



# United States Department of the Interior

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## BUREAU OF LAND MANAGEMENT

Las Cruces District Office  
1800 Marquess St.  
Las Cruces, New Mexico 88005

IN REPLY REFER TO:

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5420

OCT 14 1994

Mr. Cornelius Amindyas  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
525 Camino de los Marquez, Suite 4  
Santa Fe, NM 87502



Dear Mr. Amindyas:

Thank you for providing us with information on the Open Burn/Open Detonation (OB/OD) permit (EPA I.D. NM4213720101-01) for Fort Bliss. We have reviewed the permit and have the following comments.

1. Fort Bliss and the Bureau of Land Management (BLM) are co-administrators on the land on which the OB/OD site is located. The site is located in an area known as McGregor Range, most of which is Federal land that has been withdrawn for use by the Secretary of the Army. If the Army should ever decide that McGregor Range is no longer necessary for military purposes, the land would revert to public land managed by the U.S. Department of the Interior, Bureau of Land Management. Public Law 99-606 would require Fort Bliss to decontaminate any land that reverts back to the BLM. The BLM, as a co-administrator of the land on which the OB/OD site is located, has a continuing interest in the permit for that site.
2. If the site is to be used until the year 2090 as proposed, there will have been 125 years (1965 to 2090) of potential accumulation of metals (e.g., from lead sulfocyanate as listed in Table A-2) in the soil within and surrounding the site. The proposed soil sampling within and near the perimeter of the site should identify any metal contamination. However, except for the three background samples as shown on Figure J-4, no sampling is proposed for the area surrounding the site. Potentially, metals could accumulate in the soil within several hundred feet of the site. We suggest this area be characterized now by sampling the soils or perhaps utilizing XRF techniques to screen the area. The sampling plan should then be revised to include periodic sampling (or XRF screening) of the soil surrounding the actual OB/OD site.
3. Although contamination of ground water appears to be unlikely now, there needs to be better documentation of site-specific geologic and hydrogeologic conditions in order to evaluate future effects on the ground water pathway. What is the potential for OB/OD contaminants to migrate to the saturated zone? Are the contaminants more likely to remain within the soil matrix or could certain compounds leach downward through the vadose zone? By the year 2090, population growth and northeastward expansion in the El Paso area will require more municipal water wells. What effect

will increased pumping have on aquifers in the vicinity of the OB/OD site?  
Could drawdown result in ground water flowing from the site toward the  
municipal wells?

Thank you for the opportunity to comment on this permit.

Sincerely,

*Tim L. Sanders*

*For* Timothy M. Murphy  
Area Manager  
Caballo Resource Area

cc:  
✓ LTC Lund  
Directorate of Environment (Dr. Hartman)