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DSHW-2019-012541



October 2, 2019

Div. of Waste Management
and Radiation Control

OCT - 7 2019

Dave Larsen
Division of Waste Management and Radiation Control
Utah Department of Environmental Quality
P.O. Box 144880
Salt Lake City, UT 84114-4880

RE: Submittal of Site Management Plan, WBH Enterprises Property

Dear Dave:

On behalf of WBH Enterprises, this letter submits one hard copy of the *Site Management Plan, WBH Enterprises Property, October 2, 2019* for public comment.

Please contact me at 801-333-8427 if you have any questions.

Best Regards,

BARR ENGINEERING CO.

A handwritten signature in cursive script that reads "Laurie L. Goldner".

Laurie L. Goldner, Ph.D.
Senior Environmental Consultant

Enclosure

c: Lynn Hurst (w/o enclosure)

The BARR logo consists of the word "BARR" in a bold, sans-serif font, with a horizontal line underneath the letters.

Environmental Investigation
and Remediation Control

001 - 7 2019

Site Management Plan

***WBH Enterprises Property
243 W. 3300 South
South Salt Lake, Utah 84115***

Prepared for:

WBH Enterprises, LLC
243 W. 3300 South
South Salt Lake, Utah 84115

October 2, 2019

WBH Enterprises Property

Site Management Plan

October 2, 2019

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1.0 Introduction

This Site Management Plan (SMP) has been prepared by Barr Engineering Co. (Barr) on behalf of WBH Enterprises, LLC ("Owner") and describes requirements for the long-term management of contaminated soil and ground water at the WBH Enterprises property located at 243 West 3300 South, South Salt Lake, Utah (the Property; see Figure 1).

This SMP has been prepared in accordance with the requirements of R315-101 "Cleanup Action and Risk-Based Closure Standards". The R315-101 standard describes the information required to support risk-based cleanup and closure standards for facilities where remediation of hazardous constituents to residential screening levels or background concentrations will not be achieved.

1.1 Site Description

The Property is approximately 2.98 acres and consists of Salt Lake County Parcel 15-25-454-033 and is currently occupied by Wasatch Steel, a steel sales and service center (see Figure 1). The legal description of the parcel obtained from the Salt Lake County Assessor's website is:

LOT 2, WALTON PARK SUB.

Topography of the Property is generally flat with a drainage slope towards the north and west. Shallow groundwater flow direction at the Property is considered to be west to northwest based on review of subsurface investigation files on the Property and in the vicinity. Shallow groundwater is present at less than 10 feet below the ground surface (Barr 2019a).

Wasatch Steel is a wholesale/retail supplier of steel products. The Property is zoned CC for corridor commercial use. Five structures including an office/warehouse and four storage and/or steel cutting sheds are located on the Property. Materials are purchased from vendors and warehoused (indoors and outdoors) on site prior to re-sale. No metal manufacturing or treatment occurs on the Property, although materials may be cut or drilled prior to sale if requested by the customer.

The Property is primarily accessed from a driveway from 3300 South Street at the north end of the Property. Drinking water and sanitary services are provided by the City of South Salt Lake. Historically the Property has been used for agricultural and industrial activities. Historical buildings previously located on the western Property boundary have been demolished.

The current use of adjoining properties includes industrial and commercial businesses, including Wasatch Metal Recycling, a metal salvage yard to the east. The past use of adjoining properties has developed from agricultural to the current industrial and commercial uses.

1.2 Site Background

1.2.1 Phase I ESA

Barr conducted a Phase I Environmental Site Assessment (ESA) for Waterfront Capital, a potential purchaser of the Property, in April 2019 (Barr 2019a). Several recognized environmental conditions (RECs) were identified:

- potential petroleum and lead contamination from a release from on-site former leaking underground storage tanks that had been closed by the regulatory agency in 1994;
- an in-ground concrete sump-like structure that may have been used for disposal of petroleum products or other hazardous substances, and;
- an approximately 130-foot long soil berm located adjacent to the eastern property boundary that may have impacted the Property. The berm is composed of soil scraped from the surface of the Wasatch Metal Recycling site, which adjoins the Property to the east. Based on its historic and current use for metal salvage, metals and fluids from salvaged automobiles and equipment may be present in this soil.

Barr recommended further investigation to assess whether contamination existed at the Property.

1.2.2 Limited Phase II ESA

Based on the Phase I ESA recommendations, Waterfront Capital contracted with Barr to conduct a limited Phase II investigation in April/May 2019 to determine if the soil and groundwater on the Property had been impacted (Barr 2019b). Environmental conditions identified by the Phase II investigation are discussed below.

Concentrations of arsenic and lead in all three groundwater samples, and barium, cadmium, chromium, and mercury in one sample exceeded EPA Maximum Contaminant Levels (MCLs), suggesting possible impacts due to metal recycling activities that have occurred on the eastern adjacent site or possibly on the Property. There was no evidence of petroleum contamination related to the former underground storage tanks (USTs).

Concentrations of arsenic in soil samples collected from one boring and from surface soil adjacent to the berm on the eastern central portion of the Property exceeded the EPA Regional Screening Level (RSL) for Industrial Soil (3.0 mg/kg; USEPA 2019). Although soils in the Salt Lake valley generally contain arsenic at concentrations in excess of this RSL, the two composite samples collected adjacent to the berm appeared to be elevated relative to regional background concentrations. Large quantities of slag were noted on the surface of the Property, possibly brought in as fill; this material was not sampled as part of the Phase II investigation.

Total petroleum hydrocarbons-diesel range organics (TPH-DRO) were detected in a soil sample from a boring in the eastern central portion the Property. No other volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs) were detected in this sample. This may be associated with impacts from leaking vehicle fluids due to the former scraped vehicle storage lot that extended across the width of the Property circa 1962.

1.2.3 Phase III Site Investigation and Remediation

The Property owner, WBH Enterprises, LLC, retained Barr to conduct a Phase III investigation with oversight by the Utah Department of Environmental Quality, Division of Waste Management and Radiation Control (WMRC) to define the nature and extent of contamination. Details of the investigation and subsequent remediation are presented in the Phase III Investigation and Soil Remediation Report (Barr, 2019 c).

The Phase III investigation resulted in the identification of metals contamination exceeding the residential values of R315-101 in surface soil in several areas of the site. The investigation also identified contamination in surface soil exceeding the industrial values of R315-101 in one hotspot area. The primary contaminant of concern in the hotspot area was lead.

Because the lead contamination exceeded the industrial Preliminary Remediation Goal (PRG) of 1,050 mg/kg (Table 3, USEPA, 2017), approximately 210 tons of impacted soil from this hotspot area was subsequently excavated and disposed of at the Salt Lake Valley landfill, and the excavation was backfilled with clean fill.

Contamination in surface soil in the vicinity of the hotspot area also exceeded the EPA Protection of Groundwater Soil Screening levels (SSLs) with a dilution-attenuation factor of 20 (DAF-20; USEPA, 2019) for cadmium, chromium, lead and mercury, but this soil was removed as part of the remediation. Based on this, and since metals are generally immobile in soil and a source of groundwater contamination is not present in soil, corrective action for groundwater protection was not needed.

Surface and subsurface soil and groundwater exceeds screening levels for arsenic, but the concentrations appear to be generally consistent with naturally elevated background concentrations in the Salt Lake Valley (UDEH, 1991).

No VOCs were detected above screening levels in soil, and no SVOCs were detected. Concentrations of vinyl chloride and naphthalene exceeding screening levels were detected in groundwater, but appear to be due to an upgradient, off-site source. Based on the groundwater data and groundwater protection evaluation using DAF-20 values, groundwater monitoring is not required.

2.0 Proposed Site Management

This SMP is designed to minimize potential risks to human health and the environment through a combination of site management and an environmental covenant (EC). The use of the Property is anticipated to remain as a wholesale/retail supplier of steel products. Site workers and construction workers would be the most likely exposed individuals; potential exposures to customers visiting the Property are not expected to be significant.

Unless land use changes as described in Section 2.1, below, the SMP is applicable to all owners of the property.

2.1 Land Use Limitations

Due to contamination of surface soil by lead and other metals at concentrations above the residential use standards of R315-101, use of the Property is limited to commercial and industrial land use consistent with applicable local zoning laws. Residential land use, land uses with human exposure scenarios similar to residential land use (e.g., homeless shelters and long-term care facilities), and land uses that may expose children or the infirm to contaminants (e.g., schools, day care facilities, managed care facilities, and hospitals) are prohibited. Planting crops or fruit trees for consumption by humans or livestock is prohibited.

If a change in land use from commercial/industrial to residential (or similar, as described above) is contemplated, the Owner must provide advance written notification to WMRC. Additional investigation, human health risk assessment, possible corrective action, and the subsequent amendment or modification of this SMP and the Environmental Covenant may be required to allow for a change in land use of the Property. Land use changes must be approved by the Director of WMRC.

2.2 Groundwater Use Limitations

Due to contamination of the shallow groundwater at the property by low concentrations of volatile organic compounds, the Owner shall not use or allow anyone else to use on-site groundwater for any purpose, including culinary or industrial use, irrigation, or for the use of animals. As required by applicable city building codes, groundwater at the site is not and shall not be used for drinking water. However, groundwater generated from construction dewatering or similar activities may be treated and/or disposed according to local, state, and federal regulations.

2.3 Disturbance Limitations

2.3.1 Pavement Maintenance

Although lead contaminated surface soil has been remediated, additional contaminated soil may remain underneath the pavement of the north-south driveway immediately west of the excavated area. The Owner shall maintain the pavement on north-south driveway in the area shown on Figure 2 in good condition.

2.3.2 Soil Removed from the Property

The Owner shall sample and analyze for total metals and TCLP metals any soil to be removed from the Property. There are no restrictions for the off-site disposal of soil if TCLP results show the soil is not hazardous and total metals concentrations are below both the current EPA RSLs for Residential Soil and the EPA Protection of Ground Water SSLs calculated with DAF-20, and for arsenic, below background concentrations (20.34 mg/kg; UDEH 1991). If metals concentrations exceed TCLP limits the waste must be managed as hazardous waste. Contaminated soil that exceeds the screening/background levels, but does not exceed TCLP values shall be disposed of at a permitted Subtitle D solid waste landfill.

3.0 Environmental Covenant

The Owner will reduce potential risks for site workers and construction workers through an Environmental Covenant (EC) that complies with Utah Code 57-25 Sections 101-114. This EC will include the activity and use limitations described above which have been designed to reduce or eliminate exposure to contaminated soil and groundwater.

4.0 Site Management Contacts

The contact for WBH Enterprises, LLC for any questions or comments regarding this plan is:

Manager
WBH Enterprises, LLC
243 W. 3300 South
South Salt Lake, Utah 84115
801-486-4463

The contact for WMRC for any questions or comments regarding this plan is:

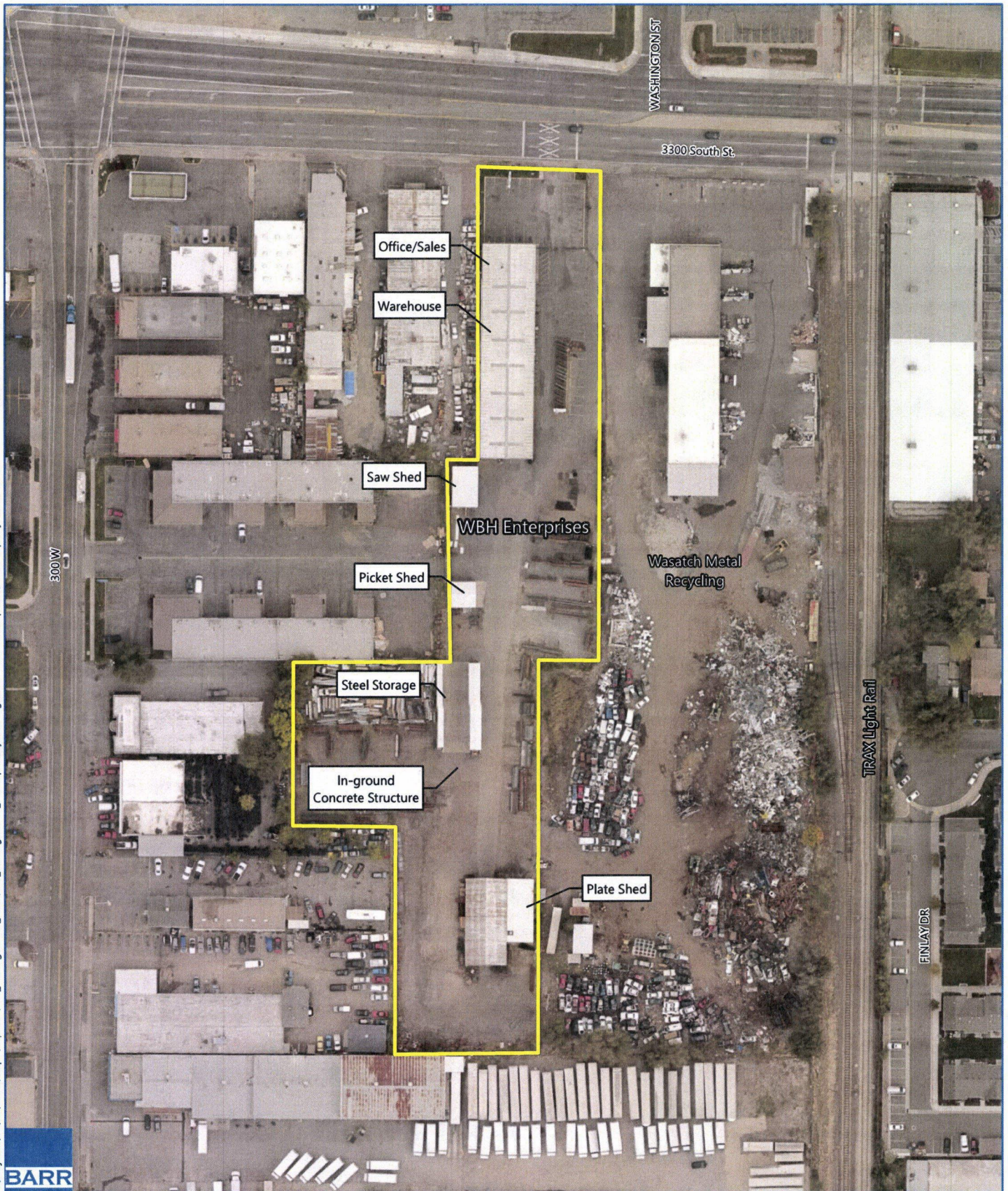
Director
Utah Department of Environmental Quality
Division of Waste Management and Radiation Control
195 North 1950 West
P.O. Box 144880
Salt Lake City, Utah 84114-4880
801-536-0200


5.0 References

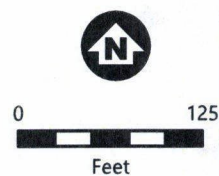
- Barr. 2019a. Phase I Environmental Site Assessment, 243 West 3300 South, South Salt Lake, Utah, Barr. April 2019.
- Barr. 2019b. Limited Phase II Environmental Investigation, 243 W. 3300 South, South Salt Lake, Utah, Barr. May 2019.
- Barr. 2019c. Phase III Investigation and Soil Remediation Report, WBH Enterprises Property, 243 W. 3300 South, South Salt Lake, Utah, Barr. September 26, 2019.
- UDEH. 1991. Letter from Kent P. Gray, Director, Utah Bureau of Environmental Response and Remediation to John King, Tetra Tech. May 21, 1991.
- USEPA. 2017. Transmittal of Update to the Adult Lead Methodology's Default Baseline Blood Lead Concentration and Geometric Standard Deviation Parameters Calculations of Preliminary Remediation Goals (PRGs) for Soil in Nonresidential Areas. U.S. EPA Technical Review Workgroup for Lead, Adult Lead Committee. OLEM Directive 9285.6-56. May 17, 2017.
- USEPA. 2019. Regional Screening Levels for Chemical Contaminants at Superfund Sites. May 2019 update. <https://www.epa.gov/risk/regional-screening-levels-rsls>.

Figure 1

WBH Enterprises, LLC Property



 Property Boundary



WBH Enterprises,
LLC Property
243 W 3300 South
South Salt Lake, UT

FIGURE 1

Figure 2

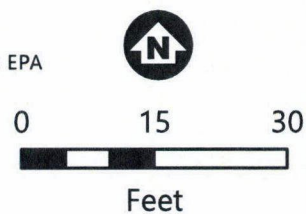
Soil Remediation and Asphalt Maintenance Area



BARR

- Surface Soil Sample
- Confirmation Sidewall Samples
- Soil Berm
- Excavation
- Confirmation Floor Samples
- Asphalt Maintenance Area
- Property Boundary

163 Lead (mg/kg)
1,030 Analytical result exceeds EPA PRG for lead.



SOIL REMEDIATION
 AND ASPHALT
 MAINTENANCE AREA
 243 W 3300 South
 South Salt Lake, UT

FIGURE 2