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Panhandle Health District

MEMORANDUM

TO: Site File

FROM: IDEQ: Rob Hanson *RH*
EPA: Anne McCauley *AM*
PHD: Andy Helkey *AH*

DATE: October 24, 2017

SUBJECT: Residential and Commercial Carpeting Disposal Policy
Bunker Hill Mining and Metallurgical Complex Superfund Site

This memorandum documents the joint determination by the Idaho Department of Environmental Quality (DEQ), the Environmental Protection Agency (EPA), and the Panhandle Health District Institutional Controls Program (PHD) regarding appropriate disposal of residential and commercial carpeting within the Bunker Hill Superfund Site (BHSS).

Previous Waste Acceptance Criteria allowed for disposal of potentially contaminated carpeting in BHSS repositories. In 2017, DEQ and PHD conducted sampling to determine arsenic and lead Toxic Characteristic Leaching Procedure (TCLP) properties for carpet from residential and commercial properties located within the Box and Basin of the BHSS. Samples of carpet and pad materials from both residential and commercial properties were collected to represent a variety of carpet types and ages. Laboratory arsenic and lead TCLP analytical results for all carpet samples collected were below associated regulatory levels which define characteristic hazardous wastes based on toxicity. Sampling methods and results are documented in *Carpet Sampling Results for Disposal Determination, Bunker Hill Superfund Site Memorandum*, dated October 10, 2017.

Sampling results indicate lead and arsenic concentrations of leachate from representative carpet samples do not exceed EPA's threshold concentrations for acceptance into standard municipal landfills. For this reason, residential and commercial carpeting and associated pads will no longer be accepted at BHSS repositories, which are reserved for mining metals contaminated materials.