Animal Protection and Welfare Society • Arise for Social Justice • ASARCO Ex-Workers Group • Breast Cancer Fund • Calhoun County Resource Watch • Canton Advocates for Responsible Expansion • Center for Community Action and **Environmental Justice • Center for Health, Environment & Justice • Chemical** Weapons Working Group • Citizens Against Toxic Exposure • Citizens Awareness Network • Citizens' Environmental Coalition • Citizens for the Cleanup of Lower Darby Creek • Citizens for Safe Water Around Badger • Community, Health and Environmental Coalition • Coalition to End Childhood Lead Poisoning • Concerned Citizens of Lake Township • Creating Health Institute • Creating Healthier Learning **Environments Through Education & Awareness • Church Women United of NYS** Tufts University School of Medicine • Don't Waste Arizona • Environmental Alliance of North Florida • Environmental Association for Great Lakes Education • Clean Air Coalition of Western New York • Edison Wetlands • Edmonds Institute • Farmworker Association of Florida • Fingers Lakes Citizens for the Environment • Finger Lakes Zero Waste Coalition • Fundacion Aguaclara • Global Community Monitor • Glynn **Environmental Coalition • Graduate Student Environmental Forum • Grassroots** Environmental Education • Greenaction for Health & Environmental Justice • Green Delaware • Green Science Policy Institute • Healthy Child Healthy World Huntington Breast Cancer Action Coalition • Help Our Polluted Environment • Hope for Kids • Idaho Sporting Congress • Indigenous Environmental Network • Institute of Neurotoxicology & Neurological Disorders • Institute for Health and the **Environment • International Physicians for Humanitarian Medicine • Just Transition** Alliance • Kids for Saving Earth • Norry Neighbors • Nuclear Information and Resource Service • Nuclear Watch South • Oregon Center for Environmental Health Oregon Physicians for Social Responsibility • PC PRIDE • Parents Fighting for a Healthy and Safe School • People's Action for Clean Energy • People's Alliance for Clean Energy • Prevention Is The Cure • Protect All Children's Environment • People Organized in Defense of Earth & her Resources • Projects for Environmental Health, Knowledge, & Action • Riverkeeper • Rochestrians Against the Misuse of Pesticides Save the Pine Bush • Silicon Valley Toxics Coalition • Toxics Action Center • US Environmental Watch • Victims of TCE Exposure • Women's Environmental Institute Women's Voices for the Earth

Mathy Stanislaus, Assistant Administrator, Superfund Program U.S. Environmental Protection Agency OSWER
1200 Pennsylvania Avenue NW
Washington, DE 20460-0001

Charles Lee, Director, Office of Environmental Justice OECA 1200 Pennsylvania Avenue EPA, Washington DC 20460

January 26, 2010

Dear Mr. Stanislaus and Mr. Lee:

We are writing about the remediation plans for the Bunker Hill Mine and Metallurgical Federal Superfund site, located in Shoshone County in Northern Idaho. We strongly urge your agency to halt the process to site a waste repository at the Old Mission at Cataldo. In addition, we urge EPA to correct the environmental injustices of the past when an unsafe remediation plan was decided on by your agency under the Bush Administration, by moving forward to reopen the site Record of Decisions and establish a health-protective cleanup plan. We request that EPA hold a meeting with the impacted community and the many concerned community and environmental organizations about this request.

As you may know, the Environmental Protection Agency (EPA) and Idaho Department of Environmental Quality (IDEQ) are proposing that the remediated waste from one of the nation's largest Superfund site be disposed of in the same region which has already suffered for decades from Bunker Hill Mine's lead pollution. Over 2,000 residents, doctors, policymakers, environmental, environmental justice, civic and health organizations are strongly opposed to this proposal for important public health, environmental, environmental justice and cultural preservation reasons. The Coeur d'Alene Tribe's ancestors built the Sacred Heart Mission with Jesuit priests and established a reservation at the proposed site in the late 1800's. Today, the Mission is a National Historic Landmark. Flooding has occurred in this area every year since 1848. Clearly, flooding of a waste site would cause continual problems with spreading pollution. Residents in this region have already been exposed to lead from the Bunker Hill mining operation. This community had suffered the most extensive case of childhood lead poisoning from industrial pollution that has ever been recorded in the United States. Sadly, the environmental injustices suffered by this community continue. Lead contamination still remains in many homes posing daily health threats to residents. Testing found lead levels in homes range from 2,000 to 52,000 parts per million (ppm) notes the long-standing Silver Valley Community Resource Center (SVCRC).

Your agency and IDEQ are proposing a 19 acre toxic waste repository that will hold over 600,000 cubic yards of waste at the Old Mission at Cataldo. In addition to this site being an unacceptable location, your agency's public participation and siting process have been flawed. In June, 2007, the agencies released their proposal for public comment with a July 6th deadline. In less than a week, over 500 people and organizations came out in opposition and submitted a petition. However, on June 25th, the agencies inappropriately began excavation work at the site—ten days before the end of the public comment period. We urge EPA to withdraw Old Mission from the list of possible sites and hold a community meeting for all affected citizens living in the Basin area.

However, the larger problem is the overall process to determine the remediation method at the Bunker Hill site which was poorly done by EPA under the Bush Administration. It was a misguided decision to excavate lead waste and just take it to a repository in the same regional community. It was also a travesty for the agencies to move slowly on cleaning up the many homes that are polluted with lead, and to establish an unsafe cleanup level for

lead of 1,000 ppm. Lead is a well-documented toxic chemical which poses significant health risks at this level.

The residents of Shoshone County have suffered for too long from the environmental injustices of lead pollution from the Bunker Hill mining operations, and now from the state and federal agencies that have delayed residential cleanups, established unsafe cleanup levels, and propose to site the waste repository at Old Mission at Cataldo. We urge EPA to reopen the Bunker Hill site Record of Decisions to reassess, with full community involvement, the most health-protective way to remediate the site, including: 1) a full evaluation of other treatment technologies; 2) revising cleanup levels so they are protective of children; 3) instituting timely remediation of contaminated homes; and 4) assisting SVCRC to acquire funding for a Community Lead Health Center that is desperately needed in the area.

Thank you for considering the views of many national, regional, state and community organizations. We look forward to hearing from you. Please send a response to the Center for Health, Environment & Justice, P.O. Box 6806, Falls Church, Virginia 22040 and anne@chei.org

Sincerely,

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