



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

ACTION MEMORANDUM FOR REMOVAL ACTIONS WITH
COST CEILING LESS THAN \$200,000

January 16, 2002

FINDINGS OF IMMINENT AND SUBSTANTIAL ENDANGERMENT

Alder Gold and Copper Co., Twisp, WA
(SITE NAME AND LOCATION)

Based on the factors listed below, I have determined that an imminent and substantial endangerment to the public health or welfare, and or the environment exists because of an actual or threatened release of a hazardous substance at or from the site/incident.

I. SITE INFORMATION

Site Name: Alder Gold and Copper Co.

Site Number: 109G

Site Location: Twisp WA (Take Twisp-Carlton road off of
State Highway 20 Impacted homes: Latitude 48 20'52
through 48 21'18 Longitude 120 06'43 through 120 07'40)

Potential Responsible Party
Unknown at this time.

Access: _____ Restricted **XX** Unrestricted

NPL Status: Not an NPL Site

Removal Starting date: 1/25/02

Removal Completion Date: 8/02

II. THREAT TO THE PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

A. Site Background (Attach ERNS/spill report or trip report or provide date of initial notification, amount substance released, and cause of release. Document identity of property owner, interviews, including contact names, addresses, phone numbers):

In December 2001, the Department of Ecology referred health district private drinking water well samples containing high levels of arsenic above the anticipated removal action level (RAL) of 10 ppb to EPA. Arsenic contamination is migrating from the nearby Alder Gold and Copper Co. mine site. Arsenic is a class A carcinogen. The RAL is set by evaluating the risk posed by the MCL and setting the RAL at or above the MCL to reflect an imminent risk of at least 1×10^{-4} . For arsenic, the new MCL of 10 ppb is already above the 1×10^{-3} risk threshold, therefore the pending arsenic RAL will be set at the new arsenic MCL of 10 ppb. This RAL change is pending from EPA headquarters (OERR).

B. Hazardous Substances Present (list names and quantity of hazardous materials that have been released or may be released, describe containers, and attach sampling/hazcat information if available).

The following CERCLA hazardous substances were found at the site.

- **6 drinking water wells with arsenic levels ranging from 13 ppb to above 100 ppb. Additional results are pending from the health district.**

C. Nature of Actual or Threatened Release of Hazardous Substances (use additional sheets if necessary).

Residents are drinking from wells contaminated with arsenic from the subject site.

Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)]. **Residents are currently drinking water from their private wells exceeding RALs.**

Actual or potential contamination of a drinking water supply or sensitive ecosystems [300.415(b)(2)(ii)]. **Residents are currently drinking water from their private wells exceeding RALs.**

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].

High levels of hazardous substances or pollutants in soils [300.415(b)(2)(iv)].

Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].

Threat of fire or explosion [300.415(b)(2)(v)].

The availability of other appropriate Federal or State response mechanisms to respond to the release

[300.415(b)(2)(vii)]. **The Department of Ecology and Health District have insufficient funds available to respond to this release.**

___Other situations or factors that may pose threats to the public health or welfare or the environment.

Other Factors:

___PRP Unknown.

___PRP given opportunity to conduct removal and has declined

___State personnel available and capable to handle situation.

Explain:

PRPs likely have little resources to undertake a response. If the PRPs had the necessary resources, it is unlikely this could be carried out by them in a timely manner.

III. SELECTED REMOVAL ACTION(attach POLREPS, cost estimates, purchase requests, cleanup options, disposal methods, on-site treatment, security arrangements, etc.).

Provide bottled water to residents with confirmed arsenic contamination above the anticipated RAL from the mine site release pending alternate drinking water or tap filtration hookup by EPA (to be provided in an amended action memorandum). This estimate allows for provision of drinking water to homes for which results are pending. This estimate also assumes that water will be made available through October, 2002, to allow time for a more permanent supply to be established through the upcoming construction season.

IV. ESTIMATED COSTS

ERRS Costs	10,000
START costs	5,000
Contingency costs	5,000
Subtotal, extramural costs	20,000
Intramural Costs	
Direct	1,000
Indirect	8,000
Total, Removal Project Ceiling	28,000.00

V. Recommendations

Conditions at this site meet the NCP section 300.415(b)(2) criteria for a removal action. The finding of imminent endangerment has been entered into the administrative record for this site or incident.

Prepared by _____
Sean Sheldrake, On-Scene Coordinator

Concurrence by _____
Chris Field, Unit Manager

APPROVAL

Michelle Pirzadeh for /s/ 1/18/02

(signature) Date
Michael F. Gearheard, Director
Office Of Environmental Cleanup

DISAPPROVAL

(signature) Date
Michael F. Gearheard, Director
Office Of Environmental Cleanup

Reason(s) for Disapproval:

Alder Gold and Copper Co. (Twisp WA) Action Memo Check-off Sheet

Coordination with:	Point of contact	Copy
1) ORC	Cyndy Mackey	
2) ATSDR	Richard Kauffman	
3) State	Rick Roeder -WDOE	
4) Ops Office	NA	
5) Hanford Office	NA	
6) DOI	NA	
7) NOAA	NA	
8) PRP Search	NA	
9) Acct No/CERCLIS	See Action Memo	
10) Comm. Relations	TBA (copy to Kathy Veit)	
11) NPL Coordination	NA	
12) ERRs/START DPOs	Michael Sibley	
13) Record Center	Craig Conant	
14) IGCE	Yes for this action	
15) Tribal Office	NA	