



Repository Siting Criteria

June 2009

During a May 14, 2009 workshop in Wallace, Idaho, citizens expressed issues, concerns, and questions about the repository siting process. Below are criteria that will be used to help select preferred locations for a repository. Many criteria directly respond to concerns expressed by the public in that workshop. Others are criteria that the State and EPA also believe are important.

Repository Siting Criteria

Issue, Concern, or Question from May Workshop	Siting Criteria
Oppose East Mission Flats repository - wildlife and wetland; swans downstream recently.	1. Low negative impact to wetlands and related wildlife.
How will you keep contamination out of creeks? IDFG most concerned about impacts to fish, wildlife, and hunters/other people. Hard to find locations without surface water concerns.	2. Low negative impact to surface waters and fish and wildlife.
Why not pick an appropriate place that would not need to be moved if there's a failure? What if contaminants wash out from repository?	3. Low negative impact to floodplain.
	4. Site is not near active faults or likely for landslides.
My main concern is children's health. I live in Osburn and own a well. Will you guarantee the water's good and test it for perpetuity? Will there be an indoor cleanup of homes?	5. Low negative impact to persons living or working nearby (residences, schools, urban areas).
	6. Low negative impact to existing persons or businesses along the truck route.
	7. Low trucking costs by locating site close to removal areas.
	8. Does not use land that would otherwise be readily developable (economic development benefit).
	9. High capacity (can accommodate large quantity of material).

Other issues raised at the May workshop were not directly related to siting criteria, but do relate to key assumptions that will help guide the siting analysis. Those issues, concerns, and questions and the key assumptions follow. (Note: “Fill the Holes” means putting waste soils into low spots in communities to create land that can be developed.)

Issues, Concerns, and Questions that Will Help Guide the Siting Analysis	
Issue, Concern, or Question from May Workshop	Assumptions Guiding the Siting Analysis
Why not use the “fill the hole” strategy to increase land that’s ready for economic development?	State, EPA, and local officials are studying how a “fill the hole” strategy could be implemented within legal requirements. That process is separate from this siting process. Even if “fill the holes” happens, there is so much soil to dispose of that a new repository is still needed.
Why not use excavated material to fill Government Gulch and make it ready for economic development?	Government Gulch is being considered as a repository in the site selection process. If Government Gulch is selected as the new Upper Basin repository, consideration for economic development re-use will be incorporated in the final design. If it is not selected, Government Gulch property (currently owned by the State) would remain available for purchase as-is by developers. The State also would consider developers’ proposals to import contaminated fill to support new development.
Can you ship waste outside of the Basin instead of siting a repository inside the Basin?	Yes. However, when selecting cleanup options EPA considers whether a repository can be located within the Superfund site to safely contain cleanup wastes. If safe disposal sites are available, EPA will consider other factors such as costs associated with disposing of wastes within or outside of the Superfund site. At the Bunker Hill site, EPA has determined that safe disposal sites can be located within the site and that it is more cost-effective to do so.
Why not investigate some good alternatives to repositories?	Given the depth and breadth of contaminated soils throughout the Coeur d’Alene Basin, the primary waste strategy in the 2002 Record of Decision (ROD) relies on consolidation of materials on site using repositories and to the extent practicable at mine and mill sites. The primary reasons for this strategy: consistency with national cleanup plans wherein the waste remains on the site in which it is found, cleanup cost estimate assumptions, minimization of costs, minimization of cleanup time.
Why not look at flat ridges, not just valley floor - on federal land?	Both flat ridges and federally-owned lands are being considered as potential repository sites if they are contaminated with mine waste and meet other technical requirements. If the flat ridges are not contaminated, EPA and DEQ would not consider them as appropriate locations for cleanup disposal.
How can you keep the repository sites from seeping metals into groundwater? Oppose East Mission Flats repository because of	All repository sites are designed and managed to protect groundwater and drinking water wells. This means that the repository will not degrade groundwater underlying the repository. If the groundwater is already contaminated before site

potential for contaminating wells.	construction begins, the new repository will not make the contamination worse. Groundwater monitoring will take place during and after construction.
Why not spend the money instead on sewers and water in our communities?	EPA and DEQ recognize that sewer and water systems in the communities need upgrades and repairs. The cleanup that the agencies are implementing does not call for wholesale repair and replacement of dilapidated water and sewer systems. EPA and DEQ are spending Superfund money that they are authorized to spend on performing the cleanup described in the Records of Decision (ROD). There are other programs that focus on water and sewer systems. These programs periodically make funds available for communities through the DEQ Revolving Fund Program. Points of contact are available upon request.
Do you require a repository site to have a willing seller?	A willing seller is preferred.
Would you use a particular site even if the majority of the people oppose it?	As shown above, the selection criteria include many issues that local residents have said are important to them. The ultimate decision for a new site will be made by the State and EPA after considering the many selection criteria and input from the public.
Woodland Park - ATVs and motorcycles riding all over that contaminated area – who's supposed to be managing this?	Ultimately, the responsibility rests with the land owners to manage their lands and these uses. This concern is outside the scope of the repository siting process. EPA and DEQ continue to inform the public about health risks associated with these types of recreational activities. Citizens and community leaders could be of great help in getting the word out that these activities are not safe on contaminated lands.

Repository Siting – Next Steps

The State and EPA are using two “first cut” criteria to screen a large number of sites down to a small number for further study. Those criteria are storage volume and current land use. The minimum storage volume used for screening purposes is 500,000 cubic yards. This is because estimates show the project will initially require capacity of about 500,000 yards, and more in the long-term. Also, we recognize that communities will require more capacity as they undergo redevelopment and infrastructure revitalization.

Those potential sites that have less than 500,000 cubic yard capacity, or are in active use by their owners, will be removed from the list of potential sites. The results of the first cut screening analysis will be posted at <http://www.basincommission.com> and presented at a community workshop on June 24, 2009, 6:30 to 8:30 pm at the Wallace Inn in Wallace. At the June workshop, the nine criteria listed above will be applied in a more detailed screening process to the remaining sites. Citizens can share their views about the criteria, the siting process, and the results of the analysis. Come join us and let us know what you think about the siting process and the short-list of viable repository sites.