



BRUCE KING  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850

ENTERED

JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
DEPUTY SECRETARY

December 4, 1992

James W. Conyers, Jr.,  
Acting Director of Installation Support  
Department of the Army  
Headquarters, U.S. Army Air Defense Artillery  
Center and Fort Bliss  
Fort Bliss, Texas 79916-0058

**RE: Voluntary Corrective Actions for New Mexico Solid Waste  
Management Units**

Dear Mr. Conyers:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) received a copy of the RCRA Facility Investigation Report, New Mexico Solid Waste Management Units, Fort Bliss, El Paso, Texas, dated September 1991 and a copy of the Preliminary Draft Corrective Measures Study for Solid Waste Management Unit No. 25B, Fort Bliss, El Paso, Texas, dated June 1992. These documents describe voluntary corrective actions initiated by Fort Bliss for Solid Waste Management Units (SWMUs) in New Mexico.

This letter describes our permit process and how that process relates to the voluntary corrective actions that Fort Bliss is currently conducting, or any others that are being planned, for New Mexico SWMUs. The HRMB considers all corrective actions for New Mexico SWMUs at Fort Bliss as voluntary corrective actions because such actions are being conducted at the facility's own initiative and outside of permit requirements. That is, the NMED and the Environmental Protection Agency (EPA) have not issued a full RCRA permit to require corrective actions for the New Mexico SWMUs at Fort Bliss.

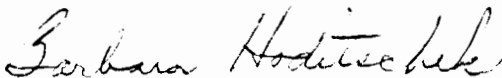
A full RCRA permit for the New Mexico portion of the Fort Bliss facility will contain two parts, jointly issued by the NMED and the EPA. The NMED part of the permit will be issued under the authorized State Permit Program and will cover hazardous waste management activities for the interim status Open Burning/Open Detonation (OB/OD) unit located in New Mexico. The HRMB has a copy of your OB/OD Part B permit application on file dated November 2, 1988. Fort Bliss should keep the information in the Part B application up to date, particularly if waste management operations have significantly changed since the application was submitted to the State.

The EPA part of the full RCRA permit will be issued under the authority of the Hazardous and Solid Waste Amendments of 1984 (HSWA). This part of the permit will cover any corrective actions necessary for New Mexico SWMUs at Fort Bliss. EPA will be responsible for issuing and enforcing the HSWA portion of the permit until the NMED receives additional authorization from EPA to manage that part of the RCRA Permit Program. EPA and NMED have not yet scheduled a time period for developing a draft permit for the Fort Bliss facility in New Mexico.

We appreciate you sending us copies of the voluntary corrective actions for New Mexico SWMUs at Fort Bliss. However, the HRMB's current work load prevents our review or approval of any of your voluntary corrective actions. EPA and NMED will review all voluntary corrective actions that have been completed by Fort Bliss and evaluate your facility's compliance with corrective action requirements at the time we are developing a draft permit. It is important to note that the HSWA portion of the permit, when issued, may require Fort Bliss to conduct investigations and studies beyond the scope of the voluntary corrective actions currently in progress for New Mexico SWMUs.

Please contact Marc Sides of my staff at (505) 827-4308 if you have any questions.

Sincerely yours,



Barbara Hoditschek, Permit Program Manager  
Hazardous and Radioactive Materials Bureau

cc: B. Hoditschek, HRMB  
S. Alexander, HRMB  
E. Horst, HRMB  
T. Tatkin, HRMB  
D. Neleigh, US EPA, Region 6, (6H-PN)  
J. Pfeil, DSMOA Program, GWPRB  
D. Morgan, DSMOA Program, GWPRB