



GOVERNOR

FB07
State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
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RON CURRY
SECRETARY

CINDY PADILLA
DEPUTY SECRETARY

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 12, 2007

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

RE: APPROVAL OF POST CLOSURE CERTIFICATION REPORT FOR McGREGOR RANGE CAMP LANDFILL (SOLID WASTE MANAGEMENT UNIT NO. 18) FORT BLISS, NEW MEXICO, EPA ID# NM4213720101-01 HWB-FB-06-006

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has received the United States Department of the Army's (Permittee's) *Post Closure Certification Report for McGregor Range Camp Landfill (Solid Waste Management Unit No. 18), Fort Bliss Military Reservation*, dated March 2005.

On October 8, 2004 NMED approved with modifications a Voluntary Corrective Action Report submitted by the Permittee for Solid Waste Management Unit (SWMU) 18 (dated February 22, 2002). The Permittee did not submit the closure plan for approval as clearly stated in NMED October 8, 2004 approval letter, "*Fort Bliss shall submit a plan for closing SWMU-18 for NMED's review and approval.*" The Permittee should note that NMED's directions were not followed and the installation of an alternative cover at the landfill was conducted at risk by the Permittee.

The Permittee used the Hydraulic Evaluation of Landfill Performance (HELP) model to demonstrate compliance with of the New Mexico Solid Waste Regulations (20 NMAC 9.1.502.A.2). The annual percolation/leakage through layer 2 calculated using the HELP model for NMED prescribed cover (18 inch thick) was 0.219, and for the alternative cover (30 inch thick) was 0.154, which is less than the value calculated for the prescribed cover. The Permittee

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used the precipitation data from the wettest 5 consecutive year period to input into the HELP model, as required by the regulations. However, it should be noted that if the highest values (for 1984 for both prescribed and alternative cover) and the lowest values (1987 for prescribed and 1988 for alternative cover) were excluded, the leakage through the alternative cover will be 0.0277 that is higher than the 0.0019 value for the prescribed cover.

The Permittee is proposing not to have a monitoring plan for methane gas because the risk to human health and the environment as a result of gas generation at the landfill is de minimus. The Permittee has provided several arguments to justify not monitoring for methane gas; there is low precipitation and high evaporation at the site, vegetative matter was not disposed at the site and the waste disposed at the landfill was burned at regular intervals. NMED concurs with the Permittee that methane gas will most likely not be generated at the site and the design of the cap will not prevent it from migrating vertically or laterally, if small quantities are generated. The Permittee has not proposed leachate monitoring for the site. An impermeable layer was not installed beneath the landfill. The leachate, if generated will not collect beneath the landfill.

The Permittee is requesting exemption for monitoring groundwater during the post closure care period based on the following:

- Regional groundwater is at depths greater than 350 feet below ground surface.
- Presence of a dry clay unit at about 58 feet below ground surface.
- Average annual rainfall in the area is approximately 15.5 inches and an average annual evaporation rate is 105 inches.
- Data collected from the site indicates that the highest detected concentrations of inorganic and organic chemicals are below their respective NMED risk based screening levels. Hazardous Index was calculated at 0.47.
- No leachate has been observed at the site during investigations.
- Nearest water well is located five miles west of the site.

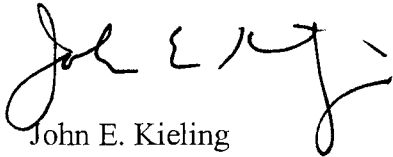
NMED concurs with the Permittee that the site does not require methane gas, leachate, and groundwater monitoring during the post closure care period. NMED hereby approves the Post Closure Certification Report for McGregor Range Camp Landfill, SWMU 18.

The Permittee is required to conduct post closure monitoring at the site. The post closure care required at the site includes maintenance of the cover, drainage system and vegetation. The Permittee must conduct annual inspections of the site and submit photographs and description of the site conditions to NMED annually. NMED will review the monitoring requirements for post closure care at the end of the proposed 15 year inspection period to determine if post closure care should be discontinued at that time.

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If you have any questions, please contact Neelam Dhawan of my staff at (505) 476-6040.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a long horizontal stroke at the end.

John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc: J. Bearzi, NMED HWB
D. Cobrain, NMED HWB
C. Frischkorn, NMED HWB
N. Dhawan, NMED HWB
Ron Baca, Ft. Bliss
Elza Cushing, Ft. Bliss
File: Reading File and FB 2007 (SWMU 18)