



FT Bliss
Oro Grande Landfill

Cobrain, Dave, NMENV

From: Monaghan, Teri, NMENV
Sent: Tuesday, March 13, 2018 11:16 AM
To: Cobrain, Dave, NMENV
Cc: Akeley, Chuck, NMENV
Subject: S&A Status -FW: WEP Comments -RE: Fort Bliss Oro Grande Landfill
Attachments: WEP Comments_Oro Grande Landfill_3-1-2017.pdf

Hi Dave,

I have learned today that Ms. Pierce is no longer with the Hazardous Waste Bureau. The Solid Waste Bureau has completed its review of a revised Waste Excavation Plan (WEP) for the Oro Grande Closed Landfill, a SWMU located at the WSMR that the HWB has been working. The latest option approved by the HWB is to remove the waste and transport it to the nearby Otero Greentree Regional Landfill versus leaving the waste in place and capping the closed landfill. Additional sampling and analysis (S&A) is a requirement in the SWMU documentation and is a missing item identified in our comments to the WEP (attached). Their revised WEP incorporates the details requested in our comment letter, including the latest S&A.

I am trying to confirm that the HWB has also received and reviewed the latest sampling and analysis from July 2017 for this SWMU project. In my review of the analysis reports, I do not see any hazardous waste hits but wanted to verify your bureau's review and if there are any concerns. Perhaps you can provide a summary of approval for our records regarding the latest waste analysis.

Feel free to call me to further discuss, if you like.
Thanks.

*Teri Monaghan
Enforcement Coordinator
NMED Solid Waste Bureau
Albuquerque, District I
(505) 383-2077*

From: Monaghan, Teri, NMENV
Sent: Wednesday, March 01, 2017 4:31 PM
To: Pierce, Aubrey, NMENV <Aubrey.Pierce@state.nm.us>
Cc: Akeley, Chuck <chuck.akeley@state.nm.us>
Subject: WEP Comments -RE: Fort Bliss Oro Grande Landfill

Aubrey,
I've attached the comment letter that went out via email this afternoon from our Las Cruces office. We did not get you cc'd in time but as you will see, the HWB may also be interested in the response as part of the SWMU project.
Thanks.

*Teri Monaghan
(505) 383-2077*

From: Pierce, Aubrey, NMENV
Sent: Wednesday, March 01, 2017 3:33 PM

To: Monaghan, Teri, NMENV <Teri.Monaghan@state.nm.us>
Subject: Re: Fort Bliss Oro Grande Landfill

Yes, thank you, Teri.

From: Monaghan, Teri, NMENV
Sent: Wednesday, March 1, 2017 3:07 PM
To: Pierce, Aubrey, NMENV
Cc: Akeley, Chuck, NMENV
Subject: RE: Fort Bliss Oro Grande Landfill

Aubrey,

Thank you for the information. We have received a Waste Excavation Plan (WEP) for the site and have prepared comments that bring to light the need for additional waste characterization prior to the SWB making a determination, or approval of the WEP. Would you like to be cc'd on the comment letter?

*Teri Monaghan
Enforcement Coordinator
NMED Solid Waste Bureau
Albuquerque, District I
(505) 383-2077*

From: Pierce, Aubrey, NMENV
Sent: Wednesday, March 01, 2017 3:03 PM
To: Monaghan, Teri, NMENV <Teri.Monaghan@state.nm.us>
Cc: Briley, Siona, NMENV <Siona.Briley@state.nm.us>; VanHorn, Kristen, NMENV <Kristen.VanHorn@state.nm.us>
Subject: Fw: Fort Bliss Oro Grande Landfill

Teri,

Siona, told me you were asking about the status of SWMU-25, Oro Grande Landfill at Ft. Bliss. Here's a timeline of the most recent events. I've also attached all or parts of these documents for your review:

2009 - Submittal of a RCRA Facility Investigation Report which included soil sampling results from 2008

2013 - Submittal of a Final Report for the Cover and Borrow Area Investigation

2014 - NMED response to the Final Report

2015 - Submittal of a Corrective Action Work Plan

2016 - NMED Response to the CAWP

The *Final Letter Report for the Cover and Borrow Area Investigation of the Oro Grande Landfill*, dated September 6, 2013, concluded that the best remedial option for the site was removing and disposing of all of the waste from the SWMU in a permitted municipal landfill. NMED responded in agreement in a letter dated June 26, 2014, and required the Army to provide a work plan describing the removal and disposal activities. The scope of the work plan was to remove all of the buried waste material from the site, dispose of the waste at a permitted landfill, confirm the absence of contamination from the waste, restore the landfill area to its previous grade and re-vegetate the restored surface w native plants. On May 13, 2016, NMED responded to the submittal, asking for additional samples and giving them a deadline of December 27, 2017 to submit their findings. As of right now, HWB hasn't received their submittal of the results of the investigation.

I hope this helps. If you have any other questions, please feel free to email or call me.

Aubrey A. Pierce

Hazardous Waste Bureau
New Mexico Environment Department
Santa Fe, New Mexico

Direct: (505) 476-6058
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aubrey.pierce@state.nm.us

From: Briley, Siona, NMENV
Sent: Tuesday, February 28, 2017 2:05 PM
To: Pierce, Aubrey, NMENV
Subject: Re: Fort Bliss Oro Grande Landfill

Thanks!

From: Pierce, Aubrey, NMENV
Sent: Tuesday, February 28, 2017 1:51 PM
To: Briley, Siona, NMENV
Subject: Re: Fort Bliss Oro Grande Landfill

Of course! Thanks!

From: Briley, Siona, NMENV
Sent: Tuesday, February 28, 2017 12:20 PM
To: Pierce, Aubrey, NMENV
Cc: Cobrain, Dave, NMENV; Monaghan, Teri, NMENV
Subject: Fort Bliss Oro Grande Landfill

Hey Aubrey,

Teri Monaghan from Solid Waste Bureau is reviewing the excavation plans for the Oro Grande Landfill at Fort Bliss and has some questions about the status of the unit, and the sampling values before they can approve the work plan for the site. I explained that I haven't worked on the site since 2014, and that you are lead on it now.

From the letter provided to SWB looks like Fort Bliss planned to do sampling for COCs in July 2016 but haven't provided SWB with any recent results to confirm that Fort Bliss can dispose of the waste in a Subtitle D Landfill. Fort Bliss has however provided results from 2009.

Could you contact her and let her know what the status is, and provide some background documents?
I looked on Magneto but couldn't find them.

- Final Letter Report for the Cover and Borrow Area Investigation for the Oro Grande Landfill (September 6, 2013)
- Approval of the Corrective Action Work Plan with Modifications (May 13, 2016)
- Work Plan Appendix B SAP (July 2016).

Thanks,

Si



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. Governor

**NEW MEXICO
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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Via USPS First Class Mail and Electronic Delivery

March 1, 2017

Merle Miller, P.E.
CAPE Environmental Management, Inc.
12037 Starcrest Drive
San Antonio, Texas 78247
<mmiller@cape-inc.com>

Re: Waste Excavation Plan FTB-014 (SWMU-25) Oro Grande Landfill, Fort Bliss, New Mexico

Dear Mr. Miller:

The New Mexico Environment Department (“NMED”), Solid Waste Bureau (“SWB”) has received a Waste Excavation Plan (“WEP” or “Plan”) for the Oro Grande Landfill located at Fort Bliss, New Mexico via electronic mail on February 22, 2017. The SWB has reviewed the WEP, and requests that the following additional information be considered and addressed before the WEP approval is granted:

General Comments:

1. The Plan as submitted does not meet the requirements of an approvable WEP by the SWB. Please see the attached Waste Excavation Checklist as the majority of the following comments relate to these specific criteria.
2. The project schedule for the excavation project does not identify transmittal, review and approval of a WEP. It is routine for the SWB to receive plans for review and provide approval as they relate to the permitted and registered solid waste facilities in New Mexico – and in this case, for the proposed disposal of excavated waste at the Otero Greentree Regional Landfill. Please note that typically 30 days is adequate for the SWB to review, respond and/or approve a site-specific WEP.
3. The SWB understands that this project involves the proposed excavation of solid waste from a Solid Waste Management Unit (“SWMU”) that is under corrective action and for which the excavation of the buried waste is the preferred action. It is also clear that site specific information is contained in the SWMU documentation since the 2009 RCRA Facility Investigation (“RFI”) Report was provided to the NMED’s Hazardous Waste Bureau (“HWB”), which has been the regulatory bureau for this site. It is likely that the HWB will continue to be involved with the assurance of proper cleanup and closure of this SWMU; however, it is the SWB’s intention and purpose of review to determine whether the excavated waste will be acceptable for disposal at a RCRA Subtitle D landfill, or specifically in this case, the Otero Greentree Regional Landfill [Permit Nos. SWM-109102 and SWM-109102(SP)], located near Oro Grande, New Mexico. With limited waste characterization information as provided in the WEP, the SWB cannot provide an acceptance determination at this time. The analytical results

provided are based on soil screening levels not land disposal acceptance criteria for such waste and/or contaminants of concern ("COC"). There are no analyses provided that represent toxicity [Toxicity Characteristic Leachate Procedure ("TCLP")], polychlorinated biphenyls ("PCBs"), total petroleum hydrocarbon ("TPH"), and asbestos analyses or radioisotope assay of the waste. Please provide representative TCLP, PCB, TPH, regulated asbestos and radioisotope analyses sampling results or discuss how and why generator knowledge is sufficient to preclude the need for additional laboratory analysis of the waste.

Specific Comments:

4. **Section 1.1 Corrective Measures Objectives and Scope –**
This section addresses the scope of the corrective measures for cleanup of the SWMU but does not explain the purpose and scope of the WEP, which is to assure the safe and proper management and disposition of the excavated waste.
5. **Section 1.2 Regulatory Requirements –**
This section references the Corrective Action Work Plan from 2015 and NMED approval in a correspondence dated May 13, 2016; however, it is unclear if the additional confirmation samples as requested in this letter were completed, as it appears only the RFI sampling analyses from 2008 are provided as Appendix B. Please also provide the latest sampling and analysis results completed as required for the HWB and the SWMU project.
6. **Section 1.3 Site Description and Operational History –**
 - A. Please provide additional details as to the operations at this facility regarding mission and activities at the site that would likely contribute to the makeup of the waste disposed in this cell.
 - B. The waste description as reported is incomplete; please explain from what type of buildings and materials these waste items originated from as all of these non-descript identifiers only raise concerns for asbestos-containing, PCBs, hazardous, munitions and radioactive wastes.
 - C. The only referenced NMED correspondence from January 2, 2014 is provided herein as Appendix A and simply references the NMED's (HWB) acknowledgement of the estimated volume of waste at 2,075 cubic yards. However, in the following paragraph, the HWB states the following, "*NMED agrees and notes that any waste or soil removed must be tested and characterized in accordance with a Department approved sampling and analysis plan (SAP) in accordance to 40 CFR 268.7 and 268.9 prior to disposal in a municipal landfill.*" This level of waste characterization is the type of information we would like to see for this WEP and to aid in making a waste acceptance determination for disposal at a Subtitle D landfill.
 - D. The last sentence of the last paragraph in this section presumes disposal of the excavated waste at a permitted municipal solid waste ("MSW") landfill, without further characterization and the possibility for the need to dispose of the waste at a hazardous waste facility.
7. **Section 1.4 Investigation Results –**
 - A. This section references the 2009 RFI Report and the sampling from 2008 and is compared to the NMED (and EPA) Soil Screening Levels ("SSL") Residential Standard from 2006. Please provide the updated sampling results from and since the 2015 Work Plan. Please note that the SSL for a Construction Worker Soil should also be assessed for the waste excavation project.

- B. Strontium is listed as a COC but the WEP does not detail whether or not it is the radioactive isotope or elemental form; if radioactive, then perhaps other radioactive isotopes are also contained in the waste. A New Mexico-permitted MSW landfill cannot receive radioactive waste. The analytical results provided are based on SSL not disposal acceptance criteria for such waste and/or constituents of concern.
8. Section 2.3 Contaminants of Concern –
- A. Soil – The first reference to a Sampling and Analysis Plan (“SAP”) is provided herein as related to the 2015 Work Plan. Please ensure that sampling and analysis are completed for disposal characterization for this WEP, to include representative TCLP, PCB, TPH, asbestos and radioisotope analyses of the waste or discuss how and why generator knowledge is sufficient to preclude additional laboratory analysis.
 - B. Surface Water – Control of storm water run-on into the excavation site and run-off away from the excavation site should both be addressed.
 - C. Direct Contact – Is relevant to the WEP to address the hazards and associated health risks to the on-site worker during the excavation project. Please address.
 - D. Air and Subsurface Gas – Is relevant to the WEP to address the hazards and associated health risks to the on-site worker during the excavation project. Please address. Demonstrate compliance with all applicable air monitoring requirements for protection of employees, types of air monitoring devices to be utilized, and frequency of sampling.
9. Section 3.2 Excavation –
- A. The last paragraph of this section states that the waste will be excavated and directly loaded in dump trucks for disposal. Please revise or remove this sentence as further characterization and/or segregation at a minimum will first be required. Please describe in detail how the waste will be removed, segregated, stockpiled, screened for COC’s in an exclusion zone, screening equipment used, and preventative measures to be taken to preclude soil, ground water or windblown contamination, and/or exposure to public.
 - B. The sentence that states that the waste material is expected to be non-hazardous based on information from the RFI is outdated and does not provide the level of characterization needed for a waste disposal determination.
 - C. The last sentence in this section states that wastes will be screened with a photoionization detector (“PID”) if needed and further states that based on the results of the RFI, volatile organic wastes are not anticipated. Air monitoring for exposures need to be addressed in the WEP to ensure protection to the on-site workers during the excavation project. List the types of air monitoring devices to be utilized and frequency of sampling. Include procedures to ensure worker safety during monitoring, sampling, and excavation activities. List the hazards, chemicals, and COCs that may be encountered, the potential health hazards, associated symptoms, and proposed response to such situations. Identify personnel that will be dedicated to such monitoring activities.
10. Section 3.3 Transport and Disposal –
- A. The third paragraph of this section should be moved to the introductory paragraph of this section. Additional characterization sampling and analysis is required for the SWB to assess and develop a preliminary determination for acceptance of the waste at a MSW landfill.
 - B. AC Trucking is identified as the commercial hauler of solid waste; however, this is not the proper name for the registered hauler. Please include the Hauler Registration Number, point of contact, telephone number, and address for AC & Company LLC or any other hauler that may be used.

Merle Miller, P.E.
March 1, 2017
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11. Section 4.0 Sampling and Analysis –

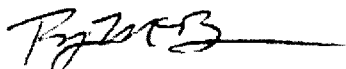
The WEP up to this section reads as though there will not be any additional confirmation sampling and analysis of the waste to be excavated and instead relies solely on the 2009 RFI Report and 2008 sampling and analysis reporting of various COCs and compared to the New Mexico SSL's residential clean up standard. In regard to Section 4.1, waste characterization sampling and analysis will be required if disposal at a New Mexico permitted solid waste facility is anticipated.

12. Please provide a letter from Otero Greentree Regional Landfill acknowledging that they will accept the excavated waste from the Oro Grande Landfill. The SWB acknowledges that the proposed landfill deferred preparing a waste profile for this waste until the SWB approves the WEP. Please understand that the landfill has the right to accept or deny the waste regardless of the SWB's review determination.

13. Please provide the anticipated days/hours of excavation activities, personnel shifts, and weather conditions that would impact the excavation project.

If you have any questions, please call me at (575) 915-1170 or you may reach me via electronic mail at ryanj.mcbee@state.nm.us.

Sincerely,



Ryan J. McBee
Solid Waste Bureau, Enforcement Officer, EA-III

Enclosure – Waste Excavation Checklist

RJM:gwa:gs:tdm

cc: Chuck Akeley, Manager, Enforcement Section, Solid Waste Bureau *[via electronic mail]*
George Schuman, Manager, Permit Section, Solid Waste Bureau *[via electronic mail]*
Teri Monaghan, Enforcement Coordinator, Solid Waste Bureau *[via electronic mail]*

Cobrain, Dave, NMENV

From: Cobrain, Dave, NMENV
Sent: Tuesday, March 13, 2018 11:46 AM
To: 'ronald.h.baca.civ@mail.mil'
Cc: 'rita.f.crites1.civ@mail.mil'; 'sylvia.a.waggoner.civ@mail.mil'; Kieling, John, NMENV
Subject: Waste Excavation Plan FTB-014 (SWMU-25) Oro Grande Landfill, Fort Bliss, New Mexico

Ron,

I just received notification from the New Mexico Environment Department Solid Waste Bureau (SWB) that a document titled *Waste Excavation Plan FTB-014 (SWMU-25) Oro Grande Landfill, Fort Bliss, New Mexico* was submitted to the SWB for review in February 2017. The site is a SWMU listed on the Ft Bliss RCRA permit and all corrective action must be accomplished through the Hazardous Waste Bureau (HWB); therefore the work plan must be submitted to the HWB for review and approval since the SWB does not have authority over the site. Please submit the work plan to the Hazardous Waste Bureau for review. Should the work be conducted under an inappropriate authority, it will not be accepted as a basis for a Corrective Action Complete determination and will remain on the Ft Bliss RCRA permit, if a petition is submitted to change the corrective action status of the site. Please notify your contractor that the work plan was submitted to the wrong NMED Bureau for review and ask them to submit the work plan to the Hazardous Waste Bureau. Please call if you have questions.

Thank you.

Dave Cobrain
Program Manager
Hazardous Waste Bureau

Direct office phone: 505-476-6055
Main HWB phone: 505-476-6000
Fax: 505-476-6030