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## **Page Repository: Wedge Expansion Frequently Asked Questions**

The Page Repository is about to expand. Work begins on the “Wedge Expansion” in earnest this September. The Wedge Expansion will fill about 1.6 acres of a historic tailings impoundment that has developed into wetlands. The agencies are complying with Clean Water Act requirements. The agencies will do *mitigation for wetland values lost as a result of the expansion*. That means they will re-create and relocate wetland values that are lost because of the work.

The agencies are taking steps to inform people about plans at the repository because expansion of the existing repository will fill wetlands and because required wetland mitigation will be met by buying into a wetlands trust outside the Coeur d’Alene River valley. We know that some residents have strong opinions about the repositories. The agencies want to hear about and respond to the community’s questions, and hear ideas about how we can improve expansion of this site. This document can help you learn more about the Page Repository Wedge Expansion.

### **Why expand the Page Repository?**

The existing footprint of the Page Repository has reached its design capacity—it’s filling up. The repository is used for disposal of contaminated soils excavated from within the local community. The waste comes from land development, public infrastructure repairs and maintenance, and from excavations at private properties. These projects are required by law to have safe disposal of the contaminated soils. The soils must be carefully contained and managed. Without this expansion, development would slow down and people would face far higher disposal costs.

DEQ and EPA have state and federal mandates to clean up mine wastes in the Bunker Hill Superfund Site. The agencies began this cleanup with local partners over 20 years ago due to a public health crisis involving hundreds of children and families with high blood lead levels. The cleanup has resulted in major reductions in blood lead levels. To keep clean areas clean, the contamination needs to be securely contained, away from people, in repositories.

### **Why is it called the “Wedge Expansion” and how big will it be?**

If you look at the maps of the expansion, you’ll see it has the shape of a wedge in the southwest corner of the existing repository. The 1.6 acre expansion will be about 30 feet tall, matching the elevation of the existing repository.

### **How big is Page Repository now and how much waste is in it?**

The existing Page Repository covers about 18 acres. It holds about 1,000,000 cubic yards of wastes that came from cleanups in the Bunker Hill Box.

### **Why not just find a new spot for a repository?**

The agencies and the Upstream Mining Group have been looking for a new location for a repository in the Bunker Hill Box. Options have been evaluated based on: 1) protectiveness of human health and the environment; 2) convenience for use by local contractors and home owners; and 3) costs to develop, operate, and maintain. So far, sites that have been considered are locations that could be developed for other purposes, would be very costly to develop, or would take a long time to bring into operation. The Page site has already been developed, is controlled by the State, and may continue operation without interrupting local development, community infrastructure development, or maintenance.

### **Why do we even need repositories?**

Metals contaminants in the Bunker Hill Box are a health risk to the community. To reduce risk, the Institutional Controls Program (ICP) was set up to make sure that contaminated soils are properly managed. Repositories are one way to manage risk. (There are others, such as installing “barriers” like parking lots over the top of the contamination.) Repositories help to reduce the footprint of contamination by consolidating ICP wastes and waste soil from cleanup activities.

### **Why was there no formal public comment period on this Wedge Expansion?**

No formal public comment period is required for design or expansion of the Page Repository. The wedge expansion work is happening under a 1992 Record of Decision for the Non-Populated Areas of the Box and a 1994 Consent Decree entered into by EPA, DEQ, and several mining companies.

Even so, the agencies want citizens to be informed, and have opportunities to share their thoughts and get their questions answered. That is why the agencies are offering an open house (September 9, 2009), maintaining a web page, and sending out regular updates about Page Repository. The agencies have also been meeting regularly with the local Bunker Hill Task Force, getting community input on Page Repository plans over several years. Citizens, local mayors and other local officials, and staff from the Economic Development Association attend those meetings. Even though work at Page Repository is a small expansion of an existing facility, the agencies welcome questions and suggestions from the public.

### **Why are the Wedge Expansion design documents so much briefer than for the East Mission Flats (EMF) Repository?**

The design documents for each of the facilities are quite different. The Wedge Expansion design documents are more brief because it's an expansion of an existing site, not placement of a new repository. The Wedge Expansion involves a much smaller area and will contain much less waste. And, the Wedge Expansion will use engineering designs and practices that are already in place at the Page Repository. The process to design a whole new repository at EMF required a more detailed and complicated technical process to create an entirely new facility from scratch, so its design document was larger. In addition, the EMF Repository had a formal comment period on its design because the agencies were choosing a new site and designing an entirely new repository.

### **Why can't you just keep piling wastes on top of the existing repository?**

"Piling on" has been considered as an alternative. However, the South Fork Sewer District, which owns most of the existing repository, would like to limit the height of the repository to its existing height. This preserves the Sewer District's ability to use the repository as part of its operations in the future. Future uses by the Sewer District may include development of "drying bins" or land application areas, and would require flat ground at the same elevation as existing facilities for the future expansion. As good stewards of the Sewer District's property, the agencies have decided to close out the existing repository and return the surface to a condition that is useful for the Sewer District's future uses.

### **Why must the agencies and UMG fill 1.6 acres of wetlands to expand Page Repository? Aren't you destroying habitat?**

Wetlands will be filled by the Wedge Expansion. These wetlands developed in the last 50 years on top of Asarco's mill tailings. In addition, although the wetlands provide some values for wildlife, they also act as an "attractive" hazard -- any birds or other wildlife that come there are at risk of lead poisoning. Even so, the agencies will offset any impacts to the wetlands by participating in a wetlands mitigation bank approved by the U.S. Army Corps of Engineers (COE) and monitored by the COE and EPA.

### **What is a Wetlands Mitigation Bank?**

A mitigation bank is a wetland site created to make up for wetland losses somewhere else. That means any wetlands values lost by the wedge expansion are essentially made up by getting shares in the mitigation bank. The mitigation bank that is being used for the wedge expansion is outside the Coeur d'Alene Basin watershed. Even though it is outside of the local watershed, the mitigation bank, located in the Priest Lake area, will keep the wetland values in northern Idaho.

### **Why are the agencies and UMG mitigating for the wedge outside the Coeur d'Alene River Valley?**

The agencies and UMG are complying with a new U.S. Army Corps of Engineers and EPA regulation that requires mitigation to happen before or at the same time as the impacts to the wetlands. There are opportunities within the Basin that would enhance the local ecosystem. Unfortunately, none of these opportunities met the requirement for mitigation to happen before or at the same time as the wedge expansion.

**Why can EPA and DEQ fill wetlands when no one else can?**

Filling of wetlands is regulated by Section 404 of the Clean Water Act. EPA and DEQ are following the same regulatory requirements that any other private or public entity is required to follow.

**After the Wedge Expansion, are you going to keep expanding the Page Repository?**

We don't know yet. Continued expansion of the Page Repository is the agencies' preferred alternative for a long-term repository. Analysis by DEQ shows that continued expansion westward into the West Page Swamp is: 1) the most cost-effective alternative, 2) most easily constructed, operated, and maintained, 3) protective of human health, and 4) will have the least impact on residents. However, UMG continues to evaluate other locations, as well as "piling on" at the existing repository.

More analysis, particularly of wetland mitigation options, will be done in the next year or two before this continued-expansion alternative is presented in a 404 analysis, or another site is chosen.

**What is a Clean Water Act 404 Analysis?**

Section 404 of the federal Clean Water Act (CWA) requires any person planning work that may adversely impact "waters of the U.S.," including certain wetlands, to conduct a review of alternatives to the project. It also requires them to develop a plan to avoid, minimize, or mitigate for the adverse impacts to the wetland. UMG has conducted a review and described this work in a document titled *CWA Section 404 Analysis – Wedge Expansion of West Page Repository*. EPA, DEQ, and the U.S. Fish and Wildlife Service (FWS) have reviewed this report. The results of FWS's review are documented in a letter dated August 31, 2009. EPA is preparing to formally accept the 404 analysis.

**Will the Wedge Expansion contribute to contamination of wetlands, surface water, or groundwater?**

It is our mandate to protect the environment, and we will not conduct Superfund actions that would spread contamination. On the contrary, we are working to clean things up. The Page Repository is located on and near a former tailings pond, which consists of contaminated material from ore processing. ICP material disposed at the Page Repository is generally much less contaminated than the tailings already in this area.

ICP material will be protected from eroding and leaching into surface and groundwater. Here's how:

- External berms have been engineered and will be constructed to protect the repository from erosion and slope failures.
- A base layer of crushed concrete will be placed within the berms. The concrete will provide a stable base for repository equipment to operate and for those bringing waste into the repository. The base layer will also keep contaminated soils away from surface waters. A lot of concrete has been brought to the Page Repository recently. This concrete will be segregated and used for the wedge expansion base layer.
- The waste pile will be sloped to shed rain and snowmelt runoff. This will reduce the amount of water that seeps through the contaminated native soil. The area currently gets an average of about 32 inches of precipitation a year. Now, all of that precipitation soaks through the contaminated soil. Once the waste soil is placed over the site, the original ground surface will be shielded from precipitation. That way, only a very small amount of water will soak through the yard waste into the underlying contaminated soil.
- EPA and DEQ have installed a well system to monitor groundwater. Much of the groundwater within the Bunker Hill Superfund site is highly contaminated and cannot be used safely for drinking water. EPA and DEQ are spending significant resources to clean up contaminated water and provide safe drinking water to residential areas. We would not build a repository that contaminates clean water.
- Some ways contaminant release is prevented include: (1) sides are sloped to prevent erosion; (2) water channels on the completed portions of the repositories are lined and armored with clean rock to prevent contact with the underlying contaminated soil; (3) silt fences, vegetation, and other erosion controls are installed around the disturbed ground to capture fine material in the run-off water; and (4) inspections by operations staff check on the effectiveness of the erosion protection measures. If a portion of the repository is eroding, measures will be taken to stop the erosion.

### **Have the agencies evaluated any impacts to endangered species from the Wedge Expansion?**

No endangered species are present in or near the expansion area. No designated critical habitat is near the expansion site, although critical bull trout habitat begins about 2.7 miles downstream from the project on the South Fork of the Coeur d'Alene River. The agencies and UMG have evaluated whether or not adverse affects to endangered species may occur as a result of this expansion. The most likely potential affect may have occurred if sediment and metals could escape the Wedge Expansion and be carried to critical habitat downstream on the South Fork of the Coeur d'Alene River. Because there is not a continuous surface water connection to the South Fork, and because the downstream West Page Swamp acts as an effective filtration/attenuation system, the risk of increasing contamination in the South Fork is remote. Even so, the agencies and UMG have designed many features to reduce the release of sediment and metals into surface and groundwater near the expansion.

**What are the impacts to the recreation on the Trail of the Coeur d’ Alenes?**

The Wedge Expansion will have no affects on recreation along the trail. All traffic occurs along Highway 10 and the roads within the existing facility. Construction will be limited to the southwestern area of the existing repository.

**Has EPA met its obligation to consult with the Coeur d’Alene Tribe Historic Preservation Officer and the Idaho Historic Preservation Officer regarding potential impacts to historic places and structures?**

EPA and DEQ are currently researching whether the Wedge Expansion will be located near or on historic structures or places. Once the research is complete, both the Coeur d’Alene Tribe Historic Preservation Officer and the Idaho Historic Preservation Officer will be consulted regarding our results.

**How will you make sure that Page Repository doesn’t become a dumping ground for litter and junk?**

In the past, some litter and junk was dumped at the Page Repository. Since the PHD installed a card key gate, very little junk or solid waste shows up at Page. To get a disposal permit, users can call Panhandle Health District at 208-783-0707. The repository will not accept household refuse, electronics, information technology wastes, household hazardous wastes, wood waste, or construction waste that is not permitted by Panhandle Health District under its Institutional Controls Program.

**Can the local communities ever use the Page Repository for snow storage and disposal again?**

In the past, Page Repository was used for snow storage and disposal. However, the use resulted in erosion problems on the surface of the repository that required erosion repairs and improvements to the roadways and water management systems. The extra water added to the surface of the repository made large portions of the site unusable until very late each spring. Therefore, the agencies and UMG decided that the repository would no longer be available for snow storage and disposal.

However, should a proposal come from the community regarding how they would fund disposal of snow, maintain roadways and best management practices, and protect the repository, the agencies and UMG may reconsider this restriction.

**Why aren’t “coarse and durable materials” re-used instead of taking up valuable repository space?**

For over 15 years, all materials -- including asphalt, concrete, iron, root wads, timber, carpets, plastics, etc. -- that were excavated or removed from construction sites in the Bunker Hill Box, were sent to Page for disposal. This is because there was no practical

waste management plan in place which included segregation and re-use (or disposal) of materials according to each material's characteristics. EPA, DEQ and UMG are working to evaluate cost effective ways to manage these materials. This includes looking at alternatives for separating out coarse durable materials either at excavations or at the repository so they can be reused.

Based on the last few years of waste deliveries, DEQ estimates that from 30 to 60 percent of the waste received at Page Repository is asphalt and concrete. If an effective segregation and re-use plan can be designed and is supported by the community, costs for community infrastructure might be reduced, and the life of the Page Repository could be extended.

### **What about ICP waste that becomes contaminated with petroleum?**

Mining-contaminated ICP waste sometimes gets contaminated with petroleum products also. A procedure for handling relatively small amounts of ICP waste that has become contaminated with petroleum has been developed for use at the Page Repository. With DEQ oversight and approval, this material may be brought to the repository and land-farmed until petroleum constituents are below specified levels. Land-farming is the industry standard for treating petroleum-contaminated soils. The procedure is described in a document titled *Requirements for Disposal of Petroleum Contaminated ICP Wastes in the Page Repository*, dated May 20, 2009.

### **What will the Page Repository look like when the 1.6 acre expansion is filled?**

Within a couple of years after this expansion is complete, the whole repository will be box shaped with a slightly rounded surface, to route drainage towards the four corners. Although there will be several hundred feet of hardened or graveled roadways and parking or staging areas, most of the surface will be densely vegetated with natural grass and shrubs. The repository will be fenced near the Trail of the Coeur d' Alenes to prevent pedestrian access. A gate will be provided for use by the South Fork Sewer District. At this time, neither the agencies nor the Sewer District are sure of how the Sewer District may landscape their property for future development.

### **What will the cover of the Page Repository consist of?**

The final cover at the Page Repository is specified in the *Page Pond Closure Final Remedial Design Report*, dated July 1995. The cover will consist of yard soils and ICP soils, graded to promote drainage and vegetated with native grasses to protect from erosion.

### **Will traffic increase in the area as a result of the wedge expansion?**

No. In fact, in recent years as the Box yards cleanup was completed, traffic to the repository has been reduced to local Box property owners and contractors who dispose of

ICP waste. However, some waste may be generated during future cleanup activities to protect groundwater and this waste may come to the Page Repository.

**Will the expansion work be noisy?**

Expansion work will require heavy machinery and trucks much like those that have been hauling and operating at the repository for many years. Some additional noise may be noticed along the Silver Valley Highway near the expansion site. Expansion work to place the exterior berms, base layer, and extension of the haul road will take three to four weeks.

**Will there be dust?**

There may be small amounts of dust at the Wedge Expansion repository as it is being used for disposal. The disposal cell within the 1.6 acre expansion will be about 0.7 acre – much smaller than the existing repository – with a much smaller capacity to generate dust.

**Why don't you ship Bunker Hill Superfund waste out of the site or out of Idaho?**

EPA believes it is not necessary to ship waste from the Bunker Hill site to another community since the waste can be safely contained and managed within the site. It also would be much more expensive to ship wastes out of the site and, at this time, the cleanup is largely funded by U.S. taxpayer dollars. EPA, the State, and UMG have a track record of safely constructing and managing these types of disposal sites in the Coeur d'Alene Basin.

**What's been happening at the Page Repository in the last few years?**

Development in the Box has continued to generate ICP wastes that have been disposed of in the repository and the repository has filled up. The property owner, South Fork Sewer District, has asked the agencies to leave the repository at its current elevation to keep options open for future use of the property.

UMG is responsible for providing a long-term repository for the populated areas of the Box (Operable Unit 1). Similarly, EPA and DEQ are responsible for providing a long-term repository for the non-populated areas of the Box (Operable Unit 2). To make the best use of available land and to provide a repository that is easy to manage, EPA and DEQ are working with UMG to site a future combined repository for use by all citizens within the Bunker Hill Box. This collaborative effort involves estimating the amount of material that will be generated in the future, finding the right location, and designing a cost-effective, protective repository.

UMG, DEQ, and EPA have been working for some time on coming to agreement on the first two tasks: estimating future ICP quantities and identifying an appropriate location within the Box for the long-term repository. The 1.6 acre expansion will give us more

time to work on these challenges together and develop a plan to meet future disposal needs.

### **Who owns the Page Repository?**

The bulk of the project area was an abandoned tailings impoundment and mill site owned by Asarco. Most of the existing repository and the waste water treatment facilities are owned by the South Fork Sewer District. A small portion of the existing repository and the West Page Swamp are properties that belong to Asarco, but will be transferred to the State of Idaho in an Asarco bankruptcy settlement.

### **Who is in charge of the Wedge Expansion?**

Idaho Department of Environmental Quality (DEQ) and the U.S. Environmental Protection Agency are working with the Upstream Mining Group (UMG). The UMG will do most of the field work. DEQ and EPA will do oversight.

Mining companies found to be partially responsible for the contamination formed the UMG to facilitate cleanup of yard soils in the populated area of the Bunker Hill Box in accordance with the 1992 Consent Decree. Since that decree, the agencies and UMG have worked together to do work consistent with their respective mandates.

### **What is the role of Panhandle Health District (PHD)?**

PHD is the lead agency for the ICP. PHD issues permits for disposal of contaminated soils and does oversight to ensure protection of ICP caps and covers. PHD monitors blood lead levels in the community and helps coordinate local meetings, including those held by the Bunker Hill Task Force. They also manage the contract for maintenance of the Page Repository. PHD supports continued operation and expansion of the repository.

### **Where can I get more information?**

Select project documents can be viewed at:

Kellogg Public Library	EPA Records Center
16 West Market Avenue	1200 Sixth Avenue
Kellogg, ID 83827	Seattle, WA 98101
208-786-7231	206-553-4494

Plus, there is information on the Internet at the following sites.

Page Repository Website:

[http://www.deq.idaho.gov/waste/prog\\_issues/mining/page\\_repository.cfm](http://www.deq.idaho.gov/waste/prog_issues/mining/page_repository.cfm)

EPA Cleanup Website: <http://yosemite.epa.gov/r10/cleanup.nsf/sites/cda>

**Who can I contact?**

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