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Department of Environmental Quality  
Division of Waste Management and Radiation Control  
195 North 1950 West  
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Salt Lake City, Utah 84114-4880

LTD 042944975

December 29, 2015  
Project No.: 1126-001H

DSHW-2015-013087

Div of Waste Management  
and Radiation Control

JAN - 4 2016

RE: Final Site Management Plan and Environmental Covenant  
GSC Foundries  
2738 Commerce Way  
Ogden, Utah

Mr. Lauchnor,

On behalf of our client, PCC Structural (GSC Foundries), Wasatch Environmental, Inc. is submitting the attached final versions of the Site Management Plan (SMP) and Environmental Covenant (EC) for the GSC Foundries facility for the 30-day public comment period and final approval. Additionally, electronic copies of each of the documents has been sent by email. The electronic copies of both documents are in Portable Document [PDF] format and are identical to the enclosed hard copies.

Please feel free to contact us with any questions, comments, or concerns you may have regarding the GSC Foundries facility.

Best regards,



Michael Cronin, P.G.  
Senior Geologist/Project Manager

**SITE MANAGEMENT PLAN  
GSC FOUNDRIES  
OGDEN, UTAH**

**Project No. 1126-001H**

**To:**

**Mr. Brad Lauchnor  
Utah Department of Environmental Quality  
Division of Waste Management and Radiation Control  
195 North 1950 West  
P.O. Box 144880  
Salt Lake City, Utah 84114-4880**

**Prepared For:  
Wyman-Gordon Investment Castings, Inc.  
(dba GSC Foundries)  
2738 Commerce Way  
Ogden, Utah 84401**

**Prepared By:**

**Wasatch Environmental, Inc.  
2410 West California Avenue  
Salt Lake City, Utah 84104**

**December 29, 2015**

TABLE OF CONTENTS

| <u>Section</u>   | <u>Page No.</u> |
|--|-----------------|
| 1. INTRODUCTION.....   | 1               |
| 1.1 Site Description .....   | 1               |
| 1.2 Site Background.....   | 1               |
| 2. RISK ASSESSMENT AND SITE-SPECIFIC RISK-BASED SCREENING LEVELS ..... | 2               |
| 3. SITE MANAGEMENT .....   | 3               |
| 3.1 Institutional Controls.....  | 3               |
| 3.1.1 Site Management Plan .....                                       | 4               |
| 3.1.2 Steel Division Restrictions .....                                | 4               |
| 3.1.2.1 Land Use Restrictions.....                                     | 4               |
| 3.1.2.2 Vapor Intrusion Prevention .....                               | 4               |
| 3.1.3 Administration and Aluminum Division Restrictions .....          | 4               |
| 3.1.3.1 Land Use Limitations .....                                     | 4               |
| 3.1.4 Environmental Covenant .....                                     | 5               |

Tables

Table 1 – Legal Descriptions

Figures

Figure 1 – Facility Location Map

Figure 2 – Facility Parcel Map

Figure 3 – Facility Feature Map

**SITE MANAGEMENT PLAN  
GSC FOUNDRIES  
2738 COMMERCE WAY  
OGDEN, UTAH**

## **1. INTRODUCTION**

Wasatch Environmental, Inc., (Wasatch) has prepared this Site Management Plan (SMP) to present the planned long-term approach for monitoring and managing chlorinated solvent impacts to groundwater following source removal activities conducted at the subject facility. This SMP has been developed in an effort to receive "corrective action complete with controls" closure status for the facility.

This SMP has been prepared in accordance with the requirements of R315-101 "Cleanup Action and Risk-Based Closure Standards" that establishes information requirements to support risk-based cleanup and closure standards at facilities for which remediation or removal of hazardous constituents to background levels is not expected to be achieved. Except as set forth in the Environmental Covenant (EC) recorded with the Weber County Recorder's Office, the "Holder" (as defined in the EC) shall comply with the SMP. Provisions of the SMP relating to the land use limitations and vapor intrusion prevention shall be the responsibility of the "Owner" (as defined in the EC) of the property.

### **1.1 Site Description**

The GSC Foundries facility is 18.05 acres in size and consists of 13 parcels located at approximately 2738 Commerce Way in Ogden, Utah. Legal descriptions, parcel numbers, and addresses obtained from the Weber County Assessor's office are presented in Table 1. A Facility Location Map and Facility Parcel Map are presented as Figures 1 and 2, respectively.

### **1.2 Site Background**

GSC Foundries operates an investment casting, machining, and assembly facility located at 2738 Commerce Way in Ogden, Utah. GSC Foundries produces steel and aluminum parts for the aircraft industry. The facility, which started operations in 1984, includes operations that are located in five buildings in the vicinity of 2550 South and Commerce Way in Ogden, Utah (Figure 1). These buildings include the Machining and Tooling Division (2633 Commerce Way), a portion of a building used for wax reclamation and Kolene processing (2693 Commerce Way), the Aluminum Division (2710 Commerce Way), the Administration Division (2738 Commerce Way), and the Steel Division (2762 Commerce Way).

A site reconnaissance was conducted at the GSC Foundries facility in the fall of 2006 by representatives from GSC Foundries and Wasatch. The purpose of the reconnaissance was to identify areas of potential environmental concern associated with historical activities at the facility. The primary environmental concern was the former use of trichloroethene (TCE) as a degreaser at the foundry facilities and its potential to impact soil and groundwater. Beginning in early 2007, GSC Foundries discontinued using TCE as a degreaser in its operations, so references herein to the use of TCE, TCE degreasers, or immersion tanks all relate to the use of TCE prior to 2007.

Wasatch conducted several subsurface investigations at the GSC Foundries facility between 2007 and 2010. These investigations identified chlorinated solvent impacts to soil and groundwater at the facility. The primary constituent of concern identified at the GSC Foundries facility was TCE. Site investigation activities delineated the vertical and horizontal extent of soil and groundwater impacts at the facility.

Groundwater flow direction at the facility is generally west to northwestward. Analysis of soil and groundwater samples collected upgradient, downgradient, and cross-gradient of the GSC facility did not identify the presence of TCE at concentrations above laboratory detection limits, indicating that TCE was not migrating onto the GSC facility from an upgradient or cross-gradient source, and TCE is not migrating

cross-gradient or downgradient from the GSC facility, and has not impacted adjoining or adjacent properties.

The highest concentrations of TCE were identified in soil and groundwater in an area adjacent to an exterior door located on the southwest corner of the Steel Building, where mop bucket water was historically discharged. The mop bucket water reportedly contained small amounts of TCE used to clean the lunchroom floor prior to 2007. The highest concentration of TCE detected in soil was 480 µg/kg, at a depth of 2.5 feet below ground surface (bgs), in the area immediately south of the lunchroom door. The highest concentration of TCE detected in groundwater was 580 µg/L, at a depth of 15 to 25 feet bgs, also in the area immediately south of the lunchroom door. Soil and groundwater analytical results indicated decreasing concentrations of TCE with depth in this area.

A second area of TCE impacts was found beneath the Steel Building, in the area of the former TCE immersion tank. Subslab vapor samples around the immersion tank revealed TCE impacts at concentrations as high as 330,000 µg/m<sup>3</sup>. TCE was detected in the soils around the immersion tank at concentrations as high as 80 µg/kg, and was detected in the groundwater around the immersion tank at concentrations as high as 39.8 µg/L.

Minor TCE impacts to soil and groundwater were detected around the Aluminum and Administration Buildings, but these impacts do not extend beyond facility boundaries. No impacts to soil or groundwater were detected around the Machining/Tooling Building or the Wax Reclamation/Kolene Processing Building.

Based on the results of the facility investigations, Wasatch proposed a three-step approach to address the TCE impacts to soil and groundwater previously identified at the facility in the Utah Division of Solid and Hazardous Waste (currently Division of Waste Management and Radiation Control) approved July 20, 2012, Corrective Action Plan: source removal in the mop bucket discharge area, installation of soil vapor extraction (SVE) system, and long-term site monitoring.

On April 9, 2013, Wasatch personnel supervised the removal of 27.1 tons of contaminated soil adjacent to an exterior door located near the southwest corner of the Steel Building, in the area where mop bucket water was historically discharged. The U.S. Environmental Protection Agency (EPA) Regional Screening Level (RSL) for TCE in Industrial Soil was used as a screening level to guide the limits of the excavation. The excavation was approximately 11 feet wide by 10 feet long and 7 feet deep. Wasatch personnel obtained one confirmation base soil sample and four confirmation sidewall soil samples from the excavation. Based on the analytical results, which were all well below the applicable EPA RSLs for Industrial Soil, additional soil removal in the source area was not warranted. The excavation was backfilled with clean fill material, compacted, restored with a sidewalk and grass cover, and the excavated soil was disposed off-site.

The "Baseline Risk Assessment Report" documents that corrective action was not required for protection of workers at the Steel Division building.

In April 2013, Wasatch personnel supervised the installation of 20 monitoring wells across the GSC Foundries facility (see Figure 3). Wasatch conducted groundwater monitoring events in April, August, and November of 2013, and May of 2014. An additional groundwater monitoring event was conducted in April 2015. No volatile organic compounds (VOCs) have been detected in any of the groundwater samples collected from the GSC Foundries facility at concentrations exceeding current federal maximum contaminant levels (MCLs).

## **2. RISK ASSESSMENT AND SITE-SPECIFIC RISK-BASED SCREENING LEVELS**

A Human Health Risk Assessment and Protection of Groundwater Risk Assessment were submitted as Appendix F and Appendix G, respectively, in the Risk Assessment and Groundwater Data Collection Report dated April 10, 2012. A Site-Specific Risk-Based Screening Level (SSRBSL) for TCE in soil which

would be protective of groundwater to the MCL for TCE was developed in the Protection of Groundwater Risk Assessment. The SSRBSL for TCE is 30 µg/kg.

A Focused Risk Assessment (FRA) was performed as part of the investigation into environmental releases that have occurred at the site. The FRA was published as Appendix G of the Corrective Action Plan Implementation Report dated May 20, 2014. The FRA addressed releases of TCE and other VOCs to soil and groundwater.

The FRA addressed the primary factors that determine whether site management is required, potentially including corrective action. The factors addressed included whether there is a risk to human health from direct contact with soil, whether there is a potential for soil constituents to degrade groundwater quality, whether vapor intrusion from soil or groundwater could pose a significant health risk, whether there could be a risk from consuming produce grown in contaminated soil, and whether site constituents could pose a risk to wildlife.

Direct contact risks were considered by comparing site concentrations to EPA RSLs for soil. The RSLs account for incidental soil ingestion, dermal contact with soil, inhalation of dust, and inhalation of constituents volatilizing from soil. Soil concentrations in all areas of the site were less than both residential and industrial RSLs by over an order of magnitude.

The FRA concluded that a potential future vapor intrusion risk exists at the Steel Division Building in the vicinity of the former TCE immersion tank. This future risk assumes the current building is replaced with one that is smaller and more energy efficient. Measures have been included in this SMP to protect future workers against such an eventuality. Indoor air data indicate that current workers in the existing building are not at risk. The FRA determined that a TCE subslab soil vapor concentration, or SSRBSL, of 7,200 µg/m<sup>3</sup> would be protective of indoor air concentrations to the U.S. EPA RSL for Industrial Indoor Air.

In other portions of the GSC Foundries facility, no potentially significant risks, current or future, were identified for site workers. No significant risks would exist for residents at the Machining/Tooling and Wax Reclamation/Kolene Processing Division Buildings; therefore, these areas qualify for a regulatory closure status of "corrective action complete without controls." Residential risks were not evaluated for the Administration and Aluminum Division Buildings; therefore, this SMP includes restrictions to preclude residential exposure in these areas.

### 3. SITE MANAGEMENT

Based on the results of the site investigations, analytical results following completion of excavation activities, groundwater monitoring analytical data, and SSRBSLs; Wasatch proposes that the site be managed only through institutional controls.

#### 3.1 Institutional Controls

As indicated in the FRA, to achieve an estimated hazard index of 1, the subslab soil gas concentration for TCE would need to be 7,200 µg/m<sup>3</sup> or less. Because the TCE concentration in subslab soil gas was greater than 7,200 µg/m<sup>3</sup> in the area of the TCE immersion tank inside the Steel Building, as part of the corrective action at the GSC Foundries facility, the "Owner", Wyman-Gordon Investment Castings, Inc. (dba GSC Foundries), as defined in the EC, will need to comply with activity and use limitations placed on the property as outlined in the EC that will be recorded on the property with the Weber County Recorder's Office.

The following institutional controls will be placed on the property as outlined in the EC that will be recorded with the Weber County Recorder's office.

### 3.1.1 Site Management Plan

Except as specifically set forth in the EC, the Holder shall comply with the SMP submitted to the Utah Division of Hazardous Waste and Radiation Control and contained in the Administrative Record described above as it affects the property.

### 3.1.2 Steel Division Restrictions

The following restrictions apply to the Steel Division portion of the property:

#### 3.1.2.1 Land Use Restrictions

Land use at the Steel Division portion of the property is limited to commercial/industrial uses consistent with the commercial/industrial worker exposure scenario as described in the Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation, Parts A and B (EPA, 1989; 1991). The industrial/commercial worker exposure scenario is described as: exposure to adults to incidental ingestion and dermal contact to hazardous constituents for a duration of 25 years at a frequency of 250 days/year for 8 hours/day. Uses that include managed care facilities, hospitals or any type of business that would require a caretaker to reside on the Steel Division portion of the property are prohibited uses. Uses that would expose children to contaminants at the Steel Division portion of the property for extended periods of time (such as day care and school facilities) are also prohibited. Residential uses are prohibited.

#### 3.1.2.2 Vapor Intrusion Prevention

As discussed in the December 2013 FRA, corrective action is not a current required component of the SMP for worker protection for the Steel Division. Risks to current workers were estimated using indoor air samples collected from the existing building. The cancer risk was  $1 \times 10^{-6}$  and the hazard index was 0.5. Thus, risks for people currently working inside the Steel Division building are *de minimis*. Risks to future workers were also calculated, and are based on constituents volatilizing into the air of a building that is much smaller and has much less ventilation than the current building. The cancer risk to future site workers under this potential, but not anticipated, future scenario was determined to be  $1 \times 10^{-4}$  and the hazard index was 46. Therefore, in order to address the potential for vapor intrusion to future workers if a new structure is constructed in the area of the former TCE immersion tank in the Steel Division building, activities to mitigate vapor intrusion issues for the construction of a new building will be conducted. The following are examples of activities that may be conducted to mitigate vapor intrusion issues: 1) source removal, 2) installation of a vapor barrier, or 3) installation of subslab ventilation system.

### 3.1.3 Administration and Aluminum Division Restrictions

The following restrictions apply to the Administration and Aluminum Division portions of the property:

#### 3.1.3.1 Land Use Limitations

The Land Use Restrictions are the same as for the Steel Division portion of the property. Specifically, land use at the Administration and Aluminum Division portions of the property are limited to commercial/industrial uses consistent with the commercial/industrial worker exposure scenario as described in the Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation, Parts A and B. Uses that include managed care facilities, hospitals or any type of business that would require a caretaker to reside on the Administration and Aluminum Division portions of the property

are prohibited uses. Uses that would expose children to contaminants at the Administration and Aluminum Division portions of the property for extended periods of time (such as day care and school facilities) are also prohibited. Residential uses are prohibited.

**3.1.4 Environmental Covenant**

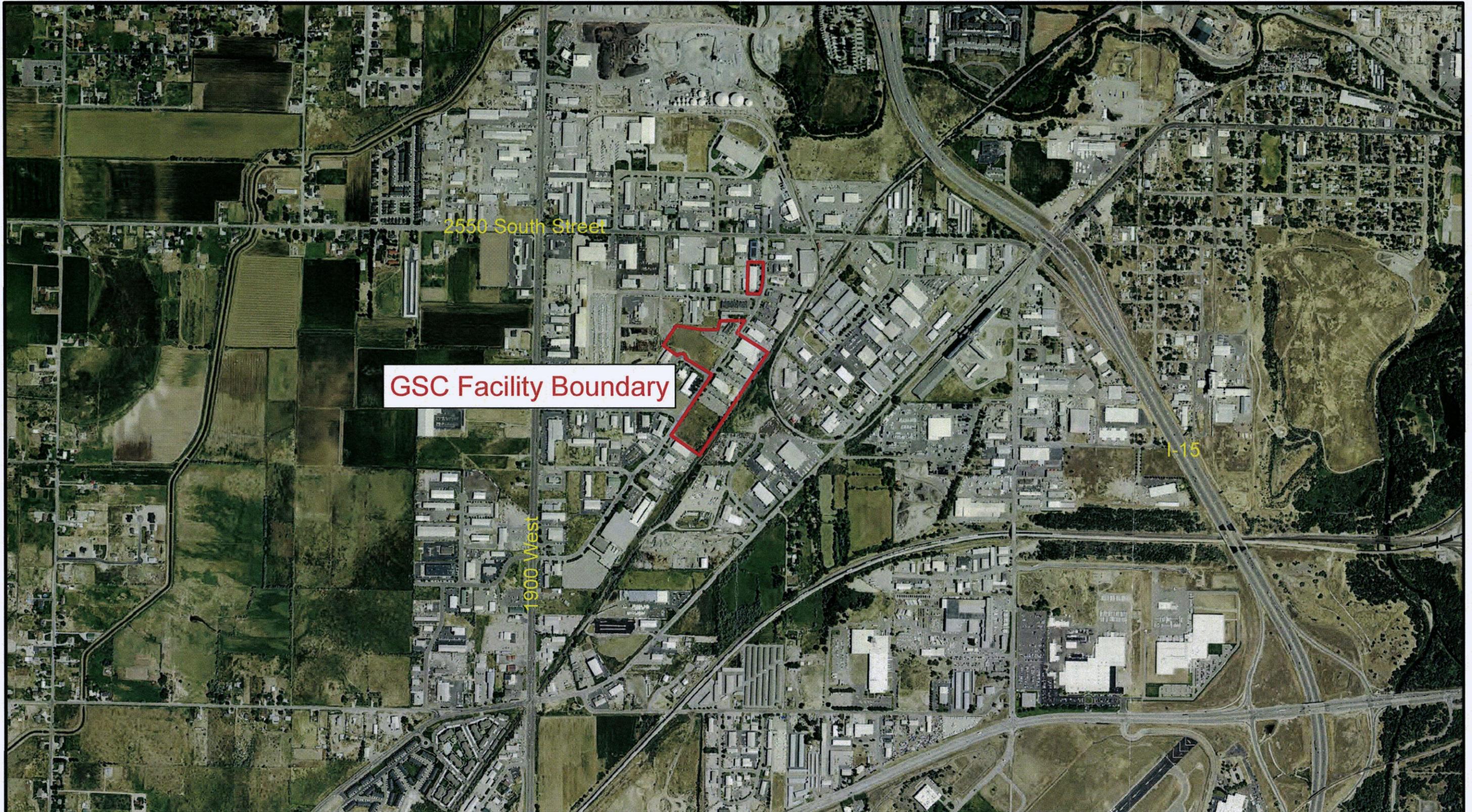
An EC containing the above referenced institutional controls, will be filed for recording in the same manner as a deed to the property, with the Weber County Recorder's Office.

Table 1  
 Legal Descriptions  
 GSC Foundries  
 Ogden, Utah  
 1126-001H

| Parcel Number      | Address  | Legal Description   | Acre/Size |
|--------------------|--|---|-----------|
| <b>VACANT LAND</b> |  |   |           |
| 15-141-0002        | 2713 Commerce Way - Lot 56                     | ALL OF LOT 56, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C," OGDEN CITY, WEBER COUNTY, UTAH.  | 1.02      |
| 15-141-0003        | Rear of 2713 Commerce Way - Lot 57             | ALL OF LOT 57, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C," OGDEN CITY, WEBER COUNTY, UTAH.  | 1.02      |
| 15-141-0004        | Rear of 2713 Commerce Way - Lot 58             | ALL OF LOT 58, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C," OGDEN CITY, WEBER COUNTY, UTAH.  | 1.71      |
| 15-162-0001        | 2820 Commerce Way - Lot 72                     | ALL OF LOT 72, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C," OGDEN CITY, WEBER COUNTY, UTAH.  | 1.99      |
| 15-162-0021        | 2820 Commerce Way - Lot 73                     | BEGINNING AT A POINT ON THE SOUTHEASTERLY RIGHT OF WAY OF LINE OF COMMERCE WAY, SAID POINT BEING NORTH 00D31'00" EAST ALONG SECTION LINE, 372.10 FEET AND SOUTH 89D09'00" EAST 1236.05 FEET TO THE SOUTHEAST CORNER OF LOT 76, OGDEN COMMERCIAL & INDUSTRIAL PARK PLAT E AS AMMENDED AND SOUTH 55D59'00" EAST 127.73 FEET TO THE SOUTHEAST CORNER OF LOT 75, OF SAID SUBDIVISION AND SOUTH 18D04'39" EAST 88.74 FEET TO THE WESTERLY CORNER OF LOT 74 OF SAID SUBDIVISION AND NORTH 34D01'00" EAST ALONG THE SOUTHEASTERLY RIGHT OF WAY LINE OF COMMERCE WAY, A DISTANCE OF 252.23 FEET FROM THE WEST QUARTER CORNER OF SECTION 36, TOWNSHIP 6 NORTH, RANGE 2 WEST, SALT LAKE BASE & MERIDIAN, AND RUNNING THENCE NORTH 34D01'00" EAST ALONG SAID RIGHT OF WAY LINE OF COMMERCE WAY 232.23 FEET TO THE NORTHERLY CORNER OF LOT 73 OF SAID SUBDIVISION, THENCE SOUTH 55D59'00" EAST ALONG THE NORTHERLY PROPERTY LINE OF SAID LOT 73 A DISTANCE OF 357.07 FEET TO THE EASTERLY CORNER OF SAID LOT 73, THENCE SOUTH 34D01'00" WEST ALONG THE NORTHERLY D&RGW RAILROAD RIGHT OF WAY LINE 232.23 FEET, THENCE NORTH 55D59'00" WEST 357.07 FEET TO THE POINT OF THE BEGINNING. | 1.90      |
| 15-141-0012        | 2,219 sq ft west of end of Wax/Kolene Building | ALL OF LOT 34-A OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C," OGDEN CITY, WEBER COUNTY, UTAH.   | 0.05      |

Table 1  
 Legal Descriptions  
 GSC Foundries  
 Ogden, Utah  
 1126-001H

| Parcel Number         | Address                               | Legal Description   | Acre/Size |
|-----------------------|---------------------------------------|---|-----------|
| <b>DEVELOPED LAND</b> |                                       |   |           |
| 15-135-0004           | 2738 Commerce Way - Admin             | ALL OF LOT 33, OGDEN COMMERCIAL & INDUSTRIAL PARK - PLAT 'B', OGDEN CITY, WEBER COUNTY, UTAH.   | 1.74      |
| 15-135-0010           | Rear of 2738 Commerce Way Vacant Land | PART OF THE NORTHWEST QUARTER OF SECTION 36, TOWNSHIP 6 NORTH, RANGE 2 WEST, SALT LAKE CITY BASE & MERIDIAN, U.S. SURVEY. ALSO A PART OF THE OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "B". BEGINNING AT 480.0 FEET; THENCE SOUTH 55D59' EAST 40.0 FEET TO THE WEST RIGHT OF WAY LINE OF THE DENVER & RIO GRANDE WESTERN RAILROAD; THENCE ALONG SAID RIGHT OF WAY LINE NORTH 34D01' EAST 480.0 FEET; THENCE NORTH 55D59' WEST 40.0 FEET TO THE POINT OF BEGINNING. CONTAINING 0.44 ACRES | 0.44      |
| 15-134-0011           | 2633 Commerce Way - Machining         | ALL OF LOT 39, OGDEN COMMERCIAL & INDUSTRIAL PARK - PLAT 'B', OGDEN CITY, WEBER COUNTY, UTAH.   | 1.02      |
| 15-135-0003           | 2710 Commerce Way - Aluminum          | ALL OF LOT 32, OGDEN COMMERCIAL & INDUSTRIAL PARK - PLAT 'B', OGDEN CITY, WEBER COUNTY, UTAH.   | 1.74      |
| 15-430-0001           | 2693 Commerce Way - Training          | ALL OF LOT 34, OGDEN COMMERCIAL & INDUSTRIAL PARK - PLAT 'B' AMENDED, OGDEN CITY, WEBER COUNTY, UTAH.   | 1.18      |
| 15-141-0001           | 2701 Commerce Way - Parking Lot       | ALL OF LOT 55, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C," OGDEN CITY, WEBER COUNTY, UTAH.  | 0.92      |
| 15-141-0008           | 2762 Commerce Way - Steel             | BEGINNING AT THE MOST WESTERLY CORNER OF LOT 63, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C", AND RUNNING THENCE SOUTH 55D59' EAST 357.07 FEET TO THE MOST SOUTHERLY CORNER OF SAID LOT 63; THENCE NORTH 34D01' EAST 407.11 FEET TO THE MOST EASTERLY CORNER OF LOT 62, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C"; THENCE NORTH 55D59' WEST 357.07 FEET TO THE MOST NORTHERLY CORNER OF SAID LOT 62; THENCE SOUTH 34D01' WEST 407.11 FEET TO THE POINT OF BEGINNING.                | 3.32      |

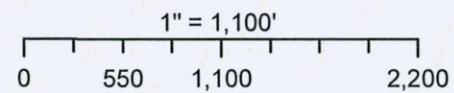


**GSC Facility Boundary**

2550 South Street

1900 West

I-15

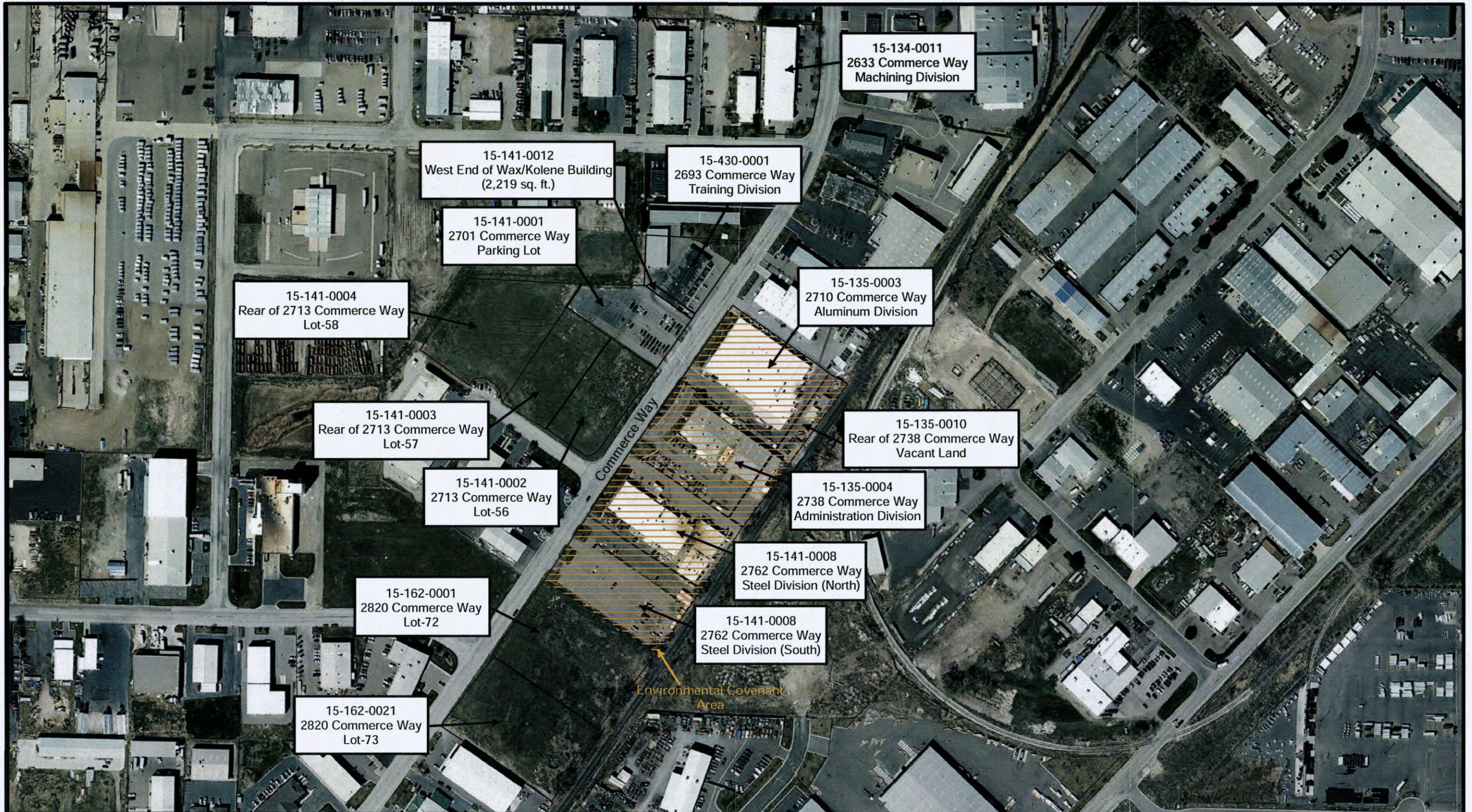


Environmental Science and Engineering

**FACILITY LOCATION MAP**

GSC Foundries  
2738 Commerce Way  
Ogden, Utah

| PROJECT NO. | DRAWING DATE | FIGURE |
|-------------|--------------|--------|
| 1126-001H   | May 1, 2015  | 1      |



1" = 240'

0 120 240 480

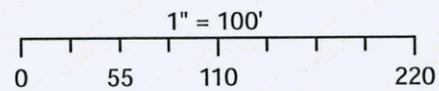


Environmental Science and Engineering

FACILITY PARCEL MAP

GSC Foundries  
2738 Commerce Way  
Ogden, Utah

| PROJECT NO. | DRAWING DATE      | FIGURE |
|-------------|-------------------|--------|
| 1126-001H   | September 8, 2015 | 2      |



 Monitoring Well



Environmental Science and Engineering

FACILITY FEATURE MAP

GSC Foundries  
2738 Commerce Way  
Ogden, Utah

| PROJECT NO. | DRAWING DATE | FIGURE |
|-------------|--------------|--------|
| 1126-001H   | May 1, 2015  | 3      |

To be recorded with County Recorder—  
Utah Code Ann. § 57-25-108

When Recorded Return To:  
Christopher Myers, Global Director  
Environmental Health and Safety (EHS)  
PCC Structural  
4600 South East Harney Drive  
Portland OR, 97206-0898

With Copy To:  
Scott T. Anderson, Director  
Utah Division of Waste Management and Radiation Control  
P.O. Box 144880  
Salt Lake City, UT 84114-4880

### ENVIRONMENTAL COVENANT

1. This Environmental Covenant is entered into by Wyman-Gordon Investment Castings, Inc., ("Owner") and the Director, Utah Division of Waste Management and Radiation Control (Director), pursuant to Utah Code Ann. §§ 57-25-101 et seq., for the purpose of subjecting the Property described in Paragraph 2 to the activity and use limitations set forth herein.

### PROPERTY

2. The property encumbered by this environmental covenant are parcels 15-135-004 (2738 Commerce Way), 15-135-0010 (2738 Commerce Way, rear portion of lot), 15-135-0003 (2710 Commerce Way), and 15-141-0008 (2762 Commerce Way); which are a portion of the parcels occupied by GSC Foundries facility located in Ogden, Utah. The legal descriptions of the parcels affected by this environmental covenant are:

15-135-0004 (2738 Commerce Way)

ALL OF LOT 33, OGDEN COMMERCIAL & INDUSTRIAL PARK - PLAT 'B', OGDEN CITY, WEBER COUNTY, UTAH.

15-135-0010 (2738 Commerce Way, rear portion of lot)

PART OF THE NORTHWEST QUARTER OF SECTION 36, TOWNSHIP 6 NORTH, RANGE 2 WEST, SALT LAKE CITY BASE & MERIDIAN, U.S. SURVEY. ALSO A PART OF THE OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "B". BEGINNING AT 480.0 FEET; THENCE SOUTH 55D59' EAST 40.0 FEET TO THE WEST RIGHT OF WAY LINE OF THE DENVER & RIO GRANDE WESTERN RAILROAD; THENCE ALONG SAID RIGHT OF WAY LINE NORTH 34D01' EAST 480.0 FEET; THENCE NORTH 55D59' WEST 40.0 FEET TO THE POINT OF BEGINNING. CONTAINING 0.44 ACRES

15-135-0003 (2710 Commerce Way)

ALL OF LOT 32, OGDEN COMMERCIAL & INDUSTRIAL PARK - PLAT 'B', OGDEN CITY, WEBER COUNTY, UTAH.

15-141-0008 (2762 Commerce Way)

BEGINNING AT THE MOST WESTERLY CORNER OF LOT 63, OGDEN COMMERCIAL & INDUSTRIAL PARK, PLAT "C", AND RUNNING THENCE SOUTH 55D59' EAST 357.07 FEET TO THE MOST SOUTHERLY CORNER OF SAID LOT 63; THENCE NORTH 34D01' EAST 407.11 FEET TO THE MOST EASTERLY CORNER OF LOT 62, OGDEN COMMERCIAL & INDUSTRIALPARK, PLAT "C"; THENCE NORTH 55D59' WEST 357.07 FEET TO THE MOST NORTHERLY CORNER OF SAID LOT 62; THENCE SOUTH 34D01' WEST 407.11 FEET TO THE POINT OF BEGINNING.

**ENVIRONMENTAL RESPONSE PROJECT**

3. The Environmental Response Project is referred to as GSC Foundries, 2738 Commerce Way, Ogden, Utah. The Environmental Response Project is also referenced as Wasatch Environmental (Wasatch) Project Number 1126-001. The project administrative records are maintained and managed by the Division of Waste Management and Radiation Control, the Records Center or State Archives, in accordance with the Division's Documents Retention Schedule, and is referenced by Facility Identification Number UT042944975. Paragraphs 4 through 18 summarize the investigations conducted to delineate the extent of soil and groundwater contamination at the site, as well as the remedial efforts conducted at the site. More detail about the remedial work performed at the site is available in the administrative record.

4. GSC Foundries is an industrial facility located west of interstate highway I-15, approximately ¼-mile south of the intersection of 2550 South and Commerce Way in Ogden, Utah (as depicted on Figure 1 of Appendix A, attached hereto). The GSC Foundries facility consists of 13 parcels occupying a total of 18.05 acres as depicted on Figure 2 of Appendix A). Only the parcels list above in paragraph 2 are subject to the conditions of this Environmental Covenant.

5. A site reconnaissance was conducted at the GSC Foundries facility in the fall of 2006 to identify areas of potential environmental concern associated with historical activities at the facility. The primary environmental concern was the former use of trichloroethene (TCE) as a degreaser at the foundry facilities and its potential to impact soil and groundwater. Beginning in early 2007, GSC Foundries discontinued using TCE as a degreaser in its operations, so references herein to the use of TCE, TCE degreasers, or immersion tanks all relate to the use of TCE prior to 2007.

6. Subsurface investigations at the GSC Foundries facility were conducted between 2007 and 2010. These investigations identified chlorinated solvent impacts to soil and groundwater at the facility. The primary constituent of concern identified at the GSC Foundries facility was TCE. Site investigation activities delineated the vertical and horizontal extent of soil and groundwater impacts at the facility.

7. Groundwater flow direction at the facility is generally west to northwestward. Analysis of soil and groundwater samples collected upgradient, downgradient, and cross-gradient of the GSC Foundries facility did not identify the presence of TCE at concentrations above laboratory detection limits, indicating that TCE was not migrating onto the GSC facility from an upgradient or cross-gradient source, TCE is not migrating cross-gradient or downgradient from the GSC Foundries facility, and has not impacted adjoining or adjacent properties.

8. The highest concentrations of TCE were identified in soil and groundwater in an area adjacent to an exterior door located on the southwest corner of the Steel Building, where mop bucket water was historically discharged. The mop bucket water reportedly contained small amounts of TCE used to clean the lunchroom floor prior to 2007. The highest concentration of TCE detected in soil was 480 µg/kg, at a depth of 2.5 feet below ground surface (bgs), in the area immediately south of the lunchroom door. The highest concentration of TCE detected in groundwater was 580 µg/L, at a depth of

15 to 25 feet bgs, also in the area immediately south of the lunchroom door. Soil and groundwater analytical results indicated decreasing concentrations of TCE with depth in this area.

9. A second area of TCE impacts was found beneath the Steel Building, in the area of the former TCE immersion tank. Subslab vapor samples around the immersion tank revealed TCE impacts at concentrations as high as 330,000  $\mu\text{g}/\text{m}^3$ . TCE was detected in the soils around the immersion tank at concentrations as high as 80  $\mu\text{g}/\text{kg}$ , and was detected in the groundwater around the immersion tank at concentrations as high as 39.8  $\mu\text{g}/\text{L}$ .

10. Minor TCE impacts to soil and groundwater were detected around the Aluminum and Administration Buildings, but these impacts do not extend beyond facility boundaries. No impacts to soil or groundwater were detected around the Machining/Tooling Building or the Wax Reclamation/Kolene Processing Building.

11. A three-step approach to address the TCE impacts to soil and groundwater previously identified at the facility is described in the Utah Division of Solid and Hazardous Waste (currently Division of Waste Management and Radiation Control) approved July 20, 2012, Corrective Action Plan: source removal in the mop bucket discharge area, installation of soil vapor extraction (SVE) system, and long-term site monitoring.

12. On April 9, 2013, 27.1 tons of contaminated soil was removed from the area adjacent to an exterior door located near the southwest corner of the Steel Building, where mop bucket water was historically discharged. The U.S. Environmental Protection Agency (EPA) Regional Screening Level (RSL) for TCE in Industrial Soil was used as a screening level to guide the limits of the excavation. The excavation was approximately 11 feet wide by 10 feet long and 7 feet deep. Confirmation soil samples were collected from the floor and sidewalls of the excavation. Based on the analytical results, which were all well below the applicable EPA RSLs for Industrial Soil, additional soil removal in the source area was not warranted. The excavation was backfilled with clean fill material, compacted, restored with a sidewalk and grass cover, and the excavated soil was disposed off-site.

13. The "Baseline Risk Assessment Report" documented that corrective action was not required for protection of workers at the Steel Division building.

14. In April 2013, 20 monitoring wells were installed at strategic locations at the GSC Foundries facility. Groundwater monitoring events were conducted in April, August, and November of 2013, May of 2014, and May of 2015. No volatile organic compounds (VOCs) have been detected in any of the groundwater samples collected from the GSC Foundries facility at concentrations exceeding current federal maximum contaminant levels (MCLs).

15. A Human Health Risk Assessment and Protection of Groundwater Risk Assessment were submitted as Appendix F and Appendix G, respectively, in the Risk Assessment and Groundwater Data Collection Report dated April 10, 2012. A Site-Specific Risk-Based Screening Level (SSRBSL) for TCE in soil which would be protective of groundwater to the federal MCL for TCE was developed in the Protection of Groundwater Risk Assessment. The SSRBSL for TCE is 30  $\mu\text{g}/\text{kg}$ .

16. A Focused Risk Assessment (FRA) was performed as part of the investigation into environmental releases that have occurred at the site. The FRA was published as Appendix G of the Corrective Action Plan Implementation Report dated May 20, 2014. The FRA addressed releases of TCE and other VOCs to soil and groundwater.

17. The FRA concluded that a potential future vapor intrusion risk exists at the Steel Division Building in the vicinity of the former TCE immersion tank. This future risk assumes the current building is replaced with one that is smaller and more energy efficient. Measures have been included in the Site Management Plan (SMP) to protect future workers against such an eventuality. Indoor air data indicate that current workers in the existing building are not at risk. The FRA determined that a TCE subslab soil

vapor concentration, or SSRBSL, of 7,200 µg/m<sup>3</sup> would be protective of indoor air concentrations to the U.S. EPA RSL for Industrial Indoor Air.

18. In other portions of the GSC Foundries facility, no potentially significant risks, current or future, were identified for site workers. No significant risks would exist for residents at the Machining/Tooling and Wax Reclamation/Kolene Processing Division Buildings; therefore, these areas qualify for a regulatory closure status of "corrective action complete without controls." Residential risks were not evaluated for the Administrative and Aluminum Division Buildings.

## COVENANT

19. Now therefore, Wyman-Gordon Investment Castings, Inc., and the Director agree to the following:

20. Environmental Covenant. This instrument is an environmental covenant developed and executed pursuant to Utah Code Ann. §§57-25-101 et. seq.

21. Property: This Environmental Covenant concerns four (4) parcels which are part of the GSC Foundries facility: parcel number 15-135-004 located at 2738 Commerce Way consisting of approximately 1.74 acres of real property, parcel number 15-135-0010 located at 2738 Commerce Way (rear portion of the lot) consisting of approximately 0.44 acres of real property, parcel number 15-135-0003 located at 2710 Commerce Way consisting of approximately 1.74 acres of real property, and parcel number 15-141-0008 located at 2762 Commerce Way consisting of approximately 3.32 acres of real property; owned by Wyman-Gordon Investment Castings, Inc. The legal descriptions of these properties are provided in Paragraph 2 above.

22. Owner. Wyman-Gordon Investment Castings, Inc., is the owner of the Property and is located at 4600 SE Harney Drive, Portland, Oregon. Consistent with Paragraph 25 ("Running with the Land") of this Environmental Covenant, the obligations of the Owner are imposed on assigns and successors in interest, including any Transferee. The term "Transferee" as used in this Environmental Covenant, includes the future of any interest in the Property or any portion thereof, including, but not limited to, owners of an interest in fee simple, mortgagees, easement holders, or lessees.

23. Holder. Owner, whose address is listed above, and which is located at 4600 SE Harney Drive, Portland, Oregon is the holder of this Environmental Covenant.

24. Activity Use and Limitations: As part of the SMP, Owner hereby imposes and agrees to comply with the following activity and use limitations:

**A. Steel Division Restrictions: Apply to parcel number 15-141-0008.**

- a. The Land use at the Steel Division are limited to commercial/industrial uses consistent with the commercial/industrial worker exposure scenario as described in the Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation, Parts A and B. Uses that include managed care facilities, hospitals or any type of business that would require a caretaker to reside on the Steel Division portion of the property are prohibited uses. Uses that would expose children to contaminants at the Steel Division portion of the property for extended periods of time (such as day care and school facilities) are prohibited. Residential uses are prohibited.
- b. As discussed in the December 2013 FRA, corrective action is not a current required component of the SMP for worker protection for the Steel Division. Risks to current workers were estimated using indoor air samples collected from the existing building. The cancer risk was  $1 \times 10^{-6}$  and the hazard index was 0.5. Thus, risks for people currently working inside the Steel Division building are *de minimis*. Risks to future

workers were also calculated, and are based on constituents volatilizing into the air of a building that is much smaller and has much less ventilation than the current building. The cancer risk to future site workers under this potential, but not anticipated, future scenario was determined to be  $1 \times 10^{-4}$  and the hazard index was 46. Therefore, in order to address the potential for vapor intrusion to future workers if a new structure is constructed in the area of the former TCE immersion tank in the Steel Division building, activities to mitigate vapor intrusion issues for the construction of a new building will be conducted. The following are examples of activities that may be conducted to mitigate vapor intrusion issues: 1) source removal, 2) installation of a vapor barrier, or 3) installation of subslab ventilation system.

**B. Administration and Aluminum Division Restrictions: Apply to parcel numbers 15-135-0004, 15-135-0010, and 15-135-0003.**

- a. The Land Use Restrictions are the same as for the Steel Division portion of the property. Specifically, land use at the Administration and Aluminum Division portions of the property are limited to commercial/industrial uses consistent with the commercial/industrial worker exposure scenario as described in the Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation, Parts A and B. Uses that include managed care facilities, hospitals or any type of business that would require a caretaker to reside on the Administration and Aluminum Division portions of the property are prohibited uses. Uses that would expose children to contaminants at the Administration and Aluminum Division portions of the property for extended periods of time (such as day care and school facilities) are also prohibited. Residential uses are prohibited.
- b. Other than the restrictions listed in paragraph a., there are no additional limitations or restrictions.

25. Running with the Land: This Environmental Covenant shall be binding upon the Owner[s] and all assigns and successors in interest, including any Transferee, and shall run with the land, pursuant to Utah Code Ann. § 57-25-105, subject to amendment or termination as set forth herein. The term "Transferee," as used in this Environmental Covenant, shall mean any future owner of any interest in the Property or any portion thereof, including, but not limited to, owners of an interest in fee simple, mortgagees, easement holders, and/or lessees.

26. Compliance Enforcement. Compliance with this Environmental Covenant may be enforced pursuant to Utah Code Ann. § 57-25-111. Failure to timely enforce compliance with this Environmental Covenant or the activity and use limitations contained herein by any party shall not bar subsequent enforcement by such party and shall not be deemed a waiver of the party's right to take action to enforce any non-compliance. Nothing in this Environmental Covenant shall restrict the Director from exercising any authority under applicable law.

27. Rights of Access. Owner hereby grants to the Director, its agents, contractors, and employees the right of access to the Property for implementation or enforcement of this Environmental Covenant, subject to the constitutional limitation on warrantless searches and seizures. Nothing in this Environmental Covenant shall be construed as limiting or expanding any access and inspection authorities of the Director under State law.

28. Notice Upon Conveyance. Each instrument hereafter conveying any interest in the Property or any portion of the Property shall contain a notice of the activity and use limitations set forth in this Environmental Covenant, and provide the recorded location of this Environmental Covenant. The notice shall be substantially in the following form:

THE INTEREST CONVEYED HEREBY IS SUBJECT TO AN ENVIRONMENTAL COVENANT, DATED \_\_\_\_\_, 201\_, RECORDED IN THE DEED OR OFFICIAL RECORDS OF THE \_\_\_\_\_ COUNTY RECORDER ON \_\_\_\_\_, 201\_, IN

[DOCUMENT \_\_\_\_, or BOOK \_\_\_\_, PAGE \_\_\_\_]. THE LANGUAGE OF PARAGRAPH 26(A) OF THE ENVIRONMENTAL COVENANT (ACTIVITY AND USE LIMITATIONS) IS INCORPORATED HEREIN VERBATIM BY REFERENCE.

Owners shall notify the Director within ten (10) days after each conveyance of an interest in any portion of the Property. Owner's notice shall include the name, address, and telephone number of the Transferee, a copy of the deed or other documentation evidencing the conveyance, and an unsurveyed plat that shows the boundaries of the property being transferred.

29. Representations and Warranties. Owner hereby represents and warrants to the other signatories hereto:

- A. That the Owner is the sole owner of the Property;
- B. That the Owner holds fee simple title to the Property which is free, clear, and unencumbered;
- C. That the Owner has identified all other persons that own an interest in or hold an encumbrance on the Property and notified such persons of the Owner's intention to enter into this Environmental covenant; and
- D. That this Environmental Covenant will not materially violate or contravene or constitute a material default under any other agreement, document, or instrument to which the Owner is a party or by which the Owner may be bound or affected; and
- E. That the Owner has the power and authority to enter into this Environmental Covenant, to grant the rights and interests herein provided and to carry out all obligations hereunder.

30. Amendment or Termination. This Environmental Covenant may be amended or terminated by written consent of all of the following: the Owner or a Transferee, and the Director, pursuant to Utah Code Ann. § 57-25-110 and other applicable law. The term "Amendment" as used in this Environmental Covenant shall mean any changes to the Environmental Covenant, including the activity and use limitations set forth herein, or the elimination of one or more activity and use limitations when there is at least one limitation remaining. The term "Termination" as used in this Environmental Covenant, shall mean the elimination of all activity and use limitations set forth herein and all other obligations under this Environmental Covenant.

31. Severability. If any provision of this Environmental Covenant is found to be unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions shall not in any way be affected or impaired.

32. Governing Law. This Environmental Covenant shall be governed by and interpreted in accordance with the laws of the State of Utah.

33. Recordation. Within thirty (30) days after the date of the final required signature upon this Environmental Covenant, Owner[s] shall file this Environmental Covenant for recording, in the same manner as a deed to the Property, with the Weber County Recorder's Office.

34. Effective Date. The effective date of this Environmental Covenant shall be the date upon which the fully executed Environmental Covenant has been recorded as a document of record for the Property with the Weber County Recorder.

35. Distribution of Environmental Covenant. The Owner shall distribute a file-and date-stamped copy of the recorded Environmental Covenant to Director within thirty days of recordation.

36. Notice. Unless otherwise notified in writing by or on behalf of the current owner or the Director, any document or communication required by this Environmental Covenant shall be submitted to:

Mr. Scott T. Anderson, Director  
Utah Division of Waste Management and Radiation Control  
P.O. Box 144880  
Salt Lake City, Utah 84114-4880

The undersigned Owner and Holder represent and certify that they are authorized to execute this Environmental Covenant.

**IT IS SO AGREED:**

Wyman-Gordon Investment Castings, Inc.

\_\_\_\_\_  
Signature of Owner[s]

\_\_\_\_\_  
Printed Name and Title

\_\_\_\_\_  
Date

State of \_\_\_\_\_ )

) ss:

County of \_\_\_\_\_ )

Before me, a notary public, in and for said county and state, personally appeared \_\_\_\_\_, a duly authorized representative of \_\_\_\_\_, who acknowledged to me that [he/she] did execute the foregoing instrument on behalf of \_\_\_\_\_.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed my official seal this day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public

Division of Waste Management and Radiation Control

\_\_\_\_\_  
Scott T. Anderson, Director

\_\_\_\_\_  
Date

State of Utah )  
County of Salt Lake ) ss: \_\_\_\_\_

Before me, a notary public, in and for said county and state, personally appeared Scott T. Anderson, Director of the Division of Waste Management and Radiation Control, who acknowledged to me that he did execute the foregoing instrument.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed my official seal this day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public

Wyman-Gordon Investment Castings, Inc.

\_\_\_\_\_  
Signature of Holder

\_\_\_\_\_  
Printed Name and Title

\_\_\_\_\_  
Date

State of \_\_\_\_\_ )  
County of \_\_\_\_\_ ) ss: \_\_\_\_\_

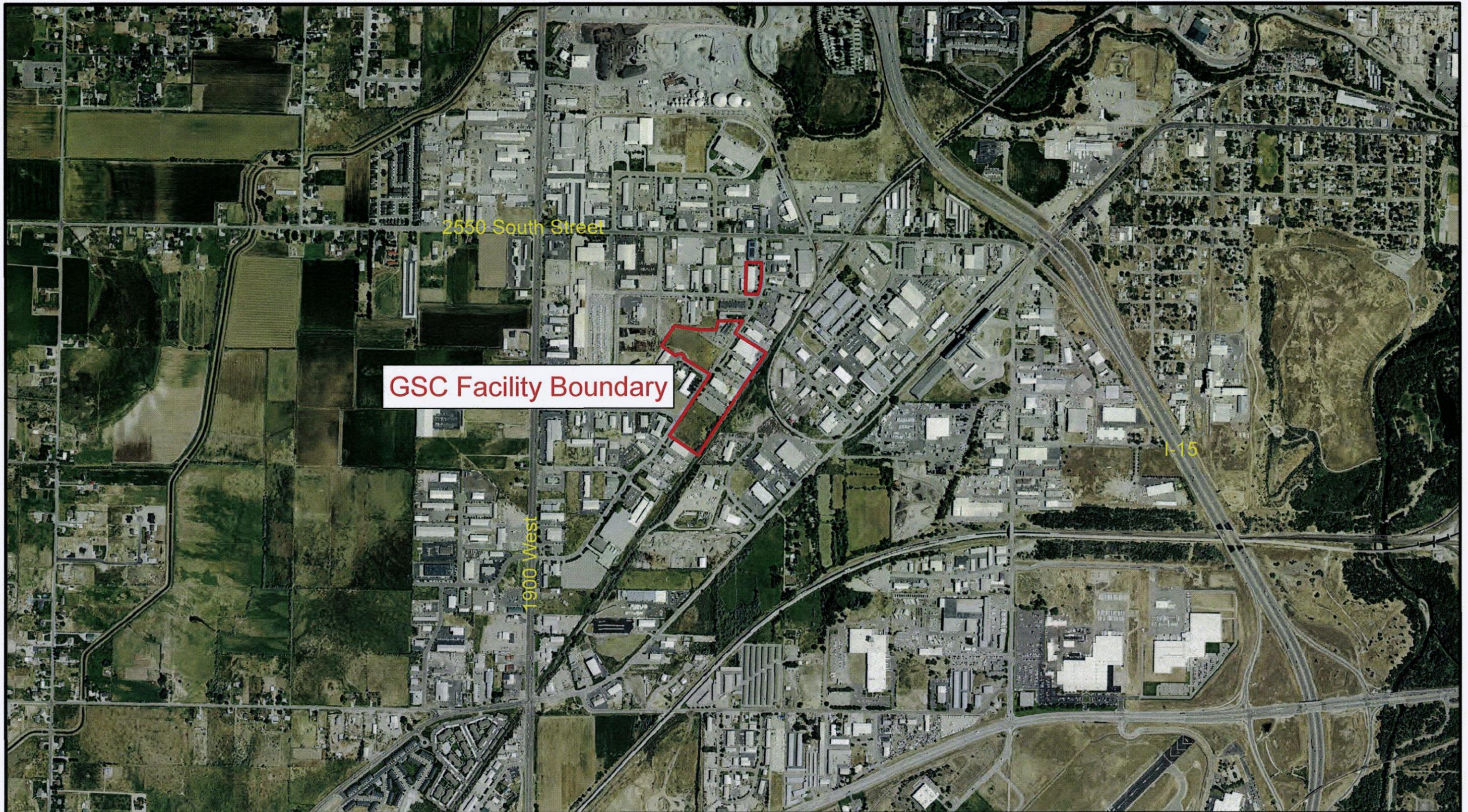
Before me, a notary public, in and for said county and state, personally appeared \_\_\_\_\_, a duly authorized representative of \_\_\_\_\_, who acknowledged to me that [he/she] did execute the foregoing instrument on behalf of \_\_\_\_\_.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed my official seal this day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public

This instrument prepared by:

Wasatch Environmental, Inc.  
2410 West California Avenue  
Salt Lake City, UT 84104

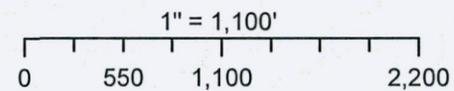


**GSC Facility Boundary**

2550 South Street

1900 West

I-15

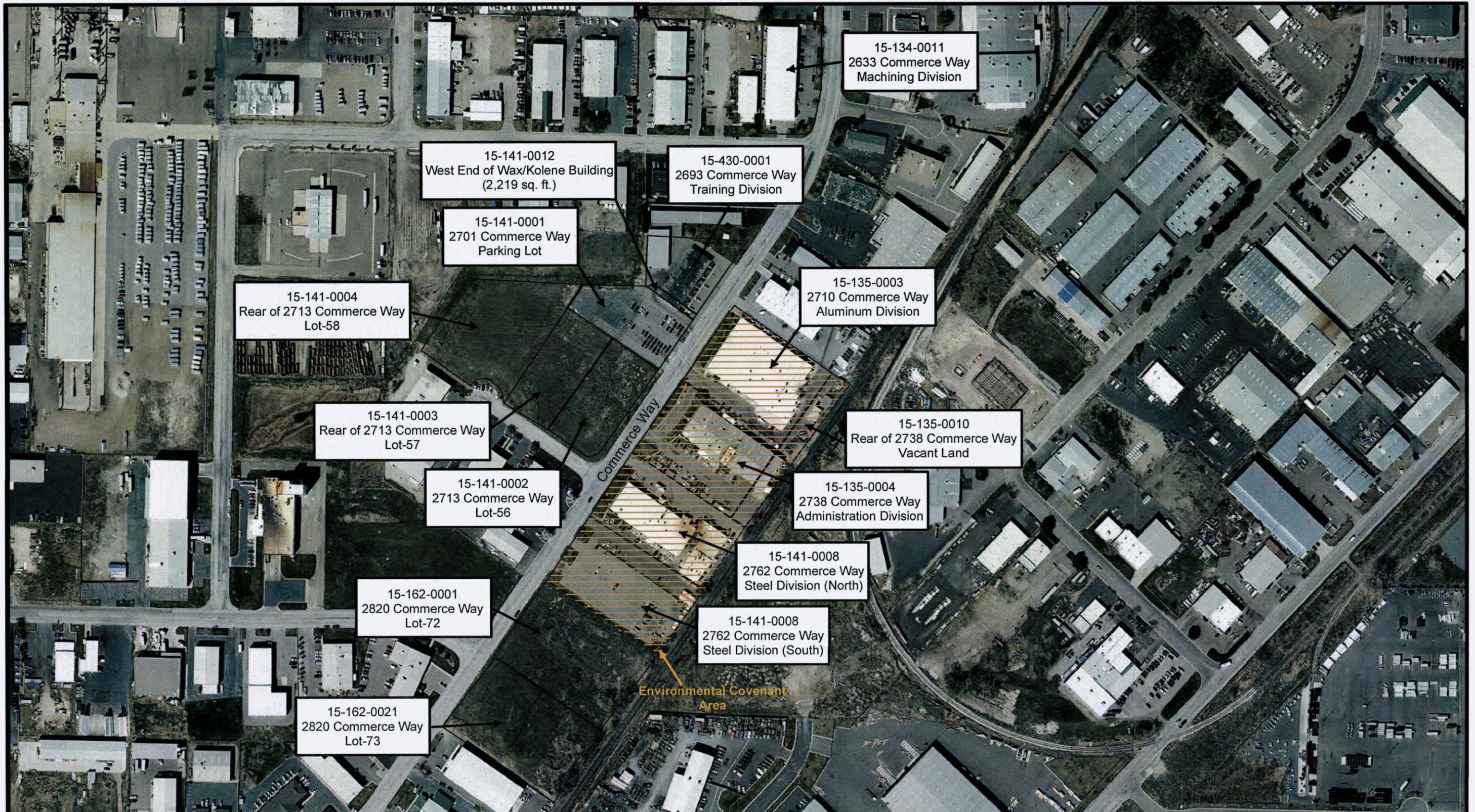


Environmental Science and Engineering

**FACILITY LOCATION MAP**

GSC Foundries  
2738 Commerce Way  
Ogden, Utah

| PROJECT NO. | DRAWING DATE | FIGURE |
|-------------|--------------|--------|
| 1126-001H   | May 1, 2015  | 1      |



1" = 240'

0 120 240 480



Environmental Science and Engineering

FACILITY PARCEL MAP

GSC Foundries  
2738 Commerce Way  
Ogden, Utah

| PROJECT NO. | DRAWING DATE      | FIGURE |
|-------------|-------------------|--------|
| 1126-001H   | September 8, 2015 | 2      |