

Site Management Plan

JW Investment Real Estate, LLC

3571 South 300 West

Salt Lake City, Utah

December 16, 2019

Terracon Project No. 61177310



Prepared for:

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December 16, 2019

Mr. Eric Baiden
Risk Assessor
Utah DEQ Division of Waste Management and Radiation Control
195 North 1950 West, 2nd floor
Salt Lake City Utah 84116

Re: Site Management Plan
JW Investment Real Estate, LLC
3571 South 300 West Salt Lake City, Utah
Terracon Project No. 61177310

Dear Mr. Baiden:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Draft Final Site Management Plan (SMP) for managing impacted soil and groundwater at the above-referenced site. We have left it in a Draft Final Version waiting your approval. Upon receiving your approval we will have the Construction Restricted Area surveyed and we will finalize the report.

If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,

Curt A. Stripeika
Senior Project Manager

Kent Wheeler
Regional Manager

Cc: Brad Cahoon



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- Exhibit 2 – Site Diagram with Sample Locations
- Exhibit 3 – Construction Restricted Area
- Exhibit 4 – Map of Parcel 1

1.0 INTRODUCTION

1.1 Site Description

Limited corrective action has been performed at the property located at 3571 South 300 West in Salt Lake City, comprising approximately 4.6 acres. The site investigations showed that impacts are confined to Parcel 1 (Parcel No. 15-36-202-023) of the larger property. Parcel 1 is an approximately 1.9 acre portion of the property. This Site Management Plan applies to Parcel 1. **Exhibit 1 (Appendix A)** presents the site location on a portion of the USGS 7.5-minute series topographic map. **Exhibit 2** is a site diagram showing pertinent site features. **Exhibit 3** shows the location of Construction Restricted Area.

1.1.1 Legal Description

Parcel 1 (as shown in **Exhibit 4**) comprises about 1.90 acres and is described as follows:

Beginning at a point on the East right-of-way line of 300 West Street, said point lies North 89°56'58" East 353.50 feet and South 00°05'30" West 1026.65 feet, from the Northwest Corner of the Northeast Quarter of Section 36, Township 1 South, Range 1 West, Salt Lake Base and Meridian, said point also being South 00°05'30" West 942.24 feet and South 89°54'30" East 33.00 feet from Salt Lake County monument no. 1S1W368A, and running thence North 89°17'30" East 495.79 feet; thence South 00°05'00" West 192.78 feet; thence North 89°48'57" West 115.76 feet; thence North 00°05'30" East 30.86 feet; thence South 89°24'56" West 380.03 feet to said East right-of-way line; thence North 00°05'30" East along said line 159.30 feet to THE POINT OF BEGINNING.

1.2 Site Background

The Revised Corrective Action Plan (*Terracon, August 6, 2018*) to remove impacted soils from the Construction Restricted Area was approved by the State of Utah, Department of Environmental Quality (DEQ) Division of Waste Management and Radiation Control (DWMRC) on August 17, 2018. The removal action was implemented at the site between October 22, 2018 and October 26, 2018. Details of the implementation of the CAP are provided in the Limited Corrective Action Implementation Report (*Terracon June 2019*).

1.3 Soil Impacts

Site investigations did not identify impacted soils above the Environmental Protection Agency's (EPA) Regional Screening Levels (RSLs) for industrial workers (*Limited Site Investigation, 2016*). While the soil impacts were below the RSLs, these soils were identified as the source area for the groundwater impacts. As per the Corrective Action Plan approval letter (*DERR, 2018*), the removal of the soils from the Construction Restricted Area will promote the natural attenuation of the PCE impacted groundwater.

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Soils in the Construction Restricted Area were removed to minimize a potential source of groundwater impacts. The soil was excavated to a depth of 5 feet below the site grade, with a total removal mass of 289 tons of soil. Bearing walls and foundations surrounding the excavation area prevented removal of all impacted soils, and some impacted soils remain in the Construction Restricted Area. Confirmation sampling completed after soil removal (*Limited Corrective Action Implementation Report, 2019*), confirmed that remaining impacts were below the Action Levels in the Construction Restricted Area (see Table 1).

1.4 Groundwater Impacts

Only the chlorinated compounds (PCE, TCE, and methylene chloride, and their degradation products cis & trans DCE and vinyl chloride) were present above the EPA maximum contaminant levels (MCLs) for drinking water. Outside of the Construction Restricted Area, the groundwater impacts exceeding MCLs were limited to 3 locations (BH-1, BH-2, and BH-5) (*Limited Site Investigation, 2016*).

Outside of the Construction Restricted Area, the groundwater impacts exceeding VISLs were limited to 3 locations (BH-1, BH-2, and FW-1), all west of the former Regional Supply building within Parcel 1 (*Limited Site Investigation, 2016*).

2.0 RISK ASSESSMENT AND SITE-SPECIFIC SCREENING LEVELS

The COCs identified in the Revised Limited Corrective Action Plan (*Terracon, 2018*) are tetrachloroethene (PCE), trichloroethene (TCE), cis 1,2 dichloroethylene (cis 1,2 DCE), trans 1,2 dichloroethylene (trans 1,2 DCE), methylene chloride and non-chlorinated solvents (acetone, benzene, sec-butyl benzene, toluene and trimethylbenzene).

Five of the COCs found in the soils at the Construction Restricted Area were chlorinated compounds, three of these chlorinated compounds are commonly used solvents (PCE, TCE, and methylene chloride) while the remaining chlorinated compounds are generally the breakdown products of the PCE, TCE and methylene chloride. The origin of these chlorinated solvents was not identified (*Limited Site Investigation, 2016*).

A Human Health Risk Assessment was not conducted as no complete exposure pathways exist. Therefore, EPA Regional Screening L (RSLs) and Construction Worker Screening Levels were used as Action Levels for the site. Applicable action levels are presented in Table 1. The RSLs in Table 1 are from EPA's November 2018 RSL generic tables which use a hazard quotient (HQ) of 1.0 and a target cancer risk of 1×10^{-6} and EPA default values. The Construction Worker Screening Levels (SLs) were generated using EPA's November 2018 Regional Screening Level calculator for "Construction Worker Soil Exposure to Other Construction Activities" utilizing calculator default values, a HQ of 1.0 and a target cancer risk of 1×10^{-6} .

**Table 1
Action Levels**

COC	Industrial RSL (mg/kg)	Construction Worker SLs (mg/kg)
PCE	100	85.4
TCE	6	3.93
cis 1,2 DCE	2300	11.2
trans 1,2 DCE	23000	1240
methylene chloride	1000	1890
Acetone	670000	245000
Benzene	5.1	28.3
Trimethylbenzene 1,2,3	NA	1530
Trimethylbenzene 1,2,4	1800	1300
Trimethylbenzene 1,2,5	1500	1110
sec-butyl benzene	125000	33900
toluene	47000	18200

3.0 SITE MANAGEMENT PROCEDURES

For purposes of this SMP, the following definitions are used:

Construction Restricted Area: The legal description of the Construction Restricted Area is as follows:

To be added after approval by UDEQ

Impacted soil: Soil with contaminant concentrations that exceed the EPA Industrial RSLs.

3.1 Soil and Groundwater Management Procedures

Soils with potential contaminant concentration exceeding EPA Construction Worker RSLs may be present in the Construction Restricted Area. If future site activities or new development disturbs soils within the Construction Restricted Area, the soils must be evaluated to ensure they are protective of construction workers and the environment.

During future construction activities, all construction workers in contact with the soil in the Construction Restricted Area will work under guidance of a Site Specific Site Safety and Health Plan, until it can be documented that soil impacts are below EPA Construction Worker SLs.

Based on site investigations and the Limited Corrective Action Implementation Report (Terracon, 2019), impacts could be encountered during the installation of new foundations, new

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utilities, or subsurface repairs in the Construction Restricted Area. While soil impacts have not been observed to exceed the EPA Industrial RSLs or the Construction Worker SLs, the soils must be sampled to documented that the concentrations are below the Action Levels established in Table 1 for the site. All sampling must be performed by qualified personnel, and samples must be analyzed by a state-certified laboratory.

3.1.1 Soil Segregation, Loading and Transport

In general, excavated soils from the Construction Restricted Area must be stockpiled, sampled for characterization for appropriate use(s) or disposal, and managed according to this SMP. Soils from the Construction Restricted Area must be segregated and stockpiled on visqueen, or on an intact hardscape surface (e.g., asphalt or concrete) to prevent contact with *non-impacted soils*. In order to limit precipitation runoff and generation of fugitive dust, stockpiled soils must be placed in containers or covered with plastic. Stockpiles should be situated away from work areas to the extent possible to avoid disturbing the piles.

Impacted Soil shall be loaded within the Construction Restricted Area. Trucks leaving the Construction Restricted Area with Impacted Soil must be covered with tarps and cleaned of spilled debris that might fall from the trucks during transport. The contractor must prevent debris from being spilled from trucks or tracked from the Construction Restricted Area onto local streets.

All Impacted Soils transported offsite for disposal must be transported under a Bill of Lading (BOL) or non-hazardous waste manifests after receiving pre-approval of the shipment from the receiving facility.

In the unlikely event that any Impacted Soil is determined to constitute a regulated hazardous waste, it shall be loaded and transported by an approved licensed hazardous waste contractor in accordance with state and federal regulations.

3.1.1.1 Soil Sampling

Stockpiled materials must be sampled at a frequency of 1 sample per 200 cubic yards of in-place soils. The sample must consist of a 5-point composite soil sample. The composite soil sample must be collected in a re-sealable bag (e.g., Ziploc® or equivalent) and homogenized. Once homogenized, the sample must be transferred to a laboratory-supplied sample container, placed in a cooler with ice, and transported under proper chain-of-custody procedures to a Utah-certified analytical laboratory. Soils must be analyzed for Volatile Organic Compounds (VOCs) using EPA Method 8260b.

Quality control for the sampling program must include using standardized sample collection and handling methods, documenting pertinent field information, and keeping chain-of-custody records.

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3.1.1.2 Criteria for Management of Soils

Results of the sample analyses will determine the usability of the soils.

- Non-impacted soils may be used anywhere on the site or taken offsite for use as fill material, excluding residential use or comparable use unless it can be demonstrated that the fill material meets unrestricted use. UDEQ/DWMRC Director approval will be required
- Impacted Soils must be removed from the site and must be disposed of at an appropriately-permitted offsite disposal facility.

3.1.2 Soil Disposal

If stockpiled soil is determined to be considered Impacted Soils, it will be disposed of offsite. The Impacted Soils must be disposed of in a lawful manner consistent with all pertinent federal, state, and local environmental regulations, and documentation must be provided to UDEQ.

Appropriate disposal locations may include ET Technologies' Soil Regeneration Site or a Subtitle C or D Landfill. Acceptance of the impacted soils by the selected disposal facility may require additional sampling. Prior to the soils being removed from the site, the disposal facility must provide a letter or other written communication declaring the soils meets their acceptance criteria.

3.1.3 Groundwater Disposal

In the event that groundwater is encountered during site work or construction activities, appropriate worker protection measures must be followed. In addition, if construction dewatering is required, the water must be characterized, and possibly staged. The associated discharges must be managed following applicable local, state, and federal regulations.

3.2 Institutional Controls

The following Institutional Controls are detailed in the Environmental Covenant (EC) for the property.

3.2.1 Land Use Restriction

The land use at Parcel 1 shall be limited to commercial/industrial uses consistent with the applicable local zoning laws. Parcel 1 may not be used for residential development or other comparable uses (hospitals, homeless shelters, nursing homes, assisted living, etc.) unless it can be demonstrated to the satisfaction of the Director of DWMRC that the level of risk present at Parcel 1 is consistent or acceptable for a residential land use.

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3.2.2 Groundwater Use Restrictions

As per the EC, groundwater beneath Parcel 1 may not be extracted or used.

3.2.3 Site Access

The EC grants access to DWMRC for implementing or enforcing the applicable sections of the EC.

4.0 WORKER HEALTH AND SAFETY REQUIREMENTS

The Owner shall inform any contractor conducting subgrade work on the site of the presence of potential Impacted Soils that could be encountered in the Construction Restricted Area. Contractors that could come into contact with Impacted Soils shall prepare a Site-Specific Health and Safety Plan that addresses the tasks and potential contaminants that could be encountered, and any appropriate procedures and personal protective equipment (PPE) that could be required. It will be the Contractor's responsibility to ensure that worker protection and training meet all Occupational Safety and Health Administration (OSHA) requirements.

5.0 DOCUMENTATION

Following the completion of construction activities, the environmental professional must prepare a report documenting activities conducted at the site associated with Impacted Soils. The report will include the following:

- Documentation of field activities
- Site plan showing pertinent site features
- Waste characterization analytical laboratory results
- Documentation of disposal (e.g., disposal manifests or weigh tickets)
- Recommendations concerning further action, if necessary

The report will be provided to the Owner.

6.0 CONTINGENCY PLAN

If unforeseen events or unexpected contamination are encountered, UDEQ will be notified and a contingency plan will be developed in consultation with UDEQ to address the situation.

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7.0 REFERENCES

Limited Site Investigation, Regional Supply Facility, 3571 South 300 West Salt Lake City, Utah, November 29, 2016, Terracon Project No. 61167310

Revised Limited Corrective Action Plan, Regional Supply Facility 3571 South 300 West, Salt Lake City, Utah, August 6, 2018, Terracon Project No. 61177310

Limited Corrective Action Implementation Report, JW Investments, LLC 3571 South 300 West, Salt Lake City, June 2019, Terracon Project No. 61177310

APPENDIX A

- Exhibit 1 – Topographic Map
- Exhibit 2 – Site Diagram with Sample Locations
- Exhibit 3 – Construction Restricted Area
- Exhibit 4 – Map of Parcel 1

