

**FINAL SITE MANAGEMENT PLAN
THE HUXLEY
74 SOUTH 600 WEST
SALT LAKE CITY, UTAH 84101**

Project No. 1659-281D

To:

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TABLE OF CONTENTS

<u>Section</u>	<u>Page No.</u>
1. INTRODUCTION.....	1
1.1 Site Description	1
1.2 Site Background.....	2
2. SITE MANAGEMENT	4
2.1 Activity and Use Limitations	4
2.1.1 Site Management Plan	4
2.1.2 Land Use Limitations	4
2.1.3 Groundwater Limitations	4
2.1.4 Disturbance Limitations	5
2.1.5 Construction Dewatering Limitations	5
2.1.6 Vapor Intrusion Limitations	5
2.2 Long-term Groundwater Monitoring	5
2.3 Maintenance, Access, and Inspections	5
2.3.1 Notice.....	5
2.4 Environmental Covenant.....	6
2.5 Site Management Contacts.....	6

Exhibit

Exhibit A – Vicinity Map and Parcel 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 volatile organic compound (VOC) impacts to groundwater at The Huxley facility, (Facility) located at 74 South 600 West in Salt Lake City, 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, groundwater limitations, construction limitations, and disturbance limitations.

1.1 Site Description

The Facility is 1.09 acres (Tax Parcel Numbers: 15-01-104-003, 15-01-104-005, 15-01-104-006, 15-01-104-007, and 15-01-104-008) located at 74 South 600 West in Salt Lake City, Salt Lake County, Utah (as shown in Exhibit A, Figure 1 and Figure 2). The legal descriptions for the Facility are:

NORTHWEST QUARTER of SECTION 1, T1S, R1W, SLB&M

15-01-104-003:

Beginning at the southwest corner of Lot 1, Block 49, Plat "C", Salt Lake City Survey; and running thence north 6 rods 10 feet; thence east 3 rods; thence south 6 rods 10 feet; thence 3 rods to the point of beginning.

15-01-104-005:

Beginning at a point 40 feet south from the northeast corner of Lot 1, Block 49, Plat "C", Salt Lake City Survey; and running thence south 40 feet; thence west 165 feet; thence north 40 feet; thence east 165 feet to the place of beginning.

15-01-104-006:

Beginning at a point 80 feet south of the northeast corner of Lot 1, Block 49, Plat "C", Salt Lake City Survey; and running thence west 100 feet; thence south 63 feet; thence east 100 feet; thence north 63 feet to the point of the beginning.

15-01-104-007:

Beginning at a point 123 feet north from the southeast corner of Lot 1, Block 49, Plat "C" in Salt Lake City Survey; and running thence north 64 feet; thence west 100 feet; thence south 64 feet; thence east 100 feet to the point of the beginning.

15-01-104-008:

Beginning at the southeast corner of Lot 1, Block 49, Pat "C", Salt Lake City Survey; and running thence north 123 feet; thence west 100 feet; thence north 127 feet; thence west 65 feet; thence south 141 feet; thence east 49.5 feet; thence south 109 feet; thence east 115.5 feet to the point of the beginning.

1.2 Site Background

Under the regulatory oversight of the Utah Department of Environmental Quality, Division of Waste Management and Radiation Control (DWMRC), an environmental response project, as defined at Section 57-25-102(5) of the Utah Code Annotated, approved by the DWMRC for the Facility, has been undertaken to address VOC-impacted groundwater at the Facility.

Wasatch prepared a December 9, 2022, Phase I Environmental Site Assessment on behalf of Wells Fargo Bank, N.A. During the completion of the December 2022 Phase I Environmental Site Assessment, Wasatch identified the following recognized environmental conditions in connection with the Facility:

- The former commercial building located in the southeastern portion of the Facility operated as Custom Polish & Plating, a metal-plating business. Based on date of construction and historical city directories, this business may have operated since at least 1987 until 2008. It is our experience that releases from metal-plating businesses are common, which represents a recognized environmental condition.
- Based on groundwater analytical results from a monitoring well located immediately east of the Facility associated with The Beverly, the likely presence of tetrachloroethene (PCE) impacts in groundwater at the Facility associated with releases from the east adjoining and hydraulically upgradient The Beverly facility represents a recognized environmental condition.

To evaluate the recognized environmental conditions at the Facility, on January 11, 2023, Wasatch supervised the completion of seven soil borings (GP1 through GP-7) and the collection of two subsurface soil gas samples (SG-1 and SG-2) at the Facility. The objective of this investigation was to evaluate if soil and/or groundwater impacts are present at the Facility near the former metal-plating building, to evaluate the potential migration of PCE impacts in groundwater onto the Facility from the hydraulically upgradient adjoining property, and to evaluate the potential for vapor intrusion from the PCE plume for future residential development. Soil samples were analyzed for hexavalent chromium and the Resource Conservation and Recovery Act (RCRA) D-List Metals. Groundwater samples were analyzed for VOCs, dissolved RCRA D-List Metals, and hexavalent chromium. Soil gas samples were analyzed for VOCs.

The analytical results for soil indicated that arsenic was reported at concentrations that exceed both Residential and Commercial United States Environmental Protection Agency (U.S. EPA) Regional Screening Levels (RSLs); however, these arsenic levels are well within established background concentrations for the Salt Lake Valley and are not likely indicative of a release.

Hexavalent chromium was not detected in any of the soil samples at concentrations exceeding its U.S. EPA RSL for Residential Soil, and hexavalent chromium was not detected in any of the groundwater samples. Based on the analytical results, it does not appear that a release of hexavalent chromium from past metal plating activities had occurred at the Facility.

The groundwater analytical results indicated chlorinated solvents; namely PCE and its breakdown product cis-1,2-dichloroethene, are migrating on-site at concentrations that exceed U.S. EPA Maximum Contaminant Levels (MCLs) at concentrations ranging from 5.4 micrograms per liter ($\mu\text{g/L}$) to 15.1 $\mu\text{g/L}$. The soil gas analytical results indicated PCE is not currently present in the soil gas at concentrations exceeding its U.S. EPA Vapor Intrusion Screening Level (VISL) Residential Target Sub-Slab and Near-Source Soil Gas Concentration (TSSGC).

Benzene was detected in three groundwater samples collected along the eastern property boundary at concentrations exceeding its U.S. EPA MCL. Benzene has not been detected in the groundwater samples obtained from The Beverly, which suggested that the presence of benzene in groundwater is not associated with The Beverly, and may be from an unknown on-site or off-site source. Additionally, benzene was not detected in soil gas samples at concentrations exceeding its U.S. EPA U.S. EPA VISL Residential TSSGC.

Wasatch recommended additional investigation activities be conducted in order to further delineate the extent of benzene impacts at the Facility in these areas.

On March 1, 2023, Wasatch supervised the completion of five additional borings (GP-8 through GP-12) to further delineate the extent of benzene impacts to soil and groundwater at the Facility and collected three additional subsurface soil gas samples (SG-3 through SG-5) to evaluate the potential for vapor intrusion from the PCE plume and on-site benzene impacts for future residential development. Additionally, Wasatch reviewed historical property tax assessor records to evaluate if any heating oil tanks were present in the former residences at the Facility which could be a potential source of the benzene impacts. Soil and groundwater samples were collected from each soil boring and analyzed for VOCs. Subsurface soil gas samples were also analyzed for VOCs.

On March 2, 2023, we obtained historical property tax assessor information for the former residences located along the northeast portions of the Facility from the Salt Lake County Archives. The tax assessor information documents that a duplex (formerly addressed at 46 and 48 South 600 West) was previously located in the northeast corner of the Facility. The two residences were listed as heated by a stove in 1936; however, one of the residences is identified as heated by a heating oil tank in 1956. The tax assessor information documents that by 1962, both residences in the former duplex were listed as heated by natural gas.

The analytical results for soil indicated that no VOCs were detected at concentrations exceeding their respective U.S. EPA RSLs for Residential Soil. Benzene was not detected in any of the soil samples collected.

The groundwater analytical results identified PCE ranging from 1.3 µg/L to 26.9 µg/L, indicating that PCE is migrating on-site at concentrations that exceed U.S. EPA MCLs. The soil gas analytical results indicate PCE is not currently present in the soil gas at concentrations that would warrant a vapor barrier beneath future residential development in the areas sampled.

Benzene was detected in four groundwater samples collected at concentrations exceeding its U.S. EPA MCL, ranging from 5.5 µg/L to 12.8 µg/L. The extent of the benzene impacts to groundwater at concentrations exceeding its U.S. EPA MCL had not been defined to the north, west, or south on the Facility. Benzene was not detected in any of the soil gas samples during this investigation. Additionally, during our January 2023 investigation, benzene was not detected in any of the subsurface soil gas samples at concentrations exceeding its U.S. EPA VISL Residential TSSGC.

Consistent with the results from our previous January 2023 investigation, PCE impacted groundwater is migrating beneath the Facility from the east adjoining The Beverly property. Additionally, benzene impacted groundwater is present on the Facility. Information obtained from the tax assessor's office documented that one heating oil tank was present in the northeastern portion of the Facility.

On March 23, 2023, Wasatch supervised the completion of 10 additional soil borings (designated GP-13 through GP-22) at the Facility. The objective of this investigation was to further delineate the extent of benzene impacts in groundwater at the Facility. Additionally, to evaluate if the former heating oil tank could be the source of the petroleum hydrocarbon impacts at the Facility, soil and groundwater samples collected during this subsurface investigation were analyzed for semi-volatile organic compounds (SVOCs).

The analytical results for soil indicated that no VOCs or SVOCs were detected at concentrations exceeding their respective U.S. EPA RSLs for Residential Soil. Neither benzene, nor benzo(a)pyrene, were detected in any of the soil samples collected.

The groundwater analytical results indicate that PCE is migrating on-site at concentrations that exceed U.S. EPA MCLs. Although, the soil gas analytical results indicate PCE is not currently present in the soil gas at concentrations that would warrant a vapor barrier beneath future residential development in the areas sampled, a vapor barrier will be installed beneath any future ground floor residential unit

constructed on the Facility as a precautionary measure for future residential receptors and to eliminate the need for long-term groundwater monitoring at the Facility.

Benzene was detected at concentrations exceeding its U.S. EPA MCL in five of the groundwater samples collected; however, benzene was not detected in any of the soil gas samples collected during our prior investigations at concentrations exceeding its U.S. EPA VISL Residential TSSGC. Although, the soil gas analytical results indicate benzene is not currently present in the soil gas at concentrations that would warrant a vapor barrier beneath future residential development in the areas sampled, a vapor barrier will be installed beneath any future ground floor residential unit constructed on the Facility as a precautionary measure for future residential receptors and to eliminate the need for long-term groundwater monitoring at the Facility.

The impacts of benzene to groundwater appear to be ubiquitous across the Facility. The highest concentrations have been identified along the eastern and northern property boundaries, suggesting that benzene may be migrating onto the Facility from an off-site source. Additionally, based on groundwater analytical results for SVOCs, it does not appear that the former heating oil tank is the likely source of petroleum hydrocarbon impacts to groundwater.

Benzo(a)pyrene was detected in five of the groundwater samples collected at concentrations of 0.9 µg/L and 1.0 µg/L, exceeding its U.S. EPA MCL of 0.2 µg/L; however, it is Wasatch's experience that if groundwater samples were collected on the Facility from properly developed monitoring wells in the areas of the observed benzo(a)pyrene impacts, the concentrations in groundwater would likely decrease to below its U.S. EPA MCL.

Through this SMP and an Environmental Covenant (EC), including necessary activity and use limitations, the risk posed by benzene and PCE impacts to groundwater at the Facility will be mitigated. The management requirements of the SMP and activity and use limitations of the EC will be protective of human health and the environment.

2. SITE MANAGEMENT

2.1 Activity and Use Limitations

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

2.1.1 Site Management Plan

The Owner shall comply with this SMP.

2.1.2 Land Use Limitations

The Facility is suitable for residential, commercial and industrial use consistent with applicable local zoning laws; provided that residential land use and land use involving sensitive populations include the installation of a vapor barrier beneath the building(s). If future data demonstrate an acceptable level of exposure risk relative to the vapor intrusion pathway, future residential land use and land use involving sensitive populations without the installation of a vapor barrier may be permissible upon prior notification to, and approval by, the Director. Planting crops or fruit trees for consumption by humans or livestock is prohibited.

2.1.3 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 Facility shall be subject to review and approval by the Director prior to implementation.

2.1.4 Disturbance Limitations

Appropriate care shall be exercised during construction, remodeling, and maintenance activities related to human-occupied structures on the Facility so as to prevent damage to any vapor mitigation measures which have been installed, and to ensure appropriate repairs are promptly made in the event damage does occur.

2.1.5 Construction Dewatering Limitations

Dewatering conducted to facilitate construction on the Facility may require that the groundwater be treated to reduce contaminant concentrations prior to discharge. 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 facility.

2.1.6 Vapor Intrusion Limitations

For residential enclosed structures intended for human occupancy on the ground floor, appropriate vapor intrusion mitigation measures are required to mitigate exposure risks from the vapor intrusion pathway. Appropriate vapor mitigation measures may include, but are not limited to, installation of a suitable vapor barrier, installation of a passive or active sub-slab or sub-membrane depressurization system, or construction of occupied structures utilizing positive-pressure ventilation systems. If future data demonstrate an acceptable level of exposure risk relative to the vapor intrusion pathway, future residential land use and land use involving sensitive populations on the ground floor may be permissible without vapor mitigation measures subject to prior notification to, and approval by, the Director.

2.2 Long-term Groundwater Monitoring

Long-term groundwater monitoring will not be required at the Facility. Although the soil gas analytical results indicate that neither PCE, nor benzene, are currently present in the soil gas at concentrations that would warrant a vapor barrier beneath future residential development in the areas sampled, a vapor barrier will be installed beneath any future ground floor residential unit constructed on the Facility as a precautionary measure for future residential receptors and to eliminate the need for long-term groundwater monitoring at the Facility. Additionally, the first floor of the proposed structure will be 43,576 square feet of space, of which only 4,817 square feet will be residential. The vast majority of the first floor of the building will be a parking garage (34,001 square feet), with remaining portions being commercial, storage, lobby, and office space.

2.3 Maintenance, Access, and Inspections

Under the EC, the Owner of the Facility 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 Facility 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.

2.3.1 Notice

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

2.4 Environmental Covenant

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

2.5 Site Management Contacts

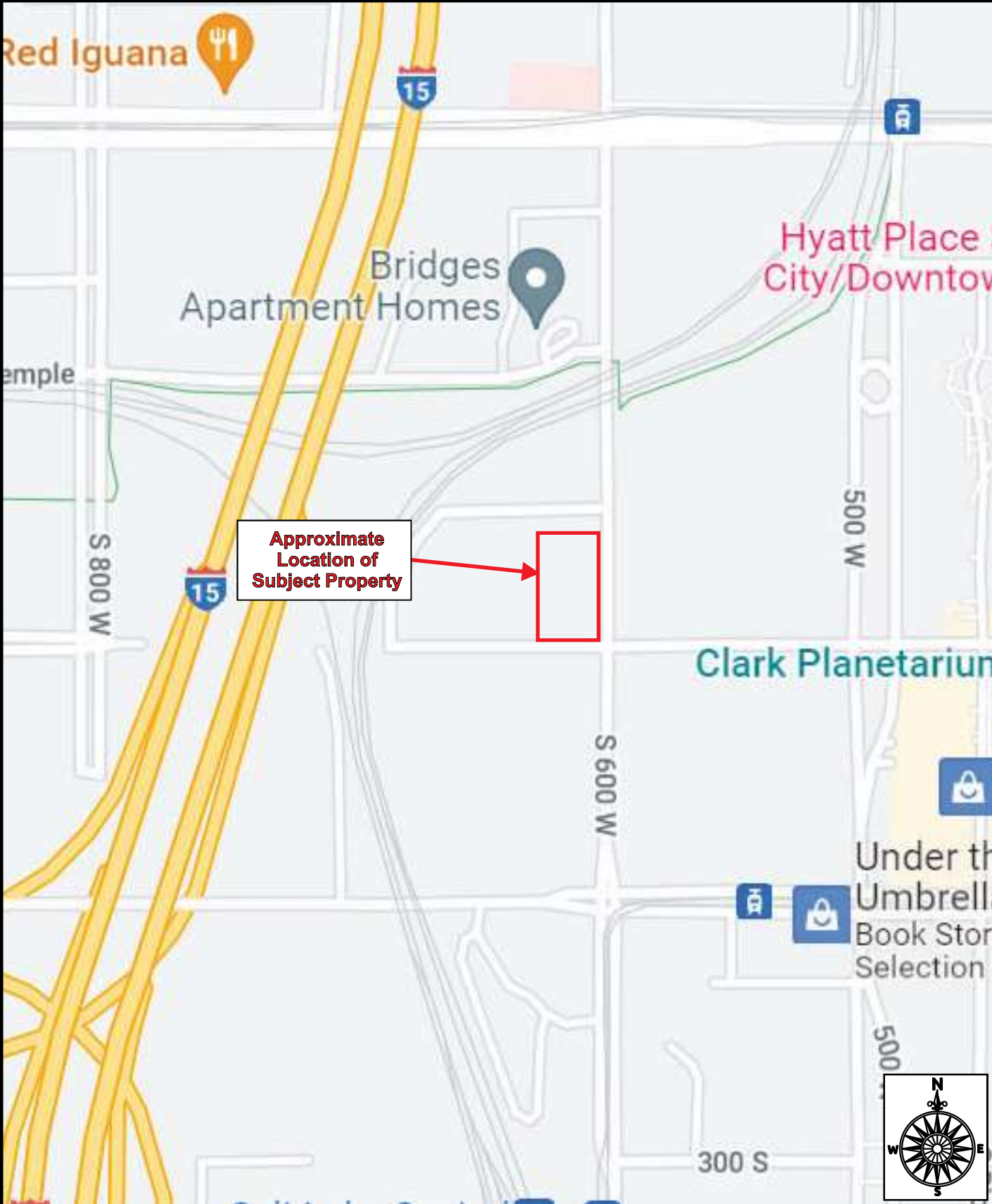
Inquiries concerning the SMP should be directed to the following:

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Utah Department of Environmental Quality
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Director
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Exhibit A

Vicinity Map and Parcel Map



**Approximate
Location of
Subject Property**

Vicinity Map

Figure 1



Benzene and PCE Concentration in Groundwater Map

Figure 2