



BILL RICHARDSON
GOVERNOR

FB06
State of New Mexico
ENVIRONMENT DEPARTMENT

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ENTERED



RON CURRY
SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 14, 2006

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

**RE: NOTICE OF DEFICIENCY
INVESTIGATION WORK PLAN
INACTIVE MACGREGOR RANGE OPEN DETONATION SITE
SWMU-20/FTBL-015
FORT BLISS, NEW MEXICO EPA ID NO. NM4213720101-01
HWB-FB 06-007**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has reviewed the Department of the Army's (Permittee) *Work Plan Addendum, Inactive McGregor Range Open Detonation Site*, dated September 25, 2006. The Permittee's *January 2005 Response to Notice of Deficiency (NOD) Letter* dated November, 24, 2004 was also considered during this technical review. The NOD was based on a technical review of the Permittee's *Final Voluntary Corrective Action (VCA) Report for the Inactive MacGregor Range Open Detonation (SWMU-25/FTBL-14)*. The work plan describes activities that address data gaps at the site. The Permittee must address the following comments within 90 days of receipt of this letter and before the commencement of work at the site.

COMMENT 1

The Permittee states on page 2 of the work plan addendum that additional surface soil samples (0 to 6 inches below the ground surface) will be collected and analyzed.

The Permittee must revise the work plan to state that subsurface soil samples will be collected for

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chemical analysis beneath any remaining debris at Solid Waste Management Unit (SWMU) 20. If needed, additional subsurface soil samples must be collected and analyzed to define any releases from SWMU 20. NMED recommends the use of angled borings to investigate directly beneath trenches and mounds without drilling through the waste.

COMMENT 2

In the section titled "Scrap Metal Collection", the Permittee states that materials of significant size present at ground level will be removed, as practicable, and to the extent allowed by the allocated budget.

The Permittee must define 'materials of significant size' in the work plan. In addition, if the Permittee decides to leave waste in place, the SWMU cannot be clean closed and 'corrective action complete without controls' status cannot be attained.

COMMENT 3

The Permittee states in the Background Soil Sampling section of the work plan that a separate work plan for conducting background soil sampling at McGregor and Doña Ana Ranges was prepared and submitted in December 2005.

The Permittee cannot reference the results of this soil background study for the McGregor and Doña Ana Ranges because the report has not been approved by NMED.

COMMENT 4

The Permittee states that soil samples will be homogenized in a disposable aluminum pan or bowl. Because these samples will be analyzed for metals, the use of aluminum sampling equipment could influence the sampling result and should not be used.

The Permittee must revise the plan to exclude the use of aluminum sampling equipment. NMED recommends the use of decontaminated stainless steel equipment.

COMMENT 5

On page 4 of the work plan, the Permittee states that NMED screening levels will be used to set maximum sample quantitation limits for laboratory analyses.

The Permittee must ensure that the laboratory quantitation limits are below residential New Mexico Soil Screening Levels (NMSSLs) and residential Region 6 Human Health Medium-Specific Screening Levels for soil. The recommended quantitation limits should be no more than

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20% of the applicable screening levels.

COMMENT 6

The work plan does not include a description of a full-scale, SWMU-wide unexploded ordnance (UXO) clearance. Previous UXO surveys appear to have been conducted for clean up and the safety of personnel entering the SWMU area during investigation activities and not for closure of the site.

The Permittee must revise the work plan to include a description of the activities required to conduct a full-scale, SWMU-wide UXO clearance.

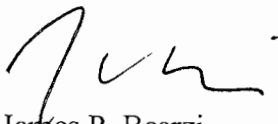
COMMENT 7

The work plan describes geophysical investigative activities to be conducted at the location of the former trench.

The Permittee must revise the plan to state that all areas not previously surveyed using geophysical methods will be surveyed during this investigation. The Permittee must identify all trenches and debris mounds and also determine the nature and extent of the debris in all trenches and mounds at the site.

If you have any questions regarding this letter, please call Cheryl Frischkorn at (505) 428-2550.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:caf

cc: J. Kieling, NMED HWB
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