

October 25, 2004

Jim Alexander
US Department of Agriculture
Office of General Counsel
1220 SW Third Ave.
Room 1734
Portland, OR 97204

Dick Sawaya
USDA Forest Service
Pacific Northwest Region
P.O. Box 3623
Portland, OR 97208

RE: Azurite Mine

Dear Jim and Dick:

I am writing to you as a follow up to our recent conversation regarding the Azurite Mine. In a letter dated September 24, 2004, the ASARCO corporation not only denied the USFS request that an EE/CA be conducted, but also attempted to imply that the site does not represent an environmental concern.

The State of Washington does not agree with ASARCO's representation regarding the level of environmental concern at this site. Washington ranks sites utilizing the Washington Ranking and Assessment Method (WARM). In a quick review of our files it does not appear that Azurite has been through the entire ranking process. However, from looking at the information that we do have, it is anticipated that the site would likely rank a 2 on a scale of 1 to 5, with 1 being highest priority. (For example, a site visit made by Ecology staff the summer of 2001 documented the pH of waters along the toe of the tailings at 3.82). Primary media of concern appears to be soils, surface water runoff, and ecological damages.

Additionally, I wanted to inform you that we have taken a quick look at how this site compares to other known mine sites within Washington. Again, we see the site as a high priority. In fact, high enough that our current budget request included a request for \$700,000 towards site work. It would be our suggestion that as either of us budget moneys for work or as we pursue responsible parties at this site, that we combine efforts much as we have for the Holden Mine site.

In closing I would like to say that Ecology is glad to see the USFS pursuing responsible parties for cleanup funding at the Azurite Mine. From our view this site clearly warrants attention in the very near future.

Please feel free to call me at (509) 454-7837 if you have any questions or want to talk more about ways and opportunities to coordinate our efforts.

Sincerely,

A handwritten signature in black ink that reads "Rick Roeder". The signature is written in a cursive style with a prominent initial "R".

Rick Roeder
Site Manager
Toxics Cleanup Program