



November 20, 2018

Ms. Nichole Osuch
Voluntary Remediation Project Manager
Waste Programs Division
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, AZ 85007

Subject: Arizona Public Service Company – Grant Street Yard
Former Manufactured Gas Plant Site, Phoenix, Arizona,
Submission of No Further Action Report
Request for No Further Action Determination
VRP Site # 504477-00

Dear Ms. Osuch:

Arizona Public Service (APS) is requesting a determination of No Further Action (NFA) regarding the Former APS Grant Street Yard Manufactured Gas Plant (MGP) Site (Site) [Site Code # 504477-00]. This report has been prepared to provide the Arizona Department of Environmental Quality (ADEQ) the information required by Arizona Revised Statutes (A.R.S.) §49-181(A), as detailed in the seven items listed below. In addition, this report includes a scaled site map, which shows the NFA boundary area and a list of the specific contaminants for which the NFA is being issued.

The remedial activities were performed in accordance with Arizona Revised Statutes (A.R.S.) §49-282.06 and other applicable state and local requirements. Following completion of the remedial action, confirmation soil sampling indicates that the cleanup goals outlined in the RAP have been achieved at this Site

A remedial excavation, demolition, and restoration action was completed for the Site in 2017. A total of 61,472 tons of material, which included 60,332 tons of special waste soil, 1,112 tons of construction debris (uncontaminated asphalt and concrete), 24 tons of tree debris, 3.98 tons of scrap metals (i.e., abandoned pipe), and 0.63 ton of asbestos containing material (ACM) were removed from the Site and along Grant Street during the remedial action. Wastes generated were transported offsite for disposal at approved facilities.

The soil confirmation sampling performed following soil excavation activities at the Site indicates that the Site cleanup goals (residential soil remediation levels (SRLs) and groundwater protection levels, (GPLs)) outlined in the RAP have been achieved for soils at the Site and along Grant Street where piping was removed. Statistical analysis of the confirmation samples for each decision unit (DU) at the Site indicated that the 95% upper confidence limit (UCL) had been met for all DUs for polycyclic aromatic hydrocarbons (PAHs) and in DU-4 for PAHs and volatile organic compounds (VOCs). Additionally, all samples from the excavation trench along Grant Street where piping was removed were below the Site cleanup criteria (residential SRLs).

The NFA Request Report provides the specific documentation supporting a NFA determination as required by A.R.S. §49-181 (A), in the seven items listed below:

- **Specific Contaminants for which an NFA Determination Is Being Sought** – APS is seeking an NFA for PAHs and VOCs associated with the MGP activities that occurred at the Site. Table of specific compounds is provided below and in Section 7 of the attached report:
 - PAHs
 - Benzo(a)anthracene
 - Benzo(a)pyrene
 - Benzo(b)fluoranthene
 - Benzo(k)fluoranthene
 - Dibenz(a,h)anthracene
 - Indeno(1,2,3-cd)pyrene
 - Chrysene
 - Flouranthene
 - Pyrene
 - Naphthalene
 - VOCs
 - 1,2,4-trimethylbenzene
 - Benzene
 - Toluene
 - Ethylbenzene
 - Total Xylenes

APS is seeking an NFA determination for the COCs listed above in both soil and groundwater.

- **Description of the Actions Taken to Achieve Remediation Levels or Controls Determined in Accordance with A.R.S. §49-175(B)** – APS has completed remedial excavation, demolition, and restoration activities as described in the ADEQ-approved RAP and per additional ADEQ approvals during the remedial activities. The remedial activities included excavation and disposal of impacted soil, soil confirmation testing of remaining soil, backfilling, and restoration of the Site, including installation of gravel cover at the Site.
- **Description of Any Treatment Systems** – No treatment systems are located at the Site.
- **Description of Any Institutional Controls and How They Will Be Maintained** – Because site cleanup criteria (residential SRLs) were met at the Site and along Grant Street, no institutional controls are required.
- **If post-remediation monitoring is proposed a description of the type of monitoring, monitoring locations, contaminants to be monitored, monitoring frequency and sampling procedures** -- No post-remediation monitoring is proposed.

- **Description of Community Involvement that Meets A.R.S. §49-176** – APS' community involvement program for this project included public notice, public access to the RAP, public meetings, and comment periods; project newsletters in English and Spanish; and several meetings with City officials. In addition, once the NFA Request is approved, APS will provide a general public notice of the request for an NFA determination for soil. A 30-day public comment period accompanies the general public notice. The public notice will be published in a local newspaper, once in the Sunday edition. A draft public notice is provided in Appendix A in the attached report.
- **List of All Permits Obtained for the Remedial Action** – A list of all the permits obtained for this project is provided in Section 7 of the attached report.

APS appreciates your assistance in obtaining a NFA determination for the site. If ADEQ requires additional information in connection with its review and approval of the enclosed report please contact me at (602) 250-3850. One hard copy including an electronic disk is enclosed. In addition, an electronic PDF copy of this submittal was transferred via email.

Sincerely,



Judy Heywood
Remediation Project Manager

Enclosure

c.c. Dave Allard, Jacobs