



FLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, U. S. ARMY GARRISON COMMAND
1733 PLEASANTON ROAD
FORT BLISS, TEXAS 79916-6816

 ENTERED

September 3, 2009

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 2009, Semiannual Wastewater Compliance Sampling For Meyer and Dona Ana - New Mexico Range Outfalls and Wastewater Flow Monitoring Reports April 2009 - October 2008 For Meyer and Dona Ana - New Mexico Range Outfalls EPA ID #NM4213720101 HWB-FB-09-003

Dear Mr. Bearzi:

In response to your letter of August 12, 2009 the following information is provided:

Comment 1: Table 3-2 of the Report (page 8) contains footnote "1" associated with Meyer and Doña Ana composite samples for total suspended solids (TSS); however, neither the Report text nor the table's footnotes define what footnote "1" represents. The Permittee must submit a revised Table 3-2 either explaining the footnote or deleting it if it is not applicable to the table for the reporting period.

Response 1: The footnote flag (1) has been removed from (BOD) and (TSS) as it is not applicable for this reporting period. A new page (8) has been submitted.

Comment 2: Table 3-3 of the Report (page 8, not page 9 as indicated in the Report's Table of Contents [TOC]) indicates the field blank associated with sampling on March 31, 2009 contained aluminum at a concentration of 39.1B milligrams per liter (mg/l); however, the corresponding laboratory report indicates aluminum was present at 39.1 ug/l (flagged with the "B" qualifier). Revise the table to include the correct concentration units for aluminum in the field blank sample.

Response 2: The TOC (page ii) has been corrected to indicate that Table 3-3 is on page 8. Table 3-3 (page 8): the concentration value for aluminum in the field blank has been changed to reflect a concentration of 0.0391 mg/L and flagged with a B qualifier. A new page (8) has been submitted.

Comment 3: Table 3-4 of the Report (page 9, not page 10 as indicated in the Report's TOC) contains some errors concerning the associated laboratory reports. The Chemical Abstracts Service (CAS) number for di-n-octyl phthalate is not included in the table. According to the associated laboratory reports, the CAS number for this compound is 117-84-0. Include all available CAS numbers in the revised table. The column for Meyer results lists a concentration value for benzoic acid of 0.382 mg/L. The value is footnoted with an "a" designation by the laboratory but the footnote is not defined in the laboratory report. Revise the table to include an explanation of the laboratory footnote "a". The column for Meyer results lists a concentration value for bis (2-ethylhexyl) phthalate as not detected (ND); however, the corresponding laboratory report indicates the compound was present in the sample at a concentration of 33.4 ug/l (or 0.0334 mg/l). Revise the table to include the correct concentration value for the compound. The column for Doña Ana indicates a concentration value for butyl benzyl phthalate of 0.0015 J mg/l while the corresponding laboratory report indicates the compound was ND with a reporting limit of 5.0 1 ug/L and method detection limit of 1.7 ug/L. Revise the table to include the correct concentration value, or otherwise resolve the discrepancy.

Response 3:

The Table of Contents (TOC, page ii) has been updated to reflect the correct page numbers for the Tables. A new page (ii) has been submitted.

Table 3-4 (page 9) has had the needed CAS numbers added.

The laboratory designation of (a) for benzoic acid, indicated that the result was derived from a second analytical run (This is noted on page 7 of 48 of Accutest's laboratory report for Meyer. The laboratory reran the sample because there was a high initial analytical value for benzoic acid from the first analysis. The laboratory designation for "(a)", has been added to the footnotes for Table 3-4. A new page (9) has been submitted.

The concentration value for bis (2-ethylhexyl) phthalate for the Meyer site has been corrected.

The concentration value for butyl benzyl phthalate for the Doña Ana site has been corrected. A new page (10) has been submitted.

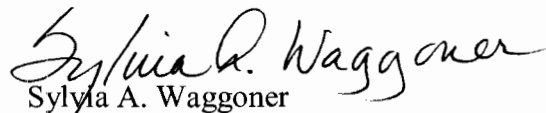
Note: New pages (ii, 8-11) have been submitted with this Response to Comments, and should be placed in the document "Wastewater Sampling Results Report for March 2009, Semiannual Wastewater Compliance Sampling For Meyer and Doña Ana - New Mexico Range Outfalls" issued April 2009 (Encl).

Comment 4: Several apparently anomalous wastewater temperature readings (100 degrees centigrade or greater) are presented in various Report graphs for April, March, February and January 2009 and December 2008 at the Meyer facility. During a recent telephone conversation with Mr. Jack Lady (Fort Bliss Wastewater Program Manager), NMED staff verified that the anomalous readings were due to faulty meter readings. Mr. Lady indicated that the meters have since been replaced which will result in more typical readings for future Reports. In future Reports, Section 3.6 (Data Quality Issues) should provide discussion of all data quality issues, rather than limiting the focus to only laboratory data quality issues.

Response 4: In future reports for "Semi-annual Wastewater Compliance Sampling for Meyer and Doña Ana - New Mexico Range Outfalls", Section 3.6 (Data Quality Issues), a discussion of all data quality issues will be provided that include both laboratory and non-laboratory data quality issues, if applicable. In addition, future reports for "Wastewater Flow Monitoring Reports for Meyer and Doña Ana - New Mexico Range Outfalls", data quality issues will also be discussed with more detail, if applicable. JK

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



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

**Table 3-2 Composite Sample Analytical Results Summary,
(Regulatory Limits per EPWU Rule #9)**

Outfall Designation	Analytes (all results are mg/L)															
	BOD	COD	TDS	TSS	Arsenic	Cadmium	Chromium	Copper	Iron	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Zinc
Meyer	536	614	789	18.3	0.0044 B	ND	0.0064 B	0.0088 B	0.154	ND	ND	0.0044 B	ND	0.0043 B	0.0012 B	0.0728
Doña Ana	67.0	95.7	396	16.5	0.0035 B	ND	0.0036 B	0.0436	0.240	0.0028 B	ND	0.0043	ND	ND	ND	0.0558
Field Blank	0.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Regulatory Limits (TBLL)	NS	NS	6,140	NS	0.17	0.11	1.22	2.39	NS	0.66	0.002	0.15	1.71	0.35	0.98	5.37
Highest Percent (%) of analyte found based on TBLL (for all sample sites) *	NS	NS	33.7	NS	3.2	84.5	0.80	1.8	NS	1.02	ND	5.1	0.30	1.23	0.43	2.27

ND = Not Detected.

TBLL = Technically Based Local Limit concentration for each analyte tested.

NS = Not Specified: there is no TBLL concentration for these analytes.

B = indicates value between MDL and RL

* Based on the ratio of the highest concentration found of an analyte from all samples taken to the TBLLs, in percent (%).

Table 3-3 Composite Sample Analytical Results for Other Metals per NMED Settlement Agreement

Outfall Designation	Analytes (all results are mg/L)											
	Aluminum	Antimony	Barium	Beryllium	Calcium	Cobalt	Magnesium	Manganese	Potassium	Sodium	Thallium	Vanadium
Meyer	0.227	ND	0.0659 B	ND	36.6	ND	9.95	0.0185	29.7	149	ND	0.0109 B
Doña Ana	0.165 B	ND	0.0855 B	ND	34.1	ND	9.52	0.0179	16.2	70.4	ND	0.0086 B
Field Blank	0.0391 B	ND	ND	ND	0.0421 B	ND	ND	ND	ND	ND	ND	ND

ND = Not Detected.

B = indicates value between MDL and RL

**Table 3-4 Composite Sample - Detectable SVOCs Summary (Method 8270)
per NMED Settlement Agreement**

Detectable SVOCs (units in mg/L)				
Analyte	CAS#	Meyer	Doña Ana	Field Blank
1,4-Dichlorobenzene	106-46-7	0.0017 J	ND	ND
3&4 Methylphenol	108-39-4 106-44-5	0.091	0.0101	ND
Benzoic acid	65-85-0	0.382 (a)	0.0761	ND
Benzyl alcohol	100-51-6	0.0197	0.0052	ND
bis(2-Ethylhexyl)phthalate	117-81-7	0.0334	0.0106	ND
Butyl benzyl phthalate	117-84-0	ND	ND	ND
Diethylphthalate	84-66-2	0.0037 J	0.002 J	ND
Di-n-octyl phthalate	117-84-0	ND	0.0015 J	ND
Phenol	108-95-2	0.0196	ND	ND

ND = Non-detected.

J = Result value is greater than Method Detection Limit (MDL) and less than Reporting Limit (RL)

(a) = Analytical Value was obtained from a second run of the sample.

Table 3-5 Grab Sample Analytical Results Summary

Outfall Designation	Analytes						
	Benzene	Ethyl- benzene	Toluene	Xylenes	Cyanide	Oil & Grease	pH
	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	pH units
Meyer	ND	ND	0.0010 J	ND	ND	34.3	7.1
Doña Ana	ND	ND	ND	ND	0.0061 B	13.0	8.2
Field Blank	ND	ND	ND	ND	0.0017 B	5.0	5.7
Regulatory Limits (TBLL)	20	16	17	17	1.31	100	5.5-10.5
Highest Percent (%) of analyte found based on TBLL (for all sample sites) *	NC	NC	0.46	NC	0.76	68.1	---

TBLL = Technically Based Local Limit concentration for each analyte tested.

NS = Not Specified: there is no TBLL concentration for these analytes.

ND = Not Detected.

Based on the ratio of the highest concentration found of an analyte from all samples taken to the TBLLs, in percent (%).

J = result > Method Detection Limit and < Reporting Limit.

Table 3-6 Grab Sample – Other Detectable VOCs (Method 8260)

Detectable VOCs (units in mg/L)					
Analyte	CAS#	TBLL (mg/L)	Meyer	Doña Ana	Field Blank
Acetone	67-64-1	NA	0.0283	0.0929	ND
Bromodichloromethane ¹	75-27-4	NA	0.00074	0.00074 J	ND
Bromoform ¹	75-25-2	NA	0.0022	ND	ND
Chloroform ¹	67-66-3	NA	0.0015	ND	ND
Carbon Disulfide	75-15-0	NA	0.00096 J	ND	ND
Chlorodibromomethane ¹	124-48-1	NA	0.002	0.00089 J	ND
Tetrachloroethylene	127-18-4	NA	ND	ND	ND

¹ These are disinfectant by-products.

NA = Not applicable, this is not an EPWU analyte under Rule #9. There is no TBLL concentration.

ND = Non-detected.

J = Result value is greater than Method Detection Limit (MDL) and less than Reporting Limit (RL).

3.5 DISCHARGE LIMIT EXCEEDANCES

All analytical results are well within EPWU Rule #9 limits. There are no EPWU Rule #9 regulatory limits exceeded for these outfalls. These limits are not required to be reported to the EPWU or the NMED and the data is for comparability purposes only with effluent quality parameters used elsewhere on the installation.

3.6 DATA QUALITY ISSUES

Upon receipt of analytical results, Tetrahedron, Inc. conducted a thorough data review and quality check of the results. Two QC samples were collected (one composite and one grab) from the Doña Ana outfall location, labeled as Doña Ana QC. Comparison of these results can be found in Tables 3-7 and 3-8.

All MDLs are satisfied and all surrogate recoveries are within acceptable method criteria. All samples are free of contaminants as observed from a method blank that met all criteria. The matrix spike (MS) recoveries met acceptable method criteria. The matrix spike duplicate (MSD) relative percent differences (RPD) are also under control.

APPENDICES

- A Copy of Field Log Pages and pH Calibration Pages for Current Reporting Period for March 2009
- B Laboratory Data Reports for Analytical Samples Collected March 2009
- C Chain of Custody Forms for Analytical Samples Collected March 2009

TABLES

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Field Blank	0.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Regulatory Limits (TBLL)	NS	NS	6,140	NS	0.17	0.11	1.22	2.39	NS	0.66	0.002	0.15	1.71	0.35	0.98	5.37
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Benzyl alcohol	100-51-6	0.0197	0.0052	ND
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Diethylphthalate	84-66-2	0.0037 J	0.002 J	ND
Di-n-octyl phthalate	117-84-0	ND	0.0015 J	ND
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Chloroform ¹	67-66-3	NA	0.0015	ND	ND
Carbon Disulfide	75-15-0	NA	0.00096 J	ND	ND
Chlorodibromomethane ¹	124-48-1	NA	0.002	0.00089 J	ND
Tetrachloroethylene	127-18-4	NA	ND	ND	ND

¹ These are disinfectant by-products.

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