

**FEASIBILITY STUDY WORK PLAN
STONE AVENUE AND GRANT ROAD
WQARF REGISTRY SITE
TUCSON, ARIZONA**



October 30, 2019

Arizona Department of Environmental Quality
Remedial Projects Unit
400 W Congress Street, Suite 433
Tucson, Arizona 85701

TABLE OF CONTENTS

LIST OF ABBREVIATIONS & ACRONYMS	ii
1.0 INTRODUCTION.....	1
1.1 Purpose.....	1
1.2 Site Description	1
2.0 FEASIBILITY STUDY TASKS	1
3.0 COMMUNITY INVOLVEMENT.....	2
4.0 FEASIBILITY STUDY REPORT FORMAT	2
5.0 REFERENCES.....	4

FIGURES

Figure 1. Stone Avenue and Grant Road WQARF Site – Tucson, Arizona

LIST OF ABBREVIATIONS & ACRONYMS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
A.R.S.	Arizona Revised Statutes
AWQS	Aquifer Water Quality Standard
COC	Contaminants of Concern
EPA	Environmental Protection Agency
FS	Feasibility Study
PCE	Tetrachloroethene
RO	Remedial Objectives
RI	Remedial Investigation
SRL	Soil Remediation Level
SVSLs	Soil Vapor Screening Levels
TCE	Trichloroethene
VOC	Volatile Organic Compound
WP	Work Plan
WQARF	Water Quality Assurance Revolving Fund

1.0 INTRODUCTION

1.1 Purpose

This Work Plan (WP) presents the methodology that will be followed for completion of the Feasibility Study (FS) for the Stone Avenue and Grant Road Water Quality Assurance Revolving Fund (WQARF) site (the Site) in Tucson, Arizona. This work plan is required as part of the FS process, pursuant to Arizona Administrative Code (A.A.C.) R18-16-407(B).

The purpose of the FS is to develop and evaluate remedies that are capable of achieving the Site's Remedial Objectives (ROs). A FS report will be developed that relies on data and information from the Remedial Investigation (RI) and further work that may be conducted during the FS. The remedy for this Site will be addressing only soils pursuant to A.A.C. R18-16-407(C) and be in accordance with A.A.C R18-16-407(H.3).

1.2 Site Description

The site located in Tucson, Arizona, generally bounded to the north by West Jacinto Street, to the south by East Sahuaro Street, to the east by North Estrella Avenue and to the west by North Oracle Road (Figure 1).

The purpose of the RI was to determine the nature and extent of contamination at the site. The RI also identified present and reasonably foreseeable uses of land and waters of the state that have been or are threatened to be impacted by the contamination. As waters of the state are not impacted or threatened to be impacted, only land use was evaluated. Based upon the data collected, the following represents the interpretations and conclusions reached as a result of the RI.

The Site consists of two source areas contaminated with tetrachloroethene (PCE), the primary contaminant of concern (COC), in soil above residential Soil Remediation Levels (SRLs) (CCA, 2019). The contamination likely resulted from historic dry cleaning operations between the 1940's and 1980's within the Site area (CCA, 2019). The extent of soil vapor contamination above US EPA Soil Vapor Screening Levels (SVSLs) from the COC release is shown in Figure 1.

Land use in the area is a mixture of commercial, light industrial, public, and residential land uses (CCA, 2019). There is no appreciable surface water within the site boundaries. Groundwater is not impacted by the site. The potential receptors most likely to be influenced by the spreading of releases from the source areas are sensitive populations, workers, and on secondary streets, residents.

2.0 FEASIBILITY STUDY TASKS

This section discusses the tasks associated with the development of the FS report. The FS tasks will be performed in order to meet the requirements of A.A.C. R18-16-407. As the remedy for this Site is addressing only soils pursuant to A.A.C. R18-16-407(C), an analysis of alternative remedies is not required however further work may be conducted during the FS to collect additional information if necessary.

The FS will demonstrate that the chosen remedy:

- Addresses the contaminated soil in a manner that achieves compliance with Arizona Revised Statutes (A.R.S.) §49-152 and 18 A.A.C. 7, Article 2 and will achieve the remedial objectives for the use of the property.
- Is selected based upon best engineering, geological, or hydrogeological judgement and following the best standards of practice.
- Shall describe the reasons for selecting the remedy based on information gathered from the Remedial Investigation (RI) and information on the best available remedial methods and technologies.
- Includes a written analysis explaining how the remedy is consistent with Arizona Revised Statutes (A.R.S.) §49-282.06, including a brief explanation of the comparison criteria under R18-16-407(H.3) describing practicability, risk, cost, benefit, and discussion of this criteria in relation to each other.

3.0 COMMUNITY INVOLVEMENT

ADEQ will issue a Notice to the Public announcing availability of the work plan to implement the Feasibility Study on ADEQ's website at www.azdeq.gov. The notice may be mailed to the Public Mailing List for the site, local governments, the Community Advisory Board, the property owners, and any other interested parties.

4.0 FEASIBILITY STUDY REPORT FORMAT

An FS report will be prepared documenting the FS process. The FS report will be organized into the following sections:

- **Section 1.0 INTRODUCTION**
This section will summarize the purpose of the FS report.
- **Section 2.0 SITE BACKGROUND**
This section will present a summary of the site description, physiographic setting, nature and extent of contamination and a risk evaluation.
- **Section 3.0 FEASIBILITY STUDY SCOPING**
This section will present the regulatory requirements presented in statute and rule, delineate the remediation areas and present the ROs identified in the RI.
- **Section 4.0 IDENTIFICATION AND SELECTION OF REMEDIAL MEASURES**
This section will present how the remedy was selected considering the best available scientific information concerning available remedial technologies, using best engineering, geological or hydrogeological judgement, following the standards of practice of those fields.
- **Section 5.0 PROPOSED REMEDY**

This section will present the proposed remedy, and contain with a written analysis of how the remedy is consistent with A.R.S §49-282.06, how the remedy will achieve the ROs, and a brief discussion of the comparison criteria under R18-16-407 (H) as applied to the remedy.

- **Section 6.0 COMMUNITY INVOLVEMENT**

This section will document the community involvement activities conducted in association with the FS.

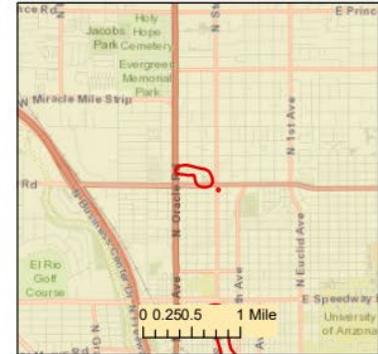
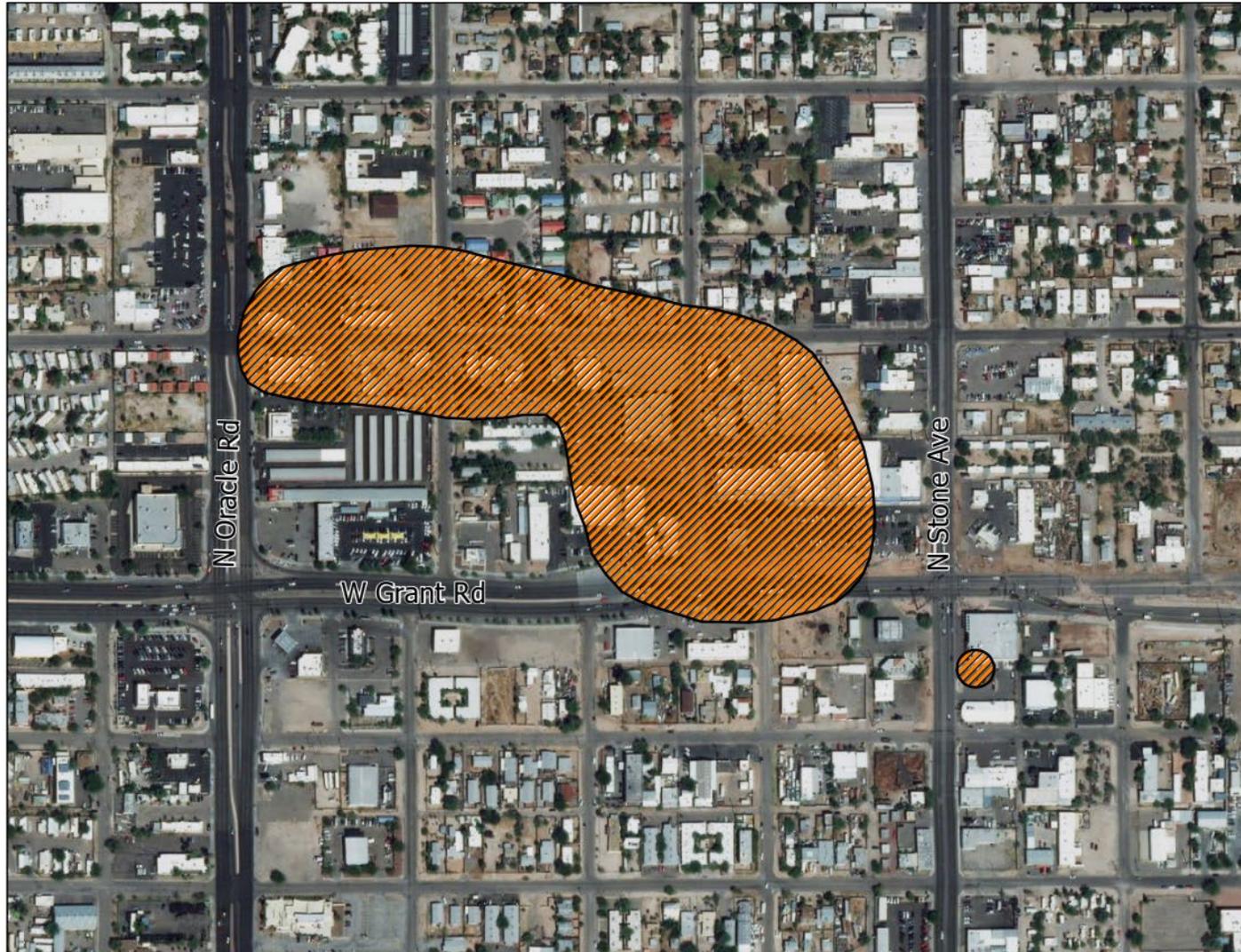
5.0 REFERENCES

Clear Creek Associates (CCA), 2019. Final Remedial Investigation Report. 31 October 2019.

FIGURES

Figure 1

Stone Ave And Grant Rd



- WQARF
- Counties

(WQARF) Water Quality Assurance
Revolving Fund Site

Publication Number: M 19-53
Plume Data Update: March 2019

Plume boundaries depicted on the site map represent ADEQ's interpretation of data available at the time the map was constructed. The map is intended to provide the public with basic information as to the estimated geographic extent of known contamination as of the date of map production. The actual extent of contamination may be different. Therefore, the plume for this site may change in the future as new information becomes available.



Date Saved: 4/3/2019