

Voluntary Remediation Program

No Further Action Report / Conditional No Further Action Report

Upon achieving the remediation levels and controls determined pursuant to Arizona Revised Statutes (A.R.S.) § 49-175(B), a Volunteer may request ADEQ provide a determination that no further action is needed for a site or portion of a site by submitting this Report.

| | |
|-----------------------------|--|
| Site Name: | Former LA Cleaners |
| Site Code: | 514141-00 |
| Volunteer: | SAIA FAMILY LIMITED PARTNERSHIP |
| Report completed by: | Wilfrid M. Gill III, Gill Environmental, LLC |
| Date: | December 3, 2024 |
| | <input checked="" type="radio"/> No Further Action <input type="radio"/> Conditional No Further Action (a Declaration of Environmental Use Restriction is being placed on the Site) |

When completing this form, if additional space is needed, use extra box on Page 3.

1. A description of the specific contaminants for which a no further action determination is being sought. (List for each media.)

Please refer to Attachment C which includes Tables of contaminants detected in soil, soil vapor, and indoor air.

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

PCE from prior dry cleaning operations was discovered in soil and soil vapor at the Former LA Cleaners site suite during a Limited Phase II ESA completed in June 2020. The Former LA Cleaners is an individual east end-cap suite in the Countryside Specialty Shops shopping center. In August 2020, 800 cubic feet of soil was excavated from the source area and the soil was transported off-site and disposed at an approved disposal facility. Confirmation soil sampling of the bottom and sidewalls of the excavation confirmed that impacted soil was removed. The source area is inside the former LA Cleaners suite in the north-central portion of the suite where the former dry cleaning machine and chemical storage area were located.

Impacted soil vapor remained, concentrated around the source area, and a Sub-Slab Depressurization System (SSDS) was installed in October 2020. The site remained dormant until new tenant improvements for the Freely Taproom & Kitchen were completed in October 2021. The SSDS has been constantly operating since November 2021. Quarterly SSDS sampling from March 2022 through December 2023, and semi-annual SSDS sampling from December 2023 through current (last service June 2024), has documented a significant decrease in sub-slab PCE levels. PCE has not been detected above the laboratory detection limit in the SSDS effluent air since June 2023 and PCE has not been detected above the laboratory detection limit in the Former LA Cleaner's indoor ambient air since June 2022.

The Volunteer completed Site Characterization activities at the site property in May 2024 that consisted of drilling an angled soil boring beneath the site building and beneath the area of the former dry cleaning machine and chemical storage area. Soil vapor samples were collected at intervals between approximately 20 to 43 feet below ground surface. Calculations indicate that any remaining contaminants of concern in soil are at negligible concentrations below 0.00 mg/kg.

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

As stated above, a SSDS was installed at the Former LA Cleaners site in October 2020 and the SSDS was fully activated in November 2021. The SSDS has been running continuously since November 2021 with quarterly system sampling through December 2023 and now semi-annual system sampling from December 2023 onwards, with June 2024 being the most recent sampling service. The next semi-annual sampling service is scheduled for late December 2024.

The SSDS is documented in detail in GEI's October 21, 2020 Sub-Slab Depressurization System (SSDS) Installation Report. After SSDS installation, the site remained dormant for approximately 1 year and then GEI performed SSDS pilot testing and start-up procedures in November 2021 and the SSDS has been running continuously since November 2021. The pilot testing and start-up procedures are documented in GEI's November 29, 2021 Sub-Slab Depressurization (SSDS) Pilot Testing and Start-Up Report. All reports have been submitted to ADEQ VRP but GEI can immediately submit electronic copies of any or all reports upon request.

4. Whenever institutional or engineering controls are placed at the site:

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

Not applicable

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

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.

The sub-slab depressurization system (SSDS) has been operating at the Subject Property since November 2021. The SSDS has been inspected and the system effluent and indoor air in the tenant space was sampled on a quarterly basis through December 2023. The SSDS is now inspected and sampled on a semi-annual basis with the most recent event occurring in June 2024. The next semi-annual sampling service is scheduled for late December 2024. The Volunteer will continue to run and maintain the SSDS through 2025, and longer if needed, with semi-annual inspection and sampling to continue.

Note that the most recent June 2024 sampling event shows that the main contaminants of concern, PCE and TCE, have not been detected in the SSDS effluent since June 2023 with documented non-detect results in September and December 2023 and June 2024. Indoor ambient air within the former LA Cleaners tenant suite has not contained a detectable concentration of PCE since a minor detection at 3.47 micrograms per cubic meter in June 2022. Indoor air sampling has documented non-detect PCE results in September and December 2022; March, June, September, and December 2023; and June 2024. The indoor air has not contained detectable TCE in any of the samples collected.

6. A description of community involvement activities undertaken to meet the requirements of A.R.S. § 49-176.

GEI distributed a "Notice of Environmental Sampling Field Work" flyer on May 9, 2024 to the 19 on-property tenant suites at the Countryside Specialty Shops. Bill Gill with GEI personally distributed the flyers and answered any questions that the tenants had regarding the former dry cleaner, the VRP, and the work to be performed. The Former LA Cleaners is one suite at the Countryside Specialty Shops shopping center. The flyer was sent in draft form to ADEQ VRP on April 30, 2024, and the flyer was approved by ADEQ VRP without any revisions required.

GEI will also assist the Volunteer in publishing an ADEQ Public Notice form notifying the public of the VRP Site request for No Further Action in a newspaper of general circulation and we will also distribute a new flyer consisting of the same Public Notice to all Countryside Specialty Shops tenants. A copy of the Public Notice to be published and distributed is included in Attachment B. The Public Notice is scheduled to appear in The Record Reporter (Phoenix) on December 6 and 9, 2024. This same Public Notice will be distributed to Site tenants on December 6, 2024.

7. A list of permits under this title obtained for the remedial action or held by the Volunteer pertaining to the Site.

Not applicable

Please attach the following to this report:

- A map of scaled, clearly defined, and labeled NFA/CNFA boundary/ies.
- A draft NFA/CNFA public notice.
- A list of stakeholders who have been identified to receive direct notice of the NFA/CNFA public comment period, if necessary.

Use the following space to provide additional information:

Please refer to Attachment A, Figure 1, Site Location Map and Figure 2, Proposed NFA Boundary.

Please refer also to Attachment B, NFA Public Notice.

Please refer also to Attachment C which includes Tables of contaminants detected in soil, soil vapor, and indoor air.

The proposed stakeholders will be the same tenants (approximately 19 tenants) of the Countryside Specialty Shops shopping center in which the Former LA Cleaners is located.

Attachment A

Figure 1, Site Location Map

Figure 2, Proposed NFA Boundary

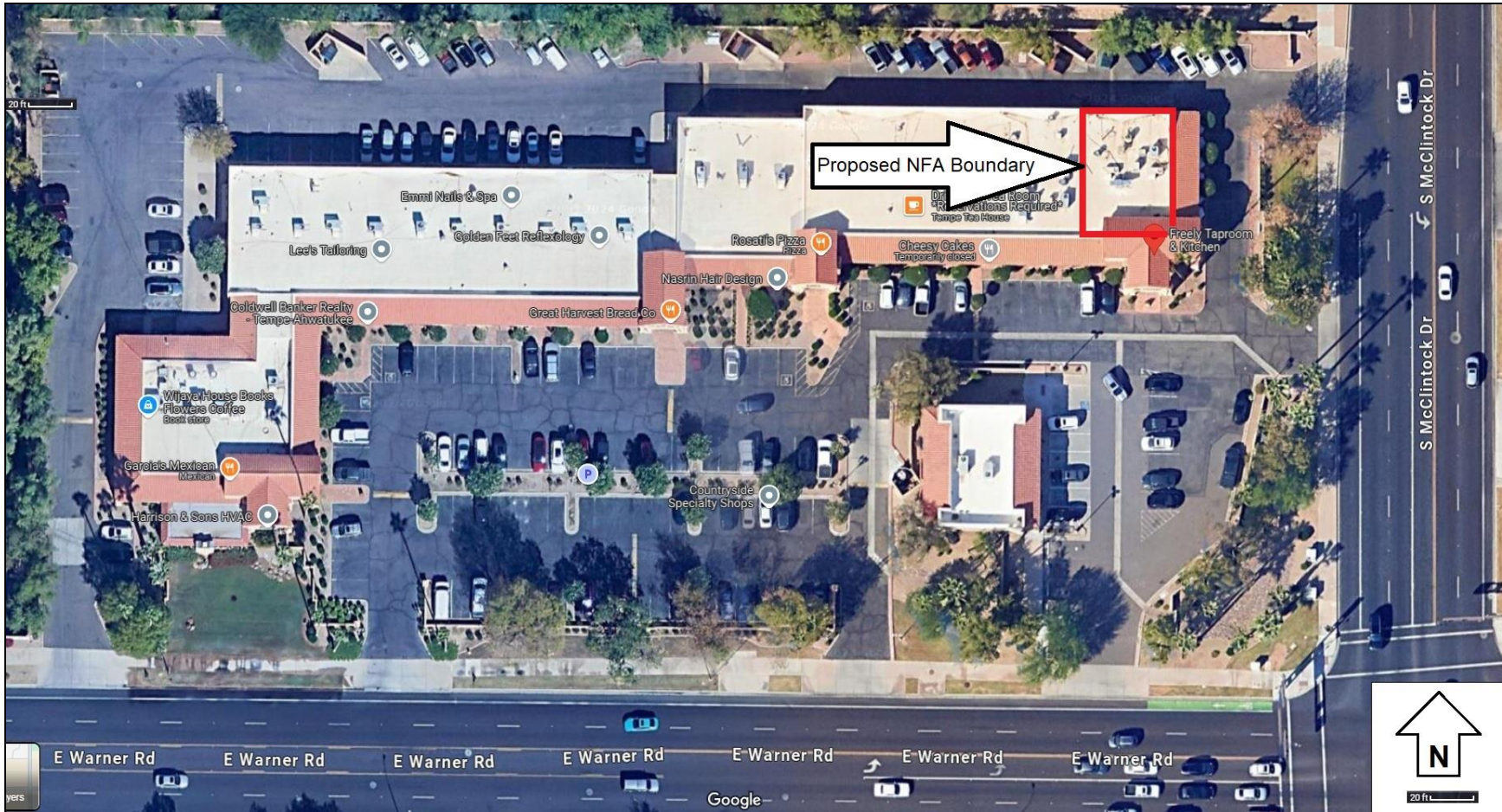


Figure 1, Site Location Map

The proposed NFA location is the former LA Cleaners, 1730 E Warner Road, Suite 11, Tempe, Arizona 85284. Suite 11 within the Countryside Specialty Shops shopping center is delineated above by the red box.



Figure 2, Proposed NFA Boundary

The former LA Cleaners Suite 11 is now occupied by Freely Taproom & Kitchen, delineated above by the red box.

Attachment B

**NOTICE OF 30-DAY PUBLIC COMMENT PERIOD
FORMER LA CLEANERS
VOLUNTARY REMEDIATION PROGRAM SITE
REQUEST FOR NO FURTHER ACTION DETERMINATION**



**NOTICE OF 30-DAY PUBLIC COMMENT PERIOD
FORMER LA CLEANERS
VOLUNTARY REMEDIATION PROGRAM SITE
REQUEST FOR NO FURTHER ACTION DETERMINATION**

The Saia Family Limited Partnership 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 LA Cleaners VRP site. The NFA requests closure for soil and was submitted in accordance with Arizona Revised Statutes § 49-181.

The Former LA Cleaners VRP site consists of a former dry cleaner located in a shopping center in Tempe, Arizona. Contaminants of concern at the site are Volatile Organic Compounds (VOCs) in soil, soil vapor, and indoor air.

The NFA Report is available online at: azdeq.gov/PublicNotices, and at the ADEQ Records Center, 1110 W. Washington St., Phoenix, (602) 771-4380 or (800) 234-5677, or azdeq.gov/Records.

PARTIES WISHING TO SUBMIT WRITTEN COMMENTS regarding the NFA request for the Former LA Cleaners VRP site may do so to ADEQ, Attention: Nichole Osuch, Voluntary Remediation Program, 1110 W. Washington St., Phoenix, AZ 85007 or osuch.nichole@azdeq.gov and reference this listing. **Comments must be postmarked or received by ADEQ by Monday, January 6, 2025**

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 translation, ASL interpretation, CART captioning services or disability accommodations must be made at least 48 hours in advance by contacting the Title VI Nondiscrimination Coordinator, Leonard Drago, at 602-771-2288 or Drago.Leonard@azdeq.gov. For a TTY or other device, Telecommunications Relay Services are available by calling 711.

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 traducción de idiomas, interpretación ASL (lengua de signos americano), subtítulo de CART, o adaptaciones por discapacidad deben realizarse con al menos 48 horas de anticipación comunicándose con el Coordinador de Anti-Discriminación del Título VI, Leonard Drago, al 602-771-2288 o Drago.Leonard@azdeq.gov. Para un TTY u otro dispositivo, los servicios de retransmisión de telecomunicaciones están disponible llamando al 711.

Dated this 5th day of December, 2024.

Attachment C

Tables of contaminants detected in Soil, Soil Vapor, and Indoor Air

Soil Samples Collected June 19, 2020 and Analyzed for Volatile Organic Compounds by Method SW846 8260C

| Sample Identification: | SB1 @ 10' | SB2 @ 10' | SB3 @ 3' | SB4 @ 3' | SB5 @ 3' | SB6 @ 3' |
|-------------------------------|--------------------|-------------------------|------------------------------|-----------------------------|------------------------------|-----------------------------|
| Sample Location: | North Alley | East Drive Aisle | North Side of Machine | East Side of Machine | South Side of Machine | West Side of Machine |
| Units: | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg | mg/kg |
| Tetrachloroethylene | 2.32 | ND (0.22) | 45.2 | 28.2 | 13.8 | 6.33 |
| Toluene | ND (0.28) | ND (0.22) | 0.3 | 0.332 | 0.396 | ND (0.20) |
| Trichloroethylene | ND (0.28) | ND (0.22) | ND (0.22) | ND (0.28) | ND (0.24) | ND (0.20) |
| Trichlorofluoromethane | ND (0.28) | ND (0.22) | ND (0.22) | ND (0.28) | ND (0.24) | ND (0.20) |
| Vinyl chloride | ND (0.28) | ND (0.22) | ND (0.22) | ND (0.28) | ND (0.24) | ND (0.20) |
| Xylene (total) | ND (0.28) | ND (0.22) | ND (0.22) | ND (0.28) | ND (0.24) | ND (0.20) |

Footnotes:

mg/kg = milligrams per kilogram

ND = not detected above Laboratory Reported Detection Limit or RDL

Soil Vapor Samples Collected June 19, 2020 and Analyzed for Volatile Organic Compounds by Method TO-15

| Sample Identification: | SV1@5' | SV2@5' | SV3@6" | SV4@6" | SV5@6" | SV6@6" |
|--|-------------------------|-------------------------|------------------------------|-----------------------------|------------------------------|-----------------------------|
| Sample Location: | North Alley | East Drive Aisle | North Side of Machine | East Side of Machine | South Side of Machine | West Side of Machine |
| Units: | µg/m³ | µg/m³ | µg/m³ | µg/m³ | µg/m³ | µg/m³ |
| Acetone | ND | 236 | 68,400 | 89,600 | 75,100 | 54,700 |
| 1,3-Butadiene | ND | 29.4 | ND | ND | ND | ND |
| Chloroform | ND | 18.4 | ND | ND | 18,900 | ND |
| Chloromethane | ND | 1.99 | ND | ND | ND | ND |
| Ethanol | ND | 112 | 28,800 | 26,400 | 24,500 | 25,800 |
| Ethylbenzene | ND | 9.36 | ND | ND | ND | ND |
| 4-Ethyltoluene | ND | 7.85 | ND | ND | ND | ND |
| Dichlorodifluoromethane | ND | 3.67 | ND | ND | ND | ND |
| 1,1-Difluoroethane | 1,290 | 44.6 | 33,000 | 30,300 | 27,600 | 23,100 |
| Heptane | ND | 11 | ND | ND | ND | ND |
| n-Hexane | 5,150 | 22 | 49,700 | 44,800 | 46,500 | 33,800 |
| Methyl Butyl Ketone | ND | 36.0 | ND | ND | ND | ND |
| 2-Butanone (MEK) | ND | 76.1 | ND | ND | ND | ND |
| 4-Methyl-2-pentanone (MIBK) | ND | 127 | ND | ND | ND | ND |
| Methyl methacrylate | ND | 2.17 | ND | ND | ND | ND |
| MTBE | ND | 15.3 | ND | ND | ND | ND |
| Naphthalene | ND | 5.76 | ND | ND | ND | ND |
| 2-Propanol | ND | 48.2 | 263,000 | 356,000 | 293,000 | 218,000 |
| Propene | ND | 122 | ND | ND | ND | ND |
| Styrene | ND | 10.3 | ND | ND | ND | ND |
| Tetrachloroethylene (PCE) | 16,600,000 | 577 | 91,700,000 | 292,000,000 | 128,000,000 | 41,800,000 |
| Toluene | 1,970 | 75.3 | ND | ND | ND | ND |
| Trichloroethylene (TCE) | 2,660 | ND | 18,800 | 21,100 | 32,700 | 8,950 |
| Trichlorofluoromethane | ND | 2.09 | ND | ND | ND | ND |
| 1,2,4-Trimethylbenzene | ND | 8.59 | ND | ND | ND | ND |
| 1,3,5-Trimethylbenzene | ND | 2.17 | ND | ND | ND | ND |
| 2,2,4-Trimethylpentane | 2,480 | ND | ND | ND | ND | ND |
| m&p-Xylene | ND | 23.3 | ND | ND | ND | ND |
| o-Xylene | ND | 9.54 | ND | ND | ND | ND |
| Footnotes: | | | | | | |
| ug/M ³ : micrograms per cubic meter | | | | | | |
| ND = not detected above Laboratory Reported Detection Limit or RDL | | | | | | |

| VOLATILE ORGANIC COMPOUNDS IN INDOOR AIR by Method TO-15 | | | | | | | | | | | EPA Regional Screening Levels (RSL) Composite Worker Air Carcinogenic Target Risk=1E-06 updated May 2024 |
|--|----------------------------|---|--|---|--|---|---|---|--|---|--|
| Sample Description: | LA Cleaners Pre-Mitigation | LA Cleaners First Quarterly O&M Service | LA Cleaners Second Quarterly O&M Service | LA Cleaners Third Quarterly O&M Service | LA Cleaners Fourth Quarterly O&M Service | LA Cleaners Fifth Quarterly O&M Service | LA Cleaners Sixth Quarterly O&M Service | LA Cleaners Seventh Quarterly O&M Service | LA Cleaners Eighth Quarterly O&M Service | LA Cleaners First Semi-Annual O&M Service | |
| Sample Identification: | LA-Indoor 1 | LA Indoor 3/5/22 | LA Cleaners Indoor | LA Cleaners Indoor 9/15/22 | LA Cleaners Indoor 12/13/22 | LA Cleaners Indoor 3/16/23 | LA Cleaners Indoor 6/22/23 | LA Cleaners Indoor 9/28/23 | LA Cleaners Indoor 12/11/23 | LA Indoor - 6/20/24 | |
| Collection Date: | 8/2/2020 | 3/5/2022 | 6/17/2022 | 9/15/2022 | 12/13/2022 | 3/16/2023 | 6/22/2023 | 9/28/2023 | 12/11/2023 | 6/20/2024 | |
| Units: | µg/m ³ | µg/m ³ | µg/m ³ | µg/m ³ | µg/m ³ | µg/m ³ | µg/m ³ | µg/m ³ | µg/m ³ | µg/m ³ | |
| Acetone | 34.7 | 18.9 | 27.1 | 28.4 | 26.9 | 53.8 | 29.1 | 61.2 | 58.4 | 43.5 | |
| 2-Butanone (MEK) | ND | ND | ND | ND | ND | ND | ND | ND | 19.3 | ND | |
| Chloroform | ND | 3.85 | 6.08 | 8.05 | ND | 7.03 | 10.4 | 5.81 | 4.78 | ND | |
| Chloromethane | 1.95 | 1.34 | 1.59 | ND | ND | ND | ND | ND | ND | ND | |
| Cyclohexane | 1.13 | 1.22 | ND | ND | ND | ND | ND | ND | 5.61 | ND | |
| 1,1-Difluoroethane | ND | 35.9 | ND | ND | ND | ND | ND | ND | ND | ND | |
| Ethanol | 77.5 | 3300 | 3850 | 8330 | 6390 | 808 | 17,400 | 18,100 | 5,470 | 18,000 | |
| Ethyl acetate | ND | 17.2 | 13.2 | 9.86 | 10.8 | 20.9 | 21.7 | 25.7 | 13.0 | 22.2 | |
| Ethylbenzene | 1.57 | ND | ND | ND | ND | ND | ND | ND | ND | ND | |
| Trichlorofluoromethane | 1.40 | 5.04 | 3.25 | 3.48 | 3.48 | 3.93 | ND | 2.92 | ND | ND | |
| Dichlorodifluoromethane | 2.43 | 2.25 | 1.70 | ND | ND | ND | ND | ND | ND | ND | |
| Methylene Chloride | ND | 0.858 | ND | ND | ND | ND | ND | ND | ND | ND | |
| Nonane | ND | 19.5 | ND | ND | ND | ND | ND | ND | ND | ND | |
| 2-Propanol | 14.6 | 70.8 | 15.9 | ND | 50.7 | 191 | 69.3 | ND | 85.0 | ND | |
| Styrene | 1.08 | 0.910 | 0.893 | ND | ND | ND | ND | ND | ND | ND | |
| Tetrachloroethylene (PCE) | 1,110 | ND | 3.47 | ND | ND | ND | ND | ND | ND (-6.78) | ND (-6.78) | |
| Toluene | 1.26 | ND | ND | ND | ND | ND | ND | ND | ND | ND | |
| Trichloroethylene (TCE) | ND | ND | ND | ND | ND | ND | ND | ND | ND (-2.69) | ND (-2.69) | |
| Trichlorofluoromethane | 1.40 | 5.04 | 3.25 | 3.48 | 3.48 | 3.93 | ND | 2.92 | ND | ND | |
| m&p-Xylene | 5.42 | ND | ND | ND | ND | ND | ND | ND | ND | ND | |
| o-Xylene | 1.69 | ND | ND | ND | ND | ND | ND | ND | ND | ND | |

Footnotes:
µg/m³ = micrograms per cubic meter
ND = not detected above laboratory reported detection limit
NE = not established
Boldfaced cells indicate the primary contaminants of concern. PCE and TCE