



NEW MEXICO
ENVIRONMENT DEPARTMENT



ENTERED



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

April 12, 2019

Jesus Moncada
Chief, Compliance Branch
US Army Fort Bliss Garrison
DPW-Environmental Division
Building 622, Taylor Road
Fort Bliss, TX 79916-3812

**RE: APPROVAL WITH MODIFICATIONS
WASTE EXCAVATION PLAN
FTB-014 (SWMU-25) ORO GRANDE LANDFILL
FORT BLISS, NEW MEXICO
EPA ID #NM4213720101
HWB-FB-18-001**

Dear Mr. Moncada:

The New Mexico Environment Department (NMED) has reviewed the Department of Army (Permittee) *Waste Excavation Plan FTB-014 (SWMU-25) Oro Grande Landfill Ft. Bliss, New Mexico* (Work Plan), dated March 2018. NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

Comment 1

Note that the site is a solid waste management unit (SWMU) regulated under Resource Conservation and Recovery Act (RCRA) and the regulatory authority is the NMED Hazardous Waste Bureau (HWB). All reports and work plans associated with the SWMU must be submitted to the HWB. The Work Plan was initially submitted only to the NMED Solid Waste Bureau (SWB) on February 22, 2017 for review, and later submitted to the HWB on March 26, 2018. The Permittee should have submitted the Work Plan to the HWB concurrently with the SWB. The SWB reviewed the Work Plan and issued a comment letter on March 1, 2017 and required a response to the SWB. Submit the response sent to the SWB to the HWB along with

any other correspondence.

Comment 2

The text of the electronic copy of the Work Plan on the compact disc (CD) is not consistent with the text of the hard copy. For example, the electronic copy includes eight references in Section 5.0 while the hard copy includes only six. Provide the correct revision of the Work Plan in hard copy or electronic format as appropriate.

Comment 3

In Section 1.1, *Corrective Measures Objectives and Scope*, the Permittee states, “[t]he scope of this corrective action is 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.” Section 1.3 of the *Corrective Action Work Plan*, dated December 2015, which was approved with modifications by NMED on May 13, 2016, similarly states, “[t]he scope of this corrective action is 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 with native plants.” The scope of the two documents is identical. Since the December 2015 *Corrective Action Work Plan* was already approved, clarify the purpose of submitting the same document for review in a response letter. All field work must be conducted in accordance with the December 2015 NMED-approved work plan.

Comment 4

In Section 1.4, *Previous Investigations*, the Permittee states, “[a]rsenic, barium, chromium, and lead were detected as high as 4.81 milligrams per kilogram (mg/kg), 176 mg/kg, 13.3 mg/kg, and 5.9 mg/kg, respectively, all below background concentrations for the respective metals (TPG, 1997).” Unless an approved site-specific metal background study was conducted, it is not appropriate to reference background metal concentrations or use them for comparison. In the future, the Permittee must evaluate risks associated with metal detections using residential and industrial/occupational soil screening levels (SSLs) in the NMED’s *Soil Screening Guidance for Human Health Risk Assessments* (Guidance), dated February 2019.

Comment 5

In Section 1.4.1, *RFI Soil Sampling Results*, the Permittee states, “[a]rsenic was detected in soil sample F14-SB-5 at 4.01 mg/kg, just above the NMED SSL-Residential concentration of 3.9 mg/kg. Although above the U.S. Environmental Protection Agency (USEPA) Region 6 Residential SL level of 0.39 mg/kg, the arsenic detection was below the USEPA Region 6 background range for arsenic of 1.1 to 16.7 mg/kg. The sample was collected from 28-30 feet bgs, well below the observed wastes, and well below the projected excavation depth. Arsenic was considered to be the result of naturally occurring conditions, and not due to a release from the landfill.” It is not appropriate to reference background metal concentrations unless site-specific study is conducted and approved (see Comment 4). The residential SSL for arsenic is listed as 7.07 mg/kg in the 2019 Guidance and the detected arsenic level was below the SSL. Additionally, the soil sample was collected at a depth below ten feet ground surface and exposure risks are negligible. Rather than include the discussion of background metal

concentrations, evaluate the site's metal concentrations using residential and industrial/occupational SSLs in the future reports and work plans, where applicable.

Comment 6

In Section 3.3, *Transport and Disposal*, the Permittee states, “[i]f asbestos containing materials (ACM) are encountered, CAPE will subcontract a licensed company to handle ACM IAW appropriate guidelines, and will dispose of them at a licensed disposal facility.” Appendix D, *Sampling and Analysis Plan Addendum*, presents the analytical suite for excavation confirmation samples; however, asbestos is not included. If ACM could be present in the excavated material, asbestos analysis must also be included in the confirmation analytical suite. Address the requirement if suspect ACM is observed during excavation in the response letter.

Comment 7

Appendix D, *Sampling and Analysis Plan Addendum*, presents the analytical suite for excavation confirmation samples. They are volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, pesticides, herbicides, polychlorinated biphenyls (PCBs) and total petroleum hydrocarbons-diesel range organics (TPH-DRO). Soil samples must also be collected for dioxins/furans, explosive compounds and perchlorate. Include analyses for dioxins/furans by EPA Method 8290A, explosive compounds by EPA Method 8330A, and perchlorate by EPA Method 6850. Address the requirement for the additional analyses in the response letter.

Comment 8

The Work Plan does not include a schedule for the up-coming field activities. Provide a timeline of the anticipated field work implementation, completion and report submission dates in the response letter.

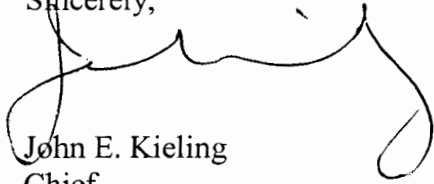
The Permittee must address all comments in this Approval with Modifications and submit a response letter and required documents, as necessary, no later than **May 31, 2019**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Mr. Moncada
April 12, 2019
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If you have any questions regarding this letter, please contact Michiya Suzuki (505) 476-6059.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large loop at the end.

John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
T. Monaghan, NMED SWB
L. King, EPA, Region 6 (6MM-RC)

File: 2019 Ft. Bliss (SWMU 25) WEP
HWB-FB-18-001