



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

June 14, 2023

Army Environmental Division - BRAC Operations Branch

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

RE: Response to Approval with Modifications, Final Interim Measures Completion Report, Parcel 21, Solid Waste Management Unit 1 - TNT Leaching Beds Revision 2, Fort Wingate Depot Activity, McKinley County, New Mexico. HWB-FWDA-19-006, EPA# NM6213820974

Dear Mr. Maestas:

This letter provides responses to the Approval with Modifications, Final Interim Measures Completion Report, Parcel 21, Solid Waste Management Unit 1 - TNT Leaching Beds Revision 2, HWB-FWDA-19-006, from the New Mexico Environment Department (NMED), dated April 3, 2023.

In addition to the comment responses provided in this letter, hard copy replacement pages and an electronic version of the revised Report is included. The response letter identifies where each comment was addressed in the revised report.

Comments:

1. Permittee Statement: "[T]he Army proposes to include consideration of this remaining contamination in the resumption of work on the Parcel 21 RCRA Facility Investigation (RFI), which is scheduled to begin in 2023. If the RFI identifies the need for additional remedial action at the stockpile areas, the Army will address the need at that time."

NMED Comment: Note that the RDX concentrations in all soil samples collected from Soil Stockpile Areas 1 and 2 remain significantly above the NMED SL-SSL of 0.06 mg/kg; therefore, the Permittee is required to investigate the stockpile areas and remediate the residual contamination. In a response letter, provide a proposed date for submittal of the referenced work plan for NMED review.

Permittee Response: Concur. As proposed in the Army's April 24, 2023, letter to NMED regarding outstanding documents, the Army plans to submit a Parcel 21 RFI Work Plan by March 15, 2024.

2. Permittee Statement: "The IMWP only references SL-SSLs for contaminants of concern (i.e., TNT, RDX, nitrate)."

and,

"Text has been added to Section 5.8 noting that analytes were not detected in pre- or post- use sample results."

NMED Comment: Section 5.8 (Closure Soil Staging Area), page 5-15, states, "HMX, RDX, and TNT were detected at low levels (less than direct contact SSLs and ESLs) with maximum concentrations of 1.12, 6.05, and 1.08 mg/kg, respectively." The SL-SSLs for RDX and TNT are 0.06 and 0.86 mg/kg, respectively; therefore, these contaminant concentrations in soil exceed their respective SL-SSLs. Stating that the soil concentrations did not exceed direct contact SSLs, while failing to state that residual contamination remains that exceed their respective SL-SSLs in the soil samples is misleading. State that residual contamination in excess of NMED's SL-SSLs remains in the soil staging areas in the revised Report. Provide replacement pages or reference the sections of the Report where this information is provided in the response letter.

Permittee Response: Concur. Section 5.8 has been revised to include a statement regarding the comparison of post-use soil stockpile samples to SL-SSLs.

Section 5.8, Closure of Soil Staging Areas are revised as follows:

No COCs were detected at concentrations greater than SSLs/RSLs or ESLs. However, RDX exceeded its SL-SSL (0.06 mg/kg) in all Area 1 and Area 2 decision units. TNT also exceeded its SL-SSL (0.86 mg/kg) in one Area 1 decision unit. Tables 5-23 and 5-24 present Area 1 sample results from August and September 2019, respectively. Table 5-25 present Area 2 sample results from both events.

3. Permittee Statement: "Figure 5-18 has been added, which identifies Areas 1 and 2 decision units with post-use analyte concentrations that exceed SL-SSLs."

NMED Comment: Figure 5-18 (Post-Use Stockpile Results) does not identify the sampling locations where analyte concentrations exceed respective SL-SSLs. Correct the figure to identify the locations of the exceedances identified in Tables 5-24 and 5-25 and provide a replacement figure.

Permittee Response: Concur. Please see attached revised Figure 5-18 that provides labels for the locations of the exceedances.

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

CF:

Dave Cobrain, NMED, HWB
Ben Wear, NMED, HWB
Michiya Suzuki, NMED, HWB
Dale Thrush, U.S. EPA Region 6
Laurie King, U.S. EPA Region 6
Ian Thomas, BRAC Ops
Alan Soicher, USACE
Saqib Khan, USACE
Alvin Whitehair, SW BIA
George Padilla, BIA, NRO
Sharlene Begay-Platero, Navajo Nation
Timothy Trimble, Zuni Tribe
Admin Record, NM / Ohio