

July 28, 2020

Nichole Osuch, Project Manager
Voluntary Remediation Program
Arizona Department of Environmental Quality
Remedial Projects Unit
1110 W. Washington Street
Phoenix, Arizona 85007

Subject: No Further Action Report
US Customs and Border Protection
Properties Adjacent to Former US CBP Small Arms Firing Range AZ0047
1651 W. Target Range Road; Nogales, Arizona (Also Known as Arbo Range)
VRP Site Code: 513182-00

Dear Ms. Osuch:

The United States Customs and Border Protection (CBP) submitted a Site Characterization and Remediation Completion Report dated May 20, 2020 (Completion Report) that demonstrated the remediation levels and controls determined pursuant to the Arizona Revised Statutes (A.R.S. § 49-175) were achieved at the above-referenced site. In a letter to CBP dated June 29, 2020, ADEQ documented its approval that the data presented in the Completion Report met the remediation levels determined pursuant to the A.R.S. § 49-175 and CBP could proceed with a request for an NFA determination by fulfilling the requirements of A.R.S. § 49-181. AECOM Technical Services (AECOM), on behalf of CBP, is submitting this No Further Action (NFA) report for the above-referenced site in accordance with A.R.S. § 49-181.

1. Draft public notice

See Attachment 1

2. Scaled site map of the NFA boundary

See Attachment 2

3. Description of the specific contaminants for which an NFA determination is being sought

Metals (soil)	Polynuclear Aromatic Hydrocarbons (soil)
Antimony	Anthracene
Arsenic	Acenaphthalene
Lead	Benzo(a)anthracene
	Benzo(a)pyrene
	Benzo(b)fluoranthene
	Benzo(k)fluoranthene
	Chrysene
	Dibenz(a,b)anthracene
	Fluoranthene
	Fluorene
	Indeno(1,2,3-cd)pyrene
	Naphthalene
	Pyrene

4. Description of the actions taken to achieve remediation levels or controls

The Site covered approximately 32 acres and was comprised of Santa Cruz County Assessor Parcel Numbers (APNs) 113-49-002D and 113-49-027D, and portions of APNs 113-49-002C, 113-49-006A, and 113-49-006B. The chemicals of concern (COCs) at the Site were arsenic, antimony, lead, and polynuclear aromatic hydrocarbons (PAHs). Soil remediation, consisting of excavation, screening, stabilization, and off-site disposal at a Resource Conservation and Recovery Act (RCRA) Subtitle D

landfill was conducted over approximately 9 acres of the Site. Site assessment and remediation was conducted in accordance with the ADEQ-approved Voluntary Remediation Program Work Plan, U.S. Customs and Border Protection, Properties Adjacent to Former US CBP Small Arms Firing Range AZ0047, 1651 West Target Range Road, Nogales, Arizona (Also Known as Arbo Range) dated January 9, 2020.

131 Decision Units (DUs), each covering approximately ¼-acre, were established across the areas for which an NFA Determination was to be sought. Of the 131 DUs, 64 DUs did not require soil excavation; soil samples were collected from these areas using an incremental sampling methodology and confirmed to contain COCs in concentrations less than the minimum Groundwater Protection Levels (GPLs) or residential Soil Remediation Levels (SRLs).

The remaining 67 DUs for which previous assessments indicated COCs were present in concentrations greater than the minimum GPLs and/or residential SRLs were excavated to the depths outlined in the Work Plan to remove soil containing COCs in concentrations greater than the minimum GPLs or residential SRLs. These DUs were excavated and soil samples were collected using the incremental sampling methodology. Soil samples collected from 16 DUs following initial excavation contained lead in a concentration greater than the minimum GPL or residential SRL and a soil sample collected from DU-32 following initial excavation contained arsenic in a concentration greater than the residential SRL. Therefore, these areas were further excavated one or more times until samples collected from these areas contained COCs at concentrations less than the minimum GPL and residential SRL.

Soil assessment was conducted in two stockpile areas within the Soil Processing Area: one used for initial storage of cleared vegetation and the second for bulk storage of ECOBOND® additive, a phosphate-based stabilizing agent which was mixed with screened soil to stabilize the soil such that the lead concentration does not exceed the hazardous waste characteristic of 5 milligrams per liter (mg/L). Following removal of the vegetation and ECOBOND®, soil in each area was excavated, and soil samples were collected from these areas using an incremental sampling methodology and confirmed to contain COCs in concentrations less than the minimum GPLs or SRLs.

Soil assessment was conducted in the Non-Hazardous Soil Temporary Stockpile Soil where stabilized soil was stockpiled prior to off-site disposal. A soil sample was collected from this area using an incremental sampling methodology and confirmed to contain COCs in concentrations less than the minimum GPLs and residential SRLs.

An estimated 17,551 cubic yards of soil were excavated and processed in a screening plant equipped with a 1-inch screen and ¼-inch screen. Material that did not pass the 1-inch mesh (+1-inch material), primarily larger rocks and vegetation, was conveyed from the screening plant and stockpiled (referred to as +1-inch material stockpile). Material passing through the 1-inch screen (-1-inch material) was conveyed to a second, ¼-inch screen. Material that did not pass through the ¼-inch screen (+¼-inch) consisted of bullet fragments, vegetation, and gravel. The +¼-inch material was conveyed out of the screening plant to a separate stockpile pending further analysis (referred to as the -1-inch to +¼-inch material stockpile). The soil that passed through the ¼-inch mesh (-¼-inch) was the fine, lead-impacted soil that required stabilization such that the lead concentration did not exceed the hazardous waste characteristic limit. This -¼-inch material was conveyed to a separate stockpile pending further treatment (referred to as the -¼-inch material stockpile).

Sixty stockpiles of stabilized soil and three stockpiles weighing 15,910 tons were transported from the site and disposed at the RAD Durham Landfill in Florence, Arizona. Bullet fragments weighing 1,543 pounds, were recovered from the screening process and recycled at Tucson Iron Metal in Tucson, Arizona.

Confirmation soil samples collected from the 131 DUs, three additional Soil Processing Area Decision

Units, and the Non-Hazardous Soil Temporary Stockpile following excavation, as necessary, contained antimony, arsenic, lead, and PAHs in concentration less than the minimum GPLs and residential SRLs. Sample results collected in support of this program were found to meet the data quality objectives described in the VRP Work Plan. Applicable ADEQ and EPA environmental rules and regulations were followed throughout the remediation activities including soil treatment, handling, transportation, and soil disposal.

5. Description of any soil, water, or soil and water treatment systems used as part of the remediation

As described in Item No. 4, an estimated 17,551 cubic yards of soil was excavated and processed in a screening plant equipped with a 1-inch screen and ¼-inch screen. Approximately 15,910 tons of soil passed through the ¼-inch mesh (-¼-inch) was assumed to be impacted with lead above the Minimum GPL or residential GPL for lead and, therefore, required off-site disposal. ECOBOND® additive, a phosphate-based stabilizing agent, was mixed with screened soil to stabilize the soil such it could be disposed off-site as a non-hazardous waste because the lead concentration did not exceed the hazardous waste characteristic of 5 milligrams per liter (mg/L).

6. Institutional or engineering controls

There will be no institutional or engineering controls at the site.

7. Post-remediation monitoring

There will be no post-remediation monitoring at the site.

8. Description of community involvement activities

The following activities were conducted to notify the community of the site remediation activities:

- 1) ADEQ provided notification to the public that the Work Plan for site remediation was available for public review and comment. The comment period lasted from November 8, 2019 through December 9, 2019. ADEQ received no public comments.
- 2) The Site owners, Nohe Garcia, Nakita Kyriakis, and Paul Arbo, were notified via in-person contact and electronic mail on November 4, 2020 that remediation activities were initiated. The Site owners were periodically updated with the status of the remediation activities both via electronic mail and in person.
- 3) An informational sign was posted notifying the public that remediation of the Site was occurring under the oversight of ADEQ's VRP. The language on the sign was approved by VRP prior to posting and was installed at least 10 days prior to initiating site remediation. Contact information for ADEQ and the remediation contractor was posted on the sign. The informational sign was posted at the northern entrance to the Site adjacent to La Quinta Road.
- 4) A document repository accessible to the public was established so that the public could review information regarding the site. The repository was located at the site trailer in the Staging area and was accessible during normal business hours or by appointment.

9. List of permits obtained

The following permits were obtained:

- Arizona Department of Environmental Quality. Arizona Pollutant Discharge Elimination System (AZPDES) permit coverage for stormwater discharges – coverage under the Construction General Permit No. AZCN79238.
- Santa Cruz County. Floodplain Use Permit.



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Please contact Tod Whitwer at tod.whitwer@aecom.com or via cell phone at (602) 370-4646 should you have any questions regarding this NFA Report.

Sincerely yours,

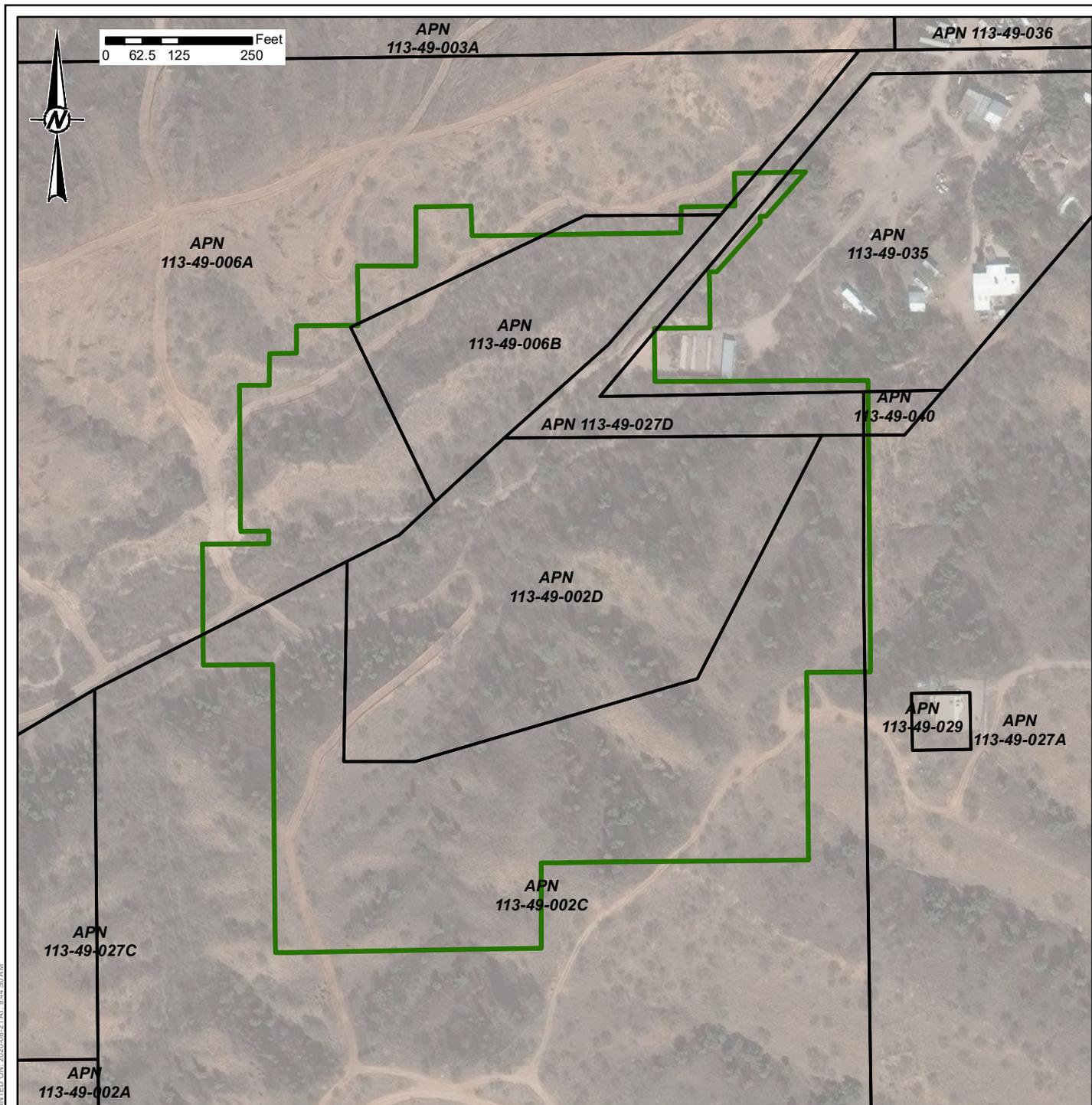
AECOM Technical Services, Inc.



Tod Whitwer, PE
Principal Project Manager

Attachments

- 1 Draft Public Notice
- 2 Site Map of the NFA Boundary



LEGEND

- APPROXIMATE NFA BOUNDARY
- APPROXIMATE PROPERTY BOUNDARIES

REFERENCE

1. AERIAL IMAGERY: ESRI, METRO, MAXAR, 2019.
2. PROPERTY BOUNDARIES DIGITIZED FROM IMAGE EXPORTED FROM SANTA CRUZ COUNTY ONLINE PARCEL VIEWER, APRIL 2020.

CLIENT



U.S. CUSTOMS AND
BORDER PROTECTION



PROJECT

PROPERTIES ADJACENT TO FORMER U.S. CBP SMALL ARMS FIRING
RANGE AZ007 (ARBO RANGE)
NOGALES, AZ
VRP SITE CODE: 513182-00

TITLE

**FIGURE 1
NO FURTHER ACTION DETERMINATION**

CONSULTANT



YYYY-MM-DD	2020-08-21
PREPARED	KJC
REVIEWED	-
APPROVED	-

PROJECT NO.
19130453