



GOVERNOR

FB07
State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 476-6000
Fax (505) 476-6030
www.nmenv.state.nm.us



RON CURRY
SECRETARY

CINDY PADILLA
DEPUTY SECRETARY

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 1, 2007

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

**RE: APPROVAL WITH DIRECTION
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) April 19, 2007 *Response to Notice of Deficiency (NOD) and Work Plan Addendum, Work Plan for Solid Waste Management Units SWMU 27B (Doña Ana Oxidation Lagoon) and 76 (Meyer Oxidation Lagoon)*. The work plan and subsequent addendum were prepared and submitted pursuant to NMED's Settlement Agreement, dated January 19, 2006.

NMED hereby approves, with the conditions described in this letter, the May 24, 2006 Work Plan and the proposed modifications to the Work Plan outlined in the April 19, 2007 Work Plan Addendum. The Permittee must implement the modifications to the work plan described in this letter and document them in a report to be submitted to NMED after the first ground water sampling event described in Section IV.G.3 of the January 2006 Settlement Agreement. The conditions are listed below.

If Baroid® EZ-MUD is used, any residues of this polymer surrounding the well have the potential to impact ground water analysis of volatile organic compounds (VOCs), semi-volatile

Keith Landreth
May 1, 2007
Page 2 of 2

organic compounds (SVOCs) and redox-sensitive metals. The polymer can be subject to microbial degradation, producing anaerobic conditions around the well. Anaerobic conditions are likely to induce microbial and geochemical transformations of many VOCs and SVOCs, as well as redox-sensitive metals. As a result of water passing through the impacted zone, detected concentrations of these compounds in ground water samples may be lower than the actual concentrations in the formation water. The Permittee must aggressively develop the wells to ensure the natural hydraulic conductivity of the aquifer is restored and all introduced materials, including drilling mud, are removed. The Permittee must utilize a purge-sampling technique to collect ground water samples. If these wells fail to yield representative ground water samples, the Permittee may be required to drill additional wells.

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

Sincerely,



John E. Kieling
Manager
Permits Management Program

JEK:caf

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