



DEPARTMENT OF THE ARMY
FORT WINGATE DEPOT ACTIVITY
P.O. BOX 268
FORT WINGATE, NM 87316

October 4, 2011

Mr. John Kieling
Chief, Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Dear Mr. Kieling:

The purpose of this letter is to submit a petition for the Corrective Action Complete Determination without controls for Areas of Concern (AOCs) 71, 78, 82, 87, and 93. In addition, Fort Wingate Depot Activity (FWDA) proposes removing Parcels 5A, 12 and 14 from RCRA Permit EPA ID# NM6213820974 (Permit). FWDA proposes modifying Permit Attachment 8 by moving these sites from Table 1 (Areas of Concern Requiring Action) to Table 4 (Corrective Action Complete without controls) and modifying Attachment 2 depicting the three parcels removed. The rationale for this petition is provided in the paragraphs below.

Areas of Concern 71 and 87 are found in Parcel 21 in the workshop area. AOC 71 is listed in Permit Attachment 8, Table 1, as a "Former rectangular structure near TMW-5 and north of Building 528." AOC 87 is listed as "Feature 18 on 1962 aerial photo (API-3) and Feature 23 on 1973 aerial photo (API-5) in Archive Search Report". The Army assessed and investigated both sites and submitted to NMED a *Release Assessment Report for Parcel 21*, dated February 7, 2008. Section 10 of the report documents the Army's records review, site inspection, confirmatory sampling, analysis, and conclusions for AOC 71. Section 13 of the report documents the Army's records review, site inspection, and conclusions for AOC 87. In a letter titled *Parcel 21 Release Assessment Report, February 7, 2008, FWDA-07-003*, dated July 3, 2008 the New Mexico Environment Department (NMED) determined no further action is required based on the information provided in the Army's *Release Assessment Report for Parcel 21*.

Areas of Concern 78 and 82 are found in Parcels 4A, 5A, and 6 along the west patrol road. These two AOCs consisted of four former ammunition storage sites. The Army elected to address the AOCs in the *Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan for Parcel 6 (Revised)*, dated April 30, 2010. AOC 78 is listed in Permit Attachment 8, Table 1, as "Feature 18 on 1973 aerial photo (API-5) in 1995 Archive Search Report". AOC 82 is listed as "Area adjacent to the east of Feature 18 on 1973 aerial photo (API-5) in 1995 Archive Search Report that includes drainage swale, wetland area and arroyo". The Army assessed and investigated both sites and submitted the above Work Plan to NMED. Section 13 of the Work Plan documents the Army's records review, site inspection, digital geophysical mapping and survey, confirmatory sampling, analysis, and conclusions for AOCs 78 and 82. The NMED reviewed the Work Plan and issued a letter titled *Second Notice of Disapproval RCRA Facility Investigation Work Plan for Parcel 6, FWDA, FWDA-08-001*. The NMED concurred with the Army that no further characterization is necessary at AOC 78 and 82 in the letter's comment number 6. Areas of Concern 78 and 82 are the only Permit sites in Parcel 5A and therefore FWDA petitions Parcel 5A for removal from the Permit. Permit Attachment 2 has been updated to reflect this change and is available online at www.ftwingate.org.

Areas of Concern 75 and 93 are the only Permit sites found in Parcel 12. Area of Concern 93 is also found in Parcel 14 and will be discussed in the next paragraph. Area of Concern 75 is used to describe all transformers at FWDA and is listed in Permit Attachment 8, Table 1, as “Electrical Transformers”. The only transformer location in Parcel 12 was a former pole mounted non-PCB transformer once adjacent to Building 18, the guard house. Since AOC 75 is used to describe all transformers at FWDA is not petitioned for removal from the Permit at this time, however the Army in this letter is petitioning its corrective action completion without controls at Parcel 12. The Army addresses AOC 75 in the *RCRA Facility Investigation Work Plan, Parcels 12, 14, and 25*, dated June 27, 2008. Section 4 of the Work Plan documents the Army’s records review, site inspection, and conclusions for AOC 75. The Army concluded no further characterization was necessary. The NMED approved the Work Plan in a letter titled *Approval with Modification, RCRA Facility Investigation Work Plan, Parcels 12, 14, and 25, FWDA-08-003* dated August 7, 2008. The Army also addressed AOC 75 in the *Final Release Assessment Report for Parcel 12 and Parcel 14*, dated November 16, 2010. This report addressed the modifications required by the August 7, 2008 letter. Section 5 of the report addresses AOC 75 and summarizes the findings in the above mentioned June 27, 2008 Work Plan. The Army proposed no additional investigation for AOC 75. The NMED reviewed the Report and concluded no further investigation is required at Parcels 12 and 14 in a letter titled *Approval, Final Release Assessment Report for Parcel 12 and 14, FWDA-10-005*, dated December 8, 2010. Since AOCs 75 and 93 (described below) are the only Permit sites found in Parcel 12, the Army petitions Parcel 12 for removal from the Permit. Permit Attachment 2 has been updated to reflect this change and is available online at www.ftwingate.org.

Area of Concern 93 is also found in Parcel 14 and is the only Permit site in Parcel 14. Area of Concern 93 is listed in Permit Attachment 8, Table 1, as “Bivouac and Tank Training Area”. The Army prepared *RCRA Facility Investigation Work Plan, Parcels 12, 14, and 25*, dated June 27, 2008 to assess and investigate AOC 93. Section 3 of the Work Plan documents records review, site inspection, coordination with former user, and proposed confirmatory sampling and analysis for AOC 93. The NMED approved the Work Plan in a letter titled *Approval with Modification, RCRA Facility Investigation Work Plan, Parcels 12, 14, and 25, FWDA-08-003* dated August 7, 2008. The Army implemented the modifications, executed the Work Plan, and reported the results in the *Final Release Assessment Report for Parcel 12 and Parcel 14*, dated November 16, 2010. Sections 2, 3, and 4 of the Report documents the Army’s records review, site inspection, soil investigation, debris removal and disposal, and coordination with the National Guard, confirmatory sampling, analysis, and conclusions for AOC93. The NMED reviewed and approved the Report and concluded no further investigation is required at Parcels 12 and 14 in a letter titled *Approval, Final Release Assessment Report for Parcel 12 and 14, FWDA-10-005*, dated December 8, 2010. Since AOC 93 is the only Permit site found in Parcel 14, the Army petitions Parcel 14 for removal from the Permit. Permit Attachment 2 has been updated to reflect this change and is available online at www.ftwingate.org.

Permit Section VIII.B.1. Copies of all the correspondence and documents referenced in this letter can be found in the FWDA Administrative Record at Building 1 at Fort Wingate Depot Activity and online at www.ftwingate.org. If you have questions or require further information, please call me at 330-358-7312.

Sincerely,



Mark Patterson
BRAC Environmental Coordinator

CF:
Shannon Duran, NMED HWB
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