November 25, 2014
Kleinfelder Project No.: 20150092.001A

Mr. Jim Blankenau
Environmental Regulatory Program Manager
Park City Municipal Corporation
445 Marsac Avenue, P.O. Box 1480
Park City, Utah 84060

SUBJECT: Phase I Environmental Site Assessment
Clark Ranch Property
Summit County Parcel #PP-26, PP-26-A-1, SS-121, and SS-91
Park City, Utah

Dear Mr. Blankenau:

Enclosed is the Phase I Environmental Site Assessment (ESA) report for the above-referenced property. We trust the information presented in this report meets your need at this time. We recommend that the report be read in its entirety for a comprehensive understanding of the items contained therein.

We appreciate the opportunity to provide these services for Park City Municipal Corporation. Should you require additional information, have any questions regarding this report, or wish to discuss the recommendations provided, please contact Ryan Merkley at 801.261.3336.

Sincerely,

KLEINFELDER

Ryan Merkley, PG
Utah Operations Manager

849 West Levoy Drive, Suite 200 Salt Lake City, UT 84123-2964 p | 801.261.3336 f | 801.261.3306

PHASE I ENVIRONMENTAL SITE ASSESSMENT CLARK RANCH PROPERTY SUMMIT COUNTY PARCEL # PP-26, PP-26-A-1, SS-121, and SS-91 PARK CITY, UTAH KLEINFELDER PROJECT NO: 20150092.001A

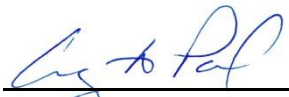
NOVEMBER 25, 2014

A Report Prepared for:

Mr. Jim Blankenau
Environmental Regulatory Program Manager
Park City Municipal Corporation
445 Marsac Avenue, P.O. Box 1480
Park City, Utah 84060

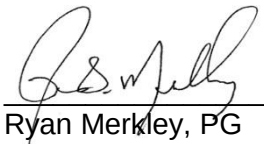
PHASE I ENVIRONMENTAL SITE ASSESSMENT
CLARK RANCH PROPERTY
SUMMIT COUNTY PARCEL #PP-26, PP-26-A-1, SS-121, AND SS-91
PARK CITY, UTAH

Prepared by:



Corey A. Park, PG
Staff Geologist

Reviewed by:



Ryan Merkley, PG
Utah Operations Manager

KLEINFELDER
849 West Levoy Drive, Suite 200
Taylorsville, Utah
Phone: 801.261.3336
Fax: 801.261.3306

November 25, 2014
Kleinfelder Project No.: 20150092.001A

TABLE OF CONTENTS

Section			Page
1	**EXECUTIVE SUMMARY**		**1**
2	**INTRODUCTION**		**5**
	2.1	PURPOSE	5
	2.2	DETAILED SCOPE-OF-SERVICES	6
	2.3	ADDITIONAL SERVICES	8
	2.4	SIGNIFICANT ASSUMPTIONS	8
	2.5	LIMITATIONS AND EXCEPTIONS	8
	2.6	SPECIAL TERMS AND CONDITIONS	9
3	**SITE DESCRIPTION**		**10**
	3.1	LOCATION AND LEGAL DESCRIPTION	10
	3.2	CURRENT/PROPOSED USE OF THE PROPERTY	10
	3.3	DESCRIPTION OF STRUCTURES/IMPROVEMENTS	11
	3.4	CURRENT USES OF ADJOINING PROPERTIES	11
4	**RECORDS REVIEW**		**13**
	4.1	STANDARD ENVIRONMENTAL RECORD SOURCES	13
	4.2	RESULTS OF DATABASE SEARCH	15
		4.2.1 Orphan List	17
	4.3	OTHER RECORDS REVIEWED/AGENCIES CONTACTED	17
	4.4	PHYSICAL SETTING	18
	4.5	USER PROVIDED INFORMATION	19
		4.5.1 Title Records	20
		4.5.2 Environmental Liens and Usage Limitations	20
		4.5.3 Value Reduction	20
		4.5.4 Other Information/Documents Provided	21
5	**HISTORY OF THE SITE**		**22**
	5.1	AERIAL PHOTOGRAPHS	22
	5.2	SANBORN FIRE INSURANCE MAPS	24
	5.3	LOCAL STREET DIRECTORIES	24
	5.4	HISTORICAL TOPOGRAPHIC MAP REVIEW	25
	5.5	BUILDING DEPARTMENT RECORDS	26
	5.6	PREVIOUS ASSESSMENTS	26
6	**SITE RECONNAISSANCE**		**27**
	6.1	METHODOLOGY AND LIMITING CONDITIONS	27
	6.2	GENERAL SITE SETTING	27
	6.3	SITE OBSERVATIONS	28
	6.4	RESULTS OF SITE RECONNAISSANCE	32

7 INTERVIEWS 33
7.1 INTERVIEW WITH Key Site Contact 33
7.2 INTERVIEW WITH OCCUPANTS 33
7.3 INTERVIEWS WITH LOCAL GOVERNMENT OFFICIALS 33
7.4 INTERVIEW WITH CLIENT/OTHERS 33

8 SOIL SCREENING AND SAMPLING 34
8.1 XRF SOIL SCREENING 34

9 EVALUATION 36
9.1 BACKGROUND 36
9.2 FINDINGS, OPINIONS AND CONCLUSIONS 36
9.3 DEVIATIONS AND ADDITIONAL SERVICES 37
9.4 RECOMMENDATIONS 37
9.5 DATA GAPS 38

10 REFERENCES 39

TABLES
3-1 Location and Legal Description
3-2 Current/Proposed Uses
3-3 Structures/Improvements
3-4 Adjoining Properties
4-1 Facilities Selected for Evaluation
4-2 Physical Setting
4-3 Regional Geology and Hydrogeology
4-4 Owner/Occupant Information
5-1 Historical Sources
5-2 Historical Aerial Photographs Reviewed
5-3 Historical Topographic Maps Reviewed
6-1 Site Observations

FIGURES
1 Site Location Map
2 Site Vicinity Map
3 Site Lead Impacted Soil Sampling Map
4 - 6 Site Photographs

APPENDICES
A Qualifications of Environmental Professionals
B Regulatory Agency Database Report
C Interview and Regulatory Agency Documentation
D Historical Research Documentation:
Historical Aerial Photographs
Sanborn Map Search Results
City Directory Search Results
Historical Topographic Maps
E Lead Impacted Soil Sampling Documentation

PHASE I ENVIRONMENTAL
SITE ASSESSMENT
CLARK RANCH PROPERTY
SUMMIT COUNTY PARCEL # PP-26, PP-26-A-1, SS-121, AND SS-91
PARK CITY, UTAH

1 EXECUTIVE SUMMARY

A Phase I Environmental Site Assessment (ESA) was performed by Kleinfelder for Park City Municipal Corporation (User / Client), for the parcels of land identified by the Summit County Assessor as parcel numbers PP-26, PP-26-A-1, SS-121, and SS-91 in Park City, Utah (referred to herein as the "Site"). The Site consists of approximately 341 acres of hillside land located on the east and west sides of Highway 40 approximately 0.25 miles south of Richardson Flat Road in the area referred to as the Clark Ranch Property. Kleinfelder understands that the Site is planned to be acquired by Park City for open space preservation with possible minimal public facility use. This report is intended to provide a preliminary screening of the Site.

This report was prepared consistent with the guidelines set forth in ASTM International (ASTM, formerly known as the American Society for Testing and Materials) Designation E1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (the "Standard Practice"), and the All Appropriate Inquiry (AAI) section of the Small Business Liability Relief and Revitalization Act (the Federal Brownfields Law). The Phase I ESA findings include:

The Site consists of approximately 341 acres of land. In general, the Site consists of undulating hills with intermittent drainages covered in sage brush and other naturally occurring grasses. Some trees including scrub oak and quaking aspen were observed on the far west side of the Site. Improvements on the Site consist of barbed wire fencing, storm water drainage improvements (on the west side of Highway 40), unimproved roadways, and two concrete pads (on the east side of the Highway 40). During our October 14, 15, and 31, 2014 Site visits, Kleinfelder traversed a majority of the Site and Site perimeter. Kleinfelder observed the

presence of two concrete pads on the east side of the Site. In the proximity of the observed concrete pads, Kleinfelder personnel also observed a non-regulated groundwater well, garbage pit, and large amount of broken glass and crushed metal drums ranging in size from what appeared to be 5 to 25 gallons. The observed glass and garbage was concentrated in the area of the concrete pads, garbage pit, and drainages leading from the concrete pads towards the northeast.

Kleinfelder researched the history of the Site back to 1938 using historical aerial photographs. With the exception of a structure in the area of the observed concrete pads, the Site appears as undeveloped native land in 1938. Few changes are observed on the Site from 1938 to 2013. Changes include the division of the Site due to the development of Highway 40 first observed in 1993. Based on our conversations with Park City personnel and others familiar with the Site, we understand that a dairy farm was operated on the Site and may be associated with the observed concrete pads.

The Site is located approximately 800 feet south of the Richardson Flat Tailings facility, a Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) facility. This facility includes impacted soils from historical mining activities in the area and includes the potential to impact the Site through air transmitted deposits of heavy metals. These metals include arsenic and lead. The west side of the Site is bordered on the north by the Park City Heights Voluntary Cleanup Program (VCP) facility. Identified lead impacts to soil from irrigation activities were identified at this facility in a delineated irrigation canal and surficial soils across the facility boundaries. The facility is currently being developed and impacted soils are being removed from the Site and transported to approved stockpile areas.

During our investigation and discussions with Park City personnel it was determined that a drainage from the canal leading to Richardson Flats may be present on the Site. The canal was first identified as part of the Park City Heights VCP, but has not been delineated on the Site.

Kleinfelder and Park City personnel visited the Site on three occasions to assess potential soil impacts to the Site within this potential drainage. Kleinfelder personnel used an X-ray Fluorescent (XRF) to assess lead impacts at the Site. Additionally, representative soil samples were collected from select sample locations and analyzed for lead impacts to compare to collected XRF readings. Lead impacts to surficial soil were identified at the Site in drainages

leading from the east side of highway 40 and in drainages leading from the concrete pad area. Eleven XRF readings and nine analyzed soil samples exceeded the United States Environmental Protection Agency (EPA) established May 2014 Regional Screening Level (RSL) for lead in residential soils of 400 milligrams per kilogram. The results of our sampling and analysis are summarized in Table 1 and depicted on Figure 3.

Kleinfelder's Phase I ESA identified three Recognized Environmental Conditions (REC) for the Site.

- The Site is located directly south of the Richardson Flats Tailings facility; therefore, soils on the Site may have become impacted by air transported concentrations of heavy metals.
- The Site contained two concrete pads that are reportedly associated with a former dairy farm operation. Concentrated debris including glass and steel drums were observed in a garbage pit and within the drainage leading to the northeast. Additionally, a groundwater well was observed near the concrete pads. This area is considered an REC due to potential impacts from burned and buried debris in the garbage pit and potential impacts to groundwater through the groundwater well.
- Lead impacted soils were identified at concentrations above EPA established clean-up levels in soil at the Site. The identified soil impacts may be associated with impacted water diverted from the irrigation canal identified within the Park City Heights VCP or from air transmitted deposits from the Richardson Flat tailings or activities related to the concrete pads located on the Site.

Kleinfelder's Phase I ESA did not reveal evidence of Controlled RECs (CRECs) or Historical RECs for the Site.

Based on the findings presented in this report, Kleinfelder notes and recommends the following actions or responsibilities associated with future property ownership:

- When disturbing and/or removing soil from the Site during development activities, Kleinfelder recommends properly characterizing soils for lead impacts as required by appropriate regulating entities or disposal facilities. If the sampling identifies that the

impacted soils are at concentrations which classify them as “hazardous” the soils should be handled, transported, and disposed of appropriately.

- If the Site is intended to remain undeveloped land, education of the public concerning the historic use of the land and potential environmental impacts, may be warranted. This could be accomplished through many ways such as public outreach programs or visible signage in access areas to the property providing information regarding impacts that may be present on the Site. These programs should be discussed with Park City personnel or other properly trained entities on the best methods to reach the public.
- Potential impacts from burned and buried debris in the area of the concrete pads on the Site should be investigated prior to future development. The non-registered groundwater well should be abandoned according to regulatory standards.

Deviations from the Phase I ESA Standard are discussed in Chapter 8 of this report. This report is subject to the limitations in Section 2.5.

2 INTRODUCTION

This report is a summary of work performed using the guidelines set forth in ASTM Designation E 1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (the ASTM Standard) and All Appropriate Inquiry (AAI) standards of the Small Business Liability and Revitalization Act (the "Brownfields Law"). This report also generally conforms to the ASTM Standard's suggested table of contents. Minor format modifications have been made to the ASTM Standard's suggested table of contents to assist in better reading and understanding the report findings.

2.1 PURPOSE

The purpose of this Phase I ESA is to identify, to the extent feasible pursuant to the scope of services defined in our Proposal No. SLC14P0175, dated March 14, 2014 and limitations discussed in this report, recognized environmental conditions (RECs). As defined in the ASTM Standard, a REC is:

> *The presence or likely presence of any hazardous substances or petroleum products in, on or at a property: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.*

As defined in the ASTM Standard, a *de minimis* condition is:

> *A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.*

ASTM Standard E 1527-13 also introduces the designation of Controlled REC (CREC). As defined in the ASTM Standard a CREC is:

A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

This report also discusses *historical RECs* (HRECs), which are defined in the ASTM Standard as:

A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to environmental controls.

The final decision on whether a past release is an HREC rests with the environmental professional (EP), and will be influenced by the current impact past release to the Site.

This report describes Kleinfelder's assessment methodology and documents our findings, subject to the limitations presented in Section 2.5 of this report.

Kleinfelder professionals conducting this site assessment included Corey Park, who conducted the Site reconnaissance, is the primary author of this report, and is an EP. Other EPs include Ryan Merkley. Resumes of EPs are available from Kleinfelder upon request.

2.2 DETAILED SCOPE-OF-SERVICES

The following sections describe Kleinfelder's work scope:

- Section 2, **Introduction**, includes a discussion of the purpose/reason for performing the Phase I ESA, additional services requested by the Client (i.e., an evaluation of business environmental risk factors associated with the Site), significant assumptions (i.e., property boundaries if not marked in the field), limitations, exceptions, special terms and conditions (i.e., contractual), and user reliance parameters.

- Section 3, **Site Description**, is a compilation of information concerning the Site location, legal description (if provided), current and proposed use of the Site, a description of structures and improvements on Site at the time of Kleinfelder's assessment, and adjoining property use. Physical setting sources (including topography, soil and groundwater conditions) and typical Client-provided records (i.e., title records, environmental liens, specialized knowledge, valuation reduction for environmental issues, and owner, property manager, and occupant information) are also summarized in this section, if provided.
- Section 4, **Records Review**, is a compilation of Kleinfelder's review of several databases available from Federal, State, and local regulatory agencies regarding hazardous substance use, storage, or disposal at the subject site; and for off-site facilities within the search distance specified in the ASTM Standard. Records provided by the Client are summarized and copies of relevant documents are included in the appendices of this report. Additional agency interviews may be made and documented, as applicable. Other interviews with people knowledgeable about the Site (including the Client) are included in Section 7.
- Section 5, **History of the Site**, summarizes the history of the Site and adjoining properties. Site history is based on various sources which may include: a review of historical aerial photographs, Sanborn Fire Insurance Maps, city or suburban directories, historical topographic maps, building department records, and results of previous site assessments.
- Section 6, **Site Reconnaissance**, includes a summary of Kleinfelder's observations during the site reconnaissance. The methodologies used and limiting conditions are described.
- Section 7, **Interviews**, is a summary of telephone and personal interviews conducted with "Key Site Managers" that may include the owner/manager of the facility, occupants/tenants, and the Client.
- Section 8, **Evaluation**, is a presentation of Kleinfelder's findings and opinions regarding the information in Sections 3 through 8, and presents our conclusions regarding the presence of RECs connected with the site, and recommendations as required by the Client.
- Section 9, **References**, is a summary of not otherwise documented resources used to compile this report. Additional resources may be documented in the text of the report.

Pertinent documentation regarding the Site is included in appendices of this report.

2.3 ADDITIONAL SERVICES

An evaluation of selected business environmental risks associated with the Site have not been included in Kleinfelder's scope of work. Common ASTM Standard non-scope considerations include: asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historical resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality/vapor intrusion assessments, and high voltage power lines. ASTM Standard non-scope considerations are not included in this report.

2.4 SIGNIFICANT ASSUMPTIONS

The findings in this report reflect our observations based on visual inspections, examination of available public records, and interviews with individuals associated with or potentially having useful knowledge of the Site. The passage of time, manifestation of latent conditions, or occurrence of future events may require further study at the Site; analysis of the data; and reevaluation of the findings, observations, and/or conclusions in the report. Further, this report includes unverified information supplied to Kleinfelder by third-party sources. Kleinfelder does not guarantee the accuracy of the information supplied by its sources, but reserves the right to rely on this information in formulating a professional opinion on the potential for contamination at the Site. Kleinfelder also assumes the Client provided all applicable and available environmental records and specialized knowledge regarding the Site. Kleinfelder has not made other significant assumptions during the performance of this Phase I ESA.

2.5 LIMITATIONS AND EXCEPTIONS

Phase I ESAs are non-comprehensive by nature and may not identify all environmental problems, and will not eliminate all risk. This report is a qualitative assessment. Kleinfelder offers a range of investigative and engineering services to suit the needs of our clients, including more quantitative investigations. Although risk can never be eliminated, more detailed and extensive investigations yield more information, which may help the Client understand and better manage risks. Since such detailed services involve greater expense, we ask our clients to participate in identifying the level of service, which will provide them with an acceptable level of

risk. Please contact the signatories of this report if you would like to discuss this issue of risk further.

Kleinfelder performed this Phase I ESA in consistent with the guidelines set forth in the ASTM Standard, and the proposed scope subsequently approved by our Client. No warranty, either expressed or implied, is made. Environmental issues not specifically addressed in this report were beyond the scope of our services and not included in our evaluation.

This report may be used only by the Client and only for the purposes stated within a reasonable time from its issuance, *but in no event later than one year from the date of the site reconnaissance or environmental database report, whichever occurs first (August 25, 2014).* Land or facility use, on- and off-Site conditions, regulations, or other factors may change over time, and additional work may be required with the passage of time. Since Site activities and regulations beyond our control could change at any time after the completion of this report, our observations, findings, and opinions can be considered valid only as of the date of the Site visit. *Portions of this report should not be relied upon after 180 days from the date of its issuance (ASTM Standard, Section 4.6).* Any party other than the Client who wishes to use this report shall notify Kleinfelder of such intended use. Based on the intended use of the report, Kleinfelder may require that additional work be performed and that an updated report be issued. Non-compliance with any of these requirements by the Client or anyone else will release Kleinfelder from any liability resulting from the use of this report by any unauthorized party, and Client agrees to defend, indemnify, and hold harmless Kleinfelder from any claim or liability associated with such unauthorized use or non-compliance.

2.6 SPECIAL TERMS AND CONDITIONS

No special terms and conditions in addition to those discussed previously were agreed to either by the Client or Kleinfelder.

3 SITE DESCRIPTION

The Site description is presented in this section and depicts the condition of the Site at the time of the Phase I ESA. The Site location is shown on Figure 1. Tables 3-1 through 3-4 summarize the physical characteristics of the Site and adjoining properties.

3.1 LOCATION AND LEGAL DESCRIPTION

The information presented in Table 3-1 describes the physical location and legal description of the Site. This information was obtained from our review of various maps (such as topographic maps and tax assessor maps), aerial photographs, public records at city and/or county offices, interviews, and/or information provided by the Client.

TABLE 3-1

LOCATION AND LEGAL DESCRIPTION

Parameter	Information/Comments
ADDRESS	None
LOCATION	Approximately 0.20-miles south of Richardson Flat Road adjoining the east and west sides of Highway 40.
TOPOGRAPHIC MAP AND COORDINATES	The Site is located in the southeast corner Section 2 and northeast corner of Section 11 of Township 2 South and Range 4 East of the Salt Lake City Base and Meridian.
ASSESSOR'S PARCEL No(s).	PP-26, PP-26-A-1, SS-121, and SS-91
ACREAGE	Approximately 341
ZONING	Unzoned parcel

3.2 CURRENT/PROPOSED USE OF THE PROPERTY

The Site consists of an east and west portion divided by Highway 40. The east side of the Site consists of undeveloped native land that includes unimproved dirt roadways, two concrete pads and barbed wire fencing. The west side of the Site consists of an unimproved dirt road and improved Site surface water runoff along Highway 40. Land use in the general vicinity appeared

to be a mixture of residential (being developed) and range land at the time of Kleinfelder's assessment. Current and proposed uses are described in Table 3-2.

TABLE 3-2

CURRENT/PROPOSED USES

Parameter	General Observations
CURRENT USE	Undeveloped hillside
PROPOSED USE	Open Space

3.3 DESCRIPTION OF STRUCTURES/IMPROVEMENTS

Structures and/or improvements observed on Site at the time of Kleinfelder's site reconnaissance are described in Table 3-3.

TABLE 3-3

STRUCTURES/IMPROVEMENTS

Parameter	General Observations
STRUCTURES	None
IMPROVEMENTS	Unimproved vehicle access roads, barbed wire fences, a non-registered water well, and improved surface water drainage along Highway 40.

3.4 CURRENT USES OF ADJOINING PROPERTIES

Kleinfelder performed a brief drive-by survey of the properties immediately adjoining to the Site on October 14, 15, and 31, 2014. A summary of the surrounding properties is presented in Table 3-4.

TABLE 3-4

ADJOINIING PROPERTIES

Direction	Land Use Description
NORTH	Range land followed by Richardson Flat Road followed by Richardson Flat Tailings on the east side of the Site and residential construction on the west side of the Site.
SOUTH	Undeveloped native hillside.
EAST	Undeveloped native hillside.
WEST	Undeveloped native hillside followed by residential development.

Hazardous materials and petroleum products were not observed to be stored on the undeveloped properties and/or outside the buildings located adjoining the Site.

4 RECORDS REVIEW

4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

The purpose of the records review is to obtain and review records that would help to evaluate RECs of potential concern in connection with the subject site and bordering properties. Federal, state and local regulatory agencies publish databases or "lists" of businesses and properties that handle hazardous materials or hazardous waste, or are the known location of a release of hazardous substances to soil and/or groundwater. These databases are available for review and/or purchase at the regulatory agencies, or the information may be obtained through a commercial database service. Kleinfelder contracted a commercial database service, Environmental Data Resources, Inc. (EDR), of Milford, Connecticut to perform the government database search for listings within the appropriate ASTM minimum search distance of the Site. Kleinfelder provided EDR with a Site map to incorporate the search distances from the Site boundary. Included in the EDR Radius Map™ Report with GeoCheck® is a listing of specific databases outlined by the ASTM Standard. If required, the search distances included an extended radius from those specified by ASTM. A listing of the search distances, databases evaluated, dates the databases were last updated, and types of information contained in each database are included in the regulatory database search provided as Appendix B to this report.

EDR utilizes a geographical information system to plot the locations of reported spills, leaks, incidents, etc. Kleinfelder reviews this information to help establish if the Site, or nearby properties, have been included in the noted databases and lists. Each of the listings was reviewed to assess whether the corresponding property details included in the EDR report revealed a potential environmental impact to the Site. In order to aid in assessing which of the regulatory-listed facilities would likely impact the Site, Kleinfelder used an estimated northeast regional groundwater flow direction to assess the hydrologic location of the facilities with respect to the Site. The facilities were classified as either up groundwater-gradient, down groundwater-gradient, or cross groundwater-gradient with respect to the Site location.

Two listings on the EDR database were found not to have the potential to impact the Site based on the following, or a combination thereof:

- The listed property was located at a distance where the facility would be unlikely to impact the Site based on Kleinfelder's evaluation of the relevant data in the EDR report and knowledge of the Site vicinity.
- The listed property was located in a down-gradient or cross-gradient direction from the Site, based on the anticipated direction of groundwater flow at the property being evaluated, and is located at a distance that would be unlikely to impact the Site. Note that groundwater flow direction is variable in the vicinity of the Site and determinations as to down- or cross-gradient direction were made only when groundwater flow direction was available for a specific property.
- The listed property was identified in the underground storage tank (UST) or Small Quantity Generator (SQG) databases but is not identified on or immediately adjoining the Site. The property was not listed in other databases that reported a release of a hazardous substance or petroleum product and/or was not listed as having environmental violations. The listing of a facility on these databases alone is not indicative of an unauthorized release.
- The listing for the facility suggested a short-term release had occurred (i.e., from incidental traffic accidents, or chemicals from illegal drug labs found at residences) with associated response actions completed.
- The quantity of the hazardous substances or petroleum product released from an off-property facility was not considered to have resulted in contamination above the most stringent criteria that would require regulatory action. Therefore, no impact to the Site in anticipated.
- The listed property record indicates that the property was characterized, the reported release affected soil only, the listed property was not on or adjacent to the Site, and the release was not recognized as indicative of area-wide conditions or was characterized as a soil removal action only.
- The listed property record indicates that contamination on the property is limited to relatively non-mobile contaminants, including polyaromatic hydrocarbons (PAHs) and metals, in soil only, on a non-adjacent property.
- The listed property record indicates that the case has been closed to the satisfaction of the designated lead regulatory agency and residual contamination, if present, is not considered likely to affect the Site based on one or more of the criteria mentioned in the bulleted items above (referred in the ASTM Standard as an HREC).

Based on these criteria that indicate no material threat of a release that affected the Site and/or no release that could require future regulatory agency oversight, these listings were not evaluated further and are not discussed in the following sections.

4.2 RESULTS OF DATABASE SEARCH

The remaining listed properties were reviewed to assess whether properties may have had environmental releases, which may have resulted in RECs in relation to the Site. The listed properties with a reported release were further assessed. Based on agency files available through the State of Utah Department of Environmental Quality (UDEQ) and other relevant regulatory agencies, further evaluation was made as to whether the listed release represents a potential impact to the Site. Reported regulatory case numbers are included in the comments, if available. Facilities evaluated at this level are summarized on Table 4-1 as follows:

TABLE 4-1
FACILITIES SELECTED FOR EVALUATION

EDR MAP ID	FACILITY OR SITE NAME	FACILITY OR SITE ADDRESS	PROXIMITY TO SITE	DATABASE SOURCE(S)	POTENTIAL REC	COMMENTS
Not Issued	Richardson Flat Tailings	NW ¼ Sec. 1 T2S R4E	835 feet north of the Site	Proposed NPL, CERCLIS, US ENG Controls, US INST Control, ROD, PRP	Yes	See detailed summary below
1	Phoston Siding Site	5 Mile East of Park City	0.31 miles north of Site	LUST, UST	No	See detailed summary below

RICHARDSON FLAT TAILINGS

The EDR report identified the Richardson Flat Tailings facility, located on Richardson Flat Road approximately 835 feet north and down groundwater-gradient of the Site. Based on the information provided by EDR, the Richardson Flat Tailings facility covers approximately 650 acres and includes up to 160 acres containing a minimum of 2-million tons of tailings from historical mining operations in the Park City area.

Based on the reports reviewed, a preliminary assessment was conducted under CERCLIS in 1984, with proposal to assign the facility to the National Priorities List first occurring in 1988. Impacts at the facility include metals in airborne deposits and surface water pathways. Metals include copper, zinc, mercury, arsenic, cadmium, chromium, lead, and silver.

Management of the Richardson Flat Tailings facility is ongoing. Potential impacts have occurred or may have occurred on adjoining properties due to tailing surface water runoff and windblown deposits. It is possible that the Site has been impacted by this facility.

PHOSTON SIDING SITE

The Phoston Siding Site leaking underground storage tank (LUST) facility is located approximately 0.31 miles to the north and down groundwater-gradient from the Site. According to the EDR report, a release identified by the Utah Department of Environmental Quality (UDEQ) by release identification JBJ occurred on September 2, 1993 and was closed by the UDEQ on April 16, 1996. Kleinfelder reviewed the UDEQ online LUST files on the UDEQ electronic document management system (EDMS) database. According to the reviewed documents, a 1,000 gallon UST was removed from the ground at the facility without documentation in 1989. Additional investigations after the removal of the UST were conducted and impacts to the soil underlying the former UST were identified. However, the reported impacts to soil were below regulatory levels and groundwater was not impacted.

Based on the review of this LUST file from UDEQ, Kleinfelder does not expect that the Site has been environmentally impacted by this LUST facility.

4.2.1 Orphan List

Sites not plotted by EDR due to poor or inadequate address information are referred to as orphan sites. There are 19 unmapped sites in the EDR report. The orphan summary/unmapped sites report was reviewed to assess the potential for off-Site properties that might pose a REC to the Site. Based on our review, these orphan sites appear to be in other databases discussed previously, outside the ASTM search distances, and/or located hydrogeologically down- or cross-gradient relative to the Site, and in our opinion they do not represent RECs to the Site.

4.3 OTHER RECORDS REVIEWED/AGENCIES CONTACTED

The following additional sources of environmental records were reviewed during this Phase I ESA for the purposes of meeting the ASTM Standard. Local regulatory agencies were contacted for reasonably ascertainable and practically reviewable documentation regarding RECs present at the Site and adjoining facilities at the time of the Site reconnaissance. Summaries of additional interviews with local regulatory agency representatives are included in Section 7 of this report (with interview documentation included in Appendix C). The following agencies were contacted for documentation:

Summit County Environmental Health Department

Kleinfelder contacted the Summit County Health Department on November 13, 2014 to identify if they have records on file associated with the use, storage, release, and/or disposal of hazardous waste and/or petroleum products on the Site. According to Brent Ovard with the Summit County Health Department, no violations or complaints have been submitted to the Summit County Health Department for the Site and no records associated with the Site are on file at the Summit County Health Department.

Park City Fire District

Kleinfelder contacted the Park City Fire District on November 13, 2014 to identify if they have records on file for permits related to underground storage tanks and their associated equipment or for responses related to petroleum or hazardous materials spills that have occurred on the Site. According to Assistant Fire Chief Scott Adams, the Park City Fire District records are organized and filed by address and therefore, there would be no records on file for the Site.

4.4 PHYSICAL SETTING

Table 4-2 presents information about the physical setting of the Site. This information was obtained from published maps and information provided by EDR.

TABLE 4-2

PHYSICAL SETTING

Data	General Information
TOPOGRAPHY	Based on a review of the United States Geological Survey (USGS) Park City East, 7.5-Minute Series (Topographic) Quadrangle Map dated 1999, the Site elevation ranges from approximately 7,120 feet above mean sea level (msl) to 6,600 feet above msl. The topographic relief in the Site vicinity slopes from the south to the northeast toward Richardson Flat.
SOIL TYPE	The EDR report describes the soil on the Site as Yeates Hollow, a very stoney loam. This soil is classified as a Class C with very slow infiltration rates and with layers impeding downward movement of water.
BEDROCK TYPE	Bedrock in the vicinity of the Site consists of Triassic aged sedimentary shale and sandstone and Tertiary aged volcanic tuff and brecciated flow deposits.
OIL AND GAS WELLS	According to the EDR database search report (EDR, 2014a), no oil or gas wells are located in the vicinity of the Site.

Information about the regional geology is presented in Table 4-3. This information was obtained from published data and maps, interviews with public agencies, and/or from previous investigations conducted by Kleinfelder in the vicinity of the Site.

TABLE 4-3

REGIONAL GEOLOGY AND HYDROGEOLOGY

Physical Parameter	Information/Comments
REGIONAL PHYSIOGRAPHY AND GEOLOGY	The Site is located within the Wasatch Hinterlands, which is a transitional region between the Great Basin and the Colorado Plateau (Bryant, 1990).
DEPTH OF REGIONAL GROUNDWATER AND DIRECTION OF ANTICIPATED FLOW [1]	According to information from reports reviewed on the UDEQ EDMS database for regulatory sites in the general vicinity of the Site, depth to groundwater ranges from just below the ground surface to approximately 300 feet below ground surface (bgs) to the south of the Site. However, due to the nature of the Site consisting of hillside with significant topographic relief, depth to groundwater is likely much deeper within the southern boundaries of the Site.
FLOOD ZONE DESIGNATION	According to the Flood Insurance Rate Map (FIRM) Map Number 49043C, the Site is located in a Zone X, outside of the 500 year and 100 year floodplain.

[1] Groundwater flow direction is based on regional information sources. Site-specific conditions may vary due to a variety of factors including geologic anomalies, utilities, nearby pumping wells (if present), and other developments.

4.5 USER PROVIDED INFORMATION

According to the Client, the purpose for performing this Phase I ESA is to satisfy the requirements for due diligence in association with purchase of the Site. Information regarding the current owners/occupants of the Site is summarized in Table 4-4.

TABLE 4-4

OWNER / OCCUPANT INFORMATION

Entity	Name
OWNER	Florence J Gillmor
OCCUPANT(S)	None

Summaries of interviews of key individuals with knowledge of the Site ("Key Site Managers") are provided in Section 7. The following sections present information provided to Kleinfelder by the Client.

4.5.1 Title Records

A chain-of-title report was not provided by the Client. Therefore, a review of a chain-of-title report was not performed as part of this Phase I ESA.

4.5.2 Environmental Liens and Usage Limitations

According to information provided in EDR's regulatory agency database search report (EDR, 2014a), there are no liens pertaining to the Site listed in the Federal Superfund Liens List maintained by US EPA, and no known recorded land-use environmental deed restrictions pertaining to the Site listed in the State Liens Database.

4.5.3 Value Reduction

As part of the ASTM Designation E 1527-13 process, information is to be gathered regarding the prospective purchase price of the Site relative to its fair market value. If there appears to be a value reduction, that reduction must be identified with respect to whether the difference could be attributed to environmental degradation of the property. Kleinfelder submitted a questionnaire to the Client that included a question about the prospective purchase price of the Site relative to its fair market value. Mr. Heinrich Deters of Park City Municipal Corporation informed Kleinfelder that the purchase price reflects fair market value for the land in question and in comparison to similar properties in the area. No liens or other environmental controls are currently in place on the Site or impact the value of the Site. A copy of the completed questionnaire is provided in Appendix C.

4.5.4 Other Information/Documents Provided

With the exception of supporting documentation related to the Richardson Flat Tailing facility and Park City Height VCP, no additional information or documents were provided to Kleinfelder for review.

5 HISTORY OF THE SITE

The history of the Site was researched to identify obvious uses. Historical land use was researched to the first developed use, or back to 1940, whichever is earlier or readily available. Table 5-1 summarizes the availability of information reviewed during this assessment.

TABLE 5-1
HISTORICAL SOURCES

Source	Years Reviewed	Source / Availability
AERIAL PHOTOGRAPHS	1938, 1953, 1981, 1987, 1993, 1997, 2002-2004, 2006, 2008- 2011, and 2013	EDR, 2014b, Client Provided, and Google Earth
SANBORN FIRE INSURANCE MAPS	Not available	EDR, 2014c
CITY DIRECTORIES	Not Available	Not Available
HISTORICAL TOPOGRAPHIC MAP REPORT	1895, 1903, 1955 and 1999	EDR, 2014d
PREVIOUS ASSESSMENT(S)	Not Provided	Not Available

5.1 AERIAL PHOTOGRAPHS

A review of historical aerial photography may indicate past activities at a Site that may not be documented by other means, or observed during a site visit. The effectiveness of this technique depends on the scale and quality of the photographs and the available coverage. Aerial photographs were obtained from several historical photograph collections through EDR (EDR, 2014b) as well as from the Client and Google Earth. Aerial photographs spanning a period of 75 years were available during the frame that this report was being prepared. A tabulation of select aerial photographs reviewed is presented in Table 5-2. Copies of the EDR reviewed aerial photographs are included in Appendix D.

TABLE 5-2

HISTORICAL AERIAL PHOTOGRAPHS REVIEWED

Year	Scale	Observations
1938	**Not Provided**	**Site:** With the exception of an access road leading to a structure in the approximate area of the observed concrete pads on the Site (see Section 6.1) the Site consists of undeveloped native land. **Surrounding Area:** The area to the north of the Site across Richardson Flat Road consists of tailings areas associated with mining operations located in Park City. The area to the east, south and west of the Site is undeveloped native land.
1953	**1"=750'**	**Site:** With the exception of the structure observed in the 1938 aerial photograph, no apparent significant changes from the previous photograph are noted. **Surrounding Area:** No apparent significant changes from the previous photograph.
1981	**1"=500'**	**Site:** On the east side of the Site, a linear feature running northwest to southeast is observed. The structure first observed in the 1938 aerial photograph is no longer visible but disturbances observed as white rectangular features are visible in the approximate area of observed concrete pads (see Section 6). **Surrounding Area:** No apparent significant changes from the previous photograph.
1987	**1"=750'**	**Site:** No apparent significant changes from the previous photograph. **Surrounding Area:** No apparent significant changes from the previous photograph.

TABLE 5-2 (cont.)

HISTORICAL AERIAL PHOTOGRAPHS REVIEWED

Year	Scale	Observations
1993	**1"=500'**	**Site:** With the exception of the Highway 40 alignment being first observed dividing the Site into an east and west portion and improved surface water drainage first observed on the west portion of the Site, no apparent significant changes from the previous photograph are observed. **Surrounding Area:** No apparent significant changes from the previous photograph.
2002-2013	**Various**	**Site:** No apparent significant changes from the previous photograph. **Surrounding Area:** No apparent significant changes from the previous photograph.

Note: Aerial photographs only provide information concerning indications of land use, and no conclusions regarding the release of hazardous substances or petroleum products can be drawn from the review of photographs alone.

5.2 SANBORN FIRE INSURANCE MAPS

Sanborn Fire Insurance Maps provide historical land use information for some metropolitan areas and small, established towns. Kleinfelder requested EDR to search its library of Sanborn Fire Insurance Maps for maps of the Site. EDR responded that Sanborn Fire Insurance Maps were not available for the Site (EDR, 2014c).

5.3 LOCAL STREET DIRECTORIES

The EDR City-Directory Abstract Report provides the names of site occupants, located by address, for each year published and are utilized to help assess past uses of a property. Based on the Site consisting of a portion of undeveloped hillside, no address is available to research in city directories.

5.4 HISTORICAL TOPOGRAPHIC MAP REVIEW

Kleinfelder obtained information regarding historical topographic maps of the Site vicinity from EDR. The topographic maps reviewed for this assessment are listed below in Table 5-3. Copies of the topographic maps are included in Appendix D.

TABLE 5-3

HISTORICAL TOPOGRAPHIC MAPS REVIEWED

Year:	Observations:
1895 (1:250,000 scale)	**Site:** Due to the scale of the 1895 Salt Lake topographic map, no information related to the Site can be obtained. **Surrounding Area:** Due to the scale of the 1895 Salt Lake topographic map, no information related to the surrounding areas can be obtained.
1903 (1:125,000 scale)	**Site:** Due to the scale of the 1903 Coalville topographic map, no information related to the Site can be obtained. **Surrounding Area:** A roadway oriented east to west is depicted within the Richardson Flat delineated area located north of the Site. No other improvements are depicted to the east, south, or west of the Site.
1955 (1:24,000 scale)	**Site:** Two structures and unimproved roadways are depicted on the Site. Additionally, an intermittent drainage depicted with a broken blue line is depicted on the Site oriented from the south to the northeast. **Surrounding Area:** Adjacent to the northern border of the Site is a unimproved access road, a railroad, and a Tailings Pond. No development is depicted to the east, south, or west of the Site.
1999 (1:24,000 scale)	**Site:** No buildings or structures are depicted on the Site in the 1999 Park City East topographic map. **Surrounding Area:** With the exception of an improved roadway oriented east to west, no development is depicted to north, south, east, or west of the Site.

Sources: USGS Topographic Map(s) –Salt Lake, Utah Quadrangle (1895), Coalville, Utah Quadrangle (1903) and Park City East, Utah Quadrangle (1955 and 1999).

5.5 BUILDING DEPARTMENT RECORDS

Based on the Site not having an address and due to no development being conducted on the Site, no building department records were reviewed.

5.6 PREVIOUS ASSESSMENTS

Previous assessment reports conducted on the Site were not provided by the Client. A review of available documents and previous reports obtained during regulatory agency reviews is provided in Section 4.2 and 4.5.4.

6 SITE RECONNAISSANCE

Kleinfelder's assessment activities included a Site reconnaissance. This section summarizes the findings from the Site reconnaissance.

6.1 METHODOLOGY AND LIMITING CONDITIONS

Mr. Corey Park and Mr. Ryan Merkley of Kleinfelder, performed a Site reconnaissance during soil sampling activities on October 14, 15, and 31, 2014. The Kleinfelder representatives were accompanied by property representatives during the Site reconnaissance. The Site reconnaissance included a visual inspection of the Site to assist in identifying the presence or likely presence of hazardous substances or petroleum hydrocarbons under conditions that indicate an existing release, a past release, or threat of release into structures, soil, groundwater, or surface water at the Site (i.e., RECs). Observations of readily-apparent environmental conditions are summarized in Table 6-1, and color photographs of the Site on Figures 4 through 6. The approximate Site boundaries are shown on Figure 2, "Site Vicinity Map".

At the time of the Site reconnaissance, the Site was clear of snow that may obscure the ground surface from view.

6.2 GENERAL SITE SETTING

The Site consists of approximately 341 acres of hillside land located on the east and west sides of Highway 40 approximately 0.25 miles south of Richardson Flat Road in the area referred to as the Clark Ranch Property. The Site includes terrain sloping down from the southwest to the northeast towards the Richardson Flat Tailings facility. The south and west portions of the Site consist of steep vegetated slopes while the remaining portions of the Site covered in low lying brush and divided by intermittent drainages.

Two concrete pads were located in the approximate center of the east portion of the Site as shown on Figure 2. The concrete pads are located adjacent to the observed garbage pit and unregistered well. According to information provided by Park City representatives gathered from

the owner of the property, these concrete pads were associated with a dairy that operated on the property.

6.3 SITE OBSERVATIONS

Site observations are further described in Table 6-1.

TABLE 6-1

SITE OBSERVATIONS

General Observations	Remarks	Not Observed
Current use	Undeveloped native hillside	
Current use likely to indicate RECs		X
Past use	Reportedly a former dairy operated on the Site in the approximate area of the observed concrete pads.	
Past use likely to indicate RECs		X
Structures	Two concrete pads were observed on the east side of the Site and may have been the former location of the reported dairy farm located on the Site as described by the Site owner.	
Roads	Multiple dirt unimproved and two-track roadways are located on the Site.	
Topography of Site and surrounding area	The topography of the Site slopes down significantly from the south to the northeast.	
Aboveground storage tanks (ASTs)		X
Below grade vaults		X

TABLE 6-1 (cont.)

SITE OBSERVATIONS

General Observations	Remarks	Not Observed
Burned or buried debris	Burned and buried debris was observed in a garbage pit located adjacent to the concrete pads and in intermittent drainages on the east side of the Site.	
Chemical storage		X
Chemical mixing areas		X
Discolored soil or water		X
Ditches, streams	Multiple intermittent streams were observed on the Site.	
Drains and piping	Piping (associated with what appears to be a groundwater well) was observed on the east side of the Site near the observed concrete pads.	
Drums	Multiple rusted drums ranging in size from 5 to 25 gallons.	
Electrical or hydraulic equipment (polychlorinated biphenyls [PCBs])		X
Interior and exterior observations or environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.		
Fill dirt from an unknown source		X
Fill dirt from a known source		X
Hazardous chemical and petroleum products in connection with known use		X

TABLE 6-1 (cont.)

SITE OBSERVATIONS

General Observations	Remarks	Not Observed
Hazardous chemical and petroleum products in connection with unknown use	During soil sampling activities at the Site, lead was observed in surficial soils as discussed in Section 8.	
Non-hazardous containers with contents		X
Hazardous waste storage		X
Heating and cooling system and fuel source+		X
Industrial waste treatment equipment		X
Loading and unloading areas		X
Odors		X
Pits, ponds, or lagoons		X
Pools of liquid		X
Process waste water		X
Sanitary sewer system		X
Septic system (e.g. tank and leach fields)		X
Soil piles		X
Interior and exterior observations or environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.		
Solid waste/evidence of unauthorized dumping	Debris including broken glass, building materials, and metal was observed in the area surrounding the observed concrete pads and within intermittent drainages.	

TABLE 6-1 (cont.)
SITE OBSERVATIONS

General Observations	Remarks	Not Observed
Stained pavement, soil or concrete		X
Stains or corrosion (interior, non-water)		X
Storm drains/catch basins		X
Stressed vegetation		X
Sumps and clarifiers		X
Surface water		X
Underground storage tank(s) (including heating oil tanks)		X
Unidentified substance containers	Multiple glass containers and crushed metal drums were observed on the east side of the Site near the observed concrete pads.	
Waste water discharge		X
Water supplies (potable and process)		X
Wells (irrigation, monitoring, or domestic)	What appeared to be a water well potentially used for domestic or irrigation purposes was observed adjacent to the concrete pads on the east side of the Site. The observed well is not registered with the State of Utah Water Rights Division.	
Wells (dry)		X
Wells (oil and gas)		X

6.4 RESULTS OF SITE RECONNAISSANCE

Kleinfelder conducted the reconnaissance of the Site on October 14, 15, and 31, 2014. During our reconnaissance no evidence of the use, storage, or disposal of hazardous materials or petroleum products was observed on the Site. Kleinfelder did observe a garbage pit and heavy debris in the area surrounding the observed concrete pads on the east side of the Site. Debris included broken glass, building materials, and crushed metal cans ranging in size from 5 to 55 gallons. The garbage pit and surrounding debris is considered an REC.

7 INTERVIEWS

The names of “Key Site Managers” were provided to Kleinfelder by the Client. Key Site Managers are contacted to obtain current and historical environmental information concerning the Site. Documents provided by Client are included in Appendix C. The following sections highlight information revealed during the interviews.

7.1 INTERVIEW WITH KEY SITE CONTACT

Kleinfelder contacted Ms. Sophie Gillmoor, whose husband owned and ranched the Site in the past. Ms. Gillmoor took my contact information to provide to her husband whom she thought would have a better understanding of the historical Site activities. As of the date this report was made available, Kleinfelder had not received a return phone call from Mr. Gillmoor.

7.2 INTERVIEW WITH OCCUPANTS

The Site is unoccupied; therefore, no interviews were conducted.

7.3 INTERVIEWS WITH LOCAL GOVERNMENT OFFICIALS

Local government officials were interviewed to obtain further information about environmental enforcement actions pending or ongoing at the Site and adjacent facilities, or relevant permits (e.g. building, air quality, well abandonment, etc.) for the Site and adjoining facilities. No additional information was received that is not included in Section 5 of this report.

7.4 INTERVIEW WITH CLIENT/OTHERS

Kleinfelder conducted multiple discussions with the Client including providing them with a User Questionnaire that was completed by Mr. Heinrich Deters, Park City Trails & Open Space Project Manager. According to Mr. Deters, he is not aware of current or historical activities on the Site that include the use, storage, or disposal of hazardous materials or petroleum products.

8 SOIL SCREENING AND SAMPLING

Based on historical mining activities surrounding the Site and the possibility of a irrigation canal extending onto the property, Kleinfelder personnel conducted x-ray fluorescence (XRF) analyzer screening of near surface soils in drainages on the east side of the Site and confirmation soil sampling from select screening locations. The purpose of this limited soil screening was to investigate potential metal impacts to soil from irrigation water diverted from the slurry canal used to transport tailings material to the Richardson Flat Tailings facility located to the north of the Site.

8.1 XRF SOIL SCREENING

On October 14, 15, and 31, 2014, Kleinfelder personnel traveled to the Site and used the Park City XRF to screen surficial and near surface soils along the potential alignment of the irrigation canal originating in an area delineated as part of the Park City Heights VCP facility. A map provided by the Client showed the possible alignment on the VCP facility to the northwest. A copy of this map is provided in Appendix C. Kleinfelder personnel oversaw the screening of soils at 49 locations within drainages on the east portion of the Site and in the proximity of the observed concrete pads as shown on Figure 3. While onsite, Kleinfelder personnel were escorted by a representative of the Site owner.

Prior to beginning screening of the soils, a system check of the Thermo Scientific Niton XL3t 600 analyzer was performed to assess analyzer performance. After checking the XRF analyzer system for accuracy, soils were screened by first exposing the near surface soil and removing any heavy organics using a clean shovel or hand auger. The exposed soil was then scanned with the XRF for a minimum period of 45 seconds. The soil screening results recorded by the XRF were also recorded for lead and arsenic in Kleinfelder representative field notes. A tabulated summary of the recorded lead values at each sample location is provided in Table 1 – XRF Soil Reading and Laboratory Analytical Results, located in Appendix E.

After screening the soils at each location a representative soil sample was collected in a new Ziploc bag pre-labeled with the screening location and lead XRF readings. The screening location was established as either a distance from the start point of 0 along the west fence line

or designated as S-PC-1 where “S” indicates that soil was screened, “PC” indicates the sample was screened for Park City, and “1” indicates the sample location. Kleinfelder personnel reviewed screening results and selected 14 representative soil samples to submit for laboratory analysis of lead to Environmental Science Corporation (ESC), a Utah-certified laboratory for analysis of lead by Environmental Protection Agency (EPA) Method 6010B. The representative samples were selected based on XRF readings, and to provide spatial representation.

LABORATORY ANALYTICAL RESULTS

In general, the laboratory reported lead concentrations were within the accuracy levels of the XRF analyzer with the exception of soils analyzed from sample locations S-PC-16, S-PC-17, S-PC-23, and S-PC-31 located on the eastern extent of the screened drainage and in the proximity of the concrete pads. The largest variance of these samples occurring at the S-PC-17 location with an XRF analyzer reading of 393 parts per million (ppm) and laboratory reported analytical result of 4,200 milligrams per kilogram (mg/kg). Please note that the conversion of ppm to mg/kg is a one to one linear conversion (i.e. 1 ppm = 1 mg/kg).

The laboratory analytical results have been tabulated in Table 1 located in Appendix E. The laboratory provided analytical reports and chain of custody documentation are also included in Appendix E.

CONCLUSIONS

The results of screened soils at the Site indicate lead impacts in select locations within observed intermittent drainages and in the proximity of the observed concrete pads at the Site. Of the screened soils Eleven XRF readings and nine analyzed soil samples exceeded the United States Environmental Protection Agency (EPA) established May 2014 Regional Screening Level (RSL) for lead in residential soils of 400 milligrams per kilogram. The results of our sampling and analysis exceeding the RSL are depicted on Figure 3.

Screening activities have identified widespread lead impacts to surficial soils in drainages and in areas surrounding the observed concrete pads. It is unknown if impacts are the result of irrigation water from known offsite sources, wind-blown deposits from the Richardson Flat Tailings Facility, or originate from other unknown sources.

9 EVALUATION

Kleinfelder performed this Phase I ESA of the Site consistent with the scope and limitations of ASTM Designation E 1527-13. The following sections describe Kleinfelder's findings and provide general background information about the Site. Findings address RECs, CRECs, HRECs, and notation of *de minimis* quantities, as applicable to the Site. In summary, Kleinfelder's assessment revealed the following information concerning the Site:

9.1 BACKGROUND

The following is a summary of Site background information:

- The Site consists of approximately 341 acres of hillside land located on the east and west sides of Highway 40 approximately 0.25 miles south of Richardson Flat Road in the area referred to as the Clark Ranch Property. With the exception of two concrete pads observed on the east side of the Site, no buildings, structures, or developments were identified on the Site. Kleinfelder conducted a Site reconnaissance on October 14, 15, and 31, 2014.
- The Site has primarily consisted of undeveloped native hillside with a portion of the Site being used as a dairy farm in the past.
- Improvements on the Site consist of barbed wire fencing, storm water drainage improvements (on the west side of Highway 40), unimproved roadways, and two concrete pads (on the east side of the Highway 40).
- In the proximity of the observed concrete pads, Kleinfelder personnel also observed a non-regulated groundwater well, garbage pit, and large amount of broken glass and crushed metal drums ranging in size from what appeared to be 5 to 25 gallons. The observed glass and garbage was concentrated in the area of the concrete pads, garbage pit, and drainages leading from the concrete pads towards the northeast.

9.2 FINDINGS, OPINIONS AND CONCLUSIONS

Kleinfelder has performed a Phase I ESA, in conformance with the scope of services required by ASTM Designation E 1527-13 and our Proposal No. SLC14P0175, dated March 14, 2014, of the Sommer Parcel located in Park City, Utah. Exceptions to and deviations from this practice

are described in Section 9.3 of this report. Kleinfelder's Phase I ESA identified three REC for the Site.

- The Site is located directly south of the Richardson Flats Tailings facility; therefore, soils on the Site may have become impacted by air transported concentrations of heavy metals.
- The Site contained two concrete pads that are reportedly associated with a former dairy farm operation. Concentrated debris including glass and steel drums were observed in a garbage pit and within the drainage leading to the northeast. Additionally, a groundwater well was observed near the concrete pads. This area is considered an REC due to potential impacts from burned and buried debris in the garbage pit and potential impacts to groundwater through the groundwater well.
- Lead impacted soils were identified at concentrations above EPA established clean-up levels in soil at the Site. The identified soil impacts may be associated with impacted water diverted from the irrigation canal identified within the Park City Heights VCP or from air transmitted deposits from the Richardson Flat tailings or activities related to the concrete pads located on the Site.

Kleinfelder's Phase I ESA did not reveal evidence of CRECs of HRECs.

9.3 DEVIATIONS AND ADDITIONAL SERVICES

The scope of this Phase I ESA does not incorporate ASTM Standard non-scope considerations, such as asbestos-containing material, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historical resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality/vapor intrusion, and high-voltage power lines.

9.4 RECOMMENDATIONS

Based on the findings presented in this report, Kleinfelder notes and recommends the following actions or responsibilities associated with future property ownership:

- When disturbing and/or removing soil from the Site during development activities, Kleinfelder recommends properly characterizing soils for lead impacts as required by

appropriate regulating entities or disposal facilities. If the sampling identifies that the impacted soils are at concentrations which classify them as “hazardous” the soils should be handled, transported, and disposed of appropriately.

- If the Site is intended to remain undeveloped land, education of the public concerning the historic use of the land and potential environmental impacts, may be warranted. This could be accomplished through many ways such as public outreach programs or visible signage in access areas to the property providing information regarding impacts that may be present on the Site. These programs should be discussed with Park City personnel or other properly trained entities on the best methods to reach the public.
- Potential impacts from burned and buried debris in the area of the concrete pads on the Site should be investigated prior to future development. The non-registered groundwater well should be abandoned according to regulatory standards.

9.5 DATA GAPS

Although Kleinfelder attempted to obtain reasonably ascertainable information regarding the Site, some information was either not received or not readily available at the time of this report. Therefore, consistent with ASTM Standard Practice E1527-13, the following data gaps have been identified:

- Kleinfelder was unable to complete the requirement to review the Site history back to first developed use, based on the presence of a structure observed in the 1938 reviewed aerial photograph (attached in Appendix C).
- Kleinfelder was unable to conduct an interview with the current owner of the Site.
- Kleinfelder was unable to conduct an interview with the previous owner of the Site.

In Kleinfelder’s opinion, based on information received to date, the lack of this information does not represent a data failure. Based on a review of the data gaps presented above, it is Kleinfelder’s opinion that the data gap is not likely to have affected the identification of hazardous substances or petroleum products for the evaluation of RECs at the Site. Should the additional information from these agencies alter our conclusions and recommendations, the Client will be notified.

10 REFERENCES

ASTM International (2013). *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* Designation E 1527-13.

Bryant, B., 1990, Geologic Map of the Salt Lake City 30' x 60' Quadrangle, North Central Utah and Uinta County Wyoming, Utah Geological Survey Map 190DM.

Deters, Heinrich. User Questionnaire. November 7, 2014.

Environmental Data Resources, Inc. (EDR)b. The EDR Aerial Photo Decade Package. Clark Ranch Property Highway 40, Park City, UT 84060, Inquiry Number: 4047427.9, dated August 28, 2014.

Environmental Data Resources, Inc. (EDR)d. The EDR Historical Topographic Map Report. Clark Ranch Property Highway 40, Park City, UT 84060, Inquiry Number: 04047427.4, dated August 25, 2014.

Environmental Data Resources, Inc. (EDR)a. The EDR Radius Map Report with GeoCheck.® Clark Ranch Property Highway 40, Park City, UT 84060, Inquiry Number: 04047427.2r, dated August 25, 2014.

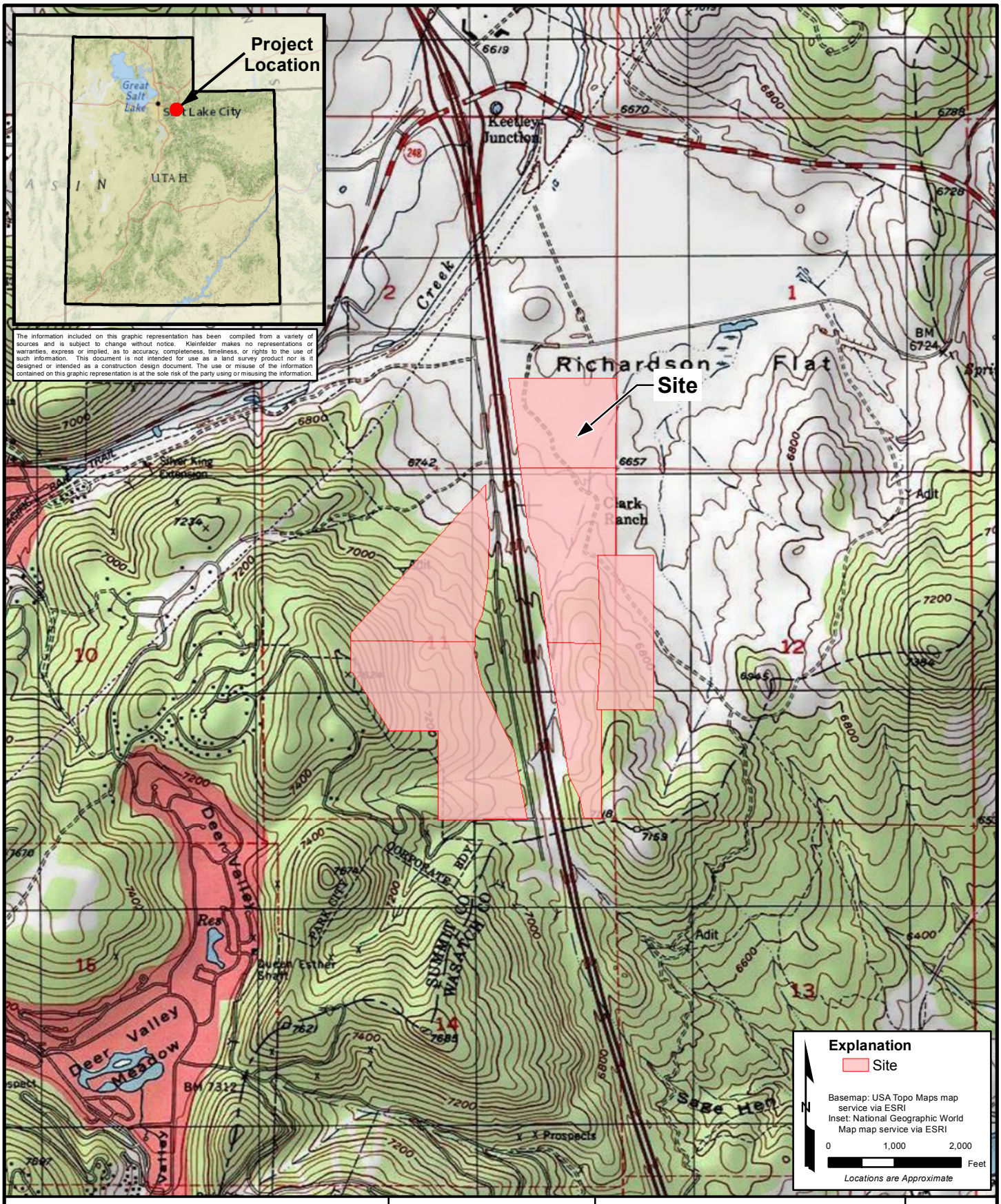
Environmental Data Resources, Inc. (EDR)c. Certified Sanborn® Map Report. Clark Ranch Property Highway 40, Park City, UT 84060, Inquiry Number: 4047427.3, dated August 25, 2014.

Utah Department of Environmental Quality website. http://www.deq.utah.gov/

KLEINFELDER

Bright People. Right Solutions.

Figures



KLEINFELDER
Bright People. Right Solutions.

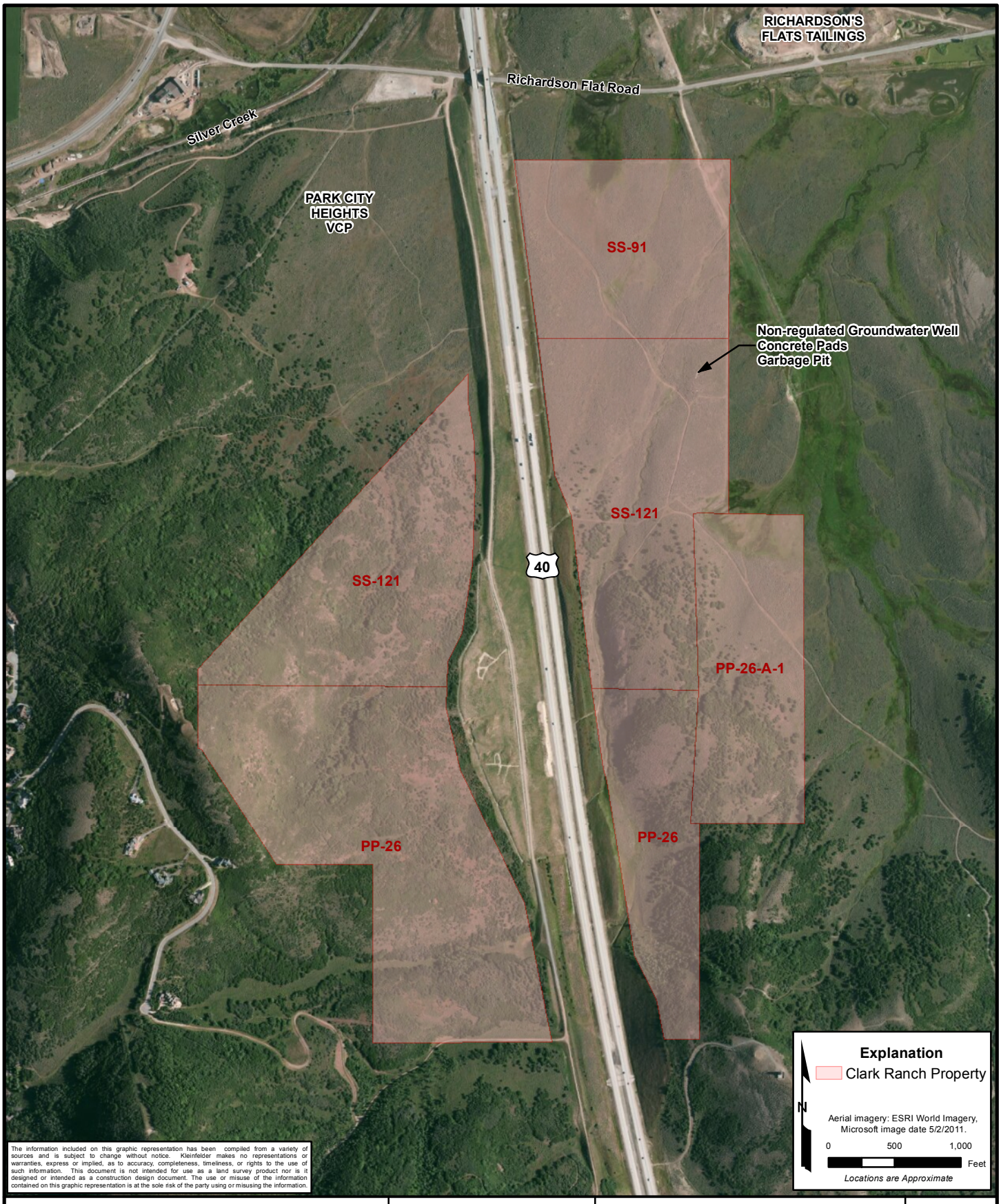
PROJECT NO.	20150092
DRAWN:	11/17/2014
DRAWN BY:	KFH
CHECKED BY:	CAP
FILE NAME:	Figure1.mxd

SITE LOCATION MAP

Clark Ranch Property
Phase I Environmental Site Assessment
Highway 40 and Richardson Flat Road
Park City, Summit County, Utah

FIGURE

1



KLEINFELDER
Bright People. Right Solutions.

PROJECT NO.	20150092
DRAWN:	11/17/2014
DRAWN BY:	KFH
CHECKED BY:	CAP
FILE NAME:	Figure2.mxd

SITE VICINITY MAP

Clark Ranch Property
Phase I Environmental Site Assessment
Highway 40 and Richardson Flat Road
Park City, Summit County, Utah

FIGURE

2

SS-91

S-PC-31
107
450

S-PC-41
S-PC-1
1,530
760
S-PC-42
0
200
S-PC-30
S-PC-17
393
4,200
300
S-PC-29
S-PC-16
139
440
S-PC-2
616
430
S-PC-22
S-PC-21
S-PC-9
S-PC-8
S-PC-34
S-PC-28
1,181
1,200
S-PC-23
189
760
S-PC-7
500
S-PC-4
S-PC-20
694
S-PC-27
S-PC-5
1,569
1,200
S-PC-15
S-PC-18
2,312
1,800
SS-121
600
S-PC-6
S-PC-10
S-PC-11
S-PC-14
S-PC-24
570
S-PC-19
1,310
S-PC-26
1,354
S-PC-12
700
S-PC-25
1,823
S-PC-13
S-PC-32
S-PC-38
S-PC-3
543
S-PC-35
S-PC-33
S-PC-39
S-PC-36
S-PC-40
S-PC-37

N

Aerial imagery: ESRI World Imagery,
Microsoft image date 5/2/2011.

0 50 100 Feet

Locations are Approximate

Explanation

- ○ XRF Location
- S-PC-6 / 300 — Soil Sample Number
- 1,530 — XRF Reading in parts per million (ppm)
- 760 — Laboratory Analytical Result in milligrams per kilogram (mg/kg)
- Clark Ranch Property
- SS-121 — Summit County Parcel Identification Number

KLEINFELDER
Bright People. Right Solutions.
www.kleinfelder.com

PROJECT NO.:	20150092
DRAWN:	11/17/2014
DRAWN BY:	KFH
CHECKED BY:	CAP
FILE NAME:	Figure3.mxd

SITE LEAD IMPACTED SOIL SAMPLING MAP

Clark Ranch Property
Phase I Environmental Site Assessment
Highway 40 and Richardson Flat Road
Park City, Summit County, Utah

FIGURE
3