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FACT SHEET / STATEMENT OF BASIS
October 15, 2004

NOTICE OF INTENT
TO APPROVE A PERMIT MODIFICATION TO THE
HAZARDOUS WASTE FACILITY PERMIT FOR THE
UNITED STATES ARMY AIR DEFENSE CENTER
AND FORT BLISS, NEW MEXICO

FACILITY NAME: U.S. Army Air Defense Center and Fort Bliss

PERMIT NO.: NM4213720101-01

PERMITTEE: United States Army Air Defense Center and Fort Bliss (Fort Bliss)

FACILITY:
Fort Bliss is located on approximately 1.2 million acres of land in southern New Mexico and west Texas. Fort Bliss encompasses parts of two states and three counties (Doña Ana and Otero counties in New Mexico and El Paso County in Texas). Fort Bliss is an active training facility under the U.S. Army Training and Doctrine Command (TRADOC) with a primary mission of air defense.

ACTION:
Approval, subject to public review and input, of a permit modification to remove four (4) solid waste management units (SWMUs) from Fort Bliss' requirement to conduct corrective action pursuant to their RCRA permit.

REASON FOR ACTION:
Under authority of the New Mexico Hazardous Waste Act (Chapter 74, Article 4 NMSA 1978) and the New Mexico Hazardous Waste Management Regulations (20.4.1 NMAC), the New Mexico Environment Department (NMED) can approve or deny hazardous waste permits, closure plans, permit modifications, and amendments. Under this authority, NMED intends to approve, pending public input into this decision, a modification to the RCRA permit issued to the United States Army Air Defense Center and Fort Bliss (Permittee), New Mexico (Permit No.: NM4213720101-01). Fort Bliss is an active training facility under the U.S. Army Training and Doctrine Command with a primary mission of air defense.

The proposed modification will remove four (4) sites from Table 2 - Permit Module IV of Fort Bliss's RCRA Permit. Table 2 lists sites at Fort Bliss where corrective action to characterize and/or remediate past releases of hazardous waste or hazardous waste constituents is necessary.

The New Mexico Environment Department (NMED) is also proposing to reformat and to update Fort Bliss's SWMU and AOC information by replacing Table 2 with Tables 2 and 3. Table 2 lists those SWMUs and AOCs that require corrective action. Table 3 lists those SWMUs and AOCs that do not currently require corrective action. Those SWMUs/AOCs for which Fort Bliss has demonstrated that additional investigations are not required will be placed on the new Table 3, while SWMUs/AOCs that require additional investigations will remain listed on Table 2.

Fort Bliss submitted a petition to remove five (5) SWMUs and one (1) AOC from their permit on September 14, 2000. At this time, NMED has determined that four (4) sites qualify for a no further action (NFA) determination. NMED has determined that Fort Bliss has demonstrated that one SWMU qualifies for an NFA determination because "*No release to the environment has occurred or is likely to occur in the future from the SWMU/AOC"* and that three (3) SWMUs qualify because *"The SWMU/AOC has been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use."*

The four sites recommended for no further action are:
SWMU 21 (McGregor Range Former Fire Fighting Training Area);
SWMU 22 (McGregor Range Waste Drum Storage Area);
SWMU 66 (McGregor Range Borrow Pit Buried Drum Site); and
SWMU 78 (Hueco Range Camp).

As required, Fort Bliss sent a notice of this modification request to all persons on the facility mailing list and to the appropriate units of State and local government. Fort Bliss opened a 60-day public comment by publishing a legal notice in local newspapers on October 15, 2000; the public comment period ended on December 14, 2000. Fort Bliss held a public meeting at their Restoration Action Board Meeting on November 15, 2000 in the Alamogordo Civic Center, 800 East 1st Street, Alamogordo, NM. No verbal comments were entered into the public record at the public meeting and no written comments were submitted to either Fort Bliss or NMED by the close of the public comment period on December 14, 2000. On March 22, 2001 NMED determined that Fort Bliss's NFA Petition For Six New Mexico Sites submitted was administratively complete. On September 7, 2001, NMED issued Fort Bliss with a "Request for Supplemental Information" following a technical review of Fort Bliss's petition. Fort Bliss provided the additional information and revisions on October 25, 2001. NMED reviewed Fort Bliss's petition and determined that Fort Bliss has demonstrated that four of the six sites qualify

for a NFA determination. At this time, NMED has determined that the four (4) sites qualify for a no further action (NFA) determination and is proceeding with an agency initiated modification.

AVAILABILITY OF ADDITIONAL INFORMATION:
NMED has prepared this Fact Sheet/Statement of Basis to provide information on site history, evaluation of relevant investigations, and basis for the decision to approve NFA status. The Administrative Record for this proposed action consists of this Fact Sheet/Statement of Basis, the Public Notice, the draft Permit that consists of the proposed Tables 2 and 3, and supporting documentation. The administrative record may be reviewed during the public comment period from 8:00 a.m. to 5:00 p.m., Monday through Friday at:

New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505
(505) 428-2500

The Fact Sheet/Statement of Basis, Public Notice and draft Permit may also be reviewed from 8:00 a.m. to 5:00 p.m., Monday through Friday at:

Las Cruces Branigan Memorial Library
200 East Picacho Ave
Las Cruces, NM
(505) 528-4000

Alamogordo Public Library
920 Oregon Ave
Alamogordo, NM
(505) 439-4140

A copy of the Fact Sheet/Statement of Basis, this Public Notice, and the draft Permit that consists of the proposed Tables 2 and 3, are also available on the NMED website at: www.nmenv.state.nm.us/HWB/fbperm.html under No Further Action. To obtain a copy of the Administrative Record or a portion thereof, please contact Ms. Pam Allen at the NMED phone number or address given above. NMED will provide copies, or portions thereof, of the administrative record at a cost provided under the NMED Inspection of Public Records Policy.

COMMENT PERIOD AND REGULATORY CONTACT:
NMED issued this public notice on **October 15, 2004,** to announce the beginning of a 60-day comment period that will end at **5:00 p.m., December 14, 2004**. Any person who wishes to comment on this action or request a public hearing should submit written or electronic mail (e-mail) comment(s) with the commenter's name and address to the respective address below. Only comments and/or requests received on or before **5:00 p.m., December 14, 2004** will be considered.

John E. Kieling, Program Manager
Hazardous Waste Bureau - New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303
Ref: Ft Bliss – 4 No Further Actions
E-mail: hazardous_waste_comment@nmenv.state.nm.us

Written comments must be based on the administrative record. Documents in the administrative record need not be re-submitted if expressly referenced by the commenter. Requests for a public hearing shall provide: (1) a clear and concise factual statement of the nature and scope of the interest of the person requesting the hearing; (2) the name and address of all persons whom the requestor represents; (3) a statement of any objections to the proposed action, including specific references; and (4) a statement of the issues which such persons proposes to raise for consideration at the hearing. Written comment and requests for Public Hearing must be filed with Mr. John Kieling **on or before 5:00 p.m., December 6, 2004**. The NMED will provide a thirty (30) day notice of a public hearing, if scheduled.

FINAL DECISION:
NMED must ensure that the approved draft Permit is consistent with the New Mexico Hazardous Waste Management Regulations. All written comments submitted on the draft Permit will become part of the administrative record, will be considered in formulating a final decision, and may cause the draft Permit to be modified. NMED will respond in writing to all significant public comment. The response will specify which provisions, if any, of the draft Permit have been changed in the final Permit decision, and the reasons for the change. This response will also be posted on the NMED website in addition to notifying all persons providing written comments.

After consideration of all written public comments received, NMED will issue, or modify and issue the Permit. If NMED modifies and issues the Permit, the Permittees shall be provided by mail a copy of the modified Permit and a detailed written statement of reasons for the modifications. The NMED Secretary will make the final Permit decision publicly available and shall notify the Permittees by certified mail. The Secretary's decision shall constitute a final agency decision and may be appealed as provided by the Hazardous Waste Act. All persons on the mailing list, or that provided written comments, or who requested notification in writing, will be notified of the final decision by mail.

The final decision will become effective thirty days after service of the decision, unless a later date is specified or review is requested under the New Mexico Hazardous Waste Management Regulations, 20.4.1 NMAC, Section 901.F., *Hearings*.

ARRANGEMENTS FOR PERSONS WITH DISABILITIES:
Any person with a disability requiring assistance or auxiliary aid to participate in this process should contact Judy Bentley at the following address: New Mexico Environment Department, Room N-4030, P.O. Box 26110, 1190 St. Francis Drive, Santa Fe, New Mexico 87502-6110, (505) 827-2844. TDD or TDY users please access Ms. Bentley's number via the New Mexico Relay Network. Albuquerque users may access Ms. Bentley's number at (505) 275-7333.

SUPPORTING INFORMATION

HISTORY OF INVESTIGATION:
Fort Bliss was jointly issued a Hazardous Waste Management Permit to operate a RCRA Subpart X Open Detonation Treatment Unit on July 21, 1995, by NMED and the Environmental Protection Agency (EPA) Region 6. The operating parts of the joint RCRA Permit were issued by NMED. Because the State of New Mexico was not yet authorized to implement the corrective action program required pursuant to the Hazardous and Solid Waste Amendments (HSWA) of 1984, EPA Region 6 issued the HSWA part of Fort Bliss' RCRA Permit. On January 2, 1996, NMED received authorization for corrective action and consequently is the Administrative Authority for this action. Module IV of its permit required Fort Bliss to conduct RCRA Facility Investigations (RFIs) of its SWMUs.

Fort Bliss submitted a *No Further Action* (NFA) petition to remove five (5) SWMUs and one (1) AOC from its permit on September 14, 2000. The six (6) sites are SWMU 21 (McGregor Range Former Fire Fighting Training Area), SWMU 22 (McGregor Range Waste Drum Storage Area), SWMU 27B (Doña Ana Range Wastewater Lagoon), SWMU 66 (McGregor Range Borrow Pit Buried Drum Site), SWMU 76 (Meyer Range Wastewater Lagoon), and AOC Hueco Range Camp. Fort Bliss incorrectly refers to SWMU 78 as an "Area of Concern" in its petition; the Hueco Range Camp is actually a solid waste management unit.

On March 22, 2001, NMED determined that Fort Bliss' NFA petition was administratively complete. On September 7, 2001, NMED issued Fort Bliss a "Request for Supplemental Information" following a technical review of Fort Bliss' petition. Fort Bliss provided the additional information and revisions on October 25, 2001.

INVESTIGATION RESULTS
NMED has specified five NFA criteria whereby facilities may petition for a permit modification for SWMUs/AOCs that do not require further corrective action at this time.

The six (6) SWMUs proposed for NFA by Fort Bliss are based on these criteria. At this time, NMED has determined that four (4) of these sites qualify for NFA. Brief descriptions of each of

the SWMUs proposed for NFA are included in below. A more detailed description can be found in Fort Bliss' September 14, 2000 petition, as revised on October 25, 2001. Additional references are included in the *Supporting Documentation* section below.

SELECTED REMEDY

NMED's determination that no further action is required at these sites is based on the RFI reports submitted by Fort Bliss. The demonstration of "No Further Action" is required to protect human health and the environment. Among the general criteria that NMED considers, include, but are not limited to, the following NFA Criteria:

> **Criterion 1:** *The Solid Waste Management Unit/Area of Concern (SWMU/AOC) cannot be located, does not exist, or is a duplicate SWMU/AOC.*
>
> **Criterion 2:** *The SWMU/*AOC *has never been used for the management (i.e., generation, treatment, storage and/or disposal) of Resource Conservation and Recover Act (RCRA) solid waste or hazardous wastes and/or constituents or other Comprehensive Environmental Response, Conservation and Liability Act (CERCLA) hazardous substances.*
>
> **Criterion 3:** *No release to the* environment *has occurred or is likely to occur in the future from the SWMU/AOC.*
>
> **Criterion 4:** *A release from the* SWMU*/AOC to the environment has occurred, but the SWMU/AOC was characterized and/or remediated under another authority (such as the New Mexico Environment Department's Underground Storage Tank or Ground Water Quality Bureaus), which adequately addressed RCRA corrective action, and documentation, such as a closure letter, is available.*
>
> **Criterion 5:** *The SWMU/AOC* has *been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.*

DESCRIPTION OF FOUR SWMUS THAT NMED PROPOSES TO APPROVE A NO FURTHER ACTION DETERMINATION

A. SWMU 66 (McGregor Range Camp Borrow Pit Buried Drum Site)

Overview:

SWMU 66 (McGregor Range Camp Borrow Pit Buried Drum Site, see Figure 2) is a small (*i.e.*, less than 0.1 acre), borrow pit on Fort Bliss' McGregor Range Camp that supplied caliche for

road repair projects. McGregor Range Camp consists of logistical support and staging structures, housing, maintenance, and other features in support of the Fort Bliss mission. During a joint 1992 EPA/NMED inspection of Fort Bliss, a single 55-gallon drum was found. Originally SWMU 66 consisted of a 40 feet by 90 feet by 4.5 feet deep borrow pit. After Fort Bliss determined that there was only a single drum, caliche excavation was resumed. The site is now roughly 150 feet by 300 feet by 15 feet deep and is still used for caliche material.

RCRA Facility Investigations (RFI):

1995 RFI (Golder Associates, July 1997)
Fort Bliss conducted a preliminary screening assessment of SWMU 66 in November 1995 when two samples were taken to characterize the small amount of material (about one gallon) in the drum. Five soil samples were taken under and around the buried drum to determined whether a release of hazardous waste or constituents had occurred. In addition a surface geophysics survey utilizing a magnetometer was also conducted to detect if there were other buried metal objects or buried drums in the pit area.

Fort Bliss determined that the drum contained volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), and oil and grease (POLs), constituents that are present in oil-based paint. Analysis of the five soil samples demonstrated that there was no contamination in the soils and the magnetometer survey demonstrated that there were no other buried metal objects in the area. The drum and its contents were removed and disposed of in accordance with Fort Bliss' hazardous waste permit with the State of Texas.

Summary:
Fort Bliss determined that there was no soil contamination at SWMU 66 and supports its NFA petition using NMED's NFA Criterion 3**:** *No release to the environment has occurred or is likely to occur in the future from the SWMU/AOC.*

B. SWMU 21 (McGregor Range Fire Training Area)

Overview:
SWMU 21 (McGregor Range Fire Training Area, see Figure 3) is located on the McGregor Range Camp. While operational, SWMU 21 consisted of two fire pits used by the McGregor Fire Department during fire training exercises. Each bermed burn pit was approximately 20 feet by 50 feet and the overall size of SWMU 21 was approximately 100 feet by 200 feet. During training exercises, gasoline, or other flammable substances such as wood, was ignited and then extinguished. Fire training exercises at SWMU 21 ceased during the late 1980s.

There are no naturally occurring perennial surface water bodies within five (5) miles of SWMU 21. The regional aquifer exists at depths in excess of 265 feet below ground surface (BGS). There are no water supply wells within 0.5 mile of SWMU 21 and all drinking water for McGregor Range Camp is supplied by the City of El Paso, Texas.

RCRA Facility Investigations (RFI):
Fort Bliss investigated SWMU 21 during three separate activities, including: the 1991 RFI (Environmental Science & Engineering, Inc., 1991); the 1997 Screening Investigation (U.S. Army Corps of Engineers, 1997); and the 1998 Supplemental RFI (Roy F. Weston, Inc., 1998).

1991 RFI (Environmental Science & Engineering, Inc., 1991)
During the 1991 RFI Fort Bliss collected and analyzed surface and subsurface soil samples within and around the two burn pits for organic and inorganic constituents. Three borings were completed to a depth of 15 feet BGS within SWMU 21, and one background boring was completed to establish background concentrations for TPH and metals. TPH, one VOC (tetrachloroethene), and three metals (cadmium, lead, and mercury) were detected in several surface and shallow subsurface soil samples. However, the extent of these constituents in surface and near surface soils was not completely defined during the 1991 RFI.

1997 Screening Investigation (U.S. Army Corps of Engineers, 1997)
Fort Bliss conducted a Screening Investigation of SWMU 21 in 1997 that included the installation of three direct push borings using the Site Characterization and Analysis Penetrometer System (SCAPS) to qualitatively screen for the presence of hydrocarbons. Subsurface soil samples were collected and analyzed for site-related constituents. No contaminants were identified in the SCAPS results or in samples collected from the SCAPS boreholes.

1998 SUPPLEMENTAL RFI (Roy F. Weston, Inc., 1998.)
Fort Bliss conducted a supplemental RFI at SWMU 21 in 1998 that included interviews with the local McGregor Fire Department, the collection of additional soil samples, and the determination of background concentration for metals and TPH. One VOC (1,1,1-trichloroethane), two metals (cadmium and lead), and TPH were detected during the 1998 Supplemental RFI.

Summary:
During two investigation phases, Fort Bliss detected and confirmed the presence of one VOC, (1,1,1-trichloroethane), two metals (cadmium and lead), and TPH in surface soil samples collected within SWMU 21. Because none of the constituents were detected in soil samples collected from depths greater than 15 feet below ground surface and because of the depth to the regional aquifer is approximately 265 feet, ground water was not investigated.

Fort Bliss determined that the detected VOCs did not exceed the EPA Region 6 Human Health Soil Screening Levels (EPAR6 HHSSLs).

Fort Bliss compared the detected metals with site specific background concentrations and if a metal concentration exceeded the background concentrations, Fort Bliss then compared the results to the EPAR6 RSSLs. Fort Bliss determined that several metals exceeded the site-specific background concentrations; however, none of the detected metals exceeded the EPAR6 RSSLs.

Detected TPH concentrations did not exceed those specified in NMED's TPH guidance.

Fort Bliss did not conduct a human health risk assessment because the concentrations of the detected constituents did not exceed the EPA Region 6 Human Health Screening Levels (EPAR6 HHSLs). Fort Bliss did not conduct an ecological risk assessment because there were no complete pathways for exposure to ecological receptors.

Fort Bliss bases its NFA petition upon field surveys, employee interviews, and the results of field investigations. Although a release from SWMU 21 has been documented, Fort Bliss' justifies its NFA proposal for SWMU 21 because the constituents were released at concentrations that did not pose an unacceptable risk.

In accordance with all appropriate guidelines and its RCRA Permit, and based on the available data and information, NMED has determined that Fort Bliss has demonstrated that the conditions at SWMU 21 meet the requirements of NFA Criterion 5: "*The SWMU/AOC has been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.*"

C. SWMU 22 (McGregor Range Waste Drum Storage Area)

Overview:
SWMU 22 (McGregor Waste Drum Storage Area, see Figure 4) is located on the McGregor Range Camp. SWMU 22 was historically used for storage of waste petroleum, oil, and lubricant (POLs) products. While operational, SWMU 22 consisted of a fenced area approximately 75 feet by 150 feet in size and was used to temporarily store 55-gallon drums of spent POL products. SWMU 22 has not been used since the early 1990s.

There are no naturally occurring perennial surface water bodies within five (5) miles of SWMU 22. The regional aquifer exists at depths in excess of 265 feet BGS. There are no water supply

wells within 0.5 mile of SWMU 22 and all drinking water for McGregor Range Camp is supplied by the City of El Paso, Texas.

RCRA Facility Investigations (RFI):

SWMU 22 was investigated during three separate activities, including: the 1991 RFI (Environmental Science & Engineering, Inc., 1991); the 1997 Screening Investigation (U.S. Army Corps of Engineers, 1997); and the 1998 Supplemental RFI (Roy F. Weston, Inc., 1998).

1991 RFI (Environmental Science & Engineering, Inc., 1991)
Fort Bliss collected and analyzed surface and subsurface soil samples for organic and inorganic constituents within and around SWMU 22. Four borings were completed to a depth of 15 feet BGS within SWMU 22 and one background boring was completed to establish background concentrations for TPH and metals. Fort Bliss detected three metals (cadmium, lead, and mercury), five SVOCs (phenanthrene, bis-2-(ethylhexyl)phthalate, diethylphthalate, 2-methylnaphthalene, and phenanthrene) and TPH in surface and shallow subsurface soil samples.

1997 Screening Investigation (U.S. Army Corps of Engineers, 1997)
Fort Bliss conducted a Screening Investigation of SWMU 22 in 1997 that included the installation of three direct push borings using the Site Characterization and Analysis Penetrometer System (SCAPS) to qualitatively screen for the presence of hydrocarbons. Subsurface soil samples were collected and analyzed for site-related constituents. No contaminants were identified in the SCAPS results or in samples collected from the SCAPS boreholes.

1998 RFI (Roy F. Weston, Inc., 1998)
Fort Bliss conducted a supplemental RFI at SWMU 22 in 1998 that included interviews with the local McGregor Fire Department, the collection of additional soil samples, and the determination of background concentration for metals. None of the constituents analyzed as part of the 1998 RFI were detected at concentrations that exceeded the EPAR6 HHSSLs. The TPH and SVOC constituents previously identified during the 1991 RFI were not detected during the 1998 RFI.

Summary:
Fort Bliss detected TPH, five SVOCs, and one metal in surface soil samples collected at SWMU 22 during the 1991 RFI. However, confirmation sampling in 1998 failed to confirm the presence of TPH and the five SVOCs. Fort Bliss determined that the concentration of lead did not exceed the EPAR6 HHSSLs. Because none of the constituents were detected in soil samples obtained from depths greater than 15 feet below ground surface and because the depth to the regional aquifer is greater than 265 feet, ground water was not investigated.

Fort Bliss did not conduct a human health risk assessment because the concentrations of the detected constituents did not exceed the EPAR6 RSSLs. Fort Bliss did not conduct an ecological risk assessment because there were no complete pathways for exposure to ecological receptors.

Although the 1991 RFI indicated that a release from SWMU 22 had occurred, additional investigations failed to confirm the release. Fort Bliss' justifies its NFA proposal for SWMU 22 because it conducted an investigation in 1998 and did not detect contamination.

Fort Bliss' proposed NFA for SWMU 22 is based upon field surveys, employee interviews, and the results of investigatory sampling activities. In accordance with all appropriate guidelines and its RCRA Permit, and based on the available data and information, NMED has determined that Fort Bliss has demonstrated that the conditions at SWMU 22 meet the requirements of NFA Criterion 5: "*The SWMU/AOC has been characterized or remediated in accordance with current applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use.*"

D. SWMU 78 (Hueco Range Camp)

Overview:
SWMU 78 (Hueco Range Camp, see Figure 7) is located in the northern part of Fort Bliss, approximately ten (10) miles west of the McGregor Range Camp, and ten (10) miles southeast of the Doña Ana Range Camp. All that remains of the Hueco Range Camp are building foundations and several apparent sewer access points. The housing area consisted of water storage tanks, wooden buildings, other unknown structures, and at least 10 concrete slabs believed to have been used as foundations for temporary tent housing. Adjacent to the concrete slabs are what appear to be sewer access points, possibly for routing wastewater from showers and latrines. These structures are all still connected and eventually join a sewer line located east of the housing area. This sewer line trends eastward away from the temporary tent housing and then turns south toward a topographic depression that may have been used as an evaporation pond.

A second group of building foundations north of the tent area paralleled the paved road. Their exact use is unknown; however, some were apparently classrooms, a water supply operations building, and nine other buildings (approximately 10 feet wide by 30 feet long) of unidentified uses. A large rectangular hole in the floor of each of the nine other buildings may have been used to collect waste fluids or other materials from the associated activities. A second line of sewer access points can be traced from this line of former structures to a large structure approximately 15 feet wide by 50 feet long and at least 10 feet deep that resembles an oil/water separator.

Diesel fuel and fuel oil were used throughout the training site to supply ground water pumps, food preparation facilities, and other activities. A railroad spur located in the northeast corner of the site was reportedly used until the 1960s to transport training vehicles and supplies to the Hueco Range Camp. Evidence of a rail line cannot, however, be identified on aerial photographs or indicated on the site plan.

Hueco Range Camp was used primarily as a radio control aerial target (RCAT) launch site. Activities at Hueco Range Camp were terminated in the mid-1960s and nearly all structures were demolished; only a water tower and pump building remain. The Hueco Range Camp is currently used as a remote training area mainly during yearly maneuvers.

RCRA Facility Investigations (RFI):

SWMU 78 was characterized by Fort Bliss during two investigations, including the 1997 Preliminary Screening Assessment and the 1998 RFI.

1997 Preliminary Screening Assessment (U.S. Army Corps of Engineers, 1997)
Fort Bliss installed several test borings near an active water well. Fort Bliss conducted a Screening Investigation of SWMU 78 in 1997 that included the installation of three direct push borings using the Site Characterization and Analysis Penetrometer System (SCAPS) to qualitatively screen for the presence of hydrocarbons. Subsurface soil samples were collected and analyzed for site-related constituents. No contaminants were identified in the SCAPS results or in samples collected from the SCAPS boreholes.

1998 RFI (Roy F. Weston, Inc., 1998)
Fort Bliss conducted an RFI at SWMU 78 in 1998. The 1998 RFI included a record search in addition to sampling. Fort Bliss also compiled a brief description of historical operations at SWMU 78. Site reconnaissance visits were also conducted to identify features discovered during the record search and other visible suspect areas not identified during the research effort.

As part of the 1998 RFI, Fort Bliss collected surface soil samples to establish background concentrations. Fort Bliss collected surface and subsurface samples from areas where potential waste disposal, material usage, or material storage may have occurred. Fort Bliss also sampled three deep ground water wells.

Fort Bliss detected metals (cadmium, lead, and selenium), three VOCs (tetrachloroethene; 1,1,2,2-tetrachloroethane; benzo(g,h,i)perylene) and four pesticides (DDD, DDE, DDT, and HxCDD) in soil samples. The majority of the organic compound detections were reported in two samples obtained from a building foundation sump feature and near the outfall structure of the former sewer

system. However, Fort Bliss determined that none of the reported metal and organic chemical concentrations exceeded the EPA Region 6 HHSLs.

Three ground water wells were sampled during the 1998 RFI. One active well is presently used as a drinking water source for Army personnel. Fort Bliss detected three metals (cadmium, lead, and selenium) in ground water samples at concentrations that exceed their respective EPA maximum contaminant levels (MCLs). Two metals (cadmium and lead) were detected in the inactive on-site well; however, Fort Bliss has determined that these metals are associated with the deteriorated condition of the steel well casing materials. Fort Bliss did not detect elevated metals in the active on-site well. Fort Bliss detected VOCs in the active on-site well at concentrations less than the applicable EPA MCLs.

Summary:
Several metals were detected in soil samples at concentrations that exceed the associated background concentration values; however, none of the metals concentrations exceeded the EPA Region 6 HHSLs. Fort Bliss compared organic compounds detected in soil samples to the EPA Region 6 HHSLs and determined that the concentrations did not exceed risk-based screening levels.

Three metals (cadmium, lead, and selenium) were detected in ground water samples from two inactive wells at concentrations that exceeded the EPA MCLs; however, Fort Bliss determined that the deteriorated condition of the steel well materials is the source of the metals reported in the inactive wells, rather than a release of hazardous waste and/or hazardous constituents. Fort Bliss determined that the detected constituents in the active well did not exceed applicable risk-based concentrations (*i.e.,* NMED Soil Screening Levels (NMED SSLs), EPAR6 HHSLs, EPA MCLs, and/or New Mexico Water Quality Control Commission (WQCC) standards).

Fort Bliss did not conduct an ecological risk assessment because there were no complete pathways for exposure to ecological receptors. Very little vegetation exists on the site and exposure through ingestion of plants is not likely. The presence of the reported constituents are associated with non-surface soils and exposure through contact is not likely. There are no surface water bodies within five (5) miles of the former Hueco Range Camp and the regional aquifer occurs in excess of 300 feet BGS.

The proposed NFA determination for SWMU 28 is based upon field reconnaissance surveys, employee interviews, records review, and the results of soil sampling activities. In accordance with NMED guidelines and based on the available data and information, NMED has determined that Fort Bliss has demonstrated that the conditions at SWMU 78 meet the requirements of a NFA Criterion 5: *"The SWMU/AOC has been characterized or remediated in accordance with current*

applicable state or federal regulations, and the available data indicate that contaminants pose an acceptable level of risk under current and projected future land use."

SUPPORTING DOCUMENTATION

Environmental Science & Engineering, Inc., September 1991. RCRA Facility Investigation Report, New Mexico Solid Waste Management Units (SWMUs: 18, 19, 20, 25, 25B, 27, 27B, 29, 76).

Golder Associates, July 1997. Final Report Preliminary Site Investigations.

Malcolm Pirnie, Inc., December 1998. Ground water Sampling.

Malcolm Pirnie, Inc., August 2000. Screening-Level Ecological Risk Assessment Addendum.

Roy F. Weston, Inc., December 1996. RCRA Facility Investigation (RFI).

Roy F. Weston, Inc., 1998. Final RCRA Facility Assessment - Hueco Range Camp - Fort Bliss, Texas.

Tetra Tech, Inc. July 1998. Subsurface Investigation of the New Mexico Oxidation Lagoons.

Tetra Tech, Inc., December 1997. Subsurface Investigation.

U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM), August 1998. Wastewater Feasibility Study.

U.S. Army Corps of Engineers, 1997. Screening Investigation.