

6/2/2020

Fwd: Former American Barrel (The Beverly) - tball@utah.gov - State of Utah Mail

From: **Rebecca Studenka** <rs@wasatch-environmental.com>
Date: Mon, Apr 13, 2020 at 1:06 PM
Subject: Former American Barrel (The Beverly)
To: Brad M. Lauchnor <blauchnor@utah.gov>
Cc: Brad Maulding <bmaulding@utah.gov>

Div of Waste Management
and Radiation Control

APR 13 2020

DSHW-2020-008049

Hello, Brad,

Please see the attached draft SMP and EC for the former American Barrel. Please let me know if it is necessary to mail a hard copy.

Thanks and have a great week!

Rebecca

**SITE MANAGEMENT PLAN
THE BEVERLY
FORMER AMERICAN BARREL
63 SOUTH 600 WEST
SALT LAKE CITY, UTAH**

Project No. 2241-002B

To:

**Mr. Ty Howard, Director
Utah Department of Environmental Quality
Division of Waste Management and Radiation Control
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Prepared for:

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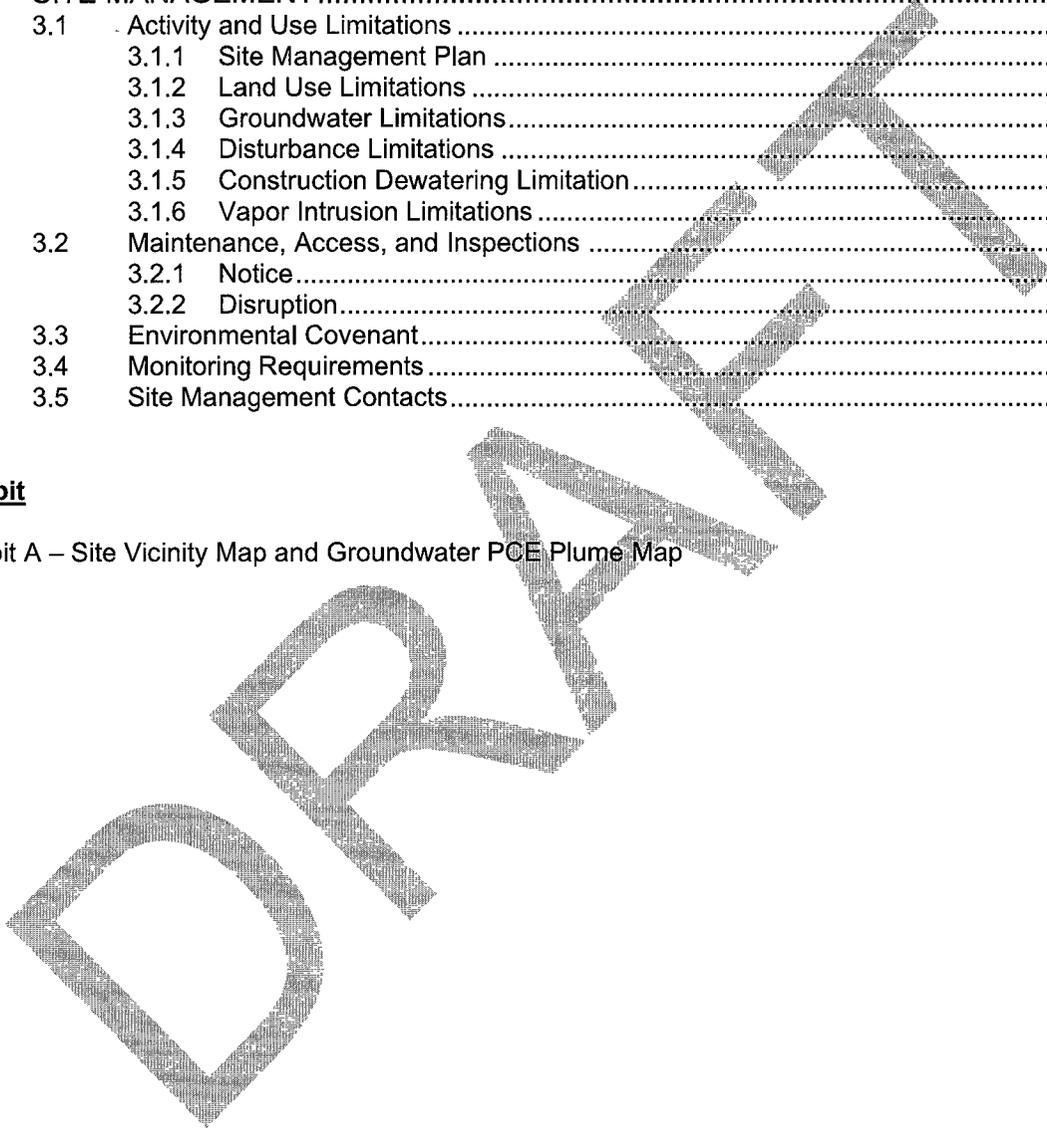
April 13, 2020

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Exhibit

Exhibit A – Site Vicinity Map and Groundwater PCE Plume Map



**SITE MANAGEMENT PLAN
THE BEVERLY
FORMER AMERICAN BARREL
SALT LAKE CITY, UTAH**

1. INTRODUCTION

Wasatch Environmental, Inc., (Wasatch) has prepared this Site Management Plan (SMP) to present the planned long-term approach for managing residual chlorinated solvent impacts to groundwater and indoor air at The Beverly (former American Barrel) facility, (herein referred to as the "The Beverly") located at 63 South 600 West in Salt Lake City, Utah.

This SMP has been prepared in accordance with the requirements of R315-101 "Cleanup Action and Risk-Based Closure Standards" that establish information requirements to support risk-based cleanup and closure standards at facilities for which remediation or removal of hazardous constituents to background levels is not expected to be achieved. The "Owner" (as defined in the Environmental Covenant [EC]) shall comply with the SMP, including provisions relating to the Activity and Use Limitations pertaining to land use limitations, groundwater limitations, construction limitations, and disturbance limitations.

1.1 Site Description

The Beverly is 0.90 acres (Tax Parcel Number: 15-01-105-007) located at 63 South 600 West in Salt Lake City, Salt Lake County, Utah (as shown in Exhibit A, Figure 1 and Figure 2). The legal description for The Beverly is:

NORTHEAST QUARTER of SECTION 1, T1S, R1W, SLB&M.

Beginning at a point on the easterly right-of-way line of 600 West Street; Said point being north 00°01'00" west, 223.08 feet and north 89°59'00" east, 71.71 feet from found street monument in the intersection of 600 West Street and 100 South Street; Said point also being north 00°04'12" east, 160.08 feet from the southwest corner of Block 81 Plat "A" of the Salt Lake City survey, and running thence north 00°04'12" west, along said easterly right-of-way, 170.08 feet; thence north 89°55'32" east, 233.19 feet; thence south 00°04'12" west, 165.07 feet; thence south 89°55'28" west, 68.00 feet; thence south 00°04'12" west, 5.00 feet; thence south 89°55'28" west, 165.19 feet to the point of beginning. Contains 39,319 square feet (or 0.90 acres).

1.2 Site Background

Under the regulatory oversight of the Utah Department of Environmental Quality, Division of Waste Management and Radiation Control (DWMRC), an environmental response project, as defined at Section 57-25-102(5) of the Utah Code Annotated, approved by the DWMRC for The Beverly, has been undertaken to address a release into the soil and shallow groundwater of chlorinated solvents and/or semi-volatile organic compounds (SVOCs) that likely originated from former occupants of The Beverly which included American Barrel (at least 1970s to 1980s) and Myers Container (1990s).

On May 29, 2018, a limited subsurface investigation was conducted on The Beverly property. The scope of work included the completion of eight soil borings to evaluate soil and groundwater conditions at The Beverly. Additionally, a groundwater sample from a previously installed piezometer was collected and three sub-slab soil gas samples from beneath the former northern building were obtained. No soil samples were submitted for laboratory analysis during the May 2018 investigation as none of the soil cores exhibited staining, odors, or elevated photoionization detector readings that would be indicative of contaminated soils.

Groundwater samples were analyzed for volatile organic compounds (VOCs), SVOCs, dissolved Resource Conservation and Recovery Act D-List metals, hexavalent chromium, pesticides, and herbicides.

Based on the results of the May 2018 investigation, tetrachloroethene (PCE) was detected in two groundwater samples collected within the former southern building at concentrations of 9.95 micrograms per liter ($\mu\text{g/L}$) and 10.6 $\mu\text{g/L}$, exceeding its United States Environmental Protection Agency (U.S. EPA) federal Maximum Contaminant Level (MCL) of 5 $\mu\text{g/L}$. Additionally, PCE was detected in sub-slab soil gas in the western portion of the former northernmost building at a concentration that exceeded the U.S. EPA Vapor Intrusion Screening Level Residential Target Sub-slab and Exterior Soil Gas Concentration.

In June 2018, the owner requested regulatory oversight of the DWMRC to conduct further investigation and potential corrective action activities under Utah Admin. Code R315-101 at The Beverly.

Under the direction and approval of the DWMRC, in September 2018, additional subsurface investigation activities were conducted at The Beverly. Numerous subsurface soil and groundwater samples were collected at The Beverly for analyses of VOCs, SVOCs, and metals. No VOCs, SVOCs, or metals were detected in the soil samples at concentrations above their respective U.S. EPA Regional Screening Levels (RSLs) for Residential or Industrial Soil, with the exception of total arsenic; however, all soil samples collected exhibited arsenic concentrations in soil within the background arsenic concentration range generally accepted by the DWMRC for the Salt Lake City, Utah area.

With the exception of PCE, no VOCs, SVOCs, or metals were detected at concentrations exceeding their respective U.S. EPA federal MCLs. PCE was detected in three groundwater samples in the southern portion of The Beverly at concentrations ranging from 7.23 $\mu\text{g/L}$ to 18.0 $\mu\text{g/L}$, exceeding its U.S. EPA federal MCL of 5 $\mu\text{g/L}$. Based on the results, it appears that a small PCE plume with concentrations exceeding its U.S. EPA federal MCL is present beneath the area of the former southern building; however, it does not appear that the plume extends beyond The Beverly boundaries.

Although all soil sampling data collected from The Beverly met unrestricted use screening levels, there was a potential for isolated areas of soil impacts to be discovered that would need to be addressed during demolition. Therefore, it was necessary to collect soil samples beneath potential source areas such as floor drains or sumps for characterization during demolition of the former buildings that had not been previously identified due to storage of materials in the buildings.

The Owner purchased The Beverly on July 30, 2019. During November 2019, the former buildings located on The Beverly were removed. During demolition and slab removal activities, and under the direction and approval of the DWMRC, numerous soil characterization samples were collected beneath features where releases to the subsurface could have potentially occurred. These areas included oil/water separators, trench floor drains, pits, underground piping, and a former waste management area. Soil samples were analyzed for VOCs and SVOCs.

Based on the analytical results from the investigation activities, two areas of SVOC-impacted soil at concentrations that exceeded U.S. EPA RSLs for Residential Soil were identified. In January 2020, two excavations were completed in the areas of SVOC impacts. Soil confirmation samples were collected from each excavation and no VOCs or SVOCs were detected in the soil samples at concentrations exceeding their respective U.S. EPA RSLs for Residential Soil.

Based on analytical results from previous subsurface investigations conducted at The Beverly, it appears that a small PCE plume with concentrations exceeding its U.S. EPA federal MCL is present beneath the southern portion of The Beverly; however, it does not appear that the plume extends beyond the Facility boundaries.

Through this SMP and an EC, including necessary activity and use limitations, the risk posed by residual chlorinated solvent contamination in groundwater at The Beverly will be mitigated. The management

requirements of the SMP and activity and use limitations of the EC will be protective of human health and the environment.

2. RISK ASSESSMENT

At the request of the Utah DWMRC personnel, a cumulative human health and ecological risk assessment was prepared for The Beverly. The results of both the human health and ecological risk assessments for both excavations result in no adverse risk. Human health carcinogenic risks were below the R315-01 target level of 1E-06 and noncarcinogenic hazard indices were below the target level of 1.0 required for clean closure. Ecological risks for each of the three key indicator species were also below the hazard index target level of 1.0 required for clean closure.

3. SITE MANAGEMENT

3.1 Activity and Use Limitations

The EC to be recorded against The Beverly imposes the following activity and use limitations:

3.1.1 Site Management Plan

The Owner shall comply with this SMP.

3.1.2 Land Use Limitations

The Beverly is suitable for residential, commercial and industrial use consistent with applicable local zoning laws; provided that residential land use and land use involving sensitive populations include the installation of a vapor barrier beneath the building(s). If future data demonstrate an acceptable level of exposure risk relative to the vapor intrusion pathway, future residential land use and land use involving sensitive populations without the installation of a vapor barrier may be permissible upon prior notification to, and approval by, the Director. Planting crops or fruit trees for consumption by humans or livestock is prohibited.

3.1.3 Groundwater Limitations

Groundwater from the shallow unconfined aquifer shall not be used for drinking water, irrigation, or bathing purposes. Other uses of groundwater from the shallow unconfined aquifer on The Beverly shall be subject to review and approval by the Director prior to implementation.

3.1.4 Disturbance Limitations

Appropriate care shall be exercised during construction, remodeling, and maintenance activities related to human-occupied structures on The Beverly so as to prevent damage to any vapor mitigation measures which have been installed, and to ensure appropriate repairs are promptly made in the event damage does occur. Appropriate care shall be exercised to protect groundwater monitoring wells on The Beverly, and to ensure appropriate repairs are promptly made, or replacement monitoring wells are promptly installed, in the event damage does occur. Repairs shall be made within a reasonable period of time from the discovery of the damage.

3.1.5 Construction Dewatering Limitation

Dewatering conducted to facilitate construction on The Beverly may require that the groundwater be treated to reduce contaminant concentrations prior to discharge. Prior to commencement of dewatering activities, appropriate permit(s) shall be obtained for discharge to either the stormwater system (under a Utah Pollutant Discharge Elimination System permit obtained from

the Utah Division of Water Quality) or to the sanitary sewer (under a Wastewater Discharge Permit obtained from the sewer district). Testing and/or treatment of the groundwater may be required by the receiving facility.

3.1.6 Vapor Intrusion Limitations

For residential enclosed structures intended for human occupancy on the ground floor, appropriate vapor intrusion mitigation measures are required to mitigate exposure risks from the vapor intrusion pathway. Appropriate vapor mitigation measures may include, but are not limited to, installation of a suitable vapor barrier, installation of a passive or active sub-slab or sub-membrane depressurization system, or construction of occupied structures utilizing positive-pressure ventilation systems. If future data demonstrate an acceptable level of exposure risk relative to the vapor intrusion pathway, future residential land use and land use involving sensitive populations on the ground floor may be permissible without vapor mitigation measures subject to prior notification to, and approval by, the Director.

3.2 Maintenance, Access, and Inspections

Under the EC, the Owner of The Beverly shall be responsible for compliance with the SMP and EC.

The Holder under the EC and the Director and their respective authorized agents, employees, and contractors shall have rights of reasonable access to The Beverly at any time after the effective date of the EC for inspections and monitoring of the compliance with the EC, and for complying with the terms and conditions of the EC and this SMP. Nothing in this SMP shall be construed as expanding or limiting any access and inspection authorities of the Holder or Director under the law.

3.2.1 Notice

Any party or person desiring to access The Beverly under authority of the EC shall provide notice to the then current Owner of The Beverly not less than 48 hours in advance of accessing The Beverly, except in the event of an emergency condition which reasonably requires immediate access. In the event of any such emergency condition, the party exercising this access right will provide notice to the then current owner of the affected portion of The Beverly requiring access as soon thereafter as is reasonably possible.

3.2.2 Disruption

To the extent that the Holder, the Director or their authorized representatives, conduct any activities on or within any portion of The Beverly, they will use reasonable efforts to comply with the then current Owner's business operation and security needs and requirements, and will conduct such activities so as to cause the least amount of disruption to the use of the affected portion of The Beverly as may be reasonably possible. Any person who conducts any activities shall repair or replace any improvements or landscaping damaged on the affected portion of The Beverly by such activities. The Director will determine what needs, requirements, and activities are reasonable. Should the Director's activities cause damage to the affected portion of The Beverly improvements or landscaping that are not repaired or replaced, the injured party may present a claim against the State of Utah in accordance with Utah law.

3.3 Environmental Covenant

An EC containing the above referenced activity and use limitations will be recorded with the Office of the County Recorder of Salt Lake County, Utah.

3.4 Monitoring Requirements

The Owner shall comply with the requirements for monitoring groundwater at The Beverly. Groundwater monitoring shall be performed on a yearly basis following completion of remediation at The Beverly. Groundwater monitoring shall be performed using monitoring wells that will be installed at The Beverly subsequent to redevelopment activities. Groundwater monitoring shall be performed using low-flow sampling techniques to facilitate the collection of geochemical parameters including temperature, pH, specific conductivity, dissolved oxygen, oxidation reduction potential, and turbidity. Groundwater samples shall be analyzed for a full list of VOCs using laboratory analytical method 8260D. Groundwater monitoring reports shall be provided to the Director within a reasonable period following the completion of each groundwater monitoring event. Groundwater monitoring shall continue until such time as the concentrations of the analyte attributable to the Release Site (PCE) in all of the monitoring wells have decreased to concentrations below the U.S. EPA MCLs, and have been demonstrated to remain below the MCLs for a period of one year (two sampling events), or after six consecutive monitoring events demonstrate that the plume is stable and not increasing. Cessation of groundwater monitoring is subject to review and approval by the Director.

3.5 Site Management Contacts

Inquiries concerning the SMP should be directed to the following:

Tony Hill

C.W. Land

1222 West Legacy Crossing Boulevard, Suite 6
Centerville, Utah 84014
(801) 628-8202

**Utah Department of Environmental Quality
Division of Waste Management and Radiation Control**

Director
P.O. Box 144880
Salt Lake City, Utah 84114-4880
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DRAFT

Exhibit A

Site Vicinity Map and Groundwater PCE Plume Map



Scale: 1" equals
approximately 400 feet



Environmental Science and Engineering

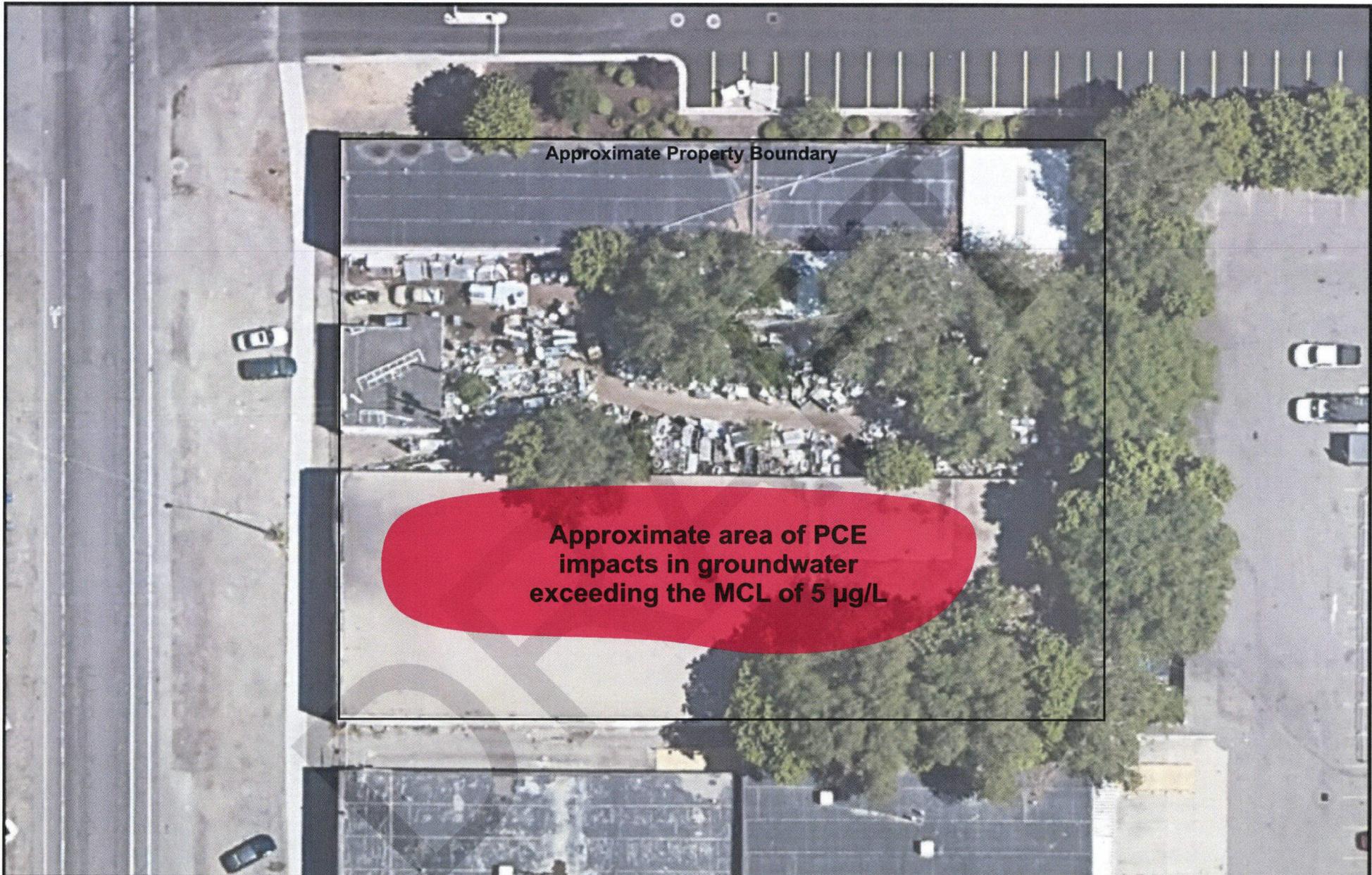
Site Vicinity Map

Former American Barrel Property
45-53 South 600 West
Salt Lake City, Utah

PROJECT NO.: 2241-002B

DATE: 2/20/2020

FIGURE 1



Scale: 1" equals approximately 40 feet



Environmental Science and Engineering

Groundwater PCE Plume Map

Former American Barrel Property
45-53 South 600 West
Salt Lake City, Utah

PROJECT NO.: 2241-002B

DATE: 2/20/2020

FIGURE 2