



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Ref: 8EPR-ER

JUL 12 2016

**MEMORANDUM**

**SUBJECT:** Request for a Change in Scope and Ceiling Increase for the Removal Action at the Uintah Mining District Site in Summit County, Utah

**FROM:** Martin McComb *Martin McComb*  
Federal On-Scene Coordinator

**THRU:** Laura Williams, Unit Leader *Laura Williams*  
Emergency Response  
David A. Ostrander, Program Director *David A. Ostrander*  
Emergency Response & Preparedness

**TO:** Martin Hestmark, Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation

Site ID# A8K3

**I. PURPOSE**

The purpose of this Action Memorandum Amendment is to expand the scope of the time-critical removal action at the Uintah Mining District Site (Site) located in Park City, Summit County, Utah to include the Treasure Mountain Junior High School as Operable Unit 01. This Amendment also increases the overall cost ceiling for the removal action.

Lead is the hazardous substance of concern. The expanded scope involves excavating contaminated soil and improving the soil cover at the school and on the adjacent recreational fields to limit the exposure of students, grounds keepers and the general public to lead in the soil.

This amendment supplements the Action Memorandum for the Site signed on September 10, 2015 (See Attachment 1).

**II. SITE CONDITIONS AND BACKGROUND**

Site Name:	Uintah Mining District
Site ID (SSID):	A8K3
NRC Case Number:	Not Applicable
CERCLIS Number:	UTN000801643
Site Location:	Summit County, Utah
Lat/Long:	40.6461/-111.4980
Potentially Responsible Party:	United Park City Mines (UPCM)
NPL Status:	non-NPL
Removal Start Date:	10/01/2015

## A. Site Description

### 1. Removal Site Evaluation

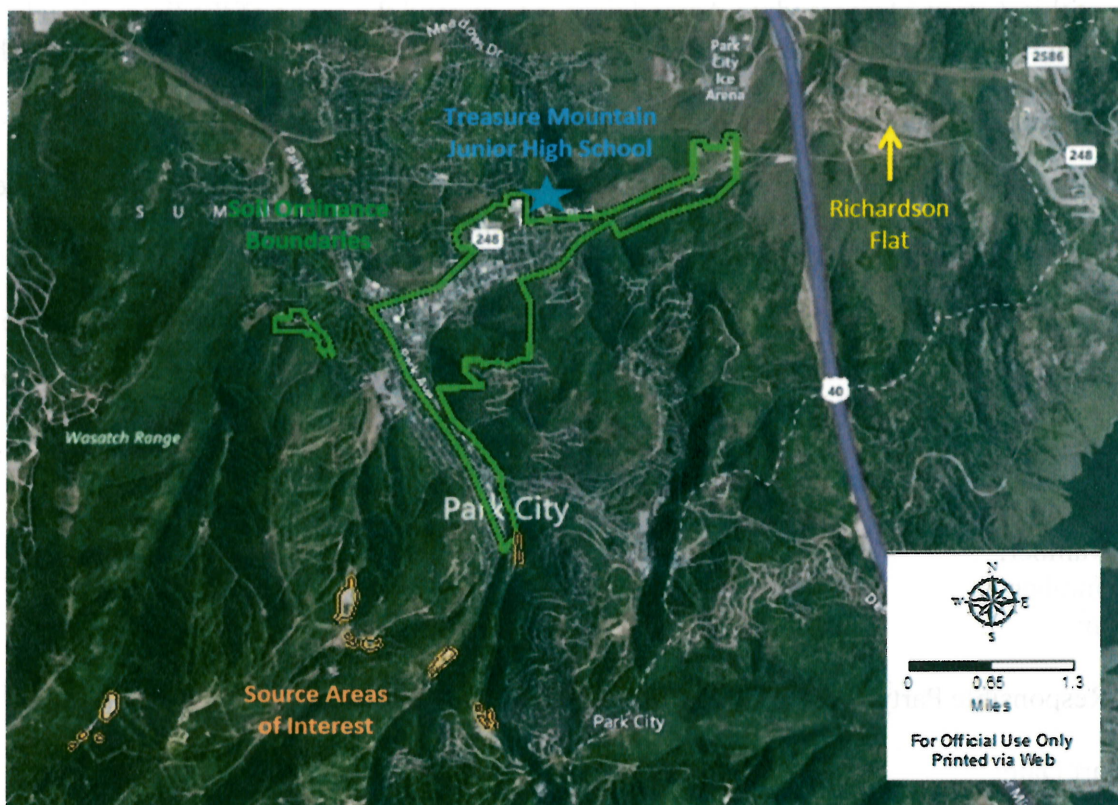
United Park City Mines (UPCM), consistent with an Administrative Order on Consent (AOC) with EPA, is currently constructing erosion control features in the mining district to address the downstream migration of contaminated sediments in several source areas at the Site (Figure 1).

The EPA Site Assessment Program, in consultation with the Utah Department of Environmental Quality (UDEQ) and the Municipality of Park City (Park City) recommended that the EPA Response Unit conduct a removal assessment at the Treasure Mountain Junior High School. Historic aerial images indicate that the school was constructed in an area on the northern perimeter of the Prospector Square tailings deposit (Figure 2).

The Treasure Mountain Junior High School property contains a school building, recreational fields and other school district administrative facilities. The recreational fields are often used by the Park City community for events and tournaments. The Site is not located within Park City's protective municipal Soil Ordinance for Landscaping and the Maintenance of Soil Cover.

The EPA Response Unit obtained results for the concentration of lead in the soil at different depths on the property. These results were gathered by XRF analysis and supported by laboratory confirmation. The results show that the concentrations of lead in the first 6 inches of soil were found to be as high as 19,000 mg/kg (Figure 3). Lead concentrations at depths greater than 6 inches from the surface were also found to be elevated (Figures 4 and 5).

*Figure 1: Areas of Interest at the Site*





*Figure 2: Location of the Treasure Mountain Junior High in relation to historic tailings at Prospector Square*





Figure 3: Soil lead concentrations between 0 and 6 inches below the surface at the Junior High School.

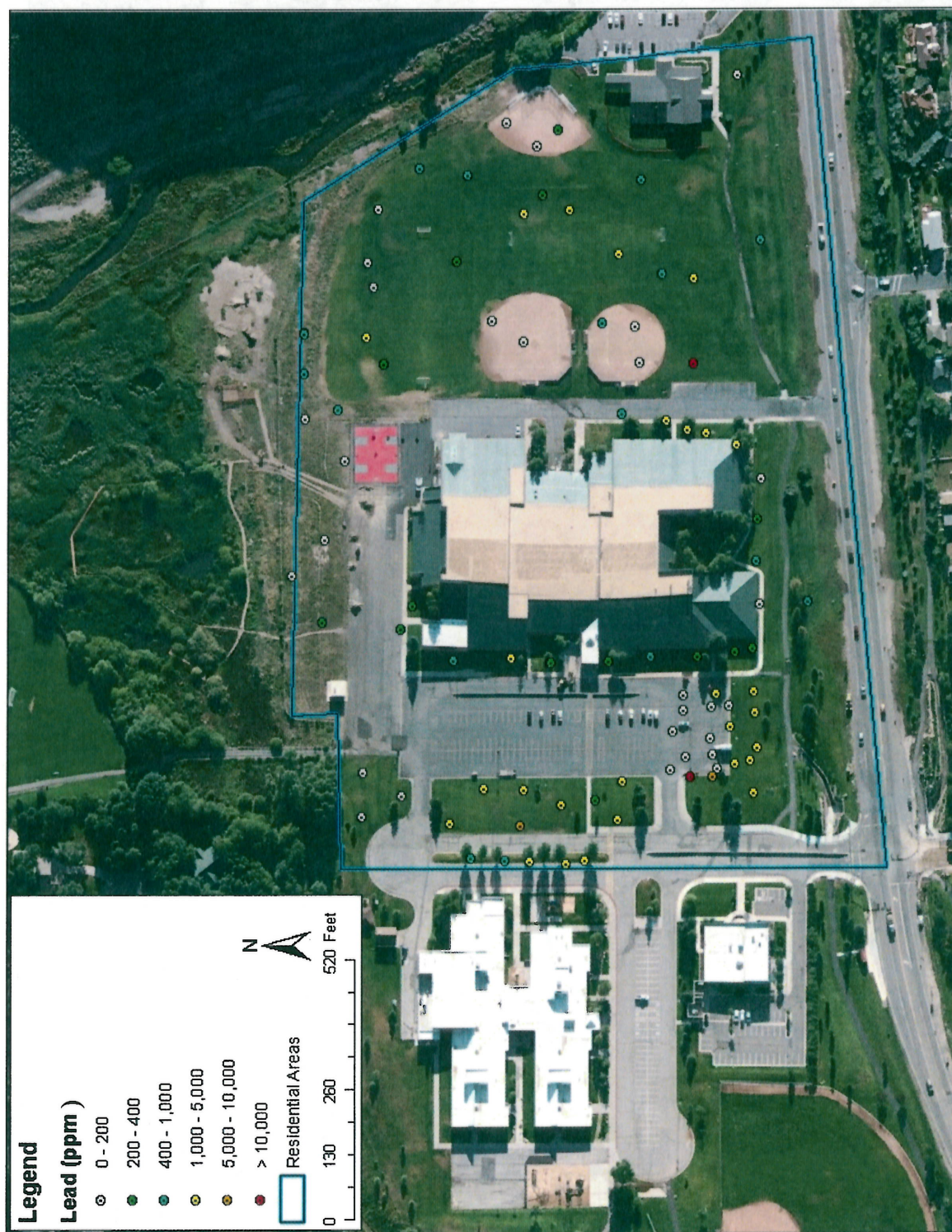




Figure 4: Soil lead concentrations between 6 and 18 inches below the surface at the Junior High School.

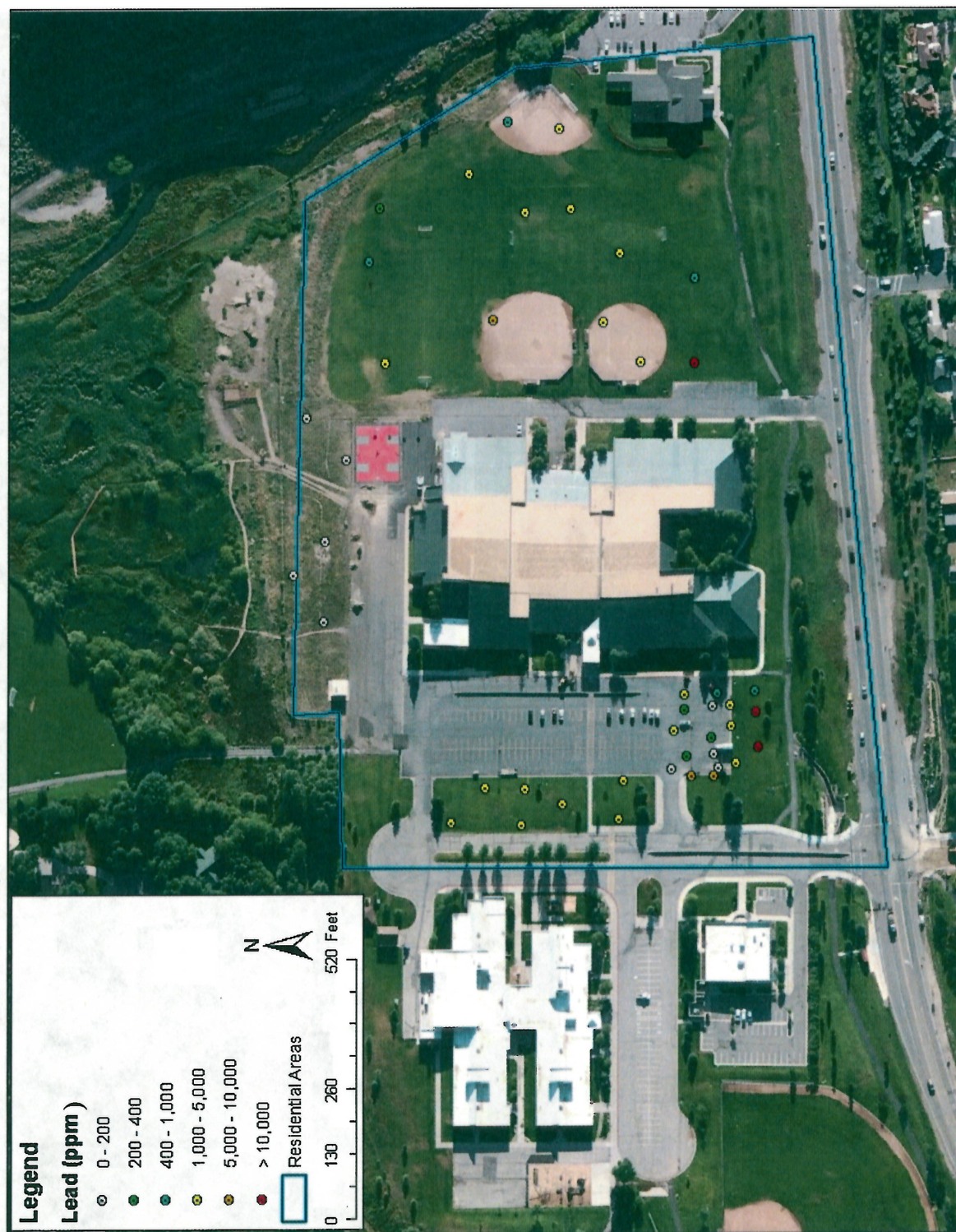




Figure 5: Soil lead concentrations between 18 and 36 inches below the surface at the Junior High School.



### **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Conditions at the Site present a threat to public health and the environment, and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the NCP. EPA has considered all the factors described in 40 CFR 300.415(b)(2) and determined that the following factors apply at the Site.

*(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants or contaminants.*

Contaminated soils exist at the Site in areas that are regularly used by students, grounds keepers and other members of the community.

*(iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.*

The results of EPA's removal assessment show that high levels of contamination exist at or near the surface and that this contamination could migrate during general use, maintenance and/or redevelopment activities.

*(vii) The availability of other appropriate federal or state mechanisms to respond to the release.*

Local and state governments do not have the capability to conduct the action in a timely manner.

### **IV. PROPOSED ACTIONS AND ESTIMATED COSTS**

- A. The Site will be expanded to include Operable Unit 01 to be defined as the Treasure Mountain Junior High School including the recreational fields to the east of the school and the disposal site at Richardson Flat otherwise known as Operable Unit 1 of the Richardson Flat Superfund Site. The Richardson Flat site is currently proposed for inclusion on the NPL.

EPA will bring the school into compliance with the requirements of Park City's Soil Ordinance for Landscaping and the Maintenance of Soil Cover. A 6-inch cover of non-contaminated topsoil will be verified and/or established on the Treasure Mountain Junior High Site and adjacent recreation fields. All disturbed areas will be restored with proper drainage, vegetation and appropriate cover material.

Any soil and/or existing vegetation that is excavated or removed to create this protective cover will be disposed of at Richardson Flats.

Construction activities in this area will occur during the late July and August when school is not in session.

- B. The existing irrigation system will be repaired and/or modified as required and all restored areas will be properly vegetated and otherwise maintained.



**B. Estimated Costs\***

Task	Costs
Existing Budget: project oversight costs.	\$48,000
Additional Costs: Conduct sampling and monitoring as needed at the school. Provide oversight of construction and disposal activities. Document removal activities.	\$10,000
Additional Costs: Construct a 6-inch cap of material that tests below 200 mg/kg. Restore the property.	\$540,000
SUBTOTAL:	\$598,000
Contingency	\$510,000
<b>Total Removal Project Ceiling</b>	<b>\$1,108,000</b>

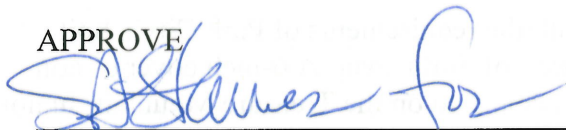
\* EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

**IX. RECOMMENDATIONS**

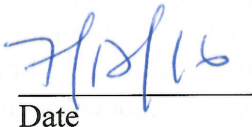
This decision document represents the selected removal action for the Treasure Mountain Junior High Site in Summit County, Utah, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site continue to meet the NCP section 300.415(b) criteria for a removal action and I recommend your approval of the proposed change to the scope of work and project ceiling. The total project ceiling, if approved, will be \$1,108,000 of which \$1,108,000 will come from the regional removal allowance.

APPROVE



Martin Hestmark, Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation



Date

DISAPPROVE

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Martin Hestmark, Assistant Regional Administrator  
Office of Ecosystems Protection and Remediation

\_\_\_\_\_  
Date