



BRUCE KING  
GOVERNOR

State of New Mexico

ENVIRONMENT DEPARTMENT

JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
DEPUTY SECRETARY



ENTERED  
Steve

Ms. Elza Cushing, Environmental Engineer  
U.S. Army Air Defense Artillery Center and Fort Bliss  
ATZC-ISV  
Fort Bliss, TX 79916-0058

Dear Ms. Cushing:

Under the auspices of the Defense-State Memorandum of Agreement (DSMOA) to which New Mexico is signatory, I have coordinated a review of the June 1992 Preliminary Draft Corrective Measures Study (CMS) for the Orogrande Oxidation Lagoon, also known as solid waste management unit (SWMU) 25B. Based on review of the report by affected bureaus within the New Mexico Environment Department (NMED) we offer the following comments for your consideration.

As I mentioned in my letter to Mr. Fazlur Rab dated July 17, 1992, we do not believe that the data submitted in the RFI dated Sept. 1991 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).

Specifically, the RFI activities performed at SWMU 25B do not fully determine the vertical or horizontal extent of contamination. Under the RFI guidance the total extent of contamination is to be determined, not just the apparent absence of contamination in excess of action levels. The lack of complete characterization of the extent of soil contamination has resulted in data of inadequate technical quality to support the evaluation in the CMS.

In addition to the above concerns, it should be noted that landfill disposal of contaminated soils containing concentrations in excess of 1000 mg/kg TPH is not allowed under the New Mexico Solid Waste Management Regulations dated December 31, 1991 (Part VII, Section 708, E-2).

For the reasons stated above NMED does not approve the CMS for the Orogrande Oxidation Lagoon.

White Sands Missile Range (WSMR) performed an RFI investigation in August 1992 at the site using the data generated by Fort Bliss in conjunction with their own investigation. Recommendations for

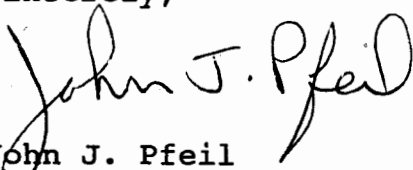
Cushing letter  
CMS comments  
November 5, 1992  
Page 2

Phase II activities include further sampling to define the extent of the contamination and to estimate the mobility of the detected constituents. It appears the WSMR investigation may result in adequate data to characterize the site. Consequently, NMED suggests that Fort Bliss coordinate with WSMR and wait for the results of their Phase II sampling effort.

I would like to reiterate on behalf of NMED's Ground Water Section that a discharge plan is required for this site unless the site is no longer in use; if not in use a letter certifying this must be sent to the Ground Water Section. Continued use of the site without the required discharge plan is a violation of NMWQCC regulations.

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,



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

c: Edward Horst, Hazardous and Radioactive Materials Bureau  
: Barbara Hoditschek, Hazardous and Radioactive Materials Bureau  
: James Harris, EPA Region 6  
: Larry Brnicky, EPA Region 6  
: Randy Merker, NMED Ground Water Section