



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Patrick J. Cunningham
Acting Director

April 20, 2009

VRP 09:178

Mr. Hector Martinez
City Manager's Office
City of Tucson
PO Box 27210
Tucson, Arizona 85726-7210

RE: No Further Action Determination for Lead, Antimony, Arsenic, and Copper in Soil
Silverbell Firing Range, Tucson, AZ
Site Code: 509810-00

Dear Martinez:

The Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) hereby grants the City of Tucson (COT) City Manager's Office a No Further Action (NFA) determination for soil in the area (see map) which is located at the Silverbell Firing Range in Tucson, Arizona. ADEQ has determined the Site has met all the requirements specified in Arizona Revised Statute (A.R.S.) §49-181 for lead, antimony, arsenic, and copper, for which COT has requested an NFA. The NFA determination is based on remedial activities and results from confirmation soil sampling detailed in the following documents:

- *Silverbell Firing Range Operations & Maintenance Final Report*, May 2008
- *Operations & Maintenance Report Silverbell Firing Range*, August 15, 2008
- *Request for No Further Action*, February 11, 2009
- *Revised No Further Action Boundary Map*, March 4, 2009

Please note the NFA is granted with the limitations described at A.R.S. §49-181(E) and A.R.S. §49-181(F) and does not address any other area of land, groundwater or any other contaminants.

The NFA determination is based on the following:

1. Of the eight Primary Berm Clearance Samples, 100% were sampled for lead and 38% of the samples (three samples) were sampled for arsenic, antimony, and copper. Of the five samples collected for lead only, one sample had lead exceedence which was characterized to below the residential Soil Remediation Level (SRL) with a confirmation sample collected in the same location after additional excavation activities were conducted.

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400 West Congress Street • Suite 433 • Tucson, AZ 85701
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Of the three samples collected for all four metals, none of the samples contained copper or arsenic exceedences. Two of the samples contained lead exceedences. One of these samples also contained an antimony exceedence. This antimony exceedence, as well as the lead exceedences, were characterized to below the residential SRLs in deeper confirmation samples.

2. Of the eight Secondary Berm Clearance Samples collected, 100% were sampled for lead and 38% of the samples (three samples) were sampled for arsenic, antimony, and copper. Of the five samples collected for lead only, none of the samples had lead exceedences. Of the three samples collected for all four metals, none of the samples contained copper or arsenic exceedences. One sample contained a lead and antimony exceedence. The lead and antimony exceedences were characterized to below the residential SRLs in a deeper sample.
3. Of the 12 (twelve) Range Floor Clearance Samples collected, 100% were sampled for lead and 33% of the samples (four samples) were sampled for arsenic, antimony, and copper. Of the eight samples collected for lead only, four had lead exceedences which were characterized with confirmation samples collected in the same location after additional excavation activities were conducted. Of the four samples collected for all four metals, none of the samples contained copper exceedences. Three samples contained lead, antimony, and arsenic exceedences. All three of these samples were characterized to below the residential SRLs in a deeper samples.
4. Based on this information, the VRP determined that enough spatial representation exists to consider the firing range floor and berms sufficiently characterized to below the residential SRLs (and applicable Groundwater Protection Levels) for arsenic, antimony, lead, and copper.
5. COT published the Public Notice for a Request for No Further Action Determination in the Arizona Daily Star on March 8, 2009, commencing the 30-day public comment period required by A.R.S. §49-176. The notice period concluded on April 9, 2009 with no public comments received.

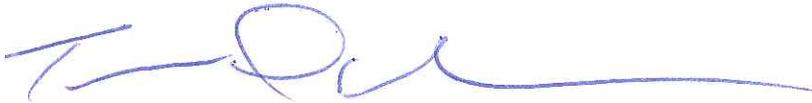
Pursuant to A.R.S. §49-181(F), a NFA determination under this section means that no further action shall be taken by the Department under this title to remediate or require remediation of the Site or portion of the site covered by the NFA determination, unless the NFA determination is rescinded or amended pursuant to A.R.S. § 49-181(E). An NFA determination does not release or discharge any person from liability for a release of contaminants not covered by the work plan approved pursuant to A.R.S. §49-177 or outside the boundary of the Site or portion of the site covered by the determination. An NFA determination shall not preclude the Director from obtaining access to the area covered by the determination under this section or any other law.

Pursuant to A.R.S. §49-181(E), the Department may rescind or amend the NFA determination for any of the following reasons: 1) On discovery of new information that would result in the potential denial of an NFA request; 2) Information originally submitted to the Director was

inaccurate, misleading or incomplete; 3) The reopening of an investigation or the taking of a remedial action is necessary to respond to a release or the threat of a release of a contaminant that may present an imminent and substantial danger to the public health or welfare or the environment. Pursuant to A.R.S. §49-184, the ADEQ reserves the right to recover penalties or to take any action authorized by law for any violation of A.R.S. Title 49.

If you have any questions, please contact me at (602) 771-4229.

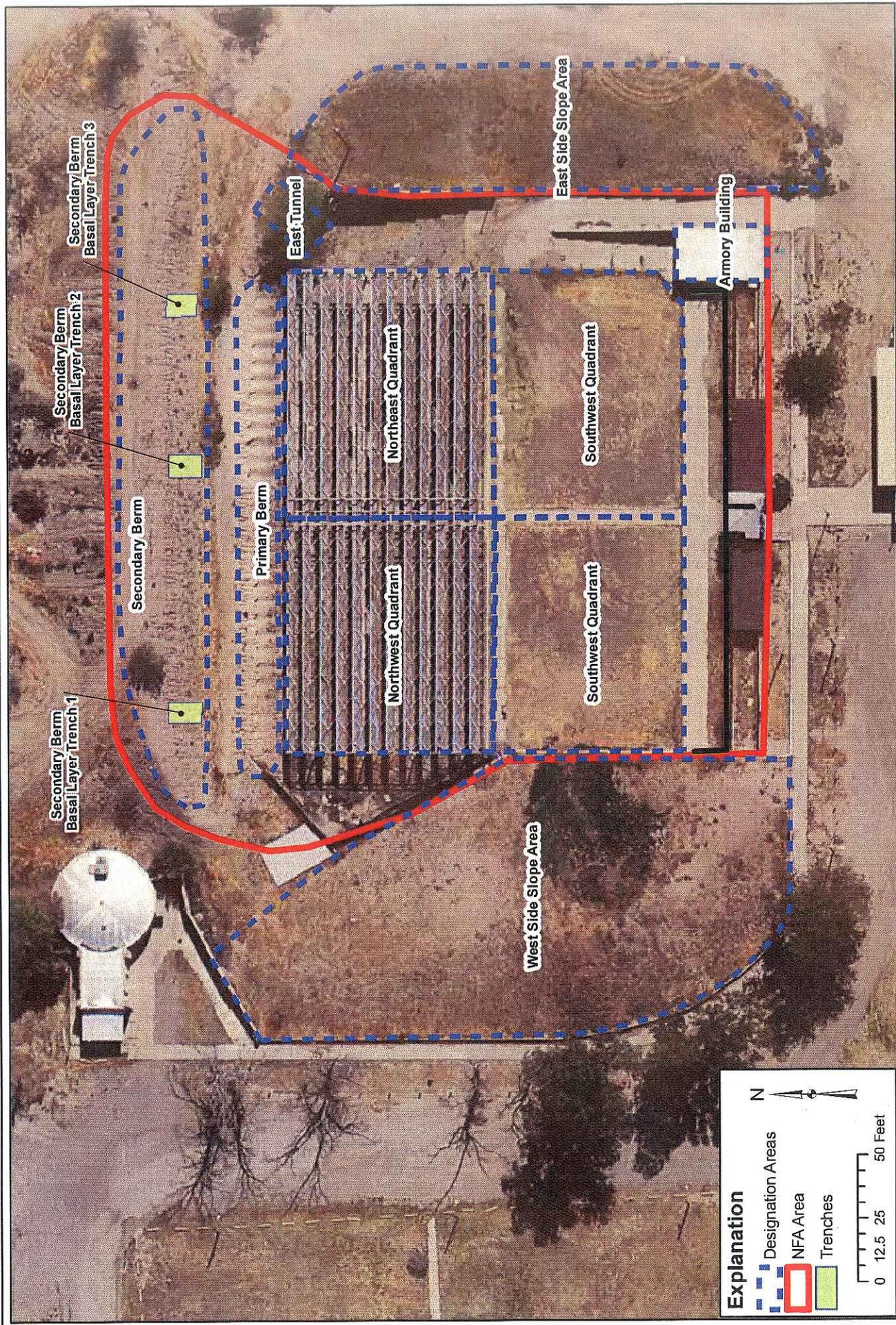
Respectfully,



Thomas DiDomizio, Acting Unit Manager
Voluntary Remediation Program
Waste Programs Division

Attachment: Figure - No Further Action Boundary

cc: Ms. Nancy Petersen, Deputy Director, City of Tucson Environmental Services
Mr. Richard Byrd, Senior Hydrologist, City of Tucson Environmental Services



Drawn By: LE
 Checked: RB
 Approved: RB
 Date: 3/3/2009
 File: See Below
J:\GIS\Silverbell\2008\FireRangeVFA.mxd

No Further Action Soil Boundary Area Map
 Silverbell Firing Range
 VRP Site Code 509810-00
 February 2009

Explanation

- Designation Areas
- NFA Area
- Trenches

N
 0 12.5 25 50 Feet

