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May 15, 1995

CDR, USAADACENFB
Directorate of Environment
Attn: ATZC-DOE-M (Dr. Hartman)
Fort Bliss, Texas 79916-6816

Dear Dr. Hartman:

This letter serves to inform Fort Bliss of the policy of the New Mexico Environment Department (NMED) in regard to soil and groundwater concerns at Fort Bliss. These concerns are pertinent to those facilities which may impact soil and groundwater in the Tularosa Basin.

NMED has previously taken the position in a November 2, 1992 letter from the Underground Storage Tank (UST) Bureau to Holloman Air Force Base that a basewide soil cleanup standard of 1000 parts per million (ppm) of Total Petroleum Hydrocarbons (TPH) is allowable at UST sites involving release of petroleum hydrocarbons. For purposes of consistency at NMED regulated facilities, this requirement at UST sites also pertains to Fort Bliss. The 1000 ppm TPH standard is also a solid waste land disposal standard (New Mexico Solid Waste Management Regulations, EIB/SWMR-4, Section 708). This TPH standard is acceptable to NMED provided that there are no RCRA hazardous constituents present in soils for which calculated risk-based levels would be more stringent. Sufficient confirmatory analyses must be performed at each site to ensure that hazardous constituent concentrations are not exceeded in soils containing no more than 1000 parts per million TPH.

Remediation of existing contamination in unprotected groundwater will not be required by NMED at Fort Bliss, unless a situation occurs in which a human or ecological receptor is or may be exposed to unacceptable risk from contact with the contaminated water. NMED agrees that, in cases where the Total Dissolved Solid (TDS) content renders the water non-potable, direct ingestion of the water by humans is not a plausible exposure scenario. However, additional or continued contamination of the groundwater is not and will not be acceptable to NMED. To implement this policy, existing

soil and groundwater contaminant plumes must be adequately characterized. Monitoring wells defining contaminant plumes must be sampled at least annually for the contaminants present to determine if a release has occurred and the source of any release. If contaminants at any point in a plume increase in concentration, or if additional contaminants are discovered, further investigation may be required to locate and remove the source. Additionally, NMED will insist on remediation of any groundwater contamination resulting from current or future activities at Fort Bliss.

Sincerely,

Ed Kelley

Ed Kelley, Ph.D., Director
Water and Waste Management Division

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cc: Benito Garcia, Chief, HRMB
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Ronald Kern, HRMB
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