



GEOTEK CONTRACTING AND REMEDIATION, LLC
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June 24, 2020
Project No: 1631-PHC

Arizona Department of Environmental Quality
Remedial Projects Section, Voluntary Remediation Program
1110 West Washington Street, Mailcode 4415B-1
Phoenix, Arizona 85007

Attention: Joey Pace

Subject: **No Further Action Report**
Former Lippert Property
3401 East Grant Road
Tucson, Arizona
ADEQ Site Code: 513100-00

Dear Ms. Pace:

GeoTek Contracting and Remediation, LLC (GeoTek) is submitting this letter report addressing the ADEQ requirements for a No Further Action (NFA) report, to support a NFA determination from the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) without an encumbrance (e.g. environmental use restriction or activity and use limitation [AUL]) on the Site title for the Former Lippert Property located at 3401 East Grant Road in Tucson, Arizona, herein referred to as the Site in this report.

Requirement I: *A summary that adequately addresses the seven requirements listed in Arizona Revised Statutes (A.R.S.) § 49-181(A). All seven requirements must be addressed in writing. If a component is not applicable to the Site, state “not applicable” for that statutory requirement.*

The seven requirements listed in A.R.S. § 49-181(A) are discussed below.

A.R.S. § 49-181(A)(1): *A description of the specific contaminants for which a no further action determination is being sought.*

No Further Action is requested for Resource Conservation and Recovery Act (RCRA) Metals (arsenic, barium, cadmium, total chromium, lead, mercury, selenium, and silver).

A.R.S. § 49-181(A)(2): *A description of the actions taken to achieve remediation levels or controls determined in accordance with section 49-175, subsection B.*

Soil characterization activities were performed by Allwyn on the Site, prior to entrance into the VRP. In addition, GeoTek conducted an electromagnetic survey at the Site in 2018. These assessment activities were summarized in Section 2 of the Site Characterization Report and

Remedial Action Report and were detailed in the reports listed below (and provided in Appendix A of the Site Characterization Report and Remedial Action Report).

Phase I Environmental Site Assessment, Lippert Property, 3401 East Grant Road, Tucson, Arizona, Assessor's Parcel No. 111-07-0090; (Allwyn Project No. 0002-0145-05); Allwyn Consultants; March 23, 2017.

Phase II Environmental Site Assessment, Lippert Property, 3401 E. Grant Road, Tucson, Arizona, Assessor's Parcel No. 111-07-0090; (Allwyn Project No. 0002-0163); Allwyn Consultants; June 15, 2017.

Phase II Environmental Site Assessment Update, Lippert Property, 3401 East Grant Road, Tucson, Arizona, Assessor's Parcel No. 111-07-0090; (Allwyn Project No. 0002-0163); Allwyn Consultants; September 14, 2017.

Geophysical Electromagnetic Survey, Former Lippert Property, 3401 East Grant Road, Tucson, Arizona; (GeoTek Project No. 1631-PHC); GeoTek Contracting and Remediation, LLC; December 3, 2018.

Pertinent information related to remedial actions and assessment activities used to achieve remediation levels at the Site are summarized below.

Allwyn was retained on behalf of the City of Tucson to conduct a Phase II Environmental Site Assessment (ESA) at the Site to evaluate the recognized environmental conditions (RECs) identified during Allwyn's March 23, 2017 Phase I ESA related to historical automotive repair operations conducted at the Site. Soil samples were collected to assess the following: two in-ground hydraulic lifts; a used oil aboveground storage tank (AST) observed north of the Site building at the time of the Phase I ESA site reconnaissance that had subsequently been removed from the Site; a wastewater disposal sump in the southwestern automotive repair bay; near a former outdoor parts washer; an area of staining southwest of the storage shed; near the former location of two gasoline underground storage tanks (USTs); and in four exploratory borings to assess the impact of potential septic systems historically used on the Site. These borings were placed in probable areas of septic tanks. The results of these assessment activities were summarized in Allwyn's June 15, 2017 report titled *Phase II Environmental Site Assessment, Lippert Property, 3401 E. Grant Road, Tucson, Arizona, Assessor's Parcel No. 111-07-0090* (Allwyn Project No. 0002-0163).

Based on the analytical results, four samples from borings in suspect septic system areas (before the septic system was found at a different location on the Site) contained arsenic concentrations that exceeded the residential and non-residential soil remediation level (SRL) for arsenic of 10 milligrams per kilogram (mg/kg) at a depth of 10 feet below the ground surface (bgs) (Sample Nos. SS-1-10, SS-2-10, SS-3-10, and SS-4-10). Detected concentrations of arsenic did not exceed its minimum groundwater protection level (GPL) of 290 mg/kg.

In addition, two of the soil samples in the vicinity of the used oil AST collected and analyzed for lead contained a lead concentration which exceeded the minimum GPL for lead of 290 mg/kg (Sample Nos. SS-11-2 and SS-12-2), and one of these soil samples also contained a lead concentration which exceeded the residential SRL for lead of 400 mg/kg (Sample No SS-12-2). The lead concentrations detected in both of these soil samples were less than the non-residential SRL for lead of 800 mg/kg. Other metals detected above their laboratory reporting limits in the soil samples collected from Test Boring Nos. SS-10, SS-11, and SS-12 did not exceed their respective residential SRLs or minimum GPLs.

Based on the results of the June 2017 Phase II ESA, Allwyn recommended further assessment of the apparent lens of elevated arsenic concentrations at 10 feet bgs and further assessment to further define the vertical and lateral extent of potential lead impacts to the soil from the former used oil AST. Allwyn installed additional test borings and exploratory trenches and collected soil samples to further assess arsenic-impacted soil, assess the vertical and horizontal extent of lead-impacted soils near the former used oil AST at the Site; and assess additional potential locations of the former septic system and buried concrete and asphalt rubble found in an exploratory trench. The results of these assessment activities were summarized in Allwyn's September 14, 2017 report.

The results of the Allwyn September 2017 Phase II ESA indicated concentrations of arsenic exceeded its residential and non-residential SRL of 10 mg/kg in soil samples collected from four of the five test borings (Test Boring Nos. AS 1 through AS 4) at 10 feet bgs. In addition, one sample collected to assess the soil around the former AST had an arsenic concentration exceeding its residential and non-residential SRL of 10 mg/kg (Sample No. PB 1-10). Concentrations of total lead did not exceed the residential or non-residential SRLs or minimum GPL for lead in the soil samples collected at 10 feet bgs in the samples collected to further assess the former used oil AST.

Based on the results of the September 2017 Phase II ESA, Allwyn recommended additional assessment for arsenic at the Site and remediation of the lead associated with the former used oil AST.

A septic tank was not identified during the previous Phase II ESAs; however, a septic tank was later found west of the Site building during demolition of the building in August 2018. The septic tank was removed by the demolition contractor during demolition activities. In addition, two former aboveground hydraulic lifts were not assessed.

Based on a review of the Allwyn documents, GeoTek concluded additional assessment was needed of the former in-ground and aboveground hydraulic lifts, arsenic in the subsurface soil, and at a septic tank found during demolition activities to obtain an NFA for RCRA metals for the Site. In addition, remediation of lead-impacted soil associated with the former used oil AST would need to be completed.

GeoTek conducted additional assessment and remediation activities including evaluation of a septic tank area found during demolition of the Site building, additional assessment of four

hydraulic lifts previously located at the Site, and assessment of background concentrations of arsenic in subsurface soil. The results of the additional assessment and remediation activities were summarized in GeoTek's June 17, 2020 report titled *Site Characterization and Remedial Action Report, Former Lippert Property, Site Code: 513100-00, 3401 East Grant Road, Tucson, Arizona* (GeoTek Project No. 1631-PHC).

To remediate the lead-impacted soil, the soil in the vicinity of the former used oil AST was excavated to a depth of approximately 3 feet bgs. The final excavation was approximately 26 feet in length (east to west), 8.5 feet wide (north to south), and 3 feet deep. Following excavation of the lead-impacted soil associated with the former used oil AST, GeoTek collected post-remediation clearance samples from the excavation to verify soils with lead concentrations above the minimum GPL and residential SRL for lead have been effectively remediated. Following collection of the post-remediation clearance samples, the excavated area was backfilled using clean imported fill. The excavated soil was transported off the Site and disposed at the Marana Regional Landfill. The concentrations of total lead in the clearance soil samples ranged from 7.00 mg/kg to 28.1 mg/kg. These lead concentrations were well below the residential SRL for lead of 400 mg/kg and the minimum GPL for lead of 290 mg/kg. Based on the analytical results, GeoTek concluded the lead-impacted soil had been adequately remediated, and no further assessment or remediation was recommended at the used oil AST area.

For arsenic, GeoTek and the ADEQ conducted a statistical evaluation to compare background arsenic concentrations to arsenic concentrations in potential source areas. Based on the arsenic statistical evaluations, the arsenic concentrations in potential source areas and in background soil samples appear to be within the same population, and arsenic remediation is not necessary in the potential source areas.

Based on the work performed as part of GeoTek's additional assessment and remediation activities and previous assessments conducted by Allwyn, GeoTek concluded the RCRA metals barium, cadmium, total chromium, lead, mercury, selenium, and silver have been adequately defined below the ADEQ pre-determined 10^{-5} residential SRLs and the minimum GPLs. Based on the results of the background arsenic statistical evaluation, there appears to no significant difference between the arsenic results from the potential source areas on the Site and background samples. The ADEQ determined that the appropriate average remediation level (background SRL) for arsenic is 19.79 mg/kg based on the BCA Bootstrap 95% Upper Confidence Level. The average value for potential source area concentrations was 14.3 mg/kg. Therefore, the VRP found the arsenic values for potential source areas at the Site meet the background SRL for arsenic and considers arsenic to be properly characterized. Lastly, based on the results of the post-remediation soil sampling, GeoTek concluded the lead-impacted soil had been adequately remedied and no further assessment or remediation is recommended. As such, GeoTek concluded the Site qualifies for an NFA determination for RCRA metals.

A.R.S. § 49-181(A)(3): A description of any soil, water, or soil and water treatment systems used as part of the remediation.

Not Applicable – No treatment systems were used as part of remediation.

A.R.S. § 49-181(A)(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.

Not Applicable – No institutional or engineering controls have been installed or planned for the Site.

A.R.S. § 49-181(A)(5): If postremediation monitoring is proposed, a description of the type of monitoring, monitoring locations, contaminants to be monitored, monitoring frequency and sampling procedures.

Not applicable – Post-remediation monitoring is not required for the Site.

A.R.S. § 49-181(A)(6): A description of community involvement activities undertaken to meet the requirements of section 49-176.

As part of the community involvement requirements of ARS 49-173, GeoTek notified the surrounding community of the planned remediation activities by posting informational signs. The informational signs were posted near the Site boundary adjacent to East Grant Road and North Sparkman Boulevard. The signs were installed approximately 10 days prior to initiating remediation activities at the Site.

A.R.S. § 49-181(A)(7): A list of permits under this title obtained for the remedial action or held by the applicant pertaining to the site.

No permits were necessary for remediation activities at the Site.

Requirement 2: A general site location map underlain by a topographic base layer.

A general site location map is attached as Figure 1.

Requirement 3: A scaled map of the NFA boundary area (clearly defined and labeled). The NFA will only be applicable for the areas of the Site for which the characterization was completed.

A scaled map of the NFA boundary is attached as Figure 2.

Requirement 4: A digital NFA boundary map. Instructions for preparing the digital submittal are located on the ADEQ VRP website.

A digital NFA was emailed to Ms. Joey Pace, ADEQ VRP Project Manager on June 24, 2020.

**NO FURTHER ACTION REPORT
CITY OF TUCSON – EGS DEPARTMENT
FORMER LIPPERT PROPERTY (SITE CODE: 513100-00)
3401 EAST GRANT ROAD, TUCSON, ARIZONA**

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Requirement 5: A table of the contaminants for which the NFA is sought. Only contaminants for which characterization has been completed may be included.

No Further Action is requested for the following contaminants:

Resource Conservation and Recovery Act (RCRA) Metals	
Arsenic	Barium
Cadmium	Total Chromium
Lead	Mercury
Selenium	Silver

Requirement 6: A draft NFA Public Notice and the name of the newspaper where the notice will be published.

The draft NFA Public Notice is attached at Attachment A. The NFA Public Notice will be published one day in the Daily Territorial, a daily newspaper.

If you have any questions or comments, please call the undersigned at your convenience.

Sincerely,
GEOTEK CONTRACTING AND REMEDIATION, LLC


Holly Land
Senior Regulatory Specialist



Chet L. Pearson, P.E.
Principal Engineer

Attachments: Figure 1 – Site Location
Figure 2 – No Further Action Boundary Area
Attachment A – Draft NFA Public Notice

Distribution: (1) Addressee

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FIGURES

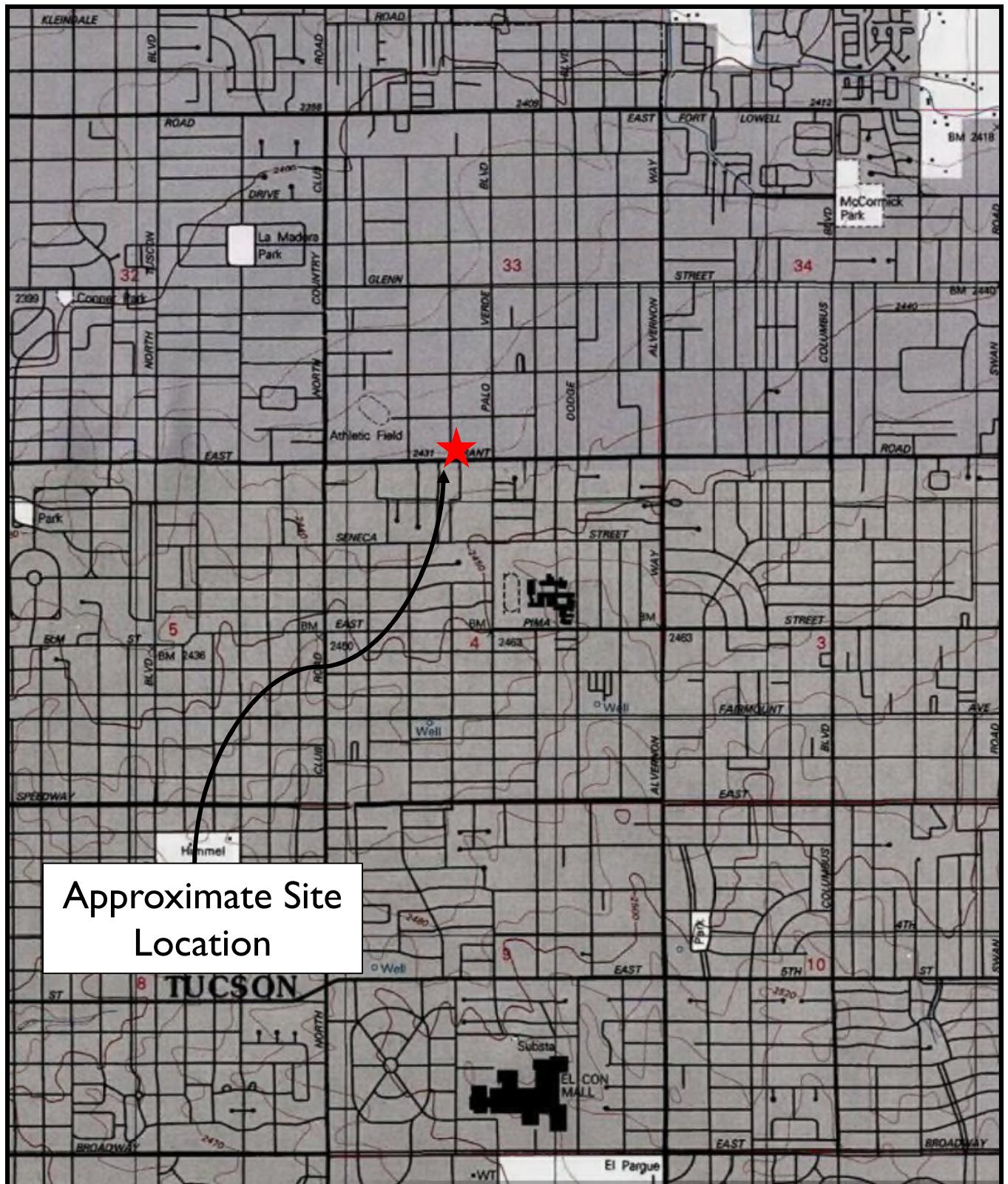


Figure I
Site Location Map

No Further Action Report

Former Lippert Property
3401 East Grant Road, Tucson, Arizona
Site Code: 513100-00

GeoTek Contracting and
Remediation, LLC
4050 East Cotton Center
Boulevard, Suite 49
Phoenix, Arizona 85040
<http://www.geotekusa.com/>

City of Tucson
Environmental &
General Services
Dept.
P.O. Box 27210
Tucson, AZ 85726



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Figure 2
NFA Boundary Map

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ATTACHMENT A

DRAFT NFA PUBLIC NOTICE

NOTICE OF 30-DAY PUBLIC COMMENT PERIOD
FORMER LIPPERT PROPERTY
VOLUNTARY REMEDIATION PROGRAM SITE
REQUEST FOR NO FURTHER ACTION DETERMINATION

The City of Tucson has submitted a request for a No Further Action (NFA) determination to the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) for the Former Lippert Property (the Site). The NFA Report requests closure for soil and was submitted in accordance with Arizona Revised Statutes § 49-181.

The Site consists of the property located at 3401 East Grant Road in Tucson, Arizona. Contaminants of concern at the Site are arsenic, barium, cadmium, total chromium, lead, mercury, selenium, and silver from former automobile repair 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 Former Lippert Property VRP site may do so to ADEQ, Attention: Joey Pace, Voluntary Remediation Program, 1110 W. Washington St., Phoenix, AZ 85007 or Pace.Joey@azdeq.gov; or Holly Land, GeoTek Contracting and Remediation, 4050 E. Cotton Center Blvd., Suite 49, Phoenix, AZ 85040 or Hland@geotekusa.com and reference this listing.

Comments must be postmarked or received by ADEQ or GeoTek Contracting and Remediation by July 30, 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 services or for disability accommodations must be made at least 48 hours in advance by contacting: 7-1-1 for TDD; (602) 771-2215 for Disability Accessibility; or Ian Bingham, Title VI Nondiscrimination Coordinator at (602) 771-4322 or bingham.ian@azdeq.gov.

ADEQ tomará medidas razonables para proveer acceso a los servicios del departamento para personas con capacidad limitada para hablar, escribir o entender Inglés y / o para las personas con discapacidad. Las solicitudes de servicios de interpretación del lenguaje o de alojamiento de discapacidad deben hacerse por lo menos 48 horas de antelación poniéndose en contacto con Ian Bingham, Title VI Nondiscrimination Coordinator al (602) 771-4322 o bingham.ian@azdeq.gov.

Dated this 30th day of June, 2020.