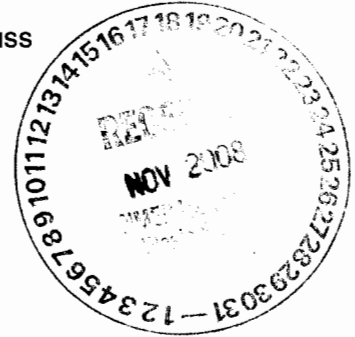




DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BLISS
1 PERSHING ROAD
FORT BLISS, TEXAS 79916-3803

REPLY TO
ATTENTION OF:

November 14, 2008



IMWE-BLS-PWE

Mr. James P. Bearzi
Chief
Hazardous Waste Bureau
State of New Mexico
Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

SUBJECT: Notice of Disapproval Wastewater Sampling Results Report for March 2008 and September 2007 For Meyer and Dona Ana and Wastewater Flow Monitoring Reports for March 2008 – June 2007 for Meyer and Dona New Mexico Range Outfalls Fort Bliss EPA ID No. NM4213720101 HWB-FB-08-003

Dear Mr. Bearzi:

In response to your letter of September 15, 2008 the following information is provided:

Comment 1: Section 1.2

In Section 1.2 (Field Investigation and Reporting), page 1, in the second paragraph the Permittee states that “Four rounds of sampling, analysis and reporting are required under this contract.”

In the Fort Bliss January 10, 2008 NOD response to the 2007 wastewater sampling report, the Permittee clarified that the contract referred to is the contract between Fort Bliss and Tetrahedron, Inc. There is a possibility for the reader to misinterpret the term “contract” as being the Settlement Agreement signed on January 2006 between NMED and the Permittee. The Permittee should clearly distinguish in the Report, the contract between Fort Bliss and Tetrahedron, Inc., and the Settlement Agreement (January 2006). The Permittee must revise the language in this section to clearly identify which contract the Permittee is referring to.

Response 1:

Section 1.2, page 1, paragraph 2, lines 2-4, have been reworded in both the *Waste Water Sampling Results Report for September 2007 – Semi-Annual Wastewater Compliance Sampling for Meyer and Doña Ana – New Mexico Range Outfalls at Fort Bliss, Texas* and the *Waste Water Sampling Results Report for March 2008 – Semi-Annual Wastewater Compliance Sampling for Meyer and Doña Ana – New Mexico Range Outfalls at Fort Bliss, Texas* reports to read:

“As part of the Settlement Agreement, Fort Bliss requires semiannual wastewater sampling analyses, at two sites in New Mexico and preparation of reports for the Fort Bliss Directorate of Environment (DOE). The samples are to be taken in September and March. This report covers the September 2007 sampling results.”

Comment 2: Section 2

In Section 2 (Monitoring Locations and Requirements), page 2, in the first paragraph, the Permittee states that "Each monitoring site is described in Appendix A of the Work Plan for Wastewater Sampling, Fort Bliss – New Mexico Operations.

It is unclear what each monitoring site consists of. Therefore, rather than referring to a previous document submitted to NMED, the Permittee must revise Section 1.1 (Background) of the Report to include a brief description of each monitoring site.

Response 2:

The Section 1.1 (Background) of the NMED report has been revised to include a brief description of the Doña Ana and the Meyer monitoring sites as follows:

"The Doña Ana Outfall monitoring site (32° 8.67'N, 106° 30.32' W) is located about ¼ mile south of the Doña Ana Range Camp and about ¼ mile west of War Road. The Doña Ana Outfall is located behind a locked gate that is located approximately 250 meters from the Doña Ana Base Camp. The outfall is 2' deep, 3' in diameter, with a 24" manhole cover. The input is 8" in diameter and the output consist of two 8" pipes that feed through a soil berm to the sewer pond."

"The Meyer Base Camp Monitoring site (32° 1.712'N, 106° 8.887' W) is located approximately 250 meters from a training / temporary prisoner confinement area. The outfall is six feet wide with a 24" manhole cover. This is a sewage lift station."

Comment 3: Section 3

In Section 3.1 (Analytical Sampling) page 6, in the second paragraph, the Permittee states that "[t]his is a semiannual monitoring requirement and must be conducted in March and September for four rounds starting in September 2006."

Even though NMED understands that the four rounds of sampling is in accordance with the contract between the Permittee and Tetrahedron, Inc., the Permittee must exclude references to private party contact terms from the Report. Refer only to the Settlement Agreement, where necessary. The Permittee must revise the text in this section accordingly.

Response 3:

The references to the private party contract terms has been removed from the report in Section 3.1. The second paragraph in section 3.1 now reads, "This is a semiannual monitoring requirement and must be conducted in March and September."

Comment 4: Section 3

In Section 3.3 (Wastewater Sample Collection) page 7, in the first paragraph, the Permittee states that, "Analytical Results for the oxidation pond at the Dona Ana Range Camp and the Meyer Rang Camp are located in Tables 2-2 and 2-3."

Tables 2-2 and 2-3 do not contain the analytical results for the Dona Ana Range Camp and the Meyer Range outfalls, but contain the numeric effluent limitations set by El Paso's El Paso Water Utilities (EPWU's) Rule #9 and NMED Settlement Agreement. Tables 3-2 through 3-6 present the analytical results for the samples collected from these two outfalls. It is not clear if the Permittee intended to state that the analytical results from each of the two designated wastewater outfalls was compared to the numeric effluent limitations set by El Paso's EPWU's Rule #9 and the NMED Settlement Agreement located in Tables 2-2 and 2-3. The Permittee must revise the text in this section to clarify and reference the correct tables.

Response 4:

Text has been revised to read in both reports "Analytical results from all designated wastewater outfalls were compared to the numeric effluent limitations set by El Paso's EPWU's Rule #9 and NMED Settlement Agreement (effluent limitations found in Tables 2-2 through 2-4). Analytical Results for the monitoring sites at the Doña Ana Range Camp and the Meyer Range Camp are located in Tables 3-2 through 3-6."

Comment 5, Section 3

In Section 3 (Wastewater Analytical Monitoring), Table 3.7, the Permittee attaches a data qualifier "B: to the results for the Arsenic QC (Duplicate) sample collected at the Oro Grande Outfall. The Permittee did not define the data qualifier in the footnotes of the table. The Permittee must revise the footnotes to define all data qualifiers use in the table.

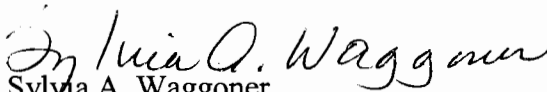
Response 5:

The "B" qualifier used in Table 3.7 has been defined in the notes below Table 3-7 of the March 2008 report. The following has been added "B = Result value is greater than or equal to the minimum Detection Limit (MDL) and less than the Reporting Limit (RL)."

Fort Bliss is attaching the replacement Wastewater Sampling Results Reports for March 2008 and September 2007 (encl 1 and encl 2) to replace the previous reports in their entirety with the exception of the appendices of each report which are still valid.

Should you require additional information or clarification, please contact Mr. Jack Lady, Water Program Manager (915) 568-0558 or at jack.lady@us.army.mil)

Encl (2)


Sylyia A. Waggoner
Chief, Multimedia Compliance Branch, DPW-E
Directorate of Public Works