

March 28, 2018

Arizona Department of Environmental Quality
Remedial Projects Section, Voluntary Remediation Program
Attn: Ms. Joey Pace
1110 West Washington Street, Mailcode 4415B-1
Phoenix, Arizona 85007

Re: No Further Action Report
Former AutoNation Dealership
145 East Main Street
Mesa, Maricopa County, Arizona
ADEQ Site Code: 512938-00

Dear Ms. Pace:

Allwyn Consultants (Allwyn) is submitting this letter report addressing the requirements outlined March 8, 2018 letter titled *Approval of Site Characterization Report*, to support a No Further Action (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 Property title for the Former AutoNation Dealership facility located at 145 East Main Street in Mesa, Arizona, herein referred to as the Property in this report.

Requirement 1: *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 Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), including Polynuclear Aromatic Hydrocarbons (PAHs), Resource Conservation and Recovery Act (RCRA) Metals (arsenic, barium, cadmium, total chromium, lead, mercury, selenium, and silver), and Polychlorinated Biphenyls (PCBs).

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 URS Corporation (URS) and Allwyn Environmental on the Property, prior to entrance into the VRP. In addition, URS performed remedial activities of PAH-impacted soils associated with two of the borings installed in an area where some of the Property's aboveground storage tanks (ASTs) were staged (Test Borings AST-2 and AST-6). These assessment and

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remedial activities were summarized in Section 2 of the Site Characterization Report (SCR) and were detailed in the reports listed below (and provided in Appendix A of the SCR).

Phase I Environmental Site Assessment, AutoNation Chevrolet-Parking Garage, 145 East Main Street, Mesa, Maricopa County, Arizona; URS Corporation; August 7, 2014.

Limited Phase II Environmental Site Assessment, Former AutoNation Chevrolet, 145 East Main Street, Mesa, Maricopa County, Arizona; URS Corporation; URS Job No. 38620026; December 10, 2014.

Removal and Disposal of Petroleum-Impacted Soil, Former AutoNation Brown & Brown Chevrolet Site, 145 East Main Street, Mesa, AZ; URS Corporation; December 3, 2015.

Draft Phase I Environmental Site Assessment, AutoNation Chevrolet Mesa Dealership, 145 E. Main Street, Mesa, Arizona; Allwyn Environmental; December 1, 2015.

Phase II Environmental Site Assessment, AutoNation Chevrolet Mesa Dealership, 145 East Main Street, Mesa, Arizona; Allwyn Environmental; December 3, 2015.

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

URS performed a Phase II ESA at the Property in 2014 and summarized the findings in the URS December 10, 2014 report titled *Limited Phase II Environmental Site Assessment, Former AutoNation Chevrolet, 145 East Main Street, Mesa, Maricopa County, Arizona*. URS installed 46 test borings in the vicinity of the 34 former and current underground hydraulic lifts (UHLs), two oil-water separators (OWSs), and the Property ASTs. Based on the analytical results, several PAHs were detected above their respective ADEQ pre-determined 10^{-5} residential and/or non-residential soil remediation levels (SRLs) and/or minimum groundwater protection levels (GPLs) in soil samples associated with two of the borings installed in an area where some of the Property's ASTs were staged (Test Borings AST-2 and AST-6). In addition, arsenic was detected in five soil samples obtained from the test borings installed in the vicinity of the ASTs at concentrations above 10 milligrams per kilogram (mg/kg), the residential and non-residential SRL for arsenic.

URS performed remedial activities of the PAH-impacted soils around Test Borings AST-2 and AST-6 in October 2015. Remedial activities were summarized in URS December 3, 2015 report titled *Removal and Disposal of Petroleum-Impacted Soil, Former AutoNation Brown & Brown Chevrolet Site, 145 East Main Street, Mesa, AZ*. Remediation activities consisted of removing the surface cover from an area of approximately five feet by five feet, and soil was excavated in the vicinity of both Test Boring AST-2 and AST-6 locations to a depth of approximately six feet below ground surface (bgs). The approximately 11 cubic yards of excavated soil was transported and disposed off the Property. Five soil samples were collected from each excavation (one composite sample consisting of four subsamples from each sidewall and one discrete soil sample from the bottom). The ten soil samples were analyzed for PAHs using EPA Method 8270C SIM. Analytical results for these soil samples indicated no PAHs were present above their respective residential SRLs or minimum GPLs. Each excavation was then backfilled with clean, imported fill.

Allwyn Environmental was contracted by Sunbelt to conduct a Limited Phase II ESA to further assess soils in four general areas: (1) UHLs; (2) the area of the former OWS in Building 3 (the northern OWS) and the former OWS adjacent to Building 6 (the southern OWS); (3) areas Allwyn Environmental concluded additional assessment should be performed to confirm no environmental impact to the Property; and (4) areas of the catch basins located down gradient of the Property paint booths with respect to surface gradients. The results of these assessment activities were summarized in Allwyn Environmental's December 3, 2015 report titled *Phase II Environmental Site Assessment, AutoNation Chevrolet Mesa Dealership, 145 East Main Street, Mesa, Arizona*.

Based on the analytical results, six samples contained arsenic concentrations that exceeded the residential and non-residential SRL for arsenic of 10 mg/kg (Sample Nos. B-1-2, B-3-5, B-3-10, B-9-2, B-11-2, and HL-7-10). Detected concentrations of arsenic did not exceed its minimum GPL of 290 mg/kg.

Based on the results of the previous site characterization activities conducted on the Property, other than the OWS located in Building 7 and staining found after the removal of two utility-owned oil-filled transformers located north of Building 8, Allwyn concluded the Property had been adequately assessed for impact from historical activities for the following COCs: VOCs, SVOCs, PCBs, and the RCRA Metals barium, cadmium, chromium, lead, mercury, selenium, and silver in the areas previously assessed.

Allwyn also concluded additional investigation for arsenic was required. In addition, based on field observations of the Property after the emptying of buildings for demolition and removal of pad-mounted electrical transformers. Allwyn performed additional investigation of the OWS located in Building 7 and the staining located where the transformers had been located. In addition, additional soil assessment was performed in areas not previously assessed to support the request for a NFA determination for Property-wide soil for the constituents of concern. The results from the background arsenic assessment, additional soil assessment activities, and a description of previous assessment results were summarized in Allwyn's SCR dated February 9, 2018 titled *Site Characterization Report, Sunbelt AN, LLC, Former AutoNation Dealership - Site Code: 512938-00*.

Based on the work performed as Allwyn's additional Site characterization and previous assessments conducted by Allwyn and others, Allwyn concluded Property COCs except for arsenic have been adequately defined below the ADEQ pre-determined 10^{-5} residential SRLs and the minimum GPLs. In addition, the ADEQ VRP stated that PCB concentrations will need to meet the residential non-carcinogen SRL of 1.1 mg/kg for total PCBs to meet the requirements of the Soil Rule and thereby qualify for No Further Action for PCBs. PCBs were not detected above laboratory MRLs and the laboratory MRLs were less than the ADEQ pre-determined 10^{-6} SRL of 0.25 mg/kg and residential non-carcinogen SRL of 1.1 mg/kg for total PCBs. Based on the PCB results for the additional assessment area samples and transformer assessment samples, Allwyn concluded that the Property qualifies for No Further Action for PCBs. Lastly, based on the results of the background arsenic assessment, there were no significant difference between the arsenic results from the potential source areas and background arsenic samples. Therefore, Allwyn concluded remediation is not necessary in the potential source areas for arsenic.

As discussed in the March 8, 2018 letter from the ADEQ VRP approving the SCR, Sunbelt has characterized semi-volatile organic compounds (SVOCs) to below the applicable 10^{-5} residential SRLs and the minimum GPLs. However, the SVOCs benzidine, n-nitrosodimethylamine, and n-nitrosodi-n-

propylamine were reported as not detected in the samples collected, however the laboratory reporting limits (RLs) for these compounds exceeded their respective 10^{-5} residential SRLs and therefore cannot be included in a NFA determination. However, the VRP has no evidence to suggest these compounds are present at the Property, given there are no exceedances of any other SVOCs. As such, benzidine, n-nitrosodimethylamine, and n-nitrosodi-n-propylamine have not been included in this request for a NFA determination at the Property.

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 Property.

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 Property.

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, Sunbelt notified the surrounding community of the site characterization and potential remediation activities by posting informational signs. The informational signs were posted near the Property boundary adjacent to Main Street, 1st Avenue, Serrine, and Hibbert. The signs were installed prior to performing assessment activities conducted by Allwyn in 2017.

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.*

The following permits were obtained for the demolition and assessment activities at the Property:

Demolition Permit

Mesa Administrative Code Title 4, Chapter 1, Section 4.1.4 states “Any owner or authorized agent who intends to construct, enlarge, alter, repair, move, demolish, or change the occupancy of a building or structure, or to erect, install, enlarge, alter, repair, remove, convert, or replace any electrical, gas, mechanical, or plumbing system, the installation of which is regulated by this Chapter or the technical codes, or to cause such work to be done, shall first make application to the Building Safety Director and obtain the required permit or permits.” The City of Mesa Building Safety Department issued Permit No. BLD2017-03722 for the demolition of the Property buildings. Demolition of the Property buildings was performed by Breinholt Contracting Company (Breinholt) between June and August 2017. The demolition permit was cancelled by Breinholt following completion of demolition activities.

Dust Control Permit

Maricopa County Air Pollution Control Regulations Rule 200, Section 305 (Earthmoving Permit) requires any earthmoving operation disturbing more than 0.1 acres to obtain a Dust Control permit. The permit is required from initial ground breaking through final stabilization and is valid for 1 year from the date of issuance.

Demolition and additional assessment activities disturbed more than 0.1 acres and, therefore, Allwyn obtained a Dust Control permit from the Maricopa County Air Quality Department (MCAQD), Permit No. E171434. Allwyn and the demolition subcontractors complied with the requirements of the Dust Control permit including following the dust control plan, posting an informational sign and maintaining daily Dust Control Logs. Allwyn submitted a dust permit cancellation request on January 12, 2018 and the cancellation was approved on January 27, 2018.

Stormwater Pollution Prevention

Construction activities, including those associated with remediation, that disturb more than 1.0 acre and have the potential to enter waters of the United States or a storm drain system must obtain authorization prior to the discharge. Construction activities disturbing more than one acre can obtain authorization through a Construction General Permit (AZG2013-001) issued by ADEQ. To obtain authorization for stormwater discharges associated with construction activity under this general permit, the operator must comply with all the requirements of the general permit, including implementation of a Stormwater Pollution Prevention Plan (SWPPP) tailored to the site, and submission of a Notice of Intent (NOI). Allwyn submitted an NOI and obtained coverage under the general permit on June 14, 2017 (ID Number AZCN66228). Allwyn also prepared and implemented a SWPPP for demolition and assessment activities.

Allwyn submitted an NOI to be covered under the general permit (authorization identification number - AZCN66228) and prepared a SWPPP for demolition, remediation, and assessment activities. Allwyn submitted a Notice of Termination (NOT) to ADEQ to terminate permit coverage on January 12, 2018.

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. In a separate map, Sunbelt may include the NFA boundary with labeling that illustrates the supporting characterization data for any area included in the NFA.

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 boundary map was emailed to Ms. Joey Pace, ADEQ VRP Project Manager on March 9, 2018.

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:

Volatile Organic Compounds (VOCs)	
1,1,1-Trichloroethane	1,1,1,2-Tetrachloroethane
1,1,2,2-Tetrachloroethane	1,1,2-Trichloroethane
1,1-Dichloroethane	1,1-Dichloroethene (Dichloroethylene)
1,2,4-Trichlorobenzene	1,2,3-Trichloropropane
1,2,4-Trimethylbenzene	1,2-Dibromoethane
1,2-Dichlorobenzene	1,2-Dichloroethane
1,2-Dichloropropane	1,3,5-Trimethylbenzene
1,3-Butadiene	1,3-Dichlorobenzene
1,4-Dichlorobenzene	1,4-Dioxane
2-Butanone (MEK)	4-Methyl-2-Pentanone (MIBK)
Acetone	Acrylonitrile
Allyl chloride	Benzene
Benzyl chloride	Bromodichloromethane
Bromobenzene	Bromoethene (Vinyl Bromide)
Bromoform	Bromomethane
Butyl benzene	Carbon disulfide
Carbon tetrachloride	Chlorobenzene
Chloroethane	Chloroform
Chloromethane	2-Chlorotoluene
Cis-1,2-Dichloroethene	Cis-1,3-Dichloropropene
Cyclohexane	Dibromochloromethane
1,2-Dibromo-3-Chloropropane	Dibromomethane

Volatile Organic Compounds (VOCs)	
Dichlorodifluoromethane	Dicyclopentadiene
Ethyl acetate	Ethylbenzene
Hexachlorobutadiene	Hexane
Isopropylbenzene (Cumene)	Methyl tert-butyl ether
Methylcyclohexane	Methylene chloride
Naphthalene	n-Propylbenzene
Sec-Butylbenzene	Styrene
Tert-Butylbenzene	Tetrachloroethene
Tetrahydrofuran	Toluene
Trans-1,2-Dichloroethene	Trans-1,3-Dichloropropene
Trichloroethene	Trichlorofluoromethane
Trichlorotrifluoroethane	Vinyl acetate
Vinyl chloride	Total Xylenes

Semi-Volatile Organic Compounds (SVOCs), including Polynuclear Aromatic Hydrocarbons (PAHs)	
Acenaphthene	Aniline
Anthracene	Benz(a)anthracene
Benzo(a)pyrene	Benzo(b)fluoranthene
Benzo(k)fluoranthene	Benzoic Acid
Benzyl alcohol	bis-(2-chloroethyl) ether
bis-(2-chloroisopropyl) ether	bis-(2-ethylhexyl) phthalate
Butyl benzyl phthalate	4-Chloroaniline
2-Chloronaphthalene	2-Chlorophenol
Chrysene	Di-n-butyl phthalate
Di-n-octyl phthalate	Dibenz(a,h)anthracene
Dibenzofuran	1,2-Dichlorobenzene
1,3-Dichlorobenzene	1,4-Dichlorobenzene
3,3-Dichlorobenzidine	2,4-Dichlorophenol
Diethyl phthalate	Dimethyl phthalate
2,4-Dimethylphenol	2,4-Dinitrophenol
2,4-Dinitrotoluene	2,6-Dinitrotoluene
Fluoranthene	Fluorene
Hexachlorobenzene	Hexachlorobutadiene
Hexachlorocyclopentadiene	Hexachloroethane
Indeno(1,2,3-cd)pyrene	Isophorone
2-Methylphenol	3 & 4-Methylphenol
N-Nitrosodiphenylamine	Naphthalene
2-Nitroaniline	3-Nitroaniline
4-Nitroaniline	Nitrobenzene
Pentachlorophenol	Phenol
Pyrene	1,2,4-Trichlorobenzene
2,4,5-Trichlorophenol	2,4,6-Trichlorophenol

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

Polychlorinated Biphenyls (PCBs)
Total PCBs

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 two days in the Arizona Business Gazette, a weekly newspaper.

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

Sincerely,
ALLWYN CONSULTANTS

Holly Land
Senior Regulatory Specialist

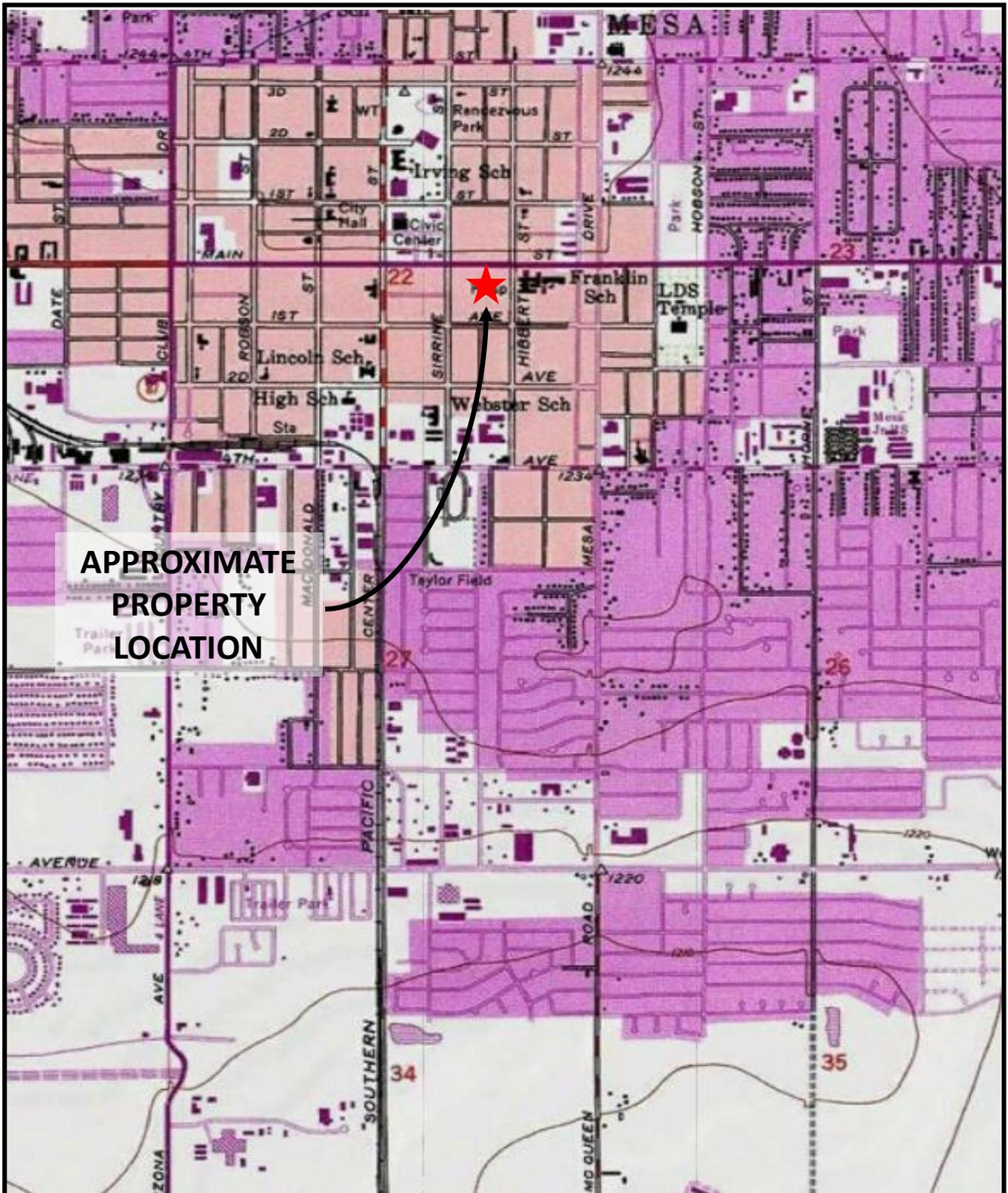
Tod Whitwer, P.E.
Principal

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

Distribution: (2) Addressee

No Further Action Report
Sunbelt AN LLC
Former AutoNation Dealership - Site Code: 512938-00
145 East Main Street, Mesa, Arizona

FIGURES



**APPROXIMATE
PROPERTY
LOCATION**

**Figure 1
Site Location**

No Further Action Report
Former AutoNation Dealership
145 East Main Street; Mesa, Arizona
Site Code: 512938-00

Sunbelt AN LLC
6720 North Scottsdale
Road Suite 250
Scottsdale, Arizona
85253



Not to Scale



4050 East Cotton Center
Boulevard, Suite 49, Phoenix,
Arizona 85040

Project Number: 0123-0005-01

March 28, 2018



Figure 2
No Further Action Boundary Area

No Further Action Report
 Former AutoNation Dealership
 145 East Main Street; Mesa, Arizona
 Site Code: 512938-00

Project Number: 0123-0005-01

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Sunbelt AN LLC
 6720 North Scottsdale
 Road Suite 250
 Scottsdale, Arizona
 85253



Not to Scale



4050 East Cotton Center
 Boulevard, Suite 49, Phoenix,
 Arizona 85040

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ATTACHMENT A

DRAFT NFA PUBLIC NOTICE

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

Sunbelt AN LLC (Sunbelt) 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 AutoNation Dealership VRP site (VRP Site Code 512938-00). The NFA requests closure for soil and was submitted in accordance with Arizona Revised Statutes § 49-181.

The Former AutoNation Dealership VRP site consists of the property located at 145 East Main Street in Mesa, Arizona. Contaminants of concern at the site are Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), including Polynuclear Aromatic Hydrocarbons (PAHs), Resource Conservation and Recovery Act (RCRA) Metals (arsenic, barium, cadmium, total chromium, lead, mercury, selenium, and silver), and Polychlorinated Biphenyls (PCBs).

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 Former AutoNation Dealership 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, Allwyn Consultants, 4050 E. Cotton Center Blvd., Suite 49, Phoenix, AZ 85040 or Hland@allwynllc.com and reference this listing.

Comments must be postmarked or received by ADEQ or Allwyn Consultants by [insert date, 30 days from original publication], 2018.

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.

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