



State of Idaho
Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706



U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

March 23, 2017

Memorandum

From:


Anne McCauley, EPA Remedial Project Manager


Rob Hanson, IDEQ Mine Waste Program Manager

To: Bunker Hill Superfund Site Operable Units 1-3 Files

Subject: Policy Statement for Bunker Hill Superfund Site in regard to the July 1, 2016 OLEM Directive 9200.1-128 "Recommendations for Sieving Soil and Dust Samples at Lead Sites for Assessment of Incidental Ingestion". The policy can be found at <https://sempub.epa.gov/work/HQ/100000133.pdf>.

EPA issued the above reference Policy Statement in July of 2016. The recommendation is to use a No. 100 sieve for soil at lead cleanup sites to produce a fine fraction of <150 μm . This size fraction has been found to be most representative of the particles that are likely to stick to children's hands and other objects that could subsequently be ingested.

The Policy notes that this recommendation should be considered on a site-specific history. The size fraction used at the Bunker Hill Superfund Site since the 1980s has been the <177 μm using a No. 80 sieve. This size fraction was used for site risk assessments and soil sample analysis to make remedial action decisions leading to remediation of over 6,000 properties.

The following is stated on page 4 of the Policy: "Soil and house dust samples in the <175 μm fraction collected from the Bunker Hill Superfund Site in Kellogg, ID have been used in the IEUBK model (after an initial calibration) to accurately and consistently predict PbB levels in the community for more than 15 years (von Lindern et al., 2003; PHD, 1986; Snee, 1982; Yankel et al., 1977)." (The Policy appears to round the No. 60 mesh the nearest 5.)

Based on this information, EPA Region 10 RPMs and Idaho IDEQ managers, in consultation with site risk assessors, have decided to continue to use the No. 80 sieve size at the Bunker Hill Superfund Site. This is consistent with the flexibility in the Policy Statement.