



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

October 26, 2010

Mr. Thad Gerheim  
H663 Box 1598  
Challis, ID 83226

RE: Abbreviated Preliminary Assessment Report and Recommendations for Determination  
for the Shiloh and Shamrock patented mining claims.

Dear Mr. Gerhiem:

The Idaho Department of Environmental Quality (DEQ) has completed the attached Abbreviated Preliminary Assessment (APA) on the Shiloh and Shamrock patented mining claims. These mine claims have been subdivided into two separate parcels which now have residential uses. The properties are currently owned by you and Mrs. Bardsley as identified in the report.

Although there is the potential to have two or more residences and sensitive receptors on the properties, there was no evidence of hazardous materials of waste observed at the properties, nor is there the potential of any having been there. As a result of our observations, DEQ is recommending this site be designated as "No Remedial Action Planned" (NRAP).

The APA will be entered in DEQ's Waste Division Inventory database. A link to the APA can also be found on DEQ's Preliminary Assessment Web page at:

[http://www.deq.idaho.gov/waste/prog\\_issues/mining/pa\\_program.cfm](http://www.deq.idaho.gov/waste/prog_issues/mining/pa_program.cfm)

If you have any questions about these sites, reports, or DEQ's recommendations, please do not hesitate to call me at 208-373-0554.

Respectfully,

A handwritten signature in black ink that reads "Bruce A. Schuld".

Bruce A. Schuld  
Mine Waste Projects Coordinator

attachments

cc: Ken Marcy, USEPA  
PA Program file

## ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist is used to help site investigators 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, and attach all relevant information including photo logs, historical data, or maps generated during site visits or desk top research.

**Checklist Preparer:** Bruce A. Schuld **Date:** 10/19/2010  
Mine Waste Program Coordinator  
Idaho Department of Environmental Quality  
1410 N. Hilton, Boise, ID 83706  
(208) 373-0554  
bruce.schuld@deq.idaho.gov

**Site Name:** Shiloh and Shamrock Consolidated Lodes

**Previous Names (if any):** aka NA

**Site Owners (subdivided claims):** Thad Gerheim and Nancy Bardsley

**Address:** Thad Gerheim  
H663 Box 1598  
Challis, ID 83226

Nancy Bardsley  
1154 Camps Canyon Road  
Troy, ID 83871

**Site Location (closest town):** 2.5 miles East of Troy, Idaho 83871

**Township** 39 North **Range** 3 West **Section** 15  
**Latitude:** N 46.72766° **Longitude:** W 116.69497°

### Describe the release (or potential release) and its probable nature:

Based on the fact the site was listed on the Latah County tax rolls as a patented mine claim and the fact it has been developed for residential uses, placed this site as a priority for investigation. Subsequently, it was inspected 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. However, there was no historical evidence or complaints leading to these suspicions.

**Part 1 - Superfund Eligibility Evaluation**

	YES	NO
<b>If all answers are “no” go on to Part 2, otherwise proceed to Part 3.</b>		
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 a 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).**

A site inspection involving direct observations confirmed contaminants of concern do not exist in concentrations that present a threat to human health or the environment. No contaminants, equipment, or mining related articles are on the site.

**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
<b>If the answers to questions 1, 2, and 3 above were all “yes” then answer the questions below before proceeding to Part 3.</b>		
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:**

One home site is located within the subject area; however, there were no wastes observed posing potential risks to human health or the environment. Specifically, very limited mining (exploration) activities occurred in this area and no waste dumps, adits, or discharges were observed. Two small trenches which appeared to be hand dug were detected. They were well over grown with vegetation.

**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)**

<b>Suspected/Documented Site Conditions</b>		<b>APA</b>	<b>Full PA</b>	<b>PA/SI</b>	<b>SI</b>
1. Releases or potential to release are documented at the site.		No			
2. Uncontained sources with CERCLA-eligible substances have been documented as being present on the site. (i.e. they do exist at site)		No			
3. On-site, adjacent, or nearby receptors are present.		Yes			
4. There is 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 4 mile TDL) 5. There is documentation that a sensitive receptor has been exposed to a hazardous substance released from the site.	Option 1: APA	No			
	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 1 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 “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	

<sup>DEQ</sup>  
Regional ~~EPA~~ Reviewer:

Bruce A. Schuld

*Bruce A. Schuld*

10/25/10

Print Name/Signature

Date

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

This claim contains no historic mine developments with the exception of two small trenches with two to four yards of disturbed soil. As a result of our observations, DEQ is recommending this site be designated as “No Remedial Action Planned” (NRAP). No soil or water samples were taken due to the minimal disturbance, lack of pathways for contaminants to be mobilized, and no mineralization of soils were evident at the activity sites.

**NOTES:** Please see the following photo log.



Trench 1. A small amount of material is piled on either side of the trench. As is evident, the trench is well vegetated. The material/soil piled on the sides is the same as the material/soil from the surrounding area.



Trench 2. A small amount of material is piled on either side of the trench. As is evident the trench is well vegetated. The material/soil piled on the sides is the same as the material/soil from the surrounding area.

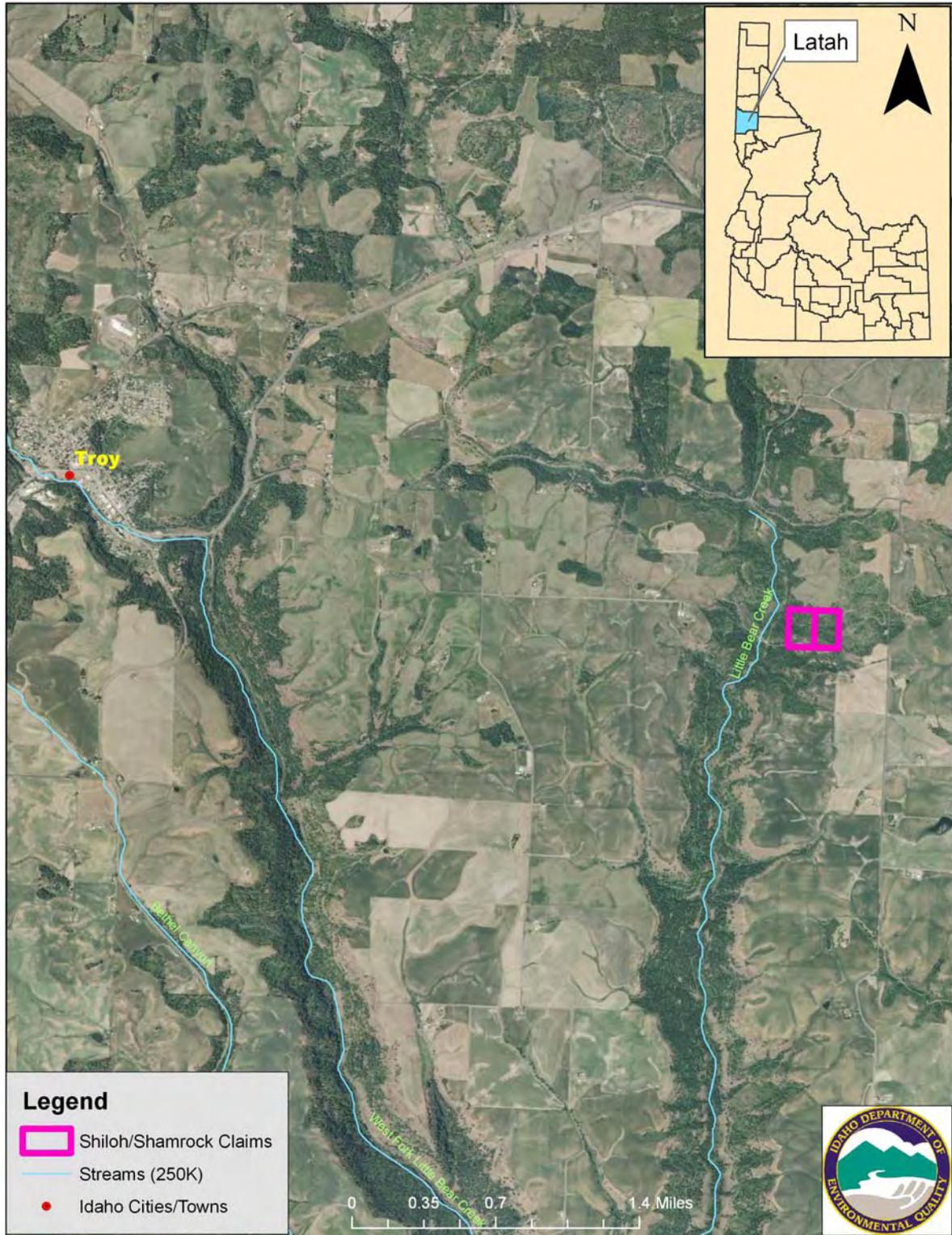


Figure 1. Location of the Shiloh and Shamrock claims with Latah County 2010 Approximate Parcel Data overlay. (Map source: 2009 natural color 1meter NAIP Idaho)

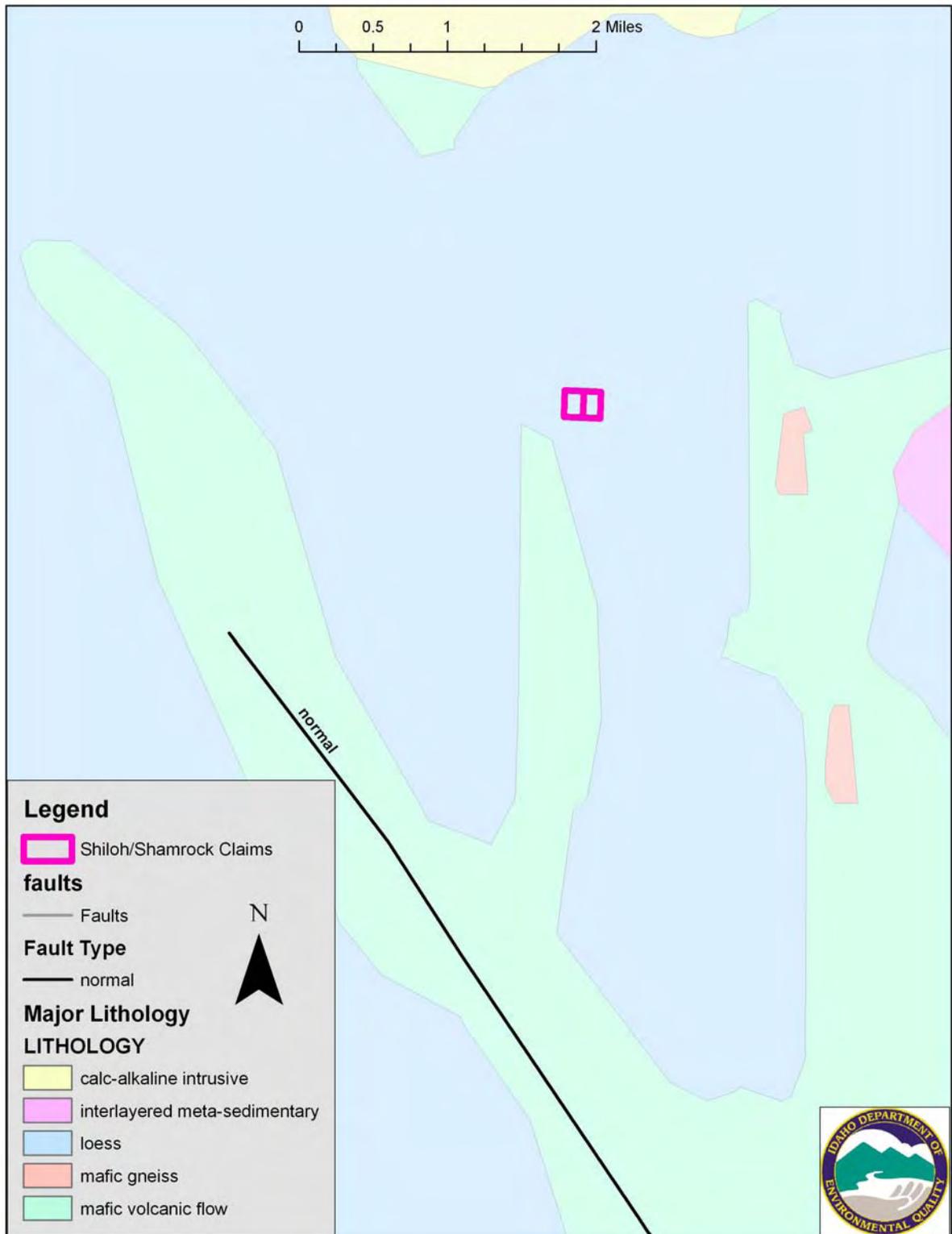


Figure 2. Major Lithology of the Shiloh and Shamrock claims. (Map source: Idaho DEQ GIS ArcSDE 9.3.1 Geodatabase)

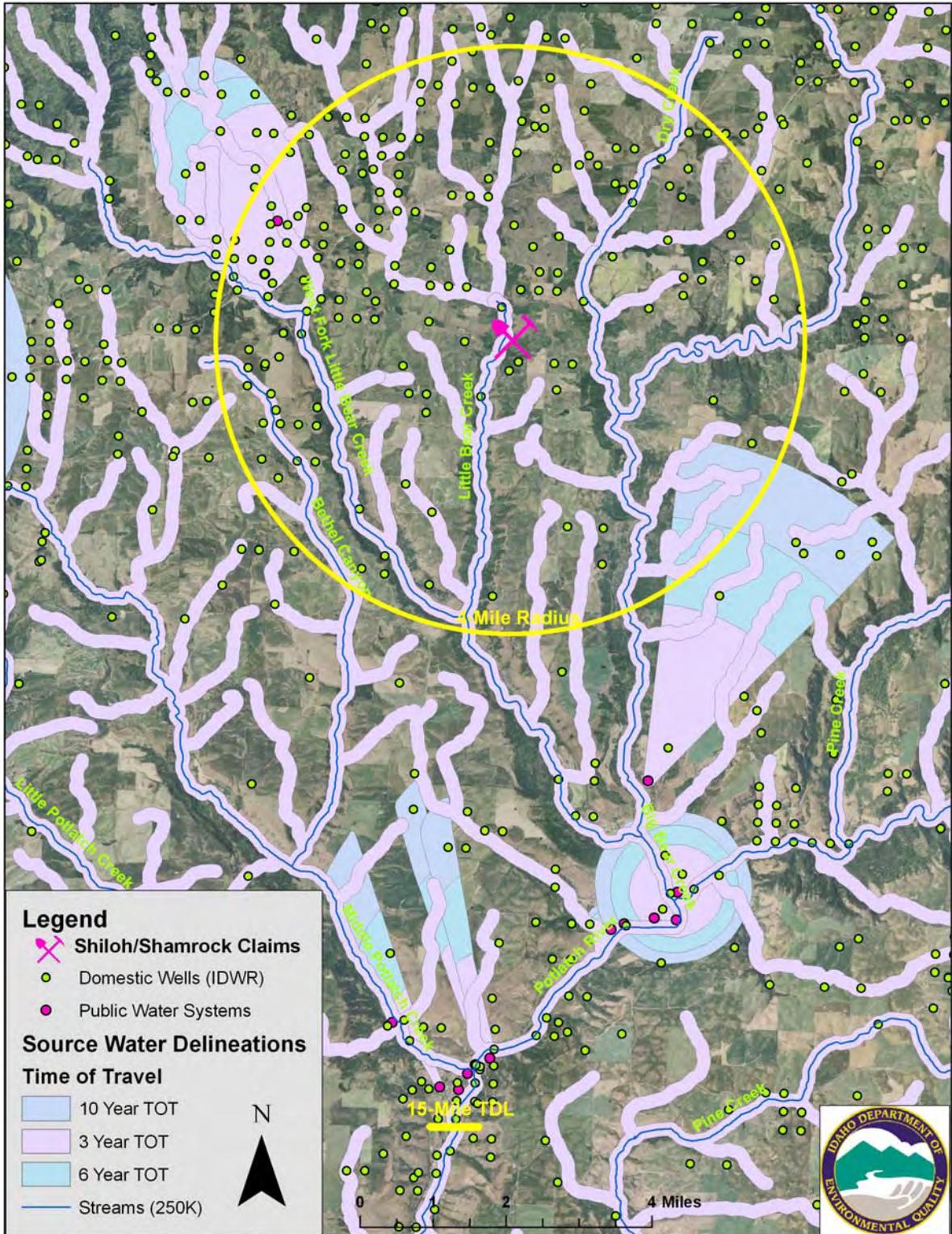


Figure 3. Drinking water well locations and source water delineations. 15-Mile Target Distance Limit (TDL). No evidence of wetlands within the TDL. (Map source: 2009 natural color 1meter NAIP Idaho)

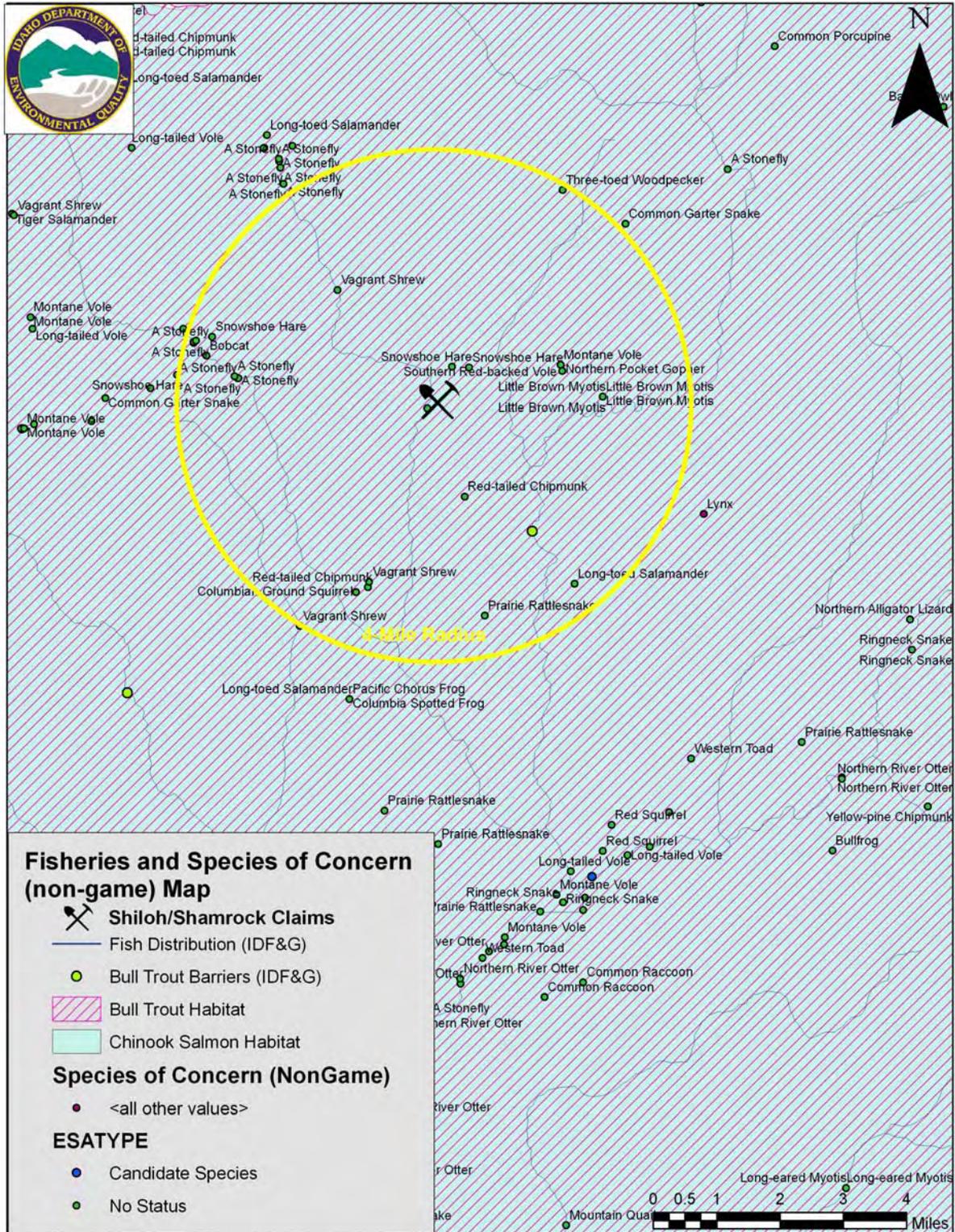


Figure 4. Fisheries and sensitive species near Shiloh and Shamrock claims. (Map source: Idaho DEQ GIS ArcSDE 9.3.1 Geodatabase)

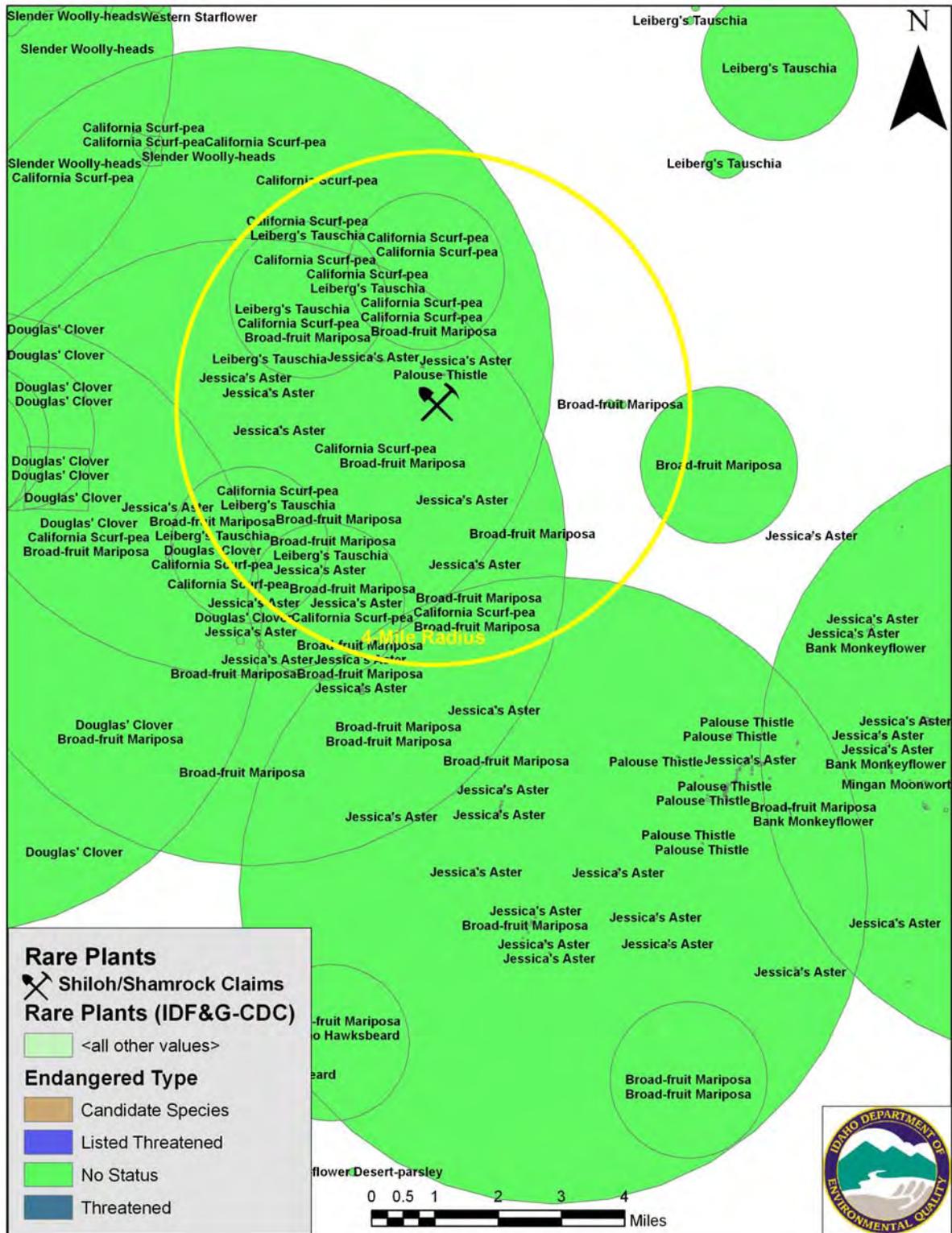


Figure 5. Rare plant species with endangered type status near Shiloh and Shamrock claims. (Map source: Idaho DEQ GIS ArcSDE 9.3.1 Geodatabase)