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 19, 2010

Directorate of Public Works

Mr. John E. Kieling
Program Manager
Permits Management Program
New Mexico Environmental Department-HWB
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Dear Mr. Kieling:

On May 10, 2010, the Directorate of Public Works, Environmental Division received an "Approval With Direction" for the Revised Supplemental RCRA Facility Investigation (RFI) Report, Solid Waste Management Unit #19 (SWMU-19), McGregor Range Camp Oxidation Lagoon, November 2009, Fort Bliss, New Mexico EPA ID #NM7572124454, HWB-FB-09-005. Letter comment 5 Lagoon Liner, indicates that in the NOD dated June 6, 2005, the New Mexico Environmental Department (NMED) expressed concern for the structural integrity of the pond liner. The Permittee indicated that the liner is damaged due to weathering from ultraviolet (UV) light, air and other climate conditions where the liner is exposed at the top of the banks around the perimeter.

In the RIF Report date November 2009, it is stated that water and sediments in the oxidation lagoon are confined to the lagoon. While the liner along the banks, above the water line has been deteriorated from exposure, the liner below the water line is not expected to be deteriorated, as it is covered by wastewater and sediment and thus not exposed to heat and sunlight. Furthermore the results of previous subsurface investigation provide strong evidence to indicate the presence of low permeability geologic materials beneath the lagoon at depth that will serve to impede the downward migration of water and solutes.

NMED observed that a second overflow oxidation lagoon was built capable of being used to control the level of the wastewater in the original oxidation lagoon. NMED further maintains that because of the potential for release of contaminants beyond the lagoon perimeter, the Permittee must maintain the surface of the wastewater in the original oxidation lagoon below the level where the liner is damaged. However, in Comment 6 Change in Use or Closure of Oxidation Lagoon, NMED has concurred with the conclusions of the RIF report and states that, "the Permittee has demonstrated that no significant risk attributable to operation of the oxidation lagoon has been identified and that conditions present at the lagoon do not pose a threat to human health or environment. No corrective action is warranted at this time."

In addition, were the level of the wastewater in SWMU-19 to be lowered, would adversely impact the ability of the second lagoon to function properly, rendering it unserviceable.

Currently, the Army is considering the construction of a third larger lagoon directly east of the existing ponds. If the project is approved and funded, wastewater could then be diverted via a split valve to this new lagoon, lowering the wastewater levels or completely draining SWMU-19 to allow maintenance of the liner and/or even replacing the entire liner if needed. This would all be based on the availability of federal appropriations.

For these reasons stated above the Permittee, does not agree that conditions exist warranting lowering the wastewater level in SWMU-19 as recommended at this time.

If you have any questions concerning this report please do not hesitate to contact Ron Baca, at (915) 568-7979; ron.baca@us.army.mil or Joel Reyes at (915) 568-6993; joel.reyesjr@us.army.mil.

Sincerely,

Alfredo J. Riera, P.E.
Director of Public Work