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May 6, 2013

Ms. Tina LePage  
Waste Programs Division  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, Arizona 85007



**RE: COMMENTS TO THE WEST VAN BUREN WQARF SITE WORKING GROUP'S MARCH 2013 FEASIBILITY STUDY WORK PLAN**

Dear Ms. LePage:

JBR Environmental Consultants, Inc. (JBR) is pleased to present these comments on behalf of Chevron for the above-referenced document.

In the West Van Buren WQARF Site Working Group's March 2013 Feasibility Study Work Plan ("Work Plan"), it states that concentrations of TCA and TCE were detected slightly greater than detection limits in a soil sample collected at the Chevron U.S.A., Inc. facility located at 3050 South 19th Avenue ("Chevron Site"), as part of a Phase I investigation (See Page 16, second bullet item, of the Work Plan). The Work Plan references this information to Terranext's August 2012 Remedial Investigation Report for the West Van Buren (WVB) WQARF Registry Site as the basis for its statement regarding TCA and TCE at the Chevron Site, which-in-turn, references this information to Kleinfelder's July 1989 Phase I Report for the WVB Area ("Kleinfelder Report"), which was the original document presenting these sample results.

However, this information is incorrect and there have never been any TCA or TCE detections at the Chevron Site. Chevron notified the ADEQ in its letter dated January 30, 1989, that the sample referenced by Kleinfelder had in fact been collected from the neighboring Research Chemical facility (see enclosure). The Chevron January 30, 1989 letter also indicates that HVOCs were never stored or used at the Chevron Site.

On behalf of Chevron, JBR requests that the reference to the soil sample collected from the Chevron facility located at 3050 South 19th Avenue be removed from the WVB WQARF Site Working Group's Feasibility Study Work Plan.

If you have any questions or require additional information, please contact me at (480) 820-0457, or mminter@jbrenv.com.

Sincerely,

A handwritten signature in cursive script that reads "Martin J. Minter".

Martin J. Minter, PG, RG, CRS, CEM  
Senior Geologist/Environmental Project Manager  
JBR Environmental Consultants, Inc.

Enclosure: Chevron's Letter to the ADEQ, dated January 30, 1989



However, Chevron has we have experienced petroleum releases at this site. Chevron has responded promptly on its own to stop the source, investigate the extent, and begin remediation of this hydrocarbon contamination. Chevron hasWe have been open with the ADEQ and diligent regarding our actions to remediate these hydrocarbons and will continue to do so. Chevron is extremely concerned that the ADEQ lumps Chevron with the sources of HVOCs that have clearly migrated under our site from upgradient sources, some of whom are miles away. The sources are many and are clearly upgradient as indicated by the Klienfelder Report. This HVOC contamination is a separate regional problem from the isolated hydrocarbon contamination which Chevron is handling individually.

Chevron requests that corrections be made in the final report to reflect our comments. If you have any questions regarding these items, please contact Mr. D. J. (Daniel) Lynch, at (213) 694-9482.

Very truly yours,

CHEVRON U.S.A. INC



R. H. Zink  
Regional Manager

DJL/jac/2-44A