STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

September 19, 2011

Mr. Rick Wasem
1750 Cherry Street
Clarkston, WA 99403

Subject: Site Assessment of the Virginia Placers 1 and 2 and/or Yellow Bar Placer

Dear Mr. Wasem:

The Idaho Department of Environmental Quality (DEQ) has completed a review of historical mining data and geological information of the above referenced claim. Subsequent to that review, DEQ conducted a site visit of the Virginia Placers 1 and 2/Yellow Bar Placer.

During the June 29, 2011 site visit no waste dumps, adits or discharges were observed. As per our discussion with you on site, Louie Turcott used a drag line in the 1950's to excavate and process the gravels in Orogrande Creek. The area has been disturbed but is well stabilized with lush vegetation and a beaver dam complex.

Preliminary Assessments (PAs) are conducted by DEQ 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).

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.

No sediment or water samples were collected during the site visit. DEQ offers no site specific human health or safety recommendations. The placered area is well vegetated and stabilized although numerous dredge piles remain.

Attached is an Abbreviated Preliminary Assessment for the Virginia Placers 1 and 2/Yellow Bar Placer. It contains limited geological information, photographs, and maps of the property. This information was used by DEQ to make a determination that the property status is NRAP.

DEQ looks forward to addressing any questions you may have regarding our findings, or providing additional assistance to you as your mining plans progress at the property. Please contact me (208-373-0554) or Daniel Stewart (208-983-0808) if you have any comments, questions, or if I may be of any other assistance. Lastly, thank you very much for allowing us access to your property and joining us during our review.

Sincerely,

Bruce A. Schuld
Mine Waste Programs Coordinator

Attachments

cc: Ken Marcy – U.S. EPA
Daniel Stewart – DEQ Grangeville
Virginia Placers 1 & 2 File

ABBREVIATED PRELIMINARY ASSESSMENT

This is an Abbreviated Preliminary Assessment (APA) the Virginia Placers 1 & 2 near Pierce, Idaho. This document provides the rationale for the determination of No Remedial Action Planned (NRAP) or if additional analysis or site investigation is necessary for the Virginia Placers 1 & 2. Additional sheets are attached which contain relevant information including photo logs and maps generated during the site visits or desktop research.

Preparer: Bruce A. Schuld **Date:** 9/6/11
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706
(208) 373-0554
bruce.schuld@deq.idaho.gov

Site Name: Virginia Placers 1 & 2

Previous Names (aka): Yellow Bar Placer

Site Owner: Rick Wasem

Address: 1750 Cherry Street
Clarkston, WA 99403

Site Location: 7 miles northeast of Pierce, Idaho on Orogrande Creek

Township 37 North, Range 6 East, Sections 2 and 11

Latitude: 46.57083^{o}N **Longitude:** -115.66250^{o}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? (*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):

Research and site visit confirmed contaminants of concern do not exist in concentrations that present a threat to human health or the environment.

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 one 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:

Recreational home sites are located within the subject area; however, there are not potential risks to human health or the environment. Very little mining activities occurred in this area and no waste dumps, adits, or discharges were observed. (See site photographs and site conditions at the end of 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. **(Circle or highlight responses)**

Suspected/Documented Site Conditions		APA	Full PA	PA/SI	SI
1. Releases or potential to release are not documented at the site.		Yes			
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			
3. On-site, adjacent, or nearby receptors are not present.		Yes			
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)	Option 1: APA	No			
5. There is 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. 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	No			
	Option 2: PA/SI	No			
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			
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			

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:

x	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: Bruce A Schuld 9-12-11

Bruce A. Schuld Date

Please Explain the Rationale for Your Decision:

This site contains no significant disturbance due to mineral extraction or processing, and although it is close to recreational development, no significant sources, pathways, or locations of exposure are present.

Attachments:

Site Photographs and Site Conditions
Maps

Site Photographs and Site Conditions

Preliminary Assessment
Yellow Bar Placer
June 29, 2011

DEQ performed the site visit for a preliminary assessment on June 29, 2011 with the property owner Mr. Rick Wasem. The site known as the Yellow Bar Placer is also known as the Virginia Placers 1 and 2. The claims were patented by Louie Turcott in the 1950's, who used a drag line to excavate and process the gravels in Orogrande Creek. Although the history of the site is unclear, supposedly Chinese miners had worked the property shortly after or coincidental to the Pierce Gold Rush in the 1860's. The claims cover approximately 40 acres of lushly vegetated wetlands, and a small upland area where the historic buildings, including a recreational cabin, are located.

Currently the site is being used for recreational housing as a base for hunting, fishing, and ATV travel. The buildings have been cleaned up and sanitized for this purpose. There are no indications of storage use or disposal of hazardous or deleterious materials, including mine wastes, anywhere on the site.

In the future, Mr. Wasem wants to undertake some stream channel rehabilitation that enhances the wetlands and riparian values of the property. Mr. Wasem also indicated that he would likely pursue some limited (recreational) dredge and placer mining at the site.

There are currently limited drinking/potable water supplies from a localized "spring box" above the mine site and buildings.

Photo 1. Daniel Stewart (DEQ) and Mr. Wasem in front of the primary dwelling. (Photo by B. Schuld 6/29/11)

Photo 2. Primary recreation residence and fire ring
(Photo by B. Schuld 6/29/11)

Photo 3. Utility shed at Yellow Bar Placer. (Photo by
B. Schuld 6/29/11)

Photo 4. Orogrande Creek Road through center of Yellow Bar Placer. (Photo by B. Schuld 6/29/11)

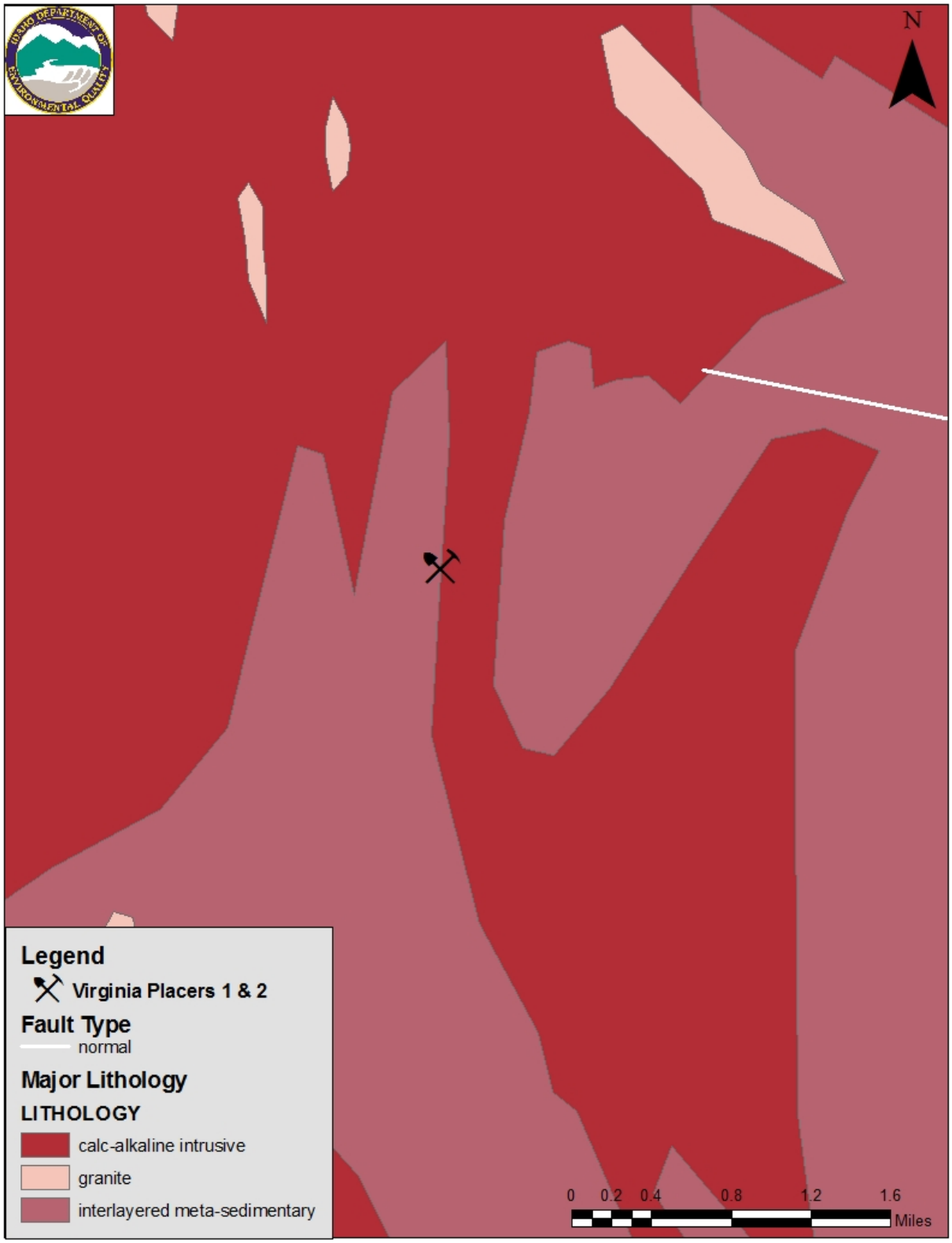
The main County/Forest Service improved road along Orogrande Creek traverses the north-south axis of the Yellow Bar Placer claims.

Photo 5. The lower Yellow Bar Placer claims is dominated by riparian and wetland habitats on Orogrande Creek. (Photo by B. Schuld 6/29/11)

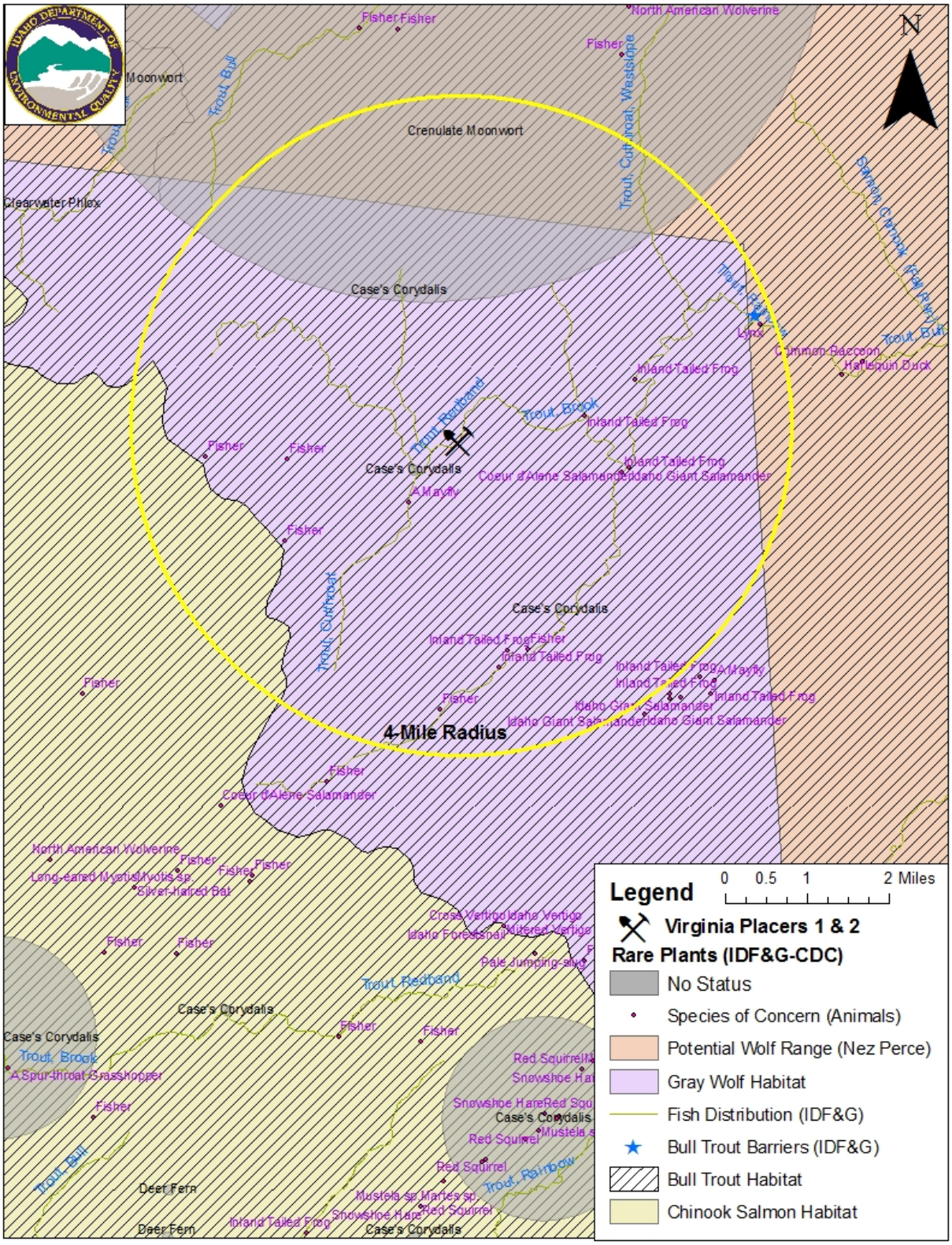
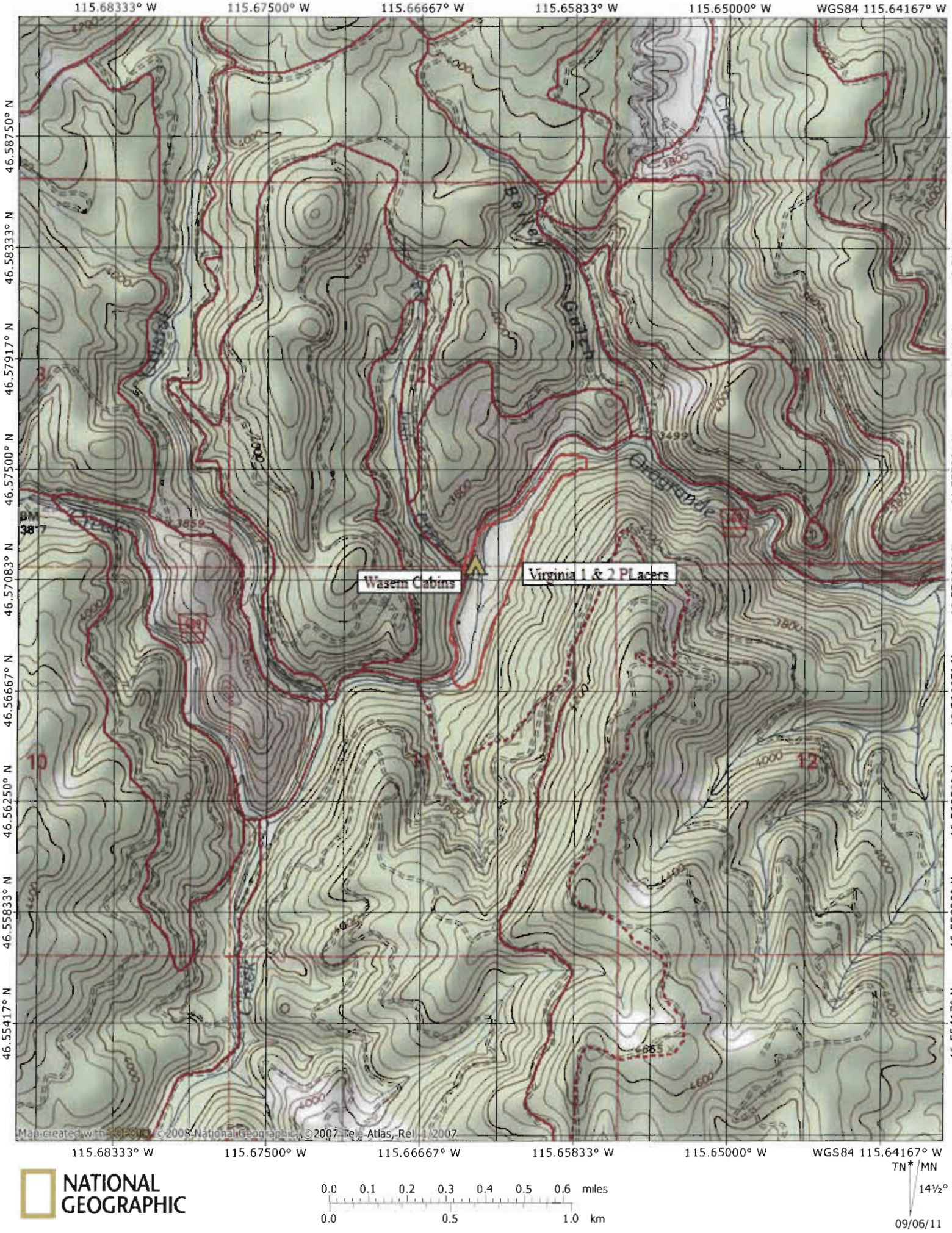
Photo 6. Orogrande Creek has numerous natural (beaver) and anthropogenic obstructions on the Yellow Bar Placer. (Photo by B. Schuld 6/29/11)

Most of the riparian and wetlands habitat on the claims appears to be of high quality and relatively unaffected by past mining practices even though it is obvious the terrain has been altered.

Maps


N
Legend
Virginia Placers 1 & 2
Fault Type
normal
Major Lithology
LITHOLOGY
calc-alkaline intrusive
granite
interlayered meta-sedimentary
0 0.2 0.4 0.8 1.2 1.6
Miles

46.57222, -115.66232
Image USDA Farm Service Agency
© 2011 Google
Google
Imagery Date: 6/23/2009
46°34'15.76" N 115°39'48.74" W elev 3522 ft
Eye alt 7024 ft


N
Moonwort
Crenulate Moonwort
Clearwater Phlox
Case's Corydalis
Fisher
North American Wolverine
Trout, Bull
Trout, Cutthroat, Westslope
Trout, Redband
Trout, Brook
Trout, Rainbow
Lynx
Common Raccoon
Harlequin Duck
Inland Tailed Frog
Coeur d'Alene Salamander
Idaho Giant Salamander
A Mayfly
Long-eared Myotis/Yuma Myotis sp.
Silver-haired Bat
Cross Vertigo
Idaho Vertigo
Idaho Forestsnail
Pale Jumping-slug
A Spur-throat Grasshopper
Red Squirrel
Snowshoe Hare
Mustela sp.
Martes sp.
Deer Fern
4-Mile Radius
Legend
0 0.5 1 2 Miles
Virginia Placers 1 & 2
Rare Plants (IDF&G-CDC)
No Status
Species of Concern (Animals)
Potential Wolf Range (Nez Perce)
Gray Wolf Habitat
Fish Distribution (IDF&G)
Bull Trout Barriers (IDF&G)
Bull Trout Habitat
Chinook Salmon Habitat

TOPO! map printed on 09/06/11 from "Virginia 1 2 PlacersUntitled3.tpo"