#### FORMER WILLIAMS AIR FORCE BASE SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY PARCEL K-1-2, FEBRUARY 2019

#### **EXECUTIVE SUMMARY**

A Supplemental Environmental Baseline Survey (SEBS) was conducted by the Air Force Civil Engineer Center (AFCEC) to document the environmental condition of Parcel K-1-2 at the former Williams Air Force Base (Williams AFB), Arizona. Parcel K-1-2 may hereinafter be referred to as the "Property". The SEBS is prepared in support of prospective property transfer of Parcel K-1-2 to Arizona State University (ASU).

The SEBS was conducted to update and refine the findings of the Williams AFB Basewide Environmental Baseline Survey (Basewide EBS), dated December 1993, the SEBS for Parcels K and K-1, dated December 1996 (Parcel K/K-1 SEBS), and the SEBS for Parcel K-1-2 SEBS (Easements), dated March 2011. This SEBS includes a review of historical Resource Conservation and Recovery Act (RCRA) investigations and assessment reports, Installation Restoration Program (IRP) studies, underground storage tank (UST) investigations, Environmental Compliance Assessment and Management Program reports/findings, National Environmental Policy Act (NEPA) documentation, and visual site inspections (VSIs). The SEBS includes an evaluation of known or potential sources of contamination on the subject Property and on adjacent property known to have historically impacted or currently impact the Property.

A confirmatory VSI of the Property was conducted on 6 September 2018 in support of a Finding of Suitability to Transfer (FOST), and to determine if any changes in Property condition had occurred since the prior Basewide EBS and SEBSs.

Based on information reviewed for this SEBS, the affected Property area is suitable for transfer. The Property is categorized under the Department of Defense (DoD) Environmental Condition Category (ECC) as an overall Category 4, which denotes areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

### **1.0 INTRODUCTION**

## 1.1 BACKGROUND

The former Williams Air Force Base (Williams AFB or Williams) is located in Mesa, Maricopa County, Arizona (AZ) approximately 30 miles southeast of Phoenix. It is identified in the National Superfund Database as Site AZ 7570028582. The former base lies within the municipal boundaries of the City of Mesa, adjacent to the towns of Gilbert, Chandler, and Queen Creek and portions of unincorporated Maricopa County, see **Attachment 1, Figure 1**.

Williams AFB opened in 1942 and was immediately commissioned as a flight training school. Pilot training was the primary activity at former Williams AFB throughout its history. At various times, bombardier, bomber pilot, instrument bombing specialist, and fighter gunnery training schools were also housed on the base. Over the years, a wide variety and large number of aircraft were stationed at former Williams AFB. Support facilities included the aircraft fuel storage and dispensing area, flight-line maintenance and repair hangars, an aircraft chemical cleaning/plating shop, oil/water separators (OWS), and various underground storage tanks (USTs). The former base also provided maintenance and services for its administrative buildings and military housing. These services included a domestic water supply, waste water disposal, refuse disposal, repairs, pest control, and painting.

The former Williams AFB occupied 4,043 acres surrounded primarily by agricultural land. As part of the Department of Defense (DoD) wide Base Realignment and Closure (BRAC) program, the former Williams AFB was closed in 1993. The majority of the base property has since been converted to the Phoenix-Mesa Gateway Airport (formerly Williams Gateway Airport) and related aviation industrial/commercial facilities, Arizona State University (ASU) Polytechnic Campus, the Maricopa County Community College Williams Campus, and several other smaller entities.

#### **1.2 PURPOSE**

This Supplemental Environmental Baseline Survey (SEBS) was conducted to document the environmental condition of real property and facilities on Parcel K-1-2 (hereinafter referred to as the "Property") at the former Williams AFB in support of property transfer under a U.S. Department of Education (DoED) sponsored Public Benefit Conveyance (PBC) to ASU Polytechnic Campus, Mesa, Arizona. The decision for Parcel K-1-2 property transfer was determined in the Final Record of Decision for Disposal and Reuse of Williams AFB and associated Supplemental Records of Decision (U. S. Air Force, February 1995, August 1995, 1997, 1998, and 2001). Pending transfer, the Property is currently licensed to ASU.

The Parcel K-1-2 SEBS evaluates available data related to the environmental condition of the Property and its vicinity and updates and refines the findings of the *Basewide Environmental Baseline Survey* (Basewide EBS), Williams AFB (Halliburton NUS Corporation, 1993), the *Supplemental EBS for Parcels K and K-1* (Parcel K/K-1 SEBS) (Air Force Base Conversion Agency [AFBCA], 1996), and the *SEBS for Parcel K-1-2* (Easements) (Air Force Civil Engineering Center [AFCEC, 2011). This SEBS included a review of historical Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) investigations and assessment reports, the *Final Environmental Impact Statement* (FEIS) (Halliburton NUS

Corporation, 1994), the Installation Restoration Program (IRP), the Military Munitions Response Program (MMRP), UST investigations, aboveground storage tank (AST) investigations, asbestos and lead-based paint (LBP) surveys, on-going emerging contaminant investigations, as well as federal, state and local documentation, and VSIs. In addition, the SEBS included an evaluation of known or potential sources of contamination on adjacent property known to have historically impacted or to currently impact the Property. Review of adjacent properties within a quarter mile of the Property included documents associated with IRP sites, MMRP sites, leaking petroleum storage tanks, OWSs, wash racks, septic tanks, and silver recovery units (SRUs) within a quarter mile of the Property, and all USTs within 500 feet of the Property.

# **1.3 PROPERTY DESCRIPTION**

The Property consists of approximately 1.78 acres located in the central eastern area of the former Williams AFB as shown on the Property Location Map, **Attachment 1, Figure 2**. Parcel K-1-2 is located east of South Sagewood, (formerly 12<sup>th</sup> Street), north of Unity Avenue (formerly B Street), and west of Innovation Way (formerly 11<sup>th</sup> Street). The Property was originally identified as Parcel K-1 but was excluded from the transfer of Parcel K to City of Mesa completed in January 2000. The Property corresponds to Maricopa County Assessor Parcel Number 304-50-003-D located at 7038 East Unity Avenue, Mesa, AZ.

# 2.0 SURVEY METHODOLOGY

# 2.1 DESCRIPTION OF DOCUMENTS REVIEWED

The data used in this SEBS were based on a review of the Basewide EBS, the FEIS, the Parcel K/K-1 SEBS, Parcel K-1-2 SEBS (Easements), VSI reports, remedial investigation (RI) reports, decision documents, regulatory concurrence letters, and other documents. A list of the documents reviewed for this report is located in **Attachment 2**. Documents available on the Former Williams AFB Administrative Record (AR) are referenced in **Attachment 2** and can be accessed by entering the AR document number in the search box titled "Full Metadata Search" at the following website:

http://afcec.publicadmin-record.us.af.mil/Search.aspx.

# 2.2 INSPECTION OF PROPERTIES

VSIs of the interior and exterior of facilities located on the Property were conducted during the preparation of the Basewide EBS, Parcel K/K-1 SEBS, and Parcel K-1-2 SEBSs. A confirmatory VSI of the Property, provided in **Attachment 3**, was conducted for this SEBS on 6 September 2018 in support of a Finding of Suitability to Transfer (FOST), and to document changes in Property condition that may have occurred since the Basewide EBS and prior SEBSs.

# 3.0 UPDATED FINDINGS FOR PARCEL K-1-2

This section summarizes information and findings based on the VSIs and data review to document changes that may have occurred since the issuance of the Basewide EBS and Parcel K/K-1/K-1-2 (Easements) SEBSs. This updated information is used to evaluate the current environmental condition of the Property and its vicinity.

#### 3.1 HISTORY AND CURRENT USAGE

Historic use of the Property consisted of a former base potable water distribution system including a well, a water tower and storage tanks, distribution lines, and related facilities. Former Base Production Well 6 (BPW6) was decommissioned in 1997 (IT Corporation [IT], 2000) and the former base potable water distribution system was decommissioned in 2001 (U. S. Air Force, 2001). Former paint and pesticide shops (Facilities 722 and 723) were located in the northeast corner of the Property prior to 1980. A former interior fenced area within the Property was used as a military dog work area. In 2011, the City of Mesa was granted a perpetual public right-of-way for maintenance of Innovation Way and a water system public utility easement in the southeast corner of the Property. Currently, the Property is fenced and has a locked gate.

The Property includes three existing facilities that are proposed for transfer. **Table 3-1** is a summary of Air Force facilities currently within the boundaries of the Property and includes information regarding date of construction, square footage, and historical use. **Table 3-1** also includes similar information for Air Force facilities removed or decommissioned since the Basewide EBS and Parcel K/K-1 SEBS. Facilities currently and formerly located on the Property are shown in **Attachment 1, Figure 3**.

Facility (Use)	Year	Size	HM <sup>1</sup>	Tanks <sup>2</sup>	ACM <sup>3</sup>	LBP <sup>4</sup>
	Constructed					
Existing						
707 (Water Tank)	1952	836,000	NR	AST	NR	Р
		gallons				
715 (Pump Station)	1943	1762 ft <sup>2</sup>	Y	AST(2)/UST	NF	Р
716 (Maintenance)	1983	320 ft <sup>2</sup>	Y	No	NR	NR
<b>Removed/Decommission</b>	ed					
708 (Base Production	1961	NA	NR	No	NR	Р
Well 6 (BPW6),						
decommissioned 1997)						
714 (Water Tank,	1943	200,000	NR	AST	NR	Р
removed 2013)		gallons				
722 (Former	Unknown	$1844 \text{ ft}^2$	Y	No	NR	Р
Pesticide/Paint shop,		(est.)				
removed pre-1980)						
723 (Former	Unknown	300 ft <sup>2</sup>	Y	No	NR	Р
Pesticide/Paint shop,		(est.)				
removed pre-1980)						
724 (Water Tank,	1943	500,000	NR	AST	NR	Р
removed 2013)		gallons				

Table 3-1 Summary of Existing and Removed/Decommissioned Air Force Facilities in
Parcel K-1-2

Notes:

<sup>1</sup>HM- Indicates that hazardous materials were known to be stored in this facility. (Y = Yes, NR = Not Reported) <sup>2</sup>Tanks- Indicates tanks were associated with the facility (e.g., aboveground storage tank (AST) or underground storage tank (UST)). Information on the former tanks listed for Facility 715 is provided in Section 3.1.3.

 $^{3}$ ACM- Indicates that, based on the Basewide EBS, asbestos containing materials were used in the construction of this facility. (NF = Non-friable, NR = Not Reported)

<sup>4</sup>LBP- Indicates that, based on the Basewide EBS, lead based paint may have been used within this facility due to its date of construction (i.e., before 1978). (P = Possible, NR = Not Reported)

The City of Mesa has water system piping and appurtenances located within a public utility easement area in the southeast corner of the Property. Facilities located on the Property in association with the current ASU license include the following cellular company equipment: two pre-fabricated concrete structures and telecommunications antennae mounted on the water tower (Facility 707). The two structures are for telecommunications equipment and emergency back-up power generation. The emergency back-up power generation structure includes a 210-gallon diesel tank with secondary containment and leak detection (Verizon Wireless, 2019). Hazard notification signs (radio frequency hazard) for the antennae are posted on the Property fence. ASU maintains environmental compliance of its use of the Property as a condition of the license. Facilities and equipment owned by others are not included in the planned transfer of Air Force property.

## 3.2 ENVIRONMENTAL SETTING

The former Williams Air Force Base (AFB) is located approximately 30 miles southeast of Phoenix, AZ, in the Higley Basin of the Salt River Valley Basin see **Attachment 1, Figure 1**. The Salt River Valley Basin is part of the Basin and Range Physiographic Province, characterized by north to northwestward-trending wide, flat alluvial-filled basins that surround the separate steep, rugged, low-relief mountain ranges. The basin is bounded by the McDowell, Usery, Superstition, San Tan, South, and Phoenix Mountains. The former Williams AFB is drained by the Gila River, which is a tributary of the Colorado River. The Gila originates in southwest New Mexico and flows generally westward to its confluence with the Colorado River near Yuma, AZ. The Gila is approximately 15 miles to the south of the former AFB. The Salt River, a major tributary of the Gila, flows approximately 13 miles north of the former AFB. Flow in the Gila and Salt Rivers is intermittent in the region.

This section provides summary information for the hydrogeology, floodplains, biological and cultural resources, and utilities for the Property.

# 3.2.1 Hydrogeology

Groundwater elevation contour maps for areas of the former Williams AFB have been presented in groundwater monitoring reports for IRP sites ST035 (Former Base Gas Station northeast of Parcel K-1-2) (AMEC Foster Wheeler Environment and Infrastructure, Inc. [AMEC], February 2017), ST012 (centrally located bulk fuel storage area) (AMEC, April 2017), SS017 (Old Pesticide/Paint Shop within the Property) (AMEC, May 2018, September 2018), and LF004 (former base landfill on southern base perimeter) (AMEC, August 2017). The IRP groundwater monitoring reports indicate that groundwater generally flows in an easterly direction on a basewide scale. Groundwater measurements for October 2017 and January 2018 at Site SS017 indicate groundwater depth of approximately 131 feet (ft) below ground surface (bgs) and an easterly groundwater flow direction, see Attachment 1, Figure 4. A general rise in groundwater elevations has been observed from December 1989 to present and may be attributed to a decrease in local pumping due to urbanization, greater use of surface water, and increased recharge from agricultural irrigation and water recovery efforts. General seasonal fluctuations in groundwater elevation across the former Base indicate highest groundwater levels in late winter and early spring and lowest groundwater levels in summer and fall, which coincides with the pumping schedules of agricultural wells and groundwater recharge.

## 3.2.2 Floodplains

There is no change from the Basewide EBS. This Property is not located within the 100-year floodplain.

## **3.2.3** Biological, Cultural Resources

**Biological Resources:** There is no designated critical habitat, as defined by the Endangered Species Act, present at the former Williams AFB (IT, 1993). Based on the *Operable Unit-6 Feasibility Study* (OU-6 FS) (IT, 2000), "individual sites in OU-6 are very small and occupy disturbed and/or landscaped areas not supportive of wildlife". None of the sites in OU-6, which includes IRP Site SS017, occur in wetlands or other habitats identified in the basewide ecological risk assessment (IT, 1993). The Property consists of an unpaved fenced area within a developed campus, light industrial, and mixed-use area. No endangered, threatened, or other special status species or protected habitats are located within the boundaries of the Property.

**Cultural Resources:** A basewide archeological survey was completed in 1994 (SWCA, 1994). Based on the findings of the survey, the Air Force, Arizona State Historic Preservation Officer, and Advisory Council on Historic Preservation entered into a *Programmatic Agreement for the Disposal of Williams AFB* (U. S. Air Force, 1995) concerning historic properties included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). Pursuant to the Programmatic Agreement, the Air Force prepared the *Treatment Plan for Archaeological Resources and Historic Structures and Buildings at Williams Air Force Base* (Treatment Plan) (SWCA, 1995).

No traditional or sacred Native American sites were identified or are known to be located on the Property. The Treatment Plan identifies Facility 715, Pump Station, and Facility 707, Water Tank, as historic properties eligible for the NRHP. In accordance with the Programmatic Agreement and the Treatment Plan, the Property is subject to the following requirements in regard to conveyance via a Public Benefit Transfer: 1) a Preservation Covenant consistent with Appendix 3 of the Programmatic Agreement; 2) notifications, agreement by transferee, and consultation in accordance with stipulations of the Programmatic Agreement; and, 3) restrictions specified in the Treatment Plan, Section 8 (Treatment Plan for Historic Buildings and Structures).

## 3.2.4 Utilities

The potential for variation in the type and location of subsurface utilities from those indicated on available utility maps exists at the former Williams AFB. All areas within the boundaries of the former base have the potential for containing buried utility lines not indicated on maps utilized for locating subsurface utilities.

**Water Supply.** The City of Mesa owns and operates the water supply and distribution system for the former Williams AFB. The City of Mesa obtains its water primarily from the Salt River Project (SRP, Salt and Verde River watersheds) and the Central Arizona Project (Colorado River).

**Wastewater.** The City of Mesa owns and operates the wastewater treatment system for the former Williams AFB.

**Storm Water.** The Property is flat with a slight decrease in elevation from east to west. A system of underground drainage structures and open drainage ditches throughout the area conveys storm water runoff to regional drainages such as the Roosevelt Canal located west of the former base.

Electricity. Former Williams AFB is provided electric power by SRP Electric.

**Natural Gas.** Natural gas is delivered and distributed to former Williams AFB through the Southwest Gas Company system.

**Solid Waste.** Solid waste disposal services for the former Williams AFB are provided by City of Mesa.

## 3.3 PROPERTY CATEGORIZATION FACTORS

## 3.3.1 Hazardous Substances

## 3.3.1.1 Hazardous Materials/Petroleum Products Management

Hazardous substances in quantities exceeding 1,000 kilograms (kg), or the hazardous substances reportable quantity found at 40 Code of Federal Regulations (CFR) Part 302.4 (whichever is greater), were stored for one (1) year or more on the Property. In addition, hazardous substances were released to the soil in the area of BPW6 and the former pesticide shop (IRP Site SS017). Based on definitions provided in 40 CFR 373.4, no other storage, release, or disposal of hazardous substances has been identified on the Property. Accordingly, a "Notice of Hazardous Substance Stored" and a "Notice of Hazardous Substance Released" (ref. 40 CFR 373.1) for the Property are provided in **Attachments 4 and 5**, respectively.

#### 3.3.1.2 Hazardous Waste/Petroleum Waste Management

No hazardous waste or petroleum waste management occurs on the Property.

## 3.3.2 Installation Restoration Program (IRP) Sites and Areas of Concern

The IRP is an Air Force program to identify, characterize, and remediate past environmental contamination on its bases. IRP objectives include evaluation of past disposal and spill sites, containment of the migration of contaminants, and elimination of potential hazards to human health and the environment associated with contaminated sites. One IRP site (SS017) is located on the Property.

IRP Site SS017, the Old Pesticide/Paint Shop (Facility 722) including BPW6, is located on the Property (**Attachment 1, Figure 3**). IRP Site SS017 had not been designated or identified at the time of the Basewide EBS. Pesticides were stored and mixed at Facility 722 prior to 1960 and after 1960 the facility was also used to store paint until it was demolished around 1980. BPW6 was a base water supply well that had been inactive and was closed in 1997. During well closure,

it was determined that a polychlorinated biphenyl (PCB) capacitor associated with the well pump motor had leaked to the well pad and surrounding soil.

As reported in the Evaluation/Assessment Report (IT, 1994) and OU-6 RI Report (IT, 1999), the pesticide dieldrin was detected at IRP Site SS017 in surface and subsurface soil at concentrations that exceeded Arizona residential soil remediation levels (SRLs) (Arizona Administrative Code, Title 18, Chapter 7). In addition, PCBs were detected at the location of BPW6 in surface and subsurface soil above SRLs. The OU-6 FS evaluated remedial alternatives for IRP Site SS017 and determined that excavation with on-site bioremediation was the preferred alternative to address dieldrin-contaminated soil and excavation with off-site disposal was the preferred alternative for PCB-contaminated soil. Pursuant to the Final Action Memorandum, Spill Site 17 (SS-17) (BEM Systems, Inc., 2000), an excavation and disposal removal action was implemented in 2001 to address the dieldrin and PCBs in soil. The removal action excavation was intended to remove soils impacted by dieldrin or PCBs above the residential screening level to a maximum depth of four meters bgs. The dieldrin residential SRL was 0.28 milligrams per kilogram (mg/kg) at the time of the Removal Action and was changed to the current value of 0.34 mg/kg in 2007. The PCB residential SRL was 2.5 mg/kg at the time of the Removal Action and was changed to the current value of 1.1 mg/kg, also in 2007. Based on post-excavation sampling presented in the Revised Final OU-6 Removal Action Completion Report (URS Corporation, 2013), dieldrin at levels exceeding the SRL of 0.34 mg/kg remains on-site at depths greater than 4 meters bgs but no PCBs remain in soil above the SRL or federal PCB cleanup standard (1 mg/kg) allowing use of the site as a high occupancy area without further conditions (40 CFR 761.61) (AFCEC, 2018). The Removal Action Excavation Areas are shown in Attachment 1, Figure 5.

The Site SS017 and BPW6 selected remedies are documented in the *OU-6 Record of Decision* (ROD), (AFCEC, 2018). Based on the presence of dieldrin in groundwater monitoring results and in soils above Arizona residential SRLs at depths greater than four meters bgs, the remedy includes groundwater monitoring and land use controls (LUCs) for management of soil at SS017 below a depth of four (4) meters bgs. At the time of property transfer, deed environmental use restrictions and a Declaration of Environmental Use Restriction (DEUR) pursuant to State of Arizona requirements (Arizona Revised Statutes [A.R.S.] §§49-151 et seq) will be recorded to implement the LUCs as specified in the OU-6 ROD.

#### **3.3.2.1** Groundwater Contamination

Based on the presence of dieldrin in a groundwater grab sample obtained from a soil boring in 1996, additional groundwater investigations at IRP Site SS017 were conducted. Four groundwater monitoring wells were installed on the Property at Site SS017 in 1998, as shown in **Attachment 1, Figures 4 and 5**. Wells MW-1, MW-2, MW-3 and MW-4 were initially sampled and analyzed for pesticides four different times between their installation in February 1998 and October 1999. Periodic groundwater sampling and analysis was implemented in July 2001, subsequent to the soil removal action, and continues to the present. MW-14 from adjacent IRP Site ST035 was added as a downgradient monitoring well for Site SS017 in 2013. Site SS017 groundwater monitoring results are presented in **Table 3-2**. As shown in the table, results for some samples collected through January 2018 exceed the Environmental Protection Agency (EPA) Regional Screening Level (RSL) of 0.0018 microgram per liter ( $\mu$ g/L) (EPA, 2018) at

MW-2, MW-3 and MW-4. Original or duplicate results for the October 2017 and January 2018 MW-2 samples were slightly over the EPA Drinking Water Health Advisory of  $0.2 \mu g/L$ .

	Monitoring Well						
Date	<b>MW-01</b>	MW-02	<b>MW-03</b>	MW-04	<b>MW-14</b>		
Feb-98	0.05 U	0.05 U	0.05 U	0.05 U	NS		
Sep-98	0.05 U	0.05 U	0.05 U	0.05 U	NS		
Apr-99	0.023	0.02 U	0.02 U	0.016 J	NS		
Oct-99	0.02 U	0.019 U	0.014 U	0.02 U	NS		
Jul-01	0.007 U	0.007 U	0.007 U	0.007 U	NS		
Oct-01	0.007 U	0.007 U	0.007 U	0.007 U	NS		
Jan-02	0.007 U	0.007 U	0.007 U	0.007 U	NS		
Apr-02	0.004 U	0.004 U	0.018 F	0.004 U	NS		
Jul-02	0.004 U	0.006 F	0.005 F	0.004 U	NS		
Oct-02	0.004 U	0.004 U	0.004 U	0.004 U	NS		
Feb-03	0.003 U	0.003 U	0.037 F	0.012 F	NS		
Apr-03	0.003 U	0.008 F	0.059 F	0.017 F	NS		
Jul-03	0.003 U	0.009 F	0.020 F	0.009 F	NS		
Oct-03	0.003 U	0.007 F	0.027 FJ	0.009 F	NS		
Aug-04	0.004 U	0.004 U	0.004 U	0.004 U	NS		
Apr-05	0.001 U	0.001 U	0.014 F	0.001 U	NS		
Jul-06	0.006 U	0.0061 U	0.013 F	0.0061 U	NS		
Jun-07	0.0067 U	0.0064 U	0.011 F	0.0062 U	NS		
Jul-08	0.006 U	0.00612 U	0.00652 U	0.00645 U	NS		
Aug-09	0.000204 UJL	0.00311 JL	0.0316 J	0.00439 J	NS		
Aug-10	0.001 U	0.001 U	0.00364 J	0.001 U	NS		
Aug-11	0.000188U	0.0106	0.00444	0.0023	NS		
Aug-12	0.000459U	0.0602J	0.00952F	0.00206F	NS		
Aug-13	0.00045U	0.0505	0.0123F	0.00466F	0.000474U		
Aug-14	0.00023U	0.0468	0.038	0.0082	0.00041F		
Jul-15	0.00023U	0.11	0.018	0.0077	0.00024U		
Jul-15	0.00055U	0.066	0.017	0.0095J	0.00055U		
Aug-16	0.00023U	0.077	0.026	0.0055	0.00023U		
Oct-17	0.00052 U	0.183/0.204*	0.0102	0.0052	0.00051U		
Jan-2018	0.00051 U	0.234J/0.143J*	0.0209	0.00633	0.00051 U		

Table 3-2 Site SS017 Groundwater Monitoring Results for Dieldrin (µg/L)

NOTES:

Bold results indicate positive detections.

EPA Drinking Water Health Advisory =  $0.2 \ \mu g/L$ 

EPA Regional Screening Level, tap water =  $0.0018 \ \mu g/L$ 

EPA - Environmental Protection Agency

L - The result was reported as biased low.

J - The analyte was positively identified but the concentration is estimated.

MW - monitoring well

F - The analyte was positively identified but the associated concentration is estimated above the detection limit and below the reporting limit.

NS - Not sampled U - The analyte was analyzed for but not detected.  $\mu g/L$  - microgram per liter \* - Duplicate sample result

#### 3.3.3 Storage Tanks

#### **3.3.3.1 Aboveground Storage Tanks (ASTs)**

Air Force ASTs located or formerly located within the boundaries of the Property are listed in **Table 3-3**. The locations of the ASTs are depicted on **Attachment 1**, **Figure 3**.

 Table 3-3 Summary of Air Force Aboveground Storage Tanks in Parcel K-1-2

Facility Number	Description	Tank Capacity (gallons)	Status	Comments
707	Water Storage Tank	836,000	Empty	The City of Mesa decommissioned the water system on Parcel K-1-2 in April 2001.
714	Water Storage Tank	200,000	Removed	The City of Mesa decommissioned the water system on Parcel K-1-2 in April 2001. ASU removed the tank in 2013.
715	Sodium Hexametaphosphate	100	Empty	The City of Mesa decommissioned the water system on Parcel K-1-2 in April 2001.
715	Diesel	500	Removed	The City of Mesa decommissioned the water system on Parcel K-1-2 in April 2001.
724	Water Storage Tank	500,000	Removed	The City of Mesa decommissioned the water system on Parcel K-1-2 in April 2001. ASU removed the tank in 2013.

## 3.3.3.2 Underground Storage Tanks (USTs)

A single Air Force UST was located within the boundaries of the Property as listed in **Table 3-4**. The 500-gallon diesel UST at Facility 715 was reportedly removed in 1988 and was approved for closure by the Arizona Department of Environmental Quality in 1995 (**Attachment 6**). The Basewide EBS lists a 12,000-gallon gasoline UST at Facility 716 but the tank was located at the former gas station at the southwest corner of Unity Avenue (formerly B Street) and Innovation Way (formerly 11th Street). There was a Facility 716 located at the former gas station that was destroyed prior to construction of Facility 716 on Parcel K-1-2 in 1983. The UST associated with the former Facility 716 was a part of IRP Site ST006 and is discussed in Section 4.0.

Table 3-4 Summary of Air Force USTs in Parcel K-1-2

Facility Number	Former Contents	Tank Capacity (gallons)	Site, Releases, and/or Spill Number	Tank Status	Closure Status
715	Diesel	500	None	Removed	Closed – Arizona Department of Environmental Quality Closure Letter, December 1995 ( <b>Attachment 6</b> )

## 3.3.3 Oil/Water Separators (OWSs)

There is no change from the Basewide EBS. There were/are no OWSs located within the boundaries of the Property.

#### 3.3.4 Pesticides

There is no change from the Basewide EBS. Former facilities 722 and 723 were the location of an old pesticide shop on the Property through the mid-1970s. The old pesticide shop, also reportedly used for storage of paints after 1960, was investigated and addressed as IRP Site SS017 (see Section 3.3.2). Pesticides stored or released on the Property are listed in **Attachments 4** and **5**, respectively.

#### **3.3.5** Petroleum Products and Derivatives

Petroleum products are not currently stored on the Property. Information concerning quantities of petroleum products previously stored on the Property may be found in Section 3.3.3, Storage Tanks. There were no records of leaks, spills, or corrective actions for petroleum products and derivatives.

## 3.3.6 Medical/Biohazardous Waste

There is no change from the Basewide EBS. There are no records of medical/biohazardous waste storage on the Property.

#### 3.3.7 Military Munitions: Unexploded Ordnance (UXO), Discarded Military Munitions (DMM), Waste Military Munitions (WMM), Explosive Soils, Explosive Debris, and/or Munitions Constituents (MC)

There is no change from the Basewide EBS. There are no UXO, DMM, WMM, explosive soils, explosive debris, and/or MCs stored or discarded within the boundaries of the Property.

#### 3.3.8 Wastewater Discharges

The sanitary sewer system on the former Williams AFB is owned by the City of Mesa. There are no industrial wastewater discharges from the Property.

#### 3.3.9 Radioactive and Mixed Waste

There is no change from the Basewide EBS. There are no records of radioactive and/or mixed wastes storage or disposal within the boundaries of the Property.

#### 3.3.10 Solid Waste

There is no change from the Basewide EBS. There are no records of solid waste disposal on the Property.

#### 3.3.11 Septic Tanks (Wastewater)

There is no change from the Basewide EBS. No septic tanks, leach fields, and/or wastewater wells are known to have been located within the boundaries of the Property.

## 3.3.12 Silver Recovery Units (SRUs)

There is no change from the Basewide EBS. No SRUs were/are located within the boundaries of the Property.

Former Williams AFB

#### **3.3.13** Environmental Permits

No air permits are associated with the Property; no RCRA permits are associated with the Property.

#### 3.3.14 Grease Traps

There is no change from the Basewide EBS. No grease traps were/are located within the boundaries of the Property.

#### 3.3.15 Emerging Contaminants

Per- and polyfluorinated alkyl substances (PFAS) are a group of manmade chemicals that have been used for a wide variety of household, commercial, and industrial uses. PFAS are classified as emerging environmental contaminants because they do not have established regulatory standards, but the EPA has issued lifetime health advisories for two PFAS: perfluorooctane sulfonate (PFOS), and perfluorooctanoic acid (PFOA). EPA has set Regional Screening levels for perfluorobutane sulfonate (PFBS). Aqueous Film Forming Foam (AFFF) appears to be the most likely source of PFAS potentially present at Air Force bases, including the former Williams AFB. As a result of the Final Perfluorinated Compounds Preliminary Assessment (AMEC, 2016), no storage, handling, use or disposal of PFAS was identified within the boundaries of the Property. Sampling at other areas of the former Williams AFB where potential storage, handling, use, or disposal of PFAS was identified in the Preliminary Assessment was performed in 2018 and results have been presented to EPA and ADEQ. The Site Inspection Report is pending. PFOS and PFOA are present at levels above the health advisories at some of the other areas of former Williams AFB, but based on historical property use and analytical results from the nearest upgradient well (Toka Sticks Golf Course Irrigation Well #1), there is no evidence that the Property is impacted with PFAS.

#### 3.4 DISCLOSURE RESOURCES

#### 3.4.1 Asbestos-Containing Material (ACM)

A basewide survey to identify ACM was conducted at Williams AFB in 1992 and is summarized in the Basewide EBS. The survey sampled all buildings except family residences which were sampled representatively. Non-friable asbestos was identified in the floor tile and window glazing at Facility 715, the Water Pumping Station and Supply Treatment Facility. The facilities on the Property contained no ACM degraded to the extent that it could create a potential source of airborne fibers when leased to ASU. ASU, as the lessee, is responsible for maintaining the facilities under terms of the lease. Facilities/buildings containing asbestos are indicated in **Table 3-1**, List of Facilities.

An asbestos abatement project was completed in 2013 by ASU in association with refurbishment or demolition of Property facilities (Adams and Wendt, 2014). The project included removal of ACM from portions of the exterior wall of Facility 715 (texture/filler), around Facilities 714, 715, and 724 (transite debris), and underneath demolished Facilities 714 and 724 (felt/tape).

No asbestos surveys or abatement program for utility systems are known to have been performed on the former Williams AFB. Since the majority of the utility systems were constructed prior to 1981 when use of ACM was common, there is a potential for ACM in the form of insulation or piping material to exist in conjunction with utility systems which have either been closed by the Air Force or transferred to utility providers. There is also a potential for ACM in the soil resulting from abandonment in place of utility lines. There is also a potential for ACM in the soil resulting from historical facility demolition activities.

Disclosure of ACM associated with facilities, utilities, and soil is required for the Property.

## **3.4.2** Polychlorinated Biphenyls (PCBs)

The Basewide EBS indicates that all PCB-contaminated (>50 ppm PCBs) transformers and capacitors were removed and transported off base for disposal. The Basewide EBS identified four transformers as PCB items, all less than 50 ppm PCBs, located at facilities 715, 716 and 724. During the September 2018 VSI (**Attachment** 3), two transformers were observed on the Property: a ground mounted unit located on the northeast corner of facility 715 (PCB item specified in Basewide EBS) appeared to be out of service and a pole mounted unit owned by Salt River Project, electric utility provider to the Property, located along the western fence line toward the northwest corner of the Property appeared to be in service. Soils impacted by a release from a PCB capacitor on the well pump motor for BPW6 were excavated and removed as discussed in Section 3.3.2 of this SEBS. The Grantee and subsequent transferees will be notified of their responsibility for handling such materials in compliance with applicable federal, state, and local laws and regulations.

## 3.4.3 Radon

There is no change from the Basewide EBS. No monitoring for Radon was accomplished on this Property.

## **3.4.4** Lead-Based Paint (LBP)

**Lead-Based Paint (LBP) Housing:** There is no change from the Basewide EBS. There are no housing areas located on the Property.

**LBP Facilities other than Housing:** There was no testing of facilities other than housing for LBP. However, facilities 707, 708, 714, 715 and 724 were constructed prior to 1978 when the DoD banned the use of LBP. Facilities constructed prior to 1978 may contain LBP as indicated in **Table 3-1**, List of Facilities.

A LBP abatement project for facilities other than housing was completed in 2013 by ASU in association with refurbishment or demolition of Property facilities (Adams and Wendt, 2014). The project included removal of loose paint from Facilities 714 and 724 to facilitate demolition, and removal of loose paint from Facilities 707 and 715 to facilitate repainting. Due to LBP in the soil resulting from general historical maintenance activities at the Property, an LBP abatement compliance project for legacy LBP in soil was completed by the Air Force in 2017 and 2018. Soil impacted by LBP was removed from the Property to achieve the Arizona residential SRL of 400 mg/kg (AMEC, 2018). ADEQ issued a letter dated 19 January 2019 granting a determination of No Further Action for lead in soil for the excavation area (ADEQ, 2019; **Attachment 6**). The

excavation area where soil impacted with LBP was removed is shown on Attachment 1, Figure 5.

Disclosure of potential LBP for facilities other than housing is required for the Property.

# 4.0 FINDINGS FOR ADJOINING PROPERTIES

An evaluation of adjacent properties was conducted for the presence (and former presence) of IRP sites, military munitions sites, radiological and mixed waste disposal sites, leaking petroleum storage tanks, OWSs, wash racks, septic tanks, grease traps and SRUs within 0.25 mile of the Property and all UST sites within 500 feet of the Property. **Attachment 1, Figure 6** shows the area within 0.25 mile of the Property. The area within 0.25 mile of the Property is all within the former Williams AFB.

Four IRP sites are located within 0.25 mile of the Property: Prime Beef Yard (SS029); Paint Shop Leach Field (WP027); USTs associated with former Building 725 (ST006); and USTs associated with former Building 760 (ST035). Soils contaminated with metals and petroleum hydrocarbons at SS029 and WP027 were addressed by removal action excavations and the sites were documented as requiring no further action in the *OU-5 ROD* (IT, 1997). USTs at ST006 and ST035 have been removed and ST006 was closed as a no further action site in the *OU-1 ROD* (AFBCA, 1994). Site ST035 was a former gas station (former Building 760) for which closure of the former USTs is subject to Arizona UST regulations. Based on the presence of soil contamination observed and detected after the USTs were removed, a soil vapor extraction system was installed and operated at ST035 from 2010 through 2013. Groundwater monitoring was conducted from 1997 through 2016. Based on the *Final Corrective Action Completion Report* (AMEC, 2017) closure of ST035 was approved by the ADEQ (ADEQ, 2018) (**Attachment 6**). None of the environmental factors associated with these adjacent IRP and UST sites impact the Property.

# 5.0 **PROPERTY CATEGORY**

The Basewide EBS classified portions of the Property as DoD Environment Condition Categories (ECC) 1 (Facilities 707, 714, 724), 2 (Facility 708) and 7 (Facilities 715, 716, 722, 723). As indicated in **Table 3-1**, Facilities 714, 722, 723, and 724 have been removed from the Property. Categories 1 and 2 denote property that is suitable for transfer. The Basewide EBS classified portions of the Property as Category 7 because of required response actions or ongoing evaluations associated with the former pesticide/paint shop (IRP Site SS017) and UST removals. Based on UST closure documentation (Section 3.3.3.2), the Parcel K and K-1 SEBS changed the classification for Facility 715 to Category 2.

IRP Site SS017 was identified to address soil contamination associated with a former pesticide/paint shop (Facilities 722/723) and with a PCB release at the equipment pad for Facility 708 (Base Production Well #6 [BPW6]). As discussed in Section 3.3.2, a removal action was conducted in 2001 to excavate dieldrin-contaminated soil associated with the former pesticide shop and PCB-contaminated soil associated with BPW6. The excavation removed soils that exceeded the Arizona residential SRL to a depth of four meters bgs. Post-excavation sampling confirmed that PCBs did not remain above the SRL but dieldrin in soil at depths greater than four meters bgs remains above the SRL. Groundwater monitoring has proceeded at the site since

the removal action. The final remedy for Site SS017, groundwater monitoring and LUCs, was selected in the OU-6 ROD. The LUCs for management of soil address dieldrin concentrations above the Arizona residential SRL in soil deeper than 4 meters. Pending transfer, the Air Force retains ownership of the Property and implements the LUCs as specified in the OU-6 ROD. As discussed in Section 3.4.4, an LBP abatement project for legacy LBP in soil removed impacted soil from the Property to achieve the Arizona residential SRL of 400 mg/kg.

Based on the completed Removal Action, implementation of the OU-6 selected remedy, and the LBP in soil abatement project, the Property is now considered Category 4. Category 4 denotes areas where release, disposal, and/or migration of hazardous substances have occurred, and all removal or remedial actions to protect human health and the environment have been taken.

Based on a review of the Basewide EBS, FEIS, Parcel K and K-1 SEBS, Parcel K-1-2 SEBS (Easements), the VSI, and this SEBS, the Property is suitable for transfer as DoD ECC Category 4. Current data indicate the selected statutory determination actions are protective of human health and the environment and the Property is suitable for its intended use in support of educational purposes.

#### CERTIFICATION

I certify that the Property conditions stated in this report are based on a thorough review of available records, visual inspections, sampling and analysis as noted, and are true and correct to the best of my knowledge and belief.

## CATHERINE JERRARD

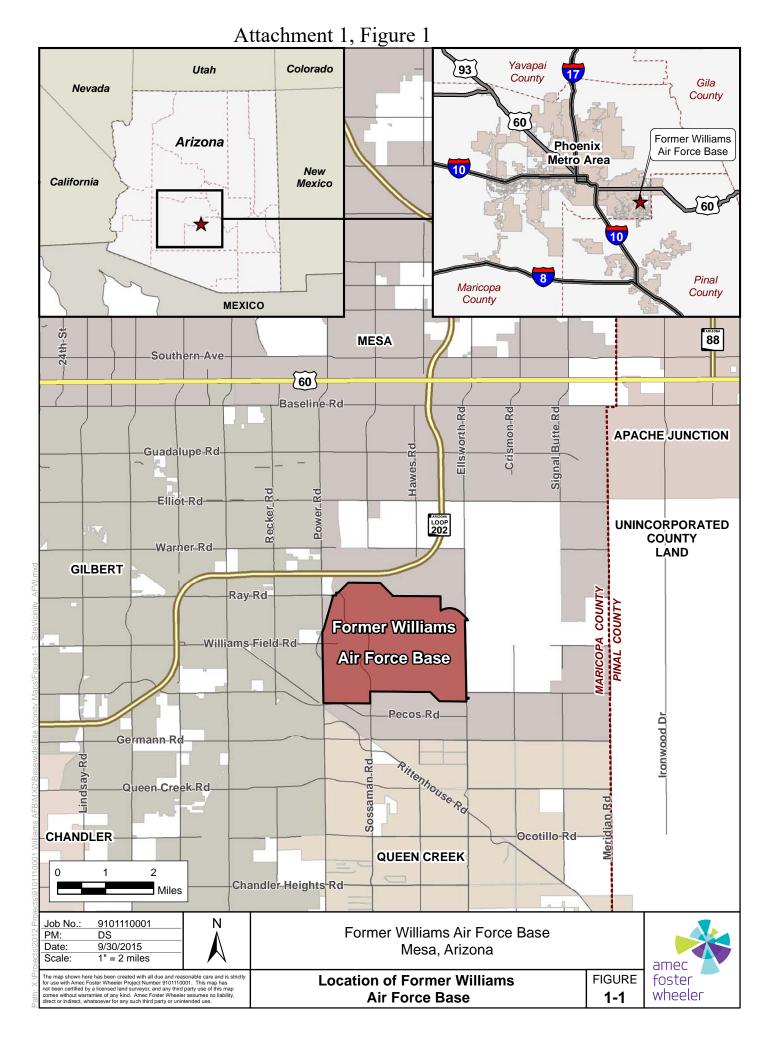
BRAC Environmental Coordinator, Former Williams AFB Date:

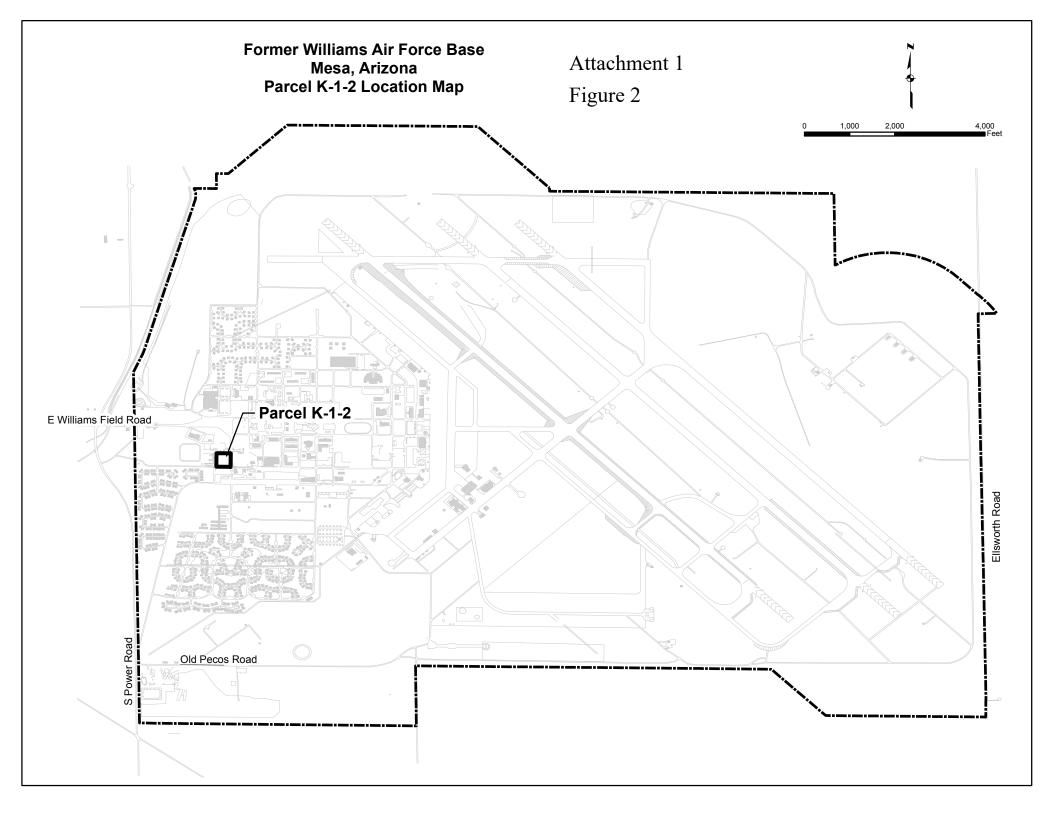
Attachments:

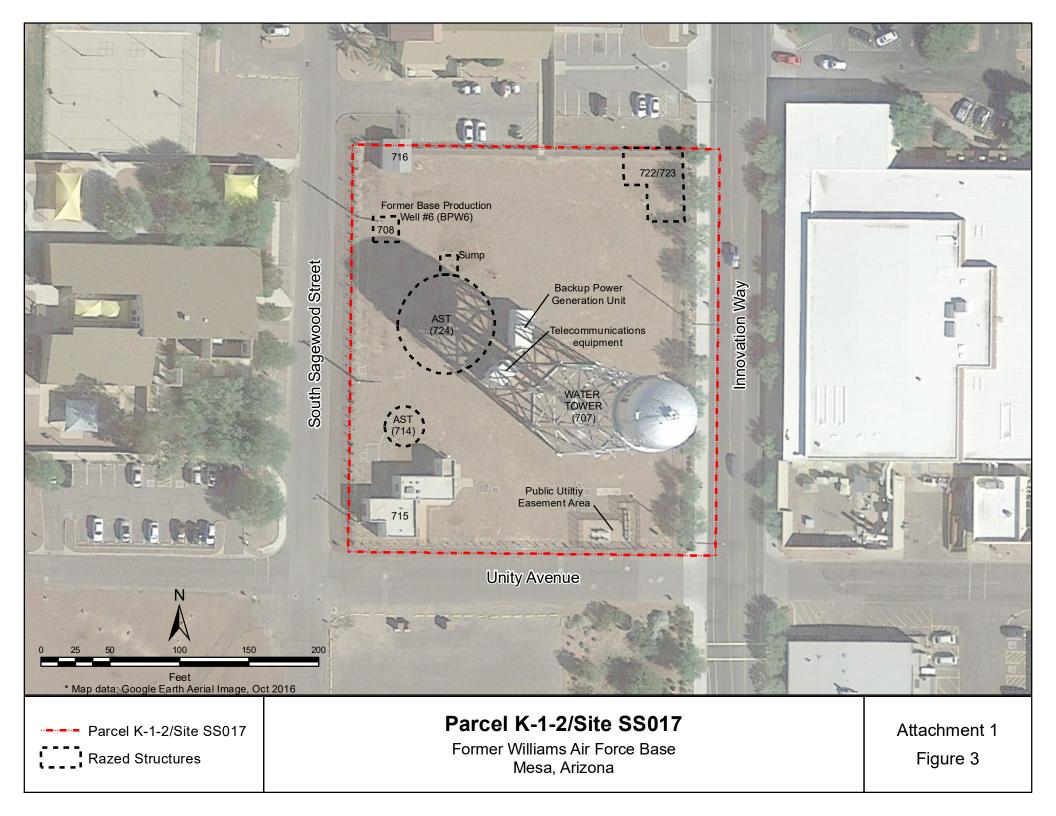
- 1. Figures
  - Figure 1 Location of Former Williams AFB
  - Figure 2 Property Location Map IRP Sites within the Projected Conveyance Parcel
  - Figure 3 Parcel K-1-2/Site SS017 Map
  - Figure 4 Site SS017 Groundwater Potentiometric Map
  - Figure 5 Parcel K-1-2/Site SS017 Excavation Areas and Monitoring Wells Figure 6 – IRP Sites on Adjacent Property
- 2. Reference Documents
- 3. Visual Site Inspection
- 4. Notice of Hazardous Substances Stored
- 5. Notice of Hazardous Substances Released
- 6. Arizona Department of Environmental Quality Closure Letters
- 7. Responses to Regulatory Comments

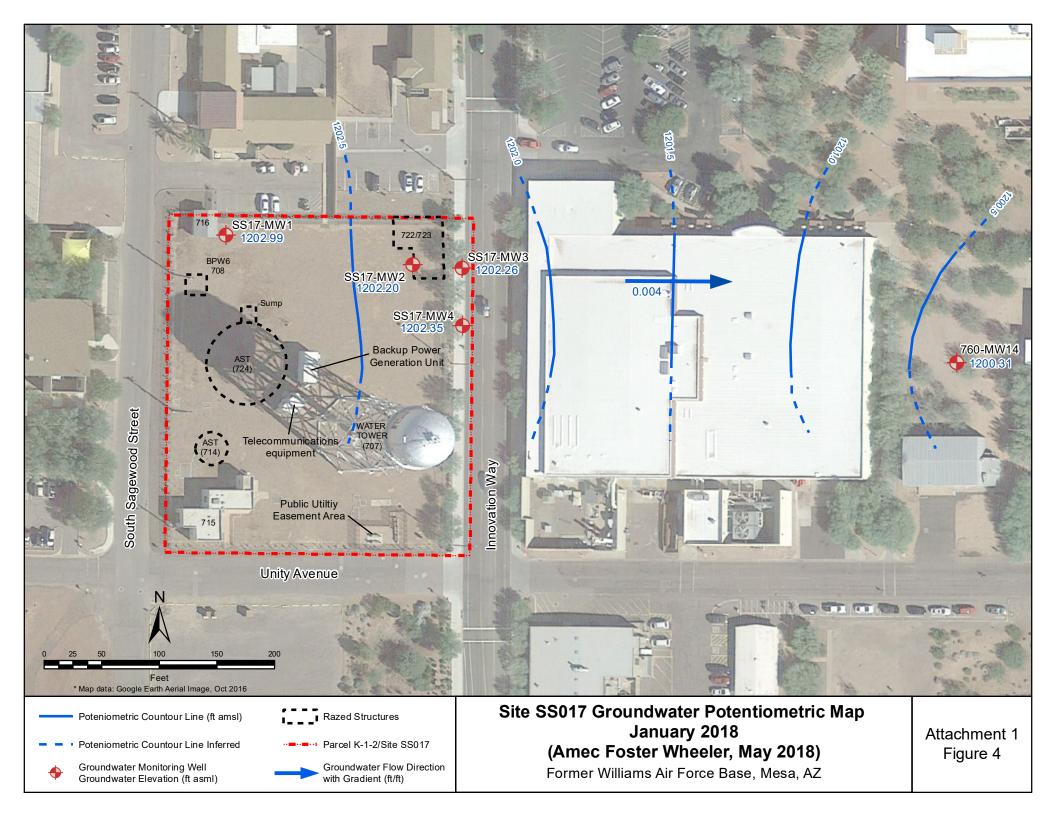
# **ATTACHMENT 1**

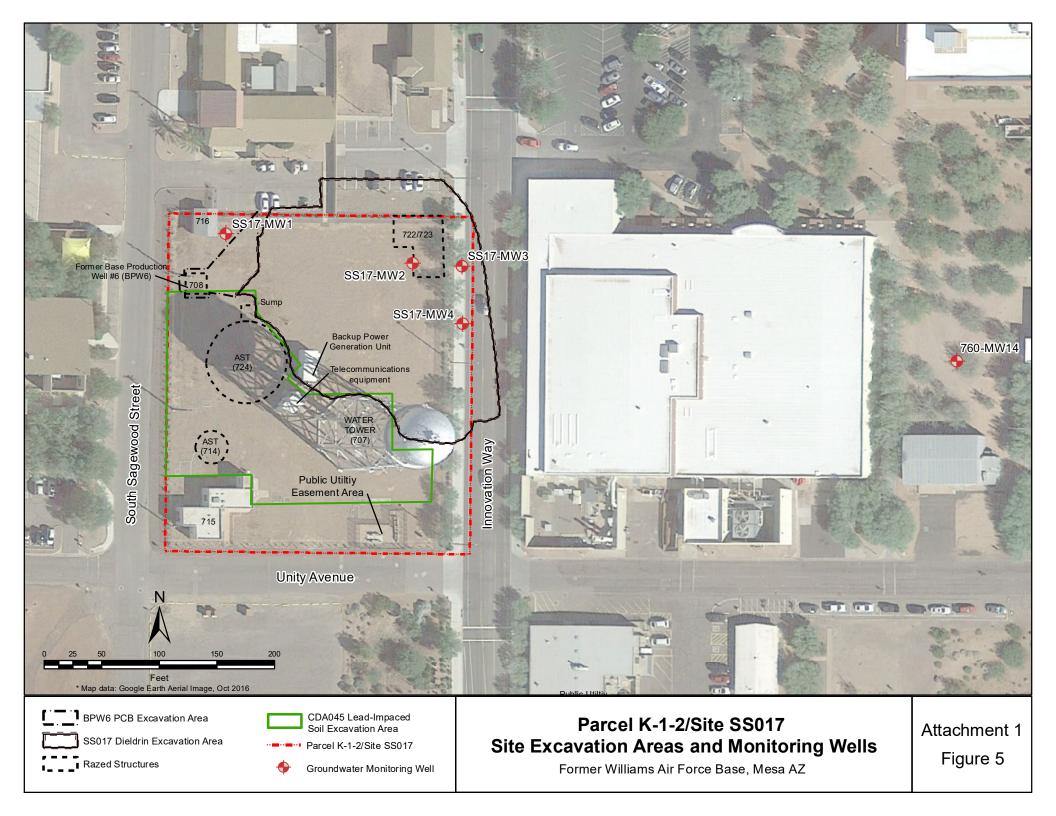
# FIGURES

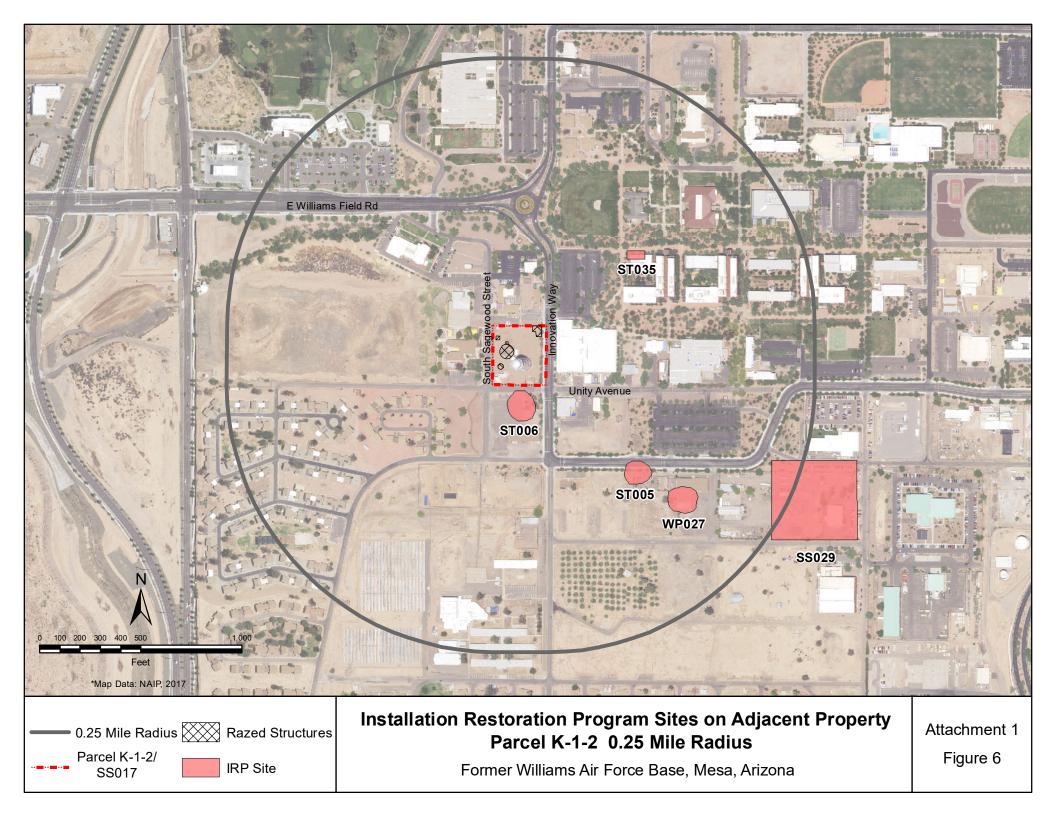












# **ATTACHMENT 2**

# **REFERENCE DOCUMENTS**

## ATTACHMENT 2 REFERENCE DOCUMENTS

The data used in the SEBS was based on a review of the following documents:

- Basewide Environmental Baseline Survey (EBS), Williams Air Force Base (AFB), Arizona (AZ), Halliburton NUS Corporation, December 1993 (Administrative Record [AR] #591);
- (2) Final Baseline Ecological Risk Assessment, Operable Unit (OU) 3 Basewide, Williams AFB, AZ, IT Corporation, December 1993 [AR# 497]
- (3) Final Record of Decision (ROD), Operable Unit (OU) 1, Former Williams AFB, Air Force Base Conversion Agency (AFBCA), April 1994 (AR #480);
- (4) Archaeological Survey and Test Excavations at Williams AFB. AZ, SWCA, Inc. Environmental Consultants, April 1994;
- (5) Final Environmental Impact Statement (FEIS) for the Disposal and Reuse of Williams AFB, U. S. Air Force, June 1994 (AR #638);
- (6) Final Evaluation/Assessment Report, Williams AFB, IT Corporation, September 1994 (AR #641);
- (7) Final ROD, Environmental Impact Statement on the Disposal and Reuse of Williams AFB, U. S. Air Force, February 1995;
- (8) Final Programmatic Agreement Among the United States Air Force, the Arizona State Historic Preservation Officer, and the Advisory Council on Historic Preservation Concerning Disposal of Williams AFB, Mesa, AZ, U. S. Air Force, March 1995;
- (9) Supplemental Records of Decision (SROD), Williams AFB, U. S. Air Force, August 8, 1995; February 26, 1997; April 8, 1998; and October 23, 2001;
- (10) Treatment Plan for Archaeological Resources and Historic Structures and Buildings at Williams AFB, Maricopa County, AZ, SWCA, Inc., August 1995
- (11) Closure Letter for UST at Facility 715, Arizona Department of Environmental Quality (ADEQ), December 1995;
- (12) Supplemental Environmental Baseline Survey (SEBS), Parcel K and Parcel K-1, Williams AFB, Air Force Base Conversion Agency (AFBCA), December 1996;
- (13) Final OU-5 ROD, Former Williams AFB, IT Corporation, September 1997 (AR# 902)
- (14) Final Remedial Investigation Report, OU-6, Williams AFB, IT Corporation, February 1999 (AR #978 and 979);
- (15) Final Feasibility Study Report, OU-6, Williams AFB, IT Corporation, February 2000, AR #1459);
- (16) Final Action Memorandum, Spill Site 17 (SS-17), Williams AFB, AZ, BEM Systems Inc., October 2000 (AR #1146);
- (17) SEBS for Parcel K-1-2 (Easements), Williams AFB, Air Force Civil Engineering Center (AFCEC), March 2011;
- (18) Revised Final OU-6 Removal Action Completion Report, Former Williams AFB, URS Corporation, January 2013 (AR# 1540, 1540.1, 1540.2);
- (19) Asbestos Abatement and Lead Paint Stabilization Report for Arizona State University, Water Tower Rehab Project, Mesa, AZ, Adams and Wendt Inc., March 2014;

## ATTACHMENT 2 REFERENCE DOCUMENTS

- (20) Final Perfluorinated Compounds Preliminary Assessment, Former Williams AFB, Mesa, AZ, AMEC Foster Wheeler Environment and Infrastructure, Inc. [AMEC Foster Wheeler], July 2016 (AR# 538204);
- (21) Final Annual 2015 Groundwater Monitoring Report, Site ST035, Former Williams AFB, Mesa, AZ, AMEC Foster Wheeler, February 2017 (AR# 547752, 547752.1);
- (22) Final Annual 2015 Groundwater Monitoring Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams AFB, Mesa, AZ, AMEC Foster Wheeler, April 2017 (AR# 550557 through 550557.6);
- (23) Final Corrective Action Completion Report, Site ST035, Former Williams AFB, AMEC Foster Wheeler, June 2017 (AR# 555521, 555521.1, 555521.2);
- (24) Final Remedial Action Quarterly Status Report, April through June 2016, Site LF004, Former Williams AFB, Mesa, AZ, AMEC Foster Wheeler, August 2017 (AR #570412 through 570412.7);
- (25) Regional Screening Levels, Generic Tables, Environmental Protection Agency, November 2018;
- (26) Draft Groundwater Monitoring Data Summary Report, January 2018, Site SS017, Former Williams AFB, Mesa, AZ, AMEC Foster Wheeler, May 2018
- (27) Final OU-6 ROD, Former Williams AFB, AFCEC, February 2018 (AR# 570543)
- (28) Leaking Underground Storage Tank (LUST) Case Closure Notice of Decision, Former Building 760, ADEQ, June 2018 (AR# 574494)
- (29) Report of Characterization and Removal of Soil Contaminated with Lead Based Paint, Compliance Site CDA045 Parcel K-1-2, Former Williams AFB, AMEC Foster Wheeler, July 2018 (AR#576417)
- (30) Final Groundwater Monitoring Report, 2017 Annual Event, Old Pesticide/Paint Shop, Site SS017, Former Williams AFB, Mesa, AZ, AMEC Foster Wheeler, September 2018 (AR #577231)
- (31) No Further Action Report, Parcel K-1-2 Lead Based Paint Site CDA045, Former Williams AFB, Mesa, AZ, Air Force Civil Engineer Center, November 2018
- (32) No Further Action Determination for Lead in Soil, Williams AFB Lead Paint Site CDA045, Parcel K-1-2, Arizona Department of Environmental Quality, January 2019
- (33) Email correspondence, Generator Tank at Verizon Antenna Location ASU East, Verizon Wireless, February 2019

Note: Administrative Record (AR) File documents are located on the following website address: <u>https://afcec.publicadmin-records.us.af.mil/search.aspx</u>

# ATTACHMENT 3

# **2018 VISUAL SITE INSPECTION**

#### VISUAL SITE INSPECTION (VSI) WILLIAMS AIR FORCE BASE

## **GENERAL INFORMATION**

Parcel K-1-2		<b>Current Use: Education</b>
Date Inspected:	09/06/2018	
Type of Building:	Potable Water Treatment, Storage, & Distribution	<b>Area</b> (acres): 1.782
Type of Construction:	N/A	Year of Construction: N/A

**Discussion:** Parcel K-1-2 is within the Arizona State University (ASU) Polytechnic campus and contains an empty, elevated, steel Water Storage Tank (Facility 707) and Buildings 715 and 716. Additional features on the parcel include two (2) pre-fabricated, concrete buildings installed by ASU, water distribution piping installed by the City of Mesa, abandoned utility vaults (filled with pea gravel), one (1) ground mounted electrical transformer (at Building 715), and one (1) pole mounted electrical transformer. The two (2) ASU structures are for telecommunications equipment (south structure) and emergency back-up power generation (north structure). The rest of the parcel is open and unimproved. Building 715 is constructed of concrete and formerly housed a water production pump station and water treatment equipment. It is currently unused and unoccupied. Building 716 is constructed of slump block and was formerly used for equipment and material storage. It is currently used by ASU for storage. Empty recycling bins, ceiling tiles, and small plastic storage bins were stored in the building at the time of the inspection. Adjacent on the north is the ASU Facility Management and Police Department office building and associated parking lot; on the east is South Innovation Way West; East Unity Avenue is on the south; and South Sagewood Street is on the west.





# PHYSICAL SETTING

#### **Current Uses of the Facility**

Are any current uses likely to involve treatment, storage, disposal, or generation of hazardous substances or petroleum products?  $\Box Yes \quad \boxtimes No$ 

#### Report current uses based on observation, interviews, and records review.

ASU controls access to Parcel K-1-2. It is the location of an inactive and decommissioned portion of the former Williams AFB potable water treatment, storage, and distribution system. Two small, concrete buildings were installed by ASU for telecommunications equipment (south building) and emergency back-up power generation (north building). ASU completed a road widening project for Innovation Way West (formerly Williams Campus Loop) road in 2011 that required the eastern fence be relocated approximately 30-feet west of its original location. New concrete curb and gutter, sidewalk and asphalt roadway were built along the eastern edge of the parcel.

#### Past Uses of the Facility

Were any past uses likely to have involved treatment, storage, disposal, or generation of hazardous substances or petroleum?  $\boxtimes$  **Yes**  $\square$  **No** 

#### Report all past uses based on observations, interviews, and records review.

Installation Restoration Program (IRP) site SS017 (Pesticide/Paint Shop) was formerly located along the northeast portion of the parcel. Removal of dieldrin-contaminated soil to a depth of 4 meters was completed in 2001. No surface soil contamination remains; however, groundwater monitoring continues. Removal of polychlorinated biphenyl-contaminated soil in the vicinity of Water Well 708 (Base Production Well 6) was completed in 2001 to a depth of 7 feet. A military working-dog training area was formerly located in the central portion of the parcel along the north boundary.

# **PHYSICAL CONDITIONS and FINDINGS**

N = No Y=Yes X=Excellent G=Good F=Fair P=Poor NA=Not Applicable

		COMMENTS
Condition of Paint	G	Exception: peeling paint is present on the interior of Building 715 (P)
Condition of Building	<b>G</b> Exception: Building 715 interior is deteriorated (P).	
Air Emissions Sources	NA	
PCB Containing Equipment	<u>N</u>	An out-of-service electrical transformer is present on the east-side of Building 715; an in-service pole-mounted transformer is present along northwest fence.
Historical Property	NA	
Observed Wetlands	NA	
Drinking Water Wells	NA	
Remedial System	NA	
Monitoring Wells	Y	Four groundwater monitoring wells associated with IRP site SS017 are present on the parcel. Two (2) wells (red painted above ground casing) are inside the fenced parcel. Two flush mounted wells are outside the eastern fence in the sidewalk.

## Hazardous Material and Waste, Petroleum, Oil, and Lubricant Units

Describe the condition of and materials handled by the following units (use the abbreviations listed below for Waste Stream column).

N=No Y=Yes HM=Hazardous Material HW=Hazardous Waste POL=Petroleum Oil & Lubricant Product POLW=POL Waste OTH=Other

Industrial	WASTE Stream	Comments
Floor Drains	Ν	
Waste Water System	N	
Oil/Water Separators	N	
Washracks	<u>N</u>	
Above Ground Storage Tank	POL	Diesel day tank at 715, West side of building. Unit is disabled, tank is reportedly empty (ASU 2018) and there is no evidence of spillage from the tank.
Underground Storage Tank	N	
Other Tanks	Ν	
Sumps	Ν	
Silver Recovery Units	N	
Hydrant System	N	
Radioactive Units	N	
Container Storage Area	N	
Other	<u>N</u>	
SURFACE WATER		COMMENTS
Storm Water System	Ν	
Pits, Ponds, Lagoons	Ν	
Other	Ν	
MUNICIPAL		COMMENTS
Sanitary Sewer ( <i>utility</i> ownership)	<u>N</u>	
Septic Tanks	N	
Grease Traps	N	
Drains	Ν	
Other	N	

## **Site Conditions**

Y=YES N=NO

COMMENTS

Odors	N	
Pools of Liquid	N	
Stained Soil	N	
Stains (walls, floor, etc)	N	
Stressed Vegetation	N	
Other Areas of Concern	Ν	

INSPECTED BY: //signed// Charles Helms CLÆNE Group DATE: September 6, 2018

## PHOTOGRAPHS



Photo 1:Parcel K-1-2 from Unity Way, Building 715, September 6, 2018, view North



Photo 2: Transformer at Building 715, September 6, 2018, view West



Photo 3: Building 715 Pump Room, September 6, 2018, view North



Photo 4: Inside Building 715, battery, September 6, 2018, view East



Photo 5: Building 715 chemical mixing room, September 6, 2018, view West



Photo 6: Building 715 diesel day tank on west side, September 6, 2018, view East



Photo 7: Across Parcel to Building 716, September 6, 2018, view North



Photo 8: Inside Building 716, September 6, 2018, view West



Photo 9: Monitoring well near Building 716 (typical of two), September 6, 2018, view West



Photo 10: Telecommunication buildings, September 6, 2018, view East



Photo 11: Across Parcel from water tower, Building 716 and two (2) monitoring wells (red above ground casing) in background, September 6, 2018, view North



Photo 12: Flush mounted monitoring well (typical of two), outside fence on east side of Parcel, September 6, 2018, view South

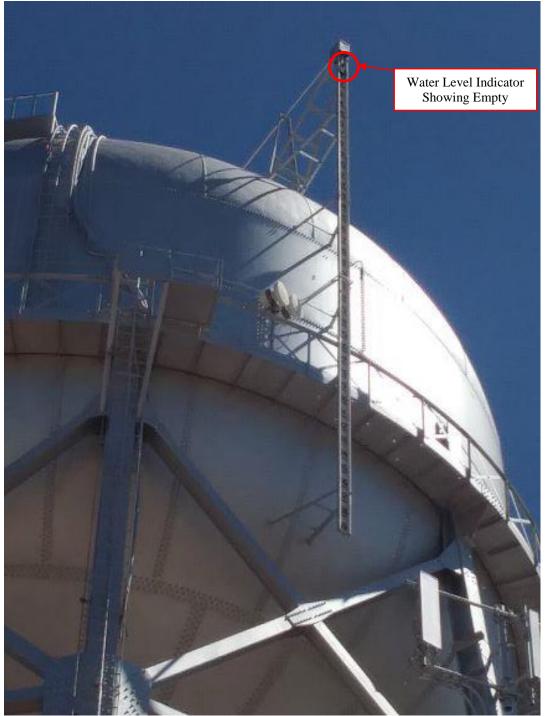


Photo 13: Water tower gauge reading empty (note level indicator at top), September 6, 2018, view East

## ATTACHMENT 4 NOTICE OF HAZARDOUS SUBSTANCES STORED

## ATTACHMENT 4 NOTICE OF HAZARDOUS SUBSTANCES STORED

### NOTICE OF HAZARDOUS SUBSTANCES STORED

Notice is hereby given that the tables and information provided below from the Environmental Baseline Survey contain a notice of hazardous substances that have been stored on the Property and the dates that such storage took place. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

C-h-t	Regulatory	CASI N.	Quantity	Dates of	Constitution and a <sup>2</sup>	D	Hazardous	Demoster		
Substance	Synonym(s)	CAS <sup>1</sup> No.	Used/Stored	Use/Storage	Constituents <sup>2</sup>	Percent <sup>2</sup>	Waste ID No.	Remarks		
Facilities 715	Facilities 715 and 716									
Chlorine	N/A	7782-50-5	5,794 kg /yr	1985-1992	Chlorine	99.5	N/A	Potable water treatment chemical		
Caustic Soda Flake	Sodium Hydroxide	1310-73-2	13,605 kg /yr	1985-1991	Sodium hydroxide	Not specified	N/A	Potable water treatment chemical		
Sodium hexameta- phosphate	SHMP	10124-56-8	10,884 kg/yr	1985-1990	Sodium hexametaphosphate	>95	N/A	Potable water treatment chemical		
Sodium hypochlorite	Bleach	7681-52-9M	2,272 kg/yr	Unknown	Sodium hypochlorite Sodium hydroxide Sodium carbonate	1-16 <1 <1	N/A	Potable water treatment chemical		
Facilities 722	and 723 (former	· buildings, remo	oved)							
Dieldrin	N/A	60-57-1	Unknown	Unknown	Dieldrin	100	P037	Pesticide storage		
Chlordane	N/A		Unknown	1980	Chlordane	100		Pesticide storage		
Calcium cyanide	Cyanogas	592-01-8	Unknown	1971	Calcium cyanide		P021	Pesticide storage		
Strychnine	N/A	57-24-9	Unknown	Unknown	Strychnine		P108	Pesticide storage		

<sup>1</sup> CAS=Chemical Abstracts Service Number. NA = not applicable

<sup>2</sup> Constituents and percent of constituents in product as listed on Air Force Form 1761.

## ATTACHMENT 5 NOTICE OF HAZARDOUS SUBSTANCES RELEASED

## ATTACHMENT 5 NOTICE OF HAZARDOUS SUBSTANCES RELEASED

## NOTICE OF HAZARDOUS SUBSTANCES RELEASED

Notice is hereby provided that the tables and information provided below from the Environmental Baseline Survey contain a notice of hazardous substances that were released on the Property in association with the former Pesticide and Paint Shop (Facility 722) or Base Production Well 6 (BPW6). The information contained in this notice is required under the authority of regulations promulgated under Section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 42 U.S.C. Section 9620(h).

Substance	CAS Registry Number	Quantity (kg/lb)	Date	Response	Remarks
Alpha-Chlordane	5103-71-9	Unknown	Unknown	Concentrations below Arizona residential soil remediation level (SRL), no response required.	Eliminated as a COC
Gamma- Chlordane	5103-74-2	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
Arsenic	7440-38-2	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
Beta BHC	319-85-7	Unknown	Unknown	Concentrations below appropriate SRL, no response required.	Eliminated as a COC
Delta BHC	319-86-8	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
4,4' DDD	72-54-8	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
4,4' DDE	72-55-9	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
4,4' DDT	50-29-3	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
Dieldrin	60-57-1	Unknown	Unknown	Removal action completed for SS017 in 2000. Contaminated soil exceeding Arizona residential soil remediation level excavated up to four meters below ground surface (bgs). Groundwater monitoring is ongoing.	Final remedy for SS017 selected in OU-6 Record of Decision. Remedy includes continued groundwater monitoring and land use restrictions for disturbance of soil greater than four meters bgs.
Endrin	72-20-8	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
Endrin ketone	53494-70-5	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
Polychlorinated Biphenyls	1336-36-3	Unknown	Unknown	Removal action for BPW6 completed in 2000. Contaminated soil excavated to achieve Arizona residential soil remediation level.	Final remedy for BPW6 selected in OU-6 Record of Decision. No further action is required since the removal action

## ATTACHMENT 5 NOTICE OF HAZARDOUS SUBSTANCES RELEASED

### NOTICE OF HAZARDOUS SUBSTANCES RELEASED

Notice is hereby provided that the tables and information provided below from the Environmental Baseline Survey contain a notice of hazardous substances that were released on the Property in association with the former Pesticide and Paint Shop (Facility 722) or Base Production Well 6 (BPW6). The information contained in this notice is required under the authority of regulations promulgated under Section 120(h) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 42 U.S.C. Section 9620(h).

Substance	CAS Registry Number	Quantity (kg/lb)	Date	Response	Remarks
					excavation achieved Arizona residential soil remediation level.
Heptachlor	76-44-8	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC
Heptachlor Epoxide	1024-57-3	Unknown	Unknown	Concentrations below SRL, no response required.	Eliminated as a COC

## **ATTACHMENT 6**

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY CLOSURE LETTERS

### Attachment 6 BUILDING 715 TANK CLOSURE LETTER



### ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Fife Symington, Governor Russell F. Rhoades, Director

CERTIFIED MAIL Return Receipt Requested UST Ref. No. 24456 December 6, 1995

Dr. William Harris, P.E. Williams Air Force Base AFBCA\OL-S 6001 South Power Road, BLDG. #1 Mesa, Arizona 85206-0901

RE: CLOSURE REQUESTS Facility ID #0-005338

Dear Dr. Harris:

The Arizona Department of Environmental Quality (ADEQ) has reviewed the site characterization reports (SCRs) and closure requests prepared by your consultant BEM Systems, Inc., for the Williams AFB facilities listed below. Based on a review of these reports the ADEQ has determined that site characterizations are complete and no further actions will be necessary for the following sites:

WAFB # 87
 WAFB # 253
 WAFB # 715
 WAFB # 1081
 WAFB # 1108
 WAFB # 1108
 WAFB # 1121

Since there were no reported releases or evidence of release at these sites no LUST cases have been assigned and no closure letters will be issued. Your cooperation on in this matter is appreciated. For questions or comments, contact me at (602) 207-4256.

Sincerely,

Fin & Levandarky

Tim L. Levandowsky UST Corrective Actions Unit

TLL/jsd

cc: Mr. Jim Husbands, Environmental Engineer, AFBCA

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Appendix F

3033 North Central Avenue, Phoenix, Arizona 85012, (602)207-2300

Attachment 6, ST035 (B760) Closure Letter



Arizona Department of Environmental Quality



Misael Cabrera Director

Douglas A. Ducey Governor

CERTIFIED MAIL Return Receipt Requested USPS # 7012 3460 0002 5549 6491

June 11, 2018

Ms. Catherine Jerrard, P.E Department of the Air Force Air Force Civil Engineering Center 706 Hangar Road Rome, NY 13441

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

UST Owner/Operator ID # LUST File # 0293.09, .10 Facility File #: 0-005338 Maricopa County 3635Former Bldg. 760 UST/dispenserPhoenix-Mesa Gateway Airport5835 S. Sossaman Rd.Mesa, AZ 85212

Dear Ms. Jerrard:

ADEQ reviewed the referenced leaking underground storage tank (LUST) case file including the document titled *Corrective Action Completion Report* and dated June 20, 2017, which requested closure under Arizona Administrative Code (A.A.C.) R18-12-263.04. After determining that the referenced LUST case was eligible for LUST case closure, the Department provided public notice in accordance with A.A.C. R18-12-263.04(C) and A.A.C. R18-12-264.01 from May 7, 2018 to June 7, 2018. The public notice period ended without comment. In accordance with A.A.C. R18-12-263.04(D), ADEQ is closing the LUST case file for releases 0263.01-.03.

#### 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. R18-12-263.04(F).

Southern Regional Office 400 W. Congress Street • Suite 433 • Tucson, AZ 85701 (520) 628-6733 Ms. Catherine Jerrard June 11, 2018 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) 771-4453 or at dg1@azdeq.gov.

Sincerely,

lili Andui

Debi Goodwin, Sr. Risk Assessor State Lead Unit UST-LUST Section

Enclosed: Attachment A: Notice of Appeal Rights of Interim Decision

Ms. Catherine Jerrard June 11, 2018 Page 3 of 3

## 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.

Attachment 6, Parcel K-1-2 Lead No Further Action

OF ENVIRONMENTAL QUALITY



Douglas A. Ducey Governor

Via U.S. Mail

January 18, 2019 VRP 19-133

Air Force - Air Force Civil Engineer Center Attn: Ms. Catherine Jerrard 706 Hangar Road Rome, NY 13441

#### Re: No Further Action Determination for Lead in Soil Williams AFB Lead Paint Site CDA045, Parcel K-1-2 6045 S. Sagewood at Unity Ave. Mesa, Arizona 85212 Site Code: 512883-00

Dear Ms. Jerrard:

The Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) hereby grants the Air Force - Air Force Civil Engineer Center (AFCEC) a determination of No Further Action (NFA) for lead in soil for the 0.636-acre area depicted on the attached **Figure 1**, at the Williams Air Force Base Lead Paint Site CDA045, Parcel K-1-2 located in Mesa, Arizona. Please note the NFA is granted with the limitations described under Arizona Revised Statute (A.R.S.) § 49-181(E) and A.R.S. § 49-181(F) and does not address any other area of land, groundwater, or any other contaminants.

The NFA Determination for lead in soil is based on the following:

- 1. The AFCEC has adequately addressed lead-based paint (LBP) impacted soil by excavating and disposing of approximately 725 tons of LBP impacted soil and decorative rock.
- 2. The AFCEC characterized all remaining soil both laterally and vertically to below the residential Soil Remediation Level of 400 milligrams per kilogram (mg/kg) for lead.
- 3. The AFCEC calculated a site-specific Groundwater Protection Level (GPL) for lead, based on site-specific leaching data. However, concentrations remaining in soil are below the published default GPL of 290 mg/kg in 98% of the confirmation samples collected. Only 2% of the samples are above the default GPL, but the remaining samples are below the sitespecific GPL, with concentrations ranging from 304 mg/kg to 390 mg/kg.
- 4. As required by A.R.S. § 49-176(B), AFCEC provided general public notice of the Request for No Further Action determination. The public notice was placed in the Arizona Republic on November 28, 2018. The public comment period ended on December 28, 2018. No comments were received by the AFCEC or ADEQ.



Ms. Catherine Jerrard VRP Site Code 512883-00

Pursuant to A.R.S. § 49-181(F), an NFA determination under this section means that no further action shall be taken by the Department under this title to remediate or require remediation of the site or portion of the site covered by the NFA determination, unless the NFA determination is rescinded or amended pursuant to A.R.S. § 49-181(E). An NFA determination does not release or discharge any person from liability for a release of contaminants not covered by the work plan approved pursuant to A.R.S. § 49-177 or outside the boundary of the site or portion of the site covered by the determination. An NFA determination shall not preclude the Director from obtaining access to the area covered by the determination under this section or any other law.

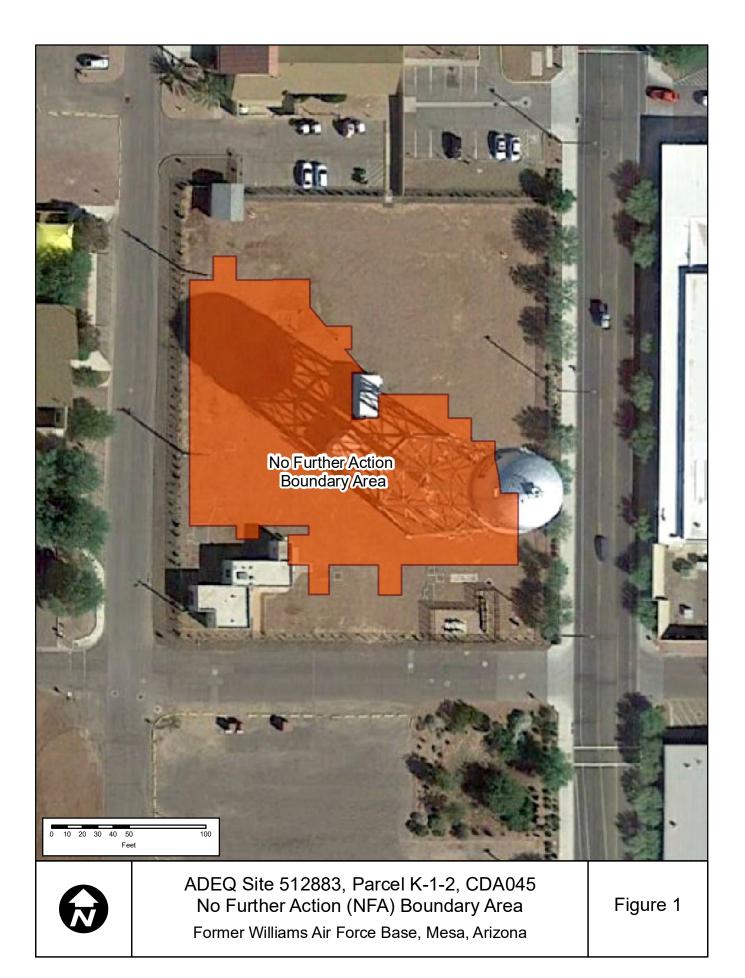
Pursuant to A.R.S. § 49-181(E), the Department may rescind or amend the NFA determination for any of the following reasons: 1) On discovery of new information that would result in the potential denial of an NFA request; 2) Information originally submitted to the Director was inaccurate, misleading or incomplete; 3) The reopening of an investigation or the taking of a remedial action is necessary to respond to a release or the threat of a release of a contaminant that may present an imminent and substantial danger to the public health or welfare or the environment. Pursuant to A.R.S. § 49-184, the ADEQ reserves the right to recover penalties or to take any action authorized by law for any violation of A.R.S. Title 49.

If you have any questions, please contact me at 602-771-4818, toll-free at 1-800-234-5677, or jp8@azdeq.gov.

Regards,

Joey Pace, Project Manager Voluntary Remediation Program

Attachment: Figure 1



# ATTACHMENT 7 RESPONSES TO REGULATORY COMMENTS

## ATTACHMENT 7 RESPONSES TO REGULATORY COMMENTS

ITEM	PAGE NUMBER	PARAGRAPH, LINE	COMMENT	RESPONSE TO COMMENT
GENER.	AL COMMEN	NTS BY ADEQ		
1			ADEQ acknowledges the updated Supplemental Environmental Baseline Survey findings.	Concur. The AF is proceeding with actions to transfer Parcel K-1-2.
2			ADEQ notes actions to be completed exist.	Responses to ADEQ comments are provided below and associated revisions have been incorporated into the Final Supplemental Environmental Baseline Survey (SEBS).
SPECIF	<b>IC COMMEN</b>	TS BY ADEQ		
1			Section 3.1 History and Current Usage, page 4 of 16; and Attachment 1, Figure 3, Parcel K-1-2/Site SSO17; and Attachment 3, 2018 Visual Site Inspection. ClarifyCurrent Usage intent. "Current" features, "usage", and hazards are incomplete. Provide existing facilities and associated hazards. The visual site inspection (see Attachment 3) includes two telecommunication-related structures which are not referenced in Section 3.1. The fuel source and fuel containment for the "back-up power generation" are not disclosed. The water tower-mounted telecommunication antennae arrays are disclosed in Section 3.1, but not in Attachment 3."Hazard" warning associated with the telecommunication system is not disclosed (see south gate posted signs). Dielectric fluid status and constituents are not presented for the "transformers" (mentioned in Attachment 3).	The referenced features and usage are related to ASU's licensed use of the Property. ASU maintains environmental compliance of facilities as a condition of the license. The following text has been added to Section 3.1 for clarification regarding the telecommunications-related structures: "Facilities located on the Property in association with the currer ASU license include the following cellular company equipment two pre-fabricated concrete structures and telecommunications antennae mounted on the water tower (Facility 707). The two structures are for telecommunications equipment and emergency back-up power generation. The emergency back-up power generation structure includes a 210-gallon diesel tank with secondary containment and leak detection (Verizon Wireless, 2019). Hazard notification signs (radio frequency hazard) for th antennae are posted on the Property fence. ASU maintains environmental compliance of its use of the Property as a condition of the license."
				The status of Air Force transformers is addressed in SEBS Section 3.4.2 which specifies that all polychlorinated biphenyl (PCB)-contaminated (>50 parts per million [ppm]) transformers were removed and transferred off base. Text was added to Section 3.4.2 indicating the facility 715 unit is the PCB item specified in the Basewide EBS and the pole-mounted unit is owned by the Salt River Project, electric utility provider

		А	PPENDIX C - AIR FORCE RESPONSES TO REGULATORY I	REVIEW COMMENTS Page 2 of 4
ITEM NUMBER / TYPE	PAGE NUMBER	PARAGRAPH, LINE	TECHNICAL COMMENTS (PRINT)	RESPONSE TO COMMENT COMMENT STATUS
				was added to Section 3.4.2 for the VSI.
2			Section 3.1 History and Current Usage, page 4 of 16, paragraph 1, line 8. Clarify Williams Campus Loop relationship to Parcel K-1-2. "Williams Campus Loop" is not shown on figures or described in text.	The reference to "Williams Campus Loop" in Section 3.1 was changed to "Innovation Way", as follows: "In 2011, the City of Mesa was granted a perpetual public right-of-way for maintenance of Innovation Way and a water system public utility easement in the southeast corner of the Property."
				Section 1.3 identifies the Property as west of Innovation Way. Innovation Way is shown on Attachment 1 figures.
3			Section 3.1 History and Current Usage, page 4 of 16, paragraph 2. Clarify the facilities related to Parcel K-1-2 transfer. The SEBS text does not present "limitation". Therefore, the SEBS is interpreted to apply to all Parcel K-1- 2 development (whether Air Force, Department of Education, municipality, or private enterprise).	Text was added to identify Air Force and non-Air Force facilities located on the Property and the title of Table 3.1 was revised to designate Air Force facilities (Text and tables in Sections 3.3.3.1 and 3.3.3.2 were similarly revised). See the response to Specific Comment 1 regarding facilities or equipment related to the ASU license and the response to Specific Comment 2 regarding City of Mesa easements. The following sentence was added to address City of Mesa facilities or equipment: "The City of Mesa has water system piping and appurtenances located within the public utility easement area in the southeast corner of the Property." The following sentence was added to the end of Section 3.1: "Facilities and equipment owned by others are not included in the planned transfer of Air Force property."
4			Section <i>3.2 Environmental Setting</i> , page 5 of 16, line 9. Verify distance to "Mexican Border" from Gila River confluence with Colorado River.	The subject sentence was revised to indicate the Gila River confluence with the Colorado River is near Yuma, AZ.
5			Section <i>3.2.1 Hydrogeology</i> , page 5 of 16. For electronic media versions, please correct the Attachment 1, Figure 4 "link". The "link" sends reader to Figure 5.	The link has been corrected.
6			Section 3.2.3. Biological, Cultural Resources, page 6 of 16, line 1 and 2 of page top partial paragraph. Clarify area search distance. Residential structures are located within one- quarter mile from Parcel K-1-2 (The Property consists of an unpaved fenced area within a developed campus, light industrial, and non-residential mixed-use area).	The subject sentence is a general statement and does not reflect a search distance. The term "non-residential" was deleted from the general statement regarding surrounding land uses in regard to Biological Resources.

		Α	PPENDIX C - AIR FORCE RESPONSES TO REGULATORY I	REVIEW COMMENTS Page 3 of 4
ITEM NUMBER / TYPE	PAGE NUMBER	PARAGRAPH, LINE	TECHNICAL COMMENTS (PRINT)	RESPONSE TO COMMENT COMMENT STATUS
7			Section 3.2.4 Utilities; Storm Water, page 6 of 16. Confirm surface flow parameters. Confirm Roosevelt Water Conservation District Canal location with respect to Parcel K-1-2. Confirm storm water discharge receptor.	The general discussion of stormwater drainage via closed and open drainage systems to the canal is accurate. The text was revised to indicate a slight decrease in elevation of the property from east to west and location of the Roosevelt Canal west of Parcel K-1-2.
8			Section 3.3.1.1 Hazardous Materials/Petroleum Products Management, page 7 of 16. Clarify potential contradictory sentences. "In addition, hazardous substances were released to the soil in the area of BPW6 and the former pesticide shop (IRP Site SS017). No hazardous substances were disposed on the Property."	For clarification, the following revised text was provided in Section 3.1.1.1: "Based on definitions provided in 40 CFR 373.4, no other storage, release, or disposal of hazardous substances has been identified on the Property."
9			Section 3.3.1.1 Hazardous Materials/Petroleum Products Management, page 7 of 16. Please clarify use intent for the terms "released" and "disposed".	Please refer to the response to Specific Comment 8.
10			Section 3.3.2 Installation Restoration Program (IRP) Sites and Areas of Concern, page 7 of 16 and 8 of 16; and Attachment 2, Reference Documents. Please note 2018, or most recent, dieldrin Arizona residential soil remediation level (AZ RSRL) and U.S. Environmental Protection Agency, Regional Screening Levels. Indicate in text if different than text- provided 0.28 milligram per kilogram (mg/kg).	<ul> <li>The following text describing the Arizona residential soil remediation levels (SRLs) applicable at the time of the Removal Action and currently was added to Section 3.3.2:</li> <li>"The dieldrin residential SRL was 0.28 milligrams per kilogram (mg/kg) at the time of the Removal Action and was changed to the current value of 0.34 mg/kg in 2007. The PCB residential SRL was 2.5 mg/kg at the time of the Removal Action and was changed to the current value of 1.1 mg/kg, also in 2007."</li> <li>Additional text was also added in Section 3.3.2 to describe attainment of the federal PCB cleanup standard (1 mg/kg) allowing use of the site as a high occupancy area without further conditions (40 CFR 761.61)</li> <li>As specified in the Operable Unit 6 (OU-6) Record of Decision (ROD), the Arizona SRL is the applicable standard for soil so the Environmental Protection Agency (EPA) regional screening level (RSL) for soil was not added to Section 3.3.2. The reference to EPA RSLs in Section 3.3.3 and Attachment 2 has been updated to reference the 2018 EPA RSLs.</li> </ul>
11			Section 3.3.3.1 Aboveground Storage Tanks (ASTs), page 9 of 16 and 10 of 16. Clarify the fuel source and fuel containment for the "back-up power generation" associated with the telecommunication- related structures (see visual site inspection Attachment 3).	The back-up power generation structure is the property of a cellular service provider operating on the Property under the Air Force license to ASU. See response to Specific Comment 1 and associated text added to Section 3.1.

	APPENDIX C - AIR FORCE RESPONSES TO REGULATORY REVIEW COMMENTS Page 4 of 4						
ITEM NUMBER / TYPE	PAGE NUMBER	PARAGRAPH, LINE	TECHNICAL COMMENTS (PRINT)	RESPONSE TO COMMENT COMMENT STATUS			
12			Section 3.3.15 Emerging Contaminants, page 12 of 16, line 14 (last sentence). Clarify the emerging contaminant status. Regarding PFAS, the sentence states "Parcel K-1-2 is not impacted". The sentence should make clear, based on historical property use and analytical results from the nearest upgradient well (Toka Sticks Golf Course Irrigation Well #1), there is no evidence that the Property is impacted with PFAS.	The last sentence was revised as follows: ", but based on historical property use and analytical results from the nearest upgradient well (Toka Sticks Golf Course Irrigation Well #1), there is no evidence that the Property is impacted with PFAS."			
13			Section 4.0 Findings for Adjoining Properties, page 13 of 16. For electronic media versions, please correct the Attachment 1, Figure 6 "link". The "link" sends reader to Figure 2.	The link has been corrected.			
14			Section 5.0 Property Category, page 14 of 16 and 15 of 16. Caveat for Category 4 selection. Until a Declaration of Environmental Use Restriction is recorded, it is ADEQ's interpretation that <i>all</i> remedial actions are incomplete. The OU-6 remedy implementation resides with the U.S. Air Force. ADEQ feels the text is ambiguous with respect to the process and the final product.	OU-6 ROD Section 2.11.1.2 specifies a Declaration of Environmental Use Restriction is required upon deed transfer of all or part of the property within the compliance boundaries to a non-federal entity. Pending such transfer, the AF retains ownership of the Property and implements the land use controls as specified in OU-6 ROD Section 2.11. The following sentence was added to Section 5.0: "Pending transfer, the Air Force retains ownership of the Property and implements the land use controls as specified in			
15			<ul><li>Figures:</li><li>a. Please add the aerial photo date on each figure. b. Please include Building 723 on the figures.</li><li>c. Include the reference #708 with well BPW6 on each figure.</li><li>d. Identify the purpose for the small fenced area near the southeast Property comer. Identify both on figures and in the text.</li></ul>	the OU-6 ROD." a. The aerial photo date was added to Figures 3, 4, 5, 6. b. Facility 723 was associated with Facility 722 and located within the footprint indicated for Facility 722. The facility label on Figures 3, 4, 5 was changed to "722/723". c. Facility 708 was added to Figures 3, 4, 5. d. The fenced area was labeled as "Public Utility Easement Area". See Specific Comment 3 for text added to Section 3.1 regarding the purpose of the area.			
16			Attachment 3, 2018 Visual Site Inspection, General Information, Discussion, page 1 of 11, paragraph1, lines 8 and 9. Please clarify if a water production well was located inside Building 715 (Building 715 is constructed of concrete and formerly housed a water production well). The remainder of the document only identifies a single well (BPW6) on the property.	Attachment 3 has been corrected to indicate Facility 715 housed a water supply pump station. BPW6 was the only water production well on the Property.			