

Univar USA Inc.  
1804 N. 20<sup>th</sup> Street  
Nampa, ID 83687

T 208 888 1094  
F 208 884 1602

www.univarusa.com



December 29, 2008

Ms. Jennifer Edwards Thies, Project Manager  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, AZ 85007



Re: Univar USA Inc.'s Comments  
Draft Remedial Investigation Report  
West Van Buren Area WQARF Site  
Phoenix, AZ

Dear Ms. Thies:

Univar USA Inc. has reviewed the draft Remedial Investigation Report for the West Van Buren Area WQARF Site. Our review has identified a number of sites where additional discussion and/or clarification would be most helpful in ensuring the appropriate remedy(s) are evaluated. In addition, there are a number of sites identified in the RI report where investigative activities requested by the ADEQ have not been completed or even initiated. These need to be completed.

If you have any questions related to our comments, or wish to discuss any of them in more detail, please contact our consultant, Gail Clement, G.M. Clement Associates, at 480-314-9499, or myself at 208-888-1094.

Sincerely,

A handwritten signature in black ink that reads "Michael Gaudette".

Michael Gaudette  
Senior Project Manager

cc: James Hooper, Univar, Director, Environmental Affairs  
Julie Riemenschneider, Manager, ADEQ Remedial Projects  
Gail Clement, G.M. Clement Associates

**West Van Buren Area WQARF Site  
Draft Remedial Investigation Report  
Univar USA Inc. Comments**

<b>General Comments</b>		
1		The West Van Buren Area (WVBA) WQARF Site, Draft Remedial Investigation (RI) Report is a good summary of much of the available historical data and a good central source of information. The Report presents the facts in a comprehensive and understandable format.
2		While the Report presents the historical data, there is limited interpretation and analysis of the data. A detailed discussion of the Site Conceptual Model (SCM) appears to be absent. By clearly laying out the complete big picture, the SCM illustrates how the situation was created and what has happened in the interim to enable selection of an appropriate remedy. The SCM includes the mechanisms causing changes in contaminant concentrations and distribution over time. For example, early source removal in the WVBA has contributed to decreasing contaminant concentrations in WVBA groundwater; while in contrast, contaminants continue to enter the Site along the eastern boundary from the Motorola 52 <sup>nd</sup> Street CERCLA site. Because of the mass input from the adjacent CERCLA site, a mass flux analysis would be helpful in evaluating the most effective remedial options.
3		The concept of “the WVBA groundwater plume” is a simplification of the distribution of contaminants in the groundwater in the WBSA. In reality the WVBSA has a combination of many, commingled plumes with different sources, different timing, different VOCs and differing fate and transport parameters. In addition, a significant portion of the groundwater contamination in the WVBA appears to be related to contamination entering the Site from the east. Using an over simplification could lead to misapplication of an overall remedy for situations and source areas that may benefit from more focused attention.
4		There is no discussion of data gaps and whether any data gaps are problematic to completion of the RI and Feasibility Study.
5		While ADEQ has conducted an area-wide investigation of the WVBA, individual sites, including the Univar site, have completed site investigations and performed source control. This overall approach has been successful in reducing ongoing sources of contamination to groundwater and achieving partial remediation of the groundwater. Univar encourages ADEQ to continue this successful approach in the WVBA WQARF Site.
<b>Specific Comments</b>		
Page	Paragraph	Comment
1-4	5	Replace “Van Waters and Rogers” with “Van Waters & Rogers”.
1-6	2	The Univar facility has never been used for solvent recycling. Warehousing, distribution, repackaging and transporting of industrial chemicals has been performed at the Univar facility.
1-12	2	It is anticipated that any future use of the Central Phoenix Plume Model (CPM) would be of great interest. Interested parties should be included in future efforts, if any, to update, recalibrate and utilize the CPM for FS or other purposes.
2-2 thru 2-5	Numbers: 2, 11, 16, 18, 21, 22, 24, 25, 26, 28, 30, 31, 33,	All of these sites had detectable concentrations of at least one VOC in soil at a time when soil sampling for VOCs did not include procedures to minimize VOC loss during sampling. The presence of VOCs in soil indicates the potential for the presence of an onsite source of VOCs to groundwater.

**West Van Buren Area WQARF Site  
Draft Remedial Investigation Report  
Univar USA Inc. Comments**

	34, 37, 41.	
2-3	Number 12	The facility should complete the investigation requested by ADEQ. What impacts to soil and groundwater have resulted from the dry well and oil/water separator?
2-3	Number 14	Was investigation of the soils and groundwater beneath the drywell conducted? What were the results?
2-3	Number 15	The facility should complete the investigation requested by ADEQ.
2-4	Number 29	The facility should complete the investigation requested by ADEQ.
2-4	35	Has the investigation and excavation been completed? Were there any impacts to soil or groundwater?
2-7	3 <sup>rd</sup> Bullet	Why does the list of 163 wells include wells that were abandoned or never drilled? What is the total number of wells that could be affected by groundwater quality, what are their uses and where are they located?
3-3	5	Why were logs with lithologic descriptions of less than 200 feet excluded? Wouldn't the majority of UAU1 wells be drilled to this depth or shallower?
3-4	4	How do the WVBA UAU lithologic layers correlate with the UAU geology used in the Motorola 52 <sup>nd</sup> Street CERCLA site?
3-9	5	The Report states that water levels have dropped approximately 35 feet, an average of approximately three feet per year since 1993. Over what specific period of time did this occur? Are water level declines continuing?
3-11	1 and 2	Vertical head differences were calculated for a number of well pairs over time. These head differences represent the potential for downward or upward vertical flow, but they do not demonstrate that such flow is occurring. Vertical flow will be dependent on the direction and magnitude of the head differences over time, the geology at any specific location, and the influence of the horizontal gradient. Although the potential for vertical downward flow exists, it is not obvious that the distribution of contaminants in the lower units is due primarily to vertical movement through the geologic units.
4-7	3	The COCs for OU3 include contaminants other than TCA and TCE. The full list of OU3 COCs also includes chloroethane, 1,1-dichloroethane, 1,2-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, tetrachloroethene (PCE), 1,1,2-TCA, vinyl chloride and 1,4-dioxane.
4-8	1	Data also indicate that PCE groundwater contamination originates from the OU3 area east of Seventh Avenue and flows into the WVBA WQARF Site from the east.
4-11 thru 4-12	6, 1 thru 4	The most recent groundwater data reported for the former VW&R site identifies TCE, PCE, 1,1-DCE and TCA concentrations in groundwater collected beneath the site. It should be noted that these concentrations are similar to concentrations found in upgradient wells and there is no evidence that the former VW&R site presents an ongoing source of contamination to groundwater.
5-2	4	Another potential mechanism for the vertical movement of contamination is non-operating production wells that are screened across multiple aquifers. Has an analysis been performed to determine whether production wells could be the source of the observed contamination in deeper units, particularly the MAU?
6.8	Section 6.2	