



**DEPARTMENT OF THE ARMY**  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BLISS  
1741 MARSHALL ROAD  
FORT BLISS, TEXAS 79916

ENTIRE

December 12, 2014

Environmental Division

**RECEIVED**

DEC 17 2014

Mr. David Cobrain  
Project Leader  
New Mexico Environmental Department-HWB  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

**NMED**  
**Hazardous Waste Bureau**

Dear Mr. Cobrain:

Based on NMED's Response Letter dated June 26, 2014, attached, it is stated that "NMED agrees that the landfill does not need to be closed under 40 CFR 264, and that the reference made in the previous report was incorrect." It is the understanding that remedial action will be conducted under the provision of 40 CFR 264.101 for corrective action (§264.101 Corrective action for solid waste management units).

Within the second paragraph NMED is in agreement that the best remedy would be the complete removal of the landfill. The identified conditions are that the disposal of the removed waste is able to be disposed at a permitted municipal landfill, and that the Permittee submit a work plan that provides information of the dimensions of the landfill, waste characterization methods, waste collection disposal and of confirmatory samples from the walls and base of the excavated area.

It is the intent of Fort Bliss to proceed with Corrective Action with the implementation of presumptive remedies at this small-scale and relatively simple site that does not have any groundwater contamination.

- a. Corrective Action will proceed under an Accelerated Cleanup Process, 20.4.2.7.B NMAC, 20.4.2.208 Accelerated Corrective Action (ACA) Work Plan.
- b. Upon ACA Work Plan approval, Fort Bliss will implement per agreed schedule.
- c. Fort Bliss will submit a Remedy Completion Report to NMED for final approval.

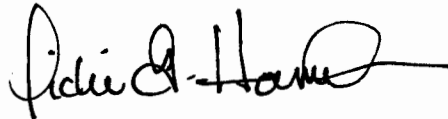
The following action will meet the requirement determination for "Corrective Action Complete without Controls" (68 FR 8764, 20.4.1.500, 40 CFR 264.101)

Fort Bliss requested an extension, in a letter dated, July 31, 2014. NMED granted the request and indicated that the work plan be submitted by April 8, 2015. The

government is currently finalizing the Scope of Work for a contract to remediate the site. It is expected that the contract will be awarded in late February or early March. It will take approximately five months for the contract to develop the work plan and achieve Army approval prior to submission to NMED. Therefore the Work Plan would probably not be available for NMED review until August 2015. We are not requesting an extension at this time, but wanted you to be aware of our intended schedule. We will formally request an extension after award of the contract, when we have a firmer schedule. If the contract award date slips beyond April 8, we will notify you of the slippage and the estimated impact.

If you have any questions concerning this letter, please do not hesitate to contact Isaac Trejo, at 915-478-1153 or email [isaac.trejo@us.army.mil](mailto:isaac.trejo@us.army.mil).

Sincerely,

A handwritten signature in black ink, appearing to read "Vicki G. Hamilton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Vicki G. Hamilton, R.A.  
Environmental Division Chief  
Directorate of Public Works

Enclosure



SUSANA MARTINEZ  
Governor  
JOHN A. SANCHEZ  
Lieutenant Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
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[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)**



RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

June 26, 2014

Vicki G. Hamilton, R.A.  
Chief, Environmental Division  
Directorate of Public Works  
Department of the Army  
Headquarters, U.S. Army Garrison Command  
1741 Marshall Road  
Fort Bliss, TX 79916-3803

**RE: RESPONSE TO LETTER  
APPROVAL FINAL REPORT FOR THE COVER AND BORROW AREA  
INVESTIGATION OF THE ORO GRANDE LANDFILL (SWMU-  
25/FTBL-014)  
FORT BLISS, NEW MEXICO  
EPA ID #NM4213720101  
HWB-FB-13-002**

Dear Ms. Hamilton:

The New Mexico Environment Department (NMED) has reviewed the Department of Army's (Permittee) letter in response to the conference call held on March 21, 2014, about NMED's document *Approval-Final Report for the Cover and Borrow Area Investigation of the Oro Grande Landfill (SWMU-25/FTBL-014)*, Fort Bliss, New Mexico (status report), dated January 2, 2014.

NMED agrees that the landfill does not need to be closed under 40 CFR 264, and that the reference made in the previous report was incorrect. In the Fort Bliss 1995 Permit this unit is listed as a Solid Waste Management Unit in Table 2, List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Requiring Corrective

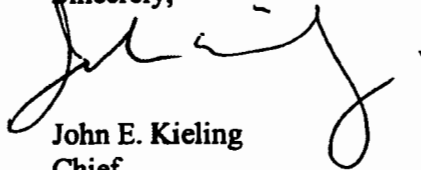
Ms. Hamilton  
June 26, 2014  
Page 2

Action (modified December 15, 2004). As stated by the Permittees in a cover letter, *Final Letter Report for the Cover and Borrow Area Investigation of the Oro Grande Landfill (SWMU-25/FTBL-014* dated September 6, 2013, 'the best option for Fort Bliss would be complete removal of waste from SWMU-25/FTBL-014, and the disposal of the waste of soil removed waste a permitted municipal landfill'. The Permittee must submit a work plan that would provide information on the dimensions of the landfill, waste characterization methods, waste collection disposal and of confirmatory samples from the walls and base of the excavated area.

The Permittee has indicated that the work plan's deadline of October 10, 2014 may need to be revised to accommodate the Permittee's funding schedule. The Permittee must submit a formal extension request to the department prior to October 10, 2014, justifying the need for and proposing a new extension deadline for the work plan to be submitted to NMED.

If you have any questions regarding this letter, please contact Siona Briley at (505) 476-6049.

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
S. Briley, NMED HWB  
R. Baca, DoA, Ft. Bliss  
S. Waggoner, Ft Blis

File: Fort Bliss (SWMU 25), Oro Grande Landfill  
FB-13-002