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2465 South 1100 West, Woods Cross - Updated SMP

1 message

Quinn, Patrick <Patrick.Quinn@arcadis.com>

Mon, Nov 7, 2022 at 3:49 PM

To: Jasin Olsen <jbolsen@utah.gov>

Cc: Michelle Stayrook [redacted], Howard Jensen [redacted], "Fischer, Emily"

[redacted], Brett Jenkins [redacted], Ethan Tucker [redacted],
[redacted], Brad Maulding <bmaulding@utah.gov>,
Eric Baiden <ebaiden@utah.gov>, "Sager, Shawn" [redacted], "dwmrcsubmit@utah.gov"

dwmrcsubmit@utah.gov

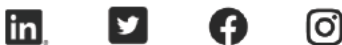
Jason,

Please see the attached Updated Site Management Plan (SMP) for the former Univar Solution facility located at [2465 South 1100 West Woods Cross, Utah](#). The Updated SMP was prepared at the request of UDEQ following the May 3, 2022 conditional closure approval letter and is meant to replace the 2016 version of the SMP. The document is ready for the required 30-day public comment period. The Division's email address is cc'd to help ensure the electronic file is saved appropriately. Please confirm receipt and let me know if you have any question.

Thank you,

Pat

Patrick Quinn
Certified Project Manager 2
Arcadis U.S., Inc.
T +1 303 471 3507
M +1 303 906 4185
www.arcadis.com



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2 attachments



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State of Utah Mail - 2465 South 1100 West, Woods Cross - Updated SMP



2022-11-07 2465 South 1100 West Updated SMP.pdf

2124K



Univar Solutions USA Inc.

Updated Site Management Plan

**Former Univar Solutions Facility
2465 South 1100 West
Woods Cross, Utah**

November 7, 2022

Updated Site Management Plan

Former Univar Solutions Facility
2465 South 1100 West
Woods Cross, Utah

November 7, 2022

Prepared By:

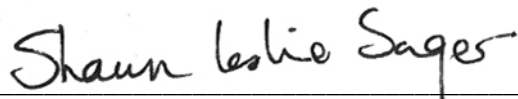
Arcadis U.S., Inc.
630 Plaza Drive, Suite 200
Highlands Ranch
Colorado 80129
Phone: 720 344 3500
Fax: 720 344 3535

Prepared For:

Univar Solutions USA Inc.

Our Ref:

30115122



Shawn L. Sager, Ph.D.
Principal Scientist



Patrick Quinn
Certified Project Manager

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Acronyms and Abbreviations

Arcadis	Arcadis U.S., Inc.
CAP	Corrective Action Plan
EC	Environmental Covenant
HHRA	human health risk assessment
property	property located at 2465 South 1100 West, Woods Cross, Utah
RBTL	risk-based target level
ROI	Report of Investigation
RBTL	risk-based target level
SMP	Site Management Plan
SVE	soil vapor extraction
UDEQ	Utah Department of Environmental Quality
Univar Solutions	Univar Solutions USA Inc.
VOC	volatile organic compound

1 Introduction

On behalf of Univar Solutions USA Inc. (Univar Solutions), Arcadis U.S., Inc. (Arcadis) prepared this Updated Site Management Plan (Updated SMP) for the property located at 2465 South 1100 West, Woods Cross, Utah (property; Figure 1). The property was used as a chemical storage and distribution facility between approximately 1963 and 2019. The area where chemical constituents released at or from the former chemical storage and distribution facility have come to be located constitutes the “site” that is the subject of this Updated SMP.

Investigations, risk assessments, corrective actions, and other remedial actions were performed at the site between 2001 and 2021. In 2021, the Utah Department of Environmental Quality (UDEQ) approved risk-based target levels (RBTLs) for the constituents of concern at the site. Soil, groundwater, and soil gas sampling indicate the site meets the RBTLs, except ethylbenzene and trichloroethene remain in soil at concentrations above the risk-based soil to groundwater leaching criteria.

The purpose of this Updated SMP is to describe the activity and use limitations that apply to the property to protect human health from exposure to the site-related constituents that remain in soil and groundwater. This Updated SMP replaces the original Site Management Plan, dated September 26, 2016 (Original SMP; Arcadis 2016a), which described the activity and use limitations that applied to the property prior to completion of the corrective actions.

2 Property and Site Background

This section describes the history of the property and the remediation history of the site.

2.1 Property History

The property was originally developed in 1963 as a ChemCentral Facility for chemical packing and distribution, and comprises two parcels located in a mostly industrial area in Woods Cross, Utah. Two residential lots are located across a road to the west of the property. Univar Solutions acquired ChemCentral in October 2007 and maintained chemical packaging and distribution operations until June 2019 when operations ceased, the aboveground storage tanks were removed, and inventories were transferred to other Univar Solutions operating branches. The property was sold on June 23, 2020 to TRGS, LLC.

The Original SMP (Arcadis 2016a) focused on the East Lot, Back Dock, and West Parking Lot areas of the property while corrective action were being performed in the Tank Farm/Truck Transfer Area/North Dock Area. This Updated SMP applies to the entire property. The property is depicted on Figure 2.

2.2 Remediation History

The chemical constituents at the site were first discovered in 2001 by ConocoPhillips, which was performing a sampling event on the property to monitor petroleum releases from its petroleum bulk storage facility located at 245 East 1100 North, North Salt Lake, Utah (ConocoPhillips Property).

Environmental investigations completed between 2001 and 2016 identified various volatile organic compounds (VOCs) and petroleum hydrocarbons as the contaminants of concern for the site, including tetrachloroethene, trichloroethene, cis-1,2-dichloroethene, vinyl chloride, 1,1,1-trichloroethane, 1,1-dichloroethene, 1,2-dichloroethane, dichloromethane, benzene, toluene, ethylbenzene, and total xylenes. The results of the environmental investigations are summarized in a Report of Investigation (ROI) dated April 2010, and a Supplemental ROI dated October 2015.

Based on the results of the environmental investigations and a human health risk assessment, the UDEQ determined a site management plan and an environmental covenant were required for the site. Accordingly, the Original SMP (Arcadis 2016a) was developed for the property and an Environmental Covenant was executed and recorded in Davis County on November 2017 (Original EC; UDEQ 2017).

Corrective actions were performed at the site between 2017 and 2021 in accordance with a Corrective Action Plan dated September 29, 2016. The corrective actions consisted of soil vapor extraction (SVE) and monitored natural attenuation. The SVE system removed approximately 5,000 pounds of contaminant mass.

In 2021, the UDEQ approved RBTLs for the constituents of concern at the site. Soil gas and groundwater sampling completed after the SVE system was decommissioned indicate the site meets the RBTLs, except ethylbenzene and trichloroethene remain in soil at concentrations above the risk-based soil to groundwater leaching criteria.

The UDEQ has determined that with proper site controls, the site no longer presents a hazard to human health or the environment. The site controls consist of this Updated SMP and an Amended and Restated Environmental Covenant, which was recorded in Davis County on [REDACTED], 2022 (Amended and Restated EC). A copy of the Amended and Restated EC is included in Appendix A.

2.3 ConocoPhillips Site

Environmental investigations indicate that petroleum hydrocarbons released at and from the ConocoPhillips Property have migrated to the property through groundwater. ConocoPhillips has installed groundwater monitoring wells on the property and periodically analyzes groundwater samples collected from those wells. In approximately 2008, ConocoPhillips installed a groundwater pump and treat system at the downgradient edge of the ConocoPhillips Property to prevent the continued migration of the petroleum hydrocarbons from the ConocoPhillips Property to the property. Although this system was operational between 2008 and 2018, petroleum hydrocarbons remain under the property at concentrations exceeding Utah Groundwater Quality Standards. Figure 2 shows the ConocoPhillips monitoring wells that remain at the property. Remediation and monitoring of the petroleum hydrocarbons are ongoing and are managed by the UDEQ Division of Environmental Response and Remediation. This Updated SMP does not apply to the petroleum hydrocarbons associated with the ConocoPhillips Property.

3 Site Risk

Results of the human health risk assessment (HHRA; presented as Appendix D to the Supplemental Report of Investigation [Arcadis 2015]) indicated that conditions at the site were acceptable for industrial uses at the time of the HHRA, although corrective action was recommended for a portion of the site to reduce potential future risks.

A memorandum (Memorandum; Arcadis 2021a) submitted to the UDEQ on April 13, 2021 presented health-based cleanup goals for groundwater that are protective of current and potential future human exposures. A revised memorandum (Revised Memorandum; Arcadis 2021b) addressing the UDEQ comments was submitted on July 19, 2021. The Revised Memorandum was subsequently approved by the UDEQ on August 18, 2021 (UDEQ 2021). The approved remedial goals or RBTLs established health-based cleanup standards for the protection of residential and nonresidential exposure, assuming the activity and use limitations in the Original EC remain in place.

In the 2021 Annual Groundwater Monitoring Report (Arcadis 2021c), groundwater analytical data were compared to the on-property and off-property RBTLs and soil vapor analytical data were compared to the target soil gas concentrations presented in the Revised Memorandum (Arcadis 2021b). The results of this comparison are further discussed below.

3.1 Soil

SVE was implemented to address soil impacts that required corrective action, due to a potential future vapor intrusion risk assuming a small, poorly ventilated building is constructed on the property. Currently, exposure to soil is unlikely to occur and the concentrations are not expected to pose a threat to workers at the property.

3.2 Soil-to-Groundwater Pathway

The soil-to-groundwater screening levels were recalculated as part of the Conditional Closure Request (Arcadis 2022) based on the RBTLs from the approved risk-based screening memo (Arcadis 2021a). Results of the updated leaching calculations indicate that only ethylbenzene and trichloroethene had maximum detected concentrations greater than the revised soil-to-groundwater screening levels. All of the other constituents were detected at concentrations less than the soil-to-groundwater screening levels. While ethylbenzene and trichloroethene were detected at concentrations greater than the revised soil-to-groundwater screening levels, it should be noted that the maximum detected soil concentrations were obtained prior to operation of the SVE system, and the samples were collected in an area where shallow and deep SVE wells were operated (i.e., within the SVE system radius of influence). Furthermore, neither constituent was detected at concentrations greater than the RBTLs during the last eight groundwater sampling events, indicating that these constituents are not migrating from soil to groundwater. This leads to the conclusion that migration to groundwater is not a significant migration pathway.

3.3 Groundwater

Groundwater monitoring and reporting activities for the site were conducted between 2002 and 2021. Groundwater concentrations are stable to decreasing and have been less than the RBTLs for more than 3 years on the property and two years off the property. This indicates that corrective action activities were effective and groundwater monitoring is no longer necessary. As requested by the UDEQ in the Conditional Closure Request Approval (UDEQ 2022), all Univar Solutions groundwater monitoring wells related to the site were subsequently abandoned in September 2022 in accordance with Utah Administrative Code R655-4-14.

4 Activity and Use Limitations

This Updated SMP establishes activity and use limitations that apply to the property. The activity and use limitations are designed to limit the potential for human exposure to chemical constituents that may remain at the property. The Amended and Restated EC obligates the property owner to comply with this Updated SMP. Any proposed modification to this Updated SMP requires approval by the UDEQ.

4.1 Land Use Limitations

The property is located in an area zoned I-2 for industrial land use. As such, the current zoning prohibits residential land use. The Amended and Restated EC establishes additional limitations, prohibiting residential use and other sensitive uses, including childcare facilities, early education schools and growing edible crops. The property owner may petition the UDEQ to modify or remove the land use limitations established by the Amended and Restated EC upon a demonstration that the remaining level of risk at the property is sufficiently reduced to the point that the limitations are no longer necessary.

4.2 Groundwater Use Limitations

Groundwater in the shallow unconfined aquifer shall not be used for potable, culinary, domestic, process, irrigation or any other purposes except taking environmental samples. Any other uses of groundwater on the property shall be reviewed and approved by the UDEQ Director prior to implementation.

4.3 Disturbance Limitations

Ethylbenzene and trichloroethene remain in soil at concentrations exceeding the risk-based soil to groundwater leaching criteria in the location of the property shown on the attached Figure 3 (the Impervious Area). To minimize the potential for soil-to-groundwater migration, the integrity of impervious surfaces (i.e., asphalt or concrete) in the Impervious Area must be maintained by the property owner including sealing of cracks and replacement of impervious surfaces as part of property redevelopment within a reasonable timeframe to prevent leaching of soil to groundwater.

The property owner must implement appropriate health and safety practices before performing any drilling, digging, grading, excavation, or other earthwork within the Impervious Area or other portions of the Property. These practices should include, at minimum notifying any contractor conducting subgrade work of the presence of chemical constituents that may remain in soil at the property, recommendations as to the appropriate personal protective equipment (PPE) that should be donned and preparation of a Health and Safety Plan. Proper training and Occupational Safety and Health Administration (OSHA) requirements should also be verified for contractors. Any excavated soils from the Impervious Area should be stockpiled on plastic sheeting (i.e. visqueen), managed to prevent contact and sampled for characterization for appropriate use or disposal. If disposal is required, impacted soils should be transported under a bill of lading or manifest to a licensed disposal facility as needed.

The Amended and Restated EC establishes the preceding disturbance limitations and obligates the property owner to comply with this Updated SMP. The property owner may petition the UDEQ to modify or remove the limitations upon a demonstration that the level of risk remaining at the property is sufficiently low that the limitations are no longer necessary.

4.4 Property Access

The property owner is obligated under the Amended and Restated EC to provide the UDEQ and its authorized representatives with access to the property at reasonable times to observe activities carried out under this Updated SMP.

5 References

- Arcadis. 2015. Supplemental Report of Investigation. Univar USA, Inc. Woods Cross Facility, Woods Cross, Utah. October.
- Arcadis. 2016a. Site Management Plan. Univar USA, Inc. Woods Cross Facility, Woods Cross, Utah. September 26.
- Arcadis. 2016b. Corrective Action Plan. Univar USA, Inc. Woods Cross Facility, Woods Cross, Utah. September 29.
- Arcadis. 2021a. Risk-Based Closure Standards Evaluation Memorandum. Univar Solutions USA Inc. 2465 South 1100 West, Woods Cross, Utah. April 13.
- Arcadis. 2021b. Risk-Based Closure Standards Evaluation – Revised. Univar Solutions USA Inc. 2465 South 1100 West, Woods Cross, Utah. July 19.
- Arcadis. 2021c. 2021 Annual Groundwater Monitoring Report. Univar Solutions USA Inc., Woods Cross, Utah. November 29.
- Arcadis. 2022. Conditional Closure Request. Univar Solutions, 2465 South 1100 West, Woods Cross, Utah, UTD000710723. April 1.
- UDEQ. 2009. Stipulation and Consent Agreement No. 0802006 issued by the Utah Solid and Hazardous Waste Control Board for the Univar USA Inc., Woods Cross Facility, 2465 South 1100 West, Woods Cross, Utah, UTD000710723. October 22.
- UDEQ. 2016. Approval of Corrective Action Plan. Univar Woods Cross Facility, 2465 South 1100 West, Woods Cross, Utah, UTD000710723. October 28.
- UDEQ. 2017. Environmental Covenant for Univar USA, Inc. Woods Cross Facility, 2465 South 1100 West, Woods Cross, Utah, EPA ID No. UTD000710723. November 2.
- UDEQ. 2020. Response to: Soil Vapor Extraction Operations Shutdown. Univar – Woods Cross Facility, 2465 South 1100 West, Woods Cross, Utah, EPA ID #UTD000710723. December 24.

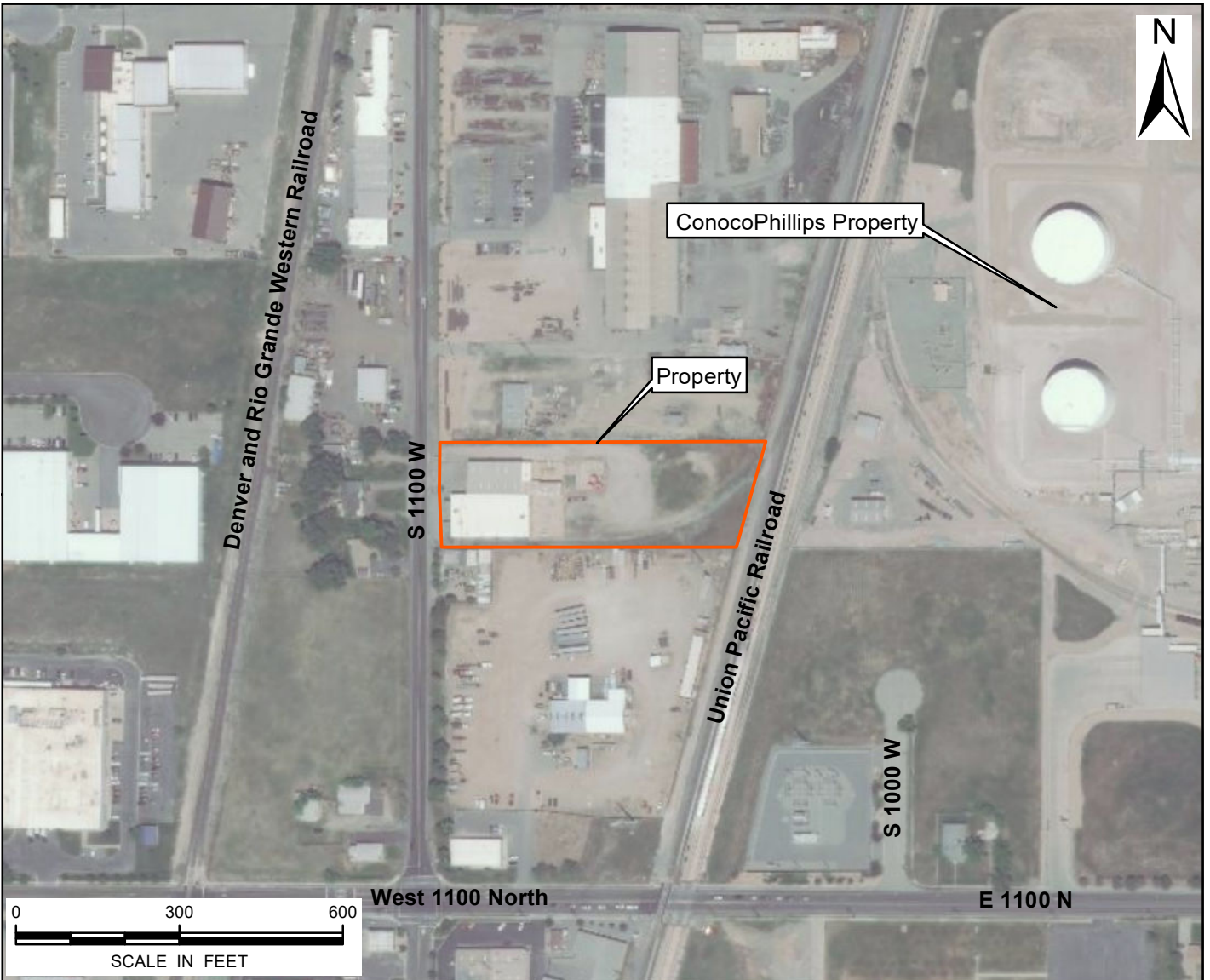
Updated Site Management Plan

UDEQ. 2021. Risk-Based Closure Standards Evaluation – Revised. Univar Solutions USA Inc., 2465 South, 1100 West, Woods Cross, Utah, EPA #UTD000710723. Approval letter from Douglas J. Hansen, Director, Division of Waste Management and Radiation Control, to Michelle Stayrook, Remediation Manager, Univar Solutions USA Inc. August 18.

UDEQ. 2022. Conditional Closure Request Approval. EPA # UTD000710723, Univar USA Inc. former Woods Cross Facility. Letter from Douglas J. Hansen, Director, Division of Waste Management and Radiation Control, to Michelle Stayrook, Remediation Manager, Univar USA Inc. May 3.

Figures

CITY: (DEN_TECH) DIV/GROUP: (ENV/GIS) LD: (B-ALTO) PIC: (J-WHITNEY) PM: (:) TM: (K-HEINZE)
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PROJECTION: NAD 1983 STATEPLANE UTAH NORTH FIPS 4301 FEET

Service Layer Credits: Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community





FORMER UNIVAR SOLUTIONS USA INC.
2465 SOUTH 1100 WEST, WOODS CROSS, UTAH

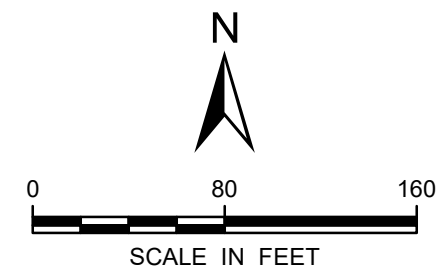
VICINITY MAP

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LEGEND

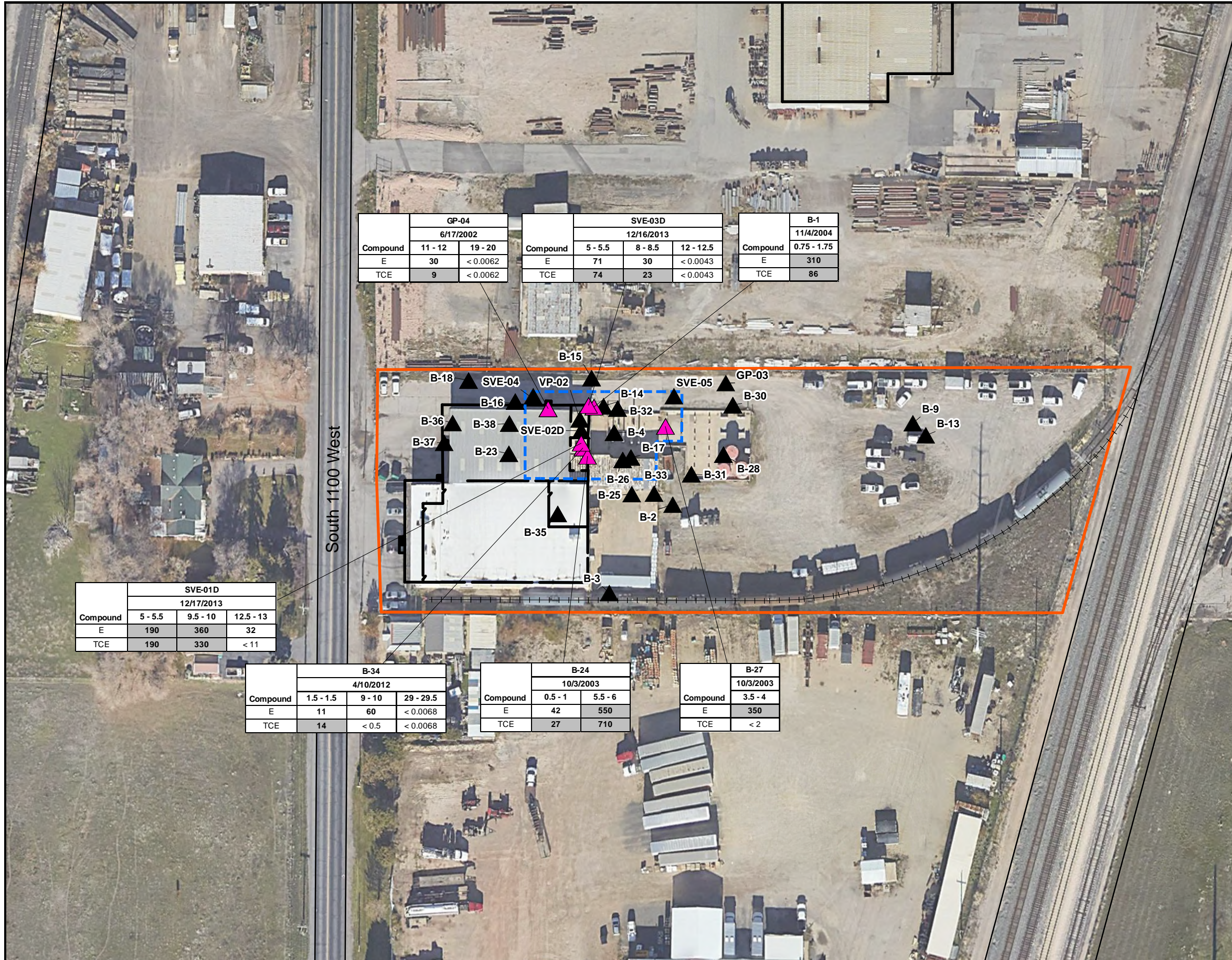
-  ConocoPhillips Monitoring Well
-  Fence
-  Rail Line
-  Property Boundary



FORMER UNIVAR SOLUTIONS USA INC
2465 SOUTH 1100 WEST, WOODS CROSS, UTAH

MAP OF PROPERTY - OCTOBER 2022

 **ARCADIS** | FIGURE 2

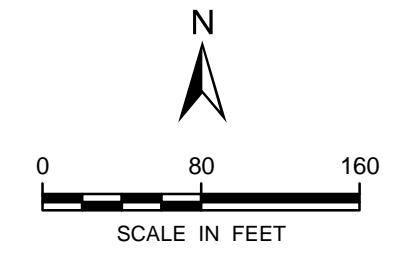


LEGEND

- ▲ Historical Boring Location (No Exceedance of Soil to Groundwater Screening Level)
- ▲ Soil Exceeds Soil to Groundwater Screening Level
- ▭ Impervious Area
- ▭ Property Boundary

Compound		Soil to Groundwater Screening Level ¹ (mg/kg)
E	Ethylbenzene	85
TCE	Trichloroethene	7

- Notes:
- ¹ Soil to groundwater screening levels developed as part of the April 2022 Conditional Closure Request (Arcadis 2022).
 - Soil data originally presented in multiple historical reports.
 - Data represents pre-remediation conditions within former Truck Transfer Area.
 - Bold** = detection
 - Shaded** = exceedance of screening level
 - mg/kg - milligrams per kilogram
 - NA - not analyzed
 - Arcadis 2022. Conditional Closure Request, Univar Solutions USA Inc., 2465 South 1100 West, Woods Cross, Utah. April 1.



FORMER UNIVAR SOLUTIONS USA INC
 2465 SOUTH 1100 WEST, WOODS CROSS, UTAH

Appendix A

2022 Environmental Covenant

(Will be added after recordation)

Arcadis U.S., Inc.
630 Plaza Drive, Suite 200
Highlands Ranch
Colorado 80129
Phone: 720 344 3500
Fax: 720 344 3535
www.arcadis.com