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FB07
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ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 9, 2007

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

**RE: NOTICE OF DEFICIENCY (NOD)
WORK PLAN FOR SOLID WASTE MANAGEMENT UNIT (SWMU)
27B (DOÑA ANA OXIDATION LAGOON) &
SWMU 76 (MEYER OXIDATION LAGOON)
FORT BLISS, NEW MEXICO, EPA ID# NM4213720101-01**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has received the Department of the Army's (Permittee) May 25, 2007 *Work Plan for SWMUs 27B (Doña Ana Oxidation Lagoon) and 76 (Meyer Oxidation Lagoon)*. This work plan was prepared and submitted in pursuant to NMED's Settlement Agreement, dated January 19, 2006.

NMED has determined that several changes must be made before an approval can be granted to the Permittee for the work plan. The Permittee must submit a revised work plan within 60 days of receipt of this letter. In addition, the Permittee must include a response letter that indicates precisely where revisions have been made that address the comments of this letter, cross-referencing NMED's numbered comments.

COMMENT 1

The work plan does not describe the locations of the proposed monitoring wells to be installed in the regional aquifer at each oxidation lagoon. Monitoring well location descriptions are required to determine if the proposed locations are appropriately located downgradient of the oxidation

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lagoons.

The Permittee must revise the work plan to include maps and descriptions of the proposed monitoring well locations.

COMMENT 2

The Permittee states in Section 2.1 (Well Installation) that the monitoring wells will be installed using conventional air rotary or mud rotary drilling methods.

The work plan must be revised to exclude mud rotary as a drilling method. The use of either hollow stem auger or air rotary drilling methods is required, unless the Permittee receives prior approval for an alternative method.

COMMENT 3

The Permittee states in Section 2.1 (Well Installation) that field screening and lithologic information collected from the soil and rock cores will be used to construct geologic boring logs, with the understanding that only the bottom intervals of the boring will be described.

The Permittee must revise the work plan to state that the entire length of each boring will be logged and described.

COMMENT 4

The Permittee describes in Section 3 (Investigation Derived Waste) that drilling cuttings, equipment rinsate water, and excess groundwater will be discharged directly into the respective oxidation lagoon. Once inside the oxidation lagoons, a composite sample will be collected for confirmation purposes.

The Permittee must revise the work plan to state that all water (purge and development water, equipment rinsate water) and drilling cuttings will be contained and sampled to determine if they contain contaminants at concentrations that require alternate disposal before they are placed into an oxidation lagoon. The Permittee may place the drill cuttings into the oxidation lagoons only if there are no contaminants present at concentrations greater than residential New Mexico Soil Screening Levels (NMSSLs). If the analysis determines that the drill cuttings contain contaminant concentrations greater than residential NMSSLs, then the drill cuttings must be disposed of properly. Any purge or development water containing contaminants at concentrations greater than the New Mexico Water Quality Control Commission (WQCC) human health standards, drinking water maximum contaminant levels (MCLs), and EPA Region VI Human Health Medium-Specific Screening Levels (HHMSSL) for tap water, must be properly disposed of off site.

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If you have any questions regarding this letter, please contact Cheryl Frischkorn at (505) 476-6058.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:caf

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
C. Frischkorn, NMED HWB
Ron Baca, Ft. Bliss
Elza Cushing, Ft. Bliss
File: FB 2007 and Reading File