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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 30, 2007

Mr. Keith Landreth
Director of Environment
US Army Garrison Fort Bliss
Attn: ATZC-DOE (Landreth)
Bldg. 624
1733 Pleasanton Road
Fort Bliss, TX 79916-6812

RE: APPROVAL OF POST CLOSURE CERTIFICATION REPORT FOR DOÑA ANA RANGE CAMP LANDFILL (SOLID WASTE MANAGEMENT UNIT NO. 27), FORT BLISS, NEW MEXICO, EPA ID#NM4213720101-01 HWB-FB-06-005

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 Doña Ana Range Camp Landfill (Solid Waste Management Unit No. 27), 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) 27, dated February 2002. The Permittee did not submit the closure plan for approval as stated in NMED's October 8, 2004 approval letter, "Fort Bliss shall submit a plan for closing SWMU-27 for NMED's review and approval." The Permittee should note that NMED's directions were not followed and the installation of an alternate 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 the New Mexico Solid Waste Regulations. The average annual percolation/leakage through layer 2, calculated using the HELP model for the NMED-prescribed

cover (18 inches thick), was 0.219 inches and for the alternate cover (30 inches thick plus six inches of topsoil) was 0.154 inches, which is less than the value calculated for the prescribed cover. The Permittee used the precipitation data from the five wettest consecutive year period for input into the HELP model as required by applicable regulations and guidance. However, it should be noted that if the highest values (1984 for both prescribed and alternative covers) and the lowest values (1987 for the prescribed cover and 1988 for the alternative cover) were excluded, the average annual leakage through the alternative cover (0.028 inches) is an order of magnitude higher than the value for the prescribed cover (0.002 inches).

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:

- The design cover system does not provide a significant barrier to prevent vertical migration of gas and direct atmospheric venting;
- There are no underground structures or utilities near the capped areas that could receive and transmit migrating gases;
- The nearest inhabited structures are greater than one-mile from SWMU No. 27;
- The site experiences low precipitation and high evaporation rates;
- Wastes were historically burned at the site to reduce waste volumes; and,
- Landfill gasses have never been detected during gas sampling and monitoring surveys at SWMU No. 27.

The Permittee has not proposed leachate monitoring at the site. An impermeable layer was not installed beneath the landfill. Leachate, if generated, will not collect beneath the landfill.

The Permittee has requested an exemption for monitoring groundwater during the post-closure care period for the site based on the following:

- Regional groundwater is present at depths approximately 330 feet below ground surface (bgs);
- A dry clay unit is present beneath the site at a depth of approximately 115 feet bgs indicating leachate has not migrated to the clay unit;
- Average annual area rainfall is approximately 15.5 inches and the average area evaporation rate is 105 inches;
- Data collected from the site indicates the highest detected concentrations of organic and inorganic constituents are below their respective NMED risk-based screening levels and the calculated risk ratio was 0.83, indicating that concentrations of detected constituents are unlikely to result in adverse health impacts or affect groundwater above New Mexico water quality standards; and,
- The nearest water supply well is located 1.5 miles from the site

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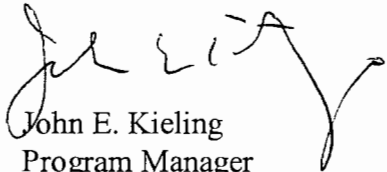
NMED concurs with the Permittee that the site does not require methane gas, leachate and groundwater monitoring during the post-closure period. NMED hereby approves the Post Closure Certification Report for the Dona Ana Range Camp Landfill, SWMU #27.

The Permittee has proposed post-closure site inspections at least twice per year. The inspections shall be performed before and after the wet summer season and after each major rainfall event that produces more than one inch of rain. Post-closure reports shall present the results of the inspections and summarize maintenance performed. Site inspections must include observations of the final cover and side slopes, the surface water drainage system and vegetative cover condition. Any damage to cover material or side slopes must be noted and repaired. Capped areas experiencing subsidence must be re-graded with additional soil as needed to maintain site drainage.

Site inspection summaries, including photographs and descriptions of site conditions shall be submitted to NMED annually by December 31st of each year. NMED will review the monitoring requirements for post-closure care at the end of the post-closure care inspection period to determine if post-closure care should be discontinued at that time.

If you have any questions, please contact Daniel Comeau of my staff at (505) 476-6050.

Sincerely,



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

cc: J. Bearzi, NMED HWB
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File: Reading File and FB 2007 (SWMU 27)