



**U.S. Customs and  
Border Protection**

OCT 15 2019

Ms. Nichole Osuch, PMP  
Arizona Department of Environmental Quality  
Voluntary Remediation Program  
1110 W. Washington Street  
Phoenix, Arizona 85007

**Reference:** Work Plan Comment Responses - VRP Site Code: 513182-00

Dear Ms. Osuch:

Customs and Border Protection (CBP) received your e-mail from the Arizona Department of Environmental Quality (ADEQ), Voluntary Remediation Program (VRP) dated October 4, 2019 that provides comments to US CBP following VRP's review of the documents titled *Voluntary Remediation Program Work Plan* (the Work Plan) dated July 10, 2019, and *Requested Revisions to Work Plan* (the Revisions Email) dated September 20, 2019, both prepared by GeoTek Contracting and Remediation, LLC on behalf of CBP. The documents were prepared for Properties Adjacent to U.S. Border Patrol Former Pistol Range (Parcels 113-49-002C, 113-49-002D, 113-49-006A, and 113-49-006B) in Nogales, Arizona with the assigned VRP Site Code: 513182-00.

As requested, CBP is providing the enclosed responses to VRP's comments as an Addendum to the Work Plan. Please note that textual revisions to the Work Plan are indicated as italicized font in this response summary letter. We appreciate VRP's review of the Work Plan and trust that our responses adequately address VRP's comments. Should you have any questions, please contact US CBP at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Joseph Zidron".

Joseph Zidron  
Real Estate and Environmental Branch Chief  
Border Patrol & Air and Marine PMO  
U.S. Customs and Border Protection

Enclosure

ADDENDUM TO VRP WORK PLAN  
U.S. CUSTOMS AND BORDER PROTECTION  
PROPERTIES ADJACENT TO FORMER US CBP SMALL ARMS FIRING RANGE AZ0047  
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The following revisions are made to the Voluntary Remediation Program Work Plan (VRP Work Plan) dated July 10, 2019 that was prepared by GeoTek Contracting and Remediation, LLC and sealed by Tod Whitwer, PE. Textual revisions to the Work Plan are indicated by italicized in this Addendum to the VRP Work Plan.

**ADEQ Comment No. WP-1:**

The Work Plan states a No Further Action (NFA) determination for groundwater will be sought for the site. The VRP is unable to issue NFAs for groundwater without groundwater data. However, based on the estimated depth of contaminated soil requiring remediation (no greater than 5 feet below ground surface (bgs)) and the inferred depth to groundwater of greater than 150 feet below ground surface (based on attempted groundwater monitoring well installation where groundwater was not encountered at a depth of 150 feet bgs), an investigation of groundwater will not be required by the VRP at this time.

**CBP Response:**

Comment noted. US CBP will not seek a NFA determination for groundwater.

**ADEQ Comment No. WP-2:**

Section 5.3 does not contain enough information on the soil stabilization process, including but not limited to, how ECOBOND will be applied, where it will be applied, and how much will be applied.

**US CBP Response:**

The text of Section 5.3 is replaced with the following revised text:

*As discussed in Section 3.1.9 of the VRP Work Plan, GeoTek initially performed a stabilization study using Portland cement. Based on the results of the initial stabilization study, Portland cement did not consistently stabilize the soil to below the hazardous waste level for the toxicity characteristic of 5 mg/L. Therefore, GeoTek researched alternative stabilization methods for the Site soil. Based on GeoTek's research, GeoTek selected the possible use of ECOBOND® to stabilize the Site soil. Therefore, GeoTek submitted two of the stabilization-study samples to MT2 to perform a stabilization study of Site soils. MT2 requested one sample be submitted with a relatively high concentration of total lead (Sample No. SS-2) and one sample with a relatively low concentration of total lead (Sample No. SS-1). GeoTek screened the samples with a ¼-inch sieve to remove bullets, bullet fragments, rocks, and vegetation, and submitted the soil samples to MT2 to perform the stabilization study using the propriety ECOBOND® mixture. The analytical results of the stabilization study performed using ECOBOND® demonstrated that a 5% ECOBOND®/soil mixture stabilized the soil such that the lead concentration in the TCLP extract did not exceed the hazardous waste characteristic of 5 mg/L. Therefore, soil suspected or known to exhibit the hazardous waste toxicity characteristic for lead will be treated using the ECOBOND® additive, a phosphate-based stabilizing agent that chemically bonds with lead and other metals when mixed with the soil to form insoluble salts. Bulk ECOBOND® reagent will be delivered by truck to the Site and stored within the Soil Processing Area in stockpiles.*

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*Soil requiring stabilization using the ECOBOND® additive will be transported from the screening plant area to the stabilization area (both areas are within the Soil Processing Area) via a loader equipped with a bucket scale. The approximately 100-ton unstabilized soil stockpiles will be wetted to reduce dust generation and to expedite the reagent/lead reaction process. Approximately 5 tons of ECOBOND® additive, a granular solid, will be applied to the surface of the soil stockpile using a broadcast sprayer or front-end loader. An excavator will thoroughly mix the soil and ECOBOND® additive as it is added to the soil stockpile. Additional water will be applied to the stockpile during the mixing process. Stabilized soil stockpiles will be assessed in accordance with the procedures outlined in Section 5.4 of the Work Plan to verify the stabilized soil meets applicable hazardous waste standards.*

*As discussed in Table 2.2 of the Sampling and Analysis Plan (SAP), an estimated 11,778 cubic yards (approximately 17,667 tons) of material will be stabilized. Therefore, approximately 883 tons of ECOBOND® will be added to soils. If the analytical results from the Stabilized Stockpile Material demonstrate that concentrations of these parameters are less than the hazardous waste characteristic concentrations for lead and arsenic, then it will be assumed that the soil in the stockpile is a non-hazardous waste and the material can be disposed off-site as a non-hazardous waste. If any single analyte exceeds its hazardous waste characteristic concentration, the material will be further stabilized using the ECOBOND® additive and re-sampled for TCLP testing. If the material cannot be stabilized such that the hazardous waste characteristic concentrations are exceeded, the soil will be disposed off-site as a hazardous waste.*

**ADEQ Comment No. WP-3:**

In Section 5.3, it is unclear if soil will be sampled and analyzed for TCLP after stabilizing with ECOBOND® to ensure it meets the lead Universal Treatment Standard (UTS) of 0.75 milligrams per liter to comply with 40 C.F.R. § 268.40.

**US CBP Response:**

See the response to ADEQ Comment No. WP-4 regarding sampling and analysis of soil treated with ECOBOND® to verify it meets applicable treatment standards.

US CBP does not agree that the appropriate treatment standard for the contaminated soil is the lead UTS of 0.75 mg/L as analyzed by Toxicity Characteristic Leachate Procedure (TCLP). The following text is added following the first paragraph of Section 4.3.5 to clarify appropriate LDR treatment standards for contaminated soil to be disposed off-site:

*In addition to movement of contaminated soil within the Area of Contamination (AOC), land disposal restrictions apply to soil to be transported and disposed off-site. On May 26, 1998, EPA promulgated land disposal restriction treatment standards specific to contaminated soils (see 63 FR 28555 and 40 CFR 268.49), one of the purposes of which was to encourage more cost-effective cleanup of hazardous contaminated soil (see EPA's "Guidance on Demonstrating Compliance With the Land Disposal Restrictions (LDR) Alternative Soil*

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*Treatment Standards, Final Guidance (EPA530-R-02-003)” dated July 2002. As found in Title 18, Chapter 8, Section 268 of the Arizona Administrative Code (R18-8-286), ADEQ incorporated the portions of 40 CFR 268 that are applicable to this site. Therefore, the Alternative LDR treatment standards are applicable to stabilized contaminated soil generated at this site and disposed off-site.*

*The applicable Alternative LDR treatment regulations are found at 40 CFR 269.49(c) and state that prior to land disposal, contaminated soil subject to LDRs must be treated according to the UTS specified in 40 CFR 268.48 or as follows:*

- *Treatment must achieve 90 percent reduction in constituent concentrations as measured in leachate from the treated media (tested according to the TCLP); or*
- *Treatment to achieve constituent concentrations less than 10 times the UTS identified in 40 CFR 268.48 Table UTS.*

*The UTS for lead is 0.75 mg/L as analyzed by TCLP, and ten times the UTS is 7.5 mg/L. The hazardous waste characteristic level is 5.0 mg/L, which is less than 10 times the lead UTS of 7.5 mg/L. Therefore, the hazardous waste characteristic level of 5.0 mg/L will be used as the applicable treatment standard (rather than the UTS or Alternative LDR treatment standard), and only stabilized soil containing lead in a concentration less than 5.0 mg/L as analyzed by TCLP will be transported and disposed off-site as a non-hazardous waste.*

*The UTS for arsenic and the hazardous waste characteristic level for arsenic are both 5.0 mg/L as analyzed by TCLP. Therefore, only stabilized soil containing arsenic in a concentration less than 5.0 mg/L as analyzed by TCLP will be transported and disposed off-site as a non-hazardous waste.*

In addition, the text of Section 2.2.2 of the SAP is revised as follows:

*The soil in the tray will be divided into 50 sections and a small spatula will be used to fill a 4-ounce (4-oz) clear glass jar for TCLP analysis of lead and arsenic using EPA Methods 6010/1311. ~~The samples will be placed in a 2-ounce (oz) clear glass jar.~~*

**ADEQ Comment No. WP-4:**

Section 5.4 states that waste characterization samples will be collected and analyzed as described in Section 5.1.3 of the Sampling and Analysis Plan (SAP) in Appendix A, however Section 5.1.3 does not exist in the SAP.

**US CBP Response:**

The existing text of Section 5.4 is removed and replaced as follows:

*Stabilized soil will be characterized based on the procedures outlined in Section 2.2.2 of the SAP to ensure that stabilized soil is not classified as a hazardous waste prior to removal from the area of contamination. Non-hazardous, stabilized soil will first be transported from*

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*the Soil Processing Area to the Non-Hazardous Soil Temporary Stockpile Area as described in Section 5.5 of the Work Plan, and then to a permitted Subtitle D landfill and disposed as a non-hazardous waste. Off-site transportation and disposal will be conducted in the manner described in Section 5.6 of this VRP Work Plan.*

*Stabilized soil that does not attain either the hazardous waste characteristic standard of 5.0 mg/L lead or the Alternative LDR treatment standard of 7.5 mg/L following the initial stabilization process will be re-stabilized using additional ECOBOND® additive following the procedures described above and re-analyzed for leachable lead content. If the sample results indicate the stabilized soil is a non-hazardous waste, the soil will be transported to the Non-Hazardous Soil Temporary Stockpile and then ultimately disposed at a permitted Subtitle D landfill.*

*In the event treatment using the ECOBOND® additive cannot sufficiently reduce the leachable lead concentration to the applicable treatment standards, the soil will be classified as a hazardous waste. Soil classified as hazardous waste will remain within the Soil Processing Area pending off-site transportation and disposal to a Subtitle C landfill permitted to accept hazardous waste. Hazardous waste will be properly transported and disposed following all applicable local, state, and federal rules and regulations.*

Paragraph 1 of 2.2.2 of the SAP is revised as follows:

*As discussed in Section 5.2 of the VRP Work Plan, approximately 11,778 cubic yards of -1/4-inch material will be generated during the screening process. Material in the -1/4-inch stockpile will likely require stabilization using the ECOBOND® additive as described in Section 5.3 of the Work Plan. Based on previous assessment work conducted at the Site, approximately 19,000 tons of stabilized soil will be generated during the remediation process. The number of Decision Units and sampling frequency necessary to adequately characterize this soil stockpile are provided in Section 2.2 of this SAP.*

**ADEQ Comment No. WP-5:**

The Work Plan, SAP, and Quality Assurance Project Plan (QAPP) should contain a table of applicable regulatory levels to be used for each contaminant of concern at the site. The table should include levels for SRLs, GPLs, TCLP, and UTS.

**US CBP Response:**

We concur that the summary table should be added; however, in order to avoid duplication, the text of the Work Plan only is revised as shown below. As discussed in our response to ADEQ Comment WP-3, we do not believe the UTS is the appropriate regulatory standard for determining whether stabilized soil meets LDR requirements. Therefore, this table provides the Alternative LDR Treatment standard which we believe is the appropriate standard.

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4.3.7 Summary of Applicable Regulatory Levels

Table 4.1 contains a summary of the applicable regulatory standards to be considered for evaluating whether soil remaining on the site meets the requirements to obtain a NFA determination (SRLs and Minimum GPLs) and disposing stabilized soil at an off-site landfill (Hazardous Waste Characteristic Levels and Alternative LDR Treatment standards).

In addition, the Anticipated Remediation Schedule found in Section 4.4, which was numbered as Table 4.1 in the draft VRP Work Plan, is revised to Table 4.2.

TABLE 4.1 SUMMARY OF APPLICABLE REGULATORY STANDARDS							
Contaminant of Concern	Residential SRL (mg/kg)			Non-Residential SRL (mg/kg)	Minimum GPL (mg/kg)	Hazardous Waste Characteristic Limit (mg/L)	Alternative LDR Treatment Standard (mg/L)
	Carcinogen		Non-Carcinogen				
	10 <sup>-6</sup> Risk	10 <sup>-5</sup> Risk					
<b>Metals</b>							
Antimony	NE	NE	31	410	410	N/E	N/E
Arsenic	10	10	10	10	290	5.0	50.0
Lead	NE	NE	400	800	290	5.0	7.5
<b>Polynuclear Aromatic Hydrocarbons</b>							
Anthracene	NE	NE	22,000	240,000	1.02 <sup>a,b</sup>	N/E	N/E
Acenaphthene	NE	NE	3,700	29,000	21.19 <sup>a,b</sup>	N/E	N/E
Acenaphthylene	NE	NE	NE	NE	N/A	N/E	N/E
Benzo(a)anthracene	0.69	6.9	NE	21	1.69 <sup>a,c</sup>	N/E	N/E
Benzo(a)pyrene	0.069	0.69	NE	2.1	0.94 <sup>a,c</sup>	N/E	N/E
Benzo(b)fluoranthene	0.69	6.9	NE	21	0.90 <sup>a,c</sup>	N/E	N/E
Benzo(g,h,i)perylene	NE	NE	NE	NE	N/A	N/E	N/E
Benzo(k)fluoranthene	6.9	69	NE	210	0.47 <sup>a,c</sup>	N/E	N/E
Chrysene	68	680	NE	2,000	0.64 <sup>a,b</sup>	N/E	N/E
Dibenz(a,h)anthracene	0.069	0.69	NE	2.1	4.75 <sup>a,c</sup>	N/E	N/E
Fluoranthene	NE	NE	2,300	22,000	14.33 <sup>a,c</sup>	N/E	N/E
Fluorene	NE	NE	2,700	26,000	26.41 <sup>a,b</sup>	N/E	N/E
Indeno(1,2,3-cd)pyrene	0.69	6.9	NE	21	0.38 <sup>a,c</sup>	N/E	N/E
Naphthalene	NE	NE	56	190	40.06 <sup>a,b</sup>	N/E	N/E
<b>TABLE 4.1 SUMMARY OF APPLICABLE REGULATORY STANDARDS</b>							
Contaminant of Concern	Residential SRL (mg/kg)			Non-Residential SRL (mg/kg)	Minimum GPL (mg/kg)	Hazardous Waste Characteristic Limit (mg/L)	Alternative LDR Treatment Standard (mg/L)
	Carcinogen		Non-Carcinogen				
	10 <sup>-6</sup> Risk	10 <sup>-5</sup> Risk					
Phenanthrene	NE	NE	NE	NE	N/A	N/E	N/E
Pyrene	NE	NE	2,300	29,000	14.19 <sup>a,b</sup>	N/E	N/E
1-Methylnaphthalene	NE	NE	NE	NE	N/A	N/E	N/E
2-Methylnaphthalene	NE	NE	NE	NE	N/A	N/E	N/E

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*Notes:*

*SRL – Soil Remediation Level established by Arizona Department of Environmental Quality; Arizona Administrative Code, Title 18, Chapter 7, Appendix A; January 17, 2007*

*Minimum GPL – Groundwater Protection Level established by the Arizona Department of Environmental Quality; A Screening Method to Determine Soil Concentrations Protective of Groundwater Quality; September 1996*

*Minimum GPLs calculated using Spreadsheet GPL. Minimum GPLs calculated for analytes with an established Aquifer Water Quality Standard (Arizona Administrative Code, Title 18, Chapter 11, Appendix A, Table 1, August 2, 2016)*

*a – Calculated minimum GPL based on saturation limit*

*b – Minimum GPL calculated using Henry's Law Constant (H'), soil organic carbon-water partitioning coefficient (Koc), and Solubility (S) from Spreadsheet GPL dated January 1, 2013, remaining constants are GPL defaults from Spreadsheet GPL dated January 1, 2013, and Aquifer Water Quality Standard (Arizona Administrative Code, Title 18, Chapter 11, Appendix A, Table 1, August 2, 2016)*

*c – Minimum GPL calculated using Henry's Law Constant (H'), soil organic carbon-water partitioning coefficient (Koc), and Solubility (S) from EPA Regional Screening Level (RSL) Chemical-specific Parameters Supporting Table (May 2018), remaining constants are GPL defaults from Spreadsheet GPL dated January 1, 2013,*

*mg/kg – milligrams per kilogram*

*NE – Not Established*

*N/A – Not Applicable*

**ADEQ Comment No. WP-6:**

The Work Plan should contain a contingency plan for soil that does not meet the applicable UTS and is still considered hazardous waste.

**US CBP Response:**

We concur with this comment that the Work Plan should contain a contingency plan for soil that does not meet the applicable regulatory standard and is still considered a hazardous waste. However, as discussed in the response to ADEQ Comment WP-3, we do not believe the UTS is the appropriate regulatory standard for determining whether stabilized soil meets LDR requirements. Therefore, Section 5.4 of the Work Plan is revised to provide a contingency plan for soil that does not meet the Hazardous Waste Characteristic Regulatory Limit or Alternative LDR Treatment standard. See response to ADEQ Comment No. WP-4 for revised language.

**ADEQ Comment No. WP-7:**

The Work Plan should describe the plan for soil underneath the Soil Processing Area once soil processing is completed.

**US CBP Response:**

The text is revised to add a new paragraph in Section 5.2 immediately following Table 5.1 as follows:

*Once soil processing is complete, including the areas beneath the screen and associated equipment, the screen and associated equipment and materials will be removed from the Soil Processing Area, and no additional soil will be transported onto this area. The Soil Processing Area will be sub-divided into Decision Units and sampled using the methodology*

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*described in Section 2.4 of the SAP to verify the soil below the temporary stockpile area does not contain concentrations of the Site COCs above their respective SRLs or minimum GPLs.*

The text of the SAP is revised to include a new Section 2.4 as follows:

*Soil underlying the Soil Processing Area and Non-Hazardous Soil Temporary Stockpile Area will be assessed following removal of soil and equipment to verify soil containing COCs in concentrations greater than the minimum GPLs or residential SRLs is not present. Soil samples will be collected using an incremental soil sampling methodology following the procedures outlined in this section.*

*The remediation contractor will establish an approximate 1/4-acre coordinate grid across the areas. These 1/4-acre grids will represent incremental sampling Decision Units. Prior to field activities, the locations of each corner of the Decision Unit will be calculated and placed into a Keyhole Markup Language (.kml) file. The .kml file will be uploaded to a Global Positioning System (GPS) unit with sub-meter accuracy which will be used to mark the corner points (north, south, east, and west) of the Decision Unit in the field. The boundaries of the locations will be identified as:*

AAA - DU#-X

Where: AAA – Area (SPA for Soil Processing Area or TPS for Temporary Stockpile Area)  
DU# – Decision Unit number  
X – corner point direction (north, south, east, or west)

*The procedures outlined in Section 2.1 of the SAP for establishing the Decision Units, collecting primary and duplicate samples, calculating the RSD, and using the XRF to evaluate samples for submittal to the analytical laboratory will be used to evaluate soil underlying the Soil Processing Area and Non-Hazardous Soil Temporary Stockpile Area. If the lead concentration measured by the XRF analyzer is less than 225 mg/kg, the sample will be prepared in accordance with the procedure discussed in Section 2.1 of the SAP and the sample will be submitted to the analytical laboratory for analysis of lead, arsenic, and antimony using EPA Method 6010C and PAHs using EPA Method 8270. No further excavation will be conducted within this Decision Unit unless the results from the analytical laboratory demonstrate that COCs are present in the sample at a concentration greater than the minimum GPL or residential SRL. In the event that the lead concentration measured by the XRF analyzer is greater than 225 mg/kg or any of the COC concentrations in the sample is greater than the minimum GPL or residential SRL, the remediation contractor will excavate additional soil from the Decision Unit, the depth of which will be determined based on professional judgment of the remediation contractor, and the lead concentration in soil will be reevaluated using the XRF analyzer and/or additional analytical laboratory testing using EPA Method 6010C and/or EPA Method 8270. Sample will be collected from the*



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*additional excavated soil, if any, and will be evaluated in the manner described in Section 2.2 of the SAP to identify appropriate treatment and/or disposal options.*

**ADEQ Comment No. WP-8:**

On the Legend of Figure 15, the title for the orange color does not appear to accurately represent the orange color on the map.

**US CBP Response:**

The text in the Legend of Figure 15 is revised as follows:

*Non-Hazardous Soil Temporary Stockpile Area*

**ADEQ Comment No. WP-9:**

On Page 43, please note the language for the proposed sign must be approved by the VRP prior to posting.

**US CBP Response:**

The text has been revised as follows:

*The language for the proposed sign will be approved by VRP prior to posting, and the sign will be installed at least 10 days prior to initiating site remediation.*

**ADEQ Comment No. WP-10:**

Appendix B Section 8.3.3 states Data Validation is not anticipated. For this site, the VRP requests the use of Level II Data Validation.

**US CBP Response:**

The text in Section 8.3.3 is revised as follows:

*Level II Data Validation will be performed on 100 percent of the analytical data and will include reviewing the following:*

**REVISIONS EMAIL**

**ADEQ Comment No. RE-1:**

The VRP concurs with proposed revisions 1, 2, 3, 4, 5, 6, and 7.

**CBP Response:**

**Revision 1 - Appendix A – Sampling and Analysis Plan (SAP), Section 2.1, Page A-3, Paragraph 2**

The text is revised as follows:

*The incremental samples from the Decision Unit will be thoroughly mixed and then screened with a No. 4 (4.75 millimeter (mm)) and No. 10 (2.00 mm) sieve to remove bulk debris.*

**Revision 2 - Appendix A – SAP, Table 2.1 and Table 2.2, Section 2.2 (page A-4 through A-5)**

The text is unchanged.

**Revision 3 - Appendix A – SAP Section 2.2.1 (page A-6)**

The text is revised as follows:

*The incremental samples from the Stabilized Soil Decision Unit will be thoroughly mixed and screened with a No. 4 (4.75 mm) and No. 10 (2.00 mm) sieve to remove bulk debris. The soil will be evenly spread on a steel tray at approximately ½-inch in depth.*

**Revision 4 - Appendix A – SAP Section 2.2.1 (page A-6)**

The text is revised as follows:

*The soil in the tray will be divided into 50 sections and a small spatula will be used to fill two 4-oz clear glass jar for analysis of lead, antimony, arsenic, and lead using EPA Method 6010; TCLP analysis of lead and arsenic using EPA Methods 6010/1311; analysis of PAHs using EPA Method 8270. ~~The samples will be placed in 2-ounce (oz) clear glass jar.~~*

**Revision 5 - Appendix A – SAP Section 2.2.2 (page A-6 through A-7)**

**Revision 6 - Appendix A – SAP Section 2.2.2 (page A-7)**

The text is revised as follows:

*The incremental samples from the Stabilized Soil Decision Unit will be thoroughly mixed and screened with a No. 4 (4.75 mm) and No. 10 (2.00 mm) sieve to remove bulk debris. Once the greater than 2 mm fraction is removed from the sample, the remaining soil will be evenly spread on a steel tray at approximately ½-inch in depth. The soil in the tray will be divided into 50 sections and a small spatula will be used to fill two 4-oz clear glass jar for analysis of lead and arsenic using EPA Method 6010 and TCLP analysis of lead and arsenic using EPA Methods 6010/1311. ~~The samples will be placed in 2-ounce (oz) clear glass jar.~~*

**Revision 7 - Appendix A – SAP Section 2.3 (page A-7)**

The text is revised as follows:

*The composite sample will first be screened with a No. 4 (4.75 mm) and No. 10 (2.00 mm) sieve to remove bulk debris. Once screened, approximately 5 grams of the material less than 2.00 mm will be screened with the XRF for lead concentrations as described below.*

**ADEQ Comment No. RE-2:**

The VRP does not concur with proposed revision 8. Please collect duplicate samples at a frequency of 10% or minimum one per day as specified in Section 3.3.1 of the QAPP.

**CBP Response:**

Comment noted. The text is unchanged.

## **RECOMMENDATIONS**

### **ADEQ Comment No. R-1:**

When UXO is identified at the site, the VRP recommends using the following guidance which can be found at: <https://www.publications.usace.army.mil/USACE-Publications/Engineer-Manuals/> and <https://www.wbdg.org/ffc/dod/manuals> and <https://www.hSDL.org/?abstract&did=704323>

- USACE, 2015. EM 200-1-15, Technical Guidance for Military Munitions Response Actions. October 30.
- USACE, 2013. EM 385-1-97, Explosives - Safety and Health Requirements Manual. May 17.
- DoD, 2008. DoD Manual 6055.09-M, DoD Ammunition and Explosives Safety Standards: Criteria for Unexploded Ordnance, Munitions Response, Waste Military Munitions, and Material Potentially Presenting an Explosive Hazard. February.
- DoD, 2010. DoD 6055.09-M, Ammunition and Explosive Safety Standards, Administrative Reissue.
- DoD, 2012. DoD Manual 4715.20, DERP Management. March 9.
- DoD Explosives Safety Board, 2016. Technical Paper 18, Minimum Qualifications for Personnel Conducting Munitions and Explosive of Concern-Related Activities. September 1.

### **CBP Response:**

Comment noted. As discussed in Section 4.1 of the Work Plan, the remediation contractor will prepare a supplement to the Health and Safety Plan to address Munitions and Explosives of Concern (MEC) during remediation. This plan will incorporate Department of Defense, US Corps of Engineers, and other regulatory guidance as necessary to assure UXO-related dangers are avoided and/or properly addressed.

## **ADDITIONAL REVISIONS**

Additional revisions to the text are made to correct typographical errors or references to incorrect sections as follows:

### **Work Plan, Section 5.5, Paragraph 2**

*The temporary stockpile area will be sub-divided into Decision Units and sampled using the methodology described in Section 2.4 of the SAP to ensure soil below the temporary stockpile area does not contain concentrations of the Site COCs above their respective SRLs or minimum GPLs. (Note: Section 2.4 of the SAP is newly inserted in response to ADEQ Comment WP-7).*

### **Work Plan, Section 5.7, Paragraph 2**

*The procedures used to collect the soil samples are outlined in Section 2.1 of the SAP in Appendix A of this Work Plan. In addition, quality assurance/quality control (QA/QC) samples*

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*will be collected as described in the SAP and Quality Assurance Project Plan (QAPP) in Appendix B of this Work Plan.*

Prepared By: Tod Whitwer, PE

Date: October 16, 2019

