



BILL RICHARDSON
GOVERNOR

FB 04
State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us

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RON CURRY
SECRETARY

CERTIFIED MAIL RETURN RECEIPT REQUESTED

August 16, 2006

Keith Landreth
Director of Environment
Department of the Army
Headquarters, U.S. Army Garrison Command
1773 Pleasonton Road
Fort Bliss, Texas 79916-6812

**RE: COMMENT RESPONSE
CLOSURE CERTIFICATION REPORT
MCGREGOR RANGE OPEN, OPEN DETONATION (OD) UNIT
EPA ID NO. NM4213720101
FB-06-002**

Dear Keith Landreth:

The New Mexico Environment Department (NMED) has completed its review of Fort Bliss's (FB) 2005 *Closure Certification Report, McGregor Range Open Detonation (OD) Unit Comment Response Letter*, dated June 15, 2006. NMED has determined that Fort Bliss must address the following comments in order to achieve clean closure of the OD Unit.

Specific Comment 1:

NMED's original Notice of Deficiency (NOD) letter requested a table that clearly shows which site data were used for comparison to the New Mexico Soil Screening Levels (SSLs) and that the corresponding risk/hazard levels be included in the report. The response indicated that since the data were being compared to the NMSSLs, which are risk-based numbers, the cumulative risk/hazard does not require calculation.

This response is not adequate. While individual constituents are compared to the NMSSLs and, on an individual basis, the residual concentrations may be less than the NMSSLs, the cumulative risk and hazard must also be evaluated when making risk-based decisions. It is possible that,

individually, the risk/hazard levels are acceptable, but when cumulative risk/hazard is assessed, the target risk level (1E-05) and hazard level (1.0) may be exceeded.

Using the data provided in Table C-3 with the response to comment package, the associated risk and hazard were estimated. Arsenic is the only carcinogen. As shown in the table below, using the maximum detected concentrations, both the pre-remediation and the post-remediation risks are above the New Mexico target risk level of 1E-05. Applying the 95% upper confidence level of the mean (95% UCL) for the pre-remediation data also results in a risk level above the target risk level. However, the post-remediation 95% UCL results in a cumulative risk (9.38E-06) that is within the target risk level.

For the noncarcinogenic constituents of concern, both the individual hazard quotients (HQs) and the overall hazard index (HI) were below the target level of 1.0. Please note that New Mexico has released the 2006 version of the New Mexico SSLs. The 2006 values were compared to the data applied in the closure certification report. New NMSSLs are available for barium and cadmium. However, the use of the 2006 data do result in either a HQ or the HI being greater than the target level of 1.0.

Table 1. Estimation of Cumulative Risk and Hazard.

Metal	Minimum (mg/kg)	Maximum (mg/kg)	95% UCL	NM SSL residential soil (ppm)	C/NC	Risk (Max)	Risk (95% UCL)	Hazard
antimony	1.01	0.974		31.3	NC			0.031118
arsenic - pre	0.602	20.3	4.83	3.9	C	5.21E-05	1.24E-05	
arsenic -post	0.602	6.37	3.66	3.9	C	1.63E-05	9.38E-06	
barium	15	139		5450	NC ^a			0.025505
beryllium	0.242	0.677		156	NC			0.00434
cadmium	0.097	6.48		74	NC ^b			0.087568
chromium	1.35	13.5		100000	NC			0.000135
cobalt	1.03	48.1		1520	NC			0.031645
copper	2.46	443		3130	NC			0.141534
iron	7920	13900		23500	NC			0.591489
lead	1.58	44.3		400				
mercury	0.02	0.032		23.5	NC			0.001362
potassium	707	5920						
selenium	1	0.638		391	NC			0.001632
silver	0.505	1.35		391	NC			0.003453
strontium	71.8	376		46900	NC			0.008017
zinc	6.86	179		23500	NC			0.007617
					Total	1.63E-05	9.38E-06	0.935413

^a Note that the 2006 NM SSL for barium has changed, the current (2006) value is 1.56E+04 mg/kg. Using the 2006 datum results in a HQ of 8.91E-3.

Metal	Minimum (mg/kg)	Maximum (mg/kg)	95% UCL	NM SSL residential soil (ppm)	C/NC	Risk (Max)	Risk (95% UCL)	Hazard
^b Note that the 2006 NM SSL for cadmium has changed, the current (2006) datum is 39 mg/kg. Using the 2006 datum results in a HQ of 0.166.								

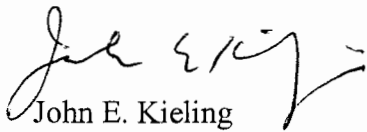
In conclusion, while the response to the comment was not adequate, as overall risk/hazard were not evaluated, based upon the above assessment and upon completion of the hot spot removal for arsenic, the cumulative risk and hazard are within the New Mexico target levels of 1E-05 and 1.0, respectively.

Specific Comment Nos. 5 through 7: NMED's original NOD Comments 5-7 indicated that the calculation of the 95% UCL was not conducted properly, and that the 95% UCLs must be revised to reflect the proper distribution of the data sets. FB's response to the comments indicated that in lieu of re-calculating the 95% UCLs, it is requested that the 95% UCL be removed from the closure report. The use of the 95% UCL results in a less conservative estimation of risk/hazard than the use of the maximum detected concentration. While the responses do not state what concentrations (instead of the 95% UCL) will be used to compare to the NMSSLs, it was assumed that the maximum detected concentration would be applied. In comparing the maximum detected concentration for mercury, selenium, and silver to the respective NMSSLs, the resulting HQs are less than 1.0. To clarify the request in the response, the maximum detected concentration may be used in lieu of the 95% UCL. No response is necessary.

The Permittee must respond to these comments no later than 30 days of receipt of this letter. Upon NMED's review of FB's response to the comments established in this letter, NMED will determine the status of this site.

If you have any questions concerning this letter, please contact me at 505-428-2552.

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK:td

Keith Landreth
August 16, 2006
Page 4

cc: D. Cobrain, NMED HWB
T. Diaz, NMED HWB
C. Frischkorn, NMED HWB
L. King, EPA Region 6 (6 PD-N)
R. Baca, Fort Bliss DoD
P. Mckernan, Fort Bliss DoD
File: FB 2006 and Reading
HWB-FB-06-002