

# GAMMAGE & BURNHAM

A PROFESSIONAL LIMITED LIABILITY COMPANY

ATTORNEYS AT LAW

TWO NORTH CENTRAL AVENUE

EIGHTEENTH FLOOR

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January 21, 2010



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File No. 3836-4

Mr. Michael Anable  
Policy Advisor - Natural Resources  
Office of the Governor - Executive Office  
1700 W. Washington Street  
Phoenix, AZ 85007-2888

Mr. Benjamin H. Grumbles  
Director  
Arizona Department of Environmental Quality  
1110 W. Washington Street  
Phoenix, AZ 85007

Re: Request for ADEQ Community Involvement Activities under A.A.C. R18-16-405(H)  
Roosevelt Irrigation District's Proposed  
DRAFT Early Response Action

Dear Mike and Ben:

By letter dated August 19, 2009, the Roosevelt Irrigation District ("RID")<sup>1</sup> sent a notice letter and draft legal complaint to 104 potential defendants indicating that RID plans to pursue an environmental claim for alleged groundwater contamination within the geographic confines of the West Van Buren Water Quality Assurance Revolving Fund Site. A number of my Clients received this letter. In addition, RID has proposed to initiate an Early Response Action ("ERA") under Arizona Administrative Code ("AAC") R18-16-405. The proposed ERA is generally described in a document titled "Groundwater Response Action Implementation Plan" (September 25, 2009-DRAFT) which has been submitted to the ADEQ for consideration. In support, RID also submitted a document titled "Work Plan - Roosevelt Irrigation District Early Response Action" (October 5, 2009-DRAFT). (See Attachment 1) This work plan is required under AAC R18-16-405 Early Response Action under Section D, which requires that:

<sup>1</sup> Historically, RID has operated a network of groundwater wells in the West Van Buren Area which have primarily supplied irrigation water to the agriculture industry on the west side of Phoenix, Arizona, and Maricopa County.

“A work plan **shall** be prepared for each early response action.

Each work plan **shall** include:

1. A description of work to be done, a description of known site conditions, and a plan for conducting the work;
2. A description of **community involvement activities** for the early response action under R18-16-404; and
3. A schedule.”

The **Draft** ERA Work Plan submitted by RID reveals the following information on page 25:

**“TASK 5 – DESIGN**

Engineering design will be conducted for several distinct components of the ERA. These include modifications to certain RID wells, improvements to wellhead configurations, improvements to various reaches of the Salt Canal, design of the central groundwater treatment facility, and design of the treated water distribution pipeline. **To the extent required under A.A.C. R18-16-411, all designs will be submitted to ADEQ for approval.** (emphasis added)

**Well Modifications and Wellhead Improvements**

Modification to two deep RID wells, improvements to selected wells to enhance structural integrity, and improvements to wellhead configurations at impacted wells will be evaluated and conducted to the extent required to optimize remedy operations. Specifically, these activities will be designed to prevent potential downward migration of impacted groundwater from the UAU to deeper groundwater zones . . .”

However, without the detail of engineering design and supporting information which is described above in the **Draft** ERA Work Plan, neither the ADEQ nor the 104 potential defendants can adequately review and/or approve the ERA.

It is an admitted fact that RID is the largest groundwater user in the West Van Buren Area and has no legal or practical impediment to continuing to provide irrigation water to its current and historical customer base. The proposed ERA suggests that RID wants to pump 20,000 gallons per minute of groundwater from 14 existing RID wells and treat the groundwater with liquid-phase granulated activated carbon to provide potable water. In addition, RID plans to build a new treatment facility at RID’s Operations Facility near 84<sup>th</sup> Avenue and Van Buren Street and build a new, extensive below grade piping system. This has an estimated Phase I cost between \$111 of

Mr. Michael Anable  
Mr. Benjamin H. Grumbles  
January 21, 2010  
Page 3

\$130 million (net present value) including capital, operation and maintenance costs. At this time, there is no identified user for this amount of potable water.

Although my Clients have not seen the RID's promised Final ERA Work Plan, we can clearly state our unanimous objection to the **Draft RID proposal**. We believe the RID's proposal is unreasonable, unnecessary and not cost-effective. The ADEQ should demand that RID complete the identified engineering design and Final ERA Work Plan for community review prior to any approval of the ERA. **Therefore, my Clients formally requests that ADEQ require a Final ERA Work Plan and that ADEQ (or require RID to) conduct Community Involvement Activities and a hearing as required under AAC R18-16-405(H).**

Simply stated, the RID's proposed ERA is too expensive, captures too much water, pumps from groundwater zones not impacted and changes the use of the RID groundwater from its current legal use for irrigation purposes to a new use as a potable water supply to unidentified users. Of particular note, it clearly does not take into account the current remediation activity and legal obligations within the adjacent areas identified as the "Motorola 52<sup>nd</sup> Street Superfund Site Operable Unit 3" or the "West Central Phoenix Water Quality Assurance Revolving Fund Site." (See Attachments 2 and 3) This proposal is outrageous in its audacity and the RID's ridiculous proposal only works if: 1) ADEQ approves the ERA and 2) the response action costs are available from the potential defendants. The RID's proposed ERA is not designed to address groundwater issues that pose a threat to the human health or the environment but is really designed to further the RID's economic interests at the expense of other parties.

Arizona statues require RID to complete and disclose this work prior to ADEQ's approval under AAC R18-16-411 Design, Implementation, Operation and Maintenance of the Early Response Action or Remedy. Contact me to discuss the RID's requirements for engineering design in a Final ERA Work Plan.

Sincerely yours,

GAMMAGE & BURNHAM P.L.C.

  
By

Jerry D. Worsham II

JDW/clr  
(Attachments)

cc: Ms. Amanda Stone, ADEQ  
Ms. Julie Riemenschneider, ADEQ  
✓ Ms. Jennifer Thies, ADEQ

Mr. Michael Anable  
Mr. Benjamin H. Grumbles  
January 21, 2010  
Page 4

Mr. Herb Guenther, AZ Department of Water Resources  
Mr. Anthony Young, Office of the Attorney General

# ATTACHMENT 1



**MONTGOMERY  
& ASSOCIATES**

Water Resource Consultants

# Work Plan

October 5, 2009

Prepared for:

Gallagher & Kennedy, P.A.

## Roosevelt Irrigation District Early Response Action

West Van Buren Water Quality Assurance  
Revolving Fund Site

DRAFT

# ROOSEVELT IRRIGATION DISTRICT

DIRECTORS  
W. BRUCE HEIDEN, PRESIDENT  
DWIGHT B. LEISTER  
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103 WEST BASELINE ROAD  
BUCKEYE, ARIZONA 85326  
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STANLEY H. ASHBY  
SUPERINTENDENT

October 5, 2009

Julie Riemenschneider, Manager  
Remedial Projects Section  
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY  
1110 West Washington Street  
Phoenix, AZ 85007

**Re: PROPOSED ROOSEVELT IRRIGATION DISTRICT  
EARLY RESPONSE ACTION**

Dear Ms. Riemenschneider:

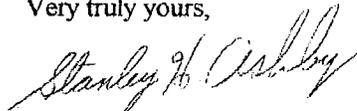
On behalf of the Roosevelt Irrigation District (RID) and its Board of Directors, I am submitting two copies of the following document for the Arizona Department of Environmental Quality (ADEQ) review and approval:

**ROOSEVELT IRRIGATION DISTRICT  
EARLY RESPONSE ACTION WORK PLAN  
WEST VAN BUREN WATER QUALITY ASSURANCE REVOLVING FUND SITE**

As indicated in the RID Groundwater Response Action Implementation Plan submitted to ADEQ on September 24, 2009, this Work Plan is submitted to document the proposed Early Response Action that RID intends to take to address extensive groundwater contamination in the West Van Buren Area (WVBA) WQARF Registry Site and its impact on RID's wells, operation, and water supply. As the largest groundwater provider in the WVBA Site, this Early Response Action is proposed in accordance with A.A.C. R18-16-405 to mitigate the widespread impacts of the groundwater contamination on RID, alleviate the loss or impairment to RID's water supply, and protect public health and the environment.

We very much appreciate ADEQ review of this Work Plan and look forward to the opportunity to answer any questions or respond to comments you may have.

Very truly yours,



Stanley H. Ashby



#### **TASK 4 – PERMITS AND PROPERTY ACCESS**

A substantial portion of the construction work associated with the proposed ERA will take place in existing RID easements. However, it is anticipated that some new permits, property access agreements, and/or easements will be required to construct the ERA components, which will include converting the open sections of the Salt Canal to below-grade pipeline, installing new below-grade pipelines, constructing the treatment facility, improving well sites, and constructing the treated water distribution pipeline.

Preliminary contact has been made with the COP to discuss the ERA project and to assess the level of coordination required for its implementation.

#### **TASK 5 – DESIGN**

Engineering design will be conducted for several distinct components of the ERA. These include modifications to certain RID wells, improvements to wellhead configurations, improvements to various reaches of the Salt Canal, design of the central groundwater treatment facility, and design of the treated water distribution pipeline. To the extent required under A.A.C. R18-16-411, all designs will be submitted to ADEQ for approval.

#### **Well Modifications and Wellhead Improvements**

Modification to two deep RID wells, improvements to selected wells to enhance structural integrity, and improvements to wellhead configurations at impacted wells will be evaluated and conducted to the extent required to optimize remedy operations. Specifically, these activities will be designed to prevent potential downward migration of impacted groundwater from the UAU to deeper groundwater zones, to minimize point source

# ATTACHMENT 2



# Motorola 52<sup>nd</sup> Street Superfund Site

## Operable Unit 3



U.S. Environmental Protection Agency • Region 9 • San Francisco, CA • November 2009

## United States Environmental Protection Agency Signs Agreement with Honeywell International Inc. and Arizona Public Service Company

On September 22, 2009, the United States Environmental Protection Agency (USEPA) signed a Settlement Agreement and Administrative Order on Consent (AOC) with Honeywell and Arizona Public Service Company (APS) to complete a Remedial Investigation and Feasibility Study for Operable Unit 3 (OU3) of the Motorola 52<sup>nd</sup> Street Superfund Site. Honeywell and APS voluntarily agreed to perform the work outlined in the AOC.

The boundaries of OU3 are McDowell Road to the north, 20<sup>th</sup> Street to the east, Buckeye Road to the south, and 7<sup>th</sup> Avenue to the west. Figure 1 below shows OU3 in relation to Operable Units 1 and 2 of the Motorola 52<sup>nd</sup> Street Superfund Site.

A groundwater extraction and treatment system began operation in Operable Unit 1 in 1992. A second groundwater extraction and treatment system began operation in Operable Unit 2 in 2001. Both treatment systems were designed to restrict contaminant migration and reduce the levels of contamination in groundwater.

Groundwater at the Motorola 52<sup>nd</sup> Street site is contaminated with volatile organic compounds (VOCs) such as trichloroethylene (TCE), 1,1,1-trichloroethane (TCA), and tetrachloroethylene (PCE). These chemicals are commercial and industrial degreasers.

### Work to Be Performed

The work that Honeywell and APS will undertake under EPA and Arizona Department of Environmental Quality (ADEQ) oversight includes installing additional groundwater monitoring wells to finish defining the nature and

extent of groundwater contamination in OU3, and installing soil vapor monitoring wells to evaluate the potential for vapors to migrate upward from the groundwater table. Figure 2 shows the approximate locations for groundwater and soil vapor monitoring wells.

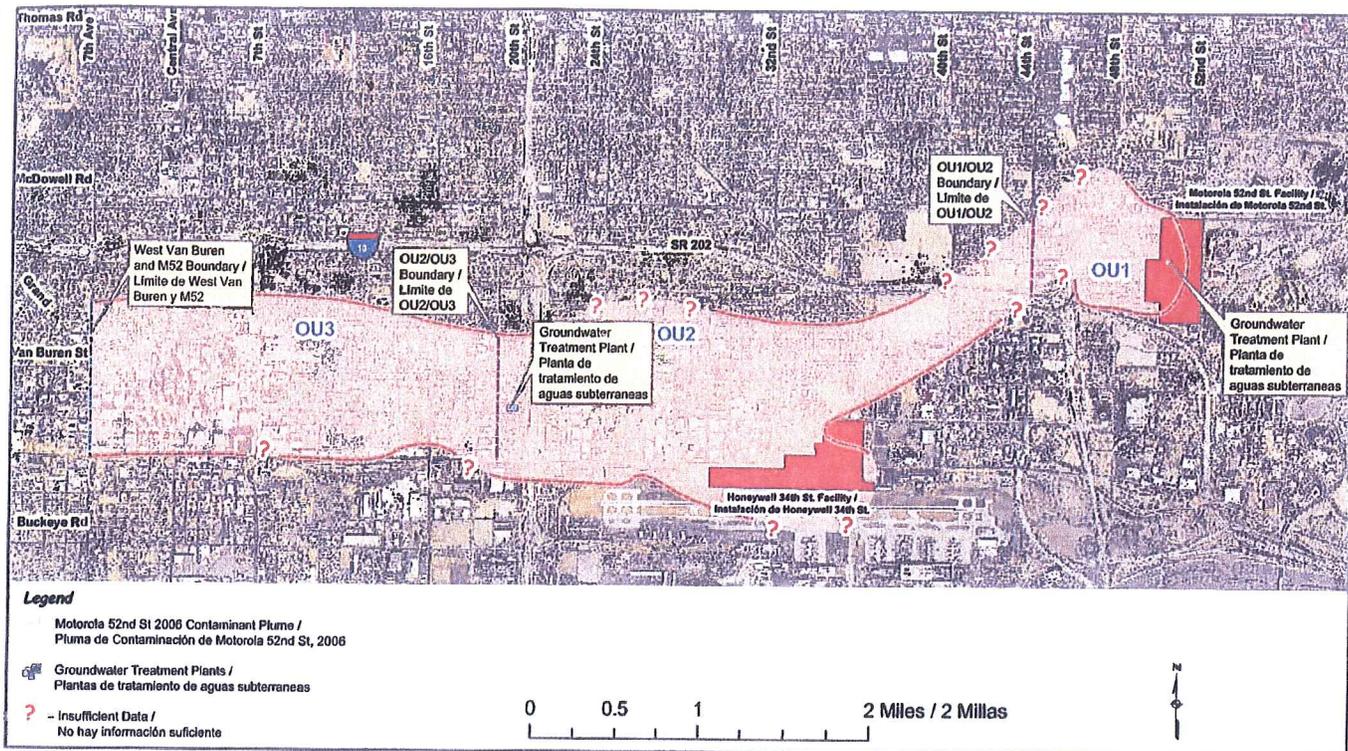
Data from this field work will be compiled into a Remedial Investigation Report. Honeywell and APS will also prepare an OU3 Baseline Human Health Risk Assessment and a Feasibility Study. The Feasibility Study will evaluate a range of cleanup alternatives for the contamination discussed in the Remedial Investigation.

Once EPA, with support from ADEQ, has approved the Remedial Investigation and Feasibility Study, EPA will write a Proposed Plan outlining EPA and ADEQ's preferred cleanup option. After a Public Hearing and public comment period, EPA will respond to comments and write a Record of Decision selecting the clean up option.

### Next Steps

Honeywell and APS will submit a Work Plan outlining how they will perform the work required under the Statement of Work attached to the AOC. Once EPA and ADEQ approve the Work Plan, the groundwater and soil vapor monitoring wells will be installed. EPA will notify businesses and residents in the neighborhoods that will be affected by the field work in advance of scheduled activities. We anticipate field work will begin in late winter, 2010.

We will keep the community informed throughout the Remedial Investigation and Feasibility Study process through community meetings, flyers and fact sheets.



**Figure 1: Motorola 52nd St. Superfund Site / Figura 1: Sitio Superfund Motorola 52nd St.**



**Figure 1: Well Location Map with Proposed New Well Locations / Figura 1: Mapa de la Ubicación de Pozos con Ubicaciones Propuestas para Pozos Nuevos**



# ATTACHMENT 3

# SITE UPDATE

## West Central Phoenix Water Quality Assurance Revolving Fund Site February 2007

*This fact sheet is a publication of the Arizona Department of Environmental Quality (ADEQ) to inform community members near the West Central Phoenix (WCP) Water Quality Assurance Revolving Fund (WQARF) sites of current site activities.*

### BACKGROUND

ADEQ has been conducting an investigation in the WCP Area to learn more about soil and groundwater contamination\* in the Area since 1987, when the WCP Area was made a state Superfund Site under WQARF. In the summer of 1998, the WCP Area was split into the five sites listed on the map (see page 5). Remediation (clean up) and investigation work at the site is funded and managed by WQARF.

Contamination in the area was first detected in the groundwater in July 1982. The City of Phoenix found the chlorinated cleaning solvent trichloroethylene (TCE) in four city water supply wells in the WCP Area. The two wells with the highest concentrations of TCE were shut down in 1982. Monitoring continued on the other two wells to make sure that they met safe drinking water standards. The City of Phoenix closed the last two wells in 1989, when the concentrations became unsafe.

After the initial discovery, extensive groundwater sampling in the WCP Area was conducted by the Arizona Department of Health Services (ADHS), the City of Phoenix, and Salt River Project. The sampling verified the presence of chlorinated solvents in city wells and irrigation wells in the WCP Area.

In 1984, a survey was taken of more than 400 area businesses that might have stored, handled, or disposed of hazardous substances. Based on that investigation, it was determined that contamination came from several sources.

The primary contaminants known to be present at levels above regulatory limits at the WCP Area include the solvents TCE and tetrachloroethylene (PCE), which are present in the groundwater and in some soils.

### UPDATE ON THE WCP WEST OSBORN COMPLEX SITE

The West Osborn Complex (WOC) facility was originally one large property (about 15 acres) located near 35th Avenue and Osborn Road. From the late 1950s to the mid

1970s, companies at the property manufactured electronic components. These businesses used TCE and other chemicals in the production and cleaning process.

Through discussions with former employees, ADEQ learned that large quantities of TCE and other wastes were disposed of in septic tanks and seepage pits at the WOC property from the late 1950s until the late 1960s. TCE was also dumped onto the ground.



A closer look at a seepage pit.

Field investigation activities for the WCP WOC Site have been conducted between 1989 and the present time. The investigation indicates that the source of soil and groundwater contamination in the WCP WOC Site is the WOC property.

In May 1996, ADEQ entered into a Consent Decree (legal settlement) with United Industrial Corporation (United), a firm formerly operating at the property. United agreed to conduct a Remedial Investigation/Feasibility Study (RI/FS), reimburse past costs and pay oversight costs.

United operated a soil vapor extraction (SVE) system from August 1999 through October 2002 to remediate the



SVE system at WOC facility.

\*Italicized terms are defined in the glossary located at the end of this fact sheet.

contamination beneath the WOC property. United completed the soil cleanup at the property and permanently shut down the SVE system in March 2004.

In August 2004, ADEQ issued the draft RI report prepared by United for the WCP WOC Site for public comment to meet the requirements established under Arizona Revised Statutes (A.R.S.) §49-287.03 and Arizona Administrative Code (A.A.C.) R18-16-406. No comments were received during the 30-day comment period.

In April 2005, ADEQ issued the Proposed Remedial Objectives (RO) report for the WCP WOC Site for public comment to meet the requirements established under A.A.C. R18-16-406. Comments were received from the public and ADEQ issued the final RO report in May 2005. In addition, since no comments were received on the draft RI report, this report has been accepted as the final RI report for the Site.

United is currently conducting the FS to evaluate specific remedial measures and strategies required to meet the remedial objectives so that the groundwater can be remediated. In June 2006, as part of the FS, United installed additional monitoring wells to further define the extent of shallow groundwater contamination emanating from the WOC property.

#### UPDATE ON THE WCP NORTH PLUME SITE

Four facilities have been identified as likely sources of the groundwater contamination in the WCP North Plume Site. The four facilities are as follows: the F&B Mfg. Co. (F&B) facility, former Pyramid Industries, Inc. (Pyramid) facility, former Rinchem facility, and Hill Brothers facility. Field investigation activities at the four facilities in the WCP North Plume site have been conducted since 1984.

The F&B facility is located near 39th Avenue and Montecito Avenue. Since 1967, F&B has been manufacturing metal aircraft and spacecraft parts and performing sheet metal forming, and assembly. Solvents are used as degreasing agents to clean the surface of the metals. PCE was used as the degreasing solvent until approximately October 1987, when it switched to 1,1,1-trichloroethane (TCA). In April 1991, ADEQ discovered information that PCE had leaked from F&B's degreaser into the soil under the building.

The former Pyramid Industries, Inc. facility is also located at near 39th Avenue and Montecito Avenue, across from the F&B facility. Pyramid operated a telephone and television cable riser boxes manufacturing facility from 1977 to 1994. Operations at the facility required the use of acids, caustics, heavy metals, paints, and methylene chloride. Several suspected sources of contamination have been identified on the Pyramid facility, including the loading dock/dry well, paint room, and historic hook cleaner.

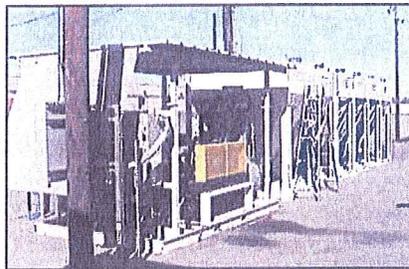
The former Rinchem facility is located near 41st Avenue and Turney Avenue. Rinchem operated a chemical warehouse and distribution facility that handled solvents, oils, and

fuels. Rinchem was the only company that operated at the facility from facility construction in 1982 through June 1993. Several suspected sources have been identified on the Rinchem facility, including the former repackaging area and former tank farm.

The Hill Brothers facility is located near 42nd Avenue and Turney Avenue. The Hill Brothers facility has operated as a chemical distribution facility at this location since 1969. Chemicals that include acids, bases, solvents, chlorine, and concrete additives were stored in above ground storage tanks on-site prior to transfer into containers for distribution.

Field investigation activities for the WCP North Plume site have been conducted between 1984 and the present time. Several contaminants have been detected in soil and groundwater samples collected during field investigations at the four facilities. The primary contaminants of concern are PCE, TCE, and 1,1-dichloroethene (1,1-DCE).

In late 1992, ADEQ entered into a Consent Decree with F&B to conduct an RI/FS, remediate PCE-contaminated soil on-site, reimburse past costs and pay oversight costs. From 1995 until 1998, F&B was financially unable to fulfill the requirement under the Consent Decree. Between 1998 and 1999, ADEQ and F&B Mfg. Co. negotiated a new Consent Decree, which was approved by the Court in August 1999. Under the new Consent Decree, ADEQ will be completing the RI/FS and will conduct the remediation of the facility.



SVE system at F&B facility.

ADEQ has been operating an SVE system at the F&B facility since August 2001 to remediate the PCE contamination beneath the vapor degreaser.

In addition, ADEQ removed approximately 210 cubic yards of soil beneath the vapor degreaser during two excavations in July 2000 and September 2001. As of April 2006, 40,857 pounds of PCE have been removed from the source area by the SVE system.

In August 2006, ADEQ issued the draft RI report for the WCP North Plume Site for public comment to meet the requirements established under A.R.S. §49-287.03 and A.A.C. R18-16-406.

#### UPDATE ON THE WCP NORTH CANAL PLUME SITE

Several facilities have been identified as likely sources of the groundwater contamination in the WCP North Canal Plume Site. The facilities include, but not limited to: the former Osborn Products facility, former Magic Metals facility, former Southwest Metals facility, and Precise Metal

Products/Paraflex Tool & Machine (Precise/Paraflex). Other facilities are currently being investigated as potential sources of groundwater contamination at the Site. Field investigation activities at the WCP North Plume site have been conducted since 1984.

The former Osborn Products facility is located near 36th Avenue and Clarendon Avenue. Osborn Products operated at the site from 1956 to 1984. Facility operations included chrome plating, machining, and grinding of parts for the aerospace industry. Onsite processes included degreasing metal parts, chrome plating, and machining of parts to specification.

The former Magic Metals facility is located near 36th Avenue and Whitton Avenue. Magic Metals operated at the site from 1977 to 1987, when the facility was abandoned by the company. Principal business activities of Magic Metals included electroplating for automobiles, custom restorations, industrial parts, and antiques. The facility generated waste electroplating baths and rinses containing cyanide, waste caustics and unspecified waste solvents from stripping tanks, and waste acids (sulfuric and chromic). Those tanks were excavated and removed from the facility in 1989.

The former Southwest Metals facility is also located near 36th Avenue and Clarendon Avenue, across from the former Osborn Products facility. Southwest Metals operated at this property from 1952 to 1973. The manufacturing process at the site consisted of constructing sand casts to form magnesium, aluminum, and brass castings.

The Precise/Paraflex facility is located near 39th Avenue and Clarendon Avenue. Precise/Paraflex and three subsidiary companies, Precision Marking, Paint Spray, Inc., and Perigee Metal Spinning, have operated at this property since 1963.

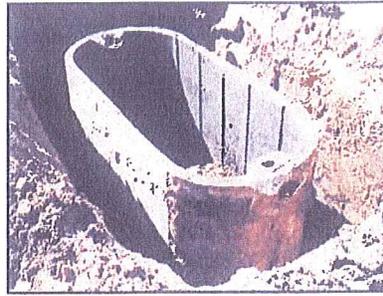
Field investigation activities for the WCP North Canal Plume site have been conducted between 1984 and the present time. Several contaminants have been detected in soil and groundwater samples collected during field investigations at the four facilities. The primary contaminants of concern are PCE, TCE, I-DCE and chromium.

ADEQ continues the RI investigative activities by installing groundwater monitoring wells, as well as collecting soil and soil-gas samples. ADEQ also continues with the investigation of several facilities in the area to determine if they are also sources of the groundwater contamination.

ADEQ plans to complete the field investigative activities by June 2007. The draft RI report is expected to be issued for public comment by December 2007. In addition, ADEQ will be installing an SVE system at the former Osborn Products facility to cleanup the soils beneath the property.

## UPDATE ON THE WCP WEST GRAND AVENUE SITE

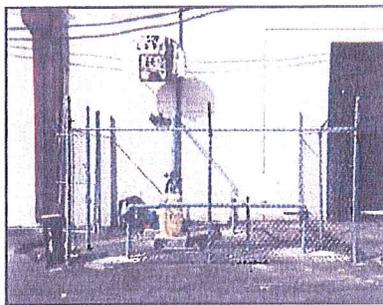
Field investigation activities at the WCP West Grand Avenue Site were conducted between 1989 and 2002. The investigation indicated that the source of soil and ground-



UST at Layke facility.

the manufacturing of various metal parts. TCE was the primary solvent used for parts cleaning/degreasing and a vapor degreaser had been used at the facility from 1969 to approximately 1989. Used chemicals were stored in 55-gallon drums in the waste storage area or in an underground storage tank (UST) prior to disposal. At various times, it appears that the UST overflowed, causing the waste inside the tank to leak out. The UST was removed in October 1990.

Layke operated a SVE system from March 1995 through June 1998 to remediate the contamination beneath the UST.



SVE system at Layke facility.

water contamination at the Site is the Layke Incorporated (Layke) facility.

The Layke facility is located near 33rd Avenue and Osborn Road. Layke began operations at the facility in 1967. The operations included

the manufacturing of various metal parts. TCE was the primary solvent used for parts cleaning/degreasing and a vapor degreaser had been used at the facility from 1969 to approximately 1989. Used chemicals were stored in 55-gallon drums in the waste storage area or in an underground storage tank (UST) prior to disposal. At various times, it appears that the UST overflowed, causing the waste inside the tank to leak out. The UST was removed in October 1990.

Layke operated a SVE system from March 1995 through June 1998 to remediate the contamination beneath the UST.

Between 2001 and 2002, soil samples were collected by ADEQ in the area of the UST to determine the effectiveness of the SVE system in cleaning up the soils. The soil data indicated that the contamination had been effectively

remediated by the SVE system. Based on this information, ADEQ granted a No Further Action (NFA) request in December 2002, pursuant to A.R.S. §49-287.01.

In February 2004, ADEQ issued the draft RI report for the WCP West Grand Avenue Site for public comment to meet the requirements established under A.R.S. §49-287.03 and A.A.C. R18-16-406. No comments were received during the 30-day comment period. Since no comments were received on the draft RI report, this report will be accepted as the final RI report for the Site.

In October 2005, ADEQ issued the Proposed RO report for the WCP West Grand Avenue Site for public comment to meet the requirements established under A.A.C. R18-16-406. No comments were received during the 30-day comment period. ADEQ has yet to issue the final RO report.

## UPDATE ON THE WCP EAST GRAND AVENUE SITE

The former Van Waters & Rogers (VW&R) facility is the primary source of contamination at the WCP East Grand Avenue Site.

VW&R operated near 27th Avenue and Osborn Road from 1957 to 1970. Operations included warehousing and distribution of industrial and agricultural chemical products, upholstery supplies, and laundry and dry cleaning supplies.

The RI field investigative activities at this site were conducted between 1993 and 2002. In January 2002, ADEQ entered into an agreement with Univar (parent company of VW&R) to conduct the monitoring groundwater quality and to conduct the FS.



*SVE system at VW&R facility.*

Since March 2003, groundwater monitoring has been conducted by Univar. Also in 2003, Univar installed an SVE system at the former W&R facility to clean up the soils. The SVE system became operational in January 2004.

In May 2004, ADEQ issued the draft RI report for the WCP East Grand Avenue Site for public comment to meet the requirements established under A.R.S. §49-287.03 and A.A.C. R18-16-406. Comments were received during the 30-day comment period.

In January 2006, ADEQ issued the Proposed RO report for the WCP East Grand Avenue Site for public comment to meet the requirements established under A.A.C. R18-16-406. Comments were received from the public and ADEQ issued the final RO report in June 2006. In addition, since comments were received on the draft RI report, a responsiveness summary was prepared and the final RI report for the Site was also issued in July 2006.

Univar will be conducting the FS to evaluate specific remedial measures and strategies required to meet the remedial objectives.

### **WHAT ARE THE RISKS ASSOCIATED WITH THIS CONTAMINATION?**

To date, testing in the WCP Area indicates no public exposure to the contamination. Sampling shows that the contaminated soils are under asphalt parking lots or asphalt-surfaced storage areas, or under the concrete floors of buildings. Contaminated drinking water wells in the area have been shut down. In addition, notices have been sent out to all known residences within the WCP Area for the testing of domestic wells for contamination.

### **WHAT IS A LOCAL COMMUNITY ADVISORY BOARD (CAB)?**

A very important means for ADEQ to communicate with the public at the West Central Phoenix Sites is through the Community Advisory Board (CAB). A CAB has been formed for the site and meets on a regular basis. The primary purpose of the CAB is to advise ADEQ and the public of issues and concerns related to the remediation of the Site. These meetings are open to the public. The CAB meeting agendas and minutes can be viewed at: <http://www.azdeq.gov/environ/waste/sps/reg.html>

The responsibilities of the CAB include:

- Participating in community outreach
- Assisting in distributing information from ADEQ to the community
- Ensuring that ADEQ understands the opinions and concerns of the residents
- Providing comments to ADEQ on various remediation techniques and other site-related issues

If you would like to apply to become a member of the Community Advisory Board or be notified of the CAB meetings, which are open to the public, please contact:

Linda Mariner,  
Community Involvement Coordinator  
(602) 771-4294  
E-mail: [mariner.linda@azdeq.gov](mailto:mariner.linda@azdeq.gov)

### **WHAT IS THE WATER QUALITY ASSURANCE REVOLVING FUND (WQARF)?**

WQARF is a program established by the Arizona State Legislature to:

- 1) conduct statewide surface and groundwater monitoring;
- 2) study health effects;
- 3) perform emergency remedial actions; and
- 4) conduct long-term remedial action programs.

The WQARF program is funded with state monies, civil and criminal penalties, and funds recovered from parties responsible for contamination.

### **INFORMATION REPOSITORIES**

Interested parties can review site information at the Information Repository at the Burton Barr Central Library (Arizona Room, under Government Documents) located at 1221 North Central Avenue in Phoenix (602) 262-4636.

Also, with 24 hours notice an appointment to review relating documentation is available Monday through Friday from 8:30 a.m. to 4:30 p.m., at the ADEQ Records Management Center, 1110 W. Washington Street in Phoenix. Please contact (602) 771-4380, (800) 234-5677 or TDD line (602) 771-4829 to schedule an appointment to review these documents.

## ADEQ CONTACTS

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## GLOSSARY

**Contamination** - Any hazardous substance released into the environment.

**Feasibility Study (FS)** - An in-depth study designed to evaluate the remedial alternatives that may be implemented to clean up the site.

**Groundwater** - Water found beneath the earth's surface that fills pores between materials such as sand, clay, or gravel. In aquifers, groundwater occurs in sufficient quantities that can be used for drinking water, irrigation and other purposes.

**Hazardous Substance** - Any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment.

**Remediation** - Actions taken to treat the release or threat of release of a hazardous substance that could affect people or the environment. The term "cleanup" is sometimes used interchangeably with the terms remedial action, removal actions, response actions, remedy, remediation, or corrective action.

**Remedial Investigation (RI)** - An in-depth study designed to gather the data necessary to determine the nature and extent of contamination at a site.

**Remedial Objectives (RO)** - Established for the current and reasonably foreseeable uses of land and waters of the state that have been or are threatened to be affected by a release of a hazardous substance.

**Soil Vapor Extraction (SVE)** - A commonly used technique to clean up contaminated soils. SVE draws air through contaminated soils and the contaminants are transferred to the air. The contaminated air is then treated or discharged, depending on the amount and type of contamination present.

**Solvent** - Chemical products, usually liquid, that are used to dissolve other substances.

# West Central Phoenix Superfund Sites

