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WASATCH
ENVIRONMENTAL

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December 21, 2017
Project No.: 2229-001

DSHW-2017-011052
Div of Waste Management
and Radiation Control

DEC 21 2017

SUBJECT: Site Management Plan
MJK Fabrication Facility
791 South 9300 West
Ogden, Utah

Wasatch Environmental, Inc., (Wasatch) has prepared this Site Management Plan (SMP) to present the planned approach for long-term management of polynuclear aromatic hydrocarbon impacts to shallow soils following subsurface investigation activities conducted at the MJK Fabrication facility. This SMP has been prepared in accordance with the requirements of R315-101 "Cleanup Action and Risk-Based Closure Standards."

Concurrent with submittal of the SMP, Wasatch is requesting that the MJK Fabrication facility be granted the regulatory closure status of "corrective action complete with controls."

Also, attached is the Environmental Covenant to be recorded.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

WASATCH ENVIRONMENTAL, INC.

Rebecca Studenka

Rebecca Studenka
Senior Project Geologist

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(1) James Christensen, MJK Fabrication
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SITE MANAGEMENT PLAN
MJK FABRICATION
791 SOUTH 9300 WEST
OGDEN, UTAH

Project No. 2229-001

To:

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December 21, 2017

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SITE MANAGEMENT PLAN
MJK FABRICATION
791 SOUTH 9300 WEST
OGDEN, UTAH

1. INTRODUCTION

Wasatch Environmental, Inc , (Wasatch) has prepared this Site Management Plan (SMP) to present the planned long-term approach for monitoring and managing polynuclear aromatic hydrocarbon (PAH) impacts to soil above the United States Environmental Protection Agency (U.S. EPA) Regional Screening Levels (RSLs) for Residential Soil following subsurface investigation activities at the MJK Fabrication facility. This SMP has been developed in an effort to mitigate risks due to PAH contamination at the facility

This SMP has been prepared in accordance with the requirements of R315-101 "Cleanup Action and Risk-Based Closure Standards" that establishes 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. Except as set forth in the Environmental Covenant (EC) recorded with the Weber County Recorder's Office, the "Holder" (as defined in the EC) shall comply with the SMP. Provisions of the SMP relating to the land use limitations shall be the responsibility of the "Owner" (as defined in the EC) of the property.

1.1 Site Description

The MJK Fabrication facility is 46.81 acres in size and consists of one parcel located at 791 South 9300 West in Ogden, Utah. Legal description, parcel number, and address information obtained from the Weber County Assessor's office are presented below:

- Legal Description - PART OF THE SOUTHEAST QUARTER OF SECTION 17, TOWNSHIP 6 NORTH, RANGE 3 WEST, SALT LAKE BASE AND MERIDIAN, U.S. SURVEY: BEGINNING AT A POINT WHICH IS 25 FEET NORTH 89D50' EAST ANDNORTH 0D02'24" EAST 50 FEET FROM THE INTERSECTION OF THECENTERLINE OF 900 SOUTH STREET (BEING THE SOUTH SECTION LINEOF SECTION 17) AND THE WEST LINE OF THE EAST 1/2 OF SECTION17; RUNNING THENCE NORTH 89D50' EAST ALONG THE NORTH LINE OF900 SOUTH STREET 949.8 FEET TO THE WESTERLY LINE OF 9300 WESTSTEET; THENCE NORTH 0D02'24" EAST ALONG THE WESTERLY LINE OF9300 WEST STREET 2219.25 FEET; THENCE SOUTH 89D50' WEST 949.80FEET TO THE CENTERLINE OF EASEMENT AS DEEDED IN BOOK 1229,PAGE 641, PARCEL 1, SAID POINT BEING ON EAST LINE OF THEPROPERTY DEEDED TO THE WESTERN ZIRCONIUM INC IN BOOK 1265,PAGE 698; THENCE SOUTH 0D02'24" WEST ALONG SAID EASTERLY LINE2219.25 FEET TO THE POINT OF BEGINNING. EXCEPTING THEREFROM: THE FOLLOWING DESCRIBED PARCEL:BEGINNING AT A POINT IN THE CENTER OF SPUR RAIL SAID POINTBEING 24.85 FEET NORTH 89D50' EAST ALONG THE SECTION LINE AND1181.94 FEET NORTH 0D02'24" EAST FROM THE SOUTHWEST CORNER OFSAID QUARTER SECTION, RUNNING THENCE NORTH 0D02'24" EAST255.62 FEET ALONG THE CENTERLINE OF SAID SPUR RAIL, THENCENORTH 89D45'54" EAST 268.03 FEET TO AN EXISTING FENCE LINEEXTENDED, THENCE SOUTH 1D16'45" WEST 255.71 FEET ALONG SAIDFENCE AND FENCE LINE EXTENDED THENCE SOUTH 89D45'54" WEST262 50 FEET TO THE POINT OF BEGINNING. LESS & EXCEPTING: ALSO: A PARCEL OF LAND IN FEE, BEINGPART OF AN ENTIRE TRACT OF LAND, SITUATE IN THE SOUTHEASTQUARTER OF SECTION 17, TOWNSHIP 6 NORTH, RANGE 3 WEST, SALTLAKE BASE AND MERIDIAN, INCIDENT TO THE CONSTRUCTION OF 1200SOUTH STREET, WEBER COUNTY, STATE OF UTAH ALSO KNOWN ASPROJECT NO.LG_WC_1200 SOUTH. THE BOUNDARIES OF SAID PARCEL OFLAND ARE DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THEEXISTING

NORTH RIGHT OF WAY LINE OF 1200 SOUTH STREET ON THEWEST LINE OF THE GRANTOR'S PROPERTY, SAID POINT LIES 25.00FEET NORTH 89D50'00" EAST ALONG THE SOUTH LINE OF THESOUTHEAST QUARTER OF SAID SECTION 17 AND 50.00 FEET NORTH00D02'24" EAST FROM THE SOUTHWEST CORNER OF THE SOUTHEASTQUARTER OF SAID SECTION 17; AND RUNNING THENCE NORTH 00D04'03"EAST 1.29 FEET ALONG THE WEST LINE OF SAID GRANTORS PROPERTY;THENCE SOUTH 89D51'12" EAST 236.38 FEET TO A POINT ON THESOUTH LINE OF SAID GRANTORS PROPERTY; THENCE SOUTH 89D50'00"WEST 236 38 FEET ALONG THE SOUTH LINE OF SAID GRANTORSPROPERTY TO THE POINT OF BEGINNING. ROTATE 0D26'18" CLOCKWISETO MATCH HIGHWAY BEARING. THE ABOVE DESCRIBED PARCEL OF LANDCONTAINS 152 SQUARE FEET OR 0.004 ACRES. THE PROPERTY OWNER ISTO RETAIN AN EASEMENT FOR THE PURPOSE OF ACCESS TO AND USE OFTHE DRAINAGE CANAL LYING WITHIN THE 900 SOUTH STREET RIGHT OFWAY. (E# 2820376).

- Parcel Number – 10-038-0014.
- Address – 791 South 9300 West, Ogden, Utah

A Facility Location Map and Facility Parcel Map are presented as Figures 1 and 2, respectively.

1.2 Site Background

The MJK Fabrication facility was previously occupied by Advanced Fluid Containment (AFC Tanks), which engineered and manufactured oil field production tanks, frac tanks, skidded tanks, roll-off boxes, custom tanks, and other custom projects. AFC Tanks operations began on the south adjoining property in 2009 and continued operating in that location until the operations were expanded to include the facility in 2012. In April 2016, AFC Tanks declared bankruptcy and both the facility and south adjoining property were transferred to a court appointed receiver. In May 2016, MJK Fabrication purchased AFC Tanks, including the facility and south adjoining property. MJK Fabrication has continued operations consistent with past AFC Tanks operations since the time of purchase. The facility has been under active investigation by the Utah Division of Waste Management and Radiation (DWMRC) since 2016 for the mismanagement, improper handling, and suspected disposal of drums and containers of spent paint waste and paint solvents at the facility

Based on interview information and site inspections conducted by Utah DWMRC and Wasatch, Utah DWMRC personnel identified the following areas of potential concern:

Building B:

- Exterior of the north side of Building B where drums and containers with stains and evidence of leaking were previously observed;
- The area of the former Conex box where paint mixing and paint wastes and solvents, as well as oily staining, were previously observed;
- An area that Utah DWMRC personnel had observed in historical aerial photographs had been repeatedly disturbed and had mounds of soil that may indicate the potential for buried drums or other wastes;
- An area with several soil stockpiles northeast of Building B where it was indicated that the soil piles may be potential mine tailings;
- The eastern side of Building B where blast media is present;
- An area located north of Building B and immediately south of the area of disturbed soil where blast media is present;
- An area located outside the north site of Building B where blast media is present; and
- An area located inside the southern portion of Building B where used oil was formerly stored and transferred.

Building C:

- An area in Building C where a large funnel was being used to consolidate paint waste into drums. The funnel and drums were situated on a tarp over bare soil; however, Utah DWMRC personnel stated that there had been a complaint that paint waste was being leaked onto the ground surface beneath the tarp.
- Along the western side of the interior of the building where 80 to 100 drums and containers had previously been stored. Soil staining in the area of the drums and containers was previously observed by Utah DWMRC personnel.

In May 2017, Wasatch conducted the following subsurface investigation activities in the area of Building B as depicted on Figure 3:

- Four soil borings (GP-5 through GP-8), which included the collection of four surface soil samples and four subsurface soil samples, were completed along north side of Building B where drums and containers with stains and evidence of leaking were previously observed.
- One soil boring (GP-4), which included the collection of one surface soil sample, was completed in the area of the former Conex box where paint mixing, paint wastes, solvents, and oily staining, were previously observed.
- One sample of blast media (SS-1) and one surficial soil sample from beneath the blast media area (SS-2) was collected from the area located northeast of Building B
- One surficial soil sample (SS-3) was collected from blast media/surficial soil outside the northwestern portion of Building B.
- In the area where soil mounds were observed in historical aerial photographs and there is the potential for buried waste, a visual and magnetometer survey was completed. The magnetometer survey was conducted on 40-foot spaced transects, four transects from east to west, and eight transects from north to south. When the magnetometer survey indicated that buried metal material may be present, test pits were excavated in these areas to evaluate the buried material. Additionally, a X-ray fluorescence (XRF) survey, which included field screening surficial soils using a hand-held meter, was conducted in this area. XRF measurements were obtained in a grid pattern using 40-foot spacings, traversing the area from north to south and east to west, to include 36 sample points. When the XRF detected elevated concentrations of metals, soil samples (SS-7, SS-8, SS-10, and SS-12) were collected for laboratory analysis from these areas.
- In an area of blast media located north of Building B, using a hand-held XRF meter, metal concentrations were measured in a grid-pattern using 20-foot spacings, traversing the area from north to south and east to west, to include 18 sample points as depicted on Figure 2. XRF data were collected in either the most visibly impacted area within each 20-foot spacing, or when there was no obvious staining, or all areas of the grid appear similar, the sample point was shot within the center of the 20-foot spacing. When the XRF detected elevated concentrations of metals, soil samples (SS-13 through SS-17) were collected for laboratory analysis from these areas.
- A visual inspection of the tailings pile was made by observing material at the surface and by using a shovel. The purpose of this inspection was to verify that the material was relatively homogeneous. Following the visual inspection, a hand-held XRF meter was used to measure metal concentrations. The samples were collected in a grid pattern using 20-foot spacings, traversing the area from north to south and east to west to include 18 sample locations. When the XRF detected elevated concentrations of metals, soil samples (SS-18 through SS-21) were collected for laboratory analysis from these areas.

In May 2017, Wasatch conducted the following subsurface investigation activities inside Building C as depicted on Figure 3:

- One soil boring (GP-9), which included the collection of one surface soil sample and one subsurface soil sample, was completed in the paint waste consolidation area; and
- Four soil borings (GP-10 through GP-13), which included the collection of four surface soil

samples and four subsurface soil samples, was completed inside the western portion of the building where soil staining was previously observed in areas previously occupied by drums and containers, and in the former used oil storage area.

Additionally, four surficial background soil samples (GP-1, GP-2. GP-3, and SS-4) were collected from the southern and eastern portions of the subject property in areas with no prior suspected activities (see Figure 3) Temporary piezometers were set in three of these borings (see Figure 3). Top-of-casing elevations were surveyed and depth to groundwater measurements were obtained from three of the temporary piezometers in order to determine groundwater flow direction. Wasatch determined that the groundwater flow direction was to the northeast

Wasatch collected numerous surficial soil, subsurface soil, and groundwater samples at the facility in areas of potential concern as noted by Utah DWMRC personnel as part of these investigative activities. Soil and groundwater samples were analyzed for volatile organic compounds (VOCs), PAHs, and metals. Based on the analytical results, no areas of impact above background or U.S. EPA RSLs for Industrial Soil were identified; however, several PAHs were detected in surficial soils at the facility at concentrations exceeding their respective U.S. EPA RSLs for Residential Soil in Buildings B and C. No VOCs or PAHs were detected in any of the groundwater samples. Dissolved arsenic was detected in all of the groundwater samples, including the background groundwater sample, at concentrations that exceed its federal Maximum Contaminant Level (MCL); however, it is Wasatch's opinion that the elevated groundwater concentrations at the facility are likely representative of regional background arsenic concentrations in groundwater, and are not elevated due to past or current uses of the facility.

2. SITE MANAGEMENT

MJK Fabrication shall implement the following management requirements within the site pursuant to Utah Code R315-101-6.

2.1 Institutional Controls

Based on the PAH concentrations detected in shallow soil in Buildings B and C at the MJK Fabrication facility that exceed the U.S. EPA RSLs for Residential Soil, and as part of the corrective action at the MJK Fabrication facility, the "Owner", Bluemountain, Inc., as defined in the EC, will comply with activity and use limitations placed on the property as outlined in the EC that will be recorded on the property with the Weber County Recorder's Office.

2.1.1 Site Management Plan

Except as specifically set forth in the EC, the Holder shall comply with the SMP submitted to the Utah DWMRC and contained in the Administrative Record described above as it affects the property.

2.1.2 MJK Fabrication Facility Restrictions

The following restrictions apply to the MJK Fabrication facility property·

2.1.2.1 Land Use Restrictions

The land use at the MJK Fabrication facility is limited to commercial/industrial uses consistent with the commercial/industrial worker exposure scenario as described in the Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation, Parts A and B Uses that include managed care facilities, hospitals or any type of business that would require a caretaker to reside on the MJK Fabrication facility property are not approved uses. Uses that would expose children to contaminants at the MJK Fabrication

facility property for extended periods of time (such as day care and school facilities) are also not approved. Residential uses are prohibited.

Future Development or Disturbances. If activities are undertaken that access or disturb soils within Buildings B or C at the MJK Fabrication facility, the impacted soils will be tracked as to where it is deposited within the boundaries of the facility. If it becomes necessary to remove the impacted soils off-site, the soil will be properly characterized, managed, transported, and disposed at an appropriate disposal facility permitted to receive such wastes. Management and disposal of impacted media from within Building B and C at the MJK Fabrication facility must be consistent with all pertinent federal and state environmental laws.

2.1.3 Environmental Covenant

An EC containing the above referenced institutional controls, will be filed for recording in the same manner as a deed to the property, with the Weber County Recorder's Office.

WASATCH ENVIRONMENTAL

Environmental Science and Engineering

FACILITY LOCATION MAP

MJK Fabrication
Ogden, Utah

PROJECT NO.: 2229-001	DATE: 11-7-2017	FIGURE 1

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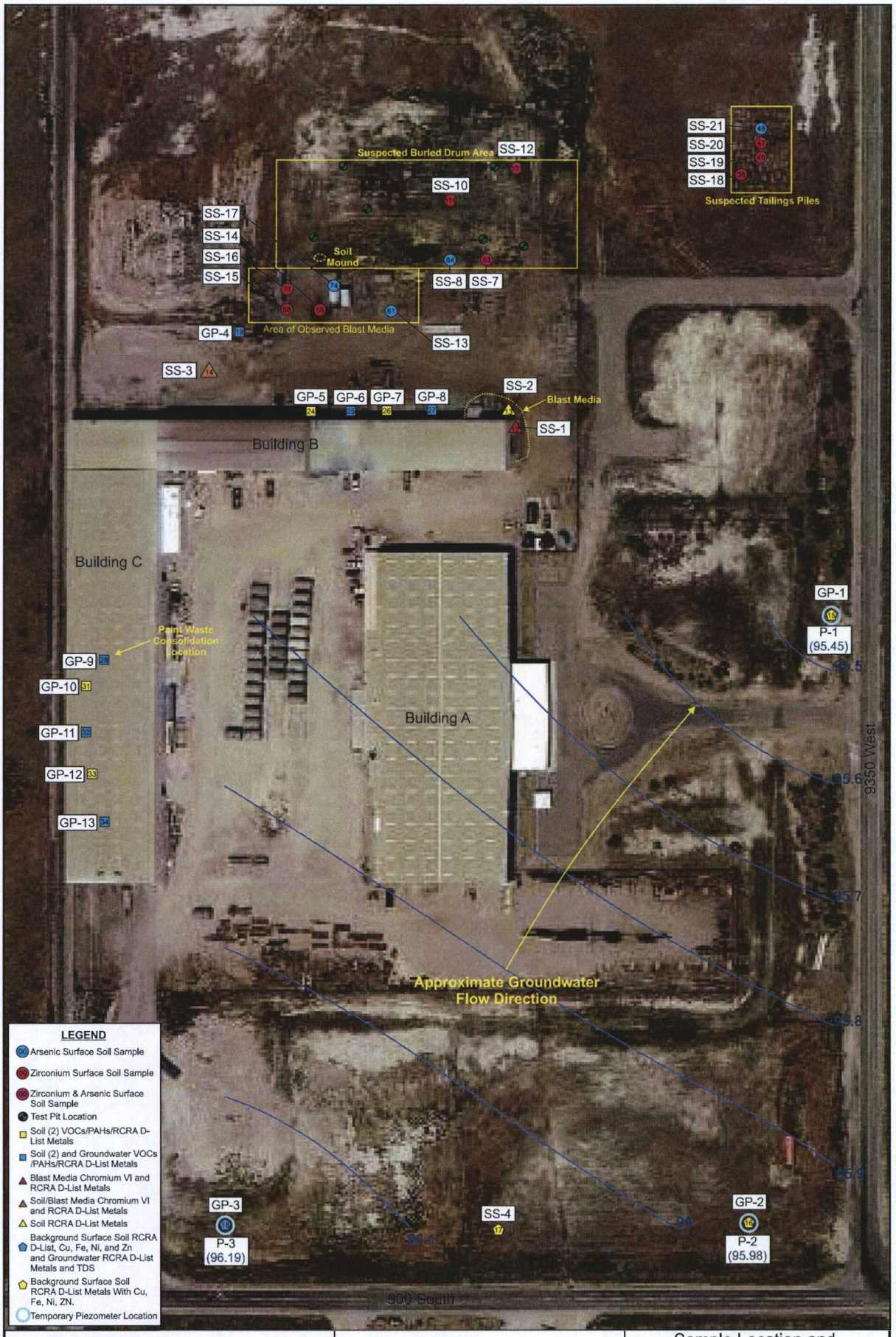
FACILITY PARCEL MAP

MJK Fabrication
Ogden, Utah

PROJECT NO.: 2229-001	DATE: 11-7-2017	FIGURE 2



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Sample Location and Groundwater Contour Map

MJK Fabrication
Ogden, Utah

PROJECT NO.	DRAWING DATE	FIGURE
2229-001	June 28, 2017	3