



ARIZONA DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL PLANNING

**PRELIMINARY INITIAL SITE
ASSESSMENT TECHNICAL
REPORT**

I-10, I-17 (Split) to SR 202L (Santan) Project

NH-010-C(220)T
010 MA 150 F0072 01D

Prepared by:

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Approved
Ed Green
02 Apr 19

A handwritten signature in black ink, appearing to read 'Ed Green', is written over a horizontal line.

ACS Project No.: 17-238

April 1, 2019
Submittal Number: 1

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ACRONYMS AND ABBREVIATIONS

ACS	Archaeological Consulting Services, Ltd.
ADEQ	Arizona Department of Environmental Quality
ADOT	Arizona Department of Transportation
ADWR	Arizona Department of Water Resources
AMA	Active Management Area
AZ AUL	Arizona Activity and Use Limitation
AZ VCP	Arizona Voluntary Cleanup Program
AZURITE	Arizona Unified Repository for Informational Tracking of the Environment
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
DEUR	Declaration of Environmental Use Restriction
DOD	Department of Defense
DEUR	Declaration of Environmental Use Restriction
ECHO	Enforcement Compliance History Online
EDR	Environmental Data Resources, Inc.
ERNS	Emergency Release Notification System
EPA	Environmental Protection Agency
FHWA	Federal Highway Administration
HMIRS	Hazardous Materials Information Resource System
HOV	High Occupancy Vehicle
I-10	Interstate 10
I-17	Interstate 17
LQG	Large Quantity Generator
LUST	Leaking Underground Storage Tank
MP	Milepost
NEPAssist	The US Environmental Protection Agency's (EPA's) online database
NFRAP	No Further Remedial Action Planned
PFA _s	Polyfluoroalkyl Substances
PFC _s	Perfluorinated Chemicals
PISA	Preliminary Initial Site Assessment
RCRA	Resource Conservation and Recovery Act
ROW	Right-of-Way
SEMS-Archive	Superfund Enterprise Management System
SQG	Small Quantity Generator
SR	State Route
SR 202L	State Route Loop 202
TI	Traffic Interchange
U of A	University of Arizona
US	US Route
UST	Underground Storage Tank
VEMUR	Voluntary Environmental Mitigation Use Restriction

1 INTRODUCTION

The Arizona Department of Transportation (ADOT), in cooperation with the Federal Highway Administration (FHWA), is planning to improve a segment of Interstate 10 (I-10) from the I-10, Interstate 17 (I-17) (Split) Traffic Interchange (TI), milepost (MP) 149.5, to the State Route Loop 202 (SR 202L) Santan Freeway, MP 160.9. The purpose of the I-10, I-17 (Split) to SR 202L (Santan) improvement project is to enhance operational characteristics, as well as mobility of regional and local traffic.

The increasing traffic demand is causing the I-10 corridor and adjacent local arterial street system to become congested during the morning and evening peak travel periods. Future traffic volume projections indicate the congestion will worsen, causing further travel delays and increase travel times for those using the I-10 corridor. Increased congestion on I-10 will cause travelers to divert their trips to other freeway corridors and the local arterial street system, causing these transportation facilities to become increasingly congested as well. Improvements to the I-10 corridor are necessary to increase the freeway capacity and help alleviate increased levels of traffic congestion on all components of the overall transportation system in the project area.

The goal of this proposed project is to increase the capacity of the I-10 corridor in accordance with the approved regional and local transportation plans. This project would also seek to optimize the traffic operations within the corridor for the projected Design Year 2040 traffic demand, to retain local access at existing traffic interchanges, and to minimize or mitigate impacts the improvements could have on the surrounding community.

The proposed project is located in ADOT's Central District within the cities of Phoenix, Tempe, and Chandler, and the Town of Guadalupe, in Maricopa County, Arizona (Figures 1 and 2). The project also includes the segment of State Route (SR) 143 (Hohokam Expressway) from Broadway Road, MP 0.25, to just south of the south bank of the Salt River, MP 1.3, and the US Route (US) 60 (Superstition Freeway) from I-10 MP 172.0, east to Hardy Drive at MP 173.0. The approximate maximum depth of excavation for this project would be 160 feet for geotechnical investigation.

Archaeological Consulting Services, Ltd. (ACS) has completed this PISA report and a PISA form (Appendix A), which summarize the findings for this project. Work conducted by ACS for this project consisted of the following:

- A review of the project scope of work;
- A review of previous reports;
- A review of current online Google Earth aerial imagery of the project area;
- Completion of an Arizona Department of Environmental Quality (ADEQ) regulatory file review for three sites;
- An evaluation of a corridor regulatory database search report conducted for the project limits and a surrounding area of approximately 0.25 mile in each direction (also referred to as the project buffer); and

- A review of the Arizona Department of Water Resources (ADWR) online well registry tool for findings within the project limits.

The purpose of this PISA is to identify and evaluate the potential for, or actual impact of, hazardous materials and associated environmental concerns that may adversely affect the project.

Figure 1. Project Location Map

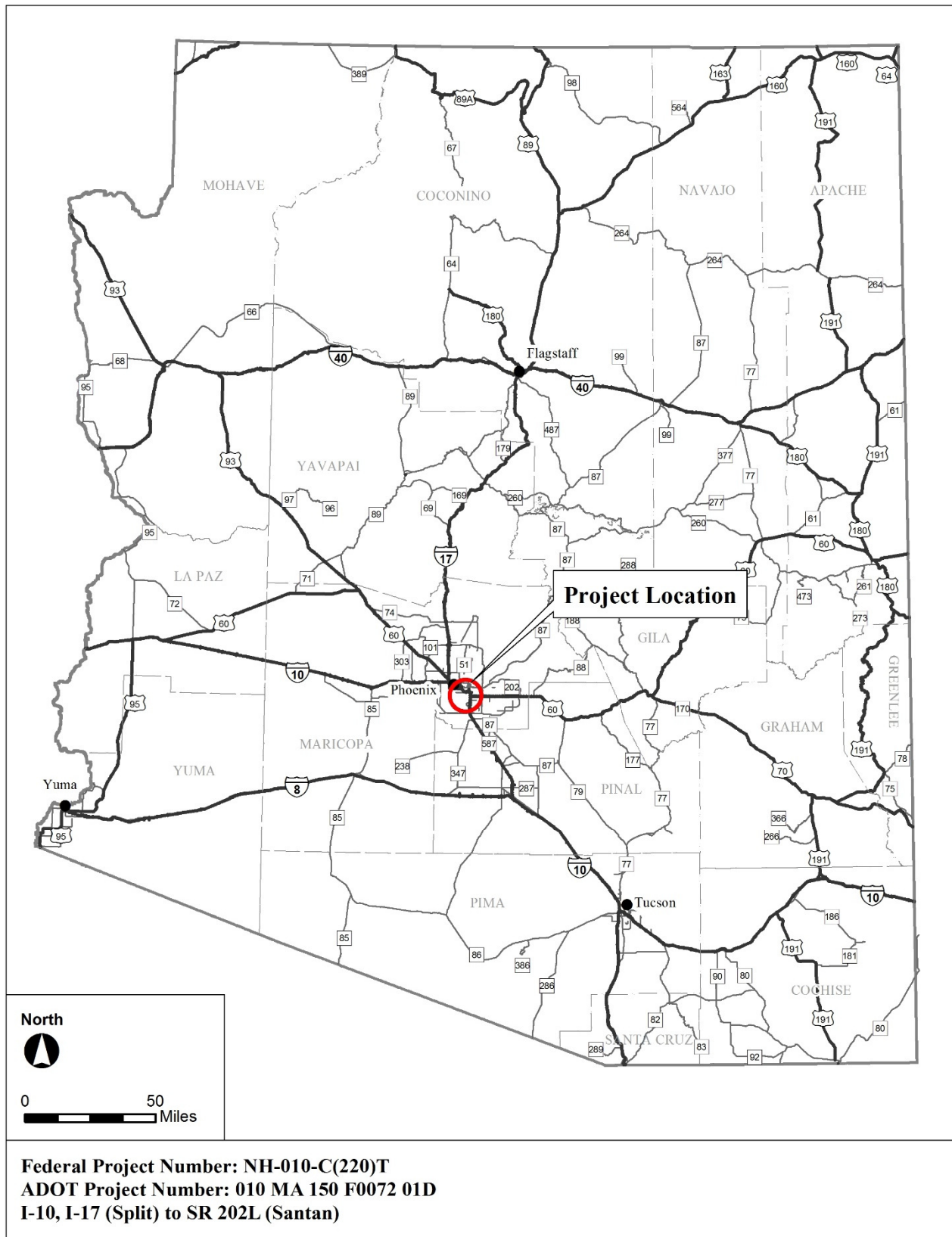
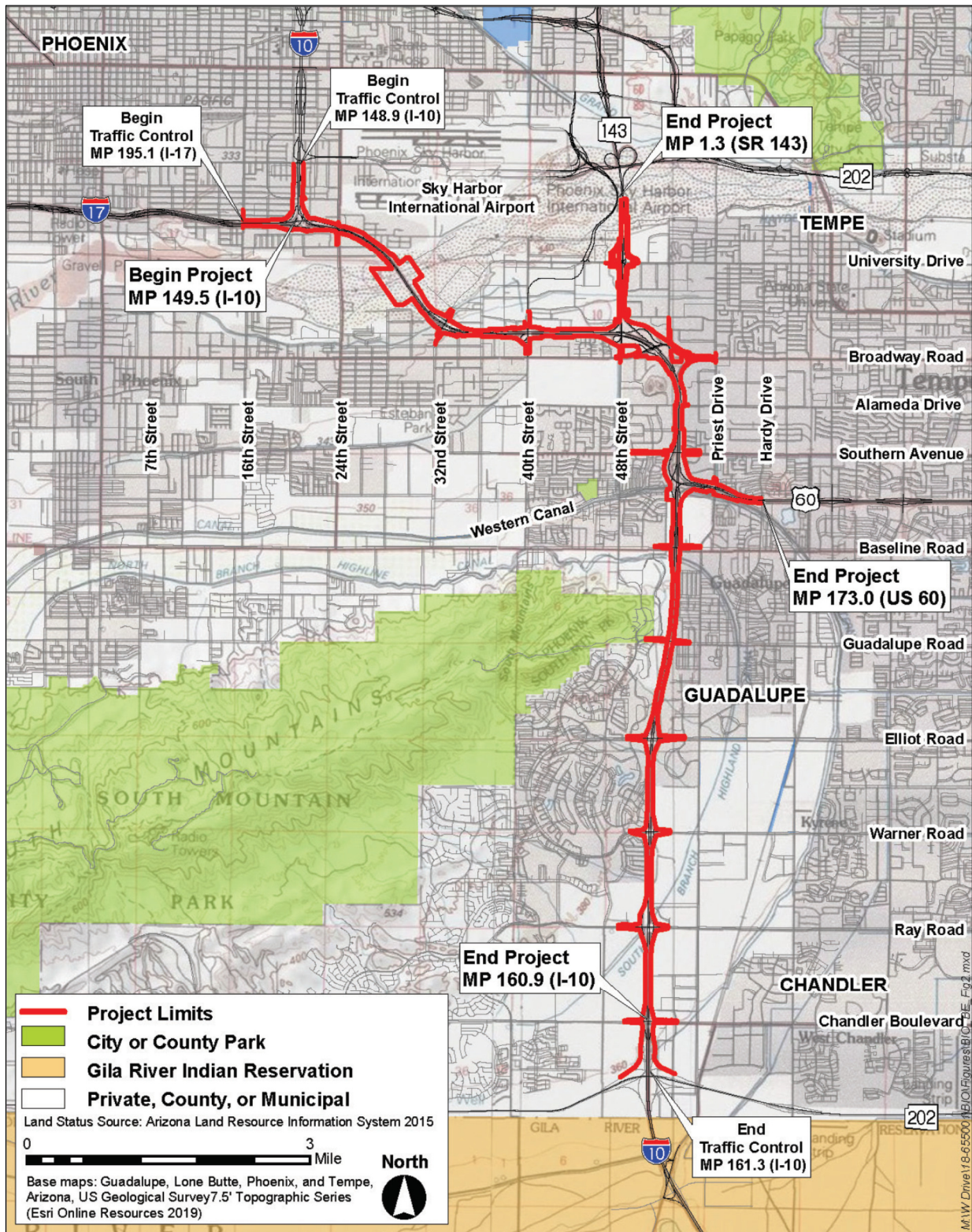


Figure 2. Project Vicinity Map



NH-010-C(220)T

010 MA 150 F0072 01D

I-10, I-17 (Split) to SR 202L (Santan)

2 PROJECT DESCRIPTION

The project scope would consist of widening and restriping I-10 within the project limits to add general-purpose lanes, high-occupancy vehicle (HOV) lanes, and auxiliary lanes; constructing collector-distributor roads, reconstructing the I-10 system interchange with SR 143 to include direct HOV access between SR 143 and I-10 to and from the east, and improving the I-10 system interchange with US 60.

The scope of work for this project consists of:

- Widening the I-10 bridge over the Salt River;
- Reconfiguring the I-10/40th Street TI as a standard diamond interchange;
- Removing the existing 48th Street and Broadway Road bridges over I-10;
- Constructing new bridges to carry 48th Street and Broadway Road over I-10;
- Constructing new bridges and structures as needed to accommodate roadway elements at the reconfigured system interchanges, SR 143, and elsewhere within the project limits;
- Constructing new pedestrian bridges over I-10 at Alameda Drive and the Western Canal;
- Widening the Guadalupe Road bridge over I-10 to accommodate a multi-use path;
- Milling the existing I-10 pavement within the project limits to a depth of 1.0 inch and replacing it with new pavement and striping;
- Installing retaining walls;
- Extending or replacing cross drain channels and culverts;
- Constructing stormwater detention basins within the project limits;
- Removing and replacing existing guardrail and barrier throughout the project limits, as needed;
- Removing and replacing chain link fence throughout the project limits;
- Installing and/or upgrading Freeway Management System facilities within the project limits, including dynamic message signs and structures;
- Installing new light poles in the I-10 median and relocating existing light poles, as needed;
- Removing and replacing existing traffic signals throughout the project limits, as needed;
- Removing existing signs and placing new signs;
- Removing existing object markers and milepost markers and placing new markers;
- Painting existing infrastructure within the project limits, as needed;
- Applying aesthetic treatments to new infrastructure to complement existing infrastructure;
- Relocating utilities;

- Clearing and grubbing vegetation within the existing right-of-way (ROW);
- Landscaping areas disturbed by construction, as needed; and
- Controlling noxious weeds within the project limits mechanically, chemically, or manually.

Project construction is currently planned to begin the summer of 2021, with an expected duration of 36 months. Traffic would be controlled to minimize impacts on motorists, pedestrians, and construction personnel as necessary. Access to residences and businesses would be maintained throughout construction. The project would occur within the existing ADOT ROW through private lands. Approximately 10.6 acres of new ROW are required to construct the project, as well as temporary construction easements. Some ROW acquisition associated with this project has already taken place. No residential displacements are anticipated.

3 *PROJECT AREA EVALUATION*

Ashton Koons of ACS reviewed current online Google Earth imagery (dated February 2018) of the project area on March 4, 2019. No obvious signs of hazardous materials issues were noted during the Google Earth imagery review.

4 *REGULATORY DATABASE SEARCH EVALUATION*

The February 13, 2019 corridor regulatory database search report indicated findings within the project area. ACS evaluated the database report and reached the conclusions presented in Table 1, found in Appendix B. The locations of the sites listed in Table 1 are shown on the maps in the Environmental Data Resources, Inc. (EDR) corridor database search report included in Appendix C. The EDR maps also depict the approximate boundaries of the project footprint and the 0.25-mile buffer. In some instances, ACS identified discrepancies between the EDR report and the current status of a site. As a result, ACS also conducted a review of the ADEQ eMaps, the US Environmental Protection Agency's (EPA's) NEPAassist, and Enforcement Compliance History Online (ECHO) websites. The most up-to-date information is presented in Table 1.

On March 8, 2019 Ashton Koons of ACS conducted a regulatory file review for three leaking underground storage tank (LUST) sites identified in the EDR report, and/or recommended for regulatory file review in a previous hazardous materials report for this project. Information obtained during the file review is summarized below.

- Arizona Auto Auction located at 3420 S. 48th Street Phoenix, AZ 85040, is associated with an open LUST case with soil and groundwater contamination that has not been adequately defined. Additionally, there are two wells on-site that have been contaminated from the LUST(s). A Continued Corrective Action Work Schedule summary was due to ADEQ on March 8, 2019. The site is located on the west side of 48th Street, approximately 615 feet north of Elwood Drive, on the boundary of the project footprint and buffer. Based on the proximity to possible disturbance and/or acquisition, and the lack of sufficient remediation at the site, ACS considers this site a concern;
- As of January 10, 2019 a LUST case was closed at the Circle K Store #2709 located at 5105 E. Elliot Road Phoenix, AZ 85044 (property was identified in a previous PISA completed for the project). The releases were associated with gasoline, and the estimated contamination boundary was located near the southwestern portion of the property, and did not exceed into the roadways (Elliot Road or 51st Street). Based on the closed status of the LUST case, this property should not impact the project as currently scoped; and
- As of July 22, 2010 a LUST case was closed at a Circle K Store #2706, formerly known as a Texaco, located at 4760 E. Broadway Road, Phoenix, AZ 85040. The releases were associated with gasoline, and the estimated contamination boundary was located near the southwestern portion of the property, and did not extend into the roadways (Broadway Road or 48th Street). In addition, this LUST case is associated with 14 wells that were abandoned on September 21, 2011. Based on the closed status of the LUST case, this property should not impact the project as currently scoped.

5 HAZARDOUS MATERIALS CONCERNS

Based on the current assessment of the project area and a review of previous reports, ACS has the following hazardous materials concerns regarding this project:

- Arizona Auto Auction is located on the boundary of the project footprint and buffer and has an associated open LUST case. Given that the contamination has not been defined, ACS considers this site a concern; and
- ACS considers the following potential concerns if acquisition or disturbance is anticipated at the properties:
 - Orbital Industrial Services and Maintenance (4024 E. Broadway Road, Phoenix, AZ 85040) is a Resource Conservation and Recovery Act (RCRA) Conditionally Exempt Small Quantity Generator (CESQG) with current violations;
 - Cutter Aviation Inc. (2802 Old Tower Road, Phoenix, AZ 85034) is a RCRA CESQG with current violations;
 - At 3002 E. Old Tower Road, Phoenix, AZ 85034 (no associated facility name), there were 46 Hazardous Materials Information Resource System (HMIRS) incidents reported. In addition, this location is adjacent to the 161st Air National Guard, a Department of Defense (DOD) Superfund site;
 - University of Arizona (U of A) Cotton Center Washing Sump (4201 E. Broadway Road, Phoenix, AZ 85040) is listed with an associated Declaration of Environmental Use Restriction (DUE) and Voluntary Environmental Mitigation Use Restriction (VEMUR), with remediation completed in 1999 and 2004. However, the EDR listing identifies that the facility withdrew their request to be included in the Arizona Voluntary Cleanup Program (VCP), and that the site did not want to pursue No Further Action (NFA) status. Association with the VCP ceased at that point, and no additional information as to the status of the contamination on-site was available;
 - Stone Net, Inc. (2635 S. 24th Street, Phoenix, AZ 85034) is an active AZ VCP site, associated with soil and groundwater contamination consisting of jet fuel, mineral spirits, Stoddard solvent, and chlorinated hydrocarbons; and
 - 161st Air National Guard DOD Superfund site currently under investigation for the potential presence of Per- and Polyfluoroalkyl Substances (PFAS or PFCs) in site soils and groundwater. The field investigation was to commence in 2018.

For additional information on previous soil sampling data within the project limits, refer to the project's sampling report, and the HDR Engineering, Inc. *Gannon and Scott site* report (TRACS 10 MA 146 H5454 01E) dated October 25, 2007 (sampled August 2006), which is on file with ADOT.

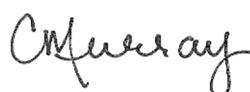
6 CONCLUSIONS AND RECOMMENDATIONS

ACS has the following conclusions and recommendations regarding this project:

- Since project construction will impact load-bearing concrete structures and painted surfaces, ACS recommends that potentially impacted material be sampled for asbestos-containing material and lead-based paint prior to disturbance;
- ACS recommends an additional file review for an open LUST case at Arizona Auto Auction (3420 S. 48th Street, Phoenix, AZ 85040) in order to locate the contamination boundary;
- While the risk associated with Orbital Industrial Services and Maintenance and Cutter Aviation Inc. may be minimal based on their generator status (CESQG) and location within the buffer, ACS considers these sites a concern if acquisition or disturbance is anticipated, based on the current associated violations at the properties;
- While the risk associated with 3002 E. Old Tower Road, Phoenix, AZ 85034 may be minimal based on its location within the buffer, ACS considers it a concern if acquisition or disturbance is anticipated, based on repeated releases at the facility over several years;
- Due to the lack of information for the current status of the contamination associated with the U of A Cotton Center Washing Sump (4201 E. Broadway Road, Phoenix, AZ 85040), ACS recommends that if disturbance occurs in the area (not currently anticipated), contractors be made aware of and report any indication of suspected contaminated soil. If the ground disturbance locations or project scope of work change, a reevaluation of potential concern may be necessary and care should be taken if acquisition is anticipated at this property;
- Due to the active AZ VCP and unknown contamination status at Stone Net, Inc. (2635 S. 24th Street, Phoenix, AZ 85034), ACS recommends that if disturbance occurs in the area, contractors be made aware of and report any indication of suspected contaminated soil. If the ground disturbance locations or project scope of work change, a reevaluation of potential concern may be necessary;
- Due to the ongoing investigation at the 161st Air National Guard Superfund site, ACS recommends that additional file review be conducted when the final project footprint and areas of disturbance, particularly within the Salt River, are identified; and
- Avoidance or proper abandonment of wells that may be impacted by construction located within the project limits is required.



Ashton Koons, B.S.S.
Environmental Scientist



Colleen Murray, M.S.T., ASP
Project Manager/Health and Safety
Specialist

REFERENCES

- ADEQ Arizona Department of Environmental Quality, eMaps online mapping tool. Accessed January 18, 2019. <https://gisweb.azdeq.gov/arcgis/emaps/?topic=ust>
- ADWR Arizona Department of Water Resources, Phoenix AMA Hydrology. Accessed March 4, 2019. <http://www.azwater.gov/AzDWR/StatewidePlanning/WaterAtlas/ActiveManagementAreas/Hydrology/PhoenixAMA.htm>.
- CFR 1986a Code of Federal Regulations. November 1986. 33 CFR 328. *Definition of waters of the United States*.
- CFR 1986b Code of Federal Regulations. November 1986. 33 CFR 329. *Definition of navigable waters of the US*.
- Hennings and Kading 2007 HDR Engineering, Inc., *Gannon and Scott Site* report. October 25, 2007.
- EDR 2019 Environmental Database Resources, Inc. Radius Report Inquiry Number 5561873.3s. February 13, 2019.
- NEPAssist The US Environmental Protection Agency's (EPA's) online database. <https://www.epa.gov/nepa/nepassist>

APPENDIX A: PISA FORM

Preliminary Initial Site Assessment (PISA) Form I-10, I-17 (Split) to SR 202L (Santan) Project									
Federal Project No.	NH-010-C(220)T				ADOT Project No.	010 MA 150 F0072 01D			
<p>Brief Project Description: The Arizona Department of Transportation (ADOT), in cooperation with the Federal Highway Administration (FHWA), is planning to improve a segment of Interstate 10 (I-10) from the I-10, Interstate 17 (I-17) (Split) Traffic Interchange (TI), milepost (MP) 149.5, to the State Route Loop 202 (SR 202L) Santan Freeway, MP 160.9. The purpose of the I-10, I-17 (Split) to SR 202L (Santan) improvement project is to enhance operational characteristics, as well as mobility of regional and local traffic.</p> <p>The increasing traffic demand is causing the I-10 corridor and adjacent local arterial street system to become congested during the morning and evening peak travel periods. Future traffic volume projections indicate the congestion will worsen, causing further travel delays and increase travel times for those using the I-10 corridor. Increased congestion on I-10 will cause travelers to divert their trips to other freeway corridors and the local arterial street system, causing these transportation facilities to become increasingly congested as well. Improvements to the I-10 corridor are necessary to increase the freeway capacity and help alleviate increased levels of traffic congestion on all components of the overall transportation system in the project area.</p> <p>The goal of this proposed project is to increase the capacity of the I-10 corridor in accordance with the approved regional and local transportation plans. This project would also seek to optimize the traffic operations within the corridor for the projected Design Year 2040 traffic demand, to retain local access at existing traffic interchanges, and to minimize or mitigate impacts the improvements could have on the surrounding community. The approximate maximum depth of excavation for this project would be 160 feet for geotechnical investigation.</p>									
Section I: Site Location Information									
Assessor Parcel No.	Not applicable or not available (N/A)				ADOT Parcel No.	N/A			
Address/Route & Milepost		I-10 from the I-10, I-17 (Split) TI MP 149.5 to the SR 202L, MP 160.9, State Route (SR) 143 from Broadway Road MP 000.25 to just south of the south bank of the Salt River MP 001.3, and US 60 from I-10 MP 172.0 east to Hardy Drive MP 173.0.							
Section	14, 23, & 24; 17-20, 29, 32, & 33;	Township	1 N 1 S	Range	3 E 4 E		1/4	1/4	1/4

	5, 8, 17, 20 & 29								
Latitude/Longitude: northernmost limit		N 33°25'48.9", W 111°58'41.2"		Latitude/Longitude: southernmost limit		N 33°18'30.1", W 111°58'20.4"			
Site Characteristics: Past Land Use									
Agriculture		Residential	X	Commercial	X	Industrial	X	Natural	X
Vehicle Maintenance:		X	Chemical Storage:		X	UST System:		X	
Septic System:			Water/Dry Well:		X	Pesticide/Herbicide			
Other:		Public parks, golf resort, baseball field, inert landfill, airport, and schools.							
Section II: Site Surface Conditions									
Dimensions:		Length	13.45 miles		Width	varies			
Area: N/A		Sq. feet or		Sq. meters or		Acres			
Topography:		The project corridor crosses the Salt River and is north/northeast of the South Mountain range. The elevation in the project area ranges from approximately 1,058 to 1,288 feet above mean sea level.							
Geology:		The majority of the project area consists of late and middle Pleistocene surficial deposits containing poorly sorted sand and gravel, and Holocene surficial deposits containing fine-grained well-sorted sediment. There are a few small sections within the project area along I-10 that contains middle Miocene to Oligocene granite and volcanic rocks. The project area lies within the Luke Basin, Tempe Buttes, South Mountains, and Gilbert area of the Basin and Range physiographic province. The project area is located in the Arizona Department of Water Resources (ADWR) Phoenix Active Management Area (AMA), East and West Salt River Valley Sub Basins, of the Salt River and Upper Gila River Surface Water Drainage basins. Groundwater depth in the project area ranges from 80-205 feet below ground surface.							
Vegetation:		Native vegetation, weeds, and landscaping.							
Structures:		Drainage structures, pedestrian bridges, TIs, guardrails, residential, commercial, industrial, baseball field, airport, and school buildings.							

Utilities:	Aboveground and buried electrical, buried fiber optic, natural gas pipeline, water and sewer utilities.
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Section III: Results of Database Review










The February 13, 2019 corridor regulatory database search report indicated findings within the project area. Archaeological Consulting Services, Ltd. (ACS) evaluated the database report and reached the conclusions presented in Table 1, found in Appendix B. The locations of the sites listed in Table 1 are shown on the maps in the Environmental Data Resources, Inc. (EDR) corridor database search report included in Appendix C. The EDR maps also depict the approximate boundaries of the project footprint and the 0.25-mile buffer. In some instances, ACS identified discrepancies between the EDR report and the current status of a site. As a result, ACS also conducted a review of the Arizona Department of Environmental Quality (ADEQ) eMaps, the US Environmental Protection Agency's (EPA's) NEAssist, and Enforcement Compliance History Online (ECHO) websites. The most up-to-date information is presented in Table 1.

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- As of January 10, 2019 a LUST case was closed at the Circle K Store #2709 located at 5105 E. Elliot Road, Phoenix, AZ 85044 (property was identified in a previous PISA completed for the project). The releases were associated with gasoline, and the estimated contamination boundary was located near the southwestern portion of the property, and did not extend into the roadways (Elliot Road or 51st Street). Based on the closed status of the LUST case, this property should not impact the project as currently scoped; and
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No concerns on project		Concerns on project	X	
(Complete Section IV)				
Section IV: Hazardous Materials Concerns				
Observed:	<p>Based on the current assessment of the project area and a review of previous reports, ACS has the following hazardous materials concerns regarding this project:</p> <ul style="list-style-type: none"> • Arizona Auto Auction is located on the boundary of the project footprint and buffer and has an associated open LUST case. Given that the contamination has not been defined, ACS considers this site a concern; and • ACS considers the following potential concerns if acquisition or disturbance is anticipated at the properties: <ul style="list-style-type: none"> ▪ Orbital Industrial Services and Maintenance (4024 E. Broadway Road, Phoenix, AZ 85040) is a Resource Conservation and Recovery Act (RCRA) Conditionally Exempt Small Quantity Generator (CESQG) with current violations; ▪ Cutter Aviation Inc. (2802 Old Tower Road, Phoenix, AZ 85034) is a RCRA CESQG with current violations; ▪ At 3002 E. Old Tower Road, Phoenix, AZ 85034 (no associated facility name), there were 46 Hazardous Materials Information Resource System (HMIRS) incidents reported. In addition, this location is adjacent to 161st Air National Guard, a Department of Defense (DOD) Superfund site; ▪ University of Arizona (U of A) Cotton Center Washing Sump (4201 E. Broadway, Road Phoenix, AZ 85040) is listed with an associated Declaration of Environmental Use Restriction (DUER) and Voluntary Environmental Mitigation Use Restriction (VEMUR), with remediation completed in 1999 and 2004. However, the EDR listing identifies that the facility withdrew their request to be included in the Arizona Voluntary Cleanup Program (VCP), and that the site did not want to pursue No Further Action (NFA) status. Association with the VCP ceased at that point, and no additional information as to the status of the contamination on-site was available; ▪ Stone Net, Inc. (2635 S. 24th Street, Phoenix, AZ 85034) is an active AZ VCP site, associated with soil and groundwater contamination consisting of jet fuel, mineral spirits, Stoddard solvent, and chlorinated hydrocarbons; and ▪ 161st Air National Guard DOD Superfund site currently under investigation for the potential presence of Per- and Polyfluoroalkyl 			

	<p>Substances (PFAS or PFCs) in site soils and groundwater. The field investigation was to commence in 2018.</p> <p>For additional information on previous soil sampling data within the project limits, refer to the project's sampling report, and the HDR Engineering, Inc. <i>Gannon and Scott site</i> report (TRACS 10 MA 146 H5454 01E) dated October 25, 2007 (sampled August 2006), which is on file with ADOT.</p>
Suspected:	None
Unusual Conditions:	None
Section V: Conclusions and Recommendations	
<p>ACS has the following conclusions and recommendations regarding this project:</p> <ul style="list-style-type: none"> • Since project construction will impact load-bearing concrete structures and painted surfaces, ACS recommends that potentially impacted material be sampled for asbestos-containing material and lead-based paint prior to disturbance; • ACS recommends an additional file review for an open LUST case at Arizona Auto Auction (3420 S. 48th Street, Phoenix, AZ 85040) in order to locate the contamination boundary; • While the risk associated with Orbital Industrial Services and Maintenance and Cutter Aviation Inc. may be minimal based on their generator status (CESQG) and location within the buffer, ACS considers these sites a concern if acquisition or disturbance is anticipated, based on the current associated violations at the properties; • While the risk associated with 3002 E. Old Tower Road, Phoenix, AZ 85034 may be minimal based on its location within the buffer, ACS considers it a concern if acquisition or disturbance is anticipated, based on repeated releases at the facility over several years; • Due to the lack of information for the current status of the contamination associated with the U of A Cotton Center Washing Sump (4201 E. Broadway Road, Phoenix, AZ 85040), ACS recommends that if disturbance occurs in the area (not currently anticipated), contractors be made aware of and report any indication of suspected contaminated soil. If the ground disturbance locations or project scope of work change, a reevaluation of potential concern may be necessary and care should be taken if acquisition is anticipated at this property; • Due to the active AZ VCP and unknown contamination status at Stone Net, Inc. (2635 S. 24th Street, Phoenix, AZ 85034), ACS recommends that if disturbance occurs in the area, contractors be made aware of and report any indication of suspected contaminated soil. If the ground disturbance locations or project scope of work change, a reevaluation of potential concern may be necessary; 	

<ul style="list-style-type: none"> • Due to the ongoing investigation at the 161st Air National Guard Superfund site, ACS recommends that additional file review be conducted when the final project footprint and areas of disturbance, particularly within the Salt River, are identified; and • Avoidance or proper abandonment of wells that may be impacted by construction located within the project limits is required. 																							
<table border="1"> <tr> <td>High Priority Phase 1:</td> <td></td> <td>Medium Priority Phase 1:</td> <td></td> <td>Low Priority Phase 1:</td> <td></td> </tr> </table>						High Priority Phase 1:		Medium Priority Phase 1:		Low Priority Phase 1:													
High Priority Phase 1:		Medium Priority Phase 1:		Low Priority Phase 1:																			
<table border="1"> <tr> <td>No additional survey required:</td> <td></td> <td></td> <td>ADEQ File Review:</td> <td>X</td> <td></td> </tr> </table>						No additional survey required:			ADEQ File Review:	X													
No additional survey required:			ADEQ File Review:	X																			
Section VI: Comments																							
<table border="1"> <tr> <td>Consultant Name</td> <td>Ashton Koons, B.S.S.</td> <td>Signature</td> <td></td> <td>Date</td> <td>April 1, 2019</td> </tr> <tr> <td>Consultant Name</td> <td>Colleen Murray, M.S.T., ASP</td> <td>Signature</td> <td></td> <td>Date</td> <td>April 1, 2019</td> </tr> <tr> <td>ADOT</td> <td>Ed Green</td> <td>Signature</td> <td></td> <td>Date</td> <td>02 Apr 19</td> </tr> </table>						Consultant Name	Ashton Koons, B.S.S.	Signature		Date	April 1, 2019	Consultant Name	Colleen Murray, M.S.T., ASP	Signature		Date	April 1, 2019	ADOT	Ed Green	Signature		Date	02 Apr 19
Consultant Name	Ashton Koons, B.S.S.	Signature		Date	April 1, 2019																		
Consultant Name	Colleen Murray, M.S.T., ASP	Signature		Date	April 1, 2019																		
ADOT	Ed Green	Signature		Date	02 Apr 19																		

APPENDIX B: TABLE 1 – DATABASE REPORT FINDINGS SUMMARY

Table 1: Database Report Findings Summary

Database	Sites listed in EDR	Sites Located in Project Footprint	Sites Located in 0.25-mile Buffer	Additional Information	Potential Hazardous Materials Concern
UST	117	4	113	UST Active (footprint): 1 UST Active (buffer): 15	Of the 16 active USTs, 14 should not impact the project as currently scoped based on the lack of an associated release. The remaining two sites are associated with LUST cases: one is within the footprint and the other is within the buffer. For information on the remaining two sites, refer to the LUST section below.
				UST Removed (footprint): 3 UST Removed (buffer): 98	Based on the tank removals, the sites should not impact the project as currently scoped. However, one of the sites is associated with a LUST case. See the LUST section below for additional information.
LUST	61	4	57	Open LUST Case (footprint): 0 Open LUST Case (buffer): 1	Regulatory file review was conducted for the open LUST site, Arizona Auto Auction site; the site is located on the boundary of the project footprint and buffer. This site is considered a concern based on the lack of a defined contamination boundary and proximity to potential ground disturbance and/or acquisition. See the file review section above for additional information.
				Closed LUST Cases (footprint): 4 Closed LUST Cases (buffer): 56	Based on the closed status of the sites, they should not impact the project as currently scoped. Regulatory file review was conducted for two of the sites located within the footprint based on the recommendation of a previous hazardous materials report for the project. See the file review section for additional information.

Database	Sites listed in EDR	Sites Located in Project Footprint	Sites Located in 0.25-mile Buffer	Additional Information	Potential Hazardous Materials Concern
RCRA	91	LQG: 2 SQG: 2 CESQG: 1	LQG: 8 SQG: 28 CESQG: 50	Sites with Violations (footprint): 1 LQG, and 1 SQG Sites with Violations (buffer): 6 LQGs, 7 SQGs, and 6 CESQGs	Upon review of Enforcement Compliance History Online (ECHO) websites only two of the facilities were found to have current violations. RCRA sites with no current violations (89 of the 91 sites listed) should not impact the project as currently scoped (current violation status was confirmed on NEPAassist). The remaining two facilities, Cutter Aviation Inc. (2802 Old Tower Road, Phoenix, AZ 85034) and Orbital Industrial Services and Maintenance (4024 E. Broadway Road, Phoenix, AZ 85040) are CESQGs with current violations. While the risk associated with these sites may be minimal based on their generator status and location within the buffer, ACS considers these sites a concern if acquisition or disturbance is anticipated based on the current associated violations at the property.
SEMS-Archive	9	0	9	Based on their NFRAP status, the sites should not impact the project as currently scoped.	
Drycleaners	14	0	14	Based on the location within the buffer, and lack of any other associated listings, these sites should not impact the project as currently scoped.	
HMIRS	63	0	63	Based on the dates of the incidents and likely immediate response, 17 of these listings should not impact the project as currently scoped. However, 46 incidents were reported at 3002 E. Old Tower Road, Phoenix, AZ (no facility name provided), which is adjacent to the 161st Air National Guard DOD Superfund site. While the risk associated with this site may be minimal based on its location within the buffer, ACS considers it a concern if acquisition or disturbance is anticipated, based on repeated releases at the facility over several years.	
AZURITE	10	0	10	Information related to the AZURITE listings can be found in the other, more specific databases. Refer to the RCRA, LUSTs, AZ VCPs, and AZ AULs sections for additional information.	

Database	Sites listed in EDR	Sites Located in Project Footprint	Sites Located in 0.25-mile Buffer	Additional Information	Potential Hazardous Materials Concern
AZ AUL	3	0	3	<p>The Crest Steel Corp (4543 E. University Drive, Phoenix, AZ 85034) has two associated VEMURs related to the site's closed LUST cases, with remediation completed in 1994 and 1997. Based on the closed status of the LUST cases, and distance from the project footprint, this site should not impact the project as currently scoped.</p> <p>Riverpoint Lot 2 (4050 S. Riverpoint Parkway, Phoenix, AZ 85040) is listed with an associated DEUR, with remediation completed in 2009. See the AZ VCP section below for additional information.</p> <p>University of Arizona (U of A) Cotton Center Washing Sump (4201 E. Broadway Road, Phoenix, AZ 85040) is listed with an associated DUER and VEMUR, with remediation completed in 1999 and 2004. See the AZ VCP section below for additional information.</p>	
AZ VCP	8	0	8	<p>The Riverpoint Lot 2 site was issued conditional No Further Action (NFA) and closure in December 2012. Based on the status of the site, it should not impact the project as currently scoped.</p> <p>The U of A Cotton Center Washing Sump EDR listing identifies that the facility withdrew their request to be included in the VCP, and that the site did not want to pursue NFA status. Association with the VCP ceased at that point, and no additional information as to the status of the contamination on-site was available. While the risk associated with this site is minimal based on its location within the buffer, ACS considers it a concern if acquisition or disturbance is anticipated, based on the unknown status of the on-site contamination.</p> <p>Stone Net, Inc. (2635 S. 24th Street, Phoenix, AZ 85034) is listed as an active facility with soil and groundwater contamination, including jet fuel, mineral spirits, Stoddard solvent, and chlorinated hydrocarbons. No remediation date or additional investigation dates are listed. ACS considers this site a concern if acquisition or disturbance is anticipated, based on the unknown status of on-site contamination.</p> <p>The remainder of the site cases are closed, or were referred to other programs. Based on their status, they should not impact the project as currently scoped.</p>	
Spills	76	15	61	Based on the dates of the incidents (1984-2001) and likely immediate response, these listings should not impact the project as currently scoped.	
ERNS	29	4	26	Based on the likely immediate response to these incidents, the listings should not impact the project as currently scoped.	
Drywell	337	9	328	Avoidance or proper abandonment of drywells that may be impacted by construction located within the project limits is required.	

Database	Sites listed in EDR	Sites Located in Project Footprint	Sites Located in 0.25-mile Buffer	Additional Information	Potential Hazardous Materials Concern
Superfund (not listed in the EDR)	1		1	According to the ADEQ eMaps website, the 161st Air National Guard DOD Superfund site is located approximately 1,633 feet northeast of I-10 at milepost 150.7 (east of 24th Street). During 1988, this site became a part of the Irrigation Restoration Program (IRP), but remediation did not begin until 1990. The contaminants found in waste streams at the site consisted of paint thinners, oils, fuels, various solvents, and other chemicals associated with air fueling and ground maintenance activities. After years of multiple remediation techniques, the investigation into the extent of contamination is still active. In 2017, Perfluorinated Chemicals were being investigated within the subsurface soils and the groundwater. The Air National Guard developed a Work Plan to continue to investigate the potential presence of Per- and Polyfluoroalkyl Substances (PFAS or PFCs) in site soils and groundwater. The field investigation was to commence in 2018. Based on the continued investigation as to the extent of the on-site contamination, ACS considers the site a potential concern.	
UST: underground storage tank, LUST: leaking underground storage tank, RCRA: Resource Conservation and Recovery Act, LQG: Large Quantity Generator, SQG: Small Quantity Generator, CESQG: Conditionally Exempt Small Quantity Generator, NEPAassist: the US Environmental Protection Agency's (EPA's) online database, ACS: Archaeological Consulting Services, Ltd., SEMS-Archive: Superfund Enterprise Management System, NFRAP: No Further Remedial Action Planned, HMIRS: Hazardous Materials Information Resource System, DOD: Department of Defense, Interstate 10: I-10, AZURITE: Arizona Unified Repository for Informational Tracking of the Environment, AZ VCP: Arizona Voluntary Cleanup Program, AZ AUL: Arizona Activity and Use Limitation, VEMUR: Voluntary Environmental Mitigation Use Restriction, DEUR: Declaration of Environmental Use Restriction, ERNS: Emergency Release Notification System, and ADEQ: Arizona Department of Environmental Quality.					

APPENDIX C: EDR CORRIDOR REGULATORY DATABASE SEARCH REPORT (FEBRUARY 13, 2019)
