



REPLY TO
ATTENTION OF:

FR 04

DEPARTMENT OF THE ARMY
HEADQUARTERS, U. S. ARMY GARRISON COMMAND
1733 PLEASANTON ROAD
FORT BLISS, TEXAS 79916-6816

ENTERED

December 8, 2004

Directorate of Environment

Mr. John Kieling, Permits Program Manager
Hazardous Waste Bureau, New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



RE: Request for 180-Day Extension to Submit Application for Renewal of HSWA Module
Permit Number NM 4213720101-01

Dear Mr. Kieling:

The Fort Bliss Hazardous Waste Facility Permit (Permit) expires on July 8, 2005. Fort Bliss requests additional time to submit the application for renewal of the HSWA Module of the Permit. Specifically, Fort Bliss requests an extension of 180 days, changing the due date for the HSWA Module application from January 8, 2005, to July 7, 2005.

Before submitting a renewal application for the HSWA Module or a Corrective Action Only Permit, whichever is appropriate, Fort Bliss would like to remove as many SWMUs as possible from Permit Table 2 (requiring corrective action) to Table 3 (not currently requiring corrective action). The following list summarizes the status of SWMUs on Table 2 and the status of SWMU 81, which was never added to Table 2:

SWMU	DESCRIPTION	STATUS
21	McGregor Fire Training Area	Undergoing permit mod to move to Table 3
22	McGregor Inactive Drum Storage	Undergoing permit mod to move to Table 3
66	McGregor Borrow Pit Drum Burial	Undergoing permit mod to move to Table 3
78	Hueco Range Camp	Undergoing permit mod to move to Table 3
81	Organ Mountain Station	VCAR reviewed; no additional measures required
18	McGregor Rubble Pit Landfill No. 13	VCAR under review by NMED
27	Dona Ana Rubble Pit Landfill No. 12	VCAR under review by NMED
29	Dona Ana Sanitary Landfill No. 11	VCAR under review by NMED
19	Active McGregor Evaporation Pond	VCAR to be submitted to NMED in Dec 2004
27B	Active Dona Ana Evaporation Pond	NFA Petition submitted Sept 2000; currently undergoing appeal regarding groundwater monitoring
76	Active Meyer Oxidation Pond	NFA Petition submitted Sept 2000; currently undergoing appeal regarding groundwater monitoring
20	McGregor Open Detonation Area	Notice of Deficiency for VCAR issued Nov 2004; Fort Bliss seeking funding to address NOD
25	Oro Grande Rubble Pit Landfill 14	RFI to NMED in July 1997; funding received 2004 for additional soil boring
26	Dona Ana Open Detonation Area	Relative Risk sampling report to NMED in 1998; Army remediation funding expected Oct 1, 2005

The remediation work on most of the SWMUs was funded under the Defense Environmental Restoration Act (DERA). However, SWMUs 25 and 26--Oro Grande Rubble Pit and Dona Ana OD Area--are not eligible for DERA funding because the two sites were active after October 17, 1986, which is the deadline for qualification as DERA sites. To continue RCRA investigation of SWMUs 25 and 26, Fort Bliss must obtain funds from the Army's new Compliance-Related Cleanup Program, which was established in 2004. The Directorate of Environment received funding in 2004 to complete additional soil borings and otherwise develop the NFA petition for SWMU 25. However, funding to further investigate SWMU 26 is not available until October 2005.

It is Fort Bliss' intent to pursue renewal of the HSWA Module or a Corrective Actions Only Permit for as few of the above-listed sites as possible. If you have any questions or comments, please do not hesitate to call Patricia McKernan at 915 568-6077.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Landreth", written in a cursive style.

Keith Landreth, Director
Directorate of Environment