



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us

FB04

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RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 8, 2004

Mr. Keith Landreth
USAADACENFB
Attn. ATZC-DOE (200)
1733 Pleasonton Road
Fort Bliss, TX 79916-6816

**RE: APPROVAL WITH MODIFICATIONS FOR VOLUNTARY CORRECTIVE ACTION REPORT FOR FTBL-11/SWMU-29, FTBL-12/SWMU-27, FTBL-13/SWMU-18
U.S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT BLISS
EPA ID #: NM4213720101-01
FB-02-002**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has received Fort Bliss "Voluntary Corrective Action Report; FTBL-11/SWMU-29 FTBL-12/SWMU-27 FTBL-13/SWMU-18" dated February 22, 2002. NMED has reviewed the document and hereby approves the document with modifications. The modifications are provided as an attachment to this letter. Fort Bliss must comply with requirements listed in the attachment and submit closure plans within ninety days of receipt of this letter.

NMED concurs with Fort Bliss that these solid waste management units (SWMUs) do not pose an unacceptable risk to human health and the environment. While NMED does not require Fort Bliss to revise or resubmit the report, we take this opportunity to clarify or correct certain statement or conclusions reached by Fort Bliss. For example, the report repeatedly states that

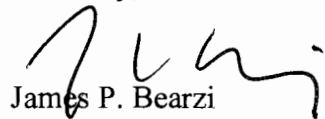
Mr. Landreth
October 8, 2004
Page 2

there was no release from these SWMUs. The analytical data clearly indicates that a release has occurred. The data also indicates that contaminant concentrations detected at the site do not pose an unacceptable risk to human health.

To demonstrate that there has not been a release, the analytical results should be compared to background values, not screening action levels. To determine the risk to human health, the sampling results should be compared to NMED residential Risk Based Screening Levels (RBSLs) in accordance with the methods described in NMED's "Technical Background Document for Development of Soil Screening Levels" (revised August 2004). Chemicals for which NMED RBSLs are not available, Environmental Protection Agency (EPA) Region VI residential screening action levels should have been used rather than EPA Region III industrial risk based concentrations that were used. NMED evaluates approval of no further action status for SWMUs based on the residential risk scenario not the industrial risk scenario that was used by Fort Bliss. Additionally, Fort Bliss has not demonstrated satisfactorily that there are no exposure pathways for ecological receptors. The report states that at present, the thickness of cover on these trenches varies from 2-6 feet which would make waste accessible to burrowing animals and plant roots. Considering the fact that there were no historical documents available that describe the nature of waste buried in the landfills, the inorganic analyses should have included metals on the target analyte list rather than the eight RCRA metals investigated by Fort Bliss.

If you have any questions, please contact Neelam Dhawan at (505) 428-2540.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:nd

Attachment

cc: J. Kieling, NMED HWB
G. von Gonten, NMED HWB
D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
P. Allen, NMED HWB ✓
L. King, EPA Region 6
D. Dodge, Fort Bliss
File: Reading File and FB 2004

ATTACHMENT
MODIFICATIONS TO THE VOLUNTARY CORRECTIVE ACTION REPORT FOR
FTBL-11/SWMU-29, FTBL-12/SWMU-27, FTBL-13/SWMU-18

1. Section 2.0, Solid Waste Management Unit-FTBL-11/SWMU-29

NMED does not concur with the Fort Bliss recommendation to close FTBL-11/SWMU-29 "as is". Fort Bliss shall install and maintain run-on controls at the site to prevent the occurrence of standing water and diminish future risk of transport of contaminants from the waste buried at the landfill. Fort Bliss must submit documentation to NMED after the completion of installation of run-on controls at SWMU-29.

2. Section 3.0, Solid Waste Management Unit-FTBL-12/SWMU-27

Fort Bliss shall submit a plan for closing SWMU-27 for NMED's review and approval. The plan shall include all the General Requirements and Closure and Post Closure Requirements for Municipal or Special Waste Landfills listed under Subsections A and B of 20.9.1.500 NMAC. An inspection and maintenance schedule shall be included with the plan. NMED will grant no further action (NFA) status for SWMU-27 after implementation and approval of the construction completion report for the landfill cover.

3. Section 4.0, Solid Waste Management Unit-FTBL-13/SWMU-18

Fort Bliss shall submit a plan for closing SWMU-18 for NMED's review and approval. The plan shall include all the General Requirements and Closure and Post Closure Requirements for Municipal or Special Waste Landfills listed under Subsections A and B of 20.9.1.500 NMAC. An inspection and maintenance schedule shall be included with the plan. NMED will grant NFA for the SWMU-18 after implementation and approval of the construction completion report for the landfill cover.