



February 7, 2018

WWFC 01-16-327-AZ (A-3)

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

RE: Request for a No Further Action Determination and NFA Report

Colonia Verde Shopping Center
7111-7189 East Tanque Verde Road
Tucson, AZ 85715
Site Code: 512819-00

Dear Ms. Osuch:

ADR Environmental Group, Inc. (ADR), in cooperation with Bender Environmental Consulting, Inc., has prepared this request for a determination of no further action (NFA) for the Colonia Verde Shopping Center. Pursuant to Arizona Revised Statutes (A.R.S.) § 49-181, section 49-175, subsection B, an applicant approved pursuant to section 49-174 may request the department to provide a determination that no further action is needed for a site or portion of a site by submitting a "NFA Report" to the department upon determining clean-up goals are achieved.

The NFA Report must include the following elements, which are set forth below:

1. *A description of the specific contaminants for which an NFA determination is being sought.*

The NFA determination is being sought for the dry-cleaning chemical tetrachloroethene (PCE) and any of its related daughter products, including Trichloroethene (TCE), 1,1-Dichloroethene (1,1-DCE), cis-1,2-Dichloroethene (cis-1,2-DCE), trans-1,2-Dichloroethene (trans-1,2-DCE) and Vinyl chloride.

2. *A description of the actions taken to achieve remediation levels or controls.*

Because the detected contaminant concentrations are sufficiently low (*i.e.*, below Arizona Department of Environmental Quality's (ADEQ) Soil Remediation Levels (SRLs) and Groundwater Protection Levels (GPLs)), no remedial actions were warranted.

3. *A description of any soil, water, or soil and water treatment systems used as part of the remediation.*

Because the detected contaminant concentrations are sufficiently low (*i.e.*, below ADEQ's SRLs and GPLs), no remedial treatment systems were warranted.

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.*

Because the detected contaminant concentrations are sufficiently low (i.e., below ADEQ's SRLs and GPLs), no engineering control or combination of engineering controls are warranted.

- 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.*

The proposed land use is to remain as currently developed (retail shopping center).

5. *If post-remediation monitoring is proposed, a description of the type of monitoring, monitoring locations, contaminants to be monitored, monitoring frequency and sampling procedures.*

Because the detected contaminant concentrations are sufficiently low (i.e., below ADEQ's SRLs and GPLs), no post-remediation monitoring is warranted.

6. *A description of community involvement activities.*

No community involvement activities are proposed

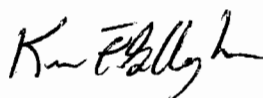
7. *A list of permits obtained for the remedial action or held by the applicant pertaining to the site.*

No permits were obtained for remedial action or are held by the applicant pertaining to the site.

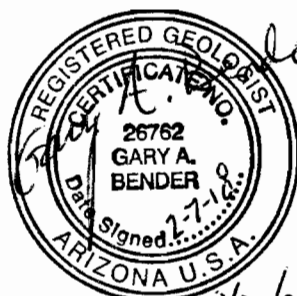
Please contact me at (916) 921-0600 or kgallagher@adreg.com with any questions or comments. Thank you.

Sincerely,

ADR ENVIRONMENTAL GROUP, INC.



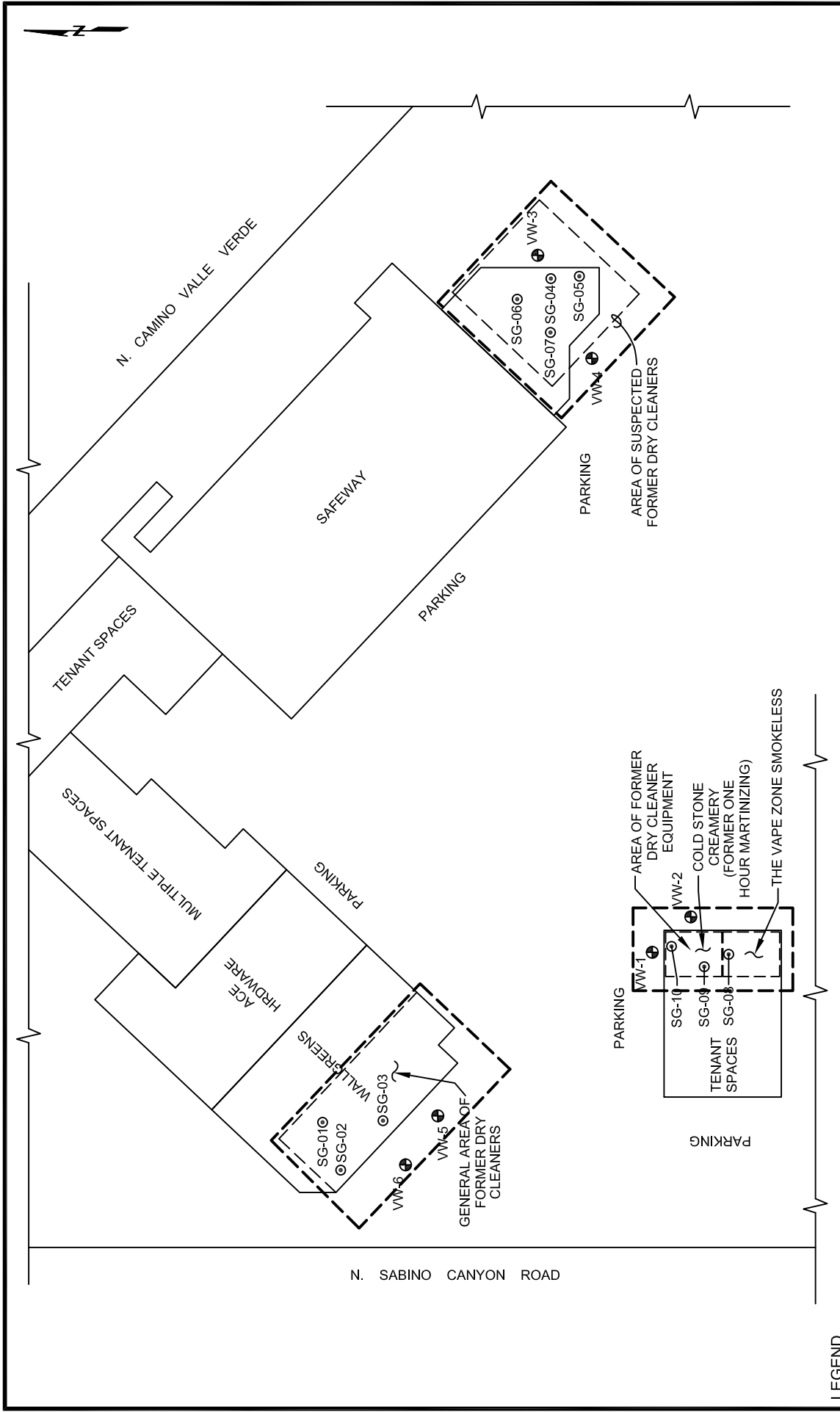
Kevin F. Gallagher
Project Manager



Expires 3/31/2020

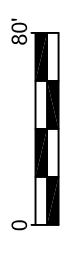
Gary Bender
Arizona Registered Geologist #26762

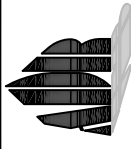
cc: Mr. Randy Banchik, Westwood Financial LLC
Mr. Keith Walker, Cox, Castle & Nicholson, LP



LEGEND

- - - Area of No Further Action (NFA) Determination
- SUB-SLAB BORING LOCATION BY ADR, JULY 2016
- ⊕ VAPOR WELL TO 40'





ADR Environmental Group, Inc.
Due Diligence and Risk Management
Services Nationwide
(888) 622-3734

NFA DETERMINATION LOCATION PLAN
Area of Former Dry Cleaners
7113, 7115, 7187 & 7189
E. Tanque Verde Rd., Tucson, Arizona

Project Number: WWFC 01-16-327-AZ (A-3) Date: March 2018 FIGURE: 1