

From: [Melissa Anderson](#)
 To: [Melissa Anderson](#)
 Subject: Request for Information (RFI) regarding 684 East 10000 South in Ground Water Protection Zone
 Date: August 7, 2023 10:02 AM
 Attachments: [Request for Information \(RFI\) regarding 684 East 10000 South in Ground Water Protection Zone](#)

Hi Austin,
 The applicant for the [Leak Assessment](#) in the 3D-Carnation zone, Adam Nash, just submitted the email below and has asked it be submitted to the City Council for the meeting tomorrow evening.
 Thank you,
 Melissa



From: Adam Nash <adamnash2022@gmail.com>
 Sent: Monday, August 7, 2023 10:02 AM
 To: Melissa Anderson <melissaanderson@sandy.utah.gov>
 Cc: Adam Nash <adamnash2022@gmail.com>; Scott Ruback <scott_ruback@harrandsco.com>; Wayne Petty <wpetty@agcl.com>; Ryan Johansen <ryanjohansenph@hotmail.com>; Troy Johnson <troyjohnson@probandy.com>
 Subject: UST REGULATORY REQUIREMENTS FOR UST IN Ground Water Protection Zones

Melissa,

Please provide this letter to the Sandy City, City Council before the Work Shop tomorrow.

Regarding ordinance amendment 684 East 10000 South in the Carnation Zone/Ground Water Protection Zone 3-4

The DEQ Map at the bottom of the page shows **virtually all of Sandy City is in some Ground Water Protection Zone.**

Zone one is a 100-foot radius around a groundwater source (well or spring). Zone two is a 250-day groundwater time of travel, zone three is a 3-year groundwater time of travel, and zone four is a 15-year groundwater time of travel.

Utah DEQ UST

Our site is located in Zone 4. Zone 4 is a 15-year groundwater time of travel. This means a release at this location would take 15 years to reach the source. This is an extremely long amount of time for a release to go undetected. BMP requires tank monitoring, line leak detection and double walled tanks. These protection measures as well as regular inspections and reports accounting for inventory.

Commercial UST are a Permitted Use in Zone 3-4. Commercial UST are a Conditional Use in Zone 3-4.

Gasoline service stations including underground storage tanks is a Conditional Use in Zone 3 and 4.

18.115.060 identifies uses that have varying potentials to contaminate groundwater sources. These uses have been classified according to the risk of contamination in each protection zone as follows:

- (a) Permitted Uses (P). The risk of contamination is considered relatively low in the specified zone if regulatory requirements and best management practices are implemented and, therefore, the use is permitted.
- (b) Conditional Uses (C). The risk of contamination is moderate in the specified zone. The planning commission may permit the use only after conditional use review and approval. Approval is subject to implementation of best management practices and the planning commission may establish compliance with other reasonable conditions. The Utah Division of Drinking Water Quality shall review all conditional use requests.
- (c) Prohibited Uses (X). The risk of contamination is very high in the specified zone. The use is not permitted.

Table 18.115.620
Use Matrix for Potential Contamination Sources

Potential Contamination Source	Protection Zone					Prohibitions	Best Management Practices
	Required Recapture	Zone 1	Zone 2	Zone 3	Zone 4		
Remediation work	X	C	X	C	X	UFC 192C4 (D 1 to I 2.2 for installations by detection wells)	
Agricultural practices, herbicide, and fertilizer storage, use, filling, and mixing areas	C	C	X	C	C	UFC 192C4 (D 1 to I 2.2 for installations by detection wells)	Department of Agriculture
Apex of maintenance and loading dock	C	C	X	C	C		Stormwater UST
Appliance repair	P	P	X	P	P	RCMA Subtitle C	
Auto services and best vehicle facilities (commercial)	C	C	X	C	C		Salt Lake Valley Health Department
* Cleaning, maintenance equipment						RCMA Subtitle C; UST; Permitment	
* Tire							
* Tires/tyres							
* Engine repair							
* Fluid changing							
* Oil and lube shops						Utah Oil (UAC 1915.04)	
* Vehicle rental with maintenance							
Beauty salons	C	P	X	C	P		
Bike loading and refueling	C	P	X	C	C	RCMA Subtitle C	
Car washes	C	P	X	P	P	Permitment	Utah Dept of Environmental Quality
Canneries, gift baskets, jams, and other preserves	C	C	X	C	C	UFC 192C4	
Chemical distribution facilities	C	C	X	C	C	RCMA Subtitle C	
Chemical tanks	C	C	X	C	C	DES	
Chemicals, health, and lab containers	C	C	X	C	C		
Chemicals and animal feed (dry cows feed to lactating cows)	C	P	X	X	P	UFC 192C4 (D 1 to I 2.2)	
Dry cleaners (with on-site chemicals)	C	C	X	X	P	RCMA Subtitle C; Permitment	Salt Lake Valley Health Department
Dry cleaners (without on-site chemicals)	P	P	X	P	P		
Drinking services	C	C	X	C	C	Permitment	
Dry cleaning							
* Drying sites	X	C	X	C	C	Utah Oil (UAC 1915.04); Salt and Hazardous (RCMA Subtitle C)	
* Maintenance garages	C	C	X	C	C	Utah Oil (RCMA Subtitle C)	
* Motor pools (1000 gallons or more)	C	C	X	C	P	UFC 192C4 (D 1 to I 2.2)	
* Motor pools (1000 gallons or less)	C	C	X	C	C	Construction (UAC 1915.04)	
Food processing (not using and/or weighing)	C	C	X	X	P	UFC 192C4 (D 1 to I 2.2)	
Food processing (using and/or weighing)	X	C	X	C	C	Permitment	
Food, oil, and heating oil distribution and storage facilities	C	C	X	C	C	Subdivision (I) through (J) of this section	
Furniture shipping, leasing, and framing businesses	C	C	X	C	C	RCMA Subtitle C	
Gasoline service stations (including underground storage tanks)	C	C	X	C	C	Local zoning and best management practices	
Health and medical offices and veterinary offices	C	C	X	C	C	DES and Hazardous	
Industrial manufacturers of herbicides, paper products, leather, plastics, textiles, rubber, shoes, etc.	X	C	X	C	C	Subdivision (I) through (J) of this section; UST; RCMA Subtitle C	
Industrial manufacturers of plastic, paint, pigments, dyes, etc.							
Industrial manufacturers of paint, pigments, dyes, etc.	X	C	X	X	C	Construction (UAC 1915.04); RCMA Subtitle C	
Junk and salvage yards	X	C	X	C	C		Salt Lake Valley Health Department
Landfills and transfer stations	X	C	X	C	P	DES; State Water Reclamation (UAC 1915.04) (I) through (II) of this section; RCMA Subtitle C	
Landscape	C	P	X	P	P	Permitment	
Mechanics shops, metal shops, fast loading assembly, air washing, and cleaning facilities	C	C	X	C	C	RCMA Subtitle C	
Mining operations							
* Geological	C	C	X	P	P	UAC 1915.04; Construction (UAC 1915.04)	
* Sand and gravel processing	C	P	X	P	P	Construction (UAC 1915.04)	
Multiple wastewater treatment plants	C	C	X	X	P	DES/DES/Design Requirements for Treatment, Collection, Treatment, and Disposal Systems (UAC 1915.04)	
Plastic processing and paint shops	C	C	X	C	C	Permitment	
Refrigerant sales	C	P	X	P	P	Utah Oil	
Refrigerant practices, herbicide, and fertilizer storage, use, filling, and mixing areas	C	P	X	C	C		Utah Manufacturer's Reporting for Use and Storage
Refrigerated underground storage tanks	X	C	X	C	P	UAC 1915.04; 1915.05; 1915.06	
RV camp (repair) business	C	C	X	P	P	UAC 1915.04	
Salt and sand mixed piles	C	C	X	C	C	Subdivision (I) of this section	DEQU/DT
Septic tank drain field systems	X	C	X	X	C	UFC 192C4; Individual Manufacturer; Design Systems (UAC 1915.04)	
Shredder collection bins and snow storage bins	C	C	X	C	P		
Tire (chemical storage and fill) operations	X	X	X	X	X	Subdivision (I) through (J) of this section	
Wood processing (best management practices)	X	C	X	C	C		

Permitment: UAC 1915.04 (I) - (J)
 UST: Utah Division of Drinking Water
 RCMA: Resource Conservation and Recovery Act
 UDCWQ: Utah Division of Drinking Water Quality

(2) Storage Containers. All regulated substances shall be stored in suitable containers to reduce the chance for the substances to be accidentally introduced into the environment. These storage containers shall be product-tight and, except where provided elsewhere in this chapter, shall be provided with a means to control spillage (primary containment) and to contain or drain off spillage and fire-protection water discharged in the storage area (secondary containment).

Storage containers which are stored outside must be covered or mounted to prevent the accumulation of rain or other water on the top of the container, or the degradation of the top, sides or bottom of the container, in a manner that would lead to the reduction of the integrity of the container. Defective storage containers shall be removed from service for repair or disposal in accordance with local, state, and federal standards.

(3) Secondary Containment. Where secondary containment is required, it shall be constructed of a material of sufficient structural integrity and composition to contain the required capacity of liquids and not be structurally weakened as a result of contact with the discharge of the regulated substance to be contained. The material shall be free of cracks, joints, gaps, or other imperfections that would allow leakage through the containment material.

The secondary containment system shall have sufficient capacity to contain (a) 10 percent of the volume of all containers and 100 percent of the volume of the largest single container, whichever is greater, plus (b) the design flow rate of the automatic fire extinguishing system (for 20 minutes) for the area or room in which the storage is located. If the storage area and/or containment area is open to rainfall, the secondary containment system must also accommodate the volume of a 24-hour rainfall as determined by a 25-year storm frequency. Liquid that accumulates in the secondary containment system shall be removed in a timely manner as necessary to prevent overflow of the system. Nonhazardous liquids may be drained in accordance with applicable local regulations. If the collected material is a hazardous waste under 40 CFR 261, it must be managed as a hazardous waste in accordance with all applicable requirements of 40 CFR 262 through 266.

Vacuum suction devices, absorbent scavenger materials or other devices approved by the department shall be present on site or available to facilitate the removal or further containment of spilled regulated substances. Devices or materials shall be available in sufficient magnitude so as to at least control and collect the total quantity of regulated substances that the containment system is designed to contain. Emergency containers shall be present and of such capacity as to hold the total quantity of regulated substances plus absorbent material.

(4) Regulated Substances Emergency Management Plan. An emergency plan shall be prepared and filed with the department, the fire department, the police department, and the PWS indicating the procedures that will be followed in the event of the release of a regulated substance so as to control and collect all such spilled material in such a manner as to prevent it from discharging into any storm or sanitary drains or the ground. Facilities which have had, or appear to have had, unauthorized discharges to soil or groundwater shall be required by the department to submit a regulated substances management plan for the facility. The written plan will be used to demonstrate to the department that the facility owner or operator understands the procedures and has the proper equipment to handle regulated substances within the guidelines of this chapter. The plan should not be implemented without the approval of the department.

(5) Reporting of Spills. Any spill of a regulated substance in excess of the nonaggregate quantity thresholds established by the list of hazardous waste (40 CFR 261, Subpart D), 40 CFR 261, Appendix VIII, Hazardous Constituents, and EPA Designation Reportable Quantities and Notification Requirements for Hazardous Substances under CERCLA (40 CFR 302) shall be reported by telephone to the city and designated water utility within one hour of discovery of the spill. Cleanup shall commence immediately upon discovery of the spill. A full written report shall be submitted to the city within 10 days of discovery of the spill.

(6) Best Management Practices. Under the provisions of this chapter, all potential contamination sources within the city's boundaries shall incorporate and utilize best management practices (BMPs) in their operations. BMPs that reduce the potential for spills and leaks at a site to occur and enter groundwater shall be construed within the context of this chapter to include, but not be limited to, structural and nonstructural practices, conservation practices, and operation and maintenance procedures as specified by the Utah Department of Drinking Water Quality and the U.S. Environmental Protection Agency.

(7) Underground Storage Tanks. Installation of any new underground storage tanks used to store regulated substances for either residential or nonresidential activities in recharge areas and protection zones designated under RCC 18.115.040(2) and (3) shall require a secondary containment system for the tank and associated underground piping, and an automatic leak detection system.

