

FB 07



**BILL RICHARDSON**  
GOVERNOR

**State of New Mexico**  
**ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Telephone (505) 476-6000  
Fax (505) 476-6030  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)

ENTERED



**RON CURRY**  
SECRETARY

**CINDY PADILLA**  
DEPUTY SECRETARY

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

July 25, 2007

Keith Landreth  
Attn: ATZC-DOE (Landreth)  
Bldg. 624  
1733 Pleasanton Rd.  
Fort Bliss, New Mexico 79916-6812

**RE: RESPONSE TO REQUEST FOR CLARIFICATIONS &  
EXTENSION APPROVAL FOR THE SUBMITTAL OF  
A REVISED RCRA FACILITY INVESTIGATION (RFI) WORK PLAN  
SWMU-25 ORO GRANDE LANDFILL  
FORT BLISS, NEW MEXICO, EPA ID# NM4213720101-01**

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has received the Department of the Army's (Permittee) July 2, 2007 letter requesting clarification on comments contained in the NMED's March 21, 2007 Notice of Deficiency (NOD). NMED's clarifications were discussed during the June 28, 2007 meeting and are reiterated below.

**Comment 5**

The Permittee states that the eight RCRA metals were selected for soil analysis because they were identified as chemicals of concern based on historical information and findings from previous investigations. The Permittee has identified only a small portion of the wastes in the Oro Grande Landfill. The Permittee has not sampled the soil beneath the landfill for all inorganic constituents nor has the Permittee sampled the soil in all locations where a release from the landfill is most likely to occur. It is still unknown if other inorganic constituents are present because the Permittee analyzed soil samples for a limited analytical suite.

The Permittee must analyze soil samples for all the target analyte list metals listed for SW-846 Method 6010B, and also cyanide.

Keith Landreth  
July 25, 2007  
Page 2 of 3

The Permittee also mentioned that Comment 5 and NMED's guidance document titled *Technical Background Document for Development of Soil Screening Levels* vary in the definition of surface soil. The difference between surface and subsurface soil as per NMED's guidance is based on exposure levels to hazardous constituents. This differs from surface and subsurface soil distinguished based on chemical and textual differences.

The thickness of surface soil varies in different locations depending on soil classification and genesis. Typically, certain soil horizons (as classified by the U.S. Department of Agriculture, Natural Resources and Conservation Service Taxonomy) are zones of accumulation and other horizons are zones of leaching. Most metals tend to accumulate in the surface soils, unless the environment is acidic, which allows metals to travel further down the soil profile. It is logical and advantageous to calculate at least two different background values for a site based on soil types and horizons.

NMED requires the Permittee to calculate separate background values for surface and subsurface soils (based on soil taxonomy) at the site.

#### **Comment 6**

The term "soil horizon" is defined by the U.S. Department of Agriculture, Natural Resources and Conservation Service and does not refer to intervals based on a predetermined depth below the ground surface.

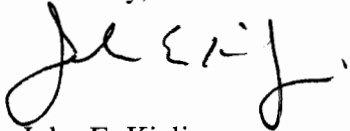
#### **Request of Extension**

On the last page of the Request of Clarification letter, the Permittee requests an extension of an additional 90 days to submit a revised RCRA Facility Investigation Work Plan for Solid Waste Management Unit (SWMU) 25, Oro Grande Landfill. NMED hereby approves the 90 day extension request. The Permittee must submit the revised work plan and responses to NMED's March 21, 2007 Notice of Deficiency comments no later than September 23, 2007. The Permittee was late in their extension request and, in the future, must take all necessary steps to ensure that further delays do not occur.

Keith Landreth  
July 25, 2007  
Page 3 of 3

If you have any questions regarding this letter, please contact Cheryl Frischkorn at (505) 476-6058.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke.

John E. Kieling  
Manager  
Permits Management Program  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
C. Frischkorn, NMED HWB  
Ron Baca, Ft. Bliss  
File: FB 2007 and Reading File