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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JULY 8, 2020

Brian D. Knight
Environmental Division (Building 163)
U.S. Army White Sands Missile Range
White Sands Missile Range, NM 88002-5000

**RE: APPROVAL WITH MODIFICATIONS
ACCELERATED CORRECTIVE ACTION WORK PLAN
SWMUS 121, 122, AND 123 STALLION ASPHALT TANKS
WHITE SANDS MISSILE RANGE, NEW MEXICO
EPA ID #NM 2750211235
HWB-WSMR-20-002**

Dear Mr. Knight:

The New Mexico Environment Department (NMED) has received White Sands Missile Range (Permittee) *Accelerated Corrective Action Work Plan, SWMUs 121, 122, and 123, Stallion Asphalt Tanks* (Work Plan), dated February 2020 and received February 12, 2020. NMED has reviewed the Work Plan and hereby issues this Approval with Modifications.

The Permittee must submit an investigation report summarizing the results of the implementation of this Work Plan no later than **January 31, 2020**. The report must address all of the comments included in this Approval with Modifications. The investigation report must be submitted to NMED in the form of two hard copies and one electronic copy.

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.

MODIFICATIONS:

1. **NMED Comment:** The Work Plan and related documents do not describe the current conditions at Solid Waste Management Units (SWMUs) 121, 122, and 123. For example, it is not clear if clean fill was used to backfill the site after the 1993 excavation activities at SWMUs 121 and 122. The Permittee must record site conditions prior to initiating the activities proposed in the Work Plan and adjust sampling locations and depths as appropriate to determine the presence or absence of residual contamination in the area of SWMUs 121, 122, and 123. The site conditions must be described in detail in the investigation report.
2. **NMED Comment:** The Permittee proposes to collect soil samples from 0 to 1, 2 to 3, and 5 to 6 feet below ground surface (ft bgs); however, it is not clear what the Permittee considers the ground surface. The three asphalt tanks, each approximately 26 feet long and 9 feet in diameter, were reportedly installed sub-grade on a terraced hill with soil extending halfway up the northern sides of the tanks and approximately one eighth of the way up the southern sides of the tanks. In 1993, tanks 1 and 2 (SWMUs 121 and 122) were removed and some of the asphalt contaminated soil beneath and around tanks 1 and 2 was excavated to a depth of 3 feet. As mentioned in Comment 1, there is no information presented in project documents that indicate if the excavated area was backfilled and regraded in 1993. The Permittee must define and justify the point of reference used to establish sampling depths relative to where the tanks were located and where asphalt in the subsurface was identified during previous investigations. The Permittee must differentiate between the selection of sample depths where soil was excavated (tanks 1 and 2) and where no soil has been excavated (tank 3). Use a specific reference term other than "below ground surface" to describe the point of reference for sampling depths, such as, "below depth of 1993 excavation". If the Permittee finds that any portion of the site was backfilled and regraded, they must provide a description in the investigation report of how the bottom of the previous excavation was located.
3. **NMED Comment:** The Permittee reports that tank 3 (SWMU 123), which contained one foot of solidified asphalt primer, was removed at an unknown date sometime after 1993. A records search by the Permittee did not yield information regarding the removal, transport, or disposition of tank 3 or its contents. The Work Plan describes activities to conduct a geophysical survey to confirm the presence or absence of tank 3 in the subsurface of SWMU 123. The Permittee must expand the ground penetrating radar search to investigate for ancillary equipment (e.g., asphalt heaters, fuel tanks) and collect samples for chemical analysis for the fuel type used, if applicable.
4. **NMED Comment:** Section 6.10, Confirmation Soil Sampling, does not include metals or PCBs in the analytical suite for confirmation sampling. Other sections of the Work Plan, including Table 5-1, Summary of the Proposed Field Work for Additional Corrective

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Action, do include metals and PCBs. The Permittee must ensure that confirmation samples are also analyzed for metals and PCBs.

Should you have any questions or wish to meet with us to discuss these comments, please contact Rob Murphy at (505) 795-1403.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Pierard" with a stylized flourish at the end.

Kevin Pierard
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
R. Murphy, NMED HWB
B. Avalos, WSMR
L. King EPA Region 6 (GLCRRC)

File: WSMR 2020 Stallion Asphalt Tanks and Reading