



**BILL RICHARDSON**  
GOVERNOR

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

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**RON CURRY**  
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**DERRITH WATCHMAN-MOORE**  
DEPUTY SECRETARY

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

April 25, 2005

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

**SUBJECT: APPROVAL OF THE 2004 COMPLIANCE SAMPLING RESULTS  
REPORT FOR MCGREGOR RANGE OPEN DETONATION (OD) UNIT  
FORT BLISS, NEW MEXICO EPA ID NO. NM4213720101-01  
HWB-FB 05-001**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has received the *2004 Compliance Sampling Results Report for McGregor Range Open Detonation (OD) Unit*, dated February 2005. NMED has accepted the document for technical review. NMED has reviewed the aforementioned document submitted by Fort Bliss (the Permittees) and hereby approves the report with the following comments.

**Specific Comments**

**1) Section 3.1, Evaluation Methods, page 3-1:**

**Paragraph 2**

**Permittees' Statement:** "The background values were established during the 1995 Initial Investigation as three times the maximum reported value from three background locations."

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**NMED Comment:** In the future, the Permittees cannot use this method for determining background values. The Permittees must use NMED approved methods for determining background at a site. If there is no established background value, comparisons will be made only to NMED's residential SSLs. As a reminder, there are updated methods for determining background and the Permittees must continue to update their own methods for determining background in accordance with revised guidance.

**Permittees' Statement:** "Similar to the organic constituents, none of the reported metals were found to exceed the NMED residential SSLs."

**NMED Comment:** In point of fact, Arsenic was found to exceed NMED residential SSLs in samples, 017-51-2, 024-51-1, 024-51-2, 024-52-2, 027-52-2, 028-51-1, 915-51-1, and 916-51-1. NMED understands that the Permittees intend to clean close this OD unit; therefore, any contamination present at the site will be removed during the clean-closure process and does not require additional sampling and characterization at this time.

**2) Section 3.2, Data Validation, page 3-1-3-2:**

**NMED Comment:** The Permittees must submit the contract laboratory reports, preferably electronically (e.g. pdf), to NMED within 60 days of receipt of this letter for review. NMED cannot evaluate the accuracy of the data validation methods without reviewing the laboratory reports.

**3) Section 4.2, Recommendations, page 4-2:**

**Permittees' Statement:** "Continued operation in accordance with the Permit and associated modifications appears appropriate based on the compliance sampling results." "The current Operational permit will expire in July 2005. Fort Bliss is not going to renew the Operational Permit."

**NMED Comment:** As stated in the second part of comment #1, NMED understands that the Permittees intend to clean close the OD unit; therefore the Operating Permit for the unit will not be renewed. However, the Permittees must submit a revised Closure Plan with their new Corrective Action Permit Application.

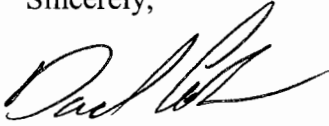
**4) Appendix B, Data Validation Narrative Report:**

**NMED Comment:** See comment #2 above.

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If you have any questions regarding this letter, please call me at (505) 428-2553.

Sincerely,

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

David Cobrain  
Staff Manager  
Permits Management Program

DC:kc

cc: J. Bearzi, NMED HWB  
J. Kieling, NMED HWB  
K. Chamberlain, NMED HWB  
L. King, EPA Region 6 (6PD-N)  
David Dodge, Fort Bliss  
Pat McKernan, Fort Bliss

File: Reading File & FB 2005 File, FB 05-001