



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

December 22, 2009

Atlas Mine & Mill Supply
North 1115 Havana St.
Spokane, WA 99202

RE: Site Assessment of the Indian Queen

Dear Mr. Sir/Madam:

The Idaho Department of Environmental Quality (IDEQ) has completed a review of historical mining data and geological information of the above referenced mine and claim. Subsequent to that review, IDEQ conducted a site visit of the Indian Queen claim. During the site visit, mining facilities were observed and mapped in order to complete the analysis necessary to complete an Abbreviated Preliminary Assessment.

PAs are conducted according to the Federal Comprehensive Environmental Response, Compensation and Liabilities Act (CERCLA). The reasons to complete a Preliminary Assessment include:

- 1) To identify those sites which are not CERCLIS caliber because they do not pose a threat to public health or the environment (No Remedial Action Planned (NRAP));
- 2) To determine if there is a need for removal actions or other programmatic management of sites;
- 3) To determine if a Site Investigation, which is a more detailed site characterization, is needed; and/or
- 4) To gather data to facilitate later evaluation of the release of hazardous substances through the Hazard Ranking System (HRS).

IDEQ has also completed PAs under contract with the U.S. Environmental Protection Agency in order to identify risks to human health and the environment, and make recommendations to land owners regarding how risks might be managed, if necessary.

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No samples were collected during the site visit because no significant mine waste dumps or effluent discharges were observed. There was no evidence of acid mine drainage or impacted surface waters. Based on a number of factors discussed in the following report, IDEQ has determined that No Remedial Action is Planned (NRAP) for this property.

Attached is an Abbreviated Preliminary Assessment Checklist. The checklist was used because it was relatively obvious that this site would likely not score through the Hazard Ranking System. Also enclosed is a copy of the mine history, limited geologic information, and maps of the property and surrounding area, and a brief checklist of how IDEQ came to its determination that the property status is a NRAP.

IDEQ very much appreciates your cooperation and approval for our access, and looks forward to addressing any questions you may have regarding our findings. Please call me (208-373-0554) if you have any comments, questions, or if I may be of any other assistance.

Sincerely,



Bruce A. Schul
Mine Waste Projects Coordinator
Waste Management and Remediation Division

Attachments

cc: Ken Marcy – U.S. Environmental Protection Agency
Indian Queen Claim File

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: Brian Gaber 12/4/09
 (Name/Title) (Date)
1410 N. Hilton, Boise, ID 83706 (208) 373-0566
 (Address) (Phone)
brian.gaber@deq.idaho.gov
 (E-Mail Address)

Site Name: Indian Queen

Previous Names (if any):

Site Location: Bullion Gulch Approx. 5.5 miles W/SW of Hailey, Idaho

Township T2N Range R17E Section 22

Latitude: 43.4960 **Longitude:** -114.4118

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 adit.

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). _____

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:

The area investigated by DEQ staff contained approximately a few indistinct prospects. No water was observed exiting from the prospects. A small waste rock pile, possibly jig tails, was noted. The estimated volume of this pile was < 5 cubic yards of material. No streams were flowing in close proximity to the pile.

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.		<u>Yes</u>	No	No	No
2. No uncontained sources with CERCLA-eligible substances are present on site.		<u>Yes</u>	No	No	No
3. There are no on-site, adjacent, or nearby targets.		<u>Yes</u>	No	No	No
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	<u>Yes</u>	No	No	Yes
	Option 2: PA/SI	No	No	Yes	NA
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	<u>Yes</u>	No	No	Yes
	Option 2: PA/SI	No	No	Yes	NA
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.		<u>No</u>	Yes	No	No
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.		<u>No</u>	Yes	No	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: _____
Print Name/Signature
Date

PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION: _____

Limited mining activity appears to have occurred on the subject site. No impacts from the small waste dump was observed. No significant threats to human health and the environment were observed.

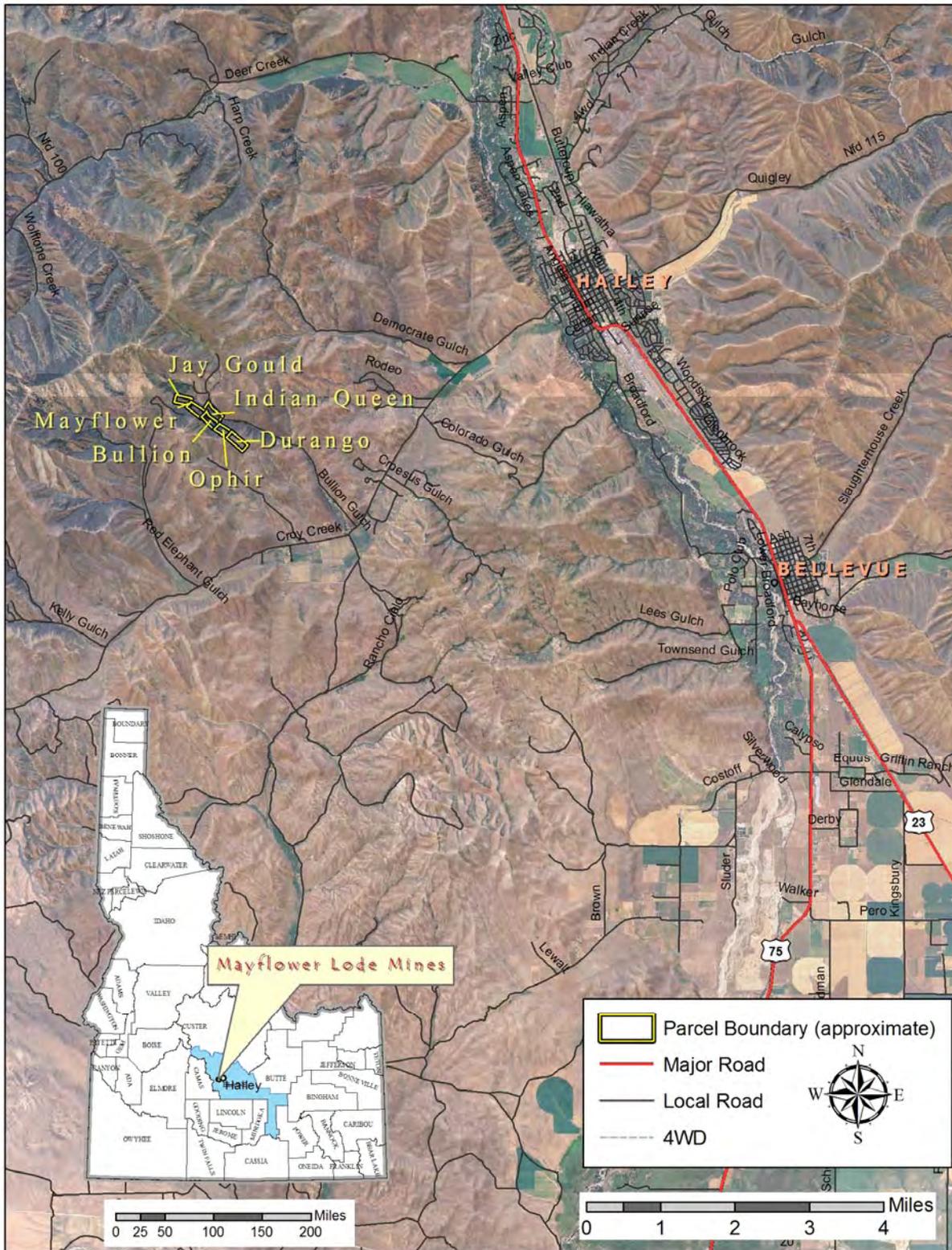


Figure 1. Location of Indian Queen with Blaine County 2009 Parcel Data overlay. (Map source: Blaine County NAIP)

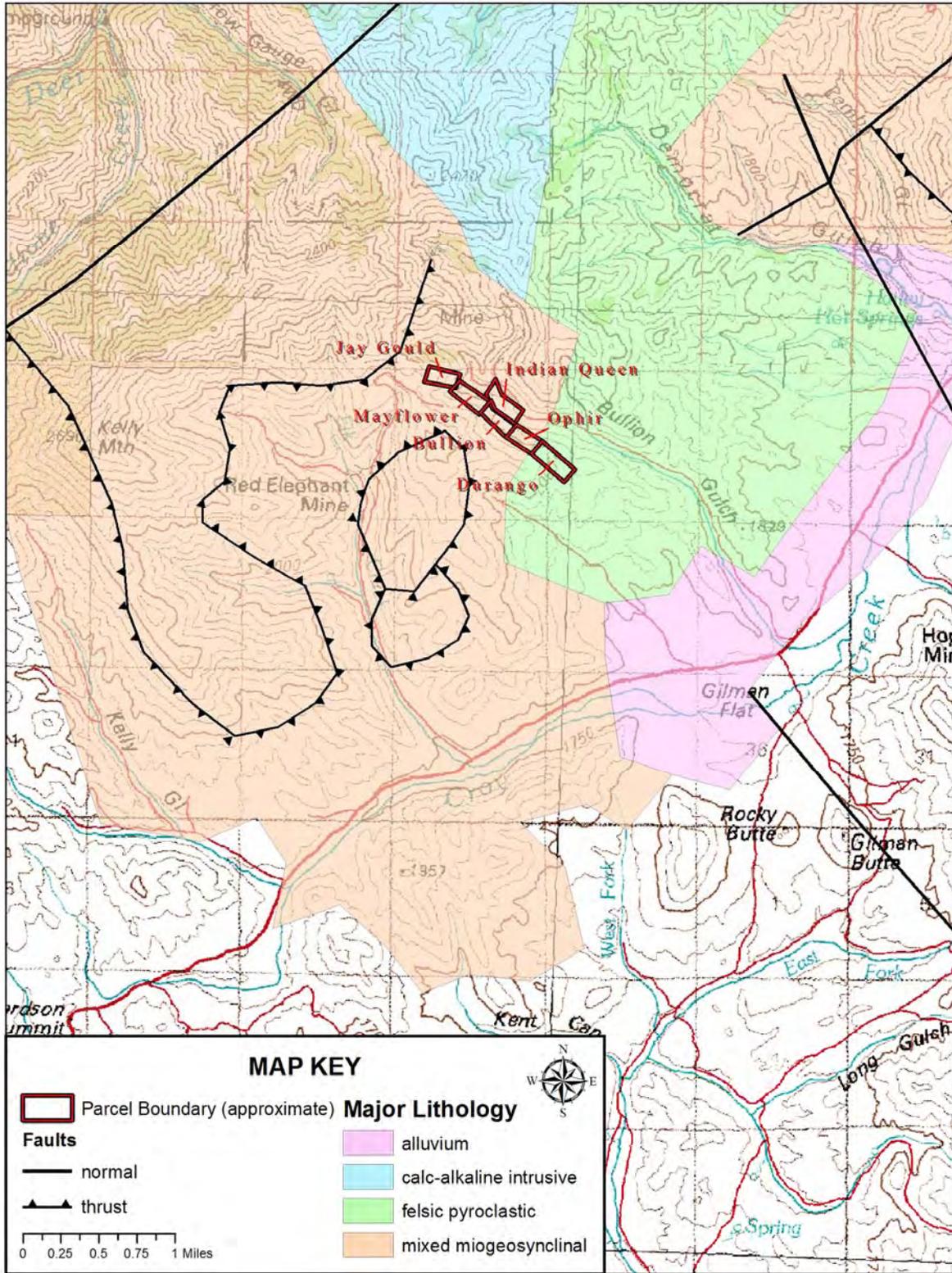


Figure 2. Geology of the Indian Queen. (Map source: USGS 24k)

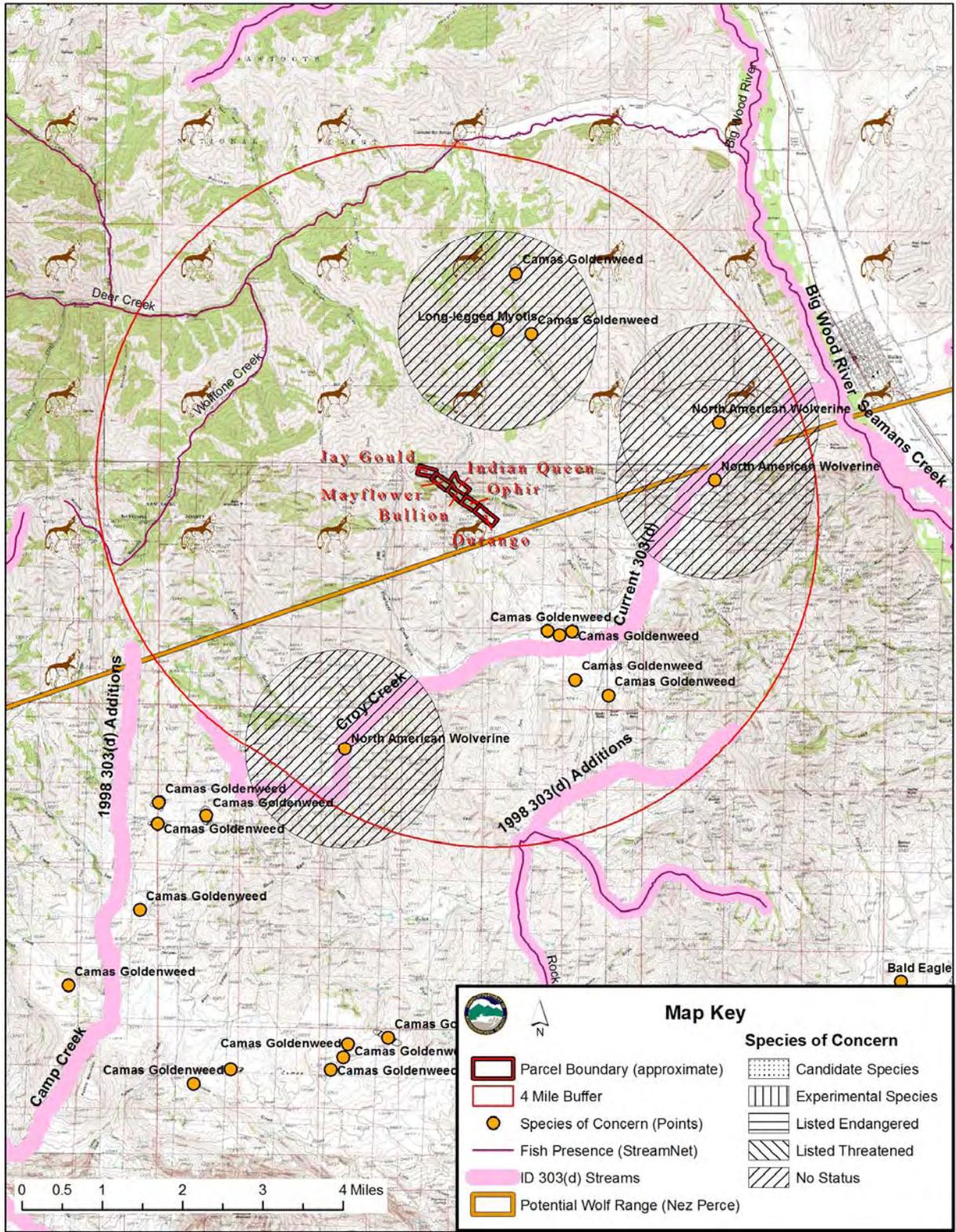


Figure 3. Sensitive species near the Indian Queen. (Map source: Blaine County NAIP)

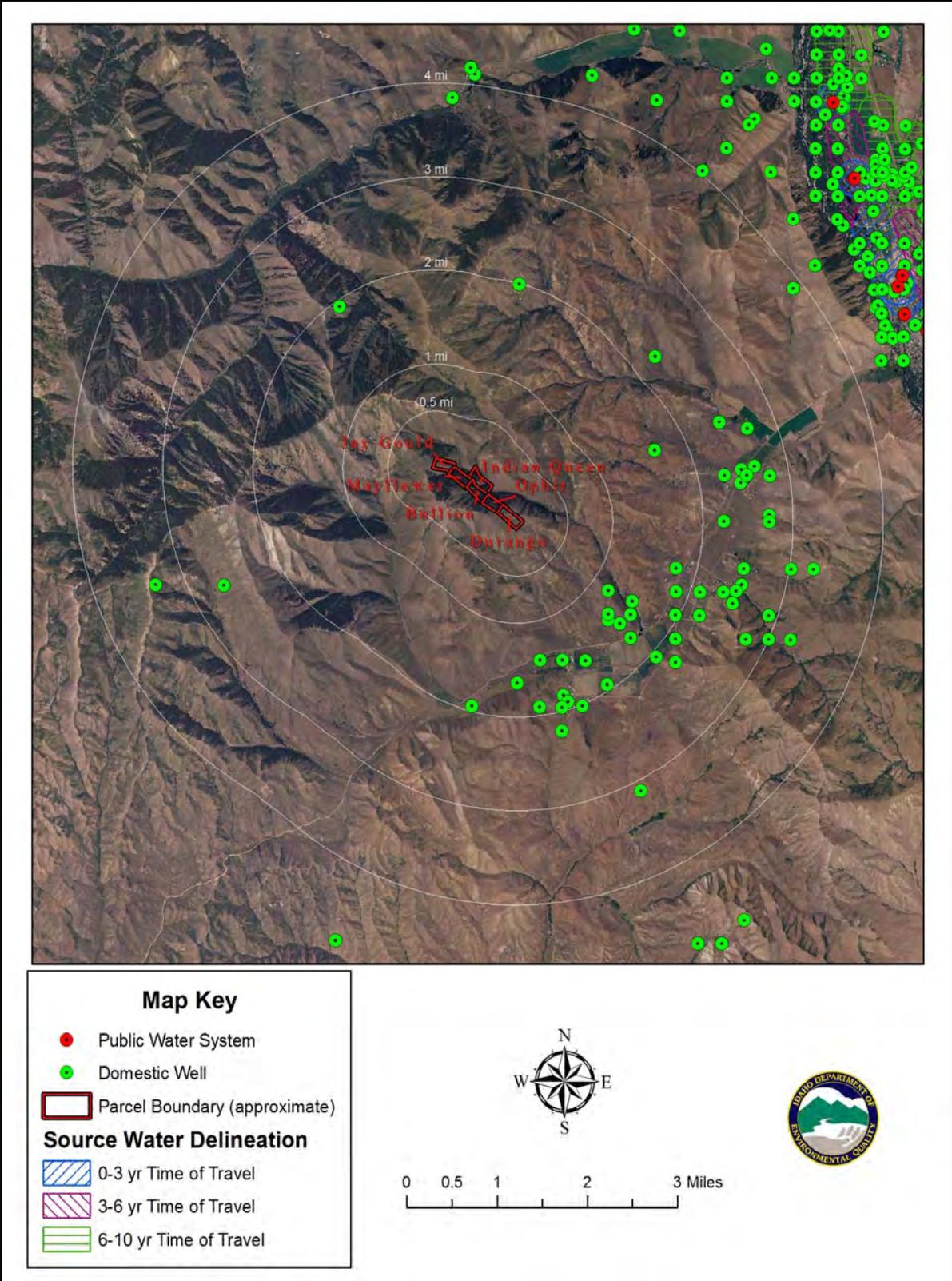


Figure 4. Drinking Water Well locations and source water delineations (Map source: NIAP 2004).

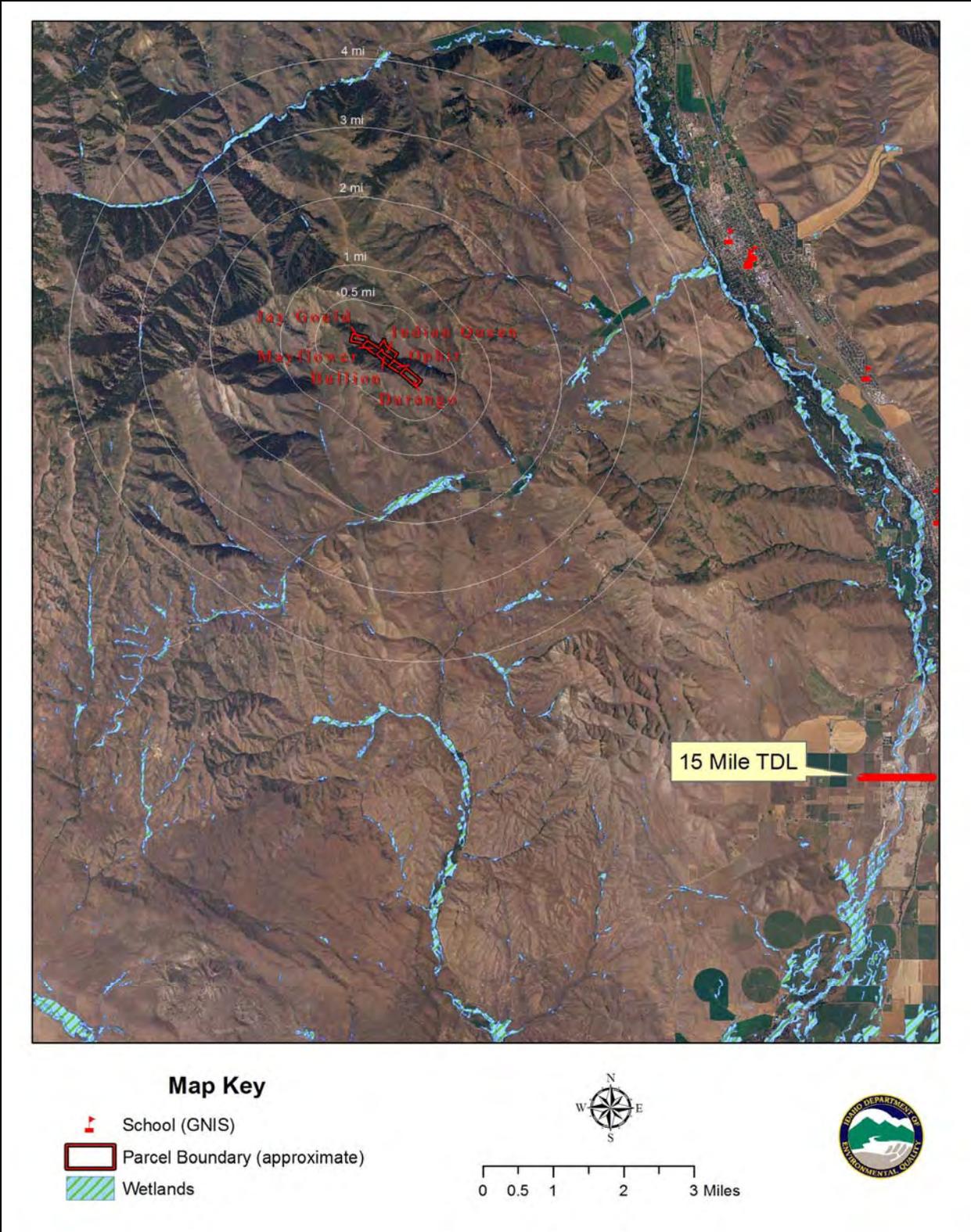


Figure 5. Wetlands and 15-Mile TDL map. (Source Fair 100k, Sunv 100k, NIAP 2004)