Corrective Action Plan

Gordo Property Kearns Boulevard and Richardson Flat Road Park City, Summit County, Utah

January 23, 2024 | Terracon Project No. 61227505



Prepared for: Park City Municipal Corporation Park City, Utah





Facilities
Environmental
Geotechnical
Materials



January 23, 2024

State of Utah Department of Environmental Quality Division of Waste Management and Radiation Control 195 North 1950 West Salt Lake City, Utah 84116

Attn: Doug Hansen Division Director E: <u>djhansen@utah.gov</u> P: (801) 536-0203

Re: Corrective Action Plan Gordo Property Kearns Boulevard and Richardson Flat Road, Park City, Utah Terracon Project No. 61227505

Dear Mr. Hansen:

On behalf of Park City Municipal Corporation, Terracon Consultants, Inc. (Terracon) is pleased to provide this Corrective Action Plan (CAP) to address environmental impacts identified at the site referenced above.

Should you have any questions or require additional information, please do not hesitate to contact our office.

Sincerely,

Terracon Consultants, Inc.

Daniel Dean Group Manager Amy Austin Authorized Project Reviewer

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1.0 Introduction

Terracon Consultants, Inc. (Terracon), has prepared this Corrective Action Plan (CAP) for the Gordo Property site (site) located at the northwest corner of Kearns Boulevard and Richardson Flat Road, Park City, Utah (<u>Appendix A</u>, Exhibit 1).

The site is comprised of approximately 16 acres of land currently owned by Park City Municipal Corporation (PCMC) consisting of the addresses, Summit County Assessor Parcel Numbers (APNs), and land uses listed below:

Address	APN	Acres	Use
Kearns Boulevard and Richardson Flat Road	PCA-9-95-K-X	0.70	soil stockpile
Kearns Boulevard and Richardson Flat Road	PCA-95-1-X	1.00	undeveloped/unused
Kearns Boulevard and Richardson Flat Road	PCA-95-B-X	1.00	parking and storage area
Kearns Boulevard and Richardson Flat Road	PCA-95-A-1-X	0.58	undeveloped/unused
Kearns Boulevard and Richardson Flat Road	PCA-95-A-X	1.42	undeveloped/unused
Kearns Boulevard and Richardson Flat Road	PCA-9-95L-X	0.70	soil stockpile
Kearns Boulevard and Richardson Flat Road	PCA-9-95-H-X	1.00	soil stockpile
Kearns Boulevard and Richardson Flat Road	PCA-9-95-J-X	1.78	undeveloped/unused



Address	APN	Acres	Use
Kearns Boulevard and Richardson Flat Road	PCA-9-95-G-X	0.87	undeveloped/unused
Kearns Boulevard and Richardson Flat Road	PCA-9-95-M-X	1.70	undeveloped/unused
Kearns Boulevard and Richardson Flat Road	PCA-9-95-F-X	0.95	undeveloped/unused
Kearns Boulevard and Richardson Flat Road	PCA-9-95-X	3.52	undeveloped/unused

1.1 Proposed Redevelopment of the Site

Specific development plans have not been finalized at this time, but PCMC plans to redevelop the property as a mixed-use development that may include residential, commercial, and transit hub components.

1.2 Background

The site was historically used primarily as open space. A portion of the site was used for vehicle parking. The site was acquired by PCMC in multiple phases from 1996 through 2008. Beginning in 2010 and with approval from the Utah Department of Environmental Quality (UDEQ), Division of Environmental Response and Remediation (DERR) and acknowledgment from the United States Environmental Protection Agency (EPA), PCMC utilized the site to temporarily stockpile approximately 34,000 cubic yards of Bevill-exempt metals-contaminated soil excavated from mining-impacted development projects throughout the Park City area. PCMC anticipated that the site would be developed as a permitted repository for metals-impacted soils with oversight from UDEQ's Division of Waste Management and Radiation Control (DWMRC). However, PCMC has since revised its development plans for the site and intends to remediate and redevelop the site for other purposes.

1.3 Public Notice

Per Utah Administrative Code (UAC) R315-101-10, Public Notice is not required prior to conducting remedial work at the site. A Public Notice is only required upon submittal of a



Site Management Plan (SMP). If a SMP is submitted, the Public Notice will be published for two consecutive days in the local newspaper, mailed and/or hand-delivered to adjacent landowners, and will provide 30 calendar days for public comments to be submitted.

2.0 Environmental Assessment

2.1 Site Investigations

Multiple investigations have been conducted at the site. A field X-ray fluorescence (XRF) survey was conducted by AMEC Earth & Environmental (AMEC) in September 2010. Approximately 180 locations were sampled via XRF for arsenic and lead. AMEC's XRF data indicated that lead impacts exceeding EPA Regional Screening Levels (RSLs) for Residential or Industrial use were largely confined to the soil stockpile, but that limited impacts were present on the northern portion of the site near the site entrance road.

A second investigation was conducted by Gerhart Cole Inc. (GCI) in 2016. GCI collected 48 soil samples from 36 test pits located throughout the site. The results from GCI's investigation were largely consistent with the results of AMEC's XRF survey and displayed a similar pattern of impacts.

A third investigation was conducted by Terracon (Terracon 2023). Terracon collected 59 soil samples from 30 sampling locations and calculated site-specific background threshold values (BTVs). Field observations and analytical results from the imported soil stockpile were consistent with results reported by the previous investigations. The stockpile volume was estimated to be approximately 30,000 cubic yards, which is consistent with historical estimates provided by PCMC. The 2023 Terracon investigation also identified a smaller separate berm area containing metals-impacted soils. The volume of the berm was estimated to be approximately 1,200 cubic yards. Historical aerial photograph review indicated that the berm was created in the late 1990s or early 2000s and may pre-date PCMC's acquisition of the site and creation of the PCMC's soil stockpile. It is considered likely that the berm material was imported to the site from an off-site source.

2.2 Risk Evaluation

A Risk Evaluation was conducted for the site and submitted to DWMRC in November 2023 (Terracon 2023). The risk evaluation results indicated the following:

 Metals exposure point concentrations (EPCs) in imported contaminated fill soils present a risk to future residential or commercial receptors at the site.



Metals EPCs in underlying native soils are consistent with or below site-specific BTVs. If imported contaminated fill soils were removed, the underlying native soils would present risks that are comparable to on-site background risks.

Thus, the overall conclusion of the Risk Evaluation was that excavation and off-site disposal of imported contaminated fill soils would reduce overall site risks to background levels. Site-specific BTVs exceeded EPA RSLs for arsenic, cadmium, and lead.

3.0 Corrective Action Plan and Contingency Plan

3.1 Corrective Action Plan

3.1.1 Purpose and Scope

Future development at the site is anticipated to include mixed-use commercial, residential, and transit hub uses. This CAP details a response action consisting of removal and off-site disposal of metals-impacted fill soils and will allow for the proper management and handling of impacted soils present at the site. This CAP includes the following:

- a description of work to be completed
- a description of known or suspected contaminants at the site
- methods to segregate impacted soil from non-impacted soil at the site
- methods for profiling and disposal of excavated soils
- a description of the site safety responsibilities and contingency actions to be implemented, if necessary
- contingencies if unexpected contamination is encountered

Following the implementation of the CAP, the site will be managed per the requirements of the Park City Soils Ordinance (Park City Municipal Code Section 11-15). Because background concentrations of some metals present at the site exceed screening levels (e.g., EPA RSLs, Park City Soils Ordinance limits), native soils with metals concentrations above screening levels but below site-specific BTVs will be managed in place, with risk managed through engineering controls and institutional controls (e.g., Park City Soils Ordinance requirements). If required, a SMP may be implemented to ensure that exposure pathways are incomplete for future occupants and commercial workers.

3.1.2 Cleanup Objectives and Proposed Site Use

The cleanup objective for the site is excavation and off-site disposal of imported fill soils. The fill soil boundaries and planned excavation areas are shown in <u>Exhibit 2 (Appendix A)</u>.



3.1.3 Corrective Action

The proposed response actions described below establish procedures for excavation, handling, management, and disposal of impacted soils at the site.

- Contaminated fill soil will be excavated. It is expected that soil will be excavated to depths of up to 15 feet (Exhibit 2). Excavation limits will maintain safe side-slopes to protect workers from potential wall collapse. Any soil that cannot safely be removed will be managed in place. Excavated soil will be direct-loaded into haul trucks for transportation to the selected off-site disposal facility.
- An environmental technician will be on-site to visually observe the soil excavation process and the excavated soil characteristics. A portable XRF will be used to guide the soil excavation in addition to visual distinctions between imported fill soils and native soils. Impacted soils will be transported to and disposed of at the Three Mile Canyon Landfill in Coalville, Utah. Waste characterization sampling will be conducted per landfill requirements (Section 3.2.1). Disposal waste manifests will be provided in the CAP Implementation Report.
- Upon completion of the soil excavation, soil confirmation samples will be collected from the excavation areas. Confirmation soil samples will be collected on a 50-foot grid. Samples will be analyzed for Resource Conservation and Recovery Act metals (RCRA 8; arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). If metals concentrations are above residential RSLs for barium, cadmium, mercury, selenium, and silver, or BTVs for arsenic, cadmium, and lead (Table 1), the excavation will be extended, and the process will be repeated until confirmation samples report metals concentrations below RSLs and/or BTVs. The confirmation samples will be collected in pre-cleaned containers provided by the laboratory, labeled, sealed, and preserved on ice until delivery to a Utah-certified analytical laboratory under chain-of-custody protocols. Copies of the laboratory analytical reports will be included in the CAP Implementation Report.

3.1.4 Corrective Action Documentation

Field surveys will identify the confirmation sample locations. Locations where postexcavation soil metals concentrations are above screening levels but below BTVs will also be recorded. The survey information will be included in the CAP Implementation Report.

3.2 Construction Contingency Plan

While not anticipated, if unanticipated impacts are discovered during implementation of the CAP, the actions discussed in this section will be implemented. Workers will be advised to be observant for obvious signs that impacted materials have been encountered. These may include the following:



- undocumented underground storage tanks associated with heating oil, diesel, gasoline, or other products
- strong or unusual chemical odors
- obvious physical signs of industrial or other wastes, including ash, cinders, tars, sludges, powders, resins, liquids, or containers (e.g., drums, totes, etc.)
- unlabeled drums or containers
- buried metal objects such as tanks and groundwater production wells
- co-workers who suddenly become ill on the site.

If an environmental technician is not on-site when potential unanticipated contamination is encountered, the site contractors will be required to temporarily stop work in the immediate area to allow for the field technician to mobilize to the site. The contractor will immediately notify the owner or the owner's representative. If unexpected contamination is encountered, DWMRC will also be notified.

3.2.1 Waste Disposal Characterization

Prior to the start of excavation, a representative sample of contaminated fill soils will be collected and analyzed for RCRA 8 metals using the Toxicity Characteristic Leaching Procedure (TCLP; EPA Method 1311) per Three Mile Canyon Landfill requirements. If the soils exhibit a TCLP barium concentration of $\geq 100 \text{ mg/L}$, an arsenic, lead, chromium, or silver concentration of $\geq 5 \text{ mg/L}$, a cadmium or selenium concentration of $\geq 1 \text{ mg/L}$, or a mercury concentration of $\geq 0.2 \text{ mg/I}$, the soils may be treated with monocalcium phosphate [Ca(H₂PO₄)₂·H₂O] to reduce leachability and re-tested via TCLP. Alternatively, the soil may be disposed of at Republic Services' Wasatch Regional Landfill in North Skull Valley, Utah which has an existing agreement with PCMC to accept the soils as non-hazardous contaminated soil.

3.3 Procedures for Sampling, Data Generation and Analysis, and Reporting

3.3.1 Sample Handling and Custody

Samples will be identified, labeled, preserved, and handled following Terracon SOP 20 (<u>Appendix C</u>), which includes chain of custody and documentation procedures. Required sample containers, sample volumes, sample holding times, and sample preservation methods are summarized in Table 2.

Samples will be placed into the appropriate laboratory-provided container immediately after collection. The container will remain in the sight of the sampler or will be locked in a secured area until the samples are transported under chain of custody protocols for delivery to the laboratory.



3.3.2 Analytical Methods

Details for analytical method requirements are provided in Table 1 and Table 2. All analytical methods will follow standard EPA procedures as outlined in Test Methods for Evaluating Solid Wastes—Physical/Chemical Methods (SW-846). Please refer to SW-846 for analytical SOPs and information regarding analytical equipment, instrumentation, performance criteria, corrective action procedures and documentation, sample disposal, method validation information, and procedures for nonstandard methods. Laboratory turnaround times will be specified on the chain of custody records for each sample set, but typically the standard turnaround time is seven to ten working days unless a quicker turnaround time is requested or required.

3.3.3 Quality Control

To ensure that high-quality, reliable data are consistently collected and that data are comparable to previous investigations, QA procedures will be followed throughout the investigation. Quality assurance procedures include investigation objectives outlined in this CAP, following SOPs, and collecting and analyzing field and laboratory QC samples.

QC samples collected in the field will be preserved, handled, and transported in an identical manner as the environmental samples. QC samples will include the following:

- field duplicates (10% of total sample load)
- matrix spikes and matrix spike duplicates (MS/MSDs)
- laboratory method blanks
- laboratory control samples and laboratory control sample duplicates (LCS/LCSDs)

3.3.4 Instrument/Equipment Testing, Inspection, and Maintenance

Testing, inspection, and maintenance of sampling equipment and field instrumentation will be performed by field personnel prior to each day's field use and in accordance with the procedures and schedules in the manufacturers' specifications. A supply of appropriate spare parts and batteries will be maintained with each instrument in its transport case, along with instrument calibration supplies. Any identified deficiencies will be documented in the field logbook, along with any corrective actions (e.g., spare parts replacement and instrument re-testing) and the effectiveness of corrective actions.

3.3.5 Instrument/Equipment Calibration and Frequency

Field instruments will be calibrated by field personnel in accordance with manufacturers' specifications, National Institute of Standards and Technology (NIST) standards, or equivalent. Calibration deficiencies, if any, will be documented in the field logbook along with their resolution (e.g., spare parts replacement and re-calibration).



Laboratories utilized for this investigation will meet all State of Utah, The National Environmental Laboratory Accreditation Conference Institute (NELAC), and EPA method protocols necessary to produce legally and defensible analytical data, as indicated in the Utah Environmental Laboratory Certification Program (ELCP) document. In the event of a negative audit finding or any other circumstance (which raises doubt concerning the laboratory's competence or compliance with required procedures), the laboratory ensures that those areas of concern are quickly investigated. A resolution of the situation is promptly sought and, where necessary, recalibration and retesting are conducted. Records of events and corrective actions taken by the laboratory to resolve issues and to prevent further occurrences are maintained.

3.3.6 Inspection/Acceptance for Supplies and Consumables

Sample containers and other dedicated consumables will meet EPA criteria for cleaning procedures required for low-level chemical analysis. Sample containers will have Level II certification provided by the manufacturer, in accordance with pre-cleaning criteria established by EPA in "Specifications and Guidelines for Obtaining Contaminant-Free Sample Containers." The certificates of cleanliness are maintained by the container suppliers and can be obtained upon request using the container batch and lot numbers. Sample containers and sample preservatives (where applicable) will be provided by the laboratory. The containers shall be pre-preserved prior to the sampling event if required. New disposable nitrile sampling gloves will be used during the collection of samples and will be discarded after the collection of each sample. Prior to use, the materials provided by the laboratory or other suppliers will be inspected visually for signs of tampering, contamination, or damage. No evidence of tampering, contamination, or damage will be acceptable. The field team leader will be responsible for the inspection. Spare field supplies and consumables shall be stored and maintained in a secured storage warehouse and used as needed by field personnel for each day's field activities, and the reserves of consumables will be reordered/replenished as needed.

3.3.7 Use of Existing Data

All existing data collected under DWMRC-approved work plans will be considered definitive data acceptable for use. All other data will be considered non-definitive and used only for reference.

3.3.8 Data Reporting and Management

CAP documentation will be compiled and detailed in a CAP Implementation Report that will be submitted to DWMRC. Interim and/or supplemental follow-up reports may also be prepared on an as-needed basis. The report(s) will summarize the data collected, document the investigation procedures and results, detail any data gaps, and will include supporting maps, figures, and data summary tables. Appendices will include complete laboratory



analytical reports, including laboratory QA/QC evaluation and chain of custody documentation, and waste disposal manifests.

Data will be processed using commercially available word processing, spreadsheet, and/or database programs. During the transcription of field measurements, each entry from field logbooks and forms will be double-checked immediately after each transcription. To minimize potential errors in laboratory data transcription, the use of electronic data deliverables (EDDs) will be maximized during data entry to summary tables and databases. The control mechanism to detect and correct possible errors in data transcription, reduction, reporting, and data entry to forms, reports, and databases will be the senior peer review of documents by the Project Manager and QA/QC Officer. Data will be stored electronically on a local server hard drive (subject to daily backup on a separate file server) and on the laboratories' database system. They can be retrieved via the local server and via the laboratories' secured online data access system.

3.3.9 Data Review

Following receipt of the laboratory analytical results and initial review by the Project Manager, the data will be forwarded to the QA/QC Officer for review, which will include evaluation of whether any of the data is flagged or if laboratory control limits were not met.

3.3.10 Contingency Plan

If unforeseen issues arise before or during the sampling activities that have not been specifically addressed in this CAP, DWMRC will be notified by telephone and email. The CAP will be revised and amended as necessary to address the new issues or deviations to the plans herein.

3.4 Site Safety

A Site Safety Plan will be prepared for use on-site by field personnel during remedial activities. The Site Safety Plan will provide a hazard assessment based on existing soil analytical data and will specify general work and monitoring procedures to minimize safety incidents. Safety equipment, decontamination procedures, site control, and emergency contacts will also be included. All subcontractors and general contractors will be responsible for the preparation of their own task-related site safety plans.

The following protocols will be followed in any situation where impacted materials are encountered that were not anticipated and which may pose an immediate hazard to human health or the environment:

 Work in the area where the waste/impacts are encountered will be stopped immediately, the area secured, and the General Contractor Project Manager and



environmental Project Manager notified to assemble a response team and arrange for a preliminary inspection and assessment of the situation.

- Necessary steps will be taken to initiate an emergency response, if warranted, and to stabilize the situation to the extent possible.
- DWMRC may be contacted to determine if additional steps are necessary to properly manage the impacts encountered. If required, a brief plan will be submitted to the DWMRC Project Manager for review and approval to document the proper management of the impacted media.
- The impacted media will be managed in accordance with the applicable DWMRCapproved plan.

3.5 Site Security

During the implementation of the CAP, the contractor will control access to the property by blocking the site to non-essential personnel. The excavation area and any temporary stockpiles will be barricaded, as necessary, to restrict and protect access from non-essential personnel.

3.6 Runoff Control

The excavation contractor will implement a Storm Water Pollution Prevention Plan (SWPPP) and comply with all requirements of UDEQ's Construction General Permit (CGP) to protect nearby surface waters, prevent surface runoff, and prevent transporting mud and debris off-site. As part of the SWPPP, any temporary soil stockpiles will be placed on a 6+ mil plastic layer or other equivalent impervious surface. Berms will be used as needed around the stockpile perimeter to prevent runoff.

3.7 Decontamination of Equipment

Prior to leaving the site, equipment will be decontaminated to avoid transporting impacted soils off-site. A decontamination area will be set up and designated (Exhibit 2) where visible soil will be brushed off or sprayed from the heavy equipment, especially from the tires and loading buckets, and any hand tools, other tools, or equipment that may contain residual soils from the excavation.

3.8 Dust Control

Dust control will be implemented by the excavation contractor pet the requirements of the Park City Soils Ordinance (Park City Municipal Code Section 11-15-6). A formal Fugitive Emissions Control Plan may need to be submitted to the UDEQ Division of Air Quality (DAQ)



by the excavation contractor. If visible dust is generated, the work site will be wetted, or work will be suspended until weather conditions permit work to continue. If temporary soil stockpiles are found to be generating fugitive dust they will be wetted and/or covered with 6+ mil plastic.

4.0 Documentation and Reporting

This CAP proposes excavating and properly disposing of impacted soils and conducting confirmation sampling to confirm the complete removal of soils exceeding RSLs and/or BTVs. When the work is completed, a CAP Implementation Report will be generated to document the Corrective Action and submitted to DWMRC. The report will document the location and results of all sampling conducted at the site, the extent of excavations, the location of impacted materials remaining at the site, if any, and the final disposal of impacted soils removed from the site. The report will include any deviations from the CAP, a data quality discussion for all confirmation samples collected during the CAP implementation, and will provide disposal manifests documenting the quantity of material disposed of at the landfill.

5.0 References

Terracon, 2023. Site Characterization Report, Gordo Property, Kearns Boulevard and Richardson Flat Road, Park City, Utah, Terracon Project No. 61227505, November 15, 2023. Appendix A Exhibits





Appendix B Tables

TABLE 1 SCREENING LEVELS FOR CONTAMINANTS OF CONCERN - METALS IN SOIL

Parameter	CAS No.	EPA RSL Resident Soil	EPA RSL Industrial Soil	Site-Specific BTV	Method Detection Limits
		(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
ARSENIC	7440-38-2	0.68	3	38.19	0.65
BARIUM	7440-39-3	15,000	220,000	378.30	0.26
CADMIUM	7440-43-9	7.14	100	10.84	0.07
CHROMIUM	7440-47-3	120,000	1,800,000	33.17	0.14
LEAD	7439-92-1	400	800	1,382	0.19
SELENIUM	7782-49-2	390	5,800	0.924	0.74
SILVER	7440-22-4	390	5,800	11.98	0.28
MERCURY	7439-97-6	11	46	2.53	0.0028

CAS – Chemical Abstracts Service

EPA RSL - EPA Regional Screening Level (May 2023)

Chromium EPA RSLs are for Chromium III (insoluble salts).

BTV - Background Threshold Value

NE - Not Established.

mg/kg – milligrams per kilogram

TABLE 2ANALYTICAL METHOD SUMMARY

Parameter	Matrix (Solid/Liquid)	Analytical Method	Sample container/ preservative	Holding Time
Total RCRA Metals	Soil	SW-846 6010B/6020, SW-846 7471	2 oz glass, none, 4°C	180 days ¹
TCLP RCRA Metals	Soil	SW-846 1311	4 oz glass, none, 4°C	180 days ¹

1 - 28 days for Hg

Appendix C Terracon SOP #20 Sample Handling and Documentation

SOP 20

Sample Handling and Documentation

Introduction

This SOP describes procedures to follow once soil, sediment, or water samples are collected to ensure that the samples are handled properly and that appropriate documentation is completed.

Sample Handling

Chemical resistant gloves will be worn during collection and initial handling of all samples. All samples will be promptly placed in an iced cooler to maintain a temperature of 4°C. Typically, samples selected for chemical analysis are delivered at the end of each day to the analytical laboratory. If they are not submitted to the laboratory on the same day collected, they will be stored in a refrigerator in a locked sample storage room at Terracon's office until transport and delivery to the laboratory in an iced cooler. Upon receipt of the samples, the laboratory will record the internal temperature of the sample transport coolers on the chain of custody record.

Documentation

Sample Identification and Labeling

Samples will be labeled following the specific labeling requirements set forth in the sampling plan or using labeling methods that identify the area from which they were collected and the depth.

Each sample sleeve or sample container will be immediately labeled with the following information:

- Project number
- Sample identification
- Sample depth
- Date and time collected
- Analyses requested
- Filtered or unfiltered (for water samples)

This information will also be recorded in the field notebook. An example sample label is provided as an attachment to this SOP

Chain of Custody

Chain of custody documentation will begin in the field for each sample submitted to the laboratory and will be maintained by laboratory personnel. Samples will remain in the possession of the sampler at all times, or in a locked facility until delivery to the analytical laboratory. A chain of custody form will be completed and will accompany each sample cooler to the analytical laboratory. An example chain of custody form is provided as an attachment to this SOP.

Field Book

Terracon field personnel will maintain a field log book to record all field activities. The field logbook will be a weather-resistant bound survey-type field book. All data generated during the project and any comments or other notes will be entered directly into the field logbook.

Example Sample Label:

	Prepared	by	Environmental	Science	Corp
roject:					
roj #:					
Sample L	ocation/)	D:			
Analysis	Reqd:				
Date:			Time:		

Example Chain of Custody Form:

		Bi	ling Informat	tion:			4	Analys	is/Cont	ainer/Pre	servative			Chain of Custody
Terracon - Draner	a -		•			1								Page of
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E	XAMP	LEC	CHAI FO	N O RM	F Cl	JS	ТС	D	Y					
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Matrix: SS - Sol/Solid GW - Gr		PLE C	FO FO	N O RM	F Cl	JS	TC	D	Y		p		Ter	np
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