



**NEW MEXICO  
ENVIRONMENT DEPARTMENT ENTERED**  
**Hazardous Waste Bureau**



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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 19, 2021

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

**RE: POST-CONSTRUCTION BACKFILL SAMPLING REPORT 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) has reviewed the Fort Bliss (Permittee) *Post-Construction Backfill Sampling Report Draft Final Corrective Measures Completion Report FTB-014 (SWMU 25) Oro Grande Landfill* (Report), dated January 11, 2021. NMED has reviewed the Report and hereby issues the comment below.

Since munitions debris (MD) was observed on the surface of Borrow Pit #2, the NMED's *Responses to Corrective Measures Completion Report FTB-014 (SWMU 25) Oro Grande Landfill*, dated August 3, 2020, required the Permittee to collect a minimum of five soil samples from the backfill for analyses of explosive compounds and perchlorate. Accordingly, the Permittee collected five backfill soil samples on October 28, 2020 and these samples were analyzed for explosive compounds and perchlorate. The Report states, "[a]s all analytical results were below

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NMED residential soil screening levels for explosive compounds and perchlorate, the former Oro Grande Landfill is cleared for approval of the Corrective Measures Completion Report and Site Closure.”

Since MD may potentially be contained in the backfill and exposed on the ground surface over time (e.g., erosion), unrestricted use of the site is not appropriate. NMED does not agree to unrestricted land use because removal of 100% of MD is not guaranteed. The Permittee must conduct biennial visual surveys of the SWMU 25 and remove any exposed MD. The Permittee must implement institutional controls at the site including posting warning signs and must restrict the access to the site.

Following each biennial inspection and/or removal of MD, the Permittee must submit a report documenting the results of the visual survey. The report must include a map depicting the area inspected and the location(s) of any identified MD removed during the inspection. All such reports must be submitted by December 31<sup>st</sup> of the inspection year. The first report must be submitted no later than **December 31, 2022**.

Should you have any questions, please contact Michiya Suzuki of my staff at (505) 476-6046.

Sincerely,

Kevin Pierard

Digitally signed by Kevin  
Pierard  
Date: 2021.03.19 10:11:54  
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Kevin M. Pierard, Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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