

**SITE MANAGEMENT PLAN  
WASATCH PALLET  
521 SOUTH 1550 WEST  
SPANISH FORK, UTAH**

**Project No. 1870-007E**

**To:**

**Mr. Doug Hansen, 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**

**Prepared for:**

**Mr. David Neilson  
SOD Enterprises, LLC  
743 West Pegasus Drive  
Kaysville, Utah 84037**

**Prepared by:**

**Wasatch Environmental, Inc.  
2410 West California Avenue  
Salt Lake City, Utah 84104**

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### Exhibits

Exhibit A – Property Location Property Use Map, Monitoring Well and Historical Sample Location Map, and PAH Exceedance and Restricted Areas Map

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## **1. INTRODUCTION**

Wasatch Environmental, Inc., (Wasatch) has prepared this Site Management Plan (SMP) to present the planned long-term approach for managing residual polycyclic aromatic hydrocarbon impacts to soil and nitrate/nitrite impacts to groundwater at the Wasatch Pallet property (Property) located at 521 South 1550 West in Spanish Fork, 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, engineering controls, groundwater limitations, and disturbance limitations. The Owner shall notify the Utah Department of Environmental Quality, Division of Waste Management and Radiation Control (DWMRC) within 20 days after each transfer of ownership of all or any portion of the Property. The Owner's notice to DWMRC shall include the name, address and telephone number of the Transferee, a copy of the deed or other documentation evidencing the conveyance, and an unsurveyed plat that shows the boundaries of the property being transferred.

### **1.1 Site Description**

The Property is an approximately 17.3-acre tract of real property, further identified as Tax Parcel Number: 25:016:0025. At the time of this document, the Property is occupied by Wasatch Pallet (a pallet refurbishing and manufacturing business) and Burningham Trucking (a trucking company that produces agricultural products and concrete materials). See Exhibit A for applicable maps of the Property. The legal description of the Property is:

Commence West 1215.43 feet and South 212.01 feet and South 47°07'26" West 177.5 feet from East 1/4 corner section 23, T8S, R2E, SLM; South 21'11" West 1930.10 feet; North 51°17'04" West 677.21 feet; North 2°38'46" East 985.31 feet; North 38°31'33" East 307.91 feet; North 47°07'26" East 413.50 feet; to beginning area. Contains 17.3 acres.

### **1.2 Site Background**

Wasatch completed a Phase I Environmental Site Assessment dated August 27, 2021, for the Property which identified the following recognized environmental conditions:

- The Property was originally developed in 1916 as a sugar beet processing facility that appears to have operated through approximately 1952 and may have included a leather tannery business for less than a year in the 1930s. Previous investigations at the Property focused within the northwestern portion of the Property and primarily near a former biodiesel fuel aboveground storage tank (AST). Releases from this former biodiesel AST represent a historical recognized environmental condition. However, sugar beet processing activities included other areas of potential environmental concern, including the following: the southern portion of Building 1 – refinery that formerly included 40-gallon chemical tanks; Building 4 – former boiler house; former buildings to the south of Building 4 – machine shop, lime house (with a lime kiln), and a trash catcher; concrete coal bins to the north of Building 4; a beet laboratory/scale house; a former approximately 2,000-gallon gasoline AST; and a former approximately 10,000-gallon diesel fuel AST. Additionally, several of the industrial buildings are connected to septic systems and may include floor drains that were not observed at the time of our site visit. The likelihood of releases

from these former activities that do not appear to have been previously investigated represent a recognized environmental condition.

- The Property included a coke (coal byproduct) processing facility from the 1980s through the mid-2000s. In 2017, semi-volatile organic compounds (SVOCs) were detected in soil samples at the Property at concentrations exceeding United States Environmental Protection Agency (U.S. EPA) Regional Screening Levels (RSLs) for Residential and Industrial Soil. Subsequent investigations on the Property have not addressed the presence of SVOCs. The presence of SVOCs in soil exceeding U.S. EPA RSLs for Residential and Industrial Soil would be considered a recognized environmental condition.
- The Property currently contains a service garage that includes automotive/equipment maintenance/service. One used oil AST, a few 55-gallon drums, and numerous small-volume containers of automotive fluids were observed within or near the service garage. Additionally, areas of staining of exposed soils were also observed near an AST and drums to the east of the service garage. The likelihood of releases from automotive activities represents a recognized environmental condition.

To evaluate the identified recognized environmental conditions, Wasatch completed 10 soil borings that facilitated the collection of soil and groundwater samples across the Facility. Based on the soil and groundwater data, nitrite/nitrate impacts to groundwater exceeding the applicable U.S. EPA Maximum Contaminant Levels (MCLs) appear to be located on the northern portion of the Facility, layers of coal remain at the Facility, polynuclear aromatic hydrocarbons (PAH) impacts to soil were detected at concentrations that exceed their applicable U.S. EPA RSL for Residential and Commercial Soil.

Given that the Property is planned for residential redevelopment with some commercial use, Wasatch recommended that the PAH impacts to soil be fully characterized to facilitate the remediation or mitigation of these impacts to support residential redevelopment.

The Utah Division of Water Quality (DWQ) requested that additional monitoring wells be installed at the Property and that quarterly groundwater samples be collected to further evaluate the nitrite and nitrate in groundwater.

From February 2022 through March 2022, Wasatch completed 24 additional soil borings at the Property to define the nature and extent of PAH impacts to soil. Additionally, Wasatch installed and developed four additional groundwater monitoring wells at the Facility. Wasatch has completed two quarterly groundwater monitoring events at the Facility.

Coal was observed in the following borings: GP-13 (from 2 feet to 4 feet below ground surface [bgs]), GP-14 (from 2 feet to 4 feet bgs), GP-15 (from 1 foot to 2 feet bgs), GP-18 (from 1 foot to 2 feet bgs), GP-19 (from 0.5 feet to 3 feet bgs and at 7 feet bgs), GP-20 (from 3 feet to 4 feet bgs), GP-21 (from 4 feet to 5 feet bgs and from 7 feet to 9 feet bgs), GP-22 (from 2.5 feet to 3 feet bgs), GP-25 (from the ground surface to 1.5 feet bgs), and GP-27 (from the ground surface to 1.5 feet bgs).

PAH impacts are present across a majority of the Property at concentrations exceeding their applicable U.S. EPA RSL for Residential Soil. The majority of the impacts are located within the upper 3 feet of soil at the Facility. However, deeper PAH impacts were detected in the GP-14 (down to 7 feet bgs) and GP-28 (down to 5 feet bgs) borings.

Based on the totality of the soil data, it is Wasatch's opinion that the PAH impacts and areas of coal have been sufficiently delineated. See Figure 2 for a historical sample location map.

The Utah Division of Waste Management and Radiation Control (DWMRC) has reviewed the Additional Subsurface Investigation Report dated April 13, 2022, and concurred that the impacts at the Property have been sufficiently defined. DWMRC requested that a Corrective Action Plan (CAP) be submitted to facilitate the regulatory closure of the Property to support residential use. A Human Health Risk

Assessment (HHRA) and Ecological Risk Assessment (ERA) was completed to determine the appropriate activities to achieve regulatory closure to facilitate future residential use of the Property.

## 2. RISK ASSESSMENT

HHRA and ERA activities have been performed for the Property and is documented in detail in the HHRA and ERA report completed by Wasatch and dated May 2, 2023. DWMRC approved the results documented in this report in a letter dated May 11, 2023. The conclusions of this effort are described below.

### 2.1 Human Health Risk Assessment

Based on the totality of the data and the risk assessments/background evaluation, the soil and groundwater at the Property has been sufficiently defined, and the risks associated with these impacted media have been accurately calculated.

For the purposes of the risk assessment, the Property was divided into two exposure areas as follows:

- A "Hot Spot," consisting of the soil at sample locations GP-6, GP-7, and GP-13. See Figures 2 and 3 for sample locations. The legal description of the Hot Spot area is as follows: Southeast quarter of Section 23, T8S, R2E, SLB&M. Beginning at a point S89°58'53"E 934.30 feet along the Section Line (Basis of Bearing) and N0°01'07"E 1218.63 feet from the South Quarter Corner of Section 23, Township 8 South, Range 2 East, Salt Lake Base and Meridian; thence N70°54'00"W 50.00 feet; thence N4°19'00"W 46.48 feet; thence S88°53'00"E 26.10 feet; thence N1°23'00"E 64.40 feet; thence S88°35'00"E 45.50 feet; thence N1°27'00"E 179.60 feet; thence S88°30'00"E 81.10 feet; thence N1°32'00"E 53.60 feet; thence S89°49'00"E 141.00 feet; thence S0°36'00"W 212.00 feet; thence S41°02'00"W 121.03 feet; thence S72°39'00"W 176.81 feet to the point of beginning. Contains 1.6181 acres. Bearings are NAD\_83 State Plane, Utah Central Zone and ground distances.
- The rest of the Property with impacts excluding the Hot Spot is referred to as the "Main Site." The legal description of the Main Site area is as follows: Southeast quarter of Section 23, T8S, R2E, SLB&M. Beginning at a point S89°58'53"E 862.35 feet along the Section Line (Basis of Bearing) and N0°01'07"E 1270.63 feet from the South Quarter Corner of Section 23, Township 8 South, Range 2 East, Salt Lake Base and Meridian; thence N0°41'00"W 477.30 feet; thence N26°40'00"E 80.09 feet; thence N38°52'00"E 158.00 feet; thence N45°12'00"E 194.00 feet; thence N81°00'00"E 23.00 feet; thence S34°18'00"E 115.00 feet; thence S2°36'00"E 737.00 feet; thence S49°50'00"W 192.00 feet; thence N80°05'00"W 228.00 feet; thence N9°09'00"W 105.00 feet to the point of beginning. Contains 5.259 acres. Bearings are NAD\_83 State Plane, Utah Central Zone and ground distances.

#### 2.1.1 Main Site Residential Risk

Based on the HHRA, the resulting refined cancer risk is 2E-06. The refined cancer risk is slightly above the target level of 1E-06 but is within the risk range of 1E-06 to 1E-04.

Based on the HHRA, the initial Hazard Index (HI) based on maximum detections in soil is 0.3, which is below the R315-101 target level of 1.0. Additional analysis of noncarcinogenic effects is not required.

The maximum detected lead concentration from 0-10 feet bgs interval is 79.7 mg/kg, which does not exceed the U.S. EPA RSL for Residential Soil of 400 mg/kg. Therefore, assumed exposures to lead in soil are unlikely to result in adverse health effects and additional evaluation for lead is not required.

### 2.1.2 Hot Spot Residential Risk

Based on the HHRA, the resulting refined cancer risk is 4E-05. The refined cancer risk exceeds the target level of 1E-06 but is within the risk range of 1E-06 to 1E-04.

Based on the HHRA, the initial HI based on maximum detections in soil is 0.7, which is below the R315-101 target level of 1.0. Additional analysis of non-carcinogenic effects is not required.

The maximum detected lead concentration from 0-10 feet bgs interval is 304 mg/kg, which does not exceed the U.S. EPA RSL for Residential Soil of 400 mg/kg. Therefore, assumed exposures to lead in soil are unlikely to result in adverse health effects and additional evaluation for lead is not required.

### 2.1.3 Main Site Industrial Risk

Based on the HHRA, the resulting refined cancer risk is 4E-07, which is below the target level of 1E-06.

Based on the HHRA, the initial HI based on maximum detected concentrations in soil is 0.03, which is below the R315-101 target level of 1.0. Additional analysis of noncarcinogenic effects is not required.

The maximum detected lead concentration from the 0-1 ft. depth interval is 79.7 mg/kg, which does not exceed the U.S. EPA RSL for Industrial Soil of 800 mg/kg. Therefore, lead levels are below the U.S. EPA RSL for Industrial Soil and assumed exposures to lead in soil are unlikely to result in adverse health effects. Additional evaluation for lead is not required.

### 2.1.4 Hot Spot Industrial Risk

Based on the HHRA, using the maximum detected concentrations as the initial exposure point concentration (EPC), the resulting cancer risk is 3E-06, which exceeds the R315-101 target level of 1E-06 but is within the risk range of 1E-06 to 1E-04.

Based on the HHRA, the initial HI based on maximum detected concentrations in soil is 0.03, which is below the R315-101 target level of 1.0. Additional analysis of noncarcinogenic effects is not required.

The maximum detected lead concentration from the 0-1 ft. depth interval is 84.2 mg/kg, which does not exceed the U.S. EPA RSL for Industrial Soil of 800 mg/kg. Therefore, lead levels are below the U.S. EPA RSL for Industrial Soil and assumed exposures to lead in soil are unlikely to result in adverse health effects.

## 2.2 Ecological Risk Assessment

Based on the HHRA which includes an ERA, under current conditions, the Property does not have any viable habitat for ecological receptors, nor any ecological community, i.e., the Property is currently an industrial facility and will be redeveloped into a high density residential area. No complete exposure pathways are present based on current or planned site conditions. However, future conditions at the Facility may contain areas that could potentially allow plant growth and suitable habitat for small wildlife, such as a deer mouse, and horned lark, if the current land use were to change.

While the Main Site was evaluated, the Hot Spot has been excluded from the ERA as a result of the HHRA. The HHRA recommended that engineering controls, removals, or other measures be taken to prevent human contact with soil. This will also prevent ecological exposures to soils within the Hot Spot. Therefore, the Hot Spot is not evaluated further in the ERA.

The analysis showed minimal risk to the deer mouse (HI of 0.1), horned lark (HI of 1), and generic plants (HI of 0.5). The ERA concluded that, as the exposure area is very small in size and the Property is in a highly developed area, the HI of 1 for horned lark does not indicate an adverse risk to localized ecological receptors or impact to horned lark populations.

### **2.3 Conclusions of the HHRA and ERA Report**

Based on the totality of the data and the risk assessments, it is Wasatch's and DWMRC's opinion that the Property has been sufficiently defined, and the risks associated with these impacts have been accurately calculated. Wasatch proposed that a SMP and EC be completed for the Property to facilitate a "Closure with Controls" status. Additionally, some soil excavation and off-site disposal activities (to facilitate geotechnical requirements) may be required, which may include confirmation sampling and the potential re-evaluation of risks if a significant volume of impacted soil is removed from the Facility.

As approved by the Utah DWMRC, residual exposure risks that exist can be adequately managed through land use controls and engineering controls.

## **3. SITE MANAGEMENT**

The only restricted portions of the Property are the Main Site and the Hot Spot as defined above.

### **3.1 Engineering Controls**

#### **3.1.1 Main Site Capping Requirements**

All portions of the Main Site that are not considered to be private residential properties including but not limited to roadways, parking areas, sidewalks, communal greenspace or other communal areas, commercial property, and industrial property, do not require any capping or engineering controls.

All portions of the Main Site that are considered to be private residential property require the following capping engineering controls. All portions of the property will be capped with one or more of the following materials: one foot of clean soil topped with landscaping materials, hardscape materials such as concrete and asphalt pavement, or an impermeable membrane such as a geotextile. Note that for high density apartment complexes, only the apartment complex itself is considered to be residential property, the remainder of those properties are considered to be commercial.

#### **3.1.2 Hot Spot Capping Requirements**

All portions of the Hot Spot require the property be capped with one or more of the following materials: one foot of clean soil topped with landscaping materials, hardscape materials such as concrete and asphalt pavement, or an impermeable membrane such as a geotextile.

### **3.2 Activity and Use Limitations**

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

#### **3.2.1 Site Management Plan**

The Owner shall comply with this SMP.

### 3.2.2 Land Use Limitations

The Property is suitable for residential, commercial, and industrial use consistent with applicable local zoning laws. Planting crops or fruit trees for consumption by humans or livestock is prohibited.

### 3.2.3 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 Property shall be subject to review and approval by the Director prior to implementation.

### 3.2.4 Disturbance Limitations

Appropriate care shall be exercised during construction, remodeling, and maintenance activities within the Main Site and Hot Spot areas at the Property so as to prevent exposure to PAH-impacted soils. If soil disturbances are required in the Hot Spot or within the areas of the Main Site that are considered to be private residential properties, the following apply:

1. Workers shall be required to comply with the Occupational Safety and Health Administration (OSHA) training for hazardous materials.
2. Appropriate personal protective equipment (PPE) must be donned by all workers completing the work, and be sufficient to prevent exposure to PAH-impacted soil.
3. If disturbances require the removal and off-Property disposal of PAH-impacted soil, the soil that is removed shall be treated/disposed in accordance with applicable law. Additionally, prior to soil removal and disposal the Utah DWMRC must be notified and approve of the proposed removal and disposal activities, which will include the appropriate soil waste sample characterization and proposed disposal Property. Once the excavation and disposal work are completed, disposal documentation must be submitted to the Utah DWMRC.
4. If disturbances require the temporary excavation of PAH-impacted soils, but do not require off-Property disposal. Then the soils excavated must be segregated, properly stockpiled on plastic and covered with plastic until redeposition, and redeposited and covered with an acceptable capping material as described in Section 3.1.

### 3.2.5 Construction Dewatering Limitation

Dewatering conducted to facilitate construction on the Property may require that the groundwater be treated to reduce contaminant concentrations prior to discharge if being completed within the nitrate impacted area. 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 Property.

### 3.2.6 Vapor Intrusion Limitations

There are no vapor intrusion limitations.

### 3.2.7 Compliance Reporting

Upon request, Owner shall submit written documentation to the UDEQ verifying that the activities and use limitations and engineering controls remain in place and are being followed.



### **3.2.8 Residential Notification and Limitations**

All new residents located within the Main Site or Hot Spot of the Property shall be notified of the contamination. Additionally, residents are not allowed to excavate soil without complying with all limitations described in Section 3.2.4.

### **3.3 Maintenance, Access, and Inspections**

Under the EC, the Owner of any portion of the Property, 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 Property 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.

#### **3.3.1 Notice**

Any party or person desiring to access the Property under authority of the EC shall provide notice to the then current Owner of the affected portion of the Property not less than 48 hours in advance of accessing the Property, 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 Property requiring access as soon thereafter as is reasonably possible.

#### **3.3.2 Disruption**

To the extent that the Holder, the Director or their authorized representatives, conduct any activities on or within any portion of the Property, 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 Property 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 Property 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 Property 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.

### **3.4 Environmental Covenant**

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

### **3.5 Monitoring Requirements**

The Owner shall comply with the engineering controls and activity and use limitation stated in Sections 3.1 and 3.2, and through the use of a homeowner association (or other similar governing body for the Property) monitor the Property to verify that all residents have been notified of the residual PAH impacts to soil and monitor excavations at the Property. The Owner will complete yearly inspections of the required capping materials and document if these materials are in proper order or what remedies were completed to properly restore the capping materials. Upon request from DWRMC, the owner will verify that the engineering controls and activity use limitations remain in place. If such limitations and engineering controls do not remain in place, are not being complied with, or both, the owner shall explain the circumstances to DWRMC. Cessation of monitoring is subject to review and approval by the Director.

### **3.6 Site Management Contacts**

Inquiries concerning the SMP should be directed to the following:

**SOD Enterprises, LLC**  
743 West Pegasus Drive  
Kaysville, Utah 84037  
(801) 243-9630

and

**Utah Department of Environmental Quality**  
**Division of Waste Management and Radiation Control**  
Director  
P.O. Box 144880  
Salt Lake City, Utah 84114-4880  
(801) 536-0200

**EXHIBIT A**

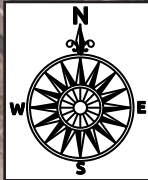
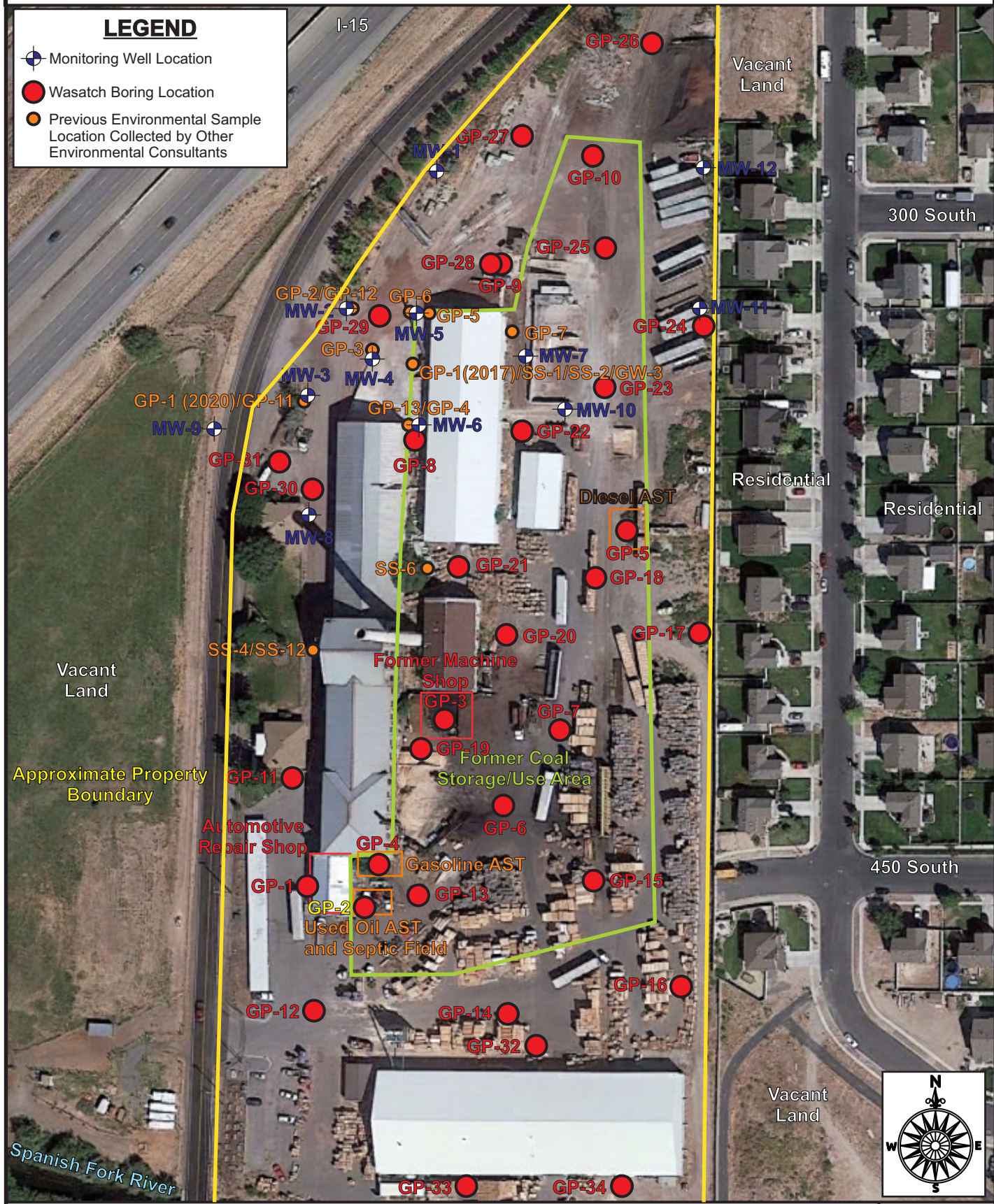
**Property Location and Property Use Map  
Monitoring Well and Historical Sample Location Map  
PAH Soil Exceedance and Restricted Areas Map**  
*(3 pages)*





**LEGEND**

-  Monitoring Well Location
-  Wasatch Boring Location
-  Previous Environmental Sample Location Collected by Other Environmental Consultants



**Monitoring Well and Historical Sample Location Map**

**Figure 2**



**LEGEND**

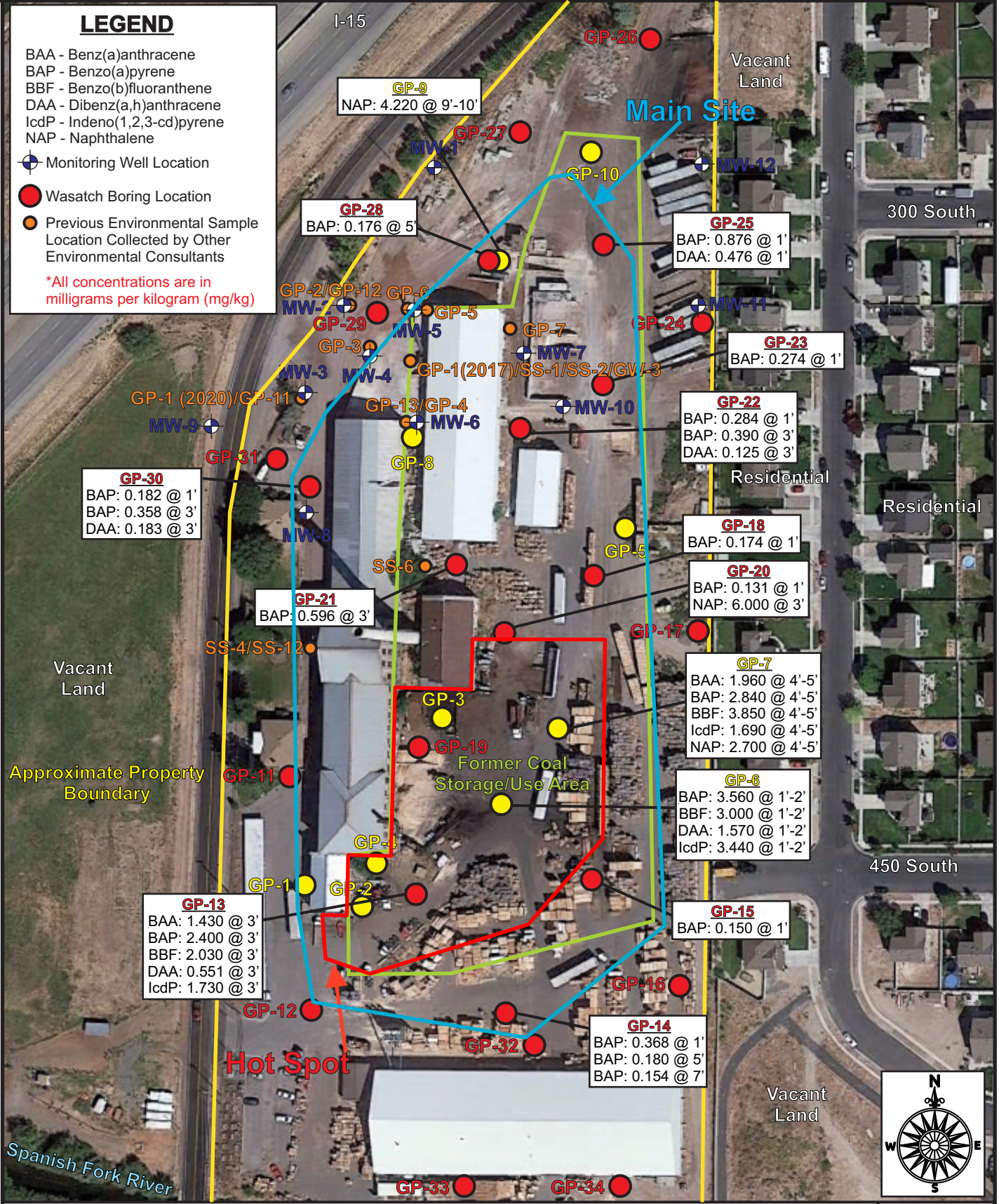
- BAA - Benz(a)anthracene
- BAP - Benzo(a)pyrene
- BBF - Benzo(b)fluoranthene
- DAA - Dibenz(a,h)anthracene
- IcdP - Indeno(1,2,3-cd)pyrene
- NAP - Naphthalene

Monitoring Well Location

Wasatch Boring Location

Previous Environmental Sample Location Collected by Other Environmental Consultants

\*All concentrations are in milligrams per kilogram (mg/kg)



**GP-30**  
BAP: 0.182 @ 1'  
BAP: 0.358 @ 3'  
DAA: 0.183 @ 3'

**GP-21**  
BAP: 0.596 @ 3'

**GP-13**  
BAA: 1.430 @ 3'  
BAP: 2.400 @ 3'  
BBF: 2.030 @ 3'  
DAA: 0.551 @ 3'  
IcdP: 1.730 @ 3'

**GP-28**  
BAP: 0.176 @ 5'

**GP-9**  
NAP: 4.220 @ 9'-10'

**GP-22**  
BAP: 0.284 @ 1'  
BAP: 0.390 @ 3'  
DAA: 0.125 @ 3'

**GP-18**  
BAP: 0.174 @ 1'

**GP-20**  
BAP: 0.131 @ 1'  
NAP: 6.000 @ 3'

**GP-7**  
BAA: 1.960 @ 4'-5'  
BAP: 2.840 @ 4'-5'  
BBF: 3.850 @ 4'-5'  
IcdP: 1.690 @ 4'-5'  
NAP: 2.700 @ 4'-5'

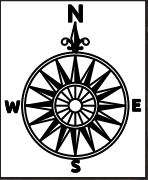
**GP-6**  
BAP: 3.560 @ 1'-2'  
BBF: 3.000 @ 1'-2'  
DAA: 1.570 @ 1'-2'  
IcdP: 3.440 @ 1'-2'

**GP-15**  
BAP: 0.150 @ 1'

**GP-14**  
BAP: 0.368 @ 1'  
BAP: 0.180 @ 5'  
BAP: 0.154 @ 7'

**GP-25**  
BAP: 0.876 @ 1'  
DAA: 0.476 @ 1'

**GP-23**  
BAP: 0.274 @ 1'



1 inch = 145 feet

PAHs Soil Exceedance and Restricted Areas Map

Figure 3