



Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

CERTIFIED MAIL  
Return Receipt Requested  
USPS # 7017 0660 0001 0575 5916

November 13, 2017

Mr. Darrell Fah  
Tesoro Refining & Marketing Company for Party BP  
400 Oceangate, Suite 600  
Long Beach, California 90802

**RE: LUST CASE CLOSURE NOTICE OF DECISION**

UST Owner/Operator ID #155  
LUST Case File #464.04  
Facility ID # 0-000492  
Maricopa County

BP West Coast Products LLC  
Gasoline product piping at east pump island  
Arco #5277  
1220 North Arizona Avenue  
Chandler, Arizona 85225

Dear Mr. Fah:

The Arizona Department of Environmental Quality (ADEQ) received your *SVE Remediation and Risk Based Closure Assessment with LUST Closure Request*, dated October 17, 2017. The Document Submittal Form states your submittal is made under Arizona Administrative Code (A.A.C.) R18-12-263.03. The submitted document requested closure using risk-based corrective action standards in accordance with A.A.C. R18-12-263.01(A)(3) and (4). Based on information submitted within the report and the case file, ADEQ has determined that the report has met the requirements of A.A.C. R18-12-263.01 and is approved in accordance with A.A.C. R18-12-263.03(E). Please refer to the enclosed *ADEQ Memorandum* for details. ADEQ is closing the LUST case file for release 464.04.

**Requirements**

Although ADEQ is not requiring further corrective actions at this time, if the Department becomes aware of site-specific conditions that warrant additional corrective actions, the referenced LUST case file may be re-opened and additional corrective actions may be required in accordance with A.A.C. R18-12-263.03(H).

Mr. Darrell Fah  
November 13, 2017  
Page 2 of 3

In accordance with A.A.C. R18-12-264, the Department assigned Facility ID and LUST case file numbers shall be included on all correspondence and reports relating to this UST facility to ensure accuracy of file identification.

If you disagree with ADEQ's determination, you have the right to file an informal appeal. An informal appeal must be received by ADEQ within thirty (30) days of receipt of this determination. Details on the appeals process are included in Attachment A.

Thank you for your efforts to comply with Arizona's environmental requirements. Should you have any comments or questions regarding this matter, please do not hesitate to contact me at (602) 771- 4551 or [Flowers.Heather@azdeq.gov](mailto:Flowers.Heather@azdeq.gov).

Sincerely,



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Heather Flowers, Hydrogeologist  
Site Investigation and Remediation Unit  
UST-LUST Section

Enclosures: *Attachment A: Notice of Appeal Rights of Interim Decision*  
*ADEQ Memorandum*

c: Mr. Thomas Olson  
8532 East Wood Drive  
Scottsdale, Arizona 85260

## Attachment A

### **Notice of Appeal Rights of Interim Decision**

This letter is considered an interim determination and you have the right to an informal appeal. To exercise the right, you must file a request for an agency review of the decision by filing a Notice of Disagreement pursuant to A.R.S. §49-1091. The review process may include an informal meeting with ADEQ to discuss the decision.

### **To File Notice of Disagreement**

To file an informal appeal of this decision, you must file a Notice of Disagreement (Notice) with ADEQ within thirty (30) days of receiving this letter. Pursuant to A.R.S. § 49-1091(C) the notice must include a written description of the specific portions of the decision with which you disagree and may include a request for a meeting with ADEQ to resolve the disagreement. ADEQ shall issue a final written decision within forty-five (45) days after receiving the Notice, or within fifteen (15) days of the informal meeting, whichever is later. If ADEQ fails to issue a final written decision within the times specified, the written interim determination becomes the final written decision which is an appealable agency action pursuant to A.R.S. §41-1092.03.

### **If No Notice of Disagreement is Filed**

If you do not file a Notice of Disagreement, ADEQ shall issue a final written decision within forty-five (45) days after issuance of the interim decision. If ADEQ fails to issue a final written decision within the time specified, this written interim decision becomes the final written decision which is an appealable agency action pursuant to A.R.S. §41-1092.03.



**Date:** November 7, 2017  
**To:** LUST File  
**From:** Debi Goodwin, Sr. Risk Assessor  
UST-LUST Section  
**Subject:** Corrective Action Completion Report  
Former ARCO Service Station 5277  
F 0-000492 L 0464.04

*Bj*

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ADEQ received the *Corrective Action Completion Report* on October 20, 2017.

**Background:**

The former ARCO Service Station 5277 is located at 1220 North Arizona Avenue in Chandler. In September 2003, three gasoline releases were identified during UST removal activities. Three of the LUST releases have been closed. LUST case file number 0464.04 was assigned to the gasoline piping at the former east dispenser island. The SCR was submitted by Secor in June 2004 and approved by ADEQ in August 2004. The release was defined vertically at less than 80 feet bgs, and laterally to 25 feet. Boring SB-3/MW-1 was documented in the SCR. Two pre-remedial soil borings (CB1 and VE-1) were installed in the immediate vicinity of the LUST release. A mobile SVE system operated between June 2016 and January 2017. Approximately 3,439.93 pounds of gasoline range organics were removed by the system.

**Tier 3 Risk Assessment**

**Groundwater:**

Groundwater samples were collected from MW-1 in 2004, 2008, 2014 and 2015 using various sampling methods. No VOCs were reported in the groundwater samples collected. The depth to groundwater in 2017 was measured at 101 feet bgs.

**Soil:**

Stantec installed confirmation boring CB2 between the location of CB1 and MW-1, in March 2017. Soil samples were collected at five foot intervals between 5 and 90 feet bgs. Soil samples were analyzed for VOCs, PAHs, and TEL. VOCs were reported in soil over applicable regulatory standards between 30 and 75 feet bgs. The only PAH reported over an applicable regulatory standard was naphthalene between 30 and 45 feet bgs. TEL was not reported over laboratory reporting limits in any of the samples.

The soil data indicates that there is no dermal contact or ingestion risk from the remaining subsurface soil contamination.

In April 2017, a shallow soil vapor survey was completed to evaluate the potential inhalation risk from the subsurface soil contamination. Six shallow (5 feet bgs) vapor probes were installed. An

undisturbed soil sample collected at SVP-1 was analyzed for geophysical parameters. The soil vapor samples were analyzed for VOCs by EPA Method TO-15 (did include the ADHS approved additional 31 compounds dated November 2011). Laboratory quality assurance (QA) and field QA measures are adequate for risk assessment data quality objectives.

The inhalation risk assessment was conducted by Stantec. The soil vapor data was modeled using the EPA on-line screening version of the Johnson and Ettinger (J&E) model forward calculation. Typical residential parameters were used in the model. The indoor air exchange rate used was  $0.25 \text{ hr}^{-1}$ , which is the model's default rate.

Chemicals are eliminated from inclusion in the risk assessment if they are not present at levels above 1/10th of the EPA Regional Screening Level resident air table dated June 2017, levels below the laboratory reporting limit, were a common laboratory contaminant and found at levels less than 5 times the concentration found in the field (equipment) blank, or if insufficient toxicity data is available or the chemical is not listed in the chemical pull down list.

The risk assessment included an evaluation of the compounds of concern (CoCs) associated with the fuel release and a separate evaluation of any non-petroleum related compounds. Chemicals were modeled for both the excess lifetime cancer risk value (ELCR) and the hazard index (HI) or non-carcinogenic health hazard. The High Indoor Air Prediction for the J&E simulation Results is used as the first comparison for a conservative approach.

A cumulative ELCR and HI value was determined for both petroleum related CoCs and non-petroleum related CoCs. The ELCR for the petroleum related CoCs is  $4.8\text{E-}08$  and the HI value is  $6.7\text{E-}04$ . The ELCR for the non-petroleum related CoCs is  $3.2\text{E-}07$  and the HI value is  $5.39\text{E-}03$ . All of the ELCR and HI values present no unacceptable risk posed by any remaining VOC contamination in the soil.

It is recommended that LUST release 0464.04 be closed.

If there any questions regarding this memo, please contact me at [dg1@azdeq.gov](mailto:dg1@azdeq.gov), or 771-4453.