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May 16, 2018

Joey Pace
Project Manager/Hydrogeologist
Arizona Department of Environmental Quality
Remedial Projects Section, Voluntary Remediation Program
1110 West Washington Street, 6th Floor
Phoenix, AZ 85007
(602) 771-4818

Subject: No Further Action Report
Fletcher's Tire & Auto Service – Store #920
12445 North Cave Creek Road
Phoenix, Arizona 85022
VRP Site Code: 513003-00

Dear Ms. Pace:

On behalf of Bridgestone Retail Operations (BSRO), Catalyst Environmental Solutions (Catalyst) has prepared this No Further Action (NFA) Report for Fletcher's Tire & Auto Service – Store #920 (site) located at 12445 North Cave Creek Road in Phoenix, Arizona (Figure 1). The report has been prepared in accordance with your letter dated April 30, 2018 which stated that the site had been adequately characterized and requested the submittal of an NFA Report. Accordingly, the subsequent sections provide the specific information required for obtaining regulatory closure of the site.

1) Requirements listed in Arizona Revised Statutes (A.R.S.) § 49-181(A)

- *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), 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 description of the actions taken to achieve remediation levels or controls determined in accordance with section 49-175, subsection B.*

Several rounds of environmental site assessment activities have been conducted at the site to characterize the nature and extent of potential subsurface impacts. The results of these activities indicated detectable concentrations of selected VOCs, PAHs, and metals in soil and VOCs in soil gas. However, the detected concentrations were all below applicable Arizona Department of Environmental Quality (ADEQ) residential soil remediation levels (rSRLs) and Groundwater Protection Levels (GPLs). These assessment activities are discussed in more detail below.

A Phase I Environmental Site Assessment (ESA) was conducted at the site in January 2017 as documented in the Phase I Environmental Site Assessment Report dated January 9, 2017 (Nova 2017a). The results of the Phase I ESA indicated no evidence of Controlled Recognized Environmental Conditions (CRECs), or Historic Recognized Environmental Conditions (HRECs) in connection with the site, except for the former used-oil UST that was removed prior to 1988 and for which the ADEQ issued a No Further Action (NFA) letter in October 1996. The only Recognized Environmental Condition (REC) was the site's use as an auto service and repair facility given the potential for past operations to have impacted the subsurface through the release of petroleum products and/or hazardous substances.

Based on the findings of the January 2017 Phase I ESA (Nova 2017a), a limited Phase II subsurface investigation was conducted in February 2017 (Nova 2017b) to evaluate whether past operations had impacted the subsurface at the site. The scope of the investigation involved advancing seven interior soil borings adjacent to the former inground hydraulic lifts and one exterior soil boring in the vicinity of a vent pipe observed immediately northwest of the service area. VOCs, PAHs, and PCBs were not detected above the laboratory reporting detection limits (RDLs) in any of the soil samples analyzed. The laboratory RDLs were below the ADEQ Residential SRLs as well as GPLs. In regard to metals, the soil sample results indicated detectable levels of arsenic, barium, chromium, and lead at concentrations below their respective ADEQ rSRLs and GPLs. Cadmium, selenium, silver, and mercury were not detected above RDLs which were all below their respective ADEQ rSRLs and GPLs.

In August 2017, a supplemental subsurface investigation was conducted to further assess subsurface soil and soil gas conditions in the vicinity of five service bays, an interior used-oil aboveground storage tank (AST), and a vent pipe observed at the northeastern end of the building (Nova 2017c). Specifically, the scope of work involved a soil investigation consisting of ten soil borings and a soil gas investigation that consisted of the collection of soil gas samples at six locations. In soil, no VOCs or PAHs were detected above applicable ADEQ rSRLs or GPLs. In regard to metals, the soil sample results indicated levels below applicable ADEQ rSRLs and GPLs with the exception of one arsenic sample which exceeded the ADEQ rSRL. However, a 95% upper confidence limit (UCL) value was calculated using all of the arsenic results for the site and the result indicated that the 95% UCL of the arsenic detections was below the ADEQ rSRL and GPL (Catalyst 2018a).

The August 2017 soil gas sample results indicated detectable concentrations of selected VOCs. To evaluate the significance of the results, the detected concentrations were converted to equivalent soil-phase concentrations using the ADEQ Groundwater Protection Leaching Model (ADEQ 2013) and then compared to the ADEQ rSRLs and GPLs. The calculated equivalent soil-phase concentrations were all below their respective ADEQ rSRLs and GPLs (Catalyst 2018a).

Lastly, an additional assessment was conducted in March 2018 (Catalyst 2018b) to characterize soil gas along the eastern property boundary of the site in the vicinity of adjacent residences and assess indoor air quality within the service area of the building on the site with respect to regulatory screening levels for indoor workers. The scope of work involved the collection of two soil gas samples from three locations along the eastern property boundary, the collection of one indoor air sample in the service bay overlying the area with the highest soil gas results from prior sampling, and the collection of one ambient air sample from outside of the building on the site.

The soil gas results indicated detectable concentrations of selected VOCs. The detected concentrations were converted to equivalent soil-phase concentrations using the ADEQ Groundwater Protection Leaching Model (ADEQ 2013) and then compared to the ADEQ rSRLs and GPLs. The calculated equivalent soil-phase concentrations were all below their respective ADEQ rSRLs and GPLs (Catalyst 2018b). None of the analyzed constituents were detected in the indoor air sample, and the only analyte detected in the ambient air sample was acetone.

Based on the results of the assessment activities conducted at the site, ADEQ issued a letter on April 30, 2018 indicating that the site had been adequately characterized and to proceed with preparing and submitting an NFA Report.

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

Not Applicable – the analytical results for soil and soil gas were all below applicable ADEQ rSRLs and GPLs, so no remediation was required at the site.

- *Whenever institutional or engineering controls are placed on the site:*
 - *A demonstration that any engineering control or combination of engineering controls has been constructed, is functioning, and will be maintained.*
 - *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 are required at the site.

- *If post-remediation 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 at the site.

- *A description of community involvement activities undertaken to meet the requirements of section 49-176.*

Not Applicable – the analytical results for soil and soil gas were all below applicable ADEQ rSRLs and GPLs, so no remediation was required at the site.

- *A list of permits under this title obtained for the remedial action or held by the applicant pertaining to the site.*

Not Applicable - no remediation was required at the site, and no permits were required for the soil and soil gas investigation activities.

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

A general site location map is attached as Figure 1.

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.

As indicated in the ADEQ letter dated April 30, 2018, the NFA boundary covers the areas of investigation at the site which consist of: 1) the footprint of the building; and, 2) the rectangular area

along the eastern property boundary encompassing the locations of the soil gas investigation conducted in March 2018. Figure 2 presents a scaled map of the site and the NFA boundary area.

4) A digital NFA boundary map.

A digital NFA boundary map was emailed to Ms. Joey Pace, ADEQ VRP Project Manager, on May 16, 2018.

5) A table of the contaminants for which the NFA is sought. Only contaminants for which characterization has been completed, and for which an rSRL exists, may be included.

Volatile Organic Compounds (VOCs)		
1,1,1-Trichloroethane	Benzyl chloride	Isopropylbenzene
1,1,2,2-Tetrachloroethane	Bromodichloromethane	Methyl tert-butyl ether
1,1,2-Trichloroethane	Bromoethene (Vinyl Bromide)	Methylcyclohexane
1,1-Dichloroethane	Bromoform	Methylene chloride
1,1-Dichloroethene	Bromomethane	Naphthalene
1,2,4-Trichlorobenzene	Butyl benzene	Propylbenzene
1,2,4-Trimethylbenzene	Carbon disulfide	Sec-Butyl benzene
1,2-Dibromoethane	Carbon tetrachloride	Styrene
1,2-Dichlorobenzene	Chlorobenzene	Tert-Butyl benzene
1,2-Dichloroethane	Chloroethane	Tetrachloroethene
1,2-Dichloropropane	Chloroform	Tetrahydrofuran
1,3,5-Trimethylbenzene	Chloromethane	Toluene
1,3-Butadiene	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene
1,3-Dichlorobenzene	cis-1,3-Dichloropropene	trans-1,3-Dichloropropene
1,4-Dichlorobenzene	Cyclohexane	Trichloroethene
1,4-Dioxane	Dibromochloromethane	Trichlorofluoromethane(F-11)
2-Butanone (MEK)	Dichlorodifluoromethane(F-12)	Trichlorotrifluoroethane(F-113)
2-Hexanone	Ethyl Acetate	Vinyl acetate
Acetone	Ethylbenzene	Vinyl chloride
Allyl chloride	Hexachlorobutadiene	Xylenes
Benzene	Hexane	

Polynuclear Aromatic Hydrocarbons (PAHs)	
Anthracene	Dibenz(a,h)anthracene
Acenaphthene	Fluoranthene
Acenaphthylene	Fluorene
Benzo(a)anthracene	Indeno(1,2,3-cd)pyrene

Polynuclear Aromatic Hydrocarbons (PAHs)	
Benzo(a)pyrene	Naphthalene
Benzo(b)fluoranthene	Pyrene
Benzo(k)fluoranthene	2-Chloronaphthalene
Chrysene	

RCRA Metals	
Arsenic	Lead
Barium	Mercury
Cadmium	Selenium
Total Chromium	Silver

Polychlorinated Biphenyls (PCBs)
Total PCBs

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.

We appreciate the opportunity to provide you with this information, and please let me know if you have any questions/comments or need any additional information.

Sincerely,

David Blankenhorn, PG
 Director of Client Services
 CELL: (805) 844-0205
 EMAIL: dblankenhorn@ce.solutions

References

Arizona Department of Environmental Quality. 2013. Spreadsheet Groundwater Protection Leaching Model. January 2013.

Catalyst Environmental Solutions. 2018a. Site Characterization Report, Fletcher's Tire & Auto Service – Store #920, 12445 N. Cave Creek Road, Phoenix, Arizona. January 8, 2018.

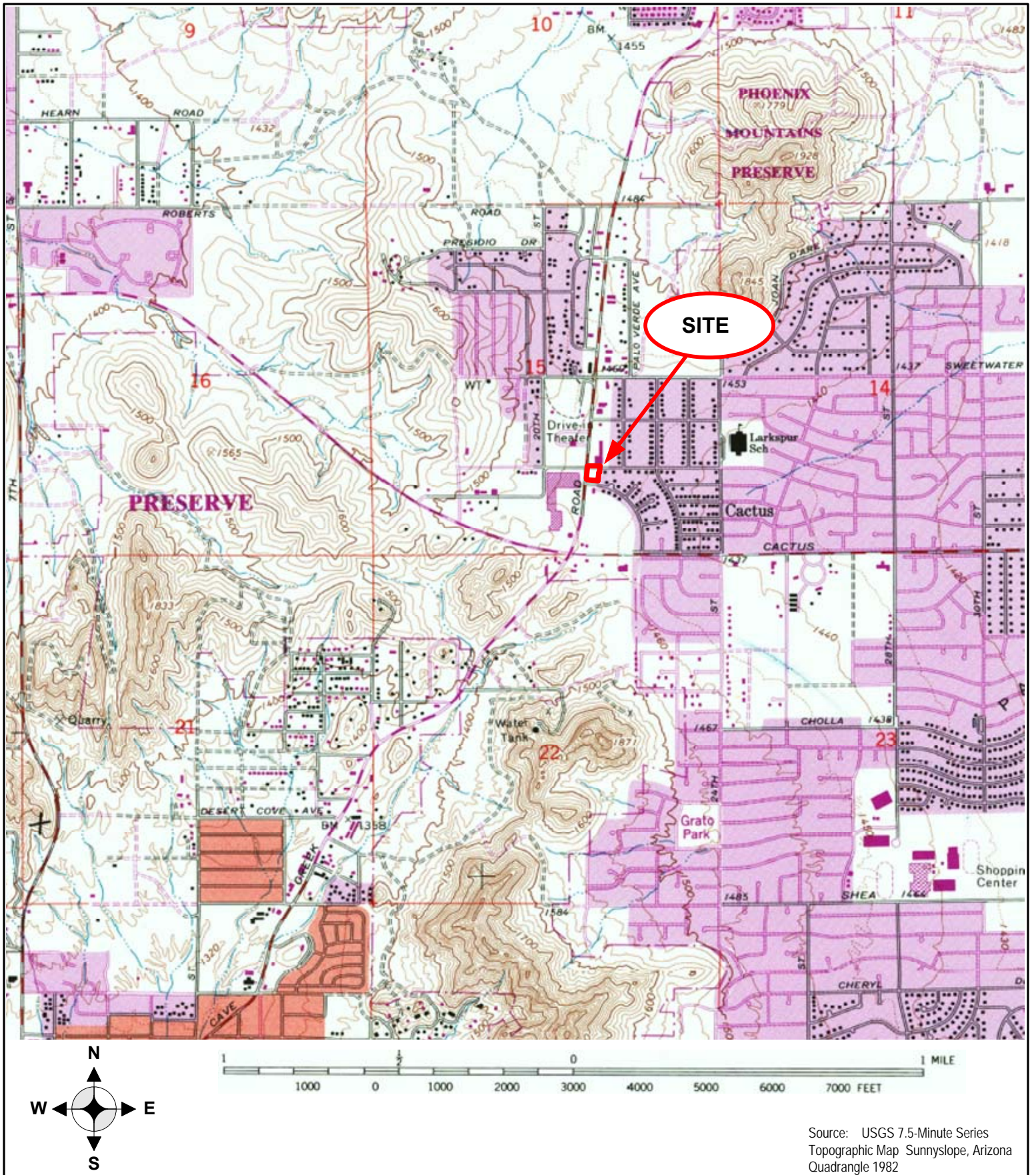
Catalyst Environmental Solutions. 2018b. Additional Site Assessment Report, Fletcher's Tire & Auto Service – Store #920, 12445 N. Cave Creek Road, Phoenix, Arizona. April 16, 2018.

Nova Environmental Consulting Group. 2017a. Phase I Environmental Site Assessment Report. January 9, 2017.

Nova Environmental Consulting Group. 2017b. Limited Phase II Subsurface Investigation Report. February 15, 2017.

Nova Environmental Consulting Group. 2017c. Draft Supplemental Subsurface Investigation Report. August 14, 2017.

FIGURES



SITE LOCATION MAP

Fletcher's Tire & Auto Service
12445 North Cave Creek Road
Phoenix, Arizona 85022



Figure 1



ATTACHMENT A
DRAFT NFA PUBLIC NOTICE

**NOTICE OF 30-DAY PUBLIC COMMENT PERIOD
FLETCHER'S TIRE & AUTO SERVICE – STORE #920
VOLUNTARY REMEDIATION PROGRAM SITE
REQUEST FOR NO FURTHER ACTION DETERMINATION**

Bridgestone Retail Operations (BSRO) has submitted a request for a No Further Action (NFA) determination to the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) for Fletcher's Tire & Auto Service – Store #920 (VRP Site Code 513003-00). The NFA requests closure for soil at the site and was submitted in accordance with Arizona Revised Statutes §49-181.

Fletcher's Tire & Auto Service – Store #920 is located at 12445 North Cave Creek Road in Phoenix, Arizona. The contaminants of concern at the site consist of Volatile Organic Compounds (VOCs), 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 located at 1110 W. Washington Street in Phoenix. Please call (602) 771-4380 or (800) 234-5677 (ext. 6027714380) for hours of operation and to schedule an appointment.

PARTIES WISHING TO SUBMIT WRITTEN COMMENTS regarding the NFA request for the Fletcher's Tire & Auto Service – Store #920 site may do so through the following contacts:

- Arizona Department of Environmental Quality
Attention: Joey Pace, Voluntary Remediation Program
Pace.Joey@azdeq.gov
1110 W. Washington Street
Phoenix, AZ 85007; or,
- Catalyst Environmental Solutions Corporation
Attention: David Blankenhorn
dblankenhorn@ce.solutions
315 Montana Ave, Ste 311
Santa Monica, CA 90403

Comments must be postmarked or received by ADEQ or Catalyst Environmental Solutions 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 Non-Discrimination 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