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Sent: Friday, March 30, 2018 9:44 PM
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Subject: Public Comment - Proposed Remediation Action - CBP Firing Range - Nogales, Az

March 30, 2018

David Clark, USACOE Project Manager
819 Taylor Street
Fort Worth, Texas 76102

David,

I was in attendance during the lead remediation meeting with the USACOE and Sol-JCP, LLC and have since reviewed the remediation plan as well as the Allwyn Studies conducted in 2009 and 2017. I would like to express my concerns regarding the lead remediation with the intentions of coming to a resolution that will best serve the citizens of Nogales and other potentially affected communities.

The remediation plan only addresses the firing range itself, 0.5 acres, and fails to address the effect of the firing range activities on surrounding properties that, in some areas, exceed non-residential lead concentrations of 800mg/kg. High concentrations of lead contamination extend across another 12.8 acres in addition to Paul Arbo's property, the owner of the land leased by Border Patrol. Failing to address the known condition of, and remediate the surrounding properties will prevent any individual parcel from receiving NFA clearance until the entire contaminated area is remediated. Based on this information, a "Determination of No Further Action" (NFA) is not feasible. The benefits of the lead clean up would be negligible and cost in-effective; both contradictions to the USACOE objectives. The remediation should be revised to include all of the land contaminated by the Border Patrol firing range; even that which has yet to be discovered.

Further discussing cost effectiveness, the remediation plan states that the hazardous waste material will be transported to Beatty, NV, where it will be decontaminated and disposed of. This proposed plan is expected to cost approximately 3.7 million dollars. Have other options been considered? If the lead were to be treated on site and transported as nonhazardous waste to a disposal site in Marana, the cost of this project would be significantly reduced. In correspondence with Allwyn Consultants, removal of the contaminants from all 13 acres of land, including disposal, is estimated to cost 3.8 million dollars.

Paul Arbo, has confirmed that while drilling his personal well, a perched water table was discovered beneath the property. At some point this water spills over in to the deeper water table used by our

community. This well, perched system, and associated waterways should be studied and monitored to address any potential and/or present contamination issues before they flow into the deeper aquifer that supplies the city with its drinking water. This is an un-addressed threat to the city's water supply that must be mitigated before the contamination shows up in the household water of Nogales, Rio Rico, or any city stretching North along the Santa Cruz river.

The remediation plan does not adequately resolve the full scope of the lead contamination and poses a threat to the economic future of Nogales and a health crisis to its citizens. This letter does not necessarily represent a complete record of all the issues regarding the remediation plan; however, I would urge that the revision is an all-encompassing effort to restore all of the properties to their background environmental contamination levels. USACOE, ADEQ, Border Patrol, and its affiliates should provide a comprehensive remediation plan that addresses all impending and potential hazards; stated as well as not stated areas of concern.

Matthew Barr

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