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**THOMPSON
PROFESSIONAL
GROUP, INC.**

6110 Clarkson Lane
Houston, Texas 77055
(713) 956-4100
(713) 956-4121 Fax

Engineering
Architecture
Environmental Sciences
Surveying & Mapping

TO:	Steve Pullen	FROM:	John Laser
FAX:	(505) 827-1544	PAGES:	3
PHONE:	(505) 827-1558	DATE:	August 5, 1996
JOB NO:	867-02.03		
COMPANY:	New Mexico Environment Department		
RE:	Meeting of July 25, 1996		

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY

• **COMMENTS:**

I have prepared the attached minutes to summarize the topics discussed at the meeting held at your office on July 25 with Jim Stefanov of Fort Bliss, Henry Kasten of the USACE - Fort Worth District, Julie Jacobs of the NMED and myself.

Please let me have your comments on these minutes so that I may prepare a final report which reflects your perspective of the agreements reached at this meeting. Both Jim Stefanov and Henry Kasten have reviewed and approved the document that I am transmitting to you.

If you wish to discuss this material with me over the telephone, please call me at (713) 956-4188, ext. 27. I enjoyed meeting with you and Julie, and I hope to be able to return to your beautiful city some day when I can spend more time there.

Very truly yours,

John A. Laser

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MEETING MINUTES

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Project:	Fort Bliss RCRA	Date:	July 31, 1996
Client:	Fort Bliss/USACE-SWF	Job No.:	567-02-03
Subject:	NMED meeting of July 25	Notes By:	John A. Laser

ATTENDANCE

**Fort Bliss Directorate of the
Environment**

Jim Stefanov

USACE-SWF

Henry Kasten, PE

New Mexico Environment Department

Steve Pullen

Julie Jacobs

Thompson Professional Group, Inc.

John A. Laser

DISTRIBUTION

All Attendees

COMMENTS

This a summary of the subjects discussed at the meeting held at the New Mexico Environment Department (NMED) on July 25 to review the revised RCRA Workplan for Nine SWMUs at Fort Bliss and White Sands, NM. The meeting was chaired by Steve Pullen, RCRA Enforcement Officer, Hazardous and Radioactive Materials Bureau, NMED.

As stated by Steve Pullen, the NMED accepts the proposals contained in the "Fort Bliss Response to NMED Draft Review Comments" with the following clarifications which he expressed, and were discussed, during the course of the meeting.

The primary interest of the NMED is the protection of groundwater in the vicinity of the SWMUs, particularly in the vicinity of the Dona Ana Range Camp since the groundwater in this area is potable. Based on this objective, the regulatory standards/action levels and EPA Region 3 RBCs used to determine sample contamination exceedances will be the most stringent available and will reflect both residential and industrial exposure limits in terms of the presentation of sampling results and statistical analysis in the RFI Report. [Refers to NMED Comment No. 1]

All risk assessments developed in response to detections of contamination will utilize residential exposure limits (EPA Region 3 RBCs) in analyzing the human health hazard posed by the contaminant release. In accordance with the phased approach to the investigation, the initial ecological and human health risk assessments conducted at the time of the first phase of site investigative activities will be general and preliminary in nature. [Refers to NMED Comment Nos. 3-5]

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MEETING MINUTES

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The locations selected for background soil borings for the Orogrande and Dona Ana SWMUs do not need to be any specific distance removed from the SWMUs. Use a reasonable approach to locating these two borings and verify that these locations have no prior history that could impact their use in establishing background conditions. [Refers to NMED Comment No. 8]

Add chemical sampling for nitrate nitrogen to the sampling schedules for all four landfill sites. Nitrate nitrogen may serve as an indicator of the presence of munitions and/or explosives in the waste material. Amend sampling schedule for the four ponds to reflect sampling for total Kjeldahl nitrogen (TKN). TKN is a measure of the total organic and ammonia nitrogen present in a sample. [Refers to NMED Comment No. 9]

When researching depth-to-groundwater for existing wells in the vicinity of the three range camps, verify that the measurements made reflect static, non-pumping groundwater levels. [Refers to NMED Comment No. 18]

The criteria used to complete groundwater monitoring wells, including establishing the proper screened interval, may be based on the RCRA guidelines (presumably as reflected in the RCRA Ground-Water Monitoring Technical Enforcement Guidance Document, OSWER-9950.1. [Refers to NMED Comment on SWMU 19]

At the conclusion of this meeting, Steve Pullen stated that the Workplan, as clarified, is acceptable to the NMED and that the site investigations could begin. He indicated that, due to manpower shortages at the NMED, he could not guarantee a written approval of the Workplan for several months. Therefore, he suggested that work proceed based on his oral approval. The parties present representing Fort Bliss, the USACE and Thompson Professional Group, Inc. agreed to proceed with implementation of the Workplan.