

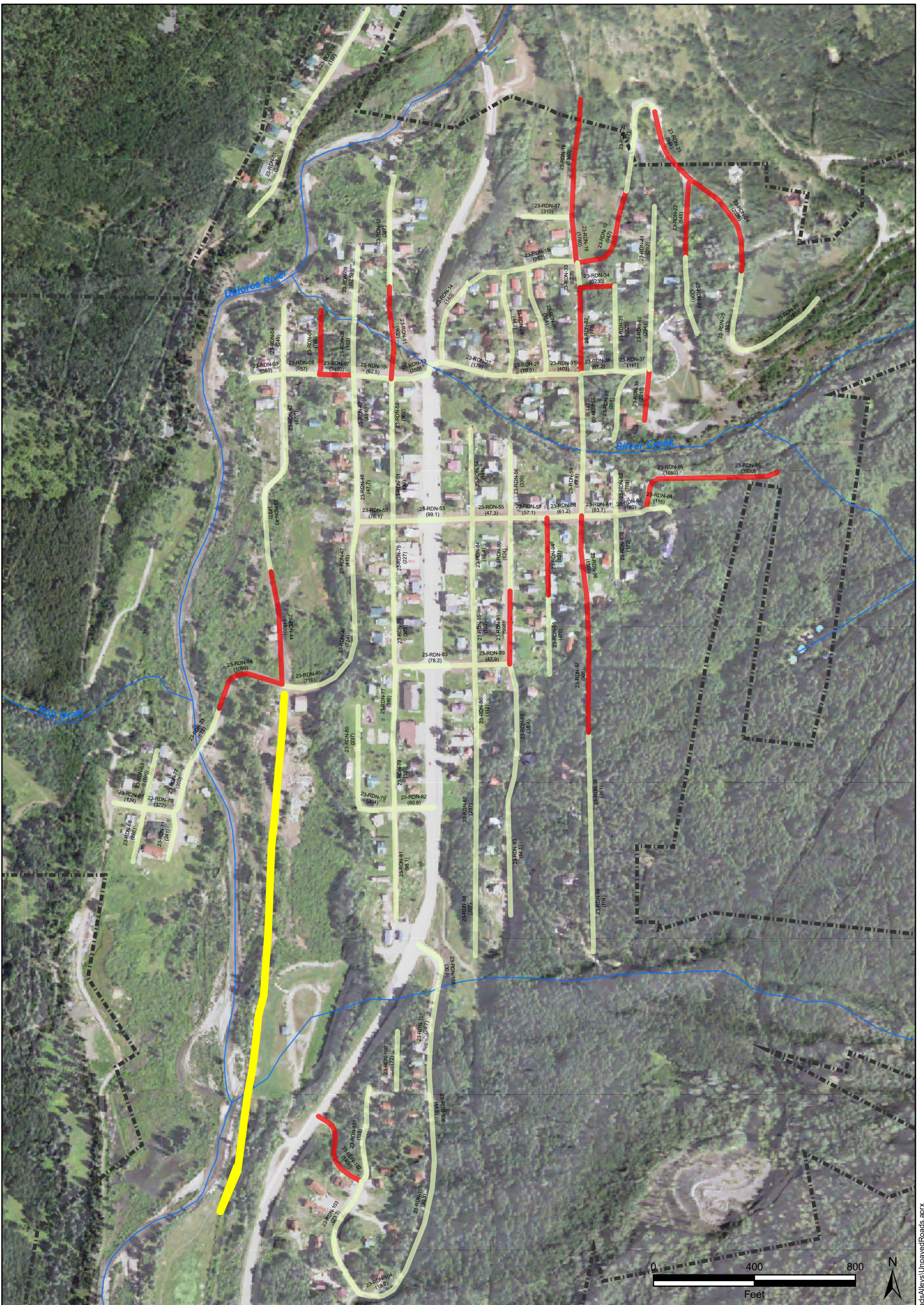
2023 Lead Concentrations in Unpaved Road and Alley Samples

The attached figure shows the results of sampling for lead in unpaved road and alley segments in the Town of Rico (the Town) performed by Atlantic Richfield (AR) in October 2023. The figure shows the lead concentration of each segment and is color-coded to show whether segments are above or below the Residential Lead Action Level of 761 mg/kg lead in soil.

The 2023 road and alley sampling was conducted because more than a decade had passed since prior sampling took place, and in that intervening period, a wide range of road maintenance and construction activities had occurred. Further, activities that affect the composition of the surface of unpaved roads and alleys over time—for example, road maintenance, application of road base, installation and maintenance of utilities, other excavation, and grading—would be anticipated to, over time, affect the lead concentrations in materials at the surface of roads and alleys. The Town, AR, and the Colorado Department of Public Health and Environment (CDPHE) wanted updated results before determining which portions of unpaved Town roads and alleys will require remediation under the Rico Townsite Soils Voluntary Cleanup Program (Rico VCUP). This approach is intended to assure that roads requiring remediation are in fact remediated and roads that do not require remediation are not remediated (to minimize unnecessary disturbance and dust).

The 2023 samples were collected per the CDPHE-approved Phase 1 VCUP Work Plan attached to the VCUP Application. Samples were analyzed for total lead in-field using an XRF spectrometer, and additional soil was retained and submitted for confirmation of lead concentrations by laboratory analysis. Although the Phase 1 VCUP Work Plan only required laboratory analysis for 10% of samples analyzed by XRF, AR elected to submit 100% of the samples for independent lab analysis, which is considered a more accurate and precise sampling approach. Identification of road and alley segments that are currently above or below the Residential Lead Action Level is based on the laboratory results. The Town's expert completed an independent review of the sampling approach, sampling results, and laboratory data sheets.

While the attached figure shows that the concentration of lead in soil at Water Tank Road tested above the Residential Lead Action Level, Water Tank Road is not maintained as a Town road for vehicular traffic, and the remediation of Water Tank Road is not included in the Rico VCUP road remediation program. AR intends to remediate Water Tank Road separately.



Legend

- 2023 Lead in Unpaved Road Samples (mg/kg)
- < 761 mg/kg Lead
- >= 761 mg/kg Lead
- Railroad Corridor, >761 mg/kg Lead. To be capped with clean material
- Rivers and Streams
- Town of Rico Boundary

Lead results are from Pace Analytical method 6010 ICP.



RICO, COLORADO	
2023 LEAD CONCENTRATIONS IN UNPAVED ROAD AND ALLEY SAMPLES 0 - 2" DEPTH	
DATE: OCT 22, 2024	FORMATION
By: DKG	ENVIRONMENTAL
For: BGH	