March 20, 2020

Ms. Caitlin Burwell
Arizona Department of Environmental Quality,
Voluntary Remediation Program,
1110 West Washington Street
Phoenix, AZ 85007

Subject: **Request for No Further Action Determination**
Camelback and Miller Shopping Center
4432 North Miller Road
Scottsdale, Arizona 85251
AEI Project No. 401581
VRP Site Code #513272-00

Dear Ms. Burwell:

On behalf of Camel Investment, LLC (Camel), AEI Consultants (AEI) is requesting that the Arizona Department of Environmental Quality (ADEQ) issue a No Further Action (NFA) determination for soil underlying a portion of the Camelback and Miller Shopping Center ("the Site"). The Site is located at 4432 North Miller Road, Building H, in Scottsdale, Arizona. The Maricopa County Assessor Parcel Number that includes the Site is (APN) 173-40-006C. The Site location and vicinity are shown on Figure 1. Figure 2 presents the Site plan.

This request is made pursuant to Arizona Revised Statutes (ARS) § 49-181(A) to acquire an NFA determination from the ADEQ. The NFA determination is to address an approximate 9,640 square-foot portion of the Site, designated as Building H within the Camelback and Miller Shopping Center (Figure 2), where analytical data have indicated that soil may have been impacted by tetrachloroethene (PCE) and trichloroethene (TCE) from the former dry cleaning operations.

SITE DESCRIPTION

The Site totals 0.447 acres in area and is located southwest of the southwest corner of the intersection of North Miller Road and East Camelback Road in Scottsdale, Arizona. The Site consists of Building H, which totals approximately 7,500 square feet, within the Camelback and Miller Shopping Center. The Pony Express Cleaners suite consists of Suites 103-105 in Building H. The Site Location Map is presented as Figure 1.

Review of the Geologic Map of Arizona, published by the Arizona Geological Survey and dated 1978, indicates that the Site is located in the Phoenix Basin within the Basin and Range physiographic province of Southern and Western Arizona. The Basin and Range province is characterized by elongated mountain ranges trending northwest-southeast and separated by broad alluvial valleys. The Phoenix Basin contains unconsolidated floodplain alluvium of various

sizes with a maximum depth of approximately 10,000 feet. Alluvium in the Phoenix Basin is highly variable and ranges from dense sand, gravel, and cobbles to silts and clays.

According to the Soil Survey of Maricopa County, Central Part, Arizona, published by the United States Department of Agriculture Soil Conservation Service and updated in 2008, the soils beneath the Site are classified as Laveen loam. The Laveen soil series consists of deep, well drained, loam textured soils with depths of at least 60 inches. Laveen soils have moderately high to high permeability, moderate available water capacity, and a moderately alkaline soil reaction.

Based upon Arizona Department of Water Resources (ADWR) Hydrologic Map Series Number 35, dated 2003, the direction of groundwater flow beneath the Site is inferred to be to the south-southeast. The Site lays within the groundwater contaminant plume boundaries associated with the North Indian Bend Wash Superfund site (NIBW). Based on general depth to groundwater information provided by ADEQ project managers for the NIBW, depth to groundwater in the Site vicinity was estimated to be 120 to 130 feet below ground surface (bgs). During drilling and sampling conducted by AEI at the Site in September 2019, discussed below, groundwater was encountered at a depth of 117 feet below ground surface (bgs) in a silty clay sediment.

PREVIOUS SITE INVESTIGATIONS

Investigations at the former dry cleaners within Building H have been conducted since 2012. Table 1 presents a timeline of Site investigations since 2012. Tables 2a and 2b present a summary of the soil gas sample data. Table 3 presents a summary of the air quality sample data.

In November 2019, AEI submitted the *VRP Site Characterization Report* documenting the additional Site characterization activities completed in September 2019. Based on the data collected from the Site investigations:

- PCE concentrations from the investigations performed in 2019, Limited Phase II Subsurface Investigation, and from borings AB-8, AB-9, and AB-10, indicate that calculated soil concentrations of PCE in excess of the Soil Remediation Levels (SRLs) or Groundwater Protection Level (GPL) were not identified beneath the Site. Elevated concentrations of PCE in soil gas above the attenuated industrial air Regional Screening Levels (RSLs) do not appear vertically extensive and were not detected within 50 feet of the groundwater table. Elevated concentrations of PCE above the attenuated industrial air RSLs was identified in lateral boring AB-9; however, as the concentrations have attenuated an order of magnitude from the source area (AB-4) and were not detected above the attenuated industrial air RSLs beneath Building K (SS-9 through SS-11), further lateral and vertical assessment of PCE in soil gas is not warranted at this time.

- TCE concentrations from the investigations performed in 2019, Limited Phase II Subsurface Investigation, and from borings AB-8, AB-9, and AB-10, indicate that calculated soil concentrations of TCE in excess of the SRLs or GPL were not identified beneath the Site. Elevated concentrations of TCE in soil gas above the attenuated industrial air RSLs do not appear laterally or vertically extensive and were not detected within 50 feet of the groundwater table. Further assessment of TCE in soil gas is not warranted at this time.
- The PCE concentrations observed in indoor air samples collected during the October 2019 event, following the renovation activities in the dry cleaning suite, did not exceed the industrial air RSL of 47 microgram per cubic meter (µg/m^3). Therefore, ceasing of the dry cleaning activities using PCE, removing PCE from the Site, removing the PCE dry cleaning machine, and sealing the floor with Retro-Coat™ has resulted in significantly improving the indoor air quality at the Site. As minor concentrations continue to be detected in indoor air, further evaluation of the continued source of PCE in indoor air quality is warranted.
- TCE was not reported at or above the applicable laboratory RDLs in the air samples collected at the Site. Therefore, ceasing of dry cleaning operations, continues to be effective at reducing TCE concentrations in indoor air in response to the exceedance of the US EPA Urgent Response Action Levels noted in the December 2018 sampling event. Further urgent response action due to elevated TCE is not warranted.

Based on the conclusions presented in the report, AEI recommended that to evaluate whether the SSD systems are necessary to protect indoor air quality, temporarily shutting down the sub-slab depressurization (SSD) systems and collecting soil gas and additional indoor air quality samples to further evaluate the source of PCE observed in indoor air.

In January 2020, AEI performed an Additional Limited Indoor Air Quality and Soil Gas Rebound Sampling at the Site after a 60-day shutdown of the SSD systems at the Site in an effort to evaluate whether chemical concentrations in indoor air are acceptable without the SSD systems operating. The findings of the sampling include:

- PCE was detected in each of the two indoor air samples collected from within the dry cleaning business and analyzed, DC-N and DC-S and in the adjacent tenant suite to the north (A-N). The maximum detected PCE concentration was 7.74 µg/m^3 which did not exceed the industrial air RSL of 47 µg/m^3, which would apply if the source of PCE was from the release in the subsurface. TCE was not reported at or above the applicable laboratory RDLs in the five air samples collected at the Site. Therefore, ceasing of the dry cleaning activities using PCE, removing PCE/TCE from the Site, removal of the former dry cleaning machine, and sealing the floor with RetroCoat continued to result in significantly improved indoor air quality at the Site.
- PCE and TCE were not detected the eleven sub-slab soil gas samples at concentrations exceeding their applicable attenuated RSLs and had generally decreased at least one magnitude since the January 2019 sampling event. Based on the January 2020 results, residual concentrations of PCE and TCE beneath Building H were not detected at concentrations that posed an unacceptable risk to indoor air quality.

To date, soil samples collected from the Site have not yielded concentrations of PCE or associated breakdown products at or above the laboratory detection limits. Soil gas samples collected from 2018 through January 2020 have indicated the presence of PCE and TCE beneath the Site at maximum concentrations of 11,500 µg/m^3 and 234 µg/m^3, respectively. Based on the PCE concentrations detected across the Site, a residual mass of PCE is likely present in the shallow soil gas beneath the Site; however, the residual mass does not appear to be comprised of PCE or TCE concentrations in soil above the applicable ADEQ SRLs and GPLs. Conversion of soil gas concentrations utilizing the three-phase partition method for calculating soil concentrations yielded a maximum PCE concentration in soil of 0.006990 mg/kg and maximum TCE concentration of 0.000220 mg/kg. Soil gas to soil concentration conversations are presented in Table 4.

Based on the results of these investigations, it was AEI's opinion that that further evaluation of indoor air quality or subsurface soil gas at the Site was not warranted. In addition, continued operation of the SSD systems did not appear to be required to protect indoor air quality from vapor intrusion of residual PCE and TCE beneath the Site.

ADEQ REQUEST FOR CLOSURE

On February 26, 2020, the ADEQ issued a letter to Camel stating that the rationale for requesting the NFA determination was acceptable and to proceed with submitting this NFA application. A description of soil characteristics, per the seven report requirements listed in ARS § 49-181, Paragraph A, is provided below.

1. A Description of the Specific Contaminants of Concern for which a No Further Action Determination is Being Sought:

The NFA determination will address an approximate 9,640 square-foot area of soil designated as Building H, including the current dry cleaning tenant suite, and is shown on Figure 4. The initial soil gas analytical data collected during the 2012 URS investigation indicated that soil in this area may have been impacted by PCE and TCE from the former dry cleaning operations that utilized PCE solvent in the cleaning process. The 2019 investigations indicated VOCs, including PCE and TCE, detected in soil gas when utilizing the three-phase partition method for calculating soil concentrations do not exceed the SRLs and GPLs, when established. Therefore, an NFA for select VOCs is requested and the list of the select VOCs is included in in Table 5.

2. A Description of the Actions Taken to Achieve Remediation Levels or Controls Determined in Accordance with 49-175, Subsection B:

No remedial actions were required to achieve remediation levels or controls regarding soil contamination at the Site; however, it should be noted that three SSD systems had operated from late 2015 until November 2019 in an effort to protect Building H at the Site from vapor intrusion. VOCs, including PCE and TCE, detected in soil gas when utilizing the three-phase partition method for calculating soil concentrations did not exceed the SRLs when established.

The ADEQ SRLs are as shown in Table 4. Thus, ADEQ stated in a letter dated February 26, 2020 that the NFA Request can be submitted.

3. A Description of Any Soil, Water, or Soil and Water Treatment Systems Used as Part of the Remediation:

As stated above, no remediation was required at the Site. Remedial efforts are neither required by nor being overseen by the ADEQ.

4. Whenever Institutional or Engineering Controls are Placed on the Site:

(a) A demonstration that any engineering control or combination of engineering controls has been constructed, is functioning, and will be maintained

(b) A description of the proposed land use for the site and a demonstration that the use will not compromise the integrity of the engineering controls and will be in accordance with any institutional controls

Three SSD systems were operational at the Site from late 2015 until November 2019 within Building H. Based on the Additional Limited Indoor Air Quality and Soil Gas Rebound Sampling completed in January 2020, further operation of these systems is not warranted.

As such, AEI does not propose institutional and/or engineering controls subsequent to this NFA request regarding soil contamination at the Site.

5. If Post-Remediation Monitoring is Proposed, a Description of the Type of Monitoring, Monitoring Locations, Contaminants to be Monitoring, Monitoring Frequency, and Sampling Procedures:

Active remediation was not required to meet soil SRLs and GPLs; therefore, no post-remediation monitoring is needed.

6. A Description of Community Involvement Activities Undertaken to Meet the Requirements of § 49-176:

A public notice stating that NFA was requested for the Site has been drafted and is included as Attachment A. Upon approval from the ADEQ, the public notice will be submitted to the Arizona Republic newspaper and published for a minimum of one day. Upon publishing of the public notice, the 30-day comment period will commence. A draft of the public notice is presented in Appendix A.

7. List of Permits Under this Title Obtained for the Remedial Action or Held by the Applicant Pertaining to the Site:

No remedial action was necessary for site-wide soils; therefore, no permits were obtained.

CONCLUSIONS

Based on the Site data, facts presented in this letter, and previous documents submitted to ADEQ, it is requested that ADEQ issue a NFA determination for soil beneath the approximately 9,640 square feet area of dry cleaning tenant suite and adjacent areas at the Site. It is specifically requested that the NFA letter indicate that no further action (including, without limitation, any investigation, characterization and/or any remediation) is necessary, and that no institutional controls, deed restrictions, or land use covenants are required in regard to the Site.

Please contact Ms. Jacqueline Day at (858) 531-6297 if you have any questions or need additional information.

Sincerely,
AEI Consultants

Registered Geologist
CERTIFICATE NO.
54800
JACQUELINE C. DAY
Date Signed 3-20-2020
ARIZONA, U.S.A.

Jacqueline C. Day, R.G. 54800
Senior Geologist
(858) 531-6297

Brian Brody
Project Manager

Registered Professional Engineer (Civil)
CERTIFICATE NO.
60366
TRENT A. WEISE
DATE SIGNED 3/20/20
ARIZONA, U.S.A.
EXP 9/30/21

Trent Weise, P.E. 60366
Vice President

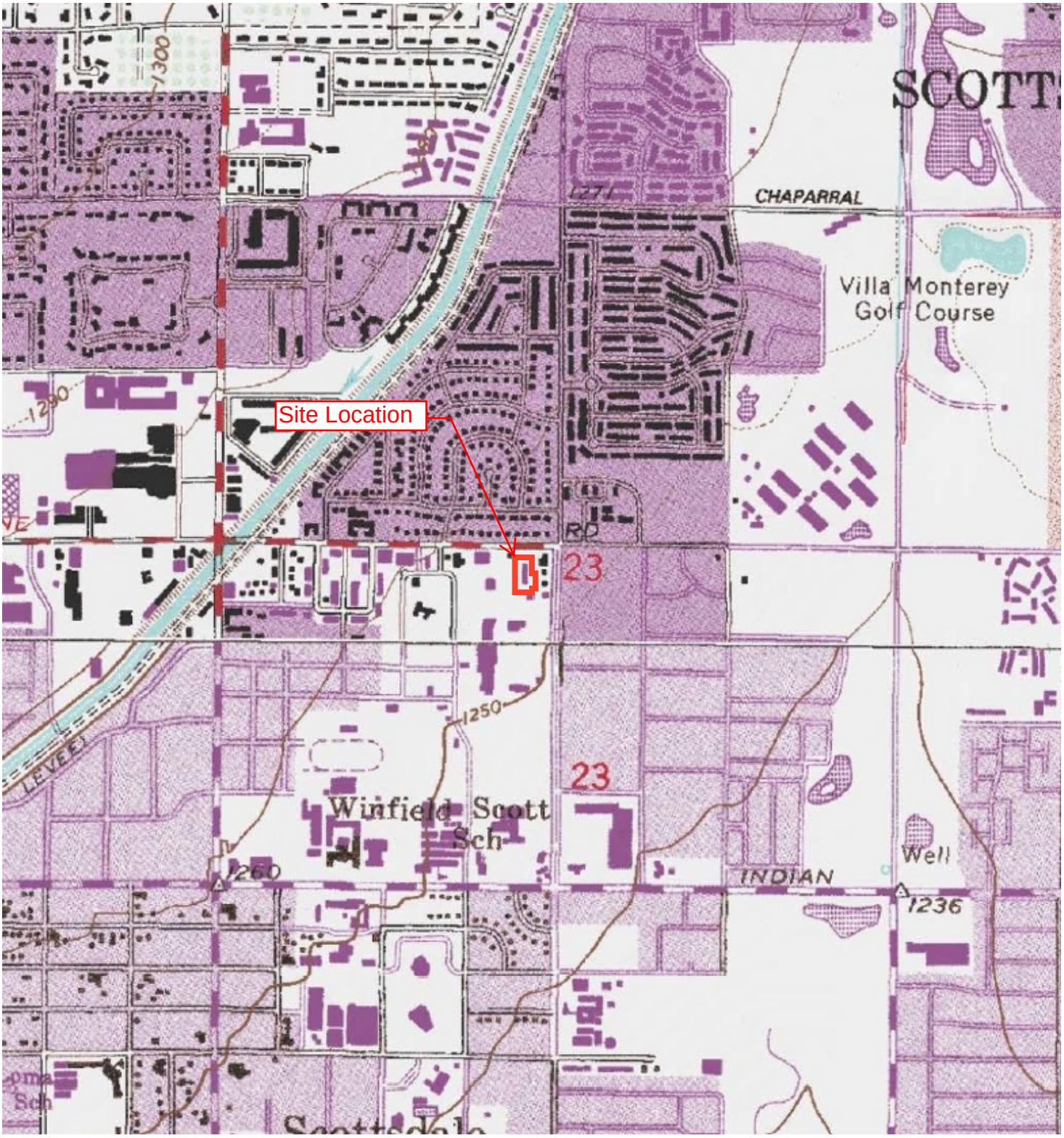
Attachments:

Figure 1 Site Location Map
Figure 2 Site Map
Figure 3 PCE Isoconcentration Map
Figure 4 NFA Boundary Map
Table 1 VRP Timeline
Table 2a Soil Gas Sample Data Summary – Dry Cleaning VOCs
Table 2b Soil Gas Sample Data Summary – Remaining VOCs
Table 3 Indoor Air Sample Date Summary
Table 4 Three-Phase Partitioning Equations Soil Gas to Soil Conversion – All VOCs
Table 5 Compounds for NFA Request

Attachment A: Draft Public Notice

cc: Camel Investment, LLC
Attn: Mr. Rick Touton
4241 N. Winfield Scott Plaza, Suite 201
Scottsdale, Arizona 85251

FIGURES



LEGEND

N

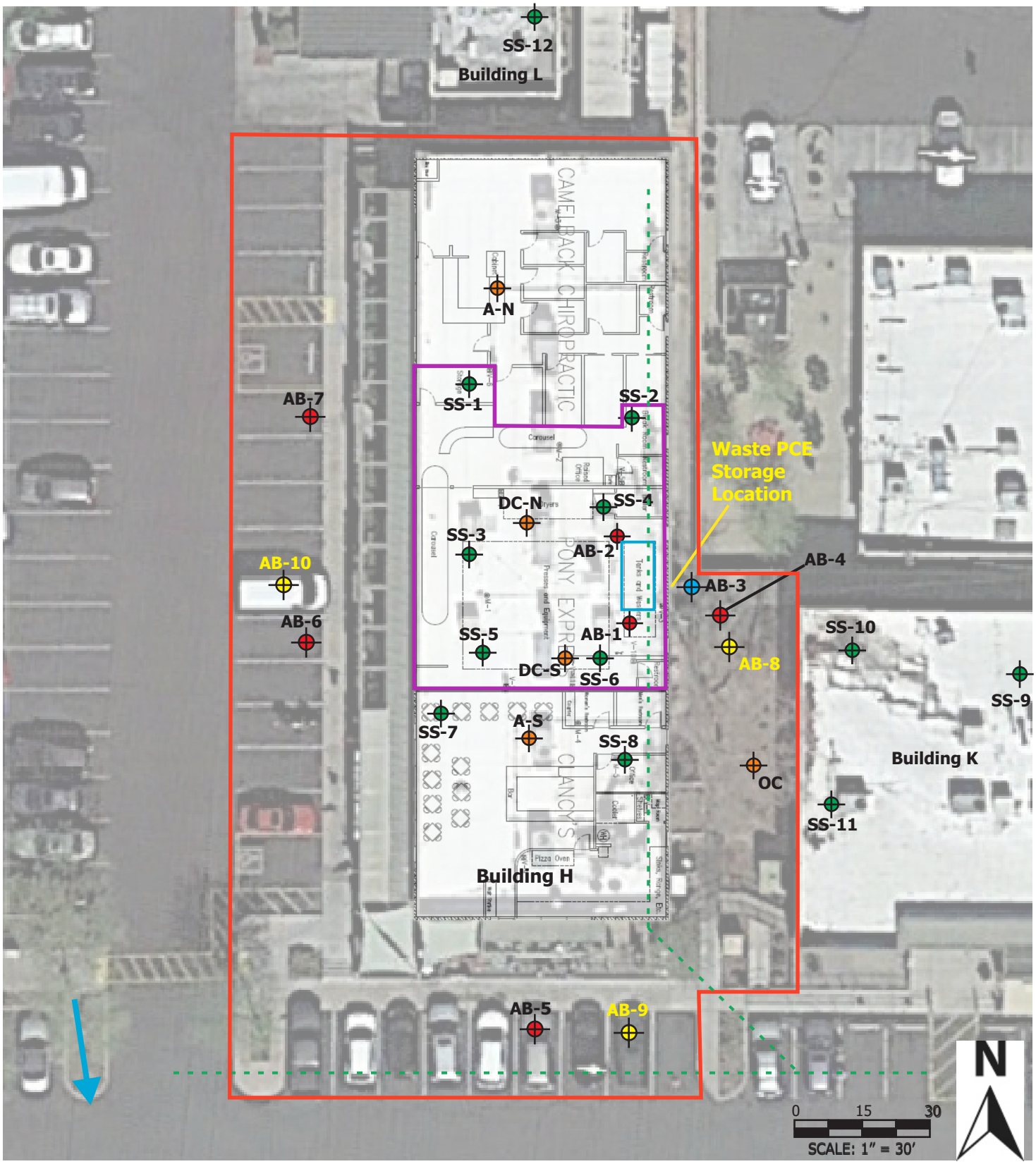
Map: Paradise Valley, Arizona and Tempe, Arizona
Date: 1982
Source: USGS

AEI Consultants
2500 Camino Diablo, Walnut Creek, California

SITE LOCATION MAP

4432 North Miller Road
Scottsdale, Arizona

FIGURE 1
Project No. 401581



LEGEND

- Approximate Property Boundary
- Dry Cleaner Suite Boundary
- Dry Cleaning Machine
- Soil Boring/Soil Gas Probe
- VRP Soil Boring/Soil Gas Probe
- Sub-Slab Soil Gas Sample Point Location
- Soil Boring
- Air Sample Location
- Sewer Line
- Inferred Groundwater Flow Direction

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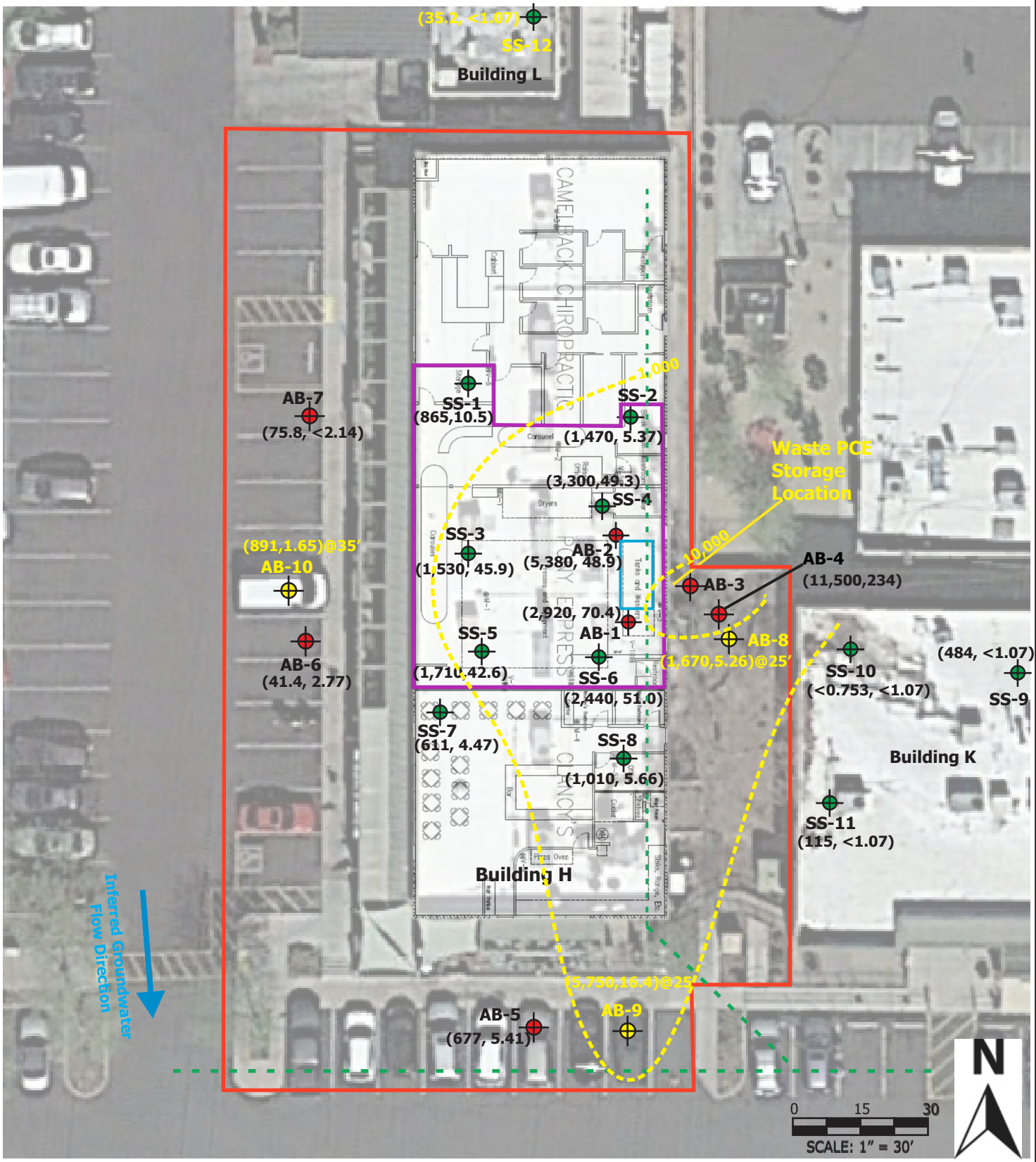
SITE MAP

4432 North Miller Road
Scottsdale, Arizona 85251

FIGURE 2
Project No. 401581



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- Dry Cleaner Suite Boundary
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- Soil Boring/Soil Gas Probe
- VRP Soil Boring/Soil Gas Probe
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- Soil Boring
- Sewer Line

PCE Tetrachloroethene
TCE Trichloroethene
ug/m3 Micrograms per cubic meter

(1,010, 5.66) PCE/TCE Concentration in ug/m3

PCE Isoconcentration in Soil Gas in ug/m3

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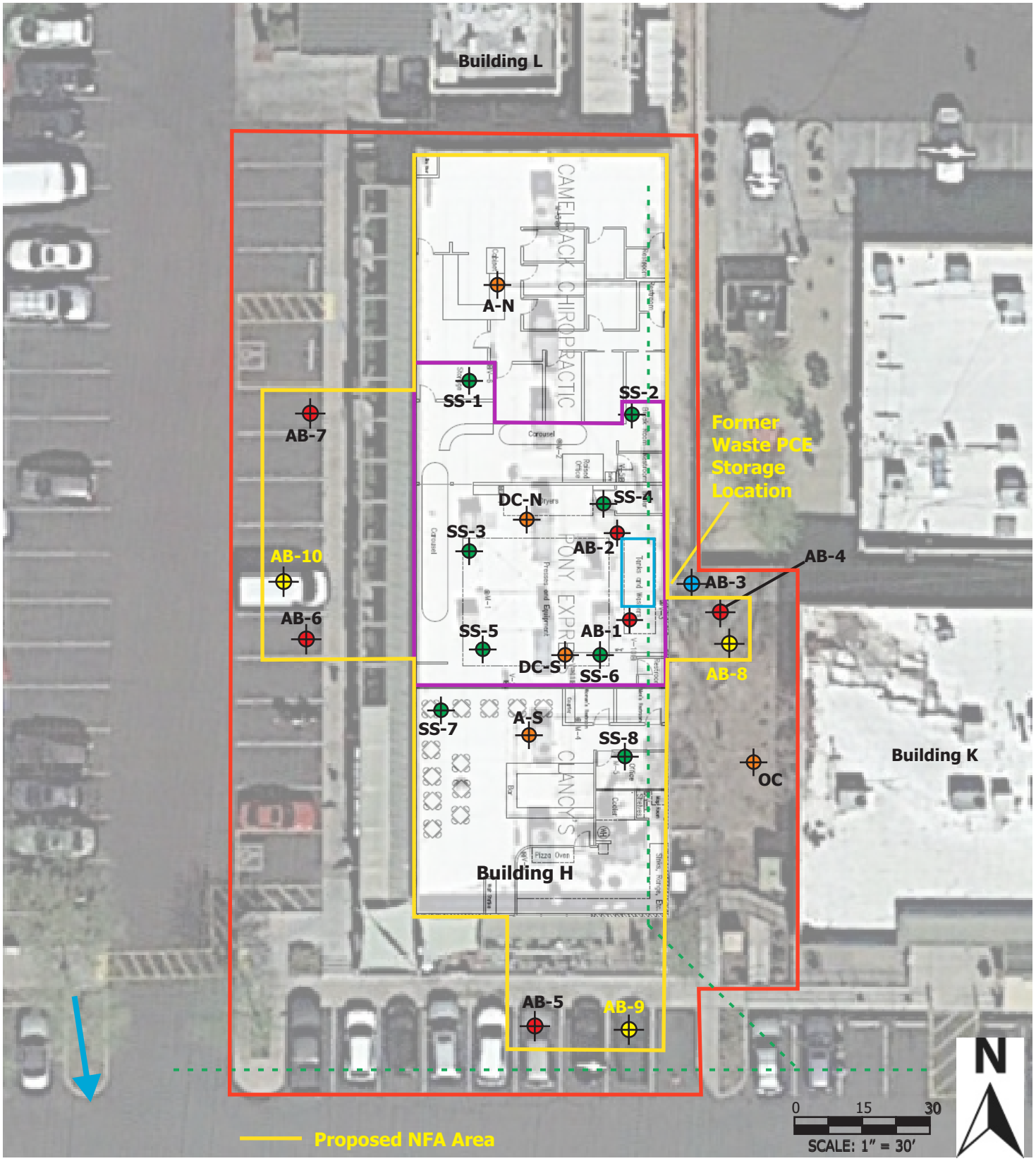
Maximum PCE/TCE Concentrations in Soil Gas

4432 North Miller Road
Scottsdale, Arizona 85251

FIGURE 3
Project No. 401581



LEGEND

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AEI Consultants

2500 Camino Diablo, Walnut Creek, California

SITE MAP - NFA Area

4432 North Miller Road
Scottsdale, Arizona 85251

FIGURE 4
Project No. 401581

TABLES

TABLE 1 - VRP PROJECT TIMELINE

Camelback and Miller Plaza, Building H VRP Site Code: 513272-00

4432 North Miller Road, Scottsdale, Arizona

Date	Activity
1981-2012	A Phase I Environmental Site Assessment (ESA) report, prepared by URS Consulting (URS) in June 2012, identified a dry cleaning facility that had operated at the Site since 1981.
July 2012	In July 2012, URS conducted a Phase II ESA (Phase II) that consisted of the installation of three soil borings for the collection of soil and soil gas samples. VOCs were not identified in the soil samples at concentrations exceeding the laboratory detection limits. PCE was identified in the three soil gas samples at a maximum concentration of 11,800 ppbv.
September 2012	In September 2012, URS installed six permanent soil gas probes for the collection of soil and soil gas samples. VOCs were not identified in the soil samples at concentrations exceeding the laboratory detection limits. PCE was identified in the six soil gas samples at a maximum concentration of 5,940 ppbv.
September 2012	From September 10 to 12, 2012, URS collected indoor air samples within the Pony Express Cleaners suite and in the other three suites located in Building H at that time. PCE was detected in the indoor air samples collected at the Site at concentrations ranging from 39.3 µg/m3 to 739 µg/m3. The maximum PCE concentration detected was in the indoor air sample was collected from the chiropractic tenant suite to the north of the dry cleaner suite.
September 2012	On September 25, 2012, URS conducted an additional round of soil gas sampling from soil gas probes SB4 through SB-9. PCE was identified in the soil gas samples at concentrations ranging from 3,620 ppbv to 8,110 ppbv
Late 2012	Based on the results of the URS investigations in 2012 including the elevated concentrations of PCE in soil gas and indoor air, three SSD systems were installed, one in each of the three tenant suites in Building H at the Site. The SSD systems were designed to minimize the potential for migration of subsurface soil gas to enter the interior of the building. The SSD systems were operated and maintained by the current property owner (Fry/Camel Investment) and was monitored by URS until 2016, when monitoring of the systems was discontinued although operation of the systems continued.
Late 2015	In late 2015, URS conducted an indoor air sampling and PCE concentrations were reported to range from 64 to 185 ppbv, exceeding the US EPA RSL for PCE of 6.93 ppbv. TCE concentrations were reported to range from 0.6 to 2.0 ppbv, exceeding the EPA RSL for TCE of 0.56 ppbv.
12/16/2016	A Phase I ESA was completed by Partner Engineering and Science on December 16, 2016 identified dry cleaning facility that operated a Union Model #L850U200 closed loop system utilizing PCE. Partner determined that the dry cleaning facility has operated at the Site since 1981 and represented a REC for the Site
December 2018-January 2019	In December 2018, AEI completed a Phase II Investigation at the Site and conducted a Limited Indoor Air Quality Assessment at the Site in January 2019. Analytical results for the indoor air samples indicate that PCE and TCE were several magnitudes above the US EPA industrial air screening levels. In addition, TCE concentrations in the northerly adjacent chiropractic tenant suite were shown to be above the US EPA Urgent Response Action Level of 24 µg/m^3, presuming the source was from vapor intrusion from the subsurface and not directly from the adjacent dry cleaning suite. Urgent action from the property owner was recommended to address the concentrations detected in indoor air.
March 2019	In response to the presence of elevated concentrations of PCE and TCE in indoor air, the use of the PCE dry cleaning plant in Building H was discontinued and the PCE and TCE containing chemicals were reportedly removed from the Site by March 8, 2019.
3/1/2019	An indoor air and sub-slab soil gas sampling event was conducted for adjacent Buildings K and L. Soil gas results indicated concentrations of PCE below the attenuated indoor air US EPA RSL in soil gas samples SS-9 through SS-12. Air quality results indicated minor concentrations of PCE were detected in four of six indoor air samples collected and analyzed at the Site at a maximum concentration of PCE of 4.72 µg/m^3 in sample IA-Clancy from Building K, which is below the US EPA RSL of 47 µg/m^3.
3/25/2019	The second indoor air sampling event was conducted. Results indicated concentrations of PCE above the indoor air US EPA RSL in the dry cleaning suite (DC-N and DC-S) and northernly tenant suite (A-N); however, PCE and TCE concentrations in indoor air significantly declined since the dry cleaning plant was shut down. TCE was not detected above the laboratory reporting limits in the five air samples collected.
5/2/2019	AEI conducted a third indoor air sampling event . Results indicated PCE concentrations above the indoor air US EPA RSL in the dry cleaning suite (DC-N and DC-S) and the northerly tenant suite (A-N). TCE was not detected at concentrations exceeding the laboratory method reporting limit in the five samples collected at the Site.
6/21/2019	The Site gained acceptance into the ADEQ VRP.

TABLE 1 - VRP PROJECT TIMELINE

Camelback and Miller Plaza, Building H VRP Site Code: 513272-00

4432 North Miller Road, Scottsdale, Arizona

Date	Activity
6/28/2019	Representatives from AEI, Camel Investments (Fry), and the ADEQ met to discuss the VRP and the VRP requirements.
7/26/2019	AEI submitted the Work Plan, Source Investigation to the ADEQ.
8/7/2019	AEI conducted a fourth indoor air sampling event . Results indicated PCE concentrations above the indoor air US EPA RSL in the dry cleaning suite (DC-N and DC-S) and the northerly tenant suite (A-N). TCE was not detected at concentrations exceeding the laboratory method reporting limit in the five samples collected at the Site.
8/13/2019	ADEQ approved the Work Plan, Source Investigation with conditions.
Sepember 2019	The dry cleaning tenant suite was renovated including placement of Retro Coat on the floor and replacement of the PCE machine with a hydrocarbon-based solvent machine.
9/3-15/2019	AEI implemented the Work Plan, Source Investigation. Source area boring AB-8 was installed on the east side of the dry cleaning suite to a depth of 117 feet bgs. Results indicated moderate concentrations of PCE with the highest concentration observed in soil gas at 25 feet bgs. Calculated PCE concentrations in soil were below the SRLs and GPLs.
9/16-17/2019	AEI implemented the Work Plan, Source Investigation. Lateral boring AB-9 and AB-10 were installed on the south and west sides of the dry cleaning suite to a depth of 45 feet bgs. Results indicated elevated concentrations of PCE at 25 feet bgs in both AB-9 and AB-10, which attenuated with depth. Calculated PCE concentrations in soil were below the SRLs and GPLs.
10/30/2019	AEI conducted an indoor air sampling event . Results indicated PCE concentrations below the indoor air US EPA RSL in the dry cleaning suite (DC-N and DC-S) and the northerly tenant suite (A-N). TCE was not detected at concentrations exceeding the laboratory method reporting limit in the four samples collected at the Site.

Notes:

ADEQ	Arizona Department of Environmental Quality
ppbv	parts per billion by volume
US EPA RSL	United States Environmental Protection Agency Regional Screening Level
GPL	ADEQ Minimum Groundwater Protection Level.
µg/m^3	micrograms per cubic meter
PCE	Tetrachloroethene
REC	recognized environmental condition
SRL	ADEQ Soil Remediation Level
SSD	Sub-slab depressurization
TCE	Trichloroethene
VOCs	Volatile Organic Compounds
VRP	Voluntary Remediation Program

TABLE 2a: SOIL GAS SAMPLE DATA SUMMARY - DRY CLEANER VOCs

4432 North Miller Road, Scottsdale, Arizona 85251 (VRP Site Code 513272-00)

VOCs by U.S. EPA Method TO-15

Location ID	Date	Depth	PCE	TCE	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	VC	Helium (He)	(He) under Shroud	Max (He) Allowed in Sample
		(feet bgs)	(µg/m^3)	(µg/m^3)	(µg/m^3)	(µg/m^3)	(µg/m^3)	(µg/m^3)	%	%	%
PHASE II SUBSURFACE INVESTIGATION, JANUARY 2019											
SS-1	1/16/2019	0.5	865	10.5	<1.59	<1.59	<1.59	<1.02	<0.100	25.8	1.29%
SS-2	1/16/2019	0.5	1,470	5.37	<1.59	<1.59	<1.59	<1.02	<0.100	25.2	1.26%
SS-3	1/16/2019	0.5	1,530	45.9	<1.59	<1.59	<1.59	<1.02	<0.100	26.5	1.33%
SS-4	1/16/2019	0.5	**3,300**	49.3	<1.59	<1.59	<1.59	<1.02	<0.100	28.2	1.41%
SS-5	1/16/2019	0.5	**1,710**	42.6	<1.59	<1.59	<1.59	<1.02	<0.100	25.9	1.30%
SS-6	1/16/2019	0.5	**2,440**	51.0	<1.59	<1.59	<1.59	<1.02	<0.100	26.1	1.31%
SS-7	1/16/2019	0.5	611	4.47	<1.59	<1.59	<1.59	<1.02	<0.100	26.3	1.32%
SS-8	1/16/2019	0.5	1,010	5.7	<1.59	<1.59	<1.59	<1.02	<0.100	27.3	1.37%
AB-1-SV5	1/16/2019	5	**2,920**	70.4	<1.59	<1.59	<1.59	<1.02	<0.100	23.7	1.19%
AB-2-SV5	1/16/2019	5	**5,380**	48.9	<1.59	<1.59	<1.59	<1.02	<0.100	27.1	1.36%
AB-4-SV5	1/16/2019	5	**11,500**	**234**	<1.59	41.8	<1.59	<1.02	<0.100	28.2	1.41%
AB-5-SV5	1/14/2019	5	677	5.41	<1.59	<1.59	<1.59	<1.02	<0.100	26.4	1.32%
AB-6-SV5	1/14/2019	5	41.4	2.77	<1.59	<1.59	<1.59	<1.02	<0.100	25.6	1.28%
AB-7-SV5	1/14/2019	5	75.8	<2.14	<1.59	<1.59	<1.59	<1.02	<0.100	25.9	1.30%
LIMITED INDOOR AIR QUALITY ASSESSMENT, MARCH 2019 (BUILDINGS K AND L)											
SS-9	3/1/2019	0.5	484	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	20.9	1.05%
SS-10	3/1/2019	0.5	<1.36	<1.07	<0.793	<0.793	<0.793	<0.511	0.175	23.5	1.18%
SS-11	3/1/2019	0.5	115	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	23.9	1.20%
SS-12	3/1/2019	0.5	35.2	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	22.6	1.13%
VRP SITE CHARACTERIZATION, SEPTEMBER 2019											
AB-8-6	9/3/2019	6	37.7	<1.07	<0.793	<0.793	<0.793	<0.511	0.631	21.3	1.07%
AB-8-15	9/3/2019	15	14.9	<1.07	<0.793	<0.793	<0.793	<0.511	0.251	22.5	1.13%
AB-8-25	9/3/2019	25	886	3.54	<0.793	<0.793	<0.793	<0.511	0.420	23.1	1.16%
AB-8-25(Dup)	9/3/2019	25	**1,670**	5.26	<0.793	<0.793	<0.793	<0.511	0.129	22.9	1.15%
AB-8-35	9/14/2019	35	185	<1.07	<0.793	<0.793	<0.793	<0.511	0.144	27.2	1.36%
AB-8-45	9/14/2019	45	19.5	1.60	<0.793	<0.793	<0.793	<0.511	<0.100	22.9	1.15%
AB-8-55	9/14/2019	55	148	13.1	<0.793	1.65	<0.793	<0.511	0.104	23.8	1.19%
AB-8-65	9/14/2019	65	141	13.4	1.31	<0.793	<0.793	<0.511	<0.100	24.7	1.24%
AB-8-85	9/15/2019	85	<1.36	2.11	<0.793	<0.793	<0.793	<0.511	<0.100	27.1	1.36%
AB-8-110	9/15/2019	110	10.9	1.38	<0.793	<0.793	<0.793	<0.511	<0.100	24.8	1.24%
AB-9-5.5	9/17/2019	6.5	10.9	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	23.9	1.20%
AB-9-15	9/17/2019	15	243	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	24.8	1.24%
AB-9-25	9/17/2019	25	**5,750**	16.4	<0.793	<0.793	<0.793	<0.511	<0.100	28.2	1.41%
AB-9-25 (Dup)	9/17/2019	25	**4,790**	20.2	<0.793	<0.793	<0.793	<0.511	<0.100	25.1	1.26%
AB-9-45	9/17/2019	45	312	9.20	<0.793	<0.793	<0.793	<0.511	<0.100	23.9	1.20%
AB-10-5	9/16/2019	5	42.2	1.07	<0.793	<0.793	<0.793	<0.511	0.261	24.9	1.25%
AB-10-15	9/16/2019	15	195	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	24.2	1.21%
AB-10-25	9/16/2019	25	790	1.87	<0.793	<0.793	<0.793	<0.511	<0.100	25.4	1.27%
AB-10-35	9/16/2019	35	891	1.65	<0.793	<0.793	<0.793	<0.511	<0.100	26.8	1.34%
AB-10-45	9/16/2019	45	403	2.71	<0.793	<0.793	<0.793	<0.511	<0.100	24.3	1.22%
Limited Indoor Air Quality and Soil Gas Rebound Sampling – January 2020											
SS-1	1/23/2020	0.5	568	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	25.9	1.30%
SS-2	1/23/2020	0.5	16.3	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	26.3	1.32%
SS-3	1/23/2020	0.5	441	4.47	<0.793	<0.793	<0.793	<0.511	<0.100	25.4	1.27%
SS-4	1/23/2020	0.5	109	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	23.5	1.18%
SS-5	1/23/2020	0.5	288	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	28.5	1.43%
SS-5 (Duplicate)	1/23/2020	0.5	151	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	27.2	1.36%
SS-6	1/23/2020	0.5	113	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	24.4	1.22%
SS-7	1/23/2020	0.5	239	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	26.5	1.33%
M-1	1/23/2020	2.0	507	2.00	<0.793	<0.793	<0.793	<0.511	<0.100	27.5	1.38%
M-2	1/23/2020	2.0	930	<1.07	<0.793	<0.793	<0.793	<0.511	<0.100	27.3	1.37%
M-5	1/23/2020	2.0	493	<1.07	<0.793	<0.793	<0.793	<0.511	2.69	24.4	1.22%
Comparison Values:											
	US EPA RSL (Industrial Air):		47	3.0	880	--	--	2.8	--	--	--
	Attenuated Soil Gas:		1,567	100	29,333	--	--	93	--	--	--

Notes:

µg/m^3	Micrograms per cubic meter
<RDL	Less than the laboratory reported detection limit
--	No established comparison value
bgs	Bbelow ground surface
Bold	Exceeds the applicable comparison value
VOCs	Volatile organic compounds
PCE	Tetrachloroethene
TCE	Trichloroethene
DCE	1,1-Dichloroethene
trans-1,2-DCE	trans-1,2-Dichloroethene
VC	Vinyl Chloride
cis-1,2-DCE	cis-1,2-Dichloroethene
US EPA RSL:	April 2019-Regional Screening Level (RSL) for Industrial Air issued by the United States Environmental Protection Agency (US EPA) with a target risk (TR) for cancer of 1E-06 and hazard quotient of 1.0 - modified for soil gas by applying an attenuation factor of 0.03 to RSLs in accordance with US EPA guidelines (OSWER publication 9200.0-154, June 2015)

TABLE 2b: SOIL GAS SAMPLE DATA SUMMARY - REMAINING VOCs
4432 North Miller Road, Scottsdale, Arizona 85251 (VRP Site Code 513272-00)

VOCs by U.S. EPA Method TO-15

Location ID	Date	Depth (feet bgs)	Acetone (µg/m³)	Benzene (µg/m³)	Toluene (µg/m³)	Ethyl-benzene (µg/m³)	Total Xylenes (µg/m³)	Bromo-dichloro-methane (µg/m³)	1,3-Butadiene (µg/m³)	Carbon Disulfide (µg/m³)	Chloro-ethane (µg/m³)	Chloro-form (µg/m³)	Chloro-methane (µg/m³)	Cyclo-hexane (µg/m³)	Dibromo-chloro-methane (µg/m³)	1,4-Dioxane (µg/m³)	Ethanol (µg/m³)	4-Ethyl-toluene (µg/m³)	Trichloro-fluoro-methane (µg/m³)	Dichloro-difluoro-methane (µg/m³)	Heptane (µg/m³)
PHASE II SUBSURFACE INVESTIGATION, JANUARY 2019																					
SS-1	1/16/2019	0.5	120	<1.28	5.62	1.77	12.33	<2.68	<8.85	<1.24	<1.06	<1.95	3.05	<1.38	<3.40	3.29	134	3.75	<2.25	<1.98	<1.64
SS-2	1/16/2019	0.5	483	<1.28	3.86	<1.73	<5.20	<2.68	<8.85	<1.24	11.4	<1.95	<0.826	<1.38	<3.40	<1.44	265	<1.96	<2.25	<1.98	<1.64
SS-3	1/16/2019	0.5	50.4	1.74	<1.51	<1.73	<5.20	<2.68	<8.85	<1.24	<1.06	<1.95	<0.826	<1.38	<3.40	<1.44	10.1	<1.96	<2.25	2.08	<1.64
SS-4	1/16/2019	0.5	84.7	<1.28	1.96	1.81	20.82	<2.68	<8.85	<1.24	<1.06	<1.95	<0.826	<1.38	<3.40	2.17	30.4	<1.96	<2.25	<1.98	<1.64
SS-5	1/16/2019	0.5	206	<1.28	2.58	<1.73	4.50	<2.68	<8.85	2.06	<1.06	<1.95	<0.826	<1.38	<3.40	13.8	56.4	<1.96	<2.25	2.00	<1.64
SS-6	1/16/2019	0.5	86.7	2.86	<1.51	<1.73	<5.20	<2.68	<8.85	<1.24	<1.06	<1.95	<0.826	<1.38	<3.40	<1.44	52.1	<1.96	<2.25	<1.98	<1.64
SS-7	1/16/2019	0.5	77.7	<1.28	2.68	<1.73	<5.20	<2.68	<8.85	1.79	<1.06	<1.95	<0.826	<1.38	<3.40	<1.44	272	5.99	<2.25	2.00	<1.64
SS-8	1/16/2019	0.5	75.0	<1.28	1.56	<1.73	<5.20	<2.68	<8.85	<1.24	<1.06	2.87	<0.826	<1.38	<3.40	<1.44	596	<1.96	<2.25	<1.98	<1.64
AB-1-SV5	1/16/2019	5	14.8	1.58	25.0	11.7	61.8	<2.68	<8.85	5.36	<1.06	<1.95	<0.826	4.12	<3.40	<1.44	9.42	22.6	5.79	2.08	4.65
AB-2-SV5	1/16/2019	5	17.3	3.43	47.1	17.7	96.1	<2.68	<8.85	2.96	<1.06	<1.95	<0.826	6.38	<3.40	<1.44	5.95	29.4	13.5	2.18	7.07
AB-4-SV5	1/16/2019	5	14.1	6.88	43.5	8.09	34.5	**22.6**	<8.85	13.8	<1.06	**45.7**	<0.826	8.50	12.4	<1.44	23.0	8.77	<2.25	<1.98	5.42
AB-5-SV5	1/14/2019	5	123	11.2	101	27.5	123.6	<2.68	<8.85	5.99	<1.06	<1.95	<0.826	9.30	<3.40	<1.44	18.8	30.1	32.6	2.45	21.3
AB-6-SV5	1/14/2019	5	29.6	10.9	107	26.0	115.5	<2.68	<8.85	3.40	<1.06	<1.95	1.13	11.2	<3.40	<1.44	12.9	26.4	<2.25	<1.98	22.8
AB-7-SV5	1/14/2019	5	49.9	12.0	85.2	27.0	128.7	<2.68	9.42	7.52	<1.06	<1.95	2.83	10.7	<3.40	<1.44	15.4	33.9	<2.25	1.99	17.3
VRP SITE CHARACTERIZATION, SEPTEMBER 2019																					
AB-8-6	9/3/2019	6	1,110	15.7	48.2	2.84	11.21	<1.34	**52.7**	62.8	2.92	<0.973	4.89	27.8	<1.70	<0.721	263	1.52	1.43	1.76	41.8
AB-8-15	9/3/2019	15	909	18.1	16.8	<0.867	<2.597	<1.34	**82.8**	23.3	4.74	<0.973	21.9	17.5	<1.70	<0.721	83.8	<0.982	2.16	2.00	76.0
AB-8-25	9/3/2019	25	598	19.0	10.3	<0.867	<2.597	3.50	**50.8**	18.0	3.53	<0.973	8.75	3.27	<1.70	<0.721	210	<0.982	63.4	2.34	61.8
AB-8-25(Dup)	9/3/2019	25	224	24.6	19.9	<0.867	<2.597	4.54	**48.6**	13.1	3.32	<0.973	8.16	3.66	<1.70	<0.721	91.9	<0.982	60.2	2.27	82.9
AB-8-35	9/14/2019	35	319	**183**	1,410	**183**	713	<1.34	**45.4**	30.3	<0.526	<0.973	3.36	183	<1.70	<0.721	366	111	38.2	2.73	284
AB-8-45	9/14/2019	45	107	**91.6**	746	64.5	261.2	<1.34	**40.6**	7.29	<0.526	<0.973	2.03	108	<1.70	<0.721	229	33.3	53.2	2.83	151
AB-8-55	9/14/2019	55	270	**198**	1,340	**185**	666	<1.34	4.54	13.3	<0.528	<0.973	0.493	239	<1.70	<0.721	527	117	404	11.0	308
AB-8-65	9/14/2019	65	348	**137**	868	76.5	277.7	<1.34	**33.3**	13.4	<0.528	<0.973	1.94	160	<1.70	<0.721	276	25.5	326	7.69	217
AB-8-85	9/15/2019	85	88.8	**55.6**	328	40.8	174.9	<1.34	<4.43	2.69	<0.528	<0.973	1.33	96.5	<1.70	<0.721	115	26.9	1.26	2.39	101
AB-8-110	9/15/2019	110	137	**60.5**	352	40.8	160.8	<1.34	5.79	<0.622	<0.528	<0.973	1.11	100	<1.70	<0.721	142	17.3	106	4.95	103
AB-9-6.5	9/17/2019	5	94.6	6.26	81.9	14.9	69.2	<1.34	<4.43	58.7	<0.526	<0.973	1.32	9.86	<1.70	<0.721	63.6	9.36	1.33	2.39	17.0
AB-9-15	9/17/2019	15	661	34.0	2,590	38.4	154.7	<1.34	**53.5**	72.0	<0.526	<0.973	2.65	35.7	<1.70	<0.721	342	12.4	5.19	2.68	78.4
AB-9-25	9/17/2019	25	331	38.7	1930	44.3	177.7	<1.34	**74.4**	39.9	<0.526	<0.973	3.44	48.9	<1.70	<0.721	177	14.4	230	<0.989	93.0
AEI-Dup	9/17/2019	25	887	37.3	3,880	46.8	195	<1.34	**76.6**	105	<0.526	<0.973	1.97	30.8	<1.70	<0.721	436	17.5	252	<0.989	86.8
AB-9-45	9/17/2019	45	457	**197**	2,230	137	644	<1.34	**221**	40.5	<0.526	<0.973	7.86	104	<1.70	<1.44	412	78.5	236	<0.989	353
AB-10-5	9/16/2019	5	165	26.5	254	40.9	180.1	<1.34	<4.43	13.8	0.916	<0.973	2.70	31.4	<1.70	<0.721	124	16.9	1.34	2.44	45.4
AB-10-15	9/16/2019	15	214	**101**	350	97.2	397.4	10.2	**67.8**	21.9	<0.528	<0.973	1.70	126	<1.70	<0.721	232	51.2	4.89	3.65	175
AB-10-25	9/16/2019	25	227	**63.9**	405	63.0	254.5	6.92	**49.7**	12.7	<0.528	<0.973	1.44	98.3	<1.70	<0.721	146	28.5	15.6	6.53	141
AB-10-35	9/16/2019	35	269	31.7	1,090	37.6	152.8	9.80	5.53	5.67	<0.528	**44.6**	1.30	48.3	<1.70	<0.721	178	19.1	15.5	6.45	65.5
AB-10-45	9/16/2019	45	282	**102**	1,760	76.9	304.6	**27.0**	**83.3**	18.5	<0.528	**126**	6.63	145	2.49	<0.721	196	25.9	28.3	9.77	278
Comparison Values:																					
US EPA RSL (Industrial Air):			140,000	1.6	22,000	4.9	440	0.33	0.41	3,100	44,000	0.53	390	26,000	--	2.5	--	--	--	440	1,800
Attenuated for Soil Gas:			4,666,667	53	733,333	163	14,667	11.0	13.7	103,333	1,466,667	18	13,000	866,667	--	83	--	--	--	14,667	60,000

Notes:

µg/m³	micrograms per cubic meter
<RDL	less than the laboratory detection limit for reporting
--	No established comparison value
bgs	below ground surface
N/A	not applicable
VOCs	Volatile organic compounds
Bold	Exceeds the applicable comparison value
TMB	Trimethylbenzene
TMP	Trimethylpentane
MEK	Methyl Ethyl Ketone (2-Butanone)
MIBK	Methyl Isobutyl Ketone (4-Methyl-2-pentanone)

B1 Target analyte detected in method blank at or above the method reporting limit

US EPA RSL: November 2018-Regional Screening Level (RSL) for Industrial Air issued by the United States Environmental Protection Agency (US EPA) with a target risk (TR) for cancer of 1E-06 and hazard quotient of 1.0 - modified for soil gas by applying an attenuation factor of 0.03 to RSLs in accordance with US EPA guidelines (OSWER publication 9200.0-154, June 2015)

TABLE 2b: SOIL GAS SAMPLE DATA SUMMARY - REMAINING VOCs
4432 North Miller Road, Scottsdale, Arizona 85251 (VRP Site Code 513272-00)

VOCs by U.S. EPA Method TO-15

Location ID	Date	Depth (feet bgs)	n-Hexane (µg/m³)	Isopropyl Benzene (µg/m³)	Methylene Chloride (µg/m³)	Methyl-Butyl Ketone (µg/m³)	MEK (µg/m³)	MIBK (µg/m³)	Methyl metha-crylate (µg/m³)	Naphthalene (µg/m³)	2-Propanol (µg/m³)	Propene (µg/m³)	Styrene (µg/m³)	Tetrahydro-furan (µg/m³)	1,2,4-TMB (µg/m³)	1,3,5-TMB (µg/m³)	2,2,4-TMP (µg/m³)	Remaining VOCs (µg/m³)
PHASE II SUBSURFACE INVESTIGATION, JANUARY 2019																		
SS-1	1/16/2019	0.5	<1.41	<1.97	8.83	<10.2	13.2	<10.2	<1.64	N/A	124	<1.38	<1.70	<1.18	5.87	<1.96	<1.87	<RDL
SS-2	1/16/2019	0.5	<1.41	<1.97	<1.39	<10.2	<7.37	<10.2	<1.64	N/A	508	<1.38	2.70	<1.18	2.20	<1.96	<1.87	<RDL
SS-3	1/16/2019	0.5	<1.41	5.04	4.69	<10.2	<7.37	<10.2	<1.64	N/A	<6.15	<1.38	<1.70	<1.18	2.25	<1.96	<1.87	<RDL
SS-4	1/16/2019	0.5	<1.41	3.88	4.15	<10.2	<7.37	<10.2	<1.64	N/A	6.80	<1.38	<1.70	<1.18	2.57	<1.96	<1.87	<RDL
SS-5	1/16/2019	0.5	<1.41	<1.97	6.54	<10.2	24.9	12.0	<1.64	N/A	22.3	<1.38	<1.70	3.88	2.81	<1.96	<1.87	<RDL
SS-6	1/16/2019	0.5	<1.41	<1.97	3.69	<10.2	<7.37	<10.2	<1.64	N/A	18.7	<1.38	<1.70	<1.18	<1.96	<1.96	<1.87	<RDL
SS-7	1/16/2019	0.5	<1.41	<1.97	<1.39	<10.2	<7.37	<10.2	<1.64	N/A	8.29	1.58	<1.70	<1.18	10.6	3.55	<1.87	<RDL
SS-8	1/16/2019	0.5	<1.41	<1.97	<1.39	<10.2	8.12	<10.2	<1.64	N/A	8.92	<1.38	<1.70	2.45	<1.96	<1.96	<1.87	<RDL
AB-1-5	1/16/2019	5	3.92	<1.97	10.5	<10.2	<7.37	<10.2	<1.64	N/A	<6.15	<1.38	<1.70	<1.18	27.9	7.72	3.74	<RDL
AB-2-5	1/16/2019	5	5.94	<1.97	4.01	<10.2	<7.37	<10.2	<1.64	N/A	<6.15	1.72	<1.70	<1.18	35.3	10.2	5.90	<RDL
AB-4-5	1/16/2019	5	9.25	<1.97	6.31	<10.2	<7.37	<10.2	<1.64	N/A	<6.15	<1.38	<1.70	<1.18	9.00	2.67	8.92	<RDL
AB-5-5	1/14/2019	5	19.6	2.25	1.75	<10.2	21.2	<10.2	<1.64	N/A	<6.15	47.3	<1.70	<1.18	29.8	8.48	11.0	<RDL
AB-6-5	1/14/2019	5	18.5	2.00	3.55	<10.2	<7.37	<10.2	<1.64	N/A	<6.15	32.1	<1.70	<1.18	24.0	6.97	12.5	<RDL
AB-7-5	1/14/2019	5	20.1	2.28	2.53	<10.2	8.17	<10.2	1.87	N/A	<6.15	63.8	<1.70	<1.18	34.6	9.56	11.5	<RDL
VRP SITE CHARACTERIZATION, SEPTEMBER 2019																		
AB-8-6	9/3/2019	6	53.4	<0.983	1.15[B1]	106	515	51.8	<0.819	3.64[B1]	54.4	1,120	<0.851	<0.590	4.00	<0.982	<0.934	<RDL
AB-8-15	9/3/2019	15	122	<0.983	5.02	72.8	618	14.7	<0.819	ND<3.30	19.3	1,600	<0.851	<0.590	<0.982	<0.982	63.5	<RDL
AB-8-25	9/3/2019	25	80.2	<0.983	1.06[B1]	118	1,080	12.8	<0.819	ND<3.30	26.8	1,080	<0.851	<0.590	1.47	<0.982	<0.934	<RDL
AB-8-25(Dup)	9/3/2019	25	88.3	<0.983	1.74[B1]	79.1	287	9.40	<0.819	ND<3.30	15.6	934	<0.851	<0.590	<0.982	<0.982	<0.934	<RDL
AB-8-35	9/3/2019	35	325	<0.983	<0.694	44.7	276	12.4	<0.819	ND<3.30	<3.07	519	<0.851	256	97.1	27.5	206	<RDL
AB-8-45	9/3/2019	45	289	<0.983	21.0	23.5	327	<5.12	<0.819	ND<3.30	<3.07	1,660	<0.851	185	26.5	7.85	108	<RDL
AB-8-55	9/3/2019	55	392	<0.983	<0.694	112	445	<5.12	<0.819	ND<3.30	<3.07	101	<0.851	349	102	29.0	251	<RDL
AB-8-65	9/3/2019	65	286	<0.983	9.13	107	780	7.46	<0.819	ND<3.30	<3.07	437	<0.851	225	17.6	5.31	161	<RDL
AB-8-85	9/3/2019	85	132	<0.983	13.3	<10.2	42.2	<5.12	<0.819	ND<3.30	<3.07	18.1	<0.851	121	24.9	7.39	114	<RDL
AB-8-105	9/3/2019	105	152	<0.983	23.7	21.4	316	<5.12	<0.819	ND<3.30	<3.07	87.9	<0.851	130	12.0	3.71	121	<RDL
AB-9-5	9/3/2019	5	13.0	<0.983	0.702[B1]	68.9	236	<5.12	<0.819	ND<3.30	<3.07	15.3	<0.851	<0.590	7.74	2.45	21.7	<RDL
AB-9-15	9/3/2019	15	87.7	<0.983	<0.694	179	429	6.43	<0.819	ND<3.30	<3.07	597	<0.851	<0.590	7.99	3.00	85.8	<RDL
AB-9-25	9/3/2019	25	119	<0.983	<0.694	218	1,110	5.49	<0.819	ND<3.30	<3.07	962	<0.851	<0.590	10.6	3.82	115	<RDL
AEI-Dup	9/3/2019	25	113	<0.983	<0.694	169	347	5.97	<0.819	ND<3.30	<3.07	964	<0.851	<0.590	12.5	4.47	72.9	<RDL
AB-9-45	9/3/2019	45	618	<0.983	<0.694	158	1,050	9.12	<0.819	ND<3.30	<3.07	5,140	<0.851	<0.590	69.1	20.8	267	<RDL
AB-10-5	9/3/2019	5	42.2	<0.983	0.848[B1]	73.3	390	<5.12	<0.819	ND<3.30	<3.07	48.1	<0.851	39.1	15.9	4.06	44.2	<RDL
AB-10-15	9/3/2019	15	106	<0.983	<0.694	193	288	9.15	<0.819	ND<3.30	<3.07	661	<0.851	74.0	42.4	13.2	182	<RDL
AB-10-25	9/3/2019	25	167	<0.983	7.40	138	394	5.37	<0.819	ND<3.30	<3.07	1,690	<0.851	116	21.4	7.39	133	<RDL
AB-10-35	9/3/2019	35	73.6	<0.983	5.88	90.7	437	<5.12	<0.819	ND<3.30	<3.07	425	<0.851	62.4	15.6	4.49	60.5	<RDL
AB-10-45	9/3/2019	45	427	<0.983	12.2	236	1,880	9.60	<0.819	ND<3.30	<3.07	2,880	<0.851	171	31.2	15.1	159	<RDL
Comparison Values:																		
US EPA RSL (Industrial Air):			3,100	--	1,200	130	22,000	13,000	13,000	0.36	880	13,000	4,400	--	260	260	--	Various
Attenuated Soil Gas:			103,333	--	40,000	4,333	733,333	433,333	433,333	12	29,333	433,333	146,667	--	8,667	8,667	--	Various

Notes:

µg/m³	Micrograms per cubic meter
<RDL	less than the laboratory detection limit for reporting
--	No established comparison value
bgs	Below ground surface
N/A	Not applicable
VOCs	Volatile organic compounds
Bold	Exceeds the applicable comparison value
TMB	Trimethylbenzene
TMP	Trimethylpentane
MEK	Methyl Ethyl Ketone (2-Butanone)
MIBK	Methyl Isobutyl Ketone (4-Methyl-2-pentanone)

B1	Target analyte detected in method blank at or above the method reporting limit
E4	Concentration Estimated. Analyte detected below MRL/RDL but above method detection limit (MDL)
US EPA RSL:	November 2018-Regional Screening Level (RSL) for Industrial Air issued by the United States Environmental Protection Agency (US EPA) with a target risk (TR) for cancer of 1E-06 and hazard quotient of 1.0 - modified for soil vapor by applying an attenuation factor of 0.03 to RSLs in accordance with US EPA guidelines (OSWER publication 9200.0-154, June 2015)

TABLE 3: INDOOR AIR SAMPLE DATA SUMMARY
4432 North Miller Road, Scottsdale, Arizona

Location ID	Date	PCE (µg/m^3)	TCE (µg/m^3)	1,1-DCE (µg/m^3)	Cis-1,2-DCE (µg/m^3)	Trans-1,2-DCE (µg/m^3)	VC (µg/m^3)
DC-S	12/28/18	**2,120**	**19.9**	<0.793	4.24	<0.793	<0.511
	03/25/19	**216**	<1.07	<0.793	<0.793	<0.793	<0.511
	05/02/19	**158**	<1.07	<0.793	<0.793	<0.793	<0.511
	08/07/19	**175**	<1.07	<0.793	<0.793	<0.793	<0.511
	10/30/19	6.55	<1.07	<0.793	<0.793	<0.793	<0.511
	01/22/20	2.47	<1.07	<0.793	<0.793	<0.793	<0.511
DC-N	12/28/18	**2,700**	**18.7**	<0.793	<0.793	<0.793	<0.511
	03/25/19	**220**	<1.07	<0.793	<0.793	<0.793	<0.511
	05/02/19	**186**	<1.07	<0.793	<0.793	<0.793	<0.511
	08/07/19	**145**	<1.07	<0.793	<0.793	<0.793	<0.511
	10/30/19	6.86	<1.07	<0.793	<0.793	<0.793	<0.511
	01/22/20	2.48	<1.07	<0.793	<0.793	<0.793	<0.511
A-N	12/28/18	**1,990**	**24.9**	<0.793	<0.793	<0.793	<0.511
	03/25/19	**77.2**	<1.07	<0.793	<0.793	<0.793	<0.511
	05/02/19	**104**	<1.07	<0.793	<0.793	<0.793	<0.511
	08/07/19	**62.3**	<1.07	<0.793	<0.793	<0.793	<0.511
	10/30/19	3.24	<1.07	<0.793	<0.793	<0.793	<0.511
	01/22/20	7.74	<1.07	<0.793	<0.793	<0.793	<0.511
A-S	12/28/18	**1,040**	**17.4**	<0.793	<0.793	<0.793	<0.511
	03/25/19	<1.36	<1.07	<0.793	<0.793	<0.793	<0.511
	05/02/19	31.3	<1.07	<0.793	<0.793	<0.793	<0.511
	08/07/19	45.8	<1.07	<0.793	<0.793	<0.793	<0.511
	10/30/19	NA	NA	NA	NA	<0.793	<0.511
	01/22/20	<1.36	<1.07	<0.793	<0.793	<0.793	<0.511
OC	12/28/18	13.3	<1.07	<0.793	<0.793	<0.793	<0.511
	03/25/19	<1.36	<1.07	<0.793	<0.793	<0.793	<0.511
	05/02/19	<1.36	<1.07	<0.793	<0.793	<0.793	<0.511
	08/07/19	6.72	<1.07	<0.793	<0.793	<0.793	<0.511
	10/30/19	1.36	<1.07	<0.793	<0.793	<0.793	<0.511
	01/22/20	<1.36	<1.07	<0.793	<0.793	<0.793	<0.511
Comparison Values:							
RSL		47	3.0	880	--	--	2.8

Notes:

µg/m^3	micrograms per cubic meter	PCE	Tetrachloroethene
<RDL	less than the laboratory reported detection limit	TCE	Trichloroethene
--	No established comparison value	DCE	1,1-Dichloroethene
bgs	below ground surface	Cis-1,2-DCE	cis-1,2-Dichloroethene
Bold	Exceeds the applicable comparison value	Trans-1,2-DCE	trans-1,2-Dichloroethene
NA	Not analyzed	VC	Vinyl Chloride

Comparison Values:

RSL Based on Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) for Industrial Air, with a target cancer risk (TR) of 1E-06 and target hazard quotient (THQ) of 1.0, dated November 2019.

TABLE 4: Three-Phase Partitioning Equations
Soil Gas to Soil Concentration Conversion
4432 North Miller Road, Scottsdale, Arizona 85251
VRP Site Code: 513272-00

COPC	Sample ID	Depth (feet bgs)	Maximum Concentration in Soil Gas µg/m³	Maximum Concentration in Soil Gas µg/L	Calculated COPC Concentration in Soil µg/kg	Calculated COPC Concentration in Soil mg/kg	Comparison Values 1E-06-SRL mg/kg	1E-05-SRL mg/kg	r- SRL mg/kg	nr-SRL mg/kg	GPL mg/kg
PCE	AB-4-5	5	11,500	11.50	6.99	*0.006990*	0.51	5.1	NE	13	0.80
TCE	AB-4-5	5	234	0.234	0.22	*0.000220*	3.0	30	17	65	0.76
Acetone	AB-8-6	6	1,110	1.110	NA	NA	NE	NE	14,000	54,000	NE
Benzene	AB-8-35	35	183	0.183	0.19	*0.000190*	0.65	NE	NE	1.4	0.70
Benzyl chloride	All	NA	<2.08	<0.002	0.01	*<0.00001*	0.92	9.2	NE	22	NE
Bromodichloromethane	AB-4-5	5	22.6	0.023	0.07	*0.000070*	0.83	8.3	NE	18	NE
Bromoform	All	NA	<12.4	<0.012	0.12	*<0.00012*	69	690	NE	2,200	NE
Bromomethane	All	NA	<1.55	<0.002	NA	NA	NA	NA	3.9	13	NE
1,3-Butadiene	AB-10-45	45	83.3	0.083	0.02	*0.000020*	0.058	0.58	NE	1.2	NE
Carbon disulfide	AB-9-25	25	105	0.105	0.04	0.000040	NA	NE	360	720	NE
Carbon tetrachloride	All	NA	<2.52	<0.003	0.00	*<0.00000*	0.25	2.5	2.2	5.5	0.95
Chlorobenzene	All	NA	<1.85	<0.002	0.00	<0.00000	NE	NE	150	530	16.5
Chloroethane	SS-2	0.5	11.4	0.011	NA	NA	3.0	30	NE	65	NE
Chloroform	AB-10-45	45	126	0.126	0.17	*0.000170*	0.94	9.4	NE	20	6.8
Chloromethane	AB-8-15	15	21.9	0.022	NA	NA	NE	NE	48	160	NE
2-Chlorotoluene	All	NA	<2.06	<0.002	0.00	<0.00000	NE	NE	160	510	NE
Cyclohexane	AB-8-55	55	239	0.239	0.07	0.000070	NE	NE	140	140	NE
Dibromochloromenthane	All	NA	<3.40	<0.003	0.00	*<0.00000*	1.1	11	NE	26	NE
1,2-Dibromoethane	All	NA	<3.08	<0.003	0.02	*<0.00002*	0.029	0.29	NE	0.63	NE
1,2-Dichlorobenzene	All	NA	<2.40	<0.002	0.02	<0.00002	NE	NE	600	600	116
1,3-Dichlorobenzene	All	NA	<2.40	<0.002	NA	NA	NE	NE	530	600	NE
1,4-Dichlorobenzene	All	NA	<2.40	<0.002	0.02	*<0.00002*	3.5	35	NE	79	27
1,2-Dichloroethane	All	NA	<1.62	<0.002	0.02	*<0.00002*	0.28	2.8	NE	6.0	0.23
1,1-Dichloroethane	All	NA	<1.60	<0.002	0.00	<0.000000	NE	NE	510	1,700	NE
1,1-Dichloroethene	AB-8-65	65	1.31	0.001	0.00	0.000000	NE	NE	120	410	0.85
cis-1,2-Dichloroethene	AB-8-55	55	1.65	0.002	0.00	0.000000	NE	NE	43	150	5.3
trans-1,2-Dichloroethene	All	NA	<1.59	<0.002	0.00	<0.000000	NE	NE	69	230	9.2
1,2-Dichloropropane	All	NA	<1.85	<0.002	0.00	*<0.00000*	0.34	3.4	NE	7.4	0.36
1,4-Dioxane	SS-5	0.5	13.8	0.014	8.91	*0.008910*	50	500	NE	1,600	NE
Ethylbenzene	AB-8-55	55	185	0.185	0.32	0.000320	NE	NE	400	400	82
Isopropylbenzene	SS-3	0.5	5.04	0.005	NA	NA	NE	NE	92	92	NE
Trichlorofluoromethane	AB-8-55	55	404	0.404	NA	NA	NE	NE	390	1,300	NE
Dichlorodifluoromethane	AB-8-55	55	11.0	0.011	0.00	0.000000	NE	NE	94	310	NE
n-Hexane	AB-9-25	25	618	0.618	NA	NA	NE	NE	110	110	NE
Methylene Chloride	AB-8-105	105	23.7	0.024	0.04	*0.000040*	9.3	93	NE	210	NE
2-Butanone (MEK)	AB-10-45	45	1,880	1.880	215	0.215000	NE	NE	23,000	34,000	NE
4-Methyl-2-pentanone (MIBK)	AB-8-6	6	51.8	0.052	2.35	0.002350	NE	NE	5,300	17,000	NE
Methyl methacrylate	AB-7-5	5	1.87	0.002	NA	NA	NE	NE	2,200	2,700	NE
MTBE	All	NA	<1.44	<0.001	NA	NA	32	320	NE	710	NE
Naphthalene	All	NA	3.64	<0.004	0.24	<0.00024	NE	NE	56	190	NE
Styrene	SS-2	0.5	2.70	0.003	0.02	0.000020	NE	NE	1,500	1,500	45
1,1,2,2-Tetrachloroethane	All	NA	<1.37	<0.001	0.02	*<0.000020*	0.42	4.2	NE	9.3	NE
Tetrahydrofuran	AB-8-55	55	349	0.349	15.24	*0.015240*	9.5	95	NE	210	NE
Toluene	AB-9-25	25	3,880	3.880	5.29	0.005290	NE	NE	650	650	159
1,2,4-Trichlorobenzene	All	NA	<9.33	<0.009	NA	NA	NE	NE	62	220	NE
1,1,1-Trichloroethane	All	NA	<2.18	<0.002	0.00	<0.00000	NE	NE	1,200	1,200	0.94
1,1,2-Trichloroethane	All	NA	<2.18	<0.002	0.01	*<0.00001*	0.74	7.4	NE	16	NE
1,2,4-Trimethylbenzene	AB-8-55	55	102	0.102	1.70	0.001700	NE	NE	52	170	NE
1,3,5-Trimethylbenzene	AB-8-55	55	29.0	0.029	0.09	0.000090	NE	NE	21	70	NE
Vinyl chloride	All	NA	<1.02	<0.001	0.00	*<0.000000*	0.085	NE	NE	0.75	NE
Vinyl bromide	All	NA	<1.75	<0.002	NA	NA	0.19	1.9	NE	4.2	NE
Vinyl acetate	All	NA	<1.41	<0.001	0.01	<0.000010	NE	NE	430	1,400	NE
Total xylenes	AB-8-35	35	713.0	0.713	1.49	0.001490	NE	NE	270	420	31

Notes:

COPC	Compound of potential concern	NA	Not Applicable	µg/m³	micrograms per cubic meter
PCE	Tetrachloroethene	NE	Not Established	µg/l	micrograms per liter
TCE	Trichloroethene	bgs	below ground surface	µg/kg	micrograms per kilograms
MTBE	Methyl-tertbutyl-ether			mg/kg	milligrams per kilograms
0.023217	Does not exceed the 1E-06-SRL, protective of sensitive receptors such as schools and daycare facilities				

Comparison Values:

1E-06-SRL	Arizona Department of Environmental Quality (ADEQ) Residential Soil Remediation Level (SRL), 1E-06 Risk for Carcinogens, protective of schools and daycare facilities, 2009
1E-05-SRL	Arizona Department of Environmental Quality (ADEQ) Residential Soil Remediation Level (SRL), 1E-05 Risk for Carcinogens, protective of residential, 2009
r-SRL	Arizona Department of Environmental Quality (ADEQ) Residential Soil Remediation Level (SRL), 2009
nr-SRL	Arizona Department of Environmental Quality (ADEQ) Non-Residential Soil Remediation Level (SRL), 2009
GPL	Arizona Department of Environmental Quality (ADEQ) Minimum Groundwater Protection Level (GPL) from 2007 Spreadsheet Minimum GPL.

TABLE 5 - COMPOUNDS FOR NFA REQUEST
4432 North Miller Road, Scottsdale, Arizona 85251
VRP SITE CODE: 513272-00

List for Soil NFA:

PCE	1,2-Dibromoethane	4-Methyl-2-pentanone (MIBK)
TCE	1,2-Dichlorobenzene	Methyl methacrylate
Acetone	1,3-Dichlorobenzene	MTBE
Benzene	1,4-Dichlorobenzene	Napthalene
Benzyl chloride	1,2-Dichloroethane	Styrene
Bromodichloromethane	1,1-Dichloroethane (DCA)	1,1,2,2-Tetrachloroethane
Bromoform	1,1-Dichloroethene (DCE)	Tetrahydrofuran
Bromomethane	cis-1,2-Dichloroethene	Toluene
1,3-Butadiene	trans-1,2-Dichloroethene	1,2,4-Trichlorobenzene
Carbon disulfide	1,2-Dichloropropane	1,1,1-Trichloroethane
Carbon tetrachloride	1,4-Dioxane	1,1,2-Trichloroethane
Chlorobenzene	Ethylbenzene	1,2,4-Trimethylbenzene
Chloroethane	Isopropylbenzene	1,3,5-Trimethylbenzene
Chloroform	Trichlorofluoromethane	Vinyl chloride
Chloromethane	Dichlorodifluoromethane	Vinyl bromide
2-Chlorotoluene	n-Hexane	Vinyl acetate
Cyclohexane	Methylene Chloride	Total xylenes
Dibromochloromethane	2-Butanone (MEK)	

ATTACHMENT A

DRAFT PUBLIC NOTICE

Notice of 30-Day Public Comment Period
Camelback and Miller Plaza, Building H Voluntary Remediation Program
Request for No Further Action Determination

AEI Consultants (AEI), on behalf of Camel Investment, LLC, has submitted a request for a No Further Action (NFA) determination to the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) for a portion of the Camelback and Miller Plaza located at 4432 N. Miller Road, in Scottsdale, Arizona (VRP Site Code #513272-00). The NFA requests closure for soil at the site and was submitted in accordance with Arizona Revised Statutes § 49-181(A).

Camelback and Miller Plaza, Building H is located at 4432 N. Miller Road, in Scottsdale, Arizona. AEI conducted a subsurface investigation in September 2019. Low-level detections of tetrachloroethene (PCE) and trichloroethene (TCE), dry cleaning solvents, were observed in soil gas samples collected as part of investigative activities regarding a former dry cleaning facility at the Camelback and Miller Plaza. The concentrations of PCE, TCE, and other solvent-related volatile organic compounds (VOCs) in soil do not exceed the soil regulatory levels prescribed in the Arizona Administrative Code in any concentration detected. Indoor air samples confirm there is no observed risk to the current tenants of the commercial facility resulting from the former dry cleaning operations.

The NFA Report is available online at: http://azdeq.gov/notices, and at the ADEQ Records Center, 1110 W. Washington St., Phoenix, (602) 771-4380, or (800) 234-5677, ext. 6027714380; please call for hours of operation and to schedule an appointment.

PARTIES WISHING TO SUBMIT WRITTEN COMMENTS regarding the NFA request for the Camelback and Miller Plaza, Building H site may do so through the following contacts:

Arizona Department of Environmental Quality
Attention: Caitlin Burwell, Voluntary Remediation Program
Burwell.Caitlin@azdeq.gov
1110 W. Washington Street
Phoenix, AZ 85007; or,

AEI Consultants
Attention: Jacqueline Day
jday@aeiconsultants.com
2500 Camino Diablo
Walnut Creek, California 94597

Comments must be postmarked or received by ADEQ or AEI Consultants by **[INSERT MONTH AND DAY], 2020**.

Dated this [INSERT DAY] day of [INSERT MONTH], 2020

ADEQ will take reasonable measures to provide access to department services to individuals with limited ability to speak, write or understand English and/or to those with disabilities. Requests for language interpretation, ASL interpretation, CART captioning services or disability accommodations must be made at least 48 hours in advance by contacting Ian Bingham, Title VI Nondiscrimination Coordinator at 602-771-4322 or Bingham.Ian@azdeq.gov. Teleprinter services are available by calling 7-1-1 at least 48 hours in advance to make necessary arrangements.

ADEQ tomará las medidas razonables para proveer acceso a los servicios del departamento a personas con capacidad limitada para hablar, escribir o entender inglés y / o para personas con discapacidades. Las solicitudes de servicios de interpretación de idiomas, interpretación ASL, subtitulados de CART, o adaptaciones por discapacidad deben realizarse con al menos 48 horas de anticipación contactando a Ian Bingham, Coordinador de Anti-Discriminación del Título VI al 602-771-4322 o Bingham.Ian@azdeq.gov. Los servicios de teleimpresores están disponibles llamando al 7-1-1 con al menos 48 horas de anticipación para hacer los arreglos necesarios.

DRAFT