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RON CURRY
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July 24, 2006

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

**SUBJECT: NOTICE OF DEFICIENCY
RCRA FACILITY INVESTIGATION (RFI) WORK PLAN
ORO GRANDE LANDFILL/SWMU-25/FTBL-14
FORT BLISS, NEW MEXICO
EPA ID NO. NM4213720101-01
HWB-FB 06-001**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) received Ft. Bliss's *Final RCRA Facility Investigation (RFI) Work Plan for Oro Grande Landfill (SWMU-25/FTBL-14)*, dated December 2005. NMED has performed a technical review of the RFI Work Plan in accordance with 20.4.2.200.A(7) NMAC, and has determined that the RFI Work Plan for the Oro Grande Landfill (SWMU 25/FB-14) is technically deficient. Fort Bliss must respond to the comments provided in this letter and submit a revised work plan within 90 days of receipt of this letter. In addition, Fort Bliss must include a response letter that describes where revisions have been made, cross-referencing the numbered comments below, and provide an updated CD-ROM.

Comment 1 Section 1-2, p. 1-2, paragraph 5

The RFI Work Plan states, "Should the RFI indicate compliance with [this] closure criterion, NMED may approve the RFI and grant a No Further Action (NFA) for the landfill."

Once the revised RFI Work Plan has been approved and then implemented, Fort Bliss must submit to NMED an RFI Report in order to comply with its permit. NMED will then review the

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RFI Report to determine whether Fort Bliss has adequately characterized SWMU 25 or whether additional investigation and/or corrective measures are required. If further investigation or other corrective action is not required, NMED will recommend that Fort Bliss submit a petition for a Corrective Action Complete determination. NMED will then respond to the petition as appropriate.

Fort Bliss must revise the language of the Regulatory Framework Section to reflect an understanding of these requirements.

Comment 2 Section 2.2, p. 2-1, paragraph 5

The RFI Work Plan states, "Based on the landfill dimensions reported by TPG (1997), the landfill capacity would be approximately 18,000 cubic yards. Based on Wagner (2000), approximately 600 cubic yards of waste material was present in the landfill at the end of operation in 1994."

In paragraph 4 of the same Section, the dimensions reported by TPG (1997) are 370 feet long by 20 to 65 feet wide by 9 to 12 feet deep. Using the maximum length, width, and depth, the capacity of the landfill would not exceed $(370 \text{ feet} \times 65 \text{ feet} \times 12 \text{ feet}) \times (1 \text{ cubic yard}/27 \text{ cubic feet}) = 10,688$ cubic yards. Using the mean width and mean depth, the capacity would equal approximately 6,100 cubic yards.

Using the dimensions reported by Wagner (2000), the landfill capacity would be $(2 \text{ trenches}) \times (120 \text{ feet long} \times 22 \text{ feet wide} \times 15 \text{ feet deep}) \times (1 \text{ cubic yard}/27 \text{ cubic feet}) = 2,933$ cubic yards.

Fort Bliss must revise Section 2.2 of the RFI Work Plan to accurately state how the two volumes of waste were derived, even if they are not in concurrence.

Comment 3 Section 2.2, p. 2-4, paragraph 3

The RFI Work Plan states that "Tar material was disposed of to the ground surface in an arroyo to the west of the landfill." The tar was collected and disposed of in a permitted landfill in 2004.

The RFI Work Plan (pages 4 and 5) states that soil samples will be collected at a depth interval of 8 – 10 feet below ground surface (bgs) from the proposed soil borings at the Tar Material Area. If the tar material was disposed of on the ground surface, then the ground surface within the Tar Material Area needs to be sampled. NMED approves the target compounds listed in Table 4-1 for sample analysis.

Fort Bliss must revise the work plan to propose collection of a soil sample from each boring in the former Tar Material Area from native soil at the 0 – 1 foot interval.

Comment 4 Section 4.1, p. 4-1

The RFI Work Plan addresses the potential risks to human and ecological receptors, which was

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not included in the 2004 version of the work plan; however, Comment 13 of the 2004 NOD directs Fort Bliss to revise its RFI Work Plan to include a Screening-Level Ecological Risk Assessment (SLERA) of SWMU 25 using NMED's current ecological risk assessment guidance. The RFI Work Plan identifies the exclusion of a SLERA as a data gap (p. 3-7) and further proposes that an exclusion criteria checklist will be completed prior to determining whether or not a SLERA is warranted.

NMED has determined that this is a reasonable compromise, provided that the exclusion criteria checklist is performed and that a SLERA is likewise performed, if necessary.

Comment 5 Section 4.1, p. 4-1

One of the proposed objectives of the Field Sampling Plan is to determine whether Contaminants of Concern (COCs) have been released and are present in soils at concentrations greater than residential New Mexico Soil Screening Levels (NMSSLs). Vertical soil borings advanced outside the perimeter of suspected backfill may not be adequate to determine whether COCs have been released to soils beneath the landfill trench.

In order to adequately achieve this objective, Fort Bliss must sample the soil directly underneath the debris trench as described by the hatched area in Figure 4-1 of the RFI Work Plan. Fort Bliss must revise its Field Sampling Plan to include advancing the proposed landfill borings as close to the landfill as possible.

In addition, a minimum of two angled soil borings on the east side and one angled soil boring on the west side of the debris trench must be advanced to minimum depths of 10 feet below, and laterally a minimum of 10 feet underneath the debris trench.

Soils samples must be collected from all soil borings at the surface and at five foot intervals thereafter, to the maximum depths of the borings.

Comment 6 Section 4.4.1, p. 4-5, paragraph 3

The revised RFI Work Plan does not adequately address Comment 30 of the December 2004 NOD regarding the number and depth of soil borings except for the requirement that samples be collected every five feet from the ground surface to the total depth (30 ft bgs) in each boring.

NMED accepts the proposed depths of 0'-2', 13'-15', and 28'-30' bgs for collection of soil samples to be submitted for laboratory analysis; however, Fort Bliss must collect samples for field screening at the five foot intervals as directed for each of the five shallow soil borings, and, at a minimum, for the first 40 feet of the deep boring. If field screening evidence of contamination is observed in any of the samples, then those samples also must be submitted for laboratory analysis.

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Comment 7 Section 4.4.7, p. 4-15

The RFI Work Plan states that both soil cuttings and decontamination water will be staged in 55-gallon drums and that if residential NMSSLs are exceeded then Fort Bliss DOE will be notified to arrange alternative disposal procedures. NMSSLs do not apply to aqueous samples. Fort Bliss must compare analytical results from the decontamination water to the lower of New Mexico Water Quality Control Commission (WQCC) Regulation standards and EPA Maximum Contaminant Levels (MCLs).

Prior to disposal of the Investigation Derived Waste (IDW), Fort Bliss must submit a letter to NMED for approval that includes the IDW characterization results and the proposed disposal alternatives for the soil cuttings and decontamination water. NMED will respond as appropriate.

If you have any questions regarding this letter, please call Dave Cobrain of my staff at (505) 428-2553.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB: dc

cc: John Kieling, NMED HWB
Cheryl Frischkorn, NMED HWB
D. Cobrain, NMED HWB
L. King, EPA Region 6 (6PD-N)
Ron Baca, Fort Bliss

File: Reading File & Ft. Bliss 2006 File
HWB-FB-06-001