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RECLAMATION

Boise River Basin Feasibility Study

Specialist Report:

Hazardous and Toxic Materials

Boise Project, Idaho

Interior Region 9: Columbia Pacific Northwest

Mission Statements

The Department of the Interior (DOI) conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people, provides scientific and other information about natural resources and natural hazards to address societal challenges and create opportunities for the American people, and honors the Nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities to help them prosper.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Acronyms and Abbreviations

Acronym or Abbreviation	Meaning
BMP	best management practice
EPA	U.S. Environmental Protection Agency
HD	Highway Department
IDAPA	Idaho Administrative Procedures Act
IDEQ	Idaho Department of Environmental Quality
IGS	Idaho Geological Survey
PCB	polychlorinated biphenyl
Reclamation	Bureau of Reclamation
RV	recreational vehicle
SDS	safety data sheet
SPCC	spill prevention, control, and countermeasure
UST	underground storage tank

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1 Introduction

The Boise River Basin Feasibility Study is a feasibility study to evaluate increasing water storage opportunities within the Boise River basin by expanding Anderson Ranch Reservoir. The project is located at Anderson Ranch dam and reservoir, the farthest upstream of the three reservoirs within the Boise River system and located 28 miles northeast of the city of Mountain Home in Elmore County, Idaho. Anderson Ranch Dam is a zoned earth fill embankment structure that provides irrigation water, flood control, power generation, and recreation benefits. The reservoir also provides a permanent dead storage pool for silt control and the preservation and propagation of fish and wildlife. Anderson Ranch Dam is operated by the Bureau of Reclamation (Reclamation). Reclamation, in partnership with the Idaho Water Resource Board (IWRB), proposes to raise Anderson Ranch Dam. New water storage would provide the flexibility to capture additional water when available, for later delivery when and where it is needed to meet existing and future demands. The alternatives analyzed in this document include the No-Action Alternative (Alternative A), a 6-foot raise of Anderson Ranch Dam (Alternative B), and a 3-foot raise of Anderson Ranch Dam (Alternative C).

Alternative A provides a basis for comparison with the two action alternatives, Alternative B and Alternative C. Under Alternative A, current baseline conditions would continue, without increasing Anderson Ranch Dam height or constructing associated reservoir rim projects, access roads, or facilities. The expected project duration of Alternative B is approximately 51 months and Alternative C is 44 months. Reclamation would continue existing operations of Anderson Ranch Dam. Alternative B proposes to raise the dam by 6 feet from the present elevation of 4196 feet to 4202 feet to capture and store approximately 29,000 additional acre-feet of water. Alternative B would inundate an estimated 146 acres of additional land around the reservoir above the current full pool elevation of 4196 feet. Alternative C proposes to raise the dam by 3 feet to 4199 feet, allowing for the ability to capture and store approximately 14,400 additional acre-feet of water. Alternative C would inundate an estimated 73 acres of additional land around the reservoir above the current full pool elevation of 4196 feet.

Each of the two action alternatives, Alternative B and Alternative C, includes two separate, but similar, structural construction methods for the dam raise, downstream embankment raise, or mechanically stabilized earth wall raise. Otherwise, the only difference is the dam raise elevations of 6 feet for Alternative B and 3 feet for Alternative C. Project areas and construction durations for each method are nearly identical, except for a 200-foot difference in approach road length at the right abutment and an approximate 1-month difference in construction duration. The longer road length is within the dam footprint on previously disturbed ground. Because these differences are negligible, they are not differentiated within the analysis of each alternative. Alternative analysis assumes the longer road length and

construction duration, however, a final construction method will be chosen during later phases of engineering evaluation.

Chapter 1 and Chapter 2 of the Boise River Basin Feasibility Study Environmental Impact Statement (EIS) provide a detailed description of the proposed action, project's purpose and need, project area, and alternatives including design features applicable to the action alternatives. This specialist report supports the analysis of expected impacts on hazardous and toxic materials as described in the EIS.

1.1 Regulatory Framework

These are the primary regulations that are applicable to this resource area.

- Idaho Department of Environmental Quality (IDEQ) Rules and Standards for Hazardous Waste described in Idaho Administrative Procedures Act (IDAPA) 58.01.05.
- Resource Conservation and Recovery Act.
- Comprehensive Environmental Response, Compensation and Liability Act.
- Federal Insecticide, Fungicide, and Rodenticide Act.

2 Affected Environment

The project area relating to Alternative B and Alternative C refers to the general vicinity in and around Anderson Ranch Reservoir extending downstream to the extent of Arrowrock Dam, via the South Fork Boise River.

IDEQ governs the management of hazardous materials and waste in Idaho. IDEQ, through rules and standards, defines hazardous waste as having properties that make it dangerous or potentially harmful to human health or the environment. Hazardous wastes can be liquids, solids, contained gases, or sludges. They can be by-products of manufacturing processes or simply discarded commercial products, such as cleaning fluids or pesticides.

Potential sources of hazardous materials and wastes may exist in the project area or may be introduced by project activities. Hazardous materials may be present in a variety of common contexts, including the following.

- Construction and demolition debris
- Drums containing hazardous materials
- Landfills or solid waste disposal sites
- Pits, ponds, or lagoons
- Wastewater and wastewater treatment plants
- Fill, dirt, depressions, mounds, and contaminated aggregate
- Pesticides, including herbicides, insecticides, and fungicides
- Explosives
- Fish hatcheries
- Underground and aboveground storage tanks
- Septic systems and drainfields
- Stormwater runoff structures
- Transformers that may contain polychlorinated biphenyls (PCBs), also utility poles
- Abandoned mines
- Other documented environmental investigation or remediation sites.

The presence or absence of each of the types of hazardous materials and wastes within the project area are described in the subsections below.

Construction and Demolition Debris

Construction and demolition debris can contain hazardous materials or waste such as treated wood, paint, and solvent wastes. If construction materials are not properly managed or

disposed of, they can leach these materials into the environment or contact people through construction dust, or particles. Construction wastes cannot be disposed of in Pine, Idaho; they must be taken to approved Elmore County locations (Elmore County, 2018). Stockpiling and staging areas for the placement of construction materials exist next to the dam and one near the Dixie borrow pit location.

Drums

Drums are metal or polyethylene containers, usually 55 gallons in volume, that are often used to containerize and/or transport waste materials. Drums that are not stored properly have the potential to leak, releasing those materials into the environment. Drums containing hazardous materials may be associated with landfills, local businesses that containerize waste in drums, and environmental investigation or remediation sites. The research performed for this site did not identify any evidence for buried or aboveground drums in the project area.

Landfills or Solid Waste Disposal Sites

Landfills and other solid waste disposal sites may contain hazardous materials. Two solid waste disposal sites were identified within the project area. IDEQ has records of a solid waste management site named Pine Landfill (IDEQ ID: 2011BAZ5142, Solid Waste ID SW320011, Reference Site ID 4739). The IDEQ database identifies this site as about a mile southeast of Pine, upslope and east of the North Pine-Featherville Road by about a half mile (IDEQ, 2019a). Conversations with the citizens of Pine indicate that this landfill is closed and no longer used. IDEQ has no other records pertaining to this site (Robbins, 2019).

The Pine transfer station is located off North Pine-Featherville Road in the town of Pine. Citizens of Pine deposit their waste here in steel waste containers. The containers are picked up by Elmore County and taken to approved county landfill locations (Elmore County, 2018).

Pits, Ponds, or Lagoons

Research within the project area did not identify the presence of any pits, ponds, or lagoons used to store, dispose of, or remediate hazardous or toxic materials. Drainfields associated with the septic systems are discussed in a separate subsection below.

Wastewater and Wastewater Treatment Plants

Research within the project area did not identify the presence of any wastewater treatment plants. There are no municipal water or centralized wastewater services in the project area. Wastewater from homes and businesses is treated through septic systems located on individual property parcels. Septic systems are discussed in a separate section below.

Fill, Dirt, Depressions, Mounds, and Contaminated Aggregate

Both Alternative B1 and Alternative B2 require using fill material from borrow pits located in the project area. At least one, the Dixie borrow pit, is an existing borrow pit. At least three additional borrow pit areas are proposed to be sourced from downstream alluvial and fluvial deposits along the canyon slopes. These borrow areas are located along tributary drainages of

the South Fork Boise River and are along the north side of the existing Highway District (HD) 121 (River Road/Anderson Ranch Dam Road). One additional borrow area, the Riprap borrow area is a basalt talus pile along the toe of the canyon slopes downstream of Anderson Ranch Dam. Riprap used in original dam construction was produced from such sources. There are numerous talus piles along the canyon wall, but this location was selected for its relative ease of access. It is judged that the riprap can be borrowed from this area using mechanical equipment and does not require blasting (6-foot Engineering Summary in Appendix C of the EIS).

Research did not indicate that these borrow areas are currently near identified environmental sites or near any hazardous or toxic materials.

Pesticides, including Herbicides, Insecticides, and Fungicides

Sources of pesticides, including herbicides, insecticides, and fungicides may be agricultural lands within the project area. Only one agricultural area was identified within the watershed of the valley reservoir. The Deer Creek Berry Farm is located on Johnston Lane, off North Pine-Featherville Road, about 2 miles south of Pine.

Agricultural lands also exist at the height of land outside of the reservoir valley along the southeast edge of the reservoir valley. Pesticides, including herbicides, insecticides, and fungicides could potentially be used in the crop growing areas.

Explosives

No records were found for environmental investigation or remediation sites where explosives were a constituent of concern. Explosives have not been identified as necessary for modifications to the dam crest.

Fish Hatcheries

Research within the project area did not identify the presence of any fish hatcheries.

Underground and Aboveground Storage Tanks

An underground storage tank (UST) is defined as one or any combination of tanks and connective underground pipes used to contain regulated substances beneath ground surface. This does not include, among other things, tanks for storing heating oil for consumption on the premises or septic tanks (IDEQ, 2019a).

USTs and aboveground storage tanks are containers that store petroleum products or certain other hazardous liquids that can harm the environment and human health if released into the environment. USTs are subject to Idaho rules defined in IDAPA 58.01.07 and other federal regulations. Idaho has about 3,500 regulated USTs; there are about 561,000 nationwide (IDEQ, 2019a).

The IDEQ waste remediation facility mapper database identified six UST sites in the project area (IDEQ, 2019b). The USTs at five of the sites are documented as permanently out of use and removed from the ground through the IDEQ closure process.

The sixth UST is identified on the IDEQ underground storage tank database at Fall Creek Marina. The 3000-gallon storage tank was used as recently as 2016 to store gasoline for boats and recreational vehicles (RVs). This UST is listed as “temporarily out of use” in IDEQ records (IDEQ, 2019c). Verbal communication with the manager of Fall Creek Marina said that the tank is located adjacent to the road and was in use as recently as 2018. However, the marina no longer provides gasoline for boats or RVs.

Septic Systems and Drainfields

There is no municipal wastewater service in the project area. Wastewater from homes and businesses is treated through septic systems located on individual property parcels. Because septic systems treat human waste, inundation of these systems at the full pool height could cause waste concerns, including the spread of bacteria and viruses in groundwater.

All sewer facilities around the reservoir rim consist of private septic systems regulated by the Southwest District Health Department. The U.S. Forest Service owns and maintains five vault-style public restrooms at each of the public boat ramps (EIS Figure 2-7). Other than the septic tank at the Fall Creek Marina, no other septic systems are expected to be impacted by the action alternatives (EIS Chapter 2).

Stormwater Runoff Structures

There are no stormwater runoff structures in the project area.

Transformers that May Contain PCBs, also Utility Poles

PCBs are man-made organic chemicals that pose a risk to human health. PCBs were domestically manufactured from 1929 until manufacturing was banned in 1979 (U.S. Environmental Protection Agency [EPA], 2019). Electrical transformers and other electrical equipment manufactured before 1979 may contain PCBs. The rim analysis identified several underground structures and transformers owned by Idaho Power near Fall Creek. The exact age, nature, and depths of these structures is unknown.

Wooden utility poles may also be treated with preservatives that contain heavy metals or chemicals. Idaho Power provided information indicating potential impacts to overhead power and a 35-kilovolt single-phase underground primary cable in 3-inch conduit. Idaho Power infrastructure identified for relocation for reliability and maintenance purposes includes approximately 24 poles and associated overhead lines around the reservoir rim and an underground powerline and transformers in the Fall Creek area.

Abandoned Mines

The original townsite of Pine was in the current reservoir area and was a historic mining camp located on the South Fork Boise River (westernmininghistory.com, 2019). This area of Idaho saw significant mining activity in the late 19th and early 20th centuries.

The Idaho Geological Survey (IGS) maintains records of mine claims made in Idaho (IGS, 2019). Twelve historic mine sites/claims are documented near the reservoir. Only one, the Gertrude #1-#4 is within the area that may be inundated, near the Pine airstrip. During a

visual inspection of the area, no tailings or debris from the mine were visible. There is very little information about the mine claim.

Other Documented Environmental Investigation or Remediation Sites

A search of the EPA Superfund site list indicated that there are no Superfund sites in the project area. IDEQ lists one environmental site north of Pine. IDEQ documented environmental sites in the project area are all USTs, which are discussed in the specific section pertaining to USTs above.

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3 Environmental Consequences

3.1 Methods for Evaluating Impacts

This analysis addresses potential impacts associated completing the project with respect to hazardous or toxic materials. This analysis is based on a review of planning documents applicable to the project area, consultation with appropriate agencies, access of agency databases, and review of field reconnaissance reports.

The following table describes impact indicators and significance criteria for evaluating potential impacts from hazardous materials and waste.

Table 1. Hazardous materials and waste significance criteria

Impact Indicator	Significance Criteria
The disturbance of an existing hazardous material site resulting in a health risk to the public or environment	Cause a release of hazardous materials, substances or waste in excess of local, state, or federal regulations (e.g., EPA maximum contaminant levels, EPA regional screening levels, or applicable Idaho state screening levels)
The release of hazardous materials into the environment during construction activities, resulting in a health risk to the public or the environment	Cause a release of hazardous materials, substances or waste in excess of local, state, or federal regulations (e.g., EPA maximum contaminant levels, EPA regional screening levels, or applicable Idaho state screening levels)

The following methods were used to evaluate impacts.

- IGS mine records were reviewed to determine whether historical mines or tailings are within the project area.
- IGS oil/gas well location maps were reviewed to determine whether local oil and gas wells would be within the area of the dam raise.
- Septic tank, transformer, and utility pole records were reviewed to evaluate potential impacts.
- IDEQ records of documented waste sites were reviewed to determine whether sites exist in the project area.
- The EPA National Priorities List and Superfund sites list was reviewed to determine if federally identified hazardous waste sites exist in the dam raise area.

3.2 Direct, Indirect, and Cumulative Impacts

3.2.1 Alternative A – No Action

Under Alternative A, Reclamation would not modify Anderson Ranch Dam to increase storage capacity, storage levels would remain at the current capacity, Reclamation would continue to operate Anderson Ranch Dam under current standing operating procedures, no impacts to hazardous or toxic materials from the project would occur. No changes in existing Reclamation facilities, operations or maintenance are planned to occur that would directly or indirectly result in any increase in hazards, hazardous materials, or hazardous waste in the project area.

Environmental impacts from the current use, transport, and storage of hazardous materials associated with Reclamation operations and maintenance at Anderson Ranch Dam and Reservoir would be expected to continue. Hazards and toxic materials associated with landfills and other solid waste disposal sites, USTs, septic systems, and utilities would be expected to increase under current population and development trends in the project area. The No Action Alternative would not result in direct or indirect impacts to soil or geologic resources.

3.2.2 Alternative B – Anderson Ranch Dam Six-Foot Raise

Effects Due to Construction Activities

Project construction and operation would involve transporting, using, or storing hazardous materials such as fuels, oils, and solvents for equipment. In addition, fuels, oils, and solvents would be used to operate earth-moving equipment during construction. Constructing, operating, and maintaining project facilities and infrastructure would require using potentially hazardous materials such as paint, concrete, and wood preservatives. Construction staging, and equipment and materials storage, including storing possible contaminants, and equipment maintenance in the project area would occur in two areas specified by the Bureau of Reclamation. There is limited level cleared space next to the dam and contractor laydown space is limited in this area. The first contractor use area is proposed to be located adjacent to the Dixie borrow pit and is proposed to be an appropriate location for office trailers, employee parking, borrow development, refueling, and other staging activities. The second location is along the left abutment of the dam facility. This location is proposed for its moderate grades and relatively low density of vegetation. This staging area may be suitable for stockpiling, water tanks, reinforcing and formwork laydown areas, and other staging activities. Both locations are estimated to require clearing, grubbing and some level of grading.

Aggregate extraction could also require operating heavy equipment. As discussed in Section 2, borrow areas are proposed to be located along tributary drainages of the South Fork Boise River along the north side of the existing HD 121. Excavation and extraction of aggregate from these sources would require using construction equipment, which would involve using various hazardous materials such as fuel, oils, grease, and other petroleum products. These

contaminants have the potential be introduced into water systems if released or spilled, either directly or through surface runoff.

Bridge demolition or modification, as well as the demolition of other structures and facilities that would be inundated, could require handling hazardous waste including asbestos, lead paint, and wood preservatives. The risk of accidental release of hazardous or toxic materials poses a potential direct impact during construction. However, as part of Alternative B, Reclamation would manage hazardous materials and wastes from construction implementing planned best management practices (BMPs) such as those included in the Environmental Commitments section of the EIS (Section 3.28). BMPs related to hazardous materials, as described in Environmental Commitments Section 3.28 under Public Health and Safety, Hazardous Materials, and Waste section would be further defined in final design and outlined as Reclamation contracting requirements. All contracts or agreements for work on Reclamation facilities would incorporate provisions for compliance Reclamation's safety and health standards. Implementation of these standards, minimization measures and BMPs would reduce the potential release or disturbance of hazardous materials due to construction activities, therefore, no significant impacts are identified.

Effects Due to Inundation

There is the potential for infrastructure inundation due to the dam raise. These include septic systems, electrical transformers, utility poles, and one potential UST. Each of these types of infrastructure may contain hazardous or toxic materials, which could be released into the environment if the infrastructure were to be inundated. Septic systems, which contain human waste, could release bacteria into groundwater if the water table were to inundate the system. Power utility infrastructure may contain chemicals such as metals or preservatives that pose a risk to human health. A release could occur if buried infrastructure became inundated by the rising water table. A UST that contains gasoline could potentially release petroleum hydrocarbons due to inundation of the tank.

The exact locations of existing septic systems and power utility infrastructure would be identified in final design. The design of Alternative B includes an in-depth study of the locations of existing septic systems and power utility infrastructure. Any existing infrastructure that is determined to be negatively impacted by the new full pool elevation would be removed or replaced as part of Alternative B. Removing and replacing infrastructure removes the potential safety hazards due to inundation.

A preliminary review of the location of the existing UST at Fall Creek Marina indicates that the new full pool elevation for Alternative B would place the UST below the increased seasonal high groundwater elevation. Removal and decommissioning of the tank would be addressed during final design. For more information on Fall Creek Marina, see the Recreation Specialist Report in Appendix B of the EIS.

Because potential effects from inundation of infrastructure are addressed in the design of Alternative B, the effects from these factors are not significant, and no further mitigation is required than removing, replacing, or abandoning impacted infrastructure.

Best Management Practices

Multiple opportunities exist for accidents involving hazardous materials and waste during construction of Alternative B. The following BMPs would be implemented during construction to reduce potential for release of hazardous materials and waste during construction activities.

Reclamation would include information regarding the hazardous materials used for project implementation and hazardous waste that would be generated in the spill prevention, control, and countermeasure (SPCC) plan, which would control and prevent the possibility of releases of potential hazardous materials.

Project workers who may come into contact with hazardous materials or waste would be required to receive hazardous material safety training, which identifies hazardous materials on the project site and informs workers of the relevant safety procedures, rules, and regulations. The SPCC plan would include safety data sheets (SDSs) for any chemicals used in construction. Site workers would be made aware of the locations of the SDSs.

Reclamation would ensure that project construction sites have staging areas that minimize potentially hazardous waste releases and that meet BMPS for short-term construction site hazardous material storage. Equipment refueling and maintenance would not occur within 100 feet of water bodies wherever possible. Fuel storage areas would be planned to contain the volume of the largest fuel storage tank present in the containment area in the case of a possible release or leak.

Where borrow pits are near water bodies, Reclamation would ensure that BMPs for stormwater control and pollution prevention are implemented. Reclamation would maintain equipment used in these borrow pits to ensure they are free from leaks. Fuels, oils, lubricants, or solvents for equipment would not be stored in these or near the borrow pits which are located near surface water features.

The SPCC plan would also address the disposal of waste and hazardous waste generated by construction activities such as asbestos, lead paint, and wood preservatives. This hazardous waste, along with any additional forms of waste materials generated by project construction, would be removed to an approved landfill for disposal per permit requirements. Transport of hazardous materials would be conducted in accordance with 40 Code of Federal Regulations 263, Standards Applicable to Transporters of Hazardous Waste and IDAPA 58.01.05.

3.2.3 Alternative C – Anderson Ranch Dam Three-Foot Raise

Effects Due to Construction Activities

Project construction and operation activities are similar to Alternative B and therefore the risk of accidental release of hazardous or toxic materials poses a potential direct impact during construction of Alternative C. However, as part of Alternative C, BMPs related to hazardous materials, as described in Environmental Commitments Section 3.28 under Public Health and Safety, Hazardous Materials, and Waste section would be further defined in final

design and outlined as Reclamation contracting requirements. All contracts or agreements for work on Reclamation facilities would incorporate provisions for compliance Reclamation's safety and health standards. Implementation of these standards, minimization measures and BMPs would reduce the potential release or disturbance of hazardous materials due to construction activities, therefore, no significant impacts are identified.

Effects Due to Inundation

While inundation is less for Alternative C, all infrastructure inundation effects remain the same as identified for Alternative B. The exact locations of existing septic systems and power utility infrastructure would be identified during final design. Final design of Alternative C would include an in-depth study of the locations of existing septic systems and power utility infrastructure. Any existing infrastructure that is determined to be negatively impacted by the new full pool elevation would be removed or replaced as part of Alternative C. Removing and replacing infrastructure removes the potential safety hazards due to inundation.

As discussed under Alternative B, Fall Creek Marina impacts would be addressed in final design. Because potential effects from inundation of infrastructure are addressed in the design of Alternative C, the effects from these factors are not significant, and no further mitigation is required than removing, replacing, or abandoning impacted infrastructure.

Best Management Practices

Implementation of BMPs is identical to that described for Alternative B.

3.2.4 Cumulative Impacts

Cumulative effects are analyzed for the Alternative B and Alternative C. Cumulative effects are those that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. The cumulative effects analysis considers projects, programs, and policies that are not speculative and are based on known or reasonably foreseeable long-range plans, regulations, operating agreements, or other information that establishes them as reasonably foreseeable. While no present actions are identified, Reclamation has identified two past actions: Pine Bridge replacement and the 4-foot Anderson Ranch Dam crest raise for security enhancement. Reclamation has also identified two potential future projects to be considered for the cumulative impact analysis: Cat Creek Energy Project and South Fork Boise River Diversion Project. Additional project proposal information for these, as known by Reclamation to date, is provided in Chapter 2 of the EIS.

The proposed 2025 dam construction date is well removed in time from the 2018 installation of the newly replaced Pine Bridge and the 2010 construction of the security berm along the dam crest, and any releases of hazardous materials that may have occurred with those projects. Any potential impacts from the release of hazardous materials associated with the proposed Alternatives would not be additive; therefore, no cumulative impacts from hazardous materials are identified for these past actions.

Implementation of Alternative B or Alternative C is not expected to cause a release of hazardous materials, substances or waste in excess of local, state, or Federal regulations so it is not expected to contribute to cumulative impacts in conjunction with implementation of other projects. The risk of accidental release poses a potential direct impact during construction of any project, including the CCE and South Fork Boise River Diversion projects; however, USFS, Reclamation and Federal Energy Regulatory Commission (FERC) would be included as part of each project's environmental and permitting process and all projects would have to comply with similar, if not the same, standards, minimization measures and BMPs outlined for the action alternatives. Any cumulative impacts from hazardous materials, although not expected, would be dependent on activities developed for construction and operations of the Cat Creek Energy Project and the South Fork Boise River Diversion Project.

3.2.5 Mitigation

Because potential effects from inundation of infrastructure are addressed in the design of Alternative B and Alternative C, the effects from these factors would not be significant as they are eliminated by removal, replacement, or abandonment. No significant impacts to hazardous materials and waste are identified and therefore no mitigation is required.

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