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May 9, 2022

Attn: Sandra Treccani
Hydrogeologist
Toxic Cleanup Program
WA. Dept. of Ecology
4601 N Monroe
Spokane, WA 99205

Subj: 2022 Pentennial MMR Report: Former Josephine Mill No. 1

Dear Ms. Treccani:

Stimson employees Wade Pierce (Area Woodlands Manager) and Steven Petrin (Environmental Manager) completed an annual spring site inspection on May 5, 2022 pursuant to the Post Removal Site Control Plan (PRSCP) found in Appendix E to the Final Removal Action Report (RAR) dated February 10, 2012. The PRSCP outlines the long-term maintenance and monitoring obligations to ensure the continuous protection, integrity and stability of the mine waste repository constructed at the former Josephine Mill No. 1 in Pend Oreille County, Washington. Your letter of 7 July 2017 extended the inspection frequency period to five years (pentennial) from the previous requirement of annually. This letter serves as the 2022 pentennial spring Monitoring Maintenance and Repairs (MMR) report.

No 100-year storm event, and no other significant event (earthquake, extreme weather event, forest fire, etc.) occurred at the site since the last inspection was completed on June 9, 2017.

The following pages list (in bold) those items to be included in the inspections during each site visit (Section 3.1.1 of the PRSCP) with relevant comments and observations depicted in italics. All photos were taken during the May 5, 2022 inspection. There was no sign or potential sign of damage to the items below, therefore no repairs are recommended.

Confirm presence and condition of warning signage

- All 3 warning signs remain upright and in place, were undamaged, and are readily visible.



Lower sign: Looking North



Upper sign: Looking East



Upper sign: Looking East

Confirm presence and operation of site controls including access gates

- *The gate was closed and in good working order with an intact lock. Boulders and other structures designed to restrict vehicular entry remain in place and were undamaged. The evidence of sporadic ATV access referenced in the 2017 Inspection Report appears to have waned over the years. We noted the disturbed area referenced had not seen entry for quite some time.*



- Gate fully functional. Now also has BLM lock.

Peripheral access control working as planned.



Peripheral access control effective.



Road fully vegetated.

Observe the condition of the repository cover and identifying areas of movement, erosion or exposed liner

- *The repository cap appears stable and has a good vegetative cover dominated by grasses. The logs distributed on the cap to discourage entry are in good physical condition and have not been disturbed since original placement. No erosion or areas with exposed liner were visible, and there was no evidence of mass movement. We did note recent gopher activity on cap and in surrounding area. After lengthy discussion, it was agreed that allowing natural processes to control gopher activity is more favorable than traditional means which would increase the potential to disturb the cap and liner.*



Condition of cap, looking east.



Condition of cap, looking west.



Recent gopher activity on cap.



Recent gopher activity. Bottom of cap.

Observe operation of the underdrain system and cleanout as necessary

- *The underdrain system appeared to be functioning as engineered, and all cleanouts were clear of debris.*



Observe the condition of stormwater management structures

- *No visual damage to the system was evident. There continues to be ingrowth of both hardwood and conifer trees and brush in the rip-rap area between repository cap and stream.*



Rip-rap area below cap stable and revegetating.



Woven textile on east edge of cap in good condition.



Drainage feature above cap in stable condition, no rutting.

Visual evidence or indications of mine waste release

- *No evidence or indications of mine waste or potential for release was observed.*

Please don't hesitate to call if you have any questions. Thank you.

Sincerely,

Wade Pierce

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