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

ENTERED

RECEIVED
MAR 2010
NMED Hazardous Waste Bureau

REPLY TO
ATTENTION OF:

March 12, 2010

Environmental Division

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

Dear Mr. Bearzi:

This is in reference to your Notice of Disapproval Wastewater Sampling Results Report for September 2009, Semiannual Wastewater Compliance Sampling For Meyer and Dona Ana - New Mexico Range Outfalls EPA ID #NM4213720101 HWB-FB-09-004. In response to your letter of February 18, 2010 the following information is provided:

Comment 1. Table 2-3, Additional Analytes Required for NMED Settlement Agreement:

NMED Comment: Section IV.G.1 of the Settlement Agreement (SA) requires sampling for volatile organic compounds (VOCs) at both outfall locations. The Permittee collected samples for VOC analyses at both locations. The table does not include a listing for VOCs. In future Reports, add a row for VOCs (EPA Method 8260) to Table 2-3 to reflect the requirements of the SA and the Permittee's compliance with the SA.

Response 1. VOCs were sampled and analyzed in accordance with the Settlement Agreement (SA) and the results were presented in two tables. The first table (Table 2-2) lists the analytes and methods as required by El Paso Water Utilities Rule #9 and the SA. The next table (Table 2-3) lists additional analytes that are not required by Rule #9 but required by the SA. This format is based on our letter of May 30, 2006 and has been used in the past without any comment from NMED. In the future, a row for VOCs (EPA Method 8260) will be added to Table 2-3 to reflect the permittee's compliance for the additional VOC requirements of the SA.

Comment 2. Table 3-4, Composite Samples - Detectable SVOCs Summary (Method 8270) per NMED Settlement Agreement:

NMED Comment: The table lists four semi-volatile organic compounds (SVOCs) present in the Meyer Duplicate sample. NMED could not find a Gulf Coast Accutest Laboratories (Accutest) laboratory report that contains those numerical results for a Meyer Duplicate sample; however, there is a laboratory report (pages 11 and 12 of 51) that contains the same four SVOCs with the same numerical results but the sample designation for that sample is "NM _ QC COMPOSITE".

Include an explanation in the response letter which clarifies that the laboratory designation was incorrect, if that is the case. Otherwise, provide a copy of the laboratory report containing the analytical results for the Meyer Duplicate sample.

Response 2: The sample is not labeled as a particular site duplicate as EPA recommends that the duplicate be submitted to the laboratory as a blind sample. http://www.epa.gov/region6/6pd/qa/qadevtools/mod5_sops/sample_handling_preservation/appendix_b3.pdf. A hardcopy is attached (encl 1).

The Meyer duplicate sample was submitted to the laboratory as a blind QC sample and is explained in Section 3.7 (FIELD QUALITY CONTROL SAMPLES). A sentence indicating that the laboratory refers to the Sample Duplicate as NM_QC for both the grab and the composite samples has been added to Section 3.7.1 for further clarification (encl 2).

Comment 3. Table 3-6, Grab Sample - Other Detectable VOCs (Method 8260):

NMED Comment: According to the October 9, 2009 Accutest report (page 8 of 51), toluene was reported present in the NM_MEYERS RANGE_GRAB sample at a concentration of 7.2 micrograms per liter u*g/l)* but toluene is not listed in Table 3-6. Review the laboratory reports and revise Table 3-6 in future Reports to reflect the laboratory report information.

Response 3: BTEX volatiles are reported in Table 3-5 as part of the Rule #9 analytes, toluene is reported in mg/l. Table 3-6, "Grab Sample - Other Detectable VOCs (Method 8260)", list any other volatiles found beyond BTEX. Again, we have used the same format in previous submissions with no comments from NMED. In future reports we will combine both tables (Table 3-5 and Table 3-6).

Comment 4. Work Plan For Wastewater Fort Bliss - New Mexico Operations:

NMED Comment: The SA does not require submittal of work plans prepared by the Permittee's consultant for the Permittee and the United States Army Corps of Engineers (USACE). The work plan is apparently the result of some contractual arrangement(s) between the Permittee's consultant and the USACE. Refrain from sending copies of current or future work plans prepared within such a framework to NMED.

Response 4: The work plan was submitted to keep NMED updated with the current/modified sampling and analysis methods used. The workplan will not be submitted to NMED in the future.

General Comment: Most of the comments above are similar to past comments NMED has provided to the Permittee and Ms. Waggoner are generally related to an apparent lack of technical oversight review prior to submittal of the Reports to NMED. The letter must indicate what steps the Permittee will take to ensure that future Reports will receive an appropriate level of technical review prior to submittal to NMED. The response letter must also address what steps the Permittee will take to ensure future compliance with the analytical, flow monitoring, and reporting requirements outlined in the January 2006 SA.

Response: The above comments were unique and the information requested in the comments was in the report. There were no omissions or errors. Request NMED provide preferred format for future reports. Please note that our next report will be prepared in early April 2010, therefore, early advice on new format will be appreciated. For future reports, we will ensure that NMED's format is followed and we will continue to ensure that reports are produced with no omissions and errors.

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.

Sincerely,

Sylvia A. Waggoner
Chief, Multimedia Compliance Branch
Environmental Division
Directorate of Public Works

Enclosure

Appendix B-3
Field QC and Laboratory QC Sample Collection and Documentation Requirements

SAMPLE TYPE	PURPOSE	COLLECTION [1]	SAMPLE NUMBER
Field Duplicate [2]	To check reproducibility of laboratory and field procedures. To indicate non-homogeneity.	Collect from areas that are known or suspected to be contaminated. Collect one sample per week or 10% (projects may vary) of all field samples per matrix, whichever is greater.	Assign two separate (unique) sample numbers (i.e. one number to the primary sample and one to the duplicate). Submit blind to the lab.
Field Blanks	To check cross-contamination during sample collection, sample shipment, and in the laboratory. Also to check sample containers.	Collect for each group of samples of similar matrix per day of sampling. Organics - Use water (demonstrated to be free of the contaminates of concern). Inorganics - Use metal-free (deionized or distilled) water.	Assign separate sample numbers to the trip blanks. Submit blind to the lab.
Volatiles Trip Blank	To check contamination during sample handling and shipment from field to laboratory.	Prepare one sample using water demonstrated to be free of the contaminates of concern (DI water is appropriate). Place this sample in the cooler used to ship volatile samples.	Assign separate sample numbers to the equipment blanks. Submit blind to the lab.
Equipment Blank or Rinse Blank	To check field decontamination procedures.	Collect when sampling equipment is decontaminated and reused in the field or when a sample collection vessel (bailer or beaker) will be used. Use blank water (water decontamination to be organic-free, deionized or distilled for inorganics) to rinse water into the sample containers.	Assign separate sample numbers to the equipment blanks. Submit blind to the lab.
Matrix Spike and Matrix Spike Duplicate [3]	Required by laboratory's contract to check accuracy and precision of organic analyses.	Collect triple volume for one water sample per 20 water samples. The triple volume water sample should be collected in the first shipment of organics samples.	Assign the primary sample, extra volume, matrix spike and matrix spike duplicates the same sample number. Label the extra volume "Lab QC".
Spike and Lab Duplicate[3]	Required by laboratory's contract to check accuracy and precision of inorganic analyses.	Collect double volume for one water sample per 20 water samples. The double water volume samples should be collected in the first shipment of inorganic samples.	Assign the primary sample, extra volume, spike and duplicate the same sample number. Label the extra volume "Lab QC."

1 Consult Regional or Project Manager guidance for field QC sample frequencies; laboratory QC sample frequencies are generally fixed in the laboratory subcontracts or specified in analytical methods.

2 A true split for sediment, sludge, and soil samples (and other heterogenous samples such as highly turbid waters) is typically not feasible under field conditions. A split of this type of sample should generally be considered a duplicate.

3 No extra volume is required for the soil/sediment matrix; however, the sample to be used for laboratory QC must be designated on the Traffic Report/Chain-of-Custody Record.

3.7 FIELD QUALITY CONTROL SAMPLES

The following types of QC samples are collected in the field and shipped:
Field duplicates, field blanks and trip blank samples.

3.7.1 Field Duplicates

This type of field duplicate measures the total system variability (field and laboratory variance). Two field duplicates were obtained, one composite and one grab sample from the Meyer Outfall location. It must be noted that while the grab samples are true duplicate samples, the composite duplicate is actually a split sample taken from the composite of the original. The laboratory refers to the Sample Duplicates as NM_QC for both the grab and the composite samples.

Although all composite samples are mixed in an attempt to ensure sample uniformity prior to collection of the split sample, the method of sample capture can result in an unequal partitioning of suspended solids that affect other parameters. The larger RPDs for some parameters, i.e. BOD, TSS, molybdenum, and oil and grease, are driven by the non-homogeneous character of the wastewater samples.

3.7.2 VOC Trip Blank and Field Blank

Trip blanks, consisting of an aliquot of laboratory grade deionized water, are shipped with VOC sample containers and are used to determine whether the sample bottle was contaminated during shipment from the bottle storage, shipment to the laboratory, or during analysis at the laboratory. Field blanks, filled with distilled water in the field during sample collection, are collected to evaluate potential contamination of samples during sample collection.

encl 2