

# **Abbreviated Preliminary Assessment for Bennett Lumber Company**

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Idaho County



**State of Idaho  
Department of Environmental Quality**

**February 2014**



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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C. L. "Butch" Otter, Governor  
Curt Fransen, Director

March 4, 2014

Mr. Ken Marcy  
U.S. Environmental Protection Agency  
Region 10  
12928 SW 276<sup>th</sup> Street  
Vashon, WA 98070

Subject: Abbreviated Preliminary Assessment Report for the Bennett Lumber Site,  
Idaho County, Idaho

Dear Mr. Marcy:

The Idaho Department of Environmental Quality (DEQ) completed the enclosed Abbreviated Preliminary Assessment (APA) for the Bennett Lumber site under a cooperative agreement with Region 10 of the United States Environmental Protection Agency (EPA). Under this cooperative agreement, DEQ provides technical support for completion of preliminary assessments.

The Bennett Lumber site is owned by Bennett Forest Industries. This assessment was conducted with the permission of Kevin Tomlinson of Black Swan Property Management. DEQ inspected the site on July 25, 2013. At the time of the site visit, no evidence for sources or potential releases due to historic timber industry practices were present at the site. All historic industrial related disturbances are well vegetated. Potential risks to human or ecological receptors associated with this site are negligible.

As a result of DEQ's research and observations, a No Remedial Action Planned (NRAP) designation is recommended for the Bennett Lumber site. This APA report can also be found on DEQ's Preliminary Assessment web page: <http://www.deq.idaho.gov/preliminary-assessments>.

If you have any questions, please feel free to call me at (208) 373-0296 or email [dana.swift@deq.idaho.gov](mailto:dana.swift@deq.idaho.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dana Swift".

Dana Swift  
Mine Waste Project Coordinator

Attachments

cc: Kevin Tomlinson, Black Swan Property Management  
Dennis Behler, Idaho DEQ Lewiston Regional Office

## **Acknowledgments**

DEQ would like to thank Kevin Tomlinson of Black Swan Property Management for permitting access to the site.

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## Introduction

This abbreviated preliminary assessment (APA) for the Bennett Lumber site near Elk City, Idaho provides the rationale for the No Remedial Action Planned (NRAP) determination that no additional assessments or site investigations are necessary at this time. Section 1 provides the APA checklist (modified from EPA, 1999) filled out by the assessor to determine that an APA was warranted. The following sections contain additional relevant information and evidence to support the APA, including historical and geologic information (Section 2), site conditions and photographs (Section 3), maps and potential receptors (Section 4), and references (Section 5).

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**Site Inspector:** Dennis Behler, DEQ Lewiston Regional Office

**Site Name:** Bennett Lumber

**Previous Names (aka):** Shearer Lumber

**Site Owner:** Bennett Forest Industries

**Address:** P.O. Box 130  
Princeton, ID 83857

**Site Location:** The Bennett Lumber site is located near the American River approximately 1.5 miles southwest of Elk City, Idaho on Rivers Edge road south of State Highway 14.  
Township 29 North, Range 8 West, Section 27

**Latitude:** 45.815864°N **Longitude:** -115.456893°W

### Description of release (or potential release) and its probable nature:

The Department of Environmental Quality (DEQ) Lewiston Regional Office identified the former Bennett Lumber site as a regional priority industrial site due to its former use as a timber saw mill industry site, close proximity to the American River and planned residential development. The site was investigated by the DEQ on July 25, 2013 for evidence of chemical or petroleum contamination and potential releases to the airborne, surface water, or ground water pathways from historic industry practices. At the time of the site visit, no hazardous or deleterious materials or products were evident at the site.

## Section 1. APA Checklist

### Task 1—Superfund Eligibility Evaluation

Assessor, if all answers are “no,” continue to task 2; otherwise, explain any “yes” answers below and then skip to task 3.

	YES	NO
1. Is the site currently in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) or an “alias” of another site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Is the site being addressed by some other remediation program (i.e., federal, state, or tribal)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Are the hazardous substances that may be released from the site regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the Nuclear Regulatory Commission, Uranium Mill Tailings Radiation Control Act, or Occupational Safety and Health Administration)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Are the hazardous substances that may be released from the site excluded by policy considerations (i.e., deferred to Resource Conservation and Recovery Act corrective action)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Is there sufficient documentation to demonstrate that there is no potential for a release that constitutes risk to human or ecological receptors (e.g., comprehensive remedial investigation equivalent data showing no release above applicable or relevant and appropriate requirements (ARARs), completed removal action, documentation showing that no hazardous substance releases have occurred, or an EPA-approved risk assessment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Assessor, please explain all “yes” answer(s):

**Regarding question 5:** A reconnaissance level preliminary assessment was conducted to determine if any potential sources or associated releases could be identified due to historical timber industry practices. No concerns were identified during desktop research. Observations during the site inspection include:

- Hazardous or deleterious materials were not present at the site.
- No evidence for chemical or petroleum contamination releases or potential releases that would impact the airborne, surface water or ground water pathways.
- The site is well vegetated and appears healthy.
- Residential development is planned for this site. At the time of the site visit, one unoccupied residence was located on site.

## Task 2—Initial Site Evaluation

If information is not available to make a “yes” or “no” response below, further investigation may be needed. In these cases, the assessor should determine whether an APA is appropriate.

**If the answer is “no” to any of questions 1, 2, or 3, proceed directly to task 3.**

	YES	NO
1. Does the site have a release or a potential to release?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Does the site have uncontained sources containing CERCLA-eligible substances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Does the site have documented on-site, adjacent, or nearby targets?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**If the answers to questions 1, 2, and 3 above were all “yes,” then answer questions 4–7 before proceeding to task 3.**

	YES	NO
4. Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?	<input type="checkbox"/>	<input type="checkbox"/>
5. Is there an apparent release at the site with no documentation of exposed targets, but targets are on site or immediately adjacent to the site?	<input type="checkbox"/>	<input type="checkbox"/>
6. Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but targets are nearby (e.g., within 1 mile)?	<input type="checkbox"/>	<input type="checkbox"/>
7. Are there uncontained sources containing CERCLA hazardous substances, a potential to release with targets present on site or in proximity to the site, but no indication of a hazardous substance release?	<input type="checkbox"/>	<input type="checkbox"/>

### Notes:

No hazardous or deleterious materials or products were evident during the site visit; therefore, there are no identified releases or potentials for release. Potential risks to human or ecological receptors are negligible.

Table I parallels the questions above and should be used by the assessor to make decisions during task 3. Table I identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. The assessor should use Table I in determining the need for further action at the site, based on the answers to the questions in task 2. Assessors should use professional judgment when evaluating a site. An assessor’s individual judgment may be different from the general recommendations for a site given below.



releases of hazardous or deleterious materials by airborne, surface water, or ground water pathways. The site is located approximately 1.5 miles southwest of Elk City; the closest occupied dwelling. The closest downstream residence is approximately 2.5 miles from the site. Additional information supporting this designation is included in the following sections.

## Section 2. Historical and Geologic Information

Desktop research was conducted prior to visiting the site. DEQ cannot improve or expand upon these reports; therefore, the information is included as direct quotations.

**History:** The history of the area surrounding the Bennett Lumber site included mining and the timber industry, as briefly summarized below from *Pioneer Days in Idaho County – Volume 1* (Elsensohn, 1965):

The first settlement in the new county [Idaho County] was by gold seekers from Pierce, Idaho, who in 1861 followed the Nez Perce Trail into Elk City Basin, hopeful of finding gravel deposits that would contain gold. The hopes of miners were realized and Elk City became the pioneer settlement of the upper Clearwater County. No town existed until the following year when a local government was established....

Mining activities had slowed down before World War II and the war saw the close of the remaining operations. In years since, several have tried to reopen, but most of today's mining is done with the use of small suction-type dredges that one sees operating along streams....

The timber industry developed as an economic asset to the County. In the 1940's this industry began to develop on a full scale. While sawmills, mostly privately owned, were built earlier to produce lumber chiefly for home building, it was the huge demand for timber after World War II that made timber production a leading industry. Potlatch Forest Inc. began cutting on the first major site on the Forest in 1944 in the Meadow Creek-Cougar Creek area. Within two years 75 million board feet had been taken out of the area.

While mining as an economic asset to the county was short lived, it gave the county its economic beginning and contributed sporadically to the economy throughout its developing years. Forestry and the timber industry, farming and ranching remain the lifeblood of the county, invigorated in recent years by the growth of tourism as a lucrative industry.

**Geologic Features:** The following is the description of the Elk City, Idaho area from the technical report *Preliminary Geologic Map of the Red River Hot Springs-Elk City Area, Idaho County, Idaho* (Burmester, et al 1990). The figure referenced in this quote has not been duplicated in this report.

The most recent references showing the geology of the Elk City area are Mitchell (1996), Stanford (1996), Lewis and others (1990, 1993), and Mitchell and Bennett (1979). The geology and ore deposits of the area are discussed in Bennett and others (1999), Shenon and Reed (1934), Lorain (1938), Thomson and Ballard (1924), Jellum (1909), Rains (1991), and unpublished reports on individual deposits. Bennett (1980) discussed the geochemistry of sediments derived from Idaho batholith rocks similar to those that underlie much of the study area. A brief description of the geologic framework of the area follows.

Most of the ore deposits in the Elk City and surrounding areas formed within 1,500 feet of the subhorizontal contact between the Idaho batholith and the overlying Proterozoic metamorphic rocks (Figure 2.2-1). These metamorphic rocks have been separated into the Syringa and Elk City metamorphic sequences. The Syringa metamorphic sequence consists of coarse-grained quartz-mica schist, quartzite, and calc-silicate rocks that are interbedded on a scale of decimeters. The Elk City metamorphic sequence consists of

fine- to medium-grained quartz-feldspar-biotite gneiss, thinly layered biotite quartzite, and quartz-muscovite-biotite schist (Mitchell, 1996; Bennett and others, 1999). The granitic rocks in the Elk City area are mostly biotite granodiorite (Stanford, 1996; Mitchell, 1996), which forms the bulk of the Atlanta lobe of the batholith (Lewis and others, 1987). Both the Idaho batholith and the Precambrian metamorphic rocks are intruded by northeast-trending Tertiary dikes (Rains, 1991; Mitchell, 1996; Stanford, 1996). The most prevalent ore deposits in the area are gold-silver veins, with or without base metals. These veins are probably related to the intrusion of the Idaho batholith (Snee and Lund, 1984; Lund and Esparza, 1990).

A series of major northeast-trending faults and shear zones cross the area, including the Blanco Creek shear zone (Lewis and others, 1990, 1993; Bennett and others, 1999). These faults intersect a set of northerly trending faults, including the Orogrande shear zone, that control much of the gold mineralization (Bennett and others, 1999; Rains, 1991; Stanford, 1996).

### **Section 3. Site Conditions and Photographs**

Bennett Lumber site observations and photographs were collected during the DEQ site inspection on July 25, 2013. The site was found to be well vegetated with small lodge pole pine trees and an unoccupied residence (Photos 1 and 2). All former evidence of the lumber company operations has been removed.



**Photo 1. Location of the former Bennett Lumber operations.**



**Photo 2. Unoccupied residence on the site of the former Bennett Lumber operations.**

## Section 4. Maps and Potential Receptors

The Bennett Lumber site is located southwest of Elk City, Idaho. Figure 1 is a topographic map of the location and Figure 2 shows the aerial view of the location. Specific site location details are included in the above checklist. The generalized geology of this area is shown in Figure 3 with a description included in Section 2 of this report.

Since desktop research and site inspection observations for the Bennett Lumber site indicate that there are no current releases of hazardous or deleterious materials, the maps included in this section provide supporting information to demonstrate that risks to human or ecological receptors from any release are minimal.

The Bennett Lumber site is located on the east bank of the American River within the South Fork Clearwater subbasin. The 15-mile target distance limit (TDL) follows the American River and ends on the South Fork of the Clearwater River (Figure 4). Potential ground water pathways include four public drinking water systems and approximately 110 domestic wells located within the 4-mile radius of the site (Figure 4). There are numerous wetlands within the 2-mile radius of the site (Figure 5).

Sensitive species can have large habitat ranges that overlap the vicinity of the Bennett Lumber site. Based on the list of *Endangered, Threatened, Proposed, and Candidate Species with Associated Proposed and Critical Habitats in Idaho* (USFWS 2013), the following species are identified for Idaho County:

- Mammals: Canada Lynx, *Lynx canadensis*, threatened species and North American Wolverine, *Gulo gulo luscus*, proposed species.
- Fish: Bull Trout, *Salvelinus confluentus*, threatened species-designated critical habitat.
- Plants: MacFarlane's Four-O'Clock, *Mirabilis macfarlanei*, threatened species; Spalding's Catchfly, *Silene spaldingii*, threatened species; and Whitebark Pine, *Pinus albicaulis*, candidate species.

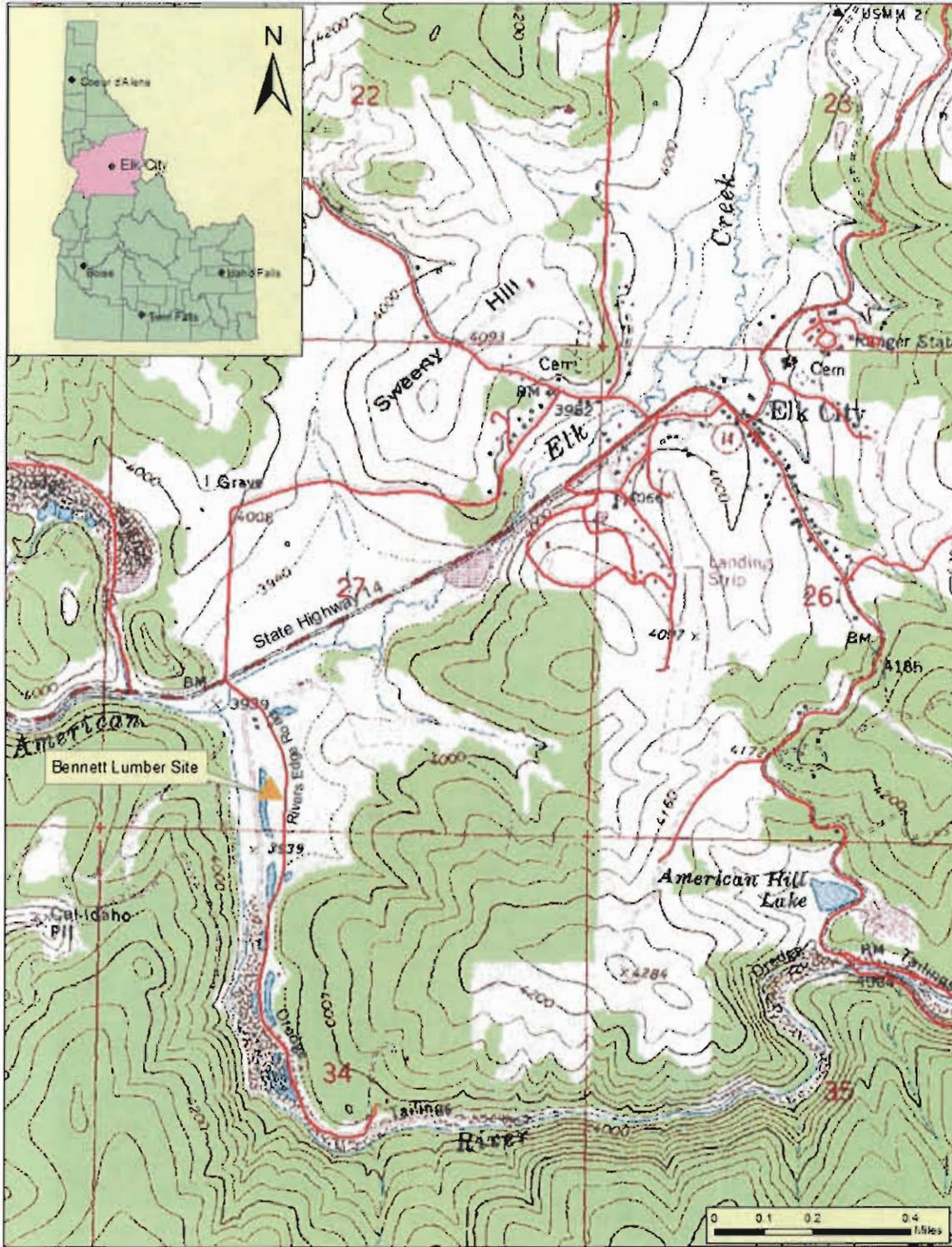


Figure 1. Location of the Bennett Lumber site in Idaho County, Idaho.

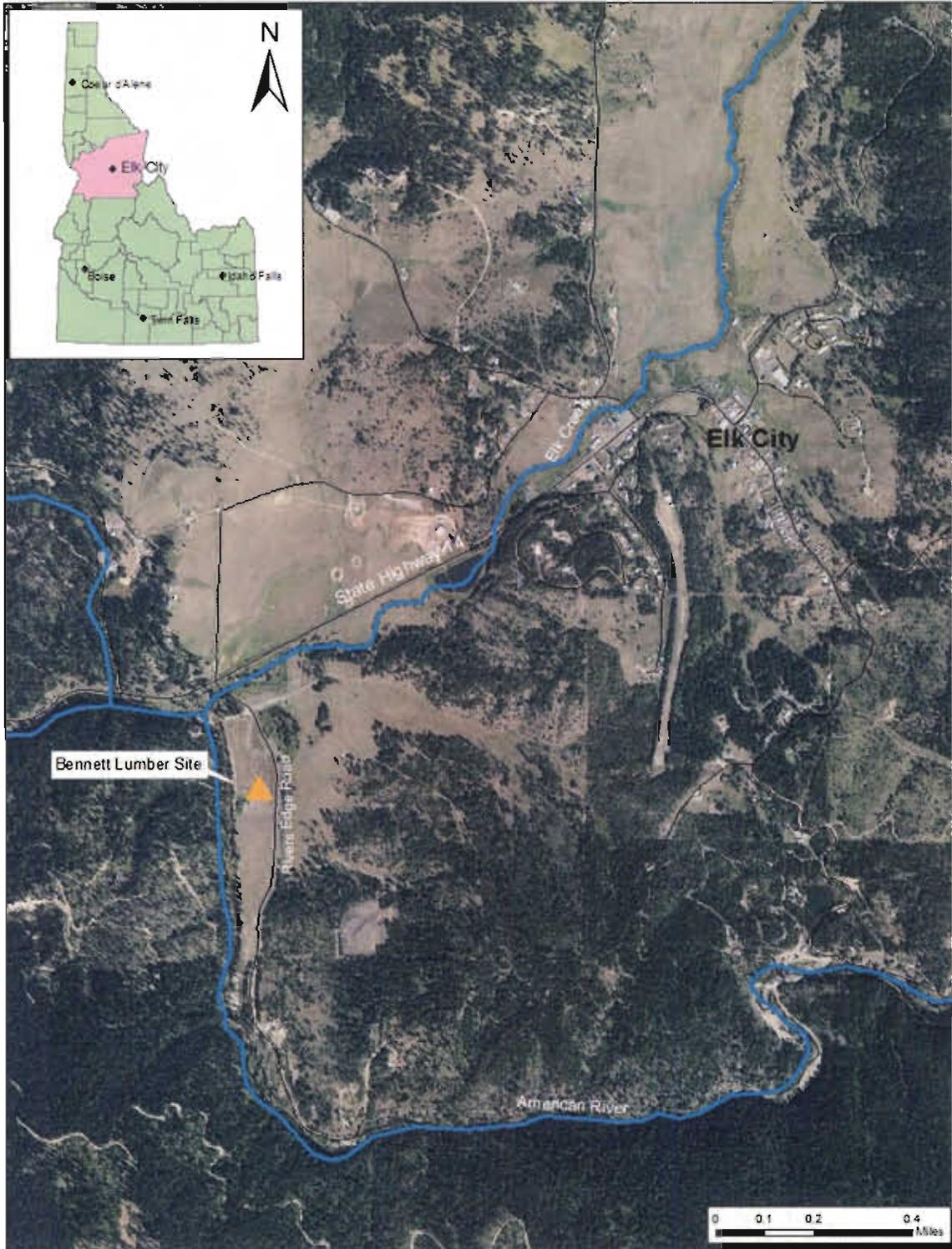


Figure 2. Aerial view of the Bennett Lumber site in Idaho County, Idaho.



Figure 3. Map of major lithology in the vicinity of the Bennett Lumber site in Idaho County, Idaho.

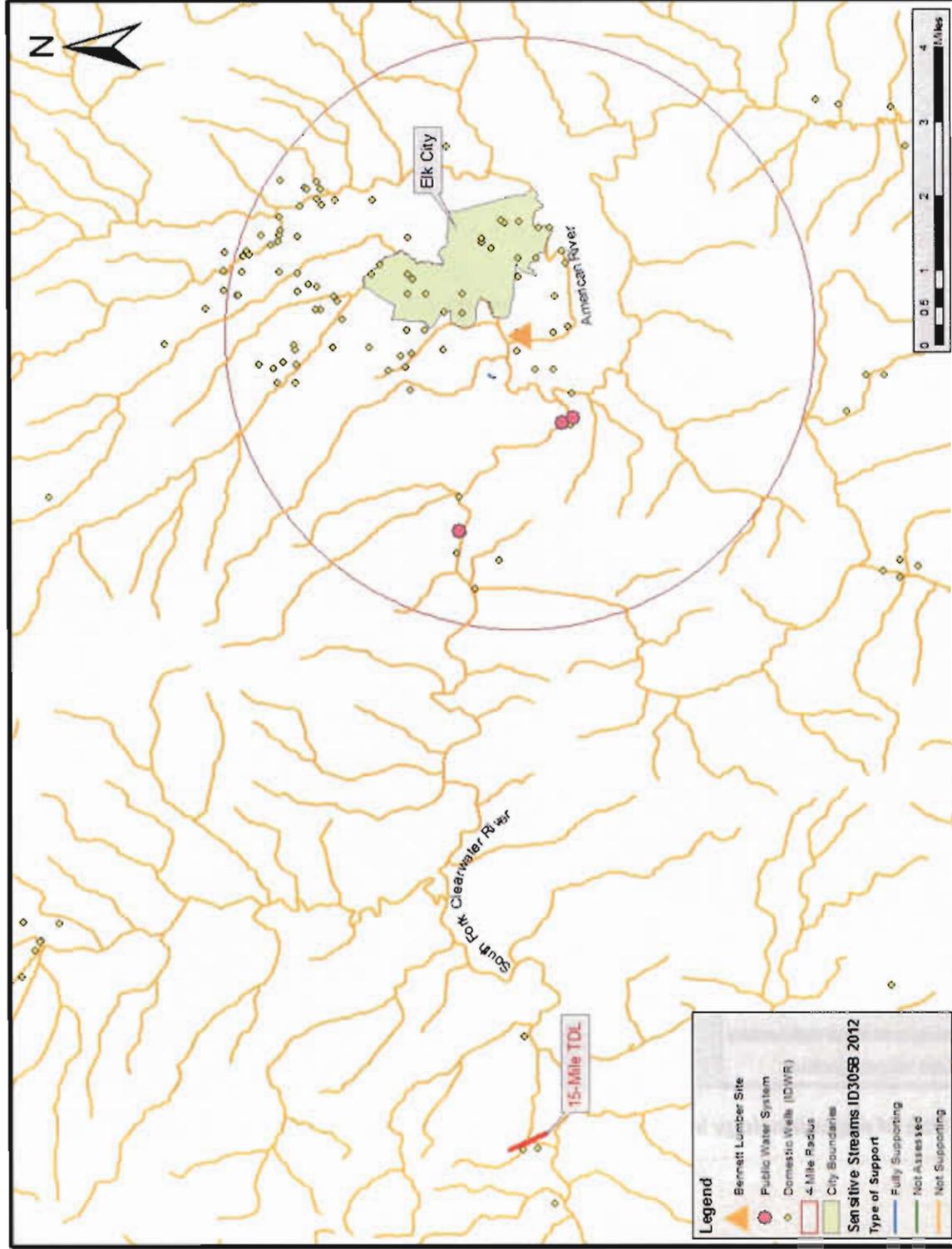


Figure 4. Domestic well and public water system locations.

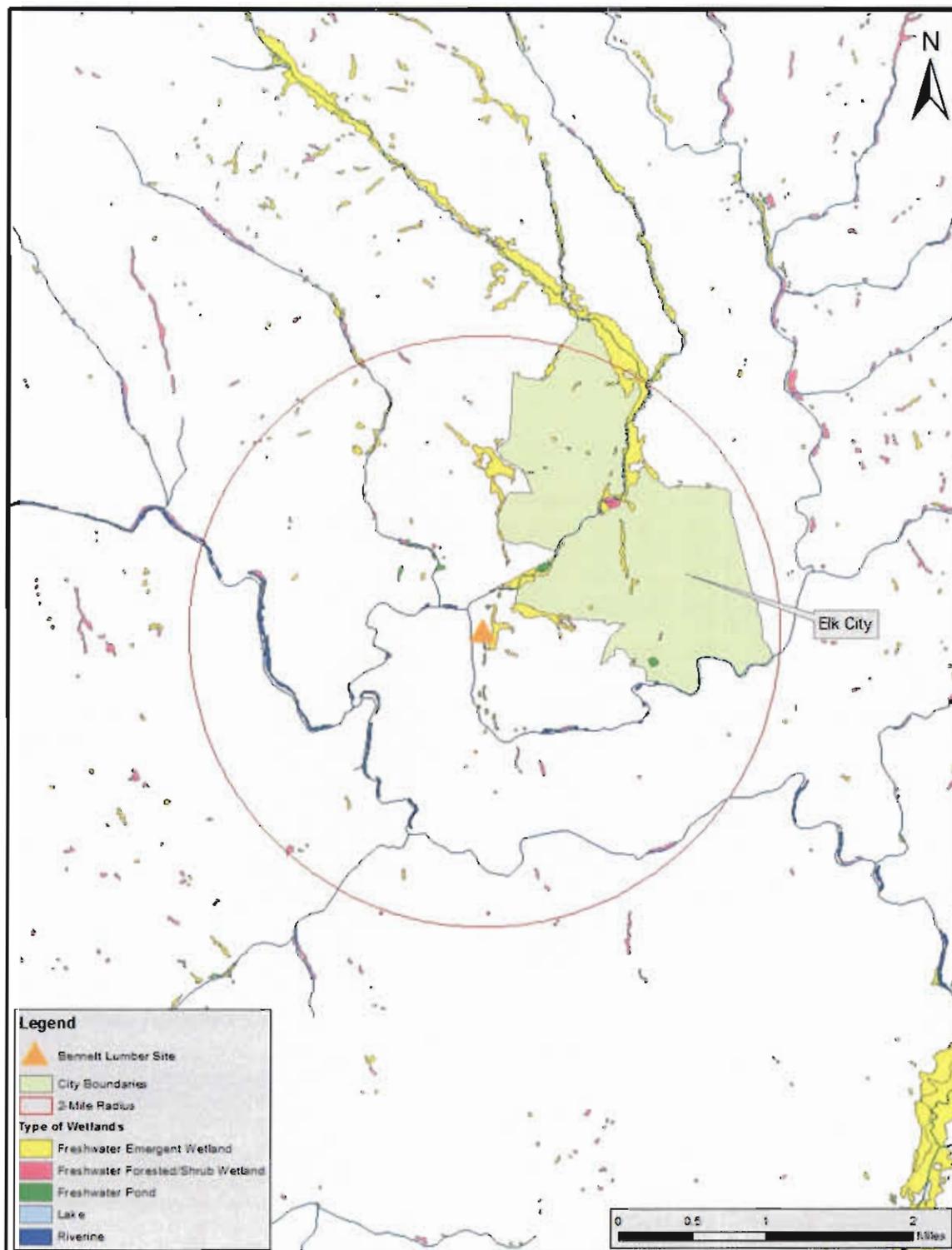


Figure 5. Wetland locations.

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## Section 5. References

- Burmester, R.F., J. Dragovich, and R.S. Lewis. 1990. *Preliminary Geologic Map of the Red River Hot Springs-Elk City Area, Idaho County, Idaho*. Moscow, ID: Idaho Geological Survey. Technical Report 90-03.
- Elsensohn, Sister M. Alfreda. 1965. *Pioneer Days in Idaho County – Volume I*. Caxton/Idaho Corporation of Benedictine Sisters.
- EPA (U.S. Environmental Protection Agency). 1999. *Improving Site Assessment: Abbreviated Preliminary Assessments*. Quick Reference Guidance Series. Office of Emergency and Remedial Response Site Assessment Team. EPA-540-F-98-037. OSWER 9375.2-09FS. PB98-963308.
- USFWS (United States Fish and Wildlife Service). 2013. “Endangered, Threatened, Proposed, and Candidates Species with Associated Proposed and Critical Habitats in Idaho.” USFWS – Idaho Fish and Wildlife Office. Species list was revised by the USFWS on 10/23/2013 and is valid for 90 days after 02/24/2014.

## GIS Coverages

- IDWR (Idaho Department of Water Resources). Domestic Wells (deqgis83.DBO.Domestic\_Wells). Using: ArcMap GIS. Version 10. Redlands, CA: Environmental Systems Research Institute, Inc., 1992–1999.
- Major Lithology (deqgis83.DBO.Major\_Lithology). Using: ArcMap GIS. Version 10. Redlands, CA: Environmental Systems Research Institute, Inc., 1992–1999.
- NAIP (National Agricultural Imagery Program). 2013. Using: ArcMap GIS. Version 10. Redlands, CA: Environmental Systems Research Institute, Inc., 1992-1999.
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- USFWS (US Fish and Wildlife Service). 2012. National Wetlands Inventory. Available at: <http://www.fws.gov/wetlands/index.html>
- USGS (US Geological Survey). 24K Quad Map. Using: ArcMap GIS. Version 10. Redlands, CA: Environmental Systems Research Institute, Inc., 1992-1999.

