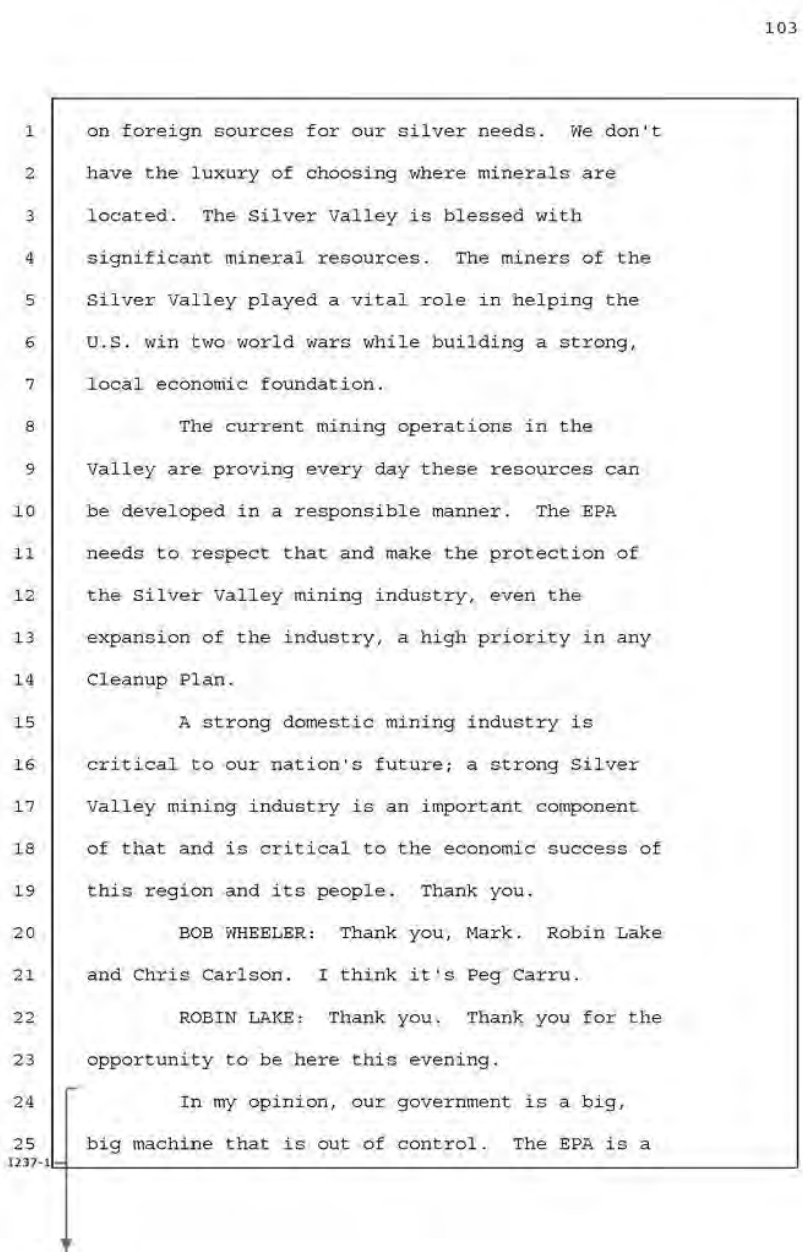
Response to comment I50-2

Yes, both tailings and smelter fumes produce lead that may be bioavailable to varying degrees.

Response to comment I50-3

The Selected Remedy addresses historical mining-related contamination. The vast majority of the historical mining contamination was generated by mining practices that are no longer used by the industry. Current mining activities are regulated by both federal and state authorities outside of the CERCLA process. For example EPA regulates current mining through the Clean Water Act permitting process.

Lake, Robin, I237, Letter 610097-32



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on foreign sources for our silver needs. We don't have the luxury of choosing where minerals are located. The Silver Valley is blessed with significant mineral resources. The miners of the Silver Valley played a vital role in helping the U.S. win two world wars while building a strong, local economic foundation.

The current mining operations in the Valley are proving every day these resources can be developed in a responsible manner. The EPA needs to respect that and make the protection of the Silver Valley mining industry, even the expansion of the industry, a high priority in any Cleanup Plan.

A strong domestic mining industry is critical to our nation's future; a strong Silver Valley mining industry is an important component of that and is critical to the economic success of this region and its people. Thank you.

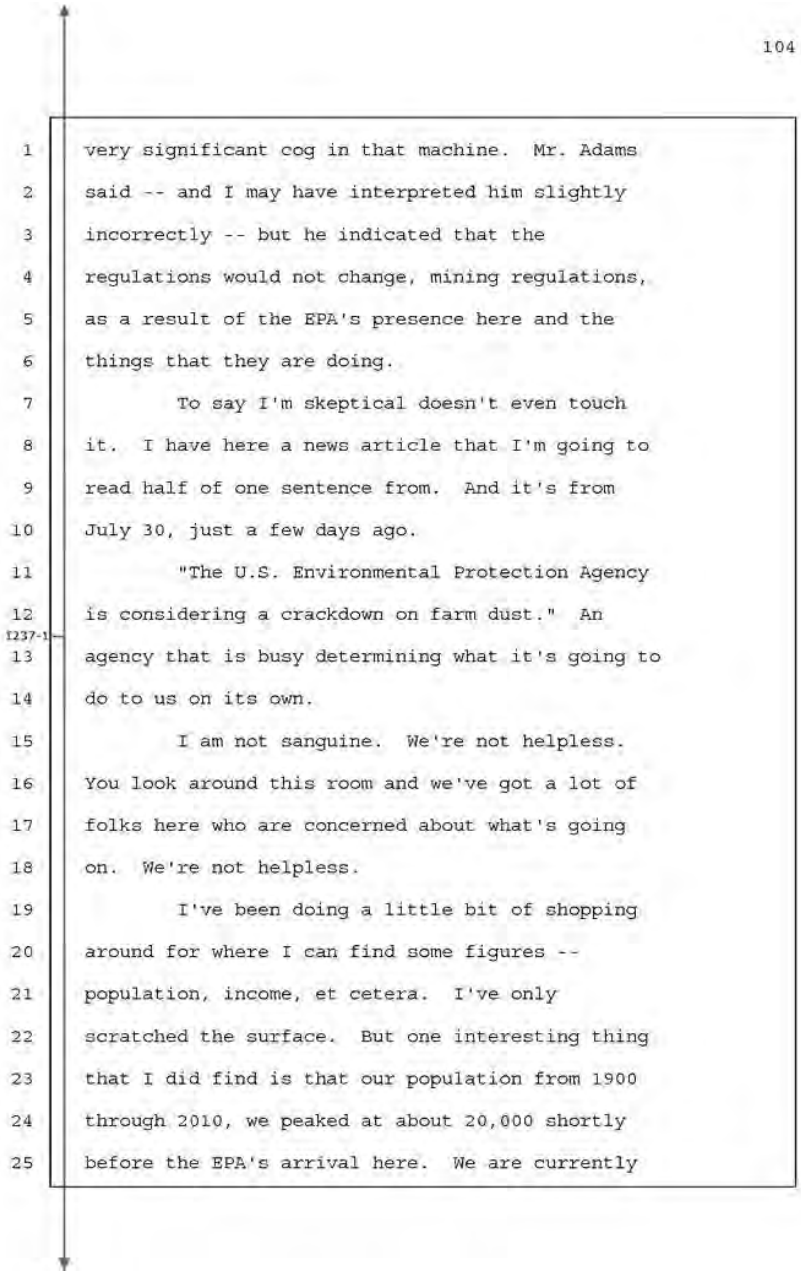
BOB WHEELER: Thank you, Mark. Robin Lake and Chris Carlson. I think it's Peg Carru.

ROBIN LAKE: Thank you. Thank you for the opportunity to be here this evening.

In my opinion, our government is a big, big machine that is out of control. The EPA is a

I237-1

Response to comment I237-1
Comment noted.



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very significant cog in that machine. Mr. Adams said -- and I may have interpreted him slightly incorrectly -- but he indicated that the regulations would not change, mining regulations, as a result of the EPA's presence here and the things that they are doing.

To say I'm skeptical doesn't even touch it. I have here a news article that I'm going to read half of one sentence from. And it's from July 30, just a few days ago.

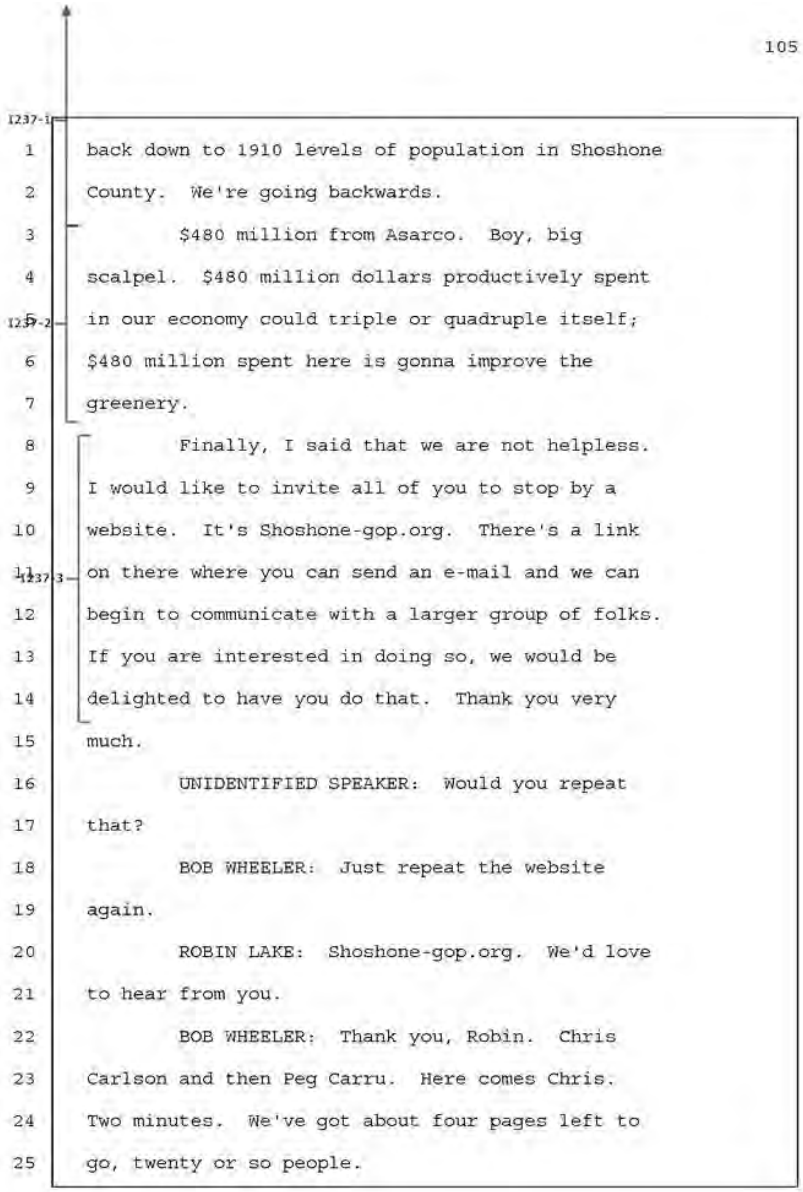
"The U.S. Environmental Protection Agency is considering a crackdown on farm dust." An agency that is busy determining what it's going to do to us on its own.

I am not sanguine. We're not helpless. You look around this room and we've got a lot of folks here who are concerned about what's going on. We're not helpless.

I've been doing a little bit of shopping around for where I can find some figures -- population, income, et cetera. I've only scratched the surface. But one interesting thing that I did find is that our population from 1900 through 2010, we peaked at about 20,000 shortly before the EPA's arrival here. We are currently

1237-1

No comments



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I237-1

back down to 1910 levels of population in Shoshone County. We're going backwards.

$480 million from Asarco. Boy, big scalpel. $480 million dollars productively spent in our economy could triple or quadruple itself; I237-2 $480 million spent here is gonna improve the greenery.

Finally, I said that we are not helpless. I would like to invite all of you to stop by a website. It's Shoshone-gop.org. There's a link I237-3 on there where you can send an e-mail and we can begin to communicate with a larger group of folks. If you are interested in doing so, we would be delighted to have you do that. Thank you very much.

UNIDENTIFIED SPEAKER: Would you repeat that?

BOB WHEELER: Just repeat the website again.

ROBIN LAKE: Shoshone-gop.org. We'd love to hear from you.

BOB WHEELER: Thank you, Robin. Chris Carlson and then Peg Carru. Here comes Chris. Two minutes. We've got about four pages left to go, twenty or so people.

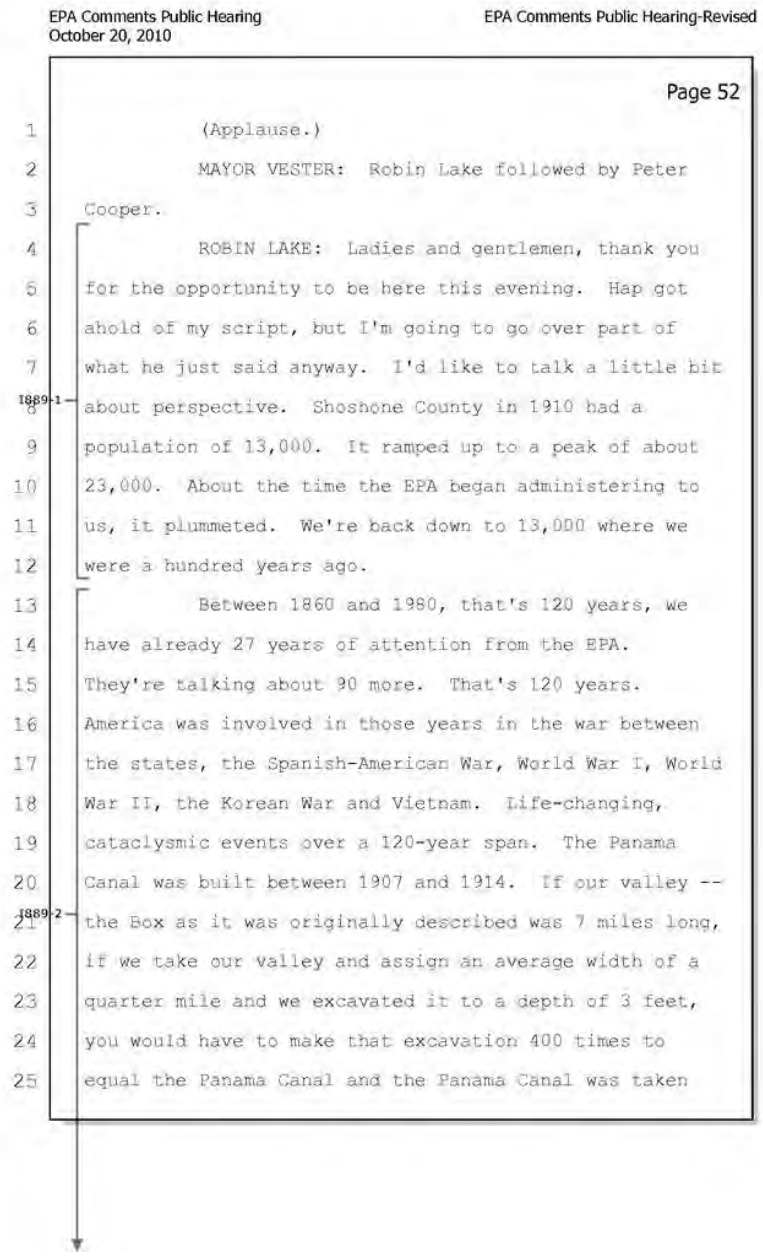
Response to comment I237-2

Regarding the cost and funding of the cleanup, see response to Comment I58-2.

Response to comment I237-3

Comment noted.

Lake, Robin, I889, Letter 619651-20



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

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(Applause.)

MAYOR VESTER: Robin Lake followed by Peter Cooper.

ROBIN LAKE: Ladies and gentlemen, thank you for the opportunity to be here this evening. Hap got ahold of my script, but I'm going to go over part of what he just said anyway. I'd like to talk a little bit about perspective. Shoshone County in 1910 had a population of 13,000. It ramped up to a peak of about 23,000. About the time the EPA began administering to us, it plummeted. We're back down to 13,000 where we were a hundred years ago. I889-1

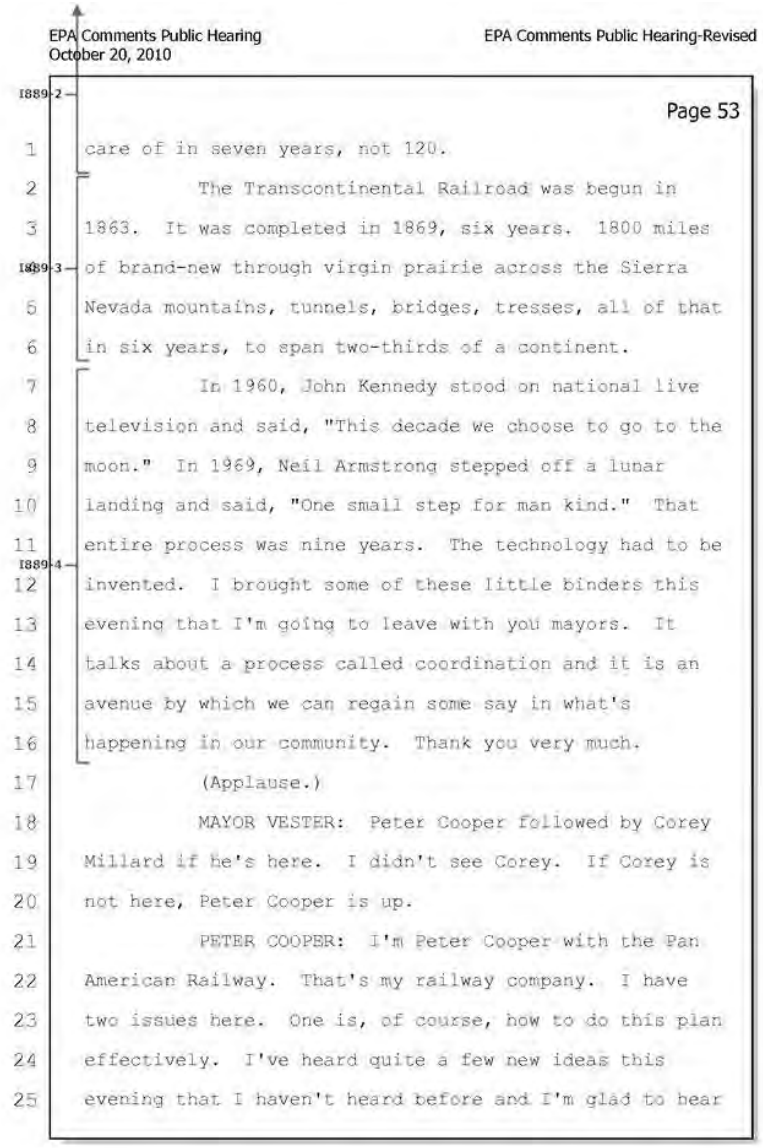
Between 1860 and 1980, that's 120 years, we have already 27 years of attention from the EPA. They're talking about 90 more. That's 120 years. America was involved in those years in the war between the states, the Spanish-American War, World War I, World War II, the Korean War and Vietnam. Life-changing, cataclysmic events over a 120-year span. The Panama Canal was built between 1907 and 1914. If our valley -- the Box as it was originally described was 7 miles long, if we take our valley and assign an average width of a quarter mile and we excavated it to a depth of 3 feet, you would have to make that excavation 400 times to equal the Panama Canal and the Panama Canal was taken I889-2

Response to comment I889-1

Thank you for your comment.

Response to comment I889-2

Thank you for your comment.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

I889-2

Page 53

care of in seven years, not 120.

The Transcontinental Railroad was begun in 1863. It was completed in 1869, six years. 1800 miles

I889-3

of brand-new through virgin prairie across the Sierra Nevada mountains, tunnels, bridges, tresses, all of that in six years, to span two-thirds of a continent.

In 1960, John Kennedy stood on national live television and said, "This decade we choose to go to the moon." In 1969, Neil Armstrong stepped off a lunar landing and said, "One small step for man kind." That entire process was nine years. The technology had to be

I889-4

invented. I brought some of these little binders this evening that I'm going to leave with you mayors. It talks about a process called coordination and it is an avenue by which we can regain some say in what's happening in our community. Thank you very much.

(Applause.)

MAYOR VESTER: Peter Cooper followed by Corey Millard if he's here. I didn't see Corey. If Corey is not here, Peter Cooper is up.

PETER COOPER: I'm Peter Cooper with the Pan American Railway. That's my railway company. I have two issues here. One is, of course, how to do this plan effectively. I've heard quite a few new ideas this evening that I haven't heard before and I'm glad to hear

Response to comment I889-3

Thank you for your comment.

Response to comment I889-4

Thank you for your comment.

Lambert, Troy, I670, Letter 618280

Public Comment
Troy L. Lambert
to:
CDABasin, adams.bill
11/23/2010 06:13 AM
Cc:
"Amy Wheeless", Andy.Mork, "Denna Grangaard", "Jerry K. Boyd", "Nick Rotunno", "Pamela Randel", "Ric Clark", "William Lambert"
Show Details

Public Comment On the EPA Proposed Plan

Region 10 Issued July 12, 2010

by Troy L. Lambert

Created November 20, 2010

(208)421-6068

troylambertwrites@live.com

Opposition Points to the Proposed ROD Amendment

The plan cost seems contrived.

Using a simple mathematical formula, and factoring the amount of the ASARCO settlement, we can arrive at the estimated cost of the proposed plan, without factoring in cost of individual sites. ASARCO is responsible for 22% of cleanup costs, and Hecla 30%, decreed by court judgments against them. The ASARCO settlement was for $494 million. The formula begins:

I670-1

- 22%(x)=$494 million. x then equals $2.245 billion and some change, which should equal the total amount of the cleanup if ASARCO is indeed responsible for this percentage.
- 30% of 2.245 billion gives us $673 million dollars, Hecla's share of the $2.245 billion total cleanup costs.
- $494 billion plus $673 million gives us $1.167 billion. With a few simple additions this gives us $1.3 billion, the proposed cost for the proposed cleanup plan.

And so far, we have not looked at a single site, or a single proposed action, we have simply done some math.

The cost of cleaning up specific sites is not data based

There are many objections to specific sites, and whether they should or should not be included in the plan. There has been much research done on this, and others have addressed these sites in their public comments. It is not necessary to duplicate their work, instead I would like to point out that there are many sites included in the proposed plan that the EPA has not visited, and has not removed samples from for analysis. A good example of this is the Copper King mine, MUL052, in Appendix D.

I670-2

First, some of the sites have not been visited by the EPA because it is impossible or quite difficult to do so via

618280

Response to comment I670-1

The costs identified in Proposed Plan were based on a development of a comprehensive remedy for the Upper Basin in order to achieve water quality goals for the entire Upper Basin. This information was developed from a predictive analysis discussed in Comment 135-11. Also see responses to Comment Nos. I58-2 and I295-3.

Response to comment I670-2

See response to Comment No. I822-14 regarding prioritizing sites for implementation. The Copper King Mine (MUL052) is included in the Selected Remedy. EPA will conduct additional site characterization and pre-design work. If this site characterization finds that risks do not exist then EPA will not implement remedial actions at this site. In addition EPA is also planning on conducting ongoing site characterization as was conducted in the summer 2011 at sites both within the selected remedy and those removed in order to insure that the cleanup work is focused on those sites which have the most significant impact on human health and the environment.

Page 2 of 5

I670-2 vehicular transport. Therefore, the impact of these sites on water quality and mineral loading of the South Fork has not been determined, because no testing has been done.

I670-3
- Including these sites in the plan is at best suspect. Also, it is impossible without accurate data about mineral content of waste rock, if any, and the leeching of these mine wastes into water that flows into the South Fork, to estimate the cost of cleaning up such waste piles. The plan bases these costs on production data supplied to the EPA years ago, and assumes that if a certain amount of ore was processed a certain amount of waste will be present, an assumption that may or may not prove to be valid upon actual investigation of the site.

I670-4
- The sites that are not accessible by road may or may not include the cost and economic impact of creating a road to reach the site. There have been no feasibility studies done to determine if such a road would be possible or beneficial. The cost of this construction could cause the plan to run over budget by millions of dollars. Not to mention private property issues, and lawsuits that might be brought by recreation groups and/or environmental groups opposed to the impact a road into such areas might have.

The plan is too lengthy for cost models to be accurate.

I670-5 A fifty to ninety year plan is fiscally impractical, because there are factors it cannot possibly foresee or accurately forecast. Even a five to ten year plan can be risky in this area.

I670-6
- We cannot, with the current speed of technological advance, foresee the more practical and economical processes that may developed to aid in the cleanup. For instance research into chemical and biological means such as those used in the Gulf of Mexico during the BP oil crisis could not have been conceived of ten years ago, and although still an ecological nightmare, the effects of the BP crisis could have been much worse, and the costs much higher without these technologies.

I670-7
- Although we see an increase in metal prices, and demand for industrial products derived from minerals mined here in the Silver Valley, we cannot with any accuracy forecast future demand, and future technology for the extraction of these products. If mine waste is replete with these minerals, it may become in the near future practical to extract these minerals for industrial use, instead of moving the tainted soils to a repository. Physical cleaning of the contaminated soil may become economically and technically feasible within the next half century, thus making much of the "work" of the proposed plan unnecessary.

I670-8
- We cannot forecast inflation and future labor costs with any accuracy. Contract labor could become scarce in the event of another world conflict, such as the shortage of labor in 1942 at the beginning of WWI. Or unemployment could sky rocket to near depression levels of 30% and labor could be plentiful and cheap. Automation technology could greatly speed the process of cleanup, and make techniques we use now obsolete. Multiple technological and economic factors cannot be predicted.

These factors and many others make the plan fiscally impossible to implement as it now stands.

The plan fails to address flooding and other practical issues.

I670-9 Although the EPA has pushed off the flooding issue to the Department of the Interior and FEMA, it would be more practical for these studies to be done before the plan is approved. There are both fiscal and technical

Response to comment I670-3

See response to Comment No. I822-14.

Response to comment I670-4

An evaluation to include access road costs for individual sites was conducted during development of the FFS. However, development of these costs required detailed site-specific information that was not available. Even though limited site-specific information precluded development of site-specific access road costs, access road costs were accounted for as 15 percent of the direct capital costs. Before cleanup takes place, EPA will evaluate and address private property issues and access road feasibility and construction during the pre-design process.

Response to comment I670-5

See response to Comment No. I58-1.

Response to comment I670-6

See response to Comment No. I58-1 regarding the duration of cleanup. EPA plans to implement the Selected Remedy using an adaptive management approach. Adaptive management is a critical component of the Selected Remedy because it is not possible for physical and chemical conditions to be fully defined and known for this large and complex area. Adaptive management considers uncertainty, monitors and evaluates the effectiveness of the remedial actions and cleanup technologies, and then incorporates the "lessons learned" such that uncertainty is reduced for future actions as the cleanup work progresses towards achievement of the overall cleanup goals.

Response to comment I670-7

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. As documented in the ROD Amendment, sufficient information exists to support the Selected Remedy. However, insufficient information exists to characterize all the specific sources of metals contamination that affect the SFCDR, streams, and floodplains in some areas of the Upper Basin. Before the cleanup takes place, many pre-design activities will take place at specific sites. EPA agrees that technologies can change over time and will always be looking for opportunities to adapt the

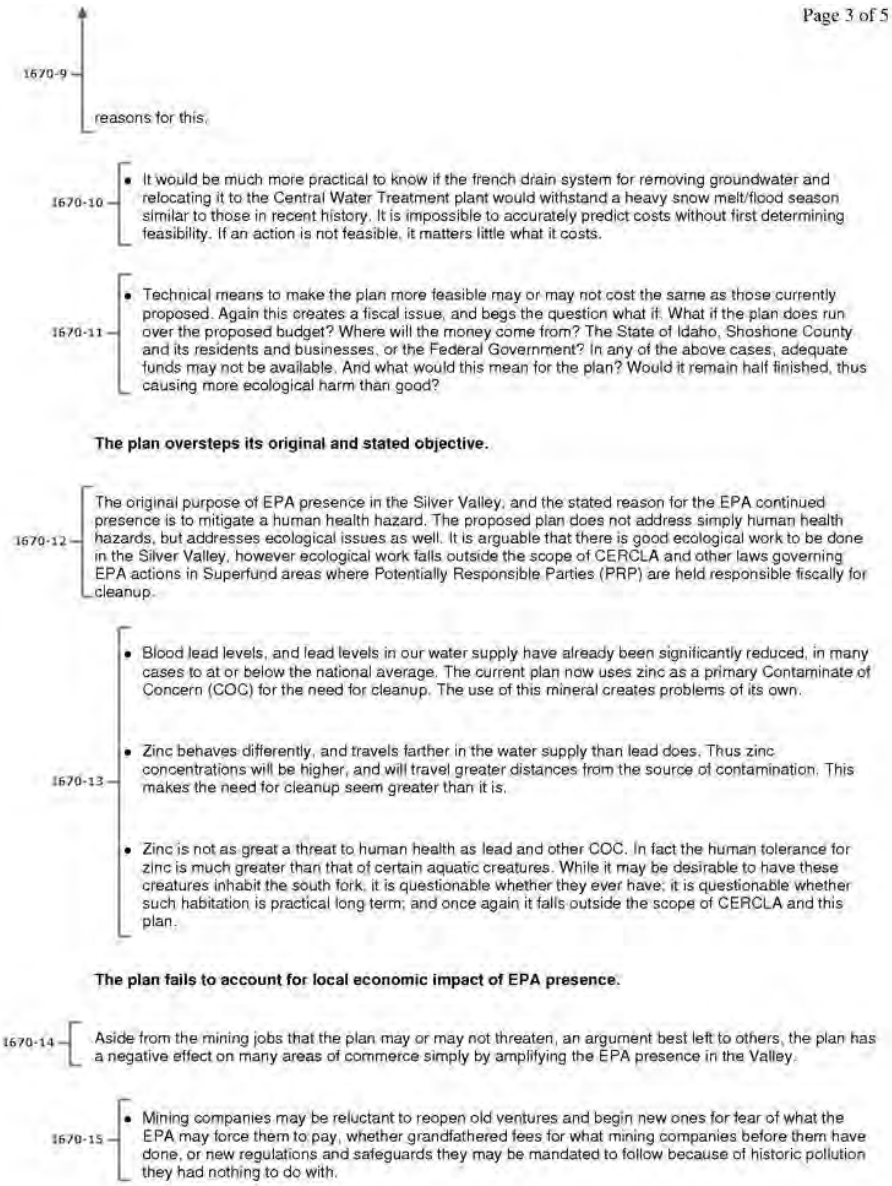
cleanup approach to make use of any new technologies that may be appropriate to address the risks.

Response to comment I670-8

See response to Comment No. I54-12.

Response to comment I670-9

See response to Comment No. LJ36-3.



Page 3 of 5

1670-9 reasons for this.

1670-10 • It would be much more practical to know if the french drain system for removing groundwater and relocating it to the Central Water Treatment plant would withstand a heavy snow melt/flood season similar to those in recent history. It is impossible to accurately predict costs without first determining feasibility. If an action is not feasible, it matters little what it costs.

1670-11 • Technical means to make the plan more feasible may or may not cost the same as those currently proposed. Again this creates a fiscal issue, and begs the question what if. What if the plan does run over the proposed budget? Where will the money come from? The State of Idaho, Shoshone County and its residents and businesses, or the Federal Government? In any of the above cases, adequate funds may not be available. And what would this mean for the plan? Would it remain half finished, thus causing more ecological harm than good?

The plan oversteps its original and stated objective.

1670-12 The original purpose of EPA presence in the Silver Valley, and the stated reason for the EPA continued presence is to mitigate a human health hazard. The proposed plan does not address simply human health hazards, but addresses ecological issues as well. It is arguable that there is good ecological work to be done in the Silver Valley, however ecological work falls outside the scope of CERCLA and other laws governing EPA actions in Superfund areas where Potentially Responsible Parties (PRP) are held responsible fiscally for cleanup.

1670-13 • Blood lead levels, and lead levels in our water supply have already been significantly reduced, in many cases to at or below the national average. The current plan now uses zinc as a primary Contaminate of Concern (COC) for the need for cleanup. The use of this mineral creates problems of its own.

• Zinc behaves differently, and travels farther in the water supply than lead does. Thus zinc concentrations will be higher, and will travel greater distances from the source of contamination. This makes the need for cleanup seem greater than it is.

• Zinc is not as great a threat to human health as lead and other COC. In fact the human tolerance for zinc is much greater than that of certain aquatic creatures. While it may be desirable to have these creatures inhabit the south fork, it is questionable whether they ever have; it is questionable whether such habitation is practical long term; and once again it falls outside the scope of CERCLA and this plan.

The plan fails to account for local economic impact of EPA presence.

1670-14 Aside from the mining jobs that the plan may or may not threaten, an argument best left to others, the plan has a negative effect on many areas of commerce simply by amplifying the EPA presence in the Valley.

1670-15 • Mining companies may be reluctant to reopen old ventures and begin new ones for fear of what the EPA may force them to pay, whether grandfathered fees for what mining companies before them have done, or new regulations and safeguards they may be mandated to follow because of historic pollution they had nothing to do with.

Response to comment I670-10

As described in the response to Comment No. I58-1, the scope of the Selected Remedy has been significantly reduced from that of the Preferred Alternative of the Proposed Plan. Nonetheless, French drains are a well established, feasible technology.

Response to comment I670-11

As described in the ROD Amendment, the Selected Remedy has a reduced scope and cost from that of the Preferred Alternative identified in the Proposed Plan. Regarding the cost and funding of the Selected Remedy, see ROD Amendment, Part 3, Section 3.9. Furthermore, as described in the ROD Amendment, Part 2, Section 12.3, EPA will be implementing prioritized actions within the remedy in an incremental manner, not all at once. Consequently, the prospect of an unfinished remedy that results in "causing more harm than good" is unrealistic. Also see response to comment No. 1295-3.

Response to comment I670-12

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to both human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

Response to comment I670-13

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. The contaminants of concern for the Upper Basin include arsenic, cadmium, lead, mercury, and zinc. Dissolved zinc is considered indicator for dissolved metals in surface water and groundwater because it is the most ubiquitous of the metals; it occurs at the highest concentrations; it is relatively mobile compared to other metals; and dissolved metals appear well correlated with dissolved zinc throughout the Upper Basin. Zinc is widely distributed in the environment, and SFCDR site-specific ambient

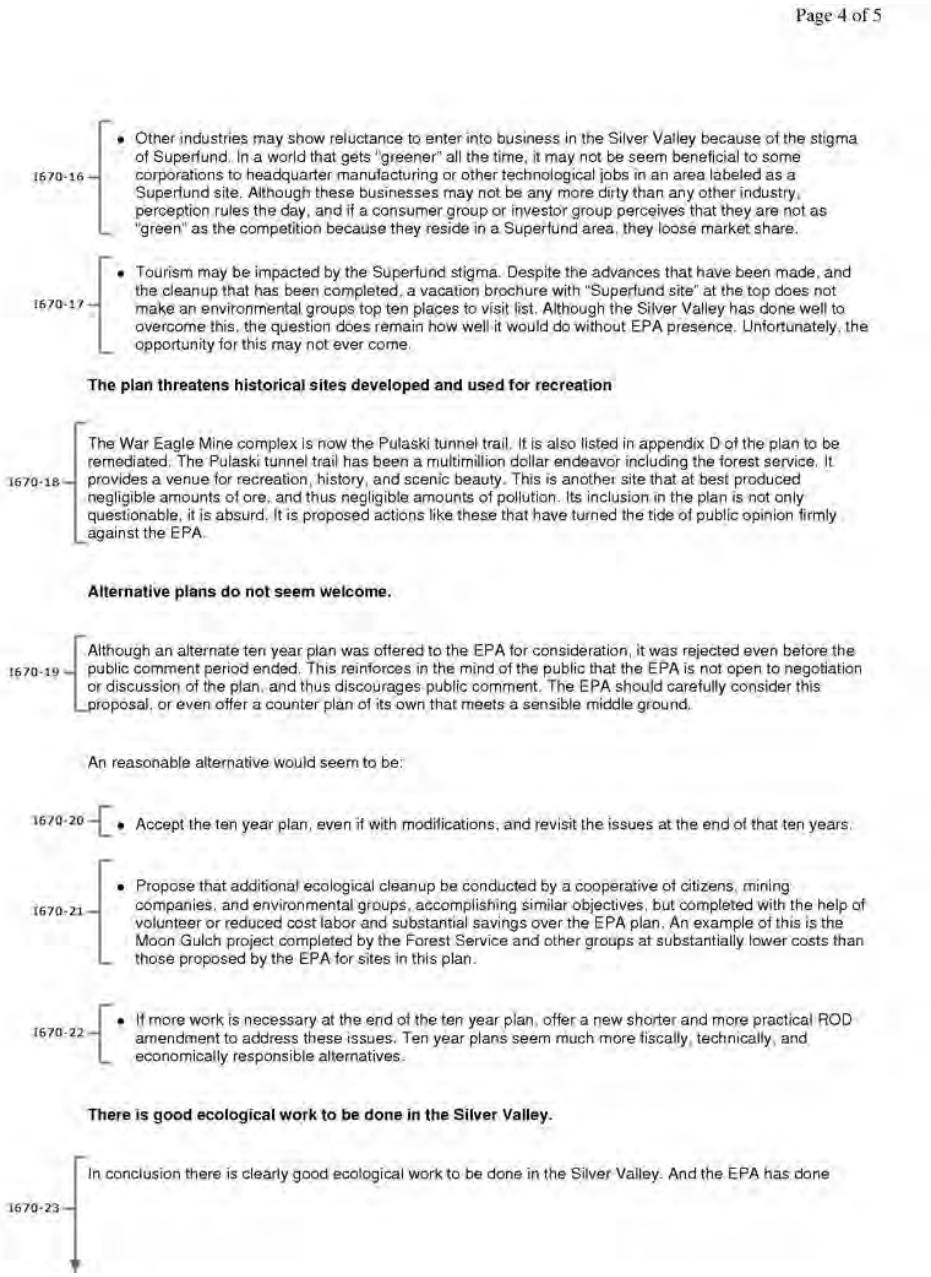
water quality criterion or criteria (AWQC) for zinc are exceeded throughout the Upper Basin, generally at levels toxic to aquatic organisms.

Response to comment I670-14

See responses to Comment Nos. I58-5 and I54-2.

Response to comment I670-15

See response to Comment No. I58-5.



Page 4 of 5

I670-16 • Other industries may show reluctance to enter into business in the Silver Valley because of the stigma of Superfund. In a world that gets "greener" all the time, it may not be seem beneficial to some corporations to headquarter manufacturing or other technological jobs in an area labeled as a Superfund site. Although these businesses may not be any more dirty than any other industry, perception rules the day, and if a consumer group or investor group perceives that they are not as "green" as the competition because they reside in a Superfund area, they loose market share.

I670-17 • Tourism may be impacted by the Superfund stigma. Despite the advances that have been made, and the cleanup that has been completed, a vacation brochure with "Superfund site" at the top does not make an environmental groups top ten places to visit list. Although the Silver Valley has done well to overcome this, the question does remain how well it would do without EPA presence. Unfortunately, the opportunity for this may not ever come.

The plan threatens historical sites developed and used for recreation

I670-18 The War Eagle Mine complex is now the Pulaski tunnel trail. It is also listed in appendix D of the plan to be remediated. The Pulaski tunnel trail has been a multimillion dollar endeavor including the forest service. It provides a venue for recreation, history, and scenic beauty. This is another site that at best produced negligible amounts of ore, and thus negligible amounts of pollution. Its inclusion in the plan is not only questionable, it is absurd. It is proposed actions like these that have turned the tide of public opinion firmly against the EPA.

Alternative plans do not seem welcome.

I670-19 Although an alternate ten year plan was offered to the EPA for consideration, it was rejected even before the public comment period ended. This reinforces in the mind of the public that the EPA is not open to negotiation or discussion of the plan, and thus discourages public comment. The EPA should carefully consider this proposal, or even offer a counter plan of its own that meets a sensible middle ground.

An reasonable alternative would seem to be:

I670-20 • Accept the ten year plan, even if with modifications, and revisit the issues at the end of that ten years.

I670-21 • Propose that additional ecological cleanup be conducted by a cooperative of citizens, mining companies, and environmental groups, accomplishing similar objectives, but completed with the help of volunteer or reduced cost labor and substantial savings over the EPA plan. An example of this is the Moon Gulch project completed by the Forest Service and other groups at substantially lower costs than those proposed by the EPA for sites in this plan.

I670-22 • If more work is necessary at the end of the ten year plan, offer a new shorter and more practical ROD amendment to address these issues. Ten year plans seem much more fiscally, technically, and economically responsible alternatives.

There is good ecological work to be done in the Silver Valley.

I670-23 In conclusion there is clearly good ecological work to be done in the Silver Valley. And the EPA has done

Response to comment I670-16
See response to Comment No. I474-1.

Response to comment I670-17
See response to Comment No. I54-2.

Response to comment I670-18
See response to Comment No. I822-14. The War Eagle Mine (WAL024) was one of 51 sites included in EPA's summer 2011 sampling program. Sampling at this site found that concentrations were below the decision criteria developed for determining inclusion of sites in the Selected Remedy. Therefore WAL024 is not included in the Selected Remedy.

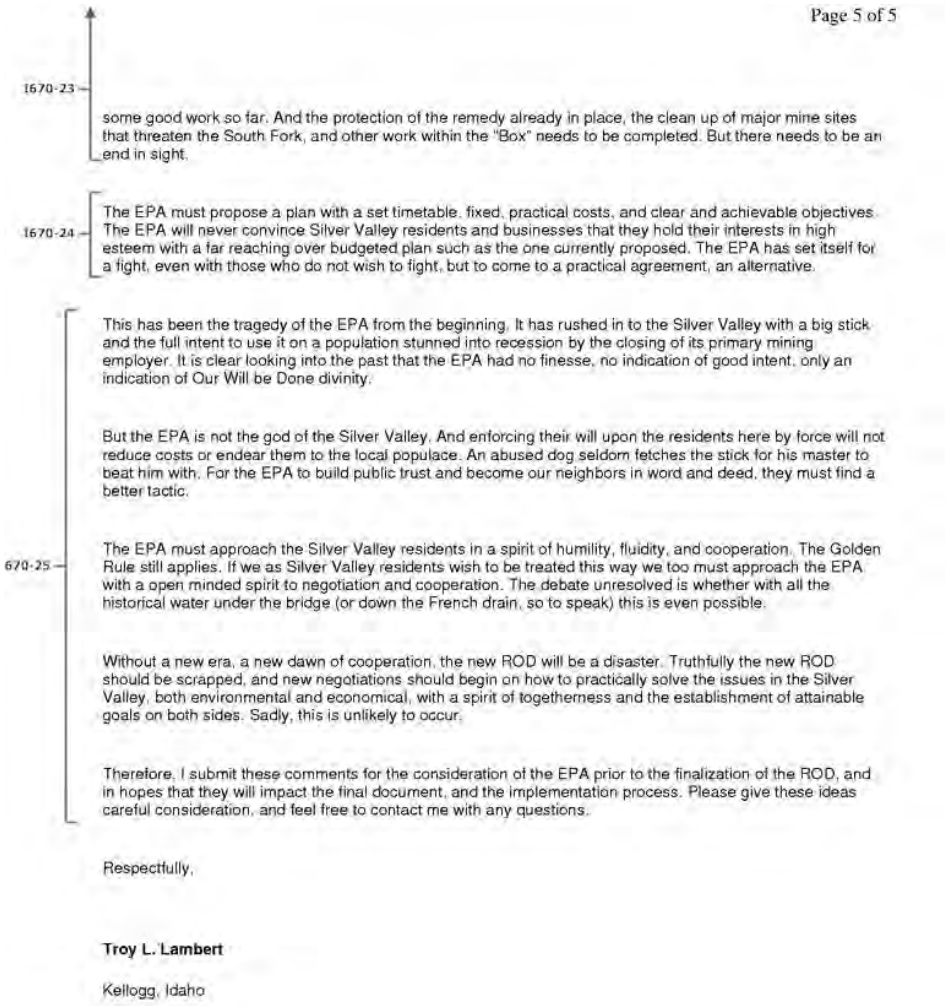
Response to comment I670-19
See responses to Comments No. I474-2, I58-1, and I58-2.

Response to comment I670-20
See response to Comment No. I474-2.

Response to comment I670-21
The ROD Amendment provides details regarding the implementation approach for the Selected Remedy, including where the work starts and how it will proceed over time. With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT over the last several years, EPA developed a logical and transparent prioritization process for cleanup actions. EPA plans to continue using this same collaborative prioritization process during implementation of the Selected Remedy.

Response to comment I670-22
See response to Comment No. I474-2.

Response to comment I670-23
Comment noted.



Page 5 of 5

I670-23 some good work so far. And the protection of the remedy already in place, the clean up of major mine sites that threaten the South Fork, and other work within the "Box" needs to be completed. But there needs to be an end in sight.

I670-24 The EPA must propose a plan with a set timetable, fixed, practical costs, and clear and achievable objectives. The EPA will never convince Silver Valley residents and businesses that they hold their interests in high esteem with a far reaching over budgeted plan such as the one currently proposed. The EPA has set itself for a fight, even with those who do not wish to fight, but to come to a practical agreement, an alternative.

This has been the tragedy of the EPA from the beginning. It has rushed in to the Silver Valley with a big stick and the full intent to use it on a population stunned into recession by the closing of its primary mining employer. It is clear looking into the past that the EPA had no finesse, no indication of good intent, only an indication of Our Will be Done divinity.

But the EPA is not the god of the Silver Valley. And enforcing their will upon the residents here by force will not reduce costs or endear them to the local populace. An abused dog seldom fetches the stick for his master to beat him with. For the EPA to build public trust and become our neighbors in word and deed, they must find a better tactic.

I670-25 The EPA must approach the Silver Valley residents in a spirit of humility, fluidity, and cooperation. The Golden Rule still applies. If we as Silver Valley residents wish to be treated this way we too must approach the EPA with a open minded spirit to negotiation and cooperation. The debate unresolved is whether with all the historical water under the bridge (or down the French drain, so to speak) this is even possible.

Without a new era, a new dawn of cooperation, the new ROD will be a disaster. Truthfully the new ROD should be scrapped, and new negotiations should begin on how to practically solve the issues in the Silver Valley, both environmental and economical, with a spirit of togetherness and the establishment of attainable goals on both sides. Sadly, this is unlikely to occur.

Therefore, I submit these comments for the consideration of the EPA prior to the finalization of the ROD, and in hopes that they will impact the final document, and the implementation process. Please give these ideas careful consideration, and feel free to contact me with any questions.

Respectfully,

Troy L. Lambert

Kellogg, Idaho

Response to comment I670-24

See responses to Comment Nos. I 58-1 and I58-2.

Response to comment I670-25

EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. EPA has been working closely with stakeholders and community members during development of the remedy, and remains committed to working cooperatively with the local communities during implementation. See response to Comment No. I822-14.

Lane, William, I671, Letter 618281

William Lane
to:
CDABasin
11/18/2010 05:24 PM
Show Details

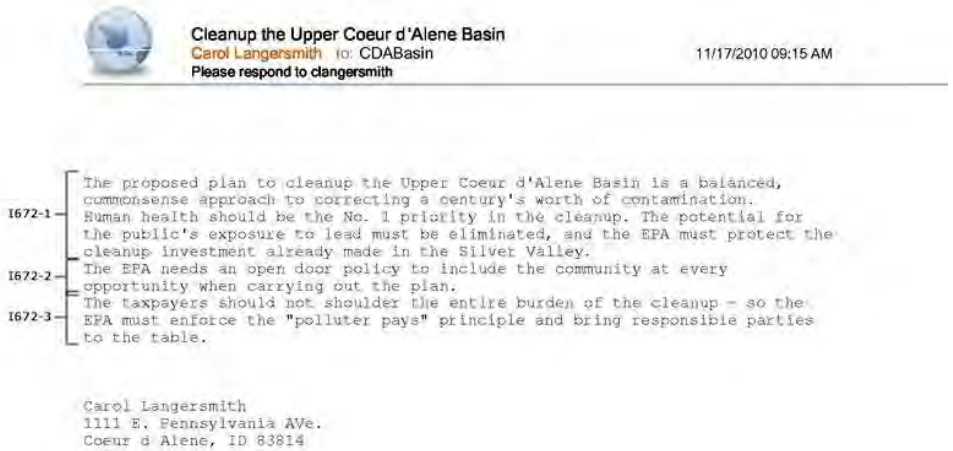
This is for your information
In other states when you sell property you are required by law to tell the buyers about any hazard's or contamination on the property. You are responsible for cleaning it up not passing it on. Banks will not finance-- realtor's can be held responsible. why does this not been told.
I671-1 – I believe the laws in Idaho should be examined and facts should be told. If the person that owns the property had to do the clean up before selling
they would have a different view.
I think some real estate lawyers should talk on that subject
I knowthis is a fact in Washington.
Thank You for hearing me.
William Lane 208 784 8707
box 510 Kellogg Idaho
83837

618281

Response to comment I671-1

Both federal and Idaho law requires the disclosure of lead contaminated soil by the owner of property that contains such contaminated soil. The Institutional Controls Program provides assistance to both sellers and prospective purchasers of residential and commercial property within the Bunker Hill Site. Additional information may be found at the Panhandle Health District web site -- http://www.phd1.idaho.gov/institutional/landtransdisclosure.cfm.

Langersmith, Carol, I672, Letter 618282



Cleanup the Upper Coeur d'Alene Basin
Carol Langersmith to: CDABasin 11/17/2010 09:15 AM
Please respond to clangersmith

I672-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I672-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I672-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Carol Langersmith
1111 E. Pennsylvania AVe.
Coeur d Alene, ID 83814

618282

Response to comment I672-1

See response to Comment No. I295-1.

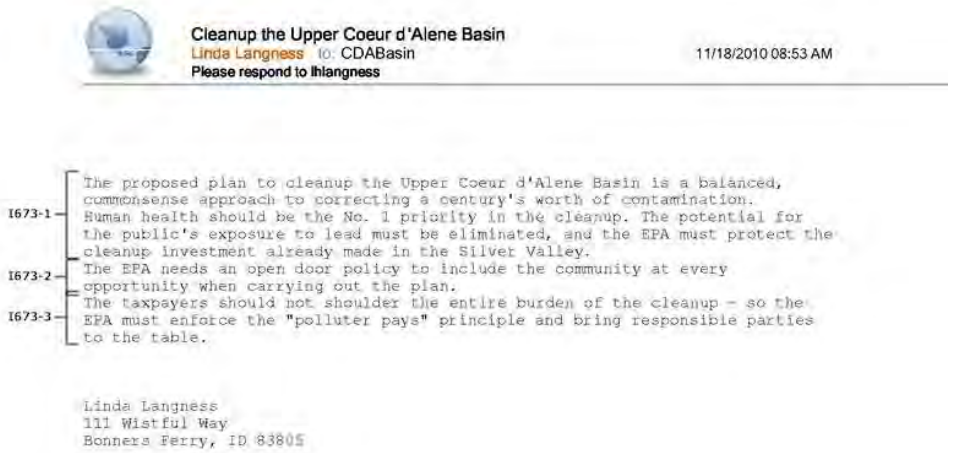
Response to comment I672-2

See response to Comment No. I295-2.

Response to comment I672-3

See response to Comment No. I295-3.

Langness, Linda, I673, Letter 618283



Cleanup the Upper Coeur d'Alene Basin
Linda Langness to: CDABasin 11/18/2010 08:53 AM
Please respond to lhlangness

I673-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I673-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I673-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Linda Langness
111 Wistful Way
Bonners Ferry, ID 83805

618283

Response to comment I673-1

See response to Comment No. I295-1.

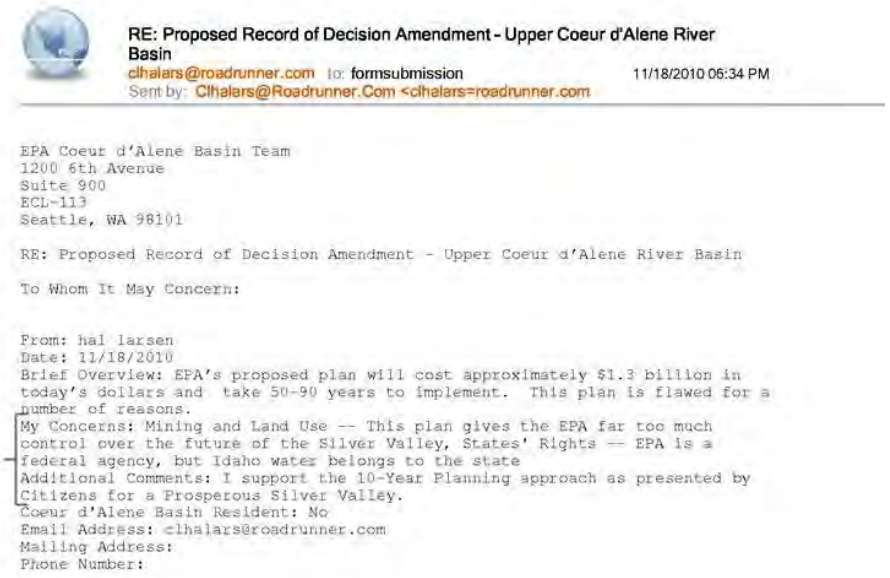
Response to comment I673-2

See response to Comment No. I295-2.

Response to comment I673-3

See response to Comment No. I295-3.

Larsen, Hal, I674, Letter 618284



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
clhalars@roadrunner.com to: formsubmission 11/18/2010 06:34 PM
Sent by: Clhalars@Roadrunner.Com <clhalars=roadrunner.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: hal larsen
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: clhalars@roadrunner.com
Mailing Address:
Phone Number:

I674-1

618284

Response to comment I674-1

See response to Comment No. I351-1.

Larson, Vicki, I390, Letter 616281

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
vicki@positivelypr.com to: formsubmission 11/15/2010 08:23 AM
Sent by: Vicki@Positivelypr.Com <vicki=positivelypr.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

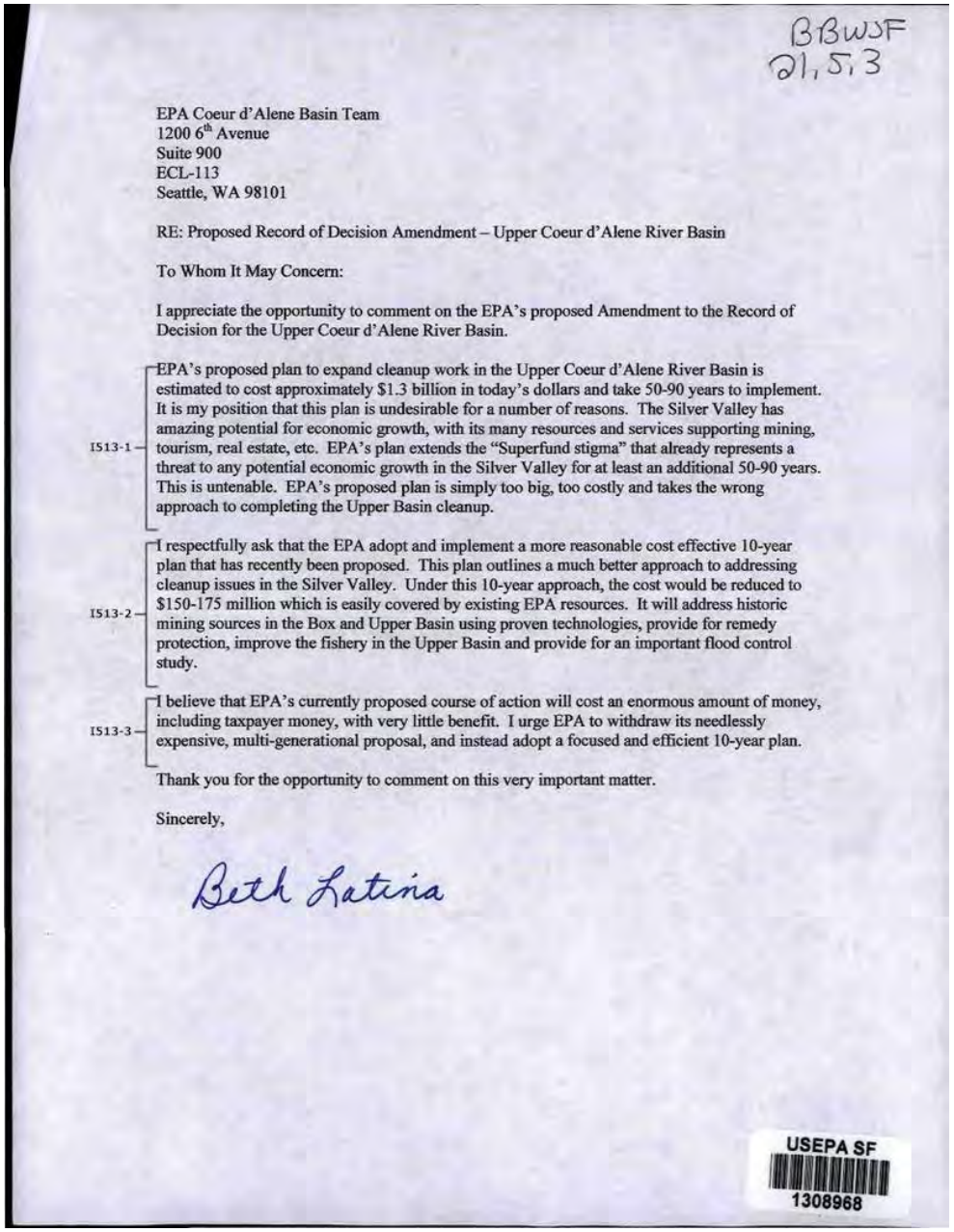
From: Vicki Larson
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I390-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: vicki@positivelypr.com
Mailing Address: 9723 W. George Lane|Post Falls|Idaho|83854|US
Phone Number:

616281

Response to comment I390-1

See response to Comment No. I351-1.

Latina, Beth, I513, Letter 1308968



BBWSF
21,513

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I513-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I513-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I513-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Beth Latina

USEPA SF
1308968

Response to comment I513-1
See response to Comment No. I474-1.

Response to comment I513-2
See response to Comment No. I474-2.

Response to comment I513-3
See response to Comment No. I474-3.

Latina, Beth, I393, Letter 616286

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
beth.latina@yahoo.com to: formsubmission 11/14/2010 02:38 PM
Sent by: Beth.Latina@Yahoo.Com <beth.latina=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Elizabeth Latina
Date: 11/14/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and
take 50-90 years to implement. This plan is flawed for a number of reasons.

I393-1 First of all has the EPA considered the impact of technology and what it could mean to the cleanup activities? If you lock the cleanup into a 50-90 year plan and technology races forward, wouldn' it make more sense to revisit the plan every 10 years instead and implement new technology and new ideas at that time? Not only that 1.3 billion dollars will be more like 5 or 6 billion in 50-90 years. As far as human health goes there are more centurians per capita living in the Silver Valley than most places in the United States. My husband was born here and has never lived anywhere else and he's healthy as are a lot of other people like him that we know. I believe the EPA is using the subject of human health as a smoke screen. I personally would rather breath the air, drink the water, swim, play, work and live here in the Silver Valley than any city, such as Seattle, Los Angeles, Chicago, or New York where the air is bad, the water stinks, the rives run brown with pollution and you have to play indoors. Please consider revising the ROD to 10 years, and then look at again. You are going to ruin a lot of lives and livlihoods with the current ROD.

I393-2 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: beth.latina@yahoo.com
Mailing Address: 1389 Montgomery Gulch Rd.|Kellogg|Idaho|83837|US
Phone Number: (208) 651-4178

616286

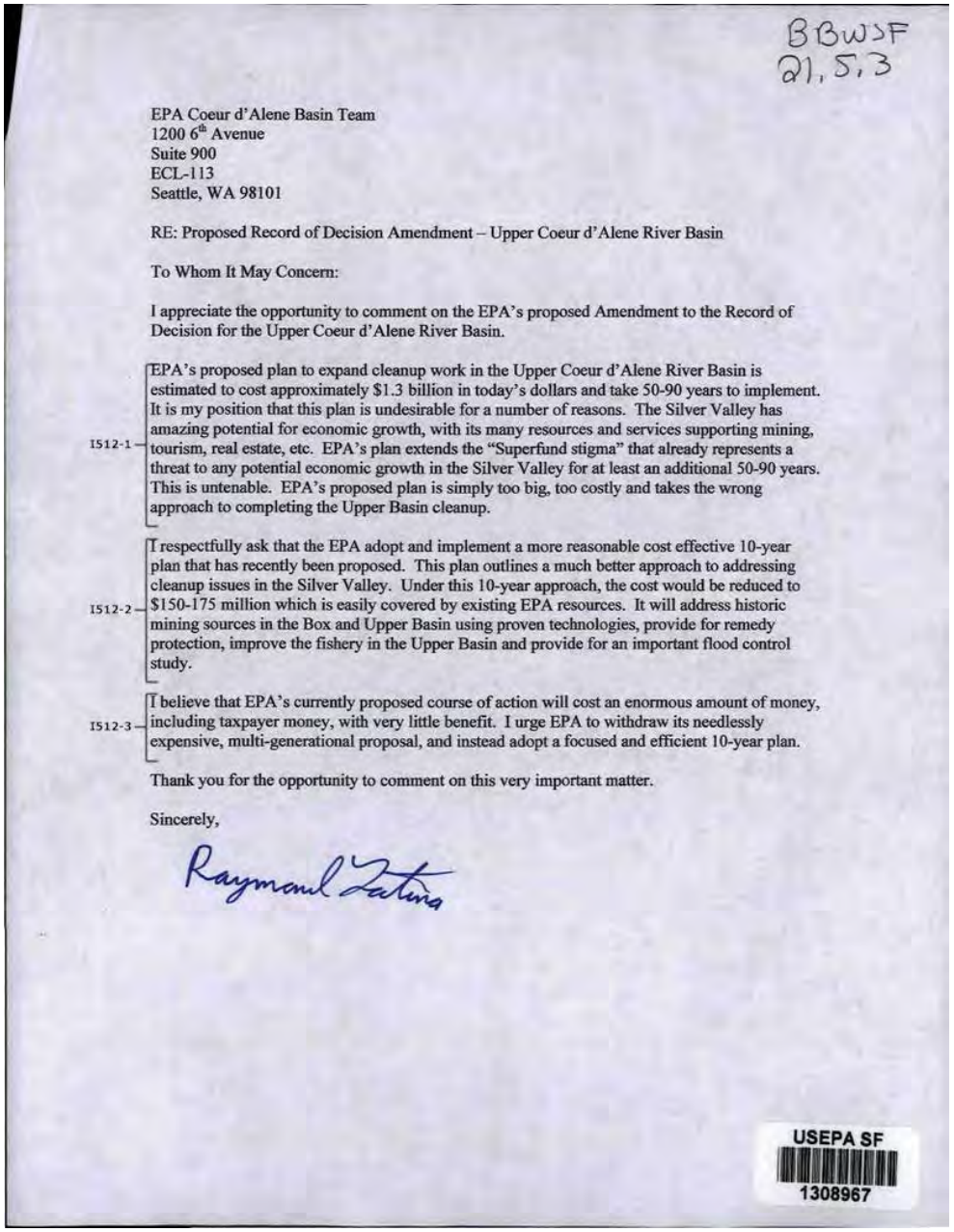
Response to comment I393-1

See responses to Comment Nos. I58-1 and I295-1.

Response to comment I393-2

See response to Comment No. I351-1.

Latina, Ray, I512, Letter 1308967



BBWSF
21, 5, 3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I512-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I512-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I512-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Raymond Latina

USEPA SF
1308967

Response to comment I512-1

See response to Comment No. I474-1.

Response to comment I512-2

See response to Comment No. I474-2.

Response to comment I512-3

See response to Comment No. I474-3.

Lauer, Doug, I675, Letter 618285

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
djlauer1@comcast.net to: formsubmission 11/17/2010 02:14 PM
Sent by: Djlauer1@Comcast.Net <djlauer1=comcast.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Doug Lauer
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I675-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: djlauer1@comcast.net
Mailing Address: 3118 S. Chapman Rd|Greenacres|WA|99016|US
Phone Number: (509) 921-8128

618285

Response to comment I675-1

See response to Comment No. I351-1.

Launhardt, Robert, I394, Letter 616287

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
relaun@gmail.com to: formsubmission 11/15/2010 12:51 PM
Sent by: Relaun@Gmail.Com <relaun=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Robert Launhardt
Date: 11/15/2010

I394-1 Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. It flies in the face of the original ROD for the Bunker Hill Superfund Site. Individual residential properties were tested in compliance with EPA test protocols. All properties with Pb levels of 1,000 ppm or higher were cleaned up in compliance with EPA protocols. Lead drove soil remediation; zinc drove water quality considerations, not with the intent to reduce Zn levels below those in which fish could survive and grow. Zinc was not identified as a human health issue. Zinc in the South Fork River basin is widespread. Being water soluble at normal pH, it would be impossible to totally prevent contamination. Thus, the issue should be decided on the basis of human health. In that context, please consider the fact that the South Fork River meets federal drinking water standards, except for human waste.

I394-2 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations

I394-3 Additional Comments: The Three Cities Lead Study performed several decades ago identified serious soils contamination in the cities studied. If I remember correctly, they were Baltimore, Boston, and Cincinnati. Many residential yards tested near or even above 2,000 ppm lead. Has the EPA cleaned up all residential yards in those cities? And if not, why not? Also, soil samples collected alongside major streets in Boise failed to pass EPA guidelines. The lead came from motor vehicle emissions. I know of no remediation in Boise. For that matter, I know of no remediation to remove soils contaminated by emission of vehicles burning leaded gasoline ANYWHERE along interstate

616287

Response to comment I394-1

Although human health protection has been and continues to be EPA's priority in the cleanup of the Upper Basin, it is also EPA's responsibility to address unacceptable risks to the environment.

Response to comment I394-2

See response to Comment No. I351-1.

Response to comment I394-3

See response to Comment No. I295-1.

I394-3

highway corridors. Perhaps EPA should address those major public health issues rather than expending over $ 1 billion in the Silver Valley, most of which would be for non public health issues.
Coeur d'Alene Basin Resident: Yes
Email Address: relaun@gmail.com
Mailing Address: 205 Woodland Drive, PO Box 1206|Pinehurst|Idaho|83850-1206|US
Phone Number: (208) 682-2168

No comments

Lavergne, Joyce, I676, Letter 618286

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jblavergne@frontier.com to: formsubmission 11/19/2010 08:11 AM
Sent by: Jblavergne@Frontier.Com <jblavergne=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Joyce Lavergne
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
I676-1

I do NOT support the 10 year plan,, it's like any of the bloated big goverment agentancies,, You think you know better then the lowly person,
I had my yard done's it nice, they did a good job,, and if I ever wanted to sell, I was told you have to have this done,, " scare tatic's ".
I676-2
Plus it gave Valley people jobs,,, becasue there is hardly any ,, mining, timber jobs because of the Heavy handed EPA....
this plan will cost even more jobs for this Valley,

All the mines have worked under federal guidlelines,,, where is their responsibilty in all this,,, ? is my questions,, for 100 years they have told the mine's mill's how to run their bussiness, so WHO is to blame,,, ? that's my question. I VOTE NO,,,
I676-3
Coeur d'Alene Basin Resident: Yes
Email Address: jblavergne@frontier.com
Mailing Address: P.O.Box 656, 25 Caron Ct Rd|Wallace|Idaho|83873|US
Phone Number:

618286

Response to comment I676-1

See response to Comment No. I351-1.

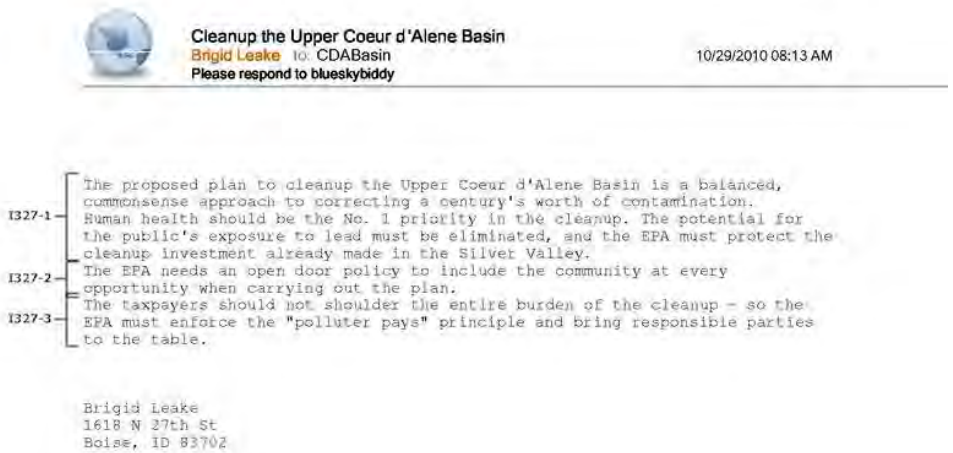
Response to comment I676-2

See responses to Comment Nos. I474-2 and I54-2.

Response to comment I676-3

Comment noted.

Leake, Brigid, I327, Letter 614457



Cleanup the Upper Coeur d'Alene Basin
Brigid Leake to: CDABasin 10/29/2010 08:13 AM
Please respond to blueskybiddy

I327-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I327-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I327-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Brigid Leake
1618 N 27th St
Boise, ID 83702

614457

Response to comment I327-1

See response to Comment No. I295-1.

Response to comment I327-2

See response to Comment No. I295-2.

Response to comment I327-3

See response to Comment No. I295-3.

Legarza, Ken, I678, Letter 618288

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
pinion@bmnv.com to: formsubmission 11/17/2010 11:33 AM
Sent by: Pinion@Bmnv.Com <pinion=bmnv.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Ken Legarza
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I do not support and if it was emplemented in our state(Nevada) I still would not support any 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: pinion@bmnv.com
Mailing Address: PO Box 485|Battle Mountain|Nevada|89820|US
Phone Number: (775) 635-5558

I678-1

I678-2

618288

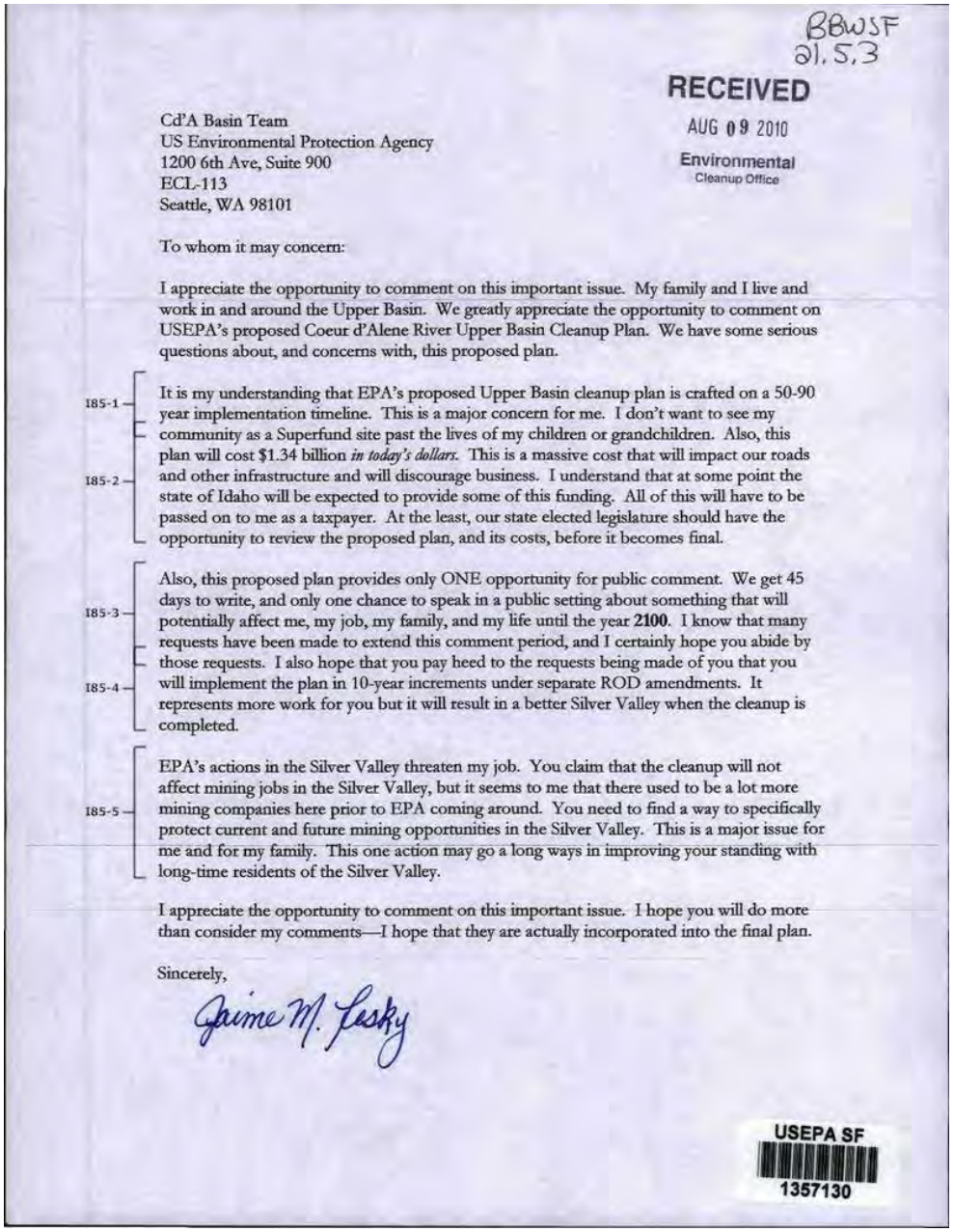
Response to comment I678-1

See response to Comment No. I351-1.

Response to comment I678-2

See response to Comment No. I474-2.

Lesky, Jaime, I85, Letter 1357130



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I85-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I85-2

I85-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I85-4 — will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I85-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Jaime M. Lesky

USEPA SF
1357130

Response to comment I85-1
See response to Comment No. I58-1.

Response to comment I85-2
See response to Comment No. I58-2.

Response to comment I85-3
See response to Comment No. I58-3.

Response to comment I85-4
See response to Comment No. I58-4.

Response to comment I85-5
See response to Comment No. I58-5.

Lesky, Jaime, I793, Letter 1365171

BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I793-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I793-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I793-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

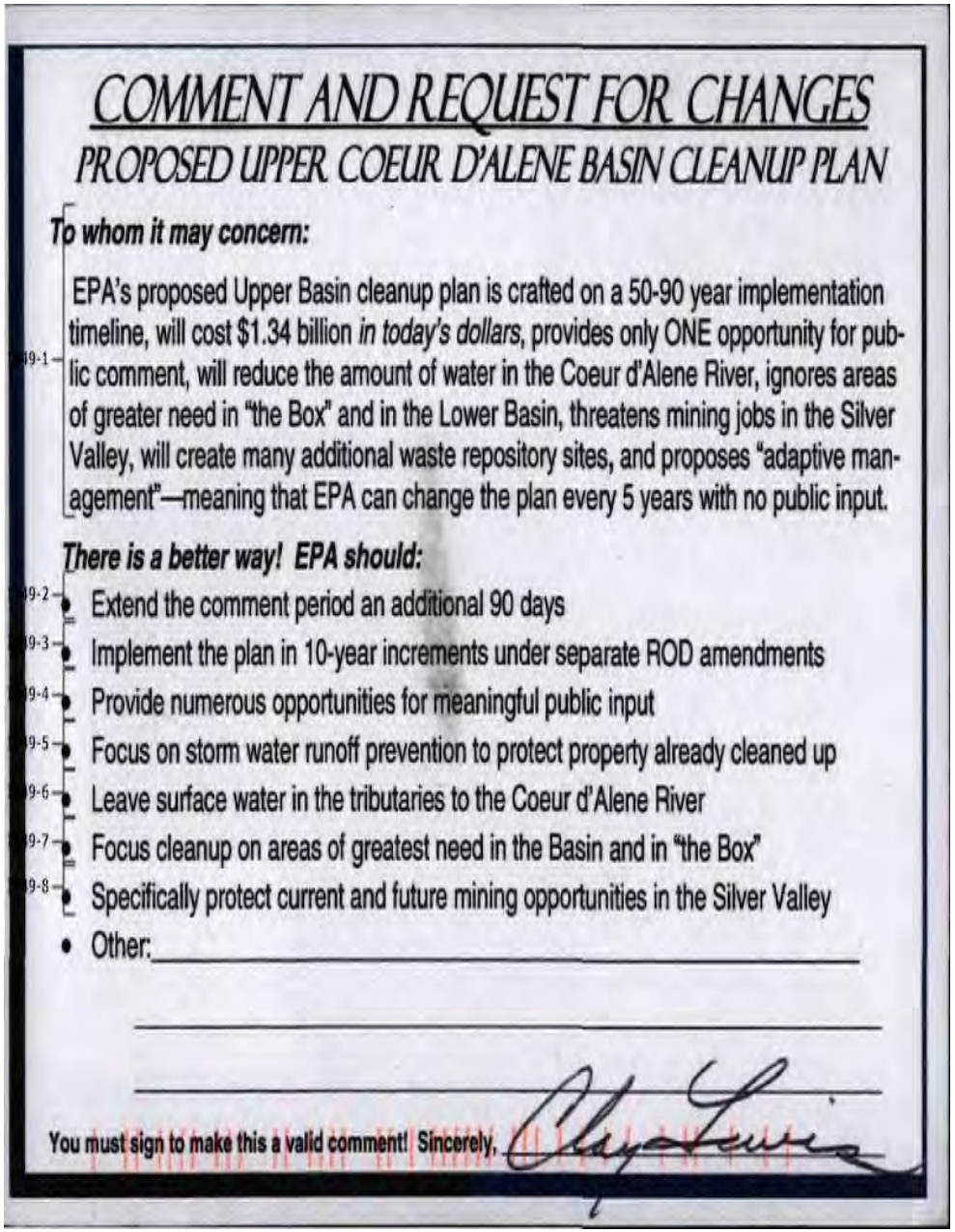
Sincerely, Jaime M. Lesky

Response to comment I793-1
See response to Comment No. I474-1.

Response to comment I793-2
See response to Comment No. I474-2.

Response to comment I793-3
See response to Comment No. I474-3.

Lewis, Clay, I149, Letter 1357285



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I49-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I49-2 Extend the comment period an additional 90 days
- I49-3 Implement the plan in 10-year increments under separate ROD amendments
- I49-4 Provide numerous opportunities for meaningful public input
- I49-5 Focus on storm water runoff prevention to protect property already cleaned up
- I49-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I49-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I49-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Clay Lewis

Response to comment I149-1
See response to Comment No. I25-1.

Response to comment I149-2
See response to Comment No. I25-2.

Response to comment I149-3
See response to Comment No. I25-3.

Response to comment I149-4
See response to Comment No. I25-4.

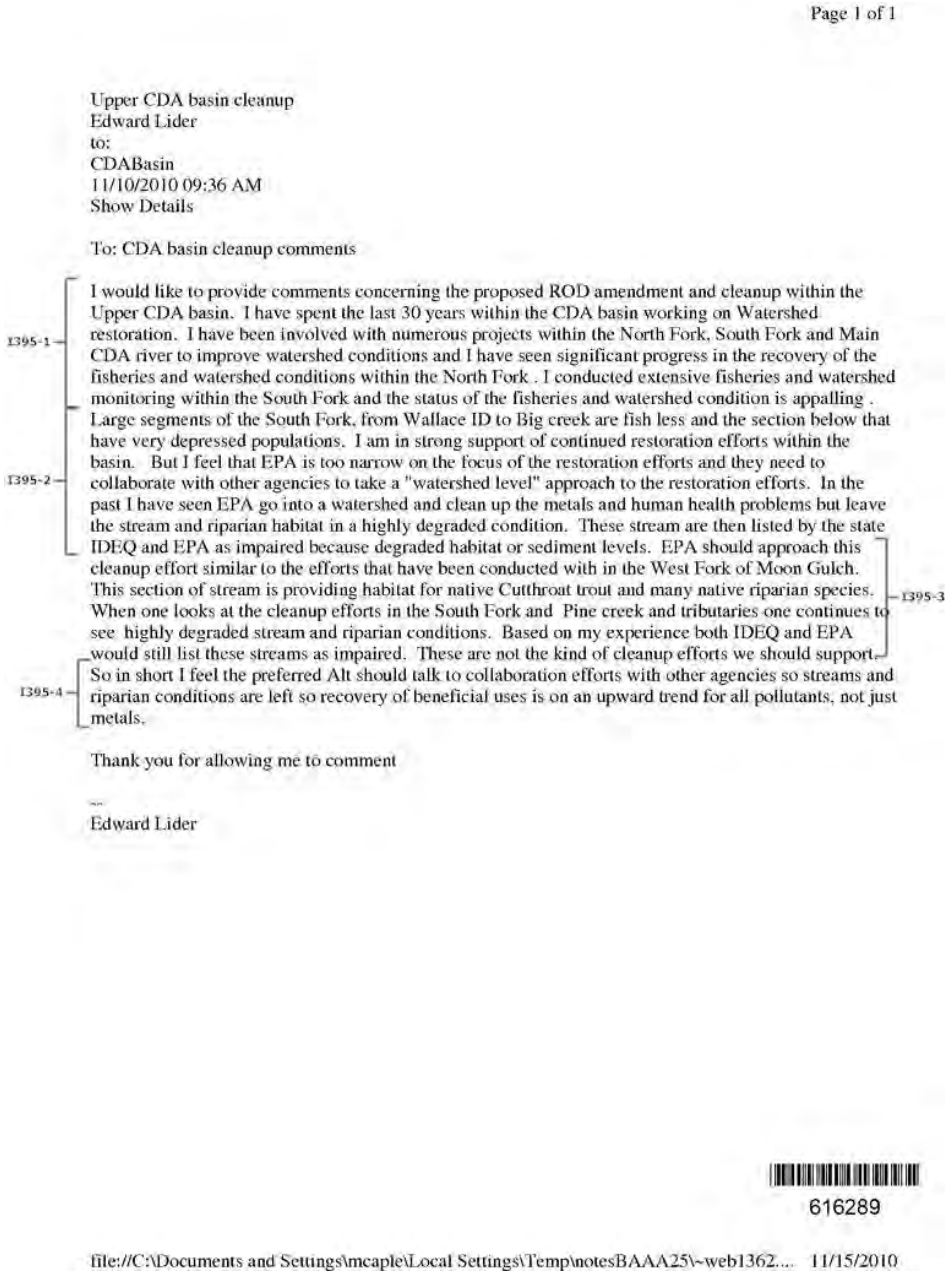
Response to comment I149-5
See response to Comment No. I25-5.

Response to comment I149-6
See response to Comment No. I25-6.

Response to comment I149-7
See response to Comment No. I25-7.

Response to comment I149-8
See response to Comment No. I25-8.

Lider, Edward, I395, Letter 616289



Page 1 of 1

Upper CDA basin cleanup
Edward Lider
to:
CDABasin
11/10/2010 09:36 AM
Show Details

To: CDA basin cleanup comments

I395-1 I would like to provide comments concerning the proposed ROD amendment and cleanup within the Upper CDA basin. I have spent the last 30 years within the CDA basin working on Watershed restoration. I have been involved with numerous projects within the North Fork, South Fork and Main CDA river to improve watershed conditions and I have seen significant progress in the recovery of the fisheries and watershed conditions within the North Fork . I conducted extensive fisheries and watershed monitoring within the South Fork and the status of the fisheries and watershed condition is appalling .

I395-2 Large segments of the South Fork, from Wallace ID to Big creek are fish less and the section below that have very depressed populations. I am in strong support of continued restoration efforts within the basin. But I feel that EPA is too narrow on the focus of the restoration efforts and they need to collaborate with other agencies to take a "watershed level" approach to the restoration efforts. In the past I have seen EPA go into a watershed and clean up the metals and human health problems but leave the stream and riparian habitat in a highly degraded condition. These stream are then listed by the state IDEQ and EPA as impaired because degraded habitat or sediment levels. EPA should approach this cleanup effort similar to the efforts that have been conducted with in the West Fork of Moon Gulch. This section of stream is providing habitat for native Cutthroat trout and many native riparian species. When one looks at the cleanup efforts in the South Fork and Pine creek and tributaries one continues to see highly degraded stream and riparian conditions. Based on my experience both IDEQ and EPA would still list these streams as impaired. These are not the kind of cleanup efforts we should support. I395-3

I395-4 So in short I feel the preferred Alt should talk to collaboration efforts with other agencies so streams and riparian conditions are left so recovery of beneficial uses is on an upward trend for all pollutants, not just metals.

Thank you for allowing me to comment

--
Edward Lider

616289

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web1362... 11/15/2010

Response to comment I395-1

Thank you for your comment.

Response to comment I395-2

Thank you for your comment. During implementation of the Selected Remedy EPA will take a "watershed level" approach to cleanup actions. EPA will collaborate with federal Natural Resource Trustees (the U.S. Departments of the Interior and Agriculture) to conduct restoration work following remedial actions in the Upper Basin.

Response to comment I395-3

Thank you for your comment. EPA will conduct stream and riparian stabilization actions following remedial actions within creeks and rivers. EPA will be collaborating with other Federal agencies, including U.S. Fish and Wildlife Service, U.S. Forest Service, and the Corps of Engineers, to implement this work. Additional restoration work may be conducted by Federal agencies in the context of restoration of natural resources.

Response to comment I395-4

The Selected Remedy includes contaminated waste removal actions in and adjacent to areas of the SFCDR and some of its tributaries. Once the removal portion of a cleanup action has been completed, some contamination may remain adjacent to the stream and riparian area (i.e., the banks of the stream or river), depending on the site and the extent of the contaminated wastes. Following the removal of contamination, the banks will be stabilized to reduce erosion and further contaminated sediment loading to the stream or river in those cases where not all contamination could feasibly be removed. EPA has worked collaboratively with other agencies in developing the Selected Remedy and will continue this effort during its implementation. For further information regarding EPA's collaborative plans for employing ecological response metrics in the cleanup, see response to Comment No. SA4-13.

Liebetrau, Jim, I679, Letter 618289

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

jim.liebetrau@affcomfg.com (to: formsubmission) 11/18/2010 03:24 PM

Sent by: Jim.Liebetrau@Affcomfg.Com <jim.liebetrau=affcomfg.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

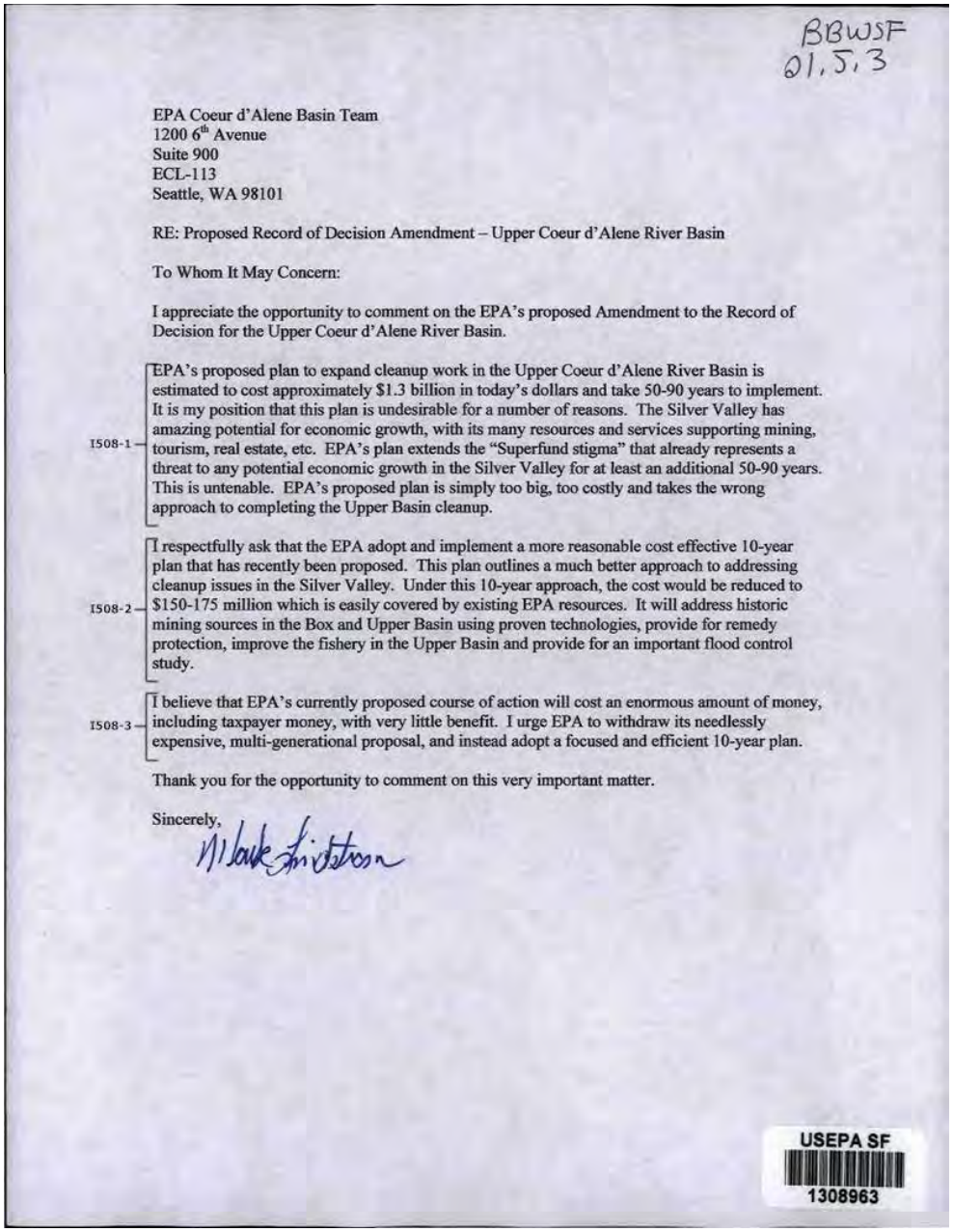
From: Jim Liebetrau
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. We need to develop resources not take them out of play. No wonder all the jobs are going overseas.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its
I679-1 massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. Again we need more private job in this country and less government.
Coeur d'Alene Basin Resident: No
Email Address: jim.liebetrau@affcomfg.com
Mailing Address:
Phone Number:

618289

Response to comment I679-1

See response to Comment No. I351-1.

Lindstrom, Mark, I508, Letter 1308963



BBWSF
01.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I508-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I508-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I508-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Mark Lindstrom

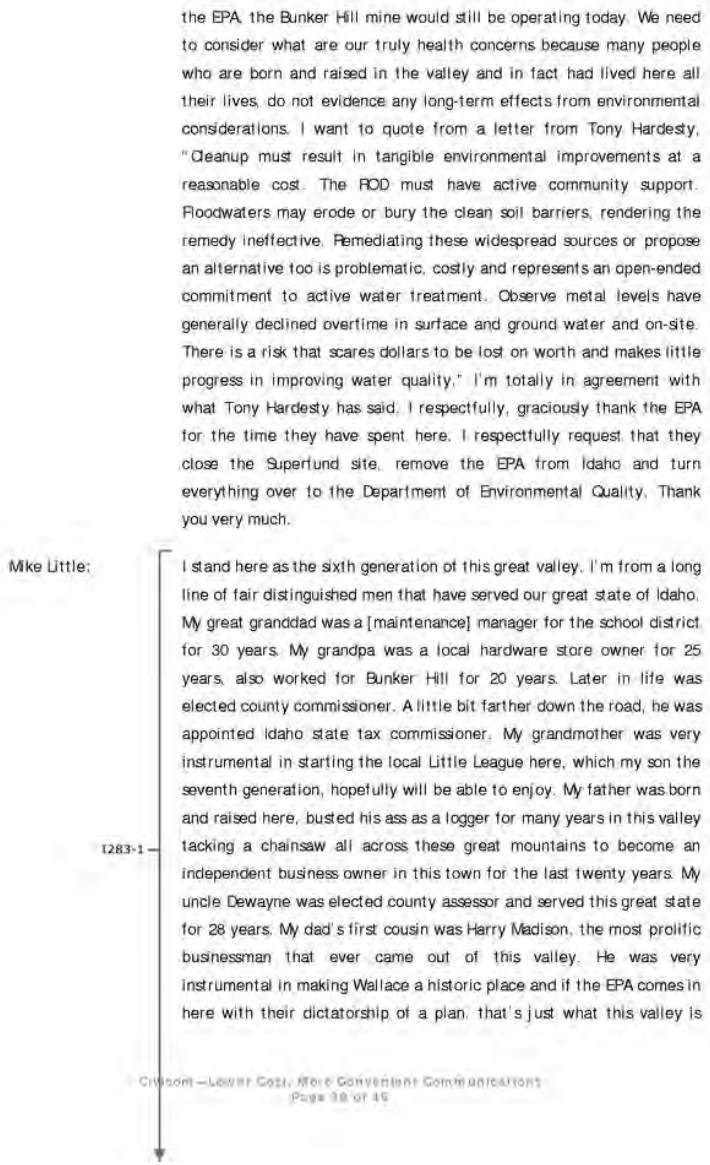
USEPA SF
1308963

Response to comment I508-1
See response to Comment No. I474-1.

Response to comment I508-2
See response to Comment No. I474-2.

Response to comment I508-3
See response to Comment No. I474-3.

Little, Mike, I283, Letter 616015-48



the EPA, the Bunker Hill mine would still be operating today. We need to consider what are our truly health concerns because many people who are born and raised in the valley and in fact had lived here all their lives, do not evidence any long-term effects from environmental considerations. I want to quote from a letter from Tony Hardesty, "Cleanup must result in tangible environmental improvements at a reasonable cost. The ROD must have active community support. Floodwaters may erode or bury the clean soil barriers, rendering the remedy ineffective. Remediating these widespread sources or propose an alternative too is problematic, costly and represents an open-ended commitment to active water treatment. Observe metal levels have generally declined overtime in surface and ground water and on-site. There is a risk that scares dollars to be lost on worth and makes little progress in improving water quality." I'm totally in agreement with what Tony Hardesty has said. I respectfully, graciously thank the EPA for the time they have spent here. I respectfully request that they close the Superfund site, remove the EPA from Idaho and turn everything over to the Department of Environmental Quality. Thank you very much.

Mike Little:

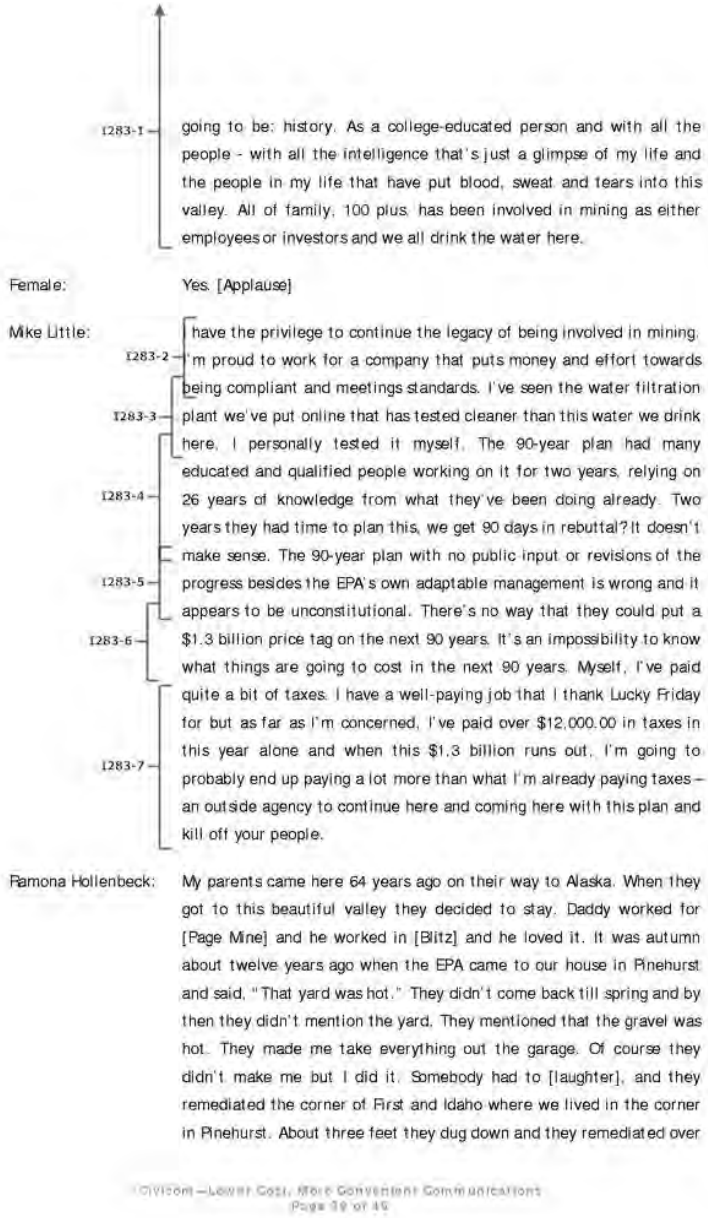
I283-1

I stand here as the sixth generation of this great valley. I'm from a long line of fair distinguished men that have served our great state of Idaho. My great granddad was a [maintenance] manager for the school district for 30 years. My grandpa was a local hardware store owner for 25 years, also worked for Bunker Hill for 20 years. Later in life was elected county commissioner. A little bit farther down the road, he was appointed Idaho state tax commissioner. My grandmother was very instrumental in starting the local Little League here, which my son the seventh generation, hopefully will be able to enjoy. My father was born and raised here, busted his ass as a logger for many years in this valley tacking a chainsaw all across these great mountains to become an independent business owner in this town for the last twenty years. My uncle Dewayne was elected county assessor and served this great state for 28 years. My dad's first cousin was Harry Madison, the most prolific businessman that ever came out of this valley. He was very instrumental in making Wallace a historic place and if the EPA comes in here with their dictatorship of a plan, that's just what this valley is

CityCom – Lower Cost, More Convenient Communications
Page 38 of 49

Response to comment I283-1

Thank you for your comments.



I283-1 going to be: history. As a college-educated person and with all the people - with all the intelligence that's just a glimpse of my life and the people in my life that have put blood, sweat and tears into this valley. All of family, 100 plus, has been involved in mining as either employees or investors and we all drink the water here.

Female: Yes. [Applause]

Mike Little: I have the privilege to continue the legacy of being involved in mining.

I283-2 I'm proud to work for a company that puts money and effort towards being compliant and meetings standards. I've seen the water filtration

I283-3 plant we've put online that has tested cleaner than this water we drink here. I personally tested it myself. The 90-year plan had many educated and qualified people working on it for two years, relying on

I283-4 26 years of knowledge from what they've been doing already. Two years they had time to plan this, we get 90 days in rebuttal? It doesn't make sense. The 90-year plan with no public input or revisions of the

I283-5 progress besides the EPA's own adaptable management is wrong and it appears to be unconstitutional. There's no way that they could put a

I283-6 $1.3 billion price tag on the next 90 years. It's an impossibility to know what things are going to cost in the next 90 years. Myself, I've paid quite a bit of taxes. I have a well-paying job that I thank Lucky Friday for but as far as I'm concerned, I've paid over $12,000.00 in taxes in this year alone and when this $1.3 billion runs out, I'm going to

I283-7 probably end up paying a lot more than what I'm already paying taxes – an outside agency to continue here and coming here with this plan and kill off your people.

Ramona Hollenbeck: My parents came here 64 years ago on their way to Alaska. When they got to this beautiful valley they decided to stay. Daddy worked for [Page Mine] and he worked in [Blitz] and he loved it. It was autumn about twelve years ago when the EPA came to our house in Pinehurst and said, "That yard was hot." They didn't come back till spring and by then they didn't mention the yard. They mentioned that the gravel was hot. They made me take everything out the garage. Of course they didn't make me but I did it. Somebody had to [laughter], and they remediated the corner of First and Idaho where we lived in the corner in Pinehurst. About three feet they dug down and they remediated over

Response to comment I283-2
Thank you for your comment.

Response to comment I283-3
Thank you for your comment.

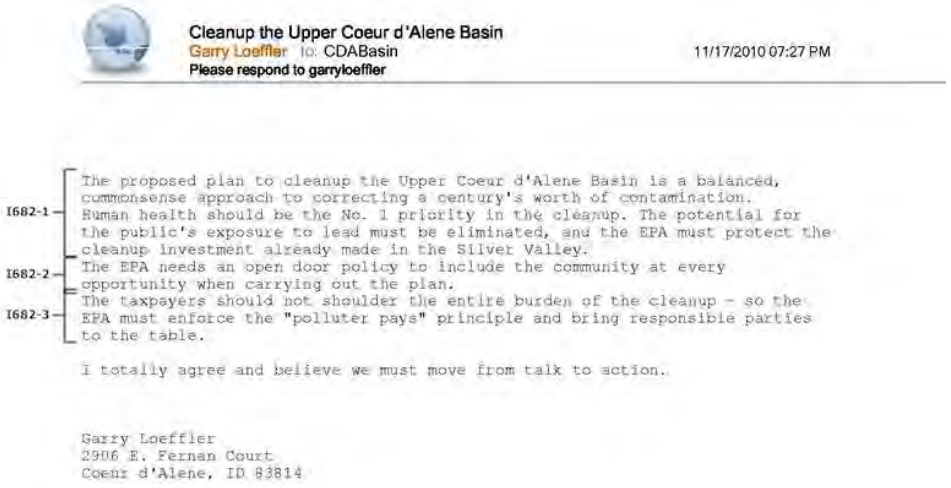
Response to comment I283-4
See response to Comment No. I54-6.

Response to comment I283-5
See response to Comment No. LJ11-2.

Response to comment I283-6
See response to Comment No. I54-12.

Response to comment I283-7
See response to Comment No. I295-3.

Loeffler, Gary, I682, Letter 618292



Cleanup the Upper Coeur d'Alene Basin
Garry Loeffler to: CDABasin 11/17/2010 07:27 PM
Please respond to garryloeffler

I682-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I682-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I682-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

I totally agree and believe we must move from talk to action.

Garry Loeffler
2906 E. Fernan Court
Coeur d'Alene, ID 83814

618292

Response to comment I682-1

See response to Comment No. I295-1.

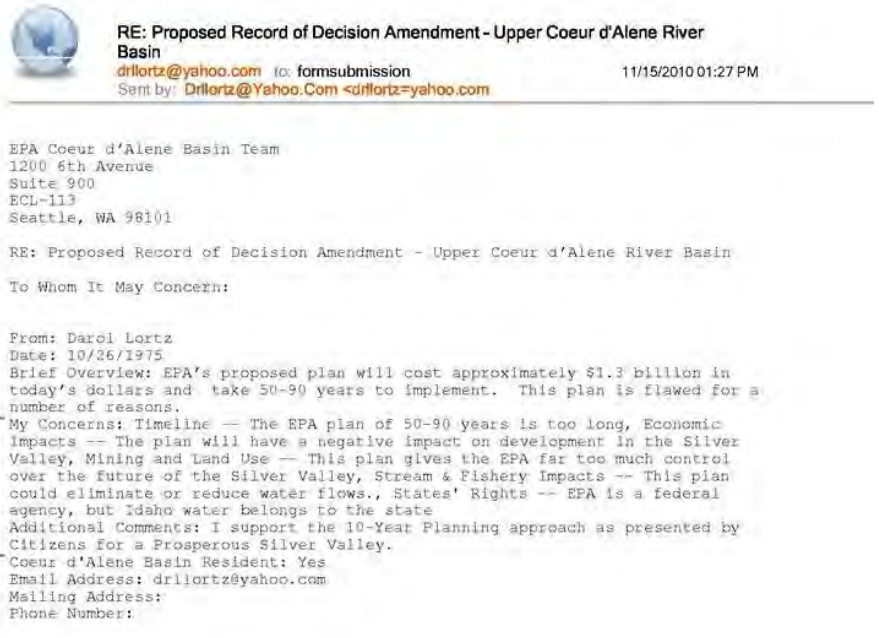
Response to comment I682-2

See response to Comment No. I295-2.

Response to comment I682-3

See response to Comment No. I295-3.

Lortz, Darol, I396, Letter 616290



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
drllortz@yahoo.com to: formsubmission 11/15/2010 01:27 PM
Sent by: Drllortz@Yahoo.Com <drllortz=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

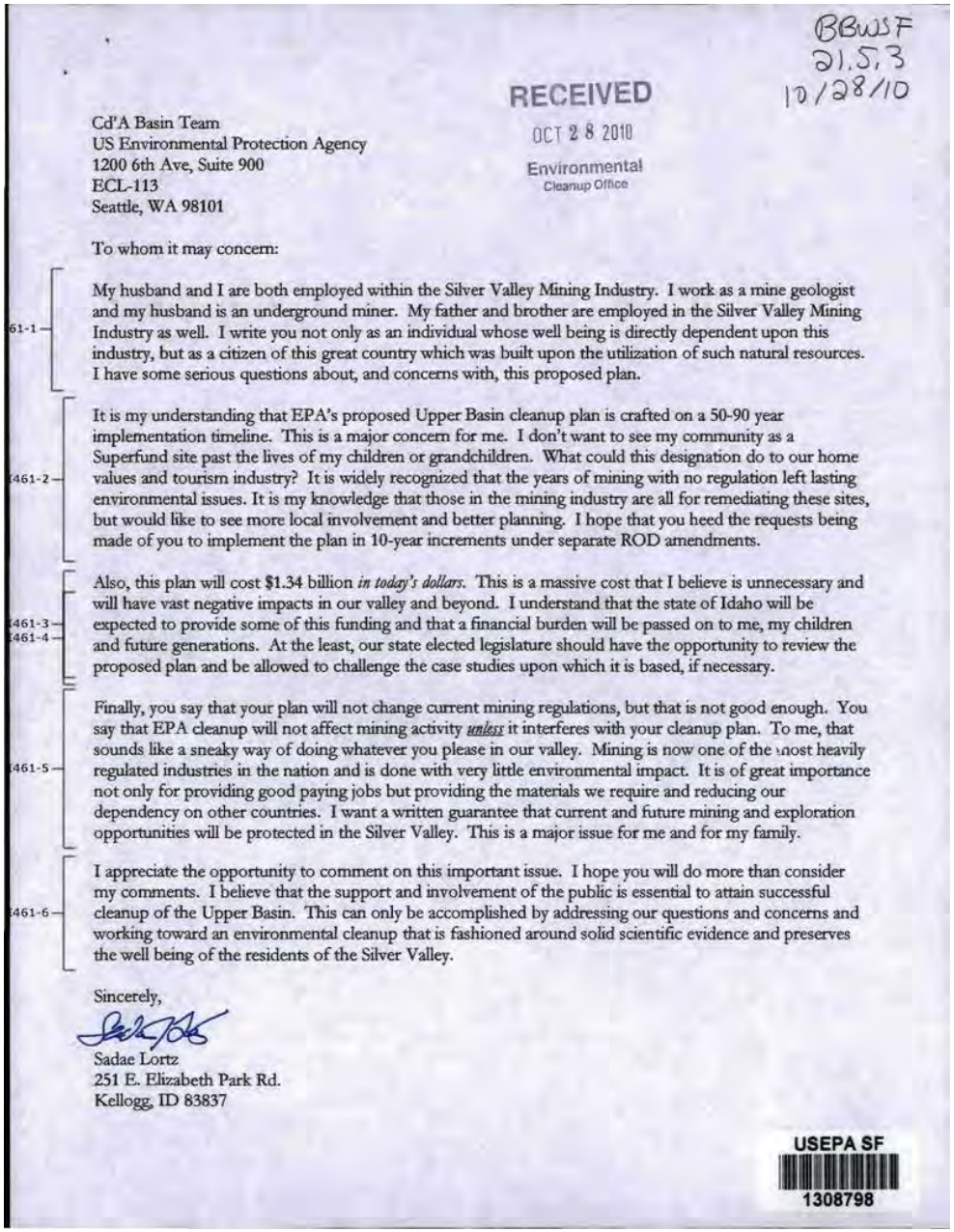
From: Darol Lortz
Date: 10/26/1975
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I396-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: drllortz@yahoo.com
Mailing Address:
Phone Number:

616290

Response to comment I396-1

See response to Comment No. I351-1.

Lortz, Sadae, I461, Letter 1308798



BBWSF
21.5.3
10/28/10

RECEIVED
OCT 28 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I461-1 My husband and I are both employed within the Silver Valley Mining Industry. I work as a mine geologist and my husband is an underground miner. My father and brother are employed in the Silver Valley Mining Industry as well. I write you not only as an individual whose well being is directly dependent upon this industry, but as a citizen of this great country which was built upon the utilization of such natural resources. I have some serious questions about, and concerns with, this proposed plan.

I461-2 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. What could this designation do to our home values and tourism industry? It is widely recognized that the years of mining with no regulation left lasting environmental issues. It is my knowledge that those in the mining industry are all for remediating these sites, but would like to see more local involvement and better planning. I hope that you heed the requests being made of you to implement the plan in 10-year increments under separate ROD amendments.

I461-3 I461-4 Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that I believe is unnecessary and will have vast negative impacts in our valley and beyond. I understand that the state of Idaho will be expected to provide some of this funding and that a financial burden will be passed on to me, my children and future generations. At the least, our state elected legislature should have the opportunity to review the proposed plan and be allowed to challenge the case studies upon which it is based, if necessary.

I461-5 Finally, you say that your plan will not change current mining regulations, but that is not good enough. You say that EPA cleanup will not affect mining activity *unless* it interferes with your cleanup plan. To me, that sounds like a sneaky way of doing whatever you please in our valley. Mining is now one of the most heavily regulated industries in the nation and is done with very little environmental impact. It is of great importance not only for providing good paying jobs but providing the materials we require and reducing our dependency on other countries. I want a written guarantee that current and future mining and exploration opportunities will be protected in the Silver Valley. This is a major issue for me and for my family.

I461-6 I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments. I believe that the support and involvement of the public is essential to attain successful cleanup of the Upper Basin. This can only be accomplished by addressing our questions and concerns and working toward an environmental cleanup that is fashioned around solid scientific evidence and preserves the well being of the residents of the Silver Valley.

Sincerely,

Sadae Lortz
251 E. Elizabeth Park Rd.
Kellogg, ID 83837

USEPA SF
1308798

Response to comment I461-1
See response to Comment No. I58-5.

Response to comment I461-2
See responses to Comment Nos. I58-1 and I54-2.

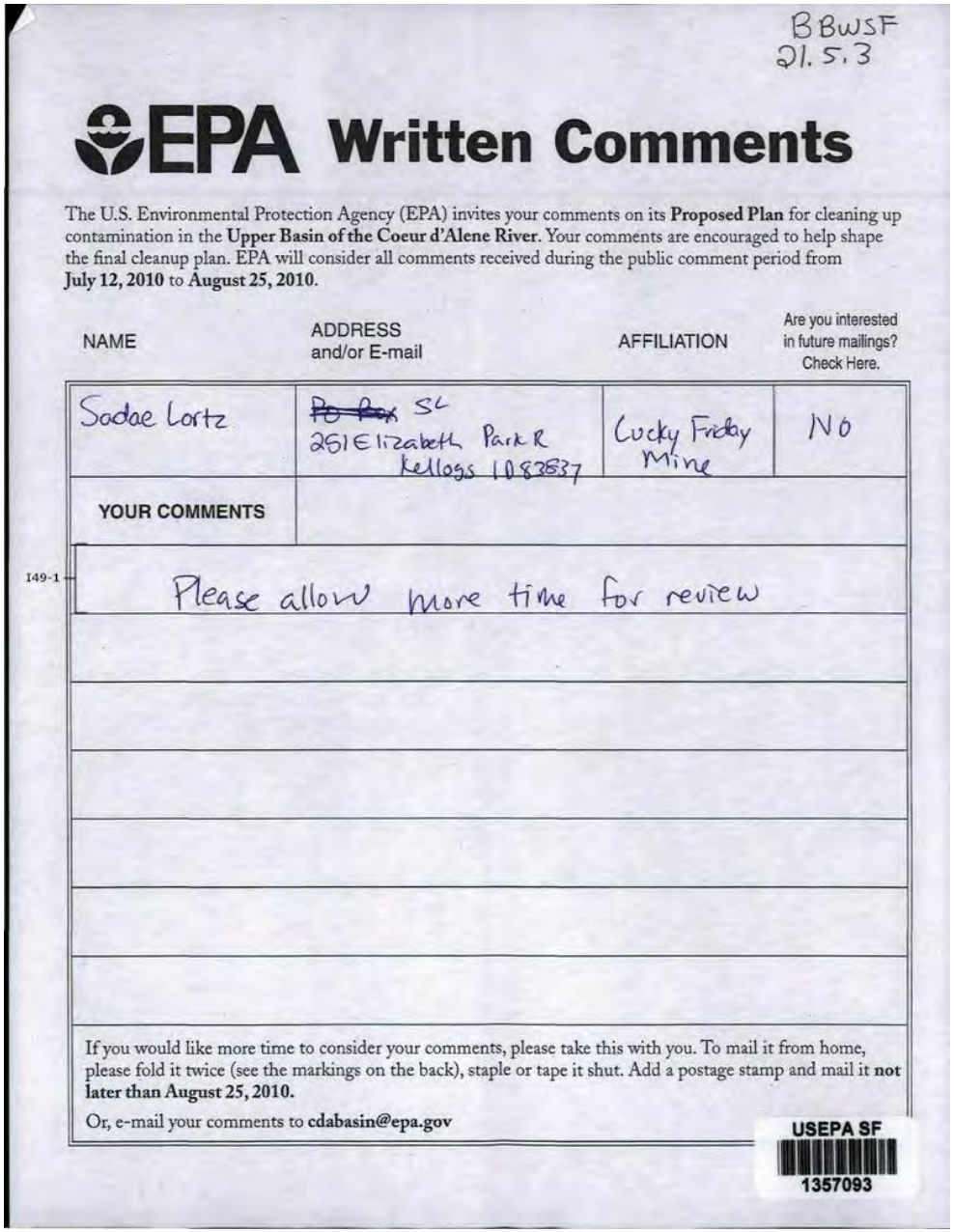
Response to comment I461-3
See responses to Comment Nos. I58-2 and LJ39-5.

Response to comment I461-4
See responses to Comment Nos. I295-3 and LJ39-5.

Response to comment I461-5
See response to Comment No. I58-5.

Response to comment I461-6
Thank you for your comment. See response to Comment No. I295-2.

Lortz, Sadae, I49, Letter 1357093



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Sadae Lortz	~~PO Box~~ SC 251 Elizabeth Park R Kellogs ID 83837	Lucky Friday Mine	NO

YOUR COMMENTS

I49-1 Please allow more time for review

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

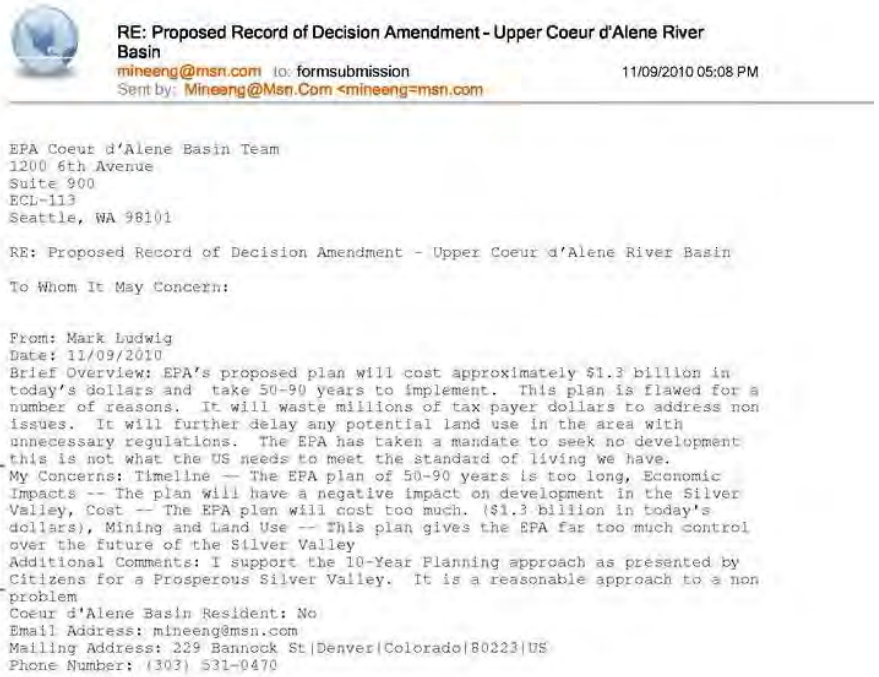
Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357093

Response to comment I49-1

See response to Comment No. I54-6.

Ludwig, Mark, I397, Letter 616292



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

mineeng@msn.com to: formsubmission 11/09/2010 05:08 PM

Sent by: Mineeng@Msn.Com <mineeng=msn.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

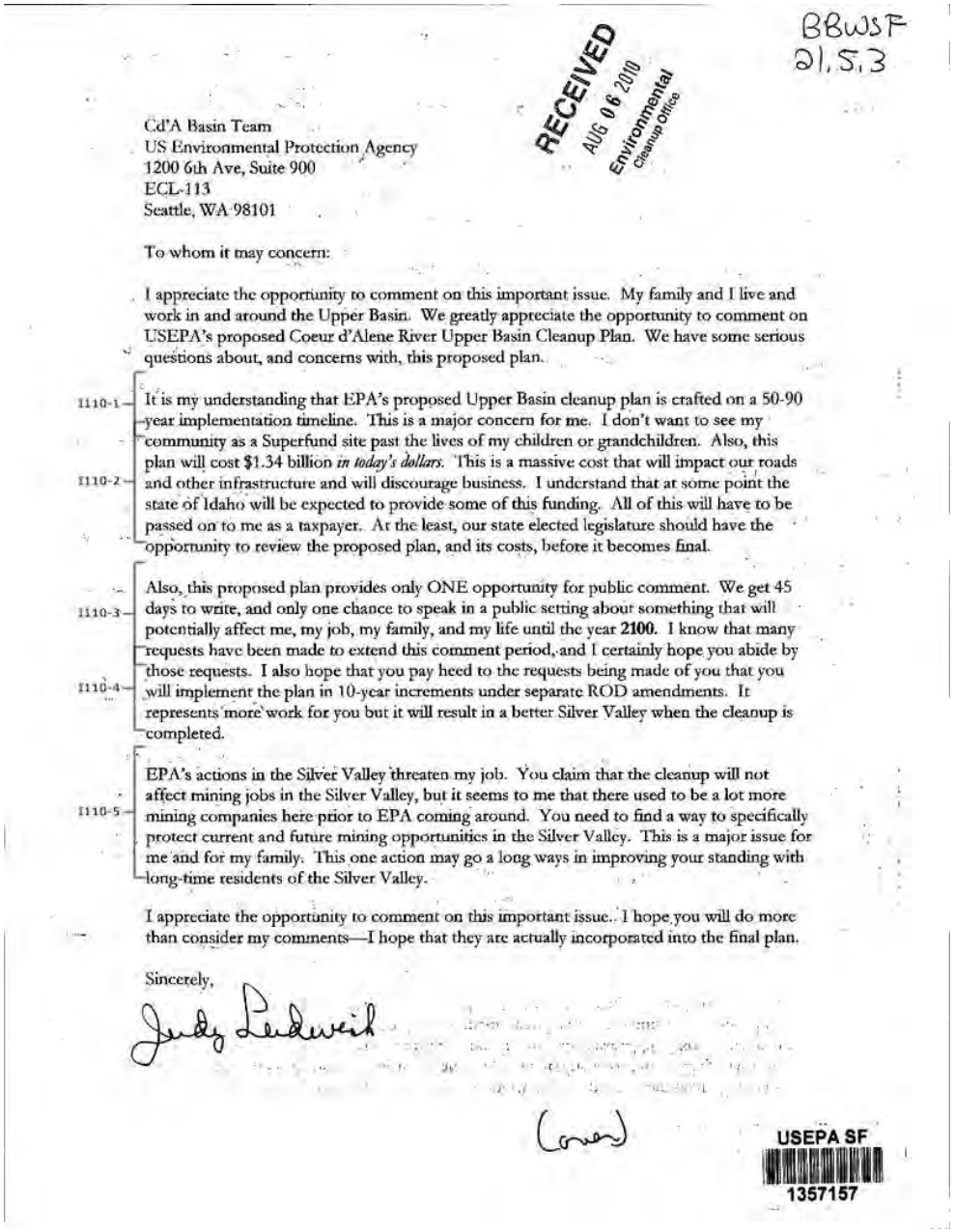
From: Mark Ludwig
Date: 11/09/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. It will waste millions of tax payer dollars to address non issues. It will further delay any potential land use in the area with unnecessary regulations. The EPA has taken a mandate to seek no development this is not what the US needs to meet the standard of living we have.
I397-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. It is a reasonable approach to a non problem
Coeur d'Alene Basin Resident: No
Email Address: mineeng@msn.com
Mailing Address: 229 Bannock St|Denver|Colorado|80223|US
Phone Number: (303) 531-0470

616292

Response to comment I397-1

See response to Comment No. I351-1.

Ludwish, Judy, I110, Letter 1357157



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21.5.3

RECEIVED
AUG 06 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I110-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I110-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I110-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I110-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I110-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Judy Ludwish

(over)

USEPA SF
1357157

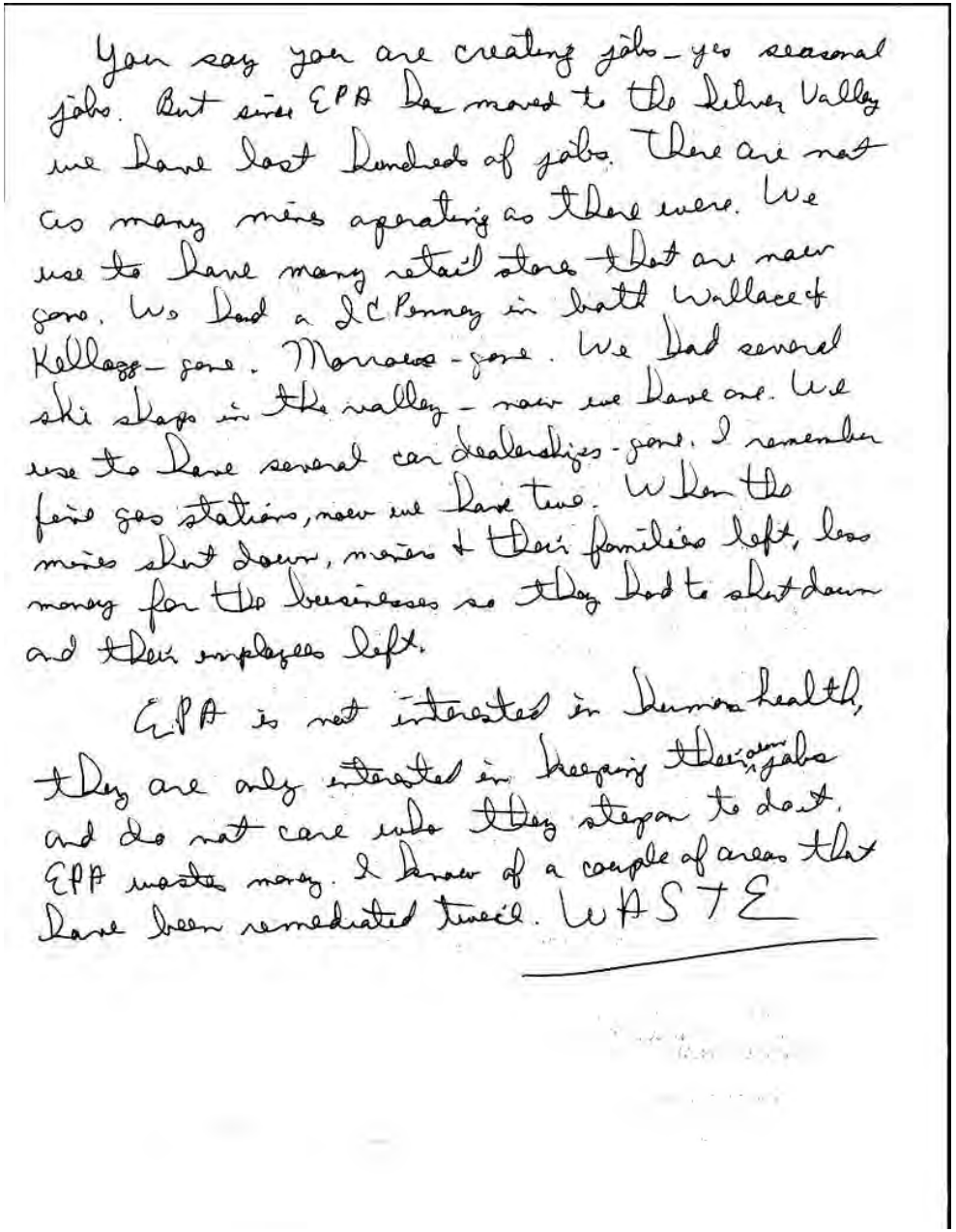
Response to comment I110-1
See response to Comment No. I58-1.

Response to comment I110-2
See response to Comment No. I58-2.

Response to comment I110-3
See response to Comment No. I58-3.

Response to comment I110-4
See response to Comment No. I58-4.

Response to comment I110-5
See response to Comment No. I58-5.

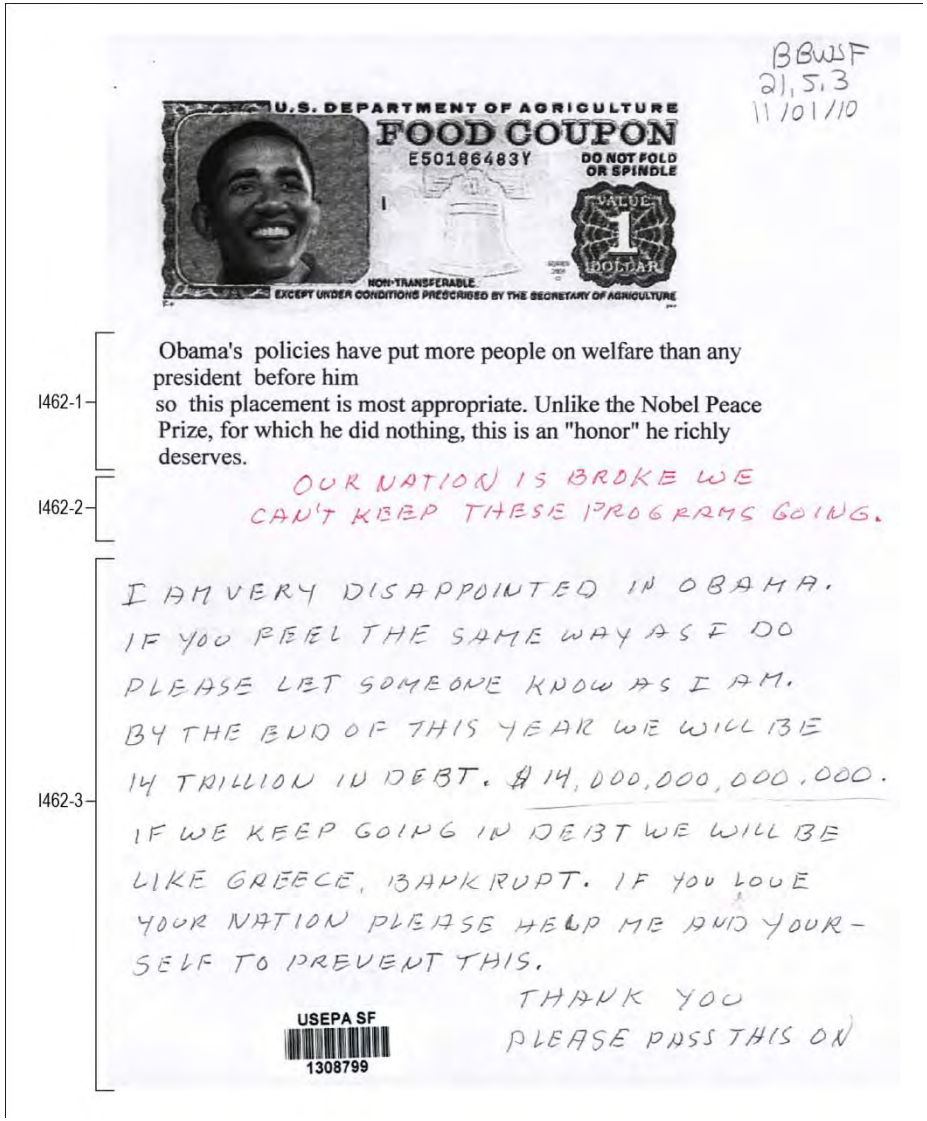


You say you are creating jobs – yes seasonal jobs. But since EPA has moved to the Silver Valley we have lost hundreds of jobs. There are not as many mines operating as there were. We use to have many retail stores that are now gone. We had a JC Penney in both Wallace & Kellogg – gone. Montgomery Wards – gone. We had several ski shops in the valley – now we have one. We use to have several car dealerships – gone. I remember five gas stations, now we have two. When the mines shut down, miners & their families left, less money for the businesses so they had to shut down and their employees left.

EPA is not interested in human health, they are only interested in keeping their jobs and do not care who they step on to do it. EPA wastes many. I know of a couple of areas that have been remediated twice. WASTE

No comments

Lukesh, Ronald, I462, Letter 1308799



I462-1

I462-2

I462-3

Response to comment I462-1

Comment noted.

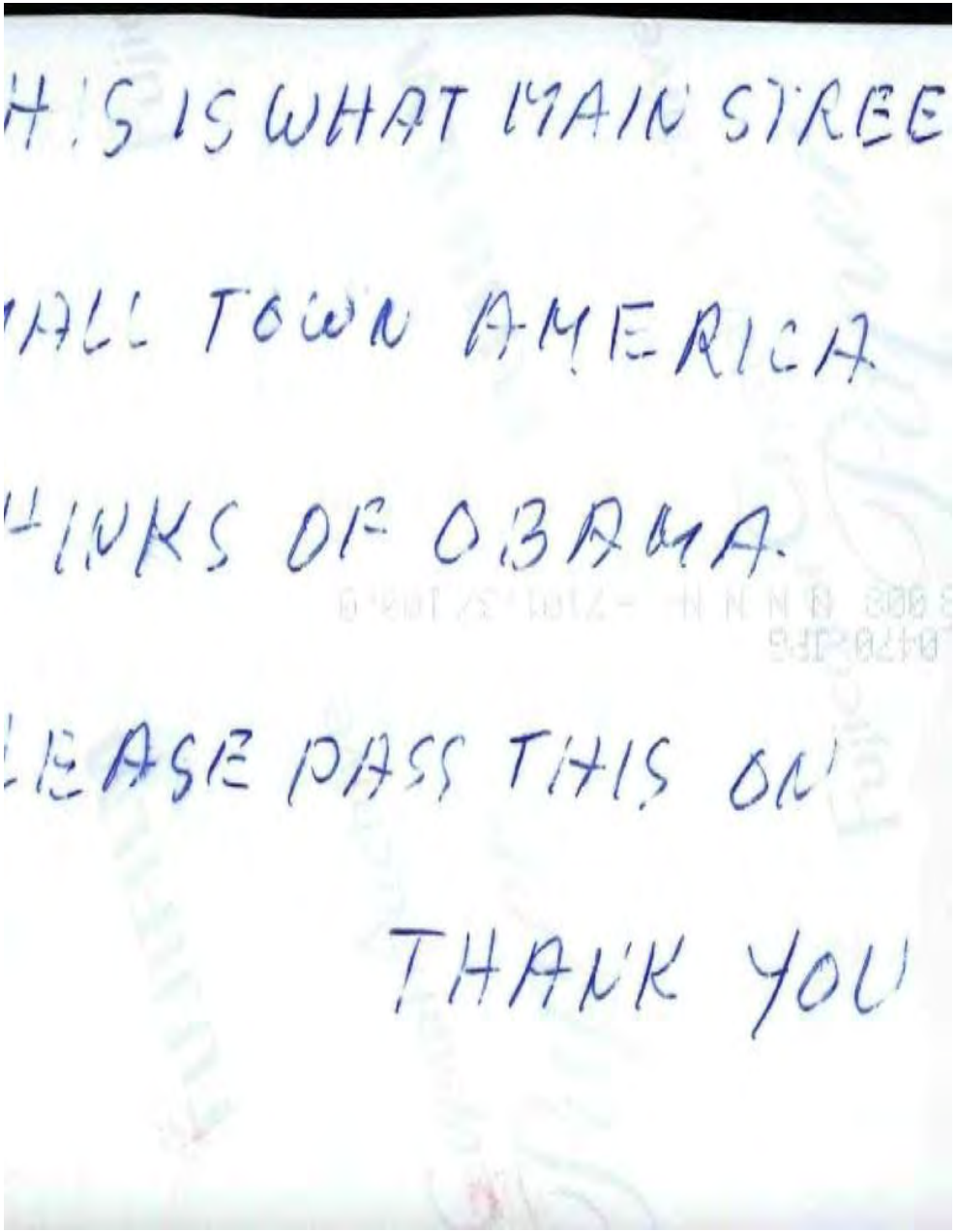
Response to comment I462-2

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. With regard to funding see response to Comment No. I295-3.

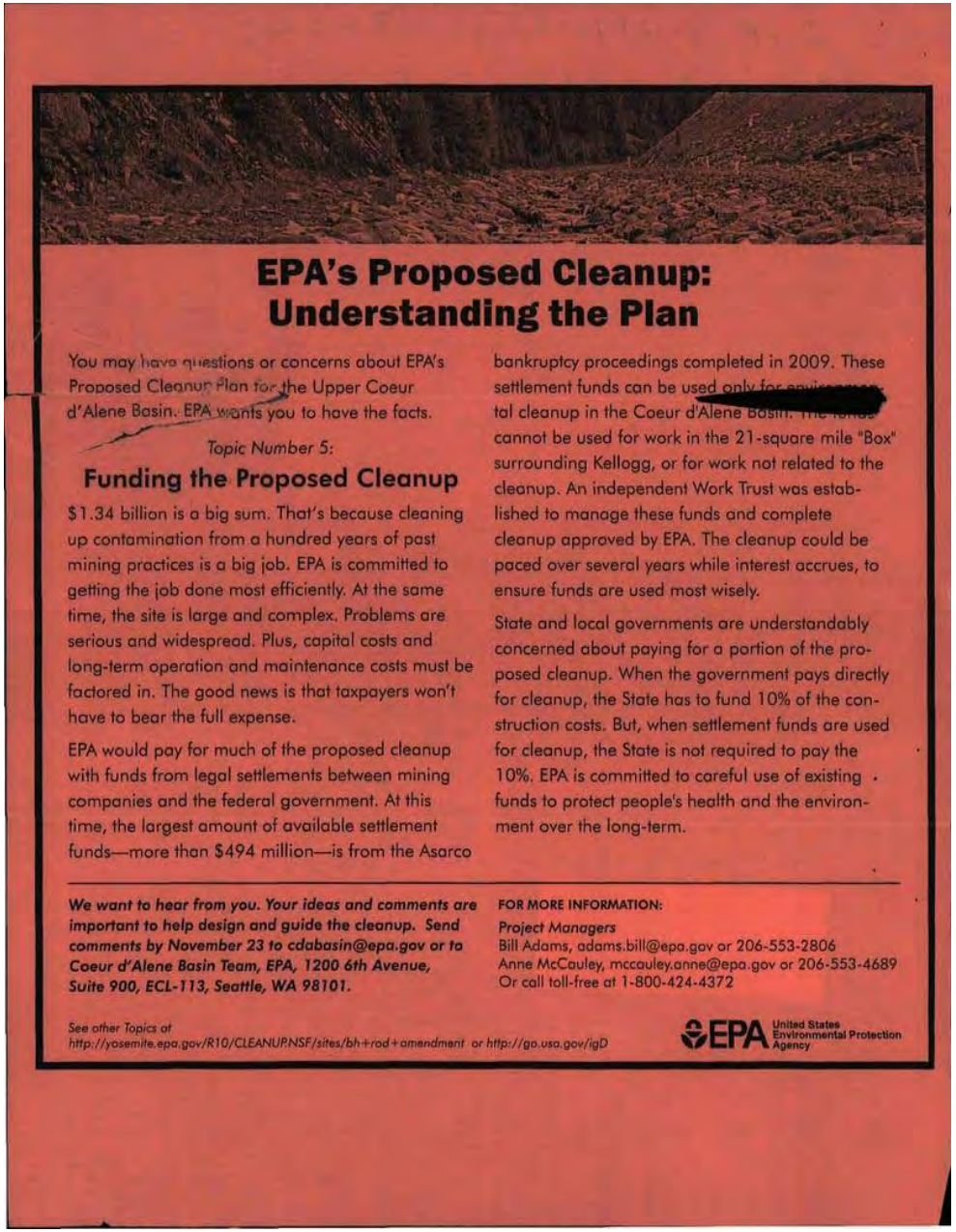
Response to comment I462-3

Comment noted.

No comments


H IS IS WHAT MAIN STREE
ALL TOWN AMERICA
LINKS OF OBAMA.
LEASE PASS THIS ON
THANK YOU

No comments



EPA's Proposed Cleanup: Understanding the Plan

You may have questions or concerns about EPA's Proposed Cleanup Plan for the Upper Coeur d'Alene Basin. EPA wants you to have the facts.

Topic Number 5:

Funding the Proposed Cleanup

$1.34 billion is a big sum. That's because cleaning up contamination from a hundred years of past mining practices is a big job. EPA is committed to getting the job done most efficiently. At the same time, the site is large and complex. Problems are serious and widespread. Plus, capital costs and long-term operation and maintenance costs must be factored in. The good news is that taxpayers won't have to bear the full expense.

EPA would pay for much of the proposed cleanup with funds from legal settlements between mining companies and the federal government. At this time, the largest amount of available settlement funds—more than $494 million—is from the Asarco bankruptcy proceedings completed in 2009. These settlement funds can be used only for environmental cleanup in the Coeur d'Alene Basin. The funds cannot be used for work in the 21-square mile "Box" surrounding Kellogg, or for work not related to the cleanup. An independent Work Trust was established to manage these funds and complete cleanup approved by EPA. The cleanup could be paced over several years while interest accrues, to ensure funds are used most wisely.

State and local governments are understandably concerned about paying for a portion of the proposed cleanup. When the government pays directly for cleanup, the State has to fund 10% of the construction costs. But, when settlement funds are used for cleanup, the State is not required to pay the 10%. EPA is committed to careful use of existing funds to protect people's health and the environment over the long-term.

We want to hear from you. Your ideas and comments are important to help design and guide the cleanup. Send comments by November 23 to cdabasin@epa.gov or to Coeur d'Alene Basin Team, EPA, 1200 6th Avenue, Suite 900, ECL-113, Seattle, WA 98101.

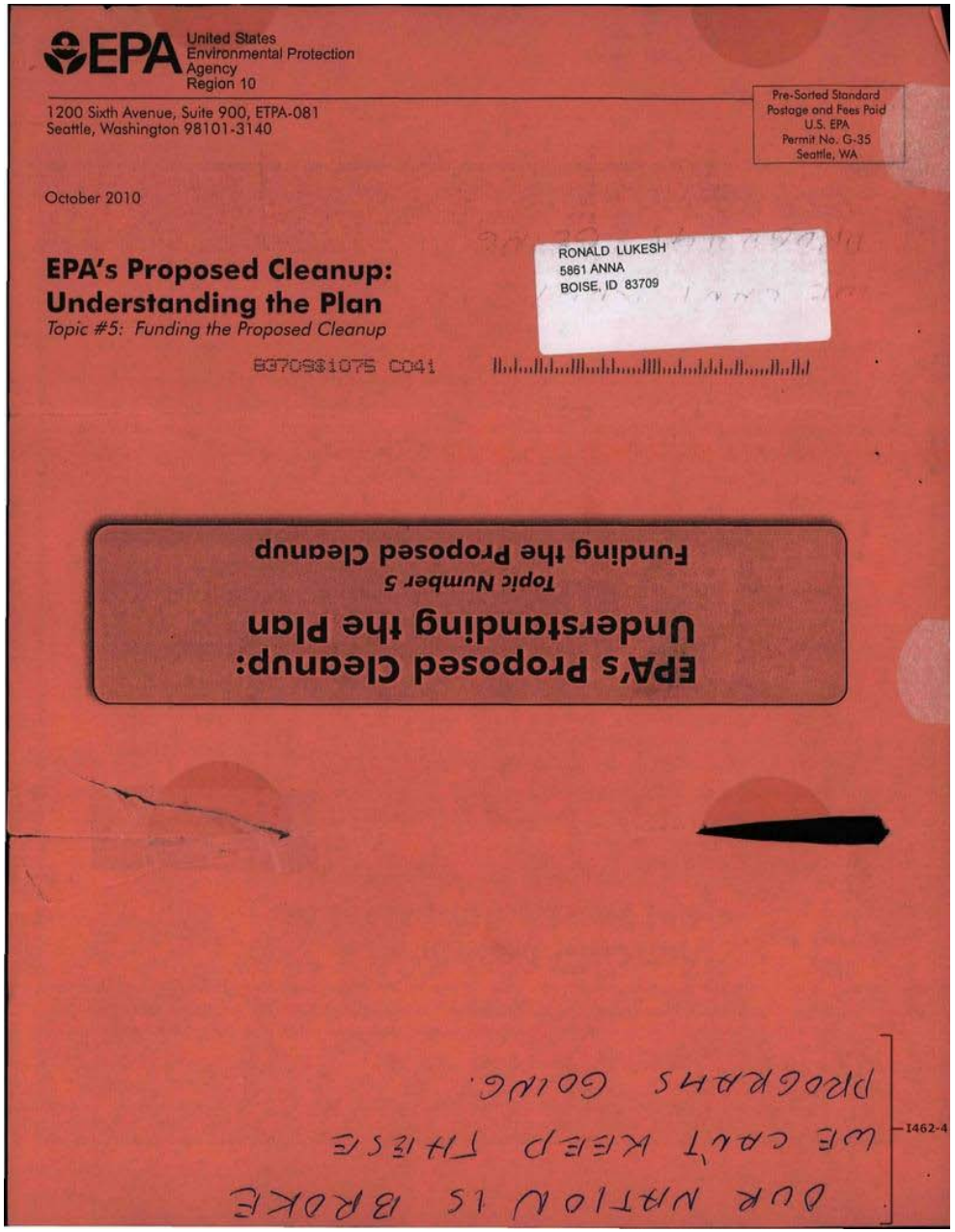
FOR MORE INFORMATION:

Project Managers
Bill Adams, adams.bill@epa.gov or 206-553-2806
Anne McCauley, mccauley.anne@epa.gov or 206-553-4689
Or call toll-free at 1-800-424-4372

See other Topics at
http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/bh+rod+amendment or http://go.usa.gov/igD

EPA United States Environmental Protection Agency

No comments


EPA United States Environmental Protection Agency Region 10

1200 Sixth Avenue, Suite 900, ETPA-081
Seattle, Washington 98101-3140

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U.S. EPA
Permit No. G-35
Seattle, WA

October 2010

EPA's Proposed Cleanup: Understanding the Plan

Topic #5: Funding the Proposed Cleanup

RONALD LUKESH
5861 ANNA
BOISE, ID 83709

83709$1075 C041

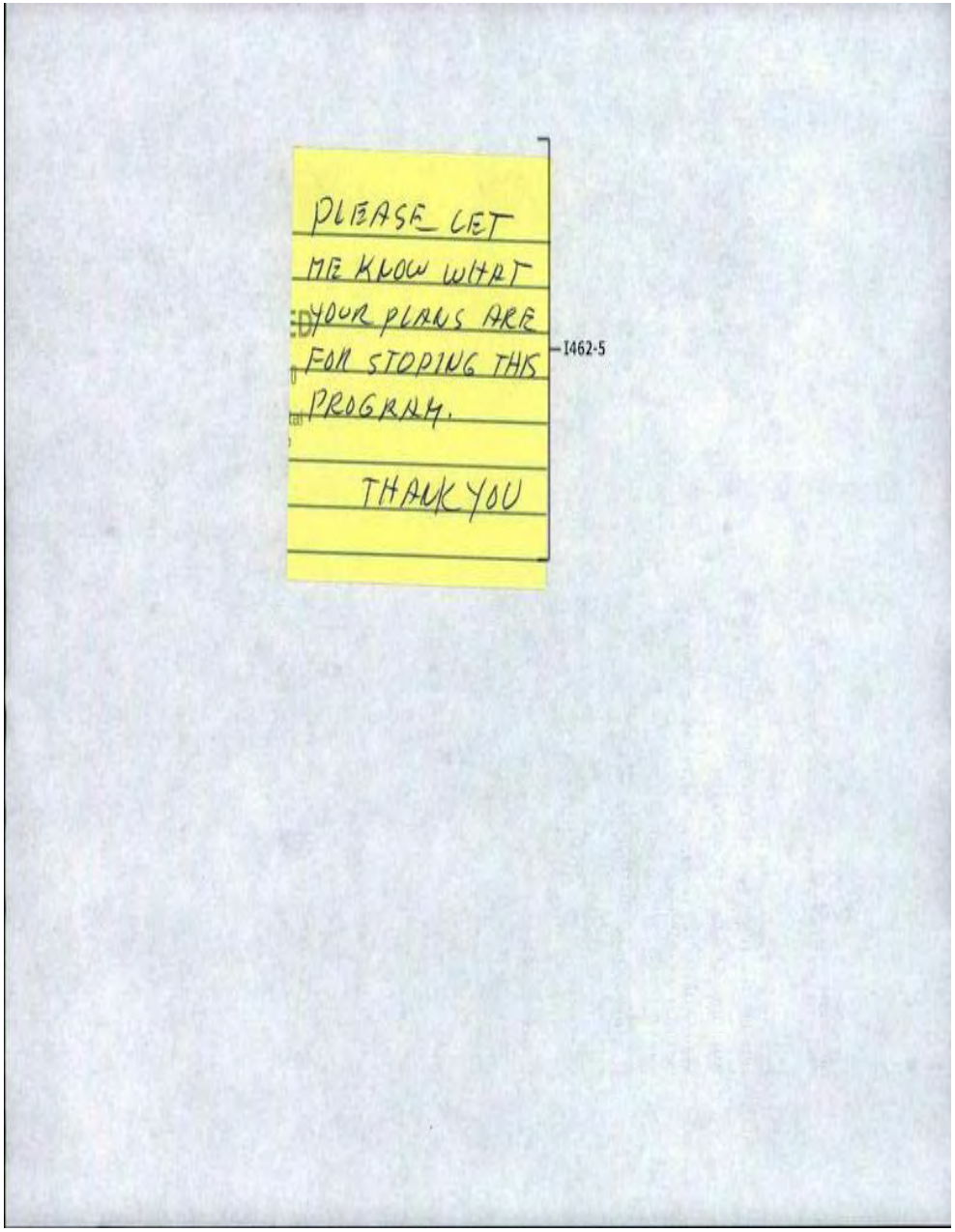
Funding the Proposed Cleanup
Topic Number 5
Understanding the Plan
EPA's Proposed Cleanup:

OUR NATION IS BROKE
WE CAN'T KEEP THESE
PROGRAMS GOING.

I462-4

Response to comment I462-4

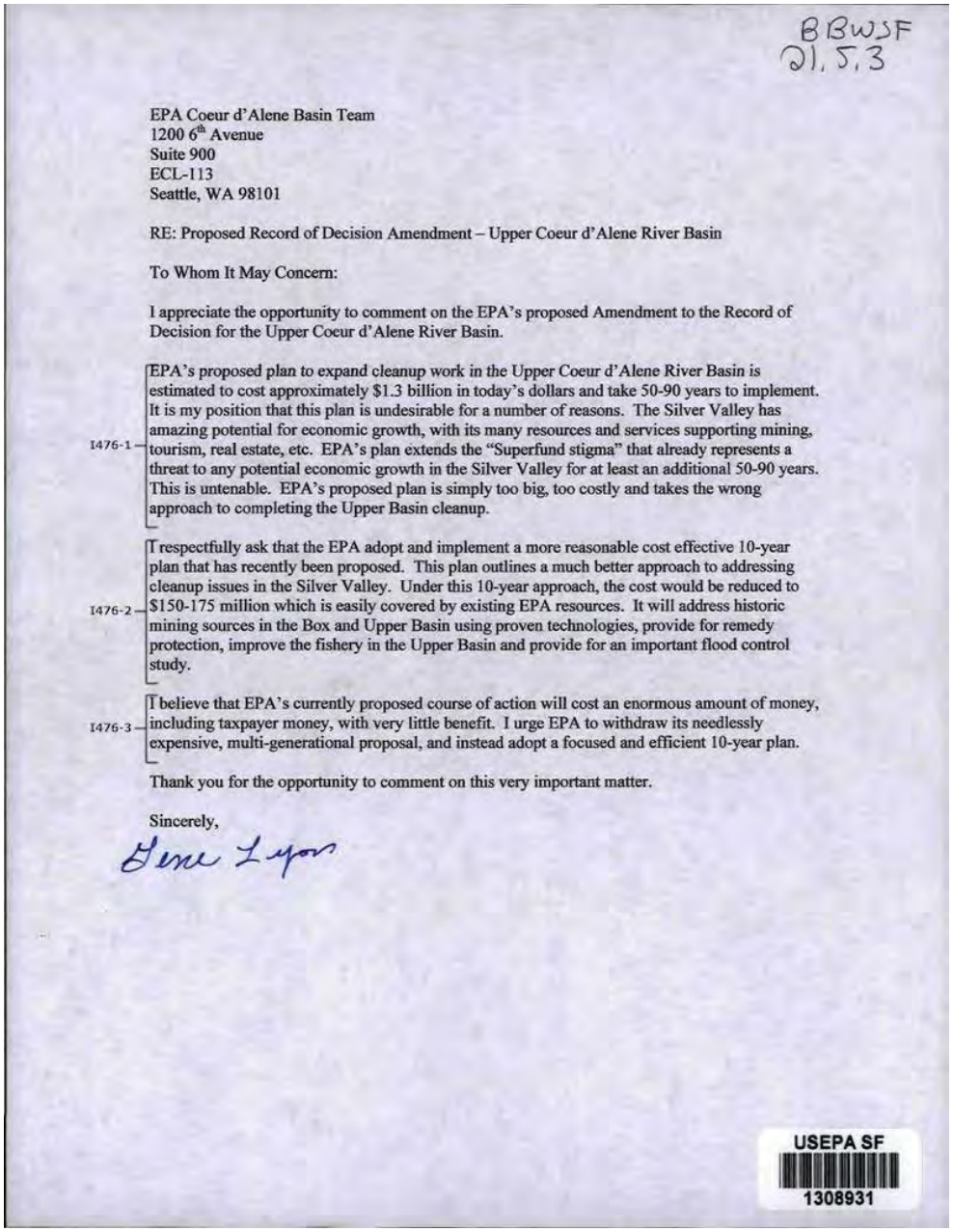
See response to comment I295-3. Taxpayer dollars used to fund the cleanup, if any, will augment settlement funds.



Response to comment I462-5

Comment noted. See response to Comment No. I58-1.

Lyon, Gene, I476, Letter 1308931



BBWSF
21, 5, 3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I476-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I476-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I476-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Gene Lyon

USEPA SF
1308931

Response to comment I476-1

See response to Comment No. I474-1.

Response to comment I476-2

See response to Comment No. I474-2.

Response to comment I476-3

See response to Comment No. I474-3.

Lyons, Doug, I398, Letter 616293

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
dlyons123@aol.com to: formsubmission 11/11/2010 08:16 AM
Sent by: Dlyons123@Aol.Com <dlyons123=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Doug Lyons
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I feel this is just another form of government intrusion into the lives of its citizens.
Coeur d'Alene Basin Resident: No
Email Address: dlyons123@aol.com
Mailing Address: 16255 Viginia Pt Rd NE|Poulsbo|WA|98370|US
Phone Number:

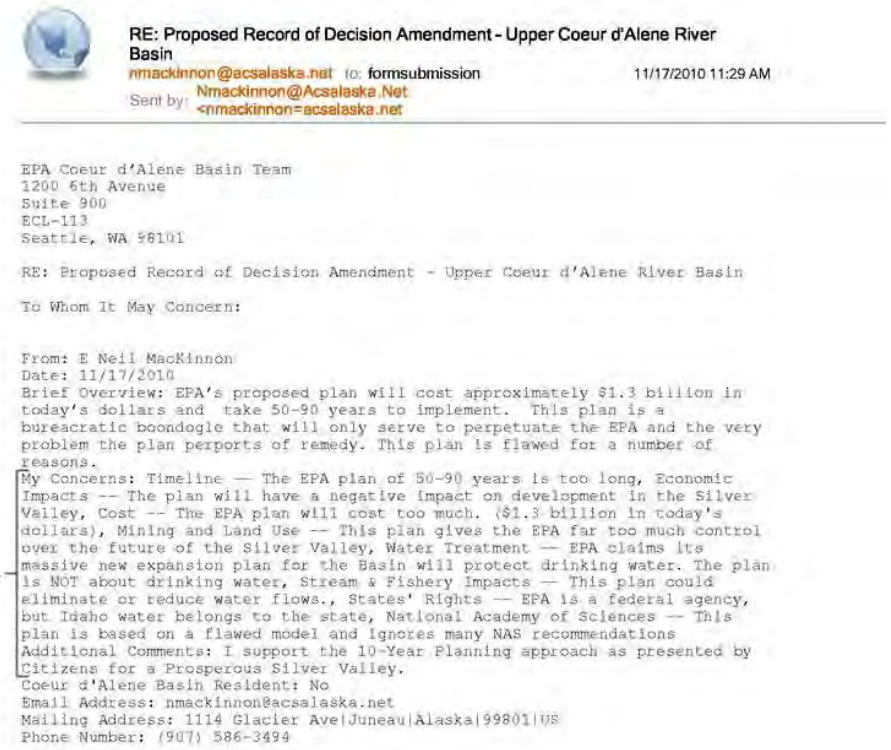
I398-1

616293

Response to comment I398-1

See response to Comment No. I351-1.

MacKinnon, E. Neil, I684, Letter 618294



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
nmackinnon@acsalaska.net to: formsubmission 11/17/2010 11:29 AM
Sent by: NmacKinnon@Acsalaska.Net <nmackinnon=acsalaska.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

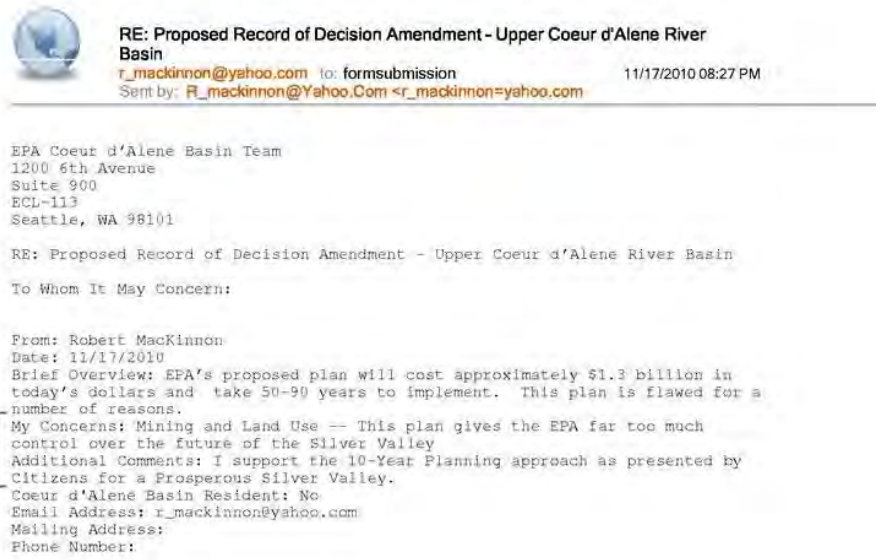
From: E Neil MacKinnon
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is a bureacratic boondogle that will only serve to perpetuate the EPA and the very problem the plan perports of remedy. This plan is flawed for a number of reasons.
I684-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: nmackinnon@acsalaska.net
Mailing Address: 1114 Glacier Ave|Juneau|Alaska|99801|US
Phone Number: (907) 586-3494

618294

Response to comment I684-1

See response to Comment No. I351-1.

MacKinnon, Robert, I683, Letter 618293



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

r_mackinnon@yahoo.com to: formsubmission 11/17/2010 08:27 PM
Sent by: R_mackinnon@Yahoo.Com <r_mackinnon=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Robert MacKinnon
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I683-1 My Concerns: Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: r_mackinnon@yahoo.com
Mailing Address:
Phone Number:

618293

Response to comment I683-1

See response to Comment No. I351-1.

Macomber, Art, I579, Letter 617760

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November 23, 2010

Send by Email Only

TO: Bill Adams: adams.bill@epa.gov; Anne Dailey: dailey.anne@epa.gov;
Anne McCauley: mccauley.anne@epa.gov

FROM: Art Macomber, Attorney at Law[1]

RE: Pending EPA ROD Amendment[2] and North Idaho Adjudication[3]

Good morning,

I579-1 I have posited and attempted to answer the below stated question. My research leads me to more questions, which I believe require addressing prior to EPA settling on the Proposed Plan for the Upper Basin of the Coeur d'Alene River system. I appreciate your review and reply to my

I579-2 concerns. When the Coeur d'Alene Chamber of Commerce Public Policy Committee was visited by EPA personnel a couple of weeks ago, I was told that since CERCLA requires no permits for its work, that the water rights presently being adjudicated are a separate issue that the EPA need not address. I do not agree with this assessment.

I579-3 Without a complete Idaho Department of Water Resources (IDWR) Director's Report, the hydrology alterations in the Proposed Plan may adversely impact existing water rights. This is true whether or not EPA itself is required to obtain State IDWR permits for the water diversions it plans for the CERCLA work. I believe there may be jurisdictional questions too, given the McCarren Amendment as discussed below, and suggest EPA obtain the Idaho CSRBA Court's approval for the Proposed Plan prior to undertaking any action in Basin 94.

I579-4 [1] Art Macomber is a licensed Idaho real property and water law attorney. Disclaimer: This letter is designed to be a starting point for further research, is being offered *pro bono*, no attorney-client relationship depends on its contents, and it should not be relied upon as a complete statement of the law on this question. Minimal case law was reviewed regarding the matters discussed herein.

[2] http://yosemite.epa.gov/r10/cleanup.nsf/sites/bhr/rod_amendment, accessed 11/5/10. The full title for the plan is *Proposed Plan for the Upper Basin of the Coeur d'Alene River Bunker Hill Mining and Metallurgical Complex Superfund Site*, here UBPP.

[3] http://www.idwr.idaho.gov/WaterManagement/NorthIdahoAdjudication.htm, accessed 11/5/10.

Letter to EPA re: Proposed Plan for Upper Basin of Coeur d'Alene River System

617760

Response to comment I579-1

Thank you for your comments.

Response to comment I579-2

EPA received notice of the Northern Idaho Adjudication in August of 2011. However, and consistent with the terms of the notice, EPA is not yet required to participate in the adjudication since any permit application EPA may submit would be filed after November 12, 2008, the cut-off date for requiring participation in the adjudication. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I579-3

See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I579-4

Comment noted.

Question Presented: Whether the Environmental Protection Agency ("EPA"), to perform remedial activities pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980[4] ("CERCLA") in the watershed Basin 94 currently involved in the McCarren Amendment-authorized Coeur d'Alene Spokane River Basin Adjudication ("CSRBA"), must submit its Amended Record of Decision ("ROD") Upper Basin Proposed Plan ("UBPP") to the Idaho State Water Court for review and approval prior to undertaking such remedial activities?

Short Answer: Yes, probably, because the federal government has already ceded jurisdiction to Idaho in that Basin and the remedial activities may injure existing water rights holders. The Idaho Department of Water Resources ("IDWR") Director's Report for the Basin is not yet issued, and thus it is impossible to presently determine what commercial, manufacturing, mining, or other water rights may be injured by EPA's remediation. Further, the deferral of the filing of *de minimis* domestic and stock water rights as allowed pursuant to a stipulation to which the federal government is a party allows such water rights to remain unknown, unaccounted for, and unassessed in the required CERCLA health assessments performed prior to the planned extensive hydrological CERCLA-required EPA remediation plans.

Discussion: EPA's proposed UBPP[5] includes "a holistic approach . . . to address contamination in the Upper Basin . . . [and] present[s] a comprehensive remedy . . .." (UBPP, p. v.) The proposed ten (10) remedial options "address the widespread contamination that impacts surface water and other media in the Upper Basin." (Id.) Highlights of the remedial actions included in the Preferred Remedial Alternative **outside the Box** are:

- Extensive excavation of waste rock, tailings, and floodplain sediments;
- Remedial actions along stream reaches to reduce the flow of contaminated groundwater into the SFCDR[6] and its tributaries;

[4] http://www.epa.gov/superfund/policy/cercla.htm, accessed Nov. 5, 2010. Codified at Title 42, United States Code ("U.S.C."), Chapter 103, Subchapter 1, Section 9601, et seq., see http://frwebgate.access.gpo.gov/cgi-bin/usc.cgi?ACTION=BROWSE&TITLE=42USCC103, accessed 11/5/10.
[5] http://www.epa.gov/region10/pdf/sites/bunker_hill/upper_basin_final_pp_0710.pdf, accessed 11/5/10.
[6] South Fork of the Coeur d'Alene River, as abbreviated in the UBPP.

No comments

- Capping, regrading, and revegetation of tailings and waste rock areas;
- Collection and treatment of contaminated adit discharges, seeps, and groundwater; and
- Stream and riparian cleanup actions in every major Upper Basin watershed.

Highlights of remedial actions included in the Preferred Remedial Alternative **in the Box** are:

- Remedial actions to reduce the flow of contaminated groundwater entering the SFCDR; and
- Collection and treatment of groundwater and water management actions to reduce the flow of contaminated adit discharges near the Reed and Russell Mines.

(Id. pp. vi-vii.)

EPA states it will "develop and modify the Implementation Plan **in close cooperation with state agencies**, other federal agencies, Tribal representatives, and other involved parties including the Basin Commission, community representatives, and the Coeur d'Alene Basin Natural Resource Trustees." (Id. p. ix; emphasis added.) However, the word "adjudication" does not even appear in the ROD Amendment's UBPP, thus it ignores the ongoing CSRBA.

The UBPP acknowledges:

> A deep groundwater aquifer and clean surface water tributaries are used as drinking water sources in the Upper Basin. Within the Basin, approximately 57 percent of residences obtain water from public sources and 43 percent obtain water from private sources. In 1989, the Idaho Department of Water Resources (IDWR) established an Area of Drilling Concern for groundwater within the 21-square-mile Bunker Hill Box area to protect public health in recognition of the existing groundwater contamination.

While in 1989 the IDWR established special conditions for groundwater drilling, the CSRBA did not begin until November 12, 2008.[7] The federal government ceded jurisdiction to Idaho for the CSRBA pursuant to the McCarren Amendment (43 U.S.C. 666[8]), and stipulated to the

[7] http://www.idwr.idaho.gov/WaterManagement/NorthIdAdju/CourtDocs/PDFs/20081112_Commencement_Order.pdf, accessed 11/5/10.

[8] § 666. **Suits for adjudication of water rights**. (a) Joinder of United States as defendant; costs. Consent is given to join the United States as a defendant in any suit (1) for the adjudication of rights to the use of water of a river system or other source, or (2) for the administration of such rights, where it appears that the United States is the owner of or is in the process of acquiring water rights by appropriation under State law, by purchase, by exchange, or otherwise, and the United States is a necessary party to such suit. The United States, when a party to any such suit, shall (1) be deemed to have waived any right to plead that the State laws are inapplicable or that the United States is not amenable thereto by reason of its sovereignty, and (2) shall be subject to the judgments, orders, and decrees of the court having jurisdiction, and may obtain review thereof, in the same manner and to the same extent as a private individual under like circumstances: Provided, That no judgment for costs shall be entered against the United States in any such suit.

No comments

deferral of the filing of *de minimis* domestic and stock water water rights in the basin.[9] Therefore, EPA's UBPP cannot account for existing but as yet unfiled for water rights within the CSRBA where it undertakes remedial actions, because of the federal executive branch's stipulation to allow deferral of *de minimis* domestic and stock water rights within that basin. EPA's remedial actions may or may not injure such water rights, or commercial, manufacturing, or agricultural water rights yet unfiled and thus unknown.

EPA's ROD Amendment takes remedial action affecting significant watershed flows in the SFCDR, Canyon Creek, Ninemile Creek, Big Creek, Moon Creek, Pine Creek, and the main stem of the SFCDR not flowing within the Bunker Hill Box.[10] (UBPP, p. 3-4.) A few specific remedial acts, although certainly not all such acts that may injure CSRBA water rights holders include[11]:

- OU[12] 2 Alternative (a): Minimal Stream Lining. OU 2 Alternative (a) consists of limited stream-lining actions in losing reaches of OU 2 streams to reduce recharge to the shallow alluvial groundwater system.
- OU 2 Alternative (b): Extensive Stream Lining. OU 2 Alternative (b) consists of extensive stream-lining actions in OU 2 streams to reduce recharge to the shallow alluvial groundwater system. Groundwater cutoff walls would be installed at select locations as part of this alternative.
- OU 2 Alternative (c): French Drains. OU 2 Alternative (c) consists of a French drain system located in the central portion of OU 2, along the northern end of the CIA in the area with the highest dissolved metals load gains observed in the SFCDR. This French drain system would intercept dissolved-metals-contaminated groundwater prior to discharging to the SFCDR.
- OU 2 Alternative (d): Stream Lining/French Drain Combination. OU 2 Alternative (d) consists of French drains, stream linings, cutoff walls, and extraction wells located in the central portion of OU 2, primarily in the area with the highest dissolved metals load gains observed in the SFCDR.
- OU 2 Alternative (e): Extensive Stream Lining/French Drain Combination. OU 2 Alternative (e) is the most extensive water collection and management alternative,

[9] Order Establishing Procedures For The Adjudication of De Minimis Domestic and Stock Water Rights in the [CSRBA] at http://www.idwr.idaho.gov/WaterManagement/NorthIdAdju/CourtDocs/PDFs/20081112_Order.pdf, accessed 11/5/10.
[10] "[A] rectangular 21-square-mile area surrounding the former smelter complex." (Rod Am. p. iii.)
[11] All alternatives, except the last, are edited here. For full outline of each see the UBPP at pp. 7-8 and 7-9.
[12] "[ ]EPA has identified three **Operable Units** (OUs) at the Bunker Hill Superfund Site. OU 1 (Populated Areas) and OU 2 (Non-Populated Areas) are located in the Upper Basin within the Bunker Hill 'Box,' a rectangular 21-square-mile area surrounding the former smelter complex. OU 3 includes all areas of the Coeur d'Alene Basin outside the Bunker Hill Box where mining-related contamination is located. OU 3 extends from near the Idaho-Montana border into the State of Washington, and includes floodplains, communities, lakes, rivers, and tributaries." (UBPP, p. iv.)

No comments

incorporating extensive stream lining of the SFCDR and its tributaries, as well as French drain systems. Actions would include lining of the SFCDR and Bunker, Government, Deadwood, Magnet, Grouse, and Humbolt Creeks; installing a French drain along the northern end of the CIA in the area with the highest dissolved metals load gains observed in the SFCDR, as in OU 2 Alternatives (c) and (d), and conveying the collected water to the CTP for treatment; installing a French drain extending from mid-Smelterville Flats west to the Pinehurst Narrows, and conveying the collected water to the CTP for treatment; installing slurry walls and extraction wells upgradient of tributary liners (except Bunker Creek) to guide groundwater into the lined channels; installing slurry walls and extraction wells across the SFCDR valley floor at Elizabeth Park and Pinehurst Narrows (slurry wall only); and phased implementation of the Reed and Russell Adit Tunnel actions discussed above. An estimated average flow of 2,400 gpm of contaminated groundwater would be treated at the CTP (in addition to current flows of AMD from the Bunker Hill Mine and waters to be added from OU 3).

The remediation envisioned includes longterm significant alteration of existing hydrology, including diversion of entire river reach flows, which diversions may be themselves water rights appropriations[13], or may impact other water rights holders in the CSRBA to an unknown and unconsidered extent. To allow implementation of the UBPP without such consideration may result in significant injury to existing water rights holders in IDWR Basins 94 and 95.

CERCLA provides jurisdiction and venue provisions for challenges to that law or actions taken pursuant to it. (42 U.S.C. § 9613.) The EPA is required to "provide for the participation of interested persons, including potentially responsible parties, and the development of the administrative record on which the [EPA] will base the selection of remedial actions and on which judicial review of remedial actions will be based." (Id. at § 9613(k)(2)(B).) Also, the EPA is required to "promptly notify the appropriate . . . State natural resource trustees of potential damages to natural resources resulting from releases under investigation . . . and shall seek to coordinate the assessments, investigations, and planning . . . with such . . . trustees." (Id. at § 9604(b)(2).) It is very likely that in addition to IDWR, the Idaho State Water Court[14]

[13] Idaho Code § 42-101, in pertinent part: "All the waters of the state, when flowing in their natural channels, including the waters of all natural springs and lakes within the boundaries of the state are declared to be the property of the state, whose duty it shall be to supervise their appropriation and allotment to those diverting the same therefrom for any beneficial purpose, ..." No interpretation is offered here as to whether EPA's remedial diversions for the beneficial purpose of cleaning the water constitute appropriation under Idaho law, but further research and CSRBA interpretation of State law should be considered by State and federal agencies prior to remediation activities taking place.

[14] See Provisional Order, 9/29/06: "[S]pecial jurisdiction for these general adjudications resides in the Snake River Basin Adjudication District Court of the Fifth Judicial District of the State of Idaho." Accessed 11/5/10 at http://www.idwr.idaho.gov/WaterManagement/NorthIdAdju/CourtDocs/PDFs/Provisional_Order.pdf.

No comments

exercising jurisdiction in the CSRBA would be considered a "State natural resource trustee." The EPA is required to consult with the affected State "before determining any appropriate remedial action." (Id. at § 9604(c)(2).) The geographic location of the UBPP is on CERCLA's National Priorities List ("NPL").[15] Since the word "adjudication" does not occur anywhere in the UBPP, it is likely EPA did not complete its required health assessment[16] for this project in conjunction with the Idaho State Water Court or IDWR for the purposes of evaluating potential injury to water rights. However, since the UBPP "contains a finding that the exposure concerned presents a significant risk to human health, [the EPA is required to] take such steps as may be necessary to reduce such exposure and eliminate or substantially mitigate the significant risk to human health[, including,] but not limited to (A) provision of alternate water supplies . . .." (Id. at § 9604(i)(11).) How can "such steps" happen without questions regarding the State's jurisdiction under the CSRBA and potential injury to water rights being resolved?

The EPA defines the word "**site**" expansively: "[t]he Upper Basin is part of the Bunker Hill Mining and Metallurgical Complex Superfund Site ('the Bunker Hill Superfund Site' or 'the Site')." (UBPP, p. iii; see *State of Ohio v. U.S. E.P.A.*, 997 F.2d 1520, 1548-1551 (D.C. Cir. 1993)("statutory scheme is meant to transcend artificial geographical and legal distinctions in order to facilitate remedial action" but "the ability of the statute to accommodate a broader, more functional definition of 'onsite' is not limitless.")

As described in the UBPP, the entire "site" includes all populated and unpopulated geographic areas of the Coeur d'Alene Basin inside and outside of the Bunker Hill Box where mining-related contamination is located, including from near the Idaho-Montana border into the State of Washington. (UBPP, p. iv.) This area includes floodplains, communities, lakes, rivers, and tributaries. (Id.) But, the UBPP planned remediation only includes the Upper Basin portion. (Id., p. iii.) However, the UBPP's envisioned alteration of significant streamflows in the Upper Basin portion likely impacts the entire "site" to the Washington border, including Coeur d'Alene Lake and the Spokane River, due to the hydrological connectedness of the Basins 94

[15] 42 U.S.C. § 9604(i)(2)(A).
[16] 42 U.S.C. § 9604(i)(6)(A).

No comments

and 95 within which the CSRBA is taking place. The thousands of water rights holders within the UBPP "site" should enjoy the protection of their water rights from potential injury by EPA's remediation activities, which can only be accomplished by review and approval of the UBPP by the Idaho State Water Court after such water rights have been filed for and listed in the Director's Report for Basins 94 and 95 in the CSRBA. This argues either against deferral of *de minimis* domestic and stock water rights in those two Basins, or the deferral of the implementation of the UBPP until such water rights become known and injuries thereto by UBPP implementation can be evaluated and adjudicated in the CSRBA.

Some may argue no evaluation or approval by the Idaho State Water Court is required, because "[n]o Federal, State, or local permit shall be required for the portion of any removal or remedial action conducted entirely onsite, where such remedial action is selected and carried out in compliance with [42 U.S.C. § 9621]." (42 U.S.C. § 9621(e)1).) However, "[t]he [EPA] shall promulgate regulations providing for **substantial and meaningful involvement by each State** in initiation, development, and selection of remedial actions to be undertaken in that State." (Id. at § 9621(f)(1) (emphasis added.) This requirement very likely includes evaluation and approval by the Idaho State Water Court, especially since the UBPP takes place entirely within Basin 94, and significantly affects Basin 95 hydrogology within the presently ongoing CSRBA, which involves thousands of surface and groundwater users under that Court's jurisdiction, including jurisdiction over the federal government's water rights pursuant to the McCarran Amendment.

CONCLUSION

Significant legal questions about State CSRBA jurisdiction and injury to existing water rights are presented here for further investigation. The federal government has ceded jurisdiction to Idaho for the CSRBA related to its own water rights, such as those held by the Bureau of Land Management and the U.S. Forest Service, and potentially related to remedial diversions planned in the UBPP if those diversions are found under state law to be water rights. The latter presents an as yet unanswered legal question regarding the confluence of state and federal law, sovereignty issues related thereto, and the Republic's vertical separation of powers related to which sovereign, State or

No comments

federal has jurisdiction over resolution of that question. Further, remedial activities in Basin 94 may injure existing water rights holders in both Basins 94 and 95, and potentially water rights holders in the State of Washington, depending on many unknown factors, including acts of God like flooding over the term of the proposed remediation. The Idaho Department of Water Resources ("IDWR") Director's Report for the Basin is not yet issued for the CSRBA, and thus it is impossible to presently determine what commercial, manufacturing, mining, or other water rights may be injured, if any, by EPA's remediation. Further, the deferral of the filing of *de minimis* domestic and stock water rights as allowed pursuant to a stipulation to which the federal government is a party allows such water rights to remain unknown, unaccounted for, and unassessed in the required CERCLA health assessments performed prior to the planned extensive hydrological CERCLA-required EPA remediation plans.

This letter raises these questions for the purpose of allowing further investigation by others of the significant legal issues involved.

Thank you for your response to my concerns.

Sincerely,

Art Macomber
Attorney at Law

cc: Todd Christenson, Coeur d'Alene Chamber of Commerce
Katie Brodie, Office of the Idaho State Governor C. L. Otter

No comments

Macphee, Alan, I293, Letter 610334

Coeur d'Alene Basin cleanup
alanmacphee to: CDABasin 09/23/2010 04:26 PM

Dear EPA,

I293-1 I appreciate your extension of the schedule for public comment, and am glad to see that the agency and the citizenry are engaged in healthy discussion of the ROD.

I293-2 A native of the Silver Valley, I visited my grandmother right beneath the spewing Bunker stacks in what used to be Deadwood Gulch, eyes burning, throat rasping. I remember very well the denuded hillsides, the milky flow of the South Fork, the enormous piles of "black sand" in Kellogg, and the plume of tailings below Enaville that marked the end of the beauty of the Coeur d'Alene River.

I293-3 I am absolutely astonished that in my 53 years I have seen such a remarkable recovery. The greening of my home town, which I used to refer to as Mordor from Lord of the Rings, is evidence of many factors including the clean water act, increased corporate citizenship of the mining companies, and your own agency's ongoing cleanup efforts.

I293-4 This surprising recovery makes me very concerned about the magnitude and longevity of the proposed ROD. I doubt that it is possible to perceive, today, the best course of action twenty years from now, or even ten . . . much less one hundred. A ROD of much shorter duration, maybe ten years, would be much more prudent.

I293-5 I am also very pleased with the South Fork, which flows a short distance from the place where I grew up. The Agency's plan to divert certain stream flows to a treatment plant in Kellogg concerns me greatly. A significant decrease in the flow of the South Fork and some of its tributaries could damn their recoveries and confound four decades of slow, steady recovery.

I293-6 Finally, modern mining operations generally display exemplary stewardship of the environment in their production of minerals needed for green technologies and practically every other facet of modern living. Unless we want to collectively revert to a very primitive life, we need the minerals produced in the Silver Valley, and the people there need the jobs, healthcare insurance, and other benefits provided by the mining companies. I am concerned that EPA activities or sanctions may inhibit access of current or future mining operations in the Silver Valley.

I293-7 In summary, please consider (1) significantly decreasing the extent of time envisioned in the proposed ROD, (2) examining source treatment as an alternative to the potential devastation of decreased stream flows, and (3) I293-8
I293-9 providing solid assurance to mining operations now in the Valley that their current operations and exploration potential will not be adversely affected by the ROD.

In appreciation for the opportunity to comment,

Alan MacPhee
Coeur d'Alene, Idaho

610334

Response to comment I293-1
Comment noted.

Response to comment I293-2
Thank you for your comment.

Response to comment I293-3
Thank you for your comment.

Response to comment I293-4
See responses to Comment Nos. I58-1 and I58-4.

Response to comment I293-5
See response to Comment No. I54-8.

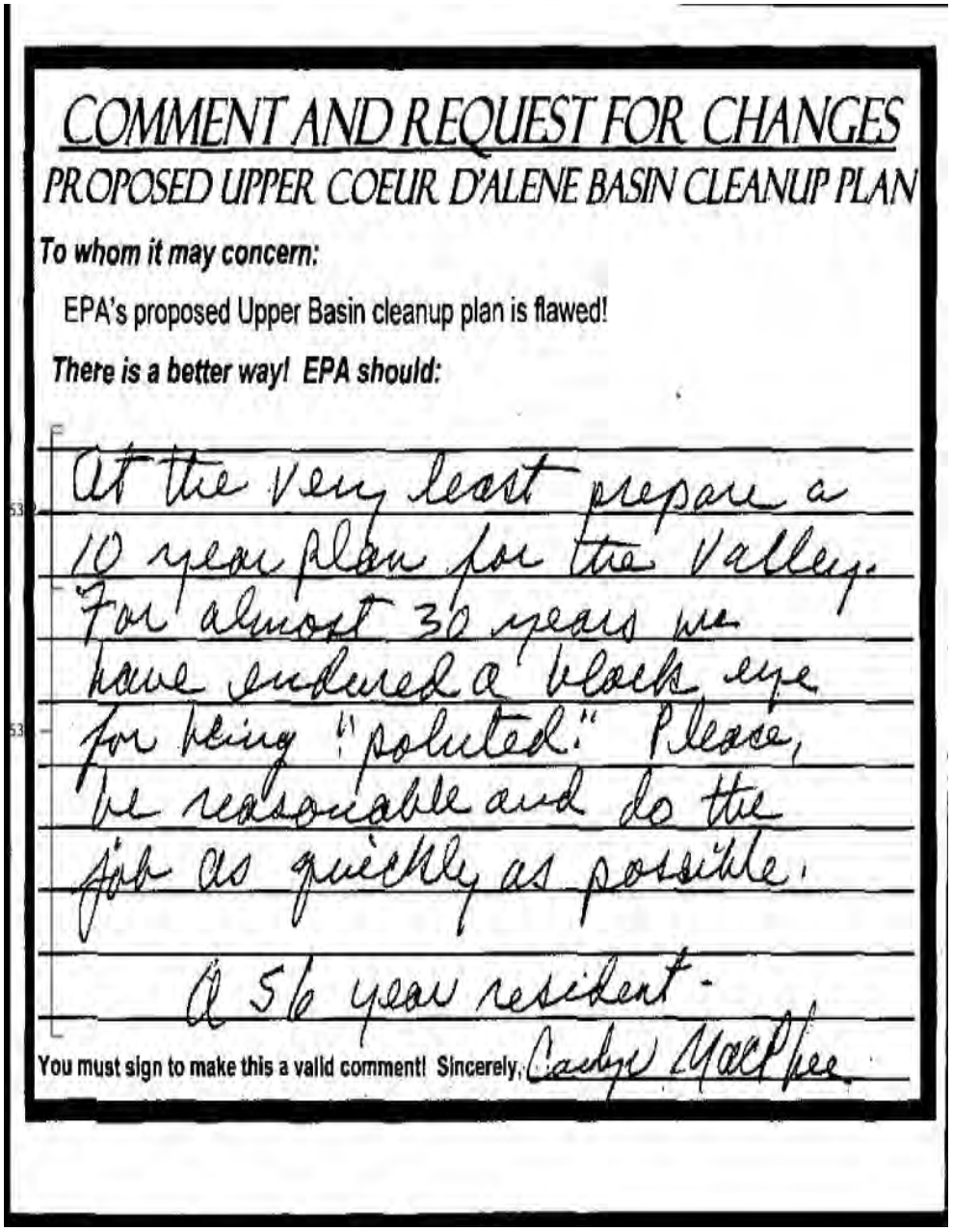
Response to comment I293-6
See response to Comment No. I58-5.

Response to comment I293-7
See response to Comment No. I58-1.

Response to comment I293-8
See response to Comment No. I54-8.

Response to comment I293-9
See response to Comment No. I58-5.

MacPhee, Carolyn, I453, Letter 1308790



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is flawed!

There is a better way! EPA should:

I532 At the very least prepare a 10 year plan for the Valley.
For almost 30 years we
I533 have endured a black eye
for being "polluted." Please,
be reasonable and do the
job as quickly as possible.

A 56 year resident.

You must sign to make this a valid comment! Sincerely, Carolyn MacPhee

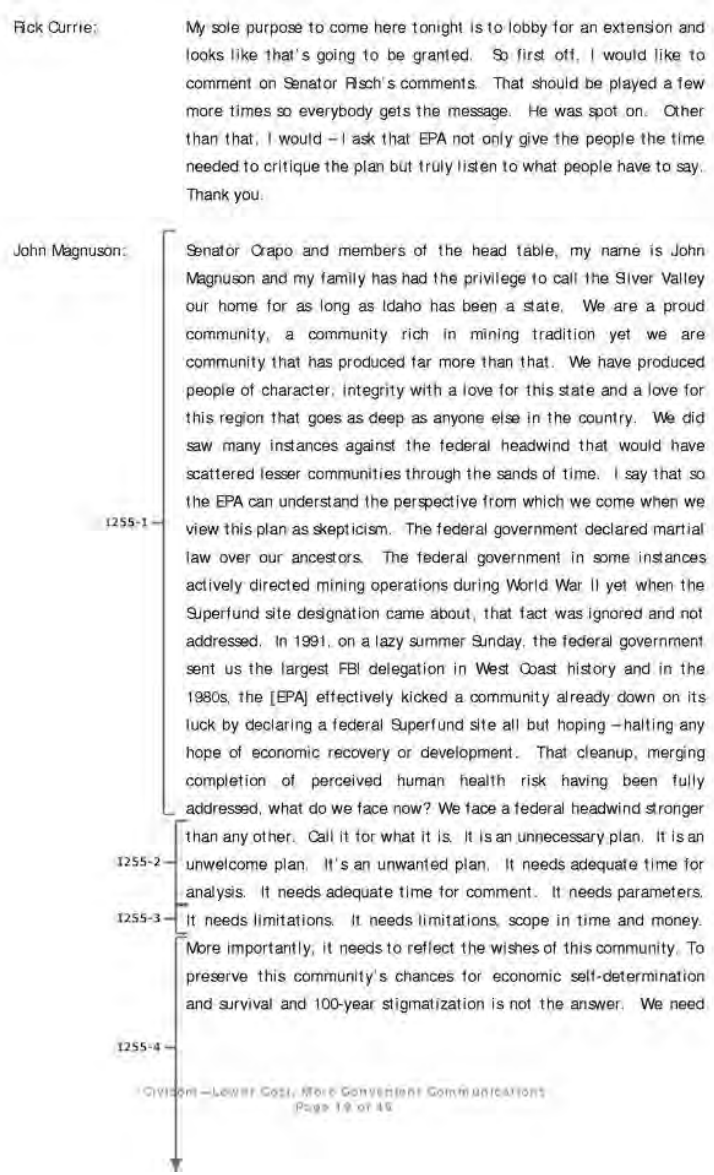
Response to comment I453-1

See responses to Comment Nos. I58-1 and I58-4.

Response to comment I453-2

See response to Comment No. I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. I474-2 regarding Hecla's proposed 10-Year Plan. EPA will be releasing a Draft Implementation Plan at the time the ROD Amendment is completed that will outline the planned cleanup actions for the next 10 years. This will be reviewed and discussed through the Basin Commission Process.

Magnuson, John, I255, Letter 616015-15



Rick Currie:

My sole purpose to come here tonight is to lobby for an extension and looks like that's going to be granted. So first off, I would like to comment on Senator Risch's comments. That should be played a few more times so everybody gets the message. He was spot on. Other than that, I would – I ask that EPA not only give the people the time needed to critique the plan but truly listen to what people have to say. Thank you.

John Magnuson:

Senator Crapo and members of the head table, my name is John Magnuson and my family has had the privilege to call the Silver Valley our home for as long as Idaho has been a state. We are a proud community, a community rich in mining tradition yet we are community that has produced far more than that. We have produced people of character, integrity with a love for this state and a love for this region that goes as deep as anyone else in the country. We did saw many instances against the federal headwind that would have scattered lesser communities through the sands of time. I say that so the EPA can understand the perspective from which we come when we

I255-1 view this plan as skepticism. The federal government declared martial law over our ancestors. The federal government in some instances actively directed mining operations during World War II yet when the Superfund site designation came about, that fact was ignored and not addressed. In 1991, on a lazy summer Sunday, the federal government sent us the largest FBI delegation in West Coast history and in the 1980s, the [EPA] effectively kicked a community already down on its luck by declaring a federal Superfund site all but hoping – halting any hope of economic recovery or development. That cleanup, merging completion of perceived human health risk having been fully addressed, what do we face now? We face a federal headwind stronger than any other. Call it for what it is. It is an unnecessary plan. It is an

I255-2 unwelcome plan. It's an unwanted plan. It needs adequate time for analysis. It needs adequate time for comment. It needs parameters.

I255-3 It needs limitations. It needs limitations, scope in time and money. More importantly, it needs to reflect the wishes of this community. To preserve this community's chances for economic self-determination and survival and 100-year stigmatization is not the answer. We need

I255-4

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Response to comment I255-1

See response to Comment No. I295-1.

Response to comment I255-2

See response to Comment No.LJ39-5.

Response to comment I255-3

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I255-4

See response to Comment No. I58-1.

1255-4

your help to ensure that when our generations to come, look back in a 100 years, they know that we too did not go quietly in the night.

Tom Parker: Good evening and thank you for the chance to speak. I'm a proud employee of US Silver, the other operating mine in the Valley. We directly provide about 250 well-paid permanent jobs. I think my first comment would be that as just been said earlier, it seems to me that the proposed ROD amendment is short on specifics and I question the need for all the actions that are put forward. My company owns and controls 14,000 acres here in the Valley. We think it has excellent exploration potential and in spite of the EPA's comments, to the contrary, I know from past experience in my long career that having EPA here will affect our ability to explore those lands. I think that the 50 to 90-year plan is laughable. Clearly, we need a much shorter time period. I believe that the amended ROD is rather vague. As someone who regularly gets permits, I know that if I went in and said I'm going to make a mine but I don't know where I'm going to put the overburden or the tailings, I believe that I've [beaten] them to regulatory health and I wouldn't get the permit. Lastly, I'd like to make one last comment. They talk about moving 22 million cubic yards of material. I reckon that's about 2.2 million truckloads and I reckon that's about 12 million gallons of diesel plus the diesel to load and compact material so with 20 million gallons of diesel fuel consumed, I think we need to look at the carbon footprint of the whole operation. Thank you.

Terry Harris: I'm Terry Harris. I'm with Kootenai Environmental Alliance here based in Coeur d'Alene. Our organization has about 500 members some of whom are living up here in Shoshone County. Most of them live in the Lower Basin in Kootenai County. I've had an opportunity to review the ROD. Our view of it is it's smart but not fatally so. On procedure, just on the comment period, we support an extended comment period but not so much that it's unnecessarily delayed to the extent that people have their minds made up about this ROD. I'm not sure how much more comment period is necessary. We recommend 30 to 45 days. The fundamentals of our approach here is going to be that public health first and foremost, protect the existing [remedy] but do it according to

No comments

Magnuson, John, I884, Letter 619651-13

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When Pete Leffler came here 30 years ago, Pete and I used to go fish up here past Zook's (phonetic). It was that addition. I can't think of the name. Help me, you guys. There's a few houses up past Zook's there. We used to catch those fish and go back to Pete's and fry them up and, you know, nothing was wrong with that stuff.

I mean this valley has taken care of itself. Now people are going to say, yeah, Nonini, you were always crazy, but my point is that this valley has taken care of itself, the mining companies operate efficiently and effectively, and we need to keep this valley vibrant. The population sign says 930. It used to say 2700 people, and with the price of metals and what the mining companies want to do in this area, the EPA needs to let them move forward and be reasonable about what we're doing. Thanks. I went over a little bit.

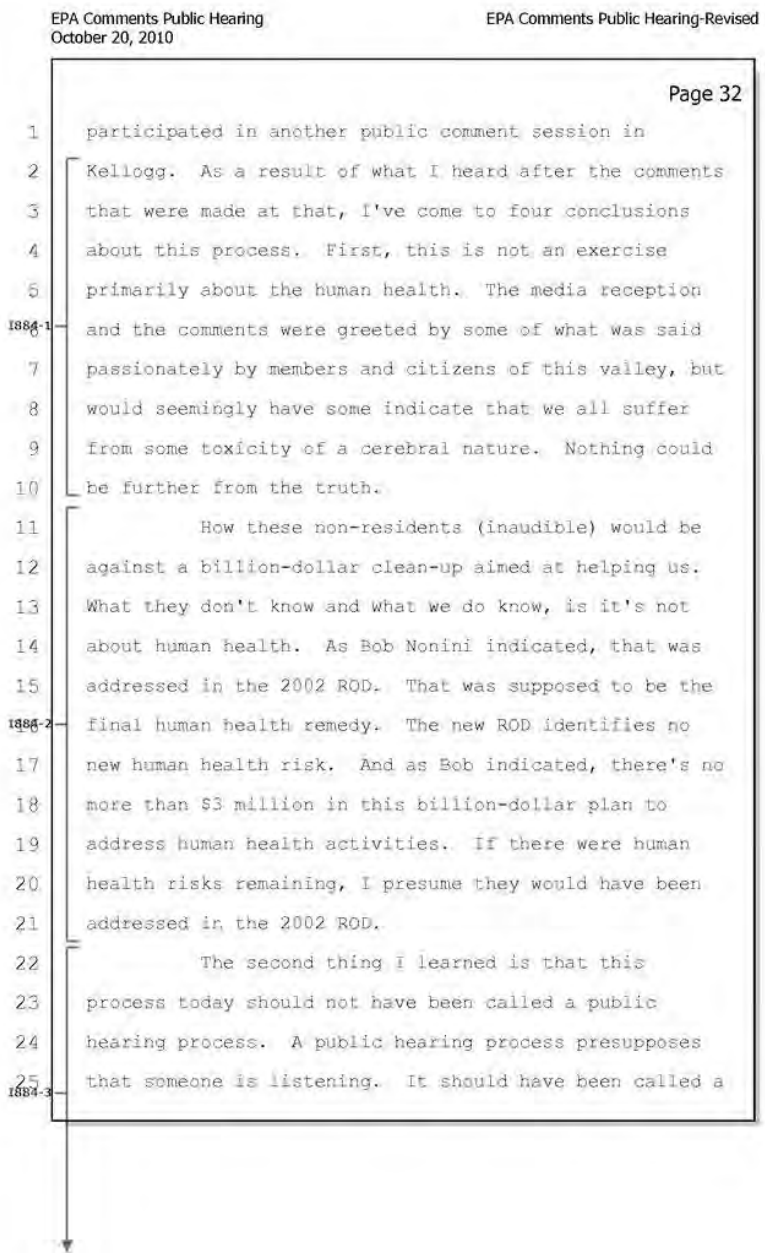
(Applause.)

MAYOR VESTER: John Magnuson followed by Jim Sabala.

JOHN MAGNUSON: Thank you, Mayor Vester and mayors. My name is John Magnuson. I live in Coeur d'Alene. My heart is with Wallace, always has and always will.

On August 9, at the request of Mayor Vester, I

No comments



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participated in another public comment session in Kellogg. As a result of what I heard after the comments that were made at that, I've come to four conclusions about this process. First, this is not an exercise primarily about the human health. The media reception and the comments were greeted by some of what was said passionately by members and citizens of this valley, but would seemingly have some indicate that we all suffer from some toxicity of a cerebral nature. Nothing could be further from the truth.

I884-1

How these non-residents (inaudible) would be against a billion-dollar clean-up aimed at helping us. What they don't know and what we do know, is it's not about human health. As Bob Nonini indicated, that was addressed in the 2002 ROD. That was supposed to be the final human health remedy. The new ROD identifies no new human health risk. And as Bob indicated, there's no more than $3 million in this billion-dollar plan to address human health activities. If there were human health risks remaining, I presume they would have been addressed in the 2002 ROD.

I884-2

The second thing I learned is that this process today should not have been called a public hearing process. A public hearing process presupposes that someone is listening. It should have been called a

I884-3

Response to comment I884-1

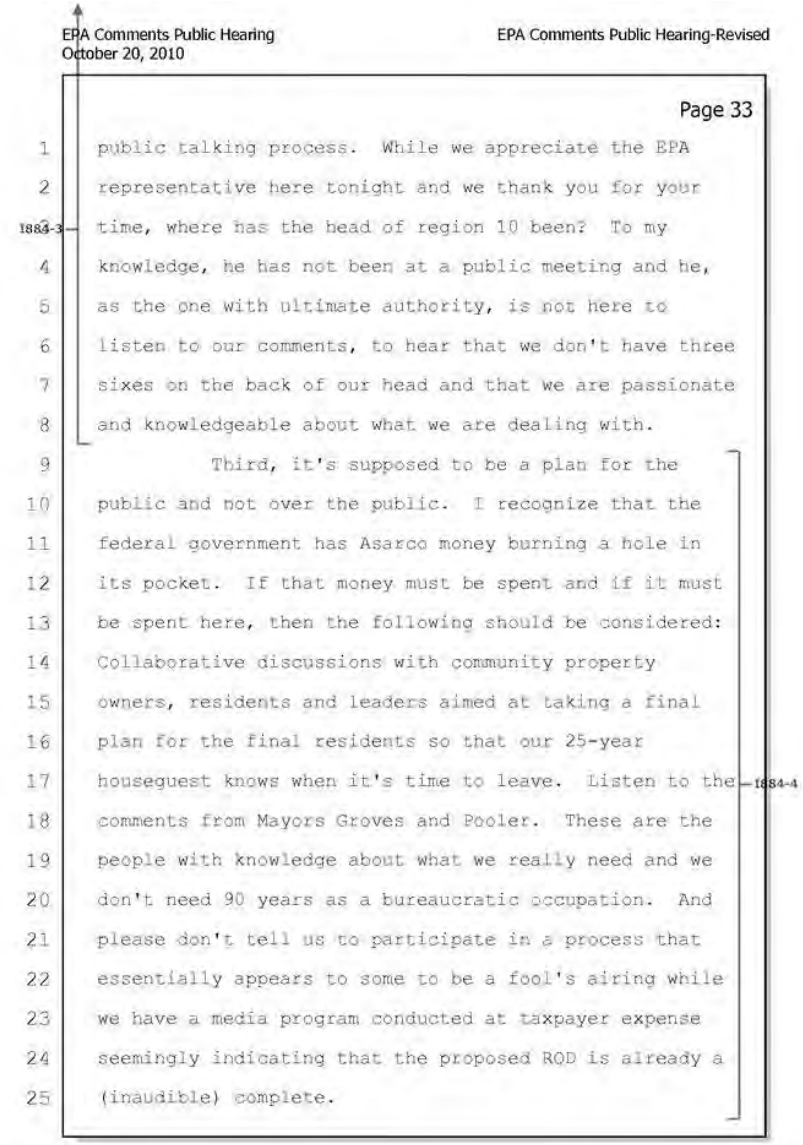
See response to Comment No. I295-1.

Response to comment I884-2

Regarding human health risks in the Basin, see response to Comment No. I295-1. The Upper Basin Selected Remedy includes an estimated $33.8 million for remedy protection work in the Upper Basin. Remedy protection is intended to protect the existing human health clean soil barriers (e.g., remediated yards and rights-of-way) within Upper Basin communities from tributary flooding and high-precipitation events. In addition to the remedy protection work, cleanup actions that address mine waste contamination within drainage areas accessible for recreational use will protect human health and improve surface water quality. Common recreational activities in the Coeur d'Alene Basin include hiking, fishing, hunting, boating, swimming, and all-terrain-vehicle riding. As noted in the ROD Amendment, Part 3, Section 3.2.4, exposure to lead contamination can cause elevated blood lead levels and resulting adverse neurological effects. EPA has also found that elevated blood lead levels can occur within relatively short exposure periods (such as through recreational exposure to contamination located along the SFCDR, on waste piles, etc.). The Selected Remedy will provide clean surface soil in contaminated areas and reduce particulate lead loading to surface water. In these ways, the Selected Remedy will further reduce the risks people may be exposed to during recreational activities.

Response to comment I884-3

See response to Comment No. I295-2.



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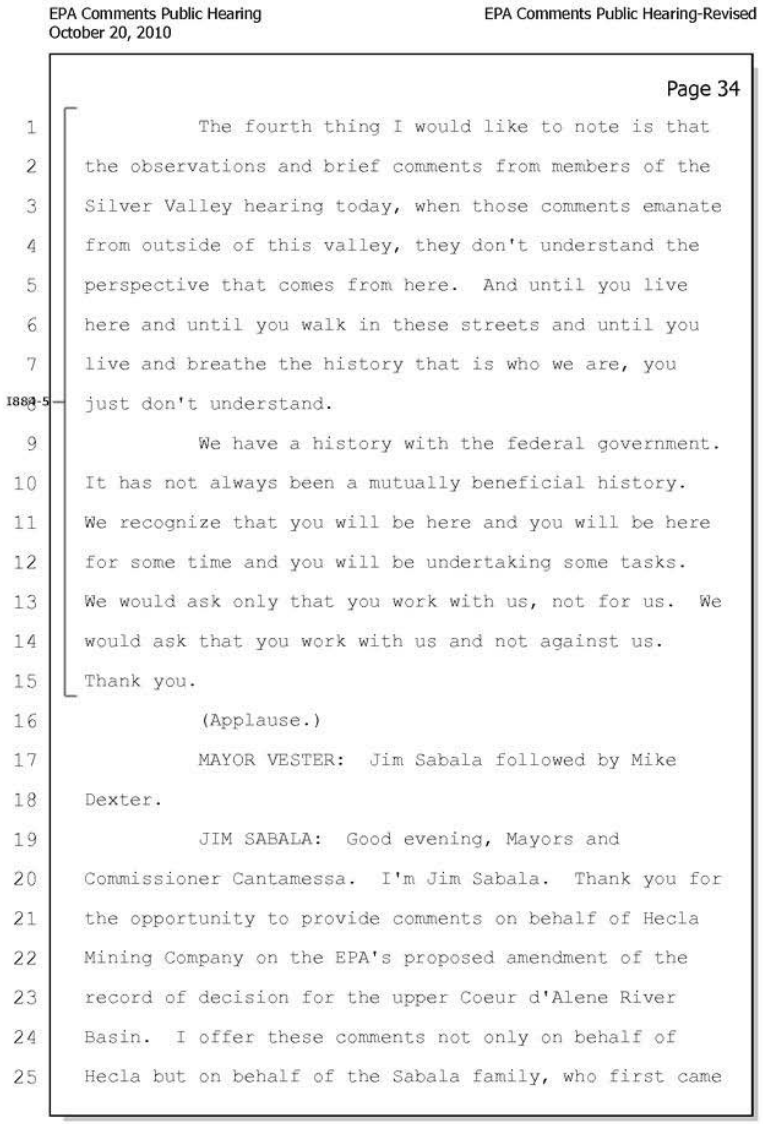
public talking process. While we appreciate the EPA representative here tonight and we thank you for your time, where has the head of region 10 been? To my knowledge, he has not been at a public meeting and he, as the one with ultimate authority, is not here to listen to our comments, to hear that we don't have three sixes on the back of our head and that we are passionate and knowledgeable about what we are dealing with. I884-3

Third, it's supposed to be a plan for the public and not over the public. I recognize that the federal government has Asarco money burning a hole in its pocket. If that money must be spent and if it must be spent here, then the following should be considered: Collaborative discussions with community property owners, residents and leaders aimed at taking a final plan for the final residents so that our 25-year houseguest knows when it's time to leave. Listen to the comments from Mayors Groves and Pooler. These are the people with knowledge about what we really need and we don't need 90 years as a bureaucratic occupation. And please don't tell us to participate in a process that essentially appears to some to be a fool's airing while we have a media program conducted at taxpayer expense seemingly indicating that the proposed ROD is already a (inaudible) complete. I884-4

Response to comment I884-4

EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of its work. The ongoing involvement of the community will be an important part of the cleanup as it moves forward. See responses to Comment Nos. I295-2 and I822-14.



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The fourth thing I would like to note is that the observations and brief comments from members of the Silver Valley hearing today, when those comments emanate from outside of this valley, they don't understand the perspective that comes from here. And until you live here and until you walk in these streets and until you live and breathe the history that is who we are, you just don't understand. I884-5

We have a history with the federal government. It has not always been a mutually beneficial history. We recognize that you will be here and you will be here for some time and you will be undertaking some tasks. We would ask only that you work with us, not for us. We would ask that you work with us and not against us. Thank you.

(Applause.)

MAYOR VESTER: Jim Sabala followed by Mike Dexter.

JIM SABALA: Good evening, Mayors and Commissioner Cantamessa. I'm Jim Sabala. Thank you for the opportunity to provide comments on behalf of Hecla Mining Company on the EPA's proposed amendment of the record of decision for the upper Coeur d'Alene River Basin. I offer these comments not only on behalf of Hecla but on behalf of the Sabala family, who first came

Response to comment I884-5

Thank you for your comment. See response to Comment I295-2.

Mahoney, Edward, I685, Letter 618295

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

mahoney.edward@gmail.com to: formsubmission 11/17/2010 11:55 AM

Sent by: Mahoney.Edward@Gmail.Com <mahoney.edward=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Edward Mahoney
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: mahoney.edward@gmail.com
Mailing Address: 11703 Briar Glen Lane|Sandy|Utah|84092|US
Phone Number:

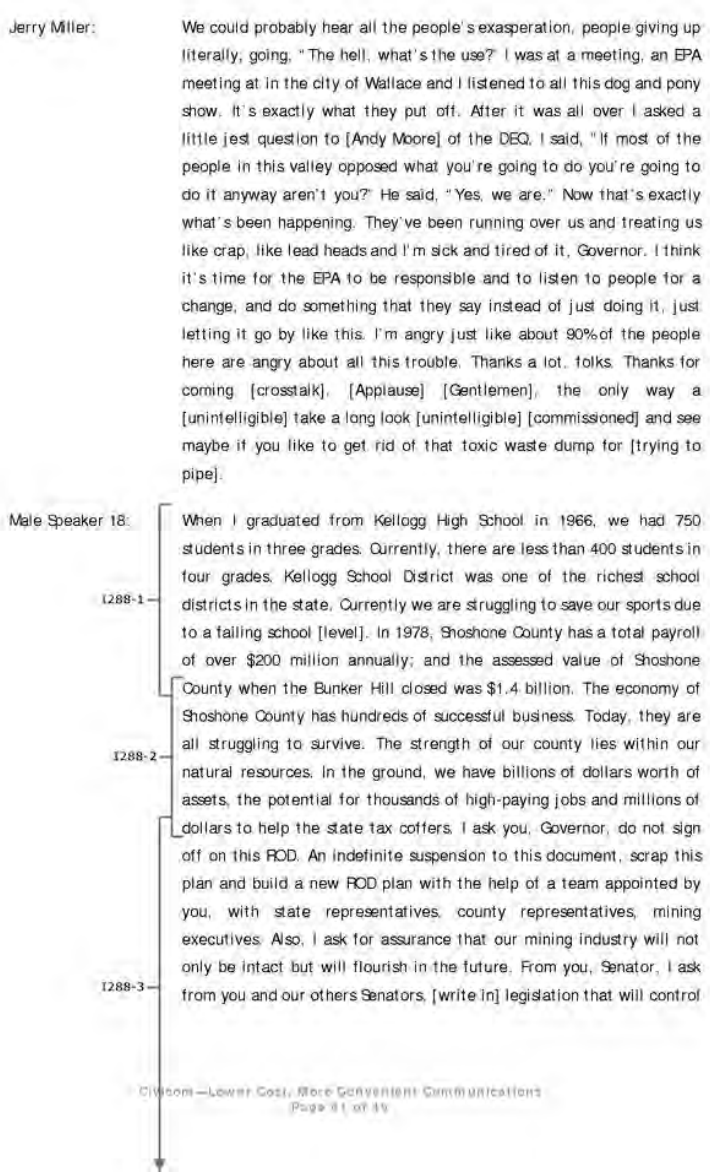
I685-1

618295

Response to comment I685-1

See response to Comment No. I351-1.

Male Speaker 18, I288, Letter 616015-53



Jerry Miller: We could probably hear all the people's exasperation, people giving up literally, going, "The hell, what's the use?" I was at a meeting, an EPA meeting at in the city of Wallace and I listened to all this dog and pony show. It's exactly what they put off. After it was all over I asked a little jest question to [Andy Moore] of the DEQ. I said, "If most of the people in this valley opposed what you're going to do you're going to do it anyway aren't you?" He said, "Yes, we are." Now that's exactly what's been happening. They've been running over us and treating us like crap, like lead heads and I'm sick and tired of it, Governor. I think it's time for the EPA to be responsible and to listen to people for a change, and do something that they say instead of just doing it, just letting it go by like this. I'm angry just like about 90% of the people here are angry about all this trouble. Thanks a lot, folks. Thanks for coming. [crosstalk]. [Applause] [Gentlemen], the only way a [unintelligible] take a long look [unintelligible] [commissioned] and see maybe if you like to get rid of that toxic waste dump for [trying to pipe].

Male Speaker 18: When I graduated from Kellogg High School in 1966, we had 750 students in three grades. Currently, there are less than 400 students in four grades. Kellogg School District was one of the richest school districts in the state. Currently we are struggling to save our sports due to a failing school [level]. In 1978, Shoshone County has a total payroll of over $200 million annually; and the assessed value of Shoshone County when the Bunker Hill closed was $1.4 billion. The economy of Shoshone County has hundreds of successful business. Today, they are all struggling to survive. The strength of our county lies within our natural resources. In the ground, we have billions of dollars worth of assets, the potential for thousands of high-paying jobs and millions of dollars to help the state tax coffers. I ask you, Governor, do not sign off on this ROD. An indefinite suspension to this document, scrap this plan and build a new ROD plan with the help of a team appointed by you, with state representatives, county representatives, mining executives. Also, I ask for assurance that our mining industry will not only be intact but will flourish in the future. From you, Senator, I ask from you and our others Senators, [write in] legislation that will control

I288-1

I288-2

I288-3

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Response to comment I288-1

Thank you for your comment.

Response to comment I288-2

See response to Comment No. I58-5.

Response to comment I288-3

Thank you for your comment. See response to Comment No. I58-5.

I288-3

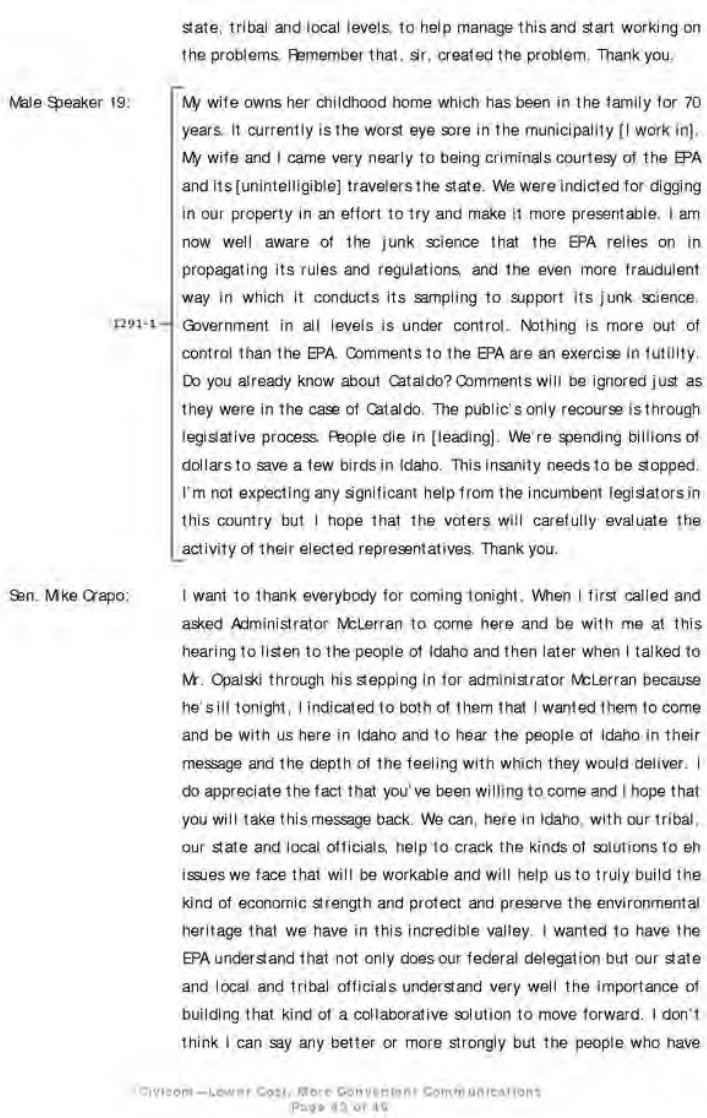
this agency along with the US Fish and Wildlife and the US [Foreign] Service. Thank you.

Female Speaker 11: There is an old adage that says, "If you drop a frog in hot water, it'll jump out. But if you put a frog in cold water and gradually warm up the water and the frog together, the water will begin to boil before the frog realizes it's being cooked and can escape." We need to be very cautious that the EPA has been boiling our water while we think we're enjoying a warm bath [laughter]. If you went to the meeting last week, the EPA gave a great presentation. They forgot one thing, to hand out the cooling [door] [laughter]. The remediation has to be created some very much needed summer appointment. Unfortunately, for most employees that is all. It's part-time summer employment with no benefits. That cannot sustain families. The mines provide real jobs year round with all the benefits. The valley cannot afford to trade real mining jobs for summer remediation jobs. It appears the EPA wants a planned advice that holds the mine's future and then both for the next 100 years by exaggerating the risks to human health, wildlife with no EPA accountability. The proposed ROD amendment is lacking with specific science and it should address funding our water rights, protect clean areas and protect current and future mining. Thank you.

Ruben Mills: I've seen [unintelligible] at work. I'm Ruben Mills, our corporate headquarters in Spokane. We employ about 185 people over at Lincoln County, Montana and pardon my [unintelligible] reference but we do not have a dog in this fight directly. But I can tell you as a mining industry executive, if this plan's allowed to expand as proposed, there's no question it's going to affect the minerals industry here in Coeur d'Alene Basin, Shoshone County specifically, but in the many, many others supporting and value-added industries up here. I work primarily with the finance side of things and I connect on what Mr. Bond was saying that very difficult to bring instrument capital into this area based on when the Superfund designation ducked in the box as well in the entire basin. Now as a constituent, I live down in the lower base of [Unintelligible]. What I see in an expansion plan like this really comes in terms of the regional government and what I would employ to you to do, Governor Otter, is stop this here, bring it back down to the

No comments

Male Speaker 19, I291, Letter 616015-56



state, tribal and local levels, to help manage this and start working on the problems. Remember that, sir, created the problem. Thank you.

Male Speaker 19: My wife owns her childhood home which has been in the family for 70 years. It currently is the worst eye sore in the municipality [I work in]. My wife and I came very nearly to being criminals courtesy of the EPA and its [unintelligible] travelers the state. We were indicted for digging in our property in an effort to try and make it more presentable. I am now well aware of the junk science that the EPA relies on in propagating its rules and regulations, and the even more fraudulent way in which it conducts its sampling to support its junk science. I291-1 Government in all levels is under control. Nothing is more out of control than the EPA. Comments to the EPA are an exercise in futility. Do you already know about Cataldo? Comments will be ignored just as they were in the case of Cataldo. The public's only recourse is through legislative process. People die in [leading]. We're spending billions of dollars to save a few birds in Idaho. This insanity needs to be stopped. I'm not expecting any significant help from the incumbent legislators in this country but I hope that the voters will carefully evaluate the activity of their elected representatives. Thank you.

Sen. Mike Crapo: I want to thank everybody for coming tonight. When I first called and asked Administrator McLerran to come here and be with me at this hearing to listen to the people of Idaho and then later when I talked to Mr. Opalski through his stepping in for administrator McLerran because he's ill tonight, I indicated to both of them that I wanted them to come and be with us here in Idaho and to hear the people of Idaho in their message and the depth of the feeling with which they would deliver. I do appreciate the fact that you've been willing to come and I hope that you will take this message back. We can, here in Idaho, with our tribal, our state and local officials, help to crack the kinds of solutions to eh issues we face that will be workable and will help us to truly build the kind of economic strength and protect and preserve the environmental heritage that we have in this incredible valley. I wanted to have the EPA understand that not only does our federal delegation but our state and local and tribal officials understand very well the importance of building that kind of a collaborative solution to move forward. I don't think I can say any better or more strongly but the people who have

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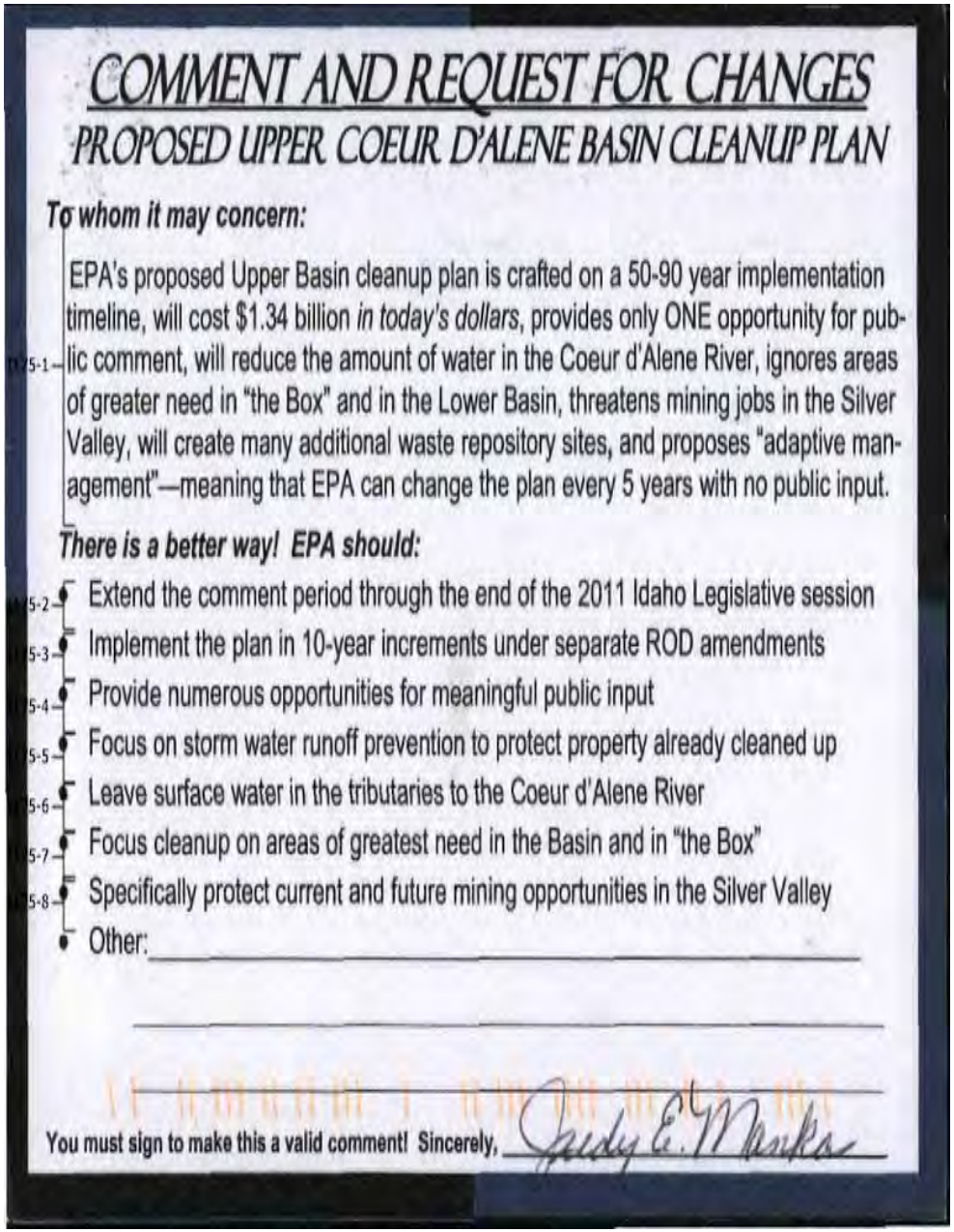
Response to comment I291-1

See response to Comment No. I295-2. EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. As documented in the FFS, Proposed Plan and ROD Amendment, EPA and other agencies have conducted many studies over the years that document these unacceptable risks posed by contamination in the Upper Basin.

Manka, Judy, I175, Letter 1357368



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I175-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I175-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I175-3 Implement the plan in 10-year increments under separate ROD amendments
- I175-4 Provide numerous opportunities for meaningful public input
- I175-5 Focus on storm water runoff prevention to protect property already cleaned up
- I175-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I175-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I175-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

_____

_____

You must sign to make this a valid comment! Sincerely, Judy E. Manka

Response to comment I175-1
See response to Comment No. I25-1.

Response to comment I175-2
See response to Comment No. I25-2.

Response to comment I175-3
See response to Comment No. I25-3.

Response to comment I175-4
See response to Comment No. I25-4.

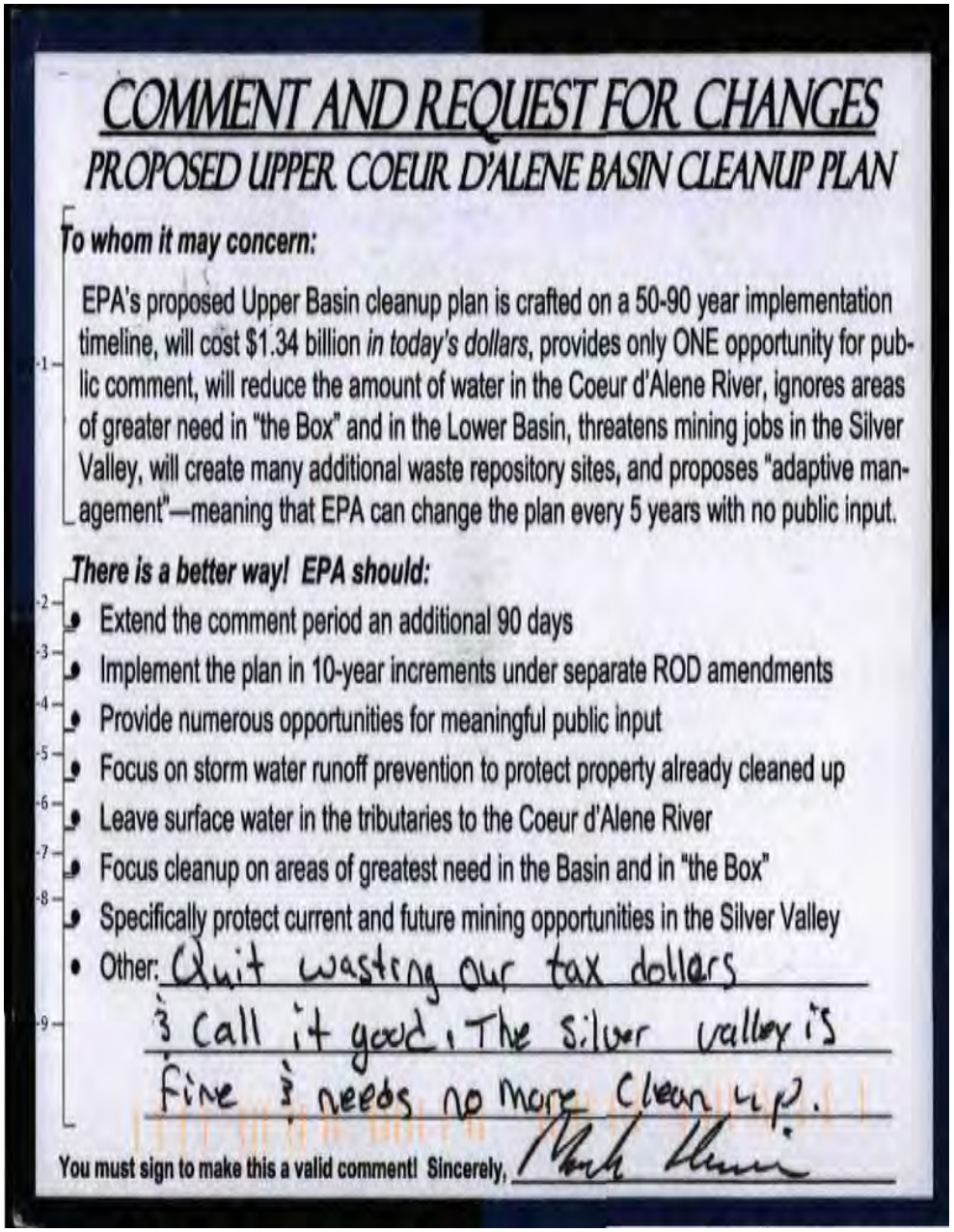
Response to comment I175-5
See response to Comment No. I25-5.

Response to comment I175-6
See response to Comment No. I25-6.

Response to comment I175-7
See response to Comment No. I25-7.

Response to comment I175-8
See response to Comment No. I25-8.

Mark, I32, Letter 1357076



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input. -1

There is a better way! EPA should:

- Extend the comment period an additional 90 days -2
- Implement the plan in 10-year increments under separate ROD amendments -3
- Provide numerous opportunities for meaningful public input -4
- Focus on storm water runoff prevention to protect property already cleaned up -5
- Leave surface water in the tributaries to the Coeur d'Alene River -6
- Focus cleanup on areas of greatest need in the Basin and in "the Box" -7
- Specifically protect current and future mining opportunities in the Silver Valley -8
- Other: Quit wasting our tax dollars & call it good. The Silver Valley is fine & needs no more clean up. -9

You must sign to make this a valid comment! Sincerely, Mark Hunn

Response to comment I32-1
See response to Comment No. I25-1.

Response to comment I32-2
See response to Comment No. I25-2.

Response to comment I32-3
See response to Comment No. I25-3.

Response to comment I32-4
See response to Comment No. I25-4.

Response to comment I32-5
See response to Comment No. I25-5.

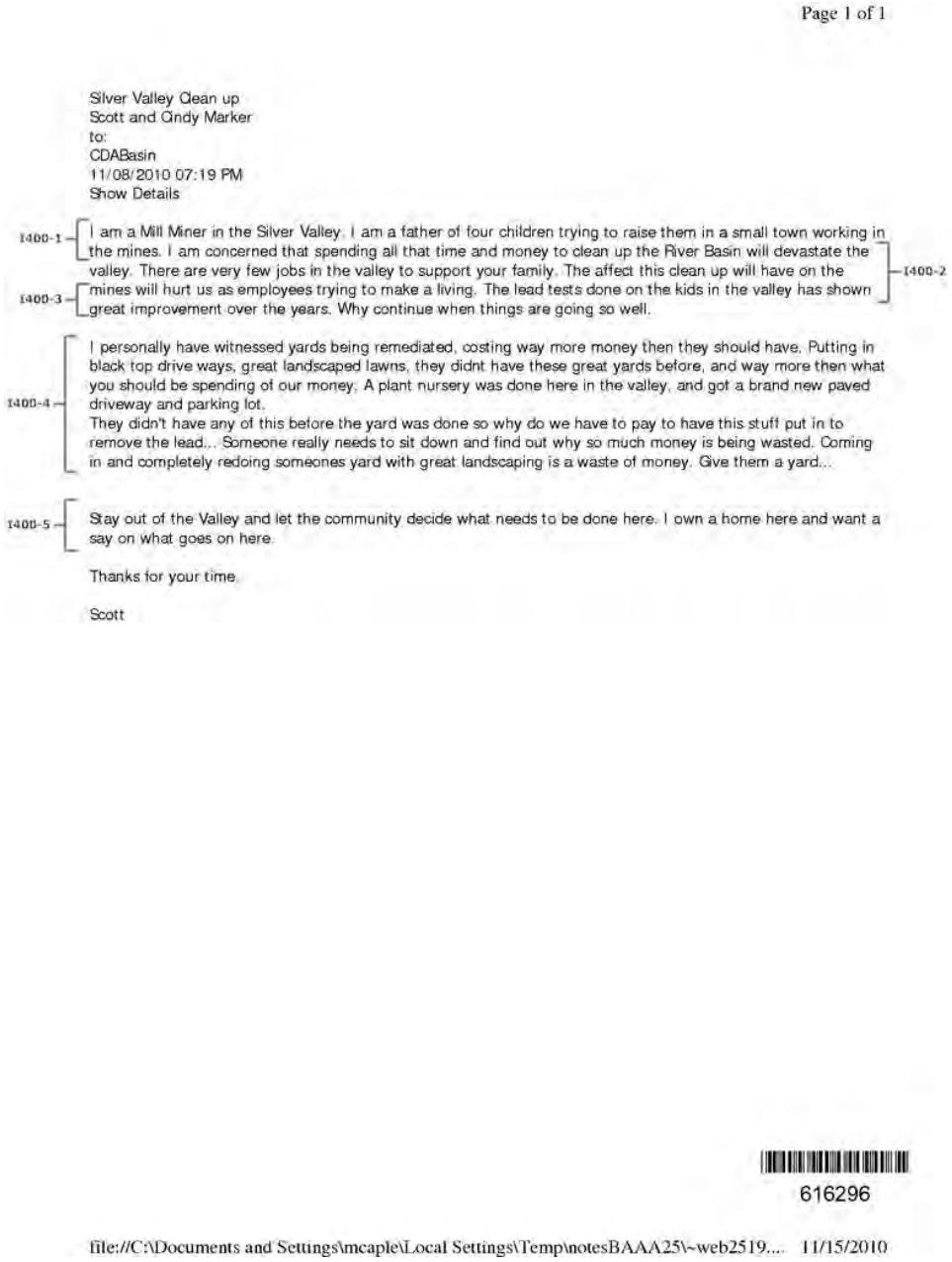
Response to comment I32-6
See response to Comment No. I25-6.

Response to comment I32-7
See response to Comment No. I25-7.

Response to comment I32-8
See response to Comment No. I25-8.

Response to comment I32-9
See responses to Comment Nos. I295-1, I58-2 and I295-3.

Marker, Scott, I400, Letter 616296



Page 1 of 1

Silver Valley Clean up
Scott and Cindy Marker
to:
CDABasin
11/08/2010 07:19 PM
Show Details

I400-1 I am a Mill Miner in the Silver Valley. I am a father of four children trying to raise them in a small town working in the mines. I am concerned that spending all that time and money to clean up the River Basin will devastate the valley. There are very few jobs in the valley to support your family. The affect this clean up will have on the I400-2
I400-3 mines will hurt us as employees trying to make a living. The lead tests done on the kids in the valley has shown great improvement over the years. Why continue when things are going so well.

I400-4 I personally have witnessed yards being remediated, costing way more money then they should have. Putting in black top drive ways, great landscaped lawns, they didnt have these great yards before, and way more then what you should be spending of our money. A plant nursery was done here in the valley, and got a brand new paved driveway and parking lot.
They didn't have any of this before the yard was done so why do we have to pay to have this stuff put in to remove the lead... Someone really needs to sit down and find out why so much money is being wasted. Coming in and completely redoing someones yard with great landscaping is a waste of money. Give them a yard...

I400-5 Stay out of the Valley and let the community decide what needs to be done here. I own a home here and want a say on what goes on here.

Thanks for your time.

Scott

616296

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web2519.... 11/15/2010

Response to comment I400-1
Thank you for your comment.

Response to comment I400-2
See response to Comment No. I58-5.

Response to comment I400-3
See response to Comment No. I295-1.

Response to comment I400-4
See responses to Comment Nos. I295-1 and I521-8.

Response to comment I400-5
EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Maronick, James, I686, Letter 618296

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jrmaronick@aol.com to: formsubmission 11/17/2010 01:15 PM
Sent by: Jrmaronick@Aol.Com <jrmaronick=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: James Maronick
Date: 11/16/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
1686-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: jrmaronick@aol.com
Mailing Address: 14479 West Center Dr|lakewood|CO|80228|US
Phone Number:

618296

Response to comment I686-1

See response to Comment No. I351-1.

Marquis, Sid, I401, Letter 616297

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
sidmarquis@wseco.com to: formsubmission 11/09/2010 07:16 AM
Sent by: Sidmarquis@Wseco.Com <sidmarquis=wseco.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

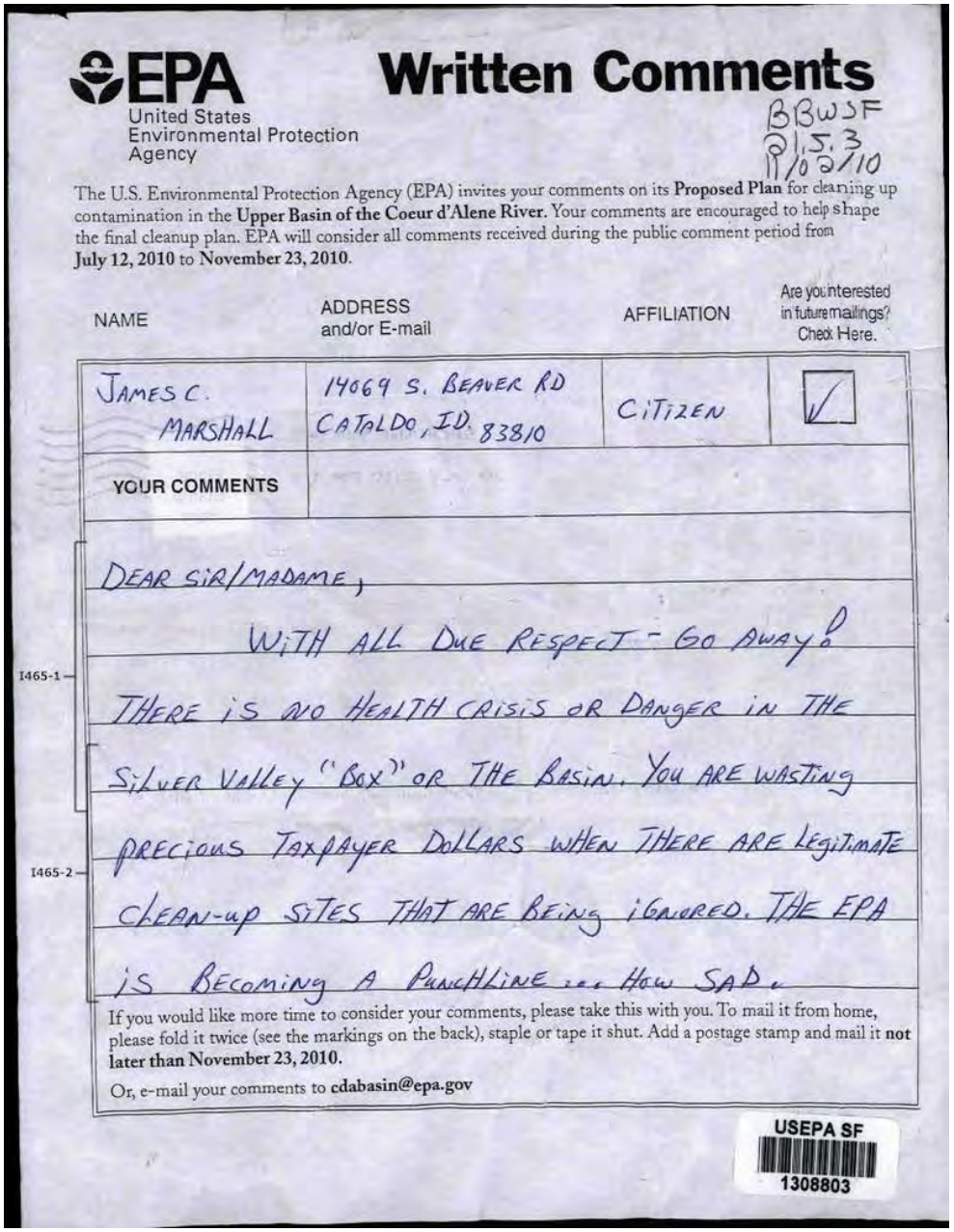
From: Sid Marquis
Date: 11/09/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I401-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: sidmarquis@wseco.com
Mailing Address: Sid Marquis, 5307 N. Argonne Lane #9|Spokane Valley|ID|99212|US
Phone Number: (509) 570-6750

616297

Response to comment I401-1

See response to Comment No. I351-1.

Marshall, James C., I465, Letter 1308803



EPA Written Comments

United States Environmental Protection Agency

BBWSF
2.1.5.3
11/02/10

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River.** Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **November 23, 2010.**

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
JAMES C. MARSHALL	14069 S. BEAVER RD CATALDO, ID. 83810	CITIZEN	☑

YOUR COMMENTS

DEAR SIR/MADAME,

WITH ALL DUE RESPECT - GO AWAY!

I465-1 THERE IS NO HEALTH CRISIS OR DANGER IN THE SILVER VALLEY ("BOX") OR THE BASIN. YOU ARE WASTING

I465-2 PRECIOUS TAXPAYER DOLLARS WHEN THERE ARE LEGITIMATE CLEAN-UP SITES THAT ARE BEING IGNORED. THE EPA IS BECOMING A PUNCHLINE ... HOW SAD.

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than November 23, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1308803

Response to comment I465-1

EPA and other agencies have done many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. Although human health risks have been greatly reduced through cleanup activities completed to date, more work is needed. EPA is committed and required by CERCLA to address the remaining unacceptable human health risks in the Upper Basin.

Response to comment I465-2

See responses to Comment Nos. I58-2, I822-14, and I295-3.

Martin, Cody, I483, Letter 1308938

BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I483-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I483-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I483-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Cody Martin Junior

USEPA SF
1308938

Response to comment I483-1
See response to Comment No. I474-1.

Response to comment I483-2
See response to Comment No. I474-2.

Response to comment I483-3
See response to Comment No. I474-3.

Marzi, Al, I402, Letter 616298

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
marzihome@verizon.net to: formsubmission 11/16/2010 04:30 AM
Sent by: Marzihome@Verizon.Net <marzihome=verizon.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

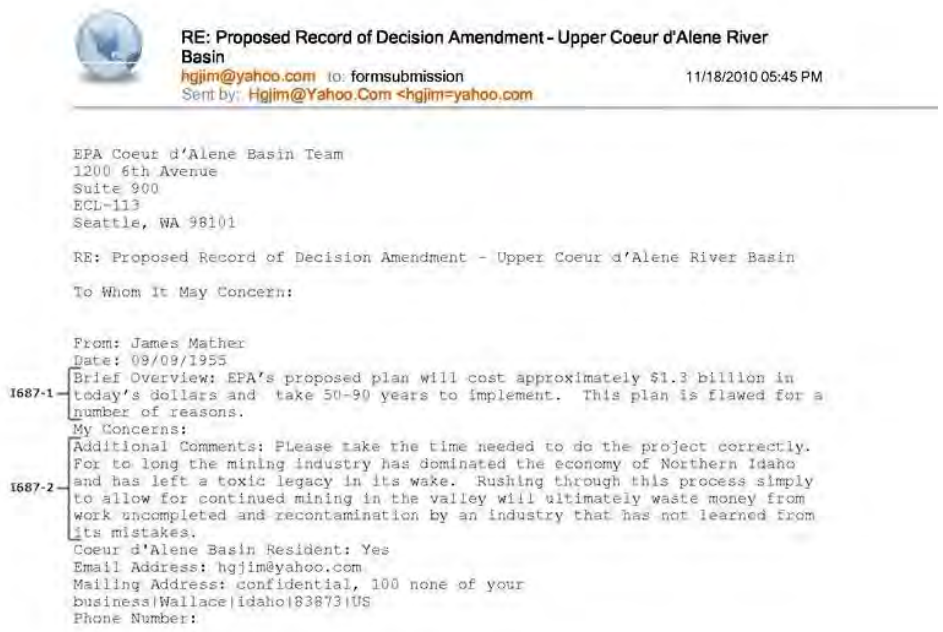
From: Al Marzi
Date: 04/20/1968
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I402-1 My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: marzihome@verizon.net
Mailing Address: 35 nassau ave|Wilmington|MA|01887|US
Phone Number:

616298

Response to comment I402-1

See response to Comment No. I351-1.

Mather, James, I687, Letter 618297



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
hgjim@yahoo.com to: formsubmission 11/18/2010 05:45 PM
Sent by: Hgjim@Yahoo.Com <hgjim=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: James Mather
Date: 09/09/1955
I687-1 Brief Overview: EPA's proposed plan will cost approximately $1.3 billlon in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns:
I687-2 Additional Comments: PLease take the time needed to do the project correctly. For to long the mining industry has dominated the economy of Northern Idaho and has left a toxic legacy in its wake. Rushing through this process simply to allow for continued mining in the valley will ultimately waste money from work uncompleted and recontamination by an industry that has not learned from its mistakes.
Coeur d'Alene Basin Resident: Yes
Email Address: hgjim@yahoo.com
Mailing Address: confidential, 100 none of your business|Wallace|Idaho|83873|US
Phone Number:

618297

Response to comment I687-1

See response to Comment No. I58-2.

Response to comment I687-2

Comment noted. See response to Comment No. I58-1.

May, Evy, I688, Letter 618298

FAILED REMEDIATION BY DEQ 59958 SILVER VALLEY RD WALLACE ID.
Evy May
to:
CDABasin
11/19/2010 04:30 PM
Show Details

I688-1

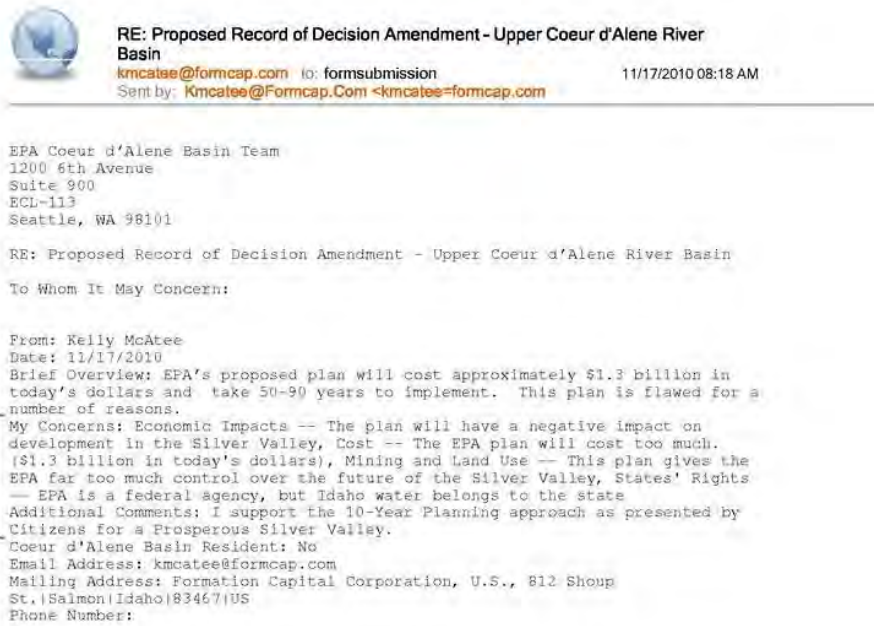
HOWDY I WAS TOLD BY DEQ THAT THE SOIL BENEATH MY GREAT MEADOWGRASS LAWN WAS CONTAMINATED. THEY DUG IT UP AND LAID SOD. SEPT OF 2005 2006 THE RYE GRASS GREW IN CLUMPS AND THE BLUE GRASS DID NOT GROW. THE GROUND WAS HARD AS CEMENT. IT WAS AERATED AND GRASS SEED PUT DOWN TWICE, NOTHING GREW. I NOW HAVE CLUMPS OF RYE GRASS AND THREE TYPES OF NOXIOUS WEEDS PLUS HUGE DANDELIONS. I HAVE A LAWN MAN (WORKS GOLF COURSE) MOW AND WEED EAT. HE ALSO PUTS WEED AND FEED ON AS DO I MYSELF. MY LAWN IS NOW TAKEN OVER BY THE WEEDS AS THE GRASS DOESN'T GROW TO CHOKE THEM OUT.
I AM A WIDOW OF 24 YEAR HECLA MINER, WHO WORKED HARD TO PAY FOR THIS PROPERTY. I KNOW HE WOULD BE HEART SICK TO SEE HIS GREAT MEADOW GRASS TURNED INTO A WEED PATCH. DEQ SAYS THERE IS NOTHING MORE THEY WILL DO FOR ME...WHAT A WASTE OF GOOD HARD WORKING MINE AND TAX PAYER MONEY. THANK YOU FOR LISTENING. I KNOW I AM NOT THE ONLY DISSATISFIED PROPERTY OWNER. PLEASE LOOK INTO THESE FAILURES.
EVELYN ROGERS-BURKETT 208 753 8171 PO BOX 1085 WALLACE ID 83873

618298

Response to comment I688-1

See response to Comment No. I521-8.

McAtee, Kelly, I689, Letter 618299



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

kmcatee@formcap.com to: formsubmission 11/17/2010 08:18 AM

Sent by: Kmcatee@Formcap.Com <kmcatee=formcap.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Kelly McAtee
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: kmcatee@formcap.com
Mailing Address: Formation Capital Corporation, U.S., 812 Shoup St.|Salmon|Idaho|83467|US
Phone Number:

I689-1

618299

Response to comment I689-1

See response to Comment No. I351-1.

McCarl, Bob, I690, Letter 618300

response to ROD Amendment, Bunker Hill site and attachment
Bob McCarl
to:
CDABasin, Bill Adams, Anne Dailey, Anne McCauley
11/22/2010 09:19 AM
Show Details

1690-1 Dear EPA Coeur d' Alene Basin Team: I apologize for the multiple postings, but I wanted to make sure that this was received. If someone could respond and let me know it is "in the hopper," I would appreciate it. I have also attached a piece I wrote about Environmental Justice and sent to Lisa Jackson. I feel strongly that this is very relevant in the Bunker Hill planning because the area has never received
1690-2 any EJ funds and I cannot think of a site more in need of that type of assistance. I appreciate the work that you have done in the valley. I hope that I have made some suggestions that might in some way assist in achieving the goal of restoring the health of communities in the Silver Valley. Thank you, Bob McCarl

618300

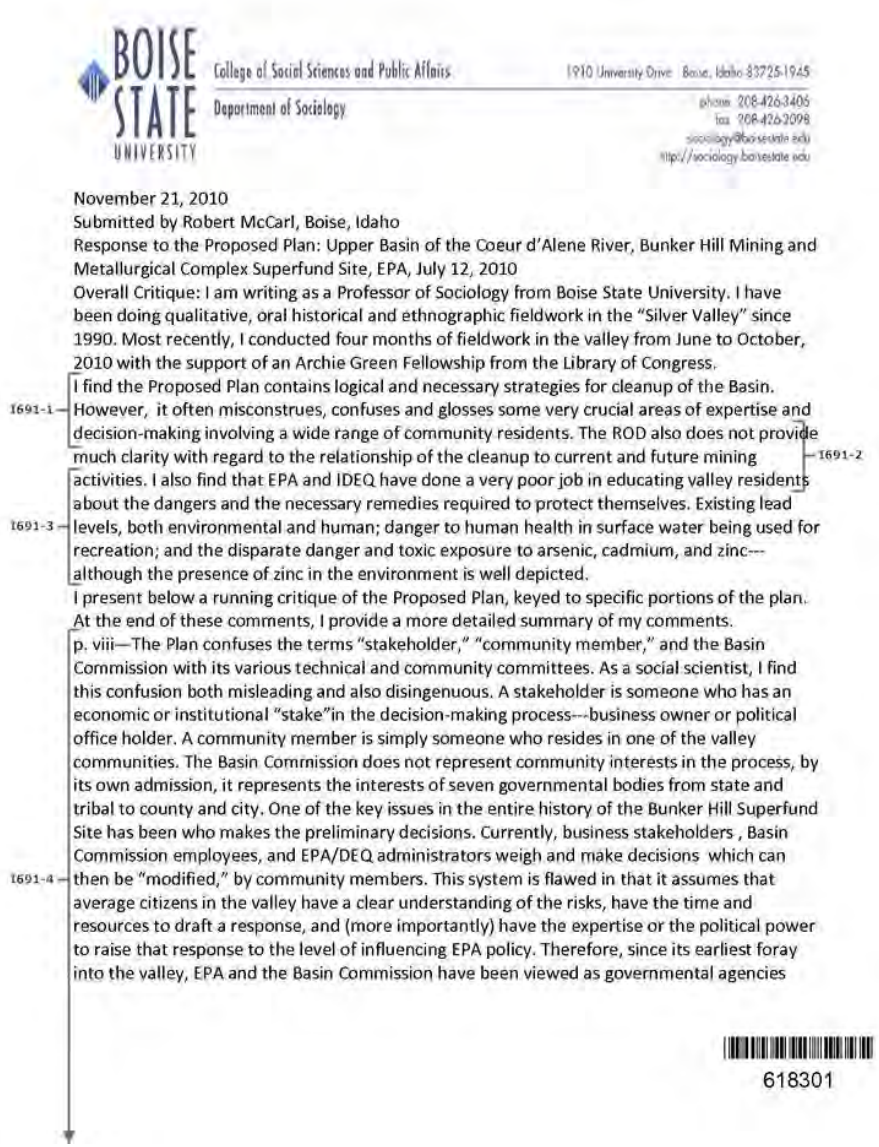
Response to comment I690-1

Thank you, your comments have been received and responses to each prepared and published along with the ROD Amendment.

Response to comment I690-2

Thank you for your comments.

McCarl, Bob, I691, Letter 618301



BOISE STATE UNIVERSITY

College of Social Sciences and Public Affairs
Department of Sociology

1910 University Drive Boise, Idaho 83725-1945
phone 208-426-3405
fax 208-426-2098
sociology@boisestate.edu
http://sociology.boisestate.edu

November 21, 2010
Submitted by Robert McCarl, Boise, Idaho
Response to the Proposed Plan: Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site, EPA, July 12, 2010
Overall Critique: I am writing as a Professor of Sociology from Boise State University. I have been doing qualitative, oral historical and ethnographic fieldwork in the "Silver Valley" since 1990. Most recently, I conducted four months of fieldwork in the valley from June to October, 2010 with the support of an Archie Green Fellowship from the Library of Congress.

I691-1 I find the Proposed Plan contains logical and necessary strategies for cleanup of the Basin. However, it often misconstrues, confuses and glosses some very crucial areas of expertise and decision-making involving a wide range of community residents. The ROD also does not provide much clarity with regard to the relationship of the cleanup to current and future mining activities. I also find that EPA and IDEQ have done a very poor job in educating valley residents about the dangers and the necessary remedies required to protect themselves. Existing lead levels, both environmental and human; danger to human health in surface water being used for recreation; and the disparate danger and toxic exposure to arsenic, cadmium, and zinc---although the presence of zinc in the environment is well depicted. I691-2 I691-3

I present below a running critique of the Proposed Plan, keyed to specific portions of the plan. At the end of these comments, I provide a more detailed summary of my comments.

p. viii—The Plan confuses the terms "stakeholder," "community member," and the Basin Commission with its various technical and community committees. As a social scientist, I find this confusion both misleading and also disingenuous. A stakeholder is someone who has an economic or institutional "stake"in the decision-making process---business owner or political office holder. A community member is simply someone who resides in one of the valley communities. The Basin Commission does not represent community interests in the process, by its own admission, it represents the interests of seven governmental bodies from state and tribal to county and city. One of the key issues in the entire history of the Bunker Hill Superfund Site has been who makes the preliminary decisions. Currently, business stakeholders , Basin Commission employees, and EPA/DEQ administrators weigh and make decisions which can I691-4 then be "modified," by community members. This system is flawed in that it assumes that average citizens in the valley have a clear understanding of the risks, have the time and resources to draft a response, and (more importantly) have the expertise or the political power to raise that response to the level of influencing EPA policy. Therefore, since its earliest foray into the valley, EPA and the Basin Commission have been viewed as governmental agencies

618301

Response to comment I691-1

Comment noted. The Proposed Plan and ROD Amendment, including the Selected Remedy, were developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. In response to comments, EPA has significantly reduced the scope of the Selected Remedy and is not including all of the remedial actions that were identified in EPA's Preferred Alternative for the Upper Basin in the Proposed Plan. Changes made to the Selected Remedy are described in detail in Part 2, Section 14.0 of this ROD Amendment.

Response to comment I691-2

See response to Comment No. I58-5.

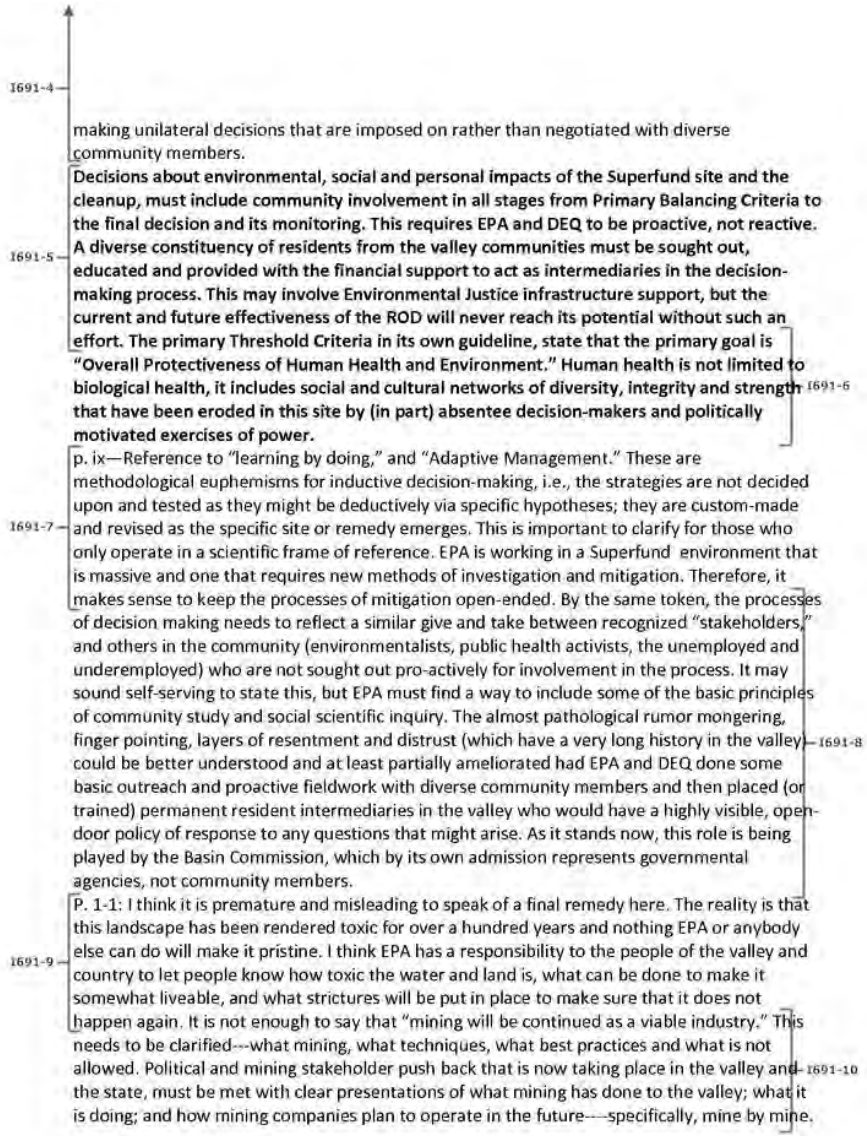
Response to comment I691-3

Protecting human health remains EPA's highest priority. There is substantial documentation of the contamination levels and risks posed (e.g. Remedial Investigation and Feasibility Study Reports for the Coeur d'Alene Basin (EPA, 2001, *Final [Revision 2] Feasibility Study Report, Coeur d'Alene Basin Remedial Investigation/Feasibility Study*; and EPA, 2001, *Final [Revision 2] Remedial Investigation Report, Coeur d'Alene Basin Remedial Investigation/Feasibility Study*), *Superfund and Mining Megasites: Lessons from the Coeur d'Alene Basin* (National Academy of Sciences, 2005, http://www.epa.gov/superfund/accomp/coeur/), the Focused Feasibility Study Report for the Upper Basin (CH2M HILL, 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*), the Basin Environmental Monitoring Program Report (EPA, 2011, *Draft BEMP/EMP Surface Water Statistical Evaluation, Bunker Hill Mining and Metallurgical Complex Superfund Site*), and the *Third Five-Year Review Report for the Bunker Hill Superfund Site* (EPA, 2010). The Panhandle Health District is the agency charged with conducting public health education activities in the area. Its Institutional Controls Program (ICP) regularly engages in educational activities related to site contamination, develops educational materials and provides voluntary health screenings. EPA has also produced and distributed educational materials, and met with

community groups on many occasions to discuss issues of concern, provide educational briefings, give site updates, and listen to and respond to their concerns.

Response to comment I691-4

Community members may and do participate in the Basin Commission's quarterly meetings; the Technical Leadership Group and its project focus teams; and the Citizens' Coordinating Council, for example. During the remedy selection process for the Upper Basin, EPA has provided an extensive and wide variety of opportunities for involvement by both community members and others who have a stake in the process and the outcome. EPA encourages citizens to participate in the agency's decision-making processes. Regardless of their varying levels of expertise, local residents have important perspectives and information to share. As they are impacted directly by the agency's decisions, the agency has a responsibility to involve local communities and to seriously consider the input of the people. In the case of this process, comments from local residents had a dramatic influence, resulting in major changes to the cleanup plan. See response to Comment No. I295-2.



I691-4

making unilateral decisions that are imposed on rather than negotiated with diverse community members.

I691-5

Decisions about environmental, social and personal impacts of the Superfund site and the cleanup, must include community involvement in all stages from Primary Balancing Criteria to the final decision and its monitoring. This requires EPA and DEQ to be proactive, not reactive. A diverse constituency of residents from the valley communities must be sought out, educated and provided with the financial support to act as intermediaries in the decision-making process. This may involve Environmental Justice infrastructure support, but the current and future effectiveness of the ROD will never reach its potential without such an effort. The primary Threshold Criteria in its own guideline, state that the primary goal is "Overall Protectiveness of Human Health and Environment." Human health is not limited to biological health, it includes social and cultural networks of diversity, integrity and strength that have been eroded in this site by (in part) absentee decision-makers and politically motivated exercises of power.

I691-6

I691-7

p. ix—Reference to "learning by doing," and "Adaptive Management." These are methodological euphemisms for inductive decision-making, i.e., the strategies are not decided upon and tested as they might be deductively via specific hypotheses; they are custom-made and revised as the specific site or remedy emerges. This is important to clarify for those who only operate in a scientific frame of reference. EPA is working in a Superfund environment that is massive and one that requires new methods of investigation and mitigation. Therefore, it makes sense to keep the processes of mitigation open-ended. By the same token, the processes of decision making needs to reflect a similar give and take between recognized "stakeholders," and others in the community (environmentalists, public health activists, the unemployed and underemployed) who are not sought out pro-actively for involvement in the process. It may sound self-serving to state this, but EPA must find a way to include some of the basic principles of community study and social scientific inquiry. The almost pathological rumor mongering, finger pointing, layers of resentment and distrust (which have a very long history in the valley) could be better understood and at least partially ameliorated had EPA and DEQ done some basic outreach and proactive fieldwork with diverse community members and then placed (or trained) permanent resident intermediaries in the valley who would have a highly visible, open-door policy of response to any questions that might arise. As it stands now, this role is being played by the Basin Commission, which by its own admission represents governmental agencies, not community members.

I691-8

I691-9

P. 1-1: I think it is premature and misleading to speak of a final remedy here. The reality is that this landscape has been rendered toxic for over a hundred years and nothing EPA or anybody else can do will make it pristine. I think EPA has a responsibility to the people of the valley and country to let people know how toxic the water and land is, what can be done to make it somewhat liveable, and what strictures will be put in place to make sure that it does not happen again. It is not enough to say that "mining will be continued as a viable industry." This needs to be clarified---what mining, what techniques, what best practices and what is not allowed. Political and mining stakeholder push back that is now taking place in the valley and the state, must be met with clear presentations of what mining has done to the valley; what it is doing; and how mining companies plan to operate in the future----specifically, mine by mine.

I691-10

Response to comment I691-5

Thank you for your comment. See response to Comment No. I295-2. EPA has heard that local residents want new ways to get information and more opportunities to be involved in decision-making. In response, EPA is offering a free resource to people throughout the basin: Technical Assistance Services for Communities, or TASC. TASC gives independent educational and technical assistance to communities, providing independent technical experts who can work for the community.

Response to comment I691-6

The Proposed Plan and ROD Amendment were conducted in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA.

Response to comment I691-7

Comment noted. Also see the response to Comment LJ11-2. Regarding the implementation of the Selected Remedy, see the ROD Amendment, Part 2, Section 12.3.

Response to comment I691-8

Comment noted. Regarding EPA's extensive community involvement process, see response to Comment No. I295-2. Additionally, EPA is bringing its "Technical Assistance Services for Communities" (TASC) program to the site. TASC provides independent experts who can give free educational and technical assistance to communities affected by hazardous waste sites. A technical assistance needs assessment is under way to learn about local assistance needs. In regards to a resident "intermediaries," EPA agrees that it is helpful to have a community liaison available in the local area. In March 2011, EPA hired (through the "SEE" program) a local resident to serve this role. That individual later accepted a different position, resigning in 2012. The agency is now looking into options for re-establishing the position. In the meantime, several local resources are available. EPA maintains a field office in Coeur d'Alene. The office of the Coeur d'Alene Trust is located in Kellogg. Also, the state Department of Environmental Quality has an office in Kellogg, staffed with several people working on the

cleanup. EPA encourages people to contact cleanup staff any time with questions or concerns.

Response to comment I691-9

See responses to Comment Nos. I58-1 and I58-5.

Response to comment I691-10

See response to Comment No. I58-5.

p. 2-1: The entire lead issue is presented in a manner that is either intentionally confusing or it is simply so complicated, it cannot be well represented in a few words. Having lived in the valley for a few months, my impression is that most people have no clue what is a healthy level of lead exposure for themselves or their children. Later in the Plan, EPA states that sampling of children has decreased in recent years and (5-2 and 3) there is some indication that lead levels have dropped. However, even this presentation is muddled---the switch from indices Ug/L to ug/dL is confusing. I do not think that Panhandle District Health has worked proactively in the community to find ways to involve community members in lead blood screening. Sue Moodie (public health researcher from Johns Hopkins) found that many families with children who have elevated lead levels do not participate in any of the Panhandle screenings or treatments due to the stigma associated with negative public perception.* This is a public health issue that requires creative and sensitive public intervention and it does exist. The much maligned Silver Valley Community Resource Center has tried for years to move this forward, but "stakeholders" in the community have blocked effective remedies. In my opinion, this issue will never go away until a clear and honest attempt is made to include affected families, measure them in private (preferably at home), publish the data clearly and go from there. Like a lot of the Superfund issues, there are millions of dollars invested in study and strategy, but the shadow of a leaded population remains.

I691-11

p. 3-3: The amount of toxicity in the surface water is astounding. Over a hundred pounds of zinc a day; extremely high levels of lead in surface water flowing through the valley. Again, I think both EPA and DEQ have to open up about these exposures. I sat through a community meeting in Kellogg where someone suggested a rafting concession on the south Fork of the Coeur d'Alene River. The Coeur d'Alene bike trail offers an interesting comparison in that the railroad right of way is heavily polluted, yet the trail itself is relatively safe. Added to this issue, is the current cut back on water quality measurement by the State of Idaho and DEQ. EPA cannot bear the responsibility of forcing the state to monitor these exposures, and one way to shame them into it is to publicize what is actually flowing down the river, creeks and drainages. I do not think that reasonable community members ever expect the valley to be totally free of toxic waste. I do think that reasonable community members expect to be told the truth about these exposures and be given the information they need to make informed individual and collective decisions about this waste.

I691-12

p. 3-4: Impound sites. The centrality of the CIA and the need for more sites, raises the question of how impoundment and riparian/drainage clean up strategies have emerged as the only viable options. The historical use of impoundment, as seen in the mining dams and dumps throughout the valley, is not really a holistic or even very safe solution. Later in the plan, an entire section is given over to a more proactive strategy with regard to flooding. Much of this area is a floodplain. So what thought has gone into more permanent forms of mitigation such as USBM research into lead removal in soils by gravity beneficiation techniques as used in military target ranges; the use of polymeric beads; treating arsenic with bacteria; metal-ion leaching, vitrification of lead; metal-ion leaching, and electrokinetic remediation. I realize these are all expensive remedies, but then they are remedies, not short-term storage responses.

I691-13

p. 3-5: Again, I do not think average readers have a sense of how these other metals, zinc, cadmium and arsenic (chemical?), affect the human body and why they are dangerous. The use of acronyms in this section, and actually throughout the Plan, becomes almost impenetrable

I691-14

Response to comment I691-11

Thank you for your comment. EPA shares your interest in expanding participation in Panhandle Health District' annual voluntary blood lead testing program. EPA, IDEQ, and Panhandle Health District continue to explore ways to encourage broader participation.

Response to comment I691-12

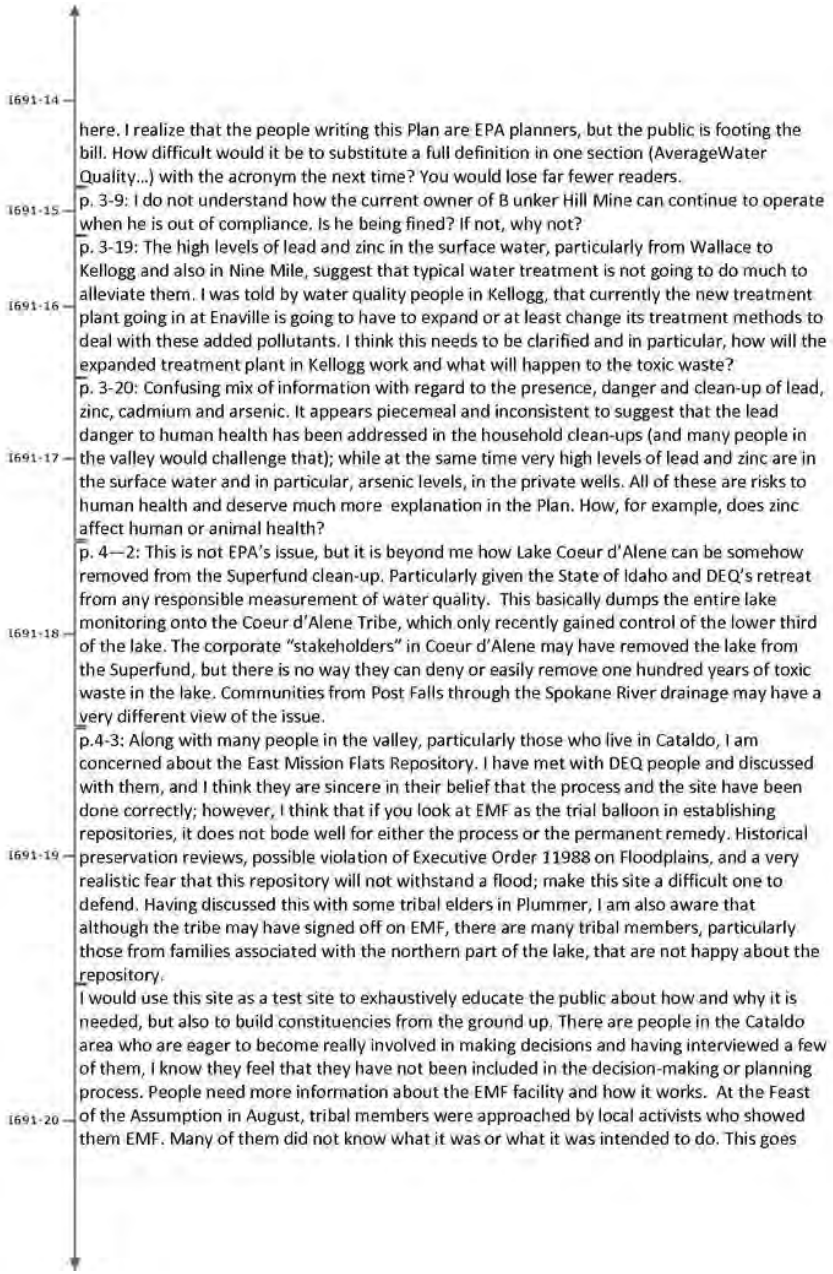
As described in the FFS and ROD Amendment, the Upper Basin has been the subject of numerous technical studies to determine the nature and extent of contamination, risk to human health and the environment and viable remedies. Considerable monitoring will continue to occur in the Upper Basin and EPA will make these results available to the public.

Response to comment I691-13

The Selected Remedy was developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. A wide variety of technologies were considered in the development of the Selected Remedy. Through ongoing adaptive management, and the CERCLA Five-Year Review process, EPA anticipates using the information gained to make adjustments to implementation plans and to evaluate and implement new technologies where appropriate.

Response to comment I691-14

As part of the report drafting process, acronyms were spelled out when first used. Considerable efforts were made to make the documents readable, while recognizing that certain topics are inherently complex. The community involvement program offered other opportunities for the public to be informed. EPA provided less technical summary information through a variety of channels. EPA will continue to strive to effectively communicate about its work, and answer questions regarding areas of confusion.



I691-14 here. I realize that the people writing this Plan are EPA planners, but the public is footing the bill. How difficult would it be to substitute a full definition in one section (AverageWater Quality…) with the acronym the next time? You would lose far fewer readers.

I691-15 p. 3-9: I do not understand how the current owner of B unker Hill Mine can continue to operate when he is out of compliance. Is he being fined? If not, why not?

I691-16 p. 3-19: The high levels of lead and zinc in the surface water, particularly from Wallace to Kellogg and also in Nine Mile, suggest that typical water treatment is not going to do much to alleviate them. I was told by water quality people in Kellogg, that currently the new treatment plant going in at Enaville is going to have to expand or at least change its treatment methods to deal with these added pollutants. I think this needs to be clarified and in particular, how will the expanded treatment plant in Kellogg work and what will happen to the toxic waste?

I691-17 p. 3-20: Confusing mix of information with regard to the presence, danger and clean-up of lead, zinc, cadmium and arsenic. It appears piecemeal and inconsistent to suggest that the lead danger to human health has been addressed in the household clean-ups (and many people in the valley would challenge that); while at the same time very high levels of lead and zinc are in the surface water and in particular, arsenic levels, in the private wells. All of these are risks to human health and deserve much more explanation in the Plan. How, for example, does zinc affect human or animal health?

I691-18 p. 4—2: This is not EPA's issue, but it is beyond me how Lake Coeur d'Alene can be somehow removed from the Superfund clean-up. Particularly given the State of Idaho and DEQ's retreat from any responsible measurement of water quality. This basically dumps the entire lake monitoring onto the Coeur d'Alene Tribe, which only recently gained control of the lower third of the lake. The corporate "stakeholders" in Coeur d'Alene may have removed the lake from the Superfund, but there is no way they can deny or easily remove one hundred years of toxic waste in the lake. Communities from Post Falls through the Spokane River drainage may have a very different view of the issue.

I691-19 p.4-3: Along with many people in the valley, particularly those who live in Cataldo, I am concerned about the East Mission Flats Repository. I have met with DEQ people and discussed with them, and I think they are sincere in their belief that the process and the site have been done correctly; however, I think that if you look at EMF as the trial balloon in establishing repositories, it does not bode well for either the process or the permanent remedy. Historical preservation reviews, possible violation of Executive Order 11988 on Floodplains, and a very realistic fear that this repository will not withstand a flood; make this site a difficult one to defend. Having discussed this with some tribal elders in Plummer, I am also aware that although the tribe may have signed off on EMF, there are many tribal members, particularly those from families associated with the northern part of the lake, that are not happy about the repository.

I691-20 I would use this site as a test site to exhaustively educate the public about how and why it is needed, but also to build constituencies from the ground up. There are people in the Cataldo area who are eager to become really involved in making decisions and having interviewed a few of them, I know they feel that they have not been included in the decision-making or planning process. People need more information about the EMF facility and how it works. At the Feast of the Assumption in August, tribal members were approached by local activists who showed them EMF. Many of them did not know what it was or what it was intended to do. This goes

Response to comment I691-15

The United States, on behalf of the EPA, has initiated a CERCLA cost recovery lawsuit against the owners of the Bunker Hill mine. The purpose of this action is to recover the monies EPA has spent treating contaminated mine water that discharges from the Bunker Hill mine as well as requiring the mine owner to come into compliance with relevant laws.

Response to comment I691-16

Water treatment for the Upper Basin Selected Remedy will not be conducted at local municipal water treatment plants, but rather at the Central Treatment Plant (CTP), an active water treatment plant in Kellogg, Idaho that treats acid mine drainage (AMD) and metals-contaminated water. The CTP is currently operated in low density sludge mode and contains excess (unused) treatment capacity during much of the year. The 2001 ROD Amendment for OU 2 identified the need for the CTP to be upgraded to improve efficiency and increase reliability, and to achieve lower concentrations of metals in the plant's discharge to better meet water quality standards. The Upper Basin Selected Remedy includes expanding the CTP to accommodate additional flows as well as the upgrades identified in the 2001 ROD Amendment that have not yet been implemented. Implementation of these upgrades will allow for operation in high density sludge mode, reduced waste sludge volumes, and consistent compliance with discharge standards. Waste sludge will be disposed of in sludge disposal cells near the CTP as is the current practice. When the existing waste sludge cell reaches capacity, a new sludge disposal cell will be constructed.

Response to comment I691-17

See response to Comment No. I295-1. Also, in regard to site risk, see ROD Amendment, Part 2, Section 7.

Response to comment I691-18

Because hazardous substances released upstream have flowed downstream and come to be located in Coeur d'Alene Lake, the Lake is part of the Site. However, a remedy for lake bed contamination has been deferred contingent on successful contaminant management through the Tribal/State Lake Management Plan (LMP). The LMP's goal is to manage metals in contaminated lake bed sediments

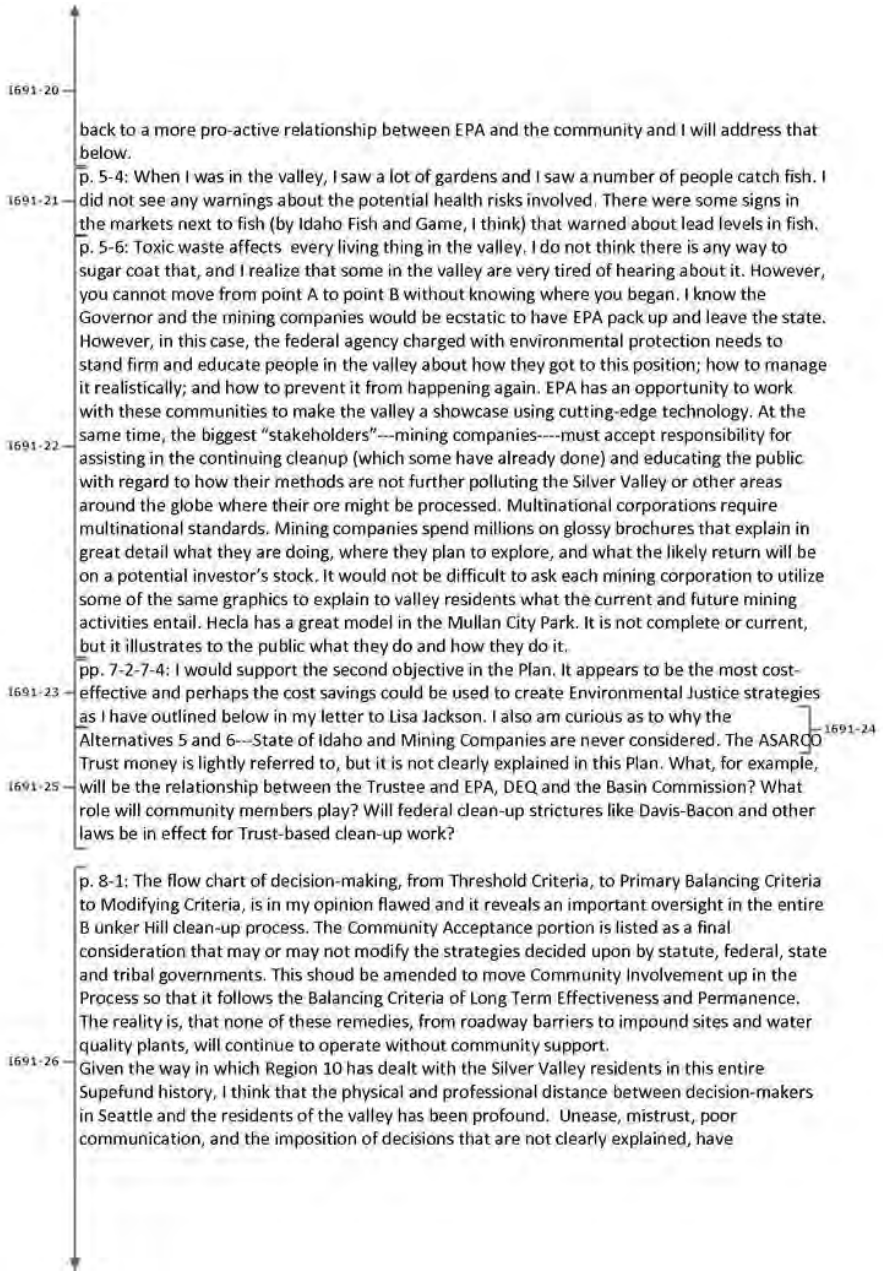
through a nutrient management plan as well as outreach and education with property owners related to their potential impacts on lake water quality. The LMP has been written and adopted by the State of Idaho and the Coeur d'Alene Tribe but its implementation is in its initial phase. The State and Tribe have been monitoring water quality in the Lake since 2007 and continue to do so. Continued water quality monitoring information, especially with implementation of remedial actions in this Upper Basin ROD Amendment, will provide the EPA, Tribe and State with data to demonstrate the effectiveness of the LMP. EPA may re-evaluate its deferral of a remedy selection for the Lake considering these data and other relevant Site information. Although the Lake is outside the scope of this Upper Basin ROD Amendment, EPA continues to recognize the importance of protecting Coeur d'Alene Lake and as such is committed to working with interested parties to clarify metrics for determining the effectiveness and sufficiency of the LMP.

Response to comment I691-19

See responses to Comment Nos. LC21-9, I54-3 and I822-11.

Response to comment I691-20

EPA uses many avenues to ensure that people have access to information as well as opportunities to participate in decision-making. These include mailings, press releases, newspaper ads, publication of the Basin Bulletin, Open Houses, public meetings, tours, fact sheets, the site's website, and so on. In the case of the EMF repository, EPA maintains a webpage with detailed information including quarterly EMF monitoring results (http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/east_mission_flats_repository). EPA regularly participates in community meetings, as well, both those sponsored by other agencies and organizations, and those sponsored by grassroots groups, in order to provide information, seek input, and engage in constructive dialogue about issues. We encourage the public to contact us any time with questions or concerns. Additionally, in response to requests for technical assistance, EPA is bringing its "Technical Assistance Services for Communities" (TASC) program to the site. TASC provides independent experts who can give free educational and technical assistance to communities affected by hazardous waste sites. A technical assistance needs assessment is under way to learn about local assistance needs.



1691-20

back to a more pro-active relationship between EPA and the community and I will address that below.

1691-21 p. 5-4: When I was in the valley, I saw a lot of gardens and I saw a number of people catch fish. I did not see any warnings about the potential health risks involved. There were some signs in the markets next to fish (by Idaho Fish and Game, I think) that warned about lead levels in fish.

p. 5-6: Toxic waste affects every living thing in the valley. I do not think there is any way to sugar coat that, and I realize that some in the valley are very tired of hearing about it. However, you cannot move from point A to point B without knowing where you began. I know the Governor and the mining companies would be ecstatic to have EPA pack up and leave the state. However, in this case, the federal agency charged with environmental protection needs to stand firm and educate people in the valley about how they got to this position; how to manage it realistically; and how to prevent it from happening again. EPA has an opportunity to work with these communities to make the valley a showcase using cutting-edge technology. At the same time, the biggest "stakeholders"---mining companies----must accept responsibility for

1691-22 assisting in the continuing cleanup (which some have already done) and educating the public with regard to how their methods are not further polluting the Silver Valley or other areas around the globe where their ore might be processed. Multinational corporations require multinational standards. Mining companies spend millions on glossy brochures that explain in great detail what they are doing, where they plan to explore, and what the likely return will be on a potential investor's stock. It would not be difficult to ask each mining corporation to utilize some of the same graphics to explain to valley residents what the current and future mining activities entail. Hecla has a great model in the Mullan City Park. It is not complete or current, but it illustrates to the public what they do and how they do it.

1691-23 pp. 7-2-7-4: I would support the second objective in the Plan. It appears to be the most cost-effective and perhaps the cost savings could be used to create Environmental Justice strategies as I have outlined below in my letter to Lisa Jackson. I also am curious as to why the Alternatives 5 and 6---State of Idaho and Mining Companies are never considered. The ASARCO Trust money is lightly referred to, but it is not clearly explained in this Plan. What, for example,

1691-24

1691-25 will be the relationship between the Trustee and EPA, DEQ and the Basin Commission? What role will community members play? Will federal clean-up strictures like Davis-Bacon and other laws be in effect for Trust-based clean-up work?

p. 8-1: The flow chart of decision-making, from Threshold Criteria, to Primary Balancing Criteria to Modifying Criteria, is in my opinion flawed and it reveals an important oversight in the entire B unker Hill clean-up process. The Community Acceptance portion is listed as a final consideration that may or may not modify the strategies decided upon by statute, federal, state and tribal governments. This shoud be amended to move Community Involvement up in the Process so that it follows the Balancing Criteria of Long Term Effectiveness and Permanence. The reality is, that none of these remedies, from roadway barriers to impound sites and water quality plants, will continue to operate without community support.

1691-26 Given the way in which Region 10 has dealt with the Silver Valley residents in this entire Supefund history, I think that the physical and professional distance between decision-makers in Seattle and the residents of the valley has been profound. Unease, mistrust, poor communication, and the imposition of decisions that are not clearly explained, have

Response to comment I691-21

Panhandle Health District provides a range of educational programs and materials through its ongoing Lead Health Intervention Program. The Intervention Program includes annual educational outreach at all Silver Valley elementary schools, warning/educational signs at specific recreational areas, distribution of health information and fish advisories, and a range of educational brochures among other activities.

Response to comment I691-22

EPA is committed to working with the mining industry and Silver Valley businesses and landowners to conduct the cleanup in ways that are consistent with the current and future land uses desired by the community, while recognizing EPA's statutory obligations regarding protection of human health and the environment. EPA, along with other agencies and organizations, continues its efforts to inform people about the contamination and the cleanup.

Response to comment I691-23

Comment noted.

Response to comment I691-24

In the 2001 FS Report, six ecological alternatives were developed and evaluated. The six alternatives are listed below and provided a range of remedial alternatives from no action to maximum removal: • Alternative 1 – No Action • Alternative 2 – Contain and Stabilize With Limited Removal, Disposal, and Treatment • Alternative 3 – More Extensive Removal, Disposal, and Treatment • Alternative 4 – Maximum Removal, Disposal, and Treatment • Alternative 5 - State of Idaho Cleanup Plan • Alternative 6 – Mining Companies Cleanup Plan Of these alternatives, only Ecological Alternatives 3 and 4 were determined by EPA to be in compliance with the National Oil and Hazardous Substances Pollution Contingency Plan (EPA, 2001, *Final (Revision 2) Feasibility Study Report, Coeur d'Alene Basin Remedial Investigation/Feasibility Study*). Therefore, during the planning of the FFS for the Upper Basin, EPA carried forward the Upper Basin components of Ecological Alternatives 3 and 4 (Referred to as Ecological Alternative 3+ and 4+ respectively) into the FFS. Furthermore, as described in the

ROD Amendment, EPA's Selected Remedy is an interim action, which includes prioritized actions from Alternative 3+.

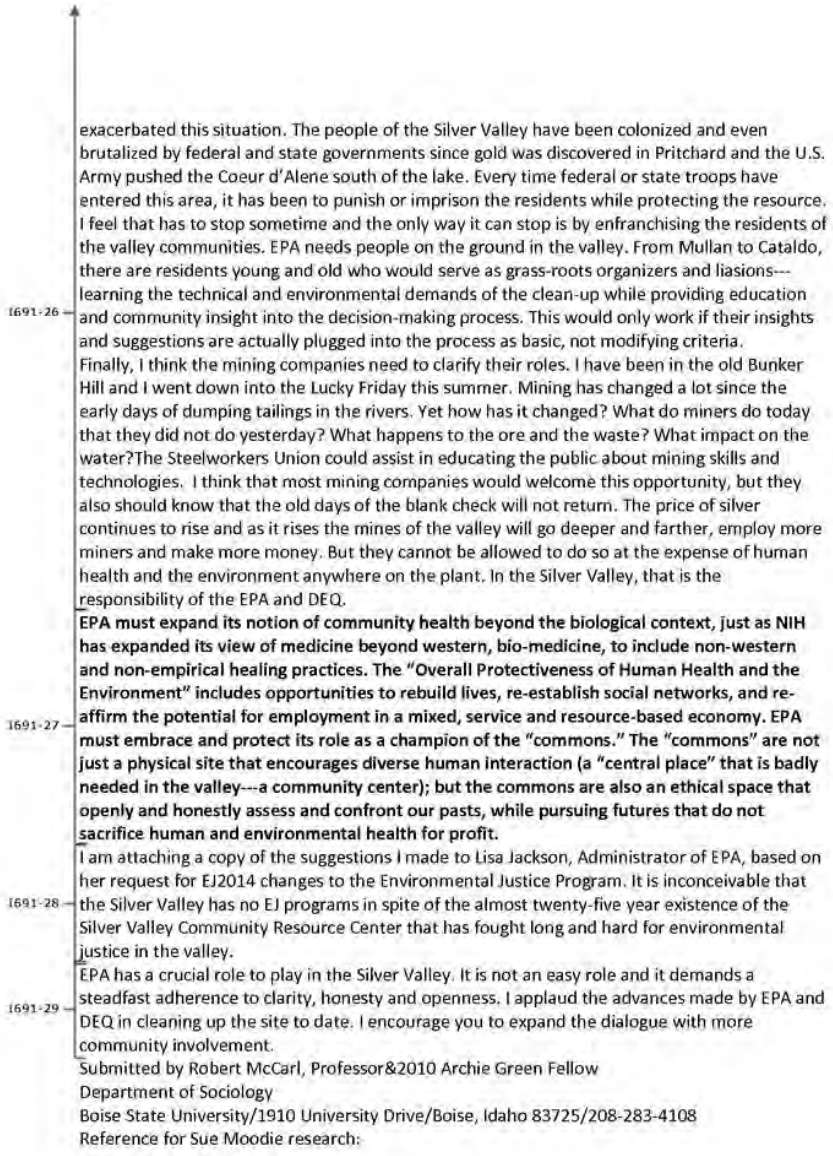
Response to comment I691-25

Consistent with and pursuant to the Successor Coeur d'Alene Custodial and Work Trust Agreement, and the bankruptcy order approving the Trust, the Trustee manages the funds held by the Trust. In general, the Trust will perform work as a limited purpose successor to ASARCO, which means that the Trust is stepping into the shoes of ASARCO when performing response actions in the Coeur d'Alene Basin. The Trustee will manage the Trust to maximize value and carry out cleanup actions selected and approved by EPA. EPA will oversee the Trust, although as the beneficiary, it cannot direct the Trust's work. EPA's decision documents (e.g., RODs and ROD Amendments) will define the work that the Trust performs, which will be further clarified in annual work plans that are approved by EPA. EPA will continue to coordinate with the communities and local, state, tribal, and federal partners in the development, selection, and prioritization of Superfund response actions.

As previously noted, the Trust will perform work pursuant to EPA decision documents. EPA will continue to involve the Basin Commission, the public, and other stakeholders in the development, selection, and prioritization of response actions. However, decisions about which projects the Trust (rather than EPA or other agencies appointed by EPA) would perform in a given year will be proposed by the Trustee and approved by EPA.

Response to comment I691-26

EPA recognizes and values community involvement in the remedy selection process. The nine criteria EPA uses to evaluate remedial alternatives, and their application in the remedy selection decision-making process are set by CERCLA and its implementing regulations, the National Oil and Hazardous Substances Pollution Contingency Plan. Also see response to Comment No. I295-2.



exacerbated this situation. The people of the Silver Valley have been colonized and even brutalized by federal and state governments since gold was discovered in Pritchard and the U.S. Army pushed the Coeur d'Alene south of the lake. Every time federal or state troops have entered this area, it has been to punish or imprison the residents while protecting the resource. I feel that has to stop sometime and the only way it can stop is by enfranchising the residents of the valley communities. EPA needs people on the ground in the valley. From Mullan to Cataldo, there are residents young and old who would serve as grass-roots organizers and liasions---learning the technical and environmental demands of the clean-up while providing education and community insight into the decision-making process. This would only work if their insights and suggestions are actually plugged into the process as basic, not modifying criteria.

I691-26

Finally, I think the mining companies need to clarify their roles. I have been in the old Bunker Hill and I went down into the Lucky Friday this summer. Mining has changed a lot since the early days of dumping tailings in the rivers. Yet how has it changed? What do miners do today that they did not do yesterday? What happens to the ore and the waste? What impact on the water?The Steelworkers Union could assist in educating the public about mining skills and technologies. I think that most mining companies would welcome this opportunity, but they also should know that the old days of the blank check will not return. The price of silver continues to rise and as it rises the mines of the valley will go deeper and farther, employ more miners and make more money. But they cannot be allowed to do so at the expense of human health and the environment anywhere on the plant. In the Silver Valley, that is the responsibility of the EPA and DEQ.

EPA must expand its notion of community health beyond the biological context, just as NIH has expanded its view of medicine beyond western, bio-medicine, to include non-western and non-empirical healing practices. The "Overall Protectiveness of Human Health and the Environment" includes opportunities to rebuild lives, re-establish social networks, and re-affirm the potential for employment in a mixed, service and resource-based economy. EPA must embrace and protect its role as a champion of the "commons." The "commons" are not just a physical site that encourages diverse human interaction (a "central place" that is badly needed in the valley---a community center); but the commons are also an ethical space that openly and honestly assess and confront our pasts, while pursuing futures that do not sacrifice human and environmental health for profit.

I691-27

I am attaching a copy of the suggestions I made to Lisa Jackson, Administrator of EPA, based on her request for EJ2014 changes to the Environmental Justice Program. It is inconceivable that the Silver Valley has no EJ programs in spite of the almost twenty-five year existence of the Silver Valley Community Resource Center that has fought long and hard for environmental justice in the valley.

I691-28

EPA has a crucial role to play in the Silver Valley. It is not an easy role and it demands a steadfast adherence to clarity, honesty and openness. I applaud the advances made by EPA and DEQ in cleaning up the site to date. I encourage you to expand the dialogue with more community involvement.

I691-29

Submitted by Robert McCarl, Professor&2010 Archie Green Fellow
Department of Sociology
Boise State University/1910 University Drive/Boise, Idaho 83725/208-283-4108
Reference for Sue Moodie research:

Response to comment I691-27
Comment noted.

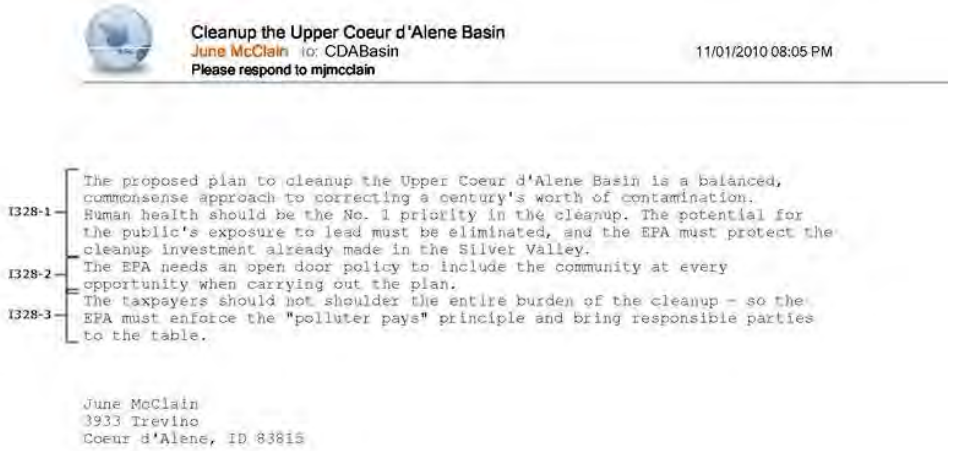
Response to comment I691-28
Comment noted.

Response to comment I691-29
Comment noted.

*S.M Moodie, E.K. Tsui and E.K. Silbergeld, "Community-and family-level factors influence care-giver choice to screen blood lead levels of children in mining community," Environmental Research, Vol.110, Issue 5, July 2010, pages 484-496.

No comments

McClain, June, I328, Letter 614458



Cleanup the Upper Coeur d'Alene Basin
June McClain to: CDABasin 11/01/2010 08:05 PM
Please respond to mjmcclain

I328-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I328-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I328-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

June McClain
3933 Trevino
Coeur d'Alene, ID 83815

614458

Response to comment I328-1

See response to Comment No. I295-1.

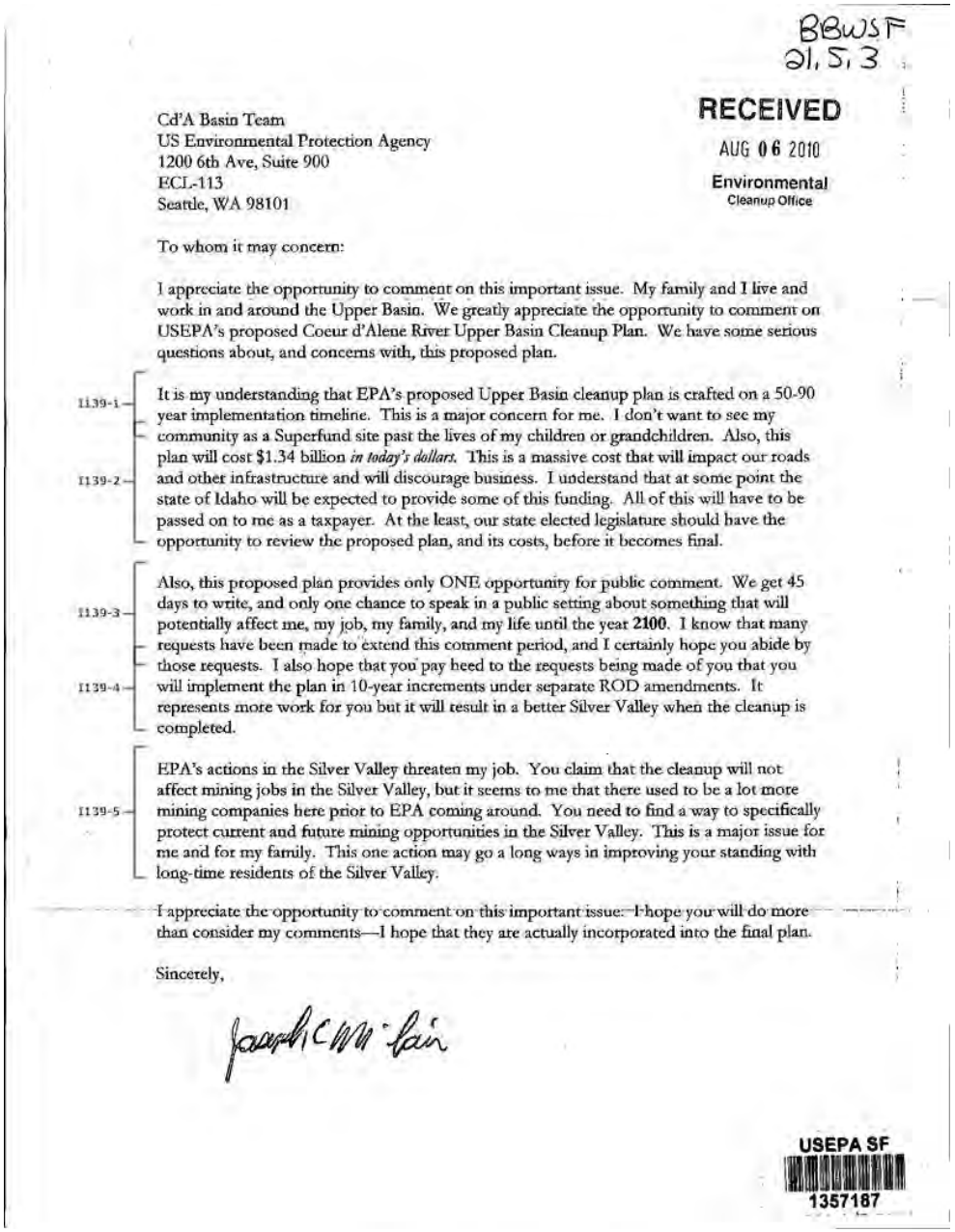
Response to comment I328-2

See response to Comment No. I295-2.

Response to comment I328-3

See response to Comment No. I295-3.

McClair, Joseph, I139, Letter 1357187



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RECEIVED
AUG 06 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I139-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I139-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I139-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I139-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I139-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Joseph C McClair

USEPA SF
1357187

Response to comment I139-1
See response to Comment No. I58-1.

Response to comment I139-2
See response to Comment No. I58-2.

Response to comment I139-3
See response to Comment No. I58-3.

Response to comment I139-4
See response to Comment No. I58-4.

Response to comment I139-5
See response to Comment No. I58-5.

McFarland, Annette, I399, Letter 616295

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
amcfarland@formcap.com to: formsubmission 11/11/2010 12:58 PM
Sent by: Amcfarland@Formcap.Com <amcfarland=formcap.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Annette McFarland
Date: 11/11/2010
Brief Overview: I appeal to those in the EPA that still have some common sense. A plan that can accomplish the right actions in less time for less money should be preferable to everyone. The EPA should look at this project the same as any business that has to make a profit. How can they do this right for the least amount of money and time, and time is money.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: The list of concerns noted are all very important, but they in many ways all boil down to the impact on the environment and by extension humans. The 10 year plan has some very valid points and recommendations to remedy the issues. Please consider the recommendations by NAS that is based on real data and serious study of the situation.
Coeur d'Alene Basin Resident: No
Email Address: amcfarland@formcap.com
Mailing Address: P.O. Box 716|Salmon|Idaho|83467|US
Phone Number: (208) 709-3191

I399-1
I399-2
I399-3

616295

Response to comment I399-1

See response to Comment No. I351-1.

Response to comment I399-2

See response to Comment No. I474-2.

Response to comment I399-3

See response to Comment No. I399-1 above.

McGarry, Kent, I404, Letter 616300

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

kmcgarry@cateeequipment.com to: formsubmission 11/10/2010 08:06 AM

Sent by: Kmcgarry@Cateeequipment.Com <kmcgarry=cateeequipment.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Kent McGarry
Date: 11/10/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. As with most government proposals, it becomes a bureaucratic nightmare and amounts to a takeover of the area by the federal govenment. An appropriate cleanup can be done over a shorter period of time and for a lot less money.

I404-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts — The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could elimiate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. The federal govenment needes to listen to the people of the state of Idaho. — I404-2
Coeur d'Alene Basin Resident: No
Email Address: kmcgarry@cateeequipment.com
Mailing Address: 2747 Garrett Way, PO Box 4988|Pocatello|Idhao|83205|US
Phone Number:

616300

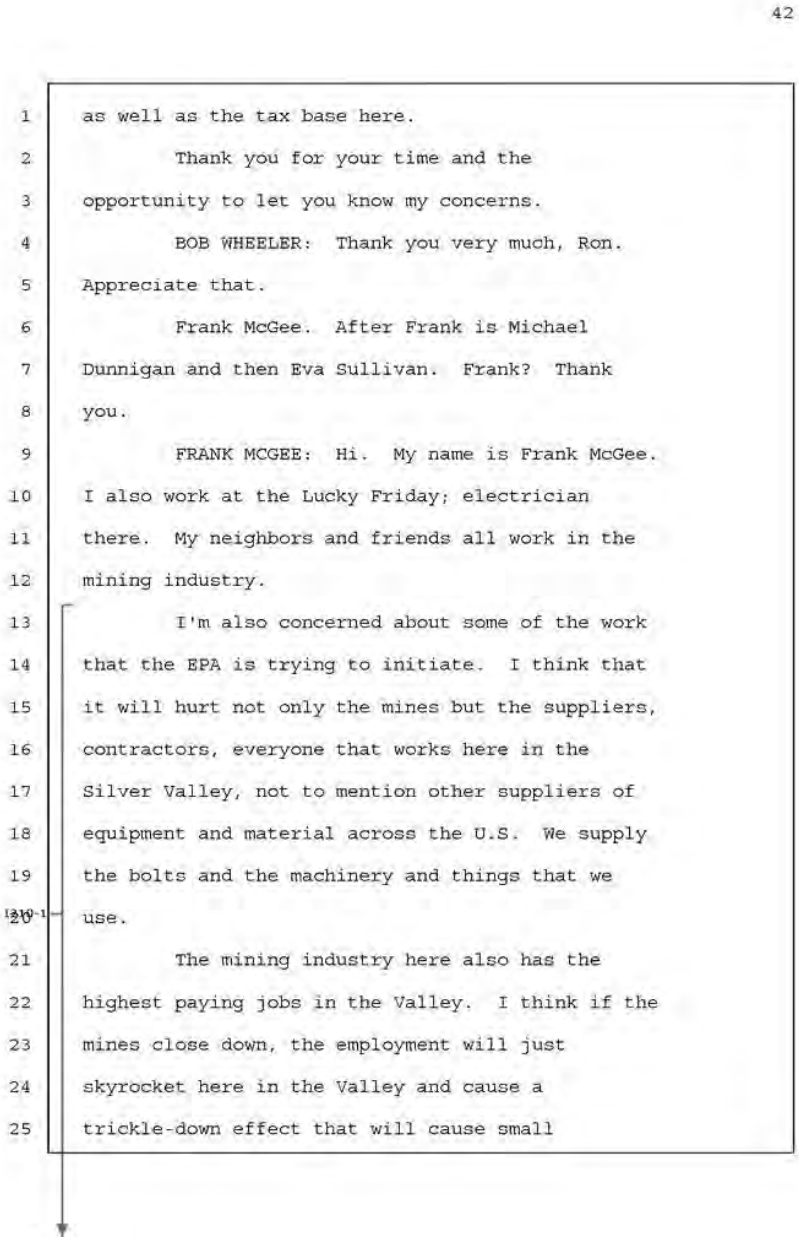
Response to comment I404-1

See response to Comment No. I351-1.

Response to comment I404-2

See responses to Comment Nos. I295-3 and LJ39-5.

McGee, Frank, I210, Letter 610097-5



42

as well as the tax base here.

Thank you for your time and the opportunity to let you know my concerns.

BOB WHEELER: Thank you very much, Ron. Appreciate that.

Frank McGee. After Frank is Michael Dunnigan and then Eva Sullivan. Frank? Thank you.

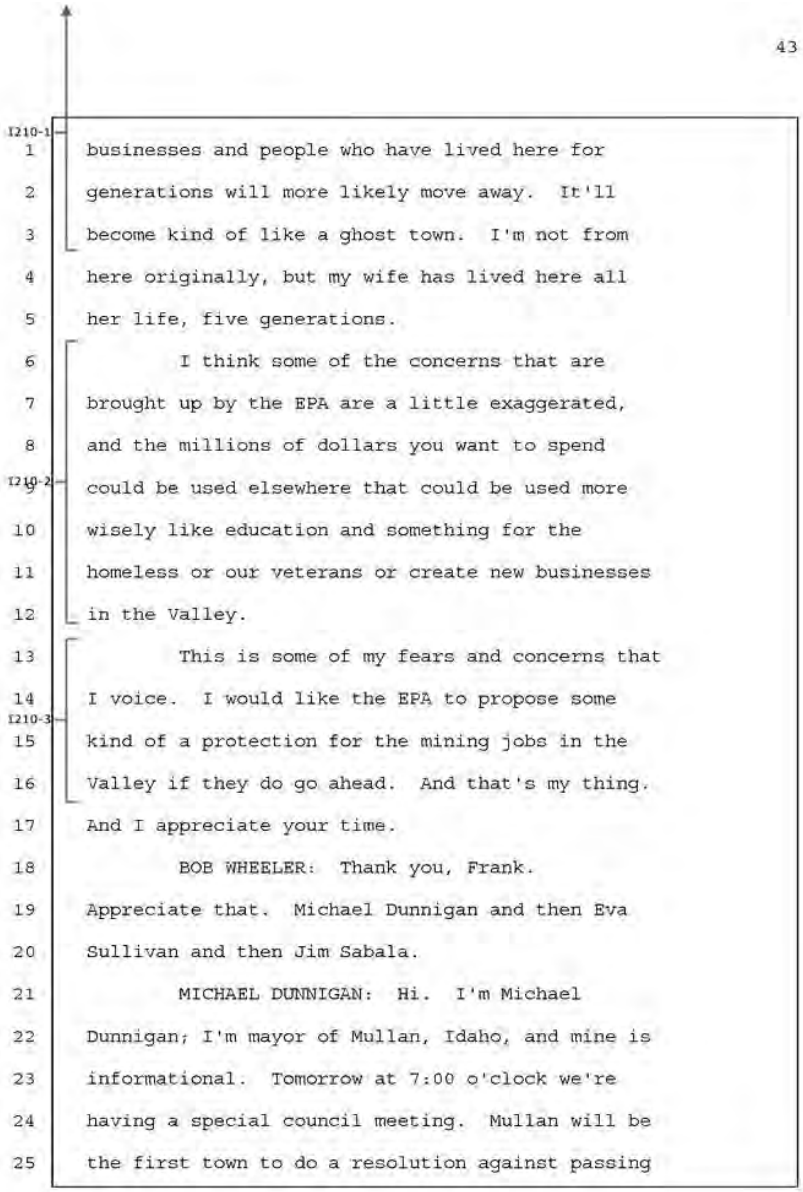
FRANK MCGEE: Hi. My name is Frank McGee. I also work at the Lucky Friday; electrician there. My neighbors and friends all work in the mining industry.

I'm also concerned about some of the work that the EPA is trying to initiate. I think that it will hurt not only the mines but the suppliers, contractors, everyone that works here in the Silver Valley, not to mention other suppliers of equipment and material across the U.S. We supply the bolts and the machinery and things that we use. I210-1

The mining industry here also has the highest paying jobs in the Valley. I think if the mines close down, the employment will just skyrocket here in the Valley and cause a trickle-down effect that will cause small

Response to comment I210-1

See response to Comment No. I58-5.



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I210-1
businesses and people who have lived here for generations will more likely move away. It'll become kind of like a ghost town. I'm not from here originally, but my wife has lived here all her life, five generations.

I think some of the concerns that are brought up by the EPA are a little exaggerated, and the millions of dollars you want to spend
I210-2
could be used elsewhere that could be used more wisely like education and something for the homeless or our veterans or create new businesses in the Valley.

This is some of my fears and concerns that I voice. I would like the EPA to propose some
I210-3
kind of a protection for the mining jobs in the Valley if they do go ahead. And that's my thing. And I appreciate your time.

BOB WHEELER: Thank you, Frank. Appreciate that. Michael Dunnigan and then Eva Sullivan and then Jim Sabala.

MICHAEL DUNNIGAN: Hi. I'm Michael Dunnigan; I'm mayor of Mullan, Idaho, and mine is informational. Tomorrow at 7:00 o'clock we're having a special council meeting. Mullan will be the first town to do a resolution against passing

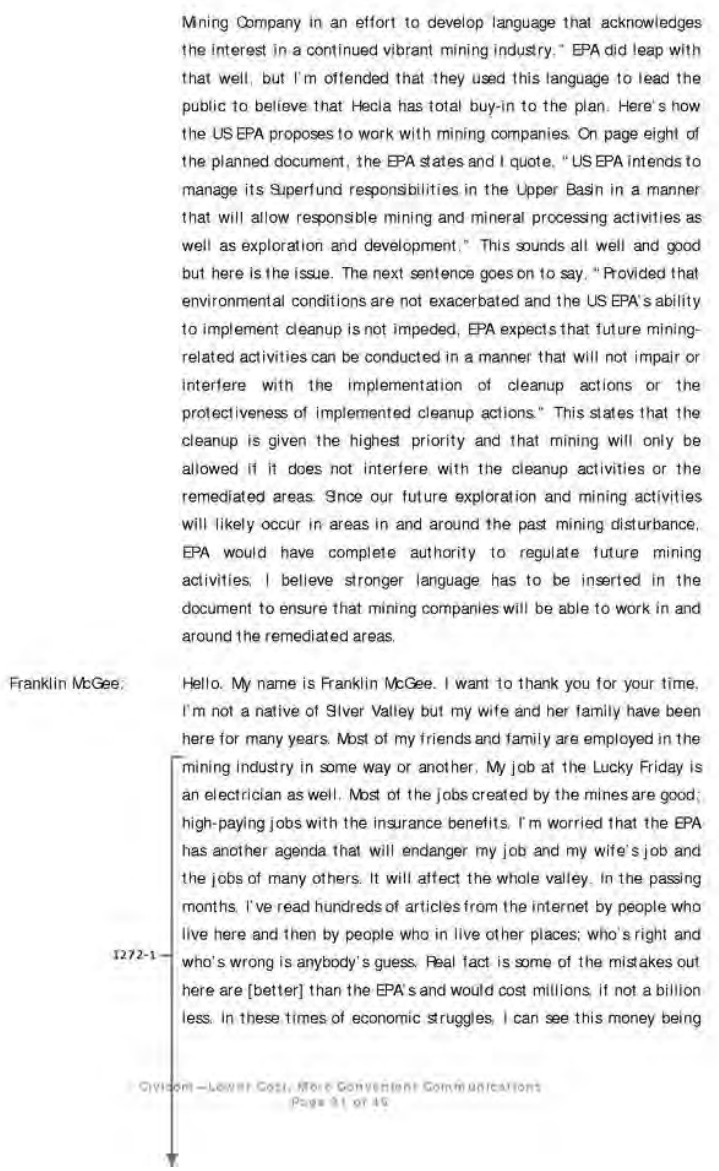
Response to comment I210-2

See responses to Comment Nos. I58-2 and I527-1.

Response to comment I210-3

See response to Comment No. I58-5.

McGee, Franklin, I272, Letter 616015-36



Mining Company in an effort to develop language that acknowledges the interest in a continued vibrant mining industry." EPA did leap with that well, but I'm offended that they used this language to lead the public to believe that Hecla has total buy-in to the plan. Here's how the US EPA proposes to work with mining companies. On page eight of the planned document, the EPA states and I quote, "US EPA intends to manage its Superfund responsibilities in the Upper Basin in a manner that will allow responsible mining and mineral processing activities as well as exploration and development." This sounds all well and good but here is the issue. The next sentence goes on to say, "Provided that environmental conditions are not exacerbated and the US EPA's ability to implement cleanup is not impeded, EPA expects that future mining-related activities can be conducted in a manner that will not impair or interfere with the implementation of cleanup actions or the protectiveness of implemented cleanup actions." This states that the cleanup is given the highest priority and that mining will only be allowed if it does not interfere with the cleanup activities or the remediated areas. Since our future exploration and mining activities will likely occur in areas in and around the past mining disturbance, EPA would have complete authority to regulate future mining activities. I believe stronger language has to be inserted in the document to ensure that mining companies will be able to work in and around the remediated areas.

Franklin McGee: Hello. My name is Franklin McGee. I want to thank you for your time. I'm not a native of Silver Valley but my wife and her family have been here for many years. Most of my friends and family are employed in the mining industry in some way or another. My job at the Lucky Friday is an electrician as well. Most of the jobs created by the mines are good; high-paying jobs with the insurance benefits. I'm worried that the EPA has another agenda that will endanger my job and my wife's job and the jobs of many others. It will affect the whole valley. In the passing months, I've read hundreds of articles from the internet by people who live here and then by people who in live other places; who's right and who's wrong is anybody's guess. Real fact is some of the mistakes out here are [better] than the EPA's and would cost millions, if not a billion less. In these times of economic struggles, I can see this money being

I272-1

Civicom – Lower Cost, More Convenient Communications
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Response to comment I272-1

See response to Comment No. I58-5.

I272-1 used in a more wisely way. If the EPA forces its ROD amendment on us, I would like to see the EPA guarantee mining in the valley and writing that their jobs to be safe and that mining construction in the valley will continue, but I don't think that the EPA will employ everyone in the valley if they shut down the mines. When the [sort of] money is gone, where will the EPA guys go? What will these people that are left here do? I don't know but what I do know is I would like to grow old, retire here with my wife and grandchildren in this valley. Thank you very much.

I272-2

Susan Mitchell: I'm Susan Mitchell. I'm from Cataldo and I experienced all [the PMF] when that whole process was unfolding. I believe that there continues to be need for cleanup that has to be carefully evaluated as we proceed and that community involvement is critically important in whatever ways we move forward. So I just specifically like to say that I see there's really a need for technical assistance that the research that's done by EPA we seldom, almost never have any opportunity to bring in outside scientific evaluation to analyze outward. So this puts the community in a position of not knowing if that information is valid or if there are other possibilities that would be equally as effective or perhaps there would be a trade-off cost-wise and they would be viable alternatives. So I just want to put in a word for that. Thank you.

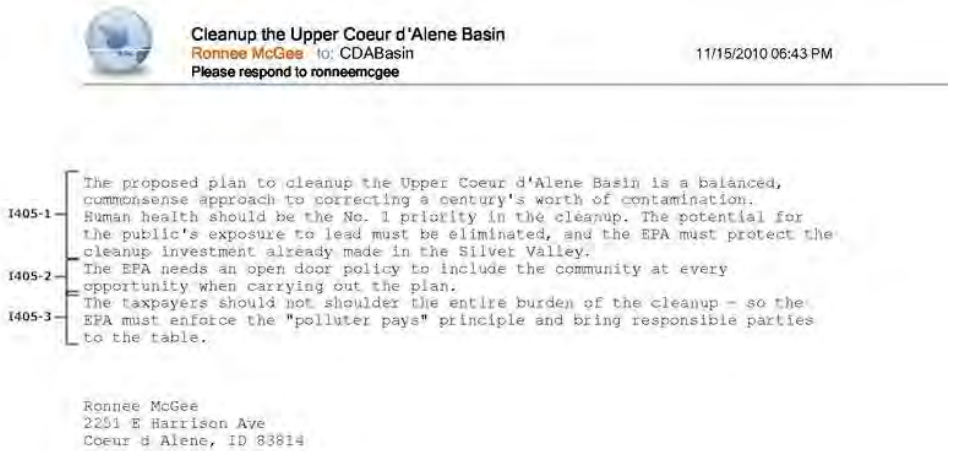
David Bond: I think the fact that's not widely understood is that mining is a truly global industry and so is the financing. In the last half dozen years or so, I have covered that aspect of it for a publisher in New York and I get around in the financial capitals of Europe and North America at least once a year; Paris, Zurich, London, Munich, Toronto, New York, Vancouver. I never realized till my first kind of swing through about half a dozen years ago just how famous Coeur d'Alene mining district is. Everybody in the financing end of financing capital-intensive projects like mining is [frivolous], but here's a regrettable mantra and I've heard one time over or 500 times. "Ah, the Silver Valley. Great district, fantastic silver, lead and zinc [we can do]. We'd love to be exploring or investing here but we'd be out of our minds to put a penny into that camp as long as you have those Superfund people running around." That's God's honest truth. So if you think the EPA has low credibility in this camp, consider it as equally - even lower credibility

Civicom—Lower Cost, More Convenient Communications
Page 32 of 46

Response to comment I272-2

Thank you for your comment.

McGee, Ronnee, I405, Letter 616301



Cleanup the Upper Coeur d'Alene Basin
Ronnee McGee to: CDABasin 11/15/2010 06:43 PM
Please respond to ronneemcgee

I405-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I405-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I405-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Ronnee McGee
2251 E Harrison Ave
Coeur d Alene, ID 83814

616301

Response to comment I405-1

See response to Comment No. I295-1.

Response to comment I405-2

See response to Comment No. I295-2.

Response to comment I405-3

See response to Comment No. I295-3.

McGillivray, Lena, I868, Letter 1365272

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Cleanup Office

Shoshone County

Editorial

By Dick Harwood, Idaho State Representative

Disingenuous. That's the only word to adequately describe the Environmental Protection Agency's (EPA) recent media-heavy attempts to paint themselves and their $1.3 billion, 50-90 year plan to expand cleanup in the Upper Coeur d'Alene Basin, in a favorable light to the people of North Idaho.

EPA released a Record of Decision (ROD) in 2002 to remediate historic mine waste in the Silver Valley. This ROD was a 30-year plan intended to address human health protection in Shoshone County. Despite the fact that blood-lead levels are now within acceptable limits, the EPA is proposing to expand cleanup efforts to address ecological issues already underway in the Valley.

Silver Valley residents are hopping mad, and rightfully so. Consider some of the elements of the proposed plan — 10 miles of plastic liner installed under the South Fork of the Coeur d'Alene River, removal of 12,000 to 19,000 gallons of groundwater per minute from the upper headwaters of the South Fork, construction of 59 miles of pipeline to move collected groundwater to the Central Treatment Plant, five to six new repositories each the size of East Mission Flats and enough soil to fill a 115-story building, and no assurances that the mining activities, which provide over 11 percent of Shoshone County's direct employment, will be allowed to continue.

Needless to say, public opposition to this plan is virtually unanimous. Hundreds of people showed up at public meetings in the valley last August to tell the EPA their plan is too expensive, too big and the wrong approach. Simply put, EPA has overstated the problem and the resultant cleanup plan.

EPA is undeterred, however. They have launched a media blitz which includes recurrent half-page ads in the local newspapers and media tours showcasing projects they claim their cleanup activities have had a positive impact on wildlife habitat.

There's just one problem — EPA isn't telling the whole truth. Recent stories have appeared in the local newspapers showcasing Moon Creek, a contaminated stream north of Kellogg, as an example of successful cleanup. These stories implied that the Moon Creek project was an EPA-directed cleanup. In reality, the U.S. Forest Service was responsible for that effort, not the EPA.

In another article, the EPA trumpets about a wetland improvement project near Rose Lake. This is an admirable project, but the problem is EPA suggests that this is an example of what they can accomplish in the Upper Basin. In reality, this Lower Basin project is completely different from what is being proposed for the Upper Basin. This project was a conservation easement on private property, with many agencies and volunteers involved. An EPA spokesman implied in the story that the formula they used on the project is easily exported to the Upper Basin. In reality, comparing this small project to the massive Upper Basin plan is comparing apples and oranges.

Perhaps most maddening however, are the series of ads EPA has placed in our local newspapers which attempt to help us all "understand the plan." These are nothing but desperate attempts by the agency to try and gain some level of support for a wildly unpopular and misguided plan.

I think its time for the EPA to leave the Silver Valley alone and go home —
Lena McGillivray

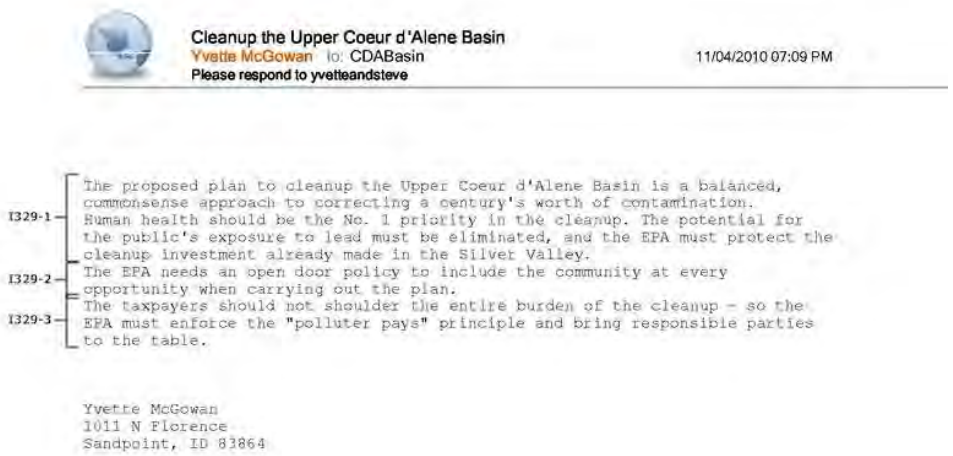
I868-1

USEPA SF
1365272

Response to comment I868-1

Comment noted.

McGowan, Yvette, I329, Letter 614459



Cleanup the Upper Coeur d'Alene Basin
Yvette McGowan to: CDABasin 11/04/2010 07:09 PM
Please respond to yvetteandsteve

I329-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I329-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I329-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Yvette McGowan
1011 N Florence
Sandpoint, ID 83864

614459

Response to comment I329-1

See response to Comment No. I295-1.

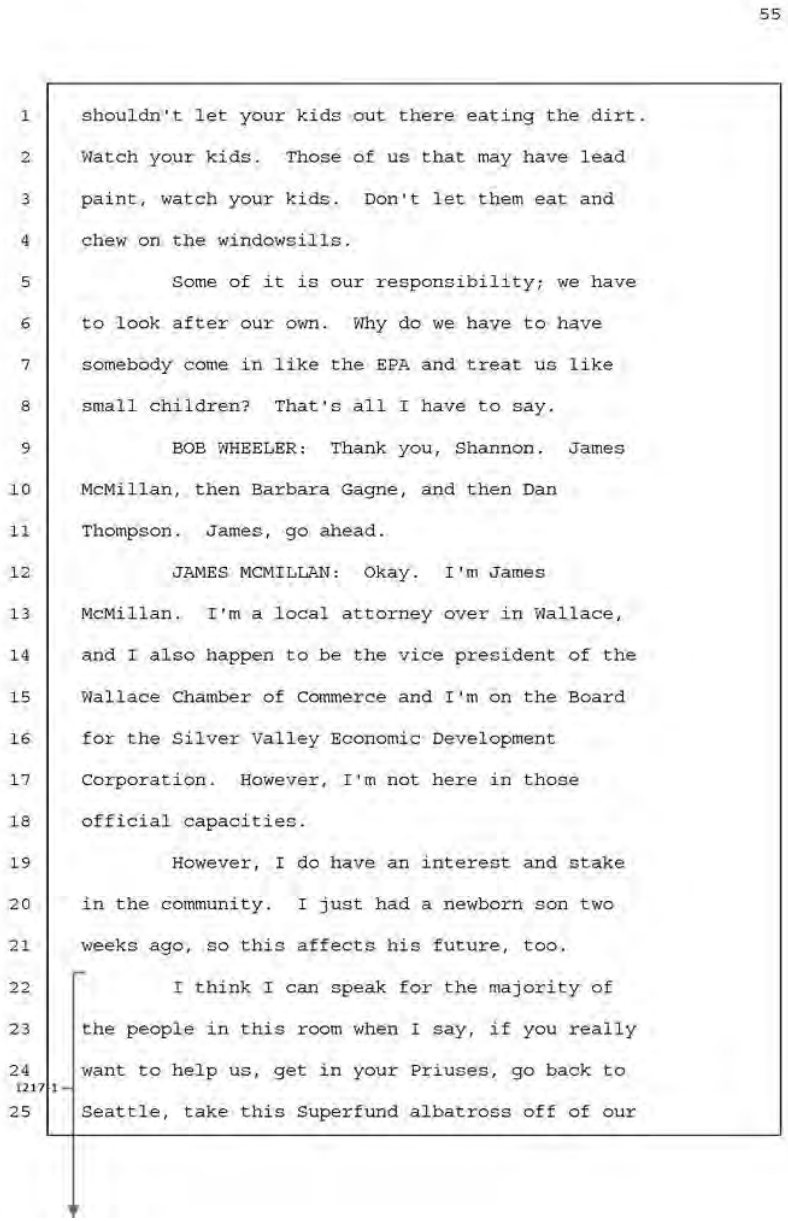
Response to comment I329-2

See response to Comment No. I295-2.

Response to comment I329-3

See response to Comment No. I295-3.

McMillan, James, I217, Letter 610097-12



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shouldn't let your kids out there eating the dirt. Watch your kids. Those of us that may have lead paint, watch your kids. Don't let them eat and chew on the windowsills.

Some of it is our responsibility; we have to look after our own. Why do we have to have somebody come in like the EPA and treat us like small children? That's all I have to say.

BOB WHEELER: Thank you, Shannon. James McMillan, then Barbara Gagne, and then Dan Thompson. James, go ahead.

JAMES MCMILLAN: Okay. I'm James McMillan. I'm a local attorney over in Wallace, and I also happen to be the vice president of the Wallace Chamber of Commerce and I'm on the Board for the Silver Valley Economic Development Corporation. However, I'm not here in those official capacities.

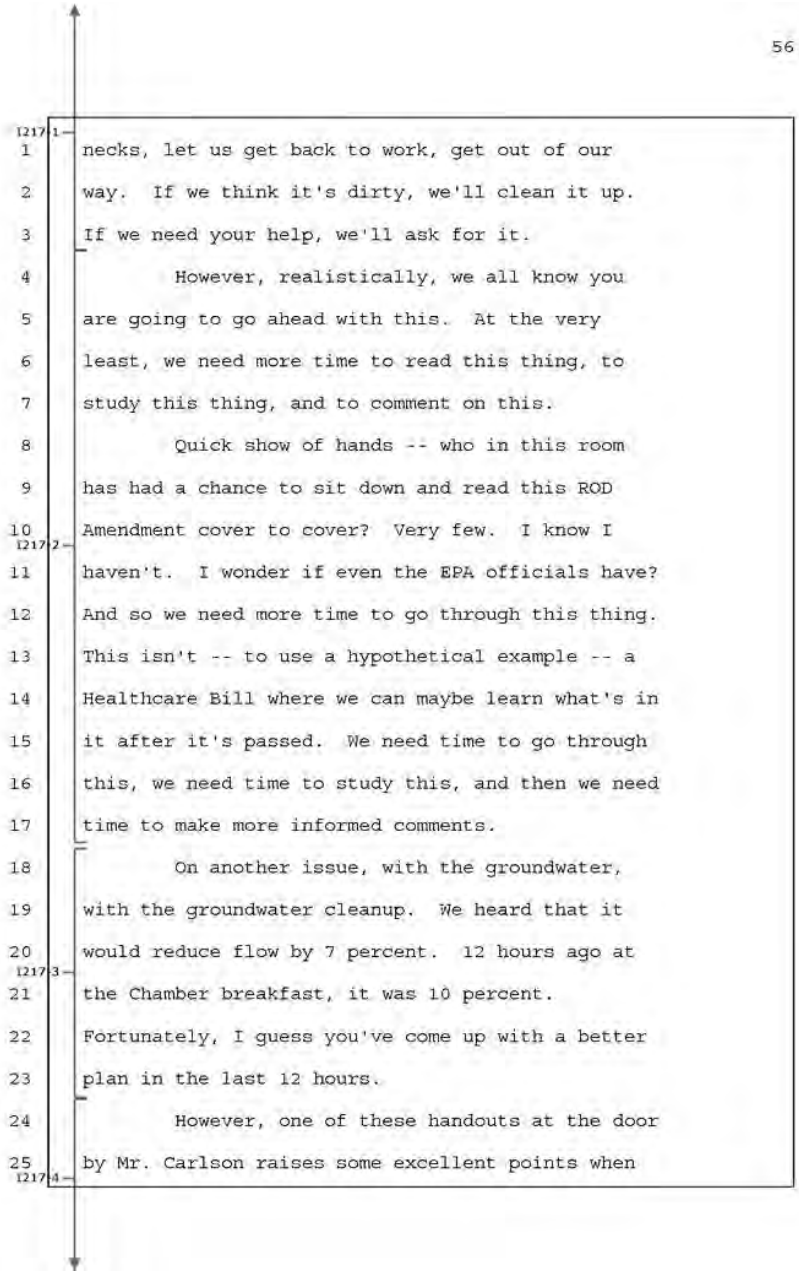
However, I do have an interest and stake in the community. I just had a newborn son two weeks ago, so this affects his future, too.

I think I can speak for the majority of the people in this room when I say, if you really want to help us, get in your Priuses, go back to Seattle, take this Superfund albatross off of our

I217-1

Response to comment I217-1

Comment noted.



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I217-1
necks, let us get back to work, get out of our way. If we think it's dirty, we'll clean it up. If we need your help, we'll ask for it.

However, realistically, we all know you are going to go ahead with this. At the very least, we need more time to read this thing, to study this thing, and to comment on this.

Quick show of hands -- who in this room has had a chance to sit down and read this ROD Amendment cover to cover? Very few. I know I
I217-2
haven't. I wonder if even the EPA officials have? And so we need more time to go through this thing. This isn't -- to use a hypothetical example -- a Healthcare Bill where we can maybe learn what's in it after it's passed. We need time to go through this, we need time to study this, and then we need time to make more informed comments.

On another issue, with the groundwater, with the groundwater cleanup. We heard that it would reduce flow by 7 percent. 12 hours ago at
I217-3
the Chamber breakfast, it was 10 percent. Fortunately, I guess you've come up with a better plan in the last 12 hours.

However, one of these handouts at the door by Mr. Carlson raises some excellent points when
I217-4

Response to comment I217-2

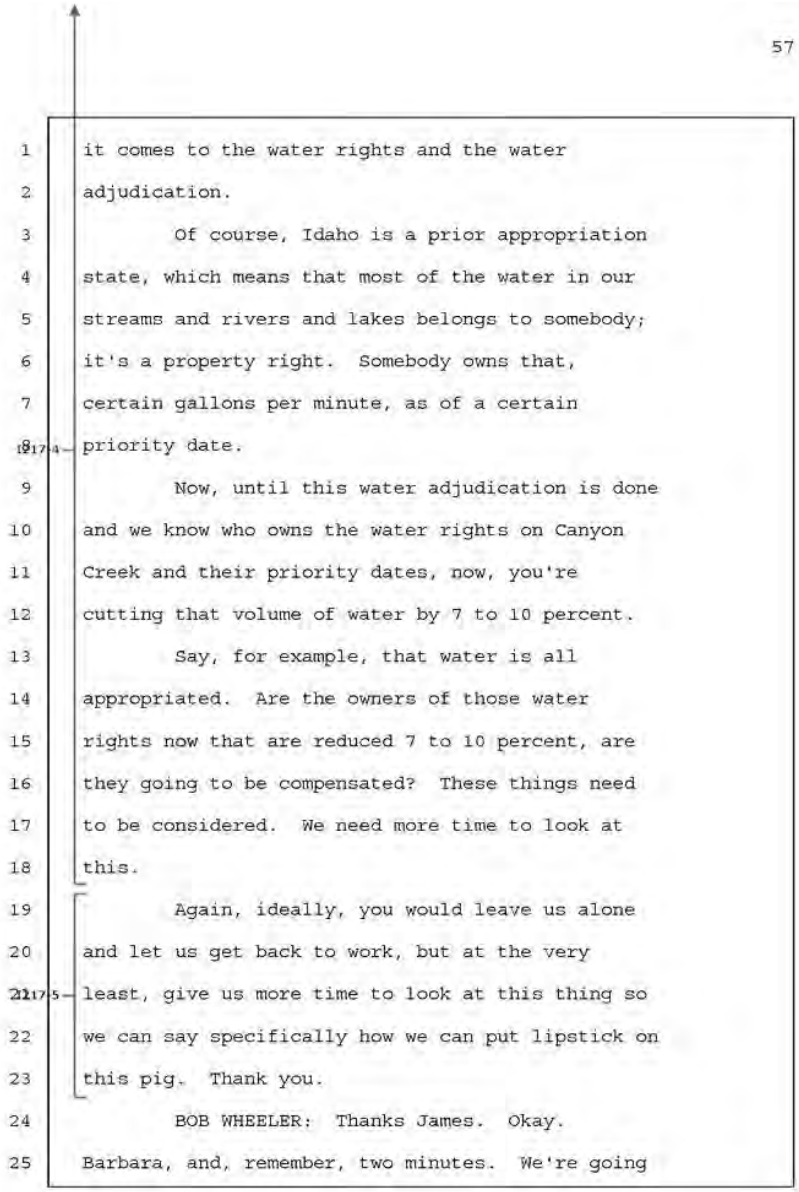
See response to Comment No. I54-6.

Response to comment I217-3

See response to Comment No. I54-8.

Response to comment I217-4

EPA does not believe implementing the Selected Remedy will interfere with any current private water uses and will not take any private property interests or private water rights in a manner that is in violation of the law or U.S. Constitution. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.



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it comes to the water rights and the water adjudication.

Of course, Idaho is a prior appropriation state, which means that most of the water in our streams and rivers and lakes belongs to somebody; it's a property right. Somebody owns that, certain gallons per minute, as of a certain priority date. I217-4

Now, until this water adjudication is done and we know who owns the water rights on Canyon Creek and their priority dates, now, you're cutting that volume of water by 7 to 10 percent.

Say, for example, that water is all appropriated. Are the owners of those water rights now that are reduced 7 to 10 percent, are they going to be compensated? These things need to be considered. We need more time to look at this.

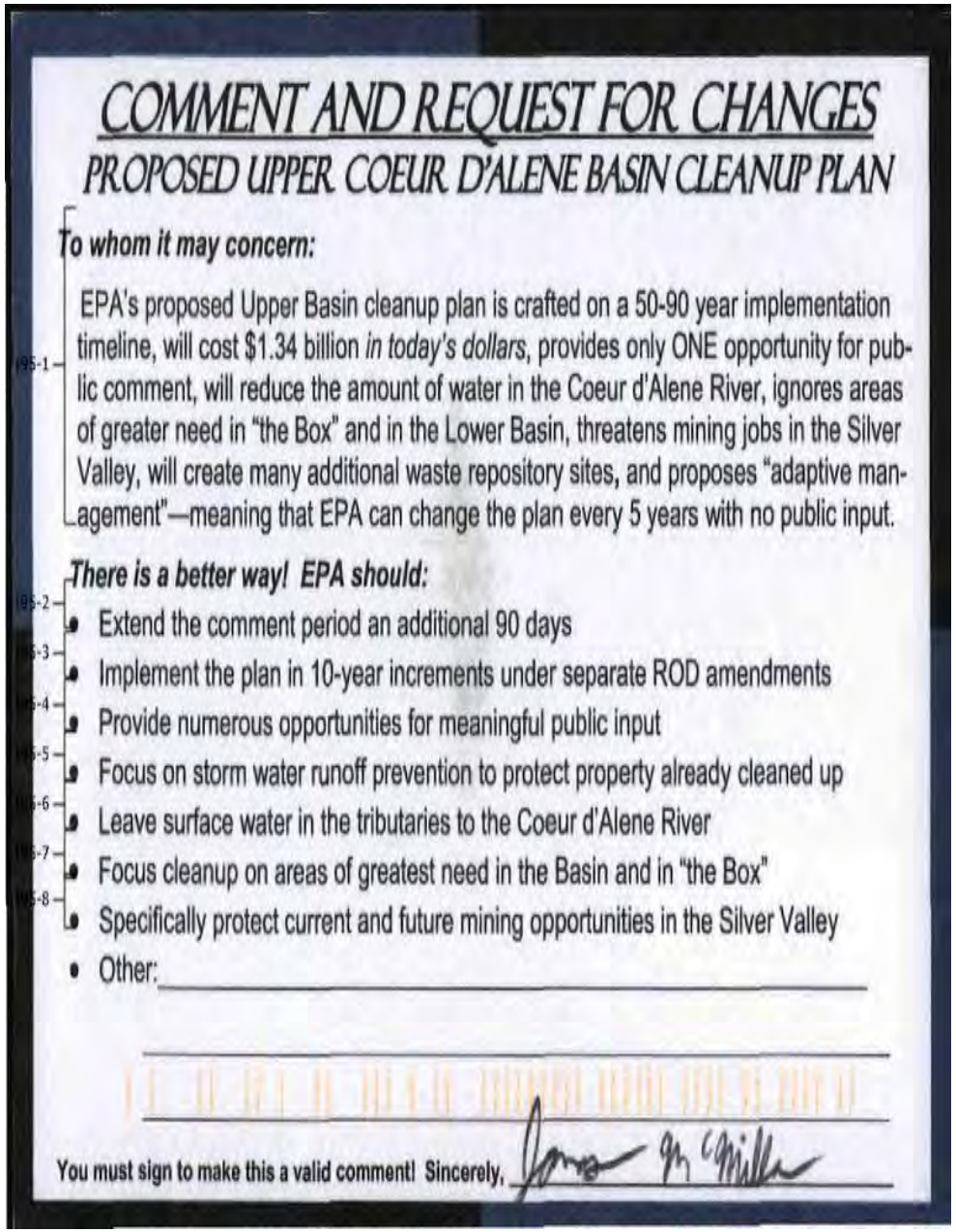
Again, ideally, you would leave us alone and let us get back to work, but at the very least, give us more time to look at this thing so I217-5 we can say specifically how we can put lipstick on this pig. Thank you.

BOB WHEELER: Thanks James. Okay. Barbara, and, remember, two minutes. We're going

Response to comment I217-5

See response to Comment No. I54-6.

McMillan, James, I95, Letter 1357142



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I95-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I95-2 Extend the comment period an additional 90 days
- I95-3 Implement the plan in 10-year increments under separate ROD amendments
- I95-4 Provide numerous opportunities for meaningful public input
- I95-5 Focus on storm water runoff prevention to protect property already cleaned up
- I95-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I95-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I95-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, James McMillan

Response to comment I95-1
See response to Comment No. I25-1.

Response to comment I95-2
See response to Comment No. I25-2.

Response to comment I95-3
See response to Comment No. I25-3.

Response to comment I95-4
See response to Comment No. I25-4.

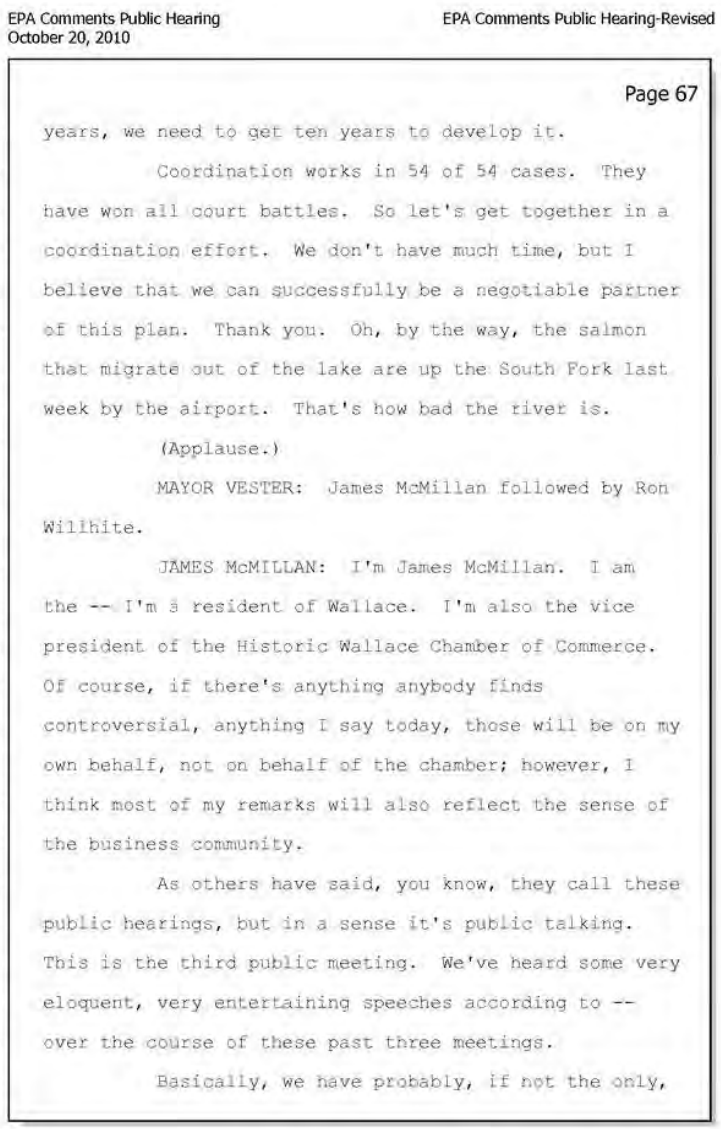
Response to comment I95-5
See response to Comment No. I25-5.

Response to comment I95-6
See response to Comment No. I25-6.

Response to comment I95-7
See response to Comment No. I25-7.

Response to comment I95-8
See response to Comment No. I25-8.

McMillan, James, I893, Letter 619651-26



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

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years, we need to get ten years to develop it.

Coordination works in 54 of 54 cases. They have won all court battles. So let's get together in a coordination effort. We don't have much time, but I believe that we can successfully be a negotiable partner of this plan. Thank you. Oh, by the way, the salmon that migrate out of the lake are up the South Fork last week by the airport. That's how bad the river is.

(Applause.)

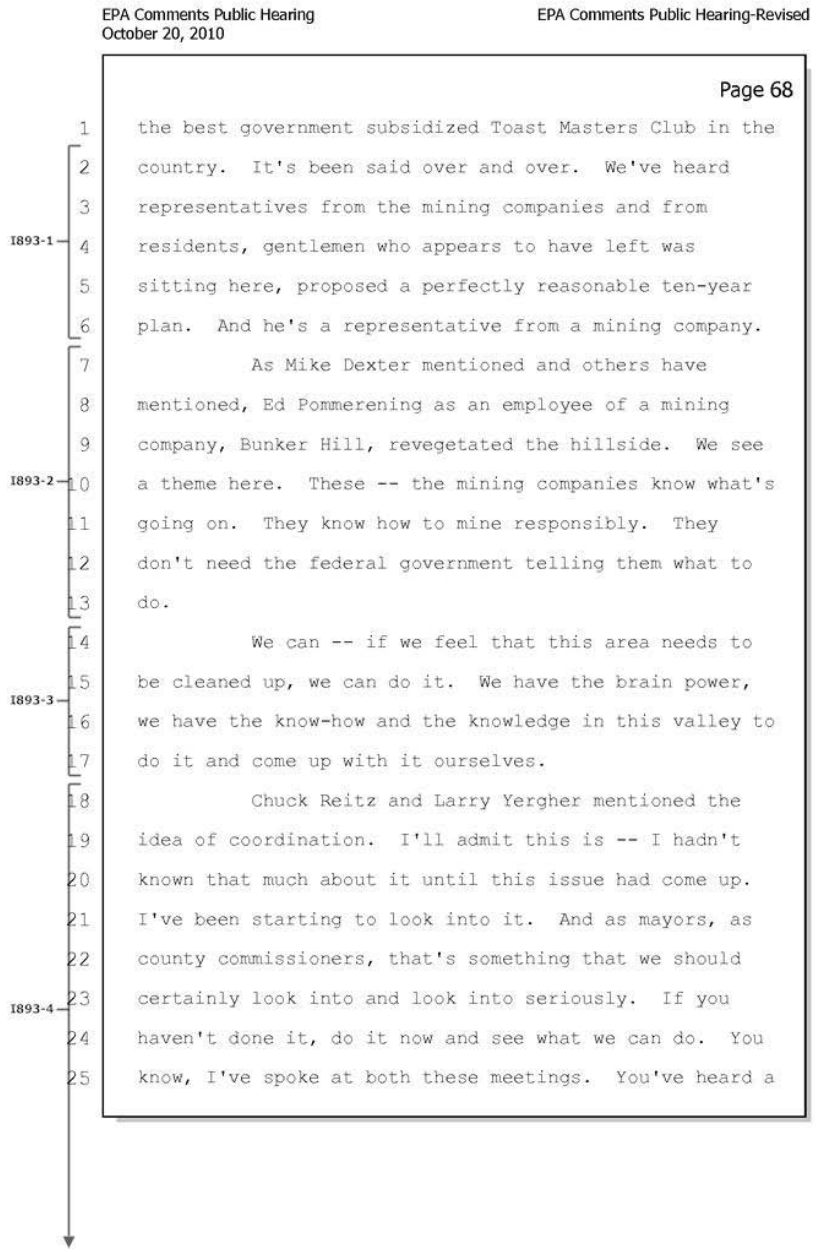
MAYOR VESTER: James McMillan followed by Ron Willhite.

JAMES McMILLAN: I'm James McMillan. I am the -- I'm a resident of Wallace. I'm also the vice president of the Historic Wallace Chamber of Commerce. Of course, if there's anything anybody finds controversial, anything I say today, those will be on my own behalf, not on behalf of the chamber; however, I think most of my remarks will also reflect the sense of the business community.

As others have said, you know, they call these public hearings, but in a sense it's public talking. This is the third public meeting. We've heard some very eloquent, very entertaining speeches according to -- over the course of these past three meetings.

Basically, we have probably, if not the only,

No comments



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

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the best government subsidized Toast Masters Club in the country. It's been said over and over. We've heard representatives from the mining companies and from residents, gentlemen who appears to have left was sitting here, proposed a perfectly reasonable ten-year plan. And he's a representative from a mining company.

I893-1

As Mike Dexter mentioned and others have mentioned, Ed Pommerening as an employee of a mining company, Bunker Hill, revegetated the hillside. We see a theme here. These -- the mining companies know what's going on. They know how to mine responsibly. They don't need the federal government telling them what to do.

I893-2

We can -- if we feel that this area needs to be cleaned up, we can do it. We have the brain power, we have the know-how and the knowledge in this valley to do it and come up with it ourselves.

I893-3

Chuck Reitz and Larry Yergher mentioned the idea of coordination. I'll admit this is -- I hadn't known that much about it until this issue had come up. I've been starting to look into it. And as mayors, as county commissioners, that's something that we should certainly look into and look into seriously. If you haven't done it, do it now and see what we can do. You know, I've spoke at both these meetings. You've heard a

I893-4

Response to comment I893-1

See response to Comment No. I474-2.

Response to comment I893-2

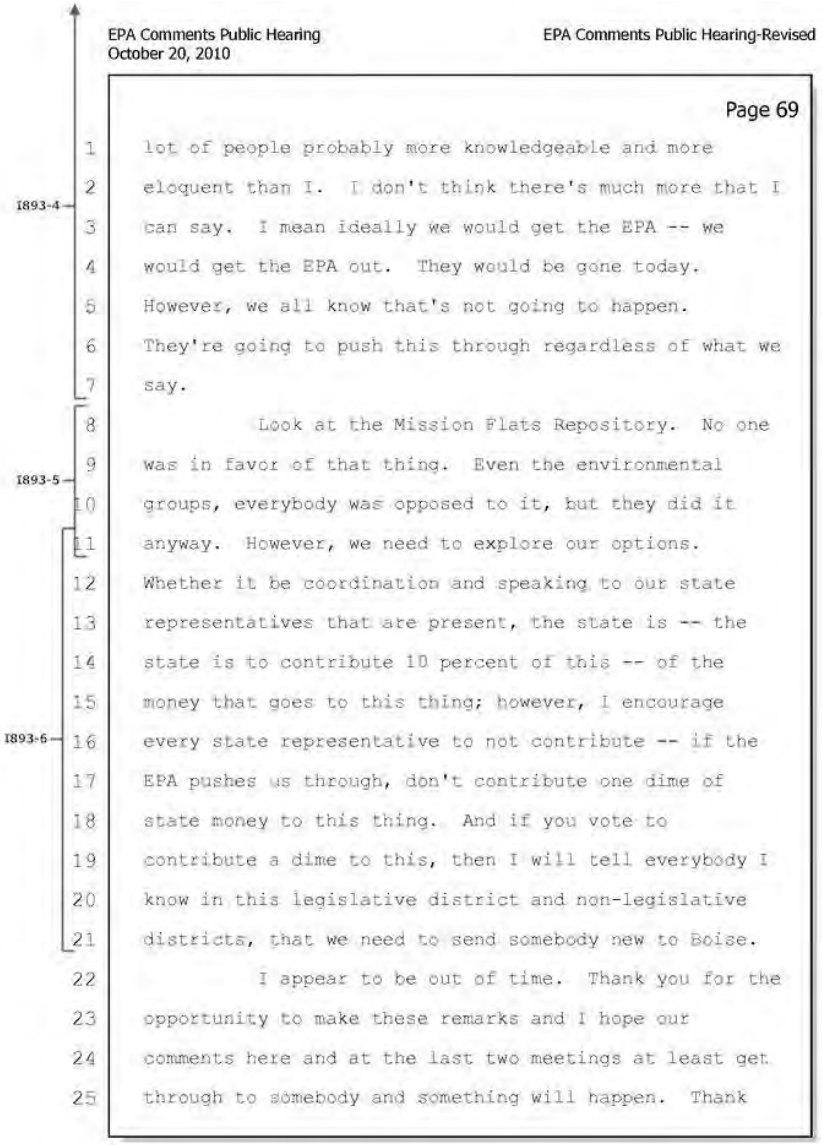
Comment noted.

Response to comment I893-3

Thank you for your comment.

Response to comment I893-4

EPA has provided a wide range of opportunities for community participation in the selection of a remedy for the Upper Basin. Since late 2008, EPA has hosted and/or attended about 60 meetings to share information and gather input for development of the FFS Report and the Proposed Plan. EPA has engaged local residents, elected officials, community groups, and many other stakeholders in the decision making process. This outreach has included working with the Basin Commission, its Technical Leadership Group, and the Citizens' Coordinating Council. EPA also submitted drafts of the Draft Final FFS Report to stakeholders and the Basin Commission's Upper Basin Project Focus Team for review and comment to assist EPA in preparing a final report. The ongoing involvement of the community will be an important part of the cleanup as it moves forward.



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lot of people probably more knowledgeable and more eloquent than I. I don't think there's much more that I can say. I mean ideally we would get the EPA -- we would get the EPA out. They would be gone today. However, we all know that's not going to happen. They're going to push this through regardless of what we say.

I893-4

Look at the Mission Flats Repository. No one was in favor of that thing. Even the environmental groups, everybody was opposed to it, but they did it anyway. However, we need to explore our options. Whether it be coordination and speaking to our state representatives that are present, the state is -- the state is to contribute 10 percent of this -- of the money that goes to this thing; however, I encourage every state representative to not contribute -- if the EPA pushes us through, don't contribute one dime of state money to this thing. And if you vote to contribute a dime to this, then I will tell everybody I know in this legislative district and non-legislative districts, that we need to send somebody new to Boise.

I893-5

I893-6

I appear to be out of time. Thank you for the opportunity to make these remarks and I hope our comments here and at the last two meetings at least get through to somebody and something will happen. Thank

Response to comment I893-5

See response to Comment No. LC21-9.

Response to comment I893-6

See response to Comment No. I295-3.

McMillian, James, LC10, Letter 616015-28

Sen. Mike Crapo: Bill.

Bill Mooney: I'm 57 years old. I work in [Aaron] mining industry and I'm a Burke-Canyon native. I am happy to say that I have two neighbors that are in their 90s that have drank the water, breathed the air, ate vegetables in their garden. As many people here would have the similar stories from their neighborhoods. I don't believe that you can do a credible study and exclude the good health and longevity of these people. Mining jobs are good jobs. Shoshone County needs all the jobs they can get, the state of Idaho needs. A 50- to 90-year open-ended cleanup with a moving target is simply unacceptable. Thank you.

Sen. Mike Crapo: Followed by Dan Thompson.

James McMillan: Yes. I'm James McMillan and while I'm just here on my individual capacity, I'm also vice president of the Historic Wallace Chamber of Commerce. I'm on the board for the Silver Valley Economic Development Corporation and I also sit on the Shoshone County Planning and Zoning Commission. First of all, I would urge everybody at that head table to pick up a copy of this book, read it thoroughly and study it. It's called North Idaho's Superfund, Facts and Fraud, written by two very intelligent, well-respected men in the mining industry, Fred Traxler and Bob Hopper. Second, I'd also like to say, Hap's a tough act to follow. I would act in resentment in saying that we don't need to be talking about how we're going to be paralyzing economic and industrial development in this valley for 50 to 90 years, if the EPA by its own admission has recognized that the human health hazard has pretty much gone. Blood lead levels are down to the national average and perhaps not coincidentally, just happened to occur along with the abatement of lead paint and removal of lead from the fuel. However, one major issue that was brought up at the last meeting and it bears repeating, is the issue of water rights, but the EPA has said that their plan to collect the ground water from –well it appears I'm out of time but...

LC10-1

Sen. Mike Crapo: [James], you can finish your thought.

LC10-2

James: Okay. The EPA's planning to collect the ground water from Canyon Creek and pipe it down to Kellogg for treatment that will reduce the

Civil am—Lower Cost, More Convenient Communications
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Response to comment LC10-1

Regarding the duration of the Selected Remedy, see response to Comment No. I58-1. As to human health risks, see response to Comment No. I295-1.

Response to comment LC10-2

See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

LC10-2

surface water 7% to 10% Now of course Idaho's prior appropriation statement that comes to water right. That water and [that flow] belong to somebody. That's of a certain thing. That's a property right. Therefore, before the state even considers approving this Record of Decision, there should be a firm commitment from the EPA that it will follow Idaho water law. Perhaps we even need to get the Department of Water Resources and some experienced water law attorneys to weigh in on this. However, in closing I would like to say to the governor that as this plan stands, when it's put on your desk, you need to recall a phrase from early in your political career and tell them, "Not just no but hell no." Thank you.

Dan Thompson: This is our state. It belongs to we, the people, not the federal government. The federal government has overstepped its bounds. It's put all these agencies out amongst our states to control. It's destroyed this nation, these agencies. The federal government doesn't even have power over these agencies any longer. So it's now in the hands of you, sir, Governor Otter, to say no to this ROD amendment. It's not needed here in the state of Idaho.

Male: Amen. Yes.

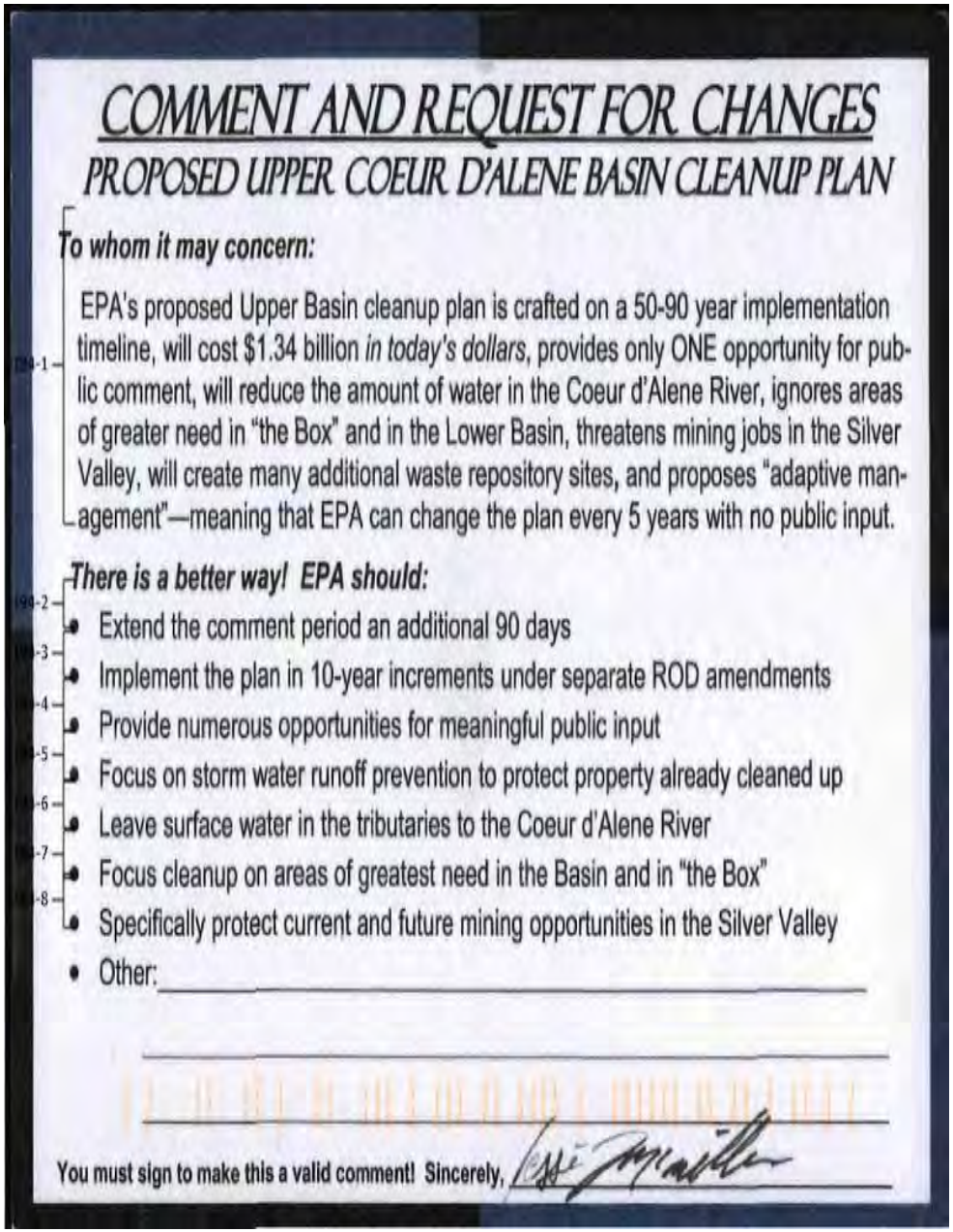
Dan Thompson: I asked at last Wednesday's meeting when I had the opportunity to speak, I challenged the EPA and I challenge them again if we do get this next 90-day window. Bring the records. At last Wednesday's meeting, you have all these charts and one important chart was missing and that is the premise for your reason for being here in the first place. And that is that our children are in danger of this lead poison. I ask the audience then, how many of you are damaged by lead poison? None of them. I asked, "Do you have any family members? Do you know of anybody?' Bring the documents and prove your position. I don't think you can do it.

Lee Haynes: I remember a trip that we made as a young science committee to Boise. We met with the governor, the lieutenant governor and several others and a fellow by the name of Steve Allred, then the director of DEQ. We were very excited about the fact that we had the found flaws that the EPA [signed this in one] to present that and did so. At the end

Civicom – Lower Cost, More Convenient Communications
Page 27 of 45

No comments

McMillan, Jessica, I94, Letter 1357141



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I94-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I94-2 Extend the comment period an additional 90 days
- I94-3 Implement the plan in 10-year increments under separate ROD amendments
- I94-4 Provide numerous opportunities for meaningful public input
- I94-5 Focus on storm water runoff prevention to protect property already cleaned up
- I94-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I94-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I94-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Jessi McMillan

Response to comment I94-1
See response to Comment No. I25-1.

Response to comment I94-2
See response to Comment No. I25-2.

Response to comment I94-3
See response to Comment No. I25-3.

Response to comment I94-4
See response to Comment No. I25-4.

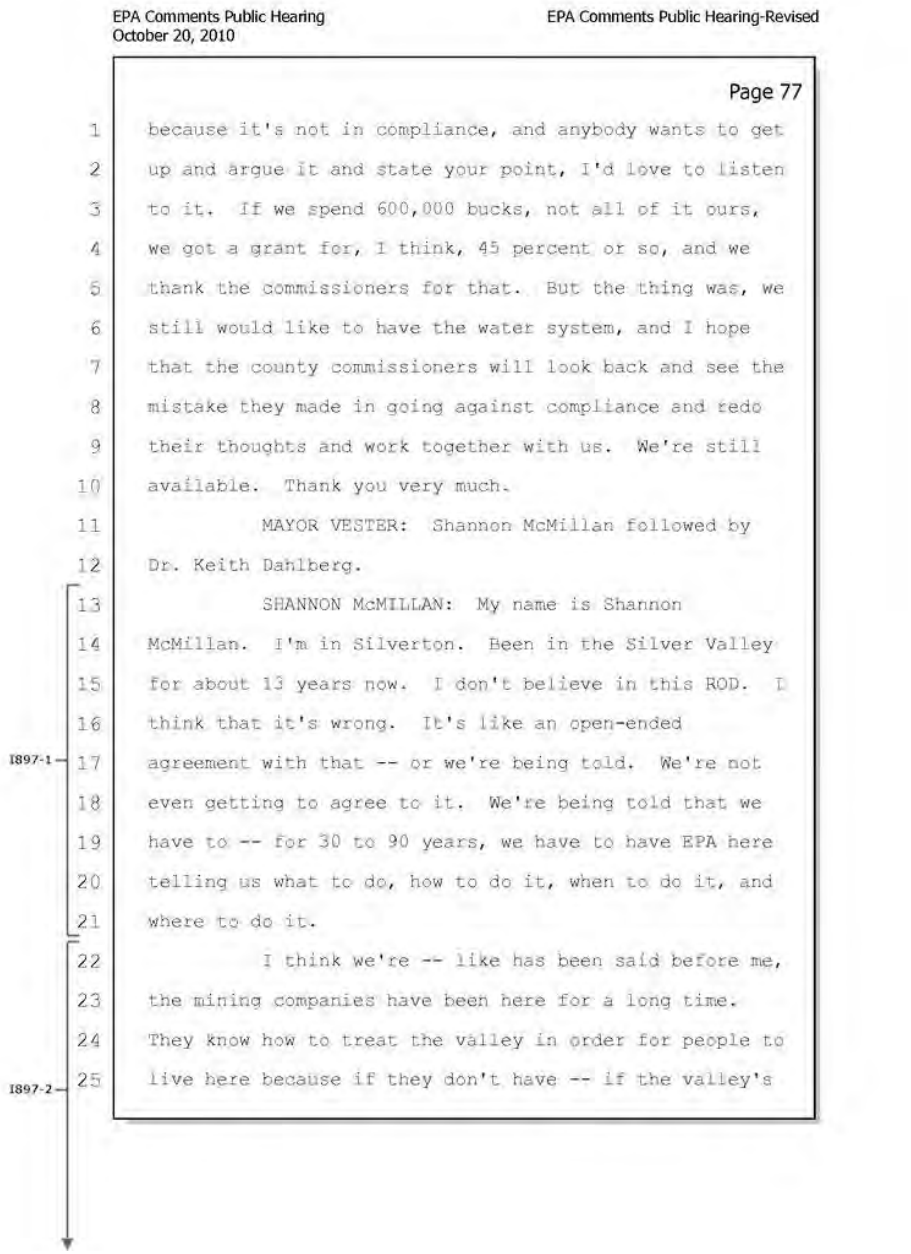
Response to comment I94-5
See response to Comment No. I25-5.

Response to comment I94-6
See response to Comment No. I25-6.

Response to comment I94-7
See response to Comment No. I25-7.

Response to comment I94-8
See response to Comment No. I25-8.

McMillan, Shannon, I897, Letter 619651-32



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because it's not in compliance, and anybody wants to get up and argue it and state your point, I'd love to listen to it. If we spend 600,000 bucks, not all of it ours, we got a grant for, I think, 45 percent or so, and we thank the commissioners for that. But the thing was, we still would like to have the water system, and I hope that the county commissioners will look back and see the mistake they made in going against compliance and redo their thoughts and work together with us. We're still available. Thank you very much.

MAYOR VESTER: Shannon McMillan followed by Dr. Keith Dahlberg.

SHANNON McMILLAN: My name is Shannon McMillan. I'm in Silverton. Been in the Silver Valley for about 13 years now. I don't believe in this ROD. I think that it's wrong. It's like an open-ended agreement with that -- or we're being told. We're not even getting to agree to it. We're being told that we have to -- for 30 to 90 years, we have to have EPA here telling us what to do, how to do it, when to do it, and where to do it.

I897-1

I think we're -- like has been said before me, the mining companies have been here for a long time. They know how to treat the valley in order for people to live here because if they don't have -- if the valley's

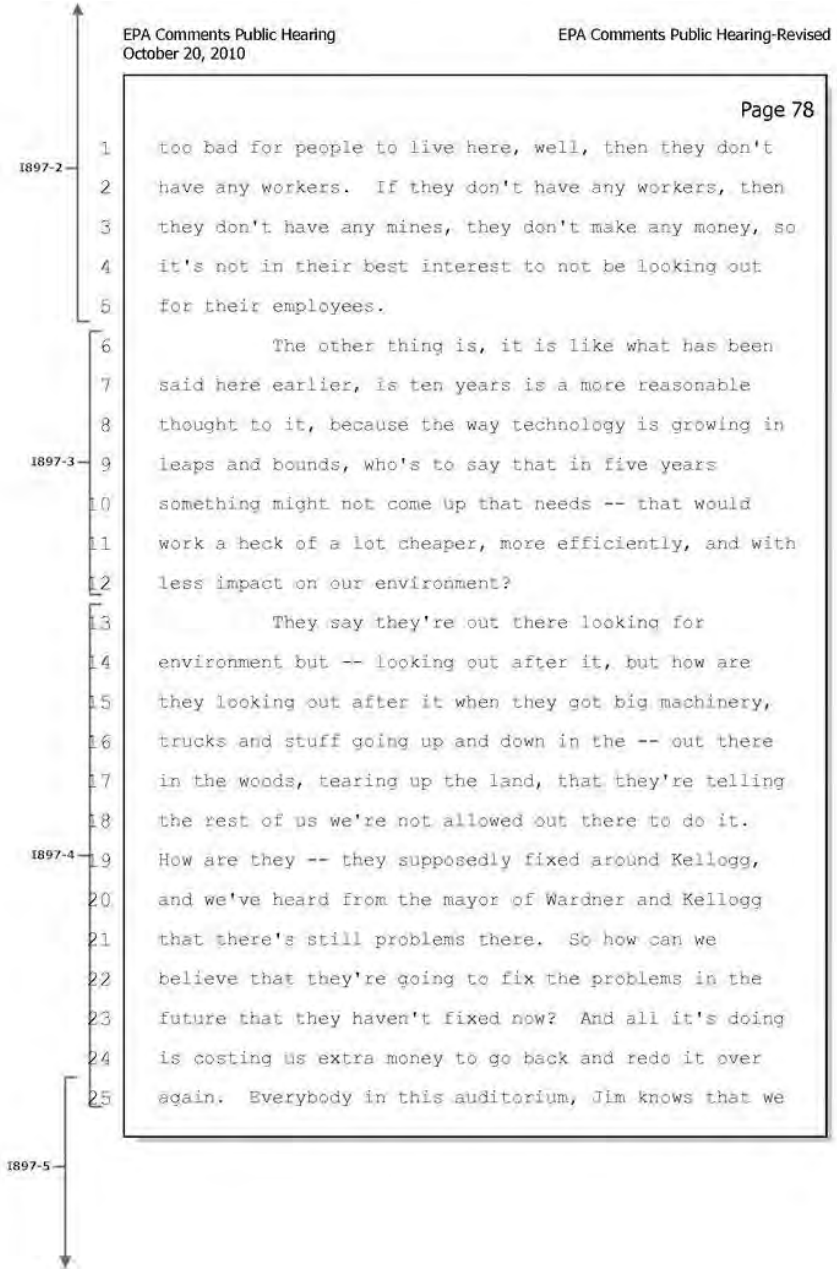
I897-2

Response to comment I897-1

See responses to Comment Nos. I58-1 and I295-2.

Response to comment I897-2

Comment noted.



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I897-2

too bad for people to live here, well, then they don't have any workers. If they don't have any workers, then they don't have any mines, they don't make any money, so it's not in their best interest to not be looking out for their employees.

The other thing is, it is like what has been said here earlier, is ten years is a more reasonable thought to it, because the way technology is growing in

I897-3

leaps and bounds, who's to say that in five years something might not come up that needs -- that would work a heck of a lot cheaper, more efficiently, and with less impact on our environment?

They say they're out there looking for environment but -- looking out after it, but how are they looking out after it when they got big machinery, trucks and stuff going up and down in the -- out there in the woods, tearing up the land, that they're telling the rest of us we're not allowed out there to do it.

I897-4

How are they -- they supposedly fixed around Kellogg, and we've heard from the mayor of Wardner and Kellogg that there's still problems there. So how can we believe that they're going to fix the problems in the future that they haven't fixed now? And all it's doing is costing us extra money to go back and redo it over again. Everybody in this auditorium, Jim knows that we

I897-5

Response to comment I897-3

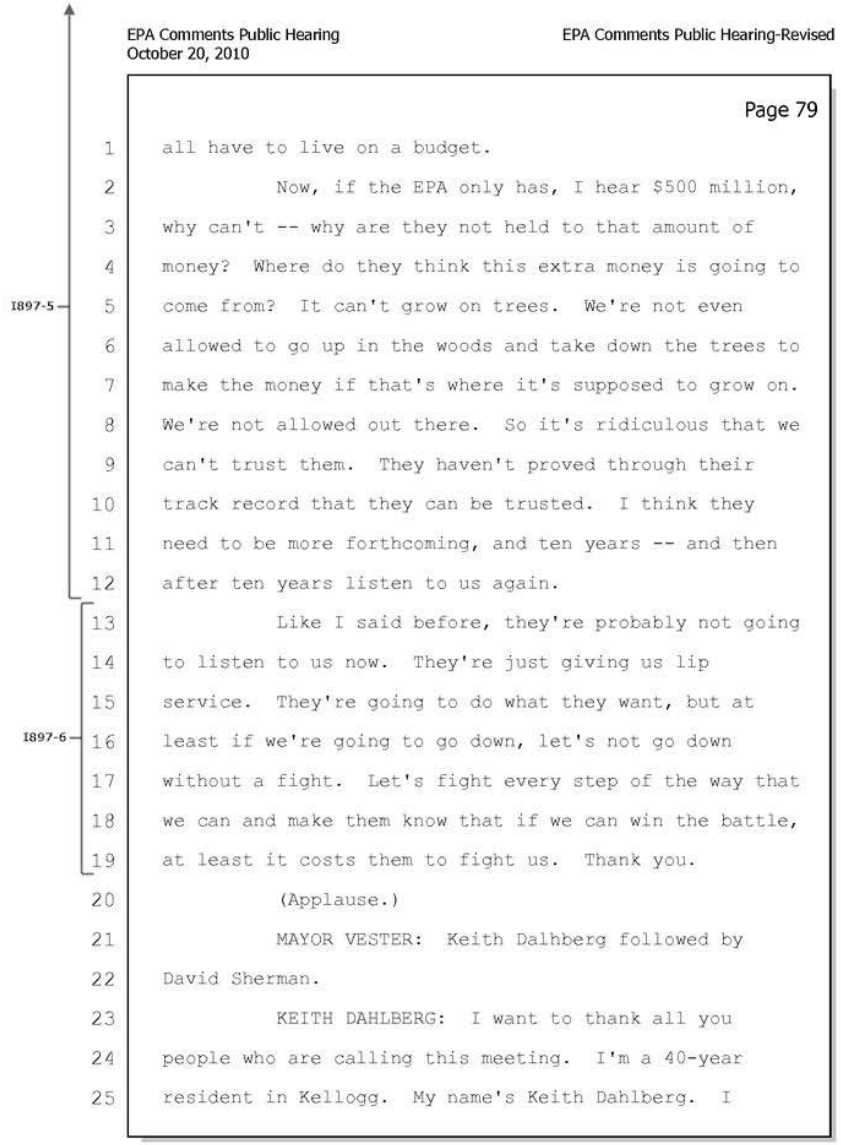
The Selected Remedy was designed to allow for the emergence of new technologies. As the cleanup is put into action, EPA will use an adaptive management process through which EPA will periodically review new information as the cleanup moves forward. "New information" may include the effectiveness of implemented remedial actions, the fate and transport of contaminants, and review of new technologies that may be applicable to the Upper Basin. Through ongoing adaptive management and the CERCLA Five-Year Review process, EPA anticipates using the information gained to make adjustments to implementation plans and to evaluate and implement new technologies where appropriate.

Response to comment I897-4

Regarding the funding of the Selected Remedy, see response to Comment No. I295-3.

Response to comment I897-5

See responses to Comment Nos. I58-2 and LJ11-2.



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all have to live on a budget.

Now, if the EPA only has, I hear $500 million, why can't -- why are they not held to that amount of money? Where do they think this extra money is going to come from? It can't grow on trees. We're not even allowed to go up in the woods and take down the trees to make the money if that's where it's supposed to grow on. We're not allowed out there. So it's ridiculous that we can't trust them. They haven't proved through their track record that they can be trusted. I think they need to be more forthcoming, and ten years -- and then after ten years listen to us again.

I897-5

Like I said before, they're probably not going to listen to us now. They're just giving us lip service. They're going to do what they want, but at least if we're going to go down, let's not go down without a fight. Let's fight every step of the way that we can and make them know that if we can win the battle, at least it costs them to fight us. Thank you.

I897-6

(Applause.)

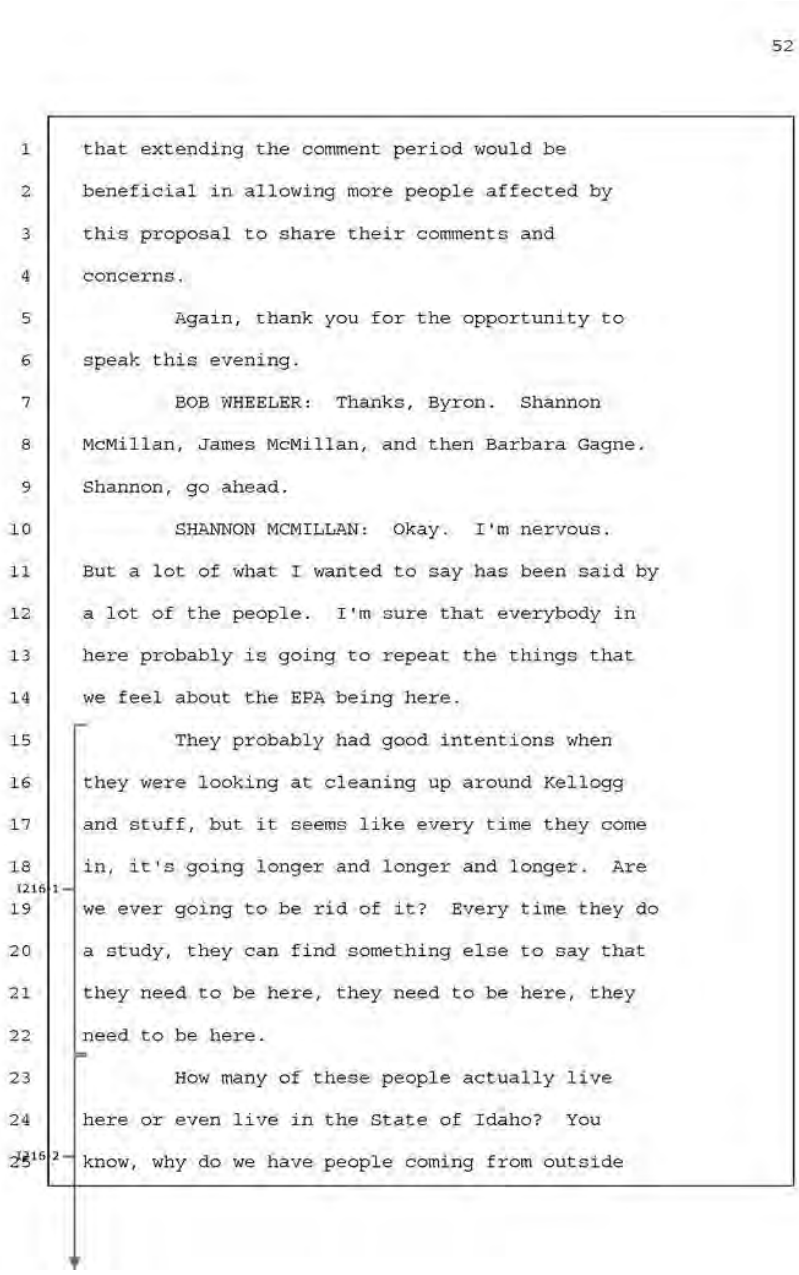
MAYOR VESTER: Keith Dalhberg followed by David Sherman.

KEITH DAHLBERG: I want to thank all you people who are calling this meeting. I'm a 40-year resident in Kellogg. My name's Keith Dahlberg. I

Response to comment I897-6

EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has made considerable effort to engage the public through all phases of its work. Most importantly, EPA has encouraged the public to provide comments and input on selection of the remedies for OUs 1, 2, and 3 and, most recently, the Selected Remedy for the Upper Basin. EPA has provided a wide range of opportunities for community participation in the selection of a remedy for the Upper Basin. Since late 2008, EPA has hosted and/or attended about 60 meetings to share information and gather input for development of the FFS Report and the Proposed Plan.

McMillan, Shannon, I216, Letter 610097-11



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that extending the comment period would be beneficial in allowing more people affected by this proposal to share their comments and concerns.

Again, thank you for the opportunity to speak this evening.

BOB WHEELER: Thanks, Byron. Shannon McMillan, James McMillan, and then Barbara Gagne. Shannon, go ahead.

SHANNON MCMILLAN: Okay. I'm nervous. But a lot of what I wanted to say has been said by a lot of the people. I'm sure that everybody in here probably is going to repeat the things that we feel about the EPA being here.

I216-1

They probably had good intentions when they were looking at cleaning up around Kellogg and stuff, but it seems like every time they come in, it's going longer and longer and longer. Are we ever going to be rid of it? Every time they do a study, they can find something else to say that they need to be here, they need to be here, they need to be here.

I216-2

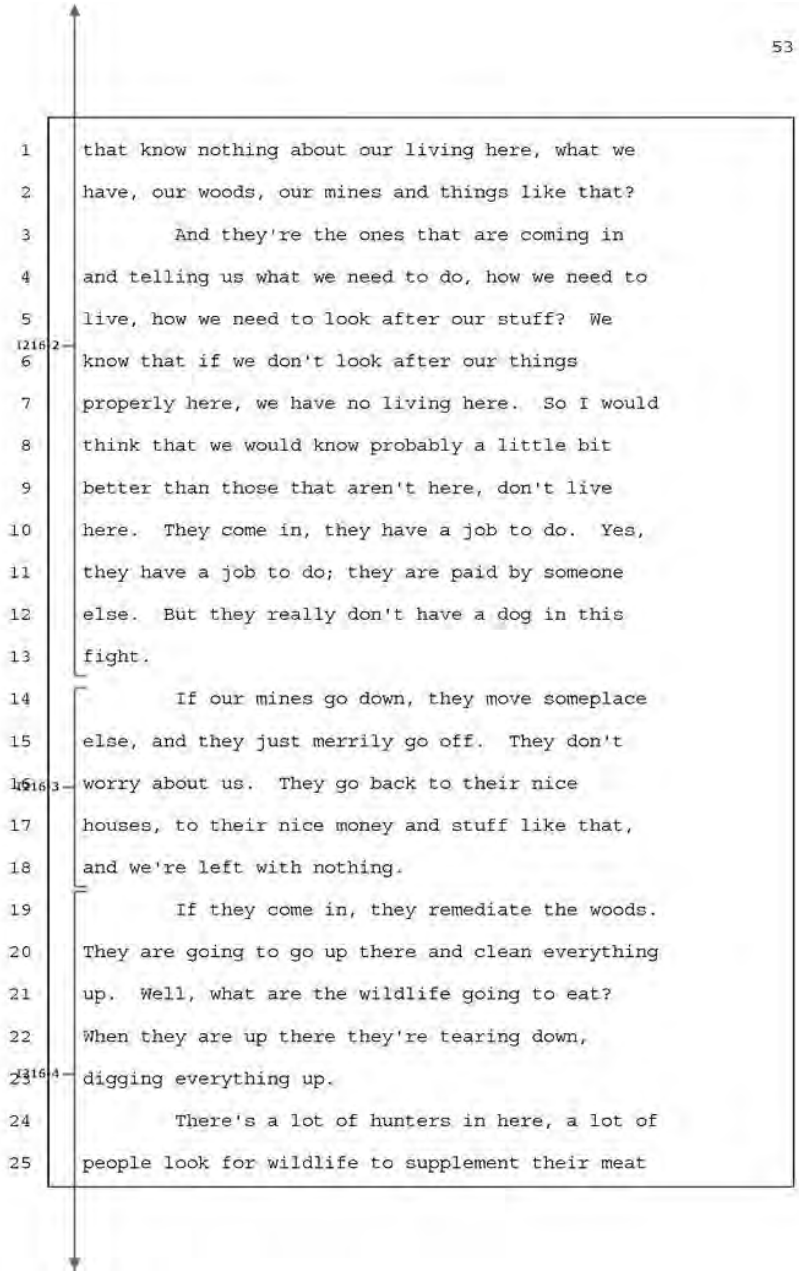
How many of these people actually live here or even live in the State of Idaho? You know, why do we have people coming from outside

Response to comment I216-1

See response to Comment No. I58-1.

Response to comment I216-2

Comment noted.



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that know nothing about our living here, what we have, our woods, our mines and things like that?

And they're the ones that are coming in and telling us what we need to do, how we need to live, how we need to look after our stuff? We I216-2 know that if we don't look after our things properly here, we have no living here. So I would think that we would know probably a little bit better than those that aren't here, don't live here. They come in, they have a job to do. Yes, they have a job to do; they are paid by someone else. But they really don't have a dog in this fight.

If our mines go down, they move someplace else, and they just merrily go off. They don't I216-3 worry about us. They go back to their nice houses, to their nice money and stuff like that, and we're left with nothing.

If they come in, they remediate the woods. They are going to go up there and clean everything up. Well, what are the wildlife going to eat? When they are up there they're tearing down, I216-4 digging everything up.

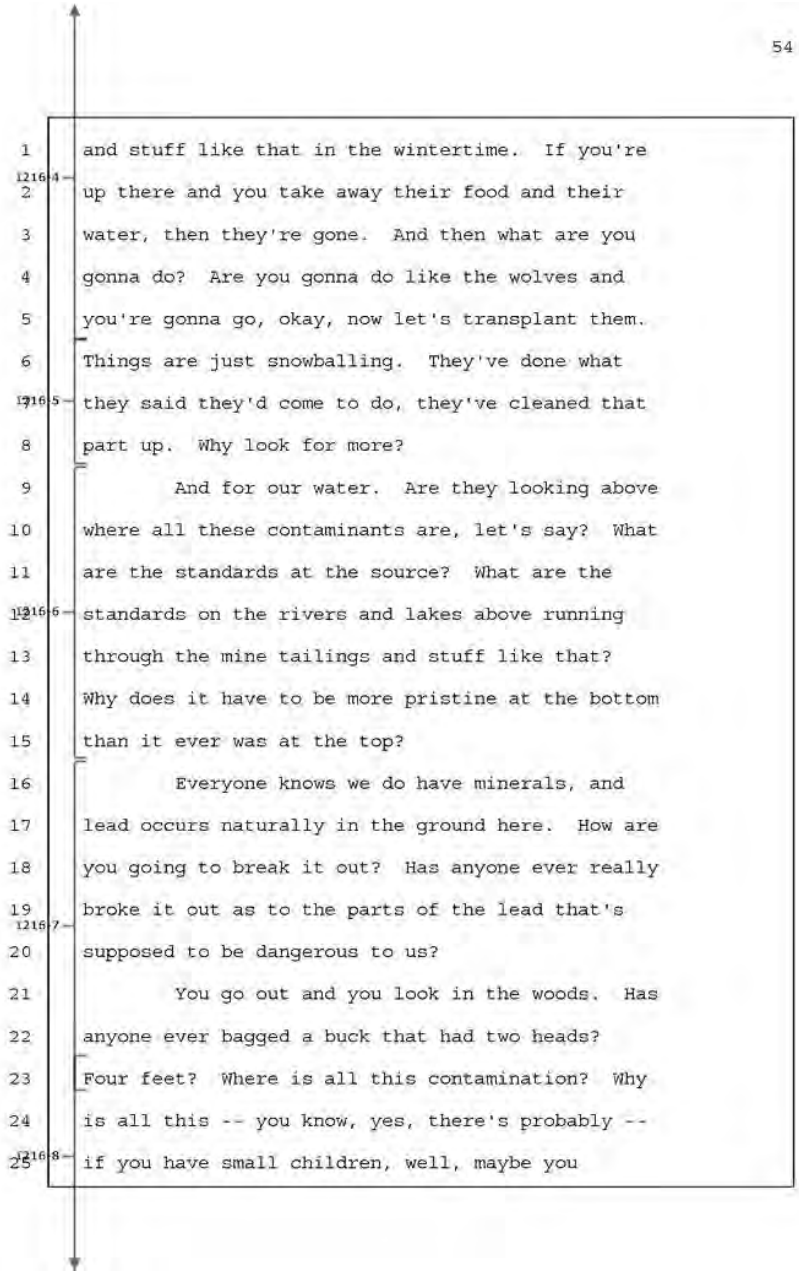
There's a lot of hunters in here, a lot of people look for wildlife to supplement their meat

Response to comment I216-3

See response to Comment No. I58-5.

Response to comment I216-4

See response to Comment No. I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. This reduction in scope limits the extent of cleanup activities and potential impacts to wildlife. In addition, cleanup actions will be implemented in phases over about 30 years and ultimately make the ecosystem healthier for wildlife.



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and stuff like that in the wintertime. If you're
I216-4 up there and you take away their food and their
water, then they're gone. And then what are you
gonna do? Are you gonna do like the wolves and
you're gonna go, okay, now let's transplant them.
Things are just snowballing. They've done what
I216-5 they said they'd come to do, they've cleaned that
part up. Why look for more?
And for our water. Are they looking above
where all these contaminants are, let's say? What
are the standards at the source? What are the
I216-6 standards on the rivers and lakes above running
through the mine tailings and stuff like that?
Why does it have to be more pristine at the bottom
than it ever was at the top?
Everyone knows we do have minerals, and
lead occurs naturally in the ground here. How are
you going to break it out? Has anyone ever really
broke it out as to the parts of the lead that's
I216-7 supposed to be dangerous to us?
You go out and you look in the woods. Has
anyone ever bagged a buck that had two heads?
Four feet? Where is all this contamination? Why
is all this -- you know, yes, there's probably --
I216-8 if you have small children, well, maybe you

Response to comment I216-5

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Response to comment I216-6

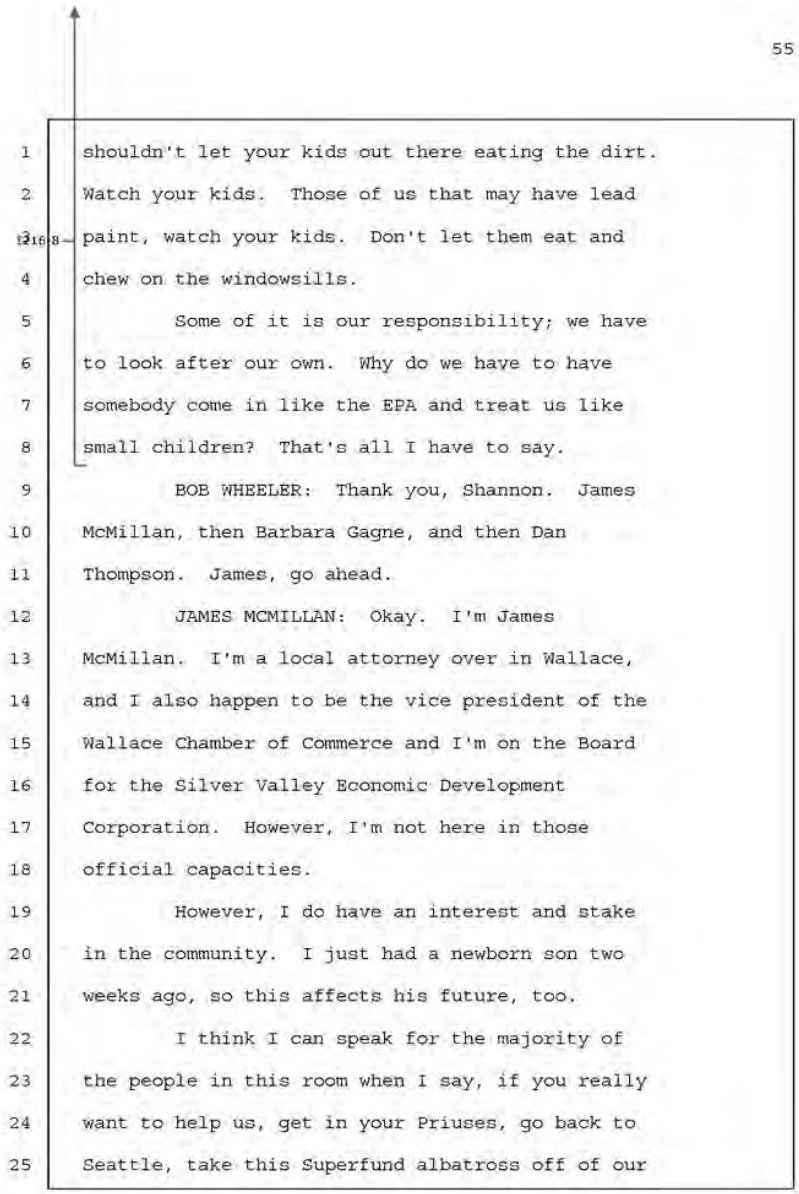
EPA is required by CERCLA to carry out the cleanup to meet applicable or relevant and appropriate requirements (ARARs) unless these are waived. The ARARs for protection of the environment in the Upper Basin are the site-specific surface water quality standards for cadmium, lead, and zinc developed by the State of Idaho (Idaho Administrative Procedures Act [IDAPA] 58.01.02.285). The site-specific criteria for lead and zinc are higher than the federal and state-wide criteria for protection of aquatic life, although they have been demonstrated to provide a comparable level of protectiveness within the SFCDR Watershed. The site-specific cadmium criterion is lower than the federal and state criteria. See response to Comment No. LC33-8 regarding background concentrations in the Coeur d'Alene Basin.

Response to comment I216-7

See response to Comment No. LC33-8.

Response to comment I216-8

See response to Comment No. I295-1.



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shouldn't let your kids out there eating the dirt. Watch your kids. Those of us that may have lead paint, watch your kids. Don't let them eat and chew on the windowsills.

Some of it is our responsibility; we have to look after our own. Why do we have to have somebody come in like the EPA and treat us like small children? That's all I have to say.

BOB WHEELER: Thank you, Shannon. James McMillan, then Barbara Gagne, and then Dan Thompson. James, go ahead.

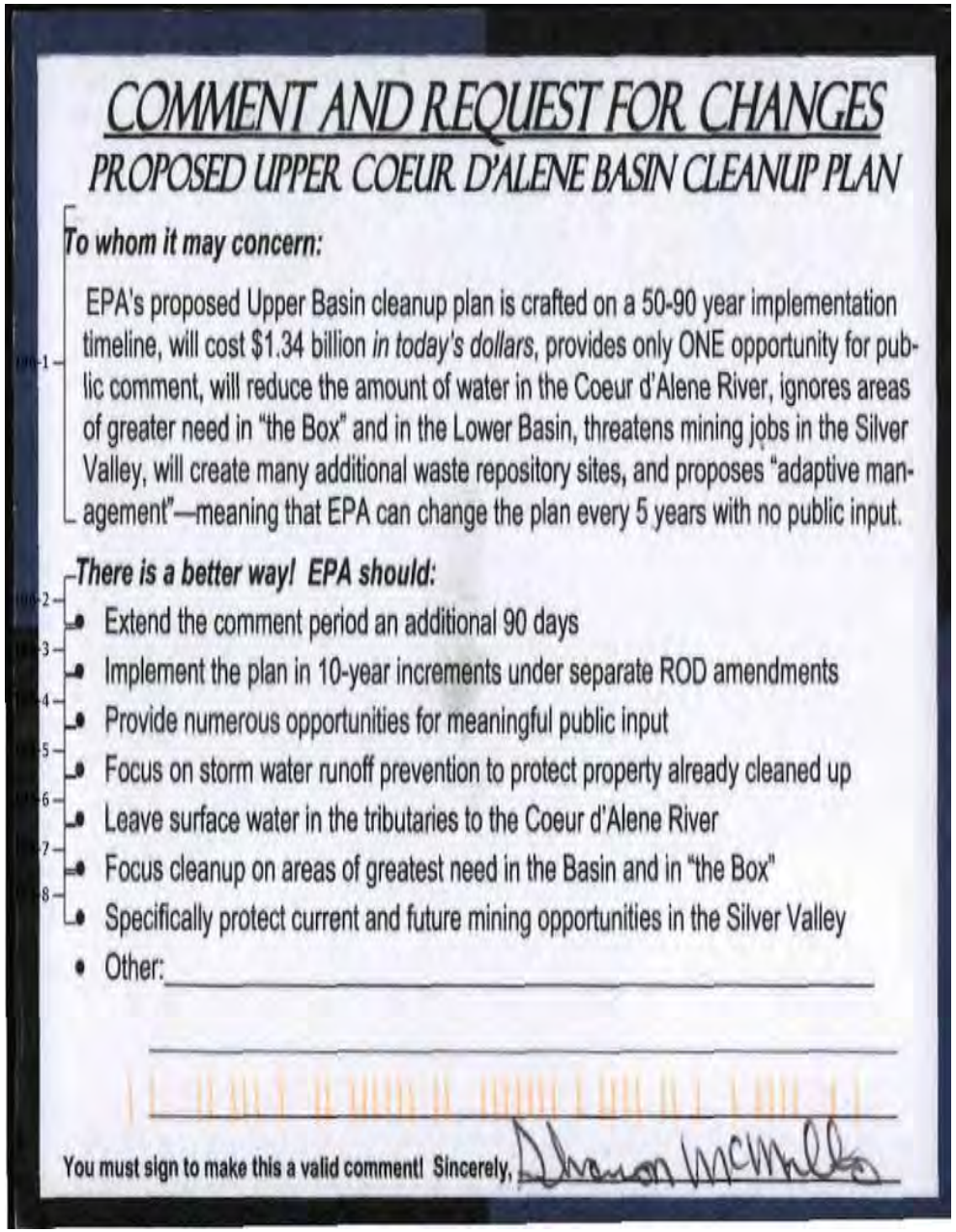
JAMES MCMILLAN: Okay. I'm James McMillan. I'm a local attorney over in Wallace, and I also happen to be the vice president of the Wallace Chamber of Commerce and I'm on the Board for the Silver Valley Economic Development Corporation. However, I'm not here in those official capacities.

However, I do have an interest and stake in the community. I just had a newborn son two weeks ago, so this affects his future, too.

I think I can speak for the majority of the people in this room when I say, if you really want to help us, get in your Priuses, go back to Seattle, take this Superfund albatross off of our

No comments

McMulls, Shanon, I96, Letter 1357143



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I96-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I96-2 • Extend the comment period an additional 90 days
I96-3 • Implement the plan in 10-year increments under separate ROD amendments
I96-4 • Provide numerous opportunities for meaningful public input
I96-5 • Focus on storm water runoff prevention to protect property already cleaned up
I96-6 • Leave surface water in the tributaries to the Coeur d'Alene River
I96-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
I96-8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, Shanon McMulls

Response to comment I96-1
See response to Comment No. I25-1.

Response to comment I96-2
See response to Comment No. I25-2.

Response to comment I96-3
See response to Comment No. I25-3.

Response to comment I96-4
See response to Comment No. I25-4.

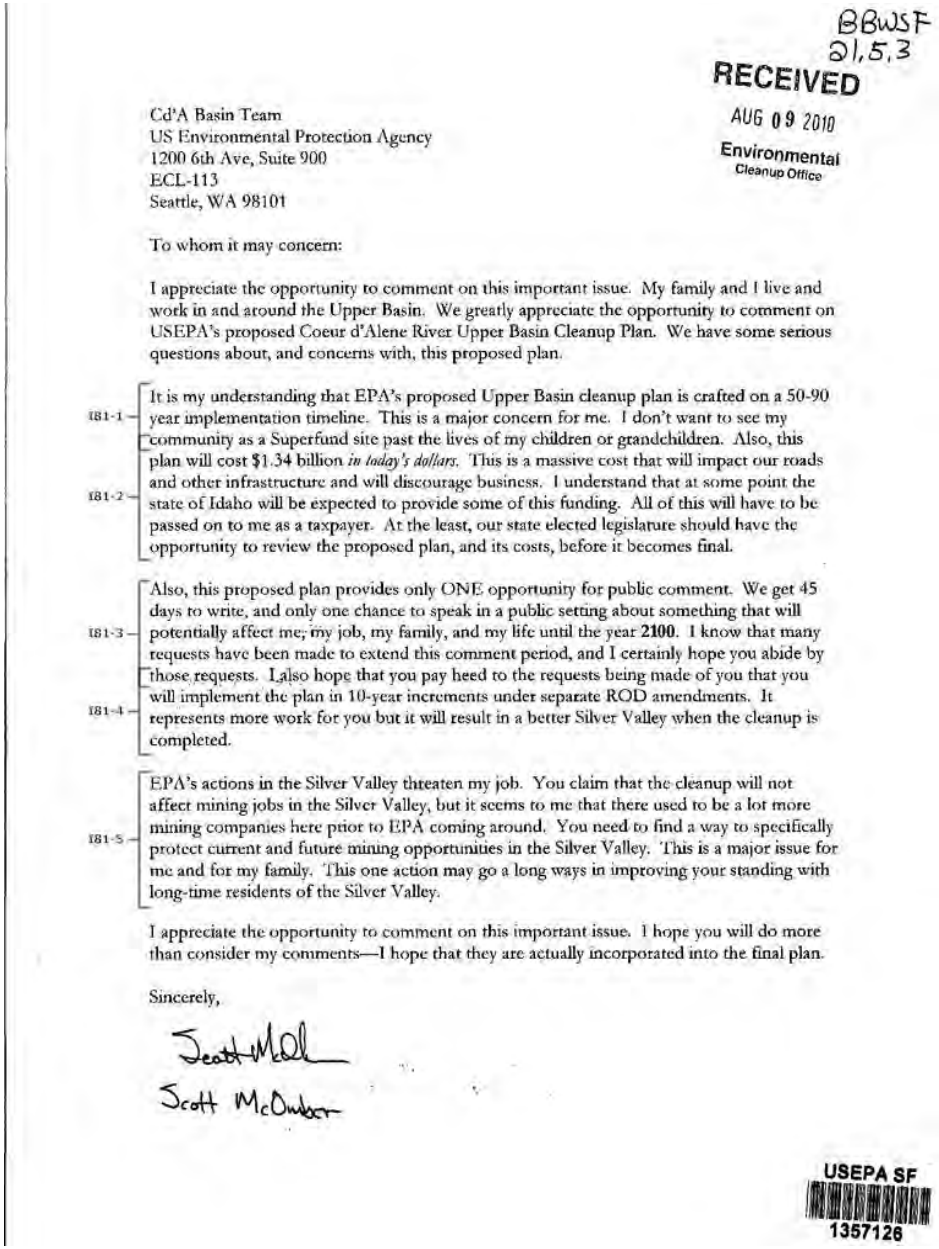
Response to comment I96-5
See response to Comment No. I25-5.

Response to comment I96-6
See response to Comment No. I25-6.

Response to comment I96-7
See response to Comment No. I25-7.

Response to comment I96-8
See response to Comment No. I25-8.

McOmber, Scott, I81, Letter 1357126



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RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I81-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the I81-2 state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will I81-3 potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It I81-4 represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more I81-5 mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Scott McOmber

USEPA SF
1357126

Response to comment I81-1
See response to Comment No. I58-1.

Response to comment I81-2
See response to Comment No. I58-2.

Response to comment I81-3
See response to Comment No. I58-3.

Response to comment I81-4
See response to Comment No. I58-4.

Response to comment I81-5
See response to Comment No. I58-5.

McPhail, Robert, I906, Letter 616303

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
retiredrescue1@live.com to: formsubmission 11/10/2010 12:59 PM
Sent by: Retiredrescue1@Live.Com <retiredrescue1=live.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Robert McPhail
Date: 11/10/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I906-1
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
It is time the EPA uses common sense and quits wasting taxpayers dollars with their dog and pony shows here in the Valley. The majority of residents in the Valley are opposed to the 90 year multi-billion dollar boondoggle being proposed. I906-2
I would like to see a complete audit of the money that has been wasted by both the EPA and Idaho DEQ.
Coeur d'Alene Basin Resident: Yes
Email Address: retiredrescue1@live.com
Mailing Address: Box 356, 122 W. Oak|Osburn|Idaho|83849|US
Phone Number: (208) 556-2535

616303

Response to comment I906-1

See response to Comment No. I351-1.

Response to comment I906-2

See response to Comment No. 158-1.

McPhail, Bob, I693, Letter 618303

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
retiredrescue1@live.com to: formsubmission 11/16/2010 01:01 PM
Sent by: Retiredrescue1@Live.Com <retiredrescue1=live.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Bob McPhail
Date: 11/16/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
How do you justify spending $3,000 to $4,000 dollars every week to spread your propaganda in the newspapers? I have a hard time reading the garbage when we are told thereis no money to fix roads and other infrastructure damaged or ruined by the so-called remediation. In case your liberal papers in Seattle havent't reported you lost in the election!
Coeur d'Alene Basin Resident: Yes
Email Address: retiredrescue1@live.com
Malling Address: Bxo 356|Osburn|Idaho|83849|US
Phone Number:

I693-1
I693-2

618303

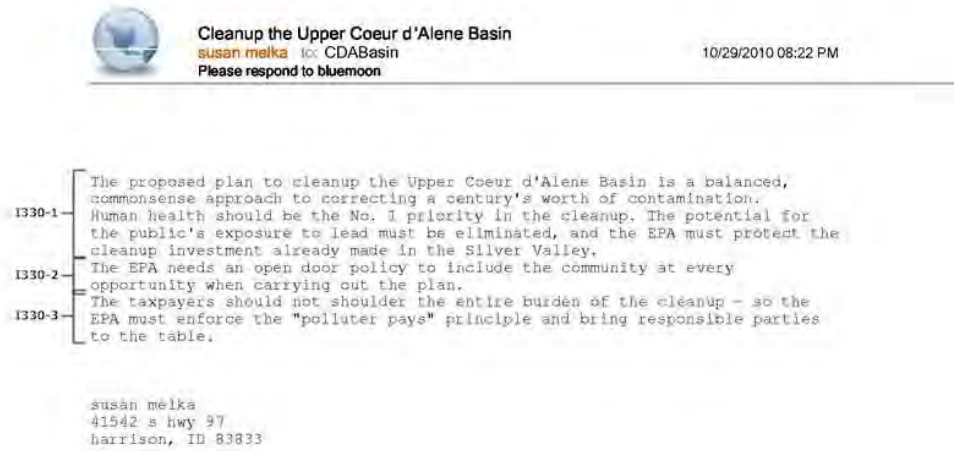
Response to comment I693-1

See response to Comment No. I351-1.

Response to comment I693-2

See response to Comment No. LJ39-5.

Melka, Susan, I330, Letter 614460



Cleanup the Upper Coeur d'Alene Basin
susan melka to: CDABasin 10/29/2010 08:22 PM
Please respond to bluemoon

I330-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I330-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I330-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

susan melka
41542 s hwy 97
harrison, ID 83833

614460

Response to comment I330-1

See response to Comment No. I295-1.

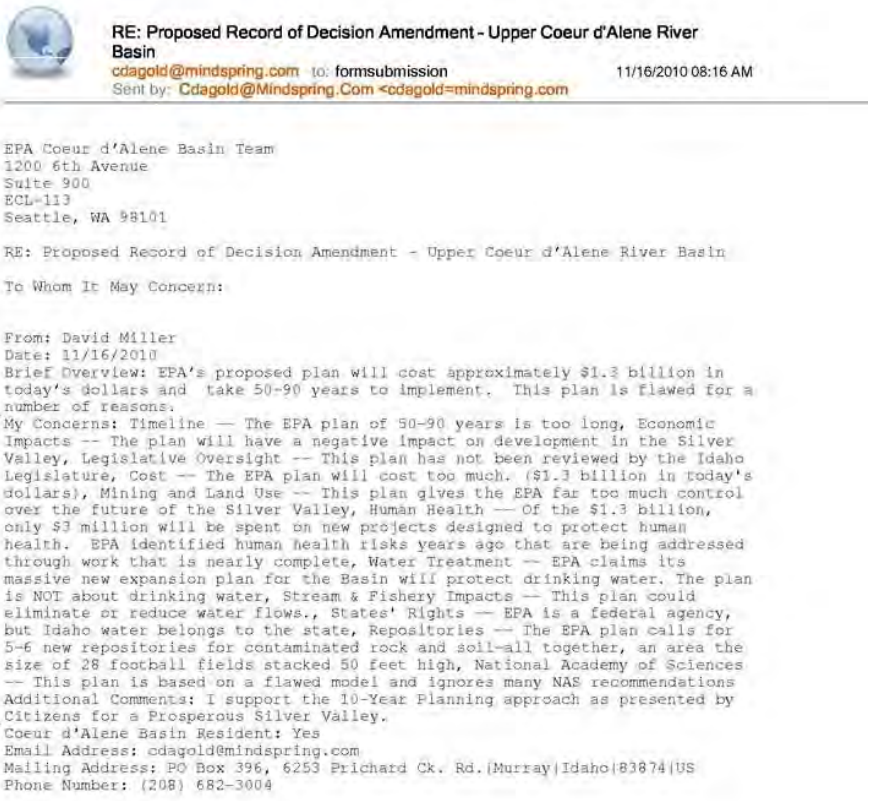
Response to comment I330-2

See response to Comment No. I295-2.

Response to comment I330-3

See response to Comment No. I295-3.

Miller, David, I406, Letter 616304



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
cdagold@mindspring.com to: formsubmission 11/16/2010 08:16 AM
Sent by: Cdagold@Mindspring.Com <cdagold=mindspring.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

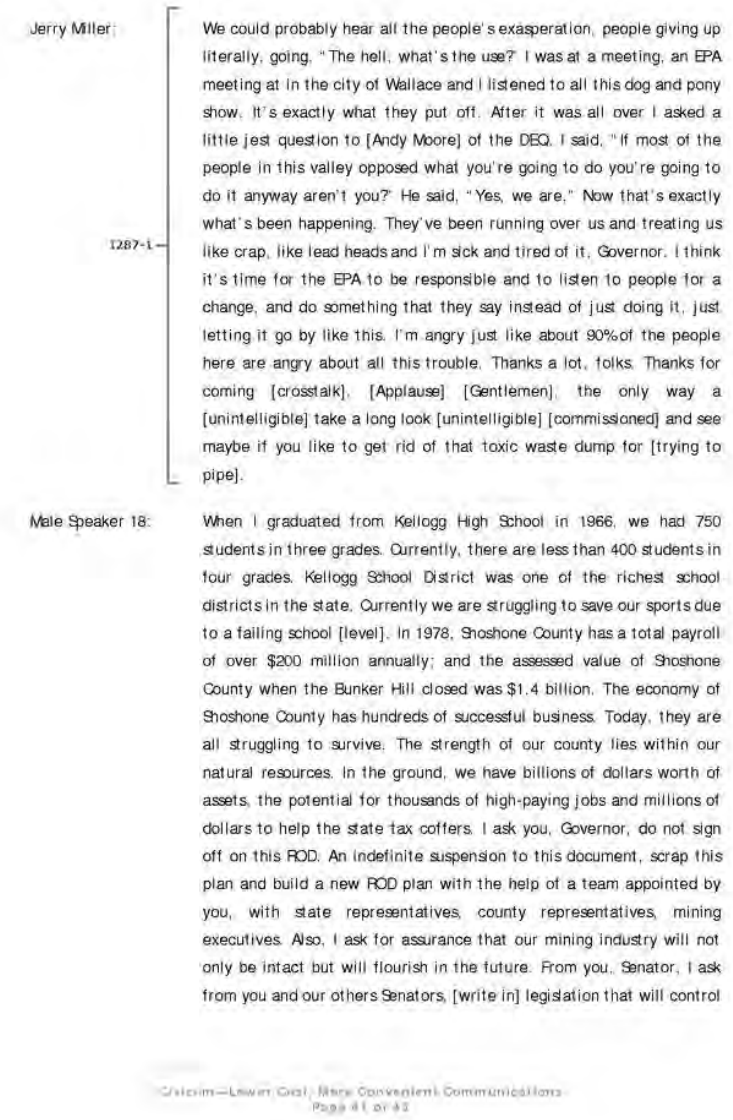
From: David Miller
Date: 11/16/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I406-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: cdagold@mindspring.com
Mailing Address: PO Box 396, 6253 Prichard Ck. Rd.|Murray|Idaho|83874|US
Phone Number: (208) 682-3004

616304

Response to comment I406-1

See response to Comment No. I351-1.

Miller, Jerry, I287, Letter 616015-52



Jerry Miller:

We could probably hear all the people's exasperation, people giving up literally, going, "The hell, what's the use?" I was at a meeting, an EPA meeting at in the city of Wallace and I listened to all this dog and pony show. It's exactly what they put off. After it was all over I asked a little jest question to [Andy Moore] of the DEQ. I said, "If most of the people in this valley opposed what you're going to do you're going to do it anyway aren't you?" He said, "Yes, we are." Now that's exactly what's been happening. They've been running over us and treating us like crap, like lead heads and I'm sick and tired of it, Governor. I think it's time for the EPA to be responsible and to listen to people for a change, and do something that they say instead of just doing it, just letting it go by like this. I'm angry just like about 90%of the people here are angry about all this trouble. Thanks a lot, folks. Thanks for coming [crosstalk]. [Applause] [Gentlemen], the only way a [unintelligible] take a long look [unintelligible] [commissioned] and see maybe if you like to get rid of that toxic waste dump for [trying to pipe].

I287-1

Male Speaker 18:

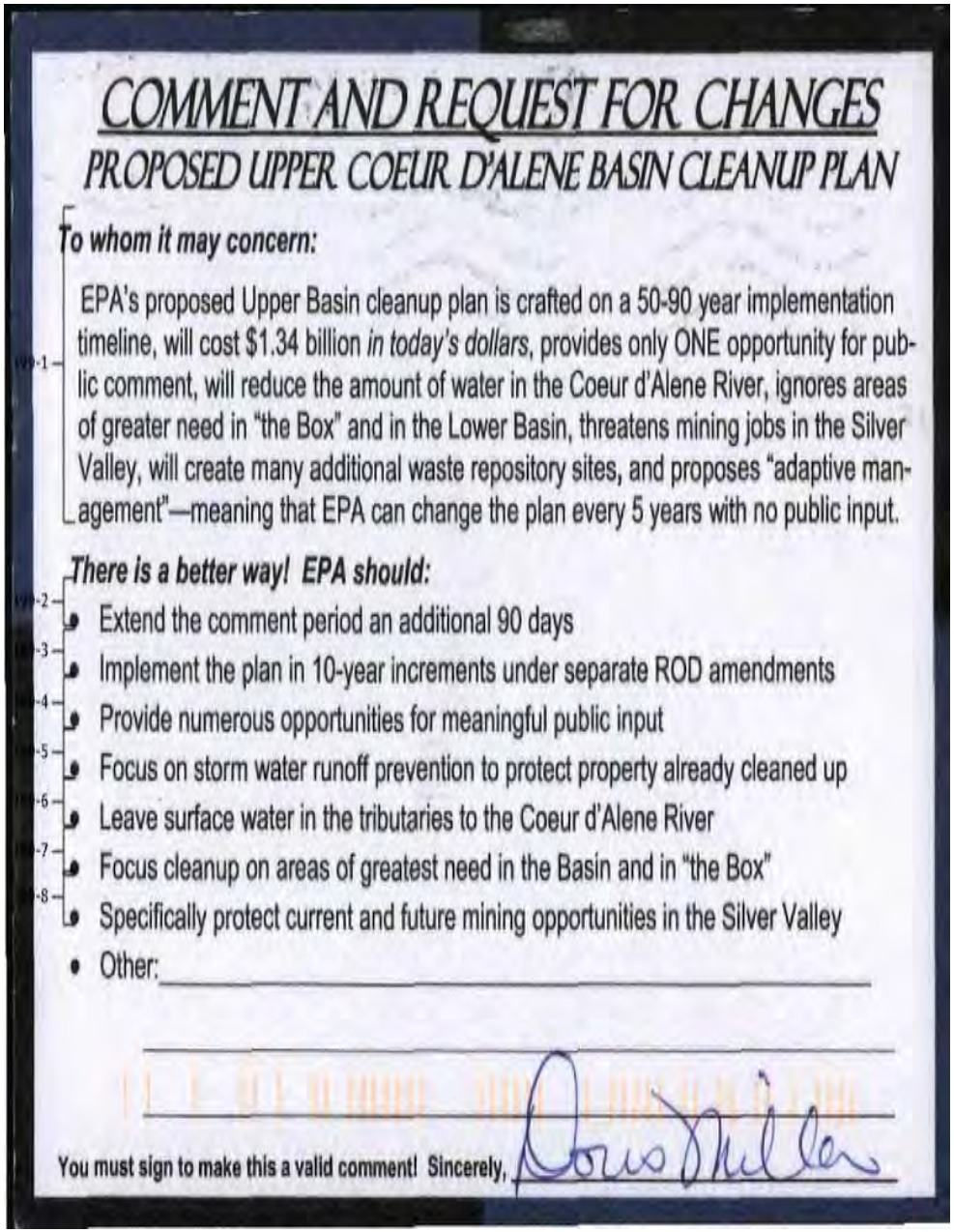
When I graduated from Kellogg High School in 1966, we had 750 students in three grades. Currently, there are less than 400 students in four grades. Kellogg School District was one of the richest school districts in the state. Currently we are struggling to save our sports due to a failing school [level]. In 1978, Shoshone County has a total payroll of over $200 million annually; and the assessed value of Shoshone County when the Bunker Hill closed was $1.4 billion. The economy of Shoshone County has hundreds of successful business. Today, they are all struggling to survive. The strength of our county lies within our natural resources. In the ground, we have billions of dollars worth of assets, the potential for thousands of high-paying jobs and millions of dollars to help the state tax coffers. I ask you, Governor, do not sign off on this ROD. An indefinite suspension to this document, scrap this plan and build a new ROD plan with the help of a team appointed by you, with state representatives, county representatives, mining executives. Also, I ask for assurance that our mining industry will not only be intact but will flourish in the future. From you, Senator, I ask from you and our others Senators, [write in] legislation that will control

Viscom—Lower Cost, More Convenient Communications
Page 41 of 43

Response to comment I287-1

See responses to Comment Nos. I295-2 and I58-1.

Miller, Doris, I99, Letter 1357146



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I99-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I99-2 • Extend the comment period an additional 90 days
I99-3 • Implement the plan in 10-year increments under separate ROD amendments
I99-4 • Provide numerous opportunities for meaningful public input
I99-5 • Focus on storm water runoff prevention to protect property already cleaned up
I99-6 • Leave surface water in the tributaries to the Coeur d'Alene River
I99-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
I99-8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other: _____

You must sign to make this a valid comment! Sincerely, Doris Miller

Response to comment I99-1
See response to Comment No. I25-1.

Response to comment I99-2
See response to Comment No. I25-2.

Response to comment I99-3
See response to Comment No. I25-3.

Response to comment I99-4
See response to Comment No. I25-4.

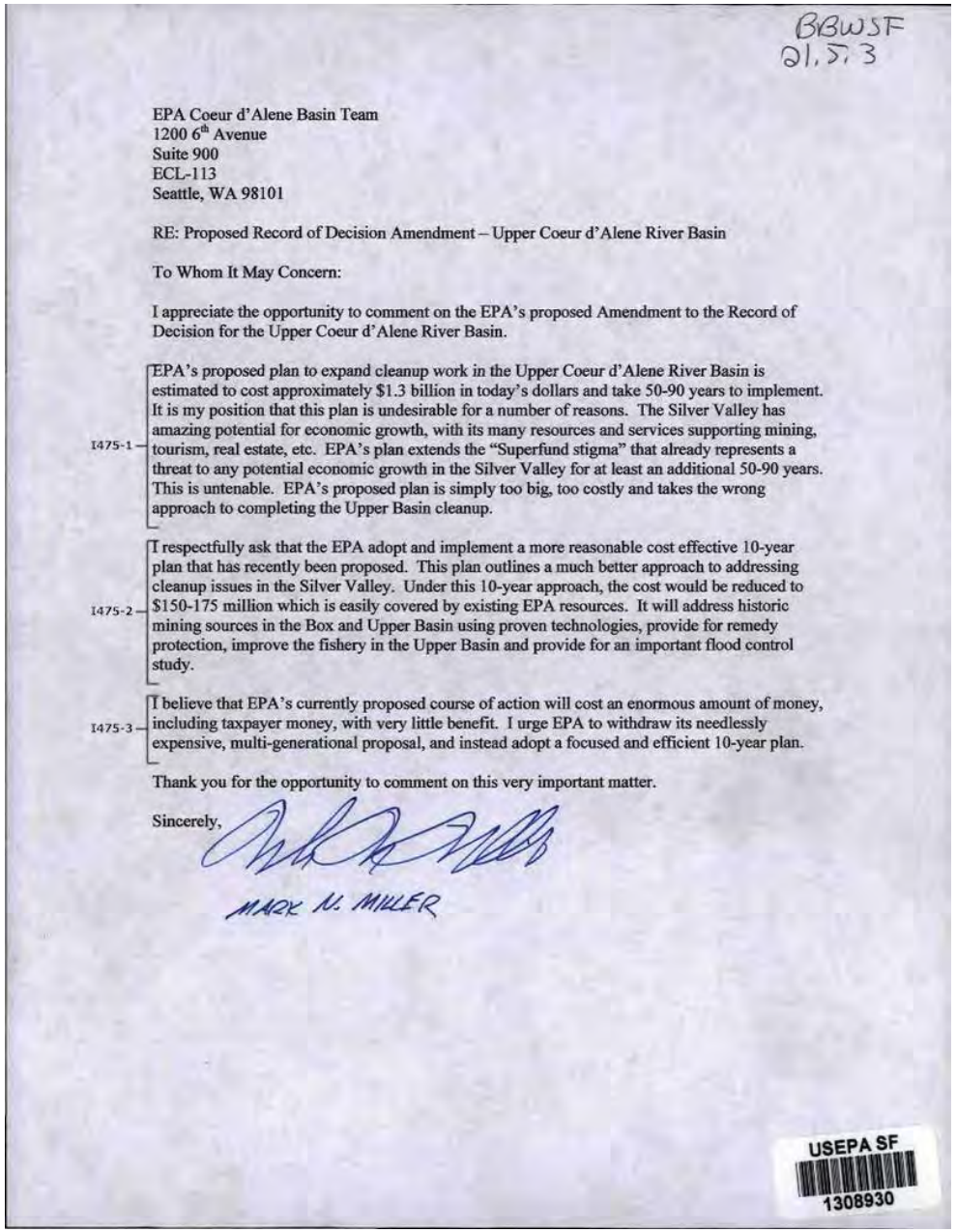
Response to comment I99-5
See response to Comment No. I25-5.

Response to comment I99-6
See response to Comment No. I25-6.

Response to comment I99-7
See response to Comment No. I25-7.

Response to comment I99-8
See response to Comment No. I25-8.

Miller, Mark N., I475, Letter 1308930



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I475-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I475-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I475-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

MARK N. MILLER

USEPA SF
1308930

Response to comment I475-1

See response to Comment No. I474-1.

Response to comment I475-2

See response to Comment No. I474-2.

Response to comment I475-3

See response to Comment No. I474-3.

Miller, Paul, I694, Letter 618304

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
pmiller@agrium.com to: formsubmission 11/19/2010 12:56 PM
Sent by: Pmiller@Agrium.Com <pmiller=agrium.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Paul Miller
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. Doing something.....anything is better than doing nothing. 50 years is unreasonable. The valley would be hurt beyond repair in that lenght of time. Federal red tape is to onerous, and most times detrimental to the project's need of getting something done now!
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: pmiller@agrium.com
Mailing Address: 3010 conda road|Soda Springs|Idaho|83276|US
Phone Number: (208) 547-3935

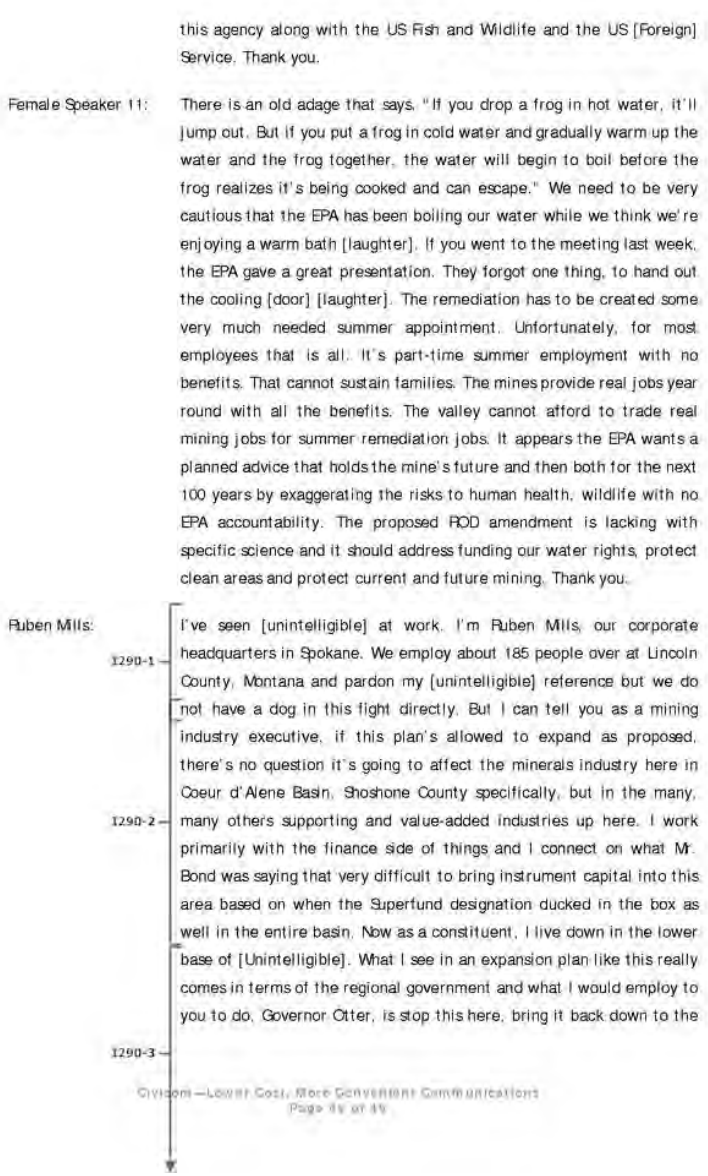
I694-1

618304

Response to comment I694-1

See response to Comment No. I351-1.

Mills, Ruben, I290, Letter 616015-55



this agency along with the US Fish and Wildlife and the US [Foreign] Service. Thank you.

Female Speaker 11: There is an old adage that says, "If you drop a frog in hot water, it'll jump out. But if you put a frog in cold water and gradually warm up the water and the frog together, the water will begin to boil before the frog realizes it's being cooked and can escape." We need to be very cautious that the EPA has been boiling our water while we think we're enjoying a warm bath [laughter]. If you went to the meeting last week, the EPA gave a great presentation. They forgot one thing, to hand out the cooling [door] [laughter]. The remediation has to be created some very much needed summer appointment. Unfortunately, for most employees that is all. It's part-time summer employment with no benefits. That cannot sustain families. The mines provide real jobs year round with all the benefits. The valley cannot afford to trade real mining jobs for summer remediation jobs. It appears the EPA wants a planned advice that holds the mine's future and then both for the next 100 years by exaggerating the risks to human health, wildlife with no EPA accountability. The proposed ROD amendment is lacking with specific science and it should address funding our water rights, protect clean areas and protect current and future mining. Thank you.

Ruben Mills: I've seen [unintelligible] at work. I'm Ruben Mills, our corporate headquarters in Spokane. We employ about 185 people over at Lincoln County, Montana and pardon my [unintelligible] reference but we do not have a dog in this fight directly. But I can tell you as a mining industry executive, if this plan's allowed to expand as proposed, there's no question it's going to affect the minerals industry here in Coeur d'Alene Basin, Shoshone County specifically, but in the many, many others supporting and value-added industries up here. I work primarily with the finance side of things and I connect on what Mr. Bond was saying that very difficult to bring instrument capital into this area based on when the Superfund designation ducked in the box as well in the entire basin. Now as a constituent, I live down in the lower base of [Unintelligible]. What I see in an expansion plan like this really comes in terms of the regional government and what I would employ to you to do, Governor Otter, is stop this here, bring it back down to the

I290-1

I290-2

I290-3

Civicom—Lower Cost, More Convenient Communications
Page 49 of 49

Response to comment I290-1
Thank you for your comment.

Response to comment I290-2
See response to Comment No. I58-5.

Response to comment I290-3
Comment noted.

I290-3

state, tribal and local levels, to help manage this and start working on the problems. Remember that, sir, created the problem. Thank you.

Male Speaker 19: My wife owns her childhood home which has been in the family for 70 years. It currently is the worst eye sore in the municipality [I work in]. My wife and I came very nearly to being criminals courtesy of the EPA and its [unintelligible] travelers the state. We were indicted for digging in our property in an effort to try and make it more presentable. I am now well aware of the junk science that the EPA relies on in propagating its rules and regulations, and the even more fraudulent way in which it conducts its sampling to support its junk science. Government in all levels is under control. Nothing is more out of control than the EPA. Comments to the EPA are an exercise in futility. Do you already know about Cataldo? Comments will be ignored just as they were in the case of Cataldo. The public's only recourse is through legislative process. People die in [leading]. We're spending billions of dollars to save a few birds in Idaho. This insanity needs to be stopped. I'm not expecting any significant help from the incumbent legislators in this country but I hope that the voters will carefully evaluate the activity of their elected representatives. Thank you.

Sen. Mike Crapo: I want to thank everybody for coming tonight. When I first called and asked Administrator McLerran to come here and be with me at this hearing to listen to the people of Idaho and then later when I talked to Mr. Opalski through his stepping in for administrator McLerran because he's ill tonight, I indicated to both of them that I wanted them to come and be with us here in Idaho and to hear the people of Idaho in their message and the depth of the feeling with which they would deliver. I do appreciate the fact that you've been willing to come and I hope that you will take this message back. We can, here in Idaho, with our tribal, our state and local officials, help to crack the kinds of solutions to eh issues we face that will be workable and will help us to truly build the kind of economic strength and protect and preserve the environmental heritage that we have in this incredible valley. I wanted to have the EPA understand that not only does our federal delegation but our state and local and tribal officials understand very well the importance of building that kind of a collaborative solution to move forward. I don't think I can say any better or more strongly but the people who have

No comments

Mishra, Anvita, I15, Letter 896739

Comments on EPA plans for Silver Valley
Anvita Mishra
to:
CDABasin
08/03/2010 03:52 PM
Show Details

Hello,

I15-1 I am Anvita Mishra, an employee of Hecla Mining Company. Please see attached my comments for EPA's plans for the silver valley.

Sincerely,
Anvita

896739

Response to comment I15-1

Thank you for your comments.

Mishra, Anvita, I16, Letter 896740

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I16-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I16-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I16-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I16-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I16-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,
Anvita Mishra

896740

Response to comment I16-1
See response to Comment No. I58-1.

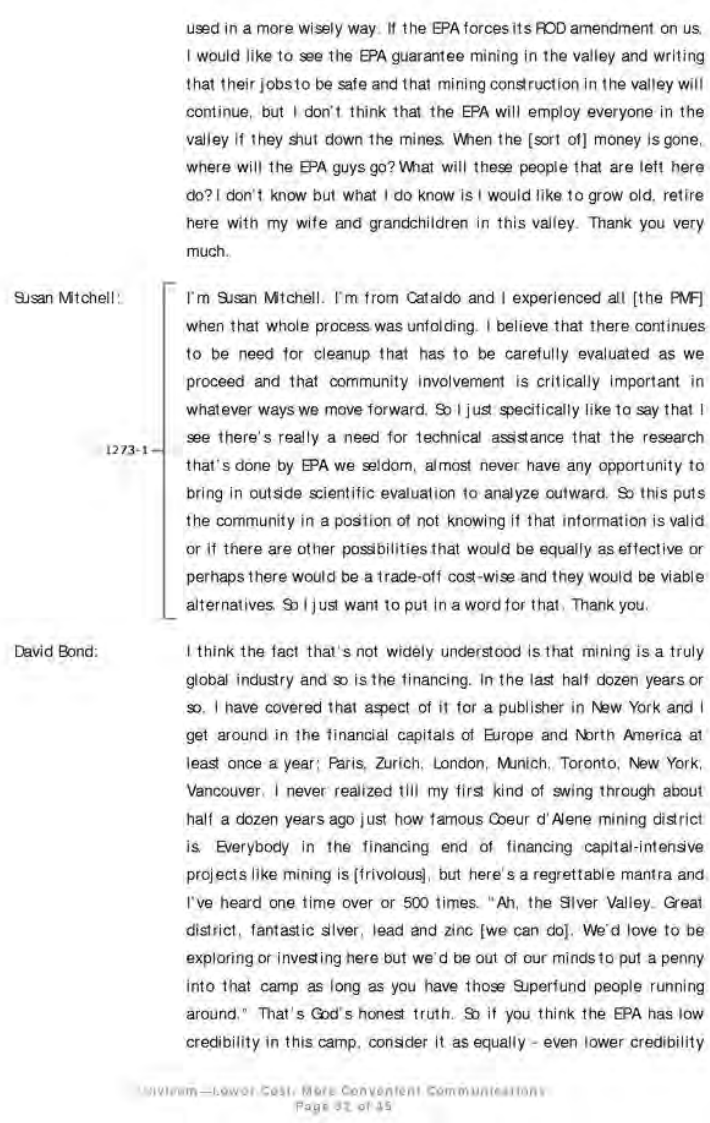
Response to comment I16-2
See response to Comment No. I58-2.

Response to comment I16-3
See response to Comment No. I58-3.

Response to comment I16-4
See response to Comment No. I58-4.

Response to comment I16-5
See response to Comment No. I58-5.

Mitchell, Susan, I273, Letter 616015-37



used in a more wisely way. If the EPA forces its ROD amendment on us. I would like to see the EPA guarantee mining in the valley and writing that their jobs to be safe and that mining construction in the valley will continue, but I don't think that the EPA will employ everyone in the valley if they shut down the mines. When the [sort of] money is gone, where will the EPA guys go? What will these people that are left here do? I don't know but what I do know is I would like to grow old, retire here with my wife and grandchildren in this valley. Thank you very much.

Susan Mitchell: I'm Susan Mitchell. I'm from Cataldo and I experienced all [the PMF] when that whole process was unfolding. I believe that there continues to be need for cleanup that has to be carefully evaluated as we proceed and that community involvement is critically important in whatever ways we move forward. So I just specifically like to say that I see there's really a need for technical assistance that the research that's done by EPA we seldom, almost never have any opportunity to bring in outside scientific evaluation to analyze outward. So this puts the community in a position of not knowing if that information is valid or if there are other possibilities that would be equally as effective or perhaps there would be a trade-off cost-wise and they would be viable alternatives. So I just want to put in a word for that. Thank you.

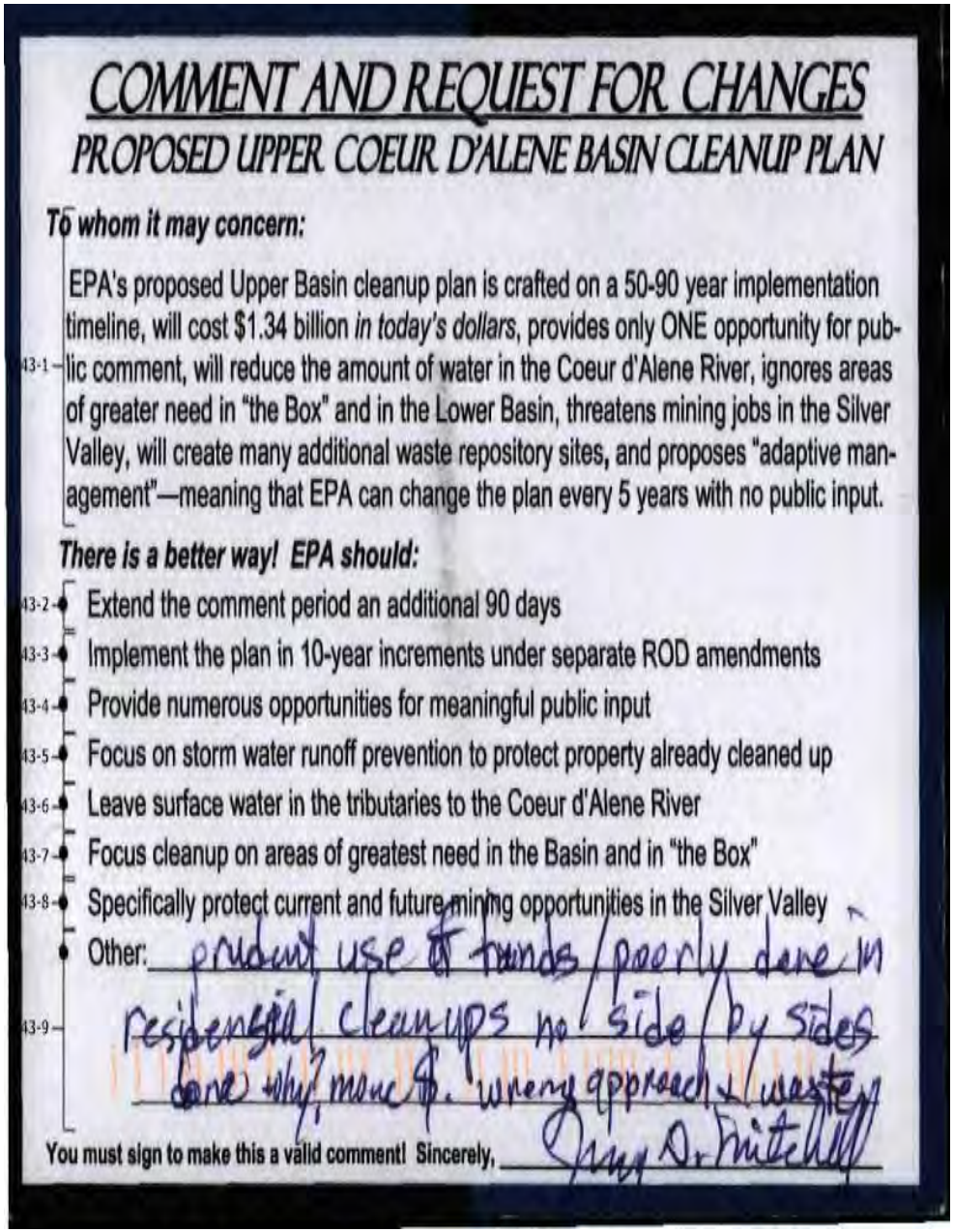
I273-1

David Bond: I think the fact that's not widely understood is that mining is a truly global industry and so is the financing. In the last half dozen years or so, I have covered that aspect of it for a publisher in New York and I get around in the financial capitals of Europe and North America at least once a year; Paris, Zurich, London, Munich, Toronto, New York, Vancouver. I never realized till my first kind of swing through about half a dozen years ago just how famous Coeur d'Alene mining district is. Everybody in the financing end of financing capital-intensive projects like mining is [frivolous], but here's a regrettable mantra and I've heard one time over or 500 times. "Ah, the Silver Valley. Great district, fantastic silver, lead and zinc [we can do]. We'd love to be exploring or investing here but we'd be out of our minds to put a penny into that camp as long as you have those Superfund people running around." That's God's honest truth. So if you think the EPA has low credibility in this camp, consider it as equally - even lower credibility

Response to comment I273-1

In response to requests for technical assistance, EPA is bringing its "Technical Assistance Services for Communities" (TASC) program to the site. TASC provides independent experts who can give free educational and technical assistance to communities affected by hazardous waste sites. A technical assistance needs assessment is under way to learn about local assistance needs.

Mitchell, J., I143, Letter 1357279



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I143-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I143-2 Extend the comment period an additional 90 days
- I143-3 Implement the plan in 10-year increments under separate ROD amendments
- I143-4 Provide numerous opportunities for meaningful public input
- I143-5 Focus on storm water runoff prevention to protect property already cleaned up
- I143-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I143-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I143-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: prudent use of funds / poorly done in residential cleanups no side by sides done why? more $. wrong approach + waste

I143-9

You must sign to make this a valid comment! Sincerely, Jerry D. Mitchell

Response to comment I143-1
See response to Comment No. I25-1.

Response to comment I143-2
See response to Comment No. I25-2.

Response to comment I143-3
See response to Comment No. I25-3.

Response to comment I143-4
See response to Comment No. I25-4.

Response to comment I143-5
See response to Comment No. I25-5.

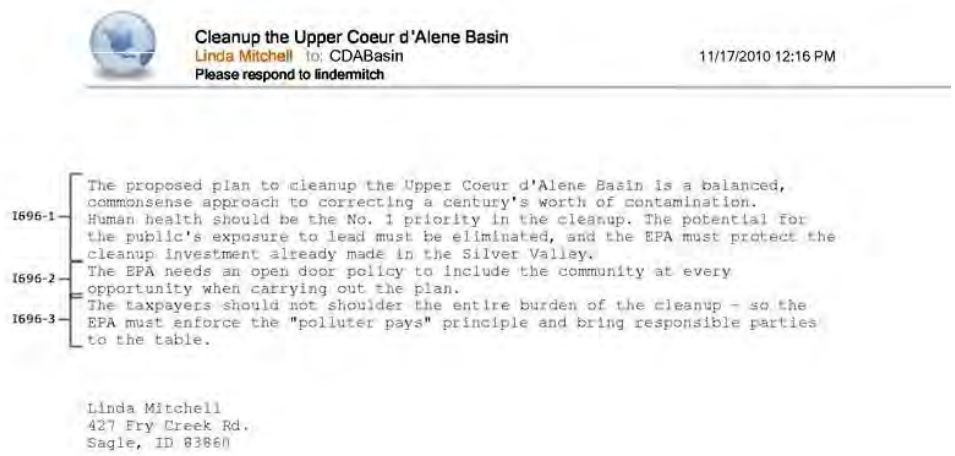
Response to comment I143-6
See response to Comment No. I25-6.

Response to comment I143-7
See response to Comment No. I25-7.

Response to comment I143-8
See response to Comment No. I25-8.

Response to comment I143-9
See response to Comment No. I58-2 regarding cost of the Selected Remedy and I521-8 regarding the yards cleanup work.

Mitchell, Linda, I696, Letter 618306



Cleanup the Upper Coeur d'Alene Basin
Linda Mitchell to: CDABasin 11/17/2010 12:16 PM
Please respond to lindemitch

I696-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I696-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I696-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Linda Mitchell
427 Fry Creek Rd.
Sagle, ID 83860

618306

Response to comment I696-1

See response to Comment No. I295-1.

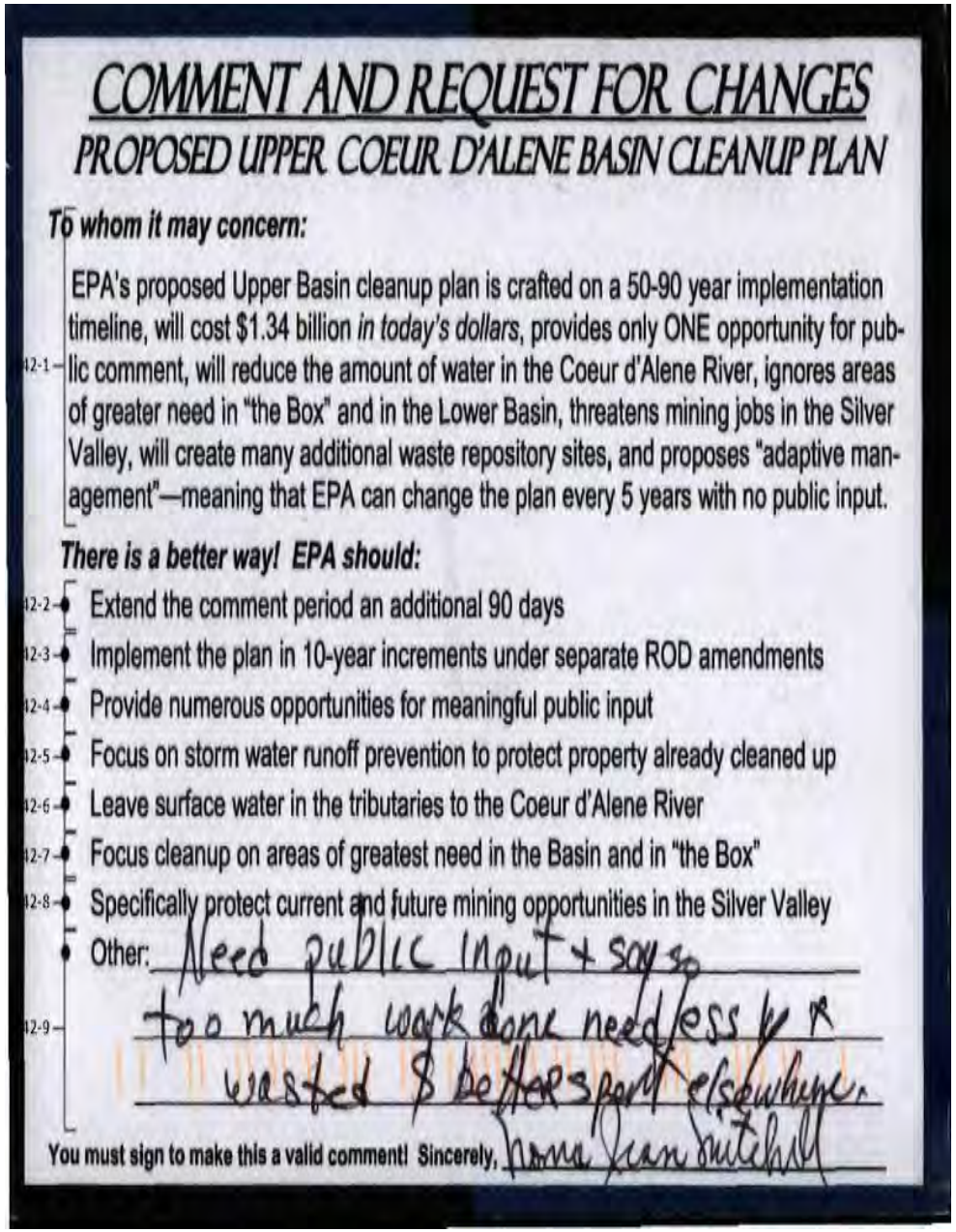
Response to comment I696-2

See response to Comment No. I295-2.

Response to comment I696-3

See response to Comment No. I295-3.

Mitchell, Noma Jean, I142, Letter 1357278



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I142-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I142-2 Extend the comment period an additional 90 days

I142-3 Implement the plan in 10-year increments under separate ROD amendments

I142-4 Provide numerous opportunities for meaningful public input

I142-5 Focus on storm water runoff prevention to protect property already cleaned up

I142-6 Leave surface water in the tributaries to the Coeur d'Alene River

I142-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"

I142-8 Specifically protect current and future mining opportunities in the Silver Valley

Other: Need public input + say so too much work done needless $ & resources wasted & better spent elsewhere.

I142-9

You must sign to make this a valid comment! Sincerely, Noma Jean Mitchell

Response to comment I142-1
See response to Comment No. I25-1.

Response to comment I142-2
See response to Comment No. I25-2.

Response to comment I142-3
See response to Comment No. I25-3.

Response to comment I142-4
See response to Comment No. I25-4.

Response to comment I142-5
See response to Comment No. I25-5.

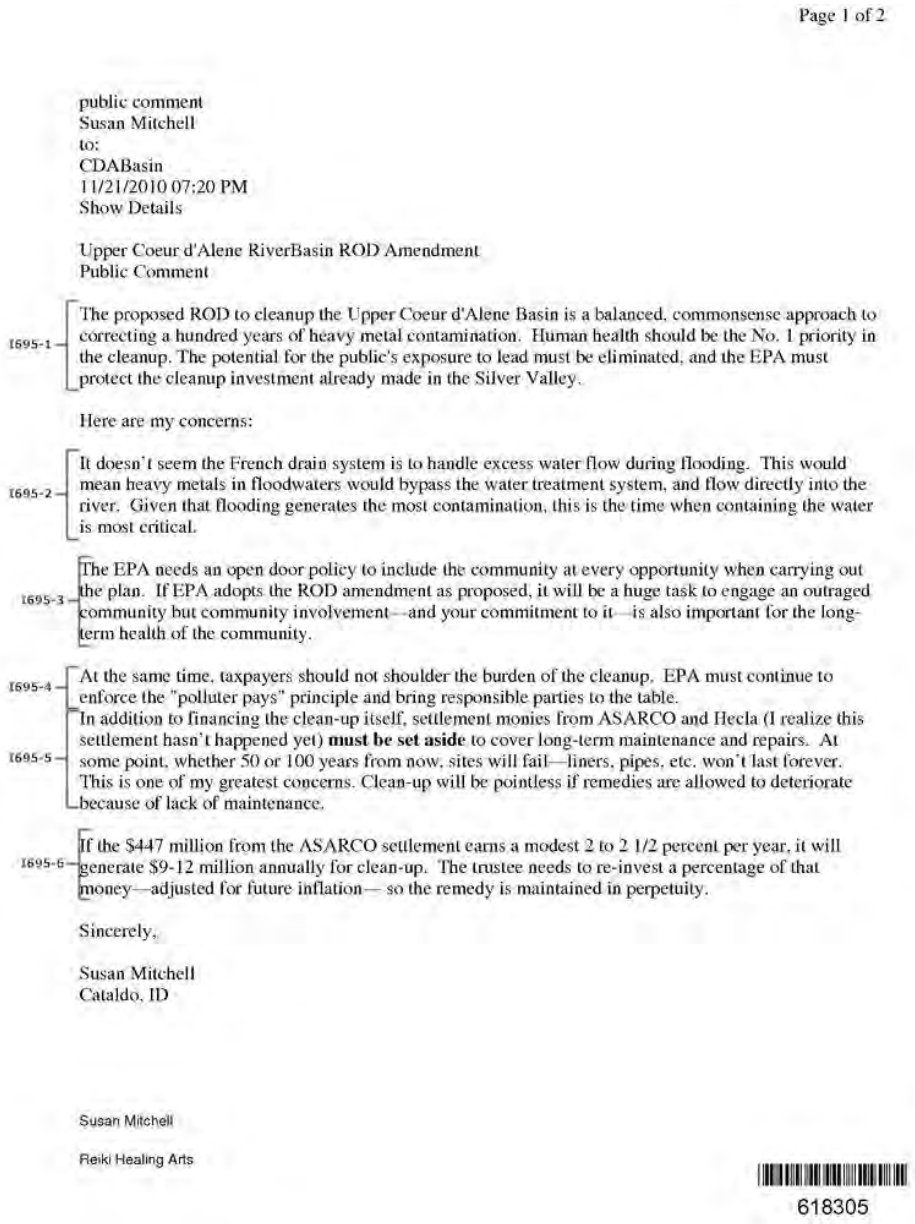
Response to comment I142-6
See response to Comment No. I25-6.

Response to comment I142-7
See response to Comment No. I25-7.

Response to comment I142-8
See response to Comment No. I25-8.

Response to comment I142-9
See responses to Comment Nos. I295-1, I295-2, and I58-1.

Mitchell, Susan, I695, Letter 618305



Page 1 of 2

public comment
Susan Mitchell
to:
CDABasin
11/21/2010 07:20 PM
Show Details

Upper Coeur d'Alene RiverBasin ROD Amendment
Public Comment

I695-1 The proposed ROD to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a hundred years of heavy metal contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

Here are my concerns:

I695-2 It doesn't seem the French drain system is to handle excess water flow during flooding. This would mean heavy metals in floodwaters would bypass the water treatment system, and flow directly into the river. Given that flooding generates the most contamination, this is the time when containing the water is most critical.

I695-3 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan. If EPA adopts the ROD amendment as proposed, it will be a huge task to engage an outraged community but community involvement—and your commitment to it—is also important for the long-term health of the community.

I695-4 At the same time, taxpayers should not shoulder the burden of the cleanup. EPA must continue to enforce the "polluter pays" principle and bring responsible parties to the table.

I695-5 In addition to financing the clean-up itself, settlement monies from ASARCO and Hecla (I realize this settlement hasn't happened yet) **must be set aside** to cover long-term maintenance and repairs. At some point, whether 50 or 100 years from now, sites will fail—liners, pipes, etc. won't last forever. This is one of my greatest concerns. Clean-up will be pointless if remedies are allowed to deteriorate because of lack of maintenance.

I695-6 If the $447 million from the ASARCO settlement earns a modest 2 to 2 1/2 percent per year, it will generate $9-12 million annually for clean-up. The trustee needs to re-invest a percentage of that money—adjusted for future inflation— so the remedy is maintained in perpetuity.

Sincerely,

Susan Mitchell
Cataldo, ID

Susan Mitchell

Reiki Healing Arts

618305

Response to comment I695-1

Thank you for your comment. See response to Comment No. I295-1.

Response to comment I695-2

The French drains will collect groundwater. The flow of groundwater does fluctuate seasonally but not nearly to the extent that surface water flows do. It is anticipated that the drains can be designed to collect nearly the same flow of groundwater throughout the year. The Selected Remedy is an interim remedy and therefore is not designed to collect all contaminated groundwater that could enter the SFCDR and its tributaries. Groundwater will be collected in three locations: Woodland Park, Osburn, and the Bunker Hill Box. During flood conditions, particulate lead contamination in surface water typically increases as rain and snow melt come in contact with mining-related wastes prior to entering the SFCDR and its tributaries. The Selected Remedy will reduce particulate lead loading during flooding conditions through source control actions such as onsite capping and excavation and disposal in local waste consolidation areas and regional repositories. However, particulate lead is generally not present in groundwater and therefore not a primary issue for the design of groundwater collection and treatment systems.

Response to comment I695-3

See responses to Comment Nos. I295-2 and LJ11-2.

Response to comment I695-4

See response to Comment No. I295-3.

Response to comment I695-5

EPA agrees that maintenance is an important consideration, and as described in Part 2, Section 12.1.3 of the ROD Amendment, included this in the costing of the Selected Remedy. Regarding the cost and funding of the Selected Remedy, including recovery of settlement monies, see ROD Amendment, Part 3, Section 3.9 and responses to Comment Nos. I58-1 and I58-2.

Response to comment I695-6

See response to Comment No. I295-3.

No comments

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susan@reikihealingarts.com

208-512-1524

Reiki Healing Arts

35695 E Canyon Rd

Cataldo, ID 83810

Molina-Smith, Maria, I424, Letter 616328

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
memolina.smith@gmail.com to: formsubmission 11/15/2010 08:15 PM
Sent by: Memolina.Smith@Gmail.Com <memolina.smith=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Maria Molina-Smith
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: memolina.smith@gmail.com
Mailing Address: 3753 N. Margaux St.|Coeur d' Alene|ID|83815|US
Phone Number: (208) 665-7285

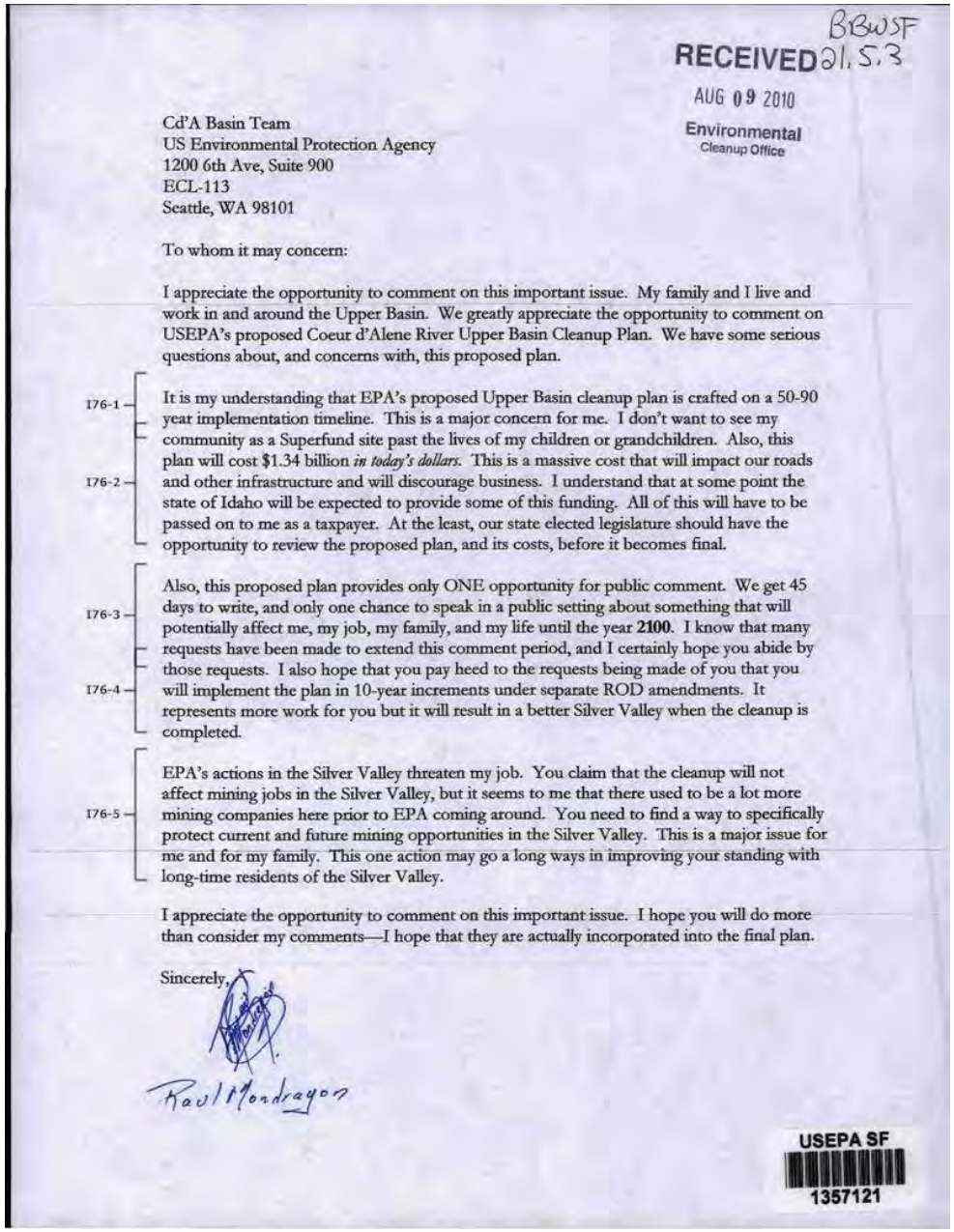
I424-1

616328

Response to comment I424-1

See response to Comment No. I351-1.

Mondragon, Raul, I76, Letter 1357121



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AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I76-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I76-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I76-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I76-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I76-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Raul Mondragon

USEPA SF
1357121

Response to comment I76-1
See response to Comment No. I58-1.

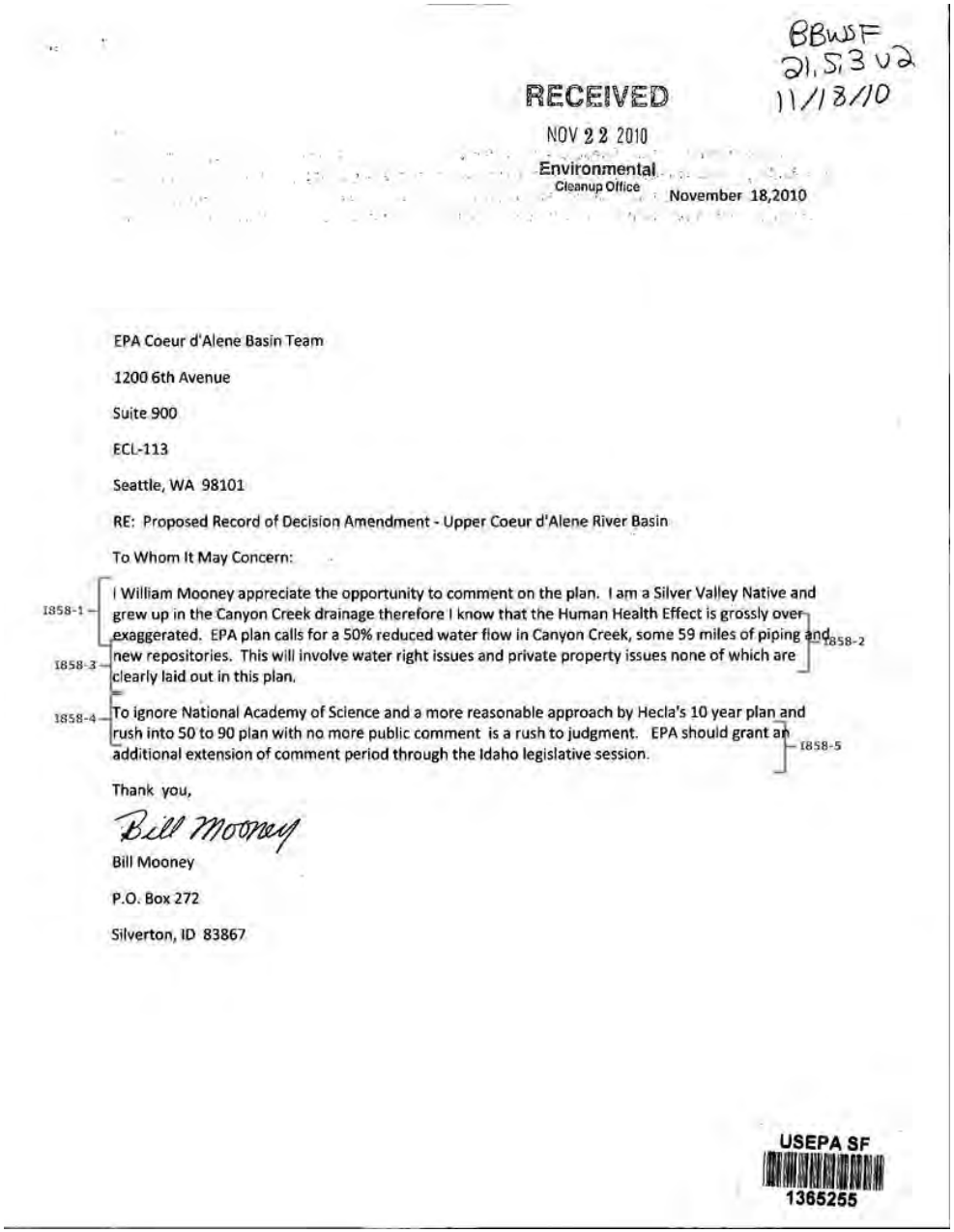
Response to comment I76-2
See response to Comment No. I58-2.

Response to comment I76-3
See response to Comment No. I58-3.

Response to comment I76-4
See response to Comment No. I58-4.

Response to comment I76-5
See response to Comment No. I58-5.

Mooney, Bill, I858, Letter 1365255



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21.53 v2
11/18/10

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November 18,2010

EPA Coeur d'Alene Basin Team

1200 6th Avenue

Suite 900

ECL-113

Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

I858-1 I William Mooney appreciate the opportunity to comment on the plan. I am a Silver Valley Native and grew up in the Canyon Creek drainage therefore I know that the Human Health Effect is grossly over exaggerated. EPA plan calls for a 50% reduced water flow in Canyon Creek, some 59 miles of piping and I858-2
I858-3 new repositories. This will involve water right issues and private property issues none of which are clearly laid out in this plan.

I858-4 To ignore National Academy of Science and a more reasonable approach by Hecla's 10 year plan and rush into 50 to 90 plan with no more public comment is a rush to judgment. EPA should grant an additional extension of comment period through the Idaho legislative session. I858-5

Thank you,

Bill Mooney

Bill Mooney

P.O. Box 272

Silverton, ID 83867

USEPA SF
1365255

Response to comment I858-1

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

Response to comment I858-2

See responses to Comment Nos. I295-1, I54-8, and I54-3.

Response to comment I858-3

See responses to Comment Nos. SA4-12 and I248-1 and the ROD Amendment, Part 3, Section 3.7.4.

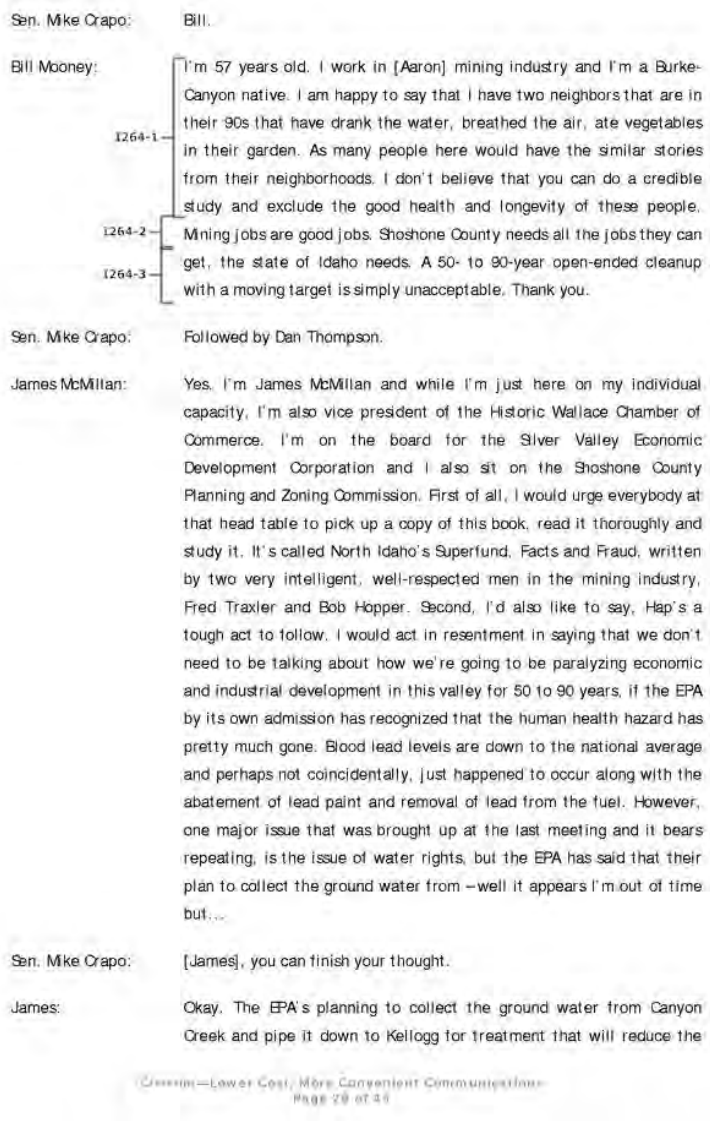
Response to comment I858-4

See responses to Comment Nos. LJ27-8, I474-2, I58-1,and I54-6.

Response to comment I858-5

See responses to Comment Nos. I54-6 and LJ39-5.

Mooney, Bill, I264, Letter 616015-27



Sen. Mike Crapo: Bill.

Bill Mooney: I'm 57 years old. I work in [Aaron] mining industry and I'm a Burke-Canyon native. I am happy to say that I have two neighbors that are in their 90s that have drank the water, breathed the air, ate vegetables in their garden. As many people here would have the similar stories from their neighborhoods. I don't believe that you can do a credible study and exclude the good health and longevity of these people. Mining jobs are good jobs. Shoshone County needs all the jobs they can get, the state of Idaho needs. A 50- to 90-year open-ended cleanup with a moving target is simply unacceptable. Thank you.

I264-1
I264-2
I264-3

Sen. Mike Crapo: Followed by Dan Thompson.

James McMillan: Yes. I'm James McMillan and while I'm just here on my individual capacity, I'm also vice president of the Historic Wallace Chamber of Commerce. I'm on the board for the Silver Valley Economic Development Corporation and I also sit on the Shoshone County Planning and Zoning Commission. First of all, I would urge everybody at that head table to pick up a copy of this book, read it thoroughly and study it. It's called North Idaho's Superfund, Facts and Fraud, written by two very intelligent, well-respected men in the mining industry, Fred Traxler and Bob Hopper. Second, I'd also like to say, Hap's a tough act to follow. I would act in resentment in saying that we don't need to be talking about how we're going to be paralyzing economic and industrial development in this valley for 50 to 90 years, if the EPA by its own admission has recognized that the human health hazard has pretty much gone. Blood lead levels are down to the national average and perhaps not coincidentally, just happened to occur along with the abatement of lead paint and removal of lead from the fuel. However, one major issue that was brought up at the last meeting and it bears repeating, is the issue of water rights, but the EPA has said that their plan to collect the ground water from – well it appears I'm out of time but...

Sen. Mike Crapo: [James], you can finish your thought.

James: Okay. The EPA's planning to collect the ground water from Canyon Creek and pipe it down to Kellogg for treatment that will reduce the

Coeurtm—Lower Cost, More Convenient Communications
Page 29 of 44

Response to comment I264-1

See response to Comment No. I295-1.

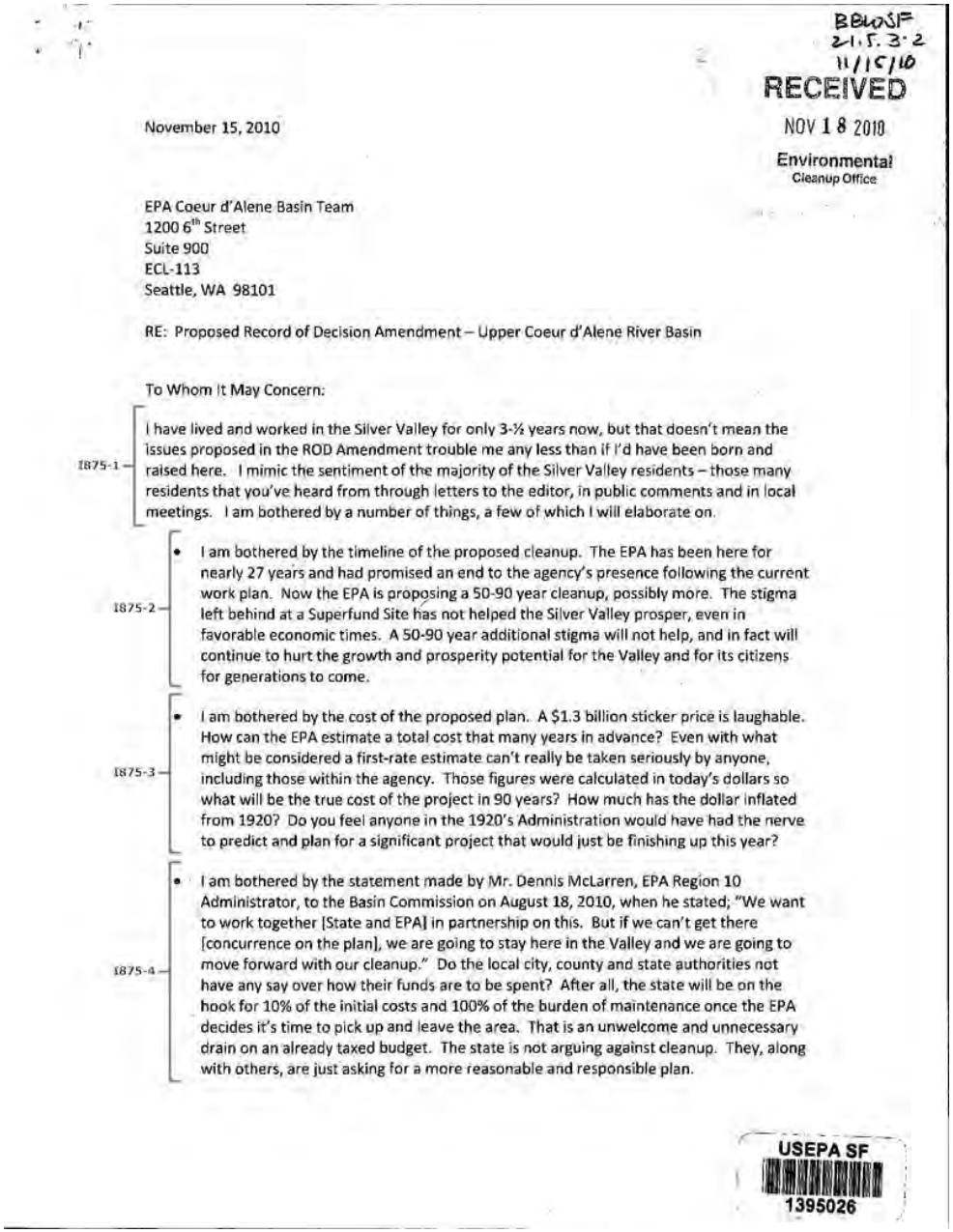
Response to comment I264-2

See response to Comment No. I58-5.

Response to comment I264-3

See response to Comment No. I58-1.

Moore, Cindy, I875, Letter 1395026



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November 15, 2010

EPA Coeur d'Alene Basin Team
1200 6th Street
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I875-1 I have lived and worked in the Silver Valley for only 3-½ years now, but that doesn't mean the issues proposed in the ROD Amendment trouble me any less than if I'd have been born and raised here. I mimic the sentiment of the majority of the Silver Valley residents – those many residents that you've heard from through letters to the editor, in public comments and in local meetings. I am bothered by a number of things, a few of which I will elaborate on.

- I875-2 I am bothered by the timeline of the proposed cleanup. The EPA has been here for nearly 27 years and had promised an end to the agency's presence following the current work plan. Now the EPA is proposing a 50-90 year cleanup, possibly more. The stigma left behind at a Superfund Site has not helped the Silver Valley prosper, even in favorable economic times. A 50-90 year additional stigma will not help, and in fact will continue to hurt the growth and prosperity potential for the Valley and for its citizens for generations to come.
- I875-3 I am bothered by the cost of the proposed plan. A $1.3 billion sticker price is laughable. How can the EPA estimate a total cost that many years in advance? Even with what might be considered a first-rate estimate can't really be taken seriously by anyone, including those within the agency. Those figures were calculated in today's dollars so what will be the true cost of the project in 90 years? How much has the dollar inflated from 1920? Do you feel anyone in the 1920's Administration would have had the nerve to predict and plan for a significant project that would just be finishing up this year?
- I875-4 I am bothered by the statement made by Mr. Dennis McLarren, EPA Region 10 Administrator, to the Basin Commission on August 18, 2010, when he stated; "We want to work together [State and EPA] in partnership on this. But if we can't get there [concurrence on the plan], we are going to stay here in the Valley and we are going to move forward with our cleanup." Do the local city, county and state authorities not have any say over how their funds are to be spent? After all, the state will be on the hook for 10% of the initial costs and 100% of the burden of maintenance once the EPA decides it's time to pick up and leave the area. That is an unwelcome and unnecessary drain on an already taxed budget. The state is not arguing against cleanup. They, along with others, are just asking for a more reasonable and responsible plan.

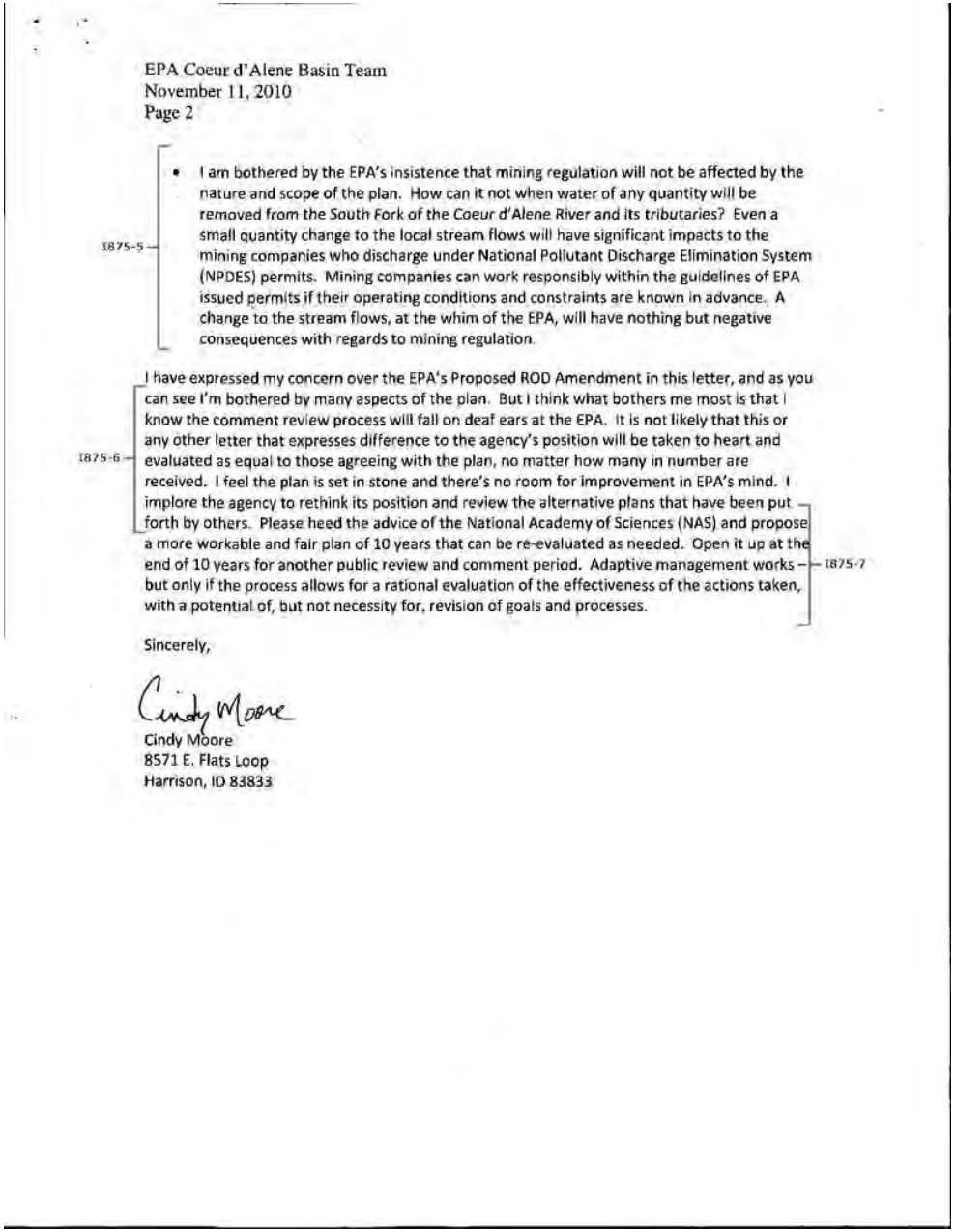
USEPA SF
1395026

Response to comment I875-1
Thank you for your comment.

Response to comment I875-2
See responses to Comment Nos. I474-1 and I58-1.

Response to comment I875-3
See responses to Comment Nos. I58-2 and I54-12.

Response to comment I875-4
Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. The Proposed Plan provides an overall vision of the required cleanup in the Upper Basin. Understanding the big picture will allow EPA to ensure that settlement monies are spent most wisely and maximize the cleanup completed using these funds. Also, see response to Comment No. I58-1. Anticipating high public interest, EPA set the initial public comment period for the Upper Basin Proposed Plan at 45 days. In response to requests for an extension, EPA extended the comment period an additional 90 days, for a total of 135 days. During that time, some members of the Idaho State Legislature reviewed and submitted formal comments on the Proposed Plan. EPA has responded to those comments. Regarding funding of the Selected Remedy, see response to Comment No. I295-3.



EPA Coeur d'Alene Basin Team
November 11, 2010
Page 2

I875-5 —

- I am bothered by the EPA's insistence that mining regulation will not be affected by the nature and scope of the plan. How can it not when water of any quantity will be removed from the South Fork of the Coeur d'Alene River and its tributaries? Even a small quantity change to the local stream flows will have significant impacts to the mining companies who discharge under National Pollutant Discharge Elimination System (NPDES) permits. Mining companies can work responsibly within the guidelines of EPA issued permits if their operating conditions and constraints are known in advance. A change to the stream flows, at the whim of the EPA, will have nothing but negative consequences with regards to mining regulation.

I875-6 — I have expressed my concern over the EPA's Proposed ROD Amendment in this letter, and as you can see I'm bothered by many aspects of the plan. But I think what bothers me most is that I know the comment review process will fall on deaf ears at the EPA. It is not likely that this or any other letter that expresses difference to the agency's position will be taken to heart and evaluated as equal to those agreeing with the plan, no matter how many in number are received. I feel the plan is set in stone and there's no room for improvement in EPA's mind. I implore the agency to rethink its position and review the alternative plans that have been put forth by others. Please heed the advice of the National Academy of Sciences (NAS) and propose a more workable and fair plan of 10 years that can be re-evaluated as needed. Open it up at the end of 10 years for another public review and comment period. Adaptive management works — I875-7 but only if the process allows for a rational evaluation of the effectiveness of the actions taken, with a potential of, but not necessity for, revision of goals and processes.

Sincerely,

Cindy Moore

Cindy Moore
8571 E. Flats Loop
Harrison, ID 83833

Response to comment I875-5

See response to comment I54-8 regarding the estimated quantity of contaminated water to be removed from the SFCDR system under the Selected Remedy. As discussed in the referenced comment, the expected impact of the Selected Remedy on stream flows in the Upper Basin is minimal, even under extreme low-flow conditions. On this basis, it is not anticipated that the flow-based discharge limits included for some parameters in NPDES permits for the SFCDR watershed would be significantly impacted. Further, only the reach of the SFCDR between Wallace and Elizabeth Park is expected to see some minor reduction in stream flows. Within this reach, there are currently only two industrial (mining) wastewater dischargers.

Response to comment I875-6

See response to Comment No. I295-2.

Response to comment I875-7

See responses to Comment Nos. LJ11-2, LJ27-8 and I58-1. Within the context of the Selected Remedy, adaptive management simply means that EPA will implement specific cleanup actions included in the remedy, monitor the effectiveness of those actions to determine whether cleanup levels are being achieved, and make adjustments to future cleanup actions to benefit from the information gained through the effectiveness monitoring. These adjustments may include changes in design, changes in priority of certain actions, or potentially more significant or fundamental changes.

Moore, Clare A., I846, Letter 1365243

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NOV 22 2010 11/18/10
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Cleanup Office

November 18, 2010

EPA Coeur d'Alene Basin Team
1200 6th Street
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

My parents moved to the Silver Valley in 1962 when I was 8 years old. I was raised in the Valley going through grade school at Sunnyside School, and junior high and high school in Kellogg. I finished as Valedictorian of my class graduating in 1973 and continued my education at the University of Idaho at Moscow where I received a B. S. in Chemical Engineering.

During my senior year in high school I worked the afternoon shift for the Bunker Hill Company, spending my day in classes, followed by an eight hour shift at work. This included both the lead smelter and electrolytic zinc plant. I went to college and worked nearly every weekend, available holidays and summers for the company putting myself through school.

My senior year in college the Bunker Hill Company put me on as a full time employee while I finished my final year. They paid for my first child's birth even though I was not fully employed at the time. I started work with them the Monday after my college commencement exercises. I need not go into the demise of the Bunker Hill Company or what has followed since in the past 30 years, we all know that story. What we don't know is the story the EPA is trying to write now and why.

I846-1

I've watched your efforts in the Valley as I worked in Wyoming and Nevada during my professional career. I tried to participate in Region X's lead study for those that grew up in the Valley during the 70's but was rejected because I "didn't fit the profile." I've seen the damage your well meaning programs do for those trying to make a living here, to run a business here. And yet it's not enough.

I don't believe you have the ability to objectively evaluate scientific data or fact any longer; that your agency has now gotten well over critical mass and now is becoming a self prophetic entity whose existence can only come at the expense of those you consume. Your objectives will not benefit those that live here, the environment, nor the fauna and flora that thrive here. To say that your proposed 90 year program will be beneficial is only true in your minds eye as you have no scientific basis to say that your programs will achieve anything.

My wife and I moved back to North Idaho in 2007 as a final stopping point for the rest of our lives. My parents live in Smelterville, both in their 80's, my brother lives in the Valley as well. We have never had health issues, even though while growing up playing, hunting and fishing, and enjoying the Valley. Your proposed programs will destroy everything that we, and many

I846-2

USEPA SF
1365243

Response to comment I846-1

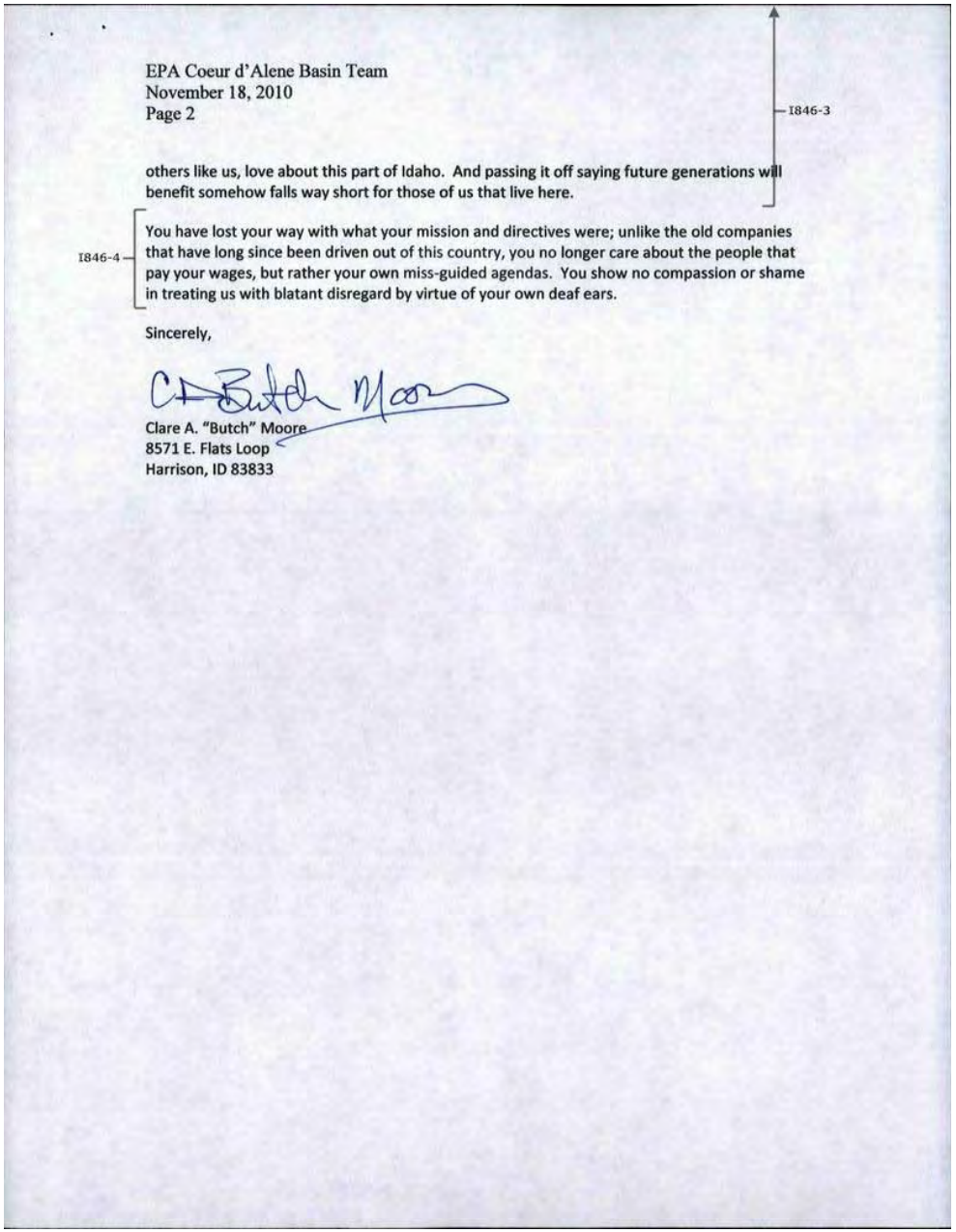
Thank you for your comments.

Response to comment I846-2

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. Contaminants include lead, zinc, cadmium, arsenic, and other metals. The Upper Basin cleanup is essential to addressing these unacceptable risks.

Response to comment I846-3

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.



EPA Coeur d'Alene Basin Team
November 18, 2010
Page 2

I846-3

others like us, love about this part of Idaho. And passing it off saying future generations will benefit somehow falls way short for those of us that live here.

I846-4

You have lost your way with what your mission and directives were; unlike the old companies that have long since been driven out of this country, you no longer care about the people that pay your wages, but rather your own miss-guided agendas. You show no compassion or shame in treating us with blatant disregard by virtue of your own deaf ears.

Sincerely,

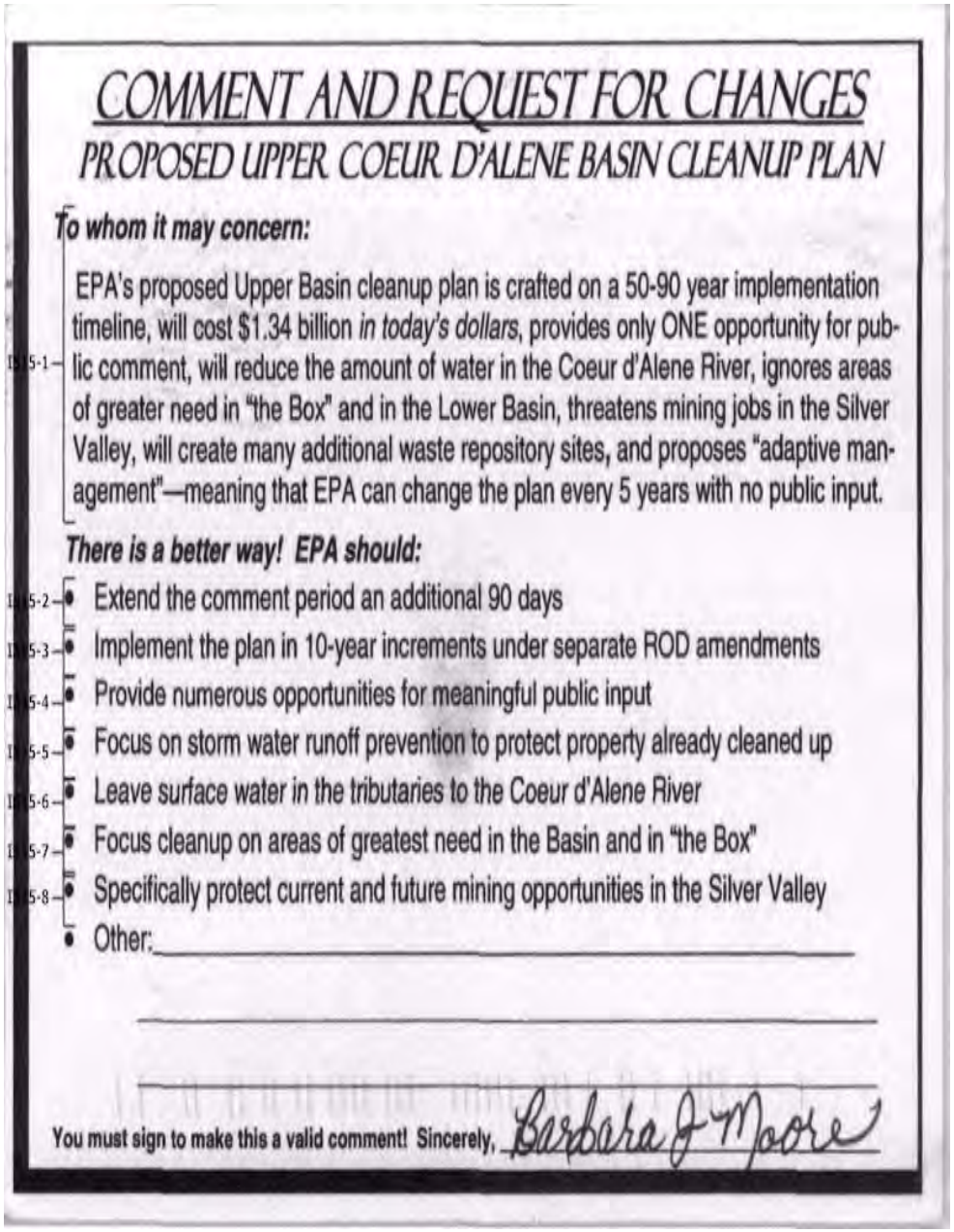
C. Butch Moore

Clare A. "Butch" Moore
8571 E. Flats Loop
Harrison, ID 83833

Response to comment I846-4

Comment noted.

Moore, Barbara, I515, Letter 1357637



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I515-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I515-2 Extend the comment period an additional 90 days
- I515-3 Implement the plan in 10-year increments under separate ROD amendments
- I515-4 Provide numerous opportunities for meaningful public input
- I515-5 Focus on storm water runoff prevention to protect property already cleaned up
- I515-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I515-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I515-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely, Barbara J Moore

Response to comment I515-1
See response to Comment No. I25-1.

Response to comment I515-2
See response to Comment No. I25-2.

Response to comment I515-3
See response to Comment No. I25-3.

Response to comment I515-4
See response to Comment No. I25-4.

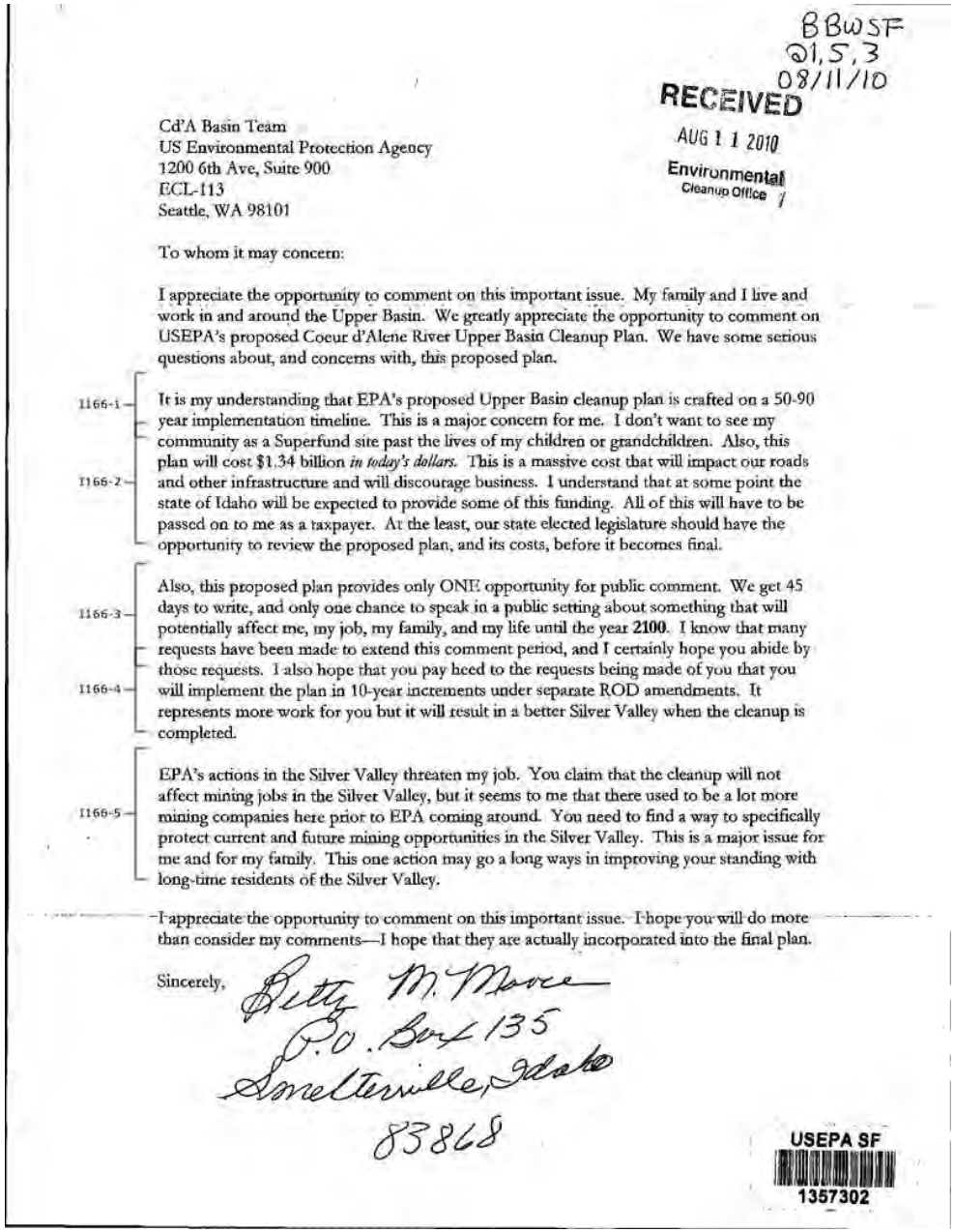
Response to comment I515-5
See response to Comment No. I25-5.

Response to comment I515-6
See response to Comment No. I25-6.

Response to comment I515-7
See response to Comment No. I25-7.

Response to comment I515-8
See response to Comment No. I25-8.

Moore, Betty, I166, Letter 1357302



BBWSF
Q1,5,3
08/11/10

RECEIVED
AUG 11 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I166-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I166-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I166-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by
I166-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I166-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Betty M. Moore
P.O. Box 135
Smelterville, Idaho
83868

USEPA SF
1357302

Response to comment I166-1
See response to Comment No. I58-1.

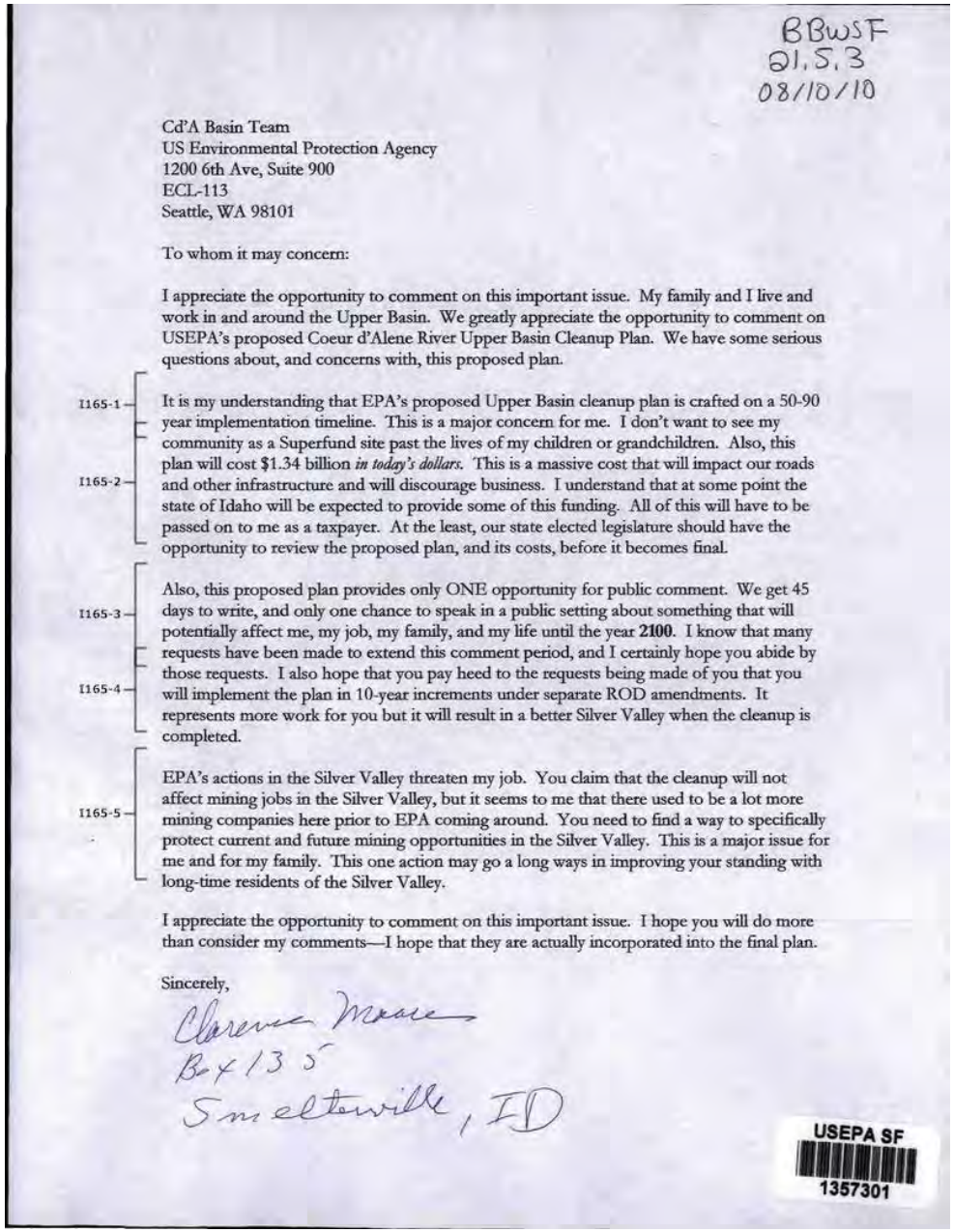
Response to comment I166-2
See response to Comment No. I58-2.

Response to comment I166-3
See response to Comment No. I58-3.

Response to comment I166-4
See response to Comment No. I58-4.

Response to comment I166-5
See response to Comment No. I58-5.

Moore, Clarence, I165, Letter 1357301



BBWSF
21.5.3
08/10/10

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I165-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I165-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I165-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many
I165-4 requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I165-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Clarence Moore
Box 135
Smeltervill, ID

USEPA SF
1357301

Response to comment I165-1
See response to Comment No. I58-1.

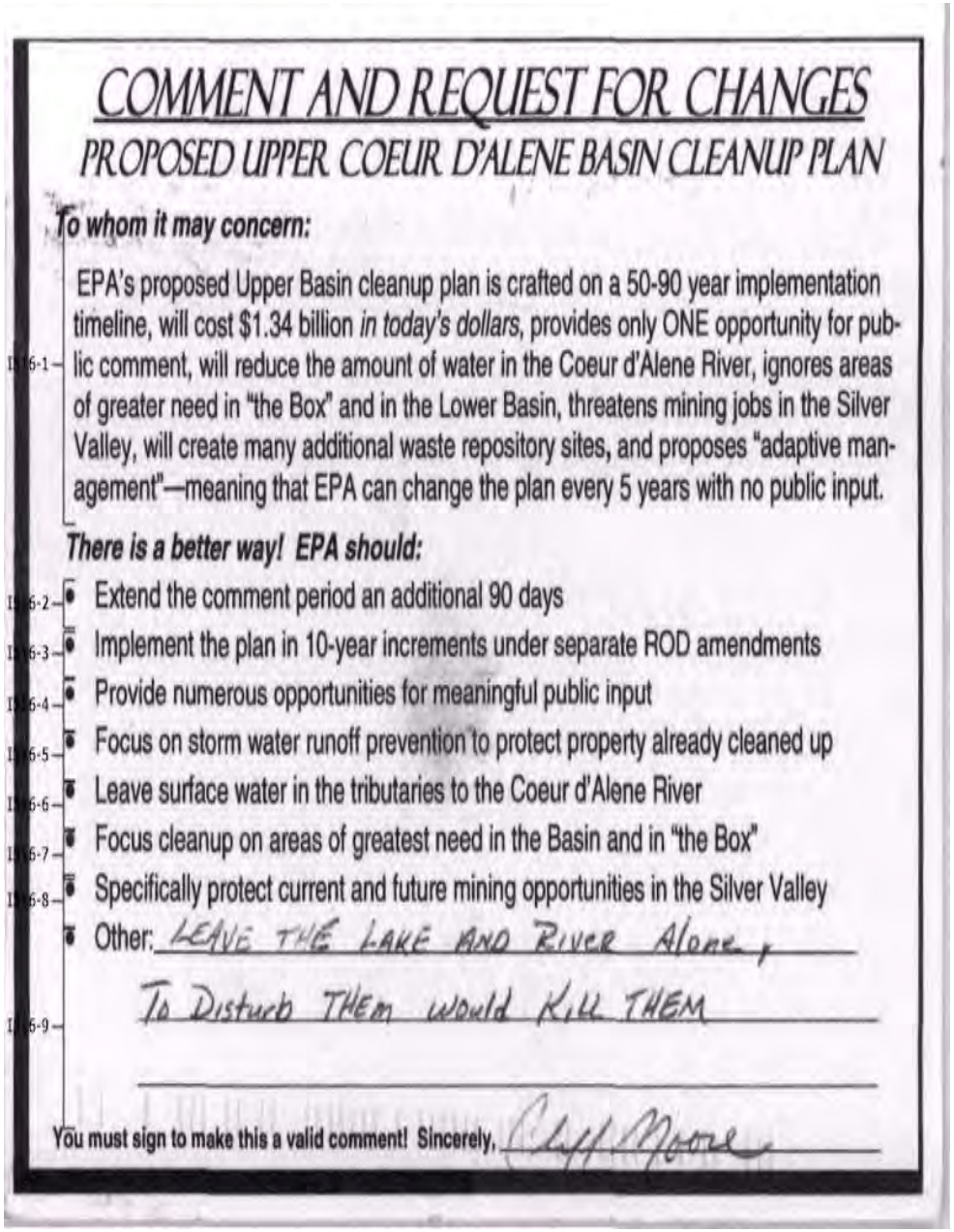
Response to comment I165-2
See response to Comment No. I58-2.

Response to comment I165-3
See response to Comment No. I58-3.

Response to comment I165-4
See response to Comment No. I58-4.

Response to comment I165-5
See response to Comment No. I58-5.

Moore, Cliff, I516, Letter 1357638



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I516-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I516-2 Extend the comment period an additional 90 days
- I516-3 Implement the plan in 10-year increments under separate ROD amendments
- I516-4 Provide numerous opportunities for meaningful public input
- I516-5 Focus on storm water runoff prevention to protect property already cleaned up
- I516-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I516-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I516-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: LEAVE THE LAKE AND RIVER Alone, To Disturb THEm would KILL THEM

I516-9

You must sign to make this a valid comment! Sincerely, Cliff Moore

Response to comment I516-1
See response to Comment No. I25-1.

Response to comment I516-2
See response to Comment No. I25-2.

Response to comment I516-3
See response to Comment No. I25-3.

Response to comment I516-4
See response to Comment No. I25-4.

Response to comment I516-5
See response to Comment No. I25-5.

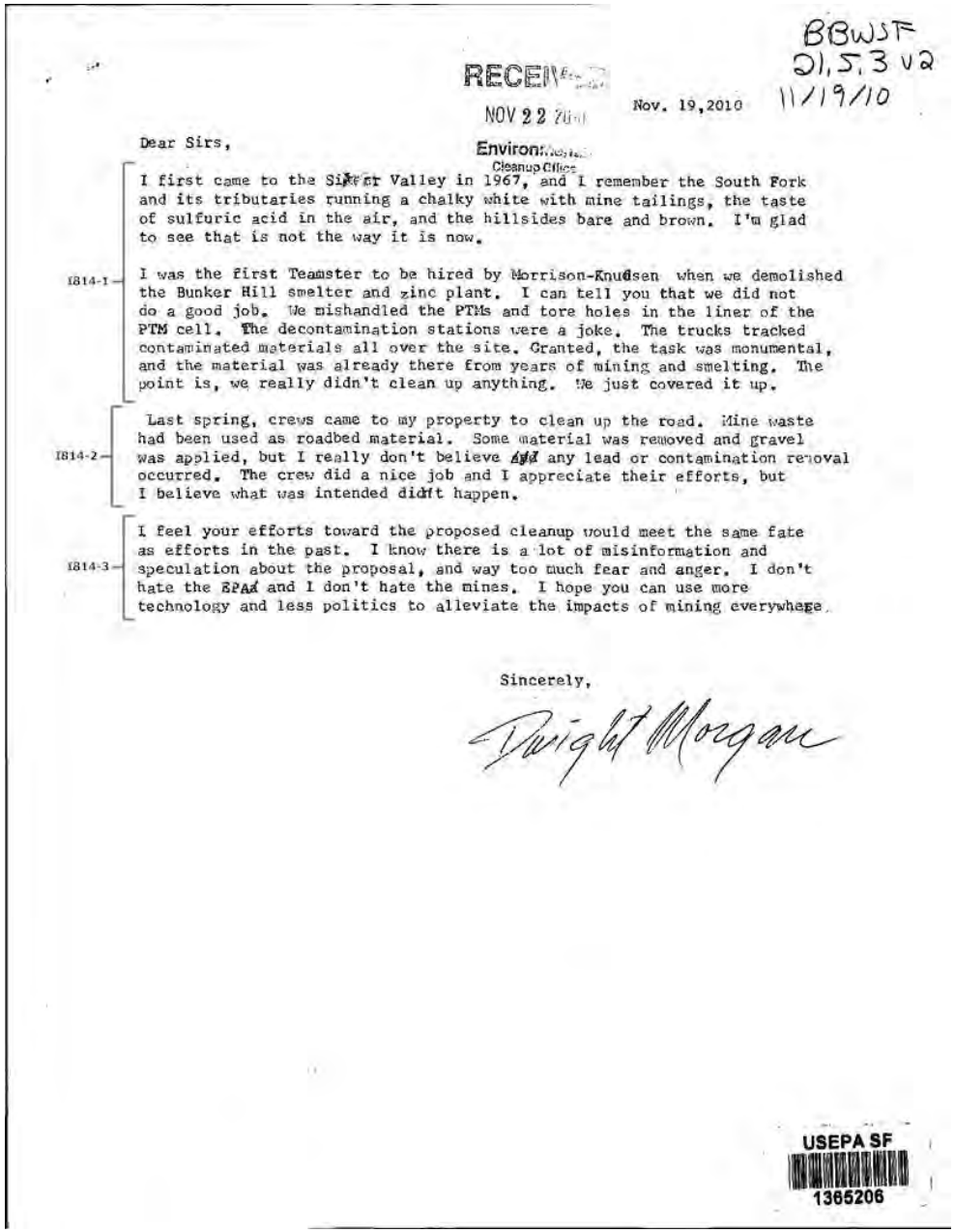
Response to comment I516-6
See response to Comment No. I25-6.

Response to comment I516-7
See response to Comment No. I25-7.

Response to comment I516-8
See response to Comment No. I25-8.

Response to comment I516-9
Comment noted.

Morgan, Dwight, I814, Letter 1365206



BBWST
21,5,3 v2
11/19/10

RECEIVED
NOV 22 2010
Environmental Cleanup Office

Nov. 19,2010

Dear Sirs,

I first came to the Silver Valley in 1967, and I remember the South Fork and its tributaries running a chalky white with mine tailings, the taste of sulfuric acid in the air, and the hillsides bare and brown. I'm glad to see that is not the way it is now.

I814-1 I was the first Teamster to be hired by Morrison-Knudsen when we demolished the Bunker Hill smelter and zinc plant. I can tell you that we did not do a good job. We mishandled the PTMs and tore holes in the liner of the PTM cell. The decontamination stations were a joke. The trucks tracked contaminated materials all over the site. Granted, the task was monumental, and the material was already there from years of mining and smelting. The point is, we really didn't clean up anything. We just covered it up.

I814-2 Last spring, crews came to my property to clean up the road. Mine waste had been used as roadbed material. Some material was removed and gravel was applied, but I really don't believe any lead or contamination removal occurred. The crew did a nice job and I appreciate their efforts, but I believe what was intended didn't happen.

I814-3 I feel your efforts toward the proposed cleanup would meet the same fate as efforts in the past. I know there is a lot of misinformation and speculation about the proposal, and way too much fear and anger. I don't hate the EPA and I don't hate the mines. I hope you can use more technology and less politics to alleviate the impacts of mining everywhere.

Sincerely,

Dwight Morgan

USEPA SF
1365206

Response to comment I814-1

Comment noted. Waste generated during demolition of the Bunker Hill smelter and zinc plant were disposed of in the Smelter Closure Area. EPA evaluates the effectiveness of the Smelter Closure Area during the CERCLA required five year reviews. To date EPA has concluded that the remedial actions implemented in the Bunker Hill smelter and zinc plant area are operating as intended and are protective of human health and the environment.

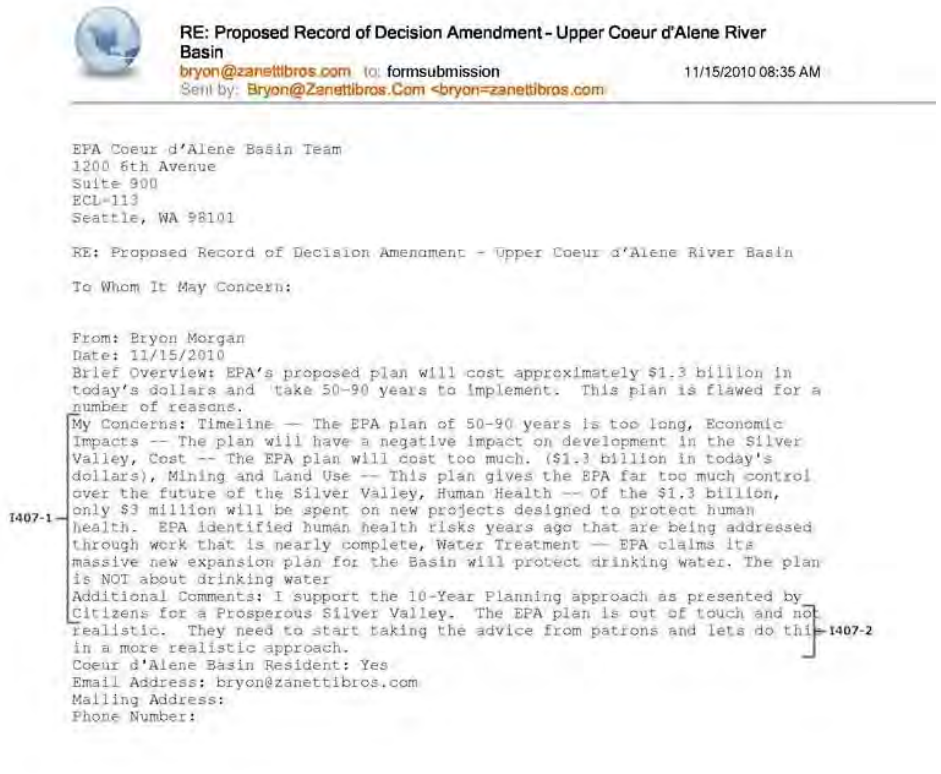
Response to comment I814-2

Properties, including roadways, are not remediated unless samples from the property show lead at concentrations above safe levels. Also see response to Comment No. I521-8.

Response to comment I814-3

Thank you for your comment. EPA is committed to selecting cleanup actions based on the best scientific and technological information available and to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has engaged the public through all phases of its work. Most importantly, EPA has encouraged the public to be involved in selection of the remedies for OUs 1, 2, and 3 and, most recently, the Selected Remedy for the Upper Basin.

Morgan, Byron, I407, Letter 616306



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
bryon@zanettibros.com to: formsubmission 11/15/2010 08:35 AM
Sent by: Bryon@Zanettibros.Com <bryon=zanettibros.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Bryon Morgan
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. The EPA plan is out of touch and not realistic. They need to start taking the advice from patrons and lets do this in a more realistic approach.
Coeur d'Alene Basin Resident: Yes
Email Address: bryon@zanettibros.com
Mailing Address:
Phone Number:

I407-1

I407-2

616306

Response to comment I407-1

See response to Comment No. I351-1.

Response to comment I407-2

See response to Comment No. I295-2.

Morino, Fred, I697, Letter 618307

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
fredmorino@yahoo.com to: formsubmission 11/17/2010 03:53 PM
Sent by: Fredmorino@Yahoo.Com <fredmorino=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Fred Morino
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I697-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: fredmorino@yahoo.com
Mailing Address: 3201 douglas Hwy|Juneau|Alaska|99801|US
Phone Number:

618307

Response to comment I697-1

See response to Comment No. I351-1.

Morton, Sam, I408, Letter 616307

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
sam_3rd@yahoo.com to: formsubmission 11/09/2010 11:46 AM
Sent by: Sam_3rd@Yahoo.Com <sam_3rd=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Sam Morton
Date: 11/09/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: sam_3rd@yahoo.com
Mailing Address:
Phone Number:

I408-1

616307

Response to comment I408-1

See response to Comment No. I351-1.

Moye, Falma, I907, Letter 616309

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
falma@custertel.net to: formsubmission 11/14/2010 10:33 AM
Sent by: Falma@Custertel.Net <falma=custertel.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Falma moye
Date: 11/14/2010

I907-1 Brief Overview: Easn't anyone with EPA taken a look at the successes in the Silver Valley. The existing 10 year plan, which has been approved by the Idaho legislature, is based on actual data and is realistic and achievable. For EPA to try to force a 50 to 90 year plan on the citizens of Idaho and the Silver Valley is ludicrous.

I907-2 In addition by developing this comment deadline, the Idaho legislature is excluded from the comment period. The legislature will eventually have to authorize funding and should have a key role in development of a plan.

I907-3 Bottom line is that the EPA potentially will have a severe negative impact on the economic stability and development of the Silver Valley for 50 years+.

I907-4 The estimated $1.3 billion dollars will be partially funded by the taxpayers of Idaho, who have little or no say in this matter.

I907-5 EPA has chosen to ignore existing data and recommendations of the national Academy of Science. NAS recommends focusing on high priority historic mine sites, using reliable data instead of EPA's predictive model, which is flawed.

I907-6 In addition NAS recognizes that this project should be realistic in developing and adaptive approach which would recognize cleanup stages . Progress and success would be evaluated using data collection. Realistic revisions would be adapted to meet goals and objectives.

I907-7 As a scientist, I am appalled by some of the recommendations in the amendment: 1) Why in the world would anyone place 10 miles of plastic liner in a natural stream bed? Does EPA really think that this engineered lined channel will survive extreme storm events?

I907-8 2) The plans to dewater the subsurface and move groundwater to Kellogg for treatment will have a severe impact on existing aquatic habitat. There would be no low flow conditions in Canyon Creek. Flows in the South Fork above Wallace would be reduced by more than 75%. All of these flow reductions will impact stream water quality including temperature. In addition, the reduction of natural flow regime will have long term negative impacts on stream bed morphology and habitat which are critical to aquatic life.

I907-9 3) Surely EPA can identify a means to address stream bed contamination without destroying existing habitat

I907-10 4) The proposed amendment potentially over rides state water rights.

I907-11 The 10 year plan should be adopted as the cleanup plan. Listen to the citizens of the Silver valley who want EPA out and their lives back. The

616309

Response to comment I907-1
See response to Comment No. I474-2.

Response to comment I907-2
See response to Comment No. LJ39-5.

Response to comment I907-3
See response to Comment No. I474-1.

Response to comment I907-4
See response to Comment No. I58-2 regarding the cost of the Selected Remedy. See response to Comment No. I295-3 regarding use of settlement funds to pay for cleanup.

Response to comment I907-5
See response to Comment No. LJ27-8.

Response to comment I907-6
EPA will implement cleanup actions selected in the ROD Amendment through an adaptive management approach. For additional detail see the ROD Amendment, Part 2, Section 12.3.

Response to comment I907-7
See response to Comment I828-10.

Response to comment I907-8
See response to Comment No. I54-8.

Response to comment I907-9
The ROD Amendment includes actions to restore habitat through stream and riparian stabilization actions where cleanup takes place in the river or stream.

Response to comment I907-10
See response Comment No. SA4-12.

Response to comment I907-11
See response to Comment No. I474-2.

I907-12 economy of that valley is tied to mining. Mining provides high paying jobs with excellent benefits. The economy tied to legal mining activities and expansion must be protected. EPA should not have any authority to impact legally permitted activities which provide jobs and support a vibrant economy in the Silver Valley.

I907-13 The mining companies involved with the Basin cleanup have done an excellent job. Within the framework of the 10 year plan they will continue to do just that. EPA's amendment is just a money sink that has little potential for success.

I907-14 Given EPA's current record of cleaning up 3 sites in 8 years, it is frightening to think how long the proposed amendment will really take. Maybe geologic time will come into play.

I907-15 Listen to the citizens of Idaho, especially residents of the Silver Valley. Let's get the job done in 10 years and move on.

Falma Moye PhD

I907-16 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: falma@custertel.net
Mailing Address: HC 63 Box 1607|Challis|Id|83226|US
Phone Number:

Response to comment I907-12

See response to Comment No. I58-5.

Response to comment I907-13

See response to Comment No. I474-2 regarding the Hecla 10-Year Plan. See response to Comment No. I58-2 regarding the cost of the Selected Remedy.

Response to comment I907-14

EPA has conducted significant cleanup work in the Basin. See the ROD Amendment, Part 2, Section 2.2 for details on previous cleanup activities. Also see the response to Comment No. 158-1.

Response to comment I907-15

See response to Comment No. I295-2 and the ROD Amendment, Part 2, Section 3.0 regarding EPA's efforts to involve the community in the decisionmaking process.

Response to comment I907-16

See response to Comment No. I351-1.

Mullen, Austin, I698, Letter 618313

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
austin-e@live.com to: formsubmission 11/19/2010 10:34 AM
Sent by: Austin-E@Live.Com <austin-e=live.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Austin Mullen
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: austin-e@live.com
Mailing Address:
Phone Number:

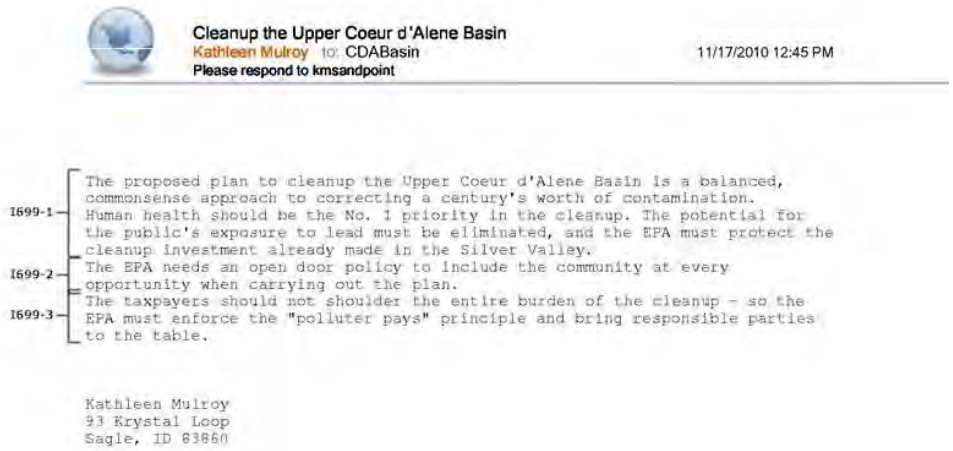
I698-1

618313

Response to comment I698-1

See response to Comment No. I351-1.

Mulroy, Kathleen, I699, Letter 618314



Cleanup the Upper Coeur d'Alene Basin
Kathleen Mulroy to: CDABasin 11/17/2010 12:45 PM
Please respond to kmsandpoint

I699-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I699-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I699-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Kathleen Mulroy
93 Krystal Loop
Sagle, ID 83860

618314

Response to comment I699-1

See response to Comment No. I295-1.

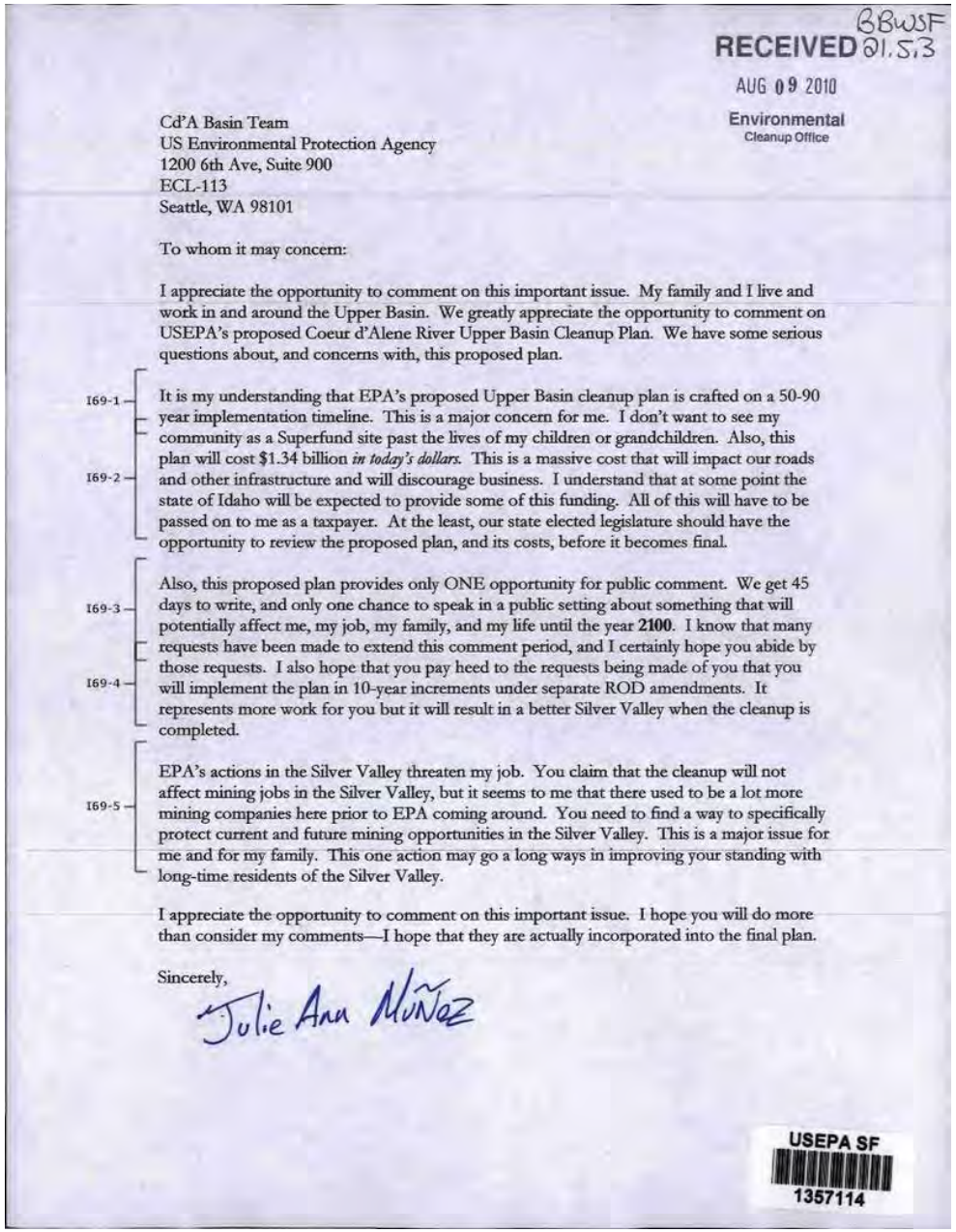
Response to comment I699-2

See response to Comment No. I295-2.

Response to comment I699-3

See response to Comment No. I295-3.

Munez, Julie Ann, I69, Letter 1357114



BBWSF
RECEIVED 21.5.3
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I69-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I69-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I69-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by
I69-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I69-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Julie Ann Muñoz

USEPA SF
1357114

Response to comment I69-1
See response to Comment No. I58-1.

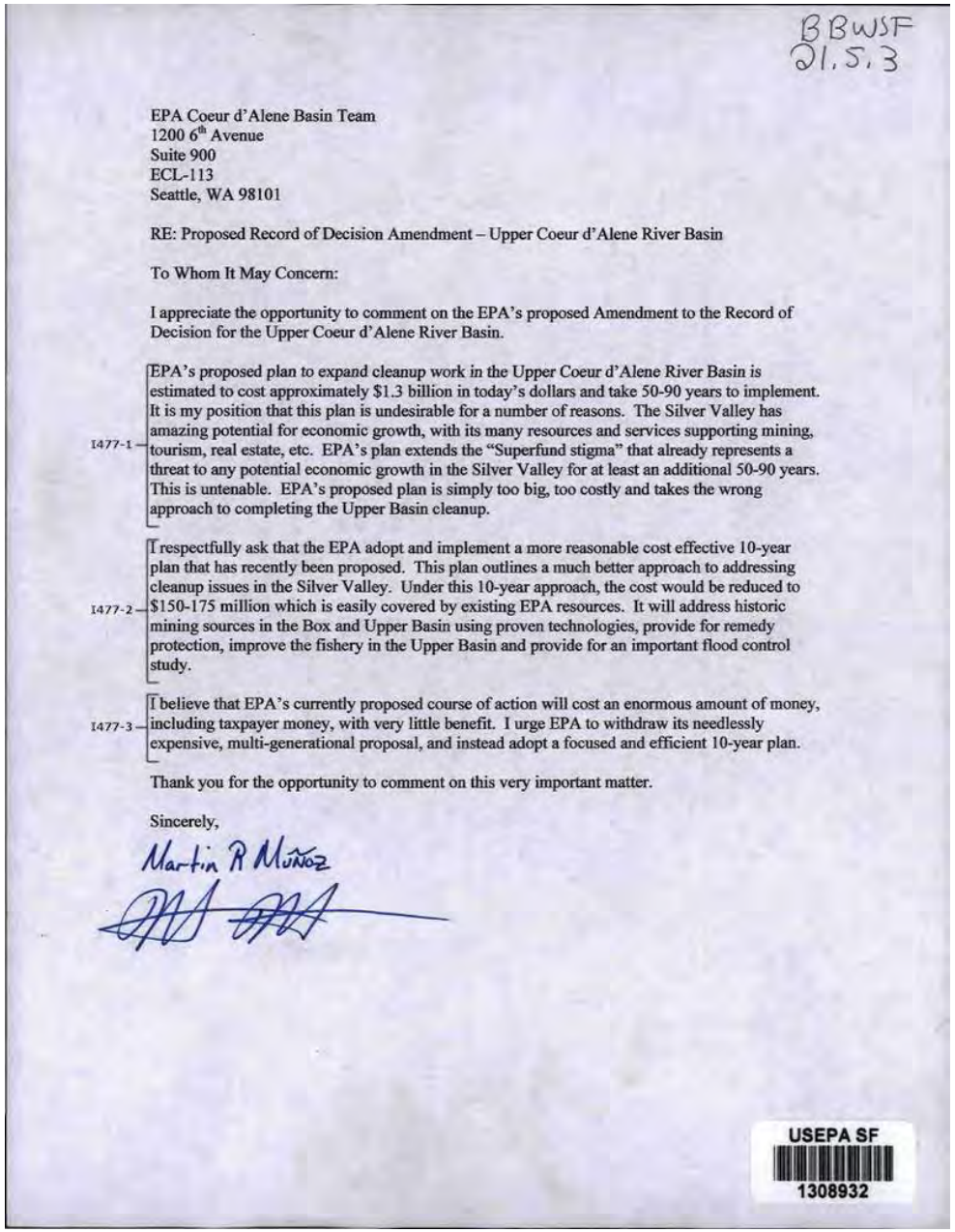
Response to comment I69-2
See response to Comment No. I58-2.

Response to comment I69-3
See response to Comment No. I58-3.

Response to comment I69-4
See response to Comment No. I58-4.

Response to comment I69-5
See response to Comment No. I58-5.

Munoz, Martin, I477, Letter 1308932



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I477-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I477-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I477-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Martin R Muñoz

USEPA SF
1308932

Response to comment I477-1

See response to Comment No. I474-1.

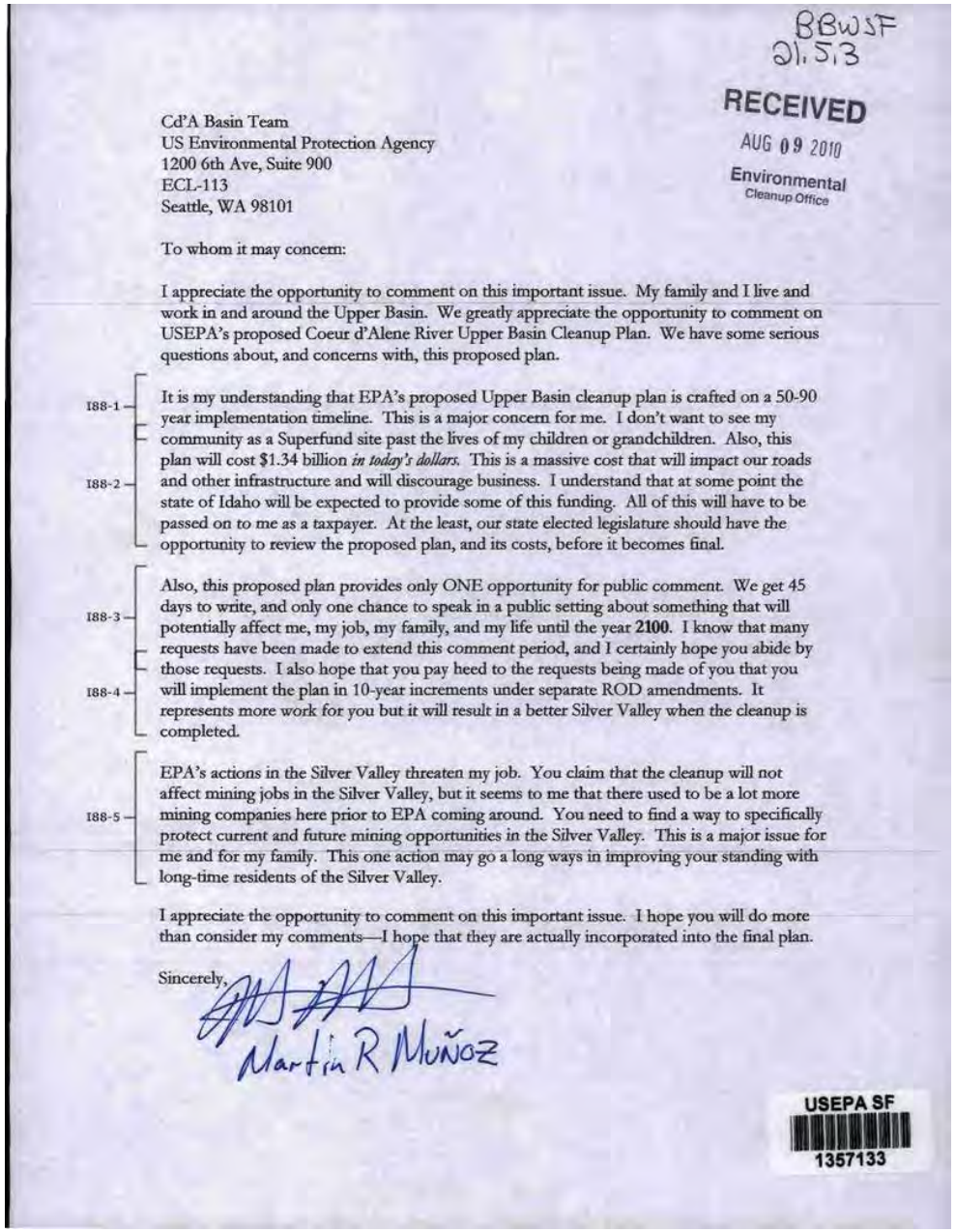
Response to comment I477-2

See response to Comment No. I474-2.

Response to comment I477-3

See response to Comment No. I474-3.

Munoz, Martin, I88, Letter 1357133



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I88-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I88-2 — plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I88-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I88-4 — will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I88-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Martin R Muñoz

USEPA SF
1357133

Response to comment I88-1
See response to Comment No. I58-1.

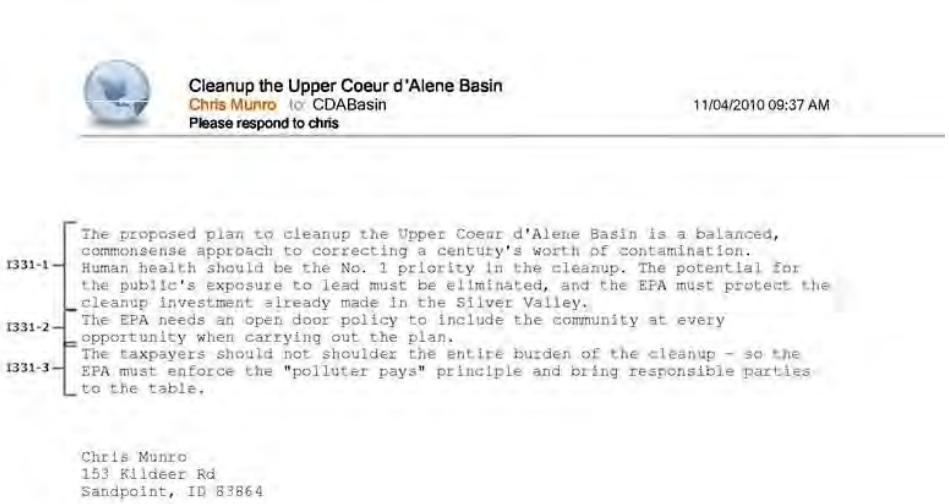
Response to comment I88-2
See response to Comment No. I58-2.

Response to comment I88-3
See response to Comment No. I58-3.

Response to comment I88-4
See response to Comment No. I58-4.

Response to comment I88-5
See response to Comment No. I58-5.

Munro, Chris, I331, Letter 614461



Cleanup the Upper Coeur d'Alene Basin
Chris Munro to: CDABasin 11/04/2010 09:37 AM
Please respond to chris

I331-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I331-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I331-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Chris Munro
153 Kildeer Rd
Sandpoint, ID 83864

614461

Response to comment I331-1

See response to Comment No. I295-1.

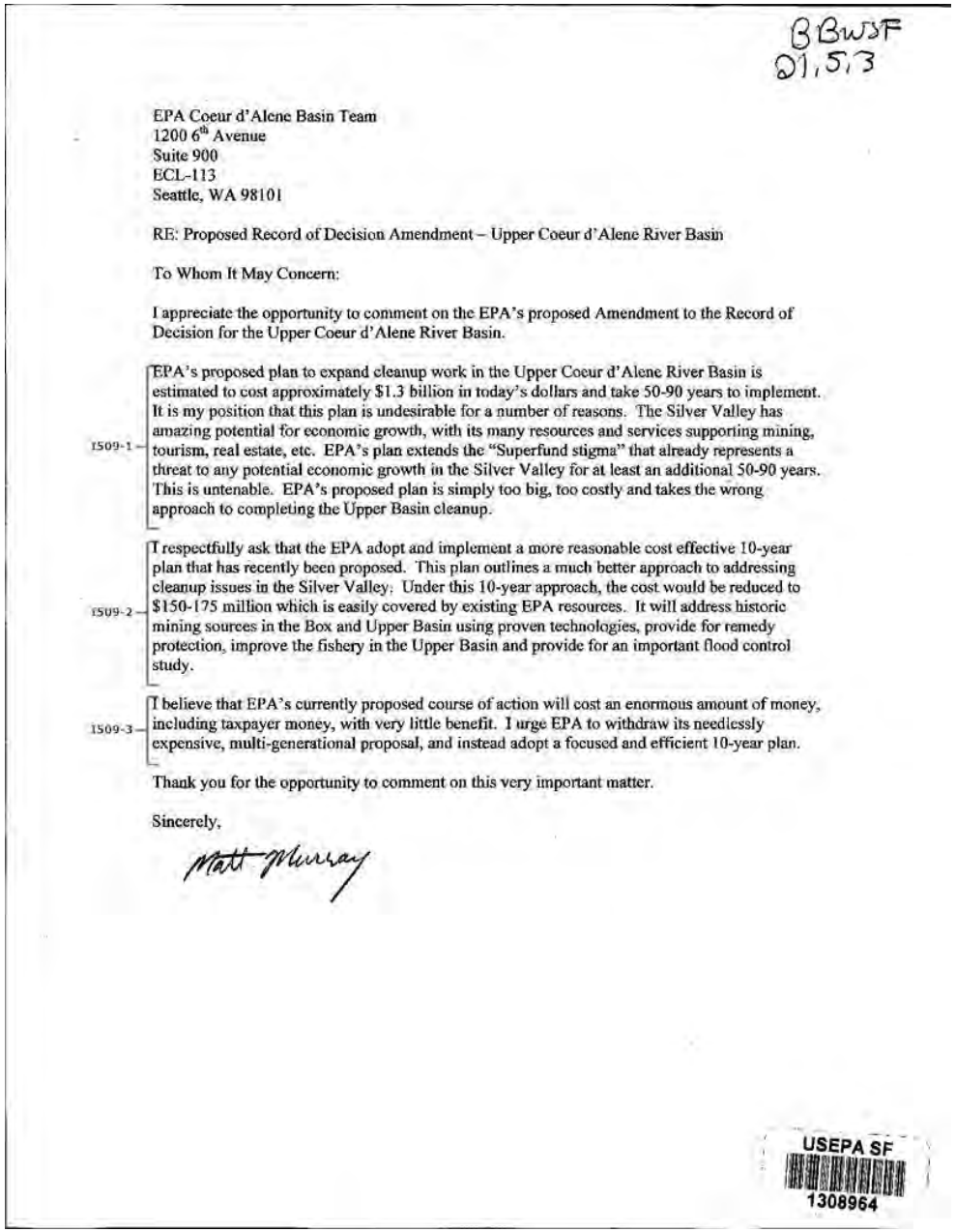
Response to comment I331-2

See response to Comment No. I295-2.

Response to comment I331-3

See response to Comment No. I295-3.

Murray, Matt, I509, Letter 1308964



BBWSF
21,513

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I509-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I509-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I509-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Matt Murray

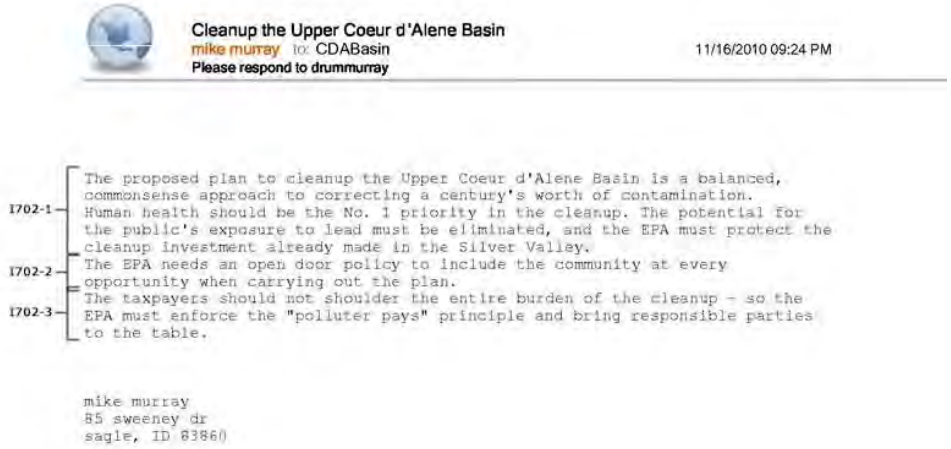
USEPA SF
1308964

Response to comment I509-1
See response to Comment No. I474-1.

Response to comment I509-2
See response to Comment No. I474-2.

Response to comment I509-3
See response to Comment No. I474-3.

Murray, Mike, I702, Letter 618317



Cleanup the Upper Coeur d'Alene Basin
mike murray to: CDABasin 11/16/2010 09:24 PM
Please respond to drummurray

I702-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I702-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I702-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

mike murray
85 sweeney dr
sagle, ID 8386[illegible]

618317

Response to comment I702-1

See response to Comment No. I295-1.

Response to comment I702-2

See response to Comment No. I295-2.

Response to comment I702-3

See response to Comment No. I295-3.

Murray, Warren, I700, Letter 618315

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
warrenmurray03@yahoo.com to formsubmission 11/18/2010 03:16 PM
Sent by: Warrenmurray03@Yahoo.Com <warrenmurray03=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Warren Murray
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: warrenmurray03@yahoo.com
Mailing Address: 9323 n government way|Hayden|ID|83835|US
Phone Number: (208) 699-5260

I700-1

618315

Response to comment I700-1

See response to Comment No. I351-1.

Muzik, Nick; Muzik, Carol, I448, Letter 898787

Cleanup Plan Comment
The Muziks
to:
CDABasin
09/08/2010 04:51 PM
Show Details

History: This message has been replied to.
Dear EPA,
I448-1 We are going to make this short.
It is extremely valuable to the health of this region that the Upper Basin be cleaned up.
I448-2 EPA needs to remind people that the run-off has to be stopped and that this will create JOBS for the locals.
I448-3 We think your strategy needs to be developed so you are appealing to the common everyday guy and he can see the benefit of having you around.
I448-4 Do not let these mining companies dictate the conversation.
I448-5 You have to stop the source of the toxins - this won't resolve itself.
Sincerely,
Carol and Nick Muzik
Rockford Bay
Coeur d' Alene ID 83814
We are also former Silver Valley residents

898787

Response to comment I448-1
Thank you for your comment. See response to Comment No. I295-1.

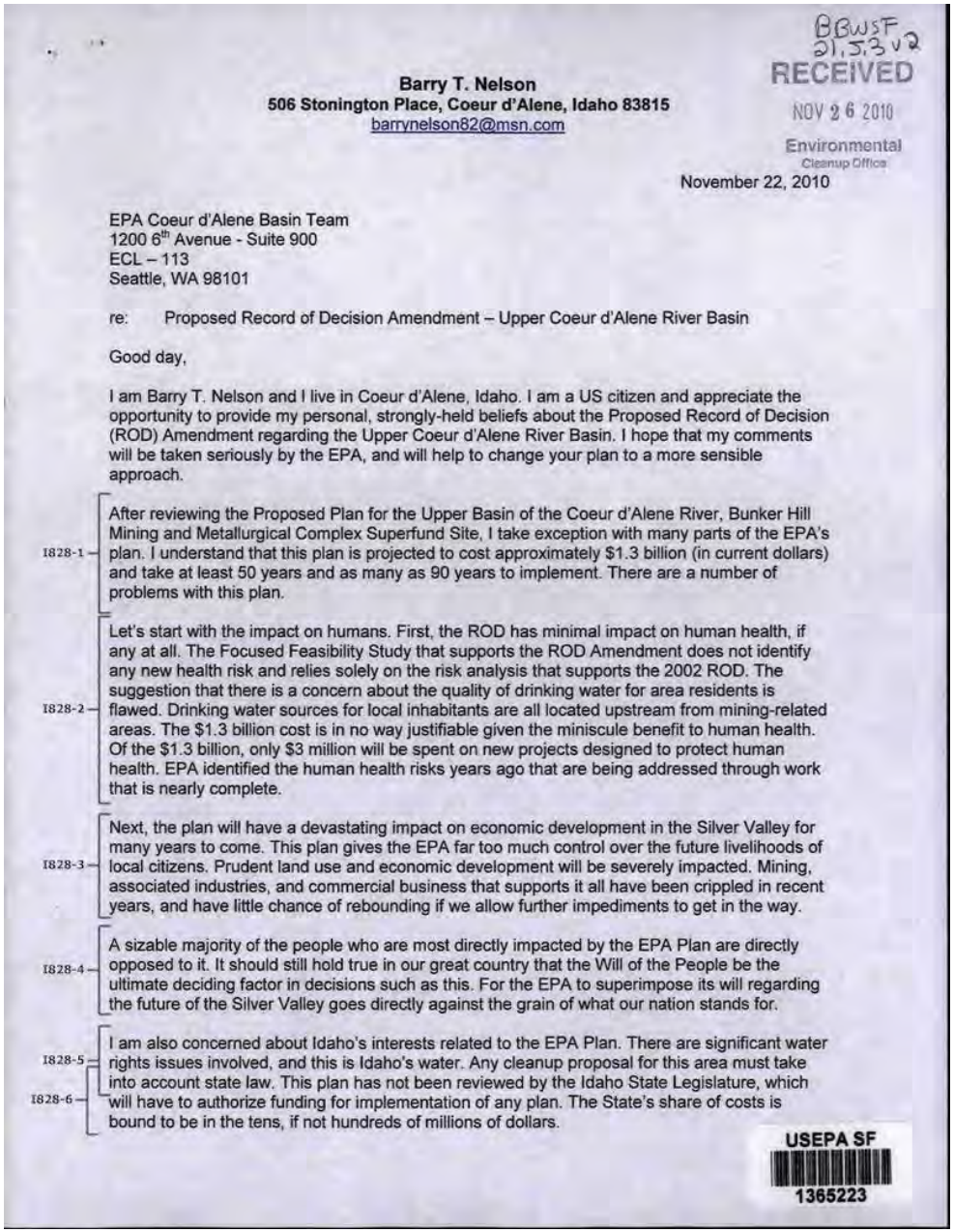
Response to comment I448-2
Please see response to Comment No. I54-5 for information regarding remedy protection actions included in the Selected Remedy.

Response to comment I448-3
Thank you for your comment. EPA knows that this is a complex site and that the science and technical information can be hard to interpret. The agency seeks to present information in ways that are useful for the non-scientist. EPA also uses many communication channels to reach people with information about involvement opportunities and cleanup developments. EPA encourages local residents to get involved, learn about the cleanup, and share their input with agency representatives.

Response to comment I448-4
Thank you for your comment.

Response to comment I448-5
Source control is a major component of the Selected Remedy for the Upper Basin. Planned source control actions include extensive excavation of waste rock, tailings, and floodplain sediments; capping, regrading, and revegetation; and hydraulic isolation at select locations.

Nelson, Barry T., I828, Letter 1365223



BBWSF 21.5.3 v2

RECEIVED
NOV 26 2010
Environmental Cleanup Office

Barry T. Nelson
506 Stonington Place, Coeur d'Alene, Idaho 83815
barrynelson82@msn.com

November 22, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue - Suite 900
ECL – 113
Seattle, WA 98101

re: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

Good day,

I am Barry T. Nelson and I live in Coeur d'Alene, Idaho. I am a US citizen and appreciate the opportunity to provide my personal, strongly-held beliefs about the Proposed Record of Decision (ROD) Amendment regarding the Upper Coeur d'Alene River Basin. I hope that my comments will be taken seriously by the EPA, and will help to change your plan to a more sensible approach.

I828-1 After reviewing the Proposed Plan for the Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site, I take exception with many parts of the EPA's plan. I understand that this plan is projected to cost approximately $1.3 billion (in current dollars) and take at least 50 years and as many as 90 years to implement. There are a number of problems with this plan.

I828-2 Let's start with the impact on humans. First, the ROD has minimal impact on human health, if any at all. The Focused Feasibility Study that supports the ROD Amendment does not identify any new health risk and relies solely on the risk analysis that supports the 2002 ROD. The suggestion that there is a concern about the quality of drinking water for area residents is flawed. Drinking water sources for local inhabitants are all located upstream from mining-related areas. The $1.3 billion cost is in no way justifiable given the miniscule benefit to human health. Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified the human health risks years ago that are being addressed through work that is nearly complete.

I828-3 Next, the plan will have a devastating impact on economic development in the Silver Valley for many years to come. This plan gives the EPA far too much control over the future livelihoods of local citizens. Prudent land use and economic development will be severely impacted. Mining, associated industries, and commercial business that supports it all have been crippled in recent years, and have little chance of rebounding if we allow further impediments to get in the way.

I828-4 A sizable majority of the people who are most directly impacted by the EPA Plan are directly opposed to it. It should still hold true in our great country that the Will of the People be the ultimate deciding factor in decisions such as this. For the EPA to superimpose its will regarding the future of the Silver Valley goes directly against the grain of what our nation stands for.

I828-5 I am also concerned about Idaho's interests related to the EPA Plan. There are significant water rights issues involved, and this is Idaho's water. Any cleanup proposal for this area must take into account state law. This plan has not been reviewed by the Idaho State Legislature, which

I828-6 will have to authorize funding for implementation of any plan. The State's share of costs is bound to be in the tens, if not hundreds of millions of dollars.

USEPA SF
1365223

Response to comment I828-1

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I828-2

EPA has consistently stated and shown that protection of human health in the Coeur d'Alene Basin is its highest priority. To date, millions of dollars have been spent implementing the Selected Human Health Remedies described in the existing RODs for OUs 1, 2, and 3. The Selected Human Health Remedy for OU 1, described in the 1991 ROD (EPA, 1991, www.epa.gov/superfund/sites/rods/fulltext/r1091028.pdf) and performed by the Upstream Mining Group under the 1994 Consent Decree, has been certified complete. Human health actions in the Upper Basin and Lower Basin (OU 3) are ongoing. Although human health is the highest priority, EPA is also required to address the significant risks to the environment that still exist. The Upper Basin Selected Remedy includes an estimated $33.9 million for remedy protection work in the Upper Basin. Remedy protection is intended to protect the existing human health clean soil barriers (e.g., remediated yards and rights-of-way) within Upper Basin communities from tributary flooding and high-precipitation events. In addition to the remedy protection work, cleanup actions that address mine waste contamination within drainage areas accessible for recreational use will protect human health and improve surface water quality. Common recreational activities in the Coeur d'Alene Basin include hiking, fishing, hunting, boating, swimming, and all-terrain-vehicle riding. As noted in the ROD Amendment, Part 3, Section 3.2.4, exposure to lead contamination can cause elevated blood lead levels. EPA has also found that elevated blood lead levels can occur within relatively short exposure periods (such as through recreational exposure to contamination located along the SFCDR, on waste piles, etc.). The Selected Remedy will provide clean surface soil in contaminated areas and reduce particulate lead loading to surface water. In these ways, the Selected Remedy will further reduce the risks people may be exposed to during recreational activities. Regarding the scope and cost of the Selected Remedy, see responses to Comment Nos. I58-1 and I58-2. Regarding drinking water, see the ROD Amendment, Part 3, Section 3.3.1.

Response to comment I828-3

See responses to Comment Nos. I474-1 and I58-5.

Response to comment I828-4

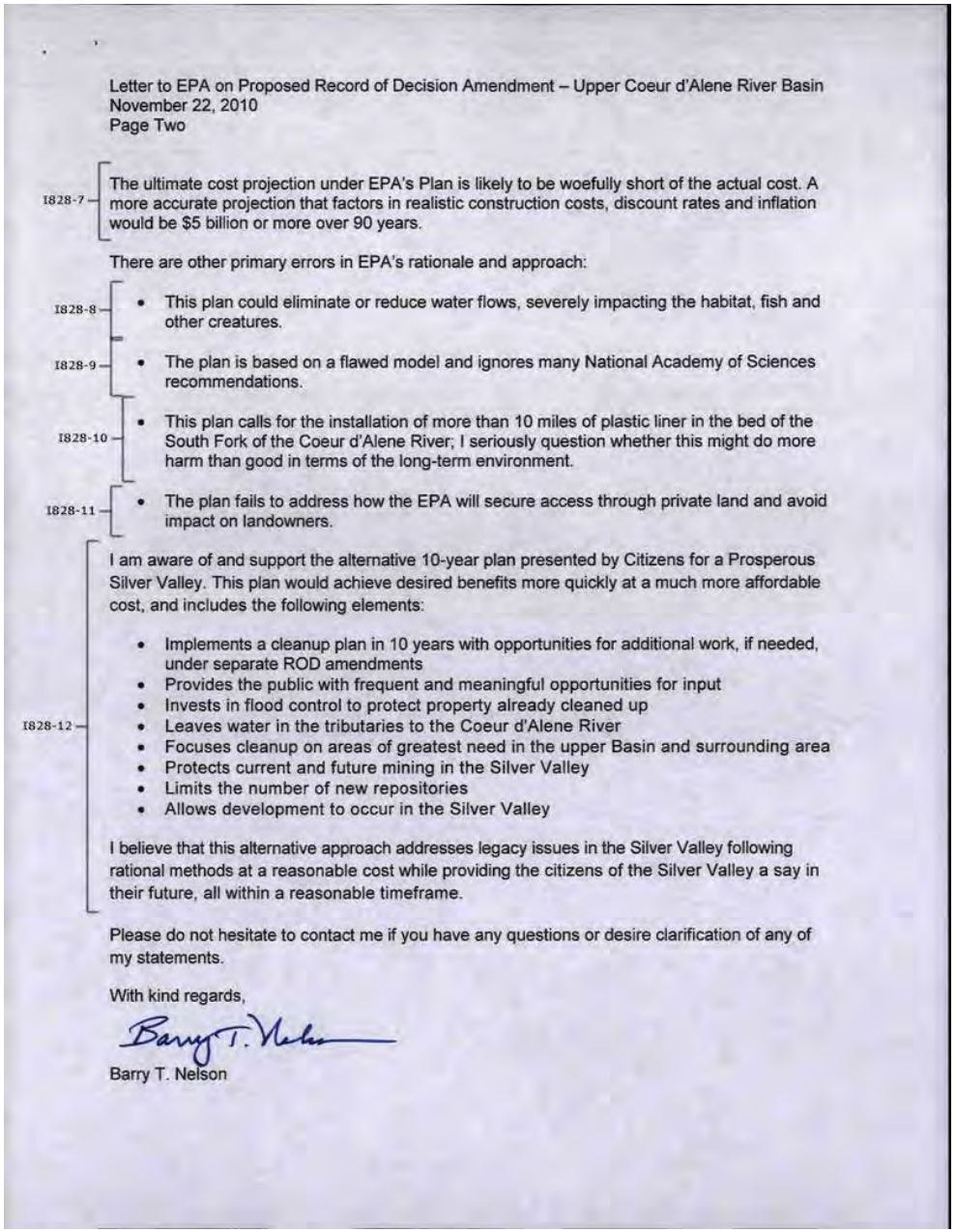
EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Response to comment I828-5

EPA intends to implement remedial actions selected for ground and surface in compliance with CERCLA as well state and federal water law. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I828-6

See response to Comment No. LJ39-5.



Letter to EPA on Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin
November 22, 2010
Page Two

I828-7 The ultimate cost projection under EPA's Plan is likely to be woefully short of the actual cost. A more accurate projection that factors in realistic construction costs, discount rates and inflation would be $5 billion or more over 90 years.

There are other primary errors in EPA's rationale and approach:

I828-8 • This plan could eliminate or reduce water flows, severely impacting the habitat, fish and other creatures.

I828-9 • The plan is based on a flawed model and ignores many National Academy of Sciences recommendations.

I828-10 • This plan calls for the installation of more than 10 miles of plastic liner in the bed of the South Fork of the Coeur d'Alene River; I seriously question whether this might do more harm than good in terms of the long-term environment.

I828-11 • The plan fails to address how the EPA will secure access through private land and avoid impact on landowners.

I am aware of and support the alternative 10-year plan presented by Citizens for a Prosperous Silver Valley. This plan would achieve desired benefits more quickly at a much more affordable cost, and includes the following elements:

I828-12
- Implements a cleanup plan in 10 years with opportunities for additional work, if needed, under separate ROD amendments
- Provides the public with frequent and meaningful opportunities for input
- Invests in flood control to protect property already cleaned up
- Leaves water in the tributaries to the Coeur d'Alene River
- Focuses cleanup on areas of greatest need in the upper Basin and surrounding area
- Protects current and future mining in the Silver Valley
- Limits the number of new repositories
- Allows development to occur in the Silver Valley

I believe that this alternative approach addresses legacy issues in the Silver Valley following rational methods at a reasonable cost while providing the citizens of the Silver Valley a say in their future, all within a reasonable timeframe.

Please do not hesitate to contact me if you have any questions or desire clarification of any of my statements.

With kind regards,

Barry T. Nelson

Response to comment I828-7

See response to Comment No. I54-12.

Response to comment I828-8

See response to comments LC33-10.

Response to comment I828-9

See response to Comment No. LJ27-8.

Response to comment I828-10

In response to public and stakeholder comments on the Proposed Plan, EPA reviewed this part of the remedy and decided to modify the hydraulic isolation action in the SFCDR between Wallace and Elizabeth Park, as documented in the ROD Amendment. The full length of the SFCDR stream liner has been eliminated. In addition, the groundwater collection drain has been shortened significantly to extend only through the Osburn area (about 4,600 feet). Interactions between surface water and groundwater, and metals loading to the SFCDR are relatively well understood in this area. This is because more investigations have been conducted for the Osburn area compared to the remaining reaches of the SFCDR between Wallace and Elizabeth Park. This information has enabled actions in that area to be refined. EPA will monitor and evaluate the effectiveness of the modified approach as the remedy is carried out and using the adaptive management process. Similarly, the remaining SFCDR reaches between Wallace and Elizabeth Park will be monitored to determine whether any additional action(s) may be needed to meet water quality standards.

Response to comment I828-11

EPA does not have the authority to secure access to private property by the issuance of a ROD. CERCLA Section 104(e) provides EPA with such authority. EPA will work with owners of private party to secure access by agreement and anticipates that it will be able to obtain access consensually. In addition, EPA intends to work with private property owners to minimize impacts to their use and enjoyment of property.

Response to comment I828-12

See response to Comment No. I474-2.

Nelson, Alan, I705, Letter 618320

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
alanmelson@yahoo.com to: formsubmission 11/19/2010 09:10 AM
Sent by: Alanmelson@Yahoo.Com <alanmelson=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Alan Nelson
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. One of the fundamental problems with the EPA's proposed amendment to the existing Record of Decision for cleanup in the Upper Coeur d'Alene River Basin is the fact that it ignores many of the primary recommendations from the National Academy of Sciences (NAS) review. The NAS recommended that any work plan for the Upper Coeur d'Alene River Basin should do the following:

a) Address the high priority historic mine site areas first, including in Canyon and Nine Mile Creeks and in the Box.

I705-1 b) Be data-driven instead of relying on EPA's flawed predictive model.

c) Focus on the achievement of actual data-driven measures of success, rather than on numerical standards.

d) Use an adaptive management approach which would address the cleanup in stages, evaluate progress and allow for the revision of goals and strategies based on effectiveness of actions taken over time.

EPA's proposed ROD amendment does none of these.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could
I705-2 eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by

618320

Response to comment I705-1

See response to Comment No. LJ27-8.

Response to comment I705-2

See response to Comment No. I351-1.

I705-2

Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: alanrnelson@yahoo.com
Mailing Address: 1334 S Nugget Drive|Coeur d Alene|Idaho|83814|US
Phone Number: (208) 765-4085

No comments

Nelson, Amy, I704, Letter 618319

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
RICHANDAMYN@LIVE.COM to: formsubmission 11/19/2010 09:19 AM
Sent by: Richandamyn@Live.Com <RICHANDAMYN=LIVE.COM

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Amy Nelson
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

EPA GO AWAY
Coeur d'Alene Basin Resident: Yes
Email Address: RICHANDAMYN@LIVE.COM
Mailing Address:
Phone Number:

I704-1

618319

Response to comment I704-1

See response to Comment No. I351-1.

Nelson, R.J., I409, Letter 616310

mailings
RJ Nelson
to:
CDABasin
11/12/2010 12:05 PM
Show Details

I409-1 Please remove my name from the Cda. basin cleanup. My name is Ralph Nelson at 1511 S. Ash St. in Spokane Wa. 99203 Thankyou for your time and I support your efforts in the cleanup. r.j. nelson

616310

Response to comment I409-1

Thank you for your comment. As requested your address will be removed from EPA's mailing list.

Nelson, Rich, I703, Letter 618318

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
richandamyn@live.com to: formsubmission 11/19/2010 09:18 AM
Sent by: Richandamyn@Live.Com <richandamyn=live.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

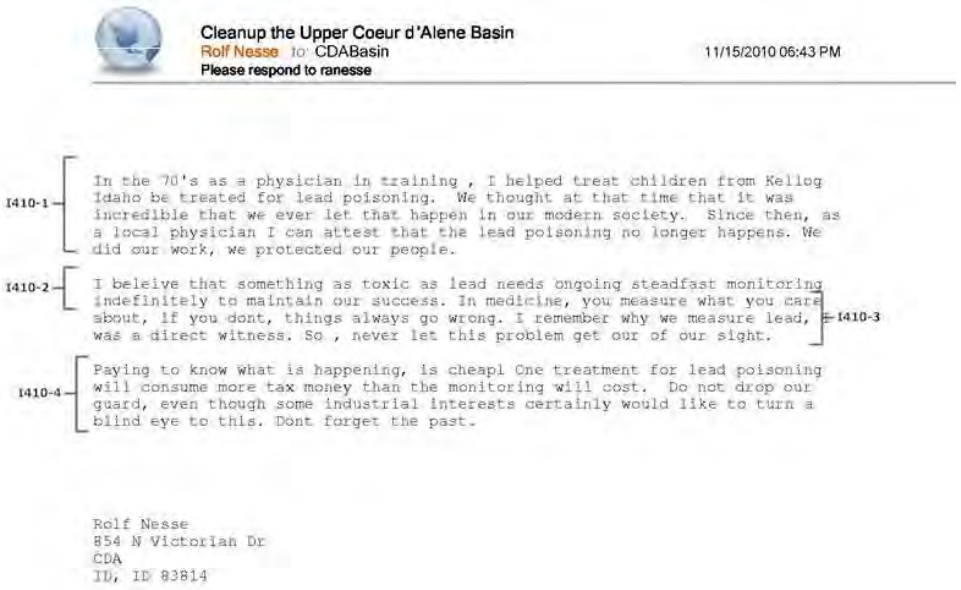
From: Rich Nelson
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I703-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: EPA STAY OUT OF THE SILVER VALLEY. WE ARE FINE!
Coeur d'Alene Basin Resident: Yes
Email Address: richandamyn@live.com
Mailing Address:
Phone Number:

618318

Response to comment I703-1

See response to Comment No. I351-1.

Nesse, Rolf, I410, Letter 616312



Cleanup the Upper Coeur d'Alene Basin
Rolf Nesse to: CDABasin 11/15/2010 06:43 PM
Please respond to ranesse

I410-1 In the 70's as a physician in training , I helped treat children from Kellog Idaho be treated for lead poisoning. We thought at that time that it was incredible that we ever let that happen in our modern society. Since then, as a local physician I can attest that the lead poisoning no longer happens. We did our work, we protected our people.

I410-2 I beleive that something as toxic as lead needs ongoing steadfast monitoring indefinitely to maintain our success. In medicine, you measure what you care about, if you dont, things always go wrong. I remember why we measure lead, I410-3 was a direct witness. So , never let this problem get our of our sight.

I410-4 Paying to know what is happening, is cheapl One treatment for lead poisoning will consume more tax money than the monitoring will cost. Do not drop our guard, even though some industrial interests certainly would like to turn a blind eye to this. Dont forget the past.

Rolf Nesse
854 N Victorian Dr
CDA
ID, ID 83814

616312

Response to comment I410-1

See response to Comment No. I295-1.

Response to comment I410-2

Thank you for your comment. EPA has prioritized cleanup actions to reduce human health exposures, primarily to lead, and has conducted analyses of remedy effectiveness to support the Basin-wide Five-Year Reviews. In the summer, annual blood lead screening is provided free of charge throughout the Panhandle Health District. At other times of the year, blood lead screening can be arranged by contacting the Panhandle Health District.

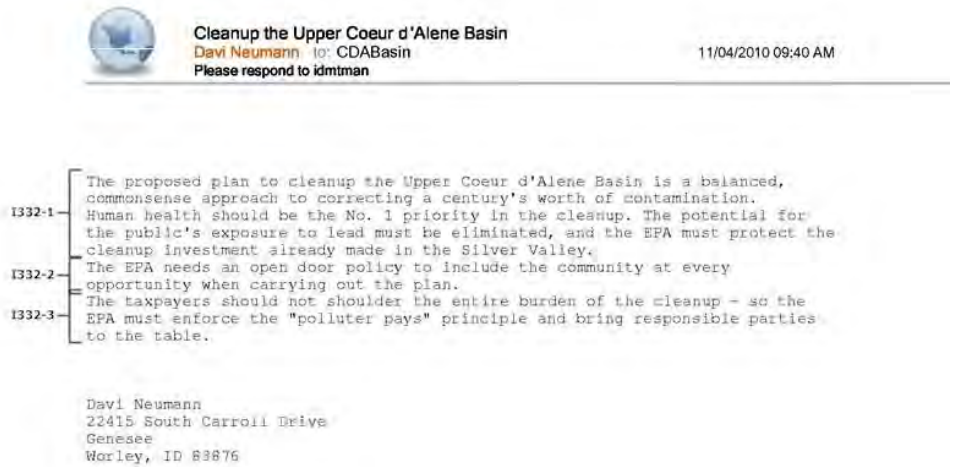
Response to comment I410-3

Thank you for your comment.

Response to comment I410-4

See response to Comment No. I295-1.

Neumann, Davi, I332, Letter 614462



Cleanup the Upper Coeur d'Alene Basin
Davi Neumann to: CDABasin 11/04/2010 09:40 AM
Please respond to idmtman

I332-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I332-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I332-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Davi Neumann
22415 South Carroll Drive
Genesee
Worley, ID 83876

614462

Response to comment I332-1

See response to Comment No. I295-1.

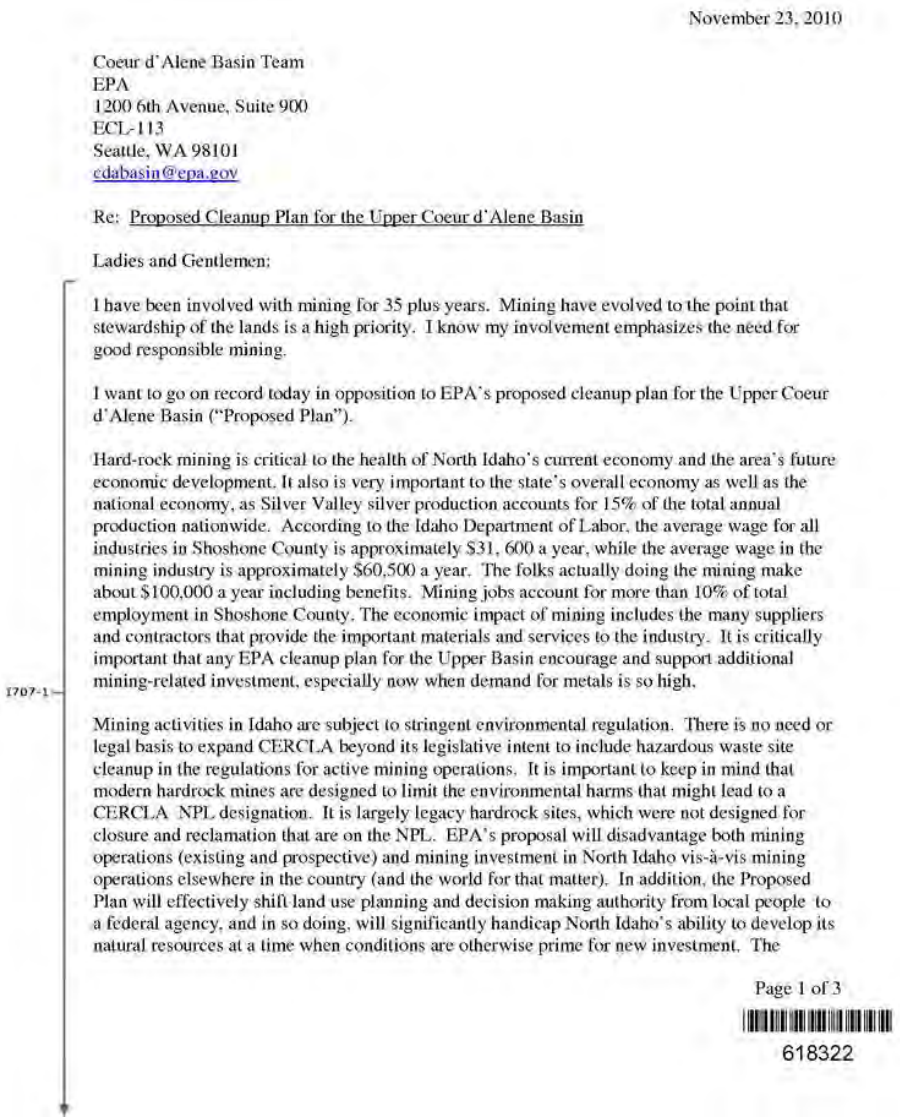
Response to comment I332-2

See response to Comment No. I295-2.

Response to comment I332-3

See response to Comment No. I295-3.

Neunschwander, Michael, I707, Letter 618322



November 23, 2010

Coeur d'Alene Basin Team
EPA
1200 6th Avenue, Suite 900
ECL-113
Seattle, WA 98101
cdabasin@epa.gov

Re: Proposed Cleanup Plan for the Upper Coeur d'Alene Basin

Ladies and Gentlemen:

I have been involved with mining for 35 plus years. Mining have evolved to the point that stewardship of the lands is a high priority. I know my involvement emphasizes the need for good responsible mining.

I want to go on record today in opposition to EPA's proposed cleanup plan for the Upper Coeur d'Alene Basin ("Proposed Plan").

Hard-rock mining is critical to the health of North Idaho's current economy and the area's future economic development. It also is very important to the state's overall economy as well as the national economy, as Silver Valley silver production accounts for 15% of the total annual production nationwide. According to the Idaho Department of Labor, the average wage for all industries in Shoshone County is approximately $31, 600 a year, while the average wage in the mining industry is approximately $60,500 a year. The folks actually doing the mining make about $100,000 a year including benefits. Mining jobs account for more than 10% of total employment in Shoshone County. The economic impact of mining includes the many suppliers and contractors that provide the important materials and services to the industry. It is critically important that any EPA cleanup plan for the Upper Basin encourage and support additional mining-related investment, especially now when demand for metals is so high.

I707-1

Mining activities in Idaho are subject to stringent environmental regulation. There is no need or legal basis to expand CERCLA beyond its legislative intent to include hazardous waste site cleanup in the regulations for active mining operations. It is important to keep in mind that modern hardrock mines are designed to limit the environmental harms that might lead to a CERCLA NPL designation. It is largely legacy hardrock sites, which were not designed for closure and reclamation that are on the NPL. EPA's proposal will disadvantage both mining operations (existing and prospective) and mining investment in North Idaho vis-à-vis mining operations elsewhere in the country (and the world for that matter). In addition, the Proposed Plan will effectively shift land use planning and decision making authority from local people to a federal agency, and in so doing, will significantly handicap North Idaho's ability to develop its natural resources at a time when conditions are otherwise prime for new investment. The

Page 1 of 3

618322

Response to comment I707-1

This letter is nearly identical to the letter submitted by the Idaho Mining Association. Please see responses to Document No. LC28 for responses to the Idaho Mining Association's comments.

Proposed Plan also ignores critically important state sovereignty and regulatory imperatives relative to water rights. All of these outcomes are unacceptable and unwarranted.

Starting with the implications for mining, the Proposed Plan will, for the first time, set stringent closure requirements for active tailings ponds that are in compliance with current law and regulatory requirements. This will set an unprecedented and arbitrary double standard for regulation of Silver Valley mining vs. mining elsewhere, to the serious economic disadvantage of the Silver Valley. EPA also says it will only allow new mining activity if it does not "impede" its cleanup plans. This approach is quite clearly intended to make EPA's cleanup plans a higher priority than anyone else's plans, for mining or any other development, effectively putting control of North Idaho's mining economy and economic future in EPA's hands. EPA simply is not justified or authorized to exercise this sort of control.

Similarly, EPA's Proposed Plan implicates and impinges on local land use control authorities. It is a fundamental tenet under our federal system that land use decision making is the right and responsibility of local governments, with some limited role for the State perhaps, but certainly not ever a federal prerogative. The Proposed Plan will undo those rules in the Silver Valley. As noted earlier, it is the Proposed Plan that will control local decision making on economic development. The EPA will need much of the flat ground in the Upper Basin, including existing tailings impoundments, for repository space, leaving little flat ground for any future revenue generating opportunities. EPA also plans to build miles of drains and plumbing along the South Fork and any new development presumably will be precluded unless that development is acceptable to EPA.

1707-1

The Proposed Plan withdraws huge quantities of water in the Upper South Fork of the Coeur d' Alene River and its tributaries above Elizabeth Park for treatment that will have significant impacts on the river and, by extension, on water rights in the Upper South Fork. Those rights are currently in adjudication, pursuant to State law. Is EPA planning to acknowledge State law and participate in that adjudication? EPA's proposed withdrawals would also trigger State permitting requirements, and possibly even require approval by the Idaho Legislature. EPA's proposed withdrawals will also be subject to Idaho's conjunctive management rules and EPA will need to prove these withdrawals will not injure existing water rights. The Proposed Plan is silent on these very important considerations in addressing the feasibility and implementability of EPA's proposal. EPA also ignores the impact its proposal will have on the ability of Upper Basin industrial and municipal water dischargers that have NPDES permits to meet discharge limits on this stretch of river.

EPA's plan is simply too big, too costly and not well thought out. There are also serious questions about whether what EPA proposes is legally permissible or implementable. EPA should instead adopt a realistic and cost-effective 10-year planning approach along the lines of the alternative 10-Year Plan that has been offered in response to EPA's proposal. That plan presents a data-driven, cost-effective approach to remediating high priority historic mining sites with proven technologies that have a high probability of success. At the end of 10 years, cleanup goals and remaining cleanup needs can be evaluated in light of the progress to date. Among other things, the 10-Year Plan respects the limits of federal authority, respects the role and

No comments

IMA – November 23, 2010

importance of mining in the Valley and the rights and freedom of Silver Valley residents to direct their future.

In addition, I have reviewed the comments of the Northwest Mining Association (NWMA) dated November 23, 2010, in particular the comments on the Proposed Plan prepared by ARCADIS U.S., Inc., wherein ARCADIS concludes that the Proposed Plan:

1707-1

- encompasses too large of an area,
- fails to meet ARARs,
- prescribes remedial activities that are not implementable at costs that are proportional to benefits,
- does not demonstrate effectiveness, including protectiveness, over a reasonable amount of time, and
- is not compliant with the NCP in other ways.

ARCADIS further concludes that the phased 10-year plan is a much more reasoned approach and is both more protective and cost-effective at addressing the critical sources of contamination within a manageable time frame. I fully endorse the ARCADIS comments and incorporate them by reference into this comment letter.

Very truly yours,

Mike Neuenschwander

Page 3 of 3

No comments

Newcomb, Susan, I708, Letter 618323

FW: Silver Valley Comments
Citizens for Prosperous Silver Valley
to:
CDABasin
11/19/2010 11:33 AM
Show Details

From: Susan Newcomb [mailto:susan@dragonspoint.net]
Sent: Thursday, November 18, 2010 2:26 PM
To: info@ListenUpEPA.com
Subject: Silver Valley Comments

November 18 2010

To Lisa P. Jackson
Director
EPA

I708-1 When the Environmental Protection Agency was conceived 40 years ago, the point of the whole thing was to "protect" our environment-earth, water, and air. Such high-minded ideals were vastly lauded at the time. And at the time government as a whole did not look upon the American public as a bottomless "deep-pocket", a never-ending source of cash without cap or control.

I708-2 Today, government needs desperately to take a good long look at the ingenuity, resourcefulness, tenacity of the American People and Idahoans in particular. We have a long history of finding reasonable solutions to unreasonable problems.

I708-3 The Silver Valley Superfund VS. 10-Year Plan is a case in point.

1. Labeling an area "SuperFund" is akin to pasting a scarlet "U" for Unclean on an area - effectively destroying any hope for business or tourism in that area. The 10-Year Plan preserves the tourism and business industry while allowing the growth of same.

I708-4 2. Return to the principles upon which your agency was founded – protect the environment, the people, wildlife AND the area – Superfund will effectively and certainly make the entire area uninhabitable for the next 50 – 90 years and more. The 10-Year Plan is just that – 10 years.

I708-5 3. No one said it had to cost in the Billions of Dollars. Take a look, and then another look at the 10-Year Plan. The 150-175 Million Dollar price tag is not only reasonable, it is feasible and well within the scope of what actually needs to be done.

I708-6 4.The EPA Plan, which in effect consists of rerouting water (above and below ground) around contaminated areas does not nor will it ever mitigate the problem. The 10-Year Plan does. And at a fraction of the cost.

I708-7 5. So the question is: WHY? Why spend so much money when a better plan exists and costs so much less? Why destroy an entire area – the Silver Valley – along with the downstream area – Coeur d'Alene – when your agency can just as easily make growth and prosperity a reality? WHY move the

618323

Response to comment I708-1
Comment noted.

Response to comment I708-2
Thank you for your comment.

Response to comment I708-3
See responses to Comment Nos. I54-2 and I474-2.

Response to comment I708-4
See responses to Comment Nos. I58-1 and I474-2.

Response to comment I708-5
See responses to Comment Nos. I58-2 and I474-2.

Response to comment I708-6
See response to Comment No. I474-2.

Response to comment I708-7
See response to Comment No. I474-2.

I708-7 contamination from one area to another? What's the point.

I708-8 Protocols and technologies exist today that are far superior to anything available in the past. Check them out. PhytoRemediation (cleaning contaminated soils, water and air using plants) is better than ever. Check it out.

Respectfully,

Susan Newcomb
3425 N 4th St
Coeur d'Alene ID 83815
208.667.2201

Response to comment I708-8

Thank you for your comment.

Nodes, John; Nodes, Elaine, I710, Letter 618325

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
nodes@yahoo.com to: formsubmission 11/19/2010 02:13 PM
Sent by: Nodes@Yahoo.Com <nodes=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: John and Elaine Nodes
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I STRONGY support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. While I no longer live in Kellogg, 2 generations of my family plus aunts,uncles and cousins have called Kellogg our home since the 1930's; and our hearts remain there. Your plan is too aggressive and too expensive.
Any plan needs to incorporate some funds from the mines who are responsible for this mess. Clearly this is not a problem for ALL the nation's taxpapers to absorb.
I just don't see a lot of common sense in your plan.
Coeur d'Alene Basin Resident: No
Email Address: nodes@yahoo.com
Mailing Address: John & Elaine Nodes, 3060 Burgundy Trail|Post Falls|ID|83854|US
Phone Number:

I710-1
I710-2
I710-3

618325

Response to comment I710-1

See response to Comment No. I351-1.

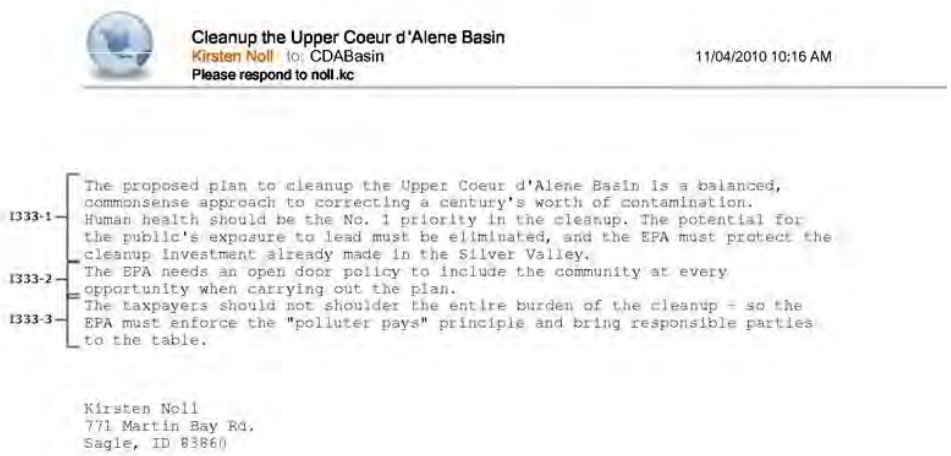
Response to comment I710-2

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I710-3

See response to Comment No. I295-3.

Noll, Kristen, I333, Letter 614463



Cleanup the Upper Coeur d'Alene Basin
Kirsten Noll to: CDABasin 11/04/2010 10:16 AM
Please respond to noll.kc

I333-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I333-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I333-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Kirsten Noll
771 Martin Bay Rd.
Sagle, ID 83860

614463

Response to comment I333-1

See response to Comment No. I295-1.

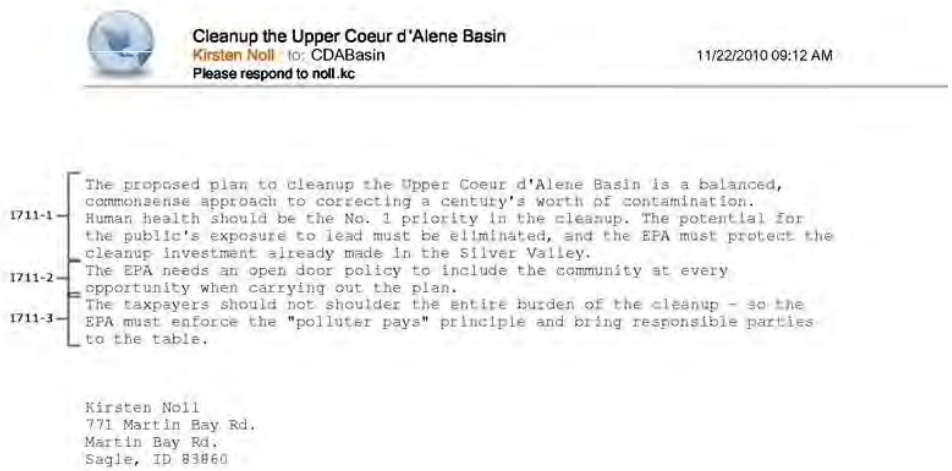
Response to comment I333-2

See response to Comment No. I295-2.

Response to comment I333-3

See response to Comment No. I295-3.

Noll, Kristen, I711, Letter 618326



Cleanup the Upper Coeur d'Alene Basin
Kirsten Noll to: CDABasin 11/22/2010 09:12 AM
Please respond to noll.kc

I711-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be elimnated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I711-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I711-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Kirsten Noll
771 Martin Bay Rd.
Martin Bay Rd.
Sagle, ID 83860

618326

Response to comment I711-1

See response to Comment No. I295-1.

Response to comment I711-2

See response to Comment No. I295-2.

Response to comment I711-3

See response to Comment No. I295-3.

Noordam, Richard, I712, Letter 618327

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
ricknoordam@gmail.com to: formsubmission 11/18/2010 04:26 PM
Sent by: Ricknoordam@Gmail.Com <ricknoordam=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Richard Noordam
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. I was born and raised in the Silver Valley and the Box proposed is way over sized
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley with limits in size and remediation areas.
I own a home in Mullan and spend weekends there
Coeur d'Alene Basin Resident: Yes
Email Address: ricknoordam@gmail.com
Mailing Address: 1219 Compton|Post Falls|Idaho|84854|US
Phone Number: (208) 699-2993

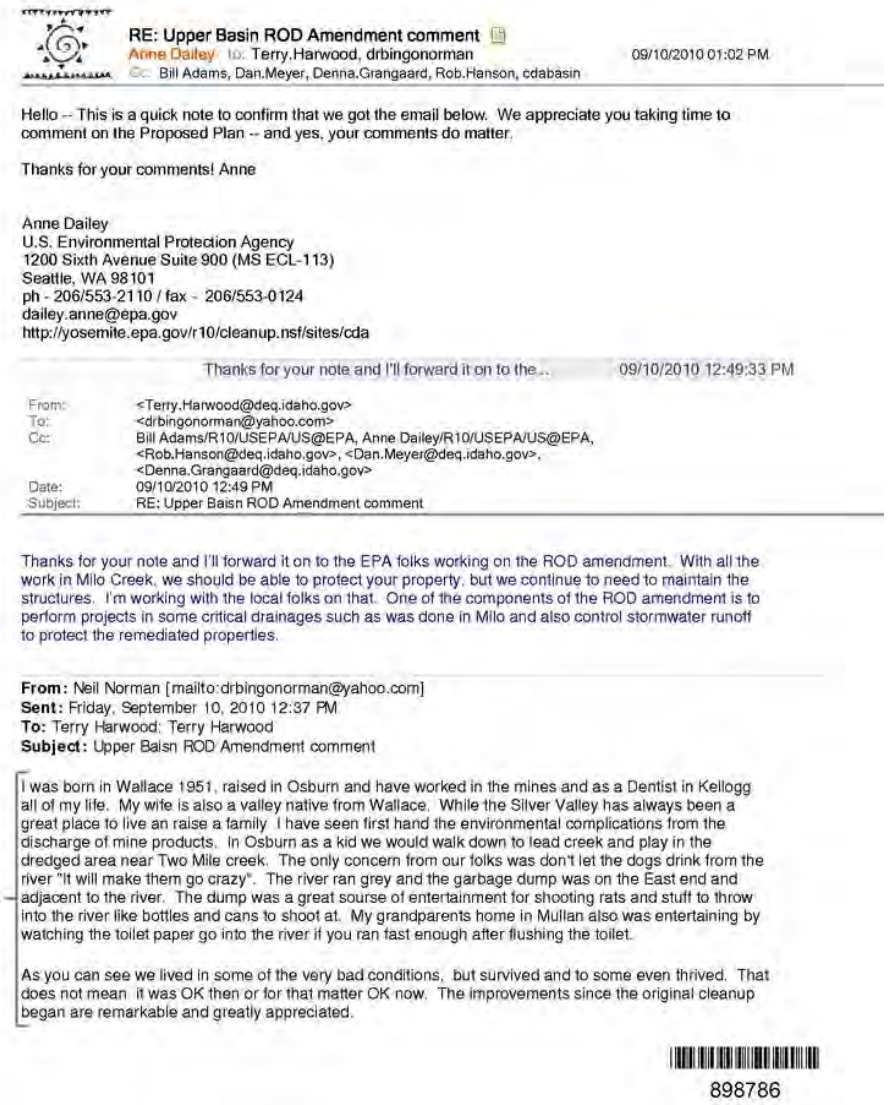
I712-1

618327

Response to comment I712-1

See response to Comment No. I351-1.

Norman, Neil, I447, Letter 898786



RE: Upper Basin ROD Amendment comment
Anne Dailey To: Terry.Harwood, drbingonorman 09/10/2010 01:02 PM
Cc: Bill Adams, Dan.Meyer, Denna.Grangaard, Rob.Hanson, cdabasin

Hello -- This is a quick note to confirm that we got the email below. We appreciate you taking time to comment on the Proposed Plan -- and yes, your comments do matter.

Thanks for your comments! Anne

Anne Dailey
U.S. Environmental Protection Agency
1200 Sixth Avenue Suite 900 (MS ECL-113)
Seattle, WA 98101
ph - 206/553-2110 / fax - 206/553-0124
dailey.anne@epa.gov
http://yosemite.epa.gov/r10/cleanup.nsf/sites/cda

Thanks for your note and I'll forward it on to the... 09/10/2010 12:49:33 PM

From: <Terry.Harwood@deq.idaho.gov>
To: <drbingonorman@yahoo.com>
Cc: Bill Adams/R10/USEPA/US@EPA, Anne Dailey/R10/USEPA/US@EPA, <Rob.Hanson@deq.idaho.gov>, <Dan.Meyer@deq.idaho.gov>, <Denna.Grangaard@deq.idaho.gov>
Date: 09/10/2010 12:49 PM
Subject: RE: Upper Baisn ROD Amendment comment

Thanks for your note and I'll forward it on to the EPA folks working on the ROD amendment. With all the work in Milo Creek, we should be able to protect your property, but we continue to need to maintain the structures. I'm working with the local folks on that. One of the components of the ROD amendment is to perform projects in some critical drainages such as was done in Milo and also control stormwater runoff to protect the remediated properties.

From: Neil Norman [mailto:drbingonorman@yahoo.com]
Sent: Friday, September 10, 2010 12:37 PM
To: Terry Harwood; Terry Harwood
Subject: Upper Baisn ROD Amendment comment

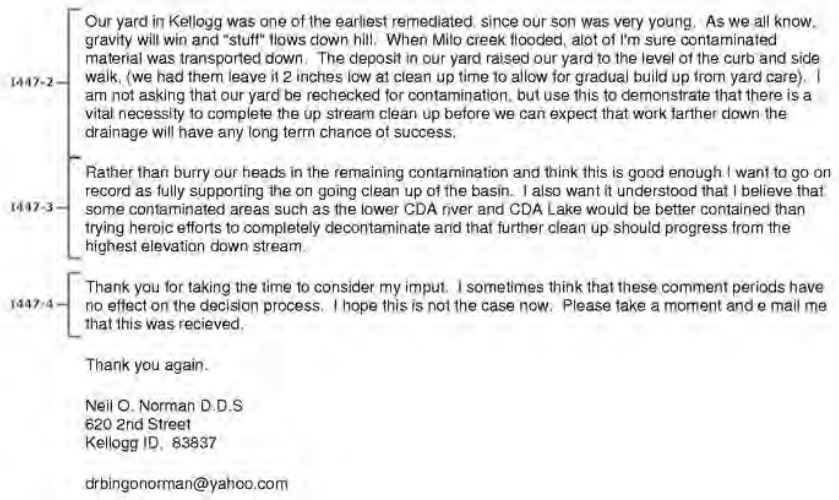
1447-1 I was born in Wallace 1951, raised in Osburn and have worked in the mines and as a Dentist in Kellogg all of my life. My wife is also a valley native from Wallace. While the Silver Valley has always been a great place to live an raise a family I have seen first hand the environmental complications from the discharge of mine products. In Osburn as a kid we would walk down to lead creek and play in the dredged area near Two Mile creek. The only concern from our folks was don't let the dogs drink from the river "It will make them go crazy". The river ran grey and the garbage dump was on the East end and adjacent to the river. The dump was a great sourse of entertainment for shooting rats and stuff to throw into the river like bottles and cans to shoot at. My grandparents home in Mullan also was entertaining by watching the toilet paper go into the river if you ran fast enough after flushing the toilet.

As you can see we lived in some of the very bad conditions, but survived and to some even thrived. That does not mean it was OK then or for that matter OK now. The improvements since the original cleanup began are remarkable and greatly appreciated.

898786

Response to comment I447-1

Thank you for your comment.



I447-2 Our yard in Kellogg was one of the earliest remediated. since our son was very young. As we all know, gravity will win and "stuff" flows down hill. When Milo creek flooded, alot of I'm sure contaminated material was transported down. The deposit in our yard raised our yard to the level of the curb and side walk, (we had them leave it 2 inches low at clean up time to allow for gradual build up from yard care). I am not asking that our yard be rechecked for contamination, but use this to demonstrate that there is a vital necessity to complete the up stream clean up before we can expect that work farther down the drainage will have any long term chance of success.

I447-3 Rather than burry our heads in the remaining contamination and think this is good enough I want to go on record as fully supporting the on going clean up of the basin. I also want it understood that I believe that some contaminated areas such as the lower CDA river and CDA Lake would be better contained than trying heroic efforts to completely decontaminate and that further clean up should progress from the highest elevation down stream.

I447-4 Thank you for taking the time to consider my imput. I sometimes think that these comment periods have no effect on the decision process. I hope this is not the case now. Please take a moment and e mail me that this was recieved.

Thank you again.

Neil O. Norman D.D.S
620 2nd Street
Kellogg ID, 83837

drbingonorman@yahoo.com

Response to comment I447-2

See response to Comment No. I54-5. The Selected Remedy includes remedy protection actions to protect remediated properties from SFCDR tributary stormwater runoff. These actions will help protect areas that have been cleaned up, keeping clean areas clean, which is a commonsense goal. Remedy protection includes actions such as local drainage controls to ensure that clean gravel or soil barriers are not washed away or recontaminated during heavy rain or snow events or by tributary flooding.

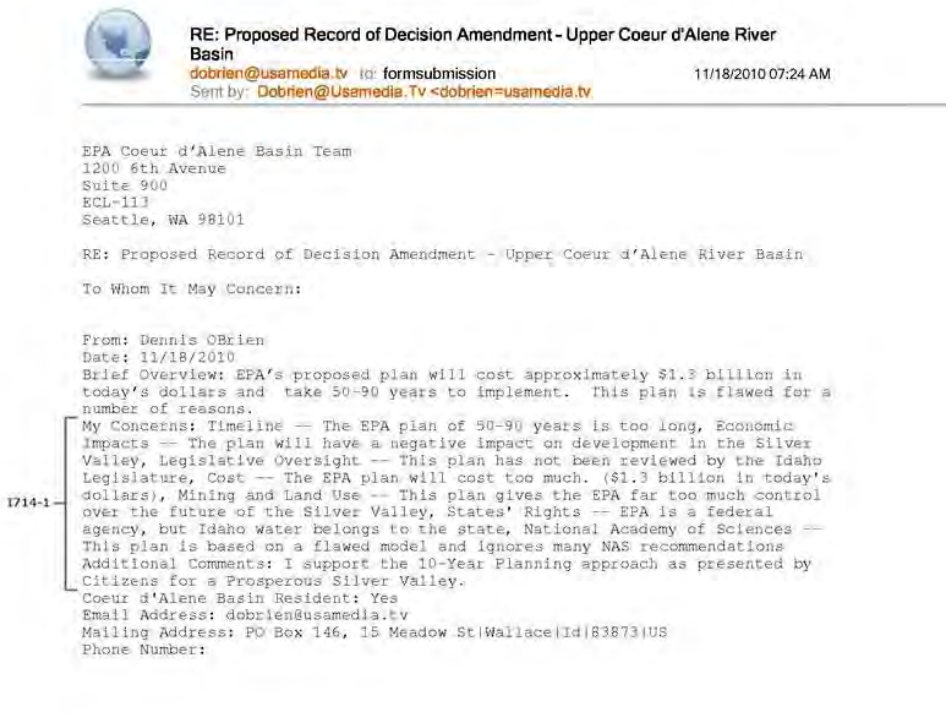
Response to comment I447-3

Comment noted. Although the Lower Basin is not included in the Selected Remedy, actions in the Upper Basin are expected to improve water quality and reduce the movement of contaminated sediments downstream in the Lower Basin. Thus, the Upper Basin cleanup is expected to complement cleanup activities in the Lower Basin by reducing the flow of contaminated materials and reducing the potential for recontamination from the Upper Basin to the Lower Basin. EPA continues to pursue data collection and analysis in the Lower Basin to support the future development and evaluation of remedial alternatives for the Lower Basin.

Response to comment I447-4

Thank you for your comment. EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin.

O'Brien, Dennis, I714, Letter 618329



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
dobrien@usamedia.tv to: formsubmission 11/18/2010 07:24 AM
Sent by: Dobrien@Usamedia.Tv <dobrien=usamedia.tv

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Dennis OBrien
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I714-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: dobrien@usamedia.tv
Mailing Address: PO Box 146, 15 Meadow St|Wallace|Id|83873|US
Phone Number:

618329

Response to comment I714-1

See response to Comment No. I351-1.

O'Brien, Jack, I713, Letter 618328

Comments On EPA's Proposed Cleanup Plan
Jack O'Brien
to:
CDABasin
11/20/2010 10:28 AM
Show Details

11/20/10

Hi Folks:

I713-1 Here are my musings about your Proposed Cleanup Plan for the Upper Coeur d'Alene Basin.

Initially focusing on the upper portion of the Basin is logical because it should minimize the continual spread of mining-related waste downstream.

I713-2 Using the Central Treatment Plant in Kellogg to treat contaminated water before it enters streams and rivers seems like a very cost-effective way to address enhancing water quality.

I713-3 The Federal government should do all it can to enforce the "polluter pays" principle so taxpayers don't have to cover all cleanup costs.

I713-4 The Proposed Plan seems like a balanced, commonsense approach to correcting the extensive damage left from decades of mining-related activity in the Basin.

I713-5 In spite of a seemingly never ending barrage of mainly unjustified criticism from local and State of Idaho officials (which is still occurring even now) your agency has done a commendable job of slowly, but surely cleaning things up in the Coeur d'Alene Basin. Thanks for your dedication and perseverance.

Jack O'Brien
2205 W. Medoc Ct.
Hayden, ID 83835

P.S. Thanks for keeping me well informed of your cleanup activities all these years.

618328

Response to comment I713-1
Thank you for your comment.

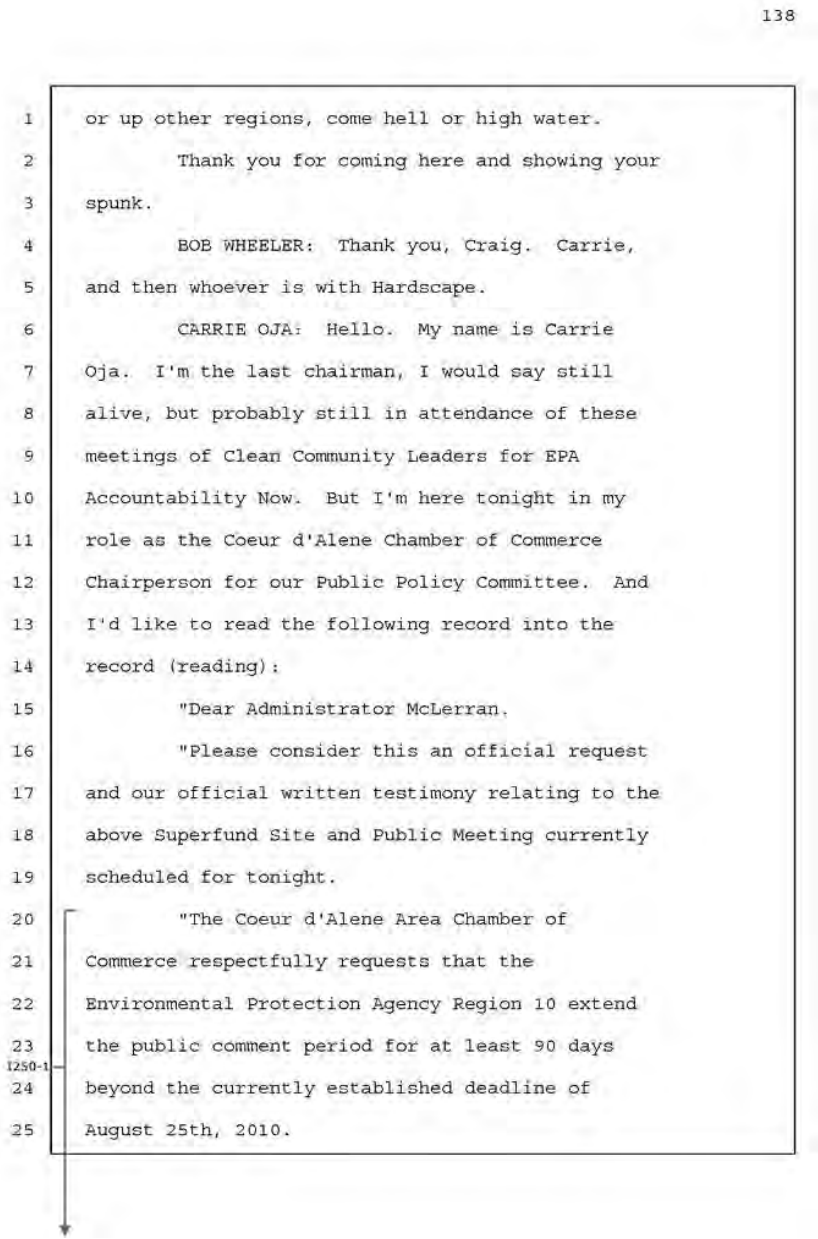
Response to comment I713-2
Thank you for your comment.

Response to comment I713-3
See response to Comment No. I295-3.

Response to comment I713-4
Comment noted and appreciated.

Response to comment I713-5
Thank you for your comment.

Oja, Carrie, I250, Letter 610097-45



138

or up other regions, come hell or high water.

Thank you for coming here and showing your spunk.

BOB WHEELER: Thank you, Craig. Carrie, and then whoever is with Hardscape.

CARRIE OJA: Hello. My name is Carrie Oja. I'm the last chairman, I would say still alive, but probably still in attendance of these meetings of Clean Community Leaders for EPA Accountability Now. But I'm here tonight in my role as the Coeur d'Alene Chamber of Commerce Chairperson for our Public Policy Committee. And I'd like to read the following record into the record (reading):

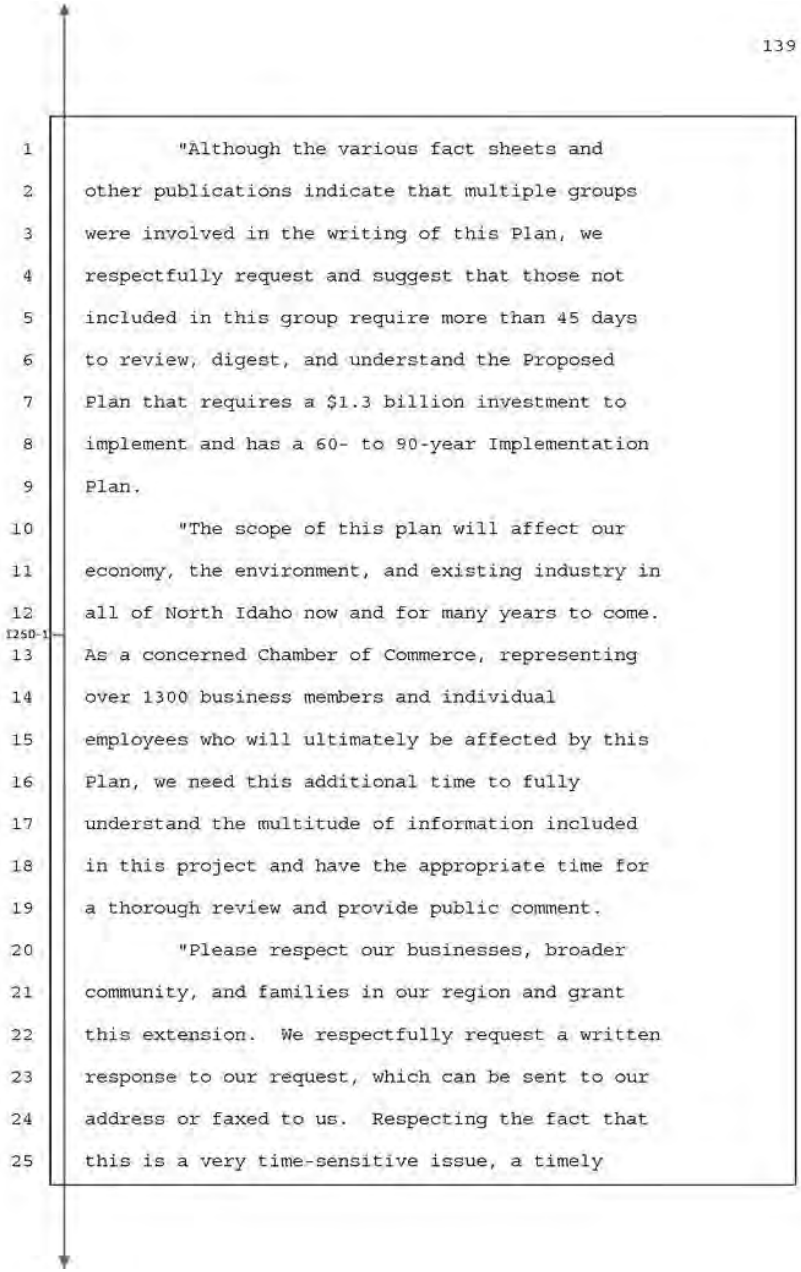
"Dear Administrator McLerran.

"Please consider this an official request and our official written testimony relating to the above Superfund Site and Public Meeting currently scheduled for tonight.

"The Coeur d'Alene Area Chamber of Commerce respectfully requests that the Environmental Protection Agency Region 10 extend the public comment period for at least 90 days beyond the currently established deadline of August 25th, 2010. I250-1

Response to comment I250-1

See responses to Comment Nos. I58-1, I58-2, and I54-6.



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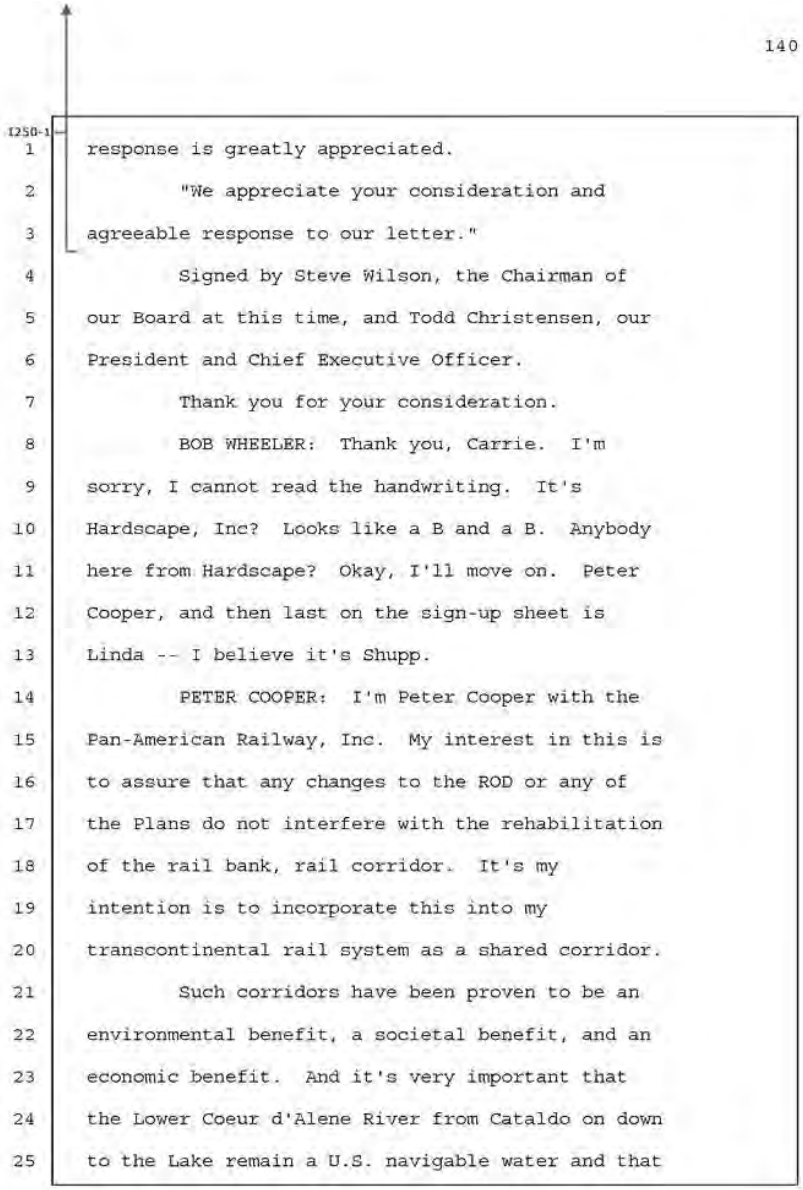
"Although the various fact sheets and other publications indicate that multiple groups were involved in the writing of this Plan, we respectfully request and suggest that those not included in this group require more than 45 days to review, digest, and understand the Proposed Plan that requires a $1.3 billion investment to implement and has a 60- to 90-year Implementation Plan.

"The scope of this plan will affect our economy, the environment, and existing industry in all of North Idaho now and for many years to come. As a concerned Chamber of Commerce, representing over 1300 business members and individual employees who will ultimately be affected by this Plan, we need this additional time to fully understand the multitude of information included in this project and have the appropriate time for a thorough review and provide public comment.

"Please respect our businesses, broader community, and families in our region and grant this extension. We respectfully request a written response to our request, which can be sent to our address or faxed to us. Respecting the fact that this is a very time-sensitive issue, a timely

I250-1

No comments



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I250-1

response is greatly appreciated.

"We appreciate your consideration and agreeable response to our letter."

Signed by Steve Wilson, the Chairman of our Board at this time, and Todd Christensen, our President and Chief Executive Officer.

Thank you for your consideration.

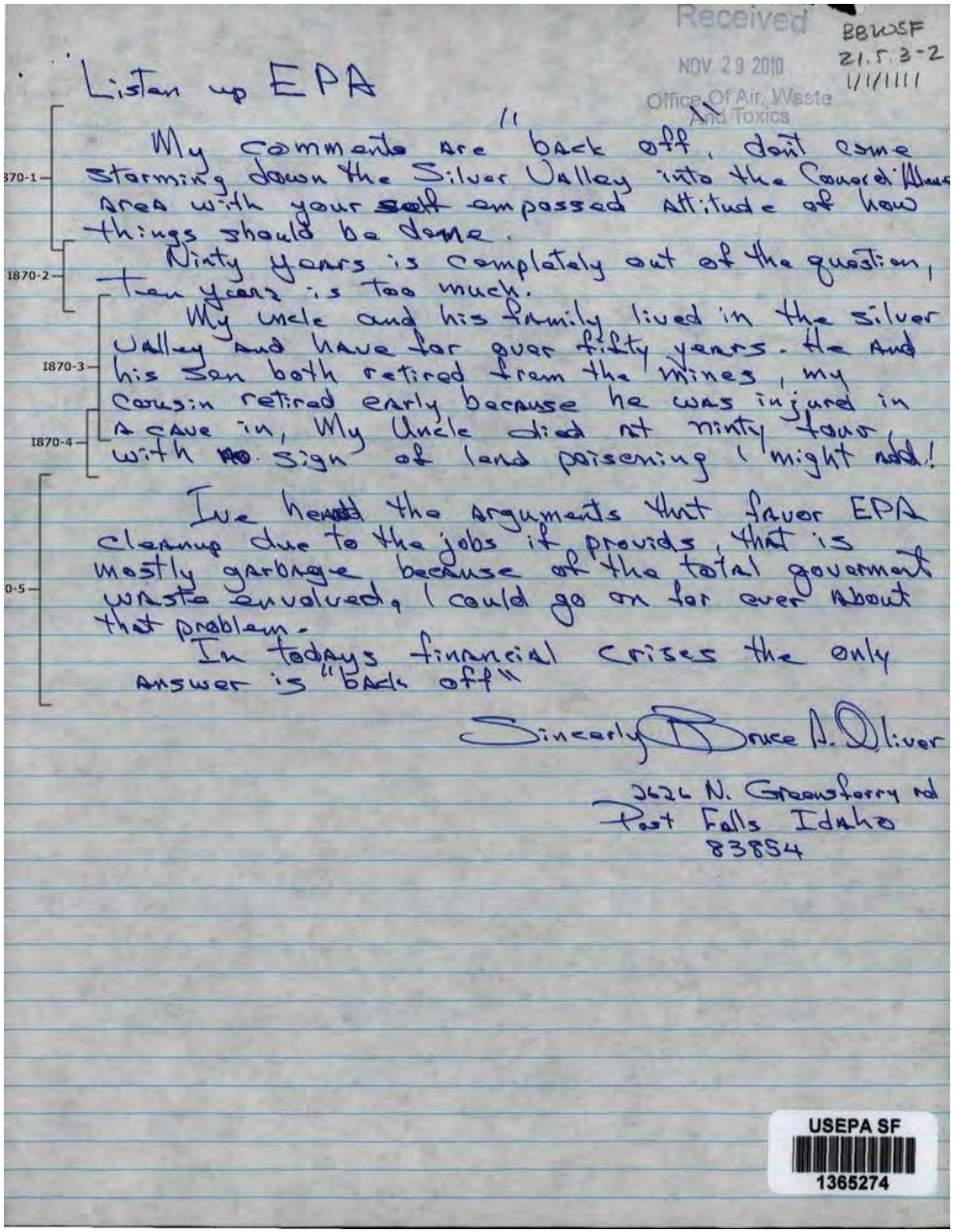
BOB WHEELER: Thank you, Carrie. I'm sorry, I cannot read the handwriting. It's Hardscape, Inc? Looks like a B and a B. Anybody here from Hardscape? Okay, I'll move on. Peter Cooper, and then last on the sign-up sheet is Linda -- I believe it's Shupp.

PETER COOPER: I'm Peter Cooper with the Pan-American Railway, Inc. My interest in this is to assure that any changes to the ROD or any of the Plans do not interfere with the rehabilitation of the rail bank, rail corridor. It's my intention is to incorporate this into my transcontinental rail system as a shared corridor.

Such corridors have been proven to be an environmental benefit, a societal benefit, and an economic benefit. And it's very important that the Lower Coeur d'Alene River from Cataldo on down to the Lake remain a U.S. navigable water and that

No comments

Oliver, Bruce A., I870, Letter 1365274



Received
NOV 29 2010
Office Of Air, Waste And Toxics

BBWSF
21.5.3-2
1/1/1111

Listen up EPA

I870-1 My commants Are back off, dont come storming down the Silver Valley into the Coeur d'Alene Area with your ~~self~~ empassed Attitude of how things should be done.

I870-2 Ninty years is completely out of the question, ten years is too much.

I870-3 My uncle and his family lived in the silver Valley and have for over fifty years. He And his son both retired from the mines, my cousin retired early because he was injured in a cave in, My Uncle died at ninty four, with ~~no~~ sign of lead poisening I might add!

I870-4

I870-5 Ive heard the arguments that favor EPA clean up due to the jobs it provids, that is mostly garbage because of the total goverment waste envolved, I could go on for ever About that problem.

In todays financial crises the only Answer is "back off"

Sincerly Bruce A. Oliver

3626 N. Greenferry rd
Post Falls Idaho
83854

USEPA SF
1365274

Response to comment I870-1
Comment noted.

Response to comment I870-2
See response to Comment No. I58-1.

Response to comment I870-3
Comment noted.

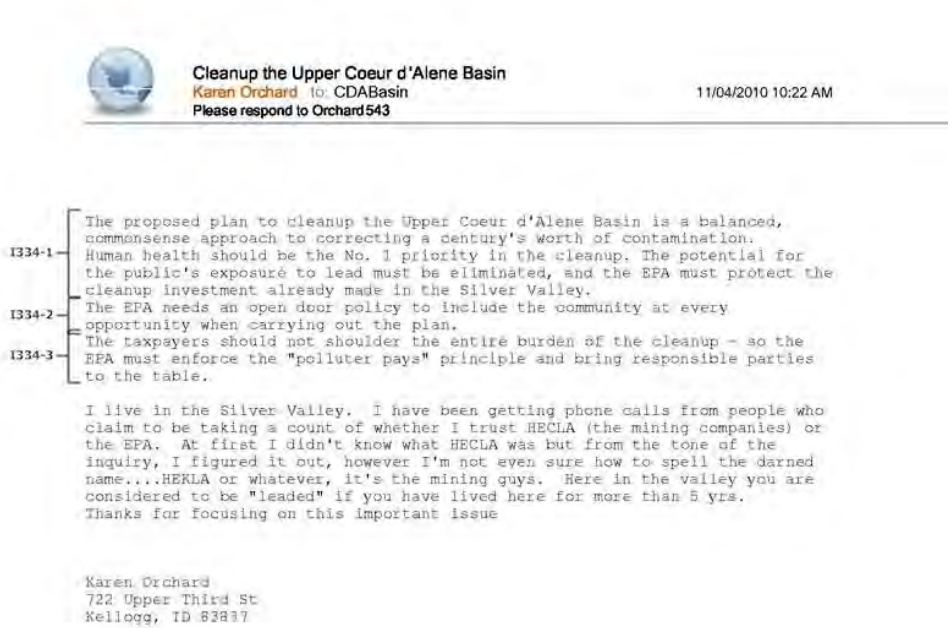
Response to comment I870-4
See response to Comment No. I295-1.

Response to comment I870-5
Comment noted.

SHOSHONE COUNTY, IDAHO
A Mining, Lumbering and Recreational Empire
Prichard
Murray
KELLOGG
90
Smeltarville
Osburn
Wardner
MULLAN
WALLACE
St. Joe River
Avery

No comments

Orchard, Karen, I334, Letter 614464



Cleanup the Upper Coeur d'Alene Basin
Karen Orchard to: CDABasin 11/04/2010 10:22 AM
Please respond to Orchard543

I334-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I334-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I334-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

I live in the Silver Valley. I have been getting phone calls from people who claim to be taking a count of whether I trust HECLA (the mining companies) or the EPA. At first I didn't know what HECLA was but from the tone of the inquiry, I figured it out, however I'm not even sure how to spell the darned name....HEKLA or whatever, it's the mining guys. Here in the valley you are considered to be "leaded" if you have lived here for more than 5 yrs. Thanks for focusing on this important issue

Karen Orchard
722 Upper Third St
Kellogg, ID 83837

614464

Response to comment I334-1

See response to Comment No. I295-1.

Response to comment I334-2

See response to Comment No. I295-2.

Response to comment I334-3

See response to Comment No. I295-3.

Ortmann, Allan, I715, Letter 618330

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
alsuedox@gmail.com to: formsubmission 11/18/2010 07:42 PM
Sent by: Alsuedox@Gmail.Com <alsuedox=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Allen Ortmann
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. It totally ignores the impute and concerns of the people that live in this area. The only reason I can see that the EPA wants to do this is to justify its existence by making mountains out of mole hills. We do not need nor want this much invasion into our state. There is absolutely no health justification for their plan.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. The people that actually live, play and work here should have more say than bureaucrates needing to justify their exsistence.
Coeur d'Alene Basin Resident: Yes
Email Address: alsuedox@gmail.com
Mailing Address: 2023 N 12th St|Coeur d'Alene|ID|83814|US
Phone Number: (208) 676-1997

I715-1

I715-2

618330

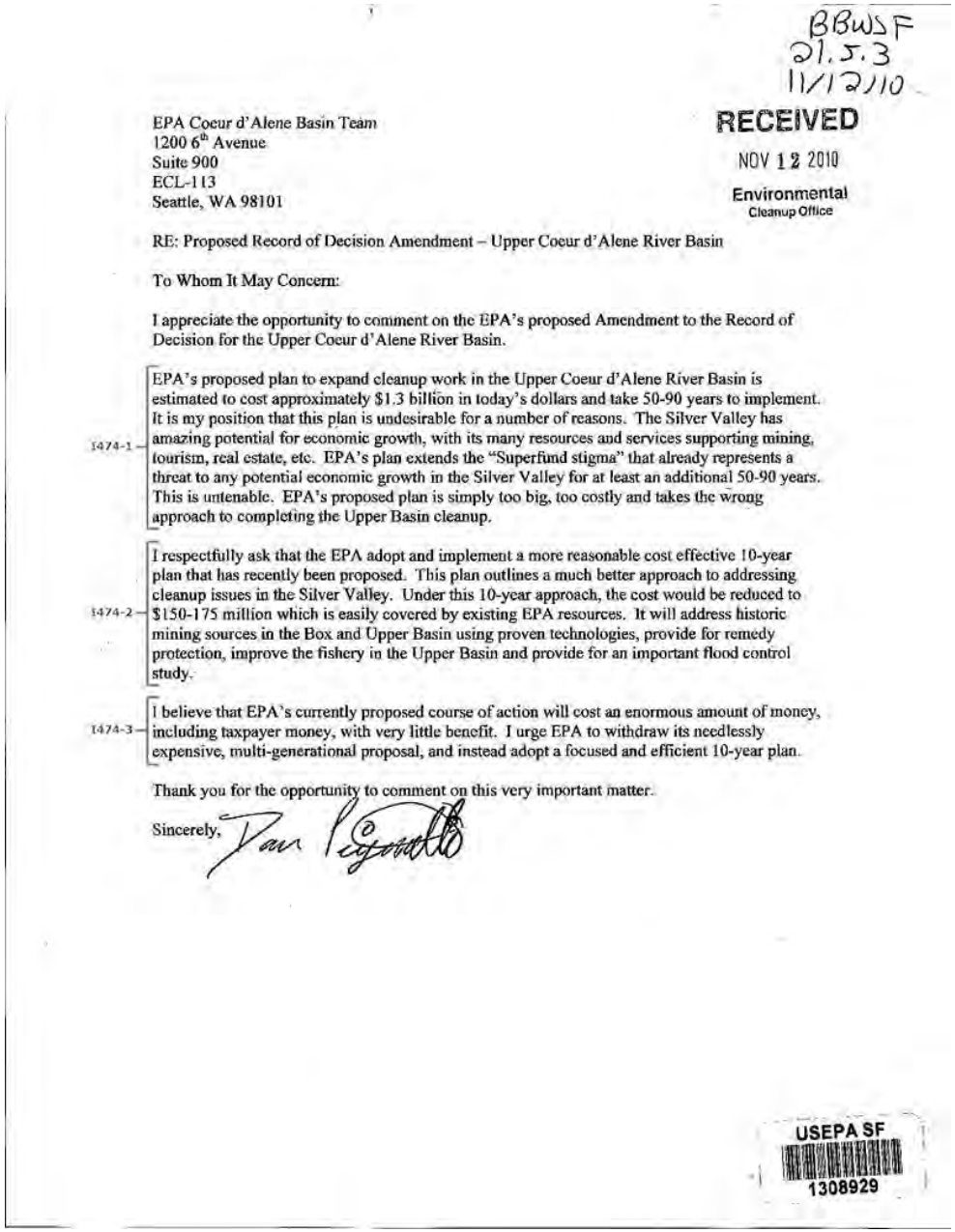
Response to comment I715-1

See response to Comment No. I351-1.

Response to comment I715-2

See response to Comment No. I295-2.

P, Dan, I474, Letter 1308929



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21.5.3
11/12/10

RECEIVED
NOV 12 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I474-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I474-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I474-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Dan Pegram

USEPA SF
1308929

Response to comment I474-1

EPA agrees that the Silver Valley has great potential for economic growth. EPA believes that the cleanup will benefit the local economy in a variety of ways. The Selected Remedy will boost economic growth by significantly improving the environment for residents and tourists, creating jobs with the money that will be spent on the Upper Basin cleanup, and providing opportunities for formerly contaminated land to be redeveloped. Retail development in Smelterville, the Galena Ridge golf community, and the Trail of the Coeur d'Alenes are examples of the types of redevelopment that can occur on remediated properties.

Since 1985, millions of dollars have been spent on cleanup, primarily for yard remediation and cleanup in the Bunker Hill Box. Significant spending will continue for the cleanup actions in the Upper Basin. EPA encourages the hiring of local businesses and workforce for the cleanup work. To that end EPA is providing training opportunities, through the Superfund Job Training Initiative, for local citizens in order to successfully compete for these jobs.

Cleanup of additional properties in the Silver Valley will provide opportunities for development that do not currently exist. EPA is committed to working with the mining industry and Silver Valley businesses and landowners to conduct the cleanup in ways that are consistent with the current and future land uses desired by the community. Throughout the cleanup, there will be opportunities for the public to provide input on implementation planning through the established Basin Environmental Improvement Project Commission process.

The Upper Basin Selected Remedy is an interim remedy which identifies the priority remedial actions that are expected to provide the greatest reduction of contamination in the SFCDR and its tributaries and protection of in-place human health barriers in local communities. EPA's goal is to complete cleanup in the Upper Basin as quickly as possible and with minimum disruption. Most of the cleanup work will be in the areas of greatest contamination which are generally in less populated areas higher in stream drainages. Implementation of the Selected Remedy is expected to take about 30years rather than the estimated 50-90 years for the Preferred Alternative in the Proposed Plan.

How long it takes to implement the Selected Remedy will ultimately depend upon the annual funding rate, the ability to work in multiple areas simultaneously, the overall pace of cleanup, and how well the environmental system responds to cleanup actions. As the cleanup progresses, EPA will routinely look for opportunities to speed up cleanup activities while identifying locations where no further or more limited action is required. Using the adaptive management process, EPA will also continually evaluate the effectiveness of the cleanup actions, as well as the need for additional actions.

Response to comment I474-2

Under the Superfund law, EPA has a responsibility and the authority to take actions to protect human health and the environment. EPA's decision-making process has been a careful, National Oil and Hazardous Substances Pollution Contingency Plan-consistent, and collaborative effort which included input from state and local governments, tribes, other federal agencies, the Basin Commission, and the public. EPA has listened and responded to comments received on the Proposed Plan to reduce the scope of the Selected Remedy. The total estimated cost of the Selected Remedy as presented in the ROD Amendment is $635 million. Implementation of the Selected Remedy is expected to take about 30 years.

EPA does not believe that Hecla's 10-Year Plan would be comprehensive enough to protect human health and the environment throughout the Upper Basin. Most of the sites identified in Hecla's 10-Year Plan are also priority sites in EPA's Selected Remedy. However, the actions included in Hecla's 10-Year Plan only address a fraction of the contamination that needs to be and is addressed under EPA's Selected Remedy. Hecla's 10-Year Plan also relies heavily on less protective remedial actions such as "toe pull-back" (moving the base of waste piles away from creeks and the SFCDR), regrading, soil capping, and revegetation. Furthermore, elements of Hecla's 10-Year Plan may not be technically feasible. For example, the plan calls for contaminated adit and seep discharges to be collected and treated at lagoon-type systems which, as proposed, have serious technical flaws and are not likely possible to implement.

In contrast to Hecla's 10-Year Plan, EPA's Selected Remedy is National Oil and Hazardous Substances Pollution Contingency Plan-consistent and identifies effective and proven actions. For example, the remedy includes methods, such as excavation of highly contaminated floodplain sediments and tailings, and groundwater collection and treatment, to address contamination that is inaccessible for removal (such as materials located beneath roads and communities). EPA believes these actions will be more effective in reducing metals loading to the SFCDR and its tributaries, and will more comprehensively protect human health and the environment.

Response to comment I474-3

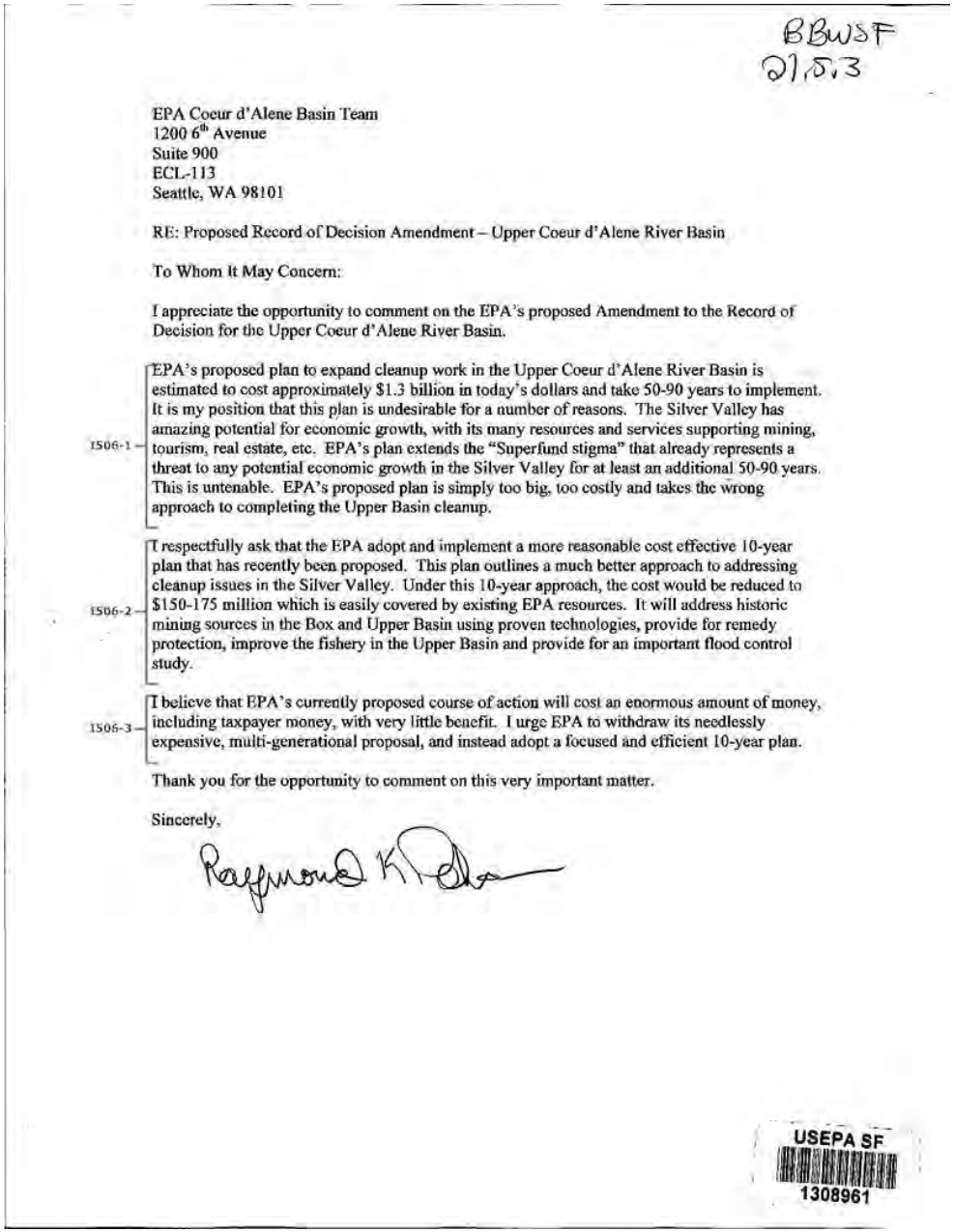
Due in part to extensive public concern about the duration of cleanup, EPA has decided to significantly reduce the scope of the Selected Remedy by prioritizing the remedial actions that were presented as EPA's Preferred Alternative in the Proposed Plan. The Upper Basin Selected Remedy is an interim remedy which identifies the priority remedial actions that are expected to provide the greatest reduction of contamination in the SFCDR and its tributaries and protection of in-place human health barriers in local communities. EPA's goal is to complete cleanup in the Upper Basin as quickly as possible and with minimum disruption. Implementation of the Selected Remedy is expected to take several decades.

How long it takes to implement the Selected Remedy will ultimately depend upon the annual funding rate, the ability to work in multiple areas simultaneously, the overall pace of cleanup, and how well the environmental system responds to cleanup actions. As the cleanup progresses, EPA will routinely look for opportunities to speed up cleanup activities while identifying locations where no further or more limited action is required. Using the adaptive management process, EPA will also continually evaluate the effectiveness of the cleanup actions, as well as the need for additional actions.

EPA will pay for much of the Selected Remedy with funds from legal settlements between mining companies and the federal government. The cleanup will proceed as quickly as possible, recognizing the need to balance speed of cleanup against the desire to grow the funds through interest accumulation, which would fund the maximum amount of cleanup throughout the Upper and Lower Basin. Taxpayer dollars used to fund the cleanup, if any, will augment settlement funds.

See response to Comment No. I474-2 regarding Hecla's proposed 10-Year Plan.

P, Raymond, I506, Letter 1308961



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I506-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I506-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I506-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Raymond K. Pa

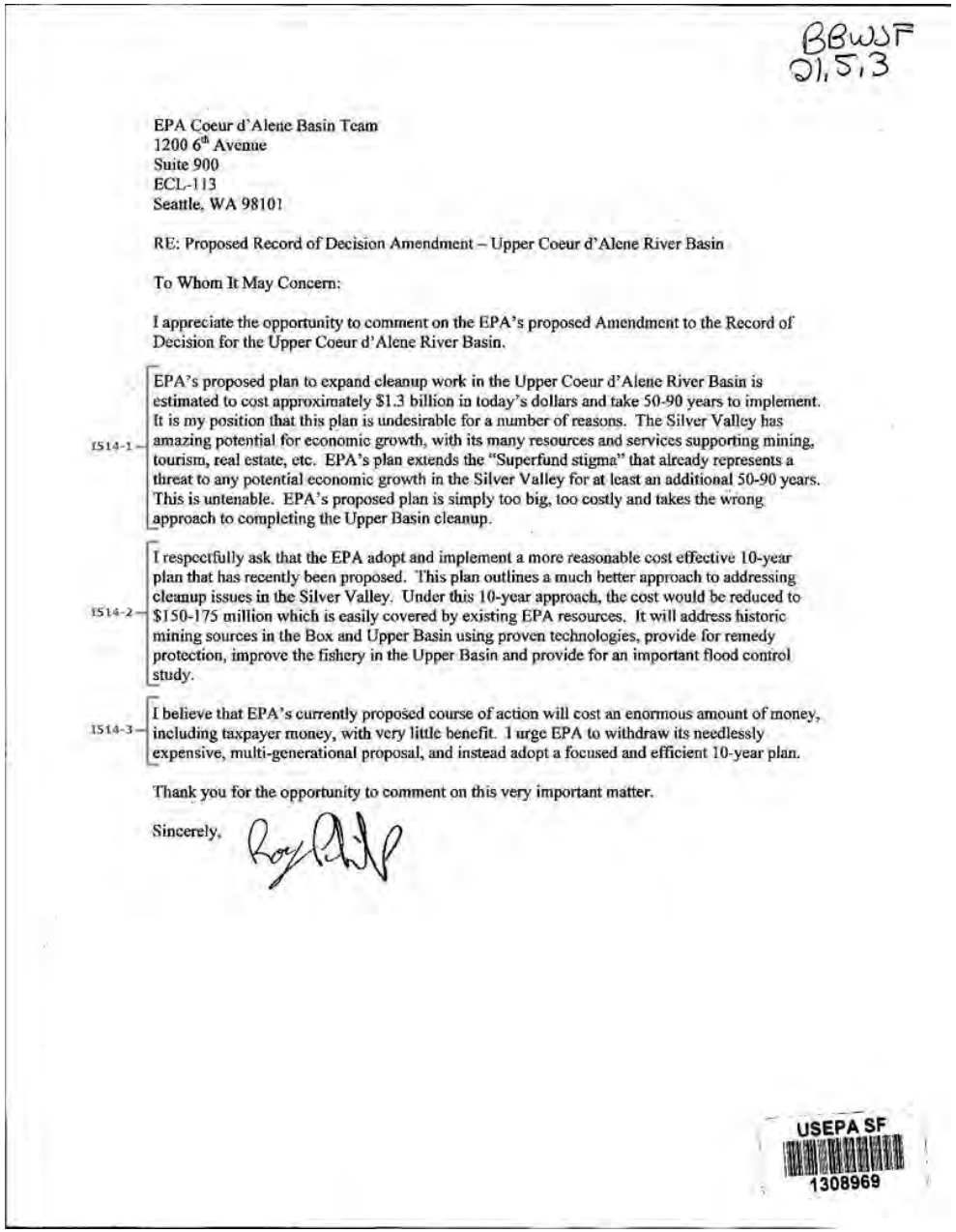
USEPA SF
1308961

Response to comment I506-1
See response to Comment No. I474-1.

Response to comment I506-2
See response to Comment No. I474-2.

Response to comment I506-3
See response to Comment No. I474-3.

P, Roy, I514, Letter 1308969



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I514-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I514-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I514-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Roy

USEPA SF
1308969

Response to comment I514-1

See response to Comment No. I474-1.

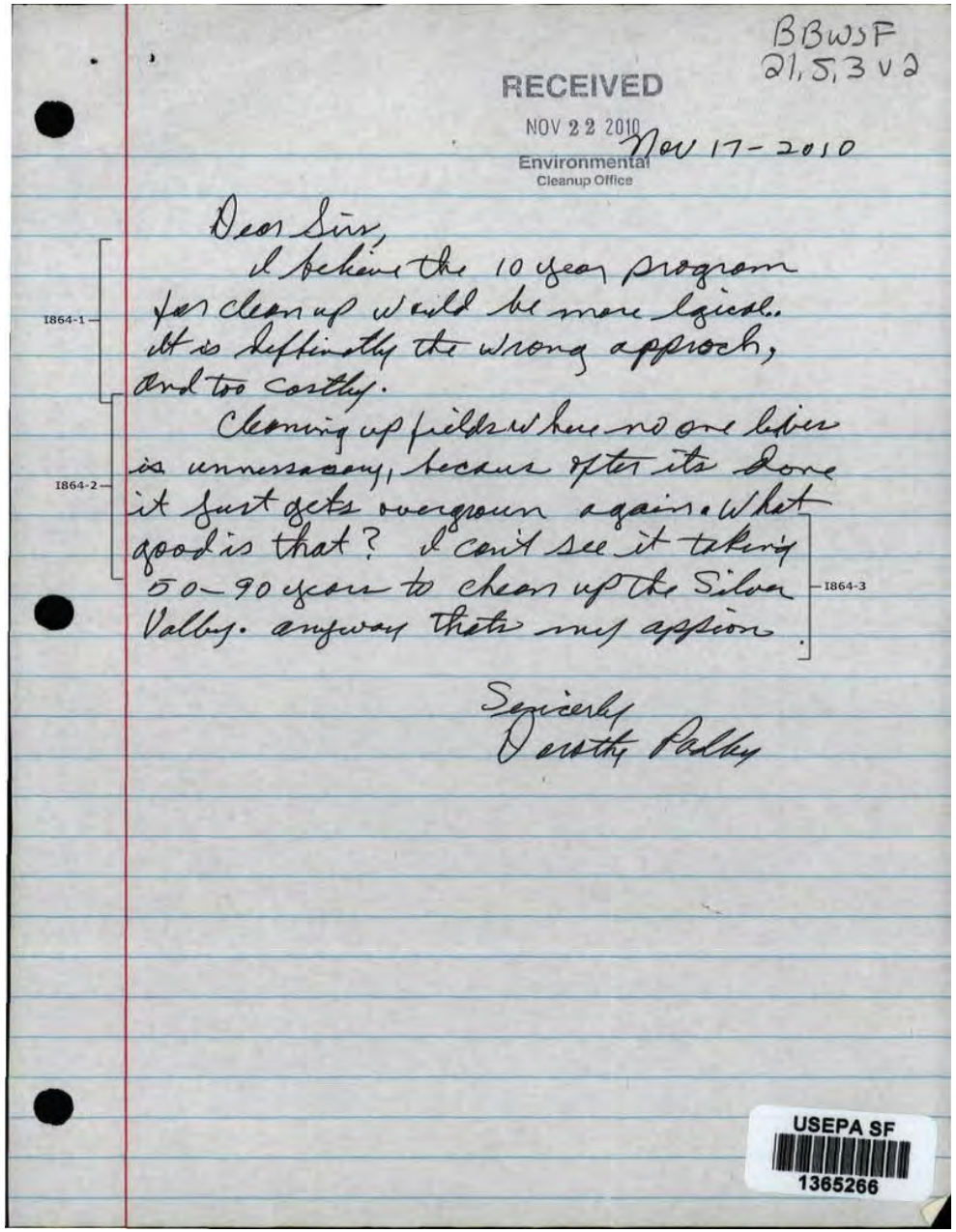
Response to comment I514-2

See response to Comment No. I474-2.

Response to comment I514-3

See response to Comment No. I474-3.

Padley, Dorothy, I864, Letter 1365266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21,5,3 v 2

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NOV 22 2010
Environmental
Cleanup Office

Nov 17-2010

Dear Sirs,

I beleive the 10 year program for clean up would be more logical. It is definatly the wrong approch, and too costly.

I864-1

Cleaning up fields where no one lives is unnessacary, because after its done it just gets overgrown again. What good is that? I can't see it taking 50-90 years to clean up the Silver Valley. anyway thats my opinion.

I864-2

I864-3

Sincerely
Dorothy Padley

USEPA SF
1365266

Response to comment I864-1

See response to Comment No. I474-2.

Response to comment I864-2

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. As described in the response to Comment No. I295-2, EPA developed the Selected Remedy in a collaborative process with a wide variety of public involvement. See response to Comment No. I521-8.

Response to comment I864-3

Thank you for your comment. See response to Comment No. I58-1.

Paine Hamblen, LLP, I556, Letter 617555

CdA Basin ROD Amendment
Jerry K. Boyd
to:
CDABasin
11/23/2010 04:56 PM
Show Details

This is a general comments for consideration regarding the ROD Amendment for the CdA Basin.

I556-1 — CERCLA Section 101(23) defines "remedy" or "remedial action." As I understand the facts, the ROD Amendment will constitute "remedial action." Remedial action means "those actions consistent with permanent remedy taken . . . to prevent or minimize the release of hazardous substances so that they do not migrate to cause substantial danger to present or future public health or welfare or the environment." The definition goes on to broadly describe actions that may be taken. The CERCLA definition of "remedy" or "remedial action" is not all inclusive.

I556-2 — The ROD Amendment/Plan should include actions to be taken to protect the remedy already put in place. I believe the definition of "remedial action" is broad enough to include levees and other infra-structure repairs or replacements if such action is necessary to protect the remedy and make the remedy "permanent."

Jerry K Boyd
Paine Hamblen LLP
717 W. Sprague Ave. Suite 1200
Spokane, WA 99201-3505
Direct Dial (509) 455-6039
FAX (509) 838-0007
jerry.boyd@painehamblen.com

617555

Response to comment I556-1

Comment noted. The Selected Remedy, an interim action, is described in the ROD Amendment, Part 2, Section 12, and the response actions identified in the Selected Remedy fit within CERCLA's definition of "remedial action."

Response to comment I556-2

See responses to Comment Nos. I54-5 and LJ36-3.

Pallante, Bruce, I411, Letter 616313

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
be.pall@hotmail.com to: formsubmission 11/09/2010 06:35 PM
Sent by: Be.Pall@Hotmail.Com <be.pall=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Bruce Pallante
Date: 11/08/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I411-1 When one looks at the cost/benifit of the EPA plan it can not be justified.

I411-2 You can gain 90% or more of the cleanup in 10 years for a small fraction of the EPA's proposed cost. The track record of CERCLA cleanups is poor with little clean up and enormous costs, which largely go to the oversaigtht agencies. Unfortunately this has the appearance and reality of jobs in perpetuity for government workers and offers little for the community or environment in a timely manor.

Idaho water issue should clearly be manged by the State, not EPA.

I411-3 The EPA plan falls far short of good science or fiscal responsibility.

I411-4 EPA's plan focuses on drinking water standards which are not the issue. The issue is at what point should water standards be applied and what standards. Site specific standards have been used throughout the U.S. and the point of measurement is relevant. Just as one would not monitor air standards at the tailpipe of a car, one would not impose or monitor water standards inappropriately in locations that defy common sense.

I411-5 The time is long overdue for EPA to listen to the people in the communities and states and work with then rather than trying to govern and subrigate local and state people and agencies.

The U.S. is regulating itself to a third world status because of overly zelous idealists and regulators who have become drunk with power because the people of this great nation have allowed it. One must look at every dollar spent and perform realistic cost/benifit analysis as well as realistic health and environmental risks. Drinking water standards are not the universal standard to be applied in every situation. I411-6

I411-7 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 milllon will

616313

Response to comment I411-1

As described in the ROD Amendment, Part 2, Section 13.0, EPA has determined that the Selected Remedy is cost effective.

Response to comment I411-2

See response to Comment No. I58-1.

Response to comment I411-3

Comment noted. EPA has made significant changes to Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. For additional detail see the ROD Amendment, Part 2, Section 14.0.

Response to comment I411-4

EPA has not focused this Selected Remedy on drinking water. The focus of the remedial actions is to achieve the applicable or relevant and appropriate requirements (ARARs) for surface water. In the case of the SFCDR, the ARARs that will protect the environment are the site-specific ambient water quality criteria (AWQC), which were developed by the State of Idaho to protect aquatic life. The water quality standards to protect the environment are more stringent than drinking water standards (i.e., maximum contaminant levels) for contaminants of concern in the Basin. There is one exception, mercury, as it has not been found to be prevalent in the Upper Basin. EPA is simply stating that by achieving the AWQC through the proposed water treatment actions, the surface water in the SFCDR will also meet drinking water standards. Water treatment is a key part of this remedy because it (1) addresses subsurface materials too deep or impractical to be removed, (2) generally provides a high degree of metals load reduction for a relatively low cost, and (3) provides immediate improvements to surface water quality.

Response to comment I411-5

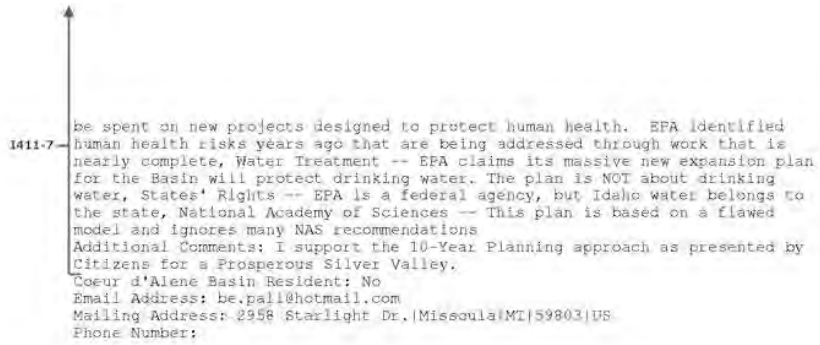
See response to Comment No. I295-2 and the ROD Amendment, Part 2, Section 3.0 regarding EPA's efforts to involve the community in the decisionmaking process.

Response to comment I411-6

Comment noted.

Response to comment I411-7

See response to Comment No. I351-1.



I411-7 be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: be.pall@hotmail.com
Mailing Address: 2958 Starlight Dr.|Missoula|MT|59803|US
Phone Number:

No comments

Panks, Kristen, I717, Letter 618334

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
kpanks2003@yahoo.com to: formsubmission 11/18/2010 01:30 PM
Sent by: Kpanks2003@Yahoo.Com <kpanks2003=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Kristen Panks
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: kpanks2003@yahoo.com
Mailing Address: You said address was optional|Post Falls|Idaho|83854|US
Phone Number:

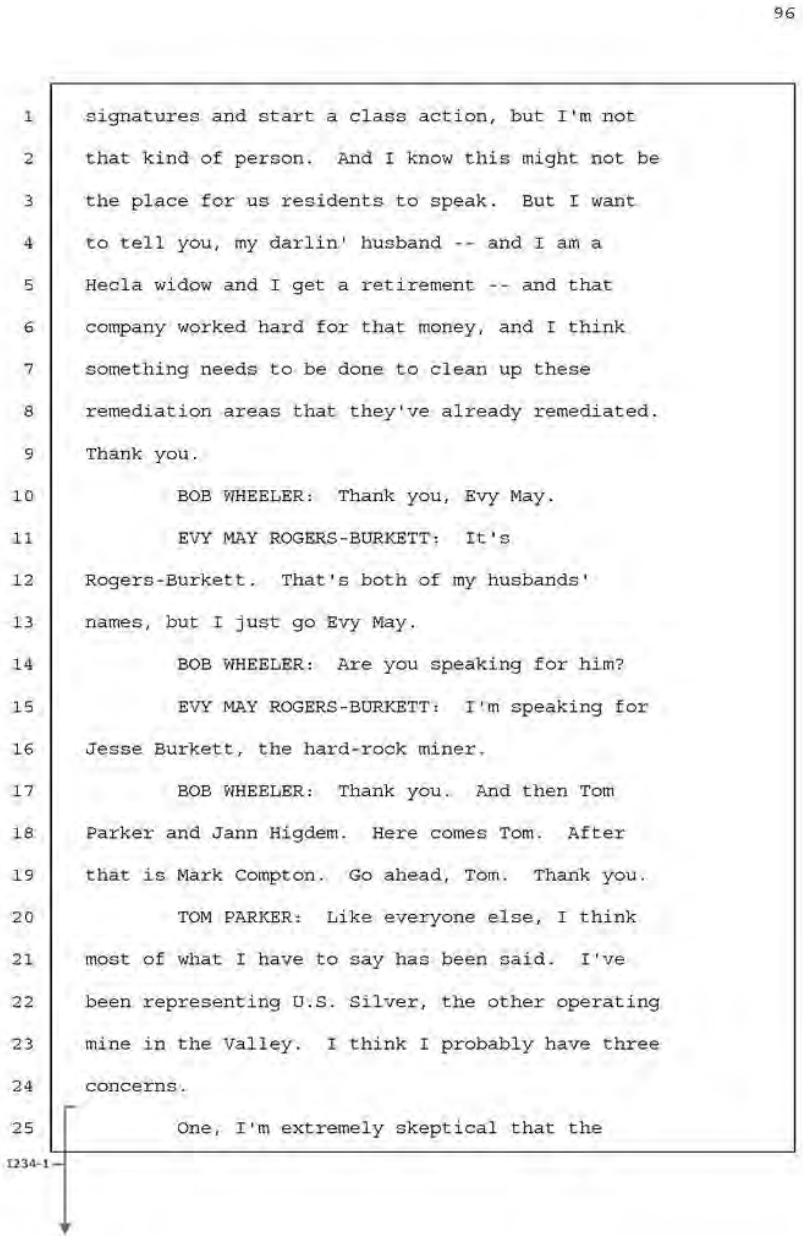
I717-1

618334

Response to comment I717-1

See response to Comment No. I351-1.

Parker, Tom, I234, Letter 610097-29



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signatures and start a class action, but I'm not that kind of person. And I know this might not be the place for us residents to speak. But I want to tell you, my darlin' husband -- and I am a Hecla widow and I get a retirement -- and that company worked hard for that money, and I think something needs to be done to clean up these remediation areas that they've already remediated. Thank you.

BOB WHEELER: Thank you, Evy May.

EVY MAY ROGERS-BURKETT: It's Rogers-Burkett. That's both of my husbands' names, but I just go Evy May.

BOB WHEELER: Are you speaking for him?

EVY MAY ROGERS-BURKETT: I'm speaking for Jesse Burkett, the hard-rock miner.

BOB WHEELER: Thank you. And then Tom Parker and Jann Higdem. Here comes Tom. After that is Mark Compton. Go ahead, Tom. Thank you.

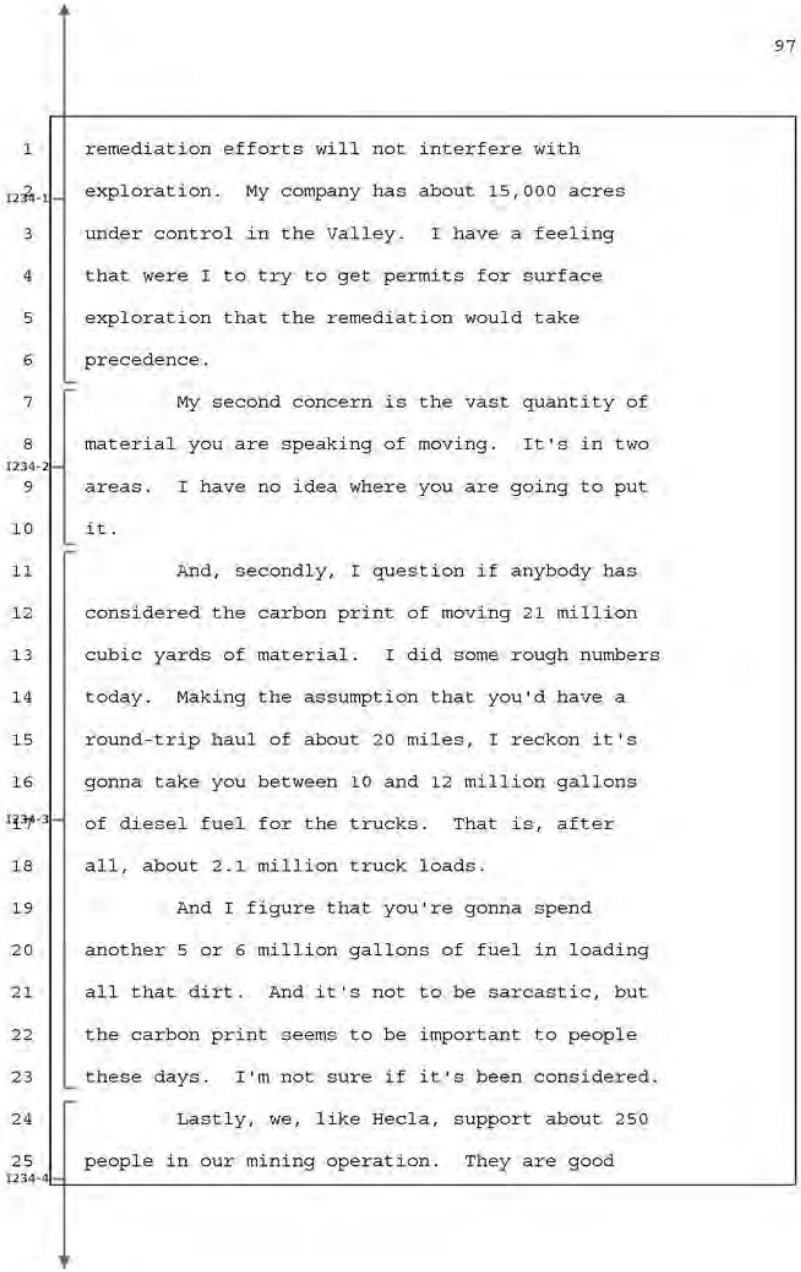
TOM PARKER: Like everyone else, I think most of what I have to say has been said. I've been representing U.S. Silver, the other operating mine in the Valley. I think I probably have three concerns.

One, I'm extremely skeptical that the

I234-1

Response to comment I234-1

See response to Comment No. I58-5.



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remediation efforts will not interfere with exploration. My company has about 15,000 acres under control in the Valley. I have a feeling that were I to try to get permits for surface exploration that the remediation would take precedence.

I234-1

My second concern is the vast quantity of material you are speaking of moving. It's in two areas. I have no idea where you are going to put it.

I234-2

And, secondly, I question if anybody has considered the carbon print of moving 21 million cubic yards of material. I did some rough numbers today. Making the assumption that you'd have a round-trip haul of about 20 miles, I reckon it's gonna take you between 10 and 12 million gallons of diesel fuel for the trucks. That is, after all, about 2.1 million truck loads.

I234-3

And I figure that you're gonna spend another 5 or 6 million gallons of fuel in loading all that dirt. And it's not to be sarcastic, but the carbon print seems to be important to people these days. I'm not sure if it's been considered.

Lastly, we, like Hecla, support about 250 people in our mining operation. They are good

I234-4

Response to comment I234-2

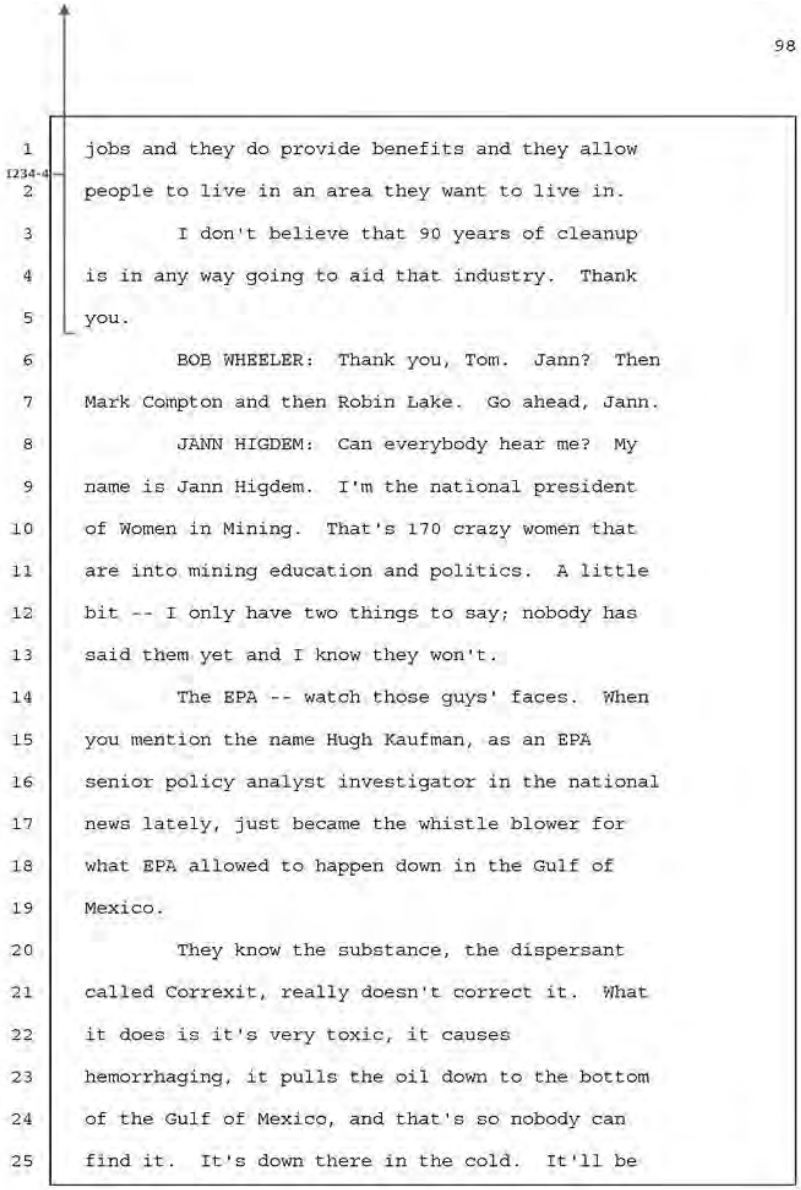
See response to Comment No. I54-3.

Response to comment I234-3

EPA intends to evaluate the efficiencies of alternative transportation systems and implementation strategies to minimize the carbon footprint of the Selected Remedy as well as maximize use of green technologies and resources available for cleanup. Also see response to Comment No. I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan.

Response to comment I234-4

See responses to Comment Nos. I58-1 and I58-5.



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jobs and they do provide benefits and they allow people to live in an area they want to live in.

I don't believe that 90 years of cleanup is in any way going to aid that industry. Thank you.

BOB WHEELER: Thank you, Tom. Jann? Then Mark Compton and then Robin Lake. Go ahead, Jann.

JANN HIGDEM: Can everybody hear me? My name is Jann Higdem. I'm the national president of Women in Mining. That's 170 crazy women that are into mining education and politics. A little bit -- I only have two things to say; nobody has said them yet and I know they won't.

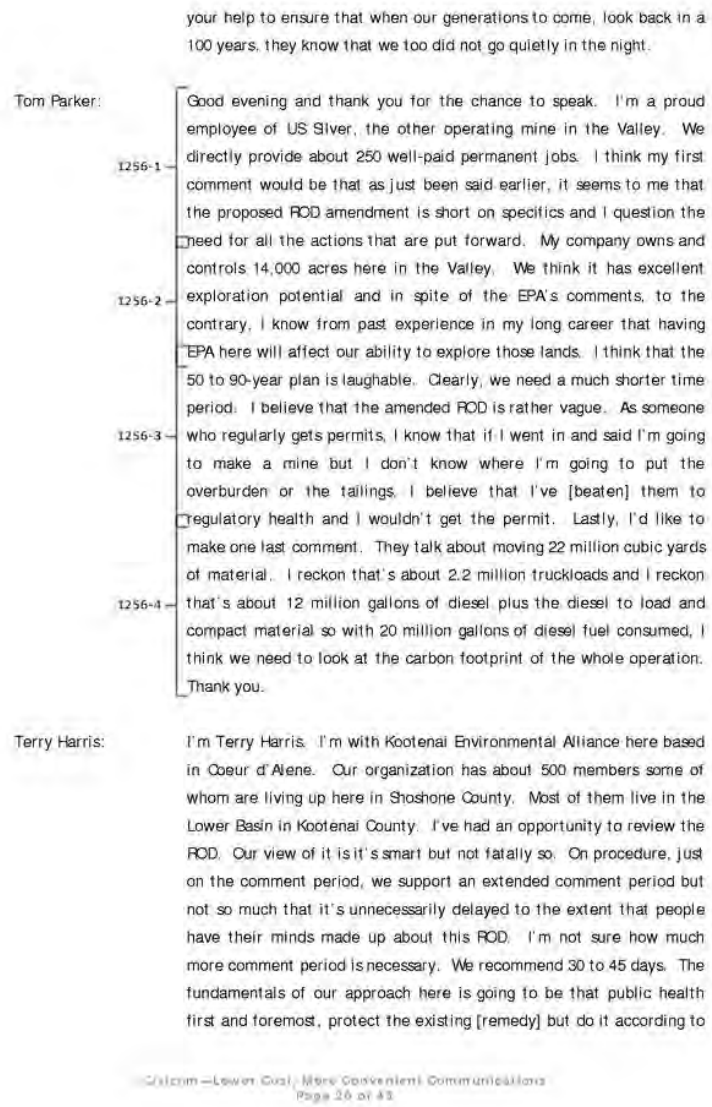
The EPA -- watch those guys' faces. When you mention the name Hugh Kaufman, as an EPA senior policy analyst investigator in the national news lately, just became the whistle blower for what EPA allowed to happen down in the Gulf of Mexico.

They know the substance, the dispersant called Correxit, really doesn't correct it. What it does is it's very toxic, it causes hemorrhaging, it pulls the oil down to the bottom of the Gulf of Mexico, and that's so nobody can find it. It's down there in the cold. It'll be

I234-4

No comments

Parker, Tom, I256, Letter 616015-16



your help to ensure that when our generations to come, look back in a 100 years, they know that we too did not go quietly in the night.

Tom Parker:

I256-1 — Good evening and thank you for the chance to speak. I'm a proud employee of US Silver, the other operating mine in the Valley. We directly provide about 250 well-paid permanent jobs. I think my first comment would be that as just been said earlier, it seems to me that the proposed ROD amendment is short on specifics and I question the need for all the actions that are put forward. My company owns and controls 14,000 acres here in the Valley. We think it has excellent

I256-2 — exploration potential and in spite of the EPA's comments, to the contrary, I know from past experience in my long career that having EPA here will affect our ability to explore those lands. I think that the 50 to 90-year plan is laughable. Clearly, we need a much shorter time period. I believe that the amended ROD is rather vague. As someone

I256-3 — who regularly gets permits, I know that if I went in and said I'm going to make a mine but I don't know where I'm going to put the overburden or the tailings. I believe that I've [beaten] them to regulatory health and I wouldn't get the permit. Lastly, I'd like to make one last comment. They talk about moving 22 million cubic yards of material. I reckon that's about 2.2 million truckloads and I reckon

I256-4 — that's about 12 million gallons of diesel plus the diesel to load and compact material so with 20 million gallons of diesel fuel consumed, I think we need to look at the carbon footprint of the whole operation. Thank you.

Terry Harris:

I'm Terry Harris. I'm with Kootenai Environmental Alliance here based in Coeur d'Alene. Our organization has about 500 members some of whom are living up here in Shoshone County. Most of them live in the Lower Basin in Kootenai County. I've had an opportunity to review the ROD. Our view of it is it's smart but not fatally so. On procedure, just on the comment period, we support an extended comment period but not so much that it's unnecessarily delayed to the extent that people have their minds made up about this ROD. I'm not sure how much more comment period is necessary. We recommend 30 to 45 days. The fundamentals of our approach here is going to be that public health first and foremost, protect the existing [remedy] but do it according to

Custom—Lower Coal, More Convenient Communications
Page 26 of 43

Response to comment I256-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Response to comment I256-2

See response to Comment No. I58-5.

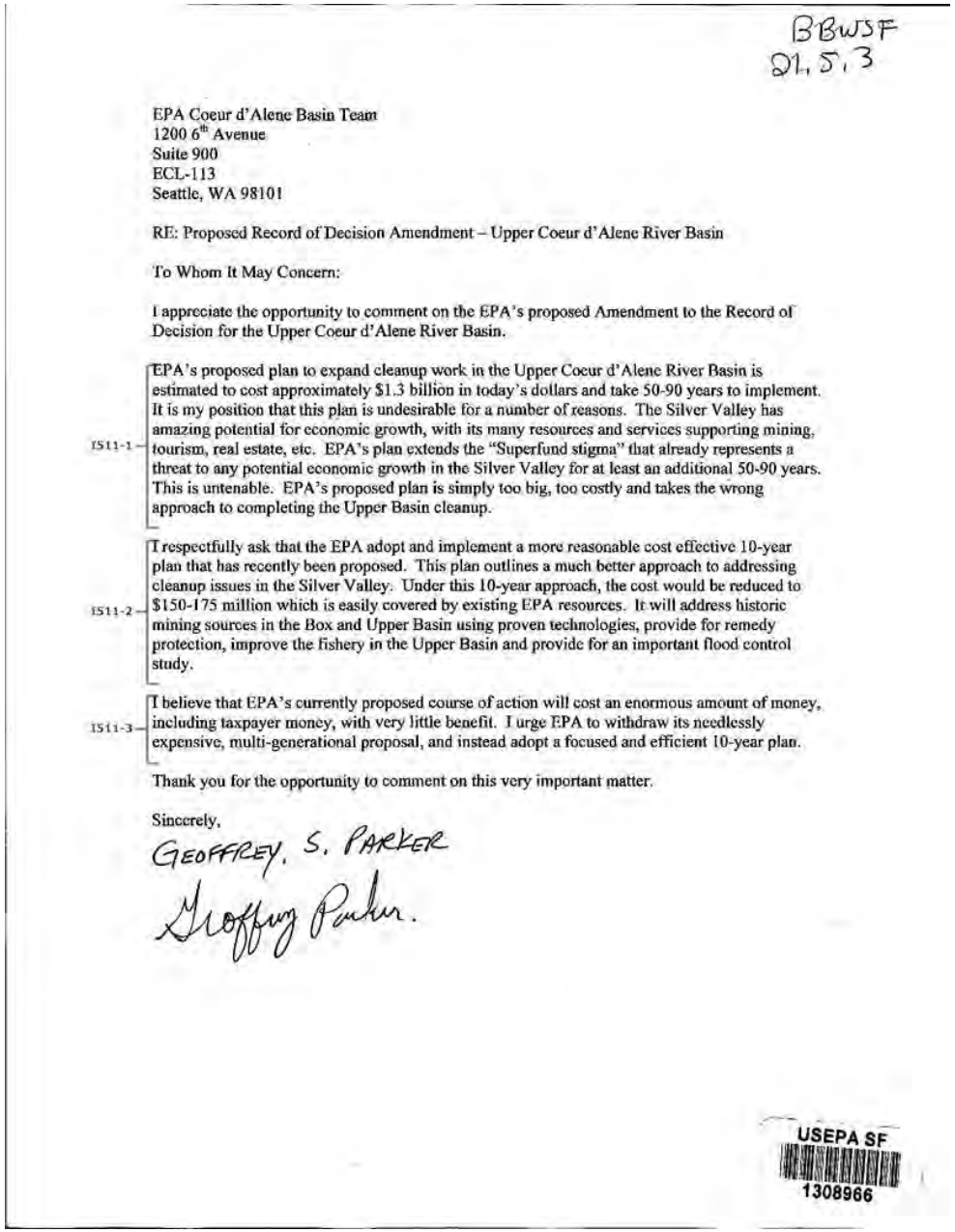
Response to comment I256-3

See response to Comment No. I58-1.

Response to comment I256-4

Comment noted. CERCLA requires that EPA address unacceptable risks to human health and the environment, such as exist in the Upper Basin. Regarding the reduced scope of the Selected Remedy, see response to Comment No. I58-1.

Parker, Geoffrey, I511, Letter 1308966



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I511-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I511-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I511-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

GEOFFREY S. PARKER

Geoffrey Parker.

USEPA SF
1308966

Response to comment I511-1

See response to Comment No. I474-1.

Response to comment I511-2

See response to Comment No. I474-2.

Response to comment I511-3

See response to Comment No. I474-3.

Parker, Geoffrey, I412, Letter 616315

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
gparker@hecla-mining.com to: formsubmission 11/15/2010 01:46 PM
Sent by: Gparker@Hecla-Mining.Com <gparker=hecla-mining.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Geoff Parker
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: One of the fundamental problems with the EPA's proposed amendment to the existing Record of Decision for cleanup in the Upper Coeur d'Alene River Basin is the fact that it ignores many of the primary recommendations from the National Academy of Sciences (NAS) review. The NAS recommended that any work plan for the Upper Coeur d'Alene River Basin should do the following:

a) Address the high priority historic mine site areas first, including in Canyon and Nine Mile Creeks and in the Box.

b) Be data-driven instead of relying on EPA's flawed predictive model.

c) Focus on the achievement of actual data-driven measures of success, rather than on numerical standards.

d) Use an adaptive management approach which would address the cleanup in stages, evaluate progress and allow for the revision of goals and strategies based on effectiveness of actions taken over time.

616315

I412-1

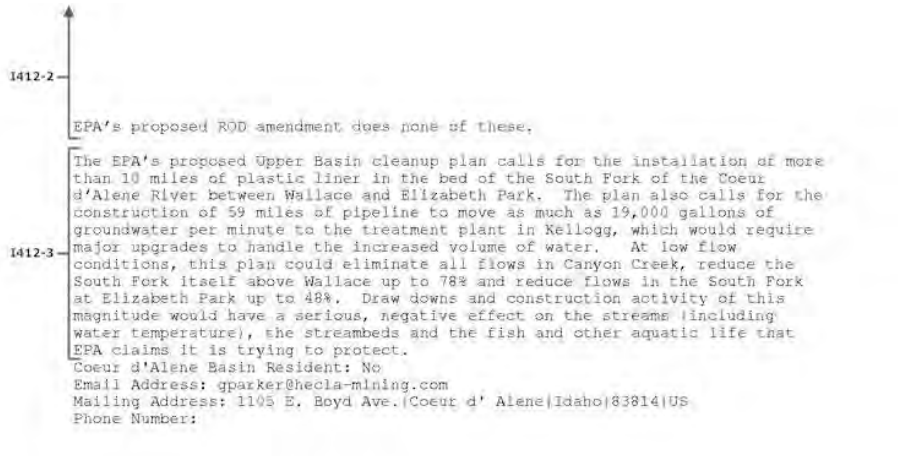
I412-2

Response to comment I412-1

See response to Comment No. I351-1.

Response to comment I412-2

See response to Comment No. LJ27-8.



I412-2

EPA's proposed ROD amendment does none of these.

I412-3

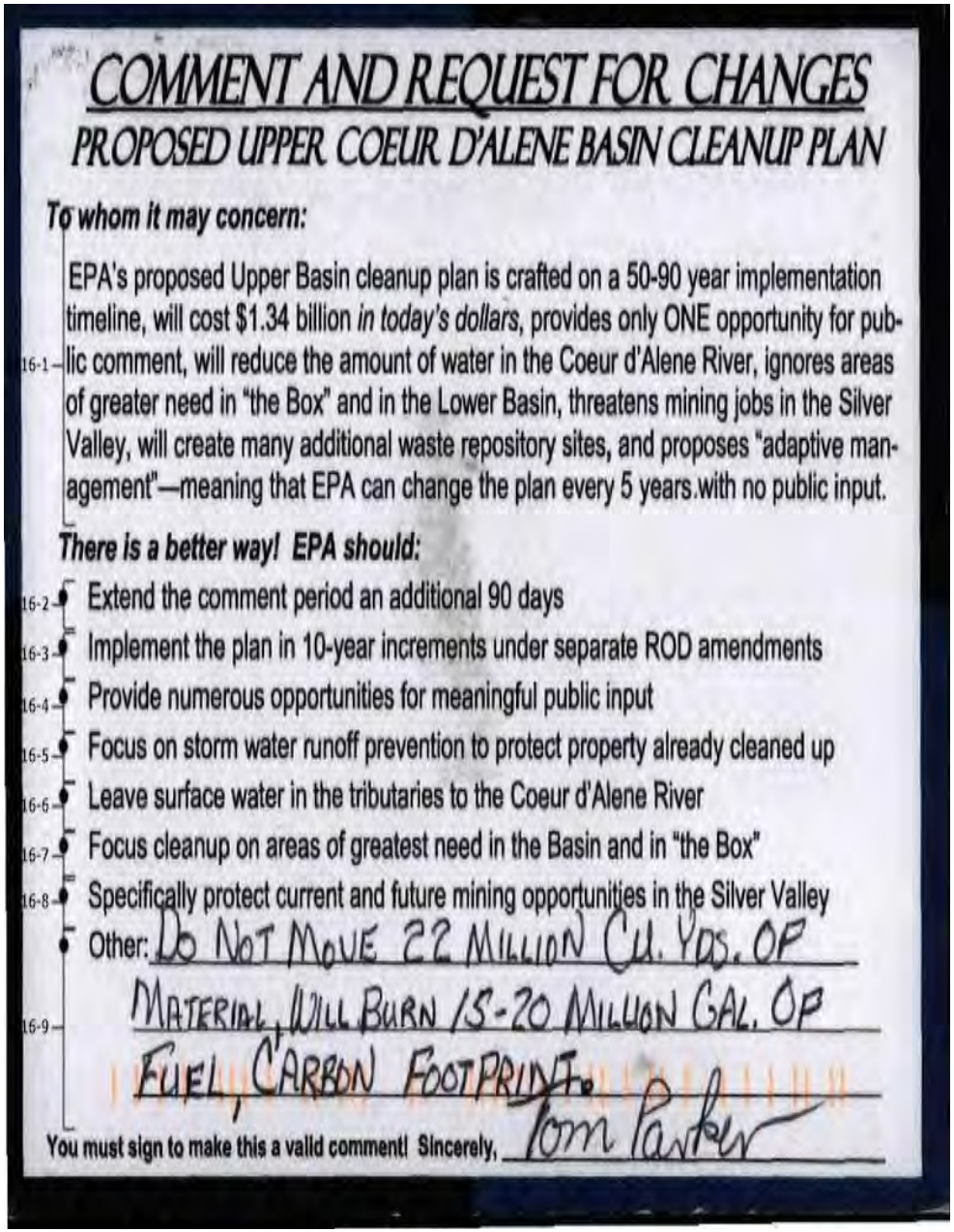
The EPA's proposed Upper Basin cleanup plan calls for the installation of more than 10 miles of plastic liner in the bed of the South Fork of the Coeur d'Alene River between Wallace and Elizabeth Park. The plan also calls for the construction of 59 miles of pipeline to move as much as 19,000 gallons of groundwater per minute to the treatment plant in Kellogg, which would require major upgrades to handle the increased volume of water. At low flow conditions, this plan could eliminate all flows in Canyon Creek, reduce the South Fork itself above Wallace up to 78% and reduce flows in the South Fork at Elizabeth Park up to 48%. Draw downs and construction activity of this magnitude would have a serious, negative effect on the streams (including water temperature), the streambeds and the fish and other aquatic life that EPA claims it is trying to protect.

Coeur d'Alene Basin Resident: No
Email Address: gparker@hecla-mining.com
Mailing Address: 1105 E. Boyd Ave.|Coeur d' Alene|Idaho|83814|US
Phone Number:

Response to comment I412-3

See response to Comment No. I54-8.

Parker, Tom, I916, Letter 1357403



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I916-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I916-2 Extend the comment period an additional 90 days
- I916-3 Implement the plan in 10-year increments under separate ROD amendments
- I916-4 Provide numerous opportunities for meaningful public input
- I916-5 Focus on storm water runoff prevention to protect property already cleaned up
- I916-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I916-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I916-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: Do Not Move 22 Million Cu. Yds. Of Material, Will Burn 15-20 Million Gal. Of Fuel, Carbon Footprint. I916-9

You must sign to make this a valid comment! Sincerely, Tom Parker

Response to comment I916-1
See response to Comment No. I25-1.

Response to comment I916-2
See response to Comment No. I25-2.

Response to comment I916-3
See response to Comment No. I25-3.

Response to comment I916-4
See response to Comment No. I25-4.

Response to comment I916-5
See response to Comment No. I25-5.

Response to comment I916-6
See response to Comment No. I25-6.

Response to comment I916-7
See response to Comment No. I25-7.

Response to comment I916-8
See response to Comment No. I25-8.

Response to comment I916-9
Comment noted.

Parody, Fran, I335, Letter 614465

Upper CDA River Basin plan
Fran Parody
to:
CDABasin
10/31/2010 08:56 AM
Show Details

I335-1 I am very much opposed to your proposed remediation program for the Upper CDA Basin. Ninety years and $1.3 billion in costs is absolutely ridiculous! Having lived in the Silver Valley (Kellogg) for ten years, I am very familiar with the EPA's remediation practices. At that time, I owned four houses in Kellogg, all of which were 'remediated.'

1. 637 S. Division, my primary residence, was remediated. On this perfectly FLAT lot, it took three attempts to level out the 'new, clean' dirt. When that didn't work, they farmed out the job to another contractor. That was, however, all at a cost of $65 per hour. What a ridiculous waste! If someone making $65 an hour driving a grader doesn't know what 'level' means, either the company employing him or the employee has a problem. I also had a garden area which, after your remediation, was like cement. Horrible dirt! (And just to add some comedy to this, when discussing my yard remediation with a supervisor, I said -- "Do anything, anywhere you want, but don't dig up this one small corner. My cat is buried there." I wasn't home the day they actually dug the yard. Wrong move!! I came home, and of course there was no more cat.") I335-2

2. 637-A S. Division, a rental, was remediated. This was an extremely small lot that included some land going up the hillside behind it. The small, flat portion of my property was remediated, but not the hillside. When I asked the contractor: Well, won't rain/snow run-off cause all that "dirty" dirt on the hillside to funnel down into the nice "clean" dirt my tax money is paying for you to bring in? His answer was: Yeah, but we don't remediate hillsides. Doesn't that kind of defeat the purpose??? And it's my taxes that are helping pay for this! And now you propose spending $1.3 billion more??

3. 110 E. Cameron, a rental, was remediated. The 'new, clean' dirt is like cement! I still own this house.

4. 218 E. Idaho, a rental, was remediated. Same result -- cement! I still own this house.

So I am very much aware of the EPA's wasteful spending practices that are forced on us, and I and many other residents think it's time to put an end to this.

I335-3 You say your project would go on for NINETY years???? In the last ninety years, we've had a couple wars, a depression, etc. Ninety years is an awfully long time to commit the area to being under your governance. And $1.3 billion is an extremely excessive amount of money to expect taxpayers to burden themselves with, especially in economic times like we're experiencing now. I335-4

I335-5 You have been running newspaper ads in the CDA/Post Falls Press informing the people about the 'facts' of this cleanup effort. In your Topic No. 1 (9-19-2010), the article talked about the 'great progress' EPA is making cleaning up the Basin. Making reference to my four Kellogg properties above and their cleanup results, I'm not so sure how 'great' this progress is. When you take credit for 'replanting barren hillsides,' you should remember that it was Sunshine Mine that started that practice years ago. The I335-6

I335-7 article also mentions the lead contamination that remains. Well, now that you've remediated the yards with 'clean, contaminant-free' dirt, kids can go outside and safely dig in the dirt. However, when they go back inside, many of their houses contain asbestos and other lead-based materials (like paint). Maybe you're planning on building all those nice folks new 'clean' homes??? Before moving to Kellogg, I heard about all the lead, contamination, etc. The first house I bought in Kellogg (218 Idaho), I bought from the estate of someone who had died. She was 103 years old! So I figured I didn't have to worry too much about becoming contaminated.

Then there is your Topic No. 3 (9-29-2010), which states EPA's goals.

614465

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web1125.h... 11/5/2010

Response to comment I335-1
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I335-2
Comment noted.

Response to comment I335-3
See response to Comment No. I58-1.

Response to comment I335-4
See response to Comment No. I58-2.

Response to comment I335-5
EPA has consistently stated and shown that protection of human health in the Coeur d'Alene Basin is its highest priority. Since the ROD for OU 3 was issued in 2002, EPA has carried out the majority of the Selected Human Health Remedy throughout the residential areas of the Upper Basin. Past cleanup plans described in the RODs for OUs 1, 2, and 3 (EPA, 1991, 1992, 2002, respectively; available at www.epa.gov/superfund/sites/rods/fulltext/r1002032.pdf) have already addressed residential drinking water issues. However, the Upper Basin Selected Remedy will significantly improve surface water quality in the SFCDR and its tributaries. The Selected Remedy will also provide additional human health protection by cleaning up surface mine waste.

Response to comment I335-6
Comment noted.

Response to comment I335-7
Comment noted.

I335-8 1. First you say you will protect people and wildlife. While I lived in Kellogg (1994 to 2004), the only year I remember seeing a decrease in wildlife was the year we had a tremendously excessive amount of snow -- result: food much harder to get for wildlife, and many died; you're right.....except it wasn't the hazardous material that killed them, it was Mother Nature.

I335-9 2. Next goal was to help the local econoomy by employing local workers. I'm sure some are hired locally, but many are imported from Seattle and the like. (And if those you hire locally can't figure out how to re-grade a completely flat piece of dirt, while making $65/hour trying to do it, maybe you shouldn't be hiring locally.)

I335-10 3. Third goal was to create more safe recreation areas. If I lived somewhere else and perhaps thought about a vacation around the CDA Basin area, I doubt that I'd rush to visit a remediation site!! But if I did decide to visit, I guess I'd have to wait NINETY years until you get everything 'clean.' Right??? And as for providing safer streams (and Lake CDA), it has been years since this contamination was dumped into streams and the lake. It's covered over by silt that, if disturbed, will uncover it when there's no need to. Why don't you leave well enough alone!

I335-11 4. The article also mentions past cleanup in the Silver Valley. There's that "hillsides" reference again. I hope you're not referencing my 'hillside' at 637-A S. Division, because that wasn't worthy of your attention.

I335-12 5. And you say your involvement in the Silver Valley **for the next NINETY years** is going to attract businesses? Good Lord! What might attract businesses could possibly be lower taxes or incentives, relatively flat land large enough to house businesses (manufacturing, warehouses, etc.), a more open and welcoming inclusion of newcomers into the community by the local people, etc. I'm quite sure being a superfund site for the next century won't be very attractive to either work or play in. But if by some strange fluke, businesses are attracted by your remediation efforts, I guess they'd have to wait almost a century before relocating to the CDA Basin so they'd be assured it's 'clean.'

I335-13 Next would be your claim that the EPA will protect the drinking water. Last time I checked, drinking water sources weren't downstream from former mining activities. Do people actually believe you when you make these claims?

I335-14 I think you've read enough, and I've typed enough. But I hope you actually Hear what a majority of residents here think. I hope you weren't just holding public meetings here to hear yourself talk. And hopefully you'll actually Listen to us and re-think this remediation plan, because none of us here locally concur that this is a good way to spend our tax money for the next century.

Sincerely,

Fran Parody
4970 E. Shoreline Dr.
Post Falls, ID 83854

Response to comment I335-8

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. As described in the ROD Amendment, the levels of contamination significantly exceed acceptable state and site-specific water quality standards.

Response to comment I335-9

See response to Comment No. LC32-2.

Response to comment I335-10

See response to Comment No. I295-1.

Response to comment I335-11

Comment noted. The location, description, and cleanup work conducted for the hillsides is present in the 2010 Five-Year Review Report (EPA, November 2010, http://www.epa.gov/region10/pdf/sites/bunker_hill/bunkerhill-3rd-fyr-111810.pdf).

Response to comment I335-12

See responses to Comment Nos. I58-1 and I54-2.

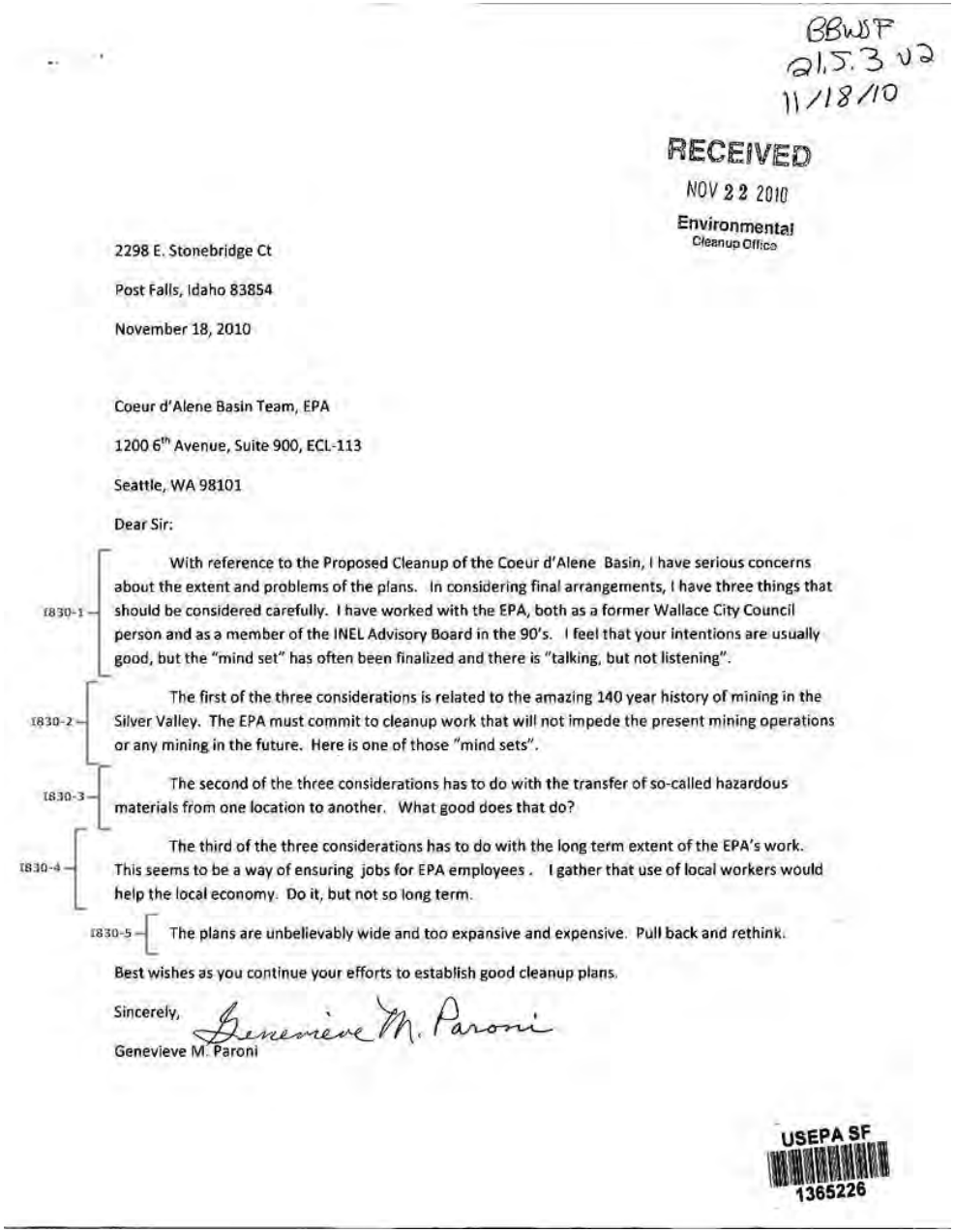
Response to comment I335-13

EPA has not focused its Selected Remedy on drinking water. Past cleanup plans have already addressed residential drinking water issues. However, the Upper Basin Selected Remedy will significantly improve surface water quality in the SFCDR and its tributaries. In the case of the SFCDR, the applicable or relevant and appropriate requirements (ARARs) that will protect the environment include site-specific ambient water quality criteria (AWQC). These criteria were developed by the State of Idaho to protect aquatic life. The water quality standards to protect the environment are more stringent than drinking water standards (i.e., maximum contaminant levels [MCLs]) for contaminants of concern in the Basin. (There is one exception -- mercury, as it has not been found to be prevalent in the Upper Basin.) Therefore, EPA believes that achieving ARARs will inherently have a potential drinking water benefit.

Response to comment I335-14

Thank you for your comments.

Paroni, Genevieve M., I830, Letter 1365226



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RECEIVED
NOV 22 2010
Environmental
Cleanup Office

2298 E. Stonebridge Ct

Post Falls, Idaho 83854

November 18, 2010

Coeur d'Alene Basin Team, EPA

1200 6th Avenue, Suite 900, ECL-113

Seattle, WA 98101

Dear Sir:

I830-1 With reference to the Proposed Cleanup of the Coeur d'Alene Basin, I have serious concerns about the extent and problems of the plans. In considering final arrangements, I have three things that should be considered carefully. I have worked with the EPA, both as a former Wallace City Council person and as a member of the INEL Advisory Board in the 90's. I feel that your intentions are usually good, but the "mind set" has often been finalized and there is "talking, but not listening".

I830-2 The first of the three considerations is related to the amazing 140 year history of mining in the Silver Valley. The EPA must commit to cleanup work that will not impede the present mining operations or any mining in the future. Here is one of those "mind sets".

I830-3 The second of the three considerations has to do with the transfer of so-called hazardous materials from one location to another. What good does that do?

I830-4 The third of the three considerations has to do with the long term extent of the EPA's work. This seems to be a way of ensuring jobs for EPA employees . I gather that use of local workers would help the local economy. Do it, but not so long term.

I830-5 The plans are unbelievably wide and too expansive and expensive. Pull back and rethink.

Best wishes as you continue your efforts to establish good cleanup plans.

Sincerely,

Genevieve M. Paroni

Genevieve M. Paroni

USEPA SF
1365226

Response to comment I830-1

EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. See response to Comment No. I474-1.

Response to comment I830-2

See response to Comment No. I58-5.

Response to comment I830-3

See response to Comment No. I54-3.

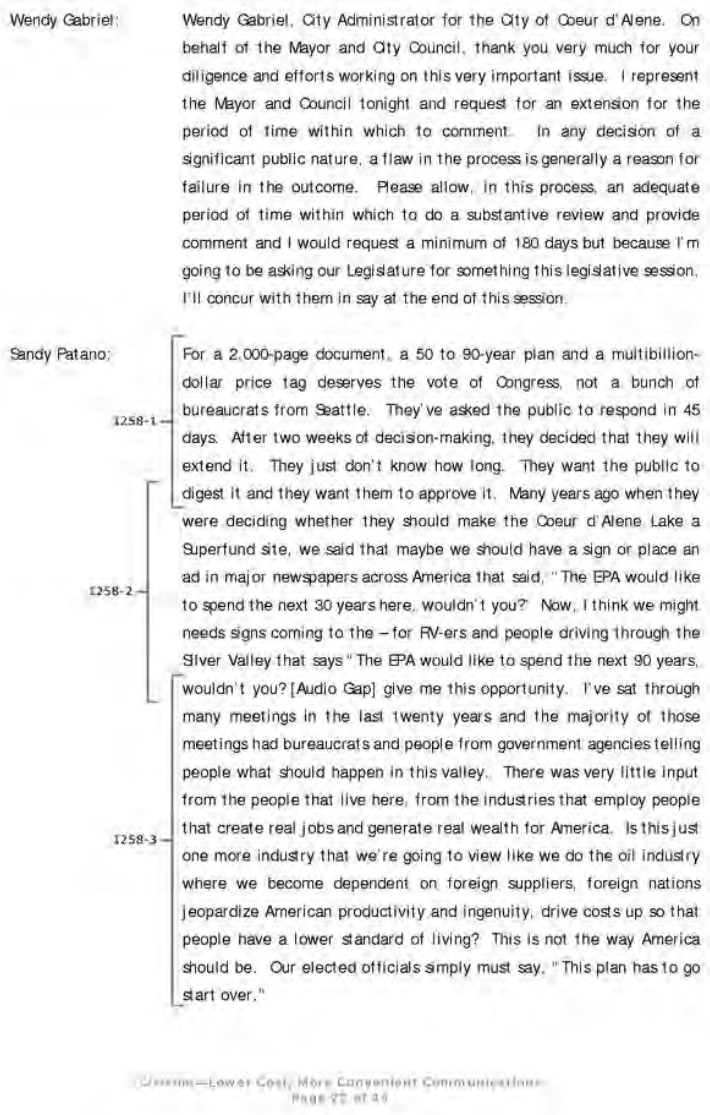
Response to comment I830-4

See response to Comment No. I58-1.

Response to comment I830-5

See response to Comment No. I58-1 regarding the reduced scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan.

Patano, Sandy, I258, Letter 616015-21



Wendy Gabriel: Wendy Gabriel, City Administrator for the City of Coeur d'Alene. On behalf of the Mayor and City Council, thank you very much for your diligence and efforts working on this very important issue. I represent the Mayor and Council tonight and request for an extension for the period of time within which to comment. In any decision of a significant public nature, a flaw in the process is generally a reason for failure in the outcome. Please allow, in this process, an adequate period of time within which to do a substantive review and provide comment and I would request a minimum of 180 days but because I'm going to be asking our Legislature for something this legislative session, I'll concur with them in say at the end of this session.

Sandy Patano:

I258-1 For a 2,000-page document, a 50 to 90-year plan and a multibillion-dollar price tag deserves the vote of Congress, not a bunch of bureaucrats from Seattle. They've asked the public to respond in 45 days. After two weeks of decision-making, they decided that they will extend it. They just don't know how long. They want the public to digest it and they want them to approve it. Many years ago when they were deciding whether they should make the Coeur d'Alene Lake a Superfund site, we said that maybe we should have a sign or place an ad in major newspapers across America that said, "The EPA would like to spend the next 30 years here, wouldn't you?" Now, I think we might needs signs coming to the – for RV-ers and people driving through the Silver Valley that says "The EPA would like to spend the next 90 years, wouldn't you? [Audio Gap] give me this opportunity. I've sat through many meetings in the last twenty years and the majority of those meetings had bureaucrats and people from government agencies telling people what should happen in this valley. There was very little input from the people that live here, from the industries that employ people that create real jobs and generate real wealth for America. Is this just one more industry that we're going to view like we do the oil industry where we become dependent on foreign suppliers, foreign nations jeopardize American productivity and ingenuity, drive costs up so that people have a lower standard of living? This is not the way America should be. Our elected officials simply must say, "This plan has to go start over."

I258-2

I258-3

[illegible]=Lower Cost, More Convenient Communications
Page [illegible] of 44

Response to comment I258-1

See responses to Comment Nos. LJ39-5 and I54-6.

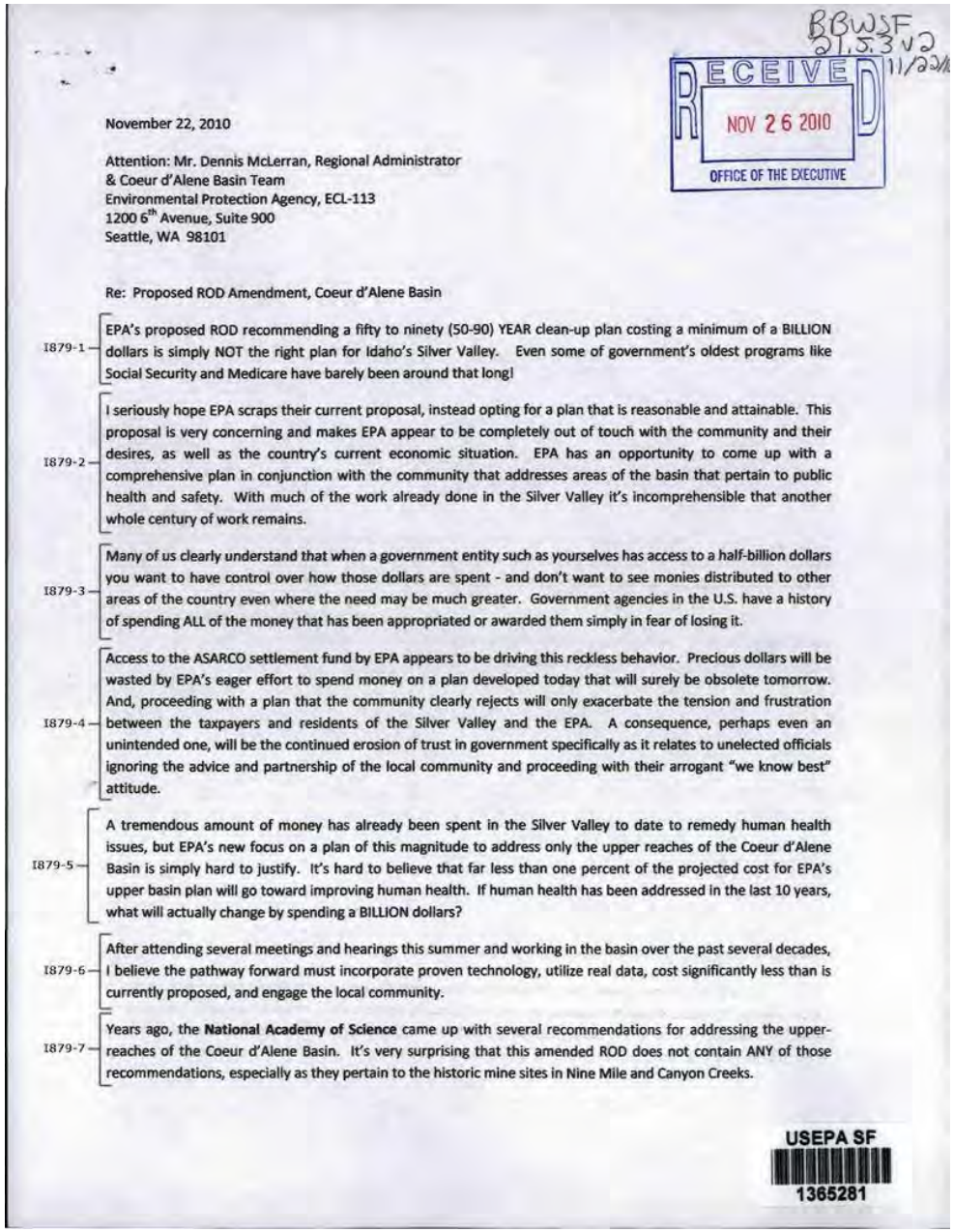
Response to comment I258-2

See Response to Comment No. I58-1.

Response to comment I258-3

See response to Comment No. I295-2.

Patano, Sandra, I879, Letter 1365281



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11/22/1

RECEIVED
NOV 26 2010
OFFICE OF THE EXECUTIVE

November 22, 2010

Attention: Mr. Dennis McLerran, Regional Administrator
& Coeur d'Alene Basin Team
Environmental Protection Agency, ECL-113
1200 6th Avenue, Suite 900
Seattle, WA 98101

Re: Proposed ROD Amendment, Coeur d'Alene Basin

I879-1 EPA's proposed ROD recommending a fifty to ninety (50-90) YEAR clean-up plan costing a minimum of a BILLION dollars is simply NOT the right plan for Idaho's Silver Valley. Even some of government's oldest programs like Social Security and Medicare have barely been around that long!

I879-2 I seriously hope EPA scraps their current proposal, instead opting for a plan that is reasonable and attainable. This proposal is very concerning and makes EPA appear to be completely out of touch with the community and their desires, as well as the country's current economic situation. EPA has an opportunity to come up with a comprehensive plan in conjunction with the community that addresses areas of the basin that pertain to public health and safety. With much of the work already done in the Silver Valley it's incomprehensible that another whole century of work remains.

I879-3 Many of us clearly understand that when a government entity such as yourselves has access to a half-billion dollars you want to have control over how those dollars are spent - and don't want to see monies distributed to other areas of the country even where the need may be much greater. Government agencies in the U.S. have a history of spending ALL of the money that has been appropriated or awarded them simply in fear of losing it.

I879-4 Access to the ASARCO settlement fund by EPA appears to be driving this reckless behavior. Precious dollars will be wasted by EPA's eager effort to spend money on a plan developed today that will surely be obsolete tomorrow. And, proceeding with a plan that the community clearly rejects will only exacerbate the tension and frustration between the taxpayers and residents of the Silver Valley and the EPA. A consequence, perhaps even an unintended one, will be the continued erosion of trust in government specifically as it relates to unelected officials ignoring the advice and partnership of the local community and proceeding with their arrogant "we know best" attitude.

I879-5 A tremendous amount of money has already been spent in the Silver Valley to date to remedy human health issues, but EPA's new focus on a plan of this magnitude to address only the upper reaches of the Coeur d'Alene Basin is simply hard to justify. It's hard to believe that far less than one percent of the projected cost for EPA's upper basin plan will go toward improving human health. If human health has been addressed in the last 10 years, what will actually change by spending a BILLION dollars?

I879-6 After attending several meetings and hearings this summer and working in the basin over the past several decades, I believe the pathway forward must incorporate proven technology, utilize real data, cost significantly less than is currently proposed, and engage the local community.

I879-7 Years ago, the **National Academy of Science** came up with several recommendations for addressing the upper-reaches of the Coeur d'Alene Basin. It's very surprising that this amended ROD does not contain ANY of those recommendations, especially as they pertain to the historic mine sites in Nine Mile and Canyon Creeks.

USEPA SF
1365281

Response to comment I879-1
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I879-2
See response to Comment No. I58-1.

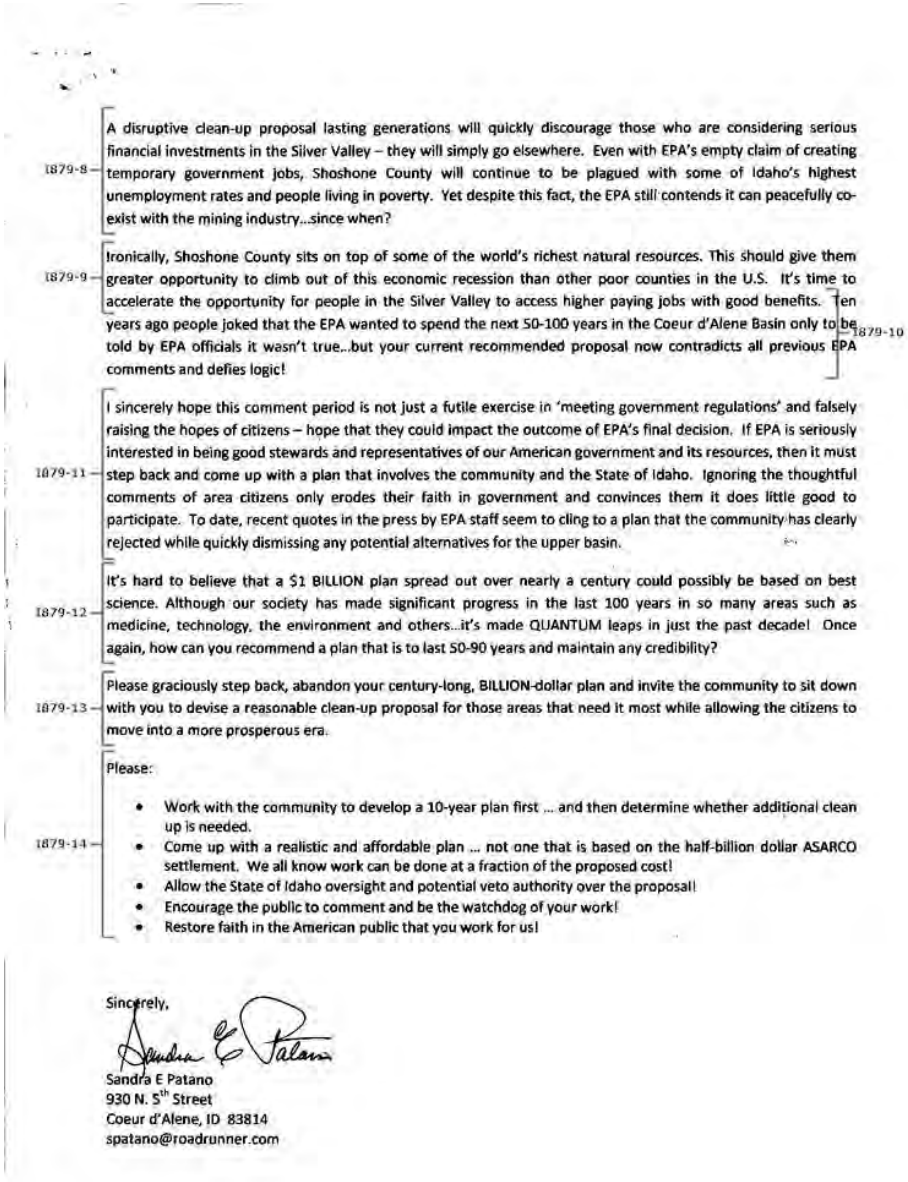
Response to comment I879-3
Comment noted.

Response to comment I879-4
See responses to Comment Nos. I58-2 and I295-2.

Response to comment I879-5
See response to Comment No. I295-1.

Response to comment I879-6
See responses to Comment Nos. I58-1 and I295-2.

Response to comment I879-7
See response to Comment No. LJ27-8.



I879-8 A disruptive clean-up proposal lasting generations will quickly discourage those who are considering serious financial investments in the Silver Valley – they will simply go elsewhere. Even with EPA's empty claim of creating temporary government jobs, Shoshone County will continue to be plagued with some of Idaho's highest unemployment rates and people living in poverty. Yet despite this fact, the EPA still contends it can peacefully co-exist with the mining industry...since when?

I879-9 Ironically, Shoshone County sits on top of some of the world's richest natural resources. This should give them greater opportunity to climb out of this economic recession than other poor counties in the U.S. It's time to accelerate the opportunity for people in the Silver Valley to access higher paying jobs with good benefits. Ten years ago people joked that the EPA wanted to spend the next 50-100 years in the Coeur d'Alene Basin only to be told by EPA officials it wasn't true...but your current recommended proposal now contradicts all previous EPA comments and defies logic! I879-10

I879-11 I sincerely hope this comment period is not just a futile exercise in 'meeting government regulations' and falsely raising the hopes of citizens – hope that they could impact the outcome of EPA's final decision. If EPA is seriously interested in being good stewards and representatives of our American government and its resources, then it must step back and come up with a plan that involves the community and the State of Idaho. Ignoring the thoughtful comments of area citizens only erodes their faith in government and convinces them it does little good to participate. To date, recent quotes in the press by EPA staff seem to cling to a plan that the community has clearly rejected while quickly dismissing any potential alternatives for the upper basin.

I879-12 It's hard to believe that a $1 BILLION plan spread out over nearly a century could possibly be based on best science. Although our society has made significant progress in the last 100 years in so many areas such as medicine, technology, the environment and others...it's made QUANTUM leaps in just the past decade! Once again, how can you recommend a plan that is to last 50-90 years and maintain any credibility?

I879-13 Please graciously step back, abandon your century-long, BILLION-dollar plan and invite the community to sit down with you to devise a reasonable clean-up proposal for those areas that need it most while allowing the citizens to move into a more prosperous era.

I879-14 Please:

- Work with the community to develop a 10-year plan first ... and then determine whether additional clean up is needed.
- Come up with a realistic and affordable plan ... not one that is based on the half-billion dollar ASARCO settlement. We all know work can be done at a fraction of the proposed cost!
- Allow the State of Idaho oversight and potential veto authority over the proposal!
- Encourage the public to comment and be the watchdog of your work!
- Restore faith in the American public that you work for us!

Sincerely,

Sandra E Patano

Sandra E Patano
930 N. 5th Street
Coeur d'Alene, ID 83814
spatano@roadrunner.com

Response to comment I879-8

See responses to Comment Nos. I474-1 and I58-5.

Response to comment I879-9

See responses to Comment Nos. I54-2 and I58-5.

Response to comment I879-10

See response to Comment No. I58-1.

Response to comment I879-11

See response to Comment No. I295-2.

Response to comment I879-12

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I879-13

See responses to Comment Nos. I295-2 and I58-2.

Response to comment I879-14

See responses to Comment Nos. I58-1, I58-2, I58-4, and I474-2.

Patterson, Eric, I718, Letter 618335

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
pattersonbees@aol.com to: formsubmission 11/17/2010 02:07 PM
Sent by: Pattersonbees@Aol.Com <pattersonbees=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: eric patterson
Date: 02/01/1981
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. I am against anything that might stop mining in any way. With out mining our community there would be no way to make a good living. The EPA in my opinion is careless and wastefull with tax payers dollars. I have heard stories from people that have worked on the clean up and learned that most the work that has already been done did not even get to the contaminated soil. They simply scratched the surface to the contamination, hauled off the(so called contaminated soil) and hauled in new dirt. This is a waste of resources and money and another reason we are so heavily taxed. Please stop your careless spending and leave our rivers alone, there are more contaminated places in our country that need a costly and unnecessary clean up. I718-1
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high I718-2
Additional Comments: I would support a plan that was meaningfull and usefull and would only be in the best intrest of our enviroment. I am all for helping to keep our enviromnet and drinking water clean. I am a miner and an outdoorsmen and want to protect our enviroment for my kids to enjoy. I will not support the epa on there plan to rip off the american tax payers and take our jobs away to line their own pockets. I718-3
Coeur d'Alene Basin Resident: Yes
Email Address: pattersonbees@aol.com
Mailing Address: po box 60|osburn|ID|83849|US
Phone Number:

618335

Response to comment I718-1

Commented noted. See responses to Comment Nos. I295-3 and I58-5.

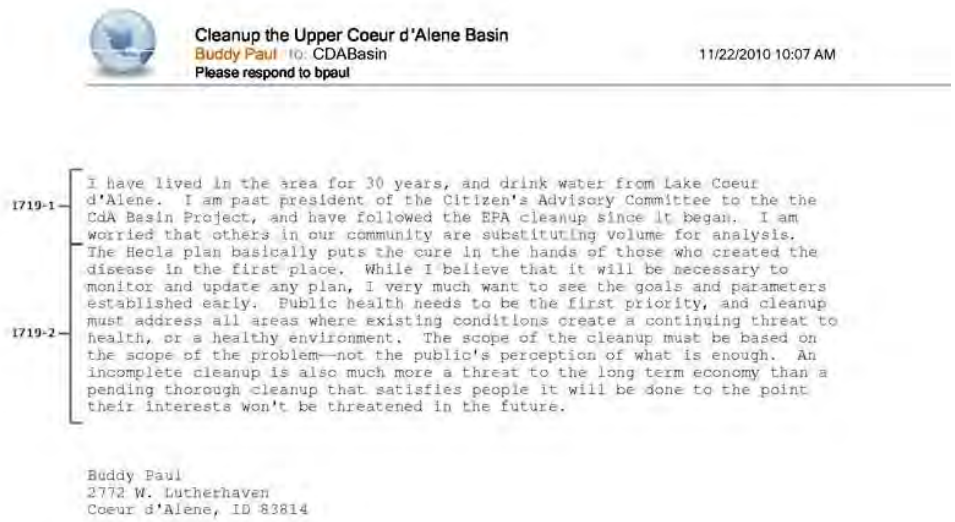
Response to comment I718-2

See response to Comment No. I351-1.

Response to comment I718-3

See response to Comment No. LJ39-5.

Paul, Buddy, I719, Letter 618336



Cleanup the Upper Coeur d'Alene Basin
Buddy Paul To: CDABasin 11/22/2010 10:07 AM
Please respond to bpaul

I719-1 I have lived in the area for 30 years, and drink water from Lake Coeur d'Alene. I am past president of the Citizen's Advisory Committee to the the CdA Basin Project, and have followed the EPA cleanup since it began. I am worried that others in our community are substituting volume for analysis. The Hecla plan basically puts the cure in the hands of those who created the disease in the first place. While I believe that it will be necessary to monitor and update any plan, I very much want to see the goals and parameters established early. Public health needs to be the first priority, and cleanup

I719-2 must address all areas where existing conditions create a continuing threat to health, or a healthy environment. The scope of the cleanup must be based on the scope of the problem—not the public's perception of what is enough. An incomplete cleanup is also much more a threat to the long term economy than a pending thorough cleanup that satisfies people it will be done to the point their interests won't be threatened in the future.

Buddy Paul
2772 W. Lutherhaven
Coeur d'Alene, ID 83814

618336

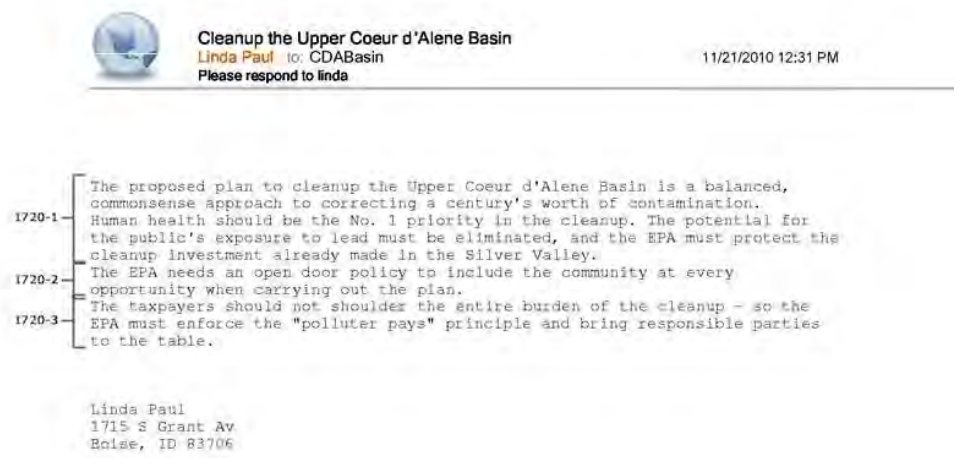
Response to comment I719-1

Comment noted.

Response to comment I719-2

EPA shares your desire for, and is committed to, mitigating unacceptable risks to human health and the environment in the Basin. The Selected Remedy will make significant strides in this direction.

Paul, Linda, I720, Letter 618717



Cleanup the Upper Coeur d'Alene Basin
Linda Paul to: CDABasin 11/21/2010 12:31 PM
Please respond to linda

I720-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I720-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I720-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Linda Paul
1715 S Grant Av
Boise, ID 83706

618717

Response to comment I720-1

See response to Comment No. I295-1.

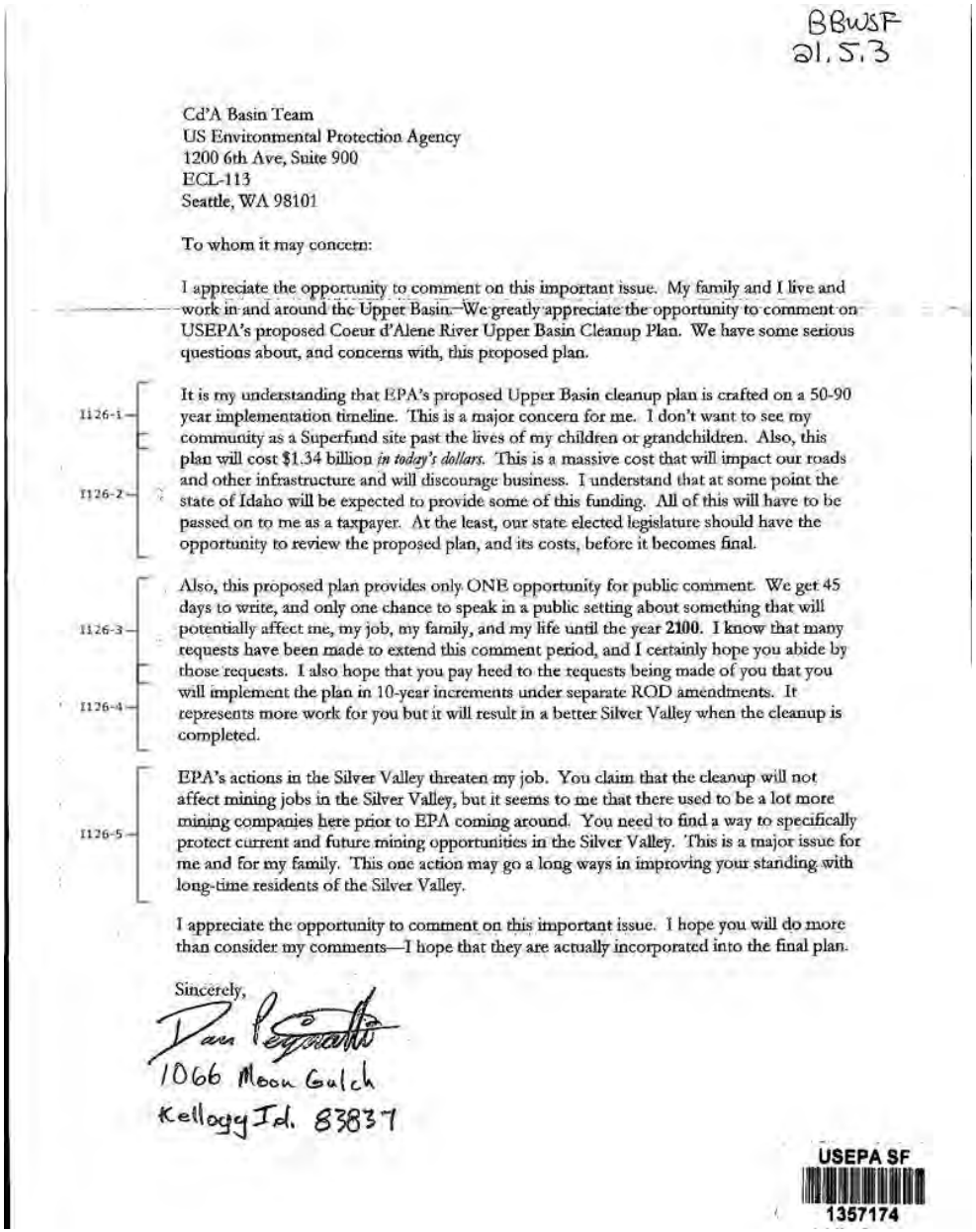
Response to comment I720-2

See response to Comment No. I295-2.

Response to comment I720-3

See response to Comment No. I295-3.

Pegualli, Dan, I126, Letter 1357174



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I126-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I126-2 — plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I126-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I126-4 — will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I126-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Dan Pegualli
1066 Moon Gulch
Kellogg Id. 83837

USEPA SF
1357174

Response to comment I126-1
See response to Comment No. I58-1.

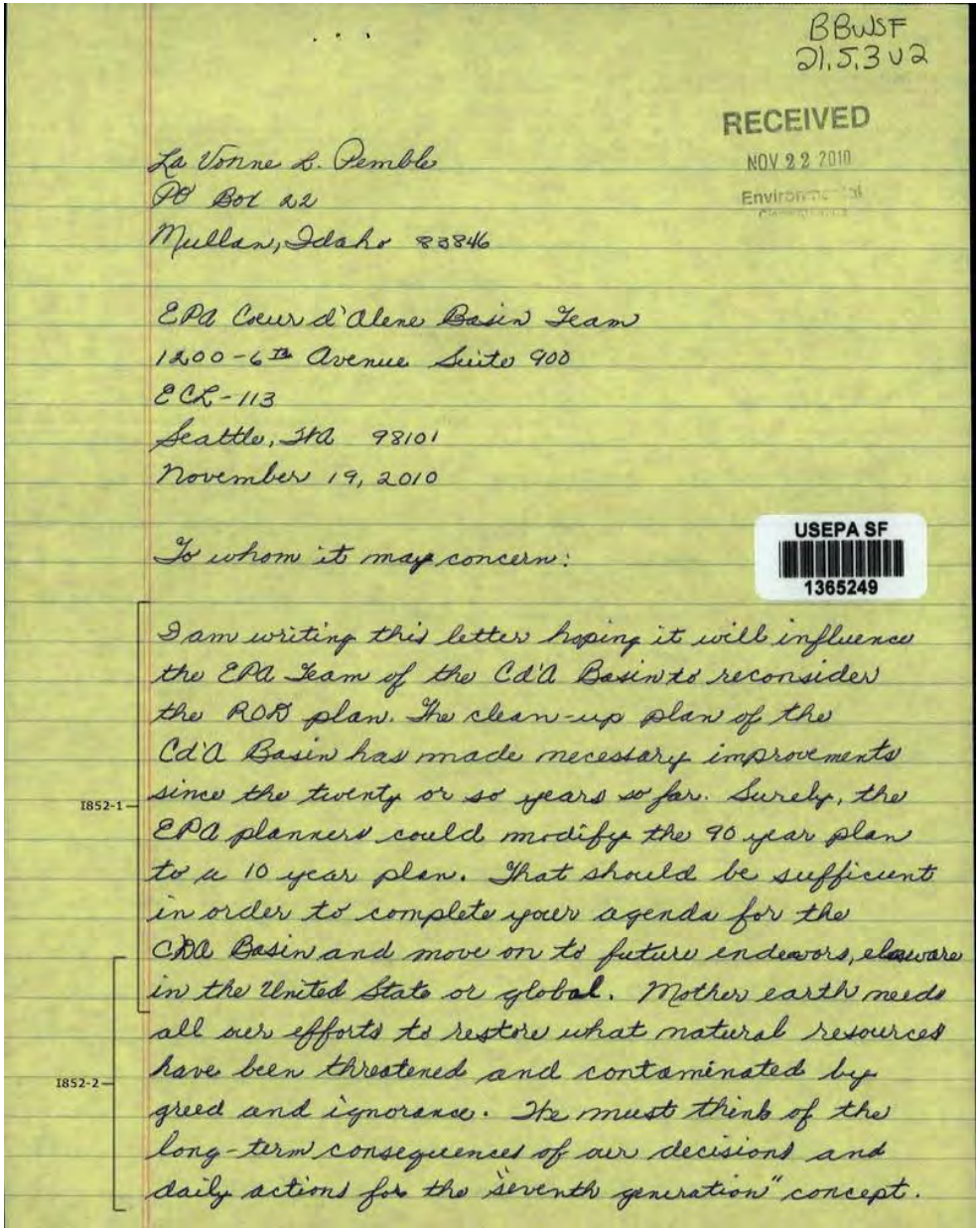
Response to comment I126-2
See response to Comment No. I58-2.

Response to comment I126-3
See response to Comment No. I58-3.

Response to comment I126-4
See response to Comment No. I58-4.

Response to comment I126-5
See response to Comment No. I58-5.

Pemble, La Vonne L., I852, Letter 1365249



BBWSF
21.5.3 v2

RECEIVED
NOV 22 2010
Environmental

La Vonne L. Pemble
PO Box 22
Mullan, Idaho 83846

EPA Coeur d'Alene Basin Team
1200-6th Avenue Suite 900
ECL-113
Seattle, WA 98101
November 19, 2010

USEPA SF
1365249

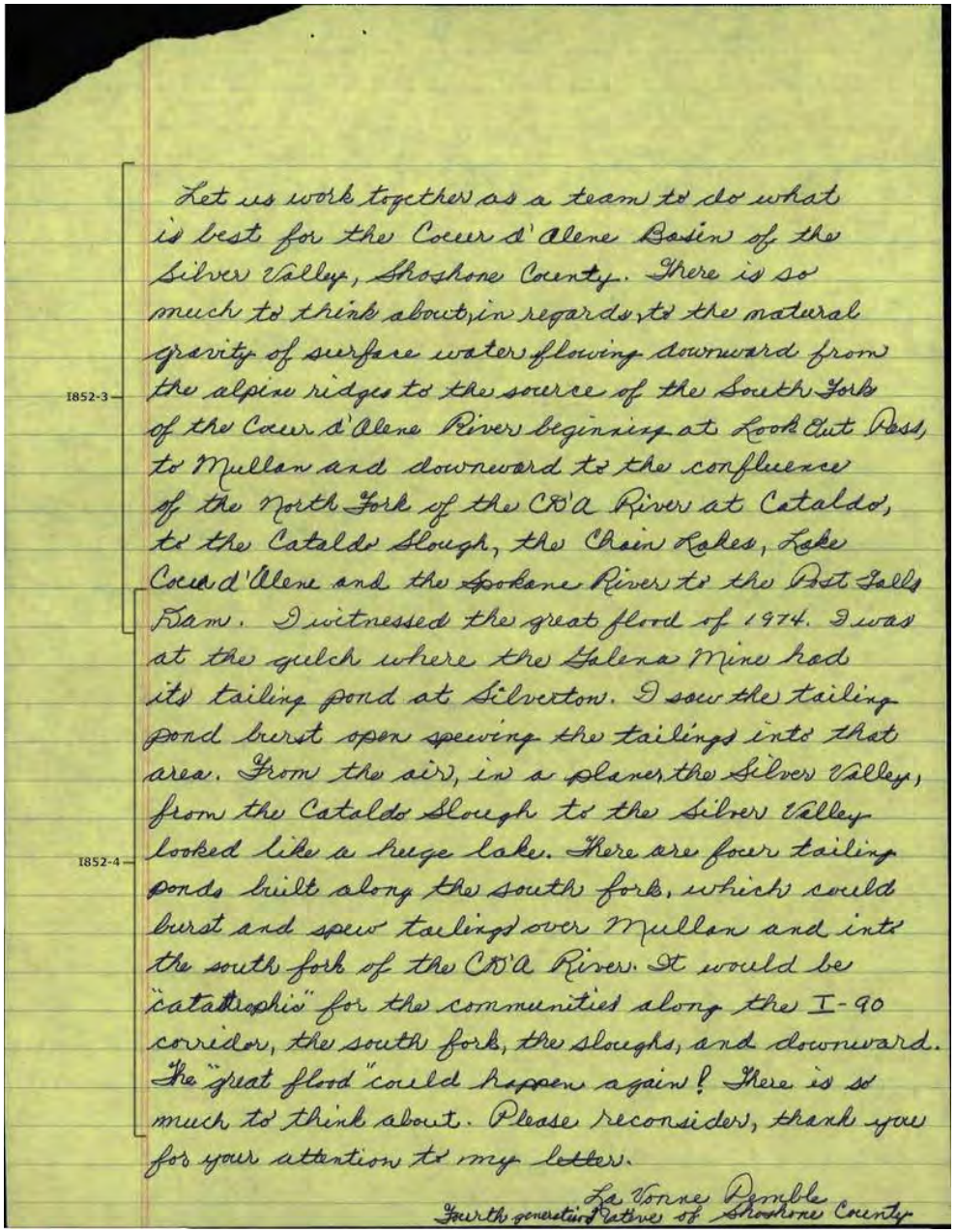
To whom it may concern:

I852-1 I am writing this letter hoping it will influence the EPA Team of the Cd'A Basin to reconsider the ROD plan. The clean-up plan of the Cd'A Basin has made necessary improvements since the twenty or so years so far. Surely, the EPA planners could modify the 90 year plan to a 10 year plan. That should be sufficient in order to complete your agenda for the CDA Basin and move on to future endeavors, elsewhere in the United State or global. Mother earth needs

I852-2 all our efforts to restore what natural resources have been threatened and contaminated by greed and ignorance. We must think of the long-term consequences of our decisions and daily actions for the "seventh generation" concept.

Response to comment I852-1
See responses to Comment Nos. I58-1 and I474-2.

Response to comment I852-2
Comment noted.



Let us work together as a team to do what is best for the Coeur d'Alene Basin of the Silver Valley, Shoshone County. There is so much to think about in regards to the natural gravity of surface water flowing downward from the alpine ridges to the source of the South Fork of the Coeur d'Alene River beginning at Look Out Pass, to Mullan and downward to the confluence of the North Fork of the CD'A River at Cataldo, to the Cataldo Slough, the Chain Lakes, Lake Coeur d'Alene and the Spokane River to the Post Falls Dam. I witnessed the great flood of 1974. I was at the gulch where the Galena Mine had its tailing pond at Silverton. I saw the tailing pond burst open spewing the tailings into that area. From the air, in a plane the Silver Valley, from the Cataldo Slough to the Silver Valley looked like a huge lake. There are four tailing ponds built along the south fork, which could burst and spew tailings over Mullan and into the south fork of the CD'A River. It would be "catastrophic" for the communities along the I-90 corridor, the south fork, the sloughs, and downward. The "great flood" could happen again! There is so much to think about. Please reconsider, thank you for your attention to my letter.

La Vonne Pemble
Fourth generation Native of Shoshone County

I852-3

I852-4

Response to comment I852-3

Thank you for your comment.

Response to comment I852-4

Thank you for your comment. See response to Comment No. LJ36-3.

Peretti, Barbara, I721, Letter 618718

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
fnbp624@gmail.com to: formsubmission 11/17/2010 09:19 AM
Sent by: Fnbp624@Gmail.Com <fnbp624=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Barbara Peretti
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. You've been here way too long and the citizens who live and pay taxes here are telling you its time to wrap it up, put a 10 year dead line on this thing, move on and find something else to do.
Coeur d'Alene Basin Resident: Yes
Email Address: fnbp624@gmail.com
Mailing Address: PO Box 250|Kingston|Idaho|83839|US
Phone Number:

I721-1

I721-2

618718

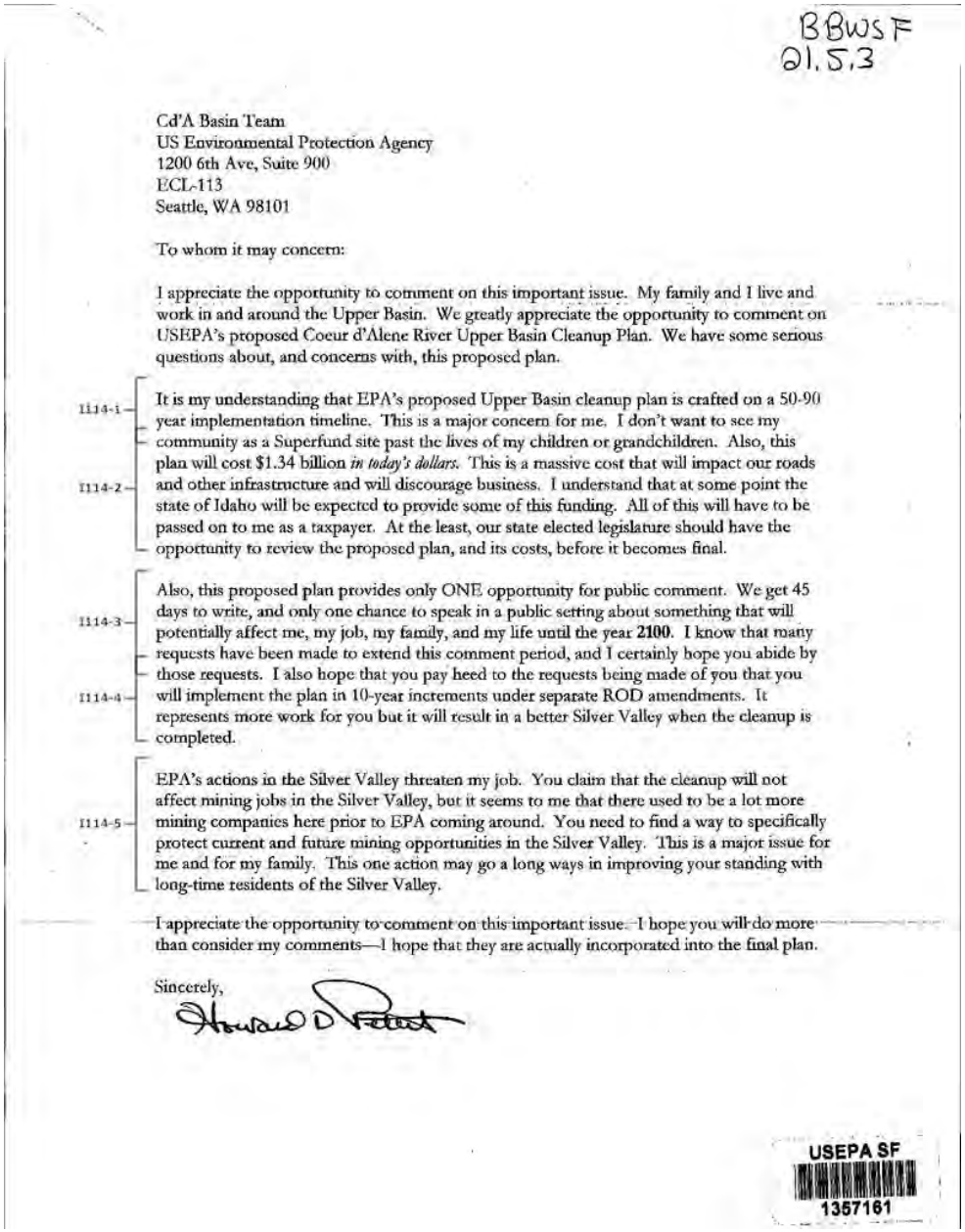
Response to comment I721-1

See response to Comment No. I351-1.

Response to comment I721-2

See responses to Comment Nos. I58-1 and LJ39-5.

Peters, Howard, I114, Letter 1357161



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I114-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I114-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I114-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I114-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I114-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Howard D Peters

USEPA SF
1357161

Response to comment I114-1
See response to Comment No. I58-1.

Response to comment I114-2
See response to Comment No. I58-2.

Response to comment I114-3
See response to Comment No. I58-3.

Response to comment I114-4
See response to Comment No. I58-4.

Response to comment I114-5
See response to Comment No. I58-5.

Peterson, Kenneth, I722, Letter 618719

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
kpeterson3134@comcast.net to: formsubmission 11/19/2010 02:12 PM
Sent by: Kpeterson3134@Comcast.Net <kpeterson3134=comcast.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Kenneth Peterson
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: kpeterson3134@comcast.net
Mailing Address: 3134 Sandy Ridge Drive|Steger|Illinois|60475|US
Phone Number:

I722-1

618719

Response to comment I722-1

See response to Comment No. I351-1.

Petroni, Steve, I271, Letter 616015-35

had to give up coaching baseball. You know why? We didn't have any kids. The EPA ran them out of this valley. They scared so many people, "Oh, there's lead in the water. Don't walk here. Don't step off the path." They told so many visitors that we lost some people coming in here to visit our land. Well, I kind of got sick and tired of that. I'm sick and tired of it now. A lot of people think that we could get another 90 days. I got something to read to you. "We're pretty well fed up gentlemen. Now while I don't speak for all the so-called lead-retarded people in this valley [laughter], I sure echo a lot of thinking ones. We don't want them. We don't need them. Thank you for what you've done. It's a very nice-looking valley now but you haven't solved any health problem, because there wasn't any? Don't forget, retarded votes count [laughter] and vote this year."

Jane Higdem: I'm Jane Higdem. I'm the national president of Women in Mining; 170 women. I'm also one of three Republican delegates for legislative district two, covering five counties. I also own business, some clothing made with pure silver and that I recently, due to lack of sales and my suppliers going out of business, I had to fire myself. Most of the topics that I will be covering tonight will be – I want to hit on the issue of basically the EPA making up its own rules and changing them as they feel. The EPA has limits on the maximum [mineral] contamination that they can discharge. If it's over by some little fraction like .1, they assess a fine to the mining company. If it's over by .2 they assess a fine. They don't have that I can find anywhere, any guidelines or standards for how much does this charge –how much this .1, how much that would cost the company or this. They just kind of make it up as they go and if you don't like it then you can argue it and spend lots of lawyer money, but basically not friendly to mining. If they say they are, how can a mine company stay alive when they fine them to death? Thank you.

Steve Petroni: Good evening. My name is Steve Petroni. I'm Hecla's Silver Valley exploration manager. I'd like to thank the panel for allowing me to present my views tonight. My comments this evening focus on portions of the plan that makes me most nervous about the future of exploration in mining in the Silver Valley. In EPA's cover letter in the proposed plan, they stated and I quote, "EPA has worked with Hecla

I271-1

Civicom – Lower Cost, More Convenient Communications
Page 16 of 43

Response to comment I271-1

See response to Comment No. I58-5.

Mining Company in an effort to develop language that acknowledges the interest in a continued vibrant mining industry." EPA did leap with that well, but I'm offended that they used this language to lead the public to believe that Hecla has total buy-in to the plan. Here's how the US EPA proposes to work with mining companies. On page eight of the planned document, the EPA states and I quote, "US EPA intends to manage its Superfund responsibilities in the Upper Basin in a manner that will allow responsible mining and mineral processing activities as well as exploration and development." This sounds all well and good but here is the issue. The next sentence goes on to say, "Provided that environmental conditions are not exacerbated and the US EPA's ability to implement cleanup is not impeded, EPA expects that future mining-related activities can be conducted in a manner that will not impair or interfere with the implementation of cleanup actions or the protectiveness of implemented cleanup actions." This states that the cleanup is given the highest priority and that mining will only be allowed if it does not interfere with the cleanup activities or the remediated areas. Since our future exploration and mining activities will likely occur in areas in and around the past mining disturbance, EPA would have complete authority to regulate future mining activities. I believe stronger language has to be inserted in the document to ensure that mining companies will be able to work in and around the remediated areas.

1271-1

Franklin McGee: Hello. My name is Franklin McGee. I want to thank you for your time. I'm not a native of Silver Valley but my wife and her family have been here for many years. Most of my friends and family are employed in the mining industry in some way or another. My job at the Lucky Friday is an electrician as well. Most of the jobs created by the mines are good; high-paying jobs with the insurance benefits. I'm worried that the EPA has another agenda that will endanger my job and my wife's job and the jobs of many others. It will affect the whole valley. In the passing months, I've read hundreds of articles from the internet by people who live here and then by people who in live other places; who's right and who's wrong is anybody's guess. Real fact is some of the mistakes out here are [better] than the EPA's and would cost millions, if not a billion less. In these times of economic struggles, I can see this money being

No comments

Petroni, Laurie, I414, Letter 616317

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
smpllp@yahoo.com to: formsubmission 11/11/2010 02:47 PM
Sent by: Smpllp@Yahoo.Com <smpllp=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Laurie Petroni
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I414-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: smpllp@yahoo.com
Mailing Address: 2880 E. Red Cedar Ct.|Coeur d'Alene|ID|83815|US
Phone Number: (208) 930-4561

616317

Response to comment I414-1

See response to Comment No. I351-1.

Petroni, Stephen, I413, Letter 616316

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

spetroni@hecla-mining.com to: formsubmission 11/11/2010 04:04 PM

Sent by: Spetroni@Hecla-Mining.Com <spetroni=hecla-mining.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Stephen Petroni
Date: 11/11/2010

Brief Overview: I am an exploration manager for Hecla Mining Company. My comments in this letter focus on portions of the Plan that make me most nervous about the future of exploration and mining in the Silver Valley. In USEPA's cover letter on the proposed Plan and in recent newspaper
I413-1 advertisements, USEPA stated and I quote "EPA has worked with Hecla Mining Company in an effort to develop language that acknowledges the interest in a continued vibrant mining industry". USEPA did meet with Hecla, but I am offended that you used this language to lead the public to believe that Hecla has total buy in to the Plan.

Here is how the USEPA "plans" to work with the mining companies: On page Roman Numeral VIII of the Plan Document, the USEPA states and I quote "USEPA intends to manage its Superfund responsibilities in the Upper Basin in a manner that will allow for responsible mining and mineral processing activities as well as exploration and development." This sounds all well and good….but here is the issue. The next sentence goes on to say "Provided that environmental conditions are not exacerbated and that USEPA's ability to implement cleanup is not impeded, USEPA expects that future mining-related
I413-2 activities can be conducted in a manner that will not impair or interfere with the implementation of cleanup actions or the protectiveness of any implemented cleanup actions."

This states that the cleanup is given the highest priority and mining will only be allowed if it does not interfere with the cleanup activities or the remediated areas. Since our future exploration and mining activities are likely to occur in and around areas with past mining disturbance, USEPA would have complete authority to regulate future mining activities.

I413-3 I believe stronger language has to be inserted in the document to ensure that mining companies will be able to work in and around remediated areas.

A second point I would like to make is that Hecla's surface sampling programs show broad areas of lead and zinc concentrations that are in areas with no mining disturbance. These concentrations are not contamination caused by mining; but rather, they are a reflection of the natural mineralization within the mining district. On pages 3-2 and 3-3 of the Plan, USEPA lists several sources of the contamination; but, nowhere on the list do you acknowledge
I413-4 natural contamination. How can USEPA overlook the contribution from

616316

Response to comment I413-1

See response to Comment No. I58-5.

Response to comment I413-2

See response to Comment No. I58-5.

Response to comment I413-3

See response to Comment No. I58-5.

Response to comment I413-4

See response to Comment No. LC33-8.

I413-4

non-mining related mineralization?

The USEPA plan includes the construction of 59 miles of pipeline to move as much as 19,000 gallons of groundwater per minute to the treatment plant in Kellogg, which would require major upgrades to handle the increased volume of water. At low flow conditions, this plan could eliminate all flows in Canyon Creek, reduce the South Fork itself above Wallace up to 78% and reduce flows

I413-5 in the South Fork at Elizabeth Park up to 48%. Draw downs and construction activity of this magnitude would have a serious, negative effect on the streams (including water temperature), the streambeds and the fish and other aquatic life that EPA claims it is trying to protect. Not only that, this plan ensures perpetual water treatment because it does nothing to remove the contaminants at their source.

I support the 10-Year plan proposed by Citizens for a Prosperous Silver Valley. This plan is shorter-term, more affordable, and has a greater chance of success.

- The 10-Year Plan:
  - Would cost only $150 - $175 million.
  - Is based on actual data
  - Includes remedy protection in towns and populated areas
  - Includes a $2 million study to support flood control in the Valley
  - Allows multiple opportunities for meaningful public input
  - Focuses on priority sources of zinc loading above Wallace

I413-6 (Canyon/Nine Mile creeks) and in the "Box"

  - Will not dewater the Coeur d'Alene River
  - Establishes achievable goals and benchmarks
  - Will not require massive treatment plant upgrades
  - Respects existing private property rights, water rights and states' rights
  - Protects current and future economic development, including mining and land-use opportunities in the Silver Valley
  - Requires no additional repositories
  - Improves fisheries through site-specific actions and proven technologies
  - Improves water quality standards more quickly and at less cost
  - Is best for the Valley, its residents and for Idaho
  - Is a better way!

Sincerely,

Stephen M. Petroni
My Concerns:
Additional Comments:
Coeur d'Alene Basin Resident: Yes
Email Address: spetroni@hecla-mining.com
Mailing Address: 2880 E. Red Cedar Ct.|Coeur d'Alene|Idaho|83815|US
Phone Number: (208) 769-4103

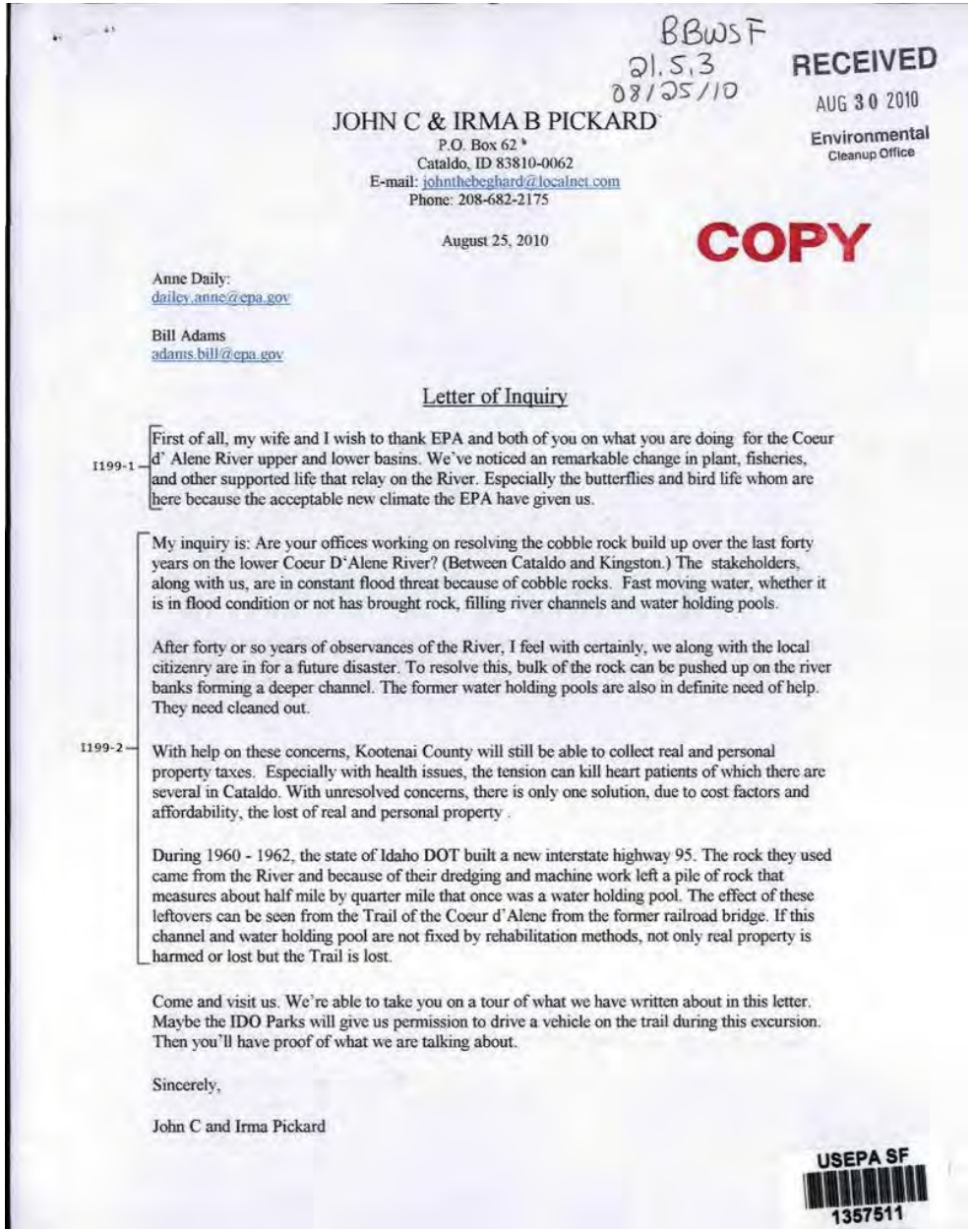
Response to comment I413-5

See response to Comment I58-1 regarding the reduction in scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. I54-8 regarding potential stream flow reduction due to water treatment.

Response to comment I413-6

See response Comment No. I474-2.

Pickard, Irma; Pickard, John C., I199, Letter 1357511



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21.5.3
08/25/10

RECEIVED
AUG 30 2010
Environmental
Cleanup Office

JOHN C & IRMA B PICKARD
P.O. Box 62
Cataldo, ID 83810-0062
E-mail: johnthebeghard@localnet.com
Phone: 208-682-2175

August 25, 2010

COPY

Anne Daily:
dailey.anne@epa.gov

Bill Adams
adams.bill@epa.gov

Letter of Inquiry

I199-1 First of all, my wife and I wish to thank EPA and both of you on what you are doing for the Coeur d' Alene River upper and lower basins. We've noticed an remarkable change in plant, fisheries, and other supported life that relay on the River. Especially the butterflies and bird life whom are here because the acceptable new climate the EPA have given us.

My inquiry is: Are your offices working on resolving the cobble rock build up over the last forty years on the lower Coeur D'Alene River? (Between Cataldo and Kingston.) The stakeholders, along with us, are in constant flood threat because of cobble rocks. Fast moving water, whether it is in flood condition or not has brought rock, filling river channels and water holding pools.

After forty or so years of observances of the River, I feel with certainly, we along with the local citizenry are in for a future disaster. To resolve this, bulk of the rock can be pushed up on the river banks forming a deeper channel. The former water holding pools are also in definite need of help. They need cleaned out.

I199-2 With help on these concerns, Kootenai County will still be able to collect real and personal property taxes. Especially with health issues, the tension can kill heart patients of which there are several in Cataldo. With unresolved concerns, there is only one solution, due to cost factors and affordability, the lost of real and personal property .

During 1960 - 1962, the state of Idaho DOT built a new interstate highway 95. The rock they used came from the River and because of their dredging and machine work left a pile of rock that measures about half mile by quarter mile that once was a water holding pool. The effect of these leftovers can be seen from the Trail of the Coeur d'Alene from the former railroad bridge. If this channel and water holding pool are not fixed by rehabilitation methods, not only real property is harmed or lost but the Trail is lost.

Come and visit us. We're able to take you on a tour of what we have written about in this letter. Maybe the IDO Parks will give us permission to drive a vehicle on the trail during this excursion. Then you'll have proof of what we are talking about.

Sincerely,

John C and Irma Pickard

USEPA SF
1357511

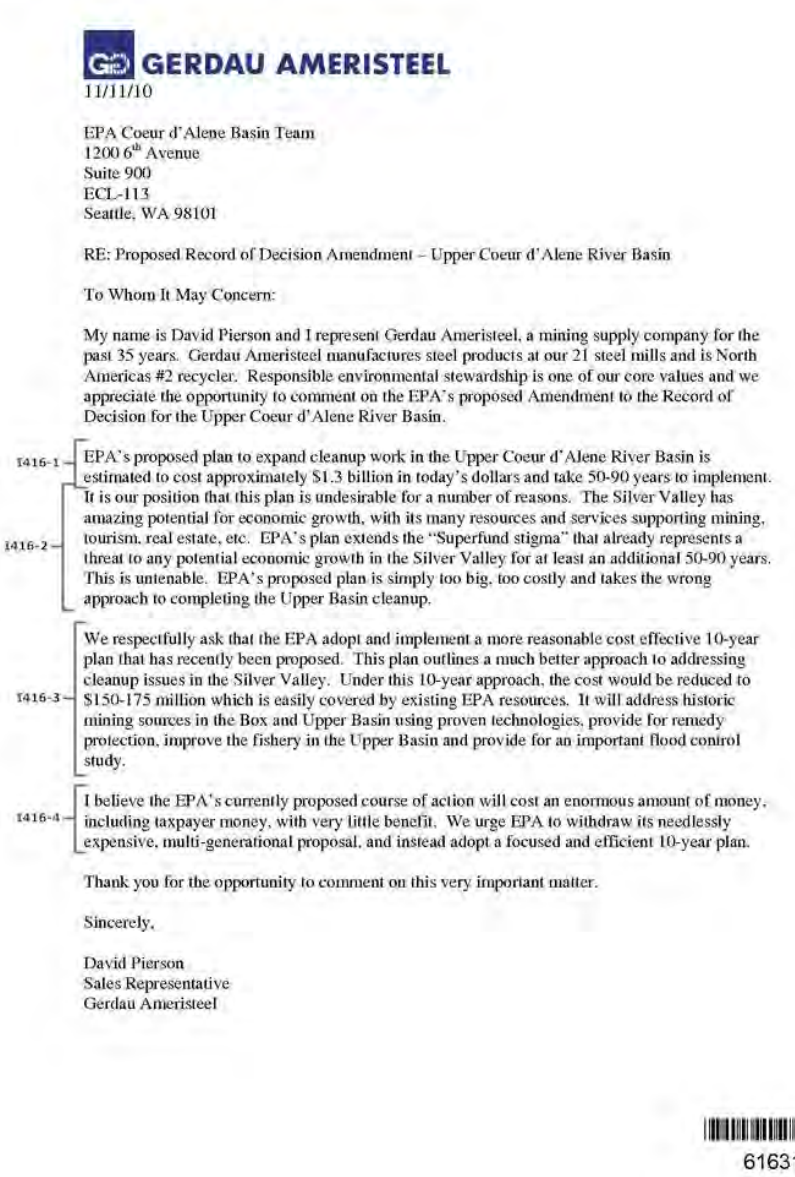
Response to comment I199-1

Thank you for your comment.

Response to comment I199-2

The Lower Coeur d'Alene Basin is not within the scope of the Selected Remedy. Flooding and recontamination are complex and significant issues in the Lower Basin. EPA is continuing to collect data in the Lower Basin and perform analyses to provide decision-makers with an improved understanding of the Lower Basin and to support evaluations of remedial alternatives which could include dredging projects and shoreline protection to mitigate the effects of recontamination due to flooding. EPA is working with the Lower Basin Collaborative as we move forward with developing cleanup options for the Lower Basin. The Lower Basin Collaborative is open to all citizens interested in Lower Basin issues and we encourage your participation.

Pierson, Dave, I416, Letter 616319



GERDAU AMERISTEEL

11/11/10

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

My name is David Pierson and I represent Gerdau Ameristeel, a mining supply company for the past 35 years. Gerdau Ameristeel manufactures steel products at our 21 steel mills and is North Americas #2 recycler. Responsible environmental stewardship is one of our core values and we appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I416-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement.

I416-2 It is our position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I416-3 We respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I416-4 I believe the EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. We urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

David Pierson
Sales Representative
Gerdau Ameristeel

616319

Response to comment I416-1

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I416-2

See response to Comment No. I474-1.

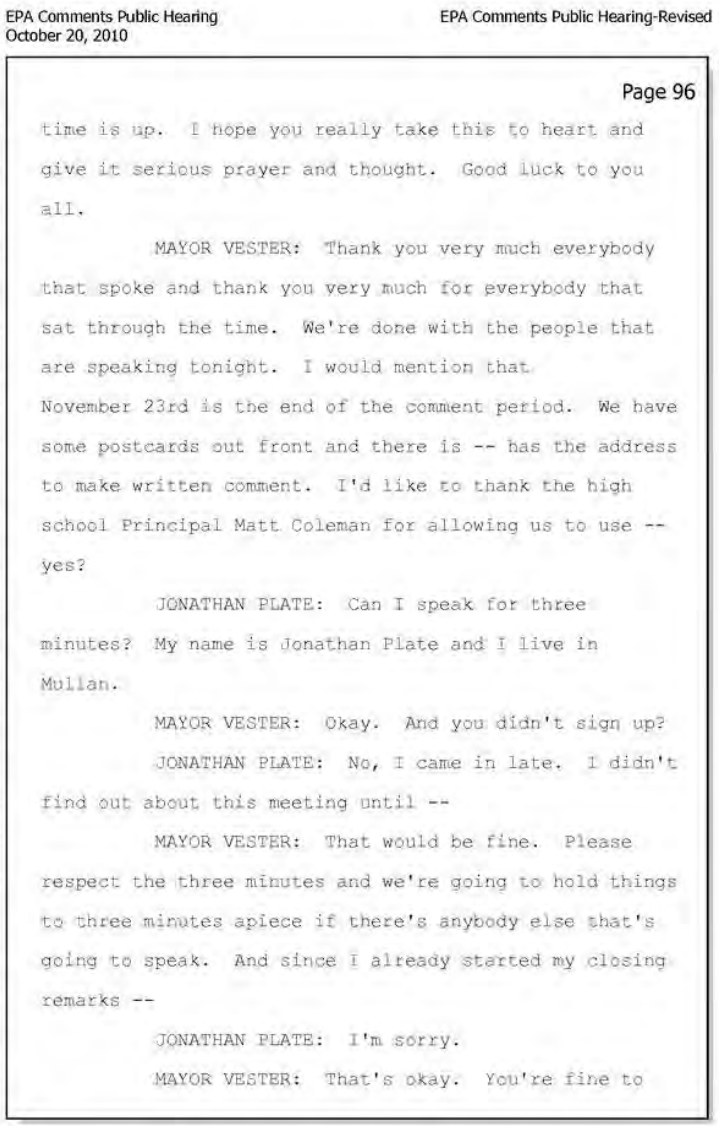
Response to comment I416-3

See response to Comment No. I474-2.

Response to comment I416-4

See response to Comment No. I474-2.

Plate, Jonathan, I904, Letter 619651-39



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October 20, 2010

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time is up. I hope you really take this to heart and give it serious prayer and thought. Good luck to you all.

MAYOR VESTER: Thank you very much everybody that spoke and thank you very much for everybody that sat through the time. We're done with the people that are speaking tonight. I would mention that November 23rd is the end of the comment period. We have some postcards out front and there is -- has the address to make written comment. I'd like to thank the high school Principal Matt Coleman for allowing us to use -- yes?

JONATHAN PLATE: Can I speak for three minutes? My name is Jonathan Plate and I live in Mullan.

MAYOR VESTER: Okay. And you didn't sign up?

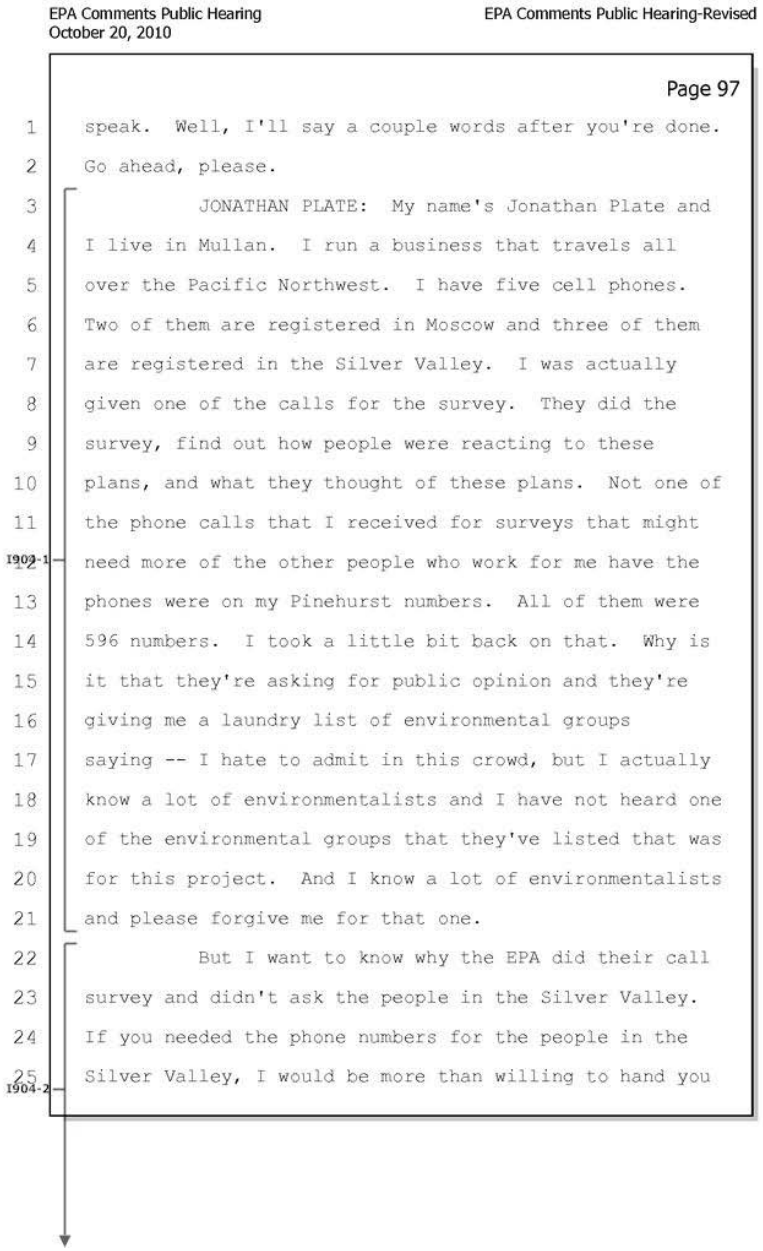
JONATHAN PLATE: No, I came in late. I didn't find out about this meeting until --

MAYOR VESTER: That would be fine. Please respect the three minutes and we're going to hold things to three minutes apiece if there's anybody else that's going to speak. And since I already started my closing remarks --

JONATHAN PLATE: I'm sorry.

MAYOR VESTER: That's okay. You're fine to

No comments



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speak. Well, I'll say a couple words after you're done. Go ahead, please.

JONATHAN PLATE: My name's Jonathan Plate and I live in Mullan. I run a business that travels all over the Pacific Northwest. I have five cell phones. Two of them are registered in Moscow and three of them are registered in the Silver Valley. I was actually given one of the calls for the survey. They did the survey, find out how people were reacting to these plans, and what they thought of these plans. Not one of the phone calls that I received for surveys that might need more of the other people who work for me have the phones were on my Pinehurst numbers. All of them were 596 numbers. I took a little bit back on that. Why is it that they're asking for public opinion and they're giving me a laundry list of environmental groups saying -- I hate to admit in this crowd, but I actually know a lot of environmentalists and I have not heard one of the environmental groups that they've listed that was for this project. And I know a lot of environmentalists and please forgive me for that one.

But I want to know why the EPA did their call survey and didn't ask the people in the Silver Valley. If you needed the phone numbers for the people in the Silver Valley, I would be more than willing to hand you

I904-1

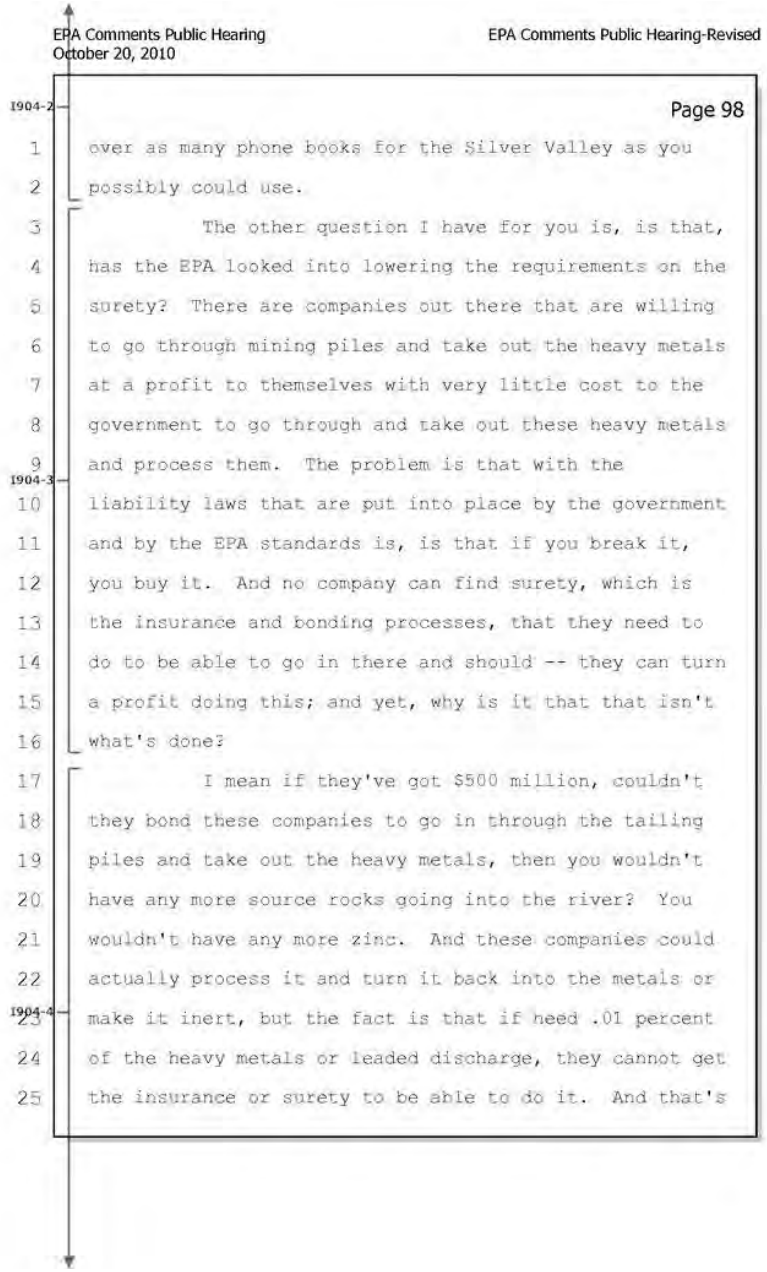
I904-2

Response to comment I904-1

EPA did not conduct polling calls or surveys of any kind in association with this decision-making process. Thank you for your comment.

Response to comment I904-2

Thank you for your comment. EPA did not conduct polling calls or surveys of any kind during this decision-making process.



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1904-2

over as many phone books for the Silver Valley as you possibly could use.

The other question I have for you is, is that, has the EPA looked into lowering the requirements on the surety? There are companies out there that are willing to go through mining piles and take out the heavy metals at a profit to themselves with very little cost to the government to go through and take out these heavy metals and process them. The problem is that with the

1904-3

liability laws that are put into place by the government and by the EPA standards is, is that if you break it, you buy it. And no company can find surety, which is the insurance and bonding processes, that they need to do to be able to go in there and should -- they can turn a profit doing this; and yet, why is it that that isn't what's done?

I mean if they've got $500 million, couldn't they bond these companies to go in through the tailing piles and take out the heavy metals, then you wouldn't have any more source rocks going into the river? You wouldn't have any more zinc. And these companies could actually process it and turn it back into the metals or

1904-4

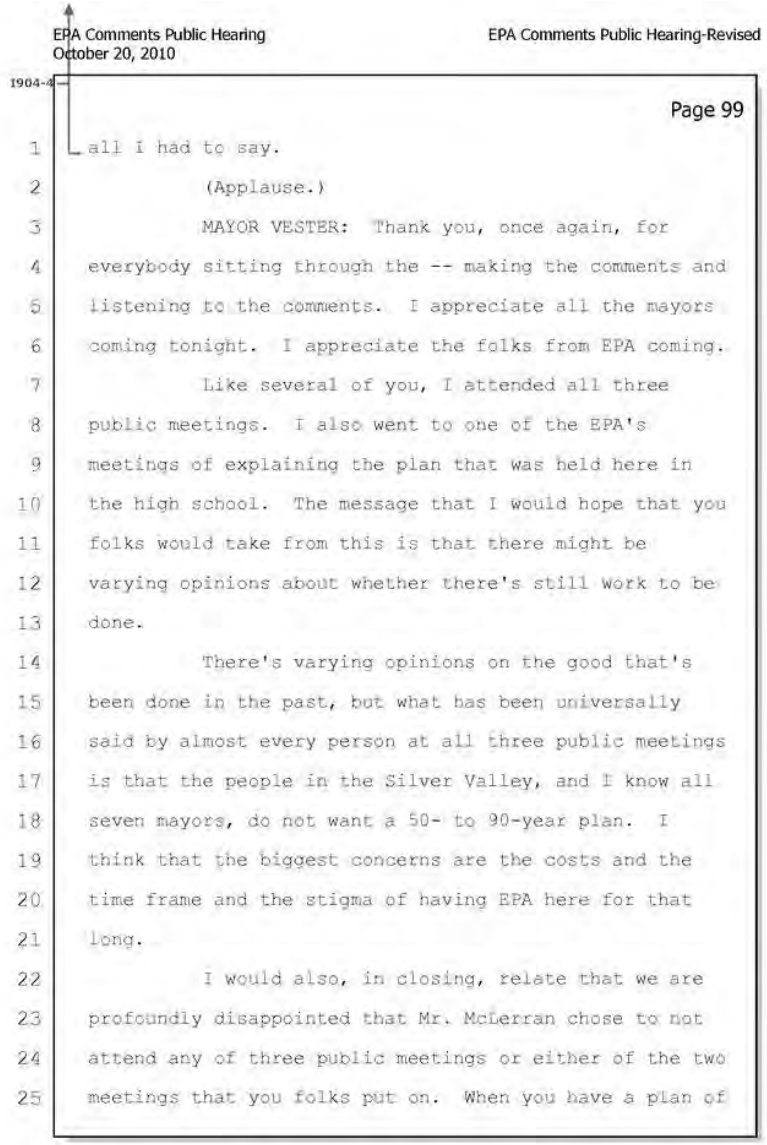
make it inert, but the fact is that if need .01 percent of the heavy metals or leaded discharge, they cannot get the insurance or surety to be able to do it. And that's

Response to comment I904-3

The Selected Remedy does not preclude reprocessing of mine wastes by a private entity. However, such reprocessing must be performed in compliance with federal and state law. Issues related surety bonds or financing such an activity are well outside the scope of the Selected Remedy.

Response to comment I904-4

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediment, groundwater, and surface water that poses risks to people, wildlife, and the environment. Although there is substantial contamination throughout the Upper Basin, in many cases the metals loading is due to dissolved phase metals in groundwater or surface water. It would not be feasible to process these dissolved phase metals that pose risks to human health and the environment.



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all I had to say.

(Applause.)

MAYOR VESTER: Thank you, once again, for everybody sitting through the -- making the comments and listening to the comments. I appreciate all the mayors coming tonight. I appreciate the folks from EPA coming.

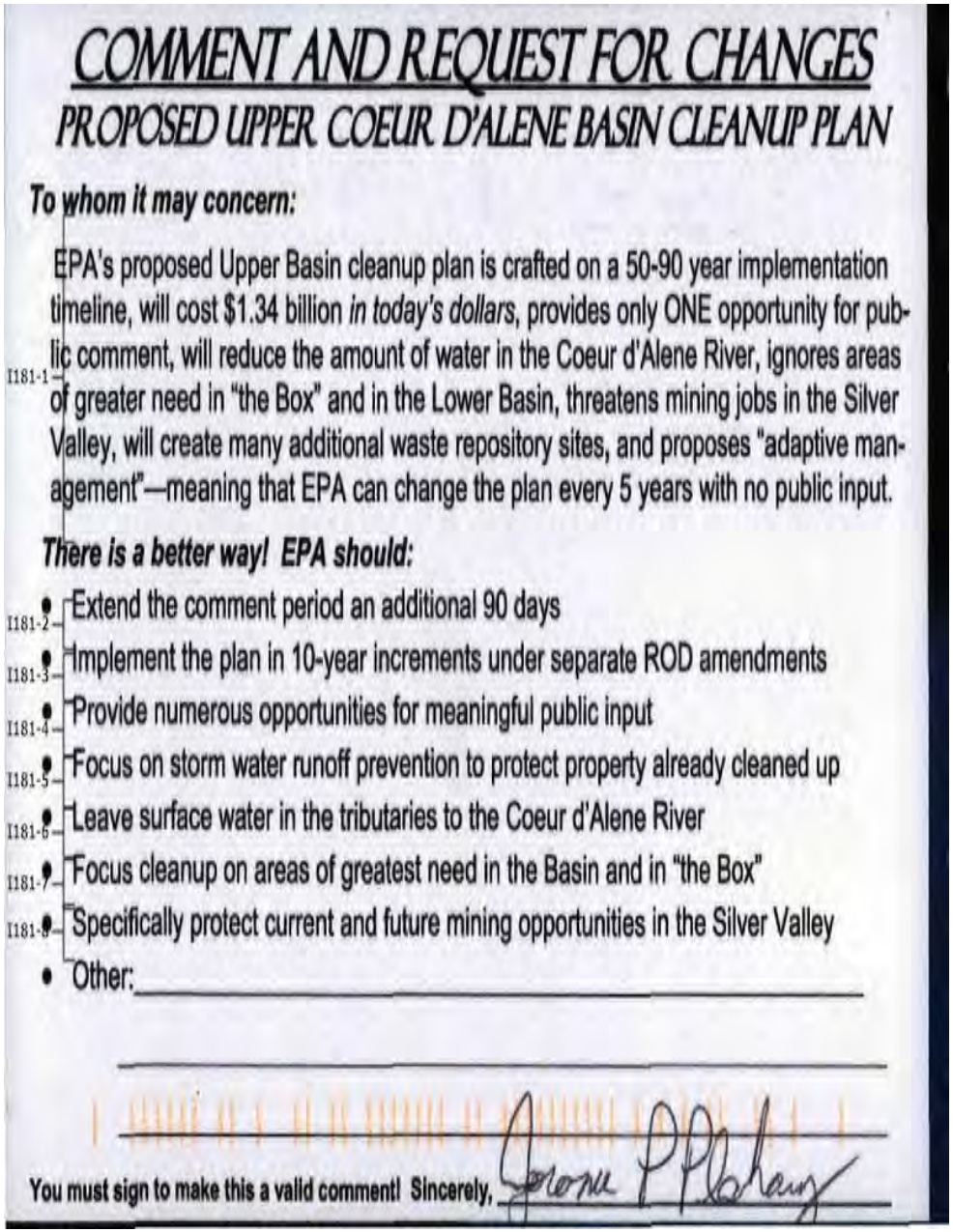
Like several of you, I attended all three public meetings. I also went to one of the EPA's meetings of explaining the plan that was held here in the high school. The message that I would hope that you folks would take from this is that there might be varying opinions about whether there's still work to be done.

There's varying opinions on the good that's been done in the past, but what has been universally said by almost every person at all three public meetings is that the people in the Silver Valley, and I know all seven mayors, do not want a 50- to 90-year plan. I think that the biggest concerns are the costs and the time frame and the stigma of having EPA here for that long.

I would also, in closing, relate that we are profoundly disappointed that Mr. McCerran chose to not attend any of three public meetings or either of the two meetings that you folks put on. When you have a plan of

No comments

Ploharz, Jerry, I181, Letter 1357404



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I181-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I181-2 Extend the comment period an additional 90 days
- I181-3 Implement the plan in 10-year increments under separate ROD amendments
- I181-4 Provide numerous opportunities for meaningful public input
- I181-5 Focus on storm water runoff prevention to protect property already cleaned up
- I181-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I181-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I181-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Jerome P Ploharz

Response to comment I181-1
See response to Comment No. I25-1.

Response to comment I181-2
See response to Comment No. I25-2.

Response to comment I181-3
See response to Comment No. I25-3.

Response to comment I181-4
See response to Comment No. I25-4.

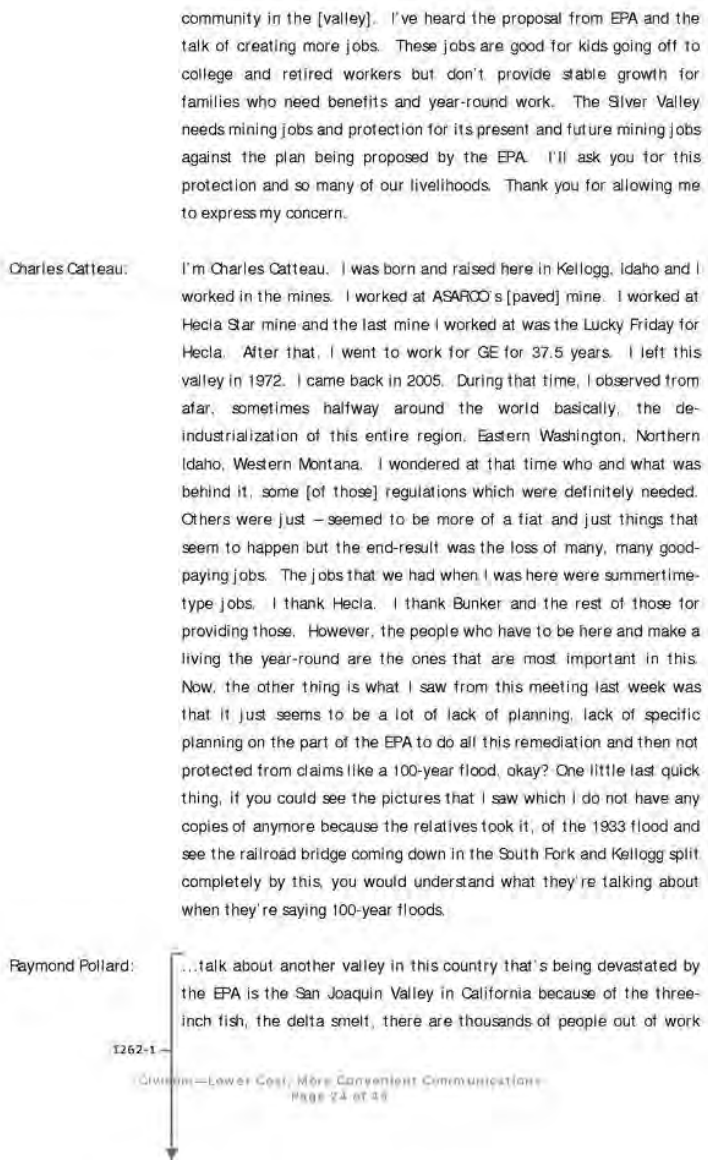
Response to comment I181-5
See response to Comment No. I25-5.

Response to comment I181-6
See response to Comment No. I25-6.

Response to comment I181-7
See response to Comment No. I25-7.

Response to comment I181-8
See response to Comment No. I25-8.

Pollard, Raymond, I262, Letter 616015-25



community in the [valley]. I've heard the proposal from EPA and the talk of creating more jobs. These jobs are good for kids going off to college and retired workers but don't provide stable growth for families who need benefits and year-round work. The Silver Valley needs mining jobs and protection for its present and future mining jobs against the plan being proposed by the EPA. I'll ask you for this protection and so many of our livelihoods. Thank you for allowing me to express my concern.

Charles Catteau: I'm Charles Catteau. I was born and raised here in Kellogg, Idaho and I worked in the mines. I worked at ASARCO's [paved] mine. I worked at Hecla Star mine and the last mine I worked at was the Lucky Friday for Hecla. After that, I went to work for GE for 37.5 years. I left this valley in 1972. I came back in 2005. During that time, I observed from afar, sometimes halfway around the world basically, the de-industrialization of this entire region. Eastern Washington, Northern Idaho, Western Montana. I wondered at that time who and what was behind it, some [of those] regulations which were definitely needed. Others were just – seemed to be more of a fiat and just things that seem to happen but the end-result was the loss of many, many good-paying jobs. The jobs that we had when I was here were summertime-type jobs. I thank Hecla. I thank Bunker and the rest of those for providing those. However, the people who have to be here and make a living the year-round are the ones that are most important in this. Now, the other thing is what I saw from this meeting last week was that it just seems to be a lot of lack of planning, lack of specific planning on the part of the EPA to do all this remediation and then not protected from claims like a 100-year flood, okay? One little last quick thing, if you could see the pictures that I saw which I do not have any copies of anymore because the relatives took it, of the 1933 flood and see the railroad bridge coming down in the South Fork and Kellogg split completely by this, you would understand what they're talking about when they're saying 100-year floods.

Raymond Pollard: ...talk about another valley in this country that's being devastated by the EPA is the San Joaquin Valley in California because of the three-inch fish, the delta smelt, there are thousands of people out of work

I262-1

Civitium—Lower Cost, More Convenient Communications
Page 24 of 26

Response to comment I262-1

Thank you for your comment. Also see response to Comment No. I54-8.

I262-1

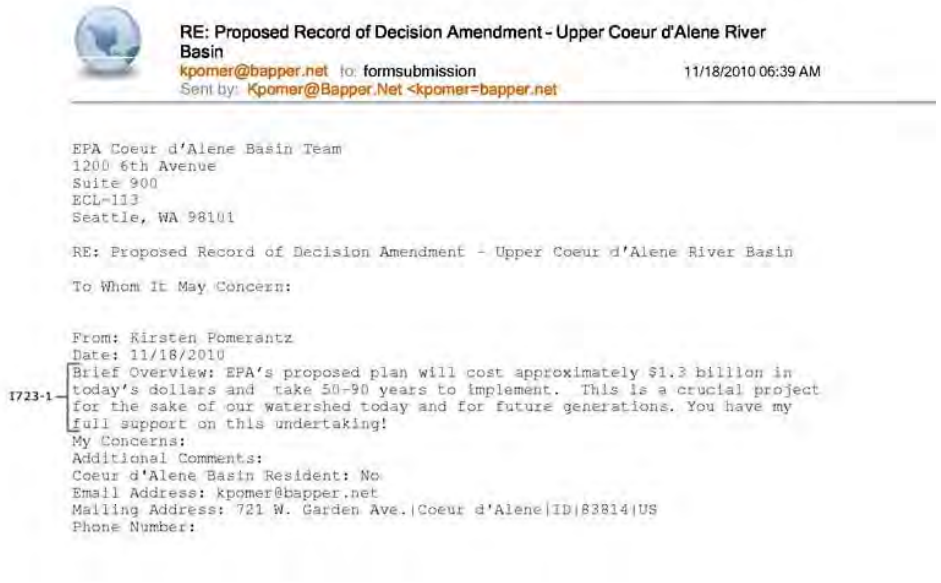
right now as we are talking because they are farmers and their water's been taken away from them. I know that water is important to this valley. I know it's important to mining and I do not want to see a bureaucratic system come in and basically run at least my friends and my family out of work. I just returned to this community about three weeks ago. I'm going to live here. I'm going to stay here and I've seen the devastation that the EPA caused in California and there is no [need for us]. They say they listen. These farmers have been begging for water and they haven't gotten it. They don't listen. They don't care. 1200 Pennsylvania Avenue is too far away from this part of the world. We need them out of here and controlled by the local government. That's it.

Hap Butler: My name is Hap Butler. I live in Pinehurst. Thank you, Senator Crapo, for calling this county hall meeting. Thank you, Governor Otter, for coming up here from Boise. I know it took time out of your day, and thank you, Chief Allan, for coming to be with us. I appreciate that more than you might imagine. Mr. Opalski, I expect the people might be a less cynical but the EPA's going just to listen to our comments and concerns. If we ever say the EPA pay any attention to anything anybody has ever said – I give you the example, the toxic waste site that you dumped out of here on the Cataldo Flat despite considerable opposition from this community. You didn't listen to a single thing that we said. [Applause] Now does that tell us how you listen to anything else we say? I just wonder about that. Senator Crapo, as Senator Risch so correctly pointed out, the EPA has not proposed how to wind down in their project here rather, they are coming back with a proposal that say two to three times [at longs] they've already been here so far. Nothing! Absolutely nothing lasts forever with the exception of an unelected federal agency. I urge you, Senator, and Governor, to do every single thing in your power to show the EPA the clearly marked exit from the Silver Valley and [the can]. They're not going to do anything further here. They run this like a business. They come forward with benchmarks. They come forward with time pranks and they keep them reasonable and they keep them affordable. Thank you.

Bill Mooney: Yes, my name is Bill Mooney.

No comments

Pomerantz, Kristen, I723, Letter 618720



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
kpomer@bapper.net to: formsubmission 11/18/2010 06:39 AM
Sent by: Kpomer@Bapper.Net <kpomer=bapper.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

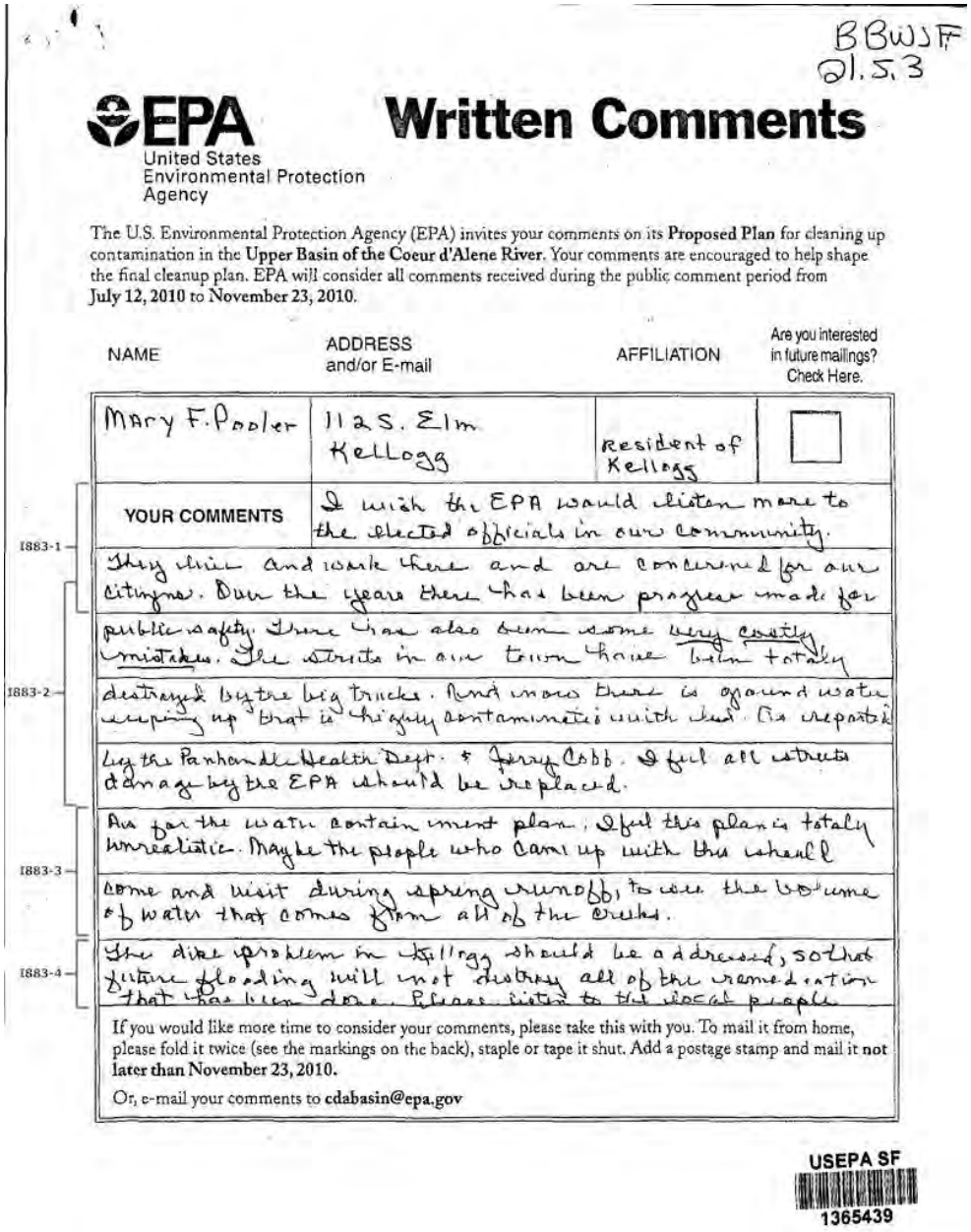
From: Kirsten Pomerantz
Date: 11/18/2010
I723-1 Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This is a crucial project for the sake of our watershed today and for future generations. You have my full support on this undertaking!
My Concerns:
Additional Comments:
Coeur d'Alene Basin Resident: No
Email Address: kpomer@bapper.net
Mailing Address: 721 W. Garden Ave.|Coeur d'Alene|ID|83814|US
Phone Number:

618720

Response to comment I723-1

Comment noted. See response to Comment No. I58-1.

Pooler, Mary F., I883, Letter 1365439



BBWJF
21.5.3

EPA United States Environmental Protection Agency

Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **November 23, 2010.**

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Mary F. Pooler	1125. Elm Kellogg	Resident of Kellogg	☐

YOUR COMMENTS

I883-1 I wish the EPA would listen more to the elected officials in our community. They live and work there and are concerned for our citizens. Over the years there has been progress made for public safety. There has also been some very costly mistakes. The streets in our town have been totally

I883-2 destroyed by the big trucks. And more there is ground water seeping up that is highly contaminated with lead. Its repaired by the Panhandle Health Dept. & Jerry Cobb. I feel all streets damage by the EPA should be replaced.

I883-3 As for the water containment plan. I feel this plan is totaly unrealistic. Maybe the people who came up with this should come and visit during spring runoff, to see the volume of water that comes from all of the creeks.

I883-4 The dike problem in Kellogg should be addressed, so that future flooding will not destroy all of the remediation that has been done. Please listen to the local people

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than November 23, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1365439

Response to comment I883-1

See responses to Comment Nos. I295-2 and LJ39-5.

Response to comment I883-2

The Selected Remedy includes estimated costs for constructing roads to access sites and to repair damage to existing roads due to cleanup activities. In addition, EPA and IDEQ recognize that some pre-existing paved roadways may not provide adequate long-term barriers to underlying contaminated material, and that local and state entities are responsible for the long-term road development and maintenance efforts. As a result, the agencies are developing an approach under the existing RODs to address this issue collaboratively with local, county, and state entities responsible for providing and maintaining roadways in their communities. The objective of this effort is to develop and implement a strategy that ensures the long-term effectiveness of barriers installed in right of ways, and also aligns with the transportation and maintenance needs of the Box and Basin communities.

Response to comment I883-3

The contaminated water that will be collected for treatment consists of adit discharges throughout the Upper Basin and groundwater in the vicinity of the Bunker Hill Box, Osburn, and Woodland Park. The flow rate of collected water will change seasonally but not at the extremes with which surface water flows change (i.e., spring runoff). The collection and treatment systems will be designed to accommodate a maximum flow rate and if flows exceed that maximum flow rate under extreme weather events, a portion of the flow will bypass the collection system and will not be collected.

Response to comment I883-4

EPA is eager to ensure the long-term performance of the Selected Human Health Remedies. EPA is therefore committed to working with local, state, and federal entities with an interest in SFCDR flood issues and, consistent with EPA's authority, to help craft solutions. EPA can and will contribute to efforts to understand SFCDR flooding and, if these efforts identify actions that will meet Superfund remedy requirements, EPA will define and select these activities in future decision documents. CERCLA requires that EPA's contribution to flood control work must have a direct connection to the CERCLA remedy.

No comments

Fw: PP Comment
Andrea Lindsay to: cdabasin 11/22/2010 08:58 AM
Cc: Anne McCauley

Just in case this message did not reach the comment mailbox, I am sending it again. (The mailbox address did not appear to be complete.)

****

Andrea Lindsay
Community Involvement Coordinator
EPA, 1200 6th Avenue, Suite 900
Seattle, WA 98101
206/553-1896
Work days: Mon, Thurs, Fri

Sign up for EPA R10's Water News Listserv at
www.epa.gov/r10earth/watertalk.htm

---- Forwarded by Andrea Lindsay/R10/USEPA/US on 11/22/2010 08:56 AM ----

From: <Denna.Grangaard@deq.idaho.gov>
To: CDABasin@EPA
Cc: Andrea Lindsay/R10/USEPA/US@EPA, <terry_sharp@usamedia.tv>
Date: 11/22/2010 08:55 AM
Subject: PP Comment

Forwarding to EPA on behalf of a citizen who gave their single-page comment letter to my office for submittal.

Thank you for your sincere consideration,

Denna Grangaard
Public Outreach Analyst
Idaho Department of Environmental Quality
Office of Remediation
1005 West McKinley Ave.
Kellogg, Idaho 83837
(208) 783-5781

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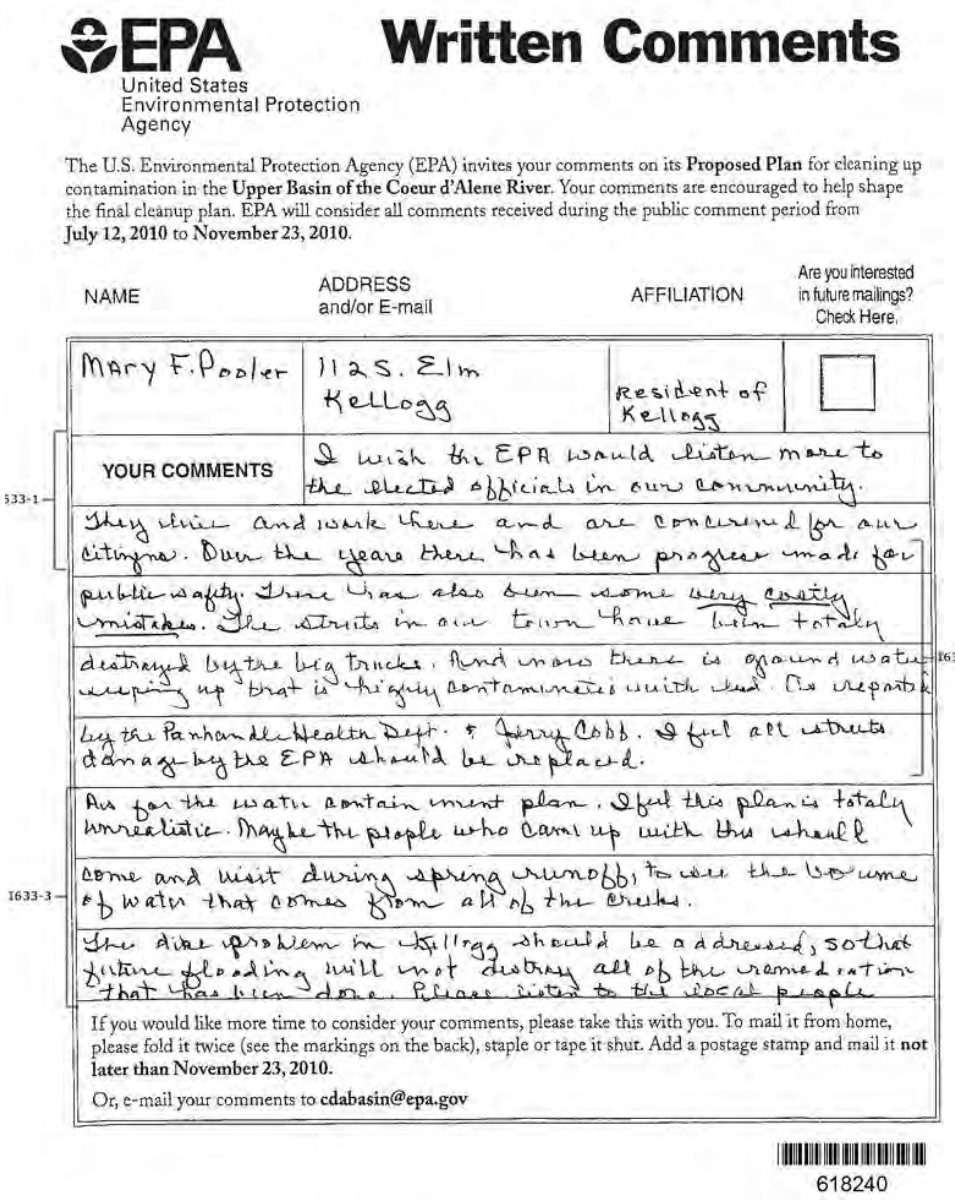
Pooler, Mary, I633, Letter 618240



EPA United States Environmental Protection Agency

Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **November 23, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Mary F. Pooler	1125. Elm Kellogg	Resident of Kellogg	☐

YOUR COMMENTS

I633-1 I wish the EPA would listen more to the elected officials in our community. They live and work here and are concerned for our citizens. Over the years there has been progress made for public safety. There has also been some very costly mistakes. The streets in our town have been totally destroyed by the big trucks. And more there is ground water seeping up that is highly contaminated with lead. The repair by the Panhandle Health Dept. & Jerry Cobb. I feel all streets damage by the EPA should be replaced.

I633-2

As for the water containment plan. I feel this plan is totally unrealistic. Maybe the people who came up with this should

I633-3 come and visit during spring runoff, to see the volume of water that comes from all of the creeks.

The dike problem in Kellogg should be addressed, so that future flooding will not destroy all of the remediation that has been done. Please listen to the local people.

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than November 23, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

618240

Response to comment I633-1

EPA is obligated to make sound scientific decisions and is dedicated to its mission to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. Also see responses to Comment Nos. I295-2 and LJ39-5.

Response to comment I633-2

The Selected Remedy includes estimated costs for constructing roads to access sites and to repair damage to existing roads due to cleanup activities. In addition, EPA and IDEQ recognize that some pre-existing paved roadways may not provide adequate long-term barriers to underlying contaminated material, and that local and state entities are responsible for the long-term road development and maintenance efforts. As a result, the agencies are developing an approach under the existing RODs to address this issue collaboratively with local, county, and state entities responsible for providing and maintaining roadways in their communities. The objective of this effort is to develop and implement a strategy that ensures the long-term effectiveness of barriers installed in ROWs, and also aligns with the transportation and maintenance needs of the Box and Basin communities.

Response to comment I633-3

See response to Comment No. I54-8 regarding stream flow reduction. See response to Comment No. LJ36-3 regarding flooding concerns.

Pope, Sandra, I724, Letter 618721

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
sspope@usamedia.tv to: formsubmission 11/18/2010 11:24 AM
Sent by: Sspope@Usamedia.Tv <sspope=usamedia.tv

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Sandra Pope
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. Mother Nature put the lead and zinc in this valley -- that is why it is such a productive mining area. No amount of money or years will help the EPA get rid of all of it, which seems to be their intention.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. It will cost much less and use those funds in a much more efficient manner. It will also give some consideration to those of us who live and work here. We need to have some certainty to be able to plan for our future.
Coeur d'Alene Basin Resident: Yes
Email Address: sspope@usamedia.tv
Mailing Address: 302 Orchard Avenue|Silverton|Idaho|83867|US
Phone Number:

I724-1
I724-2

618721

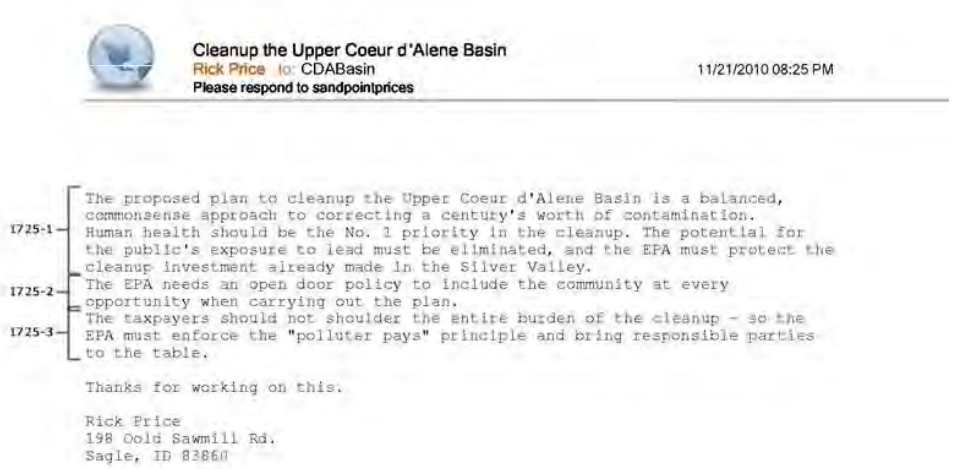
Response to comment I724-1

See response to Comment No. I351-1.

Response to comment I724-2

See response to Comment No. 1474-2.

Price, Rick, I725, Letter 618722



Cleanup the Upper Coeur d'Alene Basin
Rick Price to: CDABasin 11/21/2010 08:25 PM
Please respond to sandpointprices

I725-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I725-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I725-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Thanks for working on this.

Rick Price
198 Oold Sawmill Rd.
Sagle, ID 83860

Response to comment I725-1

See response to Comment No. I295-1.

Response to comment I725-2

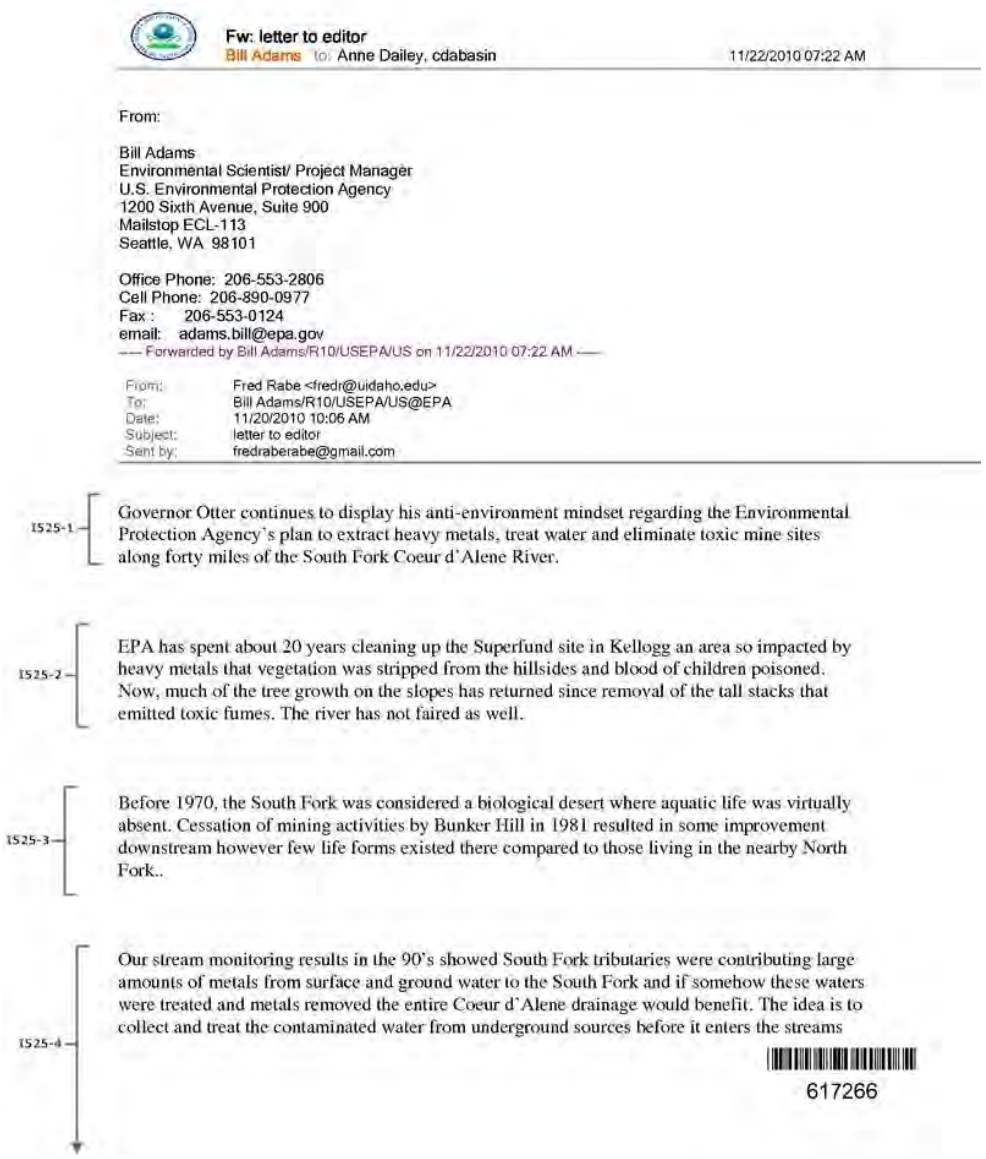
See response to Comment No. I295-2.

Response to comment I725-3

See response to Comment No. I295-3.

618722

Rabe, Fred, I525, Letter 617266



Fw: letter to editor
Bill Adams to: Anne Dailey, cdabasin 11/22/2010 07:22 AM

From:

Bill Adams
Environmental Scientist/ Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Mailstop ECL-113
Seattle, WA 98101

Office Phone: 206-553-2806
Cell Phone: 206-890-0977
Fax : 206-553-0124
email: adams.bill@epa.gov
--- Forwarded by Bill Adams/R10/USEPA/US on 11/22/2010 07:22 AM ---

From: Fred Rabe <fredr@uidaho.edu>
To: Bill Adams/R10/USEPA/US@EPA
Date: 11/20/2010 10:06 AM
Subject: letter to editor
Sent by: fredraberabe@gmail.com

I525-1 Governor Otter continues to display his anti-environment mindset regarding the Environmental Protection Agency's plan to extract heavy metals, treat water and eliminate toxic mine sites along forty miles of the South Fork Coeur d'Alene River.

I525-2 EPA has spent about 20 years cleaning up the Superfund site in Kellogg an area so impacted by heavy metals that vegetation was stripped from the hillsides and blood of children poisoned. Now, much of the tree growth on the slopes has returned since removal of the tall stacks that emitted toxic fumes. The river has not faired as well.

I525-3 Before 1970, the South Fork was considered a biological desert where aquatic life was virtually absent. Cessation of mining activities by Bunker Hill in 1981 resulted in some improvement downstream however few life forms existed there compared to those living in the nearby North Fork..

I525-4 Our stream monitoring results in the 90's showed South Fork tributaries were contributing large amounts of metals from surface and ground water to the South Fork and if somehow these waters were treated and metals removed the entire Coeur d'Alene drainage would benefit. The idea is to collect and treat the contaminated water from underground sources before it enters the streams

617266

Response to comment I525-1
Thank you for your comment.

Response to comment I525-2
Thank you for your comment.

Response to comment I525-3
Thank you for your comment.

Response to comment I525-4
Thank you for your comment.

I525-4 and rivers.

I525-5 The Republican governor however is not in favor of EPA's projects since they might discourage future mining in the region and stunt economic growth there. I can't follow this kind of reasoning and neither can EPA. The project would be partially funded by a $500 million settlement with Asarco blamed in part for polluting the valley.

I525-6 Two years ago Idaho gutted funding for stream monitoring so we cannot measure changes in water quality to protect the resource. It is far easier and cheaper to monitor a stream than clean it later. Join me in supporting Idaho's water resources by sending Governor Otter a message to revive clean water in 2011!

Fred Rabe

1715 Appaloosa Rd

Moscow, ID 83843

Response to comment I525-5

Thank you for your comment. Please see response to Comment No. I58-5 regarding cleanup and future mining.

Response to comment I525-6

Thank you for your comment. EPA will continue to monitor surface water and groundwater quality in the Upper Basin through the Basin Environmental Monitoring Program (BEMP). See the ROD Amendment, Part 2, Section 12.4 for additional detail.

Radermacher, Florence; Radermacher, Roger, I727, Letter 618724

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
florencer@frontier.com to: formsubmission 11/18/2010 09:48 AM
Sent by: Florencer@Frontier.Com <florencer=frontier.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Roger and Florence Radermacher
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I727-1

We have lived in Post Falls, ID since 2002. We have learned how the citizens of this state take great pride in taking care of one another and the land.

I727-2

You would do well to PAY ATTENTION to these citizens who have our state's health and welfare at the top of their list of important issues. They know the history and are intent upon securing a safe & healthy future for this land.
Coeur d'Alene Basin Resident: Yes
Email Address: florencer@frontier.com
Mailing Address: 673 S. Widgeon St.|Post Falls|IDAHO|83854|US
Phone Number: (208) 457-1495

618724

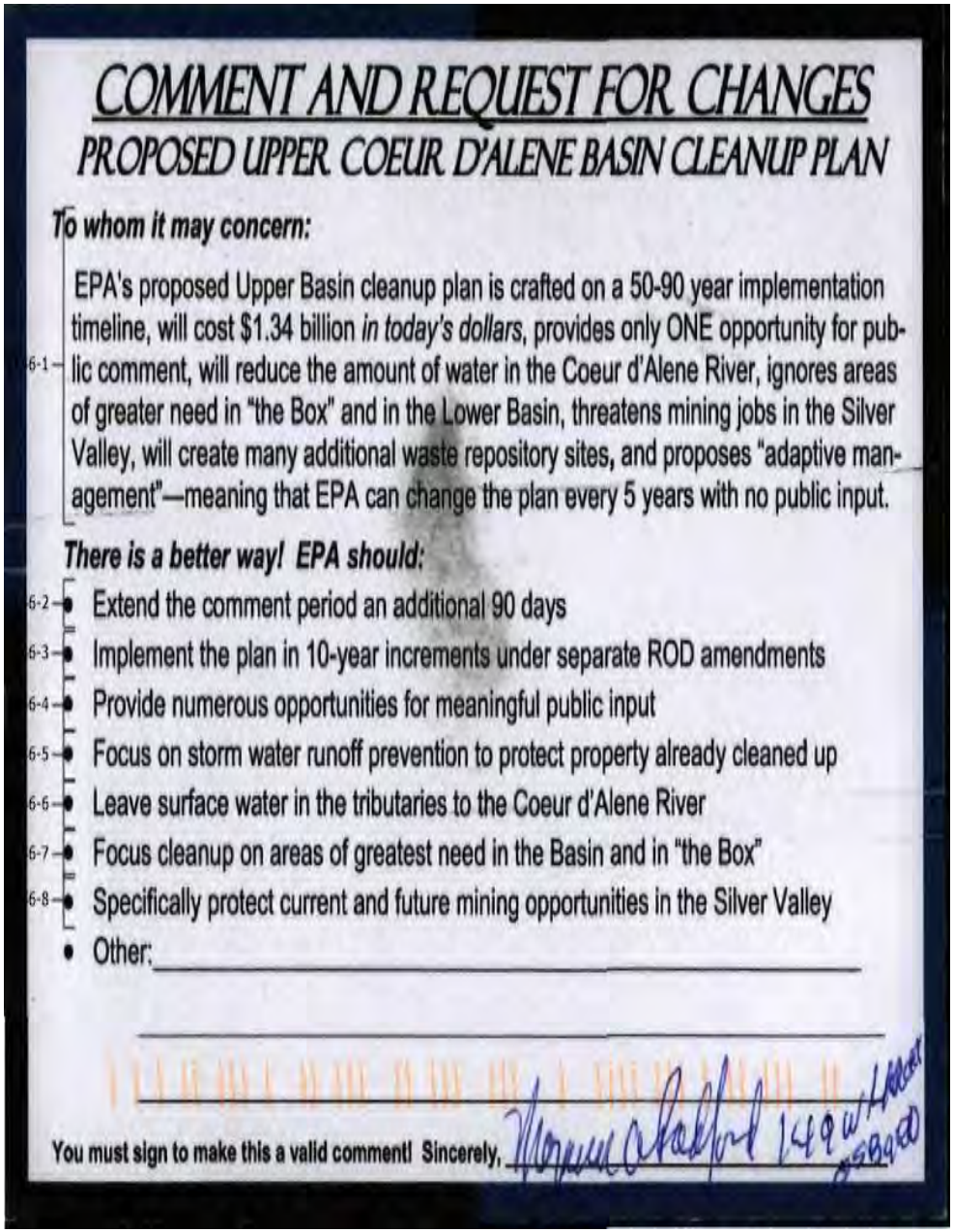
Response to comment I727-1

See response to Comment No. I351-1.

Response to comment I727-2

See responses to Comment Nos. I295-2 and LJ39-5.

Radford, Norman, I146, Letter 1357282



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I146-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I146-2 Extend the comment period an additional 90 days
- I146-3 Implement the plan in 10-year increments under separate ROD amendments
- I146-4 Provide numerous opportunities for meaningful public input
- I146-5 Focus on storm water runoff prevention to protect property already cleaned up
- I146-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I146-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I146-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Norman A Radford 1449 W Hwy 200 83846

Response to comment I146-1
See response to Comment No. I25-1.

Response to comment I146-2
See response to Comment No. I25-2.

Response to comment I146-3
See response to Comment No. I25-3.

Response to comment I146-4
See response to Comment No. I25-4.

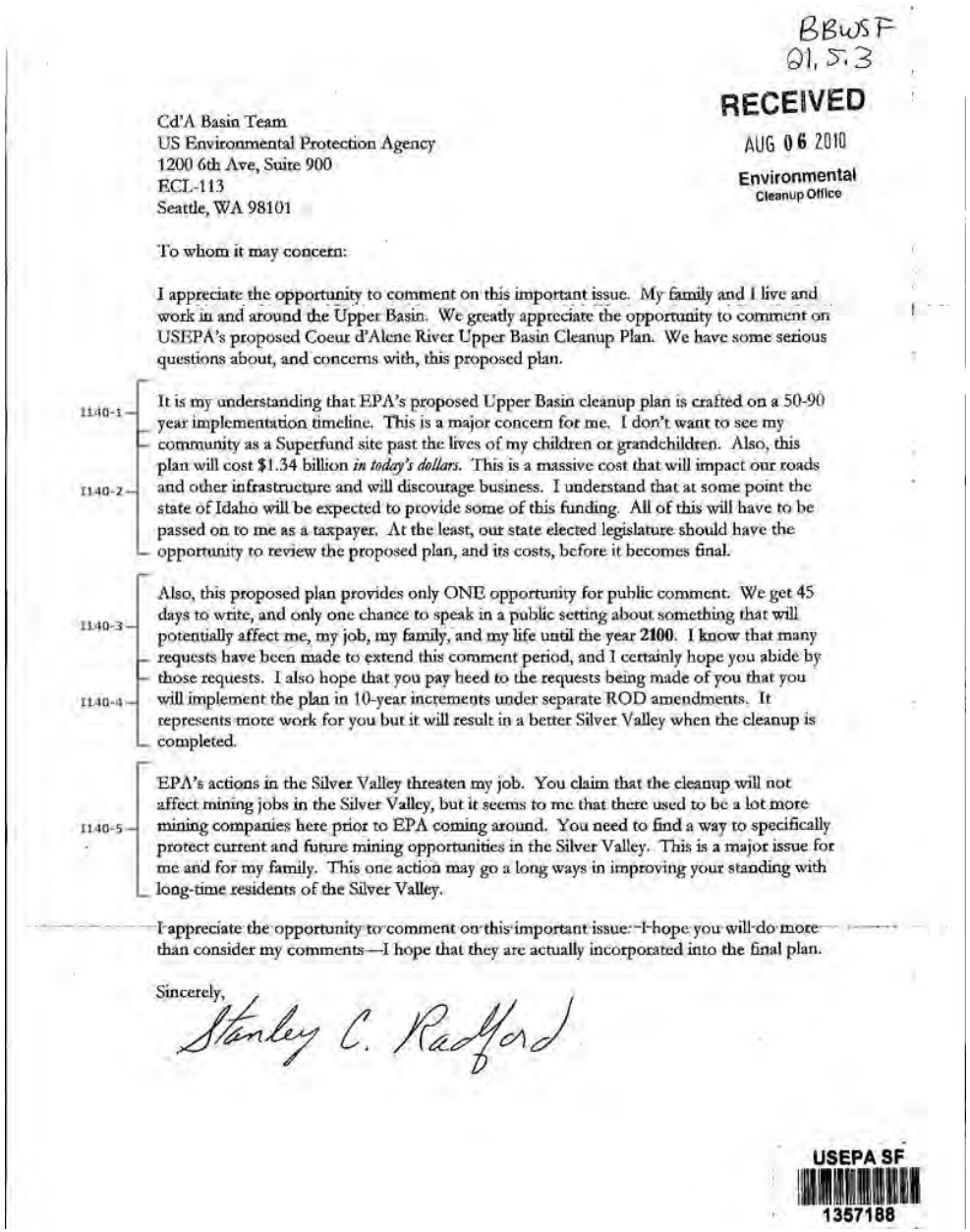
Response to comment I146-5
See response to Comment No. I25-5.

Response to comment I146-6
See response to Comment No. I25-6.

Response to comment I146-7
See response to Comment No. I25-7.

Response to comment I146-8
See response to Comment No. I25-8.

Radford, Stanley C., I140, Letter 1357188



BBWSF
21, 5.3

RECEIVED
AUG 06 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I140-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I140-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I140-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I140-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I140-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Stanley C. Radford

USEPA SF
1357188

Response to comment I140-1
See response to Comment No. I58-1.

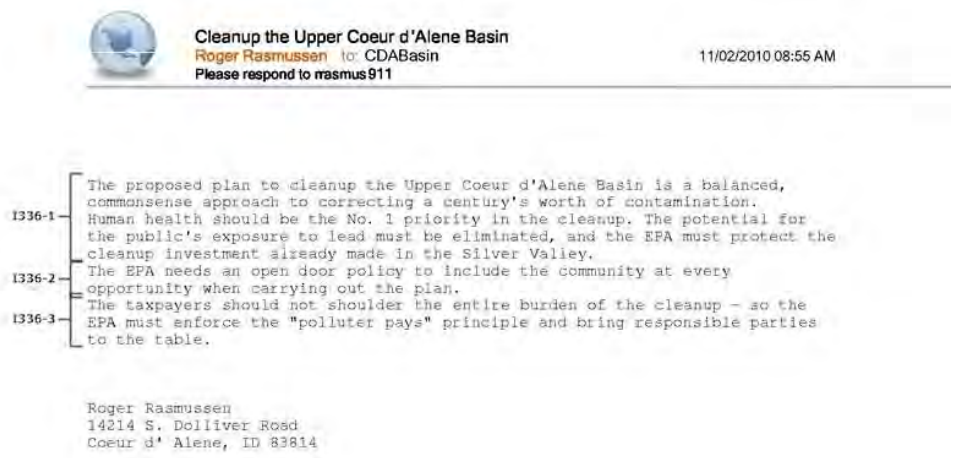
Response to comment I140-2
See response to Comment No. I58-2.

Response to comment I140-3
See response to Comment No. I58-3.

Response to comment I140-4
See response to Comment No. I58-4.

Response to comment I140-5
See response to Comment No. I58-5.

Rasmussen, Roger, I336, Letter 614466



Cleanup the Upper Coeur d'Alene Basin
Roger Rasmussen to: CDABasin 11/02/2010 08:55 AM
Please respond to rrasmus911

I336-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I336-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I336-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Roger Rasmussen
14214 S. Dolliver Road
Coeur d' Alene, ID 83814

614466

Response to comment I336-1

See response to Comment No. I295-1.

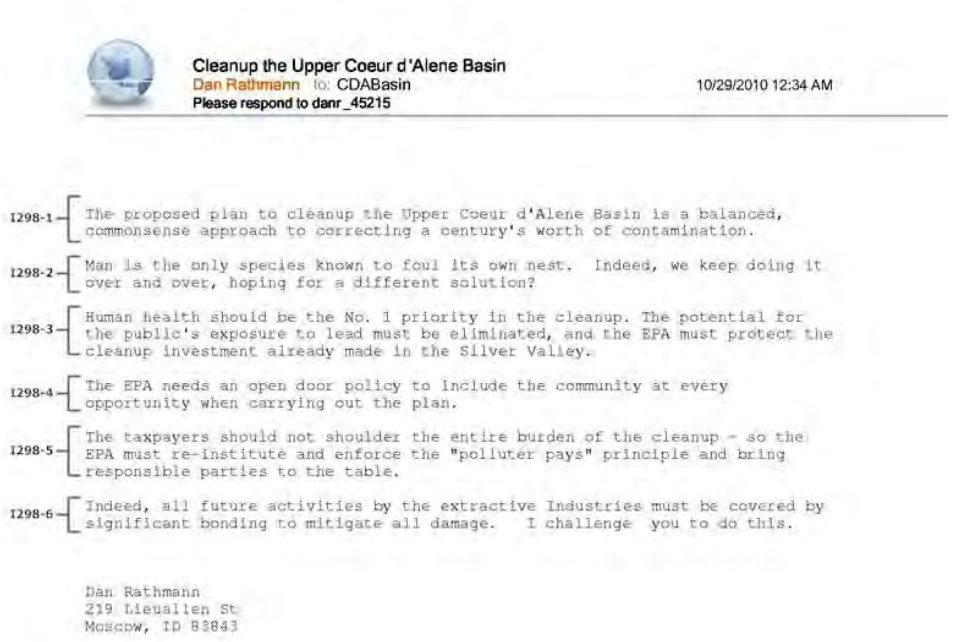
Response to comment I336-2

See response to Comment No. I295-2.

Response to comment I336-3

See response to Comment No. I295-3.

Rathmann, Dan, I298, Letter 614428



Cleanup the Upper Coeur d'Alene Basin
Dan Rathmann to: CDABasin 10/29/2010 12:34 AM
Please respond to danr_45215

I298-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination.

I298-2 Man is the only species known to foul its own nest. Indeed, we keep doing it over and over, hoping for a different solution?

I298-3 Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I298-4 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I298-5 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must re-institute and enforce the "polluter pays" principle and bring responsible parties to the table.

I298-6 Indeed, all future activities by the extractive Industries must be covered by significant bonding to mitigate all damage. I challenge you to do this.

Dan Rathmann
219 Lieuallen St
Moscow, ID 83843

614428

Response to comment I298-1
Comment noted and appreciated.

Response to comment I298-2
Comment noted.

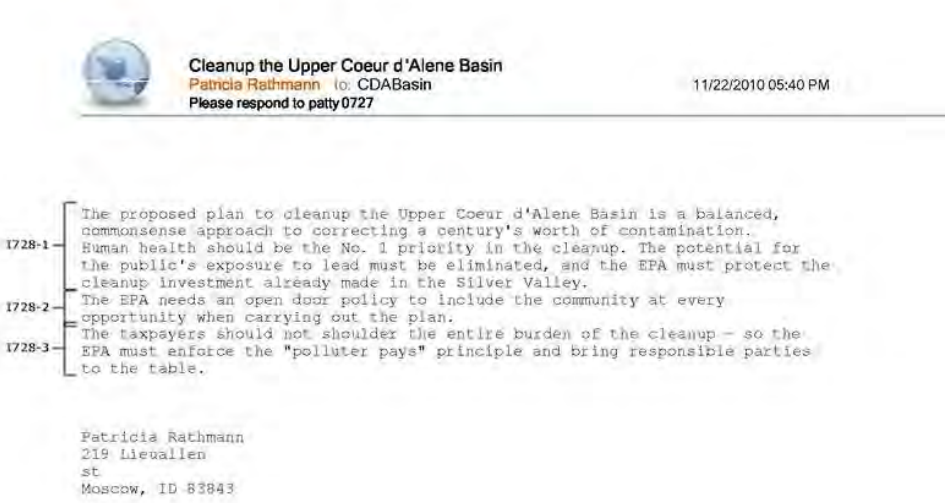
Response to comment I298-3
See response to Comment No. I295-1.

Response to comment I298-4
See response to Comment No. I295-2.

Response to comment I298-5
See response to Comment No. I295-3.

Response to comment I298-6
Thank you for your comment.

Rathmann, Patricia, I728, Letter 618725



Cleanup the Upper Coeur d'Alene Basin
Patricia Rathmann to: CDABasin 11/22/2010 05:40 PM
Please respond to patty 0727

I728-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I728-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I728-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Patricia Rathmann
219 Lieuallen
st
Moscow, ID 83843

618725

Response to comment I728-1

See response to Comment No. I295-1.

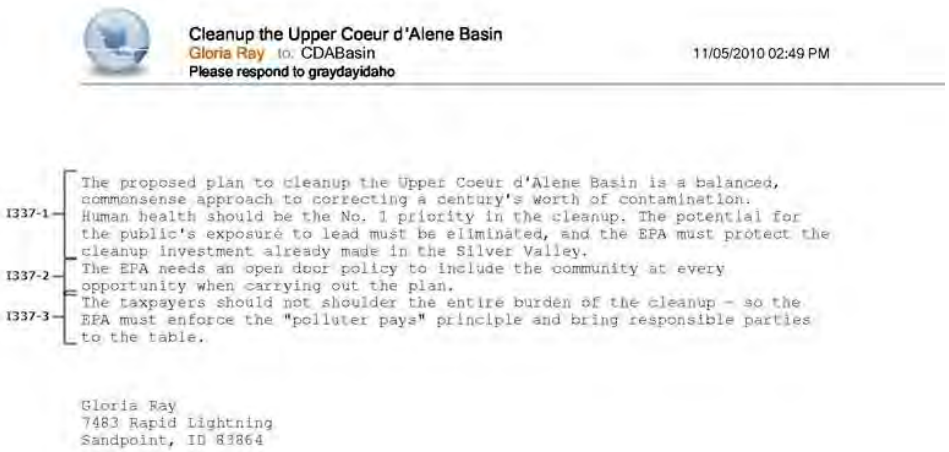
Response to comment I728-2

See response to Comment No. I295-2.

Response to comment I728-3

See response to Comment No. I295-3.

Ray, Gloria, I337, Letter 614467



Cleanup the Upper Coeur d'Alene Basin
Gloria Ray to: CDABasin 11/05/2010 02:49 PM
Please respond to graydayidaho

I337-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I337-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I337-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Gloria Ray
7483 Rapid Lightning
Sandpoint, ID 83864

614467

Response to comment I337-1

See response to Comment No. I295-1.

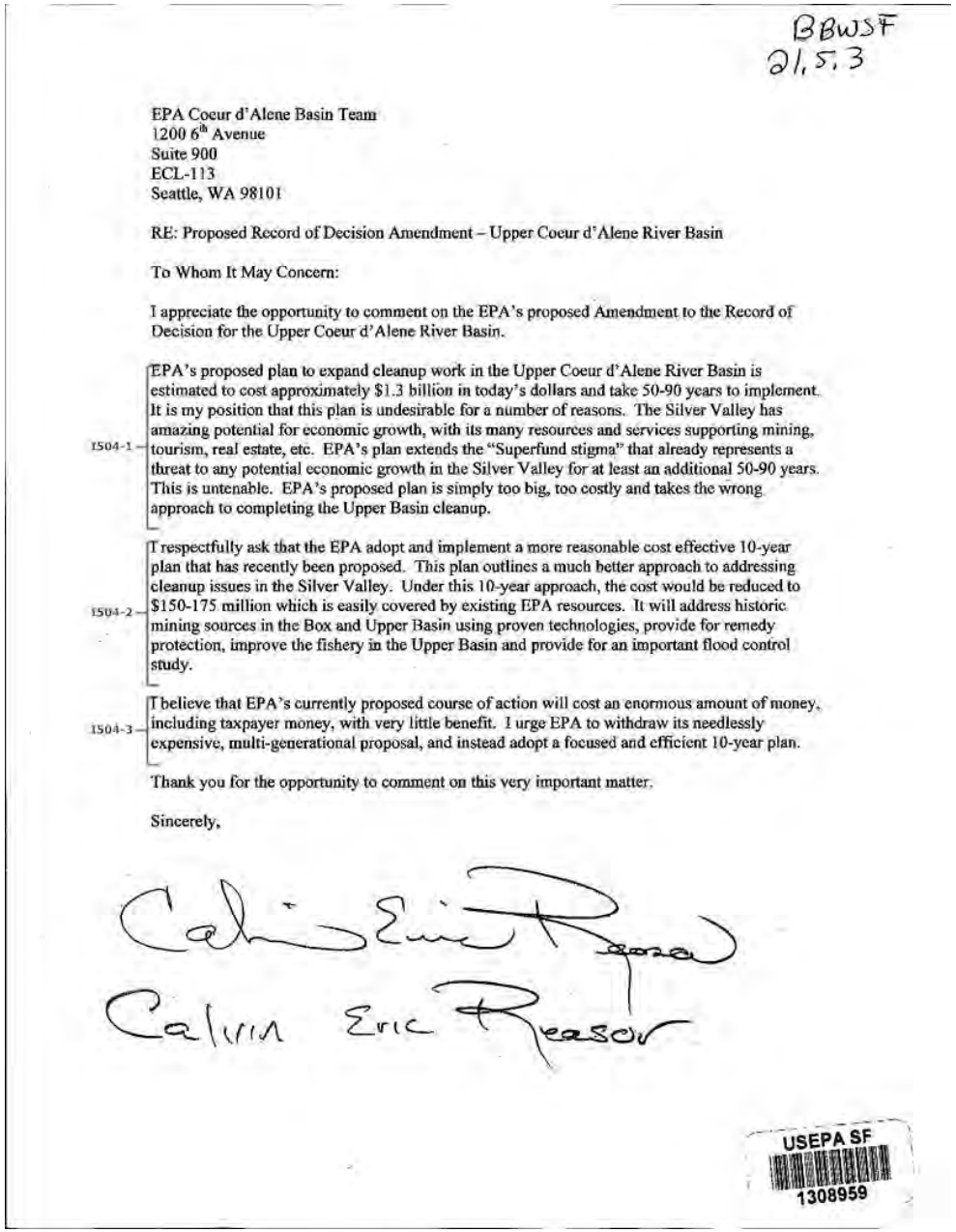
Response to comment I337-2

See response to Comment No. I295-2.

Response to comment I337-3

See response to Comment No. I295-3.

Reasor, Calvin, I504, Letter 1308959



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I504-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I504-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I504-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Calvin Eric Reasor

Calvin Eric Reasor

USEPA SF
1308959

Response to comment I504-1

See response to Comment No. I474-1.

Response to comment I504-2

See response to Comment No. I474-2.

Response to comment I504-3

See response to Comment No. I474-3.

Reece, Ronald, I417, Letter 616320

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
rvreece@yahoo.com to: formsubmission 11/16/2010 07:18 AM
Sent by: Rvreece@Yahoo.Com <rvreece=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Ronald Reece
Date: 11/16/2010

I417-1 Brief Overview: My primary concerns are that the EPA plan is a costly "sledgehammer" solution that will infringe on the rights of the local residents and businesses. Without state and local support for EPA's plan, it will generate hostility and resentment, being perceived as unnecessary Federal intrusion.

I417-2 And if the EPA is going to re-route 19K gpm of river water, it's going to have a dramatic and unanticipated consequences on local fisheries.

I417-3 EPA works best when it works WITH state and local authorities, creating ownership of the problem, as well as the solution. There is simply no need for EPA to engage in such heavy-handed approach that circumvents local concerns.

I417-4 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts — The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: rvreece@yahoo.com
Mailing Address: 932 N. Eisenhower|Jerome|ID|83338|US
Phone Number:

616320

Response to comment I417-1

See responses to Comment Nos. LJ39-5 and I295-2.

Response to comment I417-2

See response to Comment No. I54-8.

Response to comment I417-3

See response to Comment No. I295-2.

Response to comment I417-4

See response to Comment No. I351-1.

Reed, Mary Lou, I586, Letter 617767

Fw: Proposed Cleanup Plan
Anne Dailey To: cdabasin 11/22/2010 10:51 AM

Anne Dailey
U.S. Environmental Protection Agency
1200 Sixth Avenue Suite 900 (MS ECL-113)
Seattle, WA 98101
ph - 206/553-2110 / fax - 206/553-0124
dailey.anne@epa.gov
http://yosemite.epa.gov/r10/cleanup.nsf/sites/cda
---- Forwarded by Anne Dailey/R10/USEPA/US on 11/22/2010 10:52 AM ----

From: Bill Adams/R10/USEPA/US
To: Anne Dailey/R10/USEPA/US@EPA
Date: 11/22/2010 07:16 AM
Subject: Fw: Proposed Cleanup Plan

From:

Bill Adams
Environmental Scientist/ Project Manager
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Mailstop ECL-113
Seattle, WA 98101

Office Phone: 206-553-2806
Cell Phone: 206-890-0977
Fax : 206-553-0124
email: adams.bill@epa.gov
---- Forwarded by Bill Adams/R10/USEPA/US on 11/22/2010 07:15 AM ----

From: mloucda@aol.com
To: CDABasin@EPA, Bill Adams/R10/USEPA/US@EPA, Anne McCauley/R10/USEPA/US@EPA
Date: 11/19/2010 03:27 PM
Subject: Proposed Cleanup Plan

I586-1 I write in general support of EPA's proposed plan. The hue and cry from the opposition clouds the fact that, without such concerted effort as the plan offers, the basin will never be rid of lead and other metal contamination. Swans will continue to be poisoned, kids will endure lead in their bodies, beaches will show positive signs of contamination, the health of the Coeur d' Alene River and Coeur d'Alene Lake will continue to be threatened. I agree with written testimony offered by the conservation organizations that more aggressive action is needed rather than less. As a downstreamresident, I support accelerated timeframes so that comprehensive cleanup in the lower basin can proceed earlier. I586-2

I586-3 Water treatment in the Box makes great good sense. I support the RP-2 Alternative. The cleanup standards do need to be robust enough to support the health of the entire ecosystem.

I586-4 I do worry about the frequency of floods of the South Fork, which appear to be caused in part by increased sedimentation of the river. It is important to remove lead that has built up in the banks.

I586-5 I think the 90 year projection is way beyond our imagination. However, I understand there certainly are

617767

Response to comment I586-1

Thank you for your comment.

Response to comment I586-2

Thank you for your comment. See response to Comment No. I58-1 regarding the expected duration of cleanup for the Selected Remedy.

Response to comment I586-3

Thank you for your comment. The cleanup standards are based on site-specific toxicity evaluations conducted by the State of Idaho and have been determined by EPA to be protective of human health and the environment. The cleanup is required to meet all applicable and relevant standards including the Site Specific State Water Quality Standards.

Response to comment I586-4

During site characterization and remedial design of remedy protection, source control, and water quality projects, EPA will continue to coordinate with local communities and flood control authorities, the Basin Commission, the U.S. Army Corp of Engineers, and the Federal Emergency Management Agency. This coordination will ensure that cleanup actions do not exacerbate flooding concerns along the SFCDR and Pine Creek, and will leverage future work by the various entities involved in SFCDR and Pine Creek activities.

Response to comment I586-5

See response to Comment No. I58-1.

1586-5

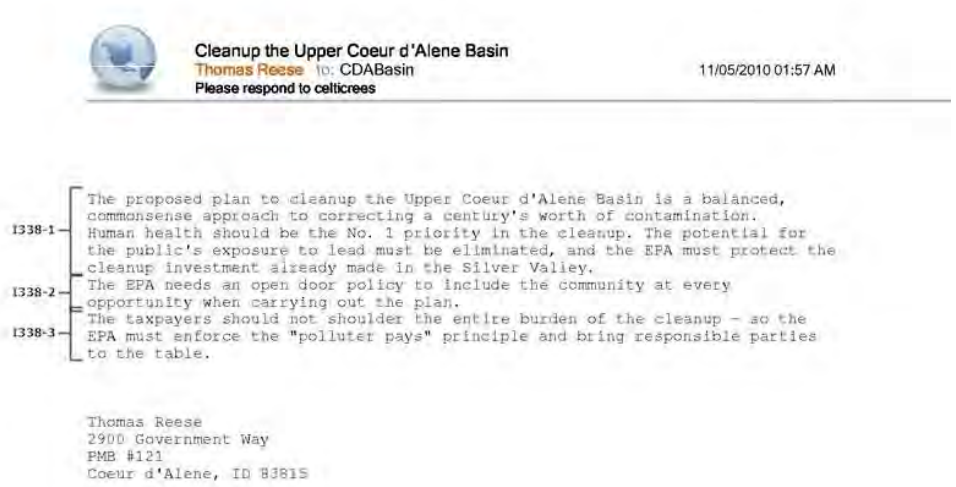
physical and financial concerns that slow down the pace of the cleanup. Nonetheless, a push for an earlier finish makes good sense to me.

Please consider this a letter of full support of EPA, with agreement on considerations offered by the Kootenai Environmental Alliance. The plan can be organically altered along the way if new facts and methods appear. The important thing is to not listen to the naysayers. Charge ahead. Sincerely, Mary Lou Reed

Mary Lou Reed
408 Sherman, Rm. 310
Coeur d'Alene, ID 83814
208-664-3564
mloucda@aol.com

No comments

Reese, Thomas, I338, Letter 614468



Cleanup the Upper Coeur d'Alene Basin
Thomas Reese To: CDABasin 11/05/2010 01:57 AM
Please respond to celticrees

I338-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I338-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I338-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Thomas Reese
2900 Government Way
PMB #121
Coeur d'Alene, ID 83815

614468

Response to comment I338-1

See response to Comment No. I295-1.

Response to comment I338-2

See response to Comment No. I295-2.

Response to comment I338-3

See response to Comment No. I295-3.

Regan, Joseph, I418, Letter 616321

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jregan15@yahoo.com to: formsubmission 11/15/2010 08:33 AM
Sent by: Jregan15@Yahoo.Com <jregan15=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: joseph regan
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I418-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: jregan15@yahoo.com
Mailing Address: 868 North LaSalle|Chicago|IL|60610|US
Phone Number: (312) 332-7403

616321

Response to comment I418-1

See response to Comment No. I351-1.

Reid, Richard, I730, Letter 618727

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
richard.reid@newmont.com to: formsubmission 11/17/2010 06:57 PM
Sent by: Richard.Reid@Newmont.Com <richard.reid=newmont.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Richard Reid
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could elimnate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: richard.reid@newmont.com
Mailing Address: 3 Spring Creek Lane|Spring Creek|Nevada|89815|US
Phone Number:

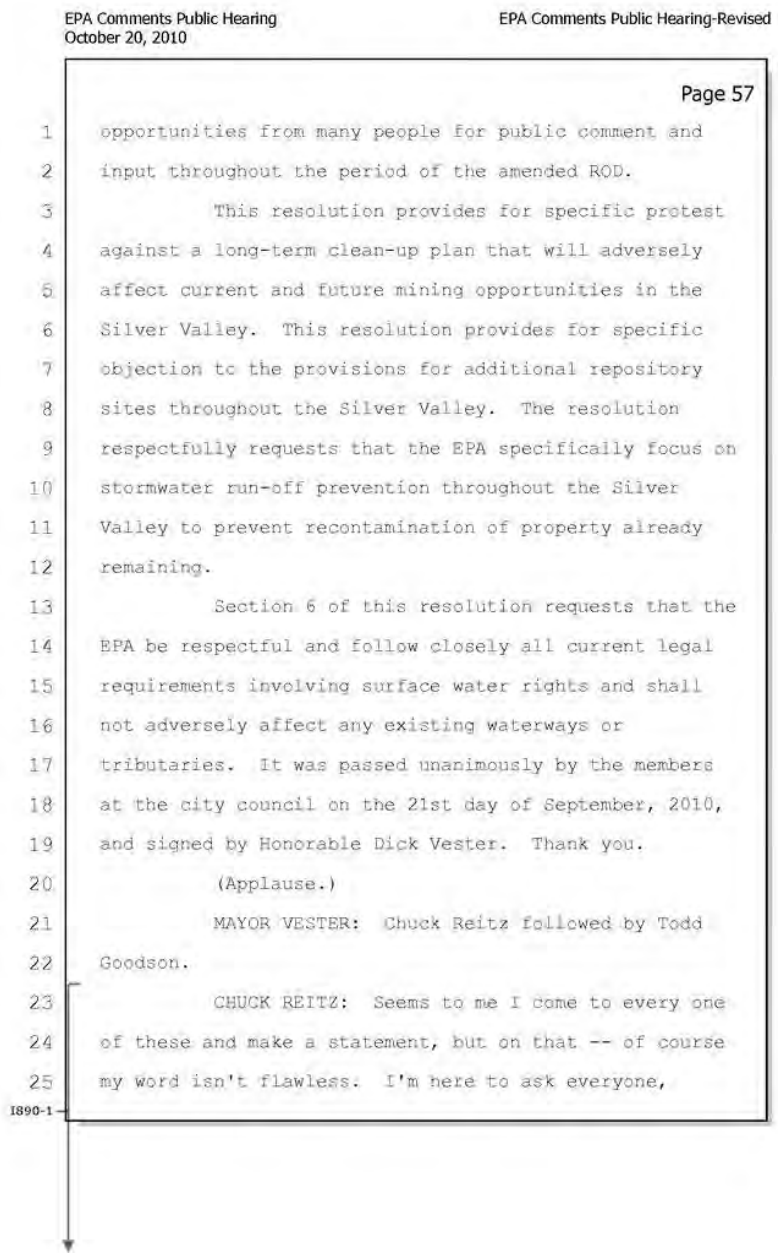
I730-1

618727

Response to comment I730-1

See response to Comment No. I351-1.

Reitz, Chuck, I890, Letter 619651-23



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 57

opportunities from many people for public comment and input throughout the period of the amended ROD.

This resolution provides for specific protest against a long-term clean-up plan that will adversely affect current and future mining opportunities in the Silver Valley. This resolution provides for specific objection to the provisions for additional repository sites throughout the Silver Valley. The resolution respectfully requests that the EPA specifically focus on stormwater run-off prevention throughout the Silver Valley to prevent recontamination of property already remaining.

Section 6 of this resolution requests that the EPA be respectful and follow closely all current legal requirements involving surface water rights and shall not adversely affect any existing waterways or tributaries. It was passed unanimously by the members at the city council on the 21st day of September, 2010, and signed by Honorable Dick Vester. Thank you.

(Applause.)

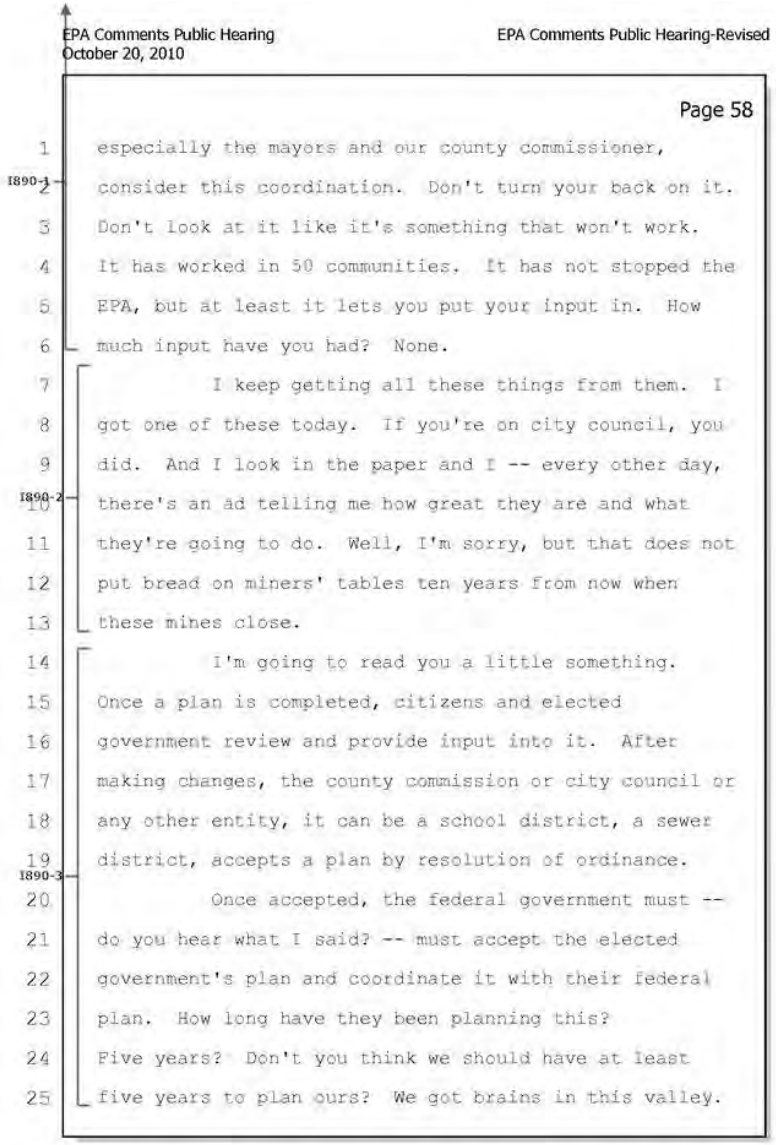
MAYOR VESTER: Chuck Reitz followed by Todd Goodson.

CHUCK REITZ: Seems to me I come to every one of these and make a statement, but on that -- of course my word isn't flawless. I'm here to ask everyone,

I890-1

Response to comment I890-1

Thank you for your comment. See response to Comment No. I295-1.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 58

especially the mayors and our county commissioner, consider this coordination. Don't turn your back on it. Don't look at it like it's something that won't work. It has worked in 50 communities. It has not stopped the EPA, but at least it lets you put your input in. How much input have you had? None.

I keep getting all these things from them. I got one of these today. If you're on city council, you did. And I look in the paper and I -- every other day, there's an ad telling me how great they are and what they're going to do. Well, I'm sorry, but that does not put bread on miners' tables ten years from now when these mines close.

I'm going to read you a little something. Once a plan is completed, citizens and elected government review and provide input into it. After making changes, the county commission or city council or any other entity, it can be a school district, a sewer district, accepts a plan by resolution of ordinance.

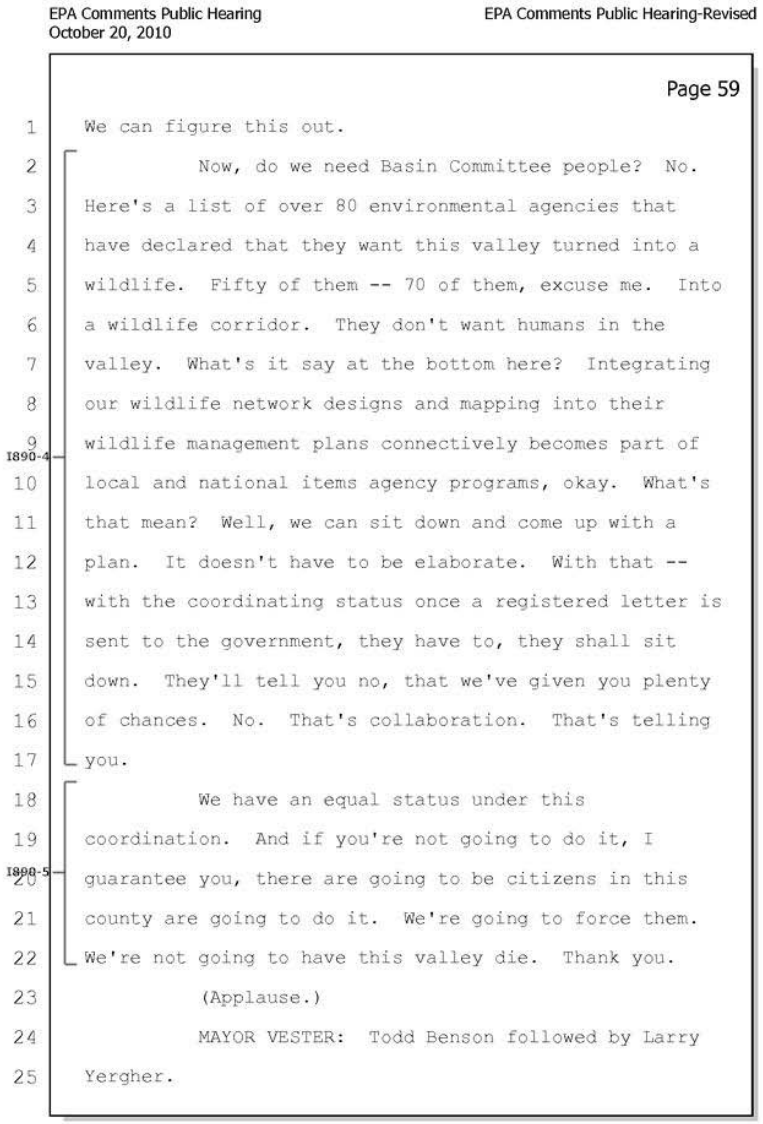
Once accepted, the federal government must -- do you hear what I said? -- must accept the elected government's plan and coordinate it with their federal plan. How long have they been planning this? Five years? Don't you think we should have at least five years to plan ours? We got brains in this valley.

Response to comment I890-2

See response to Comment No. I58-5.

Response to comment I890-3

It is difficult to determine what the commenter is referring to or reading from. However, the commenter's infer that EPA failed to satisfy CERCLA's public participation requirements and failed to address local concerns related to the cleanup. Both inferences are mistaken. EPA has complied with and gone beyond CERCLA's and the National Oil and Hazardous Substances Pollution Contingency Plan's requirements for public participation, and has modified the scope of the Upper Basin cleanup, in part, to address local citizens concerns and considerations. See, responses to Comment Nos. I-351-3, I54-6, I58-1, and I58-2.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 59

We can figure this out.

Now, do we need Basin Committee people? No. Here's a list of over 80 environmental agencies that have declared that they want this valley turned into a wildlife. Fifty of them -- 70 of them, excuse me. Into a wildlife corridor. They don't want humans in the valley. What's it say at the bottom here? Integrating our wildlife network designs and mapping into their wildlife management plans connectively becomes part of I890-4 local and national items agency programs, okay. What's that mean? Well, we can sit down and come up with a plan. It doesn't have to be elaborate. With that -- with the coordinating status once a registered letter is sent to the government, they have to, they shall sit down. They'll tell you no, that we've given you plenty of chances. No. That's collaboration. That's telling you.

We have an equal status under this coordination. And if you're not going to do it, I I890-5 guarantee you, there are going to be citizens in this county are going to do it. We're going to force them. We're not going to have this valley die. Thank you.

(Applause.)

MAYOR VESTER: Todd Benson followed by Larry Yergher.

Response to comment I890-4

Comment noted.

Response to comment I890-5

Thank you for your comment.

Retter, Gene, I731, Letter 618728

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
retters1@roadrunner.com to: formsubmission 11/19/2010 10:45 AM
Sent by: Retters1@Roadrunner.Com <retters1=roadrunner.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Gene Retter
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. I was raised in the silver valley. Worked at the Bunker Hill Smelter 10 years. my Dad worked there for 42 years. Niether of us or our familys had any ill effects from this. Go ahead and clean the water and soil aroung Kellogg, but leave the rest alone. It will cause more problems than it will help. Gene retter
Coeur d'Alene Basin Resident: Yes
Email Address: retters1@roadrunner.com
Mailing Address: 616E 13th. Ave.|PostFalls|Idaho|83854|US
Phone Number: (208) 691-3414

I731-1

I731-2

618728

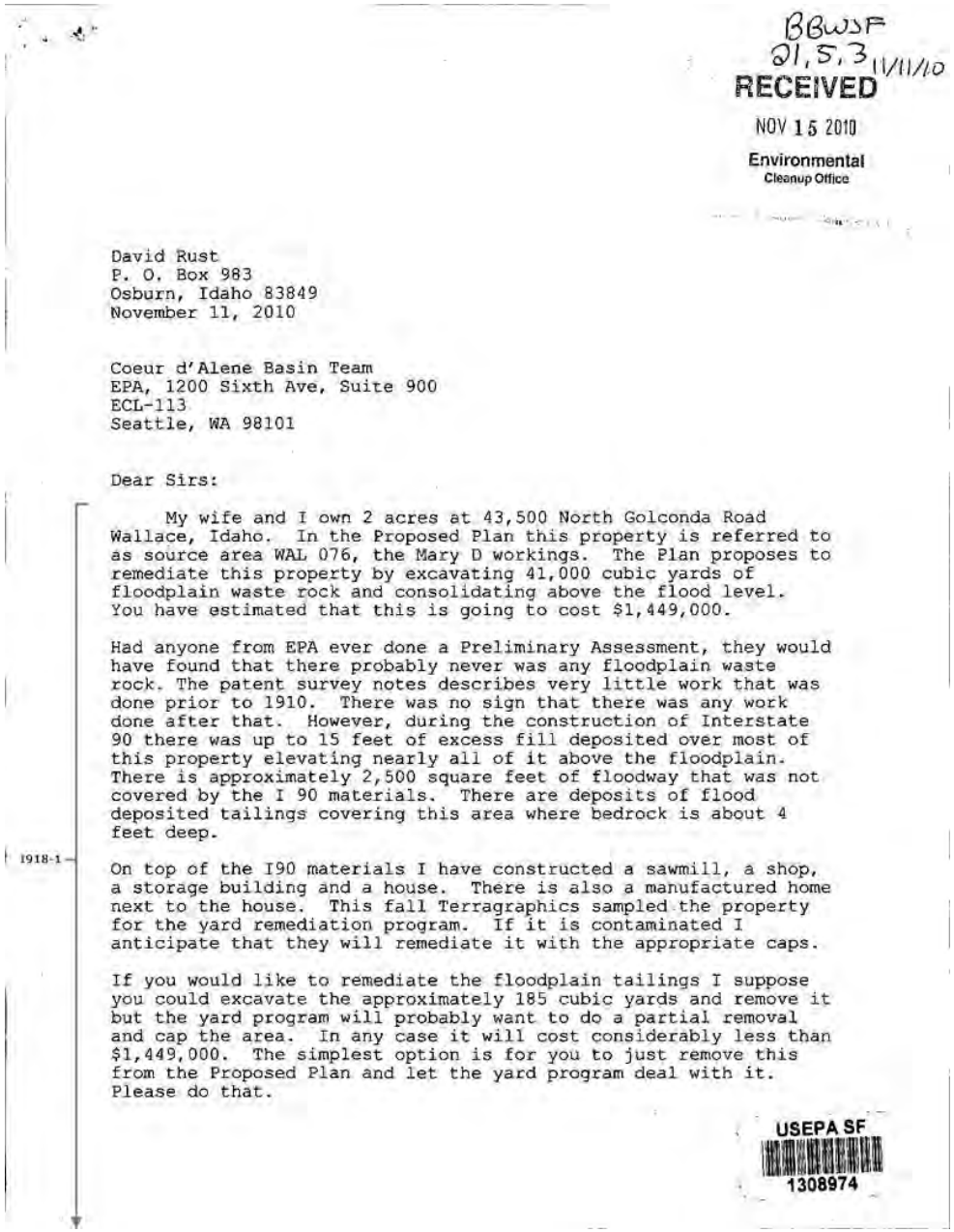
Response to comment I731-1

See response to Comment No. I351-1.

Response to comment I731-2

See response to Comment No. LJ39-5.

Rex Mine and Mill, I918, Letter 1308974



BBWSF
21,5,3 11/11/10

RECEIVED
NOV 15 2010
Environmental
Cleanup Office

David Rust
P. O. Box 983
Osburn, Idaho 83849
November 11, 2010

Coeur d'Alene Basin Team
EPA, 1200 Sixth Ave, Suite 900
ECL-113
Seattle, WA 98101

Dear Sirs:

My wife and I own 2 acres at 43,500 North Golconda Road Wallace, Idaho. In the Proposed Plan this property is referred to as source area WAL 076, the Mary D workings. The Plan proposes to remediate this property by excavating 41,000 cubic yards of floodplain waste rock and consolidating above the flood level. You have estimated that this is going to cost $1,449,000.

Had anyone from EPA ever done a Preliminary Assessment, they would have found that there probably never was any floodplain waste rock. The patent survey notes describes very little work that was done prior to 1910. There was no sign that there was any work done after that. However, during the construction of Interstate 90 there was up to 15 feet of excess fill deposited over most of this property elevating nearly all of it above the floodplain. There is approximately 2,500 square feet of floodway that was not covered by the I 90 materials. There are deposits of flood deposited tailings covering this area where bedrock is about 4 feet deep.

1918-1

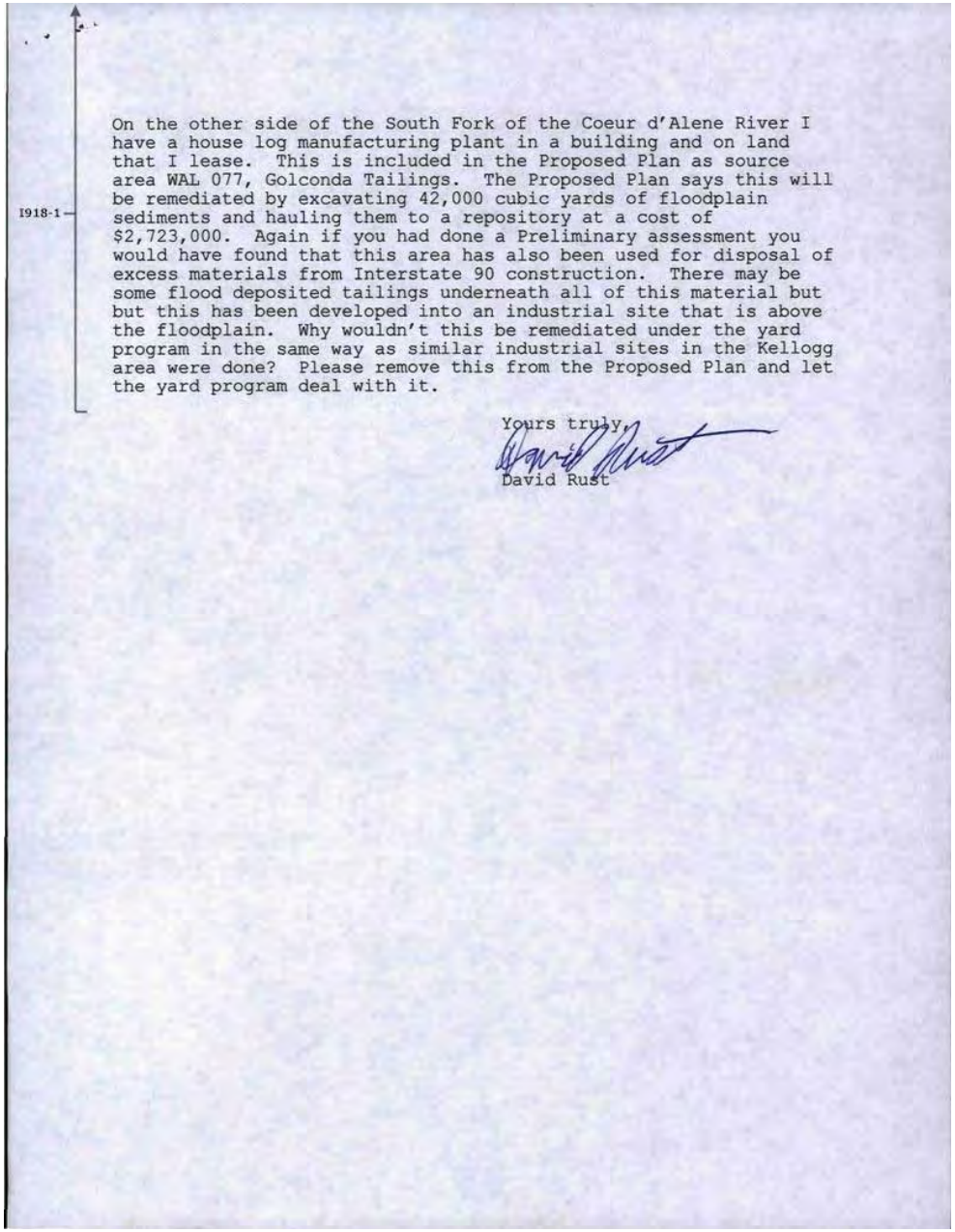
On top of the I90 materials I have constructed a sawmill, a shop, a storage building and a house. There is also a manufactured home next to the house. This fall Terragraphics sampled the property for the yard remediation program. If it is contaminated I anticipate that they will remediate it with the appropriate caps.

If you would like to remediate the floodplain tailings I suppose you could excavate the approximately 185 cubic yards and remove it but the yard program will probably want to do a partial removal and cap the area. In any case it will cost considerably less than $1,449,000. The simplest option is for you to just remove this from the Proposed Plan and let the yard program deal with it. Please do that.

USEPA SF
1308974

Response to comment I918-1

The Selected Remedy selects typical conceptual designs for these sites as discussed in this letter. Prior to implementation of any cleanup actions, EPA will conduct pre-design investigations at these sites. These investigations will likely include site investigations to determine the nature and extent of contamination and waste characterization. If site investigations show that there is little or no risk posed by any contaminants at this site, then cleanup actions will not be conducted. EPA will work with the site owner to determine how to conduct pre-design and/or cleanup activities while minimizing interruption to any existing site operations.



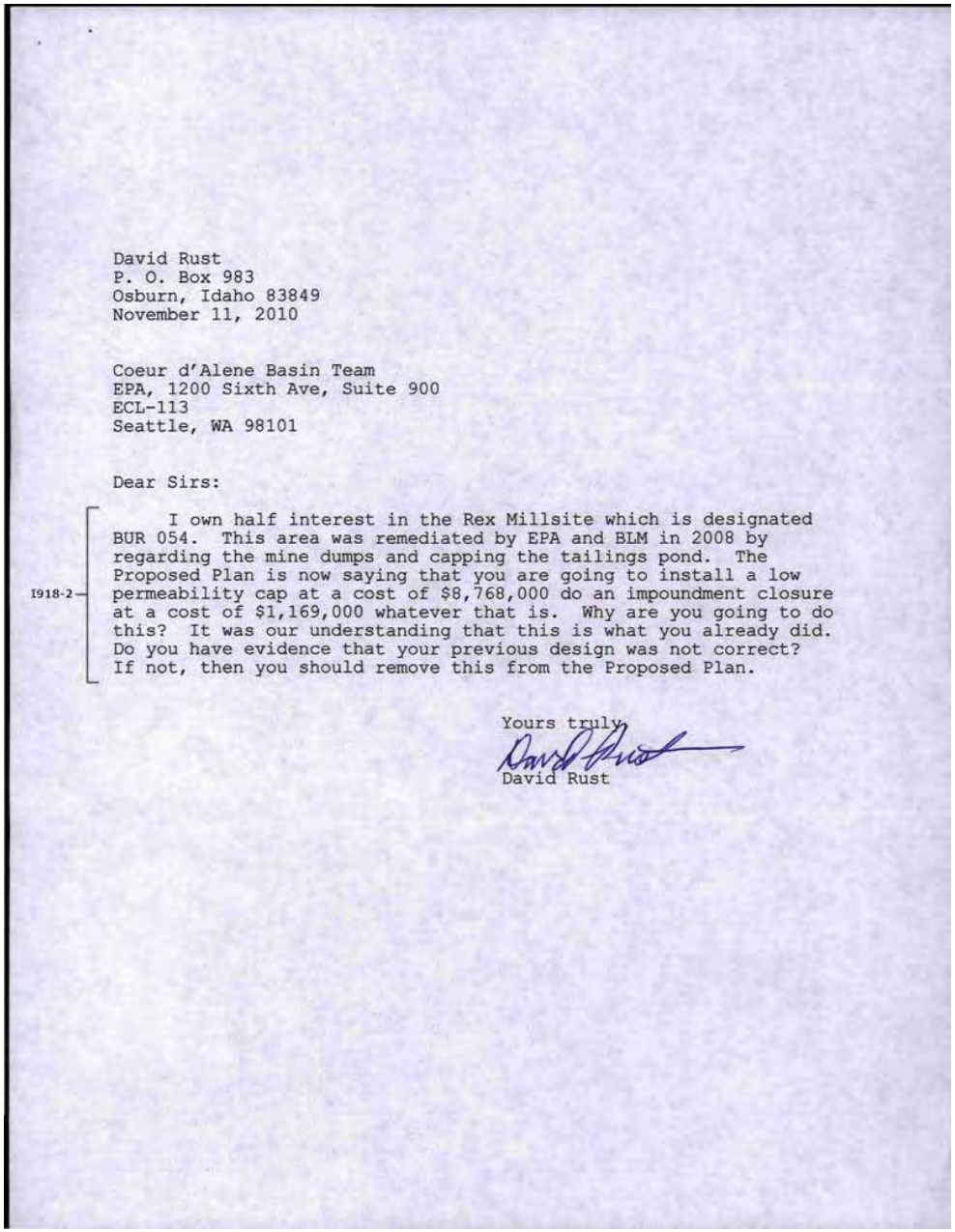
I918-1

On the other side of the South Fork of the Coeur d'Alene River I have a house log manufacturing plant in a building and on land that I lease. This is included in the Proposed Plan as source area WAL 077, Golconda Tailings. The Proposed Plan says this will be remediated by excavating 42,000 cubic yards of floodplain sediments and hauling them to a repository at a cost of $2,723,000. Again if you had done a Preliminary assessment you would have found that this area has also been used for disposal of excess materials from Interstate 90 construction. There may be some flood deposited tailings underneath all of this material but but this has been developed into an industrial site that is above the floodplain. Why wouldn't this be remediated under the yard program in the same way as similar industrial sites in the Kellogg area were done? Please remove this from the Proposed Plan and let the yard program deal with it.

Yours truly,

David Rust

No comments



David Rust
P. O. Box 983
Osburn, Idaho 83849
November 11, 2010

Coeur d'Alene Basin Team
EPA, 1200 Sixth Ave, Suite 900
ECL-113
Seattle, WA 98101

Dear Sirs:

I918-2 I own half interest in the Rex Millsite which is designated BUR 054. This area was remediated by EPA and BLM in 2008 by regarding the mine dumps and capping the tailings pond. The Proposed Plan is now saying that you are going to install a low permeability cap at a cost of $8,768,000 do an impoundment closure at a cost of $1,169,000 whatever that is. Why are you going to do this? It was our understanding that this is what you already did. Do you have evidence that your previous design was not correct? If not, then you should remove this from the Proposed Plan.

Yours truly,
David Rust

Response to comment I918-2

The Rex No. 2/Sixteen-To-One Mine (BUR054) has been excluded from the Selected Remedy. This site has been categorized as a previously remediated site. This site will continue to be monitored to determine the effectiveness of cleanup actions in meeting Remedial Action Objectives. Review of the monitoring results and the protectiveness of the cleanup actions will be documented in Five-Year Reviews consistent with CERCLA and the 2002 ROD for OU 3 (EPA, 2002, www.epa.gov/superfund/sites/rods/fulltext/r1002032.pdf).

Rex, Floyd, I419, Letter 616322

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

billiardboybowhunter@hotmail.com to: formsubmission 11/12/2010 07:23 AM

Sent by: Billiardboybowhunter@Hotmail.Com <billiardboybowhunter=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

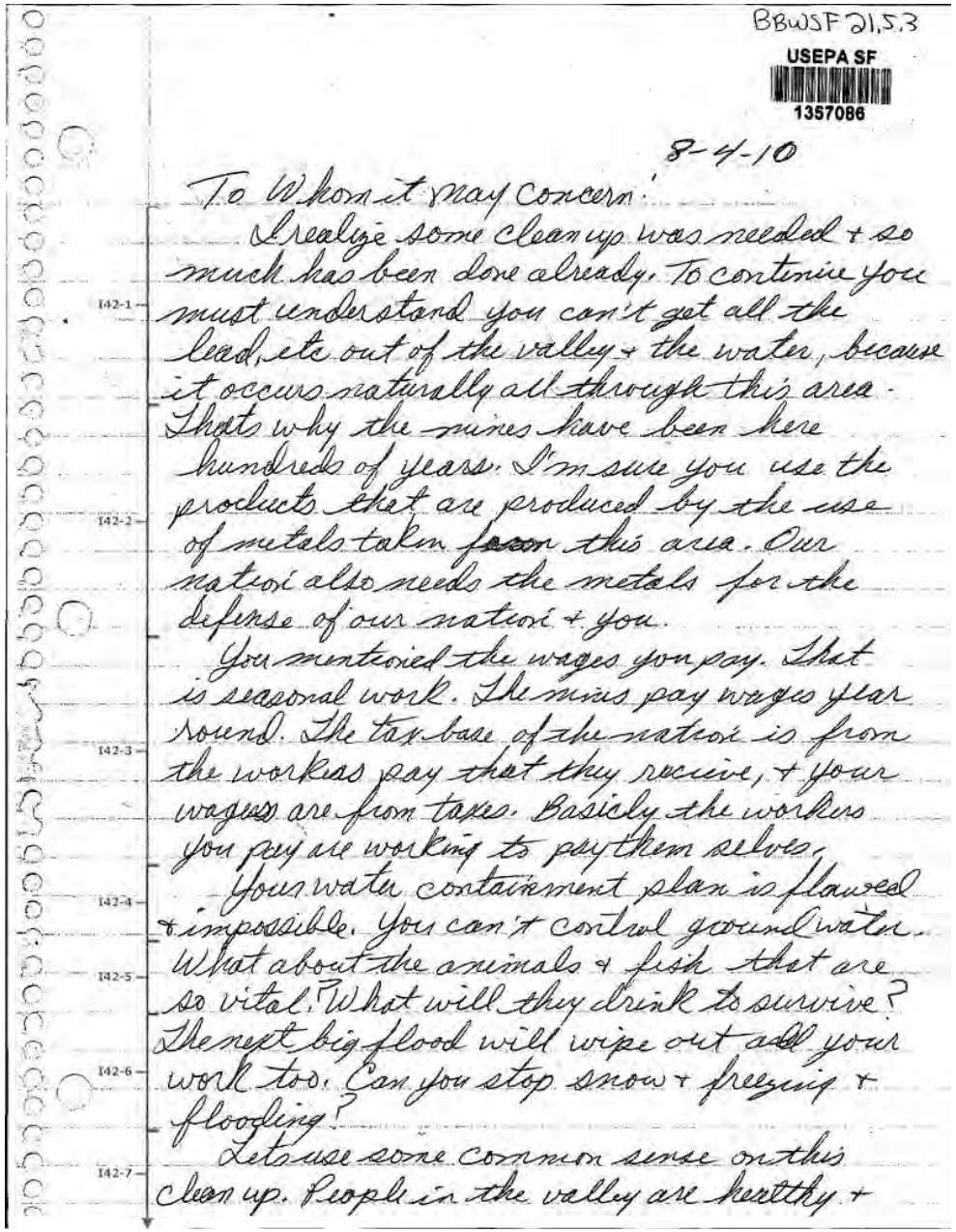
From: Floyd Rex
Date: 09/08/1970
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I419-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: billiardboybowhunter@hotmail.com
Mailing Address: 703 S. Division St.|Pinehurst|ID|83850|US
Phone Number:

616322

Response to comment I419-1

See response to Comment No. I351-1.

Reynolds, Carol, I42, Letter 1357086



BBWSF 21.5.3
USEPA SF
1357086

8-4-10

To Whom it may Concern:

I realize some clean up was needed + so much has been done already. To continue you must understand you can't get all the lead, etc out of the valley + the water, because it occurs naturally all through this area. That's why the mines have been here hundreds of years. I'm sure you use the products that are produced by the use of metals taken from this area. Our nation also needs the metals for the defense of our nation + you.

You mentioned the wages you pay. That is seasonal work. The mines pay wages year round. The tax base of the nation is from the workers pay that they receive, + your wages are from taxes. Basicly the workers you pay are working to pay them selves.

Your water containment plan is flawed + impossible. You can't control ground water. What about the animals + fish that are so vital. What will they drink to survive? The next big flood will wipe out all your work too. Can you stop snow + freezing + flooding?

Lets use some common sense on this clean up. People in the valley are healthy +

I42-1
I42-2
I42-3
I42-4
I42-5
I42-6
I42-7

Response to comment I42-1
See response to Comment No. LC33-8.

Response to comment I42-2
Comment noted.

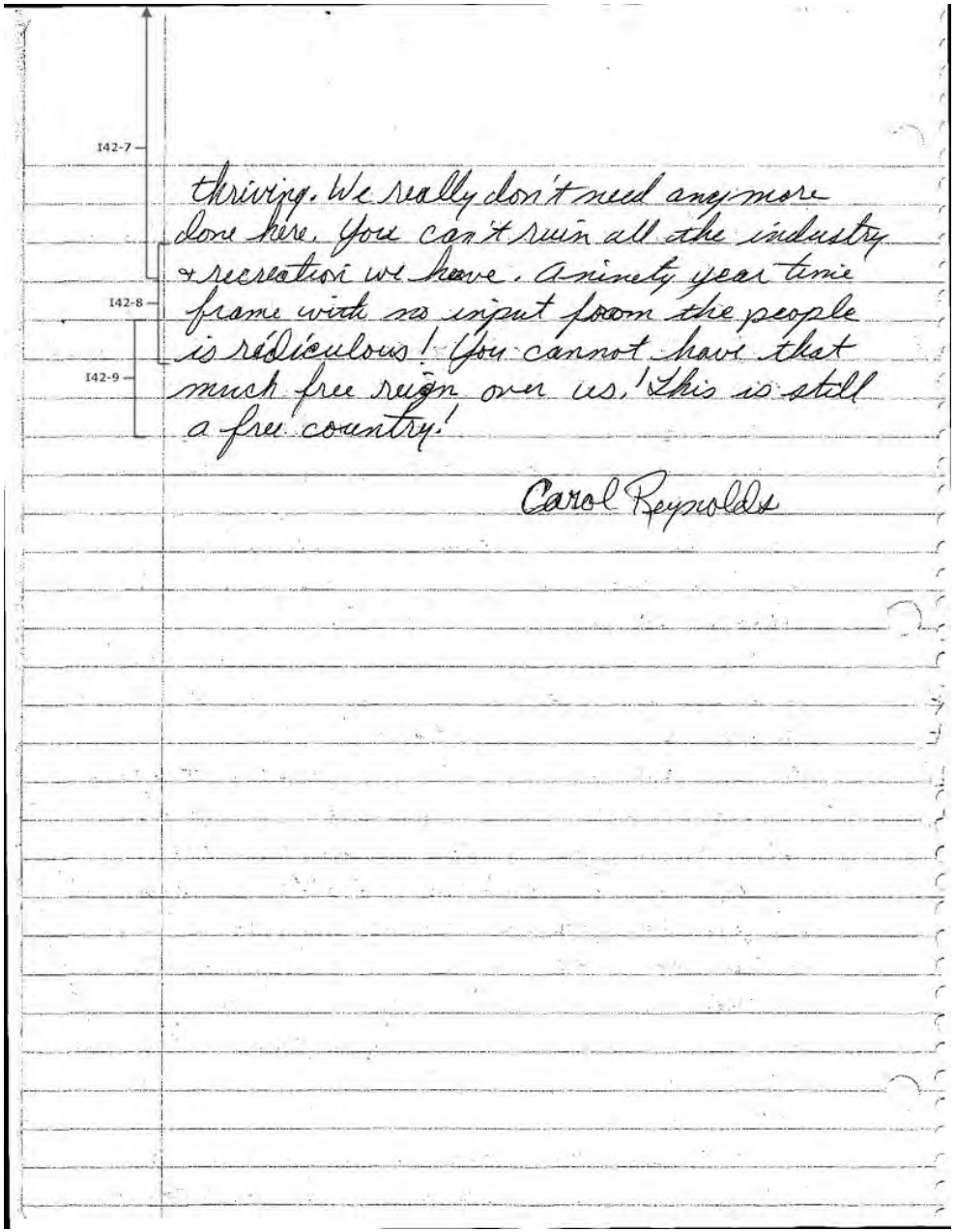
Response to comment I42-3
Comment noted. See response to Comment No. I295-3.

Response to comment I42-4
Groundwater collection systems can be designed to collect groundwater from targeted areas by creating a depression in the water table, essentially altering the natural direction of groundwater flow. It is a widely used remedial approach. In the Upper Basin, groundwater collection will be used primarily in areas where source control actions are not feasible or practicable, due to the presence of communities and infrastructure above the waste materials.

Response to comment I42-5
See response to Comment No. LC33-10.

Response to comment I42-6
See responses to Comment Nos. I54-5 and LJ26-3.

Response to comment I42-7
A proven and documented risk to human health and the environment exists at this Superfund site. EPA has a regulatory responsibility to address this risk. Implementation of the Selected Remedy will improve recreational opportunities in the Silver Valley by remediating waste piles and improving water quality. EPA is also confident that cleanup and mining can coexist. See response to comment I58-5.


I42-7
I42-8
I42-9

thriving. We really don't need any more done here. You can't ruin all the industry + recreation we have. A ninety year time frame with no input from the people is ridiculous! You cannot have that much free reign over us. This is still a free country!

Carol Reynolds

Response to comment I42-8

See responses to Comment Nos. I58-1 and I295-2.

Response to comment I42-9

Comment noted.

Reynolds, Tanya, I734, Letter 618732

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
tanyacda@hotmail.com to: formsubmission 11/19/2010 10:28 AM
Sent by: Tanyacda@Hotmail.Com <tanyacda=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

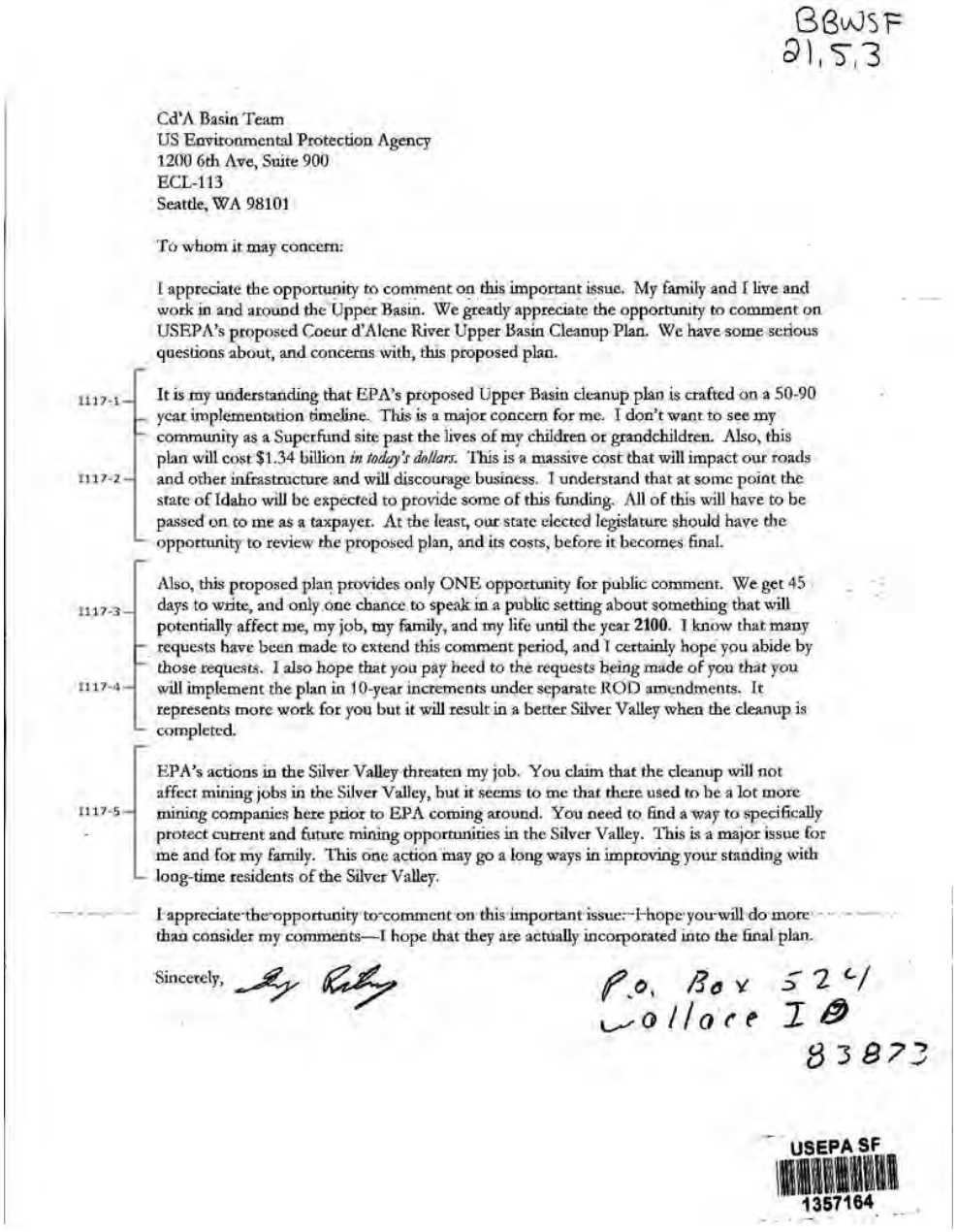
From: Tanya Reynolds
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, I734-1 Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. I grew up in the Silver Valley and my parents still live there.
Coeur d'Alene Basin Resident: No
Email Address: tanyacda@hotmail.com
Mailing Address: 805 E Homestead Avenue|Coeur d Alene|ID|83814|US
Phone Number: (208) 446-1220

618732

Response to comment I734-1

See response to Comment No. I351-1.

Riby, Guy, I117, Letter 1357164



BBWSF
21,5,3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I117-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I117-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I117-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I117-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I117-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely, Guy Riby

P.O. Box 524
Wallace ID
83873

USEPA SF
1357164

Response to comment I117-1
See response to Comment No. I58-1.

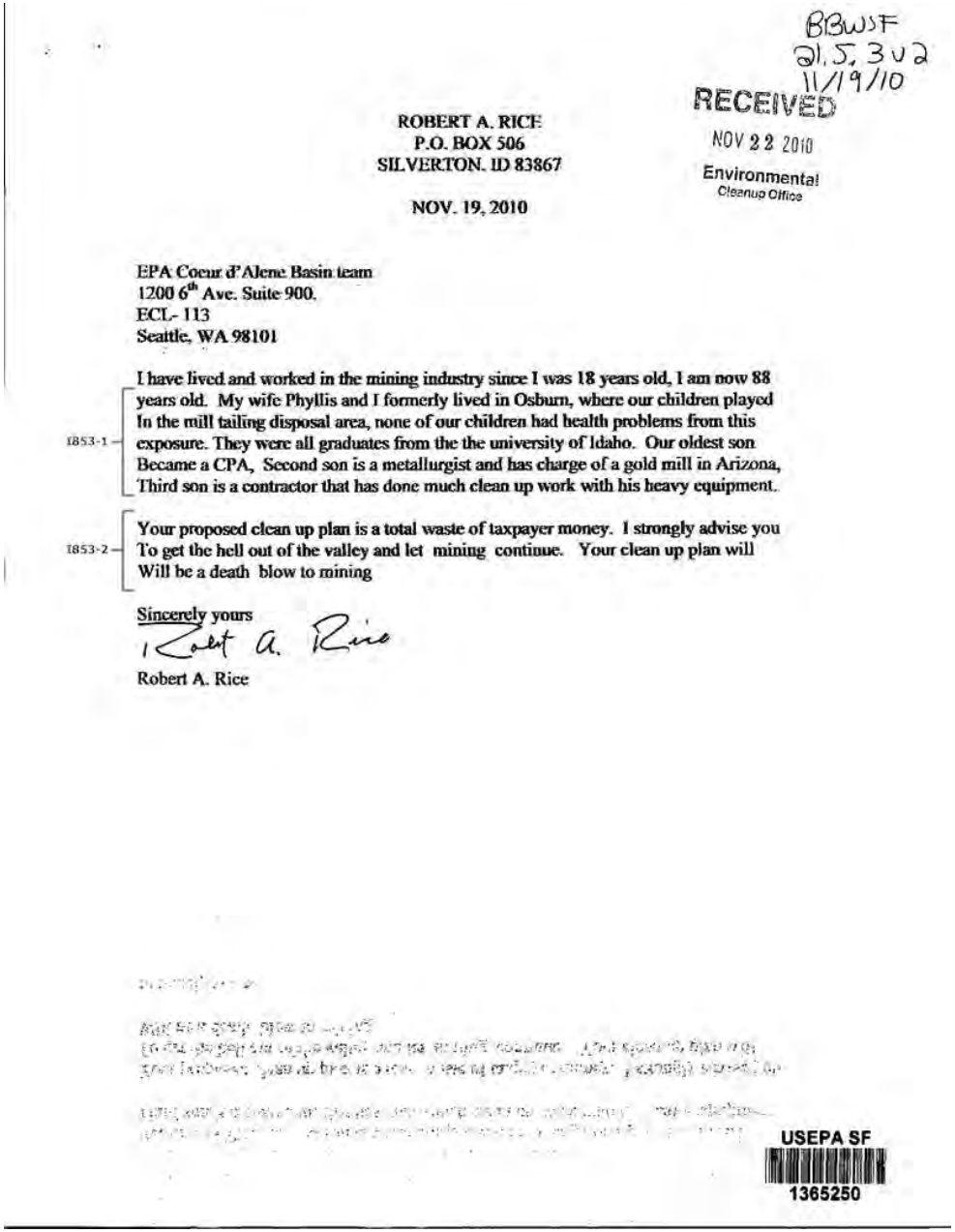
Response to comment I117-2
See response to Comment No. I58-2.

Response to comment I117-3
See response to Comment No. I58-3.

Response to comment I117-4
See response to Comment No. I58-4.

Response to comment I117-5
See response to Comment No. I58-5.

Rice, Robert A., I853, Letter 1365250



BBWSF
21.5.3v2
11/19/10

RECEIVED
NOV 22 2010
Environmental
Cleanup Office

ROBERT A. RICE
P.O. BOX 506
SILVERTON. ID 83867

NOV. 19, 2010

EPA Coeur d'Alene Basin team
1200 6th Ave. Suite 900.
ECL- 113
Seattle, WA 98101

I853-1 I have lived and worked in the mining industry since I was 18 years old, I am now 88 years old. My wife Phyllis and I formerly lived in Osburn, where our children played In the mill tailing disposal area, none of our children had health problems from this exposure. They were all graduates from the the university of Idaho. Our oldest son Became a CPA, Second son is a metallurgist and has charge of a gold mill in Arizona, Third son is a contractor that has done much clean up work with his heavy equipment.

I853-2 Your proposed clean up plan is a total waste of taxpayer money. I strongly advise you To get the hell out of the valley and let mining continue. Your clean up plan will Will be a death blow to mining

Sincerely yours
Robert A. Rice
Robert A. Rice

USEPA SF
1365250

Response to comment I853-1

See response to Comment I295-1.

Response to comment I853-2

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. EPA agrees that this is a considerable amount of money and has reduced the scope of the Selected Remedy so that the total cost is decreased. EPA's implementation planning process will also ensure that money is spent wisely to protect human health and the environment. EPA will pay for much of the proposed cleanup with funds from legal settlements between mining companies and the federal government. Please see response to Comment No. I58-5.

Rice, Justin, I736, Letter 618734

Comment on Upper basin cleanup plan
justin rice
to:
CDABasin
11/16/2010 04:19 PM
Show Details

To EPA:

I736-1 I was born July 3, 1918, in Wallace, Idaho and now in my 93rd year.

As a youngster I played in the South Fork of the Coeur d'Alene River by Third Street and now Front Street. We Were playing in the gray sand lining the creek shore.

I736-2 I have never had so called "dangerous levels of lead"; perhaps a little lead is good for humans?

I736-3 The EPA is a rouge, out of control agency! Making its own laws and science. Destroying industries in the U.S.A. For example Brockton, Massachusetts was the "Shoe Capital of the World"with 300,000 employees, the EPA refused to allow them to build new and modern tanning plants.

I736-4 True science should have been the creed of the EPA. In truth, the EPA would not be allowed to say "black is white" and vice versus.

I736-5 A modern hydro-metallurgic refinery could have been built with the money that was allowed to leave the country with the Bunker Hill Smelter bankruptcy. Money, you the EPA, were forewarned might disappear with this man, now one of the wealthiest members of Parliament.

I736-6 The Coeur d'Alene Mining District is one of the world's the richest areas of minerals extending to unknown depths. It will undoubtedly be producing 100 years from now for our great nation.

I736-7 The scenic mountains have always been beautiful with green trees, babbling streams and industrious men to extract the minerals. Enjoy this gift from Mother nature and leave us here to help our great nation produce silver, lead, zinc and copper for the modern worlds.

The EPA did not make the mountains, or the sky or the rivers or the rich ore deposits.

Respectfully,

618734

Response to comment I736-1
Thank you for your comment.

Response to comment I736-2
See response to Comment No. I295-1

Response to comment I736-3
Comment noted.

Response to comment I736-4
Comment noted.

Response to comment I736-5
Comment noted.

Response to comment I736-6
Thank you for your comment.

Response to comment I736-7
Comment noted.

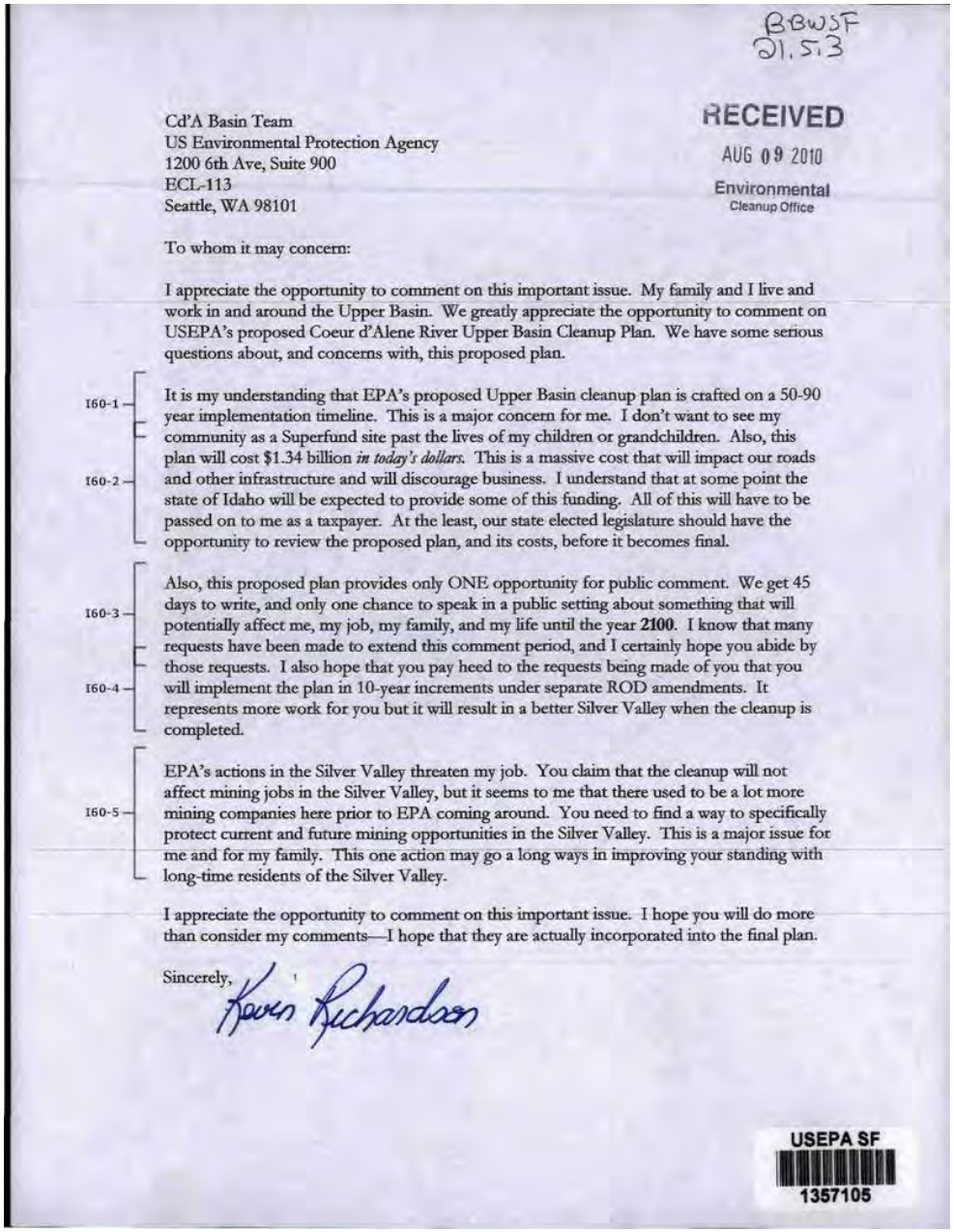
No comments

Justin L. Rice

Former President of Coeur d'Alene Mines for 30 years.

PS. I am just a "mine finder" and still at it . Leave our wonderful and capable people to handle the future.

Richardson, Kevin, I60, Letter 1357105



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I60-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I60-2

I60-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I60-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I60-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Kevin Richardson

USEPA SF
1357105

Response to comment I60-1
See response to Comment No. I58-1.

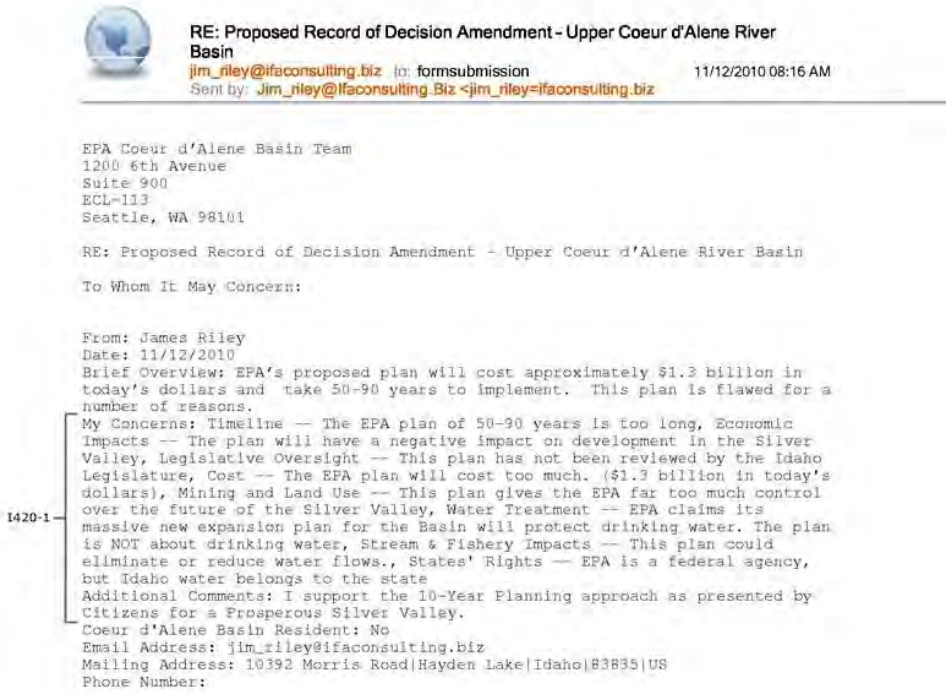
Response to comment I60-2
See response to Comment No. I58-2.

Response to comment I60-3
See response to Comment No. I58-3.

Response to comment I60-4
See response to Comment No. I58-4.

Response to comment I60-5
See response to Comment No. I58-5.

Riley, James, I420, Letter 616323



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jim_riley@ifaconsulting.biz to: formsubmission 11/12/2010 08:16 AM
Sent by: Jim_riley@Ifaconsulting.Biz <jim_riley=ifaconsulting.biz

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: James Riley
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: jim_riley@ifaconsulting.biz
Mailing Address: 10392 Morris Road|Hayden Lake|Idaho|83835|US
Phone Number:

I420-1

616323

Response to comment I420-1

See response to Comment No. I351-1.

Rinaldi, Jill, I739, Letter 618737

Upper Basin of the CDA River
jillkrinaldi to: CDABasin 11/19/2010 09:04 AM

Attention:EPA

I739-1 In regards to your proposal for the cleaning up contamination, I am not convinced that the plan will create more problems than it may solve. The science appears to be weak in regards to the quality of water from the higher regions prior to the mining industry's presence.

I739-2 Secondly, there is not any cluster of health related issues from over 100 years at this point in time. The level of lead in the blood samples have certainly seen a dramatic decline.

I739-3 Changing where the water naturally flows will alter the entire ecology of the area and where does water adjudication fit into this plan?

I739-4 The extensive use of roads with the heavy trucks will cause incredible damage and you have not been reponsible for the road infrastructure or replacement costs.

I739-5 The monies that you are proposing with the scope of the project would be better used to discover a treatment to neutralize the components rather than try to hide them for future generations to have to deal with.

Cordlally,
Jill Rinaldi

618737

Response to comment I739-1

See response to Comment No. LC33-8.

Response to comment I739-2

There are serious risks to human health from heavy metal contamination in the Basin. The risks are well documented. EPA has a regulatory responsibility to address these risks. Lead is of most concern, especially for young children and pregnant women. Though much cleanup work has been done, there is more work to do to protect people. Cleaning up contamination in the Upper Basin will reduce the amount of metals that flows downstream through communities. Also, some of the work done under this ROD Amendment will help keep cleaned-up areas clean. It will address tributary flooding, which can spread contamination. Also see the ROD Amendment, Part 3, Section 3.2.4.

Response to comment I739-3

See responses to Comment Nos. I54-8 and SA4-12.

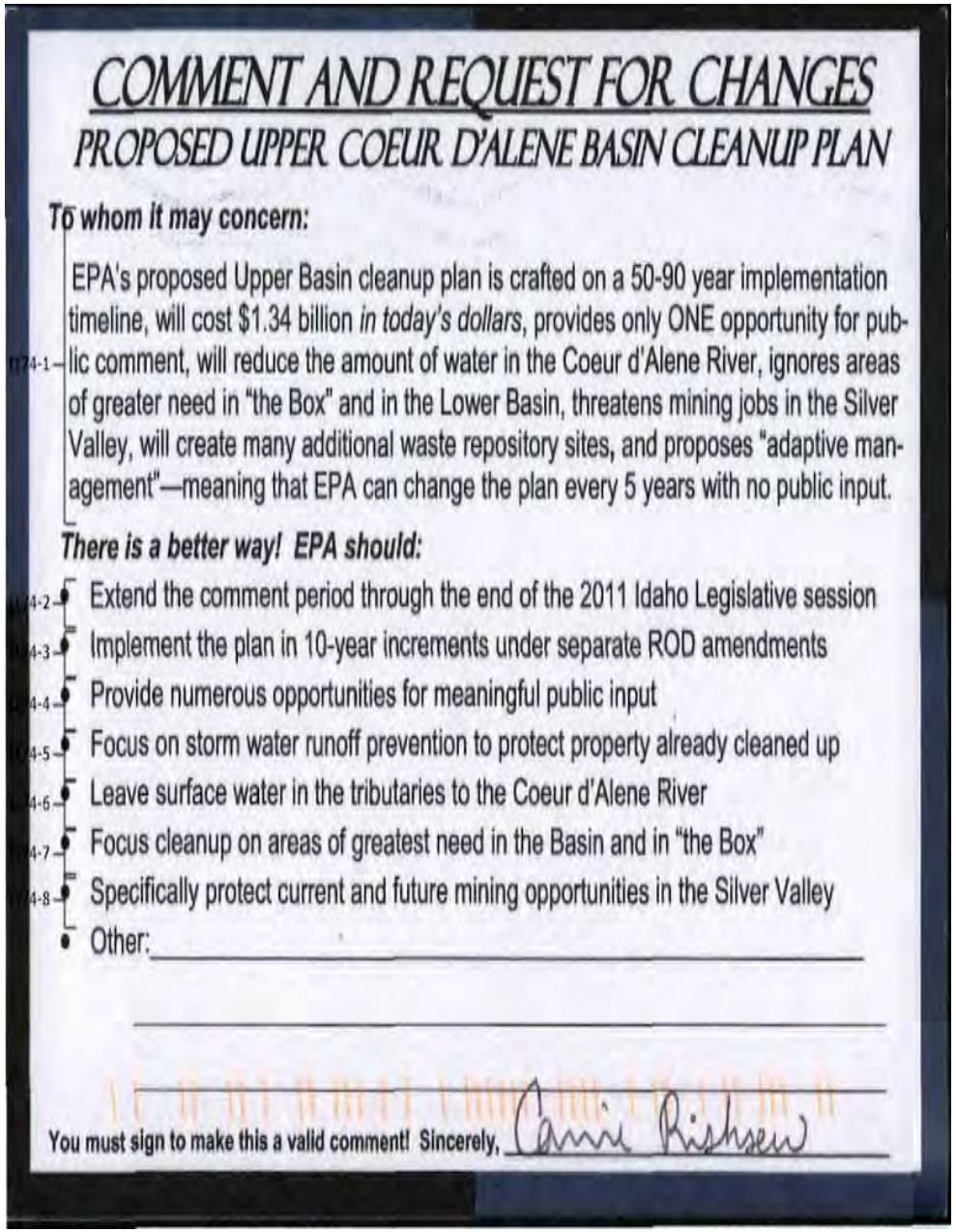
Response to comment I739-4

There will be some temporary impacts to roads and other infrastructure during the implementation of some cleanup actions within the Selected Remedy. However, the total cost estimate includes estimates for providing such road maintenance and improvement. EPA also recognizes that that many paved roads in the Basin serve as protective barriers between contaminated materials that lie under those surfaces. To address this issue EPA is developing, in coordination with IDEQ and local jurisdictions, a roads surface remediation strategy which will provide funding for local jurisdictions to conduct a significant number of road projects for this purpose.

Response to comment I739-5

As described in the ROD Amendment, the remedy selection process was a careful, National Oil and Hazardous Substances Pollution Contingency Plan-consistent process that applied appropriate technologies to the problems encountered. The cleanup actions identified in the selected remedy include collection and treatment of contaminated groundwater to remove metals.

Rishew, Carrie, I174, Letter 1357367



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I174-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I174-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I174-3 Implement the plan in 10-year increments under separate ROD amendments
- I174-4 Provide numerous opportunities for meaningful public input
- I174-5 Focus on storm water runoff prevention to protect property already cleaned up
- I174-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I174-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I174-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Carrie Rishew

Response to comment I174-1
See response to Comment No. I25-1.

Response to comment I174-2
See response to Comment No. I25-2.

Response to comment I174-3
See response to Comment No. I25-3.

Response to comment I174-4
See response to Comment No. I25-4.

Response to comment I174-5
See response to Comment No. I25-5.

Response to comment I174-6
See response to Comment No. I25-6.

Response to comment I174-7
See response to Comment No. I25-7.

Response to comment I174-8
See response to Comment No. I25-8.

Robertson, Donna, I741, Letter 618739

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
hwrobertson@bmi.net to: formsubmission 11/19/2010 08:57 AM
Sent by: Hwrobertson@Bmi.Net <hwrobertson=bmi.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: donna robertson
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I741-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: hwrobertson@bmi.net
Mailing Address: 3696 sky harbor dr., same|coeur d alene|id.|83814|US
Phone Number:

618739

Response to comment I741-1

See response to Comment No. I351-1.

Robertson, Harry, I740, Letter 618738

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

hwrobertson@bmi.net to: formsubmission 11/18/2010 11:49 AM

Sent by: Hwrobertson@Bmi.Net <hwrobertson=bmi.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: harry robertson
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: hwrobertson@bmi.net
Mailing Address: 3696 sky harbor dr, same|coeur d alene|id|83814|US
Phone Number: (208) 771-0093

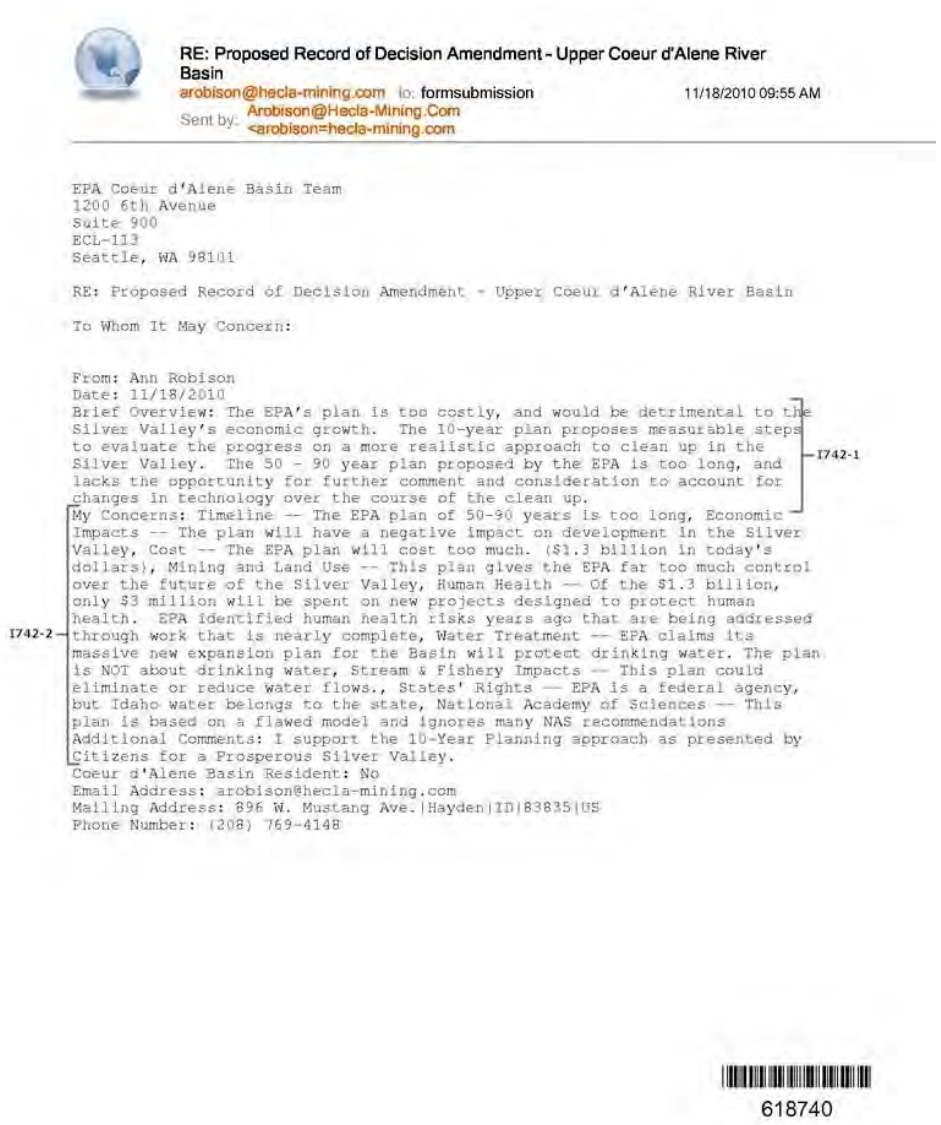
I740-1

618738

Response to comment I740-1

See response to Comment No. I351-1.

Robinson, Ann, I742, Letter 618740



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
arobison@hecla-mining.com to: formsubmission 11/18/2010 09:55 AM
Sent by: Arobison@Hecla-Mining.Com <arobison=hecla-mining.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Ann Robison
Date: 11/18/2010
Brief Overview: The EPA's plan is too costly, and would be detrimental to the Silver Valley's economic growth. The 10-year plan proposes measurable steps to evaluate the progress on a more realistic approach to clean up in the Silver Valley. The 50 - 90 year plan proposed by the EPA is too long, and lacks the opportunity for further comment and consideration to account for changes in technology over the course of the clean up. I742-1

My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. I742-2

Coeur d'Alene Basin Resident: No
Email Address: arobison@hecla-mining.com
Mailing Address: 896 W. Mustang Ave.|Hayden|ID|83835|US
Phone Number: (208) 769-4148

618740

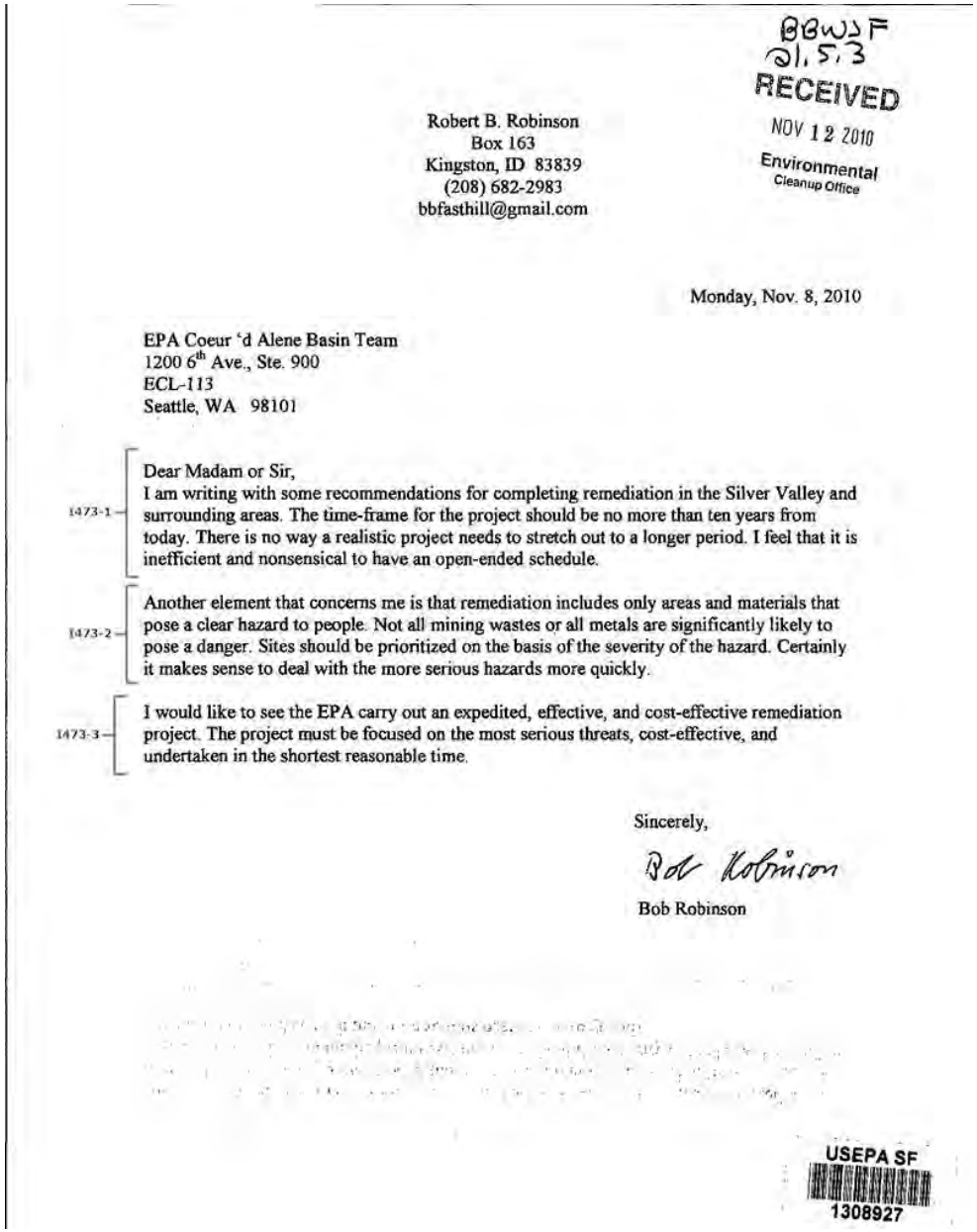
Response to comment I742-1

See responses to Comment Nos. I58-2, I474-1, I474-2, I58-1, and LJ11-2.

Response to comment I742-2

See response to Comment No. I351-1.

Robinson, Bob, I473, Letter 1308927



BBWSF
21,5,3
RECEIVED
NOV 12 2010
Environmental
Cleanup Office

Robert B. Robinson
Box 163
Kingston, ID 83839
(208) 682-2983
bbfasthill@gmail.com

Monday, Nov. 8, 2010

EPA Coeur 'd Alene Basin Team
1200 6th Ave., Ste. 900
ECL-113
Seattle, WA 98101

I473-1 Dear Madam or Sir,
I am writing with some recommendations for completing remediation in the Silver Valley and surrounding areas. The time-frame for the project should be no more than ten years from today. There is no way a realistic project needs to stretch out to a longer period. I feel that it is inefficient and nonsensical to have an open-ended schedule.

I473-2 Another element that concerns me is that remediation includes only areas and materials that pose a clear hazard to people. Not all mining wastes or all metals are significantly likely to pose a danger. Sites should be prioritized on the basis of the severity of the hazard. Certainly it makes sense to deal with the more serious hazards more quickly.

I473-3 I would like to see the EPA carry out an expedited, effective, and cost-effective remediation project. The project must be focused on the most serious threats, cost-effective, and undertaken in the shortest reasonable time.

Sincerely,

Bob Robinson

Bob Robinson

USEPA SF
1308927

Response to comment I473-1

See responses to Comment Nos. I58-1 and I474-2.

Response to comment I473-2

With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT, EPA has developed a logical and transparent prioritization process over the past two years. EPA will continue to prioritize remedial actions included in this Selected Remedy using these processes as more data are gathered and the effectiveness of the initial remedial actions is determined. As described in more detail below, updates of and changes to the Selected Remedy implementation schedule, priorities, and/or sequencing will be documented through the Implementation Plan and Basin Commission work plans. The following specific issues, at a minimum, will be considered to prioritize, schedule, and sequence specific actions that are part of the Selected Remedy:

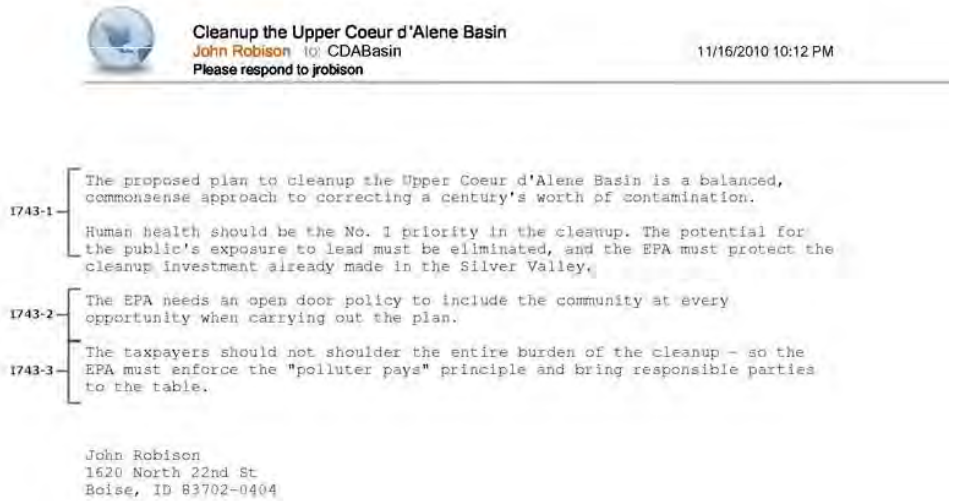
- Human health exposure to contaminated mine waste materials. EPA will place a higher priority on sites that present current exposure risk to individuals from contaminated mine wastes, including exposures that may occur from damage to existing Selected Human Health Remedies in the Upper Basin communities.
- Metals loading to surface water. EPA will prioritize the implementation of remedial actions at sites based on each site's potential to add metals, such as lead and zinc, to groundwater and surface water.
- Potential for recontamination of cleaned areas. EPA will prioritize the implementation of remedial actions in order to reduce the potential for recontamination of previously remediated areas.

This typically means conducting work at sites that are topographically higher in a drainage area first, in order to avoid recontamination from sites above them. For further information regarding prioritization see the ROD Amendment, Part 2, Section 12.3.3.

Response to comment I473-3

Comment noted. Please see response to Comment No. I822-14, which discusses how EPA reduced the scope of the Selected Remedy in comparison to the Preferred Alternative identified in the Proposed Plan.

Robison, John, I743, Letter 618741



Cleanup the Upper Coeur d'Alene Basin
John Robison to: CDABasin 11/16/2010 10:12 PM
Please respond to jrobison

I743-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination.

Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I743-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I743-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

John Robison
1620 North 22nd St
Boise, ID 83702-0404

618741

Response to comment I743-1

See response to Comment No. I295-1.

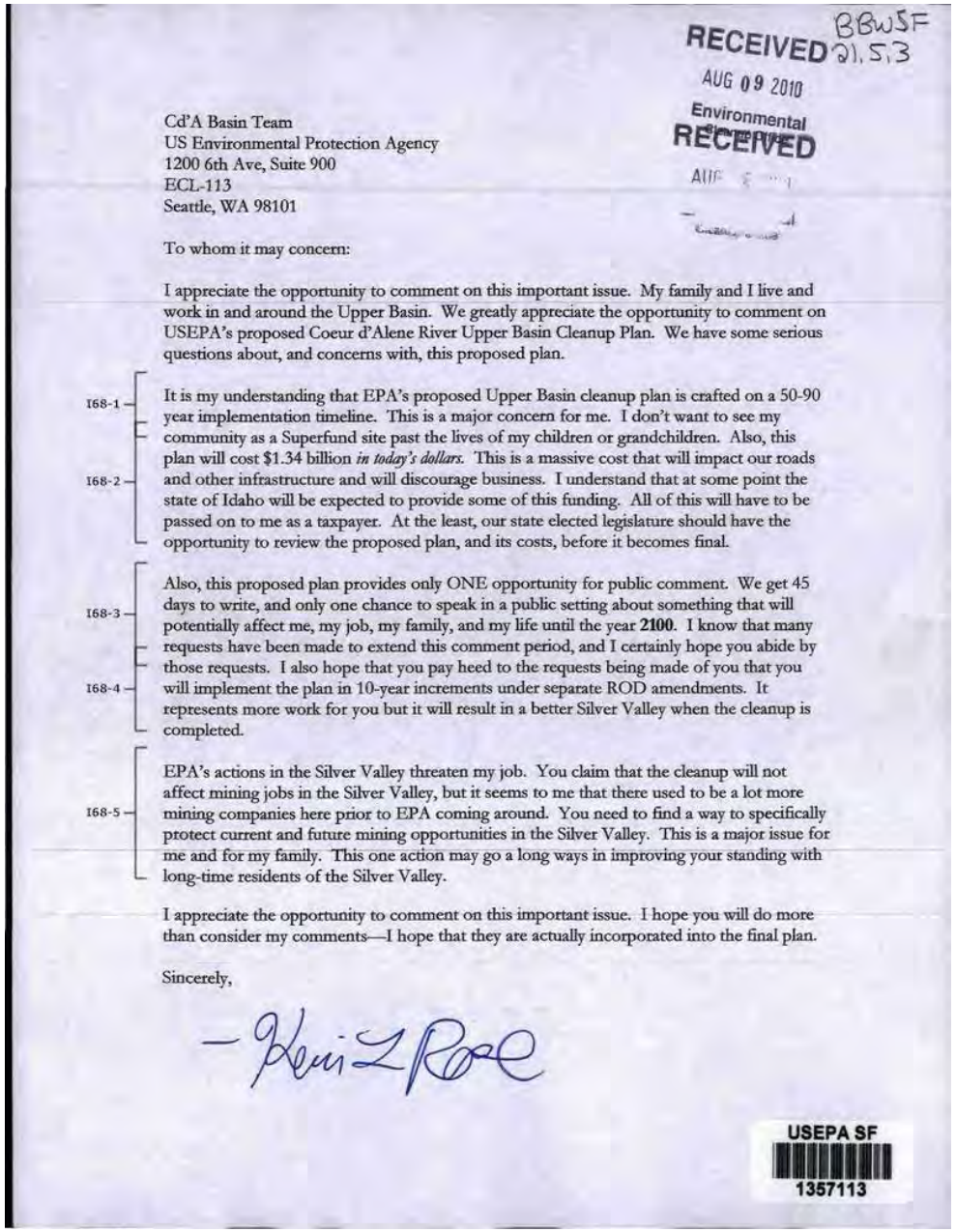
Response to comment I743-2

See response to Comment No. I295-2.

Response to comment I743-3

See response to Comment No. I295-3.

Roe, Kevin, I68, Letter 1357113



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21.5.13

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Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I68-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I68-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I68-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I68-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I68-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

-Kevin Roe

USEPA SF
1357113

Response to comment I68-1
See response to Comment No. I58-1.

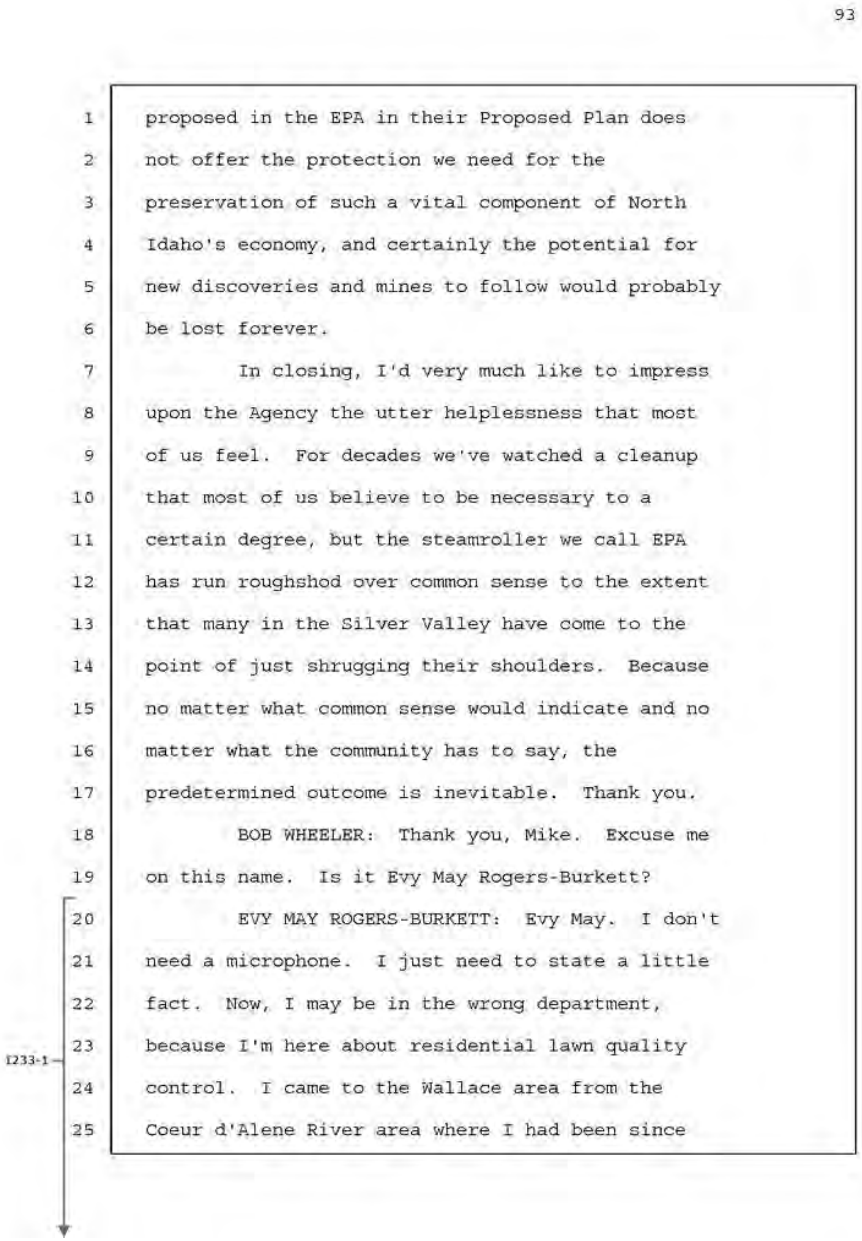
Response to comment I68-2
See response to Comment No. I58-2.

Response to comment I68-3
See response to Comment No. I58-3.

Response to comment I68-4
See response to Comment No. I58-4.

Response to comment I68-5
See response to Comment No. I58-5.

Rogers-Burkett, Evy May, I233, Letter 610097-28



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proposed in the EPA in their Proposed Plan does not offer the protection we need for the preservation of such a vital component of North Idaho's economy, and certainly the potential for new discoveries and mines to follow would probably be lost forever.

In closing, I'd very much like to impress upon the Agency the utter helplessness that most of us feel. For decades we've watched a cleanup that most of us believe to be necessary to a certain degree, but the steamroller we call EPA has run roughshod over common sense to the extent that many in the Silver Valley have come to the point of just shrugging their shoulders. Because no matter what common sense would indicate and no matter what the community has to say, the predetermined outcome is inevitable. Thank you.

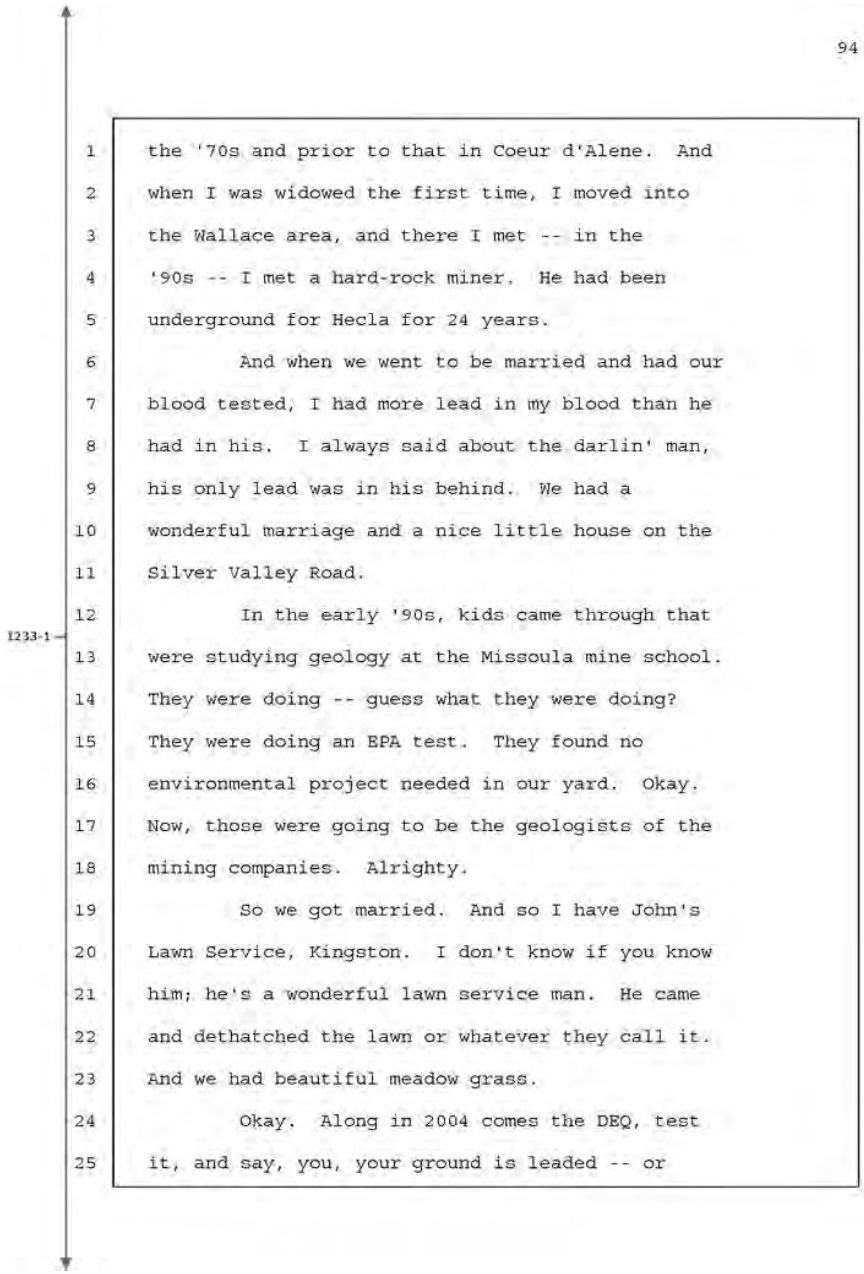
BOB WHEELER: Thank you, Mike. Excuse me on this name. Is it Evy May Rogers-Burkett?

EVY MAY ROGERS-BURKETT: Evy May. I don't need a microphone. I just need to state a little fact. Now, I may be in the wrong department, because I'm here about residential lawn quality control. I came to the Wallace area from the Coeur d'Alene River area where I had been since

I233-1

Response to comment I233-1

Thank you for your comment.



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the '70s and prior to that in Coeur d'Alene. And when I was widowed the first time, I moved into the Wallace area, and there I met -- in the '90s -- I met a hard-rock miner. He had been underground for Hecla for 24 years.

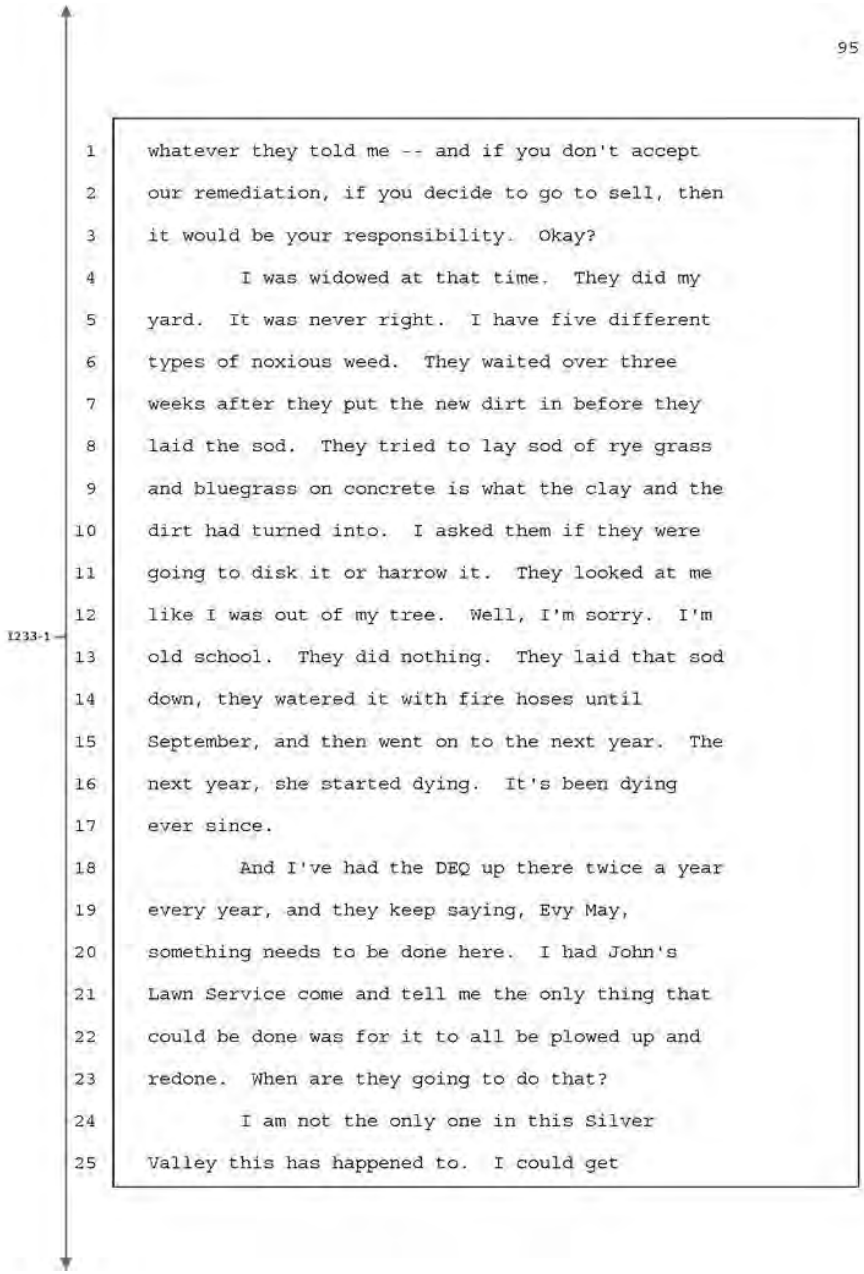
And when we went to be married and had our blood tested, I had more lead in my blood than he had in his. I always said about the darlin' man, his only lead was in his behind. We had a wonderful marriage and a nice little house on the Silver Valley Road.

I233-1 In the early '90s, kids came through that were studying geology at the Missoula mine school. They were doing -- guess what they were doing? They were doing an EPA test. They found no environmental project needed in our yard. Okay. Now, those were going to be the geologists of the mining companies. Alrighty.

So we got married. And so I have John's Lawn Service, Kingston. I don't know if you know him; he's a wonderful lawn service man. He came and dethatched the lawn or whatever they call it. And we had beautiful meadow grass.

Okay. Along in 2004 comes the DEQ, test it, and say, you, your ground is leaded -- or

No comments



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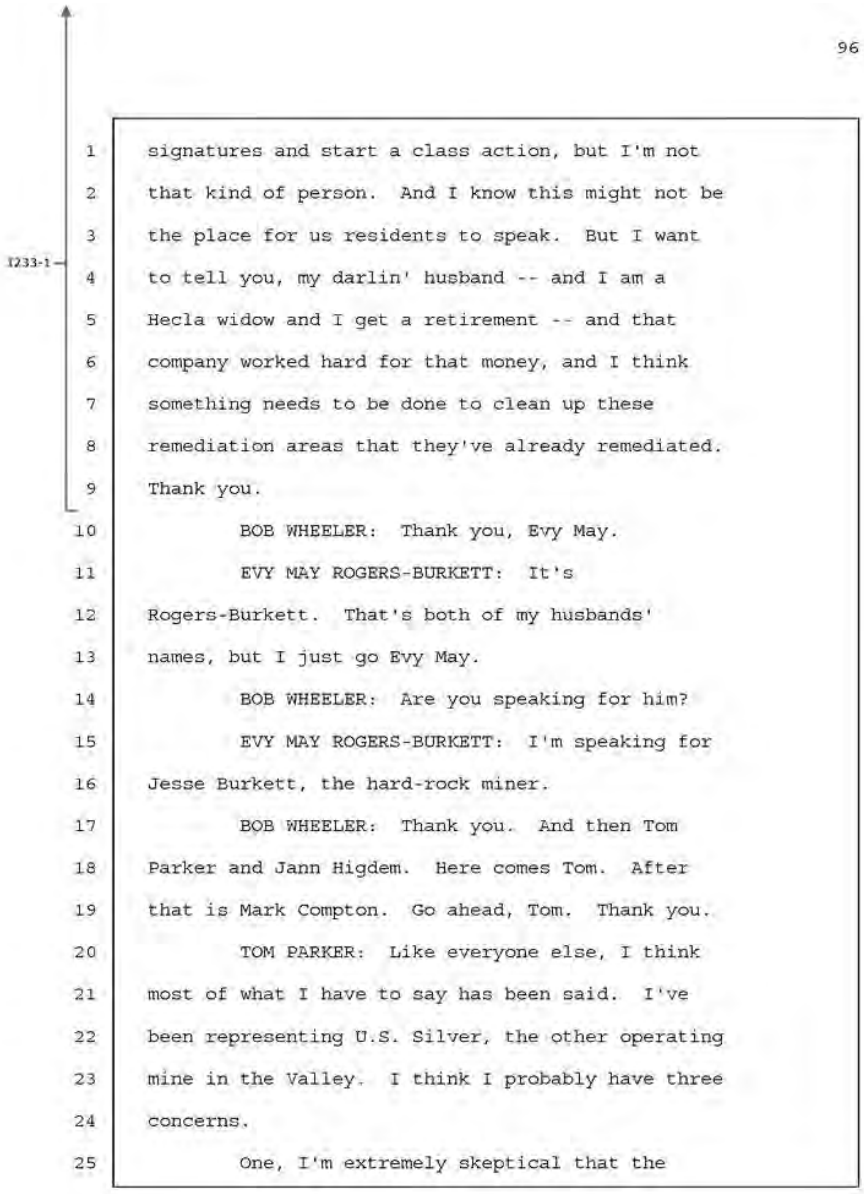
whatever they told me -- and if you don't accept our remediation, if you decide to go to sell, then it would be your responsibility. Okay?

I was widowed at that time. They did my yard. It was never right. I have five different types of noxious weed. They waited over three weeks after they put the new dirt in before they laid the sod. They tried to lay sod of rye grass and bluegrass on concrete is what the clay and the dirt had turned into. I asked them if they were going to disk it or harrow it. They looked at me like I was out of my tree. Well, I'm sorry. I'm I233-1 old school. They did nothing. They laid that sod down, they watered it with fire hoses until September, and then went on to the next year. The next year, she started dying. It's been dying ever since.

And I've had the DEQ up there twice a year every year, and they keep saying, Evy May, something needs to be done here. I had John's Lawn Service come and tell me the only thing that could be done was for it to all be plowed up and redone. When are they going to do that?

I am not the only one in this Silver Valley this has happened to. I could get

No comments



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I233-1

signatures and start a class action, but I'm not that kind of person. And I know this might not be the place for us residents to speak. But I want to tell you, my darlin' husband -- and I am a Hecla widow and I get a retirement -- and that company worked hard for that money, and I think something needs to be done to clean up these remediation areas that they've already remediated. Thank you.

BOB WHEELER: Thank you, Evy May.

EVY MAY ROGERS-BURKETT: It's Rogers-Burkett. That's both of my husbands' names, but I just go Evy May.

BOB WHEELER: Are you speaking for him?

EVY MAY ROGERS-BURKETT: I'm speaking for Jesse Burkett, the hard-rock miner.

BOB WHEELER: Thank you. And then Tom Parker and Jann Higdem. Here comes Tom. After that is Mark Compton. Go ahead, Tom. Thank you.

TOM PARKER: Like everyone else, I think most of what I have to say has been said. I've been representing U.S. Silver, the other operating mine in the Valley. I think I probably have three concerns.

One, I'm extremely skeptical that the

No comments

Rollins, Brandi, I744, Letter 618742

EPA Proposed Rod Amendment Comments - Deadline Nov 23 2010
brandir
to:
CDABasin
11/23/2010 12:14 PM
Show Details

Brandi Rollins
14927 S. Hwy. 3 Cataldo, ID 83810
208-682-4988
brandir@usa.com

To whom it may concern:

I744-1 The bottom line is that I do and do not agree with portions of the ROD amendment as you are currently proposing.
I have worked both in mining in the Silver Valley as well as the Superfund cleanup (primarily the yard programs – both box and basin). Having seen both sides and being a local as well, I think I have a bit of understanding of some of what you're dealing with.
I do understand that this is a huge project and it's not something to be taken lightly. There are many aspects to the "clean-up" and I'm not sure anyone can grasp the whole project (yards, water, human health, habitat health…) in great detail, only as an overview of the big picture. Hence, communication between departments/agencies is very important for all the pieces to fit together correctly and efficiently.

I do support the following:

I744-2 Additional work on "protecting the remedy" such as culverts, ditches, bank stabilization, curbs/gutters… Protecting the remedy and money/time spent is important and worthwhile. I can see direct results occurring from this.

I744-3 I agree that putting some processes in place to help lower the contamination in Canyon Creek and some of the nastier mine sites should happen. If a dump is directly in a creek bed, it's not a bad thing to remove it and place it somewhere else (on-site) to help lower the amount contaminates being washed downstream. A giant pipeline just doesn't seem like a "fix" that is necessary.

I do NOT support the following:

I744-4 From what I've heard from both the mining side and the EPA side, I don't feel that your database/model is as accurate as maybe it should be. If you don't know what all the issues are, how do you prioritize site clean-ups as well as

618742

Response to comment I744-1

Thank you for your comment. See response to Comment No. I295-2.

Response to comment I744-2

See response to Comment No. I54-5.

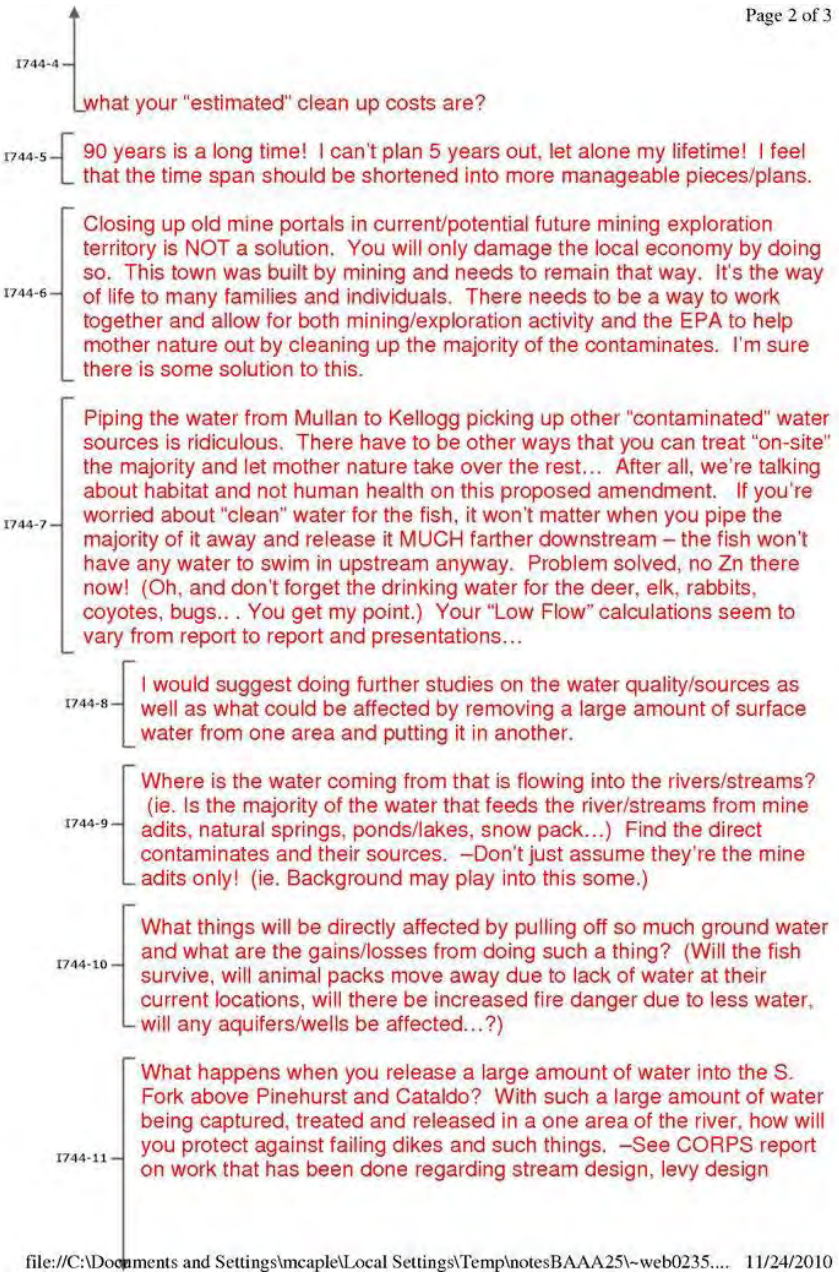
Response to comment I744-3

Contaminant sources are grouped into two types in the Proposed Plan (EPA, 2010, http://www.epa.gov/region10/pdf/sites/bunker_hill/upper_basin_final_pp_0710.pdf): primary sources and secondary sources. Primary contaminant sources are discrete and consist of tailings, waste rock, and adit drainage. Secondary contaminant sources are diffuse and consist of contaminated floodplain tailings and contaminated materials underlying infrastructure. This underlying mine waste cannot be removed without disrupting the populated communities in the Upper Basin, and EPA has committed not to take such action. Many of these inaccessible sources contribute substantial dissolved metals loading to groundwater, which ultimately leads to surface water contamination. Water treatment is a key part of the Selected Remedy because it will (1) address subsurface materials too deep or impractical to be removed, (2) generally provide a high degree of metals load reductions for a relatively low cost, and (3) achieve immediate improvements to water quality. Studies conducted by EPA found that for some areas within the Upper Basin, collection of groundwater and treatment at the Central Treatment Plant (CTP) in Kellogg is the lowest-cost treatment option.

Response to comment I744-4

The ROD Amendment, including the Selected Remedy, was developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. EPA's goal is to complete the cleanup in the Basin as quickly as possible and with minimum disruption. EPA is required by law to ensure protection of human health and the environment. The Upper Basin is a large area with complicated contamination issues that have evolved over a long period of time. The extent and nature of the contamination dictate that it will take substantial time and resources to clean up. The ROD Amendment

provides details regarding the implementation approach for the Selected Remedy, including where the work starts and how it will proceed over time. With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT over the last several years, EPA developed a logical and transparent prioritization process for cleanup actions. Using this prioritization process, the Selected Remedy, an interim action, focuses on a prioritized set of cleanup actions. The actions include the most contaminated drainages (i.e., Ninemile and Canyon Creeks), areas that have the greatest adverse impact on groundwater and surface water (e.g., OU 2), and areas that provide protection for existing remedies. This process of prioritizing actions included in the Selected Remedy is consistent with the adaptive management approach. The estimated time for implementing the Selected Remedy is about thirty years.



Page 2 of 3

I744-4 what your "estimated" clean up costs are?

I744-5 90 years is a long time! I can't plan 5 years out, let alone my lifetime! I feel that the time span should be shortened into more manageable pieces/plans.

I744-6 Closing up old mine portals in current/potential future mining exploration territory is NOT a solution. You will only damage the local economy by doing so. This town was built by mining and needs to remain that way. It's the way of life to many families and individuals. There needs to be a way to work together and allow for both mining/exploration activity and the EPA to help mother nature out by cleaning up the majority of the contaminates. I'm sure there is some solution to this.

I744-7 Piping the water from Mullan to Kellogg picking up other "contaminated" water sources is ridiculous. There have to be other ways that you can treat "on-site" the majority and let mother nature take over the rest… After all, we're talking about habitat and not human health on this proposed amendment. If you're worried about "clean" water for the fish, it won't matter when you pipe the majority of it away and release it MUCH farther downstream – the fish won't have any water to swim in upstream anyway. Problem solved, no Zn there now! (Oh, and don't forget the drinking water for the deer, elk, rabbits, coyotes, bugs.. . You get my point.) Your "Low Flow" calculations seem to vary from report to report and presentations…

I744-8 I would suggest doing further studies on the water quality/sources as well as what could be affected by removing a large amount of surface water from one area and putting it in another.

I744-9 Where is the water coming from that is flowing into the rivers/streams? (ie. Is the majority of the water that feeds the river/streams from mine adits, natural springs, ponds/lakes, snow pack…) Find the direct contaminates and their sources. –Don't just assume they're the mine adits only! (ie. Background may play into this some.)

I744-10 What things will be directly affected by pulling off so much ground water and what are the gains/losses from doing such a thing? (Will the fish survive, will animal packs move away due to lack of water at their current locations, will there be increased fire danger due to less water, will any aquifers/wells be affected…?)

I744-11 What happens when you release a large amount of water into the S. Fork above Pinehurst and Cataldo? With such a large amount of water being captured, treated and released in a one area of the river, how will you protect against failing dikes and such things. –See CORPS report on work that has been done regarding stream design, levy design

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Response to comment I744-5

See response to Comment No. I58-1.

Response to comment I744-6

See response to Comment No. I58-5.

Response to comment I744-7

With regard to stream flow reduction, see response to Comment No. I54-8. With regard to treatment technology selection (i.e., onsite passive systems versus centralized active systems), see response to Comment No. I899-7.

Response to comment I744-8

See response to Comment No. I54-8.

Response to comment I744-9

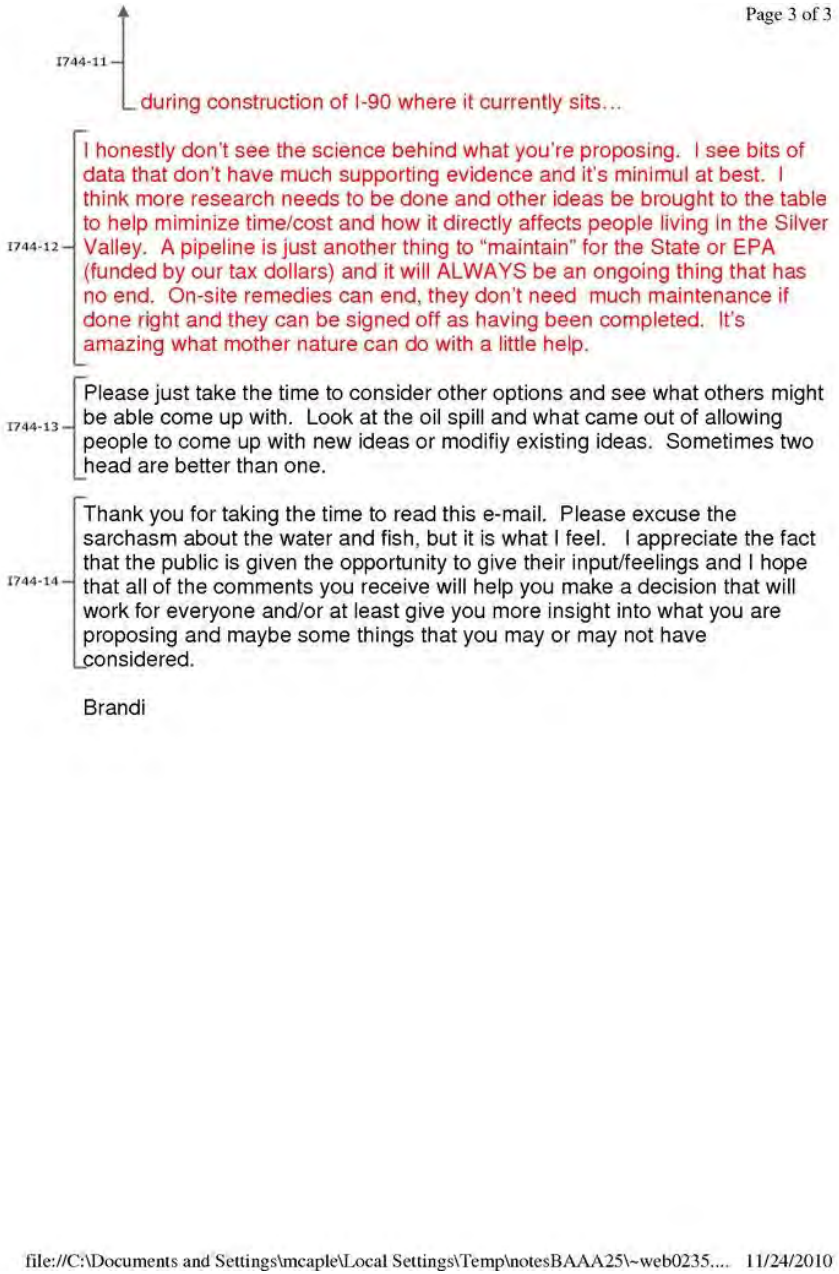
A great deal of the metals loading to rivers and streams in the Upper Basin is due to surface water runoff coming in contact with mining-contaminated materials. The Selected Remedy includes actions to isolate these materials, either through capping and vegetation on site or excavation and disposal in a local waste consolidation area or regional repository. Additional sources of metals loading to surface water include contaminated groundwater and adit discharges. These sources will also be addressed by the Selected Remedy through collection and treatment. Water treatment is a key part of the Selected Remedy because it will (1) address subsurface materials too deep or impractical to be removed, (2) generally provide a high degree of metals load reduction for a relatively low cost, and (3) achieve immediate improvements to water quality. Also see response to Comment No. LC33-8.

Response to comment I744-10

See response to Comment No. I54-8.

Response to comment I744-11

There will be no net increase in the amount of water discharged into the SFCDR. The stream flow reduction will only occur for a small stretch of river between the collection points in Osburn and Canyon Creek and Kellogg, where the same volume of clean treated water will be returned to the SFCDR.



Page 3 of 3

I744-11 during construction of I-90 where it currently sits…

I744-12 I honestly don't see the science behind what you're proposing. I see bits of data that don't have much supporting evidence and it's minimul at best. I think more research needs to be done and other ideas be brought to the table to help miminize time/cost and how it directly affects people living in the Silver Valley. A pipeline is just another thing to "maintain" for the State or EPA (funded by our tax dollars) and it will ALWAYS be an ongoing thing that has no end. On-site remedies can end, they don't need much maintenance if done right and they can be signed off as having been completed. It's amazing what mother nature can do with a little help.

I744-13 Please just take the time to consider other options and see what others might be able come up with. Look at the oil spill and what came out of allowing people to come up with new ideas or modifiy existing ideas. Sometimes two head are better than one.

I744-14 Thank you for taking the time to read this e-mail. Please excuse the sarchasm about the water and fish, but it is what I feel. I appreciate the fact that the public is given the opportunity to give their input/feelings and I hope that all of the comments you receive will help you make a decision that will work for everyone and/or at least give you more insight into what you are proposing and maybe some things that you may or may not have considered.

Brandi

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Response to comment I744-12

A significant amount of the mining-related contamination in the Upper Basin lies in fill material used beneath roads, communities, and infrastructure. EPA does not consider removal of this contamination to be feasible, given the disruption to the community that would be required. It is in these areas (Woodland Park, Osburn, and the Bunker Hill Box) that groundwater will be collected as a means of preventing the flow of contaminants to the SFCDR and its tributaries. Onsite water treatment will be used for some contaminated adit discharges, as described in response to Comment No. I899-7. In addition, onsite source control actions will be used throughout the Upper Basin, where contaminated materials are accessible for remediation to reduce the loading of metals to the SFCDR and its tributaries.

Response to comment I744-13

Thank you for your comment.

Response to comment I744-14

Thank you for your comments.

Roose, Marjorie, I91, Letter 1357138

COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I91-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I91-2 Extend the comment period an additional 90 days
- I91-3 Implement the plan in 10-year increments under separate ROD amendments
- I91-4 Provide numerous opportunities for meaningful public input
- I91-5 Focus on storm water runoff prevention to protect property already cleaned up
- I91-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I91-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I91-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, Marjorie S. Roose

Response to comment I91-1
See response to Comment No. I25-1.

Response to comment I91-2
See response to Comment No. I25-2.

Response to comment I91-3
See response to Comment No. I25-3.

Response to comment I91-4
See response to Comment No. I25-4.

Response to comment I91-5
See response to Comment No. I25-5.

Response to comment I91-6
See response to Comment No. I25-6.

Response to comment I91-7
See response to Comment No. I25-7.

Response to comment I91-8
See response to Comment No. I25-8.

Roripaugh, Bonnie, I745, Letter 618743

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
broripaugh@hgiworld.com to: formsubmission 11/17/2010 11:40 AM
Sent by: Broripaugh@Hgiworld.Com <broripaugh=hgiworld.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Bonnie Roripaugh
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: broripaugh@hgiworld.com
Mailing Address: Bonnie Roripaugh|Tucson|AZ|85745|US
Phone Number:

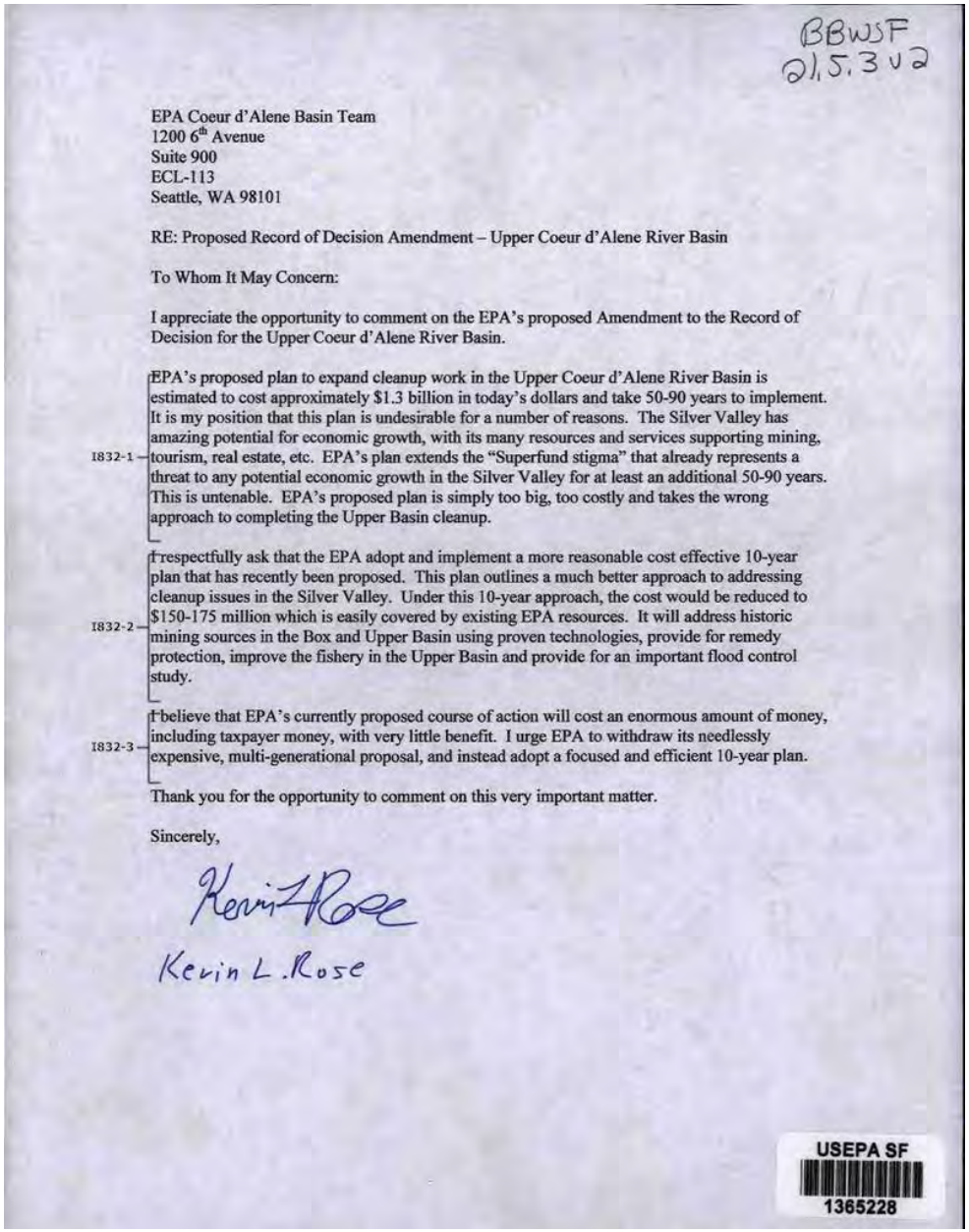
I745-1

618743

Response to comment I745-1

See response to Comment No. I351-1.

Rose, Kevin L., I832, Letter 1365228



BBWSF
21.5.3 v2

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I832-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I832-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I832-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Kevin L. Rose

Kevin L. Rose

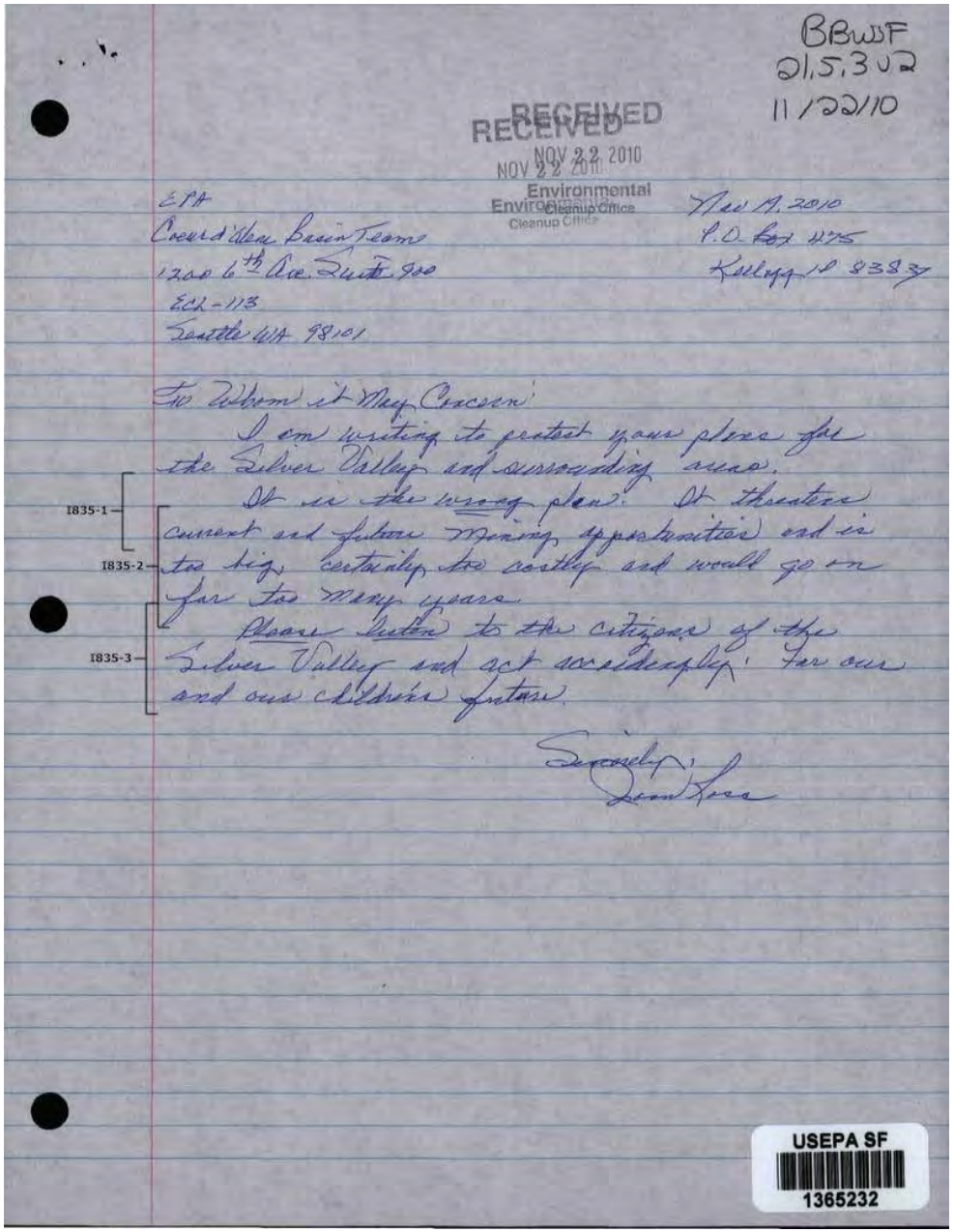
USEPA SF
1365228

Response to comment I832-1
See response to Comment No. I474-1.

Response to comment I832-2
See response to Comment No. I474-2.

Response to comment I832-3
See response to Comment No. I474-3.

Ross, Joan, I835, Letter 1365232



BBWSF
21.5.3.02
11/22/10

RECEIVED
NOV 22 2010
Environmental Cleanup Office

EPA
Coeur d'Alene Basin Team
1200 6th Ave. Suite 900
ECL-113
Seattle WA 98101

Nov 19, 2010
P.O. Box 475
Kellogg ID 83837

To Whom it May Concern:

I am writing to protest your plans for the Silver Valley and surrounding areas.

It is the wrong plan. It threatens current and future Mining opportunities and is too big, certainly too costly and would go on for too many years.

Please listen to the citizens of the Silver Valley and act accordingly. For our and our children's future.

Sincerely,
Joan Ross

I835-1
I835-2
I835-3

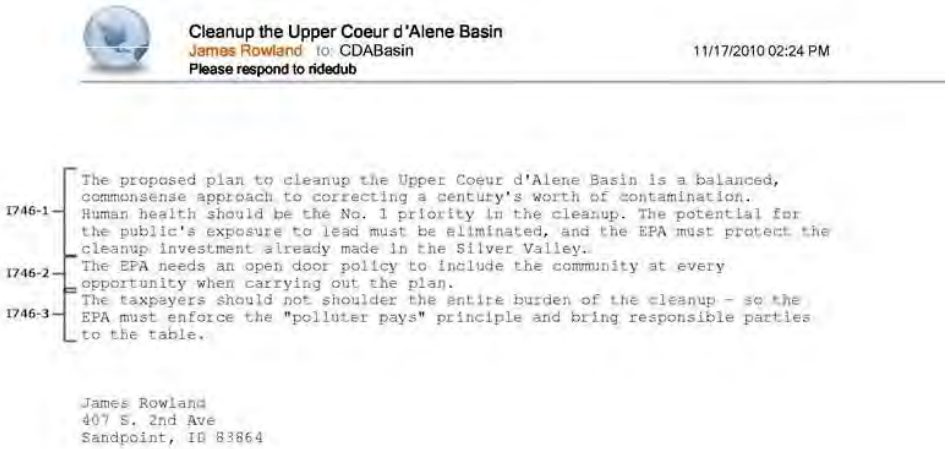
USEPA SF
1365232

Response to comment I835-1
See response to Comment No. I58-5.

Response to comment I835-2
See responses to Comment Nos. I58-1 and I58-2.

Response to comment I835-3
See response to Comment No. I295-2.

Rowland, James, I746, Letter 618744



Cleanup the Upper Coeur d'Alene Basin
James Rowland to: CDABasin 11/17/2010 02:24 PM
Please respond to ridedub

I746-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I746-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I746-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

James Rowland
407 S. 2nd Ave
Sandpoint, ID 83864

618744

Response to comment I746-1

See response to Comment No. I295-1.

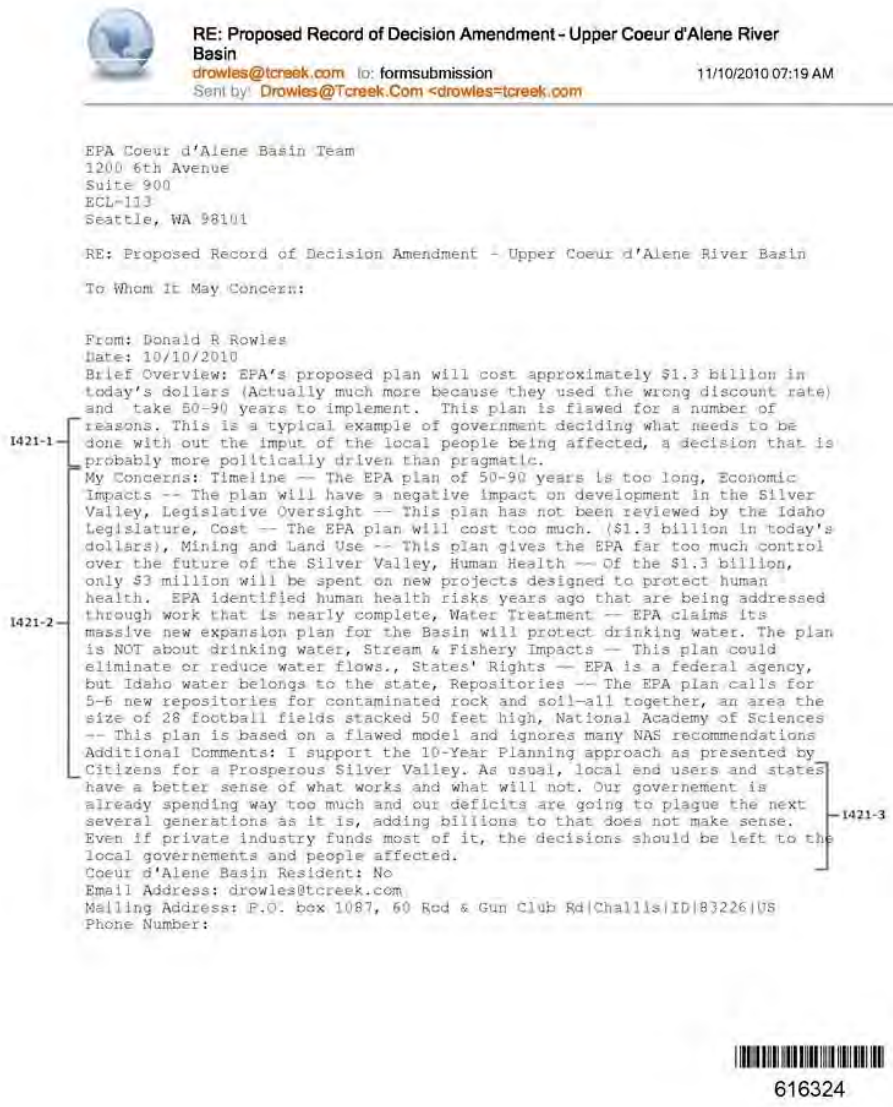
Response to comment I746-2

See response to Comment No. I295-2.

Response to comment I746-3

See response to Comment No. I295-3.

Rowles, Donald, I421, Letter 616324



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
drowles@tcreek.com to: formsubmission 11/10/2010 07:19 AM
Sent by: Drowles@Tcreek.Com <drowles=tcreek.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Donald R Rowles
Date: 10/10/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars (Actually much more because they used the wrong discount rate) and take 50-90 years to implement. This plan is flawed for a number of reasons. This is a typical example of government deciding what needs to be done with out the imput of the local people being affected, a decision that is probably more politically driven than pragmatic.
I421-1
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
I421-2
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. As usual, local end users and states have a better sense of what works and what will not. Our governement is already spending way too much and our deficits are going to plague the next several generations as it is, adding billions to that does not make sense. Even if private industry funds most of it, the decisions should be left to the local governements and people affected.
I421-3
Coeur d'Alene Basin Resident: No
Email Address: drowles@tcreek.com
Mailing Address: P.O. box 1087, 60 Rod & Gun Club Rd|Challis|ID|83226|US
Phone Number:

616324

Response to comment I421-1

See responses to Comment Nos. I295-2 and LJ39-5.

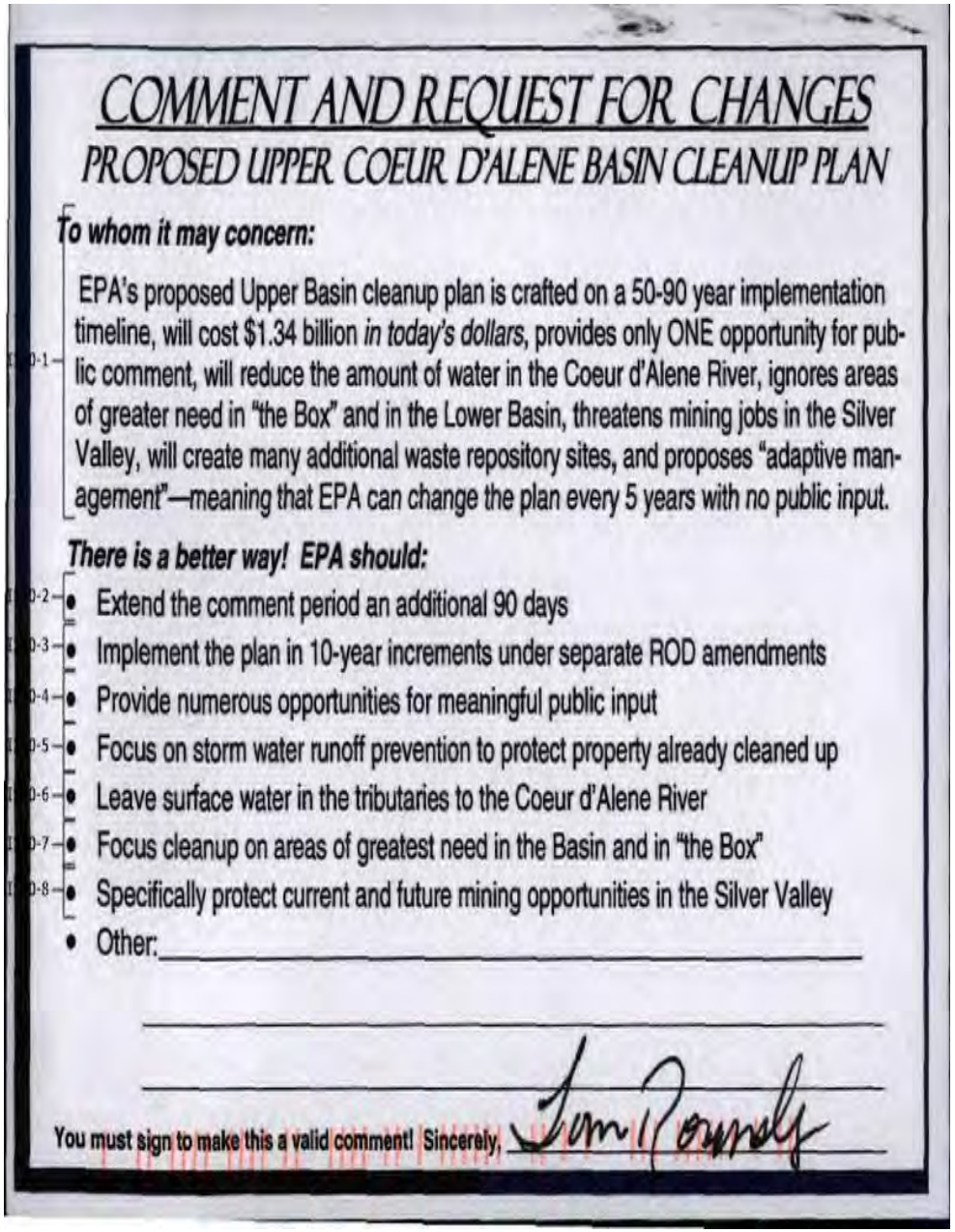
Response to comment I421-2

See response to Comment No. I351-1.

Response to comment I421-3

See response to Comment No. LJ39-5.

Rownsly, Tom, I150, Letter 1357286



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I150-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I150-2 Extend the comment period an additional 90 days
- I150-3 Implement the plan in 10-year increments under separate ROD amendments
- I150-4 Provide numerous opportunities for meaningful public input
- I150-5 Focus on storm water runoff prevention to protect property already cleaned up
- I150-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I150-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I150-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, Tom Rownsly

Response to comment I150-1
See response to Comment No. I25-1.

Response to comment I150-2
See response to Comment No. I25-2.

Response to comment I150-3
See response to Comment No. I25-3.

Response to comment I150-4
See response to Comment No. I25-4.

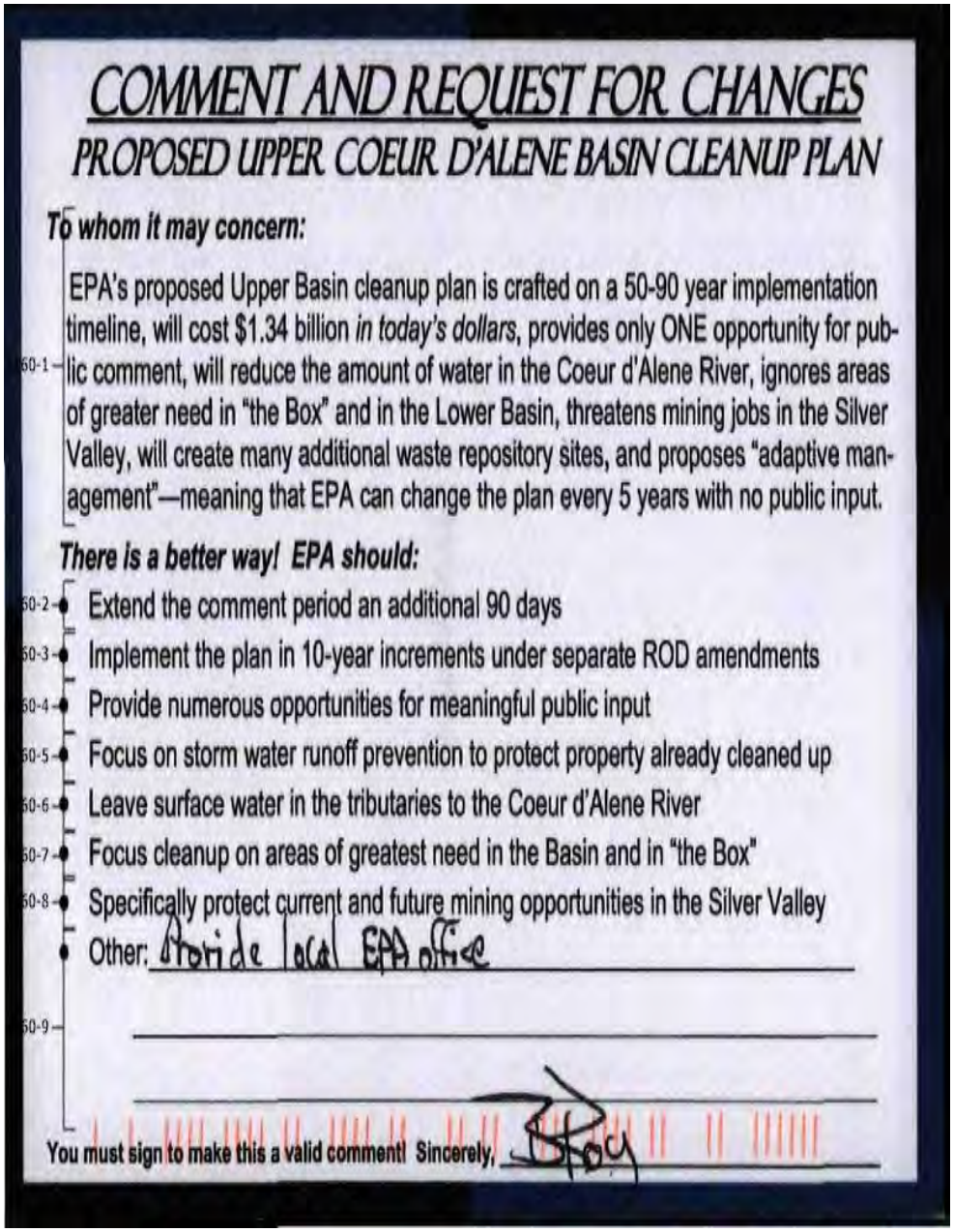
Response to comment I150-5
See response to Comment No. I25-5.

Response to comment I150-6
See response to Comment No. I25-6.

Response to comment I150-7
See response to Comment No. I25-7.

Response to comment I150-8
See response to Comment No. I25-8.

Roy, B., I160, Letter 1357296



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I60-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I60-2 Extend the comment period an additional 90 days
- I60-3 Implement the plan in 10-year increments under separate ROD amendments
- I60-4 Provide numerous opportunities for meaningful public input
- I60-5 Focus on storm water runoff prevention to protect property already cleaned up
- I60-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I60-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I60-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: Provide local EPA office

I60-9 _____

_____

You must sign to make this a valid comment! Sincerely, B Roy

Response to comment I160-1
See response to Comment No. I25-1.

Response to comment I160-2
See response to Comment No. I25-2.

Response to comment I160-3
See response to Comment No. I25-3.

Response to comment I160-4
See response to Comment No. I25-4.

Response to comment I160-5
See response to Comment No. I25-5.

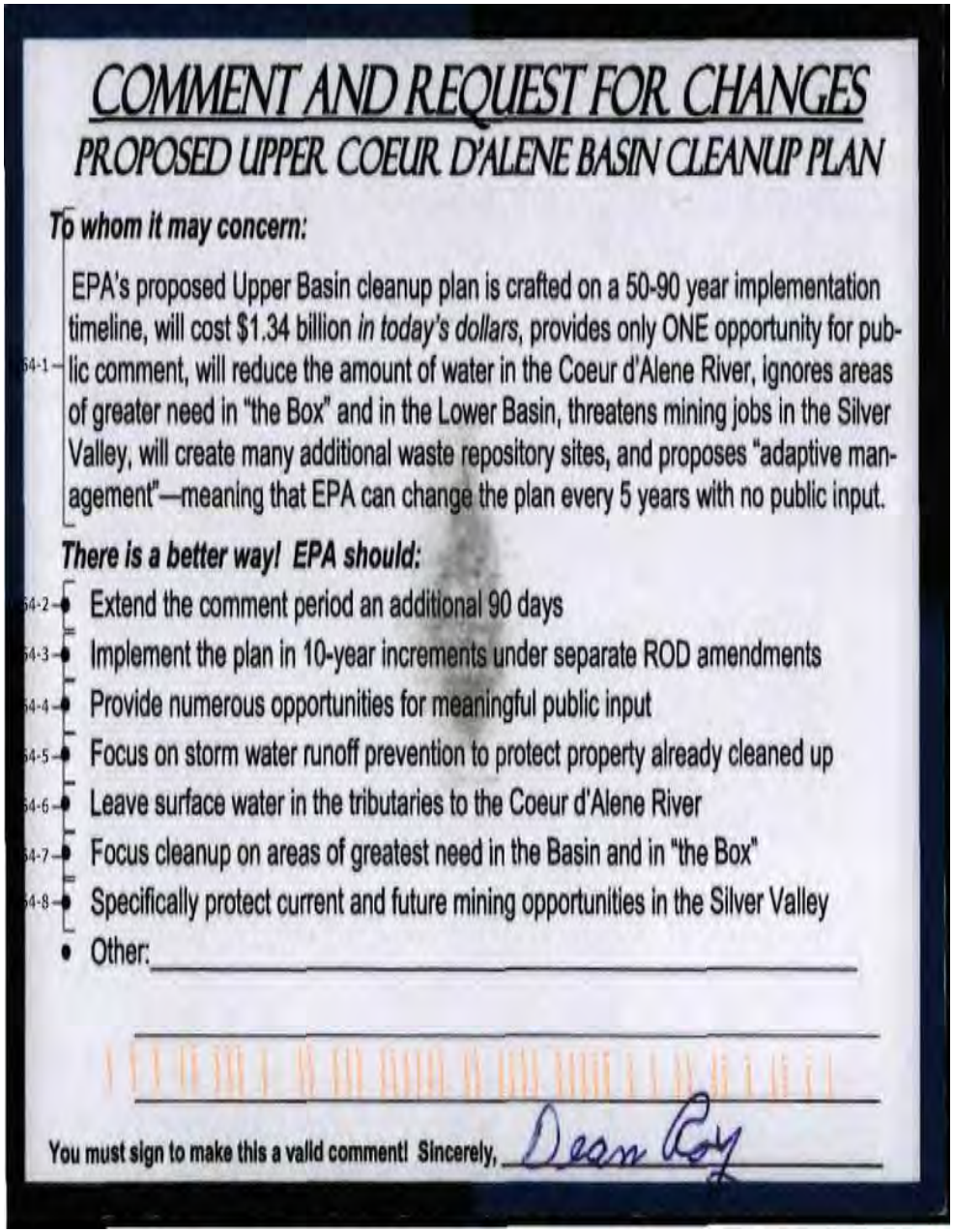
Response to comment I160-6
See response to Comment No. I25-6.

Response to comment I160-7
See response to Comment No. I25-7.

Response to comment I160-8
See response to Comment No. I25-8.

Response to comment I160-9
EPA agrees that it is helpful to have a community liaison available in the local area. In March 2011, EPA hired (through the "SEE" program) a local resident to serve this role. That individual later accepted a different position, resigning in 2012. The agency has recently been looking into options for re-establishing the position and is now moving forward with filling this position with someone from the local community. In addition, several local resources are available. EPA maintains a field office in Coeur d'Alene, staffed with a key local contact for the cleanup. The office of the Coeur d'Alene Trust, heavily involved in cleanup work, is located in Kellogg. Also, the State Department of Environmental Quality has an office in Kellogg, staffed with people working on the cleanup. EPA encourages citizens to contact cleanup staff any time with questions or concerns.

Roy, Dean, I164, Letter 1357300



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I64-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I64-2 Extend the comment period an additional 90 days
- I64-3 Implement the plan in 10-year increments under separate ROD amendments
- I64-4 Provide numerous opportunities for meaningful public input
- I64-5 Focus on storm water runoff prevention to protect property already cleaned up
- I64-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I64-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I64-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Dean Roy

Response to comment I164-1
See response to Comment No. I25-1.

Response to comment I164-2
See response to Comment No. I25-2.

Response to comment I164-3
See response to Comment No. I25-3.

Response to comment I164-4
See response to Comment No. I25-4.

Response to comment I164-5
See response to Comment No. I25-5.

Response to comment I164-6
See response to Comment No. I25-6.

Response to comment I164-7
See response to Comment No. I25-7.

Response to comment I164-8
See response to Comment No. I25-8.

Roy, Elizabeth, I747, Letter 618745

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
babs0506@yahoo.com to: formsubmission 11/17/2010 12:46 PM
Sent by: Babs0506@Yahoo.Com <babs0506=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Elizabeth Roy
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I747-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: babs0506@yahoo.com
Mailing Address: PO Box 453|Silverton|ID|83867-0450|US
Phone Number: (208) 752-6901

618745

Response to comment I747-1

See response to Comment No. I351-1.

Rubino, Richard, I748, Letter 618746

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
richard.rubino66@gmail.com to: formsubmission 11/18/2010 05:34 AM
Sent by: Richard.Rubino66@Gmail.Com <richard.rubino66=gmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Richard Rubino
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: richard.rubino66@gmail.com
Mailing Address: Richard Rubino, 37 Wettleson Avenue|West Hartford|Connecticut|06107|US
Phone Number: (860) 550-5724

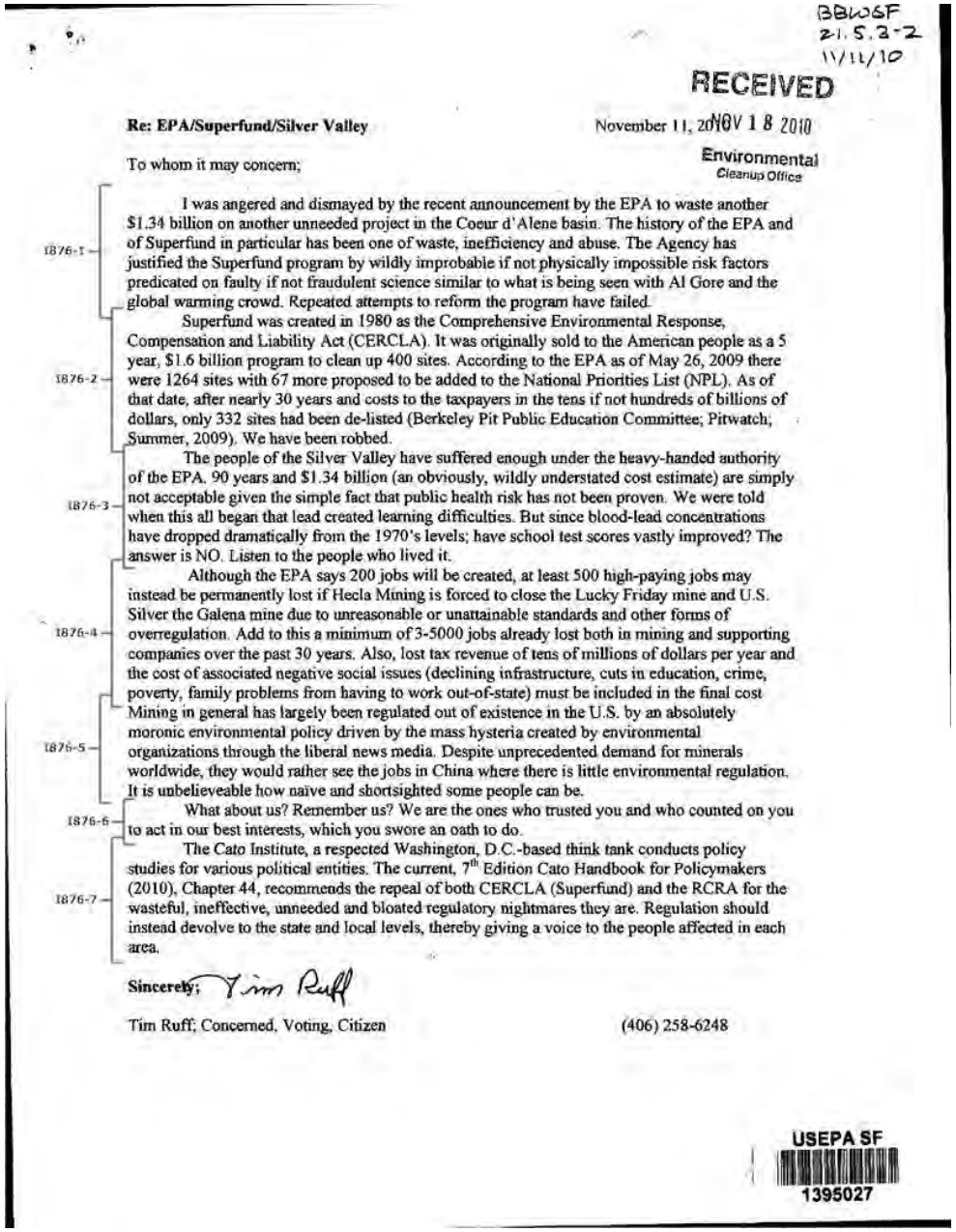
I748-1

618746

Response to comment I748-1

See response to Comment No. I351-1.

Ruff, Tim, I876, Letter 1395027



BBWSF
21.5.3-2
11/11/10

RECEIVED
NOV 18 2010
Environmental
Cleanup Office

Re: EPA/Superfund/Silver Valley November 11, 2010

To whom it may concern;

I876-1 I was angered and dismayed by the recent announcement by the EPA to waste another $1.34 billion on another unneeded project in the Coeur d'Alene basin. The history of the EPA and of Superfund in particular has been one of waste, inefficiency and abuse. The Agency has justified the Superfund program by wildly improbable if not physically impossible risk factors predicated on faulty if not fraudulent science similar to what is being seen with Al Gore and the global warming crowd. Repeated attempts to reform the program have failed.

I876-2 Superfund was created in 1980 as the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). It was originally sold to the American people as a 5 year, $1.6 billion program to clean up 400 sites. According to the EPA as of May 26, 2009 there were 1264 sites with 67 more proposed to be added to the National Priorities List (NPL). As of that date, after nearly 30 years and costs to the taxpayers in the tens if not hundreds of billions of dollars, only 332 sites had been de-listed (Berkeley Pit Public Education Committee; Pitwatch; Summer, 2009). We have been robbed.

I876-3 The people of the Silver Valley have suffered enough under the heavy-handed authority of the EPA. 90 years and $1.34 billion (an obviously, wildly understated cost estimate) are simply not acceptable given the simple fact that public health risk has not been proven. We were told when this all began that lead created learning difficulties. But since blood-lead concentrations have dropped dramatically from the 1970's levels; have school test scores vastly improved? The answer is NO. Listen to the people who lived it.

I876-4 Although the EPA says 200 jobs will be created, at least 500 high-paying jobs may instead be permanently lost if Hecla Mining is forced to close the Lucky Friday mine and U.S. Silver the Galena mine due to unreasonable or unattainable standards and other forms of overregulation. Add to this a minimum of 3-5000 jobs already lost both in mining and supporting companies over the past 30 years. Also, lost tax revenue of tens of millions of dollars per year and the cost of associated negative social issues (declining infrastructure, cuts in education, crime, poverty, family problems from having to work out-of-state) must be included in the final cost Mining in general has largely been regulated out of existence in the U.S. by an absolutely moronic environmental policy driven by the mass hysteria created by environmental organizations through the liberal news media. Despite unprecedented demand for minerals worldwide, they would rather see the jobs in China where there is little environmental regulation. It is unbelieveable how naïve and shortsighted some people can be.

I876-5

I876-6 What about us? Remember us? We are the ones who trusted you and who counted on you to act in our best interests, which you swore an oath to do.

I876-7 The Cato Institute, a respected Washington, D.C.-based think tank conducts policy studies for various political entities. The current, 7th Edition Cato Handbook for Policymakers (2010), Chapter 44, recommends the repeal of both CERCLA (Superfund) and the RCRA for the wasteful, ineffective, unneeded and bloated regulatory nightmares they are. Regulation should instead devolve to the state and local levels, thereby giving a voice to the people affected in each area.

Sincerely; Tim Ruff

Tim Ruff; Concerned, Voting, Citizen (406) 258-6248

USEPA SF
1395027

Response to comment I876-1
Comment noted.

Response to comment I876-2
Comment noted.

Response to comment I876-3
Regarding the duration and cost of the Selected Remedy, see responses to Comment Nos. I58-1 and I58-2. As to human health risks, see response to Comment I295-1.

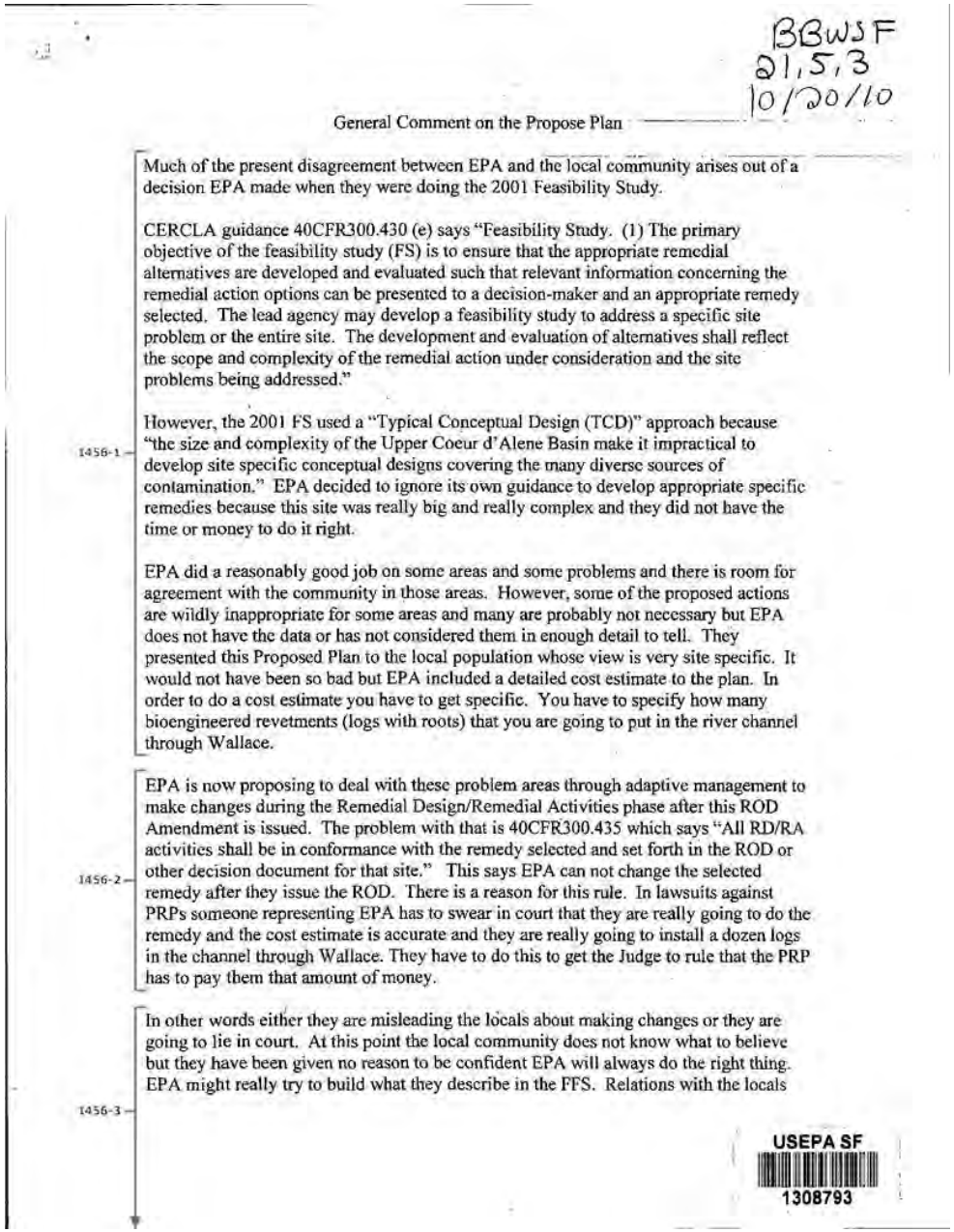
Response to comment I876-4
See response to Comment No. I58-5.

Response to comment I876-5
Comment noted.

Response to comment I876-6
Comment noted.

Response to comment I876-7
Comment noted.

Rust, W.C., I456, Letter 1308793



BBWSF
21,5,3
10/20/10

General Comment on the Propose Plan

Much of the present disagreement between EPA and the local community arises out of a decision EPA made when they were doing the 2001 Feasibility Study.

CERCLA guidance 40CFR300.430 (e) says "Feasibility Study. (1) The primary objective of the feasibility study (FS) is to ensure that the appropriate remedial alternatives are developed and evaluated such that relevant information concerning the remedial action options can be presented to a decision-maker and an appropriate remedy selected. The lead agency may develop a feasibility study to address a specific site problem or the entire site. The development and evaluation of alternatives shall reflect the scope and complexity of the remedial action under consideration and the site problems being addressed."

I456-1 However, the 2001 FS used a "Typical Conceptual Design (TCD)" approach because "the size and complexity of the Upper Coeur d'Alene Basin make it impractical to develop site specific conceptual designs covering the many diverse sources of contamination." EPA decided to ignore its own guidance to develop appropriate specific remedies because this site was really big and really complex and they did not have the time or money to do it right.

EPA did a reasonably good job on some areas and some problems and there is room for agreement with the community in those areas. However, some of the proposed actions are wildly inappropriate for some areas and many are probably not necessary but EPA does not have the data or has not considered them in enough detail to tell. They presented this Proposed Plan to the local population whose view is very site specific. It would not have been so bad but EPA included a detailed cost estimate to the plan. In order to do a cost estimate you have to get specific. You have to specify how many bioengineered revetments (logs with roots) that you are going to put in the river channel through Wallace.

I456-2 EPA is now proposing to deal with these problem areas through adaptive management to make changes during the Remedial Design/Remedial Activities phase after this ROD Amendment is issued. The problem with that is 40CFR300.435 which says "All RD/RA activities shall be in conformance with the remedy selected and set forth in the ROD or other decision document for that site." This says EPA can not change the selected remedy after they issue the ROD. There is a reason for this rule. In lawsuits against PRPs someone representing EPA has to swear in court that they are really going to do the remedy and the cost estimate is accurate and they are really going to install a dozen logs in the channel through Wallace. They have to do this to get the Judge to rule that the PRP has to pay them that amount of money.

I456-3 In other words either they are misleading the locals about making changes or they are going to lie in court. At this point the local community does not know what to believe but they have been given no reason to be confident EPA will always do the right thing. EPA might really try to build what they describe in the FFS. Relations with the locals

USEPA SF
1308793

Response to comment I456-1

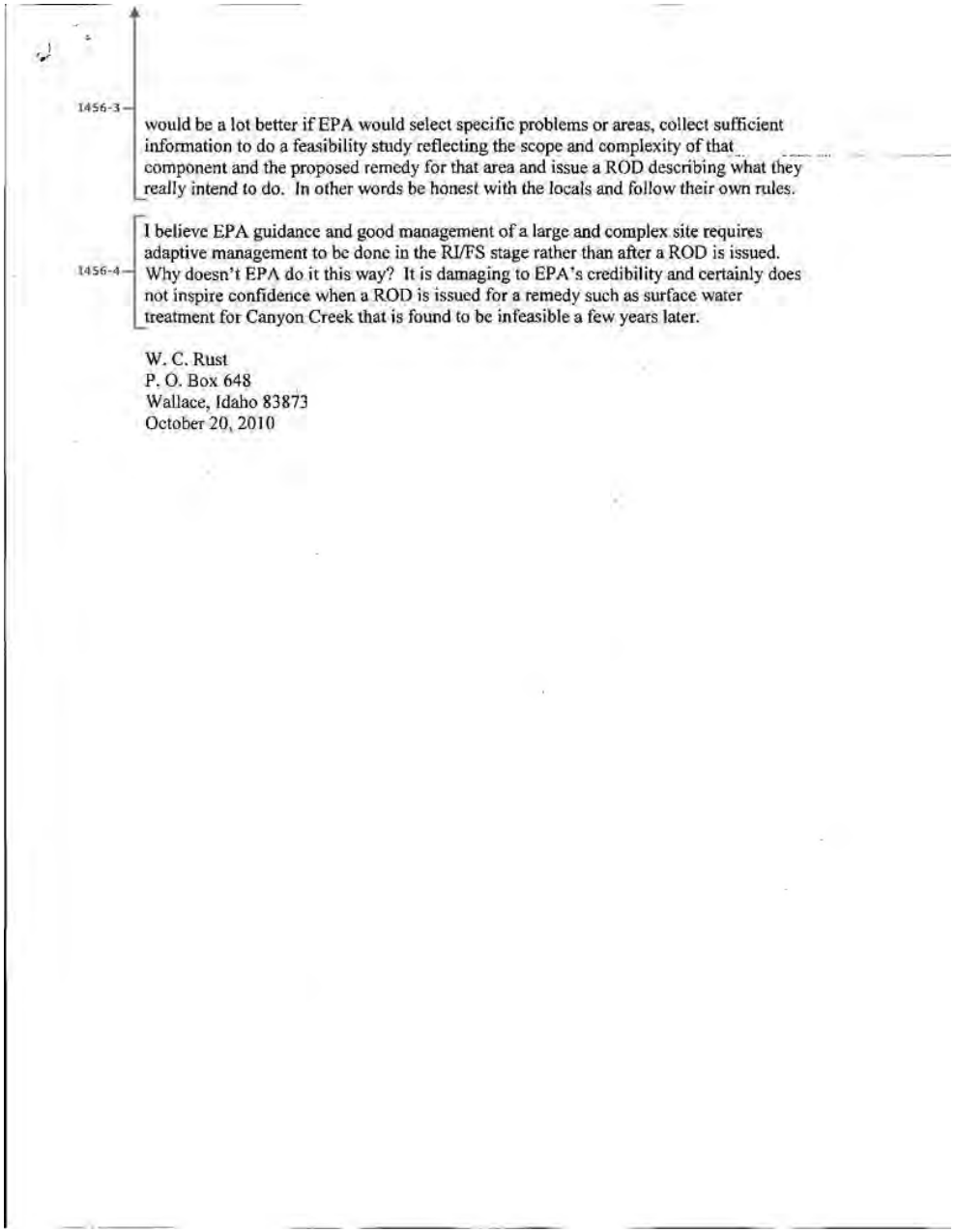
Thank you for your comment. The FFS, Proposed Plan and ROD Amendment, including the Selected Remedy, were developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. In response to comments received, many from local residents and business owners, EPA has reduced the scope of the Selected Remedy. See response to Comment No. I58-1.

Response to comment I456-2

See response to Comment No. LJ11-2 on adaptive management. Regarding potential changes to remedies during implementation, see the ROD Amendment, Part 2, Section 12.3.

Response to comment I456-3

See responses to Comment Nos. I58-1 and I295-2. EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In those instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments.



1456-3 would be a lot better if EPA would select specific problems or areas, collect sufficient information to do a feasibility study reflecting the scope and complexity of that component and the proposed remedy for that area and issue a ROD describing what they really intend to do. In other words be honest with the locals and follow their own rules.

1456-4 I believe EPA guidance and good management of a large and complex site requires adaptive management to be done in the RI/FS stage rather than after a ROD is issued. Why doesn't EPA do it this way? It is damaging to EPA's credibility and certainly does not inspire confidence when a ROD is issued for a remedy such as surface water treatment for Canyon Creek that is found to be infeasible a few years later.

W. C. Rust
P. O. Box 648
Wallace, Idaho 83873
October 20, 2010

Response to comment I456-4

The FFS, Proposed Plan and ROD Amendment, including the Selected Remedy, were developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. The 2002 ROD required additional evaluation of the selected approach for treatment of water in Canyon Creek. As a result of this evaluation and input from the PFT, EPA changed the approach in the Selected Remedy for treatment of water in Canyon Creek. Regarding EPA's use of adaptive management in implementing the Selected Remedy, see ROD Amendment, Part 2, Section 12.3 and Part 3, Section 3.11.1.

Ruth Dilling, Mary, I277, Letter 616015-41

surveyor, taxpayer and an affected citizen of the Silver Valley. It's an honor to go behind that young lady who's within the health care profession. This is a nice follow up to that. The driving force behind Superfund cleanup costs is quite basically an [absurd] assumption. By assuming extremely unlikely and sometimes physically impossible events will occur at some point in the future, EPA is able to create the impression of risk where no actual harm will occur. EPA generally, based upon these wildly exaggerated risks, given the increased cancer risk of one in 10,000 will undertake enormous cleanup costs. When you consider the normal rate of total cancer occurrence in the US, which is approximately one in four, expending $1.34 billion to reduce the cancer risk by less than 1/100 of 1%is absolutely absurd, nothing short of irresponsible. I am offended as a member of the scientific community this is could ever be mistaken science.

Mary Ruth Dilling:

I277-1

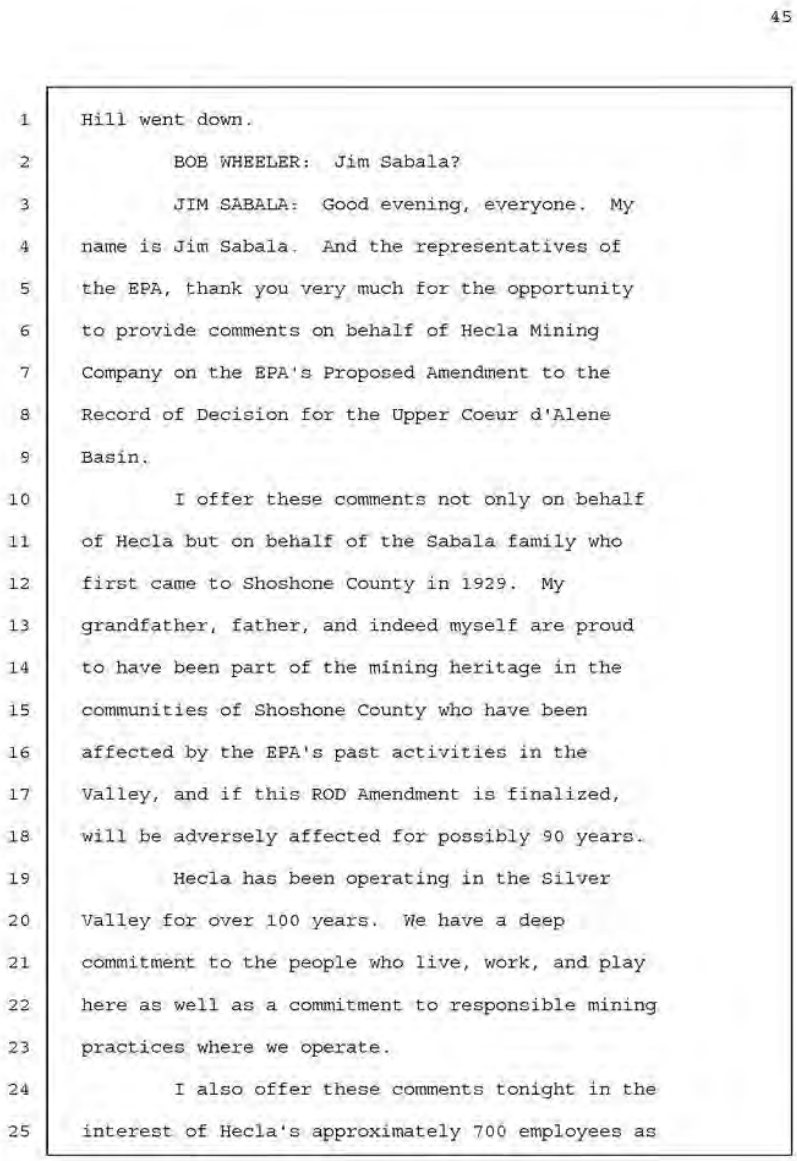
My name is Mary Ruth Dilling. I feel the EPA continues to stick its nose in our business and it's time for the federal government to leave our area and go home. After the legal issues were handled in the past, the federal court said there had to be an ending if this plan is approved. Where is the ending? I know Wednesday night I saw the minutes from the Coeur d'Alene Basin board meeting and they were talking about in ten years working on the Coeur d'Alene River. Where does it stop? Another point as I was speaking to one of the project managers at the open house, he was explaining that they were draining the ground water. Okay, I know an old tried and true method of cleaning water is to drain it through sand and rocks. So if they're not going to worry about the surface water but the ground water, is the testing done on the ground water? The other night it was talking about work to be redone. Why? Because Mother Nature has torn away what EPA has done. Look at all this snow and snowmelt. Mother Nature is not going to be stopped. Does this mean that we continually put money into a project that has to be done over and over? I know of one EPA worker talking to another former one and said they needed to keep up the lead testing to keep the money coming in, but the results were all in the normal range and they had a problem with that. Listen, the EPA has already done enough damage. It's time for them to return home. Let's take care of ourselves.

Citrix — Lower Cost, More Convenient Communications
Page 34 of 45

Response to comment I277-1

See responses to Comment Nos. I58-1, I54-5, and I295-1.

Sabala, Jim, I213, Letter 610097-8



45

Hill went down.

BOB WHEELER: Jim Sabala?

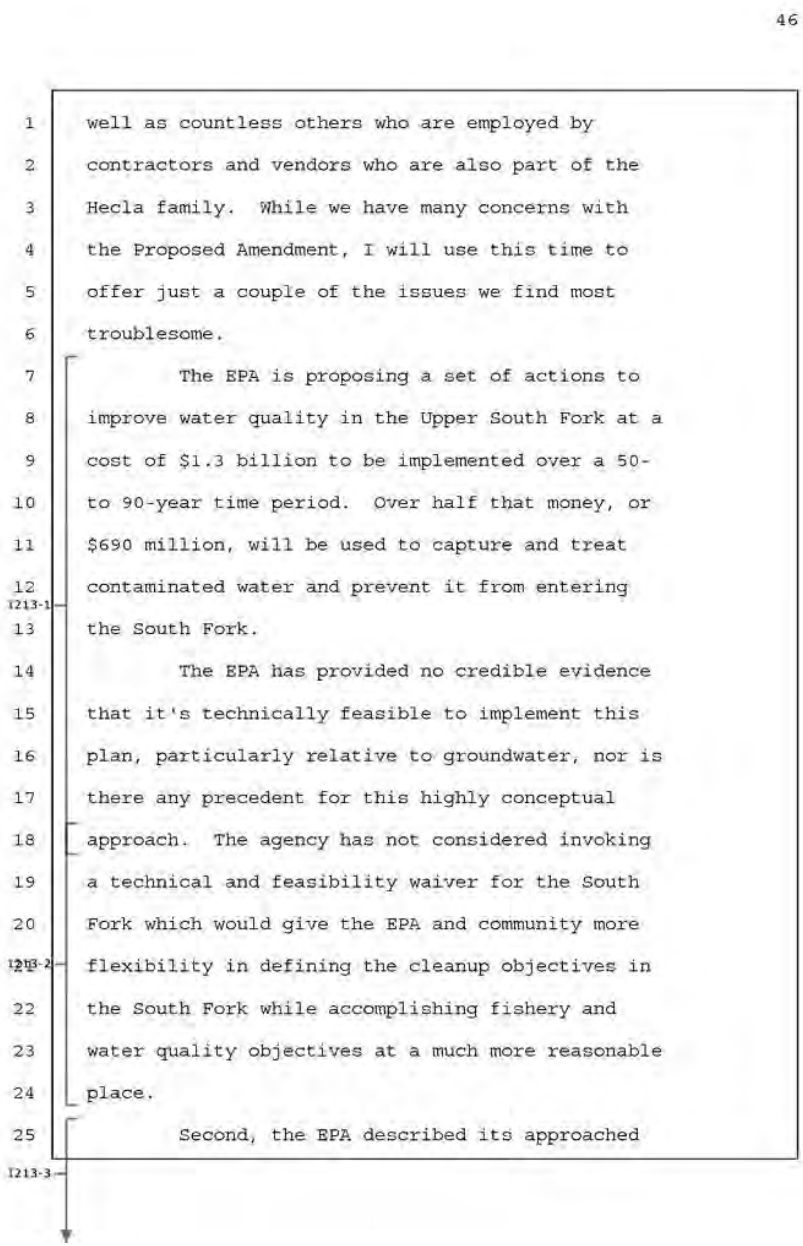
JIM SABALA: Good evening, everyone. My name is Jim Sabala. And the representatives of the EPA, thank you very much for the opportunity to provide comments on behalf of Hecla Mining Company on the EPA's Proposed Amendment to the Record of Decision for the Upper Coeur d'Alene Basin.

I offer these comments not only on behalf of Hecla but on behalf of the Sabala family who first came to Shoshone County in 1929. My grandfather, father, and indeed myself are proud to have been part of the mining heritage in the communities of Shoshone County who have been affected by the EPA's past activities in the Valley, and if this ROD Amendment is finalized, will be adversely affected for possibly 90 years.

Hecla has been operating in the Silver Valley for over 100 years. We have a deep commitment to the people who live, work, and play here as well as a commitment to responsible mining practices where we operate.

I also offer these comments tonight in the interest of Hecla's approximately 700 employees as

No comments



46

well as countless others who are employed by contractors and vendors who are also part of the Hecla family. While we have many concerns with the Proposed Amendment, I will use this time to offer just a couple of the issues we find most troublesome.

The EPA is proposing a set of actions to improve water quality in the Upper South Fork at a cost of $1.3 billion to be implemented over a 50- to 90-year time period. Over half that money, or $690 million, will be used to capture and treat contaminated water and prevent it from entering the South Fork. I213-1

The EPA has provided no credible evidence that it's technically feasible to implement this plan, particularly relative to groundwater, nor is there any precedent for this highly conceptual approach. The agency has not considered invoking a technical and feasibility waiver for the South Fork which would give the EPA and community more flexibility in defining the cleanup objectives in the South Fork while accomplishing fishery and water quality objectives at a much more reasonable place. I213-2

Second, the EPA described its approached I213-3

Response to comment I213-1

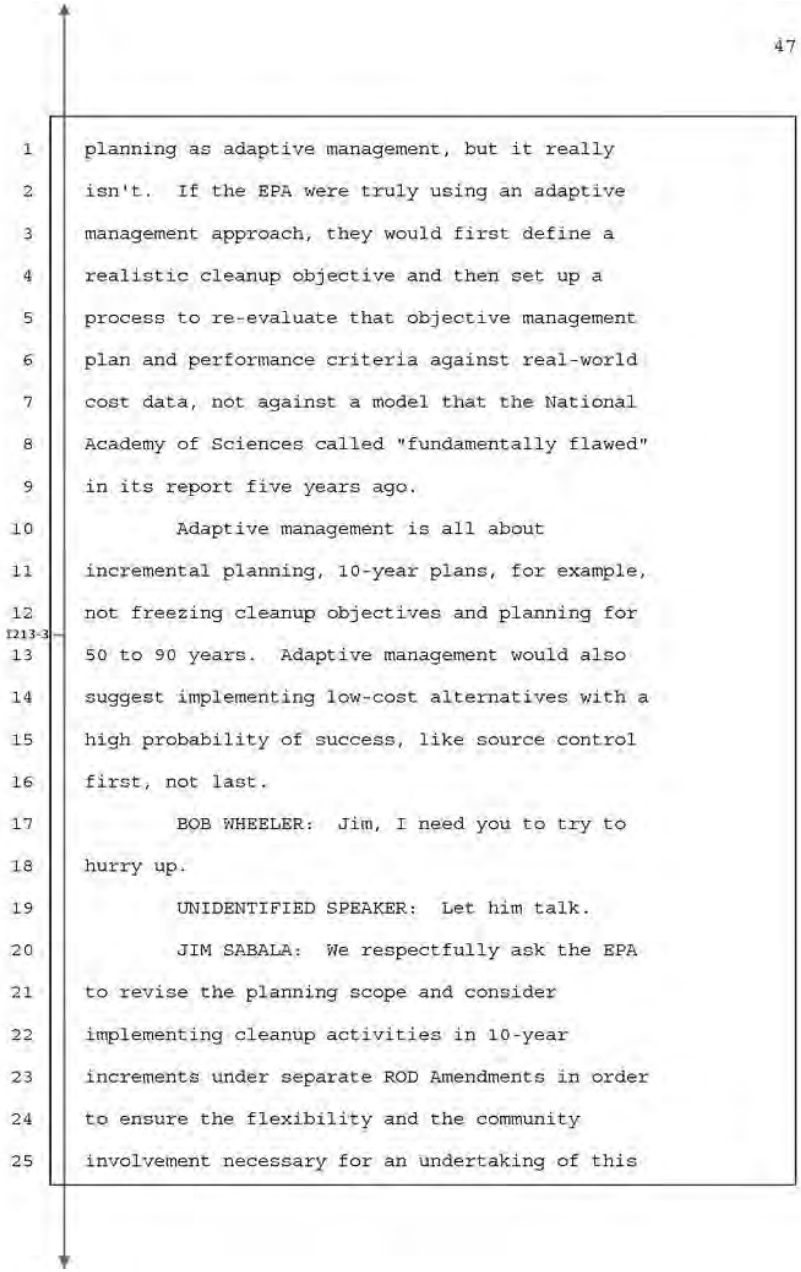
See response to Comment No. I828-10.

Response to comment I213-2

See response to Comment No. SA4-11.

Response to comment I213-3

EPA is committed to using an adaptive management framework to manage and carry out the Selected Remedy for the Upper Basin, in accordance with its previous decision documents and the recommendations of the NAS (National Academy of Sciences, 2005, http://www.epa.gov/superfund/accomp/coeur/). See responses to Comment Nos. I58-4 and LJ11-2 regarding EPA's proposed adaptive management approach.



47

planning as adaptive management, but it really isn't. If the EPA were truly using an adaptive management approach, they would first define a realistic cleanup objective and then set up a process to re-evaluate that objective management plan and performance criteria against real-world cost data, not against a model that the National Academy of Sciences called "fundamentally flawed" in its report five years ago.

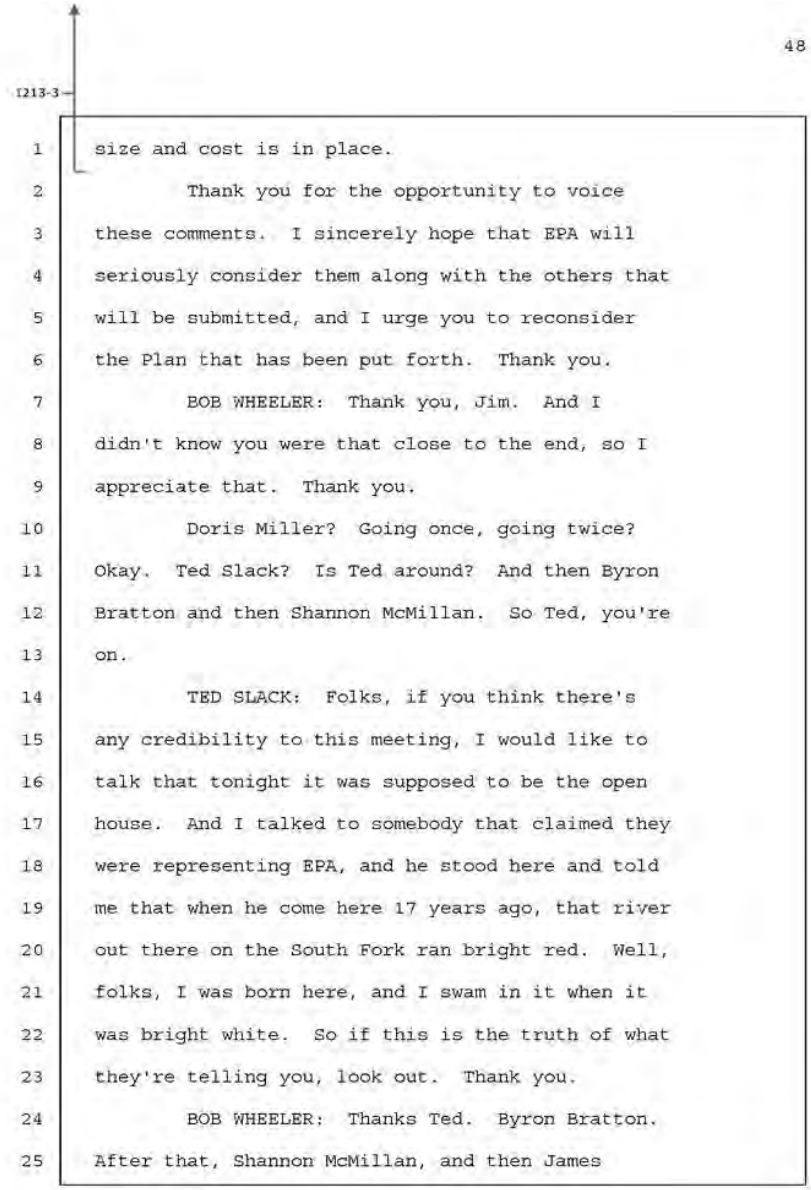
Adaptive management is all about incremental planning, 10-year plans, for example, not freezing cleanup objectives and planning for I213-3 50 to 90 years. Adaptive management would also suggest implementing low-cost alternatives with a high probability of success, like source control first, not last.

BOB WHEELER: Jim, I need you to try to hurry up.

UNIDENTIFIED SPEAKER: Let him talk.

JIM SABALA: We respectfully ask the EPA to revise the planning scope and consider implementing cleanup activities in 10-year increments under separate ROD Amendments in order to ensure the flexibility and the community involvement necessary for an undertaking of this

No comments



48

I213-3

size and cost is in place.

Thank you for the opportunity to voice these comments. I sincerely hope that EPA will seriously consider them along with the others that will be submitted, and I urge you to reconsider the Plan that has been put forth. Thank you.

BOB WHEELER: Thank you, Jim. And I didn't know you were that close to the end, so I appreciate that. Thank you.

Doris Miller? Going once, going twice? Okay. Ted Slack? Is Ted around? And then Byron Bratton and then Shannon McMillan. So Ted, you're on.

TED SLACK: Folks, if you think there's any credibility to this meeting, I would like to talk that tonight it was supposed to be the open house. And I talked to somebody that claimed they were representing EPA, and he stood here and told me that when he come here 17 years ago, that river out there on the South Fork ran bright red. Well, folks, I was born here, and I swam in it when it was bright white. So if this is the truth of what they're telling you, look out. Thank you.

BOB WHEELER: Thanks Ted. Byron Bratton. After that, Shannon McMillan, and then James

No comments

Sabey, Leonard, I17, Letter 896741

CDA PLAN
Leonarda Sabey
to:
CDABasin
07/23/2010 02:14 PM
Show Details

I17-1 This new plan is insane. It is time for the EPA to go make someone else go broke. We can clean up after ourselves. History in this valley has always been that when a new safer cleaner way to mine came along we all jumped on it. We don't need the EPA this idea is so insane it would be funny if anyone else came up with it. No you can not pipe our water. No you can not kill our fishing and NO YOU CAN NOT KILL OUR MINING. We are done standing back and laughing at your {EPA} stupid ideas now we are standing up and saying you are done here. GO SOMEWHERE ELSE.
Leonarda Sabey

I've sent this as well as other letters on this subject to our Governor and Congressmen.

896741

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web1602.h... 8/10/2010

Response to comment I17-1

Comment noted. Regarding continued mining in the Silver Valley, see response to Comment No. I58-5.

Sala, Paul, I18, Letter 896742

comment letter
Cold August
to:
CDABasin
08/11/2010 10:35 AM
Show Details

To EPA,

Concerning the 90 year proposal for the CDA Basin Clean-up Project:

I18-1 — *I feel that the single opportunity for public comment in open forum concerning the proposed clean-up project is was a disgrace. You only allowed 90 minutes of comments from the people who have to endure this process for a project you say will take up to 47,304,000 minutes to complete. I feel the comment period should be extended for a time period of 45 days to allow all those who desire, ample time to gather their information and present it in open forum.*

I18-2 — *As for the proposed clean-up time frame; 50 to 90 years seems very un-realistic to me. I can't imagine the clean-up process taking that amount of time. I have to agree with the common consensus in the county and ask that the proposed clean-up be made in 10 year increments that require re-approval for each 10 year segment.*

I18-3 — *I recreate in and along the Coeur d'Alene River on a daily basis and I don't want to see it taken away from the people of this Great State of Idaho. The River has been in a healing process itself for many years, and it hasn't looked cleaner during my life-long residence. I don't want to imagine what it and the lower basin will look like once you start digging on the river banks. Coeur d'Alene Lake will look like what river did 40 years ago, then what; remediate it lake bed, and after that the Spokane River and then Columbia? Where does it stop? It seems like the EPA is working on a retirement project for their employees, not a sensible clean-up project.*

Please consider this as my official statement as I was unable to attend the public comment meeting.

Paul Sala
Cataldo, Idaho

896742

Response to comment I18-1

See responses to Comment Nos. I295-2 and I54-6.

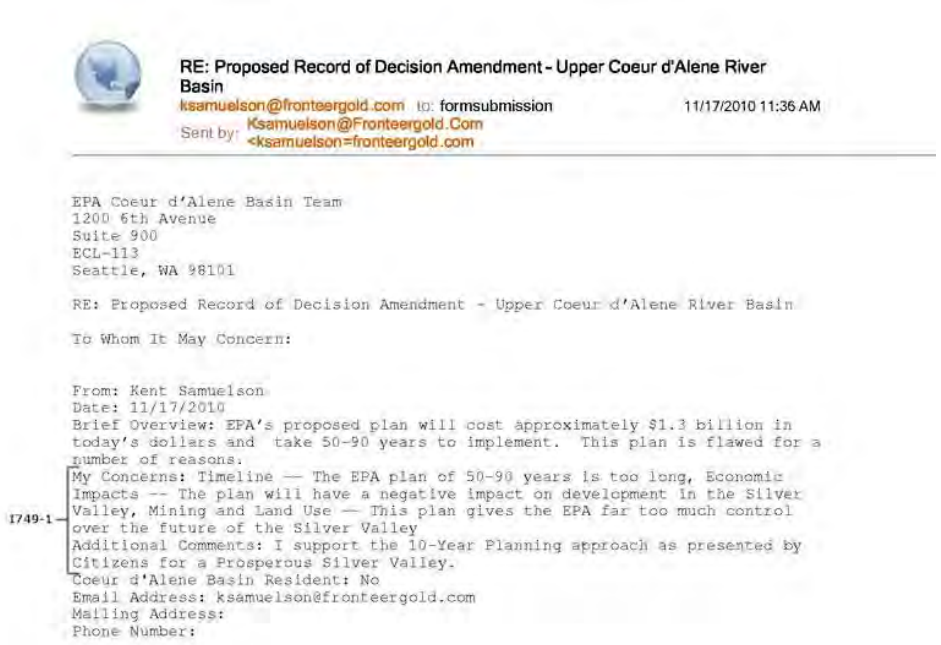
Response to comment I18-2

See responses to Comment Nos. I58-1 and I58-4.

Response to comment I18-3

See response to Comment No. I58-1 regarding the reduced scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan. The Proposed Plan presents EPA's preferred approach for cleanup of historic mining-related contamination in the Upper Basin of the Coeur d'Alene River. EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediment, groundwater, and surface water that poses risks to people, wildlife, and the environment. The levels of contamination significantly exceed acceptable state and site-specific water quality standards. EPA believes that the cleanup will benefit the local economy in a variety of ways. The Selected Remedy will boost economic growth by ensuring a safe environment for residents and tourists, creating jobs with the money that will be spent on the Upper Basin cleanup, and providing opportunities for currently contaminated land to be redeveloped.

Samuelson, Kent, I749, Letter 618747



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
ksamuelson@fronteergold.com to: formsubmission 11/17/2010 11:36 AM
Sent by: Ksamuelson@Fronteergold.Com <ksamuelson=fronteergold.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Kent Samuelson
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: ksamuelson@fronteergold.com
Mailing Address:
Phone Number:

I749-1

618747

Response to comment I749-1

See response to Comment No. I351-1.

Sanborn, Chase, I422, Letter 616325

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
chase_sanborn@hotmail.com to: formsubmission 11/13/2010 07:41 AM
Sent by: Chase_sanborn@Hotmail.Com <chase_sanborn=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Chase Sanborn
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 milllion will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
I believe it's time to start working together with the people of the valley. I have been a member of the Wallace City Council for over 12 years, in that time the EPA has made maybe two presentations to us. The EPA has never come to the city and asked us what we thought would be best for our citizens.
Please take the course of the ten year plan.
Coeur d'Alene Basin Resident: Yes
Email Address: chase_sanborn@hotmail.com
Mailing Address: 153 King Street|Wallace|Idaho|83873|US
Phone Number: (208) 660-3430

I422-1
I422-2

616325

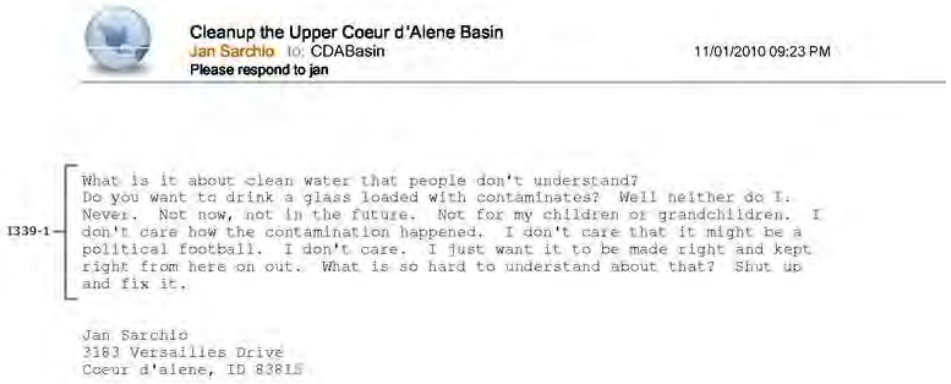
Response to comment I422-1

See response to Comment No. I351-1.

Response to comment I422-2

See responses to Comment Nos. I295-2 and I474-2.

Sarchio, I339, Letter 614469



Cleanup the Upper Coeur d'Alene Basin
Jan Sarchio to: CDABasin 11/01/2010 09:23 PM
Please respond to jan

I339-1 What is it about clean water that people don't understand?
Do you want to drink a glass loaded with contaminates? Well neither do I.
Never. Not now, not in the future. Not for my children or grandchildren. I
don't care how the contamination happened. I don't care that it might be a
political football. I don't care. I just want it to be made right and kept
right from here on out. What is so hard to understand about that? Shut up
and fix it.

Jan Sarchio
3183 Versailles Drive
Coeur d'alene, ID 83815

614469

Response to comment I339-1

See response to Comment No. I295-1.

Scanlon, Sandra, I750, Letter 618748

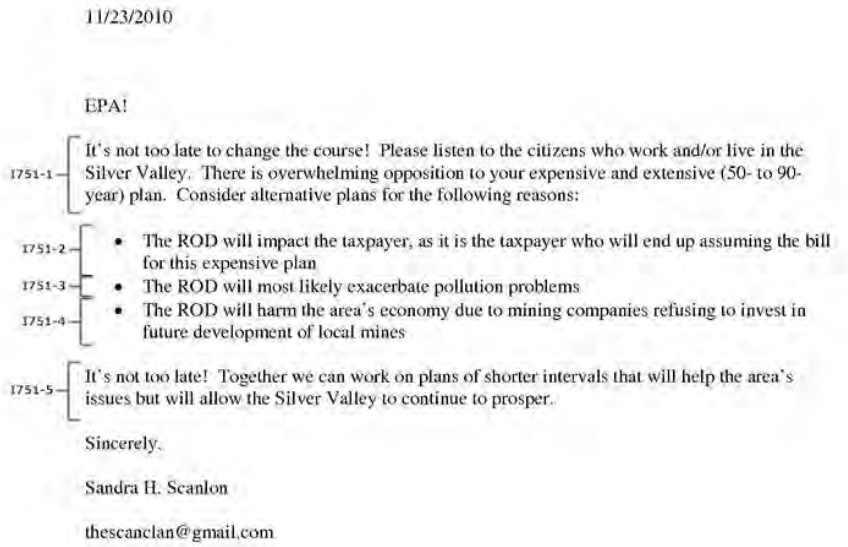
I750-1 No on the ROD, yes on the 10 yr plan!
The Scan Clan
to:
CDABasin
11/23/2010 04:34 PM
Show Details

618748

Response to comment I750-1

See response to Comment No. I474-2.

Scanlon, Sandra, I751, Letter 618749



11/23/2010

EPA!

I751-1 It's not too late to change the course! Please listen to the citizens who work and/or live in the Silver Valley. There is overwhelming opposition to your expensive and extensive (50- to 90-year) plan. Consider alternative plans for the following reasons:

I751-2 • The ROD will impact the taxpayer, as it is the taxpayer who will end up assuming the bill for this expensive plan

I751-3 • The ROD will most likely exacerbate pollution problems

I751-4 • The ROD will harm the area's economy due to mining companies refusing to invest in future development of local mines

I751-5 It's not too late! Together we can work on plans of shorter intervals that will help the area's issues but will allow the Silver Valley to continue to prosper.

Sincerely,

Sandra H. Scanlon

thescanclan@gmail.com

618749

Response to comment I751-1

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I751-2

See response to Comment No. I295-3.

Response to comment I751-3

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediment, groundwater, and surface water that poses risks to people, wildlife, and the environment. The levels of contamination significantly exceed acceptable state and site-specific water quality standards. Contaminants include lead, zinc, cadmium, arsenic, and other metals. See response to Comment No. I58-1 regarding the reduced scope of the Selected Remedy compared to the Preferred Alternative identified in the Proposed Plan.

Response to comment I751-4

See response to Comment No. I58-5.

Response to comment I751-5

Thank you for your comment.

Scholz, Kurt, I423, Letter 616326

Silver Valley Clean-up
Kurt Scholz
to:
CDABasin
11/16/2010 10:43 AM
Show Details

I423-1 This is a Letter of very serious content. How many of you can remember back in your school days? ? One thing that really sticks out in my mind is "THE FACT" that according to physics instructors it is a very well known FACT,, "You cannot clean anything from the bottom up!" Period The End!!! If You Want it CLEAN, you MUST Start at The TOP, and work your way to the bottom, anything less is a complete Waste Of Time!!! How about another FACT that is really alarming. They are putting the "BAD DIRT" in a repository which is in the flood plain at Cataldo! As for their request to extend their I423-2
I423-3 clean up time to 90 yrs. is a Flat Out Statement, by them, that even they know the job is impossible to complete, due to the FACT that the Silver Valley in it's entirety is a very high concentration of metals, it is part of everything and cannot be separated, Period The End!!! Now they THINK they can clean up C'da Lake. What Kind of Drugs is The E.P.A. on????? They would make things Worse than what they really are!!! After that I guess they figure they are going to have to clean up all the way to Spokane, to clean up what they messed up by trying to clean up the Lake. Get The E.P.A. OUT of The Silver Valley. It would also help control Government Spending, or should I say "WASTE" I423-4

616326

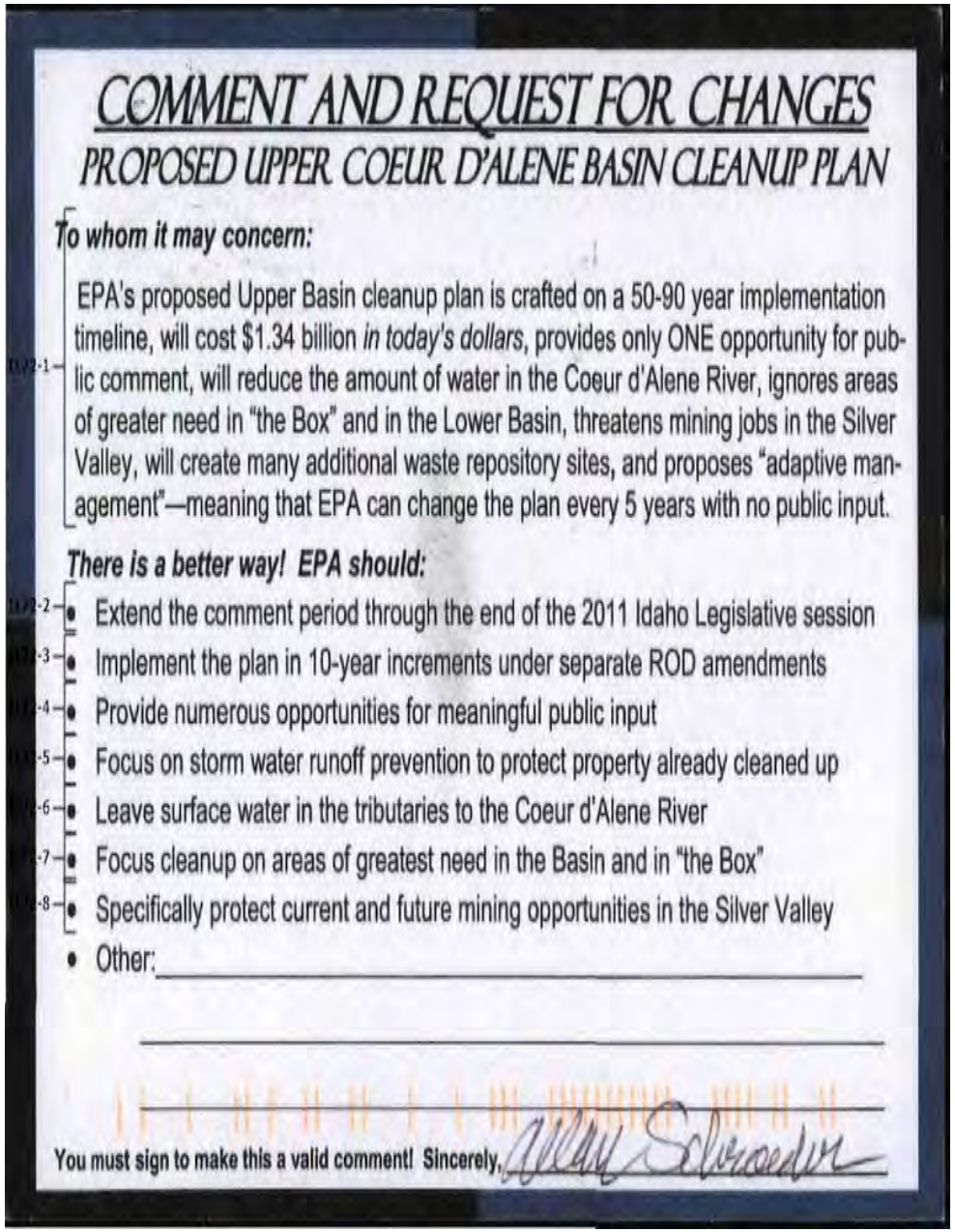
Response to comment I423-1
Comment noted.

Response to comment I423-2
See response to Comment No. LC21-9.

Response to comment I423-3
See response to Comment No. I58-1 regarding the duration of the Selected Remedy. See response to Comment No. LC33-8 regarding background metals concentrations in the Coeur d'Alene Basin.

Response to comment I423-4
Comment noted.

Schroeder, Allan, I172, Letter 1357365



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I172-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I172-2 • Extend the comment period through the end of the 2011 Idaho Legislative session

I172-3 • Implement the plan in 10-year increments under separate ROD amendments

I172-4 • Provide numerous opportunities for meaningful public input

I172-5 • Focus on storm water runoff prevention to protect property already cleaned up

I172-6 • Leave surface water in the tributaries to the Coeur d'Alene River

I172-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"

I172-8 • Specifically protect current and future mining opportunities in the Silver Valley

• Other:_____

You must sign to make this a valid comment! Sincerely, Allan Schroeder

Response to comment I172-1
See response to Comment No. I25-1.

Response to comment I172-2
See response to Comment No. I25-2.

Response to comment I172-3
See response to Comment No. I25-3.

Response to comment I172-4
See response to Comment No. I25-4.

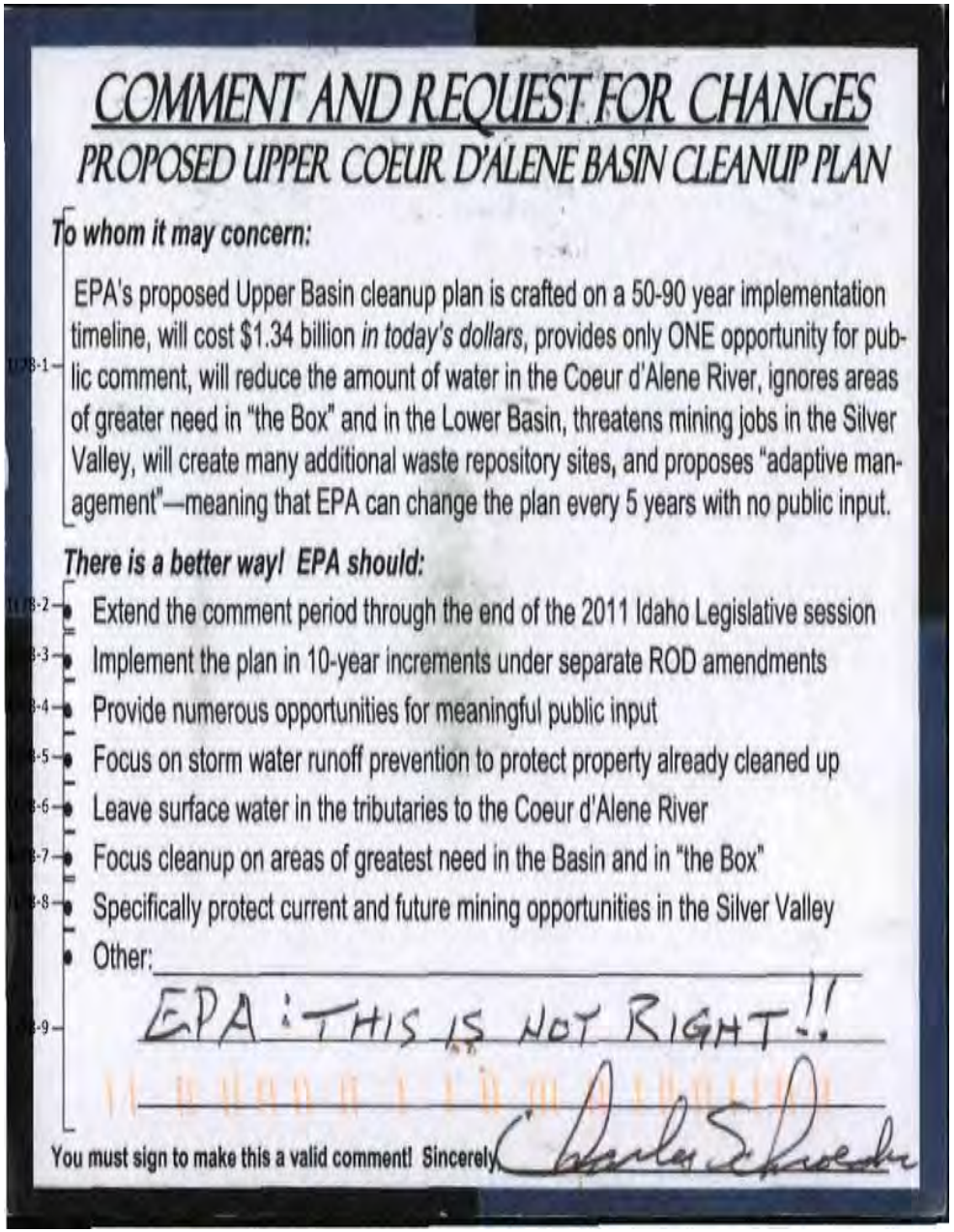
Response to comment I172-5
See response to Comment No. I25-5.

Response to comment I172-6
See response to Comment No. I25-6.

Response to comment I172-7
See response to Comment No. I25-7.

Response to comment I172-8
See response to Comment No. I25-8.

Schroeder, Charles, I178, Letter 1357371



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I178-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I178-2 • Extend the comment period through the end of the 2011 Idaho Legislative session
I178-3 • Implement the plan in 10-year increments under separate ROD amendments
I178-4 • Provide numerous opportunities for meaningful public input
I178-5 • Focus on storm water runoff prevention to protect property already cleaned up
I178-6 • Leave surface water in the tributaries to the Coeur d'Alene River
I178-7 • Focus cleanup on areas of greatest need in the Basin and in "the Box"
I178-8 • Specifically protect current and future mining opportunities in the Silver Valley
• Other: _____

I178-9 EPA: THIS IS NOT RIGHT!!

You must sign to make this a valid comment! Sincerely, Charles Schroeder

Response to comment I178-1
See response to Comment No. I25-1.

Response to comment I178-2
See response to Comment No. I25-2.

Response to comment I178-3
See response to Comment No. I25-3.

Response to comment I178-4
See response to Comment No. I25-4.

Response to comment I178-5
See response to Comment No. I25-5.

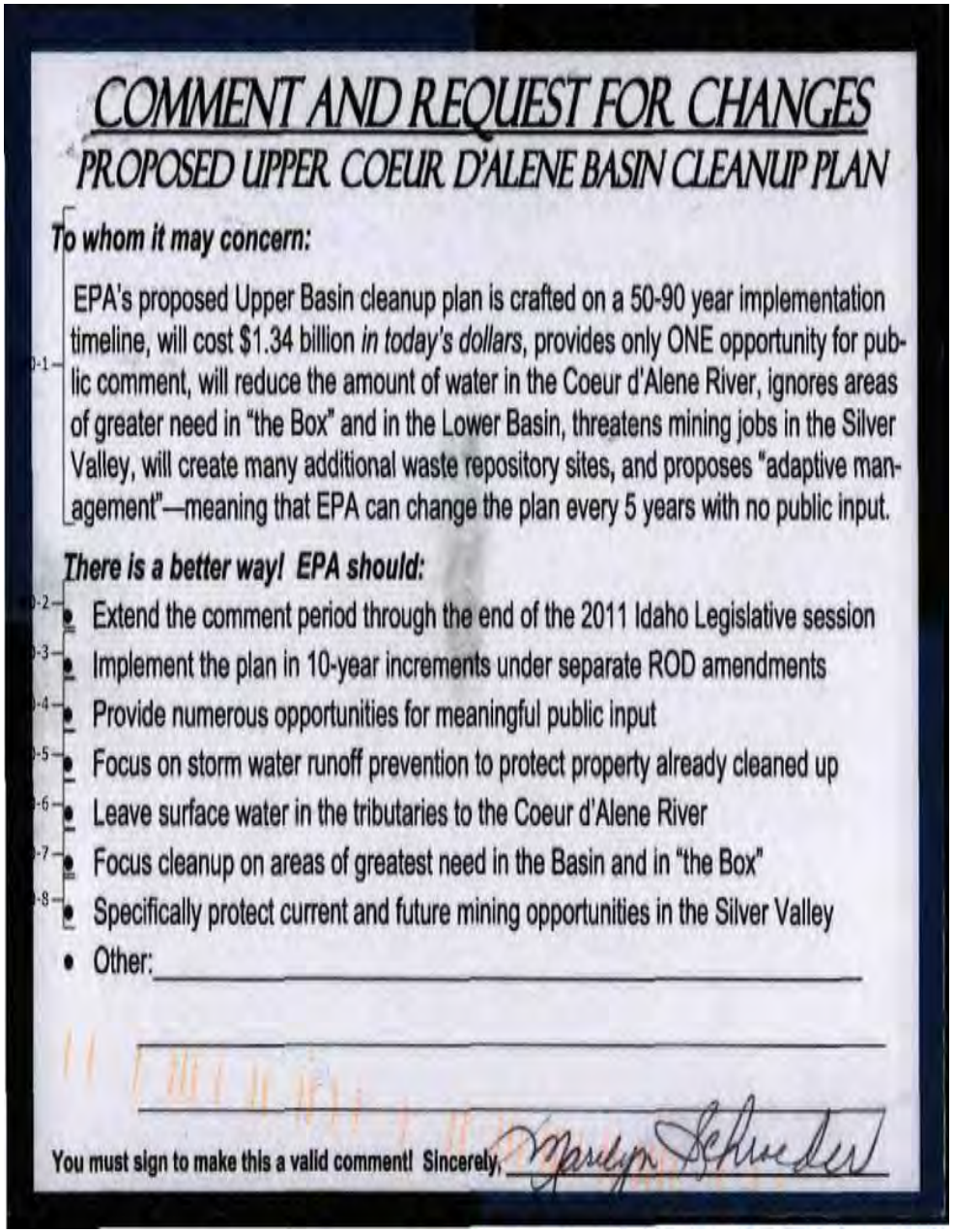
Response to comment I178-6
See response to Comment No. I25-6.

Response to comment I178-7
See response to Comment No. I25-7.

Response to comment I178-8
See response to Comment No. I25-8.

Response to comment I178-9
Comment noted.

Schroeder, Marilyn, I180, Letter 1357402



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I180-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I180-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I180-3 Implement the plan in 10-year increments under separate ROD amendments
- I180-4 Provide numerous opportunities for meaningful public input
- I180-5 Focus on storm water runoff prevention to protect property already cleaned up
- I180-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I180-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I180-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Marilyn Schroeder

Response to comment I180-1
See response to Comment No. I25-1.

Response to comment I180-2
See response to Comment No. I25-2.

Response to comment I180-3
See response to Comment No. I25-3.

Response to comment I180-4
See response to Comment No. I25-4.

Response to comment I180-5
See response to Comment No. I25-5.

Response to comment I180-6
See response to Comment No. I25-6.

Response to comment I180-7
See response to Comment No. I25-7.

Response to comment I180-8
See response to Comment No. I25-8.

Scislo, Chris, I752, Letter 618750

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
cscislo@yahoo.com to: formsubmission 11/17/2010 10:47 PM
Sent by: Cscislo@Yahoo.Com <cscislo=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: chris scislo
Date: 11/17/2010
Brief Overview: EPA's proposed plan is too expensive,too intrusive,too drawn out and doesn't put the residents best interests in the forefront.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts — The plan will have a negative impact on development in the Silver Valley, Legislative Oversight — This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: A solution to the problem needs to be solved with local input and ideas from the ones who live here and not bureaucrats from D.C.
Coeur d'Alene Basin Resident: Yes
Email Address: cscislo@yahoo.com
Mailing Address: 15018 s. dolliver rd.|coeur d alene|idaho|83814|US
Phone Number:

I752-1

I752-2

618750

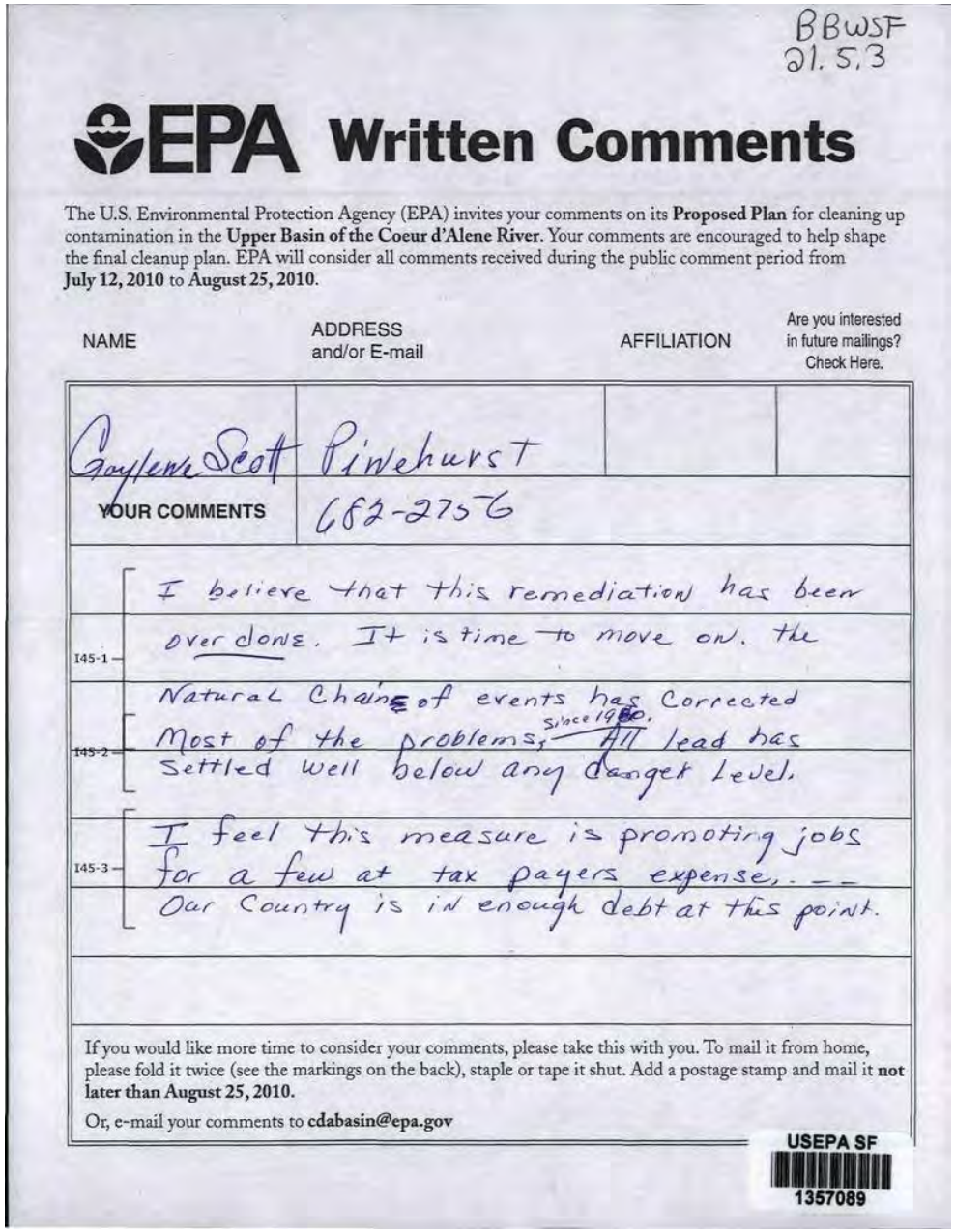
Response to comment I752-1

See response to Comment No. I351-1.

Response to comment I752-2

See responses to Comment Nos. I295-2 and LJ39-5.

Scott, Gaylene, I45, Letter 1357089



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River.** Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010.**

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Gaylene Scott	Pinehurst		
YOUR COMMENTS	682-2756		

I45-1 I believe that this remediation has been over done. It is time to move on. the Natural Chain of events has Corrected

I45-2 Most of the problems, since 1980, All lead has settled well below any danger Level.

I45-3 I feel this measure is promoting jobs for a few at tax payers expense, -- Our Country is in enough debt at this point.

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357089

Response to comment I45-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Although significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses risks to people, wildlife, fish, and the environment. The No Action Alternative was evaluated as part of the recent Final Focused Feasibility Study (FFS) process (EPA, August, 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). However, evaluation results indicate the No Action Alternative would not be protective of human health and the environment.

Response to comment I45-2

While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. EPA is committed and required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to address the remaining unacceptable human health and ecological risks in the Upper Basin.

Response to comment I45-3

Under the Superfund law, EPA has the responsibility and the authority to take actions to protect human health and the environment. See responses to Comment Nos. I54-2 and I295-3.

Scudder, Bill, I23, Letter 897121

EPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan
billscud
to:
CDABasin, Governor
08/21/2010 01:16 PM
Show Details

August 20, 2010

RE: EPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan

It is stupid!

I have lived in the Silver Valley for nearly 40 years. Raised two children and now have three grandchildren. They are all still living here.

I23-1 What the EPA did for the "Box", the 21 square mile area around Kellogg was excellent. That was needed. What is going on now makes no sense. The money that is being wasted is truly a shame. There are just so many good causes this wasted money could go to. I realize it is apple and oranges and that this money is earmark. But it is still millions and millions of dollars.

Here is a small list of some of the things that are currently going on that irritate me.

I23-2 1. The yard clean-ups, why spend thousands of dollars per yard cleaning up horse pastures? Why cleanup the shoulders of roadways (some have been done more than once) - no kids are going to play there. I am betting the road sides in southern CA. area have higher lead levels then we do. I witnessed a whole trailer court get remediated, new soil, sod and black-top only to see it completed ripped up two years later to build houses that never sold. Now the yards around these houses are all tore up. I see they may remediate the County's Transfer station, which is fenced with locked gates. Why?

I23-3 2. The proposed surface/ground water pipeline/treatment plant. HUH? If you really wanted to help- put in a sewage pipeline to capture and treat the untreated sewage going into the creek. Which is a real health concern!

3. Some EPA officials are now showing an "attitude". A we are better than you kind of a thing.

I23-4 Nature is doing a wonderful job of capping most of this minor contamination. Leave her along don't go back in a start stirring things around.

And finally I believe Congress needs to re-evaluate the mission of the EPA.

Sincerely,

Bill and Debby Scudder
PO Box 508
Kingston, ID 83839

897121

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web0867.h... 8/23/2010

Response to comment I23-1

See response to Comment No. I58-2.

Response to comment I23-2

See response to Comment No. I521-9.

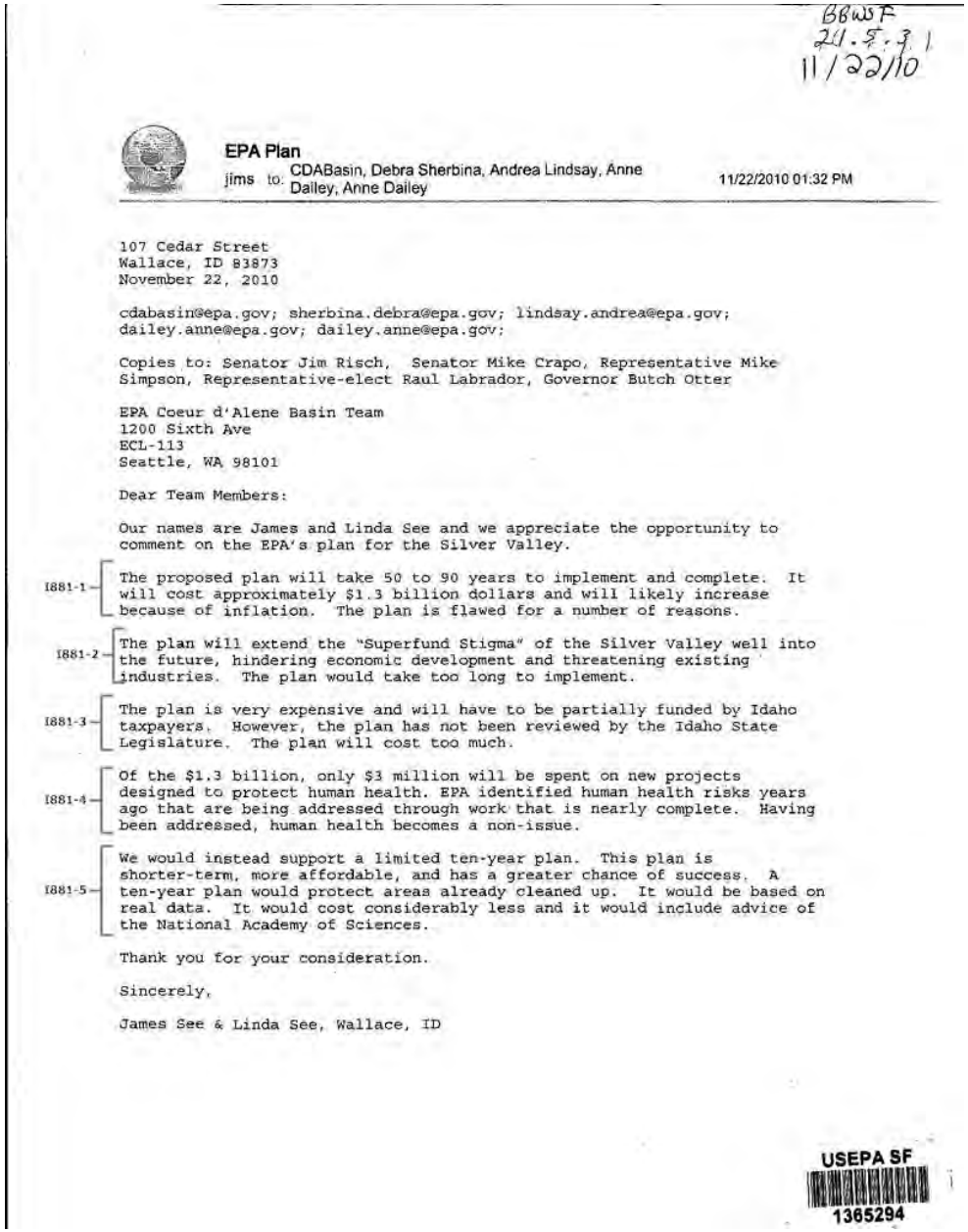
Response to comment I23-3

Comment noted. Addressing sewage discharge through improvements to local infrastructure is outside the scope of the CERCLA cleanup. There are other EPA programs that have in the past provided grants for communities to conduct this type of work.

Response to comment I23-4

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. Although significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses risks to people, wildlife, fish, and the environment. The No Action Alternative was evaluated as part of the recent Final Focused Feasibility Study (FFS) process (EPA, August 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). However, evaluation results indicate the No Action Alternative would not be protective of human health and the environment.

See, James and Linda, I881, Letter 1365294



BBWSF
24.5.3.1
11/22/10

EPA Plan
jims to: CDABasin, Debra Sherbina, Andrea Lindsay, Anne Dailey, Anne Dailey 11/22/2010 01:32 PM

107 Cedar Street
Wallace, ID 83873
November 22, 2010

cdabasin@epa.gov; sherbina.debra@epa.gov; lindsay.andrea@epa.gov; dailey.anne@epa.gov; dailey.anne@epa.gov;

Copies to: Senator Jim Risch, Senator Mike Crapo, Representative Mike Simpson, Representative-elect Raul Labrador, Governor Butch Otter

EPA Coeur d'Alene Basin Team
1200 Sixth Ave
ECL-113
Seattle, WA 98101

Dear Team Members:

Our names are James and Linda See and we appreciate the opportunity to comment on the EPA's plan for the Silver Valley.

I881-1 The proposed plan will take 50 to 90 years to implement and complete. It will cost approximately $1.3 billion dollars and will likely increase because of inflation. The plan is flawed for a number of reasons.

I881-2 The plan will extend the "Superfund Stigma" of the Silver Valley well into the future, hindering economic development and threatening existing industries. The plan would take too long to implement.

I881-3 The plan is very expensive and will have to be partially funded by Idaho taxpayers. However, the plan has not been reviewed by the Idaho State Legislature. The plan will cost too much.

I881-4 Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete. Having been addressed, human health becomes a non-issue.

I881-5 We would instead support a limited ten-year plan. This plan is shorter-term, more affordable, and has a greater chance of success. A ten-year plan would protect areas already cleaned up. It would be based on real data. It would cost considerably less and it would include advice of the National Academy of Sciences.

Thank you for your consideration.

Sincerely,

James See & Linda See, Wallace, ID

USEPA SF
1365294

Response to comment I881-1
See responses to Comment Nos. I58-1 and I58-2.

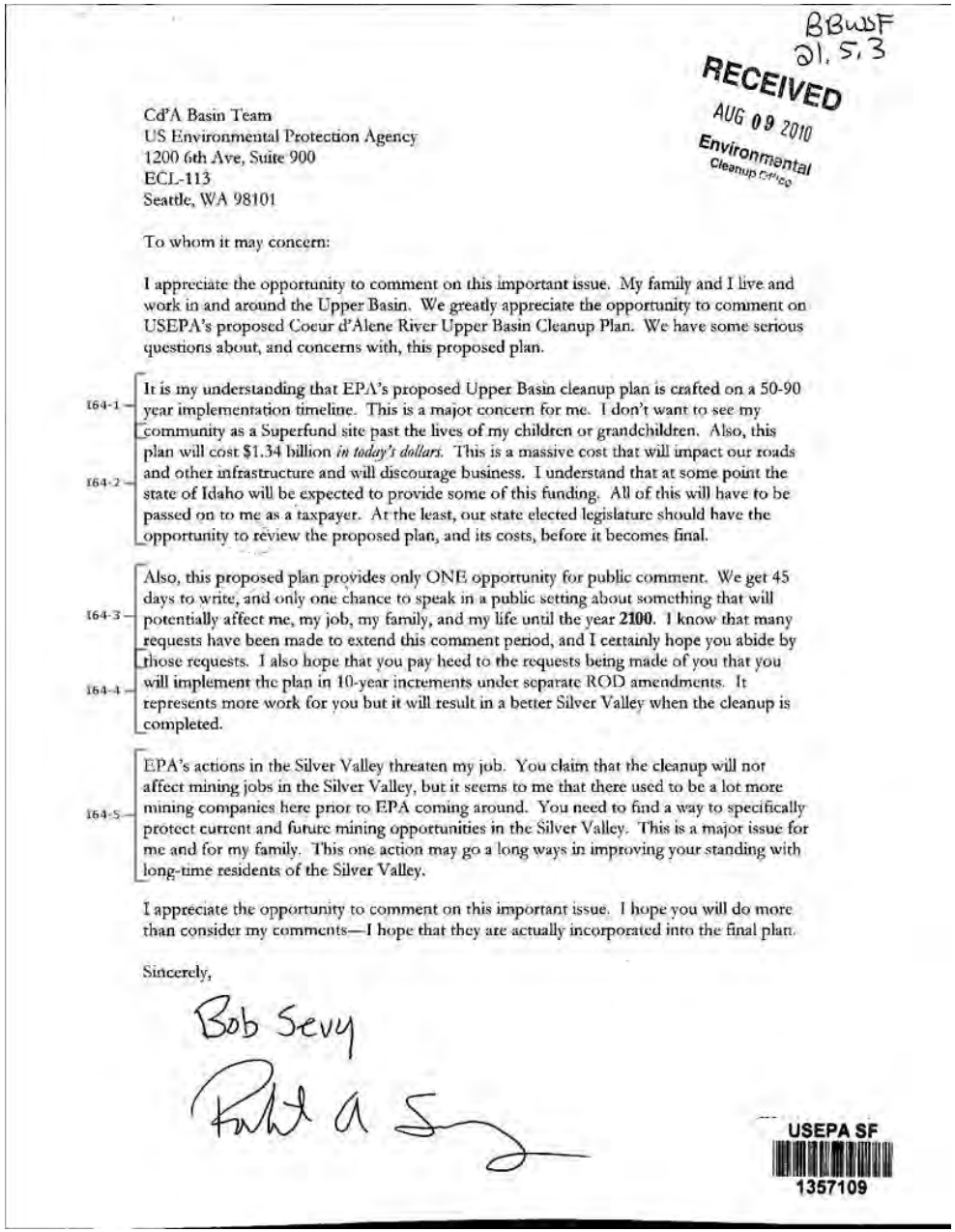
Response to comment I881-2
See response to Comment No. I474-1.

Response to comment I881-3
See responses to Comment Nos. I58-2 and LJ39-5.

Response to comment I881-4
The Upper Basin Selected Remedy includes an estimated $33.9 million for remedy protection work in the Upper Basin. Remedy protection is intended to protect the existing human health clean soil barriers (e.g., remediated yards and rights-of-way) within Upper Basin communities from tributary flooding and high-precipitation events. In addition to the remedy protection work, cleanup actions that address mine waste contamination within drainage areas accessible for recreational use will protect human health and improve surface water quality. Common recreational activities in the Coeur d'Alene Basin include hiking, fishing, hunting, boating, swimming, and all-terrain-vehicle riding. As noted in the ROD Amendment, Part 3, Section 3.2.4, exposure to lead contamination can cause elevated blood lead levels. EPA has also found that elevated blood lead levels can occur within relatively short exposure periods (such as through recreational exposure to contamination located along the SFCDR, on waste piles, etc.). The Selected Remedy will provide clean surface soil in contaminated areas and reduce particulate lead loading to surface water. In these ways, the Selected Remedy will further reduce the risks people may be exposed to during recreational activities. Also see response to Comment No. I295-1.

Response to comment I881-5
See response to Comment No. I474-2.

Sevy, Bob, I64, Letter 1357109



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I64-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the I64-2 state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will I64-3 potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you I64-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more I64-5 mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Bob Sevy

USEPA SF
1357109

Response to comment I64-1
See response to Comment No. I58-1.

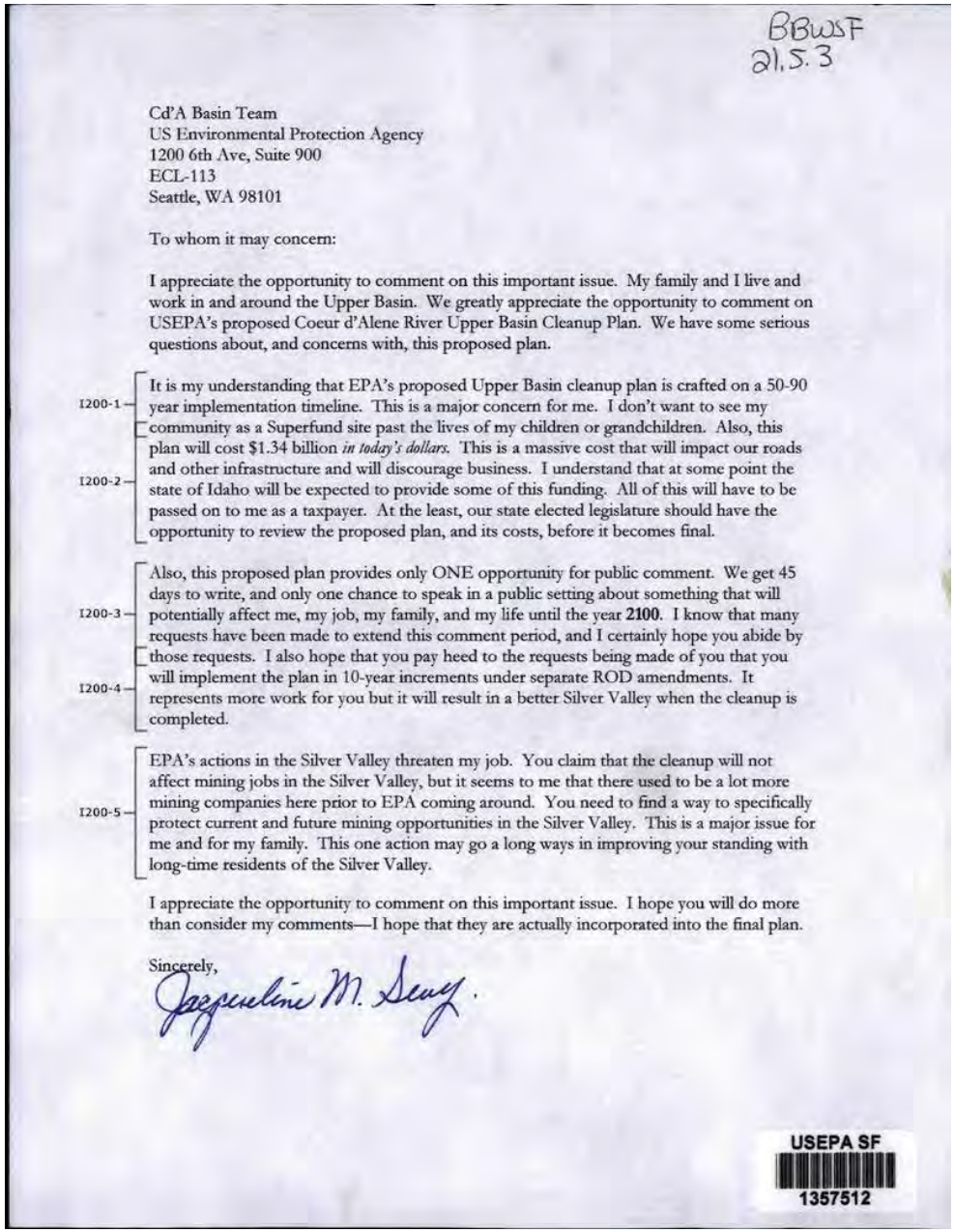
Response to comment I64-2
See response to Comment No. I58-2.

Response to comment I64-3
See response to Comment No. I58-3.

Response to comment I64-4
See response to Comment No. I58-4.

Response to comment I64-5
See response to Comment No. I58-5.

Sevy, Jacqueline, I200, Letter 1357512



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I200-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I200-2

I200-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I200-4

I200-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Jacqueline M. Sevy

USEPA SF
1357512

Response to comment I200-1
See response to Comment No. I58-1.

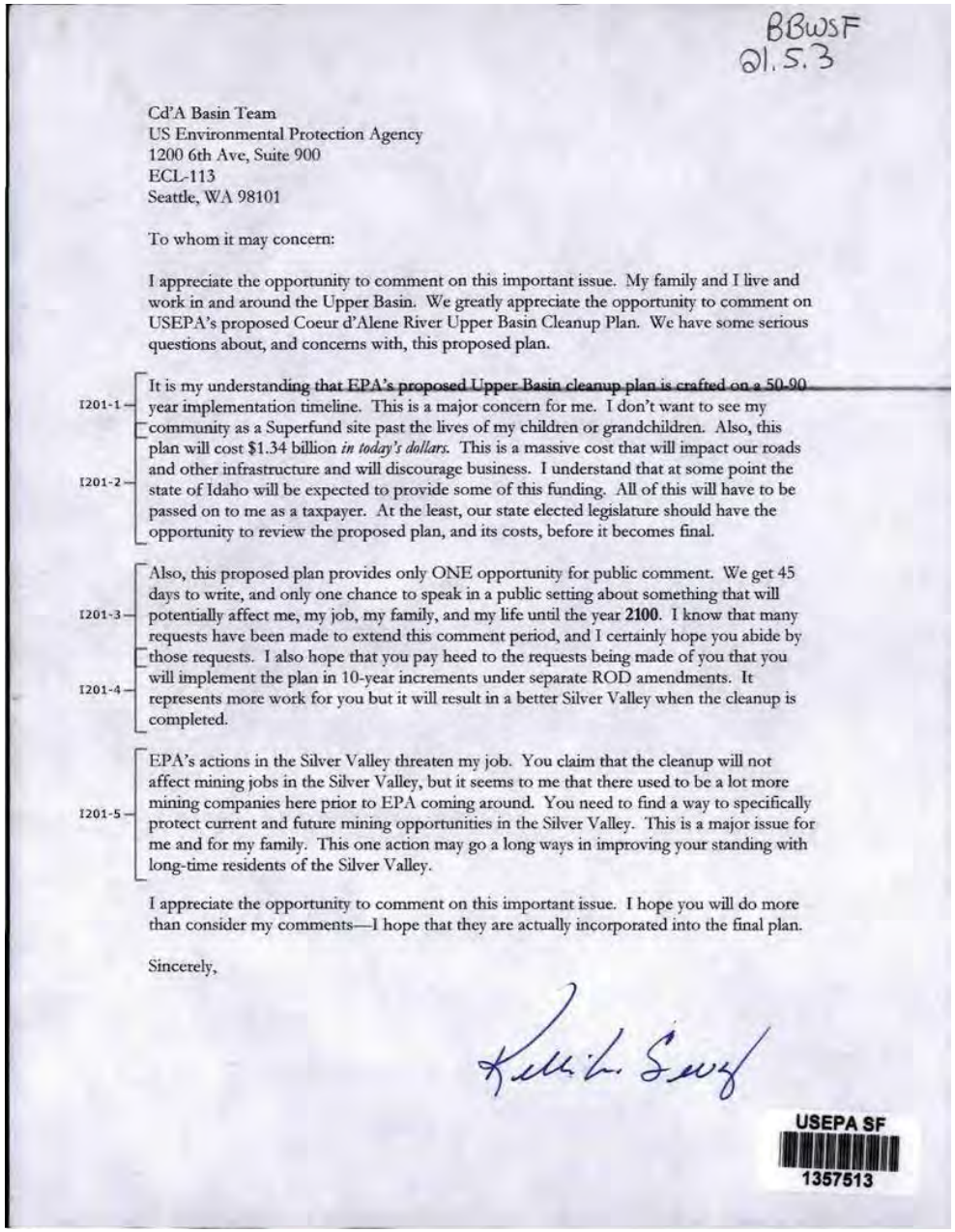
Response to comment I200-2
See response to Comment No. I58-2.

Response to comment I200-3
See response to Comment No. I58-3.

Response to comment I200-4
See response to Comment No. I58-4.

Response to comment I200-5
See response to Comment No. I58-5.

Sevy, Kell, I201, Letter 1357513



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I201-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the I201-2 state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will I201-3 potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you I201-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more I201-5 mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Kell Sevy

USEPA SF
1357513

Response to comment I201-1
See response to Comment No. I58-1.

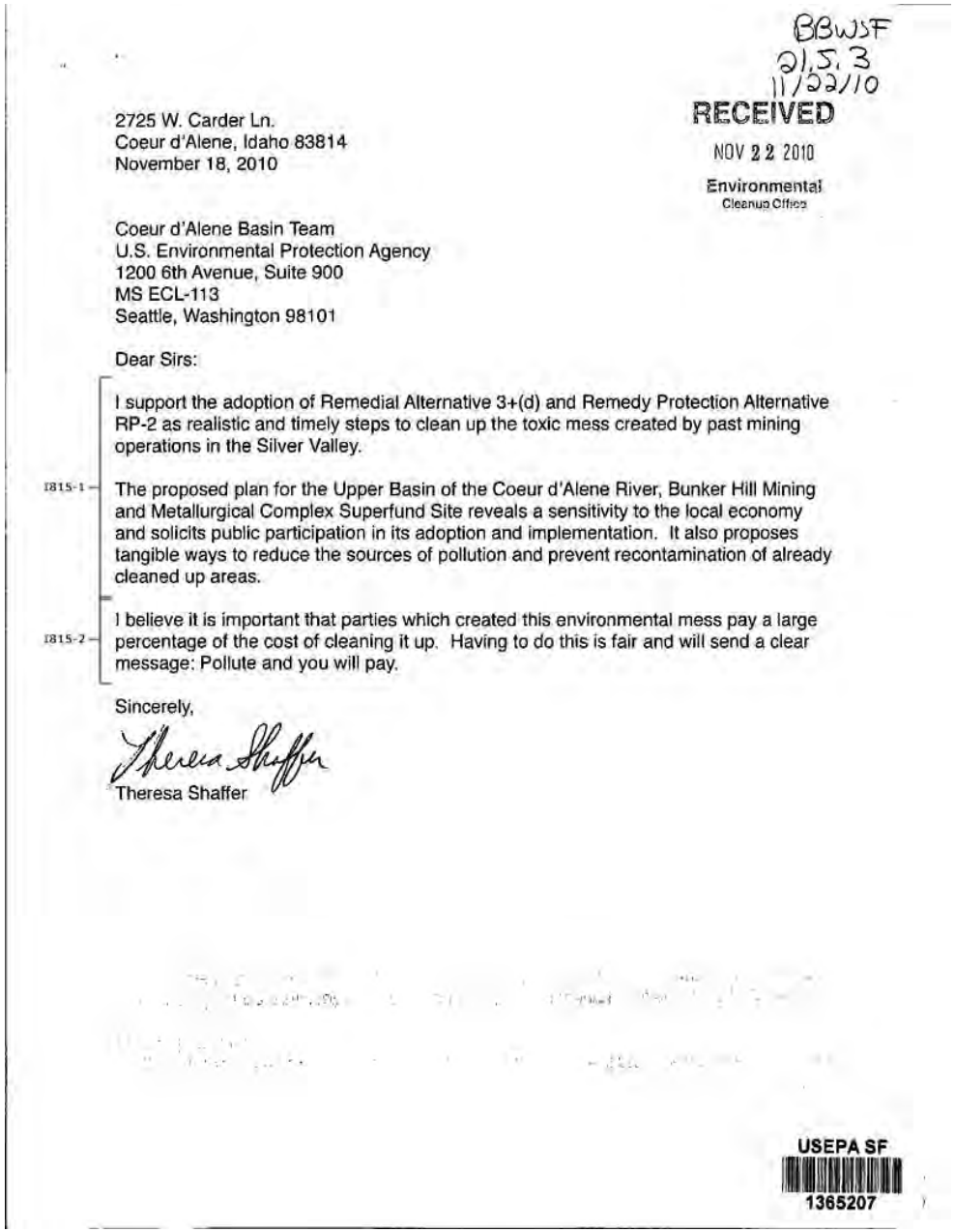
Response to comment I201-2
See response to Comment No. I58-2.

Response to comment I201-3
See response to Comment No. I58-3.

Response to comment I201-4
See response to Comment No. I58-4.

Response to comment I201-5
See response to Comment No. I58-5.

Shaffer, Theresa, I815, Letter 1365207



BBWSF
21.5.3
11/22/10

RECEIVED
NOV 22 2010
Environmental
Cleanup Office

2725 W. Carder Ln.
Coeur d'Alene, Idaho 83814
November 18, 2010

Coeur d'Alene Basin Team
U.S. Environmental Protection Agency
1200 6th Avenue, Suite 900
MS ECL-113
Seattle, Washington 98101

Dear Sirs:

I support the adoption of Remedial Alternative 3+(d) and Remedy Protection Alternative RP-2 as realistic and timely steps to clean up the toxic mess created by past mining operations in the Silver Valley.

I815-1 The proposed plan for the Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site reveals a sensitivity to the local economy and solicits public participation in its adoption and implementation. It also proposes tangible ways to reduce the sources of pollution and prevent recontamination of already cleaned up areas.

I815-2 I believe it is important that parties which created this environmental mess pay a large percentage of the cost of cleaning it up. Having to do this is fair and will send a clear message: Pollute and you will pay.

Sincerely,

Theresa Shaffer

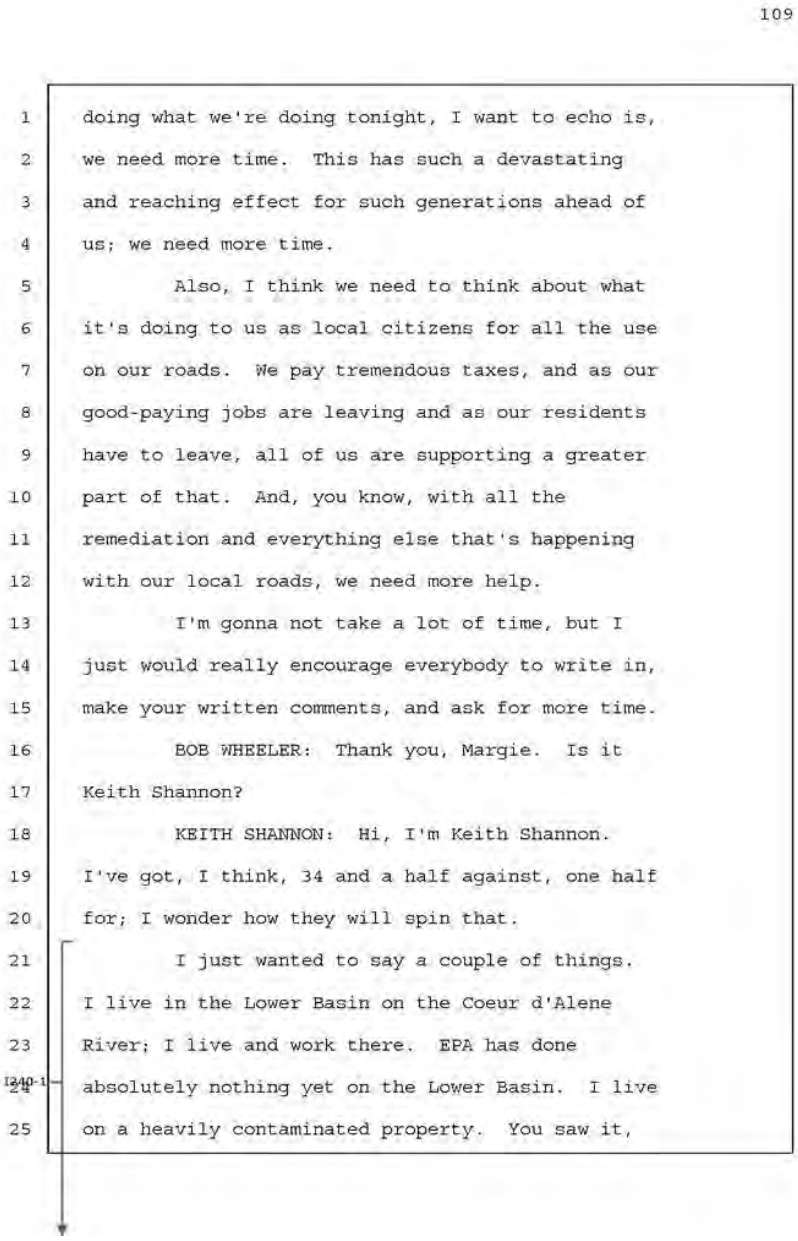
Theresa Shaffer

USEPA SF
1365207

Response to comment I815-1
Comment noted and appreciated.

Response to comment I815-2
See response to Comment No. I295-3.

Shannon, Keith, I240, Letter 610097-35



109

doing what we're doing tonight, I want to echo is, we need more time. This has such a devastating and reaching effect for such generations ahead of us; we need more time.

Also, I think we need to think about what it's doing to us as local citizens for all the use on our roads. We pay tremendous taxes, and as our good-paying jobs are leaving and as our residents have to leave, all of us are supporting a greater part of that. And, you know, with all the remediation and everything else that's happening with our local roads, we need more help.

I'm gonna not take a lot of time, but I just would really encourage everybody to write in, make your written comments, and ask for more time.

BOB WHEELER: Thank you, Margie. Is it Keith Shannon?

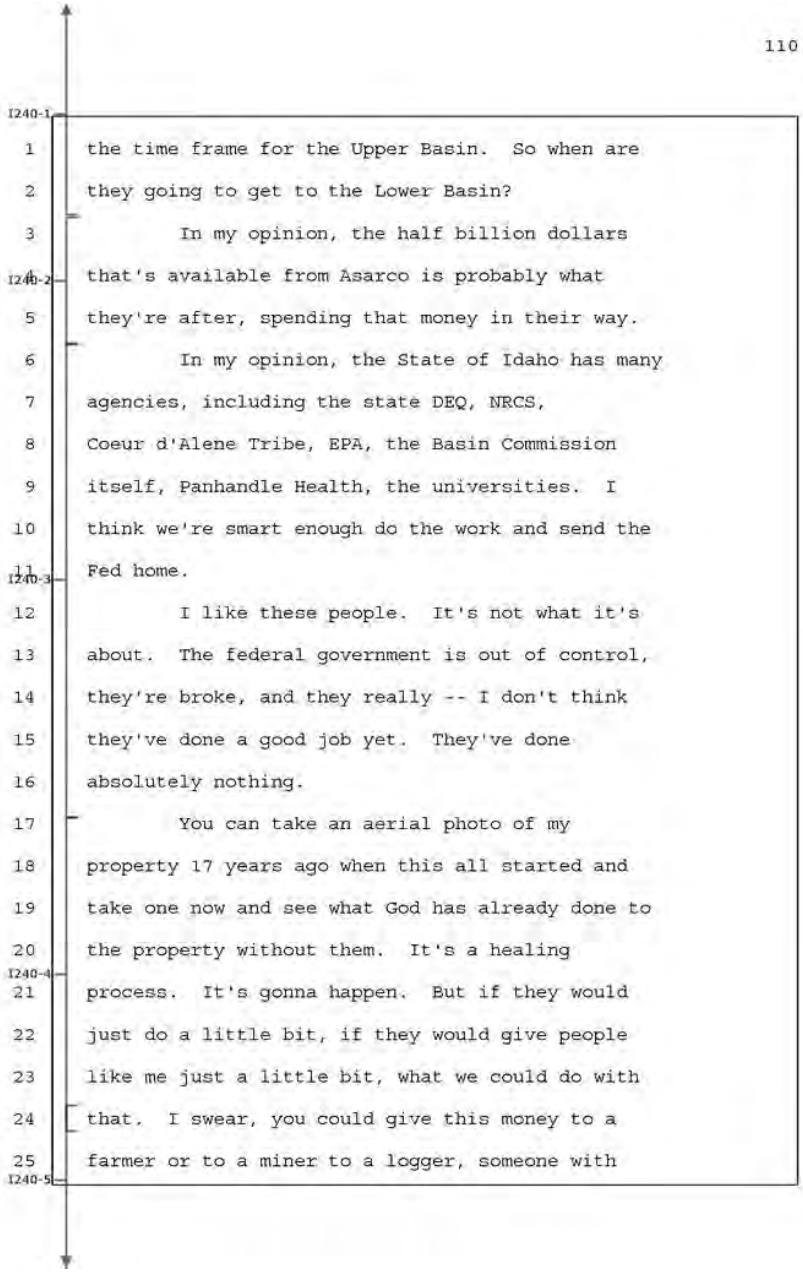
KEITH SHANNON: Hi, I'm Keith Shannon. I've got, I think, 34 and a half against, one half for; I wonder how they will spin that.

I just wanted to say a couple of things. I live in the Lower Basin on the Coeur d'Alene River; I live and work there. EPA has done absolutely nothing yet on the Lower Basin. I live on a heavily contaminated property. You saw it,

I240-1

Response to comment I240-1

Work in the Lower Basin is continuing with additional characterization and refinement of the Conceptual Site Model and will likely include pilot projects. EPA continues to pursue data collection and analysis efforts in the Lower Basin to support the future development and evaluation of remedial alternatives. After these studies have been completed, EPA expects to select additional cleanup actions, subject to public comment, to address contamination issues in the Lower Basin. Although the Lower Basin is not included in the Selected Remedy, actions in the Upper Basin are expected to improve water quality and reduce the movement of contaminated sediments downstream in the Lower Basin. Thus, the Upper Basin cleanup is expected to complement cleanup activities in the Lower Basin by reducing the flow of contaminated materials and reducing the potential for recontamination from the Upper Basin to the Lower Basin. Actions in the Lower Basin will be conducted concurrently with Upper Basin cleanups depending on recontamination and other factors.



110

I240-1

the time frame for the Upper Basin. So when are they going to get to the Lower Basin?

In my opinion, the half billion dollars

I240-2

that's available from Asarco is probably what they're after, spending that money in their way.

In my opinion, the State of Idaho has many agencies, including the state DEQ, NRCS, Coeur d'Alene Tribe, EPA, the Basin Commission itself, Panhandle Health, the universities. I think we're smart enough do the work and send the

I240-3

Fed home.

I like these people. It's not what it's about. The federal government is out of control, they're broke, and they really -- I don't think they've done a good job yet. They've done absolutely nothing.

You can take an aerial photo of my property 17 years ago when this all started and take one now and see what God has already done to the property without them. It's a healing

I240-4

process. It's gonna happen. But if they would just do a little bit, if they would give people like me just a little bit, what we could do with that. I swear, you could give this money to a farmer or to a miner to a logger, someone with

I240-5

Response to comment I240-2

Regarding funding of the cleanup in the Upper and Lower Basins, see response to Comment No. I295-3 and the ROD Amendment, Part 3, Section 3.9.

Response to comment I240-3

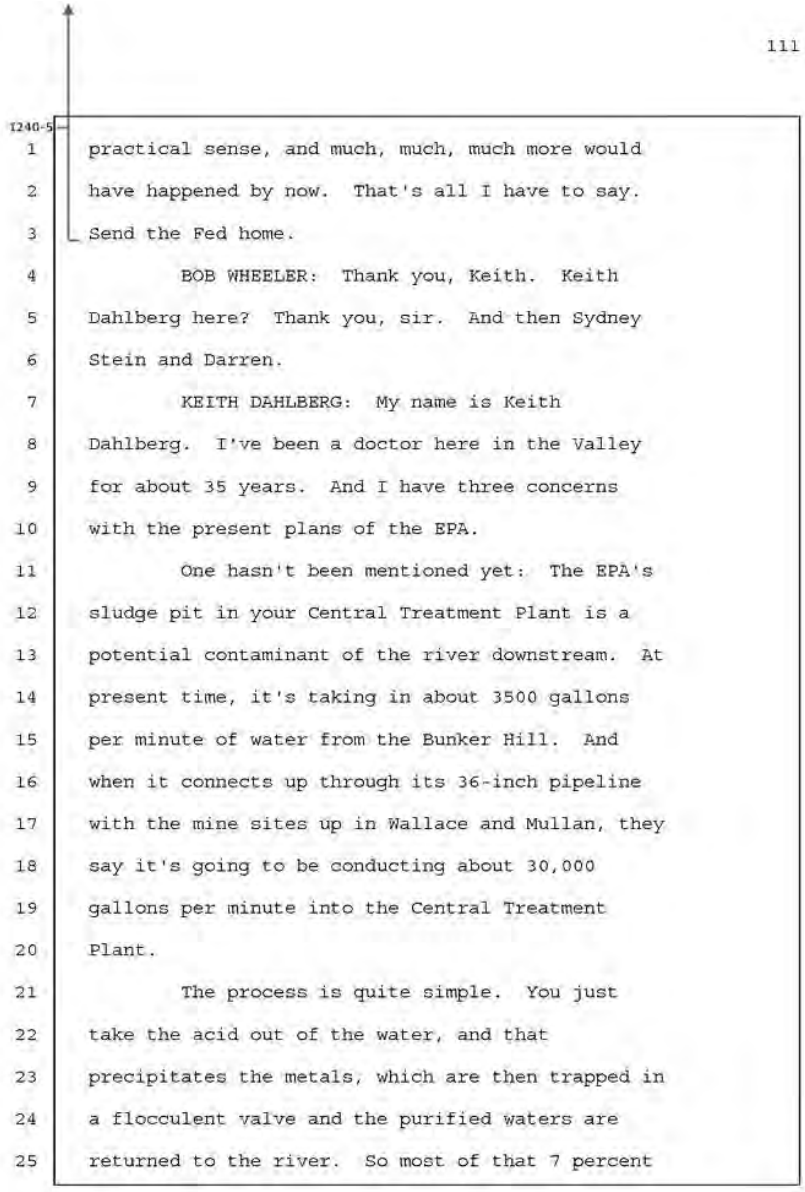
Comment noted.

Response to comment I240-4

There are serious risks to human health from heavy metal contamination in the Basin. The risks are well documented. EPA has a regulatory responsibility to address these risks. Lead is of most concern, especially for young children and pregnant women. Though some cleanup has been done, there is more work to do to protect people.

Response to comment I240-5

Comment noted.



111

I240-5

practical sense, and much, much, much more would have happened by now. That's all I have to say. Send the Fed home.

BOB WHEELER: Thank you, Keith. Keith Dahlberg here? Thank you, sir. And then Sydney Stein and Darren.

KEITH DAHLBERG: My name is Keith Dahlberg. I've been a doctor here in the Valley for about 35 years. And I have three concerns with the present plans of the EPA.

One hasn't been mentioned yet: The EPA's sludge pit in your Central Treatment Plant is a potential contaminant of the river downstream. At present time, it's taking in about 3500 gallons per minute of water from the Bunker Hill. And when it connects up through its 36-inch pipeline with the mine sites up in Wallace and Mullan, they say it's going to be conducting about 30,000 gallons per minute into the Central Treatment Plant.

The process is quite simple. You just take the acid out of the water, and that precipitates the metals, which are then trapped in a flocculent valve and the purified waters are returned to the river. So most of that 7 percent

No comments

Shannon, Keith, I753, Letter 618751

Clean up comments
Keith Shannon
to:
CDABasin
11/17/2010 10:20 AM
Show Details

I753-1 To Whom it may concern, I'm opposed to extending the cleanup of our valley with the EPA. I believe the EPA will harm our valley in ways much worse than the heavy metal contamination. I believe the EPA should go back to Washington, DC. and clean up that toxic cesspool. Has anyone in the EPA recently looked at the Federal budget deficit? Really does the Fed have the money to stay in Idaho for this extended period? Idaho has 1/2 billion dollars in the bank, Idaho has plenty of smart people to manage that money and the clean up. EPA has not done what they said they would do when they started. That makes them liars. I live on super fund ground and EPA has never once offered to help mitigate the effects of heavy metals on my property. The local NRCS has gotten work done. I'll go with the smaller bureaucracy to get things done any day. I753-2

Please Please Please EPA go home!

Keith Shannon

Keith Shannon
President
(208) 689-3248 - Tel
(208) 755-3290 – Cell

www.HDBmarine.com

618751

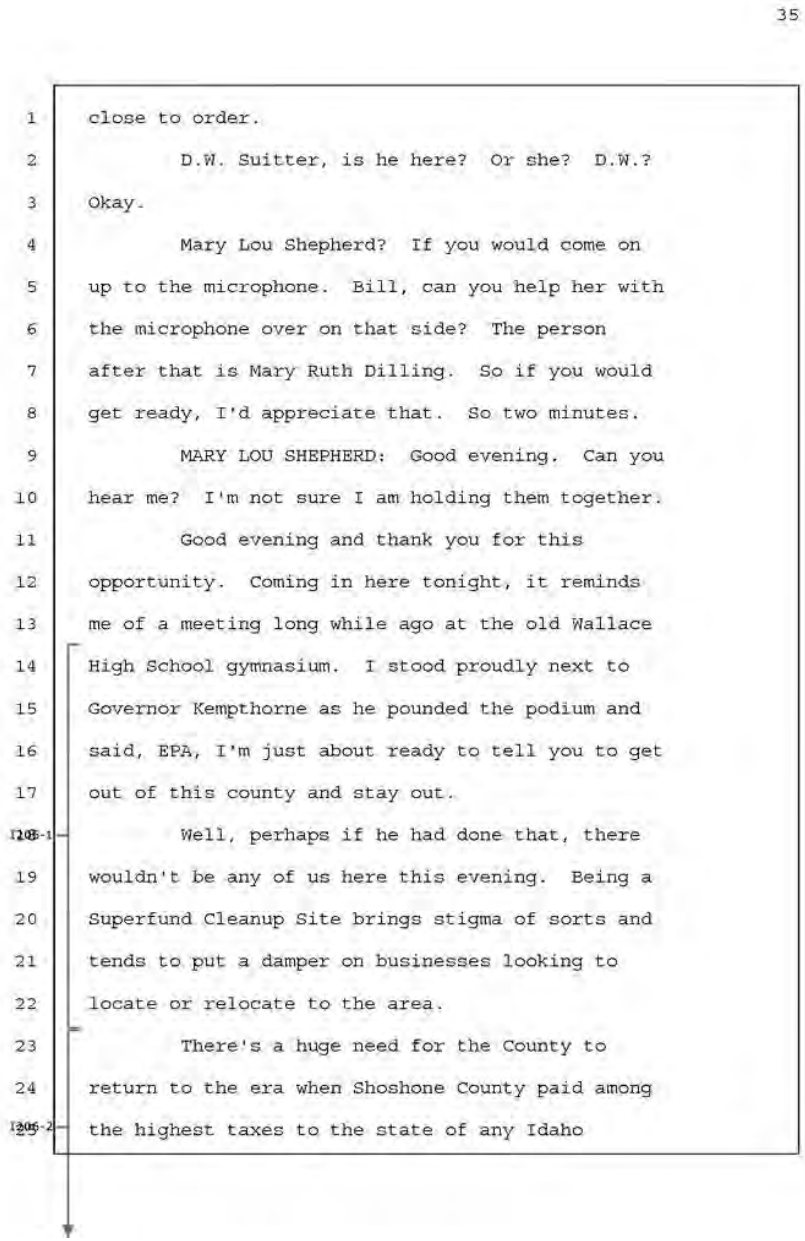
Response to comment I753-1

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. As described in the FFS, Proposed Plan and ROD Amendment, numerous studies over the years have documented these risks. The Selected Remedy is expected to make significant progress towards addressing these risks.

Response to comment I753-2

Regarding the funding of the Selected Remedy, see response to Comment No. I295-3.

Shepard, Mary Lou, I206, Letter 610097-1



35

close to order.

D.W. Suitter, is he here? Or she? D.W.? Okay.

Mary Lou Shepherd? If you would come on up to the microphone. Bill, can you help her with the microphone over on that side? The person after that is Mary Ruth Dilling. So if you would get ready, I'd appreciate that. So two minutes.

MARY LOU SHEPHERD: Good evening. Can you hear me? I'm not sure I am holding them together.

Good evening and thank you for this opportunity. Coming in here tonight, it reminds me of a meeting long while ago at the old Wallace High School gymnasium. I stood proudly next to Governor Kempthorne as he pounded the podium and said, EPA, I'm just about ready to tell you to get out of this county and stay out.

I206-1 Well, perhaps if he had done that, there wouldn't be any of us here this evening. Being a Superfund Cleanup Site brings stigma of sorts and tends to put a damper on businesses looking to locate or relocate to the area.

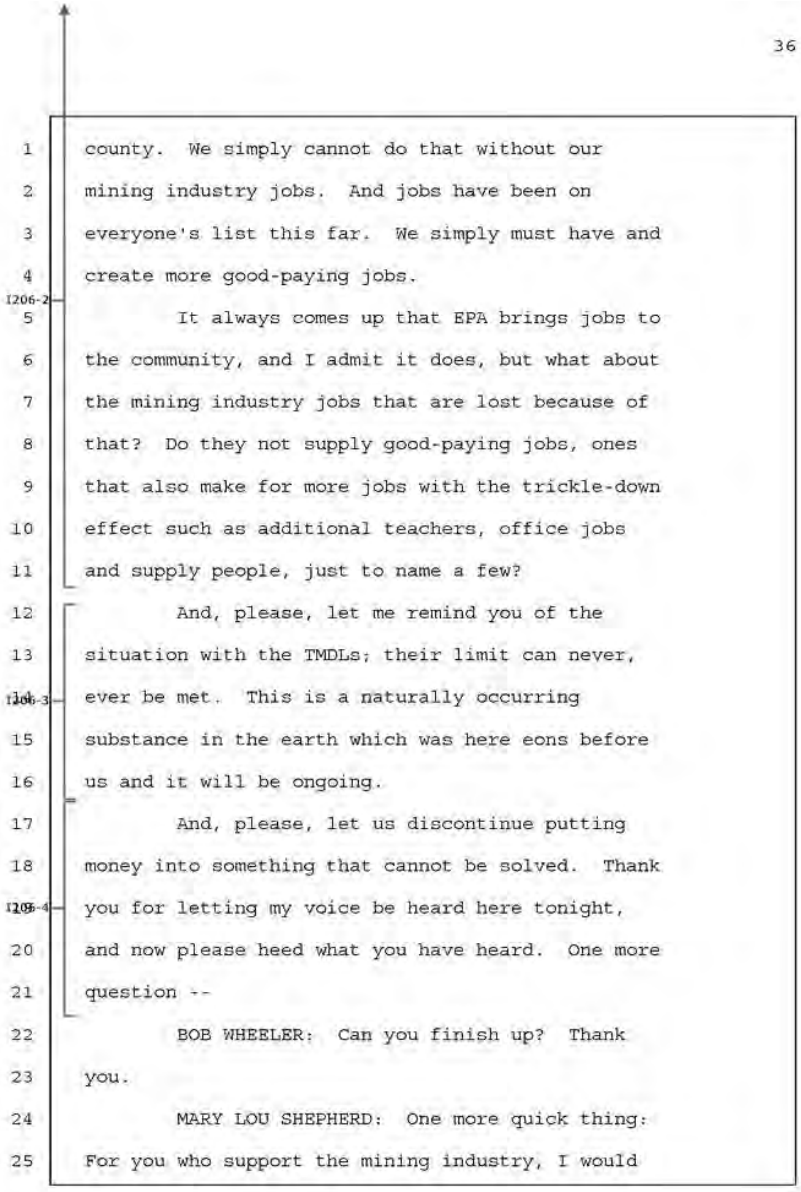
There's a huge need for the County to return to the era when Shoshone County paid among I206-2 the highest taxes to the state of any Idaho

Response to comment I206-1

See response to Comment No. I474-1.

Response to comment I206-2

See responses to Comment Nos. I58-5 and LC32-2.



36

county. We simply cannot do that without our mining industry jobs. And jobs have been on everyone's list this far. We simply must have and create more good-paying jobs.

I206-2

It always comes up that EPA brings jobs to the community, and I admit it does, but what about the mining industry jobs that are lost because of that? Do they not supply good-paying jobs, ones that also make for more jobs with the trickle-down effect such as additional teachers, office jobs and supply people, just to name a few?

And, please, let me remind you of the situation with the TMDLs; their limit can never, ever be met. This is a naturally occurring

I206-3

substance in the earth which was here eons before us and it will be ongoing.

And, please, let us discontinue putting money into something that cannot be solved. Thank

I206-4

you for letting my voice be heard here tonight, and now please heed what you have heard. One more question --

BOB WHEELER: Can you finish up? Thank you.

MARY LOU SHEPHERD: One more quick thing: For you who support the mining industry, I would

Response to comment I206-3

See response to Comment No. LC33-8.

Response to comment I206-4

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Regarding the Selected Remedy, see response to Comment No. I58-1.

No comments

like to make a little reminder to you that the mining license plates are now for sale at the courthouse. Thank you.

BOB WHEELER: I want to thank you for starting us right at two minutes, so thank you very much.

Mary Ruth Dilling and then Ray Hansen and then Ron Hood. So if you get ready to get up here.

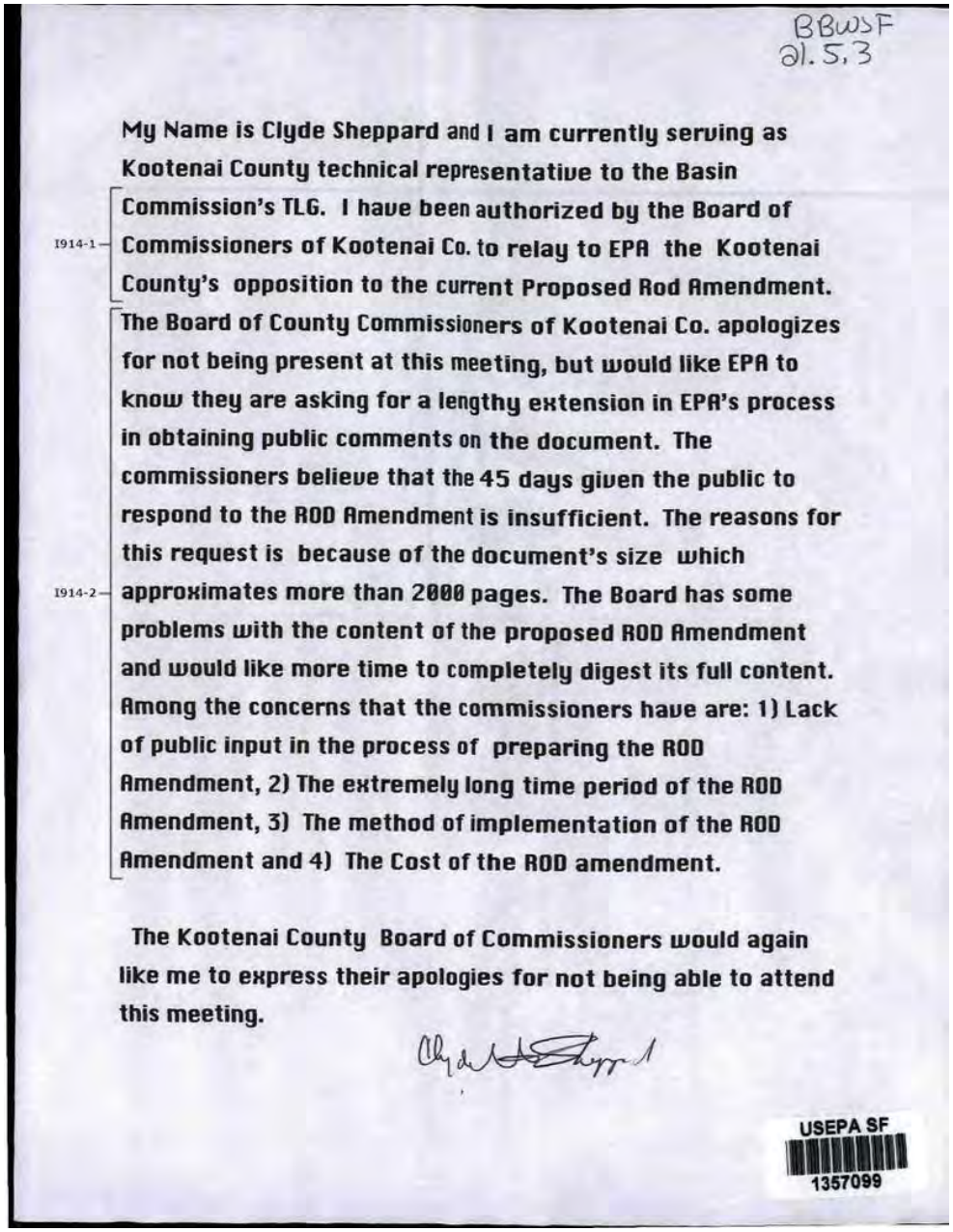
MARY RUTH DILLING: I'm gonna bring up, reiterate, some points that Mary Lou made.

One, Idaho does have a natural mineralization, which is why we have high levels. It was shown in the bar. They do not mention what our numbers are.

I was informed tonight that a while ago that soil was taken from under the Mission long ago and that the numbers in that soil are the same as they are elsewhere here that we're trying to clean up. That doesn't make sense.

So what are we trying to clean up that's naturally there? The sites on the chart showing the highest levels are not where most of the work is being done. The chart says 5 percent lessening of the water level. I've talked with various EPA

Sheppard, Clyde, I914, Letter 1357099



BBWSF
21.5.3

My Name is Clyde Sheppard and I am currently serving as Kootenai County technical representative to the Basin Commission's TLG. I have been authorized by the Board of
I914-1 Commissioners of Kootenai Co. to relay to EPA the Kootenai County's opposition to the current Proposed Rod Amendment.

The Board of County Commissioners of Kootenai Co. apologizes for not being present at this meeting, but would like EPA to know they are asking for a lengthy extension in EPA's process in obtaining public comments on the document. The commissioners believe that the 45 days given the public to respond to the ROD Amendment is insufficient. The reasons for this request is because of the document's size which
I914-2 approximates more than 2000 pages. The Board has some problems with the content of the proposed ROD Amendment and would like more time to completely digest its full content. Among the concerns that the commissioners have are: 1) Lack of public input in the process of preparing the ROD Amendment, 2) The extremely long time period of the ROD Amendment, 3) The method of implementation of the ROD Amendment and 4) The Cost of the ROD amendment.

The Kootenai County Board of Commissioners would again like me to express their apologies for not being able to attend this meeting.

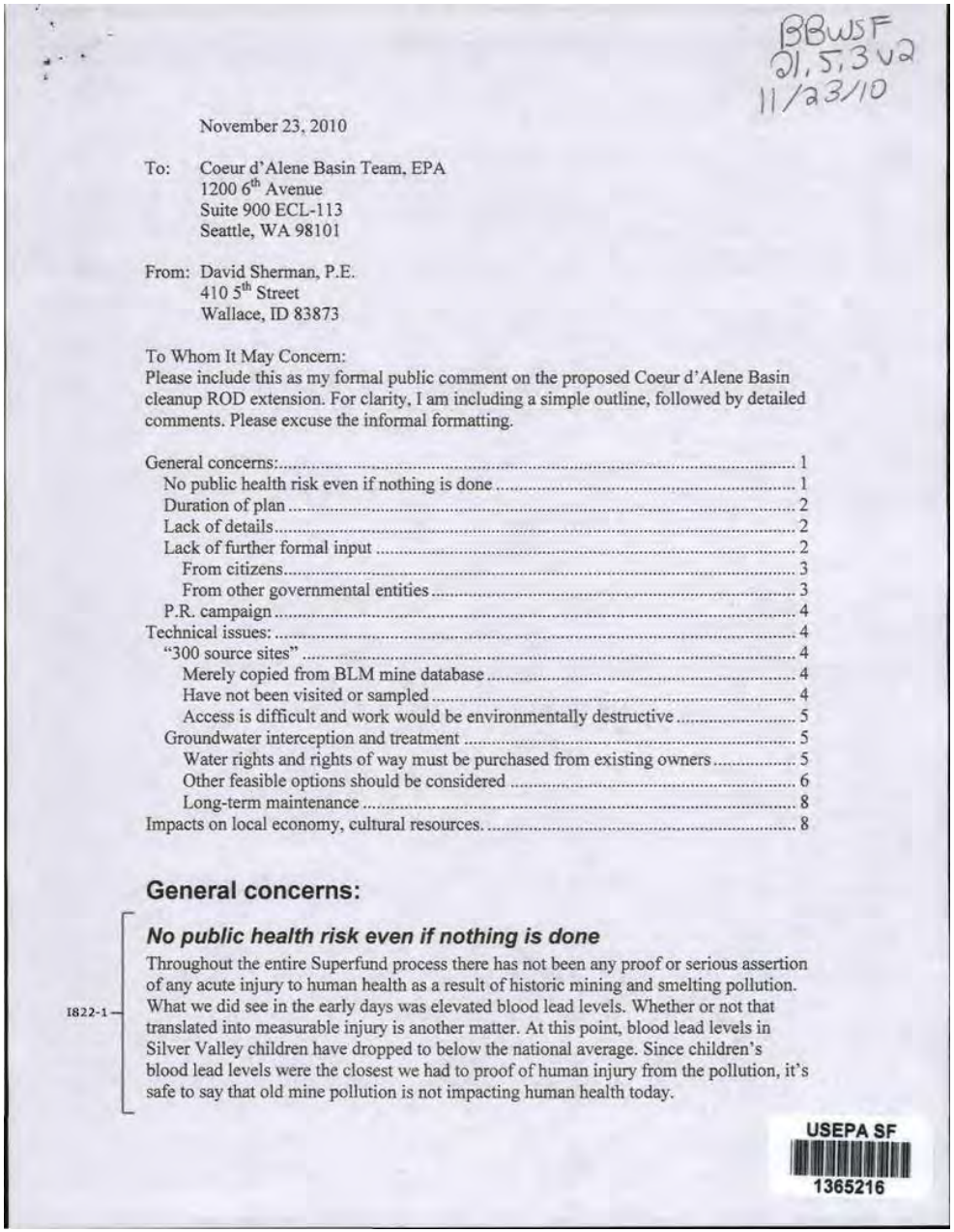
Clyde Sheppard

USEPA SF
1357099

Response to comment I914-1
Thank you for your comment.

Response to comment I914-2
See response to Comment No. I54-6.

Sherman, David, I822, Letter 1365216



BBWSF
21,5,3 v2
11/23/10

November 23, 2010

To: Coeur d'Alene Basin Team, EPA
1200 6th Avenue
Suite 900 ECL-113
Seattle, WA 98101

From: David Sherman, P.E.
410 5th Street
Wallace, ID 83873

To Whom It May Concern:
Please include this as my formal public comment on the proposed Coeur d'Alene Basin cleanup ROD extension. For clarity, I am including a simple outline, followed by detailed comments. Please excuse the informal formatting.

General concerns:..... 1
No public health risk even if nothing is done..... 1
Duration of plan..... 2
Lack of details..... 2
Lack of further formal input..... 2
From citizens..... 3
From other governmental entities..... 3
P.R. campaign..... 4
Technical issues:..... 4
"300 source sites"..... 4
Merely copied from BLM mine database..... 4
Have not been visited or sampled..... 4
Access is difficult and work would be environmentally destructive..... 5
Groundwater interception and treatment..... 5
Water rights and rights of way must be purchased from existing owners..... 5
Other feasible options should be considered..... 6
Long-term maintenance..... 8
Impacts on local economy, cultural resources..... 8

General concerns:

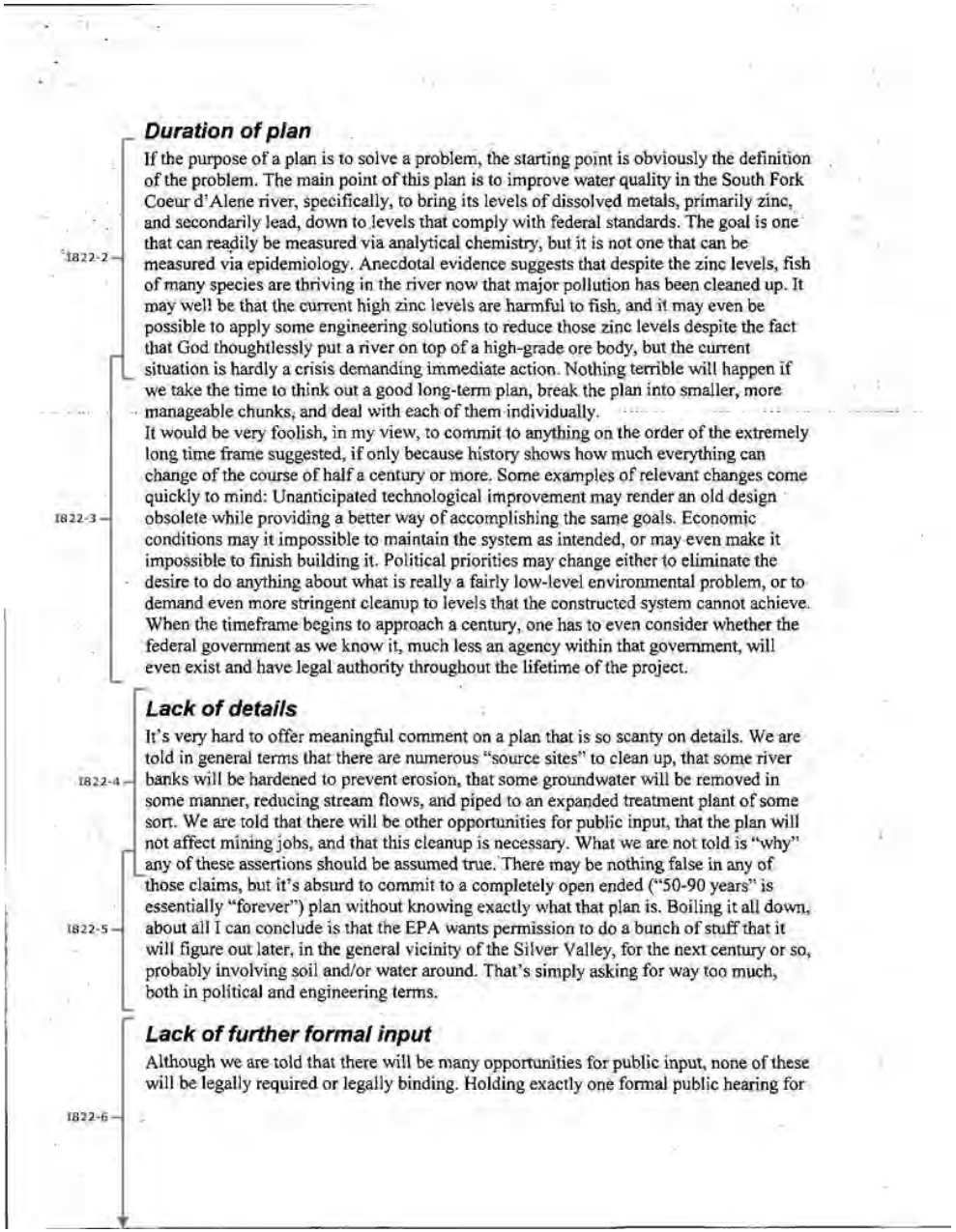
No public health risk even if nothing is done

I822-1 Throughout the entire Superfund process there has not been any proof or serious assertion of any acute injury to human health as a result of historic mining and smelting pollution. What we did see in the early days was elevated blood lead levels. Whether or not that translated into measurable injury is another matter. At this point, blood lead levels in Silver Valley children have dropped to below the national average. Since children's blood lead levels were the closest we had to proof of human injury from the pollution, it's safe to say that old mine pollution is not impacting human health today.

USEPA SF
1365216

Response to comment I822-1

See response to Comment No. I295-1.



Duration of plan

If the purpose of a plan is to solve a problem, the starting point is obviously the definition of the problem. The main point of this plan is to improve water quality in the South Fork Coeur d'Alene river, specifically, to bring its levels of dissolved metals, primarily zinc, and secondarily lead, down to levels that comply with federal standards. The goal is one that can readily be measured via analytical chemistry, but it is not one that can be measured via epidemiology. Anecdotal evidence suggests that despite the zinc levels, fish of many species are thriving in the river now that major pollution has been cleaned up. It may well be that the current high zinc levels are harmful to fish, and it may even be possible to apply some engineering solutions to reduce those zinc levels despite the fact that God thoughtlessly put a river on top of a high-grade ore body, but the current situation is hardly a crisis demanding immediate action. Nothing terrible will happen if we take the time to think out a good long-term plan, break the plan into smaller, more manageable chunks, and deal with each of them individually.

I822-2

It would be very foolish, in my view, to commit to anything on the order of the extremely long time frame suggested, if only because history shows how much everything can change of the course of half a century or more. Some examples of relevant changes come quickly to mind: Unanticipated technological improvement may render an old design obsolete while providing a better way of accomplishing the same goals. Economic conditions may it impossible to maintain the system as intended, or may even make it impossible to finish building it. Political priorities may change either to eliminate the desire to do anything about what is really a fairly low-level environmental problem, or to demand even more stringent cleanup to levels that the constructed system cannot achieve. When the timeframe begins to approach a century, one has to even consider whether the federal government as we know it, much less an agency within that government, will even exist and have legal authority throughout the lifetime of the project.

I822-3

Lack of details

It's very hard to offer meaningful comment on a plan that is so scanty on details. We are told in general terms that there are numerous "source sites" to clean up, that some river banks will be hardened to prevent erosion, that some groundwater will be removed in some manner, reducing stream flows, and piped to an expanded treatment plant of some sort. We are told that there will be other opportunities for public input, that the plan will not affect mining jobs, and that this cleanup is necessary. What we are not told is "why" any of these assertions should be assumed true. There may be nothing false in any of those claims, but it's absurd to commit to a completely open ended ("50-90 years" is essentially "forever") plan without knowing exactly what that plan is. Boiling it all down, about all I can conclude is that the EPA wants permission to do a bunch of stuff that it will figure out later, in the general vicinity of the Silver Valley, for the next century or so, probably involving soil and/or water around. That's simply asking for way too much, both in political and engineering terms.

I822-4

I822-5

Lack of further formal input

Although we are told that there will be many opportunities for public input, none of these will be legally required or legally binding. Holding exactly one formal public hearing for

I822-6

Response to comment I822-2

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses risks to human health and the environment. The levels of contamination significantly exceed acceptable state and site-specific water quality 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 Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

Response to comment I822-3

See response I58-1. In addition EPA will use an adaptive management approach in implementing the Selected Remedy. Within the context of the Selected Remedy, adaptive management simply means that EPA will implement specific cleanup actions included in the remedy, monitor the effectiveness of those actions to determine whether remedial action objectives are being achieved, and make adjustments to future cleanup actions to benefit from the information gained through the effectiveness monitoring. These adjustments may also include the use of new technologies. If these adjustments require significant changes to the Selected Remedy, EPA will prepare a new decision document that will be submitted for public comment.

Response to comment I822-4

Sufficient information exists to support the Selected Remedy. However, insufficient information exists to fully characterize all the specific sources of metals contamination that affect the SFCDR, streams, and floodplains in some areas of the Upper Basin. The Proposed Plan did not include detailed information on site specific designs for this reason. Before the cleanup takes place, many pre-design activities will take place at specific sites. This pre-design information will support site specific designs and broader implementation planning for the site. This process is standard at complex Superfund cleanups. Collection of site-specific pre-design data is a central component of EPA's adaptive management

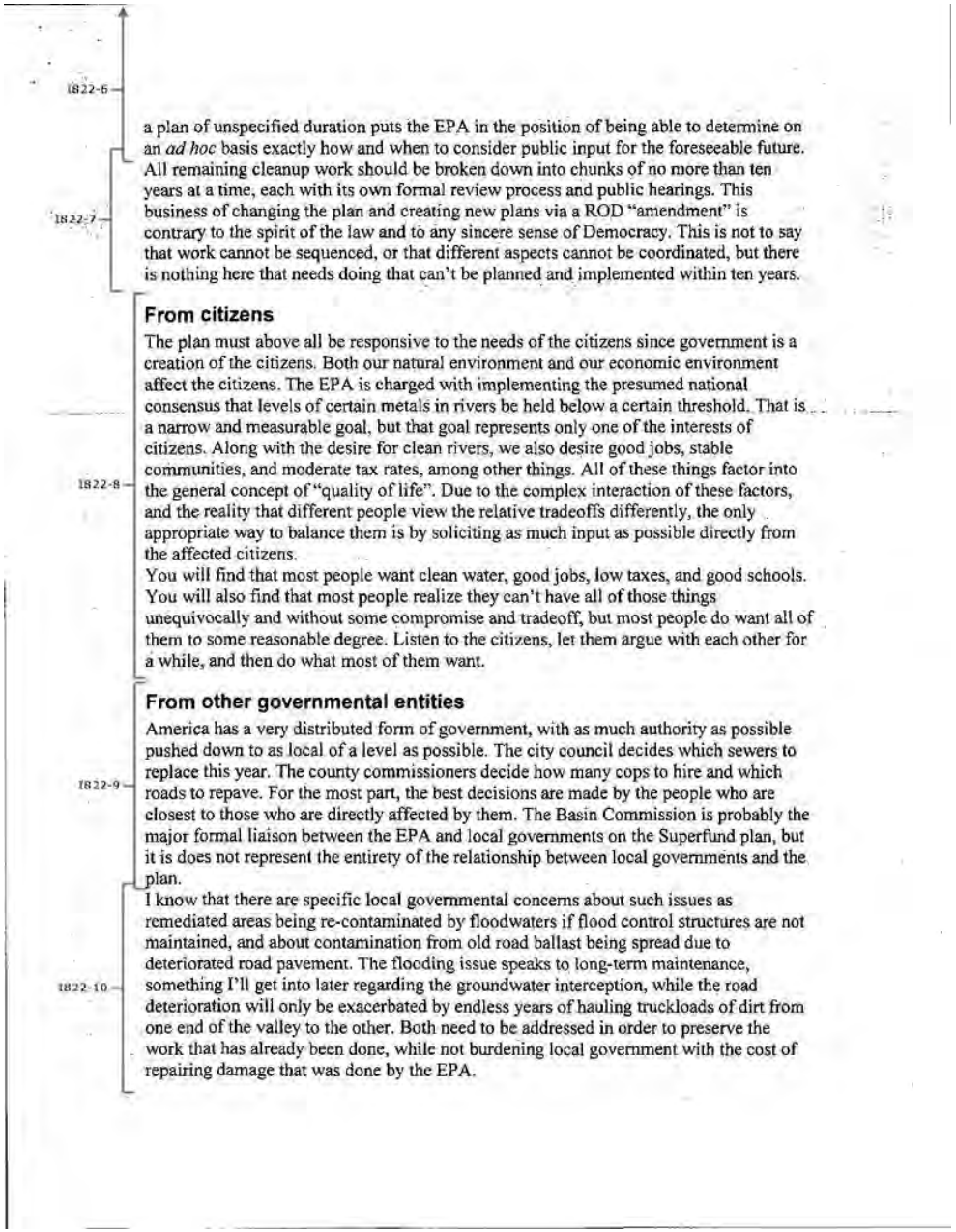
strategy. If the pre-design data indicate that an alternative remedial approach would be more appropriate or that no remedial actions are needed due to low site risks, than the cleanup plan will be modified to reflect those changes. The implementation process will be open and transparent, with regular opportunities for public input, as defined in the ROD Amendment.

Response to comment I822-5

See responses to Comment Nos. I58-1 and I58-4.

Response to comment I822-6

See response to Comment No. I295-2.



I822-6

a plan of unspecified duration puts the EPA in the position of being able to determine on an *ad hoc* basis exactly how and when to consider public input for the foreseeable future. All remaining cleanup work should be broken down into chunks of no more than ten years at a time, each with its own formal review process and public hearings. This business of changing the plan and creating new plans via a ROD "amendment" is contrary to the spirit of the law and to any sincere sense of Democracy. This is not to say that work cannot be sequenced, or that different aspects cannot be coordinated, but there is nothing here that needs doing that can't be planned and implemented within ten years.

I822-7

From citizens

The plan must above all be responsive to the needs of the citizens since government is a creation of the citizens. Both our natural environment and our economic environment affect the citizens. The EPA is charged with implementing the presumed national consensus that levels of certain metals in rivers be held below a certain threshold. That is a narrow and measurable goal, but that goal represents only one of the interests of citizens. Along with the desire for clean rivers, we also desire good jobs, stable communities, and moderate tax rates, among other things. All of these things factor into the general concept of "quality of life". Due to the complex interaction of these factors, and the reality that different people view the relative tradeoffs differently, the only appropriate way to balance them is by soliciting as much input as possible directly from the affected citizens.

I822-8

You will find that most people want clean water, good jobs, low taxes, and good schools. You will also find that most people realize they can't have all of those things unequivocally and without some compromise and tradeoff, but most people do want all of them to some reasonable degree. Listen to the citizens, let them argue with each other for a while, and then do what most of them want.

From other governmental entities

I822-9

America has a very distributed form of government, with as much authority as possible pushed down to as local of a level as possible. The city council decides which sewers to replace this year. The county commissioners decide how many cops to hire and which roads to repave. For the most part, the best decisions are made by the people who are closest to those who are directly affected by them. The Basin Commission is probably the major formal liaison between the EPA and local governments on the Superfund plan, but it is does not represent the entirety of the relationship between local governments and the plan.

I822-10

I know that there are specific local governmental concerns about such issues as remediated areas being re-contaminated by floodwaters if flood control structures are not maintained, and about contamination from old road ballast being spread due to deteriorated road pavement. The flooding issue speaks to long-term maintenance, something I'll get into later regarding the groundwater interception, while the road deterioration will only be exacerbated by endless years of hauling truckloads of dirt from one end of the valley to the other. Both need to be addressed in order to preserve the work that has already been done, while not burdening local government with the cost of repairing damage that was done by the EPA.

Response to comment I822-7

The remedy selection process was conducted in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. Also see response to Comment No. I58-4.

Response to comment I822-8

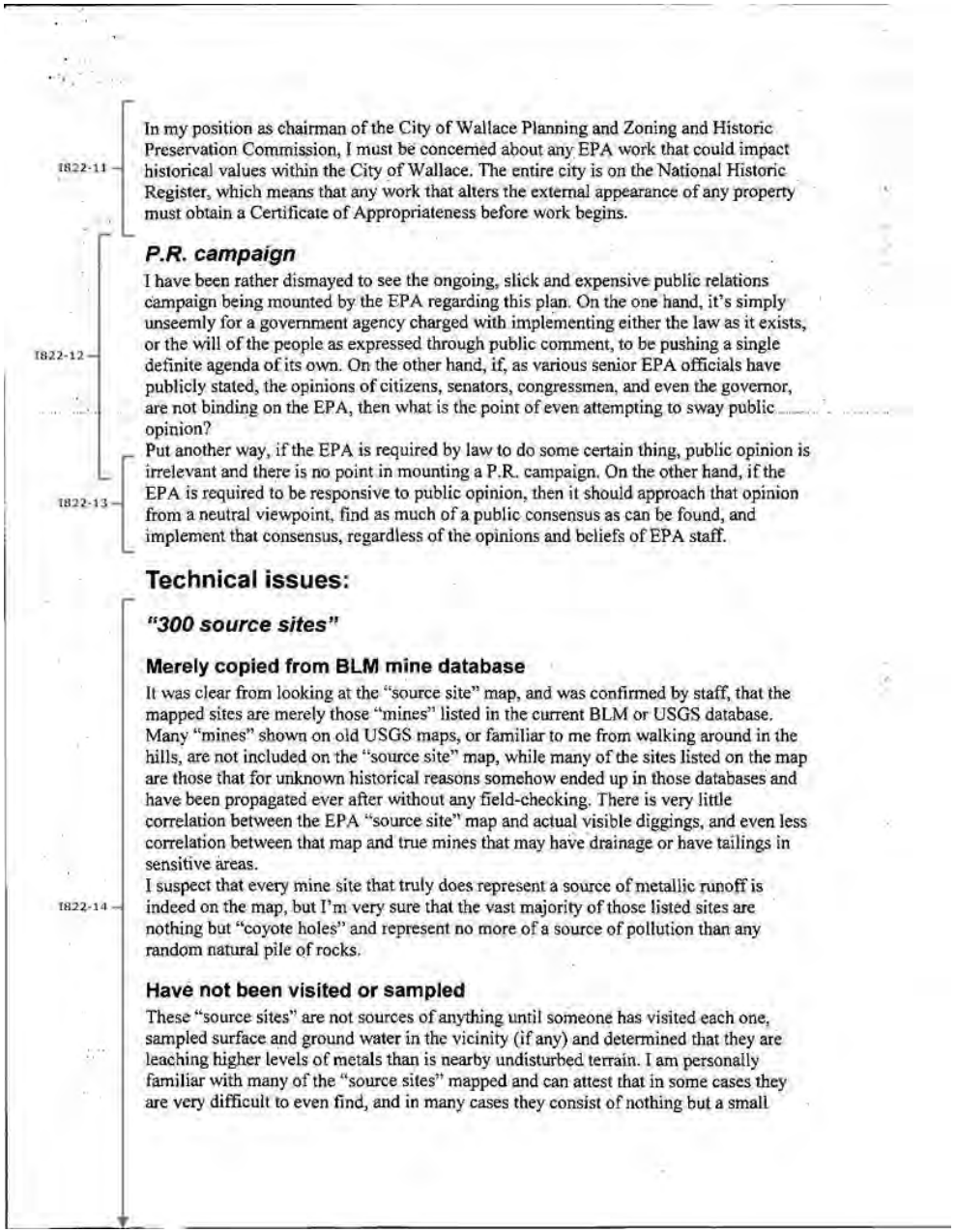
Comment noted. EPA is committed to being as responsive as possible to the concerns of the community, within the limits of the law. However, EPA is charged with addressing unacceptable risks to human health and the environment, such as exist in the Upper Basin. The surface water quality standards that will be used as cleanup levels for the Selected Remedy are not based on Federal standards, but rather site-specific standards developed by the State of Idaho, specifically for the South Fork of the Coeur d'Alene River. These site-specific standards were developed by consideration of background metals levels in the area as well as toxicity to aquatic life. Also see response to Comment No. I295-2.

Response to comment I822-9

Comment noted.

Response to comment I822-10

EPA cost estimates for the Selected Remedy include necessary repairs to roads, remedy protection features, etc. that occur as a result of implementing and maintaining remedies.



I822-11 In my position as chairman of the City of Wallace Planning and Zoning and Historic Preservation Commission, I must be concerned about any EPA work that could impact historical values within the City of Wallace. The entire city is on the National Historic Register, which means that any work that alters the external appearance of any property must obtain a Certificate of Appropriateness before work begins.

P.R. campaign

I822-12 I have been rather dismayed to see the ongoing, slick and expensive public relations campaign being mounted by the EPA regarding this plan. On the one hand, it's simply unseemly for a government agency charged with implementing either the law as it exists, or the will of the people as expressed through public comment, to be pushing a single definite agenda of its own. On the other hand, if, as various senior EPA officials have publicly stated, the opinions of citizens, senators, congressmen, and even the governor, are not binding on the EPA, then what is the point of even attempting to sway public opinion?

I822-13 Put another way, if the EPA is required by law to do some certain thing, public opinion is irrelevant and there is no point in mounting a P.R. campaign. On the other hand, if the EPA is required to be responsive to public opinion, then it should approach that opinion from a neutral viewpoint, find as much of a public consensus as can be found, and implement that consensus, regardless of the opinions and beliefs of EPA staff.

Technical issues:

"300 source sites"

Merely copied from BLM mine database

I822-14 It was clear from looking at the "source site" map, and was confirmed by staff, that the mapped sites are merely those "mines" listed in the current BLM or USGS database. Many "mines" shown on old USGS maps, or familiar to me from walking around in the hills, are not included on the "source site" map, while many of the sites listed on the map are those that for unknown historical reasons somehow ended up in those databases and have been propagated ever after without any field-checking. There is very little correlation between the EPA "source site" map and actual visible diggings, and even less correlation between that map and true mines that may have drainage or have tailings in sensitive areas.

I suspect that every mine site that truly does represent a source of metallic runoff is indeed on the map, but I'm very sure that the vast majority of those listed sites are nothing but "coyote holes" and represent no more of a source of pollution than any random natural pile of rocks.

Have not been visited or sampled

These "source sites" are not sources of anything until someone has visited each one, sampled surface and ground water in the vicinity (if any) and determined that they are leaching higher levels of metals than is nearby undisturbed terrain. I am personally familiar with many of the "source sites" mapped and can attest that in some cases they are very difficult to even find, and in many cases they consist of nothing but a small

Response to comment I822-11

EPA respects the history and historical landmarks of the Silver Valley, and will carry out the Selected Remedy consistent with the substantive requirements of the National Historic Preservation Act, as indicated in the final ROD Amendment, Part 2, Section 13.2 and Table 13-2.

Response to comment I822-12

EPA conducted a great deal of community outreach in 2010 related to the proposed plan. Many people had expressed concerns about the complexity of the plan and the size and readability of the documents. Plus, much information was circulating about the plan, some of it factually incorrect. EPA responded with an education effort. EPA sought to address common questions, clarify issues, provide factual information, and encourage people to review the plan and submit comments. EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. The input EPA has received has been instrumental in the changes made to the Upper Basin cleanup plan since the Proposed Plan was issued, resulting in the Selected Remedy. The ongoing involvement of the community will be an important part of the cleanup as it moves forward.

Response to comment I822-13

EPA is required under CERCLA to address unacceptable risks to human health and the environment. Regarding EPA's efforts to be responsive to public opinion, see response to Comment No. I295-2.

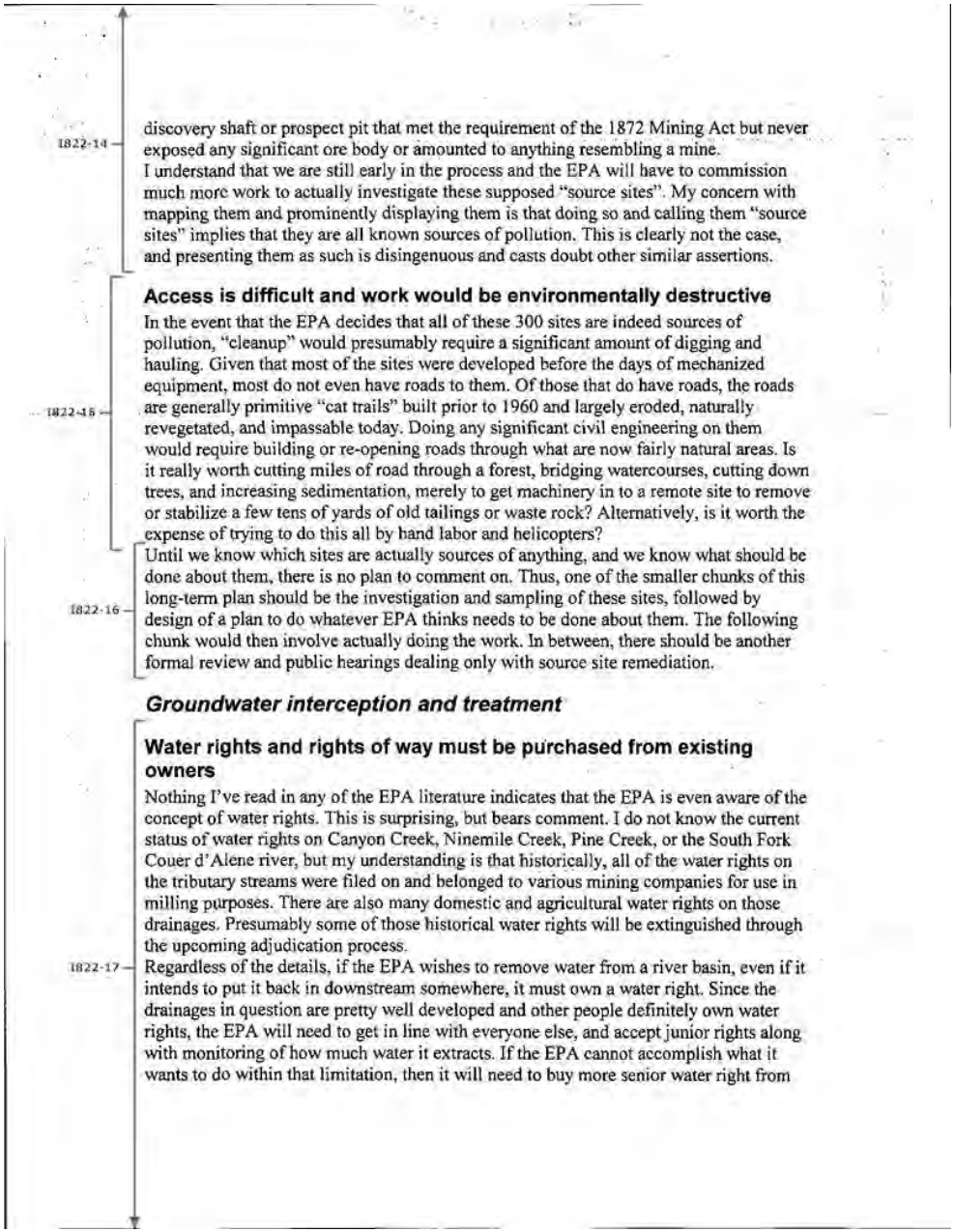
Response to comment I822-14

Due in part to extensive public concern about the duration and cost of cleanup, EPA has decided to significantly reduce the scope of the Selected Remedy by prioritizing the remedial actions that were presented as EPA's Preferred Alternative in the Proposed Plan. The Upper Basin Selected Remedy is an interim remedy which identifies the priority remedial actions that are expected to provide the greatest reduction of contamination in the SFCDR and its tributaries and protection of in-place human health barriers in local communities. EPA reduced the scope of Alternative 3+ in the Preferred Alternative for OU 3 from 345 to 145 mine and mill sites included in the Selected Remedy. The total

estimated cost of the Selected Remedy as presented in the ROD Amendment is $635 million, a significant reduction from the $1.3 billion estimate for the Preferred Alternative identified in the Proposed Plan.

With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT, EPA has developed a logical and transparent prioritization process over the past two years. EPA used this prioritization process to reduce the scope of the Selected Remedy as compared to the Preferred Alternative. A site-by-site review was conducted to identify the highest priority sites for remedial action and, thus, those that are included in the Selected Remedy. The Upper Basin PFT provided input to assist EPA in prioritizing actions to include in the Selected Remedy. This site-by-site review is described in detail in the FFS Report (EPA, August 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). Key considerations for this review included: (1) prior remedial actions and effectiveness of those actions; (2) active land uses; (3) potential human health risks; (4) downstream water quality; (5) site-specific data such as location, contaminant concentrations, riparian acreage, and erosion potential; and (6) access road requirements.

EPA conducted a sampling program at 51 of the 348 sites in the Preferred Alternative in the summer of 2011 to support the prioritization process. The purpose of the sampling program was to gather information and data with which to reduce the number of sites included in EPA's Preferred Alternative in the Upper Basin Proposed Plan. The results of the 2011 sampling program for selected mine and mill sites in the Upper Basin indicated that 42 sites of the 51 sites and their associated remedial actions could be removed from those included in the Selected Remedy documented in the ROD Amendment for the Upper Basin. EPA will continue to evaluate select sites to determine whether the site will be removed from further consideration for remedial action or retained for implementation of remedial actions as part of the Selected Remedy for the Upper Basin.



I822-14 discovery shaft or prospect pit that met the requirement of the 1872 Mining Act but never exposed any significant ore body or amounted to anything resembling a mine. I understand that we are still early in the process and the EPA will have to commission much more work to actually investigate these supposed "source sites". My concern with mapping them and prominently displaying them is that doing so and calling them "source sites" implies that they are all known sources of pollution. This is clearly not the case, and presenting them as such is disingenuous and casts doubt other similar assertions.

Access is difficult and work would be environmentally destructive

I822-15 In the event that the EPA decides that all of these 300 sites are indeed sources of pollution, "cleanup" would presumably require a significant amount of digging and hauling. Given that most of the sites were developed before the days of mechanized equipment, most do not even have roads to them. Of those that do have roads, the roads are generally primitive "cat trails" built prior to 1960 and largely eroded, naturally revegetated, and impassable today. Doing any significant civil engineering on them would require building or re-opening roads through what are now fairly natural areas. Is it really worth cutting miles of road through a forest, bridging watercourses, cutting down trees, and increasing sedimentation, merely to get machinery in to a remote site to remove or stabilize a few tens of yards of old tailings or waste rock? Alternatively, is it worth the expense of trying to do this all by hand labor and helicopters?

I822-16 Until we know which sites are actually sources of anything, and we know what should be done about them, there is no plan to comment on. Thus, one of the smaller chunks of this long-term plan should be the investigation and sampling of these sites, followed by design of a plan to do whatever EPA thinks needs to be done about them. The following chunk would then involve actually doing the work. In between, there should be another formal review and public hearings dealing only with source site remediation.

Groundwater interception and treatment

Water rights and rights of way must be purchased from existing owners

Nothing I've read in any of the EPA literature indicates that the EPA is even aware of the concept of water rights. This is surprising, but bears comment. I do not know the current status of water rights on Canyon Creek, Ninemile Creek, Pine Creek, or the South Fork Couer d'Alene river, but my understanding is that historically, all of the water rights on the tributary streams were filed on and belonged to various mining companies for use in milling purposes. There are also many domestic and agricultural water rights on those drainages. Presumably some of those historical water rights will be extinguished through the upcoming adjudication process.

I822-17 Regardless of the details, if the EPA wishes to remove water from a river basin, even if it intends to put it back in downstream somewhere, it must own a water right. Since the drainages in question are pretty well developed and other people definitely own water rights, the EPA will need to get in line with everyone else, and accept junior rights along with monitoring of how much water it extracts. If the EPA cannot accomplish what it wants to do within that limitation, then it will need to buy more senior water right from

Response to comment I822-15

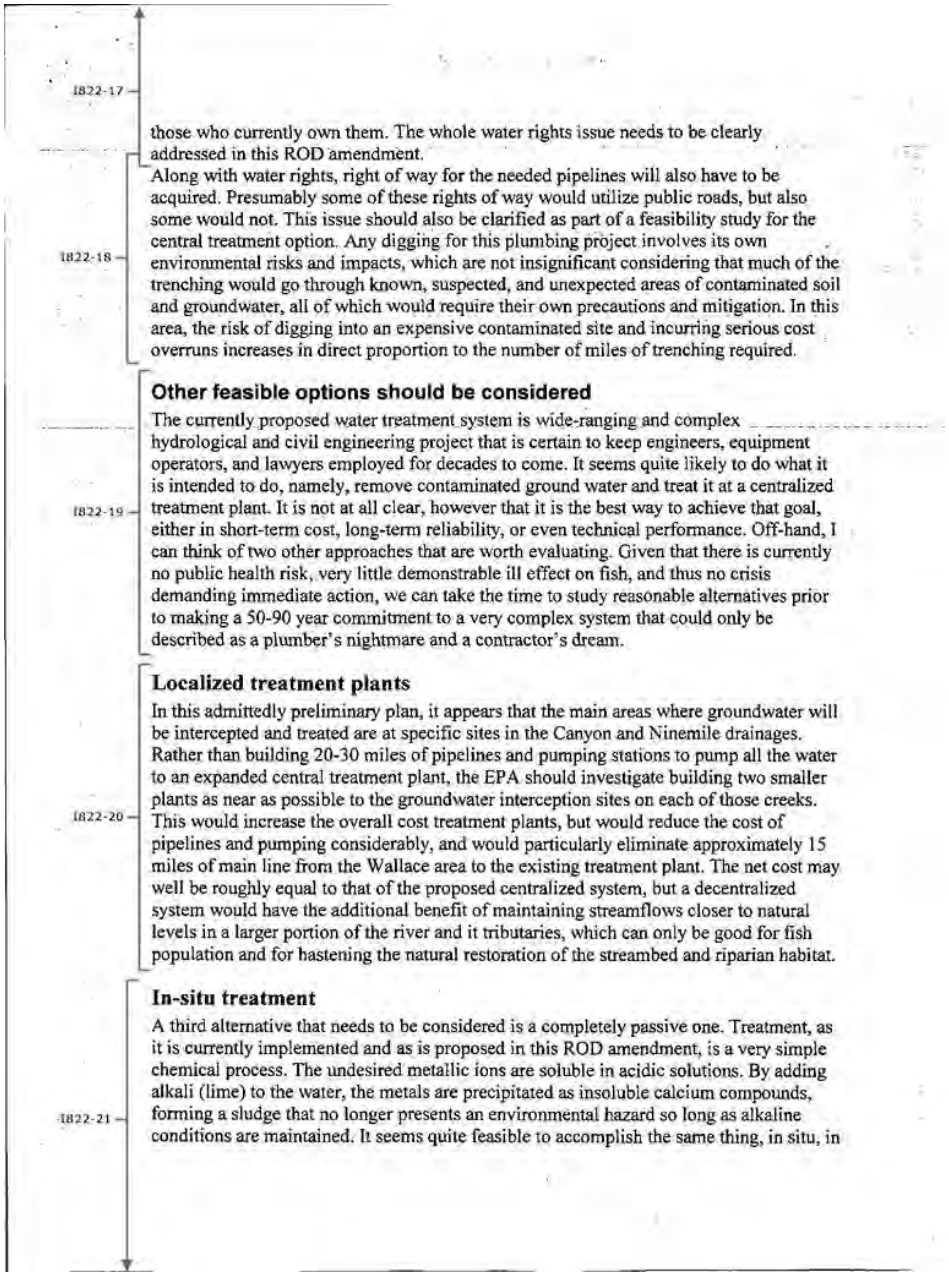
As described in the ROD Amendment, Part 2, Section 14, the Selected Remedy has been significantly reduced in scope from that of the Preferred Alternative in the Proposed Plan. Consequently, significantly fewer sources in remote areas will need to be accessed. Those sources which will need to be accessed in remote locations have been determined to be sufficiently significant to require remediation. EPA will seek to minimize damage to the environment in accessing them. Final details regarding access will be determined during design.

Response to comment I822-16

As noted in the ROD Amendment, Section 14, The Selected Remedy contains significant changes from EPA's Preferred Alternative identified in the Upper Basin Proposed Plan (EPA, 2010, *Proposed Plan, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). These changes affect the remedial actions included in the Selected Remedy. No changes have been made to the remedy protection actions as identified in the Proposed Plan. In response to stakeholder and public comments, EPA has reduced the scope of the Selected Remedy and focused on prioritized actions that will be implemented over about a 30-year time frame. See response to Comment No. I58-1.

Response to comment I822-17

As it implements the Selected Remedy EPA intends to satisfy State water law as required by CERCLA. EPA does not believe implementation of the Selected Remedy will interference with any existing water rights. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.



I822-17

those who currently own them. The whole water rights issue needs to be clearly addressed in this ROD amendment.

Along with water rights, right of way for the needed pipelines will also have to be acquired. Presumably some of these rights of way would utilize public roads, but also some would not. This issue should also be clarified as part of a feasibility study for the central treatment option. Any digging for this plumbing project involves its own

I822-18

environmental risks and impacts, which are not insignificant considering that much of the trenching would go through known, suspected, and unexpected areas of contaminated soil and groundwater, all of which would require their own precautions and mitigation. In this area, the risk of digging into an expensive contaminated site and incurring serious cost overruns increases in direct proportion to the number of miles of trenching required.

Other feasible options should be considered

The currently proposed water treatment system is wide-ranging and complex hydrological and civil engineering project that is certain to keep engineers, equipment operators, and lawyers employed for decades to come. It seems quite likely to do what it is intended to do, namely, remove contaminated ground water and treat it at a centralized

I822-19

treatment plant. It is not at all clear, however that it is the best way to achieve that goal, either in short-term cost, long-term reliability, or even technical performance. Off-hand, I can think of two other approaches that are worth evaluating. Given that there is currently no public health risk, very little demonstrable ill effect on fish, and thus no crisis demanding immediate action, we can take the time to study reasonable alternatives prior to making a 50-90 year commitment to a very complex system that could only be described as a plumber's nightmare and a contractor's dream.

Localized treatment plants

In this admittedly preliminary plan, it appears that the main areas where groundwater will be intercepted and treated are at specific sites in the Canyon and Ninemile drainages. Rather than building 20-30 miles of pipelines and pumping stations to pump all the water to an expanded central treatment plant, the EPA should investigate building two smaller plants as near as possible to the groundwater interception sites on each of those creeks.

I822-20

This would increase the overall cost treatment plants, but would reduce the cost of pipelines and pumping considerably, and would particularly eliminate approximately 15 miles of main line from the Wallace area to the existing treatment plant. The net cost may well be roughly equal to that of the proposed centralized system, but a decentralized system would have the additional benefit of maintaining streamflows closer to natural levels in a larger portion of the river and it tributaries, which can only be good for fish population and for hastening the natural restoration of the streambed and riparian habitat.

In-situ treatment

A third alternative that needs to be considered is a completely passive one. Treatment, as it is currently implemented and as is proposed in this ROD amendment, is a very simple chemical process. The undesired metallic ions are soluble in acidic solutions. By adding alkali (lime) to the water, the metals are precipitated as insoluble calcium compounds,

I822-21

forming a sludge that no longer presents an environmental hazard so long as alkaline conditions are maintained. It seems quite feasible to accomplish the same thing, in situ, in

Response to comment I822-18

See response to Comment No. I248-1.

Response to comment I822-19

Other feasible water treatment options were considered during the Focused Feasibility Study (EPA, August 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*), including onsite, semi-passive systems rather than centralized active treatment. The Selected Remedy includes a combination of both of these approaches. The fact that the Central Treatment Plant already exists and would only need to be expanded to accommodate additional flows and updated to achieve current discharge standards makes it a relatively low cost option for treatment of contaminated waters that are located near the projected pipeline location. The risks to aquatic life from contaminated surface water are real. Approximately 20 miles of the South Fork and 13 miles of its tributaries are unable to sustain reproducing fish populations. Some areas are essentially devoid of fish and other aquatic life in the area of the mining impacts. Impacted species include the native bull trout, which is listed as "threatened" under the Endangered Species Act.

Response to comment I822-20

There are no planned groundwater collection actions in the Ninemile Creek drainage. Groundwater collection actions will be implemented at Woodland Park in Canyon Creek, Osburn, and the Box. The groundwater action in the Box will require pumping a short distance to the Central Treatment Plant (CTP), as the collection drain will be located at an elevation slightly below that of the CTP. Groundwater collected from Osburn and Woodland Park will be conveyed via gravity pipelines; no pumping will be required. EPA did evaluate building an additional active treatment plant in the Woodland Park area (*Draft Remedial Component Screening for the Woodland Park Area of Canyon Creek*, CH2M HILL, August 2007). This option was shown to be considerable more expensive than building a pipeline to the existing CTP. Some localized treatment plants will be built to address adit discharges in more remote locations. However, water

sources requiring treatment that are located near the project pipeline location will be treated at a lower cost at the CTP.

Response to comment I822-21

See response to Comment No. I899-7.

the case of slowly-moving groundwater, by merely allowing that water to flow through a bed of crushed limestone or other calcareous material.

It's not my aim to design such a system in detail here, but I would encourage the EPA to commission a paper feasibility study, and a small-scale pilot project to test this idea. The design would essentially consist of an interception trench perpendicular to the flow of ground water and extending past the edges of the contaminated part of that flow, with the trench being filled with crushed limestone and covered with geotextile and impermeable fill. The trenching involved would be the same as would be needed to construct infiltration galleries under the active treatment alternatives, but rather than installing a perforated pipe and drain rock in the trench, the crushed limestone would be used. Simple sampling wells, or more elaborate automated analysis and telemetry systems could be included to verify performance of this system. I mention limestone here as a possible material to use, but it's quite possible that something better would be identified in the feasibility study. The key properties of the material are that it be capable of removing zinc and lead ions from water, either by chemical precipitation or adsorption, that it be environmentally benign, and that it be readily available at low cost. Lime, either as the natural stone (carbonate) or as slaked lime clinkers (hydroxide) both have potential for this purpose. Perhaps magnesia or dolomite (calcium-magnesium limestone) would be better. The important thing is to consider a passive approach that traps metals in place without resorting to elaborate plumbing and mechanical systems.

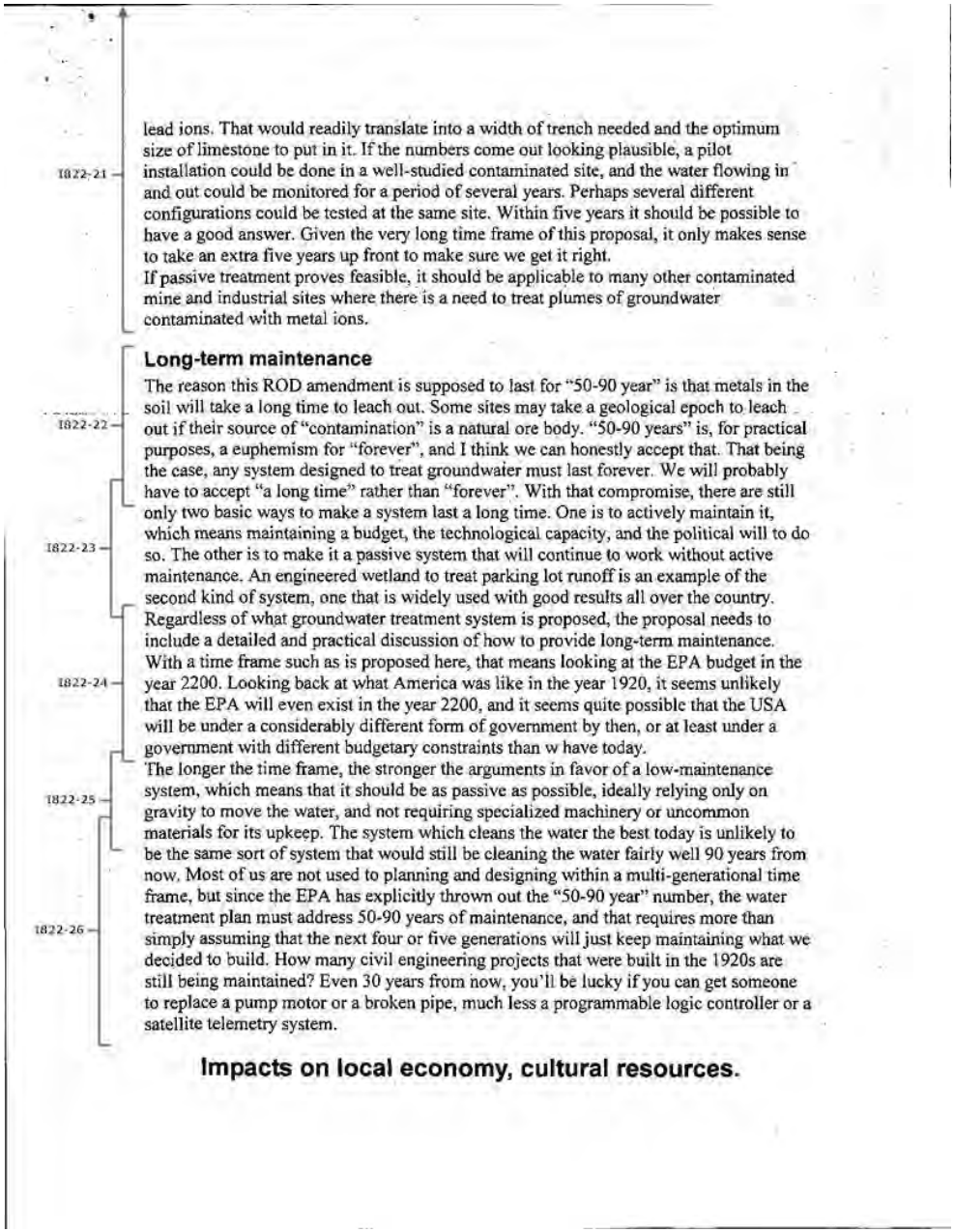
The advantages of in-situ treatment include much lower first cost and maintenance cost, no ground disturbance other than the interception trench itself, No rights of way or water rights need be acquired, and perhaps most importantly, a system that could honestly
I822-21 continue to operate for 50-90 years regardless of changes in government priorities or even the very existence of government.

The disadvantages are that treatment may be imperfect and the water flowing past the limestone bed might be considered a "discharge" of a "pollutant" for regulatory purposes, and that the precipitated metals would remain in the ground within the limestone bed. The first concern is one I will leave for the regulators and lawyers to sort out, if it's even an issue at all. The second can be dealt with, if deemed necessary, by digging out the precipitated metals and replacing the limestone periodically. Since something similar must be done with the sludge from the conventional treatment plant, this should not be any more difficult or expensive. If, on the other hand, 50 or 90 years from now people stop maintaining the system for whatever reason, the passive filtration bed will continue to serve, albeit imperfectly, for a long time, whereas the active treatment system will be utterly inoperative and will provide no benefit at all.

A plan that's as long-range as what the EPA is currently proposing must consider the likelihood that at some point in the future, for any number of reasons, people may stop implementing the plan or maintaining the infrastructure. That argues for simple, passive systems whenever possible rather than complex, over-engineered constructions that may well become impossible or too expensive to maintain in the future.

I urge the EPA to study passive in-situ treatment, along the lines of what I've suggested, before committing to a massive and complicated scheme to re-plumb most of the valley. It shouldn't be hard to come up with computer models that would allow one to calculate roughly the tonnage and particle size of limestone or other material, and the contact time needed to treat a certain flow rate of water containing a certain concentration of zinc and

No comments



lead ions. That would readily translate into a width of trench needed and the optimum size of limestone to put in it. If the numbers come out looking plausible, a pilot
I822-21 installation could be done in a well-studied contaminated site, and the water flowing in and out could be monitored for a period of several years. Perhaps several different configurations could be tested at the same site. Within five years it should be possible to have a good answer. Given the very long time frame of this proposal, it only makes sense to take an extra five years up front to make sure we get it right.
If passive treatment proves feasible, it should be applicable to many other contaminated mine and industrial sites where there is a need to treat plumes of groundwater contaminated with metal ions.

Long-term maintenance

The reason this ROD amendment is supposed to last for "50-90 year" is that metals in the soil will take a long time to leach out. Some sites may take a geological epoch to leach
I822-22 out if their source of "contamination" is a natural ore body. "50-90 years" is, for practical purposes, a euphemism for "forever", and I think we can honestly accept that. That being the case, any system designed to treat groundwater must last forever. We will probably have to accept "a long time" rather than "forever". With that compromise, there are still
I822-23 only two basic ways to make a system last a long time. One is to actively maintain it, which means maintaining a budget, the technological capacity, and the political will to do so. The other is to make it a passive system that will continue to work without active maintenance. An engineered wetland to treat parking lot runoff is an example of the second kind of system, one that is widely used with good results all over the country.
Regardless of what groundwater treatment system is proposed, the proposal needs to include a detailed and practical discussion of how to provide long-term maintenance.
With a time frame such as is proposed here, that means looking at the EPA budget in the
I822-24 year 2200. Looking back at what America was like in the year 1920, it seems unlikely that the EPA will even exist in the year 2200, and it seems quite possible that the USA will be under a considerably different form of government by then, or at least under a government with different budgetary constraints than w have today.
The longer the time frame, the stronger the arguments in favor of a low-maintenance
I822-25 system, which means that it should be as passive as possible, ideally relying only on gravity to move the water, and not requiring specialized machinery or uncommon materials for its upkeep. The system which cleans the water the best today is unlikely to be the same sort of system that would still be cleaning the water fairly well 90 years from now. Most of us are not used to planning and designing within a multi-generational time frame, but since the EPA has explicitly thrown out the "50-90 year" number, the water
I822-26 treatment plan must address 50-90 years of maintenance, and that requires more than simply assuming that the next four or five generations will just keep maintaining what we decided to build. How many civil engineering projects that were built in the 1920s are still being maintained? Even 30 years from now, you'll be lucky if you can get someone to replace a pump motor or a broken pipe, much less a programmable logic controller or a satellite telemetry system.

Impacts on local economy, cultural resources.

Response to comment I822-22

See response to Comment No. I58-1.

Response to comment I822-23

EPA cost estimates include the cost of operation and maintenance. Regarding passive systems, onsite, semi-passive water treatment is one component of the Selected Remedy and will be used to treat adit discharges in locations where it is the least costly treatment option. This generally applies to more remote sites that are located further from Interstate-90, where the main pipeline to the CTP will be installed. The term semi-passive is used rather than "passive" because in order to maintain effectiveness over time, even passive systems will periodic require maintenance. All passive systems will eventually fail if maintenance is ceased. The semi-passive technologies included in the Selected Remedy are lime addition with settling ponds and sulfate reducing bioreactors. Additional information on these technologies can be found in the Focused Feasibility Study.

Response to comment I822-24

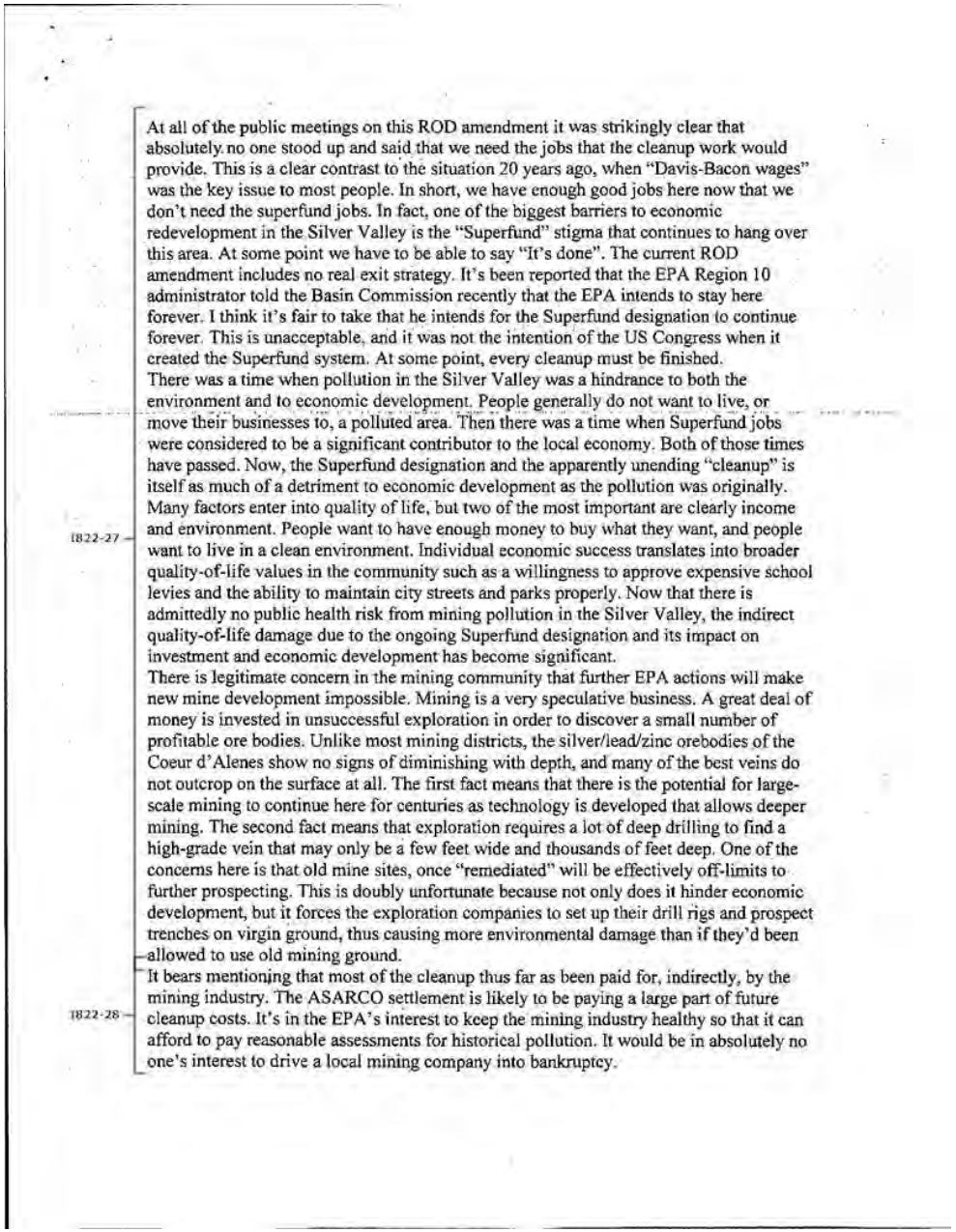
See response to Comment No. I58-2.

Response to comment I822-25

See response to comment I899-7.

Response to comment I822-26

As described in the ROD Amendment, the Selected Remedy is an interim remedy of prioritized actions to be implemented over about 30 years. Cost estimates have considered the need for long term operation and maintenance of remedial facilities as well as their replacement. Future decisions will need to be made regarding the continued need for certain facilities as well as additional facilities, if warranted. Such decisions will need to consider evolving improvements in available technologies over time.



At all of the public meetings on this ROD amendment it was strikingly clear that absolutely no one stood up and said that we need the jobs that the cleanup work would provide. This is a clear contrast to the situation 20 years ago, when "Davis-Bacon wages" was the key issue to most people. In short, we have enough good jobs here now that we don't need the superfund jobs. In fact, one of the biggest barriers to economic redevelopment in the Silver Valley is the "Superfund" stigma that continues to hang over this area. At some point we have to be able to say "It's done". The current ROD amendment includes no real exit strategy. It's been reported that the EPA Region 10 administrator told the Basin Commission recently that the EPA intends to stay here forever. I think it's fair to take that he intends for the Superfund designation to continue forever. This is unacceptable, and it was not the intention of the US Congress when it created the Superfund system. At some point, every cleanup must be finished.

There was a time when pollution in the Silver Valley was a hindrance to both the environment and to economic development. People generally do not want to live, or move their businesses to, a polluted area. Then there was a time when Superfund jobs were considered to be a significant contributor to the local economy. Both of those times have passed. Now, the Superfund designation and the apparently unending "cleanup" is itself as much of a detriment to economic development as the pollution was originally.

I822-27 Many factors enter into quality of life, but two of the most important are clearly income and environment. People want to have enough money to buy what they want, and people want to live in a clean environment. Individual economic success translates into broader quality-of-life values in the community such as a willingness to approve expensive school levies and the ability to maintain city streets and parks properly. Now that there is admittedly no public health risk from mining pollution in the Silver Valley, the indirect quality-of-life damage due to the ongoing Superfund designation and its impact on investment and economic development has become significant.

There is legitimate concern in the mining community that further EPA actions will make new mine development impossible. Mining is a very speculative business. A great deal of money is invested in unsuccessful exploration in order to discover a small number of profitable ore bodies. Unlike most mining districts, the silver/lead/zinc orebodies of the Coeur d'Alenes show no signs of diminishing with depth, and many of the best veins do not outcrop on the surface at all. The first fact means that there is the potential for large-scale mining to continue here for centuries as technology is developed that allows deeper mining. The second fact means that exploration requires a lot of deep drilling to find a high-grade vein that may only be a few feet wide and thousands of feet deep. One of the concerns here is that old mine sites, once "remediated" will be effectively off-limits to further prospecting. This is doubly unfortunate because not only does it hinder economic development, but it forces the exploration companies to set up their drill rigs and prospect trenches on virgin ground, thus causing more environmental damage than if they'd been allowed to use old mining ground.

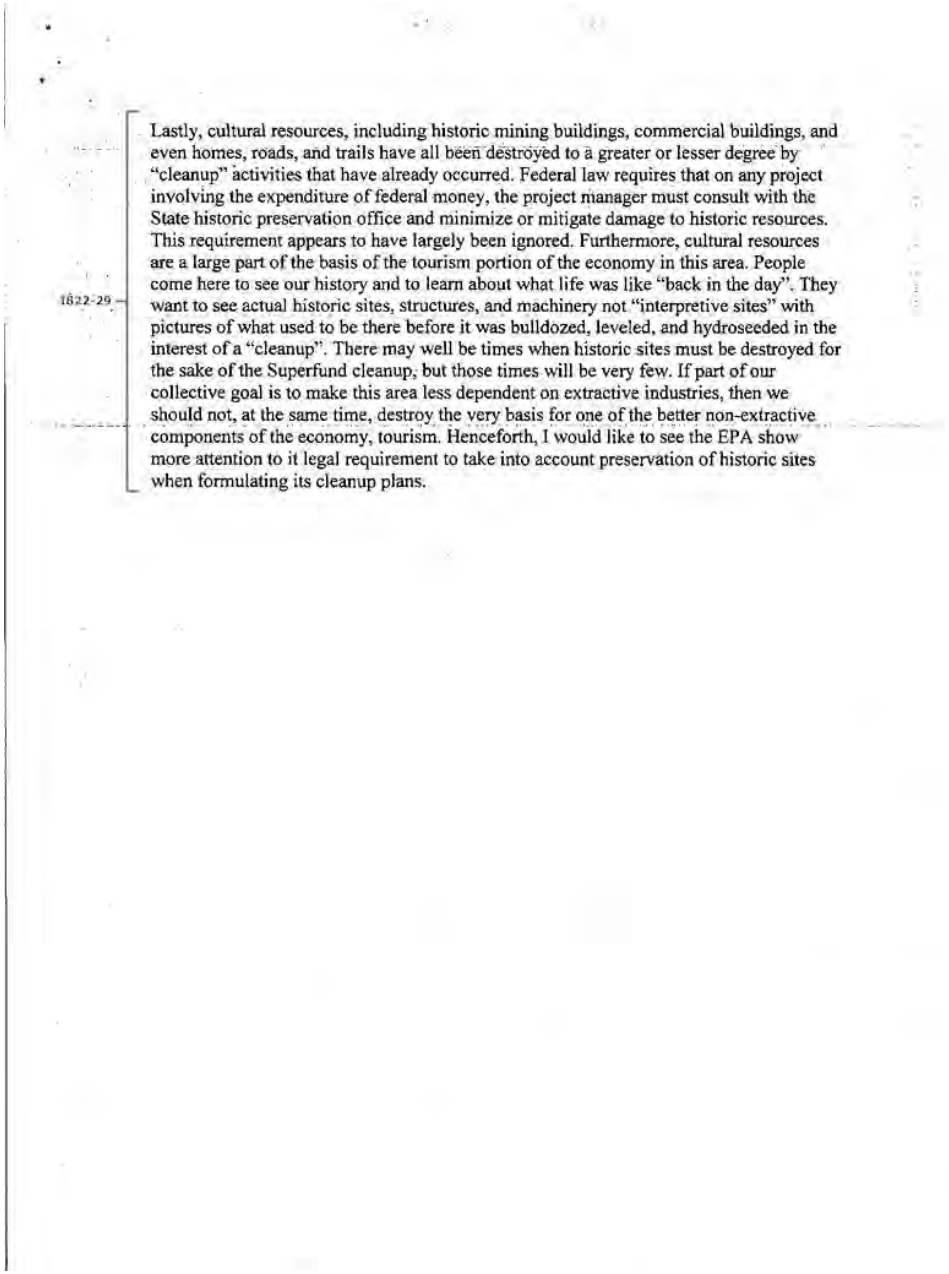
I822-28 It bears mentioning that most of the cleanup thus far as been paid for, indirectly, by the mining industry. The ASARCO settlement is likely to be paying a large part of future cleanup costs. It's in the EPA's interest to keep the mining industry healthy so that it can afford to pay reasonable assessments for historical pollution. It would be in absolutely no one's interest to drive a local mining company into bankruptcy.

Response to comment I822-27

Regarding issue of a potential "Superfund stigma" see the ROD Amendment, Part 3, Section 3.10.2. The Upper Basin is large and the contamination is extensive. Consequently, it is impossible to predict exactly how the entire Upper Basin environmental system will respond to specific cleanup actions. This is why a critical component of the Selected Remedy is adaptive management. As cleanup actions are implemented, they will be evaluated for their effectiveness and future cleanup actions will be adjusted based on lessons learned. Regarding impacts to the local economy, see Comment No. I474-1. Regarding the relationship between cleanup and mining activities see response to Comment No. I58-5.

Response to comment I822-28

See responses to Comment Nos. I58-2 and I58-5.



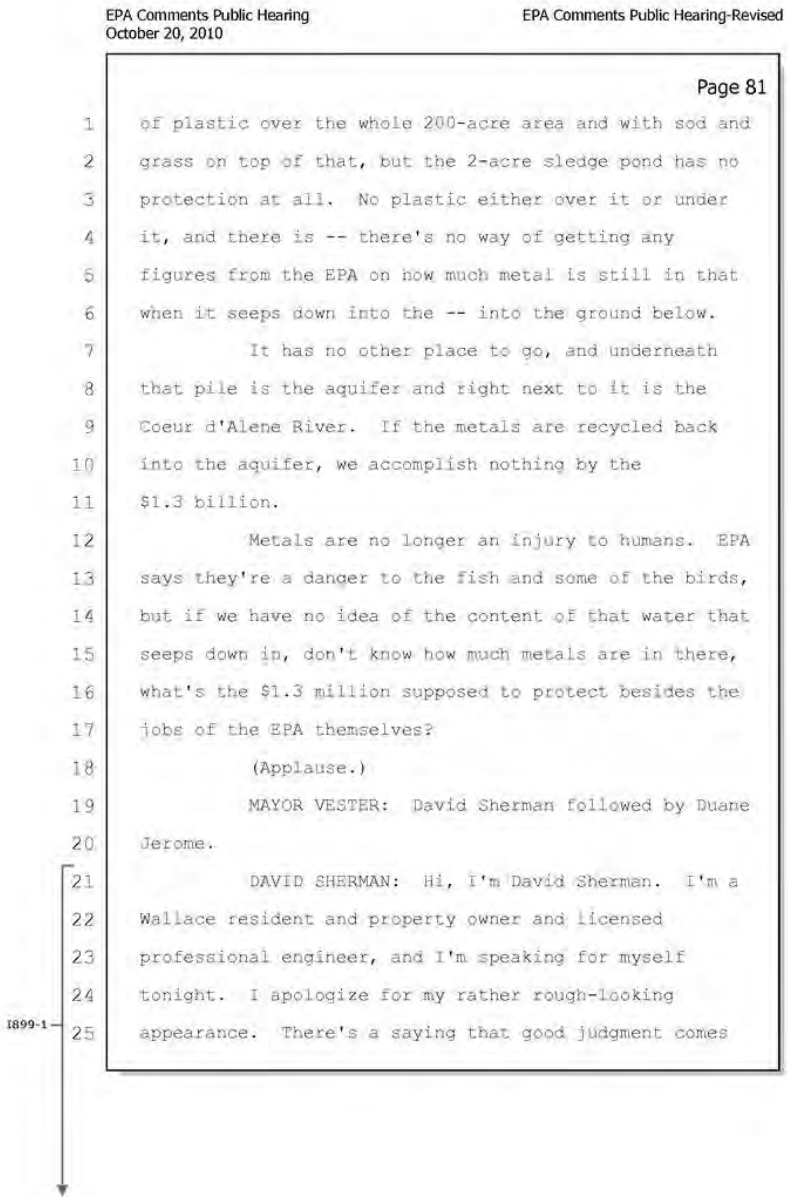
Lastly, cultural resources, including historic mining buildings, commercial buildings, and even homes, roads, and trails have all been destroyed to a greater or lesser degree by "cleanup" activities that have already occurred. Federal law requires that on any project involving the expenditure of federal money, the project manager must consult with the State historic preservation office and minimize or mitigate damage to historic resources. This requirement appears to have largely been ignored. Furthermore, cultural resources are a large part of the basis of the tourism portion of the economy in this area. People come here to see our history and to learn about what life was like "back in the day". They want to see actual historic sites, structures, and machinery not "interpretive sites" with pictures of what used to be there before it was bulldozed, leveled, and hydroseeded in the interest of a "cleanup". There may well be times when historic sites must be destroyed for the sake of the Superfund cleanup, but those times will be very few. If part of our collective goal is to make this area less dependent on extractive industries, then we should not, at the same time, destroy the very basis for one of the better non-extractive components of the economy, tourism. Henceforth, I would like to see the EPA show more attention to it legal requirement to take into account preservation of historic sites when formulating its cleanup plans.

I822-29

Response to comment I822-29

Comment noted. EPA respects the history and historical landmarks of the Silver Valley and has regularly consulted with both State and Tribal Historic Preservation Officers as part of planning for cleanup activities to be implemented within the Site. EPA will continue to carry out the Selected Remedy consistent with the substantive requirements of the National Historic Preservation Act, as indicated in the final ROD Amendment, Part 2, Section 13.2 and Table 13-2.

Sherman, David, I899, Letter 619651-34



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of plastic over the whole 200-acre area and with sod and grass on top of that, but the 2-acre sledge pond has no protection at all. No plastic either over it or under it, and there is -- there's no way of getting any figures from the EPA on how much metal is still in that when it seeps down into the -- into the ground below.

It has no other place to go, and underneath that pile is the aquifer and right next to it is the Coeur d'Alene River. If the metals are recycled back into the aquifer, we accomplish nothing by the $1.3 billion.

Metals are no longer an injury to humans. EPA says they're a danger to the fish and some of the birds, but if we have no idea of the content of that water that seeps down in, don't know how much metals are in there, what's the $1.3 million supposed to protect besides the jobs of the EPA themselves?

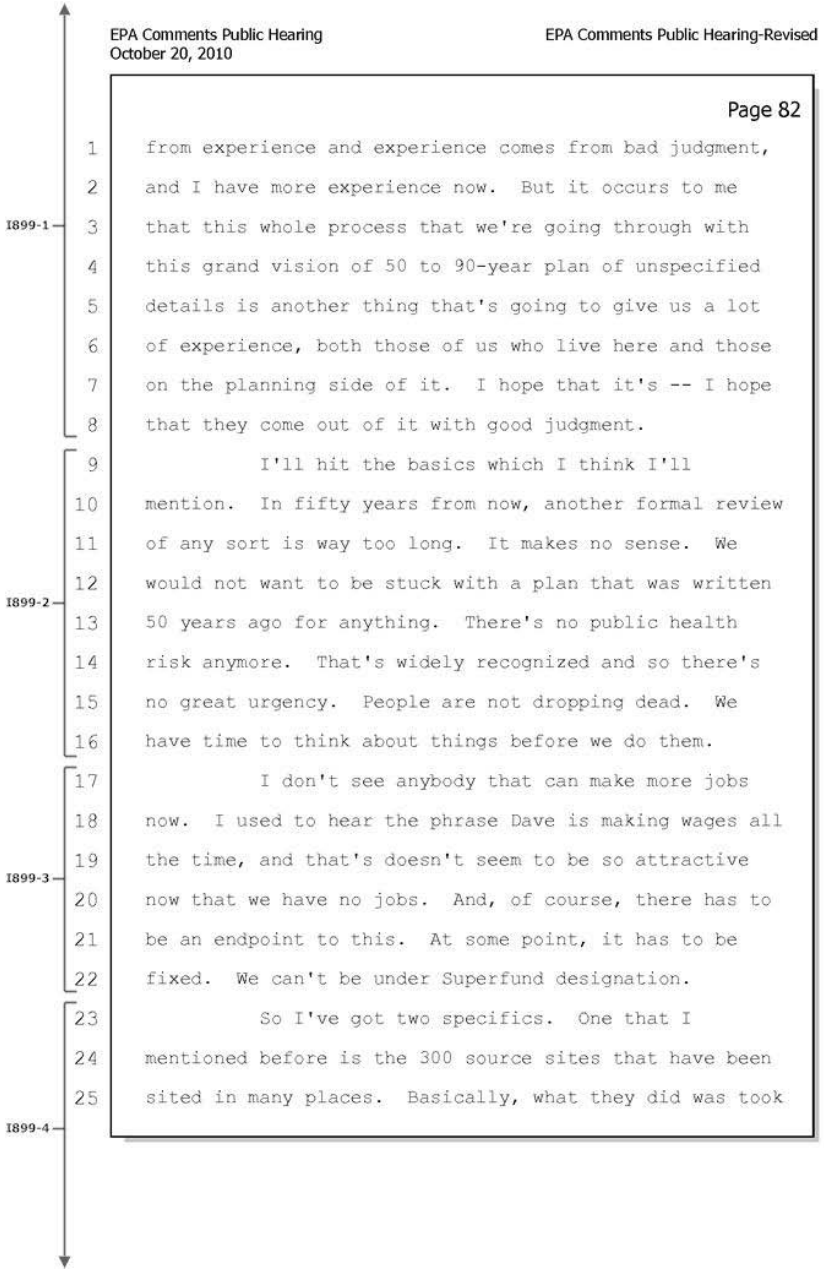
(Applause.)

MAYOR VESTER: David Sherman followed by Duane Jerome.

DAVID SHERMAN: Hi, I'm David Sherman. I'm a Wallace resident and property owner and licensed professional engineer, and I'm speaking for myself tonight. I apologize for my rather rough-looking appearance. There's a saying that good judgment comes

I899-1

Response to comment I899-1
Comment noted.



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from experience and experience comes from bad judgment, and I have more experience now. But it occurs to me that this whole process that we're going through with this grand vision of 50 to 90-year plan of unspecified details is another thing that's going to give us a lot of experience, both those of us who live here and those on the planning side of it. I hope that it's -- I hope that they come out of it with good judgment.

I'll hit the basics which I think I'll mention. In fifty years from now, another formal review of any sort is way too long. It makes no sense. We would not want to be stuck with a plan that was written 50 years ago for anything. There's no public health risk anymore. That's widely recognized and so there's no great urgency. People are not dropping dead. We have time to think about things before we do them.

I don't see anybody that can make more jobs now. I used to hear the phrase Dave is making wages all the time, and that's doesn't seem to be so attractive now that we have no jobs. And, of course, there has to be an endpoint to this. At some point, it has to be fixed. We can't be under Superfund designation.

So I've got two specifics. One that I mentioned before is the 300 source sites that have been sited in many places. Basically, what they did was took

I899-1

I899-2

I899-3

I899-4

Response to comment I899-2

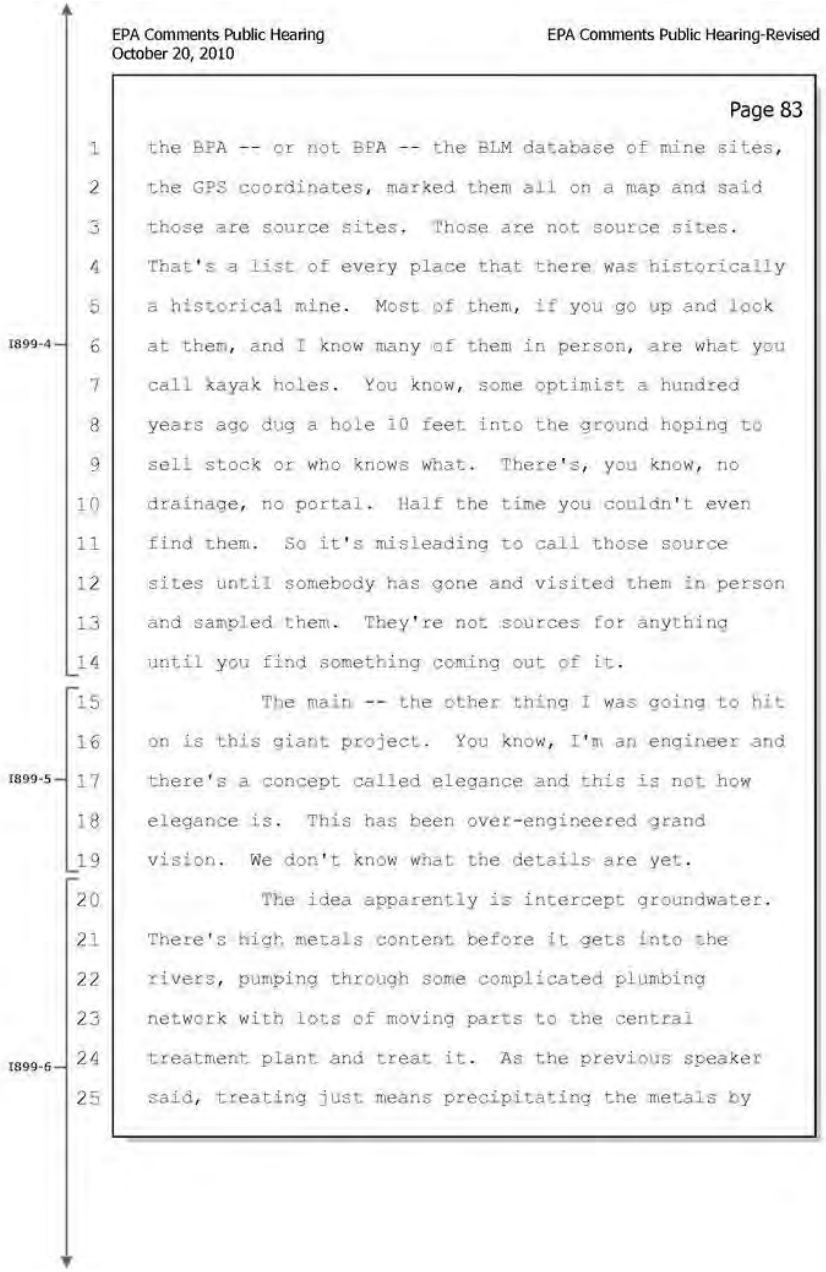
See response to Comment No. I58-1 regarding duration of the Selected Remedy. EPA and other agencies have conducted many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. The primary human health concern in the Coeur d'Alene Basin is excessive lead in the blood of young children and pregnant women which can cause significant impacts to human health.

Response to comment I899-3

See responses to Comment Nos. I58-5 and I474-1.

Response to comment I899-4

See response to Comment No. I822-14.



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the BPA -- or not BPA -- the BLM database of mine sites, the GPS coordinates, marked them all on a map and said those are source sites. Those are not source sites. That's a list of every place that there was historically a historical mine. Most of them, if you go up and look at them, and I know many of them in person, are what you call kayak holes. You know, some optimist a hundred years ago dug a hole 10 feet into the ground hoping to sell stock or who knows what. There's, you know, no drainage, no portal. Half the time you couldn't even find them. So it's misleading to call those source sites until somebody has gone and visited them in person and sampled them. They're not sources for anything until you find something coming out of it.

I899-4

The main -- the other thing I was going to hit on is this giant project. You know, I'm an engineer and there's a concept called elegance and this is not how elegance is. This has been over-engineered grand vision. We don't know what the details are yet.

I899-5

The idea apparently is intercept groundwater. There's high metals content before it gets into the rivers, pumping through some complicated plumbing network with lots of moving parts to the central treatment plant and treat it. As the previous speaker said, treating just means precipitating the metals by

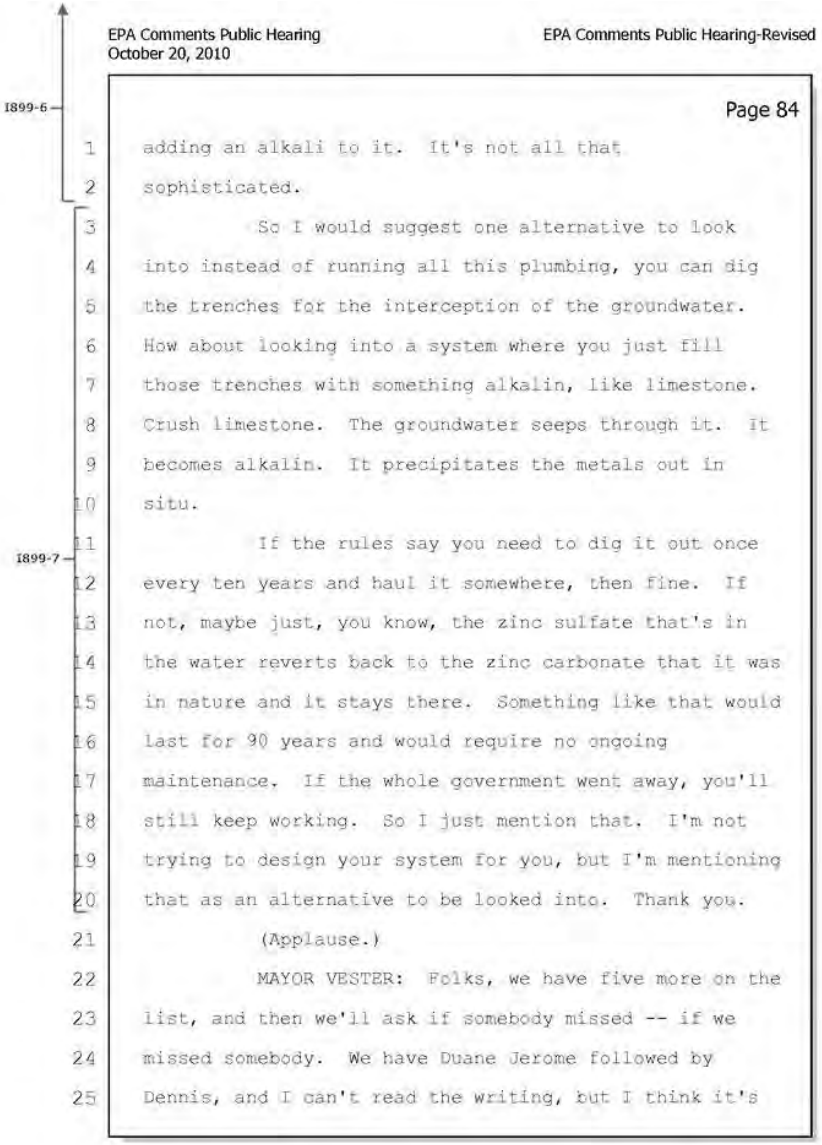
I899-6

Response to comment I899-5

Comment noted. See response to Comment No. I58-1 regarding the reduced scope of the Selected Remedy compared to the Preferred Alternative in the Proposed Plan.

Response to comment I899-6

The pipelines that will collect and convey contaminated waters from the Upper Basin (outside the Bunker Hill Box) to the CTP for treatment will be simple, gravity flow systems. There will not be "lots of moving parts".



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I899-6

Page 84

adding an alkali to it. It's not all that sophisticated.

So I would suggest one alternative to look into instead of running all this plumbing, you can dig the trenches for the interception of the groundwater. How about looking into a system where you just fill those trenches with something alkalin, like limestone. Crush limestone. The groundwater seeps through it. It becomes alkalin. It precipitates the metals out in situ.

I899-7

If the rules say you need to dig it out once every ten years and haul it somewhere, then fine. If not, maybe just, you know, the zinc sulfate that's in the water reverts back to the zinc carbonate that it was in nature and it stays there. Something like that would last for 90 years and would require no ongoing maintenance. If the whole government went away, you'll still keep working. So I just mention that. I'm not trying to design your system for you, but I'm mentioning that as an alternative to be looked into. Thank you.

(Applause.)

MAYOR VESTER: Folks, we have five more on the list, and then we'll ask if somebody missed -- if we missed somebody. We have Duane Jerome followed by Dennis, and I can't read the writing, but I think it's

Response to comment I899-7

Water collected for treatment will include both contaminated groundwater and adit discharges. Early design activities will include modeling or sampling to inform planning for future water treatment actions, including suitability for treatment at the CTP or onsite using semi-passive technologies. Through ongoing adaptive management and the CERCLA Five-Year Review process, EPA anticipates using the information gained to make adjustments to implementation plans and to evaluate and implement new technologies where appropriate.

The use of in situ alkaline permeable reactive barriers (PRB) was specifically evaluated by EPA during the Focused Feasibility Study (in Appendix F of EPA, 2012, *Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*) and a typical conceptual design was developed for this technology. At this time, there are no sites where the technology is planned for implementation. However, as additional site data are collected, sites where in situ PRBs could be used may be identified. One the primary limitations for use of the technology at the Bunker Hill Superfund Site is the relatively high rate of groundwater flow in most areas. High groundwater velocities require thick PRBs for sufficient hydraulic retention times and effective treatment. The thicker the PRB, the higher the cost.

Sherman, David, I221, Letter 610097-16

The present jobs the EPA is talking about are part-time jobs you work in the summer. They are fine for kids going to college. They helped my kid through college. But they are not gonna raise families, put your kids through college.

I think it's time for the EPA to go home to Seattle. I also think it's unreasonable to expect that you can develop a 90-year plan and for us to agree to it without having comment. They'll let us make comments, but they'll say it's already passed, just like they have in a lot of other government things. I think they need to shorten it down so we can have comments and at least have some interaction with them.

If they get this 90-year, they're not gonna have to ask you anything; they're just gonna do what they want. That's all I've got.

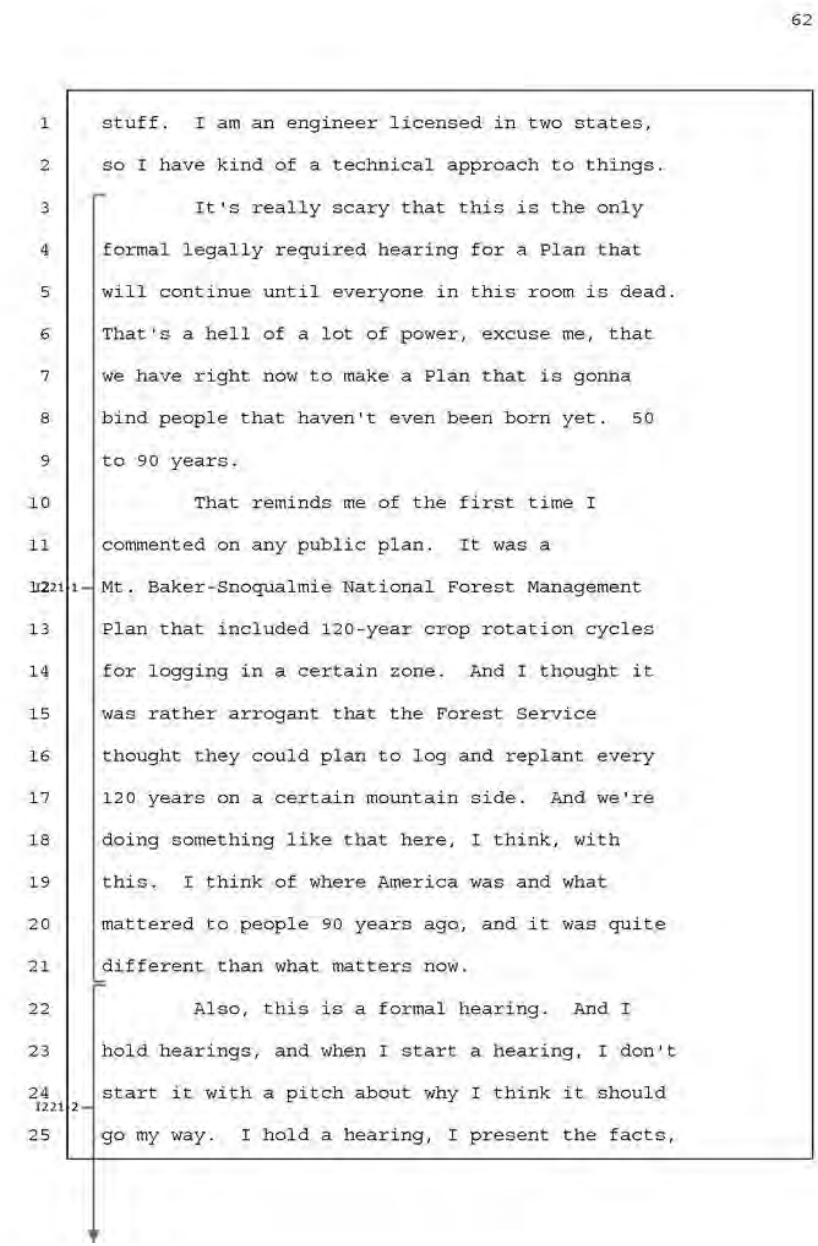
BOB WHEELER: Thank you, Eric. David Sherman. After David is Hap, and then Jean or Jen Joyce Broadsword.

SENATOR JOYCE BROADSWORD: That's Senator Joyce Broadsword.

BOB WHEELER: Sorry, Senator.

DAVID SHERMAN: Hi. David Sherman. I won't bother with credentials and offices and

No comments



62

stuff. I am an engineer licensed in two states, so I have kind of a technical approach to things.

It's really scary that this is the only formal legally required hearing for a Plan that will continue until everyone in this room is dead. That's a hell of a lot of power, excuse me, that we have right now to make a Plan that is gonna bind people that haven't even been born yet. 50 to 90 years.

That reminds me of the first time I commented on any public plan. It was a I221-1 Mt. Baker-Snoqualmie National Forest Management Plan that included 120-year crop rotation cycles for logging in a certain zone. And I thought it was rather arrogant that the Forest Service thought they could plan to log and replant every 120 years on a certain mountain side. And we're doing something like that here, I think, with this. I think of where America was and what mattered to people 90 years ago, and it was quite different than what matters now.

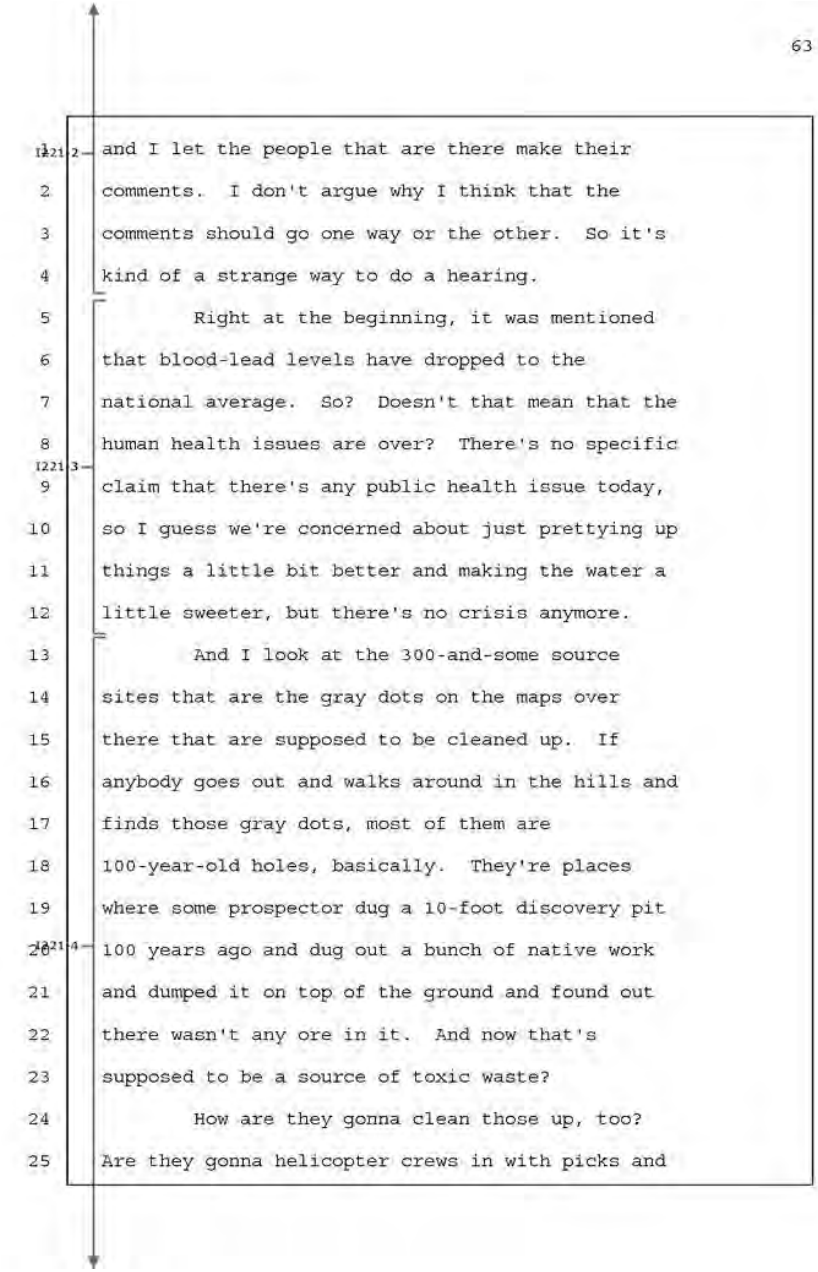
Also, this is a formal hearing. And I hold hearings, and when I start a hearing, I don't I221-2 start it with a pitch about why I think it should go my way. I hold a hearing, I present the facts,

Response to comment I221-1

See response to Comment No. I58-1.

Response to comment I221-2

EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of our work. Most importantly, we have encouraged the public to provide comments and input on remedy selection. EPA has provided a wide range of opportunities for community participation in selection of a remedy for the Upper Basin. Since late 2008, EPA has hosted and/or attended about 75 meetings to share information and gather input about development of the Focused Feasibility Study Report and Proposed Plan. EPA has engaged local residents, elected officials, community groups, and many other stakeholders in the decision process. This outreach includes working with the Basin Commission, its Technical Leadership Group (TLG), and the Citizens' Coordinating Council (CCC). EPA also submitted drafts of the Focused Feasibility Study Report to stakeholders and the Basin Commission for review and comment to assist EPA in preparing a final report. Based on requests from the public after the Proposed Plan was issued, the comment period was extended 90 additional days, for a total of 135 days for comment on the Proposed Plan and Draft Final Focused Feasibility Study Report. During the comment period, EPA held three informal open houses, hosted a formal public comment meeting that was transcribed, attended numerous community meetings, and hosted a public tour of some of the sites included in the Proposed Plan. EPA also participated in U. S. Senator Crapo's Town Hall meeting in Kellogg and the Wallace Town Hall meeting sponsored by the Upper Basin mayors.



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I221-2 and I let the people that are there make their comments. I don't argue why I think that the comments should go one way or the other. So it's kind of a strange way to do a hearing.

Right at the beginning, it was mentioned that blood-lead levels have dropped to the national average. So? Doesn't that mean that the human health issues are over? There's no specific I221-3 claim that there's any public health issue today, so I guess we're concerned about just prettying up things a little bit better and making the water a little sweeter, but there's no crisis anymore.

And I look at the 300-and-some source sites that are the gray dots on the maps over there that are supposed to be cleaned up. If anybody goes out and walks around in the hills and finds those gray dots, most of them are 100-year-old holes, basically. They're places where some prospector dug a 10-foot discovery pit I221-4 100 years ago and dug out a bunch of native work and dumped it on top of the ground and found out there wasn't any ore in it. And now that's supposed to be a source of toxic waste?

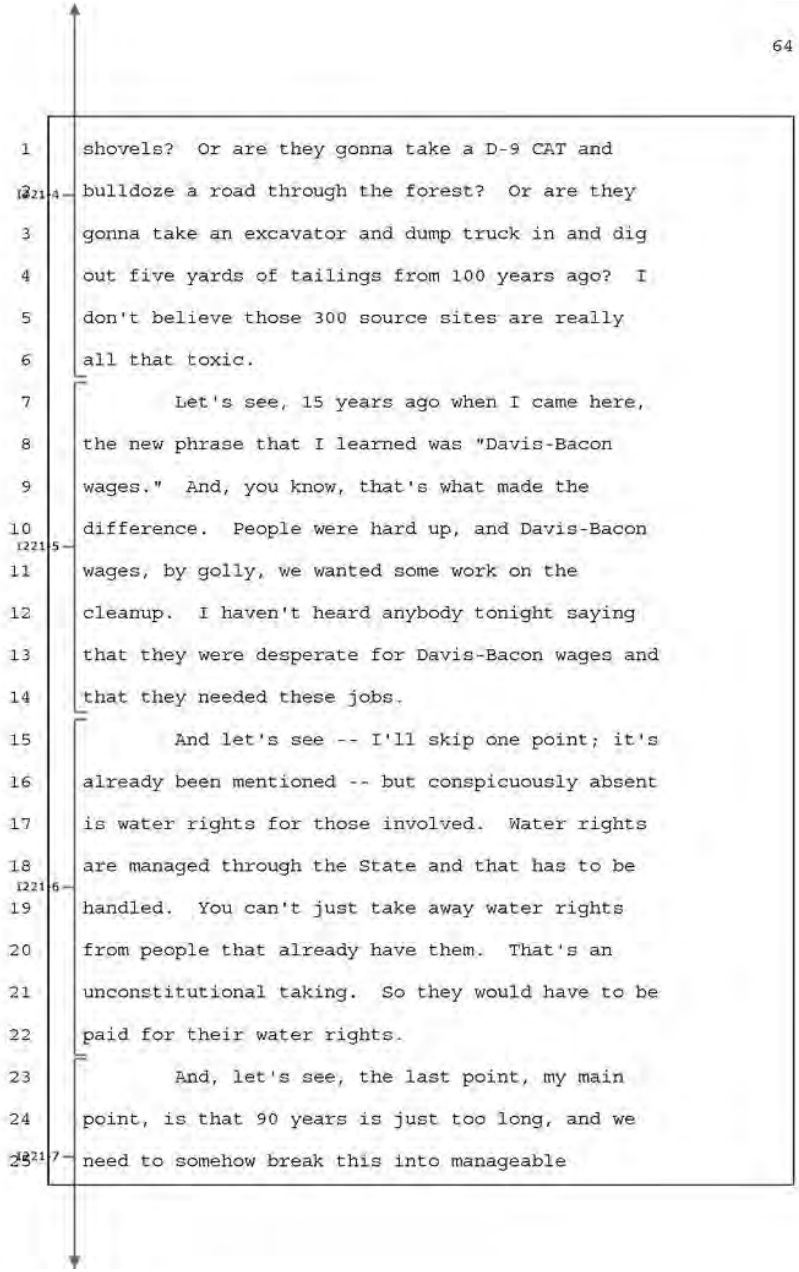
How are they gonna clean those up, too? Are they gonna helicopter crews in with picks and

Response to comment I221-3

See response to Comment No. I295-1.

Response to comment I221-4

See response to Comment No. I822-14.



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shovels? Or are they gonna take a D-9 CAT and
I221-4 bulldoze a road through the forest? Or are they
gonna take an excavator and dump truck in and dig
out five yards of tailings from 100 years ago? I
don't believe those 300 source sites are really
all that toxic.

Let's see, 15 years ago when I came here,
the new phrase that I learned was "Davis-Bacon
wages." And, you know, that's what made the
difference. People were hard up, and Davis-Bacon
I221-5 wages, by golly, we wanted some work on the
cleanup. I haven't heard anybody tonight saying
that they were desperate for Davis-Bacon wages and
that they needed these jobs.

And let's see -- I'll skip one point; it's
already been mentioned -- but conspicuously absent
is water rights for those involved. Water rights
are managed through the State and that has to be
I221-6 handled. You can't just take away water rights
from people that already have them. That's an
unconstitutional taking. So they would have to be
paid for their water rights.

And, let's see, the last point, my main
point, is that 90 years is just too long, and we
I221-7 need to somehow break this into manageable

Response to comment I221-5

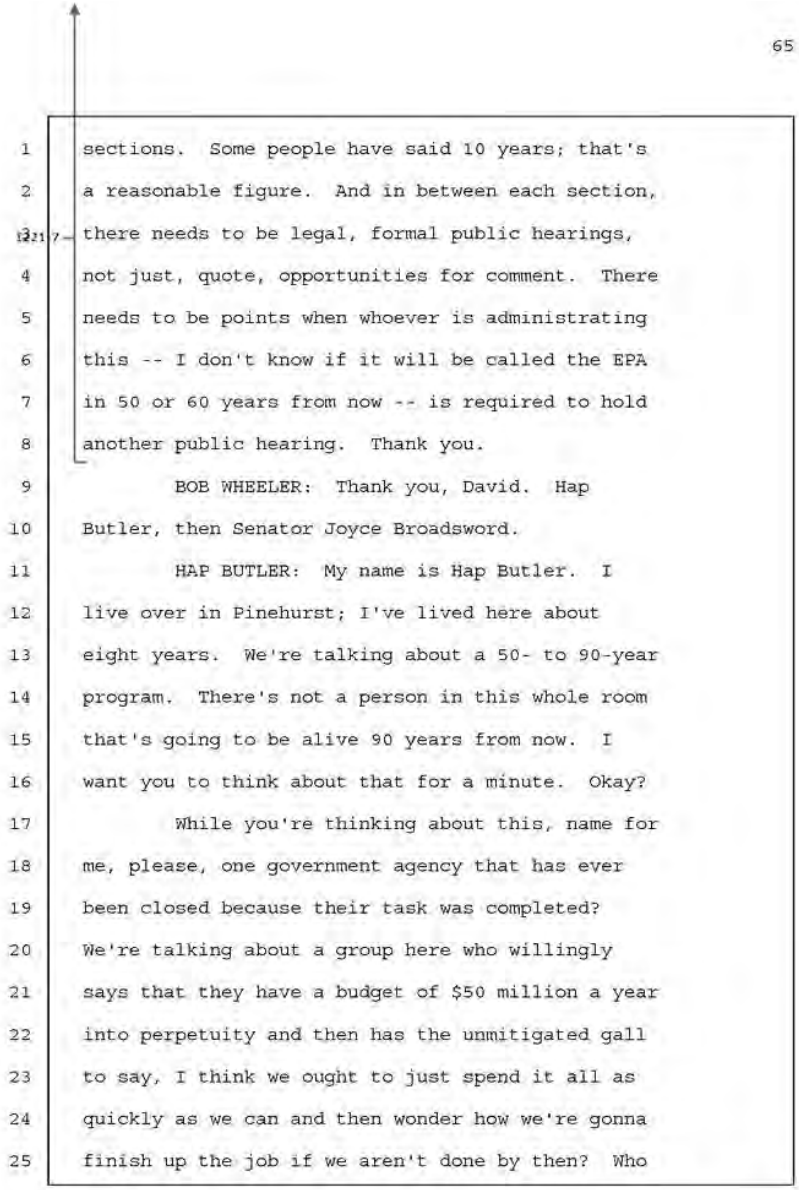
See response to Comment No. LC32-2.

Response to comment I221-6

See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I221-7

See responses to Comment Nos. I58-1 and I58-4.



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sections. Some people have said 10 years; that's a reasonable figure. And in between each section, there needs to be legal, formal public hearings, not just, quote, opportunities for comment. There needs to be points when whoever is administrating this -- I don't know if it will be called the EPA in 50 or 60 years from now -- is required to hold another public hearing. Thank you.

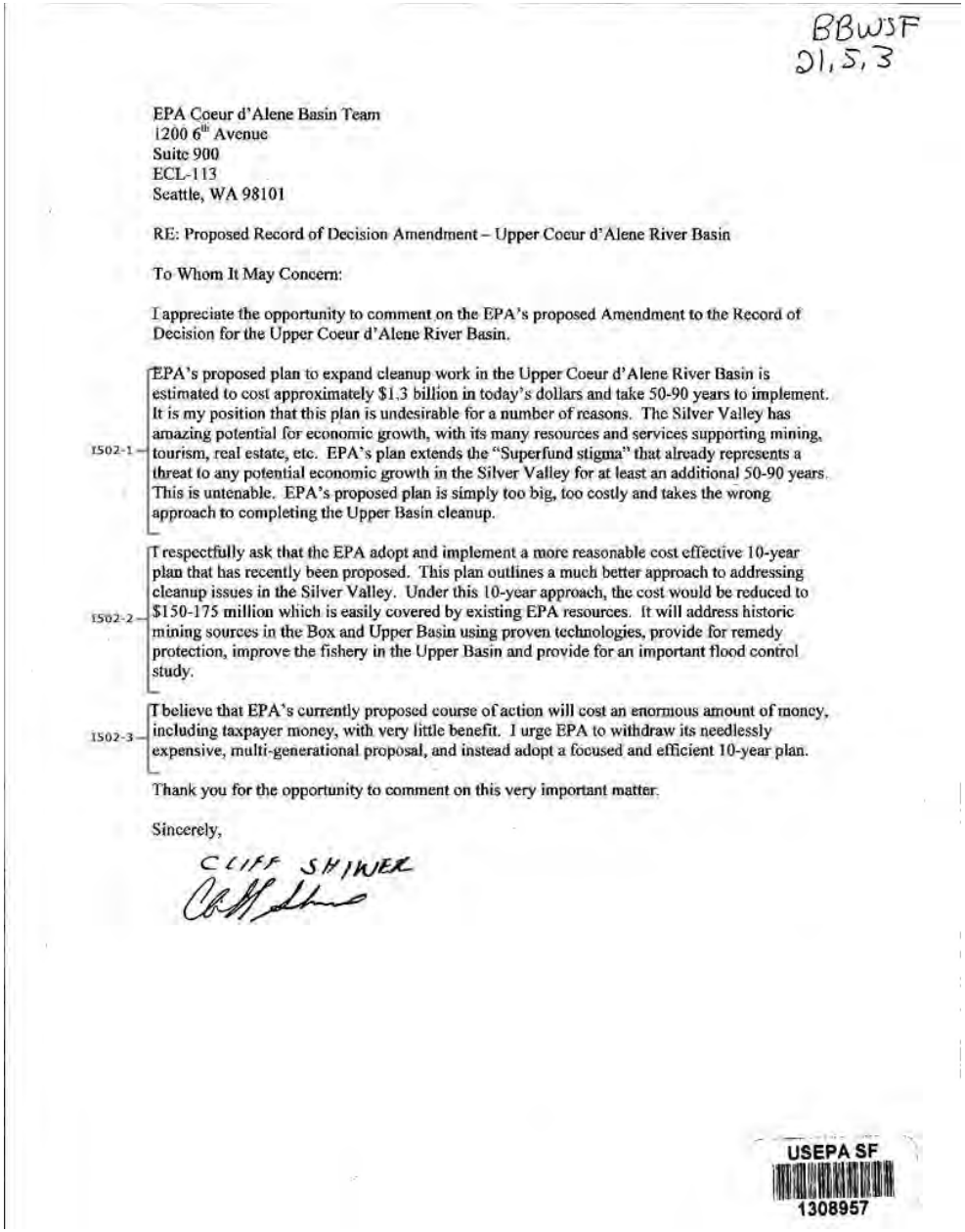
BOB WHEELER: Thank you, David. Hap Butler, then Senator Joyce Broadsword.

HAP BUTLER: My name is Hap Butler. I live over in Pinehurst; I've lived here about eight years. We're talking about a 50- to 90-year program. There's not a person in this whole room that's going to be alive 90 years from now. I want you to think about that for a minute. Okay?

While you're thinking about this, name for me, please, one government agency that has ever been closed because their task was completed? We're talking about a group here who willingly says that they have a budget of $50 million a year into perpetuity and then has the unmitigated gall to say, I think we ought to just spend it all as quickly as we can and then wonder how we're gonna finish up the job if we aren't done by then? Who

No comments

Shiner, Cliff, I502, Letter 1308957



BBWJF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I502-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I502-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I502-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

CLIFF SHINER

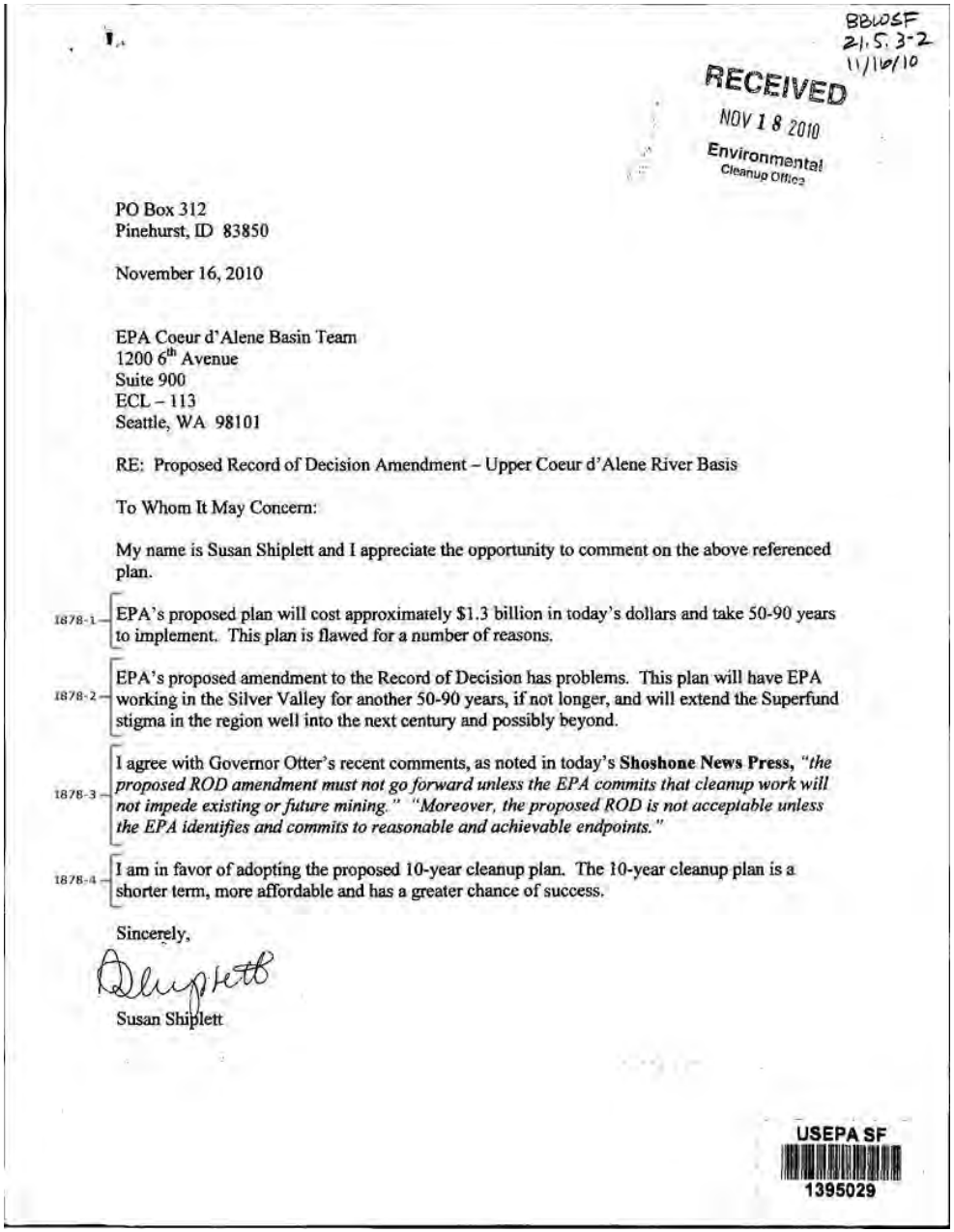
USEPA SF
1308957

Response to comment I502-1
See response to Comment No. I474-1.

Response to comment I502-2
See response to Comment No. I474-2.

Response to comment I502-3
See response to Comment No. I474-3.

Shiplett, Susan, I878, Letter 1395029



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11/16/10

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NOV 18 2010
Environmental
Cleanup Office

PO Box 312
Pinehurst, ID 83850

November 16, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL – 113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basis

To Whom It May Concern:

My name is Susan Shiplett and I appreciate the opportunity to comment on the above referenced plan.

I878-1 EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I878-2 EPA's proposed amendment to the Record of Decision has problems. This plan will have EPA working in the Silver Valley for another 50-90 years, if not longer, and will extend the Superfund stigma in the region well into the next century and possibly beyond.

I878-3 I agree with Governor Otter's recent comments, as noted in today's **Shoshone News Press,** *"the proposed ROD amendment must not go forward unless the EPA commits that cleanup work will not impede existing or future mining." "Moreover, the proposed ROD is not acceptable unless the EPA identifies and commits to reasonable and achievable endpoints."*

I878-4 I am in favor of adopting the proposed 10-year cleanup plan. The 10-year cleanup plan is a shorter term, more affordable and has a greater chance of success.

Sincerely,

Susan Shiplett

USEPA SF
1395029

Response to comment I878-1

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I878-2

See responses to Comment Nos. I474-1 and I58-1.

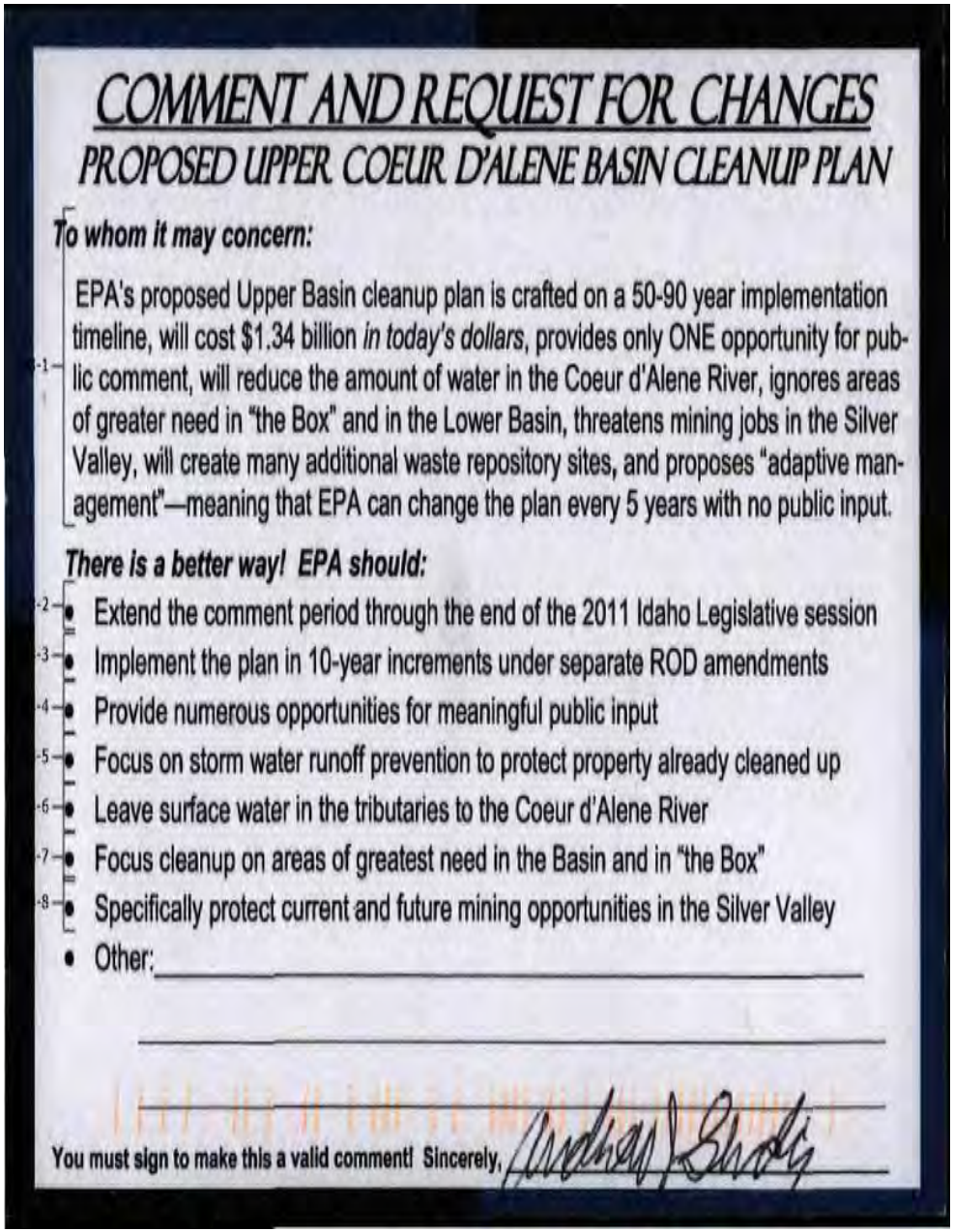
Response to comment I878-3

See responses to Comment Nos. I58-5 and SA4-11.

Response to comment I878-4

See response to Comment No. I474-2.

Shody, Andrea, I193, Letter 1357505



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input. -1

There is a better way! EPA should:

- Extend the comment period through the end of the 2011 Idaho Legislative session -2
- Implement the plan in 10-year increments under separate ROD amendments -3
- Provide numerous opportunities for meaningful public input -4
- Focus on storm water runoff prevention to protect property already cleaned up -5
- Leave surface water in the tributaries to the Coeur d'Alene River -6
- Focus cleanup on areas of greatest need in the Basin and in "the Box" -7
- Specifically protect current and future mining opportunities in the Silver Valley -8
- Other: _____

You must sign to make this a valid comment! Sincerely, Andrea J. Shody

Response to comment I193-1
See response to Comment No. I25-1.

Response to comment I193-2
See response to Comment No. I25-2.

Response to comment I193-3
See response to Comment No. I25-3.

Response to comment I193-4
See response to Comment No. I25-4.

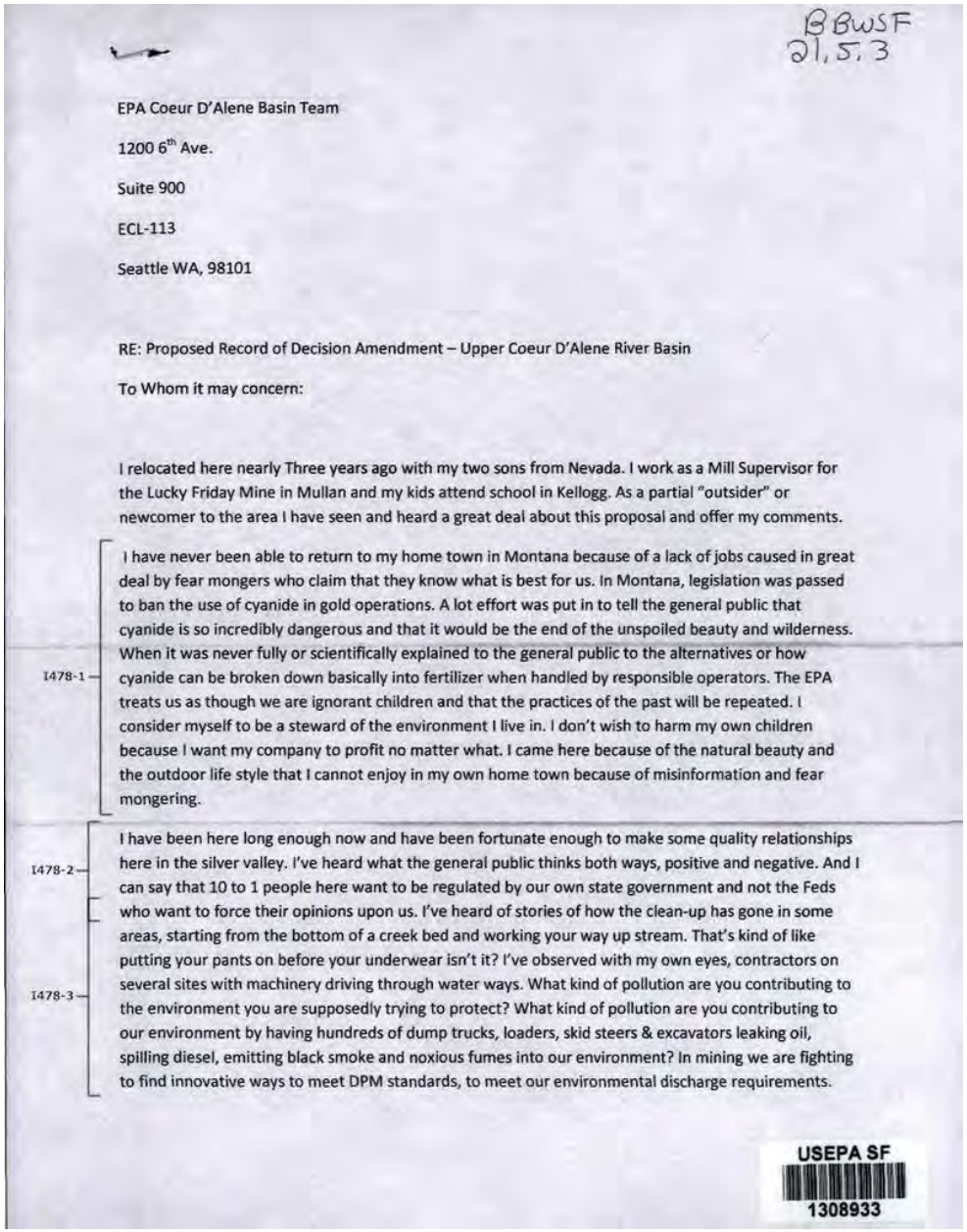
Response to comment I193-5
See response to Comment No. I25-5.

Response to comment I193-6
See response to Comment No. I25-6.

Response to comment I193-7
See response to Comment No. I25-7.

Response to comment I193-8
See response to Comment No. I25-8.

Sholey, Neil, I478, Letter 1308933



BBWSF
21,5,3

EPA Coeur D'Alene Basin Team

1200 6th Ave.

Suite 900

ECL-113

Seattle WA, 98101

RE: Proposed Record of Decision Amendment – Upper Coeur D'Alene River Basin

To Whom it may concern:

I relocated here nearly Three years ago with my two sons from Nevada. I work as a Mill Supervisor for the Lucky Friday Mine in Mullan and my kids attend school in Kellogg. As a partial "outsider" or newcomer to the area I have seen and heard a great deal about this proposal and offer my comments.

I478-1 I have never been able to return to my home town in Montana because of a lack of jobs caused in great deal by fear mongers who claim that they know what is best for us. In Montana, legislation was passed to ban the use of cyanide in gold operations. A lot effort was put in to tell the general public that cyanide is so incredibly dangerous and that it would be the end of the unspoiled beauty and wilderness. When it was never fully or scientifically explained to the general public to the alternatives or how cyanide can be broken down basically into fertilizer when handled by responsible operators. The EPA treats us as though we are ignorant children and that the practices of the past will be repeated. I consider myself to be a steward of the environment I live in. I don't wish to harm my own children because I want my company to profit no matter what. I came here because of the natural beauty and the outdoor life style that I cannot enjoy in my own home town because of misinformation and fear mongering.

I478-2 I have been here long enough now and have been fortunate enough to make some quality relationships here in the silver valley. I've heard what the general public thinks both ways, positive and negative. And I can say that 10 to 1 people here want to be regulated by our own state government and not the Feds who want to force their opinions upon us. I've heard of stories of how the clean-up has gone in some areas, starting from the bottom of a creek bed and working your way up stream. That's kind of like putting your pants on before your underwear isn't it? I've observed with my own eyes, contractors on several sites with machinery driving through water ways. What kind of pollution are you contributing to

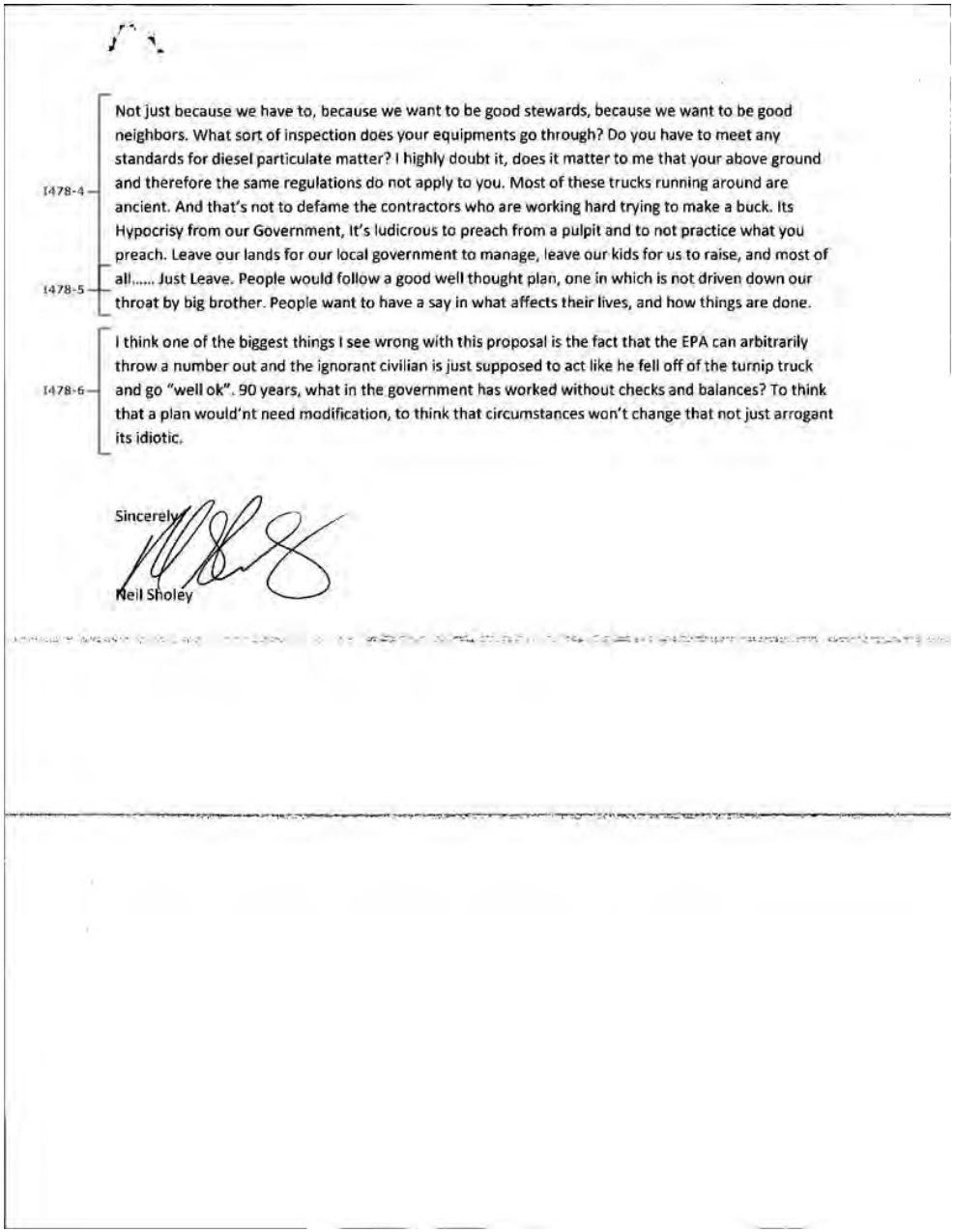
I478-3 the environment you are supposedly trying to protect? What kind of pollution are you contributing to our environment by having hundreds of dump trucks, loaders, skid steers & excavators leaking oil, spilling diesel, emitting black smoke and noxious fumes into our environment? In mining we are fighting to find innovative ways to meet DPM standards, to meet our environmental discharge requirements.

USEPA SF
1308933

Response to comment I478-1
Comment noted.

Response to comment I478-2
EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Response to comment I478-3
The remediation in the Upper Basin will be conducted in a careful manner that seeks to minimize both contamination resulting from the activities and recontamination of remediated areas. The construction details will be worked out in the design phase of the cleanup activities. Regarding the implementation of the Selected Remedy, see the ROD Amendment, Part 2, Section 12.3.



I478-4 Not just because we have to, because we want to be good stewards, because we want to be good neighbors. What sort of inspection does your equipments go through? Do you have to meet any standards for diesel particulate matter? I highly doubt it, does it matter to me that your above ground and therefore the same regulations do not apply to you. Most of these trucks running around are ancient. And that's not to defame the contractors who are working hard trying to make a buck. Its Hypocrisy from our Government, It's ludicrous to preach from a pulpit and to not practice what you preach. Leave our lands for our local government to manage, leave our kids for us to raise, and most of all..... Just Leave. People would follow a good well thought plan, one in which is not driven down our throat by big brother. People want to have a say in what affects their lives, and how things are done.

I478-5

I478-6 I think one of the biggest things I see wrong with this proposal is the fact that the EPA can arbitrarily throw a number out and the ignorant civilian is just supposed to act like he fell off of the turnip truck and go "well ok". 90 years, what in the government has worked without checks and balances? To think that a plan would'nt need modification, to think that circumstances won't change that not just arrogant its idiotic.

Sincerely,

Neil Sholey

Response to comment I478-4

Comment noted. All EPA and IDEQ contractors are required to meet the substantive portions of local, state and federal regulations, including those pertaining to transportation.

Response to comment I478-5

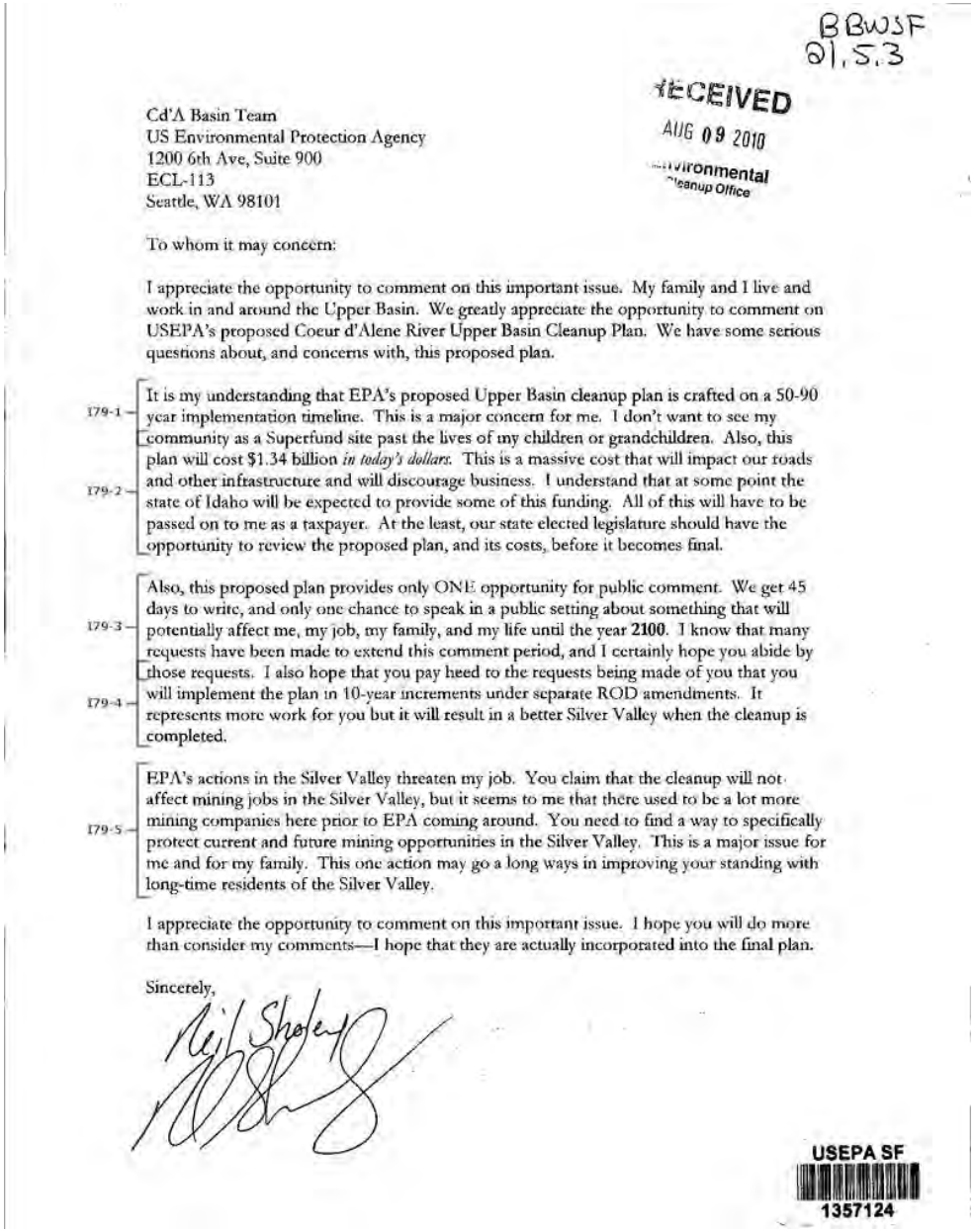
EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of its work. Most importantly, EPA has encouraged the public to provide comments and input on selection of the remedies for OUs 1, 2, and 3 and, most recently, the Selected Remedy for the Upper Basin. During the Focused Feasibility Study (FFS) for the Upper Basin, EPA met regularly with the Basin Environmental Improvement Project Commission's (the Basin Commission's) Upper Basin Project Focus Team (PFT), a group focused on technical issues related to cleanup and primarily composed of interested citizens and representatives from the State of Idaho, Shoshone County, the U.S. Bureau of Land Management, the U.S. Fish and Wildlife Service, the U.S. Forest Service, the Coeur d'Alene and Spokane Tribes, and the State of Washington. Additional stakeholders participated in some of these meetings, including mining industry representatives. Together, EPA and the Upper Basin PFT developed the remedial alternatives that were subsequently evaluated in the Draft Final FFS Report (CH2M HILL, 2010, *Draft Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). Numerous variations on these alternatives were carefully considered and screened by the PFT prior to development of the final alternatives. EPA has continued to work closely with the PFT during development of the Selected Remedy for the Upper Basin and associated implementation planning. The PFT was particularly instrumental in helping prioritize actions, including remedy protection actions, to include in the Selected Remedy. The PFT continues to work with EPA on implementation planning for the remedy. In addition to its meetings with the Upper Basin PFT, EPA has provided a wide range of opportunities for community participation in the selection of a remedy for the Upper Basin. Since late 2008, EPA has hosted and/or attended about 60 meetings to share

information and gather input for development of the FFS Report and the Proposed Plan (EPA, 2010, *Proposed Plan, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site*). EPA has engaged local residents, elected officials, community groups, and many other stakeholders in the decisionmaking process. This outreach has included working with the Basin Commission, its Technical Leadership Group (TLG), and the Citizens' Coordinating Council (CCC). EPA also submitted drafts of the Draft Final FFS Report to stakeholders and the Basin Commission's Upper Basin PFT for review and comment to assist EPA in preparing a final report.

Response to comment I478-6

See response to Comment No. I58-1.

Sholey, Neil, I79, Letter 1357124



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21.5.3

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AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I79-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I79-2

I79-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I79-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I79-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Neil Sholey

USEPA SF
1357124

Response to comment I79-1
See response to Comment No. I58-1.

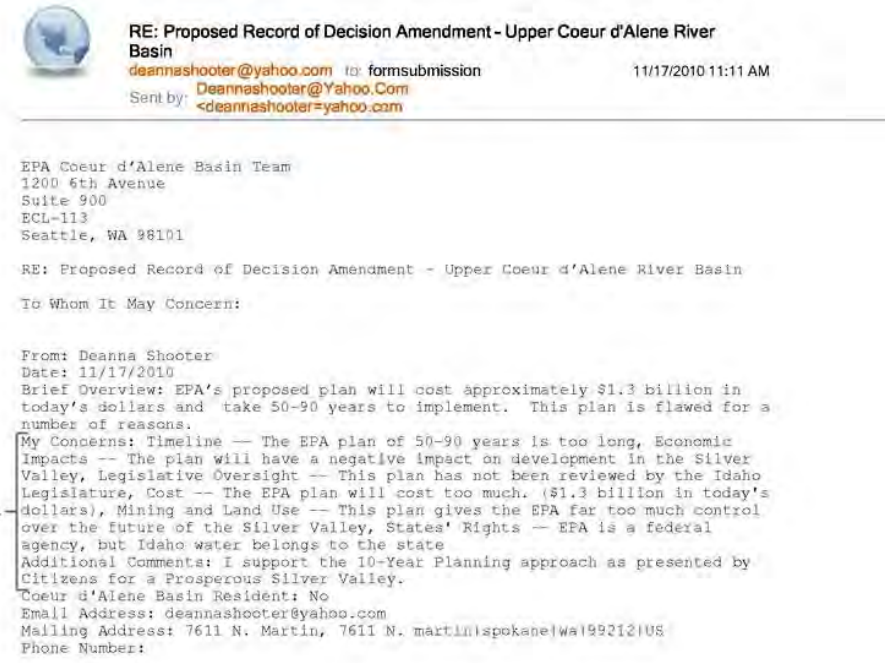
Response to comment I79-2
See response to Comment No. I58-2.

Response to comment I79-3
See response to Comment No. I58-3.

Response to comment I79-4
See response to Comment No. I58-4.

Response to comment I79-5
See response to Comment No. I58-5.

Shooter, Deanna, I757, Letter 618755



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

deannashooter@yahoo.com to: formsubmission 11/17/2010 11:11 AM

Sent by: Deannashooter@Yahoo.Com <deannashooter=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

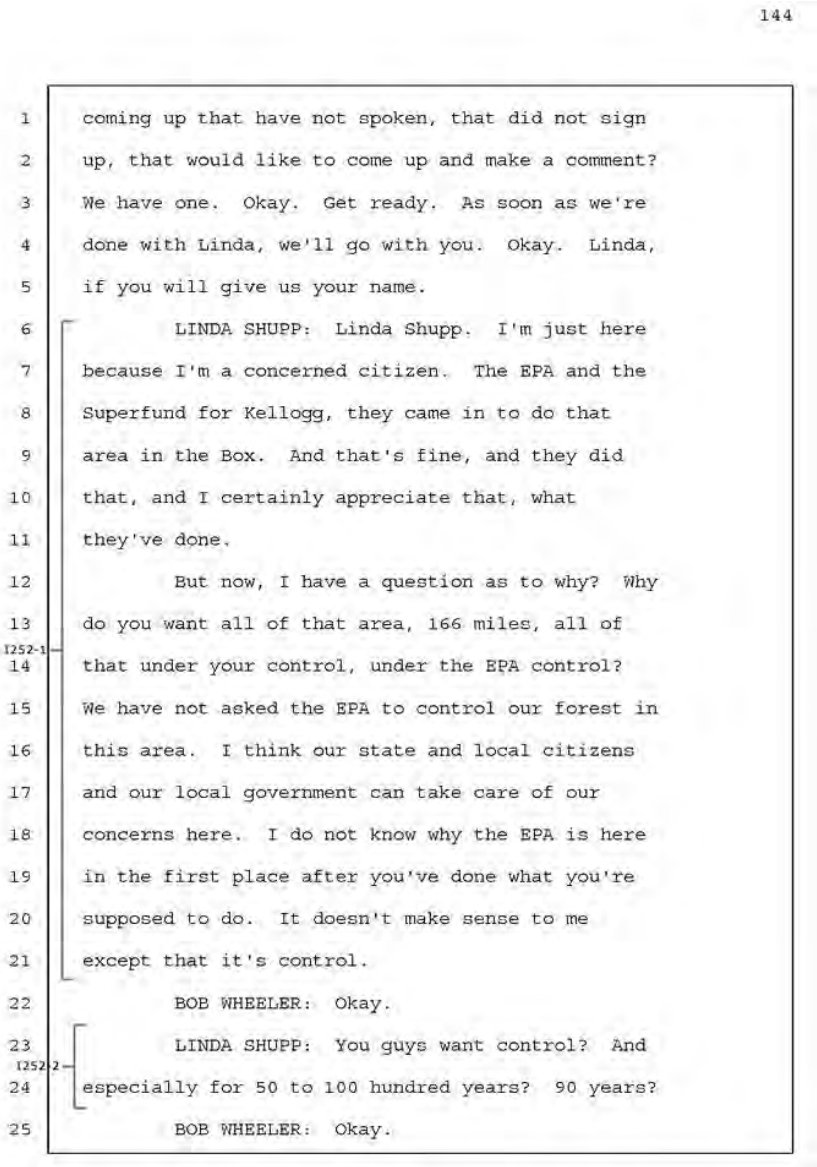
From: Deanna Shooter
Date: 11/17/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I757-1 — My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights — EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: deannashooter@yahoo.com
Mailing Address: 7611 N. Martin, 7611 N. martin|spokane|wa|99212|US
Phone Number:

618755

Response to comment I757-1

See response to Comment No. I351-1.

Shupp, Linda, I252, Letter 610097-47



144

coming up that have not spoken, that did not sign up, that would like to come up and make a comment? We have one. Okay. Get ready. As soon as we're done with Linda, we'll go with you. Okay. Linda, if you will give us your name.

LINDA SHUPP: Linda Shupp. I'm just here because I'm a concerned citizen. The EPA and the Superfund for Kellogg, they came in to do that area in the Box. And that's fine, and they did that, and I certainly appreciate that, what they've done.

But now, I have a question as to why? Why do you want all of that area, 166 miles, all of that under your control, under the EPA control? We have not asked the EPA to control our forest in this area. I think our state and local citizens and our local government can take care of our concerns here. I do not know why the EPA is here in the first place after you've done what you're supposed to do. It doesn't make sense to me except that it's control.

BOB WHEELER: Okay.

LINDA SHUPP: You guys want control? And especially for 50 to 100 hundred years? 90 years?

BOB WHEELER: Okay.

I252-1

I252-2

Response to comment I252-1

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site.

Response to comment I252-2

See response to Comment No. I58-1.

LINDA SHUPP: I mean, it's outrageous. It's not feasible. All right. That's all I had to say.

BOB WHEELER: Thank you, Linda. And we had one other gentleman that had not signed up that wants to speak. If you give your name and any affiliation that you might have.

DOUG WARD: Sorry. I won't keep you too long. I wasn't planning on speaking tonight.

BOB WHEELER: Your name, please?

DOUG WARD: Yeah, my name is Doug Ward. I'm here with Revett Minerals. We do have a footprint in the Basin here. We have mines over in Northwestern Montana.

But what I'm seeing here is a bit of expansion that's pretty frightening. We will be submitting official comments as a company as well.

Mr. Dexter was quite correct. This will have a de facto effect on the mining regulations and will affect mining jobs up here. That worries me as an implication for our country and our ability to do things.

If we submitted a Record of Decision with the do-hoop like this, we'd be thrown right out of the Forest Service office right off the bat. This

No comments

Sienko, David, I758, Letter 618756

EPA's Proposed Plan for the Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site
Dave S
to:
CDABasin
11/23/2010 04:02 PM
Show Details

November 23, 2010

Re: **EPA's Proposed Plan for the Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site**

Ladies and Gentlemen,

I respectfully submit the following comments on the EPA's Proposed Plan for the Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site (Plan), dated July 12, 2010.

I find the Plan at best to be seriously flawed, and at worst an egregious attempt at mission creep and bureaucratic entrenchment by EPA, with similar attempted entrenchment by CH2M Hill.

I758-1 There are numerous flaws to the Plan, many of which undoubtedly will be the source of comments from many other members of the public. For the purposes of this letter, my focus is on two results which would occur if the Plan were to be include in a new ROD for the Upper Basin: (i) an impermissible expansion of CERCLA beyond its intended use, and (ii) the lack of oversight by EPA over CH2M Hill.

Impermissible Expansion of CERCLA

There is no need or legal basis to expand CERCLA beyond its legislative intent to include hazardous waste site cleanup in the regulations for active mining operations. It is important to keep in mind that

I758-2 modern hardrock mines are designed to limit the environmental harms that might lead to a CERCLA NPL designation. It is largely legacy hardrock sites, which were not designed for closure and reclamation that are on the NPL. Therefore, EPA should not, through the Plan, bootstrap CERCLA into a new, unintended source of regulation of the mining industry.

Role of CH2M Hill

It appears that EPA has largely abdicated its role under the NCP and CERCLA to CH2M Hill with respect to developing a plan to address the Upper Basin. In the least, it appears that EPA has not provided meaningful

I758-3 oversight to CH2M Hill. If this is not the case, EPA should, in its response to this and the other comment

618756

Response to comment I758-1

The remedy selection process was conducted in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. Furthermore, as described in the ROD Amendment, Part 2, Section 14.1, Active Facility sites were not included in the Selected Remedy.

Response to comment I758-2

See response to Comment No. I58-5.

Response to comment I758-3

The commenter contention is mistaken. EPA has exercised the decision-making that CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan provides. Consistent with its national practices, EPA has been assisted by contractors, including CH2M Hill, as it evaluated the nature and extent of contamination in the Upper Basin as well remedial approaches for addressing such contamination. Throughout this process EPA has appropriately managed CH2M Hill's work effort and product. EPA further notes that the commenter is in-house counsel for a potentially responsible party to whom EPA provided documentation of the response costs it incurred through its contract with CH2M Hill. In addition, such information has been provided to the public as requested and to the extent that it did not reveal confidential business information.

1758-3 letters, offer a detailed explanation of the role of CH2M Hill in developing the Plan, and fully detail all funds paid over the CH2M Hill and its subcontractors and funds that would be paid over to them over the course of the 50-90 years of the Plan. As part of such, please (i) fully describe the origins of the Plan, (ii) provide meaningful examples of criticism of the Plan and responses thereto in advance of its publication, and (iii) provide better evidence that the Plan is consistent with the NCP and CERCLA and is not a patent grab for revenue by CH2M Hill.

1758-4 On a final note, in a world where national security, jobs, and future economic development were not concerns, it is possible that one could justify a proposed plan that perhaps approaches the scale of the Plan (but not with the same faults of the Plan). However, we do not live in such a world. Rather, in the present day United States, resources and jobs are scarce. Further, virtually every locally-impacted person or entity has unanimously and expressly rejected the Plan. To continue down a path that foists it upon those of us who live and work in Idaho will hopefully be understood by EPA as untenable (and thus withdrawn), and in any event, is unconscionable.

Thank you for the opportunity to provide these comments.

Sincerely,

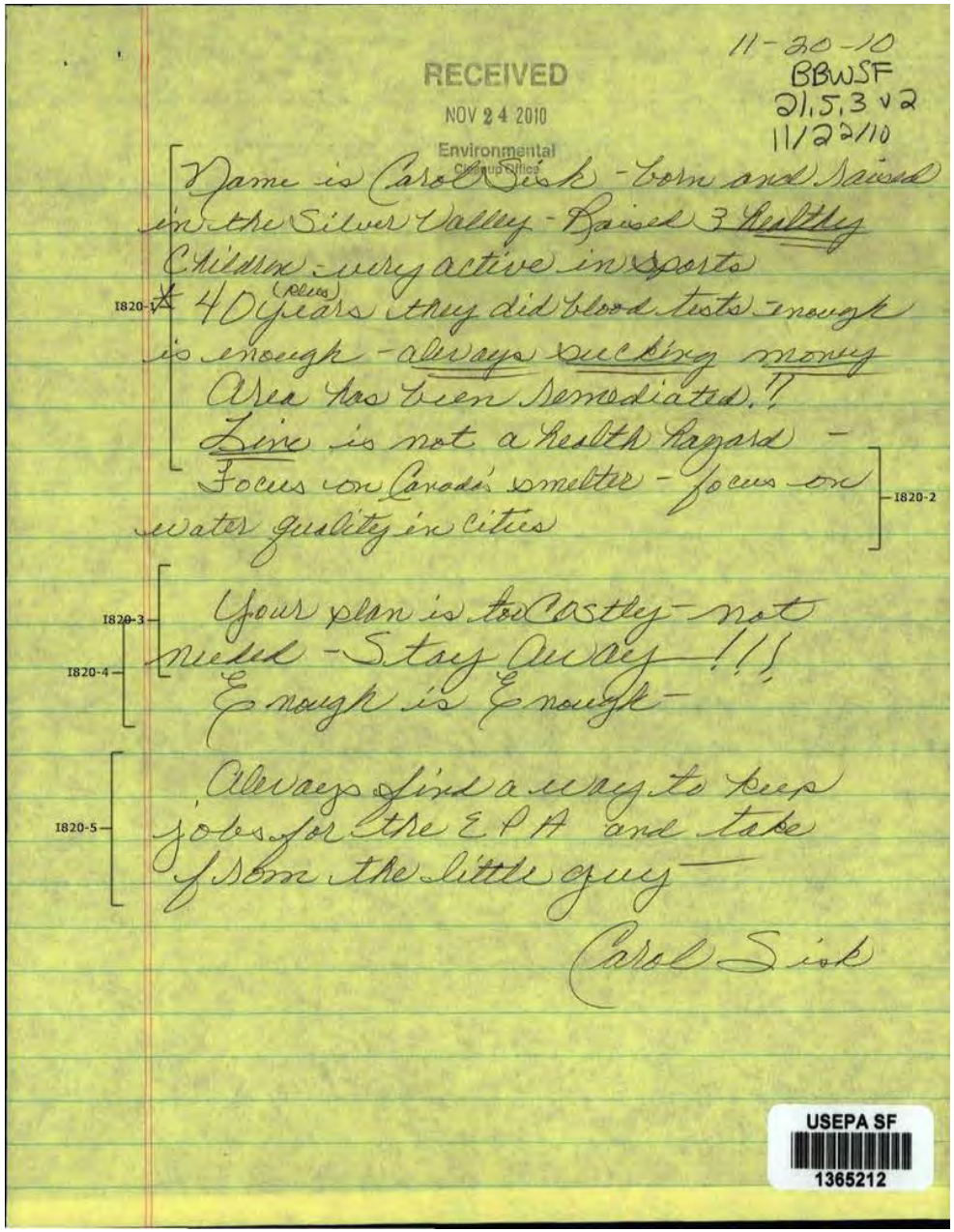
David Sienko

Coeur d'Alene, Idaho

Response to comment I758-4

Comment noted.

Sisk, Carol, I820, Letter 1365212



Response to comment I820-1
EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to addressing these unacceptable risks .

Response to comment I820-2
Comment noted.

Response to comment I820-3
See response to Comment No. I58-2.

Response to comment I820-4
Comment noted.

Response to comment I820-5
EPA is conducting the cleanup because it has a responsibility under the Superfund law to take actions to protect people's health and the environment. See response 154-2.

MY TURN:
Support your Ti

EPA plan is wrong for the region

It may surprise those Idaho residents who do not reside in Shoshone County to learn that those who do live there are fighting a proposed cleanup plan of the historic mine wastes that tinge the Silver Valley. For those of us who have studied the issue, however, it is really no surprise at all.

Jack Lyman
My Turn

The plan proposed by the Environmental Protection Agency would have this federal agency, and the stigma that comes with Superfund, embedded within this region until the year 2100, at an estimated cost of $1.3 billion in today's dollars. Anyone out there care to hazard a guess as to whether $1.3 billion today will be the same as $1.3 billion in 90 years?

This is a complex issue and one of paramount importance to those who depend on this land and these mines for their livelihoods. The reality is that complex issues have complex solutions. In the case of EPA's proposed Upper Basin Cleanup Plan, though, we are still in need of a true solution.

No one disputes that the Bunker Hill smelter did spew lead into the air and pollute the soil. This is a fact. But people need to understand that this

No comments

Jack Lyman

My Turn

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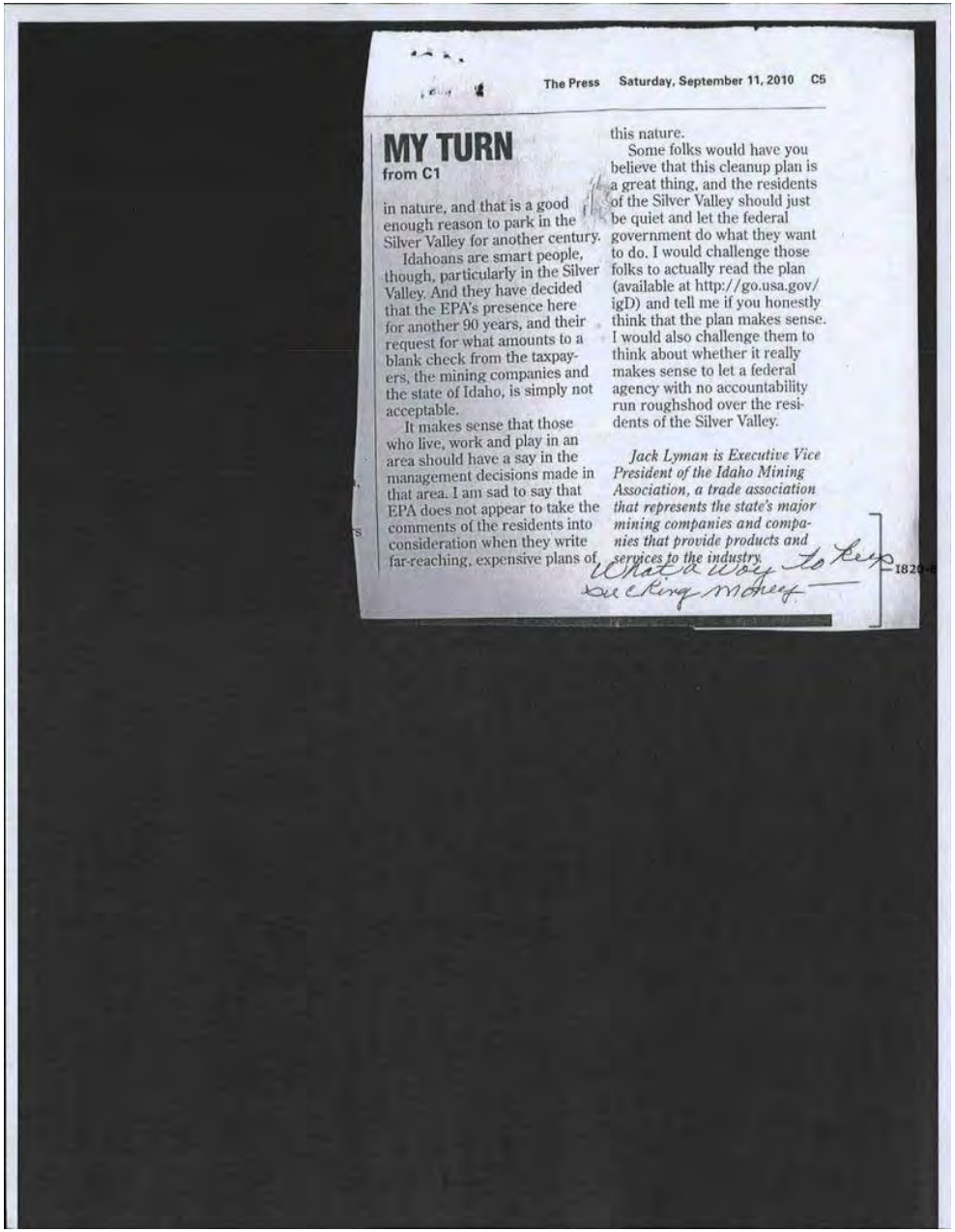
This is a complex issue and one of paramount importance to those who depend on this land and these mines for their livelihoods. The reality is that complex issues have complex solutions. In the case of EPA's proposed Upper Basin Cleanup Plan, though, we are still in need of a true solution.

No one disputes that the Bunker Hill smelter did spew lead into the air and pollute the soil. This is a fact. But people need to understand that this proposed cleanup plan is not focused on the area around Bunker Hill. That area has already been remediated to EPA standards. Rather, this plan is focused primarily on removing zinc from the headwaters of the South Fork of the Coeur d'Alene River, even though zinc does not represent a human health hazard. Let me repeat that; zinc is not a health hazard to humans.

EPA (and apparently the Idaho Department of Environmental Quality as well) have decided that this cleanup is ecological

see MY TURN, C

No comments



The Press Saturday, September 11, 2010 C5

MY TURN
from C1

in nature, and that is a good enough reason to park in the Silver Valley for another century.

Idahoans are smart people, though, particularly in the Silver Valley. And they have decided that the EPA's presence here for another 90 years, and their request for what amounts to a blank check from the taxpayers, the mining companies and the state of Idaho, is simply not acceptable.

It makes sense that those who live, work and play in an area should have a say in the management decisions made in that area. I am sad to say that EPA does not appear to take the comments of the residents into consideration when they write far-reaching, expensive plans of this nature.

Some folks would have you believe that this cleanup plan is a great thing, and the residents of the Silver Valley should just be quiet and let the federal government do what they want to do. I would challenge those folks to actually read the plan (available at http://go.usa.gov/igD) and tell me if you honestly think that the plan makes sense. I would also challenge them to think about whether it really makes sense to let a federal agency with no accountability run roughshod over the residents of the Silver Valley.

Jack Lyman is Executive Vice President of the Idaho Mining Association, a trade association that represents the state's major mining companies and companies that provide products and services to the industry.

What a way to keep I820-6
suckers money

Response to comment I820-6

Comment noted.

Coeur d'Alene Press North Idaho 11-20-10

Coeur d'Alene Chamber of Commerce opposes EPA plan

Editor's Note: *The Coeur d'Alene Area Chamber of Commerce issued the following statement Friday on the Environmental Protection Agency's proposed amendment to the existing Record of Decision for the Upper Coeur d'Alene River Basin Cleanup*

It is our position that the proposed plan is undesirable for a number of reasons, these include the following:

1. The proposed ROD Amendment endangers existing and future mining, which in turn has dramatic negative impact on the strength of the local economy.

2. The proposal's length of implementation and costs are too long and too expensive, and does not fully consider the recommendation made by the National Academy of Science, and alternatives are available to achieve clean up which is both viable and affordable.

3. The proposal does not address water right adjudication of Basin 94.

1. It threatens the local and regional economy

The Silver Valley has great potential for economic growth. The area's existing mining and supporting services together with tourism, real estate, and other business sectors need to be viable today and into the future. The proposal does not guarantee future mining and the plan extends the "Superfund stigma". This stigma already threatens the economic health and growth in the Silver Valley, and the greater Coeur d'Alene area. The proposal will undoubtedly threaten the area for decades to come.

2. The proposal is too long and too costly

The proposed plan for cleanup in the Upper Coeur d'Alene River Basin would cost at least $1.3 billion in today's dollars and could mean that the EPA will be a dominant presence in the Valley for at least the next 50-90 years. With today's current economic challenges and uncertainty of the future this is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup. The EPA's proposal gives the agency far too much control over the future of the Silver Valley larger region that rely on the many economic and other benefits that mining and related industries provide. A viable proposal must ensure a healthy community and a strong local economy.

Additionally, a fundamental flaw of the EPA proposed amendment is that it ignores many of the key recommendations from the 2005 National Academy of Sciences review. The NAS recommended that any cleanup plan for the Upper Coeur d'Alene River Basin should do the following:

- Address the high priority historic mine site areas first , including Canyon and Nine Mile Creeks and the Box,
- Be data-driven, instead of relying on EPA's flawed predictive model,
- Focus on the achievement of actual data-driven measures of success, rather than on numerical standards, and
- Use an adaptive management approach which would address the cleanup in stages, evaluate progress and allow for the revision of goals and strategies based on effectiveness of actions taken over time.

Our review of EPA's proposed ROD amendment does not achieve any of these critical factors.

Furthermore, the EPA's proposed plan is being touted as a way to improve the health of the residents of the Silver Valley. In reality, only $3 million of the plan's $1.3 billion projected costs will be spent on new projects designed to protect human health. In fact, EPA's 2002 Record of compared, contrasted and then carefully considered and a reasonable compromised be reached as a viable option to achieve meaningful cleanup in the Silver Valley. It is our opinion that this ten-year plan outlines a sensible, data-driven approach to addressing the remaining cleanup needs in the Silver Valley. The cost of this plan ($150-175 million) can be funded by existing EPA resources. Most importantly, it will address historic mining sources in the Box and Upper Basin using proven technologies, provides for remedy protection, improves the fishery in the Upper Basin and provides for an important flood control study.

3. Basin 94 water adjudication

Water and water rights are critical to Idaho and each local community, including those in the Coeur d'Alene River Basin. The proposed plan ignores existing water rights now being adjudicated in Basin 94. The plan's lack of attention to this key issue will injure water rights and have an undetermined hydrological impact. The proposal must address water rights and their adjudication.

We believe that EPA's currently proposed course of action will 1) endanger existing and future mining, which in turn has dramatic negative impact on the strength of the local economy; 2) The proposal's length of implementation and costs are too long and too expensive, and does not fully consider the

No comments

It is our position that the proposed plan is undesirable for a number of reasons, these include the following:

1. The proposed ROD Amendment endangers existing and future mining, which in turn has dramatic negative impact on the strength of the local economy.

2. The proposal's length of implementation and costs are too long and too expensive, and does not fully consider the recommendation made by the National Academy of Science, and alternatives are available to achieve clean up which is both

nomic growth. The area's existing mining and supporting services together with tourism, real estate, and other business sectors need to be viable today and into the future. The proposal does not guarantee future mining and the plan extends the "Superfund stigma". This stigma already threatens the economic health and growth in the Silver Valley, and the greater Coeur d'Alene area. The proposal will undoubtedly threaten the area for decades to come.

2. The proposal is too long and too costly

The proposed plan for cleanup in the Upper Coeur d'Alene River Basin would cost at least $1.3 billion in today's dollars and could mean that the EPA will be a dominant presence in the Valley for at least the next 50-90 years. With today's current economic challenges and uncertainty of the future this is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

The EPA's proposal gives the agency far too much control over the future of the Silver Valley. This will disadvantage and complicate any future development in the region, particularly in regards to mining and mineral exploration. This is unacceptable to those who live and work in the Silver Valley and the

Services

All of

es"

that it ignores many of the key recommendations from the 2005 National Academy of Sciences review. The NAS recommended that any cleanup plan for the Upper Coeur d'Alene River Basin should do the following:

- Address the high priority historic mine site areas first , including Canyon and Nine Mile Creeks and the Box,
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- Focus on the achievement of actual data-driven measures of success, rather than on numerical standards, and
- Use an adaptive management approach which would address the cleanup in stages, evaluate progress and allow for the revision of goals and strategies based on effectiveness of actions taken over time.

Our review of EPA's proposed ROD amendment does not achieve any of these critical factors.

Furthermore, the EPA's proposed plan is being touted as a way to improve the health of the residents of the Silver Valley. In reality, only $3 million of the plan's $1.3 billion projected costs will be spent on new projects designed to protect human health. In fact, EPA's 2002 Record of Decision and the nearly-completed soil cleanup that EPA mandated as the "final" human health remedy were focused specifically on resolving the human health issues in the Silver Valley. A new, massive, multi-decade plan is not necessary.

With diligence to our policy to review different perspectives and viewpoints, it has come to our attention that an alternative ten-year plan is being proposed. We ask that this alternative 10-year plan be

cleanup needs in the Silv Valley. The cost of this plan ($150-175 million) can be funded by existing EPA resources. Most importantly, it will addres historic mining sources i the Box and Upper Basin using proven technologies, provides for remedy protection, improves the fishery in the Upper Basi and provides for an impor tant flood control study.

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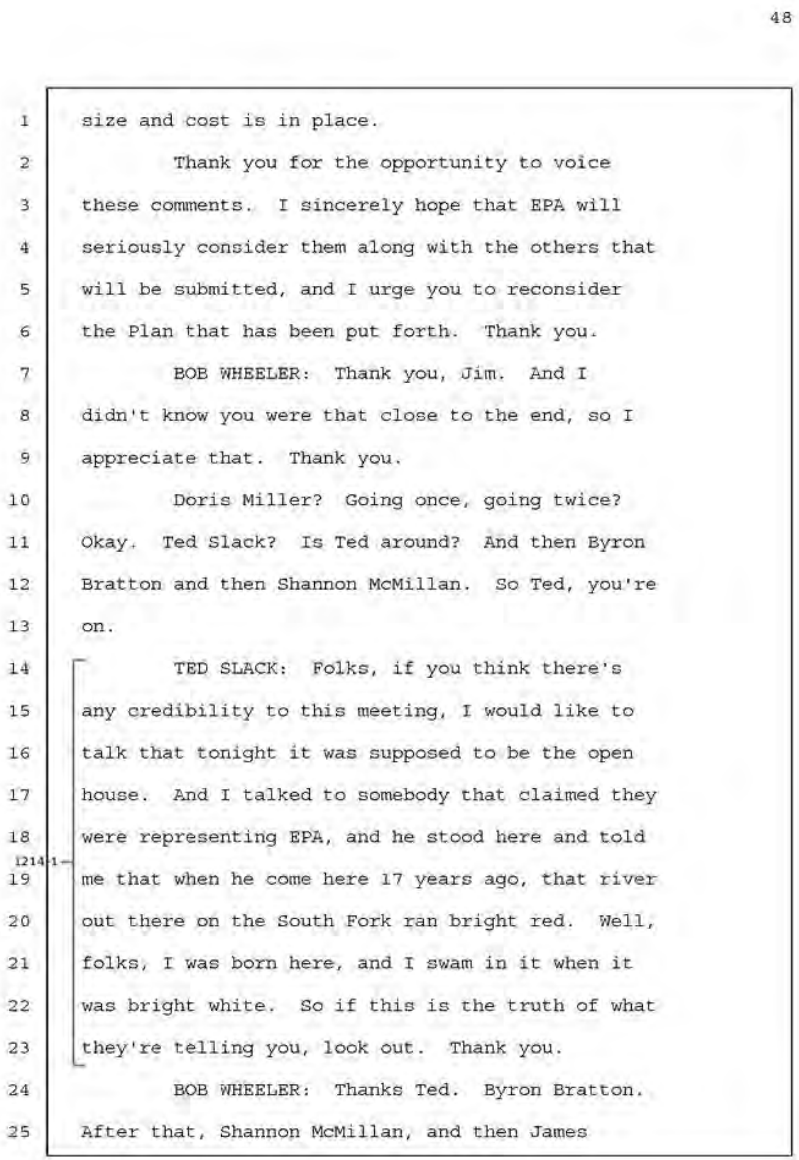
We believe that EPA's currently proposed course of action will 1) endanger existing and future mining, which in turn has dramatic negative impact on the strength of the local economy; 2)The proposal's length of implementation and costs are too long and too expensive, and does not fully consider the recommendation made by the National Academy of Science, and alternatives are available to achieve clean up which is both viable and affordable; and 3) The proposal does not address water right adjudication of Basin 94. As such, we urge the Environmental Protection Agency to withdraw the needlessly expensive, non-predictive, not science/results based, multi-decade plan, and instead adopt a focused and efficient 10-year plan.

No comments

Slack, Ted, I214, Letter 610097-9



48

size and cost is in place.

Thank you for the opportunity to voice these comments. I sincerely hope that EPA will seriously consider them along with the others that will be submitted, and I urge you to reconsider the Plan that has been put forth. Thank you.

BOB WHEELER: Thank you, Jim. And I didn't know you were that close to the end, so I appreciate that. Thank you.

Doris Miller? Going once, going twice? Okay. Ted Slack? Is Ted around? And then Byron Bratton and then Shannon McMillan. So Ted, you're on.

TED SLACK: Folks, if you think there's any credibility to this meeting, I would like to talk that tonight it was supposed to be the open house. And I talked to somebody that claimed they were representing EPA, and he stood here and told me that when he come here 17 years ago, that river out there on the South Fork ran bright red. Well, folks, I was born here, and I swam in it when it was bright white. So if this is the truth of what they're telling you, look out. Thank you.

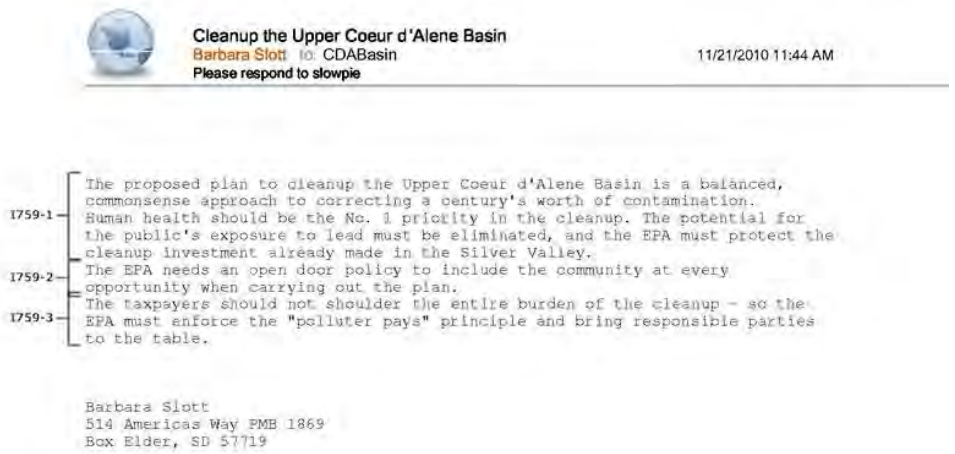
BOB WHEELER: Thanks Ted. Byron Bratton. After that, Shannon McMillan, and then James

I214-1

Response to comment I214-1

Thank you for your comment.

Slott, Barbara, I759, Letter 618757



Cleanup the Upper Coeur d'Alene Basin
Barbara Slott to: CDABasin 11/21/2010 11:44 AM
Please respond to slowpie

I759-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I759-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I759-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Barbara Slott
514 Americas Way PMB 1869
Box Elder, SD 57719

618757

Response to comment I759-1

See response to Comment No. I295-1.

Response to comment I759-2

See response to Comment No. I295-2.

Response to comment I759-3

See response to Comment No. I295-3.

Slusher, Ed, I760, Letter 618758

Ed Slusher
to:
CDABasin
11/20/2010 10:19 AM
Show Details

To whom it may concern,

I760-1 As a former resident who grew up in the Silver Valley and still a property owner I want to go on record AGAINST this further travesty of using more Federal funds to so call "Clean up the Silver Valley". I am now in my upper 70's and in fairly good health. Used to play along the lead creak that ran through the valley. Always kept clean afterwards.
This new travesty will further ruin the area for growth and production.

Ed Slusher
6859 W. Trevor St.
Rathdrum, ID 83858

618758

Response to comment I760-1

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. As described in the FFS, Proposed Plan and ROD Amendment, numerous studies over the years have documented these risks. The Selected Remedy is expected to make significant progress towards addressing these risks. Regarding the funding of the cleanup, see response to Comment No. I295-3.

Smith, Arthur, I908, Letter 616327

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
asmith@hecla-mining.com to formsubmission 11/15/2010 08:13 PM
Sent by: Asmith@Hecla-Mining.Com <asmith=hecla-mining.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

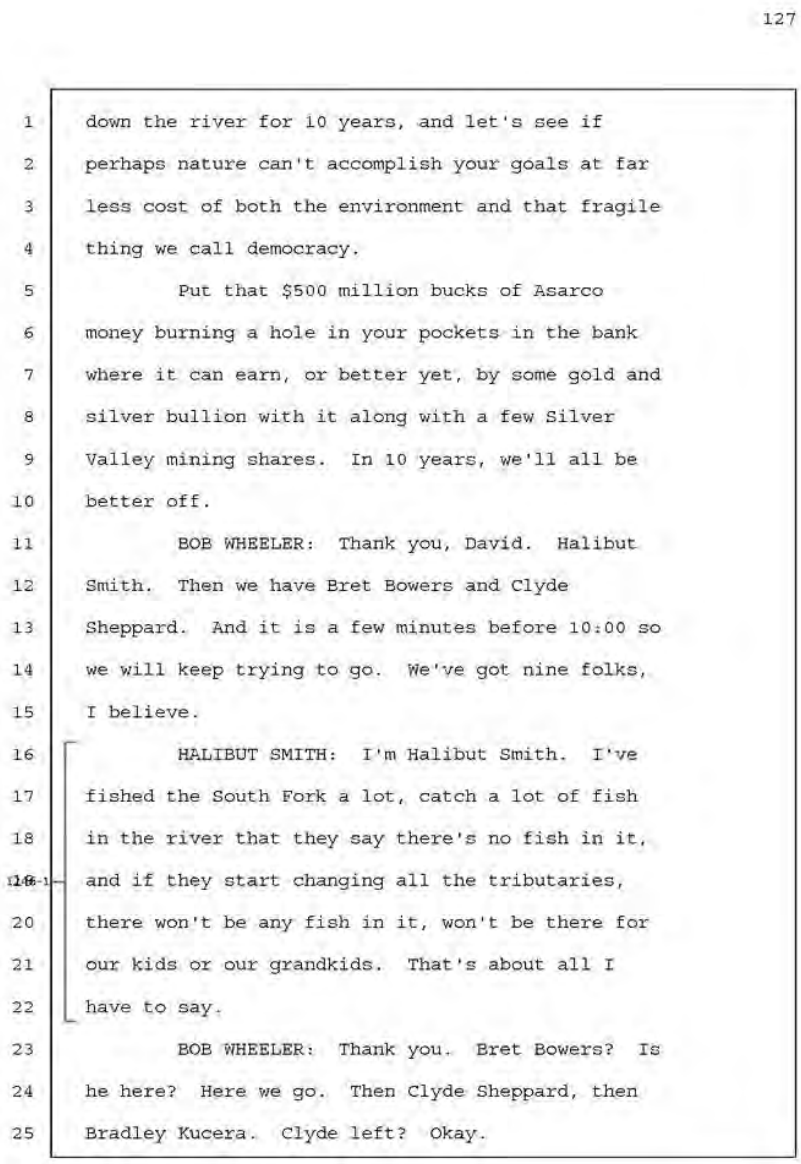
From: Arthur Smith
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I908-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: asmith@hecla-mining.com
Mailing Address: 3753 N. Margaux St.|Coeur d' Alene|ID|83815|US
Phone Number: (208) 665-7285

616327

Response to comment I908-1

See response to Comment No. I351-1.

Smith, Halibut, I246, Letter 610097-41



127

down the river for 10 years, and let's see if perhaps nature can't accomplish your goals at far less cost of both the environment and that fragile thing we call democracy.

Put that $500 million bucks of Asarco money burning a hole in your pockets in the bank where it can earn, or better yet, by some gold and silver bullion with it along with a few Silver Valley mining shares. In 10 years, we'll all be better off.

BOB WHEELER: Thank you, David. Halibut Smith. Then we have Bret Bowers and Clyde Sheppard. And it is a few minutes before 10:00 so we will keep trying to go. We've got nine folks, I believe.

HALIBUT SMITH: I'm Halibut Smith. I've fished the South Fork a lot, catch a lot of fish in the river that they say there's no fish in it, and if they start changing all the tributaries, there won't be any fish in it, won't be there for our kids or our grandkids. That's about all I have to say.

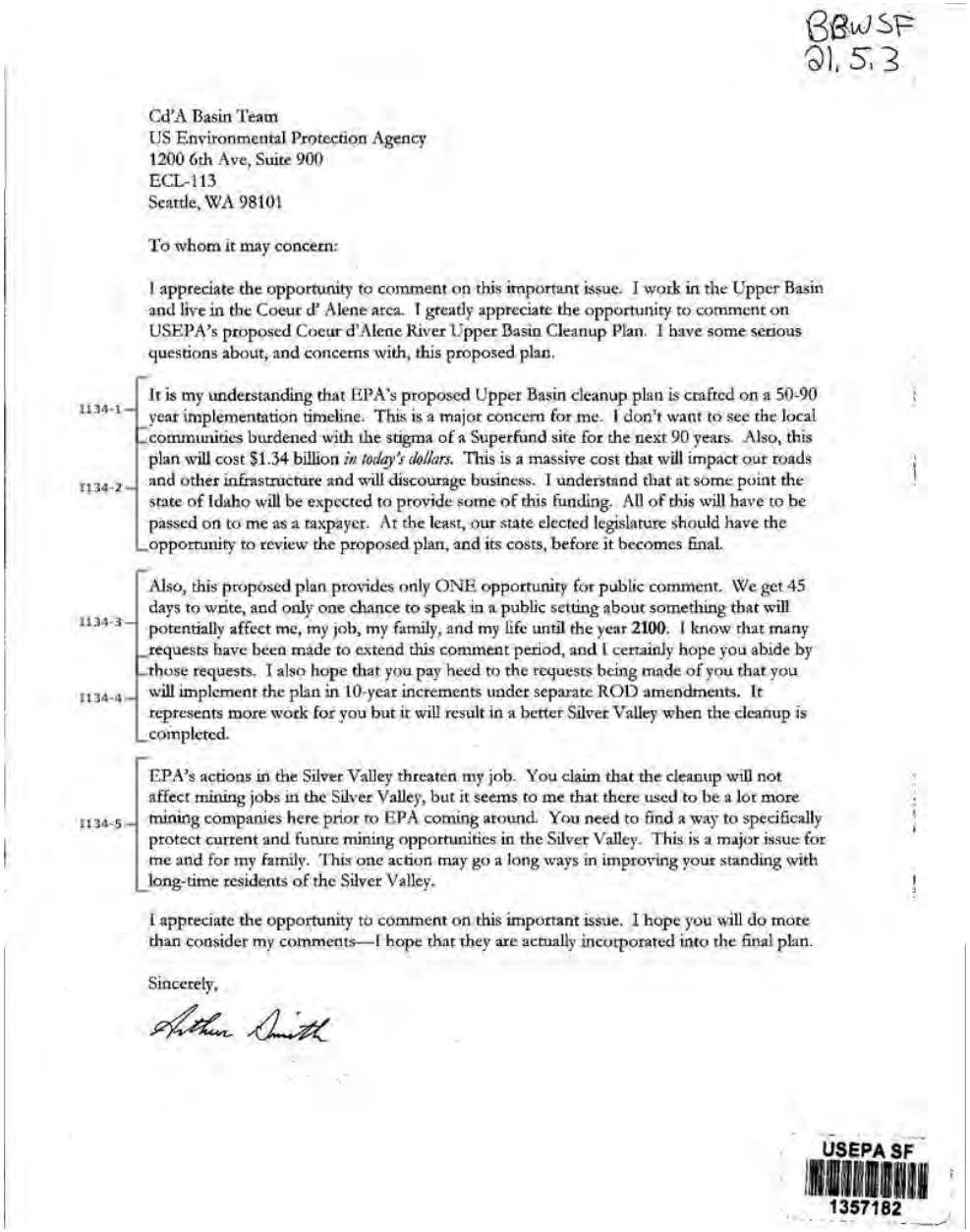
I246-1

BOB WHEELER: Thank you. Bret Bowers? Is he here? Here we go. Then Clyde Sheppard, then Bradley Kucera. Clyde left? Okay.

Response to comment I246-1

Thank you for your comment.

Smith, Arthur, I134, Letter 1357182



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. I work in the Upper Basin and live in the Coeur d' Alene area. I greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. I have some serious questions about, and concerns with, this proposed plan.

I134-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see the local communities burdened with the stigma of a Superfund site for the next 90 years. Also, this plan will cost $1.34 billion *in today's dollars.* This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I134-2

I134-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I134-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I134-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Arthur Smith

USEPA SF
1357182

Response to comment I134-1
See response to Comment No. I58-1.

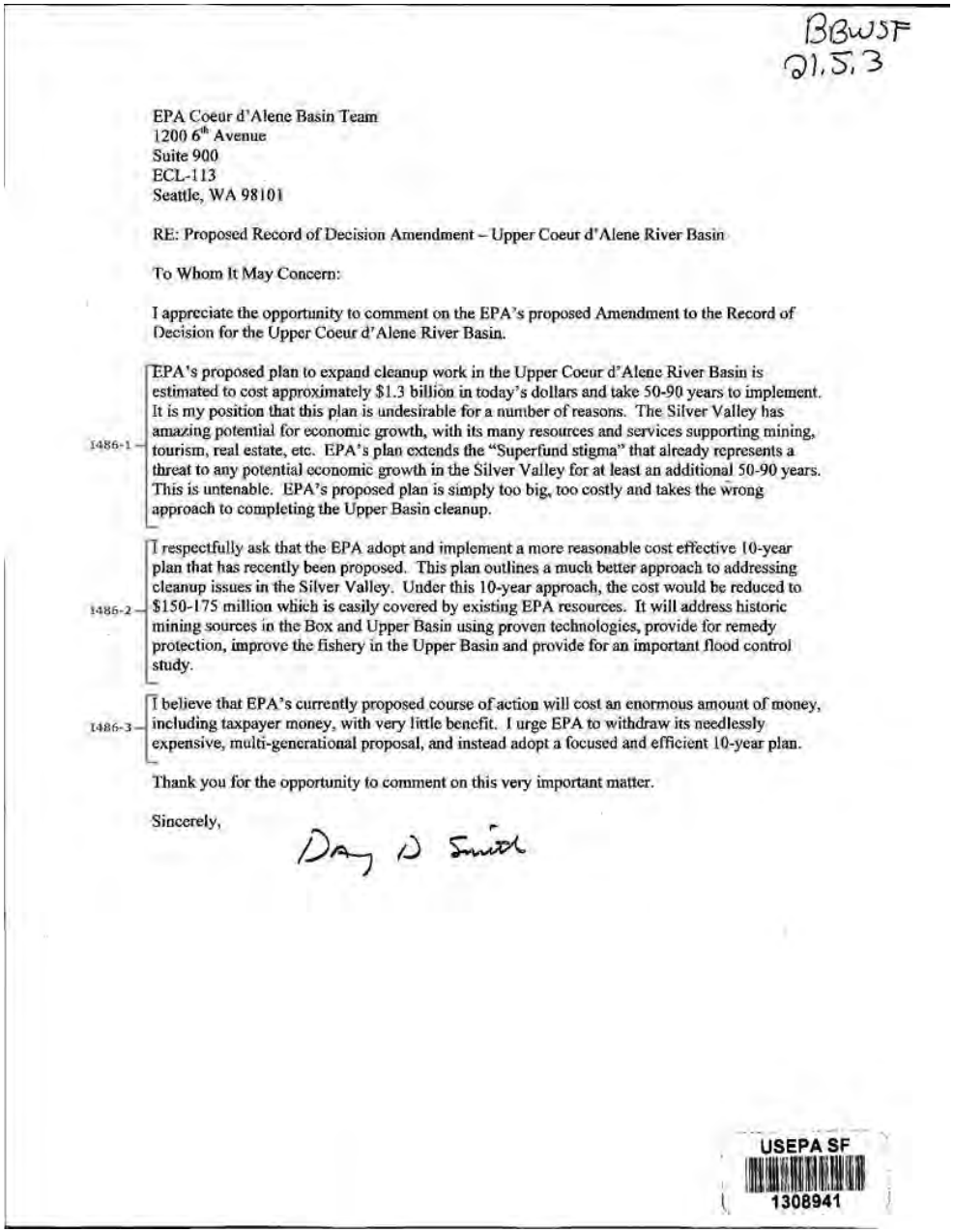
Response to comment I134-2
See response to Comment No. I58-2.

Response to comment I134-3
See response to Comment No. I58-3.

Response to comment I134-4
See response to Comment No. I58-4.

Response to comment I134-5
See response to Comment No. I58-5.

Smith, D., I486, Letter 1308941



BBWSF
9.1.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I486-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I486-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I486-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Day D Smith

USEPA SF
1308941

Response to comment I486-1

See response to Comment No. I474-1.

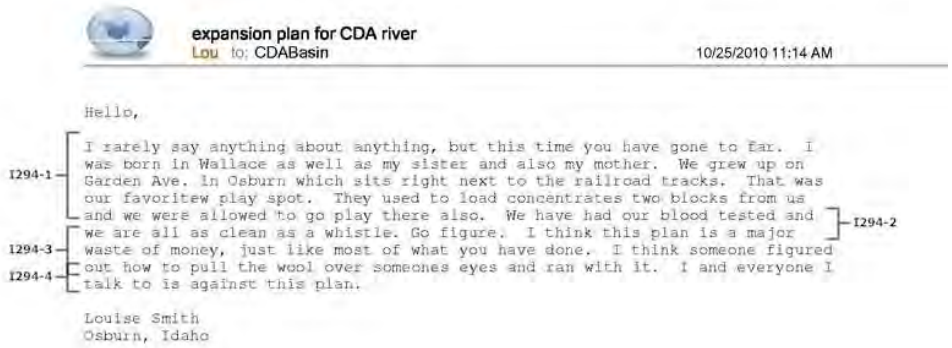
Response to comment I486-2

See response to Comment No. I474-2.

Response to comment I486-3

See response to Comment No. I474-3.

Smith, Louise, I294, Letter 614424



expansion plan for CDA river
Lou to: CDABasin 10/25/2010 11:14 AM

Hello,

I294-1 I rarely say anything about anything, but this time you have gone to far. I was born in Wallace as well as my sister and also my mother. We grew up on Garden Ave. In Osburn which sits right next to the railroad tracks. That was our favoritew play spot. They used to load concentrates two blocks from us and we were allowed to go play there also. We have had our blood tested and I294-2 we are all as clean as a whistle. Go figure. I think this plan is a major I294-3 waste of money, just like most of what you have done. I think someone figured I294-4 out how to pull the wool over someones eyes and ran with it. I and everyone I talk to is against this plan.

Louise Smith
Osburn, Idaho

614424

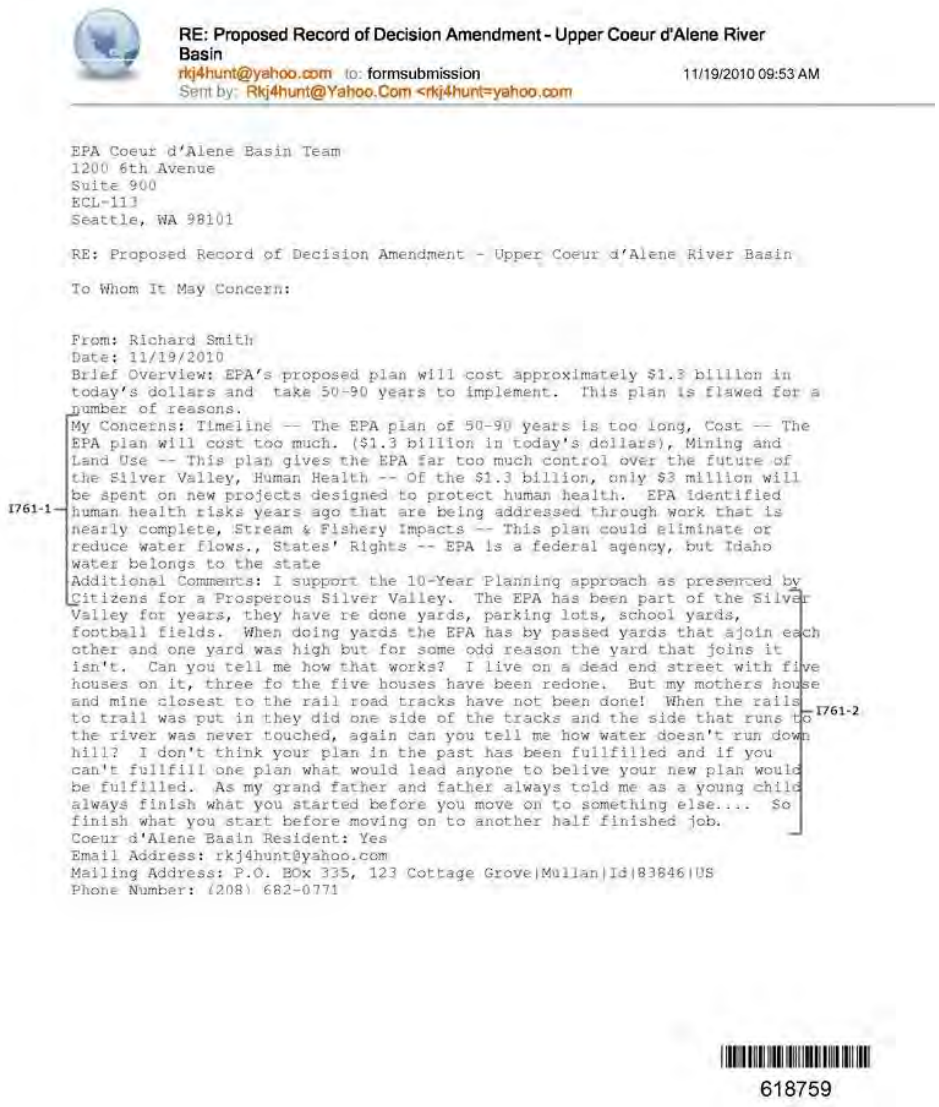
Response to comment I294-1
Thank you for your comment.

Response to comment I294-2
See response to Comment No. I295-1.

Response to comment I294-3
Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. See response to Comment No. I58-2.

Response to comment I294-4
Comment noted.

Smith, Richard, I761, Letter 618759



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
rkj4hunt@yahoo.com to: formsubmission 11/19/2010 09:53 AM
Sent by: Rkj4hunt@Yahoo.Com <rkj4hunt=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Richard Smith
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. The EPA has been part of the Silver Valley for years, they have re done yards, parking lots, school yards, football fields. When doing yards the EPA has by passed yards that ajoin each other and one yard was high but for some odd reason the yard that joins it isn't. Can you tell me how that works? I live on a dead end street with five houses on it, three fo the five houses have been redone. But my mothers house and mine closest to the rail road tracks have not been done! When the rails to trail was put in they did one side of the tracks and the side that runs to the river was never touched, again can you tell me how water doesn't run down hill? I don't think your plan in the past has been fullfilled and if you can't fullfill one plan what would lead anyone to belive your new plan would be fulfilled. As my grand father and father always told me as a young child always finish what you started before you move on to something else.... So finish what you start before moving on to another half finished job.
Coeur d'Alene Basin Resident: Yes
Email Address: rkj4hunt@yahoo.com
Mailing Address: P.O. BOx 335, 123 Cottage Grove|Mullan|Id|83846|US
Phone Number: (208) 682-0771

I761-1

I761-2

618759

Response to comment I761-1

See response to Comment No. I351-1.

Response to comment I761-2

EPA's goal is to complete clean up of yards within a given area on a similar timeframe. However properties with children and pregnant women remain a priority and are cleanup sooner than lower priority properties.

Sobering, Gordon, I762, Letter 618760

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
gordon.sobering@pincock.com to: formsubmission 11/17/2010 02:24 PM
Sent by: Gordon.Sobering@Pincock.Com <gordon.sobering=pincock.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Gordon Sobering
Date: 11/16/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: gordon.sobering@pincock.com
Mailing Address: 165 South Union Blvd., Suite 950|Denver|Colorado|80228|US
Phone Number:

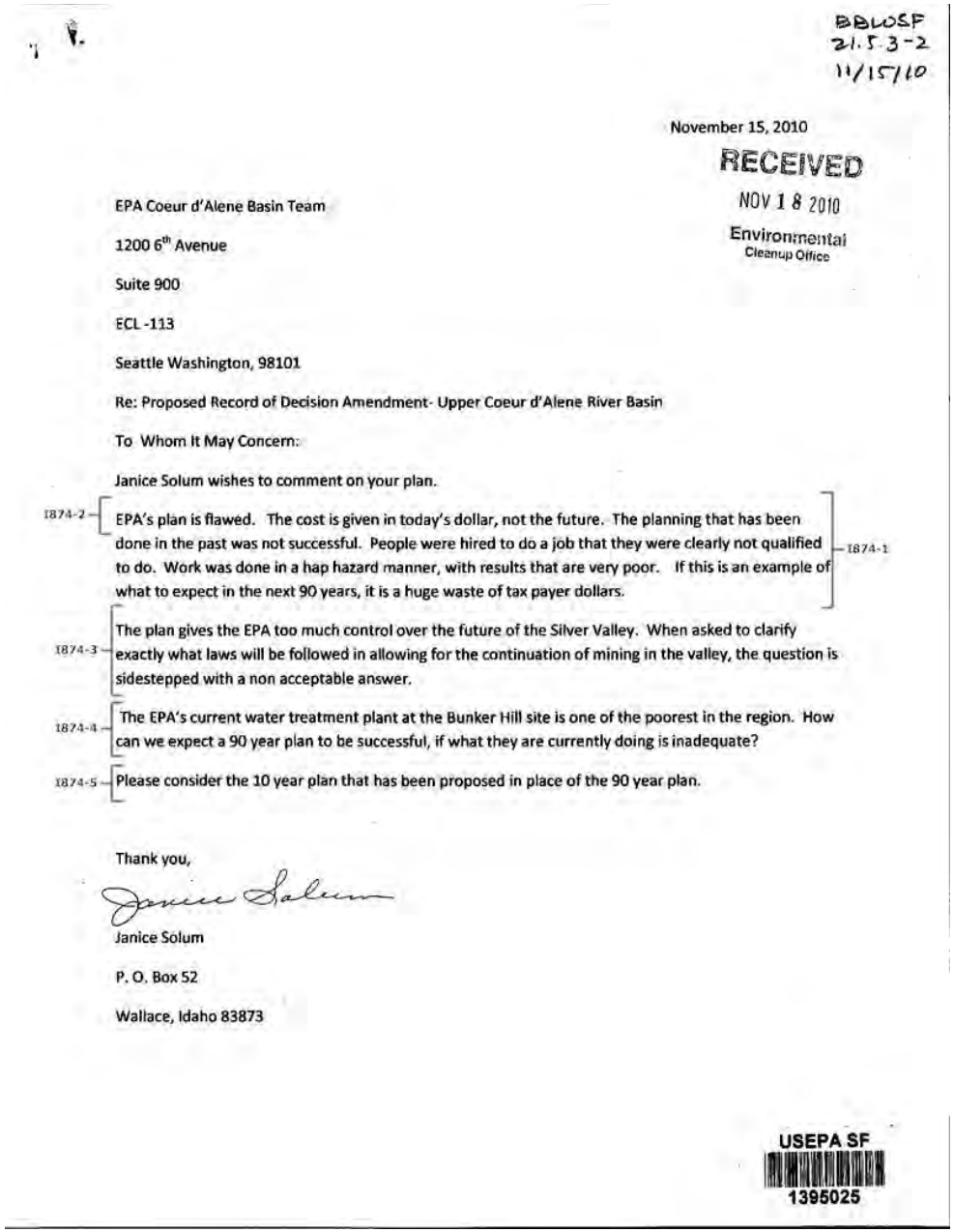
I762-1

618760

Response to comment I762-1

See response to Comment No. I351-1.

Solum, Janice, I874, Letter 1395025



BBLOSF
21.5.3-2
11/15/10

November 15, 2010

RECEIVED
NOV 18 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team

1200 6th Avenue

Suite 900

ECL -113

Seattle Washington, 98101

Re: Proposed Record of Decision Amendment- Upper Coeur d'Alene River Basin

To Whom It May Concern:

Janice Solum wishes to comment on your plan.

I874-2 — EPA's plan is flawed. The cost is given in today's dollar, not the future. The planning that has been done in the past was not successful. People were hired to do a job that they were clearly not qualified to do. Work was done in a hap hazard manner, with results that are very poor. If this is an example of what to expect in the next 90 years, it is a huge waste of tax payer dollars. — I874-1

I874-3 — The plan gives the EPA too much control over the future of the Silver Valley. When asked to clarify exactly what laws will be followed in allowing for the continuation of mining in the valley, the question is sidestepped with a non acceptable answer.

I874-4 — The EPA's current water treatment plant at the Bunker Hill site is one of the poorest in the region. How can we expect a 90 year plan to be successful, if what they are currently doing is inadequate?

I874-5 — Please consider the 10 year plan that has been proposed in place of the 90 year plan.

Thank you,

Janice Solum

Janice Solum

P. O. Box 52

Wallace, Idaho 83873

USEPA SF
1395025

Response to comment I874-1

See response to Comment No. I54-12 regarding EPA's cost estimate. See response to Comment No. I58-1 regarding EPA's plans for implementing the Selected Remedy.

Response to comment I874-2

See response to Comment No. I54-12.

Response to comment I874-3

See response to Comment No. I58-5.

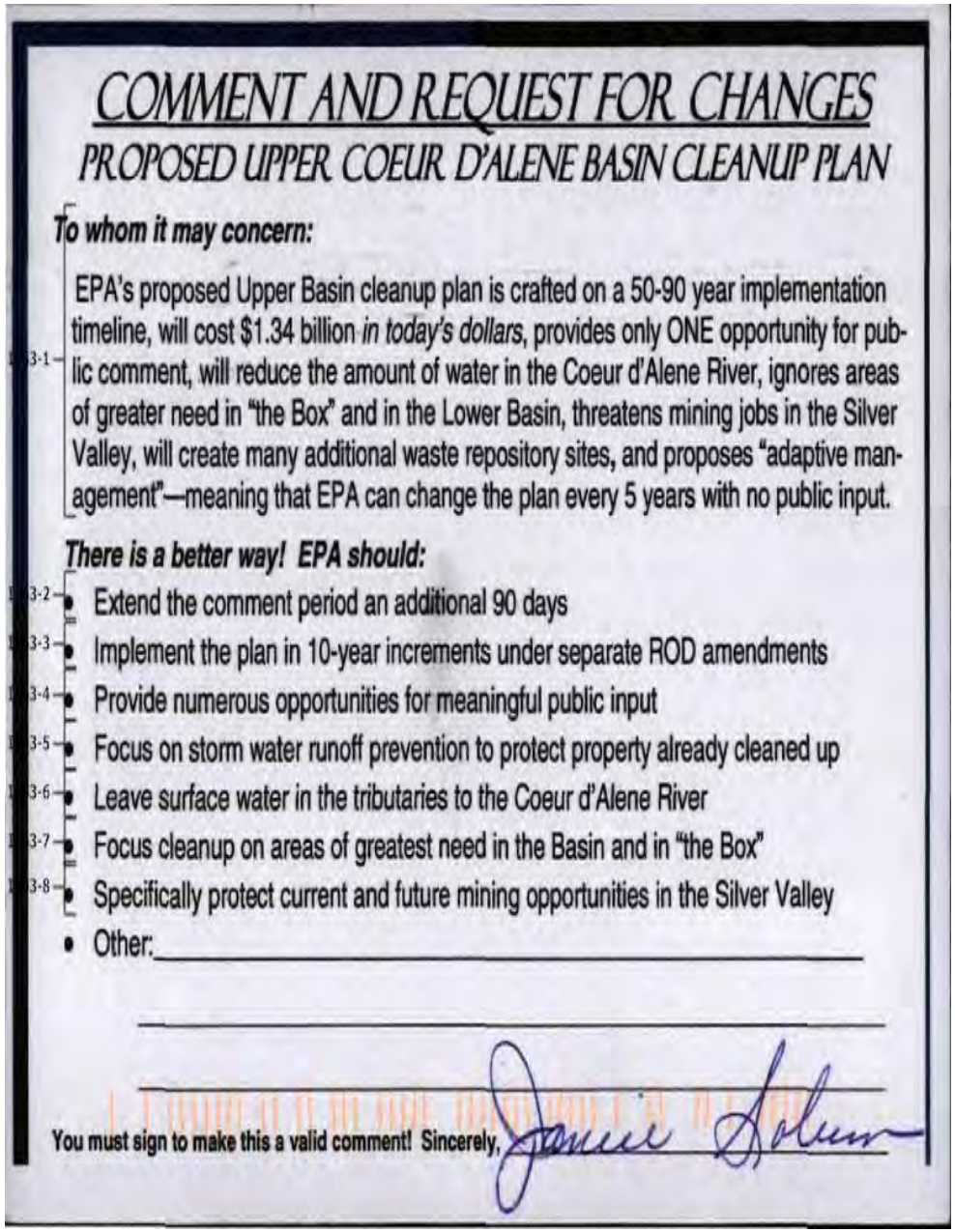
Response to comment I874-4

See response to Comment No. LC37-9.

Response to comment I874-5

See response to Comment No. I474-2.

Solum, Janice, I163, Letter 1357299



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I163-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I163-2 Extend the comment period an additional 90 days
- I163-3 Implement the plan in 10-year increments under separate ROD amendments
- I163-4 Provide numerous opportunities for meaningful public input
- I163-5 Focus on storm water runoff prevention to protect property already cleaned up
- I163-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I163-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I163-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely, Janice Solum

Response to comment I163-1
See response to Comment No. I25-1.

Response to comment I163-2
See response to Comment No. I25-2.

Response to comment I163-3
See response to Comment No. I25-3.

Response to comment I163-4
See response to Comment No. I25-4.

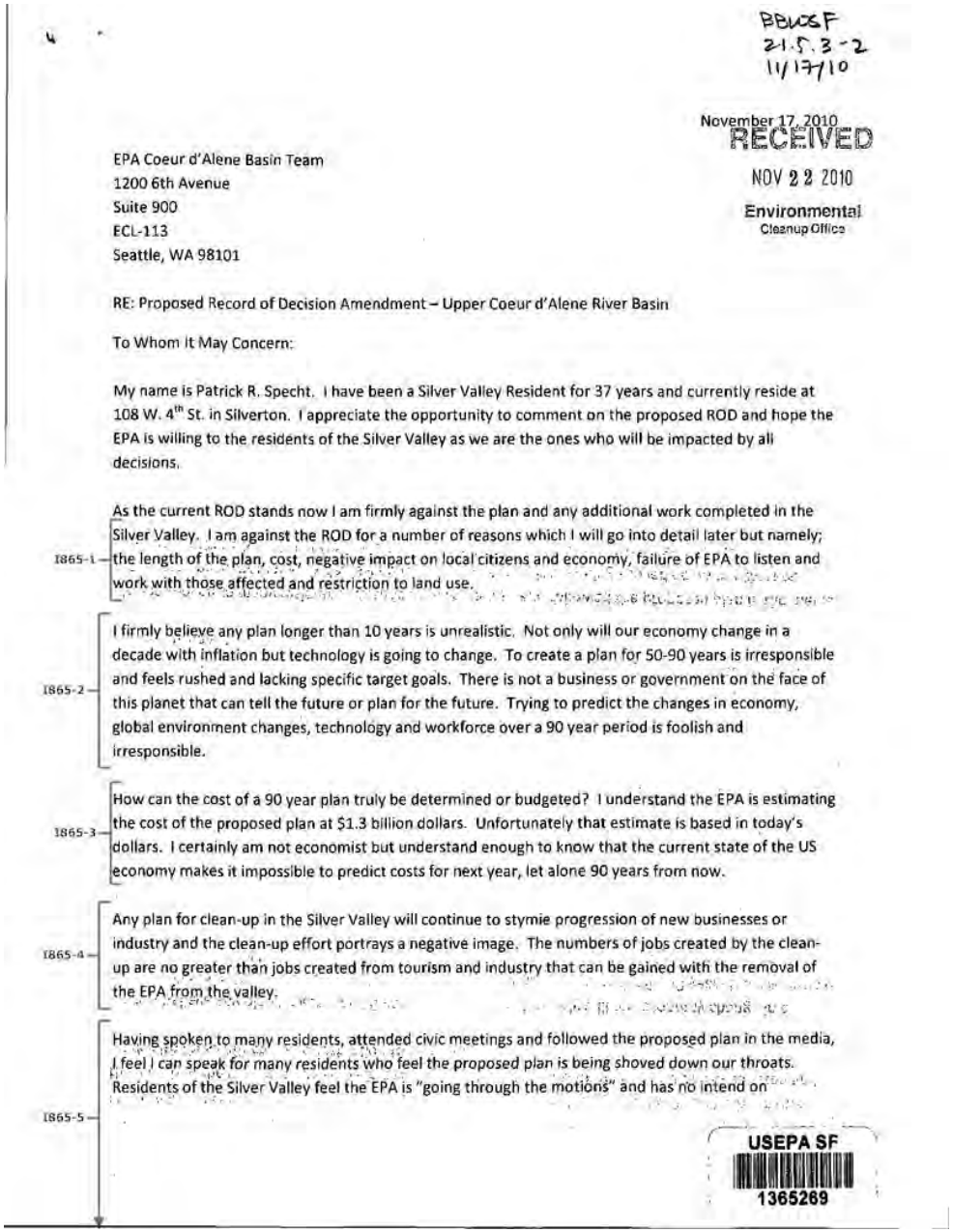
Response to comment I163-5
See response to Comment No. I25-5.

Response to comment I163-6
See response to Comment No. I25-6.

Response to comment I163-7
See response to Comment No. I25-7.

Response to comment I163-8
See response to Comment No. I25-8.

Specht, Patrick R., I865, Letter 1365269



BBUSF
21.5.3-2
11/17/10

November 17, 2010

RECEIVED
NOV 22 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom it May Concern:

My name is Patrick R. Specht. I have been a Silver Valley Resident for 37 years and currently reside at 108 W. 4th St. in Silverton. I appreciate the opportunity to comment on the proposed ROD and hope the EPA is willing to the residents of the Silver Valley as we are the ones who will be impacted by all decisions.

As the current ROD stands now I am firmly against the plan and any additional work completed in the Silver Valley. I am against the ROD for a number of reasons which I will go into detail later but namely; the length of the plan, cost, negative impact on local citizens and economy, failure of EPA to listen and work with those affected and restriction to land use. I865-1

I firmly believe any plan longer than 10 years is unrealistic. Not only will our economy change in a decade with inflation but technology is going to change. To create a plan for 50-90 years is irresponsible and feels rushed and lacking specific target goals. There is not a business or government on the face of this planet that can tell the future or plan for the future. Trying to predict the changes in economy, global environment changes, technology and workforce over a 90 year period is foolish and irresponsible. I865-2

How can the cost of a 90 year plan truly be determined or budgeted? I understand the EPA is estimating the cost of the proposed plan at $1.3 billion dollars. Unfortunately that estimate is based in today's dollars. I certainly am not economist but understand enough to know that the current state of the US economy makes it impossible to predict costs for next year, let alone 90 years from now. I865-3

Any plan for clean-up in the Silver Valley will continue to stymie progression of new businesses or industry and the clean-up effort portrays a negative image. The numbers of jobs created by the clean-up are no greater than jobs created from tourism and industry that can be gained with the removal of the EPA from the valley. I865-4

Having spoken to many residents, attended civic meetings and followed the proposed plan in the media, I feel I can speak for many residents who feel the proposed plan is being shoved down our throats. Residents of the Silver Valley feel the EPA is "going through the motions" and has no intend on I865-5

USEPA SF
1365269

Response to comment I865-1
Thank you for your comments.

Response to comment I865-2
See responses to Comment Nos. I58-1 and I58-4.

Response to comment I865-3
See response to Comment No. I54-12.

Response to comment I865-4
See response to Comment No. I54-2.

Response to comment I865-5
See response to Comment No. I295-2.

I865-5 considering the feelings and opinions of those who will be most affected. If the EPA truly cares about the citizens of the Silver Valley the proposed plan would be stopped and a 10 year plan based on actual data, would cost $150-$175 million and respect private property and water rights would be adopted. I865-6

I865-7 In addition to the residents of the Silver Valley speaking against the proposed ROD, Butch Otter, the governor of Idaho along with state representatives and legislators have spoken out against the proposed plan. Is the EPA planning on ignoring them as well?

I865-8 The proposed clean-up focuses significantly on improving water quality. Idaho's waters belong to the state; any clean-up of Idaho's waterways should thusly be a state matter, not a federal matter. Not to mention the fact all drinking water in the valley is supplied from sources up stream of any proposed clean-up.

I865-9 In conclusion, I am not against the EPA but in favor of a plan that has specific objectives to be met in a timely and realistic timeframe, is focused on data, and is supported by the citizens of the Silver Valley. I believe most residents are in favor of a 10 year plan, I am. I am firmly against the proposed 90 year plan and the current tactics the EPA is utilizing to initiate a plan that is too costly, ill planned, goes against recommendations of National Academy of Sciences and does not take into consideration the opinion and wishes of those who will be most affected.

Sincerely,

Patrick R. Specht

Patrick R. Specht
PO Box 341
Silverton, ID 83867
208-556-0844
Pat.specht@kelloggschools.org

Response to comment I865-6

See response to Comment No. I474-2.

Response to comment I865-7

See responses to Comment Nos. LJ39-5 and I295-1.

Response to comment I865-8

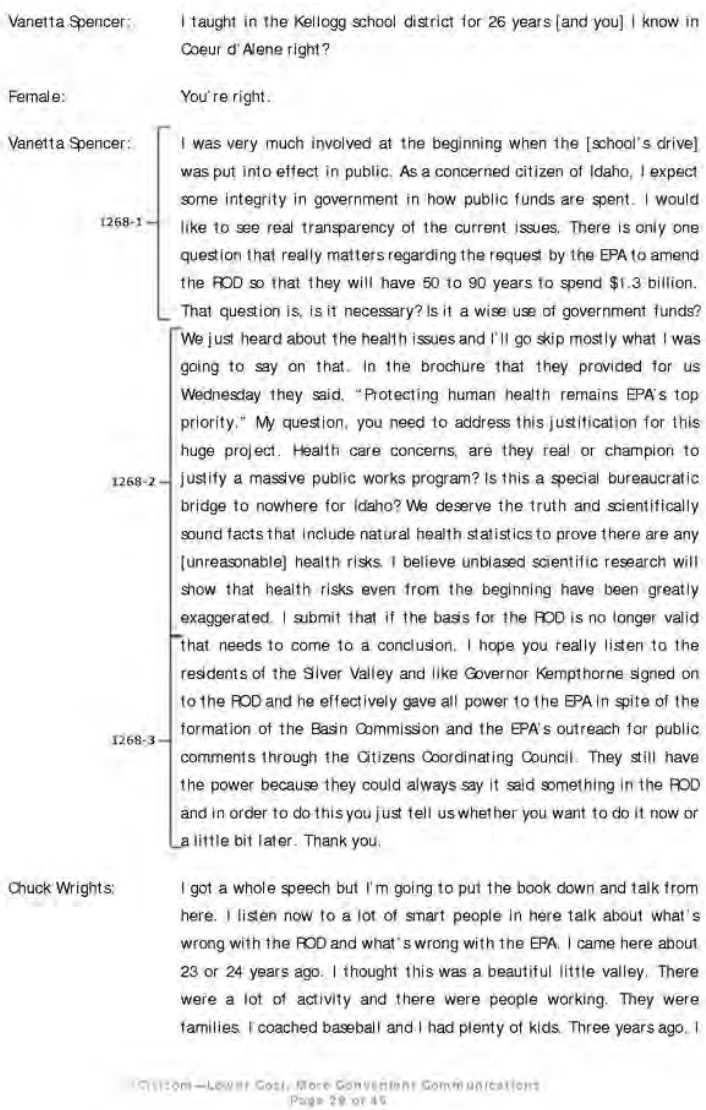
Under the Superfund law, EPA has a responsibility and the authority to take actions to protect human health and the environment. CERCLA specifically provides EPA with authority to address risks posed by contaminated surface water and groundwater. EPA's decision making process has been a careful and collaborative effort, which included input from state and local governments, tribes, other federal agencies, the Basin Commission, and the public. See response to Comment No. SA4-12 regarding water rights.

Response to comment I865-9

With regard to the 10-year plan, see response to Comment No. I474-2. With regard to cost, see response to Comment No. I58-2. With regard to the National Academy of Sciences (National Academy of Sciences, 2005, http://www.epa.gov/superfund/accomp/coeur/), their report's conclusions and recommendations cover the remedial investigation, human health risk assessment, and ecological risk assessment of the Coeur d'Alene Basin, and remediation objectives and approaches. Many of the recommendations relate to EPA's approach to protection of the environment presented in the 2002 ROD for OU 3 (EPA, 2002; www.epa.gov/superfund/sites/rods/fulltext/r1002032.pdf) and the 2001 Feasibility Study (FS) Report (EPA, October 2001, *Final [Revision 2] Feasibility Study Report, Coeur d'Alene Basin Remedial Investigation/Feasibility Study*). The NAS review validated much of the 2002 ROD for OU 3, and the recommendations for areas of improvement primarily focused on ecological protection. EPA carefully considered the NAS report and its recommendations, and conducted studies and evaluations to address the major recommendations. The results of those efforts are reflected in the actions identified in the Upper Basin Selected Remedy. EPA believes the Selected Remedy presented in the ROD Amendment addresses the NAS report's recommendations, while recognizing EPA's statutory obligations under CERCLA. Since the ROD for OU 3 was issued in

2002 and the NAS report in 2005, EPA has continued to collect environmental data and conduct studies throughout the Coeur d'Alene Basin, particularly in the Upper Basin. The additional data and studies have improved EPA's understanding of the Upper Basin, and enabled EPA to address key NAS recommendations involving the fate and transport of dissolved metals in the subsurface; the role that groundwater plays in contaminant loading to surface water; approaches to groundwater treatment; the development of predictive tools to assess the effectiveness of remedial actions; evaluation of the SFCDR Watershed as a whole, including the Bunker Hill Box; and improving the use of the adaptive management approach.

Spencer, Vanetta, I268, Letter 616015-32



Vanetta Spencer: I taught in the Kellogg school district for 26 years [and you] I know in Coeur d' Alene right?

Female: You're right.

Vanetta Spencer: I was very much involved at the beginning when the [school's drive] was put into effect in public. As a concerned citizen of Idaho, I expect some integrity in government in how public funds are spent. I would like to see real transparency of the current issues. There is only one question that really matters regarding the request by the EPA to amend the ROD so that they will have 50 to 90 years to spend $1.3 billion. That question is, is it necessary? Is it a wise use of government funds? I268-1

We just heard about the health issues and I'll go skip mostly what I was going to say on that. In the brochure that they provided for us Wednesday they said, "Protecting human health remains EPA's top priority." My question, you need to address this justification for this huge project. Health care concerns, are they real or champion to justify a massive public works program? Is this a special bureaucratic bridge to nowhere for Idaho? We deserve the truth and scientifically sound facts that include natural health statistics to prove there are any [unreasonable] health risks. I believe unbiased scientific research will show that health risks even from the beginning have been greatly exaggerated. I submit that if the basis for the ROD is no longer valid that needs to come to a conclusion. I hope you really listen to the residents of the Silver Valley and like Governor Kempthorne signed on to the ROD and he effectively gave all power to the EPA in spite of the formation of the Basin Commission and the EPA's outreach for public comments through the Citizens Coordinating Council. They still have the power because they could always say it said something in the ROD and in order to do this you just tell us whether you want to do it now or a little bit later. Thank you. I268-2 I268-3

Chuck Wrights: I got a whole speech but I'm going to put the book down and talk from here. I listen now to a lot of smart people in here talk about what's wrong with the ROD and what's wrong with the EPA. I came here about 23 or 24 years ago. I thought this was a beautiful little valley. There were a lot of activity and there were people working. They were families. I coached baseball and I had plenty of kids. Three years ago, I

Citizen—Lower Cost, More Convenient Communications
Page 29 of 46

Response to comment I268-1

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I268-2

See response to Comment No. I295-1.

Response to comment I268-3

Comment noted.

Spencer, Vinetta, I225, Letter 610097-20

about someone playing golf where they worked.

Since all of my classmates -- and we graduated 60 years ago -- lived during the smelter smoke, we should be an example for you to follow. If we are supposed to be retarded, we are some of the smartest you've ever known.

Why don't you start to live like we did? You would walk to school, wash your hands, drink milk, and go one day a week to the Bunker Hill solarium and ride Emery's big blue bus.

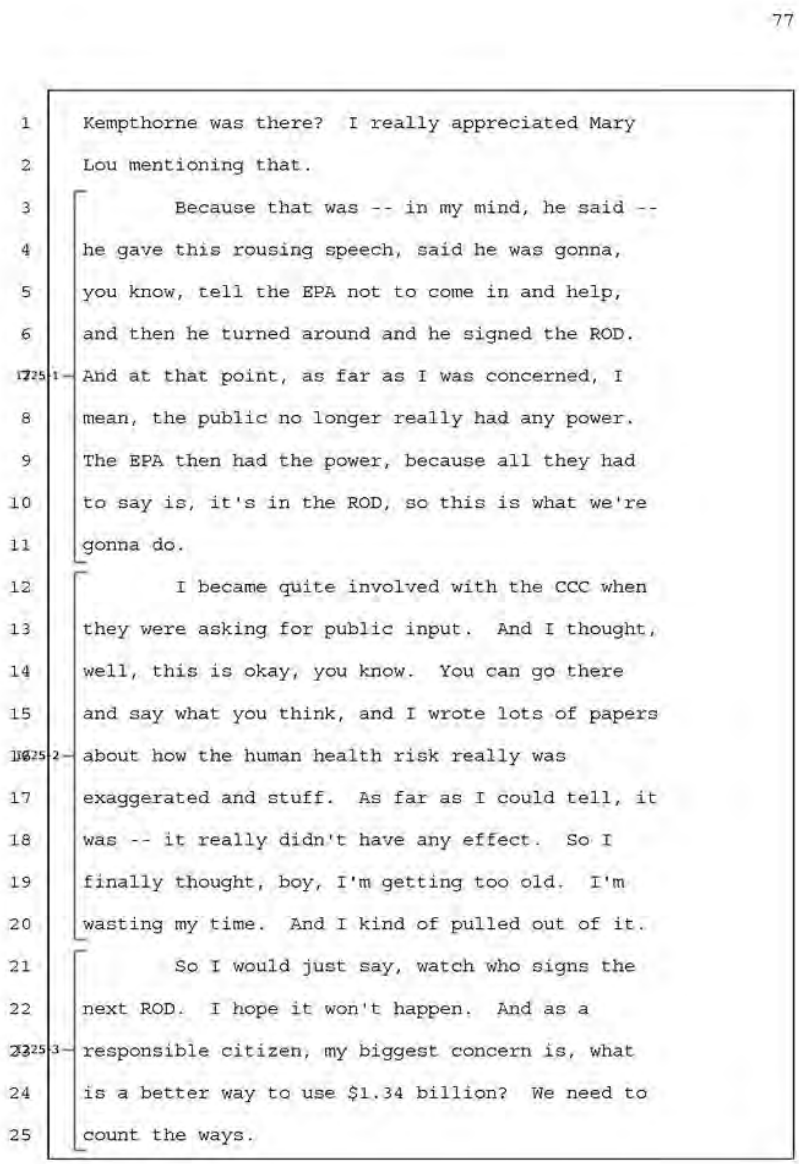
Now, if you were one of my students and you hurt any of my students, I'd whip your bottom real good -- and I canceled the words I wanted to say.

And by the way, here's one of those retarded classmates of mine. This is Noel Penny Emerett (phonetic); he only owns a space company in Washington, D.C.

BOB WHEELER: Thank you. And Vinetta Ruth Spencer and Terry and Mike.

VINETTA SPENCER: Hard act to follow. I'm really proud of a lot of the things that have been said here, and my one comment was, I was curious, how many were at that Wallace meeting -- I don't know, was it 2001, 2002 -- where Governor

No comments



77

Kempthorne was there? I really appreciated Mary Lou mentioning that.

Because that was -- in my mind, he said -- he gave this rousing speech, said he was gonna, you know, tell the EPA not to come in and help, and then he turned around and he signed the ROD. I725-1 And at that point, as far as I was concerned, I mean, the public no longer really had any power. The EPA then had the power, because all they had to say is, it's in the ROD, so this is what we're gonna do.

I became quite involved with the CCC when they were asking for public input. And I thought, well, this is okay, you know. You can go there and say what you think, and I wrote lots of papers I725-2 about how the human health risk really was exaggerated and stuff. As far as I could tell, it was -- it really didn't have any effect. So I finally thought, boy, I'm getting too old. I'm wasting my time. And I kind of pulled out of it.

So I would just say, watch who signs the next ROD. I hope it won't happen. And as a I725-3 responsible citizen, my biggest concern is, what is a better way to use $1.34 billion? We need to count the ways.

Response to comment I225-1

See response to Comment No. I295-2.

Response to comment I225-2

See response to Comment No. I295-1.

Response to comment I225-3

See response to Comment No. I58-2.

Spencer, Vinetta Ruth, I425, Letter 616329

Comment-EPA's proposed expansion of ROD
VINETTA SPENCER
to:
CDABasin
11/12/2010 08:37 AM
Show Details

I425-1 — I am opposed to the EPA's proposed ROD. I have submitted my comments and position many times over the years. I continue to believe the proposals need to be based on health risks for which I see no valid documentation.
Sincerely, Vinetta Ruth Spencer-1380 E. Elderberry Circle, CDA. ID 83815

616329

Response to comment I425-1

See response to Comment No. I295-1.

Spencer, Vinetta Ruth, I20, Letter 896744

Proposed 1.34 Billion plan
VINETTA SPENCER
to:
CDABasin
08/01/2010 09:08 PM
Show Details

I20-1 — You will not like my comments. I believe the plan is preposterous and unnecessary. I hope there will be enough pressure to change this plan before it becomes a ROD. I do not have any faith that the public comments will make a difference as I was involved in public meetings and the CCC when the first ROD to expand the Superfund site was instituted.

I20-2 — I think it is deplorable to ask parents to have their kid's blood levels checked to justify the position of the EPA that there is a public health danger. Use actual health statistics, not hypothetical theories of danger. Vinetta R. Spencer

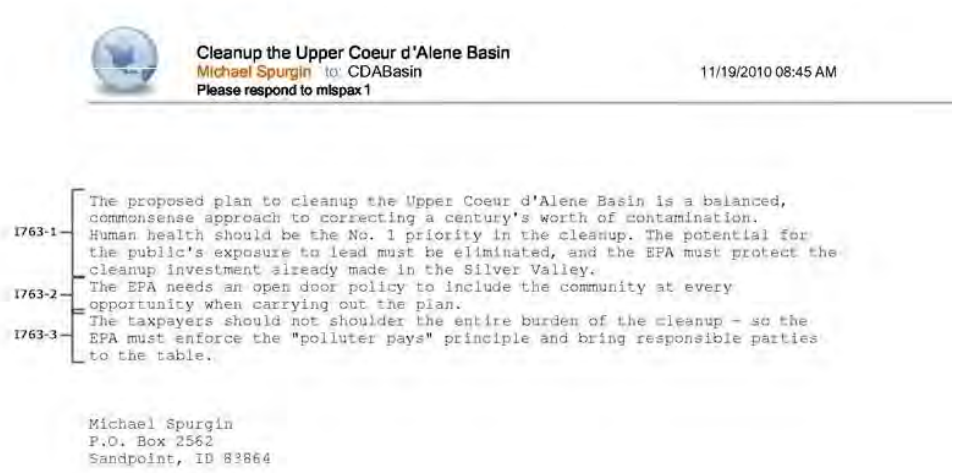
Response to comment I20-1

See responses to Comment Nos. I 295-1, I295-2, and I58-1.

Response to comment I20-2

See response to Comment No. I295-1.

Spurgin, Michael, I763, Letter 618761



Cleanup the Upper Coeur d'Alene Basin
Michael Spurgin to: CDABasin 11/19/2010 08:45 AM
Please respond to mlspax1

I763-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I763-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I763-3 The taxpayers should not shoulder the entire burden of the cleanup - so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Michael Spurgin
P.O. Box 2562
Sandpoint, ID 83864

618761

Response to comment I763-1

See response to Comment No. I295-1.

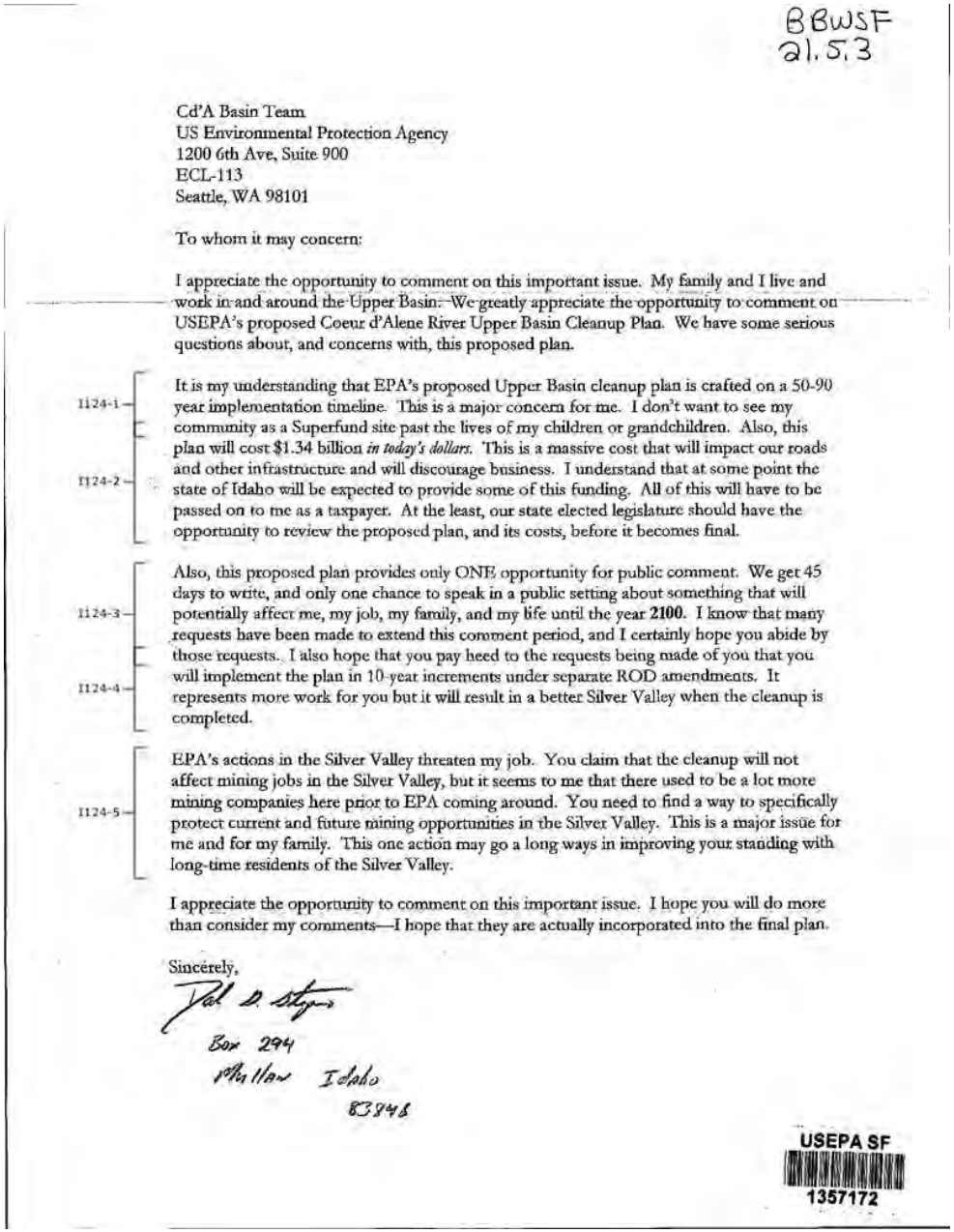
Response to comment I763-2

See response to Comment No. I295-2.

Response to comment I763-3

See response to Comment No. I295-3.

Stagmo, Dan, I124, Letter 1357172



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I124-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I124-2 — plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I124-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I124-4 — will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I124-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Dal D. Stagmo
Box 294
Mullan Idaho
83846

USEPA SF
1357172

Response to comment I124-1
See response to Comment No. I58-1.

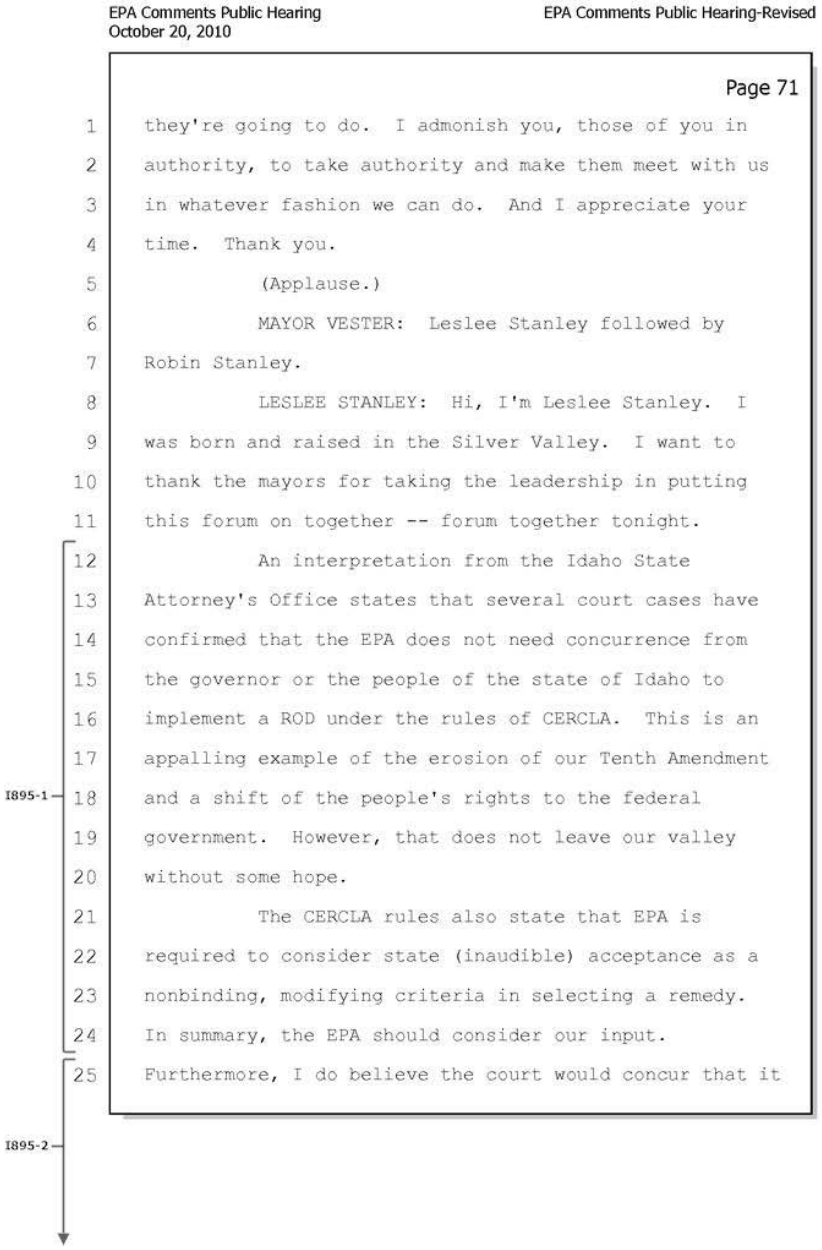
Response to comment I124-2
See response to Comment No. I58-2.

Response to comment I124-3
See response to Comment No. I58-3.

Response to comment I124-4
See response to Comment No. I58-4.

Response to comment I124-5
See response to Comment No. I58-5.

Stanley, Leslee, I895, Letter 619651-28



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

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they're going to do. I admonish you, those of you in authority, to take authority and make them meet with us in whatever fashion we can do. And I appreciate your time. Thank you.

(Applause.)

MAYOR VESTER: Leslee Stanley followed by Robin Stanley.

LESLEE STANLEY: Hi, I'm Leslee Stanley. I was born and raised in the Silver Valley. I want to thank the mayors for taking the leadership in putting this forum on together -- forum together tonight.

An interpretation from the Idaho State Attorney's Office states that several court cases have confirmed that the EPA does not need concurrence from the governor or the people of the state of Idaho to implement a ROD under the rules of CERCLA. This is an appalling example of the erosion of our Tenth Amendment and a shift of the people's rights to the federal government. However, that does not leave our valley without some hope.

The CERCLA rules also state that EPA is required to consider state (inaudible) acceptance as a nonbinding, modifying criteria in selecting a remedy. In summary, the EPA should consider our input. Furthermore, I do believe the court would concur that it

I895-1

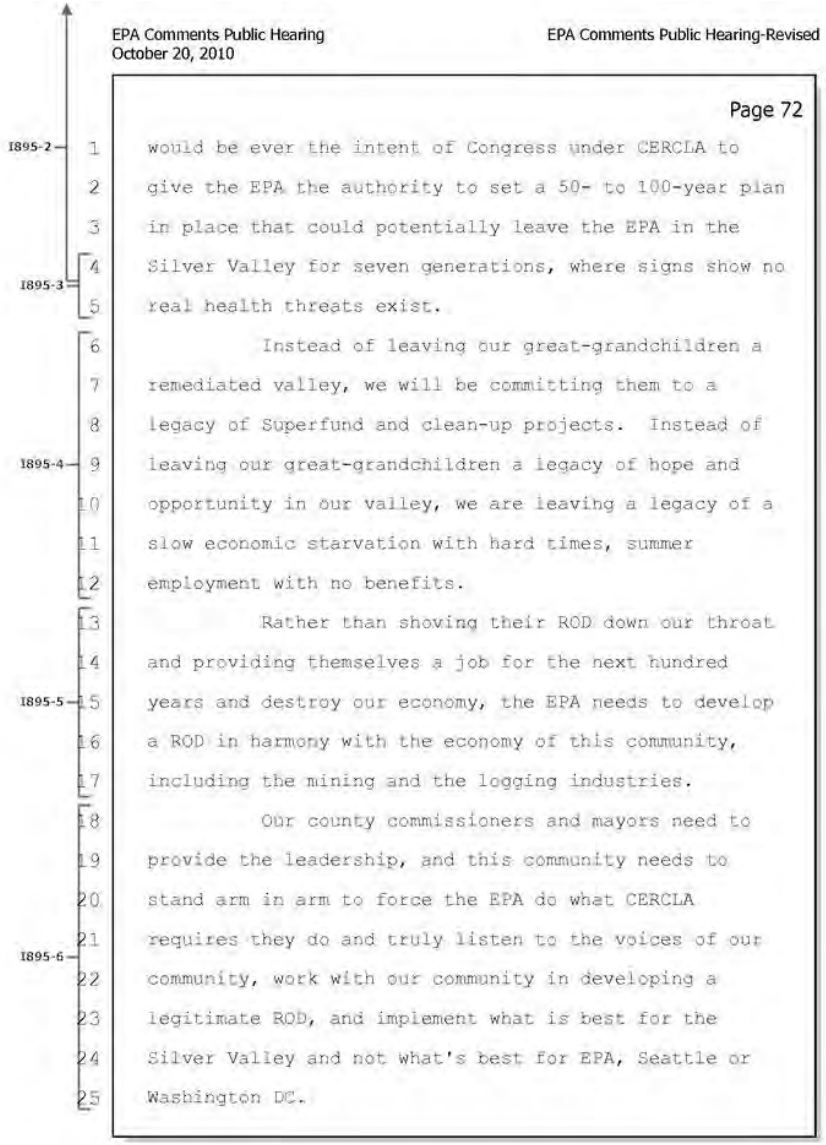
I895-2

Response to comment I895-1

EPA is not aware of any Federal Court decisions suggesting or determining that CERCA's remedy selection process violates the 10th Amendment. See response to Comment No. I295-2.

Response to comment I895-2

See response to Comment No. I58-1.



EPA Comments Public Hearing
October 20, 2010

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I895-2
would be ever the intent of Congress under CERCLA to give the EPA the authority to set a 50- to 100-year plan in place that could potentially leave the EPA in the Silver Valley for seven generations, where signs show no
I895-3
real health threats exist.

Instead of leaving our great-grandchildren a remediated valley, we will be committing them to a legacy of Superfund and clean-up projects. Instead of
I895-4
leaving our great-grandchildren a legacy of hope and opportunity in our valley, we are leaving a legacy of a slow economic starvation with hard times, summer employment with no benefits.

Rather than shoving their ROD down our throat and providing themselves a job for the next hundred
I895-5
years and destroy our economy, the EPA needs to develop a ROD in harmony with the economy of this community, including the mining and the logging industries.

Our county commissioners and mayors need to provide the leadership, and this community needs to stand arm in arm to force the EPA do what CERCLA
I895-6
requires they do and truly listen to the voices of our community, work with our community in developing a legitimate ROD, and implement what is best for the Silver Valley and not what's best for EPA, Seattle or Washington DC.

Response to comment I895-3

See response to Comment No. I295-1.

Response to comment I895-4

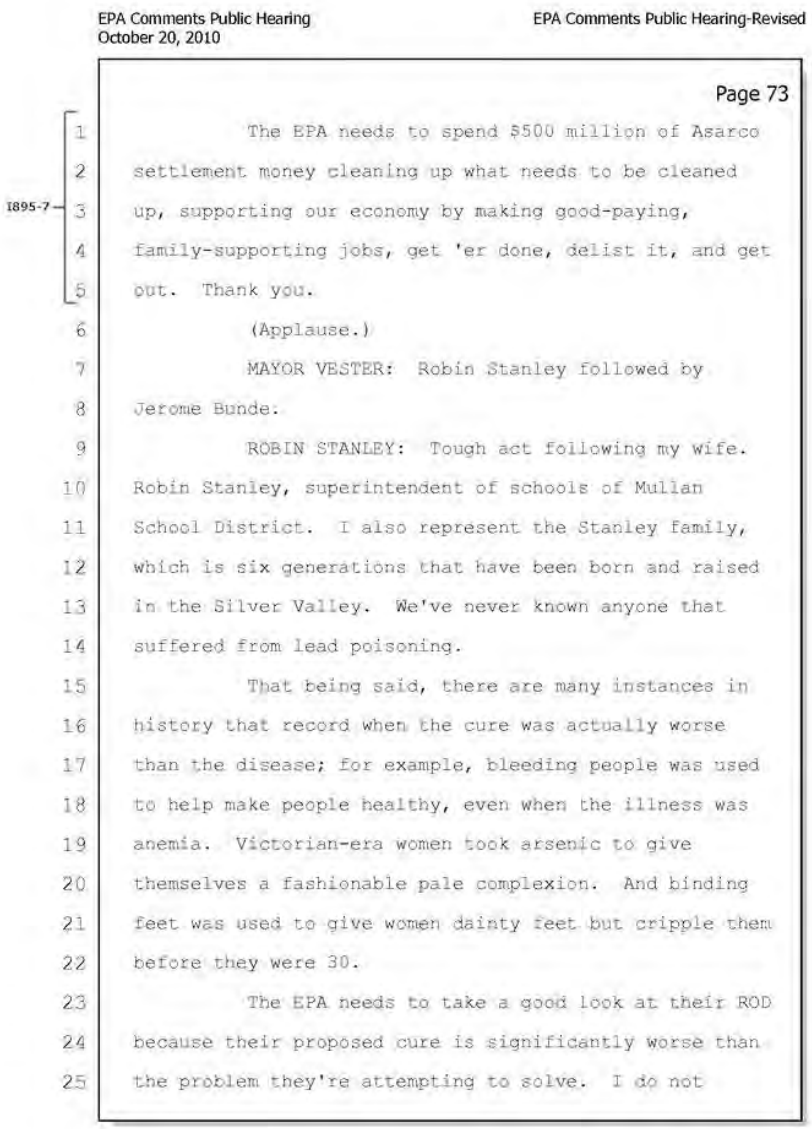
See responses to Comment Nos. I474-1 and LC32-2.

Response to comment I895-5

EPA is committed to working with the mining industry and Silver Valley businesses and landowners to conduct the cleanup in ways that are consistent with the current and future land uses desired by the community. See response to Comment No. I58-5.

Response to comment I895-6

See responses to Comment Nos. I295-2 and LJ39-5.



EPA Comments Public Hearing
October 20, 2010

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I895-7

The EPA needs to spend $500 million of Asarco settlement money cleaning up what needs to be cleaned up, supporting our economy by making good-paying, family-supporting jobs, get 'er done, delist it, and get out. Thank you.

(Applause.)

MAYOR VESTER: Robin Stanley followed by Jerome Bunde.

ROBIN STANLEY: Tough act following my wife. Robin Stanley, superintendent of schools of Mullan School District. I also represent the Stanley family, which is six generations that have been born and raised in the Silver Valley. We've never known anyone that suffered from lead poisoning.

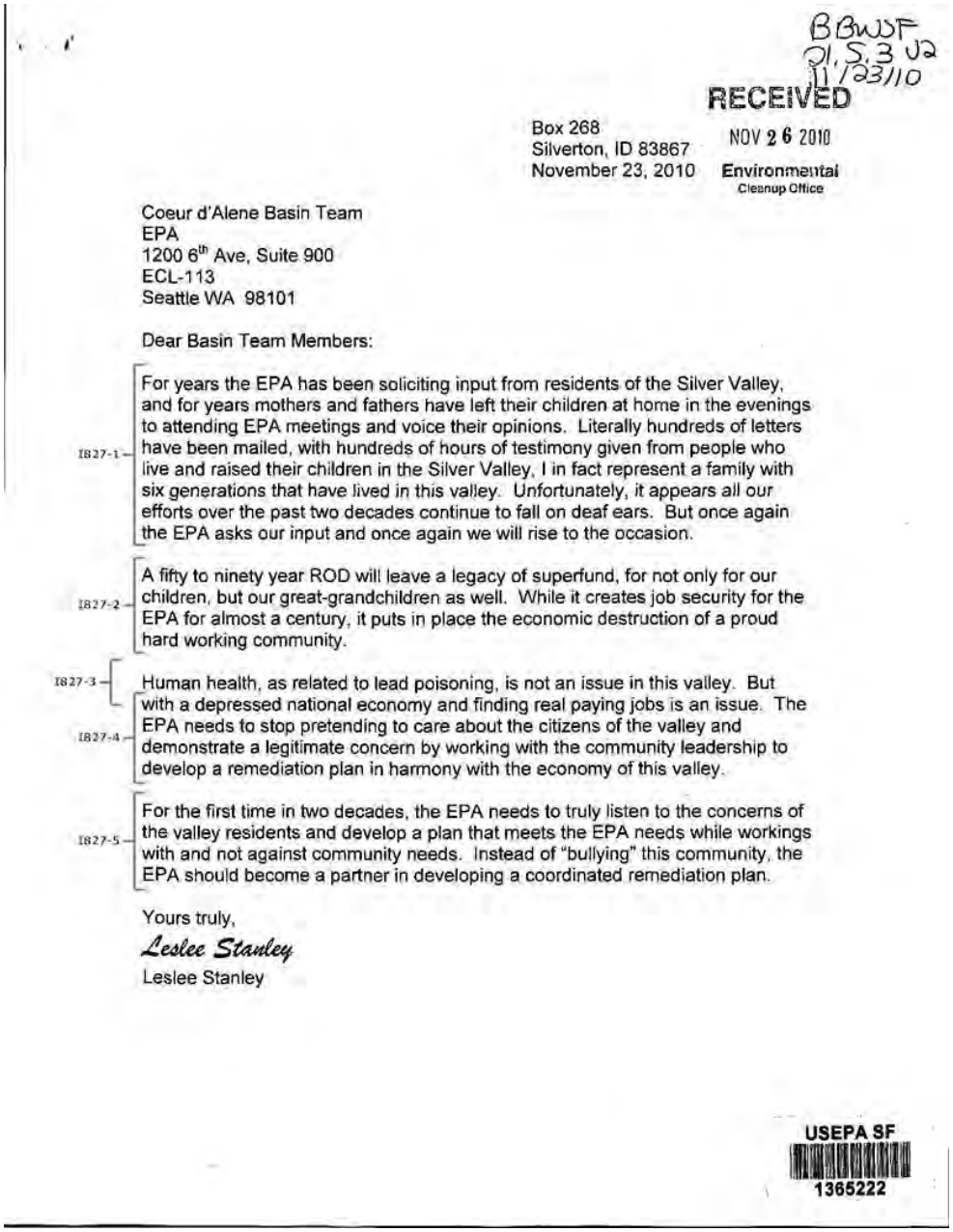
That being said, there are many instances in history that record when the cure was actually worse than the disease; for example, bleeding people was used to help make people healthy, even when the illness was anemia. Victorian-era women took arsenic to give themselves a fashionable pale complexion. And binding feet was used to give women dainty feet but cripple them before they were 30.

The EPA needs to take a good look at their ROD because their proposed cure is significantly worse than the problem they're attempting to solve. I do not

Response to comment I895-7

See response to Comment No. I58-2.

Stanley, Leslee, I827, Letter 1365222



BBWSF
21.5.3 J2
11/23/10

RECEIVED
NOV 26 2010
Environmental
Cleanup Office

Box 268
Silverton, ID 83867
November 23, 2010

Coeur d'Alene Basin Team
EPA
1200 6th Ave, Suite 900
ECL-113
Seattle WA 98101

Dear Basin Team Members:

I827-1 For years the EPA has been soliciting input from residents of the Silver Valley, and for years mothers and fathers have left their children at home in the evenings to attending EPA meetings and voice their opinions. Literally hundreds of letters have been mailed, with hundreds of hours of testimony given from people who live and raised their children in the Silver Valley, I in fact represent a family with six generations that have lived in this valley. Unfortunately, it appears all our efforts over the past two decades continue to fall on deaf ears. But once again the EPA asks our input and once again we will rise to the occasion.

I827-2 A fifty to ninety year ROD will leave a legacy of superfund, for not only for our children, but our great-grandchildren as well. While it creates job security for the EPA for almost a century, it puts in place the economic destruction of a proud hard working community.

I827-3 Human health, as related to lead poisoning, is not an issue in this valley. But with a depressed national economy and finding real paying jobs is an issue. The

I827-4 EPA needs to stop pretending to care about the citizens of the valley and demonstrate a legitimate concern by working with the community leadership to develop a remediation plan in harmony with the economy of this valley.

I827-5 For the first time in two decades, the EPA needs to truly listen to the concerns of the valley residents and develop a plan that meets the EPA needs while workings with and not against community needs. Instead of "bullying" this community, the EPA should become a partner in developing a coordinated remediation plan.

Yours truly,
Leslee Stanley
Leslee Stanley

USEPA SF
1365222

Response to comment I827-1
See response to Comment No. I295-2.

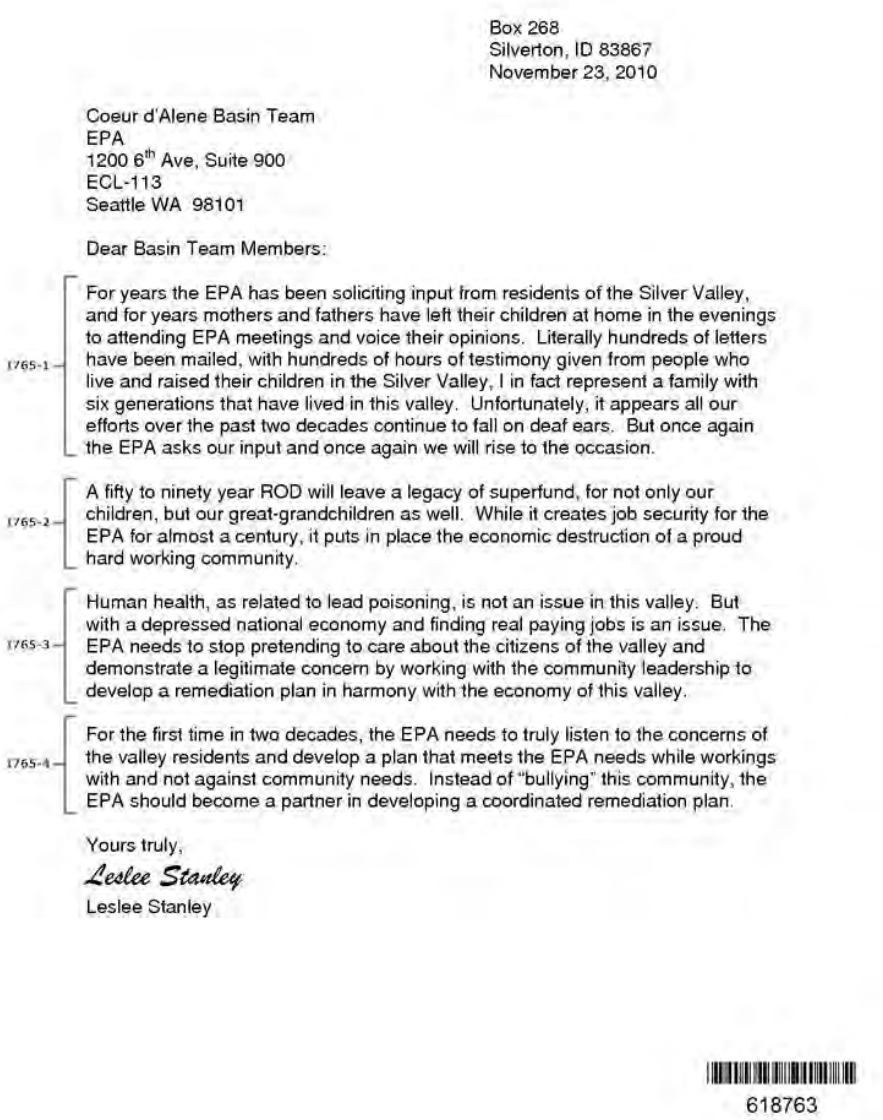
Response to comment I827-2
See responses to Comment Nos. I474-1 and I58-1.

Response to comment I827-3
See response to Comment No. I295-1.

Response to comment I827-4
See responses to Comment Nos. I54-2 and 1295-2.

Response to comment I827-5
See responses to Comment Nos. LJ39-5 and I295-2.

Stanley, Leslee, I765, Letter 618763



Box 268
Silverton, ID 83867
November 23, 2010

Coeur d'Alene Basin Team
EPA
1200 6th Ave, Suite 900
ECL-113
Seattle WA 98101

Dear Basin Team Members:

I765-1 For years the EPA has been soliciting input from residents of the Silver Valley, and for years mothers and fathers have left their children at home in the evenings to attending EPA meetings and voice their opinions. Literally hundreds of letters have been mailed, with hundreds of hours of testimony given from people who live and raised their children in the Silver Valley, I in fact represent a family with six generations that have lived in this valley. Unfortunately, it appears all our efforts over the past two decades continue to fall on deaf ears. But once again the EPA asks our input and once again we will rise to the occasion.

I765-2 A fifty to ninety year ROD will leave a legacy of superfund, for not only our children, but our great-grandchildren as well. While it creates job security for the EPA for almost a century, it puts in place the economic destruction of a proud hard working community.

I765-3 Human health, as related to lead poisoning, is not an issue in this valley. But with a depressed national economy and finding real paying jobs is an issue. The EPA needs to stop pretending to care about the citizens of the valley and demonstrate a legitimate concern by working with the community leadership to develop a remediation plan in harmony with the economy of this valley.

I765-4 For the first time in two decades, the EPA needs to truly listen to the concerns of the valley residents and develop a plan that meets the EPA needs while workings with and not against community needs. Instead of "bullying" this community, the EPA should become a partner in developing a coordinated remediation plan.

Yours truly,
Leslee Stanley
Leslee Stanley

618763

Response to comment I765-1

See response to Comment No. LJ39-5.

Response to comment I765-2

See responses to Comment Nos. I58-1 and I54-2.

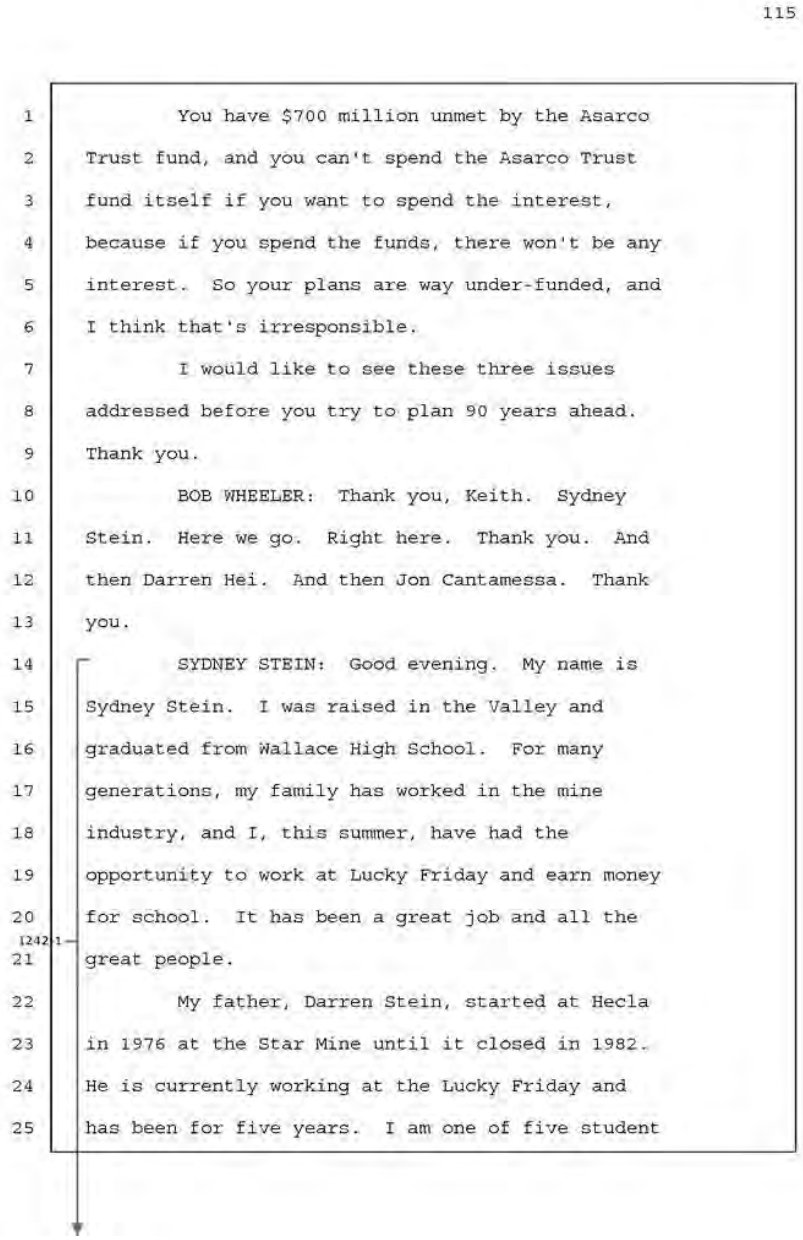
Response to comment I765-3

Regarding human health risks see response to Comment No. I295-1. Regarding the anticipated effects of the cleanup on the local economy, see response to Comment No.I474-1. Development of the Selected Remedy was collaborative process with the community as described in the response to Comment No. I295-2.

Response to comment I765-4

EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of its work. The ongoing involvement of the community will be an important part of the cleanup as it moves forward. EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. See response to Comment No. LJ11-2.

Stein, Sydney, I242, Letter 610097-37



115

You have $700 million unmet by the Asarco Trust fund, and you can't spend the Asarco Trust fund itself if you want to spend the interest, because if you spend the funds, there won't be any interest. So your plans are way under-funded, and I think that's irresponsible.

I would like to see these three issues addressed before you try to plan 90 years ahead. Thank you.

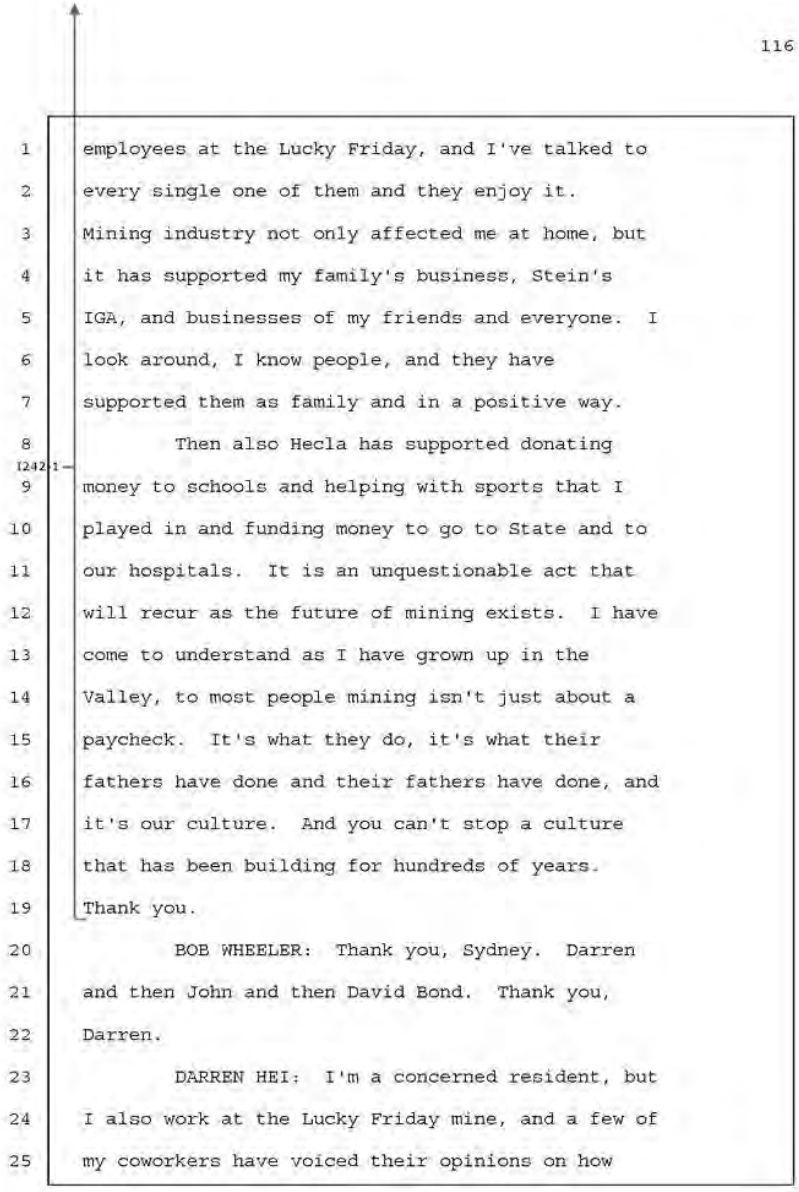
BOB WHEELER: Thank you, Keith. Sydney Stein. Here we go. Right here. Thank you. And then Darren Hei. And then Jon Cantamessa. Thank you.

SYDNEY STEIN: Good evening. My name is Sydney Stein. I was raised in the Valley and graduated from Wallace High School. For many generations, my family has worked in the mine industry, and I, this summer, have had the opportunity to work at Lucky Friday and earn money for school. It has been a great job and all the great people. I242-1

My father, Darren Stein, started at Hecla in 1976 at the Star Mine until it closed in 1982. He is currently working at the Lucky Friday and has been for five years. I am one of five student

Response to comment I242-1

Thank you for your comment.



116

employees at the Lucky Friday, and I've talked to every single one of them and they enjoy it. Mining industry not only affected me at home, but it has supported my family's business, Stein's IGA, and businesses of my friends and everyone. I look around, I know people, and they have supported them as family and in a positive way.

Then also Hecla has supported donating money to schools and helping with sports that I played in and funding money to go to State and to our hospitals. It is an unquestionable act that will recur as the future of mining exists. I have come to understand as I have grown up in the Valley, to most people mining isn't just about a paycheck. It's what they do, it's what their fathers have done and their fathers have done, and it's our culture. And you can't stop a culture that has been building for hundreds of years. Thank you.

BOB WHEELER: Thank you, Sydney. Darren and then John and then David Bond. Thank you, Darren.

DARREN HEI: I'm a concerned resident, but I also work at the Lucky Friday mine, and a few of my coworkers have voiced their opinions on how

I242-1

No comments

Stempf, Debbie, I445, Letter 898784

Proposed cleanup plan Coeur d'Alene Basin
Debbie Stempf
to:
CDABasin
09/03/2010 01:53 PM
Please respond to "Debbie Stempf"
Show Details

I445-1 Hello. The cleanup should be as extensive as possible as this area is feeding Spokane and close communities with drinking water through the Rathdrum aquifer. Implement the strongest plan available as soon as possible.
Thank you.
Debbie Stempf
4111 E Prairie Lane Ct
Spokane, Wa 99223

898784

Response to comment I445-1

Comment noted. See response to Comment No. I58-1.

Stepro, Dale, I501, Letter 1308956

BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I501-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I501-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I501-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Dale Stepro Jr.

Response to comment I501-1
See response to Comment No. I474-1.

Response to comment I501-2
See response to Comment No. I474-2.

Response to comment I501-3
See response to Comment No. I474-3.

Storjohann, Andrea, l440, Letter 898779

CdA Basin
apanda13@juno.com
to:
CDABasin
08/25/2010 12:19 PM
Show Details

l440-1 Please stop the madness and do not expand the CdA Basin superfund area and also cease all work currently being done. As a civil engineer in the area, I am astounded by the waste of money that has already occurred. In an area of high natural mineralization, how can you even separate out what has been generated by ground disturbance from mining or other activities and what may have been naturally l440-2 present and even possibly leached out. Thank you for this opportunity to comment. Andrea Paroni Storjohann, PE, 16458 N Sitka Road, Rathdrum, ID 83858

898779

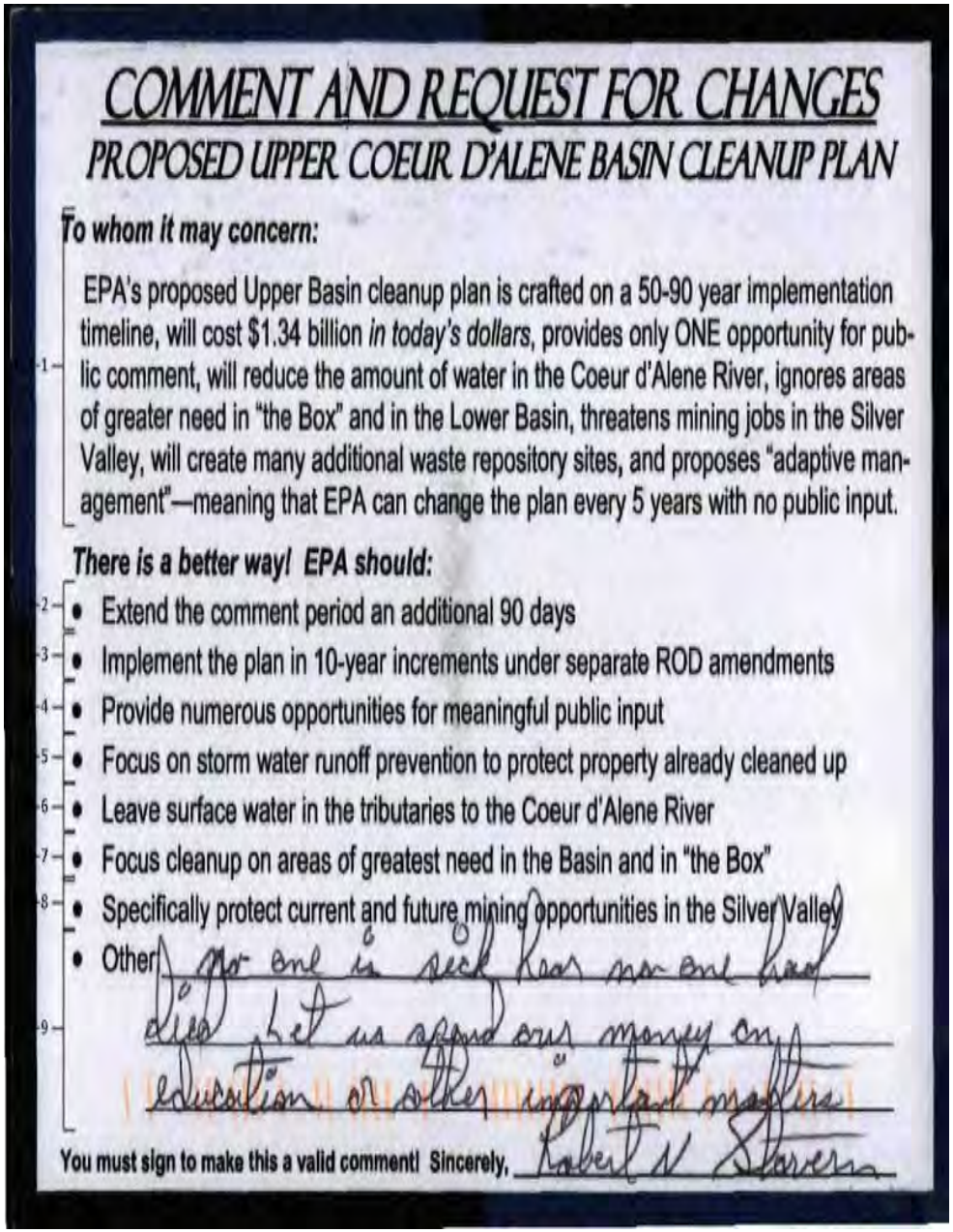
Response to comment l440-1

See response to Comments No. 1295-1 and LJ39-5.

Response to comment l440-2

See response to Comment No. LC33-8.

Stover, Bob, I25, Letter 1357069



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- Extend the comment period an additional 90 days
- Implement the plan in 10-year increments under separate ROD amendments
- Provide numerous opportunities for meaningful public input
- Focus on storm water runoff prevention to protect property already cleaned up
- Leave surface water in the tributaries to the Coeur d'Alene River
- Focus cleanup on areas of greatest need in the Basin and in "the Box"
- Specifically protect current and future mining opportunities in the Silver Valley
- Other No one is sick here no one had died Let us spend our money on education or other important matters

You must sign to make this a valid comment! Sincerely, Robert W Stover

Response to comment I25-1

The comment raises multiple issues, which have been addressed in previous comment responses as follows:

- 50-90 year implementation timeline – see response to Comment No. I58-1.
- Cost of the Selected Remedy – see response to Comment No. I58-2.
- Reduction of the amount of water in the Coeur d'Alene River – see response to Comment No. I54-8.
- Implementation timeline – see response to Comment No. I58-1.
- Selected Remedy costs – see response to Comment No. I58-2.
- Reduction in river flow – see responses to Comment Nos. I54-8 and I54-9.
- Mining jobs – see response to Comment No. I58-5.
- Repositories – see response to Comment No. I54-3.
- Adaptive management and public input – see response to Comment No. I54-7.

The one issue not addressed in other comments is the need for remedial actions in the Lower Basin and the Box. The Selected Remedy includes remedial actions in the Bunker Hill Box (OU 2), as described in Section 12 of the ROD Amendment. The Lower Basin is not within the scope of the Selected Remedy, although the Upper Basin cleanup will result in improved water quality downstream in the Lower Basin. EPA is continuing to pursue data collection and analysis efforts in the Lower Basin to provide decisionmakers with an improved understanding of the Lower Basin and to support evaluations of specific remedial alternatives. After these efforts have been completed, EPA will prepare a Lower Basin Proposed Plan, subject to public comment, and a subsequent ROD Amendment to select a remedy for the Lower Basin.

Response to comment I25-2

Based on requests from the public after the Proposed Plan was issued, the comment period was extended 90 days for a total comment period of 135 days (from July 12 to November 23, 2010).

Response to comment I25-3

See response to Comment No. I58-4.

Response to comment I25-4

EPA has provided considerable opportunities for public input over time. A long-term Selected Remedy does not mean an end to public involvement; the public will have continuing opportunities to comment on how the cleanup is being implemented. EPA has committed to implement remedial actions in the Upper Basin through the Basin Environmental Improvement Project Commission (Basin Commission) process. Each year since the establishment of the Basin Commission and issuance of the OU 3 ROD in 2002, EPA has provided a summary of CERCLA-related activities for the one- and five-year work plans prepared by the Commission that summarize planned Basin-related activities. The one-year work plans establish and maintain the sequencing of activities that will be needed to complete the goals and objectives of the five-year plan. The Basin Commission Work Plans focus on general areas of work and do not go into project-specific detail. Per Basin Commission protocol, EPA's work plans are reviewed by the Commission's TLG and CCC, the Executive Director, and any other citizens who may wish to review and comment.

With the issuance of this Upper Basin ROD Amendment, EPA's one- and five-year work plans to the Basin Commission will be expanded to include the actions in the Selected Remedy for the Upper Basin.

In addition to EPA's more general Basin Commission Work Plans, EPA will also prepare annual Implementation Plans in collaboration with the Upper Basin PFT and other stakeholders. These Plans will summarize each year's planned cleanup activities in addition to the priority projects identified by the PFT.

EPA will work with the Basin Commission to develop the Implementation Plans, and the public will have opportunities to provide input.

If, in the future, changes to the Selected Remedy are significant, EPA will provide opportunities for public participation consistent with the requirements of Section 113(k) of the Comprehensive Environmental Response, Compensation, and Liability Act and 40 Code of Federal Regulations Section 300.435(c) of the National Oil and Hazardous Substances Pollution Contingency Plan. Depending on the significance of the changes in cleanup approach, there may be additional opportunities for public input.

Response to comment I25-5

See response to Comment No. I54-5.

Response to comment I25-6

See responses to Comment Nos. I54-8 and I54-9.

Response to comment I25-7

The Proposed Plan described how remedial actions included in the cleanup plan will be prioritized and carried out. The ROD Amendment clarifies and provides more details of the implementation approach for the Selected Remedy. With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT, EPA has developed a logical and transparent prioritization process over the past two years.

EPA has significantly reduced the scope of the Selected Remedy from the Preferred Alternative. EPA conducted a site-by-site review to identify the highest priority sites for remedial action and thus those that are included in the Selected Remedy. Remedial actions in the Box have remained a priority for implementation throughout this process. The PFT provided input to assist EPA in prioritizing actions in the Upper Basin to include in the Selected Remedy. This site-by-site review is described in detail in the FFS Report (EPA, August 2012, Final Focused Feasibility Study Report, Upper Basin of the Coeur d'Alene River, Bunker Hill Mining and Metallurgical Complex Superfund Site). Key considerations for this review included: (1) prior remedial actions and effectiveness of those actions, (2) active land uses, (3) potential human health risks, (4) downstream water quality, (5) site-specific data such as location, contaminant concentrations[1], riparian acreage, and erosion potential, and (6) access road requirements.

Response to comment I25-8

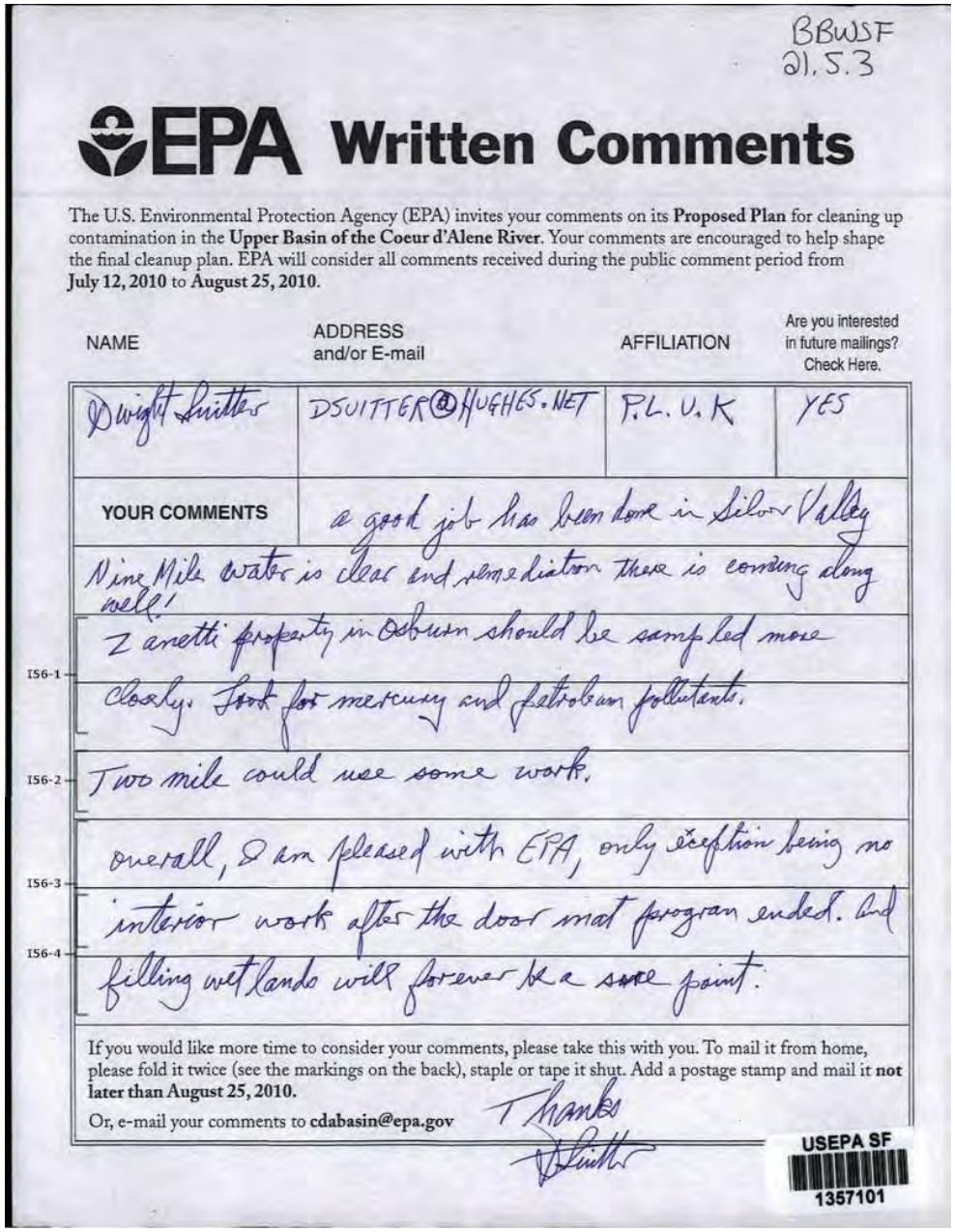
See response to Comment No. I58-5.

Response to comment I25-9

See response to Comment No. I295-1.

[1] The review of site-specific contaminant concentrations included data collected following the publication of the Proposed Plan in the summer of 2011 at select source sites in the Upper Basin. The results of this sampling effort are documented in the FFS Report (EPA, 2012).

Suitter, Dwight, I56, Letter 1357101



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
Dwight Suitter	DSUITTER@HUGHES.NET	P.L.U.K	YES

YOUR COMMENTS

a good job has been done in Silver Valley
Nine Mile water is clear and remediation there is coming along well!

I56-1 Zanetti property in Osburn should be sampled more closely. Look for mercury and petroleum pollutants.

I56-2 Two mile could use some work.

I56-3 overall, I am pleased with EPA, only exception being no interior work after the door mat program ended. And

I56-4 filling wetlands will forever be a sore point.

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

Thanks
D Suitter

USEPA SF
1357101

Response to comment I56-1

EPA will continue to monitor surface water and groundwater in the Upper Basin per the Basin Environmental Monitoring Plan (BEMP). Additional sampling will occur at site-specific locations to aid in remedial design and implementation of cleanup actions.

Response to comment I56-2

There are no cleanup actions in the Two Mile Creek watershed included in the Selected Remedy. However, this drainage, along with all others within the Upper Basin, will continue to be monitored and evaluated as part of the Five-Year Review process and if necessary to achieve Remedial Action Objectives, additional actions can be selected in future decision documents.

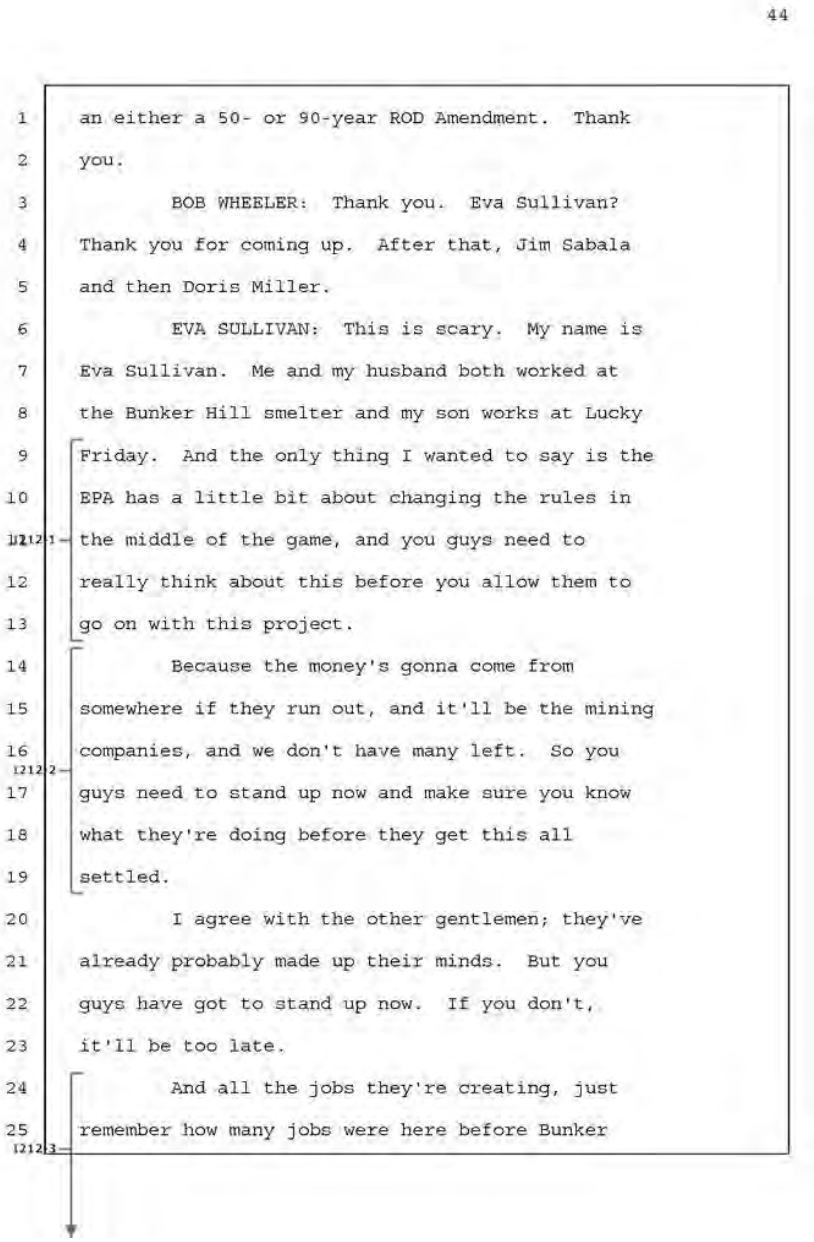
Response to comment I56-3

Thank you for your comment.

Response to comment I56-4

The commenter appears to be referring to the East Mission Flats repository and the potential for other regional repositories to be constructed within the floodplain. See response to Comment No. LC21-9.

Sullivan, Eva, I212, Letter 610097-7



44

an either a 50- or 90-year ROD Amendment. Thank you.

BOB WHEELER: Thank you. Eva Sullivan? Thank you for coming up. After that, Jim Sabala and then Doris Miller.

EVA SULLIVAN: This is scary. My name is Eva Sullivan. Me and my husband both worked at the Bunker Hill smelter and my son works at Lucky Friday. And the only thing I wanted to say is the EPA has a little bit about changing the rules in the middle of the game, and you guys need to I212-1 really think about this before you allow them to go on with this project.

Because the money's gonna come from somewhere if they run out, and it'll be the mining companies, and we don't have many left. So you I212-2 guys need to stand up now and make sure you know what they're doing before they get this all settled.

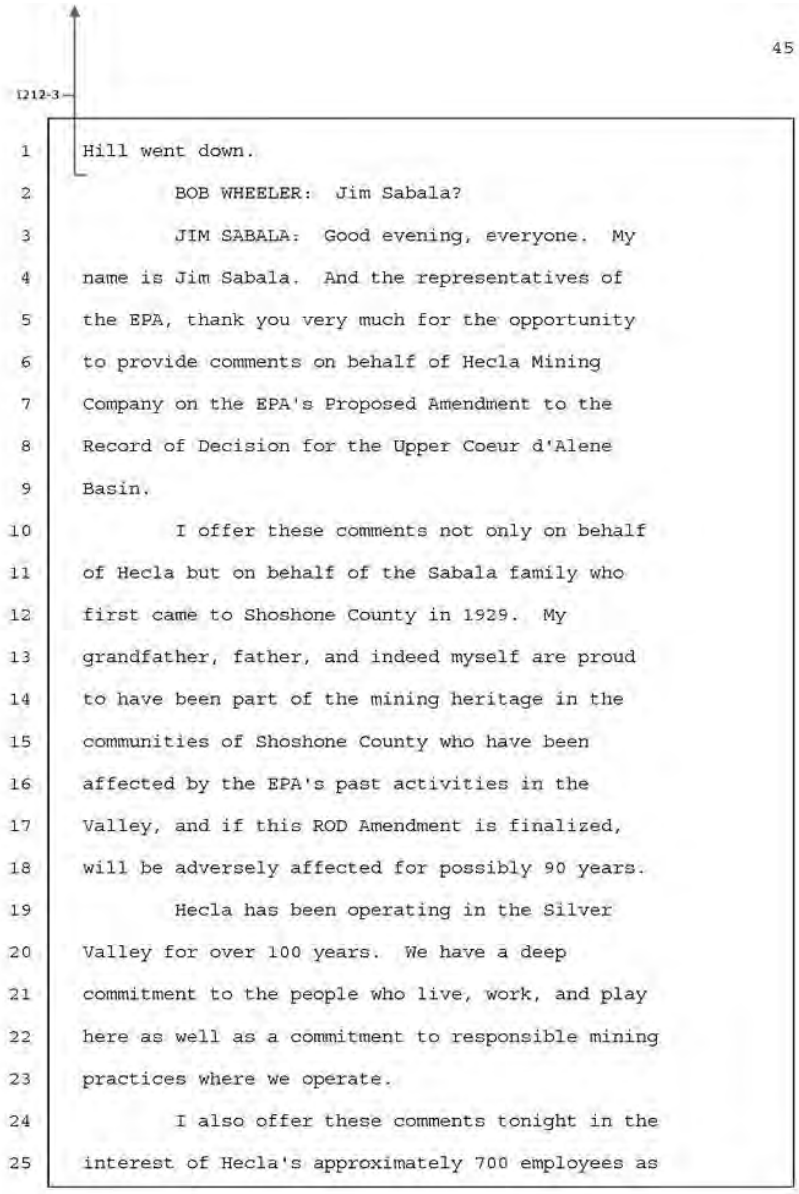
I agree with the other gentlemen; they've already probably made up their minds. But you guys have got to stand up now. If you don't, it'll be too late.

And all the jobs they're creating, just remember how many jobs were here before Bunker I212-3

Response to comment I212-1
Thank you for your comment.

Response to comment I212-2
See response to Comment I58-2.

Response to comment I212-3
See response to Comment No. LC32-2.



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I212-3

Hill went down.

BOB WHEELER: Jim Sabala?

JIM SABALA: Good evening, everyone. My name is Jim Sabala. And the representatives of the EPA, thank you very much for the opportunity to provide comments on behalf of Hecla Mining Company on the EPA's Proposed Amendment to the Record of Decision for the Upper Coeur d'Alene Basin.

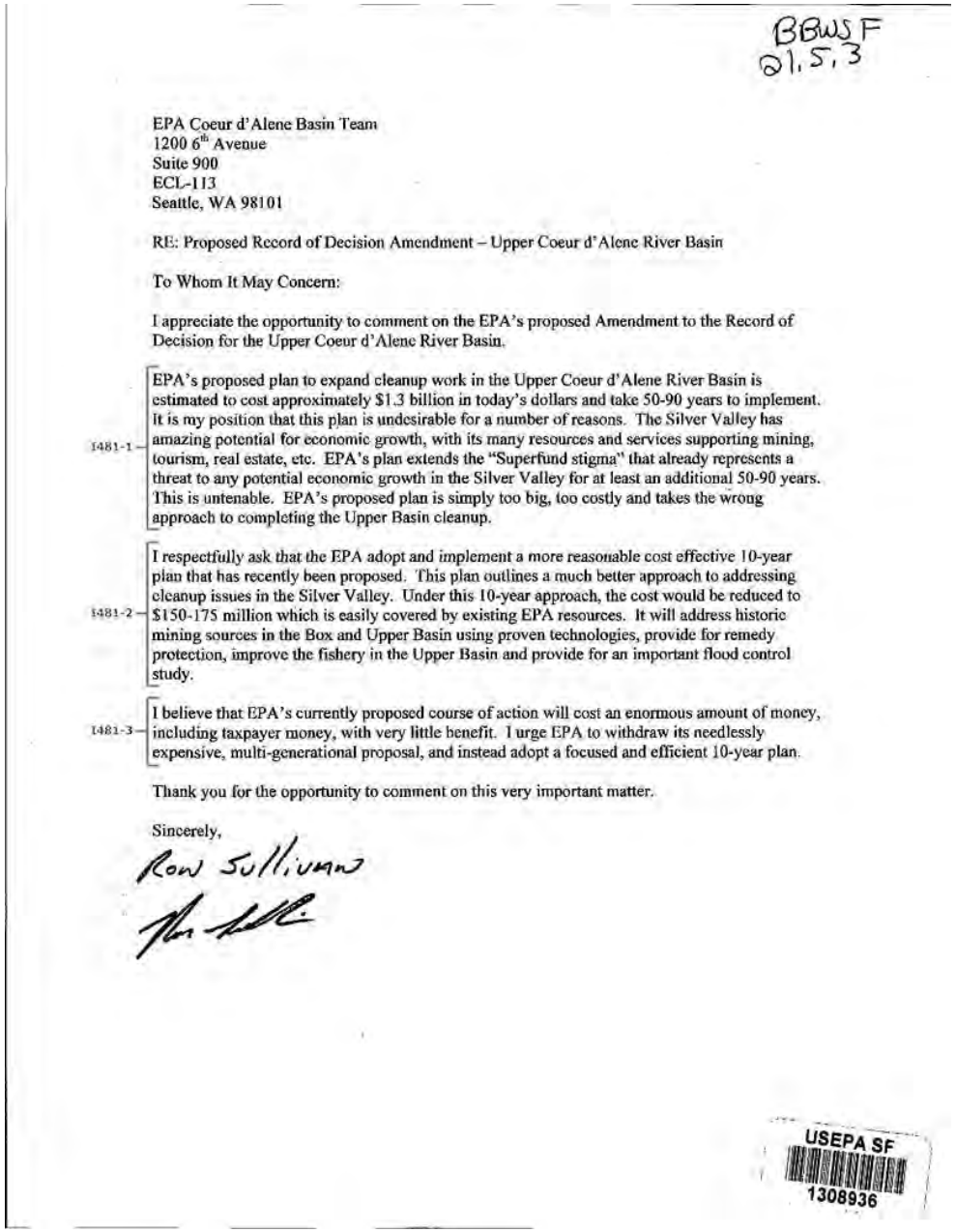
I offer these comments not only on behalf of Hecla but on behalf of the Sabala family who first came to Shoshone County in 1929. My grandfather, father, and indeed myself are proud to have been part of the mining heritage in the communities of Shoshone County who have been affected by the EPA's past activities in the Valley, and if this ROD Amendment is finalized, will be adversely affected for possibly 90 years.

Hecla has been operating in the Silver Valley for over 100 years. We have a deep commitment to the people who live, work, and play here as well as a commitment to responsible mining practices where we operate.

I also offer these comments tonight in the interest of Hecla's approximately 700 employees as

No comments

Sullivan, Ron, I481, Letter 1308936



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I481-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I481-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I481-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Ron Sullivan

USEPA SF
1308936

Response to comment I481-1

See response to Comment No. I474-1.

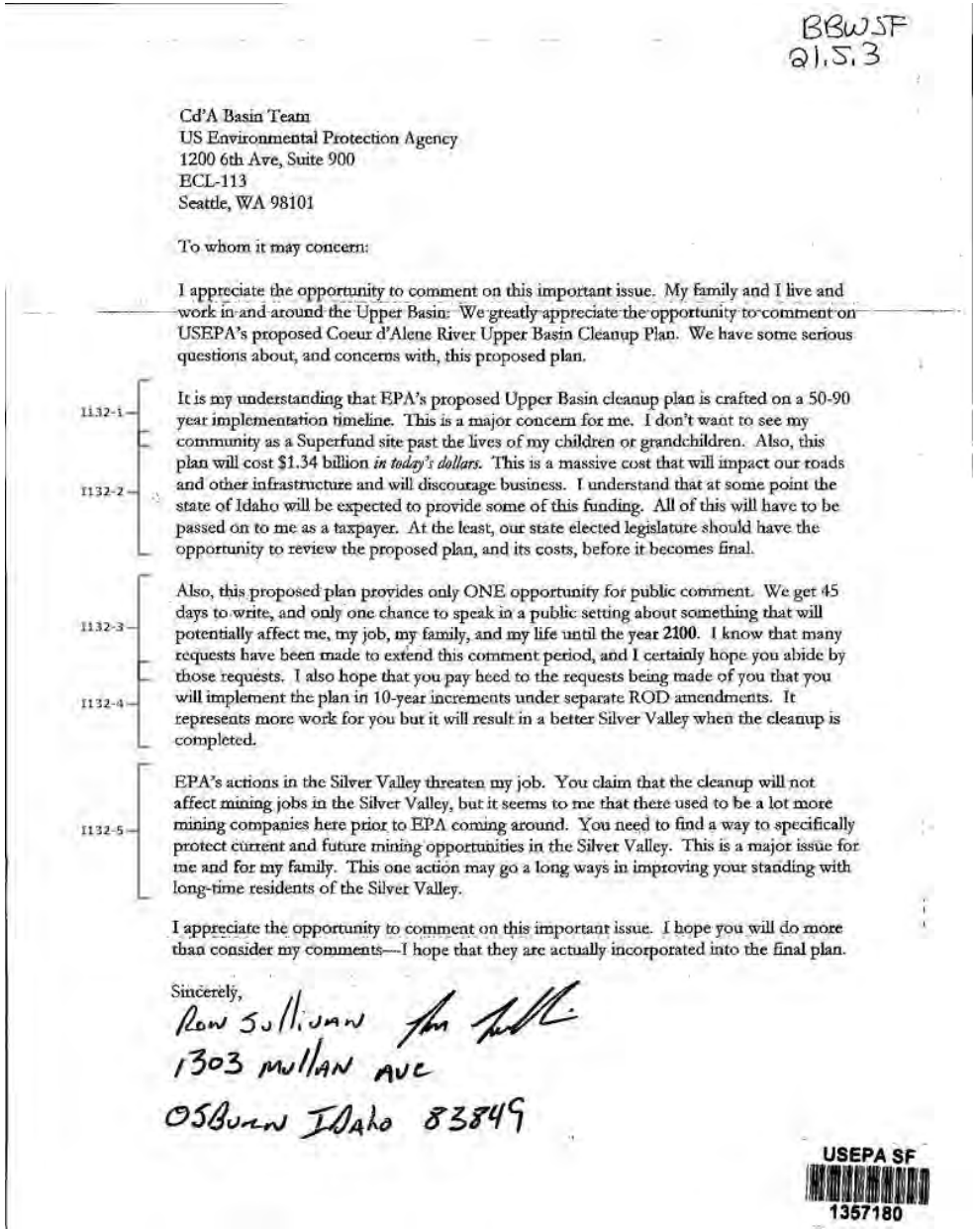
Response to comment I481-2

See response to Comment No. I474-2.

Response to comment I481-3

See response to Comment No. I474-3.

Sullivan, Row, I132, Letter 1357180



BBWJF
Q1.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I132-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I132-2 plan will cost $1.34 billion *in today's dollars.* This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I132-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many

I132-4 requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I132-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,
Row Sullivan
1303 Mullan Ave
Osburn Idaho 83849

USEPA SF
1357180

Response to comment I132-1
See response to Comment No. I58-1.

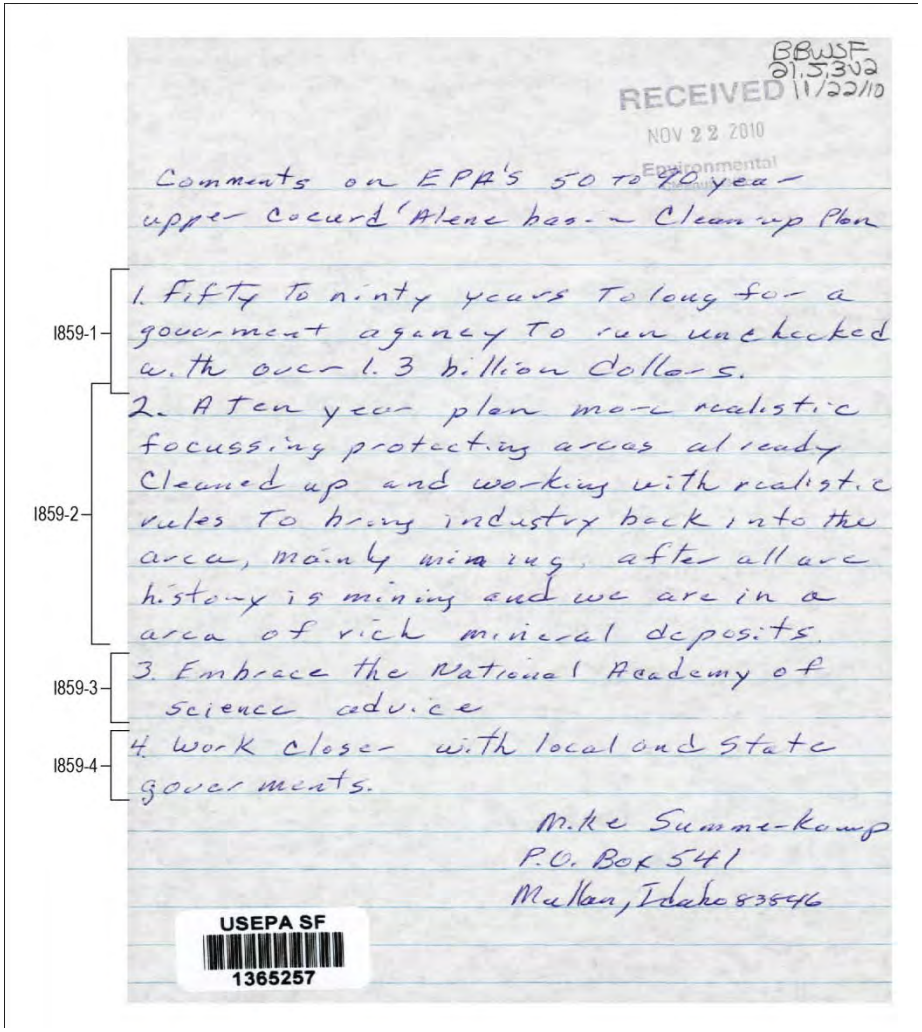
Response to comment I132-2
See response to Comment No. I58-2.

Response to comment I132-3
See response to Comment No. I58-3.

Response to comment I132-4
See response to Comment No. I58-4.

Response to comment I132-5
See response to Comment No. I58-5.

Summerkamp, Mike, I859, Letter 1365257



BBWSF
21.5.302
11/22/10

RECEIVED
NOV 22 2010
Environmental

Comments on EPA's 50 to 70 year - upper Coeur d'Alene bas. - Clean up Plan

I859-1 1. Fifty to ninty years Tolong for a goverment aganey To run unchecked w. th over 1.3 billion dollars.

I859-2 2. A Ten year plan more realistic focussing protecting areas already Cleaned up and working with realistic rules To bring industry back into the area, mainly mining, after all are history is mining and we are in a area of rich mineral depesits.

I859-3 3. Embrace the National Academy of science advice

I859-4 4. work closer with local and State goverments.

Mike Summerkamp
P.O. Box 541
Mullan, Idaho 83846

USEPA SF
1365257

Response to comment I859-1

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I859-2

See responses to Comments Nos. I474-2 and I58-5.

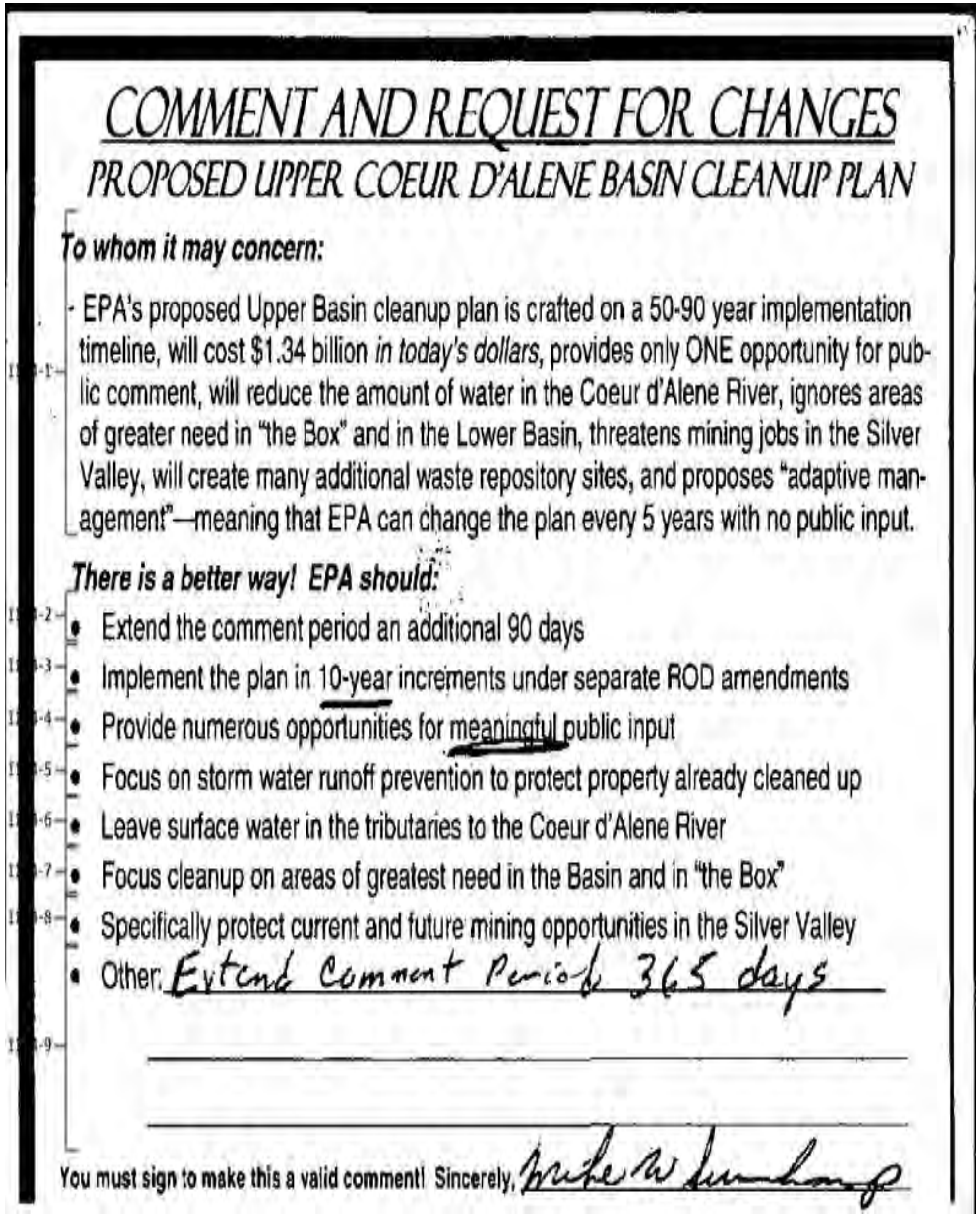
Response to comment I859-3

See response to Comment No. LJ27-8.

Response to comment I859-4

See response to Comment No. LJ39-5.

Summerkamp, Mike, I184, Letter 1357477



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

- EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- Extend the comment period an additional 90 days
- Implement the plan in 10-year increments under separate ROD amendments
- Provide numerous opportunities for meaningful public input
- Focus on storm water runoff prevention to protect property already cleaned up
- Leave surface water in the tributaries to the Coeur d'Alene River
- Focus cleanup on areas of greatest need in the Basin and in "the Box"
- Specifically protect current and future mining opportunities in the Silver Valley
- Other: Extend Comment Period 365 days

You must sign to make this a valid comment! Sincerely, Mike W Summerkamp

Response to comment I184-1
See response to Comment No. I25-1.

Response to comment I184-2
See response to Comment No. I25-2.

Response to comment I184-3
See response to Comment No. I25-3.

Response to comment I184-4
See response to Comment No. I25-4.

Response to comment I184-5
See response to Comment No. I25-5.

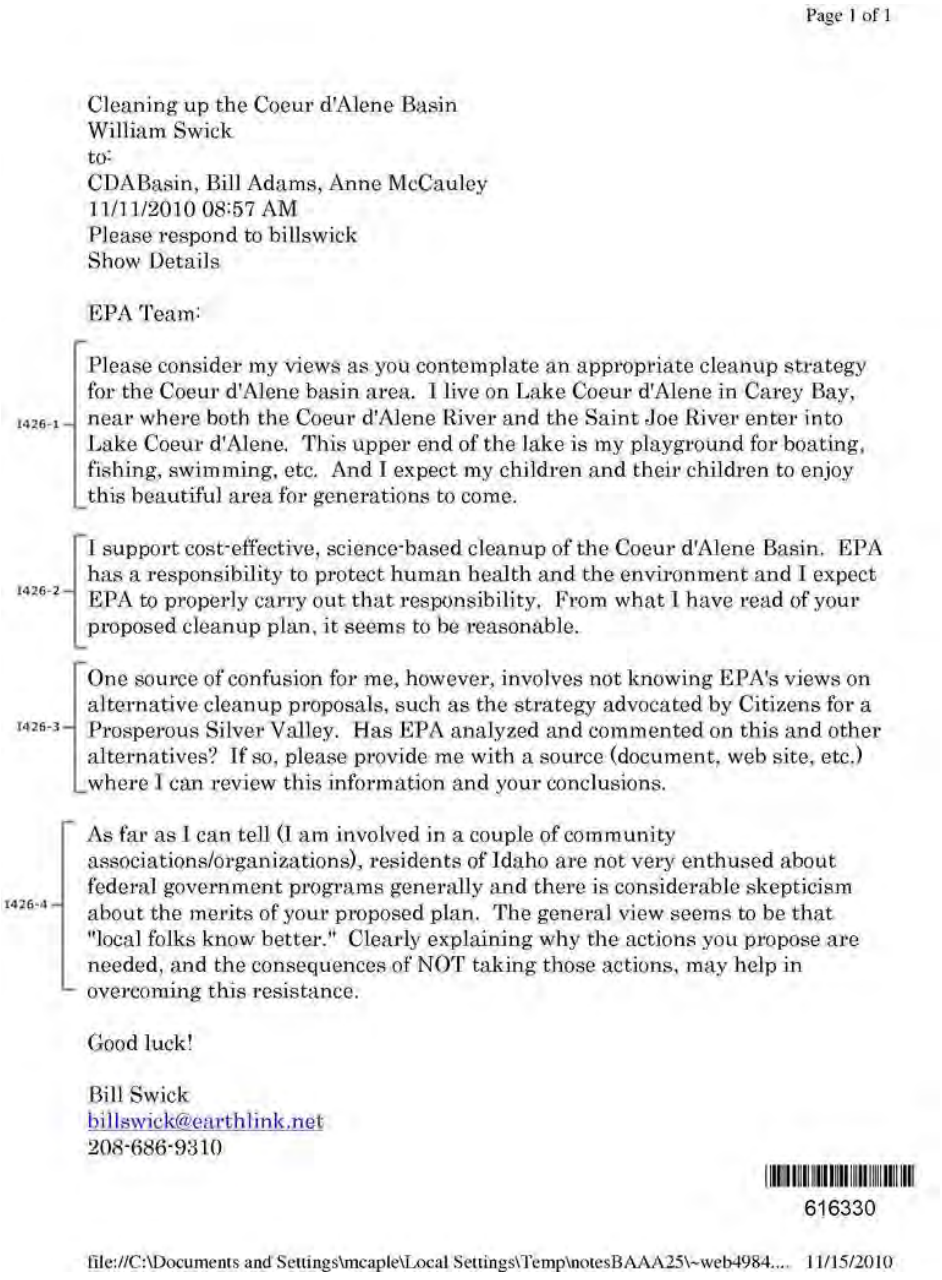
Response to comment I184-6
See response to Comment No. I25-6.

Response to comment I184-7
See response to Comment No. I25-7.

Response to comment I184-8
See response to Comment No. I25-8.

Response to comment I184-9
See response to Comment No. 154-6.

Swick, William, I426, Letter 616330



Page 1 of 1

Cleaning up the Coeur d'Alene Basin
William Swick
to:
CDABasin, Bill Adams, Anne McCauley
11/11/2010 08:57 AM
Please respond to billswick
Show Details

EPA Team:

I426-1 Please consider my views as you contemplate an appropriate cleanup strategy for the Coeur d'Alene basin area. I live on Lake Coeur d'Alene in Carey Bay, near where both the Coeur d'Alene River and the Saint Joe River enter into Lake Coeur d'Alene. This upper end of the lake is my playground for boating, fishing, swimming, etc. And I expect my children and their children to enjoy this beautiful area for generations to come.

I426-2 I support cost-effective, science-based cleanup of the Coeur d'Alene Basin. EPA has a responsibility to protect human health and the environment and I expect EPA to properly carry out that responsibility. From what I have read of your proposed cleanup plan, it seems to be reasonable.

I426-3 One source of confusion for me, however, involves not knowing EPA's views on alternative cleanup proposals, such as the strategy advocated by Citizens for a Prosperous Silver Valley. Has EPA analyzed and commented on this and other alternatives? If so, please provide me with a source (document, web site, etc.) where I can review this information and your conclusions.

I426-4 As far as I can tell (I am involved in a couple of community associations/organizations), residents of Idaho are not very enthused about federal government programs generally and there is considerable skepticism about the merits of your proposed plan. The general view seems to be that "local folks know better." Clearly explaining why the actions you propose are needed, and the consequences of NOT taking those actions, may help in overcoming this resistance.

Good luck!

Bill Swick
billswick@earthlink.net
208-686-9310

616330

file://C:\Documents and Settings\mcaple\Local Settings\Temp\notesBAAA25\~web4984.... 11/15/2010

Response to comment I426-1

Thank you for your comment.

Response to comment I426-2

Comment noted and appreciated.

Response to comment I426-3

See response to Comment No. I474-2 regarding the Hecla 10-Year Plan, which is the same plan advocated by Citizens for a Prosperous Silver Valley.

Response to comment I426-4

EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments. The Upper Basin ROD Amendment describes that actions are needed to reduce risks to human health and the environment, based on investigations and monitoring data collected over many years. Ongoing EPA communications through many channels have focused on explaining the contamination problem, its risks, and possible cleanup actions. "Local folks" do have important perspectives and information to contribute, and the agency has directly involved communities and other stakeholders in development of the remedy.

Taruscio, Blake, I805, Letter 619571

Fw: proposed Cd'A River clean up
Ed Moreen to: CDABasin 11/29/2010 12:05 PM
Cc: Anne Dailey, Don Martin

I just received this

Ed Moreen
U.S. Environmental Protection Agency
Coeur d'Alene Field Office
1910 Northwest Blvd, Suite 208
Coeur d'Alene, ID 83814
ph. 208.664.4588
fax 208.664.5829
http://www.epa.gov/r10earth/bh.htm

---- Forwarded by Ed Moreen/R10/USEPA/US on 11/29/2010 12:08 PM ----

From: blake taruscio <blake_taruscio@yahoo.com>
To: Ed Moreen/R10/USEPA/US@EPA
Date: 11/29/2010 12:40 AM
Subject: proposed Cd'A River clean up

I805-1 I want to express my support for the proposed Coeur d'Alene River clean up. As a long time resident of Coeur d'Alene, I understand the damage that has taken place from mining over the last century or so. The heavy metal content is unacceptable and poses great risk to individuals living near or recreating on this river. The potential adverse effect to business and industry in the area is unfortunate, and the proposed clean up is costly. However, I believe a price cannot be placed on the health of our residents and natural environment.

In general, this region has a long history of placing the financial gain of some over the state of our ecosystem. With out getting into the political nature of this, which I'm sure you are well aware of, I hope that the EPA succeeds in their efforts to do something about poor state of the proposed clean up area.

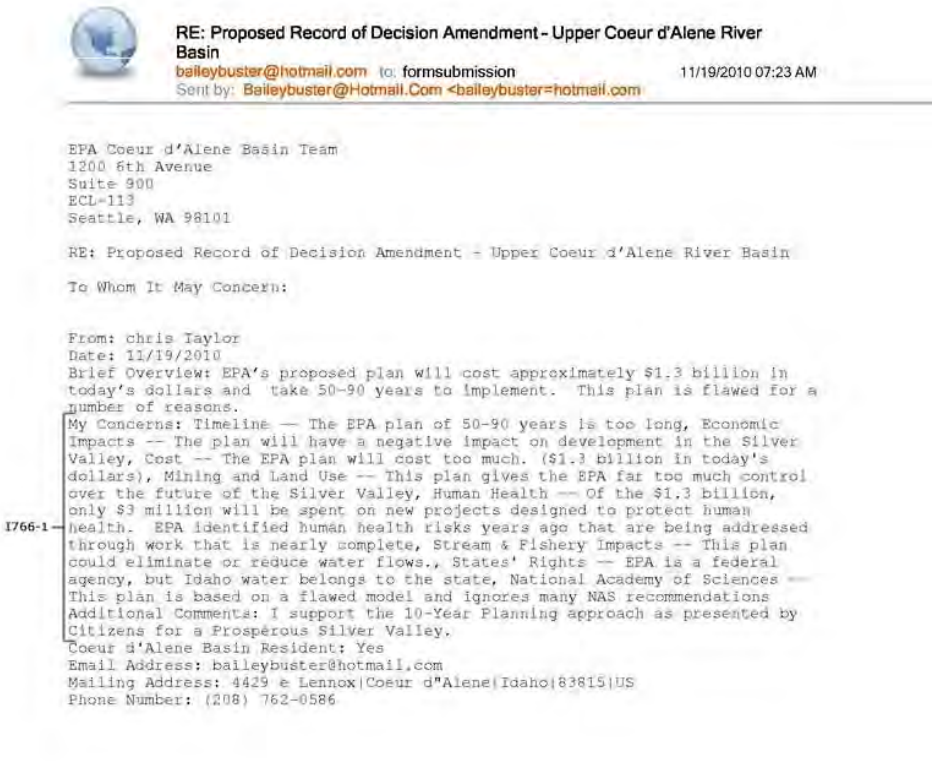
Blake Taruscio

619571

Response to comment I805-1

Thank you for your comments.

Taylor, Chris, I766, Letter 618764



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
baileybuster@hotmail.com to: formsubmission 11/19/2010 07:23 AM
Sent by: Baileybuster@Hotmail.Com <baileybuster=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: chris Taylor
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: baileybuster@hotmail.com
Mailing Address: 4429 e Lennox|Coeur d"Alene|Idaho|83815|US
Phone Number: (208) 762-0586

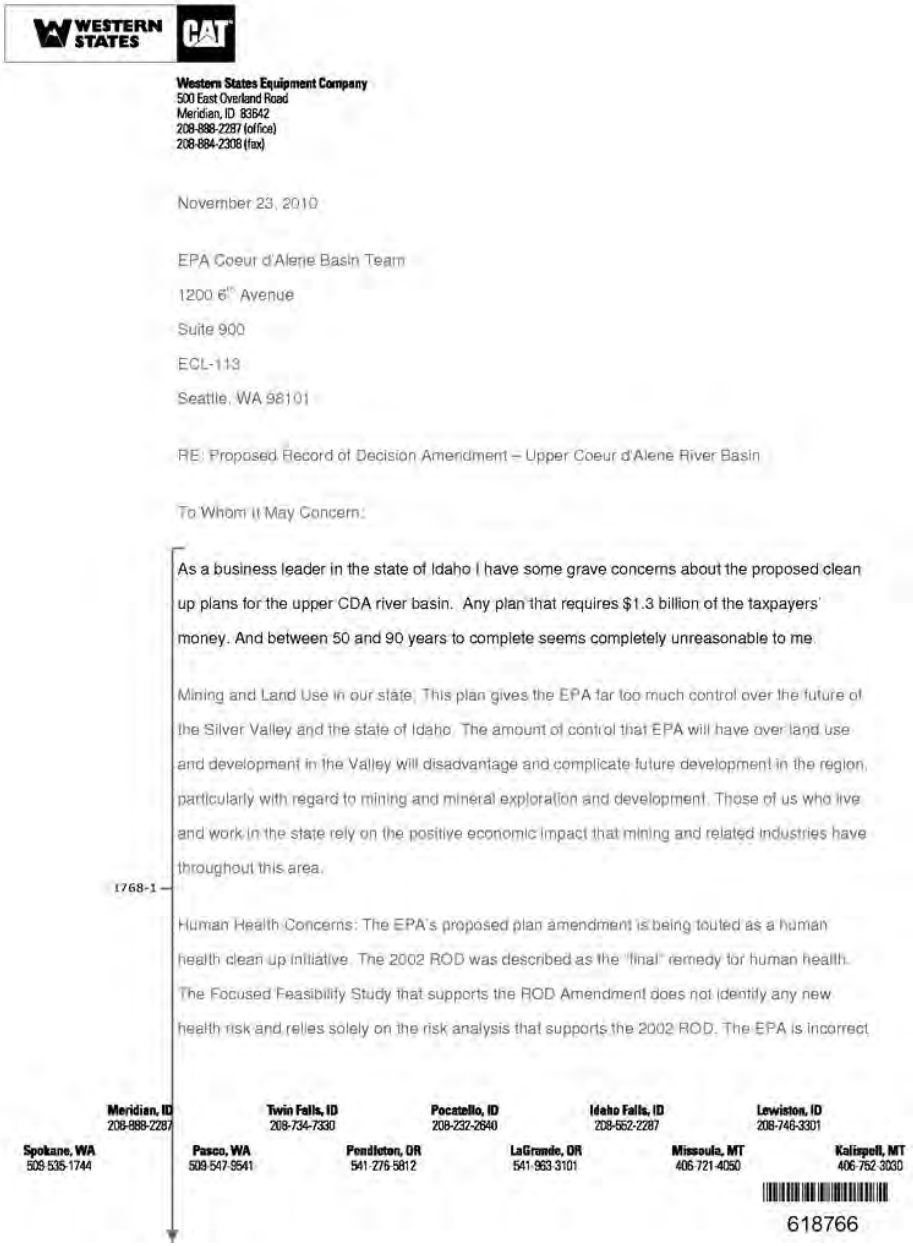
I766-1

618764

Response to comment I766-1

See response to Comment No. I351-1.

Terteling, Tom, I768, Letter 618766



WESTERN STATES CAT

Western States Equipment Company
500 East Overland Road
Meridian, ID 83642
208-888-2287 (office)
208-884-2308 (fax)

November 23, 2010

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom it May Concern:

As a business leader in the state of Idaho I have some grave concerns about the proposed clean up plans for the upper CDA river basin. Any plan that requires $1.3 billion of the taxpayers' money. And between 50 and 90 years to complete seems completely unreasonable to me.

Mining and Land Use in our state. This plan gives the EPA far too much control over the future of the Silver Valley and the state of Idaho. The amount of control that EPA will have over land use and development in the Valley will disadvantage and complicate future development in the region, particularly with regard to mining and mineral exploration and development. Those of us who live and work in the state rely on the positive economic impact that mining and related industries have throughout this area.

I768-1

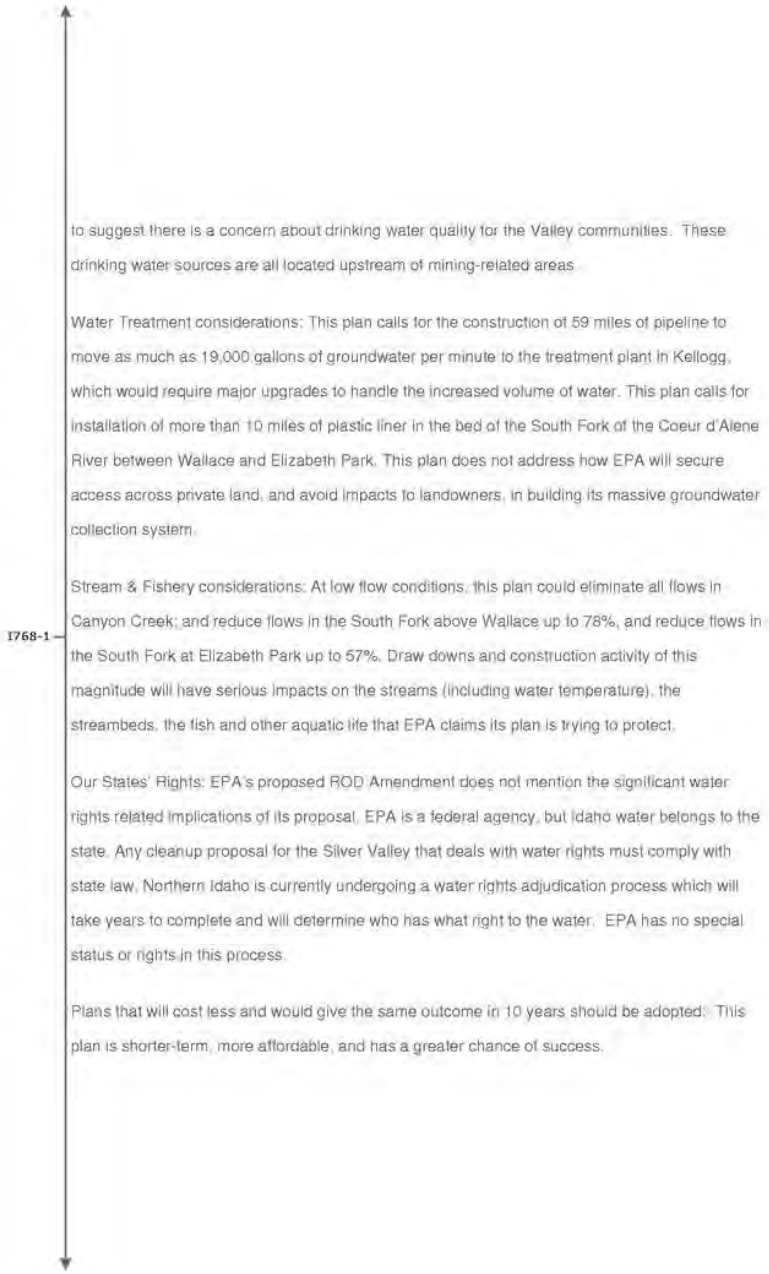
Human Health Concerns: The EPA's proposed plan amendment is being touted as a human health clean up initiative. The 2002 ROD was described as the "final" remedy for human health. The Focused Feasibility Study that supports the ROD Amendment does not identify any new health risk and relies solely on the risk analysis that supports the 2002 ROD. The EPA is incorrect

Meridian, ID 208-888-2287
Twin Falls, ID 208-734-7330
Pocatello, ID 208-232-2640
Idaho Falls, ID 208-552-2287
Lewiston, ID 208-746-3301
Spokane, WA 509-535-1744
Pasco, WA 509-547-9541
Pendleton, OR 541-276-5812
LaGrande, OR 541-963-3101
Missoula, MT 406-721-4050
Kalispell, MT 406-752-3030

618766

Response to comment I768-1

These comments are nearly identical to comment Document I643. Please see responses to Document I643.



to suggest there is a concern about drinking water quality for the Valley communities. These drinking water sources are all located upstream of mining-related areas.

Water Treatment considerations: This plan calls for the construction of 59 miles of pipeline to move as much as 19,000 gallons of groundwater per minute to the treatment plant in Kellogg, which would require major upgrades to handle the increased volume of water. This plan calls for installation of more than 10 miles of plastic liner in the bed of the South Fork of the Coeur d'Alene River between Wallace and Elizabeth Park. This plan does not address how EPA will secure access across private land, and avoid impacts to landowners, in building its massive groundwater collection system.

Stream & Fishery considerations: At low flow conditions, this plan could eliminate all flows in Canyon Creek; and reduce flows in the South Fork above Wallace up to 78%, and reduce flows in the South Fork at Elizabeth Park up to 57%. Draw downs and construction activity of this magnitude will have serious impacts on the streams (including water temperature), the streambeds, the fish and other aquatic life that EPA claims its plan is trying to protect.

I768-1

Our States' Rights: EPA's proposed ROD Amendment does not mention the significant water rights related implications of its proposal. EPA is a federal agency, but Idaho water belongs to the state. Any cleanup proposal for the Silver Valley that deals with water rights must comply with state law. Northern Idaho is currently undergoing a water rights adjudication process which will take years to complete and will determine who has what right to the water. EPA has no special status or rights in this process.

Plans that will cost less and would give the same outcome in 10 years should be adopted: This plan is shorter-term, more affordable, and has a greater chance of success.

No comments

I768-1

The 10-Year Plan:

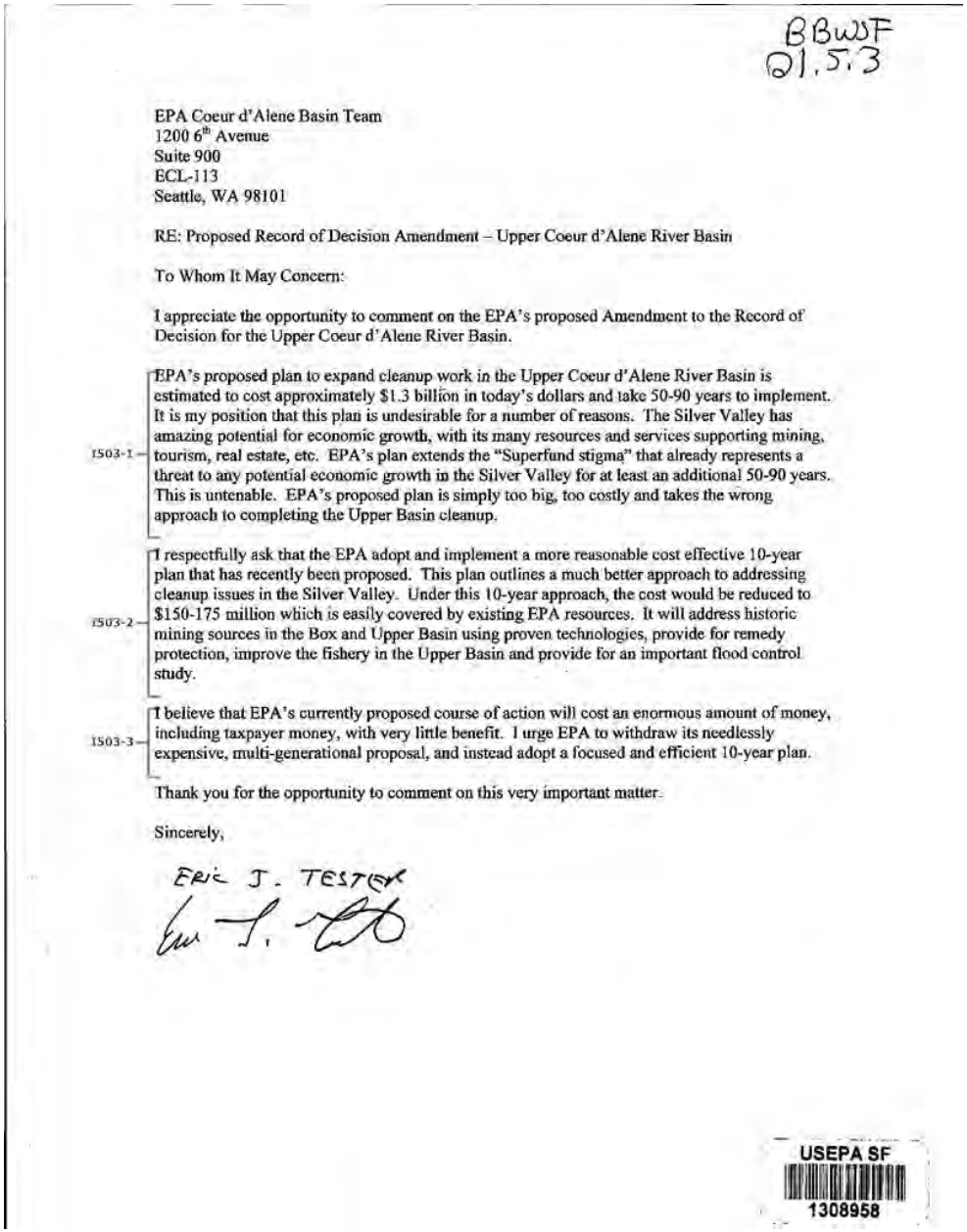
- Would cost only $150 - $175 million
- Is based on actual data
- Includes remedy protection in towns and populated areas
- Includes a $2 million study to support flood control in the Valley
- Allows multiple opportunities for meaningful public input
- Focuses on priority sources of zinc loading above Wallace (Canyon/Nine Mile creeks) and in the "Box"
- Will not dewater the Coeur d'Alene River
- Establishes achievable goals and benchmarks
- Will not require massive treatment plant upgrades
- Respects existing private property rights, water rights and states' rights
- Protects current and future economic development, including mining and land-use opportunities in the Silver Valley
- Requires no additional repositories
- Improves fisheries through site-specific actions and proven technologies
- Improves water quality standards more quickly and at less cost
- Is best for the Valley, its residents and for Idaho
- Is a *better way*!

Thank you for the opportunity to comment on your plan I look forward to seeing a more reasonable EPA approach in the future.

Tom Terteling

No comments

Tester, Eric, I503, Letter 1308958



BBWSF
01.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I503-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I503-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I503-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

ERIC J. TESTER

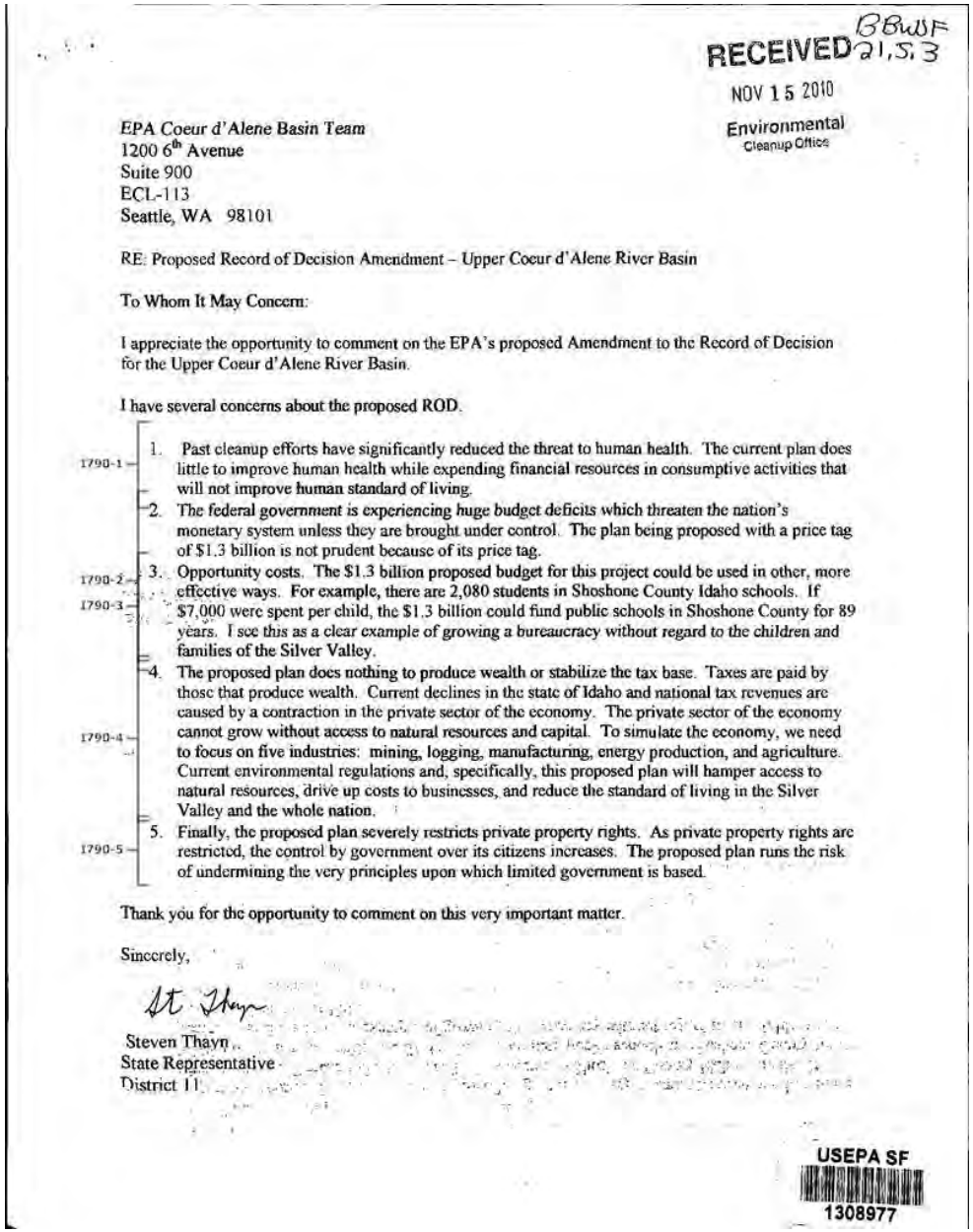
USEPA SF
1308958

Response to comment I503-1
See response to Comment No. I474-1.

Response to comment I503-2
See response to Comment No. I474-2.

Response to comment I503-3
See response to Comment No. I474-3.

Thayn, Steven, I790, Letter 1308977



RECEIVED BBWSF 21,53
NOV 15 2010
Environmental Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I have several concerns about the proposed ROD.

1790-1 1. Past cleanup efforts have significantly reduced the threat to human health. The current plan does little to improve human health while expending financial resources in consumptive activities that will not improve human standard of living.

2. The federal government is experiencing huge budget deficits which threaten the nation's monetary system unless they are brought under control. The plan being proposed with a price tag of $1.3 billion is not prudent because of its price tag.

1790-2 3. Opportunity costs. The $1.3 billion proposed budget for this project could be used in other, more
1790-3 effective ways. For example, there are 2,080 students in Shoshone County Idaho schools. If $7,000 were spent per child, the $1.3 billion could fund public schools in Shoshone County for 89 years. I see this as a clear example of growing a bureaucracy without regard to the children and families of the Silver Valley.

4. The proposed plan does nothing to produce wealth or stabilize the tax base. Taxes are paid by those that produce wealth. Current declines in the state of Idaho and national tax revenues are caused by a contraction in the private sector of the economy. The private sector of the economy
1790-4 cannot grow without access to natural resources and capital. To simulate the economy, we need to focus on five industries: mining, logging, manufacturing, energy production, and agriculture. Current environmental regulations and, specifically, this proposed plan will hamper access to natural resources, drive up costs to businesses, and reduce the standard of living in the Silver Valley and the whole nation.

1790-5 5. Finally, the proposed plan severely restricts private property rights. As private property rights are restricted, the control by government over its citizens increases. The proposed plan runs the risk of undermining the very principles upon which limited government is based.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Steven Thayn
State Representative
District 11

USEPA SF
1308977

Response to comment I790-1
See response to Comment No. I295-1.

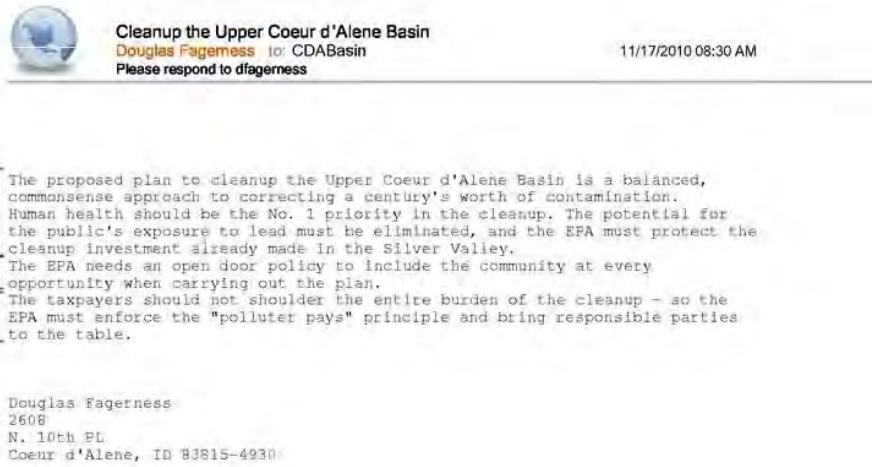
Response to comment I790-2
See responses to Comment Nos. I58-2 and I527-1.

Response to comment I790-3
CERCLA does not provide EPA with the authority to address general educational needs. The Selected Remedy is intended to address mine waste contamination and EPA's highest priority is the protection of human health, including the sensitive population, children under the age of 7 years. Also see response to Comment No. I58-2.

Response to comment I790-4
See responses to Comment Nos. I54-2 and I58-5.

Response to comment I790-5
EPA disagrees with the comment. Implementation of the Selected Remedy will not restrict private property rights in violation of law or the U.S. Constitution.

Fagerness, Douglas, I607, Letter 617790



Cleanup the Upper Coeur d'Alene Basin
Douglas Fagerness to: CDABasin 11/17/2010 08:30 AM
Please respond to dfagerness

I607-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I607-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I607-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Douglas Fagerness
2608
N. 10th PL
Coeur d'Alene, ID 83815-4930

617790

Response to comment I607-1

See response to Comment No. I295-1.

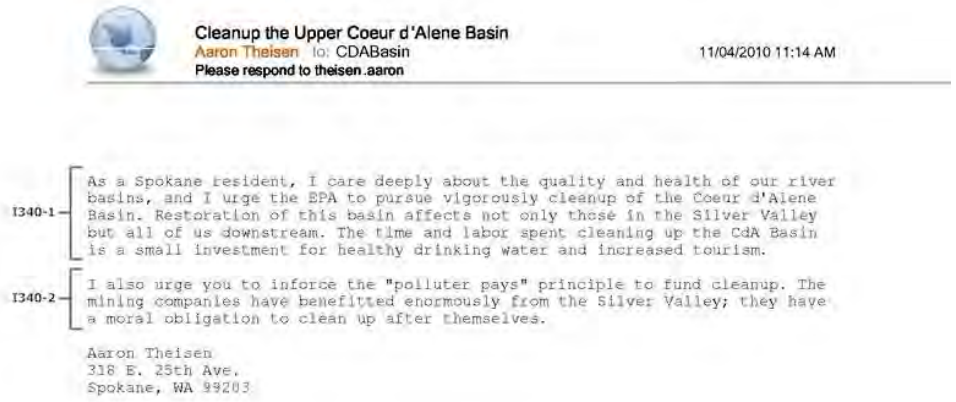
Response to comment I607-2

See response to Comment No. I295-2.

Response to comment I607-3

See response to Comment No. I295-3.

Theisen, Aaron, I340, Letter 614470



Cleanup the Upper Coeur d'Alene Basin
Aaron Theisen to: CDABasin 11/04/2010 11:14 AM
Please respond to theisen.aaron

I340-1 As a Spokane resident, I care deeply about the quality and health of our river basins, and I urge the EPA to pursue vigorously cleanup of the Coeur d'Alene Basin. Restoration of this basin affects not only those in the Silver Valley but all of us downstream. The time and labor spent cleaning up the CdA Basin is a small investment for healthy drinking water and increased tourism.

I340-2 I also urge you to inforce the "polluter pays" principle to fund cleanup. The mining companies have benefitted enormously from the Silver Valley; they have a moral obligation to clean up after themselves.

Aaron Theisen
318 E. 25th Ave.
Spokane, WA 99203

614470

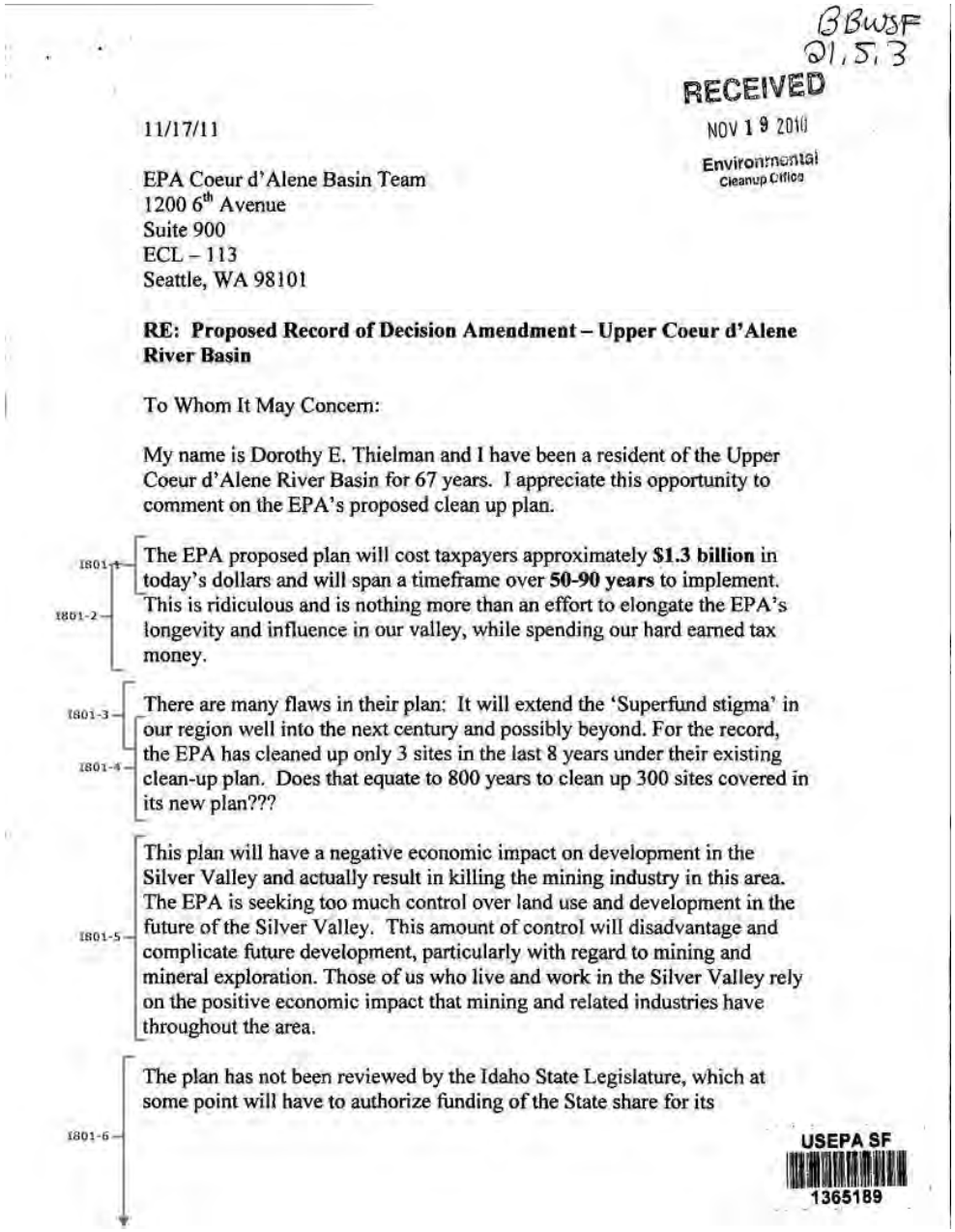
Response to comment I340-1

Thank you for your comment.

Response to comment I340-2

See response to Comment No. I295-3.

Thielman, Dorothy, I801, Letter 1365189



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21,5,3

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NOV 19 2010
Environmental
Cleanup Office

11/17/11

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL – 113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

My name is Dorothy E. Thielman and I have been a resident of the Upper Coeur d'Alene River Basin for 67 years. I appreciate this opportunity to comment on the EPA's proposed clean up plan.

I801-1, I801-2: The EPA proposed plan will cost taxpayers approximately **$1.3 billion** in today's dollars and will span a timeframe over **50-90 years** to implement. This is ridiculous and is nothing more than an effort to elongate the EPA's longevity and influence in our valley, while spending our hard earned tax money.

I801-3, I801-4: There are many flaws in their plan: It will extend the 'Superfund stigma' in our region well into the next century and possibly beyond. For the record, the EPA has cleaned up only 3 sites in the last 8 years under their existing clean-up plan. Does that equate to 800 years to clean up 300 sites covered in its new plan???

I801-5: This plan will have a negative economic impact on development in the Silver Valley and actually result in killing the mining industry in this area. The EPA is seeking too much control over land use and development in the future of the Silver Valley. This amount of control will disadvantage and complicate future development, particularly with regard to mining and mineral exploration. Those of us who live and work in the Silver Valley rely on the positive economic impact that mining and related industries have throughout the area.

I801-6: The plan has not been reviewed by the Idaho State Legislature, which at some point will have to authorize funding of the State share for its

USEPA SF
1365189

Response to comment I801-1
See responses to Comment Nos. I58-1, and I58-2.

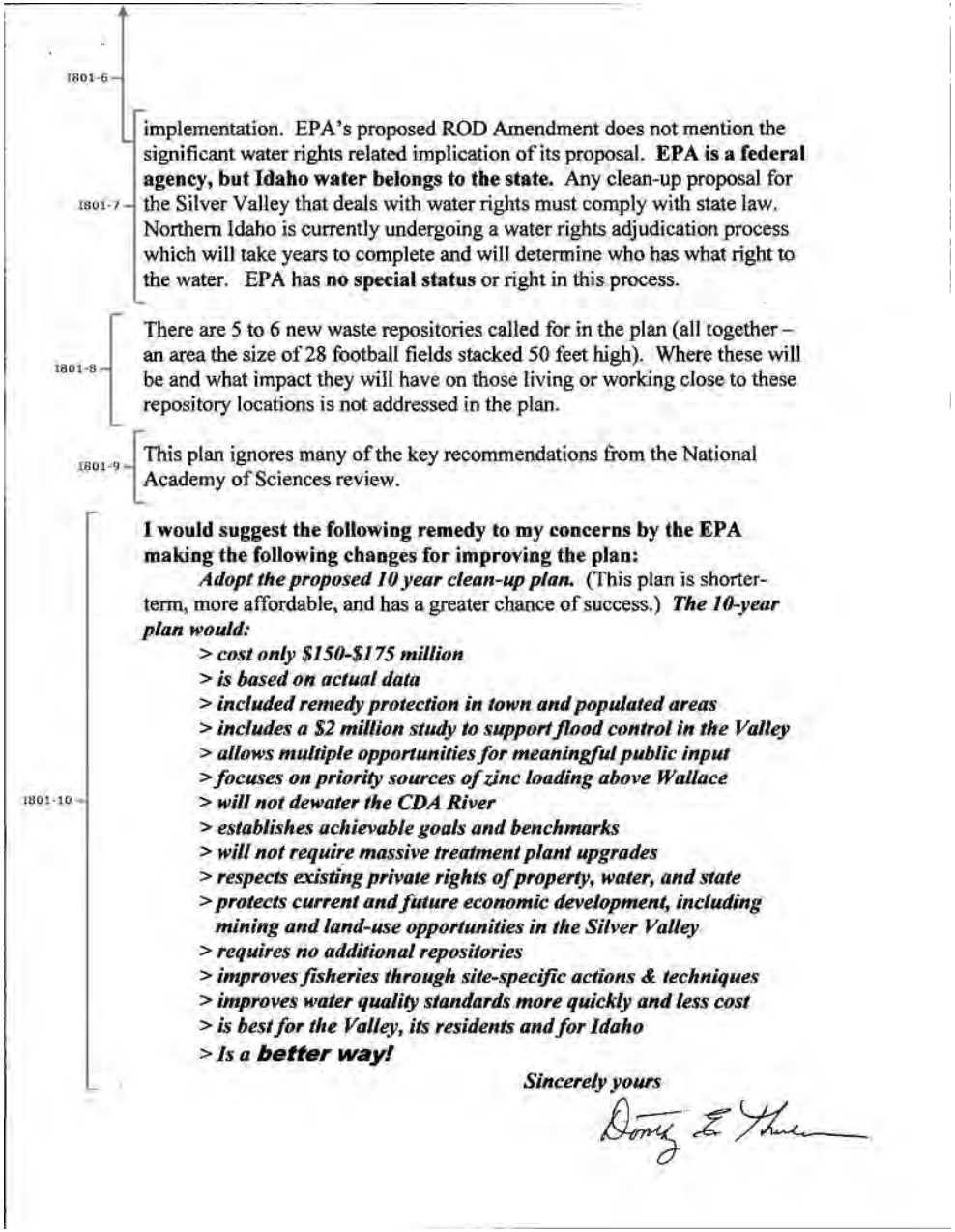
Response to comment I801-2
See response to Comment No. I58-1.

Response to comment I801-3
See response to comment I474-1.

Response to comment I801-4
See response to Comment No. I58-1.

Response to comment I801-5
See responses to Comment Nos. I54-2 and I58-5.

Response to comment I801-6
See responses to Comment Nos. LJ39-5 and I295-3.



I801-6

implementation. EPA's proposed ROD Amendment does not mention the significant water rights related implication of its proposal. **EPA is a federal agency, but Idaho water belongs to the state.** Any clean-up proposal for the Silver Valley that deals with water rights must comply with state law. Northern Idaho is currently undergoing a water rights adjudication process which will take years to complete and will determine who has what right to the water. EPA has **no special status** or right in this process.

I801-7

There are 5 to 6 new waste repositories called for in the plan (all together – an area the size of 28 football fields stacked 50 feet high). Where these will be and what impact they will have on those living or working close to these repository locations is not addressed in the plan.

I801-8

This plan ignores many of the key recommendations from the National Academy of Sciences review.

I801-9

I would suggest the following remedy to my concerns by the EPA making the following changes for improving the plan:

Adopt the proposed 10 year clean-up plan. (This plan is shorter-term, more affordable, and has a greater chance of success.) ***The 10-year plan would:***

> cost only $150-$175 million
> is based on actual data
> included remedy protection in town and populated areas
> includes a $2 million study to support flood control in the Valley
> allows multiple opportunities for meaningful public input
> focuses on priority sources of zinc loading above Wallace
> will not dewater the CDA River
> establishes achievable goals and benchmarks
> will not require massive treatment plant upgrades
> respects existing private rights of property, water, and state
> protects current and future economic development, including mining and land-use opportunities in the Silver Valley
> requires no additional repositories
> improves fisheries through site-specific actions & techniques
> improves water quality standards more quickly and less cost
> is best for the Valley, its residents and for Idaho
> Is a better way!

I801-10

Sincerely yours

Donny E Thurman

Response to comment I801-7

As it implements the Selected Remedy EPA intends to satisfy State water law as required by CERCLA. See response to Comment No. SA4-12 and the ROD Amendment, Part 3, Section 3.7.4.

Response to comment I801-8

See response to Comment No. I58-1 regarding the reduction in scope of the ROD Amendment compared to the Preferred Alternative identified in the Proposed Plan. See response to Comment No. I54-3 regarding repositories.

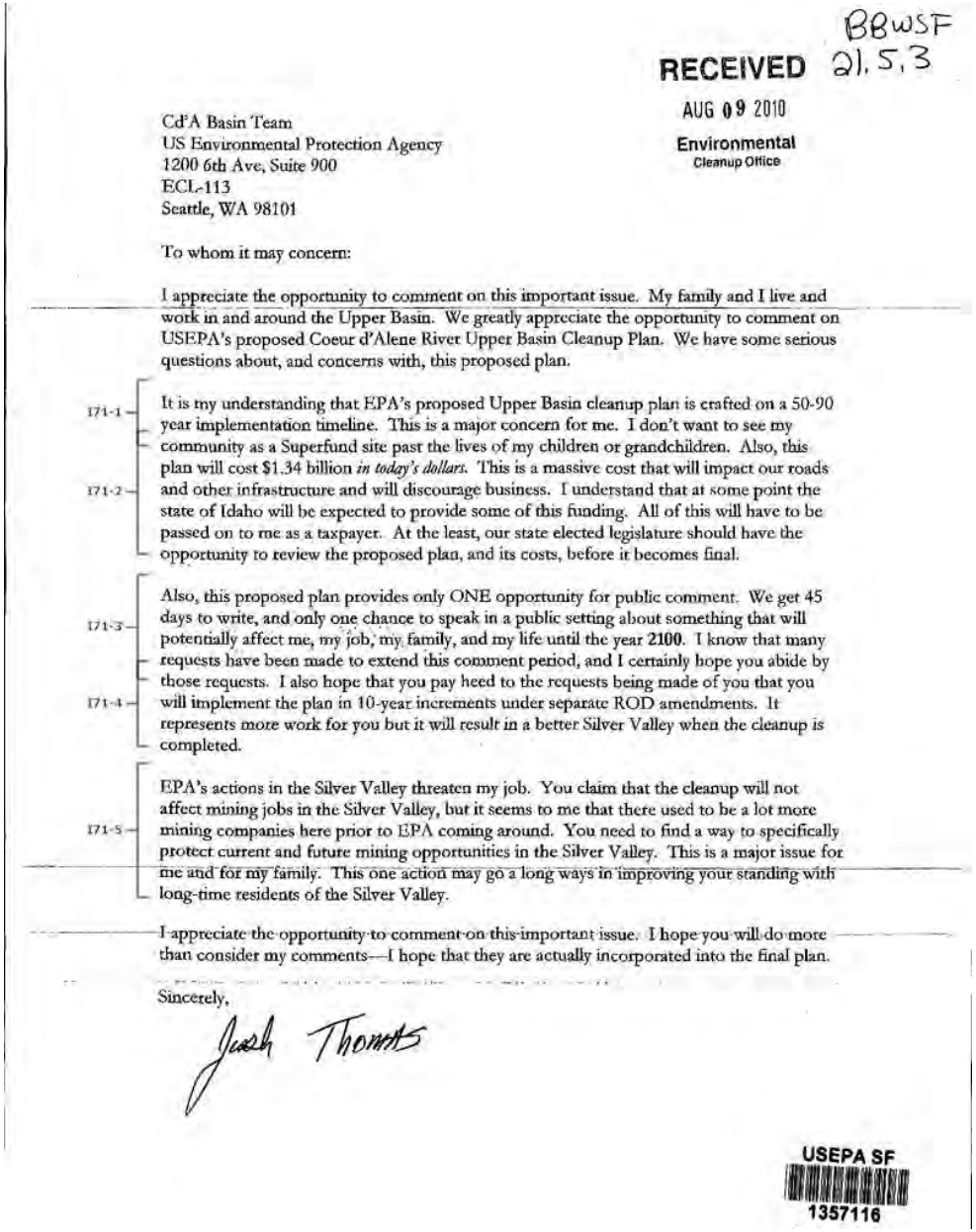
Response to comment I801-9

See response to Comment No. LJ27-8.

Response to comment I801-10

See response to Comment No. I474-2.

Thomas, Josh, I71, Letter 1357116



BBWSF 21.5.3

RECEIVED
AUG 09 2010
Environmental Cleanup Office

CdA Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I71-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I71-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I71-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you
I71-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I71-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Josh Thomas

USEPA SF
1357116

Response to comment I71-1
See response to Comment No. I58-1.

Response to comment I71-2
See response to Comment No. I58-2.

Response to comment I71-3
See response to Comment No. I58-3.

Response to comment I71-4
See response to Comment No. I58-4.

Response to comment I71-5
See response to Comment No. I58-5.

Thomas, Steven, I427, Letter 616331

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

sb-thomasw@hotmail.com to: formsubmission 11/11/2010 02:04 PM

Sent by: Sb-Thomasw@Hotmail.Com <sb-thomasw=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Steven Thomas
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 milllon will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. The EPA claims that the plan will provide jobs. Unfortunately these jobs tend to be seasonal and are not jobs that the Silver Valley needs like mining jobs.
Coeur d'Alene Basin Resident: Yes
Email Address: sb-thomasw@hotmail.com
Mailing Address: P.O. Box 195, 104 Memory Lane|Smeiterville|ID|83868|US
Phone Number:

I427-1

I427-2

616331

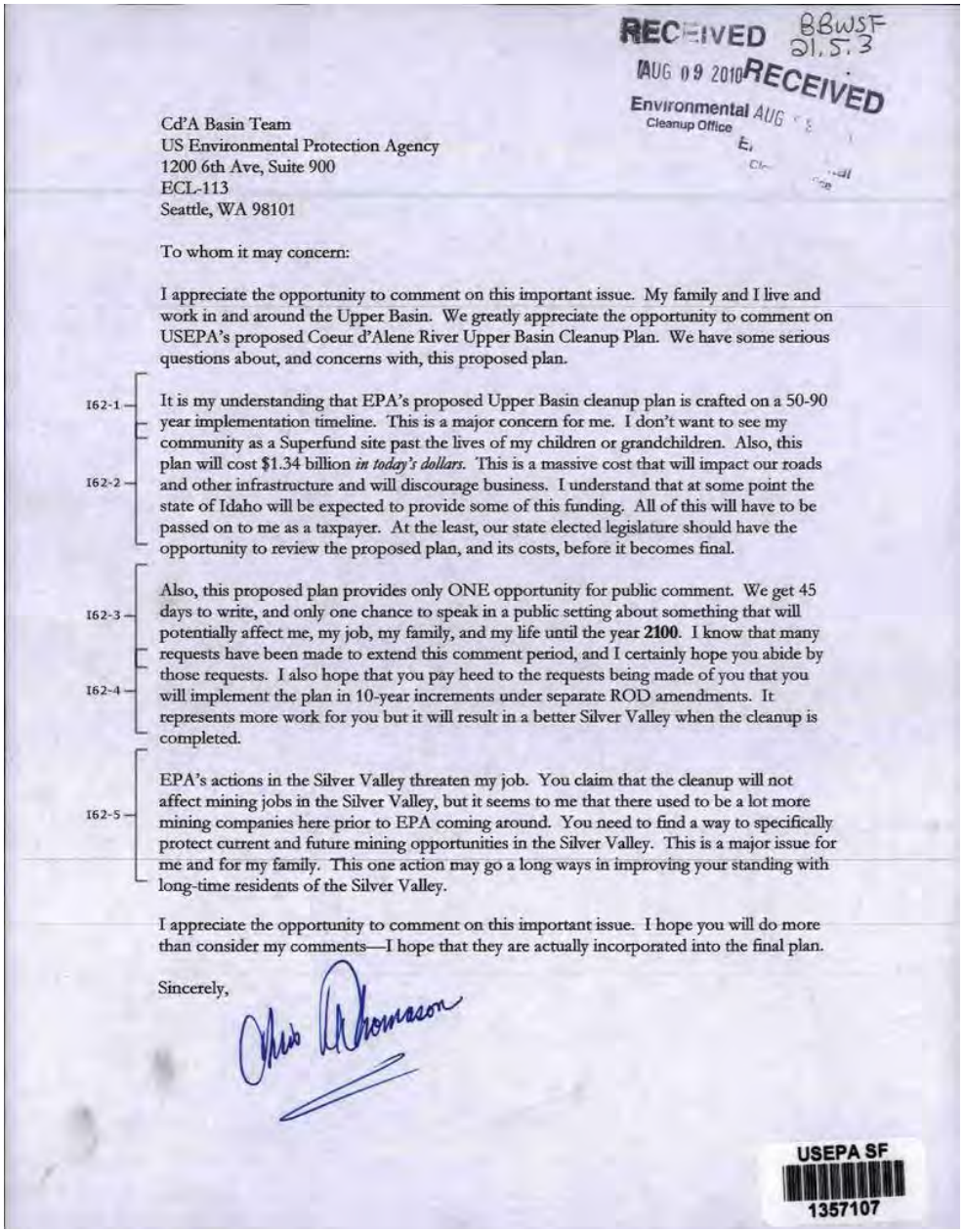
Response to comment I427-1

See response to Comment No. I351-1.

Response to comment I427-2

See responses to Comment Nos. I54-2 and LC32-2.

Thomason, Chris, I62, Letter 1357107



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AUG 09 2010 RECEIVED
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Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I62-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I62-2

I62-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I62-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I62-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Chris Thomason

USEPA SF
1357107

Response to comment I62-1
See response to Comment No. I58-1.

Response to comment I62-2
See response to Comment No. I58-2.

Response to comment I62-3
See response to Comment No. I58-3.

Response to comment I62-4
See response to Comment No. I58-4.

Response to comment I62-5
See response to Comment No. I58-5.

Thompson, Dan, I219, Letter 610097-14

No comments

to try to stay at two minutes. Thank you. So we can hear from everybody.

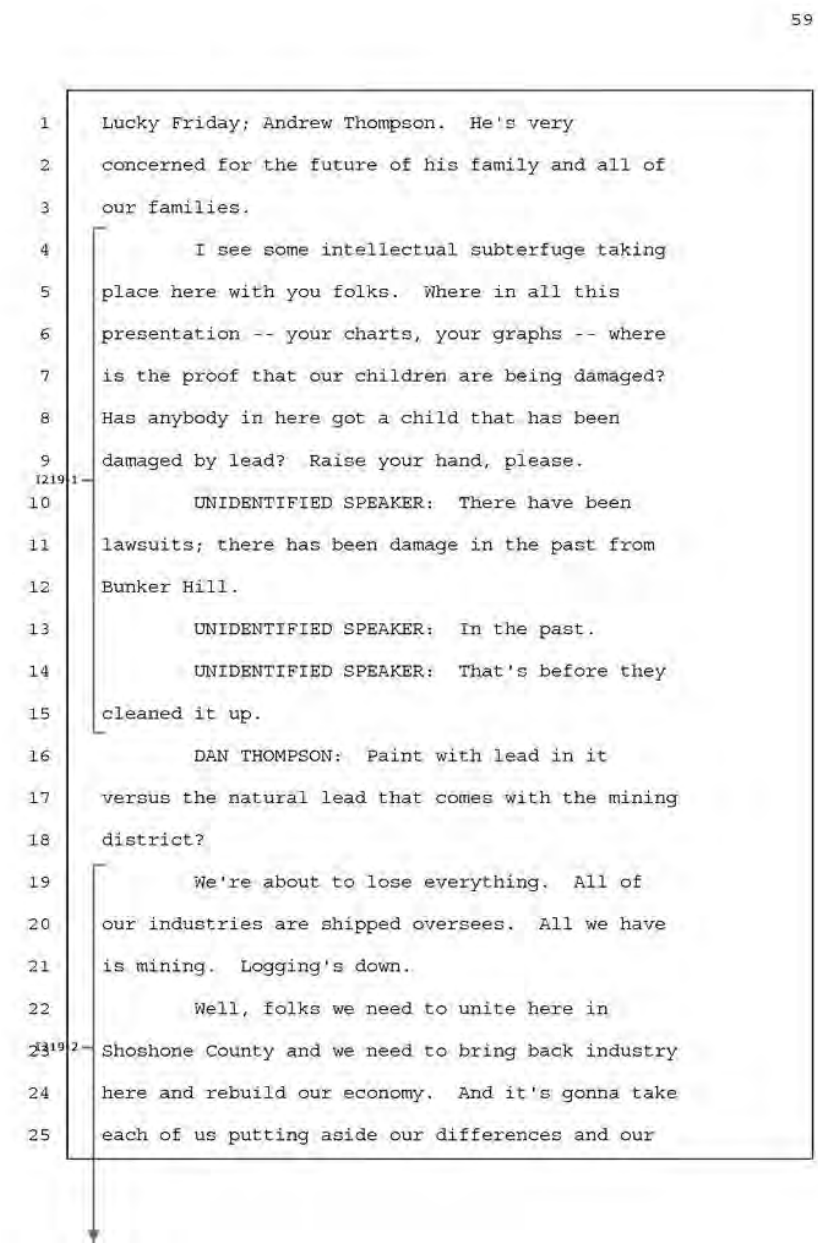
BARBARA GAGNE: My name is Barbara. My husband and I are recent transplants to the Silver Valley. I don't know a lot about mining, but I do know how happy we've been in the Silver Valley since we moved here and what an absolute jewel you all have here.

I'm a retired medical professional, and I have seen the results of lead poisoning. Quite frankly, I think the claims by the EPA are greatly exaggerated, and I doubt if anyone can guarantee that we will not get sick from something somewhere, someday, somehow. Everything we eat, drink, and breathe has the potential of harming us in some way.

I don't need the federal government to tell me how to live my life, take care of my property, or watch out for my own future. Thank you.

BOB WHEELER: Thank you, Barbara. Dan Thompson, Eric Carlson after that, and then David Sherman. Dan Thompson?

DAN THOMPSON: Good evening, folks. My son wanted to be here tonight; he works up at the



59

Lucky Friday; Andrew Thompson. He's very concerned for the future of his family and all of our families.

I see some intellectual subterfuge taking place here with you folks. Where in all this presentation -- your charts, your graphs -- where is the proof that our children are being damaged? Has anybody in here got a child that has been damaged by lead? Raise your hand, please. I219-1

UNIDENTIFIED SPEAKER: There have been lawsuits; there has been damage in the past from Bunker Hill.

UNIDENTIFIED SPEAKER: In the past.

UNIDENTIFIED SPEAKER: That's before they cleaned it up.

DAN THOMPSON: Paint with lead in it versus the natural lead that comes with the mining district?

We're about to lose everything. All of our industries are shipped oversees. All we have is mining. Logging's down.

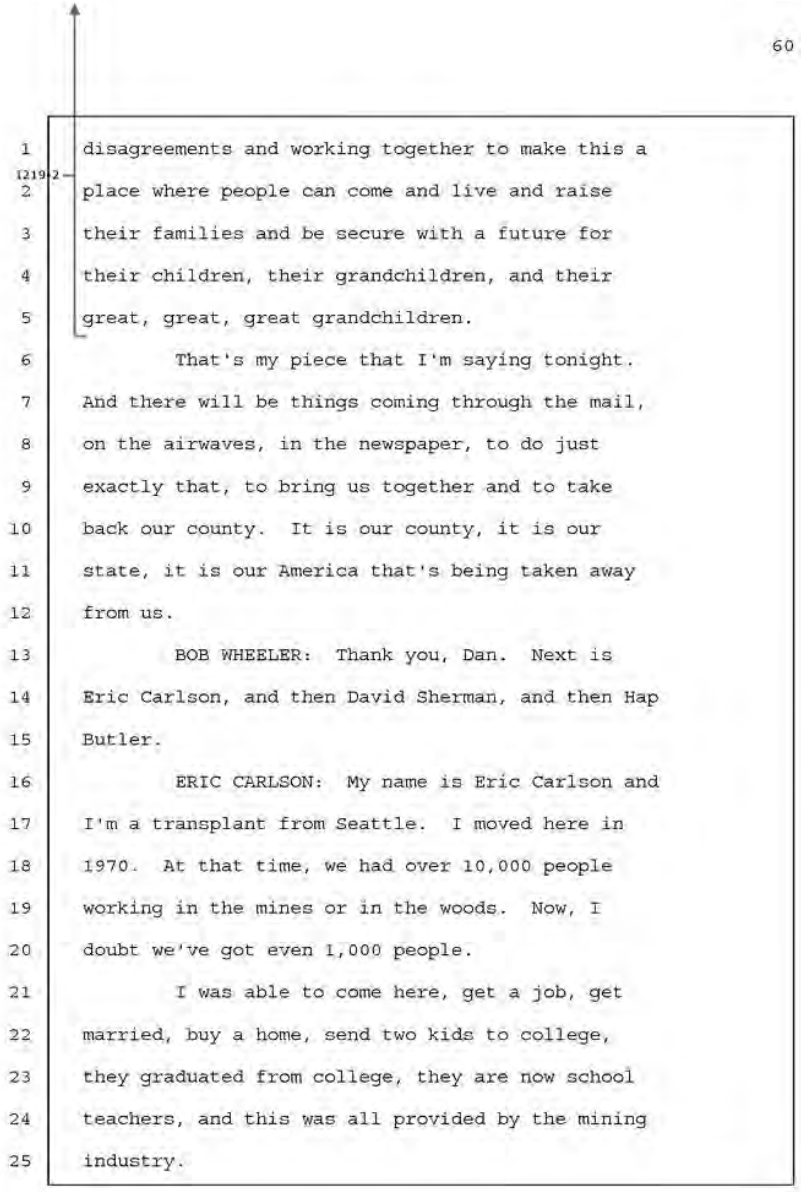
Well, folks we need to unite here in Shoshone County and we need to bring back industry here and rebuild our economy. And it's gonna take each of us putting aside our differences and our I219-2

Response to comment I219-1

EPA is required under CERCLA, the Superfund law, to address unacceptable risks to human health and the environment at the Bunker Hill Superfund Site. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Basin, there is still contamination in site soil, sediments, groundwater, and surface water that poses unacceptable risks to human health and the environment. 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 areas of the Upper Basin. There is substantial documentation of the contamination levels and risks posed. The Upper Basin cleanup is essential to reducing these risks.

Response to comment I219-2

See responses to Comment Nos. I58-5 and I54-2.



60

disagreements and working together to make this a
I219-2
place where people can come and live and raise
their families and be secure with a future for
their children, their grandchildren, and their
great, great, great grandchildren.

That's my piece that I'm saying tonight.
And there will be things coming through the mail,
on the airwaves, in the newspaper, to do just
exactly that, to bring us together and to take
back our county. It is our county, it is our
state, it is our America that's being taken away
from us.

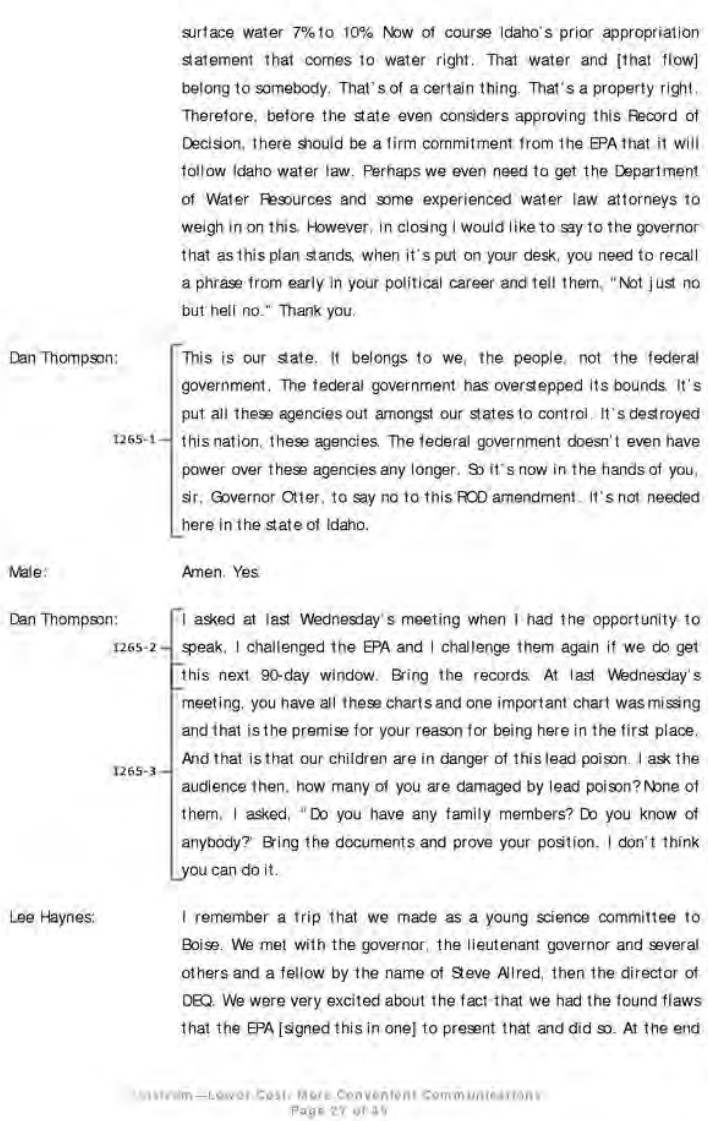
BOB WHEELER: Thank you, Dan. Next is
Eric Carlson, and then David Sherman, and then Hap
Butler.

ERIC CARLSON: My name is Eric Carlson and
I'm a transplant from Seattle. I moved here in
1970. At that time, we had over 10,000 people
working in the mines or in the woods. Now, I
doubt we've got even 1,000 people.

I was able to come here, get a job, get
married, buy a home, send two kids to college,
they graduated from college, they are now school
teachers, and this was all provided by the mining
industry.

No comments

Thompson, Dan, I265, Letter 616015-29



surface water 7% to 10% Now of course Idaho's prior appropriation statement that comes to water right. That water and [that flow] belong to somebody. That's of a certain thing. That's a property right. Therefore, before the state even considers approving this Record of Decision, there should be a firm commitment from the EPA that it will follow Idaho water law. Perhaps we even need to get the Department of Water Resources and some experienced water law attorneys to weigh in on this. However, in closing I would like to say to the governor that as this plan stands, when it's put on your desk, you need to recall a phrase from early in your political career and tell them, "Not just no but hell no." Thank you.

Dan Thompson: This is our state. It belongs to we, the people, not the federal government. The federal government has overstepped its bounds. It's put all these agencies out amongst our states to control. It's destroyed this nation, these agencies. The federal government doesn't even have power over these agencies any longer. So it's now in the hands of you, sir, Governor Otter, to say no to this ROD amendment. It's not needed here in the state of Idaho. I265-1

Male: Amen. Yes.

Dan Thompson: I asked at last Wednesday's meeting when I had the opportunity to speak, I challenged the EPA and I challenge them again if we do get this next 90-day window. Bring the records. At last Wednesday's meeting, you have all these charts and one important chart was missing and that is the premise for your reason for being here in the first place. And that is that our children are in danger of this lead poison. I ask the audience then, how many of you are damaged by lead poison? None of them, I asked, "Do you have any family members? Do you know of anybody?" Bring the documents and prove your position. I don't think you can do it. I265-2 I265-3

Lee Haynes: I remember a trip that we made as a young science committee to Boise. We met with the governor, the lieutenant governor and several others and a fellow by the name of Steve Allred, then the director of DEQ. We were very excited about the fact that we had the found flaws that the EPA [signed this in one] to present that and did so. At the end

Response to comment I265-1

Comment noted.

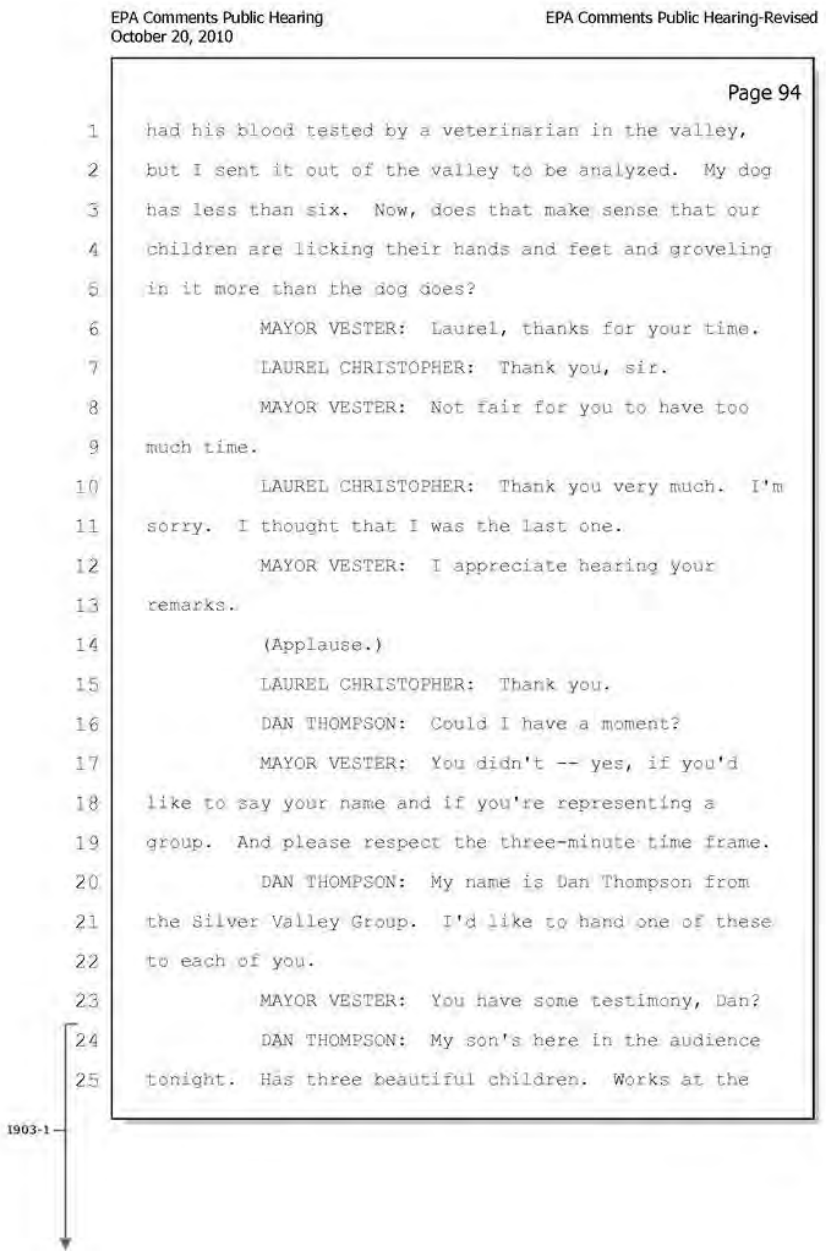
Response to comment I265-2

EPA and other agencies have conducted many studies over the years that document the human health risks posed by contamination in the Coeur d'Alene Basin. The primary human health concern in the Coeur d'Alene Basin is excessive lead in the blood of young children and pregnant women. Also, see response to Comment No. I295-1.

Response to comment I265-3

See response to Comment No. I295-1.

Thompson, Dan, I903, Letter 619651-38



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

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had his blood tested by a veterinarian in the valley, but I sent it out of the valley to be analyzed. My dog has less than six. Now, does that make sense that our children are licking their hands and feet and groveling in it more than the dog does?

MAYOR VESTER: Laurel, thanks for your time.

LAUREL CHRISTOPHER: Thank you, sir.

MAYOR VESTER: Not fair for you to have too much time.

LAUREL CHRISTOPHER: Thank you very much. I'm sorry. I thought that I was the last one.

MAYOR VESTER: I appreciate hearing your remarks.

(Applause.)

LAUREL CHRISTOPHER: Thank you.

DAN THOMPSON: Could I have a moment?

MAYOR VESTER: You didn't -- yes, if you'd like to say your name and if you're representing a group. And please respect the three-minute time frame.

DAN THOMPSON: My name is Dan Thompson from the Silver Valley Group. I'd like to hand one of these to each of you.

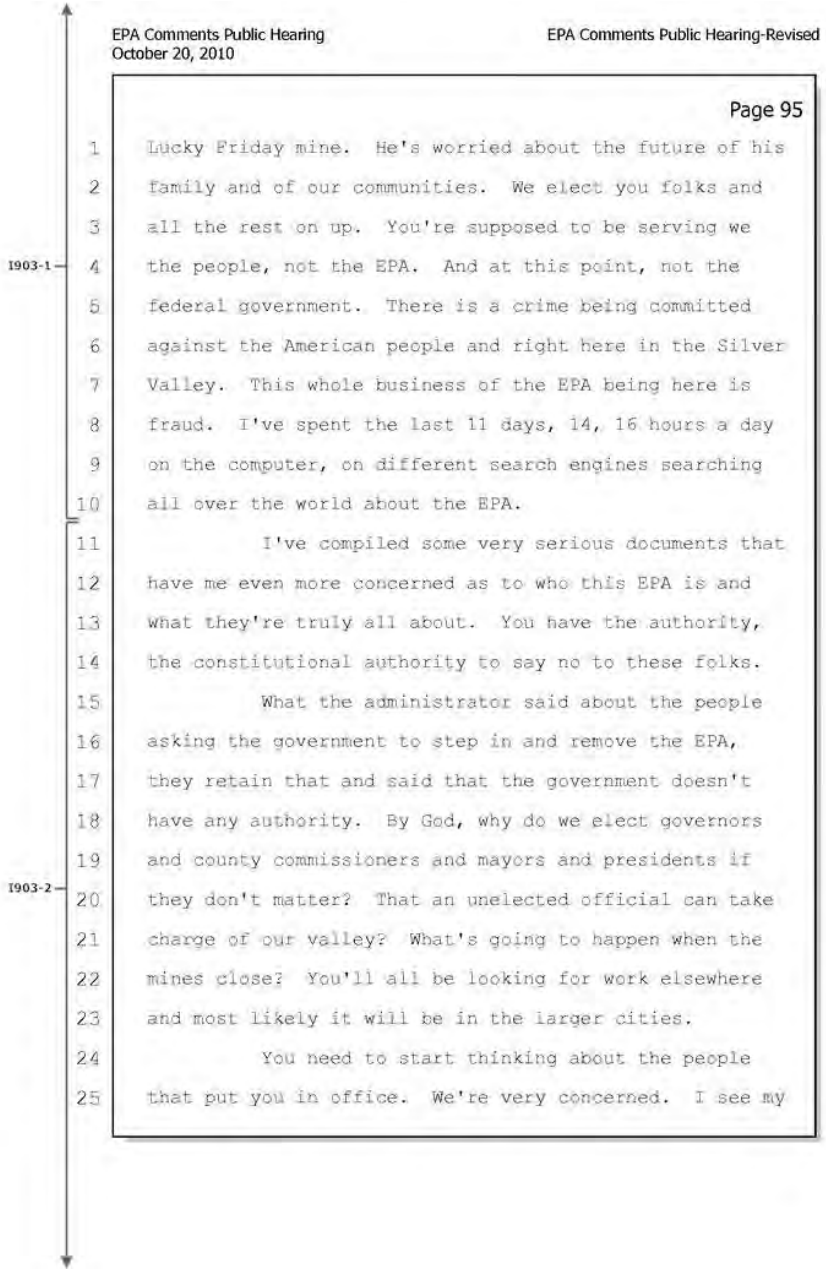
MAYOR VESTER: You have some testimony, Dan?

DAN THOMPSON: My son's here in the audience tonight. Has three beautiful children. Works at the

I903-1

Response to comment I903-1

Under the Superfund law, EPA has a responsibility and the authority to take actions to protect people's health and the environment. See response to Comment No. I58-5.



EPA Comments Public Hearing
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I903-1 Lucky Friday mine. He's worried about the future of his family and of our communities. We elect you folks and all the rest on up. You're supposed to be serving we the people, not the EPA. And at this point, not the federal government. There is a crime being committed against the American people and right here in the Silver Valley. This whole business of the EPA being here is fraud. I've spent the last 11 days, 14, 16 hours a day on the computer, on different search engines searching all over the world about the EPA.

I've compiled some very serious documents that have me even more concerned as to who this EPA is and what they're truly all about. You have the authority, the constitutional authority to say no to these folks.

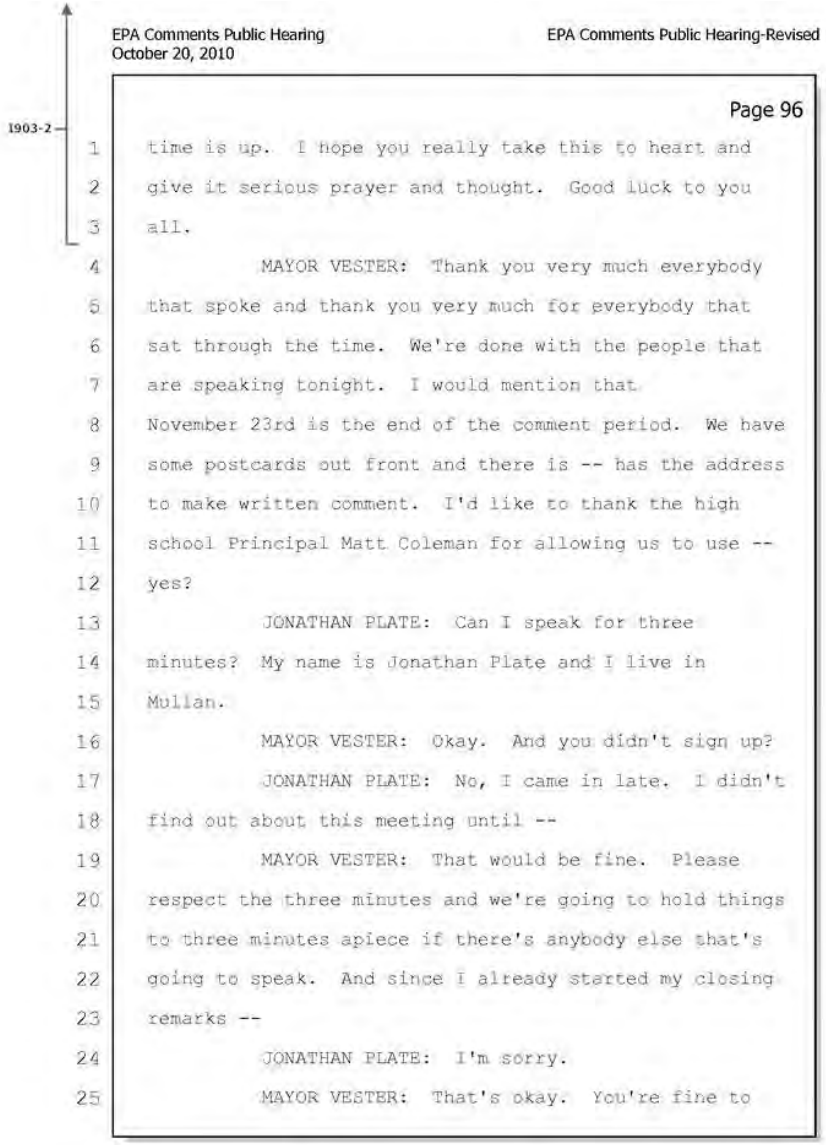
What the administrator said about the people asking the government to step in and remove the EPA, they retain that and said that the government doesn't have any authority. By God, why do we elect governors and county commissioners and mayors and presidents if

I903-2 they don't matter? That an unelected official can take charge of our valley? What's going to happen when the mines close? You'll all be looking for work elsewhere and most likely it will be in the larger cities.

You need to start thinking about the people that put you in office. We're very concerned. I see my

Response to comment I903-2

See responses to Comments No. LJ39-5 and I58-5.



EPA Comments Public Hearing
October 20, 2010

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Page 96

1903-2

time is up. I hope you really take this to heart and give it serious prayer and thought. Good luck to you all.

MAYOR VESTER: Thank you very much everybody that spoke and thank you very much for everybody that sat through the time. We're done with the people that are speaking tonight. I would mention that November 23rd is the end of the comment period. We have some postcards out front and there is -- has the address to make written comment. I'd like to thank the high school Principal Matt Coleman for allowing us to use -- yes?

JONATHAN PLATE: Can I speak for three minutes? My name is Jonathan Plate and I live in Mullan.

MAYOR VESTER: Okay. And you didn't sign up?

JONATHAN PLATE: No, I came in late. I didn't find out about this meeting until --

MAYOR VESTER: That would be fine. Please respect the three minutes and we're going to hold things to three minutes apiece if there's anybody else that's going to speak. And since I already started my closing remarks --

JONATHAN PLATE: I'm sorry.

MAYOR VESTER: That's okay. You're fine to

Thompson, Thomas, I769, Letter 618767

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
thompsontommyt@aol.com to: formsubmission 11/18/2010 09:36 PM
Sent by: Thompsontommyt@Aol.Com <thompsontommyt=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Tommy Thompson
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. EPA is overstepping their expertise and becoming too much like a gestapo regime!! It's time to back off and let the local people deal with any problems.
Coeur d'Alene Basin Resident: No
Email Address: thompsontommyt@aol.com
Mailing Address: 8205 White Falls Drive|Reno|NV|89506|US
Phone Number:

I769-1

I769-2

618767

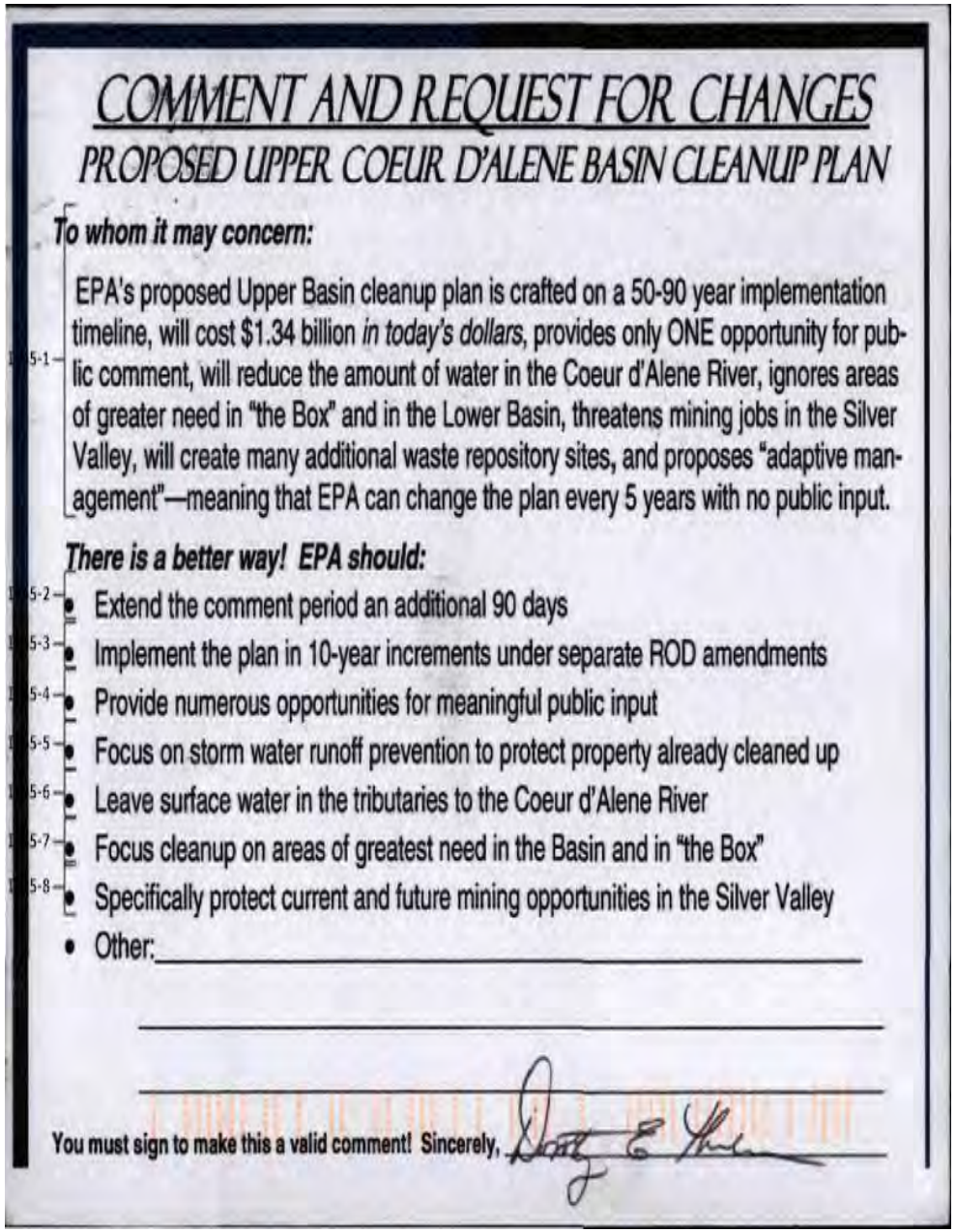
Response to comment I769-1

See response to Comment No. I351-1.

Response to comment I769-2

See response to Comment No. LJ39-5

Thotson, Dorthy, I145, Letter 1357281



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I145-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I145-2 Extend the comment period an additional 90 days
- I145-3 Implement the plan in 10-year increments under separate ROD amendments
- I145-4 Provide numerous opportunities for meaningful public input
- I145-5 Focus on storm water runoff prevention to protect property already cleaned up
- I145-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I145-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I145-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, Dorthy E Thotson

Response to comment I145-1
See response to Comment No. I25-1.

Response to comment I145-2
See response to Comment No. I25-2.

Response to comment I145-3
See response to Comment No. I25-3.

Response to comment I145-4
See response to Comment No. I25-4.

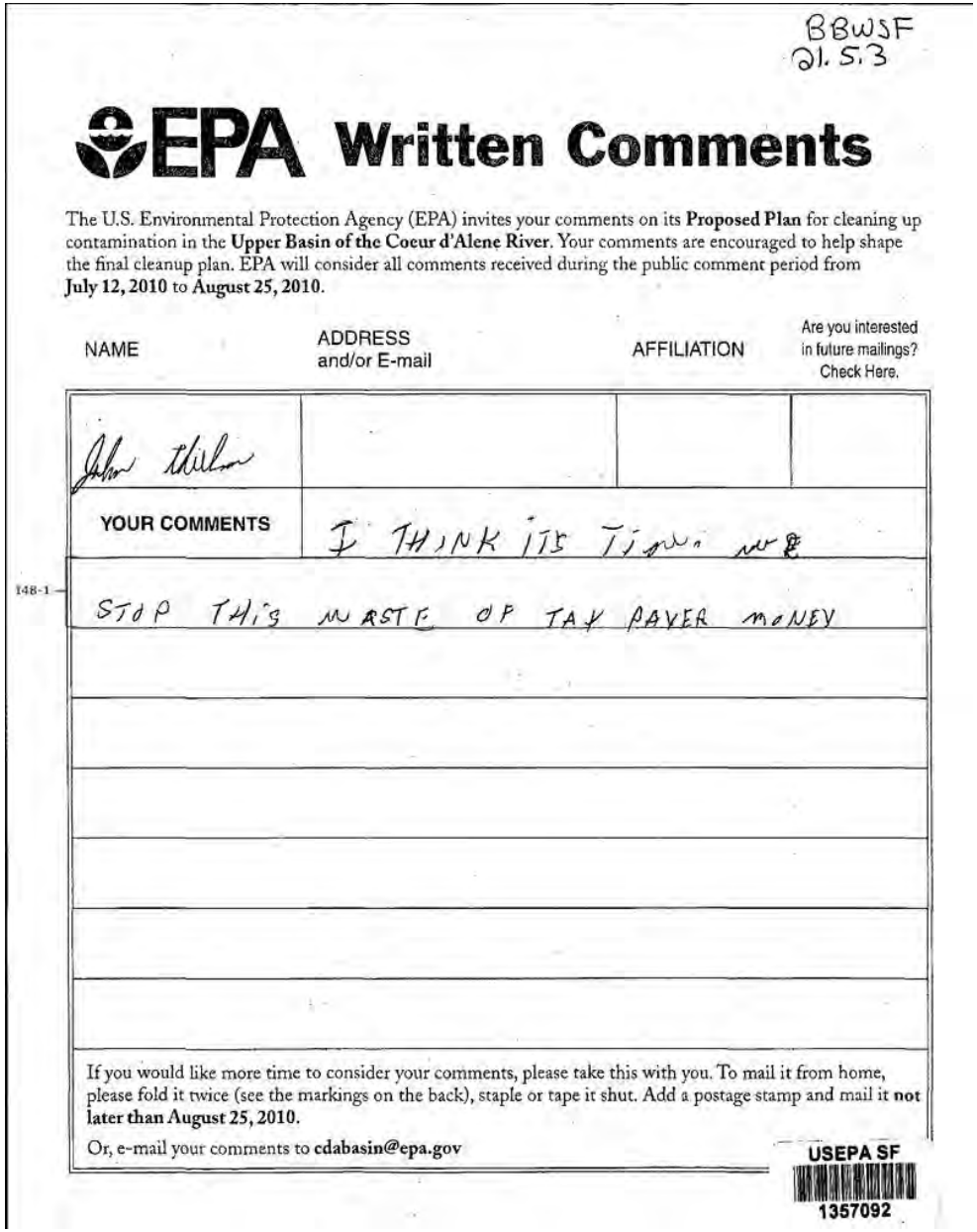
Response to comment I145-5
See response to Comment No. I25-5.

Response to comment I145-6
See response to Comment No. I25-6.

Response to comment I145-7
See response to Comment No. I25-7.

Response to comment I145-8
See response to Comment No. I25-8.

Thulom, John, I48, Letter 1357092



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
John Thulom			

YOUR COMMENTS

I THINK IT'S TIME WE

I48-1 STOP THIS WASTE OF TAX PAYER MONEY

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357092

Response to comment I48-1

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. See response to Comment No. I295-3.

Thurston, John, I770, Letter 618768

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
JThurston@WorkSharper.com to: formsubmission 11/19/2010 02:23 PM
Sent by: JThurston@WorkSharper.com <JThurston=WorkSharper.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: John Thurston
Date: 11/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billIon in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil—all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: JThurston@WorkSharper.com
Mailing Address: 3640 Cederblom St.|Coeur d'Alene|ID|83815|US
Phone Number:

I770-1

618768

Response to comment I770-1

See response to Comment No. I351-1.

Thurston, Karen, I771, Letter 618769

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

KarenThurston@WASKIA.com to: formsubmission 11/18/2010 07:42 PM

Sent by: KarenThurston@WASKIA.com <KarenThurston=WASKIA.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Karen Thurston
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons as I've noted below:
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I771-1

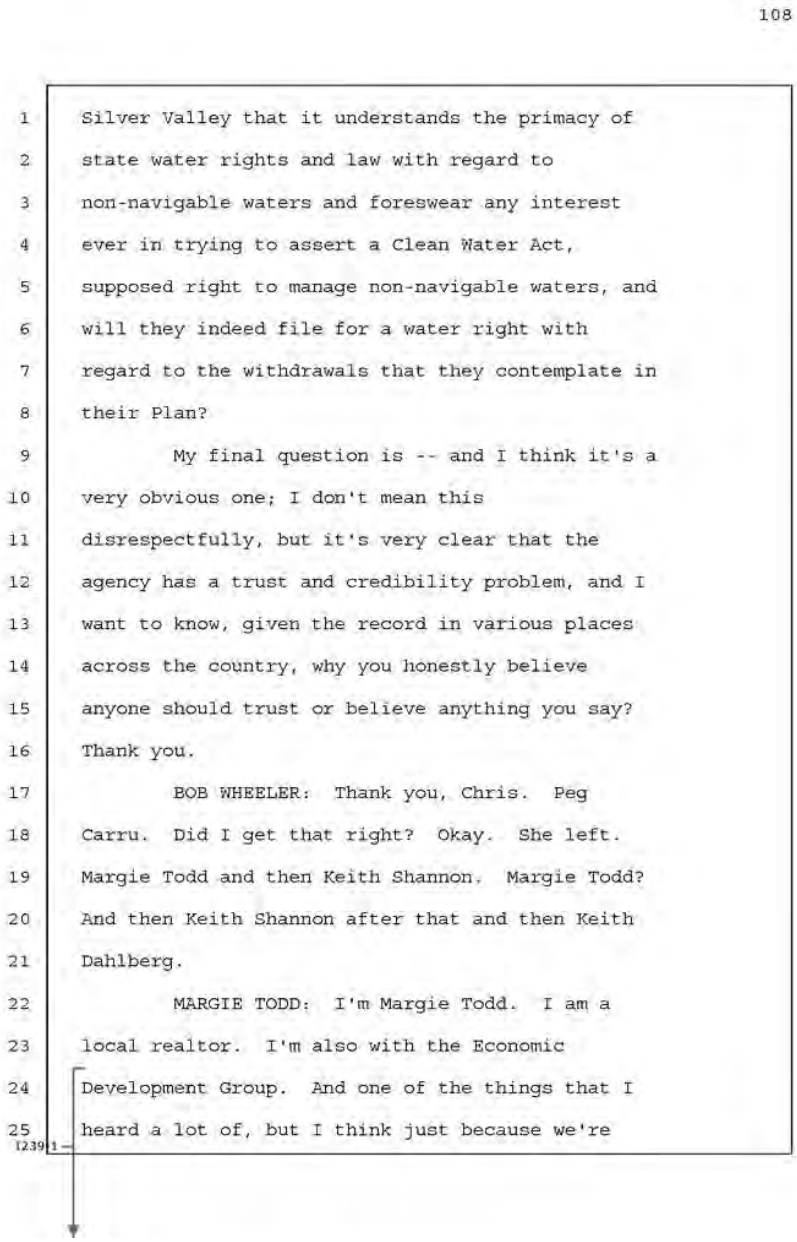
Any plan with a longer time frame than 10 years contains more risk than can be properly managed, and cannot accurately determine future conditions with enough certainty.
Coeur d'Alene Basin Resident: Yes
Email Address: KarenThurston@WASKIA.com
Mailing Address: 3640 Cederblom St.|Coeur d'Alene|ID|83815|US
Phone Number: (208) 660-1359

618769

Response to comment I771-1

See response to Comment No. I351-1.

Todd, Margie, I239, Letter 610097-34



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Silver Valley that it understands the primacy of state water rights and law with regard to non-navigable waters and foreswear any interest ever in trying to assert a Clean Water Act, supposed right to manage non-navigable waters, and will they indeed file for a water right with regard to the withdrawals that they contemplate in their Plan?

My final question is -- and I think it's a very obvious one; I don't mean this disrespectfully, but it's very clear that the agency has a trust and credibility problem, and I want to know, given the record in various places across the country, why you honestly believe anyone should trust or believe anything you say? Thank you.

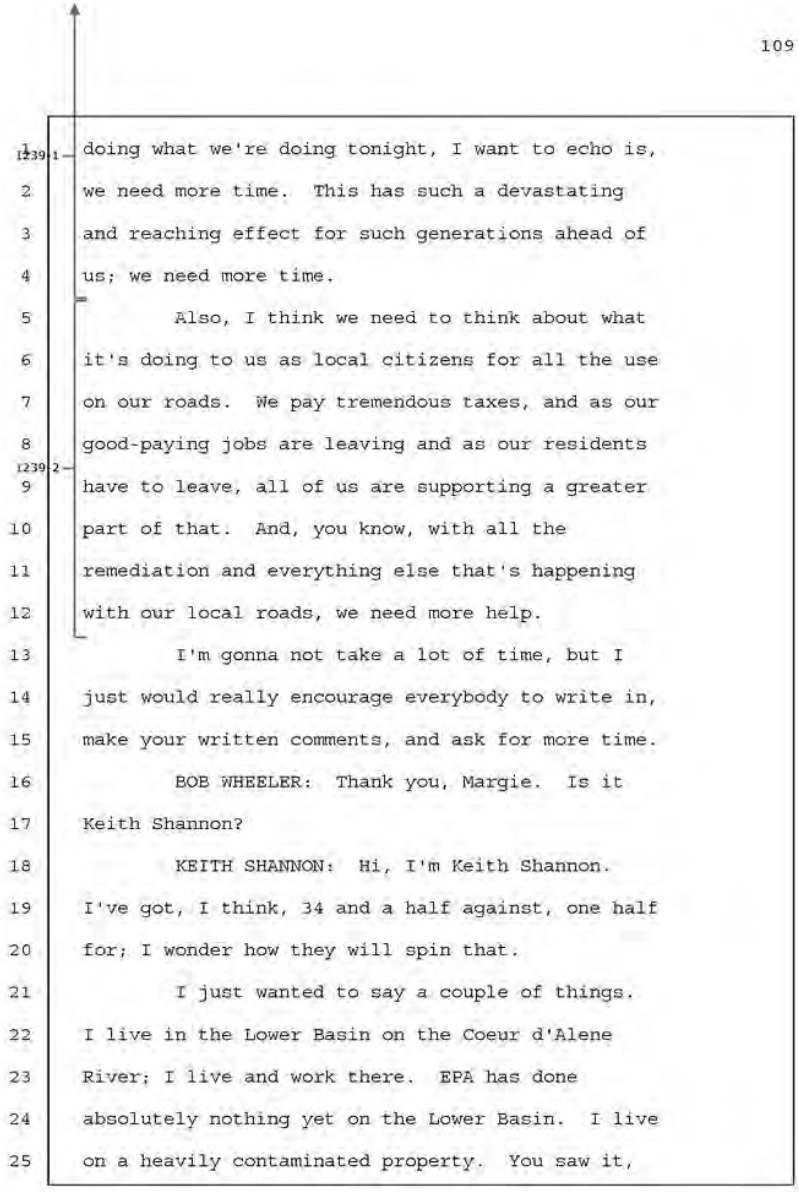
BOB WHEELER: Thank you, Chris. Peg Carru. Did I get that right? Okay. She left. Margie Todd and then Keith Shannon. Margie Todd? And then Keith Shannon after that and then Keith Dahlberg.

MARGIE TODD: I'm Margie Todd. I am a local realtor. I'm also with the Economic Development Group. And one of the things that I heard a lot of, but I think just because we're

I239-1

Response to comment I239-1

See response to Comment No. I54-6.



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I239-1 doing what we're doing tonight, I want to echo is, we need more time. This has such a devastating and reaching effect for such generations ahead of us; we need more time.

Also, I think we need to think about what it's doing to us as local citizens for all the use on our roads. We pay tremendous taxes, and as our good-paying jobs are leaving and as our residents

I239-2 have to leave, all of us are supporting a greater part of that. And, you know, with all the remediation and everything else that's happening with our local roads, we need more help.

I'm gonna not take a lot of time, but I just would really encourage everybody to write in, make your written comments, and ask for more time.

BOB WHEELER: Thank you, Margie. Is it Keith Shannon?

KEITH SHANNON: Hi, I'm Keith Shannon. I've got, I think, 34 and a half against, one half for; I wonder how they will spin that.

I just wanted to say a couple of things. I live in the Lower Basin on the Coeur d'Alene River; I live and work there. EPA has done absolutely nothing yet on the Lower Basin. I live on a heavily contaminated property. You saw it,

Response to comment I239-2

The Selected Remedy includes estimated costs for constructing roads to access sites and to repair damage to existing roads due to cleanup activities.

Toews, Trevor, I772, Letter 618770

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
ratgirl11@live.com to: formsubmission 11/19/2010 01:27 PM
Sent by: Ratgirl11@Live.Com <ratgirl11=live.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Trevor Toews
Date: 10/19/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. I am a life long resident of this valley. I hunt, fish, and recreate here. Along with most of my family and friends, I am employed by a local mining company. Implementing this EPA plan would be devastating to our economy because who wants to recreate in an environmental mess? My job would be in jeopardy, as well as everybody else who is making an honest living in this valley. Please listen to what we have to say.
Coeur d'Alene Basin Resident: Yes
Email Address: ratgirl11@live.com
Mailing Address: P. O. Box 25|Kellogg|Id|83837|US
Phone Number: (208) 699-4583

I772-1

I772-2

618770

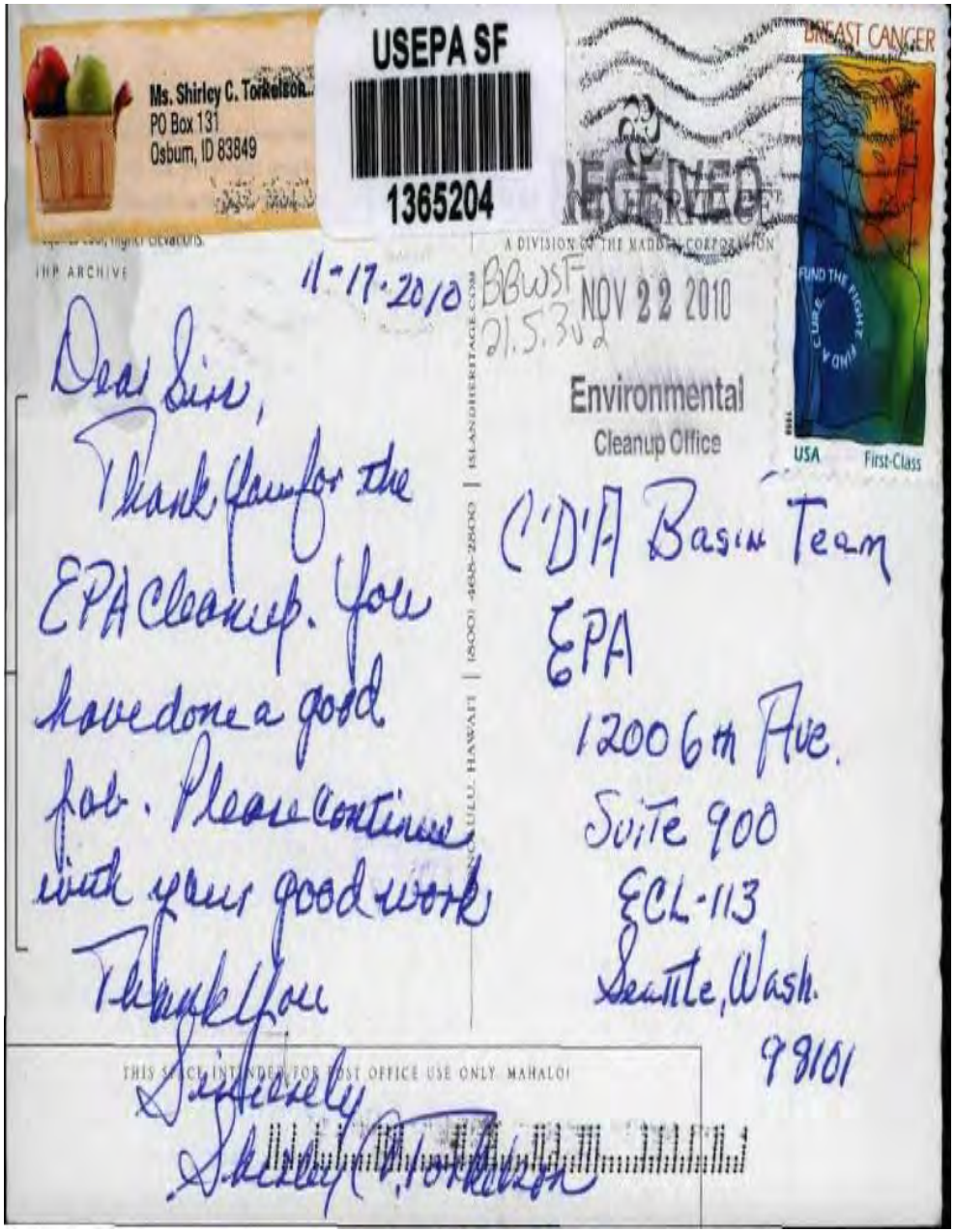
Response to comment I772-1

See response to Comment No. I351-1.

Response to comment I772-2

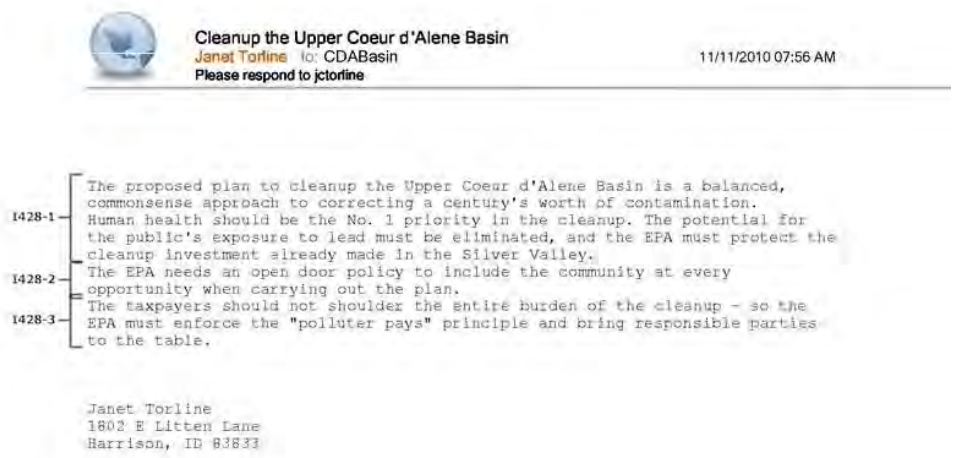
See responses to Comment Nos. I54-2 and I58-5.

Torkelson, Shirley C, I812, Letter 1365204



Response to comment I812-1
Thank you for your comment.

Torline, Janet, I428, Letter 616332



Cleanup the Upper Coeur d'Alene Basin
Janet Torline to: CDABasin 11/11/2010 07:56 AM
Please respond to jctorline

I428-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I428-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I428-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Janet Torline
1802 E Litten Lane
Harrison, ID 83833

616332

Response to comment I428-1

See response to Comment No. I295-1.

Response to comment I428-2

See response to Comment No. I295-2.

Response to comment I428-3

See response to Comment No. I295-3.

Tracy, Greg, I429, Letter 616333

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
gtracy2117@aol.com to: formsubmission 11/11/2010 10:18 AM
Sent by: Gtracy2117@Aol.Com <gtracy2117=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Greg Tracy
Date: 11/11/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I429-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. I have a lake home near Harrison Idaho located 711 S. Sublimity, Harrison ID.
Coeur d'Alene Basin Resident: Yes
Email Address: gtracy2117@aol.com
Mailing Address: 4314 South Pittsburg St.|Spokane|WA|99203|US
Phone Number:

616333

Response to comment I429-1

See response to Comment No. I351-1.

Traxler, Fred, I773, Letter 618771

Basin ROD Amendment Comments
ftraxler
to:
CDABasin
11/23/2010 04:23 AM
Please respond to ftraxler
Show Details

November 23, 2010

Comments from Fred Traxler, Kellogg, Idaho (ftraxler@usamedia.tv)

I am commenting in opposition to the new EPA ROD Amendment.

I773-1 It is time for the EPA to leave the Silver Valley and never return. Nearly every resident wants you to leave after decades of EPA domination and abuse.

I773-2 The EPA has almost decimated our mining industry. This is devious and dishonest. Mining had nothing to do with the original blood lead issues and you have not convinced us that mining is affecting the environment. Your presence discourages new industry from investing locally because of your actions and threats.

I773-3 EPA needs to have CTP discharge requirements and controls that are equivalent to the point source mining and wastewater discharge limits within the Silver Valley. Otherwise, all of the current limits need to be increased to match the EPAâ€™s actual performance. That is only fair.

I773-4 The EPA has failed to address potential flooding and runoff damage to its remediations and now views any fixes as a local responsibility. That is EPAâ€™s problem, not ours.

I773-5 The EPA has placed unreasonable controls and costs on every citizen, business and property owner. EPA destroyed our infrastructure with heavy equipment and says it is our problem. That is an insult.

I773-6 The EPA plan to pipe massive amounts of water to a greatly expanded capacity CTP is incredulous. If zinc is really an issue, there is a lot more â€œbang for the buckâ€ from EPAâ€™s Box fiasco. Every zinc reduction considered needs to be addressed relative to the worst. Delete the small items from any plan. The OU2 channeling and French drains do not address the EPA sources, such as CTP sludge, CIA seeps, and groundwater. Theses sources donâ€™t just disappear.

I773-7 There is no reason to clean up every mining hole in the ground in Shoshone County. Your plan has everything to do with limiting mining options for one of the greatest mining areas in the world.

I773-8 When the NAS addressed adaptive management, it was extremely critical of EPAâ€™s approach to decision making and analysis of plans and results. EPAâ€™s new adaptive management is nothing more than a means to do whatever it wants whenever it wants. No wonder EPA picked a 50 to 90 year time frame.

618771

Response to comment I773-1
Comment noted.

Response to comment I773-2
See response to Comment No. I58-5.

Response to comment I773-3
See response to Comment No. LC37-9. The Selected Remedy includes upgrade and expansion of the CTP. The CTP currently operates under an expired NPDES permit. Upon design of CTP expansion and upgrades, a new NPDES permit will be developed and revised discharge limits will be established that are consistent with current water quality standards and requirements for other dischargers to the SFCDR.

Response to comment I773-4
See response to Comment No. I54-5 regarding remedy protection actions included in the Selected Remedy. See response to Comment LJ36-3 regarding large-scale flooding concerns in the Coeur d'Alene Basin.

Response to comment I773-5
The Selected Remedy includes estimated costs for constructing roads to access sites and to repair damage to existing roads due to cleanup activities. The RODs for OUs 1, 2, and 3 address cleanup of rights-of-way (ROWs) in the Bunker Hill Box and the Coeur d'Alene Basin, as appropriate, to respond to risks to human health. The RODs allow ROWs to be cleaned up such that they provide barriers to underlying metals contamination. Many ROWs have been cleaned up as residential and commercial properties have been remediated in Box and Basin communities. However, EPA and IDEQ recognize that some pre-existing paved roadways may not provide adequate long-term barriers to underlying contaminated material, and that local and state entities are responsible for the long-term road development and maintenance efforts. As a result, the agencies are developing an approach under the existing RODs to address this issue collaboratively with local, county, and state entities responsible for providing and maintaining roadways in their communities. The objective of this effort is to

develop and implement a strategy that ensures the long-term effectiveness of barriers installed in ROWs, and also aligns with the transportation and maintenance needs of the Box and Basin communities.

Response to comment I773-6

The Selected Remedy includes upgrades to the CTP that will allow the plant to operate more efficiently and more reliably and in consistent compliance with discharge requirements. The French drains included in the Selected Remedy in OU 2 are specifically designed to address contaminated groundwater and seeps emanating from the CIA. Further, following receipt of comments on the Proposed Plan and following further evaluation by EPA, the scope of the Selected Remedy has been significantly reduced such that only sites with more significant contamination are included. See response to Comment No. I822-14.

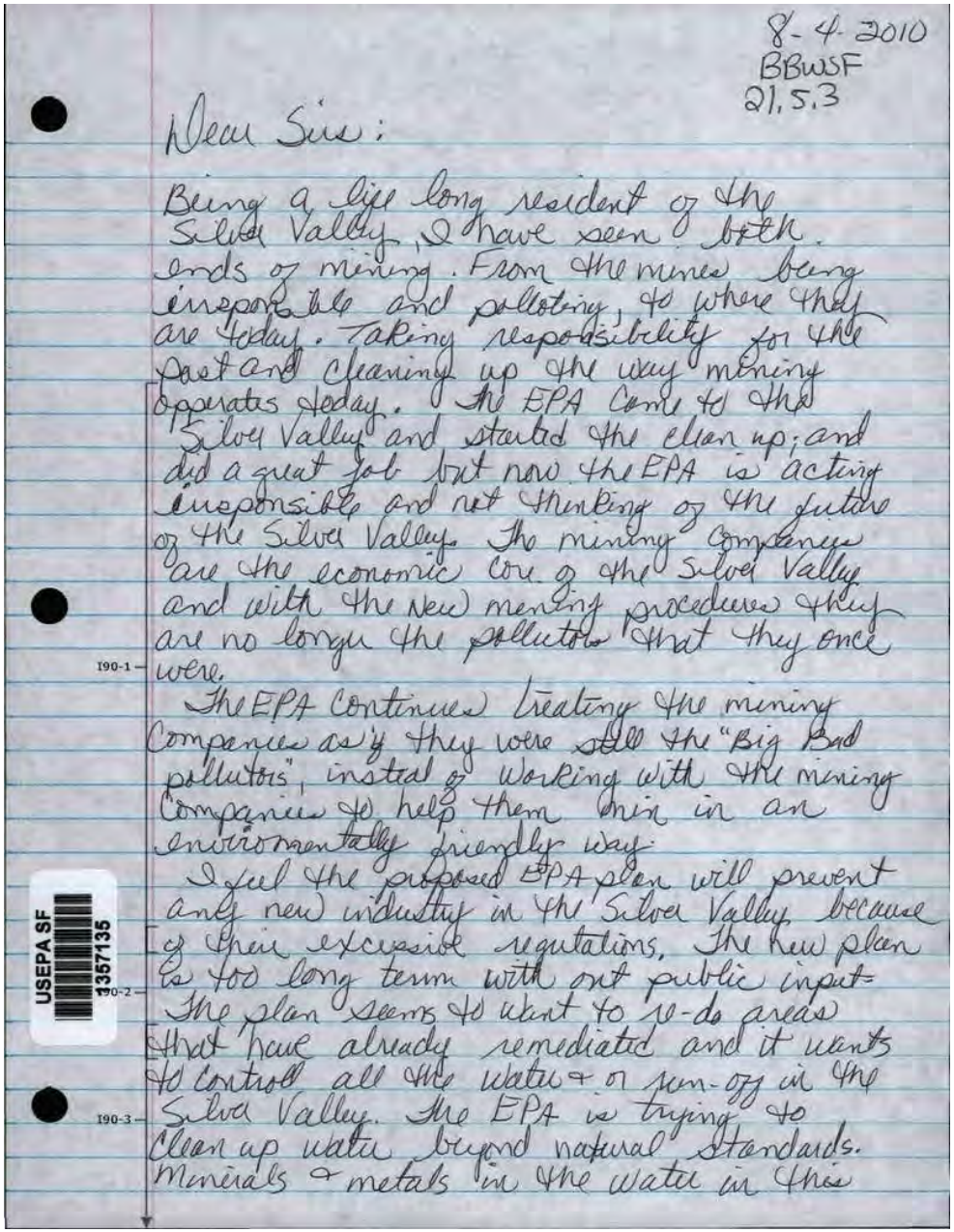
Response to comment I773-7

See responses to Comment Nos. I58-5 and I822-14.

Response to comment I773-8

See response to Comment No. I58-1 regarding the duration of the Selected Remedy. See response to Comment No. LJ11-2 regarding public input and EPA's adaptive management approach.

Trumbull, Roger, I90, Letter 1357135



8-4-2010
BBWSF
21,5,3

Dear Sirs:

Being a life long resident of the Silver Valley, I have seen both ends of mining. From the mines being irresponsible and polluting, to where they are today. Taking responsibility for the past and cleaning up the way mining operates today. The EPA came to the Silver Valley and started the clean up; and did a great job but now the EPA is acting irresponsible and not thinking of the future of the Silver Valley. The mining companies are the economic core of the Silver Valley and with the new mining procedures they are no longer the polluters that they once were. I90-1

The EPA continues treating the mining companies as if they were still the "Big Bad polluters", instead of working with the mining companies to help them mix in an environmentally friendly way.

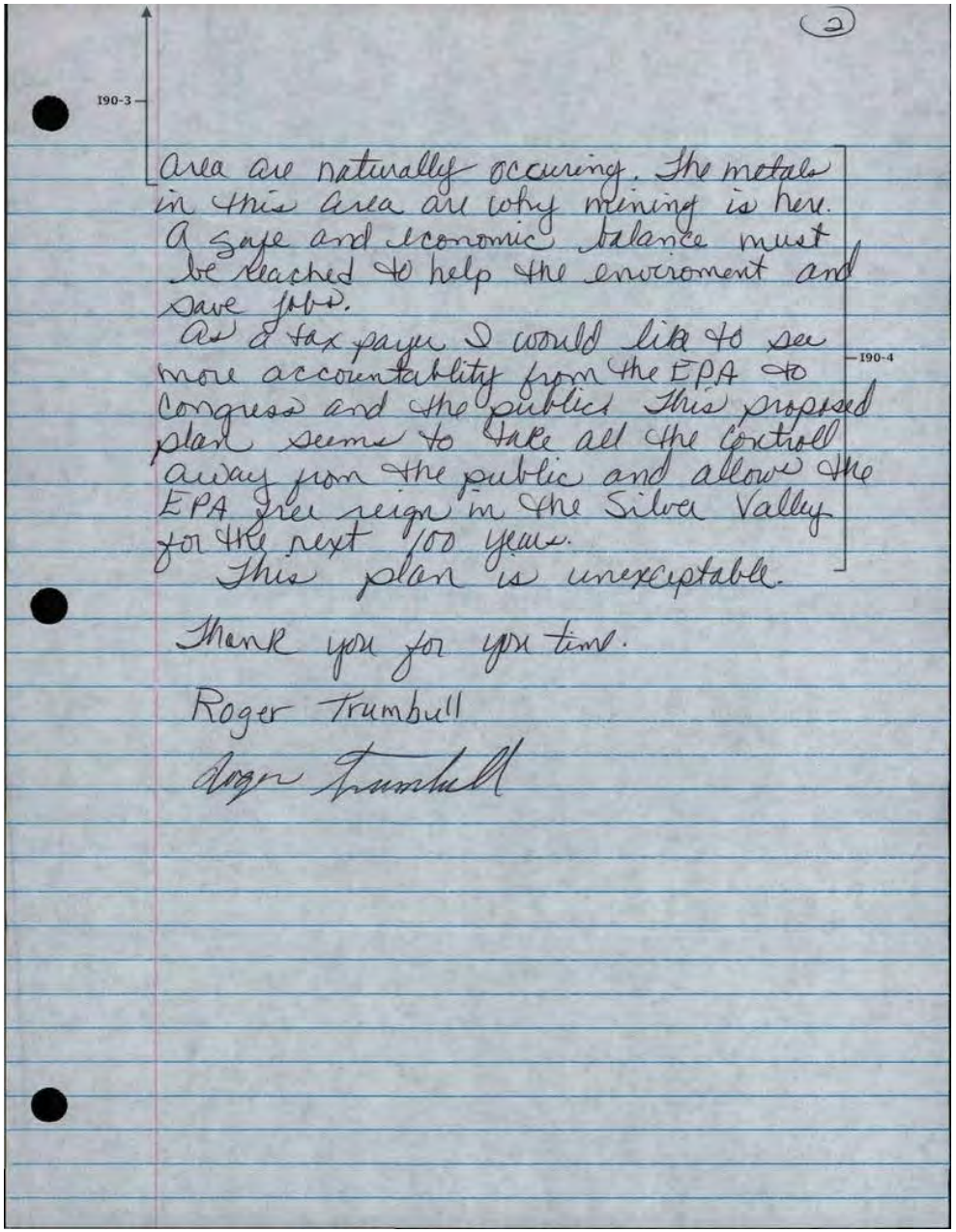
I feel the proposed EPA plan will prevent any new industry in the Silver Valley, because of their excessive regulations. The new plan is too long term with out public input. The plan seems to want to re-do areas that have already remediated and it wants to control all the water & or rain-off in the Silver Valley. The EPA is trying to clean up water beyond natural standards. Minerals & metals in the water in this I90-2 I90-3

USEPA SF 1357135

Response to comment I90-1
See responses to Comment Nos. I58-5 and I54-2.

Response to comment I90-2
See response to Comment No. I58-1.

Response to comment I90-3
See response to Comment No. LC33-8.



(2)

I90-3

area are naturally occuring. The metals in this area are why mining is here. A safe and economic balance must be reached to help the enviroment and save jobs.

As a tax payer I would like to see more accountability from the EPA to Congress and the public. This proposed plan seems to take all the control away from the public and allow the EPA free reign in the Silver Valley for the next 100 years.

I90-4

This plan is unexceptable.

Thank you for your time.

Roger Trumbull

Roger Trumbull

Response to comment I90-4

See response to Comment No. I474-1. EPA remains committed to meaningful public engagement throughout the Superfund process in the Coeur d'Alene Basin.

Turner, Jeanette, I774, Letter 618773

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
fandjturner@hotmail.com to: formsubmission 11/18/2010 07:31 PM
Sent by: Fandjturner@Hotmail.Com <fandjturner=hotmail.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Jeanette Turner
Date: 10/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons. It is my belief this is not the plan to be inplemented for many reasons including time, cost, ecomomics, water stream and river impact.

Please reconsider this plan.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health — Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories — The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences — This plan is based on a flawed model and ignores many NAS recommendations Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: fandjturner@hotmail.com
Mailing Address: 51400 Highway 3|Clarkia|Idaho|83812|US
Phone Number: (208) 245-3800

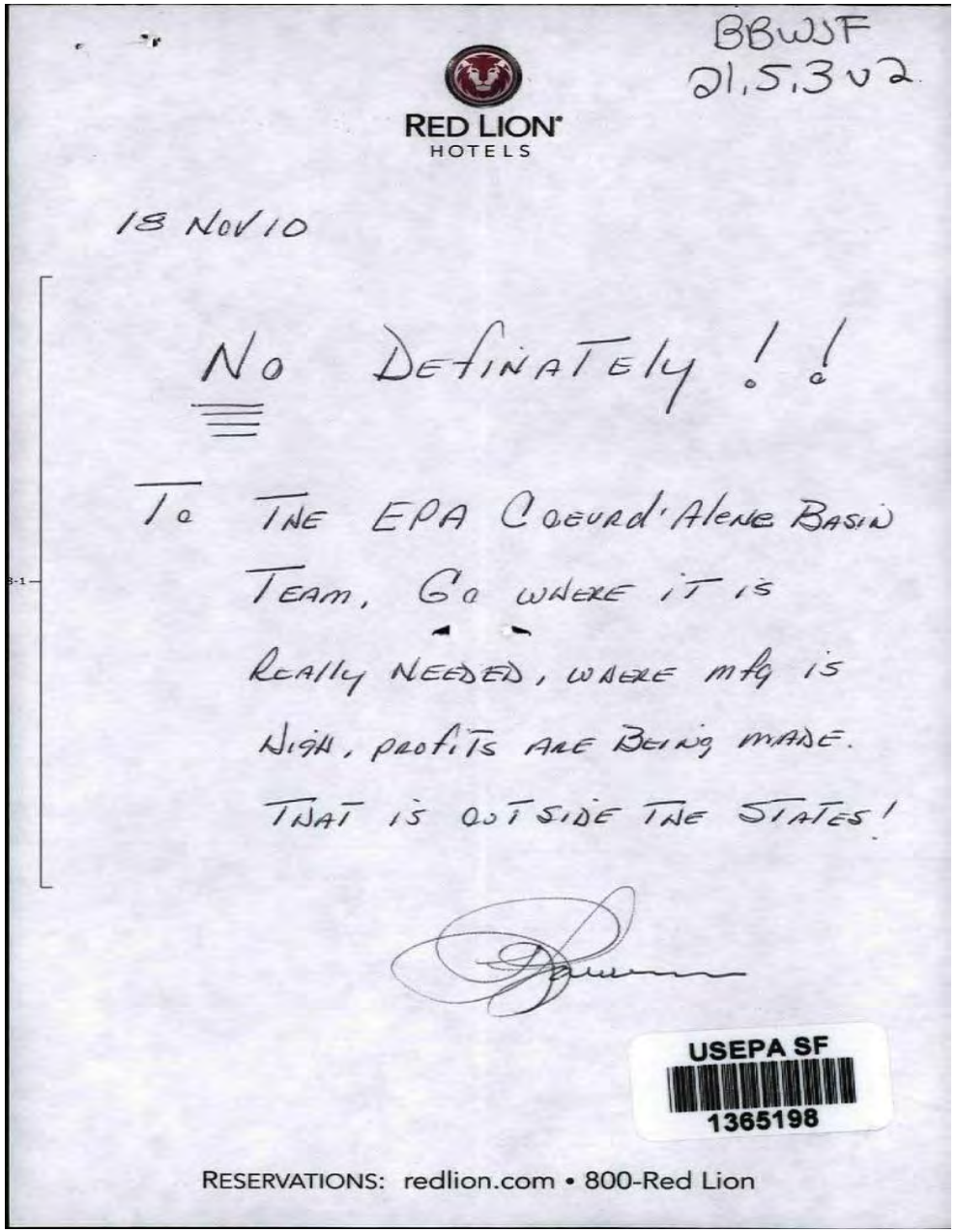
I774-1

618773

Response to comment I774-1

See response to Comment No. I351-1.

Unknown, Unknown, I808, Letter 1365198



BBWSF
21.5.3 v2

RED LION®
HOTELS

18 Nov 10

No Definately!!

To the EPA Coeur d'Alene Basin
Team, Go where it is
Really needed, where mfg is
high, profits are being made.
That is outside the States!

I808-1

USEPA SF
1365198

RESERVATIONS: redlion.com • 800-Red Lion

Response to comment I808-1
Comment noted.

Unknown, Unknown, I861, Letter 1365262

BBWSF
RECEIVED 21,5,3v2
NOV 22 2010
Environmental Cleanup Office

Shoshone County

Editorial

Marlie Higbee Cataldo, Ida

By Dick Harwood, Idaho State Representative

Disingenuous. That's the only word to adequately describe the Environmental Protection Agency's (EPA) recent media-heavy attempts to paint themselves and their $1.3 billion, 50-90 year plan to expand clean-up in the Upper Coeur d'Alene Basin, in a favorable light to the people of North Idaho.

EPA released a Record of Decision (ROD) in 2002 to remediate historic mine waste in the Silver Valley. This ROD was a 30-year plan intended to address human health protection in Shoshone County. Despite the fact that blood-lead levels are now within acceptable limits, the EPA is proposing to expand cleanup efforts to address ecological issues already underway in the Valley.

Silver Valley residents are hopping mad, and rightfully so. Consider some of the elements of the proposed plan — 10 miles of plastic liner installed under the South Fork of the Coeur d'Alene River, removal of 12,000 to 19,000 gallons of groundwater per minute from the upper headwaters of the South Fork, construction of 59 miles of pipeline to move collected groundwater to the Central Treatment Plant, five to six new repositories each the size of East Mission Flats and enough soil to fill a 115-story building, and no assurances that the mining activities, which provide over 11 percent of Shoshone County's direct employment, will be allowed to continue.

Needless to say, public opposition to this plan is virtually unanimous. Hundreds of people showed up at public meetings in the valley last August to tell the EPA their plan is too expensive, too big and the wrong approach. Simply put, EPA has overstated the problem and the resultant cleanup plan.

EPA is undeterred, however. They have launched a media blitz which includes recurrent half-page ads in the local newspapers and media tours showcasing projects they claim their cleanup activities have had a positive impact on wildlife habitat.

There's just one problem — EPA isn't telling the whole truth. Recent stories have appeared in the local newspapers showcasing Moon Creek, a contaminated stream north of Kellogg, as an example of successful cleanup. These stories implied that the Moon Creek project was an EPA-directed cleanup. In reality, the U.S. Forest Service was responsible for that effort, not the EPA.

In another article, the EPA trumpets about a wetland improvement project near Rose Lake. This is an admirable project, but the problem is EPA suggests that this is an example of what they can accomplish in the Upper Basin. In reality, this Lower Basin project is completely different from what is being proposed for the Upper Basin. This project was a conservation easement on private property, with many agencies and volunteers involved. An EPA spokesman implied in the story that the formula they used on the project is easily exported to the Upper Basin. In reality, comparing this small project to the massive Upper Basin plan is comparing apples and oranges.

Perhaps most maddening however, are the series of ads EPA has placed in our local newspapers which attempt to help us all "understand the plan." These are nothing but desperate attempts by the agency to try and gain some level of support for a wildly unpopular and misguided plan.

We must stop this EPA – 30 Yr plan. People cannot sell homes – start new business – No loans in area – stop this mess – Please help

I861

USEPA SF
1365262

Response to comment I861-1

See response to Comment No. I54-2.

Unknown, Unknown, I862, Letter 1365264

Upper Basin EPA
1200 6th Ave
Suite 900
Seattle WA 98101
BBWSF
21.5.3.v2

RECEIVED
NOV 29 2010
Environmental Cleanup

Shoshone County

Editorial

By Dick Harwood, Idaho State Representative

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Perhaps most maddening however, are the series of ads EPA has placed in our local newspapers which attempt to help us all "understand the plan." These are nothing but desperate attempts by the agency to try and gain some level of support for a wildly unpopular and misguided plan.

Stop this mess.
30 yo ♀ - Stupid
Maine Wilderness
No jobs in area

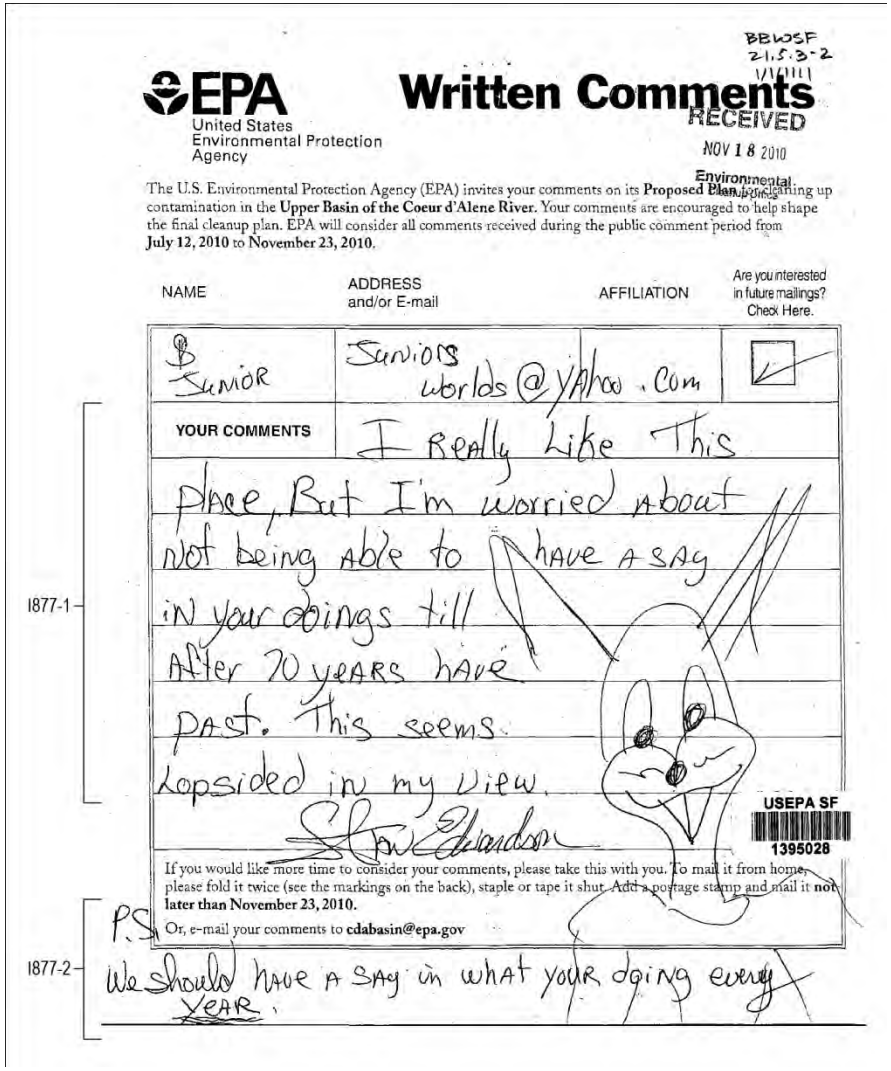
I862-1

USEPA SF
1365264

Response to comment I862-1

See responses to Comment Nos. I58-1 and I474-1.

Unknown, Unknown, I877, Letter 1395028



BBWSF
21.5.3-2

EPA United States Environmental Protection Agency

Written Comments

RECEIVED
NOV 18 2010
Environmental Cleanup Office

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River**. Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **November 23, 2010**.

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.
S Junior	Juniors worlds@yahoo.com		☑

YOUR COMMENTS

I Really Like This place, But I'm worried about not being able to have A SAY in your doings till After 70 yeARS hAve past. This seems Lopsided in my View.

S Junior Chandler

USEPA SF
1395028

If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than November 23, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

I877-1

P.S. We should have A SAY in what your doing every YEAR.

I877-2

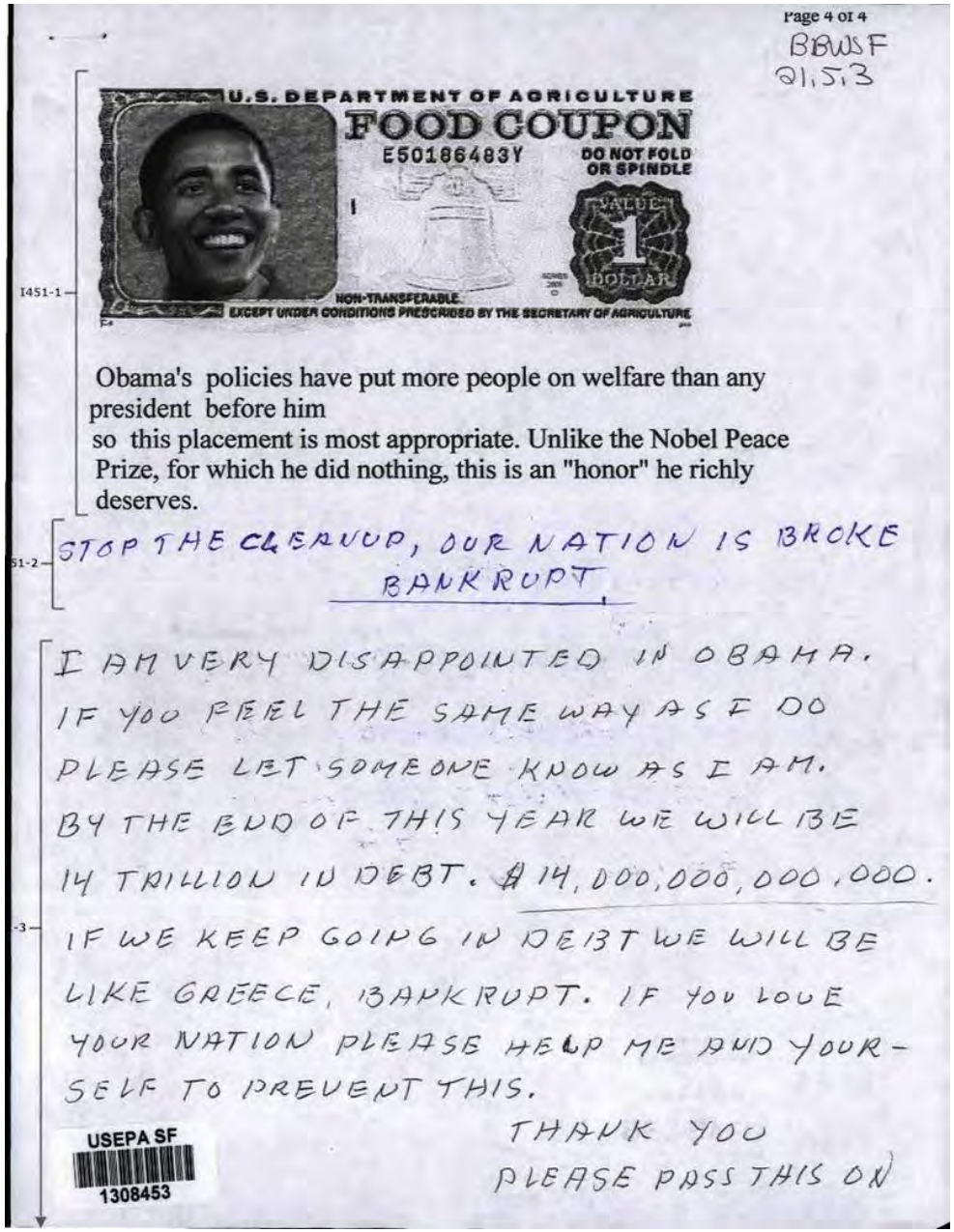
Response to comment I877-1

See responses to Comment Nos. I58-1, LJ11-2, and I295-2.

Response to comment I877-2

See response to Comment No. I295-2.

Unknown, Unknown, I451, Letter 1308453



Page 4 of 4

BBWSF
21,513

U.S. DEPARTMENT OF AGRICULTURE
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E50186483Y
DO NOT FOLD OR SPINDLE
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NON-TRANSFERABLE
EXCEPT UNDER CONDITIONS PRESCRIBED BY THE SECRETARY OF AGRICULTURE

I451-1

Obama's policies have put more people on welfare than any president before him
so this placement is most appropriate. Unlike the Nobel Peace Prize, for which he did nothing, this is an "honor" he richly deserves.

I451-2

STOP THE CLEANUP, OUR NATION IS BROKE BANKRUPT

I AM VERY DISAPPOINTED IN OBAMA.
IF YOU FEEL THE SAME WAY AS I DO
PLEASE LET SOMEONE KNOW AS I AM.
BY THE END OF THIS YEAR WE WILL BE
14 TRILLION IN DEBT. $14,000,000,000,000.

I451-3

IF WE KEEP GOING IN DEBT WE WILL BE
LIKE GREECE, BANKRUPT. IF YOU LOVE
YOUR NATION PLEASE HELP ME AND YOUR-
SELF TO PREVENT THIS.
THANK YOU
PLEASE PASS THIS ON

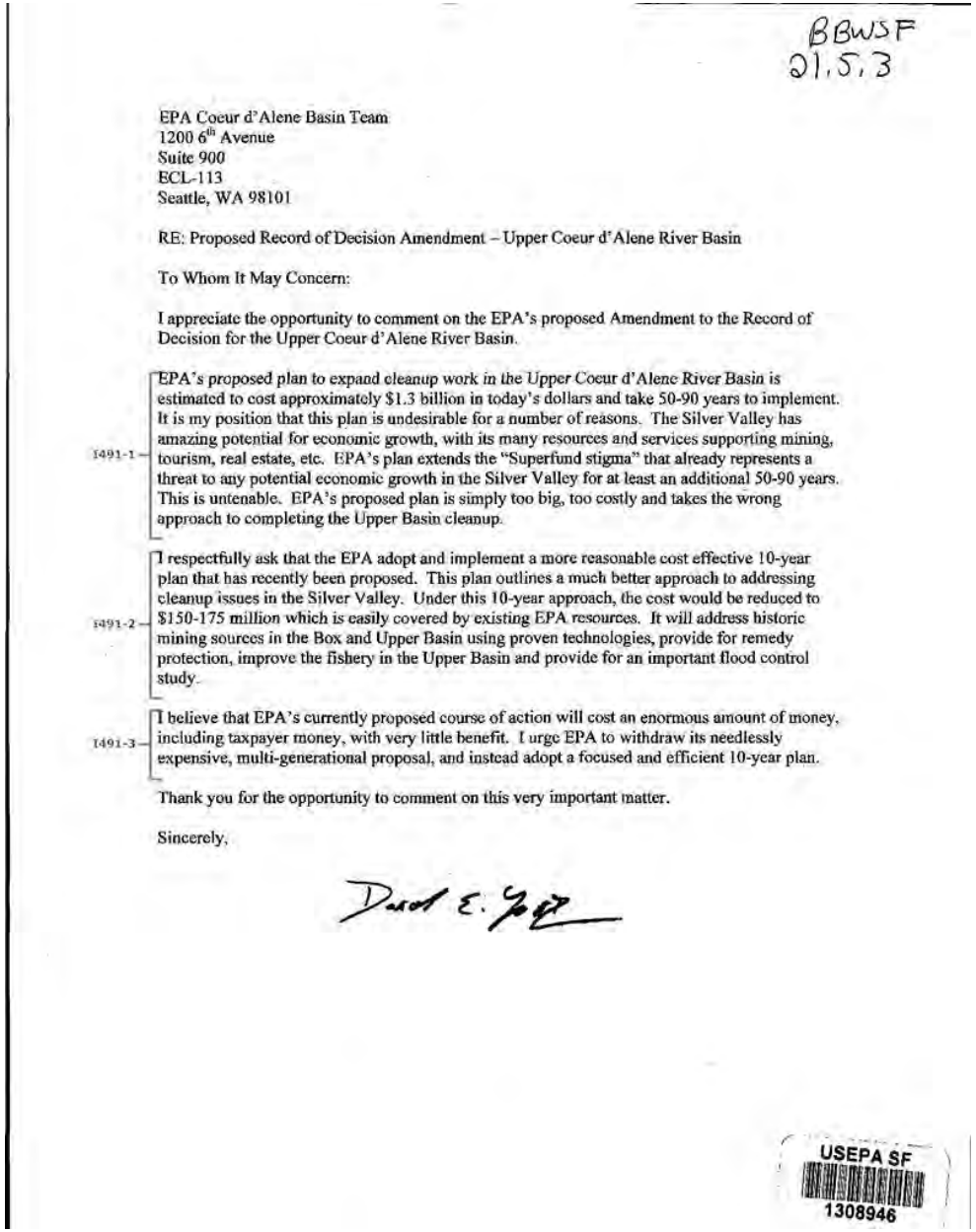
USEPA SF
1308453

Response to comment I451-1
Comment noted.

Response to comment I451-2
Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. With regard to funding see response to Comment No. I295-3.

Response to comment I451-3
Comment noted.

Unknown, Unknown, I491, Letter 1308946



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I491-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I491-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I491-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

David E. Yost

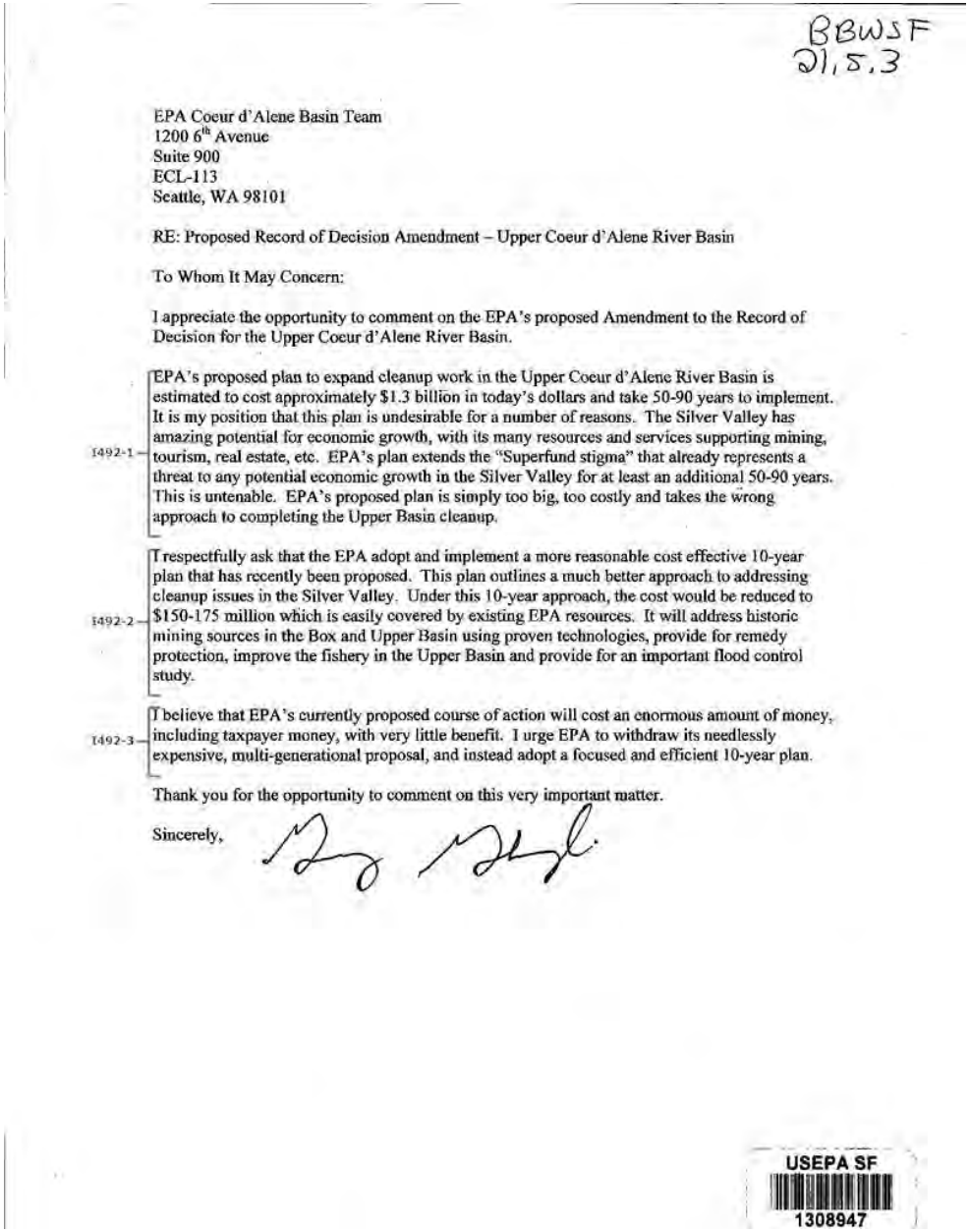
USEPA SF
1308946

Response to comment I491-1
See response to Comment No. I474-1.

Response to comment I491-2
See response to Comment No. I474-2.

Response to comment I491-3
See response to Comment No. I474-3.

Unknown, Unknown, I492, Letter 1308947



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I492-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I492-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

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Thank you for the opportunity to comment on this very important matter.

Sincerely,

USEPA SF
1308947

Response to comment I492-1

See response to Comment No. I474-1.

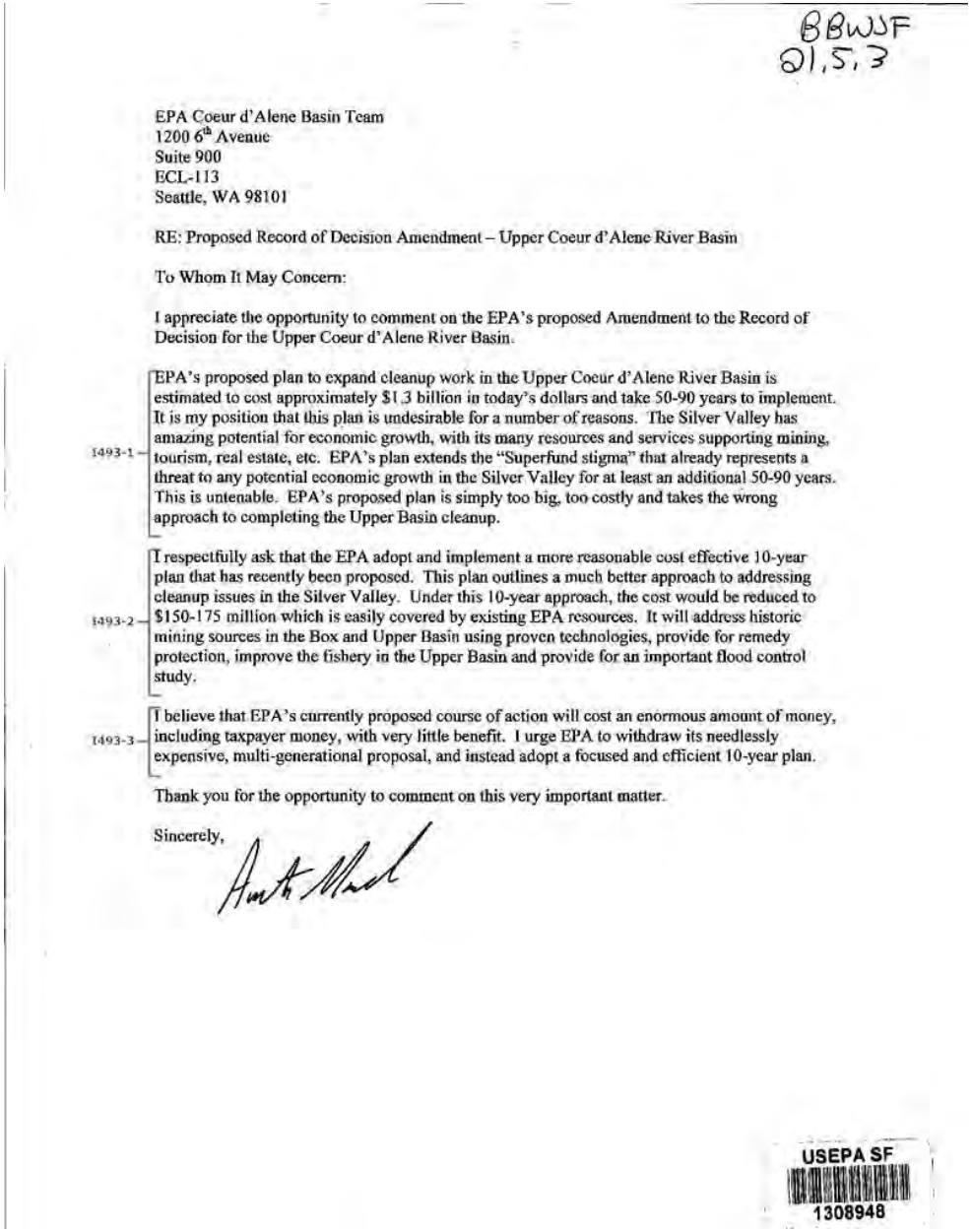
Response to comment I492-2

See response to Comment No. I474-2.

Response to comment I492-3

See response to Comment No. I474-3.

Unknown, Unknown, I493, Letter 1308948



BBWJF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

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I493-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I493-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

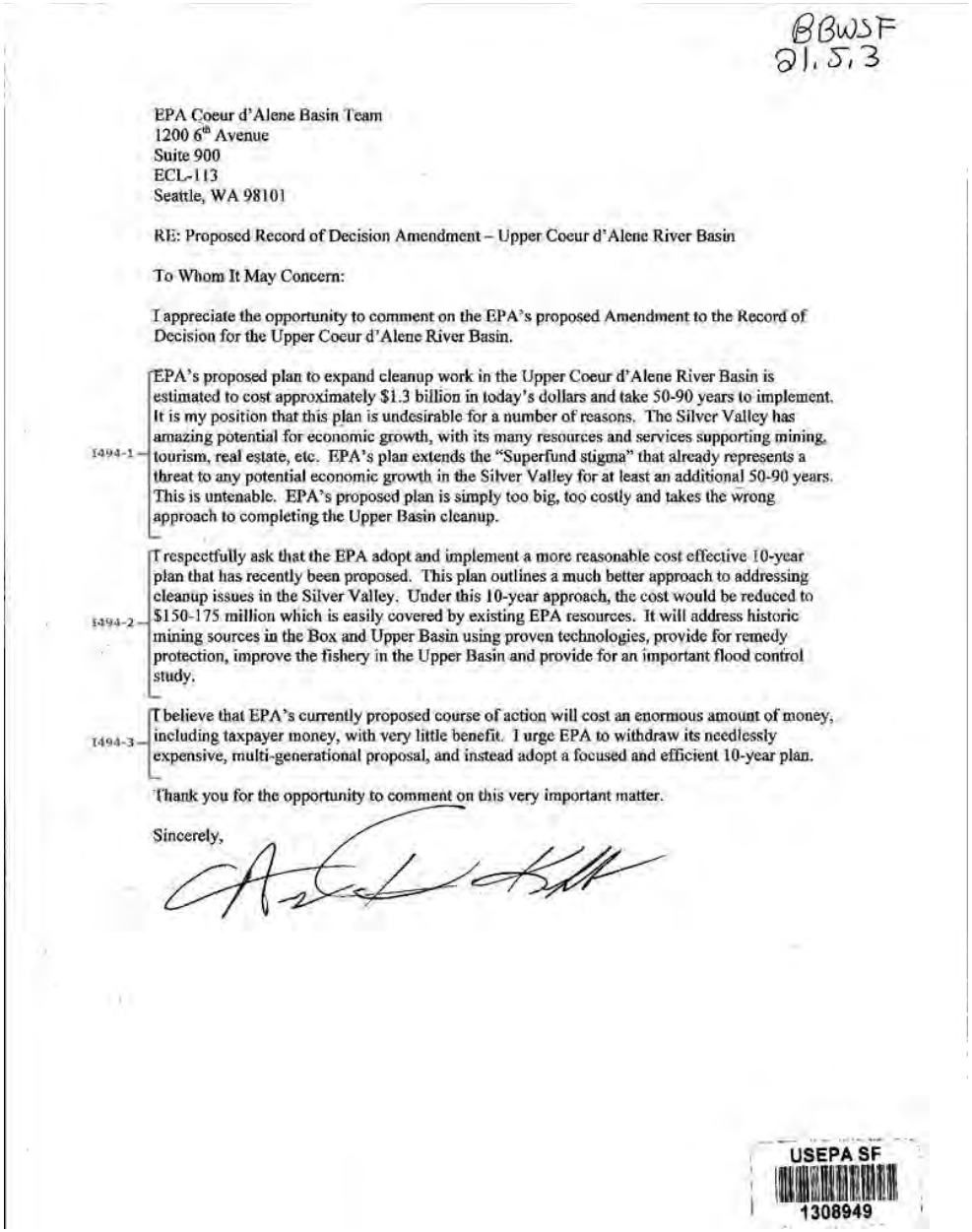
USEPA SF
1308948

Response to comment I493-1
See response to Comment No. I474-1.

Response to comment I493-2
See response to Comment No. I474-2.

Response to comment I493-3
See response to Comment No. I474-3.

Unknown, Unknown, I494, Letter 1308949



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I494-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I494-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I494-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

USEPA SF
1308949

Response to comment I494-1

See response to Comment No. I474-1.

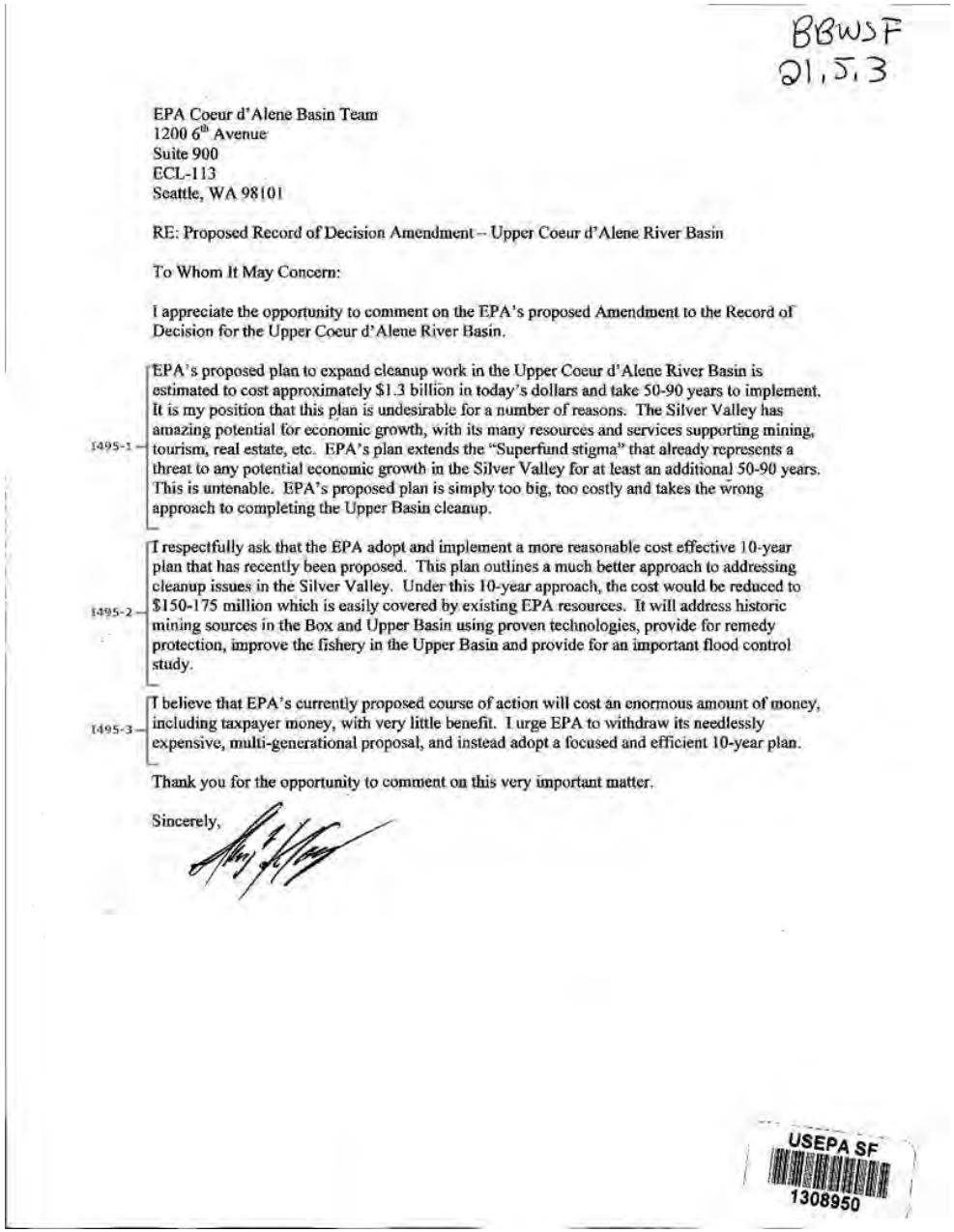
Response to comment I494-2

See response to Comment No. I474-2.

Response to comment I494-3

See response to Comment No. I474-3.

Unknown, Unknown, I495, Letter 1308950



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I495-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I495-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I495-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

USEPA SF
1308950

Response to comment I495-1
See response to Comment No. I474-1.

Response to comment I495-2
See response to Comment No. I474-2.

Response to comment I495-3
See response to Comment No. I474-3.

Unknown, Unknown, I496, Letter 1308951

BBWSF
21, 5, 3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I496-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I496-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I496-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

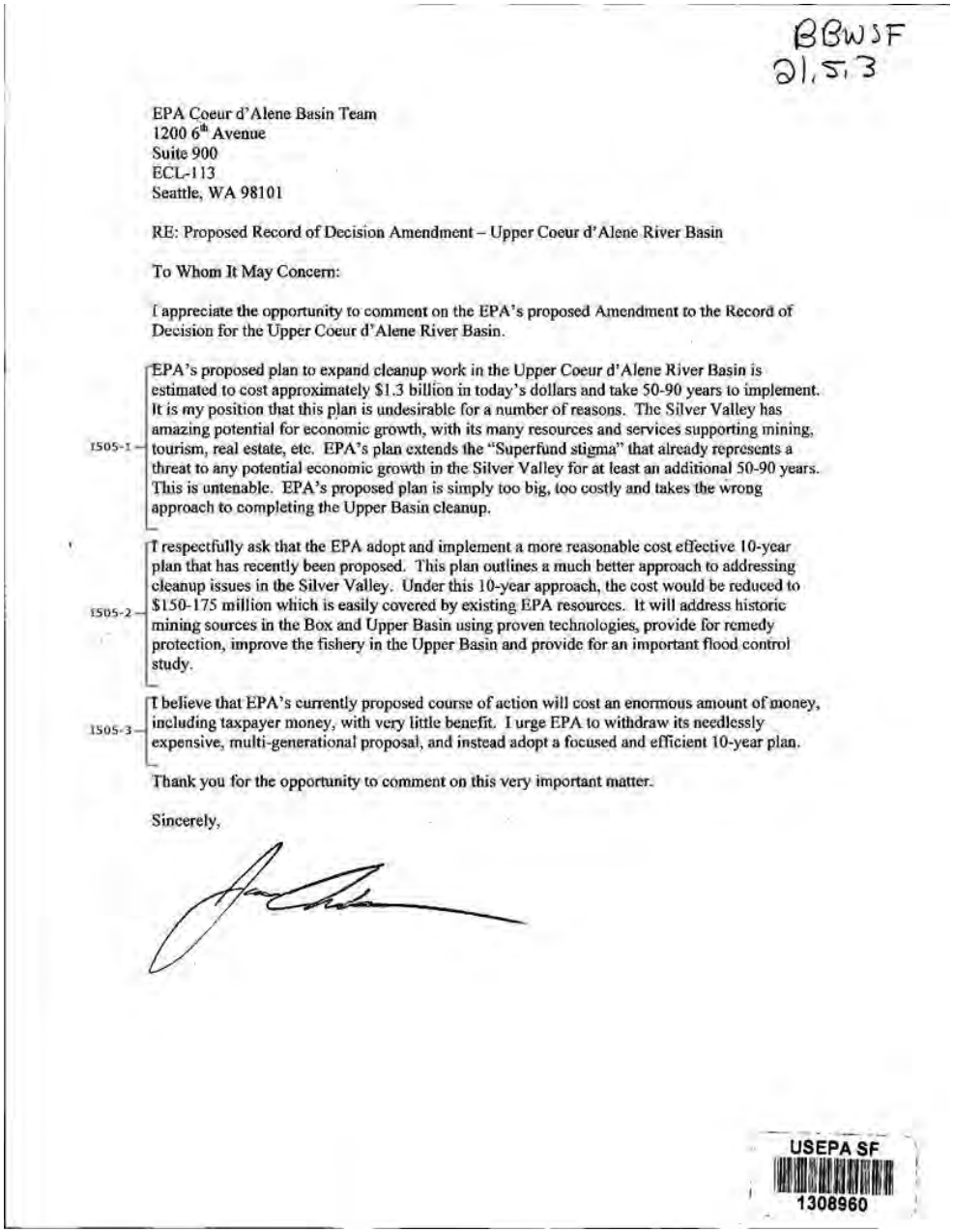
Kalla Hart

Response to comment I496-1
See response to Comment No. I474-1.

Response to comment I496-2
See response to Comment No. I474-2.

Response to comment I496-3
See response to Comment No. I474-3.

Unknown, Unknown, I505, Letter 1308960



BBWSF
21,513

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I505-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I505-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I505-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

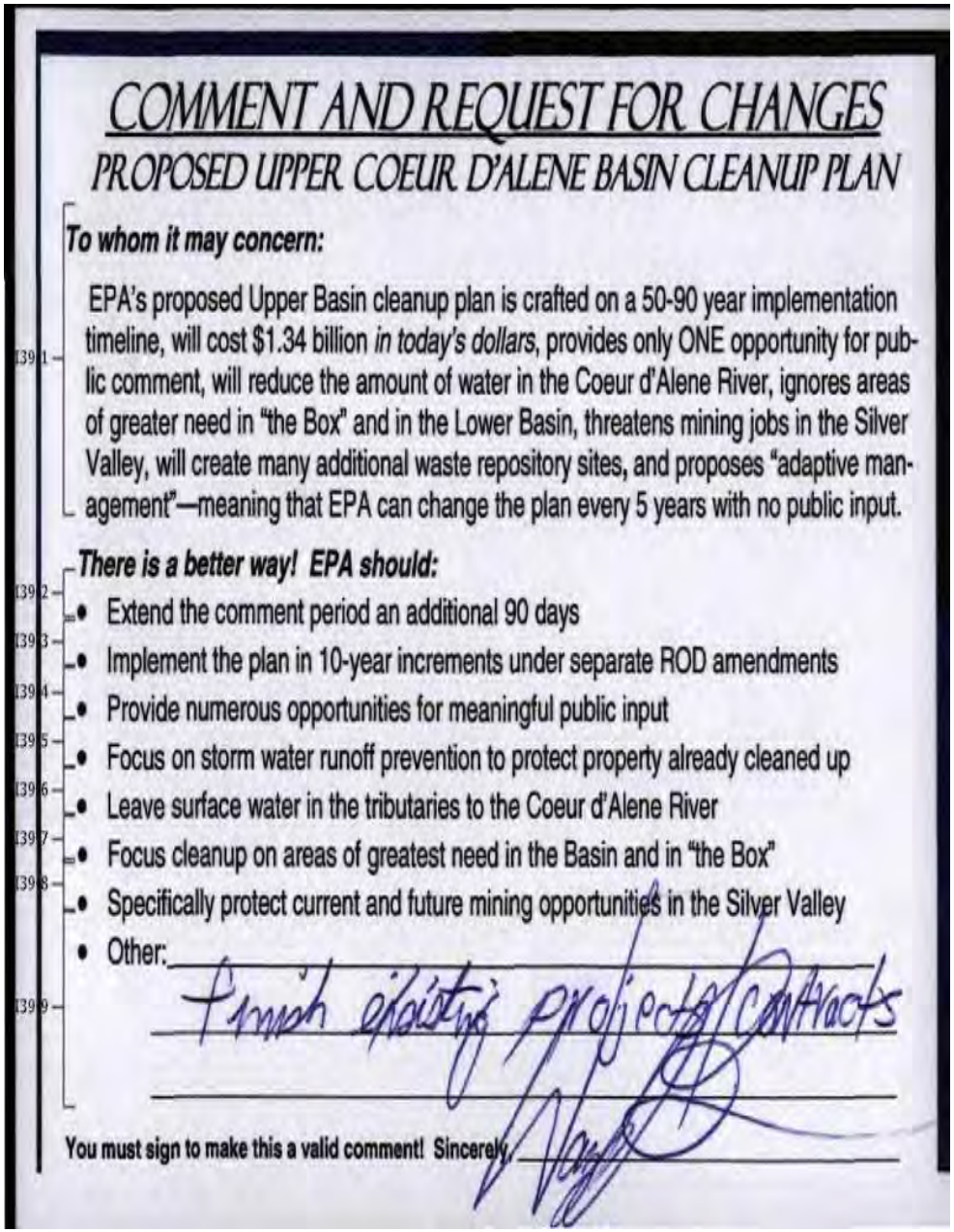
USEPA SF
1308960

Response to comment I505-1
See response to Comment No. I474-1.

Response to comment I505-2
See response to Comment No. I474-2.

Response to comment I505-3
See response to Comment No. I474-3.

Unknown, Unknown, I39, Letter 1357083



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I39-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I39-2 Extend the comment period an additional 90 days
- I39-3 Implement the plan in 10-year increments under separate ROD amendments
- I39-4 Provide numerous opportunities for meaningful public input
- I39-5 Focus on storm water runoff prevention to protect property already cleaned up
- I39-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I39-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I39-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: finish existing project contracts

I39-9 **You must sign to make this a valid comment!** Sincerely,

Response to comment I39-1
See response to Comment No. I25-1.

Response to comment I39-2
See response to Comment No. I25-2.

Response to comment I39-3
See response to Comment No. I25-3.

Response to comment I39-4
See response to Comment No. I25-4.

Response to comment I39-5
See response to Comment No. I25-5.

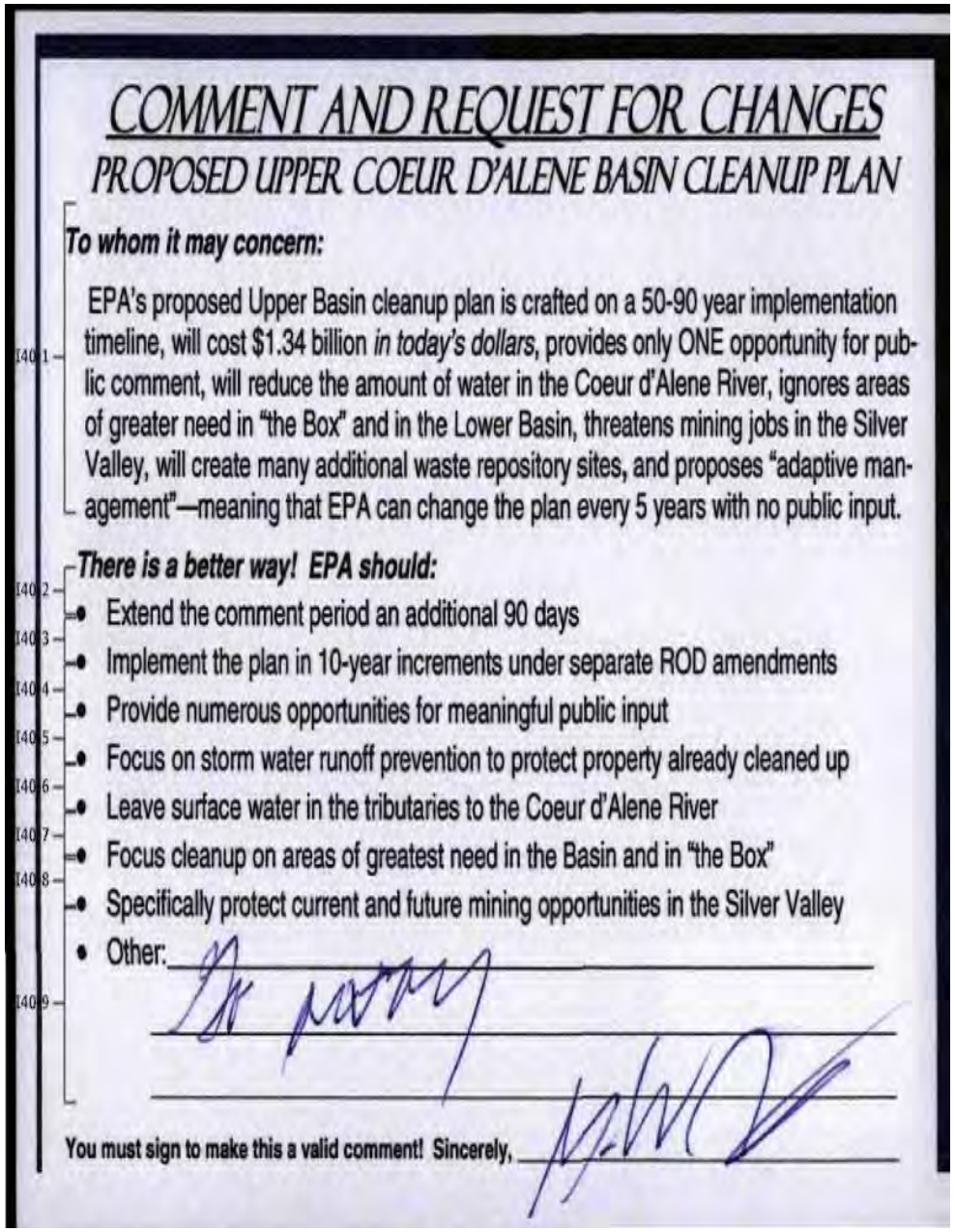
Response to comment I39-6
See response to Comment No. I25-6.

Response to comment I39-7
See response to Comment No. I25-7.

Response to comment I39-8
See response to Comment No. I25-8.

Response to comment I39-9
Comment noted.

Unknown, Unknown, I40, Letter 1357084



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I40-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I40-2 Extend the comment period an additional 90 days
- I40-3 Implement the plan in 10-year increments under separate ROD amendments
- I40-4 Provide numerous opportunities for meaningful public input
- I40-5 Focus on storm water runoff prevention to protect property already cleaned up
- I40-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I40-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I40-8 Specifically protect current and future mining opportunities in the Silver Valley
- I40-9 Other: [signature]

You must sign to make this a valid comment! Sincerely, [signature]

Response to comment I40-1
See response to Comment No. I25-1.

Response to comment I40-2
See response to Comment No. I25-2.

Response to comment I40-3
See response to Comment No. I25-3.

Response to comment I40-4
See response to Comment No. I25-4.

Response to comment I40-5
See response to Comment No. I25-5.

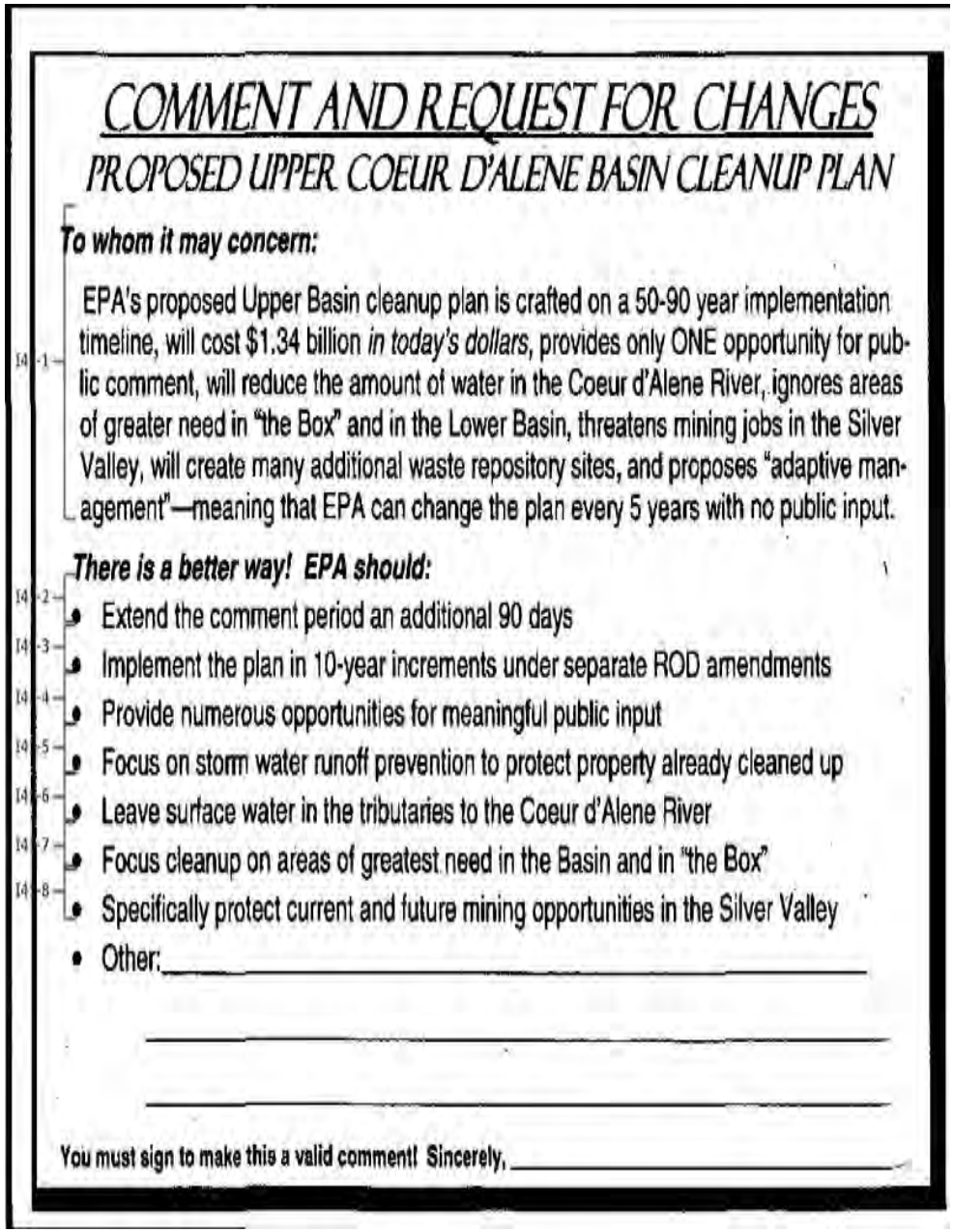
Response to comment I40-6
See response to Comment No. I25-6.

Response to comment I40-7
See response to Comment No. I25-7.

Response to comment I40-8
See response to Comment No. I25-8.

Response to comment I40-9
Comment noted.

Unknown, Unknown, I41, Letter 1357085



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I41-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I41-2 Extend the comment period an additional 90 days
- I41-3 Implement the plan in 10-year increments under separate ROD amendments
- I41-4 Provide numerous opportunities for meaningful public input
- I41-5 Focus on storm water runoff prevention to protect property already cleaned up
- I41-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I41-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I41-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I41-1
See response to Comment No. I25-1.

Response to comment I41-2
See response to Comment No. I25-2.

Response to comment I41-3
See response to Comment No. I25-3.

Response to comment I41-4
See response to Comment No. I25-4.

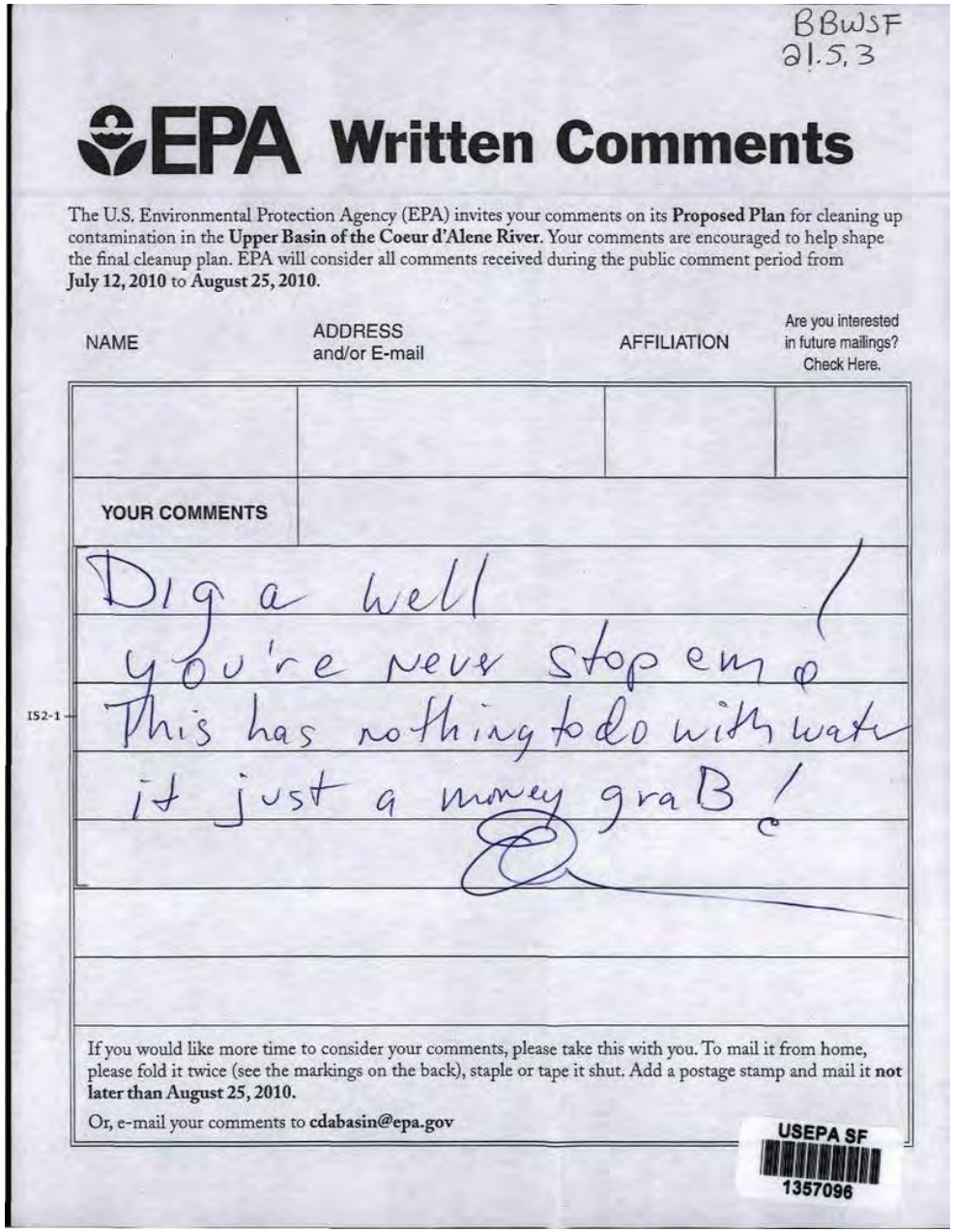
Response to comment I41-5
See response to Comment No. I25-5.

Response to comment I41-6
See response to Comment No. I25-6.

Response to comment I41-7
See response to Comment No. I25-7.

Response to comment I41-8
See response to Comment No. I25-8.

Unknown, Unknown, I52, Letter 1357096



BBWSF
21.5.3

EPA Written Comments

The U.S. Environmental Protection Agency (EPA) invites your comments on its **Proposed Plan** for cleaning up contamination in the **Upper Basin of the Coeur d'Alene River.** Your comments are encouraged to help shape the final cleanup plan. EPA will consider all comments received during the public comment period from **July 12, 2010** to **August 25, 2010.**

NAME	ADDRESS and/or E-mail	AFFILIATION	Are you interested in future mailings? Check Here.

YOUR COMMENTS

Dig a well
you're never stop em
I52-1 This has nothing to do with wate
it just a money graB!

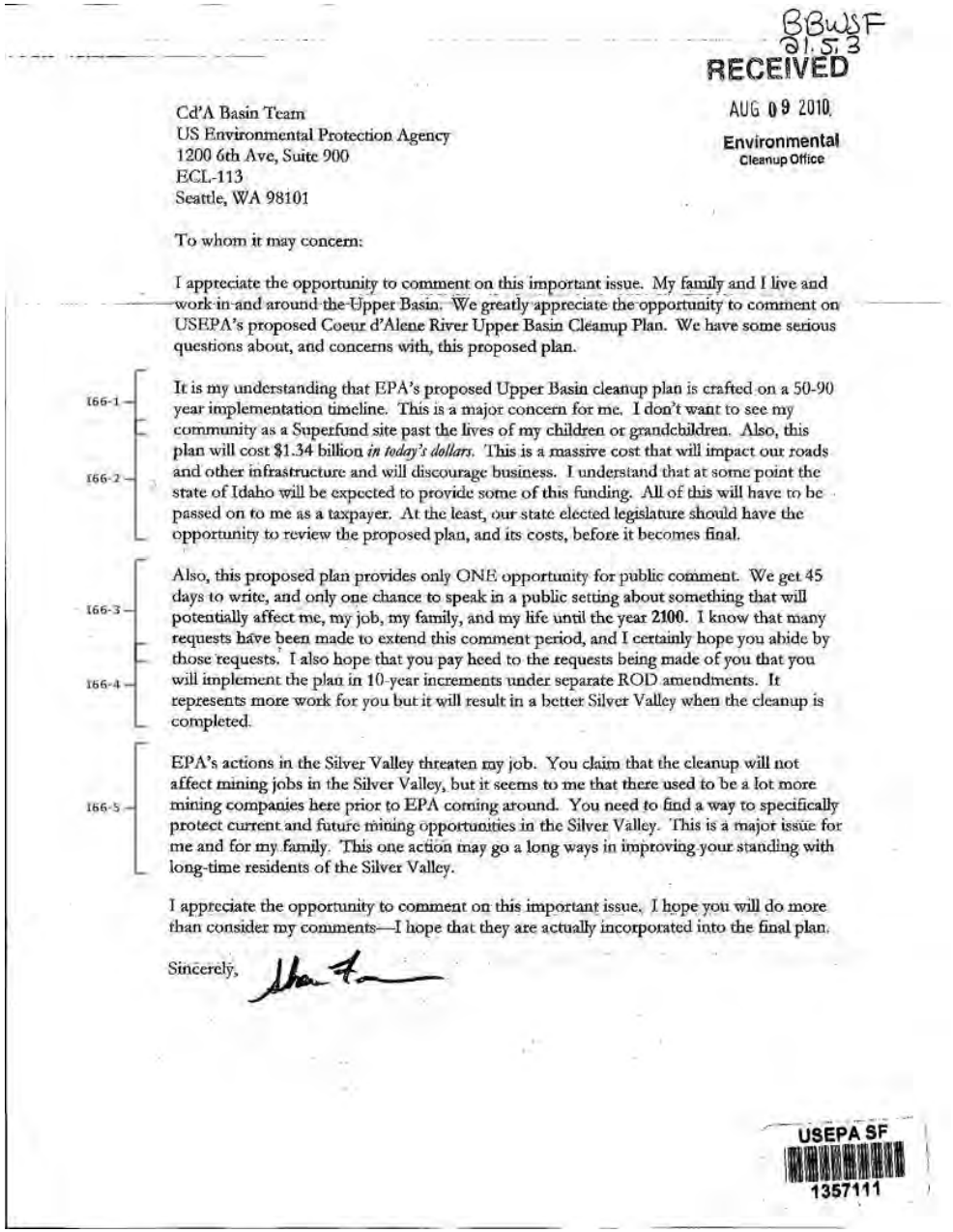
If you would like more time to consider your comments, please take this with you. To mail it from home, please fold it twice (see the markings on the back), staple or tape it shut. Add a postage stamp and mail it **not later than August 25, 2010.**

Or, e-mail your comments to **cdabasin@epa.gov**

USEPA SF
1357096

Response to comment I52-1
Comment noted.

Unknown, Unknown, I66, Letter 1357111



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I66-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I66-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I66-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I66-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I66-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

USEPA SF
1357111

Response to comment I66-1
See response to Comment No. I58-1.

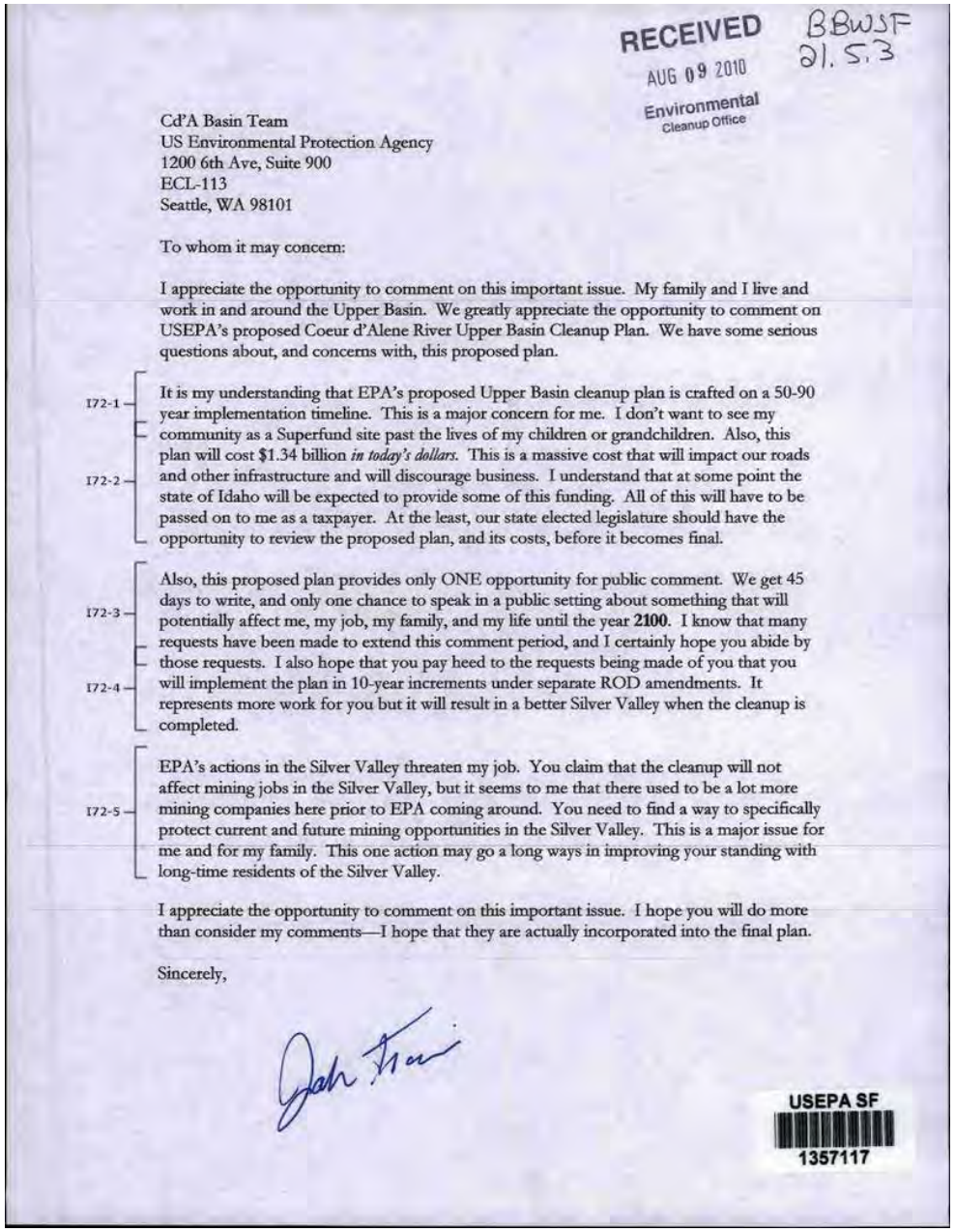
Response to comment I66-2
See response to Comment No. I58-2.

Response to comment I66-3
See response to Comment No. I58-3.

Response to comment I66-4
See response to Comment No. I58-4.

Response to comment I66-5
See response to Comment No. I58-5.

Unknown, Unknown, I72, Letter 1357117



RECEIVED
AUG 09 2010
Environmental
Cleanup Office

BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I72-1, I72-2 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I72-3, I72-4 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I72-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

USEPA SF
1357117

Response to comment I72-1
See response to Comment No. I58-1.

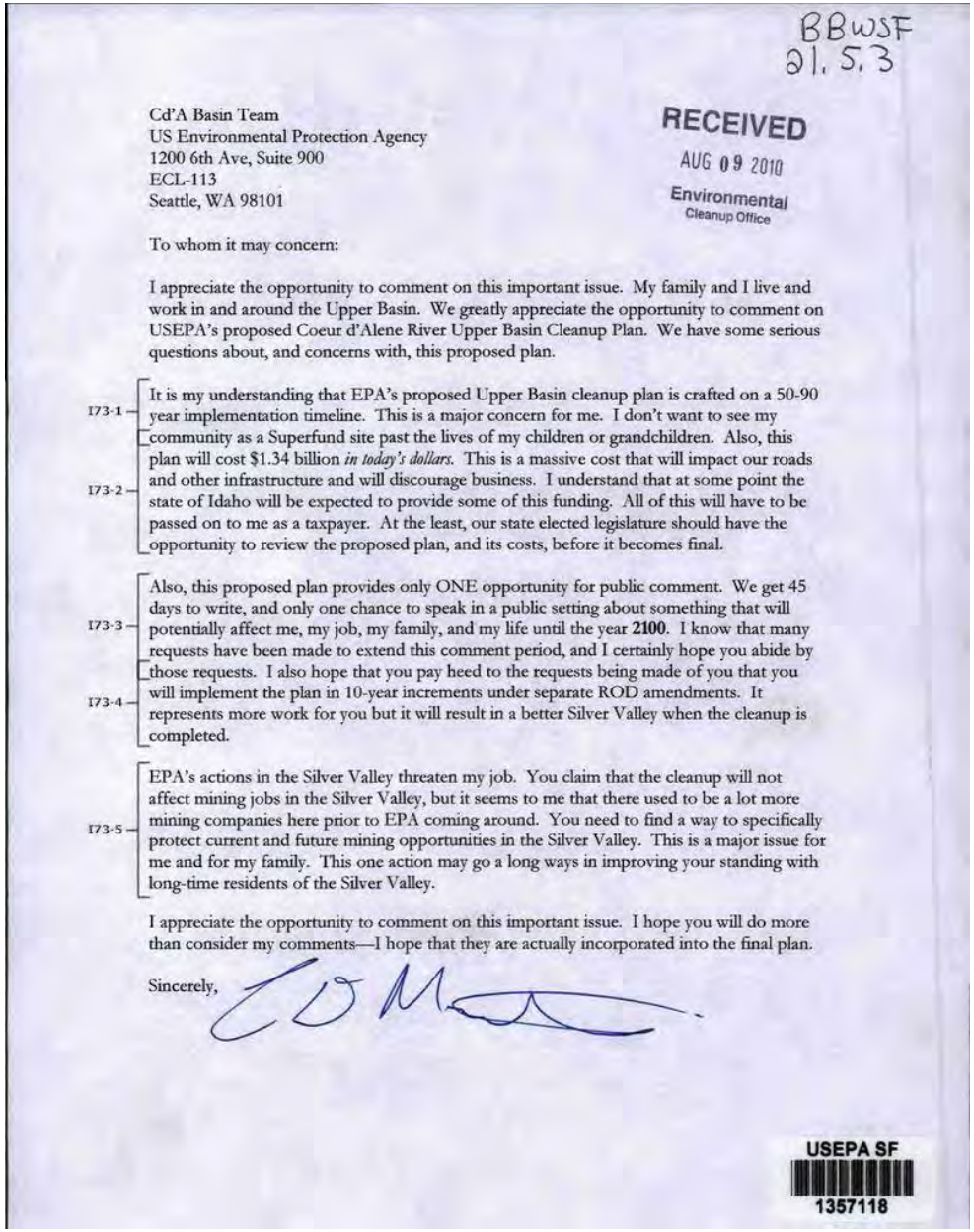
Response to comment I72-2
See response to Comment No. I58-2.

Response to comment I72-3
See response to Comment No. I58-3.

Response to comment I72-4
See response to Comment No. I58-4.

Response to comment I72-5
See response to Comment No. I58-5.

Unknown, Unknown, I73, Letter 1357118



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I73-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I73-2

I73-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I73-4

I73-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

USEPA SF
1357118

Response to comment I73-1
See response to Comment No. I58-1.

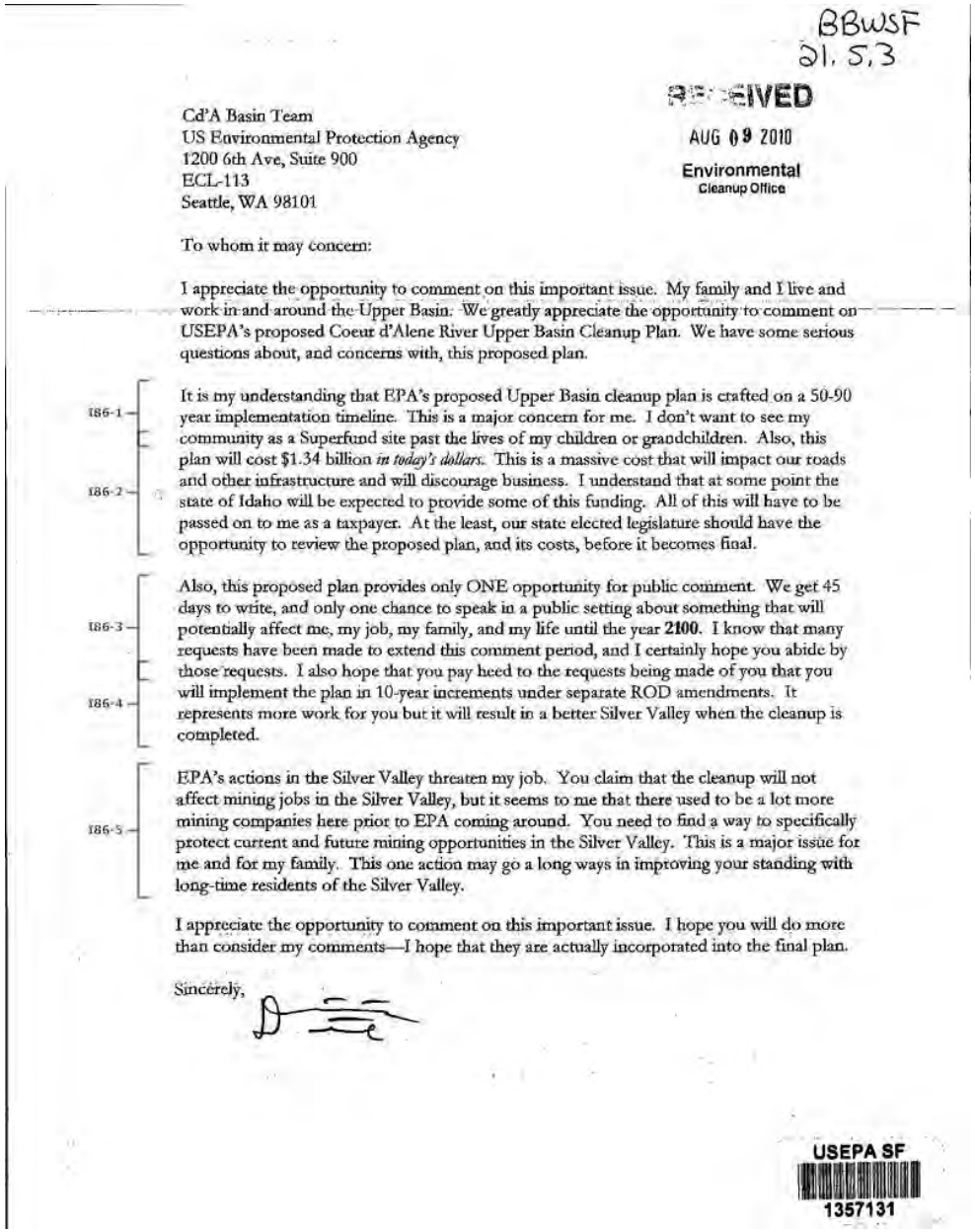
Response to comment I73-2
See response to Comment No. I58-2.

Response to comment I73-3
See response to Comment No. I58-3.

Response to comment I73-4
See response to Comment No. I58-4.

Response to comment I73-5
See response to Comment No. I58-5.

Unknown, Unknown, I86, Letter 1357131



BBWSF
21.5.3

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To whom it may concern:

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I86-1 — It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I86-2

I86-3 — Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I86-4

I86-5 — EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

USEPA SF
1357131

Response to comment I86-1
See response to Comment No. I58-1.

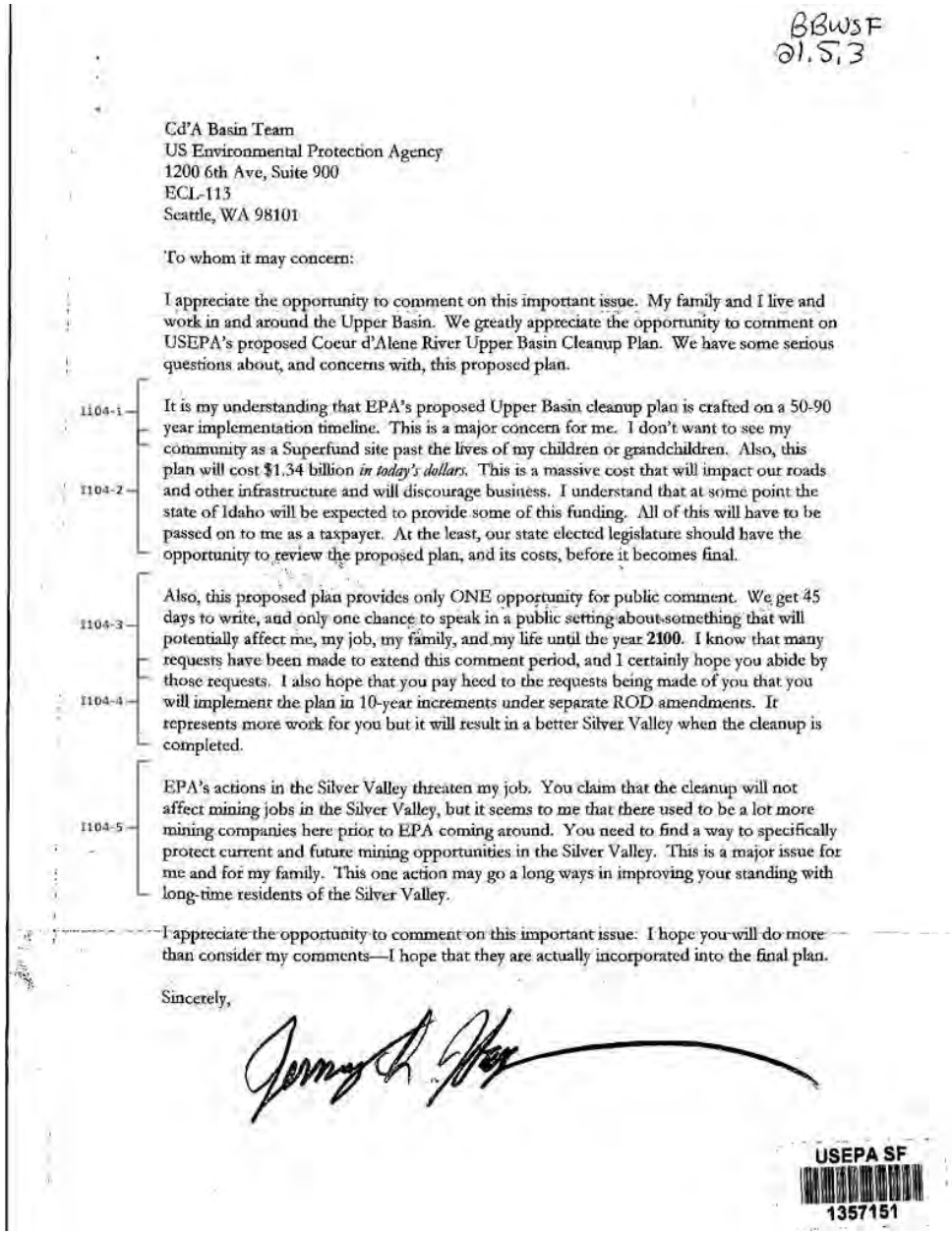
Response to comment I86-2
See response to Comment No. I58-2.

Response to comment I86-3
See response to Comment No. I58-3.

Response to comment I86-4
See response to Comment No. I58-4.

Response to comment I86-5
See response to Comment No. I58-5.

Unknown, Unknown, I104, Letter 1357151



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

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I104-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I104-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

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I104-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more
I104-5 mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

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Sincerely,

USEPA SF
1357151

Response to comment I104-1
See response to Comment No. I58-1.

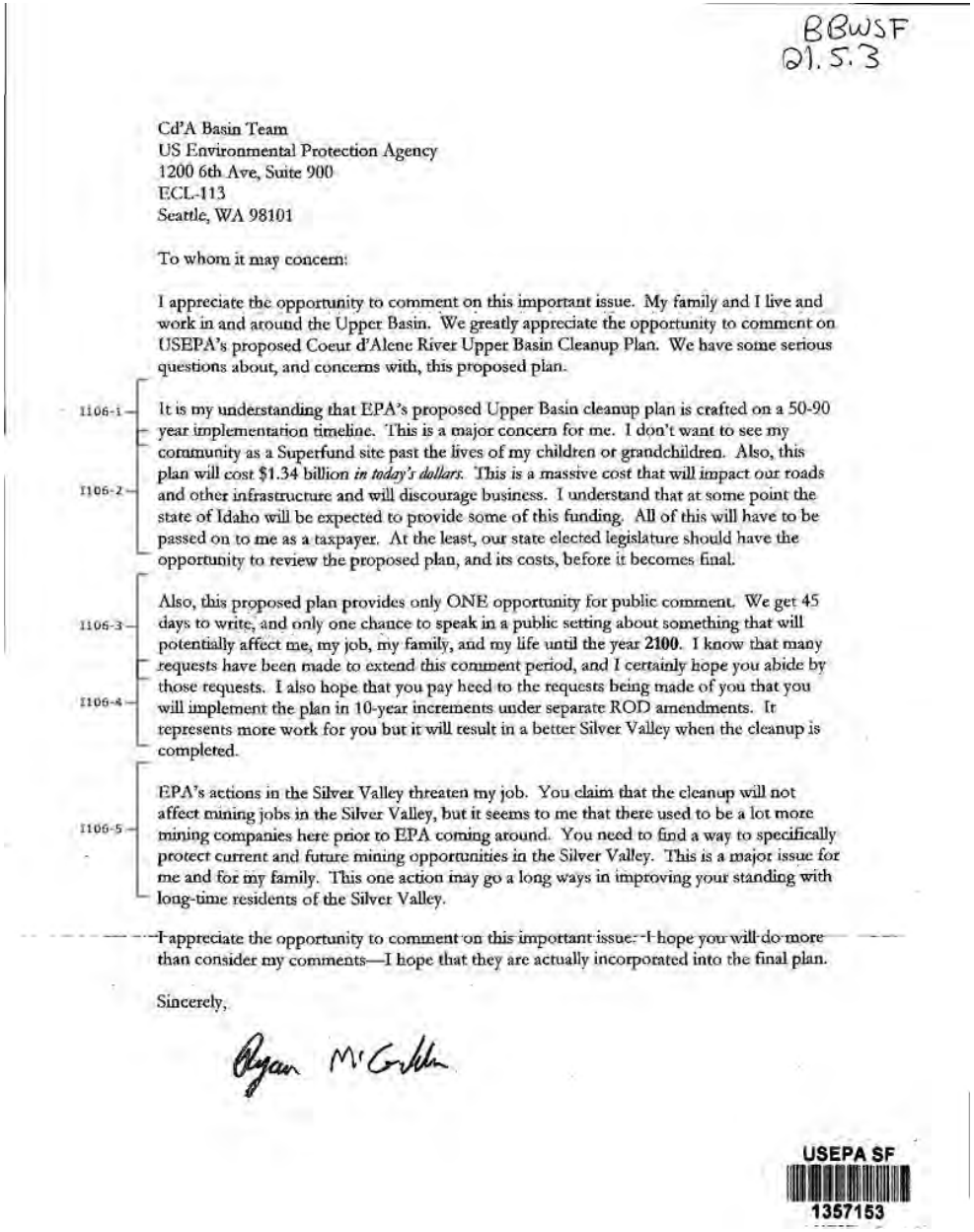
Response to comment I104-2
See response to Comment No. I58-2.

Response to comment I104-3
See response to Comment No. I58-3.

Response to comment I104-4
See response to Comment No. I58-4.

Response to comment I104-5
See response to Comment No. I58-5.

Unknown, Unknown, I106, Letter 1357153



BBWSF
01.5.3

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I106-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I106-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

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I106-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not

I106-5 affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Ryan McGrath

USEPA SF
1357153

Response to comment I106-1
See response to Comment No. I58-1.

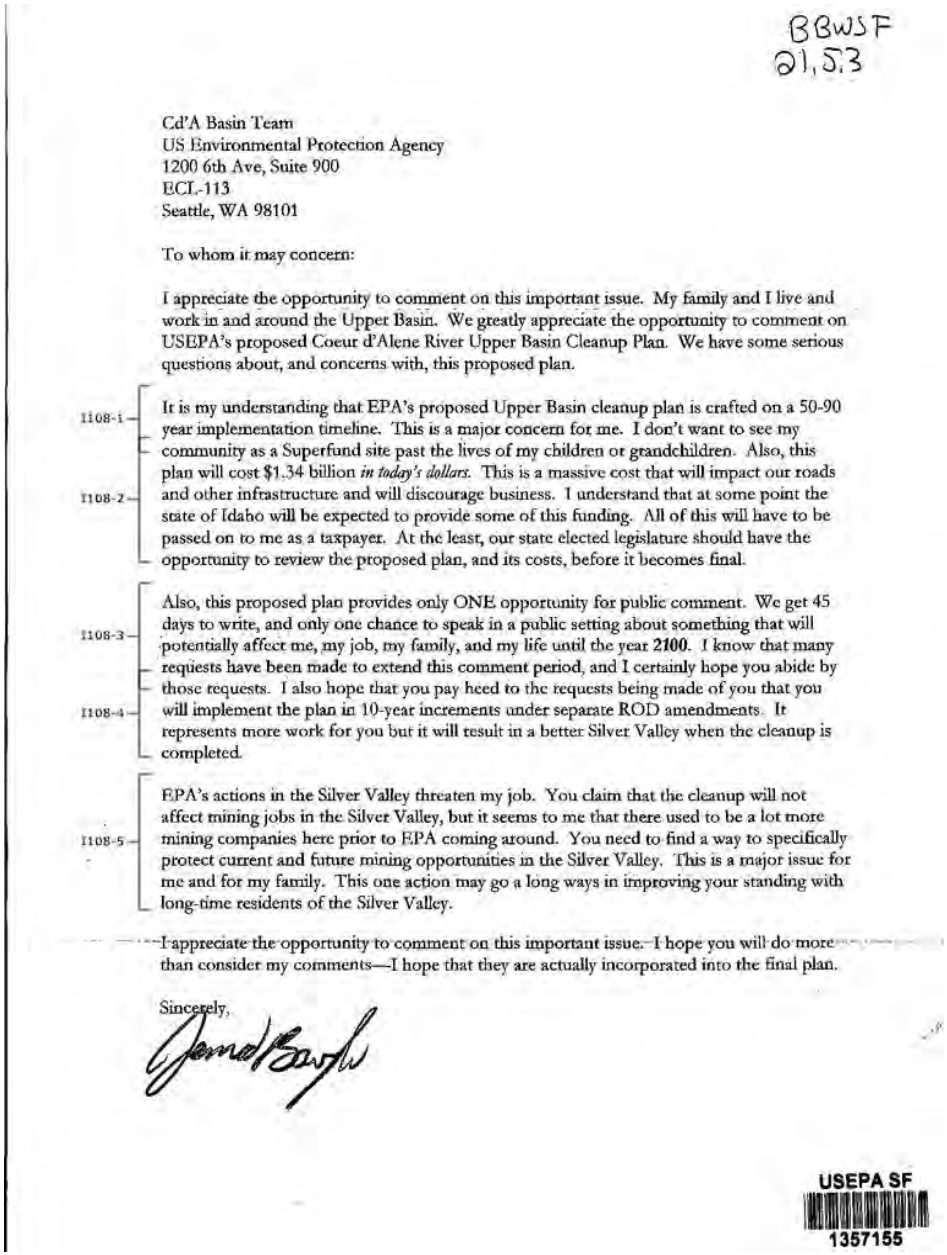
Response to comment I106-2
See response to Comment No. I58-2.

Response to comment I106-3
See response to Comment No. I58-3.

Response to comment I106-4
See response to Comment No. I58-4.

Response to comment I106-5
See response to Comment No. I58-5.

Unknown, Unknown, I108, Letter 1357155



BBWSF
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Sincerely,

USEPA SF
1357155

Response to comment I108-1
See response to Comment No. I58-1.

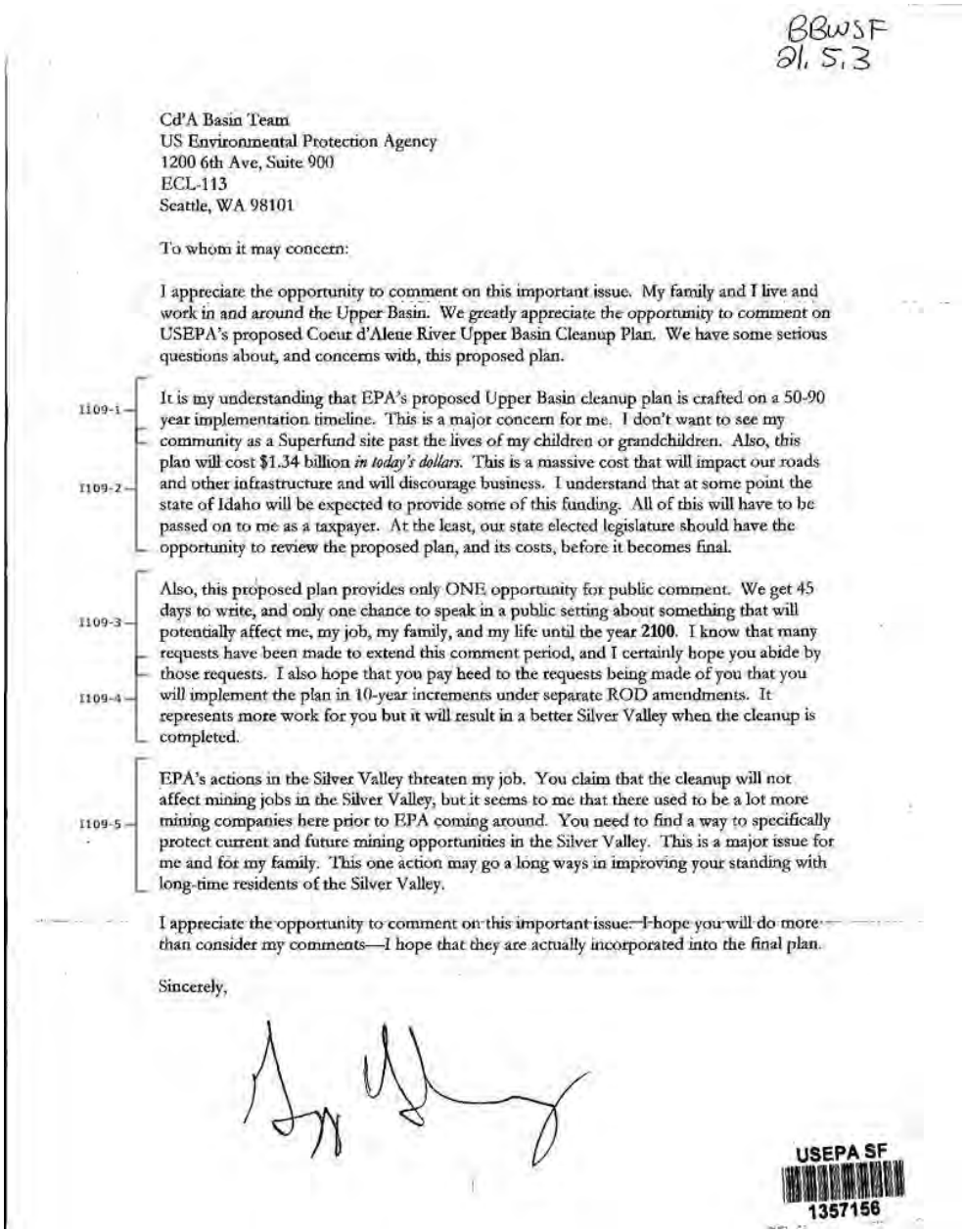
Response to comment I108-2
See response to Comment No. I58-2.

Response to comment I108-3
See response to Comment No. I58-3.

Response to comment I108-4
See response to Comment No. I58-4.

Response to comment I108-5
See response to Comment No. I58-5.

Unknown, Unknown, I109, Letter 1357156



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USEPA SF
1357156

Response to comment I109-1
See response to Comment No. I58-1.

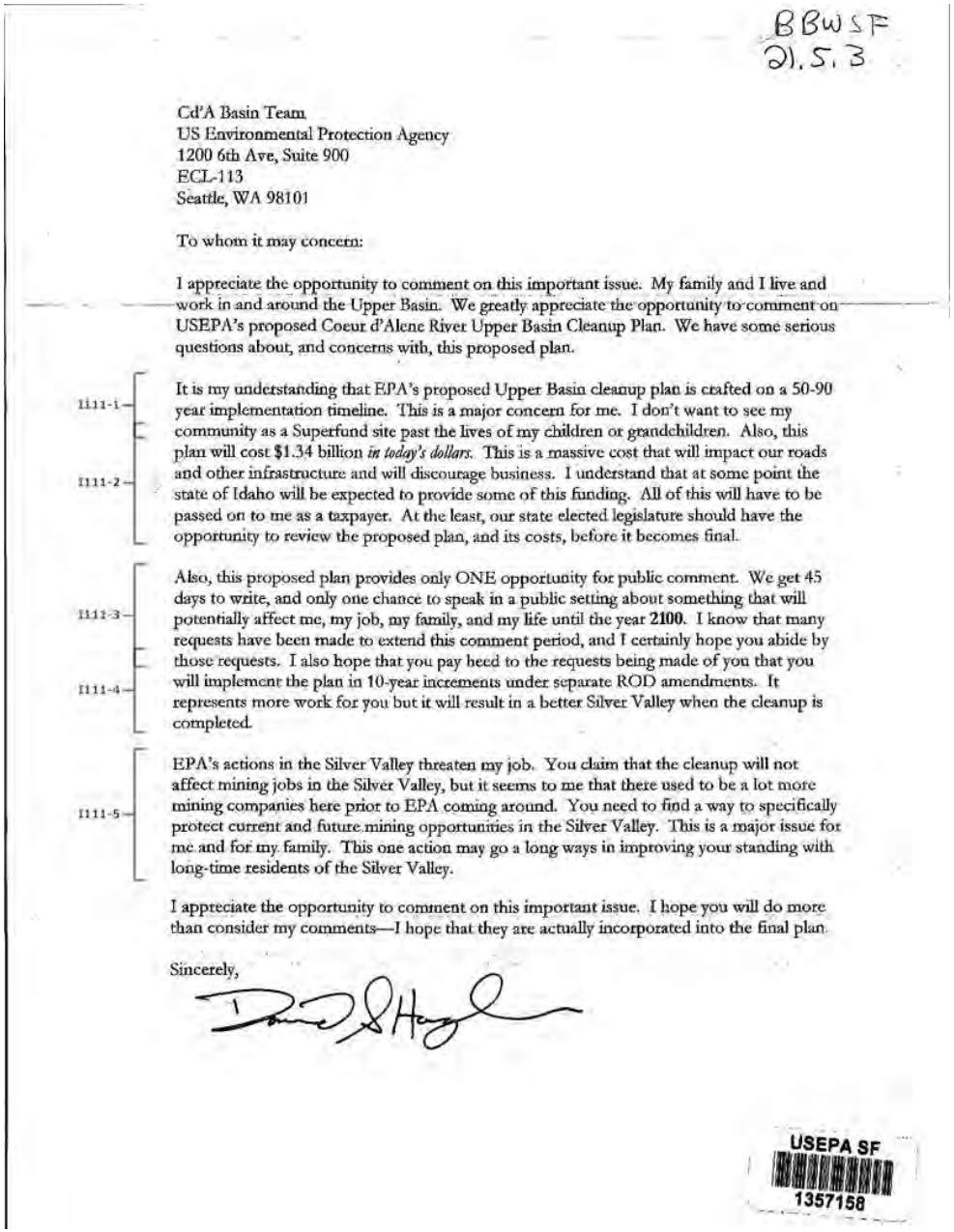
Response to comment I109-2
See response to Comment No. I58-2.

Response to comment I109-3
See response to Comment No. I58-3.

Response to comment I109-4
See response to Comment No. I58-4.

Response to comment I109-5
See response to Comment No. I58-5.

Unknown, Unknown, I111, Letter 1357158



BBWSF
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Response to comment I111-1
See response to Comment No. I58-1.

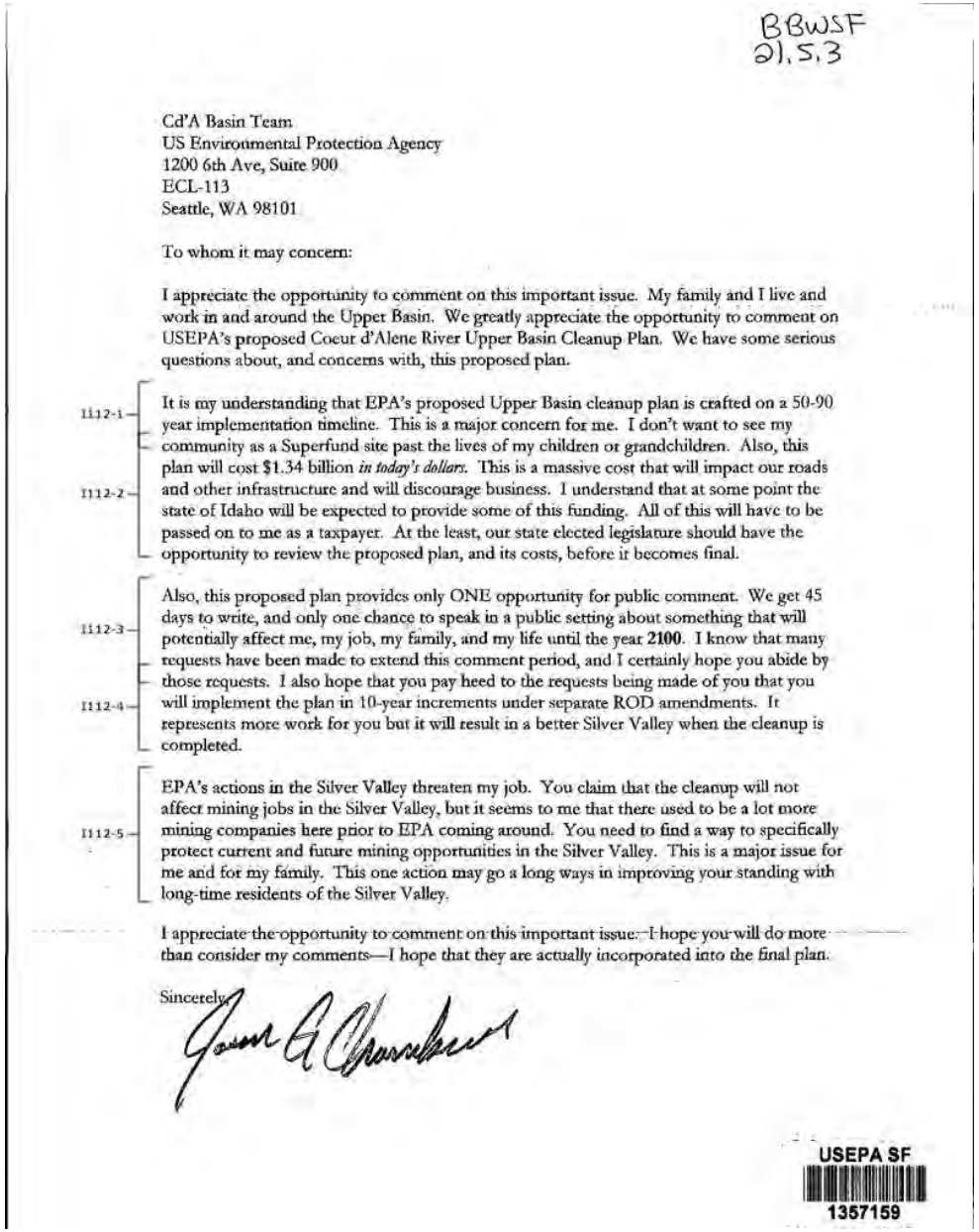
Response to comment I111-2
See response to Comment No. I58-2.

Response to comment I111-3
See response to Comment No. I58-3.

Response to comment I111-4
See response to Comment No. I58-4.

Response to comment I111-5
See response to Comment No. I58-5.

Unknown, Unknown, I112, Letter 1357159



BBWSF
21.5.3

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ECL-113
Seattle, WA 98101

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Sincerely,

USEPA SF
1357159

Response to comment I112-1
See response to Comment No. I58-1.

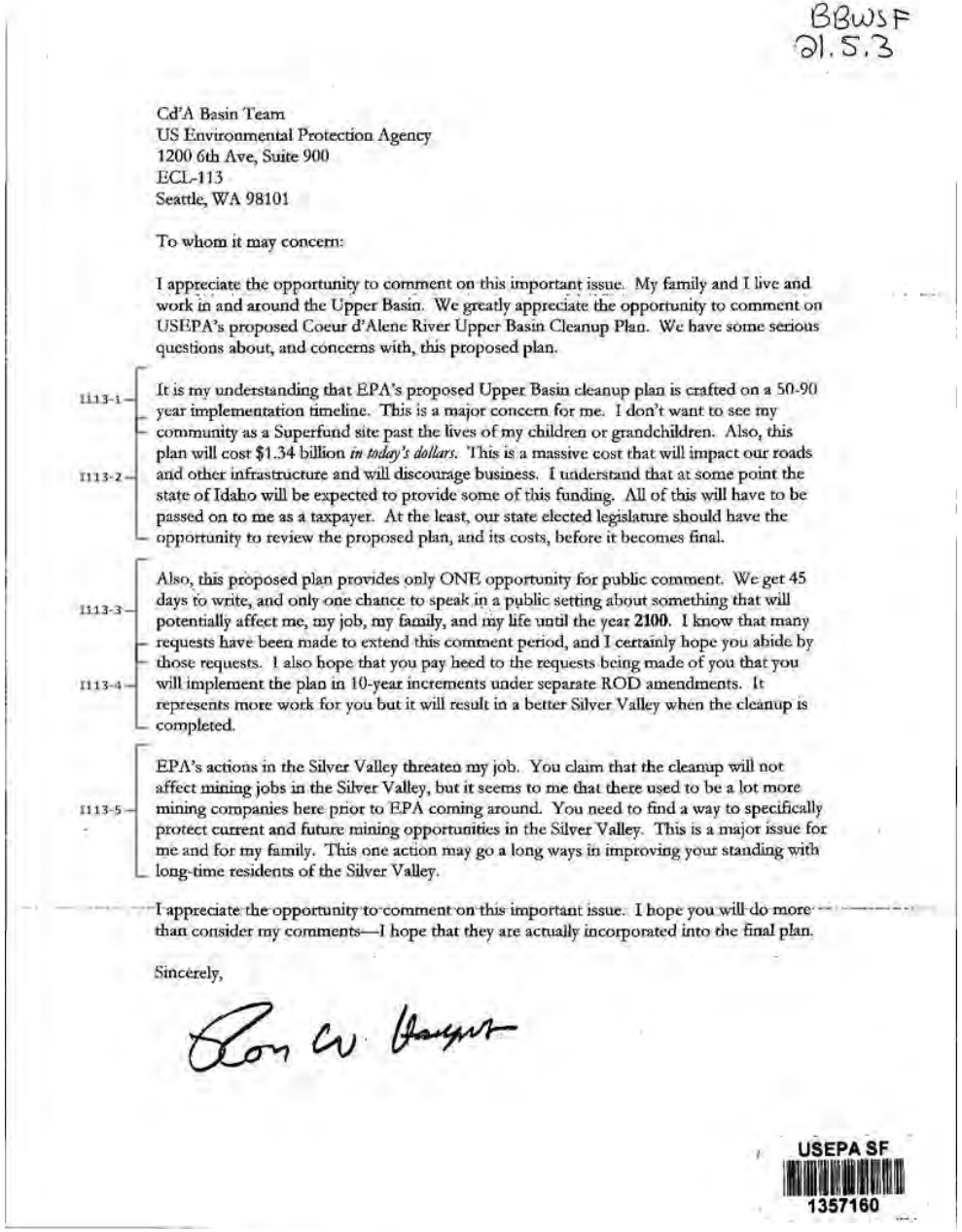
Response to comment I112-2
See response to Comment No. I58-2.

Response to comment I112-3
See response to Comment No. I58-3.

Response to comment I112-4
See response to Comment No. I58-4.

Response to comment I112-5
See response to Comment No. I58-5.

Unknown, Unknown, I113, Letter 1357160



BBWSF
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I113-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Ron W Haugen

USEPA SF
1357160

Response to comment I113-1
See response to Comment No. I58-1.

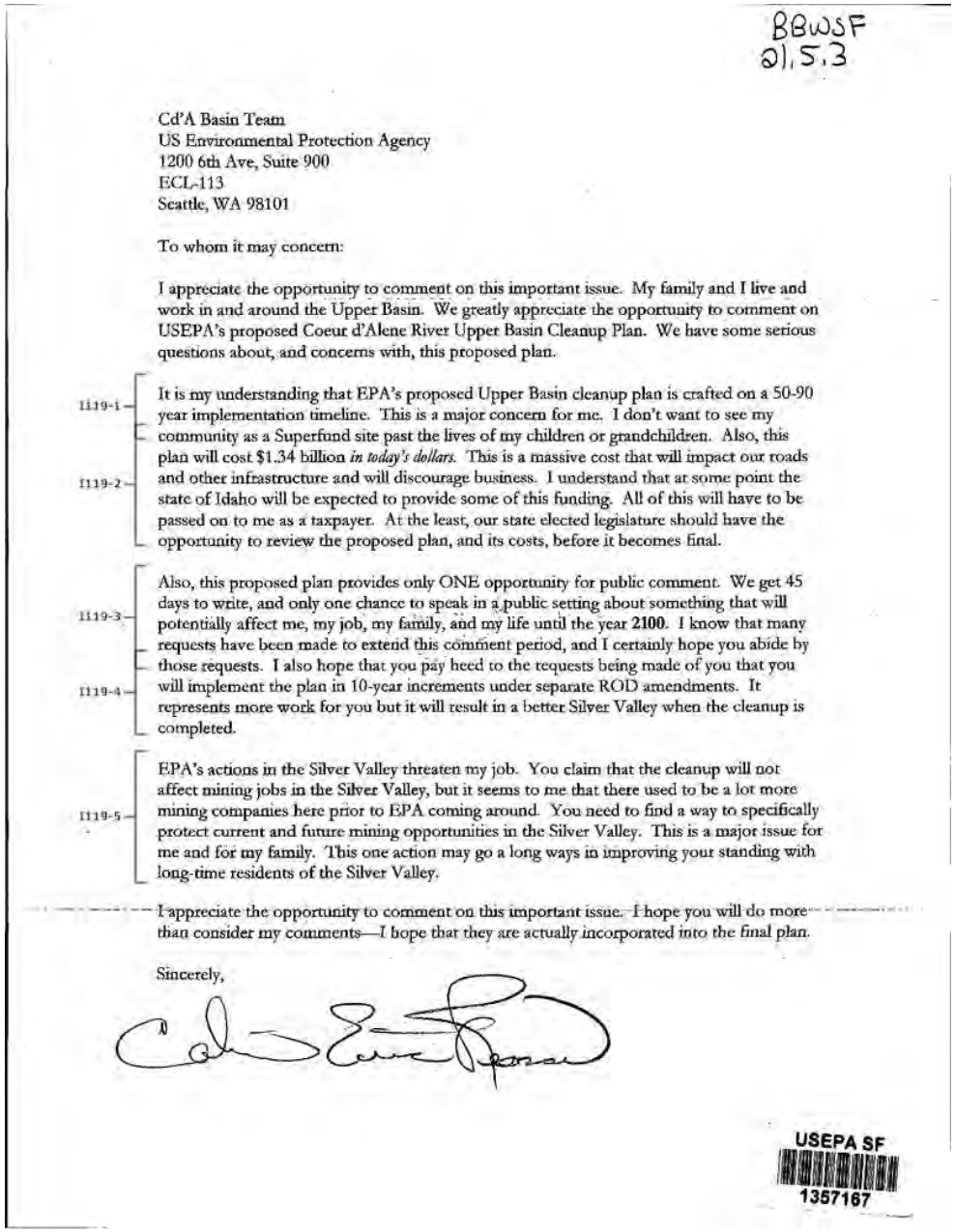
Response to comment I113-2
See response to Comment No. I58-2.

Response to comment I113-3
See response to Comment No. I58-3.

Response to comment I113-4
See response to Comment No. I58-4.

Response to comment I113-5
See response to Comment No. I58-5.

Unknown, Unknown, I119, Letter 1357167



BBWSF
21.5.3

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Sincerely,

USEPA SF
1357167

Response to comment I119-1
See response to Comment No. I58-1.

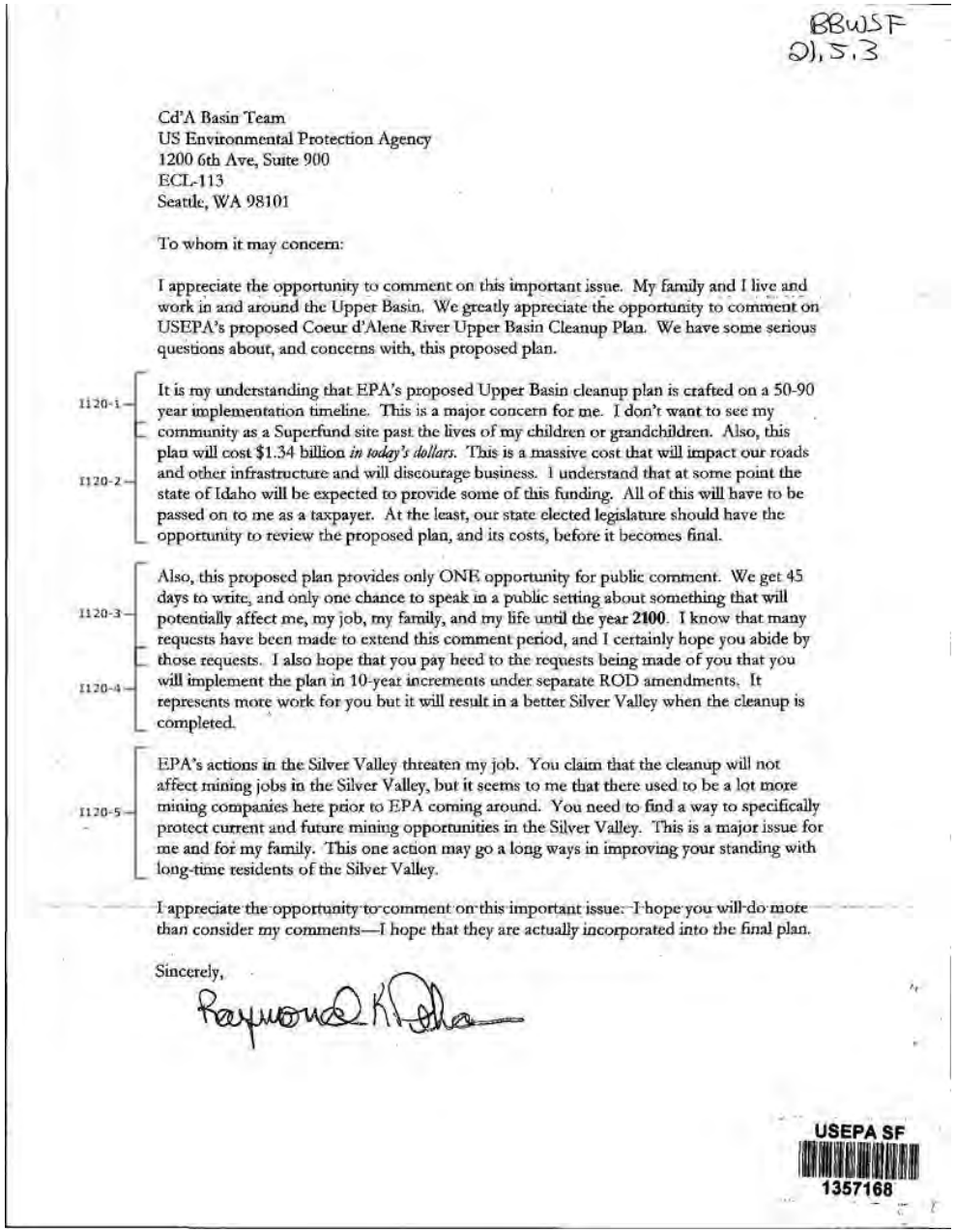
Response to comment I119-2
See response to Comment No. I58-2.

Response to comment I119-3
See response to Comment No. I58-3.

Response to comment I119-4
See response to Comment No. I58-4.

Response to comment I119-5
See response to Comment No. I58-5.

Unknown, Unknown, I120, Letter 1357168



BBWSF
D), 5.3

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I120-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

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Sincerely,

Raymond K Fisher

USEPA SF
1357168

Response to comment I120-1
See response to Comment No. I58-1.

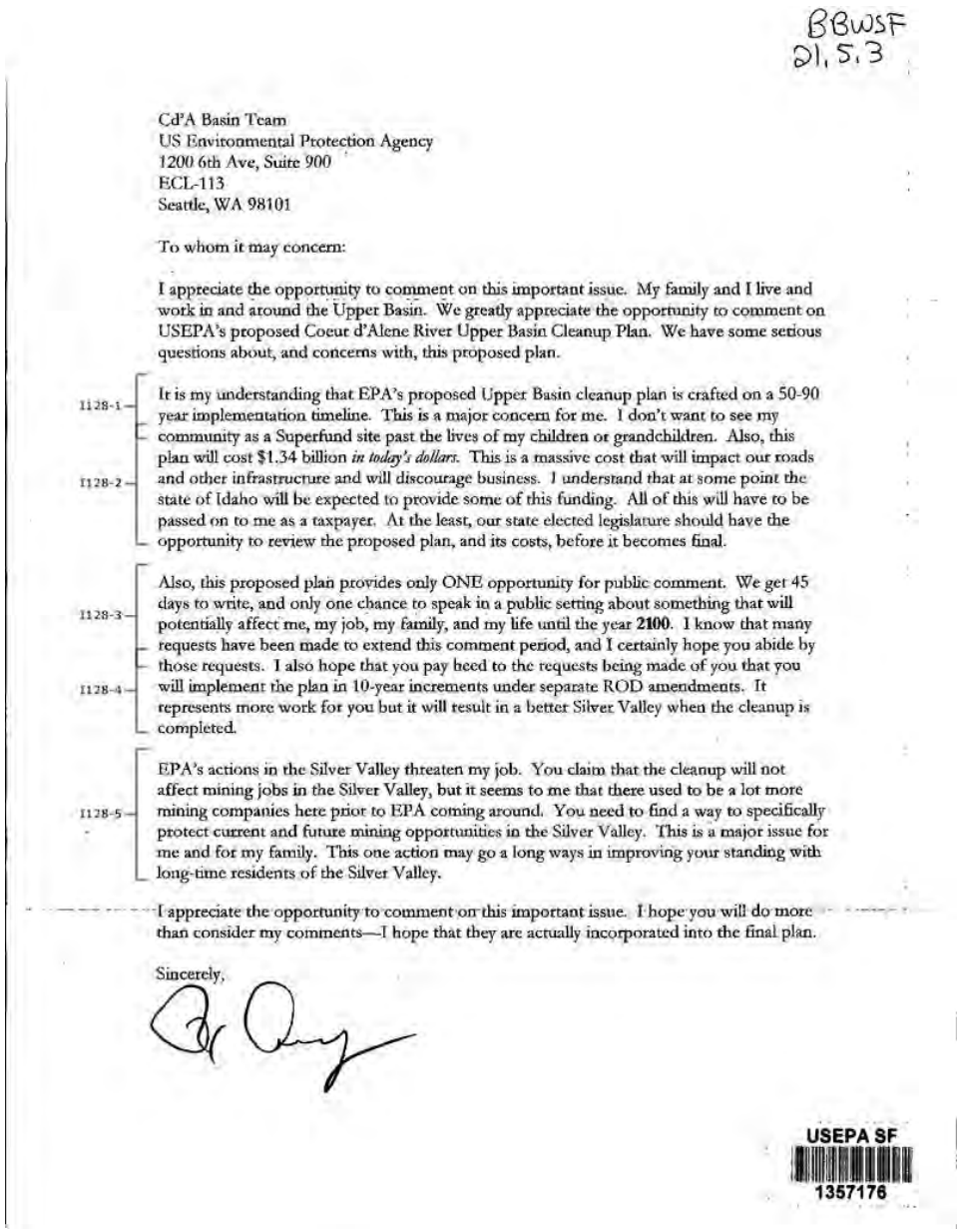
Response to comment I120-2
See response to Comment No. I58-2.

Response to comment I120-3
See response to Comment No. I58-3.

Response to comment I120-4
See response to Comment No. I58-4.

Response to comment I120-5
See response to Comment No. I58-5.

Unknown, Unknown, I128, Letter 1357176



BBWSF
21.5.3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I128-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I128-2

I128-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I128-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I128-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

USEPA SF
1357176

Response to comment I128-1
See response to Comment No. I58-1.

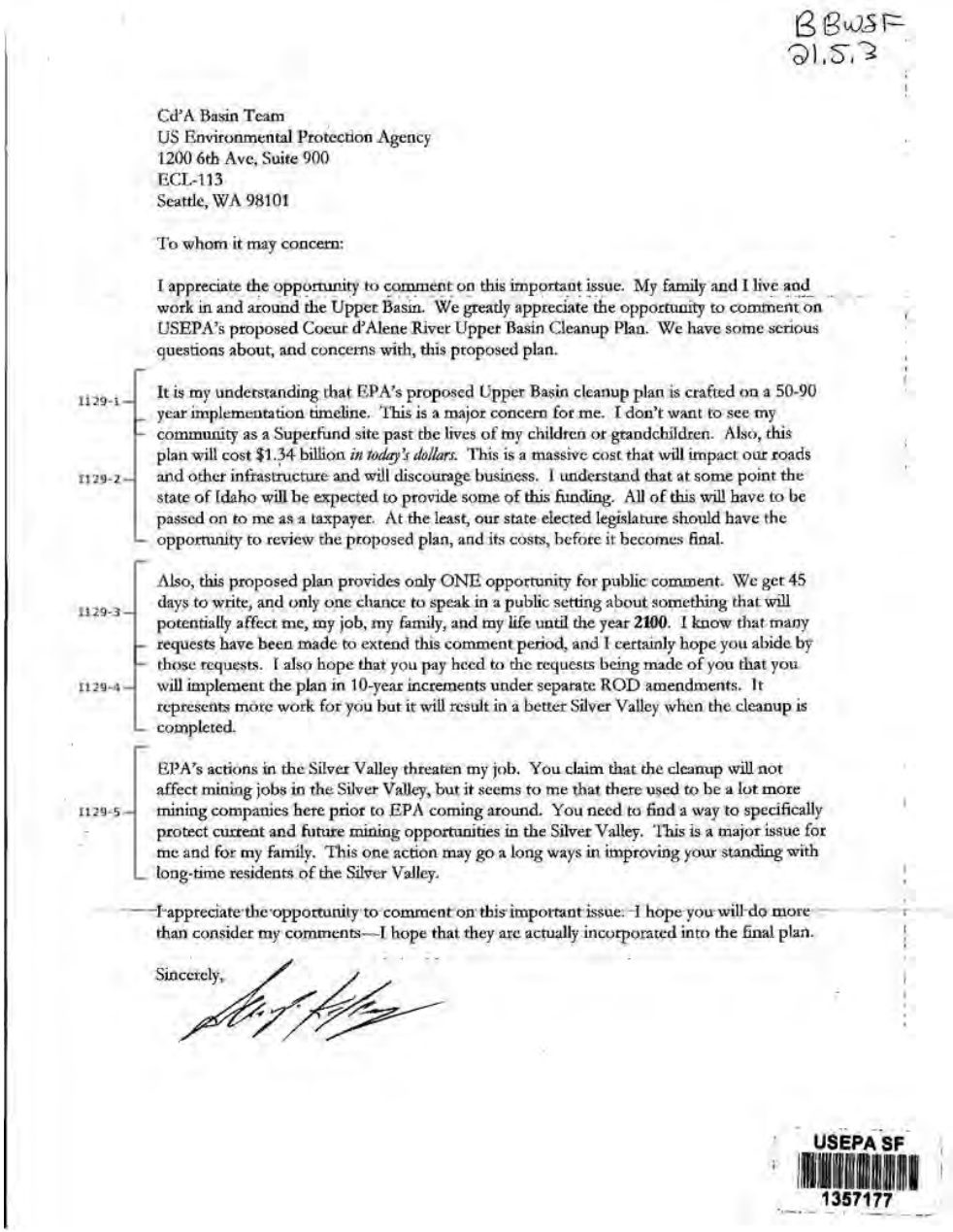
Response to comment I128-2
See response to Comment No. I58-2.

Response to comment I128-3
See response to Comment No. I58-3.

Response to comment I128-4
See response to Comment No. I58-4.

Response to comment I128-5
See response to Comment No. I58-5.

Unknown, Unknown, I129, Letter 1357177



BBWSF
21.5.3

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I129-2 — plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

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1357177

Response to comment I129-1
See response to Comment No. I58-1.

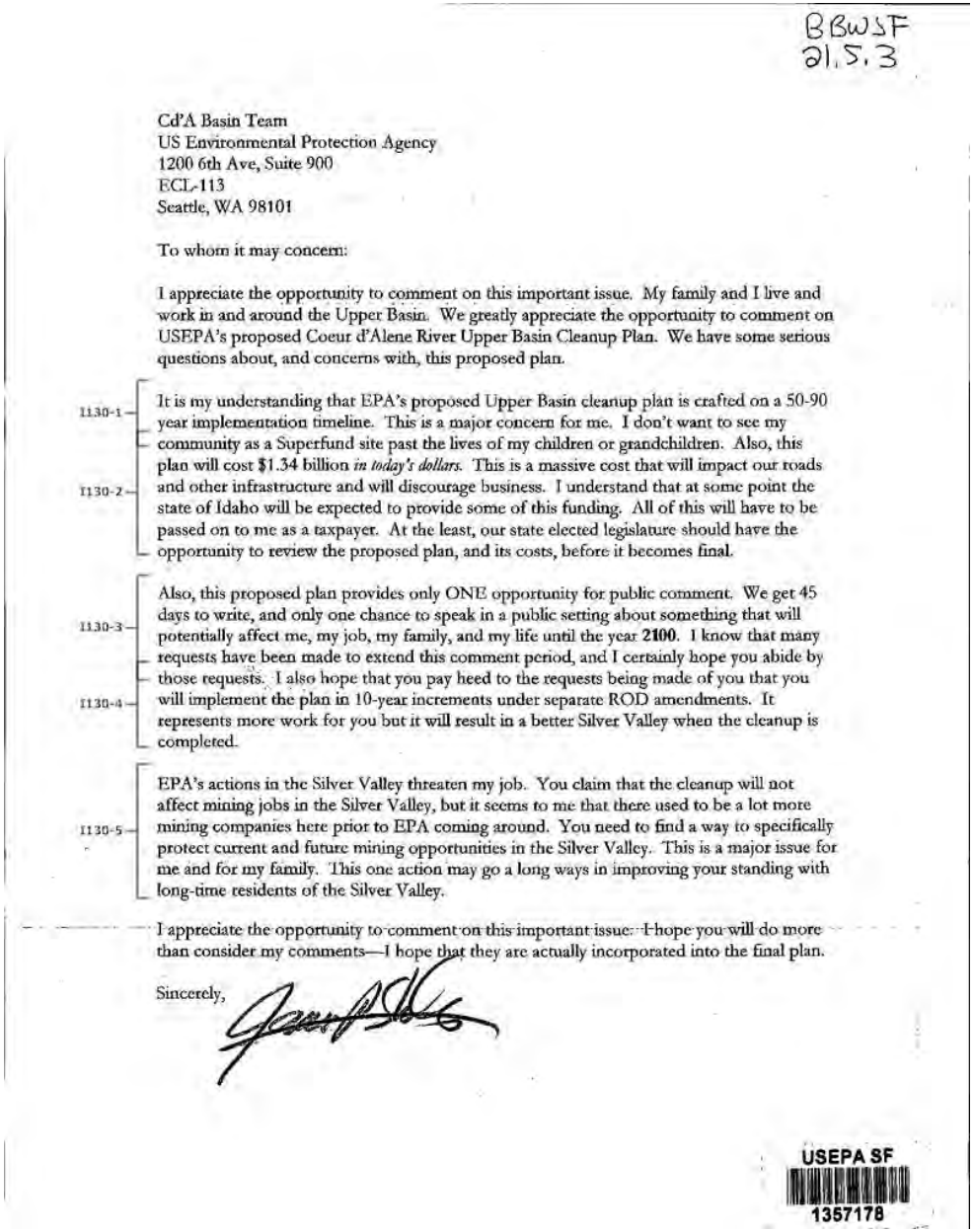
Response to comment I129-2
See response to Comment No. I58-2.

Response to comment I129-3
See response to Comment No. I58-3.

Response to comment I129-4
See response to Comment No. I58-4.

Response to comment I129-5
See response to Comment No. I58-5.

Unknown, Unknown, I130, Letter 1357178



BBWSF
21.5.3

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I130-2

I130-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I130-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

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USEPA SF
1357178

Response to comment I130-1
See response to Comment No. I58-1.

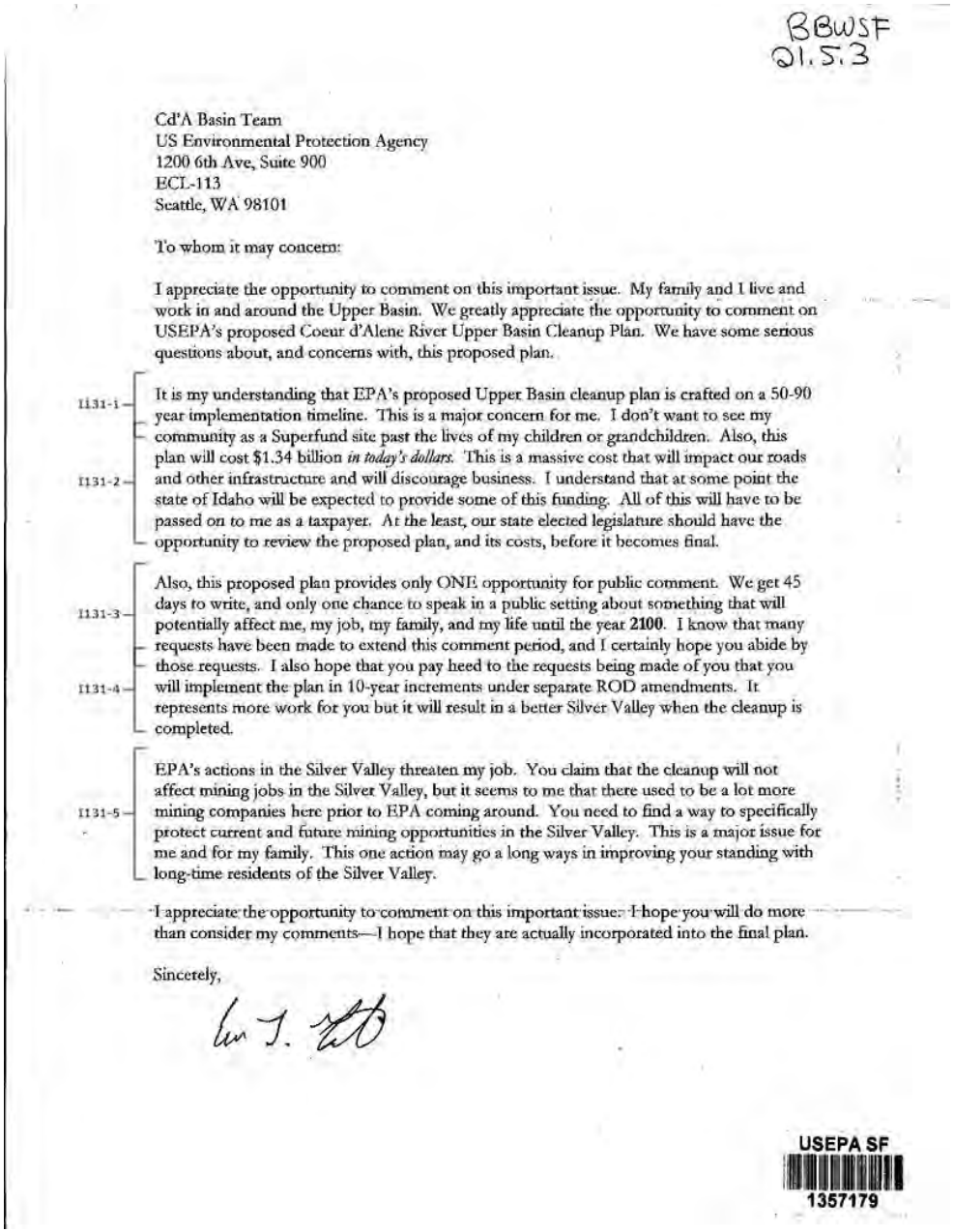
Response to comment I130-2
See response to Comment No. I58-2.

Response to comment I130-3
See response to Comment No. I58-3.

Response to comment I130-4
See response to Comment No. I58-4.

Response to comment I130-5
See response to Comment No. I58-5.

Unknown, Unknown, I131, Letter 1357179



BBWSF
21.5.3

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ECL-113
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USEPA SF
1357179

Response to comment I131-1
See response to Comment No. I58-1.

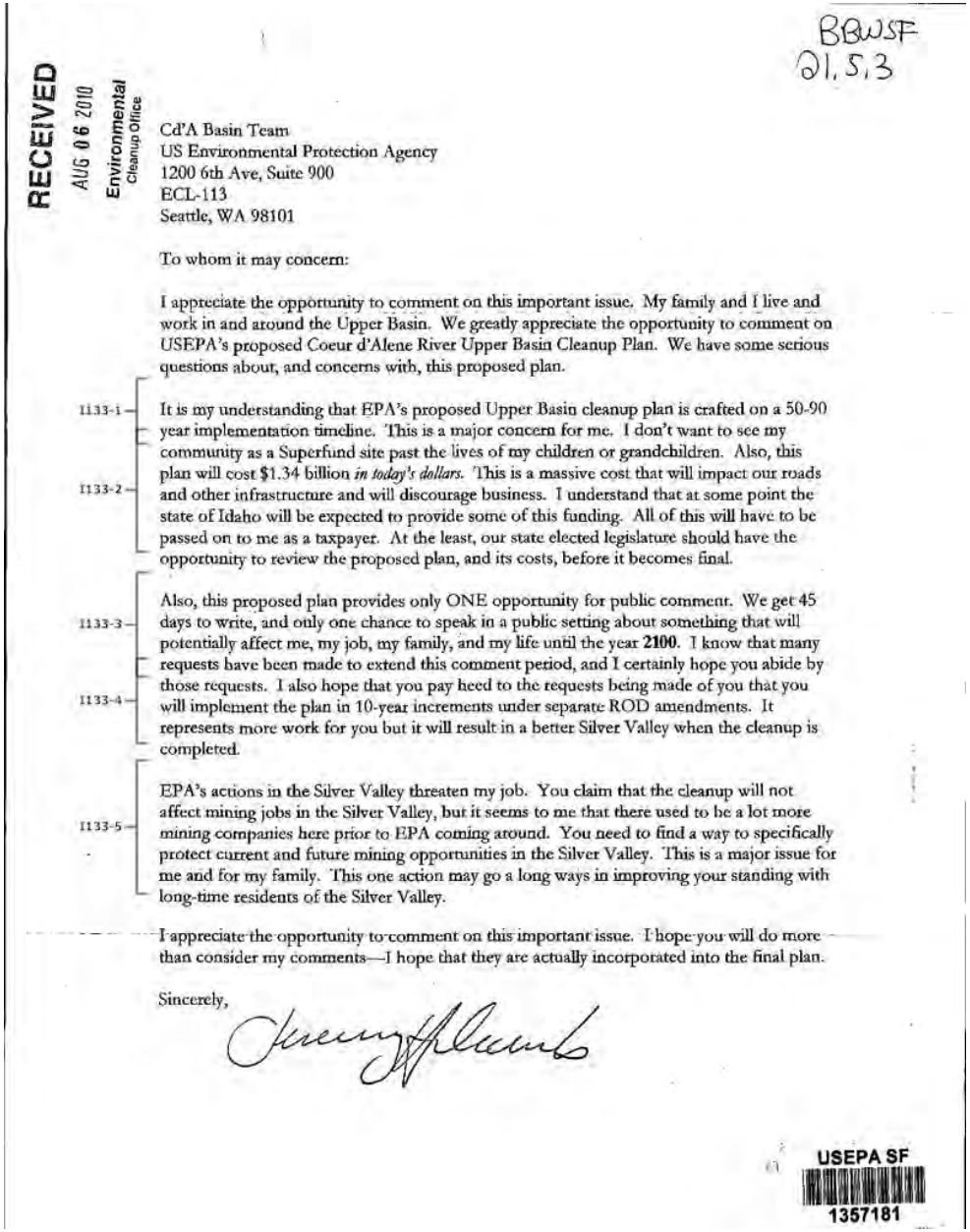
Response to comment I131-2
See response to Comment No. I58-2.

Response to comment I131-3
See response to Comment No. I58-3.

Response to comment I131-4
See response to Comment No. I58-4.

Response to comment I131-5
See response to Comment No. I58-5.

Unknown, Unknown, I133, Letter 1357181



BBWSF
21.5.3

RECEIVED
AUG 06 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

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1357181

Response to comment I133-1
See response to Comment No. I58-1.

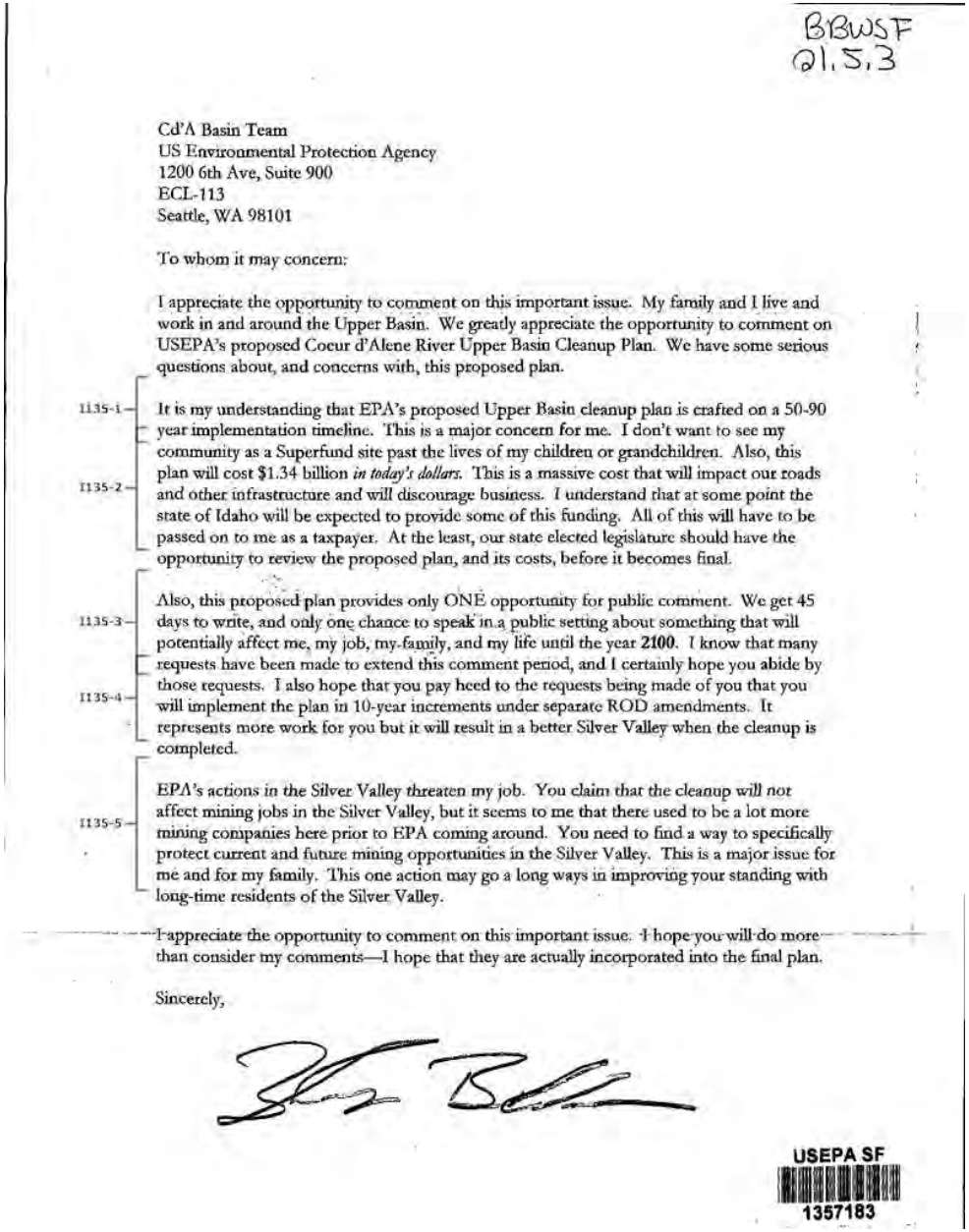
Response to comment I133-2
See response to Comment No. I58-2.

Response to comment I133-3
See response to Comment No. I58-3.

Response to comment I133-4
See response to Comment No. I58-4.

Response to comment I133-5
See response to Comment No. I58-5.

Unknown, Unknown, I135, Letter 1357183



BBWSF
21.5.3

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1200 6th Ave, Suite 900
ECL-113
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I135-5 affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

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USEPA SF
1357183

Response to comment I135-1
See response to Comment No. I58-1.

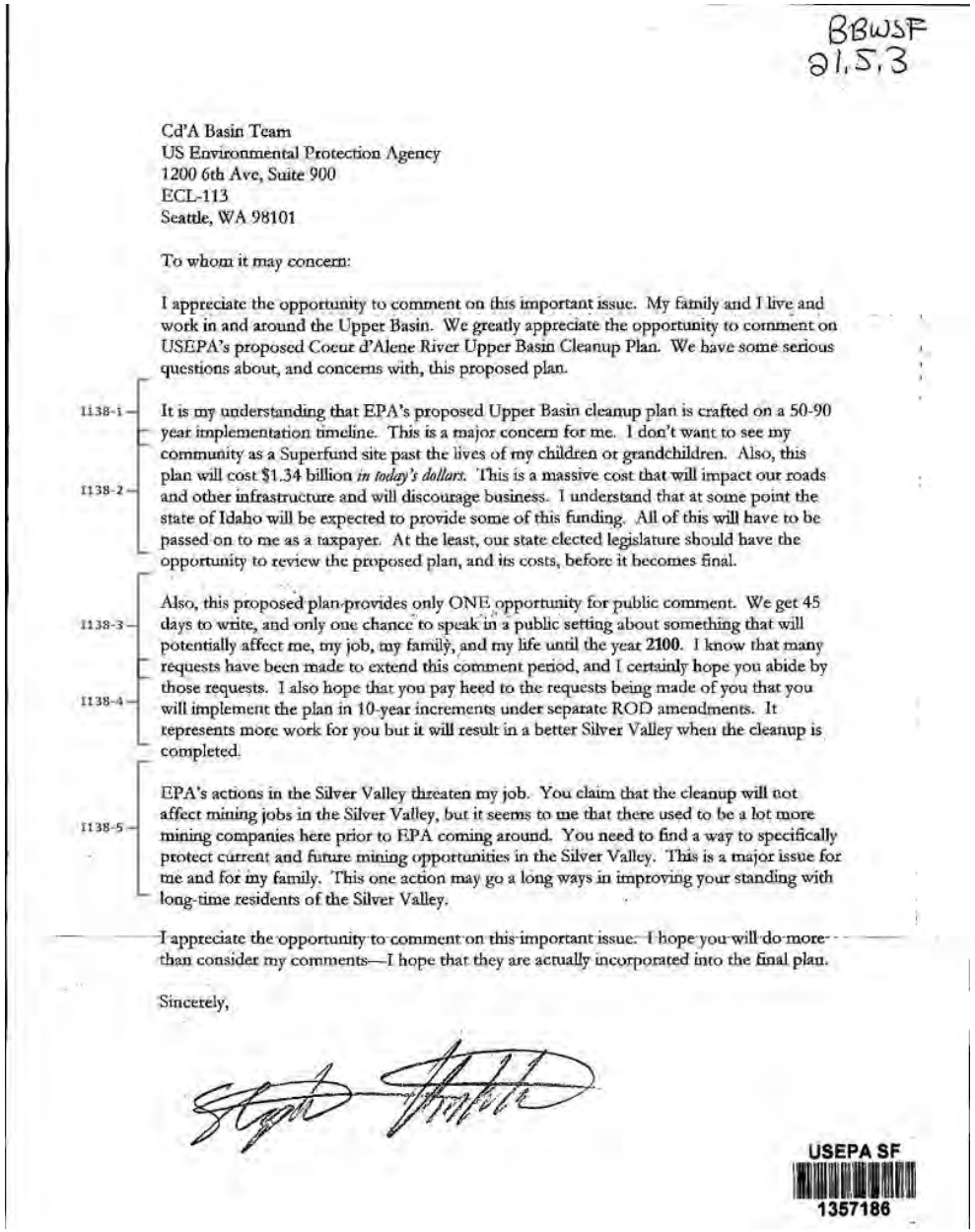
Response to comment I135-2
See response to Comment No. I58-2.

Response to comment I135-3
See response to Comment No. I58-3.

Response to comment I135-4
See response to Comment No. I58-4.

Response to comment I135-5
See response to Comment No. I58-5.

Unknown, Unknown, I138, Letter 1357186



BBWSF
21.5.3

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I138-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

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USEPA SF
1357186

Response to comment I138-1
See response to Comment No. I58-1.

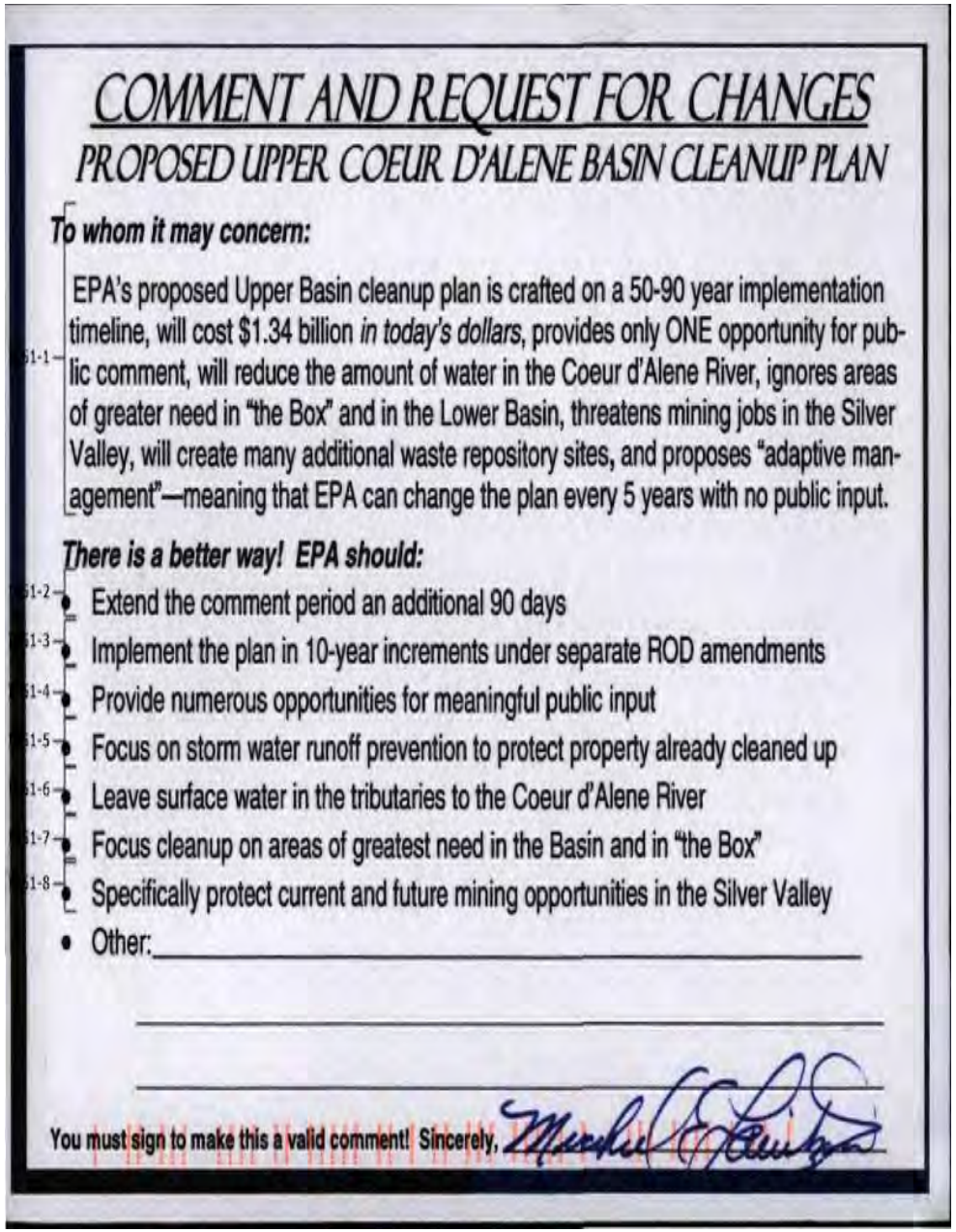
Response to comment I138-2
See response to Comment No. I58-2.

Response to comment I138-3
See response to Comment No. I58-3.

Response to comment I138-4
See response to Comment No. I58-4.

Response to comment I138-5
See response to Comment No. I58-5.

Unknown, Unknown, I151, Letter 1357287



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I151-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I151-2 Extend the comment period an additional 90 days
- I151-3 Implement the plan in 10-year increments under separate ROD amendments
- I151-4 Provide numerous opportunities for meaningful public input
- I151-5 Focus on storm water runoff prevention to protect property already cleaned up
- I151-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I151-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I151-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely,

Response to comment I151-1
See response to Comment No. I25-1.

Response to comment I151-2
See response to Comment No. I25-2.

Response to comment I151-3
See response to Comment No. I25-3.

Response to comment I151-4
See response to Comment No. I25-4.

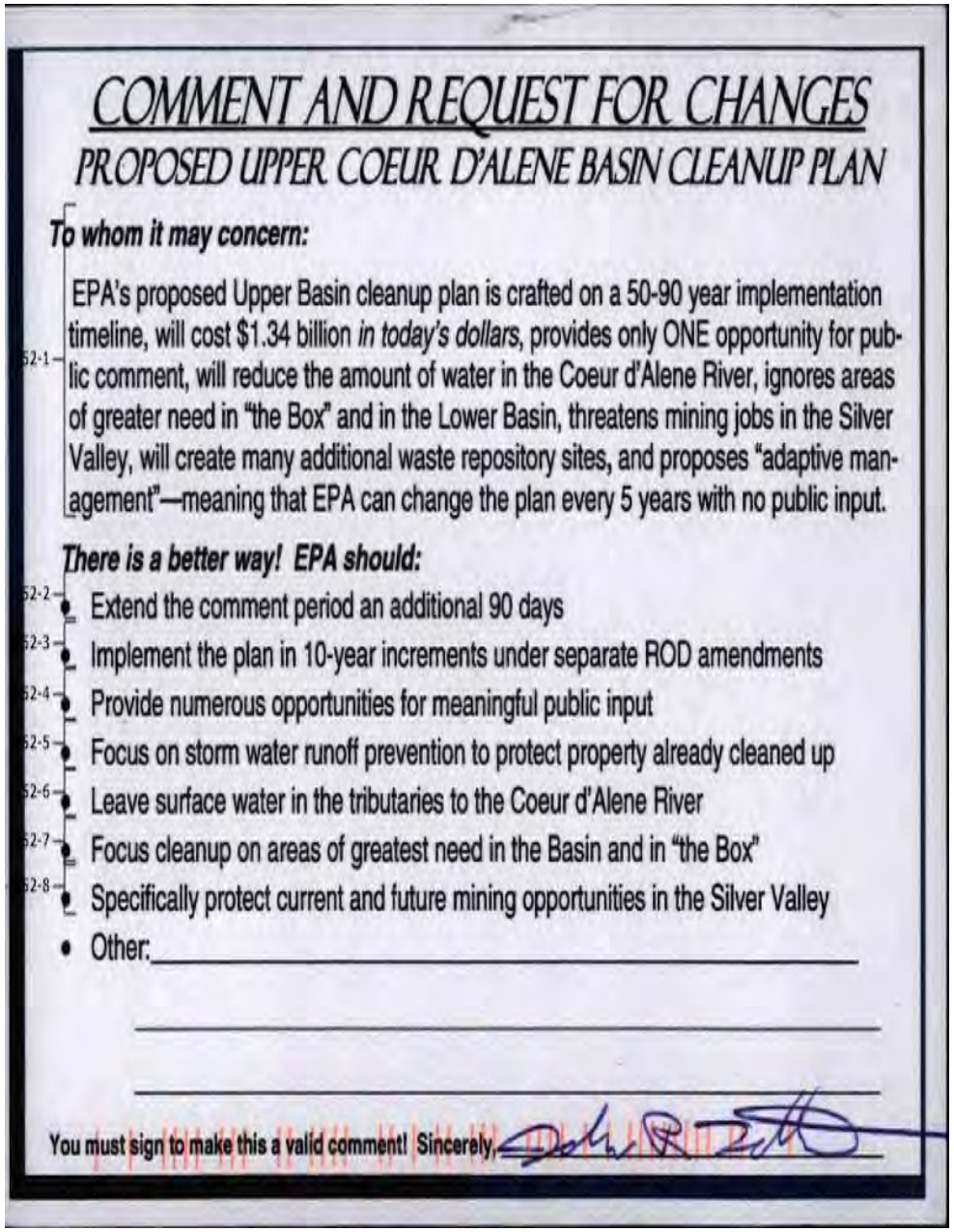
Response to comment I151-5
See response to Comment No. I25-5.

Response to comment I151-6
See response to Comment No. I25-6.

Response to comment I151-7
See response to Comment No. I25-7.

Response to comment I151-8
See response to Comment No. I25-8.

Unknown, Unknown, I152, Letter 1357288



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I52-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I52-2 Extend the comment period an additional 90 days
- I52-3 Implement the plan in 10-year increments under separate ROD amendments
- I52-4 Provide numerous opportunities for meaningful public input
- I52-5 Focus on storm water runoff prevention to protect property already cleaned up
- I52-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I52-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I52-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

_____

_____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I152-1
See response to Comment No. I25-1.

Response to comment I152-2
See response to Comment No. I25-2.

Response to comment I152-3
See response to Comment No. I25-3.

Response to comment I152-4
See response to Comment No. I25-4.

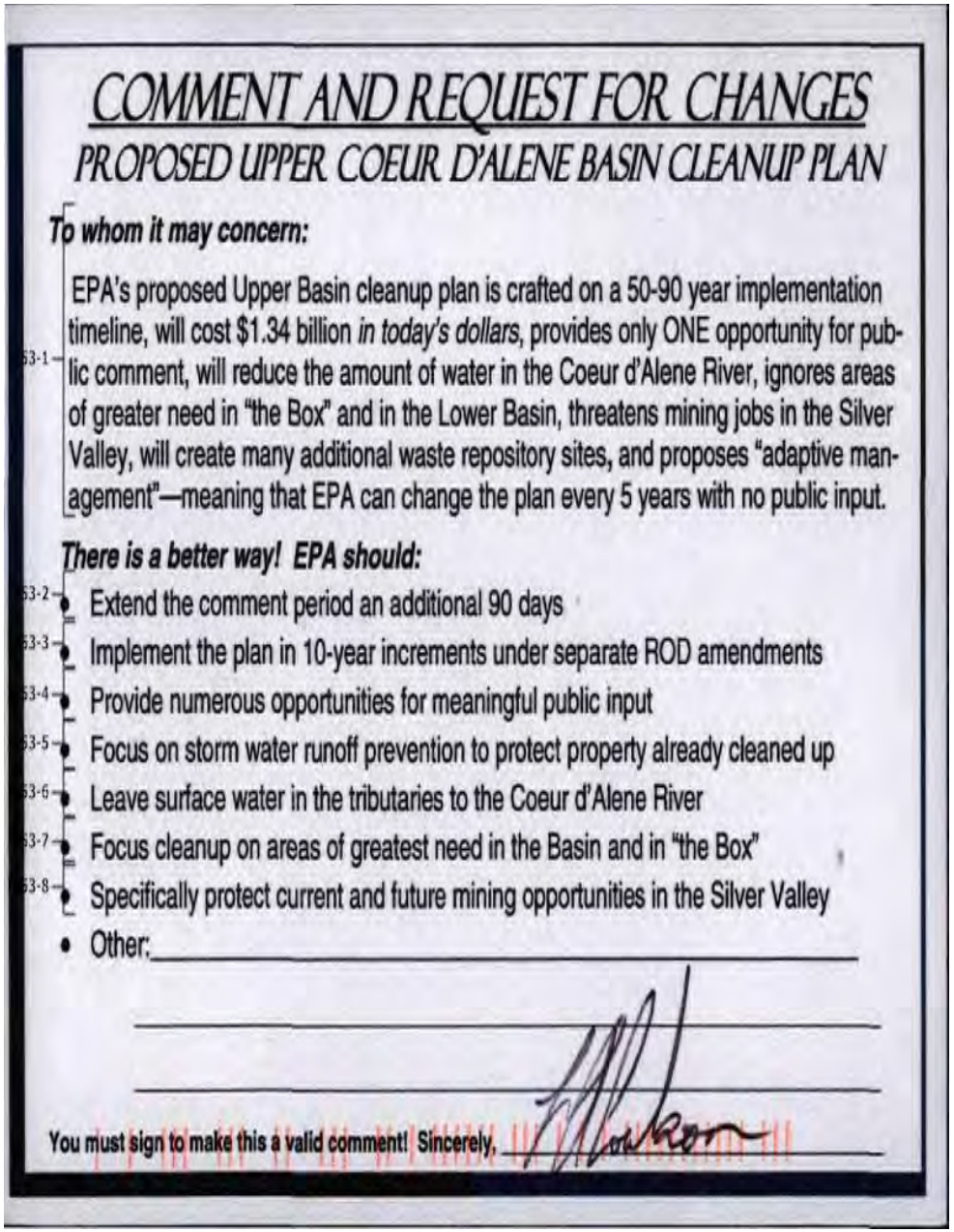
Response to comment I152-5
See response to Comment No. I25-5.

Response to comment I152-6
See response to Comment No. I25-6.

Response to comment I152-7
See response to Comment No. I25-7.

Response to comment I152-8
See response to Comment No. I25-8.

Unknown, Unknown, I153, Letter 1357289



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

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- I53-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I153-1
See response to Comment No. I25-1.

Response to comment I153-2
See response to Comment No. I25-2.

Response to comment I153-3
See response to Comment No. I25-3.

Response to comment I153-4
See response to Comment No. I25-4.

Response to comment I153-5
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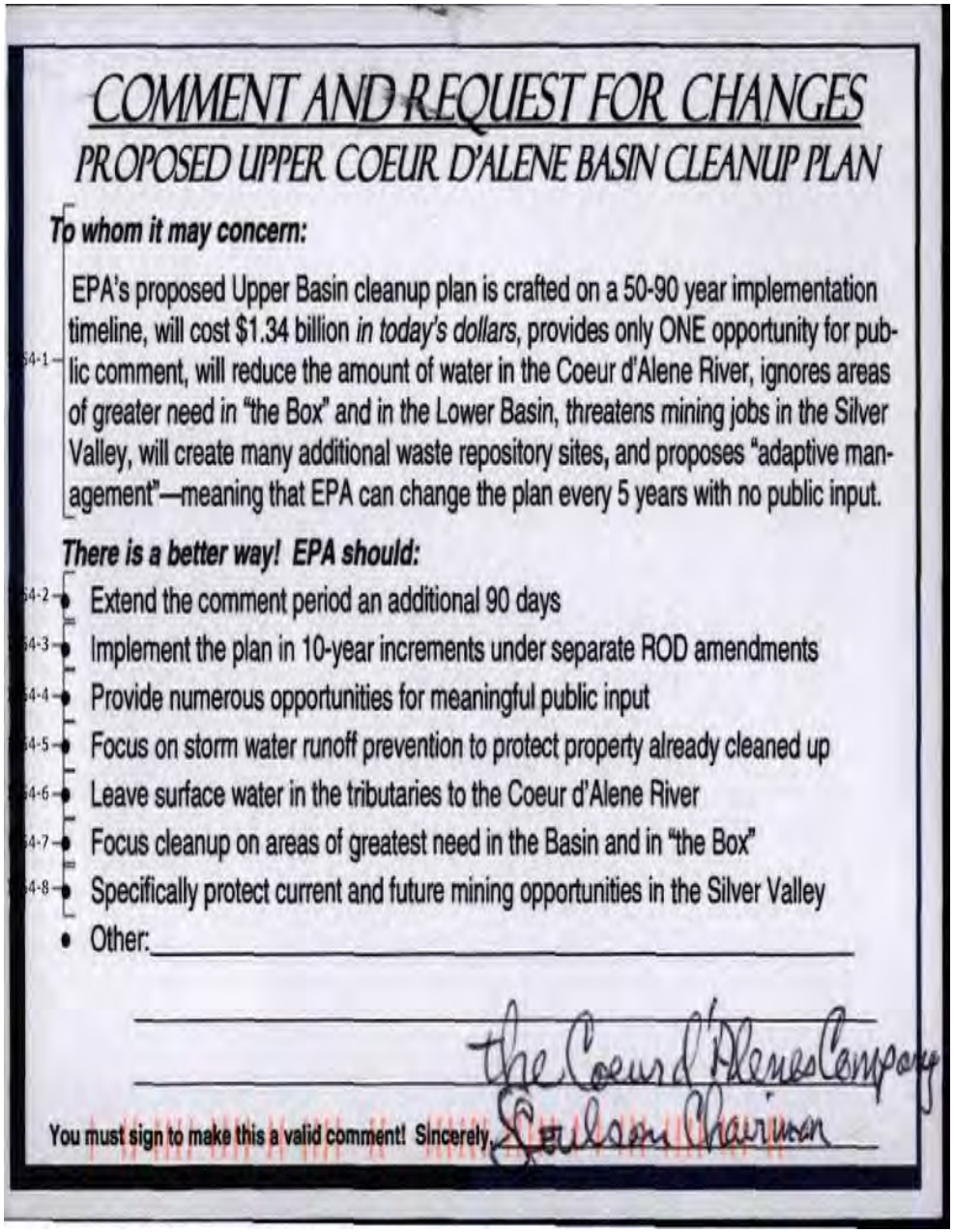
Response to comment I153-6
See response to Comment No. I25-6.

Response to comment I153-7
See response to Comment No. I25-7.

Response to comment I153-8
See response to Comment No. I25-8.

Unknown, Unknown, I154, Letter 1357290



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I54-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I54-2 Extend the comment period an additional 90 days
- I54-3 Implement the plan in 10-year increments under separate ROD amendments
- I54-4 Provide numerous opportunities for meaningful public input
- I54-5 Focus on storm water runoff prevention to protect property already cleaned up
- I54-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I54-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I54-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

the Coeur d'Alenes Company

You must sign to make this a valid comment! Sincerely, Paulsen Chairman

Response to comment I154-1
See response to Comment No. I25-1.

Response to comment I154-2
See response to Comment No. I25-2.

Response to comment I154-3
See response to Comment No. I25-3.

Response to comment I154-4
See response to Comment No. I25-4.

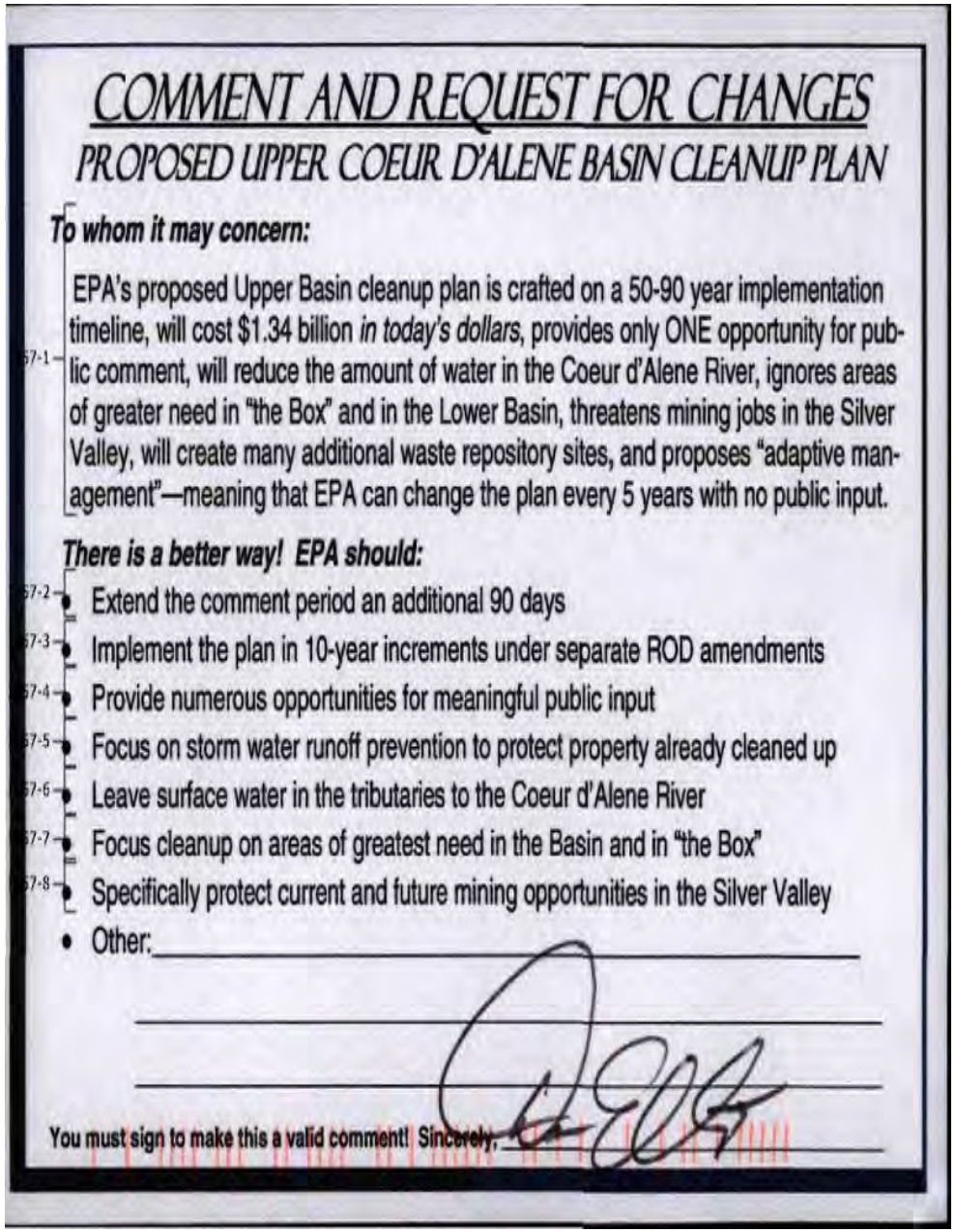
Response to comment I154-5
See response to Comment No. I25-5.

Response to comment I154-6
See response to Comment No. I25-6.

Response to comment I154-7
See response to Comment No. I25-7.

Response to comment I154-8
See response to Comment No. I25-8.

Unknown, Unknown, I157, Letter 1357293



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I57-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I57-2 Extend the comment period an additional 90 days
- I57-3 Implement the plan in 10-year increments under separate ROD amendments
- I57-4 Provide numerous opportunities for meaningful public input
- I57-5 Focus on storm water runoff prevention to protect property already cleaned up
- I57-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I57-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I57-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely,_____

Response to comment I157-1
See response to Comment No. I25-1.

Response to comment I157-2
See response to Comment No. I25-2.

Response to comment I157-3
See response to Comment No. I25-3.

Response to comment I157-4
See response to Comment No. I25-4.

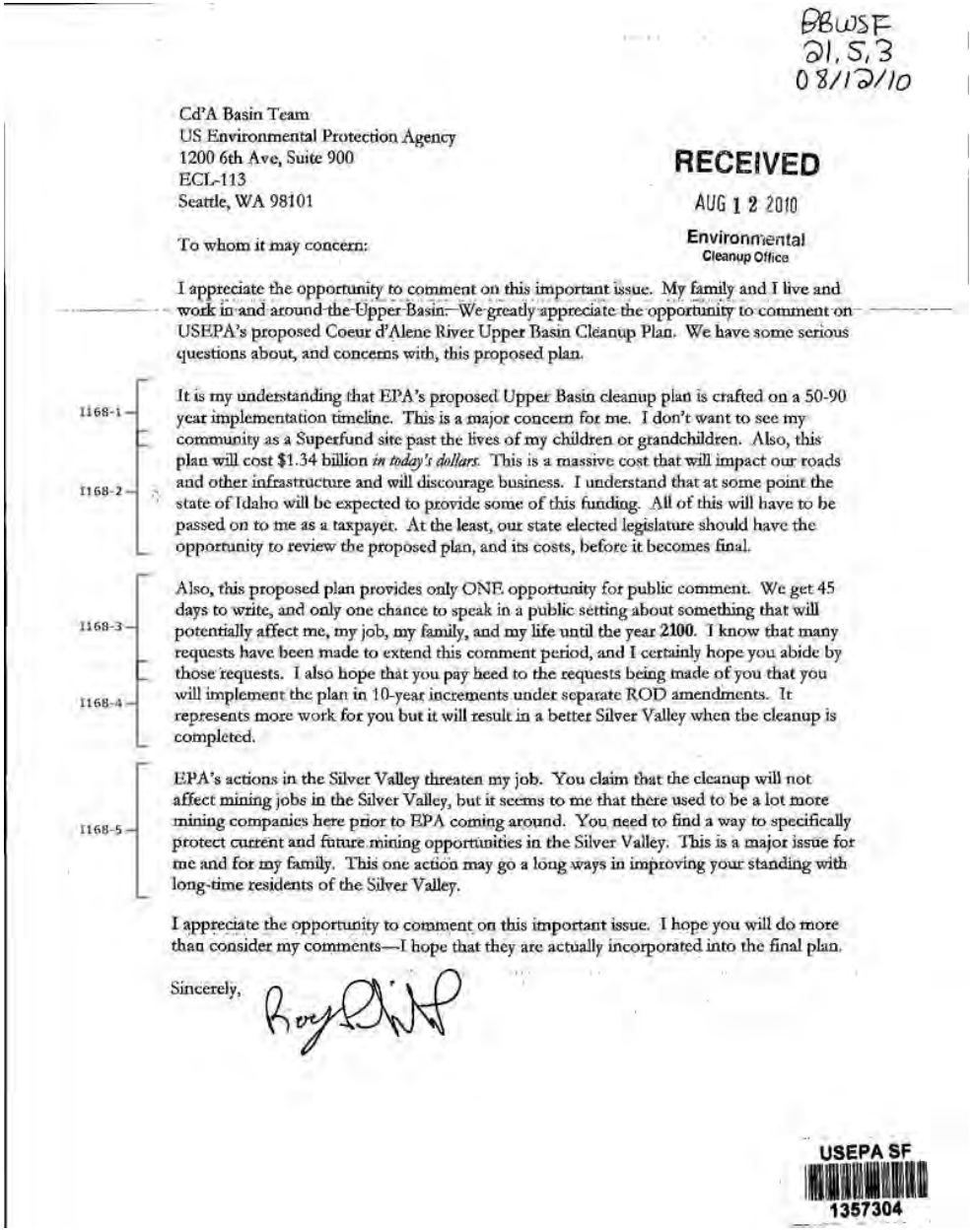
Response to comment I157-5
See response to Comment No. I25-5.

Response to comment I157-6
See response to Comment No. I25-6.

Response to comment I157-7
See response to Comment No. I25-7.

Response to comment I157-8
See response to Comment No. I25-8.

Unknown, Unknown, I168, Letter 1357304



BBWSF
21, 5, 3
08/12/10

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

RECEIVED
AUG 12 2010
Environmental
Cleanup Office

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I168-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I168-2

I168-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I168-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I168-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

USEPA SF
1357304

Response to comment I168-1
See response to Comment No. I58-1.

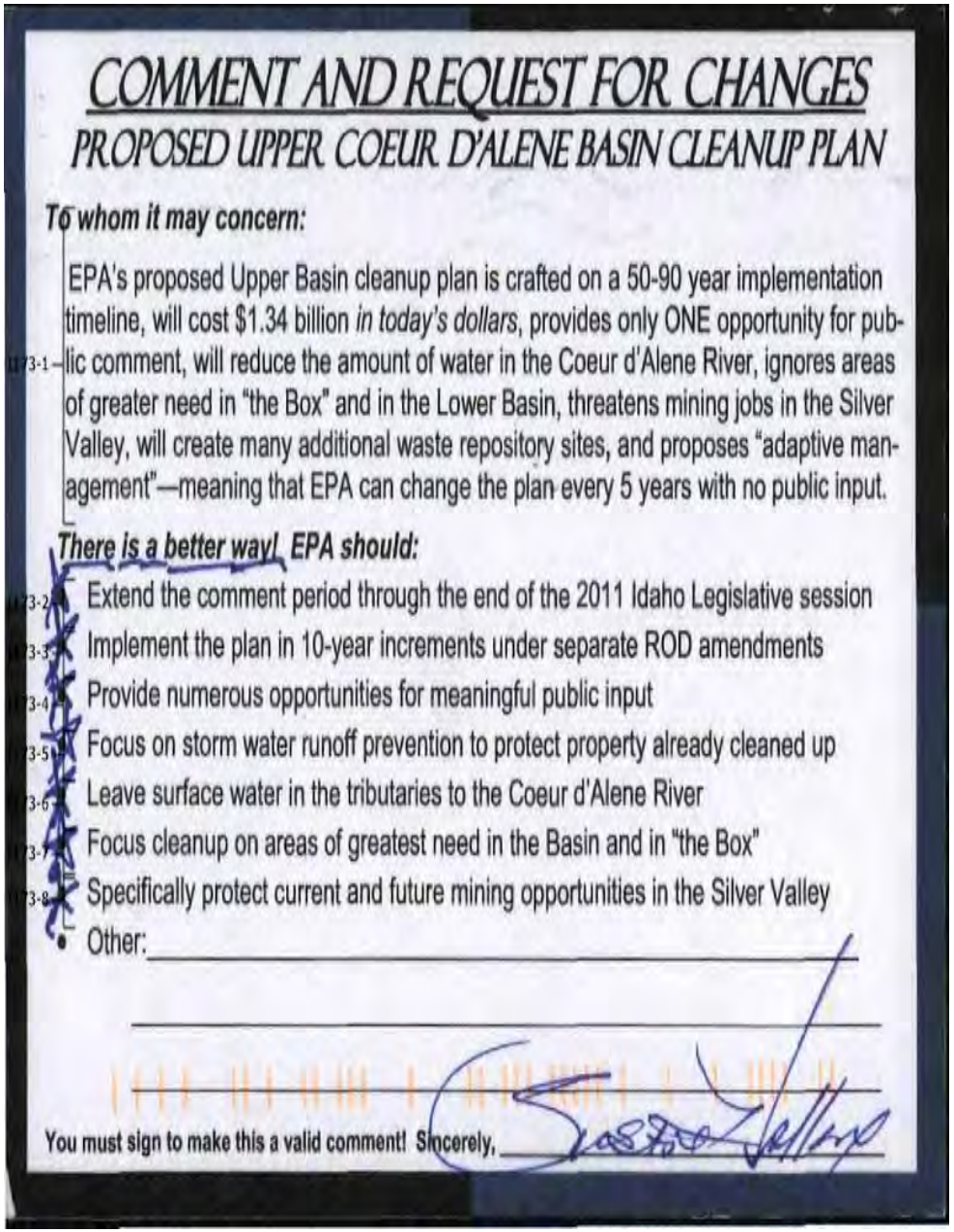
Response to comment I168-2
See response to Comment No. I58-2.

Response to comment I168-3
See response to Comment No. I58-3.

Response to comment I168-4
See response to Comment No. I58-4.

Response to comment I168-5
See response to Comment No. I58-5.

Unknown, Unknown, I173, Letter 1357366



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I173-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I173-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I173-3 Implement the plan in 10-year increments under separate ROD amendments
- I173-4 Provide numerous opportunities for meaningful public input
- I173-5 Focus on storm water runoff prevention to protect property already cleaned up
- I173-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I173-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I173-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I173-1
See response to Comment No. I25-1.

Response to comment I173-2
See response to Comment No. I25-2.

Response to comment I173-3
See response to Comment No. I25-3.

Response to comment I173-4
See response to Comment No. I25-4.

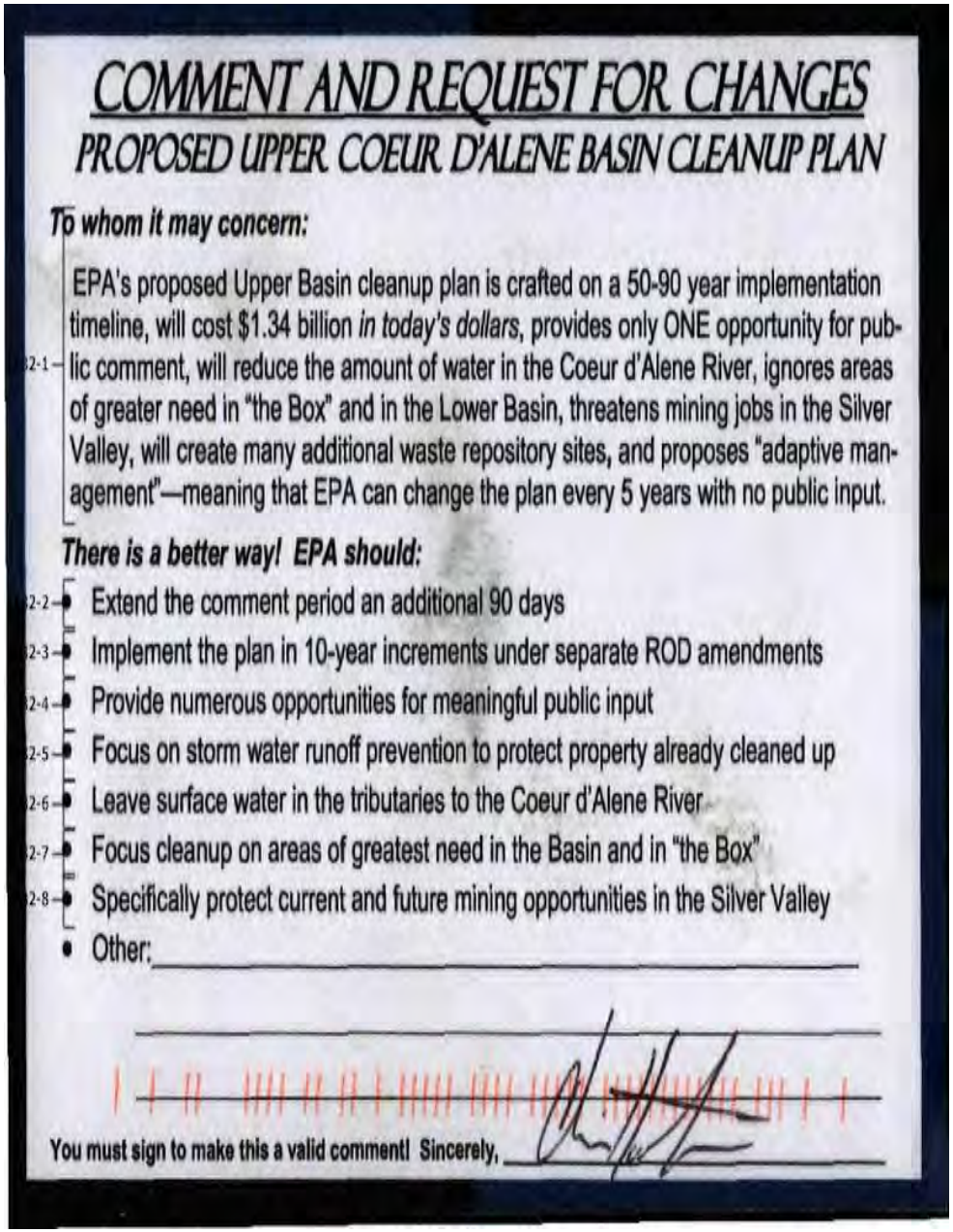
Response to comment I173-5
See response to Comment No. I25-5.

Response to comment I173-6
See response to Comment No. I25-6.

Response to comment I173-7
See response to Comment No. I25-7.

Response to comment I173-8
See response to Comment No. I25-8.

Unknown, Unknown, I182, Letter 1357405



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I182-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I182-2 Extend the comment period an additional 90 days
- I182-3 Implement the plan in 10-year increments under separate ROD amendments
- I182-4 Provide numerous opportunities for meaningful public input
- I182-5 Focus on storm water runoff prevention to protect property already cleaned up
- I182-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I182-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I182-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I182-1
See response to Comment No. I25-1.

Response to comment I182-2
See response to Comment No. I25-2.

Response to comment I182-3
See response to Comment No. I25-3.

Response to comment I182-4
See response to Comment No. I25-4.

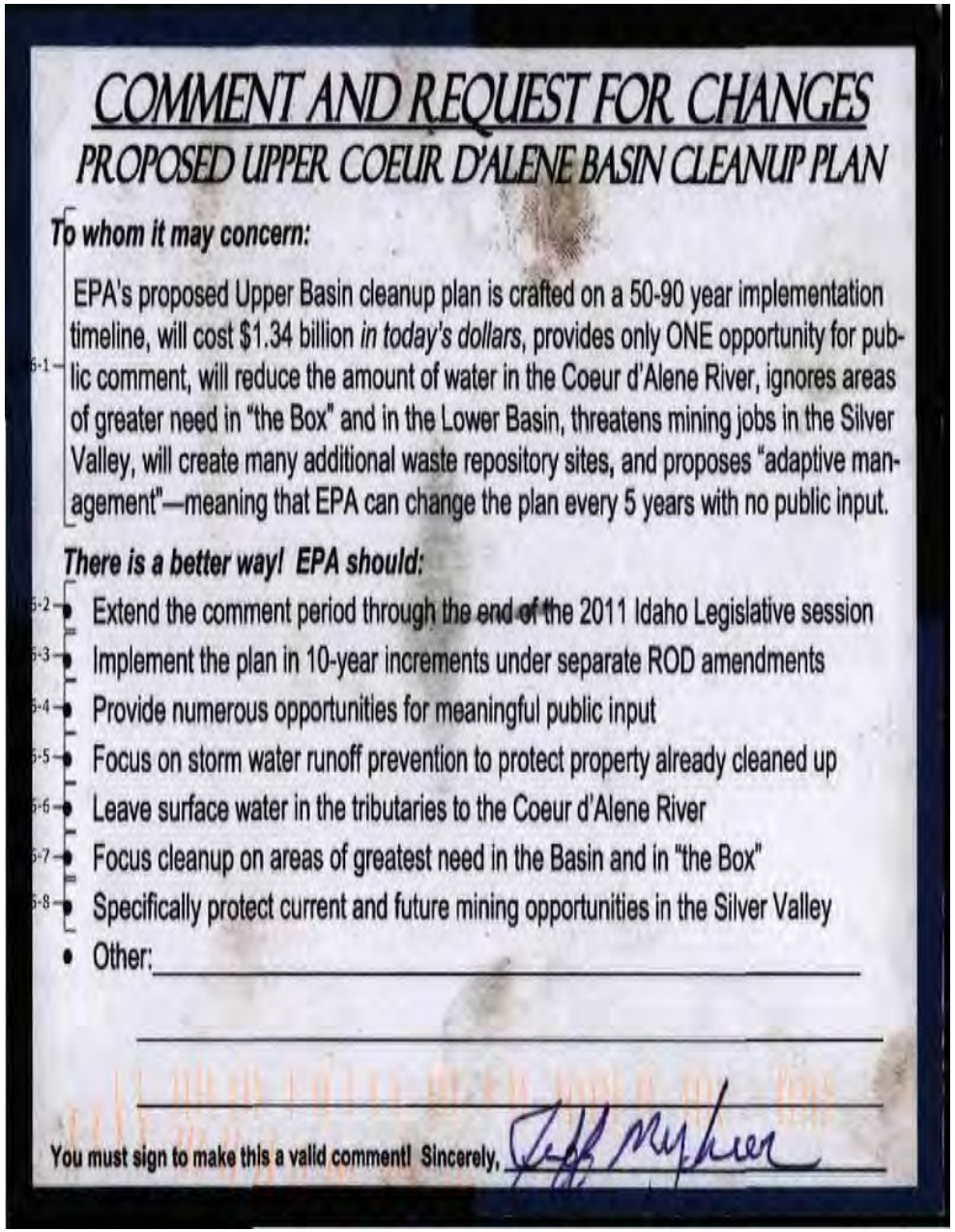
Response to comment I182-5
See response to Comment No. I25-5.

Response to comment I182-6
See response to Comment No. I25-6.

Response to comment I182-7
See response to Comment No. I25-7.

Response to comment I182-8
See response to Comment No. I25-8.

Unknown, Unknown, I186, Letter 1357498



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I186-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I186-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I186-3 Implement the plan in 10-year increments under separate ROD amendments
- I186-4 Provide numerous opportunities for meaningful public input
- I186-5 Focus on storm water runoff prevention to protect property already cleaned up
- I186-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I186-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I186-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, [signature]

Response to comment I186-1
See response to Comment No. I25-1.

Response to comment I186-2
See response to Comment No. I25-2.

Response to comment I186-3
See response to Comment No. I25-3.

Response to comment I186-4
See response to Comment No. I25-4.

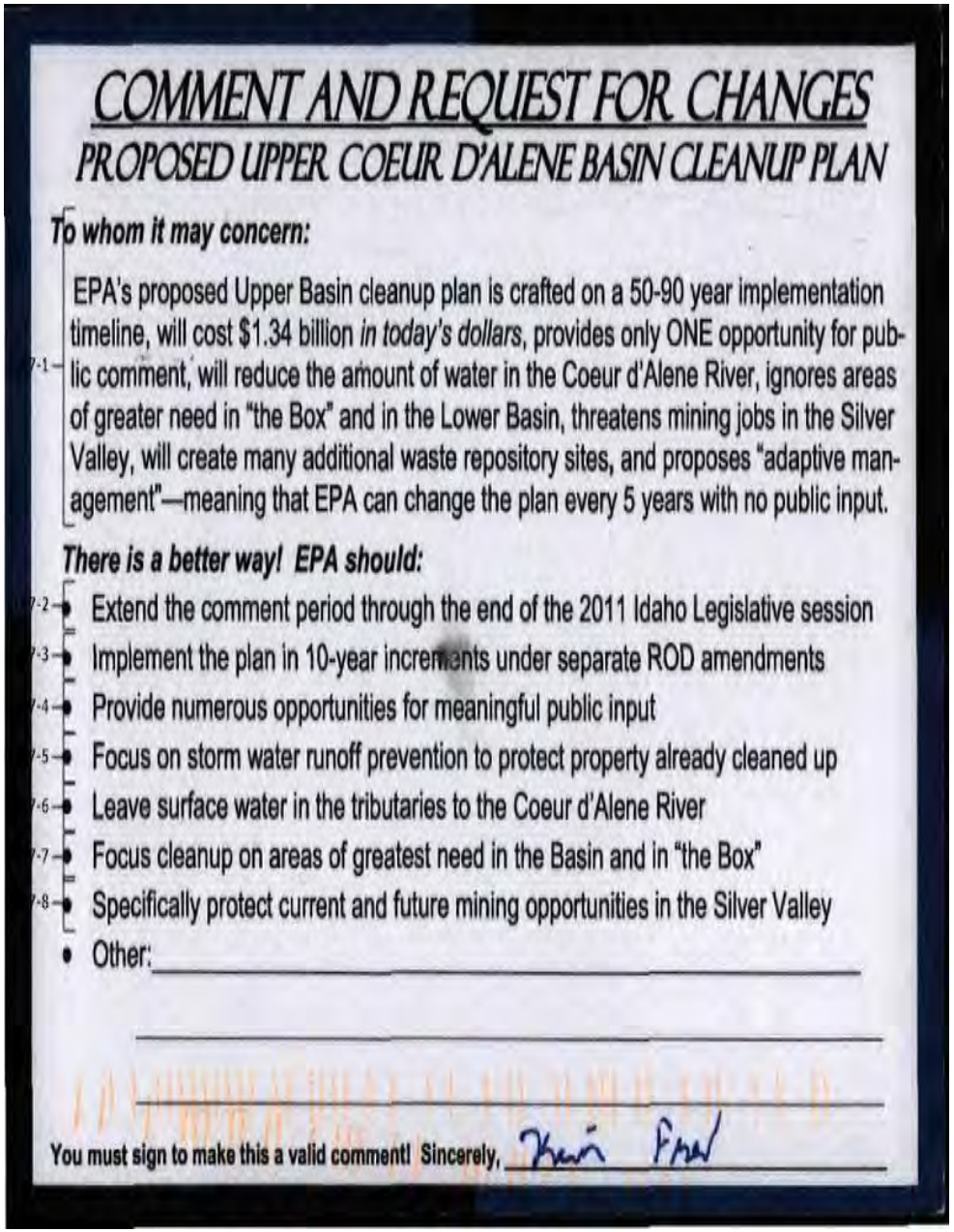
Response to comment I186-5
See response to Comment No. I25-5.

Response to comment I186-6
See response to Comment No. I25-6.

Response to comment I186-7
See response to Comment No. I25-7.

Response to comment I186-8
See response to Comment No. I25-8.

Unknown, Unknown, I187, Letter 1357499



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I187-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I187-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I187-3 Implement the plan in 10-year increments under separate ROD amendments
- I187-4 Provide numerous opportunities for meaningful public input
- I187-5 Focus on storm water runoff prevention to protect property already cleaned up
- I187-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I187-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I187-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Kevin Fred

Response to comment I187-1
See response to Comment No. I25-1.

Response to comment I187-2
See response to Comment No. I25-2.

Response to comment I187-3
See response to Comment No. I25-3.

Response to comment I187-4
See response to Comment No. I25-4.

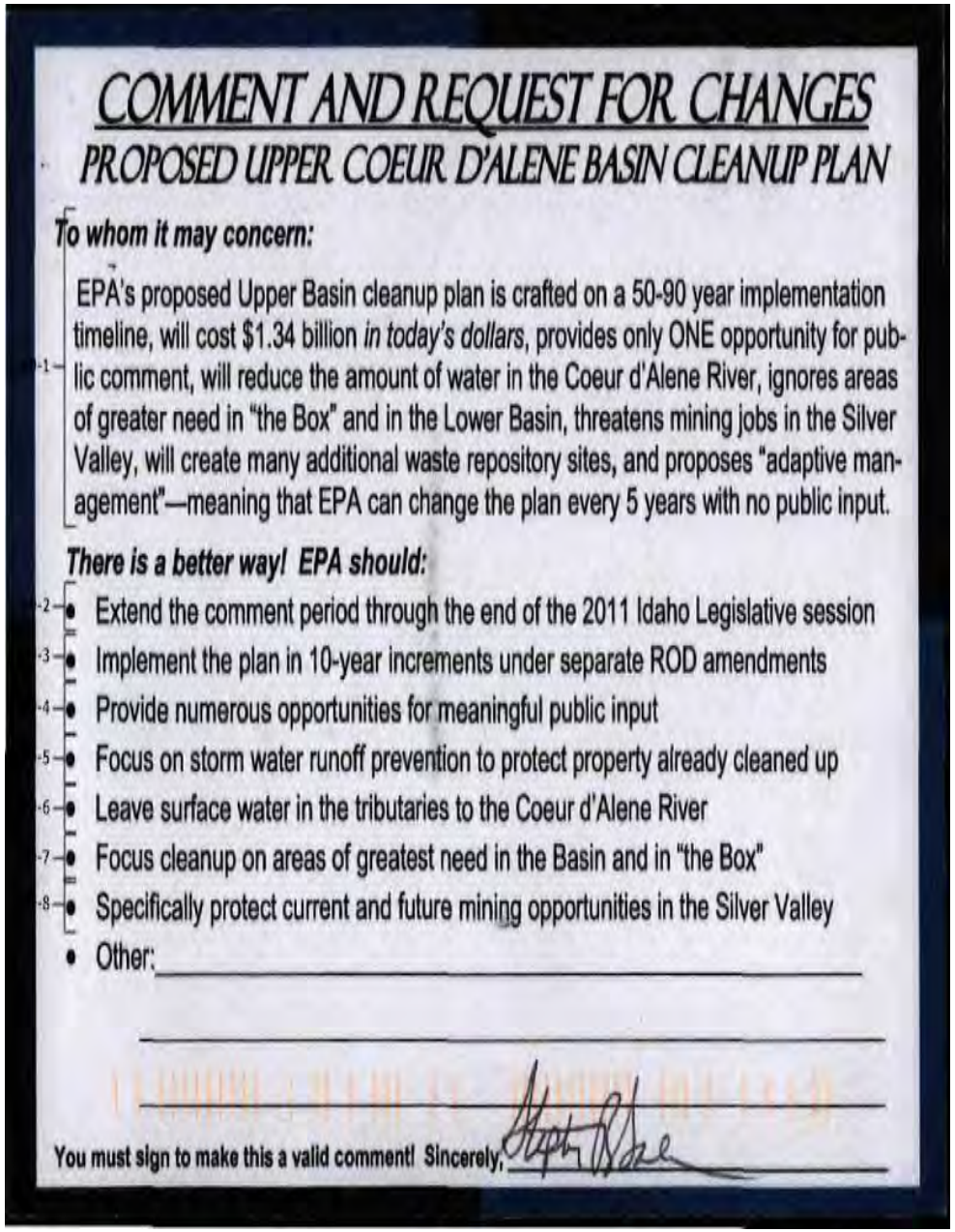
Response to comment I187-5
See response to Comment No. I25-5.

Response to comment I187-6
See response to Comment No. I25-6.

Response to comment I187-7
See response to Comment No. I25-7.

Response to comment I187-8
See response to Comment No. I25-8.

Unknown, Unknown, I189, Letter 1357501



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I189-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I189-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I189-3 Implement the plan in 10-year increments under separate ROD amendments
- I189-4 Provide numerous opportunities for meaningful public input
- I189-5 Focus on storm water runoff prevention to protect property already cleaned up
- I189-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I189-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I189-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I189-1
See response to Comment No. I25-1.

Response to comment I189-2
See response to Comment No. I25-2.

Response to comment I189-3
See response to Comment No. I25-3.

Response to comment I189-4
See response to Comment No. I25-4.

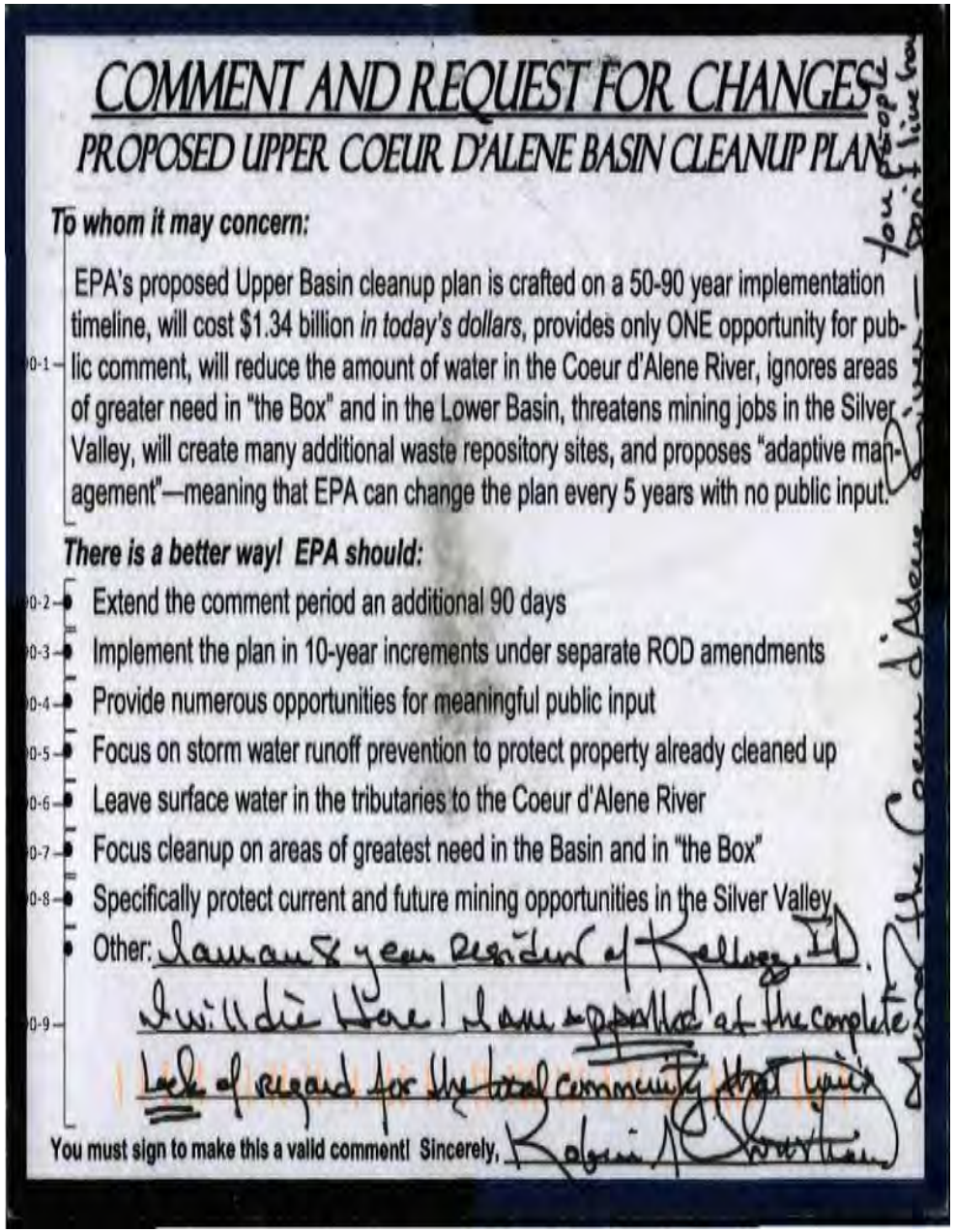
Response to comment I189-5
See response to Comment No. I25-5.

Response to comment I189-6
See response to Comment No. I25-6.

Response to comment I189-7
See response to Comment No. I25-7.

Response to comment I189-8
See response to Comment No. I25-8.

Unknown, Unknown, I190, Letter 1357502



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I190-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I190-2 Extend the comment period an additional 90 days
- I190-3 Implement the plan in 10-year increments under separate ROD amendments
- I190-4 Provide numerous opportunities for meaningful public input
- I190-5 Focus on storm water runoff prevention to protect property already cleaned up
- I190-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I190-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I190-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: I am a 8 year resident of Kellogg, ID. I will die here! I am appalled at the complete I190-9 lack of regard for the local community that lives

You must sign to make this a valid comment! Sincerely,

Response to comment I190-1
See response to Comment No. I25-1.

Response to comment I190-2
See response to Comment No. I25-2.

Response to comment I190-3
See response to Comment No. I25-3.

Response to comment I190-4
See response to Comment No. I25-4.

Response to comment I190-5
See response to Comment No. I25-5.

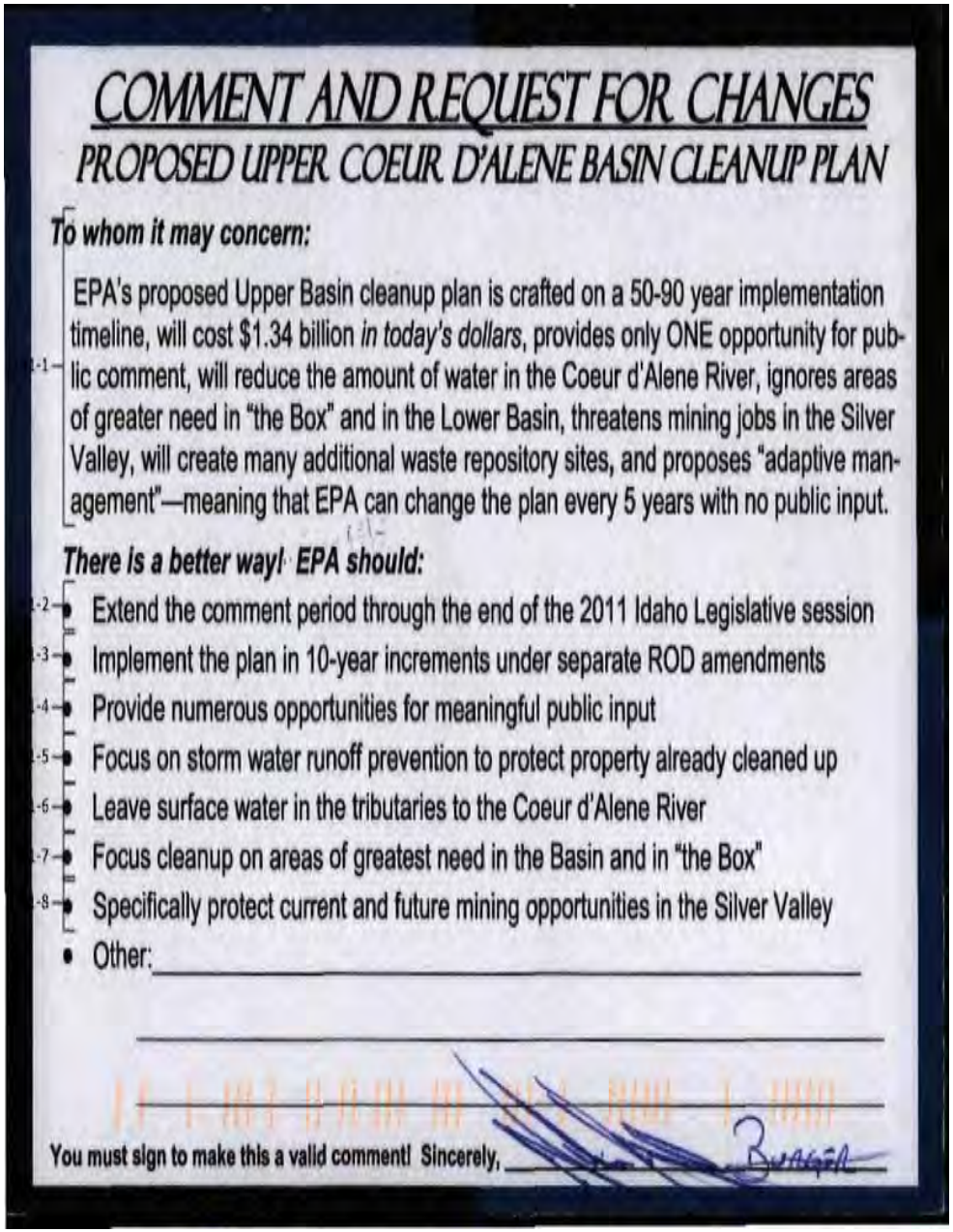
Response to comment I190-6
See response to Comment No. I25-6.

Response to comment I190-7
See response to Comment No. I25-7.

Response to comment I190-8
See response to Comment No. I25-8.

Response to comment I190-9
See responses to Comment Nos. I295-1 and I295-2.

Unknown, Unknown, I191 Letter 1357503



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I191-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I191-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I191-3 Implement the plan in 10-year increments under separate ROD amendments
- I191-4 Provide numerous opportunities for meaningful public input
- I191-5 Focus on storm water runoff prevention to protect property already cleaned up
- I191-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I191-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I191-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I191-1
See response to Comment No. I25-1.

Response to comment I191-2
See response to Comment No. I25-2.

Response to comment I191-3
See response to Comment No. I25-3.

Response to comment I191-4
See response to Comment No. I25-4.

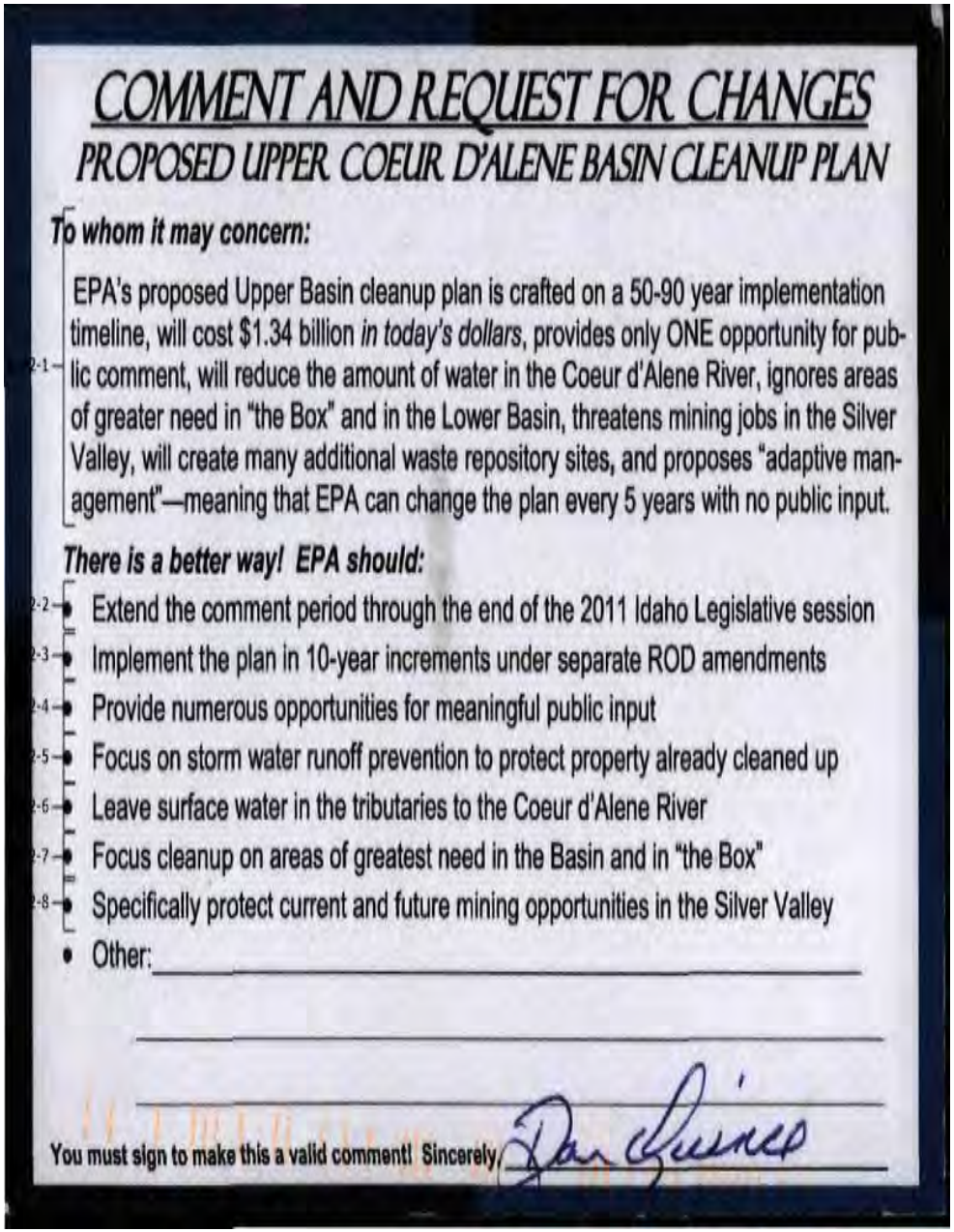
Response to comment I191-5
See response to Comment No. I25-5.

Response to comment I191-6
See response to Comment No. I25-6.

Response to comment I191-7
See response to Comment No. I25-7.

Response to comment I191-8
See response to Comment No. I25-8.

Unknown, Unknown, I192, Letter 1357504



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I192-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I192-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I192-3 Implement the plan in 10-year increments under separate ROD amendments
- I192-4 Provide numerous opportunities for meaningful public input
- I192-5 Focus on storm water runoff prevention to protect property already cleaned up
- I192-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I192-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I192-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, Dan Quinn

Response to comment I192-1
See response to Comment No. I25-1.

Response to comment I192-2
See response to Comment No. I25-2.

Response to comment I192-3
See response to Comment No. I25-3.

Response to comment I192-4
See response to Comment No. I25-4.

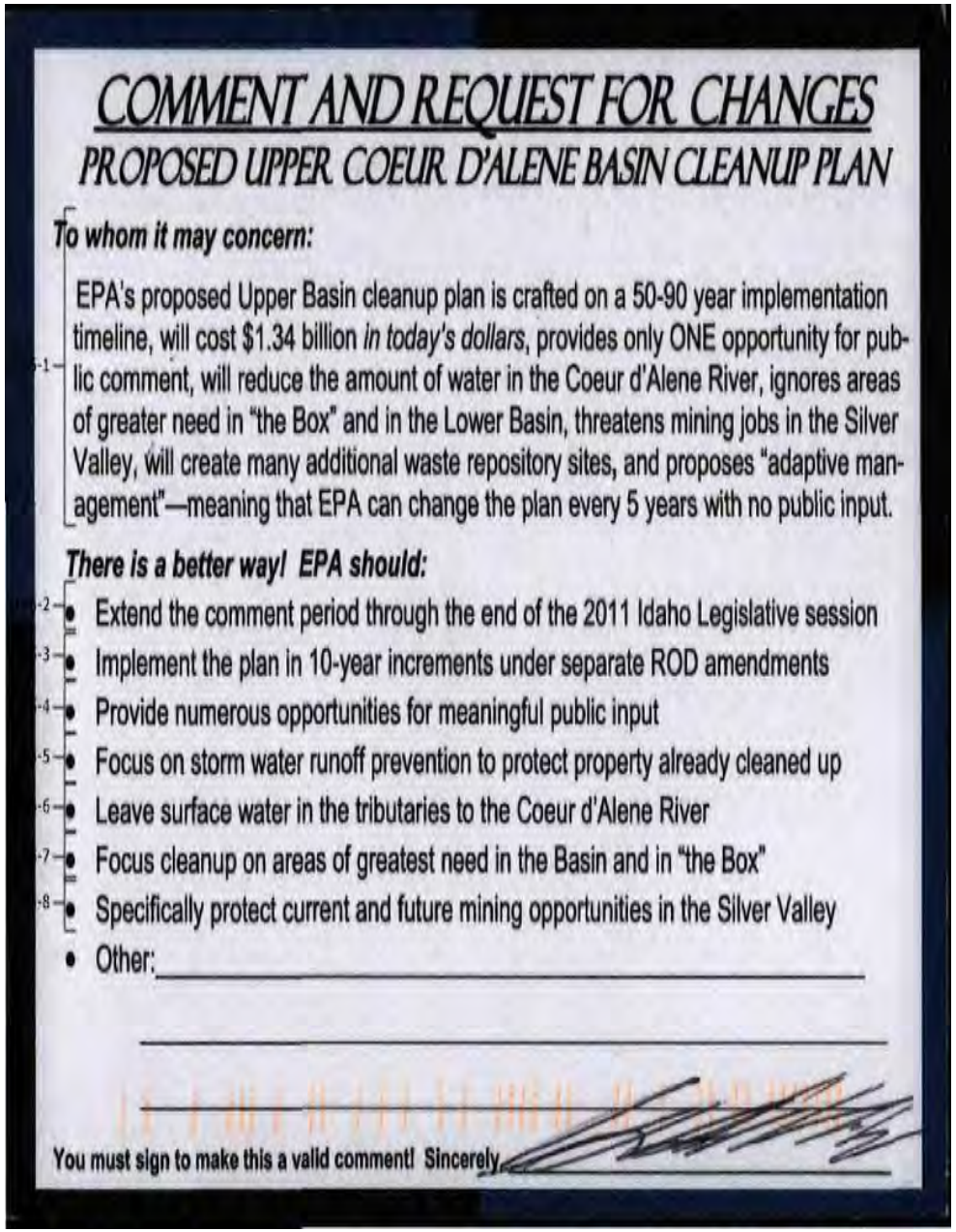
Response to comment I192-5
See response to Comment No. I25-5.

Response to comment I192-6
See response to Comment No. I25-6.

Response to comment I192-7
See response to Comment No. I25-7.

Response to comment I192-8
See response to Comment No. I25-8.

Unknown, Unknown, I195, Letter 1357507



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

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- I-3 Implement the plan in 10-year increments under separate ROD amendments
- I-4 Provide numerous opportunities for meaningful public input
- I-5 Focus on storm water runoff prevention to protect property already cleaned up
- I-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely,

Response to comment I195-1
See response to Comment No. I25-1.

Response to comment I195-2
See response to Comment No. I25-2.

Response to comment I195-3
See response to Comment No. I25-3.

Response to comment I195-4
See response to Comment No. I25-4.

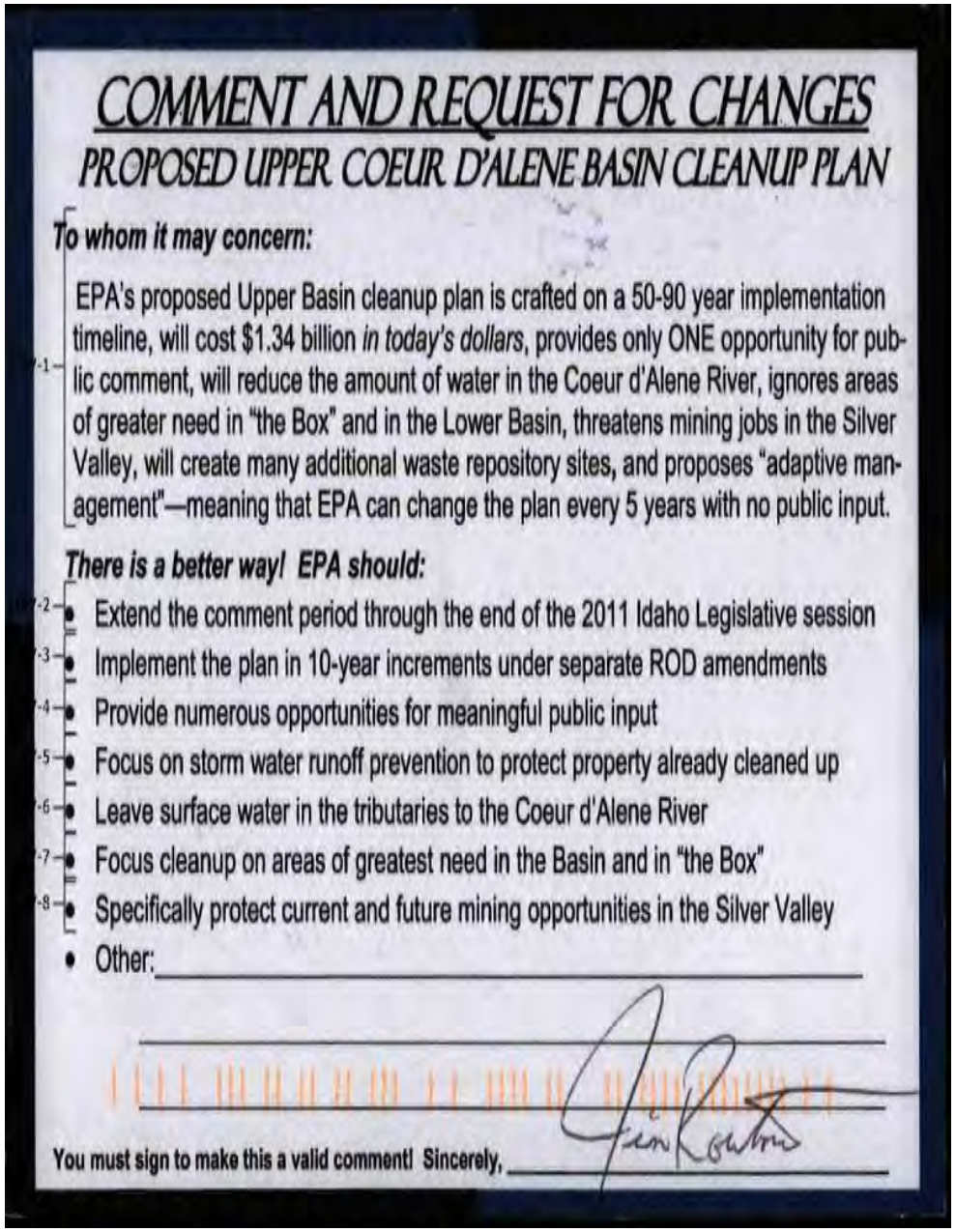
Response to comment I195-5
See response to Comment No. I25-5.

Response to comment I195-6
See response to Comment No. I25-6.

Response to comment I195-7
See response to Comment No. I25-7.

Response to comment I195-8
See response to Comment No. I25-8.

Unknown, Unknown, I197, Letter 1357509



COMMENT AND REQUEST FOR CHANGES

PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I-2 Extend the comment period through the end of the 2011 Idaho Legislative session
- I-3 Implement the plan in 10-year increments under separate ROD amendments
- I-4 Provide numerous opportunities for meaningful public input
- I-5 Focus on storm water runoff prevention to protect property already cleaned up
- I-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

You must sign to make this a valid comment! Sincerely, _____

Response to comment I197-1
See response to Comment No. I25-1.

Response to comment I197-2
See response to Comment No. I25-2.

Response to comment I197-3
See response to Comment No. I25-3.

Response to comment I197-4
See response to Comment No. I25-4.

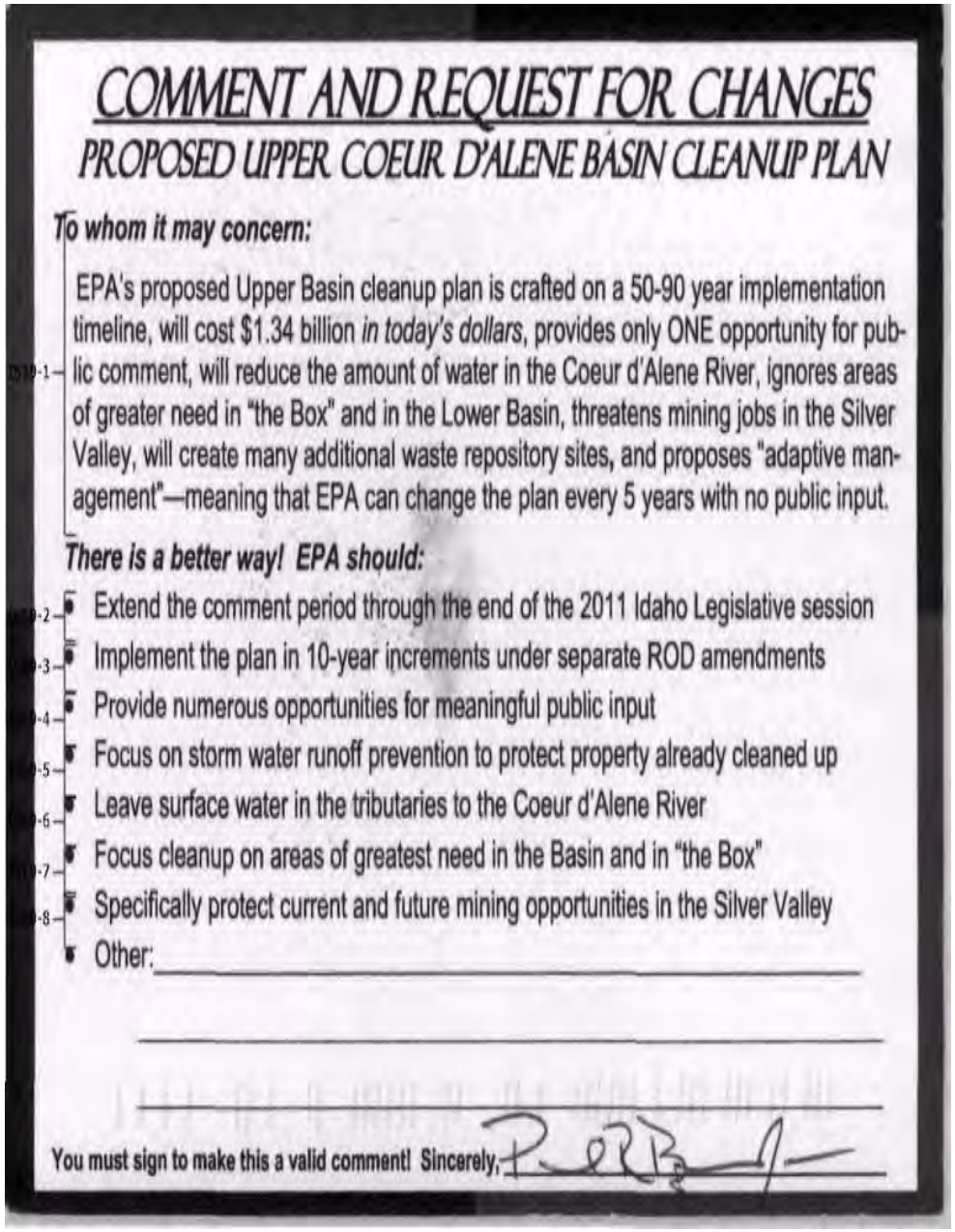
Response to comment I197-5
See response to Comment No. I25-5.

Response to comment I197-6
See response to Comment No. I25-6.

Response to comment I197-7
See response to Comment No. I25-7.

Response to comment I197-8
See response to Comment No. I25-8.

Unknown, Unknown, I519, Letter 1357641



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I519-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

I519-2 ☐ Extend the comment period through the end of the 2011 Idaho Legislative session
I519-3 ☐ Implement the plan in 10-year increments under separate ROD amendments
I519-4 ☐ Provide numerous opportunities for meaningful public input
I519-5 ☐ Focus on storm water runoff prevention to protect property already cleaned up
I519-6 ☐ Leave surface water in the tributaries to the Coeur d'Alene River
I519-7 ☐ Focus cleanup on areas of greatest need in the Basin and in "the Box"
I519-8 ☐ Specifically protect current and future mining opportunities in the Silver Valley
☐ Other: _____

You must sign to make this a valid comment! Sincerely,

Response to comment I519-1
See response to Comment No. I25-1.

Response to comment I519-2
See response to Comment No. I25-2.

Response to comment I519-3
See response to Comment No. I25-3.

Response to comment I519-4
See response to Comment No. I25-4.

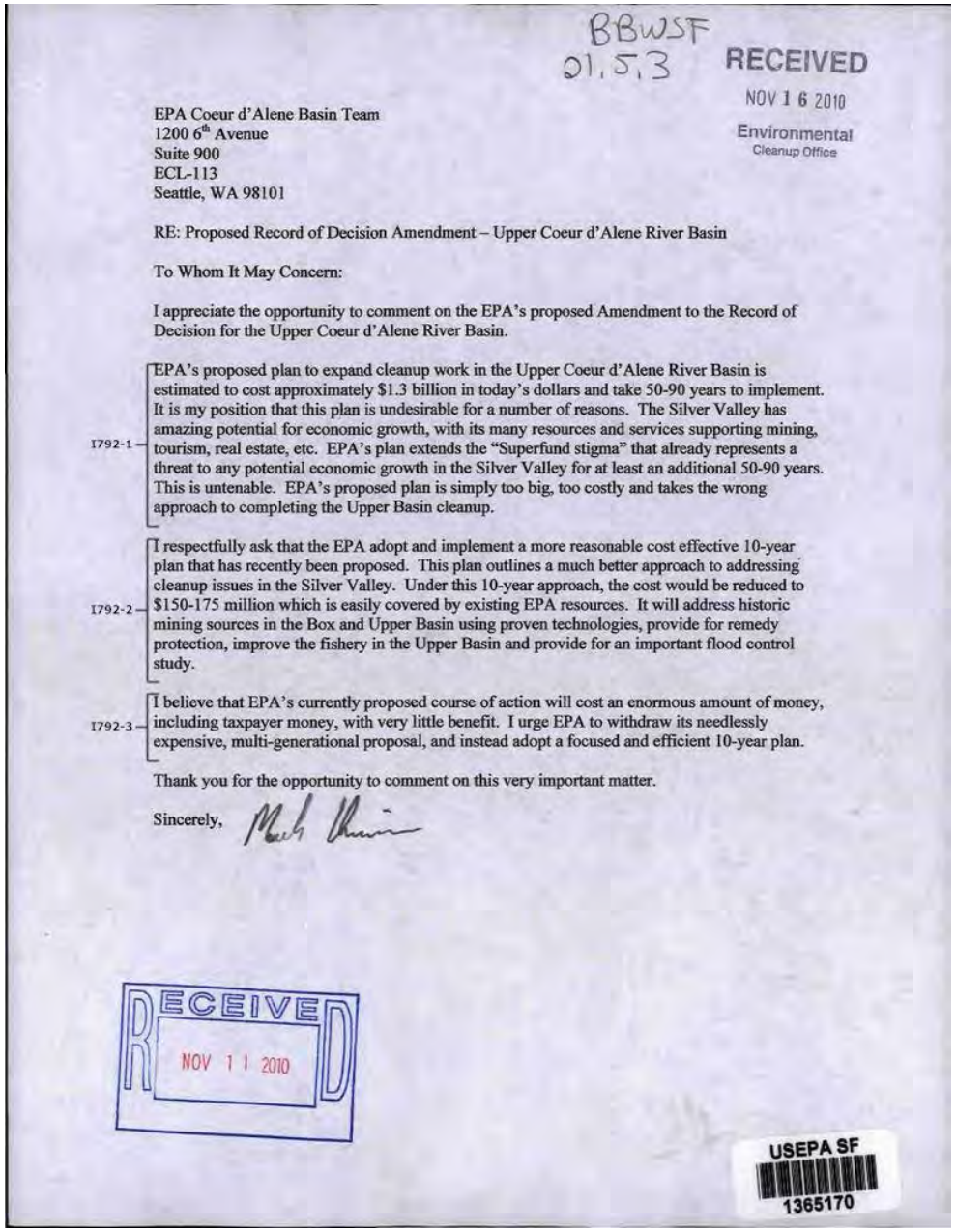
Response to comment I519-5
See response to Comment No. I25-5.

Response to comment I519-6
See response to Comment No. I25-6.

Response to comment I519-7
See response to Comment No. I25-7.

Response to comment I519-8
See response to Comment No. I25-8.

Unknown, Unknown, I792, Letter 1365170



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01.5.3

RECEIVED
NOV 16 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I792-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I792-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I792-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

RECEIVED
NOV 11 2010

USEPA SF
1365170

Response to comment I792-1

See response to Comment No. I474-1.

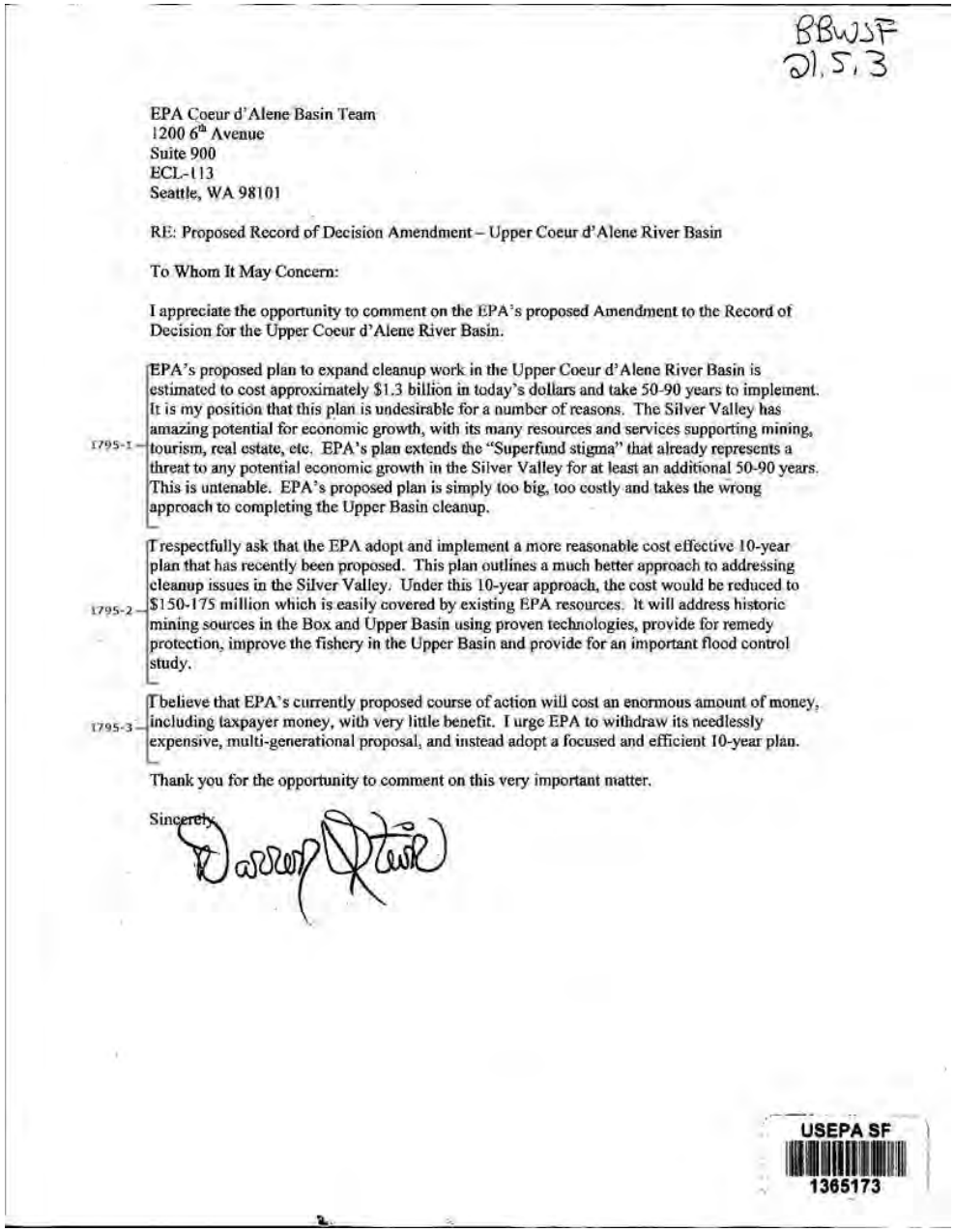
Response to comment I792-2

See response to Comment No. I474-2.

Response to comment I792-3

See response to Comment No. I474-3.

Unknown, Unknown, I795, Letter 1365173



BBWSF
21.5.3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I795-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I795-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I795-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

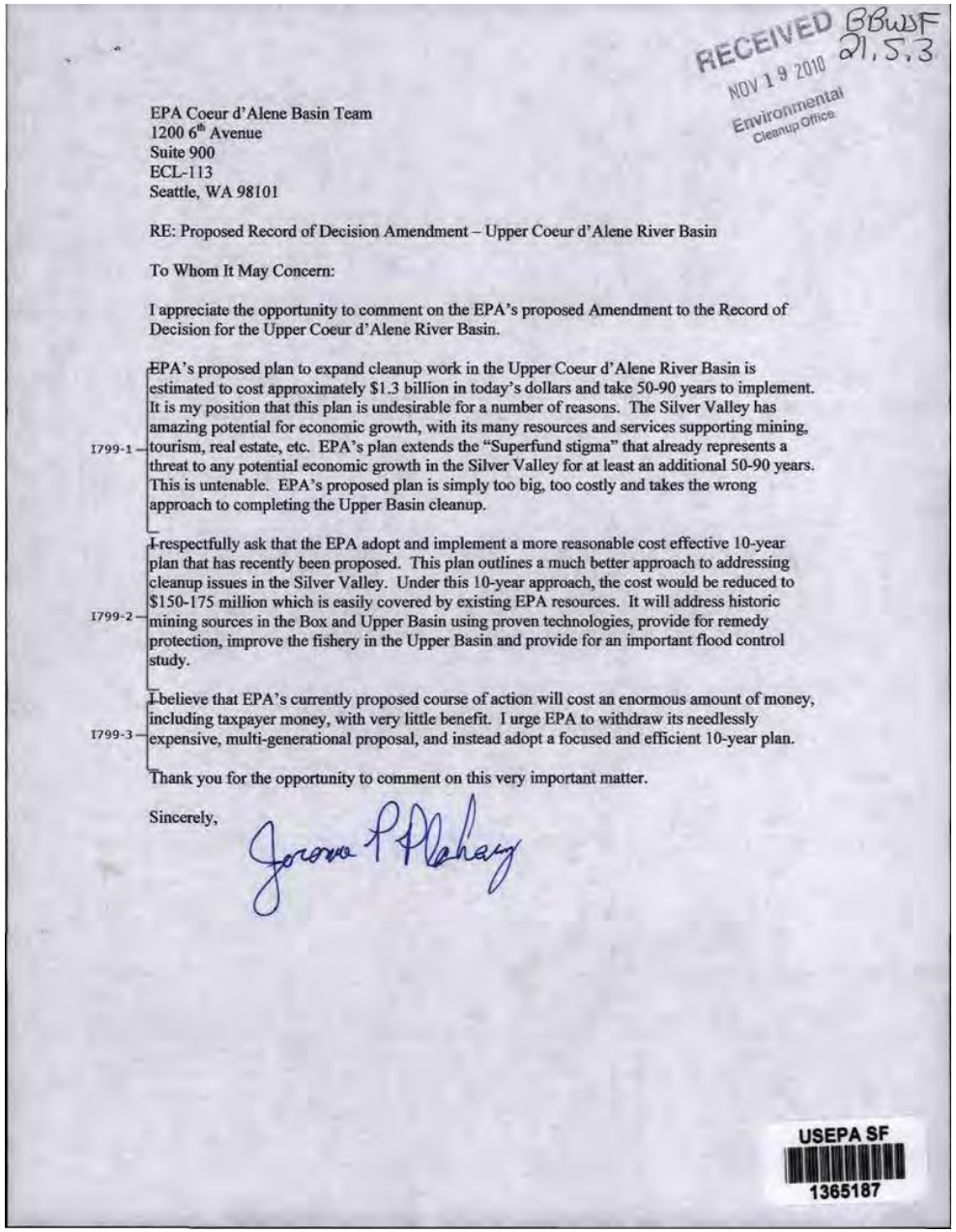
USEPA SF
1365173

Response to comment I795-1
See response to Comment No. I474-1.

Response to comment I795-2
See response to Comment No. I474-2.

Response to comment I795-3
See response to Comment No. I474-3.

Unknown, Unknown, I799, Letter 1365187



RECEIVED BBWSF 21.5.3
NOV 19 2010
Environmental Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I799-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I799-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I799-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Jerome P Mahary

USEPA SF
1365187

Response to comment I799-1
See response to Comment No. I474-1.

Response to comment I799-2
See response to Comment No. I474-2.

Response to comment I799-3
See response to Comment No. I474-3.

Valentine, Tom, I430, Letter 616334

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
tvalentine@sunshinerefinery.com to: formsubmission 11/12/2010 07:08 AM
Sent by: Tvalentine@Sunshinerefinery.Com <tvalentine=sunshinerefinery.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Tom Valentine
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I430-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I430-2 As a Silver Valley resident with education in environmental management, I oppose the concept of structuring a clean up plan that extends beyond 10 - 20 years. Most superfund clean up plans in the past set a goal, meet those requirements and and finish the project. there is a difference between reasonable reclamation and making an entire area squeaky clean. Considering the vast scope of environmental projects this country faces, a more reasonable and strategically sized plan is appropriate for the Silver Valley. Thanks
Coeur d'Alene Basin Resident: Yes
Email Address: tvalentine@sunshinerefinery.com
Mailing Address: PO Box 283|Silverton|ID|83867|US
Phone Number:

616334

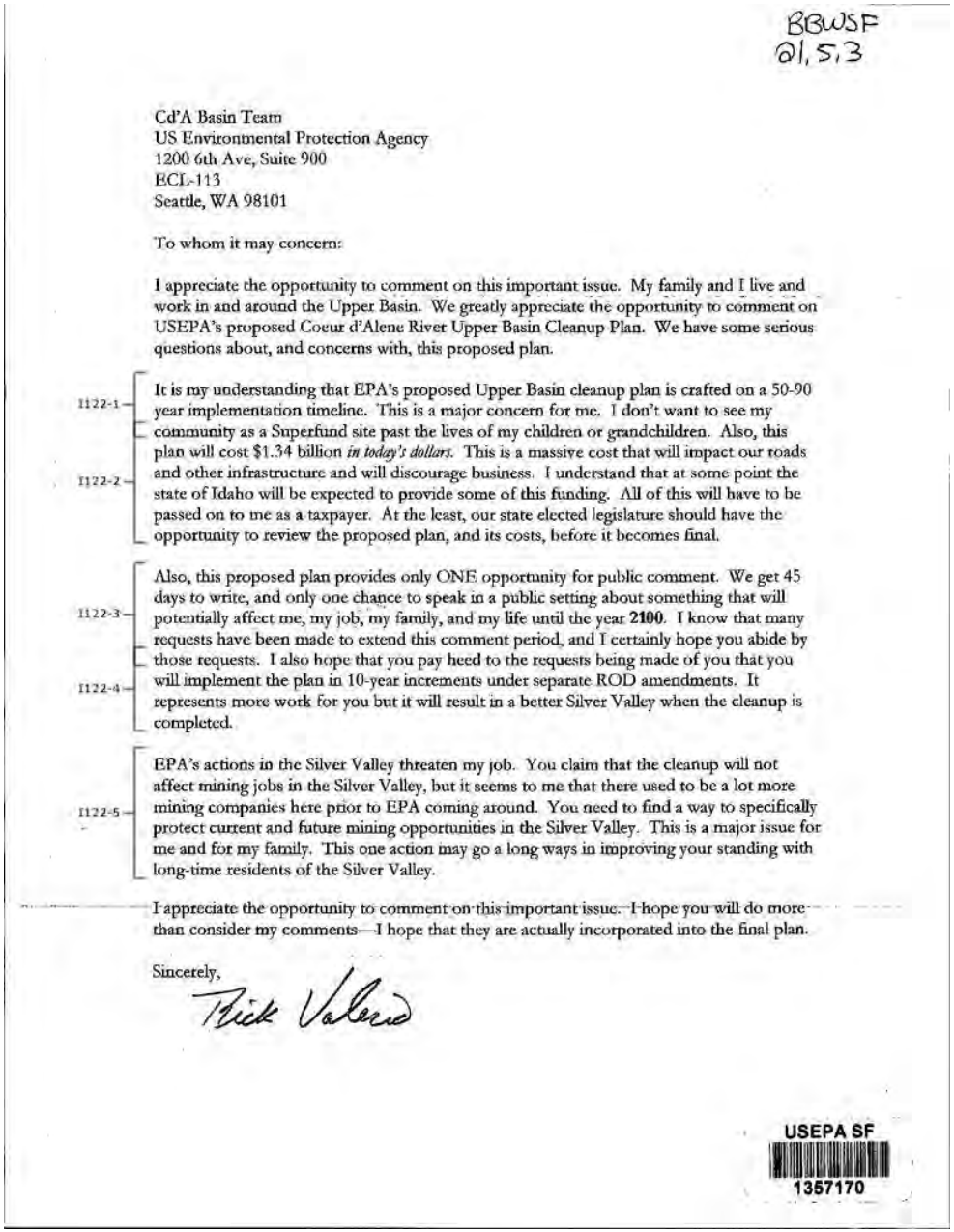
Response to comment I430-1

See response to Comment No. I351-1.

Response to comment I430-2

See response to Comment No. I58-1, and the ROD Amendment, Part 2 Section 12.3 regarding the implementation of the Selected Remedy.

Valerie, Rick, I122, Letter 1357170



BBWSF
21,5,3

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I122-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this

I122-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I122-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by

I122-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I122-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Rick Valerie

USEPA SF
1357170

Response to comment I122-1
See response to Comment No. I58-1.

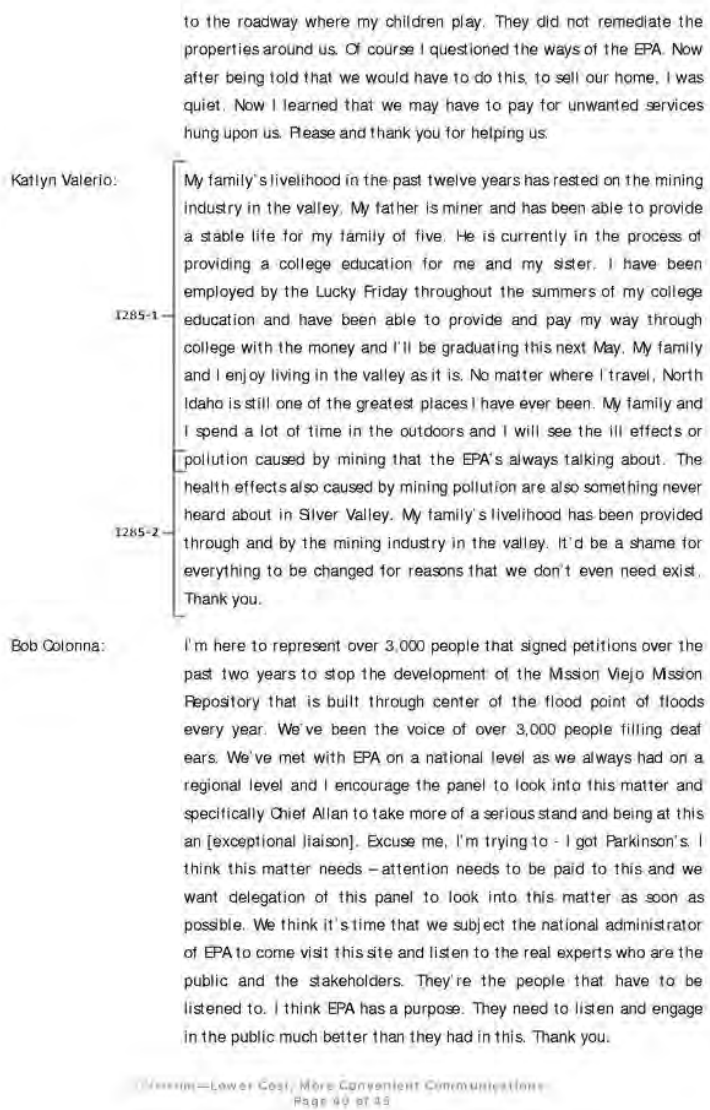
Response to comment I122-2
See response to Comment No. I58-2.

Response to comment I122-3
See response to Comment No. I58-3.

Response to comment I122-4
See response to Comment No. I58-4.

Response to comment I122-5
See response to Comment No. I58-5.

Valerio, Katlyn, I285, Letter 616015-50



to the roadway where my children play. They did not remediate the properties around us. Of course I questioned the ways of the EPA. Now after being told that we would have to do this, to sell our home, I was quiet. Now I learned that we may have to pay for unwanted services hung upon us. Please and thank you for helping us.

Katlyn Valerio:

I285-1

I285-2

My family's livelihood in the past twelve years has rested on the mining industry in the valley. My father is miner and has been able to provide a stable life for my family of five. He is currently in the process of providing a college education for me and my sister. I have been employed by the Lucky Friday throughout the summers of my college education and have been able to provide and pay my way through college with the money and I'll be graduating this next May. My family and I enjoy living in the valley as it is. No matter where I travel, North Idaho is still one of the greatest places I have ever been. My family and I spend a lot of time in the outdoors and I will see the ill effects or pollution caused by mining that the EPA's always talking about. The health effects also caused by mining pollution are also something never heard about in Silver Valley. My family's livelihood has been provided through and by the mining industry in the valley. It'd be a shame for everything to be changed for reasons that we don't even need exist. Thank you.

Bob Colonna:

I'm here to represent over 3,000 people that signed petitions over the past two years to stop the development of the Mission Viejo Mission Repository that is built through center of the flood point of floods every year. We've been the voice of over 3,000 people filling deaf ears. We've met with EPA on a national level as we always had on a regional level and I encourage the panel to look into this matter and specifically Chief Allan to take more of a serious stand and being at this an [exceptional liaison]. Excuse me, I'm trying to - I got Parkinson's. I think this matter needs – attention needs to be paid to this and we want delegation of this panel to look into this matter as soon as possible. We think it's time that we subject the national administrator of EPA to come visit this site and listen to the real experts who are the public and the stakeholders. They're the people that have to be listened to. I think EPA has a purpose. They need to listen and engage in the public much better than they had in this. Thank you.

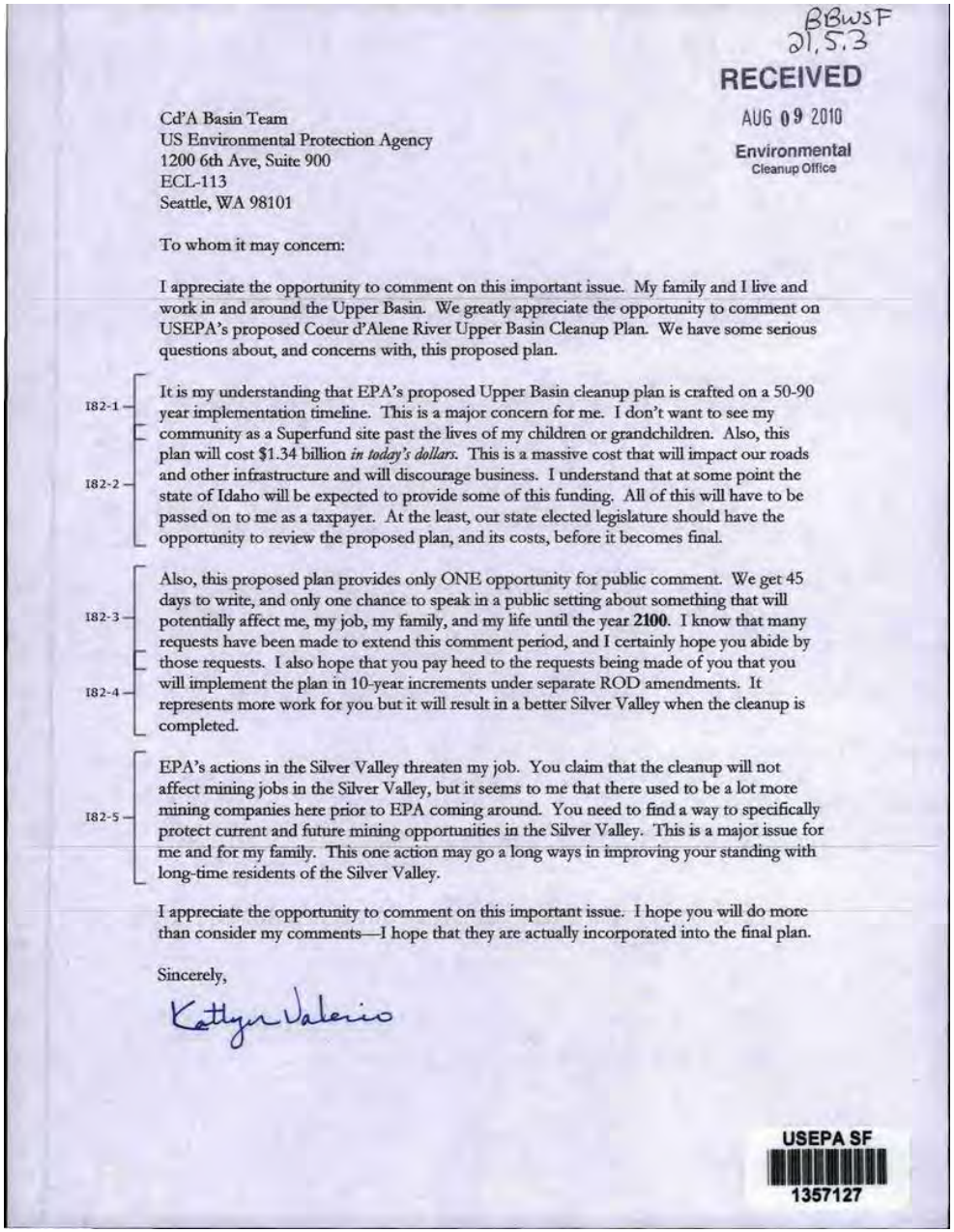
Response to comment I285-1

Thank you for your comment.

Response to comment I285-2

Regarding health effects in the Basin, see response to Comment No. I295-1. As to mining and the cleanup, see response to Comment No. I58-5.

Valerio, Katlyn, I82, Letter 1357127



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AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I82-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I82-2

I82-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I82-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I82-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Katlyn Valerio

USEPA SF
1357127

Response to comment I82-1
See response to Comment No. I58-1.

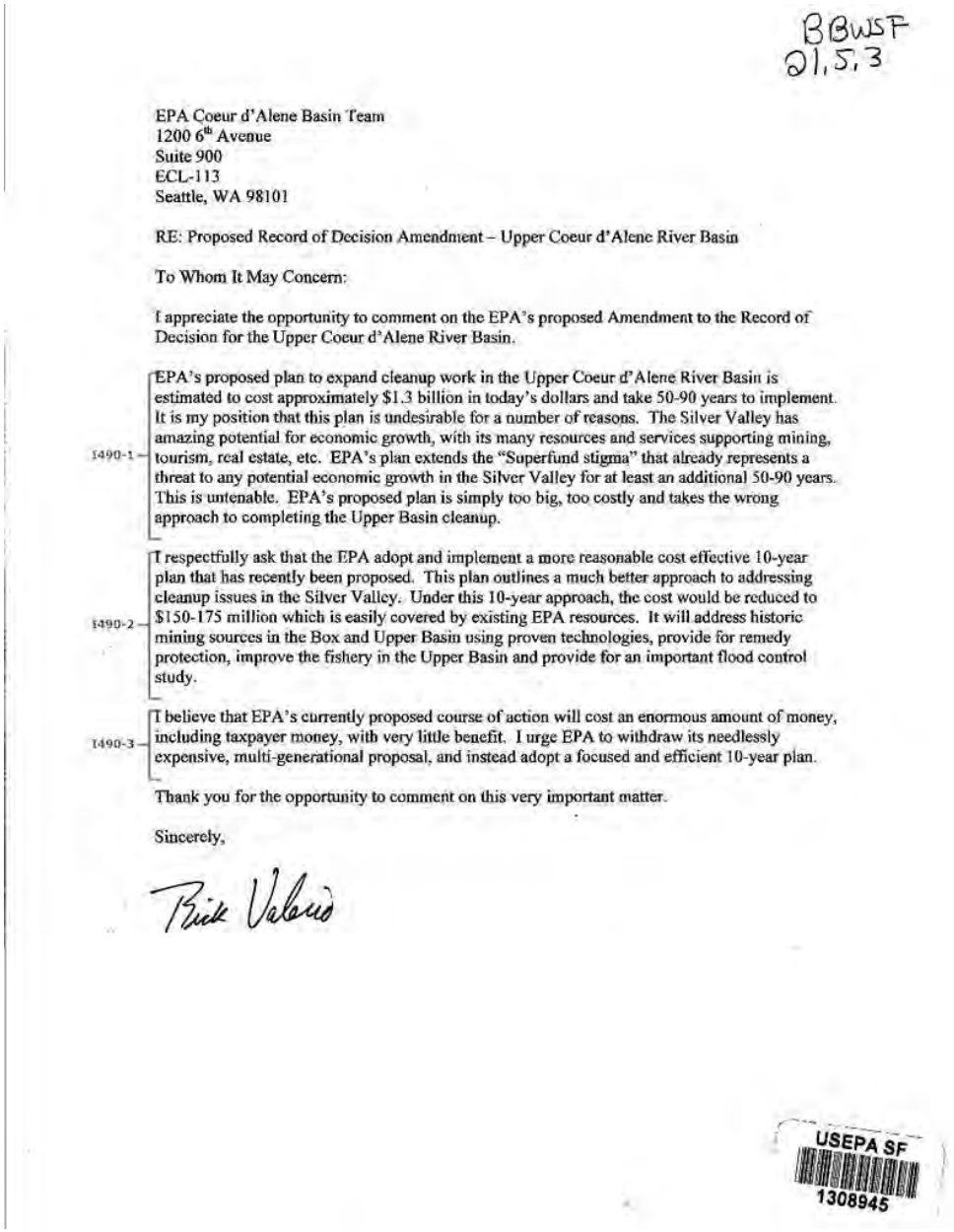
Response to comment I82-2
See response to Comment No. I58-2.

Response to comment I82-3
See response to Comment No. I58-3.

Response to comment I82-4
See response to Comment No. I58-4.

Response to comment I82-5
See response to Comment No. I58-5.

Valerio, Rick, I490, Letter 1308945



BBWSF
21,5,3

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

I appreciate the opportunity to comment on the EPA's proposed Amendment to the Record of Decision for the Upper Coeur d'Alene River Basin.

I490-1 EPA's proposed plan to expand cleanup work in the Upper Coeur d'Alene River Basin is estimated to cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. It is my position that this plan is undesirable for a number of reasons. The Silver Valley has amazing potential for economic growth, with its many resources and services supporting mining, tourism, real estate, etc. EPA's plan extends the "Superfund stigma" that already represents a threat to any potential economic growth in the Silver Valley for at least an additional 50-90 years. This is untenable. EPA's proposed plan is simply too big, too costly and takes the wrong approach to completing the Upper Basin cleanup.

I490-2 I respectfully ask that the EPA adopt and implement a more reasonable cost effective 10-year plan that has recently been proposed. This plan outlines a much better approach to addressing cleanup issues in the Silver Valley. Under this 10-year approach, the cost would be reduced to $150-175 million which is easily covered by existing EPA resources. It will address historic mining sources in the Box and Upper Basin using proven technologies, provide for remedy protection, improve the fishery in the Upper Basin and provide for an important flood control study.

I490-3 I believe that EPA's currently proposed course of action will cost an enormous amount of money, including taxpayer money, with very little benefit. I urge EPA to withdraw its needlessly expensive, multi-generational proposal, and instead adopt a focused and efficient 10-year plan.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

Rick Valerio

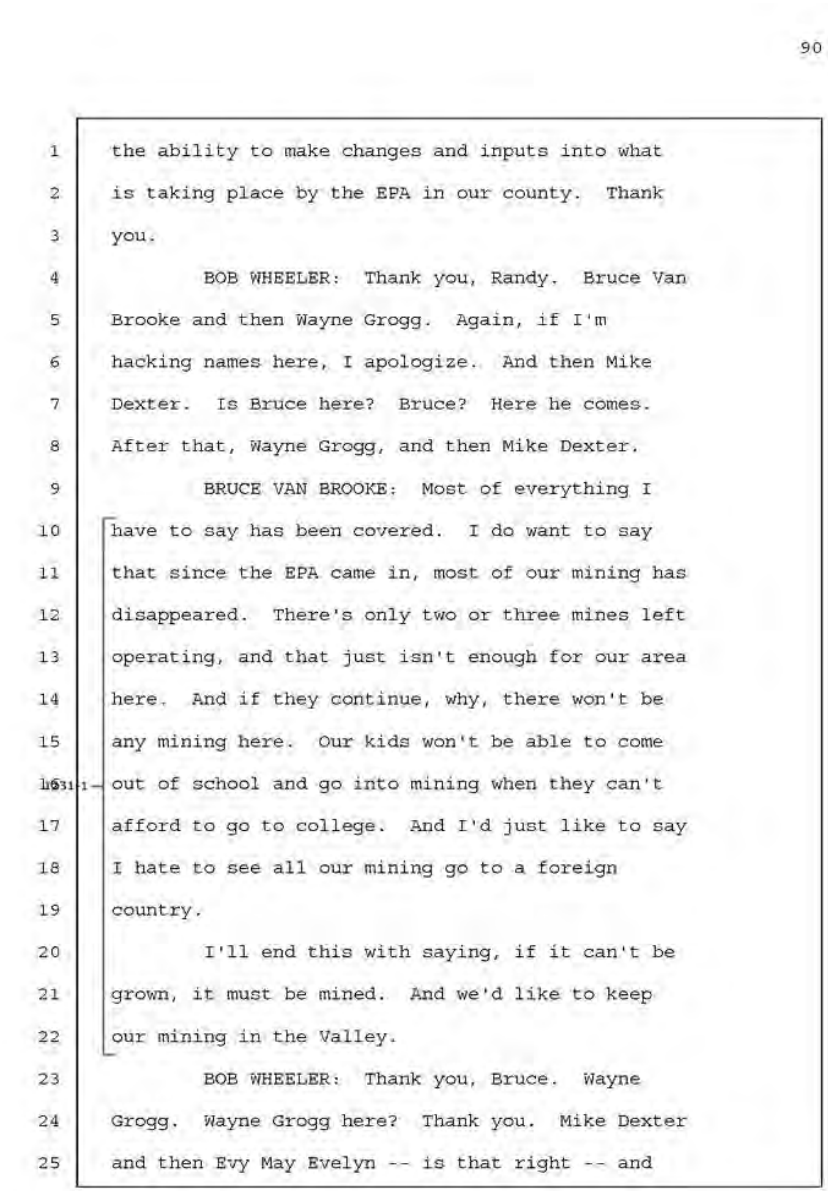
USEPA SF
1308945

Response to comment I490-1
See response to Comment No. I474-1.

Response to comment I490-2
See response to Comment No. I474-2.

Response to comment I490-3
See response to Comment No. I474-3.

Van Brooke, Bruce, I231, Letter 610097-26



90

the ability to make changes and inputs into what is taking place by the EPA in our county. Thank you.

BOB WHEELER: Thank you, Randy. Bruce Van Brooke and then Wayne Grogg. Again, if I'm hacking names here, I apologize. And then Mike Dexter. Is Bruce here? Bruce? Here he comes. After that, Wayne Grogg, and then Mike Dexter.

BRUCE VAN BROOKE: Most of everything I have to say has been covered. I do want to say that since the EPA came in, most of our mining has disappeared. There's only two or three mines left operating, and that just isn't enough for our area here. And if they continue, why, there won't be any mining here. Our kids won't be able to come out of school and go into mining when they can't afford to go to college. And I'd just like to say I hate to see all our mining go to a foreign country.

I231-1

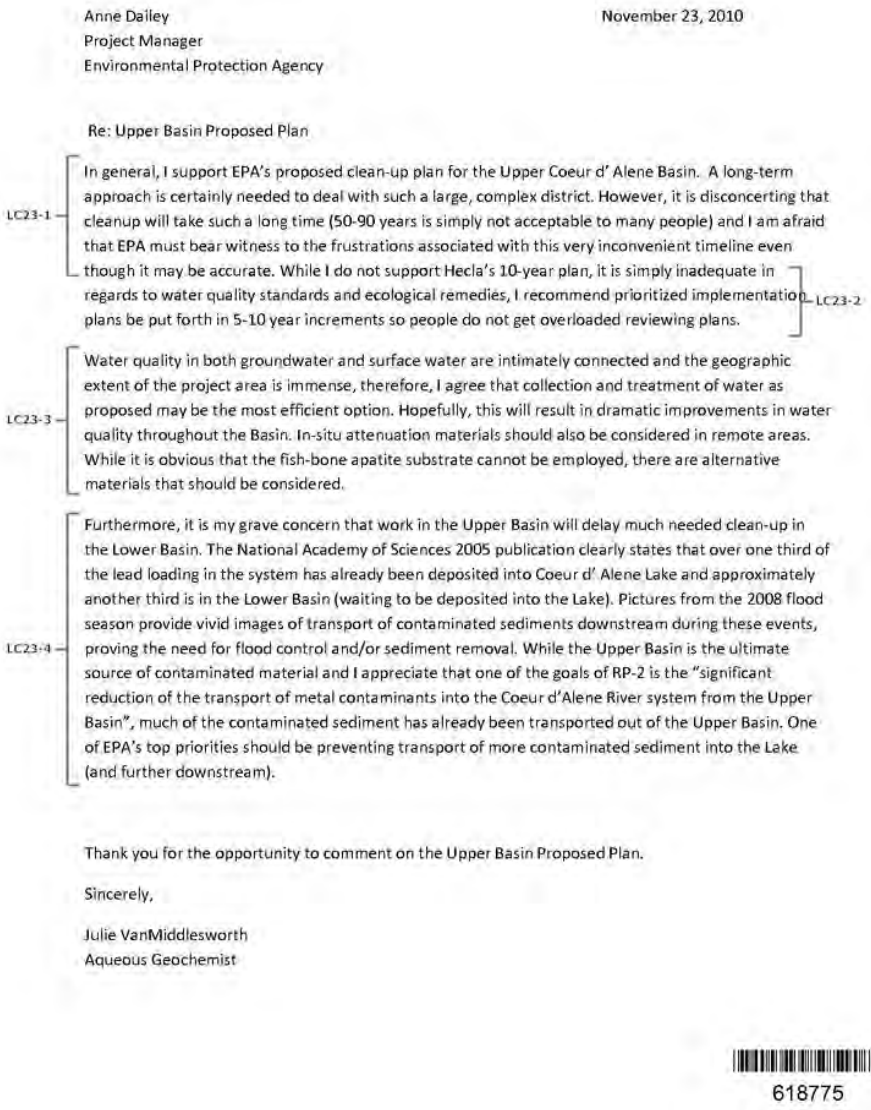
I'll end this with saying, if it can't be grown, it must be mined. And we'd like to keep our mining in the Valley.

BOB WHEELER: Thank you, Bruce. Wayne Grogg. Wayne Grogg here? Thank you. Mike Dexter and then Evy May Evelyn -- is that right -- and

Response to comment I231-1

See response to Comment No. I58-5.

Vanmiddlesworth, Julie, LC23, Letter 618775



Anne Dailey
Project Manager
Environmental Protection Agency

November 23, 2010

Re: Upper Basin Proposed Plan

LC23-1 — In general, I support EPA's proposed clean-up plan for the Upper Coeur d' Alene Basin. A long-term approach is certainly needed to deal with such a large, complex district. However, it is disconcerting that cleanup will take such a long time (50-90 years is simply not acceptable to many people) and I am afraid that EPA must bear witness to the frustrations associated with this very inconvenient timeline even though it may be accurate. While I do not support Hecla's 10-year plan, it is simply inadequate in regards to water quality standards and ecological remedies, I recommend prioritized implementation plans be put forth in 5-10 year increments so people do not get overloaded reviewing plans. — LC23-2

LC23-3 — Water quality in both groundwater and surface water are intimately connected and the geographic extent of the project area is immense, therefore, I agree that collection and treatment of water as proposed may be the most efficient option. Hopefully, this will result in dramatic improvements in water quality throughout the Basin. In-situ attenuation materials should also be considered in remote areas. While it is obvious that the fish-bone apatite substrate cannot be employed, there are alternative materials that should be considered.

LC23-4 — Furthermore, it is my grave concern that work in the Upper Basin will delay much needed clean-up in the Lower Basin. The National Academy of Sciences 2005 publication clearly states that over one third of the lead loading in the system has already been deposited into Coeur d' Alene Lake and approximately another third is in the Lower Basin (waiting to be deposited into the Lake). Pictures from the 2008 flood season provide vivid images of transport of contaminated sediments downstream during these events, proving the need for flood control and/or sediment removal. While the Upper Basin is the ultimate source of contaminated material and I appreciate that one of the goals of RP-2 is the "significant reduction of the transport of metal contaminants into the Coeur d'Alene River system from the Upper Basin", much of the contaminated sediment has already been transported out of the Upper Basin. One of EPA's top priorities should be preventing transport of more contaminated sediment into the Lake (and further downstream).

Thank you for the opportunity to comment on the Upper Basin Proposed Plan.

Sincerely,

Julie VanMiddlesworth
Aqueous Geochemist

618775

Response to comment LC23-1

See response to Comment No. I58-1.

Response to comment LC23-2

See responses to Comment Nos. I58-4 and LJ11-2.

Response to comment LC23-3

Thank you for your comment. In situ permeable reactive barriers (other than apatite) have been considered and will continue to be considered through the adaptive management process and as new technologies come to light. See response to Comment No. I899-7.

Response to comment LC23-4

Work in the Lower Basin is continuing with additional characterization and refinement of the Conceptual Site Model and will likely include pilot projects. EPA continues to pursue data collection and analysis efforts in the Lower Basin to support the future development and evaluation of remedial alternatives. After these studies have been completed, EPA expects to select additional cleanup actions, subject to public comment, to address contamination issues in the Lower Basin. Although the Lower Basin is not included in the Selected Remedy, actions in the Upper Basin are expected to improve water quality and reduce the movement of contaminated sediments downstream in the Lower Basin. Thus, the Upper Basin cleanup is expected to complement cleanup activities in the Lower Basin by reducing the flow of contaminated materials and reducing the potential for recontamination from the Upper Basin to the Lower Basin. Actions in the Lower Basin will be conducted concurrently with Upper Basin cleanups depending on recontamination and other factors.

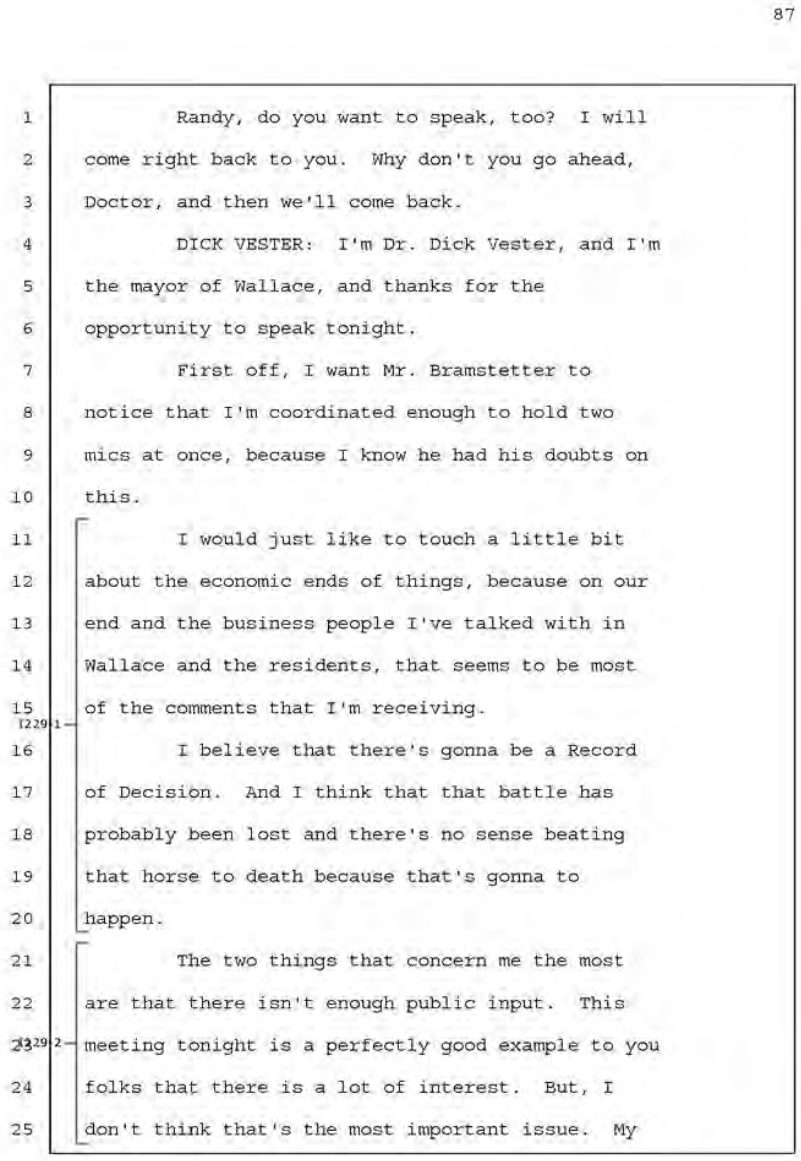
ROD comments
J Van
to:
CDABasin
11/23/2010 05:18 PM
Show Details

EPA,
Attached are my comments concerning the Upper Basin ROD amendment.

Thank you,
Julie VanMiddlesworth

618774

Vester, Dick, I229, Letter 610097-24



87

Randy, do you want to speak, too? I will come right back to you. Why don't you go ahead, Doctor, and then we'll come back.

DICK VESTER: I'm Dr. Dick Vester, and I'm the mayor of Wallace, and thanks for the opportunity to speak tonight.

First off, I want Mr. Bramstetter to notice that I'm coordinated enough to hold two mics at once, because I know he had his doubts on this.

I229-1 I would just like to touch a little bit about the economic ends of things, because on our end and the business people I've talked with in Wallace and the residents, that seems to be most of the comments that I'm receiving.

I believe that there's gonna be a Record of Decision. And I think that that battle has probably been lost and there's no sense beating that horse to death because that's gonna to happen.

The two things that concern me the most are that there isn't enough public input. This I229-2 meeting tonight is a perfectly good example to you folks that there is a lot of interest. But, I don't think that's the most important issue. My

Response to comment I229-1

Comment noted.

Response to comment I229-2

EPA's decision-making process was a careful and collaborative effort consistent with the National Oil and Hazardous Substances Pollution Contingency Plan, as required by CERCLA. EPA included input from state and local governments, tribes, other federal agencies, the Basin Commission and the public. EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of our work. Most importantly, we have encouraged the public to provide comments and input on remedy selection. As required, EPA received public comments on its Proposed Plan and is now selecting a remedy. An initial public comment period of 30 days is required by CERCLA for Proposed Plans. Anticipating a great deal of public interest, EPA set the initial public comment period for the Upper Basin Proposed Plan at 45 days. In response to requests for extension, EPA extended the comment period an additional 90 days, for a total of 135 days.

feelings are that the most important issue and the most comments I've been hearing from people is the concern about the 50 to 90 years, the impact that I229-3 that would have to our economics, and the idea that we would have the stigma of Superfund going on forever.

I know it's been requested by some of the industry to limit this current ROD to a five- to 10-year section. Now, I know from having been involved in business and other government entities such as school boards, we do long-term planning all the time. We don't do long-term planning for 50 years.

I229-4 So I would implore you as the most important issue, in my opinion, is to look at doing this on a lesser time frame. I think the current ROD should end in 10 years and funding and prioritized cleanup should then be looked at with technology changes and things that are done after that.

The City of Wallace intends to make written comments and make a formal presentation prior to the August 25th date, and I appreciate you having this meeting, even though I think it's not enough. And thank you for being here tonight.

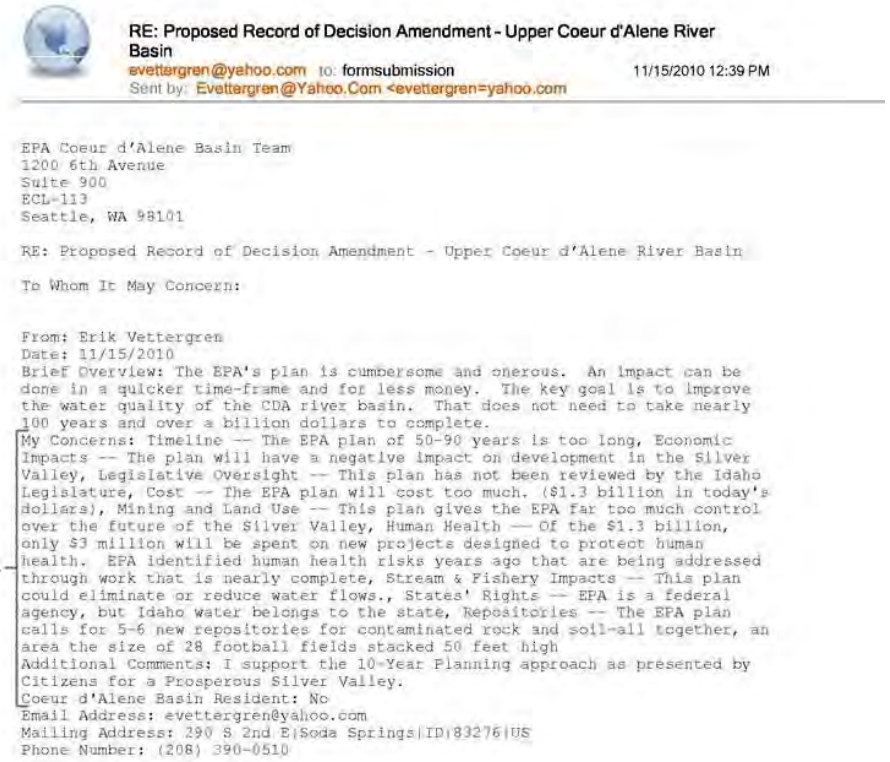
Response to comment I229-3

See responses to Comment Nos. I58-1 and I474-1.

Response to comment I229-4

See responses to Comment Nos. I58-1 and I474-2.

Vettergren, Erik, I431, Letter 616335



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
evettergren@yahoo.com to: formsubmission 11/15/2010 12:39 PM
Sent by: Evettergren@Yahoo.Com <evettergren=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Erik Vettergren
Date: 11/15/2010
Brief Overview: The EPA's plan is cumbersome and onerous. An impact can be done in a quicker time-frame and for less money. The key goal is to improve the water quality of the CDA river basin. That does not need to take nearly 100 years and over a billion dollars to complete.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: evettergren@yahoo.com
Mailing Address: 290 S 2nd E|Soda Springs|ID|83276|US
Phone Number: (208) 390-0510

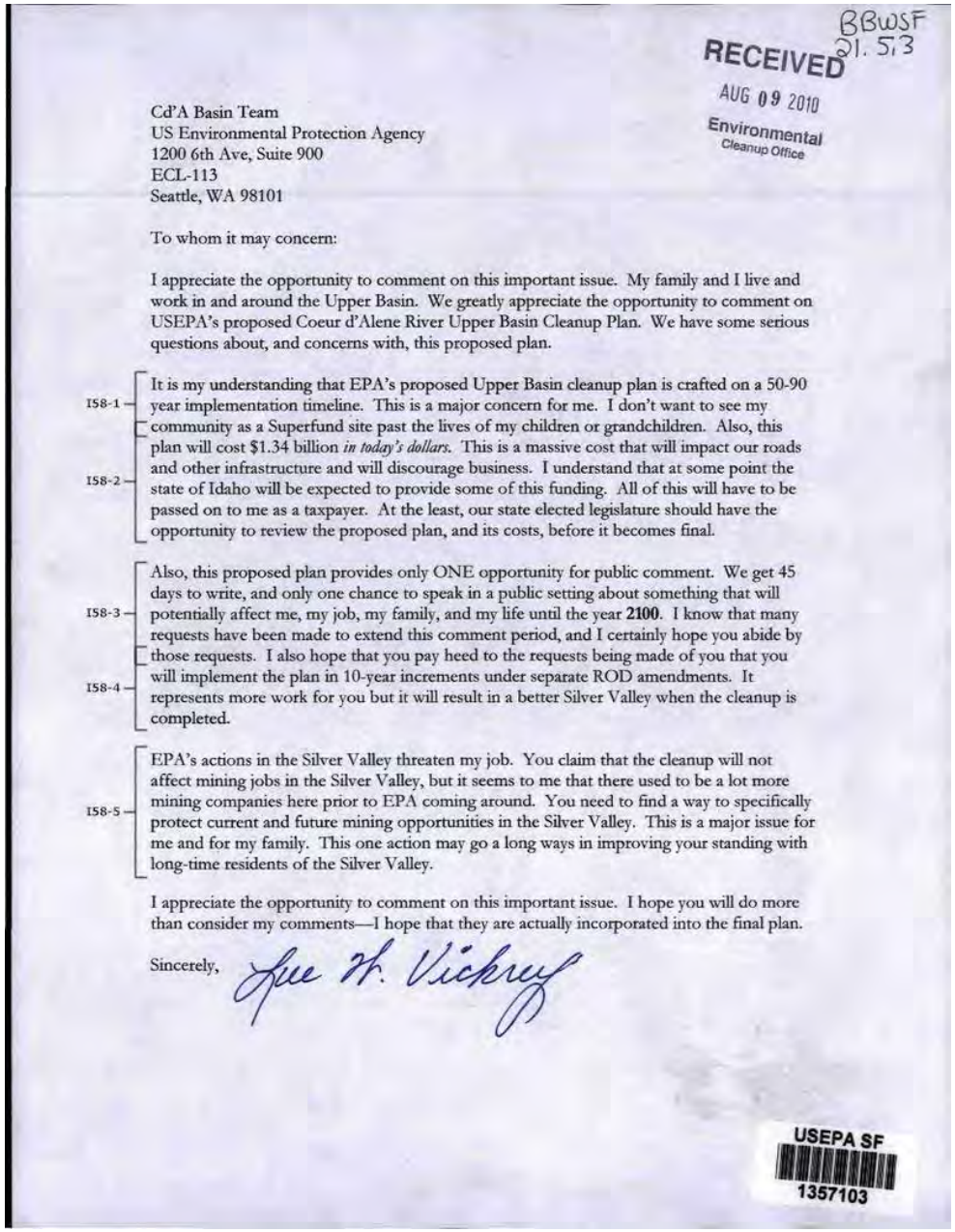
I431-1

616335

Response to comment I431-1

See response to Comment No. I351-1.

Vickrey, Lee, I58, Letter 1357103



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RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I58-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I58-2

I58-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you

I58-4 will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I58-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Lee M. Vickrey

USEPA SF
1357103

Response to comment I58-1

Due in part to extensive public concern about the duration of cleanup, EPA has decided to reduce the scope of the Selected Remedy by prioritizing the remedial actions that were identified as EPA's Preferred Alternative in the Proposed Plan. This resulted in a reduction in estimated cost from $1.3 billion to $635 million. The Upper Basin Selected Remedy is an interim remedy which identifies the priority remedial actions that are expected to provide the greatest reduction of contamination in the SFCDR and its tributaries and protection of in-place human health barriers in local communities. EPA's goal is to complete cleanup in the Upper Basin as quickly as possible and with minimum disruption. Most of the cleanup work will be in the areas of greatest contamination which are generally in less populated areas higher in stream drainages. Implementation of the Selected Remedy is expected to take about 30 years.

How long it takes to implement the Selected Remedy will ultimately depend upon the annual funding rate, the ability to work in multiple areas simultaneously, the overall pace of cleanup, and how well the environmental system responds to cleanup actions. As the cleanup progresses, EPA will routinely look for opportunities to speed up cleanup activities while identifying locations where no further or more limited action is required. Using the adaptive management process, EPA will also continually evaluate the effectiveness of the cleanup actions, as well as the need for additional actions.

Response to comment I58-2

EPA agrees that $1.3 billion is a considerable amount of money and has significantly reduced the scope of the Selected Remedy so that the total estimated cost is decreased by about half to $635 million. This includes capital costs as well as long-term operation and maintenance costs EPA's implementation planning process will also ensure that money is spent wisely to protect human health and the environment.

Under the Superfund law, EPA has a responsibility and the authority to take actions to ensure that the contamination in the Coeur d'Alene Basin is cleaned up to protect human health and the environment, and to communicate this cleanup to the public. The Preferred Alternative as presented in the Proposed Plan provided an overall vision of the required cleanup in the Upper Basin. Based on comments received from the public, EPA decided to reduce the scope of this ROD Amendment. The Selected Remedy is an interim remedy which identifies the priority remedial actions that are expected to provide the greatest reduction of contamination in the SFCDR and its tributaries and protection of in-place human health barriers in local communities. The Selected Remedy will make substantial progress toward the overall cleanup goals. EPA will ensure that settlement monies are spent wisely and will maximize the cleanup completed using these funds. This will be accomplished by rigorous implementation planning and pacing cleanup over time, allowing interest to accrue on the settlement monies.

EPA has listened and responded to comments received on the Proposed Plan to reduce the scope of the Selected Remedy. Furthermore, EPA has developed and documented an implementation approach to identify where the work starts, how it will proceed, how sites may be removed from the Selected Remedy should additional data indicate acceptable exposure risks, and how the community can be involved. The bottom line is that actions will be planned and implemented to ensure that those providing the highest value in terms of effectiveness per dollar spent are conducted first, with consideration of a variety of other factors in consultation with the Basin Commission's Upper Basin PFT and other community members. EPA understands that $635 million is still a large sum of money, but cleaning up contamination from a hundred years of past mining practices in this large and complex area will require considerable time and resources. The actions included in the Selected Remedy will provide a significant step forward in site cleanup and EPA is committed to getting the job done as efficiently as possible.

EPA will pay for much of the proposed cleanup with funds from legal settlements between mining companies and the federal government. The cleanup will proceed as quickly as possible while balancing the need to let interest accrue on the settlement monies, allowing for completion of the cleanup throughout the Upper and Lower Basin. Taxpayer dollars used to fund the cleanup, if any, will augment settlement funds.

At this time, EPA has recovered the largest amount of available settlement funds—more than $573 million—from the ASARCO bankruptcy proceedings completed in 2009. Of this total, $494 million is apportioned for EPA response activities and the remainder will be used for mitigation of natural resource damages. An independent Work Trust has been established to manage the ASARCO settlement funds and conduct the EPA-approved cleanup. The money held by the Work Trust is invested by a private firm, allowing this fund to continue to grow. Spending and investing under this Work Trust will be carefully managed by EPA to ensure the continued growth of the Trust while balancing the need to conduct cleanup in an efficient and a timely manner.

In 2011, a significant settlement was also reached with Hecla Mining Company. Under this settlement, Hecla will pay $263.4 million plus interest to the United States, the Coeur d'Alene Tribe, and the State of Idaho to resolve claims stemming from releases of wastes from its mining operations. Most (75 percent) of the recovery funds will be used for response actions at the Bunker Hill Superfund Site. The remaining amount will fund natural resource restoration projects.

Response to comment I58-3

Based on requests from the public after the Proposed Plan was issued, the comment period was extended 90 additional days, for a total of 135 days for both the Proposed Plan and the Draft Final FFS Report.

In addition, the issuance of the ROD Amendment does not mean an end to public involvement; the public will have continuing opportunities to provide input on how the cleanup is being implemented. EPA has committed to implement remedial actions in the Upper Basin through the Basin Commission process. Each year since the establishment of the Basin Commission and issuance of the OU 3 ROD in 2002, EPA has provided a summary of CERCLA-related activities for the one- and five-year work plans prepared by the Commission that summarize planned Basin-related activities. The one-year work plans establish and maintain the sequencing of activities that will be needed to complete the goals and objectives of the five-year plan. The Basin Commission Work Plans focus on general areas of work and do not go into project-specific detail. Per Basin Commission protocol, EPA's work plans are reviewed by the Commission's TLG and CCC, the Executive Director, and any other citizens who may wish to review and comment.

Response to comment I58-4

The Upper Basin ROD Amendment identifies an interim remedy that includes priority cleanup actions. The total estimated cost of the Selected Remedy as presented in the ROD Amendment is $635 million. The Selected Remedy is expected to require about 30 years to implement, but will be significantly shorter in duration than implementation of the Preferred Alternative as presented in the Proposed Plan. EPA anticipates that through the adaptive

management process and development of additional decision documents as necessary, the Upper Basin can be effectively cleaned up.

Response to comment I58-5

EPA is confident that cleanup and mining can coexist. The Upper Basin cleanup will address historical contamination from mining activities that began in the 1880s. Historical mine waste disposal practices were much different than they are today. For example, until 1968, significant amounts of mine wastes were discharged directly into creeks and rivers. This widespread contamination from past mining and smelting activities led to the necessity of CERCLA cleanup actions. Today, ongoing mining activities are regulated by state and federal laws other than CERCLA.

In response to public comments and concerns, the Upper Basin ROD Amendment clarifies the decision process for whether CERCLA cleanup actions will be conducted at "Active Facilities" (i.e., mining facilities among others). This process was developed through cooperation between EPA, IDEQ, and the community members and stakeholders involved in the Basin Environmental Improvement Project Commission's Upper Basin Project Focus Team. For the purposes of the ROD Amendment, an Active Facility is defined as a property where the owner is actively managing the risk of a release, or potential release, of a hazardous substance through regulatory mechanisms outside CERCLA that enforce compliance to protect human health and the environment. Active Facilities will continue to operate under those governing regulations and will be required to address the release of hazardous substances, as necessary, under those governing regulations. CERCLA cleanup actions will be conducted if data indicate that a release of hazardous substances has occurred or is occurring from a facility that poses risks to human health or the environment, and that this release is not being satisfactorily managed or addressed by the facility under an existing regulatory program.

EPA is confident that cleanup and mining can continue together in the Upper Basin. Where cleanup of historical contamination from past mining activities is planned in areas that are being currently mined, developed, or expanded, EPA will coordinate investigation, design, and cleanup work with the property owners. This approach will minimize disruption to Active Facilities.

One of the provisions of the Consent Decree between Hecla and EPA is for both parties to attend an annual planning meeting to coordinate the cleanup with ongoing exploration or development by Hecla. EPA is willing to coordinate with other mining companies in the Basin in a similar way, and welcomes further discussions with them.

Cleanup is not expected to restrict future mining and exploration in the Silver Valley. EPA is aware that mining has been an important part of the history and economy of the Silver Valley and will continue to be in the future. EPA also understands that mining companies need certainty for planning and investing, and is committed to completing cleanup actions in ways that allow mining operations to continue in compliance with environmental regulations.

Visher, Dennis, I776, Letter 618777

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mike.visher@sbcglobal.net to: formsubmission 11/17/2010 11:36 AM
Sent by: Mike.Visher@Sbcglobal.Net <mike.visher=sbcglobal.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment – Upper Coeur d'Alene River Basin

To Whom It May Concern:

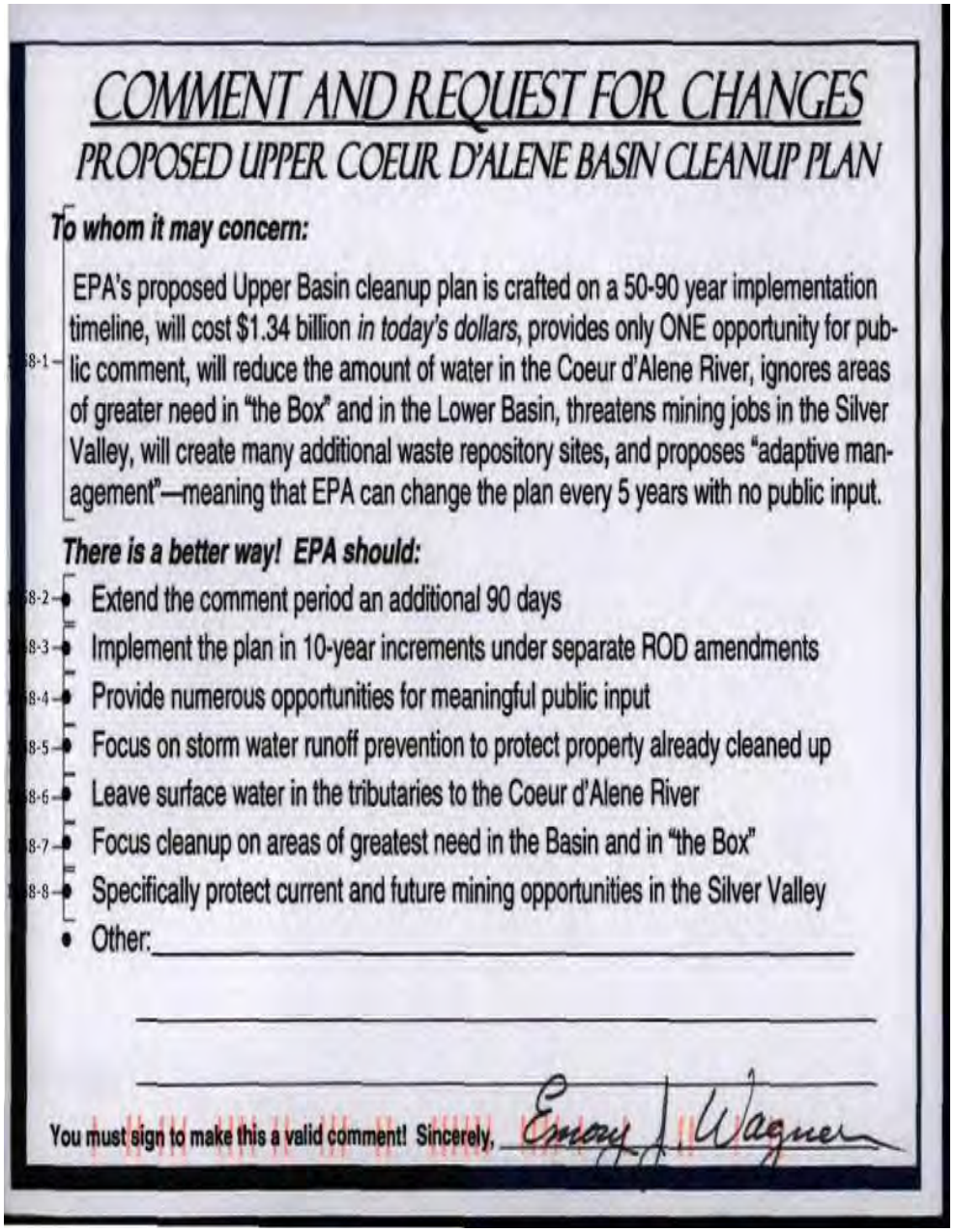
From: Dennis Visher
Date: 05/29/1963
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I776-1 — My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: mike.visher@sbcglobal.net
Mailing Address: 15140 Western Springs Dr.|Reno|Nevada|89521|US
Phone Number:

618777

Response to comment I776-1

See response to Comment No. I351-1.

Wagner, Emory, I158, Letter 1357294



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I58-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I58-2 Extend the comment period an additional 90 days
- I58-3 Implement the plan in 10-year increments under separate ROD amendments
- I58-4 Provide numerous opportunities for meaningful public input
- I58-5 Focus on storm water runoff prevention to protect property already cleaned up
- I58-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I58-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I58-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other: _____

_____

_____

You must sign to make this a valid comment! Sincerely, Emory J. Wagner

Response to comment I158-1
See response to Comment No. I25-1.

Response to comment I158-2
See response to Comment No. I25-2.

Response to comment I158-3
See response to Comment No. I25-3.

Response to comment I158-4
See response to Comment No. I25-4.

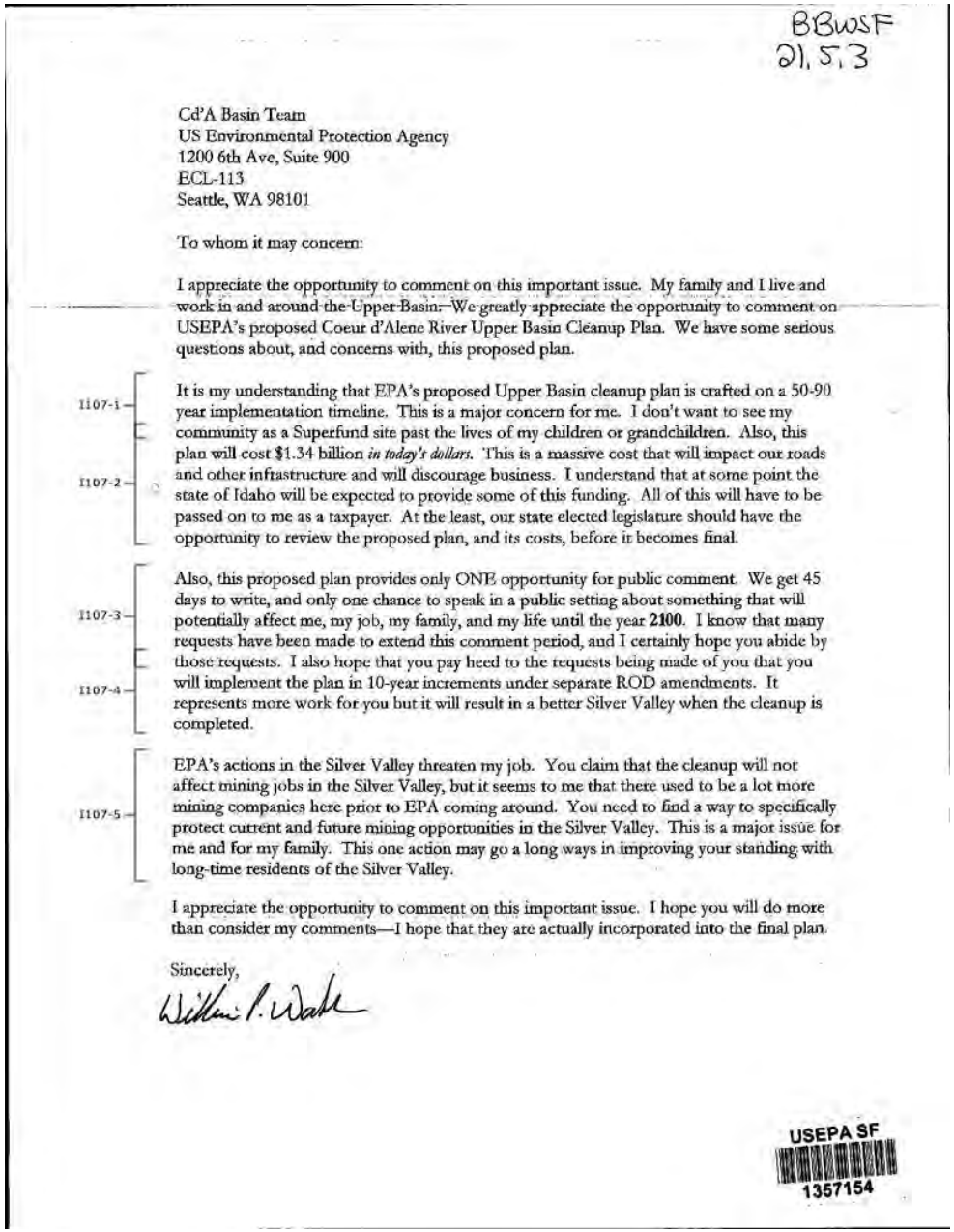
Response to comment I158-5
See response to Comment No. I25-5.

Response to comment I158-6
See response to Comment No. I25-6.

Response to comment I158-7
See response to Comment No. I25-7.

Response to comment I158-8
See response to Comment No. I25-8.

Wake, William P, I107, Letter 1357154



BBWSF
21,573

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I107-1 / I107-2: It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I107-3 / I107-4: Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I107-5: EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

William P. Wake

USEPA SF
1357154

Response to comment I107-1
See response to Comment No. I58-1.

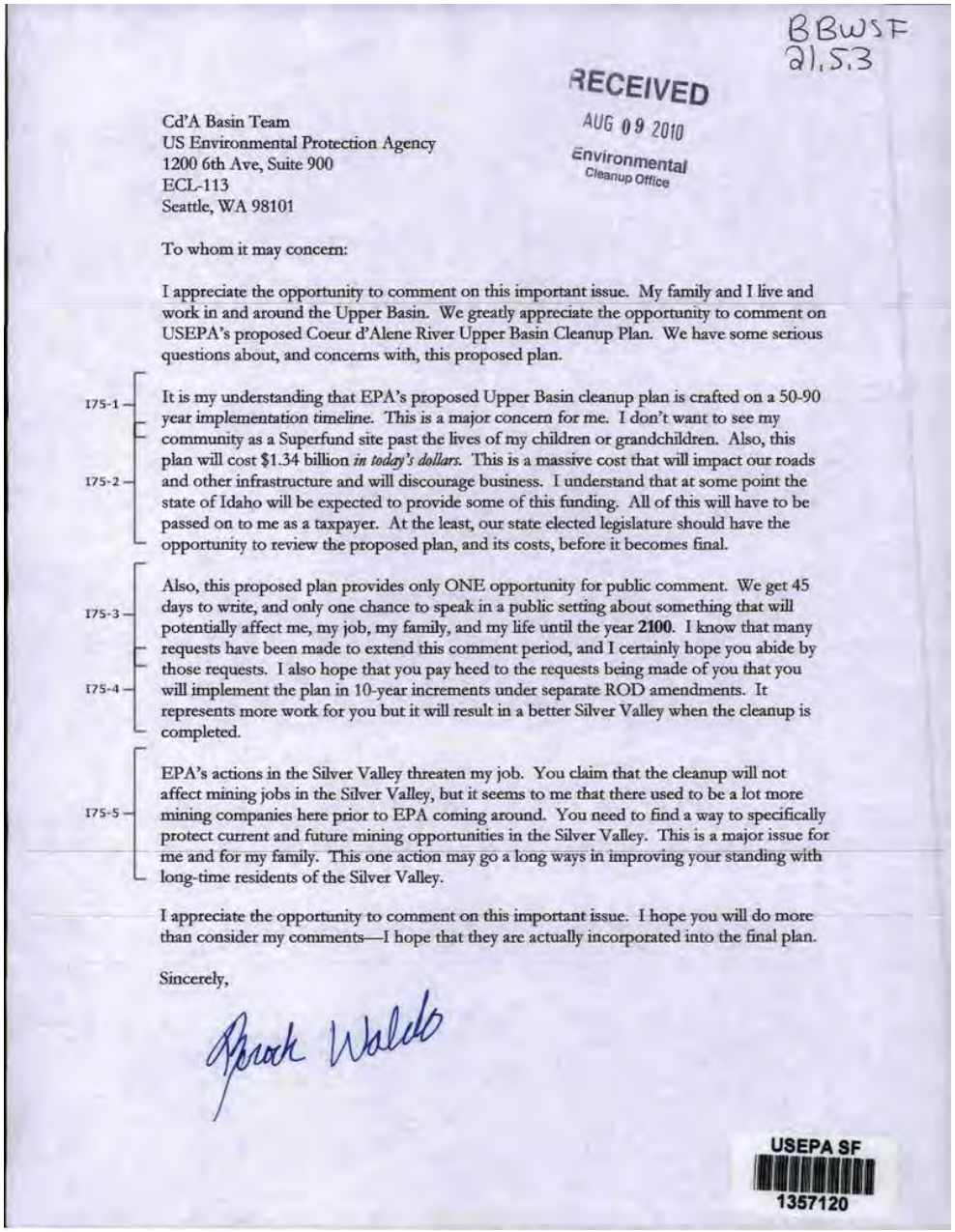
Response to comment I107-2
See response to Comment No. I58-2.

Response to comment I107-3
See response to Comment No. I58-3.

Response to comment I107-4
See response to Comment No. I58-4.

Response to comment I107-5
See response to Comment No. I58-5.

Waldo, Brock, I75, Letter 1357120



BBWSF
21.5.3

RECEIVED
AUG 09 2010
Environmental
Cleanup Office

Cd'A Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I75-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this
I75-2 plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I75-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by
I75-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I75-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,

Brock Waldo

USEPA SF
1357120

Response to comment I75-1
See response to Comment No. I58-1.

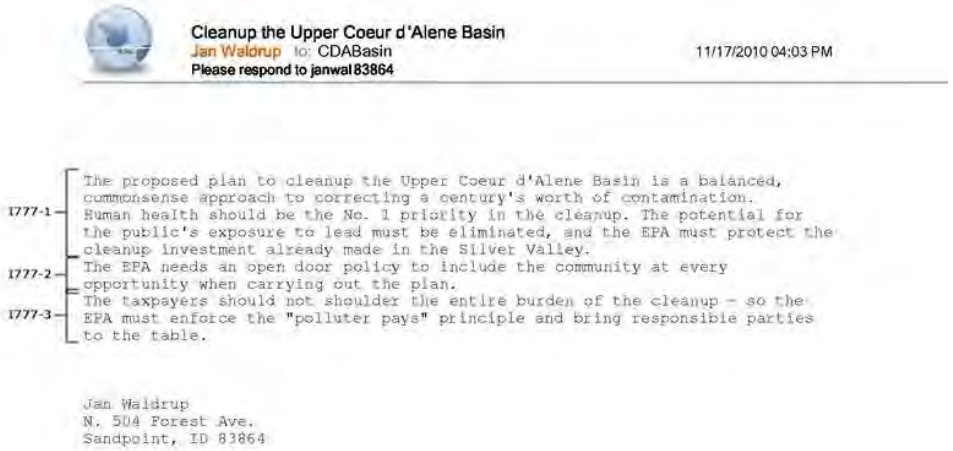
Response to comment I75-2
See response to Comment No. I58-2.

Response to comment I75-3
See response to Comment No. I58-3.

Response to comment I75-4
See response to Comment No. I58-4.

Response to comment I75-5
See response to Comment No. I58-5.

Waldrup, Jan, I777, Letter 618778



Cleanup the Upper Coeur d'Alene Basin
Jan Waldrup to: CDABasin 11/17/2010 04:03 PM
Please respond to janwal83864

I777-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I777-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I777-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Jan Waldrup
N. 504 Forest Ave.
Sandpoint, ID 83864

618778

Response to comment I777-1

See response to Comment No. I295-1.

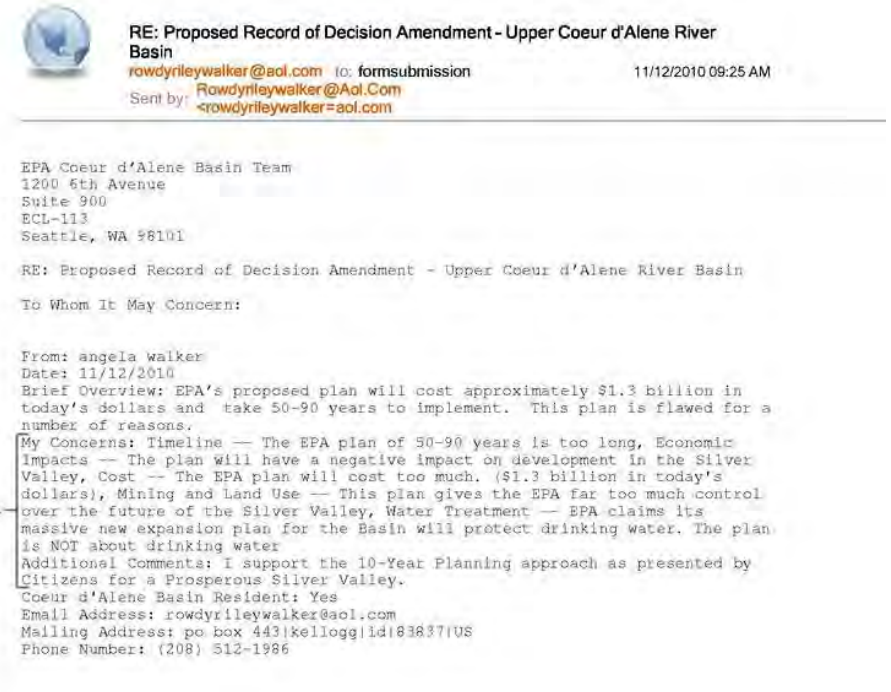
Response to comment I777-2

See response to Comment No. I295-2.

Response to comment I777-3

See response to Comment No. I295-3.

Walker, Angela, I432, Letter 616336



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

rowdyrileywalker@aol.com to: formsubmission 11/12/2010 09:25 AM

Sent by: Rowdyrileywalker@Aol.Com <rowdyrileywalker=aol.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: angela walker
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts — The plan will have a negative impact on development in the Silver Valley, Cost — The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use — This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment — EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: rowdyrileywalker@aol.com
Mailing Address: po box 443|kellogg|id|83837|US
Phone Number: (208) 512-1986

I432-1

616336

Response to comment I432-1

See response to Comment No. I351-1.

Walmer, Terry, I433, Letter 616337

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
murphy@icehouse.net to: formsubmission 11/12/2010 04:43 AM
Sent by: Murphy@Icehouse.Net <murphy=icehouse.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Terry Walmer
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley. I grew up in the Pine Creek area of the Silver Valley.
We kids all played, fished, picked berries, ~ all the myriad things that country kids did for fun. We have no ill effects from living there, WITH the contaminated
water flowing past our house in the East Fork of Pine Creek. The extended EPA Plan is asinine and unnecessary, both.
Terry Walmer
Coeur d'Alene Basin Resident: No
Email Address: murphy@icehouse.net
Mailing Address: P. O. Box 14, 8208 Blacktail Road|Athol|ID|83801-0014|US
Phone Number: (208) 683-2346

I433-1

I433-2

616337

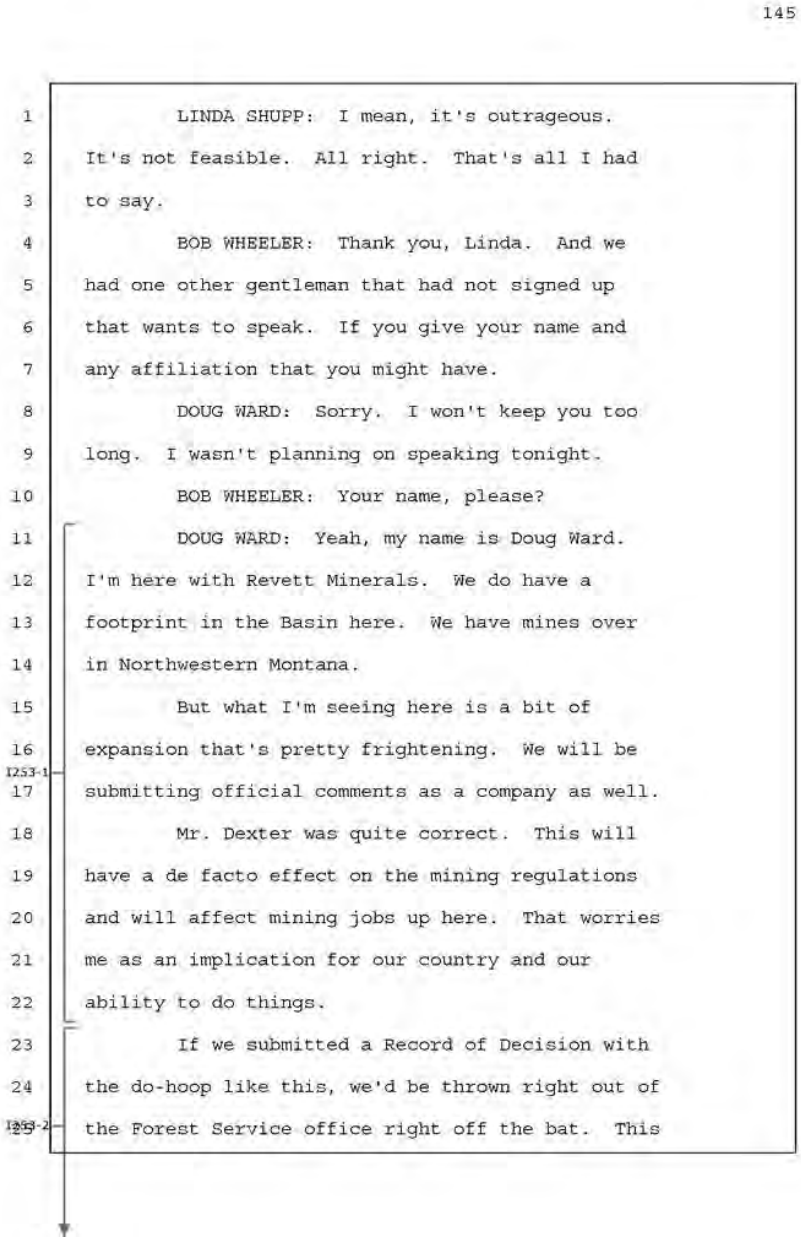
Response to comment I433-1

See response to Comment No. I351-1.

Response to comment I433-2

See response to Comment No. LJ39-5.

Ward, Doug, I253, Letter 610097-48



145

LINDA SHUPP: I mean, it's outrageous. It's not feasible. All right. That's all I had to say.

BOB WHEELER: Thank you, Linda. And we had one other gentleman that had not signed up that wants to speak. If you give your name and any affiliation that you might have.

DOUG WARD: Sorry. I won't keep you too long. I wasn't planning on speaking tonight.

BOB WHEELER: Your name, please?

DOUG WARD: Yeah, my name is Doug Ward. I'm here with Revett Minerals. We do have a footprint in the Basin here. We have mines over in Northwestern Montana.

But what I'm seeing here is a bit of expansion that's pretty frightening. We will be submitting official comments as a company as well. I253-1

Mr. Dexter was quite correct. This will have a de facto effect on the mining regulations and will affect mining jobs up here. That worries me as an implication for our country and our ability to do things.

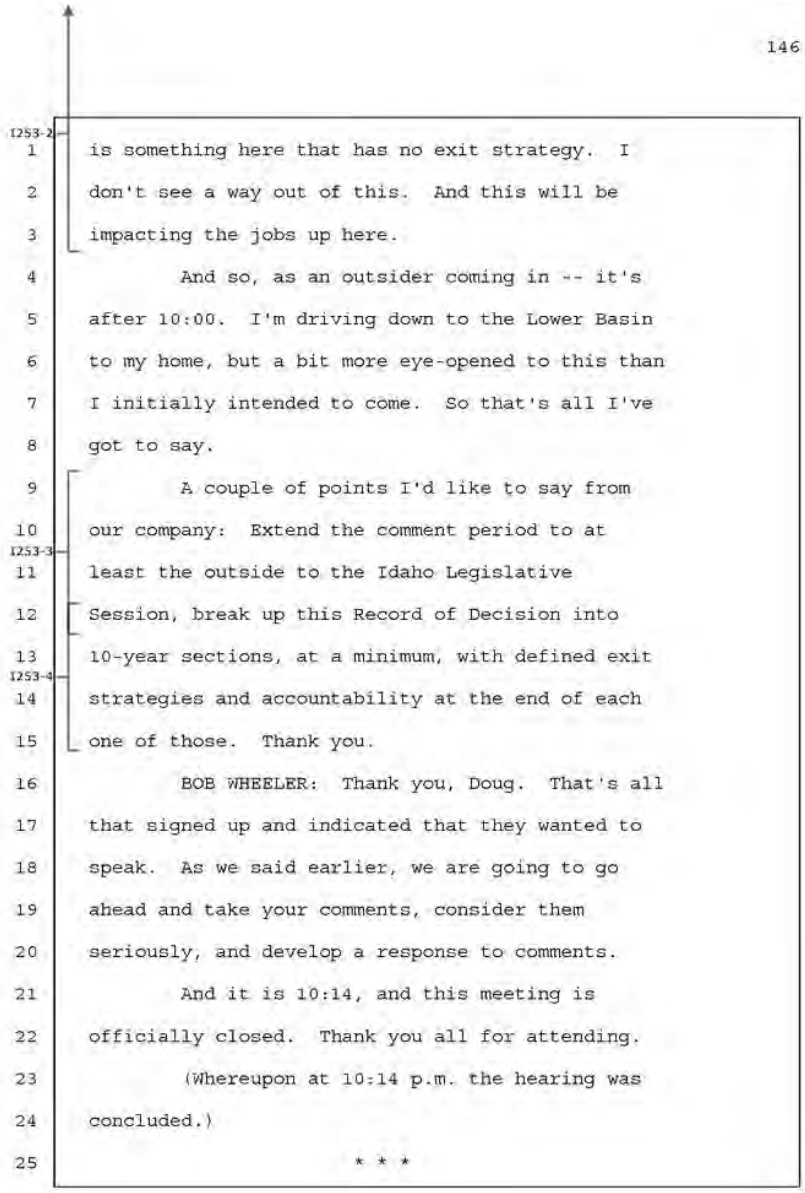
If we submitted a Record of Decision with the do-hoop like this, we'd be thrown right out of the Forest Service office right off the bat. This I253-2

Response to comment I253-1

See response to Comment No. I58-5.

Response to comment I253-2

See response to Comment No. I58-1.



146

I253-2
is something here that has no exit strategy. I don't see a way out of this. And this will be impacting the jobs up here.

And so, as an outsider coming in -- it's after 10:00. I'm driving down to the Lower Basin to my home, but a bit more eye-opened to this than I initially intended to come. So that's all I've got to say.

A couple of points I'd like to say from our company: Extend the comment period to at
I253-3
least the outside to the Idaho Legislative Session, break up this Record of Decision into 10-year sections, at a minimum, with defined exit
I253-4
strategies and accountability at the end of each one of those. Thank you.

BOB WHEELER: Thank you, Doug. That's all that signed up and indicated that they wanted to speak. As we said earlier, we are going to go ahead and take your comments, consider them seriously, and develop a response to comments.

And it is 10:14, and this meeting is officially closed. Thank you all for attending.

(Whereupon at 10:14 p.m. the hearing was concluded.)

* * *

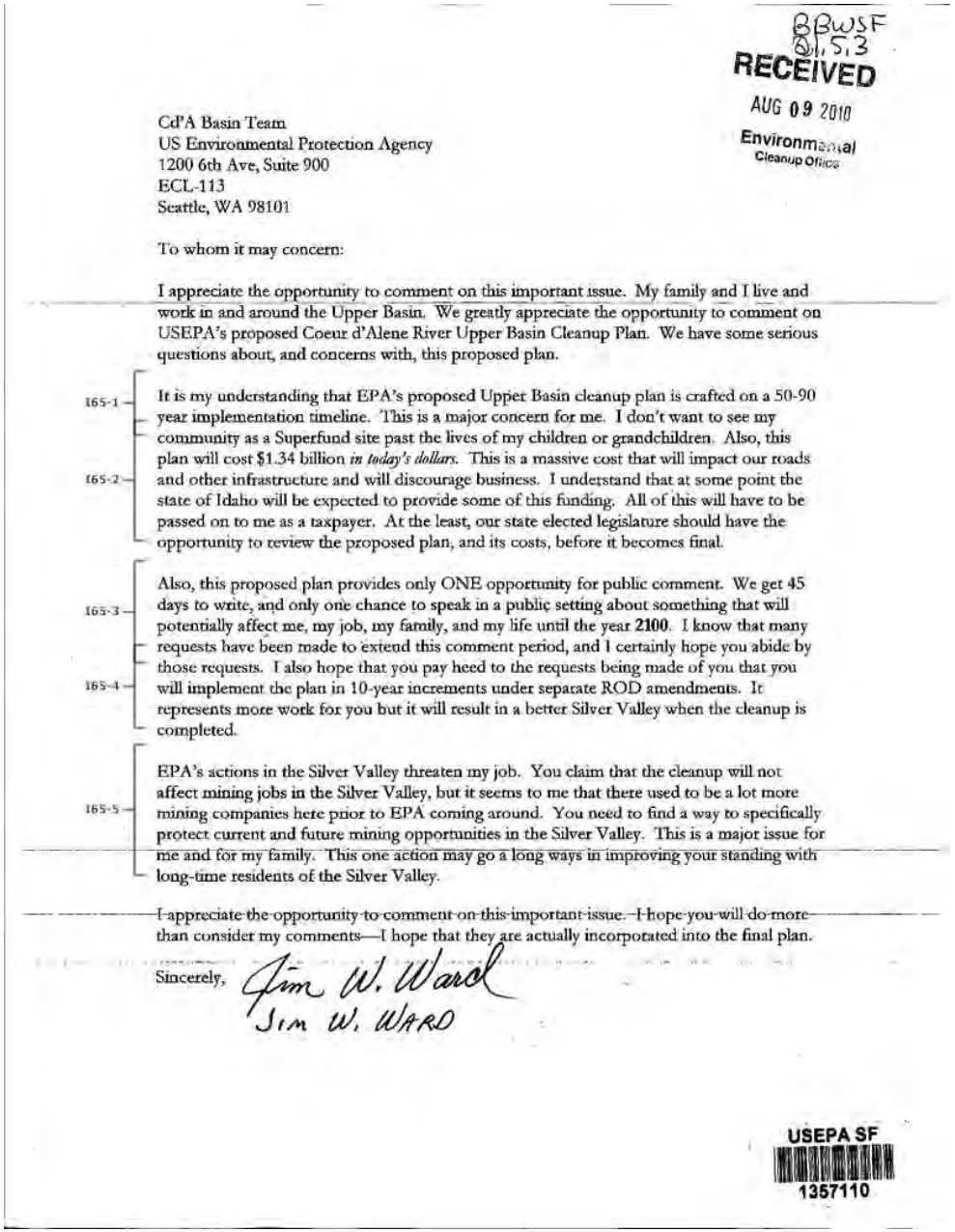
Response to comment I253-3

See response to Comment No. I54-6.

Response to comment I253-4

See responses to Comment Nos. I58-1, I58-4 and LJ11-2.

Ward, Jim, I65, Letter 1357110



BBWSF
01.53
RECEIVED
AUG 09 2010
Environmental
Cleanup Office

CdA Basin Team
US Environmental Protection Agency
1200 6th Ave, Suite 900
ECL-113
Seattle, WA 98101

To whom it may concern:

I appreciate the opportunity to comment on this important issue. My family and I live and work in and around the Upper Basin. We greatly appreciate the opportunity to comment on USEPA's proposed Coeur d'Alene River Upper Basin Cleanup Plan. We have some serious questions about, and concerns with, this proposed plan.

I65-1 It is my understanding that EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline. This is a major concern for me. I don't want to see my community as a Superfund site past the lives of my children or grandchildren. Also, this plan will cost $1.34 billion *in today's dollars*. This is a massive cost that will impact our roads
I65-2 and other infrastructure and will discourage business. I understand that at some point the state of Idaho will be expected to provide some of this funding. All of this will have to be passed on to me as a taxpayer. At the least, our state elected legislature should have the opportunity to review the proposed plan, and its costs, before it becomes final.

I65-3 Also, this proposed plan provides only ONE opportunity for public comment. We get 45 days to write, and only one chance to speak in a public setting about something that will potentially affect me, my job, my family, and my life until the year **2100**. I know that many requests have been made to extend this comment period, and I certainly hope you abide by
I65-4 those requests. I also hope that you pay heed to the requests being made of you that you will implement the plan in 10-year increments under separate ROD amendments. It represents more work for you but it will result in a better Silver Valley when the cleanup is completed.

I65-5 EPA's actions in the Silver Valley threaten my job. You claim that the cleanup will not affect mining jobs in the Silver Valley, but it seems to me that there used to be a lot more mining companies here prior to EPA coming around. You need to find a way to specifically protect current and future mining opportunities in the Silver Valley. This is a major issue for me and for my family. This one action may go a long ways in improving your standing with long-time residents of the Silver Valley.

I appreciate the opportunity to comment on this important issue. I hope you will do more than consider my comments—I hope that they are actually incorporated into the final plan.

Sincerely,
Jim W. Ward
JIM W. WARD

USEPA SF
1357110

Response to comment I65-1
See response to Comment No. I58-1.

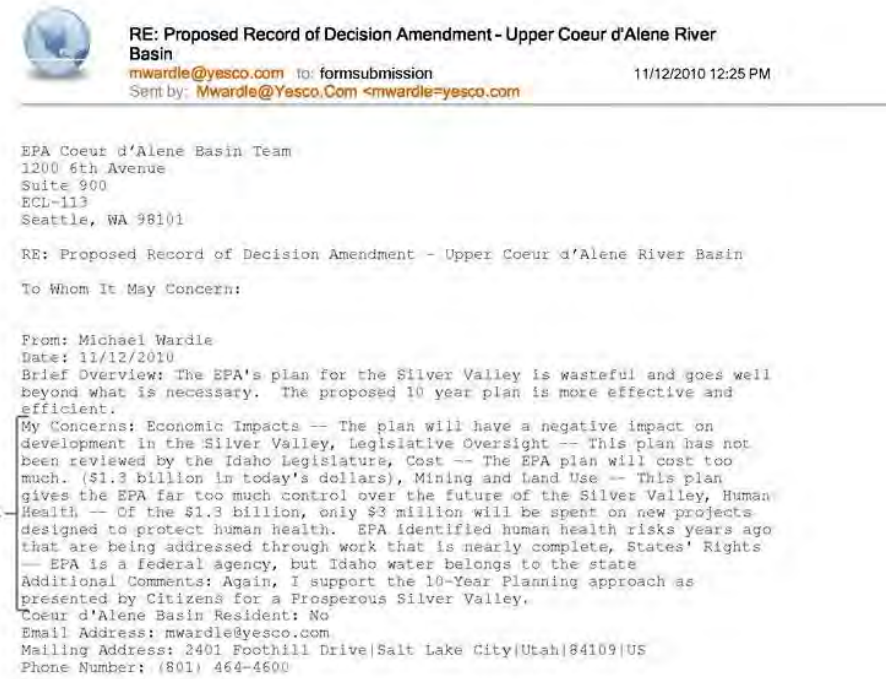
Response to comment I65-2
See response to Comment No. I58-2.

Response to comment I65-3
See response to Comment No. I58-3.

Response to comment I65-4
See response to Comment No. I58-4.

Response to comment I65-5
See response to Comment No. I58-5.

Wardle, Michael, I434, Letter 616338



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mwardle@yesco.com to: formsubmission 11/12/2010 12:25 PM
Sent by: Mwardle@Yesco.Com <mwardle=yesco.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Michael Wardle
Date: 11/12/2010
Brief Overview: The EPA's plan for the Silver Valley is wasteful and goes well beyond what is necessary. The proposed 10 year plan is more effective and efficient.
I434-1 — My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state
Additional Comments: Again, I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: mwardle@yesco.com
Mailing Address: 2401 Foothill Drive|Salt Lake City|Utah|84109|US
Phone Number: (801) 464-4600

616338

Response to comment I434-1

See response to Comment No. I351-1.

Wardwell, Anita, I778, Letter 618779

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
anita@anitawardwell.com to: formsubmission 11/18/2010 03:32 PM
Sent by: Anita@Anitawardwell.Com <anita=anitawardwell.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Anita Wardwell
Date: 11/18/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: anita@anitawardwell.com
Mailing Address: 416 W Cameron Ave|Kellogg|ID|83837|US
Phone Number: (208) 784-1388

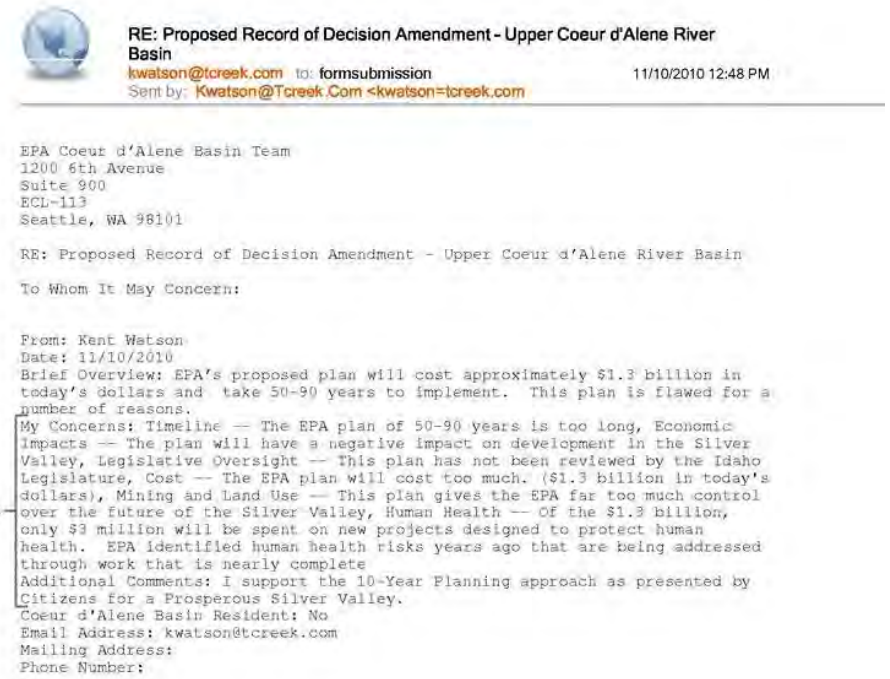
I778-1

618779

Response to comment I778-1

See response to Comment No. I351-1.

Watson, Kent, I435, Letter 616339



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
kwatson@tcreek.com to: formsubmission 11/10/2010 12:48 PM
Sent by: Kwatson@Tcreek.Com <kwatson=tcreek.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

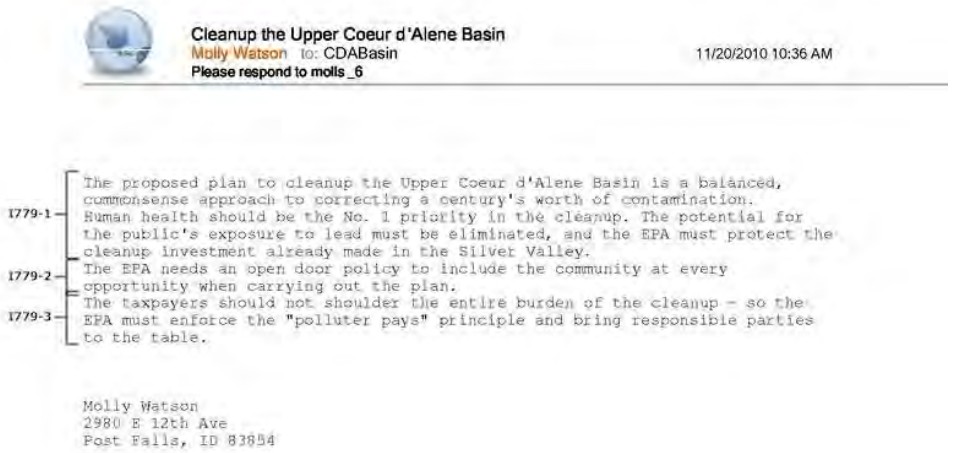
From: Kent Watson
Date: 11/10/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
1435-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: kwatson@tcreek.com
Mailing Address:
Phone Number:

616339

Response to comment I435-1

See response to Comment No. I351-1.

Watson, Molly, I779, Letter 618780



Cleanup the Upper Coeur d'Alene Basin
Molly Watson to: CDABasin 11/20/2010 10:36 AM
Please respond to molls_6

I779-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I779-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I779-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

Molly Watson
2980 E 12th Ave
Post Falls, ID 83854

618780

Response to comment I779-1

See response to Comment No. I295-1.

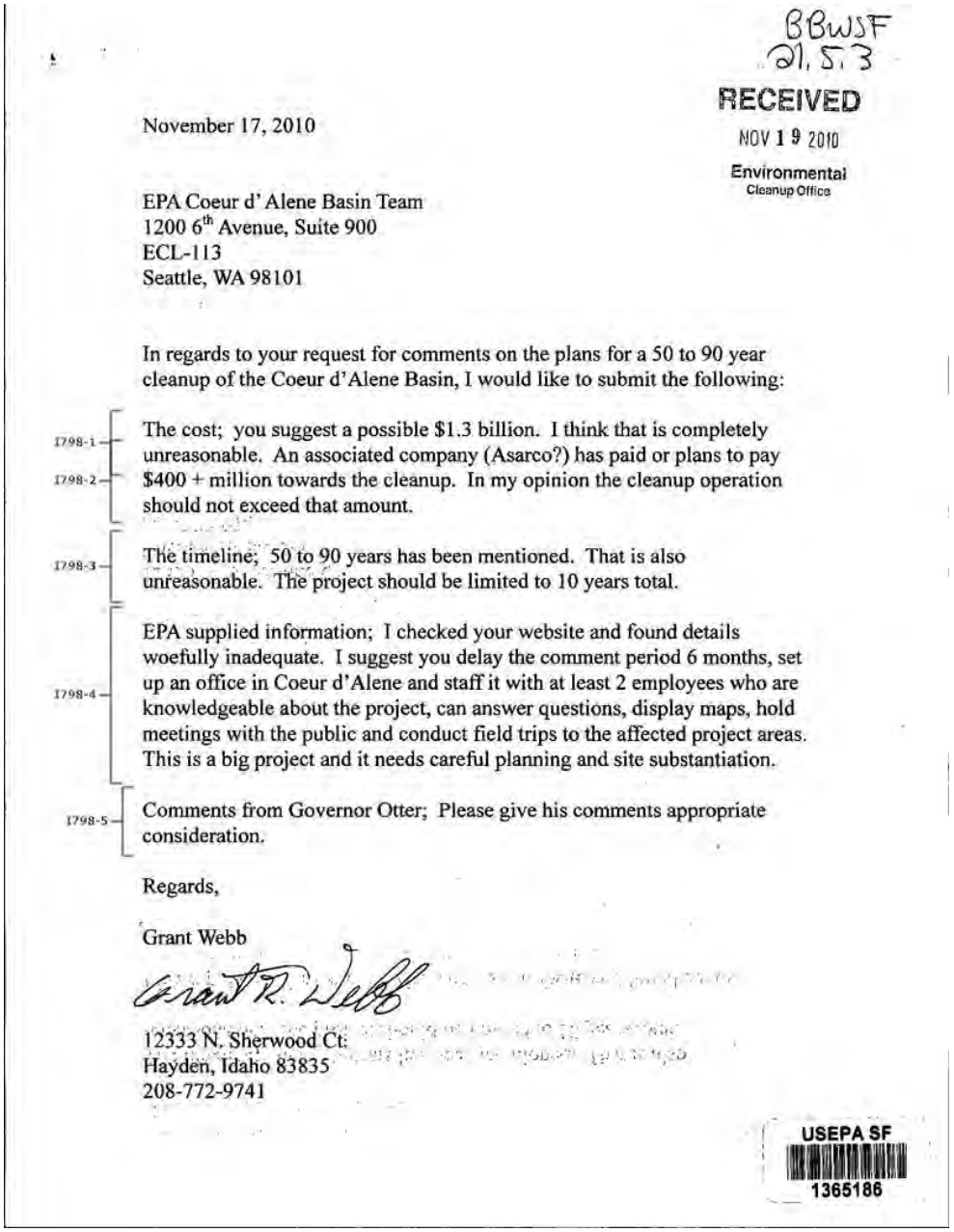
Response to comment I779-2

See response to Comment No. I295-2.

Response to comment I779-3

See response to Comment No. I295-3.

Webb, Grant, I798, Letter 1365186



BBWSF
21.5.3

RECEIVED
NOV 19 2010
Environmental
Cleanup Office

November 17, 2010

EPA Coeur d' Alene Basin Team
1200 6th Avenue, Suite 900
ECL-113
Seattle, WA 98101

In regards to your request for comments on the plans for a 50 to 90 year cleanup of the Coeur d'Alene Basin, I would like to submit the following:

I798-1, I798-2: The cost; you suggest a possible $1.3 billion. I think that is completely unreasonable. An associated company (Asarco?) has paid or plans to pay $400 + million towards the cleanup. In my opinion the cleanup operation should not exceed that amount.

I798-3: The timeline; 50 to 90 years has been mentioned. That is also unreasonable. The project should be limited to 10 years total.

I798-4: EPA supplied information; I checked your website and found details woefully inadequate. I suggest you delay the comment period 6 months, set up an office in Coeur d'Alene and staff it with at least 2 employees who are knowledgeable about the project, can answer questions, display maps, hold meetings with the public and conduct field trips to the affected project areas. This is a big project and it needs careful planning and site substantiation.

I798-5: Comments from Governor Otter; Please give his comments appropriate consideration.

Regards,

Grant Webb

Grant R. Webb

12333 N. Sherwood Ct.
Hayden, Idaho 83835
208-772-9741

USEPA SF
1365186

Response to comment I798-1
See response to Comment No. I58-2.

Response to comment I798-2
EPA has a statutory obligation under CERCLA to take actions to protect human health and the environment. Regarding the cost and funding see response to Comment No. I58-2.

Response to comment I798-3
See responses to Comment Nos. I58-1 and I474-2.

Response to comment I798-4
EPA has been, and will continue to be, committed to meaningful community participation throughout the Superfund process in the Coeur d'Alene Basin. Over the years, EPA has spent considerable time and energy to engage the public through all phases of its work. Most importantly, EPA has encouraged the public to provide comments and input on selection of the remedies for OUs 1, 2, and 3 and, most recently, the Selected Remedy for the Upper Basin. EPA agrees that it is helpful to have a community liaison available in the local area. In March 2011, EPA hired (through the "SEE" program) a local resident to serve this role. That individual later accepted a different position, resigning in 2012. The agency has recently been looking into options for re-establishing the position and is now moving forward with filling this position with someone from the local community. In addition, several local resources are available. Since 1994, EPA has maintained a field office in Coeur d'Alene, staffed with a key local contact for the cleanup. The office of the Coeur d'Alene Trust, heavily involved in cleanup work, is located in Kellogg. Also, the State Department of Environmental Quality has an office in Kellogg, staffed with knowledgeable people working on the cleanup. EPA encourages citizens to contact cleanup staff any time with questions or concerns.

Response to comment I798-5
Request noted.

Wegner, Ina May, I436, Letter 616340

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
imwegner@netscape.net to: formsubmission 11/12/2010 08:07 AM
Sent by: Imwegner@Netscape.Net <imwegner=netscape.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Ina May Wegner
Date: 11/12/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I436-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.

I436-2 EPA has been in our area for over twenty years which is long enough. I would not have allowed my yard to be remediated had I know what an terrible lawn I would end up with. Despite the money I spent to try to correct the mess EPA created when their work was completed, I do not have a satisfactory lawn. The roots of my trees are on the surface of the lawn making mowing difficult. The soil is so compacted I cannot drive a stake into the lawn without bending the tip. Noxious weeds were introduced to my lawn. The soil is so compacted that water doesn't sink in the soil like it should so my grass has moss growing in it.

You can tell what lawns have been remediated by the weeds and general ugliness of yards.

Personally, I think you have completed any other projects in our area. I suggest you go find another super fund site and call the Cd'A project complete.

616340

Response to comment I436-1

See response to Comment No. I351-1.

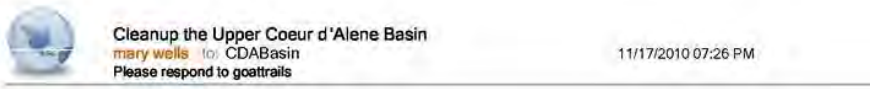
Response to comment I436-2

See response to Comment No. I521-8.

No Comments

Sincerely a Kellogg property owner, Ina May Wegner
Coeur d'Alene Basin Resident: Yes
Email Address: imwegner@netscape.net
Mailing Address: 112 E Cameron Ave|Kellogg|ID|83837|US
Phone Number: (208) 784-8595

Wells, Mary, I780, Letter 618781



Cleanup the Upper Coeur d'Alene Basin
mary wells to: CDABasin 11/17/2010 07:26 PM
Please respond to goattrails

I780-1 As a veteran 4th grade teacher, I am repeatedly stumped when after a trip to the historic places in the Silver Valley students learn of the continuing pollution throughout the area. I have no real answers for them as to why their government and community wishes to continually expose them and their families, visitors, and wildlife to the toxins left from the highly capitalistic mining industry.
I end up telling them that they need to study hard so they can grow up informed and involved as the mess will be unsolved yet when they turn 18.
Shame on the state of Idaho.
It is a crime.
Who pays? The miners who made a living from the mines?
The mine owners? The Shareholders? The tax payer?
In kindergarten students learn that when they make a mess they clean it up!
Hello??

mary wells
270 upper granite loop
athol, ID 83801

618781

Response to comment I780-1

Comment noted. See response to Comment No.I295-3.

Welsh, John, I781, Letter 618782

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
jwelsh@telesto-inc.com to: formsubmission 11/17/2010 11:35 AM
Sent by: Jwelsh@Telesto-Inc.Com <jwelsh=telesto-inc.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: John Welsh
Date: 11/17/2010
Brief Overview: EPA's proposed plan is an unnecessary expenditure of money that we do not have. This plan is flawed for a number of reasons, including
I781-1 that EPA has exceeded its authority because mine waste was excluded by the Bevill Amendment to RCRA.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed
I781-2 through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: No
Email Address: jwelsh@telesto-inc.com
Mailing Address: 5490 Longley Lane|Reno|NV|89511|US
Phone Number:

618782

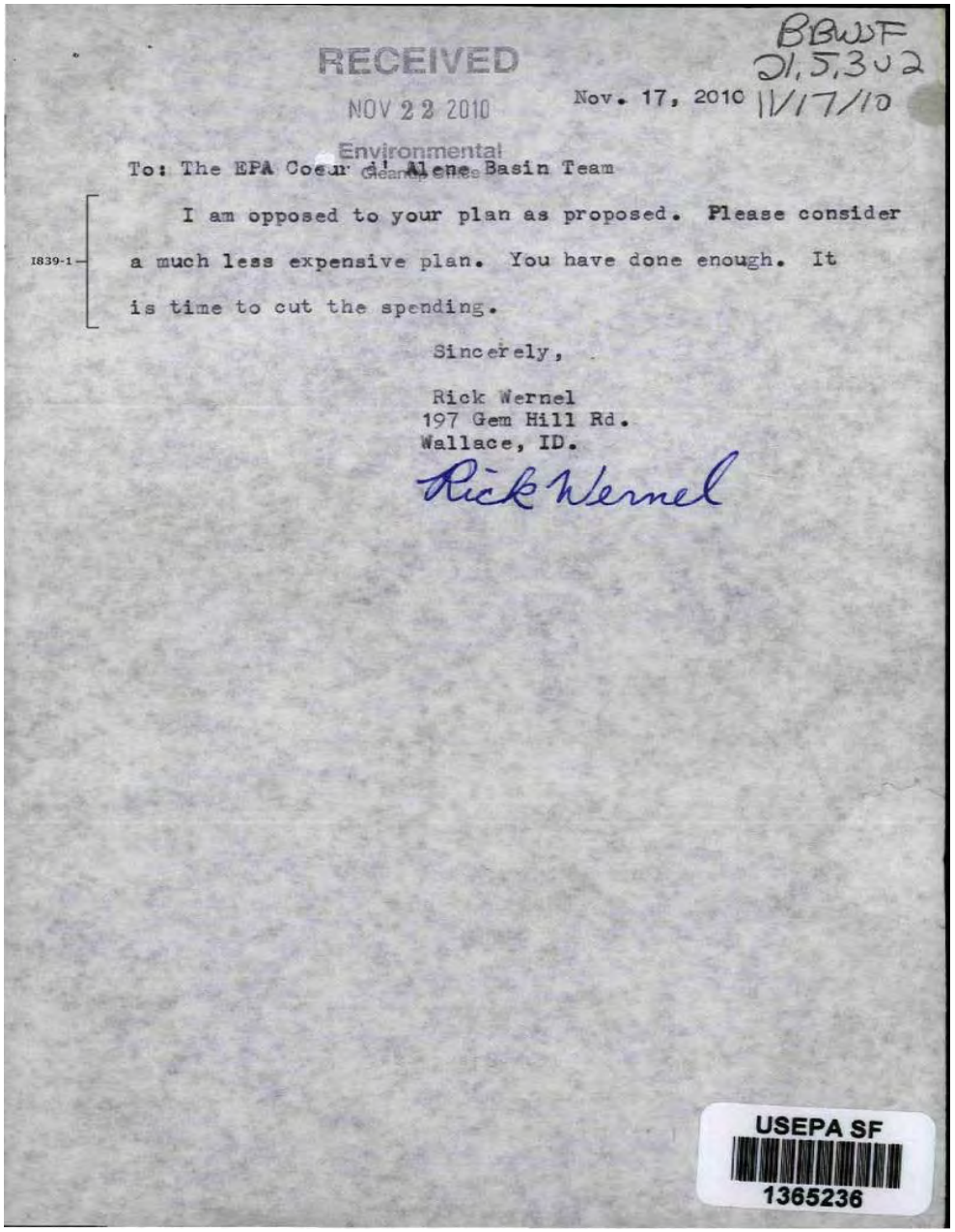
Response to comment I781-1

The Bevill Amendment exempts certain mining wastes from RCRA Subtitle C regulations. However, the Bevill exempted mining wastes are still subject to CERCLA response authority if they contain hazardous substances, pollutants or contaminants. The mining wastes addressed by the ROD Amendment contain several hazardous substances, including lead and zinc, and may be the subject of a CERCLA response action.

Response to comment I781-2

See response to Comment No. I351-1.

Wernel, Rick, I839, Letter 1365236



RECEIVED
NOV 22 2010
Environmental Cleanup Office

BBWF
21,5,302
11/17/10

Nov. 17, 2010

To: The EPA Coeur d' Alene Basin Team

I839-1 I am opposed to your plan as proposed. Please consider a much less expensive plan. You have done enough. It is time to cut the spending.

Sincerely,

Rick Wernel
197 Gem Hill Rd.
Wallace, ID.

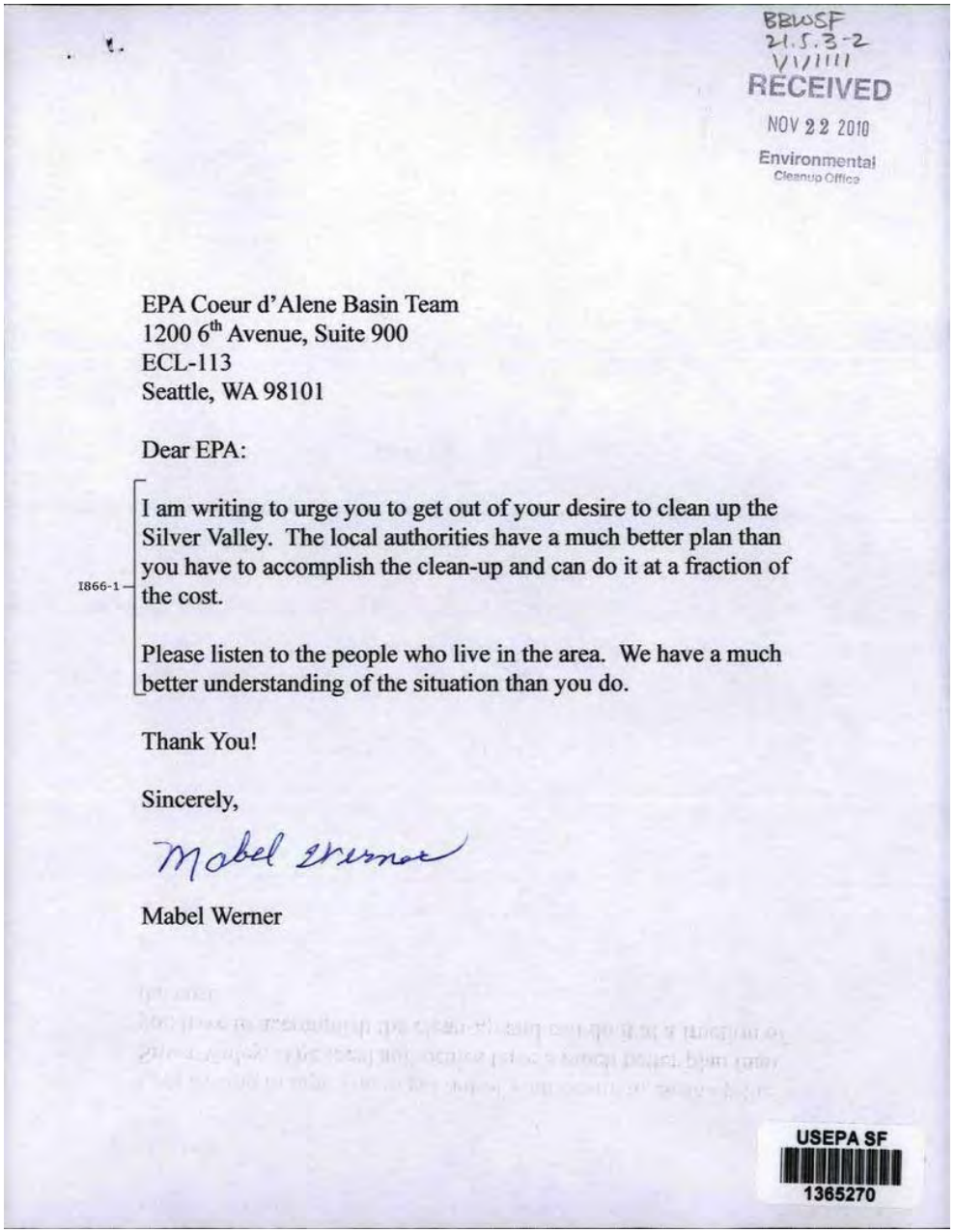
Rick Wernel

USEPA SF
1365236

Response to comment I839-1

See responses to Comment Nos. I58-1 and I58-2.

Werner, Mabel, I866, Letter 1365270



BBUSF
21.5.3-2
V1/1111
RECEIVED
NOV 22 2010
Environmental
Cleanup Office

EPA Coeur d'Alene Basin Team
1200 6th Avenue, Suite 900
ECL-113
Seattle, WA 98101

Dear EPA:

I866-1 I am writing to urge you to get out of your desire to clean up the Silver Valley. The local authorities have a much better plan than you have to accomplish the clean-up and can do it at a fraction of the cost.

Please listen to the people who live in the area. We have a much better understanding of the situation than you do.

Thank You!

Sincerely,

Mabel Werner

Mabel Werner

USEPA SF
1365270

Response to comment I866-1
Comment noted.

Wessela, Mike, I437, Letter 616341

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
mikewessela@wseco.com to: formsubmission 11/09/2010 07:53 AM
Sent by: Mikewessela@Wseco.Com <mikewessela=wseco.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Mike Wessela
Date: 11/09/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I437-1 My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Human Health -- Of the $1.3 billion, only $3 million will be spent on new projects designed to protect human health. EPA identified human health risks years ago that are being addressed through work that is nearly complete, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts -- This plan could eliminate or reduce water flows., Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: mikewessela@wseco.com
Mailing Address:
Phone Number:

616341

Response to comment I437-1

See response to Comment No. I351-1.

White, Jim, I756, Letter 618754

Basin ROD
Jim & Sherri
to:
CDABasin
11/18/2010 05:47 PM
Show Details

Good Day,

I756-1 The proposed plan to spend in excess of a BILLION $$$ and take up to 90 years is unacceptable.
I756-2 A plan that concentrates efforts to a 10 to 15 year maximum and costs in the $300 million range is ample, even by wasteful government spending standards.

I756-3 EPA has already been in the Basin for 20 years spending 100's of millions $$$.

Streamline and then get out, Your agency has already decreased my families standard of living to a point of near poverty.

Hopefully a heartfelt good ridance to the plague called EPA.

Jim White

618754

Response to comment I756-1

See responses to Comment Nos. I58-1 and I58-2.

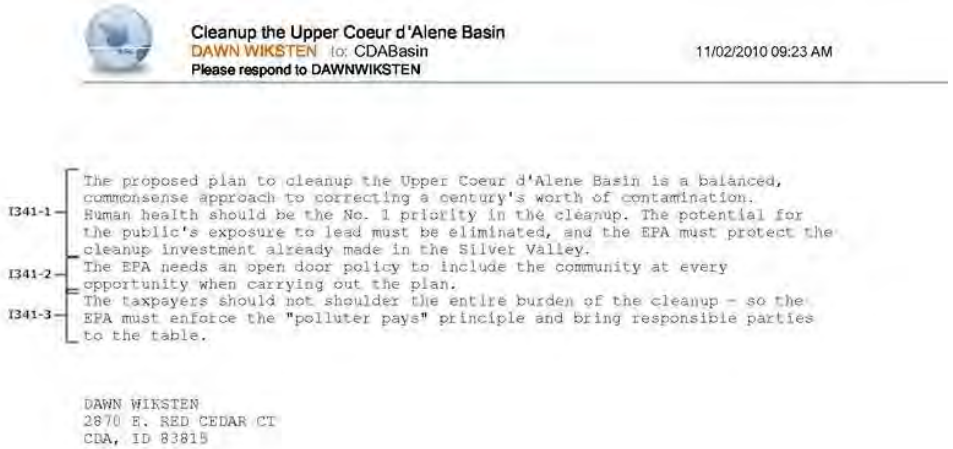
Response to comment I756-2

See response to Comment No. I474-2.

Response to comment I756-3

Comment noted.

Wiksten, Dawn, I341, Letter 614471



Cleanup the Upper Coeur d'Alene Basin
DAWN WIKSTEN to: CDABasin 11/02/2010 09:23 AM
Please respond to DAWNWIKSTEN

I341-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I341-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I341-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

DAWN WIKSTEN
2870 E. RED CEDAR CT
CDA, ID 83815

614471

Response to comment I341-1

See response to Comment No. I295-1.

Response to comment I341-2

See response to Comment No. I295-2.

Response to comment I341-3

See response to Comment No. I295-3.

Wilburn, Larry, I342, Letter 614472

cda upper basin clean up project
chief3fingers
to:
CDABasin
10/28/2010 04:50 PM
Show Details

I342-1 — So if environmental laws concerning hard rock mining water discharge were not enacted until 1968, (actually the Superfund laws were not enacted until 1980) then how can your agency justify 'suing' existing mining companies such as Hecla and the now bankrupted Asarco for approx 100 yrs of pollution? Have they not been in full compliance with environmental laws for the past 30 yrs? If not, then please tell me what days, months and years that they weren't, and what dollar amount you think (Hecla) should be liable for...I would like to know.

Thank you-

Sincerely,

Larry Wilburn

Wallace, Idaho

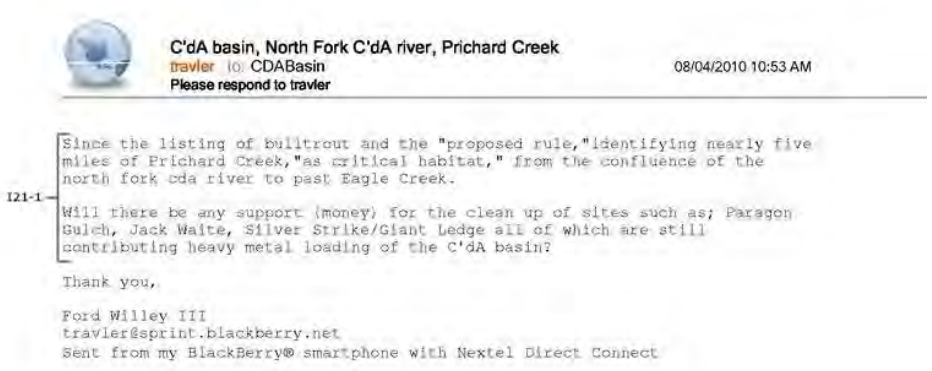
(208) 752-6202

614472

Response to comment I342-1

CERCLA applies a retroactive liability scheme. It also includes a defense based on federally permitted releases. No defendant in the Bunker Hill litigation was able to establish this defense to CERCLA liability.

Willey, Ford, I21, Letter 896745



C'dA basin, North Fork C'dA river, Prichard Creek
traviler to: CDABasin 08/04/2010 10:53 AM
Please respond to traviler

Since the listing of bulltrout and the "proposed rule,"identifying nearly five miles of Prichard Creek,"as critical habitat," from the confluence of the north fork cda river to past Eagle Creek.

I21-1 Will there be any support (money) for the clean up of sites such as; Paragon Gulch, Jack Waite, Silver Strike/Giant Ledge all of which are still contributing heavy metal loading of the C'dA basin?

Thank you,

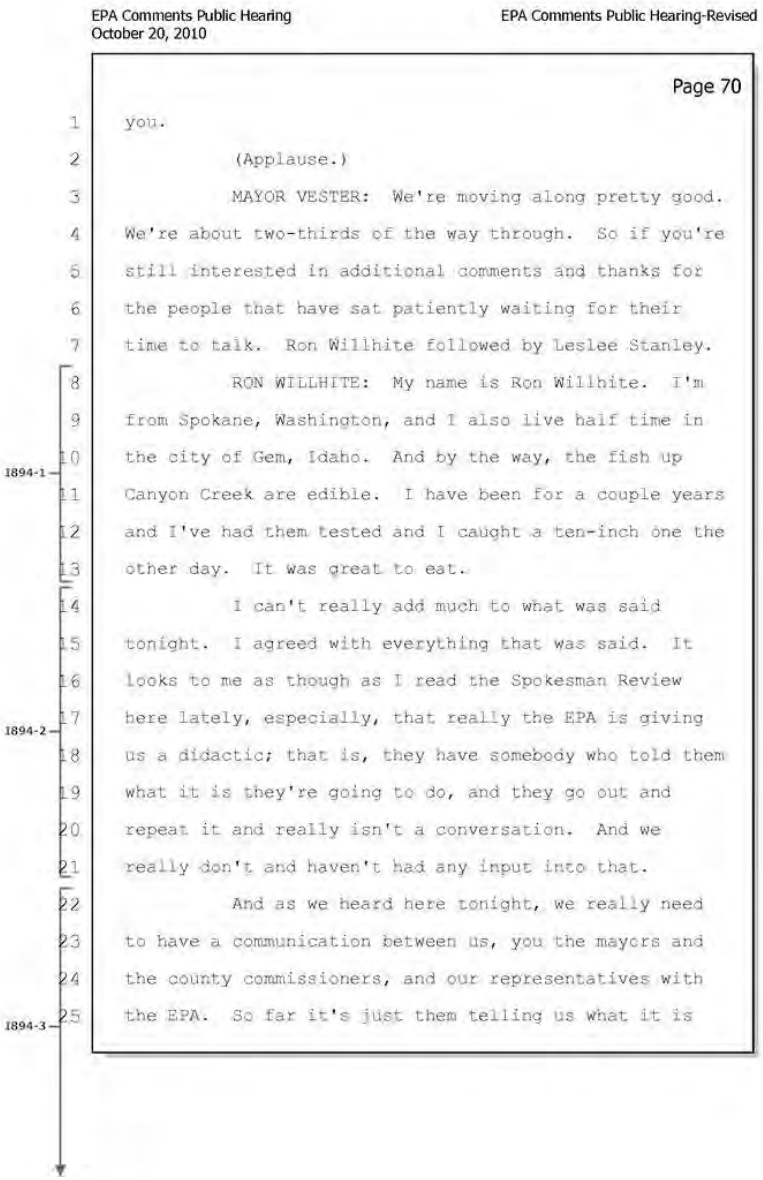
Ford Willey III
traviler@sprint.blackberry.net
Sent from my BlackBerry® smartphone with Nextel Direct Connect

896745

Response to comment I21-1

The North Fork of the Coeur d'Alene River (North Fork) is not included in the scope of the Selected Remedy in the Upper Basin ROD Amendment. There are sites contaminated from historic mining practices within the North Fork drainage which are being addressed under CERCLA and other authorities by other (non-EPA) agencies, primarily the U.S. Forest Service and the Idaho Department of Environmental Quality. An example of this type of work is the joint EPA and Forest Service removal action at the Jack Waite site.

Willhite, Ron, WA and Gem, Idaho, I894, Letter 619651-27



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 70

you.

(Applause.)

MAYOR VESTER: We're moving along pretty good. We're about two-thirds of the way through. So if you're still interested in additional comments and thanks for the people that have sat patiently waiting for their time to talk. Ron Willhite followed by Leslee Stanley.

RON WILLHITE: My name is Ron Willhite. I'm from Spokane, Washington, and I also live half time in the city of Gem, Idaho. And by the way, the fish up Canyon Creek are edible. I have been for a couple years and I've had them tested and I caught a ten-inch one the other day. It was great to eat. I894-1

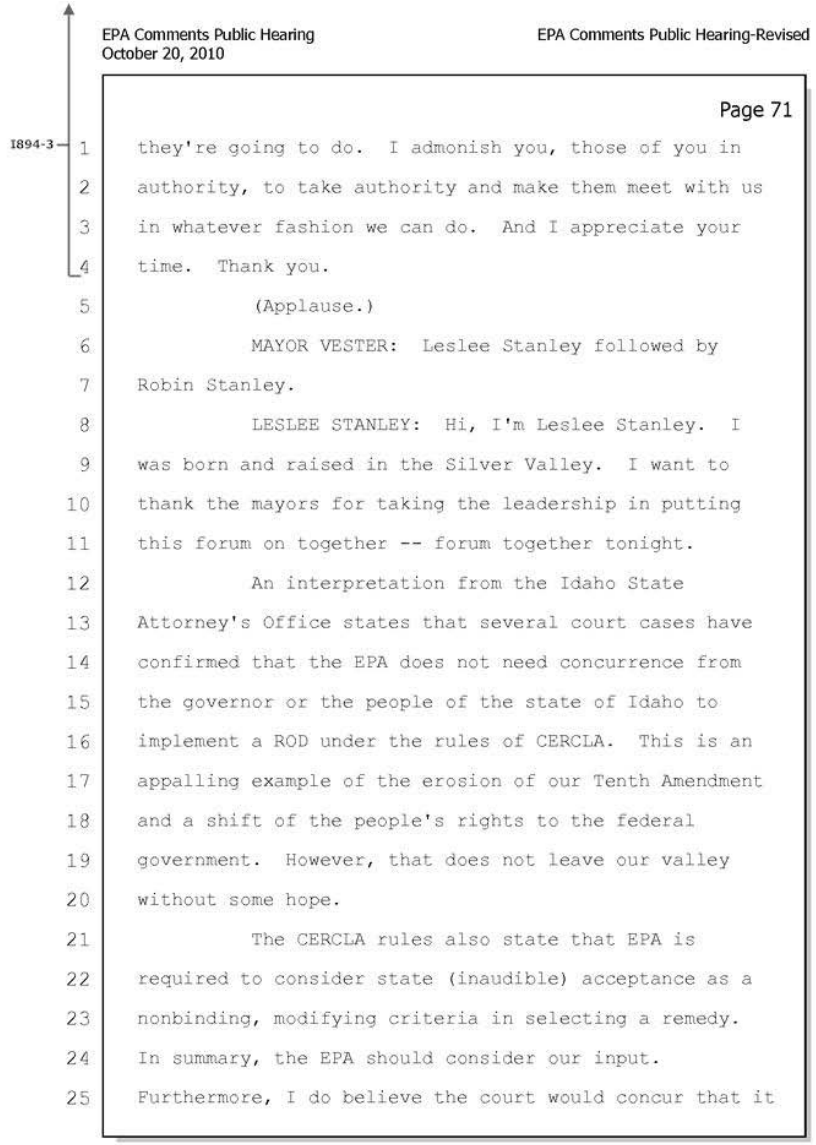
I can't really add much to what was said tonight. I agreed with everything that was said. It looks to me as though as I read the Spokesman Review here lately, especially, that really the EPA is giving us a didactic; that is, they have somebody who told them what it is they're going to do, and they go out and repeat it and really isn't a conversation. And we really don't and haven't had any input into that. I894-2

And as we heard here tonight, we really need to have a communication between us, you the mayors and the county commissioners, and our representatives with the EPA. So far it's just them telling us what it is I894-3

Response to comment I894-1
Comment noted.

Response to comment I894-2
See response to Comment No. I295-2.

Response to comment I894-3
See response to Comment No. I295-2.



EPA Comments Public Hearing
October 20, 2010

EPA Comments Public Hearing-Revised

Page 71

I894-3

they're going to do. I admonish you, those of you in authority, to take authority and make them meet with us in whatever fashion we can do. And I appreciate your time. Thank you.

(Applause.)

MAYOR VESTER: Leslee Stanley followed by Robin Stanley.

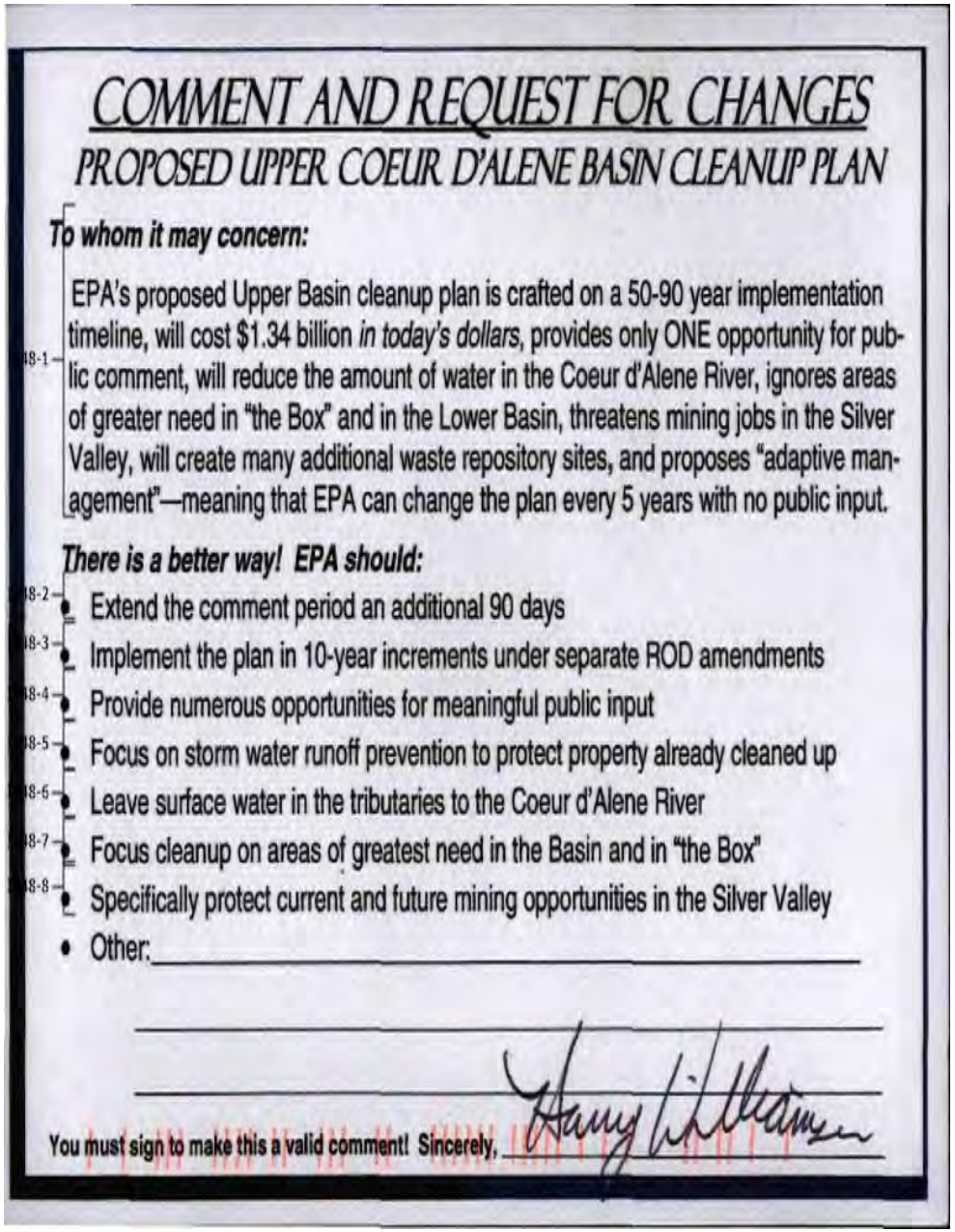
LESLEE STANLEY: Hi, I'm Leslee Stanley. I was born and raised in the Silver Valley. I want to thank the mayors for taking the leadership in putting this forum on together -- forum together tonight.

An interpretation from the Idaho State Attorney's Office states that several court cases have confirmed that the EPA does not need concurrence from the governor or the people of the state of Idaho to implement a ROD under the rules of CERCLA. This is an appalling example of the erosion of our Tenth Amendment and a shift of the people's rights to the federal government. However, that does not leave our valley without some hope.

The CERCLA rules also state that EPA is required to consider state (inaudible) acceptance as a nonbinding, modifying criteria in selecting a remedy. In summary, the EPA should consider our input. Furthermore, I do believe the court would concur that it

No comments

Williamson, Harry, I148, Letter 1357284



COMMENT AND REQUEST FOR CHANGES
PROPOSED UPPER COEUR D'ALENE BASIN CLEANUP PLAN

To whom it may concern:

I48-1 EPA's proposed Upper Basin cleanup plan is crafted on a 50-90 year implementation timeline, will cost $1.34 billion *in today's dollars*, provides only ONE opportunity for public comment, will reduce the amount of water in the Coeur d'Alene River, ignores areas of greater need in "the Box" and in the Lower Basin, threatens mining jobs in the Silver Valley, will create many additional waste repository sites, and proposes "adaptive management"—meaning that EPA can change the plan every 5 years with no public input.

There is a better way! EPA should:

- I48-2 Extend the comment period an additional 90 days
- I48-3 Implement the plan in 10-year increments under separate ROD amendments
- I48-4 Provide numerous opportunities for meaningful public input
- I48-5 Focus on storm water runoff prevention to protect property already cleaned up
- I48-6 Leave surface water in the tributaries to the Coeur d'Alene River
- I48-7 Focus cleanup on areas of greatest need in the Basin and in "the Box"
- I48-8 Specifically protect current and future mining opportunities in the Silver Valley
- Other:_____

You must sign to make this a valid comment! Sincerely, Harry Williamson

Response to comment I148-1
See response to Comment No. I25-1.

Response to comment I148-2
See response to Comment No. I25-2.

Response to comment I148-3
See response to Comment No. I25-3.

Response to comment I148-4
See response to Comment No. I25-4.

Response to comment I148-5
See response to Comment No. I25-5.

Response to comment I148-6
See response to Comment No. I25-6.

Response to comment I148-7
See response to Comment No. I25-7.

Response to comment I148-8
See response to Comment No. I25-8.

Wilson, Dennis ; Wilson, Kathie, I446, Letter 898785

ROD Amendment for Upper Coeur d'Alene Basin and Box/Proposed Cleanup Plan
Dennis Wilson
to:
CDABasin
09/07/2010 03:53 PM
Cc:
"Dennis A. Wilson", "Dennis & Kathie Wilson", Willohill
Show Details

History: This message has been replied to and forwarded.

I446-1 We would ask that you give us more time to Review this huge document and proposal for our area.
Initial review for those of us who live on the Lakes connected to the Coeur d'Alene River find and
I446-2 feel that this is over kill and
could have a detrimental effect on us, our water, our water usage, our Rivers and our Lakes for 90 years .
We draw our drinking water out of the Lake every day and have our water tested every year and
I446-3 have had no problems and/or
concerns with drinking, using it and eating the fish that we catch in the Lakes and incoming Rivers.
We would also ask for more opportunities for input on your final draft and plan through additional
I446-4 open public sessions with the EPA
and the local residence and business that will be affected by your proposed new Plan.

I446-5 Please put me on your mailing list for notices, press releases and announcements related to issues and projects affecting our area.
We live the whole year here on Lake Coeur d'Alene. Thank you.

Sincerely,

Dennis & Kathie Wilson
Windy Bay on Lake Coeur d'Alene
6816 W. Half Circle Loop
Worley, ID 83876-8678
home phone: (208) 765-6378

898785

Response to comment I446-1

See response to Comment No. I54-6.

Response to comment I446-2

The ROD Amendment, including the Selected Remedy, was developed in a manner consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as required by CERCLA. EPA's goal is to complete the cleanup in the Basin as quickly as possible and with minimum disruption. EPA is required by law to ensure protection of human health and the environment. The Upper Basin is a large area with complicated contamination issues that have evolved over a long period of time. The extent and nature of the contamination dictate that it will take substantial time and resources to clean up. The ROD Amendment provides details regarding the implementation approach for the Selected Remedy, including where the work starts and how it will proceed over time. With help from stakeholders and community members involved in the Basin Commission's Upper Basin PFT over the last several years, EPA developed a logical and transparent prioritization process for cleanup actions. Using this prioritization process, the Selected Remedy, an interim action, focuses on a prioritized set of cleanup actions. The actions include the most contaminated drainages (i.e., Ninemile and Canyon Creeks), areas that have the greatest adverse impact on groundwater and surface water (e.g., OU 2), and areas that provide protection for existing remedies. This process of prioritizing actions included in the Selected Remedy is consistent with the adaptive management approach. The estimated time for implementing the Selected Remedy is about thirty years.

Response to comment I446-3

Coeur d'Alene Lake is not within the scope of the Selected Remedy included in the Upper Basin ROD Amendment. EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site, and these risks still exist in the Upper Basin. Protecting human health remains EPA's highest priority. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediment, groundwater, and surface water that poses risks to people, wildlife, and the environment. The

levels of contamination significantly exceed acceptable state and site-specific water quality standards.

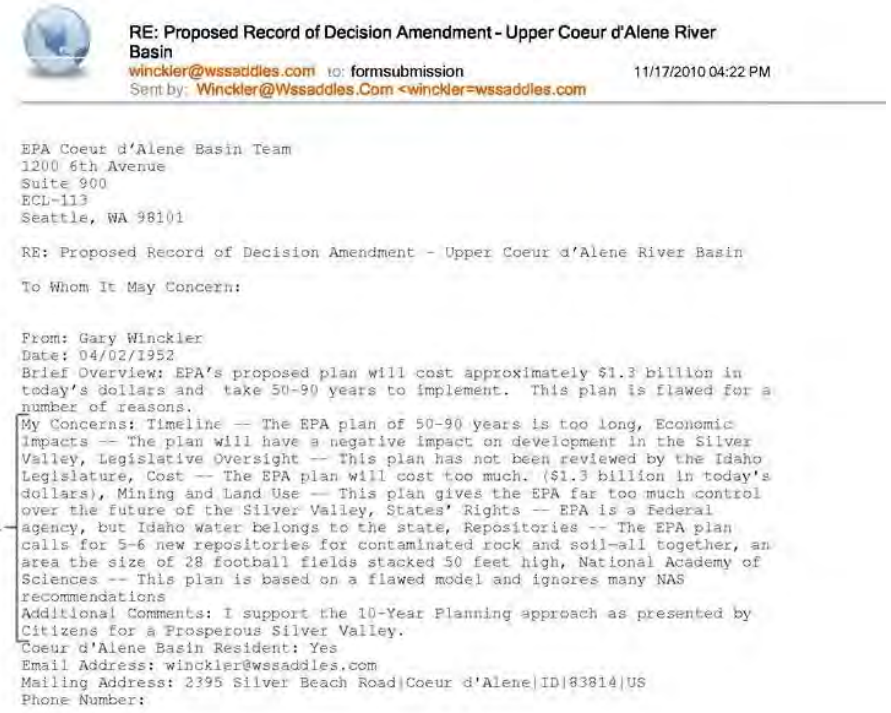
Response to comment I446-4

See responses to comment Nos. I295-2, I54-6, and LJ11-2.

Response to comment I446-5

Thank you for your request. Your address has been added to EPA's mailing list.

Winckler, Gary, I784, Letter 618785



RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
winckler@wssaddles.com to: formsubmission 11/17/2010 04:22 PM
Sent by: Winckler@Wssaddles.Com <winckler=wssaddles.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Gary Winckler
Date: 04/02/1952
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
My Concerns: Timeline -- The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
Coeur d'Alene Basin Resident: Yes
Email Address: winckler@wssaddles.com
Mailing Address: 2395 Silver Beach Road|Coeur d'Alene|ID|83814|US
Phone Number:

I784-1

618785

Response to comment I784-1

See response to Comment No. I351-1.

Woempner, Katrina, I438, Letter 616342

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
krazykappaloosas@yahoo.com to: formsubmission 11/15/2010 03:10 PM
Sent by: Krazykappaloosas@Yahoo.Com <krazykappaloosas=yahoo.com

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Katrina Woempner
Date: 11/15/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.

I438-1 My Concerns: Timeline — The EPA plan of 50-90 years is too long, Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, Water Treatment -- EPA claims its massive new expansion plan for the Basin will protect drinking water. The plan is NOT about drinking water, Stream & Fishery Impacts — This plan could eliminate or reduce water flows., States' Rights — EPA is a federal agency, but Idaho water belongs to the state, Repositories -- The EPA plan calls for 5-6 new repositories for contaminated rock and soil-all together, an area the size of 28 football fields stacked 50 feet high

I438-2 Additional Comments: I am greatly concerned that the "real" issue is not being addressed properly. What are you going to do about where the water is coming from, how is it being contaminated, and how is this going to affect not only the watersheds, but the land itself? As someone who spends a lot of time in the Silver Valley I think your plan is going to do more harm than good. Also, you need to consider the fact that the water has probably ALWAYS had contaminents as this land is rich in its natural resources (minerals) and I would like to see solid evidence that this has happened because of mining on has not always been the norm.

I438-3 Another big concern I have is have you studied what the impact to the habitat (ie: trees, brush, wildlife) is going to be with removing the groundwater? I do not think enough study has gone into this issue for it to move forward.
Coeur d'Alene Basin Resident: No
Email Address: krazykappaloosas@yahoo.com
Mailing Address: PO Box 1112|Hayden|Idaho|83835|US
Phone Number:

616342

Response to comment I438-1

See response to Comment No. I351-1.

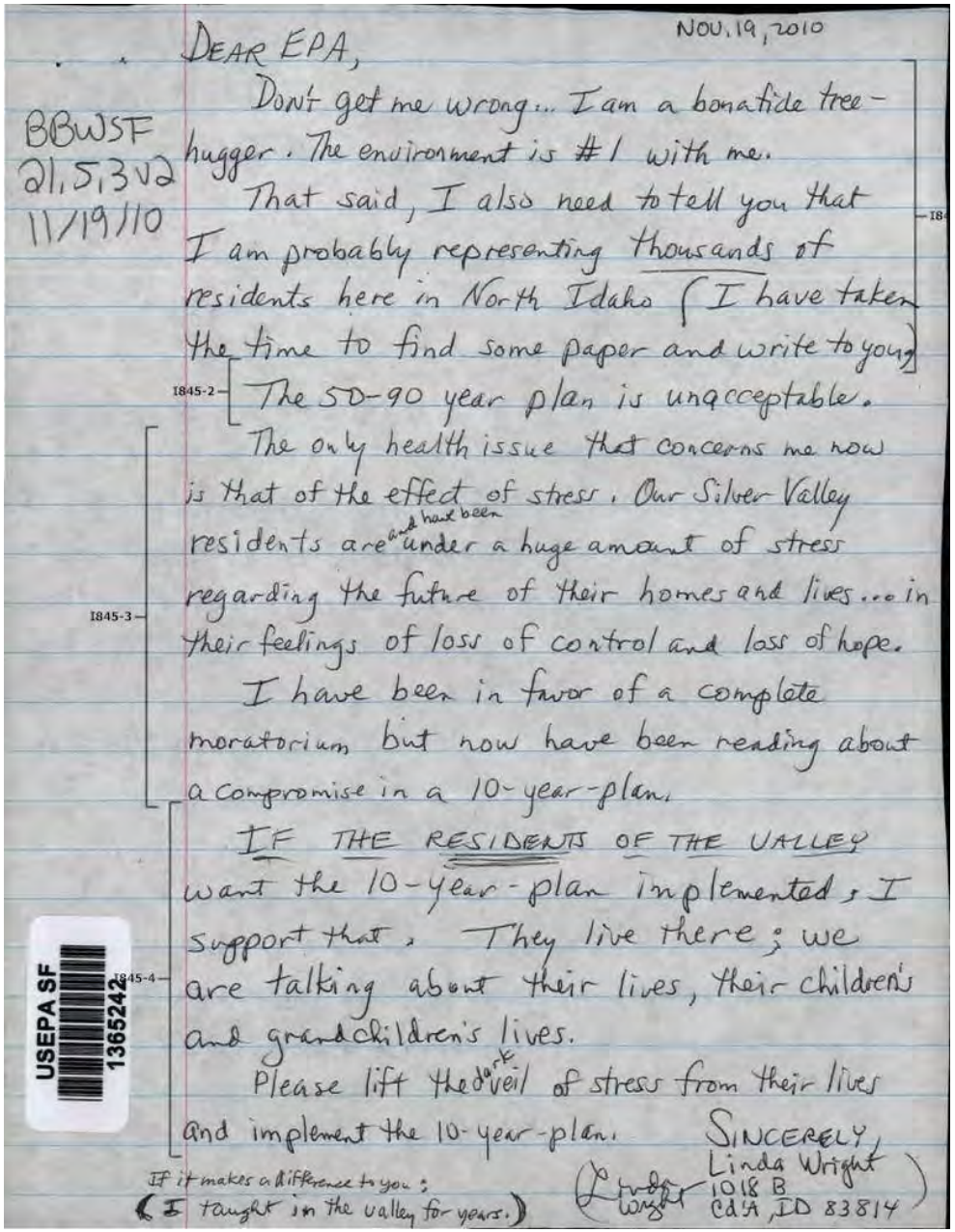
Response to comment I438-2

EPA is required under CERCLA, the Superfund law, to address risks to human health and the environment at the Bunker Hill Superfund Site. While significant cleanup has taken place in the Upper Basin, there is still contamination in soil, sediments, groundwater, and surface water that poses risks to people, wildlife, and the environment. The levels of contamination significantly exceed acceptable state and site-specific water quality standards. See response to Comment No. LC33-8 regarding background metals concentrations in the Coeur d'Alene Basin.

Response to comment I438-3

See response to Comment No. I54-8.

Wright, Linda, I845, Letter 1365242



NOV. 19, 2010

DEAR EPA,

BBWSF
21,5,3v2
11/19/10

Dont get me wrong... I am a bonafide tree-hugger. The environment is #1 with me.

That said, I also need to tell you that I am probably representing thousands of residents here in North Idaho (I have taken the time to find some paper and write to you)

I845-2 The 50-90 year plan is unacceptable.

The only health issue that concerns me now is that of the effect of stress. Our Silver Valley residents are and have been under a huge amount of stress regarding the future of their homes and lives... in their feelings of loss of control and loss of hope.

I845-3

I have been in favor of a complete moratorium but now have been reading about a compromise in a 10-year-plan.

IF THE RESIDENTS OF THE VALLEY want the 10-year-plan implemented, I support that. They live there; we are talking about their lives, their children's and grandchildren's lives.

I845-4

Please lift the dark veil of stress from their lives and implement the 10-year-plan.

SINCERELY,
Linda Wright
1018 B
CdA, ID 83814

If it makes a difference to you:
(I taught in the valley for years.)

USEPA SF 1365242

Response to comment I845-1
Thank you for your comment.

Response to comment I845-2
See response to Comment No. I58-1.

Response to comment I845-3
Thank you for your comment. See response to Comment No. I474-2.

Response to comment I845-4
See response to Comment No. I474-2.

Wright, Linda, I267, Letter 616015-31

of the meeting. Steve Allred said, "Basically science doesn't matter." Of course that ticked us all off because that's what we are. His point was it is mostly political, but I'd like to submit something tonight that maybe we haven't heard and it is from a scientific point of view. Years ago, our river right out here, the South Fork, was designated for water biota, Gold Book stand. That was also done through the EPA study, at the [Hale fish lab] for using, in my book, bogus water because they cooked it on the site. They didn't use real water from the river. They used nitrate and zinc, which [bile up] takes in the fish much more regularly than our native zinc. What I would submit is that the state of Idaho and our DEQs supposed to be working for us, asked for that study be revisited and look at site-specific criteria and see what our standards really are. They think our goals are totally off. We're trying to read something that really is impossible. EPA knows it. So if we could force that restudy, cite specific standards and the kind that Montana did, and I don't think there's a person in this room that would not support returning the river to its original condition, nothing better. Thank you.

Linda Wright: I live in Coeur d'Alene. I returned to Pinehurst in the 80s and 90s and I attended Wednesday's meeting in Smelterville for the fact finding mission. I've read and heard several times that night that public health is number one for the EPA. As I watched that meeting and all the residents and the stress level in that room, if public health is indeed number one, there it is. You're just going to have to back off because it's stress. Stress kills. We know that [laughter]. I did some research on it at the American Medical Association and the American Psychological I267-1 – Association. Both said that we all know that chronic emotional stress has negative impacts on our health. Chronic stress - and these people have been through this for years and years and years - it compromises the immune system and can cause major damage to health. It also reports really interestingly that stress is a control issue; all about the subjective response to loss of control. The people here feel they have lost control, that there is no way they can regain the control of their valley and their lives. Like I said, if indeed public health is number one for the EPA, it has to back off.

Civicom—Lower Cost, More Convenient Communications
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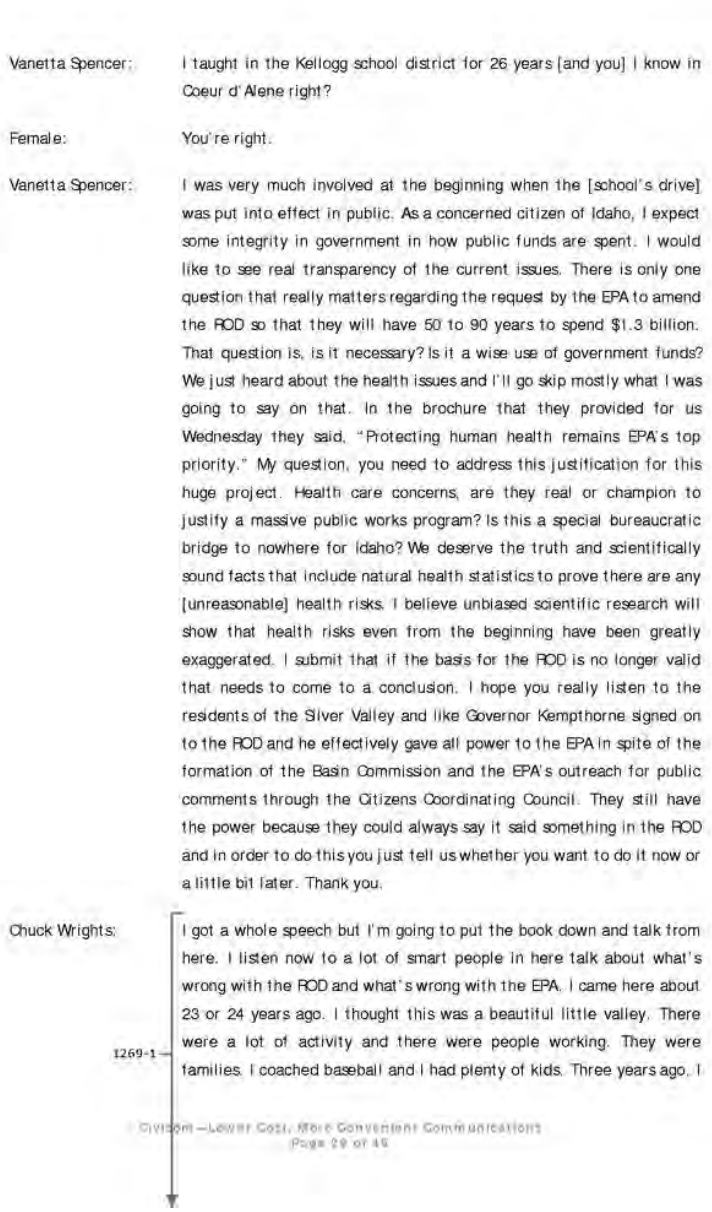
Response to comment I267-1

Although human health is the highest priority, EPA is also required to address the unacceptable risks to the environment that still exist. See responses to Comment Nos. I295-1 and I58-1.

Wrights, Chuck, I269, Letter 616015-33



Vanetta Spencer: I taught in the Kellogg school district for 26 years [and you] I know in Coeur d' Alene right?

Female: You're right.

Vanetta Spencer: I was very much involved at the beginning when the [school's drive] was put into effect in public. As a concerned citizen of Idaho, I expect some integrity in government in how public funds are spent. I would like to see real transparency of the current issues. There is only one question that really matters regarding the request by the EPA to amend the ROD so that they will have 50 to 90 years to spend $1.3 billion. That question is, is it necessary? Is it a wise use of government funds? We just heard about the health issues and I'll go skip mostly what I was going to say on that. In the brochure that they provided for us Wednesday they said, "Protecting human health remains EPA's top priority." My question, you need to address this justification for this huge project. Health care concerns, are they real or champion to justify a massive public works program? Is this a special bureaucratic bridge to nowhere for Idaho? We deserve the truth and scientifically sound facts that include natural health statistics to prove there are any [unreasonable] health risks. I believe unbiased scientific research will show that health risks even from the beginning have been greatly exaggerated. I submit that if the basis for the ROD is no longer valid that needs to come to a conclusion. I hope you really listen to the residents of the Silver Valley and like Governor Kempthorne signed on to the ROD and he effectively gave all power to the EPA in spite of the formation of the Basin Commission and the EPA's outreach for public comments through the Citizens Coordinating Council. They still have the power because they could always say it said something in the ROD and in order to do this you just tell us whether you want to do it now or a little bit later. Thank you.

Chuck Wrights: I got a whole speech but I'm going to put the book down and talk from here. I listen now to a lot of smart people in here talk about what's wrong with the ROD and what's wrong with the EPA. I came here about 23 or 24 years ago. I thought this was a beautiful little valley. There were a lot of activity and there were people working. They were families. I coached baseball and I had plenty of kids. Three years ago, I

I269-1

Division—Lower Cost, More Convenient Communications
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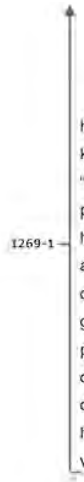
Response to comment I269-1

See response to Comment No. I295-1.



had to give up coaching baseball. You know why? We didn't have any kids. The EPA ran them out of this valley. They scared so many people. "Oh, there's lead in the water. Don't walk here. Don't step off the path." They told so many visitors that we lost some people coming in here to visit our land. Well, I kind of got sick and tired of that. I'm sick and tired of it now. A lot of people think that we could get another 90 days. I got something to read to you. "We're pretty well fed up gentlemen. Now while I don't speak for all the so-called lead-retarded people in this valley [laughter], I sure echo a lot of thinking ones. We don't want them. We don't need them. Thank you for what you've done. It's a very nice-looking valley now but you haven't solved any health problem, because there wasn't any? Don't forget, retarded votes count [laughter] and vote this year."

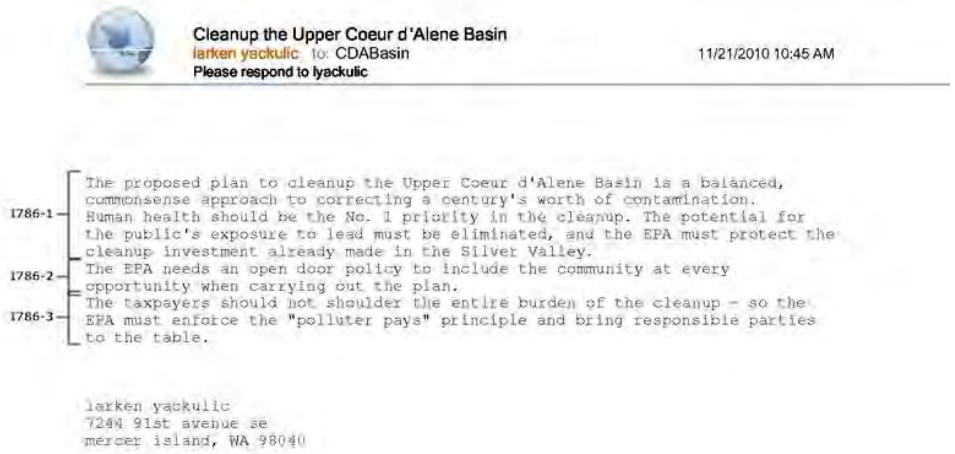
I269-1

Jane Higdem: I'm Jane Higdem. I'm the national president of Women in Mining; 170 women. I'm also one of three Republican delegates for legislative district two, covering five counties. I also own business, some clothing made with pure silver and that I recently, due to lack of sales and my suppliers going out of business, I had to fire myself. Most of the topics that I will be covering tonight will be – I want to hit on the issue of basically the EPA making up its own rules and changing them as they feel. The EPA has limits on the maximum [mineral] contamination that they can discharge. If it's over by some little fraction like .1, they assess a fine to the mining company. If it's over by .2 they assess a fine. They don't have that I can find anywhere, any guidelines or standards for how much does this charge –how much this .1, how much that would cost the company or this. They just kind of make it up as they go and if you don't like it then you can argue it and spend lots of lawyer money, but basically not friendly to mining. If they say they are, how can a mine company stay alive when they fine them to death? Thank you.

Steve Petroni: Good evening. My name is Steve Petroni. I'm Hecla's Silver Valley exploration manager. I'd like to thank the panel for allowing me to present my views tonight. My comments this evening focus on portions of the plan that makes me most nervous about the future of exploration in mining in the Silver Valley. In EPA's cover letter in the proposed plan, they stated and I quote. "EPA has worked with Hecla

No Comments

Yackulic, Lauren, I786, Letter 618787



Cleanup the Upper Coeur d'Alene Basin
larken yackulic to: CDABasin 11/21/2010 10:45 AM
Please respond to lyackulic

I786-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I786-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan.

I786-3 The taxpayers should not shoulder the entire burden of the cleanup – so the EPA must enforce the "polluter pays" principle and bring responsible parties to the table.

larken yackulic
7244 91st avenue se
mercer island, WA 98040

618787

Response to comment I786-1

See response to Comment No. I295-1.

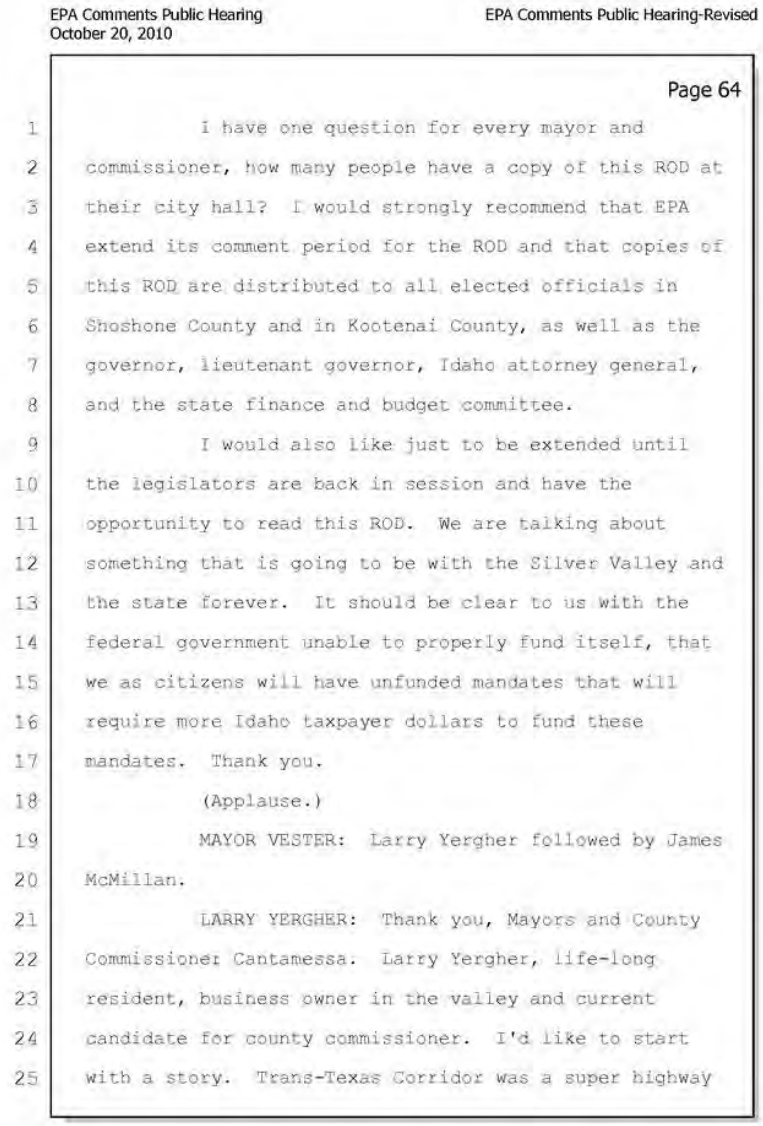
Response to comment I786-2

See response to Comment No. I295-2.

Response to comment I786-3

See response to Comment No. I295-3.

Yergher, Larry, I892, Letter 619651-25



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I have one question for every mayor and commissioner, how many people have a copy of this ROD at their city hall? I would strongly recommend that EPA extend its comment period for the ROD and that copies of this ROD are distributed to all elected officials in Shoshone County and in Kootenai County, as well as the governor, lieutenant governor, Idaho attorney general, and the state finance and budget committee.

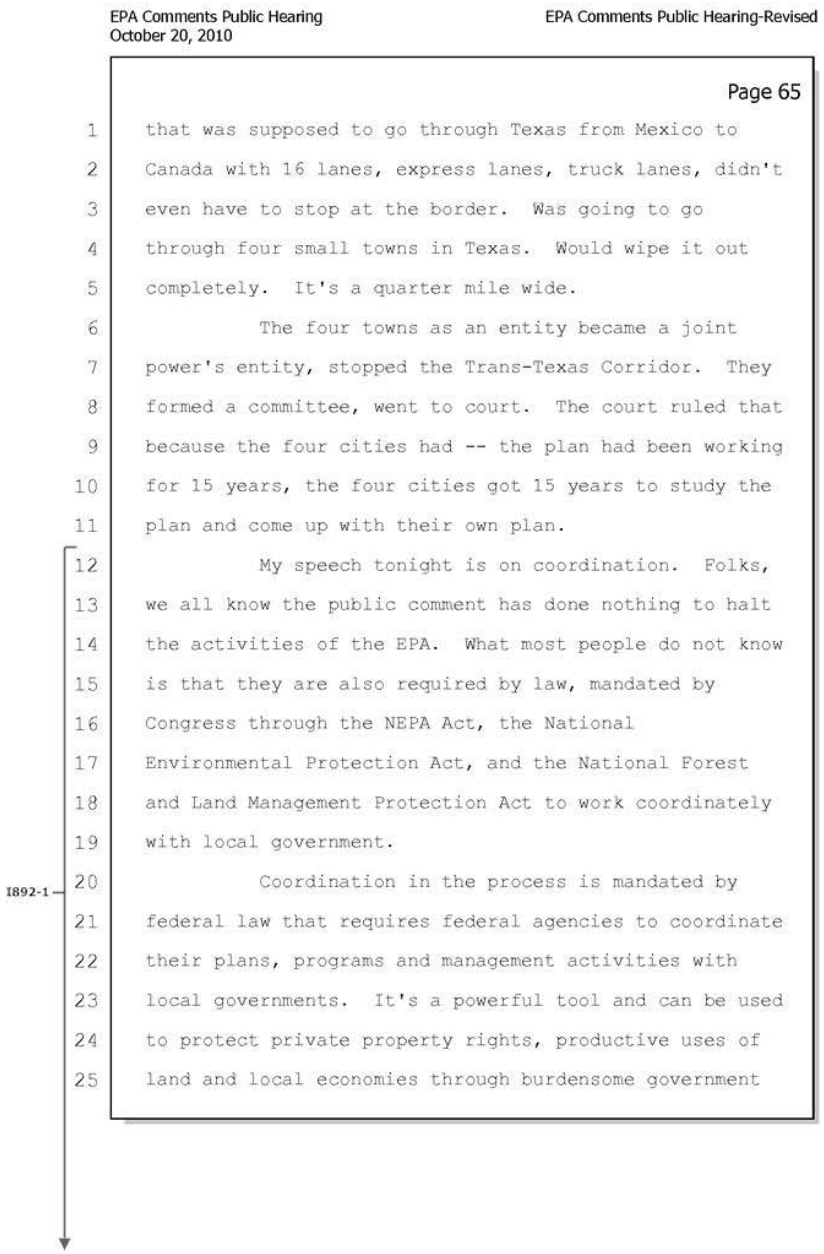
I would also like just to be extended until the legislators are back in session and have the opportunity to read this ROD. We are talking about something that is going to be with the Silver Valley and the state forever. It should be clear to us with the federal government unable to properly fund itself, that we as citizens will have unfunded mandates that will require more Idaho taxpayer dollars to fund these mandates. Thank you.

(Applause.)

MAYOR VESTER: Larry Yergher followed by James McMillan.

LARRY YERGHER: Thank you, Mayors and County Commissioner Cantamessa. Larry Yergher, life-long resident, business owner in the valley and current candidate for county commissioner. I'd like to start with a story. Trans-Texas Corridor was a super highway

No comments



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that was supposed to go through Texas from Mexico to Canada with 16 lanes, express lanes, truck lanes, didn't even have to stop at the border. Was going to go through four small towns in Texas. Would wipe it out completely. It's a quarter mile wide.

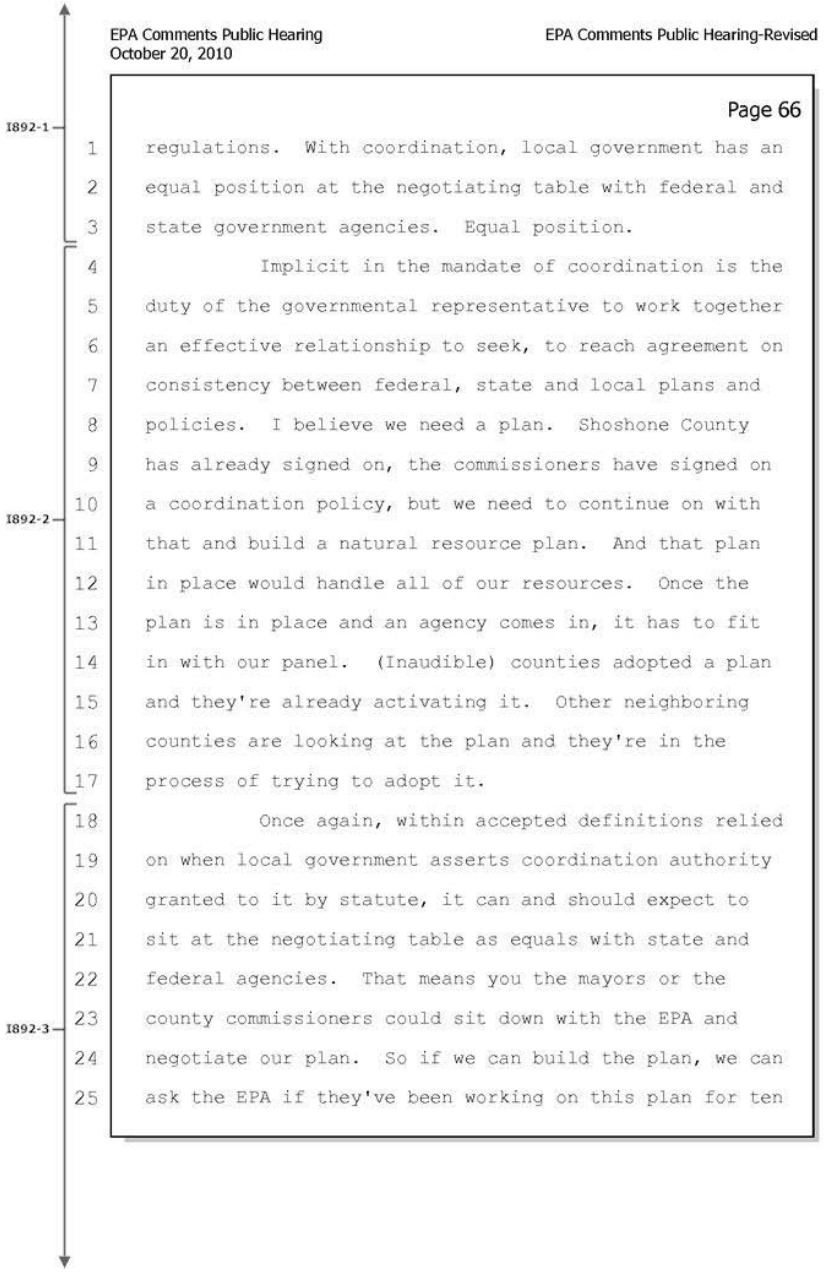
The four towns as an entity became a joint power's entity, stopped the Trans-Texas Corridor. They formed a committee, went to court. The court ruled that because the four cities had -- the plan had been working for 15 years, the four cities got 15 years to study the plan and come up with their own plan.

My speech tonight is on coordination. Folks, we all know the public comment has done nothing to halt the activities of the EPA. What most people do not know is that they are also required by law, mandated by Congress through the NEPA Act, the National Environmental Protection Act, and the National Forest and Land Management Protection Act to work coordinately with local government.

I892-1 — Coordination in the process is mandated by federal law that requires federal agencies to coordinate their plans, programs and management activities with local governments. It's a powerful tool and can be used to protect private property rights, productive uses of land and local economies through burdensome government

Response to comment I892-1

The comment raises issues regarding whether EPA satisfied National Environmental Policy Act (NEPA) requirements. For CERCLA response actions, EPA is exempted from the procedural requirements of environmental laws, including. CERCLA Section 121 (d)(2)(A) addresses the applicability of other environmental laws through applicable or relevant and appropriate requirements (ARARs). The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) interprets this to require compliance only with substantive, not procedural, aspects of ARARs. Because NEPA requirements are procedural, NEPA is not an ARAR for CERCLA response actions. EPA procedures or environmental reviews under CERCLA enabling legislation are functionally equivalent to the NEPA process and thus, exempt from the procedural requirements in NEPA. CERCLA addresses the two basic objectives of NEPA: (1) the agency should consider significant environmental impacts of the proposed action, and (2) relevant environmental information should be made available to the public, which allows the public to play a role in the agency's decision-making process and implementation of the decision. The administrative record EPA developed in support of the Selected Remedy documents that EPA, by following the requirements of the NCP, conducted a remedy selection process that was the functional equivalent of NEPA. See also responses to Comment Nos. I295-2 and LJ39-5.



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I892-1

regulations. With coordination, local government has an equal position at the negotiating table with federal and state government agencies. Equal position.

Implicit in the mandate of coordination is the duty of the governmental representative to work together an effective relationship to seek, to reach agreement on consistency between federal, state and local plans and policies. I believe we need a plan. Shoshone County has already signed on, the commissioners have signed on a coordination policy, but we need to continue on with

I892-2

that and build a natural resource plan. And that plan in place would handle all of our resources. Once the plan is in place and an agency comes in, it has to fit in with our panel. (Inaudible) counties adopted a plan and they're already activating it. Other neighboring counties are looking at the plan and they're in the process of trying to adopt it.

Once again, within accepted definitions relied on when local government asserts coordination authority granted to it by statute, it can and should expect to sit at the negotiating table as equals with state and federal agencies. That means you the mayors or the

I892-3

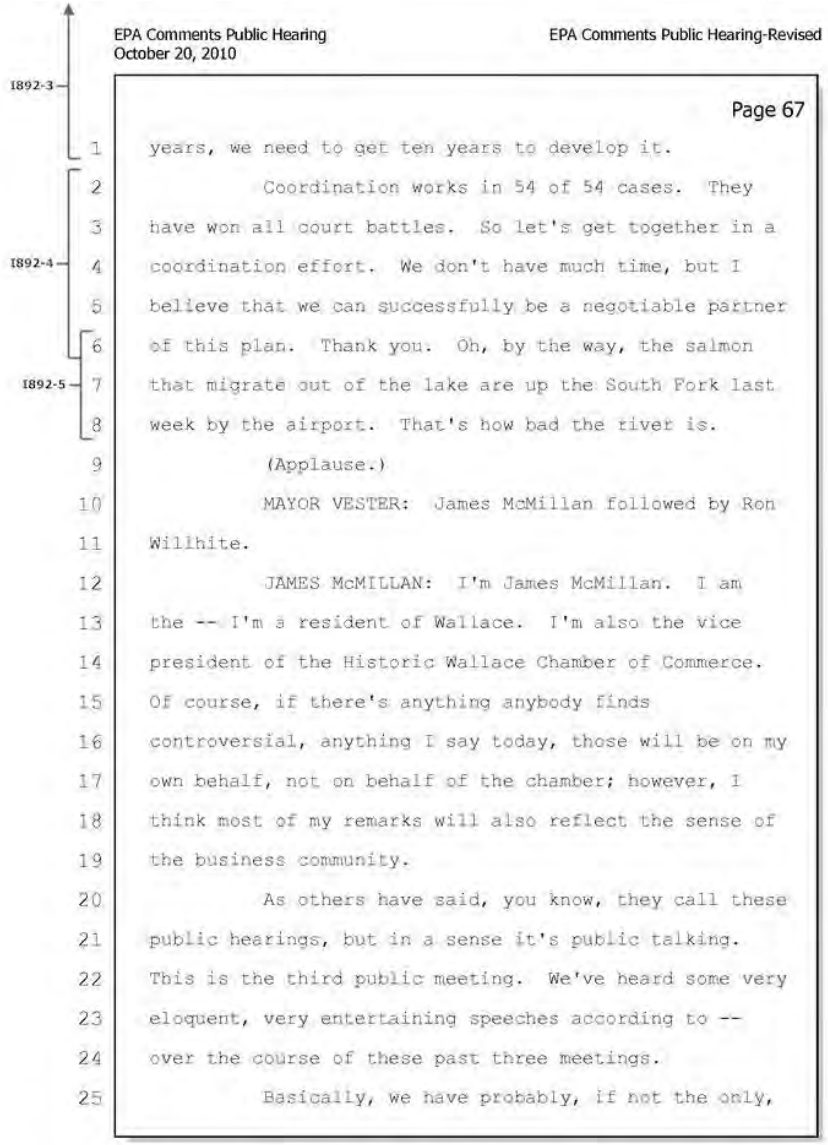
county commissioners could sit down with the EPA and negotiate our plan. So if we can build the plan, we can ask the EPA if they've been working on this plan for ten

Response to comment I892-2

Thank you for your comment.

Response to comment I892-3

CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) include robust public participation requirements. However, neither requires the type of coordination suggested by the commenter. Nevertheless, EPA has gone well beyond the public participation requirements of CERCLA and the NCP in its efforts to engage the public in the remedy selection process that proceeded the ROD Amendment. See responses to Comment Nos. I295-2, LJ39-5, and I54-6.



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I892-3

years, we need to get ten years to develop it.

Coordination works in 54 of 54 cases. They have won all court battles. So let's get together in a coordination effort. We don't have much time, but I believe that we can successfully be a negotiable partner of this plan. Thank you. Oh, by the way, the salmon that migrate out of the lake are up the South Fork last week by the airport. That's how bad the river is.

I892-4

I892-5

(Applause.)

MAYOR VESTER: James McMillan followed by Ron Willhite.

JAMES McMILLAN: I'm James McMillan. I am the -- I'm a resident of Wallace. I'm also the vice president of the Historic Wallace Chamber of Commerce. Of course, if there's anything anybody finds controversial, anything I say today, those will be on my own behalf, not on behalf of the chamber; however, I think most of my remarks will also reflect the sense of the business community.

As others have said, you know, they call these public hearings, but in a sense it's public talking. This is the third public meeting. We've heard some very eloquent, very entertaining speeches according to -- over the course of these past three meetings.

Basically, we have probably, if not the only,

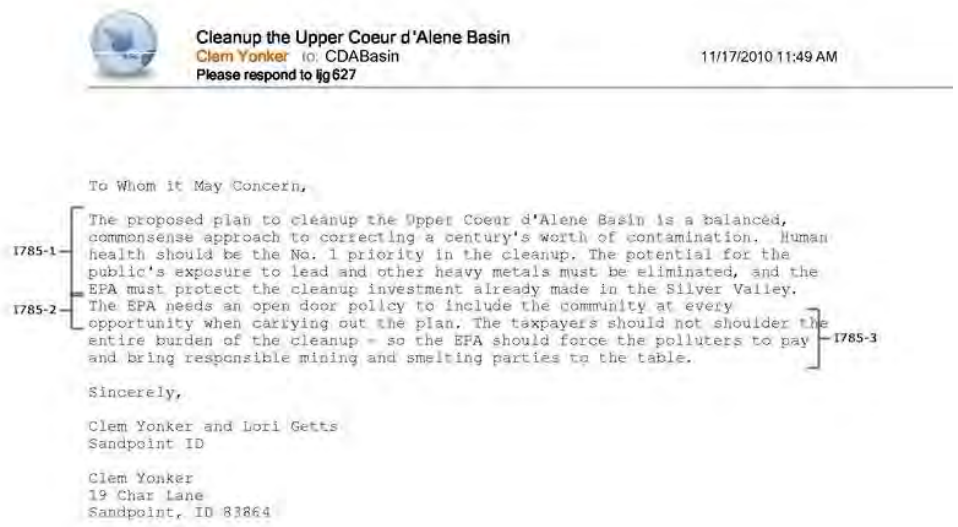
Response to comment I892-4

Thank you for your comment. See also response to Comment No. I295-2.

Response to comment I892-5

Comment noted.

Yonker, Clem, I785, Letter 618786



Cleanup the Upper Coeur d'Alene Basin
Clem Yonker to: CDABasin 11/17/2010 11:49 AM
Please respond to ljg627

To Whom it May Concern,

I785-1 The proposed plan to cleanup the Upper Coeur d'Alene Basin is a balanced, commonsense approach to correcting a century's worth of contamination. Human health should be the No. 1 priority in the cleanup. The potential for the public's exposure to lead and other heavy metals must be eliminated, and the EPA must protect the cleanup investment already made in the Silver Valley.

I785-2 The EPA needs an open door policy to include the community at every opportunity when carrying out the plan. The taxpayers should not shoulder the entire burden of the cleanup - so the EPA should force the polluters to pay and bring responsible mining and smelting parties to the table. I785-3

Sincerely,

Clem Yonker and Lori Getts
Sandpoint ID

Clem Yonker
19 Char Lane
Sandpoint, ID 83864

618786

Response to comment I785-1

See response to Comment No. I295-1.

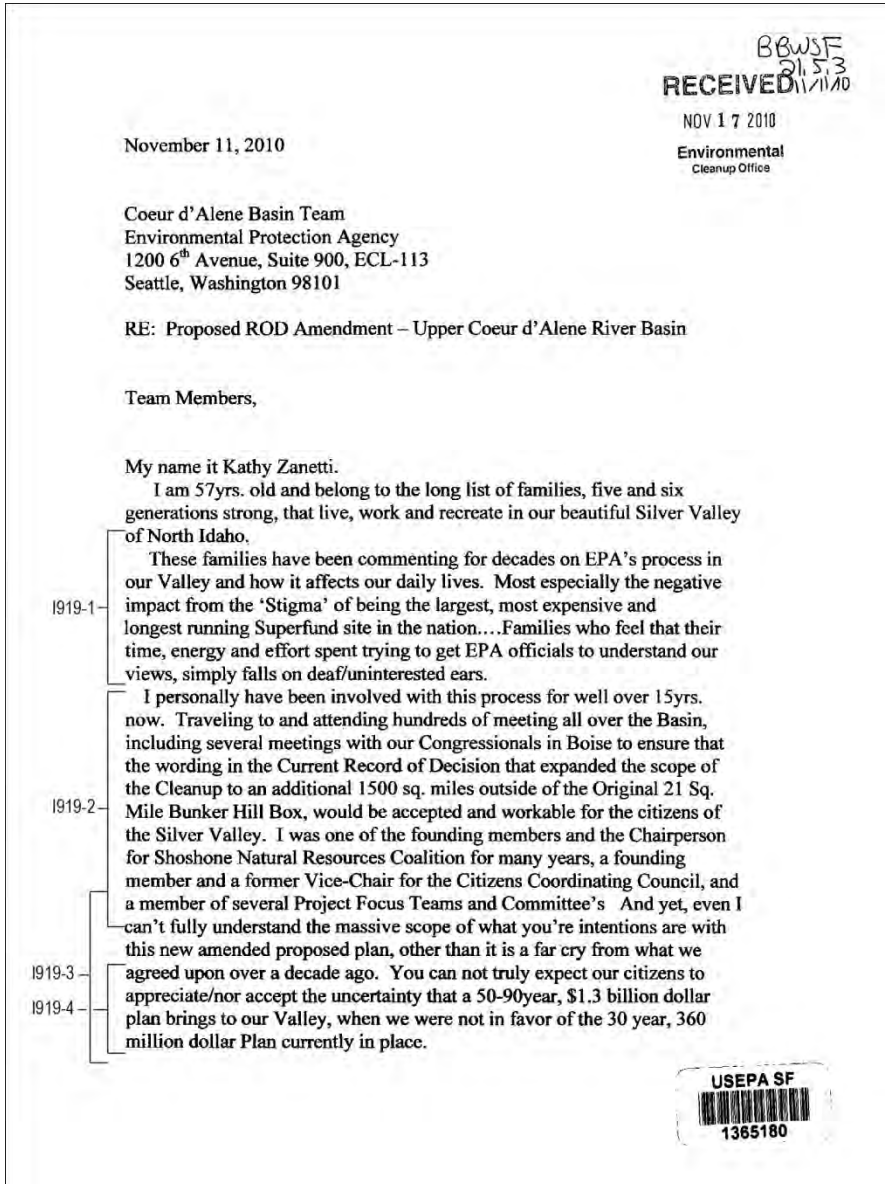
Response to comment I785-2

See response to Comment No. I295-2.

Response to comment I785-3

See response to Comment No. I295-3.

Zanetti, Kathy, I919, Letter 1365180



BBWSF
21.53
11/11/10
RECEIVED
NOV 17 2010
Environmental
Cleanup Office

November 11, 2010

Coeur d'Alene Basin Team
Environmental Protection Agency
1200 6th Avenue, Suite 900, ECL-113
Seattle, Washington 98101

RE: Proposed ROD Amendment – Upper Coeur d'Alene River Basin

Team Members,

My name it Kathy Zanetti.

I am 57yrs. old and belong to the long list of families, five and six generations strong, that live, work and recreate in our beautiful Silver Valley of North Idaho.

I919-1 These families have been commenting for decades on EPA's process in our Valley and how it affects our daily lives. Most especially the negative impact from the 'Stigma' of being the largest, most expensive and longest running Superfund site in the nation.…Families who feel that their time, energy and effort spent trying to get EPA officials to understand our views, simply falls on deaf/uninterested ears.

I919-2 I personally have been involved with this process for well over 15yrs. now. Traveling to and attending hundreds of meeting all over the Basin, including several meetings with our Congressionals in Boise to ensure that the wording in the Current Record of Decision that expanded the scope of the Cleanup to an additional 1500 sq. miles outside of the Original 21 Sq. Mile Bunker Hill Box, would be accepted and workable for the citizens of the Silver Valley. I was one of the founding members and the Chairperson for Shoshone Natural Resources Coalition for many years, a founding member and a former Vice-Chair for the Citizens Coordinating Council, and a member of several Project Focus Teams and Committee's And yet, even I can't fully understand the massive scope of what you're intentions are with this new amended proposed plan, other than it is a far cry from what we

I919-3 agreed upon over a decade ago. You can not truly expect our citizens to

I919-4 appreciate/nor accept the uncertainty that a 50-90year, $1.3 billion dollar plan brings to our Valley, when we were not in favor of the 30 year, 360 million dollar Plan currently in place.

USEPA SF
1365180

Response to comment I919-1

See response to Comment No. I474-1. EPA, as a federal agency, is obligated to make sound scientific decisions. EPA is dedicated to its mission and mandate to protect people's health and the environment, even if our actions are unpopular. EPA takes public input seriously and always considers the information and comments provided by citizens. EPA may, at times, make decisions that some people do not agree with. This does not mean that the agency is not listening to concerns or is carelessly disregarding public input. In these instances, the agency is listening but has not heard or seen information which would cause a change in conclusions. In the case of this cleanup plan, EPA has made many significant changes in response to public comments.

Response to comment I919-2

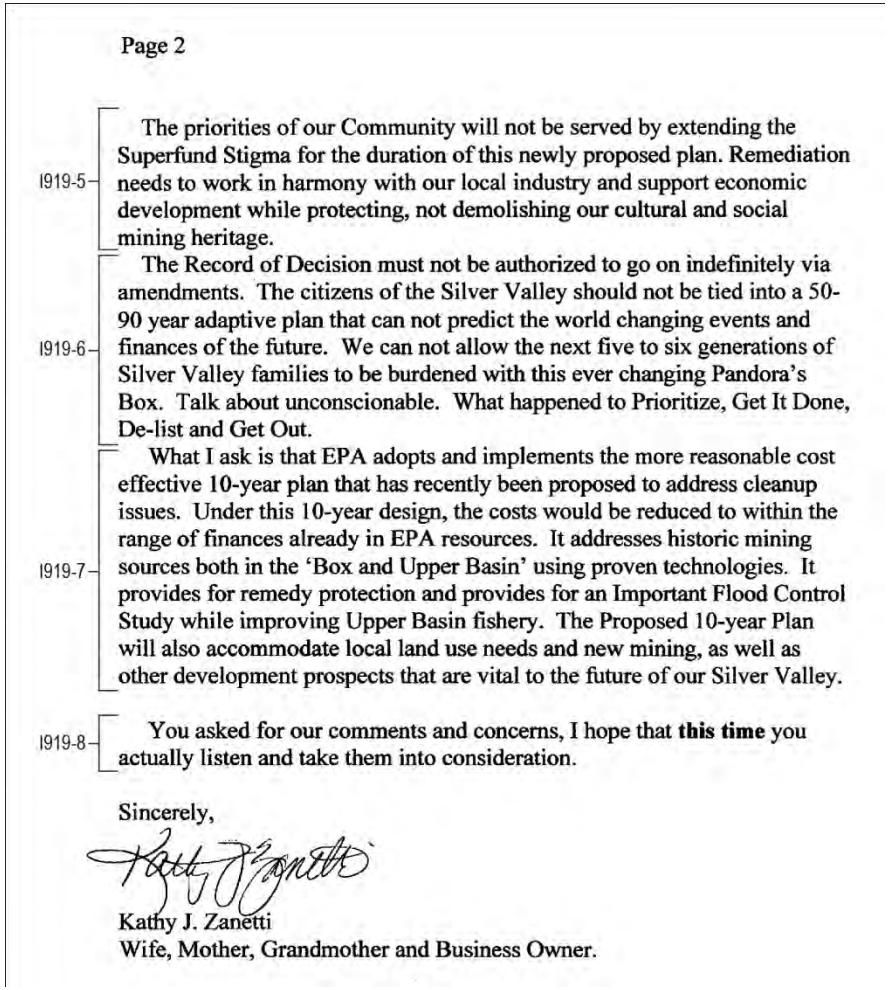
Thank you for your comment.

Response to comment I919-3

See responses to Comment Nos. I58-1 and I58-2.

Response to comment I919-4

See responses to Comment Nos. I58-1 and I58-2.



Page 2

I919-5 The priorities of our Community will not be served by extending the Superfund Stigma for the duration of this newly proposed plan. Remediation needs to work in harmony with our local industry and support economic development while protecting, not demolishing our cultural and social mining heritage.

I919-6 The Record of Decision must not be authorized to go on indefinitely via amendments. The citizens of the Silver Valley should not be tied into a 50-90 year adaptive plan that can not predict the world changing events and finances of the future. We can not allow the next five to six generations of Silver Valley families to be burdened with this ever changing Pandora's Box. Talk about unconscionable. What happened to Prioritize, Get It Done, De-list and Get Out.

I919-7 What I ask is that EPA adopts and implements the more reasonable cost effective 10-year plan that has recently been proposed to address cleanup issues. Under this 10-year design, the costs would be reduced to within the range of finances already in EPA resources. It addresses historic mining sources both in the 'Box and Upper Basin' using proven technologies. It provides for remedy protection and provides for an Important Flood Control Study while improving Upper Basin fishery. The Proposed 10-year Plan will also accommodate local land use needs and new mining, as well as other development prospects that are vital to the future of our Silver Valley.

I919-8 You asked for our comments and concerns, I hope that **this time** you actually listen and take them into consideration.

Sincerely,

Kathy J. Zanetti
Wife, Mother, Grandmother and Business Owner.

Response to comment I919-5

See responses to Comment Nos. I54-2, I58-5, and I822-11.

Response to comment I919-6

See responses to Comment Nos. I58-1 and I58-4.

Response to comment I919-7

See response to Comment No. I474-2.

Response to comment I919-8

See response to Comment No. I295-2.

Zastrow, Deborah, I439, Letter 616343

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin
deborah1@cableone.net to: formsubmission 11/14/2010 09:23 AM
Sent by: Deborah1@Cableone.Net <deborah1=cableone.net

EPA Coeur d'Alene Basin Team
1200 6th Avenue
Suite 900
ECL-113
Seattle, WA 98101

RE: Proposed Record of Decision Amendment - Upper Coeur d'Alene River Basin

To Whom It May Concern:

From: Deborah Zastrow
Date: 11/14/2010
Brief Overview: EPA's proposed plan will cost approximately $1.3 billion in today's dollars and take 50-90 years to implement. This plan is flawed for a number of reasons.
I439-1 My Concerns: Economic Impacts -- The plan will have a negative impact on development in the Silver Valley, Legislative Oversight -- This plan has not been reviewed by the Idaho Legislature, Cost -- The EPA plan will cost too much. ($1.3 billion in today's dollars), Mining and Land Use -- This plan gives the EPA far too much control over the future of the Silver Valley, States' Rights -- EPA is a federal agency, but Idaho water belongs to the state, National Academy of Sciences -- This plan is based on a flawed model and ignores many NAS recommendations
Additional Comments: I support the 10-Year Planning approach as presented by Citizens for a Prosperous Silver Valley.
I like the idea that we could mine the area for metals used in communication technology and avoid buying these metals from China.
I439-2 I would like to keep this an Idaho project, not a Federal Government project which would end up being botched.
Coeur d'Alene Basin Resident: No
Email Address: deborah1@cableone.net
Mailing Address: 2922 W. Timber Ct, 2922 W. Timber Ct.|Eagle|Idaho|83616|US
Phone Number: (208) 938-9904

616343

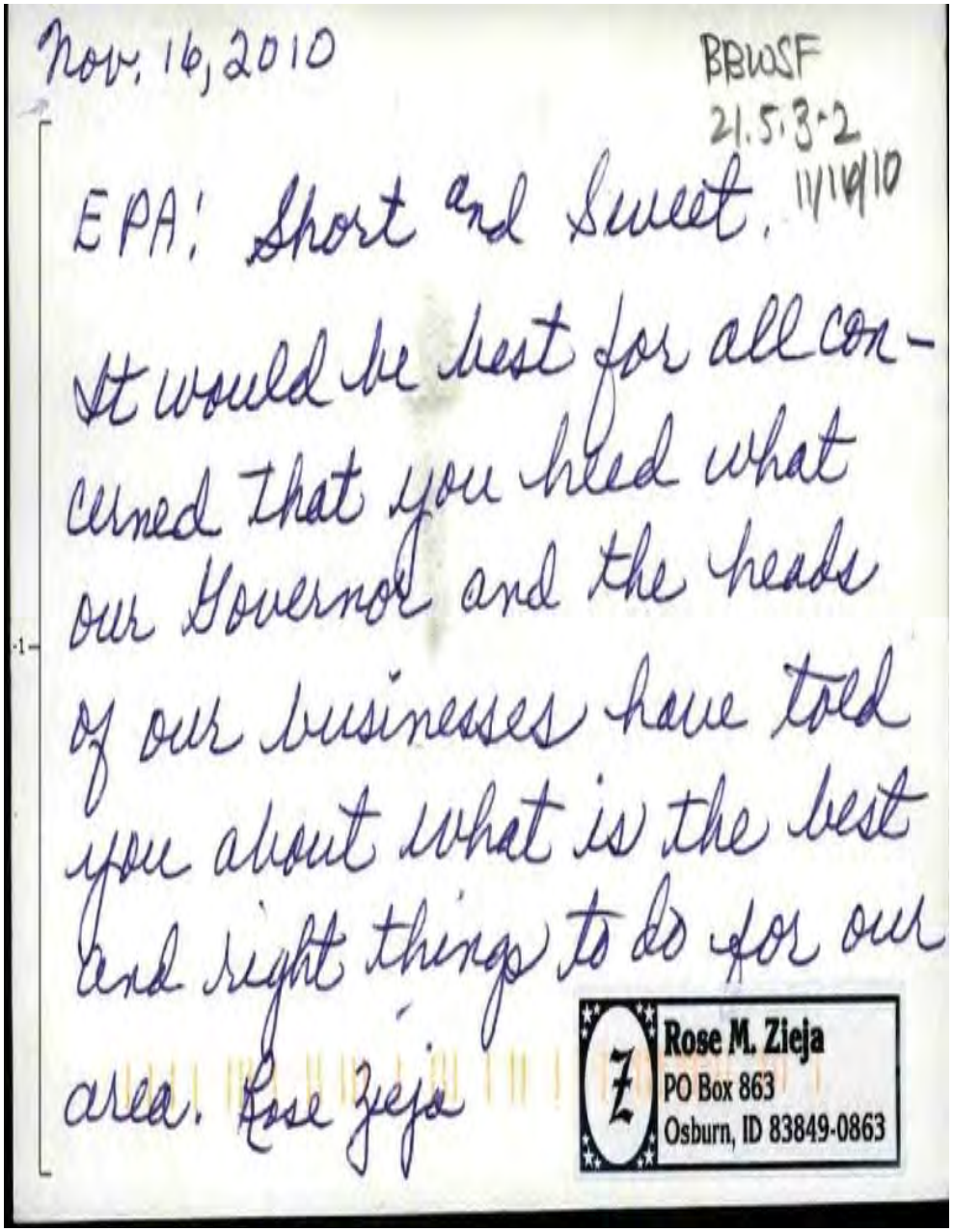
Response to comment I439-1

See responses to Comment Nos. I54-2, LJ39-5, I58-2, LJ27-8, and I474-2.

Response to comment I439-2

Comment noted.

Zieja, Rose, I871, Letter 1395021



Nov. 16, 2010

BBWSF
21.5.3-2
11/19/10

EPA: Short and Sweet.

It would be best for all con-
cerned that you heed what
our Governor and the heads
of our businesses have told
you about what is the best
and right things to do for our
area. Rose Zieja

Rose M. Zieja
PO Box 863
Osburn, ID 83849-0863

Response to comment I871-1
Thank you for your comment.