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Wealthgate Family Office, LLC
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Attn: Mr. Travis Arnold
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RE: Proposal for Remedial Action Plan Implementation and Reporting
Former Ace Auto Site
47 East 700 South, Salt Lake City, Utah
Terracon Proposal No. P61237267

Terracon Consultants, Inc. (Terracon) appreciates the opportunity to submit this proposal to assist Wealthgate Family Office, LLC (Wealthgate) with facilitating remediation of the above-referenced site through the Environmental Cleanup Program under the Utah Department of Environmental Quality (UDEQ) Division of Waste Management and Radiation Control (DWMRC). Terracon prepared a Remedial Action Plan (RAP) for the site (Remedial Action Plan, dated December 26, 2023) designed to address impacts remaining at the site after a remedial action performed in 2020. The RAP was approved by the DWMRC in a letter dated January 23, 2024.

Our proposed scope of work defined in the RAP was designed to develop a remedial action strategy that will facilitate redevelopment of the project site and comply with the DWMRC's requirements for protecting future inhabitants of the property. The proposal includes a cost for the demolition of the building for cost-estimating purposes, however, Wealthgate will contract and coordinate the demolition directly with a demolition contractor.

The following sections provide an outline of the project and Terracon's scope of services, including schedule and compensation to implement the approved RAP.

# 1.0 PROJECT INFORMATION

The former Ace Auto Site (site) consists of 0.48 acres of land located at 47 East 700 South in Salt Lake City, Utah. 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, and the eastern wall is shared with the adjoining building. Asphalt 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 hexavalent chromium 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 property owner.

Multiple investigations have been conducted at the site beginning in 2011. The investigations identified impacts to soil and groundwater related to the chrome plating operations in the form of metals and volatile organic compounds (VOCs) at concentrations that exceeded the EPA Regional Screening Levels (RSLs) and Maximum Contaminant Levels (MCLs). Chromium and hexavalent-chromium impacted soils were encountered at depths ranging from immediately below the floor slab to more than 9 feet below ground surface (bgs) in the northeastern portion of the site and extending to the south. Elevated concentrations of lead, mercury, methylene chloride, 1,2-dichlorobenzene, and 1,4-dichlorobenzene were also detected in soils and groundwater adjacent to a sump inside the building.

A RAP was developed in September 2018 (revised December 2018) by Terracon for a previous site owner. Amendments to the RAP were submitted in April and May 2020, and the RAP was approved by DWMRC on May 13, 2020. In accordance with the approved RAP, removal of chromium impacted soils was conducted in two source areas inside the building, as access allowed due the presence of an interior bearing wall located between the plating room and a sump. The excavations were terminated generally at the depth of groundwater, with the exception of the sump area, where excavation was advanced to approximately 12 feet bgs in order to remove the sump. Prior to backfill of the excavations, infiltration galleries were installed in the excavation areas as well as one on the exterior of the building in the downgradient direction to allow for injection of calcium polysulfide to treat groundwater.

Four groundwater monitoring wells were installed at the site, one within the building and the other three outside along the western property boundary for the collection of groundwater samples to document the effectiveness of the injections. Calcium polysulfide injections were gravity fed into the three infiltration galleries in two separate events on October 8, 2020, and April 15, 2021. Water flushing and injection of clean water occurred after each of these events. The March 2022 groundwater monitoring event was the fourth round of groundwater sampling conducted after the most recent injection event. Per the approved RAP, the goals stated in the RAP were a 95% reduction in field-filtered concentrations of total chromium and hexavalent chromium or concentration decreases for four consecutive sampling events with the three downgradient wells showing that other contaminants of concern were at or below EPA MCLs. Hexavalent chromium and total chromium were reduced by over 99% from pre-injection concentrations.

A Risk Evaluation was prepared by Terracon in November 2022 detailing the impacts remaining on the site post remedial action. An Environmental Covenant (EC) and Site Management Plan (SMP) were developed in November 2022 in order to properly maintain the protectiveness of the

remedial action as impacted soil and groundwater remain at the site above unrestricted land use action levels. The Risk Evaluation and SMP were developed based on the property remaining in its current state, covered by concrete and asphalt, no excavation being planned, and the on-site building remaining intact as the impacted soil remains below the building and under inaccessible areas.

It is Terracon's understanding that the current owner of the property intends to develop the site for likely mixed use (commercial at the ground level with potential residential above the commercial level). Redevelopment will require demolition of the current building. Per the SMP, such activities require the owner to re-evaluate the requirements for mitigation, engage with DWMRC regarding mitigation/remediation plans, and submit a workplan to assess risks to human health and the environment and to properly manage the excavated materials.

The 2023 RAP prepared by Terracon addresses the DWMRC requirements to address impacts remaining in soil prior to redevelopment.

# 2.0 SCOPE OF SERVICES

Chromium-impacted soils were left in-place during the previous remedial action conducted in 2020. Because of the documented environmental impacts identified at the site and the requirements of the EC and SMP placed on the property, redevelopment of the property will require additional removal of impacted soils and specific measures to address exposure risks for the proposed future development.

Residual impacts that cannot be addressed during this remedial event will be managed in-place, with risk managed through engineering and institutional controls. Environmental impacts must be addressed to the satisfaction of DWMRC for the proposed future land use.

The following Tasks outline the actions required to implement the DWMRC-approved Remedial Action Plan

## Task 1: Meeting with Client and Regulatory Agency, Work Preparation

Upon notice to proceed, Terracon will schedule a virtual meeting with the client and members of DWMRC to discuss general plans for the site, the steps that will be taken to receive a Corrective Action Complete letter and ensure that all parties agree on the overall remedial approach.

Terracon will schedule the work, coordinate subcontractors, arrange for utility locates, develop a site safety plan and coordinate completion of hazardous material manifests for the work to be conducted.

Wealthgate will pay any applicable application fees and be responsible for the DWMRC oversight fees.

Total Estimate Task 1: $4,500

## Task 2: Pre-Demolition Survey and Hazardous Waste Inventory

To assist Wealthgate in developing a final cost for demolishing the building, Terracon will conduct a pre-demolition inspection of the building to identify items required by federal, state, and/or Salt Lake County Health Department (SLCoHD) regulations to be removed prior to demolition. The inspections will identify hazardous materials requiring removal or special handling prior to demolition including asbestos, lead-containing paint, and Universal Hazardous Wastes (UHW). UHW materials may include such things as fluorescent light fixture components (lamps and PCB-ballasts); mercury-containing thermostats; chlorinated fluorocarbons (CFC)s associated with heating, ventilating, and air-conditioning (HVAC) systems; batteries; paints; solvents; etc. The following items are required to be inventoried prior to application for a demolition permit.

*Asbestos:* The inspection will include mobilizing a State of Utah-certified asbestos building inspector to conduct asbestos inspections of the building, as required by United States Environmental Protection Agency (EPA) regulation 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), and the State of Utah Department of Environmental Quality, Division of Air Quality Asbestos Rule prior to demolition.

*Lead-containing paint:* Terracon will conduct a lead paint screening inspection using a portable Niton X-ray Fluorescence (XRF) Spectrum Analyzer to provide measurements of surfaces that may contain lead at or above the detection limit of the instrument. Terracon may also collect up to four paint chip samples for lead content analysis by flame atomic absorption (FAA). The lead paint screening will be conducted to provide information regarding lead levels in painted or ceramic tiled surfaces throughout the two buildings. The screening results may be used by the demolition contractor to make decisions with respect to protection of their employees from lead exposure during future demolition activities on materials known to contain lead. The lead screening will be conducted by a Terracon inspector who is versed in the EPA, and Utah State Division of Air Quality regulations related to performing this task in the State of Utah. Terracon will collect one sample for the laboratory to perform the Toxicity Characteristic Leaching Procedure (TCLP), if needed, to determine if the buildings demolition debris will need to be disposed of as hazardous waste due to its lead content. The result of the TCLP sample will be compared to the Resource Conservation Recovery Act (RCRA) limit for lead as a hazardous waste.

*Hexavalent Chromium:* Terracon will evaluate whether walls or floors visibly stained by chromium operations may be impacted by hexavalent chromium. There is the potential that contaminated concrete may be present in the former chrome plating area. Chromium-impacted concrete requires special handling and disposal.

Terracon will collect up to eight wipe samples will be collected to evaluate the presence of hexavalent chromium on the walls prior to demolition.

*Universal Hazardous Wastes:* Terracon will conduct a hazardous material inspection of the building. Terracon will mobilize a pre-demolition building inspector, certified by the SLCoHD, who will identify, quantify, and document the existence of UHWs and other hazardous materials encountered during the inspections of the buildings. These materials may include such things as

fluorescent light fixture components (lamps and PCB-ballasts); mercury-containing thermostats; chlorinated fluorocarbons CFCs associated with heating, ventilating, and HVAC systems; batteries; paints; solvents; etc. These materials are required by the SLCoHD to be removed and properly disposed of/or recycled prior to demolition.

A written report will be submitted that includes a SLCOHD pre-demolition form filled out with a follow up SLCoHD hazardous materials disposition inspection and completed SLCoHD form as part of the demolition permit application process.

The pre-demolition hazardous materials/asbestos survey will be conducted independently of the DWMRC support activities, and only if specifically authorized by client. This pre-demolition survey will determine whether asbestos-containing materials or other hazardous materials require removal and proper disposal prior to demolition. A cost for removal and/or proper disposal of any asbestos or hazardous materials cannot be provided until after the completion of the pre-demolition survey.

Total Estimate Task 2: $8,000*

*This cost does not include removal of any hazardous items identified in the pre-demolition survey. The building is unstable and certain areas of the building are not safe to access for sampling. Some building materials may not be able to be sampled due to unsafe conditions.

## Task 3: Building Demolition

The on-site building will need to be demolished prior to any significant remediation excavation work conducted. The building is currently unstable and shares a wall and roof with the east-adjoining building. Terracon has provided this cost estimate to demolish the building for cost-estimating purposes. The property owner will contract and coordinate the demolition of the building directly with a demolition contractor.

Any materials identified as asbestos-containing or as hazardous material in the Pre-Demolition Survey will need to be properly addressed/removed/disposed prior to requesting a demolition permit from Salt Lake County. A cost to address any materials requiring action prior to demolition is not included in this proposal.

During the work, any potential contaminated concrete identified during the survey will be segregated for proper disposal.

Estimated Cost Building Demolition[1]: $190,400*

1 - The demolition of the building will be contracted directly by the property owner.

*The pre-demolition survey will determine whether asbestos-containing materials or other hazardous materials require removal and proper disposal prior to demolition. A cost for removal and/or proper disposal of any asbestos or hazardous materials cannot be provided until after the completion of the pre-demolition survey.

## Task 4: Implementation of RAP

The following Tasks outline the actions required to excavate and dispose of impacted soil and concrete.

Task 4.1 Concrete Slab and Sub-Grade Concrete Removal and Handling

The Pre-Demolition Survey will evaluate whether hexavalent chromium contaminated concrete is present in the former chrome-plating area and requires specialized handling and disposal.

It is expected that sub-grade concrete (floors, footers, walls) in the former chrome plating area may be contaminated with hexavalent chromium. Any stained or potentially contaminated concrete removed from this area will be segregated from concrete in other areas of the building, and samples will be collected from this impacted concrete for analysis of hexavalent chromium. This testing will determine whether this concrete will need to be disposed of as hazardous waste. Up to 10 samples are planned to be collected. The property owner must have an active Salt Lake City water meter and account. A source of water must be provided and paid for by the property owner.

- Contractor Mobilization and Demolition of Concrete Slab: $6,450
- Haul and Dispose of Non-Hazardous Concrete: $2,020
  Assumes up to 50 tons of non-contaminated Concrete
- Characterization and Sampling of suspect Sub-grade Concrete*: $850
  Assumes up to 10 samples
- Haul and Dispose of Contaminated/Hazardous Concrete*: $31,510
  Assumes up to 50 tons of contaminated concrete
- Terracon Coordination and Characterization Sample Collection: $7,900

Total Estimate Task 4.1: $48,730

*If required. For the purposes of this proposal and cost estimate, Terracon has assumed up to 10 concrete samples may be required to characterize the concrete for proper disposal. For the purposes of this proposal, Terracon has assumed 50 tons of concrete could be identified as hazardous material and require special handling and disposal.

Task 4.2 Soil Excavation, Waste Profiling and Disposal, Confirmation Sampling

Clean backfill that was installed in the previous excavation areas will be removed and segregated. It is assumed a significant portion of this material can be re-used as clean backfill. The previously installed infiltration gallery will also be removed in this area. Because monitoring well MW-5R will likely be destroyed during this excavation process, MW-5R will be abandoned by filling the well casing with granular bentonite prior to the start of excavation.

A Terracon technician will be on-site to visually observe the soil excavation process and the excavated soil characteristics. Characterization sampling (waste profile sample) of the impacted soil will be conducted as needed per the disposal facility requirements. Soils identified by laboratory analytical analyses as impacted but not hazardous may be transported to ET Technologies Soil Regeneration site. Soils identified by laboratory analytical analyses as impacted and hazardous will be transported to the Grassy Mountain Landfill, which is approved to accept hazardous waste. Waste manifests documenting proper transportation and disposal of the soils is required, and each hazardous manifest requires a signature by the property owner or property owner representative prior to transport.

It is not anticipated that impacted soil below the groundwater table will be excavated. The SMP and EC will address any contaminated soil left in place at depth.

Upon completion of the soil excavation, soil confirmation samples will be collected from the sidewalls and floor of the excavation. Samples will be collected at the most likely depth of contamination (normally the soil-groundwater interface) and analyzed for arsenic, cadmium, chromium, hexavalent chromium, and mercury. If concentrations of these metals report concentrations above the RSLs, the excavation will be extended and the process repeated until confirmation samples report these metals below RSLs, the property boundary has been reached, the groundwater table has been reached, or the remaining contamination cannot be accessed.

- Overburden Removal and Haul and Dispose of Impacted Soils: $434,125

  Assumes up to 450 cubic yards of hazardous waste soils

- Soil Characterization and Excavation Confirmation Analytical: $8,500

  Assumes up to 3 characterization samples and 12 confirmation samples

- Excavation Oversight and Confirmation Sample Collection: $10,000

Total Estimate Task 4.2: $452,625

Task 4.3 Excavation Backfill and Compaction

After the excavation and confirmation sampling are completed, the excavation will be backfilled and compacted. The excavation will be backfilled with clean (free of contaminants) structural fill, with the structural fill placed in approximate eight to twelve-inch lifts and compacted to 95% compaction. The original backfill material may be utilized if it is uncontaminated and meets specifications. If contaminated soil is left in place, geotextile fabric (e.g., Mirafi® 140N or equivalent) will be placed below the gravel as a marker layer. Engineered road base will be installed as needed and compacted from approximately one-foot bgs to the surface. As the site will be redeveloped, the surface will not be completed and will remain as the backfilled excavation.

Total Estimate Task 4.3: $42,700

## Task 5: RAP Implementation Report

When the work is completed, a RAP Implementation Report will be generated to document the remedial activities conducted at the site and submitted to DWMRC. The report will document the approximate location and results of sampling conducted at the site, the extent of excavations, the location of impacted materials remaining at the site, if any, backfilling documentation and testing, and the final disposal of any impacted soils removed from the site. The report will include any deviations from the RAP. The report will also include a data quality discussion for all confirmation samples collected during the RAP implementation and will provide documentation of off-site material disposal, such as weigh tickets for materials disposed of at the landfill or an estimated volume of material transported to the appropriate landfill.

Total Estimate Task 5: $10,000

## Task 6: Risk Evaluation, Site Management Plan and Environmental Covenant

If environmental impacts are to remain on the site after remediation, a Risk Evaluation of the remaining impacts will be required by the agency, as well as an Environmental Covenant (EC) and Site Management Plan (SMP). Once the remedial activities have been completed and the RAP Implementation Report has been reviewed and accepted by DWMRC, Terracon will assist the client with preparation of an EC and SMP. The EC will be recorded on the property deed and detail any activity and use limitations imposed upon the property, and the SMP will detail any operations and maintenance requirements necessary to ensure the property remains protective of human health and the environment. Legal consultation and review is recommended for the EC.

Terracon estimates a cost range for these services to be approximately $10,000 to $15,000, if required.

# 3.0 ESTIMATED SCHEDULE AND COMPENSATION

The timeframe for completion of all site work and reporting varies dependent upon the complexity of the impacts identified at the site, the need for additional investigation (if any), and the remedy proposed to remediate and mitigate the impacts.

The following specific Scope of Services outlined in this proposal will be performed for a lump sum basis:

| | |
|---|---|
| Task 1: Agency Meeting and Work Preparation: | $4,500 |
| Task 2: Pre-Demolition Survey and Hazardous Waste Inventory: | $8,000 |
| Task 3: Building Demolition[1]: | $190,400 |
| Task 4: Implementation of RAP: | $544,055* |
| Task 5: RAP Implementation Report: | $10,000 |
| Task 6: Preparation of RA, SMP and EC (if required): | $10,000-$15,000 |
| Total Estimate for Task 1 through Task 6: | $766,955 - $771,955 |

1 – The demolition of the building will be contracted directly by the property owner. This cost has been provided for budgetary purposes only.

*This proposal assumes the volumes of concrete and soil that will require disposal as a hazardous material for cost estimating purposes. If materials that require disposal are not classified as hazardous waste, they may be disposed of at a lower rate. The client will be billed for the actual rate incurred by the disposal facility.

If, as a result of these services, additional work is required outside the scope of this proposal, you will be contacted, and upon request, proposed costs for additional work will be provided. Client authorization will be obtained prior to commencement of any additional work outside the scope of this proposal.

# 4.0 CONDITIONS

The scope of services and estimated fee were based on the assumptions and limitations described in previous sections and as noted below:

- Regulatory Agency Fees: Client will be responsible for payment of all oversight fees incurred by DWMRC.

- Additional Site Characterization: Terracon cannot guarantee that the DWMRC will not require additional soil or groundwater sampling to further delineate impacts or further define impacts after the excavation of soils. This scope of work

does not include additional investigative activities that may be required by DWMRC outside of implementation of the RAP.

- Asbestos-containing and Hazardous Building Materials: It is not known if asbestos-containing materials that require remediation or hazardous materials that require disposal are present in the building. The Pre-Demolition Survey will evaluate the building materials and any actions required prior to requesting a demolition permit from Salt Lake County. A cost to remove any hazardous materials prior to demolition is not included in this proposal.

- Demolition of the Building: The property owner will contract directly with the building demolition contractor. Terracon will not provide demolition services, oversight, or bill the client for the demolition event.

- Hazardous Materials Quantities: It is not known if asbestos-containing or hazardous materials are present in the building that require removal prior to demolition. The quantities of hazardous concrete and impacted soils are not fully defined, and quantities have been assumed for cost estimating purposes. The actual quantities will be determined in the field.

- Access to Water: The property owner must have an active Salt Lake City water meter and account. A source of water must be provided and paid for by the property owner.

If any of these assumptions or conditions are not accurate or change during the project, the stated fee is subject to change. Wealthgate should contact us immediately if they are aware of any inaccuracies in these assumptions and conditions, so we may revise the proposal or fee.

# 5.0 GENERAL COMMENTS

We have attached an Agreement for Services that is incorporated into this proposal and that you must sign to authorize us to do this work. This proposal is valid for 120 days from the date of this proposal. If this proposal meets with your approval, please sign the attached Agreement for Services, and return a copy to our office via email to andrew.turner@terracon.com.

If you should have any questions or comments regarding this proposal, please contact Andrew Turner at 385-388-7028.

Sincerely,
Terracon Consultants, Inc.

Andrew Turner
Project Manager

Amy Austin
Authorized Project Reviewer