

**TREASURE MOUNTAIN JUNIOR HIGH SCHOOL
COMMUNITY INVOLVEMENT PLAN
LOCATED AT 2530 KEARNS BOULEVARD
PARK CITY, UTAH 84060**

OCTOBER 13, 2023

PREPARED FOR



PREPARED BY



**47 West 9000 South, Suite 2
Sandy, Utah 84070
Phone: (801) 971-3988
sgalley@rrenviro.com**

TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	Purpose of the Community Involvement Plan (CIP)	1
1.2	Outreach Objectives	1
1.3	Contact Information	2
2.0	PROJECT HISTORY AND FUTURE	3
2.1	Site History	3
2.2	Site Location	3
2.3	Sampling and Analysis Procedures	6
2.4	Previous Environmental Studies and Response Actions	7
2.5	Previous and Future Site Activities	8
3.0	COMMUNITY ANSWERS	9
3.1	Environmental Concerns	9
3.2	CERCLA Stigma	11
3.3	Health Concerns	11
3.4	Economic Concerns	11
3.5	Remediation Concerns	12
4.0	PLANNED COMMUNITY INVOLVEMENT ACTIVITIES	13
4.1	Website Address	13
4.2	Town Hall	13
4.3	Close Out	13
5.0	CERTIFICATION OF PLAN	14
6.0	APPENDICES	15
	APPENDIX A—REVISION LOG	
	APPENDIX B—PCSD-RECORDED ENVIRONMENTAL COVENANT	

1.0 INTRODUCTION

R&R Environmental, Inc., has prepared this Community Involvement Plan (CIP) on behalf of Park City School District (PCSD). PCSD is issuing this CIP as a resource to enable meaningful community involvement throughout the investigation, selection, and implementation of cleanup activities at Treasure Mountain Junior High School (the Site). PCSD is conducting these cleanup activities at the Site according to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§ 9601, et seq., and its implementing requirements under the Site's environmental covenant (Environmental Covenant of Parcel #PCA-98-A-X, file dated February 10, 2017).

PCSD is committed to encouraging public participation and providing opportunities for communication among PCSD and the affected community, interested stakeholders, and community residents during the environmental investigation and cleanup activities at the Site.

1.1 Purpose of the Community Involvement Plan (CIP)

The CIP describes PCSD's plan and serves as a guide for addressing concerns and engaging and informing community members, environmental groups, government officials, the media, and other parties interested in the environmental investigation and cleanup activities at Treasure Mountain Junior High School. This CIP has been prepared in accordance with CERCLA and is a living document that will be updated or revised as appropriate as Site conditions or circumstances change.

The CIP has two key objectives. The first key objective is to help disseminate information to the public in a timely, accurate, meaningful, and clear manner. The second objective is to create opportunities for active public participation and to ensure the community understands those opportunities, enabling interested persons to provide comments that can be used by the PCSD project team for planning and decision-making.

1.2 Outreach Objectives

The outreach objectives are to

- Help the public understand the decision-making process during investigation and cleanup and the community's role in that process.
- Give the public accessible, accurate, timely, and clear information about the project as it moves forward.
- Ensure the public has adequate time and opportunity to give informed and meaningful input and for that input to be considered.
- Reflect community concerns, questions, and information needs.
- Respect and fully consider public input throughout the decision-making process.
- Post updates at the Park City School District Website (<https://www.pcschools.us/>).

1.3 Contact Information

If you are interested in submitting comments or have questions or suggestions concerning this CIP, please contact Mr. Michael Tanner:

Mr. Michael Tanner
Chief Operations Officer
Park City School District
2700 Kearns Boulevard
Park City, Utah 84060
(435) 645-5600, ext. 1429
mtanner@pcschoools.us

2.0 PROJECT HISTORY AND FUTURE

2.1 Site History

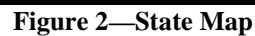
Elevated levels of lead were found north of Treasure Mountain Junior High School, located at 2530 Kearns Blvd., Park City, Utah, within the boundaries operable unit 1 (OU1) of the Uintah Mining District Site in Park City, Summit County, Utah. In carrying out an Action Memorandum dated September 10, 2015, and amended on July 12, 2016, the U.S. Environmental Protection Agency (EPA) completed a removal action at the Site, excavating contaminated material and providing a six-inch cap of clean fill under the authority of the Comprehensive Environment Response Compensation and Liability Act of 1980. An environmental covenant was agreed to and recorded by EPA, DEQ, Park City, and the Park City School District, which was necessary to fully implement this removal action. A copy of the covenant is included in Appendix B of this Plan.

Approximately seven years ago, the soil excavated from McPolin Elementary School was placed into piles north of Treasure Mountain Junior High School, where two piles are located today. In addition, between September 2022 and February 2023, soil from the east side of McPolin Elementary School was excavated in order to demolish parking and roadway infrastructure for the school. The soil from McPolin Elementary was intermingled with existing soils from Treasure Mountain Junior High, placed onto the property north of the junior high, and covered with soil from a nearby location. During this time, on multiple occasions, the contractor had moved the soil in the piles to places around the site to facilitate ongoing site work.

2.2 Site Location

To accomplish the CIP objectives, PCSD takes into consideration the location of the Site and surrounding community. The Treasure Mountain Junior High School Site is in Summit County at 2530 Kearns Boulevard, Park City, Utah 84060. See Figure 1 below.

The Site is also known as Parcel #PCA-98-A-X, according to the Summit County Recorder's office. As a school, the Site experiences high annual visitation for 185 days per year.



COMMUNITY INVOLVEMENT PLAN
North Soils Piles
Treasure Mountain Junior High School

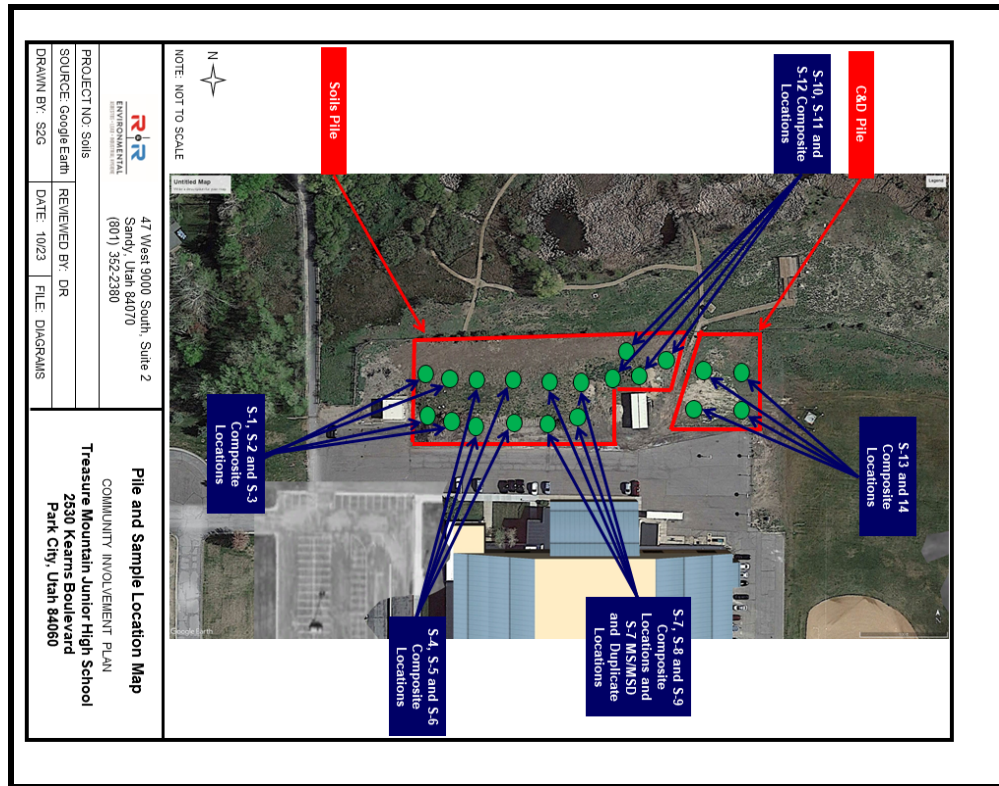


Figure 3—Pile Area Map

The actual pile shapes indicated below represent the survey of the existing piles prior to adding the sampling cap during the week of July 10, 2023.

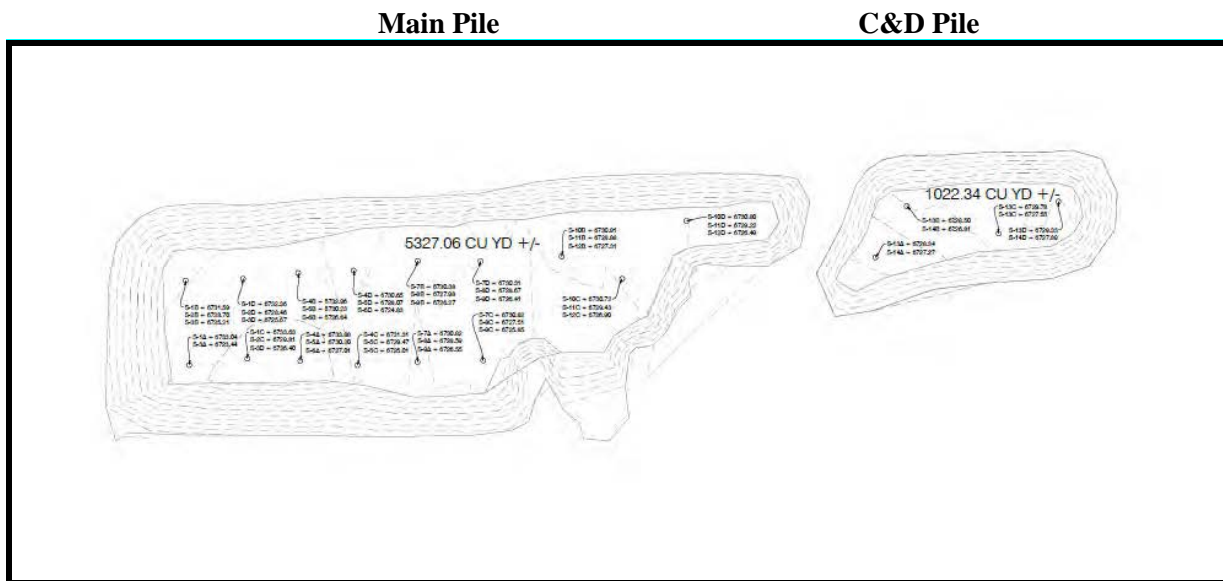


Figure 4—Survey of Piles

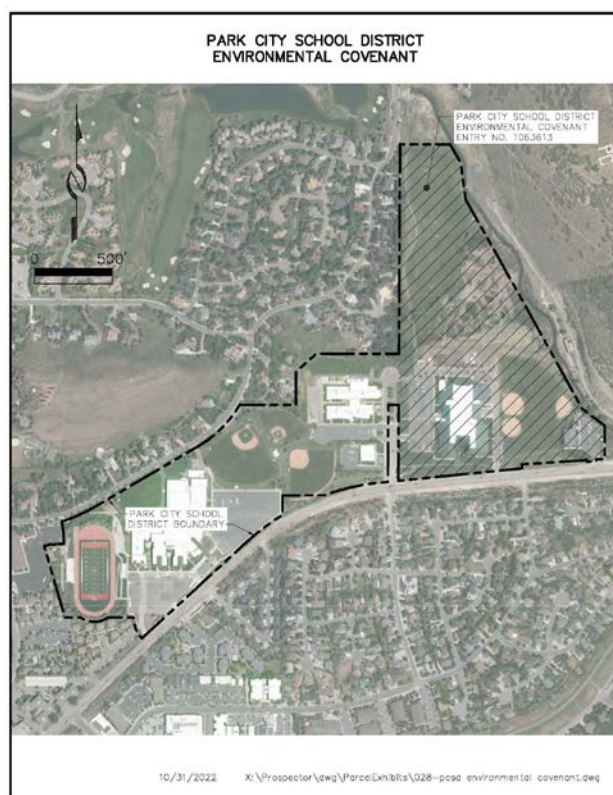


Figure 5—Park City School District Environmental Covenant Boundaries

2.3 Sampling and Analysis Procedures

R&R Environmental, Inc., sampled the piles on July 10 and 11, 2023, obtaining 14 composite samples (from a total of 70 locations including duplicates and matrix spikes) from the soils piles, five grab samples from the existing cap material, and one sample of the newly imported cap material. The soil pile samples were analyzed for RCRA total metals and by a Toxicity Characteristic Leaching Procedure (TCLP). The cap material samples were analyzed for total lead. The laboratory data obtained from the sampling conducted on July 10 and 11, 2023 is attached.

Based on the laboratory results and the gathered data, the main soils pile is below Resource Conservation and Recovery Act (RCRA) limits, and RCRA would not classify the soils in the main soils pile as a hazardous waste. The smaller C&D pile to the east exceeded the RCRA limit for lead of 5.0 mg/L. (See RCRA 40 CFR, Subchapter I, Part 261.24, Table 1 –Maximum Concentration of Contaminants for the Toxicity Characteristic.)

Based upon the history of McPolin Elementary and Treasure Mountain Junior High, the methods of soil deposition onto school grounds, the collection methods for samples, and the analytical results of samples, along with the legally available characterizations and discussions with the State of Utah, DEQ, and the Division of Environmental Response and Remediation (DERR), the soils in both piles are considered a Bevill-exempt waste.

Because the surveyed cap thickness was less than adequate, and the laboratory results for lead were higher than specified limits (368 mg/kg), 645 cubic yards of imported clean gravel were added onto the soil cap immediately following sampling activities (July 12–14, 2023) to increase the soil cap thickness to the required minimum of six inches. Final cap thickness now measures between six and nine inches. The imported fill was sampled and tested for lead concentrations; the sample (SC-1) contained a reported 3.27 mg/kg total lead.

The addition of soil to correct cap thickness was completed on July 14, 2023. Clean fill with less than 200 mg/kg lead was used for cap completion. A layer of straw fabric was placed over the clean fill cap on July 14, 2023, to prevent erosion of the emplaced cap material.

Posts, fencing, signage, and base erosion control were also reset by July 14, 2023. Base erosion control was enlarged and moved north to the fence line to incorporate areas where erosion had occurred in the past. The soils piles and management practices are being inspected weekly by R&R Environmental, Inc., which should continue until the materials are removed from the site for proper disposal.

The total pile volumes that presently exist on the property:

645 cubic yards imported fill	
5,327.06 cubic yards main pile	
<u>+ 1,022.34 cubic yards C&D pile</u>	
6,994.4 cubic yards total	≈ 7,000 cubic yards of material

Note: Additional material beneath the soils piles will need to be removed with the piles to facilitate cap replacement above the covenant soils of Park City.

2.4 Previous Environmental Studies and Response Actions

- 11-15-1 Park City Landscaping and Maintenance of Soil Cover, amended by Ordinance 03-50 on December 11, 2003
- ERCC-163-22 letter from Utah Division of Environmental Quality (DEQ), from Division of Waste Management and Radiation Control (DWMRC) to PCSD
- Treasure Mountain Middle School Excavated Piles letter from UDEQ-DWMRC to PCSD
- Treasure Mountain Junior High School Soils Sampling and Analysis Plan (SAP), R&R Environmental, Inc., dated January 20, 2023, revised May 23, 2023
- ERRC-041-23 Draft Treasure Mountain Junior High School Sampling and Analysis Plan, letter from DEQ-DERR to PCSD, dated March 9, 2023
- Treasure Mountain Junior High School Health & Safety Plan (HASP), R&R Environmental, Inc., dated May 23, 2023
- Treasure Mountain Junior High School Soils and C&D Piles Bevill Exemption letter from R&R Environmental, Inc., to the DEQ–Division of Environmental Response and Remediation (UDEQ-DERR), dated August 2, 2023, revised October 2, 2023
- Treasure Mountain Junior High School Soils Sampling and Analysis Report, R&R Environmental, Inc., dated October 2, 2023, *pending review*
- Treasure Mountain Junior High School Community Involvement Plan (CIP), R&R Environmental, Inc., dated October 13, 2023
- Treasure Mountain Materials Management Plan & HASP accompaniment, R&R Environmental, Inc., *pending completion*

2.5 Previous and Future Site Activities

- Approximately 2016—Soil excavated from McPolin Elementary School was placed into piles behind Treasure Mountain Junior High School. See Section 2.2.
- December 19, 2023—R&R Environmental, Inc., conducted initial assessments of the soils piles as requested by PCSD. The initial assessment confirmed the technical position of EPA and DEQ and recommended the completion of a Sampling and Analysis Plan and a Materials Management Plan.
- February 4, 2023—R&R Environmental, Inc., commenced weekly piles inspections, erosion control, and management practices at the request of DEQ through PCSD.
- July 10 and 11, 2023—R&R sampled both piles from multiple locations at multiple depths and performed total metals analysis as well as TCLP metals analysis.
- July 12–14, 2023—The piles were recapped with a minimum of six inches of fill material that tested less than 200 mg/kg for lead. Posts, fencing, signage, and erosion control mechanisms were reset to prevent access and runoff. A straw blanket was placed over both piles to prevent wind erosion from the cap materials.
- TBD (DEQ-mandated prior to January 1, 2024)—Soils piles can be removed as a Bevill-exempted waste.
- TBD—Sampling of surrounding area and school and replacement of six-inch Park City soil cap to comply with existing covenants.

3.0 COMMUNITY ANSWERS

Active, ongoing community input and involvement are essential to the district's decision-making ability. Community members should be involved in all phases of the investigation and cleanup so that the contamination is addressed in a way that protects people and the environment, now and in the future.

Residents, business owners, and local government officials may be able to provide valuable information about a hazardous site that can help determine the best way to clean it up. Community information can help determine the contamination's location, how people may be exposed, or even the sources of the contamination.

Park City School District's demographics describe student attendance at the campus in grades as shown below. This information may be used to determine the number of students, families, and staff that may desire involvement in the decision-making process.

Grade	number
Pre-k	35
K	58
1	49
2	76
3	69
4	64
5	74
8	376
9	395
10	382
11	411
12	426

3.1 Environmental Concerns

Initial anticipated community concerns are identified below, along with responses.

Q. What are the contaminants?

A. Arsenic and lead are the known existing contaminants in the piles. Asbestos has not been identified in the construction debris. However, future operations and disturbances will be inspected by a federally-accredited and State-of-Utah-certified Asbestos Inspector during all phases of the site operations.

Q. What are regulatory limits and levels of concern?

A. The RCRA hazardous waste limits are 5.0 ppm (TCLP) for both arsenic and lead. For capping material, levels of concern are set at a total of 200 mg/kg (ppm) total lead by environmental covenant.

Q. What does TCLP mean?

A. TCLP is an acronym for Toxicity Characteristics Leaching Procedure, which was developed by the EPA. A TCLP analysis is used to determine the potential of specific wastes to leach dangerous concentrations of toxic chemicals into groundwater.

Q. How did the contaminants get here?

A. Arsenic and lead are naturally-occurring metals due to the geology in Utah, and the levels at which these metals naturally occur can be hazardous.

The Park City area has been a historic mining location since the 1860s. The arsenic and lead metals were not typically collected like the more valuable metals of silver, gold, and platinum. Due to the mining activities, processes, handling, and extraction, byproduct metals like arsenic and lead became concentrated, which can be a health concern if not handled and capped properly.

These types of soils and metals are now mostly capped and exist below many areas in Park City. Some of the contaminant soils in these Site piles are from Treasure Mountain Junior High School, and some are from other school district locations, such as next door at McPolin Elementary School. The soils were excavated by a PCSD subcontractor and placed north of Treasure Mountain Junior High School. They were originally intended to be a visual barrier.

Figure 6 below shows how existing soils and caps in Park City are typically placed.

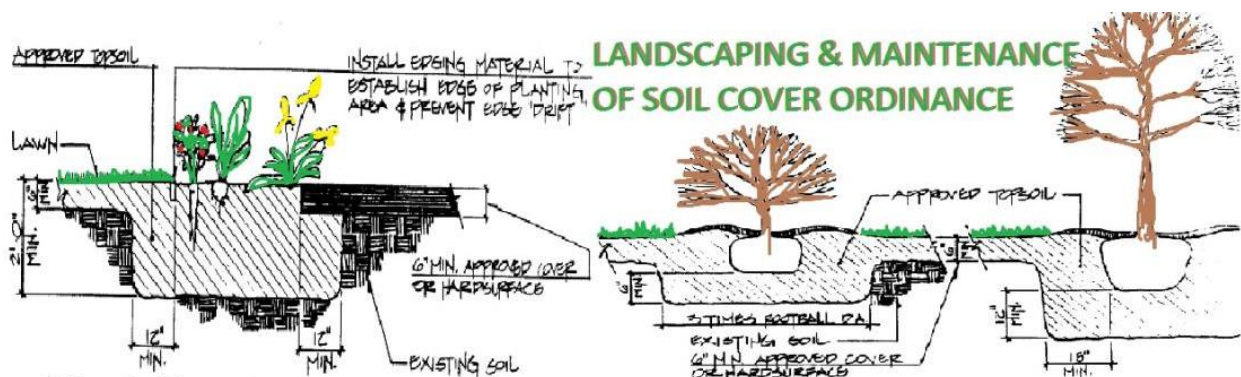


Figure 6—Park City Landscaping & Maintenance of Soil Cover Ordinance Graphic

Q. Where are the contaminants going?

A. Due to the cap placed over the soils, the contaminants are not currently being transported by air. Most of the contaminants remain in the soils piles while they stay in place. However, some metals may leach into the adjacent wetlands to the north. Note that the wetlands contain the same soils and metals (contaminants) that currently exist in the soils piles. Asbestos typically does not migrate well through soils.

Ultimately, the material will be moved from its current location to an approved landfill site that has agreed to take and dispose of the waste.

Q. Will wildlife be harmed?

A. Arsenic and lead can impact wildlife like humans. The wetlands soils are considered the same types of soil as what exists in the piles due to years of leaching. Therefore, the hazard to wildlife does not greatly increase under current conditions.

3.2 CERCLA Stigma

Q. What does CERCLA mean?

A. CERCLA is an acronym for the Comprehensive Environmental Response, Compensation, and Liability Act, otherwise known as Superfund. CERCLA provides the federal government authority to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Usually CERCLA authority applies to larger issues like whole cities with mine tailings and not to a single school site.

Q. What is a CERCLA stigma?

A. A CERCLA stigma is a perceived threat in the minds of potential real estate buyers and lenders due to CERCLA involvement, and it mostly impacts commercial real estate values. CERCLA determination stays with the land even after closure. However, Park City has already been part of the CERCLA process, so this event is considered an addition to the existing history of the site. And should not add any new CERCLA stigma to properties.

3.3 Health Concerns

Q. Are the contaminants migrating via air?

A. The contaminants are not migrating via air transport. The soils have been capped with a minimum of six inches of capping material that contains less than 200ppm lead, which is preventing migration via air.

Q. Are the contaminants migrating via soil and groundwater?

A. The contaminants are likely migrating through the soil in small quantities via groundwater. However, note that the soils beneath the pile, excluding the original site soil cap, are the same types of materials as what is in the soils piles.

Q. Are the contaminants migrating via surface water?

A. The contaminants are not migrating via surface water. The soil piles have been capped. Erosion control barriers surround both piles. These engineering controls allow much of the surface water to evaporate or percolate into the ground but do not allow it to run off the site. Engineering inspections occur on a weekly basis to ensure engineering controls are adequate.

Q. How do I know if my child has been harmed?

A. If you have a concern, you can have your child's blood lead level tested.

3.4 Economic Concerns

Q. What is the cost of remediation?

A. The costs are currently estimated to be between \$1.5 and 2 million (USD).

Q. Are there grants or funds that can be utilized?

A. Typically, grants can pay for situations like this. However, because the material must be removed quickly, the Park City School District or the State of Utah will ultimately pay the remediation costs.

3.5 Remediation Concerns

Q. Is this material going to be spilled throughout the city during the removal?

A. R&R will establish strict controls (as outlined in the Materials Management Plan [MMP]) to minimize and limit community exposure. Protocols indicated in the plan will remediate any spills during the relocation process.

Q. Will the community be exposed (via air) during remediation (pile movement)?

A. All disturbances to the soils piles will occur using wet methods. Wet methods add water during disturbance to minimize the spread of dust. The application of water is balanced carefully so as to not cause unnecessary runoff. Therefore, dust will be kept down on the site. Meteorological data will also be used to minimize the impact of weather, like strong winds. The perimeter will also be sampled during the relocation process.

Q. Will the piles be moved when my child is attending school?

A. The piles will only be moved when school is not in session (winter, spring, or summer breaks). The school grounds and parking lots will also be closed during relocation activities that will disturb the cap.

4.0 PLANNED COMMUNITY INVOLVEMENT ACTIVITIES

4.1 Website Address

The community may access the Park City School District website (<https://www.pcschools.us/>) for any updates to the project.

4.2 Town Hall

There are currently two town halls scheduled to discuss cleanup activities:

- Town Hall in Spanish
 - Date: November 8, 2023, 6:00 p.m. MST
 - Location: Treasure Mountain Junior High Library (and via Zoom)
 - Address: 2530 Kearns Blvd, Park City, Utah 84060
- Town Hall in English
 - Date: November 9, 2023, 6:00 p.m. MST
 - Location: Treasure Mountain Junior High Cafeteria/Forum (and via Zoom)
 - Address: 2530 Kearns Blvd, Park City, Utah 84060

4.3 Close Out

Other town hall events or community outreach activities may occur if deemed necessary. Updates will be posted on the Park City School District website (<https://www.pcschools.us/>).

5.0 CERTIFICATION OF PLAN

This Community Involvement Plan (CIP) was completed by R&R Environmental, Inc., as indicated by the signature below. PCSD was closely involved in the completion of this plan and the scheduling of activities.

R&R Environmental, Inc.



Stephen S. Galley, CSP
Environmental Services Director, Vice President

6.0 APPENDICES

Appendix A—REVISION LOG

Appendix B—PCSD-RECORDED ENVIRONMENTAL COVENANT

SOILS SAMPLING AND ANALYSIS PLAN
North Soils Piles
Treasure Mountain Junior High School

APPENDIX A
REVISION LOG

APPENDIX B

PCSD-RECORDED ENVIRONMENTAL COVENANT