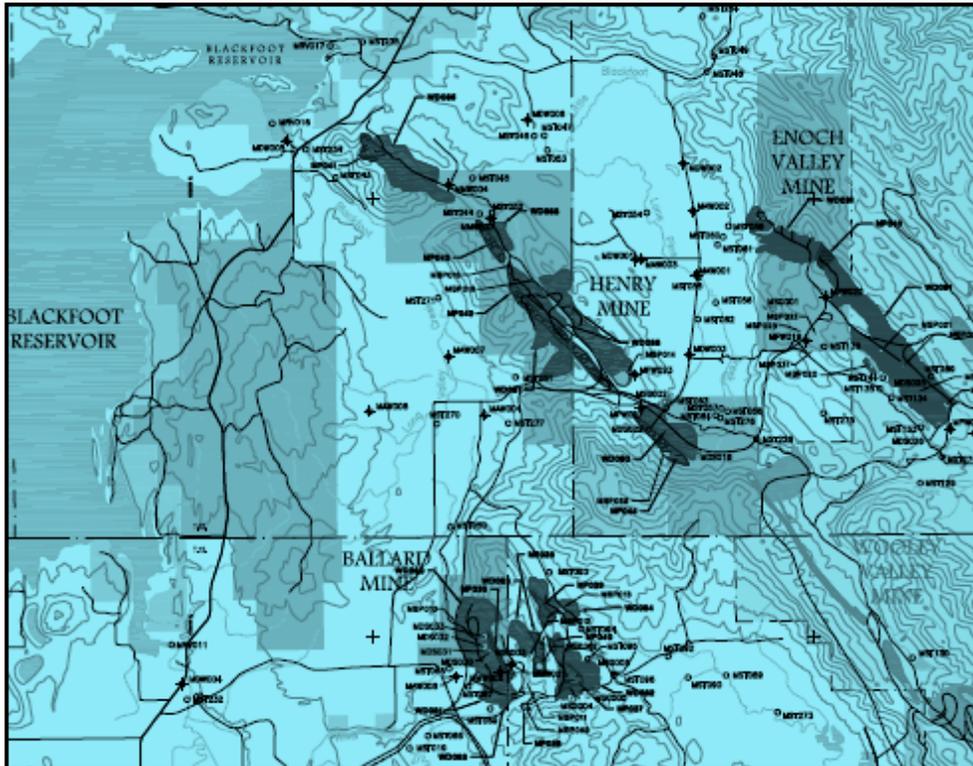


# BALLARD, ENOCH VALLEY, AND HENRY (P4) MINES COMMUNITY INVOLVEMENT PLAN

2010



Prepared under Contract to Idaho Department of Environmental Quality,  
Pocatello Regional Office Mining Program

In support of  
Community Involvement for Selenium Issues in Southeast Idaho

For the U.S. Environmental Protection Agency and the Following Support Agencies:  
Idaho Department of Environmental Quality  
Shoshone Bannock Tribes  
U.S. Department of the Interior, Bureau of Land Management  
U.S. Department of Agriculture, Forest Service  
U.S. Fish and Wildlife Service

**Prepared by:**  
North Wind, Inc.



## Community Involvement Plan Ballard, Enoch Valley, and Henry (P4) Mines Caribou County, Idaho

2010

This Community Involvement Plan summarizes stakeholder and interested parties' comments and concerns about the Ballard, Enoch Valley, and Henry Mines, owned by P4 Production L.L.C. (P4), a wholly owned subsidiary of Monsanto Company. The Plan describes how the U.S. Environmental Protection Agency (EPA), in cooperation with federal, state, and Tribal agencies, proposes to work with the community on a Remedial Investigation/ Feasibility Study (RI/FS) and subsequent cleanup (or Remedial Action) at the sites, which will be done under the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The EPA is the lead agency for this effort with the Idaho Department of Environmental Quality (DEQ), U.S. Department of Interior, Bureau of Land Management (BLM), U.S. Department of Agriculture, Forest Service (Forest Service), U.S. Fish and Wildlife Service (USFWS), and the Shoshone-Bannock Tribes participating as support agencies.

This Plan identifies outreach activities the agencies will use to address stakeholder concerns and inform the public about this work and opportunities they will have to provide input during the cleanup process. In some instances, opportunities for public participation will be informal, while other opportunities such as comment periods on plans developed at specific points during the process will be more structured.

The Plan will be sent to people who participated in community interviews relating to cleanup of the three P4 mines and the nearby Conda Mine, where a CERCLA RI/FS is also in progress on a similar schedule. Community involvement activities for these projects are being coordinated to accommodate stakeholders, who may have an interest in the cleanup of more than one site. The Plan will be reviewed and revised as project developments require and will be posted for review and comment at the following locations:

- EPA website (<http://www.epa.gov/region10/>)
- DEQ website (<http://www.deq.idaho.gov/Applications/NewsApp/comment.cfm>)
- Selenium Information System Project (SISP) website hosted by Idaho State University (ISU) ([http://giscenter-ims.isu.edu/SISP/SISP\\_Home\\_Page.html](http://giscenter-ims.isu.edu/SISP/SISP_Home_Page.html))
- Information Repository locations (see Page 6 for locations).

### GOALS OF THE COMMUNITY INVOLVEMENT PLAN

- Inform the public of current and planned site activities
- Maintain open, two-way communication with the public about site cleanup, ensuring questions are answered and concerns are addressed as they occur
- Provide interested parties with useful information

#### ***This plan contains, in the following order:***

- Goals of the Community Involvement Plan
- Area Background
- About the Ballard, Enoch Valley, and Henry (P4) Mine Sites
- History of Community Involvement
- Current Community Concerns
- Planned Community Involvement Activities
- Attachment 1 (A and B): Results of Community Interviews
- Attachment 2: Community Involvement Requirements and Action Plan

#### ***For technical or public involvement related questions, or to request documents contact:***

*Dave Tomten*  
*EPA Idaho Operations Office*  
*(208) 378-5763*  
[\*Tomten.Dave@epa.gov\*](mailto:Tomten.Dave@epa.gov)

- Provide citizens with opportunities to comment on, and be involved in, technical decisions
- Encourage and assist local citizens in providing input to agency decisions that will have long-term effects on their community.

## AREA BACKGROUND

Caribou County covers an area of approximately 1,766 square miles in Southeast Idaho. Wyoming borders the county on the east; Bear Lake and Franklin counties border it on the south; Bannock County forms its western border; and Bingham and Bonneville counties border it on the north. The estimated Caribou County population in 2008 was 6,826, and median household income in 2007 was \$48,066, higher than the median Idaho average of \$46,136.<sup>1</sup> The county seat is Soda Springs, which had an estimated population of 3,098 in 2007.<sup>2</sup>

Southeast Idaho is a major phosphate-producing region, and phosphate mining has been an important industry here since the mid-20th century. In Caribou and adjacent counties, phosphate mining has left behind waste rock dumps and open pits from which selenium and other contaminants may be released. Past studies – including mining company investigations, area-wide investigations, mine-specific studies and others – have identified these waste rock dumps as sources of contamination that may pose a risk to human health and/or the environment. These contaminants are known or suspected to be present in groundwater, surface water, sediment, soils, and plants and may be transported beyond the former mining areas.

### About the Ballard, Enoch Valley, and Henry (P4) Mines

P4 is the potentially responsible party for cleanup of these three mine sites. The P4 mine sites are all located northeast of Soda Springs and east of State Highway 34 at varying distances (between one to four miles at their closest locations). The three mines are located on lands that are a mix of private and public ownership with much of the land privately owned.

The Ballard Mine is a historic phosphate mine that operated from 1951 to 1969. It is located on private and state lands in Caribou County, about 12 miles north of Soda Springs. The mine site is comprised of six distinct open mine pits (191 acres), six distinct waste rock dumps (317 acres), various sedimentation ponds, haul roads, shop building, and other facilities (96 acres). The footprint of the mining disturbance is about 1.7 miles long and 1.2 miles wide. Around 10.4 million tons of phosphate ore were mined, with all of the ore hauled to an elemental phosphorous plant near Soda Springs. Approximately 20 million cubic yards of waste rock were stripped, with about two million cubic yards used to backfill pits, and the remainder hauled to dumps. Following mining, some experimental plantings and reclamation research occurred dating back to 1958.

The Henry Mine is a historic phosphate mine that operated from 1969 to 1989. It is located about 15 miles north of Soda Springs and four miles southeast of Henry, Idaho. The mine is located mostly on state land, as well as some private and a small amount of public land administered by the BLM. The mine site is comprised of five mine pits or panels, waste rock dumps, haul roads, and sedimentation ponds. The footprint of the mining disturbance is about five miles long and one-half mile wide, with about 1,000 acres disturbed. About 18 million tons of ore and 99.6 million cubic yards of waste rock were produced. The site was reclaimed by backfilling most of the pits and grading, shaping, and vegetating disturbed areas.

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<sup>1</sup> U.S. Census Bureau, <http://quickfacts.census.gov/qfd/index.html>

<sup>2</sup> Sub-county population estimates: Idaho 2000-2007, U.S. Census Bureau, Population Division. 2009-03-18.

The Enoch Valley Mine operated from 1989 to about 2004. Portions of the mine site remain active, including haul roads, ore storage, and administrative and maintenance facilities. It is located 2.5 miles east of the Henry Mine and about 19 miles northeast of Soda Springs. The mine site is located on state lands and public lands administered by the Forest Service as well as a small amount of private land. The mine site is comprised of two main waste rock dumps, and a large open pit most of which has been backfilled, along with ancillary facilities. Approximately 14.6 million tons of ore, and 51.5 million cubic yards of waste rock were produced. Much of the disturbed area of mine was reclaimed by shaping, spreading topsoil or growth media, and re-vegetating.

Waste rock piles comprised of shales high in selenium and other trace metals are present on the sites. Sampling results performed since 1996 show elevated levels of selenium and other hazardous substances in waste rock soils, vegetation, surface water, and other media, indicating that these constituents are leaching from waste rock into the environment. Livestock deaths associated with grazing have not been known to occur at the P4 mines, but are known to have occurred near other mines in the vicinity.

In accordance with a November 2009 Settlement Agreement and Agreement on Consent (AOC) and a July 2000 Memorandum of Understanding Concerning Contamination from the Phosphate Mining Operations in Southeastern Idaho, the EPA is the “lead agency” for these sites. The BLM, Forest Service, Idaho DEQ, USFWS, and the Shoshone-Bannock Tribes are participating as “support agencies.” As a former operator of the Ballard, Enoch Valley, and Henry Mines, P4 entered into the AOC and will investigate the sites with agency oversight.

The 2009 AOC for the RI/FS supersedes a 2003 AOC to complete a Site Investigation and Engineering Evaluation/Cost Analysis for these mines. Data from that effort that are of appropriate type and quality will be incorporated into the RI/FS as applicable.

The RI/FS will identify the types of contamination that exist at the site, how much exists, and how far it extends based on the results of sampling and testing of the following:

- Groundwater (occurrence, distribution, and effect)
- Surface water
- Sediment
- Soil
- Vegetation
- Aquatic species (fish, vegetation, and invertebrates)
- Terrestrial species (mammals, birds, and insects)
- Condition of reclaimed waste rock dumps

This information will be used to determine whether any contaminants pose unacceptable risk to human health or the environment, and, if so, to evaluate potential cleanup options and recommend a preferred alternative.

## **HISTORY OF COMMUNITY INVOLVEMENT**

Previous community involvement activities included mailing out one fact sheet and holding one public information meeting in Soda Springs in 2008.

## **CURRENT COMMUNITY CONCERNS**

Interviews with agency and mining company representatives took place in fall/winter 2008. Interviews with area stakeholders began in early May 2009, starting with elected officials: the Soda Springs mayor and City Council, regional staffers for the Idaho Congressional delegation, Caribou County commissioners, and local representatives to the Idaho Legislature. These were followed by interviews

with area residents; a list of potential interviewees developed during the course of the early interviews was supplemented with names of individuals who lived or worked near the P4 Mines, as well as other names recommended by stakeholders. Two interview availabilities at the Soda Springs Library, advertised in the *Caribou County Sun*, took place in September 2009.

Altogether, 63 individuals participated: 18 agency staff, seven mining company officials, 15 elected officials, 20 private individuals who live near the mine or have economic or other interests in it, and representatives of four environmental interest groups. Their comments and concerns fall into the following general categories:

Agency actions	Political factors
Blackfoot River impacts	Potential job/financial loss
CERCLA process	Public information
Contamination	Stakeholder relationships
Cost of cleanup	Surface water
Data/data quality	Technical approach
Ecology	Tribal issues
Groundwater	Vegetation/grazing impacts
Lack of progress	Visual and aesthetic impacts
Mining company actions	

Interview results, along with other information, are included as attachments 1A and 1B to this Plan. Attachment 1A summarizes specific comments in each of these categories, showing stakeholder groups who expressed each concern. Attachment 1B includes examples of text from interviews (respondents are not identified). Results of the interviews were also used to develop the Community Involvement Plan for cleanup of the Conda Mine, which is located near the P4 Mines but is being addressed in a separate RI/FS.

Interviewees also provided information about their preferences for receiving information about the RI/FS and participating in the process. These preferences, summarized below, helped shape the activities recommended in this Plan.

1. Interviewees in all groups (except Federal elected officials) cited inadequate public information as a concern.
2. Many interviewees said they wanted access to current information regarding contamination, area environmental investigations, and cleanup plans.
3. A number of interviewees said that they liked having the SISP website maintained by ISU, but that it is outdated. Several stakeholders recommended upgrading it with recent relevant documents and better functionality.
4. Some interviewees complained that the Administrative Record at the DEQ is unavailable for search, but requires a request for specific information. Many interviewees were not aware that some records were available at the Soda Springs Library.
5. Interviewees expressed little interest in public meetings or workshops. Many cited farming and ranching obligations, winter travel hazards, and church activities as reasons for preferring other forms of communication.

Some residents have Internet access, while others who live near the mine sites have no ISP service. The community involvement options discussed in the CIP are those most often suggested by interviewees; they include communication methods to meet these varying needs.

## PLANNED COMMUNITY INVOLVEMENT ACTIVITIES

The activities proposed in this Community Involvement Plan address public involvement requirements established by law or regulation for all CERCLA sites. In addition, other activities may be conducted as requested by the public during the community interviews or throughout the remainder of the process. The required activities are included as a reference in Attachment 2: Community Involvement Requirements and Action Plan. Schedule estimates are approximate and will vary depending on project developments. This schedule includes estimates only for activities in 2010 at this point; it will be updated once a schedule is developed as part of the Ballard, Enoch Valley, and Henry Mines RI/FS Work Plan.

Public Information Updates – Updates on P4 project developments will continue to be prepared and distributed to stakeholders. Possible information products will include the following:

- Fact sheets – The fact sheet format will be similar to that of the “backgrounder” document provided to stakeholders who participated in interviews (*Spring 2009 Update: Phosphate Mine Site Investigation in Southeast Idaho*). They will focus on the status of the RI/FS process at the Ballard, Enoch Valley, and Henry Mine sites (and the Conda Mine, if appropriate); describe opportunities for stakeholder involvement; and generally try to address areas of interest. Fact sheets will be developed and mailed to the distribution list at key project milestones, or at least annually. This effort will be coordinated with distribution of district-wide annual status reports (described below).
- Postcards/e-mails – Postcards and e-mails could be used to direct stakeholders to review and comment opportunities, availability of the Administrative Record, and other key project developments. Fact sheets may substitute for postcards to provide information as appropriate.
- Press releases or briefings to announce important developments.
- Public notice – Some key project milestones will be communicated by publication of a public notice in local newspapers as required by CERCLA implementing regulations.
- Community display – A display explaining the RI/FS process (at the P4 Mines and Conda) will be developed for display at the Soda Springs Library.
- As the need arises, EPA will contribute information on RI/FS activities and environmental data for the P4 mines to other agencies for a planned annual status/data report that will summarize the cleanup status and sampling results for all mines in the project area for which data are available.

Key Contacts and Mailing Lists – Lists of key contacts (media representatives and elected officials) as well as a larger mailing list that includes all project stakeholders will be maintained to support distribution of information products.

Access to Documents – Some information about the P4 mines and other mines in the region is already available to the public via the DEQ website ([http://www.deq.state.id.us/waste/prog\\_issues.cfm#mine](http://www.deq.state.id.us/waste/prog_issues.cfm#mine)), the ISU SISIP website (<http://giscenter-ims.isu.edu/SISIP/>), and the Soda Springs Library. However, many stakeholders requested improved access to technical and decision documents. A number of stakeholders recommended updating the existing ISU website to provide better access to current sampling, analysis, quality assurance, and data validation plans. Annual data summaries, decision documents, and other documents will be posted to the ISU website. In addition, a page is being developed to provide information about the project on the EPA website, which will contain the contents of the Administrative Record (i.e., key documents), as well as a link to the ISU website. Information about public comment opportunities will be posted to the DEQ website at (<http://www.deq.idaho.gov/Applications/NewsApp/comment.cfm?CFID=150064&CFTOKEN=28798353>).

Notification of availability of key documents will take place via postcards or e-mails for those stakeholders who lack Internet access (as identified during community interviews), and will include

instructions about requesting hard copies of documents. Stakeholders may request other plans and reports by calling or e-mailing the project team member identified on p. 1 of this Plan.

The public will also have an opportunity to review and comment on this Community Involvement Plan in 2010 (see Attachment 2: Community Involvement Requirements and Action Plan for approximate schedule) and on the Proposed Plan when it is available (not yet scheduled).

Information Repository – CERCLA requires that an Administrative Record file for remedial actions be established at or near the site. In accordance with that requirement, an Administrative Record for the P4 Mines will be available for public review at the locations listed below. The public will be notified of the availability of the Administrative Record via the EPA, ISU, and DEQ websites and a newspaper notification. CERCLA also requires that information developed, received, published, or made available to the public be available for public inspection and copying and/or printing at an Information Repository.

EPA Region 10 Office in Boise (hard copy)  
1435 N Orchard Street  
Boise, ID 83706  
(208) 378-5763

DEQ Pocatello Regional Office (hard copy)  
444 Hospital Way, #300  
Pocatello, ID 83201  
(208) 236-6160

Soda Springs Public Library (electronic)  
149 S Main St  
Soda Springs, ID 83276-1496  
(208) 547-2606

Shoshone-Bannock Tribes Library (electronic)  
P.O. Box 306  
Fort Hall, ID 83203  
(208) 478-3882

Because of space limitations at the Soda Springs Library, information will be provided in electronic format. The library has a printer onsite for use by the public. Stakeholders may also make electronic copies of files. The public will be notified of the availability of the Information Repository via the EPA, DEQ, and ISU websites and a newspaper notification.

Public Meeting/Workshop on Proposed Plan – Informational meetings/workshops will take place at major project milestones (i.e., availability of the draft Proposed Plan) as required, and will be announced and advertised at least two weeks in advance in the *Caribou County Sun* and other regional papers of record. The community involvement team will develop a public meeting plan in advance, detailing plans for print and/or broadcast advertising, identifying media outlets, and ensuring the accuracy of mailing lists for key contacts and general distribution. Notification to stakeholders on the project contact list will take place via mail or e-mail (depending on any preferences identified during previous contacts). EPA will announce dates for community involvement activities associated with public review and comment on the Proposed Plan when the project technical schedule is complete.