



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

*File Copy*

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

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

December 30, 2009

John Ballschmider  
P. O. Box 1710  
Ketchum, ID 83340

RE: Site Assessment of the Richmond Mill & Idahoan Mill  
Parcel No. RP02N170232220

Dear Mr. Ballschmider:

In 2006 the Idaho Department of Environmental Quality (DEQ) and U.S. Environmental Protection Agency collaborated in completion of a watershed assessment for the Croy Creek watershed that culminated in the 2007 Croy Creek Preliminary Assessment/Site Investigation report. However, this report did not fully characterize various mine and mill sites or private properties including the Richmond and Idahoan Mill sites. DEQ has completed those characterizations based on the 2007 report and additional historic and geologic data and made DEQ's determinations as provided in the attached Abbreviated Preliminary Assessment.

No samples were collected at the site during the 2006 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,

A handwritten signature in black ink, appearing to read "Bruce A. Schul".

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

Attachments

cc: Ken Marcie – U.S. Environmental Protection Agency  
Richmond and Idahoan Millsite

# 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 12/18/09  
 (Name/Title) (Date)  
1410 N. Hilton, Boise, ID 83706 (208) 373-0566  
 (Address) (Phone)  
brian.gaber@deq.idaho.gov  
 (E-Mail Address)

**Site Name:** Idahoan Mill & Richmond Mill

**Previous Names (if any):**  
 \_\_\_\_\_

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

Township T2N Range R17E Section 23

**Latitude:** 43.4897 **Longitude:** -114.3917

**Describe the release (or potential release) and its probable nature:** This site was investigated for potential releases of heavy metals from former milling operations.

## 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?		<b>x</b>
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?		<b>x</b>
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)?		<b>x</b>
4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?		<b>x</b>
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)?		<b>x</b>

**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 judgment when evaluating a site. Your judgment 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:

<input checked="" type="checkbox"/>	NFRAP	Refer to Removal Program - further site assessment needed
<input type="checkbox"/>	Higher Priority SI	Refer to Removal Program - NFRAP
<input type="checkbox"/>	Lower Priority SI	Site is being addressed as part of another CERCLIS site
<input type="checkbox"/>	Defer to RCRA Subtitle C	Other: _____
<input type="checkbox"/>	Defer to NRC	

**Regional EPA Reviewer:** \_\_\_\_\_  
Print Name/Signature
Date

**PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION:** \_\_\_\_\_

Little, if any, milling activity appears to have occurred on the subject sites. No impacts were observed. No significant threats to human health and the environment were observed.

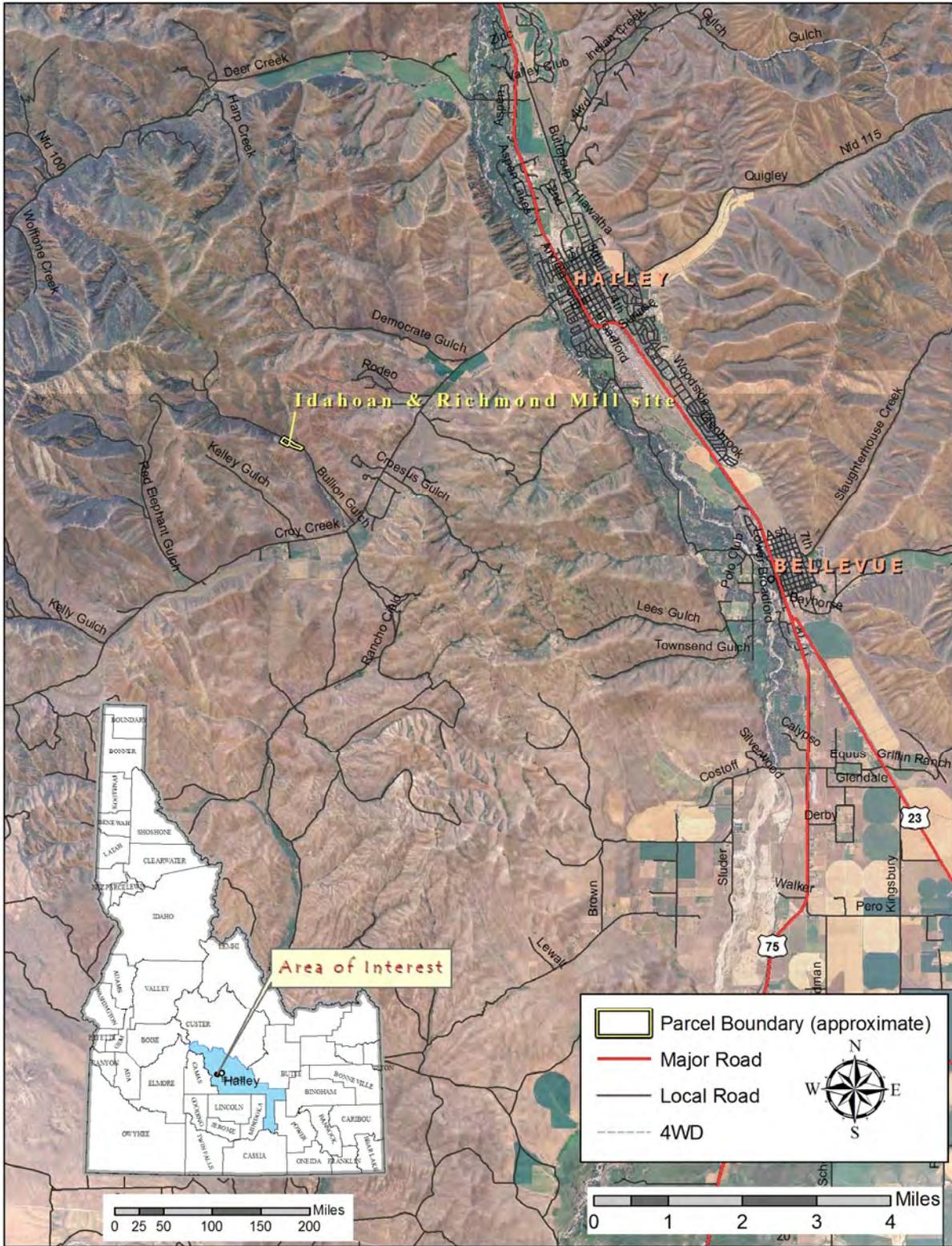


Figure 1. Location of Idahoan Mill & Richmond Mill with Blaine County 2009 Parcel Data overlay. (Map source: Blaine County NAIP)

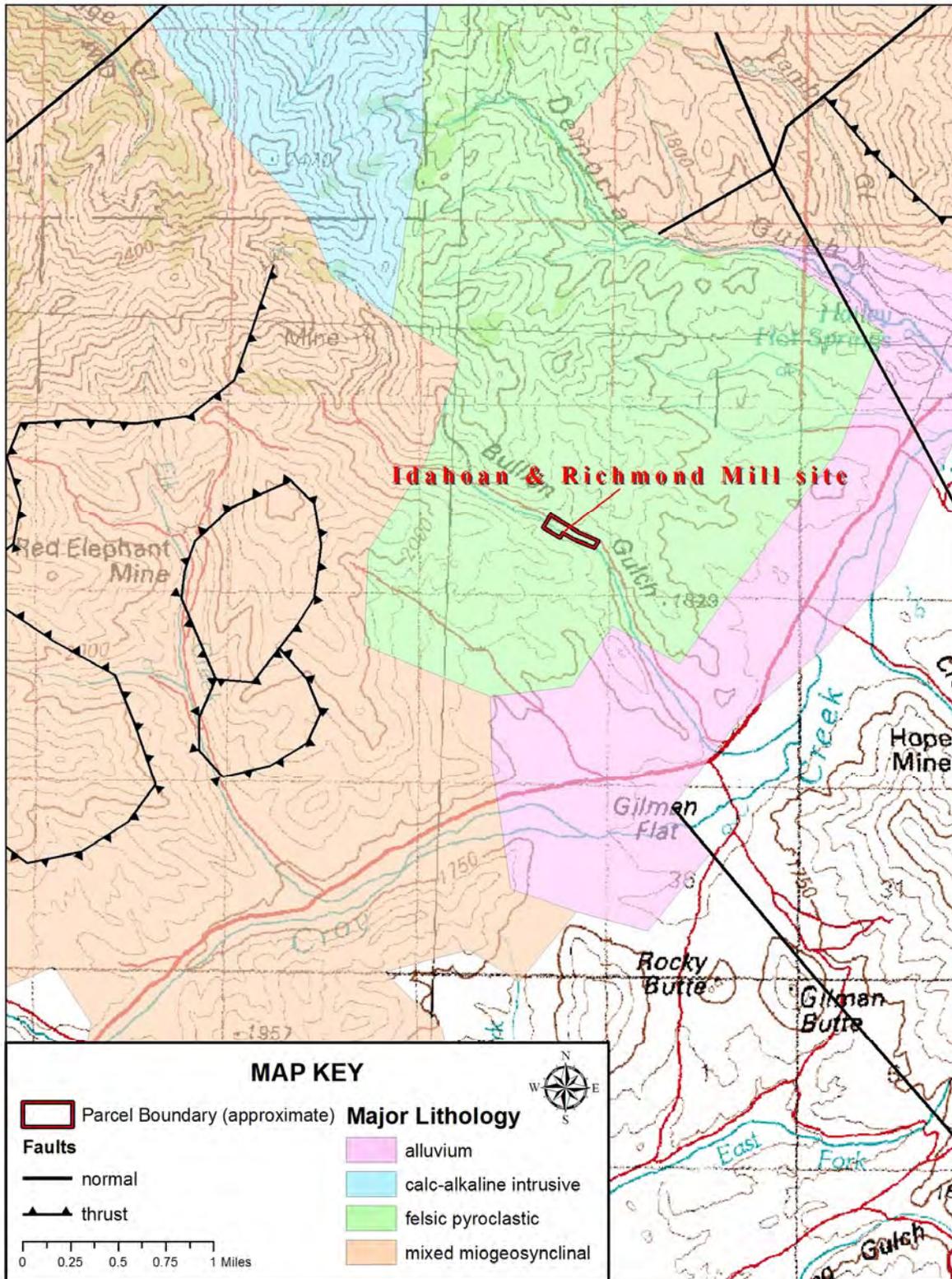


Figure 2. Geology of the Idahoan Mill & Richmond Mill sites. (Map source: USGS 24k)

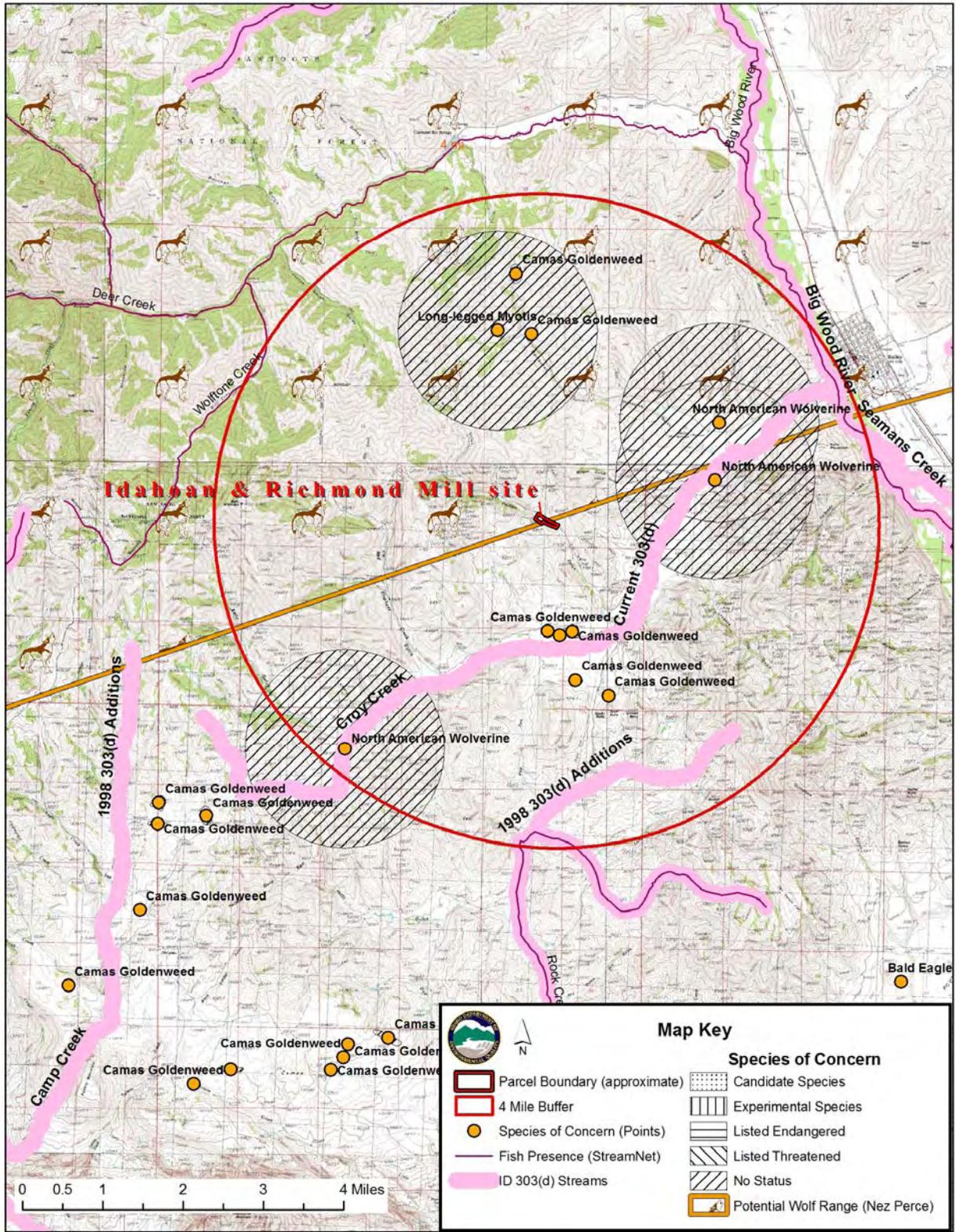
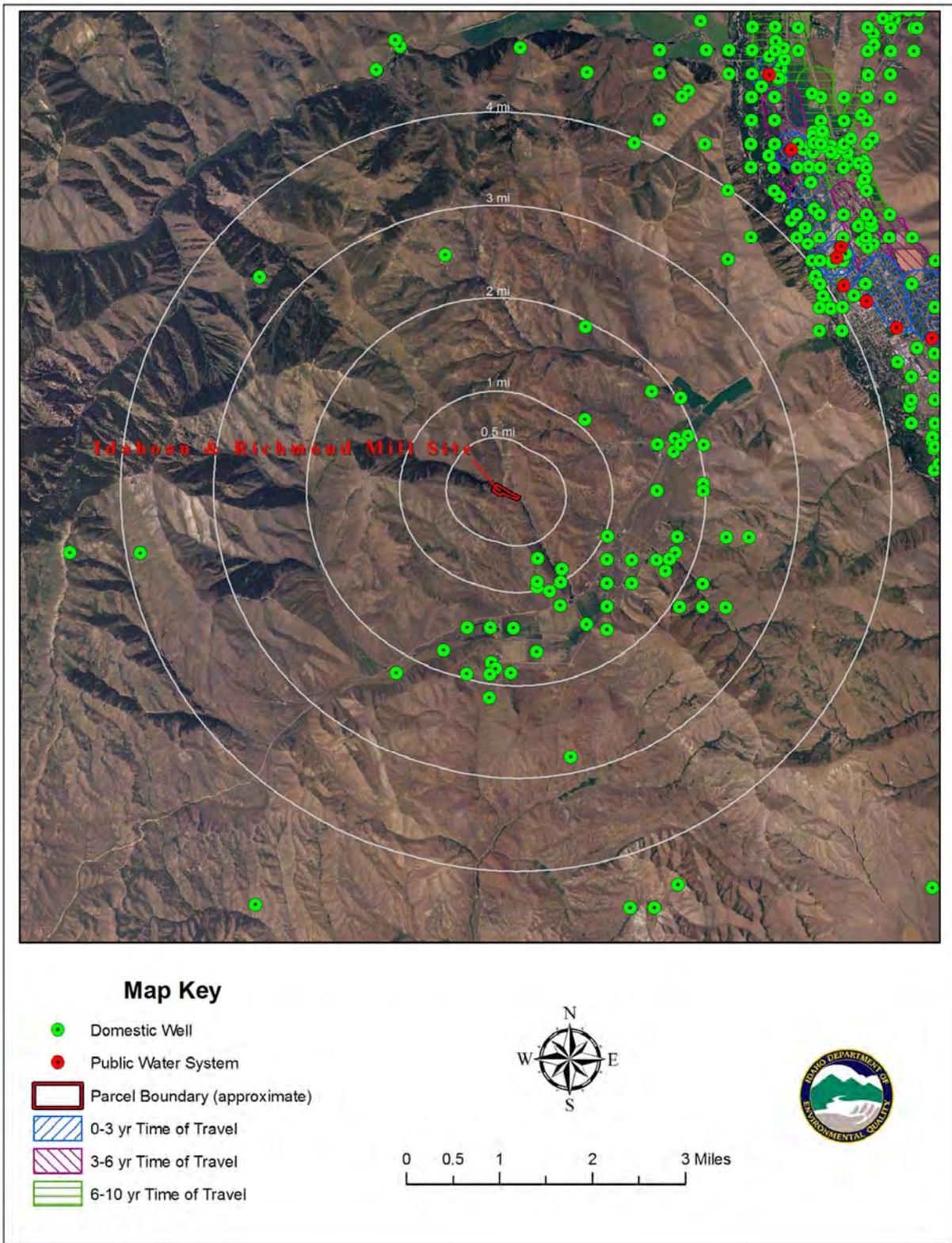


Figure 3. Sensitive species near the Idahoan Mill & Richmond Mill sites. (Map source: Blaine County NAIP)





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

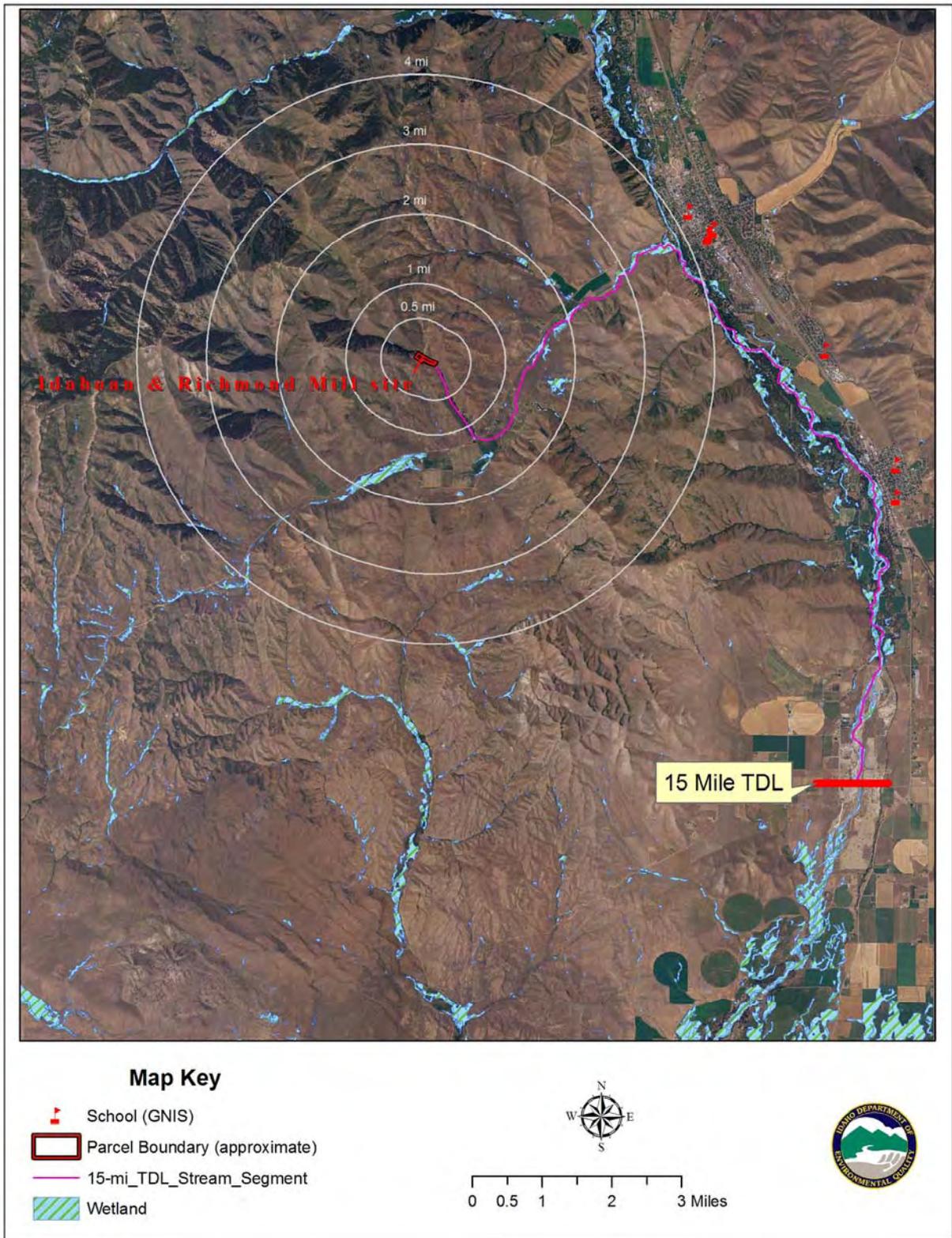


Figure 5. Wetlands and 15-Mile TDL map. (Source Fair 100k, Sunv 100k, NIAP 2004)