

7/3/96

FORT BLISS RFI WORKPLAN:
FORT BLISS RESPONSE TO NMED DRAFT REVIEW COMMENTS

Comment No.	Summary of NMED Comment	Fort Bliss Response to NMED Comment	NMED Concurrence (Y/N)
1	Provide format for presentation of sampling results per HSWA Module V.3.g.2	Fort Bliss (FTBL) will develop a format for presenting the results of the laboratory analysis of samples that will facilitate comparing these results with various regulatory standards, action levels, background levels, etc., including the USEPA Region 03 RBCs. This format and a list of references for standards will be included in the revised RFI Workplan (WP).	
2	Use current NM groundwater regulations in WP Section 3	The revised WP will reference NM Water Quality Control Commission Regulations as amended through 10/27/95.	
3	Provide baseline risk analysis for sites where EPA Region 03 RBC numbers are exceeded	FTBL will incorporate into the WP a program for production of a baseline risk assessment at all sites where the EPA Region 03 RBC action levels are exceeded. Language will be added specifying that the NMED be contacted immediately if there is an "imminent and substantial danger to human health or the environment" posed by contamination at any of the nine sites.	
4	Evaluate ecological receptors for risk estimations	FTBL concurs with this comment. The text in the section of each site workplan that discusses potential receptors will be expanded to elaborate on the items detailed in the NMED comment and in Section V.3.e.5 of the HSWA permit. Migratory bird populations will be evaluated with respect to reported pesticide contamination at SWMU25B	
5	Risk assessments must use EPA default parameters for residential exposure	FTBL will take a phased approach to risk assessment at sites where such a measure is required. The first phase will consist of a qualitative assessment. This would include an evaluation of the type, amount, physical and chemical state, toxicology and bio-availability of all contaminants present at the site. The potential migration pathways will be identified and assessed. Potential human exposures will be addressed. Based on the results of the qualitative assessment, the need for quantitative data may be determined. In conjunction with the response to comment #6 below, the decision criteria for evaluation of quantitative data may be selected following	

<i>Comment No.</i>	<i>Summary of NMED Comment</i>	<i>Fort Bliss Response to NMED Comment</i>	<i>NMED Concurrence (Y/N)</i>
		completion of the quantitative study.	
6	Concerns potential future land uses and cleanup standards	FTBL agrees that a deed restriction, or some other land use restriction, may be necessary at some sites. We believe that it would be more appropriate for these issues to be addressed in the Corrective Measures Study which will follow the RFI.	
7	Identify SWMU coordinates and place permanent markers at SWMU sites	The WP will be revised to include a description of the survey plan which will tie the individual site surveys to the current North American Datum (NAD). Brass tabs affixed to concrete monuments will be constructed at each SWMU.	
8	Requires remote QA/QC background sampling locations for each of the three posts.	The WP will be revised accordingly. Background data for all McGregor Range sites will be obtained from the existing background data related to the McGregor Open Detonation Treatment unit. One remote boring at each of the Dona Ana and Orogrande Range Camps will be added to provide background data for soil borings at SWMU sites in the vicinity of those two locations.	
9	Include test for explosive materials and residues in all media samples at all landfill and OD sites	FTBL does <u>not</u> propose to sample media for explosives at the landfill sites. There is no indication in the March, 1989, RCRA Facility Assessment that there are any explosive materials deposited in any of the landfills. FTBL will test all samples taken at SWMU #20 for explosive materials since this was an open detonation area.	
10	Include evaluation of landfill caps per NM Solid Waste Management Regulations (EIB/SWMR-4). Evaluate erosion potential at landfills.	FTBL will revise the WP to include evaluating the caps at all four landfill sites in terms of the requirements of (EIB/SWMR-4). The relevant portions of the SWMR will be included in the Appendices. Erosion potential will be evaluated.	
11	Provide separate letter describing current solid waste disposal practices at NM posts.	FTBL will provide a letter describing current solid waste disposal practices at NM posts.	
12	Any changes to approved WP activities during the course of the investigation should be coordinated with the NMED	FTBL will revise the WP to specifically address coordinating with the NMED any proposed changes to the approved Workplan activities that may required during the course of the investigation.	
13	Concerns sampling procedures for VOCs	The table being developed in response to comment #17 will clarify which particular sampling methods will be employed for particular types of media and the related laboratory analyses. Composite surface soil samples will not be submitted to the laboratory for VOC	

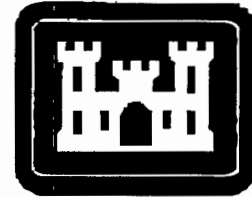
<i>Comment No.</i>	<i>Summary of NMED Comment</i>	<i>Fort Bliss Response to NMED Comment</i>	<i>NMED Concurrence (Y/N)</i>
		analysis. Should VOC contamination of surface soils be suspected during the course of the investigation, then a grab sample will be taken and submitted to the laboratory for VOC analysis.	
14	Include "extensive" soil vapor surveys at all landfill sites.	A program for soil gas sampling at each of the four landfills has been developed by FTBL. The WP is being revised to include from ten to fifteen soil gas sampling points at each landfill site. FTBL proposes to use an active gas extraction method based on ASTM Standard D 5314 - 92.	
15	Requires revision of boring program at landfill sites.	The soil boring program at the four landfills will be revised by FTBL to include siting the perimeter vertical borings as close as possible to the waste trenches without penetrating the waste mass. In addition, vertical borings will be sited between trenches, where applicable, within the interior of the trench zone. Angle borings to beneath the waste mass will be added to the boring program. The results of the exploratory geophysical program and the soil gas sampling program will be utilized to optimize siting of the soil borings.	
16	Elaborate on program to define landfill boundaries.	FTBL will expand and clarify the WP discussion of the geophysical mapping program.	
17	Identify EPA SW-846 methods to be used per HSWA Section N.1.b.3.	A table is being developed for inclusion into the Data Collection section of the WP that will identify SW-846 methods to be used for each laboratory analysis.	
18	Provide "conclusive evidence" of groundwater depth and quality below each of the three posts.	The WP will be revised to specifically discuss the use of the most current USGS data on existing wells in the vicinity of the three range camps to establish groundwater depth and quality (TDS).	
19	States that the facility (FB) is responsible for worker safety and health per 29 CFR 1910.120.	WP will incorporate a note to this effect.	
SWMU 18	Elaborate on the "regulatory requirements for groundwater analytes" listed on page 6-16.	The existing text is a misstatement. The referenced analytes, TOC, TPH, and SVOCs) will be redefined as indicator parameters of contamination in the revised WP.	
SWMU 19	Elaborate on decision criteria to determine screened interval of monitoring wells.	FTBL will revise the WP to elaborate on the decision criteria to be used to determine the screened interval for monitoring wells. The	

<i>Comment No.</i>	<i>Summary of NMED Comment</i>	<i>Fort Bliss Response to NMED Comment</i>	<i>NMED Concurrence (Y/N)</i>
	Clarify phased approach to contaminant characterization as noted on page 6-39.	text will be included in Section 3.3.4 in the discussion on monitoring well installation and will be consistent with the construction requirements of EIB/SWMR-4. The discussion on page 6-39 concerning the phased approach to contaminant characterization will be clarified and expanded.	
SWMU 20	Modify constituents to be analyzed to reflect plan for active McGregor Range OD. Elaborate on possible presence of "kick-out" of explosive debris. Include analyzing contents of waste drums. Discuss possible petroleum hydrocarbon contamination.	FTBL will revise the WP to include a discussion of "kick-out" and several more surface soil sampling points at this site in order to increase the probability of intercepting existing soil contamination related to "kick-out" of explosive debris. The sampling plan for this site will be revised to incorporate laboratory analyses for the same constituents that are identified with the McGregor Range Open Detonation Area. The abandoned metal drums will be examined and samples of any contents will be submitted for laboratory analyses. Analyses of samples for petroleum hydrocarbon contamination will be included in the sampling plan.	
SWMU 25	Elaborate on tar material noted at site.	FTBL will revise the WP discussion on this item accordingly.	
SWMU 25B	Determine whether contamination exists at sludge drying beds, including nature and extent of any contamination. Address ecological risks.	FTBL will revise the WP to include an investigation of possible contamination at the sludge drying beds at this site. A strategy to evaluate the ecological risks associated with this site, as stated in the NMED comment, will be specifically addressed in the revised WP.	
	Develop on-going monitoring plan for influent and releases per HSWA Section B.6.	FTBL proposes to address this matter as an issue separate from the RFI. FTBL will draft a proposal to monitor influent and releases at this SWMU for NMED review.	
SWMU 27	Develop complete regional groundwater monitoring well network.	FTBL believes that the need for a regional groundwater monitoring network can best be assessed following completion of the RFI.	
SWMU 27B	(See SWMU 27, above)	(See SWMU 27, above)	
SWMU 29	Provide statistical justification for number of soil borings, or increase borings, or otherwise address concerns that number of borings is insufficient to cover five acre area.	The initial number of soil borings proposed for this site, four, is arbitrary in nature given that very little is known of the number and areal extent of waste trenches at this site. Due to this fact, no attempt was even made to provide for preliminary siting of the boreholes at this SWMU. FTBL will revise the WP discussion of this site to clarify that geophysics will be employed to determine the location	

<i>Comment No.</i>	<i>Summary of NMED Comment</i>	<i>Fort Bliss Response to NMED Comment</i>	<i>NMED Concurrence (Y/N)</i>
		<p>and extent of waste units at this site. Although the initial area to be explored may be large, the actual area occupied by waste trenches may be small. The actual number, type and location of soil borings to be employed at this site will not be determined until the results of the geophysical investigation, soil gas sampling program and trenching procedure are evaluated. As per NMED comment #12, definitive plans for soil boring at this site will be coordinated with the NMED prior to the commencement of drilling activity. (See SWMU 27, above, with regard to groundwater monitoring.</p>	
SWMU 76	(See general comments)	(No response required)	



U.S. ARMY CORPS OF ENGINEERS
Fort Worth District Military Branch
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FACSIMILE TRANSMITTAL HEADER SHEET

FROM: HENRY KASTEN CESWF-ED-MR (817) 334-2762
CESWF-ED-M FAX (817) 334-3348 OR 4341
MESSAGE CENTER FAX (817) 334-4516; ALT FAX 334-4547
4516 SHOULD BE USED FOR LONG MESSAGES BUT IS NOT AVAILABLE
FOR WEEKEND PICKUP.

TO: JIM THOMPSON (713) 956-4100
FAX (713) 462-6550
PLEASE NOTIFY ABOVE RECIPIENT UPON RECEIPT

SUBJECT: FORT BLISS SWMU

THIS SHEET + 2 PAGES DATE: 11 June 1996

COMMENTS:

**DIRECTORATE OF ENVIRONMENT
MULTIMEDIA COMPLIANCE DIVISION**

FAX: (915) 568-1333

TELEPHONE: (915) 568-8185/568-1041

NUMBER OF COPIES (including header) 2

FROM: Jim Stefanov **PHONE:** 915-568-4979

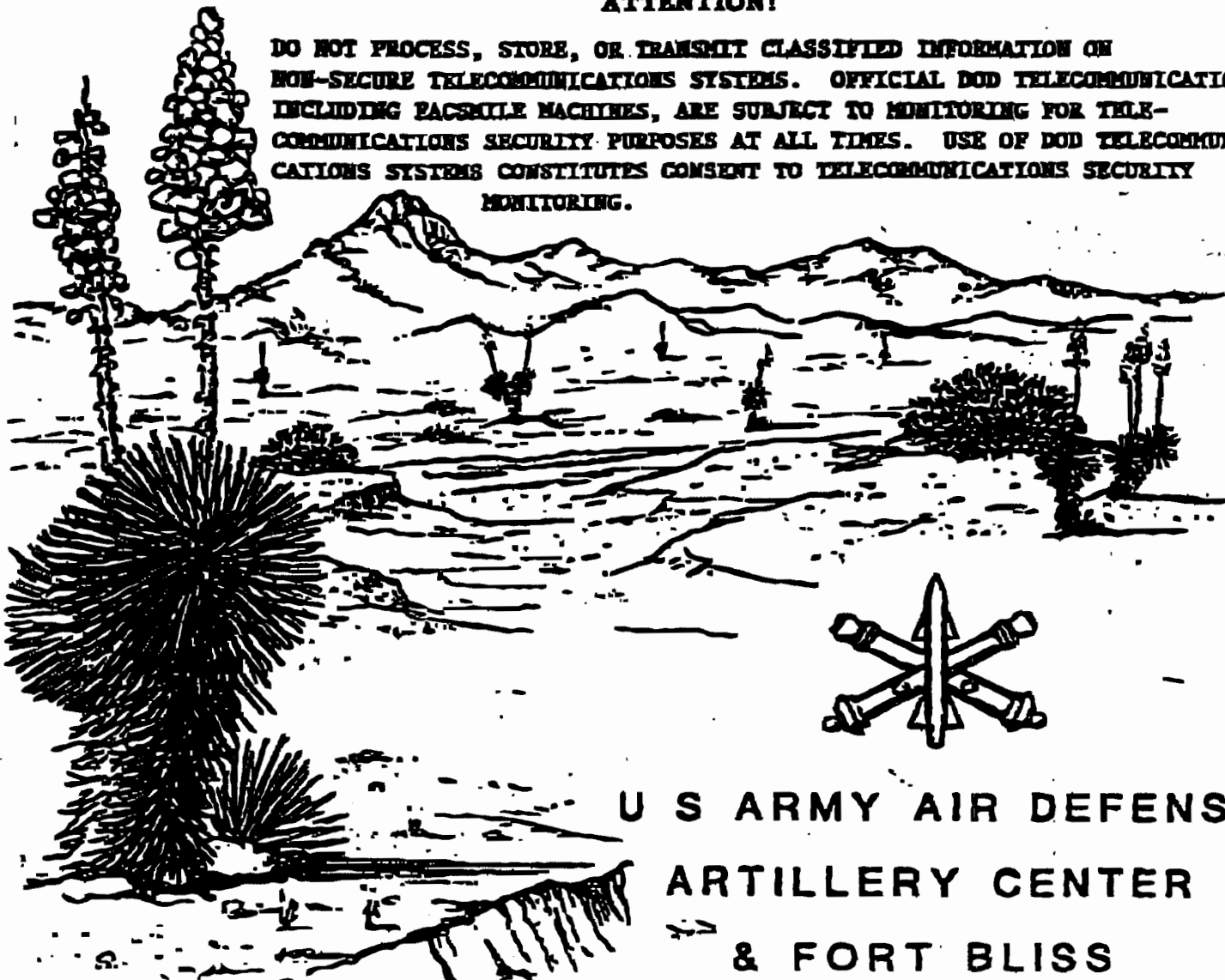
TO: Henry Kasdin

FAX: 817-334-3348

COMMENTS: Henry: Please have Thompson start revisions to the RFE Work Plan asap. On the attached page I've listed the ~~attached~~ NMED review draft comments that should be safe to work on. Thanks, Jim

ATTENTION!

DO NOT PROCESS, STORE, OR TRANSMIT CLASSIFIED INFORMATION ON NON-SECURE TELECOMMUNICATIONS SYSTEMS. OFFICIAL DOD TELECOMMUNICATIONS, INCLUDING FACSIMILE MACHINES, ARE SUBJECT TO MONITORING FOR TELECOMMUNICATIONS SECURITY PURPOSES AT ALL TIMES. USE OF DOD TELECOMMUNICATIONS SYSTEMS CONSTITUTES CONSENT TO TELECOMMUNICATIONS SECURITY MONITORING.



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Ft. Bliss RFI's.

NMED Review Comments safe to work on:

Comment #

- 1
- 2
- 07
- 8
- 9
- 10
- 12
- 13
- 14 (please coordinate w/me)
- 15 (" " ")
- 16
- 17
- 19
- SWMU 18
- SWMU 19
- SWMU 20
- SWMU 25
- SWMU 25B

**DIRECTORATE OF ENVIRONMENT
MULTIMEDIA COMPLIANCE DIVISION**

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NUMBER OF COPIES (including header) 6

FROM: Jim Stefanov IPHONE: 915-568-4979

**TO: John Laser
Thompson Professional Group**

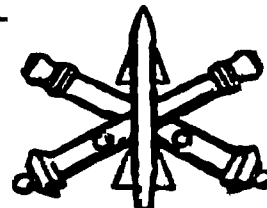
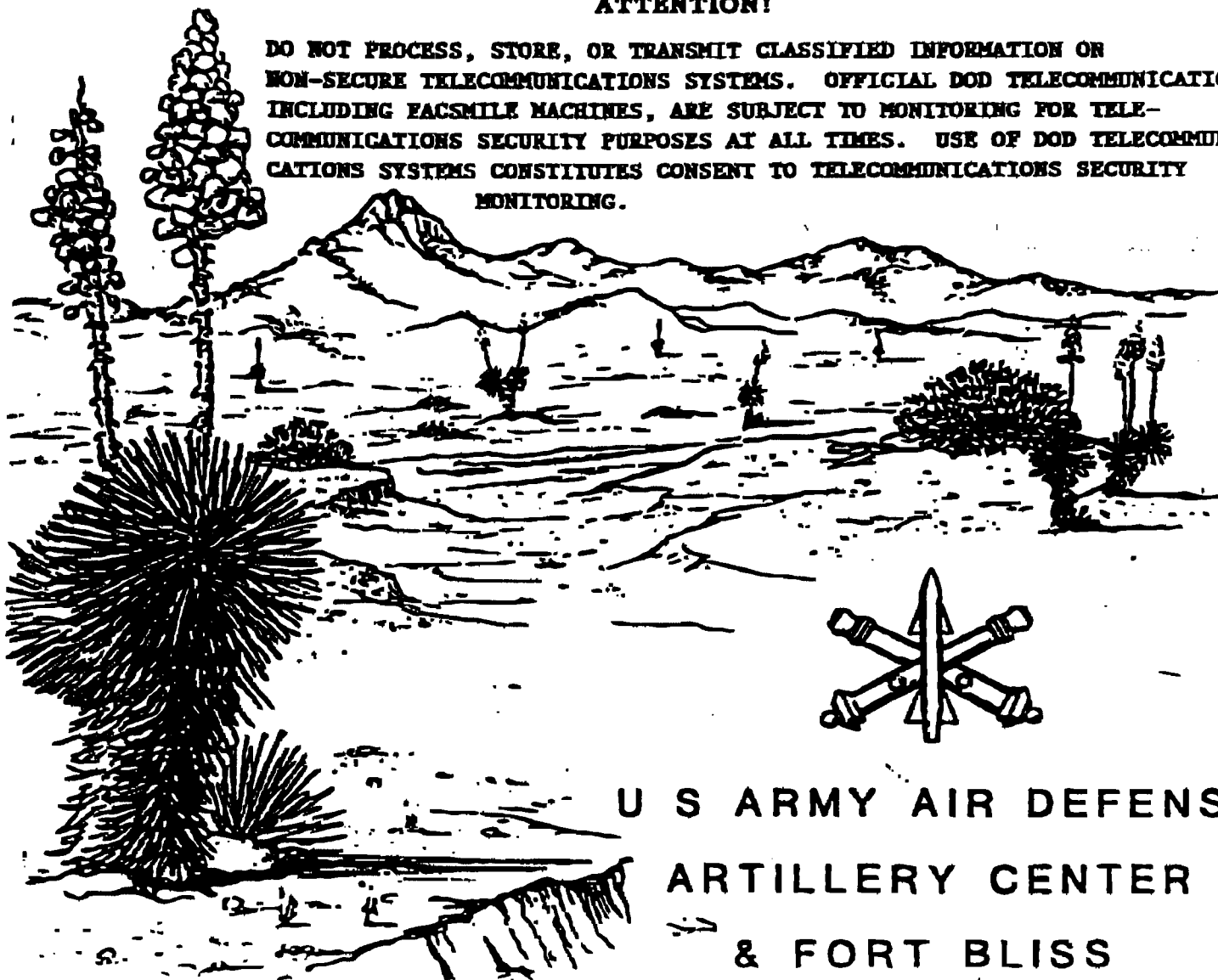
FAX: 713-956-4121

COMMENTS: John, Draft NMED comments. I'm in all week, so call if you have any questions.

Regards, Jim

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Attachment

DRAFT

Response to the Fort Bliss (FB) RCRA Facility
Investigation (RFI) Workplan (WP) dated February 1996

LIST OF DEFICIENCIES

General Deficiencies:

1. The New Mexico Environment Department (NMED) requires that FB abide by the HSWA permit Data Management Plan, Section V.3.g.2, requirement of a presentation in the RFI WP of the format the RFI report will use to present data and conclusions. Regulatory review and response to the RFI report will be expedited if FB will present all exceedances of the following comparative levels in the order mentioned.

First - regulatory standards, federal or state (maximum contaminant levels (MCLs) or New Mexico (NM) state groundwater standards)

Second - action levels (NMED recognizes the Environmental Protection Agency (EPA) Region 3 risk based concentration (RBC) numbers for the yearly quarter previous to the date on the report)

Third - background concentrations

Fourth - any detection above the method detection limit (MDL)

Fifth - any tentatively identified compounds (TICs)

2. New Mexico has more up-to-date groundwater regulations than those mentioned in Section 3. The WP must reference the New Mexico Water Quality Control Commission Regulations as amended through October 27, 1995. A copy of these regulation will be provided upon request.

3. FB must provide a baseline risk analysis in the associated RFI Report for any sites where action levels (EPA Region 3 RBC numbers) are exceeded. If during the course of this investigation FB determines that there is a imminent and substantial danger to human health or the environment, NMED must be notified at once.

4. In identifying receptor populations for risk estimations, FB must evaluate for ecological receptors, particularly endangered or threatened species, as required by Section V.3.e.5 of FB's HSWA permit. Please evaluate the migratory bird populations using the oxidation lagoons in light of the presence of pesticides at Oregrande.

DRAFT

FB RFI WP
Page 2

5. Risk assessments performed at FB must be evaluated using the standard EPA default parameters for a residential exposure scenario until an alternate future land use has been approved by the appropriate stakeholders.

As land owners, the Bureau of Land Management (BLM) and White Sands Missile Range (WSMR) are principle stakeholders at particular SWMUs and must be involved, at their option, in the future land use determination.

6. As a stakeholder, NMED generally considers current land use a reasonable estimate of future land use. However, NMED recognizes that land transfers may occur in the future that would cause the exposure scenario for the property to be more extensive (e.g. industrial to residential) and thus require a more conservative cleanup standard. In consideration of this possibility and to ensure that the environmental risks associated with a property are not forgotten, Fort Bliss must either provide for a deed restriction or some other equivalent land use restriction to be entered with the appropriate authority or, preferably, show that it has a mechanism in place to readdress risk and, if necessary, to clean up the site to more stringent standards in the future.

7. NMED is concerned that SWMU locations will be lost with time. This appears to have almost happened at the McGregor OD Area, SWMU 20. FB must accurately identify SWMU coordinates and place permanent markers at all locations that are apt to return to native vegetation.

8. In general the quality assurance/quality control (QA/QC) of determining soil background concentrations outlined in this WP is inadequate. NMED may consider any constituent concentrations measured reasonably near a SWMU attributable to that SWMU.

NMED would accept a proposal from FB to select a single, remote background location at each of the three (3) NM posts. FB should also analyze samples from all distinct soil types at each location. FB may propose to use the background determinations for the McGregor Open Detonation Treatment unit for the other McGregor SWMUs.

9. FB must include a test for explosive materials and residues in all environmental media samples at landfill and OD sites.

10. Regarding closure of landfills, FB must at a minimum abide by the capping requirements of the NM Solid Waste Management Regulations (BIB/SWMMR-4). Please evaluate in the RFI report the soil caps currently covering the landfills in light of these regulations. Please also evaluate the erosion potential of the landfill, particularly the Orogrande Sanitary Landfill reported to be near an arroyo.

DRAFT

FB RFI WP
Page 3

11. FB must provide a separate letter describing how solid wastes are currently being handled at the NM posts.

12. FB does not commit in the WF to contacting the Administrative Authority (AA), NMED, about changes made during the investigation to work prescribed in a regulatorily approved work plan. FB must be aware that if work proceeds contrary to the approved WF, FB will be at risk of noncompliance with the HSWA permit (see Standard Conditions, Section B.8).

13. Composite sample results will not be accepted by the AA if they are to be analyzed for volatile organic compounds or, the method detection level (MDL) is too high to compare to the appropriate action level divided by the number of samples composited.

14. Soil vapor surveys are common investigative techniques at landfill sites but have not been proposed by FB for this RFI. Due to the possible presence of volatile constituents in the four (4) landfills, and the fact that these volatiles are generally mobile, NMED will not consider a complete effort has been made to determine whether a release has occurred at the landfill sites without an extensive soil vapor survey.

15. NMED believes that the planned vertical boreholes at the landfills will be insufficient to determine contaminant migration, particularly if the borings will be twenty five (25) feet from trench boundaries. FB must propose a more definitive plan at these sites.

16. Please elaborate in this work plan on what efforts will be made to define the boundaries of the landfills. Based on a conversation with Colonel Lund, FB Range Commander, on October 13, 1994, there are three (3) cells at Dona Ana, not the two (2) mentioned in this work plan.

17. FB must identify the EPA SW-846 analytical methods it proposes to use as required by Section N.1.b.3.

18. FB suggest that groundwater is generally three hundred (300) feet below ground level and has little potential to be impacted by contaminant migration. The RFI report must at a minimum supply conclusive evidence of both groundwater depth and quality below each of the three (3) NM posts.

19. NMED acknowledges the receipt of the permit required worker health and safety documentation. However, it is the facility's responsibility to maintain working conditions that insure worker health and safety pursuant to 29 CFR, Section 1910.120. Therefore, liability for operation relating to worker health and safety remain with your facility.

DRAFT

FB RFI WP
Page 4

Site Specific Deficiencies:

SWMU 18, McGregor Rubble Pit/Landfill

Please elaborate on the regulatory requirements for groundwater analytes listed on page 6-16 (TOC, TPH and SVOCs). The regulatory agency at the NMED responsible for approving this work plan, the Hazardous and Radioactive Materials Bureau (HRMB), is not aware of this list.

SWMU 19, McGregor Range Oxidation Pond

Please elaborate in Section 6 on the decision criteria that will be used to determine the screened interval of the monitoring wells.

Please clarify the phased approach to contaminant characterization described on page 6-39.

SWMU 20, McGregor Range Open Detonation Area (inactive)

NMED requires that the same constituents analyzed for at the active McGregor Range Open Detonation Area be analyzed for at this SWMU.

FB must elaborate on the possible presence of "kick out" of explosive debris from this unit. Without a thorough understanding of all possible risks at this site, NMED will not consider that nature and extent of contamination has been determined, nor will it sanction removal of this SWMU from FB's permit.

FB must justify why it is not proposing to analyze the contents of the drums?

NMED believes that petroleum hydrocarbons were often used at detonation areas to initiate the destruction process. Please include this as a possibility in the WP or explain why not.

SWMU 25, Orogrande Range Rubble Pit/Landfill

Please elaborate on the tar material west of the trenches and how the nature of this material is known.

SWMU 25 B, Orogrande Range Oxidation Pond

A complete investigation of this SWMU necessitates a determination of whether contamination exists at the sludge drying beds and, if so, what the nature and extent of that contamination is.

For future reference, based upon preliminary data, NMED will not be able to concur with a recommendation of no-further-action, nor

DRAFT

FB RFI WP
Page 3

be able to remove this SWMU from FB's HSWA permit without a commitment to further monitor influent and releases to assure that hazardous constituents are not being released. Please refer to the "Specific Waste Ban", Section B.6., of FB's HSWA permit.

The ecological risks are of particular concern at this site due to its being an isolated water source with measured levels of pesticides. Please address this issue.

SWMU 27, Dona Ana Rubble Pit/Landfill

Principally due to the proximity to a potable aquifer and the difficulty of investigating landfills, NMED requires a complete regional groundwater monitoring well network in association with this SWMU.

SWMU 27B, Dona Ana Range Oxidation Pond

Principally due to the proximity to a potable aquifer and the fact that the pond is not lined, NMED requires a complete regional groundwater monitoring well network in association with this SWMU.

SWMU 29, Dona Ana Range Sanitary Landfill

FB must provide statistical justification that four (4) shallow soil borings in a five (5) acre landfill is adequate to determine whether a release has occurred. Otherwise, NMED will not consider the RFI complete based on the work outlined in this plan.

NMED requires a complete regional groundwater monitoring well network in association with this SWMU.

SWMU 76, Meter Range Oxidation Pond

See general comments.



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Environmental Design Branch

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COMMAND/ OFFICE	NAME/ OFFICE SYMBOL	OFFICE PHONE NO.	FAX NO.
FROM BEVERLY POST			
Fort Worth District US Army Corps of Engineers	CESWF-ED-E	(817) 334-3221 ext 1646	(817) 334-2991
TO			
JIM THOMPSON		(713) 956-4100	(713) 956-4121

CLASSIFICATION	PRECEDENCE	NO. PAGES (Incl Header)	DATE	RELEASER'S SIGNATURE
Unclassified	Routine	6	6/12/96	

REMARKS

JIM

ATTACHED ARE THE CORP'S COMMENTS TO THE FT. BLISS WORKPLAN. HENRY SAID JIM STEFANOV SENT HIS COMMENTS TO YOU ALREADY AND WE WOULD ALL BE TALKING TOMORROW.

Review Comments by B. Post, CESWF-ED-E, 26 June 96 Final Submittal RCRA Facility Investigation Workplan for Nine Solid Waste Management Units, Fort Bliss, Texas, Contract No. DACA63-94-D-0009

GENERAL COMMENT

Overall, most of the comments for the Draft submittal were fully addressed and/or resolved; however, after further review we request that the following items be addressed.

LIST OF ACRONYMS

1. Correct acronym for Toxicity Characteristic Leaching Procedure is "TCLP".

LIST OF TABLES

2. Table 6.9-3 is on page 6-195.

LIST OF FIGURES

3. Figure 7.1-2 Change page 7-47 to 7-45
 Figure 7.1-3 Change page 7-48 to 7-46
 Figure 7.1-4 Change page 7-49 to 7-47
 Figure 7.1-5 Change page 7-50 to 7-48
 Figure 7.2.1-1 Change page 7-61 to 7-59
 Figure 7.2.1-2 Change page 7-62 to 7-60
 Figure 7.2.1-3 Change page 7-63 to 7-61
 Figure 7.2.2-1 Change page 7-73 to 7-71
 Figure 7.2.2-2 Change page 7-74 to 7-72
 Figure 7.2.2-3 Change page 7-75 to 7-73

SECTION 1

4. page 5, first complete sentence Done 6/18 JL.

Hazardous substances have been detected at SWMU 25B, not SWMU 25.

SECTION 2

5. page 2, paragraph 1.1, 5th sentence

Typo - "ordinance"

SECTION 3

6. page 1, sentence 2 of second paragraph

Please complete sentence by adding "be" between "will" and "uncertain".

7. page 20, third paragraph, second sentence

Equipment blank samples do not verify calibration, they are used to assess cross-contamination brought about by improper decontamination procedures. Please correct this sentence. Also, equipment blanks shall be collected at the rate of one per day as was stated on page 39 of Section 3. (Please see Comment 8)

8. page 39, second complete paragraph

Are the field blanks or rinsate blanks referred to in this paragraph the same as equipment blanks referred to on page 20? Please be consistent in terminology.

9. page 17, 1st complete paragraph, last sentence

Please change wording to make it more understandable. If water table is to be lowered, how will this be done?

10. page 24, 3rd paragraph, second sentence

Typo - "caring" *change to "curing"*

11. page 42

Information on Analysis Request and Chain of Custody Record should also include analytical method.

12. page 8 *to be incorporated w/NMED #1*

Even though ER 1110-1-263 is referenced and included in the Appendix 6 of the Workplan, it would be helpful to the sampling team if tables were provided listing the analytical parameter and method, number and types of samples and sample containers, preservation required, and holding times at each SWMU.

13. page 48

Replace "USCOE" with "USACE"

14. page 22, p 28-29, p 47 and all other references to Investigative Derived Wastes (IDW)

Drums containing IDW shall be dated and labeled. Also, there is a 90 day holding time for drums containing hazardous waste, therefore, an accelerated laboratory turn around time may be required to comply with regulations. Please add a statement addressing this issue. *following return of lab results*

15. page 23, Section 3.3.4

The state of New Mexico requirements shall be followed for the installation of monitoring wells. Requirements shall be investigated and referenced in the RFI Workplan and monitoring wells shall be installed and developed in accordance with these requirements.

Ref. EIB/SWMR-4

SECTION 4 no comments

SECTION 5

16. page 2, last sentence of first paragraph
typo "dependant"

17. page 4, last sentence on page

CESWF-ED-E has moved to the 4th floor so please change room number to 4C02.

SECTION 6

18. General Comment - applies to all SWMUs

Mike Describe in more detail the statistical procedures to be used in evaluating analytical data. Guidance is provided in the EPA document, "Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities", April 89, and the addendum to this document titled, "Addendum to Interim Final Guidance", July 1992.

SWMU 19 *PB89-151047*

19. typos

✓ page 31, note 15 - "NEED" NMED

page 32, 4th sentence - type "form" ← No Typo

✓ page 41, 1st complete sentence - "PH"

SWMU 20

20. page 58, Section 6.3.5, 1st sentence - delete "by"

SWMU 25

21. page 88, 2nd paragraph

Change "5 QA/QC duplicate samples" to "3 QA/QC duplicate samples"

SWMU 25B

22. typos

✓ page 99, 1st complete sentence, "form"

✓ page 102, 2nd complete sentence, "digressing"

✓ page 106, 2nd complete sentence, "PH"

23. page 95, Figure 6.5.3

As requested in previous comments, please show the break in the discharge pipe.

24. page 97, last table

What is significance of bold face type. *<None> Corrected*

SWMU 27 no comments

SWMU 27B

25. page 147 - typo, "PH"

26. page 152, 4th paragraph, 3rd sentence - *added word* complete sentence

27. page 153, table - Change 5 ea to 4 ea.

SWMU 29 no comments

SWMU 76

28. typos

- page 181, "form"
- page 188, "PH"

Review Comments by Madeline R. Morgan, Industrial Hygienist, Feb 96
 Submittal RCRA Facility Investigation Workplan for Nine Solid Waste Management Units,
 Fort Bliss, Texas, Contract No. DACA63-94-0009.

The following items from the previous comments were still not addressed:

General

Section 7 SHP & SSHP
 Confined Space Entry Procedures and Spill containment Program are not addressed in the SHP or SSHP. This is a requirement of 1910.120. If there is a corporate Confined Space Program then it still must be reference in the SHP & SSHP and who will determine when to enforce this program.

Spill Containment Procedures must be addressed in the SSHP as to who will clean up in the event of a spill, where the material will be and disposal of the material.

SHP

On page 13 of section 7 - Personal Protective Equipment - second line from bottom of page - reads: becomes available or as directed by the SSHO. Should read: becomes available and as directed by the SSHO.

SSHP's

Prior to the start of work the personnel, their roles and lines of authority shall be specific by name in each SSHP and will be amended if changes take place.

Section 7 - page 68 - Decontamination Procedures - 3 line from the end of the paragraph reads: thoroughly before eating, smoking or drinking immediately upon leaving the site. Should read thoroughly before eating, smoking or drinking and immediately



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Fort Worth District

Environmental Design Branch

FACSIMILE TRANSMITTAL HEADER SHEET

COMMAND/ OFFICE	NAME/ OFFICE SYMBOL	OFFICE PHONE NO.	FAX NO.
FROM BEVERLY POST			
Fort Worth District US Army Corps of Engineers	CESWF-ED-E	(817) 334-3221 ext 2646	(817) 334-2991
TO			
JIM THOMPSON		(713) 956-4100	(713) 956-4121

CLASSIFICATION	PRECEDENCE	NO. PAGES (Incl Header)	DATE	RELEASER'S SIGNATURE
Unclassified	Routine	5	5/1/96	

REMARKS

JIM

I SENT THE FT. BLISS RFI WORKPLAN TO THE CORPS OF ENGINEERS UXO EXPERTS FOR REVIEW. THEY SUBMITTED THE COMMENTS ON THE FOLLOWING PAGES. PLEASE HAVE YOUR UXO CONTRACTOR ADDRESS THE COMMENTS. SORRY FOR THE LATENESS OF THIS REVIEW.

ALSO, OUR FINAL REVIEW COMMENTS WILL BE SENT ALONG WITH COMMENTS FROM THE NMED, WHEN WE RECEIVE THEM. HENRY SAID THEY ARE IN THE PROCESS OF THE REVIEW NOW, SO IT MAY BE WITHIN THE NEXT WEEK OR TWO.

ORDNANCE AND EXPLOSIVES TEAM

MANDATORY CENTER OF EXPERTISE

FACSIMILE HEADER SHEET

U.S. ARMY ENGINEERING AND SUPPORT CENTER, HUNTSVILLE
(ATTN: CEHND-OE-MC)
P.O. BOX 1600
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FROM: John Sikes **PHONE:** (205) 895-1334
DATE: 4/26/96 **TIME:** 1405

TO: Beverly Post, ENV. Design Branch

FAX#: 817-334-2991

CLASS: U

PAGES: 4

REMARKS: Comments on Workplan for 9 Solid Waste
Mgmt Units. - Revised Draft.

DESIGN REVIEW COMMENTS

PROJECT OF FT BLISS RCRA FAC INVESTIGATION, 9 SOLID WASTE MGMT UNITS

- SITE DEV & GEO
- ENVIR PROT&UTIL
- ARCHITECTURAL
- STRUCTURAL
- MECHANICAL
- MFG TECHNOLOGY
- ELECTRICAL
- INST&CONTROLS
- SAFETY
- ADV TECH
- ESTIMATING
- SPECIFICATIONS
- SYSTEMS ENG
- VALUE ENG
- OTHER

REVIEW REVISED DRAFT WP/4-167

DATE 12 APR 96

TYPE

NAME D. MULNIX/895-1593 *[Signature]*

ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
1.	SECTION 1	Page 2, para 1.1, fourth sentence. "Ordnance" is misspelled (this also needs to be corrected in other portions of the document).	
2.	SECTION 3	Page 6, para 3.3.1; page 18, para 3.3.2. Drilling done in areas where ordnance may be located requires that UXO personnel conduct avoidance procedures prior to locating the site for the bore hole.	
3.	SECTION 6	SWMU 6, SWMU 20, page 62 (Waste Characterization). States that an geophysical survey using electromagnetic (EM) equipment will be conducted in the vicinity of the two detonation pit areas. Consideration should be given to using another method of surveying this area since it was noted that debris from NIKE Ajax and Hawk missiles was observed on the site. Many explosive components of these missiles are electrically initiated and susceptible to EMR.	
4.	SECTION 6	SWMU 6, SWMU 20, page 61, second paragraph. States that "an UXO team will...confirm that the concentrations of explosive constituents in the soils are not high enough to present an imminent safety hazard...Surface soils will be sampled prior to commencing any investigative activity". If the UXO teams are to conduct this sampling, the procedures should be covered in Appendix 2, UXO Team Safety and Work Information.	
5.	SECTION 6	SWMU 20, page 68, last paragraph. UXO avoidance procedures must be conducted prior to performing boring operations in this area as it is likely that explosive items will be present.	
		<p>ACTION CODES: W - WITHDRAWN A - ACCEPTED/CONCUR N - NON-CONCUR D - ACTION DEFERRED VE - VE POTENTIAL/VEP ATTACHED</p>	

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CONAGRA ATHENS

MAY 01 '96 10:56AM CESWF-ED-ETHENS

DESIGN REVIEW COMMENTS

PROJECT OF FT BLISS RCRA FAC INVESTIGATION, 9 SOLID WASTE MGMT UNITS

- SITE DEV & GEO
- ENVIR PROT&UTIL
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REVIEW REVISED DRAFT WP/4-167

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ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
6.	SECTION 6	SWMU 25, page 82, last paragraph. States that "an UXO team will examine the site to detect any buried munitions prior to intrusion into the waste trench". The procedures for this operation by the UXO team must be delineated in Appendix 2. Since this is an intrusive activity that may result in the recovery of live explosive items, the Plan must address how this will be done and what actions will be taken if live items are found (see comments in Appendix 2 below).	
7.	SECTION 6	SWMU 27, page 125, para 6.6.5, last paragraph. Again, procedures for sampling by UXO teams, and conducting the intrusive activities must be addressed in Appendix 2.	
8.	SECTION 6	SWMU 29. Again, electromagnetic equipment is planned to be used at a site where munitions susceptible to EMR may be located.	
9.	SECTION 7	Page 10, last paragraph. Mentions unexploded ordnance in passing. All personnel on this project should receive a safety briefing from UXO personnel on ordnance identification and precautions. The second sentence of this paragraph states that "extreme caution must be used when digging or drilling in these areas". No digging nor drilling should be done unless the UXO team has conducted UXO avoidance.	
10.	APPENDIX 2	Does not record precedures to be used by the UXO teams. Procedures are required for ordnance avoidance operations, sampling actions (if conducted by UXO personnel), and for intrusive activities where live ordnance may be recovered. Some of the areas that need to be addressed	

ACTION CODES: W - WITHDRAWN
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 D - ACTION DEFERRED VE - VE POTENTIAL/VEP ATTACHED

P. 2/4

CONAGRA ATHENS.

UNCLASSIFIED

DESIGN REVIEW COMMENTS

PROJECT OE FT BLISS RCRA FAC INVESTIGATION, 9 SOLID WASTE MGMT UNITS

- | | | | |
|--|---|--|--------------------------------------|
| <input type="checkbox"/> SITE DEV & GEO | <input type="checkbox"/> MECHANICAL | <input checked="" type="checkbox"/> SAFETY | <input type="checkbox"/> SYSTEMS ENG |
| <input type="checkbox"/> ENVIR PROT&UTIL | <input type="checkbox"/> MFG TECHNOLOGY | <input type="checkbox"/> ADV TECH | <input type="checkbox"/> VALUE ENG |
| <input type="checkbox"/> ARCHITECTURAL | <input type="checkbox"/> ELECTRICAL | <input type="checkbox"/> ESTIMATING | <input type="checkbox"/> OTHER |
| <input type="checkbox"/> STRUCTURAL | <input type="checkbox"/> INST&CONTROLS | <input type="checkbox"/> SPECIFICATIONS | |

REVIEW REVISED DRAFT WP/4-167

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TYPE

NAME D. MULNIX/895-1593 *DM*

ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
		are the actions to be taken if live ordnance is recovered, who will destroy it, and evacuation procedures if ordnance is located.	
11.	APPENDIX 2	The twenty-five pages in Landscape, starting with page 7, the brief Resumes of Key Persons, contributes nothing to this project.	
12.	APPENDIX 2	The Data Item Description tells what should be in a Work Plan, BUT IS NOT A Work Plan. The information in this document should be completed to provide a complete Work Plan.	
13.	APPENDIX 2	Appendix A, Safety Instructions, is outdated.	
14.	APPENDIX 2	Annex A is included twice.	
15.	APPENDIX 2	Annex B, Hazard Analysis; Activity: Perform UXO Recovery Operations. This contract does not call for UXO recovery operations. The Hazard Analysis should address UXO avoidance and intrusive activities at the waste sites. The last Activity is Perform Final UXO Disposal Actions; and, if the contractor is going to perform disposal actions, the procedures must be written in this Appendix, to include controls, notification, explosives storage/transportation, etc.	
16.	APPENDIX 2	Recommend the Draft ETL 385-1-2, Generic Scope of Work for Ordnance Avoidance Operations, be used to develop the procedures for avoidance on this project.	
		<p>ACTION CODES: W - WITHDRAWN</p> <p>A - ACCEPTED/CONCUR N - NON-CONCUR</p> <p>D - ACTION DEFERRED VE - VE POTENTIAL/VEP ATTACHED</p>	