



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8EPR-ER

ACTION MEMORANDUM

SUBJECT: Approval and Funding for a Removal Action at the Utah Metal Smelter Site in Salt Lake City, Salt Lake County, Utah, pursuant to the On Scene Coordinator's delegated authority under CERCLA Section 104

FROM: Martin McComb
Federal On-Scene Coordinator

THRU: Laura Williams, Unit Leader
Emergency Response

TO: David A. Ostrander, Director
Emergency Response & Preparedness Program

Site ID# A8C8

I. PURPOSE

The purpose of this Action Memorandum is to document the decision to initiate the emergency response action described herein for the Utah Metal Smelter Site in Salt Lake City, Salt Lake County, Utah, pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104. This emergency response action involves the removal and disposal of lead contaminated soil from two residential properties and a portion of open space. Conditions existing at the Site present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the National Contingency Plan (NCP).

This removal action involves no nationally-significant or precedent-setting issues. This removal action will not establish any precedent for how future response actions will be taken, and will not commit the US Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future responses or resources.

II. SITE CONDITIONS AND BACKGROUND

Site Name:	Utah Metal Smelter
Superfund Site ID (SSID):	A8C8
NRC Case Number:	Not Applicable
CERCLIS Number:	UTN000802637
Site Location:	Salt Lake City, Salt Lake County, Utah
Lat/Long:	40.7490010 / -111.9243260
Potentially Responsible Party (PRP):	Unknown
NPL Status:	Non NPL
Removal Start Date:	May 12, 2014

A. Site Description

1. Removal Site Evaluation

The Environmental Protection Agency Region 8's Site Assessment Team requested that the Agency's Response Unit (EPA) perform a removal assessment at the location of a former specialty metal smelter. The smelter operated for thirty years beginning in 1926 and is now a residential neighborhood comprised of single family homes, an elementary school and an open space green way which was developed from a former railroad that ran by the smelter.

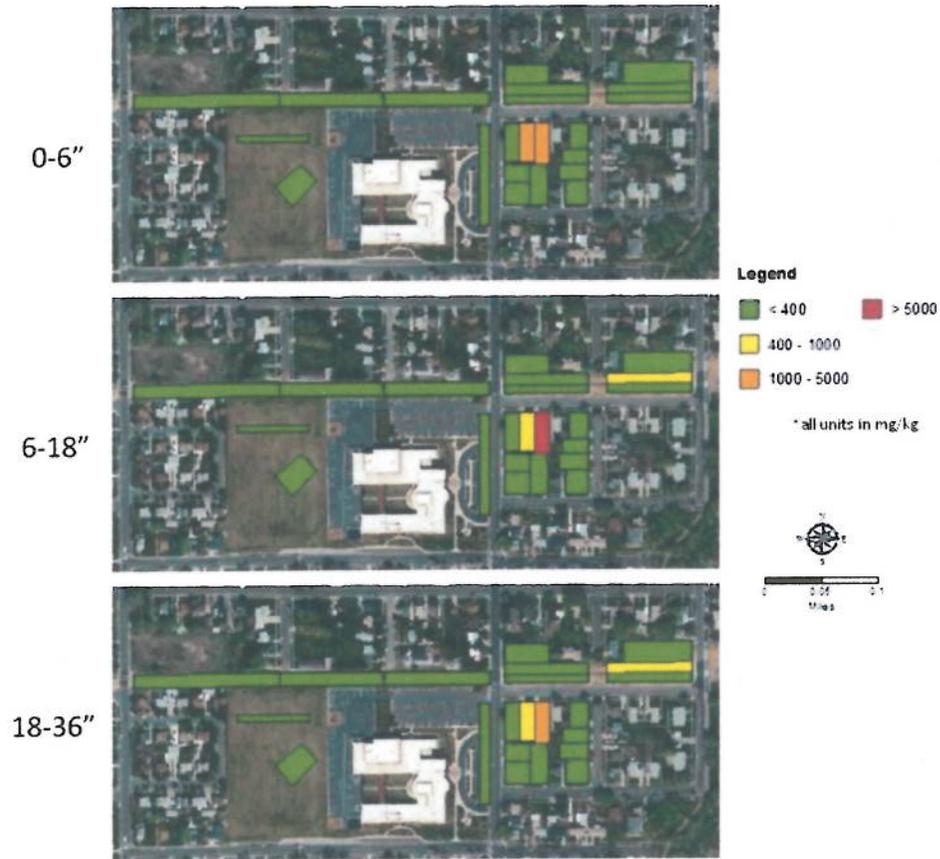
EPA, in coordination with the Utah Department of Environmental Quality (UDEQ), collected soil samples from the open space, the elementary school and nine private properties. Samples were collected at three depths: 0-6", 6-18" and 18-36". Samples were dried, sieved and analyzed on site using X-ray fluorescence (XRF) technology. The XRF results were then confirmed with secondary laboratory analysis.

The samples from one section of the greenway and two private properties near the former railroad were found to contain elevated levels of lead:

Location	Property Type	Depth	Lead (mg/kg)
1153 West Hayes Ave	Single Family Home	0-6"	4140
		6-18"	9220
		18-36"	3440
1155 West Hayes Ave	Single Family Home	0-6"	1650
		6-18"	1260
		18-36"	1030
NW corner of South 1100 West and West Hayes Avenue	Open Space	0-6"	20
		6-18"	1300
		18-36"	1740

All of the other sample results that were collected were found to be below EPA's standard residential action levels of 400 mg/kg lead. See Figure 1.

Figure 1: Sample Results



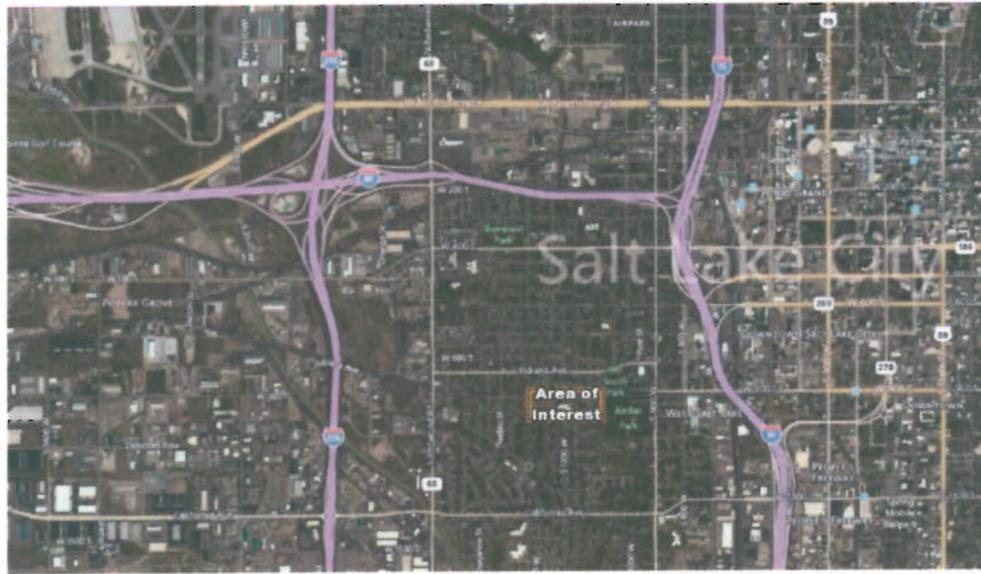
2. Physical Location

The Utah Metal Smelter Site (Site) is located in the Glendale neighborhood of Salt Lake City, Salt Lake County, Utah (40.748541 latitude, -111.925695 longitude). See Figure 2.

The Site is roughly bordered to the east by Glendale Street and South 1100 West, to the south by American Street, to the west by Navajo Street, and to the north by open space.

According to 2010 census data, more than 5000 people live within one mile of the Site. Parkview Elementary School currently has a student enrollment of 429 children and employs roughly 35 teachers and support staff.

Figure 2: Site Location



3. Site Characteristics

The site is an abandoned specialty metal refinery that operated from 1926 to 1956. The facility manufactured electrotype and linotype printing alloys, zinc babbitt metal and other specialty mixtures. The area is now a residential neighborhood that includes single family homes, an elementary school and an open space. The open space includes a path that is popular with cyclists, runners and walkers and is also frequented by homeless individuals.

Figure 3: Utah Metal Smelter (circa 1950)



Source: Utah Department of Environmental Quality

4. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant, or Contaminant

Lead is listed as a hazardous substances in 40 CFR §302.4. Elevated blood lead levels in children can result in behavior and learning problems, lower IQ and hyperactivity, slowed growth, hearing problems and anemia. In rare cases, ingestion of lead can cause seizures, coma and even death. During pregnancy, elevated lead in the blood can result in serious effects to the mother and her developing fetus, including reduced growth of the fetus and premature birth. Lead is also harmful to other adults and can cause cardiovascular effects, increased blood pressure and incidence of hypertension, decreased kidney function and reproductive problems (source: <http://www2.epa.gov/lead/learn-about-lead#effects>).

5. NPL Status

This Site is neither on nor currently being considered for inclusion on the NPL.

B. Other Actions to Date

1. Previous Actions

None.

2. Current Actions

None.

C. State and Local Authorities' Role

1. State and Local Actions to date

State and local authorities assisted EPA in obtaining access consents and collecting samples during the Removal Assessment Phase.

2. Potential for Continued State/Local Response

State and local entities do not have the resources or authority to conduct this removal action, and are involved in a consultation role only.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the Site present a threat to public health and the environment, and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the NCP.

EPA has considered all the factors described in 40 CFR 300.415(b)(2) of the NCP and determined that the following factors apply at the Site.

“(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants or contaminants:”

Levels of lead contamination exceed 9,000 parts per million in the residential soil at the Site. This concentration that is well above the amount considered to be an acceptable level of contamination from either an acute or chronic exposure standpoint.

“(iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate:”

The contaminated soils may migrate due to common gardening and landscaping activities.

“(v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released:”

The contaminated areas are poorly vegetated and contaminated spoil may migrate due to adverse weather conditions such as wind and rain.

“(viii) The availability of other appropriate federal or state mechanisms to respond to the release:”

Local and state governments do not have the capability to conduct the action in a timely manner.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action described in this Action Memorandum, may present a threat to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

Not Applicable.

VI. SELECTED REMOVAL ACTION AND ESTIMATED COSTS

A. Planned Actions

1. Planned Action Description

Soils will be removed at 1153 West Hayes Ave, 1155 West Hayes Ave and the open space between South 1100 West and Emery Street. Contaminated soils will be excavated to a depth of at least 2 feet, treated with an amendment to stabilize the lead and staged pending TCLP analysis. Once the soil is proven to pass TCLP tests for metals, the soil will be transported to a local landfill, where it can be utilized as daily cover material.

Non-contaminated fill and topsoil will be used to replace the excavated material and pre-excavation landscapes shall be restored.

2. Contribution to Remedial Performance

This effort will, to the extent practical, contribute to any future remedial effort at the Site. However, no further federal action is anticipated at this time.

3. Engineering Evaluation/Cost Analysis (EE/CA)

An EE/CA is not required for a time-critical removal action.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

This Action Memorandum addresses the proposed emergency removal action at the Utah Metal Smelter Site. Lead is the principal contaminant of concern. This removal action is required, to the extent practicable considering the exigencies of the situation, to attain Applicable or Relevant and Appropriate Requirements (ARARs). In determining whether compliance with an ARAR is practicable, the EPA may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted. A table containing potential Site-specific ARARs is provided as Attachment 1.

5. Project Schedule

This removal action is proposed to start on May 12, 2014 and end by June 15, 2014.

B. Estimated Costs*

Contractor Costs:	
ERRS (construction support)	\$ 125,000
START (technical support)	\$ 25,000
ESAT (analytical support)	\$ 5,000
SUBTOTAL	\$ 155,000
Contingency costs (20% of subtotal)	\$ 31,000
Total Removal Project Ceiling	\$ 186,000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would increase the threat to the public health and/or the environment.

VIII. OUTSTANDING POLICY ISSUES

None

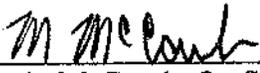
IX. ENFORCEMENT

A separate Enforcement Addendum has been prepared providing a confidential summary of current and potential future enforcement activities.

X. RECOMMENDATIONS

This decision document represents the selected removal action for the Utah Metal Smelter in Salt Lake City, Salt Lake County, Utah developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$186,000; this amount will be funded from the Regional removal allowance.



Martin McComb, On Scene Coordinator
Emergency Response Unit

May 11, 2014
Date

Attachments:

Attachment 1: Applicable or Relevant and Appropriate Requirements (ARARs)

Attachment 1 – Applicable or Relevant and Appropriate Requirements (ARARs)

Statute	Citation	Description	Comments	ARAR Determination
FEDERAL				
Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976 (RCRA Subtitle D)	40 CFR Part 257, Subpart A: § 257.3-1 Floodplains, paragraph (a); § 257.3-7 Air, paragraph (b)	Regulates the generation, storage, handling and disposal of solid waste.	Generator standards apply, as well as those for staging piles	Applicable
STATE				
Utah Air Quality Rules	UAC R307-205-5	Addresses fugitive dusts from construction activities greater than a quarter-acre in size.	Proper site controls will be employed to minimize fugitive dusts released from the site.	Relevant and Appropriate. Will be complied with to the extent practical.
Utah Air Quality Rules	UAC R307-205-8	Specifically describes the proper management of fugitive dusts, construction activities, and roadways associated with tailings piles and ponds.	Proper site controls will be employed to minimize fugitive dusts released from the site.	Relevant and Appropriate. Will be complied with to the extent practical.
Utah Solid and Hazardous Waste Rules	UAC R315-301-6	Insures that the management of solid wastes will not adversely impact human health and the environment.	Proper waste management practices will be used to insure tailings do not impact the groundwater, surface water, air, soil.	Relevant and Appropriate. Will be complied with to the extent practical.

UAC - Utah Administrative Code