



April 9, 2008

DCN: NMED-2008-05

Mr. David Cobrain  
Hazardous Waste Bureau  
2905 Rodeo Park Dr. E/Bldg 1  
Santa Fe, NM 87505

RE: Review of the Revised Sampling and Analysis Plan McGregor Range and Doña Ana Range  
SWMU Sites, Fort Bliss, New Mexico, January 2008

Dear Mr. Cobrain:

This letter serves as a deliverable for work regarding Fort Bliss and addresses our evaluation of the incorporation of responses to State Notice of Deficiency Comments (dated May 4, 2007) into the Revised Sampling and Analysis Plan (SAP) dated January 2008. An evaluation of each of the State comments (Nos. 1-12) is provided below.

Comment 1: The State comment indicated that background concentrations should be established for both surface soil [0 to 0.5 feet (ft) below ground surface (bgs)] and subsurface soil (greater than 0.5 ft bgs). Section 3.2 of the Revised SAP indicates that background samples will be collected to represent each soil type and horizon noted within the ranges being sampled. While the text in the SAP does not specifically mention surface versus subsurface soil or specific depths, defining background concentrations by soil horizon and type may be sufficient. However, even within similar soil types, there can be variations in concentrations due to leaching, plant uptake/bioaccumulation, weathering, etc. While the proposed sampling method may be appropriate, as the SAP does specify that samples from comparable soil horizons will be used for comparison, it is still advised that Fort Bliss collect separate background samples representative of surface and subsurface conditions, especially if deeper subsurface samples (greater than one ft bgs) may be collected.

Comment 2: This comment has been adequately addressed. Section 3.2 of the Revised SAP indicates that site-specific background concentrations will be determined for both the McGregor and Doña Ana Ranges. The SAP has been revised to remove references of using these background concentrations at other sites within Fort Bliss. It should be noted that the use of background data generated from implementation of this SAP may be appropriate for use at other sites, if sufficient data are available to confirm similarity of soil types and horizons.

Comment 3: This comment has been adequately addressed. Section 3.2 of the Revised SAP includes a discussion of non-detects and indicates that the Environmental Protection Agency's (EPA) ProUCL will be used to evaluate non-detects and outliers.

Comment 4: This comment has been adequately addressed. Section 3.1.4 of the Revised SAP indicates that samples will be analyzed for 23 metals.

Comment 5: Pertinent sections of the Revised SAP (e.g. Section 2.5) were not provided to evaluate the incorporation of this comment. A determination as to the adequacy of a revised schedule could not be made.

Comment 6: pertinent sections of the Revised SAP were not provided (e.g. Section 1.1) to us to evaluate the adequacy of the incorporation of this comment in its entirety. However, Section 3.2 of the Revised SAP does indicate that background concentrations will be collected for Solid Waste Management Unit (SWMU) 27.

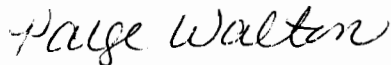
Comments 7 - 10: Pertinent sections of the Revised SAP were not provided to evaluate the incorporation of responses to these comments.

Comment 11: This comment has been adequately addressed. The last paragraph of Section 3.2 of the Revised SAP provides an adequate discussion of how site data will be compared to background.

Comment 12: Pertinent sections of the Revised SAP (e.g. Section 4.8) were not provided to evaluate the incorporation of this response to the comment.

If you or any of your staff have questions, please contact me at (801) 451-2864 or via email at paigewalton@msn.com.

Thank you,



Paige Walton  
AQS Senior Scientist and Project Lead

cc: Cheryl Frischkorn, NMED (electronic)  
Joel Workman, AQS (electronic)