

ADEQ Memorandum

Arizona Department
of Environmental Quality

Date: December 13, 2019
To: Laura Malone, Director Waste Programs Division
Thru: Tina LePage, Manager Remedial Projects Section
From: Kyle Johnson, PE

Subject: Reopening of East Central Phoenix - 38th Street and Indian School Road Water Quality Assurance Revolving Fund (WQARF) Site

The purpose of this document is to summarize the rationale for the reopening of the East Central Phoenix - 38th Street and Indian School Road Water Quality Assurance Revolving Fund (WQARF) Site (the Site) pursuant to Arizona Revised Statute (A.R.S) §49-287.01(M)(1).

The Site was listed on the WQARF Registry in 1998 after soil and groundwater investigations confirmed that tetrachloroethene (PCE) was present in groundwater at concentrations above the Arizona Aquifer Water Quality Standard (AWQS) of 5 micrograms per liter (µg/L). A remedial investigation (RI) was performed to characterize the nature and extent of the PCE groundwater plume¹. A decision to conduct in-situ chemical oxidation (ISCO) for groundwater remediation was made to address levels of PCE that remained above the AWQS at the Site. Three ISCO injection events were performed in select wells in 2017 and 2018. Following the ISCO injections, the results of three consecutive groundwater monitoring events demonstrated that concentrations of PCE were below the AWQS. Based on the results of these groundwater monitoring events, the Site was delisted from the WQARF Registry in June 2018.

To address stakeholder concerns, additional groundwater monitoring was performed in February 2019 at the Site, after it was delisted. Sampling results indicated that concentrations of PCE were again above the AWQS in select wells at the Site.

A.R.S § 49-287.01(M)(1) states:

M. A site that has been removed from the registry may be reopened and remedial action taken or required for any of the following reasons:

1. On discovery of new information that, based on the rules adopted by the department pursuant to section 29-282.06, would result in the potential denial of a no further action request.

The discovery of PCE concentrations in exceedance of the applicable AWQS after the site was delisted meet the criteria set forth in A.R.S § 49-287.01(M)(1). Therefore, as of the date of this memorandum, ADEQ has reopened the Site pursuant to A.R.S § 49-287.01(M)(1).

¹ Hargis + Associates, 2015. Remedial Investigation Report, East Central Phoenix 38th Street and Indian School Road Water Quality Assurance Revolving Fund Site Phoenix, Arizona. April 30, 2015.