



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

5804
ENTERED



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 12, 2004

Keith Landreth
Attn: ATZC-DOE (Landreth)
Bldg. 624
1733 Pleasonton Road
Fort Bliss, New Mexico 79916-6812

**SUBJECT: ORGAN MOUNTAIN METEOROLOGICAL STATION (FTBL-081) –
SITE INVESTIGATION REPORT – FORT BLISS, NEW MEXICO
FORT BLISS, NEW MEXICO
EPA ID NO. NM4213720101-01
HWB-FB 02-001**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has reviewed Fort Bliss' *Organ Mountain Meteorological Station (FTBL-081) – Site Investigation Report – Fort Bliss, New Mexico* submitted on May 30, 2002. Fort Bliss submitted this site investigation report as a Voluntary Corrective Action Report. This report and Fort Bliss' 2001 *Site Investigation Report of the Organ Mountain Meteorological Station (FTBL-028) Site Investigation Report – Fort Bliss, New Mexico* jointly comprise a "Release Assessment" report that meets the notification requirements for a newly-identified Solid Waste Management Unit (SWMU) pursuant to 20.4.2 NMAC and Permit Condition IV.K.

NMED has determined that Fort Bliss has adequately characterized the Organ Mountain Meteorological Station (SWMU 81). NMED has also determined that the voluntary corrective actions undertaken by Fort Bliss "...as a measure of good stewardship..." were appropriate. Based on the information provided in these two reports, NMED does not require additional

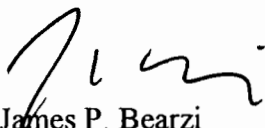
Keith Landreth
November 12, 2004
Page 2

investigation or corrective measures by Fort Bliss at SWMU 81. However, if new information or subsequent analysis indicates that there are, or are likely to be, releases from SWMU 81, NMED may require Fort Bliss to taken additional appropriate actions in the future. NMED is providing comment on several statements and conclusions made by Fort Bliss with which we do not agree (see attached comments); no response is required.

Although SWMU 81 has been listed on Fort Bliss' Annual Unit Audit (AUA) since 2000, NMED never formally made a determination to add this SWMU to Table 2 of Fort Bliss' permit. Therefore, Fort Bliss will not need to submit a formal No Further Action Petition for SWMU 81.

If you have any questions regarding this letter, please call Glenn von Gonten at (505) 428-2551.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:gvg

Attachment

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
G. von Gonten, NMED HWB
L. King, EPA Region 6 (6PD-N)
David Dodge, Fort Bliss

File: Reading File & FB 2004 File, FB 02-001

**ATTACHMENT
TECHNICAL COMMENTS**

**ORGAN MOUNTAIN METEOROLOGICAL STATION (FTBL-081) – SITE
INVESTIGATION REPORT – FORT BLISS, NEW MEXICO**

Section 2.4.1

Comment 1: Fort Bliss states that “(D)ue to the characteristics of the Station, the Industrial/Occupational Soil Screening Levels were used as the comparative values.” On January 23, 2001, NMED informed all RCRA regulated facilities in New Mexico, including Fort Bliss, that industrial risk-based screening soils for soils could not be used. NMED will not approve reports that propose the use of industrial cleanup standards until such time as statutory authority is created that allows NMED to restrict future land use.

Section 2.4.3

Comment 2 Tables 1 and 2 were not included in the copies provided to NMED. During our review, we assumed that these were Tables 1 and 2 from the 2001 report.

Section 2.4.3.2

Comment 3 Fort Bliss inappropriately dismissed the acetone and methylene chloride detections. Although these constituents are common laboratory contaminants, they were not detected in the blanks. However, as was pointed out, these two constituents were detected at concentrations less than the NMED Soil Screening Levels.

Section 3.2.3

Comment 4 Fort Bliss’ removal of 0.5 cubic yard of potentially contaminated soil did not adequately target the contaminated zone. NMED recommends that in the future at similar sites, Fort Bliss should remove soil to a greater depth over a smaller area.