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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

May 4, 2007

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

**RE: NOTICE OF DEFICIENCY
SAMPLING AND ANALYSIS PLAN
McGREGOR RANGE AND DOÑA ANA RANGE SWMU SITES
FORT BLISS, NEW MEXICO, EPA ID# NM4213720101-01
HWB-FB-06-003**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) received the Department of the Army's (the Permittee) *Sampling and Analysis Plan, McGregor Range and Doña Ana Range SWMU Sites*, dated December 2005. After NMED received payment in April 2007, NMED reviewed the document and found it to be technically deficient. The Permittee must submit a revised plan by September 28, 2007. The Permittee must include with the revised work plan a response letter that details where revisions have been made, cross-referencing NMED's numbered comments. The Permittee must revise the work plan as follows:

COMMENT 1

The work plan focuses solely on surface soil background values. Many samples collected for investigation and remediation are collect at depth.

The Permittee must revise the plan to include activities for the establishment of background concentrations in subsurface soils (> 0.5 feet below ground surface), in addition to surface soils (0 to 0.5 ft interval). Soil from specific horizons must be compared to background concentrations calculated from the same or comparable soil horizon.

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COMMENT 2

The Permittee states that the background data obtained from this study may also be used in the future for the assessment and closure of other sites at Ft. Bliss.

If the Permittee plans to employ the background concentrations derived from this study to SWMUs other than the six mentioned in this work plan, additional background soil samples must be collected and analyzed from a larger area that is more representative of the variety of soil types at Ft. Bliss. Otherwise, the Permittee must remove all references to other SWMUs and confine this background study to the McGregor and Doña Ana Range SWMUs.

COMMENT 3

The Permittee does not provide a discussion relating to how non-detects will be addressed, including the possible effect on the determination of the upper confidence limit (UCL) when non-detects are censored.

The Permittee must revise the sampling and analysis plan to include a discussion of the treatment of non-detects when computing the background reference values. In addition, The Permittee must clarify how outliers or anomalies, if encountered, will be addressed.

COMMENT 4

The Permittee states in the Section 3.2.3 (Analytical Requirements) that the soil samples will be analyzed for the eight RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) and aluminum. The metals that are proposed for the background assessment appear to be based on the results of previous investigations at the six SWMUs.

Because the SWMUs may have released inorganic constituents other than the eight RCRA metals, The Permittee must revise their sampling strategy to specify that the soil samples will be analyzed for all inorganic constituents listed in 40 CFR 264 appendix IX. These data may be needed for future SWMU closures.

COMMENT 5

The project schedule presented in Section 2.5 is no longer current.

The Permittee must provide an updated schedule in the revised sampling and analysis plan. NMED recommends that schedules be relative (e.g., 30 days after approval) rather than absolute (e.g., on August 12, 2006).

COMMENT 6

The first paragraph in Section 1.1 (Purpose) excludes SWMU 27 from the list of sites to be addressed in the plan.

The Permittee must revise the plan to include SWMU 27 in this list.

COMMENT 7

The Permittee states in Sections 3.2.2 (Sampling Methods and Field Screening Requirements) and 4.1 (Sampling Methods) that soil samples may be homogenized in a disposable aluminum pan or stainless-steel mixing bowl. Because one of the objectives is to establish a background concentration for aluminum, 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.

COMMENT 8

The bioavailability of aluminum is dependant on other physical or chemical parameters, such as pH. It is unclear if the Permittee plans on collecting parameters such as pH.

The Permittee must revise their plan to include collecting measurements for pH and other parameters, as appropriate, that could influence the bioavailability of aluminum.

COMMENT 9

The symbols in the legends on Figures 1-3 and 3-1 do not match the symbols shown on the maps. The legend included on Figure 3-3 indicates that proposed background locations are represented as a black dot; however, there are no black dots on the figure.

The Permittee must revise the plan and modify the figures accordingly.

COMMENT 10

The Permittee states in Section 3.2.4 (Quality Assurance Sample Collection Frequency) that "samples will be collected as split samples of the soil samples, according to procedures described above." A description of sample collection procedures is provided in Section 3.2.2 (Sampling Method and Field Screening Requirements), but the procedures do not describe the process for collecting a split sample.

The Permittee must revise the plan to include a description of the procedures that will be used for collecting duplicate soil samples.

COMMENT 11

The last paragraph of Section 3.3 (Calculation of Background Concentrations) indicates that the calculated background concentrations will be compared to the on-site concentrations. However, the report does not clarify how this comparison will be conducted. For example, will the 95% UCL for the site data be compared to established background reference value (95% UCL for background) or will the site maximum be compared to background? In addition, the text states that if the site concentration exceeds the calculated site background reference value, then the chemical will be treated as site-related. It is not apparent whether a site attribution analysis will be conducted comparing data sets (e.g., using the Wilcoxon Rank Sum Test) to aid in determining whether the site concentrations fall within the background distribution.

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The Permittee must revise the plan to clarify how site data will be compared to the background reference value.

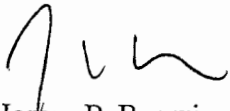
COMMENT 12

Section 4.8 (Chain-of-Custody Records) describes the chain of custody procedures for the sampling event. The Permittee does not mention in this section the documentation of when (time and date) and by whom the samples were relinquished.

The Permittee must revise this section to state that the time, date, and signatures of those involved in sample custody will be recorded on the chain-of-custody forms.

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
C. Frischkorn, NMED HWB
Ron Baca, Ft. Bliss
Elza Cushing, Ft. Bliss
File: ~~EP-2007~~ and Reading File
HWB-~~EP-06-003~~