Abbreviated Preliminary Assessment for Craigmont Landfill

Lewis County

State of Idaho
Department of Environmental Quality
November 2012
November 29, 2012

Mr. Ken Marcy  
U.S. Environmental Protection Agency  
12928 SW 276th Street  
Vashon, WA 98070

Subject: Abbreviated Preliminary Assessment Report for the Craigmont Landfill, Lewis County, Idaho

Dear Mr. Marcy:

The Craigmont Landfill is located on private property. The Idaho Department of Environmental Quality (DEQ) requested access to the private property, and received permission from Mr. Robert Flynn. Mr. Flynn will receive a copy of this report.

Attached are two copies of DEQ’s Abbreviated Preliminary Assessment report for the Craigmont Landfill. As discussed in the report, toxicological risks to human and ecological receptors are unlikely at the site. This is due to the lack of residences or structures, no site workers present, and limited use of this area by the public.

The air, soil, and water pathways are not complete. All historic landfill related disturbances are well vegetated and stable. Although no evidence existed of any recent disturbances or activity, the site is accessible. U.S. Highway 95 parallels the site and can be observed from the road.

No drinking water sources, wells, or ground water sources exist on the site.

Based on existing conditions and uses, historic information, observations made during the site visit, and visual analysis; potential pathways of contaminants to receptors and potential exposures to ecological and human receptors do not exist. **DEQ recommends the determination of the Craigmont Landfill as No Remedial Action Planned (NRAP).**
A link to the Abbreviated Preliminary Assessment for the site can also be found on DEQ’s Preliminary Assessment Web page at:


If you have any questions about this site, the report, or DEQ’s recommendations, please do not hesitate to call me at (208) 373-0563.

Respectfully,

Tina Elayer
Mine Waste Specialist

attachments

cc: Robert Flynn
    Craigmont Landfill PA File
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Introduction

This is an abbreviated preliminary assessment (APA) for the Craigmont Landfill near Craigmont, Idaho. This document provides the rationale for the No Remedial Action Planned (NRAP) determination and that no additional analysis or site investigation is necessary for the Craigmont Landfill. Section 1 provides the APA checklist filled out by the assessor to determine that an APA was warranted and that no further action is required from the Idaho Department of Environmental Quality (DEQ). The following sections contain additional relevant information and evidence to support the APA, including historical and geologic information (Section 2), photographs (Section 3), maps (Section 4), and references generated during the site visit or desktop research (Section 5).

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Date: 10/9/2012

Site Name: Craigmont Landfill

Previous Names (aka): N/A

Site Owner: Robert Flynn

Address: Fisher Road  
Craigmont, ID  83523

Site Location: The Craigmont Landfill is located 1-3/4 miles southeast of Craigmont along Highway 95.  
Township 33 North, Range 2 West, Section 3

Latitude: 46.22796°N  
Longitude: -116.44216°W

Description of release (or potential release) and its probable nature:
The Craigmont Landfill was investigated by DEQ on October 9, 2012, for potential releases of heavy metals by airborne, surface water, or ground water pathways. Additionally, DEQ investigated potential discharges of other deleterious materials, such as petroleum products and processing chemicals. No deleterious materials, petroleum products, or processing chemicals 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.

1. Is the site currently in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) or an “alias” of another site? ☒
2. Is the site being addressed by some other remediation program (i.e., federal, state, or tribal)? ☒
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)? ☒
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)? ☒
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)? ☒

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

Regarding question 5: A site inspection involving direct observations confirmed that contaminants of concern, including hazardous materials and petroleum products, do not exist in concentrations that present a threat to human health or the environment. No contaminants or hazardous substances remain on the 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.

1. Does the site have a release or a potential to release? ☒
2. Does the site have uncontained sources containing CERCLA-eligible substances? ☒
3. Does the site have documented on-site, adjacent, or nearby targets? ☒
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?  | ☐ | ☐
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? | ☐ | ☐
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)? | ☐ | ☐
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? | ☐ | ☐

Notes:
The Craigmont Landfill was assessed because the Lewis County Commissioners voiced concerns to the DEQ Lewiston Regional Office that these types of old sites could be contaminating ground and surface water possibly causing public health concerns which in turn could cost the county money. No hazardous materials were evident during the site visit.

During the site assessment, DEQ used references from several different documents, including United States Geological Survey (USGS) maps, county tax rolls, and historical reports. These documents often have different spellings for town sites, and/or geographic features. DEQ has retained the spelling from the original source document.

Table 1 parallels the questions above and should be used by the assessor to make decisions during task 3. Table 1 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 1 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.
Table 1. Site assessment decision guidelines for a site.

<table>
<thead>
<tr>
<th>Suspected/Documented Site Conditions</th>
<th>EPA-Recommended Site Assessment Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. There are no releases or potential to release.</td>
<td>APA</td>
</tr>
<tr>
<td>2. No uncontained sources with CERCLA-eligible substances are present on site.</td>
<td>APA</td>
</tr>
<tr>
<td>3. There are no on-site, adjacent, or nearby targets.</td>
<td>APA</td>
</tr>
<tr>
<td>4. There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site.</td>
<td>APA → SI or PA/SI</td>
</tr>
<tr>
<td>5. There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site.</td>
<td>APA → SI or PA/SI</td>
</tr>
<tr>
<td>6. There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site.</td>
<td>Full PA</td>
</tr>
<tr>
<td>7. There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.</td>
<td>Full PA</td>
</tr>
</tbody>
</table>

Task 3—DEQ Site Assessment Decision

When completing task 3, the assessor should use task 2 and Table 1 to select the appropriate decision. For example, if the answer to question 1 in task 2 was “no,” then an APA is appropriate and the “NRAP” box below should be checked. Additionally, if the answer to question 4 in task 2 is “yes,” then two options are available (as indicated in Table 1): (1) proceed with an APA and check the “Lower Priority SI” or “Higher Priority SI” box below or (2) proceed with a combined PA/SI.

Check the box that applies based on the conclusions of the APA checklist:
- [ ] No Remedial Action Planned (NRAP)
- [ ] Defer to NRC
- [ ] Higher Priority SI
- [ ] Refer to Removal Program
- [ ] Lower Priority SI
- [ ] Site is being addressed as part of another CERCLIS site
- [ ] Defer to RCRA Subtitle C
- [ ] Other: __________________________

DEQ Reviewer:

[Signature]

Dennis Behler

[Date] 8/3/12
Please explain the rationale for your decision:
A site inspection involving direct observations confirmed that contaminants of concern, including hazardous materials and petroleum products, do not exist in concentrations that present a threat to human health or the environment. The Craigmont Landfill is not located near any occupied dwellings, towns, or inhabitants. No hazardous materials were evident during the site visit. The closest residence to the landfill is approximately one mile downstream.

As a result of DEQ’s research and observations, the department recommends an NRAP designation for the Craigmont Landfill. Sections 2 through 5 provide further support for this determination.

Section 2. Historical and Geologic Information
Numerous sources were used during desktop research prior to visiting the site. DEQ could not improve or expand upon these reports by writing additional historical or geological text, so they are directly quoted below.

Site History: Nielsen (1980) described the Craigmont area as follows:

The Village of Craigmont, located in Lewis County in the center of the Camas Prairie wheat section, is a major wheat shipping point in the state of Idaho. It is on the main Federal-State north and south highway (U.S. 95), approximately 45 miles south and east of Lewiston, Idaho. It is served by the Camas Prairie Railroad. In 1955 the population of Craigmont was about six hundred; by 1965 it had grown to around seven hundred.

This small town has an interesting history. On November 18, 1895 the Nez Perce Indian Reservation was opened for settlement; by 1898 there were 60 lots in a little town site called Chicago. The first building was a general store which changed hands several times during its first year of existence, and was eventually bought by O.W. Leggett who established the first permanent business in the new town. From 1898 to 1902 the town grew rapidly and new businesses were established. The United States Post Office often confused Chicago, Idaho with Chicago, Illinois, and mail for one was frequently sent to the other; often these mix-ups caused delay in receipt of much needed replacement parts for farm machinery required by the Idaho farmers. In 1902 or 1903 Leggett, who was a notary in Chicago, had the town renamed for his older daughter, Ilo, thus ending the confusion.

In 1904 a fire destroyed most of the town, but residents soon had it rebuilt. From 1907 to 1909 the Camas Prairie Railroad extended its tracks south from Lewiston, but the tracks were a mile from the Ilo town site. To remedy this situation the residents moved the entire town to the south side of the tracks, the present location of the town of Craigmont.

At the same time John Vollmer, a Lewiston businessman, built a townsitae named for himself on the opposite side of the tracks. Thus there were two towns, each with its own church, bank, newspaper, school, post office, business and residential districts existing side by side in complete disharmony, each town trying to out do the other.

This state of affairs continued until the two towns were finally consolidated on June 17, 1920. At the annual picnic on June 18 a mock wedding was performed and "Miss Ilo" and "Mr. Vollmer" were united and pronounced CRAIGMONT, the new town being named after Colonel William Craig, the first permanent white settler in Idaho.
The Craigmont Landfill was operated during the time described above and was closed in the mid-1970s. Common practice in those days was to burn the contents of the dump several times per year. Therefore, materials that could pose a threat to human health were more than likely destroyed by fire with mostly rusted iron and ash remaining on the site.

**Geologic Features:** The following is the description of the Craigmont Landfill area from the U.S. Geological Survey (USGS) Web page (2003):

During late Miocene and early Pliocene times, one of the largest basaltic lava floods ever to appear on the earth’s surface engulfed about 63,000 square miles of the Pacific Northwest. Over a period of perhaps 10 to 15 million years lava flow after lava flow poured out, eventually accumulating to a thickness of more than 6,000 feet. As the molten rock came to the surface, the earth’s crust gradually sank into the space left by the rising lava. The subsidence of the crust produced a large, slightly depressed lava plain now known as the Columbia Basin (Plateau). The ancient Columbia River was forced into its present course by the northwesterly advancing lava. The lava, as it flowed over the area, first filled the stream valleys, forming dams that in turn caused impoundments or lakes. In these ancient lake beds are found fossil leaf impressions, petrified wood, fossil insects, and bones of vertebrate animals.

With the end of the outpouring of lava, tremendous forces deep within the earth began to warp the plateau in several places. A general uplift of the mountainous region in the north caused the entire plateau to tilt slightly to the south. This tilting and associated stair step rock folds, called monoclines, in the vicinity of Coulee City and Soap Lake, played an important role in the formation of the Grand Coulee.

After 11 million years of flows, up to 150 separate lava flows with a combine depth of over 2 miles remain. Most recently windblown soil, called loess, from the glaciers was deposited on top of the lava flows. Massive floods which roared through central Washington washed away some of this loess. Where the loess remains, the soil is extremely fertile, proving to be excellent for growing wheat, barley, canola and many other crops which you will encounter directly south of Lake Roosevelt.

### Section 3. Site Conditions and Photographs

The Craigmont Landfill is currently a cattle pasture. Evidence of prior landfill activity includes rusted iron, an old bucket, a tin can, and a short piece of pipe. Other than the aforementioned, there is very little exposed trash. The site appears to have been covered with dirt and rock. There is a spring present approximately 75 yards up gradient from the site. Highway 95 parallels the site on the west. Evidence of healthy ground vegetation is present everywhere on the site with no signs of phytotoxicity in the soil as evidenced by bare spots associated with soil staining. No seeps were observed from the fill area. There is also a spring approximately 50 yards down gradient but little water was observed.

All of the Craigmont Landfill photographs in this section were taken by DEQ on October 9, 2012. Vegetation in the photos looks stressed because of the time of the year the photos were taken.
Photo 1 shows Craigmont Landfill (now a cattle pasture) with Highway 95 in the background. The one bare spot on site appears to be from a physical surface disturbance.

Photo 1. Craigmont Landfill.

Photo 2 is an overview of the Craigmont Landfill (currently a cattle pasture).

Photo 2. Craigmont Landfill.
Photo 3 shows some still visible rusty iron from the landfill.

![Photo 3. Rusty iron from the Craigmont Landfill.](image)

Photo 4 shows another view of the Craigmont Landfill.

![Photo 4. Craigmont Landfill.](image)
Photo 5 shows a spring 75 yards up gradient of the Craigmont Landfill.

Photo 5. Spring 75 yards up gradient of Craigmont Landfill.

Photo 6 shows a seasonal stream that flows between Highway 95 and Craigmont Landfill. Most of the water comes from the wastewater treatment lagoons.

Photo 6. Seasonal stream between Highway 95 and Craigmont Landfill.
Section 4. Maps

Figure 1. Location of the Craigmont Landfill in Lewis County, Idaho.
(Source: USGS 100K quads)
Figure 2. Map of major lithology in the vicinity of the Craigmont Landfill.
There are approximately 23 domestic well locations and 3 public water systems within the 4-mile radius, 15-mile TDL. There are no significant wetlands within a 2-mile radius or in the general area.
(Source: Idaho GIS ArcSDE 9.3 Geodatabase, National Agricultural Imagery Program 2004)
Figure 4. Plant, nongame animal, and fishery sensitive species within 4-mile radius and surrounding area of the Craigmont Landfill.
(Source: SDE Feature Dataset, Animal Conservation Database. Idaho GIS ArcSDE 9.2 Geodatabase)
Section 5. References


GIS Coverages


IDFG (Idaho Department of Fish and Game). 2002. Fisheries information GIS layer.


