

FB05



DEPARTMENT OF THE ARMY  
HEADQUARTERS, U. S. ARMY GARRISON COMMAND  
1741 MARSHALL ROAD  
FORT BLISS, TEXAS 79916-6816

REPLY TO  
ATTENTION OF:

ATZC-DOE (200-D)

MEMORANDUM FOR Mr. James Bearzi, Chief Hazardous Waste Bureau, New Mexico Environmental Department, 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico, 87505-6306

SUBJECT: Voluntary Corrective Action Report, Dona Ana Range Camp Construction Debris Removal Activities – Fort Bliss, New Mexico, Fort Bliss, EPA ID No. NM3213720101-01, HWB-FB-03-001

1. REFERENCES:

- a. NMAC 20.4.2
- b. Final Voluntary Corrective Action Report – Dona Ana Range Camp Construction Debris Removal Activities – Fort Bliss, New Mexico, dated January 2002.
- c. NMED letter, Fee Assessment Voluntary Corrective Action Report, Dona Ana Range Camp Construction Debris Removal Activities – Fort Bliss, New Mexico, Fort Bliss, EPA ID No. NM3213720101-01, HWB-FB-03-001, 21 December 2004
- d. NMED letter, Notice of Deficiency, Voluntary Corrective Action Report, Dona Ana Range Camp Construction Debris Removal Activities – Fort Bliss, New Mexico, Fort Bliss, EPA ID No. NM3213720101-01, HWB-FB-03-001
- e. RCRA Facility Assessment PR/VSI, A.T. Kearney, Inc., prepared for the US Environmental Protection Agency, Region VI, March 1989
- d. Final Report – RCRA Facility Investigation for Five Solid Waste Management Units for Ft. Bliss Texas, Thompson Professional Group, Inc. July 1997

2. PURPOSE: Fort Bliss requests the return of reference 1.b. without action.

3. RATIONAL: After expenditure of thousands of dollars, hundreds of man hours and numerous tests, Fort Bliss concluded that the site known at Dona Ana Range Camp Construction Debris Pit was not a Solid Waste Management Unit subject to the provisions of Section IV of Fort Bliss’s RCRA permit. Fort Bliss believes that the site was an illegal dumping of simple construction material from the construction of the near by New Mexico National Guard maintenance facility. As such, the material was completely removed, all proper testing

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completed, including confirmatory test of the native surrounding soils and an information copy of our report sent to your office. Therefore Fort Bliss does not believe the matter warrants further expenditure of either of our resources.

#### 4. BACKGROUND:

a. Reference 1.e., one of the earliest has this to say about SWMU 29, Dona Ana Landfill # 11: *“This unit is a 5 acre pre-WWII trench type landfill. It has not been located.”* One of the goals of reference 1.d. the Thompson RFI was to locate Landfill # 11. The Thompson report states page 4-122, Volume 1 that the contents were in part metal locker w/shelving, plastic sheeting, communication wire, metal sheeting, concrete rubble. Further this presumed Landfill # 11 was located in the vehicle maintenance yard at the southwest corner of the camp. Last the rubble pit discovered by Thompson Group was approximately 60 feet in diameter. Based upon the excavated contents of the pit, no further investigation was undertaken.

b. In 1999 a new Defense Environmental Restoration Program Project Manager was hired and determined that the pit found and reported by the Thompson Professional Group could not be Landfill # 11, SWMU 29 for the following reasons:

(1). It was too small (60’ dia. vs. 5 acres)

(2). The contents were very modern, not pre WWII.

(3). It was too close to the Range Camp. It was however very close to the relatively new New Mexico National Guard maintenance building and contained construction material that could have very likely come from that project.

c. As other reports submitted to your office have shown, the real SWMU 29, Dona Ana Range Camp Landfill # 11, was found, investigated and fenced.

4. FINAL ACTION. As part of the final work on SWMU 29, Dona Ana Landfill # 11, the rubble pit discovered by Thompson was dug up, investigated by Fort Bliss as a simple case of illegal dumping, the entire contents tested, removed to an authorized landfill in Texas, the bottom and side walls of the native soils in the pit area tested and found negative and backfilled. Nothing ever was discovered to conclude that there was ever a release of hazardous waste or constituents to the environment.

5. CONTACT: Please direct any questions concerning this site, the referenced document and the information it contains to: David Dodge, Directorate of Environment, ATTN: ATZC-DOE,

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