TREASURE MOUNTAIN JUNIOR HIGH SCHOOL
SOILS PILES
GENERAL QUESTIONS AND ANSWERS

Initial anticipated community concerns are identified below. Responses to those anticipated community concerns are also indicated.

Q. <u>What are the contaminants?</u>
A. Arsenic and lead are the known existing contaminants in the piles. Asbestos has not been identified in the construction debris. However, operations and disturbance will be inspected, by a federally accredited and State of Utah certified Asbestos Inspector, during all phases of the site operations.

Q. <u>What are regulatory limits and levels of concern?</u>
A. The RCRA hazardous waste limits are 5.0 ppm (TCLP) for both arsenic and lead. Capping material levels of concern are set at 200 mg/kg (ppm) (total) by environmental covenant.

Q. <u>What does TCLP mean?</u>
A. The TCLP analytical procedure is an anachronym for Toxicity Characteristics Leaching Procedure and was developed by EPA. A TCLP analysis is used to determine the potential of specific wastes to leach dangerous concentrations of toxic chemicals into groundwater. The analysis simulates a 100-year rainfall event in the Amazon River Basin for leaching comparison in rainfall percolation through a landfill.

Q. <u>How did the contaminants get here?</u>
A. Arsenic and lead are naturally occurring metals due to the geology in Utah and the naturally occurring levels of these metals 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, the byproduct metals like arsenic and lead became concentrated and can be a health concern if not handled and capped properly.

These types of soils and metals are now mostly capped and are below many areas in Park City. Some of the contaminant soils we are dealing with 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 subcontractor to the PCSD and placed north of Treasure Mountain Junior High School with the intent of becoming a visual barrier.

Existing soils in Park City are typically placed similar to what is shown in the below graphic (Figure 6).

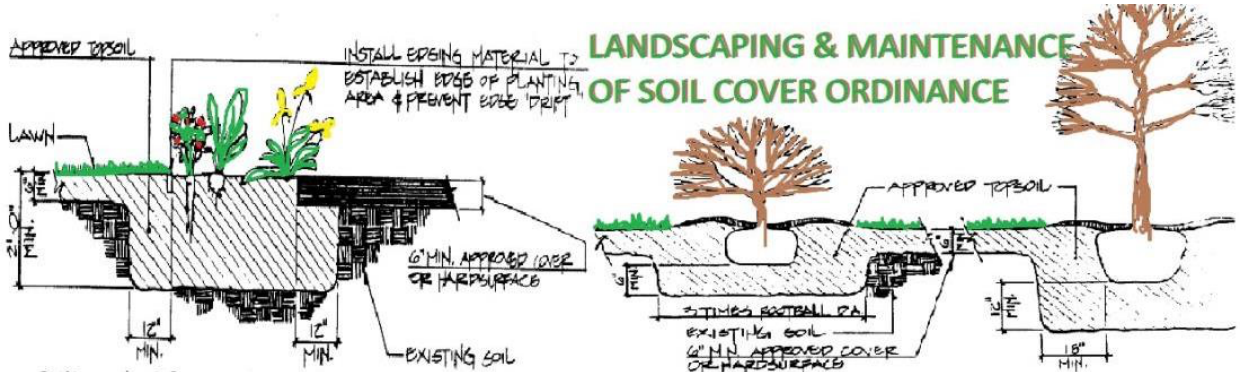

Figure 6 – Park City Landscaping & Maintenance of Soil Cover Ordinance Graphic

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 remain in place. However, some metals may leach into the adjacent wetlands to the north. It is noted, 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 may impact wildlife in a similar manner to humans. The wetlands soils are considered the same types of soil as what exists in the piles. Therefore, the hazard does not greatly increase to wildlife with what is presently existing.

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 this is for large types of issues like Park City as a whole with mine tailings.

Q. What is a CERCLA Stigma?

A. A CERCLA Stigma mostly impacts commercial real estate values because a perceived threat exists in the minds of potential real estate buyers and lenders. The CERCLA determination stays with the land even after closure. However, Park City has already been part of the CERCLA process.

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 6-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 via groundwater through the soil in small quantities. However, it is noted, 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. There are erosion control barriers around 100% of the piles. These engineering controls allow much of the surface water to percolate into the ground or evaporate and not 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.

Q. What is the Cost of Remediation?

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

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

A. There are typically grants that may be used for situations such as this. However, due to the time constraints of getting rid of the material, the Park City School District and/or the State of Utah will ultimately pay this.

Q. **Is this material going to be spilled throughout the city during the removal?**
A. Strict controls (as outlined in the Materials Management Plan (MMP)) will be established to minimize and limit community exposure. Protocols are indicated in the plan to remediate any spills during the relocation process.

Q. **Will the community be exposed (via air) during remediation (pile movement).**
A. All material disturbances made will occur using wet methods. Therefore, dust is kept down on the site. Meteorological data is also used to minimize weather impacts such as strong winds. Perimeter sampling will also be undertaken 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 (ex. winter break, spring, or summer). The school grounds and parking lots will also be closed during activities that disturb the cap for relocation.

EXISTING SITE CONDITIONS ARE SHOWN BELOW


Completed main pile cap – northeast


Completed main pile cap - west


Completed cap and straw layer C&D Pile - east


Posts, fencing, signage, erosion control.