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 Umatilla Prospect,
Idaho County, Idaho

Dear Mr. Marcy:

Attached is an Abbreviated Preliminary Assessment (APA) for the Umatilla Prospect 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:

The site consists of one open adit with water discharging from the portal, a large waste dump, equipment, and two buildings. Some newer timbers at the portal of the adit are in fairly good condition, although a few older timbers have collapsed. A sheet of plywood with the words "bad air" may block the adit not far inside the portal. Most of the water discharges from the adit through a pipe, although some flows around the pipe and onto the dump. The rate of discharge is approximately 3 gallons per minute. The water seeps through the dump and flows into Umatilla Creek. A small building and an air compressor are just west of the portal. An air pipe goes from the compressor into the portal, and mine rails extend across the dump. At the edge of the dump, the rails split, with one branch going east and the other west. A yellow ore car is on the rails at the west end of the dump. Piles of timbers and air pipe, along with a minor amount of scrap metal, are also on the dump, which measures approximately 100 feet long, 30 feet wide, and 20 feet thick. The shaft mentioned in Shenon and Reed (1934) was not found. The disturbed area covers about 1-2 acres.

IGS collected four water samples: upstream of the Umatilla Prospect adit, from the adit, downstream from the adit, and from the waste dump seep. The water sample from the Umatilla Prospect adit was within the range of the Secondary MCL and exceeded the Aquatic Life Chronic standard for aluminum in the dissolved metals screen. In the total recoverable metals screen, copper was within the range of the Aquatic Life Chronic standard.

The upstream sample was within the range of the Secondary MCL for aluminum in the dissolved metals screen. Copper was at the lower limit of the Aquatic Life Chronic standard in the total recoverable metals screen.

The downstream sample was within the range of the Secondary MCL and exceeded the Aquatic Life Chronic standard for aluminum in the dissolved metals screen. Copper was within the range of the Aquatic Life Chronic standard in the total recoverable metals screen.
One water sample was collected by IGS from the dump seep that exceeded all standards for aluminum, the Secondary MCL and the Aquatic Life Acute standard for iron, and the Secondary MCL for manganese in the dissolved metals screen. In the EPA 200.8 test, lead exceeded the Aquatic Life Chronic standard. In the total recoverable metals screen, cadmium equaled or exceeded all standards, iron exceeded the Secondary MCL and the Aquatic Life Acute standard, manganese exceeded the Secondary MCL, copper was within the range of the Aquatic Life Chronic standard, and zinc was within the range of both Aquatic Life standards.

IGS reported:

An examination of other water samples taken from mines in the same geology and vicinity show similar elevated metals concentrations. These values are not remarkable and it is unlikely any human health risks or ecological health risks are associated with this area.

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.

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

IGS reported the open adit can easily be entered. The fact that the mine was re-timbered in 1988 may reduce the hazard of caving. However, the sign warning of “bad air” suggests the potential for other hazards at this site. **DEQ strongly recommends that if the U.S. Forest Service has not already sealed off and blocked this adit, it must be done.**

A link to DEQ’s Umatilla Prospect 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  
     Umatilla Prospect File
ABBREVIATED PRELIMINARY ASSESSMENT

This is an Abbreviated Preliminary Assessment (APA) for the Umatilla Prospect 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 Umatilla Prospect 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: 3/21/12

Site Name: Umatilla Prospect

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:

*Access is via County Road 233 (the Crooked River Road) approximately 12.3 miles south from the intersection with State Highway 14 to Old Orogrande. FS Trail 801 is 0.1 mile south of Old Orogrande on Road 233. Trail 801 crosses Crooked River and goes approximately 2 miles northwest along Umatilla Creek to Trail 871. The mine is about 1/2 mile farther along Umatilla Creek on Trail 871. This trail is not maintained and is very difficult to follow.*

Township 27 North, Range 7 East, Section 3

Latitude: 45.70707°N  Longitude: -115.57441°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 Umatilla Prospect site.
The Umatilla Prospect was investigated by IGS on July 6, 1999. IGS reported one open shaft with water discharging from the portal, a large waste dump, equipment, and two buildings. A waste dump (water) sample and an adit water sample were collected. In addition two water samples were taken in Umatilla Creek, one being above where the adit discharge meets the creek and the other being below. The sample results will be discussed later in this document.

The IGS report contained no information indicating any environmental concerns were observed or documented with the exception of the samples taken. The sample results indicate elevated metals levels, but consistent with sampling/monitoring in the area. 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>
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<tr>
<td>2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?</td>
<td>x</td>
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<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>
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<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>
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<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>
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</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.
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>
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<tbody>
<tr>
<td></td>
<td>x</td>
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<td></td>
<td>x</td>
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<td></td>
<td>x</td>
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</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>
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Notes:

It is unlikely any human health risks or ecological health risks are associated with this mine site. Although surface water and possibly ground water with elevated metals exist on the site, the metals levels are consistent with other monitoring/sampling DEQ has conducted in this general area. The Orogrande Mining District is a highly mineralized area; with elevated metals detected in background samples as well as mine related samples.

No airborne pathways were reported by IGS. No occupied homes or cabins exist on the claim. Water samples from Umatilla Creek above and below the adit discharge and the adit discharge showed elevated levels of aluminum and copper. There is no mention of any drinking water sources and no homes are within the drainage or in close proximity. This area is controlled by the U.S. Forest Service with the closest patented/private ground approximately 1.5 miles away.

Compared to expected background and environmental values, sample E7069905 from the Umatilla waste dump has elevated levels of cadmium, copper, iron, manganese, nickel, and lead in the element screen. No metals of significance are leaching from the sample in the TCLP for metals test.

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. <strong>YES</strong></td>
<td></td>
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<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) <strong>YES</strong></td>
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<tr>
<td>3. On-site, adjacent, or nearby receptors are not present. <strong>YES</strong></td>
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<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). <strong>YES</strong></td>
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<tr>
<td>5. There is documentation that a sensitive receptor has been exposed to a hazardous substance released from the site. <strong>NO</strong></td>
<td></td>
<td>Option 2: Full PA or PA/SI</td>
<td></td>
<td></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. <strong>NO</strong></td>
<td></td>
<td>Option 1: APA SI</td>
<td>Option 2: PA/SI</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. <strong>NO</strong></td>
<td></td>
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<td></td>
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</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. <strong>NO</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Part 3 - DEQ Site Assessment Decision

When completing Part 3, use Part 2 and Exhibit I 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 I): 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>
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</thead>
<tbody>
<tr>
<td></td>
<td>Higher Priority SI</td>
<td>Refer to Removal Program</td>
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<td></td>
<td>Lower Priority SI</td>
<td>Site is being addressed as part of another CERCLIS site</td>
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<tr>
<td></td>
<td>Defer to RCRA Subtitle C</td>
<td>Other:</td>
</tr>
</tbody>
</table>

DEQ Reviewer:

[Signature]
Daniel D. Stewart
Date: 3/27/12

Please Explain the Rationale for Your Decision:

The 2003 IGS report indicated no occupied homes or cabins exist on the site, thus no pathways exist relative to human health risks or environmental risks. No drinking water sources or residences exist in the Umatilla Creek drainage. IGS did not report any hazardous or deleterious materials on site. This site is not easily accessible and somewhat remote. It is unlikely any human health risks or ecological health risks are associated with this mine site. Although surface water and possibly ground water with elevated metals exist on the site, the metals levels are consistent with other monitoring/sampling DEQ has conducted in this general area. The Orogrande Mining District is a highly mineralized area; with elevated metals detected in background samples as well as mine related samples.

Water samples from Umatilla Creek above and below the adit discharge and the adit discharge showed elevated levels of aluminum and copper. These results are not remarkable for a highly mineralized area and are typical for this geology.

A waste dump soil sample had elevated concentrations of cadmium, copper, iron, manganese, nickel, zinc, and lead. No metals of significance are leaching from the sample in the TCLP for metals test.

As a result of the information contained in this APA, DEQ recommends the property status of the Umatilla Prospect be designated as No Remedial Action Planned (NRAP).
Notes:

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

**Site Description:** The site consists of one open adit with water discharging from the portal, a large waste dump, equipment, and two buildings. Some newer timbers at the portal of the adit are in fairly good condition, although a few older timbers have collapsed. A sheet of plywood with the words "bad air" may block the adit not far inside the portal. Most of the water discharges from the adit through a pipe, although some flows around the pipe and onto the dump. The rate of discharge is approximately 3 gallons per minute. The water seeps through the dump and flows into Umatilla Creek. A small building and an air compressor are just west of the portal. An air pipe goes from the compressor into the portal, and mine rails extend across the dump. At the edge of the dump, the rails split, with one branch going east and the other west. A yellow ore car is on the rails at the west end of the dump. Piles of timbers and air pipe, along with a minor amount of scrap metal, are also on the dump, which measures approximately 100 feet long, 30 feet wide, and 20 feet thick. The shaft mentioned in Shenon and Reed (1934) was not found. The disturbed area covers about 1-2 acres.

**Geologic Features:** The Umatilla Mine is in Late Cretaceous biotite granodiorite near a contact with the biotite gneiss and schist unit of the Middle or Early Proterozoic Elk City metamorphic sequence. The mine is near a northwest-trending fault (Lewis and others, 1990, 1993). Shenon and Reed (1934) noted there are either two quartz veins on the property or faulted segments of one vein. Platinum mineralization was reported to have been discovered in 1980 in a 50-75-foot-wide peridotite dike located about 3,000 feet from the Umatilla. Other minerals in the dike included pyrrhotite, pentlandite, and chalcopyrite (Bennett and others, 1999).

**Water Sample:** Sample E7069901 from the Umatilla adit is within the range of the Secondary MCL and exceeds the Aquatic Life Chronic standard for aluminum in the dissolved metals screen. In the total recoverable metals screen, copper is within the range of the Aquatic Life Chronic standard.

Upstream sample E7069902 is within the range of the Secondary MCL for aluminum in the dissolved metals screen. Copper is at the lower limit of the Aquatic Life Chronic standard in the total recoverable metals screen.

Downstream sample E7069903 is within the range of the Secondary MCL and exceeds the Aquatic Life Chronic standard for aluminum in the dissolved metals screen. Copper is within the range of the Aquatic Life Chronic standard in the total recoverable metals screen.

**Soil/Dump Sample:** Sample E7069904 from the dump seep exceeds all standards for aluminum, the Secondary MCL and the Aquatic Life Acute standard for iron, and the Secondary MCL for manganese in the dissolved metals screen. In EPA 200.8 test, lead exceeds the Aquatic Life Chronic standard. In the total recoverable metals...
screen, cadmium equals or exceeds all standards, iron exceeds the Secondary MCL and the Aquatic Life Acute standard, manganese exceeds the Secondary MCL, copper is within the range of the Aquatic Life Chronic standard, and zinc is within the range of both Aquatic Life standards.

An examination of other water samples taken from mines in the same geology and vicinity show similar elevated metals concentrations. These values are not remarkable and it is unlikely any human health risks or ecological health risks are associated with this area.

**History:** The Umatilla Mining Company was incorporated in 1905. Jellum (1909) noted the property had an 800-foot tunnel with 610 feet of drifts and at least nine crosscuts, a 100-foot shaft, and numerous open pits. By 1913, the company reported 2,000 feet of workings. Umatilla Mining forfeited its corporate charter in late 1912.

Shenon and Reed (1934) reported a 750-foot crosscut with 900 feet of drifts and a 65-foot shaft on the property. Far West Gold-Silver Mining Company (incorporated in 1936) acquired the mine in the late 1930s. The company changed its name to Sierra Silver-Lead Mining Company in 1948. Sierra Silver-Lead held the Umatilla property until about 1950, when the company's focus shifted to the Coeur d'Alene district. Sierra Silver-Lead merged with the Atlas Mining Company in 1998. In 1987, Silver Crystal Mines explored the Umatilla Mine as part of a larger exploration program. Platinum was supposedly discovered in 1980. The Umatilla adit was cleaned out, new rails laid, and a new drift started 650 feet from the portal. Grab samples from the new drift were said to assay 0.31 ounces of gold and 1 ounce platinum per ton. Silver Crystal worked with Idaho Mining and Development and Idaho Platinum Resources to build a pilot wet chemical extraction plant near the mine. In 1988, Silver Crystal drove 117 feet of new drift in the Umatilla Mine. In the process, the adit was retimbered (Bennett and others, 1999).

**Structures:** There is a small building in good condition 50 feet west of the portal and a totally collapsed log building 400 feet southeast of the mine.

**Safety:** The open adit can easily be entered. The fact that the mine was re-timbered in 1988 may reduce the hazard of caving. However, the sign warning of "bad air" suggests the potential for other hazards at this site.

DEQ strongly recommends that if the USFS has not sealed off and blocked the above referenced adit, it must be done.
References:


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

Attachment:
Map
Topographic Overview Map of the Umatilla Prospect Location
(Map Source: National Geographic Topographic Software).