

State of Utah

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Department of Environmental Quality

Kimberly D. Shelley Executive Director

DIVISION OF WASTE MANAGEMENT AND RADIATION CONTROL

> Douglas J. Hansen Director

> > February 27, 2024

Daniel Dean Terracon 6949 South High Tech Drive Midvale, UT 84057

RE: Corrective Action Plan – Gordo Property Kearns Boulevard and Richardson Flat Road, Park City, Utah

Dear Mr. Dean:

The Division of Waste Management and Radiation Control (Division) has completed its review of the Corrective Action Plan (CAP), dated February 16, 2024, for the Gordo Property (Site) located at Kearns Boulevard and Richardson Flat Road in Park City, Summit County, Utah.

This CAP details the soil excavation and management, waste characterization, contingency plans, and disposal of impacted fill soils at the Site. The contingency plans include the treatment of impacted fill soils with monocalcium phosphate to stabilize metals contamination and reduce leachability if they fail to meet the toxic characteristic leaching procedure (TCLP) standards. The CAP proposes collecting and re-testing representative five-point composite samples for TCLP analysis of treated soils with a sampling frequency at the same rate proposed for waste characterization for untreated soils – every 5,000 cubic yards. This sampling frequency may or may not be appropriate based on the results of the TCLP analyses. The Division suggests that the frequency of sampling phosphate treated soils (should this be necessary) be discussed and a decision made when TCLP analysis results are available for examination.

The CAP adequately addresses Division requirements and comments and is therefore approved for implementation.

Please provide at least seven days' notice prior to the start of field activities to allow for Division staff participation.

(Over)

DSHW-2024-004739

195 North 1950 West • Salt Lake City, UT Mailing Address: P.O. Box 144880 • Salt Lake City, UT 84114-4880 Telephone (801) 536-0200 • Fax (801) 536-0222 • T.D.D. 711 *www.deq.utah.gov* Printed on 100% recycled paper If you have any questions, please call Karen Wallner at 385-499-0218.

Sincerely,

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Douglas J. Hansen, Director Division of Waste Management and Radiation Control

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c: Phil Bondurant, Health Director, Summit County Health Department Nathan Brooks, Environmental Health Director, Summit County Health Department Ryan Blair, Environmental Regulatory Program Manager, Park City (Email) Daniel Dean, Terracon (Email and Hard Copy)