



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

April 24, 2023

Base Realignment and Closure Operations Branch

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

RE: Phase 3, Limit of Detection / Limit of Quantitation Submission in Support of Analytical Performance Concerns at FWDA, Fort Wingate Depot Activity, McKinley County, New Mexico. EPA# NM6213820974

Dear Mr. Shean:

Following from my letter of December 28, 2022, and as requested by the New Mexico Environment Department (NMED), I am writing to provide the results of the Phase 3 effort to address NMED's analytical performance concerns at Fort Wingate Depot Activity (FWDA). The submittal of Phase 3 results follows submittals of Phase 1 and 2 results earlier in 2022. In Phase 1 (July 18, 2022), the Army presented analytical performance data collected from 45 responding Department of Defense Environmental Laboratory Accreditation Program (DoD-ELAP) certified laboratories and evaluated the results against NMED screening levels (SL). In Phase 2, the DoD-ELAP certified laboratories were queried again for additional methods that could be used at FWDA to achieve greater analytical sensitivity for analytes that had Limit of Detection / Limit of Quantitation (LOD/LOQ) issues in Phase 1. Phase 2 identified a limited number of additional methods and DoD-ELAP certified facilities that could improve laboratory analytical sensitivity.

In Phase 3, the subject of this submittal, the Army began with the analytes where LOQ remained above the SL from Phases 1 and 2 and continued with a multiple Lines-of-Evidence (LOE) approach to assess whether the analyte(s) is/are unlikely to be found at a particular location at FWDA. At the conclusion of the LOE steps, the Army identified several remaining site-related contaminants of concern (COC) for which laboratories were not able to achieve LOQ below the SL. For these outstanding analytes, the Army requests to have further discussions with NMED to determine an acceptable resolution.

Adhering to Federal regulations and Army policy (32 CFR § 188.4, R-200-1-7), and the DoD Quality Systems Manual for Environmental Laboratories (DoD QSM), the Army is required to use DoD-ELAP certified labs for the collection of definitive data to support site investigations and corrective actions in the Defense Environmental Restoration Program (DERP) at FWDA.

Please review the attached Phase 3 enclosures. The Army looks forward to discussing these results with NMED and to developing an agreeable path forward. In addition, the Army will be submitting a proposal for resolution of the LOQ issue in the upcoming April 25, 2023, submittal regarding the status update to the 2019 Notices of Violation.

If you have questions or require further information, please contact me at George.h.cushman.civ@army.mil, 703-455-3234 (Temporary Home Office, preferred) or 703-608-2245 (Mobile).

Sincerely,

George H. Cushman IV

George H. Cushman IV
BRAC Environmental Coordinator
Fort Wingate Depot Activity
BRAC Operations Branch
Environmental Division

Enclosures:

Enclosure 1- Phase 3 LOD/LOQ Submission to NMED – Text and Tables
Lines-of-Evidence Evaluation for VOCs, SVOCs, PAHs, Explosives, PCBs, Pesticides,
Metals, Dioxins/Dibenzofurans, DRO/GRO and Miscellaneous Analyses (Perchlorate
and Ions) in Groundwater

Enclosure 2- Phase 3 LOD/LOQ Submission to NMED – Appendix 1-10
Lines-of-Evidence Evaluation and Supporting Information for VOCs, SVOCs, PAHs,
Explosives, PCBs, Pesticides, Metals, Dioxins/Dibenzofurans, DRO/GRO and
Miscellaneous Analyses (Perchlorate and Ions) in Groundwater

CF:

Dave Cobrain, NMED, HWB
Ben Wear, NMED, HWB
Michiya Suzuki, NMED, HWB
Lucas McKinney, U.S. EPA Region 6
Laurie King, U.S. EPA Region 6
Ian Thomas, BRAC OPS
Alan Soicher, USACE
Saqib Khan, USACE
Cheryl Montgomery, ERDC
Ramon Sanchez, USACE
Sharlene Begay-Platero, Navajo Nation
Timothy Trimble, Zuni Tribe
Alvin Whitehair, SW BIA
Wenona Wilson DOI/BIA
Eric Shepard, DOI
George Padilla, BIA, NRO
Admin Record, NM / Ohio