

 **ENTERED**



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau**

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

December 27, 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
DRAFT FINAL CORRECTIVE MEASURES COMPLETION REPORT
FTB-014 (SWMU 25) ORO GRANDE LANDFILL
FORT BLISS, NEW MEXICO
EPA ID #NM4213720101
HWB-FB-19-004**

Dear Mr. Moncada:

The New Mexico Environment Department (NMED) is in receipt of the Fort Bliss (Permittee) *Draft Final Corrective Measures Completion Report FTB-014 (SWMU 25) Oro Grande Landfill* (Report), dated August 2019. NMED has reviewed the Report and hereby issues this Approval with Modifications. The Permittee must address the following comments.

1. Executive Summary, page 1-1

Permittee Statement: "The WEP [(Waste Excavation Plan)] was approved by the New Mexico Environment Department (NMED) Solid Waste Bureau (NMED, 2018)."

NMED Comment: 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

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NMED Hazardous Waste Bureau (HWB). All submittals associated with the SWMU must be submitted to the HWB. Also, refer to Comment 1 in the NMED's *Approval with Modifications Waste Excavation Plan FTB-014 (SWMU-25) Oro Grande Landfill Ft. Bliss, New Mexico*, dated April 12, 2019.

2. Section 2.3, Site Description and Prior Investigations, page 2-1

Permittee Statement: "The waste material comprising the landfill was reported to consist of concrete, glass, building materials, plastic, wiring, packaging materials, and demolition debris. Reportedly, some waste material may have been burned."

NMED Comment: Dioxins may be generated when plastic materials are burned. The analytical suite for the landfill excavation confirmation samples did not include the analysis of dioxins according to Appendix C, *Laboratory Data Evaluation and Quality Assurance Reports*. The analysis of dioxins and furans using EPA Method 8290A was required for the confirmation samples according to Comment 7 in the NMED's *Approval with Modifications Waste Excavation Plan FTB-014 (SWMU-25) Oro Grande Landfill Ft. Bliss, New Mexico*, dated April 12, 2019. Additionally, Comment 7 in the NMED's *Approval with Modifications* states, "[s]oil 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." The direction stated in the comment was not followed during the field investigation. Submit a work plan to propose to install: (1) 12 borings to the interface of the backfill and native soil in the same locations where the bottom confirmation soil samples were collected and (2) 16 borings to the same depths at the step-out locations where the side-wall confirmation samples were collected as shown in Figure 5, *Confirmation Sample Locations*, and collect soil samples at the interface between backfill and native soils for the required laboratory analyses.

3. Section 2.4, Project Plans, page 2-2

Permittee Statement: "The WEP was approved by the NMED Solid Waste Bureau on 25 October 2018."

NMED Comment: NMED issued the *Approval with Modifications Waste Excavation Plan FTB-014 (SWMU-25) Oro Grande Landfill Ft. Bliss, New Mexico* on April 12, 2019. The letter directed the Permittee to submit a response letter no later than May 31, 2019; however, NMED has not received the response letter from the Permittee. The Permittee must submit the response letter ~~no later than January 31, 2020~~ or submit an extension request letter to change the submittal date.

4. Section 3.3, Regional Hydrogeology, page 3-1

Permittee Statements: "Groundwater is estimated to be at depths between 250 and 500 feet bgs at this site."

and,

"Four clustered wells (USGS-323759106195201, USGS-323759106195202, USGS 323759106195301, and USGS-323758106195301) are approximately 20 miles to the northwest and are completed 49 – 65 bgs."

NMED Comment: The latter statement potentially indicates that the depth to groundwater at the site is shallower than the estimated depth to groundwater (250 – 500 feet bgs). The depth to groundwater must be confirmed at the site. Submit a work plan to propose to install an exploratory boring to determine the depth to groundwater at the site and collect groundwater samples to determine whether or not the groundwater beneath the site was affected by the activities associated with waste disposal or provide information to clarify the depth to groundwater beneath the site.

5. Section 4.8, Backfill, page 4-4

Permittee Statement: "Prior to borrow pit excavation, munitions debris was observed on the surface of Borrow Pit #2."

NMED Comment: Since munitions debris was observed on the surface of Borrow Pit #2, residual explosive compounds and perchlorate may potentially be present in the backfill material. Submit a letter work plan to propose to collect a minimum of five samples from the backfill soil for analyses of explosive compounds and perchlorate.

6. Section 5.0, Sampling Procedures and Analytical Methods, page 5-1

Permittee Statement: "Analytical results are discussed in Section 5, and Laboratory Data Reports are included in Appendix C."

NMED Comment: Analytical results are discussed in Section 6, rather than Section 5. Correct the typographical error and provide a replacement page.

7. Section 6.1.1, Waste Characterization Samples, Total Petroleum Hydrocarbons, page 6-1

Permittee Statement: "All other analytical results for TPH-DRO were less than 100 mg/kg. Soil sampling locations are shown on Figure 5."

NMED Comment: Section 6.1.1 discusses the analytical results for waste characterization samples. However, the referenced Figure 5 depicts confirmation sampling locations. Figure

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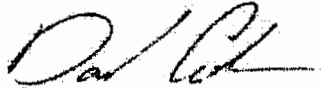
4 depicts waste characterization sampling locations. Correct the typographical error and provide a replacement page.

The Permittee must address all comments in this Approval with Modifications and submit a response letter with replacement pages no later than **June 30, 2020**. In addition, the Permittee must submit a work plan required by Comments 2, 4 (if necessary) and 5 must be submitted to NMED no later than **August 31, 2020**.

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.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6059.

Sincerely,



Dave Cobrain
Acting Bureau Chief
Hazardous Waste Bureau

cc: K. VanHorn, NMED HWB
M. Suzuki, NMED HWB
L. King, EPA, Region 6 (6LCRRC)
R. Crites, Fort Bliss

File: FB 2019 and Reading, FB-19-004