



BILL RICHARDSON
Governor

DIANE DENISH
Lieutenant Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT



ENTERED



Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

RON CURRY
Secretary

SARAH COTTRELL
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 20, 2010

Thomas A. Ladd
Department of the Army
US Army Garrison White Sands
100 Headquarters Avenue
White Sands Missile Range, New Mexico 88002-5000

**RE: REVIEW OF AMRAD FACILITY VOLUNTARY CORRECTIVE ACTION
REPORT FOR AMRAD UST SITE (SWMU 164)
WHITE SANDS MISSILE RANGE, EPA ID NO. NM2750211235
HWB-WSMR-05-003**

Dear Mr. Ladd:

The New Mexico Environment Department (NMED) has reviewed the Department of the Army's (Permittee) *AMRAD Facility Voluntary Corrective Action Report for AMRAD UST Site (SWMU 164)* (Report) and related documents. The Report, documenting the Permittee's voluntary corrective action at Solid Waste Management Unit (SWMU) 164, was approved by the NMED on September 12, 2006.

Waste motor oil that was generated during maintenance of a large radar dish was stored in a 3,000 gallon underground storage tank (UST) that leaked an unknown amount of waste oil. Total Petroleum Hydrocarbon (TPH) in the motor oil range was the only detected contaminant of concern. The data indicate that the extent of the oil contamination is confined to fill/soil around the UST at depths less than ten feet below ground surface (bgs).

The UST was not removed due to the presence of a large concrete anchor, located beneath the UST (10 ft bgs), supporting a large radio frequency fence. The existing anchor could not safely be uncovered during removal action in a manner that would not threaten the structural integrity

of the radar receiver and supports. The UST and fill pipes were filled with low grade cement and sealed so that they could not be used again. NMED understands that removing the UST would endanger the integrity of the anchor. However, it was not clear that the contaminated fill/soil surrounding the UST could not be removed safely.

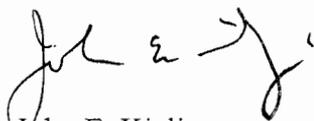
In the Approval Letter dated September 12, 2006 NMED suggested that the Permittee use more recent guidance to assess areas of soil contaminated with petroleum hydrocarbons. NMED also indicated that no corrective action for SWMU 164 was necessary at that time due to the presence of the underground anchor located beneath the UST and that the SWMU will remain on the permit until the site is remediated to current regulatory standards.

In order to remove SWMU 164 from the permit the Permittee must remediate soil that is contaminated with petroleum hydrocarbons at concentrations greater than 2,500 mg/kg, the value indicated for residential direct exposure in Table 2a of the NMED TPH Screening Guidelines, October 2006. According to the Report, such soil is limited to areas of hand-augured soil samples identified as S, SW, North, NE, NW and #9 and to a depth of 8.33 feet bgs. SWMU 164 must remain on the permit until the contaminated soil is removed or otherwise remediated.

Without remediating the contaminated soil, the Permittee may apply for a Corrective Action Complete with Controls status for SWMU 164. The Permittee must clearly state the reason that soil cannot be remediated and describe the controls that will remain in place to limit human and ecological exposure to the contaminated soils. NMED will require remediation of the contaminated soil when the facility is demolished or otherwise modified to eliminate the need for the anchor.

If you have any questions regarding this letter, please call Pat Stewart at (505) 476-6059.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
K. Van Horn, NMED HWB
N. Dhawan, NMED HWB
P. Stewart, NMED HWB
L. King, EPA Region 6 (6PD-N)
B. Avalos, WSMR
R. Peters, WSMR

File: HWB-WSMR-05-003 and Reading