Site Management Plan

Former Tesco-Williamsen Facility

1925 West Indiana Avenue

Salt Lake City, Utah

UTD009093683

June 17, 2015

Terracon Project No. AL147009

Prepared for:
GBGH Real Estate, LLC
14613 South Juniper Drive
Herriman, Utah 84096

Prepared by:
Terracon Consultants, Inc.
640 East Wilmington Avenue
Salt Lake City, Utah 84106

June 17, 2015

Utah Department of Environmental Quality
Division of Solid & Hazardous Waste
PO Box 144880
Salt Lake City, Utah 84114-4880

Attn: John Waldrip, Environmental Health Scientist
T: (801) 536-0238
F: (801) 536-0222

Re: Site Management Plan
Former Tesco-Williamsen Facility
1925 West Indiana Avenue
Salt Lake City, Utah
UTD009093683
Terracon Project No. AL147009

Dear Mr. Waldrip:

On behalf of our client, GBGH Real Estate, LLC, the current property owner, please find enclosed the Site Management Plan (SMP) for the above-referenced facility. The SMP prescribes site management actions based on the approved screening assessment, and includes an environmental covenant to enforce the site management requirements under this SMP.

We appreciate your review of this SMP. If you should have any questions or need additional information, please contact me at (801) 746-5462.

Sincerely,
Terracon Consultants, Inc.

Andy King, P.G.
Senior Project Manager - Environmental

Kent Wheeler
Principal / Regional Manager

ARK/KRW/ta

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FORMER TESCO-WILLIAMSEN FACILITY
1925 WEST INDIANA AVENUE
SALT LAKE CITY, UTAH
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1.0 INTRODUCTION

1.1 Scope

This Site Management Plan (SMP), prepared on behalf of the current property owner, GBGH Real Estate, LLC, describes site management actions for the former Tesco-Williamsen facility (now operated as Williamsen-Godwin) located at 1925 West Indiana Avenue in Salt Lake City, Utah (the Subject Property). These site management actions are designed to control exposure to chemical constituents that are locally present in soil and/or groundwater beneath portions of the Subject Property, such that human health risks from these constituents are maintained within the acceptable range for continued use as an industrial facility.

This SMP has been prepared in response to Utah Department of Environmental Quality (UDEQ), Division of Solid and Hazardous Waste (DSHW) correspondence dated April 13, 2015. This SMP is based on the results of a Screening Risk Assessment Report (SRAR, Glaser, 2015) submitted to DSHW, as approved in the April 13, 2015 correspondence. Based on the results of the SRAR, this SMP is not required to include corrective action but does include appropriate site management actions; these are detailed in Section 4 of this SMP.

1.2 Site Background and Previous Site Investigations

Tesco Williamsen (now Williamsen Godwin) is a manufacturer of specialty transport trailers, dump-truck beds and liners, truck parts, and other specialty equipment. Readily available information indicates that manufacturing began on this property at least as early as 1959. Historical operations at the Subject Property have included truck part and equipment manufacturing, sandblasting, painting operations, historic underground storage tank (UST) use, and use of industrial machinery (EarthTouch, 2013). The site is now leased to Williamsen Godwin. The site is in an area zoned for commercial/industrial land use (M-1, light manufacturing; Salt Lake City, April 2015), and the actual land use (current and future) at the site is commercial/industrial. Land use at the site does not include residential.

Previous investigations identified the localized presence of volatile organic compounds (VOCs) in soil and groundwater at the site. An initial subsurface investigation was performed in 2013 by

EarthTouch, Inc. (EarthTouch, 2013). Terracon subsequently conducted two Limited Site Investigations (LSIs) in January and June of 2014, and also conducted limited sub-slab soil vapor sampling in December 2014 to provide additional data for use in the screening risk assessment. A site diagram showing Terracon's sampling locations and those from the previous EarthTouch investigation relative to pertinent site features is provided in Appendix A.

In July 2013, EarthTouch completed a Phase I Environmental Site Assessment (ESA), followed by a subsurface investigation in August 2013 that identified the presence of contaminants in soil and groundwater at several locations. The contaminant types generally included petroleum products, VOCs, including chlorinated VOCs, and arsenic. At several locations, concentrations of one or more of these contaminants in soil and/or groundwater exceeded regulatory screening levels. In August 2013, EarthTouch notified the UDEQ, Division of Water Quality (DWQ), and provided the agency with a copy of their Limited Subsurface Investigation report. The DWQ later forwarded the report to the Division of Solid & Hazardous Waste (DSHW), a sister agency within the UDEQ, because of the presence of chlorinated VOCs.

Terracon subsequently met with representatives of the UDEQ – DSHW in September 2013 to evaluate the type(s) of follow-up actions that the agency may require for the site. The agency indicated that additional investigation should be conducted to establish the local groundwater flow direction(s), identify/confirm the contaminant source(s), and determine the overall extent of contamination. Of the identified contaminant types, chlorinated VOCs were identified as those most likely to drive regulatory requirements for follow-up actions, if any.

Terracon conducted an initial Limited Site Investigation (LSI) in January 2014 and a follow-up LSI in June 2014, and provided copies of Terracon's LSI reports to DSHW in July 2014. Terracon's initial LSI of January 2014 included advancement and completion of three soil borings as monitoring wells (T-1, T-2, and T-3). Groundwater elevation data obtained from the initial three wells in January 2014 indicated a groundwater flow direction to the southeast, approximately 6 feet below the ground surface (bgs). During Terracon's follow-up LSI of June 2014, three additional borings were advanced and completed as monitoring wells (T-4, T-5, and T-6). With the addition of the three additional wells, groundwater elevation data obtained in June 2014 indicated an overall flow direction generally to the east-southeast, with an apparent localized area of mounding centered in the area of well T-1. Two of the subsurface soil samples (from boring T-1 in the initial LSI and from boring T-5 in the follow-up LSI) contained detectable concentrations of VOCs, but none of the analyzed constituents were detected at concentrations that exceeded regulatory screening levels for soils. Of the VOCs detected, several constituents from boring T-1 appear to be associated with degraded petroleum. Certain other constituents appear to be associated with breakdown products of tetrachloroethylene (PCE). None of the other soil samples analyzed contained any constituent concentrations above laboratory method reporting limits.

Based on the results of Terracon's LSIs and a review of the previous soil and groundwater data reported by EarthTouch in August 2013, the pattern of detected constituents and their relative concentrations suggests a past release of chlorinated solvents and petroleum products in the area of well T-1. The released constituents appear to have degraded over time, and as they have migrated down-gradient towards monitoring wells T-3 and T-5. There is no indication that released constituents have moved west towards monitoring well T-4 in the northwestern portion of the site.

Well T-1 is situated near a sump/oil-water separator ("sump") that was previously connected to a series of floor drains (trench drains) within the building to the east. These former trench drains no longer exist and were reportedly disconnected from the sump and sealed years or decades ago. The sump remains in place and is apparently connected to the sanitary sewer system, and was cleaned out in September 2013 after the initial EarthTouch investigation. The sump is currently used to capture water from the washing of trucks and/or equipment, which is conducted directly over this feature, and it is possible that the system may also receive limited quantities of runoff water during storm events. For convenience, the immediate vicinity of this feature is referred to as the Sump Area.

The pattern of detected constituents also suggests a past petroleum release in the central portion of the site near the Paint Building, as indicated by constituents that have been detected in groundwater at Terracon's well T-2 and in three nearby borings that were previously advanced during the EarthTouch investigation of August 2013. The source for these contaminants was not identified.

Detected concentrations of VOCs in groundwater decreased significantly between the time of Terracon's initial and follow-up groundwater monitoring events in January and June of 2014, with reductions of up to two orders of magnitude during that timeframe. Six of the VOC constituents initially detected were present at concentrations exceeding primary drinking water Maximum Contaminant Levels (MCLs). During Terracon's follow-up groundwater monitoring conducted in June 2014, most of the same constituents were detected but at much lower concentrations, with only three of the VOC constituents detected at concentrations exceeding MCLs.

Terracon's LSI activities did not include analyses for arsenic or other metals, as there are no known on-site sources of metals releases. The relatively high arsenic concentrations that were previously identified in site groundwater appear to be from the nearby Portland Cement CERCLA site, which is known to have released arsenic to groundwater in the area.

1.3 Screening Risk Assessment

In correspondence dated October 21, 2014, DSWH representatives recommended that a screening risk assessment be performed to "provide guidance on the severity of the contamination problem at the site, and help determine if additional evaluation is needed." The SRAR was subsequently developed by Steven L. Glaser Environmental Consulting, using data from the EarthTouch investigation and Terracon's LSIs, and also using data from Terracon's limited sub-slab soil vapor sampling that was conducted in December 2014. The SRAR approach, methodology, and assumptions were developed with input from DSHW representatives. The final Screening Risk Assessment Report (Glaser 2015) was approved by DSHW in correspondence dated April 13, 2015.

The SRAR was prepared with two primary purposes: 1) to evaluate risks to current site workers; and 2) to evaluate risks to future workers should the site configuration change; e.g., for buildings to be constructed where there currently are none or for a small office space to be constructed where there are currently manufacturing operations. The SRAR also considered evaluation of risks to potential future construction workers where appropriate. As a screening evaluation, the SRAR used maximum detected concentrations and other assumptions that resulted in conservative results (i.e., results that were likely to overestimate risks).

The SRAR focused on two primary areas where the highest VOC concentrations had been identified in soil and/or groundwater, including the Sump Area and the Paint Building. The SRAR also focused on the existing Parts Department Area and on the Sandblast Area, where the highest metals concentrations had been identified in soils. As groundwater is not used at the site, the risks from use of the shallow aquifer were not evaluated.

For current site workers, the only potentially complete exposure pathway would be the inhalation of VOCs released from groundwater and/or soil into a building. This process is known as vapor intrusion. The SRAR included evaluation of several exposure pathways that varied by area and potential receptor, including future site workers and future construction workers. Exposure pathways included vapor intrusion, incidental ingestion of soil, dermal contact with soil, dust inhalation, inhalation of constituents that volatilize from soil, incidental ingestion of groundwater, and dermal exposure to groundwater.

2.0 REMAINING CONSTITUENTS

There are two primary areas where impacts from VOCs have been identified at the site. One is the Sump Area in the northwest portion of the property, where the primary VOCs identified were chlorinated hydrocarbons in groundwater. The second is the Paint Building Area, where the highest petroleum hydrocarbon concentrations were identified in soil and groundwater. VOC concentrations are much lower in other parts of the site. The concentrations of VOCs in

groundwater decreased by up to two orders of magnitude between the time of Terracon's initial and follow-up groundwater monitoring events in January and June of 2014. As of June 2014, only benzene at monitoring well MW-T1; 1,1-dichloroethane at monitoring well MW-T6; and vinyl chloride at monitoring wells MW-T1, MW-T3, and MW-T5 exceeded the MCLs.

For the most part, metals concentrations in subsurface soils are generally consistent with the expected normal range of background concentrations in the Salt Lake Valley. The highest metals concentrations in subsurface soils were detected at the Sandblast Area and near the Paint Building. Chromium concentrations in soils in both of these areas appear to be moderately elevated above naturally occurring background concentrations.

3.0 SITE RISK

This section summarizes the results of the screening risk assessment. Details of the screening risk assessment procedures and results are provided in the *Screening Risk Assessment, Former Tesco Williamsen Facility, 1925 West Indiana Avenue, Salt Lake City, Utah* (Glaser, Steven L. Environmental Consulting, March 2015).

Two endpoints were calculated: the potential for people to develop cancer, and the potential for health effects to occur other than cancer. Cancer risks below one-in-a-million (1×10^{-6}) are considered *de minimis*. Under Utah Administrative Code Rule R315-101, risks greater than one-in-ten thousand (1×10^{-4}) require corrective action. Corrective action is a discretionary component of site management when the cancer risk is less than 1×10^{-4}. The hazard index (HI) compares the potential exposure that could occur to an estimate of the potential exposure necessary to cause non-cancer health effects in humans. An HI greater than 1 typically requires that corrective action be a component of site management. However, as requested by DSHW, the site risks were evaluated as a screening risk assessment (with highly conservative assumptions that tend to overestimate risk), and there is not a direct link between the screening risk assessment results and the need for site management or corrective action. Nonetheless, these criteria provide a useful interpretive framework.

The screening risk assessment estimates of the cancer risk and hazard index for each receptor in each area of the site are summarized in the table below. A discussion of these estimated risks relative to appropriate controls, where applicable, is provided in Section 4.3.

SUMMARY OF SCREENING CANCER RISK AND HAZARD INDEX ESTIMATES

Location	Receptor	Current or Future	Exposure Medium		Cancer Risk	Hazard Index
Parts Department - current building						
	Site Worker	Current	Indoor Air		3.E-05	0.2
Paint Building - existing building (current worker); smaller replacement building (future worker)						
	Site Worker	Current	Indoor Air		1.E-07	0.05
	Site Worker	Future	Soil		3.E-06	0.007
			Indoor Air		2.E-06	0.9
				Total:	*5.E-06*	
	Construction Worker	Future	Soil		3.E-06	1
Sandblast Area - outdoor worker; no building assumed						
	Site Worker	Future	Soil		6.E-06	0.2
	Construction Worker	Future	Soil		1.E-06	0.1
Sump - future building (no building currently present)						
	Site Worker	Future	Soil		1.E-06	0.002
			Indoor Air		5.E-05	*2**
				Total:	*5.E-05*	
	Construction Worker	Future	Soil		5.E-07	0.04

** Estimated hazard index value of 2 derives mostly (1.8) from vapor intrusion of xylenes from soil, but the underlying calculations do not account for petroleum vapor biodegradation. This results in a significant overestimate of exposure and inflation of the overall hazard index value.*

Based on the screening risk estimates summarized above, DSHW noted in correspondence dated April 13, 2015 that the conditions are acceptable for industrial uses, and indicated that a residential land use restriction would be a recommended measure to include in the SMP. Appropriate site management controls, including land use restrictions, are detailed in Section 4 of this SMP.

4.0 SITE MANAGEMENT REQUIREMENTS

4.1 Land Use Restrictions

The Subject Property is in an area zoned for commercial/industrial land use. As such, the current zoning precludes residential land use. Additional land use restrictions will be imposed to prevent residential development and ensure that the property is used solely for appropriate commercial and industrial uses in the future. These restrictions will be imposed and enforced on the current property owner and subsequent property owners through an environmental covenant placed on the title of the property.

4.2 Groundwater Use Restriction

As previously stated, groundwater in the shallow aquifer beneath the site (at a typical depth of approximately 6 feet below the ground surface) may contain elevated concentrations of arsenic (evidently related to off-site contaminant sources that are not related to on-site operations) and locally elevated concentrations of certain VOC constituents. Because groundwater is not used at the site, risks from use of the shallow aquifer were not evaluated in the screening risk assessment. However, if groundwater from the shallow aquifer beneath the site were to be extracted for use without suitable treatment, undesired exposure to contaminants could occur. Therefore, a restriction will also be placed to prevent use of groundwater from the shallow aquifer beneath the site without suitable treatment. The property owner may petition DSHW to modify or remove the restriction on groundwater use if an evaluation of groundwater monitoring results demonstrates a decrease of contaminants to concentrations that do not pose a significant health risk.

This paragraph applies to cases in which groundwater is encountered during a normal work activity such as excavation for construction activities or underground utility placement, where groundwater needs to be removed to facilitate that work activity. Groundwater management options are intended to comply with the principles of non-degradation in R315-101-3. In the event that temporary excavation dewatering is needed to facilitate a work activity, groundwater may be temporarily stored and later returned directly to the aquifer from which it originated within the area adjacent to the ongoing work, so long as the return of that groundwater does not meet the criteria of an injection well as defined at Utah Administrative Code R317-7-2.53. Groundwater may also be discharged offsite to a sanitary sewer system with prior approval from the system's Publicly Owned Treatment Works (POTW), and may be discharged offsite to a storm water system with prior approval from the Utah Division of Water Quality.

4.3 Additional Contingent Exposure Controls

Under current and future conditions, no additional controls, beyond the land use and groundwater use restrictions identified above, are required to maintain risk levels within the

acceptable range for continued industrial use. However, in the event that certain conditions were to change at specific areas of the site, it may be appropriate to consider additional exposure controls. Following is a discussion of potential additional exposure controls, relative to the screening risk estimates for each receptor in each area of the site. These additional measures are not requirements of this SMP, but are additional contingent controls that could be implemented to further reduce exposure.

4.3.1 Parts Department

Parts Department, Current Worker - For a current site worker exposed to groundwater constituents via vapor intrusion at the Parts Department, the estimated cancer risk was 3×10^{-5} and the hazard index was 0.2. The cancer risk was associated with vinyl chloride. These results may be overestimates, as the maximum detected groundwater concentration for vinyl chloride (from the initial EarthTouch investigation of 2013) was used in the vapor intrusion modeling. Subsequent groundwater samples from monitoring well T-1, at the same approximate location, demonstrated a decrease in vinyl chloride concentrations by two orders of magnitude between January 2014 and June 2014. Such a concentration decrease would lead to proportionally lower risk estimates.

> *Additional Contingent Controls* - No additional contingent controls are required for current workers at this location. However, to provide further assurance that risk levels remain within the acceptable range, floor cracks (if any) in the Parts Department area could be sealed.

4.3.2 Paint Building

Paint Building, Current Worker - For a current worker at the Paint Building, the cancer risk was estimated at 1×10^{-7} and the hazard index was calculated to be 0.05. These are *de minimis* risk estimates, and vapor intrusion does not pose a risk to current workers at this building.

> *Additional Contingent Controls* - No additional contingent controls are required for current workers at this location.

Paint Building, Future Worker - If the existing Paint Building were to be replaced with a much smaller office building, the potential for vapor intrusion may increase. Vapor intrusion was evaluated for a hypothetical future worker at a building with a volume 19 times less than the existing Paint Building. In addition, the future worker was assumed to be exposed via incidental soil ingestion involving constituents in soil that are currently at depth. Under these conditions, the calculated cancer risk was 5×10^{-6} and the hazard index was 0.9.

The cancer risk had two primary components: incidental ingestion of chromium in soil and inhalation of ethylbenzene that migrates into indoor air via vapor intrusion. Chromium was conservatively assumed to be in its more toxic hexavalent state. To the extent that it is in its trivalent oxidation state, it will not contribute to a cancer risk. Even assuming that chromium

was 100 percent in the hexavalent state, the chromium-related cancer risk was only 3 x 10^{-6}. The ethylbenzene vapor intrusion results were based on soil gas data collected immediately below the building slab.

> *Additional Contingent Controls* – If a new smaller building were planned for construction in this area, it would be appropriate to further evaluate and address the potential for vapor intrusion. Vapor mitigation, if needed, could include building design controls (e.g., inclusion of vapor barriers or venting systems) and/or removal of subsurface vapor sources (petroleum-impacted soil). To address the presumed risk contribution from chromium, subsurface soil samples could be analyzed for chromium speciation to evaluate whether hexavalent chromium is actually present (and hence, whether or not the chromium actually contributes to risk). Additionally, it may be appropriate to consider measures to prevent workers' exposure by incidental ingestion of any subsurface soils that may be exhumed in this area during construction.

Paint Building, Future Construction Worker - For a future construction worker in the vicinity of the Paint Building, it was assumed that exposure could occur via incidental ingestion of soil, dermal contact with soil, inhalation of dust, and inhalation of constituents volatilizing from soil. Exposure to groundwater was also quantified, with the risk estimates accounting for incidental ingestion and dermal contact with groundwater.

Under these conditions, the cancer risk was estimated at 3 x 10^{-6} and the hazard index was estimated to equal 1. The estimated cancer risk was derived from inhalation of ethylbenzene that volatilizes from soil and chromium in dust. Risks associated with groundwater constituents were *de minimis*.

Assumptions were made that may overestimate the risks associated with both of these constituents. For ethylbenzene, the maximum detected concentration in soil (which was used to estimate a concentration in air following volatilization) was almost ten times higher than the second highest concentration, also in the Paint Building area at a similar depth range. The actual concentration to which a worker would be exposed may be lower than what was assumed in the risk calculations. As discussed previously, chromium is only carcinogenic if it is in the hexavalent oxidation state. If it is solely present in the trivalent state, the associated cancer risk would be zero.

> *Additional Contingent Controls* – If excavation activities or construction work occurs in the vicinity of the Paint Building and petroleum-impacted soils are excavated, it would be appropriate to consider steps to reduce construction workers' inhalation of constituents volatilizing from soil, incidental ingestion of soil, dermal contact with soil, and inhalation of dust (for example, through appropriate dust control measures). In addition, subsurface soil samples could be analyzed for chromium speciation to evaluate whether hexavalent chromium is actually present (and hence, whether or not the chromium actually contributes to risk).

4.3.3 Sandblast Area

Sandblast Area, Future Worker - For the Sandblast Area, a future outdoor worker was assessed assuming that soil that is currently at depth was brought to the surface. The worker was assumed to be exposed via incidental ingestion of soil, dermal contact with soil, and inhalation of dust. The screening cancer risk was 7×10^{-6}; the hazard index was 0.02. The cancer risk was derived from chromium. As with the Paint Building, chromium was assumed to be in the hexavalent state. If chromium is solely in the trivalent oxidation state, the associated cancer risk is zero.

> *Additional Contingent Controls* - No additional contingent controls are required for future outdoor workers at this location. However, if future excavation or construction activities bring subsurface soils to the surface in this area, samples of these soils could be analyzed for chromium speciation to evaluate whether hexavalent chromium is actually present (and hence, whether or not the chromium actually contributes to risk). If the chromium is determined to be in hexavalent form, then it would be appropriate to consider measures to reduce workers' incidental ingestion of soil, dermal contact with soil, and inhalation of dust.

Sandblast Area, Construction Worker - For a future construction worker in the vicinity of the Sandblast Area, it was assumed that exposure could occur via incidental ingestion of soil, dermal contact with soil, inhalation of dust, and inhalation of constituents volatilizing from soil. The cancer risk was estimated to equal 1×10^{-6} and the hazard index was estimate to equal 0.1. These results indicate that there are no significant risks associated with construction in the vicinity of the Sandblast Area.

> *Additional Contingent Controls* - No additional contingent controls are required for future construction workers at this location. However, if excavation activities or construction work is planned for this area, subsurface soil samples could be analyzed for chromium speciation to evaluate whether hexavalent chromium is actually present (and hence, whether or not the chromium actually contributes to risk). If the chromium is determined to be in hexavalent form, then it would be appropriate to consider steps to reduce construction workers' incidental ingestion of soil, dermal contact with soil, and inhalation of dust (for example, through appropriate dust control measures).

4.3.4 Sump Area

Sump, Future Worker - If a building were to be constructed in the Sump Area, potential exposure pathways for a future worker would include vapor intrusion from groundwater and soil, and incidental ingestion of soil. The SRAR estimated a total cancer risk of 5×10^{-5}, while the hazard index was 2. Vapor intrusion was responsible for most of the calculated cancer risk and hazard index.

> *Additional Contingent Controls* - If a new building were planned for construction in this area, it would be appropriate to further evaluate and address the potential for vapor intrusion. Vapor mitigation, if needed, could include building design controls (e.g.,

inclusion of vapor barriers or venting systems) and/or removal of subsurface vapor sources. Additionally, it would be appropriate to consider steps to minimize workers' exposure by incidental ingestion of subsurface soils that may be exhumed in this area.

Sump, Construction Worker - It was assumed that future construction work occurred in the vicinity of the Sump. Construction workers could be exposed via incidental ingestion of soil, dermal contact with soil, inhalation of dust, and inhalation of constituents volatilizing from soil. Additional exposure pathways include incidental ingestion of groundwater and dermal contact with groundwater. The cancer risk was estimated to equal 5×10^{-7} and the hazard index was estimate to equal 0.04. These results indicate that there are no significant risks associated with construction in the vicinity of the Sump.

Additional Contingent Controls - No additional contingent controls are required for future construction workers at this location.

4.4 Enforcement

The above site management requirements shall be the responsibility of the property owner pursuant to an Environmental Covenant. A copy of the Environmental Covenant is included as Appendix B, and an associated property map with legal description are provided in Appendix C. Following approval of this Site Management Plan, the owner will file and record the Environmental Covenant, providing notice of its obligations concerning access and site management requirements on the property. Additionally, effective the date that this document is recorded in the Salt Lake County Recorder's Office, each deed, title or other instrument of conveyance conveying an interest in the property executed by the owner or its successors in title to the property shall include a notice stating that the property is subject to this Site Management Plan and shall reference the recorded location of the Site Management plan and the restrictions applicable to the property under the Site Management Plan. The above site management requirements are intended to follow title to land in perpetuity unless subsequent determinations by the DSHW or its successors indicate that the remaining level of risk on the site is sufficiently low that the site management requirements may either be reduced or eliminated in their entirety.

5.0 PROPERTY ACCESS

Upon request by DSHW, the Property Owner shall provide the DSHW representatives with access at reasonable times to the property for the purpose of monitoring and observing activities carried out under the Site Management Plan. These individuals shall conduct themselves in a safe and prudent manner in accordance with the health and safety standards of DSHW and with any additional protocols as required by the Property Owner's operations.

6.0 MONITORING REQUIREMENTS

Limited groundwater monitoring will be conducted to monitor VOC concentrations at several key monitoring wells at the site. A minimum of six rounds of groundwater monitoring will be conducted, with groundwater samples collected annually from monitoring wells T-1, T-3, T-5, and T-6. Once this data set has been collected, if the analytical results indicate that VOC concentrations are below the intersection of the 95% upper confidence limit and the corresponding MCLs for individual VOC constituents, groundwater monitoring will be complete. The property owner may also, as an option, analyze groundwater samples for additional non-VOC constituents (e.g., metals) for similar evaluation if the property owner desires to petition DSHW to modify or remove the restriction on groundwater use described in Section 4.2; however, this is not a required component of the limited groundwater monitoring.

Monitoring to ensure compliance with land use restrictions, groundwater use restrictions, and contingent exposure controls (if needed) shall be the responsibility of the Property Owner and/or its assigns. Documentation of the state of compliance with these site management requirements is to be updated annually and submitted to DSHW upon request.

7.0 PROCEDURES IF SMP REQUIREMENTS ARE BREACHED

The stated site management requirements (land use restrictions and groundwater use restrictions) provide for continued land use as an industrial facility within the acceptable risk range for such use. If and when the Property Owner and/or its assigns (Property Owner) becomes aware of a deviation from the site management plan requirements, the Property Owner shall notify DSHW within five (5) calendar days of their becoming aware of the deviation. The Property Owner will submit to DSHW a written report within 25 days, detailing the nature of the deviation and the Owner's evaluation. The Property Owner and DSHW will collectively re-evaluate whether the existing site management practices compromise the level of protection afforded by the original site management requirements and, if so, the need for alternate site management requirements will be evaluated to provide a comparable level of protection. Any proposed modification to the site management plan requirements will require DSHW approval.

8.0 REFERENCES

EarthTouch, 2013. *Limited Subsurface Investigation of an Industrial Use Property Located at 1925 West Indiana Avenue in the City of Salt Lake City, (Salt Lake County), Utah (GBGH Holdings, Inc.)* (August 2013).

Glaser, Steven L. Environmental Consulting, 2015. *Screening Risk Assessment, Former Tesco Williamsen Facility, 1925 West Indiana Avenue, Salt Lake City, Utah* (March 2015).

Salt Lake City, 2015. *West Salt Lake Zoning Map,* available at http://www.slcgov.com/planning/planning-maps

Terracon Consultants, Inc., 2014a. *Limited Site Investigation Report, Tesco Williamsen, 1925 Indiana Avenue, Salt Lake City, Utah* (March 2014).

Terracon Consultants, Inc., 2014b. *Limited Site Investigation (June 2014 Follow-up), Former Tesco Williamsen Facility, 1925 Indiana Avenue, Salt Lake City, Utah* (July 2014)

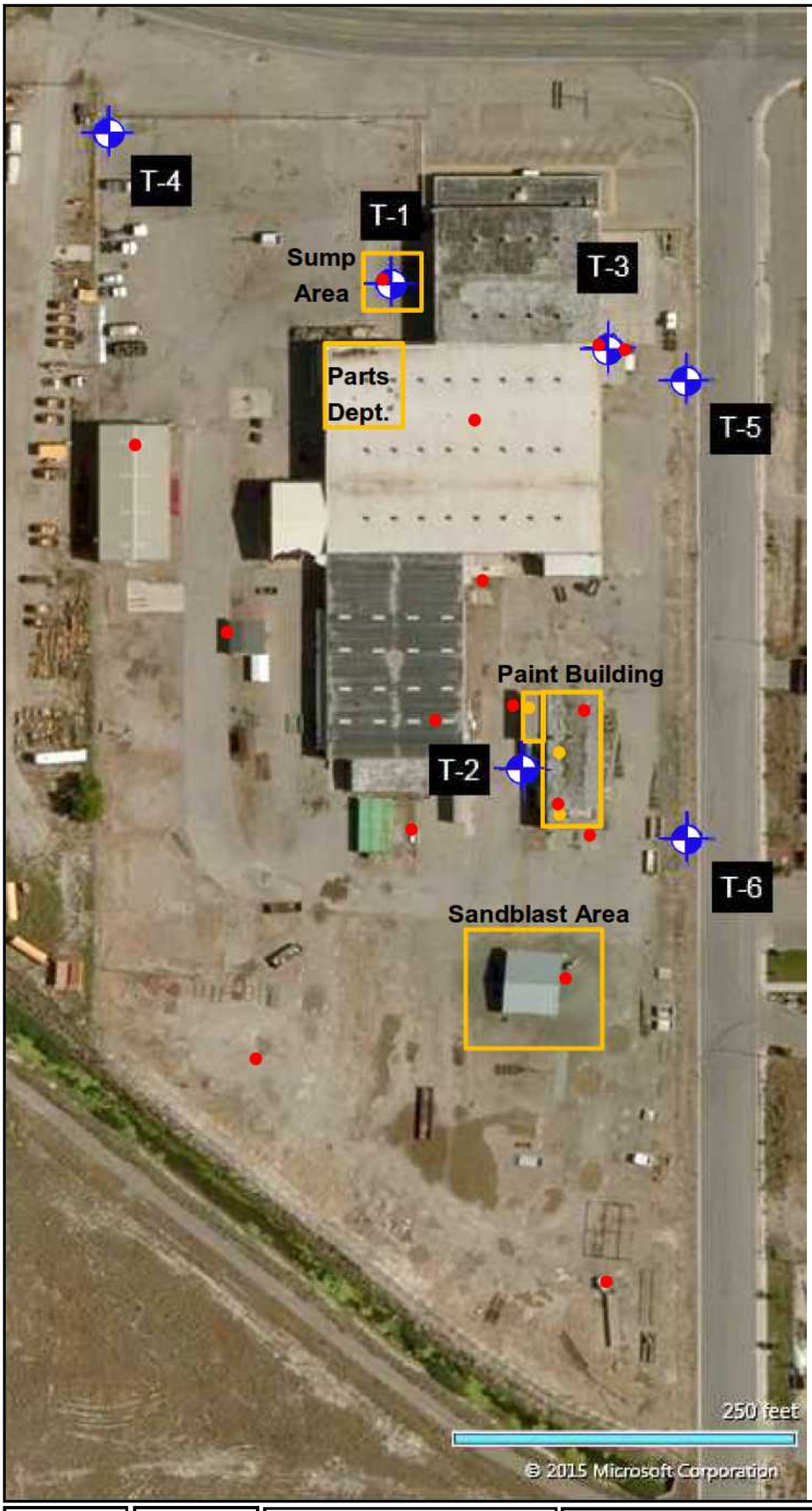
Terracon Consultants, Inc., 2015. *Memo to Steven Glaser RE: Sub-Slab Vapor Sampling at Tesco Williamsen facility* (February 20, 2015)

Utah Division of Solid and Hazardous Waste (DSHW), 2014. *Letter to Troy Hooton, GBGH Real Estate Re: Tesco Williamsen, 1925 West Indiana Avenue, Salt Lake City, Utah. UTD009093683* (October 21, 2014)

Utah Division of Solid and Hazardous Waste (DSHW), 2015. *Letter to Troy Hooton, GBGH Real Estate, LLC, Re: Tesco Williamsen Facility, 1925 West Indiana Avenue, Salt Lake City, Utah. UTD009093683* (April 15, 2015)

APPENDIX A

Exhibit 1 - Site Diagram



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Monitoring Well Location

Vapor Sample Location

Previous Sample Location by EarthTouch

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

Project Manager: ARK Drawn by: ARK Checked by: BBB Approved by: BBB	Project No. AL147009 Scale: AS SHOWN File Name: Ex 1 Date: 5/5/15	Terracon 640 E. Wilmington Ave. Salt Lake City, UT 84106	SITE DIAGRAM Former Tesco Williamsen Facility 1925 Indiana Avenue Salt Lake City, Utah	Exhibit 1

APPENDIX B

Environmental Covenant

NOTE - the Environmental Covenant will be included with the final version of the Site Management Plan following Public Comment

APPENDIX C

Property Map and Legal Description

NOTE - the Property Map and Legal Description will be included with the final version of the Site Management Plan following Public Comment