

KROMONA MINE AND MILLSITE

INITIATION OF CERCLA INVESTIGATION MEMORANDUM

I. PURPOSE

The purpose of this Memorandum is to document, pursuant to the Guidelines of the National Oil and Hazardous Substance Contingency Plan (NCP), 40 CFR 300, et seq., the decision to initiate a CERCLA investigation, and such further CERCLA actions as may be subsequently determined appropriate, as authorized by Section 104 (42 USC 9604) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA; 42 USC 9601 et seq.), and Executive Order 12580, 52 Federal Register 2923-26 (January 23, 1987).

A release, or threat of a release, of hazardous substances, pollutants or contaminants that potentially pose a threat to public health or welfare or the environment, has occurred or may occur at the Kromona Mine and Millsite (Site) on and/or from lands under the jurisdiction, custody, or control of the USDA Forest Service, Mt. Baker-Snoqualmie National Forest (National Forest System or NFS lands).

II. SITE CONDITIONS AND BACKGROUND

A. Site Location

The Site lies within the Sultan Mining District, located in the Mt. Baker-Snoqualmie National Forest in Snohomish County, approximately 10 miles northeast of Sultan, Washington (Plate 1). The Site is adjacent to the Middle Fork of the South Fork of the Sultan River (MFSF) approximately 3.75 miles upstream from Spada Lake (Figure 1 and Plate 1). According to the USGS 7 ½ Minute Quadrangle Map - Mt. Stickney (USGS, 1989), the Site location is described as:

- T 28 N, R 9 E, Section 13, Willamette Meridian
- Mine / Main Adit: Latitude - 47°, 54', 57.2"
 Longitude - 121°, 35', 32.3"
 Elevation - 3,390 feet (ft) above mean seal level (amsl)
- Millsite: Latitude - 47°, 55', 4.8"
 Longitude - 121°, 36', 9.8"
 Elevation - 2,394 ft amsl
- USGS Quadrangle: Mt. Stickney

B. Historical Activities

- A detailed description of the historical activities for the Site can be found in the Abbreviated Preliminary Assessment (APA) and the Site Inspection (SI). These documents are available on the Mt. Baker-Snoqualmie Website at: <http://www.fs.fed.us/r6/mbs/projects/cercla-hazmat-cleanup-projects/index.shtml>.

C. Site Characteristics

- Site characteristics are described in detail in the SI.

D. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant, or Contaminant

- A SI has been completed at the Site to determine if a release or threat of a release has occurred and it has been determined that a release has occurred and that an Engineering Evaluation/Cost Analysis (EE/CA) is warranted.
- The NCP states that an appropriate removal action may be conducted at a site when a threat to human health or welfare or the environment is identified.
 - The removal action is undertaken to abate, prevent, minimize, stabilize, mitigate, or eliminate the release or the threat of a release at a site.
 - Section 300.415(b)(2) of the NCP outlines eight factors to be considered when determining the appropriateness of a removal action.
 - The applicable factors are outlined below and provide justification for completing the removal action.

▪ **Threats to Public Health and Welfare**

Factors from Section 300.415(b)(2) of the NCP that are associated with human health:

- √ “Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.”
 - Complete exposure pathways to human (recreational) and ecological receptors (aquatic) have been documented during the SI from exposure to waste rock, tailings, soil, water, and sediment
- √ “High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.”
 - Surficial waste rock and soil is contaminated with metals.
 - Erosion of waste rock and soil at the Site may be entering the Middle Fork of the South Fork (MFSF) Sultan River.
- √ “Other situations or factors that may pose threats to public health or welfare of the United States or the environment.”
 - A RTE fish species is expected to be present in MFSF Sultan River down stream from the Site.

▪ **Threats to the Environment**

Factors from Section 300.415(b)(2) of the NCP that are associated with the environment:

- √ “Actual or potential contamination of drinking water supplies or sensitive ecosystems.”
 - MFSF Sultan River and associated ecological receptors in the vicinity of the Site are being impacted by the discharge of

contaminated water and erosion of contaminated waste rock and tailings.

- √ “High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.”
 - Surficial waste rock and soil is contaminated with metals. Erosion of waste rock and soil at the Site into MFSF Sultan River may be occurring.
 - Plants and invertebrates may be at risk at the Site from high concentrations of metals in the waste rock.
- √ “Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.”
 - Rain and snowmelt conditions cause migration of contaminated materials into MFSF Sultan River.

E. Actions Taken on the Site

- Recent actions taken at the Site include:
 - Abbreviated Preliminary Assessment, USFS 08/2003
 - Site Inspection, CES 12/2005
 - Human Health and Ecological Risk Assessment, CES 04/2006

III. PROPOSED ACTIONS AND ESTIMATED COSTS

The proposed action for the Site is to initiate CERCLA. In compliance with the NCP, an EE/CA will be performed to evaluate removal alternatives.

The anticipated costs for the various aspects of the project are uncertain at this time as valuable data is missing. However, costs for work completed and an estimate of future work is:

1. APA - \$3000
2. SI - \$86,000
3. Risk Assessment - \$23,200
4. PRP Search - \$13,900
5. EE/CA - \$65,000
6. Removal Action - \$490,000
7. Three year post-construction monitoring - \$75,000
8. Total Anticipated Cost - \$756,100

IV. ADMINISTRATIVE RECORD AND COMMUNITY RELATIONS

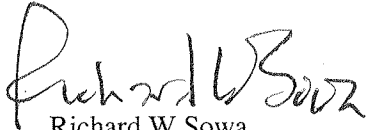
Pursuant to 40 CFR 300.415(m), I designate Rodney T. Lentz of the Okanogan & Wenatchee National Forests as the On-Scene Coordinator and Lloyd Johnson of the Mt. Baker-Snoqualmie National Forest as Spokesperson for the project.

A Community Relations Plan will be developed for this project. The Administrative Record for any response action selected will be compiled and made available during regular business hours at the office of the Mt. Baker-Snoqualmie National Forest, North Bend, Washington. A Notice of Availability of the Administrative Record will be published in local newspapers.

V. DECISION

By this Memorandum, I am initiating CERCLA activities at the Kromona Mine and Millsite as appropriate.

By copy of this Memorandum, we are formally notifying the State of Washington and EPA of our finding of the appropriateness of initiating CERCLA activities at the Site.



Richard W Sowa
Director of Engineering
Pacific Northwest Region

Date: 3/12/07

cc:
Washington DOE
EPA