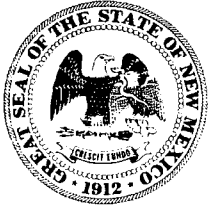


FB 07

ENTERED



BILL RICHARDSON  
Governor

DIANE DENISH  
Lieutenant Governor

NEW MEXICO  
ENVIRONMENT DEPARTMENT

*Hazardous Waste Bureau*

2905 Rodeo Park Drive East, Building 1

Santa Fe, New Mexico 87505-6303

Phone (505) 476-6000 Fax (505) 476-6030

www.nmenv.state.nm.us



RON CURRY  
Secretary

CINDY PADILLA  
Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

December 20, 2007

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

**RE: NOTICE OF DISAPPROVAL  
WASTE WATER SAMPLING RESULTS REPORT FOR MARCH 2007  
SEMI-ANNUAL WASTEWATER COMPLIANCE SAMPLING FOR THE NEW  
MEXICO RANGE OUTFALLS  
FORT BLISS  
EPA ID NO. NM4213720101  
HWB-FB-07-002**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has reviewed Fort Bliss's (the Permittee) June 2007 document *Waste Water Sampling Results Report for March 2007, Semi-Annual Waste Water Compliance Sampling for the New Mexico Range Outfalls at Fort Bliss, Texas* (Report). In the process of evaluating this document, NMED also evaluated the Permittee's *Final Waste Water Flow Monitoring Results Report for March 2007* (April 2007), *Final Waste Water Flow Monitoring Results Report for April 2007* (May 2007), *Final Waste Water Flow Monitoring Results Report for May 2007* (June 2007), and *El Paso Water Utilities Industrial Pretreatment Program Regulation No.9 and Local Limits*. NMED has determined that the Report is technically deficient. While NMED does not require resubmission of the Report, the Permittee

Mr. Landreth  
December 20, 2007  
Page 2

must respond to the comments provided in this letter.

**Comment 1**                          **Section 1.2**

The Permittee states in Section 1.2 (Field Investigation and Reporting) on page 1, lines 24-26 "....Four rounds of sampling, analysis and reporting are required under this contract...."

NMED believes that the term "contract" as used in this text refers to the NMED Settlement Agreement signed in January 2006. Settlement Agreement states that "Semi-annual sampling of influent content entering SWMUs 27B and 76 will incorporate the target analyte list for metals (TAL), EPA method 8260 for VOCs and EPA method 8270 or 8310 for SVOCs" and that "...[T]he grant of NFA of these two SWMUs is conditioned upon its continued fulfillment of the monitoring and sampling requirements as set forth herein." NMED requests explanation of why the Permittee in this Report has mentioned about performing just four rounds of sampling in September and March from September 2006 to March 2008.

**Comment 2**                          **Section 2**                  **Table 2-1 and Section 2.2**

Section 2.3 of the May 2006 document *Work Plan SWMU 27B (Dona Ana Oxidation Lagoon and SWMU 76 (Meyer Oxidation Lagoon)*, states that the "...Wastewater samples will be manually collected using a direct sampling method. The water sample will be collected from the end of the outfall pipe, or a manhole near the end of the pipe..." and "...The sample will be collected by lowering a clean 1-liter amber bottle into the water, allowing the bottle to fill, and then transferring the water to the appropriate sample containers..."

The Permittee in Table 2-1 (Areas Designated for New Mexico Range Outfalls Waste Water Monitoring) and in Section 2.2 (ISCO Sampler Preparation & Installation) on page 2 of the Report, indicate that ISCO samplers were used to collect the wastewater samples from all the sites. This contradicts the method proposed in the May 2006 work plan.

NMED requires that in future reports, the Permittee include a separate section describing and explaining such deviations from the approved work plan(s).

The Permittee must respond to the comments included in his letter no later than January 11, 2008. NMED will reevaluate the report once the requested information is provided. Please contact Swarna Latha Vonteddu at (505) 476-6057 should you have any questions.

Sincerely,

Handwritten signature of John E. Kieling.

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

Mr. Landreth  
December 20, 2007  
Page 3

cc: Ron Baca, FB  
D. Cobrain, NMED HWB  
C. Frischkorn, NMED HWB  
S. Vonteddu, NMED HWB  
File: FB 2007 and Reading  
HWB-FB-007-002