



State of Utah

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Department of
Environmental Quality

Kimberly D. Shelley
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DIVISION OF ENVIRONMENTAL
RESPONSE AND REMEDIATION

Brent H. Everett
Director

ERRC-028-22

February 28, 2022

Brandon Cooper
Ogden City Redevelopment Agency
2549 Washington Boulevard, Suite 420
Ogden, Utah 84401

RE: 4-C Laundromat #C115, Ogden, Weber County, Utah

Dear Mr. Cooper:

The Division of Environmental Response and Remediation (DERR) has reviewed the following document as required by the provisions of the Voluntary Cleanup Program (VCP):

- *Monitoring Well Installation and Sampling Report, January 9, 2021;*
- *Additional Monitoring Well Installation and Sampling Report, January 28, 2021;*
- *Monitoring Wells 11 to 15 Installation and Sampling Report, February 22, 2021;*
- *Monitoring Wells 16 to 20 Installation and Sampling Report, March 18, 2021;*
- *Phase 1 Environmental Site Assessment, March 19, 2021; and*
- *Monitoring Wells 21 to 25 Installation and Sampling Report, April 22, 2021.*

Collectively, these documents are considered the Environmental Assessment (EA) for the Site under the VCP. Based on a review of these documents, the DERR has enclosed technical comments to gather additional information about the Site and associated environmental conditions in advance of evaluating a remedy for the property. Please address the comments and submit a Quality Assurance Project Plan and a Site Characterization Workplan.

Thank you for your participation in the VCP. If you have any questions, please contact me at (801) 536-4100.

Sincerely,

Lincoln Grevengoed

[Lincoln Grevengoed \(Feb 28, 2022 08:11 MST\)](#)

Lincoln Grevengoed, Project Manager
Division of Environmental Response and Remediation

LG/lg

Page 2

Enclosure(s): Technical Comments

cc: Tom Atkinson, AGEC Environmental
Brian Cowan, B.S., M.P.H., Director, Weber-Morgan Health Department

**DERR Review Comments – 4-C Laundromat VCP
Environmental Assessment**

General Comments:

1. Please submit a Quality Assurance Project Plan (QAPP), ensure the QAPP addresses elements required in EPA's QAPP guidance and includes a Level 3 Reporting Package for all analytical data generated for the project. The Level 3 Reporting Package should include a case narrative, all analytical results and qualifiers, surrogates, and batch Quality Control (QC) results (Matrix Spike/Matrix Spike Duplicates, Lab Control Samples, Method Blanks, etc.). Additionally, please ensure that the laboratory reporting limits are below the proposed screening levels.
2. Analytical data in the Voluntary Cleanup Plan (VCP) is typically screened against current EPA Regional Screening Levels (RSLs), Initial Screening Levels (for TPH and TRPH), Maximum Contaminant Levels (MCLs), and Vapor Intrusion Screening Levels (VISLs). Please include these criteria in the requested documents as applicable.
3. Based on discussions, the City indicated that building demolition will be necessary as one of the first steps in the project. However, more planning and coordination is needed between DERR and the City prior to the start of demolition. To address this comment, please include the following items as part of any future demolition strategy:
 - a. A Materials Management Plan (MMP)- An MMP should include procedures to manage any chemicals, unknown containers, fluids or any other potentially hazardous materials that could be left on site after the tenants vacate the property. The MMP should include the collection and temporary storage of the materials and steps for proper disposal. Disposal documentation will need to be provided to DERR when any potentially hazardous materials are removed from the Site.
 - b. Oversight Frequency- An environmental professional (EP) should monitor the vertical demolition for unknown environmental concerns that may arise. An EP should be onsite frequently as the foundations are removed or any intrusive activities are conducted.
 - c. Health & Safety- An accordance with the Voluntary Cleanup Agreement (VCA), once the tenants leave the property, all workers on the VCP Site must have current OSHA HAZWOPER 40-Hour certification.
 - d. Onsite Coordination- Coordination between the EP and all contractors on-site is essential to ensure all procedures are followed.
 - e. Sampling Plan- Prior to removing the foundations, please include a strategy to evaluate potential discharge locations such as drains, pits, pipes (adjacent to V-1 and V-2), sumps, catch basins, staining, etc., and include confirmation sampling for areas with no evidence of impacts.
4. Prior to demolition, please include a statement verifying that assessment/abatement of regulated building materials such as light ballasts, asbestos containing material (ACM) and lead based paint (LBP), has been conducted in compliance with current rules and regulations. In addition, please provide documentation that demolition plans include a

Stormwater Pollution Prevention Plan (as applicable), Fugitive Dust Plan, measures to prevent track out and security measures to keep the site safe for the public.

5. The chlorinated solvent contamination appears to be migrating off Site. Please note that it is necessary to delineate the nature and extent of impacts emanating from the Site prior to evaluating the risk and a remedy under the VCP. Please propose further sampling to delineate the extent of chlorinated solvent contamination and to evaluate potential vapor intrusion.
6. Please conduct a water rights survey to demonstrate there are no drinking water wells within the area of the plume.
7. Please specify all utility corridors on Site.
8. The last report detailing Site characterization was received by the DERR on April 22, 2021. If any further characterization work has been conducted since, please provide the DERR with the pertinent reports.
9. Due to the duration between sampling events, please propose a current round of groundwater samples during the upcoming investigation.
10. Please keep the DERR apprised of the schedule for field work so the DERR can be on-site to oversee the work and to collect split samples. Please note that under the VCP, the DERR will collect split samples, to be analyzed at a separate laboratory from the main laboratory selected for sample analysis, as an independent quality assurance measure. The Applicant is responsible to pay for the analytical costs of the split samples. Please designate and set up a laboratory for analysis of split samples.
11. Please note that agency acceptance and a 30-day public comment period are necessary prior to implementing any proposed remedial action under the VCP. Public comments, if any, must be addressed prior to beginning a remedial action. The site should be sufficiently characterized prior to proposing a Remedial Action Plan.
12. Based on various plume maps, the concentrations around MW-12 appear to increase. Please propose further sampling as part of the future Site characterization efforts to evaluate this issue.