



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

Via Email

November 8, 2019
VRP 20-066

Mr. Joseph Zidron
Real Estate and Environmental Branch Chief
United States Customs and Border Protection
24000 Avila Road, Suite 5020
Laguna Niguel, California

Re: Voluntary Remediation Program Work Plan and Addendum
Properties Adjacent to U.S. Border Patrol Former Pistol Range
Parcels 113-49-002C, 113-49-002D, 113-49-006A, and 113-49-006B
Nogales, Arizona
VRP Site Code: 513182-00

Dear Mr. Zidron:

The Arizona Department of Environmental Quality (ADEQ), Voluntary Remediation Program (VRP) has reviewed the document titled *Addendum to Voluntary Remediation Program Work Plan* (the Addendum) dated October 15, 2019 and prepared by e6 Services on behalf of the U.S. Customs and Border Protection (USCBP). The Addendum addresses VRP comments sent October 4, 2019 regarding the *Voluntary Remediation Program Work Plan* and *Requested Revisions to Work Plan*. The Addendum successfully addresses all the VRP's substantial comments and no further revisions are necessary at this time. Work Plan approval is pending a 30 day public comment period in accordance with Arizona Revised Statutes § 49-176.

In regards to VRP comments #3, 5, and 6 and associated USCBP Responses, please note the Universal Treatment Standard for lead of 0.75 milligrams per liter in 40 C.F.R. § 268.40 is the applicable standard for treatment of hazardous waste. The *Voluntary Remediation Program Work Plan* dated July 10, 2019, did not specify a standard to which soil would be treated. The Addendum adequately explains the Alternative Land Disposal Restrictions will be used at the site as allowed by 40 C.F.R. § 268.49, thus the comment being satisfying VRP comment(s) on this issue.

The following information must be added to the community involvement language for the on-site sign to be posted during on-site field activities: duration of field activities and contact information for either you or your authorized agent.

On November 5, 2019, e6 Services sent an email to the VRP stating field work will begin prior to the work plan's public comment period required by Arizona Revised Statutes § 49-176. Please be aware that any public comments received by the VRP must be considered and satisfied by the USCBP, which could include adjustments to completed field activities. Also, as the volunteer, the USCBP is responsible for obtaining and complying with any and all applicable permits for the work proposed.

Main Office

1110 West Washington Street • Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

www.azdeq.gov

printed on recycled paper

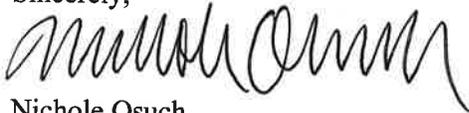
How to Respond

No response to this letter is required at this time.

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 USCBP. The 30 day public comment period will begin the date the notice is published on the webpage.

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 a large initial "N" and "O".

Nichole Osuch
Project Manager
Voluntary Remediation Program

cc: Tod Whitwer, e6 Services – via email