



State of Utah

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Environmental Quality

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DIVISION OF WASTE MANAGEMENT  
AND RADIATION CONTROL

Douglas J. Hansen  
Director

December 13, 2023

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

RE: Site Characterization Report – 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 Site Characterization Report (Report), dated November 15, 2023, for the Gordo Property (Site) located at Kearns Boulevard and Richardson Flat Road in Park City, Summit County, Utah.

Impacts from metals exceeding screening levels and background concentrations appear to be limited to imported fill soils in Zone 1 and Zone 2. The metals impacts present a risk to future residential and commercial receptors at the Site and will require corrective action.

The Report states that there are no current or future impacts to groundwater based on the following lines of evidence:

- Resource Conservation and Recovery Act (RCRA) 8 metals exposure point concentrations (EPCs) in subsurface native soils in Zone 1 and Zone 2 are at or below site-specific background threshold values (BTVs);
- RCRA 8 metals EPCs in subsurface native soils in Zone 1 and Zone 2 are below the dilution attenuation factor (DAF) 20 soil screening levels (SSL) for all metals except arsenic, where the site-specific arsenic BTVs also exceeded the DAF 20 SSL;
- The presence of low permeability clay soils and shallow bedrock are likely to limit infiltration of precipitation to groundwater at the Site; and
- Planned remediation of metals impacted soils in Zone 1 and Zone 2 will eliminate the potential for future impact to groundwater.

Based on the above information, a groundwater investigation at the Site will not be required.

(Over)

DSHW-2023-212289

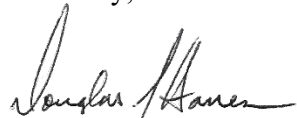
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Park City has requested a waiver for performing an ecological risk assessment at the Site based on the planned redevelopment of the Site. Sufficient information has been provided to justify a lack of suitable wildlife habitat and to justify incomplete ecological exposure pathways. As these environmental conditions meet the criteria in Utah Administrative Code R315-101-5(j)(3), the ecological risk assessment waiver is approved.

The Report adequately addresses the informational data gaps identified in the Site Characterization Work Plan and Division comments and is therefore approved. Please submit a Corrective Action Plan (CAP) addressing remediation of the Site contamination.

If you have any questions, please call Karen Wallner at 385-499-0218.

Sincerely,



Douglas J. Hansen, Director

Division of Waste Management and Radiation Control

DJH/KHW/jk

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)