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NEW MEXICO ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 12, 2009

Mr. Keith Landreth
Attention of: IMWE-BLS-PWE
Building 624
DPW – Environmental Division
1733 Pleasonton Road
Fort Bliss, TX 79916-6816

RE: NOTICE OF DISAPPROVAL
WASTEWATER SAMPLING RESULTS REPORT FOR MARCH 2009, SEMI-ANNUAL WASTEWATER COMPLIANCE SAMPLING FOR MEYER AND DOÑA ANA – NEW MEXICO RANGE OUTFALLS AND WASTEWATER FLOW MONITORING REPORTS APRIL 2009 – OCTOBER 2008 FOR MEYER AND DOÑA ANA - NEW MEXICO RANGE OUTFALLS
EPA ID #NM4213720101
HWB-FB-09-003

Dear Mr. Landreth:

The New Mexico Environment Department (NMED) has received Fort Bliss's *Wastewater Sampling Results Report for March 2009, Semi-Annual Wastewater Compliance Sampling for Meyer and Doña Ana – New Mexico Range Outfalls and Wastewater Flow Monitoring Reports April 2009 – October 2008 for Meyer and Doña Ana - New Mexico Range Outfalls* (Report), dated March, 2009 and received June 4, 2009. NMED has completed its review of the Report and hereby issues this Notice of Disapproval (NOD). The following comments must be addressed by the Permittee by making revisions to the Report.

1. Table 3-2 of the Report (page 8) contains footnote "1" associated with Meyer and Doña Ana composite samples for total suspended solids (TSS); however, neither the Report text nor the table's footnotes define what footnote "1" represents. The Permittee must submit a revised Table 3-2 either explaining the footnote or deleting it if it is not applicable to the table for the reporting period.

2. Table 3-3 of the Report (page 8, not page 9 as indicated in the Report's Table of Contents [TOC]) indicates the field blank associated with sampling on March 31, 2009 contained aluminum at a concentration of 39.1B milligrams per liter (mg/l); however, the corresponding laboratory report indicates aluminum was present at 39.1 µg/l (flagged with the "B" qualifier). Revise the table to include the correct concentration units for aluminum in the field blank sample.

3. Table 3-4 of the Report (page 9, not page 10 as indicated in the Report's TOC) contains some errors concerning the associated laboratory reports. The Chemical Abstracts Service (CAS) number for di-n-octyl phthalate is not included in the table. According to the associated laboratory reports, the CAS number for this compound is 117-84-0. Include all available CAS numbers in the revised table. The column for Meyer results lists a concentration value for benzoic acid of 0.382 mg/l. The value is footnoted with an "a" designation by the laboratory but the footnote is not defined in the laboratory report. Revise the table to include an explanation of the laboratory footnote "a". The column for Meyer results lists a concentration value for bis(2-ethylhexyl)phthalate as not detected (ND); however, the corresponding laboratory report indicates the compound was present in the sample at a concentration of 33.4 µg/l (or 0.0334 mg/l). Revise the table to include the correct concentration value for the compound. The column for Doña Ana indicates a concentration value for butyl benzyl phthalate of 0.0015J mg/l while the corresponding laboratory report indicates the compound was ND with a reporting limit of 5.0 µg/l and method detection limit of 1.7 µg/l. Revise the table to include the correct concentration value, or otherwise resolve the discrepancy.

4. Several apparently anomalous wastewater temperature readings (100 degrees centigrade or greater) are presented in various Report graphs for April, March, February and January 2009 and December 2008 at the Meyer facility. During a recent telephone conversation with Mr. Jack Lady (Fort Bliss Wastewater Program Manager), NMED staff verified that the anomalous readings were due to faulty meter readings. Mr. Lady indicated that the meters have since been replaced which will result in more typical readings for future Reports. In future Reports, Section 3.6 (Data Quality Issues) should provide discussion of all data quality issues, rather than limiting the focus to only laboratory data quality issues.

The Permittee must respond to Comments 1 through 4 and, in the case of Comments 1 through 3, submit replacement pages that include the required edits and modifications no later than September 14, 2009. The replacement pages must be accompanied by a brief response letter that details where all revisions were made and cross reference NMED's numbered comments. The response letter must acknowledge Comment 4 and indicate that future Reports will discuss all data quality issues, including both laboratory- and non-laboratory-related issues, if applicable.

If you have any questions regarding this NOD, please contact Daniel Comeau at (505) 476-6043.

Sincerely,

James P. Bearzi
Chief
Hazardous Waste Bureau

cc: S. Waggoner DoA, Ft. Bliss
J. Lady, DoA, Ft. Bliss
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File: Ft. Bliss; (SWMUs 27B & 76) WWTP Monitoring and Flow Reports; 2009