ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist can be used to help the site investigator determine if an Abbreviated Preliminary Assessment (APA) is warranted. This checklist should document the rationale for the decision on whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer: __Bruce A. Schuld, Idaho DEQ_____ ___08/06/10___
(Name/Title) (Date)
_1410 N. Hilton, Boise, ID 83706_____ _(208)373-0554
(Address) (Phone)
_bruce.schuld@deq.idaho.gov_____
(E-Mail Address)

Site Name: Never Sweat Mine

Previous Names (if any): aka Never Sweat Patent, Pittsburg-Idaho Group, Never Sweat Shaft,

Site Location: 1 mile west of Gilmore, Idaho

T 13 N R 27 E, Sec 18 , 83464
(Zip)

Latitude: N 44.45710° **Longitude:** W 113.29070°

Describe the release (or potential release) and its probable nature:

This site was investigated for potential releases of heavy metals and sediment from mine waste dumps, and potential discharges of other deleterious materials, such as petroleum products and ore processing chemicals.

Part 1 - Superfund Eligibility Evaluation

If all answers are "no" go on to Part 2, otherwise proceed to Part 3.	**YES**	**NO**
1. Is the site currently in CERCLIS or an "alias" of another site?		**x**
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?		**x**
3. Are the hazardous substances potentially released at 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 NRC, UMTRCA, or OSHA)?		**x**
4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?		**x**
5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, or an EPA approved risk assessment completed)?	**x**	

Please explain all "yes" answer(s). Historical records research and site visit confirmed that contaminants of concern do not exist in concentrations or volumes that present a threat to human

health or the environment.

Part 2 - Initial Site Evaluation
For Part 2, if information is not available to make a "yes" or "no" response, further investigation may be needed. In these cases, determine whether an APA is appropriate. Exhibit 1 parallels the questions in Part 2. Use Exhibit 1 to make decisions in Part 3.

If the answer is "no" to any of questions 1, 2, or 3, proceed directly to Part 3.	**YES**	**NO**
1. Does the site have a release or a potential to release?	**X**	
2. Does the site have uncontained sources containing CERCLA eligible substances?	**X**	
3. Does the site have documented on-site, adjacent, or nearby targets?	**X**	

If the answers to questions 1, 2, and 3 above were all "yes" then answer the questions below before proceeding to Part 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?		**X**
5. Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site?		**X**
6. Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)?		**X**
7. Is there 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?		**X**

Notes:

Recreational home sites are located within the subject area, and ORV recreationists visit this site. However, because it is remote and exposure times limited there are very low potential risks to human health or the environment. Large scale mining activities occurred in this area and no waste dumps, adits, or discharges were observed. **(See attached Gilmore Mine Area Photo log and Site Conditions)**

EXHIBIT 1 SITE ASSESSMENT DECISION GUIDELINES FOR A SITE

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgement when evaluating a site. Your judgement may be different from the general recommendations for a site given below.

Suspected/Documented Site Conditions		APA	Full PA	PA/SI	SI
1. There are no releases or potential to release.		**Yes**			
2. No uncontained sources with CERCLA-eligible substances are present on site.		**No**			
3. There are no on-site, adjacent, or nearby targets.		**Yes**			
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.	Option 1: APA SI	**Yes**			
	Option 2: PA/SI	**No**			
5. There is an apparent release at the site with no documentation of targets, but there are targets on site or immediately adjacent to the site.	Option 1: APA SI	**No**			
	Option 2: PA/SI	**No**			
6. There is an apparent release and no documented on-site targets. There are 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.		**No**			
7. There is no indication of a hazardous substance release, and there are not uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.		**No**			

Part 3 - EPA Site Assessment Decision

When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was “no,” then an APA may be performed and the “NFRAP” box below should be checked. Additionally, if the answer to question 4 in Part 2 is “yes,” then you have two options (as indicated in Exhibit 1): Option 1 --conduct an APA and check the “Lower Priority SI” or “Higher Priority SI” box below; or Option 2 -- proceed with a combined PA/SI assessment.

Check the box that applies based on the conclusions of the APA:

x	NFRAP		Refer to Removal Program - further site assessment needed
	Higher Priority SI		Refer to Removal Program - NFRAP
	Lower Priority SI		Site is being addressed as part of another CERCLIS site
	Defer to RCRA Subtitle C		Other: _____
	Defer to NRC		

Regional EPA Reviewer:

Bruce A. Schuld 8/6/10

Print Name/Signature Date 8/6/10

PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION:

This claim, also known as the Pittsburg – Idaho Group or P.I. Mine contains some of the most extensive surface and underground disturbances in the Gilmore area. In particular, the claim contains numerous open and caved adits, tunnels, shafts, waste dumps, mine and mill buildings, and an aerial tram way. Although waste dumps are quite voluminous, most of the wastes are apparently barren country rock through which the workings were driven to ore bodies and other underground facilities. There are indications and minor amounts of highly oxidized ore, but nothing that would suggest that these volumes have been released from the site or that humans or sensitive receptors receive significant exposures or doses at these sites. Therefore, DEQ is recommending that this site be Designated as "No Remedial Action Planned" (NRAP).

NOTES: (SEE ATTACHED)

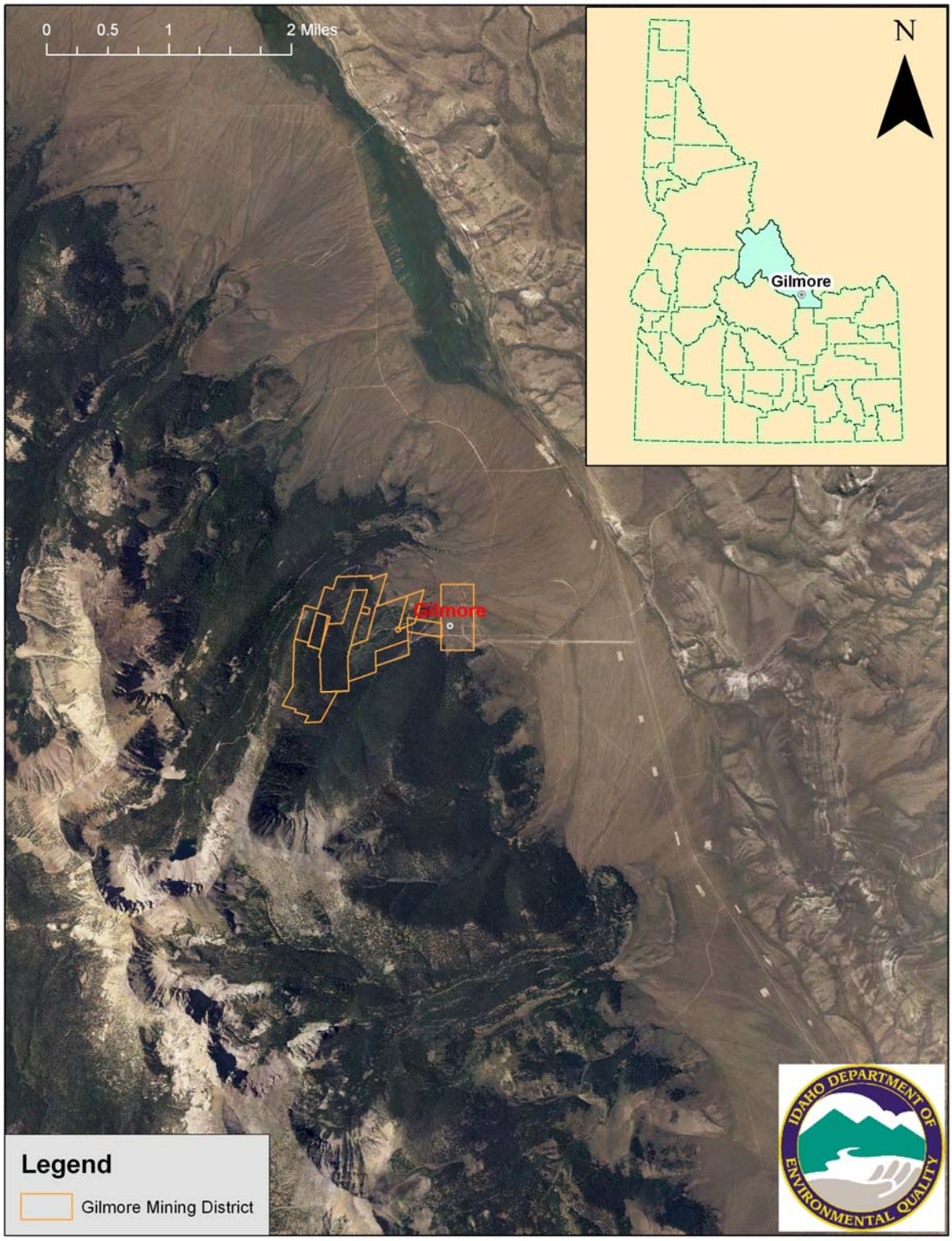


Figure 1. Location of the Gilmore Mining District with Lemhi County 2010 Parcel Data overlay. (Map source: Lemhi County NAIP 2004)

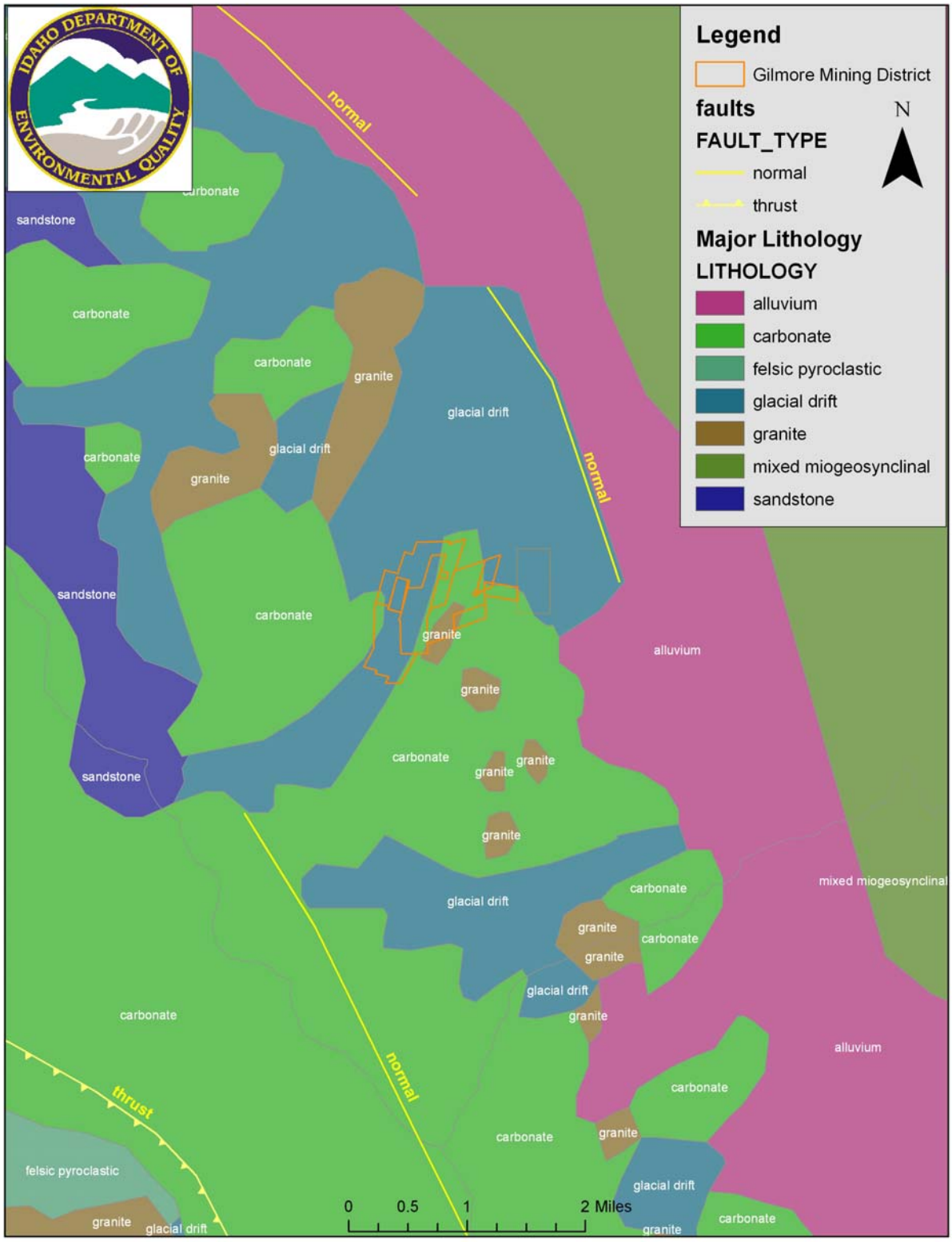


Figure 2. Lithology of the Gilmore Mining District. (Map source: Idaho DEQ ArcSDE 9.2 Geodatabase)

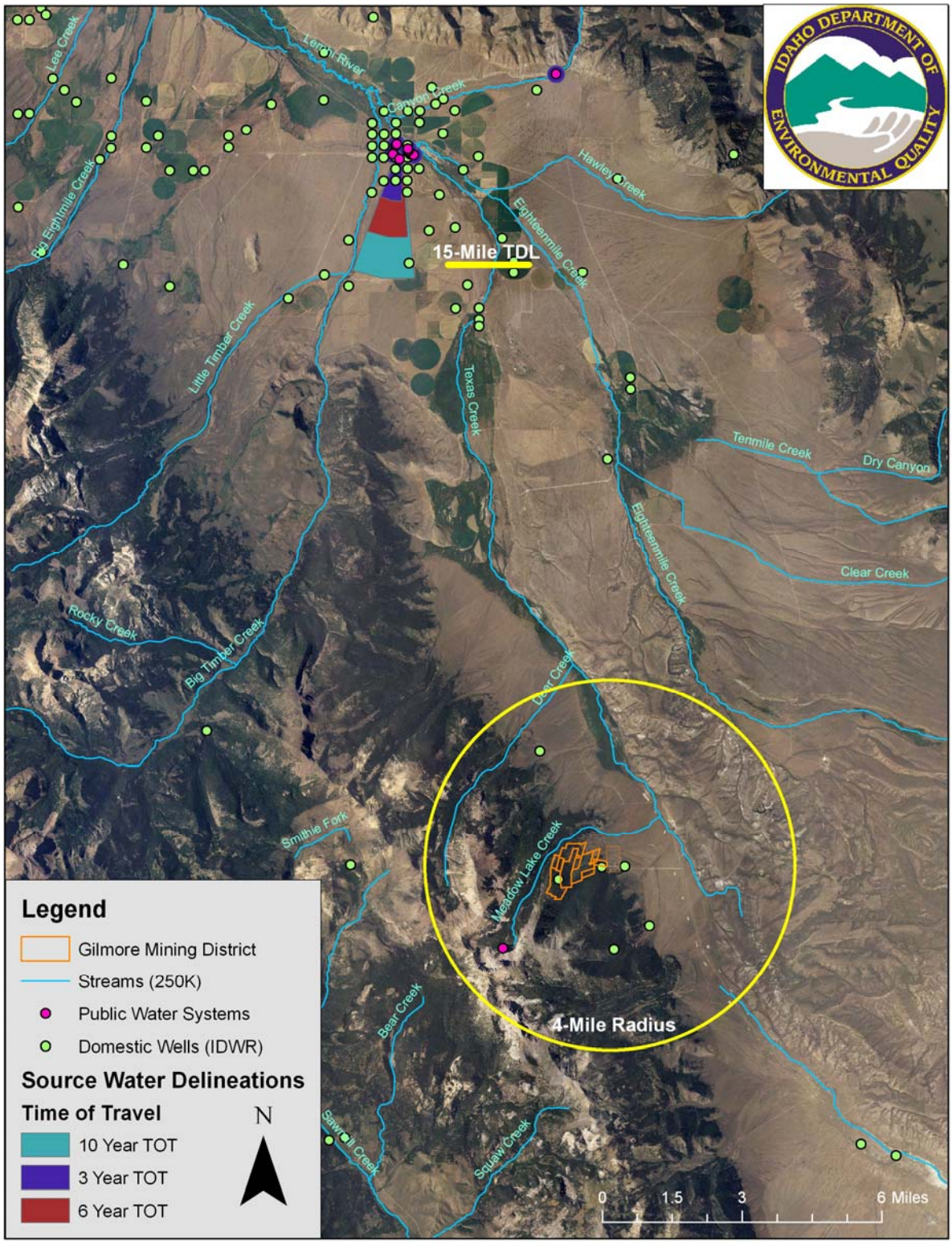


Figure 3. Drinking water well locations and source water delineations. 15-Mile Target Distance Limit (TDL). (Map source: Lemhi County NAIP 2004)

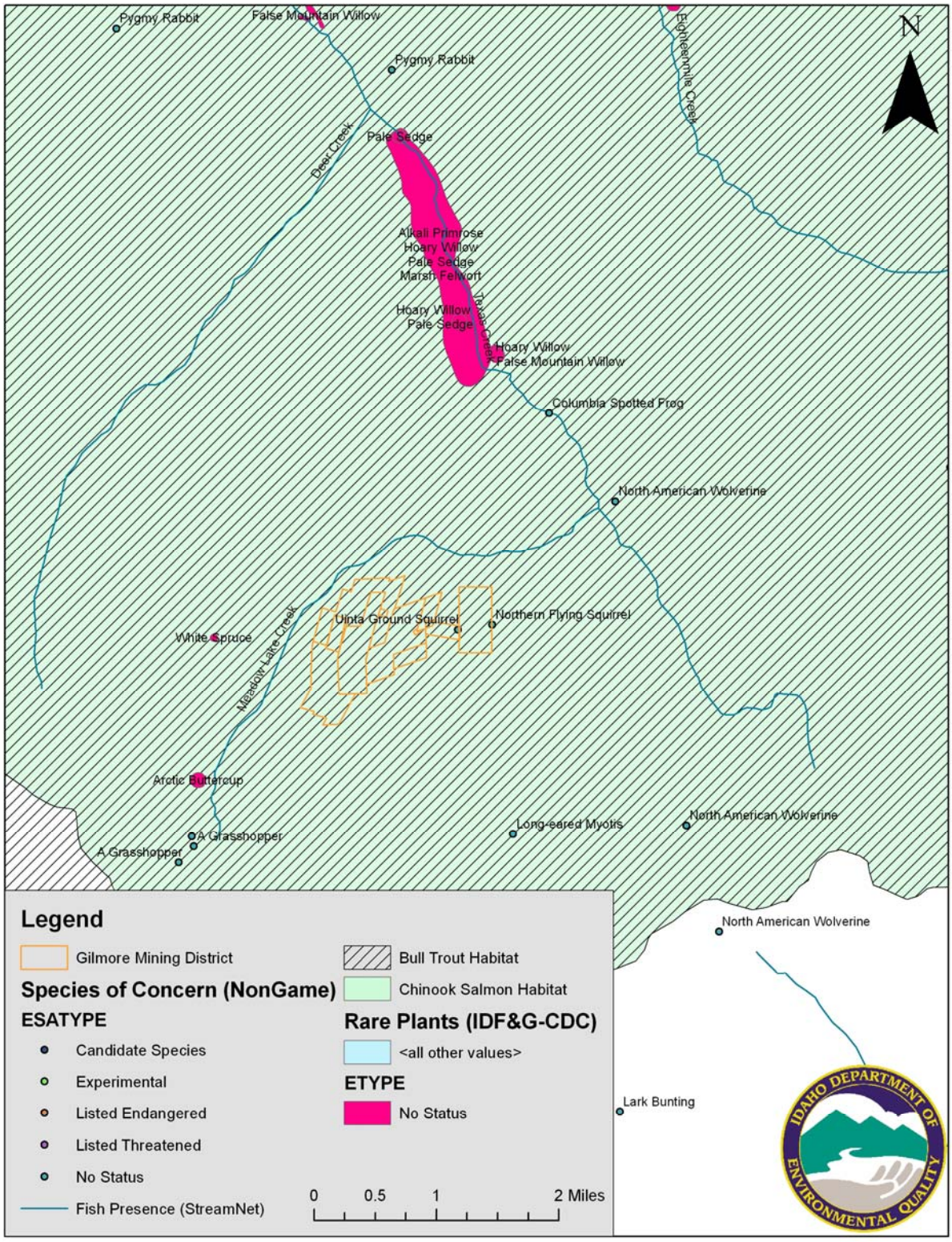


Figure 4. Sensitive species near the Gilmore Mining District. (Map source: Idaho DEQ ArcSDE 9.2 Geodatabase)

Photos and Site Conditions for Patented Claims in Gilmore

The Gilmore Division (Umpleby 1909) of the Texas Mining District contains mixed ownership lands administered by the USDA Forest Service and numerous private individuals or families. Within the area are at least 60 patented and 18 unpatented mine claims. Access was granted to several patented claims in Gilmore and additional observations were made from public access roads and Off Road Vehicle (ORV) trails. DEQ is making recommendations to the U.S. Environmental Protection Agency to designate specific properties or claims as "No Remedial Action Planned" where observations lead to that recommendation, whether or not access was granted to all of the properties. However, neither sampling was conducted nor conclusions were drawn by DEQ regarding about publicly accessible properties where access was not granted to DEQ **and** on which it appears that some human health and ecological risks may be present. DEQ will re-attempt to gain access and work with property owners of these sites.



Photo #1 Historical Marker for the Gilmore Mining area of eth Texas Mining District. (B. Schuld 5/12/10)



Photo #2 Much of the Texas Gilmore area has been subdivided or is being subdivided and sold for recreational residential development (B. Schuld 5/12/10)



Photo 3 Much of the Texas Gilmore area has been subdivided or is being subdivided and sold for recreational residential development (B. Schuld 5/12/10)



Photo #4 The USDA Forest Service Campground at Meadow Lake is one of the major ORV destinations that requires traversing the Gilmore area and mining patents on public roads. (T. Elayer 7/22/10)

During the field work to complete these site assessments, numerous dangerous mine openings were seen. It is not the mission of DEQ to evaluate the physical risks associated with these dangerous openings, nor is it the intent of these reports to draw the attention of recreationists to these openings. Therefore, DEQ is providing this disclaimer: **"Open mine adits, shafts stopes and other physical hazards warrant extreme caution by any visitor to the area. DEQ urges the reader of this report and any public user to exercise extreme caution by avoiding the openings or viewing them from a careful distance"**

Never-the less, DEQ suggests that land owners and the USDA Forest Service who manage or administer lands containing these mine openings managed or close the openings that pose significant physical dangers to visitors. Because of the historic significance and potential habitat issues, considerable thought should be put into how to control or restrict access without losing the existing values of these historic workings.

Glen Claim and Adit

The Glen Claim contains an adit to the "Glen Tunnel" and a small waste dump containing lees than 100 cubic yards of waste. Most of the waste appears to be crystalline country rock with very small quantities of altered rocks that were probably derived from an ore zone. However, the remnants of an ore chute adjacent to the waste dump may indicate that what ore had been extracted was shipped from the site.

The mine opening and waste dump span the public access road to lands administered by they USDA Forest Service and its Meadow Lake Camp Ground (C.G.) Because of the access and proximity to the road, the waste dump was sampled.



Photo #5 The Glen adit and tunnel are adjacent to the Meadow Lake public road. It was apparent that the public has and uses its access to enter and explore this dangerous mine opening. The Glen Waste Dump was sampled since public access traverse it, and although it was small, this sample may provide information about the typical constituents of mine waste in the Gilmore area. (T. Elayer 7/22/10)

In brief, the source (waste dump) for release or exposure to heavy metals laden waste by humans or other sensitive receptors is minimal. Furthermore, there are no indications that there has been a delivery of sediment or leached heavy metals to surface or ground waters. Therefore, DEQ is recommending that this site be Designated as "No Remedial Action Planned" (NRAP).

<u>Latest Out , 16 TO 1, Texas, and Never Sweat mines (a.k.a. Pittsburg Idaho Group, P.I. Mine)</u>

These claims, also known as the Pittsburg – Idaho Group or P.I. Mine contain some of the most extensive surface and underground disturbances in the Gilmore area. In particular, the claims Latest Out, Never seat and Silver Dollar contain numerous open and caved adits, tunnels, shafts, waste dumps, mine and mill buildings, and an aerial tram way. Although waste dumps are quite voluminous, most of the wastes are apparently barren country rock through which the workings were driven to ore bodies and other underground facilities. There are indications and minor amounts of highly oxidized ore, but nothing that would suggest that these volumes have been released from the site or that humans or sensitive receptors receive significant exposures or doses at these sites. Therefore, DEQ is recommending that this site be Designated as "No Remedial Action Planned" (NRAP).



Photo #6 Looking up at the Never Sweat and latest Out Mine waste Dumps from the public Road by the Glen Tunnel Adit (B. Schuld 7/22/10)



Photo #7 Collapsed Shaft on Latest Out Waste Dump (B. Schuld 7/22/10)



Photo #8 Waste Dump and Collapsed Dog House on Latest Out Mine (B. Schuld 7/22/10)



Photo #9 Open Adit on the border of the Latest Out and Never Sweat mines (B. Schuld 7/22/10)



Photo #10 Dangerous Open Adit on the border of the Never Sweat and Latest Out mines. (B. Schuld 7/22/10)

There are at least two very dangerous open adits near the border of the Never Sweat and Latest Out patented claims, the ORV trails, fire rings and trash indicate that there are numerous visitors to these adits areas.



Photo #11 Dog House and Tramway on Never Sweat (B. Schuld 7/22/10)



Photo #12 Dog House and Tram House on Never Sweat (B. Schuld 7/22/10).



Photo #13 Dog House and Tram House on Never Sweat (B. Schuld).

Silver Dollar and Silver Dollar Extension

The Silver Dollar claim contains two major surface and underground mine facilities. On the south side of the claim is the Silver Dollar Shaft that connects to the P.I. Tunnel driven from the Martha Claim at the 200' Level. Near the collar of the Shaft is an extensively caved stope that extends westward onto the 16 TO 1 Claim. Although the dumps beneath the shaft are extensive very little remains of the ore bearing rock, and the waste dump is dominated by barren country rock excavated during the development of the Shaft. In the northeastern portion of the claim there are three open adits, one caved

adit, and a voluminous waste dump containing large volumes of barren country rock and highly altered (oxidized) sulfide bearing wastes, presumably ore.

The Silver Dollar Extension has been traversed by numerous cat (Bulldozer) trails and possibly drill pads. But there is no evidence that any significant development occurred on this claim.

Although these observations were made from the public road and well developed ORV trails developed by site visitors, DEQ did not collect samples or evaluate the volumes of wastes at the Shaft or adit sites. DEQ's observations have lead to two different conclusions. First, both the 16 TO 1 and Silver Dollar Extension should be designated as NFRAPs since there are no significant wastes or exposure pathways. Second, the Silver Dollar Claim has potentially significant human health and ecological risks that should be assesses particularly in light of the fact that the area is being routinely subdivided and developed for recreational and residential properties.



Photo #14 Collapsed dog House on the Waste Dump for the Siler Dollar Shaft



Photo#15 Dangerously open stope on the border of the Silver Dollar and 16 To 1 patented claims (B. Schuld 7/22/10).



Photo #16 Caved Stopes and cross cuts extend from the open shaft on the west side of the Silver Dollar claim onto the 16 To 1 claim



Photo #17 Looking down on waste dump and hoist house foundation of the Silver Dollar Shaft. (B. Schuld 7/22/10).



Photo #18 Dangerous Open Shaft on the west side of the Silver Dollar Claim (B. Schuld 7/22/10).



Photo #19 Some of the most recent development of the underground Silver Dollar was apparently done at what is now a caved adit. (B. Schuld 7/22/10).



Photo #20 Three dangerously open adits remain on the Silver Dollar. There as apparently some redevelopment work that was conducted on these adits and a small ore bin/chute was constructed to ship some ore or samples (B. Schuld 7/22/10).

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Photo #21 Three dangerous open adits remain on the Silver Dollar. There as apparently some redevelopment work that was conducted on these adits and a small ore bin/chute was constructed to ship some ore or bulk samples (B. Schuld 7/22/10).

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Photo #22 Although a fairly significant volume of altered rock/ore is present at the Silver Dollar no samples were collected, and no further analysis will be made pending granting of access(B. Schuld 7/22/10).

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Photo #23 Three dangerously open adits remain on the Silver Dollar. There as apparently some redevelopment work that was conducted on these adits and a small ore bin/chute was constructed to ship some ore or samples. (B. Schuld 7/22/10).

G.A.P. and La Porte patented claims

The G.A.P. and La Porte patented claims had little or no historic mine developments on them. The most significant developments included the historic Gilmore Cemetery on the G.A.P and the trailer sites developed by the owners of the La Porte. In brief, the source (waste dump) for release or exposure to heavy metals laden waste by humans or other sensitive receptors is minimal. Furthermore, there are no indications that there has been a delivery of sediment or leached heavy metals to surface or ground waters. Therefore, DEQ is recommending that this site be Designated as "No Remedial Action Planned" (NRAP).



Photo #24 Entrance to the Historic Gilmore Cemetery (B. Schuld 7/22/10).



Photo #25 Gilmore Cemetery on the G.A.P. patented mining claim (B. Schuld 7/22/10).



Photo #26 Looking southwest along the southern boundary of the La Porte patented claim. (B. Schuld 7/22/10).



Photo #27 Looking along the eastern claim boundary of the La Porte from the north east corner. (B. Schuld 7/22/10).



Photo #28 View across the Never Sweat, Silver Dollar, Martha, Dorothy, and G.A.P. patented claims from the Latest Out Mine waste Dump. (B. Schuld 7/22/10)

Dorothy and Martha Patented Claims

The Dorothy and Martha patented claims contain numerous major mine developments. On the north side of the Dorothy next to the public road is the adit to the Dorothy Tunnel and Waste Dump, and portions of the Allie and P.I. Waste Dumps. On the north side of the Martha claim are the adits to the Allie and P.I. tunnels, their waste dumps and part of the "Old" Gilmore Town site.

Access was explicitly denied to these properties by the Canada Family Trust's realtor, but observations were made regarding these claims from the public road and ORV trails that were not posted. Furthermore, a waste sample was collected on the Allie/P.I. Waste Dump where the dump encroached on the road (or visa versa).



Photo #29 Public Access Road through patented claims in Gilmore. This location is between the Allie/P.I. tunnel adits and the toe of the Dorothy Tunnel Waste Dump.

The portion of the Allie/P.I. Waste Dump that may be seen (above) just on the left hand side of the road was sampled (Sample #####) because it is in contact with the public right of way, and because it may be representative of typical mine wastes found in the Gilmore mine sites. Observations regarding the waste dump material, the proximity of the dumps to the public road, the well developed ORV trails through the properties and interest shown by potential buyers have led DEQ to conclude that the claims should be assessed if formal access is granted by the Canada family Trust.



Photo#30 Allie and PI waste dump(s) along side of the public road to Meadow Lake C.G. through the patented claims in Gilmore(B. Schuld 7/22/10).



Photo#31 Caved adit of the Allie Tunnel along side of the public road. (B. Schuld 7/22/10).



Photo #32 Caved adit for the Pittsburg-Idaho (P.I. Tunnel) (B. Schuld 7/22/10)



Photo #33 Caved adit for the Pittsburg-Idaho (P.I. Tunnel) (B. Schuld 7/22/10).



Photo#34 Allie and PI waste dump(s) along side of the public road through the patented claims in Gilmore. (B. Schuld 7/22/10).



Photo#35 Allie and PI waste dump(s) along side of the public road through the patented claims in Gilmore. (B. Schuld 7/22/10).



Photo#36 Dangerous opening of the Dorothy Tunnel adit. (B. Schuld 7/22/10).



Photo#37 Dangerous opening of the Dorothy Tunnel adit. (B. Schuld 7/22/10).

<u>Andy, Gilmore, Vick, Elk and Elk No. 2 (a.k.a. "Old" Gilmore Town Site and Allie Group)</u>

These claims contain some historic mine developments, but their dominant feature is the "old" Gilmore Town Site. Although several collapsed features and open adits are present on the Andy and Gilmore claims, neither contains volumes of wastes, ore that may pose significant threat to humans or sensitive receptors. Looking downhill from the Gilmore waste dump onto the Elk and Elk No. 2 led to a conclusion that no significant workings were located on these properties. Therefore, DEQ is recommending that these sites be Designated as "No Remedial Action Planned" (NRAP).

Because the Vick claim contained a residence, and was not accessible by well developed ORV trails, DEQ did not enter the property, make any observations or collect any data on the property. Casual observations indicated that the property probably did not contain any human health or ecological threat, but formal access should be sought and the site assessed to validate this conclusion.



Photo #38 Concrete Dog House and Tunnel Adit on Andy Claim on north end of the "Old" Gilmore Town site.



Photo #39 Waste Dump developed by excavation of the Gilmore Mine Adit and Decline.(B. Schuld 7/22/10)



Photo#40 Gilmore Mine Adit and Decline (B. Schuld 7/22/10)



Photo#41 The Gilmore Decline is a dangerous opening that is frequented by tourists (B. Schuld 7/22/10).



Photo #42 Gilmore Adit and Decline waste Dump. (B. Schuld 7/22/10).



Photo #43 Gilmore Adit is a dangerous opening that is frequented by tourists (B. Schuld 7/22/10).

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Photo #44 Bunkhouse in the "old Gilmore Town site (B. Schuld 7/22/10).



Photo #45 Abandoned buildings in the "Old" Gilmore Town Site. (B. Schuld 7/22/10).



Photo # 46 Mining Office (?) in the "Old" Gilmore Town site. (B. Schuld 7/22/10).

Ruth and Olive Patented Claims

Access to the Ruth and Olive claims was never received and all local access is posted. Therefore DEQ did not enter or make any specific observations about the properties. However, given the size of the dumps and workings that can be seen from public access, DEQ has concluded that these properties should be assessed if access can be obtained.



Photo #47 Looking down onto the Ruth and Olive Claims from the Gilmore Waste Dump. Note the large stockpiles of materials that were supposedly being reprocessed on the Ruth and Olive (B. Schuld 7/22/10).

Miscellaneous Mine Claims. Mixer, Cook, Hatton, Annex, Roy Launder, Eddie, W.H. Cannon

Although formal access to these properties was not given to DEQ, general observations made from public access, maps and ortho photo quads indicates that little if any significant mining development occurred on these properties. Therefore, DEQ is recommending that these properties be Designated as "No Remedial Action Planned" (NRAP).



Photo #48 Gilmore background Soil Sample Location (B. Schuld 7/22/10)

