

RED FB/02



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PETER MAGGIORE
SECRETARY



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 22, 2002

Mr. Keith Landreth
USAADACENFB
Attn: ATZC-DOE (200)
1733 Pleasonton Road
Fort Bliss, TX 79916-6816

**SUBJECT: ADDITIONAL INVESTIGATIONS FOR FTBL-013/SWMU-18,
FTBL-012/SWMU-27, FTBL-011/SWMU-29 AT FORT BLISS
MILITARY RESERVATION NEW MEXICO
U.S. ARMY AIR DEFENSE ARTILLERY CENTER AND FORT
BLISS (EPA ID No. NM4213720101-01)
[FB-01-001]**

Dear Mr. Landreth:

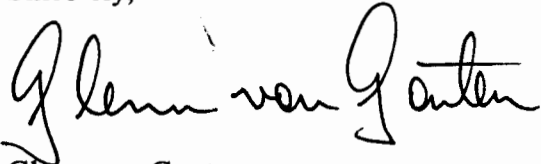
The New Mexico Environment Department (NMED) has reviewed Fort Bliss' July 19, 2001 Workplan submitted as a Voluntary RFI Workplan. Fort Bliss undertook this investigation at risk; therefore, NMED is providing Fort Bliss with comments for your consideration when preparing your RFI Report. NMED's numbered comments are included as Attachment 1.

The New Mexico Hazardous Waste Management Fee Regulations (20.4.2 NMAC) require assessment of fees when review of a document is complete. NMED has determined that a workplan for voluntary investigation undertaken at risk is equivalent to a "Voluntary Corrective Action (VCA) Plan or Report" and, accordingly, will assess Fort Bliss the same fee (see Table 2.5 to 20.4.2.200.G NMAC). NMED will issue an invoice to you under a separate letter. Payment is due within sixty (60) calendar days from the date that you receive the invoice. If you need to request an extension of the sixty-day period, the request must be received by NMED a

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minimum of fourteen (14) calendar days prior to the end of the sixty-day period. If you disagree with the fee assessed, you may file an Administrative Appeal under the provisions of 20.4.2.300.B NMAC. If you have any questions concerning this review, please call me at 505-428-2551.

Sincerely,



Glenn von Gonten
Fort Bliss Project Leader
RCRA Permits Management Program

GvG:dkb

[FB-01-001]

Attachment (1)

cc: D. Dodge, Fort Bliss
L. King, EPA Region 6
J. Harris, EPA Region 6
J. Bearzi, NMED HWB
J. Kieling, NMED HWB
D. Bowman, NMED HWB
D. Cobrain, NMED HWB
P. Allen, NMED HWB
Reading File, FB Red File, FB HSWA FILE

ATTACHMENT 1

Section 2.3, pg 4. **Comment 1:** Fort Bliss states that Figure 4 shows the landfills LF-1, LF-2, and the surface burn area. Figure 4 is a large-scale picture of the area and it is not clear where the mentioned sites are located. Figure 5 better delineates these sites. Fort Bliss also states that samples were collected and analyzed from the landfills LF-1, LF-2, and the surface burn area for TPH, PAH, VOC, and total metals. Fort Bliss provided only the analytical results for lead from the sites LF-1 and LF-2. Fort Bliss should also include the rest of the analytical results for this SWMU.

Section 4.1, pg 8. **Comment 2:** Please, change "Figure 6" to "Figure 8" in the last paragraph.

Section 4.5, pg 12. **Comment 3:** Fort Bliss refers to the locations of the new borings in Figures 2, 3, and 8 and suggests that a sufficient number of borings have been advanced in these landfills to allow Fort Bliss to describe the lateral extent of a potential release. However, the south border of zone #13 lacks a soil boring, the west sides of zone #4 and #6 lack any borings, as well as the very north side of the zone adjacent to the vegetation (see Figure 2). The south sides of the zones #3 and #4 lack borings, as well as the north and west side of that whole landfill area with the exception of soil boring SB27-2 (see Figure 3). The locations of the borings do not need to follow a specific grid but must be appropriately sited to detect potential releases that might have occurred outside the landfill area.

Section 4.7, pg 17. **Comment 4:** Section 4.7 describes a sampling program starting at 5 feet below the base of the landfills. Please specify whether Fort Bliss will collect samples for chemical analysis before the base of the landfill is reached based on OVM readings while the borings are being advanced.

Section 4.7.6, pg 19. **Comment 5:** Fort Bliss states that 40% of the total-depth soil samples will be analyzed for the full-suite of parameters and that their locations will be determined by geographic distribution. NMED recommends that Fort Bliss consider not specifying a fixed percentage for full-suite analysis at total-depth. The number of full-suite analysis samples and their locations should be determined from the preliminary OVM readings, BTEX, and DRO-TPH results and, therefore, more than 40% of the total-depth samples might require the full-suite analysis.

Section 4.7.6, pg 19. **Comment 6:** Fort Bliss states that full-suite analysis at shallower depth could be done under certain conditions but only one depth per boring will be analyzed for the full-suite parameters. NMED recommends that the decision for full-suite analysis at shallower depth should be done on a boring-specific basis to account for variations in contaminant type and concentrations.

Section 4.9, pg 21. **Comment 7:** Fort Bliss states that 10% of the soil samples for full-suite analysis will be collected in duplicate. To ensure proper Quality Assurance/Quality

Control, Chapter One of SW-846 recommends that the following samples be analyzed with each batch of samples (a batch may not exceed 20 samples):

- Field duplicate – one per batch;
- Equipment rinsate - one per batch required when non-disposable equipment is being used and one per day if disposable equipment is being used;
- Trip blank – one per day, volatile organics only.