

# Site Management Plan

**Former Ace Auto  
47 East 700 South  
Salt Lake City, Utah**

September 15, 2022 Revised November 22, 2022  
Terracon Project No. 61227303



**Prepared for:**  
700 Flatirons, LLC

**Prepared by:**  
Terracon Consultants, Inc.  
Midvale, Utah

[terracon.com](http://terracon.com)

**Terracon**

Environmental



Facilities



Geotechnical



Materials



September 15, 2022 Revised November 22, 2022

700 Flatirons, LLC  
c/o Mr. Alexander F. Paul and Mr. Gary Poole  
5025 Pearl Parkway  
Boulder, Colorado 80301

Re: **Site Management Plan**  
Former Ace Auto  
47 East 700 South  
Terracon Project No. 61227303

Dear Mr. Paul and Mr. Poole:

Terracon has prepared this Site Management Plan for the Former Ace Auto site located in Salt Lake City, Utah. A Site Management Plan is required in order to meet the requirements of the Environmental Cleanup Program under the Utah Department of Environmental Quality (UDEQ) Division of Waste Management and Radiation Control (DWMRC) as impacts exceeding unrestricted land use screening levels remain on the site post remedial action.

Should you have any questions or require additional information, please do not hesitate to contact our office.

Sincerely,

**Terracon Consultants, Inc.**

Andrew Turner  
Project Manager

Amy Austin  
Authorized Project Reviewer

Terracon Consultants Inc. 6949 South High Tech Drive Midvale, Utah 84047

P [801] 545-8500 F [801] 545-8600 terracon.com

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**Site Management Plan**

Ace Auto Site ■ Salt Lake City, Utah

November 22, 2022 ■ Terracon Project No. 61227303



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## **1.0 INTRODUCTION**

A remedial action was completed for the Ace Auto Site, located in Salt Lake City, Utah, through the Environmental Cleanup Program under the Utah Department of Environmental Quality (UDEQ) Division of Waste Management and Radiation Control (DWMRC). The purpose of this Site Management Plan (SMP) is to maintain the protectiveness of the remedial action as impacted soil and groundwater remain at the site above unrestricted land use action levels. An Environmental Covenant (EC) will also be prepared and will be recorded on the Title to the Property and implemented by the Property Owner (Owner).

### **1.1 Site History**

The former Ace Auto Site (site) consists of 0.48 acres of land at 47 East 700 South in Salt Lake City (**Appendix A, Exhibits 1 and 2**). The building is approximately 13,000 square feet in size, constructed of masonry block walls and slab on grade concrete floors. The building extends to the property boundary lines on the north, south, and east side of the lot. Pavement bounds the building on the west side to the property lines. Adjacent properties consist of commercial properties on the east and west sides that have structures, 700 South Street to the south and a paved parking lot to the north.

The former Ace Auto facility performed chrome plating activities. A release originating from the operation was identified and reported to the UDEQ Division of Environmental Response and Remediation (DERR) after an initial investigation in 2011. As impacts in the form of hexavalent chromium were identified at the site, the site was subsequently enrolled in the Environmental Cleanup Program under the DWMRC by the Owner.

A Remedial Action Plan (RAP) for the site was developed by Terracon and approved by DWMRC on May 13, 2020. The objectives of the RAP were to remove/stabilize the main contaminant of concern, hexavalent chromium, by:

- (i) Controlling the source of chromium impacts to groundwater via polysulfide addition to convert hexavalent chromium to less toxic and less mobile trivalent chromium;
- (ii) Controlling exposure pathways for soil with elevated chromium levels;
- (iii) Facilitating site redevelopment through a combination of engineering and institutional controls coordinated under a Site Management Plan;
- (iv) Facilitating conditional closure of the site after chromium levels are verified to be stable.

## 1.2 Remedial Action

A Remedial Action Implementation Report (dated November 4, 2021) was prepared by Terracon to document the completion of the RAP activities and achievement of the goal of controlling the source of hexavalent chromium impacts to groundwater.

Source soils in the former plating operation areas inside the facility were removed as part of the scope of work. The Remedial Action Implementation Report documented that the extent of practicable excavation left impacted soils exceeding regulatory screening levels in-place; soil samples collected at the extent of excavations reported elevated concentrations of mercury and hexavalent chromium remain in soils beneath the building. Impacted soil likely remains below the building to the east and between the excavation of the sump area and the plating room area under the interior bearing wall, where excavation could not be performed (**Appendix A, Exhibit 3**). Groundwater monitoring post corrective action reported elevated concentrations of dissolved metals to remain in groundwater beneath the site and VOCs present above vapor intrusion screening levels.

As impacted soils and groundwater remain on the site after remedial actions, a Risk Assessment (Terracon; *September 16, 2022 Revised November 1, 2022*) was performed to evaluate the risks associated with the concentrations of chemicals of interest (COI) left in-place. The Risk Assessment determined that concentrations of COIs remain in soils and groundwater at the site above EPA risk screening levels and present a risk to future residential or commercial receptors at the site. However, exposure pathways are incomplete. As long as the site is covered by concrete and/or asphalt, the current on-site groundwater monitoring wells are properly abandoned, groundwater is not accessed, and there is no exposure pathway, these risks can be properly mitigated. The impacts remaining in the soil appear to be isolated and confined to small, inaccessible areas in one location under the current walls and building. Therefore, a Site Management Plan and Environmental Covenant are required to ensure the exposure pathways remain incomplete.

## 2.0 SITE MANAGEMENT

The following sections discuss specific details and procedures related to the Activity and Use Limitations and Engineering and Institutional Controls imposed upon the Property through the recorded EC. The SMP will be implemented by the Owner. The SMP may be amended with approval of the DWMRC.

### 2.1 Environmental Covenant

Terracon will work with DWMRC to prepare an Environmental Covenant that outlines the continuing obligations and limitations associated with impacts remaining at the site. The Environmental Covenant will be recorded on the Property's title.

## **2.2 Activity and Use Limitations**

The following land use limitations are imposed upon the site:

1. Land use will remain commercial. Residential land use is currently prohibited at the site unless and until owners request a change in land use with DWMRC.
2. Groundwater will not be accessed for drinking water, irrigation, or bathing purposes.
3. No excavation or demolition (only improvements) is allowed on the site. Such prohibited work includes building demolition, trenching, removal of internal or external walls, new construction that requires soil disturbance, and significant and permanent asphalt/concrete cover removal. In the event additional occupied buildings are constructed on the site and/or the current building is demolished (i.e., during redevelopment), the requirements for mitigation will need to be re-evaluated and discussed with and approved by DWMRC. The Risk Evaluation discussed the possible risks associated with different scenarios including indoor and outdoor worker and construction worker. These scenarios will need to be addressed prior to any demolition or excavation conducted at the site.
4. The Owner will contact DWMRC if construction activities and/or other unforeseen events or disturbances may result in disturbances to impacted soil. This may require the Owner to submit a work plan for approval by the DWMRC (per discussion with the agency) to assess risks to human health and the environment and to properly manage the excavated materials. The mitigation plan shall include construction worker notification and safety measures and appropriate soil waste characterization and disposal requirements, if required.

## **2.3 Engineering Controls**

The remedy to prevent exposure to impacted soils will be to maintain a hardscape surface over the site to prevent contact with the soils. Such hardscape surfaces include the current building footprint and concrete or asphalt surface covering the entire site.

As COIs remain in soils at the site above unrestricted land use regulatory screening levels, any excavation of soils, building demolition or redesign, or change in land use anywhere on the site may require that a work plan be submitted to DWMRC for review and approval prior to implementing work at the site. Risks presented in the Risk Evaluation will need to be addressed and mitigated.

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### 2.4 Worker Health and Safety Requirements

The Owner shall inform any workers conducting construction, excavation, and/or subslab or subgrade work on the Site of the presence potential soil impacts that could be encountered at the property boundary. As appropriate, contractors that could come into contact with soil impacts should prepare their own Health and Safety Plan that specifically addresses potential contaminants that could be encountered and personal protective equipment (PPE) that is required. It will be the contractor's responsibility to ensure worker protection meets the Occupational Safety and Health Administration's (OSHA's) requirements.

### 2.5 Contingency Plan

If unforeseen events or unexpected contamination are encountered at the site during any work, DWMRC will be notified and a contingency plan will be developed in consultation with DWMRC to address the situation.

### 2.6 Notification

The Owner shall notify DWMRC either by phone at (801) 536-0200 or in writing at the address noted below of any excavation or demolition activities being planned for the site. In addition to the SMP requirements, site activities must comply with appropriate permitting authorities.

Brad Lauchnor P.E, P.G.  
Division of Waste Management and Radiation Control  
Utah Department of Environmental Quality  
P.O. Box 144840  
Salt Lake City, Utah 84114-4840  
(801) 536-0200

## Site Management Plan

Ace Auto Site ■ Salt Lake City, Utah

November 22, 2022 ■ Terracon Project No. 61227303



### 3.0 REFERENCES

Limited Site Investigation / Amended Remedial Action Plan, Ace Automotive, 47 East 700 South, Salt Lake City, Utah, Terracon Project Number 61207093, May 4, 2020.

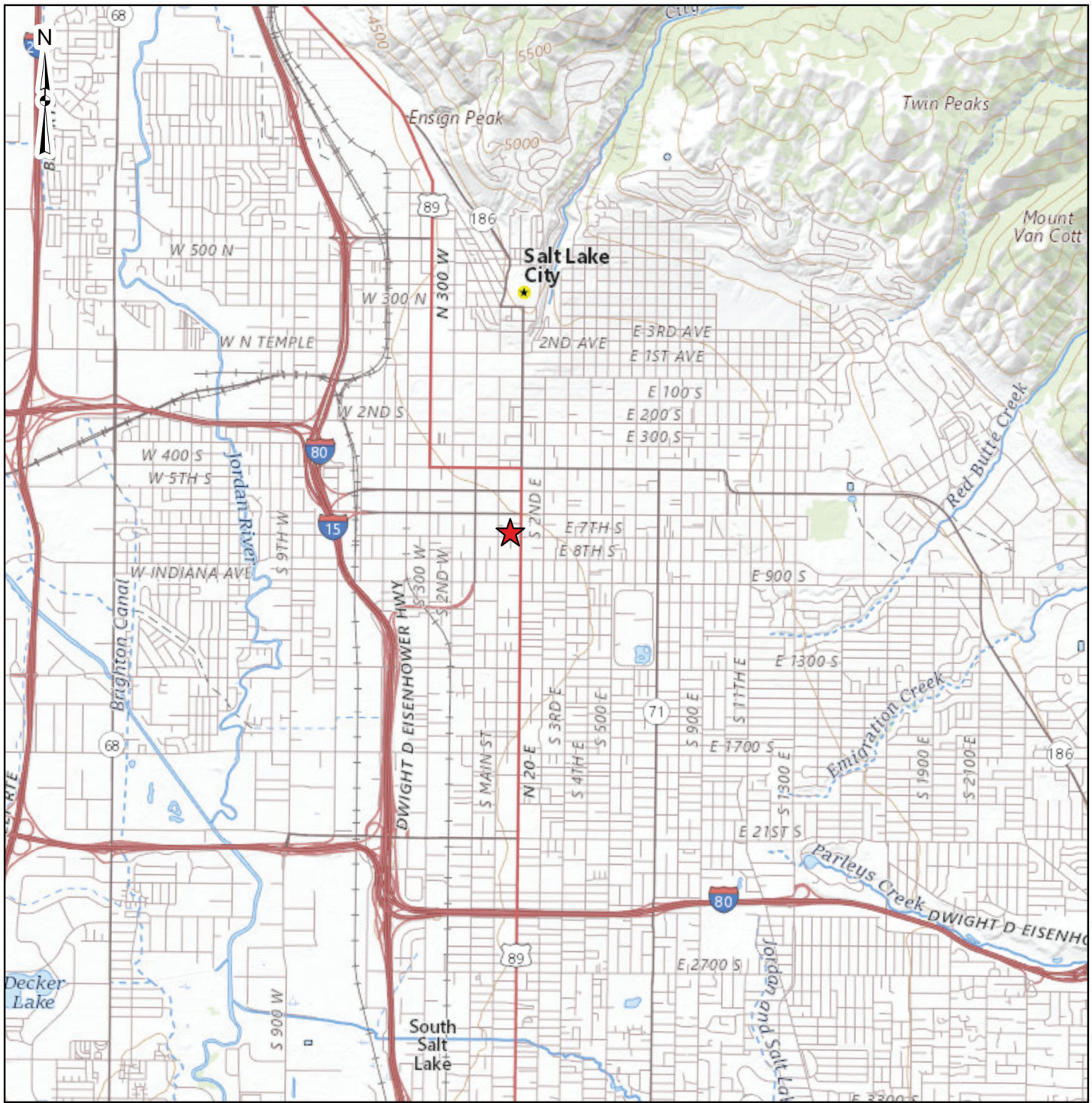
Remedial Action Plan Amendment, Ace Automotive, 47 East 700 South, Salt Lake City, Utah, Terracon Project Number 61207093, April 15, 2020.

Terracon Consultants, Inc. *Remedial Action Implementation Report, Former Ace Auto, 47 East 700 South, Salt Lake City, Utah*, November 4, 2021.

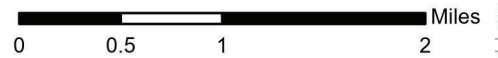


## **Appendix A**

Exhibits



★ Approximate Site Location



DATA SOURCES:  
ESRI WMS - World Aerial Imagery, OpenStreetMap

Project No.:  
61207235  
Date:  
Aug 2021  
Drawn By:  
NOW  
Reviewed By:  
JRG



6949 S High Tech Dr, Ste 100 Midvale, UT 84047  
PH. (801) 545-8500 terracon.com

**Topographic Map**

Former Ace Auto  
47 East 700 South  
Salt Lake City, Utah

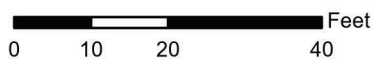
**Exhibit**

**1**





- Excavation Area
- Trench/Infiltration Gallery
- Bearing Wall
- ⊕ Monitoring Wells
- Injection Vault
- ▭ Site Boundary



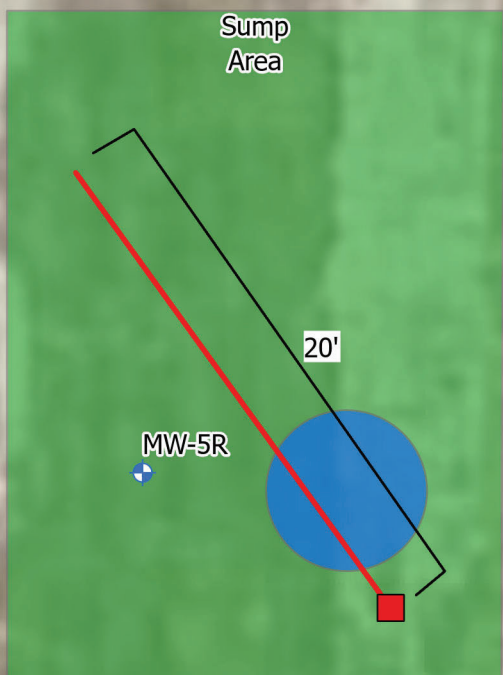
DATA SOURCES:  
ESRI WMS - World Aerial Imagery, OpenStreetMap

Project No.:	61207235
Date:	Aug 2021
Drawn By:	AST
Reviewed By:	BBB

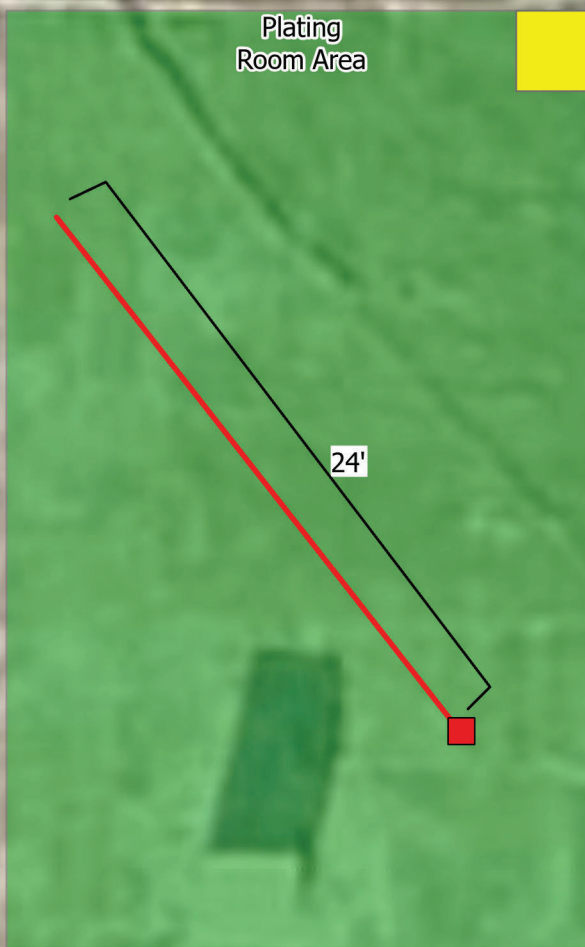
6949 S High Tech Dr, Ste 100 Midvale, UT 84047  
PH. (801) 545-8500 terracon.com

<b>Site Diagram</b>
Former Ace Auto 47 East 700 South Salt Lake City, Utah

<b>Exhibit</b>
<b>2</b>

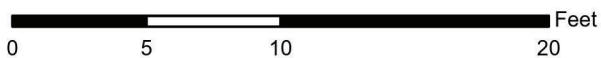


Sump Area: 25 ft x 22 ft x 9 ft depth



Plating Room Area: 35 ft x 18.5 ft x 9 ft depth

- Monitoring Wells
- Excavation Area
- Bearing Wall
- Trench/Infiltration Gallery
- Injection Vault
- Former Sump
- Unexcavated Area
- Site Boundary



DATA SOURCES:  
ESRI WMS - World Aerial Imagery, OpenStreetMap

Project No.:	61207093
Date:	Aug 2021
Drawn By:	AST
Reviewed By:	BBB



6949 S High Tech Dr, Ste 100 Midvale, UT 84047  
PH. (801) 545-8500 terracon.com

Excavation Limits
Former Ace Auto 47 East 700 South Salt Lake City, Utah

Exhibit
3

## **Appendix B**

Corrective Action Complete with Controls Determination





State of Utah

SPENCER J. COX  
*Governor*

DEIDRE HENDERSON  
*Lieutenant Governor*

Department of  
Environmental Quality

Kimberly D. Shelley  
*Executive Director*

DIVISION OF WASTE MANAGEMENT  
AND RADIATION CONTROL

Douglas J. Hansen  
*Director*

July 14, 2022

Third River Real Estate  
c/o Mr. Michael Brenny  
4701 North Stonehaven Loop  
Lehi, UT 84043

RE: Corrective Action Complete with Controls Designation  
Former Ace Automotive, 47 East 700 South, Salt Lake City, Utah.  
UTCA0027

Dear Mr. Brenny:

The Division of Waste Management and Radiation Control (Division) has completed its review of your June 16, 2022, submittal of the Proposed Land Use for the Former Ace Automotive property located at the address listed above.

The Division has determined the facility now meets the Corrective Action Complete with Controls designation for the proposed commercial/industrial use at the property. Please prepare and submit to the Division for review a draft Site Management Plan and Environmental Covenant for the site.

If you have any questions, please call Brad Lauchnor at (801) 536-0254.

Sincerely,

Douglas J. Hansen, Director

Division of Waste Management and Radiation Control

DJH/BML/kd

c: Angela C. Dunn, MD, MPH, Health Officer, Salt Lake County Health Dept.  
Dorothy Adams, Deputy Director, Salt Lake County Health Dept.  
Ron Lund, Environmental Health Director, Salt Lake County Health Dept.  
Michael Brenny, Third River Real Estate (Email)  
Andrew Turner, Terracon (Email)

DSHW-2022-018141

195 North 1950 West • Salt Lake City, UT  
Mailing Address: P.O. Box 144880 • Salt Lake City, UT 84114-4880  
Telephone (801) 536-0200 • Fax (801) 536-0222 • T.D.D. (801) 536-4284  
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