REGION 10
SEATTLE, WA 98101

May 29, 2025

Jess Byrne
Director
Idaho Department of Environmental Quality
1410 N. Hilton Street
Boise, Idaho 83706

Re: Gilmore Mine Waste Piles Site

Dear Director Byrne:

Over approximately the past eight years, our agencies have worked to understand conditions and determine options for addressing significant contamination at the Gilmore Mine Waste Piles site ("Site") near Salmon, Idaho, including potential proposal to the Superfund National Priorities List (NPL).

As documented in the June 2023 Agency for Toxic Substances and Disease Registry (ATSDR) Health Consultation, there are significant risks to public health due to the high levels of lead contamination at the Site. EPA has shared on several occasions the belief that listing on the NPL is the best tool for completing necessary investigations and long-term cleanup actions to address the arsenic and lead contamination. The Superfund process would allow for comprehensive long-term solutions to address site contamination and the associated risks to public health and the environment.

As you know, EPA has implemented temporary actions to control the spread of contamination, completed sampling events to gather additional data, and conducted numerous activities focused on community engagement, outreach and education with stakeholders in collaboration with the Idaho Department of Environmental Quality (DEQ). A list of these activities is included as Appendix A.

In February 2024, a meeting was held in Boise with then DEQ Deputy Director Kristin Ryan and DEQ program managers to continue discussions regarding further coordination with the State of Idaho related to the Site. The status of activities at the Site and options for comprehensively addressing contamination—including potential proposal to the NPL—were discussed. Ms. Ryan expressed DEQ's concerns that a sense of local support for NPL proposal had not yet been achieved, and that more time was needed to conduct additional outreach to the community and stakeholders.

In my April 16, 2024, letter to you, I acknowledged Ms. Ryan's concerns and DEQ's request for additional time to conduct further outreach efforts focused on educating the community about the potential risks and cleanup options for addressing contamination, including proposal of the Site to the NPL. Given that my resources are limited, I shifted priorities and directed resources to focus to other high-priority contaminated sites within Region 10, while DEQ focused on completing these additional

community engagement efforts. I also requested DEQ to reengage with EPA when the State was ready to resume discussions regarding comprehensive cleanup of the Site.

On September 11, 2024, EPA received a copy of a letter from DEQ to the Lemhi County Commissioners responding to an August 2024 letter from the Commissioners, which also included a citizen petition from Gilmore residents, requesting that federal and state environmental agencies cease any efforts related to potential NPL listing, soil removal actions and/or dust suppression activities. In that letter, DEQ committed to:

- Cease sampling of public or private property and providing information about potential options or opportunities to clean up the contamination, unless specifically requested by property owners;
- Providing a copy of the petition and Commissioner's letter to federal and state agencies;
- Not participating in future public outreach events such as the "Soil Shops" or community meetings;
- Responding to individual landowners concerns about lead, arsenic, and other metal contamination as well as questions about reducing exposures to metals when spending time at Gilmore;
- Providing support as the Idaho Department of Health and Welfare (IDHW) seek funding opportunities and explores options to install information kiosks outside of the Gilmore townsite; and
- Continuing to share all information which could benefit the citizens of Lemhi County.

EPA continues to believe that the Site poses significant risks to public health due to the high levels of lead and arsenic contamination, and that listing the Site on the NPL is the best option for comprehensive cleanup and addressing human health exposures given that no other alternatives have been proposed at this time. However, EPA understands the community is not supportive of NPL listing or any further federal engagement at this time.

Given the community's position, EPA considers it now appropriate to designate the Site as "Other Cleanup Activity – State Lead" (OCA) in EPA's Superfund Enterprise Management System (SEMS). As is our normal practice for sites designated as OCA, EPA will check in periodically to assess the State's progress in addressing high risk sites.

It is EPA's understanding that IDHW is currently developing a health consultation using data collected during EPA's sampling efforts. The consultation may enable IDHW to identify and prioritize follow-up activities to protect public health at the Site. EPA encourages DEQ to consider recommendations from the 2023 ATSDR Health Consultation, as well as this IDHW health consultation to protect the residents and other users of the Site.

I look forward to continuing our partnership and identifying, assessing, and finding solutions for additional sites in Idaho that pose a threat to human health and the environment. If you have

questions or need additional information about the roles of our respective agencies for the Site, please do not hesitate to contact me, terada.calvin@epa.gov or 206-553-4141, or Brian Husmillo, Site Assessment Manager, husmillo.brian@epa.gov or 206-553-1152.

Sincerely,

CALVIN TERADA

Digitally signed by CALVIN TERADA
Date: 2025.05.29 08:07:54 -07'00'

Calvin J. Terada
Division Director

cc: Michael McCurdy
Waste Management and Remediation Division Administrator
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Troy Saffle
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Idaho Department of Health and Welfare

Rhonda Kaetzel
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Appendix A

Gilmore Mine Waste Piles community engagement, outreach, and education with the Site stakeholders, such as Lemhi County Commissioners, property owners, visitors, elected officials, and other state and federal agencies has been a major area of focus for EPA, in collaboration with DEQ. In addition to several direct mailings by DEQ to property owners, EPA has led or provided support to DEQ during community and stakeholder events which include:

- Gilmore Townsite SoilSHOP – July 23, 2022
- IDEQ Gilmore Townsite Survey – March 17, 2023
- Gilmore Townsite Survey Open Houses – March 27 – 29, 2023
- Lemhi County Commissioners Meeting (Survey Results) – May 22, 2023
- Lemhi County Commissioners Meeting (ATSDR Health Consultation Report) – June 26, 2023
- ATSDR Health Consultation Report Open Houses – June 27 – 28, 2023
- EPA Sampling Event – July 8 – 13, 2023
- EPA Sampling Event – August 10 – 13, 2023
- EPA Road Dust Control Measures – August 17, 2023
- EPA Road Dust Control Measures – July 22, 2024