



AECOM  
7720 North 16<sup>th</sup> Street, Suite 100  
Phoenix, AZ 85020

(602) 371-1100 telephone  
(602) 371-1615 fax

June 18, 2019

Nichole Osuch, PMP  
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  
Former Manganese Ore Site  
City of Phoenix Parcel No. 308-06-005C  
Wenden, La Paz County, Arizona  
VRP Site Code: 512733-00

Dear Ms. Osuch,

AECOM Technical Services, Inc. (AECOM) submits this letter on behalf of the City of Phoenix (City) to the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) to request a No Further Action (NFA) determination for the former manganese ore site located northeast of Santa Fe Avenue and 5<sup>th</sup> Street in Wenden, La Paz County, Arizona (the "Site"). A map showing the NFA boundary is included as Attachment A. This letter provides specific information that is required in a request for a determination pursuant to Arizona Revised Statutes (A.R.S.) § 49-181.

Between May 2017 and August 2018, under the direction of the City, AECOM prepared a Remedial Action Plan (RAP) and performed the required excavation oversight and soil sampling activities at the Site. The associated community involvement activities, permits, remedial actions and confirmation soil sampling and testing performed at the Site were detailed in the report titled, "No Further Action (NFA) Report, Former Manganese Ore Site, Wenden, La Paz County, Arizona, Parcel Number: 308-06-005C, ADEQ VRP Site Code: 512733-00," dated January 17, 2019, and the Response to Review of No Further Action Report dated March 19, 2019. In addition, the City provided a letter clarifying the scope changes that occurred based on field data collected during the remediation project. This information was summarized in a letter titled, "Scope change during field work, City of Phoenix Parcel No. 308-06-005C, Wenden, Arizona, Site Code 512733-00," dated May 22, 2019. The ADEQ VRP provided approval of these reports in a letter to the City dated May 31, 2019.

Based on the information summarized in the NFA report and further clarified in the scope change letter, AECOM and the City concluded that there are multiple lines of evidence that indicate that the full extent of the McMullen VRP site has been remediated to residential standards.

The seven items of information required for an NFA determination are summarized below and further discussed in the NFA report.

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

Contaminants of concern in soils at the Site included the metals arsenic, lead, manganese and thallium.

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

Based on the visual nature of the contamination, impacted soils were excavated, stockpiled on the Site pending laboratory analysis for waste characterization verification purposes, and removed from the Site for proper disposal as non-hazardous waste.

AECOM collected a total of 358 soil confirmation samples; 219 from the walls and 139 from the floors. No lead, manganese or thallium was detected at concentrations above the applicable residential soil remediation levels (SRLs) in confirmation soil samples collected. There were nine discreet wall samples across the Site that exceeded the residential SRL for arsenic, ranging from 10.4 milligrams per kilogram (mg/kg) to 19.3 mg/kg. For these areas, the results of at least eight wall samples within each decision unit were used to calculate the 95 percent upper confidence limit (UCL) using ProUCL. The ProUCL values ranged between 6.595 mg/kg and 9.496 mg/kg, all of which were below the residential SRL of 10 mg/kg.

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

No treatment systems were used as a part of the remediation.

**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.*

No institutional or engineering controls will be placed on the Site.

**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.***

No post-remediation monitoring is proposed for the Site.

**6. *A description of community involvement activities.***

Prior to the start of field activities, public notices (in English and Spanish) were prepared notifying residences of planned activities, including the estimated dates of field work, contaminants of concern, a brief description of the history of the Site and planned activities, and contact information for the ADEQ and City project managers. In addition, signs, in English and Spanish, were posted at the road entrance to the Site listing the project name, ADEQ VRP number, contaminants of concern, and City and ADEQ VRP project managers' contact information.

As part of the request for NFA, a public notice summarizing remedial activities completed at the Site has been prepared and is included as Attachment B.

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

Prior to field activities, the following permits were obtained: Arizona Department of Agriculture (ADA) Notice of Intent to Clear Land; Arizona Pollutant Discharge Elimination System (AZPDES) Construction General Permit (CGP); and La Paz County Department of Community Development grading, grubbing and removal permits.

Upon acceptance by ADEQ of this request for an NFA determination, the public notice will be submitted to a local newspaper for publication and public comment, and/or posted in a public place in Wenden.

Please feel free to contact us if you have any questions at (602) 371-1100 or [Janet.Workman@aecom.com](mailto:Janet.Workman@aecom.com) or [Marianne.Burrus@aecom.com](mailto:Marianne.Burrus@aecom.com).

Sincerely,



Marianne Burrus  
Project Manager



Janet M. Workman, P.E.  
Project Engineer

Attachment A: NFA Boundaries Map  
Attachment B: Public Notice

**ATTACHMENT A**  
**NFA BOUNDARIES MAP**





Imagery Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS,  
USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Legend**  
■ Subject Property  
■ NFA Boundary

NFA BOUNDARIES MAP  
MCMULLEN VALLEY FORMER MANGANESE ORE SITE  
LA PAZ COUNTY, ARIZONA

0 50 100  
Feet

N

June 2019 **AECOM**



**ATTACHMENT B**  
**PUBLIC NOTICE**

**NOTICE OF 30-DAY PUBLIC COMMENT PERIOD  
MCMULLEN FORMER MANGANESE ORE SITE  
CITY OF PHOENIX PARCEL NO. 308-06-005C  
VOLUNTARY REMEDIATION PROGRAM SITE  
REQUEST FOR NO FURTHER ACTION DETERMINATION**

The City of Phoenix 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 McMullen Former Manganese Ore Site VRP site. The NFA requests closure for soil and was submitted in accordance with Arizona Revised Statutes § 49-181.

The McMullen Former Manganese Ore Site VRP site consists of an approximately 40.4-acre area of vacant land that was formerly used for manganese ore processing located northeast of Santa Fe Avenue and 5<sup>th</sup> Street in Wenden, La Paz County, Arizona. Contaminants of concern at the site are the metals arsenic, lead, manganese and thallium in soils.

The NFA Report and the VRP file are available for review 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 McMullen Former Manganese Ore Site VRP site may do so to ADEQ, Attention: Ms. Nichole Osuch, Voluntary Remediation Program, 1110 W. Washington St., Phoenix, AZ 85007 or [Osuch.Nichole@azdeq.gov](mailto:Osuch.Nichole@azdeq.gov); or Ms. Elizabeth Zima at the City of Phoenix, Office of Environmental Programs, 200 West Washington Street, 14th Floor, Phoenix, AZ 85003 or [Elizabeth.Zima@phoenix.gov](mailto:Elizabeth.Zima@phoenix.gov) and reference this listing. **Comments must be postmarked or received by ADEQ or the City of Phoenix by [day of week] [date], [year].**

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 [idb@azdeq.gov](mailto:idb@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 [idb@azdeq.gov](mailto:idb@azdeq.gov).

Dated this [date] day of [month], [year].