



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

Via Email

July 17, 2019
VRP 20-013

Mr. Joseph Zidron
Real Estate and Environmental Branch Chief
Border Patrol & Air and Marine PMO
U.S. Customs and Border Protection
24000 Avila Road, Suite 5020
Laguna Niguel, California 92677

RE: Review of Final Remedial Action Work Plan
U.S. Border Patrol Former Pistol Range
Target Range Road
Nogales, Arizona
Site Code: 511695-00

Dear Mr. Zidron:

The Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) has completed its review of the documents titled *Final Remedial Action Work Plan* (the Work Plan) prepared by Sol Solutions, LLC and J.C. Palomar, Inc. on behalf of the U.S. Customs and Border Protection and dated April 2019. The Work Plan does not require any additional revisions at this time so long as the following conditions are met:

- The VRP requires all sidewall confirmation soil samples be submitted for laboratory analysis. Laboratory analytical data shall be compared to the residential Soil Remediation Levels (SRLs) in Arizona Administrative Code R-18-7-201 et seq. and ADEQ Groundwater Protection Levels to determine whether additional excavation is necessary. The most conservative standard should be used. XRF data cannot be used as confirmation in support of a No Further Action determination.
- The SRLs for Polynuclear Aromatic Hydrocarbons presented in Section 3.1 are the 1×10^{-6} excess lifetime cancer risk standards. This standard is used when the current or currently intended future use of the contaminated site is a child care facility or school where children below the age of 18 are reasonably expected to be in frequent, repeated contact with the soil. Since this criteria does not apply to the site, the 1×10^{-5} excess lifetime cancer risk standards may be used. The SRLs can be found at: https://apps.azsos.gov/public_services/Title_18/18-07.pdf
- As the volunteer, the U.S. Customs and Border Protection is responsible for obtaining and complying with any and all applicable permits.

Work Plan approval is pending a 30 day public comment period in accordance with Arizona Revised Statutes § 49-176.

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The VRP will prepare a public notice to be published on the ADEQ webpage. **This notice shall also be provided to the property owner(s) by the U.S. Customs and Border Protection.** The 30 day public comment period will begin the date the notice is published on the webpage. If any public comments are received, they must be addressed prior to Work Plan approval.

Please contact me at 602-771-4847 or toll-free at 1-800-234-5677 if you have any questions. ADEQ appreciates your efforts at this site.

Sincerely,

A handwritten signature in black ink, appearing to read "Nichole Osuch". The signature is fluid and cursive, with the first name being more prominent than the last.

Nichole Osuch
Project Manager
Voluntary Remediation Program