Remediation of Manufactured Gas Plant Sites in Arizona

Judy Heywood Arizona Public Service Company

16th Annual EPAZ Conference March 4th 2020



Outline

- Background Manufactured Gas Plant (MGP)
- Environmental impacts
- APS MGP program
- ADEQ VRP
- Remedial strategies
- Key remediation activities and challenges
 Community involvement
- Status on the road to closure



Background – Manufactured Gas Plant (MGP)

- What is an MGP
- How APS is connected to MGP's
- Where are these MGP sites
- What APS has done to address these sites



What is an MGP

- Prior to the development of natural gas & electricity, gas was manufactured
- Used either coal or oil to produce synthetic gas for lighting and heating
- From the late 1800s to the 1940s/1950s over 1500 MGP sites operated in the U.S.
- 13 MGP sites operated in Arizona



MGP Environmental Wastes

Wastes Generated

- Coal tar
- Lampblack
- Residual fuel oil

Contaminates of Concern

- Polyaromatic hydrocarbons (PAH)
- Volatile organic compounds (VOC)
- Total petroleum hydrocarbons (TPH)



Potential Environmental Impacts

- Soil
- Groundwater
- Surface Water
- Air
- "Free Product" Residual Oil
 - DNAPL
 - LNAPL



Arizona MGP Sites

13 MGP sites in Arizona

9 MGP sites have corporate predecessor ties to APS





The APS Connection - How APS is Connected to MGPs

Predecessors to APS operated 9 sites

- APS Acquired the MGP Sites Along With Electric Generating Facilities to form APS
- APS Sold the Natural Gas Portion of the Business but Retained the Responsibility for the Environmental Impacts at These Sites.



What has APS Done

Developed MGP remediation program

- 1st Step Identify and characterize the sites
 - Identify Sites 1987-1990
 - Identify environmental impacts 1990-1998
 - Evaluate potential hazards to public and workers 1992-1998
 - Enter AZ Department of Environmental Quality Voluntary Remediation Program (ADEQ VRP)
 - Develop community communication plans



What has APS Done

- 2nd Step Implement interim remedial measures where needed
- 3rd Step -Prioritize the sites for remediation
 - Focused feasibility studies 1998/2010
 - Human health risk assessments
- 4th Step Implement remediation plans 1997
- 5th Step Complete remediation program with ADEQ VRP Close out - 2020



ADEQ Voluntary Remediation Program

- Allows parties to work cooperatively with ADEQ to remediate contaminated sites with review and approval of ADEQ.
- Encourages property owners and other interested parties to voluntarily invest resources in restoring contaminated sites as quickly as possible to specific health-based standards.



ADEQ Voluntary Remediation Program

- ADEQ VRP will invoice APS for the time ADEQ staff spends reviewing the work plans, remediation plans, conducting site visits, and reviewing the reports documenting the remediation and ultimately approving the completion and closure of the project
- APS is solely responsible for all of its ADEQ VRP oversight costs.



APS Remediation Strategy

- Remediate the sites to levels that are protective of human health and the environment
- Due to the nature of the contaminants, there are limited technologies available to achieve these goals.
- Since APS does not own the majority of MGP sites, We cannot control use and access of the sites.
- Excavation was selected as the preferred remedy for the MGP sites



MGP – Remediation Strategy

- Excavate impacted soil
- Transport impacted soil to appropriately permitted landfill
- Collect confirmation samples to ensure all impacted soil is removed
- Excavate soil to residential cleanup levels and achieve clean closure
- Backfill property with clean soil
- Restoration site specific requirements



Clean Up Goals

- Arizona Department of Environmental Quality Voluntary Remediation Program
- Soil remediation levels (SRLs)
 - Health-based risk levels
 - Residential and non-Residential
- Groundwater protection levels (GWPLs)
 - Calculated cleanup levels protective of groundwater quality
- Surface water standards



Site Cleanup Criteria

Excavation of impacted soil

- ADEQ Soil remediation levels (SRLs)
 - Health-based risk levels
 - <u>Residential SRLs</u>
 - PAHs (BAP 0.69 mg/kg)
 - Benzene (0.65 mg/kg)
- Groundwater protection levels (GPLs) ADEQ
 - Calculated cleanup levels protective of groundwater quality
 - PAHs (BAP GPL is greater than RSRL of 0.69 mg/kg)
 - Benzene (1.04mg/kg)



- ADEQ Approval
- Access
- Utility Coordination
- Permitting
 - Air
 - Groundwater
 - Surface Water
 - County/City



- Archeological reviews
- Endangered species evaluation
- Jurisdictional waters evaluation
- Soil & waste treatment & disposal
- Unrelated environmental issues asbestos/lead paint



- Safety issues
 - Environmental hazards
 - Construction safety
 - Health & safety plan
 - Site safety officer
 - Daily safety meetings
- Safety issues air
 - Worker
 - Adjacent area residents/commercial
 - Odor



Safety Applies to Everyone









- Engineering Issues
 - Structural support shoring
 - Underground utilities
 - Monitoring/Survey
- Determining "When Are You Clean ?"
 - Confirmation sampling/decision units



Air Monitoring

- Monitoring program and equipment
- 2 Types of air monitoring:
 - Real time direct read instruments
 - Perimeter monitoring
 - Two locations up and down gradient
 - High volume puff samplers for PAHs
 - Summa canister for benzene



Air Monitoring





Odor and Dust Control Measures

- Covering non-active area with plastic
- Use of water to control dust
- Use of odor suppressants/foam to reduce odors
- Use of water misting system on boundary of site
- Minimize stockpiling of contaminated soils
- Minimize size of open excavation





Odor Suppression Foam







Dust Control





Misting System





Challenges

- Excavation is only option to reach cleanup criteria goals
- No site plans or as builts
- No operational records
- Don't really know what you have until you start excavating
- Utility coordination
- Clean backfill what is clean and how do you verify
- Restoration delusional visions
- Road closure nightmares
- Weather heat cold flooding
- Bid specifications be prepared for the unknown/unplanned



501/505 Phoenix - Results

Volumes removed:

- 12,747 tons of soil removed as an AZ
 Special Waste –
- 301 tons exceeding the TCLP disposed of in a hazardous waste landfill
- Confirmation soil samples: 111
- All soil samples were below the residential SRLs with the exception of the limited amount of impacted soil remaining in inaccessible areas



Manufactured Gas Plant: A history of service to Phoenix

Historical photos of manufactured gas plant





MGP operated from 1897 to 1937. APS acquired the site from Central Arizona Light and Power Company in 1954, and currently operates a utility service yard there. MGP operated using the Oil Gas Process – waste primarily lampblack. Lampblack transported from MGP to settling basins at Grant Street Site via wagon then by Pipeline







501/505 Phoenix MGP







Lampblack Pipeline to Grant Apts.





Grant Street Yard – Phoenix Results

- Volumes removed:
 - 60,332 tons of soil removed as an AZ
 Special Waste
- Confirmation soil samples: 151
- All soil samples were below the residential SRLs.



Grant Street Site

- Size approximately 2 acres
- Two-story building with 52 apartments surrounding an interior courtyard
- Surrounding land use mixed residential /industrial



Grant Street Remediation Project Timeline









Grant Park Apartments

Prior to Installation of Courtyard Cap

The first

Courtyard Cap Installed



MINING IN
Courtyard Cap Installed









Aerial - 1930





Aerial - 1946



Elements / Challenges of Remedial Action Plan

- Residential neighborhood
- Deep impacted soil large diameter auger removal
- Lack of documentation/structures
- Heat start May 22, 2017 safety
- Impact of heat on MGP odor
- Availability of "clean" backfill
- Use of foam, bio-solve, fence line misting



Grant Excavation Plan



WEST SHERMAN STREET

Notes:

 Decision Unit boundaries are approximate and may be modified based on conditions encountered during excavation. Decision units will not exceed ¼- acre (10,890 ft²) in area.

DU-1B (Decision Unit 1 with bottom)

DU-1S (Decision Unit 1 with sidewall)



FIGURE 6-5 **Proposed Decision Units** APS Grant Street Yard Former MGP Site Phoenix, Arizona

ch2m:





Large Diameter Auger Deep Soil Removal





Large Diameter Auger







Large Diameter Auger















Community Communication Plan/Outreach

Elements included

- Identification of stakeholders
- Develop talking points and briefing schedule
- Material project timeline, newsletters, door hangers, community meetings, door-door contacts,



T STREET REMEDIATION PROJECT

Neighborhood Update

FOR MORE INFORMATION

udy Heywood APS Environmental Department Phone: (602) 250-3850 Imail: judith/heywood@aps.com

Questions about the ADEQ-approved w plan can be directed to (602) 771-2300 or (800) 234-5677. All other inquines,

omments or concerns can be directed to

Ultimas Noticias Vecinos

Presented Standard Mail & Redage Raid Process, AZ GRANT STREET REMEDIATION WORK UNDERWAY

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PARA OBTENER MÁS INFORMACIÓN

comentarios o inquietudes pueden dirigirse a:

Judy Heywood Departamiento de Medio Ambiente de APS Teléfono: (602) 250-3850 Emait: judith.heywood@aps.com

Las preguntas relacionadas con el plan de trabajo aprobado por ADEQ pueden dirigirse al (602) 771-2300 o al (900) 234-5677. Todas las otras solicitudes,

WURK UNDERWAY AVIs contraction have darked analyside by historic direct Sound to make a start and a start and the or if and, which have appointed by the Antonia Department of invincented calculary through the Unitary Bi Bienediation Program, more using excavators, bachness and a start performed likinown as an auger to excavate the property.

The top five feet of soil will be removed from the entire site. Several areas will be excavabed to depths of 20 to 25 feet. An area near the northwest corner of the property will require removing the soil with an auger to as deep with teach as 40 feet.

Crews will be collecting and testing soil samples throughout the process to ensure thorough remediation The excavated soil will be transported to an appropriate permitted landfill and replaced with clean fill dirt. By excavating and removing impacted soil, APS anticipates achieving clean closure and unrestricted future use of the property.

All excavation work is scheduled to be comp A variety of options for the property's future use are being considered, but no official plan has yet been determined.

MINIMIZING IMPACT ON THE COMMUNITY MINIMULTING IMPACT ON THE COMMUNITY Prior to starting escavation, APS installed an air quality monitoring unit that provides real time dats. Consultant also walk the perimeter of the site each workday with handheid air quality monitoring devices.

Several measures are being used to control dust and odors, particularly during morecon season. Minimizing surface piles of impacted soil and a misting system along the perimeter fence prevent dust from ving off site. Trucks also are checked before lear the site so materials are not unintentionally transferred to the street.

MGP by-products can have a smell similar to mothball or old "oil fuel." A white spray-foam is applied, when needed, to reduce odors. APS mapped out a route for trucks using Lincoln Street

Seventh Street and Seventh Avenue. No materials are being transported through residential areas. se the project requires using heavy equipment, Avenue between Grant and Sherman streets will

continued on page 2

EN MARCHA OBRAS DE DESCONTAMINACIÓN EN GRANT STREET

EN GRANT STREET Las constitutios de 1479 han comenzado la escavación en 331 West Granz Storet puar retrair la terra impactada por las operaciones de la histórica planta de gias manufactanzas (HSR). El alcance da trabaja, mamo que ha sida aproceso por el Departamento Cadada Antoniza da Antonia a trabaja de Programa Cadada Antoniza da Antonia a trabaja de Programa cadendo en este de cue una barrena para escava la propedente demetro es deci, una barrena para escava la propedente comento en entre da para escava la programa.

camero, eo deol, una barrena para excavar sa propietada Los primeros cincos pleis de la superficio serán removidos de todo el sito. Em varias áreas se escavará a una profundidad de 20 a 25 pies y en una zona cerca de la exguina norseette de la propiedad será necesario retrar la tierra con una barrena a una profundidad de 40 pies. Durante todo el proceso, las cuadrillas de trabajadores olectarán y harán pruebes de la tierra para garantizar ma limpieza completa. La tierra extraída será transpor a un vertedero autorizado y el terreno se rellenará con

Al excavar y retirar la tierra co taminada, APS anticipa lograr un cierre limpio y el uso futuro de la propiedad in restricciones.

Todas las obras de excavación están programadas para concluir en un año. Se considera una variedad de opcione para el uso futuro de la propiedad, pero todavía no se ha erminado un plan oficial

MÍNIMO IMPACTO EN LA COMUNIDAI

vecesario, para reducir estos olores

WINMO IMPACTO EN LA COMUNIDAD Antes de iniciar la escavación, APS instaló una unidad de emitiareo de la calidad del aire que ofrece información en tiempo neal. Además, un grupo de consutores recorre o perimetro del sitio todos los del de trabajo con dispositivos manuales de monitoreo de la calidad del aire. Se tomaron varias medidas nara controlar el nolvo s olores, particularmente durante la temporada

El minimizar las pilas de tierra contami sistema de nebulización a lo largo de la valla del perimetro. npiden que el polvo salga del sitio. Los camiones tambié n revisados antes de salir del sitio para que no transporter materiales por las calles fuera del horario establecido Los productos derivados de la planta MGP pueden tener un olor similar al de las bolas de naftalina o a combustib viejo. Se aplica un rociador a base de espuma, cuando el

cont

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be closed for the duration of excavation work. Barricades have been installed to allow access for large trucks removing excavated soil and delivering clean fill dirt.

In June, a City of Phoenix water line incorrectly marked as disconnected was struck, affecting water flow to about 10 homes. The situation was reported immediately to the City, and water service was

fully restored within an hour. Desidents in the affected area were offered bottled water in the meantime Remediation work occurs only

on weekdays and adheres to the hours of operation outlined in the Phoenix Charter and City Code

CS#170703

GRANT STREET LEGACY PROPERTY

The Grant Street property has had a variety of uses From 1917 to 1937 it was used to store by-products from operations at the nearby MGP. It was later used as an APS service yard and for pole treatment, before being sold in 1971 and developed as Grant Park Apartments.

The current remediation project is the last step in an extensive environmental process that started 30 years ago.

Between 2001 and 2003, while the apartments were occupied, APS elected to implement an interim remedia action plan to isolate MGP materials and prevent contact. Residents were successfully relocated in 2015, APS

provided resources to support the HUD-approved relocation process and purchased the property in October 2015.

Once the apartments and other surface structures were removed, APS was able to conduct an environmental assessment that shaped the final remediation plan.



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de aqua de la Ciudad de Phoenix marcada de manera incorrecta como "desconectada" fue golpeada, afectando el flujo del agua

a alrededor de 10 hogares. La situación se reportó de inmediato a la Ciudad y el servicio de agua se restauró ompletamente en el plazo de una hora. Los residente en el área afectada recibieron agua embotellada mientras se arreglaba la tubería.

APS trazó una ruta para

calles: Lincoln Street,

Seventh Street v Seventh

venue. Ningún materia

que los camiones de carga

circulen por las siguientes

Los trabaios de descontaminación se realizan solamente durante los días hábiles y durante las horas de operación especificadas en los Estatutos y el Código de la Ciudad de Phoenix.

EL LEGADO DE LA PROPIEDAD DE GRANT STREET

La propiedad de Grant Street ha tenido una variedad de usos Entre los años 1917 y 1937 se utilizó para almacenar los productos derivados de las operaciones de la planta MGP cercana. Posteriormente se usó como un patio de servicio y tratamiento de postes de APS, antes de ser vendida en 1971 para el desarrollo de un complejo habitacional, Grant Park Apartments.

El proyecto de descontaminación actual es el último paso de un extensivo proceso ambiental que se inició hace 30 años.

continúa en la pagina 3

HISTORIC MANUFACTURED GAS PLANT

MGP facilities were common in the U.S. beginning in the late 1800s. Of the approximately 1,500 MGPs across the country, 13 were located in Arizona, including eight operated by APS predecessor companies. The APS property at 501 S. Second Ave, was the original site of the downtown Phoenix MGP, which operated from 1897 to 1937. The facility burned oil to produce a synthetic

> gas primarily used to light Phoenix street lamps. MGP materials are mostly inert, meaning they are not likely to move elsewhere on the property or to adjacent land. Residues found at some MGP sites are composed of many chemicals, including polycyclic aromatic hydrocarbons (PAHs) and volatile organic compounds (VOCs). PAHs are formed from the incomplete burning of materials such as oil. Some of the materials in MGP by-products may present health or environmental concerns if direct and substantial contact with the residues were to occur.

Interim remediation work completed while the Grant Street anartments were occupied provided a barrier to prevent contact with MGP materials. As part of its commitment to being protective of huma

health and the environment, APS has been working with oversight from ADEQ to remediate the Grant Street property, along with its other MGP sites.

Entre 2001 y 2003, mientras los departamentos estuvieron ocupados, APS decidió implementar un plan de acción de descontaminación temporal para aislar los materiales MGP y evitar el contacto.

En 2015 los residentes fueron reubicados con éxito APS proporcionó recursos en apoyo del proceso de eubicación aprobado por HUD y compró la propiedad en octubre de 2015.

Una vez que se demolieron los departa y otras estructuras de la superficie, APS pudo conducir una valoración ambiental que definió el plan de ontaminación final.

PLANTAS HISTÓRICAS DE GAS MANUFACTURADO

A finales de los años 1800, las instalaciones MGP eran omunes en los Estados Unidos. De las aproximadam 1500 plantas MGP en todo el país. 13 se localizaban en Arizona, incluyendo 8 operadas por compañías predecesoras de APS.

La propiedad de APS ubicada en 501 S. Second Ave., era el sitio original de la planta MGP del centro de Phoenix, la cual operó de 1897 a 1937, Las instalaciones quemaban aceite y gas para producir un gas sintético que e utilizaba principalmente en el sistema de alumbrado público de Phoenix.

Los materiales derivados de la planta MGP están en su mayoría inertes, esto significa que no se dispersan en la propiedad o hacia los terrenos adyacentes. Los siduos encontrados en algunos sitios MGP contiener muchos químicos, incluyendo hidrocarburos aromáticos policíclicos (HAP) y compuestos orgánicos volátiles (COV). Los PAH son el resultado de la combustión incompleta de materiales como el aceite. Algunos de los materiales de los productos derivados de una planta MGP pueden representar un riesgo para la salud humana y los recursos aturales, sobre todo cuando ocurre un contacto directo v substancial

Las obras de descontaminación temporales, realizadas mientras los departamentos estuvieron ocupados, crearon una barrera para evitar el contacto de los residentes con los materiales MGP.

Como parte del compromiso de proteger la salud de los humanos y del medio ambiente, APS ha estado trabajando con supervisores de ADEQ para descontaminar la propiedad de Grant Street, junto con sus otros sitios MGP.



barricadas para permitir el acceso de camiones de carga pesada que retiran la tierra contaminada y entregan tierra de relleno limpia. En junio, una tubería

can be sprayed easily onto



se transporta a través de áreas residenciales Debido a que el proyecto requiere el uso de equipo pesado, la calle Fourth Avenue entre Grant y Sherman, estará

🧶 aps[.]

Remediation at Grant Park Apartments Site

Safety and respect for the environment, guide APS and its employees every day. That's why the company is conducting remediation on the site of the former Grant Park Apartments. The project will remediate by-products produced by a manufactured gas plant (MGP), which operated near the site from 1897 to 1937. APS will complete the work under the supervision of the Arizona Department of Environmental Quality's Voluntary Remediation Program.



Impacted soil will be excavated and replaced with clean fill dirt. ADEG will provide oversight of the work. The public will be able to review and comment on the Remedial Action Plan prior to ADEG approval.

Step 5: Project Completion (early 2017)

Once required soil levels are achieved and the ground is restored, the remediation project will be complete.

This remediation project is the final step in an extensive environmental process that started nearly 30 years ago. APS has taken possession of the property and will begin study of the soil to complete the remediation.

For questions regarding the relocation process: Jessica Raymond, The Atlantic Group (480) 256-0506 or jraymond@atlanticdev.com. For questions on remediation: Judy Heywood, APS (602) 250-3850.

CS#1509/055 10/13/15

Remediation work beginning this summer at Grant Street site May 2017

Dear Neighbor:

Our team is gearing up to start remediation of a property located at 331 W. Grant St. Within the next few weeks, you will see trucks, materials, fencing and large equipment such as excavators and backhoes arriving at the site.

Crews will install air quality monitoring equipment and set up dust and odor controls before removing asphalt and concrete covering much of the site. Excavation is scheduled to start in June.

Because the project requires using heavy equipment, Fourth Avenue between Grant and Sherman streets will be closed for the duration of excavation work. Barricades will be installed to allow large trucks to remove excavated soil and deliver clean fill dirt. APS anticipates completing remediation this year.

APS will be on site each day. Remediation work will be executed by ENTACT, a construction firm specializing in environmental clean up.

All work is being conducted in accordance with the Arizona Department of Environmental Quality Voluntary Remediation Program. Information, including the approved work plan, is available online at http://www.azdeq.gov/ VRP/StRemediation/GrantStreetVard

Questions about the VRP or approved work plan can be directed to (602) 771-2300 or (800) 234-5677. All other inquiries, comments or concerns can be directed to:

Judy Heywood

CS#1706088

APS Environmental Department Phone: (602) 818-0259 Email: judith.heywood@aps.com



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Grant Street Remediation



APS is cleaning up a downtown Phoenix site at 331 W. Grant Street which was once used to store by-products from a historic manufactured gas plant.





Prescott - Results

- Volumes removed:
 - 101,000 tons of soil removed as an AZ
 Special waste for thermal treatment or landfill
 - 50 tons hazardous waste
 - 800,000 gallons of water treated
- Confirmation soil samples: 232
- All soil samples were below the residential SRLs with the exception of the limited amount of inaccessible soil remaining under the substation.



Prescott MGP











Shoring





Gas Holder



Cyanide Staining







Monsoon Storms









Confirmation Sampling Locations





Park Master Plan













Yuma - Results

- Volumes removed:
 - 36,904.7 tons of soil removed as an AZ
 Special Waste
 - 815,767 gallons of water treated
- Confirmation soil samples 126
- All soil samples were below the residential SRLs with the exception of the limited amount of inaccessible soil remaining under the water treatment cells and railroad track.



Yuma MGP





Yuma MGP 1929





Existing Aerial Site Photo





Former MGP Site Map





Yuma Shoring Along Railroad







LNAPL







Confirmation Sampling Locations



aps

Globe - Results

- Volumes removed:
 - 28,700 tons of soil removed as an AZ Special Waste
 - 33.88 tons exceeding the TCLP disposed of in a hazardous waste landfill
- Confirmation soil samples: 96
- All soil samples were below the residential SRLs.



Manufactured Gas Plant: A History of Service to Globe

Globe Electric Light & Gas Company built the MGP in 1905 & operated it to 1912 1912 - 1925 Globe Light and **Power Company** 1925 – 1940s Arizona Edison Company 1948 Globe MGP was dismantled



MESQUITE STREET


Globe MGP Circa 1907





Globe MGP Circa 1911



S

Proposed Excavation Plan





Shoring Along Railroad





Confirmation Samples





Pinal Creek Flood Event – Before







Flood Event





Flood Event

Media Coverage of Flood



comed surprise to most, however on the corner of Mesquite and Pine at the site of the old it was anything but a pleasant flowed into Pinal Creek. surprise.

Water was flowing into and where extraction of contami- week. nated soil is taking place and then is scheduled to be filled monitor the site." with clean fill dirt that meets The Arizona Silver Belt has residential standards.

creek became quiet a possibil-

ation Project Manger stated, "Part of our job at APS is to be While the runoff we experienced as a result of an extensive well. amount of rainfall in a very short time frame on Friday cer-

our site was deverted."

"Because the majority of impacted soil had been excavated Globe Electric Light and Gas and removed from the site, it Company where an extensive does not appear that a significlean up has been taking place cant amount of impacted soil

However, we have taken samples from the creek and expect out of the construction site to know the results later this

We will continue to closely

asked to receive a copy of the Equipment was flooded by test results on the Pinal Creek the water, and concerns of con- once they are received so that taminated soil reaching the we can inform our readers as to the safety of the creek.

When asked about ground Judy Haywood, APS Remedi- water, she stated that she has no reason to believe that contamination has made to it the ground prepared for any contingency. water, but that they will also continue to monitor the water as

As far as the digging at the site is concerned Judy Haywood tainly is unusual, our response added, "We are going to keep



Janette Kimbrough/Arizona Silver Belt

Center

Friday afternoon showers brought large amounts of rain in a short period of time causing the local area creeks to flow. By the time the rains decreased the site of contaminated soil removal being preformed by APS was under water as the creek entered the work site







Miami - Results

- Volumes removed:
 - 12,000 tons of soil removed as an AZ Special Waste
- Confirmation soil samples: 80
- All soil samples were below the residential SRLs with the exception of the limited amount of impacted soil that was inaccessible under transite water line.



APS MGP Sites – Status

- Bisbee Location -Copper Queen Mine
- Phoenix 2 Sites Closed
- Prescott Completed 2001
- Yuma Completed 2003
- Globe Completed 2009
- Grant Street Completed 2017
- Miami Completed 2020
- Douglas Underway 2020



Lessons Learned

- Community involvement communications plan – robust and flexible – open and transparent
- Check your preconceived site model at the gate

