



1. Applicant Identification
University of Utah
201 Presidents Circle
Salt Lake City, UT 84112
2. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$2,000,000
3. Location
a) Salt Lake City b) Salt Lake County c) Utah
4. Property Information
SLC Station Center: 550 and 570 West 400 South, Salt Lake City, UT 84101
5. Contacts
 - a. Project Director
Michael Brehm, Associate Director Environmental Management & Code Compliance
125 South Fort Douglas Blvd
Salt Lake City, UT 84113
801-585-1617
michael.brehm@ehs.utah.edu
 - b. Chief Executive/Highest Ranking Elected Official
Cathy Anderson, Chief Financial Officer
University of Utah, Office of the President
John R. Park Building
201 Presidents Circle – Room 201
Salt Lake City, Utah 84112
801-581-6940
cathy.anderson@utah.edu
6. Population
Salt Lake City, UT: 199,153 (US Census: 2017–2021 American Community Survey)



7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

8. Releasing Copies of Applications

Not Applicable.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area: Founded in 1850, Salt Lake City's University of Utah (University) is almost as old as Salt Lake City itself. The University is the flagship institution of higher learning in Utah, and is a nationally-recognized top-tier research university that the Wall Street Journal rated as the No. 8 public university in the nation in 2023. As the University seeks to expand its presence beyond its established campus, Salt Lake City's legacy of decades of smelting, mining, and other heavy industry, subsequent economic instability and widescale disinvestment, and the resulting surplus of aging, vacant commercial and industrial properties presents both rich opportunities and enormous brownfield challenges.

The target area has been blighted for decades due to its industrial nature and many derelict sites, with numerous properties affected by contaminants associated with hazardous substances, particulate matter, and petroleum. The Salt Lake City (SLC) Station Center Site (SLC Station Center) is located entirely within Census Tract 43035102502. The target area directly borders Climate and Economic Justice Screening Tool (CEJST) Justice40 Initiative Disadvantaged census tract 49035102600.

The target area is part of a larger area of Salt Lake City identified by the Salt Lake City Redevelopment Agency (SLCRDA) as the "Depot District Redevelopment Project Area" (Depot District). The 240-acre Depot District covers the area from North Temple to 400 South Street and 400 West Street to Interstate 15, which includes the entire target area. Historically, the area has been part of Salt Lake City's industrial and railroad corridor. With the reconstruction of I-15 off-ramps and the consolidation of rail lines along 700 West Street, the improved accessibility of the area has made investment more desirable. The Depot District is one of the most rapidly developing areas of downtown Salt Lake City, hosting an impressive set of urban amenities, including the nexus of the city's transportation network. Salt Lake City is working to transform this area into a vibrant, walkable, bikeable, transit-oriented community by promoting public and private investments in the target area. The SLC Station Center Site is located adjacent to the Salt Lake City Intermodal Hub, which offers connections to local bus service, TRAX light rail, FrontRunner commuter rail, and Amtrak intercity passenger rail services, making the SLC Station Center site ideal for transit-oriented development (TOD). This Cleanup Grant will allow the SLC Station Center Site to be a cornerstone of a clean and revitalized Depot District that will give the University a broader, more inclusive presence in Salt Lake City.

ii. Description of the Proposed Brownfield Site(s): The specific cleanup site for this application is the SLC Station Center Site, a 1.89-acre property located at 550 and 570 West 400 South Street in Salt Lake City. This site is directly adjacent to the Salt Lake City Intermodal Hub, which offers connections to local bus service, TRAX light rail, FrontRunner commuter rail, and Amtrak intercity passenger rail services. This site sits within a half-mile of the newly constructed Folsom Trail that offers a walk-friendly/bike-friendly connection to neighborhoods on the west side of I-15 with their historic single-family homes, several churches, elementary schools, and the Jordan River Parkway trail. The SLC Station Center site also offers walkable, bikeable, and transit-accessible connections to several of Utah's major gathering places to the north and east, including the Delta Center, the Gallivan Center, the Rose Wagner Performing Arts Center, premier restaurants, shopping centers such as the Gateway and City Creek, and the main University campus.

Since 1911 the site has had numerous industrial uses including a cleanser (soap) company, poultry processing, automobile and heavy equipment repair, a heating plant, and a paint shop. The

site was most recently occupied by WRR Industries, Inc., a landscaping and erosion control contractor, who used the buildings on the property for office space; dry storage of miscellaneous new and old stock materials, such as auto parts and landscaping equipment; vehicle storage; and diesel truck repair. **The property's dilapidated, 80-year-old, 38,000-square-foot industrial building now sits vacant** as the University looks to carry out its reuse plans. A Phase I Environmental Site Assessment (ESA) was conducted on the site as part of the University's pre-purchase due diligence, and multiple privately funded subsurface soil and groundwater investigations have been conducted. Near-surface soils throughout the site are comprised of non-native fill materials that are geotechnically unsuitable and have been reported to contain low concentrations of volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs). Chlorinated solvents including tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (DCE), and vinyl chloride (VC) have been reported in groundwater at concentrations up to three orders of magnitude above EPA Maximum Contaminant Levels (MCLs) and Vapor Intrusion Screening Levels (VISLs). PCE and TCE have been reported in soil gas at concentrations up to two orders of magnitude above VISLs. These contaminants are believed to be due to releases from former industrial users of the SLC Station Center Site, as the site shows evidence of historical releases from industrial operations that include leaking, spilling, solvent use, waste storage and disposal, wastewater discharge, and staining. The prior property owner, who is not suspected to have caused the chlorinated solvent release, attempted to remediate the groundwater contamination over a three-year period from 2019 to 2021 at an assumed cost of more than \$100,000. These attempts were unsuccessful, and groundwater and soil gas at the SLC Station Center Site remains highly contaminated with chlorinated solvents.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans:

The University has sought to establish a presence in downtown Salt Lake City since early 2020. The University is well-versed in Salt Lake City's development plans in the SLC Station Center area and has been working and partnering with the SLCRDA for several years. These partnering efforts include a feasibility study completed by HR&A Advisors in 2021 that included extensive community outreach and input to explore the establishment of an innovation district for Life Sciences and Community Health. This joint effort between the University of Utah, the SLCRDA, and various community partners including the Utah Transit Authority aims to transform the heart of the Depot District into a **hub of innovation, allowing a wide range of residents and businesses to live, work, and contribute the ideas necessary for an "innovation district" to thrive**. The University will be the long-term owner and operator of the SLC Station Center Site, and the SLCRDA will be a close collaborator in design and management decisions. The innovation district will build on Salt Lake City Mayor Erin Mendenhall's "Tech Lake City" initiative, which **focuses on bringing more businesses from the life sciences and medical tech fields, including pharmaceutical and medical device companies and research, testing, and medical laboratories to Salt Lake City**. The **SLC Station Center site will serve as an off-site extension of the University's Research Park** (a 320-acre site adjacent to the University's main academic campus which houses more than forty companies and has an annual in-state productivity exceeding \$550 million). The site will be developed with a multipurpose commercial building that will house offices and research space occupied by University students and faculty as well as private companies pioneering cutting-edge technologies. The building will occupy nearly all of the 1.89-acre site and be up to 150 feet tall. Bringing the University's research and commercialization work to Salt Lake City's west side will immediately elevate these communities', which have been historically marginalized and isolated. The Depot District is Salt Lake City's most transit-rich

neighborhood, and the SLC Station Center is an opportunity to create a model of transit, bike, and pedestrian-focused development in the state of Utah. This use will bring jobs and economic activity to an area with inhibited employment growth and land values.

ii. Outcomes and Benefits of Reuse Strategy: Cleanup and reuse of this site will create a unique environment for entrepreneurial growth, job creation, and in-state productivity, providing convenient access to research jobs and incubating innovative businesses derived directly from research conducted at the University. **Studies have shown that up to 50% of current life science jobs in Utah can trace their beginnings to similar facilities at the University’s Research Park,**¹ which today houses 48 companies. This will lead to increased employment opportunities open to community members with a range of educational and work experience, from temporary construction jobs, to entry-level custodial or groundskeeping staff, to research associates with advanced degrees. Property values in the area will increase (economic benefit) with improved walkability/bikeability, access to existing TRAX light rail and Frontrunner commuter rail at the Salt Lake City Intermodal Hub, and connectivity to both the west and east sides of Salt Lake City (noneconomic benefits). Development of University facilities is expected to draw other new and thriving businesses to the area, reduce crime rates (see below), and draw new people to this vibrant “Tech Lake City” community. The SLC Station Center Site’s emphasis on healthcare innovation and life sciences will also serve the public good, helping Salt Lake City residents have access to world-class innovations and jobs that will also benefit public health globally.

The University’s Energy Office designs, manages, and implements increased efficiency measures across University facilities. The Energy Office will be involved in design and review of future building plans at the SLC Station Center Site to ensure that site redevelopment incorporates High-Performance Building standards and LEED building standards into building designs to maximize resource efficiencies, incorporate use of renewable energy sources, and reduce waste, pollution, or other environmental impacts. With improved walkability/bikeability and **access to mass transit**, there is an anticipated outcome of reducing greenhouse gas emissions, improving air quality, and improving local climate adaptation/mitigation capacity, including preservation of the Great Salt Lake. Redevelopment, coupled with access to mass transit, will spur growth and revenue that will make a more economically and climatically resilient community.

c. **Strategy for Leveraging Resources** i. Resources Needed for Site Characterization: The previous subsurface investigations conducted at the site sufficiently characterized the overall extent and degree of contamination to develop a draft Analysis of Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach. A nominal amount of additional site characterization is required to fully delineate the off-site extents of VOC-impacted soil gas (4–6 soil gas samples), which the University has already allocated funding to complete by June 15, 2024. Groundwater impacts at the SLC Station Center Site have been fully characterized and the site is ready to proceed directly into the cleanup phase.

ii. Resources Needed for Site Remediation: EPA grant funding requested in this application will be sufficient to allow the University to complete the remediation of the SLC Station Center Site. The University will spearhead the cleanup process and hire a qualified environmental contractor to manage remediation efforts. The cost of the cleanup required does not fit into the University’s available funding for site redevelopment. The partnership with the EPA will fulfill the University’s goal of remediation and allow it to move on to the reuse phase of development.

iii. Resources Needed for Site Reuse: Following the cleanup of the site, funds will be required to redevelop the site for reuse. Redevelopment of the site will be a public-private partnership (P3)

¹ <https://attheu.utah.edu/facultystaff/research-park-work-play-learn-and-live/>

that will appropriately leverage strengths from each partner (University/University of Utah Research Foundation (UURF), SLCRDA, private sector, private donors) by providing an environment conducive to the interaction of the University and industrial communities, and encouraging the transfer of University research and technology to the private sector for the creation of jobs and state revenues. To expedite remediation of the site and maximize the use of potential Cleanup Grant funds, the University is self-funding abatement of asbestos-containing materials (ACMs) present in the existing buildings, as well as demolition of the existing buildings following completion of ACM abatement, at a cost of approximately \$450,000. ACM abatement and building demolition is expected to be complete by spring 2024.

iv. Use of Existing Infrastructure: The target area including the SLC Station Center Site has existing infrastructure in place such as water, sewer, power, telecom, and internet. The University believes that the existing infrastructure will meet the demands for the planned redevelopment, but in the event infrastructure improvements are needed, the cost of these improvements is expected to be nominal relative to the overall construction cost and will not create a significant impediment to redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. **Community Need** i. The Community's Need for Funding: The **SLC Station Center Site** is located in a low-income community within census tract 43035102502, which directly borders CEJST Justice40 Initiative Disadvantaged Census Tract 49035102600. The overall characteristics of Census tract 43035102502 are similar to the bordering disadvantaged census tract, and for practical purposes are just as disadvantaged as the adjacent tract. Census tract 43035102502 is also located within one of six designated Opportunity Zones in Salt Lake City based on distressed economic conditions.² Within this small community of approximately 1,300 people, **31% are people of color**, compared to a state average of 22%.³ The **median household income within this community (\$54,634) is low** compared to the median household income for the United States (\$69,021), Utah (\$79,133), and Salt Lake County (\$82,206).⁴ Within this community, the percentage of **families below the poverty level is 12.5%**, which is more than double the percentages for the county (5.7%) and state (5.9%).^{Error! Bookmark not defined.} Under these conditions, imposing additional taxes or fees on residents to fund revitalization projects would burden a community already disproportionately impacted by blight, lack of meaningful investment, COVID-19, and recent inflation. The contamination present at the **SLC Station Center Site** presents a significant impediment to privately or publicly funded redevelopment, as evidenced by the prior property owner's unsuccessful multiyear attempt to remediate the site. The University is in need of brownfields funding assistance because the P3s and private donors that will fund new construction at the site cannot be leveraged to fund remediation, and their cleanup funding is not available through the State of Utah or other University coffers.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: The target area's sensitive populations include **people of color (31%**, significantly higher than the state average at 22%),³ and **impoverished families (12.5%**, significantly higher than the national average of 8.9% and the state average of 5.9%).^{Error! Bookmark not defined.} The **poverty rate among female householder families with children under age 18 is 100%**, as compared to 24% in the US.^{Error! Bookmark not defined.} In addition to socioeconomic stressors, the area directly borders areas identified by the CEJST as disadvantaged in seven categories including Climate Change (expected population loss rate and low income), Clean Transit (traffic proximity and volume), Housing

² <https://opportunitydb.com/zones/49035102500/>

³ EPA EJ Screen Report (Version 2.0)

⁴ US Census: 2017–2021 American Community Survey

(historic underinvestment), Legacy Pollution (proximity to NPL/Superfund sites), Clean Water and Wastewater Infrastructure (wastewater discharge), Health Burdens (asthma and low life expectancy), and Workforce Development (unemployment and high school degree non-attainment). A welfare issue that affects the **SLC Station Center Site** area is a **high crime rate**. The total crime rate in Salt Lake City is **233% higher than the national average, the violent crime rate is 150% higher than the national average, and the property crime rate is 249% higher than the national average.**⁵ The high Salt Lake City crime rate relative to the national average is a significant issue deterring redevelopment in the area. The cleanup and repurposing of vacant sites in the Depot District will eliminate dark, underused areas currently being used for criminal activity. Instead, new development will make the Depot District clean and attractive. The remediation and redevelopment of the **SLC Station Center Site** will produce viable job opportunities and create an environment that will lessen criminal activity and support an active, healthy lifestyle for generations to come.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Populations in the target area are subject to the significant air pollution that occurs within the Salt Lake Valley, with impacts primarily from particulates, ozone, and air toxins. The CEJST ranks the target area in **the 75th percentile for persons with asthma (9.5% of adults aged 18 years or older,⁶ compared to 8% nationally),⁷ the 99th percentile for low life expectancy, and the 97th percentile for lack of green space**. The chlorinated VOCs found in the assessment testing of the **SLC Station Center Site** are known carcinogens. **For air toxics cancer risk and respiratory hazard index, the area ranks high (99th percentile) compared to Utah (95th percentile) and the nation (85th percentile).**³ Indices for Environmental Justice (EJ) Indicators for other variables in the target area are also well above normal as compared to statewide and nationwide benchmarks. These variables include proximity to traffic volume, lead paint, Superfund sites, Risk Management Plan (RMP) facilities, hazardous waste management facilities, and underground storage tanks. **Rankings from these indicators in the target area range from the 78th to 99th percentiles statewide, and from the 74th to 99th percentiles nationwide.**³ Using a Cleanup Grant to remediate the VOCs at the site will remove the threat of adverse conditions that contribute to **cancer** and **asthma** and eliminate the migration of VOCs to the community as they use the site and adjoining public spaces.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: Residents in the SLC Station Center Site target area endure a disproportionate share of socioeconomic marginalization related to environmental stressor burdens from the legacy of pollution and proximity to Superfund sites (**1.7 sites/km, compared to 0.13 nationally**), leaking underground storage tank (LUST) sites (**13 sites/km², compared to 3.9 sites/km² nationally**), ozone pollution (**58.3 parts per billion [ppb], compared to 42.5 ppb nationally**), and diesel particulate pollution (**0.551 µg/m³, compared to 0.294 µg/m³ nationally**).³ This neighborhood is impacted by the historical toxicity from not only the site and other nearby properties with long histories of heavy industrial activities, but also proximity to major transportation corridors such as I-15 and I-80 (both within approximately one-quarter mile) and at least three rail lines within 100 yards. This pollution exposure and geographic isolation from the nearby downtown area has decreased property values, limited employment, increased the incidence of crime, and contributed to declining physical and mental health for area residents. Focusing on the Justice40 Initiatives, the Brownfield Cleanup Grant will address several EJ issues plaguing this community by reducing the **EJ burden, decreasing the number of blighted properties, creating new housing, and creating new jobs.**

⁵ Salt Lake City Crime Rates: <https://www.areavibes.com/salt+lake+city-ut/crime/>

⁶ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6549430/>

⁷ https://www.cdc.gov/asthma/most_recent_national_asthma_data.htm

(b) Advancing Environmental Justice: Cleanup and redevelopment of the site will directly achieve Justice40 Initiative goals of remediation and reduction of legacy pollution, energy efficiency, and workforce development, and indirectly spur investment in affordable and sustainable housing. Greater access to jobs that provide health-promoting benefits such as health insurance, medical leave, long-term retirement, greater access to health care, and preventative screenings will promote community health and welfare. Due to the historically industrial nature of the SLC Station Center Site and the recent closing of its former business tenant, there is no displacement of residents/businesses.

Community Engagement i. Project Involvement & ii. Project Roles:

Name of Org.	Point of Contact	Specific involvement in the project or assistance provided
Salt Lake City Redevelopment Agency (SLC RDA)	Cara Lindsley, Dep. Dir. Cara.Lindsley@SLCGov.com	The University has been working and partnering with the SLC RDA for several years. This coordination included feasibility studies for an innovation district and partnering on the Station Center Vision Plan. SLC RDA will help with asset assessment to understand programming complimentary to existing and projected uses near the SLC Station Center Site.
Utah Transit Authority (UTA)	Sean Murphy, Mgr. Real Estate Group SMurphy@RideUTA.com	UTA works with local communities to ensure the current and future UTA systems meet transportation needs. UTA will help with identifying direct and indirect impacts and opportunities for future users of the SLC Station Center site to be better served by UTA transit systems.
Salt Lake City Council District 2	Alejandro Puy, Rep. Alejandro.Puy@SLCGov.com	Salt Lake City Council District 2 will help support the University's efforts to disseminate information to the community by informing the community about the University's plans for the SLC Station Center site and providing a forum for the University to address the community directly.
Granary District Alliance (GDA)	Britney Helmers, Chair [REDACTED]	The mission of the GDA is to connect GDA businesses, residents and visitors, promote and support the creation of a vibrant and diverse neighborhood culture, and encourage thoughtful development in the Granary District, while preserving the unique character of the neighborhood. The Granary District borders the Depot District where the SLC Station Center site is located and has significant shared interests with the Depot District community. They will assist with providing community meeting forums and email and social media contacts.
Salt Lake Chamber	Heidi Walker, Chief Operating Officer HWalker@SLChamber.com	The Chamber is the host of the "Utah Compact on Racial Equity, Diversity, and Inclusion," an initiative that has been joined by a wide range of Salt Lake City community leaders and numerous staff and faculty of the University of Utah over the years. The declaration represents a living list of individuals who can be approached for guidance and support on Environmental Justice-related aspects of this project.

iii. Incorporating Community Input: The University informed the public of their intent to pursue an EPA Brownfield Cleanup Grant in the University's widely-read webmail publication "@TheU" on October 23, 2023. A Community Involvement Plan (CIP) will be created to describe the project's planned community engagement activities, schedule, background, and key players. The CIP will be available for resident review online on the University's website and social media page(s) or in hard copy at the University's Public Affairs office. University staff will conduct several community meetings during the duration of this grant within the target area. These meetings will explain the cleanup project and give project updates throughout the entire process to inform and engage members of the public. Input from the target-area residents will be recorded in meeting minutes and will be responded to within two weeks of receipt.

Public meetings will be held at least once a year throughout the grant period, and periodic updates will be made during regularly scheduled SLCRDA and Salt Lake City Council meetings. The University will use multiple forms of media to provide alternatives to in-person community engagement and ensure that the underserved community and project partners are included in

outreach efforts. Additionally, project updates and other grant-project-related documents will be provided on social media pages and email distribution lists. The target-area residents and property owners will be encouraged to join an email distribution list and follow the project on social media to remain informed of the latest news of the project’s progress and upcoming events. Partners will be encouraged to disseminate information to those without internet access. Project partners committed to outreach assistance will be asked to help to publicize project progress, events, and accomplishments. When non-English-speaking members of the community are present, the University will provide verbal translation at meetings and written translations in meeting notes, fliers, and outreach.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. **Proposed Cleanup Plan:** The site contains shallow fill soils (upper 24 inches) that are geotechnically unsuitable and contain low concentrations of VOCs and PAHs. Groundwater and subsurface soil gas is contaminated with VOCs above EPA screening levels. A draft ABCA was developed for the site that evaluated four alternatives including a no-action alternative. With consideration of effectiveness, implementation feasibility, and relative costs, the recommended cleanup alternative consists of fill-soil removal, treatment of VOCs in groundwater by in-situ biological enhanced reductive dechlorination (ERD) and abiotic in-situ chemical reduction (ISCR), and design of a vapor mitigation system (VMS) to mitigate the potential for exposure to VOCs in the building by sub-slab vapor intrusion. The site will remain enrolled in the Utah Department of Environmental Quality (UDEQ), Division of Waste Management and Radiation Control (DWMRC) Environmental Cleanup Program for regulatory oversight purposes, with oversight costs paid from grant funds. Impacted shallow fill soils will be removed for off-site disposal at a Resource Conservation and Recovery Act (RCRA) Subtitle D facility; this will occur throughout most of the site. Dissolved VOCs in groundwater will be treated by in-situ biological ERD and abiotic ISCR. Treatment solutions will be injected in a grid pattern throughout the groundwater VOC plume via direct-push methods by a specialized remediation contractor. These actions will effectively eliminate the potential for exposure to impacted soils and treat VOC-impacted groundwater that is the source of impacts to soil gas.

b. Description of Tasks/Activities and Outputs

Task 1: Outreach	
i.	<i>Project Implementation:</i> The University Brownfield Project Director will develop a Community Involvement Plan (CIP), outreach materials, brownfield project website, and social media posts with the assistance of the environmental contractor (EC). University staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created within three months of award. Community Meetings held 1 st and 3 rd quarter (Years 1–3) and 1 st quarter of Year 4. Website and Outreach Materials will be created in the 1 st quarter and posted monthly throughout the grant project.
iii.	<i>Task/Activity Lead:</i> University of Utah: Michael Brehm, Brownfield Project Director
iv.	<i>Outputs:</i> CIP, Brownfield Website, 4 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA required Quarterly Reports.
Task 2: Programmatic Support	
i.	<i>Project Implementation:</i> The University will procure an EC to assist with project oversight and oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The EC will assist the University in completing ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional Programmatic Support for the four-year term of the grant. The University staff travel budget allows for two staff to attend two national/regional/grantee brownfield training conferences/workshops.

ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 st quarter, and Quarterly Reporting begins in the 2 nd quarter and continues throughout the grant project. Yearly Reporting and Forms created in 5 th , 9 th , 13 th quarters, and during final closeout.
iii.	<i>Task/Activity Lead:</i> University of Utah: Danny Wall, Brownfield Project Manager
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend two conferences.
Task 3: Cleanup/Reuse Planning	
i.	<i>Project Implementation:</i> The University Brownfields Project Director will oversee the EC as they finalize the ABCA, prepare a Remedial Action Plan, prepare QAPPs and Health and Safety Plans (HASPs).
ii.	<i>Anticipated Project Schedule:</i> Initiated on award and funding of the grant 10/2024; QAPP and final ABCA preparation 03/2025; QAPP approval 06/2025.
iii.	<i>Task/Activity Lead:</i> The EC will handle the technical aspects of the project with oversight from the University of Utah: Michael Brehm, Brownfield Project Director
iv.	<i>Outputs:</i> 1 ABCA, 1 Remedial Action Plan, 1 Site Specific-QAPP & HASP
Task 4: Cleanup Oversight	
i.	<i>Project Implementation:</i> The University Brownfields Project Director will oversee the EC as they manage site cleanup activities including contractor mobilization, soil removal, and/or groundwater treatment, and cleanup reporting.
ii.	<i>Anticipated Project Schedule:</i> Begin in the 8 th quarter and continue throughout the grant project.
iii.	<i>Task/Activity Lead:</i> The EC will handle the technical aspects of the project with oversight from the University: Michael Brehm, Brownfield Project Director
iv.	<i>Outputs:</i> Weekly status reports during cleanup, 1 cleanup report.
Task 5: Cleanup	
i.	<i>Project Implementation:</i> The University Brownfields Project Director will oversee the EC as they manage the proposed site cleanup activities including removal of fill soils, confirmation soil sampling, groundwater treatment by biological ERD and abiotic ISCR, groundwater and soil gas monitoring and reporting, vapor mitigation system (VMS) design, contractor oversight, and cleanup oversight and reporting.
ii.	<i>Anticipated Project Schedule:</i> Field mobilization by 07/2025; groundwater treatment and soil removal complete by 12/2025; final remedial action report by 6/2028; EPA closeout report by 12/2028
iii.	<i>Task/Activity Lead:</i> The consultant will handle the technical aspects of the project with oversight from the University: Michael Brehm, Brownfield Project Director
iv.	<i>Outputs:</i> 1 site ready for reuse, 4 remediation jobs created (annualized), 1 cleanup report, 1 site management plan, 1 environmental covenant

Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.* The budget for this project includes travel, supplies, construction, and contractual costs only. Personnel and fringe costs will be paid as in-kind services by the University. All work will be conducted in adherence to Davis Bacon guidelines. **Task 1 Outreach:** Contractual: Community Involvement Plan \$3,500 (28 hrs x \$125); Brownfield Website, Outreach Brochure/Cleanup Site Signage, Social Media Posts \$3,000 (24 hrs x \$125); 4 Community Meetings \$5,000 (40 hrs x \$125; \$1,250/meeting). Supplies: Outreach Supplies (printed brochures) \$1,000 (1,000 x \$1.00). **Task 2 Programmatic Support:** Travel: Two staff to attend two conferences \$9,000 (flights at \$750, 3 nights in hotel at \$350 each, 3 days' incidentals and per diem at \$150/day for 2 attendees x 2 conferences). Contractual: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$24,000 (192 hrs x \$125). **Task 3 Planning:** Contractual: Finalize Draft ABCA, Prepare Site Specific QAPP, HASP and permitting for \$8,000 (64 hrs x \$125). **Task 4**

Cleanup Oversight: Contractual: Surficial Soil Removal \$20,000: consultant oversight \$12,000 (96 hrs x \$125), soil confirmation sampling and landfill laboratory analysis \$8,000 (20 at \$400/sample); groundwater treatment by in-situ reductive dechlorination \$53,500 (428 hrs x \$125); post-remediation groundwater and soil gas monitoring and reporting—8 quarterly monitoring & reporting events at \$15,000 per monitoring event for a total of \$120,050 (64 groundwater samples at \$100/sample; 64 soil gas samples at \$350/sample; 730 hrs x 125); cleanup oversight and reporting \$79,950 (533 hrs x \$150). **Task 5 Cleanup:** Contractual: VCP Regulatory Oversight \$23,000 (00 hrs x \$115); Vapor Mitigation System Design \$30,000 (200 hrs x \$150); Groundwater treatment by in-situ reductive dechlorination (combined biological ERD and abiotic ISCR) \$283,500: In-situ remediation design validation study \$30,000 (4 passive flux meters at \$3,000/each, 120 hrs x \$150);. Construction: Surficial Soil Removal \$620,000: Contractor mobilization, soil excavation, transport, and disposal of fill soil \$620,000 (10,000 tons at \$62/ton); Groundwater treatment by in-situ reductive dechlorination (combined biological ERD and abiotic ISCR) \$970,000: Groundwater treatment by reductive dechlorination = remediation contractor (design and injection field implementation) \$270,000; Chemicals (including delivery and sales tax) \$700,000.

Category	Tasks					Totals
	<i>Outreach</i>	<i>Programmatic Support</i>	<i>Planning</i>	<i>Cleanup Oversight</i>	<i>Cleanup</i>	
Travel		\$9,000				\$9,000
Supplies	\$1,000					\$1,000
Contractual	\$11,500	\$24,000	\$8,000	\$273,500	\$83,000	\$400,000
Construction					\$1,590,000	\$1,590,000
Total Budget	\$12,500	\$33,000	\$8,000	\$273,500	\$1,673,000	\$2,000,000

c. **Plan to Measure and Evaluate Environmental Progress and Results:** To ensure this EPA Brownfield Grant is implemented on schedule, the University’s Internal Brownfields Team, which will include the EC, will meet quarterly to track all **outputs identified in 3.b.** using an Excel spreadsheet. The University of Utah will report progress to the EPA via quarterly reports, and project expenditures and activities will be compared to the project schedule to ensure the project will be completed within the four-year time frame. Site information will be entered and tracked in the ACRES database. Outputs to be tracked include QAPP, ABCA, and cleanup plan development, contractor procurement, quarterly, annual, and closeout reports, and the number of community meetings. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently, countermeasures are in place to address the problem, which include making monthly calls to the EPA Project Officer and, if needed, creating a Corrective Action Plan to get back on schedule. Outputs and outcomes will be aligned with EPA's 2022-2026 Strategic Plan.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Structure & ii. Description of Key Staff:

The University has a large, qualified workforce of more than 22,000 individuals, including dedicated Environmental Health and Safety, Real Estate Administration, and Office of Sponsored Projects departments. The University can successfully manage and implement all phases of the work required to remediate and revitalize the property at the SLC Station Center Site. The **Brownfield Project Director** for this grant will be Michael Brehm, who will be responsible for timely expenditure of funds. Mr. Brehm is the University’s Associate Director of Environmental

Management and has led all environmental compliance for the University of Utah since 2013, is a licensed Professional Engineer, and has a 40-year background in environmental engineering and environmental consulting. Danny Wall will serve as the **Brownfield Project Manager** and will be responsible for management of day-to-day activities including coordination of grant cleanup activities with all involved University departments, project partners, subconsultants, and the community. Mr. Wall is the Executive Director of the University's Real Estate Administration Department. Adam Wyatt from the University's Department of Planning, Design & Construction will act as the **Brownfield Financial Manager** and will be responsible for financial aspects of the grant including drawing down funds through the ASAP system, assistance with budget tracking, invoicing, and arranging payments to the proper entities. Mr. Brent Brown, the University of Utah's Director of the Office of Sponsored Projects (OSP), will assist with grant administrative duties as a **Grant Administrator**. The OSP is staffed by over 40 dedicated professionals whose mission is the high-quality delivery, oversight, and process documentation of all grant monies spent by the University.

iii. Acquiring Additional Resources: The University will procure a qualified environmental contractor and subcontractor to assist with technical and reporting aspects of the Brownfield Cleanup. Job opportunities to provide remediation and redevelopment services will be posted in the community, and preference will be granted to local contractors providing services in the community and employment of residents for remediation and redevelopment of the site. Procurement procedures will comply with both the University of Utah's competitive contracting and procurement process, and also with EPA requirements for "Professional Service" including 2 CFR §§ 200 and 1500.

b. Past Performance and Accomplishments ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose and Accomplishments: The University of Utah's grant funding totaled \$489 million in fiscal year 2023 and \$686 million in fiscal year 2022. The University achieved milestones of \$600 million in grant funding the previous two fiscal years and \$500 million the previous four fiscal years. Of these grant funds, almost 70% were from federal agencies, including the Department of Defense, the Department of Energy, the National Institutes of Health, the National Science Foundation, the Department of Health and Human Services, the Department of Veterans Affairs, and the EPA. The University's EPA grants awarded in the previous five fiscal years totaled approximately \$1.084 million. Recent EPA grants awarded include a \$1 million grant to the University's College of Engineering to study prediction of nonlinear climate variation impacts in urban and urbanizing watersheds (completed August 31, 2021), and a \$51,000 grant to the University's College of Mines and Earth Sciences to create a predictive transport model for natural colloids and engineered nanomaterials in porous media (completed August 31, 2019).

(2) Compliance with Grant Requirements: For the above listed grants, the grant schedules, terms, and conditions were followed to ensure timely completion of projects. During the project periods, no corrective actions were required, University staff maintained compliance with expenditure stipulations, and required reporting was submitted/completed in a timely manner. The University manages numerous multimillion-dollar federal grants and has the capability to effectively administer this one. The University has a good history of compliance with grant schedules, adherence to terms and agreements, and timely and efficient reporting to all state, federal, and local agencies.



**The University of Utah, Utah
FY24 Brownfield Cleanup Grant
Threshold Criteria**

Threshold Criteria

1. Applicant Eligibility

- a. The University of Utah (University) is a public, nonprofit educational institution Exempt under Section 501(c)(3) of IRS code. The University's IRS Tax Exemption Letter is attached to this application.
- b. The University of Utah, is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The University affirms that the SLC Station Center site located at 550 and 570 West 400 South has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The University affirms that it does not have an open Multipurpose Grant.

4. Site Ownership

The University of Utah Research Foundation, a 501(c)(3) charitable and support organization formed solely for the benefit of, and wholly controlled by, the University of Utah, acquired the property on **August 11, 2021**.

5. Basic Site Information

- a) Site Name: SLC Station Center
- b) Site address: 550 and 570 West 400 South, Salt Lake City, UT 84101

6. Status and History of Contamination at the Site

- a) The site is contaminated with hazardous substances.
- b) The 1.89-acre site at 550 and 570 West 400 South hosted residential homes and a multi-tenant building from 1898 to 1911. Since 1911 the site has been used for numerous industrial uses including a cleanser (soap) company, poultry processing, automobile and heavy equipment repair, heating plant, and a paint shop. The site was most recently occupied by WRR Industries, Inc., a landscaping and erosion control contractor, who used the buildings on the property for office space; dry storage of miscellaneous new and old stock materials such as auto parts, landscaping equipment, and vehicle storage; and diesel truck repair. Since the University took ownership, the site has sat vacant.
- c) The site has soil and groundwater impacts in the form of polycyclic aromatic hydrocarbons (PAHs) and volatile organic compounds (VOCs) that are above the industrial/ residential EPA Regional Screening Levels (RSLs). Groundwater has been impacted by tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (DCE), and vinyl chloride (VC) above EPA maximum contaminant levels (MCLs) and Vapor Intrusion Screening Levels (VISLs). Soil gas has been impacted by PCE and TCE above VISLs.
- d) The site shows evidence of historical releases (over 40 years) from past industrial operations that include leaking, spilling, solvent use, waste storage and disposal, wastewater discharge, and staining. The overall vertical and lateral extents of contamination have been generally identified, with the VOC-impacted groundwater generally occurring on the

southeastern portion of the site.¹ The VOC-impacted soil gas extends farther onto the northern and western portions of the site.¹

7. Brownfields Site Definition

The University affirms that the site is:

- a) NOT listed (or proposed for listing) on the National Priorities List (NPL);
- b) NOT subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c) NOT subject to the jurisdiction, custody, or control of the US government.

8. Environmental Assessment Required for Cleanup Grant Applications

The following site assessment reports have been completed for the site at 550 and 570 West 400 South:

- Phase I Environmental Site Assessment, June 24, 2021
- Site Characterization Report, April 18, 2023
- Phase II Site Characterization Report, October 3, 2023

9. Site Characterization

b. The SLC Station Center site at 550 and 570 West 400 South is currently enrolled in a state voluntary response program (Utah Department of Environmental Quality, Division of Waste Management and Radiation Control [DWMRC] Environmental Cleanup Program). A letter from the State of Utah Voluntary Cleanup Program is included in this application that:

- i. affirms that the site is eligible to be enrolled in the DWMRC Environmental Cleanup Program;
- ii. indicates that the site can remain enrolled in the DWMRC Environmental Cleanup Program for brownfield regulatory oversight purposes; and
- iii. indicates that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin.

10. Enforcement or Other Actions

The University affirms there is not any ongoing or anticipated environmental enforcement actions relating to the property at 550 and 570 West 400 South.

11. Sites Requiring a Property-Specific Determination

The University affirms that the SLC Station Center site at 550 and 570 West 400 South does not require property-specific determination to be eligible for EPA Brownfields Grant funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes

Not Applicable.

¹Terracon (October 2023). Phase 2 Site Characterization Report, SLC Station Center, 550 and 570 West 400 South, Salt Lake City, Salt Lake County, Utah. October 3, 2023.

(2) Alaska Native Village Corporations and Alaska Native Regional Corporations

Not Applicable.

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

Not Applicable.

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY**(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002**

Not Applicable.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**(1) Bona Fide Prospective Purchaser Liability Protection****(a) Information on the Property Acquisition**

- (i) The University acquired the property by negotiated purchase from a private owner.
- (ii) The University acquired the property on **August 11, 2021**.
- (iii) The University is the sole owner of the property and has fee simple title.
- (iv) The University purchased the property from the previous owner: 216 Development, LLC.
- (v) The University does NOT have familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators of the site.

(b) Pre-Purchase Inquiry

Environmental professionals interviewed John Seastrand, owner of 216 Development, LLC, as part of the most recent Phase I assessment on June 24, 2021. Mr. Seastrand acquired the property in April 2019 and owned it until the University acquired the property in August 2021.

- (i) The following environmental site assessments were performed prior to the University's purchase of the property:
 - Terracon 2017. Limited Site Investigation, 217 Development, LLC. December 15, 2017.
 - Terracon 2018. Phase I Environmental Site Assessment, WRR Industries, Inc. January 3, 2018.
 - Environmental Contractors Incorporated (ECI) 2020. Corrective Action Summary Report, WRR Industries, Inc. October 1, 2020.
 - Terracon 2021. Phase I Environmental Site Assessment, SLC Station Center. June 24, 2021.
 - Environmental Contractors Incorporated (ECI) 2021. Phase II Corrective Action Summary Report, WRR Industries, Inc. December 28, 2021.
- (ii) Terracon Consultants performed the Phase I Environmental Site Assessments. Phase I ESA was performed by Tina Cheney (ESA Group Manager). Tina stated that she

meets the definition of Environmental Professional as defined in Section 312.10 of 40 CFR at the time of the report.

- (iii) The most current Phase I ESA (June 24, 2021) was conducted within 180 days of the acquisition of the property.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before the University acquired the property. The University has not caused or contributed to the release of any hazardous substances on the property. The University has not, at any time, arranged for the disposal of hazardous substances at the property or transported hazard substances to the property.

(d) Post-Acquisition Uses

The property has not been used by the University since taking ownership on August 11, 2021. From August 2021 to January 2023, the property was rented to WRR Industries, Inc., a landscaping and erosion control contractor. WRR Industries closed its business in early January 2023 and the property has been vacant since January 3, 2023.

(e) Continuing Obligations

(i) There are no known continuing releases at this time. Based on the planned cleanup and reuse of the site and typical DWMRC Environmental Cleanup Program requirements, any residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions and a Site Management Plan, thus fulfilling the University's continuing obligations in regard to current releases of known hazardous substances found at the site.

(ii) The University will exercise appropriate care with hazardous substances found at the site by taking reasonable steps to prevent any future releases. No business operations have taken place at the site since the former business tenant (WRR Industries) vacated the site on January 3, 2023. No chemicals are currently stored at the property, the building is vacant, and has been locked. Terminating business operations at the site has stopped the potential for any continuing releases, prevents any threatened future releases, and the locked building prevents exposure to the previously released hazardous substances within the building. Approximately 90% of the site is capped by the paved parking lot, the main building, and an outbuilding. The small remaining uncapped area is enclosed by a locked fence preventing public access and eliminating any threatened future releases at the property and preventing exposure to previously released hazardous substances on the exterior of the building. The planned cleanup activities will further prevent future releases. The University intends to use Cleanup Grant funds to remove impacted soils, treat impacted groundwater, and install a vapor mitigation system, effectively limiting exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical requirements of the Utah VCP program and DWMRC Corrective Action Program, any residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions and a Site Management Plan, thus fulfilling the University's continuing obligations in regard to future releases of known hazardous substances found at the site.

(iii) By preventing public access to the site, the University exercised appropriate care and took reasonable steps to prevent or limit exposure to any previously released hazardous

substances. The planned cleanup activities will further prevent and limit exposure to previously released hazardous substance. The University intends to use Cleanup Grant funds to remove impacted soils, treat impacted groundwater, and install a vapor mitigation system, effectively limiting exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical requirements of the Utah VCP program and DWMRC Corrective Action Program, any residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions and a Site Management Plan, thus fulfilling the University of Utah's continuing obligations in regard to preventing and limiting exposure to past releases of known hazardous substances found at the site.

The University confirms its commitment to:

- (i) comply with any necessary land use restrictions and not impede the effectiveness or integrity of any institutional controls;
- (ii) assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) comply with information requests and administrative subpoenas that may be issued in connection with the property; and
- (iv) provide all legally required notices.

13. Cleanup Authority and Oversight Structure

The University will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment.

a. The University intends to maintain enrollment in the DWMRC Corrective Action Program. The University will hire a qualified environmental contractor with brownfields experience prior to implementing remediation activities. The contractor will provide the technical expertise required to conduct, manage, and oversee the cleanup. The University will comply with competitive procurement provisions of 2 CFR §§ 200.317 through 200.327 and ensure that this technical expertise is in place prior to beginning cleanup activities.

b. The site is bound on its south side by West 400 South Street and on its west side by South 600 West Street. Both of these are public thoroughfares and as such, are accessible during cleanup activities. In the event that access becomes necessary to the east adjoining property or the north adjoining property, these adjoining properties are owned by public entities (Salt Lake City Corporation and the Utah Transit Authority, respectively) and the University does not anticipate difficulties obtaining access agreements to these properties.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

The University announced their intent for cleanup funding for the 550 and 570 West 400 South site and the proposed redevelopment on **October 23, 2023**. A draft ABCA for the site and this proposal was made available at this time for public review and comment. These documents summarize information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered; and
- the proposed cleanup.

b. Community Notification Ad

A request for public input was published on **October 23, 2023**, in The University's webmail publication "@TheU" (<https://attheu.utah.edu/announcements/university-pursues-brownfield-grant-for-downtown-property/>). A copy of this grant application, including a draft ABCA was made available for public review and comment. The University chose to use the "@TheU" web publication instead of the local newspaper because "@TheU" has higher readership than the local newspaper and the local newspaper has a paywall.

c. Public Meeting

A brownfield and revitalization presentation was made during a public hearing via video conference on **October 26, 2023, at 4:00 pm Mountain Daylight Time**. This live meeting was recorded for future use. The University documented participant attendance at the meeting. Comments were received until **November 9, 2023**.

d. Submission of Community Notification Documents

The following community notification documents are included as an attachment to this proposal:

- a copy of the draft ABCA;
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at least **14 days** before the application was submitted to the EPA.
- a copy of the meeting attendance sheet and meeting agenda.
- Since the University did not receive any comments from the public nor did the public attend the public meeting, the University is not submitting meeting notes or responses to public comments.

15. Contractors and Named Subrecipients

Not applicable.



**The University of Utah, Utah
FY24 Brownfield Cleanup Grant
Threshold Criteria
Eligibility Information/Documentation**



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Kimberly D. Shelley
Executive Director

Ty L. Howard
Deputy Director

ERRC-186-23

November 6, 2023

Michael Brehm, P.E., Associate Director
Department of Environmental Health and Safety
University of Utah
125 South Fort Douglas Boulevard
Salt Lake City, Utah 84113

**RE: Support Letter – SLC Station Center Property
Salt Lake City, Salt Lake County, Utah
EPA Brownfields Program Cleanup Grant**

Dear Mr. Brehm:

Thank you for involving the Department of Environmental Quality (DEQ) in the University of Utah's (University) planning discussions regarding the University's application for a U.S. Environmental Protection Agency (EPA) Brownfields Program Cleanup Grant for the SLC Station Center property located at 550-570 West 400 South, Salt Lake City, Salt Lake County, Utah. The grant will help the University clean up contaminants on the property and facilitate redevelopment into a commercial development project, possibly including research space consistent with an Innovation District concept. The DEQ believes the cleanup is a significant step in revitalizing properties and is committed to seeing Brownfields-caliber sites remediated and redeveloped wherever possible.

The DEQ supports the University in its application for an EPA Brownfields Program Cleanup Grant and believes, based on the current information available, there is a sufficient level of characterization to proceed with the cleanup work under the grant. The benefits of remediation include removing the potential stigma associated with the impacted property, protecting public health, and reclaiming valuable property for economic development and future, sustainable growth. The University has indicated it will continue to enroll the SLC Station Center property in the Environmental Cleanup Program administered by the DEQ/Division of Waste Management and Radiation Control. As noted during our previous conversations, the DEQ is committed to assisting the University with this site moving forward.

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We look forward to continuing our partnership with the University to assess, cleanup, and return this property to a higher and more productive use. Should you have any questions, please contact Joe Katz of the Division of Environmental Response and Remediation at (801) 536-4100, or Paige Walton of the Division of Waste Management and Radiation Control at (385) 515-0086.

Sincerely,

A handwritten signature in cursive script that reads "Kimberly D. Shelley".

Kimberly D. Shelley
Executive Director

KDS/JHK/jn

cc: Angela Dunn, MD, MPH, Executive Director, Salt Lake County Health Department
Paige Walton, Division of Waste Management and Radiation Control