



## Community Involvement Plan

August 2002

### St. Maries Creosote Site St. Maries, Idaho

This Community Involvement Plan summarizes stakeholder and interested parties' comments about the St. Maries Creosote Site. The Plan is EPA's "road map" for how we plan to work with the community on the hazardous waste cleanup at the site. It also outlines the methods we will use to keep the public up to date on our work, and opportunities for the public to become involved in future investigation and cleanup activities. The plan can be updated at any time as we receive new information. Please call Debra Sherbina, Community Involvement Coordinator, to share your ideas and concerns. She can be reached toll-free at 1-800-424-4372, extension 0247.

We are sending the plan to people who participated in the interviews and others who indicated an interest in the Plan, and are posting it on the EPA Region 10 webpage at <http://www.epa.gov/r10earth>. Click on "Index," then click on "S" to find St. Maries. If you have questions about this site, this plan, or would like additional information, please call, write or e-mail:

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

- About the St. Maries Creosote Site
- Current Community Concerns
- Planned Community Involvement Activities
- Community Involvement Activities To Date
- Potential Health and Environmental Concerns  
- ATSDR Involvement
- *Appendix*: Notes from Community Interviews

#### ***Do You Have Comments on the St. Maries Community Involvement Plan?***

EPA welcomes further input on this Community Involvement Plan. If you were unable to attend the open sessions at the St. Maries Library on June 17 and 18, and would like to schedule a telephone interview, please call Debra Sherbina at 1-800-424-4372, ext. 0247.

#### **Goals of EPA's Community Involvement Program**

EPA encourages meaningful community involvement. The goals of this plan are to:

- inform the public of current and planned site activities
- maintain open communication about site cleanup, ensuring questions are answered and concerns are addressed as they occur
- provide interested parties with useful information
- 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

## About the St. Maries Creosote Site

The St. Maries Creosote site is on the outskirts of the city of St. Maries, Idaho, along the south bank of the St. Joe River, in Benewah County. The site is within the boundaries of the Coeur d'Alene Indian Reservation. The facility operated as a creosote wood pole treating plant from the 1930s through the 1960s, and is currently being used for peeling, sorting and storage of untreated wood poles.

In February 1999, the City of St. Maries and Carney Products, Ltd., two of the site's potentially responsible parties (PRPs) dug up about 195 tons of debris and contaminated soil and moved it to a hazardous waste landfill. Since this removal action was finished, creosote has been observed intermittently in the river. It appears to be moving upward from the river bottom next to the site. Between 1998 and 2000, approximately 190 samples were taken to further evaluate site conditions. In November 1999, elevated levels of creosote were found in the St. Joe River sediments, particularly along the riverbank in front of the site. In December 2000, EPA proposed adding the site to the EPA National Priorities List (NPL) of the nation's most contaminated sites targeted for cleanup.

In August 2001, the city and Carney Products signed a Consent Order with EPA agreeing to conduct a site study and evaluate cleanup options. Another potentially responsible party, B. J. Carney and Company, failed to reach agreement with the other parties, and did not join the Consent Order. The city and Carney Products also agreed to repay EPA's past costs that had been incurred while responding to the site and reimburse EPA's costs of overseeing work under the Consent Order.

The site study is called a "Remedial Investigation/Feasibility Study" (RI/FS). It will define what types of contamination exist at the site, how much exists, and how far it extends. It will also evaluate the speed and direction any such

contamination is traveling, as well as conditions that allow for it to move. This information will be used to evaluate potential cleanup options for the site. EPA and the Coeur d'Alene Tribe will oversee the work, which is targeted for completion by the fall of 2003.

This July, the city and Carney Products began the Remedial Investigation. It will include sampling and testing of: surface and subsurface soil; riverbank soil; groundwater; surface and subsurface sediment; and surface water. The investigation will focus on the area of the former wood-treating facility and the river immediately north of the facility. If site-related contamination is found beyond this area, the boundaries of the study area will be expanded.

The city and Carney Products have looked closely at all existing site information to identify any data gaps. To date, they have submitted several documents. In consultation with the Coeur d'Alene Tribe, EPA has approved the Project Management Plan, Data Management Plan, and the Summary of Data Gaps Report. EPA has also approved the Final Remedial Investigation/Feasibility Study (RI/FS) Work Plan and Sampling and Analysis Plan, which included the Field Sampling Plan and Quality Assurance Project Plan.

At this time, EPA is delaying a final decision on its proposal to add the St. Maries site to the National Priorities List, while the RI/FS is conducted. Listing still remains an option for the future. As part of the listing deliberations, EPA will evaluate whether to designate the site a "Superfund Alternative" site. The principle of a Superfund Alternative response action is to provide the same level of cleanup as if the site were listed on the NPL. Future decisions on listing will depend on the type of cleanup remedy that is identified for the site, as well as the willingness of the potentially responsible parties to voluntarily do the cleanup.

## Current Community Concerns

In preparation for this community involvement plan, EPA sent an announcement to our 100-address mailing list in June 2002. We invited people to participate in interviews with EPA representatives. The interviews helped EPA to understand community concerns and how citizens would like to be involved in the investigation and cleanup process. Comments were gathered from representatives of the City of St. Maries, the Coeur d'Alene Tribe, the Idaho Congressional delegation, Carney Products Company, Ltd., and several local residents and concerned citizens. *Fourteen people have participated in the interviews to date, and additional comments are welcome.*

**(See Appendix for complete list of comments.)**

### Recommendations for Community Involvement

In general, people felt it was important for EPA to keep them regularly informed about site issues, including communicating sampling results. Some commentors said they preferred fact sheets to public meetings. Several commentors found EPA fact sheets manipulative and not timely, and said they would like public hearings. All respondents emphasized the need for accurate and complete information.

### Concerns about Contamination

The majority of commentors said the site was small and they felt that any contamination present did not pose any serious health or environmental risks. Many voiced the concern that the cleanup would be too expensive for the City of St. Maries. The Coeur d'Alene Tribe is concerned about ecological risks posed by the site.

## Planned Community Involvement Activities

EPA will continue to prepare and distribute information on site activities. Public officials and the press will be briefed. EPA will communicate sampling results to the public, and hold public informational meetings at major project

milestones. This Community Involvement Plan will be updated and more information provided as necessary during the cleanup process.

Some of the tools that EPA plans to use to keep the community informed and involved in the activities at the site are listed below. The level of community interest will be closely monitored and activities can be adjusted based on the feedback we receive. **This list can be updated at any time and EPA welcomes additional suggestions.**

### Fact Sheets

Fact sheets and other materials summarizing site activities, technical documents and reports will be mailed to EPA's St. Maries mailing list. *Please call Debra Sherbina at (206) 553-0247 if you would like to be included on, or deleted from, this list.*

### Information Repository

The purpose of an information repository is to make site information accessible and available for public review. All technical documents and reports will be placed in the Information Repository located at the *St. Maries Public Library, 822 W. College Avenue, St. Maries, Idaho 83861, phone: (208) 245-3732.*

### Public Meetings

Public meetings will be used to provide important site information, including sampling results, at key project decision points. All public meetings will be announced in advance in future fact sheets and notices in the *St. Maries Gazette-Record.*

### Internet Website

A website on the St. Maries site activities is located at <http://www.epa.gov/r10earth>. Click on "Index," then click on "S" to locate the site name.

*Additional Community Involvement Resources are Available, if Requested*

### Technical Assistance Grants

A Technical Assistance Grant (TAG) is available for any site proposed to the Superfund National Priorities List. As a proposed site, St. Maries is eligible for a grant. The grant provides funds to citizen groups that are affected by Superfund. Citizen groups can apply for grant money to hire technical advisors to help interpret and explain technical materials produced as part of the investigation and cleanup process.

TAGs up to \$50,000 are available from EPA. A local share contribution of 20% of total program cost is required. Groups can count the value of volunteer services and contributions of supplies (called "in-kind contributions") toward the required 20% match. To receive more detailed information about TAGs and eligibility, please call **Marianne Deppman, EPA Region 10 TAG Coordinator, at (206) 553-1237, or toll-free at 1-800-424-4372, extension 1237.**

### Workshops

Informal workshops can be arranged to provide more information about EPA's cleanup process. None are planned at this time. However, citizens may request information on such topics as: Sampling Techniques, Potential Health and Environmental Risks Associated with the Site, and an Overview of the Superfund Cleanup Process.

### **EPA community involvement activities to date:**

- ◆ an information repository is being established at the St. Maries Public Library to house site-related documents for convenient community review.
- ◆ a site mailing list has been generated and will be updated regularly.
- ◆ three fact sheets have been distributed: December 2000, September 2001, and May 2002
- ◆ community interviews were conducted in June 2002 to gather feedback for this plan.
- ◆ a web page has been developed to keep citizens informed of site activities.

### **Potential Health and Environmental Concerns**

Previous tests show three sources of creosote contamination at the St. Maries Creosote Site: soil and groundwater contamination at the former wood treating facility, contaminated soil in the river bank, and contaminated river bottom sediments. This contamination could potentially affect sensitive animal habitat and endangered fishery resources in the St. Joe River. It could also potentially pose a human health concern. Long-term exposure to low levels of creosote can cause skin damage, such as blistering or peeling. Long-term exposure to higher levels of creosote and direct contact with the skin can cause cancer. Data collected during the investigation will be evaluated to find out whether people, animals, or fish could be affected.

#### *ATSDR Involvement*

The Agency for Toxic Substances and Disease Registry (ATSDR) is a federal agency that determines whether people have harmful effects from exposure to chemicals from hazardous waste sites. Under the Superfund law, ATSDR is required to complete a public health assessment for sites proposed to the EPA National Priorities List. When appropriate, ATSDR can also provide health education for communities and other activities. ATSDR has a cooperative agreement with the Idaho Division of Health/Bureau of Environmental Health and Safety (BEHS). BEHS conducts many ATSDR activities in Idaho.

A public health assessment reviews available information about hazardous substances at a site and evaluates whether exposure to them might harm people. Public health assessments consider:

- ➔ what the levels of hazardous substances are
- ➔ whether people are actually exposed to contaminants through air, water or food
- ➔ what harm the substance might cause at the expected exposure level

To complete the health assessment, health agency staff look at environmental data, health data (including available information on community-wide rates of illness), and community health concerns. Public health staff will conduct a public availability session for the St. Maries site and will be sending out information on the date and location.

## Appendix: Notes from Community Interviews

The following comments were gathered from community interviews held on June 17 and 18, 2002 at the St. Maries Public Library.

Local officials asked to describe the community said it was small (about 2,600 people), picturesque, and rural. The high unemployment rate and local economic problems were highlighted. People in the community were described as hard-working, and it was mentioned that many retirees live in the St. Maries area. The main industries are logging and tourism.

### Recommendations for Community Involvement

#### Citizens' Comments:

I first heard about this site in 1998, when the creosote sheen on the river was reported.

I like the fact sheets. They give a lot of detail, and work for me.

I would be interested in applying for a Technical Assistance Grant. I would like to be involved in a committee formed to review information. Maybe we can get deeper into the issues without all the animosity.

I have been hearing about the St. Maries site through the newspaper since 1998.

Fact sheets and newspapers are good ways to inform the public.

People here feel they don't have an impact on EPA decisions, and that EPA will go ahead and do what it wants regardless of citizen input.

Other community members aren't coming to these interviews because they think EPA is being foolish to waste tax money on such a little site.

I feel I can best provide EPA with information about the site, rather than the other way around, as I have lived here all my life. I was in St. Maries in 1938 or 1939 when wood treatment operations started. I was here when the tanks were put in and then later taken out and sold. My husband worked at the pole yard as an inspector for Cook Cedar until 1960.

I support and agree with all the things the person before me mentioned. [See paragraph above.]

I learned about the site four years ago when I was on the state legislature.

Fact sheets work best for me as a communication method.

I like newspaper articles as a means of getting site information.

EPA's fact sheets aren't timely. They are manipulative, and deliberately use doublespeak and keep people uninformed. We do not like EPA's websites.

The EPA public involvement process is a sham. EPA is failing the taxpayers and it is your duty to respond to us as we pay your salaries. EPA needs to involve people on a real basis. These community interviews in St. Maries are not adequate, and are held at times when it is difficult for working people to attend.

We want public involvement throughout the cleanup process, and the opportunity to review technical documents, such as geological studies and the Hazardous Ranking System data.

Why is EPA giving special treatment to the Coeur d'Alene Tribe? We ask you to clarify what it means when your EPA website refers to the Coeur d'Alene Tribe establishing their own water quality standards for the St. Joe River.

We have been told repeatedly that water quality standards are federal, and that enforcement will either be by the Tribe or the State. We have asked often whether TAS ["treatment as a state"] has been granted, and we seem only to get evasive, unclear or "double-speak" answers. We believe we have a right to know, and we request that you give us direct answers as to the status of the Tribe's TAS application. What about the rights of private land owners? We are frustrated that we have no voice in the public involvement process.

We are stunned that EPA has already worked with the Coeur d'Alene Tribe. EPA is clearly aligned with and collaborating with the Tribe, and this "raises a flag" with us. What about consulting with the public? Where and when would public input be heard?

What about Carney Products and the little City of St. Maries? EPA is a bully and can ruin livelihoods. This cleanup could ruin the St. Maries economy. How dare you do this?

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*Comments from local officials, Carney Products, and the Coeur d'Alene Tribe:*

The two potentially responsible parties, Carney Products, Ltd., and the City of St. Maries preferred fact sheets and newspaper articles over public meetings as a communication tool. They were sensitive about keeping costs down.

We would like to make it clear to the community that Carney Products and the city are cooperating to pay for site cleanup, and B. J. Carney Co. is not. We would like this highlighted more in EPA fact sheets.

The Tribe first heard about the site four years ago, when the spill was reported.

EPA has been responsive to the Tribe's concerns and we have been kept informed. We have been reviewing fact sheets and technical documents, and will continue to do so as the site is on tribal land.

We would like to be involved in any public meetings EPA might plan in the future.

The City of St. Maries has had meaningful communication and a relationship with many government entities regarding the site: EPA, Idaho Department of Environmental Quality, the Bureau of Health, Congressionals, the governor's office, and the Coeur d'Alene Tribal Council. We will continue communicating.

We would like the opportunity to continue reviewing EPA public information documents (fact sheets, meeting announcements, newspaper advertisements) before the information goes public. EPA is doing a good job of keeping us in the loop.

I first learned about the St. Maries site in 2000, in a meeting held with other Congressionals to avoid listing the site on the National Priorities List.

I like the EPA fact sheets. Newspaper articles are a good way to notify the public, but also open up a forum for criticism of EPA. Would like EPA to keep Congressionals updated and informed regularly, with as much advance notice as possible.

Our interactions with the Coeur d'Alene Tribe have been very good. The Tribe has been helpful.

I learned about the St. Maries site in a newspaper article in 2000.

I sent a letter to Administrator Whitman last year and EPA has not been responsive to my concerns. I also introduced a state bill saying our state does not want EPA involvement.

EPA could better inform us by holding public hearings and publishing more articles in the local newspapers. I feel these community interviews are fake, and that our input is not really being heard or making a difference. We need more and better public involvement.

EPA is not being truthful with us. I have a tough time with EPA lying to the public to create more jobs for themselves.

**Concerns about Contamination***Citizens' Comments:*

There is a high poverty rate in this community and we are very concerned about cleanup costs. We are scared about the cost to our town. Please do the cleanup as economically as possible!

EPA is probably aware of this, but there is a strong layer of clay 25 feet down that would block creosote seepage.

I have a question about property ownership. The city does not have the title to the Public Reserve, where the site is located. Why, then, is the city a potentially responsible party?

I have lived here my entire life and do not see a health problem here. I have never seen a sheen on the St. Joe River. I do not think creosote is a problem.

If EPA digs and digs at the site, they will create a problem. There is too much regulation here.

Nature has the ability to revive itself. This little amount of creosote is nothing.

I don't think EPA should bother with this little site. Why after 74 years is there a concern? The city's money will be wasted for nothing.

My husband worked at the pole yard as an inspector for 29 years, and I used to wash clothing covered with creosote. Neither of us had any health problems.

EPA should be more concerned about the telephone poles and railroad tracks in the area that have been treated with creosote, than with the creosote at the site. We have been through seven floods over the years, which have covered the pole yard. The creosote is either washed out or diluted over time. During the wood treatment operation period, there were fumes all over town and no one got sick.

We have eaten fish from the St. Joe River and never experienced health effects from this.

If I had concerns about health issues, I would tell our local city officials.

I have lived in St. Maries since 1959, and noticed no particular health problems.

There is high unemployment in this community, and this cleanup could worsen the economic problems.

We don't need public meetings

Will EPA measure the dilution rate of creosote in determining an appropriate cleanup? This factor was not mentioned in your fact sheet.

Don't want the city to go bankrupt because of cleanup costs.

How is a "Superfund Equivalent" site different from an actual Superfund site? This sounds like EPA doublespeak to us. Since St. Maries is "Superfund Equivalent," EPA will not help fund, yet EPA and the tribe are heavily involved in the cleanup process.

This site is very small in comparison to other sites. How serious is the contamination? We request a copy of the background data, including how the site came to be ranked on the Superfund Hazardous Ranking System.

Was the site given special consideration because it is on the Coeur d'Alene Indian Reservation?

We want this cleaned up, but we want our land.

Why isn't the tribe a potentially responsible party? Isn't the site on their land?

The following section in EPA's latest fact sheet sounds like a veiled threat.

"At this time, EPA is delaying a decision on whether to list the St. Maries site on the National Priorities List, while the Remedial Investigation/Feasibility Study is conducted. Listing still remains an option for the future. Future decisions on listing will depend on the type of cleanup remedy that is identified for the site, as well as the willingness of the potentially responsible parties to voluntarily do the cleanup."

Do NOT list this site on the Superfund list is the vote from our household; the innocent have already paid mightily for this "cleanup." Sorry we can't be at your shortened schedule in St. Maries to voice this in person.

Since I no longer live in Idaho, I'm a bit reluctant to comment on the situation there. However, I was born in St. Maries, graduated from high school there, and worked at the sawmill in the mid 50's. While I didn't work at the creosote treatment facility, I am familiar with some of the work they did when I lived there. At that time the Carney Pole Company was considered an asset to the community. Steel posts were expensive so many farmers and others needing to fence fields and private property, took their wood posts to have the bottom three feet treated with creosote. They were less prone to deterioration which saved money in fence replacement. At that time most of the work seemed to be treatment of telephone poles. I doubt that anyone in the community or those running the company had any knowledge that the creosote could possibly contaminate the ground to any detriment or get from the facility to the river in quantities sufficient to cause anyone any problems. Only in the last 15-20 years have we found that just about any product we use, eat or drink can cause cancer. I'm not aware of anyone getting ill from using treated pole products or from eating fish from the river near the site. I have caught and eaten fish from around the log booms along that area and never experienced any physical problems at all.

I don't know how the laws are written concerning contaminated site cleanup and who is responsible to pay for that cleanup. If the law, and resulting regulations, result in levying millions of dollars of cleanup cost against a small town like St. Maries and what I assume to be a small company or companies who actually did business at the site, while unknowingly creating a hazardously contaminated site, then that is an unjust law and it and the regulations need to be changed. Shouldn't the power companies who bought the treated poles bear some shared responsibility? Shouldn't every power company customer who relied on the treated power poles to provide the distribution lines to assure reliable transmission of power bear some shared responsibility?

Please don't influence the government to place the burden of cleanup for a site like this on a few citizens who happen to live in St. Maries.

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*Comments from local officials, Carney Products, and the Coeur d'Alene Tribe:*

We do have concerns about the site as it is on the Coeur d'Alene Reservation. This is why we are closely involved in the Remedial Investigation/Feasibility Study, and will continue to be involved. We need to do a thorough, comprehensive evaluation at the creosote site so we can see what is there, and if it is impacting the environment. Our concerns are mainly ecological, as human use of the site (fishing or swimming) is minimal.

I think we are moving in the right direction by not listing the site, but we will have to see how future funding issues develop.

The Superfund process is lengthy and onerous, and the tribe is concerned it is taking so long to clean up such a small site. We are looking forward to helping develop the cleanup plan.

I feel the community is reasonably satisfied that the cleanup will be taken care of. My impression is that, overall, citizens are not concerned with site impacts on health or the environment.

Time is of the essence in this cleanup. We need to clean up the site effectively and quickly, and reduce unneeded expenses.

Carney Products is currently in litigation against B. J. Carney Co., but we will not wait for litigation to conclude before addressing site cleanup. We are committed to a quick and complete cleanup regardless of the outcome.

We do not have health concerns related to the site, and have heard no such concerns from the community.

We prefer to do the cleanup ourselves and do not want listing.

We are working closely with EPA and the Coeur d'Alene Tribe to keep the cleanup as practical, effective and economical as possible, and want to continue this trend.

We would like EPA's help in getting B. J. Carney Co. to step up to the plate.

From what I have seen and heard, there are few ecological or human health risks at the site. However, the study needs to be done to find out what is there. I do not want to see the City of St. Maries go bankrupt, and the cleanup could be expensive depending on what is found and what technologies are used. B. J. Carney Co. should take responsibility also.

I have visited the site and it is very small. I have boated on the St. Joe River near the site and have never seen a creosote sheen on the water. I have no health concerns related to the site; I think there is more potential contamination from the creosote-treated railroad tracks in the area. Lots of people fish off piers where visual contamination is more evident.

It concerns me that St. Maries is "Superfund Equivalent." This means there is no federal funding and paying for cleanup could hurt the city economically. What will EPA bill the city when the cleanup is finally finished?

**Other issues were identified that are outside the immediate scope of EPA's proposed cleanup project for the St. Maries site, but are included in order to capture all comments and provide background information about other issues in the area:**

*Citizens' comments:*

Land issues are brewing worse than ever in the Coeur d'Alene Basin. They could explode.

What guarantee to we have that EPA will do anything differently here than in the Basin?

We are very concerned about the community involvement process since we know that our stakeholder inclusion was not allowed during the crucial, early days of the Union Pacific planning. We are also very concerned about the lack of alternatives provided by EPA for the railroad CERCLA Response. To offer only two alternatives – build a trail or do nothing – violates the CERCLA right to have various alternatives considered. Ours was never allowed. We do not want to see this happen in St. Maries.

*Local officials' comments:*

The science that EPA used in the Silver Valley was fake. It benefitted EPA, not the community. This is criminal.

What EPA did to the Silver Valley was not right – it destroyed their economy. The same thing could happen in St. Maries.

**Individuals Interviewed:**

Citizens:

Ben Clouser  
Dean Gentry  
Herb Glidden  
Dan Hanneman  
Roger Hardy  
Toni Hardy  
June Judd  
Mary McLeod

Local Officials and Others:

Jim Comerford, Carney Products, Inc.  
Mayor Robert Allen, City of St. Maries  
Nancy Wolff, St. Maries City Attorney  
Phil Cerner, Coeur d'Alene Tribe  
Sara Bigger, Senator Crapo's Office  
Representative Dick Harwood  
George Currier, St. Joe  
Development Foundation