
January 2025 Monthly Progress Report Former KK site remediation project, Site Code 514031-00

1 message

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The reporting period is December 30, 2024-January 31, 2025. Therefore, this is the January 2025 Monthly Progress Report.

January 2025 Administrative Activities

1. Preparation of the Remedial Action Plan (RAP) Addendum providing the revised removal action that includes:
 - a. Consolidation of pesticide impacted soil and installation of an engineering control (EC) on an approximate 5.82-acre parcel located in the northeast portion of the Site. This will require a Declaration of Environmental Use Restriction with EC.
 - b. Remediation of soil within the remaining approximate 9.18 acres to unrestricted use using a combination of chemical oxidation and excavation.

Figure 2 attached provides the revised remedial plan.

2. Disposal of the concrete removed during excavation of the landfill:
 - a. A revised waste profile was completed, including additional toxicity characteristic leaching procedure (TCLP) pesticide and mercury extraction and analysis. The revised waste profile and application were submitted to Republic Services on December 13, 2024. The broken concrete was subsequently accepted for disposal in the Apache Junction Landfill as non-hazardous waste.
 - b. Pacific West Environmental (PWE) prepared waste manifests for City of Chandler signature.

January 2025 Field Activities

PWE remobilized to the Site on January 13, 2025 to implement the revised removal action. The following was performed:

1. PWE began removing concrete for off-Site disposal on January 13, 2025. Concrete removal was completed on January 22, 2025. Based on weigh tickets, 6,367.60 tons of concrete were disposed in the Republic Services Apache Junction Landfill.
2. Waste characterization for asbestos containing roofing material removed from the landfill. After discussions with ADEQ and Republic Services, samples of roofing material to be removed from the slope of the landfill excavation would be collected and analyzed for TCLP pesticides by EPA Method 8081B and for the eight TCLP Resource Conservation Recovery Act (RCRA) metals by EPA Method 6010/7470. WSP contacted several Arizona licensed analytical laboratories regarding analysis of samples confirmed to contain asbestos. The only laboratory that

indicated they would accept the samples was Turner Laboratory in Tucson, Arizona. Turner Laboratory was able to perform the TCLP extraction; however, Turner Laboratory is only licensed for metals analysis by EPA method 6010/7470 and is not licensed to analyze samples for pesticides by EPA Method 8081. Therefore, Turner Laboratory would analyze the extractant for the eight RCRA metals and would submit the extractant sample to Eurofins Testing America for pesticide analysis by EPA Method 8081B. Samples of the roofing material were collected from the west and east slopes of the landfill excavation and submitted to Turner Laboratory on January 21, 2025.

3. Excavation of asbestos containing roofing materials from the west slope of the landfill excavation (decision units [DUs] 27 and 58 on Figure 2) from January 22-27, 2025. The removed roofing material was placed in 11 roll-off bins. On January 24, 2025, buried asphalt was removed from the north slope of the landfill excavation (DUs 24 and 25 on Figure 2)). No asbestos containing materials were observed. The asphalt was placed in a stockpile. Due to a lack of storage bins and update of equipment on the weather station tower, excavation of the roofing materials ceased on January 27, 2025.
4. There are DUs and portions of DUs within the planned unrestricted use parcel that were determined by the EE/CA investigation as having compound of concern (COC) concentrations protective of unrestricted use. This determination was based on immunoassay results and were identified on Figure 2 with toxaphene concentrations of either <2.8 mg/kg and >2.8 mg/kg. These were also discreet samples collected in the approximate center of the DU. During the RAP approval process, ADEQ indicated that immunoassay samples results are only field screening results and are not compliance results for remediation confirmation. In the RAP comments and approval, ADEQ did not require compliance sampling of these DUs. However, considering the revised soil removal action, compliance sampling of these DUs is included in this RAP Addendum. Therefore, the RAP Addendum includes collection of shallow interval (0-1 ft) and deep interval (1-2 ft) composite soil samples from the following DUs; DU 3 (dirt area west of road), DU 4 (dirt area west of road), DU 6 (dirt area west of road), DU 11 (dirt area west of road), DU 16 (dirt area west of road), DU 17 (dirt area west of road), DU 29 (dirt area west of road), DU 33 (dirt area west of road), DU 42 (dirt area west of road), DU 38, DU 40, DU 43, DU 45, DU 47, DU 48, DU 49, DU 50, DU 51, DU 52, DU 66 (between edge of DEUR area and southern edge of DU). Deep interval samples will be held until the results of the shallow interval samples are received. If a shallow interval soil sample is reported with COC concentrations above RSRLs, the corresponding deep interval sample will be analyzed. Soil reported with COCs above RSRLs will be removed by excavation. On January 27, 2025, soil samples were collected from DUs 3, 4, 6, 11, 16, 17, 29, 33, and 42 were collected and the shallow interval composite soil samples submitted to Eurofins. The toxaphene results are provided as follows; DU 3 (8.8 mg/kg), DU 4 (11 mg/kg), DU 6 (1.7 mg/kg), DU 11 (0.10 mg/kg), DU 16 (0.065 mg/kg), DU 17 (0.32 mg/kg), DU 29 (0.55 mg/kg), DU 33 (0.18 mg/kg), and DU 42 (0.062 mg/kg). The only COC that exceeded RSRLs was toxaphene in the samples collected from DUs 3 and 4. Therefore, the deeper interval samples for these DUs will be submitted to Eurofins for analysis. Pending the analytical results, at a minimum the shallow toxaphene impacted interval of DUs 3 and 4 will be removed by excavation. No additional sample analysis or removal are required for DU 6, DU 11 (just portion west of the road), DU 16, DU 17, DU 29, DU 33, and DU 42. Confirmatory composite soil samples will be collected from DUs 38, 40, 43, 45, 47, 48, 49, 50, 51, 52, and 66 later after stockpiled soils are removed from these DUs.
5. Backfill of the landfill excavation with COC impacted soil that originated from the landfill began on January 27, 2025. Through January 31, 2025, three six-inch lifts of soil had been placed in the landfill and compacted. Compaction was confirmed to 98% maximum dry density. An estimated 7,500 cubic yards of soil had been placed in the landfill excavation


Planned Activities for February 2025

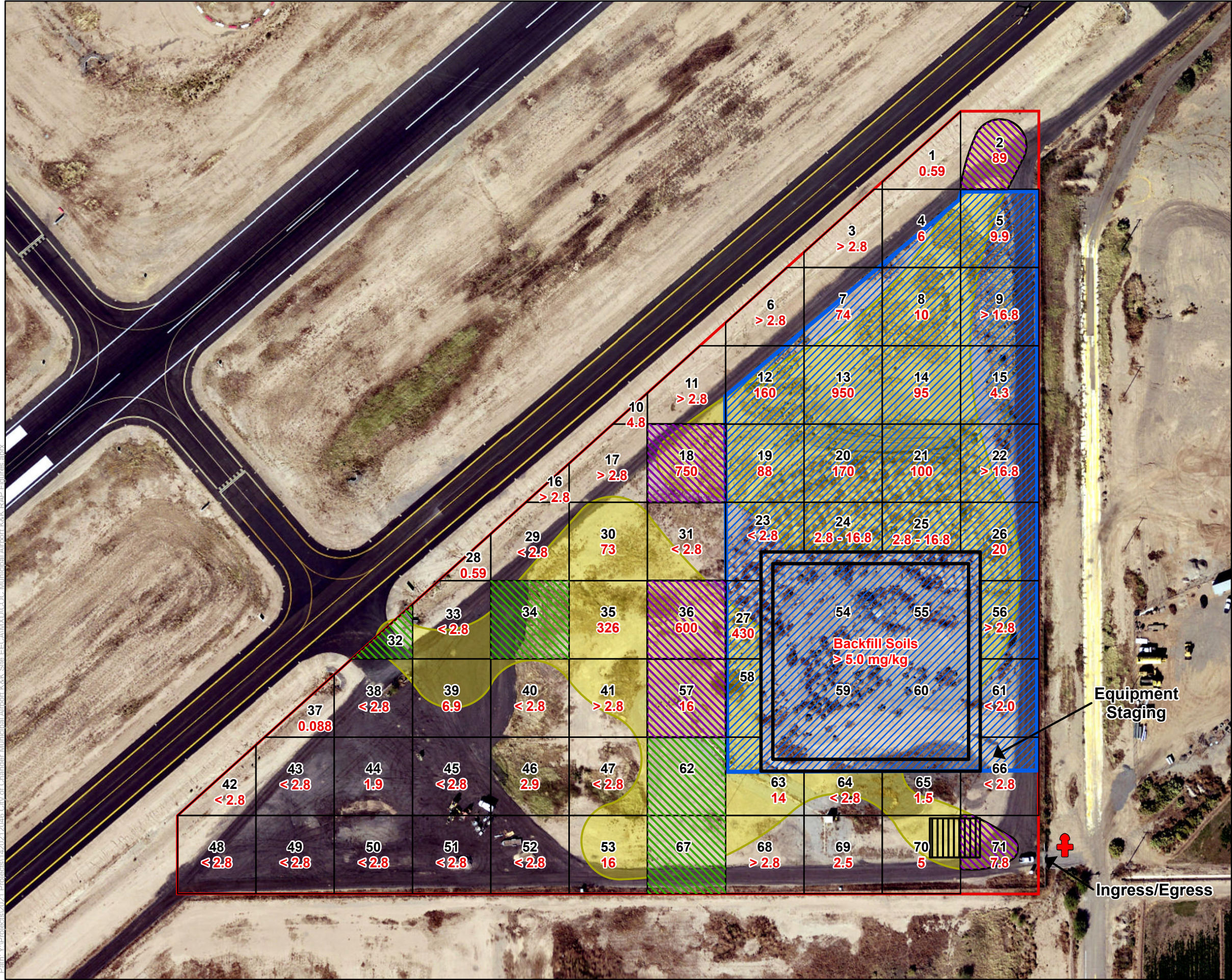
1. Continued consolidation of toxaphene contaminated soil in the landfill excavation.
2. Complete removal of asbestos containing roofing materials from the east and west slopes of the landfill excavation.
3. Remediation of the remaining contaminated DUs within the planned unrestricted use area is expected to commence during February 2025.
4. Submittal of the RAP Addendum.

If you have any questions or comments, please contact me.

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 **Figure2_Revised Remediation Plan_v4.pdf**
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Legend

- Project Limits
 - Consolidation Cell Boundary
 - + Water Supply (Fire Hydrant)
 - Tire Wash/Decontamination
 - Possible ISCO Treat 1-2ft Interval Pending Confirmation Sample Results
 - Soil to be excavated to a minimum of 2 ft
 - Declaration of Environmental Use Restriction Area (DEUR) 5.82 Acres
- Toxaphene Concentration**
- 5.0 mg/kg (RSRL)

Notes:

- 1** Decision Unit Identification
- 0.59** Toxaphene concentration result in mg/kg
- mg/kg** milligrams per kilogram
- Sqft** Square feet
- RSRL** Arizona Residential Soil Remediation Level
- NRSRL** Arizona Non-Residential Soil Remediation Level

Aerial Imagery: Maricopa County Assessor 2022



City of Chandler Municipal Airport
K & K Aerial Applicator Site
Chandler, Arizona

Figure 2 **Revised Remediation Plan**

Job No. US0030770
PM: JNC
Date: 1/31/2025
Scale: 1" = 125 feet



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