



BRUCE KING
GOVERNOR

State of New Mexico

ENVIRONMENT DEPARTMENT

ENTERED

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

July 17, 1992

Mr. Fazlur Rab, Environmental Engineer
U.S. Army Air Defense Artillery Center and Fort Bliss
ATZC-ISE-E
Fort Bliss, TX 79916-0058

Dear Mr. Rab:

Under the auspices of the Defense-State Memorandum of Agreement (DSMOA) to which New Mexico is signatory, I have coordinated a review of the Sept. 1991 RCRA Facility Investigation Report (RFI) among the affected bureaus within the New Mexico Environment Department (NMED). The two sites discussed in the report are the McGregor Range Fire Training Area and the Orogrande Oxidation Lagoon. Based on NMED review of the report we offer the following comments for your consideration.

While EPA Region 6 retains RCRA corrective action authority at present, the NMED Hazardous and Radioactive Materials Bureau (HRMB) expects to receive authority over that part of the RCRA program within the next year or two. HRMB staff does not believe that the data submitted in the RFI adequately fulfills the contamination characterization objective given in the U.S. EPA "RCRA Corrective Action Plan Guidance", OSWER Directive 9902.3 (EPA/530-SW-88-028), and may have difficulty accepting remediation decisions based solely on those data.

The stated objective is:

Task IV: Facility Investigation

The Owner/Operator (respondent) shall conduct those investigations necessary to: characterize the facility (Environmental Setting); define the source (Source Characterization); define the degree and extent of of contamination (Contamination Characterization); and identify actual or potential receptors."

The RFI activities performed at both SWMU 21 and 25 described above did not fully determine the vertical or horizontal extent of contamination. Under the RFI guidance, it must be emphasized that the total extent of contamination is to be determined, not just the

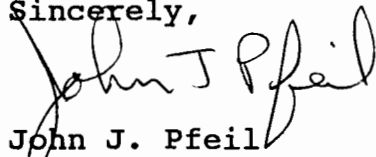


July 17, 1992
Mr. Fazlur Rab - RFI comments
Page 2

apparent absence of contamination in excess of action levels. The lack of complete characterization of the extent of soil contamination may result in data of inadequate technical quality to support the development and evaluation of the Corrective Measures Study.

Please contact me (505-827-2776) or David Morgan (827-2754) if you have any questions, or if we can be of any assistance.

Sincerely,

A handwritten signature in cursive script that reads "John J. Pfeil". The signature is written in black ink and is positioned above the typed name.

John J. Pfeil
Environmental Specialist, DSMOA Program
Ground Water Protection and Remediation Bureau

c: Edward Horst, Hazardous and Radioactive Materials Bureau