



Questions about Government Gulch Limited Use Repository

Coeur d'Alene Basin Cleanup Project
Idaho Department of Environmental Quality

Open House
4:00 p.m. to 7:00 p.m.
April 7th, 2015

Below are some questions and answers about the new Limited Use Repository planned in Government Gulch. The Limited Use Repository policy is available at:

www.deq.idaho.gov/bunkerhillsuperfundsite

Q: Why is a Limited Use Repository (LUR) being built?

A: Capacity in our main repositories is limited and reserved for contaminated waste. Remediation waste is placed in three repositories engineered to be maintained and protected. These repositories are intended to receive waste for the cleanup and from community activities for long periods of time.

Asphalt and concrete waste are ideal for reuse in constructed fills where there is re-development potential. Approximately 100,000 cubic yards of storage space over the next three years could be segregated and utilized in locations that are suitable for construction fill.

Limited Use Repositories can also be built to more easily blend into the landscape as well as into future planning for development in the Silver Valley. In the long run, LURs will extend the operational life of the large land repositories and will place recycled wastes where they may be covered by development.

Q: How large of an area will be filled at the Government Gulch LUR, and where will the fill be located?

A: The Government Gulch property is located south of the historic Bunker Hill smelter between Smelterville and Kellogg. It was once the site of a phosphoric acid plant and a major portion of the 1900's Bunker Hill Mining operation. The plant's buildings were removed and the area was capped and covered with six inches of clean soil.

The Bunker Hill Task Force, mayors, and Shoshone County Commissioners have been requesting EPA and DEQ to fill and provide for development of Government Gulch. The property will receive about 100,000 cubic yards of asphalt fill material from remediation projects. This material will be compacted in 1 foot thick lifts as it is brought onto the property. This LUR will result in about 6.3 acres of developable level ground.

Q: What type of material could be placed in a Limited Use Repository like Government Gulch?

A: Asphalt waste generated from the agencies remediation projects may be taken to a LUR. This includes road pavement and base materials that may stick to the pavement. An LUR will not accept solid waste and trash, or ICP-generated waste.

Q: What is the future use of the Government Gulch LUR property? Will the property be ready to build on after it has received the waste from the roads program?

A: The primary objective of the LUR policy is to safely dispose of asphalt pavement waste and base materials in a suitable location. It is not the state's design to prepare the site for any particular type of future construction. It is the State's intention that construction fill will improve the potential of the property to be developed in the future.

Q: What building restrictions will there be for reusing Government Gulch?

A: This property will be for sale. Any redevelopment would need to be done in accordance with Shoshone County Planning and Zoning codes and Institutional Controls Program (ICP) rules. Because the EPA and DEQ have significant interest in the disposed wastes, EPA and DEQ will work with Shoshone County and the Panhandle Health District to evaluate development proposals, to ensure the remedy is protected.

Q: Will Government Gulch and other Limited Use Repositories need to be capped?

A: Yes, the cleanup agencies will be responsible for providing a cap conforming to the ICP rules to protect community and ecological health. A 6" to 12" clean soils cap will be placed and revegetated on top of the LUR when it is closed as a repository. The ICP requires that during future development provide a clean barrier. This may include parking lots, buildings, gravel, or clean soil and vegetation.

Q: When will construction of the LUR in Government Gulch begin?

A: The Government Gulch property should be ready to accept waste by the end of May, 2015. Roads program hours of operation are typically Monday – Friday 7:00AM to 5:00PM. Truck traffic will enter Government Gulch Road from the frontage road between Kellogg and Smeltonville, likely using the I-90 Smeltonville exit as well. Trucks are required to maintain posted speed limits and carry covered loads. Work will continue into the fall as weather allows.

Q: Will the LUR have decontamination facilities similar to other repositories?

A: Like other repositories where there are designated dumping and stockpile areas for ICP users, the LUR will maintain clean surfaces to which trucks delivering asphalt wastes will be restricted. This system is not perfect in preventing mud and dirt from being tracked around the site, so the clean surfaces will have to be routinely washed down by water trucks. Water from these surfaces will be drained into settling basins where any sediment can be contained and disposed on site.

Q: Is there any type of environmental assessment for LUR locations?

A: Yes, the RI/FS stage of the Bunker Hill Cleanup included an environmental assessment. Additionally, each potential LUR location undergoes a suitability evaluation starting with the criteria specified in the Community Fill Plan policy. LUR locations must be located in the

Institutional Controls Administrative boundary. Design, operations, and closure of LURs provide for consistency with state, federal and local regulations.

Q: Will using asphalt as fill cause more metals to leach into the ground?

A: No. There has been extensive research of the leachability of residual asphalt cement. Idaho is relying on the research completed by other states. Another way to consider this is LURs have a much smaller surface area than the hundreds of miles of public roadways and 7,000 properties cleaned up throughout the valley. This means the components in asphalt placed in the smaller footprint of the LUR is less likely mobilized by rain and snow than it was in its locations of the roadways.

Q. Will a liner be placed on top of the current grade at Government Gulch?

A: Well-compacted asphalt, along with a clean cap and cover, reduces leachability of contaminated soils. While the site conditions and materials do not warrant a liner, the design does include groundwater interceptions and stormwater control systems. These systems will route naturally-occurring groundwater and stormwater away from the site before they have time to react with existing waste and transmit metals.

Q: Will there be other locations for limited use repositories?

A: Yes, in the future there may be other properties that could be suitable as limited use repositories in the Valley.