

2014 ANNUAL UPDATE TO THE BUNKER HILL SUPERFUND CLEANUP PLAN

FINAL: February 2015

INTRODUCTION

In February 2013, the U.S. Environmental Protection Agency (EPA) issued a 10-year plan for Superfund cleanup activities within the Bunker Hill Mining and Metallurgical Complex Superfund Site (CERCLIS identification number IDD048340921) located in northern Idaho. Copies of this EPA plan, titled *Bunker Hill Mining and Metallurgical Complex Superfund Site, Superfund Cleanup Implementation Plan 2012 – 2022* (Implementation Plan), can be found online at the following location:

http://www.epa.gov/region10/pdf/sites/bunker_hill/cda_basin/BH_ImpPlan_Final_20Feb2013.pdf

The 10-year Implementation Plan summarizes and discusses prioritized cleanup activities included in the Upper Basin Interim ROD Amendment (EPA, 2012) and prior decision documents (EPA, 1991, 1992, 1996a, 1996b, 1998, 2001, 2002) for the Bunker Hill Site. As described in the 10-year Implementation Plan, modifications and amendments to the plan are anticipated and will be documented by EPA on an annual basis. A more comprehensive update to the Implementation Plan will be made every five years to coincide with the statutorily required site five-year review. The next scheduled five-year review is the fall of 2015.

This document comprises the annual update to the Bunker Hill Superfund Cleanup Implementation Plan.

MODIFICATIONS TO THE 10-YEAR IMPLEMENTATION PLAN

Table 1 summarizes the modifications to the 10-year Implementation Plan that have occurred during the past year. The majority of the modifications are minor schedule changes to some activities. In addition to the schedule changes, the scope of some planned activities for 2015 has also been expanded (i.e., within Operable Unit [OU] 3). These changes include efforts to increase repository disposal capacities for OU 2 and OU3 and within OU 2, adding a new sludge disposal cell on top of the Central Impoundment Area (adjacent to the existing Central Treatment Plant). Figure 1 from the 10-year Implementation Plan has been updated to reflect the schedule modifications described in Table 1.

Table 1. Modifications to the Bunker Hill Superfund Cleanup Plan		
Activity/Location	Action	Description of Modification
Bunker Hill Box (OU2)	CTP Upgrades/Expansion for OU2 Waters and New Discharge Pipeline; CIA Groundwater Collection System (GWCS); CTP Sludge Storage Facility	Remedial design (RD) for the CTP Upgrades and the CIA GWCS project continued in 2014. A new geomembrane-lined sludge storage facility has been added to the scope of the CTP/GWCS project mid-2014 for disposal of sludge from the CTP because it is anticipated that the current sludge cell is going to reach capacity during the upgrade contract period. RD in 2014 included preparation of a solicitation document to competitively bid for a Design-Build-Operate (DBO) contractor that would complete the RD, implement the RA, and conduct operations and maintenance (O&M) for a period of one year after completion. It is anticipated that the DBO contract will be awarded mid-2015 and that construction would begin in 2016. The DBO contract is anticipated to be completed at the end of 2018 when the long-term O&M of the CTP/GWCS/Sludge Facility will be transitioned to an operator under the direction of Idaho DEQ.
Canyon Creek Watershed (OU3)	Remediation of Hecla-Star Complex and Adjacent Sites	EPA completed initial investigations of this site in 2012 in anticipation of further development of the site by Hecla Mining Company. In 2013 Hecla decided to discontinue use of this site for their ongoing mining operations and no immediate cleanup action was scheduled in order to coordinate with Hecla's plans. Currently EPA's primary cleanup efforts focus on Ninemile Creek which has the greater impact on water quality in the Upper South Fork of the Coeur d'Alene River of the two drainages. Specific focus on Ninemile Creek is expected to occur over at least the next five years and then potentially shift to high priority source removal sites in Canyon Creek. Specific cleanup actions within Canyon Creek could occur sooner if warranted based on human health exposure as determined by EPA and DEQ.
Lower Basin (OU3)	Pilot Projects and Remedial Actions	In early 2013 when EPA published the 10-year plan, specific pilot projects had not been identified. During the Spring of 2013, EPA conducted a public outreach process to solicit pilot project proposals from the public and stakeholders. Through this process, EPA selected an initial pilot project in the Lower Basin for bank stabilization of a portion of the Coeur d'Alene River adjacent to the Khanderosa

Table 1. Modifications to the Bunker Hill Superfund Cleanup Plan		
Activity/Location	Action	Description of Modification
		<p>Campground. The RD for the Khanderosa Campground bank stabilization pilot project was conducted in the latter part of 2013 and completed in early 2014. The RA was implemented in the Fall of 2014. Over the next one to two years (2015 and 2016), EPA anticipates completion of hydraulic and sediment transport models that will guide further pilot projects and/or larger scale remedial actions in the Lower Basin. Concurrent with the hydraulic and sediment transport models EPA will be evaluating other bench and pilot scale projects that can be implemented without the added benefit that the models can provide.</p>
Repository Development and Management (OUs 1, 2, and 3)	Design/Construction of Lower Burke Canyon Repository (LBCR)	Work at the LBCR will occur in phases. In 2014 work began at the north end of the LBCR in order to allow for receipt of some waste beginning in 2015. The pace for further development of the repository will be dependent on the timing of cleanup actions for Canyon Creek
	Big Creek Repository (BCR) Use and Closure	EPA anticipates waste disposal in the Big Creek Repository through 2015. In 2015, a capping/closure evaluation will be conducted for the BCR with cap construction planned for 2016.
	Big Creek Repository Annex (BCRA)	Based on data gathering conducted in 2013 and a design in 2014, EPA has constructed an annex to the BCR. Initial construction of the BCRA began in 2014 with use of the repository planned to begin in 2015.
	Osburn Tailings Impoundment Repository	Design completion for the Osburn Tailings Impoundment Repository was placed on hold pending completion of the BCRA and LBCR remedial designs and initial construction. The date for restart of this design is pending an update on the overall site waste management strategy and agreements with the property owner. At this time restart of the Remedial Design is tentatively planned for 2017 with construction potentially occurring in 2018.
Property Remediation Program	Ongoing	No significant changes have been made in cleanup actions conducted under the BPRP. In 2015, the BPRP will be transitioned to the Asarco Trust with planning activities conducted by IDEQ. The BPRP is

Table 1. Modifications to the Bunker Hill Superfund Cleanup Plan		
Activity/Location	Action	Description of Modification
		anticipated to be substantially completed at the end of 2017. Additional property remediation or maintenance to existing remediated properties beyond 2017 is anticipated to occur on an as-needed basis.