

From: [Fernandez, Juliette](#)
To: [Harden, Tasha](#); [Radke, Bill](#)
Subject: Fw: [EXTERNAL] FW: Landlock (UNCLASSIFIED)
Date: Thursday, June 4, 2020 3:44:31 PM

FYI

Juliette Fernandez
Refuge Supervisor AZ/NM

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Subject: Re: [EXTERNAL] FW: Landlock (UNCLASSIFIED)

Hi Shelly,

Thank you for reaching out with this request and the supporting information. After reviewing and researching the topic, we offer the following comments.

NPS Dust Abatement Review of Products

Please note that many soil stabilizing dust abatement products have not received full environmental reviews that have been scientifically evaluated nor have they received full and rigorous long-term environmental proofing. NPS comments are based on available information, which may be lacking.

In general, the lignin products seem to be more environmentally compatible but may not be as durable, especially with continual use by heavy equipment. These products would need to be applied per the label which includes scarifying, applying product and water and compaction and may need reapplication from time to time. These products can be fed to cattle and this would hopefully translate to no toxicity and no environmental hazard concerns within the park if applied properly.

The OPS products are noted as slightly toxic to humans but are considered by the industry to be environmentally safe, as stated in their environmental document. The chemical bonds readily with soil and, once cured, will remain on the roadbed as a fairly stable "cement-like" surface. Reapplication would possibly not be required through the duration of the project for

most locations and can handle heavy equipment possibly more effectively than other products. Restoration of an area with OPS surfaces can be ripped and the surface material pulverized and seed can be applied. If the environmental document is accurate, the NPS main concern will be that OPS products create a “cement-like” somewhat impermeable surface. This would leave the roads with a greater potential for storm run-off and all water conveyance structures may have to be improved to handle greater flow, in some cases, new structures may need to be constructed to reduce the force of stormwater into the systems water will drain to.

For the use of either product, NPS would request that for storage/staging of these products, containment areas be established using BMPs, to ensure being capable of arresting and containing leaks and recovering any spills, ex. have proper equipment available – the OPS recommends cleanup using vacuum trucks.

We would appreciate hearing back what the final decision/application ends up being.

Thank you,

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Good morning,

In an effort to reduce safety hazards and water usage related to dust control across the project areas, we have been looking in to a variety of dust suppressant products. I am attaching a spreadsheet of items that we have looked at to date that I would like a little more feedback from you all if possible.

The attached product information for LandLock OpsDirt is for a product that is being utilized on the access roads in the Jacumba Wilderness Area in the El Centro area. This treatment is intended to be a one-time soil treatment that can stand up to the construction traffic for a longer term solution and should not require repeated treatment.

Many of the other products are topical products that could require multiple applications depending upon weather and traffic conditions.

As it is getting hotter and drier at this time, providing the contractors with a few alternatives is a high priority for USACE, both for safety, dust control, and to reduce the water usage on all of the project sites. A large portion of their current water use is directed towards dust control at this time.

Please review the attached product information and the spreadsheet with my notes to date on the other dust suppressant products we have inquired about to date. I would appreciate feedback from you by COB Friday if at all possible. I have added weblinks to each of the products where available, but do have additional product information that I could send you if needed.

Additionally, the brochure from the USDA that Paul Enriquez discussed on a recent conference call is attached for your review as well.

Thank you,

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