SOIL REMEDIAL ACTION PLAN

FORMER GENERAL ELECTRIC FACILITY, NORTH SALT LAKE, UTAH
130 EAST 1100 NORTH
NORTH SALT LAKE, UTAH

Prepared for:
General Electric Company
1 River Road 5-7W
Schenectady, New York 12345

PROJECT NO.: WDP0014
DATE: JANUARY 25, 2023

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January 25, 2023

Mr. Damian Foti
General Electric Company
1 River Road 5-7W
Schenectady, New York 12345

Dear Mr. Foti:

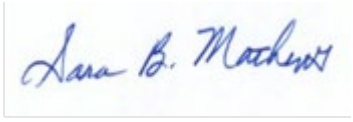
Subject: Soil Remedial Action Plan, Former General Electric Facility,
130 East 1100 North, North Salt Lake City, Utah
VCP No. C-102

WSP Environment & Infrastructure Solutions, Inc. (WSP) is pleased to provide the Soil Remedial Action Plan (RAP) for the above referenced Site. This Plan provides the criteria and methodology address the constituents of concern (COCs) in soil, including removal of soil impacted with PCBs and TPH. Remedial actions proposed for groundwater will be outlined under separate cover.

Please contact Brad Glisson at brad.glisson@wsp.com if you have any questions or comments regarding this report.

Yours sincerely,

Bradley K. Glisson, CHMM
Project Manager



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Encl.
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Soil Remedial Action Plan

Former General Electric Facility, North Salt Lake, Utah
130 East 1100 North
North Salt Lake, Utah
WDP0014

Prepared for:

General Electric Company
1 River Road 5-7W, Schenectady, New York 12305

Prepared by:

WSP

January 25, 2023

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1 INTRODUCTION

WSP USA Environment & Infrastructure Inc. (WSP USA), formerly Wood Environment & Infrastructure Solutions, Inc. (Wood), on behalf of General Electric Company (GE), has prepared this Soil Remedial Action Plan (RAP) for the former GE facility located in North Salt Lake, Utah (Site). GE applied to the Utah Department of Environmental Quality (UDEQ), Division of Environmental Response and Remediation (DERR) for inclusion of the Site in the Voluntary Cleanup Program (VCP) on June 19, 2020 and was eligible to participate by agreement under VCP on October 5, 2020. The Site was assigned VCP number C-102.

Various site characterization activities were conducted at the site from 1982, directed by the Utah Bureau of Solid and Hazardous Waste, UDEQ DERR, U.S. Environmental Protection Agency (EPA), and GE. The previous environmental site assessments are described in other reports (Amec, 2017, and Wood 2020). Environmental sampling events representing current site conditions were conducted from 2017 to 2022 for soil and groundwater. These events determined that concentrations for various constituents were above screening criteria, including arsenic, polychlorinated biphenyls (PCB), and total petroleum hydrocarbons (TPH) in soil, and arsenic, PCB, TPH and volatile organic compounds (VOCs) in groundwater. The site characterization information for both soil and groundwater are presented in the following sections; however, the remedial action described herein is focused on soil only.

In 2019, an interim corrective action including focused soil excavation and off-site disposal was completed to address the south-central portion of the Site with PCB impacted soil. Additionally, four quarters of groundwater monitoring has been completed between September 2021 and September 2022.

The purpose of this Soil RAP is to address the constituents of concern (COCs) in soil, as confirmed by GE and the UDEQ DERR. The Soil RAP outlines remedial actions proposed to remove soil impacted with PCBs and TPH. Upon receiving the UDEQ DERR approval of the Soil RAP, GE will execute the soil remedial actions and request an acknowledgement of completion from DERR. Remedial actions proposed for groundwater will be outlined under separate cover.

1.1 SITE LOCATION, DESCRIPTION, AND PHYSICAL CHARACTERISTICS

The Site owned by GE, comprises approximately 14.95 acres and two vacant buildings. It is located at 130 East 1100 North in North Salt Lake City, Davis County, Utah. The approximate geographic coordinates for the Site entrance are North 40.86147° and West 111.90814°. The Site location map is shown as Figure 1, and a general Site layout with adjoining properties is shown on Figure 2.

The main building is a 61,040 square feet (sq-ft) slab-on-grade building, and the second is an approximately 600 sq-ft slab-on-grade, brick facade building previously utilized as the

hazardous materials storage building. A septic leach field, abandoned in 1983, was located in the southeast corner of the Site, and former evaporation ponds were located in the southwest corner of the Site. A former, inactive oil/water separator is located within a fenced area in the south-central portion of the Site (southern yard area). The remainder of the Site consists of an east storage area, a loading dock area west of the building (west loading dock area), storage conex, one paved and one unpaved parking area, and grass-covered areas. A chain-link fence surrounds the storage yards and is along the southern and eastern boundaries of the Site. The Site, identified as Davis County Parcel ID: 060940076, is located within the city limits of North Salt Lake City, Davis County, Utah and is zoned as commercial. The surrounding properties are also commercial and are predominately industrial facilities and office buildings, with the exception of a mobile home park to the east.

Historical operations of the facility are summarized in the *Phase I Environmental Site Assessment* dated March 2017 (Amec 2017), the *Phase II Environmental Site Assessment* dated February 2020 (Wood 2020) and the *Site Characterization Work Plan*, dated July 2021 (Wood SCW 2021a).

The previous environmental site assessments conducted by Wood and others identified historical COCs in the groundwater at concentration levels exceeding the EPA drinking water maximum contaminant levels (MCL) or tap-water (TW) regional screening levels (RSL), including certain VOCs, SVOCs, arsenic, and PCBs. The comparison to MCL or TW was in accordance with *UDEQ DERR VCP Summary*. Additionally, TPH diesel range organics (DRO) exceeding the UDEQ DERR Initial Screening Levels (ISL) in soil in accordance with the UDEQ DERR, *Guidelines for Utah's Corrective Action Process for Leaking Underground Storage Tank Sites* (UDEQ DERR, March 2015), and PCBs in soils exceeded EPA regional screening levels (RSLs).

1.2 PROJECT BACKGROUND

According to historical documents, General Motors Division built the facility in 1955 as a locomotive repair shop. General Motors sold the property in 1968 to Univac Guidance Systems, who operated at the Site until they sold the property to GE in 1971. GE utilized the Site for the cleaning, maintenance, and repair of transformers and electric motors until 2017 when it closed. The Site underwent a comprehensive facility decommissioning in 2016 and 2017, which included equipment characterization and disposition, inventory and refuse removal, trade waste and wastewater drain sump cleaning and abandonment, and interior building industrial cleaning, project-generated waste transportation and off-site disposal, etc. The Site and buildings are currently empty and unoccupied.

1.3 SITE CHARACTERIZATION SUMMARY

1.3.1 PHASE I ACTIVITIES

A Phase I Environmental Site Assessment (ESA) was completed by AMEC Foster Wheeler Environment & Infrastructure Solutions, Inc., a former Wood entity company, in March 2017 (Amec 2017). The Phase I ESA was completed in general accordance with the scope and limitations of American Society for Testing ad Materials (ASTM) Standard E 1527-13, "Standard Practice for Environmental Assessments: Phase I Environmental Site Assessment Process."

The findings included an Activity and Use Limitation (AUL) for the Site. The AUL was recorded on the Quit Claim Deed on January 11, 2007, and indicated that a restrictive covenant was in place restricting the use of groundwater.

Additional findings of the Phase I ESA are summarized in Table 1 as follows:

Table 1 Findings from the 2017 Phase I ESA

Location	Findings	Comments
Main Building	Oil in pits, surface stains, pressure washing of transformers, trade waste sub-floor piping	Historic use of rebuilding transformers and potential for PCBs, historic chemical usage, discharge to settling ponds on southwest corner of Site
Southern Yard	Two settling ponds, oil water separator, historic pond east of oil water separator, concrete vault pumping water to weir box, septic system with leach field, two monitoring wells	Historic chemical usage, historic groundwater monitoring
Former hazardous waste storage building	Transformer storage	Potential for PCBs
Loading Dock	Storm drains with unconfirmed discharge	Historic chemical usage

1.3.2 PHASE II ACTIVITIES

WSP USA (formerly Amec and Wood) completed Phase II Environmental Site Assessments (ESA) between June 2017 and October 2019 (Wood 2020) and identified VOC, SVOC, arsenic, and PCB in groundwater above EPA MCLs, and RSLs and TPH DRO exceeding the UDEQ DERR ISLs. VOC, PCB, arsenic, hexavalent chromium, and bis(2-

ethylhexl)phthalate (DEHP) were also detected in soil exceeding EPA RSLs and TPH-DRO exceeding UDEQ DERR ISLs.

A summary of the COCs and associated areas of concern (AOC) identified in the Phase II ESA is summarized in Table 2 as follows:

Table 2 Contaminants of Concern and Associated Areas of Concern

Environmental Media	Contaminants of Concern	Physical Location	AOC
Soil and Groundwater	PCB	Loading dock, West of building	01
Soil	TPH-DRO	Loading dock, West of building Former drums storage area	01
Soil	PCB and Hexavalent Chromium	Oil/Water Separator, South of building	02
Soil	Arsenic	Evaporation Ponds, field south of the building	03
Soil	PCB, VOCs, SVOCs	Trade waste piping under building and South of building	04
Soil	bis(2-ethylhexl)phthalate (DEHP)	Septic leach field located in southeast portion of site	05
Groundwater	VOCs, SVOC, arsenic	Site-wide	06

The Phase I ESA and the Phase II ESA were provided as the Environmental Assessment (EA) for the site under VCP number C-102.

1.3.3 SITE CHARACTERIZATION WORK PLAN

In July 2021, subsequent to the Phase I and II ESAs, a Site Characterization Work Plan (SCW) was submitted to UDEQ DERR, which included a Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP). The SCW and SAP/QAPP were approved by the UDEQ DERR in August 2021. The SCW described the additional soil and groundwater sampling and analysis procedures to be followed for the supplemental characterization activities. Data acquired during the SCW was be used to develop this RAP and implement remediation activities.

In October 2021, GE also completed a supplemental soil assessment for further characterization of arsenic, and chromium, and delineation of TPH-DRO and PCB impacts in soil at depth in the loading dock area west of the building and the oil/water separator area, south of the building, in accordance with the SCW. Twenty-three soil boring locations (B-1000 through B-1022) were advanced by direct push technology at locations identified and sampled in accordance with the SCW.

1.3.4 NATURE AND EXTENT OF CONSTITUENTS OF CONCERN DETECTED IN THE SUPPLEMENTAL SOIL ASSESSMENT AND GROUNDWATER MONITORING EVENTS BETWEEN 2021 AND 2022

Soil

Concentration levels of COCs in the subsurface soil exceeding U.S. EPA RSLs for commercial/industrial criteria include arsenic, PCB 1254, PCB-1260, and exceeding UDEQ DERR ISLs is TPH-DRO. Arsenic was detected in surface soil at concentrations that ranged from 4.26 mg/kg to 14.4 mg/kg, which is below background, and in subsurface soil at concentrations that ranged from 1.58 mg/kg to 177 mg/kg.

PCB 1254 and PCB-1260 were detected in the subsurface soil above EPA RSLs in the west loading dock area and in the southern yard area. TPH-DRO was detected in subsurface soils in the west loading dock area at concentration levels ranging from 510 mg/kg to 12,000 mg/kg, as referenced in Table 2.

Groundwater

Seven constituents were identified as COCs in groundwater exceeding U.S. EPA MCLs and/or RSLs, including TCE, cis- 1,2-DCE, 1,1-DCE, 1,4-dioxane, 1,1-DCA, arsenic (total and dissolved), PCB 1254, and TPH-DRO exceeding UDEQ DERR ISLs. PCBs were removed from the groundwater monitoring program with UDEQ approval.

1.4 SUMMARY OF HUMAN HEALTH AND ECOLOGICAL RISK EVALUATION

A HHERA was submitted to UDERR in May 2022 (Wood, 2022). The Risk Assessment was completed to estimate the potential risks to human health and the environment from the historical operation at the Site, and to establish site-specific soil and groundwater cleanup levels that are protective of human health and the environment.

The risk assessment, which was completed in support of the VCP requirements, was conducted in accordance with guidance provided by the Utah Department of Environmental Quality, Division of Environmental Response and Remediation (UDERR) and federal U.S. Environmental Protection Agency (EPA) risk assessment guidance. UDERR reviewed the HHERA and provided verbal approval on August 25, 2022.

Various site characterization activities as early as 1982 have been described in other reports (Amec, 2017, and Wood, 2020), and those considered relevant to the risk evaluations were represented in the risk assessment. The analytical data associated with the more recent supplemental soil and groundwater environmental assessments conducted between 2021 and 2022 were incorporated in the quantitative risk evaluations presented in subsequent sections of the report.

The maximum detection of each constituent was compared to the current EPA Industrial RSL for soil, as presented in the EPA RSL Summary Table (November 2021) (EPA, 2021). The RSLs used in the screening process are risk-based screening levels calculated for carcinogenic compounds based on an acceptable cancer risk level of 1E-06, or for

noncarcinogens, calculated based on an acceptable non-cancer hazard of 1. If the maximum detected concentration was greater than the Industrial RSL for soil, the constituent was identified as a COC for direct contact with soil and retained for further evaluation in the HHERA. The maximum concentrations of the metals were also compared to background data. A heavy metal constituent was identified as COC if the maximum concentrations exceed both the EPA Industrial RSL and naturally occurring background concentrations. TPH-GRO and TPH-DRO were compared to ISLs of 150 mg/kg and 500 mg/kg, respectively.

Site-specific receptors and exposure routes were identified, and conservative estimates of potential risk were quantified for two potential human receptor populations, including a future on-site commercial/industrial worker and a future on-site construction worker. The potential presence of a current/future caretaker or trespasser receptor and a future maintenance/utility worker is acknowledged. However, risks associated with these receptors were not quantified, as commercial/industrial worker and construction worker have greater potential for exposure due to increased contact rates, and frequency and duration of exposure to site media. Per discussions with the UDERR, the risk assessment was conducted assuming an environmental covenant will be placed on the property, restricting groundwater use to monitoring only and restricting the Site to commercial/industrial usage. Therefore, a hypothetical future residential population was not addressed for either exposure to soil or groundwater.

Soil

The screening of site data to identify the COCs to be evaluated in the risk assessment indicated that PCB Aroclor 1260 is the only COC in surface soil, and arsenic, PCB Aroclor 1254, PCB Aroclor 1260 and TPH-DRO are COCs in subsurface soil. TPH-GRO was not identified as a COC, because the 95% UCL for TPH-GRO in soils 0-20 feet bgs was less than the ISL.

The future commercial/industrial worker and the future construction worker are considered the receptor populations most likely to be present at the Site in the future. The commercial/industrial worker is considered to have the potential for exposure to surface soil from 0-2 feet bgs. As a conservative measure, this receptor was also evaluated for potential exposure to soil from 0-20 feet bgs in the event subsurface soils are brought to the surface during future construction activities. The construction worker was evaluated for potential exposure to COCs present in surface soil 0-2 feet bgs and soil from 0-20 feet bgs. The cumulative soil cancer risks for the industrial worker (1E-05 for potential exposure to surface soil in the southern yard area) and the construction worker (2E-06 for potential exposure to soil 0-20 feet bgs in the southern yard area) are within the acceptable carcinogenic risk range of 1E-06 to 1E-04. The cumulative non-cancer hazards are less than the acceptable level of 1.

PCB Aroclor 1260 is the primary contributor to risk associated with surface soil in the southern yard area. If location B-1001-0-2.5' and B-1003-0-2.5' are addressed, PCBs would be associated with acceptable cancer risk (≤1E-06), and non-cancer hazards (<1) site-wide and in the southern yard area as well as in the west loading dock area yard. Arsenic is the primary contributor to risk associated with exposure to soil from 0-20 feet bgs. Given its distribution in soil, particularly where any elevated concentrations are found at depth

(generally > 10 ft bgs) at the Site, however, soil remedial action (e.g., soil excavation) to address arsenic is not practical or warranted, and will be addressed though site and soil management, select engineering controls and the future environmental covenant. The evaluation of the TPH-DRO and the associated samples analyzed for BTEX and PAHs indicates that the residual TPH-DRO present at the site is likely a heavier aliphatic carbon fraction that is not volatile or very mobile. TPH-DRO was detected in soil in the west loading dock area yard at concentrations greater than the ISL, and future actions to address TPH-DRO will be evaluated in the RAP for the Site.

Groundwater

Eight COCs were identified in groundwater, including: 1,1-DCA, 1,1-DCE, 1,4-dioxane, cis-1,2-DCE, TCE, arsenic, PCB Aroclor 1254 and TPH-DRO. UDEQ has subsequently agreed to the removal of PCB from the groundwater monitoring program. TCE is the only VOC detected in groundwater at a concentration greater than the corresponding VISL. Therefore, TCE is the only constituent identified as a COC for the potential vapor intrusion pathway in a hypothetical future building located near the monitoring wells with TCE concentrations greater than the VISL. As noted previously, remedial actions proposed for groundwater will be outlined under separate cover.

The criteria and methodology for remediation of the Site to eliminate exposure pathways and reduce risk are presented in Section 2.0.

1.5 FUTURE LAND USE

The site is currently vacant, and potential future site use will be restricted to commercial/industrial. GE will place environmental covenants on the Site with a Site Management Plan (SMP) to control or eliminate the potential for risk associated with future use and intrusive activities that may expose the subsurface soil and groundwater.

2 REMEDIAL ACTION PLAN

2.1 REMEDIAL OBJECTIVES

The RAP was developed on the basis of the HHERA, as approved by UDEQ DERR on January 20, 2023, for protection of human health and the environment under current and reasonably anticipated future site conditions and use. This section identifies the objectives of soil remedial actions at the site to address PCB impacted soil in the southern yard area and TPH-DRO impacted soil in the west loading dock area; and to manage exposure to the presence of arsenic in site-wide subsurface soil.

The focused areas with PCB and TPH impacted soil were delineated during the supplemental soil assessments through the advancement of numerous soil borings and vertical soil sample collections. The supplemental soil assessments confirmed the primary areas of the Site planned for targeted soil remedial action. Detailed information regarding the implementation of the RAP is presented in subsequent sections of the document, e.g., under the Remedial Action Areas (Section 2.2) and Site Management Plan (Section 2.4).

2.1.1 PCB IN SOIL

The Soil RAP has established the soil clean up objective for the removal of total PCBs at concentrations greater than 10 mg/kg. The 10 mg/kg clean up objective was selected, as it is equivalent to the EPA's high occupancy limit under the Toxic Substances Control Act (TSCA) for PCBs in soil with a cap. The minimum requirements for the cap are 10-inches compacted soil, or a minimum of 6-inches of asphalt or concrete. By selecting a remediation objective of 10 mg/kg, the removal action will eliminate unacceptable direct contact risk for soils at a commercial site.

The focus of the remedial action will be to address the total PCB concentrations detected greater than 10 mg/kg in soil located in the southern yard areas, as shown in Figure 3. In addition, total PCB concentrations greater than 1 mg/kg in the proximity of excavation will also be included in the removal action, which are shown as highlighted in the figure. If the soil cleanup objective of 10 mg/kg cannot be achieved through feasible means of remediation (i.e., excavation), then exposure to these areas will be controlled through an engineered barrier or cap. High occupancy areas with concentration levels greater than 1.0 mg/kg, but less than 10 mg/kg, will be covered with a cap meeting the requirements of paragraphs 40CFR761.61 (a)(7) and 40CFR761.61 (a)(8).

2.1.2 TPH-DRO IN SOIL

The Soil RAP has also established a soil cleanup objective for TPH-DRO of 5,000 mg/kg.

The horizontal and vertical delineation of TPH in soil indicated TPH was present as TPH-DRO with a carbon fraction range of C10-C28. The concentrations of indicator compounds such as benzene, toluene, ethylbenzene, xylenes, and the polycyclic aromatic hydrocarbons (PAHs) in corresponding samples were either non-detect or below

screening levels. The sample data support the conclusion that the residual TPH is from weathered fuels consisting of low-mobility compounds with higher molecular weight (greater than 8 carbon atoms or >C8), higher adsorption coefficients, and lower solubility relative to lighter weight carbon fraction ranges (e.g., C3 to C6 compounds). The residual TPH-DRO (C10-C28) would tend to sorb to soil particles and have limited potential to migrate through leaching to groundwater. The residual TPH-DRO is likely a heavier weight aliphatic carbon fraction that is not volatile or mobile in the environment. Based on the future land use as Industrial/Commercial, the development of a Site Management Plan, which includes on-going management of the former storage area and groundwater monitoring and recording of an environmental covenant, the soil cleanup objective for TPH-DRO was set to 5,000 mg/kg.

Results of groundwater samples from five (5) monitoring wells in the loading dock area exhibited concentrations of TPH-DRO below the screening criterion of 1 milligram per liter (mg/L) for two monitoring events in 2022, and free phase product has not been detected in groundwater for four (4) consecutive quarterly monitoring events or any of the soil samples collected to date. In addition, fractionization of TPH in groundwater from two groundwater wells indicated no detections for compounds above laboratory reporting limits. Based on the assessment results, removal of soils greater than the clean-up goal of 5,000 mg/kg for TPH-DRO will further minimize soil impacts and enhance the natural degradation process below levels of concern for migration to groundwater.

For TPH-DRO, the focus of the remedial action will be to address the TPH-DRO concentrations detected at concentrations greater than 5,000 mg/kg in soil located in the west loading dock area, as shown in Figure 4. Specific locations where soil will be removed are identified in Section 2.2.2.

2.1.3 ARSENIC IN SOIL

The HHERA demonstrated that arsenic in surface soil was detected at concentrations below screening criteria (i.e., background and the UDEQ arsenic cleanup goal of 25 mg/kg) and required no soil excavation or equivalent intrusive remedial action.

Arsenic in subsurface soil, however, was identified to be the primary COC for exposure evaluated collectively for soil depth intervals of 0 to 20 feet below ground surface (bgs). Arsenic exhibits both carcinogenic and noncarcinogenic properties and the initial screening criterion for arsenic in soil, the EPA Industrial RSL of 3 mg/kg, is based upon its carcinogenic properties and an acceptable target cancer risk of 1E-06. UDEQ has an acceptable cancer risk range of 1E-06 to 1E-04 which corresponds to a range in arsenic concentrations of 3 mg/kg to 300 mg/kg. The EPA Industrial RSL based on the noncarcinogenic properties of arsenic and the UDEQ acceptable noncancer hazard quotient of 1 is 480 mg/kg. Therefore, the range of acceptable arsenic concentrations of 3 mg/kg to 300 mg/kg is also protective of potential noncarcinogenic effects from exposure to arsenic in subsurface soil.

As noted previously, the presence of arsenic in subsurface soil is ubiquitous and soil excavation or other intrusive remedial action to address this compound is not practical or warranted. Concentrations of arsenic in subsurface soil ranged from 1.58 mg/kg to 177 mg/kg and are within the acceptable range of 3 mg/kg to 300 mg/kg.

Based on the future land use as Industrial/Commercial, the development of a Site Management Plan (including Soil Management Plan), which includes management of site-wide exposure to subsurface soil, and recording of an environmental covenant, the soil cleanup objective for arsenic in soil was set to the acceptable range of 3 mg/kg to 300 mg/kg.

2.1.4 CLOSURE OF REMEDIAL OBJECTIVES IN SOIL

Based on the HHERA, the projected residual risk for soil remaining on the Site after the soil excavation will be acceptable for a future non-residential use Site. Using currently available data, the planned soil excavations should achieve total PCBs (and individual Aroclor) concentrations below 10 mg/kg and TPH-DRO concentrations below 5,000 mg/kg for the Site. PCBs are not of concern for the soil migration to the groundwater pathway, as Aroclors have not been detected in the dissolved phase in groundwater, and with DERR approval, were previously removed from the Site's semi-annual groundwater monitoring program. TPH DRO are not of concern for soil migration to the groundwater pathway, because detections of DRO were below the screening criterion of 1.0 mg/L, and fractionization compounds were not detected from the two groundwater monitoring wells in the west loading dock area.

2.2 REMEDIAL ACTION AREAS

2.2.1 SITE PREPARATION

Prior to excavation, certain tasks and project coordination efforts will need to be completed. The table below summarizes these tasks and the responsible parties, which are dependent on contractor availability and agency approvals.

Task Description	Responsible Party	Anticipated Schedule
Issue Notice to Proceed	GE	January 2023
Preparation of Bid Package	Consultant (WSP E&I Solutions, Inc.)	January 2023
Remediation Contractor Selection	GE and Consultant (WSP E&I Solutions, Inc.)	February 2023
Coordinate with Selected Analytical Laboratory	Consultant (WSP E&I Solutions, Inc.)	February 2023
Coordinate with Selected Waste Disposal Facilities	TBD and Consultant (WSP E&I Solutions, Inc.)	February 2023
Notification of Corrective Action Work to DERR	GE and Consultant (WSP E&I Solutions, Inc.)	February 2023
Mobilize to Site	Selected Excavation Contractor (TBD) and Consultant (WSP E&I Solutions, Inc.)	March 2023

Following initial mobilization to the Site, the decontamination area, exclusion zone, and staging area will be established on-Site. The extent of these areas may be modified

during pre-implementation discussions with the selected remedial contractor or in the field based on site conditions. Additional signs will be posted at the Site stating, "RESTRICTED AREA – AUTHORIZED PERSONNEL ONLY." In addition, support equipment, an office trailer, and portable sanitary services will be brought to the site and placed outside the decontamination area.

Site preparation will include marking the subgrade utilities (private utility contractors), clearing the work area, marking the estimated limits of excavation, establishing entrance points to the work area and exclusion zones, installation of temporary utility services (i.e., power, telephone, water source, if needed), and delivery and set-up of materials and equipment.

2.2.2 EXCAVATION PROCEDURES

Prior to beginning field activities, a Health and Safety meeting shall be held to review safe operating procedures with on-site personnel, including subcontractors. A health and safety meeting will be held each day before beginning work and following any extended breaks during the day. Following the health and safety briefing, on-site personnel will be given the opportunity to read the site-specific Health & Safety Plan (HASP) and must sign the HASP indicating they understand its contents.

The project health and safety officer will also oversee daily operations and communication with the GE project manager and designated site construction project manager. The health and safety officer will ensure that on-site personnel don or have the proper personal protective equipment (PPE), such as work gloves, nitrile gloves, safety glasses, hard hats, steel-toed boots, dust masks, hearing protection, air-purifying respirators with particulate filters, Tyvek® suits, water-resistant suits, air-supplied respirators, and fall protective harnesses. The use of PPE is described in the HASP. The health and safety officer will also be responsible for conducting dust monitoring and implementing dust controls, which are outlined in Section 2.2.6.

Remedial activities shall consist of soil excavation, soil handling, temporary on-site staging and/or containerization, transportation, and off-site disposal of soil impacted above the remedial action objectives of the TSCA high occupancy standard of 10 mg/kg total PCBs with a cap and 5,000 mg/kg TPH-DRO.

Depending on the schedule and number of trucks available to transport excavated soil from the Site, development of a temporary soil staging area may be necessary, where direct loading of sol is not feasible. If necessary, a temporary soil staging area will be constructed in a designated area on-Site. Soil will be stockpiled within a designated bermed area lined with polyethylene sheeting under and over the stockpiles, pending off-site transport and disposal or placed into covered roll-off containers. If stockpiled, the soil will be covered with polyethylene sheeting each day to prevent material from becoming airborne or saturated during increased wind or rainy periods while temporarily staged at the Site. Silt fencing will also be put in place around the stockpiled soil to prevent any potential particulate runoff during precipitation events.

Asphalt and/or concrete cover excavated from the site will be transported offsite for proper disposal. The cover materials disturbed during excavation activities will be characterized and transported off-site for disposal at an appropriately permitted facility based on the as-found concentrations. The areas of excavation and capping are described below and presented on Figures 4 and 5. Soil will be excavated to the depths noted for each area and boring, as identified on Table 4 below. Excavated soil will be transported for proper off-site disposal to the appropriately licensed landfill based on the detected concentration levels, as well as post-excavation characterization results (i.e., Sub-title D or TSCA Sub-title C).

Table 4 Summary of Soil Locations to be Excavated

Sample ID	Sample Date	PCB 1260	TPH DRO
		Concentrations in mg/kg	
B-9 6-7 ft-bgs	6/14/2017	NA	5,570
B-10 4-5 ft-bgs	6/14/2017	NA	12,000
B-11 4-5 ft-bgs	6/14/2017	NA	7,210
B-11 8-9 ft-bgs	6/14/2017	NA	6,120
B-1003 0-2.5 ft-bgs	10/12/2021	13.0	NS

Notes: NA = Not Applicable, NS = Not Sampled

As summarized on Table 4 and shown on Figures 4 and 5, subsurface excavation will be conducted in areas where total as-found PCBs have been detected at concentrations greater than 10 mg/kg, and TPH-DRO has been detected at concentrations greater than 5,000 mg/kg. The limits of excavation are shown on the figures.

For the southern yard area, the excavations will remove soil with total detected PCB concentrations greater than 10 mg/kg. If soils are left in place that exceed 10 mg/kg, a cap will be placed over those areas to eliminate potential direct exposure to those soils. The areas identified in this RAP will be addressed through soil excavation and subsequent restoration to control and/or eliminate soil impacts previously identified in these areas to comply with EPA RSLs for Industrial Sites.

For the west loading dock area, the excavations will remove soil with TPH-DRO greater than 5,000 mg/kg. If soils are left in place that exceed 5,000 mg/kg, a cap will be placed over those areas to eliminate potential direct exposure to those soils. Each area of assessment will be addressed until exposure to soil in these areas is controlled or eliminated, and the corresponding representative concentrations for the remaining soil comply with the site-specific TPH-DRO cleanup objective of 5,000 mg/kg.

After the impacted soil is removed at each location, post-excavation confirmation soil samples will be collected from the excavation, and samples will be split with DERR as requested, to document removal of the impacted soil from the Site. Based on the analytical results, where post-excavation soil confirmation samples exceed the remedial objectives noted herein, the excavation limits may be extended as necessary and subsequently re-sampled to confirm completeness. Excavation activities will include

visual inspection of soil and the results of post-excavation confirmation samples. Post-excavation confirmation soil sampling is discussed in Section 5.2.3.

Site Restoration:

Following evaluation of the confirmation sampling results demonstrating that excavated soil with PCBs exceeding 10 mg/kg or TPH exceeding 5,000 mg/kg, respectively, have been removed or properly capped to eliminate potential direct exposure, the excavated areas will be backfilled with certified clean fill, and the areas will be restored to the approximate original grade and conditions. Before being brought to the Site, a sample of the proposed backfill will be analyzed for VOCs, SVOCs, PCBs, pesticides/herbicides, total petroleum hydrocarbons, and Resource Conservation and Recovery Act (RCRA) metals and compared to EPA RSLs. The area will then be capped with in kind surface materials.

2.2.3 CONTINGENCY PLAN

If an unexpected condition should arise during the remedial action, DERR will be contacted for consultation on issues that may affect the implementation of the RAP.

2.2.4 CONFIRMATION SAMPLING AND DISPOSAL

During field activities, the approved Quality Assurance Project Plan (QAPP) and Site Characterization Workplan for the Site will be utilized (Wood, 2020), which includes Standard Operating Procedures (SOPs). Each soil sample will be labeled and stored in an iced cooler for shipment to the laboratory using proper chain of custody protocol. Table 5 summarizes the sample containers, preservation techniques, and holding time criteria for the COCs in soil at the Site. In addition to the approved QAPP, field personnel will adhere to industry accepted standard operating procedures (SOPs) while conducting field activities. Documentation of applicable SOPs can be provided to the UDEQ DERR upon request. Any deviations from or supplemental activity to the QAPP will be documented in an Addendum and provided to DERR.

Table 5 Sampling and Analytical Method Requirements

Parameter	Matrix	Analytical Method	Containers per Sample	Preservation Requirements	Max Holding Time
PCBs	Soil	8082A	Soil: 1 Type A	Chill to 4˚ C.	Extract within 7 days, analyze within 40 days
Diesel Range Organics	Soil	8015C	Soil: 1 Type A	Chill to 4˚ C.	Analyze within 14 days

Note 1: Type A – four-ounce wide-mouth glass with Teflon liner

Quality Assurance/Quality Control Samples

Quality assurance/quality control (QA/QC) samples will be collected by field sampling personnel, including matrix spike/matrix spike duplicates, duplicate samples, equipment rinsate blanks, and trip blanks, in accordance with the QAPP (Wood, 2021) to verify the validity of the confirmation soil sample analytical results. Following sample collection, the containers will be placed immediately in a cooler with sufficient sealed bags of ice to maintain the samples at or below 4°C. Samples will be shipped via overnight courier or hand delivered to the laboratory under proper chain of custody protocol. The QA/QC samples will include the following:

- MS/MSDs – one per 20 samples;
- Blind Duplicates – one per 20 samples;
- Equipment rinsate blanks – one per 20 samples or one per day; and
- Trip blanks – one per cooler with sample containers for TPH analyses.

2.2.4.1 PCB POST EXCAVATION CONFIRMATION SAMPLING

PCB post-excavation confirmation sampling will be conducted in accordance with 40 CFR 761 Subpart O Sampling to Verify Completion of Self-Implementing Cleanup and On-site Disposal of Bulk PCB Remediation Waste and Porous Surfaces. Post-excavation confirmation samples will be collected laterally along the base and vertically on the walls of the excavations. The lateral and vertical soil confirmation samples will be collected at frequencies to characterize the remaining in-situ soil of each excavation using a 10 feet x 10 feet grid pattern. Each sampling point will be collected approximately where the grids intersect. The sample ID will identify the excavation area, grid number intersection, and depth.

Up to nine sampling points, as described in 40 CFR 761.289, will be composited to comprise a composite confirmation sample; for a 4 to 1 (4:1) ratio. Composite sampling will be conducted in the field but can also be performed by the laboratory. If the results of post-excavation soil confirmation sampling exhibit soil data samples results exceeding the clean-up objectives of 10 mg/kg total PCBs on the side walls or base of the excavation, then additional soil excavation and confirmation sampling will be conducted as needed, at these post-excavation confirmation sample locations. Alternatively, a cap will be placed over those areas to eliminate potential direct exposure to those soils.

Soil confirmation samples will be collected in association with the area of PCB excavation. Soil samples collected from shallow excavated areas (less than or equal to four feet bgs) will be collected using stainless-steel trowels. The trowel will be decontaminated, examined for cleanliness, and checked for defects prior to collection of each soil sample. A description of the location of the sampling area, field observations, and sample details will be recorded in a field notebook. For safety reasons, personnel will not be allowed into excavations exceeding four feet in depth. Soil confirmation samples from excavations greater than four feet bgs will be brought to the surface using the excavation equipment and collected using stainless steel or disposable tools.

Once the laboratory analytical results are available, the post-excavation confirmation soil samples will be included in the databases for each area, and representative concentrations will be recalculated to confirm compliance with the remedial action plan. If the remedial objectives are not achieved through initial soil excavation activities, additional soil excavation and post-excavation delineation sampling may be conducted as

detailed above. If subsequent target soil excavation efforts still do not meet the above-noted clean-up objectives, the area will be capped to eliminate potential direct exposure to those soils and will include a minimum of ten inches of compacted soil or six inches of asphalt (40CFR761.61(a)(7)).

2.2.4.2 TPH SOIL EXCAVATION

Areas of visible oil staining in the west loading dock area shall be over-excavated prior to sampling. Soil confirmation samples from excavations greater than four feet bgs will be brought to the surface using the excavation equipment and collected using stainless steel or disposable tools. Soil samples shall be obtained from the excavation floor. If bedrock is encountered during over-excavation, a soil sample shall be collected at the soil/bedrock interface. If excavation depths encounter groundwater before reaching the terminus of the excavation, DERR will be contacted for consultation on the path forward for sampling. If perched water or free-liquids are encountered (i.e., construction water), it will be managed with the excavated soil to meet disposal requirements. Management of saturated media will occur within the excavation by creation of stockpiles and allowing the draining of excess water/free-liquids inside the excavation. Excavations will be backfilled as noted in Section 2.2.2. The area will be capped as noted herein.

Based on visual observation and/or field screening with a Photoionization Detector (PID), post-excavation confirmation soil samples shall be collected from the zone of highest suspected impact. Samples will be collected from the excavation side walls and on the bottom of the excavations. Based on the anticipated size of the three (3) excavations in the west loading dock area, a minimum of five (5) samples will be collected per area (minimum 15 samples total) from the excavation floor and walls and analyzed for TPH-DRO. In addition, samples will be collected for analysis of PCBs from the southwest and southeast west loading dock excavation areas per Section 2.2.4.1.

2.2.4.3 TRANSPORTATION & OFF-SITE DISPOSAL

Excavated soil will be transported for off-site disposal to an appropriately licensed landfill based on the analytical data (i.e., Subtitle D or TSCA Subtitle C landfill). Depending on the schedule and number of trucks available to transport excavated soil from the Site, where direct loading is not feasible, development of a temporary soil staging area may be necessary. A temporary soil stockpile may consist of soil being placed in a bermed area lined with polyethylene sheeting or placed into covered roll-off containers. If stockpiled, the soil will be covered with polyethylene sheeting to prevent material from becoming airborne or saturated during increased wind or rainy periods while temporarily staged at the Site.

Excavated soil will be stockpiled on-site and further characterized for waste profiling and disposal to confirm that the soil meets the physical/chemical acceptance criteria as non-municipal solid waste. Once the expected waste profile is confirmed, the soil will be transported by truck and disposed of at a Subtitle D landfill that can accept less than 50 mg/kg PCB concentrations. This soil will be shipped using a non-hazardous waste manifest.

Decontamination of equipment will generate liquid waste. The liquid wastes will be stored in properly labeled drums, managed, and disposed of in a manner similar to the

excavated soil. The material will be characterized for waste disposal as required by the disposal facility.

2.2.5 EXCAVATION BACKFILL

As detailed in Section 2.2, after the confirmation sampling results have been evaluated and the results demonstrate the cleanup objectives have been met, the excavation areas will be backfilled with certified clean fill, and the area will be restored to approximate original grade. Prior to being brought to the Site, a sample of the potential backfill will be analyzed for VOCs, SVOCs, PCBs, pesticides/herbicides, TPH, and RCRA metals, and confirmed to meet the applicable DERR soil standards.

2.2.6 SITE MONITORING AND CONTROLS

A Storm Water Pollution Prevention Plan (SWPPP) will be developed before site remedial activities begin. The SWPPP will identify the use of Best Management Practices (BMPs) to reduce sediment and other pollutants in storm water associated with land disturbance activities. The anticipated area to be disturbed is less than 1-acre, and a permit for the discharge of storm water from land disturbances will not be required.

The SWPPP will contain information on sediment and erosion control measures. Periodic visual inspections will be conducted to verify that the erosion control plan is followed and performing correctly. Inspections will be completed for all storm water control measures, discharge locations, vehicle exits, disturbed areas of the construction site and material storage areas at least once every seven (7) days and within 24 hours of the end of a storm event that is 0.5 inches or greater. Prior to expected storm events, excavations will be protected from water and precipitation infiltration to the extent practical. On-site storage of excavated material will be kept to a minimum. However, any necessary stockpile areas will be placed on and covered with 6-mil (0.006-inch thick) polyethylene sheeting to prevent collection and runoff of storm water. Reports of the inspections of the storm water control measures and corrective actions, if necessary, will be maintained as part of the SWPPP.

Prior to beginning field activities and on a daily basis, a health and safety meeting will be held to review safe operating procedures with on-site personnel, including subcontractors. A health and safety meeting will be held each day prior to beginning work and following any extended breaks during the day. Following the health and safety briefing, on-site personnel will be given the opportunity to read their company's site-specific HASP and must sign the HASP indicating they understand its contents.

The health and safety officer will ensure that on-site personnel don or have available the proper personal protective equipment (PPE), such as work gloves, nitrile gloves, safety glasses, hard hats, steel-toed boots, dust masks, hearing protection, air-purifying respirators, and fall protective harnesses. The use of PPE is described in the HASP.

The top priority during the remedial action is to conduct the Site remediation, soil excavation activities, and any post-excavation confirmation sampling and analysis in a

manner that is protective of Site workers, the public, and the environment. Measures to achieve this will include:

- Establishing a work exclusion zone;
- Controlling traffic flow and security throughout the Site;
- Decontaminating equipment and, at a minimum, tires of transport vehicles;
- Conducting dust monitoring and implementing dust controls;
- Implementing the sediment and erosion control measures identified for the Site; and
- Conducting the work in accordance with a site-specific HASP.

A site layout will be prepared with the anticipated exclusion, waste staging (within the exclusion zone), and decontamination zones. The site layout will be further refined during remedial project pre-implementation discussions with the selected remedial contractor. Excavation and staging of project remediation wastes will occur within the exclusion zone. The project site and associated remedial project work areas are protected by perimeter fencing, which will be secured at the end of each workday. The fencing and associated signage will prevent unauthorized personnel or passersby from entering the work area.

The Site Health and Safety Officer (Field Oversight Manager) will monitor access to remedial action work areas and limit authorized personnel. Personnel entering and exiting the work areas must sign a logbook indicating their times of entrance and exit. Only OSHA Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) - trained personnel will be allowed within the excavation areas. Gates to the work areas will be closed and locked at the end of each workday.

Excavation will be performed in accordance with applicable OSHA regulations and the site-specific HASPs prepared by Wood and the selected excavation contractor. Excavations greater than 4 feet in depth will be barricaded upon completion of work in that area, and barricades will be placed around active work areas at the end of the workday. Barricades will conform to OSHA standards and may include wooden barricades or stakes and tape. Sediment and erosion control BMPs, as outlined in the final BMP plan, will be implemented to reduce soil erosion and runoff at the site.

Prior to leaving the site, vehicles and workers will pass through the decontamination zone. Vehicles and transportation trucks will be required to pass through a wheel washing station, at a minimum. Sampling equipment will be decontaminated in the field prior to use, between soil sampling locations and after use. The equipment decontamination method will include, for example, a non-phosphate detergent wash, tap water rinse, distilled/deionized water rinse, isopropyl alcohol air drying, and a second distilled/deionized water rinse. Decontamination will be conducted on a temporary decontamination pad. The decontamination liquids will be containerized in 55-gallon drums for proper characterization and off-site disposal.

Dust particles are anticipated to be the primary focus of monitoring during soil excavation. Dust monitoring will be conducted throughout the excavation period. Excavation activities will be appropriately directed, so that dust particles from construction activities are controlled at all times, including weekends, holidays and hours

when work is not in progress, in compliance with all federal, state and local visibility regulations. The excavation contractor will maintain excavations, permanent and temporary access roads, and other work areas within or outside the project boundaries free from airborne particulates, which would cause the federal, state, and local air pollution standards to be exceeded or cause a hazard or nuisance. Open bodied trucks transporting soil will be covered at all times when filled and in motion.

The NIOSH Recommended Exposure Limit (REL) for PCB is 1 µg/m^3 based on a 10-hour workday, forty hours per workweek. Engineering controls such as dust suppression will be implemented during excavation activities, so dust levels do not exceed 1 µg/m^3 within the excavation area. Dust meters will be placed within the excavation limits and down gradient at the property boundary to prevent dust leaving the Site. The OSHA PEL for total respirable dust is 5,000 µg/m^3. If dust levels exceed 500 µg/m^3 at the property boundary, work will stop, and dust control measures will be re-evaluated and revised, as necessary. The Occupational Safety and Health Administration (OSHA) permissible exposure limit (PEL) for Aroclor-1242 is 1,000 µg/m^3 and the OSHA PEL for Aroclor-1254 is 500 µg/m^3. No PEL has been established for Aroclor-1260. Particulate control will be performed as the work proceeds and will be evaluated based on daily air monitoring readings. Field personnel will record the monitoring data and review that the remedial contractor has sufficient, adequate equipment to accomplish these tasks.

As noted previously, a site-specific HASP for the remediation work to be performed at the Site will be prepared. The HASP assigns responsibility, establishes personnel protection standards, establishes mandatory safety operating procedures, and provides for contingencies that may arise while conducting the remedial action. The HASP includes a contingency for personal protective monitoring for additional compounds, if necessary, during the soil excavation activities. Field operations will be performed in accordance with the U.S. Environmental Protection Agency's (EPA's) "Standard Operating Safety Guides" section of the Personnel Protection and Safety Course Manual, and applicable OSHA regulations set out at 29 CFR § 1910.120.

2.2.7 REMEDIAL ACTION COMPLETION AND POST ACTION MITIGATION

A letter report will be submitted to the UDEQ within 90 days of the completion of the soil excavation. The report will provide details on soil removal and disposal, confirmation soil samples, and post excavation groundwater monitoring results, as well as details regarding Quality Assurance. Residual impacts are expected to remain in groundwater and soils upon completion of the remedial action. The risk of remaining impacts in soil from arsenic, PCBs, and TPH-DRO will be addressed through the use of long-term site management controls to be documented as part of the future Site Management and soil management Plans (SMP). These plans will be prepared and provided under separate cover.

2.3 INSTITUTIONAL CONTROLS

GE will place environmental covenants on the Site to control or eliminate the potential for risk associated with future use and intrusive activities that may expose the subsurface soil and groundwater. These environmental covenants will include:

- a restriction of the property to only non-residential use;
- a restriction on groundwater uses for monitoring purposes only; and
- a restriction on the property to include a notation in perpetuity, so that potential purchasers receive disclosure regarding the presence of any remaining impacted soil, the need to maintain the engineered barriers or caps established during the Soil RAP implementation, and/or the need to follow the DERR requirements for future handling of soil as outlined in the SMP, as appropriate (Section 2.4).

GE will work cooperatively with DERR on the environmental covenants for the Site. Prior to recording, a copy of the draft environmental covenant, based on the current DERR template, will be provided for review. Once approved by GE and DERR, GE will record the environmental covenant in the Davis County Clerk's Office, Utah.

2.4 SITE MANAGEMENT

The SMP objective is to establish engineering and administrative control measures for managing soil containing residual COCs. Following remedial action, there will be no complete soil exposure pathways remaining at the Site. The SMP will be developed and submitted separately to UDEQ, along with an environmental covenant attached to the property deed. The remedial actions conducted at the Site will control worker exposure to site related COCs. There is no anticipated change in the operational status of the Site, and therefore, no anticipated change in the potential for exposure. The SMP will be provided under separate cover.

2.4.1 CONCRETE MAINTENANCE

The surface of the west loading dock area yard consists of 6-inches of reinforced concrete over the soil exceeding the 5,000 mg/kg cleanup goal. The concrete acts as an engineered barrier or cap, preventing exposure to soils beneath the concrete.

The SMP to be implemented by the property owner will outline requirements to maintain the engineered barrier. If the barrier is removed, the engineered barriers must be reconstructed to original specifications.

Also, while property owner, GE or authorized representative will conduct an annual visit of the Site, concurrent with ongoing groundwater monitoring activities to identify subsidence depressions, areas of erosion, or other potential breaches of the engineered barriers that could expose underlying soil. Breaches in the cap shall be repaired, documented, and reported to DERR within 30 days of completion.

While property owner, GE will keep a log of annual site visits, including records regarding excavation and other construction activities that expose restricted soil. The logs will be property maintained and available for review upon request. While property owner, GE shall maintain records regarding activities related to remedial efforts, such that representatives of city, county, state, and federal regulatory agencies may review the

documents upon request. Post-closure monitoring requirements would be transferred to subsequent property owners if the property is divested.

3 PUBLIC PARTICIPATION

A published public notice will establish a 30-day public comment period in the Deseret News newspaper. The notice will be published in two consecutive print editions after DERR has approved the RAP and provides access to the RAP on the DERR website. The comment period provides the public with the opportunity to provide feedback on the plan. The DERR will address all comments received during the 30-day period before remedial work commences. The proposed public notice is included in Appendix A.

4 REFERENCES

Amec, 2017. Interim-Final Phase I Environmental Site Assessment, General Electric Facility, North Salt Lake, Utah, Amec Foster Wheeler Environment & Infrastructure, Inc., March 2017.

EPA, 2017. Low Stress (Low Flow) Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells, EPA EQASOP-GW4, Revised September 19, 2017.

EPA, 2021. Regional Screening Level Summary Table (TR=1E-06, HQ=1.0), User's Guide and supporting on-line RSL calculator at https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables last updated November 2021.

Utah Division of Environmental Response and Remediation (UDERR), 2015. *Guidelines for Utah's Corrective Action Process for Leaking Underground Storage Tanks*, Third Edition, Final Draft, October 30, 2005; updated March 2015.

UDERR, 2022. Voluntary Cleanup Program Summary, accessed at: https://deq.utah.gov/environmentalresponse-and-remediation/cercla-comprehensive-environmental-response-compensation-andliability-act/voluntary-cleanup-program. April 2022.

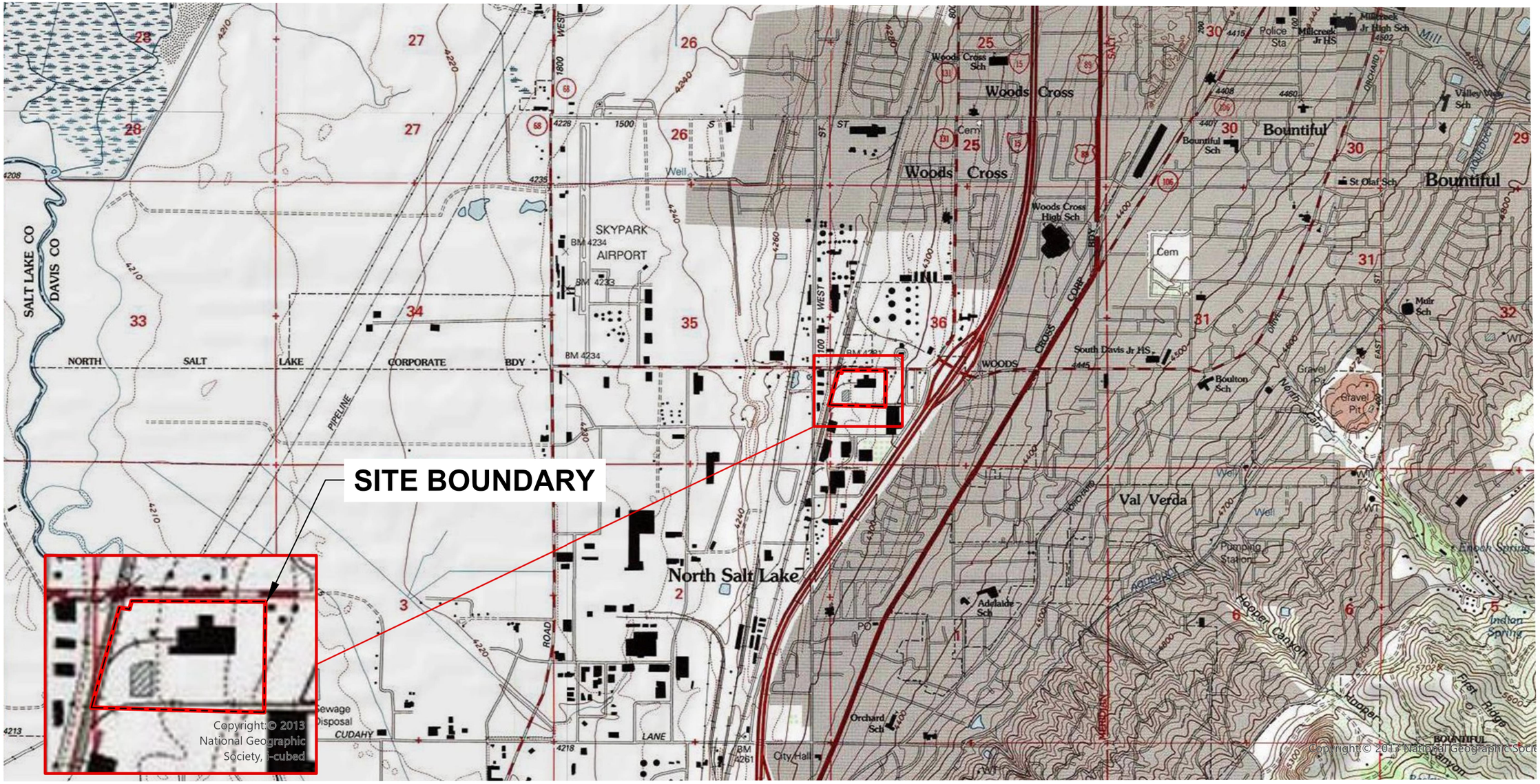
USEPA Region 8 *Draft Summary Region 8 EPA 95% UCLM Background Soil Arsenic Concentrations and Concentration Ranges (ppm)* (USEPA, 2021a) – This study identifies a range of 95% upper confidence limits (UCLs) for the State of Utah of 3 mg/kg to 20 mg/kg for urban mixed land use. Data specific to the Salt Lake area that was collected for the USEPA ranged from 3.4 mg/kg to 35 mg/kg.

Wood, 2020. Phase II Environmental Site Assessment, Former General Electric Facility, 130 East 1100 North, North Salt Lake, Utah, February 2020a.

Wood, 2021. Site Characterization Work Plan, Former General Electric Facility, 130 East 1100 North, North Salt Lake, Utah, July 2021.

Wood, 2022. Human Health And Ecological Risk Assessment, Former General Electric Facility, 130 East 1100 North, North Salt Lake, Utah, May 2022.

FIGURES



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SCALE IN FEET

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DATUM / PROJECTION: DATUM: NAD 1983 2011 PROJ: LAMBERT CONFORMAL CONIC			
DATE: 10/07/2022	CHKD BY:	WSP USA ENVIRONMENT & INFRASTRUCTURE SOLUTIONS INC 216 CENTERVIEW DRIVE, SUITE 300 BRENTWOOD, TN 37027	TITLE: SITE LOCATION FIGURE: 1
DWN BY:	PROJ NO.: WDP0014		

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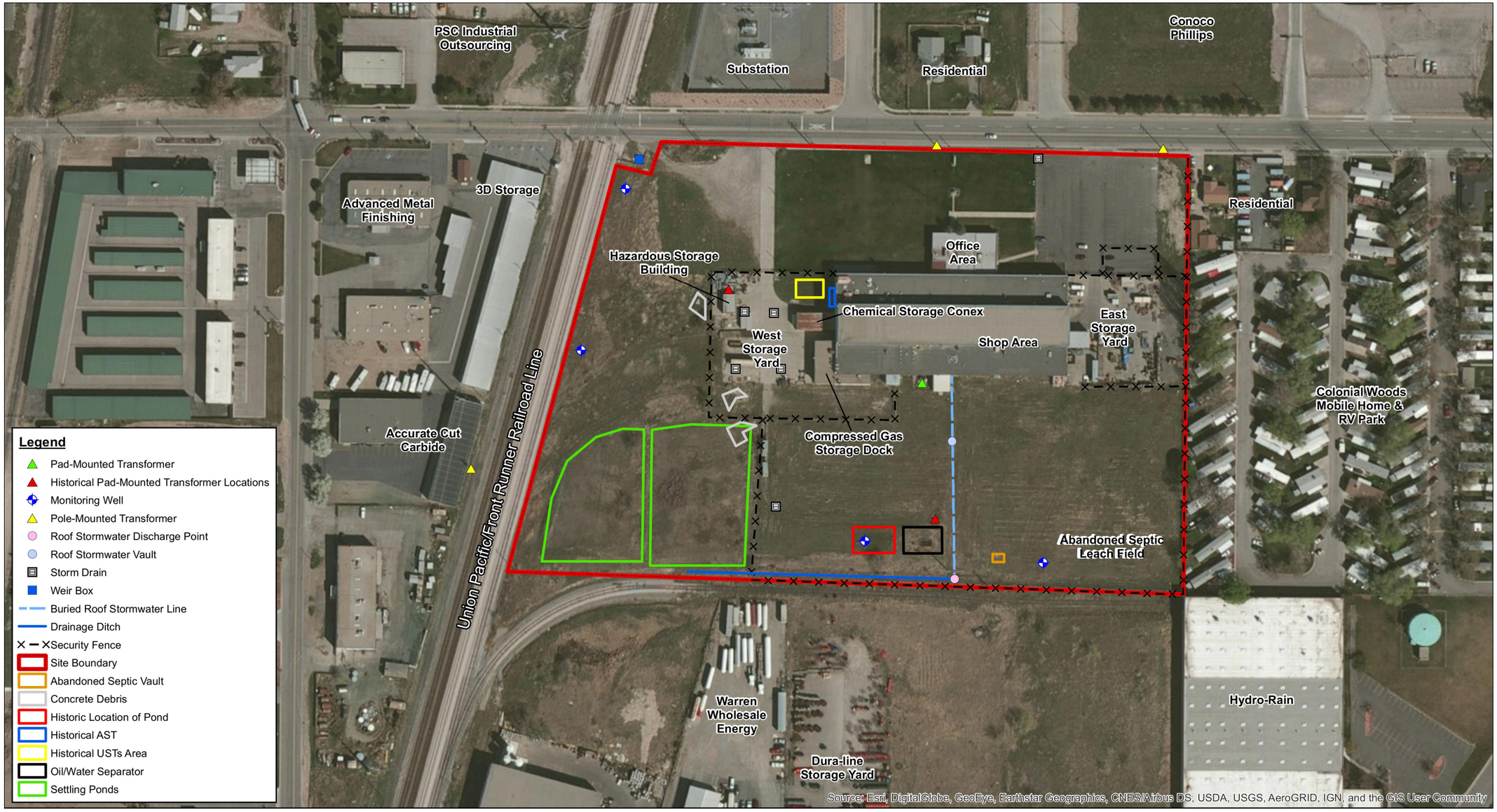

Legend

- Pad-Mounted Transformer
- Historical Pad-Mounted Transformer Locations
- Monitoring Well
- Pole-Mounted Transformer
- Roof Stormwater Discharge Point
- Roof Stormwater Vault
- Storm Drain
- Weir Box
- Buried Roof Stormwater Line
- Drainage Ditch
- Security Fence
- Site Boundary
- Abandoned Septic Vault
- Concrete Debris
- Historic Location of Pond
- Historical AST
- Historical USTs Area
- Oil/Water Separator
- Settling Ponds

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SCALE: NTS	CLIENT: GENERAL ELECTRIC, 130 EAST 1100 NORTH, NORTH SALT LAKE, UTAH 84054	PROJECT: GENERAL ELECTRIC 2022 REMEDIAL ACTION PLAN	
DATUM / PROJECTION:			
DATE: 10/07/2022 / CHKD BY:	WSP USA ENVIRONMENT & INFRASTRUCTURE SOLUTIONS INC, 216 CENTERVIEW DRIVE, SUITE 300, BRENTWOOD, TN 37027	TITLE: SITE LOCATION MAP	FIGURE: 2
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NOTES:

1. * = RESULT EXCEEDS EPA REGIONAL SCREENING LEVEL (RSL) LIMIT.
2. ND = NOT DETECTED, mg/kg = MILLIGRAMS PER KILOGRAM
3. THE 2019 SAMPLES ARE COMPARED TO THE REPORTING LIMIT (RL) AND THE 2021 SAMPLES ARE COMPARED TO THE METHOD DETECTION LIMIT (MDL).

B-1006	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1254	0 TO 2.5 FT	0.0720
		2.5 TO 5 FT	< 0.0120
		5 TO 7.5 FT	< 0.0110
		7.5 TO 10 FT	< 0.0130

B-1007	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1254	0 TO 2.5 FT	0.0650 J
		2.5 TO 5 FT	< 0.0120
		5 TO 7.5 FT	< 0.0120
		7.5 TO 10 FT	< 0.0140

AOC-2-N-WALL-3	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 2 FT	0.410

AOC-2-W-WALL-6	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 4 FT	3.90

AOC-2-BOTTOM-8	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	4 FT	0.550

AOC-2-S-WALL-4	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 2 FT	0.830

AOC-2-E-WALL-7	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 4 FT	2.30

B-1008	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1254	0 TO 2.5 FT	0.610
		2.5 TO 5 FT	< 0.0110
		5 TO 7.5 FT	< 0.0120
		7.5 TO 10 FT	< 0.0140

B-1009	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1254	0 TO 2.5 FT	0.900
		2.5 TO 5 FT	< 0.0120
		5 TO 7.5 FT	< 0.0120
		7.5 TO 10 FT	< 0.0130

B-1004	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1254/1260	0 TO 2.5 FT	< 0.0110/ < 0.0024
	PCB 1254/1260	2.5 TO 5 FT	< 0.0110/ < 0.0024
	PCB 1254/1260	5 TO 7.5 FT	< 0.0130/ < 0.0028
	PCB 1254/1260	7.5 TO 10 FT	< 0.0130/ < 0.0027

B-1005	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1254/1260	0 TO 2.5 FT	< 0.0110/ < 0.0024
	PCB 1254/1260	2.5 TO 5 FT	< 0.0120/ < 0.0024
	PCB 1254/1260	5 TO 7.5 FT	< 0.0120/ < 0.0025
	PCB 1221	7.5 TO 10 FT	0.120

AOC-1-N-WALL-5	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 5 FT	1.10

AOC-1-BOTTOM-9	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	5 FT	0.130

AOC-1-E-WALL-2	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 5 FT	< 0.210

AOC-1-S-WALL-6	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 5 FT	5.80

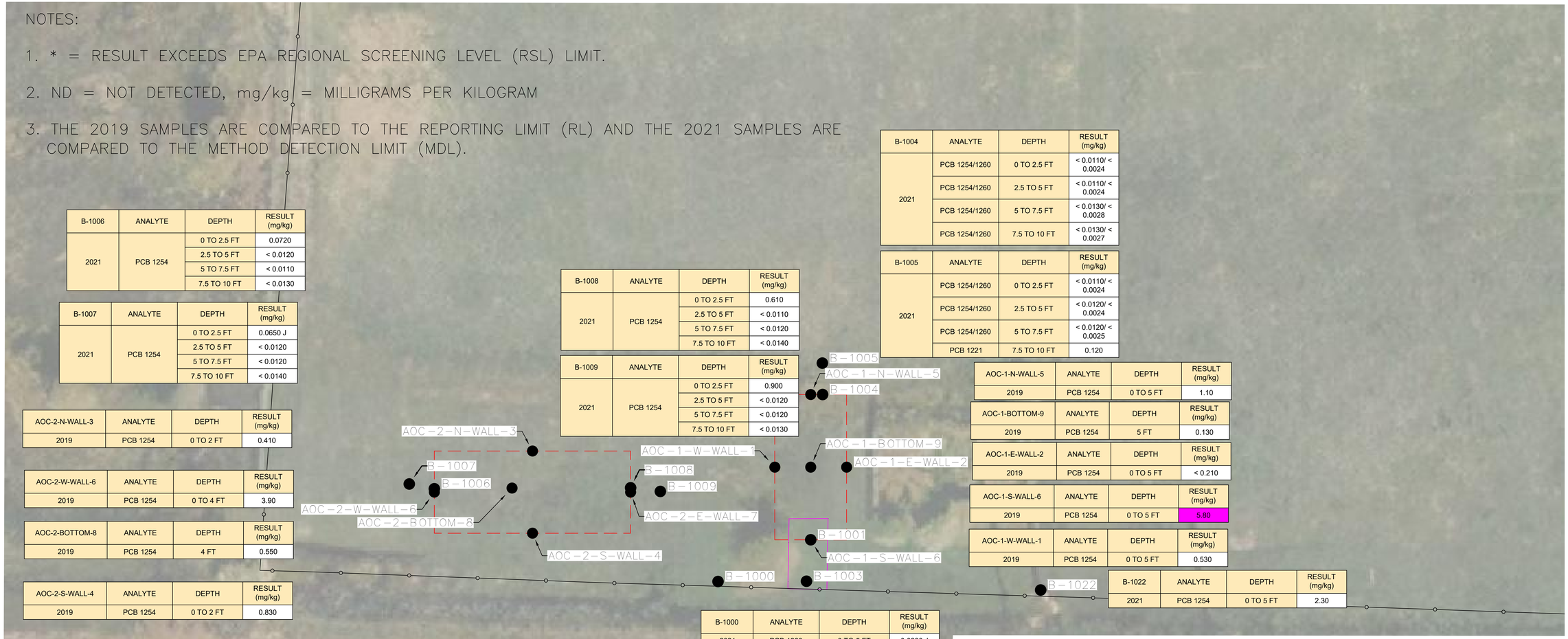
AOC-1-W-WALL-1	ANALYTE	DEPTH	RESULT (mg/kg)
2019	PCB 1254	0 TO 5 FT	0.530

B-1022	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1254	0 TO 5 FT	2.30

B-1000	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1260	0 TO 5 FT	0.0280 J

B-1001	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1260	0 TO 2.5 FT	3.00
		2.5 TO 5 FT	< 0.0026
		5 TO 7.5 FT	0.0220 J
		7.5 TO 10 FT	< 0.0027

B-1003	ANALYTE	DEPTH	RESULT (mg/kg)
2021	PCB 1260	0 TO 2.5 FT	13.0
		2.5 TO 5 FT	0.0190 J
		5 TO 7.5 FT	1.60
		7.5 TO 10 FT	0.0270 J



LEGEND

- EXISTNG EXCAVATION BOUNDARY
- EXISTING FENCE
- EXCAVATION BOUNDARY
- SOIL BORING LOCATION

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SCALE IN FEET

SCALE: NTS		CLIENT: GENERAL ELECTRIC, 130 EAST 1100 NORTH, NORTH SALT LAKE, UTAH 84054	PROJECT: GENERAL ELECTRIC 2022 REMEDIAL ACTION PLAN
DATUM / PROJECTION:			
DATE: 10/07/2022	CHKD BY:	WSP USA ENVIRONMENT & INFRASTRUCTURE SOLUTIONS INC, 216 CENTERVIEW DRIVE, SUITE 300, BRENTWOOD, TN 37027	TITLE: PCBs IN SOIL SOUTH AREA SOIL ANALYTICAL DATA MAP
DWN BY:	PROJ NO.: WDP0014		FIGURE: 3

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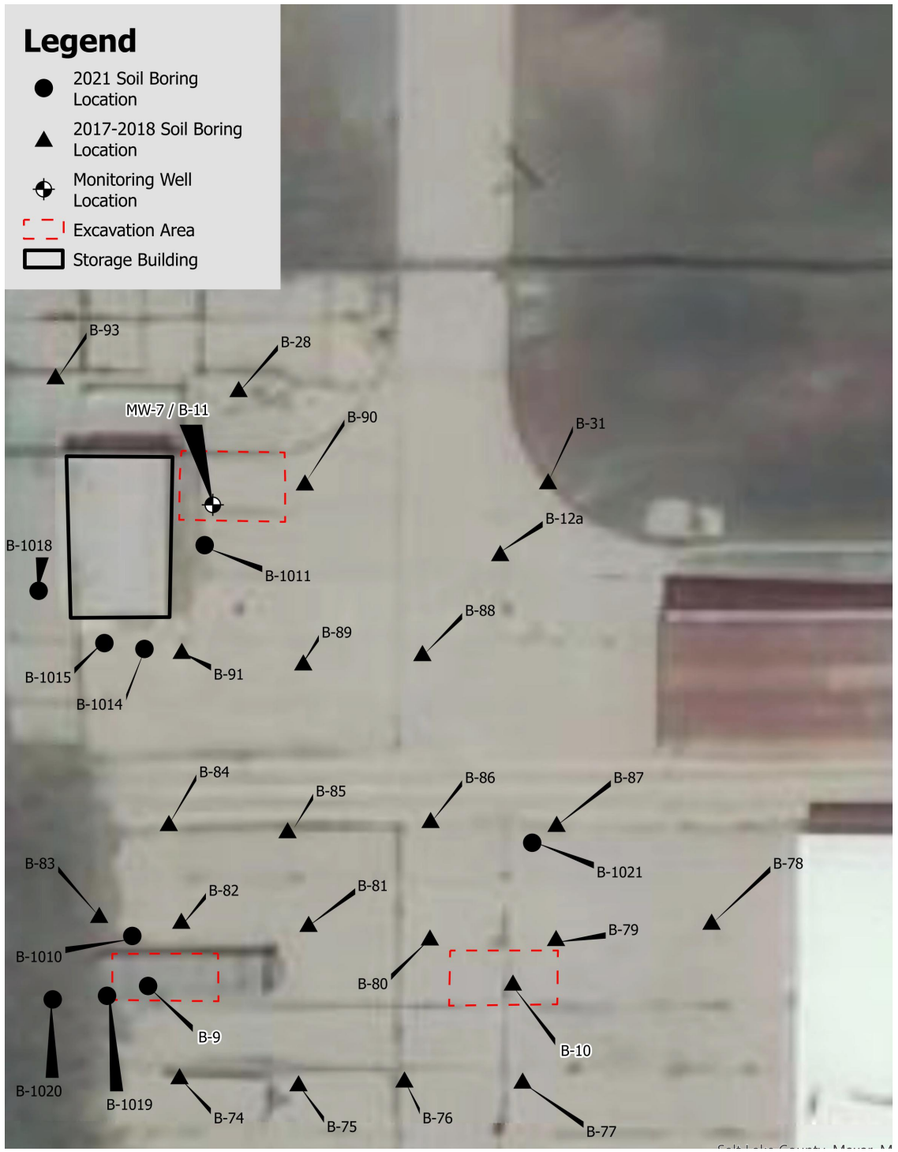
FIGURE 4



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	DATUM / PROJECTION					
	DATE 10/07/2022	CHKD BY		WSP USA ENVIRONMENT & INFRASTRUCTURE SOLUTIONS INC 216 CENTERVIEW DRIVE, SUITE 300 BRENTWOOD, TN 37027	TITLE LOADING DOCK EXCAVATION AREA	FIGURE 4
	DWN BY	PROJ NO. WDP0014				

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APPENDIX

APPENDIX

A

PROPOSED PUBLIC NOTICE

PUBLIC NOTICE
UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
VOLUNTARY CLEANUP PROGRAM

GE (Corporate Entity) is seeking public comment on a Remedial Action Plan detailing the cleanup of a portion of the former General Electric North Salt Lake Facility, also known as GE NSLC, located at 130 East 1100 North, North Salt Lake, Utah. The cleanup incorporates the removal of total petroleum hydrocarbon-diesel range organic (TPH-DRO) and polychlorinated biphenyls (PCBs) impacted soils.

A 30-day public comment period to receive comments on the Remedial Action Plan under the Utah Department of Environmental Quality's Voluntary Cleanup Program (VCP) will commence on January 30, 2023, and end at 5 p.m. on March 1, 2023.

A copy of the Remedial Action Plan, titled *Former General Electric Facility-North Salt Lake VCP Remedial Action Plan*, can be reviewed at the Division of Environmental Response and Remediation Public Notices website at: https://deq.utah.gov/environmental-response-and-remediation/public-notices-utah-division-ofenvironmental-response-and-remediation

Written comments will be accepted until 5 p.m. on March 1, 2023. Written comments should be directed to the following person and address:

Leigh Anderson, Project Manager
Division of Environmental Response and Remediation
Department of Environmental Quality
P.O. Box 144840
195 North 1950 West
Salt Lake City, UT 84114-4840
(801) 536-4100

Comments can also be submitted electronically by email to: kanderson@utah.gov.

In compliance with the Americans with Disabilities Act, individuals with special needs (including auxiliary communicative aids and services) should contact Larene Wyss, Office of Human Resources at (801) 503- 5618, Telecommunications Relay Service 711, or by email at lwyss@utah.gov.