



State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF SOLID AND HAZARDOUS WASTE

Michael O. Leavitt
Governor

288 North 1460 West
P.O. Box 144880
Salt Lake City, Utah 84114-4880
(801) 538-6170 Voice
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Dianne R. Nielson, Ph.D.
Executive Director

Dennis R. Downs
Director

March 19, 1997

Richard Strehl, Vice President
Tool Design Engineering & Manufacturing
2061 West 2300 South
Salt Lake City, Utah 84119

Re: Indiana Avenue Landfill Soils Removal

Dear Mr. Strehl:

My staff has reviewed your March 4, 1997 letter regarding the Indiana Avenue Landfill (IAL) Soil Removal project. The Division of Solid and Hazardous Waste (the Division) finds the clarification on the verification procedure to be acceptable. Therefore, Tool Design may proceed with the soil removal project. The removal project needs to be coordinated with my staff, to ensure oversight of the all on-site activities. Tool Design should provide my staff with at least seven days notice before initiating any on-site activities.

On February 4, 1997, you met with Richard Rathbun of the Utah Attorney General's Office and Bill Wallner of my staff to discuss efforts related to the identification of the others soils that were alleged to have been disposed of at the IAL. Pursuant to the information and discussions at the February meeting, it is the opinion of the Division that Tool Design has made a good faith effort to locate the other soils. In addition, given that the soils were used as fill in the southern portion of the IAL and co-mingled with other fill materials, the Division will not require Tool Design to address this issue further.

If you have any questions, please contact Bill Wallner at 538-6742.

Sincerely,

Dennis R. Downs, Executive Secretary
Utah Solid and Hazardous Waste Control Board

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DRDWMWII

c: Richard Rathbun, Utah Attorney General's Office
Mary Pat Buckman, SLCCHD
Cliff Yeckes, Terracon Consultants Western, Inc.

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file: Tool Design Engineering & Manufacturing



Tool Design Engineering & Manufacturing, Inc.

September 2, 1997

Dave Fontana
Salt Lake Valley Solid Waste Management Facility
6030 West 1300 South
Salt Lake City, UT 84104

Re: Indiana Avenue Soils

Dear Mr. Fontana:

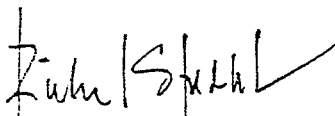
Tool Design Engineering & Manufacturing, Inc. ("TDEM") has completed the soil sampling investigation of the soil piles disposed at the Indiana Avenue Landfill in 1991.

A total of five (5) soil samples were collected from the soil piles. These samples were then combined (per your request) by the laboratory into one sample and analyzed for chromium and lead using the Toxic Characterization Leaching Procedure ("TCLP").

The laboratory analytical results indicated chromium was not detected. Lead was detected at a concentration of 0.3 mg/kg, significantly below the U.S. EPA promulgated action level of 140 mg/kg. The laboratory analytical report and chain-of-custody documentation for the soil samples are included.

TDEM would like to remove and dispose of the soils no later than October 31. Your prompt attention to and written approval would be appreciated. Should you have any questions, please contact me.

Sincerely,

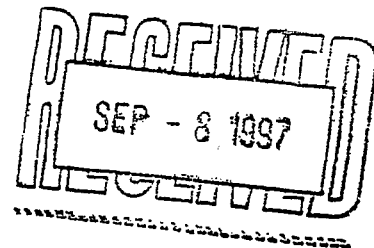


Richard Strehl
Vice President

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Enclosures

cc: Dennis R. Downs / UDEQ
William Wallner / UDEQ
Cliff Yeckes / Terracon
Jian Liu / Terracon



Terracon

CONSULTANTS WESTERN, INC.
92 West 3900 South
Suite 100
Salt Lake City, Utah 84107
Phone (801) 266-2100 Fax (801) 266-2191

March 4, 1997

Mr. Richard Strehl, Vice President
Tool Design Engineering & Manufacturing
2061 West 2300 South
Salt Lake City, Utah 84119

Re: **Indiana Avenue Landfill Soils Removal**
Terracon Project No. 61967065


Dear Mr. Strehl:

As the weather is beginning to become somewhat more favorable, we have begun planning for the removal of the soils at the above referenced site. During our lunch meeting with Bill Wallner of the Utah Department of Environmental Quality in late January, we agreed to proceed with the soils removal when the soils dried out. The soils to be removed have been identified per a report provided by Harding Lawson Associates (HLA), dated June 4, 1996.

Mr. Wallner requested that Tool Design Engineering and Manufacturing (TDEM) provide written clarification regarding verification of removal of the soils. Per our discussion and as clarification, the piles identified in the HLA report will be removed by a back-hoe/front-end loader. The soils will be excavated to approximately 1-3 inches below apparent grade (as determined visually from adjacent, non-impacted areas). Once the identified soils have been removed, two composite soil samples will be obtained as verification. The samples will be analyzed for chromium and lead using EPA Test Method 6010. Soil removal and sampling will be photo documented and a final report with appropriate disposal documentation provided.

We will begin soils removal once the soils dry out and upon final authorization from you. Please do not hesitate to contact me at 266-2100 if you have any questions or if Bill requires additional information.

Sincerely,
Terracon Consultants Western, Inc.



Cliff Yeckes, P.G., C.E.M.
Vice President, Manager
Environmental Services

COPY

cc:: Bill Wallner - UDEQ

October 8, 1997

Mr. Dave Lore
Salt Lake Valley Solid Waste Management Facility
6030 West 1300 South
Salt Lake City, Utah 84104

Terracon

CONSULTANTS WESTERN, INC.

92 West 3900 South
Suite 100
Salt Lake City, Utah 84107
Phone (801) 266-2100 Fax (801) 266-2191

Re: Indiana Landfill Soils Disposal

Via: Facsimile Transmission

Dear Mr. Lore:

Based on conversations between yourself, Mr. Rick Strehl of Tool Design Engineering & Manufacturing (TDEM) and Mr. Dan Bower of your office, Terracon is pleased to provide the additional background information requested. This information is offered pursuant to a written request for approval to dispose of soils at the Salt Lake City Solid Waste Disposal Facility Valley Landfill from TDEM to Dave Fontana dated August 8, 1997. Please note, the information requested is public record, significant additional documentation has been produced, and the Utah Department of Environmental Quality has been kept informed of all stages of this project.

In the August 8th letter TDEM requested permission to dispose of approximately 150 - 175 cubic yards (200- 240 tons) of soils at the Salt Lake City Solid Waste Facility (SLCSWF). The soils originated from the plant site and had been mixed with plant process liquids containing chromium and lead (as was described in the letter from TDEM). The soils were later disposed of at the Indiana Landfill. TDEM would like to remove these soils from the Indiana Landfill and dispose of them at the SLCSWF facility. TDEM authorized Terracon to obtain additional samples of the soil piles and analyze them for chromium and lead using the Toxic Characteristic Leaching Procedure (TCLP). The samples were combined at the laboratory to form a composite sample, representative of the soil piles. The results were submitted in a letter to Mr. Fontana on September 2. Based on the analytical results and in comparison to U.S. EPA action levels (5 mg/l TCLP lead), the soils are non hazardous.

Hopefully this information is sufficient for your requirements. We would like to remove and dispose of the soils by October 31, so your prompt attention to and written approval of this request would be appreciated. Should you have any questions, please do not hesitate to contact Rick Strehl at 972-5927 or myself at 266-2100.

COPY

Sincerely,
TERRACON



Cliff Yeckes, P.G.
Vice President

cc: Richard Strehl -TDEM
Daniel Bower - Salt Lake Valley Solid Waste Management Council
William Wallner - UDEQ
Jian Liu - Terracon

Offices of The Terracon Companies, Inc.

Arizona ■ Arkansas ■ Colorado ■ Idaho ■ Illinois ■ Iowa ■ Kansas ■ Minnesota
Missouri ■ Montana ■ Nebraska ■ Nevada ■ Oklahoma ■ Texas ■ Utah ■ Wyoming

Geotechnical, Environmental and Materials Engineers

QUALITY ENGINEERING SINCE 1965

Tool Design Engineering & Manufacturing, Inc.

VIA FACSIMILE

October 22, 1997

Gaylord Smith
Project Manager
Salt Lake City Engineer
324 S. State State, Suite 310
Salt Lake City, UT 84111

Re: Indiana Avenue Landfill Soils Reclamation Project
Fleet Design Project 650502

Dear Mr. Smith:

Per our conversation this afternoon, I am requesting permission for access to the Indiana Avenue Landfill property, located in Salt Lake City, to perform reclamation of soils improperly disposed of by the company. Please understand that the company is under court order. We have coordinated with Bill Wallner of the Department of Environmental Quality, Division of Solid & Hazardous Waste and are prepared to complete this task no later than October 31, 1997.

We would appreciate an expeditious approval. Should there be any questions or delay, please contact me.

Very truly yours,

[Handwritten Signature]
Richard Strehl

From Gaylord

Strehl
22 OCT 97
COPIES TO
+ Ron Love
+ Boyd Ferguson
+ LINDA CORDOVA
+ VAL POPE
+ KEVIN BERGSTROM
+ Jerry Lyon

CC: Richard Rathbun / Utah Attorney General's Office
Herbert Strehl
Bill Waltner / DEQ, DSHW
Cliff Yeckes / Terracon

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Ron Love + got letter to TOOL DESIGN GRANTING approval to go onsite (CITY) to REMOVE THE CONTAMINATION - GAYLORD SMITH