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GOVERNOR

FB05  
**State of New Mexico**  
**ENVIRONMENT DEPARTMENT**

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ENTERED



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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

March 3, 2005

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

**SUBJECT: CLOSURE PLAN MODIFICATION**  
**OPEN DETONATION UNIT**  
**FORT BLISS, NEW MEXICO**  
**EPA ID NO. NM4213720101-01**

Dear Mr. Landreth:

Fort Bliss notified the New Mexico Environment Department (NMED) that it intends to close their Open Detonation Treatment Unit in a meeting on February 14, 2005. NMED evaluated Fort Bliss Closure Plan included as Attachment F to Fort Bliss' Open Detonation Treatment Unit operating permit, issued in 1995, to determine whether there was a need to update the Closure Plan to ensure compliance with current regulations and practices.

NMED has determined that there is a need for Fort Bliss to provide additional information in their Closure Plan before implementation. In general, portions of Fort Bliss' Closure Plan (Permit Attachment F) lack specificity and require more detail; therefore, NMED is providing comments on the Closure Plan included in Fort Bliss' 1995 Operating Permit. Fort Bliss must modify the Closure Plan to incorporate the comments. In accordance with Permit Attachment F (see page 3), Fort Bliss must address these comments and submit a request to modify their Closure Plan within 60 days of receipt of this letter. Fort Bliss must also include a response letter with the revised Closure Plan that details where revisions have been made, cross-referencing NMED's numbered comments.

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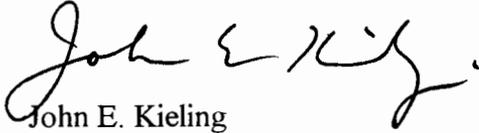
1. *Closure Procedures (Page 3)* Fort Bliss must revise this section to show, on a detailed map, the areal extent that the 'hazards survey' will cover.
2. *Phase 1 – Site Characterization (Page 5)* Fort Bliss must revise this section to specify how it will determine the horizontal distance to which "...a fragment could be expected to be blown to by a maximum explosion. ...."
3. *Phase 1 – Site Characterization (Page 5)* Fort Bliss must explain how metal detecting equipment is used to ensure that there are no Unexploded Ordnance (UXO) residues in the surface soils.
4. *Site Sampling (Pages 5-6)* Fort Bliss must revise this section to specify in detail the area in which it proposes to collect and analyze surface soils samples. Fort Bliss must address how it will characterize the following areas through soil sample collection and analysis: (1) the small-scale open detonation pits (blast pits); (2) the large-scale open detonation unit or OD Excavation; (3) the kickout area surrounding the detonation area; and, (4) background soil sample locations.
5. *Site Sampling (Pages 5-6)* Fort Bliss must include a detailed map of the open detonation treatment unit and surrounding area. On this map, illustrate the approximate locations of the surface soil samples that Ft. Bliss proposes to collect and analyze to characterize the site.
6. *Site Sampling (Pages 5-6)* Fort Bliss must revise this section to address how it will determine background concentrations for inorganic constituents. Fort Bliss presently specifies that it will take "...3 discreet samples from an area of the site (approximately 700 feet from the center of the Unit) that has not been impacted by operation of the OD to serve as outer monitoring points." Fort Bliss should revise this section to specify whether the "outer monitoring points" are background soil sample locations. Collection of three samples to determine background does not provide a statistically valid data set for determination of background concentrations. Fort Bliss should refer to EPA statistical guidance on the number of samples required to establish statistically valid background concentrations.
7. *Table F-1 (Page 8)* Fort Bliss must revise Table F-1 to include dioxins and furans. The requirement to sample for dioxins is specified in Permit Condition III.I.1. Furans must be added because furans and other combustion by-products are commonly found at open burn/open detonation sites. Dioxins and furans must be analyzed using SW-846 Method 8280.

8. *Phase 2 – Remedial Action (Page 10)* Fort Bliss must revise this section to specify that closure clean-up levels will be based on residential standards, not on potential and surrounding land use. NMED does not accept industrial risk-based screening levels and cleanup levels for soils at sites undergoing clean closure. NMED will not approve the use of industrial cleanup levels until such time as statutory authority is created that allows NMED to restrict future land use.
9. *Site Remediation (Page 10)* If remediation is required, the closure plan must be modified pursuant to 20.4.1.900 NMAC, incorporating Attachment 1 to 40 CFR 270.42, to specify the remediation technologies that it will use to clean close this unit. Fort Bliss must revise this section to include specific closure procedures in its revised closure plan.
10. *Site Remediation (Page 10)* Fort Bliss must revise this section to state that if soil is excavated as a remedy, then soil samples will be collected from the limits of the excavation(s) at a specified spacing (*e.g.* one sample for every 150 square feet in the base of the excavation, one sample for every 20 linear feet of excavation side wall) and analyzed for the appropriate analytical suite to confirm waste and waste residue were completely removed.
11. *Site Restoration (Page 10)* Fort Bliss must revise this section to clearly state whether Fort Bliss will backfill the entire large-scale OD Excavation or regrade the site and backfill the small-scale detonation pits.
12. *Site Restoration (Page 10)* Fort Bliss indicates in this section that it does not plan to plant any vegetation to restore the site. NMED suggests that Fort Bliss revegetate the site to reduce potential erosion and dust generation and specify in the Closure Plan that it will revegetate the closed area with native vegetation.
13. *Phase 3 – Post Closure Care (Page 11)* If Fort Bliss is unable to achieve clean closure, then the OD treatment unit must be closed with waste in place (closure as a landfill) and NMED will require Fort Bliss to submit a post-closure permit application to NMED within 90 days of its determination that clean closure cannot be achieved (see Introduction section in Permit Attachment J for appropriate language).

Keith Landreth  
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If you have any questions concerning this letter, please call Cheryl Frischkorn at 505-428-2550.

Sincerely,



John E. Kieling  
Manager  
Permits Management Program

JEK:dc:caf

Attachment

cc: J. Bearzi, NMED HWB  
D. Cobrain, NMED HWB  
C. Frischkorn, NMED HWB  
L. King, EPA Region 6 (6PD-N)  
Pat McKernan, Fort Bliss  
Elsa Cushing, Fort Bliss

File: Reading File & ~~FB~~ 2005 File