



FB 05

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



REPLY TO
ATTENTION OF:

ENTERED

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: Response to Notice of Deficiency RFI Work Plan for FTBL-014/SWMU-25, U.S. Army Air
Defense Artillery Center and Fort Bliss.

1. REFERENCE: NMED letter, 30 December 2004, Notice of Deficiency Workplan – Supplemental
RCRA Facility Investigation – Orogrande Landfill/SWMU-25/FTBL-14, US Army Air Defense Artillery
Center and Fort Bliss, EPA ID#: NM4213720101-01, HWB-FB-04-001.

2. BACKGROUND:

a. This letter is in response to reference 1, in regards to the New Mexico State Environmental
Department's (NMED) comments to our Workplan – Supplemental RCRA Facility Investigation –
Orogrande Landfill/SWMU-25/FTBL-14. As explained to Mr. Glenn vonGonton at the Fort Bliss
Installation Action Plan Workshop in January 2005, the Department of the Army cutoff for requesting
cleanup funding for FY 2005 was in June 2004. This NMED response and all others received this fall are
going to have to be addressed by using funding currently in the system and request for "Out of Budget
Cycle" funding which will not be considered until late summer 2005.

b. In order to comply with current fiscal restrictions for environmental liability, it will be necessary
for Fort Bliss to reach approval and agreement with the New Mexico Environmental Department on the
nature and extent of all investigative work required at this site in order to develop a solid Scope of Work
(SOW). Once the SOW (revised RFI work plan) is approved, government estimates will be developed,
cost compared to remaining funds in the current contractors contracts, if any, and appropriate fund request
submitted to the Army Environmental Center.

3. PURPOSE: Please review our response to Mr. vonGonton's comments and let us know when we and
our contractor can return to discuss your concerns in detail.

4. CONTACT: Please direct any questions concerning this document and the information it
contains to: David Dodge, Directorate of Environment, ATTN: ATZC-DOE, Bldg. 624, Taylor
at Pleasonton Road, Fort Bliss, TX 79916-6812, 915-568-7979, dodged@bliss.army.mil.

1 Encl:
Figure 1, Fort Bliss Comments

DAVID DODGE REM
Engineering & Environment, Inc.
Directorate of Environment
US Army Garrison Fort Bliss

CF: Site Files

**Report Title Supplemental RCRA Facility Investigation Orogrande Landfill, Orogrande Range Camp Fort Bliss
Report Date June 2004**

Reviewer: James P. Bearzi
Respondent: Allen Nash, Malcolm Pirnie, Inc.

1. Respondent concurs (C), Does not Concur (D), or takes Exception (E).
2. Commenter Agrees (A) with response, or Does not Agree (D) with response

Comment #	Section/ Page	Comment	C, D, E ¹	Response	A or D ²
1		Fort Bliss must submit a second copy of its proposed RCRA Facility Investigation (RFI) Workplan and two copies of its revised RFI Workplan.	C, E	Fort Bliss will submit two copies of the revised workplan.	
2		NMED is unable to read the enclosed CD-Rom. Fort Bliss must submit a revised CD-ROM without any special security provisions	C	Fort Bliss will submit a new copy of the CD-ROM report in the revised workplan.	
3		Figure 2-1 through 2-6 were not provided. Fort Bliss' revised work plan must include all Work Plan figures.	E	Figure 2-1 is the only figure required for the revised workplan. The remaining figures will not be provided. The table of contents will be changed accordingly.	
4		Attachment D was not provided Fort Bliss' revised work plan must include Attachment D.	C, E	Attachment D will be removed from the revised workplan. The table of contents will be changed accordingly. The certifications will be submitted with the final report.	
5	1.2	Section 1.2 (<i>Regulatory Framework</i>) is incorrect. After Fort Bliss has implemented its proposed RFI Work Plan, it must submit to NMED a RCRA Facility Investigation (RFI) Report, not a Voluntary Corrective Action (VCA) Report, in order to comply with its permit. After the approved RFI Work Plan has been implemented and a RFI Report submitted, NMED will review the results to determine whether Fort Bliss has adequately characterized Solid Waste Management Unit (SWMU) 25 or whether additional investigation and/or corrective measures are required. If Fort Bliss is able to demonstrate that no release has occurred, then NMED will recommend that Fort Bliss submit a No Further Action (NFA) petition. Fort Bliss must revise its RFI Work Plan to refer to the future submittal of the required RFI Report. If corrective measures are required, NMED will specify what actions Fort Bliss is required to take.	C	Fort Bliss will submit a RFI report following conclusion of the site investigation.	
6	1.3	As discussed in Comment 5, Fort Bliss must submit a RFI Report after implementing its RFI Work Plan. Fort Bliss must revise Section 1.3 appropriately.	C	Fort Bliss will revise the RFI Work Plan to indicate that a RFI Report will be submitted.	
7		NMED informed all RCRA regulated facilities in New Mexico on January 23, 2001, that industrial risk-based screening soils for soils could not be used to determine whether a threat to either human health or the environment exists. NMED will not approve work plans or	C	Fort Bliss will use residential screening levels rather than industrial-commercial screening levels.	

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		reports that propose the use of industrial or occupational cleanup standards until such time as statutory authority is created that allows NMED to restrict future land use. Fort Bliss must revise Section 1.3 and the entire RFI Work Plan to specify that it will compare all analytical results to residential standards. Fort Bliss may, at its discretion, include industrial standards comparison.			
8	2.0	Section 2.0 (<i>Site Background and Setting</i>) briefly discusses the operations at its Orogrande landfill between 1983 and 1994. Fort Bliss must revise Section 2.0 to address how solid waste was historically handled at the Orogrande Range Camp before 1983 and after 1994.	C	Fort Bliss will include a history of the landfill before 1983 and after 1994 according to available background information. The exact history of the Orogrande landfill has not been well documented.	
9	2.3	Section 2.3 (Previous Investigations) briefly discusses Fort Bliss' 1997 RFI Report on SWMU 25, but does not address data gaps. Fort Bliss must revise Section 2.3 by including a discussion on data gaps and must specifically discuss why Fort Bliss did not collect all of the samples proposed in its 1996 RFI Work Plan.	C	The revised workplan will provide a discussion of data gaps from previous investigations.	
10	2.3	Section 2.3 refers to "background" soil concentrations when summarizing its 1997 RFI Report; however, the 1997 RFI Report did not discuss the specific statistical procedures used to determine the "background".	C	The revised workplan will include a statistically robust sampling and analysis plan to establish background soil concentrations.	
11	2.3	Section 2.3 indicates that the geotechnical analysis of the "cover" demonstrates that the hydraulic conductivity values exceeded those required by the New Mexico Solid Waste Management Regulations (SWMR). In fact, only one of two soil caps meet the SWMR Standards. Fort Bliss also notes in Section 2.3, the soil cap has subsided, making the hydraulic conductivity argument irrelevant. Fort Bliss must revise Section 2.3 appropriately.	C	Fort Bliss will design a cover system for SWMU-25 based on the data presented in the RFI report.	
12	2.3	Fort Bliss must revise Section 2.3 to discuss the analytical results of the tar material samples.	E	Analytical results of the tar material are not available and cannot be incorporated into the previous investigations section. Soil samples from the tar material area will be collected and analyzed to assess the human and ecological risk associated with the tar. The tar material on the surface will be removed from the site	

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				and disposed of in a licensed facility.	
13	4.0	Section 2.3 states that there are no identifiable potential receptors. This is incorrect and contradicts information that Fort Bliss has previously submitted to NMED. SWMU 25 is located in the northern part of the Chihuahuan Desert Biotic Province and, as Fort Bliss reported in its 2002 VCA Report for SWMU 20, the fauna of desert grasslands is both "rich and diverse." Fort Bliss must revise its RFI Work Plan to include a Screening-Level Ecological Assessment (SLERA) of SWMU 25. Fort Bliss must follow NMED's current ecological risk assessment guidance when revising its RFI Work Plan.	C	A SLERA will be performed as part of the RFI.	
14	4.0	Section 4.0 (<i>RCRA Facility Investigation Activities</i>) states that ten background soil samples will be collected. Fort Bliss must revise Section 4.0 to discuss in detail how the ten background soil samples will be statistically analyzed. As discussed in Comments 18 and 22 below, Fort Bliss must also analyze the background samples for organic constituents to demonstrate that the collected samples are suitable for determining background concentrations.	C	Fort Bliss will collect and analyze at least ten samples from each verifiable soil type that is found within 100 yards of the site. Statistical analyses performed on each analyte for each data set includes (1) a normality test, (2) Mann-Whitney U test to determine the statistical means, and (3) quantile test to determine the true exceedence by an environmental sample concentration over the respective background mean concentration. Fort Bliss will analyze background samples for BTEX, TPH, PCBs, and RCRA metals.	
15	4.0	Fort Bliss must revise Section 4.0 to specify that it will compare its analytical results to residential standards for the reasons discussed in Comment 7.	C	Fort Bliss will modify the workplan accordingly.	
16	4.0	Fort Bliss must revise Section 4.0 to specify that it will submit a RFI Report, not an Investigation Summary Letter, for the reasons discussed in Comment 6.	C	Fort Bliss will submit a RFI Report, not an investigation summary letter.	
17	4.0	Fort Bliss must revise Section 4.0 to that it will conduct a SLERA, for the reasons discussed in Comment 13.	C	Fort Bliss will modify the workplan accordingly.	
18	4.0	Fort Bliss must revise Table 4-1 to reflect the requirement to demonstrate that its background samples are, in fact, suitable for use as background samples by analyzing for organic constituents and that it will conduct a SLERA.	C	See comments 13 and 14. Fort Bliss will revise the table accordingly.	
19	5.0	Fort Bliss incorrectly assumed that NMED would not review its proposed RFI Work plan. Fort bliss must revise	C	Fort Bliss will incorporate time allotted for NMED review of the revised workplan and the RFI Report, as	

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		Section 5.0 (<i>Project Schedule</i>) to allow for regulatory review and for Fort Bliss to revise its proposed RFI Work Plan. As NMED noted in its fee assessment letter of December 21, 2004, NMED conducts technical reviews of submittals in accordance with 20.4.2.200.A(7)NMAC.		well as a NMED comment review period.	
20	Attachment A, Section 2.2	Section 2.2 (Task 2 – <i>Field Investigation</i>) of Attachment A indicates that the unknown material at the “Tar Material Area” will be replaced into the trench. Fort Bliss reported in its 1997 RFI Report that the tar was approximately one inch in thickness and a few feet wide. Figure 4-4-5 of the 1997 RFI Report depicts the tar as being approximately 300 feet long and 25 feet wide (see Comment 31). Fort Bliss must revise Section 2.2 to discuss the purpose of digging a trench for material that it has reported to be approximately one inch in thickness. Fort Bliss must also revise Section 2.2 to specify how the tar material will be appropriately handled and disposed of. NMED does not consider burial of the tar material in an onsite trench to be appropriate disposal.	E	Attachment A is a contract document between Malcolm Pirnie and the USACE. It cannot be modified and will be removed in the revised workplan. Fort Bliss will revise the workplan to remove the proposed trench.	
21	Attachment A, Section 2.2	Section 2.2 of Attachment A indicates that two soil samples will be collected from the soil borings advanced adjacent to the tar material area. Fort Bliss must revise this section to specify that the two soil borings will be advanced in the middle of the tar material rather than adjacent to it.	E	Attachment A is not necessary and will be removed in the revised workplan. Fort Bliss will advance two soil borings to depth of 10 feet in the tar area.	
22	Attachment A, Section 2.2	Fort Bliss must revise Section 2.2 of Attachment A to specify that it will document that the proposed background soil samples are appropriate by analyzing for organic constituents as well as RCRA metals, as was done in the 1996 investigation. Fort Bliss must also revise this section to correctly indicate the SW-846 methods that will be used for soil analysis. Elsewhere, Fort Bliss specifies that it will analyze for RCRA metals using SW-846 Methods 6020 and 7471.	E	See response to comments 14 and 20.	
23	Attachment A, Section 2.2	Fort Bliss discusses a “No Further Action Required” decision in Section 2.3 (Task 3 – <i>Reports</i>) of Attachment A. Based on the results of the investigation, Fort Bliss may recommend a “Determination of No Further Action” in accordance with Section I.V.R of its RCRA permit 20.4.2	E	Attachment A is not necessary and will be removed in the revised work plan. Fort Bliss will submit a RFI Report.	

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		NMAC. If NMED agrees, then it will inform Fort Bliss that it should submit a No Further Action (NFA) Petition to modify its permit. As noted above, Fort Bliss must submit a RFI Report on the results of this investigation, not a "Summary Letter." The RFI Report may include a recommendation for a NFA determination. If NMED does not require additional corrective action, then Fort Bliss must submit a NFA petition for a Class I permit modification, not a RFI Report. Fort Bliss must revise Section 2.3 appropriately.			
24	Attachment A, Section 4.0	The last sentence in Section 4.0 (<i>Site Location</i>) has a typo.	E	Attachment A is not necessary and will be removed in the revised work plan.	
25	Attachment B.1, Figure 5-1	Figure 5-1 (<i>Proposed Sample Locations</i>) of Attachment B.1 is a aerial photo. Although NMED encourages the use of aerial photos, photos do not substitute for a topographic base map. Fort Bliss must revise Attachment B.1 to include a detailed site map based on either a USGS topographic quadrangle map or a professionally surveyed site map. NMED recommends that Fort Bliss also retain the aerial photos. Figure 5-1 was included twice in Attachment B.1.	C	Fort Bliss will revise the site figure in the workplan to include a USGS topographic map. Major features (humps, swales, landfill boundaries, etc) will be added to the map after in the RFI report using survey information collected during the field work.	
26	Attachment B.1, Section 4.0	The appropriate soil screening standard is residential, not industrial. Fort Bliss must revise Section 4.0 (Non-measurement Data Acquisition) to reflect this requirement.	C	Fort Bliss will revise the workplan accordingly.	
27	Attachment B.1, Section 5.1.1	Fort Bliss must revise Section 5.1.1 (<i>Soil Boring</i>) to discuss how the "expected perimeter" of SWMU 25 was determined. To demonstrate that a release has not occurred, Fort Bliss must advance the soil boring at the margin of the landfill cells. Fort Bliss cannot demonstrate that a release has not occurred by collecting samples at an indeterminate distance from the "expected perimeter".	C	The boundaries of the landfill will be trenched to physically delineate the extent of waste. The results of these activities will documented in the RFI Report.	
28	Attachment B.1, Section 5.1	Fort Bliss proposes in Section 5.1 (<i>Soil Investigation</i>) of Attachment B.1 to collect a very limited number of samples from a very limited number of soil borings and to analyze those samples for a very limited number of parameters. NMED's next three comments address deficiencies in the location of the soil borings, the number of samples to be collected, and the analyte list.	C	See comments 29 through 31. Fort Bliss will revise the RFI workplan.	

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		One of the main objectives of the investigation is to determine whether a release of hazardous waste or hazardous constituents has occurred. To demonstrate that a release has not occurred, Fort Bliss must take a sufficient number of samples from an adequate number of locations and analyze those samples for all reasonably expected constituents.			
29	Attachment B.1, Section 5.1	<p>Fort Bliss proposed to collect seven samples from five soil borings advanced to 50' bgs in its 1996 RFI Work Plan, but only collected samples from three of the soil borings. In its 1996 investigation, Fort Bliss collected one sample on the south end of the trench and two samples on the west margin of the trench but failed to collect samples from either the north or east side of the trench. By doing so, Fort Bliss failed to demonstrate that a release had not occurred on the east or north margins of SWMU 25.</p> <p>In its 2004 RFI Work plan Fort Bliss proposes to install only three soil borings around the landfill; however, Fort Bliss proposes to collect ten samples to determine background. Because Fort Bliss has not provided a site map (such as Figure 4-4-5 in its 1997 RFI Report) NMED cannot approve the proposed location of the three soil borings. At a minimum, Fort Bliss must install three additional soil borings on the east side and one additional soil boring at the north end of the trench and also one additional soil boring on the west side of the trench located equidistant between SB25-1 and SB2-5. Without a detailed site sampling location map, NMED cannot approve the proposed location of MPB-3, but does agree that the proposed depth is appropriate.</p>	C, E	<p>Fort Bliss will install a total of eight soil borings including:</p> <ul style="list-style-type: none"> — Three on east side of landfill (30 feet deep) — One on north and one on west side of landfill (30 feet deep) — One on south side of landfill (115 feet deep) — One on north end and one on south end of tar material area (10 feet deep) in the tar material area. <p>Fort Bliss will continue with "MPSB-X" nomenclature for boring identification.</p>	
29	Attachment B.1, Section 5.1	<p>Fort Bliss proposed to collect seven samples from five soil borings advanced to 50' bgs in its 1996 RFI Work Plan, but only collected samples from three of the soil borings. In its 1996 investigation, Fort Bliss collected one sample on the south end of the trench and two samples on the west margin of the trench but failed to collect samples from either the north or east side of the trench. By doing</p>	C, E	<p>Fort Bliss will install a total of eight soil borings including:</p> <ul style="list-style-type: none"> — Three on east side of landfill (30 feet deep) — One on north and one on west side of landfill (30 feet deep) — One on south side of landfill (115 feet deep) — One on north end one on south end of tar 	

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		<p>so, Fort Bliss failed to demonstrate that a release had not occurred on the east or north margins of SWMU 25.</p> <p>In its 2004 RFI Work plan Fort Bliss proposes to install only three soil borings around the landfill; however, Fort Bliss proposes to collect ten samples to determine background. Because Fort Bliss has not provided a site map (such as Figure 4-4-5 in its 1997 RFI Report) NMED cannot approve the proposed location of the three soil borings. At a minimum, Fort Bliss must install three additional soil borings on the east side and one additional soil boring at the north end of the trench and also one additional soil boring on the west side of the trench located equidistant between SB25-1 and SB2-5. Without a detailed site sampling location map, NMED cannot approve the proposed location of MPB-3, but does agree that the proposed depth is appropriate.</p>		<p>material area (10 feet deep)</p> <p>Fort Bliss will continue with "MPSR-X" nomenclature for boring identification.</p>	
30	Attachment B.1, Section 5.1	<p>Section 5.1 and Tables 5-1 and 5-2 of Attachment B.1 do not match and must be revised appropriately. Fort Bliss indicates that Table 5-1 specifies the sample depths (page 5-3); however, Table 5-1 only provides the proposed total depth for each soil boring. Section 5-1 does not actually discuss Table 5-2. The text in paragraph 1 on page 5-4 appears to indicate that the background surface soil samples will be analyzed for all the parameters in Table</p>	C, E	<p>Fort Bliss finds the number of samples and analysis requested by NMED to be unnecessary. Such extensive vertical profiling does not necessarily aid the assessment of whether a release occurred at the landfill.</p> <p>Fort Bliss will collect soil samples from the 0'-2', 13'-15', 28'-30', and 113'-115' (deep boring only) sampling intervals. Assuming a 12-foot total depth for the landfill,</p>	
		<p>5-2. However, it appears that the proposed sample depths for the three soil boring dedicated to the trench area are summarized in Table 5-2. NMED agrees with the proposed total depth of 30 feet bgs, but requires additional soil borings, more frequent sample intervals, and additional chemical analysis. Fort Bliss must revise Section 5.0 (<i>Field Activities</i>) to specify the following:</p> <ul style="list-style-type: none"> • Fort Bliss will advance a minimum of six soil borings, as specified in Comment 29; • Collections of samples from each boring at the following intervals and depths: 0'-2', 5', 10', 15', 		<p>these samples will help define the vertical extent of waste.</p> <p>Fort Bliss will collect samples from the tar area, soil borings from 0'-2' and at 10' bgs.</p> <p>Fort Bliss does not consider the known historical use of the landfill indicative of a requirement to analyze all of the soil samples for the complete suite of analytes suggested by NMED. Fort Bliss will analyze all environmental and background soil samples for BTEX, TPH-DRO, PCBs, and RCRA metals. In addition, Fort</p>	

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		<p>20', 25'; and 30' bgs;</p> <ul style="list-style-type: none"> • Chemical analysis of all samples for BTEX, TPH-DRO, SVOCs, RCRA metals, pesticides, herbicides, and PCBs. <p>NMED approves Fort Bliss' proposal to collect geotechnical from the deep boring.</p> <p>NMED cannot approve the proposed background locations until Fort Bliss provides a detailed site map, but agrees that the proposed distance from SWMU 25 is appropriate. However, as discussed above, Fort Bliss must demonstrate the proposed surface grab samples are acceptable background samples by analyzing for the same constituents as for the surface investigation soil samples.</p> <p>Fort Bliss must revise Section 5.1 to specify that it will collect and analyze at least one sample of tar material, that it will advance two soil borings through the tar material to a depth of 10 feet bgs, that it will collect samples from 0'-2', 5', and 10' bgs. Fort Bliss must analyze the samples taken from beneath the tar material for the same analytes as specified above. If Fort Fort Bliss determines that the actual depth of the Tar Material Area pit is 9' to 12' bgs (see Comment 31), then the total depth should be deepened to 30 feet bgs.</p>		<p>Bliss will analyze the samples collected from the total depth of each soil boring for BTEX, TPH-DRO, SVOCs, RCRA Metals, pesticides, herbicides and PCBs.</p>	
31	Attachment B.1, Section 5.1.2	<p>Fort Bliss indicates in Section 5.1.2 (<i>Investigative Trench</i>) of Attachment B.1 that the Tar Material Area pit depth is assumed to be 9 to 12 feet for the purposes of determining soil sample depths for the two proposed soil borings. In its 1997 RFI Report, Fort Bliss reported the tar material to be approximately one inch in thickness. Fort Bliss must review its data and determine whether the tar material is likely to be 9 to 12 feet thick or only a few inches thick. If the tar material is 9 to 12 feet thick, then Fort Bliss should retain the Investigative Trench. However, if the tar material is only a few inches thick, then Fort Bliss should delete the Investigative Trench. Fort Bliss must propose how it will dispose of the tar material.</p>	C, E	<p>Fort Bliss will remove the tar materials from the site and dispose of it at a licensed facility. Fort Bliss will not characterize the tar material itself for identification purposes. Fort Bliss will assess the subsurface soil beneath the tar material area for impacts to the environment. The thickness and volume of the tar material disposed of will be documented in the RFI Report. The tar will be analyzed for disposal purposes only. Two soil borings will be collected to 10 feet in the tar area.</p>	

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		As noted in Comment 20, onsite burial is not appropriate.			
32	Attachment B.1	Fort Bliss must revise Attachment B.1 to include discussion on how it will incorporate the data from the 1997 investigation.	C	Fort Bliss will revise the RFI workplan to incorporate the historical assessment data.	
33	Attachment B.1, Section 5.3	NMED recommends that Fort Bliss revise Attachment B.1 (Table 5-1) to be consistent with previous investigations (see the 1996 RFI Work Plan); specifically, drilling and soil sampling should be tied SWMU 25, rather than the contractor that will conduct the field work.	C	See response to comments 29 and 30. Fort Bliss will revise the table accordingly.	
34	Attachment B.1, Section 5.3	Fort Bliss must revise Section 5.3 (<i>Equipment Decontamination Procedures</i>) of Attachment B.1 to specify how it will dispose the decontamination water, dumping it on the ground may not be appropriate. Fort Bliss may dispose the decontamination water by discharging it to the headworks at it Orogrande wastewater treatment lagoon.	C	Fort Bliss will not dispose of water that exceeds the residential screening levels on the ground. The workplan will be revised to describe the water handling procedure.	
35	Attachment B.1, Section 5.4	Fort Bliss must revise Section 5.4 (<i>Survey Sample Locations</i>) of Attachment B.1 to specify the vertical as well as the horizontal accuracy.	C	Fort Bliss will survey the soil boring locations for vertical and horizontal coordinates. These measurements will be incorporated with the soil sample depths to determine the elevations of the samples relative to mean sea level.	
36	Attachment B.1, Section 6.4.1	NMED recommends that Fort Bliss revise Section 6.4.1 (<i>Sampling Numbering System</i>) and Table 6-1 to specify that the soil borings and samples will reference SWMU-25 rather than the contractor.	C	See comment 29. Fort Bliss will revise Section 6.4.1 accordingly.	
37	Attachment B.1, Section 8.1	Fort Bliss must review Section 8.1 (<i>Soil Cuttings</i>) of Attachment B.1 by deleting the inappropriate reference to industrial-occupational RBSLs (sic.), as discussed above. Fort Bliss may dump the drummed soil cuttings on the ground if the analytical results demonstrate that there is no exceedence of NMED's residential soil screening levels (SSLs). Fort Bliss must revise Section 8.1 to specify how it will manage the cuttings if the analytical results demonstrate that hazardous constituents exceed NMED's SSLs. Fort Bliss may dispose of contaminated soil cuttings that are not characteristically hazardous at a permitted solid waste landfill.	C	See comment 7. Fort Bliss will make the necessary revisions to Section 8.1. Fort Bliss will not dispose of soil that exceeds the residential screening levels on the ground. The workplan will be revised to describe the soil handling procedure.	
38	Attachment	Fort Bliss must revise Section 8.2 (<i>Groundwater and</i>	C	Fort Bliss will not dispose of water that exceeds the	

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	B.1, Section 8.2	<i>Decontamination Water</i>) of Attachment B.1 to reflect that all comparisons will be to residential standards. If the analytical results indicate that the concentrations of hazardous constituents in the water do not exceed NMED's ground water protection standards, then Fort Bliss may dispose of the water by discharging it to the headworks at its Orogrande wastewater treatment lagoon. Fort Bliss must revise Section 8.2 to specify how it will dispose of contaminated water that exceeds a ground water protection standard. Fort Bliss may not dispose of decontamination water by discharging it the ground unless it can be demonstrated that the water does not contain hazardous constituents at concentrations that exceed a ground water protection standard.		residential screening levels on the ground. The workplan will be revised to describe the water handling procedure.	
39	Attachment B.1, Section 8.3	Fort Bliss must revise Section 8.3 (<i>Personal Protective Equipment</i>) of Attachment B.1 to specify how it will dispose of Personal Protective Equipment (PPE). Section 8.3 indicates that "Disposal will then follow similar procedures as described for soil cuttings." Section 8.1 presently specifies that Fort Bliss will pour the soil cuttings on the ground. Fort Bliss may not dispose of PPE by dumping it on the ground.	C	Fort Bliss will not dispose of PPE on the ground. Fort Bliss will dispose of the PPE in the El Paso municipal waste system. Section 8.3 will be revised to describe the waste handling procedures.	
10	Attachment B.2	As NMED discussed in its November 24, 2004 NOD to Fort Bliss, facilities must submit analytical data that is based on the method detection limits, not laboratory "reporting limits." Fort Bliss must revise Attachment B.2 by deleting the term "reporting limit." In its RFI Report, Fort Bliss must specify whether a constituent was detected; all detections must be reported, even if the laboratory cannot quantify the concentration at which the constituent has been detected.	C, E	Fort Bliss will report all detections of analytes reported by the laboratory. Fort Bliss will ensure that the reporting limits do not exceed the residential screening levels for soil or water. Analyte concentrations that are detected but are less than the reporting limit, will be documented in the laboratory reports with a "J" qualifier. Fort Bliss will revise the workplan accordingly.	
41	Attachment B.2, Section 5.0	Fort Bliss must revise Section 5.0 (<i>Analytical Procedures</i>) of Attachment B.2 to specify that Fort Bliss will analyze the surface soil samples for the same constituents as the subsurface samples.	C	Fort Bliss will analyze the surface soil samples and the background samples for the same list of analytes as the subsurface samples. Fort Bliss will revise the RFI workplan accordingly. See response to Comment 30.	
42	Attachment C	NMED does not review and approve Health & Safety Plans; therefore, NMED has no comments on Attachment C (Health and Safety Plan).	C	The Health and Safety plan will not be part of the revised workplan.	

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1		Fort Bliss must submit a second copy of its proposed RCRA Facility Investigation (RFI) Workplan and two copies of its revised RFI Workplan.	C, E	Fort Bliss will submit two copies of the revised workplan.	
2		NMED is unable to read the enclosed CD-Rom. Fort Bliss must submit a revised CD-ROM without any special security provisions	C	Fort Bliss will submit a new copy of the CD-ROM report in the revised workplan.	
3		Figure 2-1 through 2-6 were not provided. Fort Bliss' revised work plan must include all Work Plan figures.	E	Figure 2-1 is the only figure required for the revised workplan. The remaining figures will not be provided. The table of contents will be changed accordingly.	
4		Attachment D was not provided Fort Bliss' revised work plan must include Attachment D.	C, E	Attachment D will be removed from the revised workplan. The table of contents will be changed accordingly. The certifications will be submitted with the final report.	
5	1.2	Section 1.2 (<i>Regulatory Framework</i>) is incorrect. After Fort Bliss has implemented its proposed RFI Work Plan, it must submit to NMED a RCRA Facility Investigation (RFI) Report, not a Voluntary Corrective Action (VCA) Report, in order to comply with its permit. After the approved RFI Work Plan has been implemented and a RFI Report submitted, NMED will review the results to determine whether Fort Bliss has adequately characterized Solid Waste Management Unit (SWMU) 25 or whether additional investigation and/or corrective measures are required. If Fort Bliss is able to demonstrate that no release has occurred, then NMED will recommend that Fort Bliss submit a No Further Action (NFA) petition. Fort Bliss must revise its RFI Work Plan to refer to the future submittal of the required RFI Report. If corrective measures are required, NMED will specify what actions Fort Bliss is required to take.	C	Fort Bliss will submit a RFI report following conclusion of the site investigation.	
6	1.3	As discussed in Comment 5, Fort Bliss must submit a RFI Report after implementing its RFI Work Plan. Fort Bliss must revise Section 1.3 appropriately.	C	Fort Bliss will revise the RFI Work Plan to indicate that a RFI Report will be submitted.	
7		NMED informed all RCRA regulated facilities in New Mexico on January 23, 2001, that industrial risk-based screening soils for soils could not be used to determine whether a threat to either human health or the environment exists. NMED will not approve work plans or	C	Fort Bliss will use residential screening levels rather than industrial-commercial screening levels.	

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		reports that propose the use of industrial or occupational cleanup standards until such time as statutory authority is created that allows NMED to restrict future land use. Fort Bliss must revise Section 1.3 and the entire RFI Work Plan to specify that it will compare all analytical results to residential standards. Fort Bliss may, at its discretion, include industrial standards comparison.			
8	2.0	Section 2.0 (<i>Site Background and Setting</i>) briefly discusses the operations at its Orogrande landfill between 1983 and 1994. Fort Bliss must revise Section 2.0 to address how solid waste was historically handled at the Orogrande Range Campe before 1983 and after 1994.	C	Fort Bliss will include a history of the landfill before 1983 and after 1994 according to available background information. The exact history of the Orogrande landfill has not been well documented.	
9	2.3	Section 2.3 (Previous Investigations) briefly discusses Fort Bliss' 1997 RFI Report on SWMU 25, but does not address data gaps. Fort Bliss must revise Section 2.3 by including a discussion on data gaps and must specifically discuss why Fort Bliss did not collect all of the samples proposed in its 1996 RFI Work Plan.	C	The revised workplan will provide a discussion of data gaps from previous investigations.	
10	2.3	Section 2.3 refers to "background" soil concentrations when summarizing its 1997 RFI Report; however, the 1997 RFI Report did not discuss the specific statistical procedures used to determine the "background".	C	The revised workplan will include a statistically robust sampling and analysis plan to establish background soil concentrations.	
11	2.3	Section 2.3 indicates that the geotechnical analysis of the "cover" demonstrates that the hydraulic conductivity values exceeded those required by the New Mexico Solid Waste Management Regulations (SWMR). In fact, only one of two soil caps meet the SWMR Standards. Fort Bliss also notes in Section 2.3, the soil cap has subsided, making the hydraulic conductivity argument irrelevant. Fort Bliss must revise Section 2.3 appropriately.	C	Fort Bliss will design a cover system for SWMU-25 based on the data presented in the RFI report.	
12	2.3	Fort Bliss must revise Section 2.3 to discuss the analytical results of the tar material samples.	E	Analytical results of the tar material are not available and cannot be incorporated into the previous investigations section. Soil samples from the tar material area will be collected and analyzed to assess the human and ecological risk associated with the tar. The tar material on the surface will be removed from the site	

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				and disposed of in a licensed facility.	
13	4.0	Section 2.3 states that there are no identifiable potential receptors. This is incorrect and contradicts information that Fort Bliss has previously submitted to NMED. SWMU 25 is located in the northern part of the Chihuahuan Desert Biotic Province and, as Fort Bliss reported in its 2002 VCA Report for SWMU 20, the fauna of desert grasslands is both "rich and diverse." Fort Bliss must revise its RFI Work Plan to include a Screening-Level Ecological Assessment (SLERA) of SWMU 25. Fort Bliss must follow NMED's current ecological risk assessment guidance when revising its RFI Work Plan.	C	A SLERA will be performed as part of the RFI.	
14	4.0	Section 4.0 (<i>RCRA Facility Investigation Activities</i>) states that ten background soil samples will be collected. Fort Bliss must revise Section 4.0 to discuss in detail how the ten background soil samples will be statistically analyzed. As discussed in Comments 18 and 22 below, Fort Bliss must also analyze the background samples for organic constituents to demonstrate that the collected samples are suitable for determining background concentrations.	C	Fort Bliss will collect and analyze at least ten samples from each verifiable soil type that is found within 100 yards of the site. Statistical analyses performed on each analyte for each data set includes (1) a normality test, (2) Mann-Whitney U test to determine the statistical means, and (3) quantile test to determine the true exceedence by an environmental sample concentration over the respective background mean concentration. Fort Bliss will analyze background samples for BTEX, TPH, PCBs, and RCRA metals.	
15	4.0	Fort Bliss must revise Section 4.0 to specify that it will compare its analytical results to residential standards for the reasons discussed in Comment 7.	C	Fort Bliss will modify the workplan accordingly.	
16	4.0	Fort Bliss must revise Section 4.0 to specify that it will submit a RFI Report, not an Investigation Summary Letter, for the reasons discussed in Comment 6.	C	Fort Bliss will submit a RFI Report, not an investigation summary letter.	
17	4.0	Fort Bliss must revise Section 4.0 to that it will conduct a SLERA, for the reasons discussed in Comment 13.	C	Fort Bliss will modify the workplan accordingly.	
18	4.0	Fort Bliss must revise Table 4-1 to reflect the requirement to demonstrate that its background samples are, in fact, suitable for use as background samples by analyzing for organic constituents and that it will conduct a SLERA.	C	See comments 13 and 14. Fort Bliss will revise the table accordingly.	
19	5.0	Fort Bliss incorrectly assumed that NMED would not review its proposed RFI Work plan. Fort bliss must revise	C	Fort Bliss will incorporate time allotted for NMED review of the revised workplan and the RFI Report, as	

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		Section 5.0 (<i>Project Schedule</i>) to allow for regulatory review and for Fort Bliss to revise its proposed RFI Work Plan. As NMED noted in its fee assessment letter of December 21, 2004, NMED conducts technical reviews of submittals in accordance with 20.4.2.200.A(7)NMAC.		well as a NMED comment review period.	
20	Attachment A, Section 2.2	Section 2.2 (Task 2 – <i>Field Investigation</i>) of Attachment A indicates that the unknown material at the “Tar Material Area” will be replaced into the trench. Fort Bliss reported in its 1997 RFI Report that the tar was approximately one inch in thickness and a few feet wide. Figure 4-4-5 of the 1997 RFI Report depicts the tar as being approximately 300 feet long and 25 feet wide (see Comment 31) . Fort Bliss must revise Section 2.2 to discuss the purpose of digging a trench for material that it has reported to be approximately one inch in thickness. Fort Bliss must also revise Section 2.2 to specify how the tar material will be appropriately handled and disposed of. NMED does not consider burial of the tar material in an onsite trench to be appropriate disposal.	E	Attachment A is a contract document between Malcolm Pirnie and the USACE. It cannot be modified and will be removed in the revised workplan. Fort Bliss will revise the workplan to remove the proposed trench.	
21	Attachment A, Section 2.2	Section 2.2 of Attachment A indicates that two soil samples will be collected from the soil borings advanced adjacent to the tar material area. Fort Bliss must revise this section to specify that the two soil borings will be advanced in the middle of the tar material rather than adjacent to it.	E	Attachment A is not necessary and will be removed in the revised workplan. Fort Bliss will advance two soil borings to depth of 10 feet in the tar area.	
22	Attachment A, Section 2.2	Fort Bliss must revise Section 2.2 of Attachment A to specify that it will document that the proposed background soil samples are appropriate by analyzing for organic constituents as well as RCRA metals, as was done in the 1996 investigation. Fort Bliss must also revise this section to correctly indicate the SW-846 methods that will be used for soil analysis. Elsewhere, Fort Bliss specifies that it will analyze for RCRA metals using SW-846 Methods 6020 and 7471.	E	See response to comments 14 and 20.	
23	Attachment A, Section 2.2	Fort Bliss discusses a “No Further Action Required” decision in Section 2.3 (Task 3 – <i>Reports</i>) of Attachment A. Based on the results of the investigation, Fort Bliss may recommend a “Determination of No Further Action” in accordance with Section I.V.R of its RCRA permit 20.4.2	E	Attachment A is not necessary and will be removed in the revised work plan. Fort Bliss will submit a RFI Report.	

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		NMAC. If NMED agrees, then it will inform Fort Bliss that it should submit a No Further Action (NFA) Petition to modify its permit. As noted above, Fort Bliss must submit a RFI Report on the results of this investigation, not a "Summary Letter." The RFI Report may include a recommendation for a NFA determination. If NMED does not require additional corrective action, then Fort Bliss must submit a NFA petition for a Class I permit modification, not a RFI Report. Fort Bliss must revise Section 2.3 appropriately.			
24	Attachment A, Section 4.0	The last sentence in Section 4.0 (<i>Site Location</i>) has a typo.	E	Attachment A is not necessary and will be removed in the revised work plan.	
25	Attachment B.1, Figure 5-1	Figure 5-1 (<i>Proposed Sample Locations</i>) of Attachment B.1 is a aerial photo. Although NMED encourages the use of aerial photos, photos do not substitute for a topographic base map. Fort Bliss must revise Attachment B.1 to include a detailed site map based on either a USGS topographic quadrangle map or a professionally surveyed site map. NMED recommends that Fort Bliss also retain the aerial photos. Figure 5-1 was included twice in Attachment B.1.	C	Fort Bliss will revise the site figure in the workplan to include a USGS topographic map. Major features (humps, swales, landfill boundaries, etc) will be added to the map after in the RFI report using survey information collected during the field work.	
26	Attachment B.1, Section 4.0	The appropriate soil screening standard is residential, not industrial. Fort Bliss must revise Section 4.0 (Non-measurement Data Acquisition) to reflect this requirement.	C	Fort Bliss will revise the workplan accordingly.	
27	Attachment B.1, Section 5.1.1	Fort Bliss must revise Section 5.1.1 (<i>Soil Boring</i>) to discuss how the "expected perimeter" of SWMU 25 was determined. To demonstrate that a release has not occurred, Fort Bliss must advance the soil boring at the margin of the landfill cells. Fort Bliss cannot demonstrate that a release has not occurred by collecting samples at an indeterminate distance from the "expected perimeter".	C	The boundaries of the landfill will be trenched to physically delineate the extent of waste. The results of these activities will documented in the RFI Report.	
28	Attachment B.1, Section 5.1	Fort Bliss proposes in Section 5.1 (<i>Soil Investigation</i>) of Attachment B.1 to collect a very limited number of samples from a very limited number of soil borings and to analyze those samples for a very limited number of parameters. NMED's next three comments address deficiencies in the location of the soil borings, the number of samples to be collected, and the analyte list.	C	See comments 29 through 31. Fort Bliss will revise the RFI workplan.	

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		One of the main objectives of the investigation is to determine whether a release of hazardous waste or hazardous constituents has occurred. To demonstrate that a release has not occurred, Fort Bliss must take a sufficient number of samples from an adequate number of locations and analyze those samples for all reasonably expected constituents.			
29	Attachment B.1, Section 5.1	<p>Fort Bliss proposed to collect seven samples from five soil borings advanced to 50' bgs in its 1996 RFI Work Plan, but only collected samples from three of the soil borings. In its 1996 investigation, Fort Bliss collected one sample on the south end of the trench and two samples on the west margin of the trench but failed to collect samples from either the north or east side of the trench. By doing so, Fort Bliss failed to demonstrate that a release had not occurred on the east or north margins of SWMU 25.</p> <p>In its 2004 RFI Work plan Fort Bliss proposes to install only three soil borings around the landfill; however, Fort Bliss proposes to collect ten samples to determine background. Because Fort Bliss has not provided a site map (such as Figure 4-4-5 in its 1997 RFI Report) NMED cannot approve the proposed location of the three soil borings. At a minimum, Fort Bliss must install three additional soil borings on the east side and one additional soil boring at the north end of the trench and also one additional soil boring on the west side of the trench located equidistant between SB25-1 and SB2-5. Without a detailed site sampling location map, NMED cannot approve the proposed location of MPB-3, but does agree that the proposed depth is appropriate.</p>	C, E	<p>Fort Bliss will install a total of eight soil borings including:</p> <ul style="list-style-type: none"> — Three on east side of landfill (30 feet deep) — One on north and one on west side of landfill (30 feet deep) — One on south side of landfill (115 feet deep) — One on north end and one on south end of tar material area (10 feet deep) in the tar material area. <p>Fort Bliss will continue with "MPSB-X" nomenclature for boring identification.</p>	
29	Attachment B.1, Section 5.1	<p>Fort Bliss proposed to collect seven samples from five soil borings advanced to 50' bgs in its 1996 RFI Work Plan, but only collected samples from three of the soil borings. In its 1996 investigation, Fort Bliss collected one sample on the south end of the trench and two samples on the west margin of the trench but failed to collect samples from either the north or east side of the trench. By doing</p>	C, E	<p>Fort Bliss will install a total of eight soil borings including:</p> <ul style="list-style-type: none"> — Three on east side of landfill (30 feet deep) — One on north and one on west side of landfill (30 feet deep) — One on south side of landfill (115 feet deep) — One on north end one on south end of tar 	

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		<p>so, Fort Bliss failed to demonstrate that a release had not occurred on the east or north margins of SWMU 25.</p> <p>In its 2004 RFI Work plan Fort Bliss proposes to install only three soil borings around the landfill; however, Fort Bliss proposes to collect ten samples to determine background. Because Fort Bliss has not provided a site map (such as Figure 4-4-5 in its 1997 RFI Report) NMED cannot approve the proposed location of the three soil borings. At a minimum, Fort Bliss must install three additional soil borings on the east side and one additional soil boring at the north end of the trench and also one additional soil boring on the west side of the trench located equidistant between SB25-1 and SB2-5. Without a detailed site sampling location map, NMED cannot approve the proposed location of MPB-3, but does agree that the proposed depth is appropriate.</p>		<p>material area (10 feet deep)</p> <p>Fort Bliss will continue with "MPSR-X" nomenclature for boring identification.</p>	
30	Attachment B.1, Section 5.1	<p>Section 5.1 and Tables 5-1 and 5-2 of Attachment B.1 do not match and must be revised appropriately. Fort Bliss indicates that Table 5-1 specifies the sample depths (page 5-3); however, Table 5-1 only provides the proposed total depth for each soil boring. Section 5-1 does not actually discuss Table 5-2. The text in paragraph 1 on page 5-4 appears to indicate that the background surface soil samples will be analyzed for all the parameters in Table</p>	C, E	<p>Fort Bliss finds the number of samples and analysis requested by NMED to be unnecessary. Such extensive vertical profiling does not necessarily aid the assessment of whether a release occurred at the landfill.</p> <p>Fort Bliss will collect soil samples from the 0'-2', 13'-15', 28'-30', and 113'-115' (deep boring only) sampling intervals. Assuming a 12-foot total depth for the landfill,</p>	
		<p>5-2. However, it appears that the proposed sample depths for the three soil boring dedicated to the trench area are summarized in Table 5-2. NMED agrees with the proposed total depth of 30 feet bgs, but requires additional soil borings, more frequent sample intervals, and additional chemical analysis. Fort Bliss must revise Section 5.0 (<i>Field Activities</i>) to specify the following:</p> <ul style="list-style-type: none"> • Fort Bliss will advance a minimum of six soil borings, as specified in Comment 29; • Collections of samples from each boring at the following intervals and depths: 0'-2', 5', 10', 15', 		<p>these samples will help define the vertical extent of waste.</p> <p>Fort Bliss will collect samples from the tar area, soil borings from 0'-2' and at 10' bgs.</p> <p>Fort Bliss does not consider the known historical use of the landfill indicative of a requirement to analyze all of the soil samples for the complete suite of analytes suggested by NMED. Fort Bliss will analyze all environmental and background soil samples for BTEX, TPH-DRO, PCBs, and RCRA metals. In addition, Fort</p>	

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		<p>20', 25'; and 30' bgs;</p> <ul style="list-style-type: none"> • Chemical analysis of all samples for BTEX, TPH-DRO, SVOCs, RCRA metals, pesticides, herbicides, and PCBs. <p>NMED approves Fort Bliss' proposal to collect geotechnical from the deep boring.</p> <p>NMED cannot approve the proposed background locations until Fort Bliss provides a detailed site map, but agrees that the proposed distance from SWMU 25 is appropriate. However, as discussed above, Fort Bliss must demonstrate the proposed surface grab samples are acceptable background samples by analyzing for the same constituents as for the surface investigation soil samples.</p> <p>Fort Bliss must revise Section 5.1 to specify that it will collect and analyze at least one sample of tar material, that it will advance two soil borings through the tar material to a depth of 10 feet bgs, that it will collect samples from 0'-2', 5', and 10' bgs. Fort Bliss must analyze the samples taken from beneath the tar material for the same analytes as specified above. If Fort Fort Bliss determines that the actual depth of the Tar Material Area pit is 9' to 12' bgs (see Comment 31), then the total depth should be deepened to 30 feet bgs.</p>		Bliss will analyze the samples collected from the total depth of each soil boring for BTEX, TPH-DRO, SVOCs, RCRA Metals, pesticides, herbicides and PCBs.	
31	Attachment B.1, Section 5.1.2	<p>Fort Bliss indicates in Section 5.1.2 (<i>Investigative Trench</i>) of Attachment B.1 that the Tar Material Area pit depth is assumed to be 9 to 12 feet for the purposes of determining soil sample depths for the two proposed soil borings. In its 1997 RFI Report, Fort Bliss reported the tar material to be approximately one inch in thickness. Fort Bliss must review its data and determine whether the tar material is likely to be 9 to 12 feet thick or only a few inches thick. If the tar material is 9 to 12 feet thick, then Fort Bliss should retain the Investigative Trench. However, if the tar material is only a few inches thick, then Fort Bliss should delete the Investigative Trench. Fort Bliss must propose how it will dispose of the tar material.</p>	C, E	Fort Bliss will remove the tar materials from the site and dispose of it at a licensed facility. Fort Bliss will not characterize the tar material itself for identification purposes. Fort Bliss will assess the subsurface soil beneath the tar material area for impacts to the environment. The thickness and volume of the tar material disposed of will be documented in the RFI Report. The tar will be analyzed for disposal purposes only. Two soil borings will be collected to 10 feet in the tar area.	

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		As noted in Comment 20, onsite burial is not appropriate.			
32	Attachment B.1	Fort Bliss must revise Attachment B.1 to include discussion on how it will incorporate the data from the 1997 investigation.	C	Fort Bliss will revise the RFI workplan to incorporate the historical assessment data.	
33	Attachment B.1, Section 5.3	NMED recommends that Fort Bliss revise Attachment B.1 (Table 5-1) to be consistent with previous investigations (see the 1996 RFI Work Plan); specifically, drilling and soil sampling should be tied SWMU 25, rather than the contractor that will conduct the field work.	C	See response to comments 29 and 30. Fort Bliss will revise the table accordingly.	
34	Attachment B.1, Section 5.3	Fort Bliss must revise Section 5.3 (<i>Equipment Decontamination Procedures</i>) of Attachment B.1 to specify how it will dispose the decontamination water, dumping it on the ground may not be appropriate. Fort Bliss may dispose the decontamination water by discharging it to the headworks at it Orogrande wastewater treatment lagoon.	C	Fort Bliss will not dispose of water that exceeds the residential screening levels on the ground. The workplan will be revised to describe the water handling procedure.	
35	Attachment B.1, Section 5.4	Fort Bliss must revise Section 5.4 (<i>Survey Sample Locations</i>) of Attachment B.1 to specify the vertical as well as the horizontal accuracy.	C	Fort Bliss will survey the soil boring locations for vertical and horizontal coordinates. These measurements will be incorporated with the soil sample depths to determine the elevations of the samples relative to mean sea level.	
36	Attachment B.1, Section 6.4.1	NMED recommends that Fort Bliss revise Section 6.4.1 (<i>Sampling Numbering System</i>) and Table 6-1 to specify that the soil borings and samples will reference SWMU-25 rather than the contractor.	C	See comment 29. Fort Bliss will revise Section 6.4.1 accordingly.	
37	Attachment B.1, Section 8.1	Fort Bliss must review Section 8.1 (<i>Soil Cuttings</i>) of Attachment B.1 by deleting the inappropriate reference to industrial-occupational RBSLs (sic.), as discussed above. Fort Bliss may dump the drummed soil cuttings on the ground if the analytical results demonstrate that there is no exceedence of NMED's residential soil screening levels (SSLs). Fort Bliss must revise Section 8.1 to specify how it will manage the cuttings if the analytical results demonstrate that hazardous constituents exceed NMED's SSLs. Fort Bliss may dispose of contaminated soil cuttings that are not characteristically hazardous at a permitted solid waste landfill.	C	See comment 7. Fort Bliss will make the necessary revisions to Section 8.1. Fort Bliss will not dispose of soil that exceeds the residential screening levels on the ground. The workplan will be revised to describe the soil handling procedure.	
38	Attachment	Fort Bliss must revise Section 8.2 (<i>Groundwater and</i>	C	Fort Bliss will not dispose of water that exceeds the	

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2. Commenter Agrees (A) with response, or Does not Agree (D) with response

Comment #	Section/ Page	Comment	C, D, E ¹	Response	A or D ²
	B.1, Section 8.2	<i>Decontamination Water</i>) of Attachment B.1 to reflect that all comparisons will be to residential standards. If the analytical results indicate that the concentrations of hazardous constituents in the water do not exceed NMED's ground water protection standards, then Fort Bliss may dispose of the water by discharging it to the headworks at its Orogrande wastewater treatment lagoon. Fort Bliss must revise Section 8.2 to specify how it will dispose of contaminated water that exceeds a ground water protection standard. Fort Bliss may not dispose of decontamination water by discharging it the ground unless it can be demonstrated that the water does not contain hazardous constituents at concentrations that exceed a ground water protection standard.		residential screening levels on the ground. The workplan will be revised to describe the water handling procedure.	
39	Attachment B.1, Section 8.3	Fort Bliss must revise Section 8.3 (<i>Personal Protective Equipment</i>) of Attachment B.1 to specify how it will dispose of Personal Protective Equipment (PPE). Section 8.3 indicates that "Disposal will then follow similar procedures as described for soil cuttings." Section 8.1 presently specifies that Fort Bliss will pour the soil cuttings on the ground. Fort Bliss may not dispose of PPE by dumping it on the ground.	C	Fort Bliss will not dispose of PPE on the ground. Fort Bliss will dispose of the PPE in the El Paso municipal waste system. Section 8.3 will be revised to describe the waste handling procedures.	
40	Attachment B.2	As NMED discussed in its November 24, 2004 NOD to Fort Bliss, facilities must submit analytical data that is based on the method detection limits, not laboratory "reporting limits." Fort Bliss must revise Attachment B.2 by deleting the term "reporting limit." In its RFI Report, Fort Bliss must specify whether a constituent was detected; all detections must be reported, even if the laboratory cannot quantify the concentration at which the constituent has been detected.	C, E	Fort Bliss will report all detections of analytes reported by the laboratory. Fort Bliss will ensure that the reporting limits do not exceed the residential screening levels for soil or water. Analyte concentrations that are detected but are less than the reporting limit, will be documented in the laboratory reports with a "J" qualifier. Fort Bliss will revise the workplan accordingly.	
41	Attachment B.2, Section 5.0	Fort Bliss must revise Section 5.0 (<i>Analytical Procedures</i>) of Attachment B.2 to specify that Fort Bliss will analyze the surface soil samples for the same constituents as the subsurface samples.	C	Fort Bliss will analyze the surface soil samples and the background samples for the same list of analytes as the subsurface samples. Fort Bliss will revise the RFI workplan accordingly. See response to Comment 30.	
42	Attachment C	NMED does not review and approve Health & Safety Plans; therefore, NMED has no comments on Attachment C (Health and Safety Plan).	C	The Health and Safety plan will not be part of the revised workplan.	