



Threshold Criteria

1. Applicant Eligibility

- a. Salt Lake City Corporation (the City) is eligible to apply for the EPA Brownfields Cleanup Grant as a local government as defined under 2 CFR § 200.64.
- b. Salt Lake City Corporation is not a 501(c)(4) organization.

2. Previously Awarded Cleanup Grants

The City affirms that the Former Salt Lake City Public Safety Center (“Northwest Pipeline Building”) site located at 315 East 200 South has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

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

4. Site Ownership

In 1988, Pacific Northwest Realty Corp conveyed the property to the Municipal Building Authority of Salt Lake. The Municipal Building Authority was legally a separate entity from the City but was part of the City for practical purposes. This entity was blended as an integral part of the primary government and its funding was included in the City’s annual budget. The sole purpose of the Municipal Building Authority was to serve the City as a financing agency for debt financed projects. Furthermore, Salt Lake City Council served as the Board of Directors of the Municipal Building Authority.

In 2013, the property was transferred to Salt Lake City Corporation after the dissolution of the Municipal Building Authority of Salt Lake. This property transfer was an administrative action between two different City entities and does not constitute an ownership change. The City will retain ownership while the Brownfields Cleanup Grant funds are disbursed for clean-up. Please see the 1988 Warranty Deed and the 2013 Quit Claim Deed attached.

5. Basic Site Information

- a) Site Name: Northwest Pipeline Building
- b) Site Address: 315 East 200 South, Salt Lake City, Utah, 84111

6. Status and History of Contamination at the Site

- a) This site is contaminated by hazardous substances (i.e., asbestos).
- b) The target site Building was originally built between 1957-1958 to be office space for the Pacific Northwest Pipeline Company's headquarters. The 8½-story building's footprint measures approximately 150 feet long by 82 feet wide, with 95,000 square feet of interior space. The Pacific Northwest Pipeline Company left its headquarters in the late 1970s after a prolonged anti-trust court case affected expected growth, and in 1988 the deed was transferred to the City. The City remodeled the interior and converted the building to be their Public Safety Center. In April 2011, the building was added to the National Register of Historic Places as an example of American architect Slack Winburn’s work in the International style. In 2013, the City moved its Public Safety Center to a newly constructed building, citing the now-poor interior condition of 315 East 200 South. The building has remained vacant since this departure.
- c) Through inspections conducted in 1987, 2015 and 2016, the City has identified various asbestos containing materials (ACM) inside the building. These materials require removal to facilitate the renovation of the building into low-income housing use.



- d) The site contaminants were built into the structure, to the fireproofing, safety, and construction standards of the time. The reports indicated the following ACM present: boiler gaskets, door insulation, duct caulking, exterior caulk gasketing, spray-on fireproofing, floor tile and mastic, flooring adhesive, floor-leveling compound, lab countertop, lath and plaster, roofing material (penetration flashing), wall systems, sink under coatings, thermal system insulation, vapor barrier (black tar), and window glazing. While the materials are in relatively good condition, the building will be entirely renovated for conversion to low-income housing use, with interior materials being removed down to the structural materials or those required to remain in-tach due to historic designation.

7. Brownfield Site Definition

The Site is a Brownfield because its redevelopment and reuse is complicated by the presence of ACM that must be removed, the cost of which is prohibitive to potential buyers. The site has been vacant since 2013 because of this condition. The City affirms that the site is:

- NOT listed (or proposed for listing) on the National Priorities List (NPL);
- 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;
- 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 315 East 200 South:

- Asbestos Abatement, Removal and Disposal, June 8, 1987
- Hazardous Materials Inspection and Universal Wastes Summary, July 23, 2015
- Phase I ESA ASTM E1527-13, December 17, 2015
- Asbestos and Universal Waste Re-inspection, June 2, 2016
- Phase I Environmental Site Assessment, September 27, 2024

9. Site Characterization

- b. The target building site at 315 East 200 South is eligible to be enrolled in the state voluntary response 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 Utah Voluntary Cleanup Program (VCP);
 - ii. Although eligible, the City does not intend to enter the VCP because the site is impacted by asbestos only, which has not been released outside the building. Therefore, the cleanup will be conducted in accordance with the Utah Division of Air Quality following regulation R307-801; and
 - iii. There is a sufficient level of site characterization from the environmental site assessment to determine the cleanup requirements, however, under the Utah Division of Air Quality following regulation R307-801-9, an updated asbestos survey is required to be conducted within three (3) years of abatement beginning. Therefore, the City will obtain an updated survey prior to June 15, 2025.

10. Enforcement or Other Actions

The City affirms there are no known ongoing or anticipated environmental enforcement or other actions relating to the property at 315 East 200 South.

11. Sites Requiring a Property-Specific Determination



The City affirms that the Northwest Pipeline Building at 315 East 200 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

ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability

(1) Publicly Owned Brownfield Site Acquired Prior to January 11, 2002: 315 East South 200 was acquired by the City in 1988, prior to January 11, 2002, and is eligible for Brownfields Grant funding.

- (a) The City acquired the property to be used for its Public Safety Services department offices.
- (b) The City acquired the property in 1988.
- (c) The building was renovated in 1987, with certain asbestos containing materials properly removed and disposed.
- (d) The City did not cause or contribute to any release of hazardous substances at the property.
- (e) The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iv. Sites with Hazardous Building Material That is Not Released into the Environment

(1) The City affirms there has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions. The City was aware of asbestos in building at purchase and took appropriate measures during the course of ownership to properly manage ACM during regular maintenance activities. The City has managed the ACM in the building by conducting general awareness training and utilizing properly licensed contractors when small abatement projects were needed during the time they occupied the building. Since their departure from the building in 2013, the Site has remained secured, and no releases of ACM have been documented or reported

13. Cleanup Authority and Oversight Structure

Salt Lake City will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment.

- a. Cleanup will be done in accordance with the Utah Division of Air Quality following regulation R307-801
- b. No offsite access will be necessary.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

A draft EPA application and ABCA, along with the proposed redevelopment and cleanup activities for the Target Site were discussed at the Public Meeting held on October 28, 2024. The community is also provided access to the draft ABCA in hardcopy at the Housing Authority of Salt Lake City's public offices and online at <https://www.slc.gov/sustainability/the-grove-brownfield-grant-application/>.

The draft ABCA is attached to this application.

b. Community Notification Ad

The Public Meeting was held October 28, 2024, and Community Notification ads were published in English and Spanish on October 20, 2024, by The Salt Lake Tribune, and on October 23, 2024, by The Deseret News. The ad was shared via The City of Salt Lake's social media and website, and the Housing Authority of Salt Lake's social media and website. Copies of the Notification were also sent directly to



be shared by Salt Lake City Council Staff, the Downtown Community Council, and the Downtown Alliance.

A copy of the Community Notification Ad is attached.

c. Public Meeting

The Public Meeting was held in person at the Housing Authority of Salt Lake City's October 28, 2024 Board Meeting.

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,
- The comments received,
- The City's response to the comments,
- The Public Meeting notes summary; and
- Meeting sign-in sheet.

15. Contractors and Named Subrecipients

Not Applicable.