



Div of Waste Management
and Radiation Control

UTD009073354 JUN 12 2019
Georgia-Pacific LLC

133 Peachtree Street NE (30303-1847)
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DSHW-2019-005907

June 6, 2019

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

**Subject: Site Management Plan, Environmental Covenant, and Well Abandonment Plan
(June 6, 2019 revision)**
Georgia-Pacific Former Gypsum Manufacturing Facility
200 South State Street (Utah Highway 24)
Sigurd, UT

Dear Mr. Gabert:

Please find enclosed the subject documents for your review and approval. These documents were prepared in response to the Division of Waste Management and Radiation Control letter dated May 16, 2018 and revised on June 6, 2019 in response to your comments. It is our understanding that the Environmental Covenant is still under review by the Division's counsel. Please let us know if there are further required modifications, or if the proposed work may proceed.

If you have any questions regarding the enclosed documents, please feel free to call me at (404) 652-6874 to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Hassett'.

Michael Hassett
Senior Manager, Remediation

Attachments: *Site Management Plan, revised 6/6/19*
Environmental Covenant, revised 6/6/19 and pending Division counsel review
Well Abandonment Plan, revised 6/6/19

CC: Mike Egan, Tetra Tech
Greg Council, Tetra Tech

SITE MANAGEMENT PLAN

SITE MANAGEMENT PLAN
Georgia-Pacific Gypsum Board Manufacturing Facility
Sigurd, Utah
June 6, 2019

1. This Site Management Plan (“SMP”) pertains to the former Georgia-Pacific (GP) (d.b.a. GP Industrial Plasters LLC) gypsum board manufacturing facility property which is referenced herein as the “Subject Area”. The Subject Area is located at approximately Township 23 South Range 2 West, Section 1 in the northeast and southeast quarter sections and at 200 South State Street (Utah Highway 24), Sigurd, Utah 84657. The Subject Area is comprised of approximately 21.75 acres of real property. The Subject Area is depicted in **Exhibit A** and described in **Exhibit B** to this SMP. The Subject Area includes a groundwater plume located approximately 15 to 25 feet below ground surface impacted by low concentrations of petroleum hydrocarbons within the shallow unconfined groundwater aquifer. The groundwater petroleum hydrocarbon plume does not affect any other part of the property or adjoining properties, the plume is not expanding, and there are no significant risks to human health or the environment from this plume. The Subject Area is subject to certain *Cleanup Action and Risk-Based Closure Standards*, pursuant to Utah Administrative Code R315-101, as documented in the human health risk assessment prepared as part of the October 31, 2016 Groundwater Quality Evaluation report, as approved by the Director (“Director”) of the Division of Waste Management and Radiation Control (“Division”) to the Subject Area Owner. The Director maintains the administrative record relating to the Risk-Based Closure (record located at 195 North 1950 West, Salt Lake City, Utah).

2. Soils and groundwater on and within the Subject Area have undergone investigation, characterization and delineation to determine whether they are impacted by chemical compounds, metals or other constituents. In addition, source removal of impacted soil has occurred. A Human Health Risk Evaluation (“HHRE”) was completed using laboratory analytical data from samples taken from media on and within the Subject Area (Tetra Tech 2016 and Tetra Tech 2017). A subsequent groundwater monitoring report (Tetra Tech 2018) documenting a 2017 monitoring event was prepared and presented a path forward for cessation of groundwater monitoring at the site, based on the HHRE and the monitoring event findings. The HHRE and subsequent groundwater monitoring report conclusions were agreed to by the Director in a letter, dated May 16, 2018. The 2018 letter presented conditions for the cessation of groundwater monitoring at the Subject Area. The conditions included:

- a. Prepare a SMP outlining items contained in the May 16, 2018 letter from the Director.
- b. Conduct one additional monitoring event in October 2021 of monitoring well MW-7 for volatile organic compounds, the results of which should demonstrate that naphthalene concentrations do not increase above the 2017 concentrations;
- c. Put in place an appropriate land use restriction (Environmental Covenant) prohibiting the use of Subject Area groundwater as a drinking water source; and
- d. Prepare a groundwater monitoring well abandonment plan for all onsite wells except MW-7 and following Utah Division of Waste Management and Radiation Control approval, abandon the wells.

3. The HHRE is based on assumed exposure to the inhalation of volatile groundwater contaminants by Subject Area workers and a combination of the inhalation pathway and oral ingestion of groundwater by an adolescent trespasser. A target cancer risk value of 10^{-5} and a cumulative hazard index of 1.0 was used as a basis for receptor risk. The assumed land use for the Subject Area is industrial and other comparable land uses with similar levels of human occupancy. Based on the assumed land uses for the Subject Area, the HHRE concluded that:

- a. Inhalation of volatile groundwater contaminants does not pose a risk to future construction workers.
- b. Inhalation of volatile groundwater contaminants does not pose a risk to outdoor commercial/industrial workers.
- c. Inhalation of volatile groundwater contaminants does not pose a risk to current and future Subject Area monitoring workers.
- d. Consumption of groundwater and inhalation of volatile groundwater contaminants does not pose a risk to an adolescent trespasser.

4. This SMP includes activity and use limitations and other controls to ensure that residual low levels of chemical constituents remaining in groundwater within the Subject Area are adequate for protection of human health and the environment. Activity and use limitations and other controls will be implemented for the Subject Area pursuant to this SMP and the *Subject Area Environmental Covenant* that will be recorded at the Sevier County Recorder's office for the Subject Area ("*Environmental Covenant*").

5. The HHRE and SMP satisfy the requirements of Utah Admin. Code R315-101-6 and, together with the Environmental Covenant, support a determination by the Director that corrective action is complete with controls within the Subject Area.

6. Subject Area Management. The management requirements below, in **Sections 7 and 8**, pertain to and shall be implemented within the Subject Area pursuant to Utah Admin. Code R315-101-6 and Utah Code Ann. § 19-6-108.3.

7. Land Use. The Subject Area may be used for industrial and incidental construction worker activities and any other comparable use with a similar level of human occupancy or use ("*Allowed Uses*") subject to the groundwater use limitation specified in **Section 8** for industrial uses. Should Subject Area Owner or subsequent users of the Subject Area plan to develop any use without the management and engineering controls specified in **Section 8**, the Subject Area Owner of the Subject Area, or any part thereof, and any users shall, prior to developing the use, demonstrate to the Director's satisfaction that the risk levels of the proposed use will not exceed the applicable risk exposure level.

8. Groundwater Use. Groundwater under the Subject Area and within the shallow unconfined aquifer, as defined in the *Groundwater Quality Evaluation Report* (Tetra Tech 2016), shall not be used as a drinking water source. Groundwater shall not be pumped and discharged or disposed of unless permitted or conducted under existing State and Federal regulations.

9. Access. Under the Environmental Covenant, the Director, the owner, and any holder, and their respective authorized agents, employees and contractors have rights of reasonable access to the Subject Area at any time after the effective date of the Environmental Covenant for monitoring of compliance with the Environmental Covenant and for complying with the terms and conditions of this SMP. All holders of and those subject to the Environmental Covenant are required to allow compliance with the SMP. Nothing in this SMP shall be construed as expanding or limiting any access and inspection authorities of the Division and the Director under Utah law.

a. Notice. Except as provided in this subsection, any party or person desiring to access the Subject Area under authority of the Environmental Covenant shall provide notice to the then current Subject Area Owner of the affected portion of the Subject Area not less than 48 hours in advance of accessing the affected portion of the Subject Area, 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 Subject Area Owner of the affected portion of the Subject Area requiring access as soon thereafter as is reasonably possible. The Division, the Director, and their authorized officers, employees, or representatives may, at any reasonable time and upon presentation of appropriate credentials, have access to the Subject Area.

b. Disruption. To the extent that the Director, any holder, or their authorized representatives, conduct any activities on or within any portion of the Subject Area, they will use reasonable efforts to comply with the then current affected Subject Area Owner's or tenant's 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 Subject Area as may be reasonably possible. Any person who conducts any activities shall repair and replace any improvements or landscaping damaged on the affected portion of the Subject Area by such activities. The Director and his authorized representatives will use reasonable efforts to comply with the then current Subject Area Owner's security needs and requirements and will attempt to minimize disruption of the use of the affected portion of the Subject Area. The Director will determine what needs, requirements, and activities are reasonable. Should the Director's activities cause damage to the affected portion of the Subject Area improvements or landscaping, the injured party may present a claim against the State of Utah in accordance with Utah law.

10. Reports. Upon request, the Subject Area Owner shall submit to the Director a report confirming that the terms and conditions of this SMP and the Environmental Covenant are being substantially satisfied.

11. Subject Area Management Contacts. Inquiries concerning the SMP should be directed to the following:

Subject Area Owner

GP Industrial Plasters LLC
133 Peachtree Street NE (30303-1847)
P.O. Box 105605
Atlanta, Georgia 30348-5605
(404) 652-6874
Attn: L. Chase Fortenberry

Director

Utah Division of Waste Management
and Radiation Control
195 North 1950 West
Salt Lake City, UT 84116
801-536-4400

The Director shall be notified promptly in writing of any change in the contact information for Subject Area Owner. The Director shall promptly notify Subject Area Owner of any change in the Director contact information.

12. References.

- Tetra Tech, 2016. Groundwater Quality Evaluation, Georgia-Pacific Former Gypsum Manufacturing Facility. Technical report submitted to Helge Gabert, Utah DEQ. October 31.
- Tetra Tech, 2017. Groundwater Quality Evaluation Update and Source-Area Investigation/Excavation Completion Report, Georgia-Pacific Former Gypsum Manufacturing Facility, Sigurd, Utah. Version 2. July 31.
- Tetra Tech, 2018. 2017 Groundwater Monitoring Report, Georgia-Pacific Former Gypsum Manufacturing Facility, Sigurd, Utah. Version 4. April 13.
- UDEQ, 2018. Utah Administrative Code Rule R315-101. Cleanup Action and Risk-Based Closure Standards.
<https://rules.utah.gov/publicat/code/r315/r315-101.htm>. September 1.

EXHIBIT A

Map of the Subject Area, Georgia Pacific Gypsum Board Manufacturing Facility, Sigurd, Utah

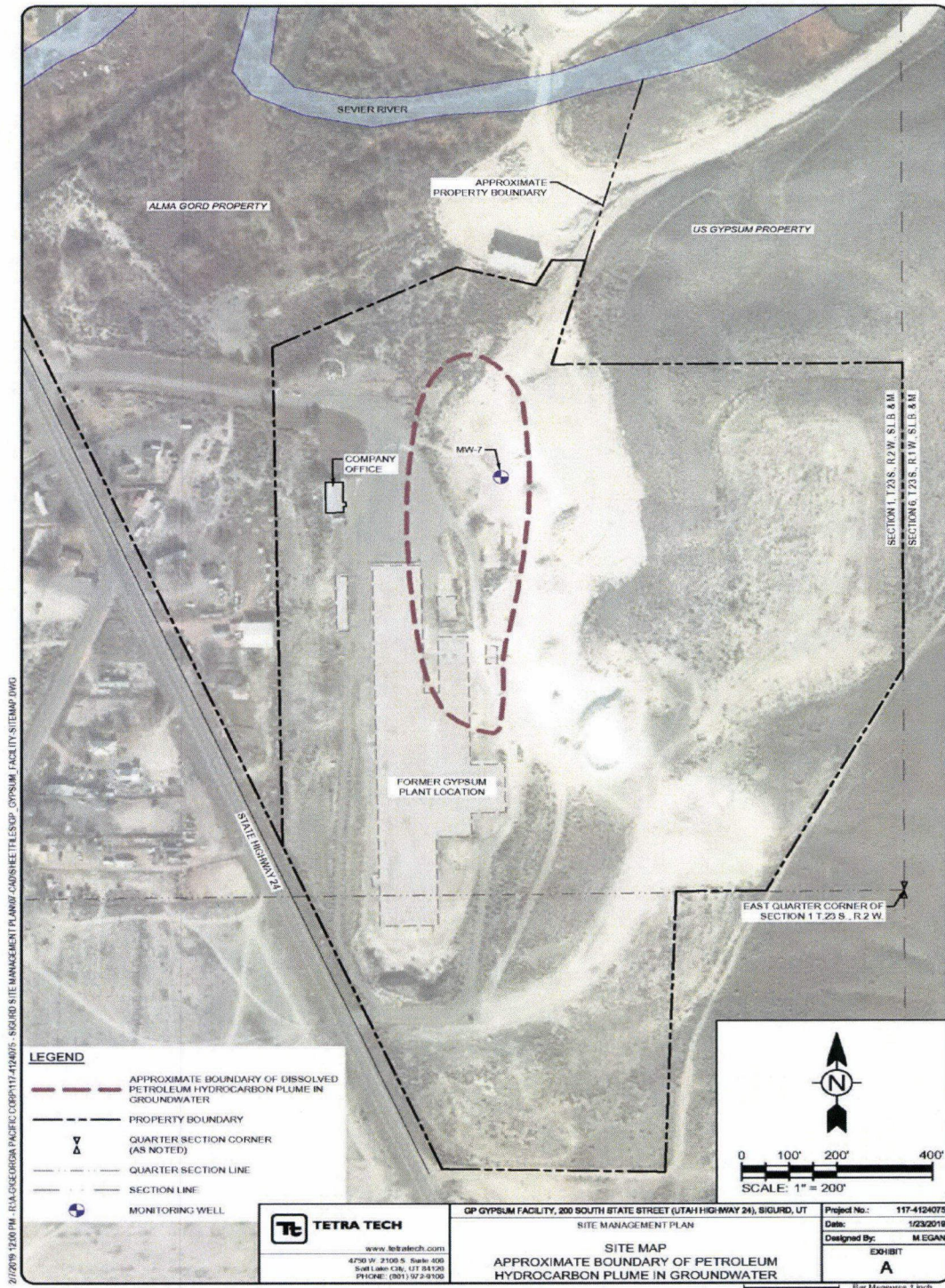


EXHIBIT B

BOUNDARY DESCRIPTION SUBJECT AREA

THE REAL PROPERTY LOCATED IN SEVIER COUNTY, UTAH MORE PARTICULARLY DESCRIBED AS FOLLOWS:

Parcel 4-186-15

15.95 Acres

Quarter: NE S 1 T 23S R 2W BEGINNING AT A POINT LOCATED ON THE WEST BOUNDARY OF AN EXISTING DIRT ROAD, WHICH POINT IS WEST 289.90 FEET FROM THE EAST QUARTER CORNER OF SECTION 1, TOWNSHIP 23 SOUTH, RANGE 2 WEST, SALT LAKE BASE & MERIDIAN, RUNNING THENCE WEST 297.50 FEET TO A POINT 11.10 CHAINS EAST OF THE SOUTHWEST CORNER OF THE SOUTHEAST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 1; THENCE NORTH 1320 FEET TO THE NORTHWEST CORNER OF SAID SOUTHEAST QUARTER OF THE NORTHEAST QUARTER OF SECTION 1; THENCE EAST 587.40 FEET, TO THE SECTION LINE; THENCE SOUTH 765.30 FEET TO THE WEST BOUNDARY OF THE AFORE DESCRIBED DIRT ROAD; THENCE S 27°35'34" WEST ALONG SAID ROAD 625.89 FEET TO THE POINT OF BEGINNING, CONTAINING 15.95 ACRES, MORE OR LESS.

Parcel Number 4-186-13

5.80 Acres

BEGINNING AT A POIN NORTH 24 DEGREES WEST 2,262 FROM THE SOUTHWEST CORNER OF SECTION 6, TOWNSHIP 23 SOUTH, RANGE 1 WEST, SALT LAKE BASE AND MERIDIAN AND RUNNING THENCE NORTH 20 DEGREES WEST 465 FEET; THEN SOUTH 87 DEGREES 45 MINUTES EAST 661 FEET TO THE PLACE OF BEGINNING.

WELL ABANDONMENT PLAN

WELL ABANDONMENT PLAN
Georgia-Pacific Gypsum Board Manufacturing Facility
Sigurd, Utah
June 6, 2019

This Well Abandonment Plan summarizes the proposed well abandonment activities at the Georgia-Pacific (GP) facility located in Sigurd, Utah. The Well Abandonment Plan is being submitted for Utah Division of Waste Management and Radiation Control (UDWMRC) review and approval in response to the division's letter to Georgia-Pacific, dated, May 16, 2018. That letter stated, "all site monitoring wells, except for MW-7, should be properly abandoned in accordance with Utah Administrative Code (UAC) R655-4-14".

SCOPE OF WORK

The proposed well abandonment will be performed by a Tetra Tech field scientist and involve the following activities in compliance with UAC R655-4-14:

- a. Visually locate the 13 groundwater monitor wells previously installed by Tetra Tech that are most recently known to exist (see Exhibit A). Those monitoring wells are all less than 30 feet deep. Well MW-7 will be located and preserved for later sampling.
- b. Open well casings, sound wells to check for obstructions and depth to groundwater (if present) and determine the condition of the well casings and their ability to accept sealing materials.
- c. Fill polyvinyl chloride (PVC) well casings with bentonite chips to approximately 6 inches below ground surface and cut PVC off at this depth. While placing bentonite use a tamping rod to break up bridges and to verify a continuous seal. Where groundwater is present in the casing, a neat cement grout will be introduced via tremie pipe from the bottom of the well upward until at a minimum to the top of the groundwater table.
- d. For flush mount surface completions place concrete in void space within protective cover overlying PVC well casing to ground surface.
- e. For above grade steel protective casing surface completions, cut off steel protective casing at ground surface or pull out steel protective casing to expose PVC casing. Fill void with concrete to ground surface.
- f. Following the well abandonment activities, a letter report documenting the well abandonment activities will be prepared and submitted to GP and the State of Utah.

EXHIBIT A

**Map of the Subject Area Presenting Monitoring Well Locations,
Georgia Pacific Gypsum Board Manufacturing Facility, Sigurd, Utah**

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