



PIMA COUNTY

WASTEWATER RECLAMATION

Roger Road Wastewater Reclamation Facility Brownfield Cleanup

Brownfields Cleanup Grant Application by Pima County, Arizona, November 13, 2023

- 1. Applicant Identification** Pima County Regional Wastewater Reclamation Department
201 N Stone Ave
3rd Floor
Tucson, AZ 85701
(520) 724-6500
<https://www.pima.gov/1766/Wastewater-Reclamation>
- 2. Funding Requested**

 - a. Grant Type** Single Site Cleanup Grant
 - b. Federal Funds Requested** \$492,681
- 3. Location** City of Tucson, Pima County, State of Arizona
- 4. Target Area and Priority Site Information** Santa Cruz River Corridor, Census Tracts 04019004515, 04019004514, 04019001200, 04019001100, and southern portion of 04019004418.
Roger Road Wastewater Reclamation Facility
2600 West Sweetwater Drive,
Tucson, AZ 85705
- 5. Contacts**

 - a. Project Director:** Kimberly Baeza
Water Campus Floor 1
2955 W Calle Agua Nueva
Tucson, AZ 85745
(520) 724-6480
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 - b. Chief Executive** Jackson Jenkins
201 N Stone Ave
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Tucson, AZ 85701

(520) 724-6500
jackson.jenkins@pima.gov

6. Population 1,052,000

7. Other Factors Checklist

| Other Factors | Page # |
|---|---------------|
| Community population is 10,000 or less. | NA |
| The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory. | NA |
| The priority site(s) is impacted by mine-scarred land. | NA |
| The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | Page 2 |
| The priority site(s) is in a federally designated flood plain. | NA |
| The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | Page 3 |
| The reuse of the priority site(s) will incorporate energy efficiency measures. | Page 3 |
| The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments | Page 3 |
| At least 30% of the overall project budget will be spent on eligible reuse/areawide planning activities, as described in Section I.B., for priority site(s) within the target area(s). | NA |
| The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing. | NA |

8. Letter from the State or Tribal Environmental Authority Please see attached letter from Arizona Department of Environmental Quality.

9. Releasing Copies of Applications Not applicable: this application does not have confidential, privileged, or sensitive information.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges: Pima County's proposed site is the Roger Road Wastewater Reclamation Facility (RRWRF) in Tucson, Arizona. Pima County Regional Wastewater Reclamation Department (RWRD) decommissioned the RRWRF in 2014. RWRD solicited proposals to reuse the site from the community at large, but none of the respondents possessed the resources needed to do environmental investigations, much less to remediate and clear the site of existing structures. Among the uses proposed in submittals were an aquaculture farm, a photovoltaic array, and fish hatchery. Since then, the 47-acre property has received limited use; yet its location and size make it a prime opportunity for beneficial community uses. An approximately 5-acre corner of the property has been converted into a park with aquatic habitat in the form of two ponds maintained with reclaimed water from the Agua Nueva Wastewater Reclamation Facility (WRF), which is the replacement of the RRWRF. A few warehouses are in use for food storage by the Pima County Animal Care Center. The largest impediment to complete reuse of the property is funding to remediate hazardous building materials and clear existing structures.

In the last year, however, EPA and the Arizona Department of Environmental Quality (ADEQ) have assisted RWRD in completing Phase I & II Environmental Site Assessments (ESA). The ESA investigations confirmed the presence of lead-based paint (LBP) and asbestos containing building materials (ACM) on numerous structures and equipment. Remediation of hazardous building materials is needed to move forward with redevelopment and reuse of the property. Preliminary cost estimates for remediation are more than \$600,000. RWRD has requested assistance from the ADEQ-administered State Response Grant to remediate the LBP and ACM, and ADEQ has committed up to \$250,000 to initiate remediation activities.

Cleanup Grant funds will enable Pima County to accomplish the removal of all hazardous building materials that remain on the property. Remediating the brownfield will safeguard public and environmental health and clear the way to transform a blighted site into a vibrant, community-focused space. In addition to enhancing the quality of life for residents, this grant will serve as a catalyst for job creation, climate resilience and increased property values in the surrounding neighborhoods, contributing to a healthier and more prosperous Tucson for all its residents.

Description of Target Area: The target area consists of Census Tracts 04019004514, 04019004515, 04019001200, 04019001100, and the southern section of 04019004418. The site lies in an unpopulated, industrial section of 04019004418. These tracts correspond to the Santa Cruz River Corridor, a once-perennial waterway and trade route that still connects the people and cultures of southern Arizona and northern Mexico, and is a focus for multiple ecological, cultural, and economic revitalization efforts. Clustered along the Santa Cruz are Tucson's most concentrated populations of Hispanic/Latino and Native American residents and some of our highest-poverty census tracts. Adjacent industrial zones and the I-10 highway, combined with the legacy of discriminatory practices such as redlining, have created barriers to opportunity and attracted substandard housing, including some of the region's highest concentrations of manufactured homes. Now rising temperatures and ebbing rainfall present heat-related health risks and water security concerns, especially for vulnerable populations. The proposed cleanup project will open the way for redevelopment of the site, engaging target-area residents in reuse planning, preserving and restoring riparian open space in a safe, just and equitable manner and expanding recreational and educational opportunities.

ii. Description of the Proposed Brownfield Site: The site at 2600 West Sweetwater Drive in Tucson, Pima County, Arizona, occupies 47 acres in an industrial area (CT 04019004418). It is inactive other than two warehouses being used by the Pima Animal Care Center for pet food storage. Past uses were for agriculture and as a wastewater treatment plant. The site includes extensive unused wastewater treatment infrastructure, pump station buildings, laboratory and administration buildings, and several maintenance, operations, and storage structures. The site is bounded by industrial developments to the north, unoccupied land and Interstate 10 to the east, West Sweetwater Drive and the Sweetwater Wetlands to the south, and the Santa Cruz River to the west.

The Phase II ESA was conducted by Toeroek Associates and Tetra Tech, Inc. in 2022. The study found no soil contamination but confirmed the presence of ACM and LBP in multiple buildings and equipment. The site contains approximately 70 buildings and structures. The ESA documented 11 structures in need of ACM remediation and 10 structures with LBP removal needs.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: Pima County has identified multiple uses for the property. The site on the east bank of the Santa Cruz river is centrally located and is proximate to many natural

and built amenities including the extensive [Santa Cruz River Park](#), an important wildlife corridor, a nationally recognized multi-use path, [The Chuck Huckelberry Loop Bike Path](#); and city-owned [Sweetwater Wetlands Park](#), an approximately 30-acre artificial wetland that is the number one hotspot for birding in the metro area. Downtown Tucson is five miles away. The property is just south of the newest municipal water reclamation facility (WRF) in Pima County, the Agua Nueva WRF, and to a University of Arizona (UA) water and technology research campus, the [Water and Energy Sustainable Technology \(WEST\) Center](#). Moreover, the longest effluent-dependent river section in the State of Arizona begins immediately northwest of the property, making the area of significant interest and investment for the Regional Flood Control District (RFCD). The RFCD is actively implementing a vision for the Santa Cruz River that involved much stakeholder outreach and that culminated in the [Santa Cruz River Management Plan](#), which identified riparian habitat restoration and recreation as community priorities.

Pima County and its partners envision establishing a wildlife park in a portion of the property that would complement the adjacent Santa Cruz River Park and Sweetwater Wetlands, facilitating restoration of riparian habitat and the safe movement of species through the urbanized area. A portion of the property would be allocated for the establishment of a research and development (R&D) center specializing in green and blue technologies, such as water conservation, low-water agriculture, and water/wastewater treatment technologies, complementing the WEST Center and enhancing our region's capacity for innovation and climate resilience. Both proposed uses will have the advantage of leveraging the plentiful supply of high-quality reclaimed water from Agua Nueva.

Alignment with plans and priorities: Decommissioning and redevelopment of the RRWRF is part of Pima County's Regional Optimization Master Plan adopted by the Board of Supervisors in 2007. The Santa Cruz River Corridor is central to Tucson's 4,000-year history and has been a high priority for local government as evidenced by investments to create and support the 137-mile Loop bicycle path, the Mission Gardens, Tucson Origins Park, Santa Cruz Heritage Project and the UNESCO City of Gastronomy. This project is aligned with Pima County RFCD's Santa Cruz River Management Plan developed in 2018-21 to help balance flood risk management, water resources, recreation and education opportunities, and riparian habitat preservation; and is an outgrowth of [A Living River: Charting Wetland Conditions of the Lower Santa Cruz River](#) project. Now in its tenth year, the multi-year annual study was originally funded by an EPA grant to Sonoran Institute and has documented steady improvements in habitat conditions and species populations, including the federally endangered Gila topminnow. Based on persistently high poverty rates and other factors, Pima County has designated the adjacent Flowing Wells Neighborhood as a Community Development Priority Area.

FEMA floodplain mapping shows this as a riparian area outside of the 100-year floodplain. It is protected from ephemeral flows in the Santa Cruz by soil cement bank protection walls installed by Pima County Flood Control. Moreover, the proposed greenspace and water technologies R&D uses are compatible with an area that could see flooding in a 500-year event.

A public RFP was issued in 2014 to solicit ideas for reuse of the RRWRF site. Pima County has consulted with Sonoran Institute (SI), Tucson Audubon Society (TAS), UA College of Agriculture, Life and Environmental Sciences (CALES) and multiple Pima County departments (Economic Development (ED), Community and Workforce Development (CWD), Natural Resources, Parks and Recreation (NRPR), Regional Flood Control District (RFCD)) to assess redevelopment opportunities. In a 2018 survey produced by SI in partnership with RFCD, Pima County residents' highest management priority was "Maximizing wildlife habitat," and their favorite thing about the Santa Cruz River included access to "open space for connecting with nature." At the time of this application, EPA Land Revitalization (LR) program is assisting Pima County in launching a formal best-use analysis study for the RRWRF. The study will analyze market trends as well as community needs to develop recommendations for reuse. RWRD will coordinate with all the above listed partners and departments to solicit input from community members about ideas for reuse of the RRWRF site. As part of this LR process, RWRD will conduct outreach to disadvantaged communities regarding remediation activities and this redevelopment plan, working with social justice CBOs. Pima County CWD will incorporate survey questions about the reuse of RRWRD into this year's upcoming CDBG public community meetings in Flowing Wells neighborhood. RWRD presented this application to the Santa Cruz Watershed Collaborative and wider community on November 1, 2023.

ii. Outcomes and Benefits of Reuse Strategy: The project will result in 25-35 acres of urban greenspace for human recreation and native species conservation, as well as a new water-innovation experimentation site. Redeveloping a blighted site as an attractive, welcoming public amenity will improve the quality of life and property values for adjacent neighborhoods. The proposed R&D center will also contribute to Pima County's status as a global center of excellence in renewable resources and sustainability tech. Establishing a public park is central to reuse plans for the property. In addition to increasing greenspace for nearby residents, the project – adjacent to an important wildlife corridor, the Santa Cruz River, and to the number-one birding hotspot in the

Tucson metro area, the Sweetwater Wetland – will increase available habitat for many species of resident and migratory birds, mammals, reptiles and amphibians. Additionally, the 135-mile multiuse path that follows the river corridor will be enhanced by the removal of the blighted property and expansion of the river park with natural open space. Both the Sweetwater Wetlands and The Loop are important tourism draws for the region and enhancements to this neighboring property will support their contributions to the local economy.

Riparian greenspaces not only offer opportunities for outdoor recreation and education, but also serve as natural cooling centers and mitigate the heat island effects of urban hardscape. On-site stormwater capture/reuse will reduce groundwater use and slow the flow of water during storm events, leading to increased groundwater recharge. Climate resilience will also be increased through creation of a facility to research and develop low-water food production, water-saving technologies, and water treatment process technologies. Associated parking facilities will feature solar-panel shade structures to power electric vehicle charging stations and energy needs for the center, consistent with Pima County's current design standard for all facilities.

No displacement of residents or businesses is expected during cleanup because there are no residences or businesses on, or in the immediate vicinity of, the RRWRF property.

c. Strategy for Leveraging Resources

i. Assessment/characterization: the project leverages significant direct investment by EPA Region 9 (estimated at \$209,000, please see attached email) whereby Phase I and Phase II Environmental Site Assessments (ESA) were completed. The Phase II assessment has been reviewed and finalized by EPA. In the unlikely event of additional assessment needs being identified during the cleanup phase, Pima County will consult with state regulators and would be eligible to reapply for assistance from the State Response Grant.

ii. Remediation: this project leverages \$250,000 from the ADEQ Brownfields State Response Grant that has already been committed. Requested EPA Cleanup Grant funds are expected to cover all remaining costs for remediation; but if unanticipated remediation costs are identified during the project, Pima County will reapply for assistance from the State Response Grant to complete remediation of the site.

iii. Redevelopment will be accomplished solely through non-Brownfields sources. The cost of demolition of structures on the site, once free of hazardous materials, is unknown. RWRD may pursue Pima County Capital Improvement Program, Arizona State Parks/Land and Water Conservation Grants, and/or Arizona Water Conservation Grant Program funding for redevelopment activities. In 2013, Pima County also completed a \$600 million investment in the regional wastewater infrastructure that resulted in the longest section of an effluent dependent river in Arizona being supported with Class A+ effluent water – a tremendous improvement in water quality which brought about improvements in riparian and aquatic habitat quality. RWRD spent \$6.1 million to close the wastewater treatment facility and successfully close out the Aquifer Protection Permit issued by Arizona Department of Environmental Quality. Tucson Audubon Society (TAS) is interested in partnering on a capital campaign to develop a headquarters facility and collaborative conservation campus.

Pima County Regional Flood Control District (RFCD), Watershed Management Group, SI and TAS have committed outreach efforts, volunteers, expertise, and staff consulting time for habitat restoration, invasive species control/eradication and community engagement in the creation of a riparian wildlife park/urban oasis. Pima County RWRD and RFCD jointly fund the aforementioned Living River Report and youth environmental education program. TAS has \$35,000 in community engagement grants. Pima County and TAS have expended \$248,683 on efforts to eradicate invasive, fire-prone plants along the Santa Cruz River, funded in part by US Forest Service and Arizona Department of Forestry and Fire Management. SI and TAS are in the process of applying to US Fish and Wildlife Service for designation of an Urban Wildlife Refuge and Urban Bird Treaty, respectively, both of which could help position the project for additional competitive public and private grant programs. Pima County funds paid work experience for youth and community development projects through its Community and Workforce Development Department. Pima County Flood Control, UA Environmental Sciences, WMG and RWRD will invest an as-yet unknown amount to develop an arid dryland reclaimed water R&D center. Since 2013 Pima County has invested \$1,151,250 in HUD Community Development Block Grant (CDBG) funding to develop green stormwater infrastructure, fire hydrants, shade covers and a family resource center in adjacent Flowing Wells and is currently constructing an overpass to open up access from Flowing Wells to the western bank of the Santa Cruz, a \$30M project funded by federal, state and local highway programs.

iv. Use of Existing Infrastructure: RWRD may consider preservation of laboratory and administration facilities (once cleared of hazardous ACM and LBP) for reuse as part of the new water R&D center or park visitor center. Work performed under this grant will directly activate existing infrastructure which is currently off limits due to the presence of hazardous materials. The proposed site is already served by existing utility services and

roads; minimal infrastructure upgrades would be required to accomplish the envisioned urban parkland and environmental research uses for the site.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. Local community’s need for funding: Tucson/Pima County is among the nation’s poorest large urban metros. (In a comparison of US metro areas with population over one million, Tucson has the 5th highest rate of individuals below poverty per American Community Survey, 2022 1-year estimates.) Despite a population of over one million people, the community has a limited industrial base, preponderance of service-industry dependence and voter reluctance to support infrastructure investment through bond elections or taxation. The median household income in Pima County is 14 percent lower than the national median (United States Census Bureau, 2022). Poverty rates for Pima County subpopulations in 2021 were 17.3% for Hispanic/Latinos, 22.0% for Black/African Americans, 35% for Native Americans, 16.9% for Asian Americans, and 11.3% for White, Non-Hispanic Americans. The target area has a 22% combined poverty rate.

Table 1: American Community Survey retrieved from U.S. Census Bureau

| Percent Below Poverty ACS 2022 1-year estimates | US | Arizona | Pima | Tucson | Target Area |
|---|-------|---------|-------|--------|-------------|
| | 12.6% | 12.5% | 14.4% | 19.2% | 22% |

Notwithstanding promising innovation and cutting-edge tech industry, the community suffers from low educational attainment, low average wages, high crime rates, and low average earnings. These issues are reflected in Environmental Justice Screening Tool indicators for the Santa Cruz River Corridor.

Table 2: Demographic data retrieved from EJScreen.gov, US EPA, 2023

| Indicator | Target Area Rate | State Percentile | National Percentile | Tucson Rate | AZ Rate | US Rate |
|---|------------------|------------------|---------------------|-------------|---------|---------|
| People of Color Population | 65% | 76 | 75 | 57% | 44% | 39% |
| Low Income Population | 60% | 87 | 89 | 43% | 32% | 31% |
| Unemployed | 10% | 80 | 81 | 7% | 6% | 6% |
| Limited English-Speaking Households | 6% | 79 | 78 | 5% | 4% | 5% |
| Population with Less Than High School Education | 22% | 81 | 84 | 14% | 12% | 12% |

Here, a blighted site is fenced off and deteriorating. The envisioned redevelopment of the Roger Road site would activate this place, engage nearby residents, and plug in to the region’s ground-breaking environmental resources and ecological potential. Regional economic development strategies already reflect the importance of nature-based tourism, renewable energy, and climate-resiliency technologies. This project has the potential to engage some of our most marginalized residents in these efforts.

ii. Threats to Sensitive Populations:

1. Health or Welfare of Sensitive Populations - the Phase II ESA elucidated that RRWRF does not currently pose a threat to human populations if the site is unused, secured, and periodically inspected. If left unabated, however, the hazardous materials will degrade and eventually pose a risk. The proposed project will directly impact the health and welfare of sensitive populations by eliminating the potential threat of lead and asbestos exposure from the property. Exposure to lead based paint dust, flakes or groundwater contamination causes permanent brain damage, especially to children. Zip codes 85705 and 85745, which correspond to this project’s target area, were identified as high risk for lead poisoning in the Arizona Department of Health Services 2020 Annual Lead Surveillance Report, which documented rising case rates in Pima County. Statewide case rates showed a disparate share of Hispanic (35.8%) and Native American (10.4%) children relative to share of population. Asbestos is known to cause asbestosis and several forms of cancer.

As a riparian park and water conservation center, moreover, the property would help to mitigate the significant regional threats of heat and drought. Already one of the hottest regions in the country, Tucson is the fifth-fastest warming city in the U.S., according to climatecentral.org and is in its 28th year of long-term drought. There were 38 and 28 heat-related deaths in 2021 and 2022 respectively per Pima County’s Medical Examiner. Summer 2023 broke records for number of consecutive days at 110° or higher and nights above 80°. Heat waves are associated with increased hospital admissions and deaths from cardiovascular, cerebrovascular, kidney, and respiratory disorders, as well as heat stroke. Climate hazards pose a particularly high risk to vulnerable populations. Tucson has a higher prevalence compared to the nation across five indicators of vulnerability: people

of color, people with disabilities, people below the poverty line, people with limited English proficiency, and households with no vehicle. (American Community Survey, cited in Tucson Climate Action Plan, 2023)

2. Greater Than Normal Incidence of Disease and Adverse Health Conditions - Pima County has a Social Vulnerability Index (SVI) of .9118 (Centers for Disease Control and Prevention, 2022). This means only 8% of counties in the U.S. are more vulnerable than Pima County to adverse health conditions. In Pima County, chronic disease remains among the most common, costly and preventable health concerns that magnify long-existing health disparities. Hispanic, African American and Native American populations in the county experience a significantly higher risk of chronic disease due to systemic inequities in the social determinants of health. Notable disparities cited in the Pima County 2021 Community Health Needs Assessment/Pima Health Data Portal include:

- Life expectancy for Native Americans is 69.7 years and 74.7 for African Americans, compared to 78.5 overall and 78.9 for Hispanics.
- Incidence of diabetes in the Medicare population: 19 cases per 100,000 overall, versus 29 for Hispanics, 55 Native Americans.
- Medicare hypertension: 59% overall, 64% of African Americans, 68% Native Americans.
- While 51% of Medicare beneficiaries were vaccinated against flu in 2021, only 36% of Hispanics and 24% of Native Americans were vaccinated.
- Native American and Hispanic communities were disproportionately impacted by the COVID-19 pandemic - Hispanics accounted for 47% of known COVID-19 cases, and Native Americans 4.8%.
- 12% of Pima County’s Medicare beneficiaries were treated for cancer in 2021, which is in the worst 25% of U.S. and Arizona counties.

According to EJSscreen, the target area is at the 75th percentile in the US for low life expectancy, 74th percentile for heart disease, 90th percentile for asthma, and 82nd percentile for persons with disabilities.

3. Environmental Justice (a) Identification of Environmental Justice Issues: the RRWRF site lies just inside census tract 04019004418. This census tract is not disadvantaged per Climate and Environmental Justice Screening Tool but forms a gap in a continuous swath of disadvantaged tracts lining the Santa Cruz River through Tucson. Three disadvantaged tracts are adjacent that roughly align with the Flowing Wells Neighborhood, a Community Development Target Area. This area was the subject of a Washington Post article in 2021 ([Extreme Heat is Killing People in Arizona Mobile Homes](#)); which explicitly linked discriminatory land-use planning, substandard housing, and heat-related illness in Tucson. (b) Advancing Environmental Justice: This project’s community engagement and reuse planning will target Flowing Wells, Silvercrock, El Rio and Barrio Hollywood neighborhoods along the Santa Cruz River. The project will advance environmental justice by redeveloping a blighted and unusable property and opening it up for public recreational and educational uses in an area surrounded by disadvantaged communities. The envisioned uses will return an industrial hardscape to riparian habitat, thus mitigating urban heat island effect and expanding the cool corridor being created along the Santa Cruz with reclaimed water, mitigating climate change impacts.

b. Community Engagement

Table 3. Partner Organizations, Roles and Responsibilities

| i. Name of organization | Point of contact | ii. Specific involvement or assistance |
|--|--|--|
| Pima County Regional Wastewater Reclamation Department | Kimberly Baeza, Lead Hydrologist and Project Manager kimberly.baeza@pima.gov | Coordinate overall community engagement activities, provide regular updates and review input via Regional Wastewater Advisory Committee |
| Arizona Department of Environmental Quality | Travis Barnum, Brownfields Coordinator barnum.travis@azdeq.gov | Provide oversight and funding for cleanup project |
| Pima County Department of Environmental Quality | Scott DiBiase Scott.DiBiase@pima.gov | Provide regulatory oversight for cleanup |
| Sonoran Institute | Luke Cole, lcole@sonoraninstitute.org | Linkages to Living River ongoing study: input on priorities, bilingual community engagement and education, conservation advocacy and public education about Santa Cruz River restoration |

| | | |
|---|---|---|
| Watershed Management Group | Lisa Shipek Lisa@watershedmg.org | Community stakeholder, riparian habitat restoration expertise, volunteer coordination |
| Tucson Audubon Society | Melissa Fratello Mfratello@tucsonaudubon.org Stephanie Kopplin skopplin@tucsonaudubon.org | Coordinates bilingual community engagement, volunteer mobilization, habitat restoration expertise, education, advocacy/input, fundraising partner |
| Santa Cruz Watershed Collaborative | Catlow Shipek, catlow@watershedmg.org Mead Mier, mmier@pagregion.gov | Broader linkages to scientific community, including State and Federal expertise and funding agencies, meeting venue, stakeholder convening |
| Amistades (Latino-led, Latino-serving non-profit committed to race and equity issues) | Claudia Jasso, claudiajasso@amistades.org | Community and youth engagement, social and environmental justice advocacy |
| Flowing Wells Neighborhood Association | Kevin Daily [REDACTED] | Community engagement, input on neighborhood desires, priorities and concerns |
| Pima County Economic Development | Heath Viscovi-chiordi, Heath. viscovi-chiordi@pima.gov | Reuse planning, business community, innovation, and eco-tourism linkages |
| Pima County Natural Resources, Parks and Recreation | Victor Pereira Victor.pereira@pima.gov Robert Padilla Robert.padilla@pima.gov | Design, construction and maintenance of park Interested stakeholder, youth engagement and environmental education programs |
| Pima County Health Department | Andrew Rowe Andrew.rowe@pima.gov Kimberly Van Pelt Kimberly.vanpelt@pima.gov | Public health outreach and education |
| Pima County Flood Control | Jennifer Becker Jennifer.becker@pima.gov | Riparian area expertise, flood safety considerations and design |
| Pima County Community and Workforce Development | Joel Gastellum joel.gastellum@pima.gov | Community development, employee recruitment, training, and social services |
| Tucson Clean & Beautiful youth leadership corps | Angel Breault | Youth employment, training and environmental leadership education |
| University of Arizona Water & Energy Sustainable Technology Center | Ian Pepper ipepper@arizona.edu | Reuse planning, academic community, research and development linkages |

iii. Incorporating Community Input: RWRD will coordinate with the above-listed partners to share updates and solicit input about RRWRF. Committed partner SI delivers youth and family programming—including Spanish-language programming. SI engages underserved communities along the Santa Cruz River corridor, maintaining the Living River outreach report, a digest in English and Spanish of Santa Cruz River conditions for the Tucson area. This annual print media direct-mailing goes to 21,000 households to educate them about the efforts to restore the Santa Cruz River. A bilingual outreach director is part of the SI leadership team. Tucson Clean and Beautiful is currently piloting a Climate Equity Workforce Leadership program exposing youth to climate-related policy issues as well as planning, design and construction skills. Pima County will seek to engage the Tohono O’odham Nation and the Pascua Yaqui tribe. Both native communities hold land along the Santa Cruz River and their history, culture, and impacts are evident in the region. Living River of Words is a youth education and engagement program run by NRPR where children explore, create artwork, and write about the Santa Cruz River. CWD conducts public meetings in Flowing Wells annually to understand community needs and goals. TAS conducts birding classes in English and Spanish at the adjacent Sweetwater Wetlands and removes invasive species up and down the river corridor. The University of Arizona’s Water & Energy Sustainable Technology (WEST) Center is co-located at the Agua Nueva Wastewater Reclamation Facility and specializes in the development of new technologies that deal with water scarcity and reuse. As such, WEST will bring together multiple disciplines across the University to participate in reuse planning for the RRWRF site.

Community engagement has already begun through the EPA’s directly funded Land Revitalization Technical Assistance program, whereby a consultant team has been hired to complete the following components: data review and collection; market review and analysis, including stakeholder interviews; site reuse analysis and conceptual site reuse plan, including an opportunities and constraints with mapping and a limited cost estimate; and site reuse assessment and conceptual site reuse plan workshop. RWRD intends to bring the final reuse plan to the Pima County Board of Supervisors prior to commencement of cleanup activities.

During the Cleanup phase Pima County RWRD and its partners will provide monthly updates at the Regional Wastewater Reclamation Advisory Committee meetings which are publicly noticed and may be attended online or in person. Each update will address questions, concerns or priorities communicated during the previous month’s meeting, both in person and in writing, with Spanish-language versions available. Social media posts will also create a sense of transparency, accountability and collective ownership of the RRWRF cleanup and redevelopment. RWRD’s public meeting regarding this application had 20 attendees.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Based on the Analysis of Brownfield Cleanup Alternatives (ABCA, titled Exhibit G Data Evaluation Report), the most effective method to eliminate the risk at the site is the complete removal and proper offsite disposal of all ACM and LBP. This will eliminate exposure pathways for humans and wildlife to cancer, lead poisoning and other known health risks, and preclude the eventual contamination of air and soil as the ACM and LBP degrade.

Pima County will procure a full-service environmental firm (or team) with the necessary qualifications (AHERA and EPA accredited Project Designer, Arizona-licensed technicians) to complete a site-specific work plan and conduct the safe removal of ACM from 12 structures, and LBP from 11 structures at the site. Trained supervisors and technicians will comply with all federal, state, and local regulations. All appropriate barriers and containment will be used to seal off work areas. HEPA equipment will provide negative pressure throughout the duration of the abatement work. All asbestos and lead base paint will be disposed of in an approved disposal facility and tracked by a waste manifest. OSHA required sampling will be conducted. All required TCLP analyses of lead will be performed and documented.

b. Description of Tasks/Activities and Outputs

Table 4. Tasks and Timelines

| Task 1: Cooperative Agreement Management | |
|--|--|
| i. Project Implementation | Pima County RWRD will oversee the project, coordinate activities and communications, including alignment with ADEQ-funded abatement activities, and prepare and submit progress reports to EPA. RWRD will work with Pima County Procurement in preparing scoping documents and issuing a public, competitive solicitation (consistent with 2 CFR 200 procurement provisions and including Davis Bacon provisions and wages) for an abatement contractor with the proper credentials to develop the project plan, conduct removal of ACM and LBP and monitor adherence to regulatory standards. In accordance with the ABCA, RWRD will work with Pima County Real Property Services to develop and record Institutional Controls to preclude future residential uses of the site. RWRD will complete ACRES reporting, and submission of certified payrolls, and will represent the project/Pima County at any grantee conferences, meetings or site visits. |
| ii. Schedule | Contract executed with Arizona-licensed abatement contractor within 180 days of award, monthly coordination meetings or calls and quarterly progress reporting ongoing through project completion. |
| iii. Task Lead: | Kimberly Baeza, Project Manager, Pima County RWRD |
| iv. Outputs: | Fully executed Cooperative Agreement with EPA, bid/RFP documents and fully executed contract for remediation services, 16 quarterly project progress reports submitted to ACRES, recorded Covenant barring residential use. |
| Task 2: Community Engagement and Reuse Planning | |
| i. Project Implementation | Pima County will hold a pre-project public meeting to inform community residents and other stakeholders about cleanup work to be carried out and will finalize the ABCA and Community Involvement Plan. RWRD will partner with multiple CBOs to maximize awareness and engagement of stakeholders, including low-income and minority families and advocates for ecological restoration and conservation; will compile and maintain a listserv of interested stakeholders; and will share project updates and opportunities to comment via the RWRAC. Reuse planning is currently underway and expected to be completed prior to this award. Community engagement and RWRAC updates will continue to inform stakeholders and the public about the final reuse plan and update progress on cleanup, redevelopment and fundraising activities. |
| ii. Schedule | Pre-project meeting will be held within 210 days of award, quarterly newsletters will be ongoing through project completion. |
| iii. Task Lead: | Kimberly Baeza, Project Manager, Pima County RWRD |
| iv. Outputs: | Community Involvement Plan, final ABCA, meeting notes and attendance, and quarterly newsletters. |

| Task/Activity: Removal of Hazardous Materials | |
|---|--|
| i. Project Implementation | Completion of a detailed abatement plan by contractor (AHERA certified Project Designer) for approval by RWRD, County and State Departments of Environmental Quality. Abatement of all ACM building components at 12 structures by abatement contractor. Removal of all LBP from building components at 11 structures by contractor. Disposal of all ACM and LBP waste at a facility licensed to accept ACM waste and LBP waste. The cleanup will follow the approved plan, isolate the area of remediation with plastic sheets, provide showers and disposable protective suits to prevent contamination of workers. Oversight and monitoring to ensure adherence to plan will be provided by the Project Designer. |
| ii. Schedule | To begin in month eight after award and continuing for twelve months. |
| iii. Task Lead: | Abatement contractor, with oversight and monitoring by RWRD, Arizona and Pima County Departments of Environmental Quality. |
| iv. Outputs: | Submission and approval of abatement work plan. Granting of NESHAP permit. Removal of all ACM and LBP from the site and submission of cleanup completion report. Receipt from a approved landfill that the hazardous materials have been properly disposed of. |

c. Cost Estimates

Personnel: A Project Manager (Kimberly Baeza) is budgeted at 406 hours (.2 FTE for one year) at a current annual salary of \$71,329 for a total of \$14,266.

A second Project Manager/Site Supervisor (Steve Melendez) will be assigned at .1 FTE for one year at current annual salary of \$74,339 for a total of \$7,434.

Non EPA-Funded resources: A Grant Manager and a Grant Accountant will be assigned approximately .1 FTE throughout the duration of the period of performance from Pima County Grant Management and Innovation.

Fringe Benefits: Kimberly Baeza and Steve Melendez’s current actual fringe rates are 30% (\$4,280) and 37% (\$2,751), respectively, of compensation, for a total of \$7,031. Fringe includes Social Security, Medicare, AZ Retirement System, workers compensation insurance, disability, unemployment insurance, HSA, employee assistance program, and life/health/dental insurance.

Travel: Project Manager’s travel to a Brownfields training conference is budgeted at \$1,500, based on \$600 airfare plus lodging cost of \$150 for three days and per diem at the approved rate for the destination city. Staff mileage to conduct outreach and site oversight is budgeted at the approved rate of \$.625 per mile for 20 miles per month.

Supplies: Outreach materials with printing cost will cost \$.20 per page for a total of \$1,000 for 5,000 sheets.

Contractual: Non EPA Brownfields Grant-Funded resources: EPA’s Land Revitalization Technical Assistance Program has contracted with the consultant team of GDIT/Vita Nuova to carry out a Best Use Study at an estimated cost of \$70,000.

Construction: EPA Brownfields Cleanup funding is requested for contracted construction costs to remediate contamination at the RRWRF site. Costs are budgeted based on the costs estimated for the ABCA by the Toeroek Team in early 2023, plus inflation projected at 10% based on comparable recent experience in our market, Development of abatement work plan is budgeted at \$45,000.

ACM abatement budgeted at \$554,500.

LBP removal is budgeted at \$95,700 for 1,700LF and 2,882SF of paint.

Offsite disposal is budgeted at \$5,500.

Our request is adjusted based on ADEQ’s commitment of \$250,000 towards this overall cost for a total request for construction of 450,700.

Other: \$10,000 is budgeted for implementing a restrictive covenant to prevent future residential use of the property. Advertising costs are projected at \$600 for legal notices (3 @ \$200 each).

There are no subawards or participant support costs anticipated.

Indirect costs: Pima County voluntarily elects to forgo indirect costs, based on a waiver issued by the County Administrator.

| | | Project Tasks (\$) | | | Totals |
|--------------|------------------------|--------------------|----------|----------|----------|
| | | (Task 1) | (Task 2) | (Task 3) | |
| Direct Costs | Personnel | \$7,133 | \$7,133 | \$7,434 | \$21,700 |
| | Fringe Benefits | \$2,140 | \$2,140 | \$2,751 | \$7,031 |
| | Travel ¹ | \$1,500 | \$75 | \$75 | \$1,650 |
| | Equipment ² | | | | 0 |

| | | | | | |
|--|------------------------------|----------|----------|-----------|----------------------------|
| | Supplies | | \$1,000 | | \$1,000 |
| | Contractual | | | | (see “construction” below) |
| | Construction ³ | | | \$450,700 | \$450,700 |
| | Other (advertising, permits) | \$10,000 | \$600 | | \$10,600 |
| Total Direct Costs ⁴ | | | | | |
| Indirect Costs ⁴ | | | | | |
| Total Budget (Total Direct Costs + Indirect Costs) | | \$20,773 | \$10,948 | \$460,960 | \$492,681 |

d. Plan to Measure and Evaluate Environmental Progress and Results

Pima County RWRD will track progress through monthly meetings comparing planned to actual project milestones, budget to actual expenditures, monthly contractor reports and monitoring visits. Pima County will use grant management tools provided by Amplifund software. The environmental result of the project is expected to be the RRWRF being free of hazardous materials, contributing to a cleaner environment along the Santa Cruz River Corridor, as evidenced by the contract deliverable of a final cleanup report for the site. Pima County has an interest in the redevelopment of the property to meet strategic conservation and climate resiliency goals and will measure long-term results during and after the period resulting from adaptive reuse planning and subsequent redevelopment efforts and investments that we hope to unlock through accomplishment of the proposed Brownfields Cleanup activities. Progress, outputs and outcomes will be documented in ACRES quarterly reports.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational structure – RWRD will lead the implementation of the grant, with the assistance of Pima County’s Procurement and Grants Management and Innovation (GMI) Departments. RWRD oversees a regional wastewater system serving 275,000 customers; manages a budget of \$180 million and a workforce of 400 FTEs and treats 62 million gallons of sanitary sewage per day. RWRD possesses extensive technical expertise and experience with project management, regulatory compliance, contractor oversight and community relations. In 2014 under the Regional Optimization Master Plan RWRD accomplished the regulatory-driven upgrade and expansion of the regional wastewater treatment system \$114 million under budget and a year ahead of the deadline.

The GMI Finance Division reviews and processes all grant financial transactions including accounting entries, cash flow reporting, and expense monitoring, reimbursement requests, fiscal records and audit assistance. The Division coordinates the County’s annual Single Audit process with the Arizona Auditor General. Pima County government reported a total of \$134 million in federal awards and subawards in Fiscal Year 2022 and was determined a low-risk auditee. Pima County uses the CGI Advantage systems to track and manage all financial and budget activities and is currently implementing Amplifund grant management software.

The Project Team will be lead by the Project Manager and will include a Project Manager/Site Supervisor, the Abatement Contractor, the GMI Grant Manager and Finance Principal, and the Procurement Buyer. The Project Manager will report to the RWRD Director and Deputy Director. The Site Supervisor, Steve Melendez, has over 30 years of experience in Pima County public works and capital improvement project management. A GMI Grant Manager will provide grant management support and a Finance Principal supported by a Grant Compliance Specialist will track all expenditures, review allowability, perform monthly reconciliations, prepare budget-to-actual reports and submit reimbursement requests. The GMI Finance team is overseen by Dr. Shanika Serial, Finance Executive with an MBA and 23 years of experience in government grant administration and finance. Community input and engagement efforts will be supported by the professional public information team at Pima County’s Communications Office, which includes media relations, graphic design, social media and printing capabilities.

iii. Pima County Procurement Department (PCPD) manages millions of dollars in procurements annually and oversees compliance with the Arizona state procurement statutes, 2 CFR 200.318-200.327, the County’s Procurement Code, and numerous federal directives, including Fair Share Goals, Build America/Buy America, and Non-Debarment and Suspension verification. PCPD maintains detailed written Procurement Policies, including policies specifically for procurements conducted under federal grants. PCPD has won the National Procurement Institute’s Achievement of Excellence Award 19 years in a row. Pima County understands that when

a contractor is procured for this project, we will be required to comply with applicable federal procurement requirements.

RWRD takes a grow-our-own approach to workforce development, sponsoring apprenticeships for treatment operators and academies for high school and college students and has strong partnerships with Pima Community College and University of Arizona. Pima County is well-positioned to promote local hiring and strong labor practices due to its role operating the regional public American Job Center system. While hazardous substance removal is restricted to qualified individuals and firms, other aspects of the subsequent redevelopment efforts will be linked to employment and training programs operated by Pima County Community and Workforce Development and Tucson Clean and Beautiful to facilitate recruitment of training program graduates, disadvantaged youth and residents of the Santa Cruz River Corridor neighborhoods and tribal communities.

b. Past Performance and Accomplishments

i. Pima County has previously received a Community-Wide Brownfields Assessment Grant through its Community and Workforce Development Department, focused on the Benson Highway Corridor on Tucson's extremely distressed southeast side.

(1) Accomplishments: Under the 2015 Community-Wide Brownfields Assessment a total of 14 sites and 22.87 acres were assessed for environmental contaminants. A total of 14 Phase I ESAs [seven (7) Hazardous Materials and seven (7) Petroleum], one (1) Phase II ESA, one (1) comprehensive Asbestos Survey for demolition, and one (1) Lead-Based Paint (LBP) Inspection were completed. All required reports were filed on a quarterly basis and pertinent property profiles were completed and updated in the ACRES database. One of the sites was ultimately redeveloped and still operational as a boutique hotel featuring vintage trailers, 50's-era décor, local art and live music performances.

(2) Compliance with Grant Requirements: The 2015 Community-Wide Brownfield Assessment Grant remained in full compliance with the workplan submitted to EPA, as well as the required terms and conditions of the agreement. All quarterly reports were submitted on a timely basis and all required ACRES reporting has been completed. Pima County experienced complications and delays with the initial process of procuring qualified environmental services and requested and received approval to extend the grant period through 9/30/2021.

Approximately \$75,000 remained in the grant upon closeout. Due to the COVID-19 pandemic, most of the program activity halted during the extension period. Outreach was extremely difficult, and a statewide shutdown led to the closure of many businesses deemed "non-essential", including environmental consultants. As a result, this led to delays in scheduled assessment activities, as contractors and some prospective participants were forced to focus their attention elsewhere. Additionally, the increased timeline for Phase I and Phase II ESA review by EPA led to some prospective program participants seeking the assessment services via other funding sources.

(3) Pima County administers approximately \$650,000 per year in EPA grants under the Clean Air Act. One of our recently completed EPA assistance awards was the Clean Air Act Section 103 Near Road Clean Air Monitoring Grant. The purpose of this grant was to site and construct a Nitrogen Dioxide (NO₂) monitoring station. EPA's goal was to capture short-term NO₂ concentrations near heavily trafficked roads, to assess area-wide (or community-wide) NO₂ concentrations, and to assess NO₂ concentrations for vulnerable and susceptible populations. Notwithstanding a one-year delay due to circumstances during the pandemic, Pima County Department of Environmental Quality selected a site on Grant Road and successfully completed siting, design, procurement and construction of the NO₂ monitoring station in compliance with all requirements under an approved no-cost extension. Final reports were submitted within 90 days of the end date with 96% of funds expended.

In 2020 Pima County closed out a \$5 million Transportation Investments Generating Economic Recovery (TIGER) grant from the US Department of Transportation. The purpose of this grant was to construct a rail spur to serve the Port of Tucson to increase the region's competitiveness as a transportation and logistics hub, as demonstrated by reduced time impacts of the intermodal facility on the Union Pacific Railroad main line and increased lifts the Port. Pima County oversaw the grant implementation, procurement, construction, and fiscal administration on behalf of the Port of Tucson. The grant and committed non-federal cash match were fully expended and a new rail siding and switching system were completed. The final report submission documented a 58% decrease in time impacts to the UP line and a 258% increase in total container lifts, while the Port reported a tenfold increase in the number of containers it can accommodate.

Pima County Roger Road Brownfields Cleanup Grant Application Threshold Criteria

1. Statement of applicant eligibility

Pima County is a local county government in Arizona. Pima County is not a 501(c)(4) corporation.

2. Information on previously awarded Cleanup Grants

Pima County has not previously received a Brownfields Cleanup Grant.

A Community Wide Assessment Grant was awarded in 2015 to Pima County Community Development and Neighborhood Conservation Department and closed out in November 2022.

3. Open Multipurpose Grants

Pima County does not have an open Multipurpose Grant.

4. Site Ownership Information

Pima County is the sole owner of the proposed property. Pima County acquired the property from the City of Tucson in 1979 under a deed recorded on July 2, 1979, in Book 6061, page 922. In November 1977, the City of Tucson voters approved the transfer of the Site to Pima County in a special election.

5. Basic Site Information

- a) The name of the site is the Roger Road Wastewater Reclamation Facility.
- b) The site is located at 2600 West Sweetwater Drive, Tucson, Arizona 85705.

6. Status and History of Contamination at the Site

- a) **Hazardous Substances:** Asbestos Containing Materials (ACM) has been detected in the Administration Main and South Buildings, Blower Building, Control House #1, Custodian Trailer, Daft Building, Digesters, Field Lab, two Gravity Thickeners, Maintenance Building, Maintenance Warehouse, Sludge-Drying Beds Transite Pipe, and Weld Shop. Lead Based Paint (LBP) has been confirmed in the Main Administration Building, Generator Building, Daft Building, Weld Shop, one Pump Station Building, two Control Houses and one Digester.
- b) **Operational History:** The 47-acre property is a former wastewater treatment plant that was decommissioned in 2014. Before development as a wastewater treatment facility, the Site was used for agricultural purposes. The Site was developed in the early 1950s and is located adjacent to commercial and industrial developments. The City of Tucson was the previous owner of the Site. In a November 1977 special election, the City of Tucson voters approved the transfer of the Site to Pima County. Pima County acquired the property from the City of Tucson in 1979. The Site was used for wastewater treatment activities for over 50 years and permitted to treat 41 million gallons per day average monthly flow until it ceased operations in 2014. Since that time, it has been closed with

minimal use. The site contains 45 structures associated with wastewater treatment processing.

- c) **Environmental Concerns:** The Phase II environmental site assessment (ESA) identified the following recognized environmental conditions (RECs) (Toeroek Associates, Inc. and Tetra Tech, Inc. 2022):
Asbestos-Containing Material (ACM) and Lead-Based Paint (LBP): The hazardous building material survey documented the presence of ACM and LBP in building materials in structures at the site, including a transite pipeline that is located at the Sludge Drying Bed area.
- d) The facility was constructed in the early 1950s using standard commercial building materials and standards which were not known at that time to be hazardous to human health. The contamination consists of lead-based paint and asbestos used in several buildings and pieces of equipment. The Phase II assessment has confirmed that there is no soil contamination.

7. Brownfield Site Definition

The site is: a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Applications

The U.S. Environmental Protection Agency (EPA) Region 9 contracted with Toeroek Associates, Inc., and its subcontractor, Tetra Tech, Inc., (hereinafter, the Toeroek Team) to conduct a Phase I and Phase II Environmental Site Assessment (ESA) of the Roger Road Wastewater Reclamation Facility site in 2022-2023. The final ESA is dated March 8, 2023. During the Phase II ESA, soil and soil gas samples were collected and tested. In addition, the Toeroek Team collected samples of suspected ACM and verified quantities of confirmed ACM. LBP was identified and quantified by the Toeroek Team. The hazardous building materials survey documented the presence of ACM and LBP in building materials at interior and exterior building components, as well as an exterior ACM transite pipe.

In 2013, Pima County and its contractor, EnviroIntegration Services, LLC, conducted extensive soil investigations throughout the facility as part of the clean closure requirements of the Aquifer Protection Permit (APP) issued to Pima County Regional Wastewater Reclamation Department (EnviroIntegration Services, LLC 2014) by the Arizona Department of Environmental Quality. Soil samples were collected from soil borings at the sludge drying beds area and analyzed for total metals, volatile organic compounds, semivolatile organic compounds, and nitrogen compounds. APP-exempt tanks were inspected to verify that the tanks remained exempt from APP regulation at the time of decommissioning. These investigations were required in order for Arizona Department of Environmental Quality to issue a Permit Release Notice per Arizona Administrative Code R18-9-A209.

9. Site Characterization

Please see attached letter (Attachment A) from Arizona Department of Environmental Quality affirming that the Roger Road Wastewater Reclamation Facility site is eligible to be enrolled, and is in fact enrolled, in the state voluntary response program and that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site(s).

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Roger Road Wastewater Reclamation Facility site.

11. Sites Requiring a Property-Specific Determination

No property-specific determination is required. The Roger Road Wastewater Reclamation Facility is not:

- Listed or proposed to be listed as a property subject to CERCLA.
- Subject to administrative or judicial orders of consent decrees issued by the US or Arizona under RCRA, FWPCA, TSCA or SDWA.
- Subject to RCRA corrective actions.
- Subject to RCRA closure or to closure requirements specified in a closure plan or permit.
- Subject to PCBs that are subject to TSCA remediation; or
- Receiving clean up funding from the LUST program.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites:

Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

Per CERCLA § 104(k)(3)(E), if an applicant that is a public entity (such as a state or local government) acquired property prior to January 11, 2002, the applicant is eligible for a Brownfields Grant and may use grant funds to address contamination at the property, even if the entity does not qualify as a bona fide prospective purchaser, provided the applicant did not cause or contribute to the release or threatened release of a hazardous substance at the property.

Provide the following information to demonstrate that the applicant qualifies for the exception at CERCLA § 104(k)(3)(E):

- (a) Pima County's acquisition of the property dates to the period when the dissolution of a Metropolitan Utilities Management Agency (MUM) resulted in the City-County Sewer Intergovernmental Agreement of 1979. A multi-year comprehensive analysis culminated in a June 9, 1978, report to the City of Tucson Mayor and Council and the Pima County Board of Supervisors recommending that the metropolitan sanitary system be consolidated under County management. The selection of County over City was favored due in part to the broader tax base of the County providing greater financial flexibility

and strength for the long-range capital needs of the sewer system. This was substantiated by a November 1977 special election in which qualified electors of the City voted in favor of authorizing the City to transfer its sanitary system to the County.

- (b) The property was acquired on July 2, 1979.
- (c) No disposal of hazardous substances occurred at this site before or after Pima County's acquisition of the property.
- (d) Pima County has not caused or contributed to any release of hazardous substances at the site.
- (e) Pima County has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

13. Cleanup Authority and Oversight Structure

- a) Pima County Regional Wastewater Reclamation Department will be responsible for implementing the proposed cleanup project to remove ACM and LBP from the entire Roger Road Wastewater Reclamation Facility site. Pima County is already enrolled in the Arizona Department of Environmental Quality's Brownfields voluntary response program. Pima County Procurement Department will conduct a competitive, public Request for Proposals to select a qualified contractor to remove ACM and LBP. The process will conform to the competitive procurement provisions of 2 CFR §§ 200.317 through 200.327 and will ensure that the qualified service provider(s) is under contract prior to the commencement of cleanup activities.
- b) Pima County will not need access to adjacent properties to accomplish the proposed cleanup activities.

14. Community Notification

Pima County published a legal notice (Attachment B) in the Arizona Daily Star which ran on October 30, 2023, announcing the following:

- That a copy of the grant application, including the draft ABCA(s), was available for public review and comment both online and in person at the Agua Nueva Water Campus public lobby.
- Weblink and physical address where the draft application was made available.
- Instructions on who to contact to comment on the draft application.
- That a hybrid in-person/virtual public meeting was scheduled to be held on November 1st on Microsoft Teams and at the Agua Nueva Water Campus Community Room at 3:30 p.m.

The notice was also placed on Pima County's website (Attachment C).

- At the meeting the Project Manager, Kimberly Baeza, presented the proposed cleanup, draft application, and draft Analysis of Brownfield Cleanup Alternatives (Attachment D) and solicited public review and comments. The meeting was recorded, and attendance, comments and responses were documented.
- Please refer to the following:

- Public meeting attendance and meeting summary (Attachment E)
- Comments received (Attachment F)

15. Contractors and Named Subrecipients

Pima County has not procured contractor(s) to perform services pursuant to this application. If Pima County's proposed Brownfields Cleanup Grant application is selected for funding, then Pima County Procurement Department will conduct a competitive, public Request for Proposals to select a qualified contractor to remove ACM and LBP. The process will conform to the applicable provisions of Pima County's Procurement Code and the competitive procurement provisions of 2 CFR §§ 200.317 through 200.327. Price will account for at least 40% of the scoring of RFP responses. Pima County will ensure that the qualified service provider(s) is under contract prior to the commencement of cleanup activities.

Pima County does not have any named subrecipients in this application.



Katie Hobbs
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Karen Peters
Cabinet Executive Officer
Executive Deputy Director

November 1, 2023

Jackson Jenkins
Director
Pima County Regional Wastewater Reclamation Department
201 North Stone Avenue
Tucson, AZ 85701

Re: Support Letter for Pima County – Former Rogers Road - Wastewater Treatment Plant -
Brownfields Cleanup Grant

Dear Mr. Jenkins,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter of support for Pima County's Brownfields Cleanup Grant Fiscal Year 24 (FY24) application to the U.S. Environmental Protection Agency (EPA).

ADEQ believes that the FY24 Brownfields Cleanup Grant will support the Brownfields assessment work already performed at the site in 2022. A substantial level of characterization was completed allowing Pima County to identify the cleanup efforts needed and justification to apply for \$500,000 for the FY24 grant cycle. The grant will address the hazardous substances at the site located at 2600 West Sweetwater Drive, Tucson, Arizona. ADEQ will be providing funding under the State Response Grant to assist with the cleanup in addition to this grant.

The site is eligible to enroll into ADEQ's Voluntary Response Program to affirm the site has been fully characterized and cleaned up to regulatory cleanup levels in order to obtain a No Further Action Letter for the site. Pima County will enroll into the VRP once the grant is awarded.

This grant will allow Pima County to continue to support environmental justice, climate adaptation and resilience, high-quality jobs, strong labor practices, and equitable workforce pathways, which are EPA priorities for this grant cycle.

Sincerely,

Travis Barnum

Travis Barnum, Brownfields Coordinator
Waste Program Division

Phoenix Office

1110 W. Washington St. | Phoenix, AZ 85007
602-771-2300

Southern Regional Office

400 W. Congress St. | Suite 433 | Tucson, AZ 85701
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