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FLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
HEADQUARTERS, U. S. ARMY GARRISON COMMAND  
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FORT BLISS, TEXAS 79916-6816

ENTER

IMWE-BLS-Z

July 2, 2007

James Bearzi, Chief  
State of New Mexico, Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive, East Building 1  
Santa Fe, New Mexico 87505-6303



**RE: Request for Clarification  
Notice of Deficiency (NOD)  
RCRA Facility Investigation Work Plan  
Oro Grande Landfill (SWMU-25/FTBL-14)  
Fort Bliss, New Mexico, EPA ID#NM4213720101-01**

Dear Mr. Bearzi:

The Fort Bliss Directorate of Environment (DOE) requests clarification on comments contained in the Notice of Deficiency (NOD) dated March 21, 2007 from the New Mexico Department of Environmental Quality (NMED) pertaining to the Final RCRA Facility Investigation (RFI) Work Plan, Oro Grande Landfill (SWMU-25/FTBL-14), Fort Bliss, New Mexico, EPA ID# NM4213720101-01, HWB-FB-06-001. The final work plan, dated November 2006, was prepared to incorporate revisions based on the responses to comments to the NMED NOD dated July 24, 2006.

The following clarifications on the March 21, 2007 NOD on the revised final work plan are requested:

**Comment 5:** *Inorganic constituents other than the eight RCRA metals may have been released from the landfill and would more likely occur deeper than two feet below the ground surface.*

*The Permittee must revise their sampling strategy to specify that soil samples will be analyzed for all inorganic constituents listed in 40 CFR 261 appendix VIII. The work plan must also be revised to include activities for the establishment of background concentrations in subsurface soils (> 0.5 feet below ground surface), in addition to surface soils (0 to 0.5 ft interval). Soil from specific horizons must be compared to background concentrations calculated from the same or comparable soil horizon.*

The eight RCRA metals were selected for analysis during the RFI because these have been identified as chemicals of concern (COC) for the Oro Grande Landfill based on historical information and the findings from previous investigations.

Comment 5 directs the DOE to revise the work plan to expand the soil sample analyses to include “all inorganic constituents listed in 40 CFR 261 Appendix VIII.” The DOE requests that NMED explain the rationale for expanding this list to include other analytes that have not been identified as COCs. Additionally, 40 CFR 261 Appendix VIII presents a list of more than 500 chemicals. The DOE requests that NMED provide a listing of the requested inorganic constituents.

Comment 5 further directs the DOE to revise the work plan to include activities for the establishment of background concentrations in subsurface soils (more than 0.5 feet below ground surface) and surface soils (0 to 0.5 feet interval). The NMED guidance document, *Technical Background Document for Development of Soil Screening Levels (Page 36, Revision 4.0, June 2006)*, indicates that surface soil may be defined as extending to a depth of approximately two feet below ground surface. This varies from Comment 5 which indicates that surface soils are within the 0 to 0.5 feet interval.

The U.S. Environmental Protection Agency (USEPA) Region 6 guidance for the establishment of Medium-Specific Screening Levels provides a table with one set of background concentrations in soils that are appropriate for comparison to both surface and subsurface soils (*Medium-Specific Screening Level, USEPA, Region 6, December 2006, page 33*). The DOE requests that NMED provide the technical background and guidance for the establishment of more than one set of soil background concentrations (surface and subsurface) at the Oro Grande Landfill.

Finally, does the term “soil horizon” in Comment 5 pertain to physically distinct layers in the soil profile as classified by the United States Department of Agriculture (USDA) Taxonomy or does the term refer to intervals based only on a predetermined depth below the ground surface?

***Comment 6:*** *The Permittee states in Section 4.4.3 that soil samples collected from background will be composited.*

*The work plan must be revised to state that soil samples used to calculate background will be composited only if they are from comparable soil horizons.*

See the request for clarification on the term “soil horizon” for Comment 5 above.

## Request for Extension

The DOE requests an extension for submittal of the revised final work plan to 90 days after the clarification of the issues related to the March 21, 2007 NOD.

Following receipt of clarification, the DOE will prepare a table of comments and responses for the March 21, 2007 NOD. The table of responses will be delivered to the NMED for review and for approval prior to preparation of the final work plan.

Sincerely,



Keith Landreth, Director  
Directorate of Environment

cc: Ron Baca, Fort Bliss  
Sylvia Waggoner, Fort Bliss  
Rick Smith, USACE – Tulsa District  
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