



MEMORANDUM

Date: April 4, 2018

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator

A handwritten signature in black ink, appearing to read "CHH", is written over the printed name "C.H. Huckelberry".

Re: **El Camino del Cerro Landfill**

Some time ago, the County Attorney discussed various liability insurance policies available regarding remediation necessary for the El Camino del Cerro Landfill and another landfill the County is involved in with the Arizona Department of Environmental Quality (ADEQ). I asked the Risk Management Department to provide a summary update of the County's activities regarding landfill remediation, specifically for El Camino del Cerro. The attached March 27, 2018 memorandum from the Risk Manager provides the update.

In summary, it is our opinion that groundwater contamination emanating from the landfill has been almost fully remediated at our cost. There are other sources of groundwater contamination in the vicinity due to previous private activities, including oil recycling (including disposal into unlined trenches and lagoons), auto salvage and truck and heavy equipment maintenance activities. The current ADEQ published remediation investigation has concluded that the landfill was the primary source of groundwater contamination for the entire area. The County strenuously disagrees with ADEQ's conclusions. We have provided extensive technical documentation of the errors in fact and interpretation of data as well as omissions and confusing statements in their remedial investigation. If this remedial investigation and feasibility report are not altered by ADEQ, the County will challenge the findings of the report and the allocation of expenses to responsible parties.

CHH/anc

Attachment

c: Tom Burke, Deputy County Administrator for Administration
Carmine DeBonis, Jr., Deputy County Administrator for Public Works
Ursula Nelson, Director, Pima County Department of Environmental Quality
Lauren Eib, Risk Manager, Finance and Risk Management



PIMA COUNTY
FINANCE & RISK MANAGEMENT

Date: March 27, 2018

From: *J. P. Pizarro for*
Lauren Eib
Division Risk Manager

To: C.H. Huckelberry
County Administrator

RE: Response to March 6, 2018 CHH Memo

Pima County has taken several steps over the past 20 plus years to remediate contamination at the former El Camino del Cerro (CDC) landfill. Remediation started with operation of a soil vapor extraction system from 1997 to 2001 to remove landfill gas containing volatile organic contaminants (VOCs). Subsequently, the County operated a groundwater remediation (pump and treat) system to remove VOCs from June 2009 to October 2017. The pump and treat system was turned off after data showed the groundwater treatment had effectively reduced VOC concentrations to very low levels. We will continue to conduct periodic groundwater monitoring and provide summary reports and analyses to ADEQ.

The CDC landfill was originally considered its own Water Quality Assurance Revolving Fund (WQARF) site by ADEQ. ADEQ considered the Shannon Road site, located east of I-10, another separate WQARF site. In 2004 the sites were administratively combined by ADEQ into the Shannon Road/El Camino del Cerro WQARF site. The County's remediation efforts have been limited to the west side of I-10 in and adjacent to the former landfill.

Pima County has not conducted any remediation activities at the Shannon Road portion of the site located east of I-10. The Shannon Road WQARF site includes the Wrecksperts and E.C. Winters properties and the Metro Water South Shannon well. Remediation of lead contaminated soil at the Wrecksperts property was performed by ADEQ in 1996. Soil vapor extraction at the E.C. Winters property was operated by ADEQ from 2006 – 2008. Metro Water continues to treat water at their South Shannon well using carbon removal of VOCs.

ADEQ has published the remedial investigation (RI) and the feasibility study (FS) reports. ADEQ has determined that the former CDC landfill is the primary source of groundwater contamination for the entire site including contamination on the east side of I-10 where Wrecksperts, E.C. Winters and numerous other industrial operations were located. ADEQ, in their RI report, determined that none of these sites east of I-10 are significant contributors to groundwater contamination. We have provided extensive technical comments identifying errors in facts and interpretation, as well as omissions and obfuscations in the RI report. These comments included evidence of contamination from other sources including Wrecksperts and E.C. Winters. To date ADEQ has not made any changes in response to our comments.

We have reached out to ADEQ on numerous occasions to discuss settlement options, coordination of work activities, sources of contamination and identification of other potentially responsible parties. ADEQ has not shown any interest in such cooperation. ADEQ is reportedly investigating other responsible parties, but they refuse to share such information with the County claiming such information is privileged at this time.

Our first opportunity to mount any legal challenge to ADEQ findings will be in response to ADEQ's proposed allocation of expenses to the responsible parties. ADEQ's schedule has been erratic but we hope to have the information in the next 12 months.

We are available at your convenience to discuss this project.

C: Tom Burke, Deputy County Administrator
Keith Dommer, Finance & Risk Management Director
Ursula Nelson, Environmental Quality Director