March 28, 2012

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

RE: Abbreviated Preliminary Assessment Report for the Trout Group, Idaho County, Idaho

Dear Mr. Marcy:

Attached is an Abbreviated Preliminary Assessment (APA) for the Trout Group Mine in the Crooked River drainage near Orogrande, Idaho. The Idaho Department of Environmental Quality (DEQ) did not visit this property due to lack of contaminant sources and receptors at this site.

A site inspection was conducted by the Idaho Geological Survey (IGS) in 1999. IGS observed the following:

This site is very small and consists of one open adit and a cabin. The adit is along Road 233, about 20 feet south of and just above the road. The dump has been removed by road construction. The cabin is on the north side of Crooked River opposite the open portal and is mostly collapsed. The disturbed area is minimal.

The site inspection conducted by IGS provided direct observations that confirmed sources of contaminants of concern including hazardous materials and petroleum products were not present in quantities that pose a threat to human health or the environment. No contaminants or hazardous substances remain on the site. No surface water, ground water or airborne pathways were detected. No occupied homes or cabins exist on the claim and no homes or cabins exist below the mine in the Crooked River drainage.

As a result of the above information, DEQ recommends the property status of the Trout Group Mine site be designated as No Remedial Action Planned (NRAP).

EPA should note that the portal for the adit is easily accessible and is adjacent to a heavily traveled road. The adit appears to be open for 20 feet or more. DEQ recommends the U.S. Forest Service either reclaim the adit entrance or block access to the interior of the adit.
A link to DEQ’s Trout Group Mine APA can also be found on DEQ’s Mining 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

attachment

cc: Clint Hughes – USFS
Scott Sanner – BLM
Trout Group Mine File
ABBREVIATED PRELIMINARY ASSESSMENT

This is an Abbreviated Preliminary Assessment (APA) for the Trout Group Mine in the Crooked River drainage near Orogrande, Idaho. This document provides the rationale for the determination of No Remedial Action Planned (NRAP) and that no additional analysis or site investigation is necessary for the Trout Group Mine. The information to produce this document was taken from the 2003 Idaho Geological Survey (IGS) report. A map generated during desktop research is attached.

Preparer: Daniel D. Stewart
Idaho Department of Environmental Quality
300 W. Main
Grangeville, ID 83530
(208) 983-0808
daniel.stewart@deq.idaho.gov

Date: 3/20/12

Site Name: Trout Group

Previous Names (aka): Trout Group Mine

Site Owner: U.S. Forest Service

Address: c/o Mr. Clint Hughes
Nez Perce National Forest
104 Airport Road
Grangeville, ID 83530

Site Location: From IGS 2003:
The mine is at road level on the south side of County Road 233, approximately 3.7 miles southwest of the junction with State Highway 14. The property is on land administered by the Forest Service.

Township 28 North, Range 7 East, Section 2

Latitude: 45.7913°N Longitude: -115.55282°W

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

DEQ did not visit this property due to lack of contaminant sources and receptors at the Trout Group Mine site.
The Trout Group Mine was investigated by IGS on June 7, 1999. IGS reported one adit which is open, but apparently dry. The waste dump has been removed by road construction.

The IGS report contained no information indicating any environmental concerns were observed or documented. This would indicate no potential releases of heavy metals by airborne means or surface and ground water existed which would cause any human health risks or ecological health risks. Additionally, potential discharges of other deleterious materials, such as petroleum products and ore processing chemicals would have been investigated.

**Part 1 - Superfund Eligibility Evaluation**

<table>
<thead>
<tr>
<th>If all answers are “no” go on to Part 2, otherwise proceed to Part 3.</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Is the site currently in CERCLIS or an “alias” of another site?</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>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 NRC, UMTRCA, or OSHA)?</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>4. Are the hazardous substances that may be released from the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>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 ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, or an EPA approved risk assessment completed)?</td>
<td>x</td>
<td></td>
</tr>
</tbody>
</table>

**Please explain all “yes” answer(s):**

The site inspection conducted by IGS provided direct observations that confirmed sources of contaminants of concern including hazardous materials and petroleum products were not present in quantities that pose a threat to human health or the environment. No contaminants or hazardous substances remain on the site. No surface water, ground water or airborne pathways were detected. No occupied homes or cabins exist on the claim and no homes or cabins exist below the Trout Group Mine in the Crooked River drainage.
**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.**

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does the site have a release or a potential to release? x</td>
<td></td>
</tr>
<tr>
<td>2. Does the site have uncontained sources containing CERCLA eligible substances? x</td>
<td></td>
</tr>
<tr>
<td>3. Does the site have documented on-site, adjacent, or nearby targets? x</td>
<td></td>
</tr>
</tbody>
</table>

**If the answers to questions 1, 2, and 3 above were all “yes” then answer the questions below before proceeding to Part 3.**

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
</tr>
<tr>
<td>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 one mile)?</td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**

It is unlikely any human health risks or ecological health risks are associated with this mine site. No surface water, ground water or airborne pathways were reported by IGS. No occupied homes or cabins exist on the claim and none are present downstream of the mine. There is no mention of any drinking water sources and no homes are in close proximity or downstream of the mine in the Crooked River drainage. No waste dump remains and no mention was made of any water exiting the adit.

During the site assessment, DEQ used references from several different documents including U.S. Geological Survey (USGS) maps, county tax rolls, and historical reports that have spelled numerous claim names, town sites, and/or geographic features differently from one and another. DEQ’s use of the different spellings is to remain in context with the reference used for each given section of text or written in this report.
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. The assessor should 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 judgment when evaluating a site. Your judgment may be different from the general recommendations for a site given below.

<table>
<thead>
<tr>
<th>Suspected/Documented Site Conditions</th>
<th>APA</th>
<th>Full PA</th>
<th>PA/SI</th>
<th>SI</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Releases or potential to release are not documented at the site. YES</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Uncontained sources with CERCLA-eligible substances have not been documented as being present on the site. (i.e., they do exist at site) YES</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. On-site, adjacent, or nearby receptors are not present. YES</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. There is no documentation or observations made leading to the conclusion that a sensitive receptor is present or may have been exposed (e.g., drinking water system user inside four mile TDL). YES</td>
<td>Option 1: APA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. There is documentation that a sensitive receptor has been exposed to a hazardous substance released from the site. NO</td>
<td>Option 2: Full PA or PA/SI</td>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>6. 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. NO</td>
<td>Option 1: APA SI</td>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Option 2: PA/SI</td>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>7. 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 one mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site. NO</td>
<td></td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>8. There are: no indications of a hazardous substance release; 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</td>
<td></td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
</tbody>
</table>
Part 3 - DEQ 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 “NRAP” 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:

<table>
<thead>
<tr>
<th></th>
<th>No Remedial Action Planned (NRAP)</th>
<th>Defer to NRC</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Higher Priority SI</td>
<td>Refer to Removal Program</td>
</tr>
<tr>
<td></td>
<td>Lower Priority SI</td>
<td>Site is being addressed as part of another CERCLIS site</td>
</tr>
<tr>
<td></td>
<td>Defer to RCRA Subtitle C</td>
<td>Other:</td>
</tr>
</tbody>
</table>

DEQ Reviewer:

[Signature]

Daniel D. Stewart

Date: 3/28/12

Please Explain the Rationale for Your Decision:

The 2003 IGS report indicated no areas of concern were found. No occupied homes or cabins exist on the site, thus no pathways exist relative to human health risks or environmental risks. No homes or cabins are downstream of the Trout Group Mine in the Crooked River drainage. No drinking water sources or residences exist in close proximity to the mine. IGS did not indicate any hazardous or deleterious materials on site. This site is far from any inhabited area.

As a result of the information contained in this APA, DEQ recommends the property status of the Trout Group Mine be designated as No Remedial Action Planned (NRAP).

Notes:

The italicized text below was taken directly from the 2003 IGS report.

Site Description: This site is very small and consists of one open adit and a cabin. The adit is along Road 233, about 20 feet south of and just above the road. The dump has been removed by road construction. The cabin is on the north side of Crooked River opposite the open portal and is mostly collapsed. The disturbed area is minimal.

Geologic Features: The Trout Group is along a northeast-trending fault in steeply dipping rocks of the biotite gneiss and schist of the Middle or Early Proterozoic Elk City metamorphic sequence (Lewis and others, 1990, 1993).
**History:** There is no information on the history of the Trout Group.

**Structures:** There is one mostly collapsed building on the north side of Crooked River opposite the portal of the adit.

**Safety:** The portal for the adit is easily accessible and is adjacent to a heavily traveled road. The adit appears to be open for 20 feet or more.

DEQ recommends the U.S. Forest Service either reclaim the adit entrance or block access to the interior of the adit.

**References:**


Topographic Overview Map of the Trout Group Mine Location. 10/25/2011. 1:24,000. Daniel Stewart; National Geographic Topographic Software.


**Attachment:**

Map
Topographic Overview Map of the Trout Group Mine Location  
(Map Source: National Geographic Topographic Software).