



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

December 21, 2011

Campbell Family Trust
c/o Gene and Cathy Halen
P.O. Box 171
Deary, ID 83823

Subject: Site Assessment of the Campbell Mine, Pierce Mining District,
Clearwater County, Idaho

Dear Mr. and Mrs. Halen:

The Idaho Department of Environmental Quality (DEQ) has completed a review of historical mining data and geological information for the above referenced mine, located near Pierce, Idaho. Subsequent to that review, DEQ conducted a site visit of the Campbell Mine.

During the site visit, mining activities such as the two mine pits/closed shaft, placer tailings piles, and remnants of a wooden structure in Silver Creek were observed and mapped in order to provide a comprehensive analysis necessary to complete an Abbreviated Preliminary Assessment (APA).

Preliminary Assessments are conducted by DEQ according to the Federal Comprehensive Environmental Response, Compensation and Liabilities Act (CERCLA). The reasons to complete a Preliminary Assessment (PA) 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).

DEQ 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.

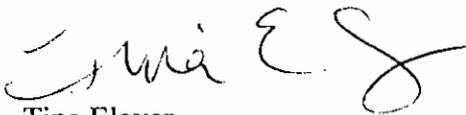
During a DEQ field visit if sources, pathways, and receptors are identified for heavy metal contamination and samples are collected, a PA is generally written. If there is no evidence of receptors being influenced by sources of contamination, as was the case with the Campbell Mine property, then an Abbreviated Preliminary Assessment (APA) is written.

Attached is the Abbreviated Preliminary Assessment for the Campbell Mine. The APA includes limited geological information, photographs, and maps of the property. This information was used by DEQ to make a determination that the property status is No Remedial Action is Planned (NRAP).

DEQ looks forward to addressing any questions you may have regarding our findings. Please contact me (208-373-0563) if you have any comments, questions, or if I may be of any other assistance.

Thank you for giving us permission to access your property; it is truly a very nice location.

Sincerely,



Tina Elayer
Mine Waste Program Specialist
Waste Management and Remediation Division

Attachments

cc: Ken Marcy – U.S. EPA
Daniel Stewart – DEQ Grangeville
~~Campbell Mine File~~

ABBREVIATED PRELIMINARY ASSESSMENT

This is an Abbreviated Preliminary Assessment (APA) for the Campbell Mine near Pierce, 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 Campbell Mine. Additional sheets are attached which contain relevant information including historical information, photographs, maps, and references generated during the site visit or desktop research.

Preparer: Daniel D. Stewart **Date:** 11/8/11
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Site Name: Campbell Mine

Previous Names (aka): Silver Creek Group, Venus Quartz

Site Owner: Campbell Family Trust

Address: c/o Gene and Cathy Halen
P.O. Box 171
Deary, ID 83823

Site Location: 9.8 miles northeast of Pierce, Idaho on Silver Creek.
The Campbell Mine is located on Silver Creek approximately one mile southwest of Oxford Meadows.

Township 38 North, Range 6 East, Section 36

Latitude: 46.59816°N **Longitude:** -115.64566°W

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 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)?		x
4. Are the hazardous substances that may be released from the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?		x
5. Is there sufficient documentation to demonstrate that there is no potential for a release that constitutes risk to human or ecological receptors? <i>(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)?</i>	x	

Please explain all “yes” answer(s):

Research and a site visit confirmed contaminants of concern do not exist in concentrations that present a threat to human health or the environment. No evidence of hazardous substances such as petroleum products or deleterious materials was found.

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?		
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?		
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)?		
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?		

Notes:

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.

Recreational home sites are located within the subject area; however, there are no potential risks to human health or the environment. The mine shaft is closed with no waste dump evident. No airborne, surface water or ground water pathways were observed. See mine history and site conditions and photographs at the end of this report.

Mrs. Cathy Halen contacted DEQ and said they get their potable water from a spring in the draw where they have a 350 gallon tank buried. Mr. Halen adds a little chlorine bleach to the water. They have had it tested and it is fine and no contaminants of concern. DEQ is unsure if this testing involved a total recoverable metals analysis.

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.

Suspected/Documented Site Conditions		APA	Full PA	PA/SI	SI
1. Are releases or potential releases documented at the site?		No			
2. Are uncontained sources with CERCLA-eligible substances documented as being present on the site (i.e., they do exist at site)?		No			
3. Are on-site, adjacent, or nearby receptors present?		Yes			
4. Is there 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)?	Option 1: APA	No			
5. Is there documentation that a sensitive receptor has been exposed to a hazardous substance released from the site?	Option 2: Full PA or PA/SI	No			
6. Is there an apparent release at the site with no documentation of targets, or is there targets on site or immediately adjacent to the site?	Option 1: APA SI	No			
	Option 2: PA/SI	No			
7. Is there 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			
8. Is there 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			

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 "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:

<input checked="" type="checkbox"/>	No Remedial Action Planned (NRAP)		Defer to NRC
	Higher Priority SI		Refer to Removal Program
	Lower Priority SI		Site is being addressed as part of another CERCLIS site
	Defer to RCRA Subtitle C		Other:

DEQ Reviewer:


Daniel D. Stewart

12/20/11
Date

Please Explain the Rationale for Your Decision:

Research and the site visit confirmed sources of contaminants of concern do not exist that present a threat to human or ecological receptors. In addition evidence of uncontrolled hazardous substances such as petroleum products or deleterious materials were not found.

This site contains no significant disturbance due to mineral extraction or processing. Little evidence of tailings or waste piles remains. Previously disturbed areas are now vegetated and stable.

Recreational activity is restricted primarily to summer/seasonal use. Due to snow, access may not be available until June. No significant sources, pathways, or locations of exposure are present.

Although there is no reason to believe any issues exist with their drinking water, the Halen family may want to have their drinking water source analyzed for total recoverable metals.

As a result of our research and observations, DEQ is recommending this site be designated as NRAP.

Attachments:

- Historical Information
- Site Conditions and Photographs
- Maps
- References

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Historical Information

Mine History: Although certainly in the immediate vicinity, the following historical information from *Some Central Idaho Gold Districts* (Jellum 1909) may not be specific to the Campbell Mine.

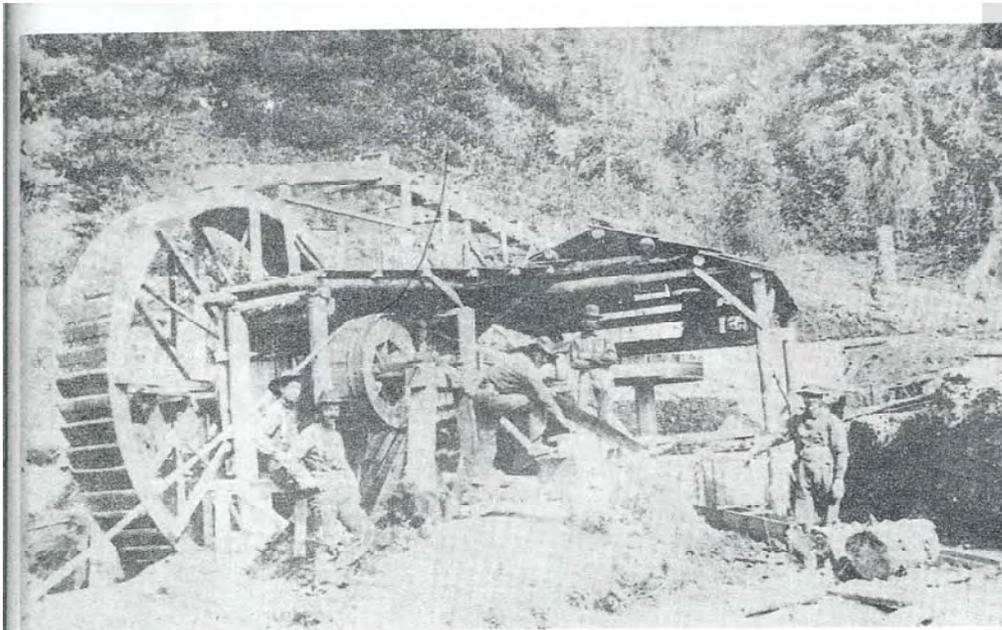
Silver Creek: This group of claims, located a short distance southeast of Oxford, is owned by Eskelon and Anderson, and is under bond to Spokane people. Several hundred feet of drifting has been done on a large quart-filled vein carrying considerable free gold and a friable, porous sulphide. This vein will average at least 20 feet in width and is continuous for 4000 feet. The owners have operated an arrastra on the property with very good results.

In the immediate vicinity are properties owned by I.D. Cleek, Chas. Green and Fitz Bros., all of which carry large well defined veins showing good average values.

The information below is from personal communication with Mrs. Cathy Halen (2011):

The Campbell Mine was in operation during the late 1930's and into the 1940's. The property remains in the Campbell Family Trust. I'm the granddaughter of Edward A. Campbell. He and my father Frank A. Campbell were the owners and operators of the mine. They are both deceased. All the mine buildings have been removed, the mine shaft has been closed for many years. Silver Creek flows through the property. It is very clean and clear.

In the 1980's the JR. Simplot Company did some core drilling and sampling on our property. They have since signed off the mining leases.



Arrastre for crushing ore; on Silver Creek near Pierce (Idaho Historical Society Photo)

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Site Conditions and Photographs

The Campbell Mine is located on Silver Creek approximately one mile southwest of Oxford Meadows. All of the photographs in this section were taken by DEQ on June 29, 2011.



Photo 1. Campbell camp site.



Photo 2. Campers, fifth wheel trailers, and house trailers under snow sheds.

Although there is little mining development at the Campbell Mine, a recreational home site area has been developed for part-time/seasonal residents of campers, fifth wheel trailers, and house trailers under snow sheds. The owners were supposed to join DEQ on the site visit, but were unavailable due to a family emergency.



Photo 3. Trailer homes at Campbell Mine camp site.



Photo 4. Aesthetic drain ditch at Campbell Camp site.

It was obvious that, although some recreational or very low volume mining has occurred at the site recently, most mine development and production occurred decades ago and have been overshadowed by re-colonization of native vegetation and recreational home developments.



Photo 5. Historic placer piles at Campbell Mine downstream of the home sites along Silver Creek.

Only a couple hundred yards of placer tailings (gravels) were visible from the Silver Creek Road (private) although the morphology of the channel and surrounding ground suggests there may have been a lot more.



Photo 6. Campbell Mine equipment yard.



Photo 7. Campbell Mine equipment shed.

The Campbell Mine has a small bench or staging area with some equipment including a 12 yard dump truck, bull dozer, and equipment shed. Although the equipment and materials do not appear to have been used for some time, there was no evidence of petrochemical spills, hazardous waste, or other issues here.



Photo 8. Campbell Mine Pit above camp on east side of creek. No pathways to Silver Creek are evident. Latitude 46.59275°N, Longitude -115.65160°W



Photo 9. Campbell Mine Pit above camp and on the other side of the access road away from Silver Creek.



Photo 10. Upper Campbell Mine Pit on west side of creek (across creek). No pathways to Silver Creek are evident.
Latitude 46.59349°N, Longitude -115.6522°W

There are two very small pits located at the Campbell Mine neither of which exceeds a 1,000 yards of production. Neither has a significant waste dump adjoining them. There are no indications of major erosional features or delivery of mine waste to the nearby Silver Creek. Most of the ore may have been removed for processing offsite. According to personal communication with Mrs. Cathy Halen, a shaft was on site but has been closed for many years.



Photo 11. Campbell Mine; remnants of wooden dam or possibly of the Silver Creek arrastra.



Photo 12. Campbell Mine Dam remnants or possibly of the Silver Creek arrastra.

From an historical perspective, the site may have significant interesting characteristics. While examining the stream channel for influences by or releases from the mine areas, DEQ located the remnants of a timbered dam. This is located above the mine site(s) on Silver Creek and most likely provided the hydraulics for placer operations below. On a personal note, the Campbell Family Trust property (Campbell Mine Site) is a very beautiful spot, extremely well maintained, and kept up.

Maps

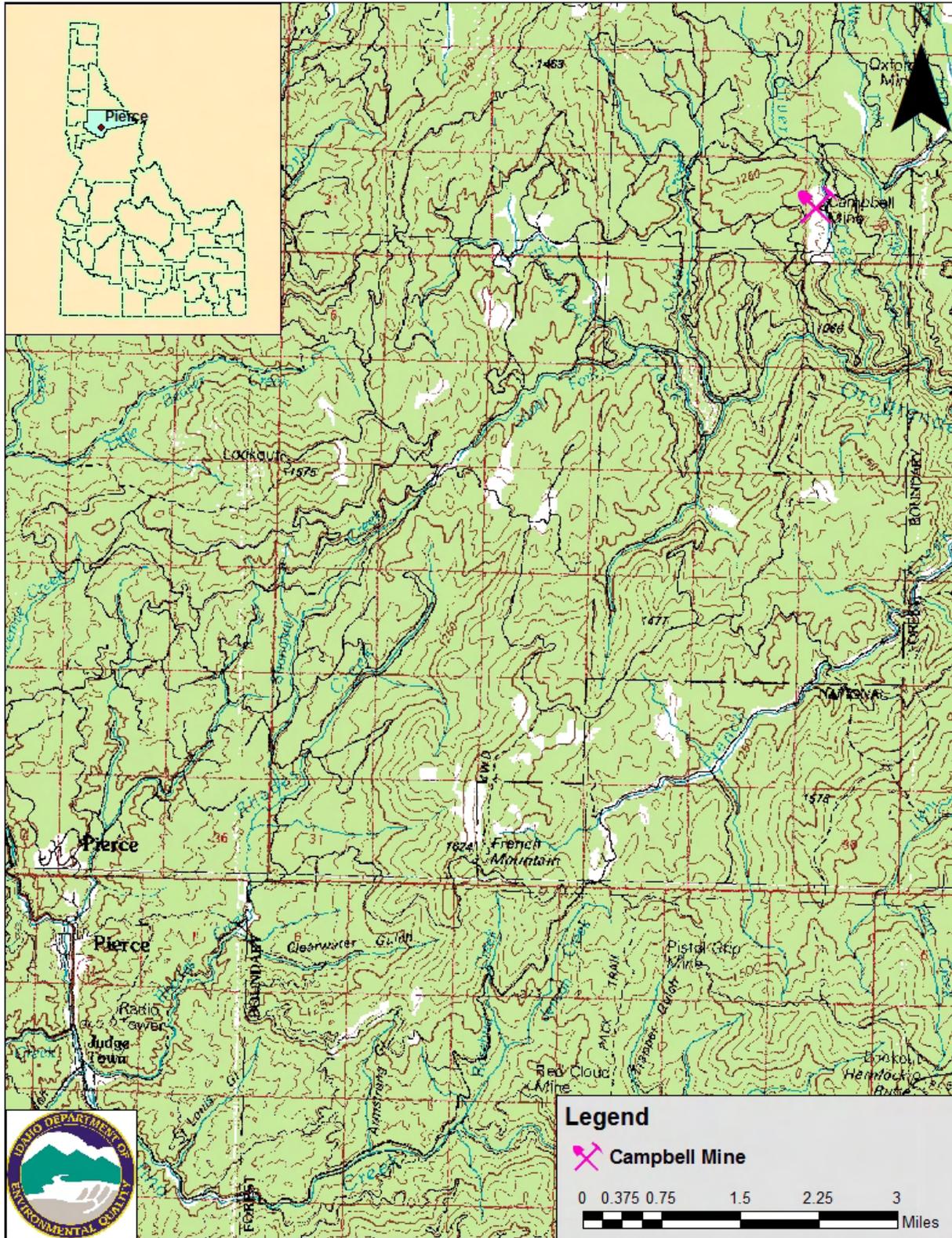


Figure 1. Location of the Campbell Mine in Clearwater County, Idaho
(Map Source: USGS 100k Quads)

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Figure 2. Major Lithology of the Campbell Mine and Surrounding Area
 (Map Sources: SDE Feature Class, USGS 1995; Idaho DEQ GIS ArcSDE 9.2 Geodatabase)

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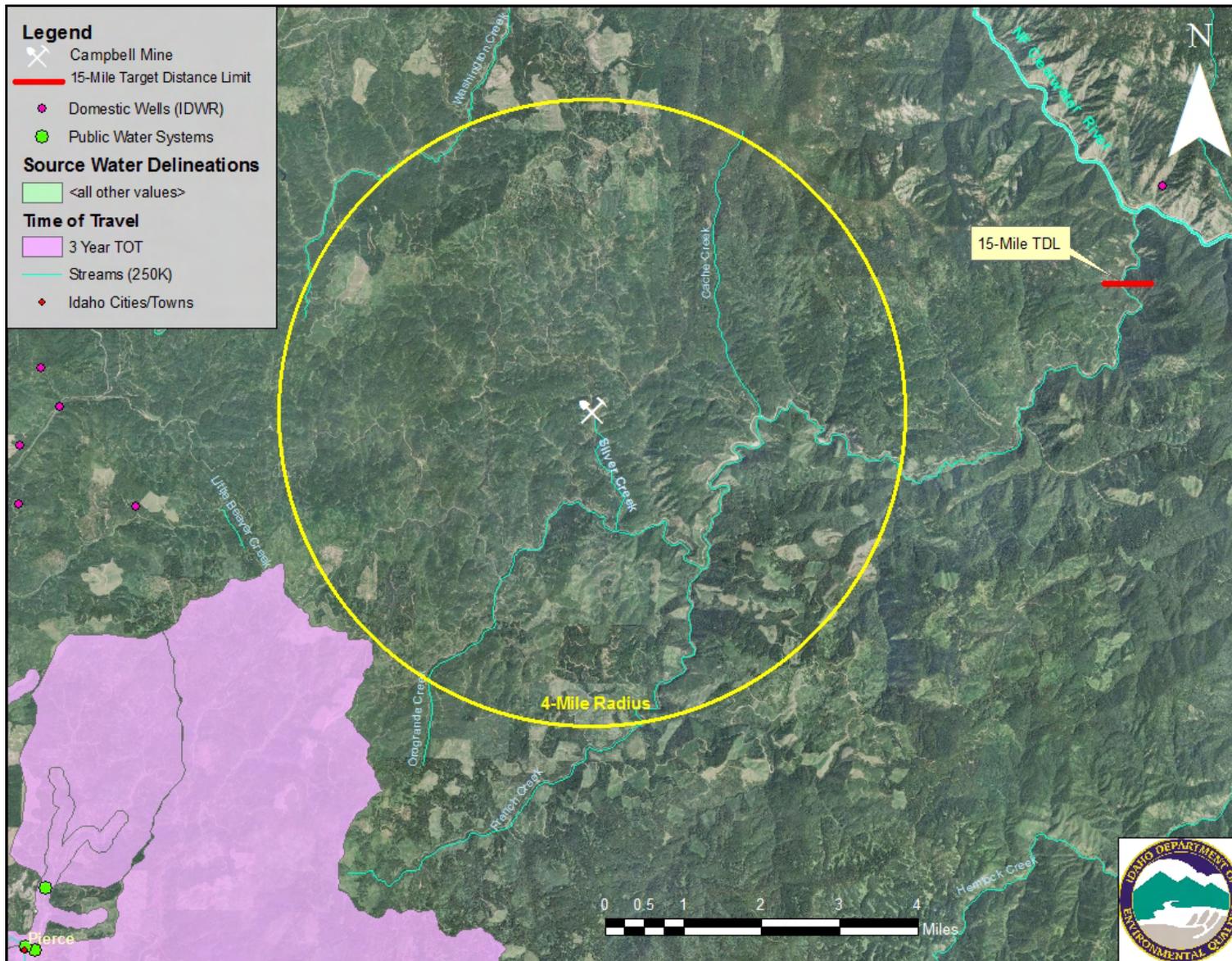


Figure 3. There are no domestic well locations or Public Water Systems within the four mile radius, 15 mile target distance limit (TDL). There are no significant wetlands within a two mile radius or in the general area. (Map Source: 2004 National Agriculture Imagery Program (NAIP))

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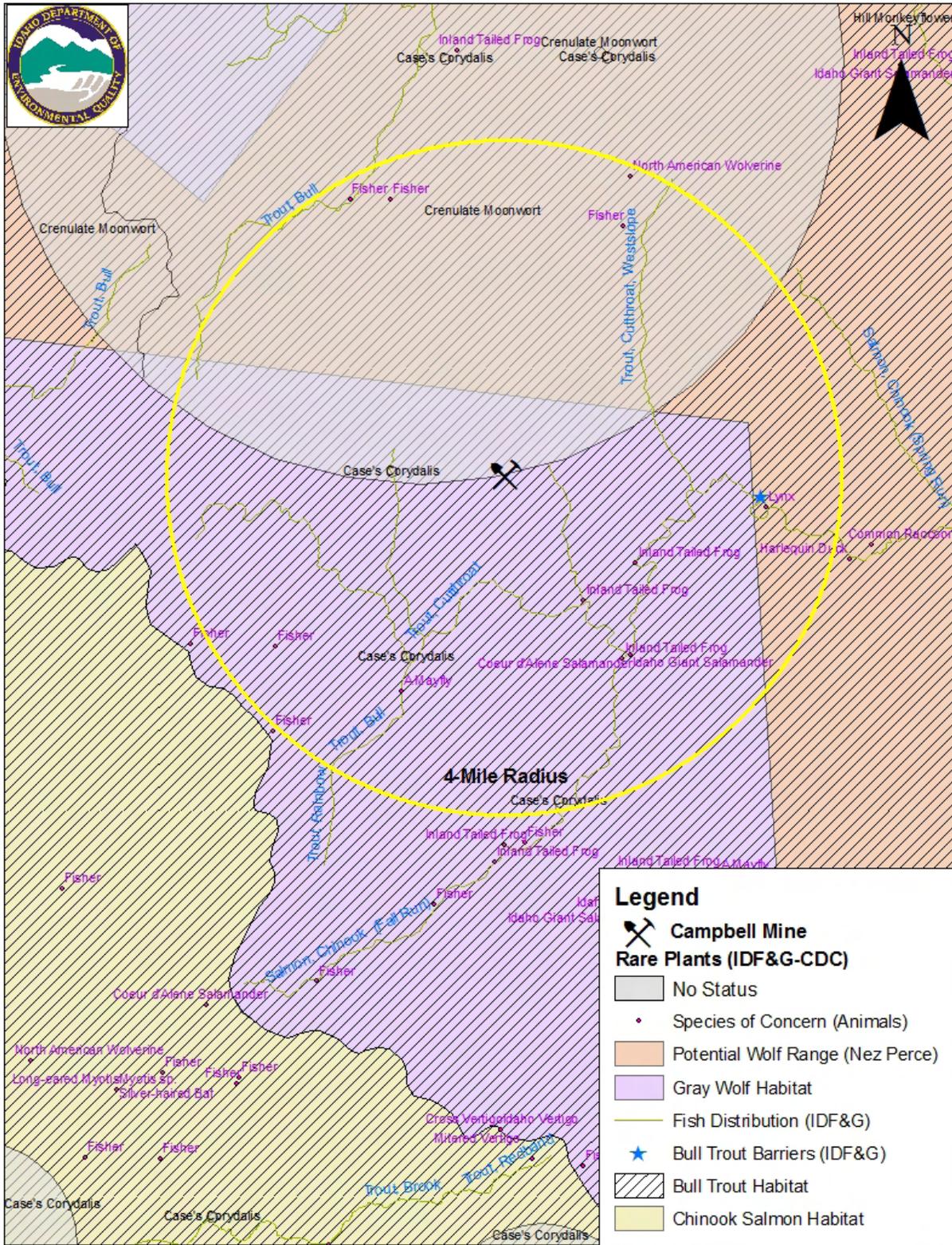


Figure 4. Sensitive species within four mile radius and surrounding area. Species of Concern: Non-Game Animals and Plants. Fisheries within four mile radius and surrounding area. (Map Source: SDE Feature Dataset, Animal Conservation Database. Idaho DEQ GIS ArcSDE 9.2 Geodatabase)

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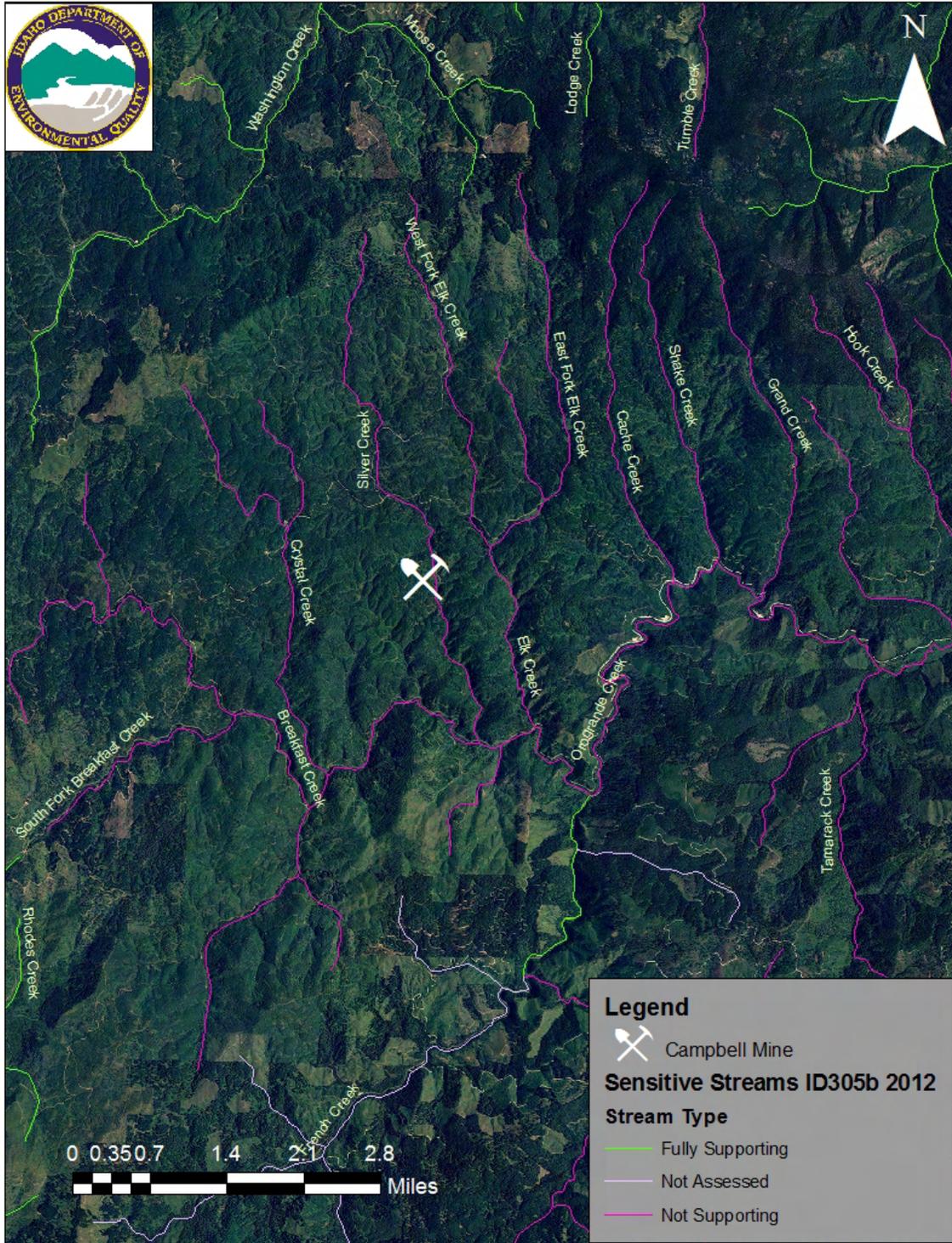


Figure 5. Sensitive Streams Located in the Vicinity of the Campbell Mine.
 (Map Source: IDEQ.GIS.ArcSDE 9.3 Geodatabase, NAIP 2004).

Silver Creek (Water body ID 17060307CL006_02) and Orogrande Creek (Water body ID17060307CL006_03) are listed on the State of Idaho 303(d) list for impaired waters. They are listed as not supporting salmonid spawning due to temperature. The Clean Water Act (CWA) requires the state to prepare a report, listing (a) the current conditions of all state waters and (b) those waters that are impaired and needing a TMDL (total maximum daily load). The first list is called the 305(b) list and the second is called the 303(d) list. Both lists are named in accordance with the sections of the CWA where they are defined; together they are known as the Integrated Report. Although they are maintained as separate lists and presented separately in the Integrated Report, impaired waters are just some of the state’s waters, so water on the 303(d) list is actually a subset of those on the 305(b) list.

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References

Jellum, S.P. 1909. Some Central Idaho Gold Districts. Northwest Mining News, Spokane, Washington. pp. 26-27.

Halen, Cathy. 2011. Personal Communications.