



Jennifer Nelson &lt;jennifernelson@utah.gov&gt;

## Fwd: Spill - Surface Water Discharge from Treasure Mountain JH

1 message

Thomas Daniels <tdaniels@utah.gov>  
 To: Jennifer Nelson <jennifernelson@utah.gov>

Wed, Dec 10, 2025 at 11:14 AM

In response to the Park City GRAMA Request



Thomas Daniels |Manager | Site Assessment Section

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----- Forwarded message -----

From: Stephen Galley <[sgalley@rrenviro.com](mailto:sgalley@rrenviro.com)>  
 Date: Fri, Oct 10, 2025 at 10:19 AM  
 Subject: Spill - Surface Water Discharge from Treasure Mountain JH  
 To: Thomas Daniels <[tdaniels@utah.gov](mailto:tdaniels@utah.gov)>, McComb, Martin <[McComb.Martin@epa.gov](mailto:McComb.Martin@epa.gov)>, Michael Swistak <[mswistak@utah.gov](mailto:mswistak@utah.gov)>, John Simmons <[jds@mocasystems.com](mailto:jds@mocasystems.com)>, Todd Hansen <[thansen@pcschools.us](mailto:thansen@pcschools.us)>, Peter Chamberlain <[PChamberlain@hoganconstruction.com](mailto:PChamberlain@hoganconstruction.com)>, <[rupton@pcschools.us](mailto:rupton@pcschools.us)>, Ryan Lapp <[RLapp@hoganconstruction.com](mailto:RLapp@hoganconstruction.com)>  
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All:

This email is to bring everyone onto the same sheet of music and to minimize the magnitude of this issue as rapidly as possible.

Today, our onsite technician identified a surface discharge from the site into silver creek. As stated in writing at the beginning of this project, this type of discharge is not allowable. Upon further investigation we identified that there has been a water discharge that went unseen since almost the start of the project. We have identified that the pumps have been pumping since near the beginning of the project and are turned on at approximately 8:00AM and shutoff at approximately 4:30PM M-F. The pump is rated at 40 gallons per minute. All Groundwater must be captured, held onsite, and properly characterized prior to discharge. Simply put, nothing leaves the site unless you brought it on there and it did not touch the tailings.

R&R has begun obtaining water samples from the creek today. We will expedite the turnaround of the samples. We will recommend waiting on the creek assessment until the end of the project. We have met our regulatory obligation for reporting to DERR. We have some defenses we can send to Hogan for what has been done but the regulations are clear. We are pulling water samples at the outfall, 15 feet downstream from the outfall and at this location about 5 miles away.

40°40'58.7"N 111°27'24.8"W

40.682968, -111.456876

Since this is classified as a navigable water way of the State, and it is classified as a spill (or illegal discharge) the Coast Guard and The Utah Division of Water Quality are now also involved.

Hogan MUST notify DEQ in accordance with their NPDES by COB today. Hogan shall also contact DEQ at the Spills hotline (this is a spill). The number is 801-347-9742.

PCSD - I recommend you prepare a statement for the press to release next week. Best to spin this our way vs waiting for KPCW and other locals to spin it themselves.

For all (Owner, Architect, Contractor, Subcontractor), please start preparing your statements now. We will all be answering for this.

Note: Since the water moves fairly quickly, I anticipate the water samples will not show anything. It is still needed and will be good for PR. It is the creek sediment that will be the bigger issue based on metal fall rates in the surface water.

I took the liberty of copying an email I sent to all parties on August 14, 2025. That email is pasted below.

All:

We were questioned by Hogan and Seng concerning this matter.

Hogan/Seng desire to discharge their groundwater without capture and potential disposal.

Here are the options available to you - Note: sampling of the GW must happen no matter which option is chosen. We can sample in place from a few potholes designated by an Environmental Engineer:

1. Capture and discharge or dispose based on results.
2. Discharge per SWPPP requirements - DEQ Solid Waste must approve the discharge.  
DEQ Water Quality must approve the discharge.
3. Discharge to the Sanitary sewer system. DEQ Solid Waste must approve the discharge.  
DEQ Water Quality must approve the discharge. POTW must accept the water, in writing.
4. Reinject the GW into the ground.

If the water tests hazardous, Option 1 is the only option available.

Professional Opinion

To expedite, I suggest Hogan call and discuss their SWPPP with DEQ immediately. I am anticipating this course of action will be denied pretty quickly and we can move to the other options. I do think if the levels are OK the POTW option could be an acceptable option.

Thank you  
Stephen

40°40'58.7"N 111°27'24.8"W

40.682968, -111.456876

Thank you  
Stephen



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Stephen S. Galley, CSP

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