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**Subject** 2019 Review of High-Risk Environmental Sites for I-10/SR 210  
Design Concept Report/Environmental Assessment

**Project Name** H7825: I-10: Junction I-19 to Kolb Road and SR 210: Golf Links  
Road to I-10

**Attention** Ed Green, Hazmat Team Leader

**From** Lara Pollitt, P.E./Jacobs Engineering Group Inc. (Jacobs)

**Date** June 20, 2019

**Copies to** Sarah Karasz, Brad Olbert, Mike Dawson, Joe D'Onofrio

Approved  
Ed Green  
26 Jun 19



Concur with recommendation  
for additional assessment at  
14 high risk sites.

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### 1. Introduction

The Arizona Department of Transportation (ADOT), in association with the Federal Highway Administration, plans to conduct improvements to approximately 13 miles of Interstate Highway 10 (I-10) and approximately 2.5 miles of State Route 210 (SR 210) in Tucson, Pima County, Arizona. The improvements to I-10 will be between the junction with Interstate Highway 19 at milepost (MP) 260.79 and MP 272.30 and on SR 210 from Golf Links Road to the junction with I-10.

Initial Hazardous Materials Background Reviews were prepared by EcoPlan Associates in December 2010 for the I-10 and SR 210 portions of the proposed project. In 2017, Jacobs Engineering Group Inc. (Jacobs) prepared a Preliminary Initial Site Assessment (PISA) to evaluate the potential for additional potentially hazardous incidents and materials. The PISA was finalized in May 2019 (Jacobs 2019). As part of the PISA, Jacobs reviewed a 2017 Allands environmental database report, aerial photographs, and topographic maps for areas within and adjacent to a significantly refined project limit since the December 2010 reviews. Jacobs also conducted a site reconnaissance of the project limits from August 7-10, 2017. The conclusions reached in the PISA varied significantly from the conclusions in the December 2010 background reviews.

In June 2019, ADOT requested a review of locations identified as high-risk environmental sites in the PISA. Jacobs reviewed an updated Allands database report (dated June 4, 2019) for the same project footprint and conducted site visits to the high-risk locations, as well as one additional location included in the 2019 database report that was not in the 2017 report. The site visits were performed on June 10, 2019. This Technical Memorandum documents the findings of the updated database review and site reconnaissance and includes the following:

- **Database Review** – A summary of the database review and changes to sites identified as both high risk and low risk in the PISA, as well as a description of new sites within the project limits.
- **Site Reconnaissance** - A summary of the June 10, 2019 site visits and description of changes observed at sites identified as high risk in the PISA.
- **Conclusions and Recommendations** – A summary of conclusions and recommendations based on the PISA, the 2019 site visit, and the 2019 database report.

- **Tables 1 and 2** – Updated Tables 1 and 2 from the PISA with additional information from the database review and comments from the 2019 site visits.
- **Photographs** – Photographs of high-risk sites from the 2019 Site Visit (Attachment 1)
- **Allands 2019 Environmental Database Report** (Attachment 2)
- **PISA** – PISA for the project limit prepared in 2017 and finalized in 2019 (Attachment 3) (Jacobs, 2019)

**2. Site Reconnaissance**

The PISA identified 17 regulated locations from the 2017 database review and 5 non-regulated locations based on site observations as high risk, and recommended conducting Phase I environmental site assessments at each location. The purpose of the 2019 site reconnaissance was to evaluate current activities and conditions at these locations and corroborate the recommendations for additional environmental investigations.

Jacobs site assessors, Lara Pollitt and Avery Africa, conducted site visits at 19 of these locations on June 10, 2019. Jacobs did not visit two of the locations identified in the PISA because they were areas where previous releases of hazardous materials occurred on roadways and did not involve ongoing activities. One site identified in the PISA could not be located either by the address or mapped location in the PISA. The locations assessed are presented in Tables 1 and 2.

Additionally, a site visit was conducted at a gas station (Valero Corner Store #1657 located at 4685 East Valencia Avenue) due to the location’s inclusion in the underground storage tank (UST list) in the 2019 database report.

Tables 1 and 2 include updated information for each location reviewed during the site visit. Observations during the site visit at these locations include:

- The high-risk industrial area identified in the PISA, bound by East Aviation Parkway, Technical Way and South Alvernon Way, had significant industrial activity from multiple operations. Aboveground storage tanks, drums, and chemical-like odors were observed during the site visit.
- The site visit did not indicate the presence of outdoor chemical or petroleum product storage, visible staining or other conditions that would suggest additional environmental assessments are needed at the following locations:
  - The Freightliner Truck Repair/Sales shop, 5650 Travel Plaza
  - HD Plumbing-HVAC LTD/Hughes Supply, 4571 South Alvernon Way
  - HD Plumbing- HVAC LTD/Hughes Supply 4551 South Alvernon Way
- Mechanic’s Shop listed at 4697 Alvernon Way in the PISA could not be located at the specified address or the area identified on the PISA map.
- The aboveground storage tank at KE&G Construction, 5100 South Alvernon Way, could not be located during the site visit.

Photographs from the site reconnaissance are presented in Attachment 1. Where possible, the photographs were taken to replicate the photographs from the PISA. Additional photographs were taken to document items such as storage tanks and staining at selected sites.

**3. Database Review**

The 2019 environmental database report (Attachment 2) revealed a total of 161 regulatory database listings at 90 locations entirely within, partially within, or immediately adjacent to the proposed project area. Many of these locations/facilities were listed in multiple databases.

One additional listing and location was included on the 2019 database report, UST registrations for three USTs at Valero Corner Store #1657, 4685 East Valencia Avenue.

Additional changes reflected in the database include:

- Changes in names of some facilities
- Permanent removals of USTs at two sites
- Additional Leaking UST (LUST) files at:
  - Chevron Station, 1001 East Benson Highway (file closed)
  - Chevron Station, 6301 East Benson Highway (file closed)
  - Tucson Truck Terminal, 5451 East Benson Highway (two files, files closed) – High-Risk Site
- Previously open LUST files closed:
  - Park Avenue Shell at 880 East Benson Highway (two files closed) – High-Risk Site
  - Chevron Station, 3002 South 6th Avenue (one file closed)
- Changes to notification dates and names on Resource Conservation and Recovery Act (RCRA) sites
- Changes to generator status at several sites including:
  - Tucson Printed Circuits, 770 East Evans Boulevard changing from a conditionally exempt small quantity generator to a status of not a generator verified or inactive.
  - Chevron Terminal, 3865 East Refinery Way/3865 East Ajo Way changing from a large quantity generator to a small quantity generator

None of the additional database findings or changes impacted categorization of high-risk or low-risk sites from the 2017 PISA. Table 2 includes an updated summary of sites and regulatory database findings.

#### **4. Conclusions and Recommendations**

Based on the 2019 database review and site reconnaissance, Jacobs agrees with the following conclusions and recommendations from the 2017 PISA:

- Avoidance or proper regulatory closure of wells located within the project limits that may be impacted by construction.
- Asbestos assessments should be completed per ADOT SAF 6.01 Asbestos Management Policy and applicable National Emission Standards for Hazardous Air Pollutants regulations at any buildings or structures planned for renovation or demolition prior to the commencement of construction activities.
- Lead-based paint inspections also should be performed at any buildings or structures upon or within which painted surfaces will be disturbed or demolished prior to the commencement of construction activities.

However, based on observations during the 2019 site visits and review of the 2019 database report, Jacobs recommends removing 8 locations from the 22 locations identified in the PISA as requiring Phase I Environmental Assessments. The rationale for removal of these 8 locations follows:

- HD Plumbing-HVAC LTD/Hughes Supply, 4571 South Alvernon Way – This location was included as a high-risk site due to its listing on the RCRA database. However, it is listed in both 2017 and 2019 with a site status of not a generator verified or inactive, indicating that they did not generate hazardous waste requiring disposal in 2017 or 2019. Additionally, no chemical containers, staining, or other indications of environmental conditions were observed during the Site visit.
- HD Plumbing-HVAC LTD/Hughes Supply 4551 South Alvernon Way – This location was included as a high-risk site due to its listing on the RCRA database. However, the site is listed in both 2017 and 2019 with a site status of not a generator verified or inactive, indicating that they, did not generate hazardous waste requiring disposal in 2017 or 2019. Additionally, no chemical containers, staining, or other indications of environmental conditions were observed during the Site visit.

- Wastebusters, 3837 East 40<sup>th</sup> Street – This location was included as a high-risk site due to its listing on the RCRA database. However, it is listed in both 2017 and 2019 as a not a generator verified or inactive status site and appeared to be closed during both site visits. Additionally, no chemical containers, staining, or other indications of environmental conditions were observed during the Site visit. This site is also located within the Aviation Parkway/Technical Drive Industrial Area recommended for a Phase I Environmental Assessment.
- Woodworking Enterprises, 3831 East 40<sup>th</sup> Street – This location could not be located during the 2019 site visit. The listed address was the delivery location for the Inter Fab facility recommended for a Phase I assessment. Therefore, a separate Phase I would not be needed for this address. This site is also located within the Aviation Parkway/Technical Drive Industrial Area recommended for a Phase I Environmental Assessment
- Freightliner Truck Repair/Sales, 5650 Travel Plaza – This was an unregulated site included as a high-risk site due to automotive repair activities and drum storage. Jacobs did not observe any outside storage of drums or other chemical or petroleum containers. The 2019 site visit did not indicate staining or other housekeeping issues that would warrant additional assessment at this location.
- Mechanic's Shop, 4687 Alvernon Way – Facility could not be located at the specified address or the mapped location (which appeared to be 4687 Ajo Way)
- Phase I Environmental Assessment is not likely to yield data to further evaluate the following two sites that involve spills or releases since they are located on roadways:
  - I-10, Mile Marker 265 (Alvernon Way) – 65-gallon release/spill from a tanker truck in 2009
  - I-10 and Alvernon Way – 9,500-gallon release/spill from a cargo truck in 1999

Jacobs recommends a records search at the Arizona Department of Environmental Quality for additional information on the cleanup activities undertaken to determine if additional activities are necessary at these sites.

Based on the updated review of the high-risk locations identified in the PISA, Jacobs recommends 14 sites for additional Phase I Environmental Assessment.

## Tables



**Table 1. Summary of Non-regulated Hazardous Materials Sites**

Name	Address	Field Verified (2019)	Comments from 2019 Site Visit
<b>High-Risk Sites</b>			
Aviation Parkway/Technical Drive Industrial Area	Multiple Locations	Yes	2019 observations consistent with 2017 observations including large amount of observed industrial activity, automotive repair, fuel tanks, and chemical storage
Cornwell's Truck Repair	7063 Craycroft	Yes	2019 observations consistent with 2017 observations of automotive repair activities
KE&G Construction	5100 Alvernon Way	Yes	2019 observations consistent with 2017 observations of a large construction lot containing equipment, vehicles, and generators; aboveground storage tank identified in 2017 not observed
<b>High-Risk Sites from the 2017 PISA Recommended as Low Risk based on the 2019 Review<sup>1</sup></b>			
Mechanic's Shop	4687 Alvernon Way	No	Referenced activity could not be located at the specified address or the mapped location in the PISA; this location is recommended for removal from the high-risk listing
Freightliner Truck Repair/Sales	5650 Travel Plaza	Yes	Jacobs did not observe any outside storage of drums or other chemical or petroleum containers; staining or other housekeeping issues also were not observed.
<b>Low Risk Sites</b>			
Water Pump Station	3880 Technical Way	No	
AT&T Tower	6771 Benson Highway	No	
Arizona Trucking Materials	4055 Ajo Drive	No	
Asphalt Pile in Median (ADOT)	IH-10 Milepost 268	No	
LP Gas Tanks	NW Intersect Elvira/Rex	No	
Recycling Center	3780 Ajo Drive	No	
Shell Station	3035 E Irvington	No	
HINO/Peterbuilt Trucks	755 Benson Highway	No	

<sup>1</sup> See text for additional information on suggested change of listing status

<sup>1</sup> PISA = Preliminary Initial Site Assessment





**Table 2. Summary of Sites Identified in 2019 Database Report**

Name	Address	Database(s)	Field Verified (2019)	Comments <sup>1</sup>
<b>High-Risk Sites</b>				
Inter Fab, Inc.	3050 S. Alvernon Way	RCRA, RCRAC	Yes	Entire property within project limits; RCRA compliance investigation has been closed; located in Aviation Parkway/Technical Drive Industrial Area and recommended for Phase I in Table 1
Arizona Truckomat Inc./Tucson Truck Terminal/Triple T Truckstop/ Tri State Motor Transit	5451 E Benson Highway	ERNS, UST, LUST, ADEQ HMI(2)	Yes	Entire property within project limits; USTs - 4 active, 3 temporarily closed, 23 closed (20 permanently removed); 7 LUSTs (closed from 1997 to 2019), one with undefined soil contamination; two diesel fuel releases (one release 30-40,000 gallons); monitoring wells observed at site in 2019;
Tucson Truck Terminal	5383 E Benson Highway	UST	Yes	7 active USTs; Appears to be included in 5451 E. Benson Highway based on database findings, site observations, and available maps
Tucson Southeast Company/ Century Link	6501 E Benson Highway	UST	Yes	Entire property within project limits, one UST removed in 1995; 3 gasoline powered generators in use;
Circle K #843	6750 S Craycroft	UST, LUST	Yes	Entire property within project limits; open gas station; 4 LUSTs closed in 1997
Greene Enterprises Drywall	3819 E Technical	UST, LUST	Yes	Entire property within project limits; LUST closed in 1997
Park Ave Shell	880 E Benson Highway	UST, LUST	Yes	3 closed LUSTs – (closed in 2013 and 2018); 2 open LUSTs with undefined soil contamination; 4 USTs removed, 1 temporarily closed
Tattoo Manufacturing Company	3761 E Technical Drive	UST, LUST	Yes	Entire property within project limits; LUST closed 1995; active facility
Quick Mart #29/Quick Break	3095 E Irvington	UST	Yes	Active gas station completely within project limits
Pilot Travel Center #593	5570 E Travel Plaza Way	UST	Yes	Active gas station/truck stop within project limits
Unocal 3888	821 E Benson Highway	UST, LUST	Yes	All in footprint; vacant August 2017; LUST closed 2002
<b>High-Risk Sites from the 2017 PISA Recommended as Low Risk based on the 2019 Review<sup>1</sup></b>				
HD Plumbing-HVAC LTD/Hughes Supply	4571 S Alvernon	RCRA	Yes	Entire property within project limits; RCRA status indicates no hazardous waste in 2017 or 2019 requiring; no staining, hazardous materials or wastes observed during 2010 site visit
HD Plumbing-HVAC LTD/Hughes Supply	4551 S Alvernon	RCRA	Yes	Entire property within project limits; no staining, hazardous materials, or wastes observed during 2010 site visit; RCRA status indicates no hazardous waste in 2017 or 2019 requiring

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Name	Address	Database(s)	Field Verified (2019)	Comments <sup>1</sup>
Waste Busters	3837 E 40th Street	RCRA	Yes	Entire property within project limits; appeared closed during August 2017 site visit.
I-10, Mile Marker 265 (Alvernon Way)	Not Applicable	ERNS	No	65 gallons of diesel spilled in soil of median in 2009
I-10 and Alvernon Way	Not Applicable	ERNS	No	9,500-gallon gas cargo tank roll and spill in 1999
Woodworking Enterprises	3831 E 40 <sup>th</sup> Street	UST	Yes	Entire property within project limits; The business could not be located during the 2019 site visit, and the address was the delivery location for the Inter Fab facility
<b>Low Risk Sites</b>				
Terminal Stations/Hattar Chevron;	6261 E Benson Highway	NFRAP, UST, LUST	No	LUST closed 2000/2007; USTs removed
Chevron Station 9	6301 E Benson Highway	RCRA, UST, LUST	No	LUST closed, abandoned, completely demolished; LUST closed in 2017
Anaconda Copper/ Arco Chemical	8000 S Kolb	NFRAP, RCRA(2), ADEQ HMI	No	
Swain Technology/ Metal Solutions	3778 E 43rd Place	NFRAP, RCRA, RCRAC	No	
Southwest Circuits	3760 E 43rd Place	NFRAP, RCRA, RCRAC	No	
Anadite, Inc	3832 E 37th Place	NFRAP, RCRA, VRP	No	
Chevron #9-8175/ Giant	1001 E Benson Highway	RCRA, UST, LUST	No	8 USTs removed or out of service; 2 LUSTs closed in 1996; 1 LUST closed in 2018
Arco No 5904	3601 S Park Avenue	RCRA, UST, LUST	No	1 LUST closed in 2002
Arnold Machinery Co	4620 S Country Club Road	RCRA	No	Abandoned in August 2017
Exxon Co USA 76390	5471 E Benson Highway	RCRA, UST, LUST	No	1 LUST closed in 2000
Dealers Auto Exchange/Manheim	7090 S Craycroft	RCRA(2)	No	
R&R Fabrication	7940 S Kolb Road	RCRA	No	
Sasol N.A. Inc/Sealox	7800 S Kolb Road	RCRA	No	Active plant with fuel ASTs
MER Corp	7960 S Kolb Road	RCRA	No	
Chevron Station 9 0965	3002 S 6th Avenue	RCRA, UST, LUST	No	LUST closed; USTs removed; under demolition, August 2017; 1 LUST closed 2017

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Name	Address	Database(s)	Field Verified (2019)	Comments <sup>1</sup>
Hiline Designs	3774 E 43rd	RCRA	No	
Tucson Outstanding Products	3770 E 43rd	RCRA	No	
Univar/Vopak/Van Waters/Haas/URS	3791 E 43rd Place	RCRA(4)	No	
Copper State Analytical Lab	710 E Evans Boulevard	RCRA	No	
CBC Drilling	750 E Evans	RCRA, UST, LUST	No	LUST closed 1994; USTs removed
Tucson Printed Circuits, Inc	770 E Evans Boulevard	RCRA, UST	No	
Ikon Office Solution/Kachina	816 E Evans Boulevard	RCRA	No	
Pima Welding Supply/Airgas	727 E Evans Boulevard	UST	No	Airgas in August 2017 with gas cylinders; UST removed
Costco #1079	1650 E Tucson Marketplace Boulevard	RCRA	No	Large quantity generator, October 2016
Sundt Corp	3901 E Irvington	RCRA, UST, LUST	No	LUST closed 2000; USTs removed
Generating Station/ Chevron	3950 E Irvington	RCRA, UST, LUST	No	LUST closed 1999; USTs removed
Equilon/Shell Oil/SFP Pipelines	3755 Refinery Way	RCRA, UST, ADEQ HMI	No	40-gallon fuel spill 1990
SFPP LP Tucson Terminal	3841 E Refinery Way	RCRA, ERNS, UST	No	75-gallon gas spill 2015; USTs removed
Chevron Tucson Terminal	3865 E Refinery/3865 Ajo	RCRA, UST, LUST	No	LUST closed 1994; USTs removed
Coastal Transport, Inc	3833 S Contractors Way	RCRA, UST	No	
Hydraulic Systems, Inc	4617 S Contractors Way	RCRA	No	
Southwestern Paint & Varnish	3765 E Aviation Highway	RCRA	No	
McKenzie Paint Co, Inc	3845 E Aviation Highway	RCRA	No	
Coronados Collisions	3841 E 38th Street	RCRA	No	
The Burke Co 14	3722 E 37th Street	RCRA, UST	No	
I-10 at 6th Ave	Not Applicable	ERNS	No	Small, 40-gallon diesel leak, 1994
Davis Monthan Air Force Base	Not Applicable	Arizona Superfund	No	Active in DoD Program; no hazmat seen near project area

**Table 2. Summary of Sites Identified in 2019 Database Report**

Name	Address	Database(s)	Field Verified (2019)	Comments <sup>1</sup>
Union Pacific Railroad	Aviation and 36th	VRP	No	VRP closed 2009
Catalina Mechanical Contracting	2702 S Alvernon	UST	No	
Blue Circle West, Inc	4724 S Alvernon Way	UST	No	Only fenced area remains; USTs removed 1988
Horizon/Suddath Moving	3600 E 36th Street	UST	No	3 USTS removed in 2019
Elmer Hays Roofing	2638 S Alvernon Way	UST, LUST	No	LUST closed 1997; USTs removed 1995
Hatco Inc	3901 S Contractors Way	UST	No	
Ed Holderness Supplies	3502 E 34th	UST, LUST	No	
Mitchell's Furniture Group	3450 S 34th Street	UST	No	
Nicholas Plumbing	3002 E Michigan	UST	No	
ADOT/E-Z Fill	3345 S Park Avenue	UST	No	No development remaining at this address
Sinclair Retail	3231 S Park Avenue	UST	No	No development remaining at this address
South Tucson Hospitality	3255 S 4th	UST, LUST	No	LUST closed 1997; USTs removed 2000
Romanoski Glass & Mirror	3670 E 37th Street	UST	No	
Rollins Leasing Corp	3655 E Refinery Way	UST	No	
Pima County Highway Dept	2900 S 6th	UST, LUST	No	LUST closed 2001; nothing seen at address August 2017
Northern Pipeline Construction	4415 S Contractors Way	UST, LUST, VEMUR/DEUR	No	LUST closed 1994
Action Scaffolding	3702 E 37th Street	UST	No	
ADOT Right-of-Way	101 E Benson	UST	No	Nothing observed in field August 2017
Atlas Van Lines	3133 S Dodge Boulevard	UST	No	
ADOT	3505 E Aviation Parkway	UST	No	
Catalina Roofing	3635 E Refinery Way	UST, LUST	No	LUST closed 1995
Valencia Chevron Facility	5000 E Valencia Road	UST	No	
City Doors	2901 S 6th Avenue	UST	No	Property undeveloped August 2017

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MJ I-10 Shell	7710 S Wilmot	UST	No	
Fast Lane Chevron	1999 E Ajo Way	UST	No	
Circle K 2703387	4650 S Palo Verde	UST	No	
Circle K Store 2703391	3301 S 6th Avenue	UST	No	
Roadrunner Trucking	I-10 EB MP 269.9	ADEQ HMI	No	Diesel/truck, 1993
Bob's Material Trucking Co	I-10 at 6th Avenue	ADEQ HMI	No	Diesel/truck, 1994
Southern Pacific Railroad	WB I-10 MP 261	ADEQ HMI	No	Ground pecan shells (powder), 1995
Carnegie Cafe and	Catering I-10 Exit 268	ADEQ HMI	No	120 gallons of diesel from tanks
Tucson Fuel Co.	I-10 and Alvernon On Ramp	ADEQ HMI	No	8,600 gallons of gasoline from tanker, 1999
City of Tucson	I-10 and Irvington Road	ADEQ HMI	No	175 gallons of sodium hypochlorite from AST, 2000
Butterfield Tech Center	NEC Irvington and Palo Verde	ADEQ Dry Well Registration	No	No drywells seen near project area in 2017
Abandoned Drywell	3159 S Alvernon Way	ADEQ Dry Wells Registration	No	No drywell observed in August 2017
G&K Services	3724 E 37th Street	Drycleaners	No	
Valero Corner Store #1657	4685 East Valencia	UST	No	3 USTs <sup>3</sup>

**Table 2. Summary of Sites Identified in 2019 Database Report**

Name	Address	Database(s)	Field Verified (2019)	Comments <sup>1</sup>
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<sup>1</sup> Comments from the 2017 PISA were updated to include changes from the 2019 database report and 2019 site visits, where applicable. Site observations for “low risk” sites are from the 2017 site visits.

<sup>2</sup> See text for additional information on suggested change of risk status

<sup>3</sup> Site added from 2019 database report

ADEQ = Arizona Department of Environmental Quality

AST = aboveground storage tank

DoD = U.S. Department of Defense

ERNS = Emergency Response Notification System

HMI = human-machine interface

LUST = leaking underground storage tank

NFRAP = No Further Remedial Action Planned

RCRA = Resource Conservation and Recovery Act

RCRAC = RCRA Corrective Action

UST = underground storage tank

VRP = Voluntary Remediation Program

VEMUR/DEUR = voluntary environmental mitigation use restriction/declaration of environmental use restriction