

# **SITE MANAGEMENT PLAN/ENVIRONMENTAL CONVENANT**

Six States Distributors – Orem  
833 North Industrial Park Road  
Orem, Utah

Prepared for:

**Illinois Tool Works**  
155 Harlem Avenue  
Glenview, Illinois 60025

And

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

Prepared by:

**Wood Environment & Infrastructure Solutions, Inc.**  
10876 S. River Front Parkway  
Suite 250  
South Jordan, Utah 84095

**wood.**

**March 28, 2022**

## TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY .....	1
1.0 INTRODUCTION .....	2
2.0 SITE DESCRIPTION AND MAPS .....	2
2.1 SITE HISTORY .....	2
3.0 RISK ASSESSMENT AND SITE-SPECIFIC SCREENING LEVELS .....	3
3.1 REGULATORY STANDARD EXCEEDANCES .....	3
4.0 SITE MANAGEMENT .....	4
4.1 INSTITUTIONAL CONTROLS.....	4
4.2 SITE MANAGEMENT PLAN .....	4
4.3 SITE FACILITY RESTRICTIONS .....	4
4.3.1 Land Use Restrictions .....	4
4.4 INFILTRATION PREVENTION.....	5
4.5 SITE INSPECTIONS.....	5
4.6 ENVIRONMENTAL COVENANT .....	5
4.7 CONCLUSION .....	6
5.0 LIMITATIONS OF STUDY .....	6
6.0 REFERENCES.....	8
7.0 SIGNATURES.....	8

## FIGURES

Figure 1	Vicinity Map
Figure 2	Groundwater EPA RSL Exceedance Map

## ACRONYMS

bgs	below ground surface
DEQ	Department of Environmental Quality
DWMRC	Division of Waste Management and Radiation Control
EC	Environmental Covenant
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
ISL	Initial Screening Level
ITW	Illinois Tool Works Inc.
MCL	Maximum Containment Concentrations
mg/kg	milligrams per kilogram
µg/l	micrograms per liter

RSL	Regional Screening Level
SMP	Site Management Plan
SSL	Risk-Based Soil Screening Level
SSSL	Site-Specific Soil Screening Level
SVOCs	Semi-volatile Organic Compounds
VOCs	Volatile Organic Compounds
Wood	Wood Environment & Infrastructure Solutions, Inc.

## EXECUTIVE SUMMARY

The property was developed in the 1980s and was leased by CCI (also known as Six States Distributing) beginning in 1982. The facility contains one 18,600 square foot building used for warehousing, parts distribution, and truck maintenance. The site is zoned for commercial use and future land use is not expected to change. The site is covered with asphalt and a building preventing infiltration through soils.

A Phase II ESA was completed at the Site in 2009. A total of nine borings were installed, and soil and/or groundwater samples were collected. In 2015, the Phase II ESA was reviewed and compared the results to updated standards. Samples collected during the Phase II ESA identified a concentration of a volatile organic compound (VOC) constituent (trichloroethene) and a semivolatile organic compound (SVOC) and Poly Aromatic Hydrocarbon (PAHs) constituent (pyrene) that exceeded the Environmental Protection Agency (EPA) Regional Screening Level (RSL) Maximum Contaminant Level (MCL) for groundwater.

The Site's soil analytical results were compared to the risk-based soil screening levels (SSLs) for groundwater protection using a Dilution Attenuation Factor (DAF) of 20. Soil samples collected from borings B-3 during the Phase II ESA exceeded the DAF20 risk-based SSL for a VOC constituent (naphthalene).

A Phase II ESA Addendum was completed in 2019, which included the installation of four borings and the collection of groundwater samples from the borings. Soil sampling was not part of the scope of work since soil contamination above the EPA RSL was not identified during the 2009 Phase II ESA. No concentrations of VOCs and SVOCs above the EPA RSLs were reported in groundwater samples during the 2019 sampling events. A concentration of arsenic was reported above the EPA RSL MCL in the groundwater sample; however, regional arsenic levels for groundwater are generally found to be elevated.

Upon issuing the corrective action complete with controls determination, the Utah Division of Waste Management and Radiation Control (DWMRC) requested that a Site Management Plan (SMP) be submitted for the planned long-term approach for managing of VOC and metal impacts to soil and groundwater at the Site. The Site Management Plan requires land use, groundwater, and future development or disturbances restrictions, infiltration prevention practices, and conduct annual Site inspections. Additionally, an Environmental Covenant (EC) will be required upon completion/approval of the Site Management Plan with Utah DWMRC. Following approval of the SMP from Utah DWMRC all on-site monitoring wells shall be abandoned (if any are known to exist).

## 1.0 INTRODUCTION

Wood Environment & Infrastructure Solutions, Inc. (Wood) was retained by the Illinois Tool Works Inc. (ITW) to complete a Site Management Plan (SMP) for the Six States Distributors, Orem facility ("Site") located at 833 North Industrial Park Road in Orem, Utah. The SMP presents the planned long-term approach for managing of volatile organic compounds (VOC), semi-VOC (SVOC), and metal impacts to soil and/or groundwater at the Site. The SMP has been developed as requested by the corrective action complete with controls approval letter for the Site.

## 2.0 SITE DESCRIPTION AND MAPS

The Site is located at 833 North Industrial Park Road, Orem, Utah (**Figure 1**). The approximate geographic coordinates for the Site are Latitude North 40 degrees, 18 minute, and 44.86 seconds and Longitude West -111 degrees, 43 minutes, and 43.92 seconds located in Section 9 in Township 6 South, Range 2 East. The property was developed in the 1980s and was leased by CCI (also known as Six States Distributing) beginning in 1982. The facility contains one 18,600 square foot building used for warehousing, parts distribution, and truck maintenance. The exterior area of the property has asphalt surfacing. The Site consist of one tax parcel comprising of approximately 1.40 acres:

<u>Tax Parcels</u>	<u>Street Address</u>	<u>Acreage</u>
530020023	833 N. Industrial Park RD	1.402
<b>Total acreage</b>		<b>1.402</b>

The Site is bound to the east by Industrial Park Road and to the south by Highway 52. Commercial buildings bound the site to the north and west. The Site and surrounding area are shown on **Figure 2**.

### 2.1 SITE HISTORY

MACTEC Engineering and Consulting, Inc. (MACTEC) completed a Phase II ESA in 2009 (MACTEC, 2009) to investigate the potential for releases and subsurface impacts associated with historical operations as a maintenance facility, including the use of oils, lubricants, solvents, paints, and cleaning related chemicals. In 2015, Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec 2015) reviewed the Phase II ESA and resubmitted the results compared to updated standards. The Phase II ESA identified two parts washers and two solvent parts cleaners located inside the building. Dry sumps were located in the service area of the building. Staining was also observed on the concrete floor inside the building in the service area, near one of the parts washers, and in the vicinity of the outside parts storage areas. A 500-gallon used oil aboveground storage tank (AST) was located on the south side of the building; a dry sump was located near the AST. An outside tote storage area was located near the southwest corner of the building. Used parts are stored in areas to the south of the building. A drum storage area was located on the southeastern portion of the property. A storm water retention pond was located on the southwestern portion of the property.

Nine boring locations B-1 through B-8 and B-10 were installed and soil and/or groundwater samples were collected. Findings of the 2015 Phase II ESA identified no EPA RSL or Utah Initial

Screening Levels (ISL) exceedances in collected soil samples except for soil sample collected from B-3. Soil samples collected from borings B-3 at a depth of 6 feet exceeded the DAF20 risk-based SSL for a VOC constituent of naphthalene.

Groundwater samples collected from B-1, B-3 and B-4 had concentrations of trichloroethene, a VOC constituent that exceeded the EPA RSL Maximum Contaminant Level (MCL) and B-3 had a concentration of pyrene, a SVOC constituent that exceeded the EPA RSL MCL.

After the sale of the facility in 2013, ITW agreed to obtain a No Further Action (NFA) letter for the facility based on the 2009 report. The facility was entered into the Corrective Action Program of the Utah Division of Waste Management and Radiation Control (DWMRC). Due to the extended period of time that had elapse from the last sampling event in 2009 and the limited analytical methods analyzed, additional sampling and analysis of groundwater was requested by the DWMRC.

Wood completed a Phase II ESA Addendum in 2019 to address areas of concern identified during the Phase II ESA from 2009 (Wood 2019). Four direct-push Geoprobe® borings, B-13 through B-16, were advanced on-site to collect groundwater samples. Boring locations are included on **Figure 2**. Borings B-13 through B-16 were installed near B-1, B-3, B-4 and downgradient of B-3 and B-4. Groundwater concentrations of VOCs, SVOCs and RCRA 8 Dissolved Metal were below the EPA RSL MCL except for a concentration of arsenic that exceeded the MCL at 10.1 microgram/liter (µg/l) in groundwater sample collected from B-14.

### **3.0 RISK ASSESSMENT AND SITE-SPECIFIC SCREENING LEVELS**

Based on site characteristics, a Human Health Risk Assessment was not required for the Site per the Utah DWMRC.

#### **3.1 REGULATORY STANDARD EXCEEDANCES**

Soil VOC concentration that exceeded the Risk-Based SSLs for direct exposure and DAF 20 SSL for protection of groundwater standard is listed below.

- Naphthalene concentration of 0.135 mg/kg in samples B-3.

Historical groundwater contaminant concentrations including VOC and semi-VOCs (SVOCs) including PAHs that exceeded the EPA RSL MCL standards are listed below. In addition, current groundwater contaminant concentration of arsenic that exceeded the EPA RSL MCL standard is listed below. Groundwater analytical exceedance of the EPA RSLs is shown on **Figure 2**.

- Trichloroethene concentrations ranged from 1.0 to 1.25 mg/l in samples B-1, B-3, and B-4.
- Pyrene concentration of 1.07 mg/l in sample B-3.
- Arsenic concentration of 10.1 µg/l in sample B-14.

The Site is zoned for industrial/commercial use and Site use is not expected to change. The Site is currently paved with asphalt and constitutes a permanent cap of the impacted soils. Analysis of the groundwater samples collected from B-1, B-3, and B-4 were collected during the 2009 Phase II ESA sampling. During the 2019 Phase II ESA addendum, additional borings were installed in the general vicinity of previously installed boring B-1, B-3, and B-4 to verify current contaminant

concentrations. The groundwater samples collected from the 2009 borings detected trichloroethane and pyrene concentrations above the EPA RSL. The groundwater samples collected from the 2019 borings had reported concentrations of VOC, SVOC and metal contaminants above the laboratory MDL but below the EPA RSL MCLs. However, arsenic was detected in the groundwater sample from boring (B-14) above the EPA RSL MCL. The elevated levels of arsenic in groundwater appear to coincide with regional groundwater arsenic levels and is not a result of previous site use. In addition, the reported metals could have been a result of a high turbidity in groundwater during sample collection following boring installation activities and sampling activities.

The risk of the soil and water at the Site is greater than the exposure limit as defined in R315-101-1(b)(2) and (3) and a risk-based closure is not possible, and a deed restriction is required. Based on the analytical results the Site does not require corrective action and the soil and groundwater qualifies for regulatory closure status of "corrective action complete with controls".

#### **4.0 SITE MANAGEMENT**

The Site shall implement the following management requirements within the Site pursuant to the Utah Code R315-101-6.

##### **4.1 INSTITUTIONAL CONTROLS**

Based on the VOC, SVOCs and metal concentrations detected in soil and groundwater at the Site that exceeded the DAF 20 SSL for protection of groundwater and/or RSLs for direct exposure, and as part of the corrective action at the Site, the "Owner", Jodel Investments, LLC., 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 Utah County Recorder's office.

##### **4.2 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.

##### **4.3 SITE FACILITY RESTRICTIONS**

The following restrictions apply to the Site property:

###### **4.3.1 Land Use Restrictions**

The land use at the Site 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 Site are prohibited uses. Uses that would expose children to contaminants at the Site for extended periods of time (such as day care and school facilities) are prohibited.

Future Development or Disturbances – If activities are undertaken that access or disturb soils or groundwater under the Site (below building foundations, parking areas, roads, etc.), onsite

workers and/or construction works may be exposed to VOC, SVOC and metal contaminated soils or groundwater and the Site owner shall insure that steps are taken to prevent worker exposure to contamination. This includes any dewatering of the aquifer. Site soils may not be removed from the site. However, if site soils must be removed, generated soil must be characterized using laboratory analytical methods and the soil must be properly transported and disposed of at appropriate landfills based on analytical results. Management and disposal of impacted media from the Site must be consistent with all pertinent federal and state environmental laws.

Property Wide Groundwater Use Limitations – With the exception of environmental sampling, groundwater will not be accessed by wells, pits, sumps or other means for any use or purpose including bathing or drinking. If dewatering of excavations at the site are required, then the water should be treated offsite at a proper disposal facility and not discharged to ground surface.

Infiltration Prevention – The owner of the Site shall maintain the cap materials (parking lot/roads and building floors) within their respective portion of the Site to minimize infiltration as described in Section 4.4.

Well Abandonment – The groundwater monitoring wells shall be abandoned following the regulations as outlined in the State of Utah Well Handbook, Section R655-4-12 upon approval of the SMP.

#### **4.4 INFILTRATION PREVENTION**

First, the parking lot/roads and building floors onsite will be maintained in good condition. If at any time during a site inspection and/or general working hours significant cracks are observed in the cap materials, the observed crack(s) must be appropriately sealed to prevent water infiltration. If replacement of one of the impervious surfaces (such as asphalt) is required, then it should be done in a timely manner to minimize the potential for infiltration. Second, before any changes to configuration of the parking lot/roads or building floors are made, the Owner of the affected portion of the of the Site will first develop a work plan to notify and limit any onsite workers and/or construction workers that may be exposed to VOC, SVOC, and metal contaminated soil and/or groundwater, and the Site shall insure that steps are taken to prevent worker exposure to contamination. Notwithstanding the foregoing, routine and temporary asphalt parking lot/roads disturbances, shall not require a work plan. Reconfiguration of the parking lot or building floors on the Site must not increase the potential for infiltration into groundwater beyond the current land use.

#### **4.5 SITE INSPECTIONS**

The Owner of the Site shall conduct an annual visual inspection of the cap material (asphalt parking lot/roads and concrete building floors) on March 1<sup>st</sup> of each year. The resulting inspection report shall be submitted to the Utah DQMRC within 30 days of completing the inspection. These inspections would need to be completed to ensure the cap is in good condition.

#### **4.6 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 Salt Lake County Recorder's Office.



## 4.7 CONCLUSION

Based on historical property usage and previously completed assessment, the following conclusions are presented:

- The Site is zoned for commercial use and future land use is not expected to change. The Site is covered by with asphalt hard surfaces and building preventing infiltration through soils.
- Previously collected samples during the 2009 Phase II ESA identified a contaminant concentration of VOC in soil that exceeded the DAF20 SSL for protection of groundwater for direct exposure and contaminant concentrations of VOC and SVOC including PAHs in groundwater that exceeded the EPA RSL MCLs.
- Collected samples during the 2019 Phase II ESA Addendum identified contaminant concentration of arsenic in groundwater above EPA RSL MCL. No concentrations of VOCs and SVOCs were reported in groundwater samples above the EPA RSL MCLs.
- Based on the current groundwater analytical results, contamination concentrations are stable and are not increasing.
- The Site Management Plan presents the planned long-term approach for managing of volatile organic compounds (VOC) impacts to soil and metal impacts to groundwater at the Site.
- The Site Management Plan and the Environmental Covenant require that the Site has land use, groundwater and future development or disturbances restrictions, infiltration prevention practices, and conduct annual site inspections.
- Following approval of the SMP from Utah DWMRC all on-site monitoring wells shall be abandoned.

## 5.0 LIMITATIONS OF STUDY

This report has been prepared in accordance with generally accepted environmental, hydrogeological, and related practices. No other warranty, express or implied, is made to the professional advice and recommendations included herein. This report has not been prepared for parties other than listed in this report.

If there is a substantial lapse of time between the submission of this report and the start of future tasks at the Site, an environmental professional should review this report to determine the applicability of the analyses and recommendations considering the potential changed conditions and time lapse.

The stratigraphy reported is general in nature based on widely spaced probe holes and/or sporadic sampling intervals. The material types reported may vary between and outside the area of recovered samples. Groundwater information is also general in nature based on widely spaced wells and differing well intake intervals. It should be noted that fluctuations in the groundwater

level occur due to seasonal variations and other considerations that may not be evident at the times the measurements/evaluations were made.

## 6.0 REFERENCES

MACTEC Engineering and Consulting, Inc. (MACTEC), 2009. Limited Phase II Environmental Site Assessment, 2009.

Amec Foster Wheeler (Amec), 2015. Limited Phase II Environmental Site Assessment, 2015.

Wood plc (Wood), 2019. Limited Phase II Environmental Site Assessment Addendum, 2019.

## 7.0 SIGNATURES

This report was prepared by **Wood Environment & Infrastructure Solutions, Inc.**

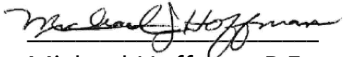
Written By:



Date: 3/28/22

Corey N. Buchanan, P.G.  
Staff Scientist

Reviewed By:



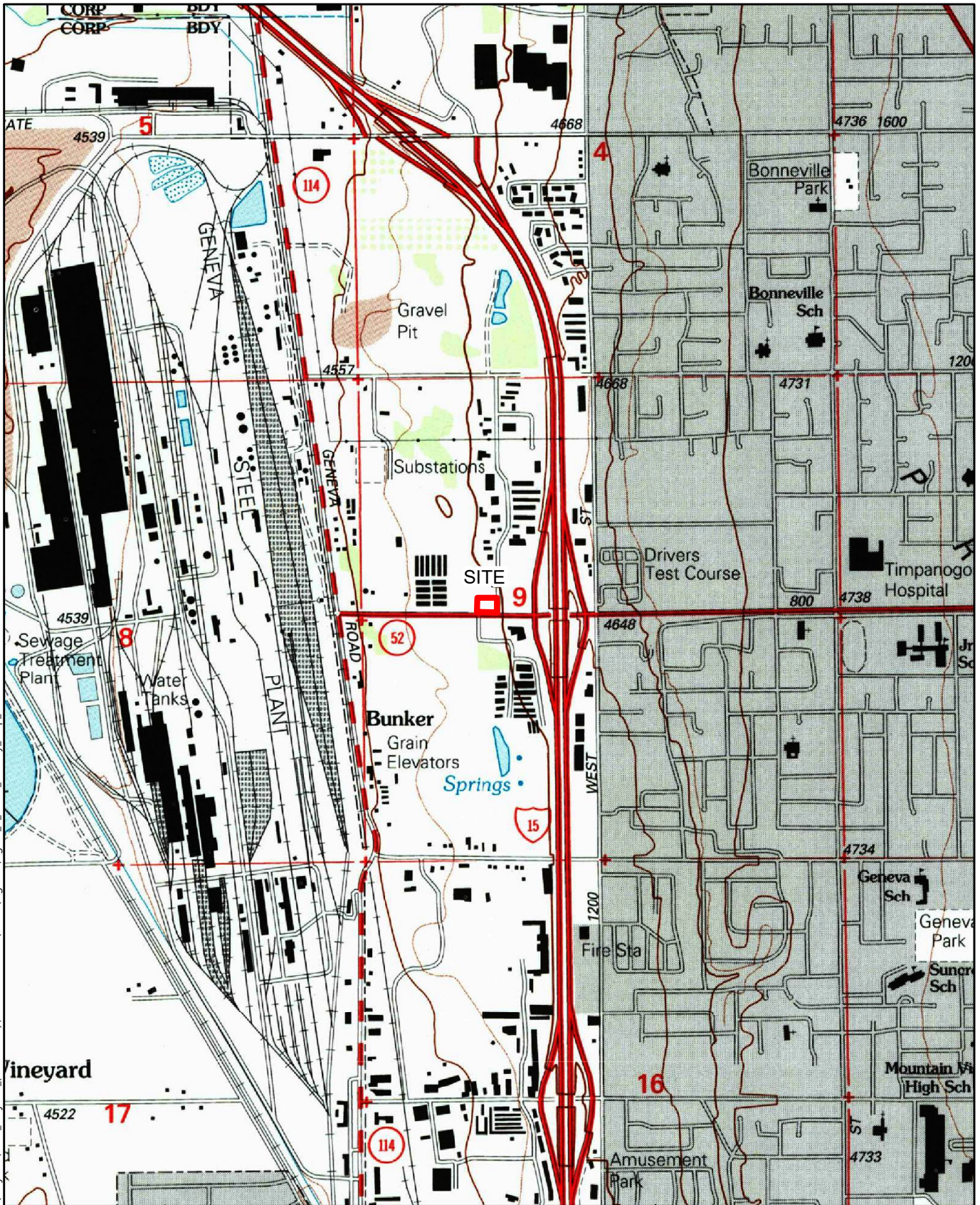
Date: 3/28/22

Michael Hoffman, P.E.  
Associate Project Manager

## Figures

---

Document Path: P:\Environmental\Projects\2021\Projects (0493-xxxx)\3160201023 CCI\Orem\Figures\Figure\_1\_Orem\_Vicinity\_Map\_09-27-21.mxd



<b>Legend</b> Site Boundary  SOURCE: USGS 7.5 Minute Quad Orem, UT 1998  Township 6 South, Range 2 East, Section 9	N   SCALE: 1 inch = 1,500 feet DATE: 09/27/21 PROJECT NO: 3160201023 DATUM/PROJECTION: NAD 83 UTM 12 DWN BY: CNB    CHK'D BY: BTM	CLIENT Illinois Tool Works Inc. 155 Harlem Avenue Glenview, IL 60025	PROJECT Six States Distributors 841 North Industrial Park Drive Orem, Utah 84057
		Wood Environment & Infrastructure Solutions, Inc. 10876 South River Front Parkway, Suite 250 South Jordan, Utah 84095 Telephone: (801) 999-2002	TITLE Vicinity Map

Document Path: P:\Environmental\Projects\2021\_Projects\_(0493-xxxx)\3160201023\_CCI\Orem\Figures\Figure\_2\_Orem\_Sample\_Locations\_02-14-19.mxd



Industrial Park Drive

West 800 North

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

<b>Legend</b> Boring Locations 2019 Previous Boring Locations Site Boundary	 SCALE: 1 inch = 42 feet DATE: 09/27/21 PROJECT NO: 3160201023 DATUM/PROJECTION: NAD 83 UTM 12 DWN BY: CNB CHK'D BY: BTM	CLIENT Illinois Tol Works Inc. 155 Harlem Avenue Glenview, IL 60025	PROJECT Six States Distributors 841 North Industrial Park Drive Orem, Utah 84057
		Wood Environment & Infrastructure Solutions, Inc. 10876 South River Front Parkway, Suite 250 South Jordan, Utah 84095 Telephone: (801) 999-2002	TITLE Sample Locations and RSL Exceedances